IMPORTANT DRUG WARNING

Subject: Risk Evaluation and Mitigation Strategy (REMS) for
SUBOXONE® (buprenorphine and naloxone) Sublingual Film CIII
Authorized Generic of SUBOXONE® (buprenorphine and naloxone) Sublingual Film CIII
SUBOXONE® (buprenorphine and naloxone) Sublingual Tablets CIII
SUBUTEX® (buprenorphine) Sublingual Tablets CIII

Dear Prescriber:

You are receiving this letter because you are a prescriber certified to treat opioid dependence under the Drug Addiction Treatment Act of 2000 (DATA 2000).

The purpose of this letter is to inform you of a Risk Evaluation and Mitigation Strategy (REMS) for SUBOXONE sublingual film, Authorized Generic of SUBOXONE sublingual film, SUBOXONE sublingual tablets, SUBUTEX sublingual tablets, hereafter collectively called buprenorphine-containing products. This REMS does not apply to buprenorphine-containing products that are dispensed to patients in an Opioid Treatment Program (OTP) under 42 CFR Part 8.

The FDA has determined that a REMS is necessary to ensure that the benefits of buprenorphine-containing products for opioid dependence outweigh the potential risks of accidental overdose, misuse, and abuse. Buprenorphine, like morphine and other opioids, has the potential for being abused and misused. Abuse of buprenorphine poses a risk of overdose and death. This risk is increased with the concomitant use of buprenorphine and alcohol and other central nervous system (CNS) depressants, especially benzodiazepines.

SUBUTEX sublingual tablets, SUBOXONE sublingual tablets, SUBOXONE sublingual film, and the Authorized Generic for SUBOXONE sublingual film are partial-opioid agonists indicated for the treatment of opioid dependence. Products containing the single active ingredient buprenorphine are indicated for the treatment of opioid dependence and are preferred for induction. SUBOXONE sublingual film is one of several buprenorphine/naloxone-containing products that may be used for induction in patients physically dependent on heroin or other short-acting opioids. All products can be used for maintenance.

Prescriber Action

To meet the requirements of the REMS and to ensure the benefits of prescribing buprenorphine-containing products outweigh the risks of accidental overdose, misuse, and abuse, prescribers should take the following measures and document actions taken with each patient to ensure safe use conditions:
Verify the patient meets appropriate diagnostic criteria for opioid dependence

Check state Prescription Drug Monitoring Programs, where practical, to identify behaviors that may represent abuse and review all medications (e.g., benzodiazepines, other opioids, and CNS depressants) to assess for appropriateness of co-prescribing.

Discuss the risks (including misuse and abuse) and side effects associated with buprenorphine-containing products, including those described in the Medication Guide.

Explain what patients should do if they experience side effects.

Provide induction doses under appropriate supervision

Prescribe a limited amount of medication to the patient that will last until the next visit

Discuss the risks and side effects associated with buprenorphine-containing products, including those described in the Medication Guide.

How to safely store the medication out of the sight and reach of all others, especially children

Schedule patient appointments commensurate with patient stability (weekly or more frequent visits recommended for the first month)

Consider “pill/film count”/dose reconciliation

Assess whether the patient is receiving the counseling/psychosocial support considered necessary for treatment, and if not, encourage them to do so.

Assess whether the patient is making progress toward treatment goals, including, as appropriate, urine toxicology testing

Continually assess appropriateness of maintenance dose

Continually assess whether or not benefits of treatment outweigh the risks

Serious Risks of Buprenorphine-containing Products

The following key messages need to be communicated to patients about safe use of products covered under the REMS to mitigate the serious risks of accidental overdose, misuse, and abuse:

Instruct patients to keep these products in a secure place, out of the sight and reach of all others, especially children. Accidental or deliberate ingestion by a child may cause respiratory depression that can result in death. If a child is exposed to one of these products, medical attention should be sought immediately.

Warn patients that it is extremely dangerous to self-administer non-prescribed benzodiazepines or other central nervous system (CNS) depressants (including alcohol) with these products. Caution patients prescribed benzodiazepines or other CNS depressants to use them only as directed by their prescriber.

Instruct patients never to give these products to anyone else, even if he or she has the same signs and symptoms. They may cause harm or death.

Advise patients that buprenorphine-containing products contain an opioid that can be a target for people who abuse prescription medications or street drugs. Caution patients to keep their products in a safe and secure place, out of the reach of all others, especially children, and to protect them from theft.

Advise patients that selling or giving away buprenorphine-containing products is against the law.

Use the contents of each buprenorphine-containing drug product's Medication Guide, in its entirety, with each patient to review the information noted above, including side effects and what to do if a patient has them. The Medication Guide will be dispensed with each prescription for a buprenorphine-containing transmucosal product.

Strongly encourage patients to seek psychosocial counseling and support for safe and effective treatment.
Patient Monitoring and Appropriate Dosing Info

An Appropriate Use Checklist is enclosed to assist you in performing and documenting the above prescriber actions of the SUBOXONE sublingual film, the Authorized Generic of SUBOXONE sublingual film, SUBOXONE sublingual tablets, and SUBUTEX sublingual tablets REMS. You may use the enclosed checklist or other means (e.g., electronic health record) specific to your office practice to document that the above actions have been completed for each patient.

Reporting Adverse Events

To report SUSPECTED ADVERSE EVENTS contact:

- Indivior Inc. at 1-877-782-6966 or
- FDA MedWatch program by phone at 1-800-FDA-1088 or online at www.fda.gov/medwatch/report.htm

This letter is not a comprehensive description of the risks associated with the use of buprenorphine-containing products. Additional important safety information can be found in the **Office-Based Buprenorphine Therapy for Opioid Dependence: Important Information for Prescribers** educational brochure and Prescribing Information.

Additional copies of the educational brochure, Appropriate Use Checklist, Prescribing Information, and Medication Guide for each product covered under the SUBOXONE sublingual film, the Authorized Generic of SUBOXONE sublingual film, SUBOXONE sublingual tablets, and SUBUTEX sublingual tablets REMS can be obtained at www.suboxoneREMS.com, http://www.accessdata.fda.gov/scripts/cder/drugsatfda/index.cfm, or by contacting the toll-free call center at 1-866-463-4846.

Sincerely,

Baher Mankabady, MD
Vice President, Global Safety Department
Indivior Inc.

Enclosures:
Appropriate Use Checklist
Prescriber Brochure: Office-Based Buprenorphine Therapy for Opioid Dependence: Important Information for Prescribers