

**Department of Health and Human Services
Food and Drug Administration
Center for Drug Evaluation and Research
Office of Surveillance and Epidemiology
Office of Medication Error Prevention and Risk Management
FINAL RISK EVALUATION AND MITIGATION STRATEGY (REMS)
MODIFICATION REVIEW**

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Reviewers: Sangeeta Tandon, Pharm.D. M.P.H.
Risk Management Analyst
DRISK

Joan E. Blair, R.N., M.P.H.
Health Communications Analyst
Division of Risk Management (DRISK)

Team Leader: Kim Lehrfeld, Pharm.D.
DRISK

Division Director: Cynthia LaCivita, Pharm.D
DRISK

Drug Names: See table below

Therapeutic Class: Opioid Agonist: Extended-Release and Long-Acting
Opioid Analgesic Drug Products

Table I: ER/LA Opioid Analgesic REMS Modification Submissions

Drug Name	Dosage and Route	Application Type/Number	Submission Date, Supplement Number
Belbuca (buprenorphine)	buccal film	NDA 207932	8/24/16; SUPPL-3
Butrans (buprenorphine)	transdermal system	NDA 021306	8/22/16; SUPPL-26
Dolophine (methadone hydrochloride)	tablet	NDA 006134	8/22/16; SUPPL-42
Duragesic (Fentanyl Transdermal System)	transdermal system	NDA 019813	8/24/16; SUPPL-71

Embeda (morphine sulfate and naltrexone hydrochloride)	extended-release capsule	NDA 022321	8/17/16; SUPPL-23
Exalgo (hydromorphone HCl)	extended-release capsule	NDA 021217	8/19/16; SUPPL-20
Hysingla (hydrocodone bitartrate)	extended release tablet	NDA 206627	8/22/16; SUPPL-5
Kadian (morphine sulfate)	extended-release capsule	NDA 020616	8/18/16; SUPPL-58
MS Contin (morphine sulfate)	controlled-release tablet	NDA 019516	8/22/16; SUPPL-50
Methadone	oral solution	ANDA 087997	8/23/16, SUPPL-32
Methadone oral solution	oral solution	ANDA 087393	8/23/16, SUPPL-41
Methadone	oral concentrate	ANDA 089897	8/22/16; SUPPL-35
MorphaBond (morphine sulfate)	extended-release tablet	NDA 206544	8/23/16; SUPPL-4
Nucynta ER (tapentadol)	extended-release tablet	NDA 200533	8/23/16; SUPPL-15
Opana ER (oxymorphone hydrochloride)	extended-release tablet	NDA 201655	8/24/16; SUPPL-22
Opana ER (oxymorphone hydrochloride)	extended-release tablet	NDA 021610	8/24/16; SUPPL-23
Oxycontin (oxycodone hydrochloride)	controlled-release tablet	NDA 022272	8/22/16; SUPPL-36
Targiniq (oxycodone hydrochloride and naloxone hydrochloride)	extended-release tablet	NDA 205777	8/22/16; SUPPL-5
Troxyca ER (oxycodone hydrochloride/naltrexone hydrochloride)	extended-release capsule	NDA 207621	8/23/16; SUPPL-1
Xtampza ER (oxycodone)	extended-release capsule	NDA 208090	8/23/16; SUPPL-2

Zohydro ER (hydrocodone bitartate)	extended-release capsule	NDA 202880	8/24/16; SUPPL-11
morphine sulfate	extended-release capsule	ANDA 079040	9/7/16; SUPPL- 14
fentanyl transdermal system	transdermal system	ANDA 077449	8/22/16; SUPPL-20
methadone HCL	tablet	ANDA 040050	8/19/16; SUPPL-22
methadone HCL	tablet	ANDA 040517	8/19/16, SUPPL-20
morphine sulfate	extended-release tablet	ANDA 076412	8/19/16, SUPPL-25
morphine sulfate	extended-release tablet	ANDA 076438	8/19/16, SUPPL-22
fentanyl transdermal system	transdermal system	ANDA 077154	8/19/16; SUPPL-16
morphine sulfate	extended-release tablet	ANDA 200824	8/18/16, SUPPL-14
fentanyl transdermal system	transdermal system	ANDA 076258	8/18/16, SUPPL-33
fentanyl transdermal system	transdermal system	ANDA 077062	8/24/16; SUPPL-34
morphine sulfate	extended-release capsule	ANDA 200812	8/24/16, SUPPL-10
morphine sulfate	extended-release tablet	ANDA 078761	8/24/16; SUPPL-10
morphine sulfate	extended-release tablet	ANDA 074769	8/23/16; SUPPL-27
morphine sulfate	extended-release tablet	ANDA 074862	8/23/16; SUPPL-26
methadone HCL	tablet	ANDA 040241	8/24/16; SUPPL-16
methadone HCL	tablet	ANDA 090635	8/24/16; SUPPL-14
morphine sulfate	extended-release capsule	ANDA 202104	8/17/16; SUPPL-7

morphine sulfate	extended-release tablet	ANDA 075295	8/24/16; SUPPL-47
fentanyl transdermal system	transdermal system	ANDA 076709	8/26/16; SUPPL-27
oxymorphone HCl	extended-release tablet	ANDA 200822	8/24/16; SUPPL-10
hydromorphone HCl	extended-release tablet	ANDA 202144	8/19/16, SUPPL-10
oxymorphone HCl	extended-release tablet	ANDA 202946	8/19/16, SUPPL-5
oxymorphone HCl	extended-release tablet	ANDA 079046	9/7/16; SUPPL-25
oxymorphone HCl	extended-release tablets	ANDA 079087	8/24/16; SUPPL-26
methadone HCl	oral solution	ANDA 090707	8/24/16; SUPPL-10
morphine sulfate	extended-release tablet	ANDA 203849	9/7/16- SUPPL-7
morphine sulfate	extended-release tablet	ANDA 77855	8/24/16; SUPPL-17
morphine sulfate	extended-release tablet	ANDA 76720	8/24/16; SUPPL-20
morphine sulfate	extended-release tablet	ANDA 76733	8/24/16; SUPPL-19
hydromorphone HCL	extended-release tablet	ANDA 204278	8/24/16; SUPPL-6
oxymorphone HCl	extended-release tablet	ANDA 203506	8/24/16; SUPPL-4
morphine sulfate	extended-release capsule	ANDA 202718	8/24/16; SUPPL-4
methadone HCL	tablet	ANDA 90065	8/23/16- SUPPL-4
methadone HCL	tablet	ANDA 203502	9/15/16; SUPPL-2
morphine sulfate	extended-release tablet	ANDA 203602	8/23/16; SUPPL-4

morphine sulfate	extended-release capsule	ANDA 200411	8/26/16; SUPPL-3
hydromorphone HCL	extended-release tablet	ANDA 205629	9/6/16; SUPPL-1
morphine sulfate	extended-release tablet	ANDA 205634	9/8/16; SUPPL-1
morphine sulfate	extended-release tablet	ANDA 91357	8/23/16; SUPPL-1

1 INTRODUCTION

The purpose of this review is to document the Division of Risk Management's (DRISK) final review of the proposed modification to the single, shared system (SSS) risk evaluation and mitigation strategy (REMS) for the extended-release and long-acting (ER/LA) opioid analgesics,¹ or 'ER/LA opioids', initially received between August 17 - September 15, 2016.

The proposed modifications to the ER/LA Opioid Analgesics REMS (ER/LA REMS) consist of revisions to the *FDA Blueprint for Prescriber Education for ER/LA Opioid Analgesic (FDA Blueprint)*, an ER/LA REMS appended material, to relocate the ER/LA products product specific information to the following FDA.gov website:

<http://www.fda.gov/downloads/Drugs/DrugSafety/InformationbyDrugClass/UCM515636.pdf>

1.1 BACKGROUND

The ER/LA REMS includes ER/LA opioid brand name and generic products formulated with the active ingredients: buprenorphine, fentanyl, hydrocodone, hydromorphone, methadone, morphine, oxycodone, oxymorphone, and tapentadol. ER/LA opioids are approved for the management of pain severe enough to require daily, around-the-clock, long-term opioid treatment and for which alternative treatment options are inadequate. Although, all opioid formulations have the potential for misuse, abuse, overdose and death, the Agency believes that ER/LA opioids possess a significant safety concern because they contain more opioid per tablet, capsule, film, or patch, and either stay in the body longer or are released into the body over longer periods of time. Additionally, when the extended-release features of some of these formulations are manipulated, either deliberately or inadvertently, these products deliver high doses of opioid in an immediate-release manner, potentially resulting in overdose.

As described in DRISK's July 6, 2012 Final REMS review, in accordance with section 505-1 of the FDCA, the Agency determined that a REMS is necessary for ER/LA opioid analgesics to ensure that the benefits of the drug continue to outweigh the risks of adverse outcomes (addiction, unintentional overdose, and death) resulting from inappropriate prescribing, abuse, and misuse. Additionally, in the interest of public health and to minimize the burden on the healthcare delivery system of having multiple unique REMS programs, a SSS should be used to implement the REMS for all members of the class.

The ER/LA REMS is a SSS and was originally approved on July 9, 2012. The ER/LA REMS has undergone class-wide REMS modifications four times since approval: April 15, 2013, August 19, 2014, June 26, 2015 and April 20, 2016. These modifications included revisions to the ERLA REMS appended materials to add new approved ER/LA product information or to revise the information to reflect approved PI changes for approved ER/LA products. The goals and elements of the REMS have not changed since approval of the REMS in July 2012.

The manufacturers of ER/LA opioid analgesics are collectively referred to as the REMS Program Companies (RPC).

¹ The branded and generic drug products subject to this REMS include *all*: a) extended-release, oral-dosage forms containing: hydrocodone, hydromorphone, morphine, oxycodone, oxymorphone, or tapentadol; b) fentanyl and buprenorphine-containing transdermal delivery systems; *and* c) methadone tablets and solutions that are indicated for use as analgesics.

The goal of the ER/LA REMS is to reduce serious adverse outcomes resulting from inappropriate prescribing, misuse, and abuse of ER/LA opioid analgesics while maintaining patient access to pain medications. Adverse outcomes of concern include addiction, unintentional overdose, and death. The ER/LA REMS consists of a Medication Guide (MG), elements to assure safe use (ETASU), and a timetable for submission of assessments of the REMS.

The ETASU includes a training program for prescribers that is not linked to distribution. The tools used to support the ETASU include continuing education (CE) programs by CE providers on the safe use of ER/LA opioids, letters for prescribers and professional organizations to inform them about the program, a patient counseling document, and a REMS website. The timetable for submission of assessments is at 6 months and 12 months after the initial approval date of the REMS (July 9, 2012), and annually thereafter.

1.2 REGULATORY HISTORY

Following is an overview of the regulatory history for the proposed ER/LA REMS specific for this modification:

April 20, 2016: The Agency approved a class-wide ER/LA REMS modification which included changes made to the ER/LA Opioid REMS based on the addition of product-specific information related to titration and pediatric dosing for OxyContin as well as recent approvals of MorphaBond (NDA206544) and Belbuca (NDA 207932).

April 26, 2016: The Agency approved Xtampza ER (oxycodone hydrochloride) as a part of the ER/LA REMS.

August 19, 2016: The Agency approved Troxyca ER (oxycodone hydrochloride/naltrexone hydrochloride) as a part of the ER/LA REMS.

August 17 - September 15, 2016: All of the RPC submitted proposed major REMS modifications for their approved NDA and ANDA applications (see Table 1). These submissions are the subject of this review.

2 MATERIALS REVIEWED

2.1 SPONSOR'S SUBMISSIONS

See the table starting on page one of this review for a complete list of submissions for this REMS modification.

2.2 OTHER MATERIALS INFORMING OUR REVIEW

- ER/LA Opioid Analgesic REMS, approved April 20, 2016.

3 RESULTS OF REVIEW OF THE PROPOSED ER/LA REMS MODIFICATION

3.1 RATIONALE FOR THE PROPOSED REMS MODIFICATION

The purpose of this ER/LA REMS modification is to relocate the ER/LA product specific information currently located in the ERLA REMS *FDA Blueprint for Prescriber Education on ER/LA Opioid Analgesics (FDA Blueprint)* at REMS@FDA to the following FDA.gov website: <http://www.fda.gov/downloads/Drugs/DrugSafety/InformationbyDrugClass/UCM515636.pdf>. Specifically, the section of the *FDA Blueprint* table titled "*Specific Drug Information for*

Extended-Release and Long-Acting Opioid Analgesics" will now be maintained and updated by the FDA on the FDA.gov website based on the individual product approved prescribing information.

This REMS modification will improve efficiency when new product information for an ER/LA opioid analgesic needs to be added to the FDA blueprint. This REMS modification is administrative and is intended to decrease the burden on ER/LA Sponsors and the time for the Agency to update the blueprint by eliminating the need for class-wide REMS modifications every time a new ER/LA NDA or a new strength of an ANDA is approved by the Agency. Currently, when a new ER/LA opioid analgesic NDA or a new intermediate strength of an ANDA is approved, all ER/LA opioid analgesic sponsors are required to submit class-wide REMS modifications to include the new product. These class-wide modifications must then be reviewed and approved by the FDA. Once this ER/LA REMS modification is implemented, it will decrease the number of class-wide ER/LA REMS modifications since new NDA approvals or the approval of a new strength for an ANDA will no longer prompt an ER/LA REMS modification.

3.2 PROPOSED REMS MODIFICATIONS

3.2.1 GOALS

There are no proposed changes to the goals of the REMS.

3.2.2 MEDICATION GUIDE (MG)

There are no proposed changes to the MGs for individual products.

3.2.3 ELEMENTS TO ASSURE SAFE USE

3.2.3.1 REMS DOCUMENT

There are no proposed changes to the REMS document.

3.2.3.2 REMS APPENDED MATERIAL

3.2.3.2.1 ERLA REMS BLUEPRINT

The RPC has proposed to revise the section of the *FDA Blueprint* table titled *Specific Drug Information for Extended-Release and Long-Acting Opioid Analgesics* to be blank and to add the following language to the top of the *FDA Blueprint*.

The completed table can be found at <http://www.fda.gov/downloads/Drugs/DrugSafety/InformationbyDrugClass/UCM515636.pdf>. The product specific information contained in the section titled **Specific Drug Information for Extended-Release and Long-Acting Opioid Analgesics (ER/LA opioid analgesics)** is maintained and updated by the Food and Drug Administration based on each individual product's approved Prescribing Information.

Reviewer comment: This proposed modification is acceptable to the Agency.

This revision is administrative and will not impact the information continuing education (CE) providers are required to cover in RPC funded CE programs. Individual NDA holders will continue to work with the FDA during review of their application to agree on the information for their product that will be contained in the FDA Blueprint section titled "Specific Drug Information for Extended-Release and Long-Acting Opioid Analgesics" on the FDA.gov website.

Previously, the URL for the Blueprint located at REMS@FDA changed every time a REMS modification was approved with a revised FDA Blueprint. Therefore, the RPC had to update their link of the FDA Blueprint on the ER/LA REMS website (<http://ce.er-la-opioidrems.com/lwgCEUI/rems/ce.action>) and in the Prescriber Letter #3. The ERLA REMS website has always contained a link to the FDA Blueprint on the REMS@FDA website and has never contained a PDF version of the FDA Blueprint since the Blueprint has always been managed by the FDA. After approval of this modification, the FDA Blueprint with the complete table will always be available for stakeholders at the following FDA.gov website URL that will never change:

<http://www.fda.gov/downloads/Drugs/DrugSafety/InformationbyDrugClass/UCM515636.pdf>

3.2.3.2.2 ERLA REMS PRESCRIBER LETTER #3

The Sponsor has proposed to update the URL in this letter to reflect the following new permanent location of the *FDA Blueprint* on the following FDA.gov website:

<http://www.fda.gov/downloads/Drugs/DrugSafety/InformationbyDrugClass/UCM515636.pdf>

Reviewer comment: This proposed modification is acceptable to DRISK.

3.2.4 TIMETABLE FOR SUBMISSION OF ASSESSMENTS

There are no proposed changes to the Timetable for Submission of Assessments.

3.3 REMS ASSESSMENT PLAN

There are no proposed changes to the REMS Assessment Plan.

3.4 REMS SUPPORTING DOCUMENT

The RPC proposed the addition of new member companies to the cover page of the supporting document.

Reviewer comments: DRISK agrees with the changes to this document.

4 DISCUSSION AND CONCLUSION

DRISK finds the proposed REMS modification for the ER/LA Opioid Analgesics REMS, as submitted by all the Sponsors between August 17, 2016 and September 15, 2016, acceptable. The timetable for submission of assessments of the REMS and the REMS assessment plan will remain the same as that approved on July 9, 2012. Therefore, the modified ER/LA Opioid Analgesic REMS is acceptable to DRISK.

5 RECOMMENDATIONS

DRISK recommends approval of the REMS Modification for ER/LA Opioid Analgesic REMS received August 17 - September 15, 2016 and appended to this review. The Approval Letter should reference the REMS assessment plan included with the July 9, 2012 REMS approval.

ATTACHMENTS

1. REMS Document and REMS appended materials

Initial REMS Approval: 07/2012
Most Recent Modification: XX/XXXX

**EXTENDED-RELEASE (ER) AND LONG-ACTING (LA) OPIOID
ANALGESICS RISK EVALUATION AND MITIGATION
STRATEGY (REMS)**

GOAL

The goal of this REMS is to reduce serious adverse outcomes resulting from inappropriate prescribing, misuse, and abuse of extended-release or long-acting (ER/LA) opioid analgesics while maintaining patient access to pain medications. Adverse outcomes of concern include addiction, unintentional overdose, and death.

I. REMS ELEMENTS

A. Medication Guide

A Medication Guide will be dispensed with each ER/LA opioid analgesic prescription in accordance with 21 CFR § 208.24.

The Medication Guides for ER/LA opioids are part of the ER/LA Opioid Analgesic REMS program and will be available through the ER/LA Opioid Analgesic REMS website (www.ER-LA-opioidREMS.com).

B. Elements to Assure Safe Use

1. Training will be made available to healthcare providers who prescribe ER/LA opioid analgesics.
 - a. Training will be considered “REMS-compliant training” under this REMS if: 1) it, for training provided by CE providers, is offered by an accredited provider to licensed prescribers, 2) it includes all elements of the [FDA Blueprint for Prescriber Education for Extended-Release and Long-Acting Opioid Analgesics \(“FDA Blueprint”\)](#), 3) it includes a knowledge assessment of all of the sections of the FDA Blueprint, and 4) it is subject to independent audit to confirm that conditions of the REMS training have been met.
 - b. The NDA/ANDA holders of ER/LA opioid analgesic products (“NDA/ANDA holders”) will ensure that REMS-compliant training is made available to prescribers of ER/LA opioid analgesics and will achieve the following performance goals:
 - i. Not later than March 1, 2013, the first REMS-compliant training will be made available.
 - ii. Within two years from the time the first REMS-compliant training becomes available, 80,000 prescribers (based on 25% of the 320,000 active prescribers in 2011) will have been trained;
 - iii. Within three years from the time the first REMS-compliant training becomes available, 160,000 prescribers (based on 50% of the 320,000 active prescribers in 2011) will have been trained;
 - iv. Within four years from the time the first REMS-compliant training becomes available, 192,000 prescribers (based on 60%

of the 320,000 active prescribers in 2011) will have been trained.

- c. The content of the REMS-compliant training will be based on the learning objectives established by the [FDA Blueprint](#). The FDA Blueprint contains core messages to be conveyed to prescribers in the training about the risks and appropriate prescribing practices for the safe use of ER/LA opioid analgesics. The NDA/ANDA holders will direct providers of REMS-compliant training to the FDA Blueprint, via the REMS website (www.ER-LA-opioidREMS.com), and via its Request for Grant Applications. No less than annually, NDA/ANDA holders will direct providers of REMS-compliant training to consult the FDA Blueprint for possible revisions (e.g., changes to the drug specific information).
- d. NDA/ANDA holders will ensure that independent audits of the educational materials used by the providers of REMS-compliant training are conducted. The audits must:
 - i. Be conducted by an auditor independent of the NDA/ANDA holders. (Accreditation bodies of CE providers would be considered independent of the NDA/ANDA holders and would be eligible to conduct the audits.)
 - ii. Evaluate:
 - 1. whether the content of the training covers all components of the [FDA Blueprint](#) approved as part of the REMS;
 - 2. whether the knowledge assessment measures knowledge of all sections of the FDA Blueprint; and
 - 3. for training conducted by CE providers, whether the training was conducted in accordance with the standards for CE of the Accreditation Council for Continuing Medication Education[®] (ACCME[®]), or of another CE accrediting body appropriate to the prescribers' medical specialty or healthcare profession.
 - iii. Be conducted on a random sample of 1) at least 10% of the training funded by the NDA/ANDA holders, and 2) REMS-compliant training not funded by the NDA/ANDA holders but that will be counted towards meeting the performance goals in section [B.1.b](#).
- e. To facilitate prescriber awareness of the availability of the REMS and REMS-compliant training, within 30 calendar days of the approval of the REMS, the NDA/ANDA holders will make available, and then

maintain a web site that will contain information about the REMS specified below (www.ER-LA-opioidREMS.com):

- i. A current list of the REMS-compliant training that is supported by educational grants from the NDA/ANDA holders, when this information becomes available.
 - ii. A copy of the Patient Counseling Document (PCD) on Extended-Release/Long-Acting Opioid Analgesics.
 - iii. A copy of the Prescriber Letters 1, 2, and 3 (when mailed and for at least one year thereafter) (see section B.1.f).
- f. To make prescribers aware of the existence of the REMS and the prescriber training that will be made available under the REMS, the NDA/ANDA holders will electronically deliver (email or fax), or directly mail letters to all DEA-registered prescribers who are registered to prescribe Schedule II and III drugs:
 - i. [Prescriber Letter 1](#) will be sent not later than 60 days after the initial approval of this REMS, notifying prescribers of the existence of the REMS and the fact that prescriber training will be offered, and providing a copy of the [Patient Counseling Document \(PCD\)](#).
 - ii. [Prescriber Letter 2](#) will be sent not later than 30 days before the first prescriber REMS-compliant training required by the REMS is offered by providers and will notify prescribers of the imminent upcoming availability of accredited REMS CE courses.
 - iii. The prescribers will be identified via the DEA Registration Database.
 - iv. At least annually from the date of initial approval of the REMS, the DEA Registration Database will be reviewed and [Prescriber Letter 3](#) will be sent to all newly DEA-registered prescribers who are registered to prescribe Schedule II and III drugs to inform them of the existence of the REMS, provide them the [Patient Counseling Document \(PCD\)](#), and notify them of the availability of the REMS-compliant training and how to find REMS-compliant courses.
- g. To further ensure that prescribers are aware of the existence of the ER/LA Opioid Analgesic REMS and the prescriber training that will be made available under the REMS, the NDA/ANDA holders will electronically deliver (email or fax), or directly mail the following two letters to the professional organizations and state licensing entities listed in section [B.1.g.iii](#) with a request that the information be disseminated to their members:

- i. [Professional Organization/Licensing Board Letter 1](#) will be sent not later than 60 days after the approval of this REMS, notifying prescribers of the existence of the REMS and the fact that prescriber training will be offered, and providing a copy of the [Patient Counseling Document \(PCD\) on Extended-Release/Long-Acting Opioids](#).
- ii. [Professional Organization/Licensing Board Letter 2](#) will be sent not later than 30 days before the first prescriber REMS-compliant training required by the REMS is offered by providers and will notify prescribers of the imminent upcoming availability of accredited REMS CE courses.
- iii. The letter and enclosures referenced above, will be sent to the following entities:
 - a) State Licensing Boards of:
 - 1) Medicine (allopathic and osteopathic)
 - 2) Nursing
 - 3) Dentistry
 - b) Associations of State Licensing Boards:
 - 1) Federation of State Medical Boards
 - 2) National Council of State Boards of Nursing
 - 3) American Association of Dental Boards
 - c) Learned Societies and Professional Associations, including, but not limited to:
 - 1) American Academy of Addiction Psychiatry
 - 2) American Academy of Family Physicians
 - 3) American Academy of Hospice and Palliative Medicine
 - 4) American Academy of Neurology
 - 5) American Academy of Nurse Practitioners
 - 6) American Academy of Nursing
 - 7) American Academy of Orofacial Pain
 - 8) American Academy of Pain Management
 - 9) American Academy of Pain Medicine
 - 10) American Academy of Physical Medicine and Rehabilitation
 - 11) American Academy of Physician Assistants

- 12) American Association of Colleges of Osteopathic Medicine
- 13) American Association of Colleges of Nursing
- 14) American Association of Poison Control Centers
- 15) American Board of Medical Specialties
- 16) American Board of Orofacial Pain
- 17) American College of Nurse Practitioners
- 18) American College of Osteopathic Family Physicians
- 19) American College of Physicians
- 20) American College of Rheumatology
- 21) American Dental Association
- 22) American Dental Education Association
- 23) American Medical Association
- 24) American Medical Directors Association
- 25) American Nurses Association
- 26) American Nurses Credentialing Center
- 27) American Osteopathic Association
- 28) American Osteopathic Association of Addiction Medicine
- 29) American Pain Society
- 30) American Society of Addiction Medicine
- 31) American Society for Pain Management Nursing
- 32) American Society of Anesthesiologists
- 33) American Society of Pain Educators
- 34) Association of American Medical Colleges
- 35) Council of Medical Specialty Societies
- 36) Hospice and Palliative Nurses Association
- 37) National Association of Managed Care Physicians
- 38) National Association of State Controlled Substances Authorities
- 39) National Commission on Certification of Physician Assistants
- 40) National Hospice and Palliative Care Organization
- 41) American College of Emergency Physicians

42) Society of Emergency Medicine Physician Assistants

- h. NDA/ANDA holders will ensure that an interim single toll-free number call center is implemented no later than July 23, 2012, and a fully operational centralized call center is implemented no later than 90 calendar days after the approval of the REMS.

The following materials are part of the ER/LA Opioid Analgesic REMS and are appended:

- [Patient Counseling Document \(PCD\) on Extended-Release/Long-Acting Opioid Analgesics](#)
- [FDA Blueprint for Prescriber Education for Extended-Release and Long-Acting Opioid Analgesics](#)
- [Prescriber Letter 1](#)
- [Prescriber Letter 2](#)
- [Prescriber Letter 3](#)
- [Professional Organization/Licensing Board Letter 1](#)
- [Professional Organization/Licensing Board Letter 2](#)
- [ER/LA Opioid Analgesic REMS website \(www.ER-LA-opioidREMS.com\)](#)

II. Implementation System

The ER/LA Opioid Analgesic REMS can be approved without the Elements to Assure Safe Use specifically described under FDCA 505-1(f)(3) (B), (C), and (D) of the Act; therefore an implementation system is not required.

III. Timetable for Submission of Assessments

REMS assessments will be submitted to the FDA at 6 months and 12 months after the initial approval date of the REMS (July 9, 2012), and annually thereafter. To facilitate inclusion of as much information as possible, while allowing reasonable time to prepare the submission, the reporting interval covered by each assessment will conclude no earlier than 60 days before the submission date for that assessment. The NDA holders will submit each assessment so that it will be received by the FDA on or before the due date based on the initial approval date of the REMS.

Introduction for the FDA Blueprint for Prescriber Education for Extended-Release and Long-Acting Opioid Analgesics

In April 2011, FDA announced the elements of a Risk Evaluation and Mitigation Strategy (REMS) to ensure that the benefits of extended-release and long-acting (ER/LA) opioid analgesics outweigh the risks. The REMS supports national efforts to address the prescription drug abuse epidemic.

As part of the REMS, all ER/LA opioid analgesic companies must provide:

- Education for prescribers of these medications, which will be provided through accredited continuing education (CE) activities supported by independent educational grants from ER/LA opioid analgesic companies.
- Information that prescribers can use when counseling patients about the risks and benefits of ER/LA opioid analgesic use.

FDA developed core messages to be communicated to prescribers in the Blueprint for Prescriber Education (FDA Blueprint), published the draft FDA Blueprint for public comment, and considered the public comments when finalizing the FDA Blueprint. This final FDA Blueprint contains the core educational messages. It is approved as part of the ER/LA Opioid Analgesic REMS and will remain posted on the FDA website for use by CE providers to develop the actual CE activity. A list of all REMS-compliant CE activities that are supported by independent educational grants from the ER/LA opioid analgesic companies to accredited CE providers will be posted at www.ER-LA-opioidREMS.com as that information becomes available.

The CE activities provided under the FDA Blueprint will focus on the safe prescribing of ER/LA opioid analgesics and consist of a core content of about three hours. The content is directed to prescribers of ER/LA opioid analgesics, but also may be relevant for other healthcare professionals (e.g., pharmacists). The course work is not intended to be exhaustive nor a substitute for a more comprehensive pain management course.

Accrediting bodies and CE providers will ensure that the CE activities developed under this REMS will be in compliance with the standards for CE of the Accreditation Council for Continuing Medical Education (ACCME) ^{1,2} or another CE accrediting body as appropriate to the prescribers' medical specialty or healthcare profession.

For additional information from FDA, including more detailed Questions and Answers about the REMS for ER/LA Opioid Analgesics, see <http://www.fda.gov/Drugs/DrugSafety/InformationbyDrugClass/ucm163647.htm>.

¹Accreditation Council for Continuing Medical Education. 2016. *Accreditation Requirements. Criteria for CME Providers-Accreditation Criteria*. Accessed on July 20, 2016.

²Accreditation Council for Continuing Medical Education. 2016. *Accreditation Requirements. Criteria for CME Providers-Standards for Commercial Support*. Accessed on July 20, 2016.

FDA Blueprint for Prescriber Education for Extended-Release and Long-Acting Opioid Analgesics

Why Prescriber Education is Important

Health care professionals who prescribe extended-release (ER) and long-acting (LA) opioid analgesics (hereafter referred to as ER/LA opioid analgesics) are in a key position to balance the benefits of prescribing ER/LA opioid analgesics to treat pain against the risks of serious adverse outcomes including addiction, unintentional overdose, and death. Opioid misuse and abuse, resulting in injury and death, has emerged as a major public health problem.

- Based on the 2010 National Survey on Drug Use and Health, public health experts estimate more than 35 million Americans age 12 and older used an opioid analgesic for non-medical use some time in their life—an increase from about 30 million in 2002.³
- In 2009, there were nearly 343,000 emergency department visits involving nonmedical use of opioid analgesics.⁴
- In 2008, nearly 36,500 Americans died from drug poisonings, and of these, nearly 14,800 deaths involved opioid analgesics.⁵
- Improper use of any opioid can result in serious side effects including overdose and death, and this risk can be greater with ER/LA opioid analgesics.

Appropriate prescribing practices and patient education are important steps to help address this public health problem. Health care professionals who prescribe ER/LA opioid analgesics have a responsibility to help ensure the safe and effective use of these drug products. ER/LA opioid analgesics should be prescribed only by health care professionals who are knowledgeable in the use of potent opioids for the management of pain.

The expected results of the prescriber education in this REMS are that the prescribers will:

- a. Understand how to assess patients for treatment with ER/LA opioid analgesics.
- b. Be familiar with how to initiate therapy, modify dose, and discontinue use of ER/LA opioid analgesics.
- c. Be knowledgeable about how to manage ongoing therapy with ER/LA opioid analgesics.
- d. Know how to counsel patients and caregivers about the safe use of ER/LA opioid analgesics, including proper storage and disposal.
- e. Be familiar with general and product-specific drug information concerning ER/LA opioid analgesics.

I. Assessing Patients for Treatment with ER/LA Opioid Analgesic Therapy

- a. Prescribers should consider risks involved with ER/LA opioid analgesics and balance these against potential benefits. Risks include:
 - i. Overdose with ER/LA formulations, as most dosage units contain more opioid than immediate-release formulations.

³Substance Abuse and Mental Health Services Administration. 2011. *Results from the 2010 National Survey on Drug Use and Health: Detailed Table*, Table 7.1.a. Rockville, MD. <http://www.samhsa.gov/data/NSDUH/2k10NSDUH/tabs/Sect7peTabs1to45.htm#Tab7.1A>. Accessed on July 20, 2016.

⁴Substance Abuse and Mental Health Services Administration. 2011. *Drug Abuse Warning Network, 2009: National Estimates of Drug-Related Emergency Department Visits*, Table 19. Rockville, MD. <http://www.samhsa.gov/data/2k11/DAWN/2k9DAWNED/HTML/DAWN2k9ED.htm#Tab19>. Accessed on July 20, 2016.

⁵Warner M, Chen LH, Makuc DM, Anderson RN, and Miniño AM. 2011. Drug Poisoning Deaths in the United States, 1980–2008, in U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, National Center for Health Statistics, *NCHS Data Brief, No 81*. December 2011. Hyattsville, MD. <http://www.cdc.gov/nchs/data/databriefs/db81.pdf>. Accessed on July 20, 2016.

- ii. Life-threatening respiratory depression
 - iii. Abuse by patient or household contacts
 - iv. Misuse and addiction.
 - v. Physical dependence and tolerance.
 - vi. Interactions with other medications and substances (See [table in Section VI](#) for product-specific information).
 - vii. Risk of neonatal opioid withdrawal syndrome with prolonged use during pregnancy.
 - viii. Inadvertent exposure/ingestion by household contacts, especially children.
- b. Prescribers should assess each patient's risk of abuse, including substance use and psychiatric history. Prescribers should:
- i. Obtain a complete history and conduct a complete physical examination. The history should include assessment for a family history of substance abuse and psychiatric disorders, as well as special considerations regarding dose and adverse effects in geriatric patients, pregnant women, and children.
 - A history of substance abuse does not prohibit treatment with ER/LA opioid analgesics but may require additional monitoring and expert consultation.
 - ii. Be knowledgeable about risk factors for opioid abuse.
 - iii. Understand and appropriately use screening tools for addiction or abuse to help assess potential risks associated with chronic opioid therapy and to help manage patients using ER/LA opioid analgesics (e.g., structured interview tools).
 - iv. Adequately document all patient interactions and treatment plans.
- c. Prescribers should understand when to appropriately refer high risk patients to pain management specialists.
- d. Prescribers should understand opioid tolerance criteria as defined in the product labeling.
 - Prescribers should know which products and which doses are indicated for use only in opioid-tolerant patients. (See [table in Section VI](#) for product-specific information).

II. Initiating Therapy, Modifying Dosing, and Discontinuing Use of ER/LA Opioid Analgesics

- a. Prescribers should have awareness of federal and state regulations on opioid prescribing.
- b. Prescribers should be aware that:
 - i. Dose selection is critical, particularly when initiating therapy in opioid non-tolerant patients.
 - ii. Some ER/LA opioid analgesics are only appropriate for opioid-tolerant patients. (See [table in Section VI](#) for product-specific information)
 - iii. Dosage should be individualized in every case.
 - iv. Titration should be based on efficacy and tolerability. (See individual product labeling)
- c. Prescribers should be knowledgeable about when and how to supplement pain management with immediate-release analgesics, opioids and non-opioids.
- d. Prescribers should be knowledgeable about converting patients from immediate-release to ER/LA opioid products and from one ER/LA opioid product to another ER/LA opioid product.
- e. Prescribers should understand the concept of incomplete cross-tolerance when converting patients from one opioid to another.
- f. Prescribers should understand the concepts and limitations of equianalgesic dosing and follow patients closely during all periods of dose adjustments.

- g. Prescribers should understand the warning signs and symptoms of significant respiratory depression from opioids and monitor patients closely, especially at the time of treatment initiation and dose increases.
- h. Prescribers should understand that tapering the opioid dose is necessary to safely discontinue treatment with ER/LA opioid analgesics when therapy is no longer needed.

III. Managing Therapy with ER/LA Opioid Analgesics

- a. Prescribers should establish analgesic and functional goals for therapy and periodically evaluate pain control, functional outcomes, side-effect frequency and intensity, and health-related quality of life.
- b. Prescribers should be aware of the existence of Patient Prescriber Agreements (PPAs).
 - i. PPAs are documents signed by both prescriber and patient at the time an opioid is prescribed.
 - ii. PPAs can help ensure patients and caregivers understand the goals of treatment, the risks, and how to use the medications safely.
 - iii. PPAs can include commitments to return for follow-up visits, to comply with appropriate monitoring (such as random drug testing), and to safeguard the medication.
- c. Prescribers should monitor patient adherence to the treatment plan, especially with regard to misuse and abuse by:
 - i. Recognizing, documenting, and addressing aberrant drug-related behavior.
 - ii. Utilizing state Prescription Drug Monitoring Programs, where practical, to identify behaviors that may represent abuse.
 - iii. Understanding the utility and interpretation of drug testing (e.g., screening and confirmatory tests), and using it as indicated.
 - iv. Screening and referring for substance abuse treatment as indicated.
 - v. Performing medication reconciliation as indicated.
- d. Prescribers should understand how to anticipate and manage adverse events associated with ER/LA opioid analgesics.
- e. Prescribers should be aware that there are no adequate and well-controlled studies of ER/LA opioid analgesics in pregnant women. ER/LA opioid analgesics should be used during pregnancy only if the potential benefit justifies the risk to the fetus.
- f. Prescribers should be aware of the pregnancy status of their patients. If opioid use is required for a prolonged period in a pregnant woman, prescribers should advise the patient of the risk of neonatal opioid withdrawal syndrome and ensure that appropriate treatment will be available.
- g. Prescribers treating patients with ER/LA opioid analgesics should periodically assess benefits and side effects of these drugs, and the continued need for opioid analgesics.
- h. Prescribers should understand the need for reevaluation of patient's underlying medical condition if the clinical presentation changes over time.
- i. Prescribers should be familiar with referral sources for the treatment of abuse or addiction that may arise from the use of ER/LA opioid analgesics.

IV. Counseling Patients and Caregivers about the Safe Use of ER/LA Opioid Analgesics

- a. Prescribers should use the Patient Counseling Document as part of the discussion when prescribing opioid analgesics.

- b. Prescribers should explain product-specific information about the prescribed ER/LA opioid analgesic.
- c. Prescribers should explain how to take the ER/LA opioid analgesic as prescribed.
- d. Prescribers should explain the importance of adherence to dosing regimen, how to handle missed doses, and to contact their prescriber should pain not be controlled.
- e. Prescribers should inform patients and caregivers to read the specific ER/LA opioid analgesic Medication Guide they receive from the pharmacy.
- f. Prescribers should warn patients and caregivers that under no circumstances should an oral ER/LA opioid analgesic be broken, chewed or crushed. In addition, patches and buccal films should not be cut, torn, or damaged prior to use. Manipulating the ER/LA opioid analgesic described above may lead to rapid release of the ER/LA opioid analgesic causing overdose and death. When a patient cannot swallow a capsule whole, prescribers should refer to the product labeling to determine if it is appropriate to sprinkle the contents of a capsule on applesauce or administer via a feeding tube.
- g. Prescribers should caution patients and caregivers that the use of other CNS depressants such as sedative-hypnotics and anxiolytics, alcohol, or illegal drugs with ER/LA opioid analgesics can cause overdose and death. Patients and caregivers should be instructed to only use other CNS depressants, including other opioids, under the instruction of their prescriber.
- h. Prescribers should instruct patients and caregivers to tell all of their doctors about all medications the patient is taking.
- i. Prescribers should warn patients and caregivers not to abruptly discontinue or reduce the ER/LA opioid analgesic and discuss how to safely taper the dose when discontinuing.
- j. Prescribers should caution patients and caregivers that ER/LA opioid analgesics can cause serious side effects that can lead to death, even when used as recommended. Prescribers should counsel patients and caregivers on the risk factors, signs, and symptoms of overdose and opioid-induced respiratory depression, gastrointestinal obstruction, and allergic reactions.
- k. Prescribers should counsel patients and caregivers on the most common side effects of ER/LA opioid analgesics, and about the risk of falls, working with heavy machinery, and driving.
- l. Patients or caregivers should call their prescriber for information about managing side effects.
- m. Prescribers should explain to patients and caregivers that sharing ER/LA opioid analgesics with others may cause them to have serious side effects including death, and that selling or giving away ER/LA opioid analgesics is against the law.
- n. Prescribers should counsel patients and caregivers to store ER/LA opioid analgesics in a safe and secure place away from children, family members, household visitors, and pets.
- o. Prescribers should warn patients and caregivers that ER/LA opioid analgesics must be protected from theft.
- p. Prescribers should counsel patients and caregivers to dispose of any ER/LA opioid analgesics when no longer needed by flushing them down the toilet.
- q. Prescribers should counsel patients and caregivers to inform them about side effects.
- r. Adverse events should be reported to the FDA at 1-800-FDA-1088 or via <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM163919.pdf>.

V. General Drug Information for ER/LA Opioid Analgesic Products

Prescribers should be knowledgeable about general characteristics, toxicities, and drug interactions for ER/LA opioid analgesic products. For example,

- a. ER/LA opioid analgesic products are scheduled under the Controlled Substances Act and can be misused and abused.
- b. Respiratory depression is the most important serious adverse effect of opioids as it can be immediately life-threatening.
- c. Constipation is the most common long-term side effect and should be anticipated.
- d. Drug-drug interaction profiles vary among the products. Knowledge of particular opioid-drug interactions, and the underlying pharmacokinetic and pharmacodynamic mechanisms, allows for the safer administration of opioid analgesics.
 - i. Central nervous system depressants (alcohol, sedatives, hypnotics, tranquilizers, tricyclic antidepressants) can have a potentiating effect on the sedation and respiratory depression caused by opioids.
 - ii. Some ER opioid formulations may rapidly release opioid (dose dump) when exposed to alcohol. Some drug levels may increase without dose dumping when exposed to alcohol. See individual product labeling.
 - iii. Using opioids with monoamine oxidase inhibitors (MAOIs) may result in possible increase in respiratory depression. Using certain opioids with MAOIs may cause serotonin syndrome.
 - iv. Opioids can reduce the efficacy of diuretics by inducing the release of antidiuretic hormone (ADH).
 - v. Some opioids (methadone, buprenorphine) can prolong the QTc interval.
 - vi. Concomitant drugs that act as inhibitors or inducers of various cytochrome P450 enzymes can result in higher or lower than expected blood levels of some opioids.
 - vii. See [table in Section VI](#) for product-specific information.
- e. Tolerance to sedating and respiratory-depressant effects of opioids is critical to the safe use of ER/LA opioid analgesics.
 - i. For ER products, patients must meet the criteria for opioid tolerance, described in the [table in Section VI](#), before using:
 - a. certain products,
 - b. certain strengths,
 - c. certain daily doses, and
 - d. in specific indicated patient populations (e.g., pediatric patients).
 - ii. See the [table in Section VI](#) for product-specific information.
- f. ER/LA opioid analgesic tablets must be swallowed whole. ER/LA opioid analgesic capsules should be swallowed intact or when necessary, the pellets from some capsules can be sprinkled on applesauce and swallowed without chewing.
- g. For transdermal products, external heat, fever, and exertion can increase absorption of the opioid, leading to fatal overdose. Transdermal products with metal foil backings are not safe for use in MRIs.
- h. For buccal film products, the film should not be applied if it is cut, damaged, or changed in any way. Use the entire film.
 - i. Follow the instructions for conversion in the Dosage and Administration section (2.1) in the *Prescribing Information* of each product when converting patients from one opioid to another.

VI. Specific Drug Information for ER/LA Opioid Analgesic Products

Prescribers should be knowledgeable about specific characteristics of the ER/LA opioid analgesic products they prescribe, including the drug substance, formulation, strength, dosing interval, key instructions, specific information about conversion between products where available, specific drug interactions, use in opioid-tolerant patients, product-specific safety concerns, and relative potency to morphine. The attached table is a reference.

The completed table can be found at <http://www.fda.gov/downloads/Drugs/DrugSafety/InformationbyDrugClass/UCM515636.pdf>. The product specific information contained in the section titled **Specific Drug Information for Extended-Release and Long-Acting Opioid Analgesics (ER/LA opioid analgesics)** is maintained and updated by the Food and Drug Administration based on each individual product's approved Prescribing Information. For detailed information, prescribers can refer to prescribing information available online via DailyMed at www.dailymed.nlm.nih.gov or Drugs@FDA at www.fda.gov/drugsatfda.

Drug Information Common to the Class of Extended-Release and Long-Acting Opioid Analgesics (ER/LA opioid analgesics)	
Dosing Interval	<ul style="list-style-type: none"> ▪ Refer to individual product information.
Key Instructions	<ul style="list-style-type: none"> ▪ Limitations of usage: <ul style="list-style-type: none"> • Reserve for use in patients for whom alternative treatment options (e.g., non-opioid analgesics or immediate-release opioids) are ineffective, not tolerated, or would be otherwise inadequate to provide sufficient management of pain. • Not for use as an as-needed analgesic. • Not for mild pain or pain not expected to persist for an extended duration. • Not for use in treating acute pain. ▪ Individually titrate to a dose that provides adequate analgesia and minimizes adverse reactions. ▪ The times required to reach steady-state plasma concentrations are product specific; refer to product information for titration interval. ▪ Continually reevaluate to assess the maintenance of pain control and the emergence of adverse reactions. ▪ During chronic therapy, especially for non-cancer-related pain, periodically reassess the continued need for opioids. ▪ If pain increases, attempt to identify the source, while adjusting the dose. ▪ When an ER/LA opioid analgesic is no longer required, gradually titrate downward to prevent signs and symptoms of withdrawal in the physically-dependent patient. Do not abruptly discontinue these products. ▪ Solid oral dosage forms: <ul style="list-style-type: none"> • Swallow tablets and capsules whole: crushing, chewing, breaking, cutting or dissolving may result in rapid release and absorption of a potentially fatal dose of opioid. • Some capsules can be opened and pellets sprinkled on applesauce for patients who can reliably swallow without chewing and used immediately. See individual product information. • Exposure of some products to alcoholic beverages or medications containing alcohol may result in the rapid release and absorption of a potentially fatal dose of opioid. • Dispose of unused product by flushing down the toilet. ▪ Transdermal dosage forms: <ul style="list-style-type: none"> • Avoid exposure to external heat. Patients with fever must be monitored for signs or symptoms of increased opioid exposure. • Location of application must be rotated. • Prepare skin by clipping, not shaving hair, and washing area only with water. ▪ Buccal film dosage form: <ul style="list-style-type: none"> • Do not use if the package seal is broken or the film is cut, damaged, or changed in any way. ▪ See individual product information for the following: <ul style="list-style-type: none"> • Dosage reduction for hepatic or renal impairment.

Drug Information Common to the Class of Extended-Release and Long-Acting Opioid Analgesics (ER/LA opioid analgesics)	
Drug Interactions Common to the Class	<ul style="list-style-type: none"> ▪ Concurrent use with other central nervous system depressants (sedatives, hypnotics, general anesthetics, antiemetics, phenothiazines, other tranquilizers, and alcohol) can increase the risk of respiratory depression, hypotension, profound sedation, or coma. Reduce the initial dose of one or both agents. ▪ Avoid concurrent use of mixed opioid agonist/antagonists (i.e., pentazocine, nalbuphine, and butorphanol) or partial opioid agonists (buprenorphine) in patients who have received or are receiving a course of therapy with a full opioid agonist. In these patients, mixed opioid agonist/antagonists and partial opioid agonists may reduce the analgesic effect and/or may precipitate withdrawal symptoms. ▪ Opioids may enhance the neuromuscular blocking action of skeletal muscle relaxants and produce an increased degree of respiratory depression. ▪ Concurrent use with anticholinergic medication increases the risk of urinary retention and severe constipation, which may lead to paralytic ileus.
Use in Opioid-Tolerant Patients	<ul style="list-style-type: none"> ▪ Adult patients considered opioid-tolerant are those receiving, for one week or longer: <ul style="list-style-type: none"> ○ at least 60 mg oral morphine/day ○ 25 mcg transdermal fentanyl/hour ○ 30 mg oral oxycodone/day ○ 8 mg oral hydromorphone/day ○ 25 mg oral oxymorphone/day ▪ Pediatric patients (11 years and older) considered opioid-tolerant are those who are already receiving and tolerating a minimum daily opioid dose of at least 20 mg oxycodone orally or its equivalent (applicable to OxyContin's pediatric indication only) ▪ See individual product information for which products: <ul style="list-style-type: none"> • Have strengths or total daily doses only for use in opioid-tolerant patients. • Are only for use in opioid-tolerant patients at all strengths.
Contraindications	<ul style="list-style-type: none"> ▪ Significant respiratory depression ▪ Acute or severe asthma in an unmonitored setting or in the absence of resuscitative equipment ▪ Known or suspected paralytic ileus ▪ Hypersensitivity (e.g., anaphylaxis) ▪ See individual product information for additional contraindications.
Relative Potency To Oral Morphine	<ul style="list-style-type: none"> ▪ These are intended as general guides. ▪ Follow conversion instructions in individual product information. ▪ Incomplete cross-tolerance and inter-patient variability require the use of conservative dosing when converting from one opioid to another - halve the calculated comparable dose and titrate the new opioid as needed.

Specific Drug Information for Extended-Release and Long-Acting Opioid Analgesics (ER/LA opioid analgesics)	
Drug Name	
Dosing Interval	
Key Instructions	
Specific Drug Interactions	
Use in Opioid-Tolerant Patients	
Product-Specific Safety Concerns	
Relative Potency to Oral Morphine	

FDA-Required REMS Program for Serious Drug Risks

Subject: Announcement of a Risk Evaluation and Mitigation Strategy (REMS) for all extended-release/long-acting opioid analgesic drug products due to their risks of misuse, abuse, addiction, and overdose.

Dear DEA-Registered Prescriber:

Extended-release and long-acting (ER/LA) opioid analgesics are approved for the management of chronic moderate-to-severe pain in the U.S., and can be safe and effective in appropriately selected patients when used as directed. However, opioid analgesics are also associated with serious risks and are at the center of a major public health crisis of increased misuse, abuse, addiction, overdose, and death.

The U.S. Food and Drug Administration (FDA) has determined that a Risk Evaluation and Mitigation Strategy (REMS) is necessary for ER/LA opioid analgesics to ensure that the benefits continue to outweigh the risks of adverse outcomes (addiction, unintentional overdose, and death) resulting from inappropriate prescribing, abuse, and misuse. A REMS is a strategy to manage a known or potential serious risk associated with a drug product. In the interest of public health and to minimize the burden on the healthcare delivery system from having multiple unique REMS programs, pharmaceutical companies subject to this REMS have joined together to implement this REMS for all ER/LA opioid analgesic drug products.

The principal components of this REMS are:

- a) Prescriber training on all ER/LA opioid analgesics,
- b) the *Patient Counseling Document on Extended-Release and Long-Acting Opioid Analgesics* (PCD), and
- c) a unique Medication Guide for each ER/LA opioid analgesic drug product.

The branded and generic drug products subject to this REMS include *all*:

- extended-release, oral-dosage forms containing
 - hydromorphone,
 - morphine,
 - oxycodone,
 - oxymorphone, or
 - tapentadol;
- fentanyl and buprenorphine-containing transdermal delivery systems; *and*
- methadone tablets and solutions that are indicated for use as analgesics.

Prescriber Action

Under the REMS, you are **strongly encouraged** to do **all** of the following:

- **Train (Educate Yourself)** - Complete REMS-compliant training offered by an accredited provider of continuing education (CE) for your discipline. This training is being developed and will be offered early next year at no or nominal cost to prescribers. You will be notified when REMS-compliant training will become available. *REMS-compliant training* will: (a) be delivered by accredited CE providers; (b) cover all elements of the FDA Blueprint for Prescriber Education for Extended-Release and Long-Acting Opioid Analgesics (“FDA Blueprint”); (c) include a post-course knowledge assessment; and (d) be subject to independent audit of content and compliance with applicable accrediting standards.
- **Counsel Your Patients** - Discuss the safe use, serious risks, storage, and disposal of ER/LA opioid analgesics with patients and their caregivers every time you prescribe these medicines. The enclosed *Patient Counseling Document on Extended-Release/Long-Acting Opioid Analgesics* (PCD) should be used to facilitate these discussions.
- **Emphasize Patient and Caregiver Understanding of the Medication Guide** - Stress to patients and their caregivers the importance of reading the Medication Guide that they will receive from their pharmacist every time an ER/LA opioid analgesic is dispensed to them, as the information in the Medication Guide may have changed.

- **Consider Using Other Tools** - In addition to the PCD, there are other publicly-available tools to improve patient, household, and community safety when using ER/LA opioid analgesics, as well as compliance with conditions of treatment, including Patient-Prescriber Agreements (PPAs) and risk assessment instruments.

REMS-compliant Training Programs

A critical component of the ER/LA Opioid Analgesics REMS program is essential safety education for prescribers. REMS-compliant training for prescribers, as described previously, will be delivered by accredited CE providers and will include both general and product-specific drug information, as well as information on weighing the benefits and risks of opioid therapy, appropriate patient selection, managing and monitoring patients, and counseling patients on the safe use of these drugs. In addition, the education will include information on how to recognize evidence of, and the potential for, opioid misuse, abuse, addiction, and overdose.

It will be some time before the REMS-compliant training funded by educational grants from the pharmaceutical companies subject to this REMS becomes available. The FDA developed core messages to be communicated to prescribers in the [FDA Blueprint for Prescriber Education for Extended-Release and Long-Acting Opioid Analgesics \("FDA Blueprint"\)](#), which will be used by accredited CE providers to develop REMS-compliant training courses. A follow-up letter notifying you of the availability of REMS-compliant training funded under this REMS will be sent not later than thirty (30) days before such training is offered. However, REMS-compliant education may also be offered by academic institutions or professional societies independent of REMS-related funding. We encourage you to successfully complete REMS-compliant training offered to improve your ability to prescribe these medications more safely.

The Patient Counseling Document on Extended-Release/Long-Acting Opioid Analgesics (PCD)

Enclosed with this letter is the Patient Counseling Document that was developed under the REMS for ER/LA opioid analgesics to assist you in having important conversations with patients for whom you select an ER/LA opioid analgesic. It contains important safety information common to the drug products subject to this REMS, and includes space for you to write additional information to help your patients use their specific ER/LA opioid analgesic safely. The PCD should be provided to the patient or their caregiver at the time of prescribing. Patients and their caregivers should be counseled on:

- the importance of taking these medicines exactly as you prescribe them,
- the need to store ER/LA opioid analgesics safely and securely – out of the reach of children, pets, and household members – to avoid risks from unintended exposure,
- the importance of not sharing these medications, even if someone has the same symptoms as the patient, *and*
- the proper methods of disposal of unneeded ER/LA opioid analgesics.

You can re-order or print additional copies of the PCD from www.ER-LA-opioidREMS.com.

Adverse Event Reporting

To report all suspected adverse reactions associated with the use of the ER/LA opioid analgesics, contact:

- the pharmaceutical company that markets the specific product, or
- the FDA MedWatch program:
 - by phone at 1-800-FDA-1088 (1-800-332-1088) or
 - online at www.fda.gov/medwatch/report.htm

More information about this REMS can be obtained at: www.ER-LA-opioidREMS.com or by calling the ER/LA Opioid Analgesic REMS Call Center at 1-800-503-0784.

Sincerely,

The ER/LA Opioid Analgesic REMS Companies

FDA-Required REMS Program for Serious Drug Risks

Subject: Availability of Risk Evaluation and Mitigation Strategy (REMS)-compliant training under the REMS for all extended-release/long-acting opioid analgesic drug products.

Dear DEA-Registered Prescriber:

Extended-release and long-acting (ER/LA) opioid analgesics¹ are approved for the management of chronic moderate-to-severe pain in the U.S., and can be safe and effective in appropriately selected patients when used as directed. However, opioid analgesics are also associated with serious risks and are at the center of a major public health crisis of increased misuse, abuse, addiction, overdose, and death. The U.S. Food and Drug Administration (FDA) determined that a Risk Evaluation and Mitigation Strategy (REMS) was necessary to ensure that the benefits of ER/LA opioid analgesics continue to outweigh the risks of adverse outcomes (addiction, unintentional overdose, and death) resulting from inappropriate prescribing, abuse, and misuse.

Several months ago, you received a letter announcing the REMS for all ER/LA opioid analgesic drug products, which explained that the principal components of this REMS are:

- a) Prescriber training on all ER/LA opioid analgesics,
- b) the *Patient Counseling Document on Extended-Release/Long-Acting Opioid Analgesics* (PCD), and
- c) a unique Medication Guide for each ER/LA opioid analgesic drug product.

REMS-compliant Training Programs

The purpose of this letter is to provide notification of the upcoming availability of REMS-compliant training on ER/LA opioid analgesics – provided at a nominal to no cost to prescribers. REMS-compliant training is a critical component of the ER/LA Opioid Analgesics REMS program and constitutes essential safety education for prescribers. *REMS-compliant training* will: (a) be delivered by accredited CE providers; (b) cover all elements of the FDA Blueprint for Prescriber Education for Extended-Release and Long-Acting Opioid Analgesics (“FDA Blueprint”); (c) include a post-course knowledge assessment; and (d) be subject to independent audit of content and compliance with applicable accrediting standards.

REMS-compliant training will focus on the safe prescribing of ER/LA opioid analgesics. The FDA developed core messages to be communicated to prescribers in the FDA Blueprint, which will be used by accredited CE providers to design and deliver REMS-compliant training courses. The FDA Blueprint is available at <http://www.fda.gov/downloads/Drugs/DrugSafety/InformationbyDrugClass/UCM277916.pdf>

The core messages include:

- Understand how to assess patients and determine which may be appropriate for treatment with ER/LA opioid analgesics.
- Be familiar with how to initiate therapy, modify dose, and discontinue use of ER/LA opioid analgesics.
- Be knowledgeable about how to manage and monitor ongoing therapy with ER/LA opioid analgesics.
- Know how to counsel patients and caregivers about the safe use of ER/LA opioid analgesics, including proper storage and disposal.
- Be familiar with general and product-specific drug information concerning ER/LA opioid analgesics.

REMS-compliant training for prescribers also includes information on weighing the benefits and risks of opioid therapy and how to recognize evidence of, and the potential for, opioid misuse, abuse, addiction, and overdose. REMS-compliant training may also be offered by academic institutions or learned societies independent of REMS-related funding. We encourage you to

¹ **The branded and generic drug products subject to this REMS include all:** a) extended-release, oral-dosage forms containing: hydromorphone, morphine, oxycodone, oxymorphone, or tapentadol; b) fentanyl and buprenorphine-containing transdermal delivery systems; *and* c) methadone tablets and solutions that are indicated for use as analgesics.

successfully complete REMS-compliant training from an accredited CE provider to improve your ability to prescribe these medications more safely.

Prescriber Action

Under the REMS, you are **strongly encouraged** to do **all** of the following:

- **Train (Educate Yourself)** - Complete REMS-compliant training on the ER/LA opioid analgesics offered by an accredited provider of continuing education (CE) for your discipline.
- **Counsel Your Patients** – Discuss the safe use, serious risks, storage, and disposal of ER/LA opioid analgesics with patients and their caregivers every time you prescribe these medicines. Use the enclosed *Patient Counseling Document on Extended-Release/Long-Acting Opioid Analgesics* (PCD) to facilitate these discussions.
- **Emphasize Patient and Caregiver Understanding of the Medication Guide** - Stress to patients and their caregivers the importance of reading the Medication Guide that they will receive from their pharmacist every time an ER/LA opioid analgesic is dispensed to them, as information may have changed.
- **Consider Using Other Tools** - In addition to the PCD, there are other publicly-available tools to improve patient, household, and community safety when using ER/LA opioids, as well as compliance with conditions of treatment, including Patient-Prescriber Agreements (PPAs) and risk assessment instruments.

A listing of REMS-compliant training funded under this REMS appears on www.ER-LA-opioidREMS.com.

The Patient Counseling Document on Extended-Release/Long-Acting Opioid Analgesics (PCD)

Enclosed with this letter is the Patient Counseling Document that was developed under the REMS for ER/LA opioid analgesics to assist you in having important conversations with patients for whom you select an ER/LA opioid analgesic. It contains important safety information common to the drug products subject to this REMS and includes space for you to write additional information to help your patients use their specific ER/LA opioid analgesic safely. The PCD should be provided to the patient or their caregiver at the time of prescribing. Patients and their caregivers should be counseled on:

- the importance of taking these medicines exactly as you prescribe them,
- the need to store ER/LA opioid analgesics safely and securely – out of the reach of children, pets, and household members – to avoid risks from unintended exposure,
- the importance of not sharing these medications, even if someone has the same symptoms as the patient, *and*
- the proper methods of disposal of unneeded ER/LA opioid analgesics.

You can re-order or print additional copies of the PCD from www.ER-LA-opioidREMS.com.

Adverse Event Reporting

To report all suspected adverse reactions associated with the use of the ER/LA opioid analgesics, contact:

- the pharmaceutical company that markets the specific product, or
- the FDA MedWatch program:
 - by phone at 1-800-FDA-1088 (1-800-332-1088) or
 - online at www.fda.gov/medwatch/report.htm

More information about this REMS can be obtained at: www.ER-LA-opioidREMS.com or by calling the ER/LA Opioid Analgesic REMS Call Center at 1-800-503-0784.

Sincerely,

The ER/LA Opioid Analgesic Companies

FDA-Required REMS Program for Serious Drug Risks

Subject: Risk Evaluation and Mitigation Strategy (REMS) for all extended-release/long-acting opioid analgesic drug products due to their risks of misuse, abuse, addiction, and overdose

Dear **DEA**-Registered Prescriber:

You are receiving this letter because you recently registered with DEA to prescribe Schedule II or III drugs. The purpose of this letter is to inform you about a Risk Evaluation and Mitigation Strategy (REMS) that has been required by the U.S. Food and Drug Administration (FDA) for all extended-release and long-acting (ER/LA) opioid analgesic drug products.

ER/LA opioid analgesics are used for the management of pain severe enough to require daily, around-the-clock, long-term opioid treatment and for which alternative treatment options are inadequate. Because of the risks of addiction, abuse and misuse with opioids, even at recommended doses, and because of the greater risks of overdose and death with extended-release formulations, reserve ER/LA opioid analgesics for use in patients for whom alternative treatment options (e.g. non-opioid analgesics or immediate-release opioids) are ineffective, not tolerated, or would be otherwise inadequate to provide sufficient management of pain.

They can be safe and effective in appropriately selected patients when used as directed. However, opioid analgesics are also associated with serious risks and are at the center of a major public health crisis of increased misuse, abuse, addiction, overdose, and death.

FDA determined that a REMS was necessary to ensure that the benefits of ER/LA opioid analgesics continue to outweigh their risks of adverse outcomes (addiction, unintentional overdose, and death) resulting from inappropriate prescribing, abuse, and misuse. A REMS is a strategy to manage a known or potential serious risk associated with a drug product. In the interest of public health and to minimize the burden on the healthcare delivery system of having multiple unique REMS programs, the pharmaceutical companies subject to this REMS have joined together to implement the REMS for all ER/LA opioid analgesic drug products.

The ER/LA Opioid Analgesic REMS has three principal components:

- a) Prescriber training on all ER/LA opioid analgesics,
- b) a *Patient Counseling Document on Extended-Release/Long-Acting Opioid Analgesics* (PCD), and
- c) a unique Medication Guide for each ER/LA opioid analgesic drug product.

The branded and generic drug products subject to this REMS include *all*:

- extended-release, oral-dosage forms containing
 - hydrocodone,
 - hydromorphone,
 - morphine,
 - oxycodone,
 - oxymorphone, or
 - tapentadol;
- fentanyl and buprenorphine-containing transdermal delivery systems; *and*
- methadone tablets and solutions as well as buprenorphine-containing buccal films that are indicated for use as analgesics.

Prescriber Action

Under the REMS, you are **strongly encouraged** to do **all** of the following:

- **Train (Educate Yourself)** - Complete REMS-compliant training on the ER/LA opioid analgesics offered by an accredited provider of continuing education (CE) for your discipline. *REMS-compliant training* will: (a) be delivered by accredited CE providers; (b) cover all elements of the FDA Blueprint for Prescriber Education for Extended-Release and Long-Acting Opioid Analgesics ("FDA Blueprint"); (c) include a knowledge assessment; and (d) be subject to independent audit of content and compliance with applicable accrediting standards.
- **Counsel Your Patients** - Discuss the safe use, serious risks, storage, and disposal of ER/LA opioid analgesics with patients and their caregivers every time you prescribe these medicines. Use the enclosed *Patient Counseling Document on Extended-Release/Long-Acting Opioid Analgesics* (PCD) to facilitate these discussions.

Prescriber Letter #3

- **Emphasize Patient and Caregiver Understanding of the Medication Guide** - Stress to patients and their caregivers the importance of reading the Medication Guide that they will receive from their pharmacist every time an ER/LA opioid analgesic is dispensed to them, as information may have changed.
- **Consider Using Other Tools** - In addition to the PCD, there are other publicly available tools to improve patient, household and community safety when using ER/LA opioid analgesics, as well as compliance with conditions of treatment, including Patient-Prescriber Agreements (PPAs) and risk assessment instruments.

REMS-compliant Training Programs

REMS-compliant training is a critical component of the ER/LA Opioid Analgesics REMS program. REMS-compliant training will focus on the safe prescribing of ER/LA opioid analgesics. The FDA developed core messages to be communicated to prescribers in the FDA Blueprint for Prescriber Education for Extended-Release and Long-Acting Opioid Analgesics (“FDA Blueprint”), which is being used by accredited CE providers to develop the REMS-compliant training courses. The Blueprint is available at <http://www.fda.gov/downloads/Drugs/DrugSafety/InformationbyDrugClass/UCM515636.pdf>

REMS-compliant training for prescribers includes both general and product-specific drug information, as well as information on weighing the benefits and risks of opioid therapy, appropriate patient selection, managing and monitoring patients, and counseling patients on the safe use of these drugs. In addition, the education includes information on how to recognize evidence of, and the potential for, opioid misuse, abuse, addiction, and overdose. REMS-compliant training may also be offered by academic institutions or learned societies independent of REMS-related funding. We encourage you to successfully complete REMS-compliant training from an accredited CE provider to improve your ability to prescribe these medications more safely.

For a listing of available REMS-compliant training offered by accredited CE providers under the REMS, visit www.ER-LA-opioidREMS.com.

The Patient Counseling Document on Extended-Release/Long-Acting Opioid Analgesics (PCD)

Enclosed with this letter is the Patient Counseling Document that was developed under the REMS for ER/LA opioid analgesics and designed to assist you in having important conversations with patients for whom you select an ER/LA opioid analgesic. It contains important safety information common to the drug products subject to this REMS, and includes space for you to write additional information to help your patients use their ER/LA opioid analgesic safely. The PCD should be provided to the patient or their caregiver at the time of prescribing. Patients and their caregivers should be counseled on:

- the importance of taking these medicines exactly as you prescribe them,
- the need to store ER/LA opioid analgesics safely and securely – out of the reach of children, pets, and household members– to avoid risks from unintended exposure,
- the importance of not sharing these medications, even if someone has the same symptoms as the patient, *and*
- the proper methods of disposal of unneeded ER/LA opioid analgesics.

You can re-order or print additional copies of the PCD from www.ER-LA-opioidREMS.com.

Adverse Event Reporting

To report all suspected adverse reactions associated with the use of the ER/LA opioid analgesics, contact:

- the pharmaceutical company that markets the specific product, or
- the FDA MedWatch program:
 - by phone at 1-800-FDA-1088 (1-800-332-1088) or
 - online at www.fda.gov/medwatch/report.htm

More information about this REMS can be obtained at: www.ER-LA-opioidREMS.com or by calling the ER/LA Opioid Analgesic REMS Call Center at 1-800-503-0784.

Sincerely,

The ER/LA Opioid Analgesic REMS Companies

FDA-Required REMS Program for Serious Drug Risks

Subject: Announcement of a Risk Evaluation and Mitigation Strategy (REMS) for all extended-release/long-acting opioid analgesic drug products due to their risks of misuse, abuse, addiction, and overdose

Dear <Professional Organization/Licensing Board>:

We encourage you to share the following information with your <members/licensees>.

Extended-release and long-acting (ER/LA) opioid analgesics are approved for the management of chronic moderate-to-severe pain in the U.S., and can be safe and effective in appropriately selected patients when used as directed. However, opioid analgesics are also associated with serious risks and are at the center of a major public health crisis of increased misuse, abuse, addiction, overdose, and death.

The U.S. Food and Drug Administration (FDA) has determined that a Risk Evaluation and Mitigation Strategy (REMS) is necessary for ER/LA opioid analgesics to ensure that the benefits continue to outweigh the risks of adverse outcomes (addiction, unintentional overdose, and death) resulting from inappropriate prescribing, abuse, and misuse. A REMS is a strategy to manage a known or potential serious risk associated with a drug product. In the interest of public health and to minimize the burden on the healthcare delivery system from having multiple unique REMS programs, pharmaceutical companies subject to this REMS have joined together to implement this REMS for all ER/LA opioid analgesic drug products.

The principal components of this REMS are:

- a) Prescriber training on all ER/LA opioid analgesics,
- b) the *Patient Counseling Document on Extended-Release and Long-Acting Opioid Analgesics* (PCD), and
- c) a unique Medication Guide for each ER/LA opioid analgesic drug product.

The branded and generic drug products subject to this REMS include *all*:

- extended-release, oral-dosage forms containing
 - hydromorphone,
 - morphine,
 - oxycodone,
 - oxymorphone, or
 - tapentadol;
- fentanyl and buprenorphine-containing transdermal delivery systems; *and*
- methadone tablets and solutions that are indicated for use as analgesics.

Prescriber Action

Under the REMS, prescribers are **strongly encouraged** to do **all** of the following:

- **Train (Educate Themselves)** - Complete REMS-compliant training offered by an accredited provider of continuing education (CE) for their discipline. This training is being developed and will be offered early next year at no or nominal cost to prescribers. You will be notified when REMS-compliant training will become available. *REMS-compliant training* will: (a) be delivered by accredited CE providers; (b) cover all elements of the FDA Blueprint for Prescriber Education for Extended-Release and Long-Acting Opioid Analgesics ("FDA Blueprint"); (c) include a post-course knowledge assessment; and (d) be subject to independent audit of content and compliance with applicable accrediting standards.
- **Counsel Their Patients** - Discuss the safe use, storage, and disposal of ER/LA opioid analgesics with patients and their caregivers every time they prescribe these medicines. The enclosed *Patient Counseling Document (PCD) on Extended-Release/Long-Acting Opioid Analgesics* should be used to facilitate these discussions.

- **Emphasize Understanding the Medication Guide** - Stress to patients and their caregivers the importance of reading the Medication Guide that they will receive from their pharmacist every time an ER/LA opioid analgesic is dispensed to them, as information in the Medication Guide may have changed.
- **Consider Using other Tools** - In addition to the PCD, there are other publicly-available tools to improve patient, household, and community safety when using ER/LA opioid analgesics, as well as compliance with conditions of treatment, including Patient-Prescriber Agreements (PPAs) and risk assessment instruments.

REMS-compliant Training Programs

A critical component of the ER/LA Opioid Analgesics REMS program is essential safety education for prescribers. REMS-compliant training for prescribers, as described previously, will include both general and product-specific drug information, as well as information on weighing the benefits and risks of opioid therapy, appropriate patient selection, managing and monitoring patients, and counseling patients on the safe use of these drugs. In addition, the education will include information on how to recognize evidence of, and the potential for, opioid misuse, abuse, addiction, and overdose.

It will be some time before the REMS-compliant training funded by educational grants from the pharmaceutical companies subject to this REMS becomes available. The FDA developed core messages to be communicated to prescribers in the [FDA Blueprint for Prescriber Education for Extended-Release and Long-Acting Opioid Analgesics \("FDA Blueprint"\)](#), which will be used by accredited CE providers to develop REMS-compliant training courses. A follow-up letter notifying you of the availability of REMS-compliant training funded under this REMS will be sent not later than thirty (30) days before such training is offered. However, REMS-compliant education may also be offered by academic institutions or professional societies independent of REMS-related funding. We encourage you to successfully complete REMS-compliant training offered to improve your ability to prescribe these medications more safely.

The Patient Counseling Document on Extended-Release/Long-Acting Opioid Analgesics (PCD)

Enclosed with this letter is the Patient Counseling Document that was developed under the REMS for ER/LA opioid analgesics to assist you in having important conversations with patients for whom you select an ER/LA opioid analgesic. It contains important safety information common to the drug products subject to this REMS, and includes space for you to write additional information to help your patients use their specific ER/LA opioid analgesic safely. The PCD should be provided to the patient or their caregiver at the time of prescribing. Patients and their caregivers should be counseled on:

- the importance of taking these medicines exactly as you prescribe them,
- the need to store ER/LA opioid analgesics safely and securely – out of the reach of children, pets, and household members – to avoid risks from unintended exposure/ingestion,
- the importance of not sharing these medications, even if someone has the same symptoms as the patient, *and*
- the proper methods of disposal of unneeded ER/LA opioid analgesics.

Prescribers can re-order or print additional copies of the PCD from www.ER-LA-opioidREMS.com.

Adverse Event Reporting

To report all suspected adverse reactions associated with the use of the ER/LA opioid analgesics, contact:

- the pharmaceutical company that markets the specific product, or
- the FDA MedWatch program:
 - by phone at 1-800-FDA-1088 (1-800-332-1088) or
 - online at www.fda.gov/medwatch/report.htm

More information about this REMS can be obtained at: www.ER-LA-opioidREMS.com or by calling the ER/LA Opioid Analgesic REMS Call Center at 1-800-503-0784.

Sincerely,

The ER/LA Opioid Analgesic REMS Companies

FDA-Required REMS Program for Serious Drug Risks

Subject: Availability of Risk Evaluation and Mitigation (REMS)-compliant training under the REMS for all extended-release/long-acting opioid analgesic drug products.

Dear <Professional Organization/Licensing Board>:

Extended-release and long-acting (ER/LA) opioid analgesics¹ are approved for the management of chronic moderate-to-severe pain in the U.S., and can be safe and effective in appropriately selected patients when used as directed. However, opioid analgesics are also associated with serious risks and are at the center of a major public health crisis of increased misuse, abuse, addiction, overdose, and death. The U.S. Food and Drug Administration (FDA) determined that a Risk Evaluation and Mitigation Strategy (REMS) was necessary to ensure that the benefits of ER/LA opioid analgesics continue to outweigh the risks of adverse outcomes (addiction, unintentional overdose, and death) resulting from inappropriate prescribing, abuse, and misuse.

Several months ago, you received a letter announcing the REMS for all ER/LA opioid analgesic drug products, which explained that the principal components of this REMS are:

- a) Prescriber training on all ER/LA opioid analgesics,
- b) the *Patient Counseling Document on Extended-Release/Long-Acting Opioid Analgesics* (PCD), and
- c) a unique Medication Guide for each ER/LA opioid analgesic drug product.

REMS-compliant Training Programs

The purpose of this letter is to provide notification of the upcoming availability of REMS-compliant training on ER/LA opioid analgesics – provided at a nominal to no cost to prescribers. REMS-compliant training is a critical component of the ER/LA Opioid Analgesics REMS program and constitutes essential safety education for prescribers. *REMS-compliant training* will: (a) be delivered by accredited CE providers; (b) cover all elements of the FDA Blueprint for Prescriber Education for Extended-Release and Long-Acting Opioid Analgesics (“FDA Blueprint”); (c) include a post-course knowledge assessment; and (d) be subject to independent audit of content and compliance with applicable accrediting standards.

REMS-compliant training will focus on the safe prescribing of ER/LA opioid analgesics. The FDA developed core messages to be communicated to prescribers in the FDA Blueprint, which will be used by accredited CE providers to design and deliver REMS-compliant training courses. The FDA Blueprint is available at <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM163919.pdf>

The core messages include:

- Understand how to assess patients and determine which may be appropriate for treatment with ER/LA opioid analgesics.
- Be familiar with how to initiate therapy, modify dose, and discontinue use of ER/LA opioid analgesics.
- Be knowledgeable about how to manage and monitor ongoing therapy with ER/LA opioid analgesics.
- Know how to counsel patients and caregivers about the safe use of ER/LA opioid analgesics, including proper storage and disposal.
- Be familiar with general and product-specific drug information concerning ER/LA opioid analgesics.

¹ **The branded and generic drug products subject to this REMS include all:** a) extended-release, oral-dosage forms containing: hydrocodone, hydromorphone, morphine, oxycodone, oxymorphone, or tapentadol; b) fentanyl and buprenorphine-containing transdermal delivery systems; and c) methadone tablets and solutions that are indicated for use as analgesics.

REMS-compliant training for prescribers also includes information on weighing the benefits and risks of opioid therapy and how to recognize evidence of, and the potential for, opioid misuse, abuse, addiction, and overdose. REMS-compliant training may also be offered by academic institutions or learned societies independent of REMS-related funding. We encourage you to successfully complete REMS-compliant training from an accredited CE provider to improve your ability to prescribe these medications more safely.

Requested Action

We ask you to encourage your <members/licensees> to successfully complete REMS-compliant training to improve their ability to prescribe these medications more safely. Under the REMS, prescribers are **strongly encouraged** to do **all** of the following:

- **Train (Educate Themselves)** - Complete REMS-compliant training offered by an accredited provider of continuing education (CE) for their discipline.
- **Counsel Their Patients** - Discuss the safe use, serious risks, storage, and disposal of ER/LA opioid analgesics with patients and their caregivers every time you prescribe these medicines. Use the enclosed *Patient Counseling Document on Extended-Release/Long-Acting Opioid Analgesics* (PCD) to facilitate these discussions. Prescribers can re-order or print additional copies of the PCD from www.ER-LA-opioidREMS.com.
- **Emphasize Patient and Caregiver Understanding of the Medication Guide** - Stress to patients and their caregivers the importance of reading the Medication Guide that they will receive from their pharmacist every time an ER/LA opioid analgesic is dispensed to them, as information may have changed.
- **Consider Using Other Tools** - In addition to the PCD, there are other publicly-available tools to improve patient, household, and community safety when using ER/LA opioids, as well as compliance with conditions of treatment, including Patient-Prescriber Agreements (PPAs) and risk assessment instruments.

A listing of REMS-compliant training funded under this REMS appears on www.ER-LA-opioidREMS.com.

Adverse Event Reporting

To report all suspected adverse reactions associated with the use of the ER/LA opioid analgesics, contact:

- the pharmaceutical company that markets the specific product, or
- the FDA MedWatch program:
 - by phone at 1-800-FDA-1088 (1-800-332-1088) or
 - online at www.fda.gov/medwatch/report.htm

More information about this REMS can be obtained at: www.ER-LA-opioidREMS.com or by calling the ER/LA Opioid Analgesic REMS Call Center at 1-800-503-0784.

Sincerely,

The ER/LA Opioid Analgesic Companies

ER/LA Opioid Analgesics REMS

The Extended-Release and Long-Acting Opioid Analgesics Risk Evaluation and Mitigation Strategy

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Looking for Accredited REMS CME/CE? Click Here.

RISK EVALUATION AND MITIGATION STRATEGY (REMS)

A Risk Evaluation and Mitigation Strategy (REMS) is a strategy to manage known or potential serious risks associated with a drug product and is required by the Food and Drug Administration (FDA) to ensure that the benefits of a drug outweigh its risks.

The FDA has required a REMS for extended-release and long-acting (ER/LA) opioid analgesics.

Under the conditions specified in this REMS, **prescribers of ER/LA opioid analgesics are strongly encouraged to do all of the following:**

- **Train (Educate Yourself)** - Complete a [REMS-compliant education program](#) offered by an accredited provider of continuing education (CE) for your discipline
- **Counsel Your Patients** - Discuss the safe use, serious risks, storage, and disposal of ER/LA opioid analgesics with patients and/or their caregivers every time you prescribe these medicines. Click here for the [Patient Counseling Document \(PCD\)](#)
- **Emphasize Patient and Caregiver Understanding of the Medication Guide** - Stress to patients and their caregivers the importance of reading the Medication Guide that they will receive from their pharmacist every time an ER/LA opioid is dispensed to them
- **Consider Using Other Tools** - In addition to the PCD, there are other publicly available tools to improve patient, household and community safety, as well as compliance with conditions of treatment, including Patient-Prescriber Agreement (PPA) and risk assessment instruments



[Click here for a complete list of products covered under the ER/LA Opioid Analgesics REMS Program](#)

For additional information about the ER/LA Opioid REMS Program, call 800-503-0784.

Accredited Continuing Education for Healthcare Professionals

[REMS-Compliant CE for ER/LA Opioid Analgesics](#)

[Listing of Accredited CME/CE REMS-Compliant Activities Supported by RPC](#) ^{UPDATED}

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Looking for Accredited REMS CME/CE? Click Here.

REMS-Compliant CE for ER/LA Opioid Analgesics

Health care professionals who prescribe ER/LA opioid analgesics have a responsibility to help ensure the safe and effective use of ER/LA opioid analgesics. REMS-compliant training programs will focus on the safe prescribing of ER/LA opioid analgesics.

REMS-compliant training will: (a) be delivered by accredited CE providers; (b) cover all elements of the FDA Blueprint for Prescriber Education for Extended-Release and Long-Acting Opioid Analgesics ("FDA Blueprint"); (c) include a knowledge assessment; and (d) be subject to independent audit of content and compliance with applicable accrediting standards.

The FDA has developed core messages to be communicated to prescribers in the [FDA Blueprint for Prescriber Education for Extended-Release and Long-Acting Opioid Analgesics \("FDA Blueprint"\)](#), which will be used by Continuing Education (CE) providers to develop the REMS-compliant training programs.

These core messages include:

- Understand how to assess patients for treatment with ER/LA opioid analgesics.
- Be familiar with how to initiate therapy, modify dose, and discontinue use of ER/LA opioid analgesics.
- Be knowledgeable about how to manage ongoing therapy with ER/LA opioid analgesics.
- Know how to counsel patients and caregivers about the safe use of ER/LA opioid analgesics, including proper storage and disposal.
- Be familiar with general and product-specific drug information concerning ER/LA opioid analgesics.

The first prescriber REMS-compliant training programs are anticipated to be available by March 1, 2013.

[Click here for a listing of available REMS-compliant training activities supported by educational grants from the ER/LA opioid analgesics companies and offered by accredited CE providers.](#)

Links

[Listing of Accredited CME/CE REMS-Compliant Activities Supported by RPC](#) ^{UPDATED}

[FDA Blueprint for Prescriber Education for Extended-Release and Long-Acting Opioid Analgesics \("FDA Blueprint"\)](#)

[If you are a CE provider, click here for more information](#)

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Patient Counseling Document

What is the Patient Counseling Document?

The Patient Counseling Document (PCD) on Extended-Release/Long Acting (ER/LA) Opioid Analgesics is a tool unique to this REMS designed to facilitate important discussions with your patients for whom you select an ER/LA opioid analgesic. The PCD should be provided to and reviewed with the patient and/or their caregiver at the time of prescribing. It contains important safety information about the drug products subject to this REMS and includes space for you to write additional information to help your patients use their ER/LA opioid analgesic safely.

How can I obtain copies of the PCD?

Printed copies of the PCD can be ordered either through an on-line order or via fax. Detailed instructions for both methods of ordering printed copies of the PCD can be found in the PCD Order Form, and an electronic version of the Patient Counseling Document (PCD) is also available for download.

Materials for Download

[Patient Counseling Document \(PCD\) - English](#)

[Patient Counseling Document \(PCD\) - Spanish](#)

[PCD Order Form](#)

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Dear DEA-Registered Prescriber Letter

Click on the letter title below to open a PDF version of that letter.

- [Dear DEA-Registered Prescriber Letter 3 - Announcing REMS approval and REMS-related CME/CE opportunities to newly DEA-registered Schedule II and III Prescribers](#)

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Products covered under the ER/LA Opioid Analgesics REMS Program

Brand Name Products

Trade Name	Generic Name	Company	Contact	Links

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Generic Name Products

Trade Name	Generic Name	Company	Contact	Links

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The RPC attests that the table above will only include products listed in the link titled 'List of approved application numbers and sponsors' on the FDA Approved REMS website.

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Selected Important Safety Information

ABUSE POTENTIAL AND RISK OF LIFE-THREATENING RESPIRATORY DEPRESSION

The branded and generic drug products subject to this REMS include *all*:

- extended-release, oral dosage forms containing
 - hydrocodone,
 - hydromorphone,
 - morphine,
 - oxycodone,
 - oxymorphone, or
 - tapentadol;
- fentanyl and buprenorphine-containing transdermal delivery systems; *and*
- methadone tablets and solutions as well as buprenorphine-containing buccal films that are indicated for use as analgesics.

These drug products will be collectively referred to as Extended-Release and Long-Acting (ER/LA) prescription opioid analgesics.

ER/LA prescription opioid analgesics are opioid agonists and Schedule II or, Schedule III, as is the case with transdermal and buccal film buprenorphines, controlled substances with abuse liabilities similar to other opioid agonists. Schedule II and Schedule III opioid substances have high potential for abuse and risk of fatal overdose due to respiratory depression.

ER/LA opioid analgesics can be abused in a manner similar to other opioid agonists, legal or illicit. This should be considered when prescribing or dispensing ER/LA opioid analgesics in situations where the physician or pharmacist is concerned about an increased risk of misuse, abuse, or diversion.

Persons at increased risk for opioid abuse include those with a personal or family history of substance abuse (including drug or alcohol abuse or addiction) or mental illness (e.g., major depression). Patients should be assessed for their clinical risks for opioid abuse or addiction prior to being prescribed opioids. All patients receiving opioids should be routinely monitored for signs of misuse, abuse and addiction.

ER/LA opioid analgesics containing buprenorphine, fentanyl, hydrocodone, hydromorphone, methadone, morphine, oxycodone, oxymorphone, and tapentadol are indicated for the management of pain severe enough to require daily, around-the-clock, long-term opioid treatment and for which alternative treatment options are inadequate. Extended-release oxycodone (OxyContin) is also indicated in pediatric patients 11 years of age and older who are already receiving and tolerate a minimum daily opioid dose of at least 20 mg oxycodone orally or its equivalent. **ER/LA opioid analgesics are not indicated for acute pain.**

Because of the risks of addiction, abuse and misuse with opioids, even at recommended doses, and because of the greater risks of overdose and death with extended-release formulations, reserve ER/LA opioid analgesics reserved for use in patients for whom alternative treatment options (e.g. non-opioid analgesics or immediate-release opioids) are ineffective, not tolerated, or would be otherwise be inadequate to provide sufficient management of pain. For some of the ER/LA opioid analgesics, certain strengths, certain daily doses, and in specific indicated patient populations (e.g., pediatric patients) are for use in opioid-tolerant patients only. Consult the individual Full Prescribing Information for the definition of opioid tolerance and dosing instructions for patients. ER/LA opioid analgesics are not intended for acute pain, pain that is mild or not expected to persist for an extended period of time, or for use on an as-needed basis.

ER/LA opioid analgesic formulations have product specific dosage and administration instructions. Refer to the individual Full Prescribing Information for specific doses and dosing recommendations.

ER/LA oral dosage forms must be swallowed whole and must not be cut, broken, chewed, crushed, or dissolved. Taking cut, broken, chewed, crushed or dissolved oral dosage forms leads to rapid release and absorption of a potentially fatal dose of the opioid agonist. For patients who have difficulty swallowing their medication whole, certain oral products may be opened and sprinkled on applesauce—refer to the product-specific Full Prescribing Information.

Transdermal dosage forms must not be cut, damaged, chewed, swallowed or used in ways other than indicated since this may cause choking or overdose resulting in death. Avoid direct external heat sources to transdermal application site and surrounding area.

As stated in the **Boxed Warning**, prescribers need to be aware of the following:

- **ER/LA Opioid Analgesics exposes users to risks of addictions, abuse and misuse, which can lead to overdose and death. Assess each patient’s risk before prescribing and monitor regularly for development of these behaviors and conditions.**
- **Serious life-threatening or fatal respiratory depression may occur. Monitor closely, especially upon initiation or following a dose increase. Instruct patients to swallow ER/LA Opioid Analgesics tablets whole to avoid exposure/ingestion to a potentially fatal dose.**
- **Accidental ingestion of ER/LA Opioid Analgesics, especially in children, can result in fatal overdose.**
- **Prolonged use of ER/LA Opioid Analgesics during pregnancy can result in neonatal opioid withdrawal syndrome, which may be life-threatening if not recognized and treated. If opioid use is required for a prolonged period in a pregnant woman, advise the patient of the risk of neonatal opioid withdrawal syndrome and ensure that appropriate treatment will be available.**
- **Initiation of CYP 3A4 inhibitors (or discontinuation of CYP 3A4 inducers) can result in a fatal overdose.**

ER/LA opioid analgesics are contraindicated in patients with a known hypersensitivity to any of the components of ER/LA opioid analgesics, including the respective active ingredients, or in any situation where opioids are contraindicated; in patients who have significant respiratory depression; in patients who have acute or severe bronchial asthma; or in patients who have or are suspected of having paralytic ileus. **These contraindications are not all-inclusive of those for each individual ER/LA opioid analgesic;** therefore, the Full Prescribing Information for the individual ER/LA opioid analgesics must be consulted.

The concomitant use of ER/LA opioid analgesics containing buprenorphine, fentanyl, methadone, or oxycodone with cytochrome P450 3A4 inhibitors may result in increased opioid plasma concentrations and may cause potentially fatal respiratory depression.

Adverse Reactions

Serious adverse reactions of ER/LA opioid analgesics include life threatening respiratory depression, apnea, respiratory arrest, circulatory depression, hypotension, and death.

Accidental exposure/ingestion of ER/LA opioids, especially in children, can result in death.

With methadone, cases of QT interval prolongation and serious arrhythmia (torsades de pointes) have been observed during treatment. Most cases involve patients being treated for pain with large, multiple daily doses of methadone, although cases have been reported in patients receiving doses commonly used for maintenance treatment of opioid addiction. A positive-controlled study of the effects of transdermal buprenorphine on the QTc interval in healthy subjects demonstrated no clinically meaningful effect at a transdermal buprenorphine dose of 10 mcg/hour; however, a transdermal buprenorphine dose of 40 mcg/hour (given as two 20 mcg/hour transdermal buprenorphine systems) was observed to prolong the QTc interval.

The most common adverse reactions of ER/LA opioid analgesics include constipation, nausea, somnolence, dizziness, vomiting, pruritus, headache, dry mouth, asthenia, and sweating. Additionally, the following have been reported with transdermal buprenorphine and fentanyl products: application site pruritus, application site erythema, and application site rash. Refer to the individual Full Prescribing Information for all product-specific adverse reactions.

Adverse Event Reporting

Please report all suspected adverse reactions associated with the use of the specific ER/LA opioid analgesic to the appropriate company. You may also report adverse events directly to the FDA's MedWatch Reporting System:

- by calling 1-800-FDA-1088 (1-800-332-1088),
- online at <https://www.accessdata.fda.gov/scripts/medwatch/medwatch-online.htm> *or*
- by mail using the fillable portable document format (PDF) Form FDA 3500, available at <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM163919.pdf>

Patient Counseling Document and Medication Guide

The Patient Counseling Document (PCD) on Extended-Release/Long-Acting Opioids is a tool unique to this REMS designed to facilitate important discussions with your patients and their caregivers for whom you select an ER/LA opioid analgesic. The PCD should be provided to the patient and/or their caregiver at the time of prescribing. It contains important safety information about the drug products subject to this REMS and includes space for you to write additional information to help your patients use their ER/LA opioid analgesic safely.

Patients and their caregivers should be counseled on: the importance of taking these medicines exactly as you prescribe them, the need to store ER/LA opioid analgesics safely and securely—out of the reach of children, pets, and household acquaintances to avoid risks from unintended exposure, the importance of not sharing these medications, even if someone has the same symptoms as the patient, and the proper methods of disposal of unneeded ER/LA opioid analgesics.

It is important that you encourage your patients and their caregivers to read the relevant Medication Guide when they pick up their prescription from the pharmacy. The Medication Guide provides important information on the safe and effective use of the specific ER/LA opioid analgesic prescribed.

ER/LA Opioid Analgesics REMS

The Extended-Release and Long-Acting Opioid Analgesics Risk Evaluation and Mitigation Strategy

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Safety Labeling Change Popup

IMPORTANT SAFETY LABEL CHANGES!

Revised Indication:

- For the management of pain severe enough to require daily, around-the-clock, long-term opioid treatment and for which alternative treatment options are inadequate.

Revised Warnings:

- ADDICTION, ABUSE and MISUSE
- LIFE-THREATENING RESPIRATORY DEPRESSION
- ACCIDENTAL INGESTION
- CYTOCHROME P450 3A4 INTERACTION.

New Warning:

- NEONATAL OPIOID WITHDRAWAL SYNDROME

Please click on the [U.S. Prescribing Information](#) link for the complete label for each ER/LA opioid drug.

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/s/

KIMBERLY LEHRFELD
09/27/2016

CYNTHIA L LACIVITA
09/27/2016
Concur