BTOD|REMS

IMPORTANT DRUG SAFETY INFORMATION

Subject: Risk Evaluation and Mitigation Strategy (REMS) for buprenorphine-containing transmucosal products for opioid dependence (BTODs) due to their risks of accidental overdose, misuse, and abuse.

Dear Prescriber:

You are receiving this letter because you are a prescriber of a product covered under the BTOD REMS.

The purpose of this letter is to inform you about the requirements of the BTOD REMS. This REMS does not apply to buprenorphine-containing products that are dispensed to patients in an Opioid Treatment Program (OTP) under 42 CFR Part 8.

The FDA has determined that a REMS is necessary to ensure that the benefits of BTODs outweigh the potential risks of accidental overdose, misuse, and abuse. **Buprenorphine is an opioid and, like other opioids, has the potential for being abused and misused**. Abuse of buprenorphine poses a risk of overdose and death. This risk is increased with the concomitant use of buprenorphine and alcohol and other central nervous system (CNS) depressants, especially benzodiazepines. BTODs that contain only buprenorphine are indicated for the treatment of opioid dependence and are preferred for induction. BTODs that contain buprenorphine with naloxone are indicated for the maintenance treatment of opioid dependence and may be appropriate for induction in patients physically dependent on heroin and other short-acting opioids. These products should be used as part of a complete treatment plan that includes counseling and psychosocial support.[1]

Prescriber Action

To meet the requirements of the REMS and to ensure the benefits of prescribing BTODs outweigh the risks of accidental overdose, misuse, and abuse, prescribers should take the following measures and document actions taken with each patient to ensure safe use conditions:

- Verify the patient meets appropriate diagnostic criteria for opioid dependence.
- Check the patient's prescription profile in the Prescription Drug Monitoring Program, as appropriate, and review all medications (e.g., benzodiazepines, other opioids, CNS depressants) and illicit substances to assess for appropriateness of co-prescribing.
- **Discuss the risks** (including misuse and abuse) **and side effects** associated with BTODs, including those described in the Medication Guide.
- Explain what patients should do if they experience side effects.
- Explain how to store BTODs safely out of the sight and reach of all others, especially children.
- Discuss the importance of having access to naloxone with the patient and caregiver, if there are household members (including children) or other close contacts at risk for accidental ingestion or opioid overdose.
- If the patient will have naloxone, also advise patients and caregivers:
  - How to treat with naloxone in the event of an opioid overdose
  - To tell family and friends about their naloxone and to keep it in a place where family and friends can easily access it in an emergency
  - To read the Patient Information (or other educational material) that will come with their naloxone. Emphasize the importance of doing this before an opioid emergency happens, so the patient and caregiver will know what to do.
- Provide induction doses under appropriate supervision.
- Prescribe a limited amount of medication that will last until the patient's next medical appointment.
- Schedule patient appointments commensurate with patient stability (weekly or more frequent medical appointments recommended for the first month).
- Consider "pill/film count"/dose reconciliation.
- Assess whether the patient is receiving counseling/psychosocial support **and, if not, encourage them to do so**.
- Assess whether the patient is making progress toward treatment goals (including, as appropriate, urine toxicology testing).
- Continually assess the appropriateness of the maintenance dose.
- Continually assess whether or not the benefits of treatment outweigh the risks.

[1] Counseling and other services are important as part of a comprehensive treatment plan, but the provision of medication should not be made contingent upon participation in such services.

Serious Risks of BTODs

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

- **Instruct patients to keep BTODs in a secure place, out of the sight and reach of all others, especially children. Accidental or deliberate ingestion by a child may cause respiratory depression that can result in death. Advise patients to seek medical attention immediately if a child is exposed to one of these products.**
- Warn patients that it is extremely dangerous to self-administer non-prescribed benzodiazepines or other CNS depressants (including alcohol) with these products. Caution patients prescribed benzodiazepines or other CNS depressants to use them only as directed by their prescriber.
- Advise patients to never give BTODs to anyone else, even if they have the same signs and symptoms. BTODs may cause harm or death.
- Discuss the availability of naloxone for the emergency treatment of opioid overdose for the patient, household members (including children), or other close contacts at risk for accidental ingestion or opioid overdose.
- Advise patients that BTODs contain an opioid and, like other opioids, can be abused and misused by others. Caution patients to keep BTODs in a secure and safe place, out of the sight and reach of all others, especially children, and to protect them from theft.
- Advise patients that selling or giving away BTODs is against the law.
- **Use the contents of each BTOD's Medication Guide**, in its entirety, with each patient to review the information noted above, including side effects and what to do if a patient has them. The Medication Guide will be dispensed with each prescription for a BTOD.
- **Encourage patients to seek psychosocial counseling and support for safe and effective treatment.**

Patient Monitoring and Appropriate Dosing Info

The ***Appropriate Use Checklist*** is enclosed to assist you in performing and documenting the above prescriber actions of the BTOD REMS. Use the enclosed checklist or other means (e.g. electronic health record) specific to your office practice to document that the above actions have been completed for each patient.

Reporting Adverse Events

To report SUSPECTED ADVERSE EVENTS contact:

- The manufacturer of the product taken or
- FDA MedWatch program by phone at 1-800-FDA-1088 or online at www.fda.gov/medwatch/report.htm

This letter is not a comprehensive description of the risks associated with the use of BTODs. Additional important safety information can be found in the ***Important Drug Safety Information for Prescribers*** educational brochure and Prescribing Information.

Additional copies of the educational brochure, ***Appropriate Use Checklist***, Prescribing Information, and Medication Guide for each product covered under the BTOD REMS, can be obtained at https://www.btodrems.com/ or by contacting the toll-free call center at 1-855-223-3922.

Sincerely,

The BTOD Companies

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Enclosures: ***Appropriate Use Checklist***
Important Drug Safety Information for Prescribers