



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.

<DATE>

Dear Pharmacist:

The purpose of this letter is to inform you of a REMS called 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.

A REMS has been implemented as part of the FDA requirements to ensure that the benefits of treatment with BTODs outweigh the potential risks. **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

Medication Guide

As part of the REMS, pharmacists dispensing BTODs for opioid dependence must supply the Medication Guide with each prescription. The Medication Guide will be provided with the product and is also available by going online to <https://www.btodrems.com> or calling 1-855-223-3922.

Pharmacist Action

As a pharmacist, you will play an important role in ensuring that BTODs are used safely and appropriately. Each time you fill a prescription for a BTOD, make sure to:

- Explain how to store BTODs safely **out of the sight and reach of all others, especially children.**
- Discuss having naloxone available for the emergency treatment of opioid overdose with the patient and caregiver. Inform patients and caregivers of their options for obtaining naloxone.
- If the patient will have naloxone, also advise patients and caregivers:
 - o How to treat with naloxone in the event of an opioid overdose
 - o 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
 - o 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.
- 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) to assess for appropriateness of co-prescribing.
- Keep in mind that a limited supply of BTODs should be dispensed during the initiation of therapy. This is due to the need of prescribers to closely and frequently assess the patient's needs, their symptoms, and potential risk of misuse, diversion, and abuse.
- **Provide the Medication Guide to patients** each time the medicine is dispensed and discuss the risks and side effects associated with BTODs, including what to do if patients experience side effects.
- Remind patients who are picking up induction doses to follow-up as directed with the prescriber's office.
- Provide appropriate patient counseling on safe use of BTODs and **encourage patients to seek psychosocial counseling and support for safe and effective treatment.**
- Be vigilant in detecting fraudulent prescriptions or simultaneous prescriptions for the same patient from multiple prescribers.

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 misused and abused 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.**

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 Pharmacists*** educational brochure and Prescribing Information.

Additional copies of the educational brochure, 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

Version 7.0 Revised March 2024

Enclosures: ***Important Drug Safety Information for Pharmacists***