



IMPORTANT SAFETY INFORMATION

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

<DATE>

Dear Pharmacist:

The purpose of this letter is to inform you of a Risk Evaluation and Mitigation Strategy (REMS) called the Buprenorphine-containing Transmucosal products for Opioid Dependence (BTOD) REMS program. 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 buprenorphine-containing products outweigh the potential risks. Buprenorphine, like morphine and other opioids, has the potential for being abused and misused. Abuse of buprenorphine poses a risk of overdose and death. This risk is increased with the concomitant use of buprenorphine and alcohol and other central nervous system (CNS) depressants, especially benzodiazepines. Products containing buprenorphine only are indicated for the treatment of opioid dependence and are preferred for induction. Products containing 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.

Medication Guide

As part of the REMS, pharmacists dispensing buprenorphine-containing products for opioid dependence must supply a Medication Guide for the buprenorphine-containing product 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 buprenorphine-containing products are used safely and appropriately. Each time you fill a prescription for a buprenorphine-containing product, make sure to:

- Verify that the prescription you receive is from a prescriber who is in compliance with the provisions of DATA 2000.
- Explain how to store buprenorphine-containing products 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 as permitted by individual state naloxone dispensing and prescribing requirements or guidelines (e.g., by prescription, directly from a pharmacist, or as part of a community-based program).
- If naloxone is prescribed, 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.
- Check 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 buprenorphine-containing products should be dispensed during the initiation of therapy. This is due to the need of prescribers to closely and frequently assess the patients' 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 buprenorphine products, including what to do if patients experience side effects.
- Remind patients who are picking up induction doses to return as directed to the prescriber's office so that they can be supervised while taking the medication.
- Provide appropriate patient counseling on safe use of buprenorphine-containing products 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.

Serious Risks of Buprenorphine-containing Products

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

- **Instruct patients to keep buprenorphine-containing products in a secure place, out of the sight and reach of all others, especially children. Accidental or deliberate ingestion by a child may cause respiratory depression that can result in death. 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 buprenorphine-containing products to anyone else, even if he or she has the same signs and symptoms. They 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 buprenorphine-containing products contain an opioid that can be a target for people who abuse prescription medications or street drugs. Caution patients to keep buprenorphine-containing products 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 these products is against the law.
- **Use the contents of each BTOD drug product's Medication Guide**, in its entirety, with each patient to review the information noted above including side effects and what to do if a patient has them. The Medication Guide will be dispensed with each prescription for a buprenorphine-containing transmucosal product.
- **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 buprenorphine-containing transmucosal products. Additional important safety information can be found in the **Office-Based Buprenorphine Therapy for Opioid Dependence: Important 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 Buprenorphine-containing Transmucosal products for Opioid Dependence Companies

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Enclosures: Office-Based Buprenorphine Therapy for Opioid Dependence: Important Information for Pharmacists