CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

203441Orig1s000

REMS

Initial REMS Approved: 12/21/2012

NDA 203441 GATTEX®
(Teduglutide [rDNA origin]) for Injection

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RISK EVALUATION AND MITIGATION STRATEGY (REMS)

I. GOAL

To inform prescribers and patients about the risks of possible acceleration of neoplastic growth and enhancement of colon polyp growth, gastrointestinal obstruction, and biliary and pancreatic disorders associated with GATTEX.

II. REMS ELEMENTS

A. Communication Plan

NPS will implement a communication plan to support implementation of the REMS. The communication plan materials will comprise:

1. **A Dear Healthcare Professional letter** to gastroenterologists, colorectal and gastrointestinal tract surgeons. In order to facilitate prescriber training and education, this initial letter will be distributed within 60 days of approval of GATTEX or at the time of product launch, whichever is sooner. The letter will be sent again at 12 and 24 months after product approval. NPS will also identify and send the DHCP letter to all other GATTEX prescribers within 60 days of the date of initial prescription, and again at 12 and 24 months after their initial prescription. This letter will be distributed via direct mail or electronic delivery and will be accessible via the GATTEX REMS website (www.GATTEXREMS.com). A copy of the Full Prescribing Information and a Medication Guide will be included in the Dear Healthcare Professional letter.

2. **A Dear Professional Society letter** to the leadership of the professional organizations listed below requesting that the letter be provided to the members of these professional organizations. The Dear Professional Society letter will be disseminated via direct mail or electronic delivery within 60 days of approval of GATTEX or at the time of

product launch, whichever is sooner. The letter will be sent again at 12 and 24 months after product approval. A copy of the Full Prescribing Information and a Medication Guide will be included in the Dear Professional Society letter.

i. American Society for Parenteral and Enteral Nutrition
ii. American Gastroenterological Association
iii. American College of Gastroenterology
iv. Society for Surgery of the Alimentary Tract
v. American Society of Colon and Rectal Surgery
vi. American Board of Physician Nutrition Specialists (ABPNS)

The Dear Healthcare Professional letter and the Dear Professional Society letter are part of the REMS and are appended.

The Dear Healthcare Professional letter and the Dear Professional Society letter will be provided to MedWatch at the same time they are provided to the healthcare professionals and the professional society leadership.

B. Elements To Assure Safe Use

1. Healthcare providers who prescribe GATTEX will receive training.

   a. NPS Pharmaceuticals will ensure that training is made available to healthcare providers who prescribe GATTEX. Training will consist of the Prescriber Education Slide Deck.

   b. Each prescriber will be provided with the **Prescriber Education Slide Deck** which will include the following information:

      i. The risks of possible acceleration of neoplastic growth and enhancement of colon polyp growth associated with GATTEX.

      ii. The serious risk of gastrointestinal obstruction associated with GATTEX.

      iii. The serious risk of biliary and pancreatic disorders associated with GATTEX.

      iv. The recommended screening colonoscopy, follow-up colonoscopy, and monitoring laboratory tests

   c. NPS will ensure that the Prescriber Education Slide Deck will be available in hard copy and on the GATTEX REMS website.

   NPS will ensure that prescribers can report that they have completed the Prescriber Education Slide Deck.

   d. NPS will maintain a list of healthcare providers (HCPs) who have completed the Prescriber Education Slide Deck.

e. In order to facilitate patient and/or caregiver education about GATTEX, NPS will ensure that the **Patient and Caregiver Counseling Guide** will be available for prescribers to use to counsel patients considering GATTEX therapy about the possible acceleration of neoplastic growth and enhancement of colon polyp growth, gastrointestinal obstruction, and biliary and pancreatic disorders associated with GATTEX, as well as the recommended screening colonoscopy, follow-up colonoscopy and monitoring laboratory tests.

f. NPS will ensure that all educational materials listed in or appended to the GATTEX REMS will be available through the GATTEX REMS website, www.GATTEXREMS.com.

g. The following materials are part of the GATTEX REMS and are appended:

- *Prescriber Education Slide Deck*
- *Patient and Caregiver Counseling Guide*
- *GATTEX REMS Website Screenshots*

These materials will also be available by calling NPS Pharmaceuticals at 1-855-5GATTEX or 1-855-542-8839.

C. Timetable for Submission of Assessments

NPS will submit REMS assessments to FDA at 12 months from the date of initial approval of the REMS 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 should conclude no earlier than 60 days before the submission date for that assessment. NPS will submit each assessment so that it is received by the FDA on or before the due date.

[Date]

IMPORTANT DRUG WARNING

Subject: Risk of possible acceleration of neoplastic growth and enhancement of colon polyp growth, GI obstruction, and biliary and pancreatic disorders with GATTEX® (teduglutide)

Dear Healthcare Professional:

The purpose of this letter is to inform you that GATTEX® (Teduglutide [rDNA origin]) for Injection has been approved by the U.S. Food and Drug Administration (FDA) for the treatment of adult patients with Short Bowel Syndrome (SBS) who are dependent on parenteral support.

The FDA has determined that a Risk Evaluation and Mitigation Strategy (REMS) is necessary to ensure that the benefits of GATTEX outweigh the potential risks.

Serious Risks of GATTEX

Possible acceleration of neoplastic growth and enhancement of colon polyp growth

- *Acceleration of Neoplastic Growth*

Based on the pharmacologic activity and findings in animals, GATTEX has the potential to cause hyperplastic changes including neoplasia. In patients at increased risk for malignancy, the clinical decision to use GATTEX should be considered only if the benefits outweigh the risks. In patients with active gastrointestinal malignancy (GI tract, hepatobiliary, pancreatic), GATTEX therapy should be discontinued. In patients with active non-gastrointestinal malignancy, the clinical decision to continue GATTEX should be made based on risk-benefit considerations.

- *Colorectal Polyps*

Colorectal polyps were identified during the clinical trials. Colonoscopy of the entire colon with removal of polyps must be done within 6 months prior to starting treatment with GATTEX. A follow-up colonoscopy (or alternate imaging) is recommended at the end of 1 year of GATTEX. Subsequent colonoscopies should be done every 5 years or more often as needed. If a polyp is found, adherence to current polyp follow-up guidelines is recommended. In case of diagnosis of colorectal cancer**,** GATTEX therapy should be discontinued.

- *Small Bowel Neoplasia*

Based on benign tumor findings in the rat carcinogenicity study, patients should be monitored clinically for small bowel neoplasia. If a benign neoplasm is found, it should be removed. In case of small bowel cancer, GATTEX therapy should be discontinued.

Gastrointestinal obstruction

- Intestinal obstruction has been reported in clinical trials. In patients who develop intestinal or stomal obstruction, GATTEX should be temporarily discontinued while the patient is clinically managed. GATTEX may be restarted when the obstructive presentation resolves, if clinically indicated.

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