Risk Evaluation and Mitigation Strategy Programs in a Health System Setting

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Disclosure

No financial relationships to disclose
Objectives

• Define Risk Evaluation and Mitigation Strategy (REMS)

• Describe the role of a Drug Information Center and a REMS Pharmacist in a health system

• Define a process that can be created to ensure REMS Program requirements for a medication are addressed

• Describe ways to utilize technology to meet REMS requirements
Cleveland Clinic Health System

• 10 hospital health system
  — Inpatient beds: ~4000
  — Hospital Outpatient Clinics, Family Health Centers, and Ambulatory Surgery Centers: ~170
  — Employees: ~43,000
  — Physicians: ~2700

• Department of Pharmacy
  — Full time equivalents: 743
  — Inpatient Pharmacies: 10
  — Ambulatory Pharmacies: 15
Drug Information Center

• Located at Main Campus

• Eight drug information pharmacists
  — System Director, Drug Use Policy and Formulary Management
  — Four health system pharmacists
  — Focused areas of service

• Drug Information Resident
Services Provided

• Drug information call line for health care providers
• Formulary management
• Drug use policy
• Shortages and recalls
• Intravenous guidelines
• Adverse drug event reporting
• Pediatric drug information
• REMS Programs management
Health System Support

• Drug information center
  — Resource for health system

• Formulary management
  — Integrated formulary
  — Shared electronic medical record

• Policy and procedure development

• REMS programs
REMS Programs

• Strategy by the FDA to manage a known or potential serious risk associated with a drug or biologic product

• Support safe access to drugs that have known serious risks and would otherwise be unavailable

• FDA can mandate manufacturers to create REMS programs prior to or after drug approval
Considerations in Determining Need

• Estimated patient population size
• Seriousness of disease or condition
• Expected benefit of the drug
• Expected or actual duration of treatment
• Seriousness of any known or potential adverse events
• Drug is a new molecular entity
REMS Components

• Medication guide (MedGuide)
• Communication plan
• Elements to assure safe use (ETASU)
• Implementation system
• Assessment
REMS Components

- Medication guide (MedGuide)
- Communication plan
- Elements to assure safe use (ETASU)
- Implementation system
- Assessment
Elements to Assure Safe Use

• Prescribers have specific training, experience, or specially certified

• Settings that dispense the drug are specially certified

• Drugs dispensed to patients only in certain health care settings

• Drug dispensed only with evidence or other documentation of safe-use conditions

• Patient can be subject to certain monitoring

• Patient may be enrolled in a registry
REMS Programs

N = 208; Last update 2/25/13

Issue

• FDA issued REMS Programs
  — Health system requirements not clear
  — Increased pharmacist workload

• Goal
  — Coordination and standardization of REMS Programs throughout the health system
Justification of REMS Pharmacist

• Rationale
  – Health system integration proposal
  – Salary distributed amongst health system hospitals

• Health System REMS Pharmacist Position
  – Approved during budget planning in 2010
  – Start date planned for 2011
  – Required drug information training or experience
  – Point of contact for all REMS Programs
    – Inpatient and outpatient pharmacies
  – Other job responsibilities in Drug Information Center
REMS Process
REMS Pharmacist

- Pharmacy & Therapeutics Committee
- Key Pharmacists in Practice Area
- System Director, Drug Use Policy and Formulary Management

Best Practice Document

- Health System REMS Contacts provide feedback and standardize practice
- Electronic Medical Record Updated
- Internal Documents Updated, e.g., REMS website, restricted drug list, formulary software
- Best Practice Document Posted
- Pharmacy Staff Education
Checklist Created

- FDA REMS documents
- Company websites
- Contracts and information provided by wholesalers
- Representatives of REMS Programs contacted
Checklist: REMS Programs Considerations

• Pharmacy Enrollment and Responsible Persons Duties
• Procurement and Storage of Medication
• Medication Guide Requirements and Process
• Prescriber Enrollment and Pharmacy Notification
• Patient Enrollment and Verification
• Dispensing the Medication
• Laboratory Monitoring
• Electronic Software Updates
• Additional Considerations
• Patient Discharge
Prescribers must complete the following to become certified:
- Enrollment form
- Prescriber training program
- Read Healthcare Provider Letter
- Review Healthcare Provider education pamphlet
- Review Healthcare Provider REMS Education Slide Set
- Read full prescribing information of the medication
- Complete knowledge assessment

Patient Enrollment and Verification
- Do patients have to be enrolled in a program to receive the medication? [ ] Yes [ ] No
- Are patients actively or passively enrolled? [ ] Active [ ] Passive
- Does a patient enrollment form or patient-physician agreement need to be completed? [ ] Yes [ ] No
- Is it required to maintain a copy of the form in the medical record? [ ] Yes [ ] No
- Is there a process for scanning the patient-physician form into Epic? [ ] Yes [ ] No

Dispensing the Medication
- Does prescriber certification need to be verified? [ ] Yes [ ] No
- Does patient enrollment need to be verified? [ ] Yes [ ] No
- Does the Drug Information Center need to be notified a patient is receiving the medication? [ ] Yes [ ] No

Laboratory Monitoring
- Are there labs that are required to be monitored by the REMS Program? [ ] Yes [ ] No
- Do the labs have to be verified prior to dispensing the medication? [ ] Yes [ ] No
- The following labs need to be monitored per the REMS program:
- Do the labs designated as ETASUs have to be documented in the medical record? [ ] Yes [ ] No

Electronic Software Updates
- EMR software
  - Website links in sidebar
  - PDF links
    - Prescriber enrollment form
    - Patient enrollment form
    - Medication guide
    - Patient-Physician Acknowledgement or Agreement Form
    - Alternative Alert Screen
    - Pharmacist BPA
    - List of certified prescribers
    - Process for scanning papers for the medical record
- Online formulary management software
  - Restrictions
    - List of certified prescribers
    - Link to REMS policy/process
- Pharmacy webpage
  - Post REMS policy/process to Department of Pharmacy Intranet
  - Update restricted drug list

Additional Considerations
- Recommend safety monitoring that is not apart of the REMS, but is outlined in the prescribing information and/or REMS education materials.
    [ ] Yes [ ] No

Patient Discharge
- Can the inpatient pharmacy provide medication to the patient upon discharge? [ ] Yes [ ] No
- Process:
- Where does the patient obtain the medication?
REMS Programs Inpatient Challenges

• Safe use condition verification
  — Patient-physician acknowledgement forms
  — Patient identification number
  — Laboratory monitoring

• Certified prescriber verification

• Restricted distribution
  — Pharmacy enrollment
  — Procurement

• Electronic software updates

• Discharge prescriptions

• Optional REMS
## FDA: MedGuide Distribution Requirements

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<tr>
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</thead>
<tbody>
<tr>
<td>Inpatient</td>
<td>Yes</td>
<td>No – FDA enforcement discretion</td>
<td>No – FDA enforcement discretion</td>
<td>No – FDA enforcement discretion</td>
<td>Yes</td>
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<tr>
<td>Outpatient “Clinics”</td>
<td>Yes</td>
<td>No – FDA enforcement discretion</td>
<td>Yes</td>
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<td>Yes</td>
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<tr>
<td>Outpatient “Retail”</td>
<td>Yes</td>
<td>Yes</td>
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MedGuides and Technology

• Some REMS require inpatients to receive a medication guide at first dose or before discharge

• Electronic medical record
  — Create linked order
  — Add links to medication administration record (MAR)
  — Add links to alert for ordering prescribers

| The Pharmacy and Therapeutics Committee has restricted this drug: | Medication Guide Enrollment Form |

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## Elements to Assure Safe Use

<table>
<thead>
<tr>
<th>ETASU</th>
<th>Inpatient Pharmacist Responsibilities</th>
<th>Examples</th>
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</thead>
<tbody>
<tr>
<td><strong>Prescribers</strong>: specific training, experience, or certified</td>
<td>Verify certified prescribers</td>
<td>ambrisentan, ESAs, dofetilide</td>
</tr>
<tr>
<td><strong>Hospital</strong>: certified</td>
<td>None</td>
<td>TIRF</td>
</tr>
<tr>
<td><strong>Drug</strong>: dispensed only for inpatients</td>
<td>None</td>
<td>Dofetilide initiation</td>
</tr>
<tr>
<td><strong>Safe-use conditions</strong>: documented</td>
<td>Verify documents or labs completed</td>
<td>clozepine, ESAs</td>
</tr>
<tr>
<td><strong>Patient</strong>: monitoring required</td>
<td>Verify monitoring completed</td>
<td>isotretinoin, thalidamide</td>
</tr>
<tr>
<td><strong>Patient</strong>: enrolled in a registry</td>
<td>Verify patient enrollment</td>
<td>ambrisentan, clozapine</td>
</tr>
</tbody>
</table>

ESAs: erythropoiesis-stimulating agents, ETASU: elements to assure safe use, TIRF: transmucosal immediate release fentanyl
Certified Prescriber

• Select REMS programs require a certified, or enrolled, prescriber for inpatient use of the medication
  —Examples: dofetilide, bosentan, ESAs for chemotherapy-induced anemia

• Electronic medical record drug files shared across health system
  —Maintain list of certified prescribers

• Formulary software
  —Maintain list of providers for inpatient and outpatient use
Electronic Medical Record Alerts

- Order entry
  - Alert screens for prescribers
  - Lists information

- Order verification
  - Alert screens for pharmacists
  - Provides links to information

**************RESTRICTED DRUG SERVICE**************

The Pharmacy and Therapeutics Committee of the Cleveland Clinic has RESTRICTED the use of this drug to the following conditions:

Restricted to certified prescribers of the dofetilide REMS program:

Certified prescribers are listed alphabetically

*Restricted Drug Service*: The Pharmacy and Therapeutics Committee of the Cleveland Clinic has RESTRICTED the use of this drug. View the Restricted Drug List by: 1) Click on the Hyperlink below to go to the Restricted Drug List or 2) Formulary Monograph LINK TO RESTRICTED DRUG INFORMATION

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Safe-use Conditions Documented

• Select REMS require paper work to be signed prior to dispensing medication
  — Example: ESAs for chemotherapy-induced anemia, mycophenolate (optional)

• Electronic medical record
  — Alert prescribers of requirement
  — Store forms in patient file
Safe-use Conditions Documented

• Alerts in electronic medical record
  — For prescribers and pharmacists

  The Food and Drug Administration has REQUIRED the following procedure be used with this drug:
  
  Chemotherapy-induced anemia:
  The prescriber must be enrolled in the REMS program. With every course of therapy the patient must be
counseled on adverse effects and given a medication
guide (link to right). They must also sign a patient
acknowledgement form (link to right) and fax to pharmacy.

  Alphabetical list of certified prescribers

• Indication question for prescribers to answer

  What is the indication for therapy?
  • Chemotherapy-induced anemia – patient given
    medication guide and signed acknowledgement form
  • Other – no signature required from patient
Store Forms

• Process for scanning acknowledgement forms into the electronic medical record
  — Drug Information Center is faxed all forms
  — Forms reviewed by REMS Pharmacist and sent to medical records to be scanned
    — Verify patients’ medical record number and date of birth

• Forms available in patients’ chart
  — Pharmacists can contact prescriber
Monitoring Documented

• Select REMS medications require certain lab values to be monitored
  — Example: clozapine

• Electronic medical record
  — Alert prescribers of required lab values
  — Drug file lists lab values during order verification
Inpatient Pharmacy Resources

• Formulary software
  — Formulary restriction criteria
  — Links to policies and charts
  — General REMS information
  — Incorporated certified prescriber lists

• Electronic medical record

• Internal websites
  — REMS webpage
    — Best Practices Documents posted
  — Restricted drug list
Electronic Software Updates

• Health system issue:
  — Ensure standardization

• Solution:
  — REMS Pharmacist initiates all updates

• Maintenance
  — List of certified prescribers
  — Process changes
  — Pharmacy and Therapeutic Committee decisions
REMS Programs Outpatient Challenges

• Physician and pharmacy staff education
• Location of information
• Software capabilities
• Restricted Drug Distribution Systems (RDDS)
  — Availability of products
  — Insurance coverage
Staff Education

• Select REMS state pharmacy staff is to be educated on REMS requirements
  — Only one pharmacist required to undergo formal training
  — Education may be subject to audit

• Educate staff
  — Create standard operating procedures for each REMS medication
  — Annual competency about REMS
  — Post all information on internal website
Restricted Drug Distribution

• Not all medications are available outpatient pharmacies
  — REMS programs, RDDS, specialty pharmacy status
    — Not all medications covered by patient’s insurance based on pharmacy status
    — Some medications can not be loaned between pharmacies

• Create list of medications with REMS and RDDS
  — Provide information for pharmacists to determine how patients can obtain the medication
Summary

• REMS Pharmacist/Coordinator:
  — Standardizes practice in the health system
  — Efficient evaluation of new REMS Programs
  — Reference for processes and templates of successfully implemented REMS Programs

• Evaluate all REMS documents
  — FDA documents
  — Company websites
  — Call REMS representatives
  — Ask specific questions
Questions