



**Nov. 4, 2021**

**To: Providers and Pharmacists**

**From: Partners Pharmacy Services**

**RE: New Clozapine REMS System Coming November 15, 2021**

To help manage the risk of neutropenia, the Food and Drug Administration (FDA) is mandating a Risk Evaluation and Mitigation Strategy (REMS) for clozapine. On July 29, 2021, [FDA approved](#) a modification to the Clozapine REMS, in conjunction with the Clozapine Product Manufacturers Group (CPMG).

Many providers and pharmacists are VERY concerned that this new REMS may be creating more barriers to clozapine use and is a deterrent to those who want to use the gold standard for their members who need this therapy.

The modification to Clozapine REMS will go into effect on November 15, 2021.

<https://www.fda.gov/drugs/postmarket-drug-safety-information-patients-and-providers/information-clozapine>  
Important changes include:

- All prescribers and pharmacies must be re-certified by November 15, 2021, or they will no longer be able to prescribe/dispense clozapine.
- Prescribers must re-enroll their patients who will continue clozapine by November 15, 2021. Patients who are not re-enrolled by that day will no longer be able to receive clozapine.
- Pharmacies will no longer be able to use the telecommunication verification (also known as the switch system) to verify safe use conditions. The authorization to dispense RDA will be obtained either through the contact center or online via the REMS website.
- A new Patient Status Form (PSF) will document absolute neutrophil count (ANC) monitoring for all outpatients. This form must be submitted monthly. Patient ANC monitoring must continue per the Prescribing Information however this is provider-driven in the new system. After enrolling the patient, the REMS system requires a detailed Patient Status Form (PSF) monthly. Currently there is no electronic PSF to use.
- Provider or pharmacy failure to re-enroll or re-certify may lead to clozapine interruption, which could result in significant consequences and negative outcomes for individuals stabilized on clozapine.
- Designee assignment: Providers must initiate the designee process. Further, pharmacists in the past have been in a position to be named provider designee for more than one provider. This will not be the case in the new REMS system. Also, nurses may not be designees for more than one provider. There must be a 1:1 relationship between the provider and the designees in the new REMS.
- The ANC monitoring frequency will not automatically change on its own. The prescriber will have to keep note of when they switch to every-two week or monthly monitoring because the program will no longer notify you like before.
- Inpatient vs. Outpatient Management: -If a community hospital admits a patient on clozapine and the pharmacist obtains a Required Dispense Authorization (RDA), and then the patient is discharged three days later, the inpatient pharmacist must reverse the RDA so the outpatient pharmacy can fill the prescription. An RDA for an inpatient is only required initially. As long as the patient is hospitalized, no follow-up RDA is necessary. The RDA requirements for new starts in the hospital follows the ANC lab draw frequency, so ANC weekly then obtain weekly RDA, if monthly, then monthly RDA etc.

The following bulleted information regarding changes in the clozapine REMS was obtained in part, from a College of Psychiatric and Neurologic Pharmacists (CPNP) presentation on the new REMS, as well as the Serious Mental Illness (SMI) Advisor website.

### **The New REMS – Changes and Concerns for Everyone**

- No carryover of historical patient data and this no carryover of National Non-Rechallenge Master File also called the “Do Not Rechallenge List”
- Don’t need to go online; the old (current) online system was considered difficult to navigate
- Everyone must re-enroll – patients, prescribers, pharmacies
  - New REMS vendor: Syneos Health®
  - New phone number: 888-586-0758
  - New fax number: 800-878-5927
  - Transition website: NewClozapineREMS.com

### **The New REMS – Changes and Concerns for Prescribers**

- Designee changes: Prescriber must initiate appointment of designee
- Prescriber registration requires DEA
- Patient Status Form (PSF) is five pages long- and requires monthly completion and data submission
- System no longer requires actual ANC value
- Adhering to the clozapine product labeling, the prescriber determines the ANC monitoring frequency (Q week, Q 2 week, Q month)
- The prescriber determines the need to continue treatment in the face of an abnormal ANC
- Presently, there is a limit of a seven day supply on discharge from inpatient facility to community
- Only prescribers (and not designees) may:
  - Designate a patient as a Hospice Care Patient
  - Designate a patient as a BEN patient
  - Authorize continuation of therapy if labs are missing
  - Create a Treatment Rationale
  - Initiate appointment of a designee

### **Prescribers – What You Need To Do**

- All prescribers must re-enroll!
- Review Clozapine and the Risk of Neutropenia: A Guide for Healthcare Providers
- Complete the Knowledge Assessment for Healthcare Providers (Three chances to successfully pass exam)
- Submit Prescriber Enrollment Form and the Knowledge Assessment for Healthcare Providers
- Enroll a designee (optional) using the Prescriber Designee Form
- Enroll patients

### **The New REMS – Changes and Concerns – for Pharmacists**

- Wholesalers requested to avoid selling to non-registered pharmacies
- A pharmacy can have two authorized representatives- cannot be both a representative and a designee

- A pharmacy doesn't need to recertify every two years, however, needs to confirm authorized representative hasn't changed.
- Individual pharmacists do not need to complete Knowledge Assessment Quiz

### **Pharmacists/Dispensing Pharmacies – What You Need To Do**

- Must recertify
- Must obtain a REMS Dispense Authorization (RDA) to dispense each prescription
- RDA is only available from REMS website or by calling REMS Contact Center
- No longer available via SWITCH (pharmacy management system)
- Can submit ANCs via ANC Lab Reporting Form
- Pharmacies must re-enroll!
  - Create an account with authorized representative
  - Review Clozapine and the Risk of Neutropenia: A Guide for Pharmacists.
  - Authorized representative must complete the Knowledge Assessment for Pharmacies.
  - Submit enrollment form as inpatient or outpatient pharmacy
  - Contact prescribers to have them submit a pharmacist as designee if desired
  - Train staff
  - Add staff online in “manage personnel” section
  - Individual staff are emailed to establish own credentials

### **Patient Status Form Details (PSF)**

- Submission of monthly ANCs (or ranges)- Provider (not designee) must complete
- PSF sections for monthly, every two week, weekly and three times per week monitoring frequencies
  - Interrupt, discontinue or resume treatment
  - Designate a patient as a Hospice Care Patient
  - Designate a patient as a BEN patient
  - Authorize continuation of therapy if labs are missing
  - Record/change the monitoring frequency
  - Create a Treatment Rationale- a section on the PSF where the prescriber signs to continue treatment in a patient with an ANC of 500-999/ $\mu$ L (or < 500/ $\mu$ L for a patient with BEN)

### **Required Dispense Authorization Details (RDA)**

- Before a pharmacy dispenses clozapine to a patient, it must first obtain an RDA
- Pharmacist may also reverse an RDA (so patient may obtain medication elsewhere)
- An RDA assures that:
  - The pharmacy is certified
  - The patient is enrolled
  - A PSF has been completed in the last 37 days
  - The prescriber has authorized continuation of treatment if labs are missing
  - The prescriber has provided a Treatment Rationale if the ANC < the acceptable range
  - The patient's treatment has not been interrupted or discontinued

## Dispense Rationale (Pharmacist Medication Dispense Override) Details

- Can override system three times per year with a Dispense Rationale to avoid disruption in patient care
- Used to continue to dispense to enrolled patients when PSF not received in 37 days
- When no PSF (in last 37 days), Dispense Rationale presented automatically
- Pharmacy doesn't need to see labs to dispense
- Authorization to dispense REMS Dispense Authorization (RDA) no longer available through SWITCH (pharmacy management system)
- RDA available only thru website or REMS contact center
- Pharmacist needs
  - An ANC less than 31 days old
  - The prescribers NPI number
- **Outpatient pharmacies** are limited to three Dispensing Rationales per patient per year/ **Inpatient pharmacies** can submit unlimited Dispensing Rationales

On Oct. 21, 2021, the College of Psychiatric and Neurologic Pharmacists (CPNP), the National Alliance on Mental Illness (NAMI), the American Psychiatric Association (APA), the American Pharmacists Association (APhA), the American Psychiatric Nurses Association (APNA), the National Association of State Mental Health Program Directors (NASMHPD) and the National Council for Mental Wellbeing met with numerous representatives from various divisions of the FDA and the Clozapine Product Manufacturers Group. This meeting was a follow up to the shared organizational concerns about the new clozapine REMS. The agenda addressed the concerns that have emerged as the health providers have attempted to use or plan for the new clozapine REMS. The meeting was characterized as an "FDA Listening Session."

While no resolution was reached, Clozapine Product Manufacturers Group (CPMG) noted they were working on a new 90 day transition plan to reduce the risk of patients not getting their clozapine. However, they did not supply specifics, state when enhancements would be implemented.

Below are links taking you to more detailed information regarding the new clozapine REMS. The CPNP webinar is member protected but SMI Adviser information is free and open access.

- Resources regarding new Clozapine REMS
  - [Keeping Up with Clozapine REMS: A Guide to Navigating the November 15 Changes](#) (1.0 AMA PRA Category 1 Credits™) is a one hour free CME program (not sure about pharmacist CE) from SMI Adviser, a collaboration of SAMHSA and APA. The slides are attached.
  - [CPNP -New Clozapine REMS CPNP Webinar](#) Covers questions on the REMS test, after a review done by the College of Psychiatric & Neurologic Pharmacists (who also were part of the SMI Adviser CE program above) . The accompanying *New Clozapine REMS FAQs CPNP 2021* are also a good resource (MEMBERSHIP REQUIRED)
  - [HTTP://NewClozapineREMS.com](http://NewClozapineREMS.com)
  - [FDA Press Release-Announcement of New Clozapine REMS](#) July 29, 2021.