DEPARTMENT OF HEALTH & HUMAN SERVICES

Food and Drug Administration
Silver Spring, MD 20993

April 18, 2014

Fed Up! Coalition
Via fedupcoalition@gmail.com

Dear Fed Up! Coalition:

Thank you for your letter of February 26, 2014, to Dr. Margaret Hamburg, Commissioner, Food and Drug Administration (FDA or the Agency), which included signatories representing more than 40 organizations, regarding FDA's approval of Zohydro ER (hydrocodone bitartrate, extended-release), a single-agent hydrocodone product. Your letter was referred to the Center for Drug Evaluation and Research for response.

You ask that FDA adopt the Anesthetic and Analgesic Drug Products Advisory Committee (AADPAC) recommendation of Dec. 7, 2013, and rescind approval of Zohydro ER.

The FDA's advisory committees provide independent expert opinion and advice to the Agency on a range of complex scientific, technical, and policy issues. While FDA considers advisory committee opinions very seriously, an advisory committee's recommendations are not binding on the Agency's final decisions.

FDA approved Zohydro ER based on our conclusion that the benefits outweigh its risks, and because it offers a new option for the management of pain severe enough to require daily, around-the-clock, long-term treatment for which alternative treatment options are inadequate. As a single entity hydrocodone product, it is not associated with the liver toxicity risk of the combination hydrocodone products that include acetaminophen. FDA also believes that the mandated new safety labeling changes — which apply to all extended-release long-acting (ER/LA) opioid analgesics — will improve the appropriate use of Zohydro ER.

The approved labeling for Zohydro ER includes prominent warnings about abuse, including a boxed warning citing the known serious risks of addiction, abuse, and misuse, among other critically important risks. The labeling urges prescribers to "assess each patient's risk" before prescribing the drug, and to "monitor all patients regularly for the development of addiction, abuse, and misuse."

The approved label for Zohydro ER is available online at:
http://www.accessdata.fda.gov/drugsatfda_docs/label/2013/202880s000lbl.pdf

In addition to labeling, Zohydro ER is subject to the ER/LA Opioid Analgesics Risk Evaluation and Mitigation Strategy (REMS), which is intended to reduce serious adverse outcomes resulting from inappropriate prescribing, misuse and abuse. The REMS requires the distribution of a Medication Guide with each prescription filled, and requires that training about proper prescribing and patient monitoring be made available to prescribers of ER/LA opioids. Zohydro's sponsor is also required to conduct post-market studies to assess the risks of misuse, abuse, hyperalgesia, addiction, overdose, and death associated with long-term use of the product once on the market.

The ER/LA opioid analgesic REMS is available online at:
http://www.fda.gov/downloads/Drugs/DrugSafety/PostmarketDrugSafetyInformationforPatientsandProviders/UCM311290.pdf

Appropriate pain management as well as prevention of prescription opioid abuse are top public health priorities at FDA. Please be assured that FDA shares your concerns about the serious risks of abuse and misuse associated with Zohydro ER and other opioid drug products, and will continue taking all appropriate actions to address those risks while ensuring that patients in pain have access to vital pain medications.

Thank you, again, for contacting us concerning this important issue. Please let us know if you have further questions.

Sincerely,

Janet Woodcock, MD
Director
Center for Drug Evaluation and Research