

Why Are We Still Talking About the Mycophenolate REMS in 2024?



This activity is supported by an independent educational grant from the Mycophenolate REMS Group. This activity is intended to be fully compliant with the Mycophenolate REMS education requirements issued by the U.S. Food and Drug Administration (FDA).



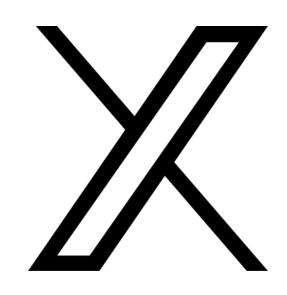
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Mycophenolate REMS (MREMS) Introduction Michelle Josephson, MD

Mycophenolate Teratogenicity and the Mycophenolate Risk Evaluation and Mitigation Strategy (REMS)

Emergence of evidence about mycophenolate teratogenicity paralleled the emergence of REMS programs in the United States

Pattern of malformations among infants born to pregnant women treated with mycophenolate during early pregnancy led to:

- PI boxed warning in 2007
- Medication guide in 2008



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FDA Amendments Act (FDAAA) in **2007** charged FDA with the implementation of REMS

- To ensure benefit outweighs risk
- To enforce safe use behaviors



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MREMS* introduced in 2012

FDA Amendments Act (FDAAA) in **2007** charged FDA with the implementation of REMS

- To ensure benefit outweighs risk
- To enforce safe use behaviors

*From 2012 to 2023, the MREMS was available as a shared system (SS) REMS program. A parallel system (PS) MREMS, instituted as part of the FDA's waiver process to protect patents/trade secrets, was introduced in late 2023. Both MREMS programs are now available and include the same goals and resources.



Goals of the Mycophenolate REMS

Educate health care providers on:

- Increased risks of first trimester pregnancy loss and congenital malformations with exposure to mycophenolate
- Counseling patients of reproductive potential on preventing pregnancies when taking mycophenolate
- Reporting pregnancies to the Mycophenolate Pregnancy Registry
- Reporting pregnancies to the Transplant Pregnancy Registry International (TPRI), formerly the National Transplantation Pregnancy Registry (NTPR)

Educate patients on:

- Increased risks of miscarriage and birth defects
- Importance of pregnancy prevention and planning when taking mycophenolate
- Participating in the Mycophenolate Pregnancy Registry
- Participating in the TPRI





Why Are We Still Talking About the MREMS?

- MREMS has been suboptimal at best in preventing prenatal exposure
- New and evolving abortion laws leave limited options when accidental prenatal exposure occurs
 - Absolute or 6-week abortion bans restrict opportunity to consider pregnancy termination
 - The potential for malformations is generally not recognized as an exception to strict abortion laws



Mycophenolate in Clinical Perspective Michael Moritz, MD



Learning Objective

Evaluate embryofetal toxicity and pregnancy risks associated with the use of mycophenolate.

Audience Response

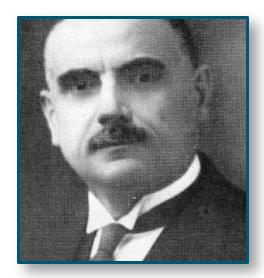
What percentage of infants born to an individual exposed to mycophenolate during the first trimester of pregnancy are born with congenital abnormalities?

- A. ~10-15%
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- C. ~45-50%
- D. More than 50%
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Mycophenolic Acid (MPA): Brief History

- First antibiotic purified from any source
- Discovered in 1893 by Italian physician and scientist Bartolomeo Gosio
- Mycophenolic acid = acidic phenol from a fungus
- "Re-discovered" as an antibiotic, antifungal, antiviral, antitumor, and at one time considered a mycotoxin
- 1960s: immunosuppressive properties identified



Dr. Bartolomeo Gosio



Mycophenolate Products: FDA Indications



- Mycophenolate mofetil (MMF)
 - IV solution, PO capsule/tablet/oral suspension
 - FDA labeled indications: prophylaxis of organ rejection in allogeneic kidney, heart, or liver transplants in combination with other immunosuppressants
- Delayed-release mycophenolic acid sodium
 - PO tablets
 - FDA labeled indications: prophylaxis of organ rejection in allogeneic kidney transplants





Mycophenolate Products: Off-Label

- Other solid organ transplantation, bone marrow transplantation
- Rheumatoid arthritis
- Inflammatory bowel disease
- Psoriasis
- Autoimmune diseases (lupus, vasculitis, etc.)











MPA: Immunosuppressive Effect

- MPA inhibits inosine-5'monophosphate dehydrase (IMDPH)
- Cellular proliferation requires DNA synthesis
- its building block can

De novo purine synthesis

 Inhibiting formation of prevent organ rejection

PRPP MMF Plasma **IMP** esterases **IMPDH XMP** GMP synthase **GMP** GTP and dGTP DNA synthesis and cell proliferation

dGTP = deoxyguanosine triphosphate; GMP synthase = guanosine monophosphate synthetase; GTP = quanosine-5'-triphosphate; IMP = inosine 5'-monophosphate; IMPDH = inosine-5'-monophosphate dehydrogenase; MMF = mycophenolate mofetil; MPA = mycophenolic acid; PRPP = phosphoribosyl diphosphate; XMP = xanthosine 5'-monophosphate.

Human Teratogenicity of MPA First Described in 2001





- First case report in 2001 was a child born with hypoplastic nails and shortened fingers to a mother who had been exposed to mycophenolate
- This was the tip of the iceberg as many other subsequent reports followed



Mycophenolate Embryopathy



Microtia or anotia



Auditory canal atresia or conductive deafness





Cleft lip and palate



Congenital heart defects



Other frequent
manifestations include
dysmorphic features of the
face and distal limb
anomalies.



Embryofetal Risk

National Transplantation Pregnancy Registry (NTPR) 2006:

- 24 female transplant patients reported 33 mycophenolateexposed pregnancies. Of these pregnancies, there were:
 - → 15/33 (45%) spontaneous miscarriages
 - → 4/18 (22%) structural malformations in live-born infants
- Post-marketing data (Roche) of 77 patients exposed to systemic mycophenolate during pregnancy (1995-2007):
 - → 25 patients (33%) had spontaneous abortions
 - → 14 (18%) had a malformed fetus or infant



Mycophenolate FDA Boxed Warning

WARNING: EMBRYOFETAL TOXICITY, MALIGNANCIES AND SERIOUS INFECTIONS

See full prescribing information for complete boxed warning

- Use during pregnancy is associated with increased risks of first trimester pregnancy loss and congenital malformations. Avoid if safer treatment options are available. Females of reproductive potential must be counseled regarding pregnancy prevention and planning [see Warnings and Precautions (5.1)].
- Increased risk of development of lymphoma and other malignancies, particularly of the skin [see Warnings and Precautions (5.2)].
- Increased susceptibility to infections, including opportunistic infections and severe infections with fatal outcomes [see Warnings and Precautions (5.3)].



Risk Mitigation: Pregnancy Prevention and Planning

- NTPR annual report compared pregnancies conceived on mycophenolate to those conceived when mycophenolate was discontinued at least 6 weeks prior to conception
 - Rate of miscarriages in pregnancies with mycophenolate as high as 48% compared to 22% when mycophenolate was discontinued
- Adequate contraception is critical



Safer Alternatives to Mycophenolate Products?

- Most immunosuppressants → limited embryofetal risk data in humans
- Azathioprine (AZA)
 - Older immunosuppressant
 - Animal teratogenicity
 - Longer history of use in pregnancy
 - Retrospective cohort study comparing pregnancies exposed to MPA to those on AZA during the first trimester
 - 55/111 (49.5%) pregnancy loss with MPA vs. 113/471 (24%) with AZA
- mTOR inhibitors (e.g., sirolimus, everolimus)
 - Animal teratogenicity
 - Safety data about fetal exposure to mTOR inhibitors in humans is sparse
 - Despite reports of successful pregnancy in sirolimus- or everolimus-treated kidney transplant recipients, KDIGO guidelines advise against mTOR use



Counseling Patients of Reproductive Potential

Michelle Josephson, MD



Learning 2 Objective

Counsel patients of reproductive potential on pregnancy prevention and/or planning during mycophenolate treatment.

Audience Response

What percent of pregnancies are unplanned?

- A. 18%
- B. 25%
- C. 40%
- D. 54%
- E. I'm not sure



Prenatal Exposure to Teratogenic Drugs is Common

Original Research

ajog.org

OBSTETRICS

Prenatal exposure to teratogenic medications in the era of Risk Evaluation and Mitigation Strategies



Amir Sarayani, PharmD, MPH; Yasser Albogami, PhD, MPH; Thuy Nhu Thai, MPH, BSPharm; Nicole E. Smolinski, PharmD; Preya Patel, PharmD; Yanning Wang, MS; Sabina Nduaguba, PhD; Sonja A. Rasmussen, MD, MS; Almut G. Winterstein. RPh. PhD

BACKGROUND: Prevention of prenatal exposures to teratogenic drugs is a significant clinical and public health concern. With the enactment of the US Food and Drug Administration Amendments Act in 2007, the US Food and Drug Administration has begun to require manufacturers to implement Risk Evaluation and Mitigation Strategies to prevent prenatal exposures. Among 12 risk evaluation and mitigation strategy drugs, several had predecessor risk mitigation plans (eg, isotretinoin) and some were newly required (eg, mycophenolate). Only a small proportion of teratogenic drugs are currently subject to Risk Evaluation and Mitigation Strategies, and the extent of prenatal exposure to the universe of teratogenic drugs compared with drugs subject to Risk Evaluation and Mitigation Strategies is unknown. Moreover, the effectiveness of such advanced risk mitigation programs in preventing prenatal exposure is not clear.

OBJECTIVE: This study aimed to characterize the epidemiology of prenatal exposures to definite and potential teratogens during the risk evaluation and mitigation strategy era.

STUDY DESIGN: We constructed a time-series of pregnancies identified from a national private insurance claims database (IBM MarketScan) to estimate prenatal exposures to teratogenic drugs (2006—2017). Pregnancy outcomes, gestational age, and the onset of pregnancy were determined with previously validated algorithms. The Teratology Information Service and Clinical Pharmacology databases were used to identify

exposure, and state healthcare quality rankings on prenatal exposure, adjusting for demographic factors and clinical conditions.

RESULTS: The cohort included 3,445,612 pregnancies (2,532,444 live deliveries). Prenatal exposures to definite teratogens decreased slightly during the study years from 1.86 to 1.24 per 100 pregnancies between 2006 and 2017, whereas exposure increased for potential teratogens from 3.40% to 5.33%. Prenatal exposure prevalences were higher during the first trimester and for pregnancies that ended in nonlive outcomes. Drugs subject to Risk Evaluation and Mitigation Strategies had low background utilization and contributed to a small proportion of prenatal exposures (15.1 per 100,000 pregnancies). We also observed fewer prenatal exposures to risk evaluation and mitigation strategy drugs among women of childbearing age who used these treatments (0.14% vs 0.36% for any definite teratogen). Age extremes and low state-level healthcare quality rankings were independent predictors of prenatal exposures.

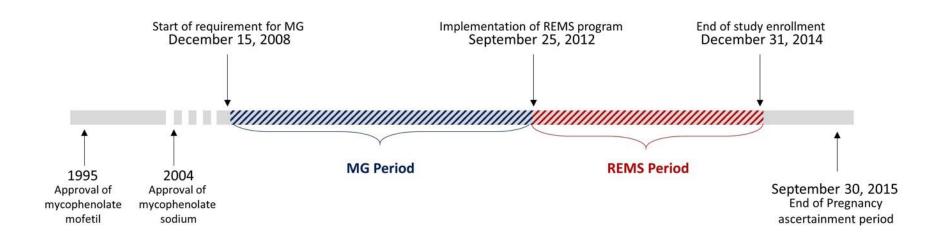
CONCLUSION: Fetuses in more than 1 in 16 pregnancies continued to be exposed to teratogenic drugs during the past decade. Drugs with Risk Evaluation and Mitigation Strategies imposed a small burden of prenatal exposure because of the low background utilization rates and lower pregnancy prevalence among women of childbearing age who used these drugs. Although the declining exposure rates to teratogenic drugs with definite risk are encouraging, the rising prenatal exposure to drugs with potential risk calls for more assessments. Future research is

- About 1 in 16 pregnancies is exposed to medications with known or potential teratogenicity
- Few (currently 10) medications have REMS
- Type of REMS varies from requirement of a negative pregnancy test prior to dispensing (for example, isotretinoin) to only additional written information for patients



Mycophenolate REMS

REMS: Original MG, mandate for sponsor to train prescribers, prescriberpatient acknowledgment form, website, pregnancy registry





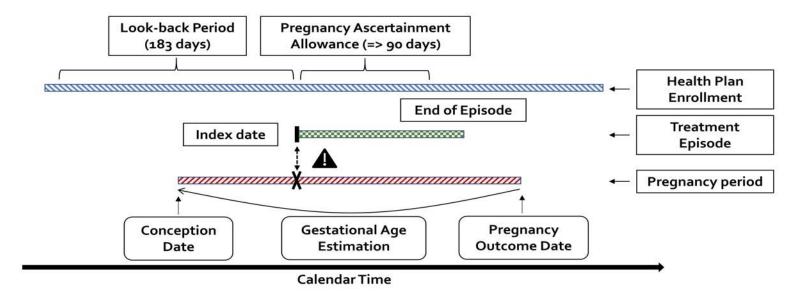
Data Source/Eligibility Criteria

- Data Source: MarketScan Databases 2008-2015 (national sample of privately insured patients)
- Eligibility Criteria:
 - Persons of reproductive potential age 15-44
 - Filled at least one prescription for oral MPA
- Unit of Analysis: MPA treatment episode (multiple episodes allowed)
- Index date: Dispensing day of the first MPA prescription in each episode
- Look-back period: 6 months



Analysis-1: REMS Goal – Rule Out Pregnancy at Treatment Initiation

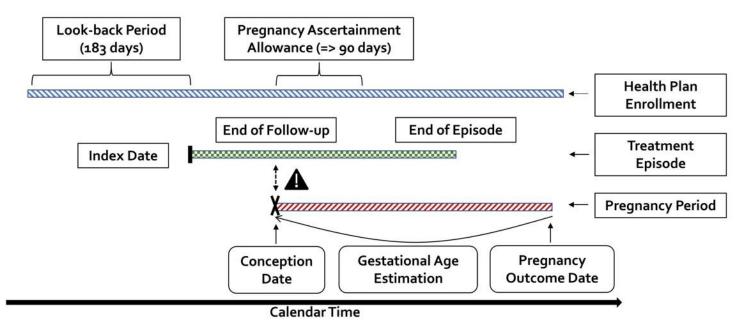
Proportion of patients pregnant at treatment initiation





Analysis-2: REMS Goal – Prevent Conception During Treatment

Rate of conception during treatment episode





REMS May Affect Safe Use Behaviors Differently

Comparison of fetal exposure risk during mycophenolate treatment during era of medication guide vs. REMS program

	Med Guide period	REMS period	Relative measures of frequency
Proportion pregnant at mycophenolate treatment initiation	4.1 (3.2-5.4) per 1000 initiations	1.7 (1.0-2.9) per 1000 initiations	Prevalence ratio = 0.42 (0.24-0.74)
Rate of conception during mycophenolate treatment	12.9 (9.9-16.9) per 1000 exposure-years	12.5 (8.9-17.6) per 1000 exposure- years	Rate Ratio = 0.97 (0.63-1.49)

REMS did decrease mycophenolate initiation during pregnancy (i.e., prescribers evaluating pregnancy status prior), but contraception during use did not improve

Why Does This Happen?

Reason for Pregnancy	Year 12 3/1/17-2/28/18 N = 185; N (%)	Year 13 3/1/18-2/28/19 N = 182; N (%)	Year 14 3/1/19-2/28/20 N = 186; N (%)	Year 15 3/1/20-2/28/21 N = 189; N (%)	Year 16 3/1/21-12/10/21 N = 184; N (%)	F
Contraceptive Failure	52 (28.1)	15 (8.2)	26 (14.0)	38 (20.1)	30 (16.3)	
Contraceptive Not Used Date Conceived	2 (1.1)	2 (1.1)	7 (3.8)	8 (4.2)	3 (1.6)	
Did Not Use 2 Birth Control Methods	64 (34.6)	65 (35.7)	48 (25.8)	43 (22.8)	56 (30.4)	
Unsuccessful at Abstinence	34 (18.4)	48 (26.4)	49 (26.3)	43 (22.8)	41 (22.3)	
Used Ineffective Contraception	3 (1.6)	2 (1.1)	0 (0)	4 (2.1)	3 (1.6)	
Planned Pregnancy	0 (0)	1 (0.5)	0 (0)	0 (0)	0 (0)	
Other	1 (0.5)	10 (5.5)	6 (3.2)	5 (2.6)	9 (4.9)	E E
Unknown	15 (8.1)	35 (19.2)	49 (26.3)	44 (23.3)	43 (23.4)	ŀ
Missing	16 (8.6)	10 (5.5)	9 (4.8)	15 (7.9)	15 (8.2)	

Risk for pregnancy during use of isotretinoin vs. other oral acne medications

	Relative risk		
Overall	0.25 (0.21, 0.29)		
Age 15 - 19	0.44 (0.28, 0.68)		
Age 20 - 29	0.22 (0.17, 0.27)		
Age 30 - 39	0.17 (0.12, 0.24)		
Age 40 - 44	0.55 (0.22, 1.39)		

Albogami Y, et al. *Drug Saf.* 2021;44(4):447-454. U.S. Food and Drug Administration [FDA]. *FDA Briefing Document: Risk Evaluation and Mitigation Strategy (REMS) for Isotretinoin Products.* 2023. https://www.fda.gov/media/166485/download.



What Can We Do?

40% of pregnancies are unplanned

Implementing MREMS in clinical practice can be difficult

- Time constraints
- Patient perceptions
- Level of comfort
- Addressing culture, language, health literacy

Strategies to reduce poor outcomes include counseling patients on adequate contraception, performing pregnancy screening, and reporting pregnancies to the mycophenolate pregnancy registry. Consider culture, language, health literacy, and other social determinants of health when counseling patients.



Preparing for the Conversation

1.
Address
reproductive
goals prior to
start of
mycophenolate:

- Sexual activity
- Sexual orientation
- Desire for pregnancy

2.

Create an open, supportive, and non-judgmental environment

3.

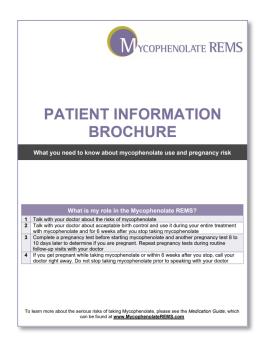
Increase your knowledge and self-efficacy in providing contraception counseling

4

Consider incorporating MREMS into your documentation and clinic workflow



Contraception Counseling



Who do we counsel?

- Patients of reproductive potential (puberty → menopause)
- Exclude: hysterectomy, oophorectomy, premature menopause

How often should we counsel?

Prior to initiation of mycophenolate and at every follow-up visit

When to use contraception?

- During treatment
- At least 6 weeks after ending medication

Frequency of pregnancy screening?

- Immediately prior to start of treatment
- 8-10 days after starting
- At every follow-up encounter
- 6 weeks after discontinuation



Acceptable Birth Control Options

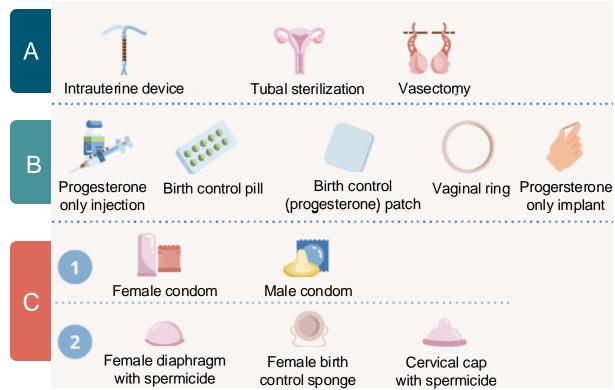
 1 method from category A

or

 1 method from category B and 1 method from category C1 or C2

or

 1 method from category C1 and 1 method from category C2





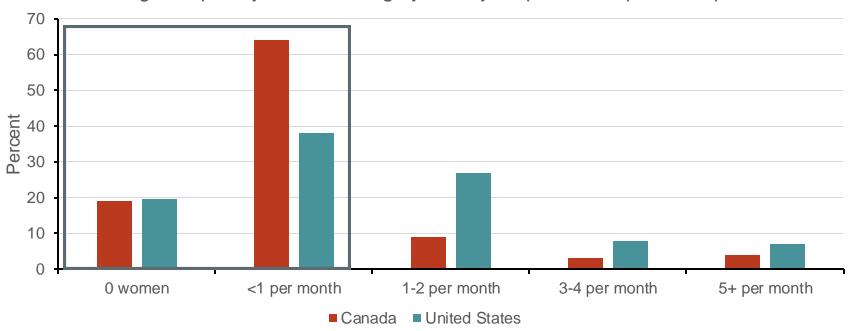
Emergency Contraception

Type of emergency contraception	Weight restrictions?	How soon after sexual encounter?	How it works?	How to provide to patient?
Plan B (Levonorgestrel)	Ideally < 165 lbs	Within 3 days	Prevents ovulation or prevents an egg from attaching to uterus	Over the counter [Four-year shelf life]
ELLA (Ulipristal)	Ideally < 195 lbs	Within 5 days	Prevents ovulation	Prescription [Three-year shelf life]
Copper Intrauterine Device	100% effective Any weight	Within 5 days	Nonhormonal – copper ions mainly affect sperm motility	Referral to a healthcare provider



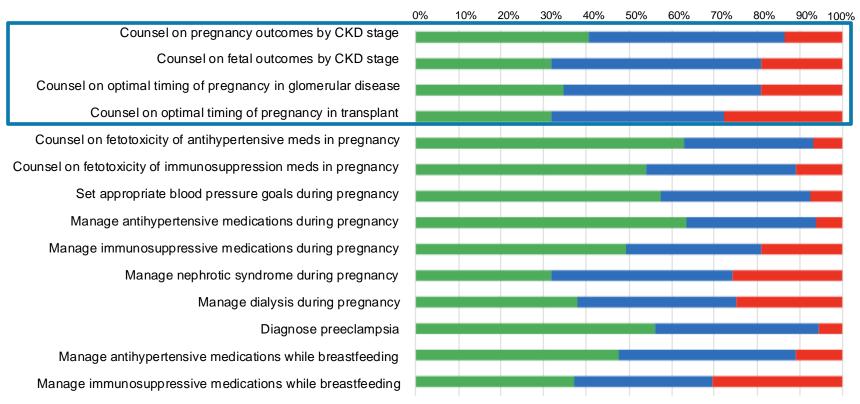
Contraception in Kidney Transplant Recipients







Contraception in Kidney Transplant Recipients: Nephrologists' Confidence in Managing Pregnancy-Related Topics



Confident/Very Confident Somewhat Confident Not Confident



Consider Partnering with an OB/GYN or Women's Health Provider



Health care providers should develop a strong relationship and partner with an obstetrician/gynecologist or women's health care provider that can:



Counsel patients about contraception



Prescribe the full range of available contraceptive methods



Provide fitting/insertion, demonstration, and/or instruction on acceptable uses of contraceptives



The Mycophenolate Pregnancy Registry Lisa Coscia, RN, BSN, CCTC, FAST



Learning Objective

Monitor relevant pregnancies and encourage patient reporting to the Mycophenolate Pregnancy Registry.

Audience Response

If pregnancy occurs while using mycophenolate (or within 6 weeks of stopping it), what is the first step for patients to participate in the Registry?

- A. Stop mycophenolate immediately
- B. Inform healthcare provider
- C. Notify the registry by phone or secure email of pregnancy
- D. Request an informed consent form from the registry
- E. I'm not sure



Purpose of the Mycophenolate Pregnancy Registry

- Assess risks and outcomes
- Create a framework for education (clinicians, patients)
- Mitigate or eliminate exposures to mycophenolate in pregnancy



Steps for Patients to Participate in Registry

- 1. If a patient gets pregnant while taking mycophenolate or within 6 weeks of stopping it, they should inform their healthcare provider immediately
- 2. Once confirmed, and with permission of the patient, the healthcare provider will report the pregnancy to the Registry
- 3. The Registry will contact the patient after speaking with the healthcare provider
- An informed consent form which explains what to expect from the Registry including the patient's rights will be sent to the patient



Steps for Patients to Participate in Registry

- 5. Healthcare providers should offer to review the document with the patient to answer any questions
- Upon patient consent, the patient and healthcare provider provides information about the patient's health and the baby's health to the Registry



Providing Information to the Mycophenolate Pregnancy Registry

A patient's participation in the Registry does not require any additional healthcare provider visits, testing, or treatments beyond the regular medical care received from healthcare providers.



The Registry will contact the patient by her preferred method (eg, phone, email) and ask the patient (and also the healthcare provider) questions about both mother and baby at:



- About 3 months of pregnancy
- 2 more times over the next 6 months



 The mother's approximate due date



 When the baby is 2, 6, and 12 months old



Any information provided by the patient will be kept private and the patient may withdraw consent at any time and for any reason.



Reporting Eligible Pregnancies to the Mycophenolate Pregnancy Registry



When a healthcare provider reports an eligible pregnancy to the Mycophenolate Pregnancy Registry, they should provide contact information, information about the pregnancy, and the patient's contact information so that they can be called for follow-up for the safety study.



Provision of patient contact and medical information to the Mycophenolate Pregnancy Registry is covered by a HIPAA waiver.



Role of the Healthcare Provider After Patient Enrolls in the Registry



After enrolling a patient in the Registry, healthcare providers will be asked to provide pregnancy and outcomes data on a paper-based case report form (CRF) and submit it via mail or fax, or enter the data into electronic data capture (EDC) system.



The healthcare provider should keep Registry informed of any changes to contact information throughout participation.



Data Elements Collected from Patients Enrolled in the Mycophenolate Pregnancy Registry

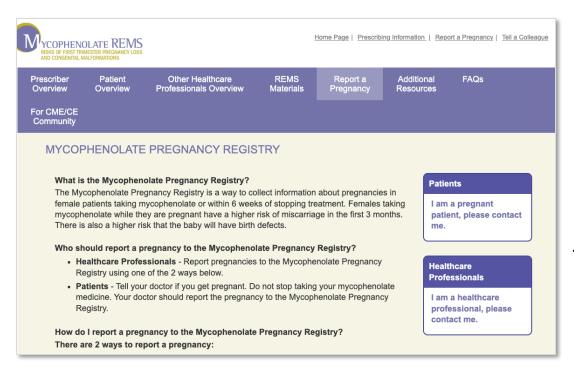
- Mycophenolate exposure, including dose and timing of exposure
- Maternal and fetal outcomes
- Root cause analysis (to assess that circumstances that led to the fetal exposure)



Frequency of educational counseling



Reporting a Pregnancy: Contact Info



Mycophenolate Pregnancy Registry

MycophenolateREMS.com 1.800.617.8191 (Call for mailing address)

PS-Mycophenolate Pregnancy Registry

PSMycophenolateREMS.com 1.877.310.4015 support@psmycophenolaterems.com

Transplant Pregnancy Registry International

transplantpregnancyregistry.org 1.877.955.6877 (toll-free) Outside of US: 215.599.2078 tpr@transplantpregnancyregistry.org



SMART Goals

Specific, Measurable, Attainable, Relevant, Timely

- Educate and remind! persons of reproductive potential about risk
- Engage in pregnancy prevention and planning, including:
 - Discussion of acceptable methods of contraception during mycophenolate treatment
 - Consideration of alternative immunosuppressants with less potential for embryofetal toxicity if pregnancy is desired
- Report to the Mycophenolate Pregnancy Registry any pregnancies that occur and encourage pregnant patients to participate in the Registry (also consider reporting to the TPRI for transplant recipients)
 - Support collection of evidence to improve understanding of REMS failure and enhance prevention of prenatal exposure to mycophenolate
- Read and share additional education resources:
 - Brochure for healthcare providers
 - Brochure for patients



Audience Response (Post-Activity)

What percentage of infants born to an individual exposed to mycophenolate during the first trimester of pregnancy are born with congenital abnormalities?

- A. ~10-15%
- B. ~20-25%
- C. ~45-50%
- D. More than 50%
- E. I'm not sure



Audience Response (Post-Activity)

What percent of pregnancies are unplanned?

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C. 40%

D. 54%

E. I'm not sure



Audience Response (Post-Activity)

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To Ask a Question

Please select the *Ask Question* tab below the slide viewer.

Please include the faculty member's name if a question is specifically for them.

Questions & Answers



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