

## HIGHLIGHTS OF PRESCRIBING INFORMATION

These highlights do not include all the information needed to use QSYMIA® safely and effectively. See full prescribing information for QSYMIA.

**QSYMIA (phentermine and topiramate extended-release capsules), for oral use, CIV**  
**Initial U.S. Approval: 2012**

### INDICATIONS AND USAGE

QSYMIA is a combination of phentermine, a sympathomimetic amine anorectic, and topiramate, indicated in combination with a reduced-calorie diet and increased physical activity to reduce excess body weight and maintain weight reduction long term in:

- Adults and pediatric patients aged 12 years and older with obesity (1)
- Adults with overweight in the presence of at least one weight-related comorbid condition

#### Limitations of Use:

- The effect of QSYMIA on cardiovascular morbidity and mortality has not been established (1).
- The safety and effectiveness of QSYMIA in combination with other products intended for weight loss, including prescription and over-the-counter drugs, and herbal preparations, have not been established (1).

### DOSAGE AND ADMINISTRATION

- Take orally once daily in morning. Avoid administration in evening to prevent insomnia (2.2).
- Recommended starting dosage is 3.75 mg/23 mg (phentermine mg/topiramate mg) daily for 14 days; then increase to 7.5 mg/46 mg daily (2.2).
- Escalate dosage based on weight loss in adults or BMI reduction in pediatric patients. See the Full Prescribing Information for details regarding discontinuation or dosage escalation (2.2).
- Gradually discontinue 15 mg/92 mg dosage to prevent possible seizure (2.3).
- Do not exceed 7.5 mg/46 mg dosage for patients with moderate or severe renal impairment or patients with moderate hepatic impairment (2.4, 2.5).

### DOSAGE FORMS AND STRENGTHS

Extended-release capsules: (phentermine mg/topiramate mg)

- 3.75 mg/23 mg (3)
- 7.5 mg/46 mg (3)
- 11.25 mg/69 mg (3)
- 15 mg/92 mg (3)

### CONTRAINDICATIONS

- Pregnancy (4)
- Glaucoma (4)
- Hyperthyroidism (4)
- Taking or within 14 days of stopping monoamine oxidase inhibitors (4)
- Known hypersensitivity to any component of QSYMIA or idiosyncrasy to sympathomimetic amines (4)

### WARNINGS AND PRECAUTIONS

- **Embryo-Fetal Toxicity:** Can cause fetal harm. In patients who can become pregnant, a negative pregnancy test is recommended before initiating

QSYMIA and monthly during therapy; advise use of effective contraception. QSYMIA is available through a limited program under a Risk Evaluation and Mitigation Strategy (REMS) (5.1).

- **Suicidal Behavior and Ideation:** Monitor for depression or suicidal thoughts. Discontinue QSYMIA if symptoms develop (5.2).
- **Risk of Ophthalmologic Adverse Reactions:** Acute myopia and secondary angle closure glaucoma have been reported. Immediately discontinue QSYMIA if symptoms develop. Consider QSYMIA discontinuation if visual field defects occur (5.3).
- **Mood and Sleep Disorders:** Consider dosage reduction or discontinuation for clinically significant or persistent mood or sleep disorder symptoms (5.4).
- **Cognitive Impairment:** May cause disturbances in attention or memory, or speech/language problems. Caution patients about operating automobiles or hazardous machinery when starting treatment (5.5).
- **Slowing of Linear Growth:** Consider dosage reduction or discontinuation if pediatric patients are not growing or gaining height as expected (5.6).
- **Metabolic Acidosis:** Measure electrolytes before and during treatment. If persistent metabolic acidosis develops, reduce dosage or discontinue QSYMIA (5.7).
- **Decrease in Renal Function:** Measure creatinine before and during treatment. For persistent creatinine elevations, reduce dosage or discontinue QSYMIA (5.8).
- **Serious Skin Reactions:** QSYMIA should be discontinued at the first sign of a rash, unless the rash is clearly not drug-related (5.13).

### ADVERSE REACTIONS

Most common adverse reactions in:

- Adults (incidence  $\geq$  5% and at least 1.5 times placebo) are: paraesthesia, dizziness, dysgeusia, insomnia, constipation, and dry mouth.
- Pediatric patients aged 12 years and older (incidence  $\geq$  4% and greater than placebo) are: depression, dizziness, arthralgia, pyrexia, influenza, and ligament sprain (6.1).

**To report SUSPECTED ADVERSE REACTIONS, contact VIVUS LLC, at 1-888-998-4887 or FDA at 1-800-FDA-1088 or [www.fda.gov/medwatch](http://www.fda.gov/medwatch).**

### DRUG INTERACTIONS

- **Oral Contraceptives:** Altered exposure of progestin and estrogen may cause irregular bleeding, but not increased risk of pregnancy. Advise patients not to discontinue oral contraceptives if spotting occurs (7).
- **CNS Depressants Including Alcohol:** May potentiate CNS depressant effects. Avoid excessive use of alcohol (7).
- **Non-potassium Sparing Diuretics:** May potentiate hypokalemia. Measure potassium before and during treatment (7).

### USE IN SPECIFIC POPULATIONS

- **Lactation:** Breastfeeding not recommended (8.2).

**See 17 for PATIENT COUNSELING INFORMATION and MEDICATION GUIDE**

**Revised: 09/2024**

## **FULL PRESCRIBING INFORMATION: CONTENTS\***

### **1 INDICATIONS AND USAGE**

### **2 DOSAGE AND ADMINISTRATION**

- 2.1 Recommended Testing Prior to Initiation of QSYMIA
- 2.2 Recommended Dosage and Administration
- 2.3 Discontinuation of QSYMIA 15 mg/92 mg
- 2.4 Recommended Dosage in Patients with Renal Impairment
- 2.5 Recommended Dosage in Patients with Hepatic Impairment

### **3 DOSAGE FORM AND STRENGTHS**

### **4 CONTRAINDICATIONS**

### **5 WARNINGS AND PRECAUTIONS**

- 5.1 Embryo-Fetal Toxicity
- 5.2 Suicidal Behavior and Ideation
- 5.3 Risk of Ophthalmological Adverse Reactions
- 5.4 Mood and Sleep Disorders
- 5.5 Cognitive Impairment
- 5.6 Slowing of Linear Growth
- 5.7 Metabolic Acidosis
- 5.8 Decrease in Renal Function
- 5.9 Risk of Seizures with Abrupt Withdrawal of QSYMIA
- 5.10 Kidney Stones
- 5.11 Oligohidrosis and Hyperthermia
- 5.12 Hypokalemia
- 5.13 Serious Skin Reactions
- 5.14 Allergic Reactions Due to Inactive Ingredient FD&C Yellow No. 5

### **6 ADVERSE REACTIONS**

- 6.1 Clinical Trials Experience
- 6.2 Postmarketing Experience

### **7 DRUG INTERACTIONS**

### **8 USE IN SPECIFIC POPULATIONS**

- 8.1 Pregnancy
- 8.2 Lactation
- 8.3 Females and Males of Reproductive Potential
- 8.4 Pediatric Use
- 8.5 Geriatric Use
- 8.6 Renal Impairment
- 8.7 Hepatic Impairment

### **9 DRUG ABUSE AND DEPENDENCE**

- 9.1 Controlled Substance
- 9.2 Abuse
- 9.3 Dependence

### **10 OVERDOSAGE**

### **11 DESCRIPTION**

### **12 CLINICAL PHARMACOLOGY**

- 12.1 Mechanism of Action
- 12.2 Pharmacodynamics
- 12.3 Pharmacokinetics

### **13 NONCLINICAL TOXICOLOGY**

- 13.1 Carcinogenesis, Mutagenesis, Impairment of Fertility

### **14 CLINICAL STUDIES**

### **16 HOW SUPPLIED/STORAGE AND HANDLING**

### **17 PATIENT COUNSELING INFORMATION**

\* Sections or subsections omitted from the full prescribing information are not listed

## FULL PRESCRIBING INFORMATION

### 1 INDICATIONS AND USAGE

QSYMIA is indicated in combination with a reduced-calorie diet and increased physical activity to reduce excess body weight and maintain weight reduction long term in:

- Adults and pediatric patients aged 12 years and older with obesity
- Adults with overweight in the presence of at least one weight-related comorbid condition

#### Limitations of Use

- The effect of QSYMIA on cardiovascular morbidity and mortality has not been established.
- The safety and effectiveness of QSYMIA in combination with other products intended for weight loss, including prescription drugs, over-the-counter drugs, and herbal preparations, have not been established.

### 2 DOSAGE AND ADMINISTRATION

#### 2.1 Recommended Testing Prior to and During Treatment with QSYMIA

Prior to QSYMIA initiation and during treatment with QSYMIA, the following is recommended:

- Obtain a negative pregnancy test before initiating QSYMIA in patients who can become pregnant and monthly during QSYMIA therapy. QSYMIA is contraindicated during pregnancy [see *Contraindications (4)*, *Warnings and Precautions (5.1)*, and *Use in Specific Populations (8.3)*].
- Obtain a blood chemistry profile that includes bicarbonate, creatinine, and potassium in all patients, and glucose in patients with type 2 diabetes mellitus on antidiabetic medication prior to initiating QSYMIA treatment and periodically during treatment [see *Warnings and Precautions (5.7, 5.8, 5.12)*].

#### 2.2 Recommended Dosage and Administration

The recommended dosage, titration, and administration of QSYMIA are as follows:

- Take QSYMIA orally once daily in the morning with or without food. Avoid administration of QSYMIA in the evening due to the possibility of insomnia.
- The recommended starting dosage of QSYMIA is one capsule (containing 3.75 mg of phentermine and 23 mg of topiramate) (3.75 mg/23 mg) taken orally once daily for 14 days; after 14 days increase to the recommended dosage of QSYMIA 7.5 mg/46 mg orally once daily.
- After 12 weeks of treatment with QSYMIA 7.5 mg/46 mg, evaluate weight loss for adults or BMI reduction for pediatric patients aged 12 years and older. If an adult patient has not lost at least 3% of baseline body weight or a pediatric patient has not experienced a reduction of at least 3% of baseline BMI, increase the dosage to QSYMIA 11.25 mg/69 mg orally once daily for 14 days; followed by an increase in the dosage to QSYMIA 15 mg/92 mg orally once daily.
- After 12 weeks of treatment with QSYMIA 15 mg/92 mg, evaluate weight loss for adults or BMI reduction for pediatric patients aged 12 years and older. If an adult patient has not lost at least 5% of baseline body weight or a pediatric patient has not experienced a reduction of at least 5% of baseline BMI, discontinue QSYMIA [see *Dosage and Administration (2.3)*], as it is unlikely that the patient will achieve and sustain clinically meaningful weight loss with continued treatment.
- Monitor the rate of weight loss in pediatric patients. If weight loss exceeds 2 lbs (0.9 kg)/week, consider dosage reduction.

### 2.3 Discontinuation of QSYMIA 15 mg/92 mg

Discontinue QSYMIA 15 mg/92 mg gradually by taking QSYMIA 15 mg/92 mg orally once daily every other day for at least 1 week prior to stopping treatment altogether, due to the possibility of precipitating a seizure [see *Warnings and Precautions (5.9)* and *Drug Abuse and Dependence (9.3)*].

### 2.4 Recommended Dosage in Patients with Renal Impairment

- The recommended dosage in patients with mild (CrCl greater or equal to 50 and less than 80 mL/min) renal impairment is the same as the recommended dosage for patients with normal renal function [see *Warnings and Precautions (5.9)*, *Use in Specific Populations (8.6)*, and *Clinical Pharmacology (12.3)*].
- In patients with severe [creatinine clearance (CrCl) less than 30 mL/min] or moderate (CrCl greater than or equal to 30 and less than 50 mL/min) renal impairment (CrCl calculated using the Cockcroft-Gault equation with actual body weight), the maximum recommended dosage is QSYMIA 7.5 mg/46 mg once daily.
- Avoid use of QSYMIA in patients with end-stage renal disease on dialysis.

### 2.5 Recommended Dosage in Patients with Hepatic Impairment

- The recommended dosage of QSYMIA in patients with mild hepatic impairment (Child-Pugh 5 - 6) is the same as the recommended dosage in patients with normal hepatic function [see *Use in Specific Populations (8.7)* and *Clinical Pharmacology (12.3)*].
- In patients with moderate hepatic impairment (Child-Pugh score 7 - 9), the maximum recommended dosage is QSYMIA 7.5 mg/46 mg orally once daily.
- Avoid use of QSYMIA in patients with severe hepatic impairment (Child-Pugh score 10 - 15).

## 3 DOSAGE FORMS AND STRENGTHS

QSYMIA extended-release capsules are available in four strengths (phentermine mg/topiramate mg):

- 3.75 mg/23 mg - purple cap imprinted with VIVUS and purple body imprinted with 3.75/23
- 7.5 mg/46 mg - purple cap imprinted with VIVUS and yellow body imprinted with 7.5/46
- 11.25 mg/69 mg - yellow cap imprinted with VIVUS and yellow body imprinted with 11.25/69
- 15 mg/92 mg - yellow cap imprinted with VIVUS and white body imprinted with 15/92

## 4 CONTRAINDICATIONS

QSYMIA is contraindicated in patients:

- Who are pregnant [see *Warnings and Precautions (5.1)* and *Use in Specific Populations (8.1)*]
- With glaucoma [see *Warnings and Precautions (5.3)*]
- With hyperthyroidism
- Taking or within 14 days of stopping a monoamine oxidase inhibitors [see *Drug Interactions (7)*]
- With known hypersensitivity to phentermine, topiramate or any of the excipients in QSYMIA, or idiosyncrasy to the sympathomimetic amines [see *Adverse Reactions (6.2)*].

## 5 WARNINGS AND PRECAUTIONS

### 5.1 Embryo-Fetal Toxicity

QSYMIA can cause fetal harm. Data from pregnancy registries and epidemiologic studies indicate that a fetus exposed to topiramate in the first trimester of pregnancy has an increased risk of major congenital malformations, including but not limited to cleft lip and/or cleft palate (oral clefts), and of being small for gestational age (SGA). When multiple species of pregnant animals received topiramate at clinically relevant doses, structural malformations, including craniofacial defects, and reduced fetal weights occurred in offspring. A negative pregnancy test is recommended before initiating QSYMIA treatment in patients who can become pregnant and monthly during QSYMIA therapy. Advise patients who can become pregnant of the potential risk to a fetus and to use effective contraception during QSYMIA therapy [*see Use in Specific Populations (8.1, 8.3)*].

#### QSYMIA Risk Evaluation and Mitigation Strategy (REMS)

Because of the teratogenic risk associated with QSYMIA therapy, QSYMIA is available through a limited program under the REMS. Under the QSYMIA REMS, only certified pharmacies may distribute QSYMIA. Further information is available at [www.QSYMIAREMS.com](http://www.QSYMIAREMS.com) or by telephone at 1-888-998-4887.

### 5.2 Suicidal Behavior and Ideation

Antiepileptic drugs (AEDs), including topiramate, increase the risk of suicidal thoughts or behavior in patients taking these drugs for any indication. Pooled analyses of 199 placebo-controlled clinical studies (monotherapy and adjunctive therapy, median treatment duration 12 weeks) of 11 different AEDs across several indications showed that patients randomized to one of the AEDs had approximately twice the risk (adjusted Relative Risk 1.8, 95% CI 1.2, 2.7) of suicidal thinking or behavior compared to patients randomized to placebo. The estimated incidence rate of suicidal behavior or ideation among 27,863 AED-treated patients was 0.43%, compared to 0.24% among 16,029 placebo-treated patients, representing an increase of approximately one case of suicidal thinking or behavior for every 530 patients treated. There were four suicides in AED-treated patients in the trials and none in placebo-treated patients, but the number is too small to allow any conclusion about AED effect on suicide. The increased risk of suicidal thoughts or behavior with AEDs was observed as early as 1 week after starting drug treatment with AEDs and persisted for the duration of treatment assessed. Because most trials included in the analysis did not extend beyond 24 weeks, the risk of suicidal thoughts or behavior beyond 24 weeks could not be assessed. The risk of suicidal thoughts or behavior was generally consistent among drugs in the data analyzed. The finding of increased risk with AEDs of varying mechanisms of action and across a range of indications suggests that the risk applies to all AEDs used for any indication. The risk did not vary substantially by age in the clinical trials analyzed.

In a QSYMIA clinical trial of pediatric patients aged 12 years and older, 1 (0.6%) of the 167 QSYMIA-treated patients reported suicidal ideation and behavior which required hospitalization. No placebo-treated patients reported suicidal behavior or ideation.

Monitor all patients for the emergence or worsening of depression, suicidal thoughts or behavior, and/or any unusual changes in mood or behavior. Discontinue QSYMIA in patients who experience suicidal thoughts or behaviors [*see Warnings and Precautions (5.9)*]. Avoid QSYMIA in patients with a history of suicidal attempts or active suicidal ideation.

### 5.3 Risk of Ophthalmologic Adverse Reactions

#### Acute Myopia and Secondary Angle Closure Glaucoma

A syndrome consisting of acute myopia associated with secondary angle closure glaucoma has been reported in patients treated with topiramate. Symptoms include acute onset of decreased visual acuity and/or ocular pain.

Ophthalmologic findings can include myopia, mydriasis, anterior chamber shallowing, ocular hyperemia (redness), choroidal detachments, retinal pigment epithelial detachments, macular striae, and increased intraocular pressure. This syndrome may be associated with supraciliary effusion resulting in anterior displacement of the lens and iris, with secondary angle closure glaucoma. Symptoms typically occur within 1 month of initiating treatment with topiramate but may occur at any time during therapy. In contrast to primary narrow angle glaucoma, which is rare under 40 years of age, secondary angle closure glaucoma associated with topiramate has been reported in pediatric patients as well as adults. The primary treatment to reverse symptoms is discontinuation of QSYMIA as rapidly as possible in consultation with the treating physician. Elevated intraocular pressure of any etiology, if left untreated, can lead to serious sequelae including permanent loss of vision.

### Visual Field Defects

Visual field defects (independent of elevated intraocular pressure) have been reported in clinical trials and in postmarketing experience in patients receiving topiramate. In clinical trials, most of these events were reversible after topiramate discontinuation. If visual problems occur at any time during treatment, consider discontinuing QSYMIA.

## **5.4 Mood and Sleep Disorders**

QSYMIA can cause mood disorders, including depression and anxiety, as well as insomnia. Patients with a history of depression may be at increased risk of recurrent depression or other mood disorders while taking QSYMIA [see [Adverse Reactions \(6.1\)](#)].

Consider dosage reduction or discontinuation of QSYMIA if clinically significant or persistent symptoms occur. Discontinue QSYMIA if patients have symptoms of suicidal ideation or behavior [see [Warnings and Precautions \(5.2\)](#)].

## **5.5 Cognitive Impairment**

QSYMIA can cause cognitive dysfunction (e.g., impairment of concentration/attention, difficulty with memory, and speech or language problems, particularly word-finding difficulties). Rapid titration or high initial doses of QSYMIA may be associated with higher rates of cognitive events such as attention, memory, and language/word-finding difficulties [see [Adverse Reactions \(6.1\)](#)]. The concomitant use of alcohol or central nervous system (CNS) depressant drugs with QSYMIA may potentiate CNS depression or other centrally mediated effects of these agents, such as dizziness, cognitive adverse reactions, drowsiness, light-headedness, impaired coordination, and somnolence.

Caution patients about operating hazardous machinery, including automobiles, until they are reasonably certain QSYMIA therapy does not affect them adversely. Caution patients against excessive alcohol intake while receiving QSYMIA.

If cognitive dysfunction persists, consider dosage reduction or discontinuation of QSYMIA [see [Warnings and Precautions \(5.9\)](#)].

## **5.6 Slowing of Linear Growth**

QSYMIA is associated with a reduction in height velocity (centimeters of height gained per year) in obese pediatric patients 12 to 17 years of age. In a 56-week study, average height increased from baseline in both QSYMIA- and placebo-treated patients; however, a lower height velocity of -1.3 to -1.4 cm/year was observed in QSYMIA-treated compared to placebo-treated patients. Monitor height velocity in pediatric patients treated with QSYMIA. Consider dosage reduction or discontinuation of QSYMIA if pediatric patients are not growing or gaining height as expected [see [Warnings and Precautions \(5.9\)](#)].

## 5.7 Metabolic Acidosis

Hyperchloremic, non-anion gap, metabolic acidosis (decreased serum bicarbonate below the normal reference range in the absence of chronic respiratory alkalosis) has been reported in patients treated with QSYMIA [see *Adverse Reactions (6.1)*]. Manifestations of acute or chronic metabolic acidosis may include hyperventilation, nonspecific symptoms such as fatigue and anorexia, or more severe sequelae including cardiac arrhythmias or stupor. Chronic, untreated metabolic acidosis may increase the risk for nephrolithiasis or nephrocalcinosis and may also result in osteomalacia (referred to as rickets in pediatric patients) and/or osteoporosis with an increased risk for fractures. Chronic metabolic acidosis in pediatric patients may also reduce growth rates, which may decrease the maximal height achieved.

Conditions or therapies that predispose to acidosis (i.e., renal disease, severe respiratory disorders, status epilepticus, diarrhea, surgery, or ketogenic diet) may be additive to the bicarbonate lowering effects of QSYMIA. Concomitant use of QSYMIA and a carbonic anhydrase inhibitor may increase the severity of metabolic acidosis and may also increase the risk of kidney stone formation [see *Warnings and Precautions (5.10)*]. Avoid use of QSYMIA with other carbonic anhydrase inhibitors. If concomitant use of QSYMIA with another carbonic anhydrase inhibitor is unavoidable, the patient should be monitored for the appearance or worsening of metabolic acidosis.

Measure electrolytes including serum bicarbonate prior to starting QSYMIA and during QSYMIA treatment. In QSYMIA clinical trials, the peak reduction in serum bicarbonate typically occurred within 4 weeks of titration to the assigned dose, and in most patients, there was a correction of bicarbonate by week 56, without any dosage reduction. However, if persistent metabolic acidosis develops while taking QSYMIA, reduce the dosage or discontinue QSYMIA [see *Warnings and Precautions (5.9)*].

## 5.8 Decrease in Renal Function

QSYMIA can cause an increase in serum creatinine that reflects a decrease in renal function (glomerular filtration rate). In clinical trials, peak increases in serum creatinine were observed after 4 to 8 weeks of treatment. On average, serum creatinine gradually declined but remained elevated over baseline creatinine values. The changes in serum creatinine (and measured GFR) with short-term (4-weeks) QSYMIA treatment appear reversible with treatment discontinuation, but the effect of chronic treatment on renal function is not known.

Measure serum creatinine prior to starting QSYMIA and during QSYMIA treatment. If persistent elevations in creatinine occur, reduce the dosage or discontinue QSYMIA [see *Warnings and Precautions (5.9)*, *Adverse Reactions (6.1)*, and *Clinical Pharmacology (12.2)*].

## 5.9 Risk of Seizures with Abrupt Withdrawal of QSYMIA

Abrupt withdrawal of topiramate has been associated with seizures in individuals without a history of seizures or epilepsy. In situations where immediate termination of QSYMIA is medically required, appropriate monitoring is recommended. Patients discontinuing QSYMIA 15 mg/92 mg should be gradually tapered to reduce the possibility of precipitating a seizure [see *Dosage and Administration (2.3)* and *Drug Abuse and Dependence (9.3)*].

## 5.10 Kidney Stones

QSYMIA has been associated with kidney stone formation [see *Adverse Reactions (6.1)*]. Topiramate inhibits carbonic anhydrase activity and promotes kidney stone formation by reducing urinary citrate excretion and increasing urine pH. Patients on a ketogenic diet may be at increased risk for kidney stone formation. An increase in urinary calcium and a marked decrease in urinary citrate was observed in topiramate-treated pediatric patients in a one-year, active-controlled study. Increased ratio of urinary calcium/citrate increases the risk of kidney stones and/or nephrocalcinosis.

Avoid the use of QSYMIA with other drugs that inhibit carbonic anhydrase [see [Drug Interactions \(7\)](#)]. Advise patients to increase fluid intake (to increase urinary output), which may decrease the concentration of substances involved in kidney stone formation.

### 5.11 Oligohidrosis and Hyperthermia

Oligohidrosis (decreased sweating), infrequently resulting in hospitalization, has been reported in association with the use of topiramate. Decreased sweating and an elevation in body temperature above normal characterized these cases. Some of the cases have been reported with topiramate after exposure to elevated environmental temperatures.

The majority of the reports associated with topiramate have been in pediatric patients. Advise all patients and caregivers to monitor for decreased sweating and increased body temperature during physical activity, especially in hot weather. Patients on concomitant medications that predispose them to heat-related disorders may be at increased risk.

### 5.12 Hypokalemia

QSYMIA can increase the risk of hypokalemia through its inhibition of carbonic anhydrase activity. In addition, when QSYMIA is used in conjunction with non-potassium sparing diuretics this may further potentiate potassium-wasting. Measure potassium before and during treatment with QSYMIA [see [Adverse Reactions \(6.1\)](#), [Drug Interactions \(7\)](#), and [Clinical Pharmacology \(12.3\)](#)].

### 5.13 Serious Skin Reactions

Serious skin reactions (Stevens-Johnson Syndrome [SJS] and Toxic Epidermal Necrolysis [TEN]) have been reported in patients receiving topiramate. QSYMIA should be discontinued at the first sign of a rash, unless the rash is clearly not drug-related. If signs or symptoms suggest SJS/TEN, use of this drug should not be resumed, and alternative therapy should be considered. Inform patients about the signs of serious skin reactions.

### 5.14 Allergic Reactions Due to Inactive Ingredient FD&C Yellow No. 5

This product contains FD&C Yellow No. 5 (tartrazine) which may cause allergic-type reactions (including bronchial asthma) in certain susceptible persons. Although the overall incidence of FD&C Yellow No. 5 (tartrazine) sensitivity in the general population is low, it is frequently seen in patients who also have aspirin hypersensitivity.

## 6 ADVERSE REACTIONS

The following clinically significant adverse reactions are described elsewhere in the labeling:

- Embryo-Fetal Toxicity [see [Warnings and Precautions \(5.1\)](#) and [Use in Specific Populations \(8.1, 8.6\)](#)]
- Suicidal Behavior and Ideation [see [Warnings and Precautions \(5.2\)](#)]
- Risk of Ophthalmologic Adverse Reactions [see [Warnings and Precautions \(5.3\)](#)]
- Mood and Sleep Disorders [see [Warnings and Precautions \(5.4\)](#)]
- Cognitive Impairment [see [Warnings and Precautions \(5.5\)](#)]
- Slowing of Linear Growth [see [Warnings and Precautions \(5.6\)](#)]
- Metabolic Acidosis [see [Warnings and Precautions \(5.7\)](#)]
- Decrease in Renal Function [see [Warnings and Precautions \(5.8\)](#)]
- Risk of Seizures with Abrupt Withdrawal of QSYMIA [see [Warnings and Precautions \(5.9\)](#)]
- Kidney Stones [see [Warnings and Precautions \(5.10\)](#)]
- Oligohidrosis and Hyperthermia [see [Warnings and Precautions \(5.11\)](#)]
- Hypokalemia [see [Warnings and Precautions \(5.12\)](#)]

- Serious Skin Reactions [*see Warnings and Precautions (5.13)*]

## 6.1 Clinical Trials Experience

Because clinical trials are conducted under widely varying conditions, adverse reaction rates observed in the clinical trials of a drug cannot be directly compared to rates in the clinical studies of another drug and may not reflect the rates observed in practice.

The data described herein reflect exposure to QSYMIA in two 1-year, randomized, double-blind, placebo-controlled, multicenter clinical trials and two supportive trials in 2,318 adult patients with overweight or obesity [936 (40%) patients with hypertension, 309 (13%) patients with type 2 diabetes mellitus, 808 (35%) patients with BMI greater than 40 kg/m<sup>2</sup>] exposed for a mean duration of 298 days. Data in this section also describe adverse reactions from a 1-year, randomized, double-blind, placebo-controlled multicenter clinical trial that evaluated 223 pediatric patients (12 to 17 years old) with obesity [*see Clinical Studies (14)*].

### Adults

Adverse reactions occurring at greater than or equal to 5% and at least 1.5 times placebo in adults include paraesthesia, dizziness, dysgeusia, insomnia, constipation, and dry mouth.

Adverse reactions reported in greater than or equal to 2% of QSYMIA-treated adults and more frequently than in the placebo group are shown in [Table 1](#).

**Table 1. Adverse Reactions Reported in  $\geq 2\%$  of QSYMIA-Treated Adults with Overweight or Obesity and More Frequently than Placebo in Overall Study Population of 1 Year Duration**

<b>Adverse Reaction</b>	<b>Placebo (N = 1561) %</b>	<b>QSYMIA 3.75 mg/23 mg (N = 240) %</b>	<b>QSYMIA 7.5 mg/46 mg (N = 498) %</b>	<b>QSYMIA 15 mg/92 mg (N = 1,580) %</b>
Paraesthesia	2	4	14	20
Dry Mouth	3	7	14	19
Constipation	6	8	15	16
Upper Respiratory Tract Infection	13	16	12	14
Headache	9	10	7	11
Dysgeusia	1	1	7	9
Insomnia	5	5	6	9
Nasopharyngitis	8	13	11	9
Dizziness	3	3	7	9
Sinusitis	6	8	7	8
Nausea	4	6	4	7
Back Pain	5	5	6	7
Fatigue	4	5	4	6
Diarrhea	5	5	6	6
Vision Blurred	4	6	4	5
Bronchitis	4	7	4	5
Urinary Tract Infection	4	3	5	5
Cough	4	3	4	5
Influenza	4	8	5	4
Depression	2	3	3	4
Anxiety	2	3	2	4
Hypoesthesia	1	1	4	4
Irritability	1	2	3	4
Alopecia	1	2	3	4
Disturbance in Attention	1	0	2	4
Pain in Extremity	3	2	3	3
Muscle Spasms	2	3	3	3
Dyspepsia	2	2	2	3
Gastroesophageal Reflux Disease	1	1	3	3
Rash	2	2	2	3
Hypokalemia	0	0	1	3
Dry Eye	1	1	1	3
Gastroenteritis	2	1	2	3
Pharyngolaryngeal Pain	2	3	1	2
Paraesthesia Oral	0	0	1	2
Eye Pain	1	2	2	2
Nasal Congestion	1	2	1	2
Thirst	1	2	2	2
Sinus Congestion	2	3	3	2
Procedural Pain	2	2	2	2
Palpitations	1	1	2	2
Musculoskeletal Pain	1	1	3	2
Decreased Appetite	1	2	2	2
Neck Pain	1	1	2	1
Dysmenorrhea	0	2	0	1
Chest Discomfort	0	2	0	1

## Pediatric Patients Aged 12 Years and Older

Adverse reactions occurring in pediatric patients treated with either QSYMIA 15 mg/92 mg or QSYMIA 7.5 mg/46 mg at greater than or equal to 4% and higher than placebo include depression, pyrexia, dizziness, arthralgia, influenza, and ligament sprain.

Adverse reactions reported in greater than or equal to 2% of QSYMIA-treated pediatric patients and more frequently than in the placebo group from a study in pediatric patients aged 12 years and older are shown in [Table 2](#).

**Table 2. Adverse Reactions Reported in  $\geq 2\%$  of QSYMIA-Treated Pediatric Patients Aged 12 to 17 Years and More Frequently than Placebo during 56 Weeks of Treatment**

Adverse Reaction	Placebo (N = 56) %	QSYMIA 7.5 mg/46 mg (N = 54) %	QSYMIA 15 mg/92 mg (N = 113) %
Depression	0	2	4
Nausea	4	4	4
Pyrexia	2	2	4
Dizziness	0	2	4
Arthralgia	0	2	4
Paraesthesia	0	2	3
Anxiety	0	2	3
Abdominal Pain Upper	0	0	3
Fatigue	2	0	3
Ear Infection	0	2	3
Musculoskeletal Chest Pain	0	0	3
Influenza	0	4	2
Ligament Sprain	0	4	2

## Increase in Heart Rate

In adult and pediatric clinical trials, there was a higher incidence of heart rate elevations observed in QSYMIA-treated compared to placebo-treated patients. In an 8-week ambulatory blood pressure monitoring (ABPM) study in adults, QSYMIA increased the 24-hr average heart rate by 3.6 beats per minute (bpm) (95% CI 2.1, 5.2) compared to the placebo group [see *Clinical Pharmacology (12.2)*].

In clinical trials, a higher percentage of QSYMIA-treated adults and pediatric patients aged 12 years and older experienced heart rate increases from baseline of more than 5, 10, 15, and 20 bpm compared to placebo-treated patients. [Table 3](#) and [Table 4](#) provide the numbers and percentages of adult and pediatric patients, respectively, with elevations in heart rate in clinical studies of up to one year.

**Table 3. Number and Percentage of Adults with Overweight or Obesity with an Increase in Heart Rate at a Single Time Point from Baseline**

	Placebo N=1561 n (%)	QSYMIA 3.75 mg/23 mg N=240 n (%)	QSYMIA 7.5 mg/46 mg N=498 n (%)	QSYMIA 15 mg/92 mg N=1580 n (%)
Greater than 5 bpm	1021 (65.4)	168 (70.0)	372 (74.7)	1228 (77.7)
Greater than 10 bpm	657 (42.1)	120 (50.0)	251 (50.4)	887 (56.1)
Greater than 15 bpm	410 (26.3)	79 (32.9)	165 (33.1)	590 (37.3)
Greater than 20 bpm	186 (11.9)	36 (15.0)	67 (13.5)	309 (19.6)

**Table 4. Number and Percentage of Pediatric Patients with an Increase in Heart Rate at a Single Time Point from Baseline**

	<b>Placebo N=56 n (%)</b>	<b>QSYMIA 7.5 mg/46 mg N=54 n (%)</b>	<b>QSYMIA 15 mg/92 mg N=113 n (%)</b>
Greater than 5 bpm	37 (66.1)	38 (70.4)	92 (81.4)
Greater than 10 bpm	26 (46.4)	30 (55.6)	73 (64.6)
Greater than 15 bpm	17 (30.4)	18 (33.3)	48 (42.5)
Greater than 20 bpm	10 (17.9)	10 (18.5)	27 (23.9)

### Paraesthesia/Dysgeusia

In adult clinical trials, reports of paraesthesia, characterized as tingling in hands, feet, or face, and dysgeusia, characterized as a metallic taste, occurred (see [Table 1](#)). Adverse reactions of paraesthesia were also reported in pediatric patients (see [Table 2](#)). QSYMIA-treated adult patients discontinued treatment due to these adverse reactions (1% for paraesthesia and 0.6% for dysgeusia); no pediatric patients discontinued treatment due to paraesthesia or dysgeusia.

### Mood and Sleep Disorders

The proportion of adult patients in 1-year controlled trials of QSYMIA reporting one or more adverse reactions related to mood and sleep disorders was 15% and 21% with QSYMIA 7.5 mg/46 mg and 15 mg/92 mg, respectively, compared to 10% with placebo. These events were further categorized into sleep disorders, anxiety, and depression. Reports of sleep disorders were typically characterized as insomnia and occurred in 8.1% and 11% of patients treated with QSYMIA 7.5 mg/46 mg and 15 mg/92 mg, respectively, compared to 5.8% of patients treated with placebo. Reports of anxiety occurred in 4.8% and 7.9% of patients treated with QSYMIA 7.5 mg/46 mg and 15 mg/92 mg, respectively, compared to 2.6% of patients treated with placebo. Reports of depression/mood problems occurred in 3.8% and 7.6% of patients treated with QSYMIA 7.5 mg/46 mg and 15 mg/92 mg, respectively, compared to 3.4% of patients treated with placebo. Mood and sleep disorder adverse reactions occurred in patients with and without a history of depression.

In a pediatric clinical trial, higher proportions of QSYMIA-treated patients reported one or more adverse reactions related to mood (e.g., depression, anxiety) and sleep disorders (e.g., insomnia) compared to placebo-treated patients (see [Table 2](#)).

### Cognitive Disorders

In the 1-year controlled trials of QSYMIA in adults, the proportion of patients who experienced one or more cognitive-related adverse reactions was 5.0% for QSYMIA 7.5 mg/46 mg and 7.6% for QSYMIA 15 mg/92 mg, compared to 1.5% for placebo. These adverse reactions were comprised primarily of reports of problems with attention/concentration, memory, and language (word-finding). These events occurred at any time during treatment with QSYMIA.

### Slowing of Linear Growth

QSYMIA is associated with a reduction in height velocity (centimeters of height gained per year) in obese pediatric patients 12 to 17 years of age. In a 56-week study, average height increased from baseline in both QSYMIA- and placebo-treated patients; however, a lower height velocity of -1.3 to -1.4 cm/year was observed in QSYMIA-treated compared to placebo-treated patients.

### Decrease in Bone Mineral Density

QSYMIA is associated with less bone mineral acquisition in pediatric patients 12 to 17 years of age. In a substudy (n=66) evaluating bone mineralization via dual-energy X-ray absorptiometry (DEXA), increases in bone mineral density (BMD) at the lumbar spine and total body less head (TBLH) were smaller in pediatric patients treated with QSYMIA compared to those treated with placebo after 1 year of treatment. Declines in BMD Z-scores of -0.5 or greater from baseline for TBLH were observed in 9% of QSYMIA 7.5 mg/46 mg-treated patients and 30% of QSYMIA 15 mg/92 mg-treated patients, compared to 0% of placebo-treated patients. The sample size and study duration were too small to determine if fracture risk is increased. Decreased BMD was not correlated with decreased serum bicarbonate, which commonly occurs with QSYMIA treatment, or changes in body weight. No patient had a BMD Z-score that went below -2.0 during the trial. Similar findings were observed in a 1 year, active-controlled trial of topiramate in pediatric patients with another condition.

### Nephrolithiasis

In the 1-year controlled trials of QSYMIA in adults, the incidence of nephrolithiasis was 0.2% for QSYMIA 7.5 mg/46 mg and 1.2% for QSYMIA 15 mg/92 mg, compared to 0.3% for placebo.

### Laboratory Abnormalities

#### *Serum Bicarbonate*

In the 1-year controlled trials of QSYMIA in adults, the incidence of persistent decreases in serum bicarbonate below the normal range (levels of less than 21 mEq/L at 2 consecutive visits or at the final visit) was 6.4% for QSYMIA 7.5 mg/46 mg and 12.8% for QSYMIA 15 mg/92 mg, compared to 2.1% for placebo. The incidence of persistent, markedly low serum bicarbonate values (levels of less than 17 mEq/L on 2 consecutive visits or at the final visit) was 0.2% for QSYMIA 7.5 mg/46 mg dose and 0.7% for QSYMIA 15 mg/92 mg dose, compared to 0.1% for placebo. In a pediatric clinical trial, 60 to 70% QSYMIA-treated patients had a persistent bicarbonate level below the normal range (<21 mEq/L) compared to 43% of placebo-treated patients.

#### *Serum Potassium*

In the 1-year controlled trials of QSYMIA in adults, the incidence of persistent low serum potassium values (less than 3.5 mEq/L at two consecutive visits or at the final visit) during the trial was 3.6% for QSYMIA 7.5 mg/46 mg dose and 4.9% for QSYMIA 15 mg/92 mg, compared to 1.1% for placebo. Of the subjects who experienced persistent low serum potassium, 88% were receiving treatment with a non-potassium sparing diuretic.

The incidence of markedly low serum potassium (less than 3 mEq/L, and a reduction from pre-treatment of greater than 0.5 mEq/L) at any time during the trial was 0.2% for QSYMIA 7.5 mg/46 mg dose and 0.7% for QSYMIA 15 mg/92 mg dose, compared to 0.0% for placebo. Persistent markedly low serum potassium (less than 3 mEq/L, and a reduction from pre-treatment of greater than 0.5 mEq/L at two consecutive visits or at the final visit) occurred in 0.2% receiving QSYMIA 7.5 mg/46 mg dose and 0.1% receiving QSYMIA 15 mg/92 mg dose, compared to 0.0% receiving placebo.

Low serum potassium levels (<3.5 mEq/L) were not observed in a 56-week clinical trial of pediatric patients with obesity.

#### *Serum Creatinine*

In the 1-year controlled trials of QSYMIA in adults and pediatric patients, there was an increase in serum creatinine from baseline, peaking between Week 4 to 8 in adults and at Week 16 in pediatric patients. Serum creatinine values declined but remained elevated over baseline over 1 year of treatment. The incidence of increases in serum creatinine of greater than or equal to 0.3 mg/dL at any time during treatment in adults was 7.2% for QSYMIA 7.5 mg/46 mg and 8.4% for QSYMIA 15 mg/92 mg, compared to 2.0% for placebo; 17% of

pediatric patients treated with QSYMIA 7.5 mg/46 mg or QSYMIA 15 mg/92 mg and 0% of patients treated with placebo had a serum creatinine  $\geq 0.3$  mg/dL at any time post-randomization. Increases in serum creatinine of greater than or equal to 50% over baseline occurred in 2.0% of adult subjects receiving QSYMIA 7.5 mg/46 mg and 2.8% receiving QSYMIA 15 mg/92 mg, compared to 0.6% receiving placebo.

### *Serum Ammonia*

Hyperammonemia with or without encephalopathy has been reported with topiramate. The risk for hyperammonemia with topiramate appears dose related and has been reported more frequently when concomitantly used with valproic acid [see [Drug Interactions \(7\)](#)].

The incidence of hyperammonemia in pediatric patients 12 to 17 years of age in clinical trials of another condition was 26% in patients taking topiramate at 100 mg/day (1.1 times the maximum recommended dosage of QSYMIA) and 14% in patients taking topiramate at 50 mg/day (0.6 times the maximum recommended dosage of QSYMIA), compared to 9% in patients taking placebo. There was also an increased incidence of markedly increased hyperammonemia (defined as 50% above the upper limit of normal reference range) at the 100 mg dose.

## **6.2 Postmarketing Experience**

The following adverse reactions have been reported during post approval use of QSYMIA, phentermine, and topiramate. Because these reactions are reported voluntarily from a population of uncertain size it is not always possible to reliably estimate their frequency or establish a causal relationship to drug exposure.

### QSYMIA

*Psychiatric:* suicidal ideation, suicidal behavior

*Ophthalmic:* acute angle closure glaucoma, increased intraocular pressure

### Phentermine

*Allergic Reactions:* urticaria

*Cardiovascular:* elevation of blood pressure, ischemic events

*Central Nervous System:* euphoria, psychosis, tremor

*Reproductive:* changes in libido, impotence

### Topiramate

*Dermatologic:* bullous skin reactions (including erythema multiforme, Stevens-Johnson syndrome, toxic epidermal necrolysis), pemphigus

*Gastrointestinal:* pancreatitis

*Hepatic:* hepatic failure (including fatalities), hepatitis

*Metabolic:* hyperammonemia with or without encephalopathy has been reported with concomitant valproic acid [see [Drug Interactions \(7\)](#)], hypothermia

*Ophthalmic:* maculopathy

## **7 DRUG INTERACTIONS**

[Table 5](#) displays clinically significant drug interactions with QSYMIA.

**Table 5. Clinically Significant Drug Interactions with QSYMIA**

<b>Monoamine Oxidase Inhibitors</b>	
<i>Clinical Impact</i>	Concomitant use of phentermine with monoamine oxidase inhibitors (MAOIs) increases the risk of hypertensive crisis.
<i>Intervention</i>	Concomitant use of QSYMIA is contraindicated during MAOI treatment and within 14 days of stopping an MAOI.
<b>Oral Contraceptives</b>	
<i>Clinical Impact</i>	Co-administration of multiple-dose QSYMIA 15 mg/92 mg once daily with a single dose of oral contraceptive containing 35 µg ethinyl estradiol (estrogen component) and 1 mg norethindrone (progestin component), in obese otherwise healthy volunteers, decreased the exposure of ethinyl estradiol by 16% and increased the exposure of norethindrone by 22% [see <a href="#">Clinical Pharmacology (12.3)</a> ]. Although this interaction is not anticipated to increase the risk of pregnancy, irregular bleeding (spotting) may occur more frequently due to both the increased exposure to the progestin and lower exposure to the estrogen, which tends to stabilize the endometrium.
<i>Intervention</i>	Inform patients not to discontinue their combination oral contraceptive if spotting occurs, but to notify their health care provider if the spotting is troubling to them.
<b>CNS Depressants Including Alcohol</b>	
<i>Clinical Impact</i>	The concomitant use of alcohol or CNS depressant drugs (e.g., barbiturates, benzodiazepines, and sleep medications) with phentermine or topiramate may potentiate CNS depression such as dizziness or cognitive adverse reactions, or other centrally mediated effects of these agents.
<i>Intervention</i>	Advise patients not to drive or operate machinery until they have gained sufficient experience on QSYMIA to gauge whether it adversely affects their mental performance, motor performance, and/or vision. Caution patients against excessive alcohol intake when taking QSYMIA. Consider QSYMIA dosage reduction or discontinuation if cognitive dysfunction persists [see <a href="#">Warnings and Precautions (5.5)</a> ]
<b>Non-Potassium Sparing Diuretics</b>	
<i>Clinical Impact</i>	Concurrent use of QSYMIA with non-potassium sparing diuretics may potentiate the potassium-wasting action of these diuretics. Concomitant administration of hydrochlorothiazide alone with topiramate alone has been shown to increase the C <sub>max</sub> and AUC of topiramate by 27% and 29%, respectively.
<i>Intervention</i>	When QSYMIA is used concomitantly with non-potassium-sparing diuretics, measure potassium before and during QSYMIA treatment [see <a href="#">Warnings and Precautions (5.12)</a> and <a href="#">Clinical Pharmacology (12.3)</a> ].
<b>Antiepileptic Drugs</b>	
<i>Clinical Impact</i>	Concomitant administration of phenytoin or carbamazepine with topiramate in patients with epilepsy, decreased plasma concentrations of topiramate by 48% and 40%, respectively, when compared to topiramate given alone [see <a href="#">Clinical Pharmacology (12.3)</a> ]. Concomitant administration of valproic acid and topiramate has been associated with hyperammonemia with and without encephalopathy. Concomitant administration of topiramate with valproic acid in patients has also been associated with hypothermia (with and without hyperammonemia).

<i>Intervention</i>	Consider measuring blood ammonia in patients in whom the onset of hypothermia or encephalopathy has been reported [see <i>Clinical Pharmacology (12.3)</i> ].
<b>Carbonic Anhydrase Inhibitors</b>	
<i>Clinical Impact</i>	Concomitant use of topiramate with any other carbonic anhydrase inhibitor may increase the severity of metabolic acidosis and may also increase the risk of kidney stone formation.
<i>Intervention</i>	Avoid the use of QSYMIA with other drugs that inhibit carbonic anhydrase. If concomitant use of QSYMIA with another carbonic anhydrase inhibitor is unavoidable, monitor patient for the appearance or worsening of metabolic acidosis [see <i>Warnings and Precautions (5.7, 5.10)</i> ].
<b>Pioglitazone</b>	
<i>Clinical Impact</i>	A decrease in the exposure of pioglitazone and its active metabolites were noted with the concurrent use of pioglitazone and topiramate in a clinical trial. The clinical relevance of these observations is unknown.
<i>Intervention</i>	Consider increased glycemic monitoring when using pioglitazone and QSYMIA concomitantly [see <i>Clinical Pharmacology (12.3)</i> ].
<b>Amitriptyline</b>	
<i>Clinical Impact</i>	Some patients may experience a large increase in amitriptyline concentration in the presence of topiramate.
<i>Intervention</i>	Any adjustments in amitriptyline dose when used with QSYMIA should be made according to the patient's clinical response and not on the basis of amitriptyline levels [see <i>Clinical Pharmacology (12.3)</i> ].

## 8 USE IN SPECIFIC POPULATIONS

### 8.1 Pregnancy

#### Risk Summary

QSYMIA is contraindicated in pregnant patients. The use of QSYMIA can cause fetal harm, and weight loss offers no clear clinical benefit to a pregnant patient (see *Clinical Considerations*). Available data from pregnancy registries and epidemiologic studies indicate an increased risk of major congenital malformations, including but not limited to cleft lip and/or cleft palate (oral clefts), and of being SGA in infants exposed *in utero* to topiramate (see *Data*). When phentermine and topiramate were co-administered to rats at doses of 3.75 and 25 mg/kg, respectively [approximately 2 times the maximum recommended human dose (MRHD) based on area under the curve (AUC)], or at the same dose to rabbits (approximately 0.1 times and 1 time, respectively, the clinical exposures at the MRHD based on AUC), there were no drug-related malformations. However, structural malformations, including craniofacial defects and reduced fetal weights occurred in offspring of multiple species of pregnant animals administered topiramate at clinically relevant doses (see *Data*). Advise pregnant women of the potential risk to a fetus.

#### Clinical Considerations

##### *Disease Associated Maternal and/or Embryo/Fetal Risk*

Weight loss during pregnancy may result in fetal harm. Appropriate weight gain based on pre-pregnancy weight is currently recommended for all pregnant patients, including those who are already overweight or obese, due to

the obligatory weight gain that occurs in maternal tissues during pregnancy. Maternal obesity increases the risk for congenital malformations, including neural tube defects, cardiac malformations, oral clefts, and limb reduction defects.

### *Fetal/Neonatal Adverse Reactions*

QSYMIA can cause metabolic acidosis [see *Warnings and Precautions (5.7)*]. The effect of topiramate-induced metabolic acidosis has not been studied in pregnancy; however, metabolic acidosis in pregnancy (due to other causes) can cause decreased fetal growth, decreased fetal oxygenation, and fetal death, and may affect the fetus' ability to tolerate labor.

### Data

#### *Human Data*

Data evaluating the risk of major congenital malformations, oral clefts, and being SGA with topiramate exposure during pregnancy is available from the North American Antiepileptic Drug (NAAED) Pregnancy Registry and from several larger retrospective epidemiologic studies.

#### Major Congenital Malformations

The NAAED Pregnancy Registry indicates an increased risk of major congenital malformations, including but not limited to oral clefts in infants exposed to topiramate during the first trimester of pregnancy. Other than oral clefts, no specific pattern of major congenital malformations or grouping of major congenital malformation types were observed. In the NAAED pregnancy registry, when topiramate-exposed infants with only oral clefts were excluded, the prevalence of major congenital malformations (4.1%) was higher than that in infants exposed to a reference antiepileptic drug (AED) (1.8%) or in infants with mothers without epilepsy and without exposure to AEDs (1.1%).

#### Oral Clefts

In the NAAED Pregnancy Registry, the prevalence of oral clefts among topiramate-exposed infants (1.4%) was higher than the prevalence in infants exposed to a reference AED (0.3%) or the prevalence in infants with mothers without epilepsy and without exposure to AEDs (0.11%). It was also higher than the background prevalence in United States (0.17%) as estimated by the Centers for Disease Control and Prevention (CDC). The relative risk of oral clefts in topiramate-exposed pregnancies in the NAAED Pregnancy Registry was 12.5 (95% Confidence Interval [CI] 5.9-26.37) as compared to the risk in a background population of untreated women. The UK Epilepsy and Pregnancy Register reported a prevalence of oral clefts among infants exposed to topiramate monotherapy (3.2%) that was 16 times higher than the background rate in the UK (0.2%).

Larger retrospective epidemiology studies showed that topiramate monotherapy exposure in pregnancy is associated with an approximately two to five-fold increased risk of oral clefts. The FORTRESS study found an excess risk of 1.5 (95% CI = -1.1 to 4.1) oral cleft cases per 1,000 infants exposed to topiramate during the first trimester.

#### Small for Gestational Age

Data from the NAAED Pregnancy Registry and population-based birth registry cohort indicate that exposure to topiramate in utero is associated with an increased risk of SGA newborns (birth weight <10<sup>th</sup> percentile). In the NAAED Pregnancy Registry, 19.7% of topiramate-exposed newborns were SGA compared to 7.9% of newborns exposed to a reference AED and 5.4% of newborns of mothers without epilepsy and without AED exposure. In the medical Birth Registry of Norway, a population-based pregnancy registry, 25% of newborns in the topiramate monotherapy exposure group were SGA compared to 9% in the comparison group unexposed to AEDs. The long-term consequences of the SGA findings are not known.

## *Animal Data*

### Phentermine/Topiramate

Embryo-fetal development studies have been conducted in rats and rabbits with combination phentermine and topiramate treatment. Phentermine and topiramate co-administered to rats during the period of organogenesis (gestation day (GD) 6 through 17) caused reduced fetal body weights but did not cause fetal malformations at the maximum dose of 3.75 mg/kg phentermine and 25 mg/kg topiramate [approximately 2 times the maximum recommended human dose (MRHD) based on area under the curve (AUC) estimates for each active ingredient]. In a similar study in rabbits in which the same doses were administered from GD 6 through 18, no effects on embryo-fetal development were observed at approximately 0.1 times (phentermine) and 1 time (topiramate) clinical exposures at the MRHD based on AUC. Significantly lower maternal body weight gain was recorded at these doses in rats and rabbits.

A pre- and post-natal development study was conducted in rats with combination phentermine and topiramate treatment. There were no adverse maternal or offspring effects in rats treated throughout organogenesis and lactation with 1.5 mg/kg/day phentermine and 10 mg/kg/day topiramate (approximately 2- and 3-times clinical exposures at the MRHD, respectively, based on AUC). Treatment with higher doses of 11.25 mg/kg/day phentermine and 75 mg/kg/day topiramate (approximately 5 and 6 times maximum clinical doses based on AUC, respectively) caused reduced maternal body weight gain and offspring toxicity. Offspring effects included lower pup survival after birth, increased limb and tail malformations, reduced pup body weight and delayed growth, development, and sexual maturation without affecting learning, memory, or fertility and reproduction. The limb and tail malformations were consistent with results of animal studies conducted with topiramate alone.

### Phentermine

Animal reproduction studies have not been conducted with phentermine. Limited data from studies conducted with the phentermine/topiramate combination indicate that phentermine alone was not teratogenic but resulted in lower body weight and reduced survival of offspring in rats at 5-fold the MRHD of QSYMIA, based on AUC.

### Topiramate

Topiramate causes developmental toxicity, including teratogenicity, at clinically relevant doses in multiple animal species.

Developmental toxicity, including teratogenicity, occurred at clinically relevant doses in multiple animal species in which topiramate was administered during the period of organogenesis (GD 6 – 15 in rodents, GD 6 – 18 in rabbits). In these studies, fetal malformations (primarily craniofacial defects such as cleft palate), limb malformations (ectrodactyly, micromelia, and amelia), rib/vertebral column anomalies, and/or reduced fetal weights were observed at dosages  $\geq 20$  mg/kg in mice (approximately 2 times the MRHD of topiramate in QSYMIA 15 mg/92 mg on a mg/m<sup>2</sup> basis), 20 mg/kg in rats (2 times the MRHD of QSYMIA based on estimated AUC), and 35 mg/kg in rabbits (2 times the MRHD based on estimated AUC). When rats were administered topiramate from GD 15 through lactation day 20, reductions in pre- and/or post-weaning weights occurred at dosages  $\geq 2$  mg/kg (2 times the MRHD of QSYMIA based on estimated AUC).

## **8.2 Lactation**

### Risk Summary

Topiramate and phentermine are present in human milk. There are no data on the effects of topiramate and phentermine on milk production. Diarrhea and somnolence have been reported in breastfed infants with maternal use of topiramate. There are no data on the effects of phentermine in breastfed infants. Because of the

potential for serious adverse reactions, including changes in sleep, irritability, hypertension, vomiting, tremor, and weight loss in breastfed infants with maternal use of phentermine, advise patients that breastfeeding is not recommended during QSYMIA therapy.

### 8.3 Females and Males of Reproductive Potential

#### Pregnancy Testing

Pregnancy testing is recommended in patients who can become pregnant before initiating QSYMIA and monthly during QSYMIA therapy [see *Warnings and Precautions (5.1)* and *Use in Specific Populations (8.1)*].

#### Contraception

##### *Females*

QSYMIA can cause fetal harm when administered to a pregnant patient [see *Use in Specific Populations (8.1)*]. Advise patients who can become pregnant to use effective contraception during therapy with QSYMIA.

For patients taking combined oral contraceptives (COCs), use of QSYMIA may cause irregular bleeding [see *Drug Interactions (7)*]. Advise patients not to discontinue taking their COC and to contact their health care provider.

### 8.4 Pediatric Use

The safety and effectiveness of QSYMIA as an adjunct to a reduced-calorie diet and increased physical activity for weight reduction and long-term maintenance of body weight have been established in pediatric patients aged 12 years and older with obesity. Use of QSYMIA for this indication is supported by a 56-week, double-blind, placebo-controlled study in 223 pediatric patients aged 12 years and above, a pharmacokinetic study in pediatric patients, and studies in adults with obesity [see *Clinical Pharmacology (12.3)* and *Clinical Studies (14)*].

In a pediatric clinical trial, there was one episode of serious suicidal ideation in a QSYMIA-treated patient requiring hospitalization and pharmacologic treatment [see *Warnings and Precautions (5.2)*] more patients treated with QSYMIA versus placebo reported adverse reactions related to mood (e.g., depression, anxiety) and sleep disorders (e.g., insomnia) [see *Warnings and Precautions (5.4)*]. Increases in bone mineral density and linear growth were attenuated in QSYMIA- versus placebo-treated patients [see *Warnings and Precautions (5.6)*]. Serious adverse reactions seen in pediatric patients using topiramate include acute angle glaucoma, oligohidrosis and hyperthermia, metabolic acidosis, cognitive and neuropsychiatric reactions, hyperammonemia and encephalopathy, and kidney stones.

The safety and effectiveness of QSYMIA in pediatric patients below the age of 12 years have not been established.

### 8.5 Geriatric Use

In the QSYMIA clinical trials, a total of 254 (7%) of the patients were 65 to 69 years of age; no patients 70 years of age or older were enrolled.

Clinical studies of QSYMIA did not include sufficient numbers of patients aged 65 and over to determine whether they respond differently from younger patients. In general, dose selection for an elderly patient should be cautious, usually starting at the low end of the dosing range, reflecting the greater frequency of decreased hepatic, renal, or cardiac function, and of concomitant disease or other drug therapy.

## 8.6 Renal Impairment

Compared to healthy volunteers with normal renal function, patients with moderate and severe renal impairment as estimated by the Cockcroft-Gault equation had higher exposures to phentermine and topiramate.

The recommended dosage of QSYMIA in patients with mild renal impairment (CrCl greater or equal to 50 and less than 80 mL/min) is the same as the recommended dosage for patients with normal renal function.

In patients with moderate (CrCl greater than or equal to 30 to less than 50 mL/min) and severe (CrCl less than 30 mL/min) renal impairment, the maximum recommended dosage is QSYMIA 7.5 mg/46 mg once daily.

QSYMIA has not been studied in patients with end-stage renal disease on dialysis. Avoid QSYMIA in this patient population [see *Dosage and Administration (2.4)* and *Clinical Pharmacology (12.3)*].

## 8.7 Hepatic Impairment

In patients with mild (Child-Pugh 5 - 6) and moderate (Child-Pugh 7 - 9) hepatic impairment, exposure to phentermine was higher compared to healthy volunteers with normal hepatic function. Exposure to topiramate was similar among patients with mild and moderate hepatic impairment and healthy volunteers.

The recommended dosage of QSYMIA in patients with mild hepatic impairment (Child-Pugh 5 - 6) is the same as the recommended dosage in patients with normal hepatic function.

In patients with moderate hepatic impairment, the maximum recommended dosage is QSYMIA 7.5 mg/46 mg once daily.

QSYMIA has not been studied in patients with severe hepatic impairment (Child-Pugh score 10 - 15). Avoid QSYMIA in this patient population [see *Dosage and Administration (2.5)* and *Clinical Pharmacology (12.3)*].

## 9 DRUG ABUSE AND DEPENDENCE

### 9.1 Controlled Substance

QSYMIA contains phentermine, a Schedule IV controlled substance, and topiramate, which is not a controlled substance.

### 9.2 Abuse

Phentermine has a known potential for abuse. Abuse is the intentional, non-therapeutic use of a drug, even once, for its desirable psychological or physiological effects.

Phentermine is related chemically and pharmacologically to amphetamines. Amphetamines and other stimulant drugs have been extensively abused. Abuse of amphetamines and related drugs (e.g., phentermine) may be associated with impaired control over drug use and severe social dysfunction. There are reports of patients who have increased the dosage of these drugs to many times higher than recommended. Assess the risk of abuse prior to prescribing QSYMIA as part of a weight reduction and long-term maintenance of body weight program.

### 9.3 Dependence

Physical dependence may occur in patients treated with QSYMIA. Physical dependence is a state that develops as a result of physiological adaptation in response to repeated drug use, manifested by withdrawal signs and symptoms after abrupt discontinuation or a significant dose reduction of a drug.

The following adverse reactions have been associated with the abrupt discontinuation of the individual components of QSYMIA:

- For topiramate, abrupt discontinuation has been associated with seizures in patients without a history of seizures or epilepsy [see *Warnings and Precautions (5.9)*].
- For phentermine, abrupt discontinuation following prolonged high dosage administration results in extreme fatigue and mental depression; changes are also noted on a sleep electroencephalogram.

Thus, in situations where rapid withdrawal of QSYMIA is required, appropriate medical monitoring is recommended. Patients discontinuing QSYMIA 15 mg/92 mg should be gradually tapered to reduce the possibility of precipitating a seizure [see *Dosage and Administration (2.3)*].

## 10 OVERDOSAGE

In the event of a significant overdose with QSYMIA, if the ingestion is recent, the stomach should be emptied immediately by gastric lavage or by induction of emesis. Appropriate supportive treatment should be provided according to the patient's clinical signs and symptoms. In the event of an overdose of QSYMIA, consider contacting the Poison Help line (1-800-222-1222) or a medical toxicologist for additional overdose management recommendations.

Acute overdose of phentermine may be associated with restlessness, tremor, hyperreflexia, rapid respiration, confusion, aggressiveness, hallucinations, and panic states. Fatigue and depression usually follow the central stimulation. Cardiovascular effects include arrhythmia, hypertension or hypotension, and circulatory collapse. Gastrointestinal symptoms include nausea, vomiting, diarrhea, and abdominal cramps. Fatal poisoning usually terminates in convulsions and coma. Manifestations of chronic intoxication with anorectic drugs include severe dermatoses, marked insomnia, irritability, hyperactivity, and personality changes. A severe manifestation of chronic intoxication is psychosis, often clinically indistinguishable from schizophrenia.

Management of acute phentermine intoxication is largely symptomatic and includes lavage and sedation with a barbiturate. Acidification of the urine increases phentermine excretion. Intravenous phentolamine has been suggested for possible acute, severe hypertension, if this complicates phentermine overdose.

Topiramate overdose has resulted in severe metabolic acidosis. Other signs and symptoms include convulsions, drowsiness, speech disturbance, blurred vision, diplopia, impaired mentation, lethargy, abnormal coordination, stupor, hypotension, abdominal pain, agitation, dizziness, and depression. The clinical consequences were not severe in most cases, but deaths have been reported after overdoses involving topiramate. A patient who ingested a dose between 96 and 110 gm topiramate was admitted to hospital with coma lasting 20 to 24 hours followed by full recovery after 3 to 4 days.

Hemodialysis is an effective means of removing topiramate from the body.

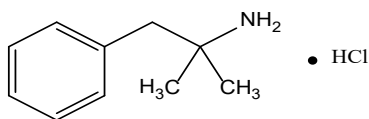
## 11 DESCRIPTION

QSYMIA extended-release capsules are comprised of immediate-release phentermine hydrochloride (expressed as the weight of the free base) and extended-release topiramate. QSYMIA contains phentermine hydrochloride, a sympathomimetic amine anorectic, and topiramate, a sulfamate-substituted monosaccharide.

### Phentermine Hydrochloride

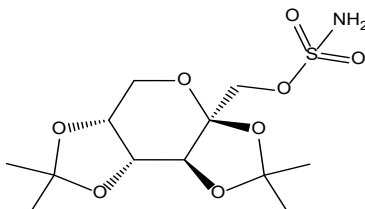
The chemical name of phentermine hydrochloride is  $\alpha,\alpha$ -dimethylphenethylamine hydrochloride. The molecular formula is  $C_{10}H_{15}N \cdot HCl$  and its molecular weight is 185.7 (hydrochloride salt) or 149.2 (free base).

Phentermine hydrochloride is a white, odorless, hygroscopic, crystalline powder that is soluble in water, methanol, and ethanol. Its structural formula is:



## Topiramate

Topiramate is 2,3:4,5-di-O-isopropylidene- $\beta$ -D-fructopyranose sulfamate. The molecular formula is  $C_{12}H_{21}NO_8S$  and its molecular weight is 339.4. Topiramate is a white to off-white crystalline powder with a bitter taste. It is freely soluble in methanol and acetone, sparingly soluble in pH 9 to pH 12 aqueous solutions and slightly soluble in pH 1 to pH 8 aqueous solutions. Its structural formula is:



## QSYMIA

QSYMIA (phentermine and topiramate extended-release capsules) is for oral administration and available in four dosage strengths:

- 3.75 mg/23 mg (phentermine 3.75 mg and topiramate 23 mg) (equivalent to 4.67 mg of Phentermine Hydrochloride USP).
- 7.5 mg/46 mg (phentermine 7.5 mg and topiramate 46 mg) (equivalent to 9.33 mg of Phentermine Hydrochloride USP).
- 11.25 mg/69 mg (phentermine 11.25 mg and topiramate 69 mg) (equivalent to 14.0 mg of Phentermine Hydrochloride USP).
- 15 mg/92 mg (phentermine 15 mg and topiramate 92 mg) (equivalent to 18.66 mg of Phentermine Hydrochloride USP).

Each capsule contains the following inactive ingredients: FD&C Blue #1, FD&C Red #3, FD&C Yellow #5 and #6, ethylcellulose, gelatin, methylcellulose, microcrystalline cellulose, povidone, starch, sucrose, talc, titanium dioxide, and pharmaceutical black and white inks.

## **12 CLINICAL PHARMACOLOGY**

### **12.1 Mechanism of Action**

Phentermine is a sympathomimetic amine with pharmacologic activity similar to the prototype drugs of this class used in obesity, amphetamine (d- and d/l-amphetamine). Drugs of this class used in obesity are commonly known as "anorectics" or "anorexigenics." The effect of phentermine on weight reduction and long-term maintenance of body weight is likely mediated by release of catecholamines in the hypothalamus, resulting in reduced appetite and decreased food consumption, but other metabolic effects may also be involved. The exact mechanism of action is not known.

The precise mechanism of action of topiramate on weight reduction and long-term maintenance of body weight is not known. Topiramate's effect on weight reduction and long-term maintenance of body weight may be due to its effects on both appetite suppression and satiety enhancement, induced by a combination of pharmacologic effects including augmenting the activity of the neurotransmitter gamma-aminobutyrate, modulation of voltage-

gated ion channels, inhibition of AOBMPA/kainite excitatory glutamate receptors, or inhibition of carbonic anhydrase.

## 12.2 Pharmacodynamics

Typical actions of amphetamines include central nervous system stimulation and elevation of blood pressure. Tachyphylaxis and tolerance have been demonstrated with drugs in this class.

### Cardiac Electrophysiology

The effect of QSYMIA on the QTc interval was evaluated in a randomized, double-blind, placebo- and active-controlled (400 mg moxifloxacin), and parallel group/crossover thorough QT/QTc study. A total of 54 healthy subjects were administered QSYMIA 7.5 mg/46 mg at steady state and then titrated to QSYMIA 22.5 mg/138 mg at steady state. QSYMIA 22.5 mg/138 mg [a supra-therapeutic dose resulting in a phentermine and topiramate maximum concentration ( $C_{max}$ ) of 4- and 3- times higher than those at QSYMIA 7.5 mg/46 mg, respectively] did not affect cardiac repolarization as measured by the change from baseline in QTc.

### Glomerular Filtration Rate (GFR)

Healthy obese males and females received QSYMIA daily for 4 weeks (3.75 mg/23 mg on Days 1 to 3, 7.5 mg/46 mg on Days 4 to 6, 11.25 mg/69 mg on Days 7 to 9, and 15 mg/92 mg on Days 10 to 28). The glomerular filtration rate (GFR) of these participants was assessed via iohexol clearance. On average, GFR decreased during QSYMIA treatment and returned to baseline within 4 weeks after discontinuing QSYMIA [see [Warnings and Precautions \(5.8\)](#)]

### Ambulatory Blood Pressure Monitoring

The effect of QSYMIA on blood pressure as measured by 24-hr ABPM was evaluated in a randomized, double-blind, 3-arm (QSYMIA, placebo, and active phentermine comparator) study of adults with obesity or overweight and at least one weight-related comorbidity. The study had a treatment duration of 8 weeks, and the primary endpoint was the change from baseline to Week 8 in mean systolic blood pressure (SBP) as measured by 24-hr ABPM.

QSYMIA 15 mg/92 mg did not demonstrate a pressor effect (see [Table 6](#)). At Week 8, placebo-adjusted mean (95% CI) treatment differences by 24-hr ABPM for QSYMIA 15 mg/92 mg were SBP -3.2 mmHg (-5.5, -0.9), DBP +1.2 mmHg (-0.2, +2.6), and heart rate (HR) +3.6 bpm (+2.1, +5.2). Placebo-adjusted mean weight loss was -3.9% (-4.9%, -3.0%) for QSYMIA 15 mg/92 mg and -3.8% (-4.7%, -2.9%) for phentermine 30 mg at Week 8.

**Table 6. Ambulatory Blood Pressure Monitoring Results in Adults with Obesity or Overweight Treated with QSYMIA, Placebo, or Phentermine - Change from Baseline and Treatment Difference from Placebo and Phentermine at Week 8**

APBM Measure	Change from Baseline			Treatment Difference		
	Placebo (n=130)	QSYMIA 15 mg/ 92 mg (n=122)	Phentermine 30 mg (n=133)	Qsymia – Placebo	Qsymia - Phentermine	Phentermine - Placebo
<b>SBP (mmHg)</b>						
Mean	-0.1	-3.3	+1.4	-3.2	-4.7	+1.5
(95% CI)	(-2.2, +1.9)	(-5.4, -1.2)	(-0.7, +3.4)	(-5.5, -0.9)	(-7.0, -2.5)	(-0.7, +3.7)
<b>DBP (mmHg)</b>						
Mean	-0.4	+0.8	+2.4	+1.2	-1.5	+2.7
(95% CI)	(-1.6, +0.9)	(-0.4, +2.1)	(+1.1, +3.6)	(-0.2, +2.6)	(-2.9, -0.2)	(+1.4, +4.1)
<b>HR (bpm)</b>						
Mean	-1.0	+2.6	+6.2	+3.6	-3.6	+7.2
(95% CI)	(-2.4, +0.4)	(+1.2, +4.0)	(+4.8, +7.6)	(+2.1, +5.2)	(-5.2, -2.1)	(+5.7, +8.8)

SBP=systolic blood pressure; DBP=diastolic blood pressure; HR=heart rate; BPM=beats per minute; ABPM=ambulatory blood pressure monitoring; CI=confidence interval  
An analysis of covariance (ANCOVA) model was used in the per protocol population (observed and single imputation data) to evaluate change from baseline and between-group differences.

### 12.3 Pharmacokinetics

#### Absorption

##### *Phentermine*

Upon oral administration of a single QSYMIA 15 mg/92 mg, the resulting mean plasma phentermine maximum concentration ( $C_{max}$ ), time to  $C_{max}$  ( $T_{max}$ ), area under the concentration curve from time zero to the last time with measurable concentration ( $AUC_{0-t}$ ), and area under the concentration curve from time zero to infinity ( $AUC_{0-\infty}$ ) are 49.1 ng/mL, 6 hr, 1990 ng·hr/mL, and 2000 ng·hr/mL, respectively. A high fat meal does not affect phentermine pharmacokinetics for QSYMIA 15 mg/92 mg. Phentermine pharmacokinetics are approximately dose-proportional from QSYMIA 3.75 mg/23 mg to phentermine 15 mg/topiramate 100 mg. Upon dosing phentermine 15 mg/topiramate 100 mg fixed dose combination capsule to steady state, the mean phentermine accumulation ratios for AUC and  $C_{max}$  are both approximately 2.5.

##### *Topiramate*

Upon oral administration of a single QSYMIA 15 mg/92 mg, the resulting mean plasma topiramate  $C_{max}$ ,  $T_{max}$ ,  $AUC_{0-t}$ , and  $AUC_{0-\infty}$ , are 1020 ng/mL, 9 hr, 61600 ng·hr/mL, and 68000 ng·hr/mL, respectively. A high fat meal does not affect topiramate pharmacokinetics for QSYMIA 15 mg/92 mg. Topiramate pharmacokinetics are approximately dose-proportional from QSYMIA 3.75 mg/23 mg to phentermine 15 mg/topiramate 100 mg. Upon dosing phentermine 15 mg/topiramate 100 mg fixed dose combination capsule to steady state, the mean topiramate accumulation ratios for AUC and  $C_{max}$  are both approximately 4.0.

#### Distribution

##### *Phentermine*

Phentermine is 17.5% plasma protein bound. The estimated phentermine apparent volume of distribution ( $V_d/F$ ) is 348 L via population pharmacokinetic analysis.

## *Topiramate*

Topiramate is 15 - 41% plasma protein bound over the blood concentration range of 0.5 to 250 µg/mL. The fraction bound decreased as blood topiramate increased. The estimated topiramate  $V_c/F$  (volume of the central compartment), and  $V_p/F$  (volume of the peripheral compartment) are 50.8 L, and 13.1 L, respectively, via population pharmacokinetic analysis.

## Elimination

### *Metabolism and Excretion*

## Phentermine

Phentermine has two metabolic pathways, namely p-hydroxylation on the aromatic ring and N-oxidation on the aliphatic side chain. Cytochrome P450 (CYP) 3A4 primarily metabolizes phentermine but does not show extensive metabolism. Monoamine oxidase (MAO)-A and MAO-B do not metabolize phentermine. Seventy to 80% of a dose exists as unchanged phentermine in urine when administered alone. The mean phentermine terminal half-life is about 20 hours. The estimated phentermine oral clearance ( $CL/F$ ) is 8.79 L/h via population pharmacokinetic analysis.

## Topiramate

Topiramate does not show extensive metabolism. Six topiramate metabolites (via hydroxylation, hydrolysis, and glucuronidation) exist, none of which constitutes more than 5% of an administered dose. About 70% of a dose exists as unchanged topiramate in urine when administered alone. The mean topiramate terminal half-life is about 65 hours. The estimated topiramate  $CL/F$  is 1.17 L/h via population pharmacokinetic analysis.

## Specific Populations

### *Patients with Renal Impairment*

A single-dose, open-label study was conducted to evaluate the pharmacokinetics of QSYMIA 15 mg/92 mg in adult patients with varying degrees of chronic renal impairment compared to healthy volunteers with normal renal function. The study included patients with renal impairment classified on the basis of creatinine clearance as mild (greater or equal to 50 and less than 80 mL/min), moderate (greater than or equal to 30 and less than 50 mL/min), and severe (less than 30 mL/min). Creatinine clearance was estimated from serum creatinine based on the Cockcroft-Gault equation.

Compared to healthy volunteers, phentermine  $AUC_{0-inf}$  was 91%, 45%, and 22% higher in patients with severe, moderate, and mild renal impairment, respectively; phentermine  $C_{max}$  was 2% to 15% higher. Compared to healthy volunteers, topiramate  $AUC_{0-inf}$  was 126%, 85%, and 25% higher for patients with severe, moderate, and mild renal impairment, respectively; topiramate  $C_{max}$  was 6% to 17% higher. An inverse relationship between phentermine or topiramate  $C_{max}$  or  $AUC$  and creatinine clearance was observed.

QSYMIA has not been studied in patients with end-stage renal disease on dialysis [*see Dosage and Administration (2.4) and Use in Specific Populations (8.6)*].

### *Patients with Hepatic Impairment*

A single-dose, open-label study was conducted to evaluate the pharmacokinetics of QSYMIA 15 mg/92 mg in healthy volunteers with normal hepatic function compared with patients with mild (Child-Pugh score 5 - 6) and moderate (Child-Pugh score 7 - 9) hepatic impairment. In patients with mild and moderate hepatic impairment, phentermine  $AUC$  was 37% and 60% higher compared to healthy volunteers. Pharmacokinetics of topiramate was not affected in patients with mild and moderate hepatic impairment when compared with healthy

volunteers. QSYMIA has not been studied in patients with severe hepatic impairment (Child-Pugh score 10 - 15) [see *Dosage and Administration (2.5)* and *Use in Specific Populations (8.7)*].

#### *Pediatric Patients 12 to 17 years old*

A randomized, double-blind, placebo-controlled study was conducted to evaluate the population pharmacokinetics of QSYMIA using data from 37 pediatric patients (12 to 17 years of age) with obesity. QSYMIA dosages of 3.75 mg/23 mg, 7.5 mg/46 mg, and 15 mg/92 mg were studied. QSYMIA exposure in the pediatric patients appeared comparable to that in adults.

#### Drug Interaction Studies

##### *In Vitro Assessment of Drug Interactions*

##### *Phentermine*

Phentermine is not an inhibitor of CYP isozymes CYP1A2, CYP2C9, CYP2C19, CYP2D6, CYP2E1, and CYP3A4, and is not an inhibitor of monoamine oxidases. Phentermine is not an inducer of CYP1A2, CYP2B6, and CYP3A4. Phentermine is not a P-glycoprotein substrate.

##### *Topiramate*

Topiramate is not an inhibitor of CYP isozymes CYP1A2, CYP2A6, CYP2B6, CYP2C9, CYP2D6, CYP2E1, and CYP3A4/5. However, topiramate is a mild inhibitor of CYP2C19. Topiramate is a mild inducer of CYP3A4. Topiramate is not a P-glycoprotein substrate.

##### *Effects of Phentermine/Topiramate on Other Drugs*

[Table 7](#) describes the effect of phentermine/topiramate on the pharmacokinetics of co-administered drugs.

**Table 7. Effect of Phentermine/Topiramate on the Pharmacokinetics of Co-administered Drugs**

Phentermine/Topiramate	Co-administered Drug and Dosing Regimen		
	Drug and Dose (mg)	Change in AUC	Change in C <sub>max</sub>
*15 mg/92 mg dose QD for 16 days	Metformin 500 mg BID for 5 days	↑ 23%	↑ 16%
*15 mg/92 mg dose QD for 21 days	Sitagliptin 100 mg QD for 5 days	↓ 3%	↓ 9%
**15 mg/92 mg dose QD for 15 days	Oral contraceptive single dose norethindrone 1 mg ethinyl estradiol 35 mcg	↑ 16% ↓ 16%	↑ 22% ↓ 8%
*A single study examined the effect of multiple-dose QSYMIA 15 mg/92 mg once daily on the pharmacokinetics of multiple-dose 500 mg metformin twice daily and multiple-dose 100 mg sitagliptin once daily in 10 males and 10 females (mean BMI of 27.1 kg/m <sup>2</sup> and range of 22.2 – 32.7 kg/m <sup>2</sup> ). The study participants received metformin, sitagliptin, phentermine/topiramate only, phentermine/topiramate plus probenecid, phentermine/topiramate plus metformin, and phentermine/topiramate plus sitagliptin on Days 1 – 5, 6 – 10, 11 – 28, 29, 30 – 34, and 35 – 39, respectively. The significance of these interactions is unknown. **See <i>Drug Interactions (7)</i>			

*Effect of Other Drugs on Phentermine/Topiramate*

Table 8 describes the effect of other drugs on the pharmacokinetics of phentermine/topiramate.

**Table 8. Effect of Co-administered Drugs on the Pharmacokinetics of Phentermine/Topiramate**

Co-administered Drug and Dosing Regimen	Phentermine/Topiramate		
	Dose (mg)	Change in AUC	Change in C <sub>max</sub>
Topiramate 92 mg single dose	15 mg phentermine single dose	↑ 42%	↑ 13%
Phentermine 15 mg single dose	92 mg topiramate single dose	↑ 6%	↑ 2%
*Metformin 500 mg BID for 5 days	15 mg/92 mg dose QD for 16 days phentermine topiramate	↑ 5% ↓ 5%	↑ 7% ↓ 4%
*Sitagliptin 100 mg QD for 5 days	15 mg/92 mg dose QD for 21 days phentermine topiramate	↑ 9% ↓ 2%	↑ 10% ↓ 2%
*Probenecid 2 g QD	15 mg/92 mg dose QD for 11 days phentermine topiramate	↓ 0.3% ↑ 0.7%	↑ 4% ↑ 3%
*The same single study examined the effect of multiple-dose 500 mg metformin twice daily, a single-dose 2 g probenecid, and multiple-dose 100 mg sitagliptin once daily on the pharmacokinetics of multiple-dose phentermine/topiramate 15 mg/92 mg once daily in 10 males and 10 females (mean BMI of 27.1 kg/m <sup>2</sup> and range of 22.2 – 32.7 kg/m <sup>2</sup> ). The study participants received metformin, sitagliptin, phentermine/topiramate only, phentermine/topiramate plus probenecid, phentermine/topiramate plus metformin, and phentermine/topiramate plus sitagliptin on Days 1 – 5, 6 – 10, 11 – 28, 29, 30 – 34, and 35 – 39, respectively.			

*Effects of Topiramate Alone on Other Drugs and Effects of Other Drugs on Topiramate**Antiepileptic Drugs*

Potential interactions between topiramate and standard antiepileptic (AED) drugs were assessed in controlled clinical pharmacokinetic studies in patients with epilepsy. The effects of these interactions on mean plasma AUCs are summarized in Table 9.

In Table 9, the second column (AED concentration) describes what happens to the concentration of the AED listed in the first column when topiramate is added. The third column (topiramate concentration) describes how the co-administration of a drug listed in the first column modifies the concentration of topiramate in experimental settings when topiramate was given alone [see *Drug Interactions (7)*].

**Table 9. Summary of AED Interactions with Topiramate**

AED Co-administered	AED Concentration	Topiramate Concentration
Phenytoin	NC or 25% increase <sup>a</sup>	48% decrease
Carbamazepine (CBZ)	NC	40% decrease
CBZ epoxide <sup>b</sup>	NC	NE
Valproic acid	11% decrease	14% decrease
Phenobarbital	NC	NE
Primidone	NC	NE
Lamotrigine	NC at TPM doses up to 400 mg/day	13% decrease

<sup>a</sup> Plasma concentration increased 25% in some patients, generally those on a twice a day dosing regimen of phenytoin.  
<sup>b</sup> Is not administered but is an active metabolite of carbamazepine.  
NC = Less than 10% change in plasma concentration; NE = Not Evaluated; TPM = topiramate

### Digoxin

In a single-dose study, serum digoxin AUC was decreased by 12% with concomitant topiramate administration. The clinical relevance of this observation has not been established.

### Hydrochlorothiazide

A drug-drug interaction study conducted in healthy volunteers evaluated the steady-state pharmacokinetics of hydrochlorothiazide (HCTZ) (25 mg q24h) and topiramate (96 mg q12h) when administered alone and concomitantly. The results of this study indicate that topiramate  $C_{max}$  increased by 27% and AUC increased by 29% when HCTZ was added to topiramate. The clinical significance of this change is unknown. The steady-state pharmacokinetics of HCTZ were not significantly influenced by the concomitant administration of topiramate. Clinical laboratory results indicated decreases in serum potassium after topiramate or HCTZ administration, which were greater when HCTZ and topiramate were administered in combination [see [Drug Interactions \(7\)](#) and [Warnings and Precautions \(5.12\)](#)].

### Pioglitazone

A drug-drug interaction study conducted in healthy volunteers evaluated the steady-state pharmacokinetics of topiramate (96 mg twice daily) and pioglitazone (30 mg daily) when administered alone and concomitantly for 7 days. A 15% decrease in the area under the concentration-time curve during a dosage interval at steady state ( $AUC_{\tau,ss}$ ) of pioglitazone with no alteration in maximum steady-state plasma drug concentration during a dosage interval ( $C_{max,ss}$ ) was observed. This finding was not statistically significant. In addition, a 13% and 16% decrease in  $C_{max,ss}$  and  $AUC_{\tau,ss}$  respectively, of the active hydroxy-metabolite was noted as well as a 60% decrease in  $C_{max,ss}$  and  $AUC_{\tau,ss}$  of the active keto-metabolite [see [Drug Interactions \(7\)](#)].

### Glyburide

A drug-drug interaction study conducted in patients with type 2 diabetes mellitus evaluated the steady-state pharmacokinetics of glyburide (5 mg/day) alone and concomitantly with topiramate (150 mg/day). There was a 22% decrease in  $C_{max}$  and a 25% reduction in  $AUC_{24}$  for glyburide during topiramate administration. Systemic exposure (AUC) of the active metabolites, 4-*trans*-hydroxyglyburide (M1), and 3-*cis*-hydroxyglyburide (M2), was reduced by 13% and 15%, and  $C_{max}$  was reduced by 18% and 25%, respectively. The steady-state pharmacokinetics of topiramate were unaffected by concomitant administration of glyburide.

### Lithium

In patients, the pharmacokinetics of lithium were unaffected during treatment with topiramate at doses of 200 mg/day; however, there was an observed increase in systemic exposure of lithium (27% for  $C_{max}$  and 26% for AUC) following topiramate doses up to 600 mg/day.

### Haloperidol

The pharmacokinetics of a single dose of haloperidol (5 mg) were not affected following multiple dosing of topiramate (100 mg every 12 hours) in 13 healthy adults (6 males, 7 females).

### Amitriptyline

There was a 12% increase in AUC and  $C_{\max}$  for amitriptyline (25 mg per day) in 18 normal subjects (9 males, 9 females) receiving 200 mg/day of topiramate [see [Drug Interactions \(7\)](#)].

### Sumatriptan

Multiple dosing of topiramate (100 mg every 12 hrs) in 24 healthy volunteers (14 males, 10 females) did not affect the pharmacokinetics of single-dose sumatriptan either orally (100 mg) or subcutaneously (6 mg).

### Risperidone

When administered concomitantly with topiramate at escalating doses of 100, 250, and 400 mg/day, there was a reduction in risperidone systemic exposure (16% and 33% for steady-state AUC at the 250 and 400 mg/day doses of topiramate). No alterations of 9-hydroxyrisperidone levels were observed. Co-administration of topiramate 400 mg/day with risperidone resulted in a 14% increase in  $C_{\max}$  and a 12% increase in AUC<sub>12</sub> of topiramate. There were no clinically significant changes in the systemic exposure of risperidone plus 9-hydroxyrisperidone or of topiramate; therefore, this interaction is not likely to be of clinical significance.

### Propranolol

Multiple dosing of topiramate (200 mg/day) in 34 healthy volunteers (17 males, 17 females) did not affect the pharmacokinetics of propranolol following daily 160 mg doses. Propranolol doses of 160 mg/day in 39 volunteers (27 males, 12 females) had no effect on the exposure to topiramate, at a dose of 200 mg/day of topiramate.

### Dihydroergotamine

Multiple dosing of topiramate (200 mg/day) in 24 healthy volunteers (12 males, 12 females) did not affect the pharmacokinetics of a 1 mg subcutaneous dose of dihydroergotamine. Similarly, a 1 mg subcutaneous dose of dihydroergotamine did not affect the pharmacokinetics of a 200 mg/day dose of topiramate in the same study.

### Diltiazem

Co-administration of diltiazem hydrochloride extended-release with topiramate (150 mg/day) resulted in a 10% decrease in  $C_{\max}$  and a 25% decrease in diltiazem AUC, a 27% decrease in  $C_{\max}$  and an 18% decrease in des-acetyl diltiazem AUC, and no effect on N-desmethyl diltiazem. Co-administration of topiramate with diltiazem hydrochloride extended-release resulted in a 16% increase in  $C_{\max}$  and a 19% increase in AUC<sub>12</sub> of topiramate.

### Venlafaxine

Multiple dosing of topiramate (150 mg/day) in healthy volunteers did not affect the pharmacokinetics of venlafaxine or O-desmethyl venlafaxine. Multiple dosing of venlafaxine (150 mg extended release) did not affect the pharmacokinetics of topiramate.

## 13 NONCLINICAL TOXICOLOGY

### 13.1 Carcinogenesis, Mutagenesis, Impairment of Fertility

#### Phentermine/Topiramate

No animal studies have been conducted with the combination of phentermine/topiramate to evaluate carcinogenesis, mutagenesis, or impairment of fertility. The following data are based on findings in studies performed individually with phentermine or topiramate, QSYMIA's two active ingredients.

#### Phentermine

Phentermine was not mutagenic or clastogenic with or without metabolic activation in the Ames bacterial mutagenicity assay, a chromosomal aberration test in Chinese hamster lung (CHL-K1) cells, or an *in vivo* micronucleus assay.

Rats were administered oral doses of 3, 10, and 30 mg/kg/day phentermine for 2 years. There was no evidence of carcinogenicity at the highest dose of phentermine (30 mg/kg) which is approximately 11 to 15 times the maximum recommended clinical dose of QSYMIA 15 mg/92 mg based on AUC exposure.

No animal studies have been conducted with phentermine to determine the potential for impairment of fertility.

#### Topiramate

Topiramate did not demonstrate genotoxic potential when tested in a battery of *in vitro* and *in vivo* assays. Topiramate was not mutagenic in the Ames test or the *in vitro* mouse lymphoma assay; it did not increase unscheduled DNA synthesis in rat hepatocytes *in vitro*; and it did not increase chromosomal aberrations in human lymphocytes *in vitro* or in rat bone marrow *in vivo*.

An increase in urinary bladder tumors was observed in mice given topiramate (20, 75, and 300 mg/kg) in the diet for 21 months. The elevated bladder tumor incidence, which was statistically significant in males and females receiving 300 mg/kg, was primarily due to the increased occurrence of a smooth muscle tumor considered histomorphologically unique to mice. Plasma exposures in mice receiving 300 mg/kg were approximately 2 to 4 times steady-state exposures measured in patients receiving topiramate monotherapy at the MRHD of QSYMIA 15 mg/92 mg. The relevance of this finding to human carcinogenic risk is uncertain. No evidence of carcinogenicity was seen in rats following oral administration of topiramate for 2 years at doses up to 120 mg/kg (approximately 4 to 10 times the MRHD of QSYMIA based on AUC estimates).

No adverse effects on male or female fertility were observed in rats at doses up to 100 mg/kg (approximately 4 to 8 times male and female MRHD exposures of QSYMIA based on AUC).

## 14 CLINICAL STUDIES

### Clinical Studies in Adults

The effect of QSYMIA on weight loss in conjunction with reduced caloric intake and increased physical activity was studied in two randomized, double-blind, placebo-controlled studies in patients with obesity (Study 1) and patients with obesity or overweight with two or more significant co-morbidities (Study 2). Both studies had a 4-week titration period, followed by 52 weeks of treatment. There were two co-primary efficacy outcomes measured after 1 year of treatment (Week 56): 1) the percent weight loss from baseline; and 2) treatment response defined as achieving at least 5% weight loss from baseline.

In Study 1 (NCT00554216), patients with obesity (BMI greater than or equal to 35 kg/m<sup>2</sup>) were randomized to receive 1 year of treatment with placebo (N=514), QSYMIA 3.75 mg/23 mg (N=241), or QSYMIA 15 mg/92 mg (N=512) in a 2:1:2 ratio. Patients ranged in age from 18-71 years old (mean age 43) and 83%

were female. Approximately 80% were White, 18% were Black or African American, and 15% were Hispanic or Latino ethnicity. At the beginning of the study the average weight and BMI of patients was 116 kg and 42 kg/m<sup>2</sup>, respectively. Patients with type 2 diabetes mellitus were excluded from participating in Study 1. During the study, a well-balanced, reduced-calorie diet to result in an approximate 500 kcal/day decrease in caloric intake was recommended to all patients and patients were offered nutritional and lifestyle modification counseling.

In Study 2 (NCT00553787), patients with overweight or obesity were randomized to receive 1 year of treatment with placebo (N=994), QSYMIA 7.5 mg/46 mg (N=498), or QSYMIA 15 mg/92 mg (N=995) in a 2:1:2 ratio. Eligible patients had to have a BMI greater than or equal to 27 kg/m<sup>2</sup> and less than or equal to 45 kg/m<sup>2</sup> (there was no lower limit on BMI for patients with type 2 diabetes mellitus) and two or more of the following obesity-related co-morbid conditions:

- Elevated blood pressure (greater than or equal to 140/90 mmHg, or greater than or equal to 130/85 mmHg for diabetics) or requirement for greater than or equal to 2 antihypertensive medications;
- Triglycerides greater than 200-400 mg/dL or were receiving treatment with 2 or more lipid-lowering agents;
- Elevated fasting blood glucose (greater than 100 mg/dL) or diabetes; and/or
- Waist circumference greater than or equal to 102 cm for men or greater than or equal to 88 cm for females.

Patients ranged in age from 19 to 71 years of age (mean age 51) and 70% were female. Approximately 86% were White, 12% were Black or African American, and 13% were Hispanic or Latino ethnicity. The average weight and BMI of patients at the start of the study was 103 kg and 36.6 kg/m<sup>2</sup>, respectively. Approximately half (53%) of patients had hypertension at the start of the study. There were 388 (16%) patients with type 2 diabetes mellitus at the start of the study. During the study, a well-balanced, reduced-calorie diet to result in an approximate 500 kcal/day decrease in caloric intake was recommended to all patients and patients were offered nutritional and lifestyle modification counseling.

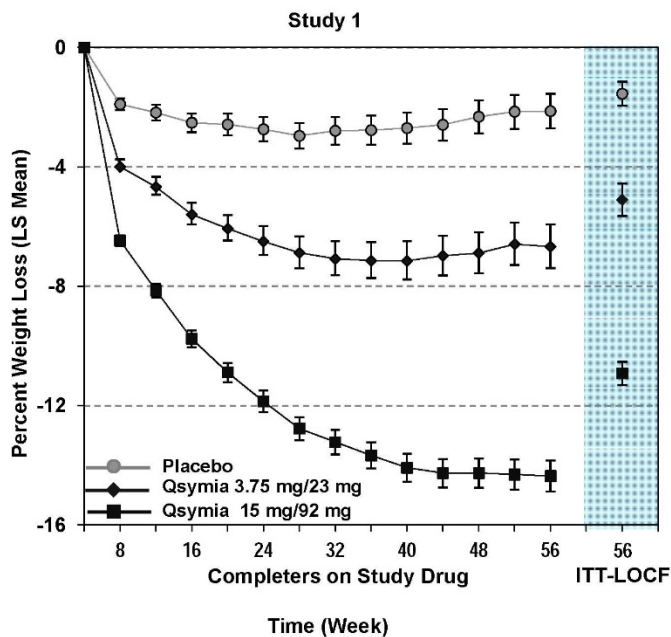
The percentage of randomized patients who withdrew from each study prior to week 56 was 40% in Study 1, and 31% in Study 2.

[Table 10](#) provides the results for weight loss at 1 year in Studies 1 and 2. After 1 year of treatment with QSYMIA, all dose levels resulted in statistically significant weight loss compared to placebo (see [Table 10](#), [Figure 1](#) and [Figure 2](#)). A statistically significant greater proportion of the patients randomized to QSYMIA than placebo achieved 5% and 10% weight loss.

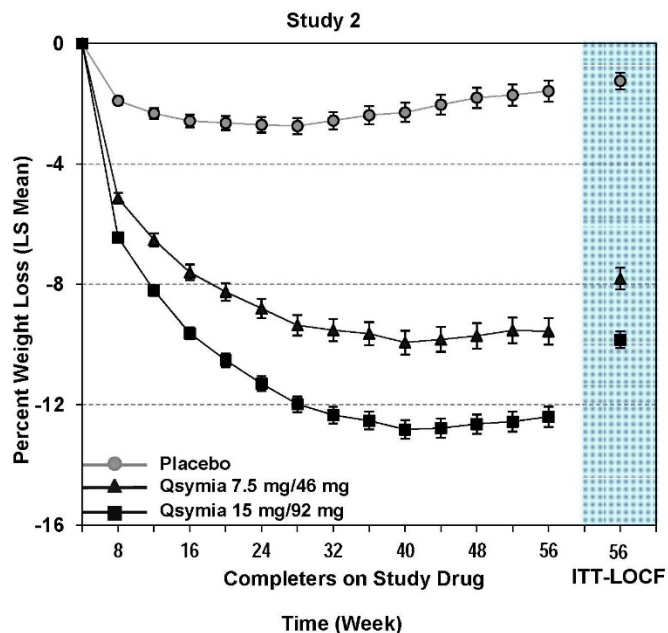
**Table 10. Weight Loss at One Year in Adult Patients in Studies 1 and 2**

Analysis Method	Study 1 (Obesity)			Study 2 (Obesity or Overweight with Co-morbidities)		
	Placebo	QSYMIA 3.75 mg/23 mg	QSYMIA 15 mg/92 mg	Placebo	QSYMIA 7.5 mg/46 mg	QSYMIA 15 mg/92 mg
ITT-LOCF (Primary)*	n = 498	n = 234	n = 498	n = 979	n = 488	n = 981
<b>Weight (kg)</b>						
Baseline mean (SD)	115.7 (21.4)	118.6 (21.9)	115.2 (20.8)	103.3 (18.1)	102.8 (18.2)	103.1 (17.6)
% LS Mean Change from baseline (SE)**	-1.6 (0.4)	-5.1 (0.5) <sup>†</sup>	-10.9 (0.4) <sup>†‡</sup>	-1.2 (0.3)	-7.8 (0.4) <sup>†</sup>	-9.8 (0.3) <sup>†‡</sup>
Difference from placebo (95% CI)		3.5 (2.4-4.7)	9.4 (8.4-10.3)		6.6 (5.8-7.4)	8.6 (8.0-9.3)
<b>Percentage of patients losing greater than or equal to 5% body weight</b>	17%	45% <sup>†</sup>	67% <sup>†‡</sup>	21%	62% <sup>†</sup>	70% <sup>†‡</sup>
Risk Difference vs. placebo (95% CI)		27.6 (20.4-34.8)	49.4 (44.1-54.7)		41.3 (36.3-46.3)	49.2 (45.4-53.0)
<b>Percentage of patients losing greater than or equal to 10% body weight</b>	7%	19% <sup>†</sup>	47% <sup>†‡</sup>	7%	37% <sup>†</sup>	48% <sup>†‡</sup>
Risk Difference vs. placebo (95% CI)		11.4 (5.9-16.9)	39.8 (34.8-44.7)		29.9 (25.3-34.5)	40.3 (36.7-43.8)
SD=standard deviation; LS=least-squares; SE=standard error; CI=confidence interval * Uses all available data from subjects in ITT population, including data collected from subjects who discontinued drug but remained on study. Last Observation Carried Forward (LOCF) method used to impute missing data. <sup>†</sup> p < 0.0001 vs. placebo based on least-squares (LS) mean from an analysis of covariance. <sup>‡</sup> p < 0.01 vs. 3.75 mg/23 mg (Study 1) or 7.5 mg/46 mg (Study 2) dose. Type 1 error was controlled across all pairwise treatment comparisons. ** Adjusted for baseline bodyweight (Study 1) and baseline bodyweight and diabetic status (Study 2).						

**Figure 1. Study 1 Percent Weight Change from Baseline to Week 56 in Adults with Obesity**



**Figure 2. Study 2 Percent Weight Change from Baseline to Week 56 in Adults with Obesity or Overweight with Co-morbidities**



$p < 0.0001$  for all three Qsymia doses vs placebo, and 15 mg/92 mg vs 7.5 mg/46 mg or 3.75 mg/23 mg at all time points for both completers and ITT-LOCF

The changes in cardiovascular, metabolic, and anthropometric risk factors associated with obesity from Study 1 and 2 are presented in [Table 11](#) and [Table 12](#).

**Table 11. Least-Squares (LS) Mean<sup>†</sup> Change from Baseline and Treatment Difference from Placebo in Cardiometabolic Parameters in Adults Following One Year of Treatment in Study 1 (Obesity)**

Study 1 (Obesity)	Placebo (N=498)	QSYMIA 3.75 mg/23 mg (N=234)	QSYMIA 15 mg/92 mg (N=498)	QSYMIA – Placebo: LS Mean	
				QSYMIA 3.75 mg/23 mg	QSYMIA 15 mg/92 mg
<b>Heart Rate, bpm</b>					
Baseline mean (SD)	73.2 (8.8)	72.3 (9.2)	73.1 (9.6)		
LS Mean Change (SE)	-0.8 (0.5)	+0.3 (0.6)	+1.0 (0.5)	+1.1	+1.8
<b>Systolic Blood Pressure, mmHg</b>					
Baseline mean (SD)	121.9 (11.5)	122.5 (11.1)	121.9 (11.6)		
LS Mean Change (SE)	+0.9 (0.6)	-1.8 (0.8)	-2.9 (0.6)	-2.8	-3.8
<b>Diastolic Blood Pressure, mmHg</b>					
Baseline mean (SD)	77.2 (7.9)	77.8 (7.5)	77.4 (7.7)		
LS Mean Change (SE)	+0.4 (0.4)	-0.1 (0.6)	-1.5 (0.4)	-0.5	-1.9
<b>Total Cholesterol, %</b>					
Baseline mean (SD)	194.3 (36.7)	196.3 (36.5)	192.7 (33.8)		
LS Mean Change (SE)	-3.5 (0.6)	-5.4 (0.9)	-6.0 (0.6)	-1.9	-2.5
<b>LDL-Cholesterol, %</b>					
Baseline mean (SD)	120.9 (32.2)	122.8 (33.4)	120.0 (30.1)		
LS Mean Change (SE)	-5.5 (1.0)	-7.7 (1.3)	-8.4 (0.9)	-2.2	-2.8
<b>HDL-Cholesterol, %</b>					
Baseline mean (SD)	49.5 (13.3)	50.0 (11.1)	49.7 (11.7)		
LS Mean Change (SE)	+0.0 (0.8)	+0.5 (1.1)	+3.5 (0.8)	+0.5	+3.5
<b>Triglycerides, %</b>					
Baseline mean (SD)	119.0 (39.3)	117.5 (40.3)	114.6 (37.1)		
LS Mean Change (SE)	+9.1 (2.3)	+5.2 (3.1)	-5.2 (2.2)	-3.9	-14.3
<b>Fasting Glucose, mg/dL</b>					
Baseline mean (SD)	93.1 (8.7)	93.9 (9.2)	93.0 (9.5)		
LS Mean Change (SE)	+1.9 (0.5)	+0.8 (0.7)	-0.6 (0.5)	-1.2	-2.5
<b>Waist Circumference, cm</b>					
Baseline mean (SD)	120.5 (14.0)	121.5 (15.2)	120.0 (14.7)		
LS Mean Change (SE)	-3.1 (0.5)	-5.6 (0.6)	-10.9 (0.5)	-2.5*	-7.8*

SD=standard deviation; SE=standard error

\* Statistically significant versus placebo based on the pre-specified method for controlling Type I error across multiple doses

† Study 1 adjusted for baseline bodyweight

**Table 12. Least-Squares (LS) Mean\* Change from Baseline and Treatment Difference from Placebo in Cardiometabolic Parameters in Adults Following One Year of Treatment in Study 2 (Obese or Overweight with Comorbidities)**

Study 2 (Overweight and Obese with Comorbidities)	Placebo (N=979)	QSYMIA 7.5 mg/46 mg (N=488)	QSYMIA 15 mg/92 mg (N=981)	QSYMIA – Placebo: LS Mean	
				QSYMIA 7.5 mg/46 mg	QSYMIA 15 mg/92 mg
<b>Heart Rate, bpm</b>					
Baseline mean (SD)	72.1 (9.9)	72.2 (10.1)	72.6 (10.1)		
LS Mean Change (SE)	-0.3 (0.3)	+0.3 (0.4)	+1.4 (0.3)	+0.6	+1.7
<b>Systolic Blood Pressure, mmHg</b>					
Baseline mean (SD)	128.9 (13.5)	128.5 (13.6)	127.9 (13.4)		
LS Mean Change (SE)	-2.4 (0.48)	-4.7 (0.63)	-5.6 (0.5)	-2.3	-3.2
<b>Diastolic Blood Pressure, mmHg</b>					
Baseline mean (SD)	81.1 (9.2)	80.6 (8.7)	80.2 (9.1)		
LS Mean Change (SE)	-2.7 (0.3)	-3.4 (0.4)	-3.8 (0.3)	-0.7	-1.1
<b>Total Cholesterol, %</b>					
Baseline mean (SD)	205.8 (41.7)	201.0 (37.9)	205.4 (40.4)		
LS Mean Change (SE)	-3.3 (0.5)	-4.9 (0.7)	-6.3 (0.5)	-1.6	-3.0
<b>LDL-Cholesterol, %</b>					
Baseline mean (SD)	124.2 (36.2)	120.3 (33.7)	123.9 (35.6)		
LS Mean Change (SE)	-4.1 (0.9)	-3.7 (1.1)	-6.9 (0.9)	+0.4	-2.8
<b>HDL-Cholesterol, %</b>					
Baseline mean (SD)	48.9 (13.8)	48.5 (12.8)	49.1 (13.8)		
LS Mean Change (SE)	+1.2 (0.7)	+5.2 (0.9)	+6.8 (0.7)	+4.0	+5.6
<b>Triglycerides, %</b>					
Baseline mean (SD)	163.5 (76.3)	161.1 (72.2)	161.9 (73.4)		
LS Mean Change (SE)	+4.7 (1.7)	-8.6 (2.2)	-10.6 (1.7)	-13.3	-15.3
<b>Fasting Insulin, (µIU/mL)</b>					
Baseline mean (SD)	17.8 (13.2)	18.0 (12.9)	18.4 (17.5)		
LS Mean Change (SE)	+0.7 (0.8)	-3.5 (1.1)	-4.0 (0.8)	-4.2	-4.7
<b>Fasting Glucose, mg/dL</b>					
Baseline mean (SD)	106.6 (23.7)	106.2 (21.0)	105.7 (21.4)		
LS Mean Change (SE)	+2.3 (0.6)	-0.1 (0.8)	-1.3 (0.6)	-2.4	-3.6
<b>Waist Circumference, cm</b>					
Baseline mean (SD)	113.4 (12.2)	112.7 (12.4)	113.2 (12.2)		
LS Mean Change (SE)	-2.4 (0.3)	-7.6 (0.4)	-9.2 (0.3)	-5.2*	-6.8*

SD=standard deviation; SE=standard error

\* Statistically significant versus placebo based on the pre-specified method for controlling Type I error across multiple doses

† Study 2 adjusted for baseline bodyweight and diabetic status

Among the 388 subjects with type 2 diabetes mellitus treated in Study 2, reductions in HbA1c from baseline (6.8%) were 0.1% for placebo compared to 0.4% and 0.4% with QSYMIA 7.5 mg/46 mg and QSYMIA 15 mg/92 mg, respectively.

### Clinical Studies in Pediatric Patients Aged 12 Years and Older

The effect of QSYMIA on BMI in conjunction with reduced caloric intake and increased physical activity was evaluated in Study 3 (NCT03922945), a 56-week, randomized, double-blind, placebo-controlled study in pediatric patients (12 to 17 years of age) with BMI  $\geq$  95<sup>th</sup> percentile standardized by age and sex. Patients were randomized to receive treatment with placebo (N=56), QSYMIA 7.5 mg/46 mg (N=54), or QSYMIA 15 mg/92 mg (N=113) in a 1:1:2 ratio. During the study, a well-balanced, reduced-calorie diet to result in an approximate 500 kcal/day decrease in caloric intake was recommended to all patients and patients were offered a family-based lifestyle modification program for adolescents.

Patients' mean age was 14 years old, approximately 55% were female, 67% were White, 26% were Black or African American, and 33% were Hispanic or Latino ethnicity. At the beginning of the study, the average weight and BMI of patients was 106 kg and 38 kg/m<sup>2</sup>, respectively, with approximately 81% considered

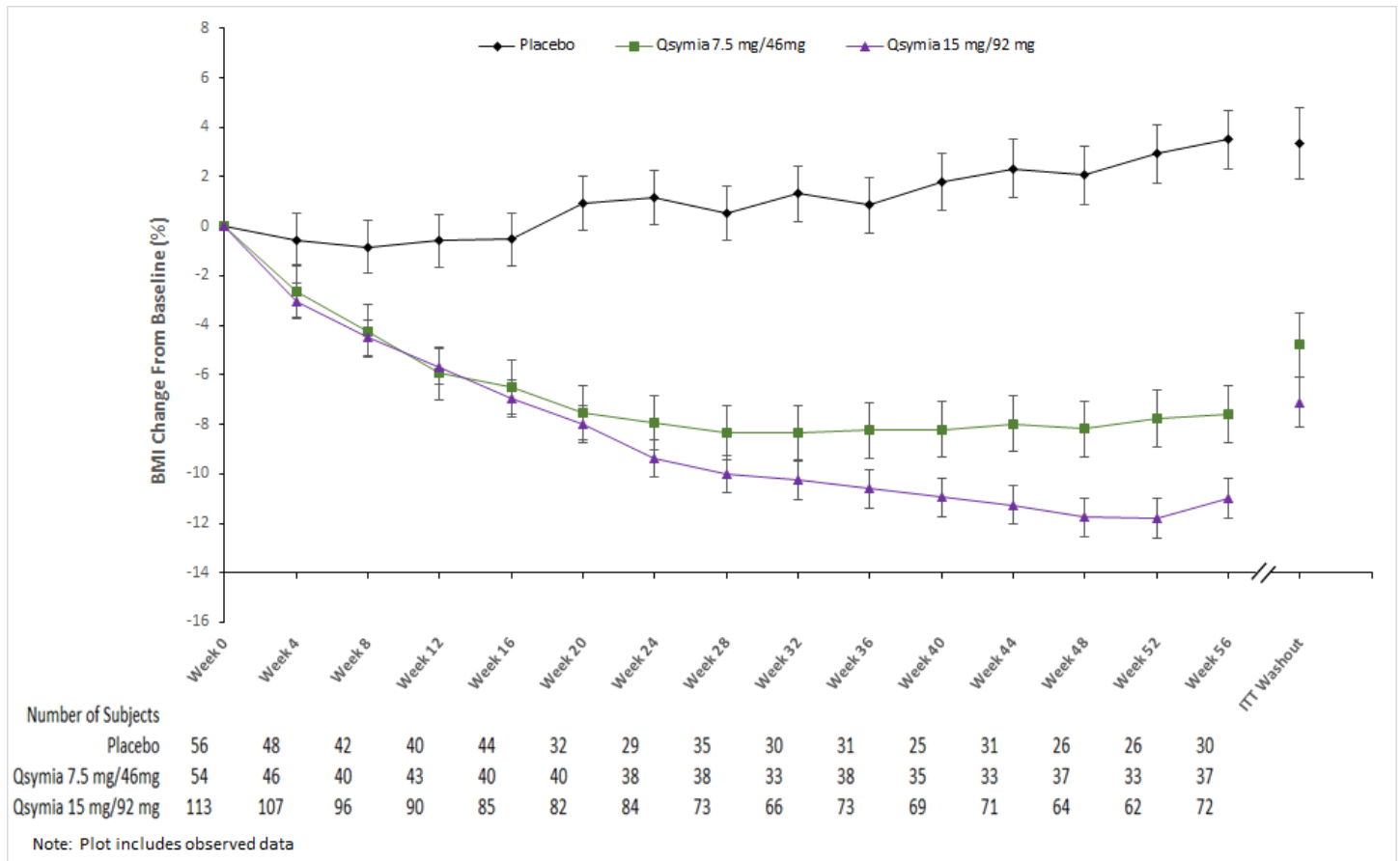
severely obese (120% of the 95<sup>th</sup> percentile or greater for BMI standardized by age and sex). Thirty-eight (38%) of randomized patients withdrew from the study prior to week 56.

The primary efficacy parameter was mean percent change in BMI. [Table 13](#) provides results for BMI reduction at Week 56 in Study 3. After 56 weeks of treatment with QSYMIA, all dose levels resulted in statistically significant reduction in BMI compared to placebo (see [Table 13](#), [Figure 3](#)). A greater proportion of patients randomized to QSYMIA than placebo achieved 5%, 10%, and 15% BMI reduction.

**Table 13. Change in BMI at Week 56 in Pediatric Patients Aged 12 to 17 Years in Study 3 (Obesity)**

Analysis Method	Placebo	QSYMIA 7.5 mg/46 mg	QSYMIA 15 mg/92 mg
ITT-Washout (Primary)*	n = 56	n = 54	n = 113
<b>BMI (kg/m<sup>2</sup>) Primary Efficacy Endpoint</b>			
Baseline mean (SD)	36.4 (6.4)	36.9 (6.7)	39.0 (7.4)
% LS Mean Change from baseline (SE)	+3.3 (1.4)	-4.8 (1.3)	-7.1 (1.0)
Difference from placebo (95% CI)		-8.1 (-11.9, -4.3)	-10.4 (-13.9, -7.0)
<b>Percentage of patients with a reduction of greater than or equal to 5% BMI</b>			
Difference vs. placebo (95% CI)	13.6%	44.0%	52.2%
<b>Percentage of patients with a reduction of greater than or equal to 10% BMI</b>			
Difference vs. placebo (95% CI)	4.5%	33.5%	44.4%
<b>Percentage of patients with a reduction of greater than or equal to 15% BMI</b>			
Difference vs. placebo (95% CI)	2.9%	13.6%	28.9%
SD=standard deviation; LS=least-squares; SE=standard error; CI=confidence interval			
*Missing data were imputed using a washout multiple imputation method based on placebo response.			

**Figure 3. Study 3 Percent BMI Change from Baseline to Week 56 in Pediatric Patients Aged 12 to 17 Years with Obesity**



The changes in cardiovascular, metabolic, and anthropometric risk factors associated with obesity from Study 3 are presented in [Table 14](#).

**Table 14. Change from Baseline and Treatment Difference from Placebo in Cardiometabolic Parameters in Pediatric Patients Aged 12 to 17 Years Following 56 Weeks of Treatment in Study 3 (Obesity)**

Study 3 (Obesity) ITT Population	Placebo (N=56)	QSYMIA 7.5 mg/46 mg (N=54)	QSYMIA 15 mg/92 mg (N=113)	QSYMIA – Placebo	
				QSYMIA 7.5 mg/46 mg	QSYMIA 15 mg/92 mg
<b>Heart Rate, bpm*</b>					
Baseline mean (SD)	76.8 (9.9)	78.6 (9.6)	76.2 (9.6)	-5.6	3.2
Mean Change (SD)	2.5 (12.4)	-3.1 (8.4)	5.7 (11.4)		
<b>Systolic Blood Pressure, mmHg</b>					
Baseline mean (SD)	117.7 (10.4)	121.4 (9.2)	117.4 (10.2)	-2.8	-1.0
LS Mean Change (SE)	+2.9 (1.6)	+0.1 (1.5)	+1.8 (1.1)		
<b>Diastolic Blood Pressure, mmHg</b>					
Baseline mean (SD)	71.7 (8.3)	75.8 (6.7)	72.9 (7.3)	-3.2	-2.2
LS Mean Change (SE)	+3.4 (1.5)	+0.2 (1.3)	+1.2 (1.0)		
<b>Total Cholesterol, mg/dL*</b>					
Baseline mean (SD)	164.9 (30.9)	160.6 (26.1)	159.4 (32.7)	-1.4	-1.2
Mean % Change (SD)	-1.8 (10.7)	-3.2 (13.1)	-3.0 (14.5)		
<b>LDL-Cholesterol, mg/dL*</b>					
Baseline mean (SD)	94.1 (26.8)	89.4 (23.7)	90.2 (27.3)	-3.9	-2.5
Mean % Change (SD)	0.2 (23.3)	-3.7 (15.5)	-2.3 (21.6)		
<b>HDL-Cholesterol, mg/dL</b>					
Baseline mean (SD)	47.2 (9.7)	47.2 (8.9)	46.7 (10.1)	6.4	5.0
LS Mean % Change (SE)	-4.3 (15.1)	+2.1 (11.5)	+0.7 (9.6)		
<b>Triglycerides, mg/dL</b>					
Baseline mean (SD)	118.3 (46.1)	120.1 (61.6)	112.2 (63.2)	-11.7	-11.2
LS Mean % Change (SE)	+5.6 (8.4)	-6.2 (8.0)	-5.6 (7.2)		
<b>HbA1c, %*</b>					
Baseline mean (SD)	5.5 (0.3)	5.6 (0.4)	5.5 (0.4)	-0.2	0.0
Mean Change (SD)	-0.2 (0.2)	-0.4 (0.3)	-0.2 (0.3)		
<b>Waist Circumference, cm</b>					
Baseline mean (SD)	111.1 (14.0)	111.9 (15.5)	116.5 (16.8)	-5.6	-7.6
LS Mean Change (SE)	+0.6 (1.4)	-5.0 (1.4)	-7.0 (1.1)		

SD=standard deviation; SE=standard error

\*Parameter was not pre-specified for inferential statistics; descriptive summary of change from baseline provided for subjects with non-missing data at baseline and Week 56.

## 16 HOW SUPPLIED/STORAGE AND HANDLING

QSYMIA (phentermine and topiramate extended-release capsules) are available as follows (see [Table 15](#)):

**Table 15. QSYMIA Presentations**

<b>Strength (phentermine mg/topiramate mg)</b>	<b>Description</b>	<b>How Supplied</b>	<b>NDC</b>
3.75 mg/23 mg extended-release capsules	Purple cap imprinted with VIVUS, Purple body imprinted with 3.75/23	Unit of Use Bottle (14 capsules)	62541-201-14
		Pharmacy Bottle (30 capsules)	62541-201-30
7.5 mg/46 mg extended-release capsules	Purple cap imprinted with VIVUS, Yellow body imprinted with 7.5/46	Unit of Use Bottle (30 capsules)	62541-202-30
11.25 mg/69 mg extended-release capsules	Yellow cap imprinted with VIVUS, Yellow body imprinted with 11.25/69	Pharmacy Bottle (30 capsules)	62541-203-30
15 mg/92 mg extended-release capsules	Yellow cap imprinted with VIVUS, White body imprinted with 15/92	Unit of Use Bottle (30 capsules)	62541-204-30
3.75 mg/23 mg and 7.5 mg/46 mg extended-release capsules	Purple cap imprinted with VIVUS, Purple body imprinted with 3.75/23 and Purple cap imprinted with VIVUS, Yellow body imprinted with 7.5/46	Starter Pack - Blister Configuration (28 Capsules)	62541-210-28
11.25 mg/69 mg and 15 mg/92 mg extended-release capsules	Yellow cap imprinted with VIVUS, Yellow body imprinted with 11.25/69	Dose Escalation Pack – Blister Configuration (28 Capsules)	62541-220-28

Store at 20°C to 25°C (68°F to 77°F), excursions permitted between 15°C and 30°C (59°F and 86°F) [see USP Controlled Room Temperature]. Keep container tightly closed and protect from moisture.

## 17 PATIENT COUNSELING INFORMATION

Advise the patient to read the FDA-approved patient labeling (Medication Guide).

### Embryo-Fetal Toxicity

Inform patients who can become pregnant that QSYMIA can cause fetal harm and patients should avoid getting pregnant while taking QSYMIA [see *Warnings and Precautions (5.1)*, *Drug Interactions (7)*, and *Use in Specific Populations (8.3)*].

Advise patients who can become pregnant:

- that pregnancy testing is recommended before initiating QSYMIA and monthly during therapy;
- to use effective contraception during QSYMIA therapy;
- who experience spotting while taking a combined oral contraceptive to notify their health care provider;
- with a known or suspected pregnancy to stop QSYMIA immediately and notify their health care provider.

### Access to QSYMIA

Advise patients that QSYMIA is only available through certified pharmacies that are enrolled in the QSYMIA certified pharmacy network. Advise patients on how to access QSYMIA through certified pharmacies. Additional information may be obtained via the website [www.QSYMIAREMS.com](http://www.QSYMIAREMS.com) or by telephone at 1-888-998-4887.

### Suicidal Behavior and Ideation and Mood and Sleep Disorders

Inform patients that QSYMIA can increase the risk of mood changes, sleep disorders, depression, and suicidal ideation. Advise patients to tell their health care provider(s) immediately if mood changes, depression, or suicidal ideation occur [see *Warnings and Precautions (5.2, 5.4)*].

### Ophthalmologic Adverse Reactions

Inform patients that QSYMIA can increase the risk of acute myopia, secondary angle closure glaucoma, and visual field defects. Advise patients to immediately report symptoms of severe and persistent eye pain or significant changes in their vision to their health care provider(s) [see *Warnings and Precautions (5.3)*].

### Cognitive Impairment

Inform patients that QSYMIA can cause confusion, concentration, and word-finding difficulties. Inform patients that the concomitant use of alcohol or central nervous system (CNS) depressant drugs with QSYMIA, may increase the risk of dizziness, cognitive adverse reactions, drowsiness, light-headedness, impaired coordination and somnolence.

Advise patients to tell their health care provider(s) about any changes in attention, concentration, memory, difficulty finding words, or other cognitive functions.

Advise patients not to drive or operate machinery until they have gained sufficient experience on QSYMIA to gauge whether it adversely affects their mental performance, motor performance, and/or vision. Advise patients to avoid excessive alcohol intake while taking QSYMIA [see *Warnings and Precautions (5.5)*].

### Slowing of Linear Growth

Discuss with the patient and caregiver that long-term QSYMIA treatment may attenuate growth as reflected by slower height increase in pediatric patients [see *Warnings and Precautions (5.6)*].

### Metabolic Acidosis

Inform patients that QSYMIA can increase the risk of metabolic acidosis. Advise patients to tell their health care provider(s) about any factors that can increase the risk of acidosis (e.g. prolonged diarrhea, surgery, and high protein/low carbohydrate diet, and/or concomitant medications such as carbonic anhydrase inhibitors) [see *Warnings and Precautions (5.7)*].

### Risk of Seizures with Abrupt Withdrawal of QSYMIA

Inform patients that abrupt withdrawal of topiramate has been associated with seizures in individuals without a history of seizures or epilepsy. Advise patients not to abruptly stop QSYMIA without first talking to their health care provider(s) [see *Dosage and Administration (2.3)* and *Warnings and Precautions (5.9)*].

### Kidney Stones

Inform patients that use of QSYMIA has been associated with kidney stone formation. Advise patients to increase fluid intake to increase urinary output which can decrease the concentration of substances involved in kidney stone formation. Advise patients to report symptoms of severe side or back pain, and/or blood in their urine to their health care provider(s) [see *Warnings and Precautions (5.10)* and *Adverse Reactions (6.1)*].

### Oligohidrosis and Hyperthermia

Inform patients that oligohidrosis (decreased sweating) has been reported in association with the use of topiramate particularly in pediatric patients. Advise patients to monitor for decreased sweating and increased body temperature during physical activity, especially in hot weather [see *Warnings and Precautions (5.11)*].

### Serious Skin Reactions

Inform patients that serious skin reactions have been reported with use of topiramate. Inform patients of the signs of serious skin reactions and advise patients to report signs of a skin reaction to their health care provider(s) [see *Warning and Precautions (5.13)*].

### Lactation

Advise patients that breastfeeding is not recommended during QSYMIA treatment [see *Use in Specific Populations (8.2)*].

### Allergic Reactions Due to Inactive Ingredient FD&C Yellow No. 5

Inform patients that this product contains FD&C Yellow No. 5 (tartrazine) which may cause allergic-type reactions (including bronchial asthma) in certain susceptible persons [see *Warnings and Precautions (5.14)*].

### How to Take QSYMIA

Instruct patients on the dosage titration schedule of QSYMIA. Advise patients to take QSYMIA in the morning with or without food [see *Dosage and Administration (2.2)*].

Manufactured for VIVUS LLC by Catalent Pharma Solutions, LLC  
1100 Enterprise Drive  
Winchester, KY 40391

Copyright © 2012 - 2023 VIVUS LLC All rights reserved.

VIVUS LLC  
900 E. Hamilton Ave., Suite 550  
Campbell, CA 95008 USA



US Patent Numbers: 7,056,890; 7,553,818; 7,659,256; 7,674,776; 8,580,298; 8,580,299; 8,895,057; 8,895,058,  
9,011,905; and 9,011,906

QSYMIA IS A REGISTERED TRADEMARK OF VIVUS LLC

# Risk Evaluation and Mitigation Strategy (REMS) Document

## Qsymia (phentermine and topiramate extended-release capsules) REMS

### I. Administrative Information

Risk: Embryo-fetal toxicity  
Application Number: NDA 22580 (and authorized generic)  
Application Holder: VIVUS LLC  
Initial REMS Approval: 07/2012  
Most Recent REMS Update: 11/2024

### II. REMS Goal

To inform certified pharmacies and patients of reproductive potential about:

1. The increased risk of embryo-fetal toxicity with major congenital malformations, including but not limited to cleft lip and/or cleft palate (oral clefts), and of being small for gestational age (SGA) in a fetus exposed to Qsymia during the first trimester of pregnancy
2. The importance of pregnancy prevention for patients of reproductive potential receiving Qsymia
3. The need to discontinue Qsymia immediately if pregnancy occurs

### III. REMS Requirements

**VIVUS LLC must ensure that pharmacies and wholesalers-distributors comply with the following requirements:**

---

#### 1. Pharmacies that dispense Qsymia must:

- |                                 |   |
|---------------------------------|---|
| To become certified to dispense | <ol style="list-style-type: none"><li>1. Designate an Authorized Representative to carry out the certification process and oversee implementation and compliance with the REMS on behalf of the pharmacy.</li><li>2. Have the Authorized Representative successfully complete the <a href="#">Qsymia REMS Pharmacy Training</a>.</li><li>3. Have the Authorized Representative enroll in the REMS on behalf of the pharmacy by completing and submitting the <a href="#">Pharmacy Enrollment Form</a> to the REMS.</li><li>4. Train all relevant staff involved in dispensing on the risks associated with Qsymia and requirement to provide the <a href="#">Medication Guide</a> and <a href="#">Risk of Birth Defects with Qsymia</a> using the <a href="#">Qsymia REMS Pharmacy Training</a>.</li><li>5. Establish processes and procedures to provide the <a href="#">Medication Guide</a> and the <a href="#">Risk of Birth Defects with Qsymia</a> to each patient each time Qsymia is dispensed.</li></ol> |
|---------------------------------|---|
-

Before dispensing	6. Provide the patient with the <a href="#">Medication Guide</a> and the <a href="#">Risk of Birth Defects with Qsymia</a> through the processes and procedures established as a requirement of the REMS.
To maintain certification to dispense	7. Have the new Authorized Representative enroll in the REMS by completing the Pharmacy Training and completing and submitting the <a href="#">Pharmacy Enrollment Form</a> if the Authorized Representative changes.
At all times	8. Not distribute, transfer, loan, or sell Qsymia. 9. Maintain records of standard operating procedures, training, and providing the <a href="#">Medication Guide</a> and the <a href="#">Risk of Birth Defects with Qsymia</a> . 10. Maintain and submit annual compliance reports to the REMS. 11. Comply with audits carried out by VIVUS LLC or a third party acting on behalf of VIVUS LLC to ensure that all processes and procedures are in place and are being followed.

## 2. Wholesalers-distributors that distribute Qsymia must:

To be able to distribute	1. Establish processes and procedures to ensure that the drug is distributed only to certified pharmacies.
At all times	2. Distribute only to certified pharmacies. 3. Maintain and submit annual compliance reports of adherence to distribution requirements of the REMS. 4. Comply with audits carried out by VIVUS LLC or a third party acting on behalf of VIVUS LLC to ensure that all processes and procedures are in place and are being followed.

### VIVUS LLC must provide training to pharmacies who dispense Qsymia.

The training includes the following educational material: [Qsymia REMS Pharmacy Training](#). The training must be available online and hard copy by mail or fax.

### To support REMS operations, VIVUS LLC must:

1. Establish and maintain a REMS website, [www.QsymiaREMS.com](http://www.QsymiaREMS.com). The REMS website must include the capability to complete pharmacy certification via fax or email, to locate certified pharmacies, and the option to print the Prescribing Information, [Medication Guide](#), and REMS materials. The product website for consumers and healthcare providers must include prominent REMS-specific links to the REMS website. The REMS website must not link back to the promotional product website.
2. Make the REMS website fully operational and all REMS materials are available through the website within 90 calendar days of REMS modification.
3. Establish and maintain a Support Center for REMS participants at 1-888-998-4887 and a REMS Pharmacy Support Center for pharmacists at 1-855-302-6698.
4. Establish and maintain a validated, secure database of all REMS participants who are

- enrolled and/or certified in the Qsymia REMS.
5. Ensure pharmacies are able to become certified via fax or email.
  6. Ensure that a [Medication Guide](#) is made available for dispensing with each Qsymia prescription.
  7. Provide the [Qsymia REMS Pharmacy Training](#) and the Prescribing Information to pharmacies who (1) attempt to dispense Qsymia and are not yet certified or (2) inquire about how to become certified.
  8. Notify pharmacies within 5 business days after they become certified in the REMS.
  9. Provide authorized wholesalers-distributors access to the database of certified pharmacies.

**To ensure REMS participants' compliance with the REMS, VIVUS LLC must:**

10. Maintain adequate records to demonstrate that REMS requirements have been met, including, but not limited to records of: Qsymia distribution and dispensing, certification of pharmacies, and audits of REMS participants. These records must be readily available for FDA inspections.
11. Establish and maintain a plan for addressing noncompliance with REMS requirements.
12. Monitor pharmacies and wholesalers-distributors on an ongoing basis to ensure the requirements of the REMS are being met. Take corrective action if non-compliance is identified, including de-certification.
13. Audit certified pharmacies in accordance with the audit plan no later than 180 calendar days after they become certified and conduct ongoing audits of pharmacies in accordance with the audit plan to ensure that all REMS processes and procedures are in place, functioning, and support the REMS requirements.
14. Audit wholesalers-distributors no later than 180 calendar days after the wholesaler-distributor is authorized and every two years thereafter to ensure that all processes and procedures are in place, functioning, and support the REMS requirements.
15. Take reasonable steps to improve implementation of and compliance with the requirements in the Qsymia REMS based on monitoring and evaluation of the Qsymia REMS.

## **IV. REMS Assessment Timetable**

VIVUS LLC must submit REMS Assessments at 6 months and 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 calendar days before the submission date for that assessment. VIVUS LLC must submit each assessment so that it will be received by the FDA on or before the due date.

## **V. REMS Materials**

The following materials are part of the Qsymia REMS:

### **Enrollment Forms**

#### Pharmacy

1. [Pharmacy Enrollment Form](#)

## **Training and Educational Materials**

Pharmacy:

2. [Qsymia REMS Pharmacy Training](#)

Patient:

3. [Medication Guide](#)
4. [Risk of Birth Defects with Qsymia](#)

## **Other Materials**

5. [REMS Website](#)

## **VI. Statutory Elements**

This REMS is required under section 505-1 of the Federal Food, Drug and Cosmetic Act (FD&C Act) (21.U.S.C. 355-1) and consists of the following elements:

- [Medication Guide](#)
- Elements to Assure Safe Use:
  - Pharmacies and health care settings that dispense Qsymia are specially certified under 505-1(f)(3)(B)
- Implementation System
- Timetable for Submission of Assessments

## **Qsymia<sup>®</sup> Risk Evaluation and Mitigation Strategy (REMS)**

### **Pharmacy Enrollment Form**

Because of the teratogenic risk associated with Qsymia therapy, Qsymia is available through a limited program under a REMS. Under the Qsymia REMS, only certified pharmacies may distribute Qsymia. I understand that my certified pharmacy and any retail chain pharmacy dispensing locations associated with my pharmacy must comply with the program requirements for certified pharmacies and the terms contained in this form.

#### **As the Authorized Representative, I must:**

- Carry out the certification process and oversee implementation and compliance with the Qsymia REMS on behalf of the pharmacy
- Complete the Qsymia REMS Pharmacy Training
- Complete the Pharmacy Enrollment Form and fax or email the form to the Qsymia REMS Pharmacy Support Center
- Train all relevant staff involved in dispensing on the risks associated with Qsymia and the requirement to provide the Medication Guide and the *Risk of Birth Defects with Qsymia* patient brochure using the Qsymia REMS Pharmacy Training
- Establish processes and procedures to provide the Medication Guide and the *Risk of Birth Defects with Qsymia* patient brochure to each patient each time Qsymia is dispensed

#### **Before dispensing, all pharmacy staff must:**

- Provide the patient with the Medication Guide and the *Risk of Birth Defects with Qsymia* patient brochure through the processes and procedures established as a requirement of the REMS program

#### **At all times, all pharmacy staff must:**

- Not distribute, transfer, loan, or sell Qsymia
- Maintain records of standard operating procedures, training, and providing the Medication Guide and the *Risk of Birth Defects with Qsymia* patient brochure
- Maintain and submit annual compliance reports to the Qsymia REMS
- Comply with audits carried out by VIVUS to ensure that all processes and procedures are in place and are being followed
- Have a new Authorized Representative enroll in the Qsymia REMS by completing the Qsymia REMS Pharmacy Training and the Pharmacy Enrollment Form

**Authorized Representative to complete (all fields required):**

**First Name** \_\_\_\_\_ **Last Name** \_\_\_\_\_

**Phone Number** \_\_\_\_\_ **Fax** \_\_\_\_\_

**Email** \_\_\_\_\_

**Pharmacy Name** \_\_\_\_\_

**Pharmacy Type (Corporate, Independent, Mail Order, Closed System)** \_\_\_\_\_

**Pharmacy DEA** \_\_\_\_\_ **Pharmacy NCPDP** \_\_\_\_\_ **Pharmacy NPI** \_\_\_\_\_

**Address** \_\_\_\_\_ **City** \_\_\_\_\_

**State** \_\_\_\_\_ **Zip Code** \_\_\_\_\_

**Signature** \_\_\_\_\_ **Date** \_\_\_\_\_

**Authorized Representative**

**Please fax the completed form to the Qsymia REMS Pharmacy Support Center at 855-302-6699 or email the form to VivusUSREMS.sm@ppd.com.**

Once this form is successfully processed, you will receive a pharmacy enrollment confirmation via email from VIVUS. Your pharmacy will be considered certified to order, receive, and dispense Qsymia.

***Important Enrollment Information for Corporate Chain Entities with Retail Chain Pharmacy Dispensing Locations***

The Qsymia REMS Pharmacy Training for retail chain pharmacy dispensing locations is available through the Qsymia REMS website ([www.QsymiaREMS.com](http://www.QsymiaREMS.com)). Once the Training and Knowledge Assessment are completed at a pharmacy dispensing location within your organization, it is the responsibility of the Authorized Representative to capture the following required pharmacy dispensing location information for each trained retail chain pharmacy dispensing location and submit the information to VIVUS:

- Dispensing pharmacy address
- Phone and fax numbers
- Pharmacy DEA, NCPDP, and NPI numbers

Once VIVUS receives, processes, and confirms the required retail chain pharmacy dispensing location information from the Authorized Representative, the pharmacy dispensing location will be considered certified and permitted to order, receive, and dispense Qsymia.

**If you have any questions or require additional information, please contact the Qsymia REMS Pharmacy Support Center at 1-855-302-6698.**

# Qsymia<sup>®</sup> (phentermine and topiramate extended-release capsules) for oral use, CIV

## Pharmacy Training

---

### Overview

The Food and Drug Administration (FDA) has required a Risk Evaluation and Mitigation Strategy (REMS) for Qsymia to ensure the benefits of Qsymia outweigh the increased risk of teratogenicity.

### Purpose

The goal of the Qsymia REMS is to inform certified pharmacies and patients of reproductive potential (PRP) about the:

- Increased risk of embryo-fetal toxicity with major congenital malformations, including but not limited to cleft lip and/or cleft palate oral clefts) and of being small for gestational age (SGA) in a fetus exposed to Qsymia during the first trimester of pregnancy
- Importance of pregnancy prevention for PRP
- Need to discontinue Qsymia immediately if pregnancy occurs

### Complete the Qsymia Pharmacy Certification in 3 easy steps:

1. Designate an Authorized Representative to carry out the certification process and oversee implementation and compliance with the Qsymia REMS.
2. Read through the entirety of this Qsymia REMS Pharmacy Training and confirm you understand the content by completing the Knowledge Assessment questions.  
- For dispensing locations of corporate chain pharmacies, your training and knowledge assessment will be managed by your corporate Authorized Representative. Please contact your corporate Authorized Representative for instructions on completing your training and knowledge assessment.
3. Complete the Pharmacy Enrollment Form and fax the form to the Qsymia REMS Pharmacy Support Center at 1-855-302-6699 or email the form to [VivusUSREMS.sm@ppd.com](mailto:VivusUSREMS.sm@ppd.com).

## Complete the Qsymia Pharmacy Training

These training materials are being provided to assist pharmacists with understanding the risks of Qsymia and the pharmacy requirements under the REMS. Before you are eligible to dispense Qsymia, it is important to be aware of the increased risk of embryo-fetal toxicity associated with Qsymia therapy.

The information presented in this training does not include a complete list of all risks and safety information on Qsymia. Before dispensing Qsymia, please read the accompanying Qsymia Prescribing Information, Qsymia Medication Guide, and the *Risk of Birth Defects with Qsymia* patient brochure.

Further information is also available on the Website, [www.QsymiaREMS.com](http://www.QsymiaREMS.com), or by calling the Qsymia REMS Pharmacy Support Center at 1-855-302-6698.

## Indication and Patient Selection

Qsymia is indicated in combination with a reduced-calorie diet and increased physical activity to reduce excess body weight and maintain weight reduction long term in:

- Adults and pediatric patients aged 12 years and older with obesity
- Adults with overweight in the presence of at least one weight-related comorbid condition

## Limitations of use:

- The effect of Qsymia on cardiovascular morbidity and mortality has not been established.
- The safety and effectiveness of Qsymia in combination with other products intended for weight loss including prescription drugs, over-the-counter drugs, and herbal preparations, have not been established.

## Qsymia is only dispensed through Certified Pharmacies

### To become a certified pharmacy, the Authorized Representative must:

- Carry out the certification process and oversee implementation and compliance with the Qsymia REMS on behalf of the pharmacy
- Complete the Pharmacy Training
- Complete the Pharmacy Enrollment Form and submit it to the Qsymia REMS
- Train all relevant staff involved in dispensing on the risks associated with Qsymia and the requirement to provide the Medication Guide and *Risk of Birth Defects with Qsymia* patient brochure using the Pharmacy Training
- Establish processes and procedures to provide the Medication Guide and *Risk of Birth Defects with Qsymia* patient brochure to each patient each time the drug is dispensed

### To become a certified pharmacy, the Authorized Representative must:

- Provide the patient with the Medication Guide and the *Risk of Birth Defects with Qsymia* patient brochure through the processes and procedures established as a requirement of the Qsymia REMS

### At all times, all pharmacy staff must:

- Not distribute, transfer, loan, or sell Qsymia
- Maintain records of standard operating procedures, training, and providing the Medication Guide and the *Risk of Birth Defects with Qsymia* patient brochure
- Maintain and submit annual compliance reports to the Qsymia REMS
- Comply with audits carried out by VIVUS to ensure that all processes and procedures are in place and are being followed
- Have a new Authorized Representative enroll in the Qsymia REMS by completing the Qsymia REMS Pharmacy Training and the Pharmacy Enrollment Form

The list of certified pharmacies will be updated within 5 business days after a new pharmacy is certified and eligible to dispense. Prescribers and patients will be able to use a “Certified Pharmacy Locator” tool to identify certified pharmacies in their area and can be found at [www.QsymiaREMS.com](http://www.QsymiaREMS.com).

Please note that Qsymia is not available outside this network of certified pharmacies.

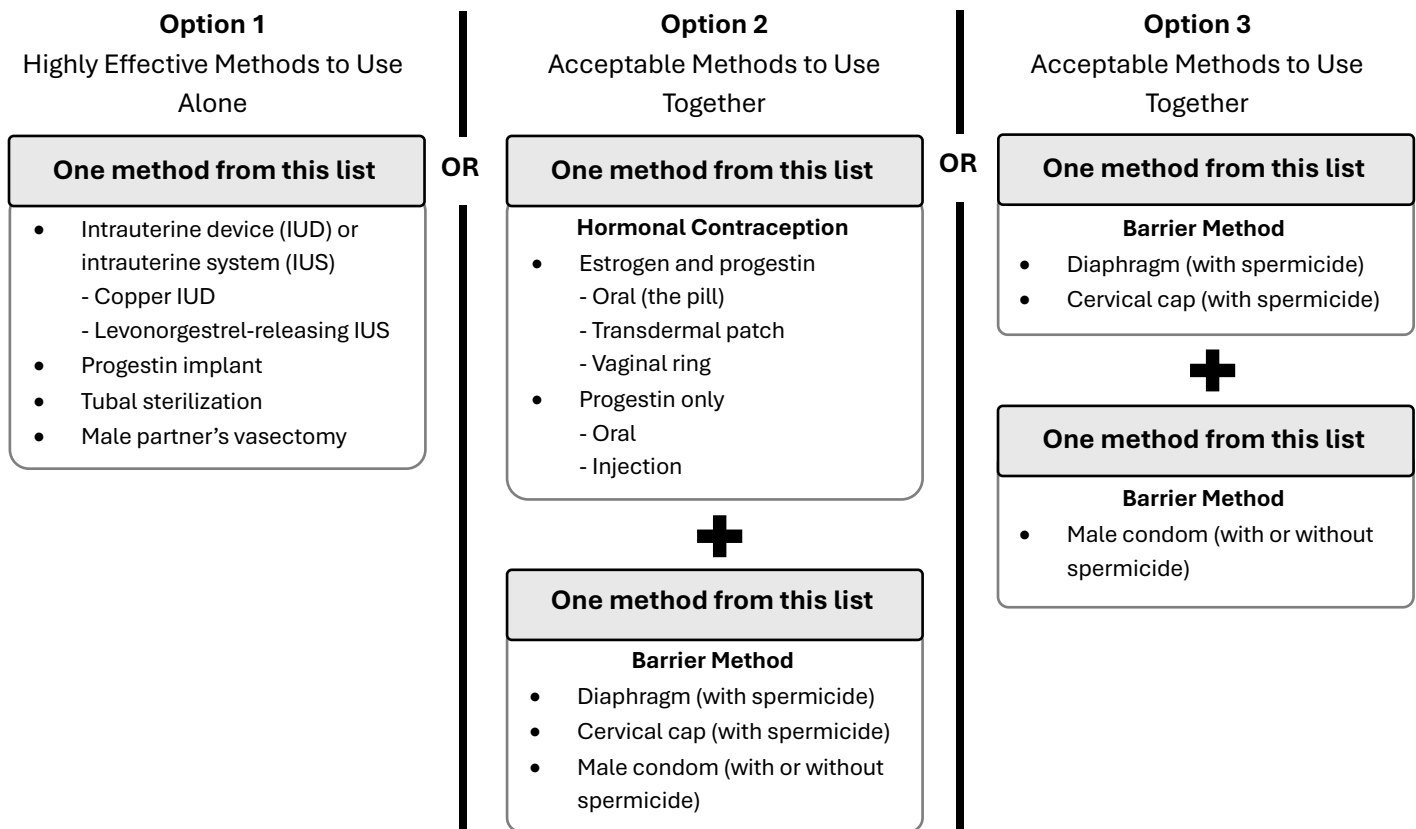
## Counseling for Patients of Reproductive Potential\*

**Qsymia<sup>®</sup> can cause fetal harm.**

**Advise patients of reproductive potential that labeling recommends:**

- Pregnancy testing prior to beginning Qsymia and monthly during therapy. Specific documentation of the result is not required at the pharmacy level.
- Use of effective contraception consistently during Qsymia therapy because Qsymia can cause certain kinds of birth defects (oral clefts). Even patients who believe they cannot become pregnant should use effective contraception while taking Qsymia due to the potential for increased fertility associated with weight loss.
- If a patient becomes pregnant while taking Qsymia, Qsymia should be discontinued immediately and the patient advised to notify their healthcare provider.

### Acceptable Contraception Methods For Patients of Reproductive Potential



\*Patients of reproductive potential are patients who have NOT had a hysterectomy, bilateral oophorectomy, or medically documented spontaneous ovarian failure, and have not gone through menopause. Menopause should be clinically confirmed by an individual's healthcare provider.

Advise nursing mothers not to use Qsymia. Qsymia may be present in human milk because topiramate and amphetamines (phentermine has pharmacologic activity and a chemical structure similar to amphetamines) are excreted in human milk.

## Counseling for All Patients

- The Medication Guide and patient brochure contain important information that patients should read and become familiar with.
- Qsymia should be taken in the morning, with or without food.
- Avoid taking Qsymia in the evening due to the possibility of insomnia.
- Advise patients to start treatment with Qsymia as follows:
  - Take one Qsymia capsule (containing 3.75 mg of phentermine and 23 mg of topiramate) once each morning for the first 14 days
  - After the first 14 days, take one Qsymia 7.5 mg/46 mg capsule once each morning
  - Do not take Qsymia 3.75 mg/23 mg and Qsymia 7.5/46 mg capsules together
- If an increase in Qsymia dose is prescribed, advise patients to increase the dose of Qsymia as follows:
  - Take one Qsymia 11.25 mg/69 mg capsule once each morning for 14 days
  - After the 14 days, take one Qsymia 15 mg/92 mg capsule once each morning
  - Do not take Qsymia 11.25 mg/69 mg and Qsymia 15 mg/92 mg capsules together
- Advise patients NOT to stop Qsymia without talking with their healthcare provider as serious side effects such as seizures may occur.

### Additional information and tools

Additional information and tools can be found at [www.QsymiaREMS.com](http://www.QsymiaREMS.com)

- *Risk of Birth Defects with Qsymia* patient brochure
- Qsymia Prescribing Information
- Qsymia Medication Guide

**For more information about Qsymia, contact VIVUS Medical Information at 1-888-998-4887 or visit [www.Qsymia.com](http://www.Qsymia.com).**

**For more information on the Qsymia REMS or pharmacy enrollment, contact the Qsymia REMS Pharmacy Support Center at 1-855-302-6698 or visit [www.QsymiaREMS.com](http://www.QsymiaREMS.com).**

## Important Safety Information

Qsymia<sup>®</sup> is contraindicated in pregnancy; in patients with glaucoma; in hyperthyroidism; in patients receiving treatment or within 14 days following treatment with monoamine oxidase inhibitors (MAOIs); or in patients with hypersensitivity or idiosyncrasy to sympathomimetic amines, topiramate, or any of the inactive ingredients in Qsymia.

Qsymia can cause fetal harm. Patients of reproductive potential should have a pregnancy test before treatment and monthly thereafter and use effective contraception consistently during Qsymia therapy. If a patient becomes pregnant while taking Qsymia, treatment should be discontinued immediately, and the patient should be informed of the potential hazard to the fetus.

Topiramate, a component of Qsymia, increases the risk of suicidal thoughts or behavior in patients taking these drugs for any indication. Patients should be monitored for the emergence or worsening of depression, suicidal thoughts or behavior, and/or any unusual changes in mood or behavior. Discontinue Qsymia in patients who experience suicidal thoughts or behaviors. Qsymia is not recommended in patients with a history of suicidal attempts or active suicidal ideation.

Acute angle closure glaucoma has been reported in patients treated with topiramate, a component of Qsymia. Symptoms include acute onset of decreased visual acuity and/or eye pain. Symptoms typically occur within 1 month of initiating treatment with topiramate but may occur at any time during therapy. The primary treatment to reverse symptoms is immediate discontinuation of Qsymia.

Visual field defects (independent of elevated intraocular pressure) have been reported in clinical trials and in postmarketing experience in patients receiving topiramate. In clinical trials, most of these events were reversible after topiramate discontinuation.

Qsymia can cause mood disorders, including depression, and anxiety, as well as insomnia. Qsymia can cause cognitive dysfunction (e.g., impairment of concentration/attention, difficulty with memory, and speech or language problems, particularly word-finding difficulties). Since Qsymia has the potential to impair cognitive function, patients should be cautioned about operating hazardous machinery, including automobiles.

Hyperchloremic, non-anion gap, metabolic acidosis has been reported in patients treated with Qsymia. If metabolic acidosis develops and persists, consideration should be given to reducing the dose or discontinuing Qsymia.

Qsymia can cause an increase in serum creatinine. If persistent elevations in creatinine occur while taking Qsymia, reduce the dose or discontinue Qsymia.

Qsymia can cause slowing of linear growth. Consider dosage reduction or discontinuation if pediatric patients are not growing or gaining height as expected.

Qsymia can cause serious skin reactions and should be discontinued at the first sign of a rash, unless the rash is clearly not drug-related.

The most commonly observed side effects in controlled clinical studies,  $\geq 5\%$  and at least 1.5 times placebo, include paraesthesia, dizziness, dysgeusia, insomnia, constipation, and dry mouth.

To report negative side effects, contact VIVUS LLC at 1-888-998-4887 or FDA at 1-800-FDA-1088 or [www.fda.gov/medwatch](http://www.fda.gov/medwatch).

## Confirm Understanding through the Knowledge Assessment

### Completing the Qsymia REMS Pharmacy Training

Confirm that you've read through and understand the Qsymia Pharmacy Training by completing the Knowledge Assessment questions and required Pharmacy Enrollment Form.

Knowledge assessment questions (choose True or False):		True	False
--	--	------	-------

**1**

The major risk for patients of reproductive potential (PRP) is that of embryo-fetal toxicity, including but not limited to the risk of cleft lip with or without cleft palate and of being small for gestational age.

**2**

If a patient thinks they are pregnant, they should continue taking Qsymia until the pregnancy is confirmed

**3**

The Qsymia REMS specifically prohibits certified pharmacies from redistributing, transferring, loaning, or reselling Qsymia to another pharmacy distributor.

**4**

The Medication Guide and patient brochure *Risk of Birth Defects with Qsymia* should be dispensed only with new prescriptions.

**5**

Qsymia is not available outside the network of certified pharmacies.

## Pharmacy Knowledge Assessment Answers

1 of 5

**True or False:** The major risk for patients of reproductive potential (PRP) is that of embryo-fetal toxicity, including but limited to the risk of cleft lip with or without cleft palate and of being small for gestational age.

**The correct answer is TRUE**

The major risk for patients of reproductive potential (PRP) is that of embryo-fetal toxicity, including but not limited to the risk of cleft lip with or without cleft palate and of being small for gestational age.

2 of 5

**True or False:** If a patient thinks they are pregnant, they should continue taking Qsymia until the pregnancy is confirmed.

**The correct answer is FALSE**

If a patient believes they might be pregnant, they should stop taking Qsymia immediately and contact their healthcare provider.

3 of 5

**True or False:** The Qsymia REMS specifically prohibits certified pharmacies from reselling or redistributing Qsymia to another pharmacy or distributor.

**The correct answer is TRUE**

To be eligible for initial certification, and to maintain ongoing certification, pharmacies must agree and abide by the requirement that they not redistribute, transfer, loan, or resell Qsymia to any other pharmacy, distributor, physician's office, or any other location. Qsymia is only available through the network of certified pharmacies.

4 of 5

**True or False:** The Medication Guide and patient brochure *Risk of Birth Defects with Qsymia* should be dispensed only with new prescriptions.

**The correct answer is FALSE**

A Medication Guide and patient brochure *Risk of Birth Defects with Qsymia* must be provided to the patient each time Qsymia is dispensed, whether the prescription being filled is a new prescription or a refill. This is a condition of certification, and systems must be in place to remind the pharmacist of this requirement each time they dispense a prescription for Qsymia.

## Pharmacy Knowledge Assessment Answers (Continued)

5 of 5

**True or False:** Qsymia is not available outside the network of certified pharmacies

The correct answer is **FALSE**

Qsymia is only available through the network of certified pharmacies

**MEDICATION GUIDE**  
**QSYMIA® (Kyoo sim ee uh)**  
**(phentermine and topiramate extended-release capsules)**  
**for oral use, CIV**

**What is the most important information I should know about QSYMIA?**

**QSYMIA can cause serious side effects, including:**

- **Birth defects.** If you take QSYMIA during pregnancy, your baby has a higher risk for birth defects including cleft lip and cleft palate. Your baby may also be smaller than expected at birth. The long-term effects of this are not known. These defects can begin early in pregnancy, even before you know you are pregnant.

**Patients who are pregnant must not take QSYMIA.**

**Patients who can become pregnant should:**

1. Have a pregnancy test before taking QSYMIA and every month while taking QSYMIA.
2. Use effective birth control (contraception) consistently while taking QSYMIA. Talk to your health care provider about how to prevent pregnancy.

**If you become pregnant while taking QSYMIA, stop taking QSYMIA immediately and tell your health care provider right away.** Health care providers and patients who become pregnant should report all cases of pregnancy to:

- FDA MedWatch at 1-800-FDA-1088

**Because of the risk for birth defects (cleft lip and cleft palate), QSYMIA is available through a restricted program called the QSYMIA Risk Evaluation and Mitigation Strategy (REMS).** QSYMIA is only available through certified pharmacies that participate in the QSYMIA REMS program. Your health care provider can give you information about how to find a certified pharmacy. For more information, go to [www.QSYMIAREMS.com](http://www.QSYMIAREMS.com) or call 1-888-998-4887.

- **Suicidal thoughts or actions.** Topiramate, an ingredient in QSYMIA, may cause you to have suicidal thoughts or actions.

**Call your health care provider right away if you have any of these symptoms, especially if they are new, worse, or worry you:**

- thoughts about suicide or dying
- attempts to commit suicide
- new or worse depression
- new or worse anxiety
- feeling agitated or restless
- panic attacks
- trouble sleeping (insomnia)
- new or worse irritability
- acting aggressive, being angry, or violent
- acting on dangerous impulses
- an extreme increase in activity and talking (mania)
- other unusual changes in behavior or mood

**Do not stop QSYMIA without first talking to a health care provider.**

- Stopping QSYMIA suddenly can cause serious problems.
- Suicidal thoughts or actions can be caused by things other than medicines. If you have suicidal thoughts or actions, your health care provider may check for other causes.

**How can I watch for early symptoms of suicidal thoughts and actions?**

- Pay attention to any changes, especially sudden changes in mood, behaviors, thoughts, or feelings.
- Keep all follow-up visits with your health care provider as scheduled.
- Call your health care provider between visits as needed, especially if you are worried about symptoms.

- **Serious eye problems** which include:

- any sudden decrease in vision, with or without eye pain and redness,
- a blockage of fluid in the eye causing increased pressure in the eye (secondary angle closure glaucoma).

**These problems can lead to permanent vision loss if not treated.** Tell your health care provider right away if you have any new eye symptoms.

QSYMIA can have other serious side effects. See **“What are the possible side effects of QSYMIA?”**

**What is QSYMIA?**

- QSYMIA is a prescription medicine that contains phentermine and topiramate extended-release. QSYMIA may help adults and children 12 years and older with obesity, or some adults with overweight who also have weight-related

medical problems, to help them lose excess body weight and keep the weight off.

- QSYMIA should be used with a reduced calorie diet and increased physical activity.
- It is not known if QSYMIA changes your risk of heart problems or stroke or of death due to heart problems or stroke.
- It is not known if QSYMIA is safe and effective when taken with other prescription and over-the-counter medicines, or herbal weight loss products.
- It is not known if QSYMIA is safe and effective in children under 12 years old.
- QSYMIA is a federally controlled substance (CIV) because it contains phentermine and can be abused or lead to drug dependence. Keep QSYMIA in a safe place, to protect it from theft. Never give your QSYMIA to anyone else, because it may cause death or harm them. Selling or giving away QSYMIA is against the law.

**Who should not take QSYMIA? Do not take QSYMIA if you:**

- are pregnant, planning to become pregnant, or become pregnant during QSYMIA treatment.
- have glaucoma.
- have thyroid problems (hyperthyroidism).
- are taking certain medicines called monoamine oxidase inhibitors (MAOIs) or have taken MAOIs in the past 14 days.
- are allergic to topiramate, sympathomimetic amines such as phentermine, or any of the ingredients in QSYMIA. See the end of this Medication Guide for a complete list of ingredients in QSYMIA.

**Before taking QSYMIA, tell your health care provider about all of your medical conditions, including if you:**

- have or have had depression, mood problems, or suicidal thoughts or behavior.
- have eye problems, especially glaucoma. See “**Who should not take QSYMIA?**”
- have a history of too much acid in the blood (metabolic acidosis) or a condition that puts you at higher risk for metabolic acidosis such as
  - chronic diarrhea, surgery, a diet high in fat and low in carbohydrates (ketogenic diet), weak, brittle, or soft bones (osteoporosis, osteomalacia (rickets), osteopenia), or decreased bone density.
- have kidney problems, kidney stones, or are getting kidney dialysis.
- have liver problems.
- have seizures or convulsions (epilepsy).
- are breastfeeding or plan to breastfeed. QSYMIA can pass into your breast milk and may harm your baby. You and your health care provider should decide if you will take QSYMIA or breastfeed. You should not do both.

**Tell your health care provider about all the medicines you take**, including prescription and over-the-counter medicines, vitamins, and herbal supplements. QSYMIA taken with other medicines may affect how each medicine works and may cause side effects.

**Especially tell your health care provider if you take:**

- **Birth control pills.** Tell your health care provider if your menstrual bleeding changes while you are taking birth control pills that contain both estrogen and progestin (combination oral contraceptives) and QSYMIA.
- **Water pills** (diuretics) such as hydrochlorothiazide (HCTZ).
- **Any medicines that impair or decrease your thinking, concentration, or muscle coordination.**
- **Carbonic anhydrase inhibitors** such as ZONEGRAN (zonisamide), DIAMOX (acetazolamide) or NEPTAZANE (methazolamide).
- **Seizure medicines** such as Valproic acid (DEPAKENE or DEPAKOTE).

Ask your health care provider or pharmacist for a list of these medicines, if you are not sure.

Know the medicines you take. Keep a list of them to show your health care provider and pharmacist each time you get a new medicine. **Do not** start a new medicine without talking to your health care provider.

**How should I take QSYMIA?**

- Your health care provider should start you on a diet and exercise program when you start taking QSYMIA. Stay on this program while you are taking QSYMIA.
- Take QSYMIA exactly as your health care provider tells you to take it.
- **Do not** change your dose without talking to your health care provider.
- Take QSYMIA daily in the morning.
- QSYMIA can be taken with or without food.
- If you miss a dose of QSYMIA, wait until the next morning to take your usual dose of QSYMIA. **Do not** double your dose.
- **To start treatment with QSYMIA**
  - Take 1 **QSYMIA 3.75 mg (phentermine)/23 mg (topiramate) capsule** (Figure A) 1 time each morning for the first 14 days.
  - After taking QSYMIA 3.75 mg/23 mg capsule for 14 days, then take 1 **QSYMIA 7.5 mg/46 mg capsule** (Figure B) 1 time each morning.
- **After taking QSYMIA for 12 weeks**
  - Your health care provider may tell you to increase your dose of QSYMIA if you do not lose a certain amount of

weight or do not have a certain decrease in BMI for children 12 years and older, within the **first** 12 weeks of treatment at the recommended dose.

- **If your health care provider increases the dose of QSYMIA**

- Take 1 **QSYMIA 11.25 mg/69 mg capsule** (Figure C) 1 time each morning for 14 days.
- After taking 14 days of QSYMIA 11.25 mg/69 mg capsule, then take 1 **QSYMIA 15 mg/92 mg capsule** (Figure D) 1 time each morning.

- **Stopping QSYMIA treatment**

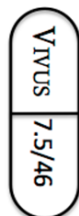
Your health care provider should tell you to stop taking QSYMIA if you have not lost a certain amount of weight or do not have a certain decrease in BMI for children 12 years and older, after an **additional** 12 weeks of treatment on the higher dose.

**Do not** stop taking QSYMIA without talking to your health care provider. **Stopping QSYMIA suddenly can cause serious problems, such as seizures.** Your health care provider will tell you how to stop taking QSYMIA slowly.



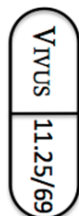
**Figure A**

QSYMIA (3.75 mg/23 mg)  
Cap and body are purple with white printing



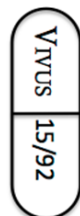
**Figure B**

QSYMIA (7.5 mg/46 mg)  
Cap is purple with white printing and the body is yellow with black printing



**Figure C**

QSYMIA (11.25 mg/69 mg)  
Cap and body are yellow with black printing



**Figure D**

QSYMIA (15 mg/92 mg)  
Cap is yellow with black printing and the body is white with black printing

If you take too much QSYMIA, call your health care provider or Poison Help line at 1-800-222-1222 or go to the nearest emergency room right away.

#### **What should I avoid while taking QSYMIA?**

- **Do not get pregnant while taking QSYMIA.** See “What is the most important information I should know about QSYMIA.”
- **Do not drink too much alcohol while taking QSYMIA.** QSYMIA and alcohol can affect each other causing side effects such as sleepiness or dizziness.
- **Do not drive a car, operate heavy machinery, or do other dangerous activities until you know how QSYMIA affects you.** QSYMIA can slow your thinking and motor skills and may affect vision.

#### **What are the possible side effects of QSYMIA?**

**QSYMIA can cause serious side effects, including:**

- See “What is the most important information I should know about QSYMIA?”
- **Mood changes and trouble sleeping.** QSYMIA may cause depression or mood problems, and trouble sleeping. Tell your health care provider if symptoms occur.
- **Concentration, memory, and speech difficulties.** QSYMIA may affect how you think and cause confusion, problems with concentration, attention, memory, or speech. Tell your health care provider if symptoms occur.
- **Slowing of growth.** QSYMIA may slow the increase in height in children 12 years and older, when used for a long time.
- **Increases of acid in bloodstream (metabolic acidosis).** If left untreated, metabolic acidosis can cause brittle or soft bones (osteoporosis, osteomalacia (rickets), osteopenia), kidney stones, can slow the rate of growth in children, and may possibly harm your baby if you are pregnant. Metabolic acidosis can happen with or without symptoms. Sometimes people with metabolic acidosis will:
  - feel tired
  - not feel hungry (loss of appetite)
  - feel changes in heartbeat
  - have trouble thinking clearlyYour health care provider should do a blood test to measure the level of acid in your blood before and during your treatment with QSYMIA.
- **Decrease in kidney function.** QSYMIA may cause a decrease in kidney function. Your health care provider should do a blood test to measure your kidney function before and during treatment with QSYMIA.
- **Possible seizures if you stop taking QSYMIA too fast.** Seizures may happen in people who may or may not have had seizures in the past if you stop QSYMIA too fast. Your health care provider will tell you how to stop taking QSYMIA slowly.
- **Kidney stones.** Drink plenty of fluids when taking QSYMIA to help decrease your chances of getting kidney stones. If you get severe side or back pain, or blood in your urine, call your health care provider.

- **Decreased sweating and increased body temperature (fever).** People should be watched for signs of decreased sweating and fever, especially in hot temperatures. Some people may need to be hospitalized for this condition.
- **Low potassium.** QSYMIA can increase your risk of low potassium levels. Your health care provider should do a blood test to measure the level of potassium in your blood before and during treatment with QSYMIA.
- **Serious skin reactions.** QSYMIA may cause a severe rash with blisters and peeling skin, especially around the mouth, nose, eyes, and genitals (Stevens-Johnson Syndrome). QSYMIA may also cause a rash with blisters and peeling skin over much of the body that may cause death (Toxic Epidermal Necrolysis). Call your health care provider right away if you develop a skin rash or blisters.
- **Allergic reaction to FD&C Yellow No. 5.** QSYMIA capsules contain the inactive ingredient FD&C Yellow No. 5 (tartrazine) which can cause allergic-type reactions (including bronchial asthma) in certain people, especially people who also have an allergy to aspirin.

**Common side effects of QSYMIA in adults include:**

- numbness or tingling in the hands, arms, feet, or face (paraesthesia)
- dizziness
- change in the way foods taste or loss of taste (dysgeusia)
- trouble sleeping (insomnia)
- constipation
- dry mouth

**Common side effects of QSYMIA in children 12 years and older include:**

- depression
- dizziness
- joint pain
- fever
- flu
- ankle sprain

Tell your health care provider if you have any side effect that bothers you or does not go away.

These are not all of the possible side effects of QSYMIA. For more information, ask your health care provider or pharmacist.

Call your doctor for medical advice about side effects. You may report side effects to FDA at 1-800-FDA-1088. You can also report side effects to VIVUS at 1-888-998-4887.

**How should I store QSYMIA?**

- Store QSYMIA at room temperature between 68°F to 77°F (20°C to 25°C).
- Keep QSYMIA in a tightly closed container.
- Keep QSYMIA dry and away from moisture.

**Keep QSYMIA and all medicines out of the reach of children.**

**General Information about the safe and effective use of QSYMIA.**

Medicines are sometimes prescribed for purposes other than those listed in a Medication Guide. Do not use QSYMIA for a condition for which it was not prescribed. Do not give QSYMIA to other people, even if they have the same symptoms you have. It may harm them.

You can ask your pharmacist or health care provider for information about QSYMIA that is written for health professionals.

**What are the ingredients in QSYMIA?**

**Active Ingredient:** phentermine hydrochloride and topiramate extended-release.

**Inactive Ingredients:** FD&C Blue #1, FD&C Red #3, FD&C Yellow #5 and #6, ethylcellulose, gelatin, methylcellulose, microcrystalline cellulose, povidone, starch, sucrose, talc, titanium dioxide, and pharmaceutical black and white inks.

Copyright © 2024 VIVUS LLC All rights reserved.

VIVUS LLC  
900 E. Hamilton Ave., Suite 550  
Campbell, CA 95008 USA



US Patent Numbers: 7,056,890; 7,553,818; 7,659,256; 7,674,776; 8,580,298; 8,580,299; 8,895,057; 8,895,058; 9,011,905; and 9,011,906.

QSYMIA is a registered trademark of VIVUS LLC.

This Medication Guide has been approved by the U.S. Food and Drug Administration.

Revised: 09/2024

ME-03-001-

## ***Risk of Birth Defects with Qsymia***<sup>®</sup> **(phentermine and topiramate extended-release capsules), CIV**

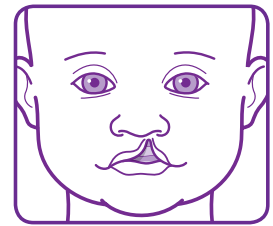
**Please read the following important safety information about the use of Qsymia in patients who can become pregnant.**

You are considered a patient who can become pregnant if this applies to you:

- You have never had a hysterectomy (uterus removed), surgical sterilization (tubes tied), or both ovaries removed and
- You have not gone through menopause. Menopause should be confirmed by your healthcare provider

### **1) Qsymia can increase the risk of birth defects including:**

- Cleft lip and cleft palate (as shown in the picture)
- Your baby may also be smaller than expected at birth; the long-term effects of this are not known
- These defects happen early in pregnancy, sometimes even before you know you are pregnant



**cleft lip**

### **2) You should have a pregnancy test taken BEFORE starting treatment with Qsymia and EVERY MONTH after that while on treatment**

- Talk with your healthcare provider about when and where to have your pregnancy testing performed
- If you have a positive pregnancy test, or you miss a period, or you think you might be pregnant, you must not start Qsymia, or if you are already taking Qsymia, you should stop it immediately and tell your healthcare provider right away

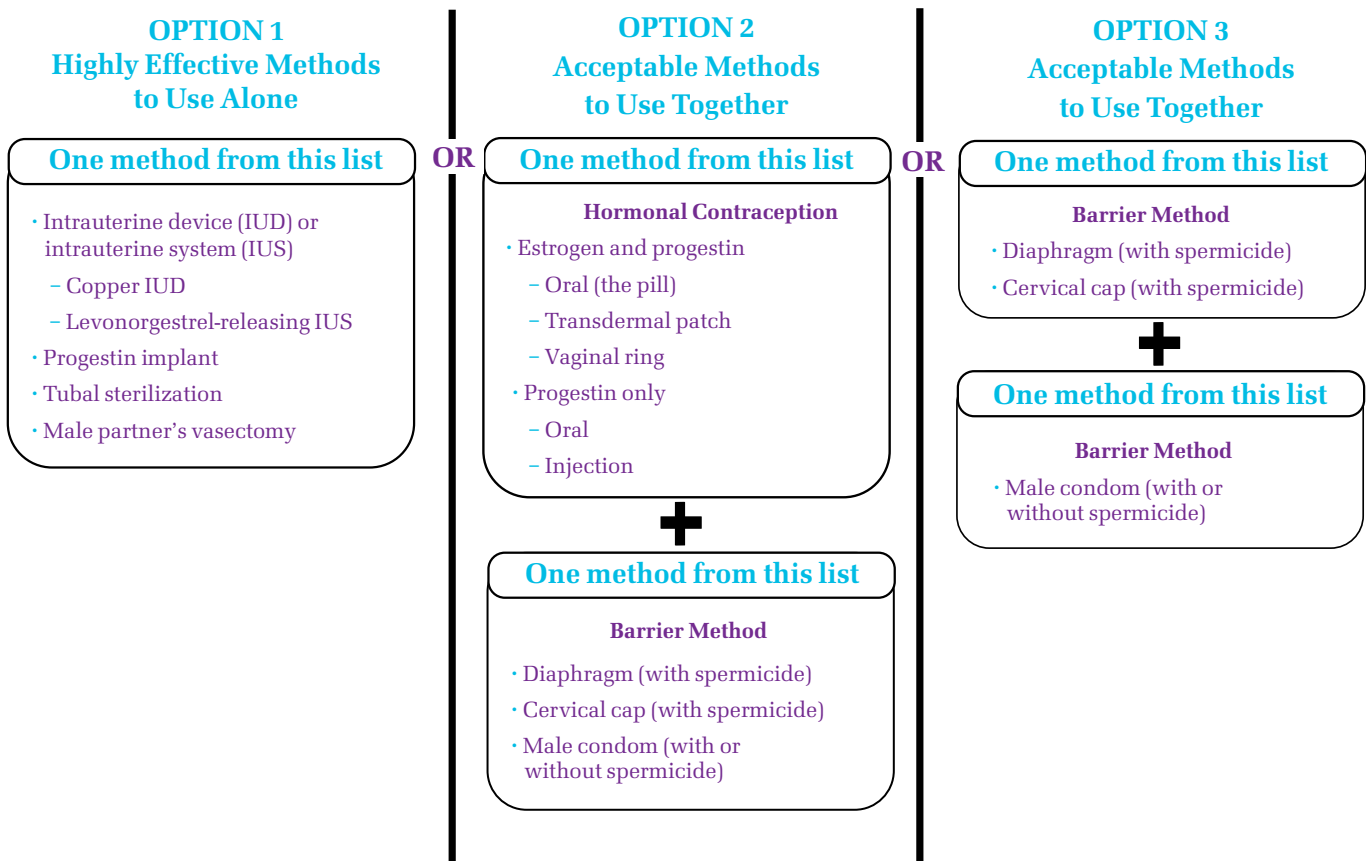
### **3) While you are on Qsymia therapy, you should use effective birth control methods every time you have sex with a male**

- Certain birth control methods are effective when used alone. Other birth control methods are not as effective by themselves, so you should use a second method of birth control

**Talk to your healthcare provider to help decide what birth control options are best for you.**

**Please see the chart on the back to review birth control options.**

## Your Birth Control Options



Keep in mind, even the most effective birth control methods can fail. But your chances of getting pregnant are lowest if the methods you choose are always used correctly and every time you have sex.

Please read the accompanying Qsymia<sup>®</sup> Medication Guide as it contains additional important safety information about your treatment. This information does not take the place of talking to your healthcare provider about your medical condition or treatment. If you have any questions about Qsymia, talk to your healthcare provider or pharmacist, contact VIVUS Medical Information at 1-888-998-4887, or visit the Website [www.QsymiaREMS.com](http://www.QsymiaREMS.com).

## Risk Evaluation and Mitigation Strategy (REMS)

Home

Pharmacy  
Training

Information for  
Pharmacists

Qsymia Certified  
Pharmacy Network

Risk of Birth Defects  
Patient Brochure

### Risk Evaluation and Mitigation Strategy (REMS)

A Risk Evaluation and Mitigation Strategy (REMS) is a strategy to manage known or potential serious risks associated with a drug product and is required by the Food and Drug Administration (FDA) to ensure that the benefits of a drug outweigh its risks. The FDA has required a REMS for Qsymia.

The goal of the Qsymia REMS is to inform certified pharmacies and patients of reproductive potential about the:

- Increased risk of embryo-fetal toxicity with major congenital malformations, including but not limited to cleft lip and/or cleft palate (oral clefts), and of being small for gestational age (SGA) in a fetus exposed to Qsymia during the first trimester of pregnancy
- Importance of pregnancy prevention for patients of reproductive potential receiving Qsymia
- Need to discontinue Qsymia immediately if pregnancy occurs

### Dispensed to Patients Through Certified Pharmacies

Qsymia is available only through certified pharmacies. [Click Here](#) to learn more.

**For assistance, please contact the Qsymia REMS Pharmacy Support Center at 1-855-302-6698**

[Prescribing Information](#)

#### Materials for Patients

[Risk of Birth Defects with Qsymia patient brochure](#)

[Medication Guide](#)

These materials can be downloaded  
and printed.

## Risk Evaluation and Mitigation Strategy (REMS)

Home

Pharmacy  
Training

Information for  
Pharmacists

Qsymia Certified  
Pharmacy Network

Risk of Birth Defects  
Patient Brochure

### Welcome to Qsymia<sup>®</sup> (phentermine and topiramate extended-release capsules) CIV Pharmacy Training

Qsymia REMS Pharmacy Training is designed to provide pharmacists with an understanding of the risks of Qsymia and the pharmacy requirements under the REMS.

Qsymia REMS Pharmacy Training is necessary to dispense Qsymia.

#### Complete the Qsymia REMS Pharmacy Certification in 3 easy steps:

1. Designate an Authorized Representative to carry out the certification process and oversee implementation and compliance with the Qsymia REMS.
2. Read through the entirety of this Qsymia REMS Pharmacy Training and confirm you understand the content by completing the [Knowledge Assessment questions](#).
3. Complete the [Pharmacy Enrollment Form](#) and fax the form to the Qsymia REMS Pharmacy Support Center at 1-855-302-6699 or email the form to [VivusUSREMS.sm@ppd.com](mailto:VivusUSREMS.sm@ppd.com).

[Start Qsymia Pharmacy Training](#)



Download and print Qsymia REMS Pharmacy Training.

**For assistance, please contact the Qsymia REMS Pharmacy Support Center at 1-855-302-6698**

## Risk Evaluation and Mitigation Strategy (REMS)

[Home](#)

[Pharmacy  
Training](#)

[Information for  
Pharmacists](#)

[Qsymia Certified  
Pharmacy Network](#)

[Risk of Birth Defects  
Patient Brochure](#)

Page: 1 of 6

### Indication and Patient Selection

Qsymia is indicated in combination with a reduced-calorie diet and increased physical activity to reduce excess body weight and maintain weight reduction long term in:

- Adults and pediatric patients aged 12 years and older with obesity
- Adults with overweight in the presence of at least one weight-related comorbid condition

#### Limitations of use:

- The effect of Qsymia on cardiovascular morbidity and mortality has not been established.
- The safety and effectiveness of Qsymia in combination with other products intended for weight loss, including prescription drugs, over-the-counter drugs, and herbal preparations, have not been established.

[Next](#)

**For assistance, please contact the Qsymia REMS Pharmacy Support Center at 1-855-302-6698**

## Risk Evaluation and Mitigation Strategy (REMS)

Home

Pharmacy  
Training

Information for  
Pharmacists

Qsymia Certified  
Pharmacy Network

Risk of Birth Defects  
Patient Brochure

Page: 2 of 6

### Increased Risk of Embryo-Fetal Toxicity

- Qsymia is contraindicated in pregnant patients because the use of Qsymia can cause fetal harm and weight loss offers no clear benefit to a pregnant patient
- Available data indicate an increased risk of major congenital malformations, including but not limited to cleft lip and/or cleft palate (oral clefts), and of being small for gestational age (SGA)

#### Studies evaluating the risk of major congenital malformations and/or oral clefts with exposure to topiramate during the first trimester of pregnancy include the following:

- The North American Anti-Epileptic Drug (NAAED) Pregnancy Registry (2010) analysis
- A retrospective observational study using 4 U.S. electronic healthcare databases (FORTRESS)
- A case-control study using data from the Slone Epidemiology Center Birth Defects Study (BDS, 1997-2009) and the Centers for Disease Control's (CDC's) National Birth Defects Prevention Study (NBDPS, 1996-2007)
- The UK Epilepsy and Pregnancy Register

The relative risk of oral clefts in topiramate-exposed pregnancies in the NAAED Pregnancy Registry was 12.5 (95% Confidence Interval [CI] 5.9-26.37) as compared to the risk in a background population of untreated women. The UK Epilepsy and Pregnancy Register reported a prevalence of oral clefts among infants exposed to topiramate monotherapy (3.2%) that was 16 times higher than the background rate in the UK (0.2%). An increase in oral clefts was observed with all dose strengths of topiramate.

These data show that exposure to topiramate in pregnancy is associated with a 2- to 5-fold increase in risk of oral clefts. The FORTRESS study found an excess risk of 1.5 (95% CI = -1.1 to 4.1) oral cleft cases per 1,000 infants exposed to topiramate during the first trimester. Other data sources confirm the increased risk of oral clefts with topiramate exposure during pregnancy (i.e., animal studies and Adverse Event Reporting System data for topiramate).

#### Small for Gestational Age

- Data from the NAAED Pregnancy Registry and population-based birth registry cohort indicate that exposure to topiramate in utero is associated with an increased risk of SGA newborns (birth weight <10th percentile).
- In the NAAED Pregnancy Registry, 19.7% of topiramate-exposed newborns were SGA compared to 7.9% of newborns exposed to a reference AED and 5.4% of newborns of mothers without epilepsy and without AED exposure.
- In the medical Birth Registry of Norway, a population-based pregnancy registry, 25% of newborns in the topiramate monotherapy exposure group were SGA compared to 9% in the comparison group unexposed to AEDs; the long-term consequences of the SGA findings are not known.

Back

Next

**For assistance, please contact the Qsymia REMS Pharmacy Support Center at 1-855-302-6698**

## Risk Evaluation and Mitigation Strategy (REMS)

Home

Pharmacy  
Training

Information for  
Pharmacists

Qsymia Certified  
Pharmacy Network

Risk of Birth Defects  
Patient Brochure

Page: 3 of 6

### Qsymia is Only Available Through Certified Pharmacies

#### To become a certified pharmacy, the Authorized Representative must:

- Carry out the certification process and oversee implementation and compliance with the Qsymia REMS on behalf of the pharmacy
- Complete the Pharmacy Training
- Complete the Pharmacy Enrollment Form and submit it to the Qsymia REMS
- Train all relevant staff involved in dispensing on the risks associated with Qsymia and the requirement to provide the Medication Guide and Risk of Birth Defects with Qsymia patient brochure using the Pharmacy Training
- Establish processes and procedures to provide the Medication Guide and *Risk of Birth Defects with Qsymia* patient brochure to each patient each time the drug is dispensed

#### Before dispensing, all pharmacy staff must:

- Provide the patient with the Medication Guide and the *Risk of Birth Defects with Qsymia* patient brochure through the processes and procedures established as a requirement of the Qsymia REMS

#### At all times, all pharmacy staff must:

- Not distribute, transfer, loan, or sell Qsymia
- Maintain records of standard operating procedures, training, and providing the Medication Guide and the *Risk of Birth Defects with Qsymia* patient brochure
- Maintain and submit annual compliance reports to the Qsymia REMS
- Comply with audits carried out by VIVUS to ensure that all processes and procedures are in place and are being followed
- Have a new Authorized Representative enroll in the Qsymia REMS by completing the Qsymia REMS Pharmacy Training and the [Pharmacy Enrollment Form](#)

***The list of certified pharmacies will be updated within 5 business days after a new pharmacy is certified and eligible to dispense. Prescribers and patients will be able to use a "[Certified Pharmacy Locator](#)" tool to identify certified pharmacies in their area.***

Back

Next

**For assistance, please contact the Qsymia REMS Pharmacy Support Center at 1-855-302-6698**

## Risk Evaluation and Mitigation Strategy (REMS)

Home

Pharmacy  
Training

Information for  
Pharmacists

Qsymia Certified  
Pharmacy Network

Risk of Birth Defects  
Patient Brochure

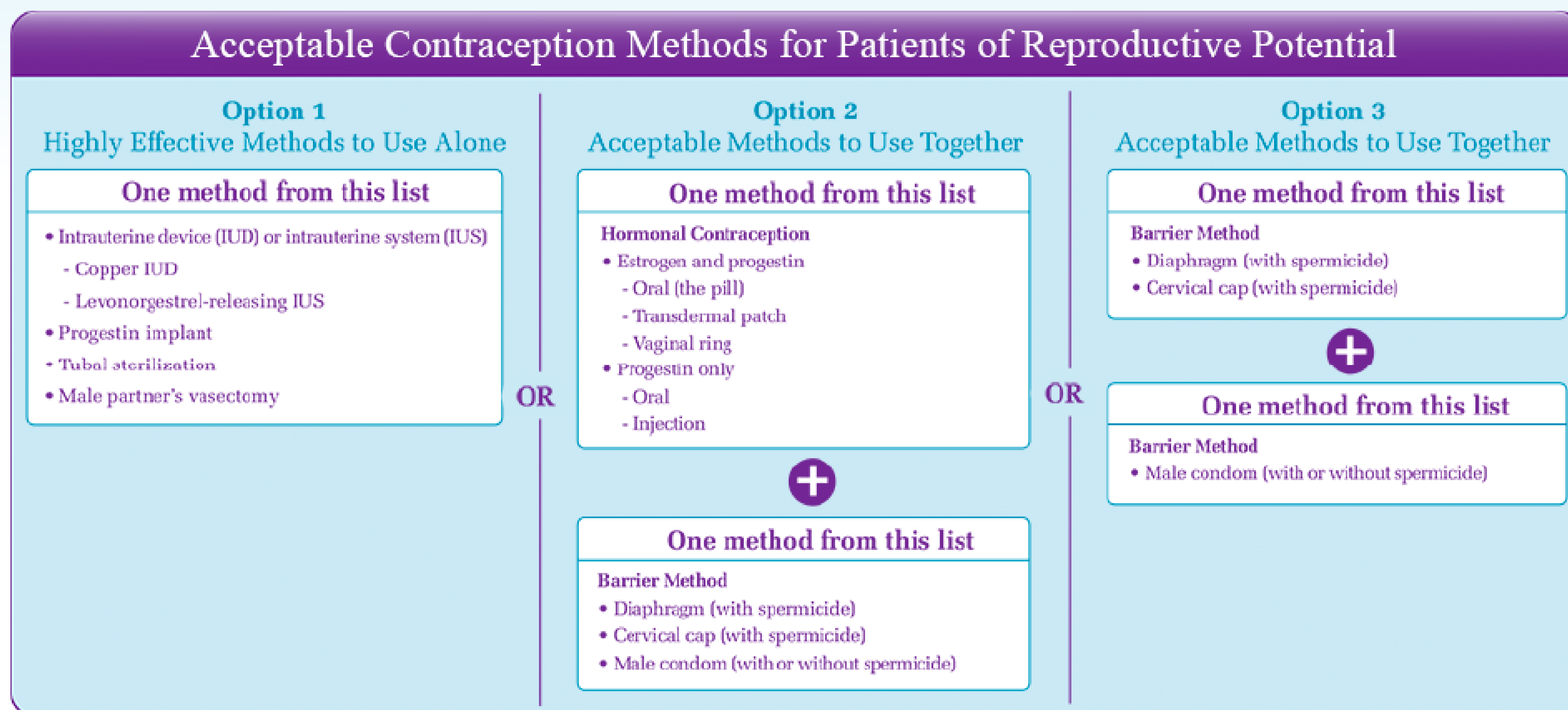
Page: 4 of 6

### Counseling for Patients of Reproductive Potential\*

**Qsymia can cause fetal harm.**

**Advise patients of reproductive potential that labeling recommends:**

- Pregnancy testing prior to beginning Qsymia and monthly during therapy. Specific documentation of the result is not required at the pharmacy level.
- Use of effective contraception consistently during Qsymia therapy because Qsymia can cause certain kinds of birth defects (oral clefts). Even patients who believe they cannot become pregnant should use effective contraception while taking Qsymia due to the potential for increased fertility associated with weight loss.
- If a patient becomes pregnant while taking Qsymia, Qsymia should be discontinued immediately and the patient advised to notify their healthcare provider.



\*Patients of reproductive potential are patients who have NOT had a hysterectomy, bilateral oophorectomy, or medically documented spontaneous ovarian failure, and have not gone through menopause. Menopause should be clinically confirmed by an individual's healthcare provider.

**Advise nursing mothers not to use Qsymia. Qsymia may be present in human milk because topiramate and amphetamines (phentermine has pharmacologic activity and a chemical structure similar to amphetamines) are excreted in human milk.**

Back

Next

**For assistance, please contact the Qsymia REMS Pharmacy Support Center at 1-855-302-6698**

## Risk Evaluation and Mitigation Strategy (REMS)

Home

Pharmacy  
Training

Information for  
Pharmacists

Qsymia Certified  
Pharmacy Network

Risk of Birth Defects  
Patient Brochure

Page: 5 of 6

### Counseling for All Patients

- The Medication Guide and patient brochure contain important information that patients should read and become familiar with.
- Qsymia should be taken in the morning, with or without food.
- Avoid taking Qsymia in the evening due to the possibility of insomnia.
- Advise patients to start treatment with Qsymia as follows:
  - Take one Qsymia capsule (containing 3.75 mg of phentermine and 23 mg of topiramate) once each morning for the first 14 days.
  - After the first 14 days is complete, take one Qsymia 7.5 mg/46 mg capsule once each morning
  - Do not take Qsymia 3.75 mg/23 mg and Qsymia 7.5 mg/46 mg capsules together
- If an increase in Qsymia dose is prescribed after medical evaluation, advise patients to increase the dose of Qsymia as follows:
  - Take one Qsymia 11.25 mg/69 mg capsule once each morning for 14 days
  - After the 14 days is complete, take one Qsymia 15 mg/92 mg capsule once each morning
  - Do not take Qsymia 11.25 mg/69 mg and Qsymia 15 mg/92 mg capsules together
- Advise patients NOT to stop Qsymia without talking with their HCP as serious side effects such as seizures may occur.

### Additional Information and Tools

Additional information and tools can be found at [www.QsymiaREMS.com](http://www.QsymiaREMS.com)

- *Risk of Birth Defects with Qsymia* patient brochure
- Qsymia Prescribing Information
- Qsymia Medication Guide

**For more information on Qsymia, contact VIVUS Medical Information at 1-888-998-4887 or visit [www.Qsymia.com](http://www.Qsymia.com).**

**For more information on the Qsymia REMS, or for information on pharmacy enrollment, contact the Qsymia REMS Pharmacy Support Center at 1-855-302-6698 or visit [www.QsymiaREMS.com](http://www.QsymiaREMS.com).**

Back

Next

**For assistance, please contact the Qsymia REMS Pharmacy Support Center at 1-855-302-6698**

## Risk Evaluation and Mitigation Strategy (REMS)

Home

Pharmacy  
Training

Information for  
Pharmacists

Qsymia Certified  
Pharmacy Network

Risk of Birth Defects  
Patient Brochure

Page: 6 of 6

### Important Safety Information

Qsymia is contraindicated in pregnancy; in patients with glaucoma; in hyperthyroidism; in patients receiving treatment or within 14 days following treatment with monoamine oxidase inhibitors (MAOIs); or in patients with hypersensitivity or idiosyncrasy to sympathomimetic amines, topiramate, or any of the inactive ingredients in Qsymia.

Qsymia can cause fetal harm. Patients of reproductive potential should have a pregnancy test before treatment and monthly thereafter and use effective contraception consistently during Qsymia therapy. If a patient becomes pregnant while taking Qsymia, treatment should be discontinued immediately, and the patient should be informed of the potential hazard to the fetus.

Topiramate increases the risk of suicidal thoughts or behavior in patients taking these drugs for any indication. Patients should be monitored for the emergence or worsening of depression, suicidal thoughts or behavior, and/or any unusual changes in mood or behavior. Discontinue Qsymia in patients who experience suicidal thoughts or behaviors. Qsymia is not recommended in patients with a history of suicidal attempts or active suicidal ideation.

Acute angle closure glaucoma has been reported in patients treated with topiramate. Symptoms include acute onset of decreased visual acuity and/or eye pain. Symptoms typically occur within 1 month of initiating treatment with topiramate but may occur at any time during therapy. The primary treatment to reverse symptoms is immediate discontinuation of Qsymia.

Visual field defects (independent of elevated intraocular pressure) have been reported in clinical trials and in postmarketing experience in patients receiving topiramate. In clinical trials, most of these events were reversible after topiramate discontinuation.

Qsymia can cause mood disorders, including depression, and anxiety, as well as insomnia. Qsymia can cause cognitive dysfunction (e.g., impairment of concentration/attention, difficulty with memory, and speech or language problems, particularly word-finding difficulties). Since Qsymia has the potential to impair cognitive function, patients should be cautioned about operating hazardous machinery, including automobiles.

Hyperchloremic, non-anion gap, metabolic acidosis has been reported in patients treated with Qsymia. If metabolic acidosis develops and persists, consideration should be given to reducing the dose or discontinuing Qsymia.

Qsymia can cause an increase in serum creatinine. If persistent elevations in creatinine occur while taking Qsymia, reduce the dose or discontinue Qsymia.

Qsymia can cause slowing of linear growth. Consider dosage reduction or discontinuation if pediatric patients are not growing or gaining height as expected.

Qsymia can cause serious skin reactions and should be discontinued at the first sign of a rash, unless the rash is clearly not drug-related.

The most commonly observed side effects in controlled clinical studies,  $\geq 5\%$  and at least 1.5 times placebo, include paraesthesia, dizziness, dysgeusia, insomnia, constipation, and dry mouth.

To report negative side effects, contact VIVUS LLC at 1-888-998-4887 or FDA at 1-800-FDA-1088 or [www.fda.gov/medwatch](http://www.fda.gov/medwatch).

Back

**For assistance, please contact the Qsymia REMS Pharmacy Support Center at 1-855-302-6698**

## Risk Evaluation and Mitigation Strategy (REMS)

[Home](#)

[Pharmacy  
Training](#)

[Information for  
Pharmacists](#)

[Qsymia Certified  
Pharmacy Network](#)

[Risk of Birth Defects  
Patient Brochure](#)

### Information for Pharmacists

Qsymia is only available through certified pharmacies. Certified pharmacies must follow the requirements of the Qsymia REMS .

#### Steps for pharmacy certification:

1. Designate an Authorized Representative to carry out the certification process and oversee implementation and compliance with the Qsymia REMS.
2. Read through the entirety of this Qsymia REMS Pharmacy Training and confirm you understand the content by completing the [Knowledge Assessment questions](#).
3. Complete the [Pharmacy Enrollment Form](#) and submit it to the Qsymia REMS.

#### Search for Certified Pharmacies

[Search now.](#)

#### Qsymia REMS Pharmacy Support Center

Phone: 1-855-302-6698

[Prescribing Information](#)

#### Materials for Pharmacists

[Pharmacy Enrollment Form](#)

[Medication Guide](#)

[Risk of Birth Defects with Qsymia patient  
brochure](#)

These materials can be downloaded  
and printed.

**For assistance, please contact the Qsymia REMS Pharmacy Support Center at 1-855-302-6698**

## Risk Evaluation and Mitigation Strategy (REMS)

[Home](#)

[Pharmacy  
Training](#)

[Information for  
Pharmacists](#)

[Qsymia Certified  
Pharmacy Network](#)

[Risk of Birth Defects  
Patient Brochure](#)

### Search for a Certified Pharmacy near you

Enter your zip code to locate a certified pharmacy within 20 miles of your zip code.

Enter your ZIP Code

[Search](#)

**Qsymia is also available by mail order through the Qsymia Home Delivery Network:**

**medvantx**

P: 1-844-777-9642

F: 1-844-678-8444

**Walgreens**

P: 1-877-487-8800

F: 1-800-332-9581

**Walmart**  Pharmacy

P: 1-800-273-3455

F: 1-800-406-8976

**For assistance, please contact the Qsymia REMS Pharmacy Support Center at 1-855-302-6698**

## Risk Evaluation and Mitigation Strategy (REMS)

- Home
- Pharmacy Training
- Information for Pharmacists
- Qsymia Certified Pharmacy Network
- Risk of Birth Defects Patient Brochure

### Search for a Qsymia<sup>®</sup> Certified Pharmacy Retail Location

Sort by:  Distance  Pharmacy Name

[Search Again](#)

**10 Pharmacies near 59718**

<p><b>1</b> <b>COSTCO PHARMACY</b> &lt; 1 mile <a href="#">Directions</a></p> <p>2505 CATRON ST BOZEMAN, MT 59718 Phone: 406-585-7575</p>	<p><b>6</b> <b>COSTCO PHARMACY</b> 2.4 miles <a href="#">Directions</a></p> <p>1525 W MAIN ST BOZEMAN, MT 59715 Phone: 406-587-9252</p>
<p><b>2</b> <b>COSTCO PHARMACY</b> 1.4 miles <a href="#">Directions</a></p> <p>1400 N 19TH AVE BOZEMAN, MT 59718 Phone: 406-586-3550</p>	<p><b>7</b> <b>COSTCO PHARMACY</b> 2.6 miles <a href="#">Directions</a></p> <p>200 S 23RD AVE BOZEMAN, MT 59718 Phone: 406-587-8800</p>
<p><b>3</b> <b>COSTCO PHARMACY</b> 1.8 miles <a href="#">Directions</a></p> <p>1500 N 7TH AVE BOZEMAN, MT 59715 Phone: 406-585-8753</p>	<p><b>8</b> <b>COSTCO PHARMACY</b> 4.0 miles <a href="#">Directions</a></p> <p>925 HIGHLAND BLVD STE 2000 BOZEMAN, MT 59715 Phone: 406-585-5030</p>
<p><b>4</b> <b>COSTCO PHARMACY</b> 2.0 mile <a href="#">Directions</a></p> <p>1126 N 7TH AVE BOZEMAN, MT 59715 Phone: 406-587-8570</p>	<p><b>9</b> <b>COSTCO PHARMACY</b> 6.9 miles <a href="#">Directions</a></p> <p>6999 JACKRABBIT LN BELGRADE, MT 59714 Phone: 406-388-1696</p>
<p><b>5</b> <b>COSTCO PHARMACY</b> 2.1 miles <a href="#">Directions</a></p> <p>910 N. 7th Ave. Bozeman, MT 59715 Phone: 406-587-0608</p>	<p><b>10</b> <b>COSTCO PHARMACY</b> &lt; 24.4 miles <a href="#">Directions</a></p> <p>2120 PARK ST S LIVINGSTON, MT 59047 Phone: 406-222-1188</p>
<a href="#">&lt; Previous</a>	<a href="#">Next &gt;</a>

For assistance, please contact the Qsymia REMS Pharmacy Support Center at 1-855-302-6698

## Confirm Understanding through the Knowledge Assessment

### Completing the Qsymia REMS Pharmacy Training

Confirm that you've read through and understand the Qsymia Pharmacy Training by completing the Knowledge Assessment questions and required Pharmacy Enrollment Form.

### Knowledge assessment questions (choose True or False):

- |   | True                     | False                    |
|---|--------------------------|--------------------------|
| 1 The major risk for patients of reproductive potential (PRP) is that of embryo-fetal toxicity, including but not limited to the risk of cleft lip with or without cleft palate and of being small for gestational age. | <input type="checkbox"/> | <input type="checkbox"/> |
| 2 If a patient thinks they are pregnant, they should continue taking Qsymia until the pregnancy is confirmed.   | <input type="checkbox"/> | <input type="checkbox"/> |
| 3 The Qsymia REMS specifically prohibits certified pharmacies from redistributing, transferring, loaning, or reselling Qsymia to another pharmacy or distributor.   | <input type="checkbox"/> | <input type="checkbox"/> |
| 4 The Medication Guide and patient brochure <i>Risk of Birth Defects with Qsymia</i> should be dispensed only with new prescriptions.   | <input type="checkbox"/> | <input type="checkbox"/> |
| 5 Qsymia is not available outside the network of certified pharmacies.  | <input type="checkbox"/> | <input type="checkbox"/> |

## Pharmacy Knowledge Assessment Answers

1 of 5

**True or False:** The major risk for patients of reproductive potential (PRP) is that of embryo-fetal toxicity, including but limited to the risk of cleft lip with or without cleft palate and of being small for gestational age.

**The correct answer is TRUE.**

The major risk for patients of reproductive potential (PRP) is that of embryo-fetal toxicity, including but not limited to the risk of cleft lip with or without cleft palate and of being small for gestational age.

2 of 5

**True or False:** If a patient thinks they are pregnant, they should continue taking Qsymia until the pregnancy is confirmed.

**The correct answer is FALSE.**

If a patient believes they might be pregnant, they should stop taking Qsymia immediately and contact their healthcare provider.

3 of 5

**True or False:** The Qsymia REMS specifically prohibits certified pharmacies from reselling or redistributing Qsymia to another pharmacy or distributor.

**The correct answer is TRUE.**

To be eligible for initial certification, and to maintain ongoing certification, pharmacies must agree and abide by the requirement that they not redistribute, transfer, loan, or resell Qsymia to any other pharmacy, distributor, physician's office, or any other location. Qsymia is only available through the network of certified pharmacies.

4 of 5

**True or False:** The Medication Guide and patient brochure *Risk of Birth Defects with Qsymia* should be dispensed only with new prescriptions.

**The correct answer is FALSE.**

A Medication Guide and patient brochure *Risk of Birth Defects with Qsymia* must be provided to the patient each time Qsymia is dispensed, whether the prescription being filled is a new prescription or a refill. This is a condition of certification, and systems must be in place to remind the pharmacist of this requirement each time they dispense a prescription for Qsymia.

## Pharmacy Knowledge Assessment Answers (Continued)

5 of 5

**True or False:** Qsymia is not available outside the network of certified pharmacies.

**The correct answer is TRUE.**  
Qsymia is only available through the network of certified pharmacies.