



## POLICY & PRACTICE

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### FDA Sends Warning to Merck

The U.S. Food and Drug Administration sent a warning letter to drug maker Merck, because the company failed to meet the deadline for completing a postmarketing study of sitagliptin (Januvia) and sitagliptin/metformin (Janumet). As a result, the agency wrote Merck, “your product is considered misbranded.” Merck had committed to conducting a 3-month pancreatic safety study in rodents to assess the risk of acute pancreatitis associated with sitagliptin. “Failure to promptly correct this violation may result in regulatory action by the FDA without further notice,” the agency wrote in its warning letter. Such actions could include civil financial penalties, and additional penalties if the violation is not corrected, the agency warned. In a statement, Merck officials said they would submit the final protocol for the rodent study within 30 days of the warning letter, and will start the study within 6 months.

### ADA Applauds Funding

The Centers for Disease Control and Prevention received \$10 million in funding from the U.S. Department of Health and Human Services for Fiscal Year 2012 to administer the National Diabetes Prevention Program, a national network of lifestyle intervention programs based on Diabetes Prevention Program clinical trial. In a statement, the American Diabetes Association applauded the funding. “Expansion of the National Diabetes Prevention Program will allow more Americans with prediabetes to participate in a proven program to lower their risk for type 2 diabetes and its dangerous complications,” said L. Hunter Limbaugh, Chair of the Board of the ADA, in a statement. But they expressed concern about President Obama’s Fiscal Year 2013 budget. “The Association is concerned that the Administration’s Budget does not provide adequate resources to continue the nation’s investment in diabetes prevention and research at National Institutes of Health and the [CDC], both of which are critically important to addressing the diabetes epidemic.

### Entity Promotes Collaborative Care

Six national health profession organizations have created the Interprofessional

Education Collaborative, or IPEC, in an effort to create a more collaborative and patient-centered care environment. The stand-alone collaborative aims to advance interprofessional education around the nation, and is planning to share information on best practices and collaborative practice innovation. “Better patient care depends on all members of the health care

team understanding each other’s roles and knowing how to work together effectively,” said Dr. Darrell G. Kirch, president and CEO of Association of American Medical Colleges, one of the founding members of IPEC, in a statement.

### Health IT Progress Report

At least 2,000 hospitals and 41,000 physicians have received \$3.1 billion in incentive payments from the Health and Human Services department for certifying meaningful use of health information technology, the department said in a report. The American Hospital Association

surveyed its members and found that 35% of hospitals were using electronic health records in 2011, up from 16% in 2009. Seven states had a significantly higher level of adoption, compared with the national average, of at least a basic electronic health record: Florida, Illinois, Massachusetts, Minnesota, Missouri, Virginia, and Wisconsin. The Centers for Medicare and Medicaid Services had compiled data showing that enrollment in incentive programs is increasing. In January, the agency provided \$519 million to eligible providers.

—Naseem S. Miller

#### NovoLog® (insulin aspart [rDNA origin] injection)

##### Rx only

**BRIEF SUMMARY.** Please consult package insert for full prescribing information.

**INDICATIONS AND USAGE: Treatment of Diabetes Mellitus:** NovoLog® is an insulin analog indicated to improve glycemic control in adults and children with diabetes mellitus.

**CONTRAINDICATIONS:** NovoLog® is contraindicated during episodes of hypoglycemia and in patients with hypersensitivity to NovoLog® or one of its excipients.

**WARNINGS AND PRECAUTIONS: Administration:** NovoLog® has a more rapid onset of action and a shorter duration of activity than regular human insulin. An injection of NovoLog® should immediately be followed by a meal within 5-10 minutes. Because of NovoLog®’s short duration of action, a longer acting insulin should also be used in patients with type 1 diabetes and may also be needed in patients with type 2 diabetes. Glucose monitoring is recommended for all patients with diabetes and is particularly important for patients using external pump infusion therapy. Any change of insulin dose should be made cautiously and only under medical supervision. Changing from one insulin product to another or changing the insulin strength may result in the need for a change in dosage. As with all insulin preparations, the time course of NovoLog® action may vary in different individuals or at different times in the same individual and is dependent on many conditions, including the site of injection, local blood supply, temperature, and physical activity. Patients who change their level of physical activity or meal plan may require adjustment of insulin dosages. Insulin requirements may be altered during illness, emotional disturbances, or other stresses. Patients using continuous subcutaneous insulin infusion pump therapy must be trained to administer insulin by injection and have alternate insulin therapy available in case of pump failure. **Needles and NovoLog® FlexPen® must not be shared. Hypoglycemia:** Hypoglycemia is the most common adverse effect of all insulin therapies, including NovoLog®. Severe hypoglycemia may lead to unconsciousness and/or convulsions and may result in temporary or permanent impairment of brain function or death. Severe hypoglycemia requiring the assistance of another person and/or parenteral glucose infusion or glucagon administration has been observed in clinical trials with insulin, including trials with NovoLog®. The timing of hypoglycemia usually reflects the time-action profile of the administered insulin formulations. Other factors such as changes in food intake (e.g., amount of food or timing of meals), injection site, exercise, and concomitant medications may also alter the risk of hypoglycemia. As with all insulins, use caution in patients with hypoglycemia unawareness and in patients who may be predisposed to hypoglycemia (e.g., patients who are fasting or have erratic food intake). The patient’s ability to concentrate and react may be impaired as a result of hypoglycemia. This may present a risk in situations where these abilities are especially important, such as driving or operating other machinery. Rapid changes in serum glucose levels may induce symptoms of hypoglycemia in persons with diabetes, regardless of the glucose value. Early warning symptoms of hypoglycemia may be different or less pronounced under certain conditions, such as longstanding diabetes, diabetic nerve disease, use of medications such as beta-blockers, or intensified diabetes control. These situations may result in severe hypoglycemia (and, possibly, loss of consciousness) prior to the patient’s awareness of hypoglycemia. Intravenously administered insulin has a more rapid onset of action than subcutaneously administered insulin, requiring more close monitoring for hypoglycemia. **Hypokalemia:** All insulin products, including NovoLog®, cause a shift in potassium from the extracellular to intracellular space, possibly leading to hypokalemia that, if left untreated, may cause respiratory paralysis, ventricular arrhythmia, and death. Use caution in patients who may be at risk for hypokalemia (e.g., patients using potassium-lowering medications, patients taking medications sensitive to serum potassium concentrations, and patients receiving intravenously administered insulin). **Renal Impairment:** As with other insulins, the dose requirements for NovoLog® may be reduced in patients with renal impairment. **Hepatic Impairment:** As with other insulins, the dose requirements for NovoLog® may be reduced in patients with hepatic impairment. **Hypersensitivity and Allergic Reactions: Local Reactions** – As with other insulin therapy, patients may experience redness, swelling, or itching at the site of NovoLog® injection. These reactions usually resolve in a few days to a few weeks, but in some occasions, may require discontinuation of NovoLog®. In some instances, these reactions may be related to factors other than insulin, such as irritants in a skin cleansing agent or poor injection technique. Localized reactions and generalized myalgias have been reported with injected metacresol, which is an excipient in NovoLog®. **Systemic Reactions** – Severe, life-threatening, generalized allergy, including anaphylaxis, may occur with any insulin product, including NovoLog®. Anaphylactic reactions with NovoLog® have been reported post-approval. Generalized allergy to insulin may also cause whole body rash (including pruritus), dyspnea, wheezing, hypotension, tachycardia, or diaphoresis. In controlled clinical trials, allergic reactions were reported in 3 of 735 patients (0.4%) treated with regular human insulin and 10 of 1394 patients (0.7%) treated with NovoLog®. In controlled and uncontrolled clinical trials, 3 of 2341 (0.1%) NovoLog®-treated patients discontinued due to allergic reactions. **Antibody Production:** Increases in anti-insulin antibody titers that react with both human insulin and insulin aspart have been observed in patients treated with NovoLog®. Increases in anti-insulin antibodies are observed more frequently with NovoLog® than with regular human insulin. Data from a 12-month controlled trial in patients with type 1 diabetes suggest that the increase in these antibodies is transient, and the differences in antibody levels between the regular human insulin and insulin aspart treatment groups observed at 3 and 6 months were no longer evident at 12 months. The clinical significance of these antibodies is not known. These antibodies do not appear to cause deterioration in glycemic control or necessitate increases in insulin dose. **Mixing of Insulins:** Mixing NovoLog® with NPH human insulin immediately before injection attenuates the peak concentration of NovoLog®, without significantly affecting the time to peak concentration or total bioavailability of NovoLog®. If NovoLog® is mixed with NPH human insulin, NovoLog® should be drawn into the syringe first, and the mixture should be injected immediately after mixing. The efficacy and safety of mixing NovoLog® with insulin preparations produced by other manufacturers have not been studied. Insulin mixtures should not be administered intravenously. **Continuous Subcutaneous Insulin Infusion by External Pump: When used in an external subcutaneous insulin infusion pump, NovoLog® should not be mixed with any other insulin or diluent.** When using NovoLog® in an external insulin pump, the NovoLog®-specific information should be followed (e.g., in-use time, frequency of changing infusion sets) because NovoLog®-specific information may differ from general pump manual instructions. Pump or infusion set malfunctions or insulin degradation can lead to a rapid onset of hyperglycemia and ketosis because of the small subcutaneous depot of insulin. This is especially pertinent for rapid-acting insulin analogs that are more rapidly

absorbed through skin and have a shorter duration of action. Prompt identification and correction of the cause of hyperglycemia or ketosis is necessary. Interim therapy with subcutaneous injection may be required [see Warnings and Precautions]. NovoLog® should not be exposed to temperatures greater than 37°C (98.6°F). **NovoLog® that will be used in a pump should not be mixed with other insulin or with a diluent** [see Warnings and Precautions].

**ADVERSE REACTIONS: Clinical Trial Experience:** Because clinical trials are conducted under widely varying designs, the adverse reaction rates reported in one clinical trial may not be easily compared to those rates reported in another clinical trial, and may not reflect the rates actually observed in clinical practice. **Hypoglycemia:** Hypoglycemia is the most commonly observed adverse reaction in patients using insulin, including NovoLog® [see Warnings and Precautions]. **Insulin initiation and glucose control intensification:** Intensification or rapid improvement in glucose control has been associated with a transitory, reversible ophthalmologic refraction disorder, worsening of diabetic retinopathy, and acute painful peripheral neuropathy. However, long-term glycemic control decreases the risk of diabetic retinopathy and neuropathy. **Lipodystrophy:** Long-term use of insulin, including NovoLog®, can cause lipodystrophy at the site of repeated insulin injections or infusion. Lipodystrophy includes lipohypertrophy (thickening of adipose tissue) and lipoatrophy (thinning of adipose tissue), and may affect insulin absorption. Rotate insulin injection or infusion sites within the same region to reduce the risk of lipodystrophy. **Weight gain:** Weight gain can occur with some insulin therapies, including NovoLog®, and has been attributed to the anabolic effects of insulin and the decrease in glucosuria. **Peripheral Edema:** Insulin may cause sodium retention and edema, particularly if previously poor metabolic control is improved by intensified insulin therapy. **Frequencies of adverse drug reactions:** The frequencies of adverse drug reactions during NovoLog® clinical trials in patients with type 1 diabetes mellitus and type 2 diabetes mellitus are listed in the tables below.

**Table 1: Treatment-Emergent Adverse Events in Patients with Type 1 Diabetes Mellitus (Adverse events with frequency ≥ 5% and occurring more frequently with NovoLog® compared to human regular insulin are listed)**

Preferred Term	NovoLog® + NPH N= 596		Human Regular Insulin + NPH N= 286	
	N	(%)	N	(%)
Hypoglycemia*	448	75%	205	72%
Headache	70	12%	28	10%
Injury accidental	65	11%	29	10%
Nausea	43	7%	13	5%
Diarrhea	28	5%	9	3%

\*Hypoglycemia is defined as an episode of blood glucose concentration <45 mg/dL with or without symptoms.

**Table 2: Treatment-Emergent Adverse Events in Patients with Type 2 Diabetes Mellitus (except for hypoglycemia, adverse events with frequency ≥ 5% and occurring more frequently with NovoLog® compared to human regular insulin are listed)**

	NovoLog® + NPH N= 91		Human Regular Insulin + NPH N= 91	
	N	(%)	N	(%)
Hypoglycemia*	25	27%	33	36%
Hyporeflexia	10	11%	6	7%
Onychomycosis	9	10%	5	5%
Sensory disturbance	8	9%	6	7%
Urinary tract infection	7	8%	6	7%
Chest pain	5	5%	3	3%
Headache	5	5%	3	3%
Skin disorder	5	5%	2	2%
Abdominal pain	5	5%	1	1%
Sinusitis	5	5%	1	1%

\*Hypoglycemia is defined as an episode of blood glucose concentration <45 mg/dL, with or without symptoms.

**Postmarketing Data:** The following additional adverse reactions have been identified during postapproval use of NovoLog®. Because these adverse reactions are reported voluntarily from a population of uncertain size, it is generally not possible to reliably estimate their frequency. Medication errors in which other insulins have been accidentally substituted for NovoLog® have been identified during postapproval use.

**OVERDOSAGE:** Excess insulin administration may cause hypoglycemia and, particularly when given intravenously, hypokalemia. Mild episodes of hypoglycemia usually can be treated with oral glucose. Adjustments in drug dosage, meal patterns, or exercise, may be needed. More severe episodes with coma, seizure, or neurologic impairment may be treated with intramuscular/subcutaneous glucagon or concentrated intravenous glucose. Sustained carbohydrate intake and observation may be necessary because hypoglycemia may recur after apparent clinical recovery. Hypokalemia must be corrected appropriately.

**More detailed information is available on request.**

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For information about NovoLog® contact: Novo Nordisk Inc., Princeton, New Jersey 08540 1-800-727-6500 www.novonordisk-us.com

FlexPen® and NovoLog® are registered trademarks of Novo Nordisk A/S.

NovoLog® is covered by US Patent Nos. 5,618,913, 5,866,538, and other patents pending.

FlexPen® is covered by US Patent Nos. 6,582,404, 6,004,297, 6,235,004, and other patents pending.

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**NovoLog®**  
insulin aspart (rDNA origin) injection