Published Data on Acthar Gel in IgAN—Clinical Experience From Mayo Clinic, Columbia University, and Stanford University

An open-label pilot study of adrenocorticotrophic hormone in the treatment of IgA nephropathy at high risk of progression*


**SELECT IMPORTANT SAFETY INFORMATION**

**Indication**

Acthar® Gel (repository corticotropin injection) is indicated to induce a diuresis or a remission of proteinuria in nephrotic syndrome without uremia of the idiopathic type or that due to lupus erythematosus.

**Contraindications**

- Acthar should never be administered intravenously
- Administration of live or live attenuated vaccines is contraindicated in patients receiving immunosuppressive doses of Acthar
- Acthar is contraindicated where congenital infections are suspected in infants
- Acthar is contraindicated in patients with scleroderma, osteoporosis, systemic fungal infections, ocular herpes simplex, recent surgery, history of or the presence of a peptic ulcer, congestive heart failure, uncontrolled hypertension, primary adrenocortical insufficiency, adrenocortical hyperfunction, or sensitivity to proteins of porcine origin

This research was supported by a grant from Mallinckrodt Pharmaceuticals.

Please see additional Important Safety Information throughout and on page 4. Please see accompanying full Prescribing Information.
† MEST-C score was assessed in all patient biopsies.

* Patients with proteinuria >1 g/24 h.

eGFR = estimated glomerular filtration rate; MEST-C = mesangial hypercellularity, endocapillary hypercellularity, segmental glomerulosclerosis, and tubular atrophy/interstitial fibrosis–crescent.

• Acthar can cause elevation of blood pressure, salt and water retention, and hypokalemia. Blood pressure, sodium, and potassium levels may need to be monitored.

• Cushing’s syndrome may occur during therapy but generally resolves after therapy is stopped. Monitor patients for signs and symptoms.

• Suppression of the hypothalamic-pituitary-adrenal (HPA) axis may occur following prolonged therapy with the potential for adrenal insufficiency after withdrawal of the medication. Adrenal insufficiency may be minimized by tapering of the dose when discontinuing treatment. During recovery of the adrenal gland patients should be protected from the stress of illness or trauma by the use of corticosteroids. Monitor patients for effects of HPA suppression after stopping treatment.

• Acthar may increase susceptibility to infection or reactivation of latent infections.

Study limitations

• This pilot study included a small number of patients without a placebo group. Results may not be solely attributable to Acthar Gel.

• The follow-up duration was too short, and the long-term outcome was unknown. This limited the ability to measure the change in eGFR, which can occur over a longer period of time.

SELECT IMPORTANT SAFETY INFORMATION

Warnings and Precautions

• The adverse effects of Acthar are related primarily to its steroidogenic effects.

• Suppression of the hypothalamic-pituitary-adrenal (HPA) axis may occur following prolonged therapy with the potential for adrenal insufficiency after withdrawal of the medication. Adrenal insufficiency may be minimized by tapering of the dose when discontinuing treatment. During recovery of the adrenal gland patients should be protected from the stress (e.g., trauma or surgery) by the use of corticosteroids. Monitor patients for effects of HPA suppression after stopping treatment.

• Cushing’s syndrome may occur during therapy but generally resolves after therapy is stopped. Monitor patients for signs and symptoms.

• Acthar can cause elevation of blood pressure, salt and water retention, and hypokalemia. Blood pressure, sodium, and potassium levels may need to be monitored.

Study dosing and protocol

Patients in this study were given 80 units of Acthar Gel subcutaneously twice weekly for a total of 6 months.†

• After initiation of Acthar Gel treatment, patients were seen at 1, 3, 6, 9, and 12 months for comprehensive evaluation.

• During each visit, a comprehensive physical examination, evaluation for adverse events, routine CBC, serum chemistry, HbA1c, urine analysis with microscopy, and timed urine studies for evaluation of proteinuria and creatinine clearance were completed.

• The dosage and frequency of Acthar Gel should be individualized according to the medical condition, severity of the disease, and initial response of the patient.

– The usual dose of Acthar Gel is 40 to 80 units given intramuscularly or subcutaneously every 24 to 72 hours.

Baseline patient characteristics

Pre-Acthar Gel treatment patient data (N=19)§

| Median baseline 24-h proteinuria (mg) | 2635 (range: 1230 to 5243) |
| % patients with proteinuria >2 g/24 h | 74% (n=14) |
| % patients with proteinuria >3 g/24 h | 37% (n=7) |

| Mean baseline creatinine (mg/dL) | 1.40 ± 0.49 |
| Mean baseline eGFR\textsubscript{ckd-epi} (mL/min) | 66.5 ± 28.8 |
| Serum albumin (g/dL) | 3.79 ± 0.54 |
| Hematuria (RBC/HPF) | 22.9 ± 36.5 |

\textsuperscript{a} eGFR = estimated glomerular filtration rate; MEST-C = mesangial hypercellularity, endocapillary hypercellularity, segmental glomerulosclerosis, and tubular atrophy/interstitial fibrosis–crescent.

\textsuperscript{b} Patients with proteinuria >1 g/24 h.

\textsuperscript{c} MEST-C score was assessed in all patient biopsies.

\textsuperscript{d} Treatment with corticosteroids was stopped 3 months before enrollment in the study.

\textsuperscript{e} Treatment with cyclophosphamide, mycophenolate mofetil, and corticosteroids was stopped 6 months before patient enrollment in the study.

\textsuperscript{f} Treatment with cyclophosphamide, mycophenolate mofetil, and corticosteroids was stopped 6 months before patient enrollment in the study.

Please see accompanying Important Safety Information throughout and on page 4. Please see accompanying full Prescribing Information.
Proteinuria was significantly reduced in IgAN patients following Acthar Gel treatment

- In patients who achieved partial remission (n=8), median 24-h proteinuria at 6 and 12 months following Acthar Gel treatment was 732 mg (range: 444 to 2094 mg) and 625 mg (range: 344 to 1458 mg), respectively.

Median change from baseline in proteinuria at 6 and 12 months following Acthar Gel treatment

<table>
<thead>
<tr>
<th>Median 24-h proteinuria (mg)</th>
<th>Pre-Acthar Gel (N=19)</th>
<th>Post-Acthar Gel: 12 months (N=19)</th>
<th>P value</th>
</tr>
</thead>
<tbody>
<tr>
<td>2635 (range: 1230-5243 mg)</td>
<td>1274 (range: 344-6228 mg)</td>
<td>0.007</td>
<td></td>
</tr>
</tbody>
</table>

- 57.7% reduction in median proteinuria
- 51.7% reduction in median proteinuria

Selena Important Safety Information

- Acthar often acts by masking symptoms of other diseases/disorders. Monitor patients carefully during and for a period following discontinuation of therapy.
- Acthar can cause GI bleeding and gastric ulcer. There is also an increased risk for perforation in patients with certain gastrointestinal disorders. Monitor for signs of bleeding.
- Acthar may be associated with central nervous system effects ranging from euphoria, insomnia, irritability, mood swings, personality changes, and severe depression to psychosis. Existing conditions may be aggravated.
- Patients with comorbid disease may have that disease worsened. Caution should be used when prescribing Acthar in patients with diabetes and myasthenia gravis.
- Prolonged use of Acthar may produce cataracts, glaucoma, and secondary ocular infections. Monitor for signs and symptoms.
- Acthar is immunogenic and prolonged administration of Acthar may increase the risk of hypersensitivity reactions. Neutralizing antibodies with chronic administration may lead to loss of endogenous ACTH activity.
- There is an enhanced effect in patients with hypothyroidism and in those with cirrhosis of the liver.
- Long-term use may have negative effects on growth and physical development in children. Monitor pediatric patients.
- Decrease in bone density may occur. Bone density should be monitored for patients on long-term therapy.
- Pregnancy Class C: Acthar has been shown to be teratogenic in rabbits and should be used during pregnancy only if the potential benefit justifies the potential risk to the fetus.

IgAN patients receiving Acthar Gel achieved partial remission

42% (8/19) of patients achieved partial remission after 12 months.

- 7 of 8 patients who achieved partial remission had 24-h proteinuria <1 g at 12 months.
- No patients achieved complete remission.

Safety findings in IgAN patients

- None of the patients discontinued Acthar Gel treatment due to side effects.
- No incidences of hyperglycemia were reported.
- Drug-related adverse events included 6 infections and 7 injection-related reactions. The most common drug-related adverse events included muscle soreness, acne, hot flashes, anxiety, and insomnia.

SELECT IMPORTANT SAFETY INFORMATION

Adverse Reactions

- Common adverse reactions for Acthar are similar to those of corticosteroids and include fluid retention, alteration in glucose tolerance, elevation in blood pressure, behavioral and mood changes, increased appetite, and weight gain.
- Specific adverse reactions reported in IS clinical trials in infants and children under 2 years of age included: infection, hypotension, irritability, Cushingoid symptoms, constipation, diarrhea, vomiting, pyrexia, weight gain, increased appetite, decreased appetite, nasal congestion, acne, rash, and cardiac hypertrophy. Conversions were also reported, but these may actually be occurring because some IS patients progress to other forms of seizures and IS sometimes masks other seizures, which become visible once the clinical spasms from IS resolve.

Other adverse events reported are included in the full Prescribing Information.
IMPORTANT SAFETY INFORMATION

Contraindications
- Acthar should never be administered intravenously
- Administration of live or live attenuated vaccines is contraindicated in patients receiving immunosuppressive doses of Acthar
- Acthar is contraindicated where congenital infections are suspected in infants
- Acthar is contraindicated in patients with scleroderma, osteoporosis, systemic fungal infections, ocular herpes simplex, recent surgery, history of or the presence of a peptic ulcer, congestive heart failure, uncontrolled hypertension, primary adrenocortical insufficiency, adrenocortical hyperfunction, or sensitivity to proteins of porcine origin

Warnings and Precautions
- The adverse effects of Acthar are related primarily to its steroidogenic effects
- Acthar may increase susceptibility to new infection or reactivation of latent infections
- Suppression of the hypothalamic-pituitary-adrenal (HPA) axis may occur following prolonged therapy with the potential for adrenal insufficiency after withdrawal of the medication. Adrenal insufficiency may be minimized by tapering of the dose when discontinuing treatment. During recovery of the adrenal gland patients should be protected from the stress (e.g. trauma or surgery) by the use of corticosteroids. Monitor patients for effects of HPA suppression after stopping treatment
- Cushing's syndrome may occur during therapy but generally resolves after therapy is stopped. Monitor patients for signs and symptoms
- Acthar can cause elevation of blood pressure, salt and water retention, and hypokalemia. Blood pressure, sodium, and potassium levels may need to be monitored
- Acthar often acts by masking symptoms of other diseases/disorders. Monitor patients carefully during and for a period following discontinuation of therapy
- Acthar can cause GI bleeding and gastric ulcer. There is also an increased risk for perforation in patients with certain gastrointestinal disorders. Monitor for signs of bleeding
- Acthar may be associated with central nervous system effects ranging from euphoria, insomnia, irritability, mood swings, personality changes, and severe depression to psychosis. Existing conditions may be aggravated
- Patients with comorbid disease may have that disease worsened. Caution should be used when prescribing Acthar in patients with diabetes and myasthenia gravis
- Prolonged use of Acthar may produce cataracts, glaucoma, and secondary ocular infections. Monitor for signs and symptoms
- Acthar is immunogenic and prolonged administration of Acthar may increase the risk of hypersensitivity reactions. Neutralizing antibodies with chronic administration may lead to loss of endogenous ACTH activity
- There is an enhanced effect in patients with hypothyroidism and in those with cirrhosis of the liver
- Long-term use may have negative effects on growth and physical development in children. Monitor pediatric patients
- Decrease in bone density may occur. Bone density should be monitored for patients on long-term therapy
- Pregnancy Class C: Acthar has been shown to have an embryocidal effect and should be used during pregnancy only if the potential benefit justifies the potential risk to the fetus

Adverse Reactions
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Other adverse events reported are included in the accompanying full Prescribing Information.

Please see accompanying full Prescribing Information.

Acthar® Gel

HIGHLIGHTS OF PRESCRIBING INFORMATION
These highlights do not include all the information needed to use Acthar® Gel safely and effectively. See full prescribing information for Acthar Gel.

Acthar Gel (repository corticotropin injection) INJECTION, GEL for INTRAMUSCULAR use
Initial U.S. Approval: 1952

INDICATIONS AND USAGE
• Acthar Gel is indicated as monotherapy for the treatment of infantile spasms in infants and children under 2 years of age. (1.1)
• Acthar Gel is indicated for the treatment of exacerbations of multiple sclerosis in adults. (1.2)

Dosage and Administration
• In the treatment of infantile spasms, the recommended dose is 150 U/m² divided into twice daily intramuscular injections of 75 U/m². After 2 weeks of treatment, dosing should be gradually tapered and discontinued over a 2-week period. (2.1)
• In the treatment of acute exacerbations of multiple sclerosis, daily intramuscular or subcutaneous doses of 80-120 units for 2-3 weeks may be administered. It may be necessary to taper the dose. (2.2)
• In the treatment of other disorders and diseases, dosing will need to be individualized depending on the disease under treatment and the medical condition of the patient. It may be necessary to taper the dose. (2.3)

Dosage Forms and Strengths
• 5 mL multi-dose vial containing 80 USP units per mL. (3)

Contraindications
• Acthar Gel should never be given intravenously.
• Acthar Gel is contraindicated in patients with scleroderma, osteoporosis, systemic fungal infections, ocular herpes simplex, recent surgery, history of or the presence of a peptic ulcer, congestive heart failure, uncontrolled hypertension, or sensitivity to proteins of porcine origin.

Warnings and Precautions
• Infections: Increased susceptibility to new infection and increased risk of exacerbation.
• Treatment of conditions listed within the INDICATIONS AND USAGE section is contraindicated when they are accompanied by primary adrenocortical insufficiency or infections. (4)

Adverse Reactions
• Common adverse reactions for Acthar Gel are similar to those of corticosteroids and include fluid retention, alteration in glucose tolerance, elevation in blood pressure, behavioral and mood changes, increased appetite and weight gain. (6)
• Specific adverse reactions resulting from drug use in children under 2 years of age are increased risk of infections, hypertension, irritability, Cushingoid symptoms, cardiac hypertrophy and weight gain. (6.1.1)

Adverse Reactions in Infants and Children
• Use in Pregnancy: Embryocidal effect. Apprise women of potential harm to the fetus. (5.14)
• Decrease in Bone Density: Monitor for osteoporosis in patients on long term therapy. (5.13)
• Use in Pregnancy: Embryocidal effect. Apprise women of potential harm to the fetus. (5.14)

Use in Specific Populations
• Pregnancy: Acthar Gel has been shown to have an embryocidal effect and should be used during pregnancy only if the potential benefit justifies the potential risk to the fetus. (8.1)
• Pediatric Use: Prolonged use of Acthar Gel in children may inhibit skeletal growth. If use is necessary, it should be given intermittently with careful observation. (5.12 and 8.4)

See 17 for Patient Counseling Information and FDA-approved Medication Guide

Revised: 3/2019

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FULL PRESCRIBING INFORMATION

1 INDICATIONS AND USAGE

1.1 Infantile spasms
Acthar Gel (repository corticotropin injection) is indicated as monotherapy for the treatment of infantile spasms in infants and children under 2 years of age.

1.2 Multiple Sclerosis
Acthar Gel (repository corticotropin injection) is indicated for the treatment of acute exacerbations of multiple sclerosis in adults. Controlled clinical trials have shown Acthar Gel to be effective in speeding the resolution of acute exacerbations of multiple sclerosis. However, there is no evidence that this reflects the ultimate outcome or natural history of the disease.

1.3 Rheumatic Disorders
As adjunctive therapy for short-term administration (to tide the patient over an acute episode or exacerbation) in: Psoriatic arthritis; Rheumatoid arthritis, including juvenile rheumatoid arthritis (selected cases may require low-dose maintenance therapy), Ankylosing spondylitis.

1.4 Collagen Diseases
During an exacerbation or as maintenance therapy in selected cases of: systemic lupus erythematosus, systemic dermatomyositis (polymyositis).

1.5 Dermatologic Diseases
Severe erythema multiforme, Stevens-Johnson syndrome.

1.6 Allergic States
Serum sickness.

1.7 Ophthalmic Diseases
Severe acute and chronic allergic and inflammatory processes involving the eye and its adnexa such as: keratitis; iritis, iridocyclitis, diffuse posterior uveitis and choroiditis, optic neuritis, chorioretinitis; anterior segment inflammation.

1.8 Respiratory Diseases
Symptomatic sarcoidosis.

1.9 Edematous State
To induce a diuresis or a remission of proteinuria in the nephrotic syndrome without uremia of the idiopathic type or that due to lupus erythematosus.

2 DOSAGE AND ADMINISTRATION

2.1 Specific Recommended Dosage Regimen for Infantile Spasms in Infants and Children Under 2 Years of Age
In the treatment of infantile spasms, Acthar Gel must be administered intramuscularly. The recommended regimen is a daily dose of 150 U/m² (divided into twice daily intramuscular injections of 75 U/m²) administered over a 2-week period. Dosing with Acthar Gel should then be gradually tapered over a 2-week period to avoid adrenal insufficiency. The following is one suggested tapering schedule: 30 U/m² in the morning for 3 days; 15 U/m² in the morning for 3 days; 10 U/m² in the morning for 3 days; and 10 U/m² every other morning for 6 days.

Acthar Gel is typically dosed based on body surface area (BSA). For calculation of body surface area, use the following formula

\[ BSA (m^2) = \frac{weight (kg) \times height (cm)}{3600} \]

2.2 Recommended Dosage Regimen for the Treatment of Acute Exacerbations in Adults with Multiple Sclerosis
The recommended dose is daily intramuscular or subcutaneous doses of 80-120 units for 2-3 weeks for acute exacerbations.

Dosage should be individualized according to the medical condition of each patient. Frequency and dose of the drug should be determined by considering the severity of the disease and the initial response of the patient. Although drug dependence does not occur, sudden withdrawal of the drug may occur, and it may be necessary to taper the dose and increase the injection interval to gradually discontinue the medication.

2.3 Recommended Dosage Regimen for Other Indications for Adults and Children Over 2 Years of Age
Dosage should be individualized according to the disease under treatment and the general medical condition of each patient. Frequency and dose of the drug should be determined by considering severity of the disease and the initial response of the patient.

The usual dose of Acthar Gel is 40-80 units given intramuscularly or subcutaneously every 24-72 hours.

Although drug dependence does not occur, sudden withdrawal of the drug may occur, and it may be necessary to taper the dose and increase the injection interval to gradually discontinue the medication.

2.4 Preparation
Acthar Gel should be warmed to room temperature before using. Caution should be taken not to over-pressurize the vial prior to withdrawing the product.

3 DOSAGE FORMS AND STRENGTHS
5 mL multi-dose vial containing 80 USP Units per mL.

4 CONTRAINDICATIONS
Acthar Gel is contraindicated for intravenous administration.

Acthar Gel is contraindicated where congenital infections are suspected in infants. Administration of live or live attenuated vaccines is contraindicated in patients receiving immunosuppressive doses of Acthar Gel.

Acthar Gel is contraindicated in patients with scoliosis, osteoporosis, systemic fungal infections, ocular herpes simplex, recent surgery, history of or the presence of a peptic ulcer, congestive heart failure, uncontrolled hypertension, primary adenocortical insufficiency, adrenocortical hyperfunction or sensitivity to proteins of porcine origin.

5 WARNINGS AND PRECAUTIONS
The adverse effects of Acthar Gel are related primarily to its steroidogenic effects. Not all of the adverse events described below have been seen after treatment with Acthar Gel, but might be expected to occur [see Adverse Reactions (6.3)].

5.1 Infections
Adrenal insufficiency may increase the risks related to infections with any pathogen, including viral, bacterial, fungal, protozoan or helminthic infections. Patients with latent tuberculosis or tuberculin reactivity should be observed closely, and if therapy is prolonged, chemoprophylaxis should be instituted.

5.2 Cushing's Syndrome and Adrenal Insufficiency Upon Withdrawal
Treatment with Acthar Gel can cause hypothalamic-pituitary-axis (HPA) suppression and Cushing’s syndrome. These conditions should be monitored especially with chronic use. Suppression of the HPA may occur following prolonged therapy with the potential for adrenal insufficiency after withdrawal of the medication. Patients should be monitored for signs of insufficiency such as weakness, hyperpigmentation, weight loss, hypotension and abdominal pain.

The symptoms of adrenal insufficiency in infants treated for infantile spasms can be difficult to identify. The symptoms are non-specific and may include anorexia, fatigue, lethargy, weakness, excessive weight loss, hypotension and abdominal pain. It is critical that parents and caregivers be made aware of the possibility of adrenal insufficiency when discontinuing Acthar Gel and should be instructed to observe for, and be able to recognize, these symptoms [see Patient Counseling Information (17)].

The recovery of the adrenal gland may take from days to months so patients should be protected from the stress (e.g. trauma or surgery) by the use of corticosteroids during the period of stress.

The adrenal insufficiency may be minimized in adults and infants by tapering the dose when discontinuing treatment.

Signs or symptoms of Cushing’s syndrome may occur during therapy but generally resolve after therapy is stopped. Patients should be monitored for these signs and symptoms such as deposition of adipose tissue in characteristics sites (e.g., moon face, truncal obesity), cutaneous striae, easy bruising, decreased bone mineralization, weight gain, muscle weakness, hyperglycemia, and hypertension.

5.3 Elevated Blood Pressure, Salt and Water Retention and Hypokalemia
Acthar Gel can cause elevation of blood pressure, salt and water retention, and increased excretion of potassium and calcium. Dietary salt restriction and potassium supplementation may be necessary. Caution should be used in the treatment of patients with hypertension, congestive heart failure, or renal insufficiency.

5.4 Vaccination
Administration of live or live attenuated vaccines is contraindicated in patients receiving immunosuppressive doses of Acthar Gel. Killed or inactivated vaccines may be administered; however, the response to such vaccines can not be predicted. Other immunization procedures should be undertaken with caution in patients who are receiving Acthar Gel, especially when high doses are administered, because of the possible hazards of neurological complications and lack of antibody response.

5.5 Masking Symptoms of Other Diseases
Acthar Gel often acts by masking symptoms of other diseases/disorders without altering the course of the other disease/disorder. Patients should be monitored carefully during and for a period following discontinuation of therapy for signs of infection, abnormal cardiac function, hypertension, hyperglycemia, change in body weight and fecal blood loss.

5.6 Gastrointestinal Perforation and Bleeding
Acthar Gel can cause GI bleeding and gastric ulcer. There is also an increased risk for perforation in patients with certain gastrointestinal disorders. Signs of gastrointestinal perforation, such as peritoneal irritation, may be masked by the therapy. Use caution where there is the possibility of impending perforation, abrasion or other pyogenic infections, diverticulitis, fresh intestinal anastomoses, and active or latent peptic ulcer.

5.7 Behavioral and Mood Disturbances
Use of Acthar Gel may be associated with central nervous system effects ranging from euphoria, insomnia, irritability (especially in infants), mood swings, personality changes, and severe depression, to frank psychotic manifestations. Also, existing emotional instability or psychotic tendencies may be aggravated.

5.8 Comorbid Diseases
Patients with a comorbid disease may have that disease worsened. Caution should be used when prescribing Acthar Gel in patients with diabetes and myasthenia gravis.

5.9 Ophthalmic Effects
Prolonged use of Acthar Gel may produce posterior subcapsular cataracts, glaucoma with possible damage to the optic nerves and may enhance the establishment of secondary ocular infections due to fungi and viruses.

5.10 Immunogenicity Potential
Acthar Gel is immunogenic. Limited available data suggest that a patient may develop antibodies to Acthar Gel after chronic administration and loss of endogenous ACTH and Acthar Gel activity. Prolonged administration of Acthar Gel may increase the risk of hypersensitivity reactions. Sensitivity to porcine protein should be considered before starting therapy and during the course of treatment should symptoms arise.

5.11 Use in Patients with Hypothyroidism or Liver Cirrhosis
There is an enhanced effect in patients with hypothyroidism and in those with cirrhosis of the liver.
5.12 Negative Effects on Growth and Physical Development
Long-term use of Acthar Gel may have negative effects on growth and physical development in children. Changes in appetite are seen with Acthar Gel therapy, with the effects becoming more frequent as the dose or treatment period increases. These effects are reversible once Acthar Gel therapy is stopped. Growth and physical development of pediatric patients on prolonged therapy should be carefully monitored.

5.13 Decrease in Bone Density
Decrease in bone formation and an increase in bone resorption both through an effect on calcium regulation (i.e., decreasing absorption and increasing excretion) and inhibition of osteoblast function may occur. These, together with a decrease in the protein matrix of the bone (secondary to an increase in protein catabolism) and reduced sex hormone production, may lead to inhibition of bone growth in children and adolescents and to the development of osteoporosis at any age. Special consideration should be given to patients at increased risk of osteoporosis (i.e., postmenopausal women) before initiating therapy, and bone density should be monitored in patients on long term therapy.

5.14 Use in Pregnancy
Acthar Gel has been shown to have an embryocidal effect. Apprise women of potential harm to the fetus [see Use in Specific Populations (8.1)].

6 ADVERSE REACTIONS
Please refer to Adverse Reactions in Infants and Children Under 2 Years of Age (Section 6.1.1) for consideration when treating patients with Infantile Spasms. The adverse reactions presented in Section 6.2 are primarily provided for consideration in use in adults and in children over 2 years of age, but these adverse reactions should also be considered when treating infants and children under 2 years of age.

Acthar Gel causes the release of endogenous cortisol from the adrenal gland. Therefore all the adverse effects known to occur with elevated cortisol may occur with Acthar Gel administration as well. Common adverse reactions include fluid retention, alteration in glucose tolerance, elevation in blood pressure, behavioral and mood changes, increased appetite and weight gain.

6.1 Clinical Studies 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 trials of another drug, and may not reflect the rates observed in practice.

6.1.1 Adverse Reactions in Infants and Children Under 2 Years of Age
While the types of adverse reactions seen in infants and children under age 2 treated for infantile spasms are similar to those seen in older patients, their frequency and severity may be different due to the very young age of the infant, the underlying condition, the duration of therapy and the dosage regimen. Below is a summary of adverse reactions specifically tabulated from source data derived from retrospective chart reviews and clinical trials in children under 2 years of age treated for infantile spasms. The number of patients in controlled trials at the recommended dose was too few to provide meaningful incidence rates or to permit a meaningful comparison to the control groups.

**TABLE: Incidence (%) of Treatment Emergent Adverse Events Occurring in ≥ 2% of Acthar Gel (repository corticotropin injection) Infants and Children under 2 years of Age**

<table>
<thead>
<tr>
<th>System Organ Class</th>
<th>Recommended 75 U/m² bid n=122, (%)</th>
<th>150 U/m² qd n=37 (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Cardiac disorders</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cardiac Hypertrophy</td>
<td>3</td>
<td>0</td>
</tr>
<tr>
<td><strong>Endocrine disorders</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cushingoid</td>
<td>3</td>
<td>22</td>
</tr>
<tr>
<td><strong>Gastrointestinal disorders</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Constipation</td>
<td>0</td>
<td>5</td>
</tr>
<tr>
<td>Diarrhea</td>
<td>3</td>
<td>14</td>
</tr>
<tr>
<td>Vomiting</td>
<td>3</td>
<td>5</td>
</tr>
<tr>
<td><strong>General disorders and administration site conditions</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Irritability</td>
<td>7</td>
<td>19</td>
</tr>
<tr>
<td>Pyrexia</td>
<td>5</td>
<td>8</td>
</tr>
<tr>
<td><strong>Infections and infestations</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Infection*</td>
<td>20</td>
<td>46</td>
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<tr>
<td><strong>Investigations</strong></td>
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<tr>
<td>Weight gain</td>
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<td>3</td>
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<tr>
<td><strong>Metabolism and nutrition disorders</strong></td>
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<td></td>
</tr>
<tr>
<td>Increased appetite</td>
<td>0</td>
<td>5</td>
</tr>
<tr>
<td>Decreased appetite</td>
<td>3</td>
<td>3</td>
</tr>
<tr>
<td><strong>Nervous system disorders</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Convulsion†</td>
<td>12</td>
<td>3</td>
</tr>
<tr>
<td><strong>Respiratory, thoracic and mediastinal disorders</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Nasal Congestion</td>
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<td>5</td>
</tr>
<tr>
<td><strong>Skin and subcutaneous tissue disorders</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Acne</td>
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<td>14</td>
</tr>
<tr>
<td>Rash</td>
<td>0</td>
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</table>

* Specific infections that occurred at ≥ 2% were candidiasis, otitis media, pneumonia and upper respiratory tract infections. † In the treatment of Infantile Spasms, other types of seizures/convulsions may occur because some patients with infantile spasms progress to other forms of seizures (for example, Lennox-Gastaut Syndrome). Additionally, the spasms sometimes mask other seizures and once the spasms resolve after treatment, the other seizures may become visible.

These adverse reactions may also be seen in adults and children over 2 years of age when treated for other purposes and with different doses and regimens.

6.2 Postmarketing Experience
The following adverse reactions associated with the use of Acthar Gel have been identified from postmarketing experience with Acthar Gel. Only adverse events that are not listed above as adverse events reported from retrospective chart reviews and non-sponsor conducted clinical trials and those not discussed elsewhere in labeling, are listed in this section. Because the adverse reactions are reported voluntarily from a population of uncertain size, it is not always possible to estimate their frequency or establish a causal relationship to use with Acthar Gel. Events are categorized by system organ class. Unless otherwise noted these adverse events have been reported in infants, children and adults.

6.2.1 Allergic Reactions
Allergic responses have presented as dizziness, nausea and shock (adults only).

6.2.2 Cardiovascular
Necrotizing angitis (adults only) and congestive heart failure.

6.2.3 Dermatologic
Skin thinning (adults only), facial erythema and increased sweating (adults only).

6.2.4 Endocrine
Decreased carbohydrate tolerance (infants only) and hirsutism.

6.2.5 Gastrointestinal
Pancreatitis (adults only), abdominal distention and ulcerative esophagitis.

6.2.6 General Disorders and Administration Site Conditions
Injection site reactions.

6.2.7 Metabolic
Hypokalemia (adults only).

6.2.8 Musculoskeletal
Muscle weakness and vertebral compression fractures (infants only).

6.2.9 Neurological
Headache (adults only), vertigo (adults only), subdural hematoma, intracranial hemorrhage (adults only), and reversible brain shrinkage (usually secondary to hypertension) (infants only).

6.3 Possible Additional Steroidogenic Effects
Based on steroidogenic effects of Acthar Gel certain adverse events may be expected due to the pharmacological effects of corticosteroids. The adverse events that may occur but have not been reported for Acthar Gel are:

6.3.1 Dermatologic
Impaired wound healing, abscess, petechiae and ecchymoses, and suppression of skin test reactions.

6.3.2 Endocrine
Menstrual irregularities.

6.3.3 Metabolic
Negative nitrogen balance due to protein catabolism.

6.3.4 Musculoskeletal
Loss of muscle mass and aseptic necrosis of femoral and humeral heads.

6.3.5 Neurological
Increased intracranial pressure with papilledema, (pseudo-tumor cerebri) usually after treatment, and subdural effusion.

6.3.6 Ophthalmic
Exophthalmos.

7 DRUG INTERACTIONS
Formal drug-drug interaction studies have not been performed. Acthar Gel may accentuate the electrolyte loss associated with diuretic therapy.

8 USE IN SPECIFIC POPULATIONS
8.1 Pregnancy
Pregnancy Class C: Acthar Gel has been shown to have an embryocidal effect. There are no adequate and well-controlled studies in pregnant women. Acthar Gel should be used during pregnancy only if the potential benefit justifies the potential risk to the fetus.

8.3 Nursing Mothers
It is not known whether this drug is excreted in human milk. Because many drugs are excreted in human milk and because of the potential for serious adverse reactions in nursing infants from Acthar Gel, when treating a nursing mother, a decision should be made whether to discontinue nursing or to discontinue the drug, considering the risk and benefit to the mother.
8.4 Pediatric Use
Acthar Gel is indicated as monotherapy for the treatment of infantile spasms in infants and children less than 2 years of age. Both serious and other adverse reactions in this population are discussed in Warnings and Adverse Reactions in Infants and Children Under 2 Years of Age [see Sections 5 and 6.1.1].

The efficacy of Acthar Gel for the treatment of infantile spasms in infants and children less than 2 years of age was evaluated in a randomized, single blinded (video EEG interpreted blinded) clinical trial and an additional active control supportive trial [see Clinical Studies (14)]. A responding patient was defined as having both complete cessation of spasms and elimination of hynparrhythmia.

Safety in the pediatric population for infantile spasms was evaluated by retrospective chart reviews and data from non-sponsor conducted clinical trials [see Adverse Reactions (6.1.1)]. While the types of adverse reactions seen in infants and children under 2 years of age treated for infantile spasms are similar to those seen in older patients, their frequency and severity may be different due to the very young age of the infant, the underlying disorder, the duration of therapy and the dosage regimen. Effects on growth are of particular concern [see Warnings and Precautions (5.12)]. Serious adverse reactions observed in adults may also occur in children [see Warnings and Precautions (5)].

10 OVERDOSAGE
While chronic exposure to Acthar Gel at high doses can be associated with a variety of potential serious adverse effects, it is not expected that a single high dose, or even several large doses, will result in the serious adverse effects compared to a standard dose. There have been no reports of death or acute overdose symptoms from Acthar Gel in clinical studies or in the published literature.

The intramuscular route of administration makes it unlikely that an inadvertent acute overdose will occur. The typical daily dose of Acthar Gel to treat an infant that has a BSA of 0.4 m² would be 60 U/day. Using the 1 cc syringe supplied with Acthar Gel, the maximum amount that can be injected is 80 U, which is a well-tolerated single dose.

11 DESCRIPTION
Acthar Gel is a naturally sourced complex mixture of adrenocorticotropic hormone analogs and other pituitary peptides. The Acthar Gel manufacturing process converts the initial porcine pituitary extract with ACTH into a mixture having modified porcine ACTH and other related peptide analogs solubilized in gelatin. A major component in the formulated complex mixture is N-25 deamidated porcine ACTH (1-39).

Acthar Gel is supplied as a sterile preparation in 16 mL gelatin to provide a prolonged release after intramuscular or subcutaneous injection. Acthar Gel also contains 0.5% phenol, not more than 0.1% cysteine (added), sodium hydroxide and/or acetic acid to adjust pH and water for injection.

12 CLINICAL PHARMACOLOGY
12.1 Mechanism of Action
The mechanism of action of Acthar Gel in the treatment of infantile spasms is unknown. Acthar Gel and endogenous ACTH stimulate the adrenal cortex to secrete cortisol, corticosterone, aldosterone and a number of weak androgenic substances. Prolonged administration of large doses of Acthar Gel induces hyperplasia and hypersecretion of the adrenal cortex and continuous high output of cortisol, corticosterone and weak androgens. The release of endogenous ACTH is under the influence of the nervous system via the regulatory hormone released from the hypothalamus and a negative corticosteroid feedback mechanism. Elevated plasma corticosteroid suppresses ACTH release.

Acthar Gel is also reported to bind to melanocortin receptors.

The trophic effects of endogenous ACTH and Acthar Gel on the adrenal cortex are not well understood beyond the fact that they appear to be mediated by cyclic AMP. ACTH rapidly disappears from the circulation following its intravenous administration; in people, the plasma half-life is about 15 minutes. The pharmacokinetics of Acthar Gel have not been adequately characterized.

The maximal effects of a trophic hormone on a target organ are achieved when optimal amounts of hormone are acting continuously. Thus, a fixed dose of Acthar Gel will demonstrate a linear increase in adrenocortical secretion with increasing duration for the infusion.

13 NONCLINICAL TOXICOLOGY
13.1 Carcinogenesis, Mutagenesis, Impairment of Fertility
Adequate and well-controlled studies have not been done in animals. Human use has not been associated with an increase in malignant disease [see Warnings and Precautions (5.14) and Use in Specific Populations (8.1)].

14 CLINICAL STUDIES
The effectiveness of Acthar Gel as a treatment for infantile spasms was demonstrated in a single blinded (video EEG interpreter blinded) clinical trial in which patients were randomized to receive either a 2 week course of treatment with Acthar Gel (75 U/m² intramuscular twice daily) or prednisone (1 mg/kg by mouth twice daily). The primary outcome was a comparison of the number of patients in each group who were treatment responders, defined as a patient showing both complete cessation of spasms and elimination of hypoparrhythmia.

In the treatment of Infantile Spasms, other types of seizures may occur because some patients with infantile spasms progress to other forms of seizures (for example, Lennox-Gastaut Syndrome). Additionally, the spasms sometimes mask other seizures and one the spasms resolve after treatment with Acthar Gel, the other seizures may become visible. Parents and caregivers should inform their physician of any new onset of seizures so that appropriate management can then be instituted [see Adverse Reactions (6.1.1)].

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