AcelRx Pharmaceuticals, Inc.

June 2021

IMPORTANT CORRECTION OF DRUG INFORMATION

Subject:	**Correction of Information for DSUVIA® (sufentanil) sublingual tablet, 30 mcg in response to FDA Warning Letter**

Dear Healthcare Provider:

This letter is being sent to you at the request of the U.S. Food and Drug Administration's (FDA) Office of Prescription Drug Promotion. On February 11, 2021, the FDA issued a Warning Letter to AcelRx Pharmaceuticals, Inc. (AcelRx) regarding a web-based media banner and a tabletop display, on display at a medical conference for DSUVIA (sufentanil) sublingual tablet, CII, during 2019. The FDA issued a Warning Letter to AcelRx stating that the promotional communications are false or misleading because they:

- Contained false or misleading claims about the benefits of DSUVIA thereby minimizing the risk of respiratory depression that can result from accidental exposure
- Omitted material dosing information pertaining to the serious risks associated with DSUVIA
- Failed to adequately convey material information regarding the limitations of use for DSUVIA

To correct the misleading messages identified by the FDA and respond directly to the concerns described in the Warning Letter, AcelRx presents the following points for clarification.

1. <u>CORRECTION: False or Misleading Claims About the Benefits of DSUVIA thereby Minimizing the Risk of Respiratory Depression that can result from Accidental Exposure</u>

The promotional communications included the marketing tagline claim, "Tongue and Done," which implied that the administration of DSUVIA consists of a simple, one-step process. However, the administration of DSUVIA consists of numerous administration steps. It is very important that all healthcare providers administering DSUVIA be trained on the Directions for Use, which are attached to each DSUVIA package. All eight (8) steps must be followed, including a very important step to visually confirm the placement of the tablet in the patient's sublingual space to avoid the risk of misplaced tablets which can lead to respiratory depression and death as a result of accidental exposure.

AcelRx Pharmaceuticals, Inc.
25821 Industrial Boulevard, Suite 400
Hayward, CA 94545

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2. CORRECTION: Omission of material dosing information pertaining to the serious risks associated with DSUVIA

The banner ad included a dosing presentation that omitted material information about the maximum daily dosage. The approved Package Insert for DSUVIA specifies as needed dosing (PRN) of DSUVIA and a minimum one-hour inter-dosing interval. However, to avoid the serious risks associated with overdose with DSUVIA including respiratory depression and death, it is important to know that the maximum allowed daily dose of DSUVIA is 12 tablets.

3. CORRECTION: Failure to adequately convey material information regarding the FDA-approved indication

The banner ad failed to adequately convey the full indication of DSUVIA including the limitations of use. The full indication for DSUVIA is presented below:

> **Indications and Usage**
> DSUVIA is indicated for use in adults in a certified medically supervised healthcare setting, such as hospitals, surgical centers, and emergency departments, for the management of acute pain severe enough to require an opioid analgesic and for which alternative treatments are inadequate.
>
> Limitations of Use:
> - Not for home use or for use in children. Discontinue treatment with DSUVIA before patients leave the certified medically supervised healthcare setting.
> - Not for use for more than 72 hours. The use of DSUVIA beyond 72 hours has not been studied.
> - Only to be administered by a healthcare provider.
> - Because of the risks of addiction, abuse, and misuse with opioids, even at recommended doses, reserve DSUVIA for use in patients for whom alternative treatment options [e.g., non-opioid analgesics or opioid combination products]:
> - Have not been tolerated, or are not expected to be tolerated,
> - Have not provided adequate analgesia, or are not expected to provide adequate analgesia.

This letter is not intended as a complete description of the benefits and risks related to the use of DSUVIA. If you are receiving this Dear HCP letter via e-mail attachment, please refer to the full prescribing information, which is located via hyperlink at the www.DSUVIAREMS.com and www.DSUVIA.com websites. The Directions for Use are also available via hyperlink at the DSUVIA.com website.

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Reporting Adverse Events

Healthcare providers and patients are encouraged to report suspected adverse events in patients taking DSUVIA to AcelRx at 1-855-925-8476. You are encouraged to report negative side effects of prescription drugs to the FDA. Visit www.fda.gov/medwatch, or call 1-800-FDA-1088.

You may also contact AcelRx's DSUVIA medical information and call center at 1-855-925-8476 if you have any questions about the information contained in this letter, the DSUVIA REMS program, or the safe and effective use of DSUVIA.

Sincerely,

Pamela P. Palmer, MD, PhD
Chief Medical Officer

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