

Frequently Asked Questions on the Emergency Use Authorization for Molnupiravir for Treatment of COVID-19

Q: What is an emergency use authorization (EUA)?

A: Under section 564 of the Federal Food, Drug & Cosmetic Act, after a declaration by the HHS Secretary based on one of four types of determinations, FDA may authorize an unapproved product or unapproved uses of an approved product for emergency use. In issuing an EUA, FDA must determine, among other things, that based on the totality of scientific evidence available to the agency, including data from adequate and well-controlled clinical trials, if available, it is reasonable to believe that the product may be effective in diagnosing, treating, or preventing a serious or life-threatening disease or condition caused by a chemical, biological, radiological, or nuclear agent; that the known and potential benefits of the product, when used to treat, diagnose or prevent such disease or condition, outweigh the known and potential risks for the product; and that there are no adequate, approved, and available alternatives. Emergency use authorization is NOT the same as FDA approval or licensure.

Q: What does this EUA authorize? What are the limitations of authorized use?

A: FDA has issued an <u>EUA</u> for the emergency use of the unapproved product molnupiravir for the treatment of mild-to-moderate coronavirus disease 2019 (COVID-19) in adults who are at high risk for progression to severe COVID-19, including hospitalization or death, and for whom alternative COVID-19 treatment options approved or authorized by FDA are not accessible or clinically appropriate. Molnupiravir is not FDA-approved for any use including for the treatment of COVID-19. Prior to initiating treatment with molnupiravir, carefully consider the known and potential risks and benefits.

Molnupiravir is <u>not</u> authorized:

- for use in patients less than 18 years of age.
- for initiation of treatment in patients requiring hospitalization due to COVID-19. Benefit of treatment with molnupiravir has not been observed in subjects when treatment was initiated after hospitalization due to COVID-19.
- for use for longer than five consecutive days.
- for pre-exposure or post-exposure prophylaxis for prevention of COVID-19.

Q: How is high risk defined under the EUA?

A: Information about conditions that place a patient with mild-to-moderate COVID-19 at increased risk for disease progression or death can be found at the Centers for Disease Control and Prevention's People with Certain Medical Conditions website. Health care providers should consider the benefit-risk for an individual patient.

Q: What does direct SARS-CoV-2 viral testing mean?

A: Direct SARS-CoV-2 viral tests diagnose current COVID-19 infection. Direct SARS-CoV-2 viral tests include two types of diagnostic tests for COVID-19:

- Molecular tests, such as reverse transcription polymerase chain reaction (RT-PCR) tests, that detect the virus's genetic material.
- Antigen tests that detect specific proteins from the virus.



Antibody tests should not be used to diagnose COVID-19 and are not direct SARS-CoV-2 viral tests. Antibody tests look for antibodies that the immune system makes in response to the SARS-CoV-2 virus.

Q: Are there any warnings or precautions that should be taken when administering molnupiravir? A: Yes, health care providers and patients must be aware of the following warnings and precautions:

Pregnancy

Molnupiravir may cause fetal harm when administered to pregnant individuals. Therefore, molnupiravir is not recommended for use during pregnancy. Prior to initiating treatment with molnupiravir, health care providers should assess whether an individual of childbearing potential is pregnant or not, if clinically indicated. Molnupiravir is authorized to be prescribed to a pregnant individual only after the health care provider has determined that the benefits would outweigh the risks for that individual patient and the known and potential benefits and potential risks of using molnupiravir during pregnancy are communicated to the pregnant individual.

Lactation

Breastfeeding is not recommended during treatment with molnupiravir and for four days after the final dose. A lactating individual may consider interrupting breastfeeding and may consider pumping and discarding breast milk during treatment and for 4 days after the last dose of molnupiravir.

Females of Reproductive Potential

Females of childbearing potential are advised to use a reliable method of contraception correctly and consistently, as applicable, for the duration of treatment and for four days after the last dose of molnupiravir.

• Males of Reproductive Potential

While the risk is regarded as low, studies to fully assess the potential for molnupiravir to affect offspring of treated males have not been completed. Sexually active individuals with partners of childbearing potential are advised to use a reliable method of contraception correctly and consistently during treatment and for at least three months after the last dose of molnupiravir. The risk beyond three months after the last dose of molnupiravir is unknown. Studies to understand the risk beyond three months are ongoing.

Hypersensitivity Including Anaphylaxis

Hypersensitivity reactions, including anaphylaxis, have been reported with molnupiravir. If signs and symptoms of a clinically significant hypersensitivity reaction or anaphylaxis occur, immediately discontinue molnupiravir and initiate appropriate medications and/or supportive care.

Q: Are there potential side effects of molnupiravir?

A: Possible side effects of molnupiravir include diarrhea, nausea, and dizziness. Molnupiravir is not recommended for use during pregnancy because findings from animal reproduction studies showed that molnupiravir may cause fetal harm when administered to pregnant individuals.

Hypersensitivity, anaphylaxis, angioedema, erythema, rash, and urticaria adverse reactions have been identified during post-authorization use of molnupiravir.



Q: Why is molnupiravir only authorized in adults?

A: Molnupiravir is not authorized for use in patients less than 18 years of age because it may affect bone and cartilage growth.

Q: Is molnupiravir approved by the FDA to prevent or treat COVID-19?

A: No. Molnupiravir is not FDA-approved to prevent or treat any diseases or conditions, including COVID-19. Molnupiravir is an investigational drug.

Q: How can molnupiravir be obtained for use under the EUA?

A: For questions on how to obtain molnupiravir, please contact COVID19therapeutics@hhs.gov.

Q. Who may prescribe molnupiravir under the EUA?

A. Under the authorization, molnupiravir may only be prescribed for an individual patient by physicians, advanced practice registered nurses, and physician assistants that are licensed or authorized under state law to prescribe drugs in the therapeutic class to which molnupiravir belongs (i.e., anti-infectives).

Q: When should molnupiravir be administered to a patient?

A: Patients should talk to their healthcare provider to determine whether, based on their individual circumstances and whether alternative COVID-19 treatment options approved or authorized by FDA are accessible or clinically appropriate, they are eligible to receive molnupiravir. Patients should take molnupiravir as soon as possible after a diagnosis of COVID-19 has been made, and within five days of symptom onset.

More information about administration is available in the Fact Sheet for Health Care Providers.

Q: Does the EUA permit the use of molnupiravir as authorized in patients hospitalized *for reasons* other than COVID-19?

A: If a patient is hospitalized *for reasons other* than COVID-19, such as for an elective orthopedic procedure, and the patient reports mild-to-moderate symptoms of COVID-19, confirmed with positive results of a direct SARS-CoV-2 viral test, then treatment with molnupiravir is authorized, if the patient is also at high risk for progression to severe COVID-19, including hospitalization or death and the terms and conditions of the authorization are met, as detailed in the <u>Fact Sheet for Health Care Providers</u>.

Molnupiravir is also authorized for patients who require hospitalization after starting treatment with molnupiravir. These patients may complete the full five-day treatment course per the health care provider's discretion.

Q: Are there data showing treatment with molnupiravir may benefit adults with mild-to-moderate COVID-19 who are at high risk for progressing to severe COVID-19 and/or hospitalization?

A: Yes. The most important scientific evidence supporting the authorization of molnupiravir is from MOVe-OUT, a randomized, placebo-controlled, double-blind clinical trial studying molnupiravir for the treatment of non-hospitalized patients with mild-to-moderate COVID-19 who are at risk for progressing to severe COVID-19 and/or hospitalization. Eligible subjects were 18 years of age and older and had one or more pre-defined risk factors for disease progression: over 60 years of age, diabetes, obesity (BMI ≥30), chronic kidney disease, serious heart conditions, chronic obstructive pulmonary disease, or active



cancer. The study included symptomatic subjects not vaccinated against SARS CoV-2 and who had laboratory confirmed SARS-CoV-2 infection and symptom onset within five days of randomization

The main outcome measured in the trial was the percentage of people who were hospitalized or died due to any cause during 29 days of follow-up. Of the 709 people who received molnupiravir, 6.8% were hospitalized or died within this time period compared to 9.7% of the 699 people who received a placebo. This represented an adjusted relative risk reduction of molnupiravir compared to placebo of approximately 30% for all those randomized. Of the people who received molnupiravir, one died within this time period compared to nine people who received a placebo. The safety and effectiveness of molnupiravir for the treatment of COVID-10 continue to be evaluated.

Q: Are there requirements for health care facilities and prescribing health care providers as part of the EUA?

A: Yes.

- As part of the EUA, FDA requires health care providers who prescribe molnupiravir to report all
 medication errors and serious adverse events considered to be potentially related to
 molnupiravir through FDA's <u>MedWatch Adverse Event Reporting program</u>. Providers can
 complete and submit the report <u>online</u>; or download and complete the <u>form</u>, then submit it via
 fax at 1-800-FDA-0178. This requirement is outlined in the EUA's <u>Fact Sheet for Health Care</u>
 <u>Providers</u>. FDA MedWatch forms should also be provided to Merck Sharp & Dohme Corp.
- Health care facilities and providers must report therapeutics information and utilization data as directed by the U.S. Department of Health and Human Services.
- Healthcare providers must provide an electronic or hard copy of the "Fact Sheet for Patients,
 and Caregivers" prior to the patient receiving molnupiravir and must document that the patient
 has been given an electronic or hard copy of the "Fact Sheet for Patients and Caregivers".
- Healthcare providers must inform the patient or caregiver that:
 - Molnupiravir is an unapproved drug that is authorized for use under this Emergency Use Authorization.
 - Other therapeutics are currently approved or authorized for the same use as molnupiravir [see Emergency Use Authorization (1) - Information Regarding Available Alternatives for the EUA Authorized Use].
 - There are benefits and risks of taking molnupiravir as outlined in the "Fact Sheet for Patients and Caregivers."
 - o Merck Sharpe & Dohme has established a pregnancy surveillance program.
 - Females of childbearing potential should use a reliable method of contraception correctly and consistently, as applicable, for the duration of treatment and for four days after the last dose of molnupiravir.
 - Males of reproductive potential who are sexually active with females of childbearing potential should use a reliable method of contraception correctly and consistently during treatment and for at least three months after the last dose.
- The prescribing health care provider must assess whether an individual of childbearing potential is pregnant or not, if clinically indicated.
- Based on findings from animal reproduction studies, molnupiravir may cause fetal harm when administered to pregnant individuals. If molnupiravir is used during pregnancy, prescribing



- healthcare providers must communicate to the patient the known and potential benefits and the potential risks of molnupiravir use during pregnancy, as outlined in the "Fact Sheet for Patients and Caregivers".
- If the decision is made to use molnupiravir during pregnancy, the prescriber must document that the known and potential benefits and the potential risks of molnupiravir use during pregnancy, as outlined in the "Fact Sheet for Patients and Caregivers," were discussed with the patient.
- The prescribing healthcare provider must document that a pregnant individual was made aware
 of Merck Sharp & Dohme Corp's pregnancy surveillance program at 1-877-888-4231 or
 pregnancyreporting.msd.com.
 - o If the pregnant individual agrees to participate in the pregnancy surveillance program and allows the prescribing healthcare provider to disclose patient specific information to Merck Sharp & Dohme Corp., the prescribing healthcare provider must provide the patient's name and contact information to Merck Sharpe & Dohme.

Q: Do patient outcomes need to be reported under the EUA?

A: No, reporting of patient outcomes is not required under the EUA. However, reporting of all medication errors and serious adverse events considered to be potentially related to molnupiravir occurring during treatment is required.

Q: FDA has issued a number of EUAs, including for therapeutics. If state laws impose different or additional requirements on the medical product covered by an EUA, are those state laws preempted? A: As stated in FDA's Emergency Use Authorization of Medical Products and Related Authorities; Guidance for Industry and Other Stakeholders, "FDA believes that the terms and conditions of an EUA issued under section 564 preempt state or local law, both legislative requirements and common-law duties, that impose different or additional requirements on the medical product for which the EUA was issued in the context of the emergency declared under section 564." The guidance explains the basis for FDA's views on this subject.

Q: Can health care providers share the patient/caregiver fact sheet electronically?

A: Yes. The letter of authorization for molnupiravir authorizes healthcare providers to share the patient/caregiver fact sheet electronically.