

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

20-998 /S-013

ADMINISTRATIVE AND CORRESPONDENCE
DOCUMENTS

DEPARTMENT OF HEALTH AND HUMAN SERVICES PUBLIC HEALTH SERVICE FOOD AND DRUG ADMINISTRATION		REQUEST FOR CONSULTATION		
TO (Division/Office): Associate Director, Medication Error Prevention ODS, HFD-400 Rm. 15B-03, Parklawn		FROM: DAAODP, HFD-550 Carmen DeBellas, RPh, Chief Project Manager Jane A. Dean, RN, MSN, Project Manager x72536		
DATE 17 July 2002	IND NO.	NDA NO. 20-998	TYPE OF DOCUMENT NDA	DATE OF DOCUMENT
NAME OF DRUG Celebrex	PRIORITY CONSIDERATION Standard	CLASSIFICATION OF DRUG Cox 2 Inhibitor	DESIRED COMPLETION DATE August 19, 2002	
NAME OF FIRM: G.D. Searle L.L.C.				
REASON FOR REQUEST				
I. GENERAL				
<input type="checkbox"/> NEW PROTOCOL <input type="checkbox"/> PROGRESS REPORT <input type="checkbox"/> NEW CORRESPONDENCE <input type="checkbox"/> DRUG ADVERTISING <input type="checkbox"/> ADVERSE REACTION REPORT <input type="checkbox"/> MANUFACTURING CHANGE/ADDITION <input type="checkbox"/> MEETING PLANNED BY		<input type="checkbox"/> PRE-NDA MEETING <input type="checkbox"/> END OF PHASE II MEETING <input type="checkbox"/> RESUBMISSION <input type="checkbox"/> SAFETY/EFFICACY <input type="checkbox"/> PAPER NDA <input type="checkbox"/> CONTROL SUPPLEMENT		<input type="checkbox"/> RESPONSE TO DEFICIENCY LETTER <input type="checkbox"/> FINAL PRINTED LABELING <input type="checkbox"/> LABELING REVISION <input type="checkbox"/> ORIGINAL NEW CORRESPONDENCE <input type="checkbox"/> FORMULATIVE REVIEW <input type="checkbox"/> OTHER (SPECIFY BELOW) Proposed packaging of Patient Starter Package
II. BIOMETRICS				
STATISTICAL EVALUATION BRANCH		STATISTICAL APPLICATION BRANCH		
<input type="checkbox"/> TYPE A OR B NDA REVIEW <input type="checkbox"/> END OF PHASE II MEETING <input type="checkbox"/> CONTROLLED STUDIES <input type="checkbox"/> PROTOCOL REVIEW <input type="checkbox"/> OTHER (SPECIFY BELOW):		<input type="checkbox"/> CHEMISTRY REVIEW <input type="checkbox"/> PHARMACOLOGY <input type="checkbox"/> BIOPHARMACEUTICS <input type="checkbox"/> OTHER (SPECIFY BELOW):		
III. BIOPHARMACEUTICS				
<input type="checkbox"/> DISSOLUTION <input type="checkbox"/> BIOAVAILABILITY STUDIES <input type="checkbox"/> PHASE IV STUDIES		<input type="checkbox"/> DEFICIENCY LETTER RESPONSE <input type="checkbox"/> PROTOCOL-BIOPHARMACEUTICS <input type="checkbox"/> IN-VIVO WAIVER REQUEST		
IV. DRUG EXPERIENCE				
<input type="checkbox"/> PHASE IV SURVEILLANCE/EPIDEMIOLOGY PROTOCOL <input type="checkbox"/> DRUG USE e.g. POPULATION EXPOSURE, ASSOCIATED DIAGNOSES <input type="checkbox"/> CASE REPORTS OF SPECIFIC REACTIONS (List below) <input type="checkbox"/> COMPARATIVE RISK ASSESSMENT ON GENERIC DRUG GROUP		<input type="checkbox"/> REVIEW OF MARKETING EXPERIENCE, DRUG USE AND SAFETY <input type="checkbox"/> SUMMARY OF ADVERSE EXPERIENCE <input type="checkbox"/> POISON RISK ANALYSIS		
V. SCIENTIFIC INVESTIGATIONS				
<input type="checkbox"/> CLINICAL		<input type="checkbox"/> PRECLINICAL		
COMMENTS/SPECIAL INSTRUCTIONS:				
Please review attached proposed packaging for Patient Starter Package of Celebrex. If you have any questions, please call Jane A. Dean, Project Manager at 301-827-2536. Hard copy of packaging is being sent by mail. Thank you.				
SIGNATURE OF REQUESTER Jane A. Dean, RN, MSN for Carmen DeBellas, RPh		METHOD OF DELIVERY (Check one) <input checked="" type="checkbox"/> MAIL <input type="checkbox"/> HAND		
SIGNATURE OF RECEIVER		SIGNATURE OF DELIVERER		

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/s/

Jane Dean
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CONSULTATION RESPONSE

**DIVISION OF MEDICATION ERRORS AND TECHNICAL SUPPORT
OFFICE OF DRUG SAFETY
(DMETS; HFD-420)**

DATE RECEIVED: July 29, 2002

DUE DATE: August 19, 2002

ODS CONSULT #: 02-0164

TO: Lee Simon, MD
Director, Division of Anti-Inflammatory, Analgesic, and Ophthalmologic Drug Products
HFD-550

THROUGH: Jane Dean, RN, MSN
Project Manager
HFD-550

PRODUCT NAME:
Celebrex - (Celecoxib Capsules)
200 mg and 400 mg

NDA SPONSOR: Pharmacia Corporation

NDA #: 20-998/SCS-013

SAFETY EVALUATOR: Charlie Hoppes, RPh, MPH

SUMMARY: In response to a consult from the Division of Anti-Inflammatory, Analgesic, and Ophthalmologic Drug Products (HFD-550), the Division of Medication Errors and Technical Support (DMETS) conducted a review of the proposed Professional Sample Labeling _____ from a safety perspective.

DMETS RECOMMENDATION:

DMETS recommends implementation of the labeling revisions outlined in section III of this review to minimize potential errors with the use of this product.

Carol Holquist, RPh
Deputy Director
Division of Medication Errors and Technical Support
Office of Drug Safety
Phone: (301) 827-3242 Fax: (301) 443-5161

Jerry Phillips, RPh
Associate Director
Office of Drug Safety
Center for Drug Evaluation and Research
Food and Drug Administration

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**Division of Medication Errors and Technical Support (DMETS)
Office of Drug Safety
HFD-420; Rm. 15B32
Center for Drug Evaluation and Research**

DATE OF REVIEW: August 7, 2002
NDA: 20-998/SCS-013
NAME OF DRUG: Celebrex - (Celecoxib Capsules) 200 mg and 400 mg
NDA HOLDER: Pharmacia Corporation

I. INTRODUCTION:

This consult is written in response to a request from the Division of Anti-inflammatory, Analgesic, and Ophthalmologic Drug Products, (HFD-550) for an assessment of the Professional Sample labeling for Celebrex. The Professional Sample labeling submitted combines a 200 mg capsule and a 400 mg capsule of Celebrex (celecoxib) in a Professional Sample card for the first day treatment of acute pain. The sponsor has given this sample the moniker, _____ The 400 mg capsule is currently pending approval as part of 20-998/SCS-013. The supplement is being reviewed by HFD-550 but also by HFD-180, since Celebrex has been approved for the indication Familial Adenomatous Polyposis (FAP), a condition characterized by the proliferation of adenomatous colorectal polyps. A consult was sent from HFD-550 to DDMAC on 7/18/02. DMETS will defer to the expertise of DDMAC concerning promotional statements on this labeling, e.g., _____

PRODUCT INFORMATION

Celebrex (celecoxib) Capsules is indicated for relief of the signs and symptoms of osteoarthritis, relief of the signs and symptoms of rheumatoid arthritis in adults, for the management of acute pain in adults, for the treatment of primary dysmenorrhea, and to reduce the number of adenomatous colorectal polyps in familial adenomatous polyposis (FAP), as an adjunct to usual care (e.g., endoscopic surveillance, surgery). The recommended dosage for acute pain is 400 mg initially, followed by an additional 200 mg dose if needed on the first day. On subsequent days, the recommended dose is 200 mg twice daily as needed.

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II. SAFETY EVALUATOR RISK ASSESSMENT

DMETS has reviewed the professional sample labeling submitted and has the following comments.

A. To address the concern that the patient takes both capsules in one dose (600 mg), we have made labeling recommendations.

B.



Management of Acute Pain and Treatment of Primary Dysmenorrhea: The recommended dose of CELEBREX is 400 mg initially, followed by an additional 200 mg dose if needed on the first day. On subsequent days, the recommended dose is 200 mg twice daily as needed.

Please note that no guidance regarding a time to wait after the first dose is provided in the professional insert labeling. Please request that the sponsor make this clarification for the Professional Sample and for the package insert labeling (see labeling comments A.2.c. and B. below).

C. It is unlikely that the 200 mg and 400 mg capsule provided with the professional sample will come from the same lot and may have different expiration dates. Please ensure that the sponsor has made provisions to label this product with the correct lot number and expiration date.

III. LABELING, PACKAGING, AND SAFETY RELATED ISSUES:

In the review of the Professional Sample Labeling of Celebrex, DMETS has focused on safety issues relating to possible medication errors and has identified several areas of possible improvement, which might minimize potential user error.

A. PROFESSIONAL SAMPLE LABELING

1. Front Panel

Increase the prominence of the statement, "Contains: One 400-mg capsule • One 200-mg capsule".

2. Panel - Inside Back

a. Under the heading "Day 1", increase the prominence of the capsule strengths.

b. Using the same font as the day one heading, include a second heading, with the text, "If Needed".

c.

3. Back Panel

Increase the prominence of the direction to push the capsule through foil.

B. CELEBREX PACKAGE INSERT LABELING

(DOSAGE AND ADMINISTRATION - Management of Acute Pain and Treatment of Primary Dysmenorrhea)

IV. RECOMMENDATIONS:

DMETS recommends the labeling revisions as outlined in section III of this review that might lead to safer use of the product. We would be willing to revisit these issues if the Division receives another draft of the labeling from the manufacturer.

DMETS would appreciate feedback of the final outcome of this consult. We would be willing to meet with the Division for further discussion, if needed. If you have further questions or need clarifications, please contact Sammie Beam, project manager, at 301-827-3242.

Charlie Hoppes, RPh, MPH
Safety Evaluator
Division of Medication Errors and Technical Support
Office of Drug Safety

Concur:

Alina Mahmud, RPh
Team Leader
Division of Medication Errors and Technical Support
Office of Drug Safety

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/s/

Charles Hoppes
8/15/02 07:17:36 AM
PHARMACIST

Alina Mahmud
8/15/02 08:38:15 AM
PHARMACIST

Jerry Phillips
8/16/02 10:26:52 AM
DIRECTOR

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Jane Dean
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DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville, MD 20857

NDA 20-998/S-013

Pharmacia Corporation
Attention: Eva Essig, Ph.D.
Associate Director Regulatory Affairs
4901 Searle Parkway
Skokie, IL 60077

Dear Dr. Essig:

We acknowledge receipt of your October 16, 2002 submission containing final printed labeling in response to our August 29, 2002 letter approving your supplemental new drug applications for Celebrex (celecoxib) capsules, 100 mg, 200 mg and 400 mg.

We have reviewed the labeling that you submitted in accordance with our August 29, 2002 letter and we find it acceptable.

If you have any questions, please call Ms. Jane A. Dean, RN, MSN, Regulatory Health Project Manager, at 301-827-2090.

Sincerely,

{See appended electronic signature page}

Lawrence Goldkind, M.D.
Deputy Director
Division of Anti-Inflammatory, Analgesic, and
Ophthalmic Drug Products, HFD-550
Office of Drug Evaluation V
Center for Drug Evaluation and Research

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Lawrence Goldkind
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