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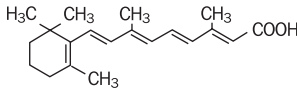
Tretinoin Gel, USP
(Microsphere) 0.1% and 0.04%

FOR TOPICAL USE ONLY. NOT FOR OPHTHALMIC, ORAL, OR INTRAVAGINAL USE.

DESCRIPTION

Tretinoin gel, USP (microsphere) 0.1% and 0.04% is a formulation containing 0.1% or 0.04%, by weight, tretinoin for topical treatment of acne vulgaris. This formulation uses methyl methacrylate/glycol dimethacrylate crosspolymer porous microspheres to enable inclusion of the active ingredient, tretinoin, in an aqueous gel. Other components of this formulation are purified water, carbomer 974P, glycerin, disodium EDTA, propylene glycol, sorbic acid, PPG-20 methyl glucose ether distearate, cyclomethicone and dimethicone copolyol, benzyl alcohol, tromamine, and butylated hydroxytoluene.

Chemically, tretinoin is *all-trans*-retinoic acid, also known as (all-*E*)-3,7-dimethyl-9 (2,6,6-trimethyl-1-cyclohexen-1-yl)-2,4,6,8-nonatetraenoic acid. It is a member of the retinoid family of compounds, and a metabolite of naturally occurring Vitamin A. Tretinoin has a molecular weight of 300.44. Tretinoin has the following structure:



CLINICAL PHARMACOLOGY

Tretinoin is a retinoid metabolite of Vitamin A that binds to intracellular receptors in the cytosol and nucleus, but cutaneous levels of tretinoin in excess of physiologic concentrations occur following application of a tretinoin-containing topical drug product.

Although tretinoin activates three members of the retinoic acid (RAR) nuclear receptors (RAR α , RAR β , and RAR γ) which may act to modify gene expression, subsequent protein synthesis, and epithelial cell growth and differentiation, it has not been established whether the clinical effects of tretinoin are mediated through activation of retinoic acid receptors, other mechanisms, or both.

Mode of Action: Although the exact mode of action of tretinoin is unknown, current evidence suggests that the effectiveness of tretinoin in acne is due primarily to its ability to modify abnormal follicular keratinization. Comedones form in follicles with an excess of keratinized epithelial cells. Tretinoin promotes detachment of cornified cells and the enhanced shedding of comedocytes from the follicle. By increasing the mitotic activity of follicular epithelia, tretinoin also increases the turnover rate of thin, loosely-adherent comedocytes. Through these actions, the comedo contents are extruded and the formation of the microcomedo, the precursor lesion of acne vulgaris, is reduced.

Additionally, tretinoin acts by modulating the proliferation and differentiation of epidermal cells. These effects are mediated by tretinoin's interaction with a family of nuclear retinoic acid receptors. Activation of these nuclear receptors causes changes in gene expression. The exact mechanisms whereby tretinoin-induced changes in gene expression regulate skin function are not understood.

Pharmacokinetics: Tretinoin is a metabolite of Vitamin A metabolism in man. Percutaneous absorption, as determined by the cumulative excretion of radiolabeled drug into urine and feces, was assessed in 44 healthy men and women. Estimates of *in vivo* bioavailability, mean (SD)%, following both single and multiple daily applications, for a period of 28 days of the 0.1% gel, were 0.82 (0.11)% and 1.41 (0.54)%, respectively. The plasma concentrations of tretinoin were 0.20 (0.03) ng/mL and 0.20 (0.03) ng/mL, respectively, ranged from 1 to 3 ng/mL and were essentially unaltered after either single or multiple daily applications

of tretinoin gel, USP (microsphere) 0.1% relative to baseline levels. Clinical pharmacokinetic studies have not been performed with tretinoin gel, USP (Microsphere) 0.04%.

INDICATIONS AND USAGE

Tretinoin gel, USP (microsphere) 0.1% and 0.04% is indicated for topical application in the treatment of acne vulgaris. The safety and efficacy of the use of this product in the treatment of other disorders have not been established.

CLINICAL STUDIES

Tretinoin gel, USP (microsphere) 0.1%: In two vehicle-controlled studies tretinoin gel, USP (microsphere) 0.1% applied once daily was significantly more effective than vehicle in reducing the severity of acne lesion counts. The mean reductions in lesion counts from baseline after treatment for 12 weeks are shown in the following table:

	Mean Percent Reduction in Lesion Counts Tretinoin gel, USP (microsphere) 0.1%			
	Tretinoin gel, USP (microsphere) 0.1%		Vehicle gel	
	Study #1 72 pts	Study #2 71 pts	Study #1 72 pts	Study #2 67 pts
Non-inflammatory lesion counts	49%	32%	22%	3%
Inflammatory lesion counts	37%	29%	18%	24%
Total lesion counts	45%	32%	23%	16%

Tretinoin gel, USP (microsphere) 0.1% was also significantly superior to the vehicle in the investigator's global evaluation of the clinical response. In Study #1, thirty-five percent (35%) of patients using tretinoin gel, USP (microsphere) 0.1% achieved an excellent result, as compared to eleven percent (11% of patients on the vehicle control. In Study #2, twenty-eight percent (28%) of patients using tretinoin gel, USP (microsphere) 0.1% achieved an excellent result, as compared to nine percent (9%) of the patients on vehicle control.

Tretinoin gel, USP (microsphere) 0.04%: In two vehicle-controlled clinical studies tretinoin gel, USP (microsphere) 0.04% applied once daily was more effective (p<0.05) than vehicle in reducing the acne lesion counts. The mean reductions in lesion counts from baseline after treatment for 12 weeks are shown in the following table:

	Mean Percent Reduction in Lesion Counts Tretinoin gel, USP (microsphere) 0.04%			
	Tretinoin gel, USP (microsphere) 0.04%		Vehicle gel	
	Study #1 108 pts	Study #2 111 pts	Study #1 110 pts	Study #2 103 pts
Non-inflammatory lesion counts	37%	29%	-2%*	14%
Inflammatory lesion counts	44%	41%	13%	30%
Total lesion counts	40%	35%	8%	20%

*That is, a mean percent increase of 2%

Tretinoin gel, USP (microsphere) 0.04% was also superior (p<0.05) to the vehicle in the investigator's global evaluation of the clinical response. In Study #1, fourteen percent (14%) of patients using tretinoin gel, USP (microsphere) 0.04% achieved an excellent result, as compared to five percent (5%) of patients on the vehicle control. In Study #2, nineteen percent (19%) of patients using tretinoin gel, USP (microsphere) 0.04% achieved an excellent result, as compared to nine percent (9%) of the patients on vehicle control.

No studies were conducted comparing the efficacy of tretinoin gel, USP (microsphere) 0.04% to tretinoin gel, USP (microsphere) 0.1%. There is no evidence that tretinoin gel, USP (microsphere) 0.1% is more efficacious than tretinoin gel, USP (microsphere) 0.04% or that tretinoin gel, USP (microsphere) 0.04% is safer than tretinoin gel, USP (microsphere) 0.1%.

CONTRAINDICATIONS

This drug is contraindicated in individuals with a history of sensitivity reactions to any of its components. It should be discontinued if hypersensitivity to any of its ingredients is noted.

PRECAUTIONS

General

- The skin of certain individuals may become excessively dry, red, swollen, or blistered. If the degree of irritation warrants, patients should be directed to temporarily reduce the amount or frequency of application of the medication, discontinue use temporarily, or discontinue use all together. Efficacy at reduced frequencies of application has not been established. If a reaction suggesting sensitivity occurs, use of the medication should be discontinued. Excessive skin dryness may also be experienced; if so, use of an appropriate emollient during the day may be helpful.
- Unprotected exposure to sunlight, including sunlamps, should be minimized during the use of tretinoin gel, USP (microsphere) 0.1% and 0.04%, and patients with sunburn should be advised not to use the product until fully recovered because of heightened susceptibility to sunlight as a result of the use of tretinoin. Patients who may be required to have considerable sun exposure due to occupation and those with inherent sensitivity to the sun should exercise particular caution. Use of sunscreen products (SPF 15) and protective clothing over treated areas are recommended when exposure cannot be avoided.
- Weather extremes, such as wind or cold, also may be irritating to patients under treatment with tretinoin.
- Tretinoin gel, USP (microsphere) 0.1% and 0.04% should be kept away from the eyes, the mouth, paranasal creases of the nose, and mucous membranes.
- Tretinoin has been reported to cause severe irritation on eczematous skin and should be used with utmost caution in patients with this condition.

Information for Patients: See Patient Information Leaflet.

Drug Interactions: Concomitant topical medication, medicated or abrasive soaps and cleansers, products that have a strong drying effect, products with high concentrations of alcohol, astringents, or spices should be used with caution because of possible interaction with tretinoin. Avoid contact with the peel of lemons. Particular caution should be exercised with the concomitant use of topical over-the-counter acne preparations containing benzoyl peroxide, sulfur, resorcinol, or salicylic acid with tretinoin gel, USP (microsphere) 0.1% and 0.04%. It also is advisable to allow the effects of such preparations to subside before use of tretinoin gel, USP (microsphere) 0.1% or 0.04% is begun.

Carcinogenesis, Mutagenesis, Impairment of Fertility: In a 91-week dermal study in which CD-1 mice were administered 0.017% and 0.035% formulations of tretinoin, cutaneous squamous cell carcinomas and papillomas in the treatment area were observed in some female mice. These concentrations are near the tretinoin concentration of these clinical formulations (0.1% and 0.04%). A dose-related incidence of liver tumors in male mice was observed at those same doses. The maximum systemic doses associated with the administered 0.017% and 0.035% formulations are 0.5 and 1.0 mg/kg/day, respectively. These doses are two and four times the maximum human systemic dose applied topically, when normalized for total body surface area. The biological significance of these findings is not clear because they occurred at doses that exceeded the dermal maximally tolerated dose (MTD) of tretinoin and because they were within the background natural occurrence rate for these tumors in this strain of mice. There was no evidence of carcinogenic potential when 0.025 mg/kg/day of tretinoin was administered topically to mice (0.1 times the maximum human systemic dose, normalized for total body surface area). For purposes of comparisons of the animal exposure to systemic human exposure, the maximum human systemic dose applied topically is defined as 1 gram of tretinoin gel, USP (microsphere) 0.1% applied daily to a 50 kg person (0.02 mg tretinoin/kg body weight).

Dermal carcinogenicity testing has not been performed with tretinoin gel, USP (microsphere) 0.1% or 0.04%.

Studies in hairless albino mice suggest that concurrent exposure to tretinoin may enhance the tumorigenic potential of carcinogenic doses of UVB and UVA light from a solar simulator. This effect has been confirmed in a later study in pigmented mice, and dark pigmentation did not overcome the enhancement of photocarcinogenesis by 0.05% tretinoin. Although the significance of these studies to humans is not clear, patients should minimize exposure to sunlight or artificial ultraviolet irradiation sources.

The mutagenic potential of tretinoin was evaluated in the Ames assay and in the *in vivo* mouse micronucleus assay, both of which were negative.

The components of the microspheres have shown potential for genetic toxicity and teratogenesis. EGDMA, a component of the expicent acrylates copolymer, was positive for induction of structural chromosomal aberrations in the *in vitro* chromosomal aberration assay in mammalian cells in the absence of metabolic activation, and negative for genetic toxicity in the Ames assay, the HGPRT forward mutation assay, and the mouse micronucleus assay.

- you have eczema or other skin conditions: **tretinoin gel, USP (microsphere)** can cause severe irritation if used on eczema.
 - you are allergic to any of the ingredients in **tretinoin gel, USP (microsphere)**.
- Tell your doctor before using tretinoin gel, USP (microsphere) if:**
- you are pregnant, planning to become pregnant, or may be pregnant.
- The active ingredient is tretinoin. See the list of other ingredients at the end of this label.
- Who should not use tretinoin gel, USP (microsphere)?**
- you are sunburned. Do not use **tretinoin gel, USP (microsphere)** until your skin has fully recovered.
- Do not use tretinoin gel, USP (microsphere) if:**
- you are recovering from a severe sunburn.
- Who should not use tretinoin gel, USP (microsphere)?**
- you are recovering from a severe sunburn.
- Do not use tretinoin gel, USP (microsphere) if:**
- you are recovering from a severe sunburn.

Remove this portion before dispensing

What is tretinoin gel, USP (microsphere)?
Tretinoin gel, USP (microsphere) is a prescription medicine that you put on your skin to treat acne. Acne is a condition in which the skin has blackheads, whiteheads, and other pimples.

Who should not use tretinoin gel, USP (microsphere)?
 Do not use **tretinoin gel, USP (microsphere)** if:

- you are recovering from a severe sunburn.

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PATIENT INFORMATION
Tretinoin gel, USP (microsphere) 0.1% and 0.04%
For Topical Use Only

- you are breast feeding. We do not know if **tretinoin gel, USP (microsphere)** can pass through your milk to the baby.
 - you are using any other medicines to treat your acne. Do not use other medicines unless they are recommended by your doctor. Other acne medicines used with **tretinoin gel, USP (microsphere)** may make your face more likely to be dry and red and cause it to peel.
 - you are taking medicines for other health conditions. Some medicines may make your skin more sensitive to sunlight. Tell your doctor about all medicines that you are taking. (See **Who should not use tretinoin gel, USP (microsphere)?** and **What should I avoid while using tretinoin gel, USP (microsphere)?**)
- How should I use tretinoin gel, USP (microsphere)?**
- Wash your skin with mild, non-medicated soap and dry your skin gently. Apply **tretinoin gel, USP (microsphere)** once a day in the evening, or as directed by your doctor.
- Tip: Squeeze a small amount of **tretinoin gel, USP (microsphere)** about the size of a pea (on your fingertip). Dab **tretinoin gel, USP (microsphere)** evenly over the entire surface of your face by gently smoothing it into your skin.
- Do not use **tretinoin gel, USP (microsphere)** near your mouth, eyes, or open sores, or on the corners of your nose. Spread **tretinoin gel, USP (microsphere)** evenly over the areas from these areas when putting **tretinoin gel, USP (microsphere)** on your skin.
- Do not use more **tretinoin gel, USP (microsphere)** than your doctor has prescribed. Do not use **tretinoin gel, USP (microsphere)** more often than your doctor has told you. Do not use **tretinoin gel, USP (microsphere)** if you have a severe sunburn. Do not use **tretinoin gel, USP (microsphere)** if you have a severe sunburn. Do not use **tretinoin gel, USP (microsphere)** if you have a severe sunburn. Do not use **tretinoin gel, USP (microsphere)** if you have a severe sunburn.
- You can use a facial cream or lotion each morning after washing your face. It should contain a sun protection factor (SPF) of 15 or higher. Follow your doctor's advice because you need to use a cream or lotion that will not make your acne worse. You may use cosmetics with **tretinoin gel, USP (microsphere)**. However, clean your face before using cosmetics and remove cosmetics from your skin before using **tretinoin gel, USP (microsphere)**. Talk to your doctor about recommended cosmetics.



Reference ID: 3120405

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/s/

BEVERLY WEITZMAN
04/23/2012

JOHN F GRACE
04/25/2012