CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

22-058

PROPRIETARY NAME REVIEW(S)

Division of Medication Errors and Technical Support (DMETS)
Office of Surveillance and Epidemiology
White Oak Bldg #22, Mailstop 4447
Center for Drug Evaluation and Research

PROPRIETARY NAME, LABEL, AND LABELING REVIEW

DATE OF REVIEW: August 16, 2006

NDA#: 22-058

NAME OF DRUG: Supprelin LA
(Histrelin acetate) implant
50 mg

NDA HOLDER: Valera Pharmaceuticals

I. INTRODUCTION:

This consult was written in response to a request from the Division of Metabolism and Endocrinology Products (HFD-510), for assessment of the proprietary name, Supprelin LA, regarding potential name confusion with other proprietary or established drug names. Package insert labeling was provided for review and comment.

PRODUCT INFORMATION

Supprelin LA (histrelin acetate) implant is a gonadotropin releasing hormone analog indicated for the treatment of children with central precocious puberty. It contains 50 mg of histrelin and delivers approximately 65 micrograms of histrelin per day over 12 months. The implant is inserted subcutaneously in the inner aspect of the upper arm and provides continuous release of histrelin for 12 months of hormonal therapy. The recommended dose is one implant for 12 months.

II. RISK ASSESSMENT:

The medication error staff of DMETS conducted a search of several standard published drug product reference texts[1,2] as well as several FDA databases[3,4] for existing drug names which sound-alike or look-alike to Supprelin LA to a degree where potential confusion between drug names could occur under the usual clinical practice settings. A search of the electronic online version of the U.S. Patent and Trademark Office's Text and Image Database was also conducted[5]. The Saegis[6] Pharma-In-Use database was searched for drug names with potential for confusion. An expert panel discussion was conducted to review all findings from the searches. In addition, DMETS conducted three prescription analysis studies consisting of two written prescription studies (pharmacy requisition: Sample A and Sample B) and one verbal prescription study, involving health care practitioners within FDA. This exercise was conducted to simulate the prescription ordering process in order to evaluate potential errors in handwriting and verbal communication of the name.

A. EXPERT PANEL DISCUSSION (EPD)

An Expert Panel discussion was held by DMETS to gather professional opinions on the safety of the proprietary name, Supprelin LA. Potential concerns regarding drug marketing and promotion related to the proposed name was also discussed. This group is composed of DMETS Medication Errors Prevention Staff and representation from the Division of Drug Marketing, Advertising, and Communications (DDMAC). The group relies on their clinical and other professional experiences and a number of standard references when making a decision on the acceptability of a proprietary name.

1. DDMAC finds the proprietary name, Supprelin LA, acceptable from a promotional perspective.

2. The Expert Panel identified ten proprietary names that were thought to have the potential for confusion with Supprelin LA. These products are listed in Table 1 (see page 4), along with the dosage forms available and usual dosage.

APPEARS THIS WAY ON ORIGINAL

[1] MICROMEDEX Integrated Index, 2006, MICROMEDEX, Inc., 6200 South Syracuse Way, Suite 300, Englewood, Colorado 80111-4740, which includes all products/databases within ChemKnowledge, DrugKnowledge, and RegsKnowledge Systems.
[2] Facts and Comparisons, online version, Facts and Comparisons, St. Louis, MO.
[3] AMF Decision Support System [DSS], the Division of Medication Errors and Technical Support [DMETS] database of Proprietary name consultation requests, New Drug Approvals 98-06, and the electronic online version of the FDA Orange Book.
[4] Phonetic and Orthographic Computer Analysis (POCA).
[5] WWW location http://www.uspto.gov/tmdb/index.html.
[6] Data provided by Thomson & Thomson's SAEGIS ™ Online Service, available at www.thomson-thomson.com.

Table 1: Potential Sound-Alike/Look-Alike Names Identified by DMETS Expert Panel

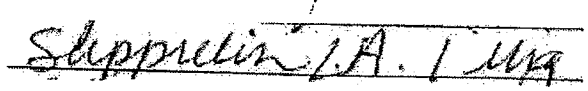
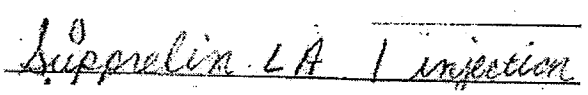
Product Name*	Dosage form(s), Established name	Usual adult dose*	Other**
Supprelin LA	Histrelin Subcutaneous implant 50 mg (Delivers 65 mcg of histrelin per day)	Central precocious puberty: One implant for 12 months	N/A
Supprelin *(This product was discontinued in 2003; year of last recorded sales was 2001)*	Histrelin acetate Injection 200 mcg/mL; 120 mcg per vial 500 mcg/mL; 300 mcg per vial 1000 mcg/mL; 600 mcg per vial	Central precocious puberty: 10 mcg/kg of body weight administered as a single daily subcutaneous injection.	LA/SA
Spherulin	Coccidioidin Injection 1:100 w/v; 1 mL vial 1:10 w/v; 1 mL vial	Coccidioidomycosis, diagnosis: *Skin test*: 0.1 mL of a 1:100 dilution intradermally on the flexor surface of the forearm. Perform the 1:10 dilution skin test only on persons nonreactive to the 1:100 dilution.	LA
Suppresia-HP (OTC product)	Pine nut oil 375 mg and Hoodia gordonii extract (20:1) 125 mg Softgel	Weight loss aid: 1 to 2 softgels one hour before a meal with an 8 ounce glass of water.	LA
Support 500 Support	Multiple vitamin with minerals Softgel Oral liquid	Vitamin supplement: Dosing information not available.	LA
Supress DX Pediatric	Oral liquid (drops) (Unable to find product specific information.)	Unable to find product specific dosing information.	LA
Supeudol *(Foreign drug) Canada*	Oxycodone hydrochloride (Unable to find product specific information.)	Moderate to severe chronic pain: Dose is individualized. Generally adult doses are between 10 and 40 mg every 12 hours.	LA
Suppressin *(Foreign drug) Austria*	Doxazosin mesylate (Unable to find product specific information.)	Unable to find product specific dosing information.	LA/SA
Suppress Cough *(Product is no longer marketed)*	Dextromethorphan hydrobromide Strips 2.5 mg	Cough suppressant (Unable to find product specific dosing information.)	LA
Serpalan *(This brand is no longer marketed, generics are available)*	Reserpine Tablets 0.1 mg and 0.25 mg	Mild hypertension: In the average patient not receiving other antihypertensive agents, the usual initial dosage is 0.5 mg once daily for 1or 2 weeks. For maintenance, reduce to 0.1 mg to 0.25 mg once daily. Psychiatric disorders: The usual initial dosage is 0.5 mg daily, but may range from 0.1 mg to 1 mg. Adjust dosage upward or downward according to the patient's response.	LA

* Frequently used, not all-inclusive.
** L/A (look-alike), S/A (sound-alike)

B. PRESCRIPTION ANALYSIS STUDIES

1. Methodology:

Three separate studies were conducted within the Centers of the FDA for the proposed proprietary name to determine the degree of confusion of Supprelin LA with marketed U.S. drug names (proprietary and established) due to similarity in visual appearance with handwritten prescriptions or verbal pronunciation of the drug name. Each study employed a total of 126 health care professionals (pharmacists, physicians, and nurses). This exercise was conducted in an attempt to simulate the prescription ordering process. Pharmacy requisition orders (Sample A and Sample B) were written, each consisting of a combination of marketed and unapproved drug products and a requisition order for Supprelin LA (see below). These requisitions were optically scanned and one requisition was delivered to a random sample of the participating health professionals via e-mail. In addition, the pharmacy requisition order was recorded on voice mail. The voice mail message was then sent to a random sample of the participating health professionals for their interpretations and review. After receiving either the written or verbal pharmacy requisition orders, the participants sent their interpretations of the orders via e-mail to the medication error staff.

HANDWRITTEN PRESCRIPTION	VERBAL PRESCRIPTION
Pharmacy Requisition Sample A: 	"Supprelin LA One injection"
Pharmacy Requisition Sample B: 	

2. Results:

Two respondents in the pharmacy requisition Sample A study omitted the modifier "LA" and misinterpreted the proposed name as "Supprelin", a U.S. product that was discontinued in 2003. See Appendix A (page 14) for the complete listing of interpretations from the verbal and written studies.

C. ADVERSE EVENT REPORTING SYSTEM (AERS) AND DRUG QUALITY REPORTING SYSTEM (DQRS) SEARCHES

Supprelin was approved on December 24, 1991[7] and discontinued on September 17, 2003[8]. However, prior to product discontinuation, the product had not been distributed since 2000[9]. The year of last recorded sales of the product was 2001[10]. Since the sponsor proposes to to use the root name, Supprelin, the FDA *Adverse Event Reporting System* (AERS) and the *Drug Quality*

[7] Drugs@FDA, http://www.accessdata.fda.gov/scripts/cder/drugsatfda/, accessed August 2, 2006.
ecision Support System (DSS), accessed August 2, 2006.
Annual Report for Supprelin (NDA 19-836) covering the period 12/24/00 through 12/23/01.
[10] Data provided by Thomson & Thomson's SAEGIS ™ Online Service, available at www.thomson-thomson.com.

Reporting System (DQRS) were searched for all postmarketing cases concerning medication errors associated with Supprelin.

AERS was searched using the MedDRA High Level Group Term "Medication Error" and the names "Supprelin", "Supp%", "histrelin acetate", and histr%". Additionally, the DQRS database was searched for medication error cases concerning Supprelin and histrelin acetate. Using this search strategy, there were no reports retrieved from either database.

D. SAFETY EVALUATOR RISK ASSESSMENT

In reviewing the proprietary name Supprelin LA, the primary concerns relating to look-alike and sound-alike confusion with Supprelin LA are: Supprelin, Spherulin, Suppresia-HP, Support, Support 500, Supeudol, Supress DX, Suppressin, Suppress Cough, and Serpalan. DMETS also evaluated the appropriateness of the modifier "LA". During the review, we noted concerns with the proposed established name as well.

Additionally, DMETS conducted prescription studies to simulate the prescription ordering process. In this case, there was confirmation that Supprelin LA could be confused with Supprelin, a U.S. drug product that was discontinued in 2003.

Upon further analysis of the names identified as concerning, the names Support, Support 500, Supress DX, Suppress Cough, and Serpalan were not reviewed further due to a lack of convincing look-alike/sound-alike similarities with Supprelin LA in addition to numerous differentiating product characteristics such as the product strength, indication of use, frequency of administration, route of administration, dosage form and/or the product has been discontinue Additionally, Supeudol (oxycodone in Canada) and Suppressin (doxazosin mesylate in Austria) were not considered further because they are foreign products and none are exact matches with Supprelin LA, they have limited areas of marketing and/or there is limited information concerning the products.

The remaining concerns are discussed below.

1. Look-Alike and Sound-Alike Names

   a. Supprelin LA is a product extension of the once marketed Supprelin (histrelin acetate). Supprelin contained the same active ingredient and had the same indication of use as Supprelin LA but was available in a different dosage form requiring daily dosage administration. Supprelin was indicated for the treatment of central precocious puberty (CPP) and the recommended dose was 10 mcg/kg of body weight administered as a single daily subcutaneous injection. Supprelin was available in the following strengths: 200 mcg/mL (120 mcg per vial), 500 mcg/mL (300 mcg per vial), and 1000 mcg/mL (600 mcg per vial). According to the SAEGIS database, the year of last recorded sales of Supprelin was 2001[11]. Furthermore, distribution of Supprelin ceased in the year 2000[12]and the product was discontinued in 2003[13]. There are also no generically equivalent products available.

[11] Data provided by Thomson & Thomson's SAEGIS ™ Online Service, available at www.thomson-thomson.com.

[12] Annual Report for Supprelin (NDA 19-836) covering the period 12/24/00 through 12/23/01.

[13] Decision Support System (DSS), accessed August 2, 2006.

Although both products have the identical root name, Supprelin, it is not likely that Supprelin will be confused with Supprelin LA since Supprelin has been discontinued and there are no generically equivalent products available. The larger question is to determine if there is a need for the modifier "LA" since Supprelin is no longer available. See Section II(D)(2), page 8, for a discussion on this modifier.

b. Spherulin was identified as a name with similar appearance to the root name Supprelin of Supprelin LA. Spherulin (coccidioidin) is a skin test used to help diagnose coccidioidomycosis. The dose is 0.1 mL of a 1:100 dilution, intradermally. Spherulin is available in the following concentrations and size: 1:100 w/v and 1:10 w/v, 1 mL multidose vials.

Spherulin and the root name Supprelin may look similar if the modifier "LA" is omitted from the name Supprelin LA. The omission of modifiers from prescription orders are a common source of error. Research supporting the omission of modifiers was published in the Journal of General Internal Medicine. Timothy S. Lesar, PharmD, conducted research at a 631-bed teaching hospital in order to evaluate prescribing errors involving medication dosage forms. Analysis of 402 medication errors that occurred over a 16-month period (September 1, 1999 to December 31, 2000) demonstrated that the most common error was due to the failure to specify a controlled-release dosage formulation through the use of a modifier (280 cases or 69.7%).[14] Studies such as this one support DMETS' concern that healthcare professionals may omit modifiers.

The look-alike similarities of this name pair are due to the fact that Spherulin and Supprelin contain nine letters and five of the first six letters are the same, although not in the same sequence (**Spheru** vs. **Suppre**). Additionally, both names end with the same three letters ("lin") which also contributes to their visual similarity.

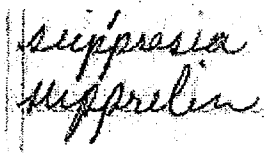
However, these products differ in route of administration (intradermal vs. subcutaneous), strength (1:100 and 1:10 vs. 50 mg), and dose (0.1 mL vs. 1 implant) which will help to differentiate the names. For example, a prescription for Spherulin would have to state the strength desired since it is available in multiple strengths. Although there are some orthographic similarities between these names, the product differences will minimize the potential to confuse Spherulin and Supprelin LA.

Supprelin Spherulin

c. Suppresia-HP was identified as a name with similar appearance to the root name Supprelin of Supprelin LA. Suppresia-HP is an over-the-counter product used as a weight loss aid. It contains pine nut oil 375 mg and Hoodia gordonii extract (20:1) 125 mg, in a softgel capsule. The recommended dose is 1 or 2 capsules one hour before a meal with an 8 ounce glass of water.

[14] Lesar, Timothy S. Prescribing Errors Involving Medication Dosage Forms. J Gen Intern Med. 2002;17:579-87.

Suppresia-HP and Supprelin LA may look similar when the modifiers "HP" and "LA" are omitted from the names. The look-alike similarities are due to the fact that both root names contain nine letters and the first six letters of both names a exactly the same ("Suppre"). However, the endings ("sia" vs. "lin") do not look similar because the letter "l" in Supprelin has an upstroke which helps to differentiate the names. Additionally, the modifiers in the names do not look similar ("HP" vs. "LA").



Suppresia-HP and Supprelin LA differ in dosage form (capsule vs. implant), indication of use (weight loss vs. CPP), method of access (OTC vs. prescription), and route of administration (oral vs. subcutaneous). For example, it is unlikely that a prescription would be written for Suppresia-HP. Additionally, direct-to-patient dispensing of Supprelin LA is not likely since it is not a self-administered product and would likely be inserted by a healthcare professional in a physician's office or outpatient clinic type setting. Although there are some orthographic similarities between this name pair, the product differences will minimize the potential to confuse Suppresia-HP with Supprelin LA.

2. "LA" Modifier Concerns

DMETS does not recommend the use of the modifer, LA, in the proposed proprietary name, Supprelin LA. In reviewing the proprietary name, the primary concerns related to the potential for confusion with the use of the modifer, LA. "LA" has been used in the marketplace to mean "long-acting". However, there is no consistent use of this modifier with respect to time interval. The currently approved drug products that use the modifier "LA" differ with respect to dosage form and frequency of administration. For example: Bicillin L-A (injection for intramuscular administration dosed once, once weekly, twice monthly or monthly, depending on the indication of use); Cardizem LA (tablet dosed once daily); Ritalin LA (capsule dosed once daily), Inderal LA (capsule dosed once daily), and Detrol LA (capsule dosed once daily). Moreover, there are no implants that use the modifier "LA" to describe their dosage form or dosing frequency.

Because there are no implants that use modifiers in the name and the dosing regimens vary among them, the use of "LA" may be misleading and confusing to healthcare professionals. The modifier may imply that there is some unique effectiveness with this product. Furthermore, the July 20, 2006 IOM Report titled "Preventing Medication Errors" recommends and urges FDA to standardize abbreviations, acronyms, and terms to the extent possible (i.e., recommendation #4 in the IOM report www.iom.edu/CMS/3809/22526/35939.aspx). Since there is no longer an immediate-release dosage form of Supprelin, "LA" is not necessary because there is nothing to compare this product against. Thus, we do not recommend the use of the modifer "LA" for Supprelin LA and recommend the use of the name Supprelin (without the modifier).

3. Established Name Concerns

The sponsor proposes to use the route of administration (subcutaneous) in the proposed established name. The route of administration is generally not included in the dosage form. DMETS recommends that "subcutaneous" be deleted from the established name so that it states " ● implant". Additionally, we also note that the established name is inconsistently represented in the package insert labeling versus the container label and carton labeling. The package insert states "histrelin acetate" whereas the container labels and carton labeling state " ● implant". DMETS recommends consulting Richard Lostritto, Chair of the CDER Labeling and Nomenclature Committee (LNC) for guidance with respect to the correct presentation of the established name (i.e., presentation of the route of administration and salt). b(4)

III. COMMENTS TO THE SPONSOR:

A. Comments on the Proprietary Name:

DMETS does not recommend the use of the modifer, LA, in the proposed proprietary name, Supprelin LA. In reviewing the proprietary name, the primary concerns related to the potential for confusion with the use of the modifer, LA. "LA" has been used in the marketplace to mean "long-acting". However, there is no consistent use of this modifier with respect to time interval. The currently approved drug products that use the modifier "LA" differ with respect to dosage form and frequency of administration. For example: Bicillin L-A (injection for intramuscular administration dosed once, once weekly, twice monthly or monthly, depending on the indication of use); Cardizem LA (tablet dosed once daily); Ritalin LA (capsule dosed once daily), Inderal LA (capsule dosed once daily), and Detrol LA (capsule dosed once daily). Moreover, there are no implants that use the modifier "LA" to describe their dosage form or dosing frequency.

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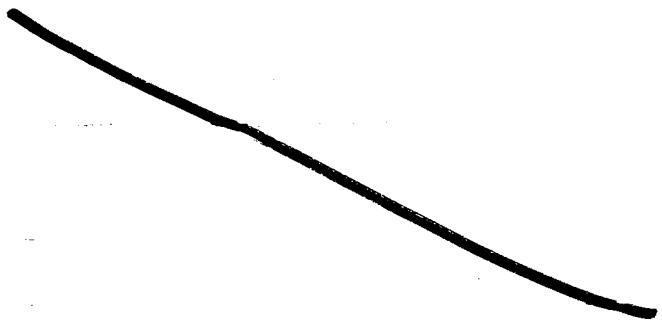
B. Label and Labeling Comments:

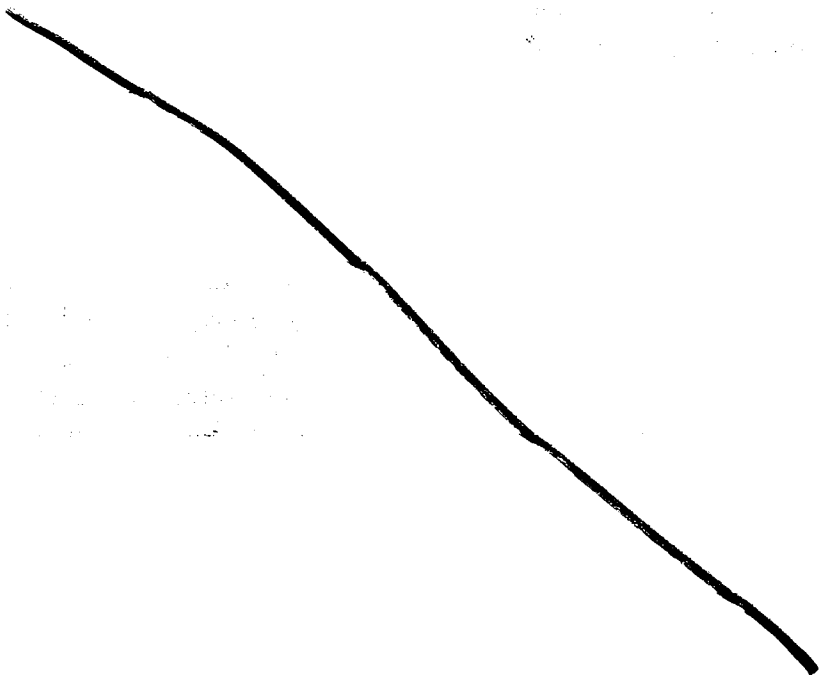
In the review of the insert labeling of Supprelin LA, DMETS has focused on safety issues relating to possible medication errors. DMETS has identified the following areas of improvement, which may minimize potential user error.

1. GENERAL COMMENT

It is not possible to fully assess the safety of the labels and labeling because the information provided doesn't reflect the label and labeling presentations that will actua be used in the market place (i.e., color, placement of name, etc.) Please forward copies o1 the color to be marketed labels and labeling when they are available.



b(4)



3 Page(s) Withheld

_____ Trade Secret / Confidential (b4)

X Draft Labeling (b4)

_____ Draft Labeling (b5)

_____ Deliberative Process (b5)

Withheld Track Number: Proprietary Name Review- 1

Appendix A. Prescription Study Results for Supprelin LA

Requisition A	**Requisition B**	**Verbal**
Suppreclin LA	Supprelin LA	Ciprolan-LA
Supprelin	Supprelin LA	Ciprolin LA
Supprelin	Supprelin LA	Ciprolin LA
Supprelin L.A	Supprelin LA	ciproline LA
Supprelin L.A	Supprelin LA	Ciproline LA
supprelin L.A.	Supprelin LA	Cypralin LA
Supprelin L.A.	Supprelin LA	Cyprilin LA
Supprelin L.A.	SUPPRELIN LA	Cyprolyn LA
Supprelin L.A.	Supprelin LA	Siprolin LA
Supprelin LA	Supprelin LA	Sulfurline LA
Supprelin LA	Supprelin LA	Supprelin LA
Supprelin LA	Supprelin LA	Supprilane LA
Supprelin LA	Supprelin LA	
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	Suprellin LA	

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/s/

Loretta Holmes
1/25/2007 03:28:55 PM
DRUG SAFETY OFFICE REVIEWER

Linda Kim-Jung
1/25/2007 03:53:30 PM
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1/26/2007 04:26:50 PM
DRUG SAFETY OFFICE REVIEWER

Carol Holquist
1/26/2007 04:59:07 PM
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MEMORANDUM	Division of Medication Errors and Technical Support Office of Surveillance and Epidemiology HFD-420; WO22, Mail Stop 4447 Center for Drug Evaluation and Research

To: Mary Parks, MD
Director, Division of Metabolism and Endocrinology Products
HFD-510

Through: Linda Y. Kim-Jung, PharmD, Team Leader
Denise P. Toyer, PharmD, Deputy Director
Carol A. Holquist, RPh, Director
Division of Medication Errors and Technical Support, HFD-420

From: Loretta Holmes, BSN, PharmD, Safety Evaluator
Division of Medication Errors and Technical Support, HFD-420

Date: November 17, 2006

Subject: **DMETS Response to Sponsor Rebuttal and Package Insert Labeling Review**
Drug: Supprelin LA (histrelin acetate) subcutaneous implant, 50 mg
NDA#: 22-058
Sponsor: Valera Pharmaceuticals, Inc.

Review #: 2007-843

This review is written in response to a request from the Division of Metabolism and Endocrinology Products (HFD-510), to reconsider the acceptability of the proprietary name, Supprelin LA, based on the sponsor's submission dated June 30, 2006. The sponsor has requested a reconsideration of the proprietary name, Supprelin LA, for histrelin acetate subcutaneous implant. The sponsor believes that the "LA" modifier is needed since they may revive the Supprelin brand.

In OSE Review 06-0212 (dated January 26, 2007), DMETS did not recommend use of the modifier "LA" because the modifier may be ambigious because there is no consistent use of the modifier with respect to the dosage form or the frequency of administration of a product. Additionally, the modifier was unnecessary because the Supprelin immediate-release product had been discontinued. Furthermore, there are no implants currently on the market that use a modifier to describe their dosage form or frequency of administration.

In addition to the rebuttal submission, the sponsor has submitted revised package insert labeling for DMETS review and comment. The sponsor's comments are presented in bold print.

Sponsor's Comments on the Proposed Proprietary Name

The FDA correctly points out that LA means long acting and that there is no specific time period necessarily associated with the acronym. Another interesting use of LA, not mentioned in the FDA DMETS correspondence, is the brand Sandostatin LAR, i.e. long acting release, which is a *month* long depot injection.

These very atributes of the acronym LA are part of the reason we selected it, since the implant is far longer acting than the originally approved form of Supprelin, which was a daily subcutaneous injection. The reason we feel compelled to use the acronym is that the original, once daily version of Supprelin, is still remembered by a number of Pediatric Endocrinologists. We ascertain this from the hundreds of conversations Valera has had over the years with the pediatric endocrinology community; they associate the name Supprelin with a daily subcutaneous drug. That version of Supprelin never did well in the

market because of the tremendous inconvenience of trying to give a child daily injections and the fact that a competitor, Lupron Depot Ped, introduced a once monthly dosage form.

Our very real concern is that the physician community will see our advertising and direct mail, etc., and confuse it with the old form and therefore ignore our message and fail to ascertain the profound differenc between Supprelin LA and Supprelin.

In addition, Valera feels compelled to differentiate the two names because we are exploring reviving the Supprelin brand for use in a commonly used diagnostic procedure, leutenizing hormone stimulation testing. In this test, potent yet short acting GnRH is desirable. In the past, pediatric endocrinologists used Factrel for this test, but it is no longer on the market, thus they are now forced to use the short acting form of Lupron. Doctors have communicated that Lupron is too slow acting and some of them have urged us to provide histrelin in a daily injection form.

In conclusion, Valera feels strongly that the use of LA in the proprietary name is important to differentiate this *12 month* histrelin implant from the former well-known *daily* histrelin injection. We therefore request the Division allow the use of Supprelin for this product.

DMETS Response:

DMETS acknowledges that the sponsor is concerned that due to name recognition of the original marketed once daily version of Supprelin, there is a need to differentiate that product from the proposed 12 month Supprelin LA implant. However, DMETS' position was that the use of the "LA" modifier was unecessary because Supprelin has been discontinued. Additionally, there is no consistent use of the modifier with respect to dosing interval or dosage form. Furthermore, there are currently no extended-release implants on the market that use modifiers. In this case, the modifier would be ambigious since the once daily version of Supprelin is no longer marketed and the modifier would not help to identify Supprelin LA as being something different from Supprelin injection.

However, the sponsor states in their rebuttal that they may reintroduce the Supprelin brand for use in a common used diagnostic procedure, leutenizing hormone stimulation testing. DMETS acknowledges that if Supprelin is reintroduced to the market there will be a need for some type of modifier to help distinguish the two names since, in that case, the sponsor will concurrently market an immediate-release formulation along with a long-acting implant formulation of the same drug product, both having the same root name. Thus, upon reconsideration of the sponsor's submission, we have reversed our decision not to recommend the use of the modifier "LA".

After reviewing the revised package insert labeling, DMETS acknowledges that the sponsor has addressed most of the package insert recommendations made in OSE Review 06-0212. There is, however, one recommendation that was not followed and DMETS would like to reiterate that recommendation as well as our comment concerning the established name.

1. The sponsor proposes to use the route of administration (subcutaneous) in the proposed established name. The route of administration is generally not included in the established name. DMETS recommends that "subcutaneous" be deleted from the established name so that it states ' [redacted] implant". Additionally, we also note that the established name is inconsistently represented in the package insert labeling versus the container label and carton labeling. The package insert states "histrelin acetate" whereas the container label and carton labeling state ' [redacted] DMETS recommends consulting Richard Lostritto, Chair of the CDER Labeling and Nomenclature Committee (LNC), and Karl Stiller, for guidance with respect to the correct presentation of the established name (i.e., presentation of the route of administration and salt). b(4)

2. In Section 2.4 (Administration/Insertion and Removal Procedure) of the insert labeling, the drawings accompanying the instructions on the administration/insertion and removal procedure appear fuzzy and are not clear enough to show details. DMETS recommends the use of more detailed drawings or the us of actual photographs of the procedure that show clear details of the corresponding steps being describe

In conclusion, DMETS has no objections to the use of the proposed proprietary name, Supprelin LA, for histrelin acetate subcutaneous implant based on the new information about reintroduction of the immediate-release Supprelin. Additionally, we recommend that the sponsor launch an educational campaign informing healthcare practitioners of the differences between the implant and subcutaneous versions of the drug. DMETS recommends implementation of the labeling recommendations as outlined in this review. Additionally, the Division of Drug Marketing, Advertising, and Communications (DDMAC) finds the proposed proprietary name, Supprelin LA, acceptable from a promotional perspective. Please copy DMETS on any correspondence to the sponsor pertaining to this issue. If you have any questions or need clarification, please contact Sammie Beam, Project Manager, at 301-796-0080.

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/s/

Loretta Holmes
5/2/2007 04:25:28 PM
DRUG SAFETY OFFICE REVIEWER

Carol Holquist
5/2/2007 04:45:22 PM
DRUG SAFETY OFFICE REVIEWER