CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

204141Orig1s000

PROPRIETARY NAME REVIEW(S)

Department of Health and Human Services
Public Health Service
Food and Drug Administration
Center for Drug Evaluation and Research
Office of Surveillance and Epidemiology
Office of Medication Error Prevention and Risk Management

Proprietary Name Review

Date:	February 4, 2013
Reviewer:	Carlos M Mena-Grillasca, RPh Division of Medication Error Prevention and Analysis
Team Leader:	Lubna Merchant, MS, PharmD Division of Medication Error Prevention and Analysis
Division Director:	Carol Holquist, RPh Division of Medication Error Prevention and Analysis
Drug Name and Strength:	Topicort (Desoximetasone) Topical Spray, 0.25%
Application Type/Number:	NDA 204141
Applicant/sponsor:	Taro Pharmaceuticals U.S.A. Inc.
OSE RCM #:	2012-2655

*** This document contains proprietary and confidential information that should not be released to the public.***

CONTENTS

1 INTRODUCTION

This review evaluates the proposed proprietary name, Topicort, from a safety and promotional perspective.

1.1 REGULATORY HISTORY

Topicort Topical Spray, 0.25% (NDA 204141) is currently under review. The proposed labels and labeling for Topicort are been evaluated separately under OSE review 2012-2286. In addition, the Topicort (Desoximetasone) product line includes the following products:

NDA Num.	Product	Approval Date
017856	Topicort Cream 0.25%	February 28, 1977
018586	Topicort Gel 0.05%	March 29, 1982
018763	Topicort Ointment 0.25%	October 3, 1983
018309	Topicort LP Cream 0.05%	March 28, 1980

1.2 PRODUCT INFORMATION

The following product information is provided in the November 7, 2012 proprietary name submission.

- Active Ingredient: Desoximetasone
- Indication of Use: Treatment of plaque psoriasis of the body in patients 18 years of age or older. Route of Administration: Topical
- Dosage Form: Spray
- Strength: 0.25%
- Dose and Frequency: Apply a thin film to the affected skin areas twice daily. Rub in gently.
- How Supplied: 6 mL physician sample bottles; 30 mL, 50 mL, and 100 mL
- Storage: 20º-25 ºC (68 º-77 ºF); excursions permitted 15 º-30 ºC (59 º-86 ºF).
- Container and Closure System: White High Density Polyethylene (HDPE) bottles and white (b) (4) screw caps, co-packaged with a white, manual, spray pump with screw type closure.
- Intended Pronunciation: Top-i-cort. The first and second syllable of the name 'Top-i' is pronounced with a short 'o' and short 'i', and the third syllable 'cort' is pronounced with a long 'o'.

2 RESULTS

The following sections provide the information obtained and considered in the overall evaluation of the proposed proprietary name.

2.1 PROMOTIONAL ASSESSMENT OF PROPOSED PROPRIETARY NAME

The Office of Prescription Drug Promotion (OPDP) determined the proposed name is acceptable from a promotional perspective. DMEPA concurred with the findings of OPDP's promotional assessment of the proposed name. Since the proposed proprietary name for this new dosage form is a line extension to the currently marketed Topicort products, feedback was not obtained from the Division of Dermatology and Dental products (DDDP).

2.2 SAFETY ASSESSMENT OF PROPOSED PROPRIETARY NAME

The following aspects of the name were considered in the safety evaluation.

2.2.1 United States Adopted Names (USAN) SEARCH

The January 18, 2013 search of the United States Adopted Name (USAN) stems identified the USAN stem '-cort-', to denote cortisone derivatives, is present in the proposed proprietary name. However, considering that desoximetasone is a synthetic corticosteroid, the USAN stem is consistent with the intended nomenclature. Additionally, the proprietary name Topicort has been marketed for more than 30 years, thus in this circumstance DMEPA will not object to the inclusion of this USAN stem in the already approved name.

2.2.2 Components of the Proposed Proprietary Name

The Applicant indicated in their submission that the proposed name, Topicort, is derived from the prefix "Topi" to express that the product is for topical use and the sufix "cort" from the word corticosteroid, which represents the class of chemicals in which desoximetasone belongs. This proprietary name is comprised of a single word. Although the name contains the prefix "topi" that suggests the topical route of administration, this is the only route of administration intended for the product and it is not misleading and should not contribute to medication error. In addition, the name contains the sufix "cort" that suggests the product is a corticosteroid, which is the class of drug that desoximetasone belongs to, therefore it is not misleading and should not contribute to errors.

2.2.3 Medication Error Data Selection of Cases

We searched the FDA Adverse Event Reporting System (FAERS) database using the strategy listed in Table 1.

Table 1: AERS Search Strategy	
Date	January 15, 2013
Drug Names	Active ingredient: Desoximetasone Product Name: Topicort
MedDRA Search Strategy	Medication Errors (HLGT) Product Packaging Issues HLT Product Label Issues HLT Product Quality Issues (NEC) HLT
Time Limitation	May 22, 2012 (date of last search performed for OSE review 2012-1159, dated June 14, 2012)

The FAERS database search identified 2 cases (8585737v1 and 8673978v1). After individual review, none of the reports were included in the final analysis for the following reasons:

- Adverse event for off-label use and not related to labels and labeling (n=1)
- Wrong strength was dispensed (i.e. prescription was written for Desoximetasone cream 0.05% but product dispense was Desoximetasone cream 0.25%). The case refers to generic Desoximetasone product; hence, it is not relevant to Topicort labels and labeling (n=1)

2.2.4 Multiple Dosage Forms Under a Single Proprietary Name

Topicort is the proprietary name for the Applicant's product line of Desoximetasone products. The Applicant is proposing a new 0.25 % topical spray formulation. The topical spray formulation share the same dose (i.e. thin film to affected areas twice daily) with all the currently marketed Topicort formulations (i.e. cream, ointment, and gel) and have an overlapping strength (i.e. 0.25%) with the cream and ointment formulations. However, all the currently marketed Topicort products are indicated for the relief of the inflammatory and pruritic manifestations of corticosteroid-responsive dermatoses, whereas the spray formulation is proposed for the treatment of plaque psoriasis in adults (which is a narrower indication whithin the corticosteroid-responsive dermatoses).

It is a common and accepted practice to have a product line with multiple dosage forms managed under one proprietary name. We considered the potential risk of off-label use of the new dosage form under the name Topicort for the broader indication of corticosteroid-responsive dermatoses or in the pediatric population. However, there are also risks associated with using dual proprietary names. The use of a new proprietary name for topical spray formulation product poses a risk of concomitant therapy of these medications if practitioners and patients fail to recognize that both products contain desoximetasone leading to overdose. These overdoses could have significant adverse events associated with HPA axis suppresion.

In summary, these findings indicate there may be risk of medication errors in both scenarios, but the risk of harm and likelihood of error may be less than if the product is

marketed as Topicort. Additionally, there are no reports of medication errors associated to the name Topicort. Therefore, given the precedent for using this naming convention, Topicort is an acceptable proprietary name for desoximetasone topical spray.

3 CONCLUSIONS

The proposed proprietary name is acceptable from both a promotional and safety perspective. However, if any of the proposed product characteristics as stated in this review are altered, the name must be resubmitted for review. The proposed proprietary name, Topicort, will be re-reviewed 90 days before approval of the NDA. The conclusions upon re-review are subject to change.

If you have further questions or need clarifications, please contact Janet Anderson, OSE project manager, at 301-796-0675.

4 APPENDIX A – DATABASE DESCRIPTION

FDA Adverse Event Reporting System (FAERS)

The FDA Adverse Event Reporting System (FAERS) is a database that contains information on adverse event and medication error reports submitted to FDA. The database is designed to support the FDA's post-marketing safety surveillance program for drug and therapeutic biologic products. The informatic structure of the database adheres to the international safety reporting guidance issued by the International Conference on Harmonisation. Adverse events and medication errors are coded to terms in the Medical Dictionary for Regulatory Activities (MedDRA) terminology. The suspect products are coded to valid trade names or active ingredients in the FAERS Product Dictionary (FPD).

FDA implemented FAERS on September 10, 2012, and migrated all the data from the previous reporting system (AERS) to FAERS. Differences may exist when comparing case counts in AERS and FAERS. FDA validated and recoded product information as the AERS reports were migrated to FAERS. In addition, FDA implemented new search functionality based on the date FDA initially received the case to more accurately portray the follow up cases that have multiple receive dates.

FAERS data have limitations. First, there is no certainty that the reported event was actually due to the product. FDA does not require that a causal relationship between a product and event be proven, and reports do not always contain enough detail to properly evaluate an event. Further, FDA does not receive reports for every adverse event or medication error that occurs with a product. Many factors can influence whether or not an event will be reported, such as the time a product has been marketed and publicity about an event. Therefore, FAERS data cannot be used to calculate the incidence of an adverse event or medication error in the U.S. population.

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/s/

CARLOS M MENA-GRILLASCA
02/04/2013

LUBNA A MERCHANT
02/04/2013

CAROL A HOLQUIST
02/04/2013

MEMORANDUM

DEPARTMENT OF HEALTH AND HUMAN SERVICES
PUBLIC HEALTH SERVICE
FOOD AND DRUG ADMINISTRATION
CENTER FOR DRUG EVALUATION AND RESEARCH

Type of Meeting: Proprietary Name Review

Meeting Date: October 31, 2012; 9:15 AM
Meeting Location: FDA White Oak, Bldg 22, Room 4440, Teleconference

Application: NDA 204141
Proposed Proprietary Name: (b) (4)
Established Name: Desoximetasone
Applicant: Taro Pharmaceuticals

Meeting Chair: Lubna Merchant, MS, PharmD, Team Leader, DMEPA
Meeting Recorder: Janet Anderson, PharmD, Safety Regulatory Project Manager

FDA Attendees:

Office of Surveillance and Epidemiology
Lubna Merchant, MS, PharmD, Team Leader, DMEPA
Carlos Mena-Grillasca, RPh, Safety Evaluator, DMEPA
Janet Anderson, PharmD, Safety Regulatory Project Manager
Melinda McCord, MD, Medical Officer, DDDP
Gordana Diglisic, MD, Medical Officer TL, DDDP
Tatiana Oussova, MD, MPH, Deputy Director for Safety, DDDP
Paul Phillips, MS, Safety Regulatory Project Manager, DDDP

Applicant Attendees:

Taro Pharmaceuticals U.S.A. Inc.
Bianca Thomae, Esq., Director, Associate Corporate and Senior Patent Counsel
Kavita Srivastava, Executive Director, Regulatory Affairs

Background:

DMEPA requested this teleconference to inform Taro Pharmaceuticals of preliminary concerns identified during the review of the proposed proprietary name, [redacted]

Discussion Summary

This is a courtesy call to notify you of our preliminary findings and safety concerns with regards to your proposed proprietary name [redacted] that was submitted on September 27, 2012.

Our preliminary review has identified that the proposed proprietary name [redacted] is unacceptable from a look-alike and sound-alike perspective for the following reason:

1. The proposed proprietary name [redacted] is orthographically and phonetically similar to the name, [redacted]

   - **Similarity in spelling:** [redacted] that appear in identical positions with [redacted]. In addition, [redacted]

   - **Phonetic similarities:** [redacted] contain [redacted] syllables similar stresses in their names. When spoken, the prefix, infix, and suffix sound similar. This can lead to drug name confusion in verbal communications. This phonetic similarity was confirmed in the FDA prescription studies when the proposed proprietary name, [redacted] was misinterpreted as [redacted] In addition, due to the [redacted] in the proposed name [redacted] all 22 participants in the voice study misinterpreted the name by [redacted] in their interpretations.

   - **Regulation:** 21 CFR 201.10(c)(5), which states "The labeling of a drug may be misleading by reason of designation of a drug or ingredient by a proprietary name that, because of similarity in spelling or pronunciation, may be confused with the proprietary name or the established name of a different drug or ingredient."

2. Our preliminary evaluation of your secondary name [redacted] finds the name unacceptable due to the use of the USAN stem [redacted] Use of these stems in proprietary names, even when used consistently with the USAN meaning, can result in multiple similar proprietary names and proprietary names that are similar to established names, thus increasing the chance of confusion among those drugs. To reduce the potential for confusion, USAN stems should not be incorporated into proprietary names.

Conclusion:
Based on these findings, DMEPA finds the proposed name, [redacted] unacceptable. We wanted to discuss the regulatory options.

Choice #1: Wait until DMEPA completes a full review and issues a formal letter with our decision by the PDUFA goal date of December 27, 2012.
OR
Choice #2: Withdraw the proposed proprietary name [redacted] and submit an alternate name for our evaluation. You may consider using the current name used for your other Desoximetasone formulations (i.e. Topicort) or a new name. If you decide to submit a new name, please take into consideration our preliminary advice regarding the alternate name, [redacted]

We remind you that a new 90-day review cycle is required for each proprietary name request review.

Conclusion

Taro Pharmaceuticals responded that they will [redacted] submit the name Topicort for review.

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/s/

JANET L ANDERSON
11/01/2012