CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

204286Orig1s000

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:	May 6, 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:	Naftin (Naftifine Hydrochloride) Gel, 2%
Application Type/Number:	NDA 204286
Applicant/sponsor:	Merz Pharmaceuticals LLC
OSE RCM #:	2013-459

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

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1 INTRODUCTION

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

1.1 REGULATORY HISTORY

Naftin Gel, 2% (NDA 204286) is currently under review. The proposed labels and labeling for Naftin were evaluated separately under OSE review 2012-2869. In addition, the Naftin (Naftifine Hydrochloride) product line includes the following products:

NDA Num.	Product	Approval Date
019599	Naftin Cream, 1%	June 1, 1998
019356	Naftin Gel, 1%	October 1, 1990
019599	Naftin Cream, 2%	March 1, 2012

1.2 PRODUCT INFORMATION

The following product information is provided in the February 8, 2013 proprietary name submission.

- Active Ingredient: Naftifine Hydrochloride
- Indication of Use: Treatment of interdigital (b) (4) tinea pedis caused by the organisms *Trichophyton rubrum*, *Trichophyton mentagrophytes*, and *Epidermophyton floccosum* in patients (b) (4) years of age and older.
- Route of Administration: Topical
- Dosage Form: Gel
- Strength: 2%
- Dose and Frequency: Apply a thin film to the affected skin areas once daily for 2 weeks.
- How Supplied: 2 gram physician sample tubes; 45 gram tubes
- Storage: 25 ºC (77 ºF); excursions permitted 15 º-30 ºC (59 º-86 ºF).
- Container and Closure System: Aluminum tubes with (b) (4) caps.
- Intended Pronunciation: Naf-tin

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 Naftin 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 March 16, 2013 search of the United States Adopted Name (USAN) stems did not identify that a USAN stem is present in the proposed proprietary name.

2.2.2 Components of the Proposed Proprietary Name

The Applicant indicated in their submission that the proposed name, Naftin, is currently the proprietary name of 3 topical antifungal drugs (Naftin Cream, 1%, 2% and Naftin Gel, 1%) containing naftifine hydrochloride as the active pharmaceutical ingredient. This proprietary name is comprised of a single word that does not contain any components (i.e. a modifier, route of administration, dosage form, etc.) that are misleading or can contribute to medication error.

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	February 22, 2013
Drug Names	Active ingredient: Naftifine and Naftifine Hydrochloride Product Name: Naftin
MedDRA Search Strategy	Medication Errors (HLGT) Product Packaging Issues HLT Product Label Issues HLT Product Quality Issues (NEC) HLT
Time Limitation	None

The FAERS database search identified 1 case (5098547v1). After individual review, the case was not included in the final analysis because the case describes an adverse event not related to a medication error.

2.2.4 Multiple Dosage Forms Under a Single Proprietary Name

Naftin is the proprietary name for the Applicant's product line of Naftifine Hydrochloride products. The Applicant is proposing a new 2 % strength for the gel formulation. The proposed 2% gel formulation and the currently marketed 2% cream formulation share the same dose and frequency (once daily). However, there are differences in indication and dosages among all the Naftin formulations currently marketed and the proposed 2% gel as presented in the following table:

Product	Indication	Dosage
Naftin Cream 1%	Topical treatment of tinea pedis, tinea cruris and tinea corporis caused by the organisms *Trichophyton rubrum*, *Trichophyton mentagrophytes*, and *Epidermophyton floccosum*	Apply a sufficient quantity into the affected areas once a day for 4 weeks
Naftin Cream 2%	Topical treatment of interdigital tinea pedis, tinea cruris and tinea corporis caused by the organism *Trichophyton rubrum* in patients 18 years of age and older	Apply a thin layer once daily to the affected area for 2 weeks
Naftin Gel 1%	Topical treatment of tinea pedis, tinea cruris and tinea corporis caused by the organisms *Trichophyton rubrum*, *Trichophyton mentagrophytes*, *Trichophyton tonsurans, and Epidermophyton floccosum*	Apply a sufficient quantity into the affected areas twice a day for 4 weeks
Naftin Gel 2%	Topical treatment of interdigital (b) (4) tinea pedis caused by the organisms *Trichophyton rubrum*, *Trichophyton mentagrophytes*, *and Epidermophyton floccosum* in patients (b) (4) years of age and older.	Apply a thin layer to the affected area once daily for 2 weeks.

We note that all the currently marketed Naftin products as well as the proposed Naftin Gel 2% have separate Prescribing Information (PI).

It is a common and accepted practice to have a product line with multiple dosage forms and strengths managed under one proprietary name. We considered the potential risk of off-label use of the new 2% gel product under the name Naftin for the broader indication of tinea cruris or tinea corporis. However, there are also risks associated with using dual proprietary names. The use of a new proprietary name for the 2% gel product poses a risk of concomitant therapy of

these medications if practitioners and patients fail to recognize that both products contain naftifine hydrochloride leading to overdose.

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 if the product is marketed as Naftin. Additionally, there are no reports of medication errors associated to the name Naftin. Therefore, given the precedent for using this naming convention, Naftin is an acceptable proprietary name for naftifine hydrochloride 2% gel.

2.2.5 Communication of DMEPA's Analysis at Midpoint of Review

DMEPA communicated our findings to the Division of Dermatology and Dental Products via e-mail on March 20, 2013. At that time we also requested additional information or concerns that could inform our review. Per e-mail correspondence from the Division of Dermatology and Dental Products on March 22, 2013, they stated no additional concerns with the proposed proprietary name, Naftin.

3 CONCLUSIONS

The proposed proprietary name is acceptable from both a promotional and safety perspective.

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

3.1 COMMENTS TO THE APPLICANT

We have completed our review of the proposed proprietary name, Naftin, and have concluded that this name is acceptable.

The proposed proprietary name must be re-reviewed 90 days prior to approval of the NDA. The results are subject to change. If any of the proposed product characteristics as stated in your February 8, 2013 submission are altered, the name must be resubmitted for review.

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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