

**CENTER FOR DRUG EVALUATION AND
RESEARCH**

APPLICATION NUMBER:

206627Orig1s000

PROPRIETARY NAME REVIEW(S)

PROPRIETARY NAME REVIEW

Division of Medication Error Prevention and Analysis (DMEPA)
Office of Medication Error Prevention and Risk Management (OMEPRM)
Office of Surveillance and Epidemiology (OSE)
Center for Drug Evaluation and Research (CDER)

***** This document contains proprietary information that cannot be released to the public*****

Date of This Review: July 02, 2014
Application Type and Number: NDA 206627
Product Name and Strength: Hysingla ER (hydrocodone bitartrate) Extended-release Tablet
20 mg, 30 mg, 40 mg, 60 mg, 80 mg, 100 mg, and 120 mg
Product Type: Single
Rx or OTC: Rx
Applicant/Sponsor Name: Purdue Pharma
Submission Date: April 30, 2014
Panorama #: 2014-17302
DMEPA Primary Reviewer: James Schlick, RPh, MBA
DMEPA Associate Director: Irene Z. Chan, PharmD, BCPS
DMEPA Acting Director: Kellie Taylor, PharmD, MPH

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1 INTRODUCTION

This review evaluates the proposed proprietary name, Hysingla ER, from a safety and promotional perspective. The sources and methods used to evaluate the proposed name are outlined in the reference section and Appendix A respectively. The Applicant submitted an external name study, conducted by (b) (4) for this product.

1.1 REGULATORY HISTORY

The sponsor previously submitted the proposed proprietary name, (b) (4) on October 4, 2013. However, the Division of Medication Error Prevention and Analysis (DMEPA) found the name, (b) (4) unacceptable in OSE Review #2013- 2309, dated March 31, 2014 due to the following proprietary names with orthographic and phonetic similarities and shared product characteristics :

- (b) (4)

Thus, the sponsor submitted the name, Hysingla ER, for review on April 30, 2014.

1.2 PRODUCT INFORMATION

The following product information is provided in the April 30, 2014 proprietary name submission.

- Intended Pronunciation: hye-SING-luh EE-ARR.
- Active Ingredient: Hydrocodone Bitartrate
- Indication of Use: The proposed indication is for the management of moderate to severe pain when a continuous, around-the-clock analgesic is needed for an extended period of time.
- Route of Administration: Oral
- Dosage Form: Controlled-release tablet
- Strength: 20 mg, 30 mg, 40 mg, 60 mg, 80 mg, 100 mg, and 120 mg
- Dose and Frequency: 20 mg to 120 mg once daily
- How Supplied/ Container and Closure Systems: 60 count bottles
- Storage: Room temperature

2 RESULTS

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

2.1 PROMOTIONAL ASSESSMENT

The Office of Prescription Drug Promotion (OPDP) determined the proposed name is acceptable from a promotional perspective. DMEPA and the Division of Analgesia, Anesthesia, and Addiction

products (DAAAP) concurred with the findings of OPDP’s promotional assessment of the proposed name.

2.2 SAFETY ASSESSMENT

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

2.2.1 United States Adopted Names (USAN) Search

There is no USAN stem present in the proprietary name¹.

2.2.2 Components of the Proposed Proprietary Name

The Applicant did not provide a derivation or intended meaning for the proposed name, Hysingla ER, in their submission. This proprietary name is comprised of a single word and the modifier “ER”. The name Hysingla ER does not contain any components (route of administration, dosage form, etc.) in the root name that are misleading or can contribute to medication error.

Within the opioid class there are currently only two approved long acting opioid products, Opana ER and Zohydro ER, which contain the modifier “ER”. Both of these products are taken every 12 hours versus once a day with Hysingla ER. We considered whether the existing Opana ER and Zohydro ER names may lead users to believe that all opioid “ER” products are given twice a day.

Our evaluation of this safety concern revealed no clear and compelling post-marketing cases that involve similar circumstances. We also identified the currently marketed name Xartemis XR and the conditionally acceptable name, (b) (4) ***. (b) (4)

If we address our safety concern with Purdue Pharma and they change the modifier to “XR”, we may create a similar safety concern. Additionally, the modifier “ER” accurately describes the product as a long acting formulation and it distinguishes the long acting formulation from currently marketed immediate release formulations. Lastly, we believe the safety concern can be mitigated through label and labeling interventions to reinforce the proper frequency of administration for Hysingla ER. Therefore, we have no outstanding concerns with the modifier, and we find the proposed modifier acceptable.

2.2.3 FDA Name Simulation Studies

One hundred and one (101) practitioners participated in DMEPA’s prescription studies. The interpretations did not overlap with any currently marketed products nor did the misinterpretations sound or look similar to any currently marketed products or any products in the pipeline.

In the voice prescription, the letter string “Hy” was misinterpreted as “Hi” and “High”. In the written prescriptions, the letter string “Hys” was misinterpreted as “Hyp”. Appendix B contains the results from the verbal and written prescription studies.

2.2.4 Comments from Other Review Disciplines at Initial Review

In response to the OSE, May 27, 2014 e-mail, the Division of Analgesia, Anesthesia, and Addiction Products (DAAAP) forwarded concerns relating to the proprietary name, Singulair, at the initial phase

¹USAN stem search conducted on May 21, 2014.

of the review. DMEPA indicated in an email dated May 29, 2014 that the name Singlair will be evaluated for safety concerns.

2.2.5 *Phonetic and Orthographic Computer Analysis (POCA) Search Results*

Table 1 lists the number of names with the combined orthographic and phonetic score of $\geq 50\%$ retrieved from our POCA search organized as highly similar, moderately similar or low similarity for further evaluation. Table 1 also includes names identified from the ^{(b) (4)} external study.

Table 1. POCA Search Results	Number of Names
Highly similar name pair: combined match percentage score $\geq 70\%$	0
Moderately similar name pair: combined match percentage score $\geq 50\%$ to $\leq 69\%$	43
Low similarity name pair: combined match percentage score $\leq 49\%$	9

2.2.6 *Safety Analysis of Names with Potential Orthographic, Spelling, and Phonetic Similarities*

Our analysis of the 52 names contained in Table 1 determined all 52 names will not pose a risk for confusion as described in Appendices C through G.

2.2.7 *Communication of DMEPA's Analysis at Midpoint of Review*

DMEPA communicated our findings to the Division of Analgesia, Anesthesia, and Addiction Products (DAAAP) via e-mail on June 11, 2014. At that time we also requested additional information or concerns that could inform our review. Per e-mail correspondence from the DAAAP on June 12, 2014, they stated no additional concerns with the proposed proprietary name, Hysingla ER.

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 Vaishali Jarral, OSE project manager, at 301-796-4248.

3.1 COMMENTS TO THE APPLICANT

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

If any of the proposed product characteristics as stated in your April 30, 2014 submission are altered, the name must be resubmitted for review.

4 REFERENCES

1. **USAN Stems** (<http://www.ama-assn.org/ama/pub/physician-resources/medical-science/united-states-adopted-names-council/naming-guidelines/approved-stems.page>)

USAN Stems List contains all the recognized USAN stems.

2. **Phonetic and Orthographic Computer Analysis (POCA)**

POCA is a system that FDA designed. As part of the name similarity assessment, POCA is used to evaluate proposed names via a phonetic and orthographic algorithm. The proposed proprietary name is converted into its phonemic representation before it runs through the phonetic algorithm. Likewise, an orthographic algorithm exists that operates in a similar fashion. POCA is publicly accessible.

3. **Drugs@FDA**

Drugs@FDA is an FDA Web site that contains most of the drug products approved in the United States since 1939. The majority of labels, approval letters, reviews, and other information are available for drug products approved from 1998 to the present. Drugs@FDA contains official information about FDA-approved *brand name* and *generic drugs*; *therapeutic biological products*, *prescription* and *over-the-counter* human drugs; and *discontinued drugs* (see Drugs @ FDA Glossary of Terms, available at http://www.fda.gov/Drugs/InformationOnDrugs/ucm079436.htm#ther_biological).

4. **RxNorm**

RxNorm contains the names of prescription and many OTC drugs available in the United States. RxNorm includes generic and branded:

- Clinical drugs – pharmaceutical products given to (or taken by) a patient with therapeutic or diagnostic intent
- Drug packs – packs that contain multiple drugs, or drugs designed to be administered in a specified sequence

Radiopharmaceuticals, contrast media, food, dietary supplements, and medical devices, such as bandages and crutches, are all out of scope for RxNorm

(<http://www.nlm.nih.gov/research/umls/rxnorm/overview.html#>).

5. **Division of Medication Errors Prevention and Analysis proprietary name consultation requests**

This is a list of proposed and pending names that is generated by the Division of Medication Error Prevention and Analysis from the Access database/tracking system.

APPENDICES

Appendix A

FDA's Proprietary Name Risk Assessment considers the promotional and safety aspects of a proposed proprietary name.

1. **Promotional Assessment:** For prescription drug products, the promotional review of the proposed name is conducted by OPDP. For over-the-counter (OTC) drug products, the promotional review of the proposed name is conducted by DNCE. OPDP or DNCE evaluates proposed proprietary names to determine if they are overly fanciful, so as to misleadingly imply unique effectiveness or composition, as well as to assess whether they contribute to overstatement of product efficacy, minimization of risk, broadening of product indications, or making of unsubstantiated superiority claims. OPDP or DNCE provides their opinion to DMEPA for consideration in the overall acceptability of the proposed proprietary name.
2. **Safety Assessment:** The safety assessment is conducted by DMEPA, and includes the following:
 - a. **Preliminary Assessment:** We consider inclusion of USAN stems or other characteristics that when incorporated into a proprietary name may cause or contribute to medication errors (i.e., dosing interval, dosage form/route of administration, medical or product name abbreviations, names that include or suggest the composition of the drug product, etc.) See prescreening checklist below in Table 2*. DMEPA defines a medication error as any preventable event that may cause or lead to inappropriate medication use or patient harm while the medication is in the control of the health care professional, patient, or consumer.²

***Table 2- Prescreening Checklist for Proposed Proprietary Name**

	Affirmative answers to these questions indicate a potential area of concern.
Y/N	Does the name have obvious Similarities in Spelling and Pronunciation to other Names?
Y/N	Are there Manufacturing Characteristics in the Proprietary Name?
Y/N	Are there Medical and/or Coined Abbreviations in the Proprietary Name?
Y/N	Are there Inert or Inactive Ingredients referenced in the Proprietary Name?
Y/N	Does the Proprietary Name include combinations of Active Ingredients
Y/N	Is there a United States Adopted Name (USAN) Stem in the Proprietary Name?
Y/N	Is this the same Proprietary Name for Products containing Different Active Ingredients?
Y/N	Is this a Proprietary Name of a discontinued product?

- b. **Phonetic and Orthographic Computer Analysis (POCA):** Following the preliminary screening of the proposed proprietary name, DMEPA staff evaluates the proposed name against potentially similar names. In order to identify names with potential similarity to the proposed

² National Coordinating Council for Medication Error Reporting and Prevention.

<http://www.nccmerp.org/about/MedErrors.html>. Last accessed 10/11/2007.

proprietary name, DMEPA enters the proposed proprietary name in POCA and queries the name against the following drug reference databases, Drugs@fda, CernerRxNorm, and names in the review pipeline using a 50% threshold in POCA. DMEPA reviews the combined orthographic and phonetic matches and group the names into one of the following three categories:

- Highly similar pair: combined match percentage score $\geq 70\%$.
- Moderately similar pair: combined match percentage score $\geq 50\%$ to $\leq 69\%$.
- Low similarity: combined match percentage score $\leq 49\%$.

Using the criteria outlined in the check list (Table 3-5) that corresponds to each of the three categories (highly similar pair, moderately similar pair, and low similarity), DMEPA evaluates the name pairs to determine the acceptability or non-acceptability of a proposed proprietary name. Based on our root cause analysis of post marketing experience errors, we find the expression of strength and dose, which is often located in close proximity to the drug name itself on prescriptions and medication orders, is an important factor in mitigating or potentiating confusion between similarly named drug pairs. The ability of other product characteristics to mitigate confusion is limited (e.g., route, frequency, dosage form, etc.).

- For highly similar names, there is little that can mitigate a medication error, including product differences such as strength and dose. Thus, proposed proprietary names that have a combined score of ≥ 70 percent are likely to be rejected by FDA. (See Table 3)
- Moderately similar names with overlapping or similar strengths or doses represent an area for concern for FDA. The dosage and strength information is often located in close proximity to the drug name itself on prescriptions and medication orders, can be an important factor that either increases or decreases the potential for confusion between similarly named drug pairs. The ability of other product characteristics (e.g., route, frequency, dosage form, etc.) to mitigate confusion may be limited when the strength or dose overlaps. FDA will review these names further, to determine whether sufficient differences exist to prevent confusion. (See Table 4)
- Names with low similarity that have no overlap or similarity in strength and dose are generally acceptable unless there are data to suggest that the name might be vulnerable to confusion (e.g., prescription simulation study suggests that the name is likely to be misinterpreted as a marketed product). In these instances, we would reassign a low similarity name to the moderate similarity category and review according to the moderately similar name pair checklist (See Table 5).

- c. FDA Prescription Simulation Studies: DMEPA staff also conducts a prescription simulation studies using FDA health care professionals.

Three separate studies are conducted within the Centers of the FDA for the proposed proprietary name to determine the degree of confusion of the proposed proprietary name 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. The studies employ healthcare professionals (pharmacists, physicians, and nurses), and attempts to simulate the prescription

ordering process. The primary Safety Evaluator uses the results to identify orthographic or phonetic vulnerability of the proposed name to be misinterpreted by healthcare practitioners.

In order to evaluate the potential for misinterpretation of the proposed proprietary name in handwriting and verbal communication of the name, inpatient medication orders and/or outpatient prescriptions are written, each consisting of a combination of marketed and unapproved drug products, including the proposed name. These orders are optically scanned and one prescription is delivered to a random sample of participating health professionals via e-mail. In addition, a verbal prescription is recorded on voice mail. The voice mail messages are then sent to a random sample of the participating health professionals for their interpretations and review. After receiving either the written or verbal prescription orders, the participants record their interpretations of the orders which are recorded electronically.

- d. Comments from Other Review Disciplines: DMEPA requests the Office of New Drugs (OND) and/or Office of Generic Drugs (OGD), ONDQA or OBP for their comments or concerns with the proposed proprietary name, ask for any clinical issues that may impact the DMEPA review during the initial phase of the name review. Additionally, when applicable, at the same time DMEPA requests concurrence/non-concurrence with OPDP’s decision on the name. The primary Safety Evaluator addresses any comments or concerns in the safety evaluator’s assessment.

The OND/OGD Regulatory Division is contacted a second time following our analysis of the proposed proprietary name. At this point, DMEPA conveys their decision to accept or reject the name. The OND or OGD Regulatory Division is requested to provide any further information that might inform DMEPA’s final decision on the proposed name.

Additionally, other review disciplines opinions such as ONDQA or OBP may be considered depending on the proposed proprietary name.

When provided, DMEPA considers external proprietary name studies conducted by or for the Applicant/Sponsor and incorporates the findings of these studies into the overall risk assessment.

The DMEPA primary reviewer assigned to evaluate the proposed proprietary name is responsible for considering the collective findings, and provides an overall risk assessment of the proposed proprietary name.

Table 3. Highly Similar Name Pair Checklist (i.e., combined Orthographic and Phonetic score is $\geq 70\%$).

Answer the questions in the checklist below. Affirmative answers to these questions suggest that the pattern of orthographic or phonetic differences in the names may render the names less likely to confusion, provided that the pair do not share a common strength or dose (see Step 1 of the Moderately Similar Checklist).	
<u>Orthographic Checklist</u>	<u>Phonetic Checklist</u>

Y/N	Do the names begin with different first letters? <i>Note that even when names begin with different first letters, certain letters may be confused with each other when scripted.</i>	Y/N	Do the names have different number of syllables?
Y/N	Are the lengths of the names dissimilar* when scripted? <i>*FDA considers the length of names different if the names differ by two or more letters.</i>	Y/N	Do the names have different syllabic stresses?
Y/N	Considering variations in scripting of some letters (such as <i>z</i> and <i>f</i>), is there a different number or placement of upstroke/downstroke letters present in the names?	Y/N	Do the syllables have different phonologic processes, such vowel reduction, assimilation, or deletion?
Y/N	Is there different number or placement of cross-stroke or dotted letters present in the names?	Y/N	Across a range of dialects, are the names consistently pronounced differently?
Y/N	Do the infixes of the name appear dissimilar when scripted?		
Y/N	Do the suffixes of the names appear dissimilar when scripted?		

Table 4: Moderately Similar Name Pair Checklist (i.e., combined score is $\geq 50\%$ to $\leq 69\%$).

Step 1	Review the DOSAGE AND ADMINISTRATION and HOW SUPPLIED/STORAGE AND HANDLING sections of the prescribing information (or for OTC drugs refer to the Drug Facts label) to determine if strengths and doses of the name pair overlap or are very similar. Different strengths and doses for products whose names are moderately similar may decrease the risk of confusion between the moderately similar name pairs. Name pairs that have overlapping or similar strengths have a higher potential for confusion and should be evaluated further (see Step 2).
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	<p>For single strength products, also consider circumstances where the strength may not be expressed.</p> <p>For any combination drug products, consider whether the strength or dose may be expressed using only one of the components.</p> <p>To determine whether the strengths or doses are similar to your proposed product, consider the following list of factors that may increase confusion:</p> <ul style="list-style-type: none">○ Alternative expressions of dose: 5 mL may be listed in the prescribing information, but the dose may be expressed in metric weight (e.g., 500 mg) or in non-metric units (e.g., 1 tsp, 1 tablet/capsule). Similarly, a strength or dose of 1000 mg may be expressed, in practice, as 1 g, or vice versa.○ Trailing or deleting zeros: 10 mg is similar in appearance to 100 mg which may potentiate confusion between a name pair with moderate similarity.○ Similar sounding doses: 15 mg is similar in sound to 50 mg
Step 2	<p>Answer the questions in the checklist below. Affirmative answers to these questions suggest that the pattern of orthographic or phonetic differences in the names may render the names less likely to confusion between moderately similar names <u>with</u> overlapping or similar strengths or doses.</p>

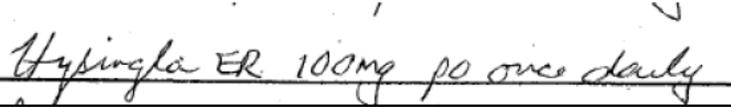
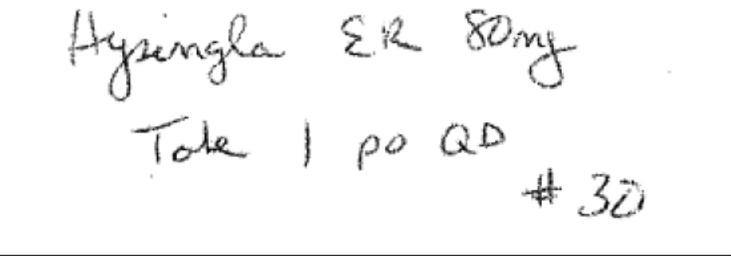
<p>Orthographic Checklist (Y/N to each question)</p> <ul style="list-style-type: none"> • Do the names begin with different first letters? <p>Note that even when names begin with different first letters, certain letters may be confused with each other when scripted.</p> <ul style="list-style-type: none"> • Are the lengths of the names dissimilar* when scripted? <p>*FDA considers the length of names different if the names differ by two or more letters.</p> <ul style="list-style-type: none"> • Considering variations in scripting of some letters (such as <i>z</i> and <i>f</i>), is there a different number or placement of upstroke/downstroke letters present in the names? • Is there different number or placement of cross-stroke or dotted letters present in the names? • Do the infixes of the name appear dissimilar when scripted? • Do the suffixes of the names appear dissimilar when scripted? 	<p>Phonetic Checklist (Y/N to each question)</p> <ul style="list-style-type: none"> • Do the names have different number of syllables? • Do the names have different syllabic stresses? • Do the syllables have different phonologic processes, such as vowel reduction, assimilation, or deletion? • Across a range of dialects, are the names consistently pronounced differently?
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Table 5: Low Similarity Name Pair Checklist (i.e., combined score is $\leq 49\%$).

In most circumstances, these names are viewed as sufficiently different to minimize confusion. Exceptions to this would occur in circumstances where there are data that suggest a name with low similarity might be vulnerable to confusion with your proposed name (for example, misinterpretation of the proposed name as a marketed product in a prescription simulation study). In such instances, FDA would reassign a low similarity name to the moderate similarity category and review according to the moderately similar name pair checklist.

Appendix B: Prescription Simulation Samples and Results

Figure 1. Hysingla ER Study (Conducted on May 16, 2014)

Handwritten Requisition Medication Order	Verbal Prescription
<p><u>Medication Order:</u></p> 	<p>Hysingla ER Strength 80 mg Take 1 by mouth once daily</p>
<p><u>Outpatient Prescription:</u></p> 	<p>Disp # 30</p>

FDA Prescription Simulation Responses (Aggregate 1 Rx Studies Report)

268 People Received Study 101 People Responded				
Study Name: Hysingla ER				
Total	35	34	32	101
INTERPRETATION	OUTPATIENT	VOICE	INPATIENT	TOTAL
HIGHSINGLOT ER	0	1	0	1
HISINGLA	0	1	0	1
HISINGLA ER	0	2	0	2
HI-SINGLA ER TABLETS	0	1	0	1
HISINGLAR ER	0	1	0	1
HYCINGLA ER	0	3	0	3
HYCINGLAT ER	0	1	0	1
HYCINGLEA ER	0	1	0	1
HYPINGLA ER	0	0	2	2
HYPRINGLA ER	0	0	1	1
HYSINGLA ER	34	18	27	79
HYSINGLAT ER	0	3	0	3
HYSINGLE ER	1	0	0	1
HYSINGLET ER	0	2	0	2
HYSINLGA ER	0	0	1	1
UZSINGLA ER	0	0	1	1

Appendix C: Highly Similar Names (i.e., combined POCA score is $\geq 70\%$)

POCA search did not yield any highly similar names.

Appendix D: Moderately Similar Names (i.e., combined POCA score is $\geq 50\%$ to $\leq 69\%$) with no overlap or numerical similarity in Strength and/or Dose

No.	Proposed Name	POCA Score (%)
1.	Hylira	60
2.	Hyosyne	54
3.	HY-PHEN	52
4.	Hysone	52
5.	VYFEMLA	52
6.	Hytussin	51
7.	Histalet	50
8.	Hyphen-HD	50
9.	Hyskon	50
10.	SINGULAIR	50
11.	VISINE-A	50

Appendix E: Moderately Similar Names (i.e., combined POCA score is $\geq 50\%$ to $\leq 69\%$) with overlap or numerical similarity in Strength and/or Dose

No.	Proposed name: Hysingla ER (Hydrocodone) Extended-release Tablets Strengths: 20 mg, 30mg, 40 mg, 60 mg, 80 mg, 100 mg, 120 mg Usual Dose: 1 tablet orally once daily	POCA Score (%)	Prevention of Failure Mode In the conditions outlined below, the following combination of factors, are expected to minimize the risk of confusion between these two names
1.	(b) (4) ***	68	The infix of this name pair has sufficient orthographic differences. The second syllable of this name pair sounds different. (b) (4) *** contains an extra syllable.
2.	Hizentra	59	The prefix and infix of this name pair have sufficient orthographic differences. The third syllable of this name pair sounds different.
3.	Hismanal	58	The prefix and infix of this name pair have sufficient orthographic differences. The second and third syllables of this name pair sound different.
4.	Singlet	58	The prefix and suffix of this name pair have sufficient orthographic differences. The first syllable of this name pair sounds different. Hysingla*** contains an extra syllable.
5.	(b) (4) ***	56	The prefix of this name pair has sufficient orthographic differences. The first and second syllables of this name pair sounds different.

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No.	Proposed name: Hysingla ER (Hydrocodone) Extended-release Tablets Strengths: 20 mg, 30mg, 40 mg, 60 mg, 80 mg, 100 mg, 120 mg Usual Dose: 1 tablet orally once daily	POCA Score (%)	Prevention of Failure Mode In the conditions outlined below, the following combination of factors, are expected to minimize the risk of confusion between these two names
6.	Humibid L.A.	55	<p>The infix and suffix of this name pair have sufficient orthographic differences.</p> <p>The first, second, and third syllables of this name pair sound different. Additionally, if the modifier is spoken, that also offers phonetic difference between the name pair.</p>
7.	Humigen LA	55	<p>The infix and suffix of this name pair have sufficient orthographic differences.</p> <p>The first, second, and third syllables of this name pair sound different. Additionally, if the modifier is spoken, that also offers phonetic difference between the name pair.</p>
8.	HEPSERA	54	<p>The infix and suffix of this name pair have sufficient orthographic differences.</p> <p>The first and second syllables of this name pair sound different.</p>
9.	Histafed LA	54	<p>The prefix, infix, and suffix of this name pair have sufficient orthographic differences.</p> <p>The first, second, and third syllables of this name pair sound different.</p>
10.	Hytinic	54	<p>The infix and suffix of this name pair have sufficient orthographic differences.</p> <p>The second and third syllables of this name pair sound different.</p>
11.	HYSERPIN	53	<p>The suffix of this name pair has sufficient orthographic differences.</p> <p>The second and third syllables of this name pair sound different.</p>

No.	Proposed name: Hysingla ER (Hydrocodone) Extended-release Tablets Strengths: 20 mg, 30mg, 40 mg, 60 mg, 80 mg, 100 mg, 120 mg Usual Dose: 1 tablet orally once daily	POCA Score (%)	Prevention of Failure Mode In the conditions outlined below, the following combination of factors, are expected to minimize the risk of confusion between these two names
12.	Humavent LA	51	<p>The infix and suffix of this name pair have sufficient orthographic differences.</p> <p>The first, second, and third syllables of this name pair sound different. Additionally, if the modifier is spoken, that also offers phonetic difference between the name pair.</p>
13.	HYTRIN	51	<p>Hysingla contains 8 letters where Hytrin contains 6 letters. Thus, Hysingla looks longer when scripted. The letter string ‘singla’ does not look similar to the letter string ‘trin’.</p> <p>The second syllables of this name pair sound different. Hysingla^{***} contains an extra syllable.</p>
14.	KHEDEZLA	50	<p>The prefix and infix of this name pair have sufficient orthographic differences.</p> <p>The first and second syllables of this name pair sound different.</p>
15.	TAFINLAR	50	<p>The prefix and infix of this name pair have sufficient orthographic differences.</p> <p>The first and second syllables of this name pair sound different.</p>

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Appendix F: Low Similarity Names (i.e., combined POCA score is $\leq 49\%$)

No.	Name	POCA Score (%)
1.	Dyazide	Less than 40
2.	Hyalgan	42
3.	Hycodan	43
4.	Hydrocodone	Less than 40
5.	Hygroton	Less than 40
6.	Hyoscyamine	Less than 40
7.	Hyzaar	40
8.	Lyrica	Less than 40
9.	Lysteda	Less than 40

Appendix G: Names not likely to be confused or not used in usual practice settings for the reasons described.

No.	Name	POCA Score (%)	Failure preventions
1.	Histenol	61	Could not find information in DMEPA databases
2.	Q Hist LA	59	Could not find information in DMEPA databases
3.	Ephensin-LA	57	Could not find information in DMEPA databases
4.	(b) (4) ***	56	Could not find information in DMEPA databases
5.	Rheumacin LA	54	Could not find information in DMEPA databases
6.	(b) (4) ***	52	Secondary name submitted to NDA 200179. The name Staxyn was approved on June 17, 2010 under NDA 200179
7.	(b) (4) ***	52	Could not find information in DMEPA databases
8.	HYLAN G-F 20	52	Could not find information in DMEPA databases
9.	Hycolin	51	Could not find information in DMEPA databases

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No.	Name	POCA Score (%)	Failure preventions
10.	De-Sone LA	50	Could not find information in DMEPA databases
11.	(b) (4) ***	50	Secondary name submitted under NDA (b) (4). The name (b) (4) was approved on (b) (4) under NDA (b) (4)
12.	(b) (4) ***	50	Could not find information in DMEPA databases
13.	Histine D	50	Could not find information in DMEPA databases
14.	Histine-B	50	Could not find information in DMEPA databases
15.	HybriSil	50	Could not find information in DMEPA databases
16.	Hycoclear	50	Could not find information in DMEPA databases
17.	(b) (4) ***	50	Name submitted under ANDA (b) (4). The name (b) (4) was approved on (b) (4) under ANDA (b) (4)

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/s/

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