CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

205831Orig1s000

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)

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Date of This Review:	November 24, 2014
Application Type and Number:	NDA 205831
Product Name and Strength:	Aptensio XR (Methylphenidate Hydrochloride) Extended Release Capsules 10 mg, 15 mg, 20 mg, 30 mg, 40 mg, 50 mg, 60 mg (b) (4) (b) (4)
Product Type:	Single Ingredient Product
Rx or OTC:	Rx
Applicant/Sponsor Name:	Rhodes Pharmaceuticals L.P.
Submission Date:	September 5, 2014
Panorama #:	2014-26342
DMEPA Primary Reviewer:	Loretta Holmes, BSN, PharmD
DMEPA Associate Director:	Irene Z. Chan, PharmD, BCPS

Contents

1 INTRODUCTION

This review evaluates the proposed proprietary name, Aptensio XR, from a safety and misbranding 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 Division of Medication Error Prevention and Analysis (DMEPA) reviewed this name in a previous review[1] and found the name acceptable.

1.2 PRODUCT INFORMATION

The following product information is provided in the September 5, 2014 proprietary name submission.

- Intended Pronunciation: app-ten-see-ō
- Active Ingredient: Methylphenidate Hydrochloride
- Indication of Use: Treatment of Attention Deficit Hyperactivity Disorder (ADHD) in patients 6 years and older
- Route of Administration: Oral
- Dosage Form: Extended Release Capsules
- Strengths: 10 mg, 15 mg, 20 mg, 30 mg, 40 mg, 50 mg, 60 mg (b) (4)
- Dose and Frequency: 10 mg to (b) (4) mg once daily in the morning
- How Supplied: 90-count bottles
- Storage: Store at 20° to 25°C (68° to 77°F)
- Container and Closure Systems: HDPE bottles (b) (4)

2 RESULTS

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

[1] Holmes L. Proprietary Name Review for Aptensio XR (IND 104624). Silver Spring (MD): Food and Drug Administration, Center for Drug Evaluation and Research, Office of Surveillance and Epidemiology, Division of Medication Error Prevention and Analysis (US); 2013 Aug 01. 27 p. OSE RCM No.: 2013-434.

2.1 MISBRANDING ASSESSMENT

The Office of Prescription Drug Promotion (OPDP) determined that the proposed name would not misbrand the proposed product. DMEPA and the Division of Psychiatry Products (DPP) concurred with the findings of OPDP's 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 name[2].

2.2.2 Components of the Proposed Proprietary Name

The Applicant indicated in their submission that the proposed name, Aptensio XR, is derived from a blank canvas. This proprietary name is comprised of a root name (Aptensio) and a modifier (XR).

The proposed modifier, XR, was previously evaluated for this product and found acceptable in a previous name review[3]. Thus, it will not be evaluated further in this review.

2.2.3 FDA Name Simulation Studies

One hundred nine practitioners participated in DMEPA's prescription studies. The responses did not overlap with any currently marketed products nor did the responses sound or look similar to any currently marketed products or any products in the pipeline. In the verbal study, five participants misinterpreted the beginning letter "A" as the letter "E"; twelve participants misinterpreted the letter "p" as the letter "b"; and five participants misinterpreted the letter "s" as the letter "c". 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, September 16, 2014 e-mail, the Division of Psychiatry Products (DPP) did not forward any comments or concerns relating to the proposed proprietary name at the initial phase of the review.

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 ≥50% retrieved from our POCA search[4] organized as highly similar, moderately similar

[2]USAN stem search conducted on November 3, 2014.

[3] Winiarski A. Proprietary Name Review for Biphentin (IND 104624). Silver Spring (MD): Food and Drug Administration, Center for Drug Evaluation and Research, Office of Surveillance and Epidemiology, Division of Medication Error Prevention and Analysis (US); 2012 Feb 28. 30 p. OSE RCM No.: 2011-3369.

[4] POCA search conducted on November 3, 2014.

or low similarity for further evaluation. Table 1 also includes names identified from the [redacted] (b) (4) external name study.

Table 1. POCA Search Results	Number of Names
Highly similar name pair: combined match percentage score ≥70%	2
Moderately similar name pair: combined match percentage score ≥50% to ≤ 69%	78
Low similarity name pair: combined match percentage score ≤49%	2

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

Our analysis of the 82 names contained in Table 1 determined all 82 names will not pose a risk for confusion as described in Appendices C through H.

2.2.7 Communication of DMEPA's Analysis at Midpoint of Review

DMEPA communicated our findings to the Division of Psychiatry Products (DPP) via e-mail on November 18, 2014. At that time we also requested additional information or concerns that could inform our review. Per e-mail correspondence from DPP on November 21, 2014, they stated no additional concerns with the proposed proprietary name, Aptensio XR.

3 CONCLUSIONS

The proposed proprietary name is acceptable.

If you have further questions or need clarifications, please contact Vasantha Ayalasomayajula, OSE Project Manager, at 240-402-5035.

3.1 COMMENTS TO THE APPLICANT

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

If any of the proposed product characteristics as stated in your September 5, 2014 submission are altered prior to approval of the marketing application, 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.

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).

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#).

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 evaluates proposed proprietary names for misbranding and safety concerns.

1. **Misbranding Assessment**: For prescription drug products, OPDP assesses the name for misbranding concerns. . For over-the-counter (OTC) drug products, the misbranding assessment of the proposed name is conducted by DNCE. OPDP or DNCE evaluates proposed proprietary names to determine if the name is false or misleading, such as by making misrepresentations with respect to safety or efficacy. For example, a fanciful proprietary name may misbrand a product by suggesting that it has some unique effectiveness or composition when it does not (21 CFR 201.10(c)(3)). 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. [5]

[5] National Coordinating Council for Medication Error Reporting and Prevention. http://www nccmerp.org/aboutMedErrors html. Last accessed 10/11/2007.

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

	Answer the questions in the checklist below. Affirmative answers to any of these questions indicate a potential area of concern that should be carefully evaluated as described in this guidance.
Y/N	**Is the proposed name obviously similar in spelling and pronunciation to other names?**
	Proprietary names should not be similar in spelling or pronunciation to proprietary names, established names, or ingredients of other products.
Y/N	**Are there medical and/or coined abbreviations in the proprietary name?**
	Proprietary names should not incorporate medical abbreviations (e.g., QD, BID, or others commonly used for prescription communication) or coined abbreviations that have no established meaning.
Y/N	**Are there inert or inactive ingredients referenced in the proprietary name?**
	Proprietary names should not incorporate any reference to an inert or inactive ingredient in a way that might create an impression that the ingredient's value is greater than its true functional role in the formulation (21 CFR 201.10(c)(4).
Y/N	**Does the proprietary name include combinations of active ingredients?**
	Proprietary names of fixed combination drug products should not include or suggest the name of one or more, but not all, of its active ingredients (see 21 CFR 201.6(b).
Y/N	**Is there a United States Adopted Name (USAN) stem in the proprietary name?**
	Proprietary names should not incorporate a USAN stem in the position that USAN designates for the stem.
Y/N	**Is this proprietary name used for another product that does not share at least one common active ingredient?**
	Drug products that do not contain at least one common active ingredient should not use the same (root) proprietary name.
Y/N	**Is this a proprietary name of a discontinued product?**
	Proprietary names should not use the proprietary name of a discontinued product if that discontinued drug product does not contain the same active ingredients.

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 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 ≥70%.
- Moderately similar pair: combined match percentage score ≥50% to ≤ 69%.
- Low similarity: combined match percentage score ≤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. The intent of these checklists is to increase the transparency and predictability of the safety determination of whether a proposed name is vulnerable to confusion from a look-alike or sound-alike perspective. Each bullet below corresponds to the name similarity category cross-references the respective table that addresses criteria that DMEPA uses to determine whether a name presents a safety concern from a look-alike or sound-alike perspective.

- For highly similar names, differences in product characteristics often cannot mitigate the risk of a medication error, including product differences such as strength and dose. Thus, proposed proprietary names that have a combined score of ≥ 70 percent are at risk for a look-alike sound-alike confusion which is an area of concern (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, and it 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 to mitigate confusion (e.g., route, frequency, dosage form, etc.) may be limited when the strength or dose overlaps. We review such 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 (See Table 5) 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.

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 ≥ 70%).

Answer the questions in the checklist below. Affirmative answers to some of 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.			
Orthographic Checklist		Phonetic Checklist	
Y/N	Do the names begin with different first letters? *Note that even when names begin with different first letters, certain letters may be confused with each other when scripted.*	**Y/N**	Do the names have different number of syllables?
Y/N	Are the lengths of the names dissimilar* when scripted? **FDA considers the length of names different if the names differ by two or more letters.*	**Y/N**	Do the names have different syllabic stresses?
Y/N	Considering variations in scripting of some letters (such as *z* and *f*), 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 ≥50% to ≤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 or doses have a higher potential for confusion and should be evaluated further (see Step 2). Because the strength or dose could be used to express an order or prescription for a particular drug product, overlap in one or both of these components would be reason for further evaluation. For single strength products, also consider circumstances where the strength may not be expressed. For any i.e. drug products comprised of more than one active ingredient, consider whether the strength or dose may be expressed using only one of the components. To determine whether the strengths or doses are similar to your proposed product, consider the following list of factors that may increase confusion: o 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. o Trailing or deleting zeros: 10 mg is similar in appearance to 100 mg which may potentiate confusion between a name pair with moderate similarity. o Similar sounding doses: 15 mg is similar in sound to 50 mg
Step 2	Answer the questions in the checklist below. Affirmative answers to some of these questions suggest that the pattern of orthographic or phonetic differences in the names may reduce the likelihood of confusion for moderately similar names **with** overlapping or similar strengths or doses.

	Orthographic Checklist (Y/N to each question) • Do the names begin with different first letters? Note that even when names begin with different first letters, certain letters may be confused with each other when scripted. • Are the lengths of the names dissimilar* when scripted? *FDA considers the length of names different if the names differ by two or more letters. • Considering variations in scripting of some letters (such as *z* and *f*), 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?	Phonetic Checklist (Y/N to each question) • Do the names have different number of syllables? • Do the names have different syllabic stresses? • Do the syllables have different phonologic processes, such vowel reduction, assimilation, or deletion? • Across a range of dialects, are the names consistently pronounced differently?

Table 5: Low Similarity Name Pair Checklist (i.e., combined score is ≤49%).

In most circumstances, these names are viewed as sufficiently different to minimize confusion. Exceptions to this would occur in circumstances where, for example, there are data that suggest a name with low similarity is nonetheless misinterpreted as a marketed product name 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. Aptensio XR Study (Conducted on September 19, 2014)

Handwritten Requisition Medication Order	Verbal Prescription
Medication Order: Aptensio XR 60mg po qam	Aptensio XR 10 mg Take one capsule by mouth every morning Dispense #30
Outpatient Prescription: Aptensio XR 10mg 1 cap qam Disp. #30	

FDA Prescription Simulation Responses (Aggregate 1 Rx Studies Report)

	259 People Received Study 109 People Responded

Study Name: Aptensio XR

Total	37	30	42	
INTERPRETATION	**OUTPATIENT**	**VOICE**	**INPATIENT**	**TOTAL**
ABTENCIO XR	0	1	0	1
ABTENSEO XR	0	1	0	1
ABTENSIO	0	1	0	1
ABTENSIO XR	0	9	0	9
ALTENSIO XR	0	1	0	1
AP?NSIO XR	1	0	0	1
APENSIO XR	0	0	1	1
APENTISO	1	0	0	1
APHENSIO	1	0	0	1
APHNSIO XR	1	0	0	1
APTENKIS XR	0	0	1	1

APTENSIA XR	0	0	1	1
APTENSIAR XR	0	1	0	1
APTENSIO	1	0	1	2
APTENSIO SR	0	1	0	1
APTENSIO XR	23	7	26	56
APTENSIO XR `	1	0	0	1
APTENSIOXR	0	0	1	1
APTENSIS XR	0	0	5	5
APTHNSIO	1	0	0	1
APTINITIS XR	0	0	1	1
APTINSIO	1	0	0	1
APTINSIO XR	3	0	2	5
APUNSIO XR	1	0	0	1
APXENSIO XR	1	0	0	1
APXINSIA XR	1	0	0	1
ATENCIO XR	0	3	0	3
EPHTENSIO XR	0	1	0	1
EPTENCIO XR	0	1	0	1
EPTENSIO XR	0	3	0	3
OPTENSIO XR	0	0	3	3

Appendix C: Highly Similar Names (e.g., combined POCA score is ≥70%)

No.	**Proposed name: Aptensio XR (Methylphenidate Hydrochloride) Extended-release Capsules** **Strength(s): 10 mg, 15 mg, 20 mg, 30 mg, 40 mg, 50 mg, 60 mg** (b) (4) **Usual Dose: 10 mg to** (b) (4) **mg orally once daily in the morning**	**POCA Score (%)**	**Orthographic and/or phonetic differences in the names sufficient to prevent confusion**
1.	N/A		

Appendix D: Moderately Similar Names (e.g., combined POCA score is ≥50% to ≤69%) with no overlap or numerical similarity in Strength and/or Dose

No.	Proposed Name	POCA Score (%)
1.	APLENZIN	60
2.	Apexicon	52
3.	Asepso	52
4.	ANEXSIA	50
5.	ANEXSIA 5/325	50
6.	ANEXSIA 7.5/325	50
7.	ANEXSIA 7.5/650	50

Appendix E: Moderately Similar Names (e.g., combined POCA score is ≥50% to ≤69%) with overlap or numerical similarity in Strength and/or Dose

No.	**Proposed name: Aptensio XR (Methylphenidate Hydrochloride) Extended-release Capsules** **Strength(s): 10 mg, 15 mg, 20 mg, 30 mg, 40 mg, 50 mg, 60 mg** (b) (4) **Usual Dose: 10 mg to** (b) (4) **mg orally once daily in the morning**	**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)	64	The prefixes/suffixes of this name pair have sufficient orthographic differences. The first syllables of this name pair sound different.
2.	tensiLON	58	The prefixes/infixes of this name pair have sufficient orthographic differences. The first/second/third syllables of this name pair sound different. The root name Aptensio contains an extra syllable.
3.	ASTEPRO	57	The suffixes of this name pair have sufficient orthographic differences. The second/third syllables of this name pair sound different. The root name Aptensio contains an extra syllable.
4.	Actedril	56	The suffixes of this name pair have sufficient orthographic differences. The second/third syllables of this name pair sound different. The root name Aptensio contains an extra syllable.
5.	AKYNZEO	56	The prefixes/infixes of this name pair have sufficient orthographic differences. The first/second syllables of this name pair sound different.
6.	aptIVUS	56	The suffixes of this name pair have sufficient orthographic differences. The third syllables of this name pair sound different. The root name Aptensio contains an extra syllable.

No.	Proposed name: Aptensio XR (Methylphenidate Hydrochloride) Extended-release Capsules Strength(s): 10 mg, 15 mg, 20 mg, 30 mg, 40 mg, 50 mg, 60 mg (b) (4) Usual Dose: 10 mg to (b) (4) mg orally once daily in the morning	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
7.	(b) (4)	56	The prefixes/suffixes of this name pair have sufficient orthographic differences. The second/third syllables of this name pair sound different.
8.	Zaptec PSE	56	The prefixes/suffixes of this name pair have sufficient orthographic differences. The second syllables of this name pair sound different. The root name Aptensio contains two extra syllables as compared to the root name Zaptec.
9.	ACTINEX	54	The suffixes of this name pair have sufficient orthographic differences. The third syllables of this name pair sound different. The root name Aptensio contains an extra syllable.
10.	aptIOM	54	The suffixes of this name pair have sufficient orthographic differences. The third syllables of this name pair sound different. The root name Aptensio contains an extra syllable.
11.	AQUAtensEN	54	The infixes of this name pair have sufficient orthographic differences. The first/second/third/fourth syllables of this name pair sound different.
12.	METAtensiN #2	54	The prefixes/infixes of this name pair have sufficient orthographic differences. The first/third/fourth syllables of the root names of this name pair sound different.

No.	Proposed name: Aptensio XR (Methylphenidate Hydrochloride) Extended-release Capsules Strength(s): 10 mg, 15 mg, 20 mg, 30 mg, 40 mg, 50 mg, 60 mg (b) (4) Usual Dose: 10 mg to (b) (4) mg orally once daily in the morning	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
13.	METAtensiN #4	54	The prefixes/infixes of this name pair have sufficient orthographic differences. The first/third/fourth syllables of the root names of this name pair sound different.
14.	(b) (4)	54	The prefixes/infixes of this name pair have sufficient orthographic differences. The first/second/third syllables of the root names of this name pair sound different. The root name Aptensio contains an extra syllable.
15.	RAUtensiN	54	The prefixes of this name pair have sufficient orthographic differences. The first syllables of this name pair sound different. The root name Aptensio contains an extra syllable.
16.	(b) (4)	54	The prefixes/suffixes of this name pair have sufficient orthographic differences. The first/second syllables of this name pair sound different. The root name Aptensio contains two extra syllables.
17.	ACTEMRA	53	The suffixes of this name pair have sufficient orthographic differences. The third syllables of this name pair sound different. The root name Aptensio contains an extra syllable.
18.	LOtensiN	53	The prefixes of this name pair have sufficient orthographic differences. The first syllables of this name pair sound different. The root name Aptensio contains an extra syllable.

No.	Proposed name: Aptensio XR (Methylphenidate Hydrochloride) Extended-release Capsules Strength(s): 10 mg, 15 mg, 20 mg, 30 mg, 40 mg, 50 mg, 60 mg (b) (4) Usual Dose: 10 mg to (b) (4) mg orally once daily in the morning	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
19.	Acticin	52	The suffixes of this name pair have sufficient orthographic differences. The third syllables sound different. The root name Aptensio contains an extra syllable.
20.	AKten	52	The prefixes/infixes/suffixes of this name pair have sufficient orthographic differences. The root name Aptensio contains two extra syllables.
21.	WYtensiN	52	The prefixes of this name pair have sufficient orthographic differences. The first syllables of this name pair sound different. The root name Aptensio contains an extra syllable.
22.	ADENOSINE	51	The prefixes/infixes/suffixes of this name pair have sufficient orthographic differences. The first/third/fourth syllables of this name pair sound different.
23.	Antitussin	51	The infixes of this name pair have sufficient orthographic differences. The first/third/fourth syllables of this name pair sound different.
24.	aptryxol	51	The infixes/suffixes of this name pair have sufficient orthographic differences. The second/third syllables of this name pair sound different. The root name Aptensio contains an extra syllable.
25.	Actamin	50	The suffixes of this name pair have sufficient orthographic differences. The third syllables of this name pair sound different. The root name Aptensio contains an extra syllable.

No.	Proposed name: Aptensio XR (Methylphenidate Hydrochloride) Extended-release Capsules Strength(s): 10 mg, 15 mg, 20 mg, 30 mg, 40 mg, 50 mg, 60 mg (b) (4) Usual Dose: 10 mg to (b) (4) mg orally once daily in the morning	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
26.	ACTONEL	50	The suffixes of this name pair have sufficient orthographic differences. The third syllables of this name pair sound different. The root name Aptensio contains an extra syllable.
27.	Afatinib	50	The infixes/suffixes of this name pair have sufficient orthographic differences. The second/third/fourth syllables of this name pair sound different.
28.	DaptOMYCIN	50	The infixes of this name pair have sufficient orthographic differences. The second/third/fourth syllables of this name pair sound different.
29.	HMS Suspension	50	The prefixes/infixes/suffixes of this name pair have sufficient orthographic differences. The first/second/third syllables of this name pair sound different. The root name Aptensio contains an extra syllable as compared to the name HMS.
30.	SALUtensiN	50	The prefixes of this name pair have sufficient orthographic differences. The first/second/third/fourth syllables of the root names of this name pair sound different.

Appendix F: Low Similarity Names (e.g., combined POCA score is ≤49%)

No.	Name	POCA Score (%)
1.	Albuterol	39
2.	Tenormin	32

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.	aptensio***	100	This is the root name of the name currently under review.
2.	aptensio XR***	74	This is the name currently under review.
3.	Atensine	64	This name was not found in our usual drug information databases.
4.	Antatens	62	This name was not found in our usual drug information databases.
5.	Antepsin	58	This name was not found in our usual drug information databases.
6.	tensium	58	This name was not found in our usual drug information databases.
7.	ACTISITE	56	This product has been discontinued and there are no generics available. Dosing information could not be found in our usual drug information databases.
8.	Apsifen F	54	This name was not found in our usual drug information databases.
9.	AtenixCo	54	This name was not found in our usual drug information databases.
10.	Ephensin-LA	54	This name was not found in our usual drug information databases.
11.	Metatensin	54	This root name (without a modifier) could not be found in our usual drug information databases. The names Metatensin (b) (4) and Metatensin (b) (4) were identified and are evaluated in Appendix E.
12.	Actacin	52	This name was not found in our usual drug information databases.
13.	Antinaus	52	This name was not found in our usual drug information databases.
14.	Antinaus 50	52	This name was not found in our usual drug information databases.
15.	Apsifen	52	This name was not found in our usual drug information databases.

No.	Name	POCA Score (%)	Failure preventions
16.	Actilyse	51	This name was not found in our usual drug information databases.
17.	(b) (4) ***	51	This was an alternate name that was not reviewed by DMEPA. The approved product is named Tybost.
18.	(b) (4) ***	51	This name was found unacceptable. The approved product is named Plan B One Step.
19.	(b) (4) ***	51	This name was found unacceptable because of misbranding concerns.
20.	ACTIN-N	50	This product has been discontinued. Dosing information could not be found in our usual drug information databases.
21.	Astemizole	50	This product was withdrawn from the market for safety reasons.
22.	Captan	50	This name was not found in our usual drug information databases.
23.	K-C Suspension	50	This product has been discontinued. There were no products with the same ingredients and strength identified in our usual drug information databases and the dosing information. The dosing information for this product could not be found in our usual drug information databases.

Appendix H: Names not likely to be confused due to notable spelling, orthographic and phonetic differences.

No.	Name	POCA Score (%)
1.	Heptanes	58
2.	OPTISON	55
3.	1,2-octanediol	54
4.	ENTYVIO	54
5.	Depandro 100	53
6.	(b) (4)***	53
7.	Isoptin SR	53
8.	Katinko	52
9.	(b) (4)***	52
10.	OPTIMINE	52
11.	OPTOMYCIN	52
12.	Peptones	52
13.	Optil SR	51
14.	Ed-In-Sol	50
15.	(b) (4)***	50
16.	EPIPEN JR.	50
17.	Eprident	50
18.	HSP Anti	50
19.	Opdivo***	50
20.	Optimax	50

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/s/

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11/24/2014

IRENE Z CHAN
11/24/2014