APPLICATION NUMBER:

210566Orig1s000

OTHER REVIEW(S)
DATE OF THIS REVIEW: May 22, 2018
REQUESTING OFFICE OR DIVISION: Division of Dermatology and Dental Products (DDDP)
APPLICATION TYPE AND NUMBER: NDA 210566
PRODUCT NAME AND STRENGTH: Halobetasol Propionate Foam, 0.05%
PRODUCT TYPE: Single Ingredient Product
RX OR OTC: Rx
APPLICANT/Sponsor Name: Therapeutics Inc.
FDA RECEIVED DATE: July 28, 2017
OSE RCM #: 2017-1620-1
DMEPA SAFETY EVALUATOR: Carlos M Mena-Grillasca, BS Pharm
DMEPA TEAM LEADER: Sarah K. Vee, PharmD
1 PURPOSE OF MEMORANDUM

The Division of Dermatology and Dental Products requested that we review the revised container labels and carton labeling for Halobetasol Propionate (Appendix A) to determine if it is acceptable from a medication error perspective. The revisions are in response to recommendations that we made during a previous label and labeling review.\(^a\)

We note that DMEPA found the proposed proprietary name conditionally acceptable.\(^b\) However, the Applicant withdrew the proposed name on May 21, 2018. Therefore, the applicant submitted revised container labels and carton labeling without a proprietary name.

2 CONCLUSION

The revised container labels and carton labeling for halobetasol propionate foam are acceptable from a medication error perspective.

\(^a\) Mena-Grillasca C. Label and Labeling review for (NDA 210566). Silver Spring (MD): FDA, CDER, OSE, DMEPA (US); 2018 MAR 21. RCM No.: 2017-1620.

\(^b\) Abraham S. Proprietary Name Review for (NDA 210566). Silver Spring (MD): FDA, CDER, OSE, DMEPA (US); 2018 May 4. RCM No.: 2018-20850203
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/s/

CARLOS M MENA-GRILLASCA
05/22/2018

SARAH K VEE
05/22/2018
LABEL, LABELING, AND PACKAGING REVIEW
Division of Medication Error Prevention and Analysis (DMEPA)
Office of Medication Error Prevention and Risk Management (OMERPM)
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: March 21, 2018
Requesting Office or Division: Division of Dermatology and Dental Products (DDDP)
Application Type and Number: NDA 210566
Product Name and Strength: (halobetasol propionate) Foam, 0.05%
Product Type: Single Ingredient Product
Rx or OTC: Rx
Applicant/Sponsor Name: Therapeutics Inc.
FDA Received Date: July 28, 2017
OSE RCM #: 2017-1620
DMEPA Safety Evaluator: Carlos M Mena-Grillasca, BS Pharm
DMEPA Team Leader: Sarah K. Vee, PharmD

a Proposed proprietary name currently under review (OSE Panorama # 2018-20850203).
1 REASON FOR REVIEW

This review evaluates the proposed container labels, carton labeling, Instructions for Use (IFU) and Prescribing Information (PI), for *(halobetasol propionate) foam* (NDA 210566). The Applicant submitted NDA 210566, a 505(b)(1) application, on July 28, 2017.

2 MATERIALS REVIEWED

We considered the materials listed in Table 1 for this review. The Appendices provide the methods and results for each material reviewed.

<table>
<thead>
<tr>
<th>Table 1. Materials Considered for this Label and Labeling Review</th>
</tr>
</thead>
<tbody>
<tr>
<td>Material Reviewed</td>
</tr>
<tr>
<td>Product Information/Prescribing Information</td>
</tr>
<tr>
<td>Previous DMEPA Reviews</td>
</tr>
<tr>
<td>Human Factors Study</td>
</tr>
<tr>
<td>ISMP Newsletters</td>
</tr>
<tr>
<td>FDA Adverse Event Reporting System (FAERS)*</td>
</tr>
<tr>
<td>Other</td>
</tr>
<tr>
<td>Labels and Labeling</td>
</tr>
</tbody>
</table>

N/A = not applicable for this review

*We do not typically search FAERS for our label and labeling reviews unless we are aware of medication errors through our routine postmarket safety surveillance.

3 OVERALL ASSESSMENT OF THE MATERIALS REVIEWED

The Applicant is proposing to market *(halobetasol propionate) foam* in 50 g cans and 2 x 50 g cans packaging configurations. We note that Ultravate (halobetasol propionate) cream and ointment is marketed in 50 g tubes and 2 x 50 g tubes packaging configurations. Therefore, we find the applicant’s proposed package sizes adequate.

We reviewed the container labels and carton labeling and noted the following deficiencies:

The established name is not at least ½ the size of the proprietary name and does not meet 21 CFR 201.10(g)(2) taking into consideration the condensed font used for the presentation of the established name.

The Rx Only statement is more prominent than other more important information on the label, such as the established name, dosage form, and strength.

The route of administration statements ‘For Topical Use Only’ and ‘Not for ophthalmic, oral, or intravaginal use’ should be presented with white space between them to avoid confusion.

The carton labeling should include the statement ‘Shake well before each application and invert can to dispense’ to ensure correct use of the product.

The dosage statement *(halobetasol propionate) foam* is not clear to the layperson and can be improved to read ‘Do not use more than 50 grams per week’.

The 17 g container label is small and the information on the side panel is crowded and difficult to read. Per 21 CFR 201.10(i) small labels are only required to bear the proprietary name, established name, strength, lot number, expiration date, and name of manufacturer.
We provide recommendations for Therapeutics Inc. in section 4.2 to address these deficiencies.

In addition, we reviewed the Instructions for Use and note that the images used throughout the IFU are not clear. Ideally, the IFU should use pictures; alternatively, the applicant may use high quality images. We provided recommendations to the Patient Labeling reviewer to address this deficiency.

4 CONCLUSION & RECOMMENDATIONS

We find the proposed packaging configuration acceptable. We recommend the following label and labeling revision be implemented prior to approval of this NDA.

4.1 RECOMMENDATIONS FOR THERAPEUTICS INC.

A. General Recommendations (all container labels and carton labeling; 17 g, 50 g, 2 x 50 g)
   1. Revise the presentation of the established name to ensure that it is at least ½ the size of the proprietary name taking into account all pertinent factors, including typography, layout, contrast, and other printing features per CFR 201.10(g)(2). We find that the condensed font size for the presentation of the established name is not commensurate in size to the proprietary name.
   2. Revise the route of administration statements ‘For Topical Use Only’ and ‘Not of Ophthalmic, Oral, or Intravaginal Use’ to provide white space between the two statements. In addition, the positive statement ‘For Topical Use Only’ should be more prominent by bolding and/or using a contrasting color font. Finally, ensure that the word ‘Not’ is not presented separated from the rest of the statement at the end of the line.

For example:

**For Topical Use Only**

Not for Ophthalmic, Oral, or Intravaginal Use

3. Revise the placeholder with the actual NDC numbers.

4. Revise the ‘Rx Only’ statement to reduce its prominence by removing the color blocking and bolding. As currently presented it is more prominent than more relevant information on the labels and labeling.

B. Container Label (17 g)
   1. This is a small label and the information presented on the side panel is crowded and in small font, making it difficult to read. Therefore, revise the back panel to delete the

C. Carton Labeling (17 g, 50 g, 2 x 50 g)
   1. Revise the statements on the side panel where the dosing information is present:
      i. Add the statement ‘Shake well before each application and invert can to dispense’ at the top of the section.
      ii. Revise the statement ‘Do not use more than 50 grams per week’.
      iii. Revise the statement ‘Each gram contains…’ to read ‘See package insert for full Prescribing Information, Patient Information, and Instructions for Use’.
      iv. Allow blank space between the statements ‘Shake well...’ and ‘Usual dosage...’ and ‘Each gram contains...’ to improve clarity and readability.

D. Carton Labeling (2 x 50 g)

Reference ID: 4237497
Reference ID: 4271684
APPENDIX A. PRODUCT INFORMATION/PRESCRIBING INFORMATION

Table 2 presents relevant product information for received on July 28, 2017 from Therapeutics Inc.

<table>
<thead>
<tr>
<th>Initial Approval Date</th>
<th>n/a</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Ingredient</td>
<td>halobetasol propionate</td>
</tr>
<tr>
<td>Indication</td>
<td>Treatment of plaque psoriasis in patients 18 years of age and older.</td>
</tr>
<tr>
<td>Route of Administration</td>
<td>Topical</td>
</tr>
<tr>
<td>Dosage Form</td>
<td>Foam</td>
</tr>
<tr>
<td>Strength</td>
<td>0.05%</td>
</tr>
<tr>
<td>Dose and Frequency</td>
<td>Apply a thin film to the affected skin twice for up to two weeks.</td>
</tr>
<tr>
<td>How Supplied</td>
<td>17 g sample cans; 50 g cans and 2 x 50 g cans</td>
</tr>
<tr>
<td>Storage</td>
<td>20°-25°C (68°-77°F)</td>
</tr>
<tr>
<td>Container Closure</td>
<td>Aluminum cans</td>
</tr>
</tbody>
</table>
APPENDIX B. PREVIOUS DMEPA REVIEWS

On March 19, 2018, we searched DMEPA’s previous reviews using the terms, halobetasol propionate and NDA 210566. Our search did not retrieve any previous relevant labeling review.

APPENDIX C. HUMAN FACTORS STUDY

N/A

APPENDIX D. ISMP NEWSLETTERS

N/A

APPENDIX E. FDA ADVERSE EVENT REPORTING SYSTEM (FAERS)

N/A

APPENDIX F. OTHER SOURCES

N/A
APPENDIX G. LABELS AND LABELING

G.1 List of Labels and Labeling Reviewed

Using the principles of human factors and Failure Mode and Effects Analysis, along with postmarket medication error data, we reviewed the following labels and labeling submitted by Therapeutics Inc.

- Container label and carton labeling received on March 07, 2018
- Instructions for Use received on October 30, 2017
- Prescribing Information (Image not shown) received on October 30, 2017

G.2 Label and Labeling Images (not to scale)

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/s/

CARLOS M MENA-GRILLASCA
03/21/2018

SARAH K VEE
03/21/2018
PATIENT LABELING REVIEW

Date: March 19, 2018

To: Kendall Marcus, MD
    Director
    Division of Dermatology and Dental Products (DDDP)

Through: LaShawn Griffiths, MSHS-PH, BSN, RN
         Associate Director for Patient Labeling
         Division of Medical Policy Programs (DMPP)

         Barbara Fuller, RN, MSN, CWOCN
         Team Leader, Patient Labeling
         Division of Medical Policy Programs (DMPP)

From: Susan Redwood, MPH, BSN, RN
      Patient Labeling Reviewer
      Division of Medical Policy Programs (DMPP)

      Jina Kwak, PharmD
      Regulatory Review Officer
      Office of Prescription Drug Promotion (OPDP)

Subject: Review of Patient Labeling: Patient Package Insert (PPI) and Instructions for Use (IFU)

Drug Name (established name): TRADENAME (halobetasol propionate) Foam

Dosage Form and Route: 0.05%, for topical use

Application Type/Number: NDA 210566

Applicant: Therapeutics Inc.
1 INTRODUCTION
On July 28, 2017, Therapeutics Inc., submitted for the Agency’s review an original New Drug Application (NDA) 210566 for TRADENAME (halobetasol propionate) Foam, 0.05%. The proposed indication for TRADENAME (halobetasol propionate) Foam, 0.05% is for the topical treatment of plaque psoriasis in patients 18 years of age and older.

This collaborative review is written by the Division of Medical Policy Programs (DMPP) and the Office of Prescription Drug Promotion (OPDP) in response to a request by the December 18, 2017 for DMPP and OPDP to review the Applicant’s proposed Patient Package Insert (PPI) and Instructions for Use (IFU) for TRADENAME (halobetasol propionate) Foam, 0.05%.

DMPP conferred with the Division of Medication Error, Prevention, and Analysis (DMEPA) and a separate DMEPA review of the IFU will be forthcoming.

2 MATERIAL REVIEWED
• Draft TRADENAME (halobetasol propionate) Foam, 0.05% PPI and IFU received on July 28, 2017, revised by the Review Division throughout the review cycle, and received by DMPP and OPDP on March 13, 2018.

• Draft TRADENAME (halobetasol propionate) Foam, 0.05% Prescribing Information (PI) received on December 18, 2017, revised by the Review Division throughout the review cycle, and received by DMPP and OPDP on March 13, 2018.

• Approved OLUX (clobetasol propionate) foam, 0.05% comparator labeling dated April 23, 2014.

3 REVIEW METHODS
To enhance patient comprehension, materials should be written at a 6th to 8th grade reading level, and have a reading ease score of at least 60%. A reading ease score of 60% corresponds to an 8th grade reading level. In our review of the PPI and IFU, the target reading level is at or below an 8th grade level.

Additionally, in 2008 the American Society of Consultant Pharmacists Foundation (ASCP) in collaboration with the American Foundation for the Blind (AFB) published Guidelines for Prescription Labeling and Consumer Medication Information for People with Vision Loss. The ASCP and AFB recommended using fonts such as Verdana, Arial or APHont to make medical information more accessible for patients with vision loss. We reformatted the PPI and IFU document using the Arial font, size 10.

In our collaborative review of the PPI and IFU we:
• simplified wording and clarified concepts where possible
• ensured that the PPI and IFU are consistent with the Prescribing Information (PI)
• removed unnecessary or redundant information
• ensured that the PPI and IFU are free of promotional language or suggested revisions to ensure that it is free of promotional language
• ensured that the PPI and IFU meet the criteria as specified in FDA’s Guidance for Useful Written Consumer Medication Information (published July 2006)
• ensured that the PPI and IFU are consistent with the approved labeling where applicable.

4 CONCLUSIONS
The PPI and IFU are acceptable with our recommended changes.

5 RECOMMENDATIONS
• Please send these comments to the Applicant and copy DMPP and OPDP on the correspondence.
• Our collaborative review of the PPI and IFU are appended to this memorandum. Consult DMPP and OPDP regarding any additional revisions made to the PI to determine if corresponding revisions need to be made to the PPI and IFU.

Please let us know if you have any questions.
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/s/

SUSAN W REDWOOD
03/19/2018

JINA KWAK
03/19/2018

BARBARA A FULLER
03/19/2018

LASHAWN M GRIFFITHS
03/19/2018
Memorandum

Date: March 15, 2018

To: Amy Woitach, DO
    Medical Officer
    Division of Dermatology and Dental Products (DDDP)

    David Kettl, MD
    Clinical Team Leader
    DDDP

    Cristina Attinello, MPH
    Senior Regulatory Project Manager
    DDDP

From: Jina Kwak, PharmD
    Regulatory Review Officer
    Office of Prescription Drug Promotion (OPDP)

Subject: NDA 210566
    OPDP labeling comments for halobetasol propionate foam, 0.05%,
    for topical use

In response to DDDP consult request dated December 18, 2017, OPDP has reviewed the proposed product labeling (PI), patient package insert (PPI), Instructions for Use (IFU) and carton and container labeling for NDA submission for halobetasol propionate foam, 0.05%.

OPDP’s comments on the proposed labeling are based on the draft PI and PPI and IFU received by electronic mail from DDDP on March 13, 2018 and are provided below.

A combined OPDP and Division of Medical Policy Programs (DMPP) review will be completed and comments on the proposed PPI and IFU will be sent under separate cover.

OPDP has reviewed the proposed carton and container labeling submitted by the Sponsor to the electronic document room on March 7, 2018 and we do not have any comments.
Thank you for your consult. If you have any questions, please contact Jina Kwak: 301-796-4809; Jina.Kwak@fda.hhs.gov

19 Page(s) of Draft Labeling have been Withheld in Full as b4 (CCI/TS) immediately following this page
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/s/

JINA KWAK
03/15/2018