

**CENTER FOR DRUG EVALUATION AND
RESEARCH**

APPLICATION NUMBER:

761065Orig1s000

PROPRIETARY NAME REVIEW(S)

MEMORANDUM
NONPROPRIETARY NAME SUFFIX

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:	September 20, 2017
Requesting Office or Division:	Division of Antiviral Products (DAVP)
Application Type and Number:	BLA 761065
Product Name and Strength:	Trogarzo (ibalizumab) injection, 150 mg/mL
Total Product Strength:	200 mg/1.33 mL
Product Type:	Single-ingredient product
Rx or OTC:	Rx
Applicant/Sponsor Name:	TaiMed Biologics, Inc.
Panorama #:	2017-857
DMEPA Primary Reviewer:	Nasim Roosta, PharmD
OMEPRM Deputy Director (Acting):	Lubna Merchant, MS, PharmD

1 PURPOSE OF MEMO

This memorandum summarizes our evaluation of the four-letter suffix for inclusion in the nonproprietary name and communicates our recommendation for the nonproprietary name for BLA 761065.

2 ASSESSMENT OF THE NONPROPRIETARY NAME

TaiMed Biologics, Inc. was notified of the Agency's intention to designate a proper name that includes a four-letter distinguishing suffix that is devoid of meaning for its product in an advice letter^a.

2.1 *Ibalizumab- uiyk*

FDA generated a four letter suffix, -uiyk. This suffix was evaluated against the criteria described in the guidance^b.

We determined that the FDA-generated suffix “-uiyk”, is not too similar to any other product's suffix designation, does not look similar to the names of other currently marketed products, that the suffix is devoid of meaning, and does not make any misrepresentations with respect to safety or efficacy of this product.

These findings were shared with the TBBS, ORP, OCC and OPDP. In email correspondence dated September 14, 2017 the workgroup concurred with DMEPA's assessment and conclusion.

3 CONCLUSION

We find the suffix “-uiyk” acceptable and recommend the nonproprietary name be revised throughout the draft labels and labeling to ibalizumab-uiyk.

3.1 RECOMMENDATIONS FOR THE APPLICANT.

We find the nonproprietary name, ibalizumab-uiyk, conditionally acceptable for your proposed product. Should your 351(a) BLA be approved during this review cycle, ibalizumab-uiyk will be the proper name designated in the license and you should revise your proposed labels and labeling accordingly. However, please be advised that if your application receives a complete response, the acceptability of the proposed suffix will be re-evaluated when you respond to the deficiencies. If we find the proposal unacceptable upon our re-evaluation, we would inform you of our finding.

^a Merchant, L. General Advice Letter for BLA 761065. Silver Spring (MD): FDA, CDER, OSE, DMEPA (US); 2017 JUL 10.

^b See Section VI which describes that any suffixes should be devoid of meaning in Guidance for Industry: Nonproprietary Naming of Biological Products. 2017. Available from <http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM459987.pdf>

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

NASIM N ROOSTA
09/20/2017

LUBNA A MERCHANT
09/20/2017

PROPRIETARY NAME REVIEW

Division of Medication Error Prevention and Analysis (DMEPA)
Office of Medication Error Prevention and Risk Management (OMEPRM)
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Date of This Review:	November 10, 2016
Application Type and Number:	IND 9776/Pre-BLA 761065
Product Name and Strength:	Trogarzo (ibalizumab) Injection, 150 mg/mL
Total Product Strength:	232.5 mg/1.55 mL
Product Type:	Single-ingredient Product
Rx or OTC:	Rx
Applicant/Sponsor Name:	TaiMed Biologics, Inc.
Panorama #:	2016-10044600
DMEPA Primary Reviewer:	Valerie Wilson, PharmD
DMEPA Team Leader:	Vicky Borders-Hemphill, PharmD

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1 INTRODUCTION

This review evaluates the proposed proprietary name, Trogarzo, 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 Addison Whitney Health.

1.1 PRODUCT INFORMATION

The following product information is provided in the September 6, 2016 proprietary name submission.

- Intended Pronunciation: troh-GAR-zoh
- Active Ingredient: ibalizumab
- Indication of Use: For the treatment of multidrug resistant (MDR) HIV-1 infection.
- Route of Administration: Intravenous
- Dosage Form: Solution for injection
- Strength: 150 mg/mL
- Dose and Frequency: Loading dose of 2000 mg IV infusion followed by a maintenance dose of 800 mg IV infusion two weeks later and once every two weeks thereafter
- How Supplied: This product will be available in 2 mL glass vials with rubber stopper and crimp, (b) (4) fill to deliver 1.33 mL. Each vial is intended for single-use only.
- Storage: Store at 2°C to 8°C, do not freeze.

2 RESULTS

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

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 Antiviral Products (DAVP) 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 name¹.

¹ USAN stem search conducted on 9/8/2016.

2.2.2 Components of the Proposed Proprietary Name

The Applicant indicated in their submission that the proposed name, Trogarzo, is not derived from any one particular concept. 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 FDA Name Simulation Studies

Eighty-three 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. 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 14, 2016 e-mail, the Division of Antiviral Products (DAVP) 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 $\geq 50\%$ retrieved from our POCA search² organized as highly similar, moderately similar or low similarity for further evaluation. Table 1 also includes names identified by Addison Whitney Health.

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 $\leq 69\%$	76
Low similarity name pair: combined match percentage score $\leq 49\%$	14

² POCA search conducted on 9/8/2016.

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

Our analysis of the 90 names contained in Table 1 determined none will 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 Antiviral Products (DAVP) via e-mail on November 8, 2016. At that time we also requested additional information or concerns that could inform our review. Per e-mail correspondence from the DAVP on November 10, 2016, they stated no additional concerns with the proposed proprietary name, Trogarzo.

3 CONCLUSIONS

The proposed proprietary name is acceptable.

If you have any questions or need clarifications, please contact Danyal Chaudhry, OSE project manager, at 301-796-3813.

3.1 COMMENTS TO THE APPLICANT

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

If any of the proposed product characteristics as stated in your September 6, 2016 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.

3. *Electronic Drug Registration and Listing System (eDRLS) database*

The electronic Drug Registration and Listing System (eDRLS) was established to support the FDA's Center for Drug Evaluation and Research (CDER) goal to establish a common Structured Product Labeling (SPL) repository for all facilities that manufacture regulated drugs. The system is a reliable, up-to-date inventory of FDA-regulated, drugs and establishments that produce drugs and their associated information.

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 DNDP. OPDP or DNDP 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 DNDP 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.³

³ 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 $\geq 70\%$.
 - 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. 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 $\geq 70\%$).

<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 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 as 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 $\leq 69\%$).

<p>Step 1</p>	<p>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.</p> <p>For single strength products, also consider circumstances where the strength may not be expressed.</p> <p>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.</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
<p>Step 2</p>	<p>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 <u>with</u> overlapping or similar strengths or doses.</p>

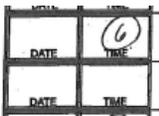
	Orthographic Checklist (Y/N to each question)	Phonetic Checklist (Y/N to each question)
	<ul style="list-style-type: none"> • Do the names begin with different first letters? Note that even when names begin with different first letters, certain letters may be confused with each other when scripted. • 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 <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? 	<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?

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, 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. Trogarzo Study (Conducted on 09/16/2016)

Handwritten Medication Order/Prescription	Verbal Prescription
<p>Medication Order:</p>  <p>Outpatient Prescription:</p> 	<p>Trogarzo 150mg/mL vial</p> <p>Bring to clinic</p> <p>Dispense 11 vials</p>

FDA Prescription Simulation Responses (Aggregate 1 Rx Studies Report)

<p>Study Name: Trogarzo</p> <p style="text-align: right;">309 People Received Study 83 People Responded</p>				
Total	36	24	23	
INTERPRETATION	OUTPATIENT	VOICE	INPATIENT	TOTAL
TOGARZO	0	0	2	2
TROGAIZO	1	0	0	1
TROGANYO	1	0	0	1
TROGANZO	6	0	0	6
TROGARDO	0	1	0	1
TROGARSO	0	1	0	1
TROGARZO	13	21	20	54
TROGARZO 2000 MG	0	0	1	1
TROGAYO	3	0	0	3
TROGAZO	12	0	0	12
TROGUARDZO	0	1	0	1

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

No.	Proposed name: Trogarzo Established name: ibalizumab Dosage form: injection Strength(s): 150 mg/mL Usual Dose: 2000 mg IV infusion, followed by 800 mg IV infusion every 2 weeks	POC A Score (%)	Orthographic and/or phonetic differences in the names sufficient to prevent confusion Other prevention of failure mode expected to minimize the risk of confusion between these two names.
1.	None		

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

No.	Name	POCA Score (%)
1.	Triderm	56
2.	Prograf	54
3.	Travasol	54
4.	Nitro-Par	52
5.	Tribenzor	52
6.	Tricor	52

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

No.	Proposed name: Trogarzo Established name: ibalizumab Dosage form: injection Strength(s): 150 mg/mL Usual Dose: 2000 mg IV infusion, followed by 800 mg IV infusion every 2 weeks	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.	Neutragard	59	The prefixes, infixes, and suffixes of this name pair have sufficient orthographic differences. The first, second, and third syllables of this name pair sound different.
2.	Tudorza	59	The infixes of this name pair have sufficient orthographic differences. The first and second syllables of this name pair sound different.
3.	Proclearz	58	The infixes and suffixes of this name pair have sufficient orthographic differences. The first and second syllables of this name pair sound different. Trogarzo contains an extra syllable.
4.	Trivaris	58	The infixes and suffixes of this name pair have sufficient orthographic differences. The second and third syllables of this name pair sound different.
5.	Periogard	57	The prefixes and suffixes of this name pair have sufficient orthographic differences. The first, second, and third syllables of this name pair sound different. Periogard contains an extra syllable.
6.	Caroguard	56	The prefixes and suffixes of this name pair have sufficient orthographic differences. The first, second, and third syllables of this name pair sound different.

No.	Proposed name: Trogarzo Established name: ibalizumab Dosage form: injection Strength(s): 150 mg/mL Usual Dose: 2000 mg IV infusion, followed by 800 mg IV infusion every 2 weeks	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.	Tagrisso	56	<p>The infixes of this name pair have sufficient orthographic differences.</p> <p>The first and second syllables of this name pair sound different.</p> <p>There is no strength overlap. Tagrisso is dosed once daily which affords an additional difference from Trogarzo “every 2 weeks” maintenance dosing frequency. Also, Trogarzo would be administered via IV infusion, necessitating the need for this to be expressed on a prescription which would afford an additional difference from Tagrisso, an orally administered product.</p>
8.	Treagan	56	<p>The infixes and suffixes of this name pair have sufficient orthographic differences.</p> <p>The first and second syllables of this name pair sound different. Trogarzo contains an extra syllable.</p>
9.	Trecator	56	<p>The infixes and suffixes of this name pair have sufficient orthographic differences.</p> <p>The second and third syllables of this name pair sound different.</p>
10.	Tri-Lo Marzia	56	<p>The infixes and suffixes of this name pair have sufficient orthographic differences.</p> <p>The second and third syllables of this name pair sound different. Tri-Lo Marzia contains extra syllables.</p>
11.	Tri-Kort	56	<p>The suffixes of this name pair have sufficient orthographic differences.</p> <p>The second syllables of this name pair sound different. Trogarzo contains an extra syllable.</p>

No.	Proposed name: Trogarzo Established name: ibalizumab Dosage form: injection Strength(s): 150 mg/mL Usual Dose: 2000 mg IV infusion, followed by 800 mg IV infusion every 2 weeks	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.	Tramadol	54	<p>The infixes and suffixes of this name pair have sufficient orthographic differences.</p> <p>The second and third syllables of this name pair sound different.</p>
13.	(b) (4) ***	52	<p>The infixes and suffixes of this name pair have sufficient orthographic differences.</p> <p>The second and third syllables of this name pair sound different.</p>
14.	Tri-Sudo	54	<p>The infixes and suffixes of this name pair have sufficient orthographic differences.</p> <p>The second and third syllables of this name pair sound different.</p>
15.	trocaine	53	<p>The infixes and suffixes of this name pair have sufficient orthographic differences.</p> <p>The second syllables of this name pair sound different. Trogarzo contains an extra syllable.</p>
16.	Corgard	52	<p>The prefixes and suffixes of this name pair have sufficient orthographic differences.</p> <p>The first syllables of this name pair sound different. Trogarzo contains an extra syllable.</p>
17.	Folgard OS	52	<p>The prefixes of this name pair have sufficient orthographic differences. The modifier “OS” could afford an additional difference if included on the prescription.</p> <p>The first syllables of this name pair sound different. Trogarzo contains an extra syllable.</p>

No.	Proposed name: Trogarzo Established name: ibalizumab Dosage form: injection Strength(s): 150 mg/mL Usual Dose: 2000 mg IV infusion, followed by 800 mg IV infusion every 2 weeks	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
18.	Paragard T 380A	52	<p>The prefixes and suffixes of this name pair have sufficient orthographic differences. The modifier “T 380 A” could afford an additional difference if included on the prescription.</p> <p>The first, second, and third syllables of this name pair sound different.</p>
19.	Trivora	52	<p>The infixes and suffixes of this name pair have sufficient orthographic differences.</p> <p>The second and third syllables of this name pair sound different.</p>
20.	Trivora-21	52	<p>The infixes and suffixes of this name pair have sufficient orthographic differences. The modifier “21” could afford an additional difference if included on the prescription.</p> <p>The second and third syllables of this name pair sound different.</p>
21.	Trivora-28	52	<p>The infixes and suffixes of this name pair have sufficient orthographic differences. The modifier “28” could afford an additional difference if included on the prescription.</p> <p>The second and third syllables of this name pair sound different.</p>
22.	Trokendi	52	<p>The infixes and suffixes of this name pair have sufficient orthographic differences.</p> <p>The second and third syllables of this name pair sound different.</p>
23.	Tubersol	52	<p>The infixes and suffixes of this name pair have sufficient orthographic differences.</p> <p>The second and third syllables of this name pair sound different.</p>

No.	Proposed name: Trogarzo Established name: ibalizumab Dosage form: injection Strength(s): 150 mg/mL Usual Dose: 2000 mg IV infusion, followed by 800 mg IV infusion every 2 weeks	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
24.	Tramacort	50	<p>The infixes and suffixes of this name pair have sufficient orthographic differences.</p> <p>The second and third syllables of this name pair sound different.</p>
25.	Translarna***	50	<p>The infixes and suffixes of this name pair have sufficient orthographic differences.</p> <p>The first and third syllables of this name pair sound different.</p>
26.	Trelstar LA	50	<p>The infixes and suffixes of this name pair have sufficient orthographic differences. The modifier “LA” could afford an additional difference if included on the prescription.</p> <p>The first and second syllables of this name pair sound different. Trogarzo contains an extra syllable.</p>
27.	Tricalm	50	<p>The suffixes of this name pair have sufficient orthographic differences.</p> <p>The second syllables of this name pair sound different. Trogarzo contains an extra syllable.</p>
28.	Tri-Pseudo	50	<p>The infixes and suffixes of this name pair have sufficient orthographic differences.</p> <p>The second and third syllables of this name pair sound different.</p>
29.	Troxyca***	50	<p>The infixes and suffixes of this name pair have sufficient orthographic differences.</p> <p>The second and third syllables of this name pair sound different.</p>
30.	Truvada	50	<p>The infixes and suffixes of this name pair have sufficient orthographic differences.</p> <p>The second and third syllables of this name pair sound different.</p>

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

No.	Name	POCA Score (%)
1.	Teflaro	44
2.	Tegretol	46
3.	Tradjenta	40
4.	Trazodone	49
5.	Troglitazone	48

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.	Nitrogard	65	Deactivated per Redbook 3/5/2003. No generics available.
2.	(b) (4) ***	63	Name entered by SE however (b) (4) *** alone was not officially reviewed as a proposed proprietary name. The applicant submitted the name (b) (4) *** which was found unacceptable. The product was later approved under the name Tri-Lo Marzia.
3.	Kroger	61	Name identified in RxNorm, however, does not specify the product for this store brand name.
4.	Fragarin	57	Name identified by RxNorm but unable to find product characteristics.
5.	Triacort	57	Discontinued ANDA 0877113. Withdrawn FR Effective 05/23/1994.
6.	Tonocard	56	Discontinued (NDA) 018257. Withdrawn FR Effective Status Date 06/16/2006.
7.	Progan	54	International product marketed in Australia.
8.	Travasol 10	54	International product marketed in Canada
9.	Travasol 2.75	54	Name identified in RxNorm but unable to find product characteristics in commonly used databases.

No.	Name	POCA Score (%)	Failure preventions
10.	Travasol 2.75/5	54	Name identified in RxNorm but unable to find product characteristics in commonly used databases.
11.	Travasol 3.5	54	International product marketed in Canada.
12.	Travasol 4.25/10	54	Identified in RxNorm but unable to find product characteristics in commonly used databases.
13.	Travasol 4.25/25	54	Identified in RxNorm but unable to find product characteristics in commonly used databases.
14.	Travasol 4.25/5	54	Identified in RxNorm but unable to find product characteristics in commonly used databases.
15.	Travasol 5.5	54	International product marketed in Canada.
16.	Travasol 8.5%	54	International product marketed in Canada.
17.	trovan	54	Discontinued (NDA) 020759. Withdrawn FR Effective Status Date 06/16/2006.
18.	trovan Iv	54	Deactivated per Redbook 7/10/2003. NDA 020760 Withdrawn FR Effective 06/16/2006
19.	Triac Cold	53	Deactivated per Redbook 11/22/2000. No generics available.
20.	Program	52	Veterinary product.
21.	Triperidol	52	International product marketed in Belgium, United Kingdom, France, and Germany.
22.	Trital Sr	52	Deactivated per Redbook 10/1/2009. No generics available.
23.	Eco-gard	51	Veterinary product.
24.	Pyrogallol	51	Not a drug product but Pyrogallol is a trihydroxybenzene or dihydroxy phenol that can be prepared by heating GALLIC ACID.
25.	Triaz	51	Deactivate per Redbook 9/23/2011.
26.	Trilocort	51	Identified in RxNorm but unable to find product characteristics in commonly used databases.
27.	Progabide	50	Identified in RxNorm but unable to find product characteristics in commonly used databases.
28.	Thytopar	50	Discontinued NDA 008682. Withdrawn FR Effective Status Date 11/12/2002.

No.	Name	POCA Score (%)	Failure preventions
29.	Totarol	50	Name identified in RxNorm but unable to find product characteristics in commonly used databases.
30.	Truxazole	50	Deactivated per Redbook 4/28/2009 with no generics available.
31.	(b) (4) ***	57	Proposed name that was withdrawn by the applicant on May 21, 2012. The product was later approved under the name Tri-Lo Marzia.
32.	(b) (4)		
33.			
34.			
35.			

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

No.	Name	POCA Score (%)
1.	Duragal-S	50
2.	Estraguard	52
3.	Fero-Grad	50
4.	Micro-Guard	50
5.	Norocarp	52
6.	Periguard	52
7.	Peroderm	50

No.	Name	POCA Score (%)
8.	Procardia	56
9.	Procort	53
10.	Procort 1.85/1.15	53
11.	Proderm	52
12.	Proklar	52
13.	Proscar	52
14.	Duragal-S	50

Appendix I: Names identified in the eDRLS database not likely to be confused due to notable spelling, orthographic and phonetic differences.

No.	Name
1.	None

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

VALERIE S WILSON
11/10/2016

BRENDA V BORDERS-HEMPHILL
11/10/2016