CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

212909Orig1s000

PROPRIETARY NAME REVIEW(S)

PROPRIETARY NAME REVIEW

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

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

Date of This Review:	August 7, 2019
Application Type and Number:	NDA 212909
Product Name and Strength:	Biorphen (phenylephrine hydrochloride) injection, 0.1 mg/mL (b) (4)
Total Product Strength:	0.5 mg/5 mL (b) (4)
Product Type:	Single Ingredient Product
Rx or OTC:	Prescription (Rx)
Applicant/Sponsor Name:	Sintetica SA (Sintetica)
Panorama #:	2019-31691963
DMEPA Safety Evaluator:	Sarah Thomas, PharmD
DMEPA Team Leader:	Otto L. Townsend, PharmD

Contents

1 INTRODUCTION

This review evaluates the proposed proprietary name, Biorphen, from a safety and misbranding perspective. The sources and methods used to evaluate the proposed proprietary name are outlined in the reference section and Appendix A respectively. Sintetica did not submit an external name study for this proposed proprietary name.

1.1 REGULATORY HISTORY

In the initial stage of DMEPA's review, we identified the proposed proprietary name, Biorphen, appeared to also be used for orphenadrine in the United Kingdom (UK). We communicated our preliminary findings to Sintetica on June 11, 2019 via information request to determine if Sintetica would like for us to move forward with review of their request for proprietary name review for Biorphen. Sintetica responded via email communication on June 17, 2019 with a request for us to continue our review of the name, Biorphen, and provided the following rationale for why the UK Biorphen product has low likelihood of confusion with the proposed U.S. Biorphen product under NDA 212909:

1. Sintetica's search in the Medicines & Healthcare products Regulatory Agency (MHRA) database did not retrieve a product named Biorphen. Also, while searching for the active ingredient "orphenadrine", the product list retrieved did not include the Biorphen product name. Sintetica interprets this to mean that the proprietary name has changed.
2. The two products (orphenadrine and phenylephrine) are different dosage forms used in different channels of therapy and commerce, as well as limited to different countries. Specifically, the liquid formulation of orphenadrine for the treatment of Parkinson's disease is usually prescribed by neurologists in an outpatient setting, and the prescription would likely be filled in a retail pharmacy. In contrast, the proposed phenylephrine injection will primarily be used in a hospital setting for the treatment of clinically significant hypotension and will be administered almost exclusively in the operating room by anesthesiologists. It will not be available for purchase on the internet. This will help to prevent confusion and wrong-drug medication errors.

Based on the response from Sintetica, we proceeded with our evaluation of the proposed proprietary name, Biorphen.

1.2 PRODUCT INFORMATION

The following product information is provided in the proprietary name submission received on May 15, 2019 and amendment received on May 23, 2019.

- Intended Pronunciation: BY-or-fen, or [baɪ-or-fen]
- Active Ingredient: phenylephrine hydrochloride
- Indication of Use: Treatment of clinically important hypotension resulting primarily from vasodilation in the setting of anesthesia.
- Route of Administration: intravenous
- Dosage Form: injection
- Strength: 0.5 mg/5 mL (0.1 mg/mL) (b) (4)

- Dose and Frequency:
    - Bolus intravenous injection:
        - The recommended initial dose is 40 mcg to 100 mcg administered by intravenous bolus.
        - May administer additional boluses every 1-2 minutes as needed with dose adjusted according to pressor response.
        - Maximum dose is 200 mcg (b) (4)
    - Intravenous infusion: 10 mcg/minute to 35 mcg/minute, titrating based on pressor response and blood pressure goal; not to exceed 200 mcg/minute.
- How Supplied:
    - Single-use ampule of 0.5 mg/5 mL (0.1 mg/mL) in cartons of 10 ampules (b) (4)
- Storage: Store ampules at 20°C to 25°C (68°C to 77°C) [see USP Controlled Room Temperature]. The diluted solution should not be held for more than 4 hours at room temperature or for more than 24 hours under refrigerated conditions.
- Reference Listed Drug/Reference Product: Vazculep (phenylephrine hydrochloride) injection, USP (NDA 204300)

2 RESULTS

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

2.1 MISBRANDING ASSESSMENT

The Office of Prescription Drug Promotion (OPDP) determined that Biorphen would not misbrand the proposed product. The Division of Medication Error Prevention and Analysis (DMEPA) and the Division of Anesthesia, Analgesia, and Addiction Products (DAAAP) concurred with the findings of OPDP's assessment for Biorphen.

2.2 SAFETY ASSESSMENT

The following aspects were considered in the safety evaluation of the proposed proprietary name, Biorphen.

2.2.1 United States Adopted Names (USAN) Search

The proposed proprietary name, Biorphen, contains the United States Adopted Name (USAN) stem '-io-' in the infix position used by the USAN Council to indicate iodine-containing contrast media products.[a] Proprietary names should usually not incorporate USAN stems in the position

[a] USAN stem search conducted on October 11, 2018.

that USAN designates for the stem.[b] The use of a USAN stem within proprietary names, even when used consistently with the USAN meaning, can result in multiple similar proprietary names and proprietary names that are similar to established names, thus increasing the chance of confusion among those drugs, which may compromise patient safety. To reduce the potential for confusion, USAN stems should usually not be incorporated into proprietary names.

However, we determined that the two-letter stem 'io' is often not distinct enough to be recognized as a USAN stem. We also note that USAN Council has allowed the use of the stem 'io' in established names (e.g., vortioxetine) as well as in other USAN stems (-tioxetine). This has resulted in conflicting stems, and therefore in those instances, the stem does not support the USAN Council naming convention or accurately indicate the pharmacological or chemical trait of the drug. Additionally, based on our post marketing experience, we do not have the same safety concerns with the two-letter stems, including 'io', that we have identified with USAN stems containing three or more letters.[c,d]

Therefore, we do not object to the inclusion of the two-letter USAN stem 'io', incorporated into the proposed proprietary name Biorphen.

2.2.2 Components of the Proposed Proprietary Name

Sintetica indicated in their submission that the proposed proprietary name, Biorphen, is derived from the combination of the words "Bior" + "phen", where the word "Bior" is taken from the company Bioren (which is part of the Sintetica SA group) and the word "phen" comes from Phenylephrine (active ingredient of the proposed product).

Per our proprietary naming guidance for industry,[e] proprietary names should not incorporate the sponsor's name across multiple products. This practice can result in creating multiple similar proprietary names, which might increase the risk of confusion among the products. The practice can be problematic when products are stored alphabetically in distributor or pharmacy locations or when products are ordered from alphabetized lists. Because this seems to be the first instance where Sintetica SA proposed a name containing the prefix "Bior-", we do not object to the inclusion of "Bior-" in this proposed name.

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.

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[b] Guidance for industry: Best practices in developing proprietary names for drugs. Draft Guidance May 2014. http://www fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM39899

[c] Institute for Safe Medication Practices. Safety briefs: Aripiprazole or rabeprazole? ISMP Med Saf Alert Acute Care. 2003;8(8):1-3.

[d] Institute for Safe Medication Practices. Safety Briefs. ISMP Med Saf Alert Acute Care. 2002;7(17):1-2.

[e] Guidance for industry: Best practices in developing proprietary names for drugs. Draft Guidance May 2014. http://www fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM39899

2.2.3 Comments from Other Review Disciplines at Initial Review

In response to the OSE, May 24, 2019 e-mail, the Division of Anesthesia, Analgesia, and Addiction Products (DAAAP) did not forward any comments or concerns relating to Biorphen at the initial phase of the review.

2.2.4 FDA Name Simulation Studies

Eighty-nine practitioners participated in DMEPA's prescription studies for Biorphen. 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.

2.2.5 Phonetic and Orthographic Computer Analysis (POCA) Search Results

Our POCA search[f] identified 211 names with a combined phonetic and orthographic score of ≥55% or an individual phonetic or orthographic score ≥70%. These names are included in Table 1 below.

2.2.6 Names Retrieved for Review Organized by Name Pair Similarity

Table 1 lists the number of names retrieved from our POCA search. These name pairs are organized as highly similar, moderately similar or low similarity for further evaluation.

Table 1. Names Retrieved for Review Organized by Name Pair Similarity

Similarity Category	Number of Names
Highly similar name pair: combined match percentage score ≥70%	9
Moderately similar name pair: combined match percentage score ≥55% to ≤ 69%	173
Low similarity name pair: combined match percentage score ≤54%	29

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

Our analysis of the 211 names contained in Table 1 determined none of the names will pose a risk for confusion with Biorphen as described in Appendices C through H.

2.2.8 Communication of DMEPA's Analysis at Midpoint of Review

DMEPA communicated our findings to the Division of Anesthesia, Analgesia, and Addiction Products (DAAAP) via e-mail on July 29, 2019. At that time we also requested additional information or concerns that could inform our review. Per e-mail correspondence from the

[f] POCA search conducted on May 31, 2019 in version 4.3.

Division of Anesthesia, Analgesia, and Addiction Products (DAAAP) on August 6, 2019, they stated no additional concerns with the proposed proprietary name, Biorphen.

3 CONCLUSION

The proposed proprietary name, Biorphen, is acceptable.

If you have any questions or need clarifications, please contact Davis Matthew, OSE project manager, at 240-402-4559.

3.1 COMMENTS TO SINTETICA SA

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

In addition, we have the following comments related to your product:

> In your Request for Proprietary Name Review, you state that the proposed proprietary name, Biorphen, is derived from the combination of the words "Bior" + "phen", where the word "Bior" is taken from the company Bioren (which is part of the Sintetica SA group). Because this seems to be the first instance where you proposed a name containing the prefix "Bior-", we do not object to the inclusion of "Bior-" in this proposed name. However, we recommend the following if you have plans for future product development:
>
> > Proprietary names should not incorporate the sponsor's name across multiple products (e.g., ABCName1, ABCName2, ABCName3, etc.). This practice can result in creating multiple similar proprietary names, which might increase the risk of confusion among the products. The practice can be problematic when products are stored alphabetically in distributor or pharmacy locations or when products are ordered from alphabetized lists. For more information, please see the Draft Guidance for Industry: Best Practices in Developing Proprietary Names for Drugs (2014) available at: https://www.fda.gov/downloads/drugs/guidances/ucm398997.pdf

If any of the proposed product characteristics as stated in your proprietary name submission received on May 15, 2019 and amendment received on May 23, 2019 are altered prior to approval of the marketing application, the name must be resubmitted for review.

4 REFERENCES

1. USAN Stems (https://www.ama-assn.org/about/united-states-adopted-names-approved-stems)

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 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. [g]

[g] 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 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 55% 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 ≥55% to ≤ 69%.

- Low similarity: combined match percentage score ≤54%.

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 are further evaluated to identify the presence of attributes that are known to cause name confusion.
    - Name attributes: We note that the beginning of the drug name plays a significant role in contributing to confusion. Additionally, drug name pairs that start with the same first letter and contain a shared letter string of at least 3 letters in both names are major contributing factor in the confusion of drug names[h]. We evaluate all moderately similar names retrieved from POCA to identify the above attributes. These names are further evaluated to identify overlapping or similar strengths or doses.
    - Product attributes: Moderately similar names of products that have overlapping or similar strengths or doses represent an area for concern for FDA. The dose and strength information is often located in close proximity to the drug name itself on prescriptions and medication orders, and the information 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) may be limited when the strength or dose overlaps. DMEPA reviews 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

[h] Shah, M, Merchant, L, Characteristics That May Help in the Identification of Potentially Confusing Proprietary Drug Names. Therapeutic Innovation & Regulatory Science, September 2016

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 does 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 ≥55% 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: • Alternative expressions of dose: 5 mL may be listed in the prescribing information, but the dose may be expressed in metric weight (e.g., 500 mg) or in non-metric units (e.g., 1 tsp, 1 tablet/capsule). Similarly, a strength or dose of 1000 mg may be expressed, in practice, as 1 g, or vice versa. • Trailing or deleting zeros: 10 mg is similar in appearance to 100 mg which may potentiate confusion between a name pair with moderate similarity. • Similar sounding doses: 15 mg is similar in sound to 50 mg
Step 2	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.

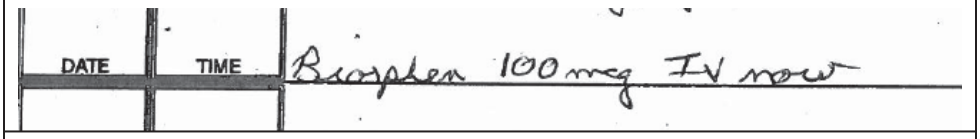
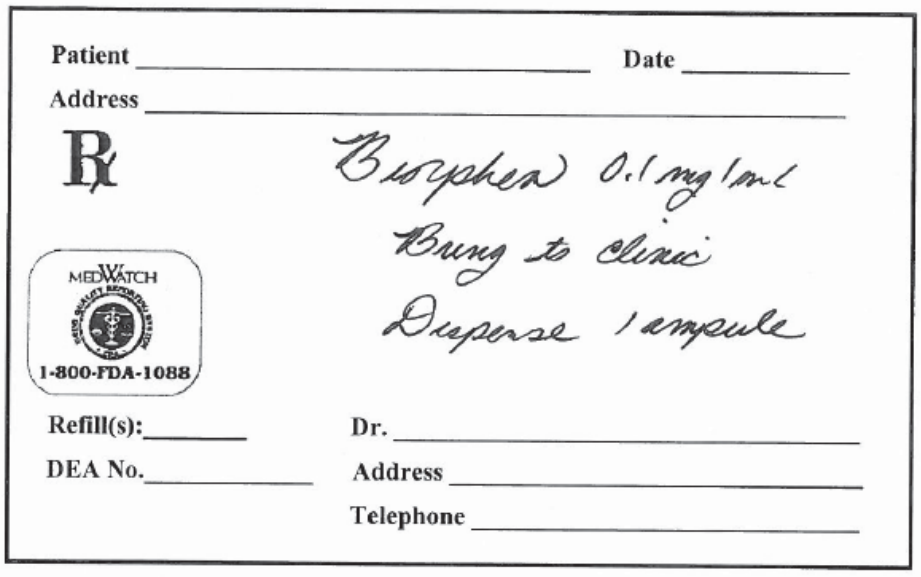
	Orthographic Checklist (Y/N to each question) • Do the names begin with different first letters? Note that even when names begin with different first letters, certain letters may be confused with each other when scripted. • Are the lengths of the names dissimilar* when scripted? *FDA considers the length 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 ≤54%).

Names with low similarity are generally acceptable unless there are data to suggest that the name might be vulnerable to confusion (e.g., prescription simulation study suggests that the name is likely to be misinterpreted as a marketed product). In these instances, we would reassign a low similarity name to the moderate similarity category and review according to the moderately similar name pair checklist.

Appendix B: **Prescription Simulation Samples and Results**

Figure 1. Biorphen Study (Conducted on May 31, 2019)

Handwritten Medication Order/Prescription	Verbal Prescription
Medication Order:  Outpatient Prescription:  	Biorphen 0.1 mg/mL Bring to clinic Dispense 1 ampule

FDA Prescription Simulation Responses (Aggregate Report)

Study Name: Biorphen

As of Date 6/19/2019

221 People Received Study

89 People Responded

Study Name: Biorphen

Total	**21**	**47**	**21**	**89**

INTERPRETATION	OUTPATIENT	VOICE	INPATIENT	TOTAL
BEORPHEN	1	0	0	1
BIBOFIN	0	1	0	1

BIOFRIN	0	1	0	1
BIOHORSEN	0	1	0	1
BIOPHAN	0	1	0	1
BIOPHEA	1	0	0	1
BIOPHEN	2	0	0	2
BIORFAN	0	1	0	1
BIORFEN	0	1	0	1
BIORFIN	0	2	0	2
BIORPHAN	0	12	0	12
BIORPHAN 0.1MG/ML	0	1	0	1
BIORPHANT	0	1	0	1
BIORPHEA	5	0	0	5
BIORPHEN	6	2	19	27
BIORPHENT	0	1	0	1
BIORPHIN	0	1	0	1
BIORTHIN	0	1	0	1
BIOSPHEN	0	0	1	1
BIOSPHERA	1	0	0	1
BIOYSHEA	2	0	0	2
BLOPHERA	1	0	0	1
BROYPHERA	1	0	0	1
BUYSHEA	1	0	0	1
BYMORPHIN	0	1	0	1
BYORFEN	0	2	0	2
BYORFEND	0	1	0	1

BYORFIN	0	1	0	1
BYORPAN	0	1	0	1
BYORPHAN	0	5	0	5
BYORPHEN	0	2	0	2
RIORPHEN	0	0	1	1
VIORFAN	0	1	0	1
VIORFIN	0	1	0	1
VIORPHAN	0	1	0	1
VIORPHAND	0	1	0	1
VYMORPHIN	0	1	0	1
VYORFIN	0	1	0	1
VYORPHIN	0	1	0	1

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

No.	**Proposed name:** Biorphen **Established name:** phenylephrine hydrochloride **Dosage form:** injection **Strength(s):** 0.5 mg/5 mL (0.1 mg/mL), (b) (4) **Usual Dose:** 40 mcg to 100 mcg intravenous bolus Q1-2 minutes prn, with max dose of 200 mcg (b) (4) (b) (4)	**POCA 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.	Banophen	72	The letter strings "ano" vs. "ior" have sufficient orthographic differences. The rimes of the first syllables ("ban" vs. "bi") and the second syllables (-or- vs. -o-) of this name pair sound different. In addition, both products are available in multiple, non-overlapping strengths; thus, providing differentiating product characteristics on a prescription.
2.	Barophen	79	Brand discontinued with no generic equivalents available. (b) (4)
3.	Biorphen	100	Proposed proprietary name is the subject of this review.
4.	Biotin	70	The suffixes (-phen- vs. tin-) of this name pair have sufficient orthographic differences. The third syllables (-fen vs. -ten) of this name pair sound different. In addition, both products are available in multiple, non-overlapping strengths; thus, providing differentiating product characteristics on a prescription.
5.	Bio-Tropin	70	Brand discontinued with no therapeutic equivalence (TE) codes provided per Drugs@FDA database, and off the market per Clinical Pharmacology database with no 4.8 mg powder for injection somatropin generic equivalents available. Also identified as an international product marketed in Israel and Mexico

No.	**Proposed name:** Biorphen **Established name:** phenylephrine hydrochloride **Dosage form:** injection **Strength(s):** 0.5 mg/5 mL (0.1 mg/mL). (b) (4) **Usual Dose:** 40 mcg to 100 mcg intravenous bolus Q1-2 minutes prn, with max dose of 200 mcg (b) (4) (b) (4)	**POCA 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.**
			per Micromedex Tox and Drug Product Results database.
6.	Chlorphen	70	Available Chlorphen products include Chlorphen SR, Chlorphen-12, and Medique Chlorphen. Therefore, a prescription for Chlorphen would require inclusion of the specific product. The prefixes (Bi- vs. Chlor-) of this name pair have sufficient orthographic differences. The first and second syllables (BY- vs. Chlor-, and -or- vs. -phen) of this name pair sound different. Biorphen has three syllables while Chlorphen has two syllables. Also, the modifiers SR, -12, and Medique provide differentiation when included in a prescription. In addition, both products are available in multiple, non-overlapping strengths; thus, providing differentiating product characteristics on a prescription.
7.	Chlor-Phen	70	Please see evaluation above under name "Chlorphen".
8.	Morphine	72	Name pair has sufficient orthographic and phonetic differences. The prefixes (Bi- vs. Mor-) of this name pair have sufficient orthographic differences, and the first (BY vs. Mor) and second syllables (-or- vs. -phine) of this name pair sound different. Biorphen has three syllables while Morphine has two syllables.

No.	**Proposed name:** Biorphen **Established name:** phenylephrine hydrochloride **Dosage form:** injection **Strength(s):** 0.5 mg/5 mL (0.1 mg/mL), (b) (4) **Usual Dose:** 40 mcg to 100 mcg intravenous bolus Q1-2 minutes prn, with max dose of (b) (4) 200 mcg (b) (4)	**POCA 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.**
9.	Zyrphen	71	Brand discontinued with no generic equivalents available per Micromedex Redbook database.

Appendix D: Moderately Similar Names (e.g., combined POCA score is ≥55% to ≤69%) with no overlap or numerical similarity in Strength and/or Dose

No.	Name	POCA Score (%)
10.	Domiphen	63

Appendix E: Moderately Similar Names (e.g., combined POCA score is ≥55% to ≤69%) with overlap or numerical similarity in Strength and/or Dose

No.	**Proposed name:** Biorphen **Established name:** phenylephrine hydrochloride **Dosage form:** injection **Strength(s):** 0.1 mg/mL (b) (4) **Usual Dose:** 40 mcg to 100 mcg intravenous bolus Q1-2 minutes prn, with max dose of 200 mcg (b) (4) (b) (4)	**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**
11.	Apomorphine	57	This name pair has sufficient orthographic and phonetic differences.
12.	Bee Pollen	58	This name pair has sufficient orthographic and phonetic differences.
13.	Berri-Freez	55	This name pair has sufficient orthographic and phonetic differences.
14.	Biaxin	60	This name pair has sufficient orthographic and phonetic differences.
15.	Bicarsim	60	This name pair has sufficient orthographic and phonetic differences.
16.	Biocef	56	This name pair has sufficient orthographic and phonetic differences.
17.	Biocorneum	56	This name pair has sufficient orthographic and phonetic differences.
18.	Biofed-Pe	59	This name pair has sufficient orthographic and phonetic differences.
19.	Biolon	63	This name pair has sufficient orthographic and phonetic differences.
20.	Bionafem	63	This name pair has sufficient orthographic and phonetic differences.
21.	Biore	52	This name pair has sufficient orthographic and phonetic differences.
22.	Bio-Statin	57	This name pair has sufficient orthographic and phonetic differences.
23.	Bio-Tab	57	This name pair has sufficient orthographic and phonetic differences.
24.	Biotussin	62	Biotussin AC/ Biotussin DAC and Biorphen have sufficient orthographic and phonetic differences.
25.	Boron	61	This name pair has sufficient orthographic and phonetic differences.

No.	**Proposed name:** Biorphen **Established name:** phenylephrine hydrochloride **Dosage form:** injection **Strength(s):** 0.1 mg/mL (b) (4) **Usual Dose:** 40 mcg to 100 mcg intravenous bolus Q1-2 minutes prn, with max dose of 200 mcg (b) (4) (b) (4)	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.	Brethine	58	This name pair has sufficient orthographic and phonetic differences.
27.	Bridion	56	This name pair has sufficient orthographic and phonetic differences.
28.	Bromphen Dx	52	This name pair has sufficient orthographic and phonetic differences. Bromphen was the root name for a brand of cough and cold products for which generic equivalents exist. Prescriptions for Bromphen would require inclusion of the modifier, dosage form, or other product characteristic that designates a specific cough and cold product.
29.	Brompheniramine	43	This name pair has sufficient orthographic and phonetic differences.
30.	Brufen	62	This name pair has sufficient orthographic and phonetic differences.
31.	Buphenyl	56	This name pair has sufficient orthographic and phonetic differences.
32.	Buprenorphine	57	This name pair has sufficient orthographic and phonetic differences.
33.	Bupropion	56	This name pair has sufficient orthographic and phonetic differences.
34.	Butorphanol	60	This name pair has sufficient orthographic and phonetic differences.
35.	Corphed	67	This name pair has sufficient orthographic and phonetic differences.
36.	Corphedra	56	This name pair has sufficient orthographic and phonetic differences.
37.	D-Biotin	59	This name pair has sufficient orthographic and phonetic differences.

No.	**Proposed name:** Biorphen **Established name:** phenylephrine hydrochloride **Dosage form:** injection **Strength(s):** 0.1 mg/mL (b) (4) **Usual Dose:** 40 mcg to 100 mcg intravenous bolus Q1-2 minutes prn, with max dose of 200 mcg (b) (4) (b) (4)	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**
38.	Delfen	52	This name pair has sufficient orthographic and phonetic differences.
39.	Dimaphen	62	This name pair has sufficient orthographic and phonetic differences.
40.	Diphen	65	This name pair has sufficient orthographic and phonetic differences.
41.	Diphen Af	55	This name pair has sufficient orthographic and phonetic differences.
42.	Diphenyl	55	This name pair has sufficient orthographic and phonetic differences.
43.	Dryphen	66	This name pair has sufficient orthographic and phonetic differences.
44.	Duraphen	69	This name pair has sufficient orthographic and phonetic differences.
45.	Fioricet	57	This name pair has sufficient orthographic and phonetic differences.
46.	Fiorpap	61	This name pair has sufficient orthographic and phonetic differences.
47.	Hyophen	56	This name pair has sufficient orthographic and phonetic differences.
48.	Iodopen	58	This name pair has sufficient orthographic and phonetic differences.
49.	Iophen Dm	58	This name pair has sufficient orthographic and phonetic differences.
50.	Iophen Dm Nr	49	This name pair has sufficient orthographic and phonetic differences.
51.	Iophen Nr	65	This name pair has sufficient orthographic and phonetic differences.
52.	Iophen-C Nr	55	This name pair has sufficient orthographic and phonetic differences.
53.	Masophen	62	This name pair has sufficient orthographic and phonetic differences.

No.	**Proposed name:** Biorphen **Established name:** phenylephrine hydrochloride **Dosage form:** injection **Strength(s):** 0.1 mg/mL (b) (4) **Usual Dose:** 40 mcg to 100 mcg intravenous bolus Q1-2 minutes prn, with max dose of 200 mcg (b) (4) (b) (4)	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**
54.	Miraphen Pse	55	This name pair has sufficient orthographic and phonetic differences.
55.	Morphabond	56	Name pair "Morphabond ER" and Biorphen has sufficient orthographic and phonetic differences.
56.	Myorisan	58	This name pair has sufficient orthographic and phonetic differences.
57.	Norepinephrine	44	This name pair has sufficient orthographic and phonetic differences.
58.	Norpace	55	This name pair has sufficient orthographic and phonetic differences.
59.	Obephen	66	This name pair has sufficient orthographic and phonetic differences.
60.	Orphenadrine	46	This name pair has sufficient orthographic and phonetic differences.
61.	Orphenate	57	This name pair has sufficient orthographic and phonetic differences.
62.	Orphengesic	46	This name pair has sufficient orthographic and phonetic differences.
63.	Pediaphen	57	This name pair has sufficient orthographic and phonetic differences.
64.	Riboprine	49	This name pair has sufficient orthographic and phonetic differences.
65.	Serophene	62	This name pair has sufficient orthographic and phonetic differences.
66.	Silphen	64	This name pair has sufficient orthographic and phonetic differences.
67.	Triphed	57	This name pair has sufficient orthographic and phonetic differences.
68.	Tylophen	60	This name pair has sufficient orthographic and phonetic differences.
69.	Urophen	64	This name pair has sufficient orthographic and phonetic differences.

No.	**Proposed name:** Biorphen **Established name:** phenylephrine hydrochloride **Dosage form:** injection **Strength(s):** 0.1 mg/mL (b) (4) **Usual Dose:** 40 mcg to 100 mcg intravenous bolus Q1-2 minutes prn, with max dose of 200 mcg (b) (4) (b) (4)	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**
70.	Versed	52	This name pair has sufficient orthographic and phonetic differences.

Appendix F: Low Similarity Names (e.g., combined POCA score is ≤54%)

No.	Name	POCA Score (%)
	N/A	

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
71.	Ambophen	63	Brand discontinued with no generic equivalents available per Micromedex Redbook database.
72.	B-12 Resin	64	Name identified in RxNorm database. Unable to find product characteristics in commonly used drug databases.
73.	Banophen M-S	56	Name identified in RxNorm database. Unable to find product characteristics in commonly used drug databases.
74.	Bellalphen	62	Brand discontinued with no generic equivalents available per Micromedex Redbook database.
75.	Bellaphen-S	56	Brand discontinued with no generic equivalents available per Micromedex Redbook database.
76.	Benproperine	50	International product marketed in Italy, China, Germany, and other countries per Micromedex Tox and Drug Product Results database.

No.	Name	POCA Score (%)	Failure preventions
77.	Benzophenone	51	International product marketed in Germany, Argentina, and other countries per Micromedex Tox and Drug Product Results database.
78.	Benzophenone-2	51	Name identified in RxNorm database. Unable to find product characteristics in commonly used drug databases. Per Google search, "In cosmetics and personal care products, Benzophenone-2, -6 and -8 are used in the formulation of aftershave lotion, bath products, bubble baths, colognes, perfumes, eye makeup removers, and other skin and hair care products."
79.	Benzophenone-5	51	Name identified in RxNorm database. Unable to find product characteristics in commonly used drug databases. Per Google search, "Benzophenone-5, Benzophenone-9 and Benzophenone-11 protect cosmetics and personal care products from deterioration by absorbing, reflecting, or scattering UV rays."
80.	Berman	58	Brand "Berman Mink Oil Paste" discontinued per Micromedex Tox and Drug Product Results database.
81.	Berocca Pn	55	Brand discontinued with no TE equivalents available per Drugs@FDA database.
82.	Bicozene	58	Brand discontinued with no generic equivalents available per Micromedex Redbook database.
83.	Biloptin	59	International product marketed in the United Kingdom, Germany, Greece, and other countries per Micromedex Tox and Drug Product Results database.
			(b) (4)
85.	Bio-Mycin	66	Bio-Mycin 200 is a veterinary product per DailyMed database.
86.	Biophylline	57	International product marketed in the United Kingdom per Micromedex Tox and Drug Product Results database.
87.	Bioral	60	International product marketed in the United Kingdom, Mexico, and other countries per Micromedex Tox and Drug Product Results database.

No.	Name	POCA Score (%)	Failure preventions
			(b) (4)
89.	Biperiden	63	Biperiden hydrochloride and lactate (Brand product name Akineton) discontinued with no generic equivalents available per Drugs@FDA and Clinical Pharmacology databases.
90.	Bisolvon	58	International product marketed in Mexico and many other countries per Micromedex Tox and Drug Product Results database.
91.	Bisphenol A	56	Name identified in RxNorm database. Unable to find product characteristics in commonly used drug databases. Per Google, "Bisphenol A (BPA) is a chemical produced in large quantities for use primarily in the production of polycarbonate plastics and epoxy resins."
92.	Borate Ion	58	Name identified in RxNorm database. Unable to find product characteristics in commonly used drug databases.
93.	Bornaprine	54	Bornaprine hydrochloride is an international product marketed in Germany, Ireland, Mexico, and other countries per Micromedex Tox and Drug Product Results database.
94.	Breonesin	56	Brand discontinued with no generic equivalents available per Micromedex Redbook database.
95.	Brofed	56	Brand discontinued with no generic equivalents available per Micromedex Redbook database.
96.	Bromaphedrine	46	Bromaphedrine D discontinued with no generic equivalents available per Micromedex Redbook database.
97.	Bromaphen	64	Name identified in RxNorm database. Unable to find product characteristics in commonly used drug databases.
98.	Bromphen Dc	56	Brand discontinued with no generic equivalents available per Micromedex Redbook database.
99.	Bromphen Time	50	Name identified in RxNorm database. Unable to find product characteristics in commonly used drug databases.

No.	Name	POCA Score (%)	Failure preventions
100.	Bromphenex	54	Brands Bromphenex DM and Bromphenex HD discontinued with no generics equivalents available per Micromedex Redbook database.
101.	Bromphenyl	56	Brand discontinued with no generic equivalents available per Micromedex Redbook database.
102.	Bromuphed	57	Brand discontinued with no generic equivalents available per Clinical Pharmacology database.
103.	Butorphic	64	Veterinary product per DailyMed database.
104.	Chlorphedrin	54	Chlorphedrin SR brand discontinued with no generic equivalents available per Micromedex Redbook database.
105.	Chlorphen Hd	56	Name identified in RxNorm database. Unable to find product characteristics in commonly used drug databases.
106.	Chlor-Phenit	58	Name identified in RxNorm database. Unable to find product characteristics in commonly used drug databases.
107.	Clorophene	60	Product is not a drug. It is a chlorinated phenolic antiseptic stated to be active against a wide range of bacteria, fungi, protozoa, and viruses. It is used as a skin disinfectant and for surface and instrument disinfection.
108.	Cophene B	54	Name identified in RxNorm database. Unable to find product characteristics in commonly used drug databases.
109.	Dec Chlorphen	58	Name identified in RxNorm database. Unable to find product characteristics in commonly used drug databases.
110.	Dichlorophen	63	Brand discontinued with no generic equivalents available per Micromedex Redbook database.
111.	Di-Phen	65	Name identified in RxNorm database. Unable to find product characteristics in commonly used drug databases.
112.	Donnaphen	60	Brand discontinued with no generic equivalents available per Micromedex Redbook database.
113.	Durafed	49	Brand discontinued with no generic equivalents available per Micromedex Redbook database.
114.	Duraphen 1000	69	Brand discontinued with no generic equivalents available per Micromedex Redbook database.
115.	Duraphen II	58	Brand discontinued with no generic equivalents available per Micromedex Redbook database.

No.	Name	POCA Score (%)	Failure preventions
116.	Durophet	60	Name identified in RxNorm database. Unable to find product characteristics in commonly used drug databases.
117.	Gamophen	60	Gamophen brand discontinued with no TE codes provided per Drugs@FDA database. It is also identified as an international product marketed in Greece, the United Kingdom, and Australia per Micromedex Tox and Drug Product Results database.
118.	Innohep	43	Brand discontinued with no generic equivalents available per Micromedex Redbook database.
119.	Iophen	68	Brand discontinued with no generic equivalents available per Micromedex Redbook database.
120.	Iophen-C	63	Brand discontinued with no generic equivalents available per Micromedex Redbook database.
121.	Iophen-C Nf	52	Name identified in RxNorm database. Unable to find product characteristics in commonly used drug databases.
122.	Isophen-Df	51	Brand discontinued with no generic equivalents available per Micromedex Redbook database.
123.	Isoprene	50	Isoprene is not a drug. Per Micromedex database, it is the 2-methyl analogue of 1,3-butadiene #2292 and is used in the manufacture of synthetic rubber.
124.	Lipo-Hepin	49	Brand discontinued with no TE codes provided per Drugs@FDA database.
125.	Milophene	62	Brand discontinued with no TE codes provided per Drugs@FDA database.
126.	Miraphen La	58	Brand discontinued with no generic equivalents available per Micromedex Redbook database.
127.	Miraphen Pe	61	Brand discontinued with no generic equivalents available per Clinical Pharmacology database.
128.	Morpholine	58	Name identified in RxNorm database. Unable to find product characteristics in commonly used drug databases. Per Google search, morpholine is an organic chemical compound additive used for pH adjustment in both fossil fuel and nuclear power plant steam systems. In addition, morpholine salicylate is an international product marketed in France, Italy, and Israel per Micromedex Tox and Drug Product Results database.
129.	Muricin	54	Veterinary product per DailyMed database.

No.	Name	POCA Score (%)	Failure preventions
130.	Myophen	68	International product formerly marketed in Thailand and Puerto Rico per Micromedex Tox and Drug Product Results database.
131.	Numorphan	65	Numorphan HCl is discontinued with no generic equivalents available per Micromedex Redbook database.
132.	Orbenin	54	Orbenin-DC is a veterinary product per DailyMed database.
133.	Or-Phen-Ade	57	Brand discontinued with no generic equivalents available per Micromedex Redbook database.
134.	Paraffin	54	Name identified in RxNorm database. Unable to find product characteristics in commonly used drug databases. Per Google search, paraffin is "a flammable, whitish, translucent, waxy solid consisting of a mixture of saturated hydrocarbons, obtained by distillation from petroleum or shale and used in candles, cosmetics, polishes, and sealing and waterproofing compounds."
135.	Phenesin	55	Name identified in RxNorm database. Unable to find product characteristics in commonly used drug databases.
136.	Prophene 65	65	Brand discontinued with no TE codes provided per Drugs@FDA database.
137.	Thiophene	62	International product formerly marketed in France per Micromedex Tox and Drug Product Results database.
138.	Zorprin	64	Brand discontinued with no generic equivalents available per Micromedex Redbook database.

Appendix H: Names not likely to be confused due to absence of attributes that are known to cause name confusion[i].

No.	Name	POCA Score (%)
139.	Ceresin	56
140.	Corisin	56
141.	Diaphine	58

[i] Shah, M, Merchant, L, Chan, I, and Taylor, K. Characteristics That May Help in the Identification of Potentially Confusing Proprietary Drug Names. Therapeutic Innovation & Regulatory Science, September 2016

No.	Name	POCA Score (%)
142.	Diperodon	55
143.	Ditropan	56
144.	Dolophine	55
145.	Doriden	62
146.	Doripenem	58
147.	Dormin	57
148.	Geopen	60
149.	Ibifon 600	56
150.	Ibren	56
151.	Ibuprofen	59
152.	Inotersen	58
153.	Iofen	56
154.	Kao-Spen	56
155.	Lidopen	56
156.	Lipofen	56
157.	Lorsin	56
158.	Midol Teen	55
159.	Migrafen	56
160.	Mipomersen	58
161.	Molypen	55
162.	Myrcene	56
163.	Naropin	59
164.	Neofrin	58
165.	Neopham 6.4%	56
166.	Neophryn	61
167.	Neoprofen	62
168.	Neurotrophin 3	58
169.	Neurotrophin 4	58
170.	Nioxin	56
171.	Norcet	58
172.	Norethin 1/35E-21	56
173.	Norethin 1/35E-28	56
174.	Norethin 1/50 M	56
175.	Norethin 1/50M-21	56
176.	Norethin 1/50M-28	56
177.	Nortemp	58
178.	Paroven	60
179.	Percorten	58
180.	Permapen	55
181.	Pfizerpen	60
182.	Phloretin	60
183.	Phor Pain	64
184.	Pileran	55

No.	Name	POCA Score (%)
185.	Piriton	60
186.	Pitocin	56
187.	Pitressin	57
188.	Prefrin	56
189.	Pre-Pen	60
190.	Prep-Hem	60
191.	Pricortin	58
192.	Pri-Cortin 50	58
193.	Pripsen	59
194.	Prodrin	55
195.	Profen	60
196.	Profeno	57
197.	Pro-Pen-G	56
198.	Protropin	56
199.	Pyopen	61
200.	Q-Profen	55
201.	Riopan	55
202.	Rocephin	56
203.	Tegopen	56
204.	Temopen	56
205.	Tenormin	56
206.	Terocin	58
207.	Torecan	55
208.	Versapen	55
209.	Vetripen	56
210.	Vicoprofen	59
211.	Vidopen	62

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