CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

212122Orig1s000

OTHER REVIEW(S)

FOOD AND DRUG ADMINISTRATION
Center for Drug Evaluation and Research
Office of Prescription Drug Promotion

****Pre-decisional Agency Information****

Memorandum

Date: July 1, 2020

To: Linda Ebonine, PA-C
Regulatory Project Manager
Division of Pulmonology, Allergy, & Critical Care (DPACC)

From: Taylor Burnett, Pharm.D. RAC
Regulatory Review Officer
Office of Prescription Drug Promotion (OPDP)

CC: Kathleen Klemm, Pharm.D., RAC
Team Leader
OPDP

Subject: OPDP Labeling Comments for BREZTRI™ AEROSPHERE® (budesonide, glycopyrrolate, and formoterol fumarate) inhalation aerosol, for oral inhalation use

NDA: 212122

In response to DPACC's consult request dated June 22, 2020, OPDP has reviewed the proposed product labeling (PI), patient package insert (PPI), Instructions for Use (IFU), and carton and container labeling for the original NDA submission for BREZTRI™ AEROSPHERE® (budesonide, glycopyrrolate, and formoterol fumarate) inhalation aerosol, for oral inhalation use (Breztri).

PI: OPDP's comments on the proposed labeling are based on the draft PI received by electronic mail from DPACC (Linda Ebonine) on June 18, 2020, and are provided below.

PPI/IFU: A combined OPDP and Division of Medical Policy Programs (DMPP) review was completed, and comments on the proposed PPI/IFU were sent under separate cover on June 26, 2020.

Carton and Container Labeling: OPDP has reviewed the attached proposed carton and container labeling submitted by the Sponsor to the electronic document room on January 23, 2020, and we do not have any comments.

Thank you for your consult. If you have any questions, please contact Taylor Burnett at (240) 402-1349 or Taylor.Burnett@fda.hhs.gov

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/s/

TAYLOR B BURNETT
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Department of Health and Human Services
Public Health Service
Food and Drug Administration
Center for Drug Evaluation and Research
Office of Medical Policy

PATIENT LABELING REVIEW

Date:	June 26, 2020
To:	Linda Ebonine, PA-C Regulatory Project Manager **Division of Pulmonary, Allergy, and Critical Care (DPACC)**
Through:	LaShawn Griffiths, MSHS-PH, BSN, RN Associate Director for Patient Labeling **Division of Medical Policy Programs (DMPP)**
From:	Sharon W. Williams, MSN, BSN, RN Patient Labeling Reviewer **Division of Medical Policy Programs (DMPP)** Taylor Burnett, Pharm.D., RAC Regulatory Review Officer **Office of Prescription Drug Promotion (OPDP)**
Subject:	Review of Patient Labeling: Patient Package Insert (PPI) and Instructions for Use (IFU)
Drug Name (established name):	BREZTRI AEROSPHERE (budesonide, glycopyrrolate, and formoterol fumarate)
Dosage Form and Route:	inhalation aerosol, for oral inhalation use
Application Type/Number:	NDA 212122
Applicant:	AstraZeneca Pharmaceuticals LP (AstraZeneca)

1 INTRODUCTION

On November 30, 2018, AstraZeneca submitted for the Agency's review a New Drug Application (NDA) 212122 for BREZTRI AEROSPHERE (budesonide, glycopyrrolate, and formoterol fumarate) inhalation aerosol, for oral inhalation use. On September 30, 2019, the agency issued a Complete Response Letter (CRL) outlining the deficiencies regarding efficacy and safety of the single pivotal study submitted to the NDA. On January 23, 2020, the sponsor resubmitted the application for NDA 212122 based on the outcomes of studies that demonstrated safety and efficacy of BREZTRI AEROSPHERE for the maintenance treatment of patients with chronic obstructive pulmonary disease (COPD).

This collaborative review is written by the Division of Medical Policy Programs (DMPP) and the Office of Prescription Drug Promotion (OPDP) in response to a request by the Division of Pulmonary, Allergy, and Critical Care (DPACC) on June 18, 2020 and June 22, 2020 for DMPP and OPDP respectively to review the Applicant's proposed Patient Package Insert (PPI) and Instructions for Use (IFU) for BREZTRI AEROSPHERE (budesonide, glycopyrrolate, and formoterol fumarate) inhalation aerosol, for oral inhalation use.

2 MATERIAL REVIEWED

- Draft BREZTRI AEROSPHERE (budesonide, glycopyrrolate, and formoterol fumarate) inhalation aerosol, for oral inhalation use PPI and IFU received on January 23, 2020 and received by DMPP and OPDP on June 18, 2020.
- Draft BREZTRI AEROSPHERE (budesonide, glycopyrrolate, and formoterol fumarate) inhalation aerosol, for oral inhalation use Prescribing Information (PI) received on January 23, 2020, revised by the Review Division throughout the review cycle, and received by DMPP and OPDP on June 18, 2020.
- Approved SYMBICORT (budesonide, formoterol fumarate dihydrate) inhalation aerosol, for oral inhalation use comparator labeling dated December 20, 2017.
- Approved UTIBRON (indacaterol and glycopyrrolate) inhalation powder, for oral inhalation use comparator labeling dated May 29, 2019.
- Approved TRELEGY (fluticasone furoate, umeclidinium, and vilanterol inhalation powder), for oral inhalation use comparator labeling dated May 15, 2019.

3 REVIEW METHODS

To enhance patient comprehension, materials should be written at a 6th to 8th grade reading level, and have a reading ease score of at least 60%. A reading ease score of 60% corresponds to an 8th grade reading level.

Additionally, in 2008 the American Society of Consultant Pharmacists Foundation (ASCP) in collaboration with the American Foundation for the Blind (AFB) published *Guidelines for Prescription Labeling and Consumer Medication Information for People with Vision Loss*. The ASCP and AFB recommended using

fonts such as Verdana, Arial or APHont to make medical information more accessible for patients with vision loss.

In our review of the PPI and IFU we:

- simplified wording and clarified concepts where possible
- ensured that the PPI and IFU are consistent with the Prescribing Information (PI)
- removed unnecessary or redundant information
- ensured that the PPI and IFU are free of promotional language or suggested revisions to ensure that it is free of promotional language
- ensured that the PPI and IFU meet the criteria as specified in FDA's Guidance for Useful Written Consumer Medication Information (published July 2006)

4 CONCLUSIONS

The PPI and IFU are acceptable with our recommended changes.

5 RECOMMENDATIONS

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

Please let us know if you have any questions.

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/s/

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