

**CENTER FOR DRUG EVALUATION AND
RESEARCH**

APPLICATION NUMBER:

213498Orig1s000

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 20, 2020
Application Type and Number:	NDA 213498
Product Name and Strength:	Ponvory (ponesimod) tablet, 2 mg, 3 mg, 4 mg, 5 mg, 6 mg, 7 mg, 8 mg, 9 mg, 10 mg, 20 mg
Product Type:	Single Ingredient Product
Rx or OTC:	Prescription (Rx)
Applicant/Sponsor Name:	Janssen Pharmaceuticals, Inc. (Janssen)
Panorama #:	2020-40739981
DMEPA Safety Evaluator:	Chad Morris, PharmD, MPH
DMEPA Team Leader:	Briana Rider, PharmD, CPPS

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1 INTRODUCTION

This review evaluates the proposed proprietary name, Ponvory, 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. Janssen included a proprietary name assessment report in the submission for this proposed proprietary name.

1.1 REGULATORY HISTORY

Actelion Pharmaceuticals Ltd. previously submitted the proposed proprietary name, (b) (4) *** on March 14, 2019. However, we found the name, (b) (4) *** unacceptable due to similarity in spelling and pronunciation and overlapping product characteristics with the proprietary name, (b) (4) under IND 101722 on September 3, 2019.^a

Janssen previously submitted the name, (b) (4) ***, for review under NDA 213498 on March 18, 2020. However, on April 09, 2020 we found the name (b) (4) *** unacceptable as it would misbrand the proposed product.^b

Thus, Janssen submitted the name, Ponvory, for review on June 18, 2020.

1.2 PRODUCT INFORMATION

The following product information is provided in the proprietary name submission received on June 18, 2020.

- Intended Pronunciation: pon-VOR-ee
- Active Ingredient: ponesimod
- Indication of Use: treatment of relapsing forms of multiple sclerosis (MS), to include clinically isolated syndrome, relapsing-remitting disease, and active secondary progressive disease, in adults
- Route of Administration: oral
- Dosage Form: tablet
- Strength: 2 mg, 3 mg, 4 mg, 5 mg, 6 mg, 7 mg, 8 mg, 9 mg, 10 mg, 20 mg
- Dose and Frequency:
 - o Titration Initiation:

^a Little, C. Proprietary Name Review for (b) (4) *** (IND 101722). Silver Spring (MD): FDA, CDER, OSE, DMEPA (US); 2019 SEP 03. Panorama No. 2019-30035247.

^b Morris, C. Proprietary Name Review for (b) (4) *** (NDA 213498). Silver Spring (MD): FDA, CDER, OSE, DMEPA (US); 2020 APR 09. Panorama No. 2020-38562403.

Titration Day	Daily Dose
Day 1 and 2	2 mg
Day 3 and 4	3 mg
Day 5 and 6	4 mg
Day 7	5 mg
Day 8	6 mg
Day 9	7 mg
Day 10	8 mg
Day 11	9 mg
Day 12, 13 and 14	10 mg

- o Maintenance Dose: 20 mg daily
- How Supplied:
 - o Starter Pack containing 14 tablets (2x2 mg, 2x3 mg, 2x4 mg, 1x5 mg, 1x6 mg, 1x7 mg, 1x8 mg, 1x9 mg, 3x10 mg)
 - o Bottle containing #30: 20 mg tablets
- Storage:
 - o Starter Pack: Store at 20°C to 25°C (68°F to 77°F); excursions permitted from 15°C to 30°C (59°F to 86°F) [see USP Controlled Room Temperature]. Store in the original package.
 - o Bottle: Store at 20°C to 25°C (68°F to 77°F); excursions permitted from 15°C to 30°C (59°F to 86°F) [see USP Controlled Room Temperature]. Store in the original package. Do not discard desiccant. Protect from moisture.

2 RESULTS

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

2.1 MISBRANDING ASSESSMENT

The Office of Prescription Drug Promotion (OPDP) determined that Ponvory would not misbrand the proposed product. The Division of Medication Error Prevention and Analysis (DMEPA) and the Division of Neurology 2 (DN 2) concurred with the findings of OPDP's assessment for Ponvory.

2.2 SAFETY ASSESSMENT

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

2.2.1 United States Adopted Names (USAN) Search

There is no USAN stem present in the proposed proprietary name^c.

^c USAN stem search conducted on July 14, 2020.

2.2.2 Components of the Proposed Proprietary Name

Janssen did not provide a derivation or intended meaning for the proposed proprietary name, Ponvory, in their submission. We note the proposed name Ponvory begins with the letter string ‘Po-’ which is an abbreviation for the direction ‘by mouth’ that may be used on a prescription. We note the product is a tablet given by mouth; therefore, it is unlikely that this could lead to any confusion or errors. Beyond this abbreviation, we note that Ponvory that does not contain any additional components (i.e. a modifier, route of administration, dosage form, etc.) that are misleading or can contribute to medication error.

2.2.3 Comments from Other Review Disciplines at Initial Review

In response to the OSE, July 10, 2020 e-mail, the Division of Neurology 2 (DN 2) did not forward any comments or concerns relating to Ponvory at the initial phase of the review.

2.2.4 FDA Name Simulation Studies

Eighty-four practitioners participated in DMEPA’s prescription studies for Ponvory. 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 prescription simulation studies.

2.2.5 Phonetic and Orthographic Computer Analysis (POCA) Search Results

Our POCA search^d identified 46 names with a combined phonetic and orthographic score of $\geq 55\%$ or an individual phonetic or orthographic score $\geq 70\%$. 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 and the applicant’s proprietary name assessment report. 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 $\geq 70\%$	1
Moderately similar name pair: combined match percentage score $\geq 55\%$ to $\leq 69\%$	45
Low similarity name pair: combined match percentage score $\leq 54\%$	1

^d POCA search conducted on July 14, 2020 in version 4.3.

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

Our analysis of the 47 names contained in Table 1 determined none of the names will pose a risk for confusion with Ponvory 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 Neurology 2 (DN 2) via e-mail on August 5, 2020. At that time, we also requested additional information or concerns that could inform our review. Per e-mail correspondence from the Division of Neurology 2 (DN 2) on August 18, 2020, they stated no additional concerns with the proposed proprietary name, Ponvory.

3 CONCLUSION

The proposed proprietary name, Ponvory, is acceptable.

If you have any questions or need clarifications, please contact Monique Killen, OSE project manager, at 240-402-1985.

3.1 COMMENTS TO JANSSEN PHARMACEUTICALS, INC.

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

If any of the proposed product characteristics as stated in your submission, received on June 18, 2020, 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.^e

^e 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 $\geq 70\%$.
 - Moderately similar pair: combined match percentage score $\geq 55\%$ to $\leq 69\%$.
 - Low similarity: combined match percentage score $\leq 54\%$.

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^f. 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 a low similarity name to the moderate similarity category and review according to the moderately similar name pair checklist.

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

- c. FDA Prescription Simulation Studies: DMEPA staff also conducts a prescription simulation studies using FDA health care professionals.

Four 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, verbal pronunciation of the drug name or during computerized provider order entry. 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 vulnerability of the proposed name to be misinterpreted by healthcare practitioners during written, verbal, or electronic prescribing.

In order to evaluate the potential for misinterpretation of the proposed proprietary name during written, verbal, or electronic prescribing of the name, written inpatient medication orders, written outpatient prescriptions, verbal orders, and electronic orders are simulated, each consisting of a combination of marketed and unapproved drug products, including the proposed name.

- 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 $\geq 70\%$).

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.			
<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 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 $\geq 55\%$ to $\leq 69\%$).

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 <u>with</u> overlapping or similar strengths or doses.

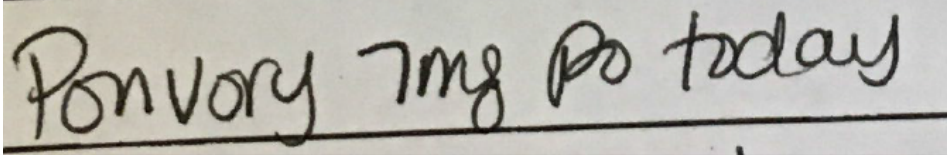
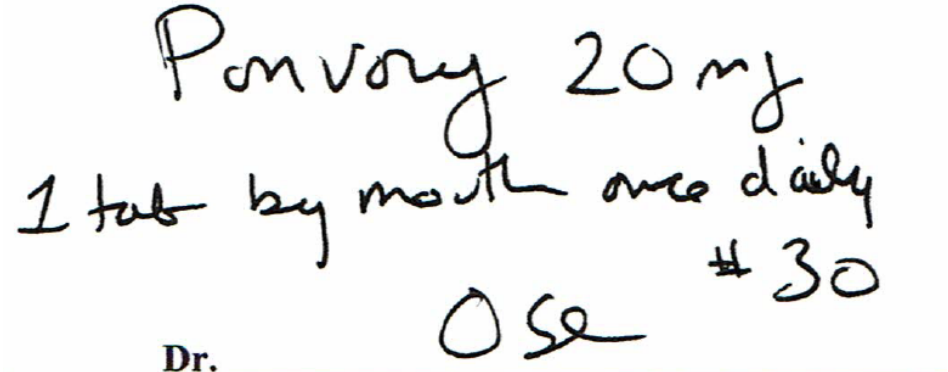
	Orthographic Checklist (Y/N to each question) - Do the names begin with different first letters? Note that even when names begin with different first letters, certain letters may be confused with each other when scripted. - Are the lengths of the names dissimilar* when scripted? *FDA considers the length 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 as vowel reduction, assimilation, or deletion? - Across a range of dialects, are the names consistently pronounced differently?
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Table 5: Low Similarity Name Pair Checklist (i.e., combined score is $\leq 54\%$).

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. Ponvory Study (Conducted on June 26, 2020)

Handwritten Medication Order/Prescription	Verbal Prescription
<u>Medication Order:</u>  <u>Outpatient Prescription:</u> 	Ponvory 20 mg 1 tab by mouth once daily #30
CPOE Study Sample (displayed as sans-serif, 12-point, bold font)	
Ponvory	

FDA Prescription Simulation Responses (Aggregate Report)

Study Name: Ponvory

As of Date 7/14/2020

207 People Received Study
84 People Responded

Study Name: Ponvory

	Total	17	23	15	29	
INTERPRETATION	OUTPATIENT	CPOE	VOICE	INPATIENT	TOTAL	
CONVORY	0	0	1	0	1	
PODVORI	0	0	1	0	1	
PONGORI	0	0	1	0	1	
PONVOORY	0	0	0	1	1	
PONVOREY	0	0	1	0	1	
PONVORI	0	0	8	0	8	
PONVORY	16	23	3	27	69	
PONVORY 7 MG	0	0	0	1	1	
PONVOY	1	0	0	0	1	

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

No.	Proposed name: Ponvory Established name: ponesimod Dosage form: tablet Strength(s): 2 mg, 3 mg, 4 mg, 5 mg, 6 mg, 7 mg, 8 mg, 9 mg, 10 mg, 20 mg Usual Dose: 2 mg to 10 mg or 20 mg once daily	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.	Ponvory	100	Subject of this review.

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

No.	Name	POCA Score (%)
N/A		

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

No.	Proposed name: Ponvory Established name: ponesimod Dosage form: tablet Strength(s): 2 mg, 3 mg, 4 mg, 5 mg, 6 mg, 7 mg, 8 mg, 9 mg, 10 mg, 20 mg Usual Dose: 2 mg to 10 mg or 20 mg once daily	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
2.	(b) (4)	62	This name pair has sufficient orthographic and phonetic differences. Orthographically, the prefixes (Po- vs Ph-) and suffixes (-ory vs -dry) provide some differentiation. In both instances, Phendry contains upstroke letters (that is, h and d, respectively), whereas Ponvory does not contain any upstroke letters. Phonetically, the first syllables (pon vs. phen) and second syllables (VOR vs dry) sound sufficiently different. Additionally, Ponvory contains an extra syllable.
3.	(b) (4) ***	62	This name pair has sufficient

No.	Proposed name: Ponvory Established name: ponesimod Dosage form: tablet Strength(s): 2 mg, 3 mg, 4 mg, 5 mg, 6 mg, 7 mg, 8 mg, 9 mg, 10 mg, 20 mg Usual Dose: 2 mg to 10 mg or 20 mg once daily	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
			orthographic and phonetic differences.
4.	Provera	61	This name pair has sufficient orthographic and phonetic differences.
5.	Pronto Spray	57	This name pair has sufficient orthographic and phonetic differences.
6.	Pronto	56	This name pair has sufficient orthographic and phonetic differences.
7.	Khapzory	56	This name pair has sufficient orthographic and phonetic differences.
8.	Conray	56	This name pair has sufficient orthographic and phonetic differences. Orthographically, the names begin with different first letters (P- vs C-), which look different when scripted. Phonetically, the second syllables (vor vs ray) sound different. Additionally, Ponvory contains an extra syllable. Additionally, there is no direct overlap in strength (2 mg, 3 mg, 4 mg, 5 mg, 6 mg, 7 mg, 8 mg, 9 mg, 10 mg, 20 mg vs 60% or 282 mg/mL), dosage form (tablet vs. injection), and route of administration (oral vs. intravenous push or infusion), and frequency of administration (daily vs one-time), which may provide additional differentiation if included.
9.	Conray 43	56	See Prevention of Failure Mode for root name Conray. Additionally, Conray 43 contains the numeric modifier, 43, which, if included on a prescription will provide further differentiation.
10.	(b) (4) ***	55	This name pair has sufficient

No.	Proposed name: Ponvory Established name: ponesimod Dosage form: tablet Strength(s): 2 mg, 3 mg, 4 mg, 5 mg, 6 mg, 7 mg, 8 mg, 9 mg, 10 mg, 20 mg Usual Dose: 2 mg to 10 mg or 20 mg once daily	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.	Genvoya	55	orthographic and phonetic differences. This name pair has sufficient orthographic and phonetic differences.

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

No.	Name	POCA Score (%)
12.	Pavulon	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
13.	(b) (4)	66	Proposed proprietary name for ANDA 204209/S-006 found unacceptable by DMEPA (2017-20923184, dated 03/14/2018). ANDA 204209/S-006 was approved under the proprietary name Dvorah.
14.	(b) (4) ***	65	This is an alternate proposed proprietary name for ANDA 204209/S-006, and ANDA 204209/S-006 was approved under the proprietary name Dvorah.
15.	Prondol	63	International product formerly marketed in the United Kingdom and Ireland.
16.	(b) (4) ***	62	Proposed proprietary name for IND (b) (4) found unacceptable by DMEPA (OSE# (b) (4) dated 08/12/2016). (b) (4) *** found conditionally acceptable for this IND (inactive as of 04/10/2018).

No.	Name	POCA Score (%)	Failure preventions
17.	(b) (4)	62	According the March 27, 2014 Federal Register Notice, (b) (4) to comply with FDA's request that sponsors voluntarily withdraw applications for fixed-combination prescription products containing (b) (4).
18.	Ponazuril	62	Veterinary product.
19.	(b) (4) ***	60	Proposed proprietary name for NDA 213498 found unacceptable by DMEPA (OSE# 2020-38562403). The proposed proprietary name, Ponvory, has been submitted for NDA 213498, and is the name currently under evaluation in this review.
20.	Pevaryl	58	International product marketed in several countries outside of the US.
21.	(b) (4) ***	58	Proposed proprietary name for IND 101722 found unacceptable by DMEPA (OSE# 2019-30035247). The proposed proprietary name, Ponvory, has been submitted for IND 101722 under NDA 213498, and is the name currently under evaluation in this review.
22.	Pronol	57	Name identified in RxNorm database. Unable to find product characteristics in commonly used drug databases.
23.	Condryn	56	Name identified in RxNorm database. Unable to find product characteristics in commonly used drug databases.
24.	Conray 280	56	Name identified in RxNorm database. Unable to find product characteristics in commonly used drug databases.
25.	Conray 30	56	Brand discontinued with no generic equivalents available. NDA 016983 withdrawn FR effective 08/02/19.
26.	Conray 325	56	Brand discontinued with no generic equivalents available. NDA 017685 withdrawn FR effective 03/13/09.
27.	Conray 400	56	Brand discontinued with no generic equivalents available. NDA 014295 withdrawn FR effective 07/21/17.

No.	Name	POCA Score (%)	Failure preventions
28.	Panasorb	56	Name identified in RxNorm database. Unable to find product characteristics in commonly used drug databases.
29.	(b) (4)	56	According the March 27, 2014 Federal Register Notice, (b) (4) to comply with FDA's request that sponsors voluntarily withdraw applications for fixed-combination prescription products containing (b) (4)
30.	Ponderax	56	International product formerly marketed in United Kingdom, Australia, Austria, Germany, Ireland, and South Africa.
31.	(b) (4) ***	56	Proposed proprietary name for (b) (4) found unacceptable by CBER on March 18, 2020. IND is active, and the proposed name (b) (4) *** was submitted for review on 6/9/2020.
32.	(b) (4) ***	55	Proposed proprietary name for IND (b) (4) withdrawn by the Applicant. The status of IND (b) (4) is withdrawn, effective 06/09/2020.

Appendix H: Names not likely to be confused due to absence of attributes that are known to cause name confusion^{8Fg}.

No.	Name	POCA Score (%)
33.	(b) (4) ***	62
34.	Men-Phor	60
35.	(b) (4) ***	60
36.	Monodur	59
37.	(b) (4) ***	58
38.	Soneryl	58
39.	Fentora	57
40.	(b) (4) ***	56
41.	(b) (4) ***	56

^g 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 (%)
42.	Monocor	56
43.	Onsior	56
44.	Camphor	55
45.	(b) (4) ***	55
46.	Monaspor	55
47.	Sonorx	55

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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:	April 9, 2020
Application Type and Number:	NDA 213498
Product Name and Strength:	(b) (4) (ponesimod) tablet, 2 mg, 3 mg, 4 mg, 5 mg, 6 mg, 7 mg, 8 mg, 9 mg, 10 mg, 20 mg
Product Type:	Single Ingredient Product
Rx or OTC:	Prescription (Rx)
Applicant/Sponsor Name:	Janssen Pharmaceuticals, Inc. (Janssen)
Panorama #:	2020-38562403
DMEPA Safety Evaluator:	Chad Morris, PharmD, MPH
DMEPA Team Leader:	Briana Rider, PharmD, CPPS

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