CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

210526Orig1s000

PROPRIETARY NAME REVIEW(S)

PROPRIETARY NAME MEMORANDUM

Division of Medication Error Prevention and Analysis 1 (DMEPA 1)
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:	July 30, 2021
Application Type and Number:	NDA 210526
Product Name and Strength:	Dyanavel XR (amphetamine) extended-release tablets, 5 mg, 10 mg, 15 mg, and 20 mg
Product Type:	Single Ingredient Product
Rx or OTC:	Prescription (Rx)
Applicant/Sponsor Name:	Tris Pharma, Inc. (Tris)
PNR ID #:	2021-1044723965
DMEPA 1 Safety Evaluator:	Loretta Holmes, BSN, PharmD
DMEPA 1 Team Leader:	Sevan Kolejian, PharmD, MBA, BCPPS
DMEPA 1 Director:	Irene Z. Chan, PharmD, BCPS

1 INTRODUCTION

This memorandum is to reassess the proposed proprietary name, Dyanavel XR, which was found conditionally acceptable under NDA 210526 on October 19, 2020.[a] A Complete Response Letter (CRL) was issued for NDA 210526 on January 21, 2021. Subsequently, Tris resubmitted the name, Dyanavel XR, on May 4, 2021 upon resubmission of NDA 210526 in response to the CRL. We note that all product characteristics remain the same.

2 METHODS AND DISCUSSION

2.1 MISBRANDING ASSESSMENT

The Office of Prescription Drug Promotion (OPDP) determined that Dyanavel XR would not misbrand the proposed product. The Division of Medication Error Prevention and Analysis 1 (DMEPA 1) and the Division of Psychiatry (DP) concurred with the findings of OPDP's assessment for Dyanavel XR.

2.2 SAFETY ASSESSMENT

For re-assessment of the proposed proprietary name, we considered our previous safety assessment of the name and continue to have no safety concerns with Tris' proposal to market the proposed tablets under the proprietary name, Dyanavel XR.

2.3 COMMUNICATION OF DMEPA'S ANALYSIS AT MIDPOINT OF REVIEW

We communicated our findings to the Division of Psychiatry (DP). At that time, we also requested additional information or concerns that could inform our review. On July 30, 2021, the Division of Psychiatry (DP) stated no additional concerns with the proposed proprietary name, Dyanavel XR.

3 CONCLUSION

Our re-assessment did not identify any names that represent a potential source of drug name confusion. Therefore, we maintain that the proposed proprietary name, Dyanavel XR, is acceptable.

If you have any questions or need clarifications, please contact Phuong B. Nguyen, OSE Project Manager, at 240-402-5827.

3.1 COMMENTS TO TRIS PHARMA, INC.

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

If any of the proposed product characteristics as stated in your submission, received on May 4, 2021, are altered prior to approval of the marketing application, the name must be resubmitted for review.

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[a] Holmes, L. Proprietary Name Review for Dyanavel XR (NDA 210526). Silver Spring (MD): FDA, CDER, OSE, DMEPA (US); 2020 Oct 19. PNR ID No. 2020-42061873.

This is a representation of an electronic record that was signed electronically. Following this are manifestations of any and all electronic signatures for this electronic record.

/s/

LORETTA HOLMES
07/30/2021 11:11:45 AM

SEVAN H KOLEJIAN
07/30/2021 11:14:19 AM

IRENE Z CHAN
08/02/2021 08:24:06 AM

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:	October 19, 2020
Application Type and Number:	NDA 210526
Product Name and Strength:	Dyanavel XR (amphetamine) extended-release tablets, 5 mg, 10 mg, 15 mg, and 20 mg
Product Type:	Single Ingredient Product
Rx or OTC:	Prescription (Rx)
Applicant/Sponsor Name:	Emory Partners, LLC (Emory)
Panorama #:	2020-42061873
DMEPA Safety Evaluator:	Loretta Holmes, BSN, PharmD
DMEPA Team Leader:	Sevan Kolejian, PharmD, MBS, BCPPS

Contents

1 INTRODUCTION

This review re-evaluates the proposed proprietary name, Dyanavel XR, 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. Emory did not submit an external name study for this proposed proprietary name.

1.1 REGULATORY HISTORY

Dyanavel XR (amphetamine) extended-release oral suspension 2.5 mg/mL was approved on October 19, 2015 under NDA 208147 and is a currently marketed product. Tris Pharma (Tris) submitted NDA 210526 for amphetamine extended-release tablets on September 25, 2017. Tris proposed to market the amphetamine extended-release tablet formulation under the Dyanavel XR proprietary name as an expansion of the Dyanavel XR product line. We reviewed the name Dyanavel XR for the proposed amphetamine extended-release tablet formulation under NDA 210526 in OSE Review #2018-20331524 and found the name conditionally acceptable.[a]

On July 25, 2018, a Complete Response (CR) Letter was issued for NDA 210526 due to facility inspection and regulatory deficiencies. On July 22, 2020, Emory (NDA ownership was transferred to Emory) submitted a complete response to the deficiencies included in the CR Letter and resubmitted the name, Dyanavel XR, for review. We note that the indication of use has been expanded to include adults, but other product characteristics remain the same.

1.2 PRODUCT INFORMATION

The following product information is provided in the proprietary name submission received on July 22, 2020.

Product Characteristic	Dyanavel XR extended-release tablets (proposed)	Dyanavel XR extended-release oral suspension
Intended Pronunciation	dī-an-uh-vel XR	dī-an-uh-vel XR
Active ingredient	amphetamine	amphetamine
Indication of Use	Treatment of Attention Deficit Hyperactivity Disorder (ADHD) in patients 6 years and older	Treatment of Attention Deficit Hyperactivity Disorder (ADHD) in patients 6 years and older
Route of Administration	Oral	Oral
Dosage Form	Extended-release tablets	Extended-release oral suspension
Strength(s)	5 mg (functionally scored), 10 mg, 15 mg, and 20 mg	2.5 mg/mL

[a] Holmes, L. Proprietary Name Review for Dyanavel XR (NDA 210526). Silver Spring (MD): FDA, CDER, OSE, DMEPA (US); 2018 Apr 13. Panorama No. 2018-20331524.

Dose and Frequency	In patients 6 years and older, start with 2.5 mg or 5 mg once daily in the morning. The dose may be increased in increments of 2.5 mg to 10 mg per day every 4 to 7 days up to a maximum dose of 20 mg per day. The 5 mg extended-release tablet is functionally scored and may be divided into equal halves for dose adjustments.	In patients 6 years and older, start with 2.5 mg or 5 mg once daily in the morning. The dose may be increased in increments of 2.5 mg to 10 mg per day every 4 to 7 days up to a maximum dose of 20 mg per day. The 5 mg extended-release tablet is functionally scored and may be divided into equal halves for dose adjustments.
How Supplied	Bottles containing 30 tablets	Cartons: Each containing a bottle of 464 mL, four oral dispensers, and four bottle adapters
Storage	Store at 20° to 25°C (68° to 77°F); excursions permitted from 15º to 30ºC (59º to 86ºF)	Store at 20° to 25°C (68° to 77°F); excursions permitted from 15º to 30ºC (59º to 86ºF)

2 RESULTS

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

2.1 MISBRANDING ASSESSMENT

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

2.2 SAFETY ASSESSMENT

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

2.2.1 United States Adopted Names (USAN) Search

There is no USAN stem present in the proposed proprietary name[b].

2.2.2 Components of the Proposed Proprietary Name

Emory indicated in their submission that: "*The brand name Dyanavel XR has been previously approved for a related product owned by Tris Pharma, Inc. (Tris), amphetamine extended-release oral suspension and the proposed product Amphetamine ER tablets is a line extension of the oral suspension. Both the products, amphetamine extended-release oral suspension and tablets will be manufactured and distributed by Tris. Patients taking Dyanavel XR extended-release oral suspension may be switched to Dyanavel XR extended-release tablets at the equivalent daily dose and the insert labeling is intended to be shared for both products.*"

[b] USAN stem search conducted on September 21, 2020.

The proprietary name, Dyanavel XR, is comprised of the root name "Dyanavel" and a modifier "XR". Per Emory, "*the XR suffix is intended to connote "extended-release". The extended-release properties of the drug product have been demonstrated in a comparative bioavailability study to an equivalent 20 mg dose of the reference product, Dyanavel XR extended-release oral suspension conducted under the IND 129044 and submitted in the original NDA under NDA 210526 (Study 2016-4171)."*

2.2.3 Comments from Other Review Disciplines at Initial Review

In response to the OSE, August 26, 2020 e-mail, the Division of Psychiatry (DP) did not forward any comments or concerns relating to Dyanavel XR at the initial phase of the review.

2.2.4 Safety Assessment of the Proposed Name Dyanavel XR

Dyanavel XR extended-release oral suspension is currently marketed in a 2.5 mg/mL strength under NDA 208147. In our previous proprietary name review of Dyanavel XR for the extended-release tablets proposed under NDA 210526[c], we considered the appropriateness of using the same proprietary name, Dyanavel XR, for the extended-release tablets. We determined that it is appropriate to use the name Dyanavel XR for the proposed extended-release tablet formulation and we continue to maintain our position (we refer to OSE Review #2018-20331524, dated April 13, 2018).

Emory indicated that *"patients taking Dyanavel XR extended-release oral suspension may be switched to Dyanavel XR extended-release tablets at the equivalent daily dose and the insert labeling is intended to be shared for both products."* Provided that the review team confirms that these products can be substituted on a mg per mg basis and have no clinically significant differences, we do not anticipate this brand name extension will introduce medication errors related to switching between these dosage forms.

Additionally, we do not have any medication error related concerns regarding the expansion of the indication of use to include adults since this does not impact orthographic/phonetic similarity or the product dosing and formulation.

Therefore, based on the totality of the information considered above, we have no safety concerns with the proposal to market the proposed tablets with the proprietary name, Dyanavel XR.

2.2.5 Communication of DMEPA's Analysis at Midpoint of Review

DMEPA communicated our findings to the Division of Psychiatry (DP) via e-mail on October 16, 2020. At that time we also requested additional information or concerns that could inform our review. Per e-mail correspondence from the Division of Psychiatry (DP) on October 19, 2020, they stated no additional concerns with the proposed proprietary name, Dyanavel XR.

3 CONCLUSION

The proposed proprietary name, Dyanavel XR, is acceptable.

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[c] Holmes, L. Proprietary Name Review for Dyanavel XR (NDA 210526). Silver Spring (MD): FDA, CDER, OSE, DMEPA (US); 2018 Apr 13. Panorama No. 2018-20331524.

If you have any questions or need clarifications, please contact Phuong B. Nguyen, OSE Project Manager, at 240-402-5827.

3.1 COMMENTS TO EMORY PARTNERS, LLC

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

If any of the proposed product characteristics as stated in your submission, received on July 22, 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.

APPEARS THIS WAY ON ORIGINAL

This is a representation of an electronic record that was signed electronically. Following this are manifestations of any and all electronic signatures for this electronic record.

/s/

LORETTA HOLMES
10/19/2020 03:42:06 PM

SEVAN H KOLEJIAN
10/19/2020 03:57:36 PM

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 13, 2018
Application Type and Number:	NDA 210526
Product Name and Strength:	Dyanavel XR (amphetamine) Extended-Release tablets 5 mg, 10 mg, 15 mg, and 20 mg
Product Type:	Single Ingredient Product
Rx or OTC:	Rx
Applicant/Sponsor Name:	Tris Pharma, Inc.
Panorama #:	2018-20331524
DMEPA Safety Evaluator:	Loretta Holmes, BSN, PharmD
DMEPA Team Leader:	Lolita White, PharmD

Contents

1 INTRODUCTION

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

1.1 REGULATORY HISTORY

The proposed proprietary name, Dyanavel XR, was found acceptable in OSE Review #2014-46334, dated March 11, 2015 for the extended-release oral suspension formulation. Dyanavel XR extended-release oral suspension (NDA 208147) was approved on October 19, 2015.

On January 16, 2018, Tris Pharma submitted the name, Dyanavel XR, for review for their proposed amphetamine extended-release tablet formulation, NDA 210526.

1.2 PRODUCT INFORMATION

Product Characteristic	Dyanavel XR extended-release tablets (proposed)	Dyanavel XR extended-release oral suspension (approved on 10/19/2015)
Intended Pronunciation	dī-an-uh-vel XR	dī-an-uh-vel XR
Active ingredient	amphetamine	amphetamine
Indication of Use	Treatment of Attention Deficit Hyperactivity Disorder (ADHD)	Treatment of Attention Deficit Hyperactivity Disorder (ADHD)
Route of Administration	Oral	Oral
Dosage Form	extended-release tablets	extended-release oral suspension
Strength(s)	5 mg (scored), 10 mg, 15 mg, and 20 mg	2.5 mg/mL
Dose and Frequency	In children 6 years of age and older, start with 2.5 mg or 5 mg once daily in the morning. The dose may be increased in increments of 2.5 mg to 10 mg per day every 4 to 7 days up to a maximum dose of 20 mg per day. The 5 mg extended-release tablet is functionally scored and may be divided into equal halves for dose adjustments. The tablets may be chewed or swallowed whole.	In children 6 years of age and older, start with 2.5 mg or 5 mg once daily in the morning. The dose may be increased in increments of 2.5 mg to 10 mg per day every 4 to 7 days up to a maximum dose of 20 mg per day.
How Supplied	30-count bottle	Bottle containing 464 mL

Storage	Store at 20° to 25°C (68° to 77°F); excursions permitted from 15º to 30ºC (59º to 86ºF)	Store at 20° to 25°C (68° to 77°F); excursions permitted from 15º to 30ºC (59º to 86ºF)

2 RESULTS

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

2.1 MISBRANDING ASSESSMENT

The Office of Prescription Drug Promotion (OPDP) determined that the proposed name would not misbrand the proposed product. The Division of Medication Error Prevention and Analysis (DMEPA) and the Division of Psychiatry Products (DPP) concurred with the findings of OPDP's assessment of the proposed name.

2.2 SAFETY ASSESSMENT

The following aspects were considered in the safety evaluation of the name.

2.2.1 United States Adopted Names (USAN) Search

There is no USAN stem present in the proprietary name[a].

2.2.2 Components of the Proposed Proprietary Name

Tris Pharma indicated in their submission that: *"The brand name Dyanavel XR has been previously approved for a related product amphetamine extended-release oral suspension and the proposed product Amphetamine ER tablets is a line extension of the oral suspension. Patients taking Dyanavel XR extended-release oral suspension may be switched to Dyanavel XR extended-release tablets at the equivalent daily dose and the insert labeling is intended to be shared for both products."*

This proprietary name is comprised of the root name "Dyanavel" and a modifier "XR". Per Tris Pharma, *the XR suffix is intended to connote "extended-release"*. The applicant also states "*the extended-release properties of the drug product have been demonstrated in a comparative bioavailability study to an equivalent 20 mg dose of the reference product, Dyanavel XR extended-release oral suspension conducted under the IND 129044 and submitted for Agency's review under NDA 210526 (Study 2016-4171)"*. We previously evaluated the appropriateness of the modifier "XR" and found it acceptable in OSE Review #2014-46334, dated March 11, 2015 for the extended-release oral suspension. Provided that the Office of Pharmaceutical Quality (OPQ) agrees with the applicant's assertion and determines that the proposed extended-release tablet product meets the criteria for this dosage form, we find the use of the modifier "XR" is acceptable for this proposed product.

[a] USAN stem search conducted on March 5, 2018.

2.2.3 Comments from Other Review Disciplines at Initial Review

In response to the OSE, January 26, 2018 e-mail, the Division of Psychiatry Products (DPP) did not forward any comments or concerns relating to the proposed proprietary name at the initial phase of the review.

2.2.4 Medication Error Data Selection of Cases

We searched the FDA Adverse Event Reporting System (FAERS) database using the strategy listed in Table 2 (see Appendix A1 for a description of FAERS database) for name confusion errors involving Dyanavel XR that would be relevant for this review.

Table 2. FAERS Search Strategy	
Search Date	March 5, 2018
Drug Name	Dyanavel XR
Event (MedDRA Terms)	**DMEPA Official PNR Name Confusion Search Terms Event List:** Preferred Terms: CIRCUMSTANCE OR INFORMATION CAPABLE OF LEADING TO MEDICATION ERROR DRUG ADMINISTRATION ERROR DRUG DISPENSING ERROR DRUG PRESCRIBING ERROR INTERCEPTED DRUG DISPENSING ERROR INTERCEPTED DRUG PRESCRIBING ERROR INTERCEPTED MEDICATION ERROR MEDICATION ERROR PRODUCT NAME CONFUSION TRANSCRIPTION MEDICATION ERROR Lower Level Terms: INTERCEPTED PRODUCT SELECTION ERROR INTERCEPTED WRONG DRUG PRODUCT SELECTED INTERCEPTED WRONG DRUG SELECTED PRODUCT SELECTION ERROR WRONG DEVICE DISPENSED WRONG DRUG ADMINISTERED WRONG DRUG DISPENSED WRONG DRUG PRESCRIBED WRONG DRUG PRODUCT SELECTED WRONG DRUG SELECTED WRONG PRODUCT SELECTED
Date Limits	10/19/2015 to 03/05/2018

The search yielded no cases.

2.2.5 Multiple Dosage Forms under a Single Proprietary Name

Dyanavel XR extended-release oral suspension is currently marketed in a 2.5 mg/mL strength under NDA 208147. We considered the appropriateness of using the same proprietary name, Dyanavel XR, for the extended-release tablets proposed under NDA 210526, which would represent a brand name product line extension. We note that the Dyanavel XR extended-release oral suspension and the proposed extended-release tablets share the same active ingredient (amphetamine), the same indication of use (treatment of ADHD), and the same patient population (children 6 years of age and older). The proposed dosing regimen is the same for both dosage forms with no dosing differences noted in the proposed Prescribing Information. The products differ in strength (2.5 mg/mL vs. 5 mg, 10 mg, 15 mg, and 20 mg) and dosage form (extended-release oral suspension vs. extended-release tablets). We note that according to Tris Pharma, the proposed 5 mg tablets are functionally scored and may be divided into equal halves for dose adjustments.

It is common and accepted practice to have a product line with multiple dosage forms share one proprietary name and while we note the strengths and dosage forms are different, these differences can be managed via labeling. Given the products share the same active ingredient, indication of use, patient population and dosing regimen, we believe that use of the name Dyanavel XR, for the proposed extended-release tablet formulation is appropriate.

Additionally, Tris Pharma states that Dyanavel XR oral suspension can be substituted with Dyanavel XR tablets at the equivalent daily dose. However, this assertion is currently under review by the Division. Provided that the review team confirms that these products can be substituted on a mg per mg basis and have no clinically significant differences, we do not anticipate this brand name extension will introduce medication errors related to switching between these dosage forms.

Furthermore, we have not retrieved any medication error name confusion reports involving Dyanavel XR. Therefore, given the precedent for using a single proprietary name to market multiple dosage forms, we have no safety concerns with the proposal to market the proposed tablets with the proprietary name, Dyanavel XR.

2.2.6 Communication of DMEPA's Analysis at Midpoint of Review

DMEPA communicated our findings to the Division of Psychiatry Products (DPP) via e-mail on April 10, 2018. At that time, we also requested additional information or concerns that could inform our review. Per e-mail correspondence from the DPP on April 13, 2018, they stated no additional concerns with the proposed proprietary name, Dyanavel XR.

3 CONCLUSION

The proposed proprietary name is acceptable.

If you have any questions or need clarifications, please contact Phuong B. Nguyen, OSE Project Manager, at 240-402-5827.

3.1 COMMENTS TO THE APPLICANT

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

If any of the proposed product characteristics as stated in your submission, received on January 16, 2018, are altered prior to approval of the marketing application, the name must be resubmitted for review.

APPEARS THIS WAY ON ORIGINAL

4 REFERENCES

1. ***USAN Stems (http://www.ama-assn.org/ama/pub/physician-resources/medical-science/united-states-adopted-names-council/naming-guidelines/approved-stems.page)***

   USAN Stems List contains all the recognized USAN stems.

2. ***Description of FAERS***

   The FDA Adverse Event Reporting System (FAERS) is a database that contains information on adverse event and medication error reports submitted to FDA. The database is designed to support the FDA's postmarket safety surveillance program for drug and therapeutic biologic products. The informatic structure of the FAERS database adheres to the international safety reporting guidance issued by the International Conference on Harmonisation. FDA's Office of Surveillance and Epidemiology codes adverse events and medication errors to terms in the Medical Dictionary for Regulatory Activities (MedDRA) terminology. Product names are coded using the FAERS Product Dictionary. More information about FAERS can be found at: http://www.fda.gov/Drugs/GuidanceComplianceRegulatoryInformation/Surveillance/AdverseDrugEffects/default.htm.

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/s/

LORETTA HOLMES
04/13/2018

LOLITA G WHITE
04/13/2018