CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

215092Orig1s000

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 14, 2022
Application Type and Number:	NDA 215092
Product Name and Strength:	Omlonti (omidenepag isopropyl) ophthalmic solution, 0.002%
Product Type:	Combination Product (Drug-Device)
Rx or OTC:	Prescription (Rx)
Applicant/Sponsor Name:	Santen Inc. (Santen)
PNR ID #:	2021-1044724577
DMEPA 1 Safety Evaluator:	Damon Birkemeier, PharmD
DMEPA 1 Team Leader:	Valerie S. Vaughan, PharmD
DMEPA 1 Associate Director for Nomenclature and Labeling:	Mishale Mistry, PharmD, MPH

1 INTRODUCTION

This memorandum is to reassess the proposed proprietary name, Omlonti, which was found conditionally acceptable under NDA 215092 on October 20, 2021.[a] However, NDA 215092 received a Complete Response (CR) on November 9, 2021. Thus, as part of their resubmission, Santen submitted the name, Omlonti, under NDA 215092 for review on May 6, 2022. 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 Omlonti would not misbrand the proposed product. The Division of Medication Error Prevention and Analysis 1 (DMEPA 1) concurred with the findings of OPDP's assessment for Omlonti. The Division of Ophthalmology (DO) concurred with the findings of OPDP's assessment for Omlonti.

2.2 SAFETY ASSESSMENT

For re-assessment of the proposed proprietary name, we evaluated the previously identified names of concern considering any lessons learned from recent post-marketing experience, which may have altered our previous conclusion regarding the acceptability of the proposed proprietary name. Our reassessment did not change our conclusion regarding the previously identified names of concern. Additionally, we searched the United States Adopted Name (USAN) stem list to determine if the proposed proprietary name contains any USAN stems as of the last USAN updates. The May 12, 2022, search of USAN stems did not find any USAN stems in the proposed proprietary name, Omlonti.

2.3 COMMUNICATION OF DMEPA'S DETERMINATION

On July 14, 2022, we communicated our determination to the Division of Ophthalmology (DO).

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, Omlonti, is acceptable.

If you have any questions or need clarifications, please contact Oyinlola Fashina, OSE project manager, at 301-796-4446.

3.1 COMMENTS TO SANTEN INC.

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

If any of the proposed product characteristics as stated in your submission, received on May 6, 2022, are altered prior to approval of the marketing application, the name must be resubmitted for review.

---

[a] Roosta N. Proprietary Name Review for Omlonti (NDA 215092). Silver Spring (MD): FDA, CDER, OSE, DMEPA 1 (US); 2021 OCT 21. PNR ID No. 2021-1044724083.

4 REFERENCE

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

   USAN Stems List contains all the recognized USAN stems.

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/

DAMON A BIRKEMEIER
07/14/2022 01:50:40 PM

VALERIE S VAUGHAN
07/14/2022 03:08:54 PM

MISHALE P MISTRY
07/18/2022 02:17:39 PM

PROPRIETARY NAME REVIEW

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:	October 20, 2021
Application Type and Number:	NDA 215092
Product Name and Strength:	Omlonti (omidenepag isopropyl) ophthalmic solution, 0.002%
Product Type:	Single Ingredient Product
Rx or OTC:	Prescription (Rx)
Applicant/Sponsor Name:	Santen Ltd. (Santen)
PNR ID #:	2021- 1044724083
DMEPA 1 Safety Evaluator:	Nasim Roosta, PharmD
DMEPA 1 Team Leader:	Valerie S. Vaughan, PharmD
DMEPA 1 Associate Director for Nomenclature and Labeling:	Mishale Mistry, PharmD, MPH

Contents

1 INTRODUCTION

This review evaluates the proposed proprietary name, Omlonti, 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. Santen submitted an external name study, conducted by [redacted] for this proposed proprietary name.

1.1 REGULATORY HISTORY

Santen previously submitted the proposed proprietary name, [redacted]*** on February 8, 2019, which we found conditionally acceptable on June 24, 2019 under IND 111518[a]. However, we found the name, [redacted]*** unacceptable due to phonetic similarities and shared product characteristics with the proprietary name, [redacted]*** under NDA 215092 on March 2, 2021.[b] Santen subsequently submitted the proposed proprietary name, [redacted], for review on April 29, 2021, which we found unacceptable because it would misbrand the proposed product.[c]

Thus, Santen submitted the name, Omlonti, for review on July 27, 2021.

1.2 PRODUCT INFORMATION

The following product information is provided in the proprietary name submission received on July 27, 2021.

- Intended Pronunciation: om lon' tee
- Active Ingredient: omidenepag isopropyl
- Indication of Use: Treatment of open-angle glaucoma or ocular hypertension
- Route of Administration: ophthalmic
- Dosage Form: ophthalmic solution
- Strength: 0.002%
- Dose and Frequency: one drop in the affected eye(s) once daily in the evening.
- How Supplied: It is supplied as a 2.5 mL solution in a 5 mL white low-density polyethylene bottle with a polyethylene dropper tip, a high-density polyethylene screw cap, and a tamper-evident low-density polyethylene overcap.
- Storage: Protect from light. Store the product under refrigeration at 2° to 8°C (36° to 46° F). [redacted].

---

[a] Roosta, N. Proprietary Name Review for [redacted] (IND 111518). Silver Spring (MD): FDA, CDER, OSE, DMEPA (US); 2019 JUN 24. Panorama No. 2019-29147870.

[b] Roosta, N. Proprietary Name Review for [redacted] (NDA 215092). Silver Spring (MD): FDA, CDER, OSE, DMEPA (US); 2021 MAR 2. Panorama No. 2020-44267450.

[c] Roosta, N. Proprietary Name Review for [redacted] (NDA 215092). Silver Spring (MD): FDA, CDER, OSE, DMEPA (US); 2021 JUN 28. Panorama No. 2021-1044723945.

2 RESULTS

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

2.1 MISBRANDING ASSESSMENT

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

2.2 SAFETY ASSESSMENT

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

2.2.1 United States Adopted Names (USAN) Search

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

2.2.2 Components of the Proposed Proprietary Name

Santen did not provide a derivation or intended meaning for the proposed proprietary name, Omlonti, in their submission. This proprietary name is comprised of a single word that does not contain any components (i.e. a modifier, route of administration, dosage form, etc.) that are misleading or can contribute to medication error.

2.2.3 Comments from Other Review Disciplines at Initial Review

On August 5, 2021, the Division of Ophthalmology (DO) did not forward any comments or concerns relating to Omlonti at the initial phase of the review.

2.2.4 FDA Name Simulation Studies

One hundred twenty-two (122) practitioners participated in DMEPA's prescription studies for Omlonti. 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[e] identified seventy-two (72) 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.

---

[d] USAN stem search conducted on September 13, 2021.

[e] POCA search conducted on September 1, 2021 in version 4.2.

2.2.6 Names Retrieved for Review Organized by Name Pair Similarity

Table 1 lists the number of names retrieved from our POCA search (b) (4) 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%	4
Moderately similar name pair: combined match percentage score ≥55% to ≤ 69%	51
Low similarity name pair: combined match percentage score ≤54%	23

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

Our analysis of the seventy-eight (78) names contained in Table 1 determined none of the names will pose a risk for confusion with Omlonti as described in Appendices C through H.

2.2.8 Communication of DMEPA's Analysis at Midpoint of Review

DMEPA 1 communicated our findings to the Division of Ophthalmology (DO). At that time we also requested additional information or concerns that could inform our review. On October 20, 2021, the Division of Ophthalmology (DO) stated no additional concerns with the proposed proprietary name, Omlonti.

3 CONCLUSION

The proposed proprietary name, Omlonti, is acceptable.

If you have any questions or need clarifications, please contact Oyinlola Fashina, OSE project manager, at 301-796-4446.

3.1 COMMENTS TO SANTEN LTD.

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

If any of the proposed product characteristics as stated in your submission, received on July 27, 2021, 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. [f]

[f] National Coordinating Council for Medication Error Reporting and Prevention. https://www nccmerp.org/about-medication-errors Last accessed 10/05/2020.

***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[g]. 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

[g] 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.

   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 ≥ 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.

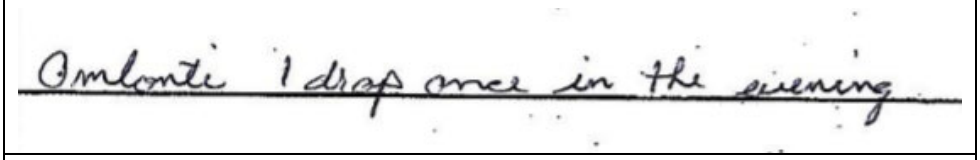
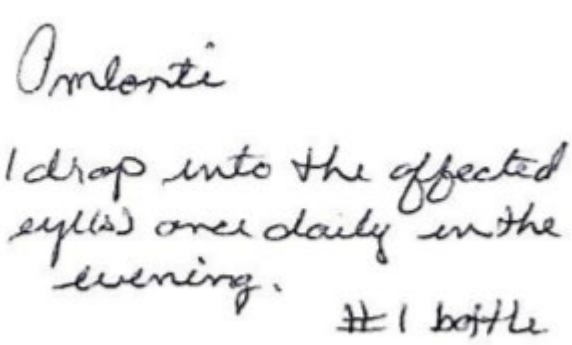
	Orthographic Checklist (Y/N to each question) • Do the names begin with different first letters? Note that even when names begin with different first letters, certain letters may be confused with each other when scripted. • Are the lengths of the names dissimilar* when scripted? *FDA considers the length 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. Omlonti Study (Conducted on August 13, 2021)

Handwritten Medication Order/Prescription	**Verbal Prescription**
Medication Order:  	Omlonti 1 drop into affected eye once daily in the evening Dispense 1 bottle
Outpatient Prescription:  	
CPOE Study Sample (displayed as sans-serif, 12-point, bold font)	
Omlonti	

FDA Prescription Simulation Responses (Aggregate Report)

261 People Received Study
122 People Responded

Study Name: Omlonti

Total	**27**	**30**	**29**	**36**	
INTERPRETATION	**OUTPATIENT**	**CPOE**	**VOICE**	**INPATIENT**	**TOTAL**
AMBONITE	0	0	0	1	1
AMBONTI	0	0	0	1	1
AMBONTIC	0	0	0	1	1
AMLONITE	0	0	0	1	1
AMLONTI	5	0	0	6	11
AMLONTIC	0	0	0	2	2

AMWANTI	0	0	1	0	1
AMWANTY	0	0	1	0	1
ARMONTY	0	0	1	0	1
AUMWANTI	0	0	1	0	1
OMBONTIC	0	0	0	1	1
OMLENTI	1	0	0	0	1
OMLONITE	0	0	0	1	1
OMLONTE	0	0	0	1	1
OMLONTI	19	30	0	20	69
OMLONTIC	0	0	0	1	1
OMLORTI	2	0	0	0	2
OMWANTI	0	0	8	0	8
OMWANTY	0	0	2	0	2
ONWANTI	0	0	1	0	1
ONWANTY	0	0	1	0	1
OWANTI	0	0	1	0	1
UHMLONTI	0	0	1	0	1
UMWANTE	0	0	1	0	1
UMWANTEE	0	0	2	0	2
UMWANTI	0	0	5	0	5
UMWANTY	0	0	2	0	2
UNWANTI	0	0	1	0	1

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

No.	**Proposed name:** Omlonti **Established name:** omidenepag isopropyl **Dosage form:** ophthalmic solution **Strength(s):** 0.002% **Usual Dose:** one drop in the affected eye(s) once daily in the evening.	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.	Omlonti***	100	Name is the subject of this review.
2.	Milontin	78	Brand discontinued with no generic equivalents available. NDA 008855 withdrawn FR effective 09/04/1996.
3.	Lomont	71	International product formerly marketed in the UK.
4.	Omontys	70	Brand discontinued with no generic equivalents available. NDA 202799 withdrawn FR effective 02/13/2019.

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 (%)
	N/A	

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:** Omlonti **Established name:** omidenepag isopropyl **Dosage form:** ophthalmic solution **Strength(s):** 0.002% **Usual Dose:** one drop in the affected eye(s) once daily in the evening.	POCA Score (%)	Prevention of Failure Mode In the conditions outlined below, the following combination of factors, are expected to minimize the risk of confusion between these two names
1.	(b) (4) ***	68	This name pair has sufficient orthographic and phonetic differences.
2.	Lomotil	65	This name pair has sufficient orthographic and phonetic differences.
3.	Mylanta	64	This name pair has sufficient orthographic and phonetic differences.

No.	**Proposed name:** Omlonti **Established name:** omidenepag isopropyl **Dosage form:** ophthalmic solution **Strength(s):** 0.002% **Usual Dose:** one drop in the affected eye(s) once daily in the evening.	**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**
4.	Zynlonta	64	This name pair has sufficient orthographic and phonetic differences.
5.	MS Contin	62	This name pair has sufficient orthographic and phonetic differences.
6.	Celontin	62	This name pair has sufficient orthographic and phonetic differences.
7.	Loniten	60	This name pair has sufficient orthographic and phonetic differences.
8.	Movantik	60	This name pair has sufficient orthographic and phonetic differences.
9.	Amlactin	60	This name pair has sufficient orthographic and phonetic differences. Orthographically, the additional letter ‘n’ in Amlactin provides some orthographic difference. Phonetically, the second syllables of the name pair (“lon” vs. “lac”) sound sufficiently different. In regard to product characteristics, Omlonti is a prescription-only ophthalmic medication intended to be administered ‘in the affected eye(s)’; in which, the provider would have to specify which eye(s) the medication is to be administered by use of the abbreviations OS, OD, or OU, or writing out the directions left eye, right eye, or both eyes. In contrast, Amlactin is the family root name used for over-the-counter topical moisturizers that are used as directed. This additional instruction, if included, would help mitigate the risk of product confusion.

No.	**Proposed name:** Omlonti **Established name:** omidenepag isopropyl **Dosage form:** ophthalmic solution **Strength(s):** 0.002% **Usual Dose:** one drop in the affected eye(s) once daily in the evening.	**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**
			Thus, considering the totality of factors listed above, we find the risk for name confusion is adequately minimized.
10.	(b) (4) ***	58	This name pair has sufficient orthographic and phonetic differences.
11.	Imotil	58	This name pair has sufficient orthographic and phonetic differences.
12.	Surmontil	58	This name pair has sufficient orthographic and phonetic differences.
13.	Masanti	58	This name pair has sufficient orthographic and phonetic differences.
14.	Eprontia***	58	This name pair has sufficient orthographic and phonetic differences.
15.	Bontril	57	This name pair has sufficient orthographic and phonetic differences.
16.	Dilantin-30	57	This name pair has sufficient orthographic and phonetic differences.
17.	Dilantin-125	57	This name pair has sufficient orthographic and phonetic differences.
18.	Dilantin	57	This name pair has sufficient orthographic and phonetic differences.
19.	Olumiant	56	This name pair has sufficient orthographic and phonetic differences.
20.	(b) (4) ***	56	This name pair has sufficient orthographic and phonetic differences.
21.	Romiplostim	56	This name pair has sufficient orthographic and phonetic differences.
22.	Neurontin	56	This name pair has sufficient orthographic and phonetic differences.
23.	Enlon	56	This name pair has sufficient orthographic and phonetic differences.
24.	Pronto	56	This name pair has sufficient orthographic and phonetic differences.
25.	Omnipen	55	This name pair has sufficient orthographic and phonetic differences.
26.	Tolmetin	55	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 (%)
1.	Melatonin	54
2.	Miltown	54
3.	Mol-Iron	52
4.	Aloemint	52
5.	Maltitol	52
6.	Omnicef	52
7.	Octylonium	50
8.	Motrin	50
9.	Micotil	50
10.	Nolinium	50
11.	Enmotion	50
12.	Lotrimin	49
13.	Golotimod	48
14.	Lemon Oil	48
15.	Contimin	48
16.	Motilium	47
17.	Metrolotion	46
18.	Montmorrillonite	46
19.	Omnitrope	46
20.	Omnaris	45
21.	Omalizumab	44
22.	Omega 3	37
23.	Omeprazole	28

Appendix G: Names not likely to be confused or not used in usual practice settings for the reasons described**.**

No.	Name	POCA Score (%)	Failure preventions
1.	Malotic	63	Veterinary product.
2.	Orlenta	62	Name identified in RxNorm database. Product is deactivated and no generic equivalents are available
3.	(b) (4)	62	(b) (4)
4.	Amilamont	62	International product marketed in the United Kingdom.

No.	Name	POCA Score (%)	Failure preventions
5.	Monit	61	International product formerly marketed in the United Kingdom.
6.	Opilon	58	International product formerly marketed in the United Kingdom.
7.	Tormentil	58	Name identified in RxNorm database. Unable to find product characteristics in commonly used drug databases.
8.	Monit LS	58	Name identified in RxNorm database. Unable to find product characteristics in commonly used drug databases.
9.	Emblon	58	International product formerly marketed in United Kingdom.
10.	Dolotic	57	Name identified in RxNorm database. Product is deactivated and no generic equivalents are available
11.	Nylon 612 (Mw14000)	56	Product is not a drug. It is chemical used in cosmetic products.
12.	Drontal	55	Veterinary product.

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

No.	Name	POCA Score (%)
1.	(b) (4) ***	62
2.	Io-Blend	60
3.	Biloptin	58
4.	Semilente	58
5.	Bronitin	57
6.	Implanon	56
7.	Allantoin	56
8.	Morantel	56
9.	Norplant	56
10.	(b) (4) ***	56
11.	Brondil	56
12.	(b) (4) ***	56
13.	Monocid	55

[h] 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

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/

NASIM N ROOSTA
10/20/2021 04:05:11 PM

VALERIE S VAUGHAN
10/21/2021 11:00:44 AM

MISHALE P MISTRY
10/21/2021 11:23:17 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:	June 28, 2021
Application Type and Number:	NDA 215092
Product Name and Strength:	(b) (4) (omidenepag isopropyl) ophthalmic solution, 0.002%
Product Type:	Single Ingredient Product
Rx or OTC:	Prescription (Rx)
Applicant/Sponsor Name:	Santen Ltd. (Santen)
Panorama #:	2021-1044723945
DMEPA Safety Evaluator:	Nasim Roosta, PharmD
DMEPA Team Leader:	Valerie S. Vaughan, PharmD
DMEPA Deputy Director:	Irene Z. Chan, PharmD, BCPS

6 Pages have been Withheld in Full as B4(CCI/ TS) Immediately Following this Page

---

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/

NASIM N ROOSTA
06/28/2021 11:41:18 AM

VALERIE S VAUGHAN
06/28/2021 12:17:20 PM

IRENE Z CHAN
07/01/2021 08:24:32 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:	March 2, 2021
Application Type and Number:	NDA 215092
Product Name and Strength:	(b) (4) (omidenepag isopropyl) ophthalmic solution, 0.002%
Product Type:	Single Ingredient Product
Rx or OTC:	Prescription (Rx)
Applicant/Sponsor Name:	Santen Ltd. (Santen)
Panorama #:	2020-44267450
DMEPA Safety Evaluator:	Nasim Roosta, PharmD
DMEPA Division Director (Acting):	Lubna Merchant, MS, PharmD

18 Pages have been Withheld in Full as B4(CCI/TS) Immediately Following this Page

---

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/

NASIM N ROOSTA
03/02/2021 08:56:05 AM

LUBNA A MERCHANT
03/02/2021 08:57:23 AM