CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

761215Orig2s000

OTHER REVIEW(S)

Center for Drug Evaluation and Research
Office of Pharmaceutical Quality
Office of Biotechnology Products

LABELS AND LABELING ASSESSMENT

Date of Assessment:	November 10, 2022
Assessor:	Scott Dallas, RPh Labeling Assessor Office of Biotechnology Products (OBP)
Through:	Anshu Rastogi, PhD Product Quality Assessor OBP/Division of Biotechnology Review and Research III
Application:	BLA 761215 ORIG-2
Applicant:	Eli Lilly and Company
Submission Date:	May 16, August 19, August 26, and November 10, 2022
Product:	Rezvoglar (insulin glargine-aglr)
Dosage form(s):	Injection
Strength and Container-Closure:	100 units/mL KwikPen (prefilled insulin delivery device)
Purpose of assessment:	The Applicant submitted a Complete Response – Resubmission to address the deficiency of interchangeability. As part of the resubmission the Applicant revised the prescribing information to include the interchangeability wording.
Recommendations:	The Prescribing Information, Instructions for Use, Patient Information, container label and carton labeling are acceptable from an OBP labeling perspective.

MATERIALS REVIEWED

Prescribing Information (submitted on August 19, 2022)

Annotated: \\CDSESUB1\EVSPROD\bla761215\0025\m1\us\proposed-uspi.docx

Proposed Clean: \\CDSESUB1\EVSPROD\bla761215\0025\m1\us\proposed-uspi-clean.docx

Instructions for Use (submitted on August 19, 2022)

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Proposed Clean: \\CDSESUB1\EVSPROD\bla761215\0025\m1\us\proposed-ifu-clean.docx

Patient Information (submitted on August 19, 2022)

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DISCUSSION

We assessed the proposed labeling for compliance with applicable requirements in the Code of Federal Regulations. Also, we assessed the proposed labeling for consistency with recommended labeling practices.

On May 16, 2022, the applicant submitted revised Prescribing Information to address the determination of interchangeability with the licensed reference product, Lantus.

On August 19, 2022, the applicant submitted revised Prescribing Information, Instructions for Use, and Patient Information labeling to align with the licensed reference product, Lantus, labeling approved on June 7, 2022.

On August 26, 2022, the applicant submitted the container label and carton labeling. The applicant did not propose any revisions to the container and carton labeling.

On November 10, 2022, the applicant submitted all pieces of the labeling, Prescribing Information, Instructions for Use, Patient Information, container and carton labeling, to incorporate all FDA and applicant agreed upon edits.

EVALUATION

Prescribing Information:

Highlights: The applicant revised the Highlights section by deleting the reference as a biosimilar and added the FDA recommended wording for an interchangeable product.

Dosage And Administration: The applicant revised the section to align with the licensed reference product, Lantus, labeling approved on June 7, 2022.

Dosage Forms and Strengths: The applicant revised the section to align with the licensed reference product, Lantus, labeling approved on June 7, 2022.

Description: The applicant revised the section to align with the licensed reference product, Lantus, labeling approved on June 7, 2022.

How Supplied/Storage and Handling: The applicant revised the section to align with the licensed reference product, Lantus, labeling approved on June 7, 2022. In addition, the applicant included a footnote to the table in section 16.2 Storage. The applicant indicated the footnote was added to help clarify the total room temperature storage timing. The footnote reads "When stored at room temperature, REZVOGLAR KwikPen can only be used for a total of 28 days including both not in-use (unopened) and in-use (opened) storage time." The applicant noted the proposed wording is consistent with wording in the Prescribing Information for other Lilly KwikPen product approvals (e.g, Lyumjev (insulin lispro-aabc) injection, BLA 761109).

The applicants' proposed revisions are acceptable from an OBP labeling perspective.

Instructions for Use:

The applicant revised the Instructions for Use to align with the licensed reference product, Lantus, labeling approved on June 7, 2022.

The applicants' proposed revisions are acceptable from an OBP labeling perspective.

Patient Information:
The applicant revised the Patient Information to align with the licensed reference product, Lantus, labeling approved on June 7, 2022.

The applicants' proposed revisions are acceptable from an OBP labeling perspective.

Container Label:
The applicant did not propose any revisions to the container label. The Division of Medication Errors and Prevention requested revisions to the Dosage statement. On November 10, 2022, the applicant submitted a container label with a revised Dosage statement.

The applicants' proposed revision is acceptable from an OBP labeling perspective.

Carton Labeling:
The applicant did not propose any revisions to the carton labeling. The Division of Medication Errors and Prevention requested revisions to the Dosage statement. On November 10, 2022, the applicant submitted a container label with a revised Dosage statement.

The applicants' proposed revision is acceptable from an OBP labeling perspective.

CONCLUSION

The Prescribing Information, Instructions for Use, Patient Information, container label and carton labeling submitted on November 10, 2022, were assessed and found to be acceptable from an OBP labeling perspective.

APPENDIX C. Acceptable Labels and Labeling

- Prescribing Information (submitted on November 10, 2022)
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- Instructions for Use (submitted on November 10, 2022)
  \\CDSESUB1\EVSPROD\bla761215\0029\m1\us\proposed-ifu-kwikpen-clean.docx

- Patient Information (submitted on November 10, 2022)
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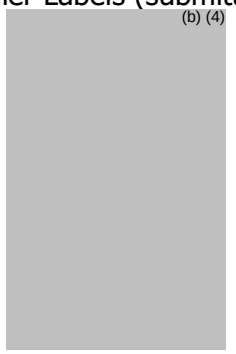
- Container Labels (submitted on November 10, 2022)

(b) (4)



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Scott Dallas

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Anshu Rastogi

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

PATIENT LABELING REVIEW

Date:	November 14, 2022
To:	Shiva Salartash Regulatory Project Manager **Division of Diabetes, Lipid Disorders, and Obesity (DDLO)**
Through:	LaShawn Griffiths, MSHS-PH, BSN, RN Associate Director for Patient Labeling **Division of Medical Policy Programs (DMPP)** Marcia Williams, PhD Team Leader, Patient Labeling **Division of Medical Policy Programs (DMPP)**
From:	Lonice Carter, MS, RN, CNL, NHDP-BC Patient Labeling Reviewer **Division of Medical Policy Programs (DMPP)**
Subject:	Review of Patient Labeling: Patient Package Insert (PPI) and Instructions for Use (IFU)
Drug Name (nonproprietary name):	REZVOGLAR (insulin glargine-aglr)
Dosage Form and Route:	injection, for subcutaneous use
Application Type/Number:	BLA 761215
Applicant:	Eli Lilly and Company

1 INTRODUCTION

On May 16, 2022, Eli Lilly and Company submitted for the Agency's review a Class 2 Resubmission for Biologics License Application 761215 REZVOGLAR (insulin glargine-aglr) injection, for subcutaneous use. On December 17, 2021 the Agency took 2 separate actions on this Application: issued a Complete Response for REZVOGLAR (insulin glargine-aglr) as interchangeable with US-licensed LANTUS (insulin glargine) and approved REZVOGLAR (insulin glargine-aglr) as a biosimilar to US-licensed LANTUS (insulin glargine). Therefore, the purpose of this resubmission is to propose REZVOGLAR (insulin glargine-aglr) as interchangeable with US-licensed LANTUS (insulin glargine).

This review is written by the Division of Medical Policy Programs (DMPP) in response to a request by the Division of Diabetes, Lipid Disorders, and Obesity (DDLO) on June 14, 2022 for DMPP to review the Applicant's proposed Patient Package Insert (PPI) and Instructions for Use (IFU) for REZVOGLAR (insulin glargine-aglr) injection, for subcutaneous use.

2 MATERIAL REVIEWED

- Revised draft REZVOGLAR (insulin glargine-aglr) PPI and IFU received on August 19, 2022, revised by the Review Division throughout the review cycle, and received by DMPP on October 25, 2022.
- Revised draft REZVOGLAR (insulin glargine-aglr) Prescribing Information (PI) received on August 19, 2022, revised by the Review Division throughout the review cycle, and received by DMPP on October 25, 2022.
- Approved LANTUS (insulin glargine) injection, for subcutaneous use comparator labeling dated June 7, 2022.

3 REVIEW METHODS

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

Additionally, in 2008 the American Society of Consultant Pharmacists Foundation (ASCP) in collaboration with the American Foundation for the Blind (AFB) published *Guidelines for Prescription Labeling and Consumer Medication Information for People with Vision Loss*. The ASCP and AFB recommended using fonts such as Verdana, Arial or APHont to make medical information more accessible for patients with vision loss.

In our review of the PPI and IFU we:

- simplified wording and clarified concepts where possible
- ensured that the PPI and IFU are consistent with the Prescribing Information (PI)

- removed unnecessary or redundant information
- ensured that the PPI and IFU meet the criteria as specified in FDA's Guidance for Useful Written Consumer Medication Information (published July 2006)
- ensured that the PPI and IFU are consistent with the approved comparator labeling where applicable.

4 CONCLUSIONS

The PPI and IFU are acceptable with our recommended changes.

5 RECOMMENDATIONS

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

Please let us know if you have any questions.

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/s/

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MARCIA B WILLIAMS
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LASHAWN M GRIFFITHS
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MEMORANDUM

REVIEW OF REVISED LABEL AND LABELING

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)

Date of This Memorandum:	November 10, 2022
Requesting Office or Division:	Division of Diabetes, Lipid Disorders, and Obesity (DDLO)
Application Type and Number:	BLA 761215
Product Name and Strength:	Rezvoglar KwikPen (insulin glargine-aglr) injection, 100 units/mL (300 units/3 mL)
Applicant/Sponsor Name:	Eli Lilly and Company (Lilly)
OSE RCM #:	2022-1150-1
DMEPA 1 Safety Evaluator:	Ariane O. Conrad, PharmD, BCACP, CDCES
DMEPA 1 Team Leader:	Idalia E. Rychlik, PharmD

1 PURPOSE OF MEMORANDUM

The Applicant submitted revised Rezvoglar KwikPen container label and carton labeling received on November 10, 2022. The Division of Diabetes, Lipid Disorders, and Obesity (DDLO) requested that we review the revised container label and carton labeling for Rezvoglar KwikPen (Appendix A) to determine if they are acceptable from a medication error perspective. The revisions are in response to recommendations that we made during a previous label and labeling review.[a]

2 CONCLUSION

The Applicant implemented all of our recommendations and we have no additional recommendations at this time.

[a] Conrad, A. Review of Revised Label and Labeling Memorandum for Rezvoglar KwikPen (BLA 761215). Silver Spring (MD): FDA, CDER, OSE, DMEPA 1 (US); 2022 Sep 15. RCM No.: 2022-1150.

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/s/

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