CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

211746Orig1s000

OTHER REVIEW(S)

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:	January 3, 2022
Requesting Office or Division:	Division of Pulmonology, Allergy, and Critical Care (DPACC)
Application Type and Number:	NDA 211746
Product Name and Strength:	Ryaltris (olopatadine HCl and mometasone furoate monohydrate) nasal spray, 665 mcg/25 mcg per spray
Applicant/Sponsor Name:	Glenmark
OSE RCM #:	2021-1059-1
DMEPA 1 Safety Evaluator:	Sarah K. Vee, PharmD
DMEPA 1 Team Leader:	Idalia E. Rychlik, PharmD

1 PURPOSE OF MEMORANDUM

The Applicant submitted revised container labels and carton labeling received on December 29, 2021 for Ryaltris. Division of Pulmonology, Allergy, and Critical Care (DPACC) requested that we review the revised container labels and carton labeling for Ryaltris (Appendix A) to determine if it is 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] Vee, S. Label and Labeling Review for Ryaltris (NDA 211746). Silver Spring (MD): FDA, CDER, OSE, DMEPA 1 (US); 2021 NOV 10. RCM No.: 2021-1059.

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/s/

SARAH K VEE
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IDALIA E RYCHLIK
01/04/2022 10:43:21 AM

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:	December 29, 2021
To:	Elaine Sit, PharmD Regulatory Health Project Manager **Division of Pulmonology, Allergy, and Critical Care (DPACC)**
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:	Mary Carroll, BSN, RN Patient Labeling Reviewer **Division of Medical Policy Programs (DMPP)** Kyle Snyder, PharmD Regulatory Review Officer **Office of Prescription Drug Promotion (OPDP)**
Subject:	Review of Patient Labeling: Patient Package Insert (PPI) and Instructions for Use (IFU)
Drug Name (established name):	RYALTRIS (olopatadine hydrochloride and mometasone furoate monohydrate)
Dosage Form and Route:	Nasal Spray
Application Type/Number:	NDA 211746
Applicant:	Glenmark Pharmaceuticals Inc., USA on behalf of Glenmark Specialty SA

1 INTRODUCTION

On July 12, 2021, Glenmark Pharmaceuticals Inc., on behalf of Glenmark Specialty SA resubmitted for the Agency's review an Original New Drug Application (NDA) 211746 for RYALTRIS (olopatadine hydrochloride and mometasone furoate monohydrate) Nasal Spray. RYALTRIS (olopatadine hydrochloride and mometasone furoate monohydrate nasal spray) is indicated for the treatment of symptoms associated with seasonal allergic rhinitis in patients 12 years of age and older (b) (4) .

This collaborative review is written by the Division of Medical Policy Programs (DMPP) and the Office of Prescription Drug Promotion (OPDP) in response to a request by the Division of Pulmonology, Allergy, and Critical Care (DPACC) on July 30, 2021 for DMPP and OPDP to review the Applicant's proposed Patient Package Insert (PPI) and Instructions for Use (IFU) for RYALTRIS (olopatadine hydrochloride and mometasone furoate monohydrate nasal spray).

2 MATERIAL REVIEWED

- Draft RYALTRIS (olopatadine hydrochloride and mometasone furoate monohydrate **NASAL SPRAY**) PPI and IFU received on July 12, 2021, and received by DMPP and OPDP on December 20, 2021.
- Draft RYALTRIS (olopatadine hydrochloride and mometasone furoate monohydrate **NASAL SPRAY**) Prescribing Information (PI) received on July 12, 2021, revised by the Review Division throughout the review cycle, and received by DMPP and OPDP on December 20, 2021.
- Approved NASONEX comparator labeling dated January 19, 2018.
- Approved FLONASE comparator labeling dated January 7, 2019

3 REVIEW METHODS

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

Additionally, in 2008 the American Society of Consultant Pharmacists Foundation (ASCP) in collaboration with the American Foundation for the Blind (AFB) published *Guidelines for Prescription Labeling and Consumer Medication Information for People with Vision Loss*. The ASCP and AFB recommended using fonts such as Verdana, Arial or APHont to make medical information more accessible for patients with vision loss. We reformatted the PPI and IFU document using the Arial font, size 10.

In our collaborative review of the PPI and IFU we:

- simplified wording and clarified concepts where possible

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

4 CONCLUSIONS

The PPI and IFU are acceptable with our recommended changes.

5 RECOMMENDATIONS

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

Please let us know if you have any questions.

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/s/

MARY E CARROLL
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KYLE SNYDER
12/29/2021 04:42:54 PM

MARCIA B WILLIAMS
12/29/2021 04:47:14 PM

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

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

Memorandum

Date: December 29, 2021

To: Elaine Sit, Regulatory Health Project Manager
Division of Pulmonology, Allergy, and Critical Care (DPACC)

From: Kyle Snyder, Regulatory Review Officer
Office of Prescription Drug Promotion (OPDP)

CC: Twyla Thompson, Acting Team Leader, OPDP

Subject: OPDP Labeling Comments for RYALTRIS (olopatadine hydrochloride and mometasone furoate monohydrate nasal spray)

NDA: 211746

In response to DPACC's consult request dated July 29, 2021, OPDP has reviewed the proposed prescribing information (PI), patient package insert (PPI), and Instructions for Use (IFU), for the original NDA submission for RYALTRIS (olopatadine hydrochloride and mometasone furoate monohydrate nasal spray).

PI: OPDP's comments on the proposed labeling are based on the draft PI received by electronic mail from DPACC on December 21, 2021, and are provided below.

PPI and IFU: A combined OPDP and Division of Medical Policy Programs (DMPP) review will be completed, and comments on the proposed PPI and IFU will be sent under separate cover.

Thank you for your consult. If you have any questions, please contact Kyle Snyder at (240) 402-8792 or kyle.snyder@fda.hhs.gov.

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/s/

KYLE SNYDER
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LABEL AND LABELING 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:	November 10, 2021
Requesting Office or Division:	Division of Pulmonology, Allergy, and Critical Care (DPACC)
Application Type and Number:	NDA 211746
Product Name, Dosage Form, and Strength:	Ryaltris (olopatadine HCl and mometasone furoate monohydrate) nasal spray, 665 mcg/25 mcg per spray
Product Type:	Combination Product (Drug-Device)
Rx or OTC:	Prescription (Rx)
Applicant/Sponsor Name:	Glenmark
FDA Received Date:	July 13, 2021
OSE RCM #:	2021-1059
DMEPA 1 Safety Evaluator:	Sarah K. Vee, PharmD
DMEPA 1 Team Leader:	Idalia E. Rychlik, PharmD

1 REASON FOR REVIEW

As part of the approval process for Ryaltris (olopatadine HCl and mometasone furoate monohydrate) nasal spray, the Division of Pulmonology, Allergy, and Critical Care (DPACC) requested that we review the proposed Ryaltris prescribing information (PI), instructions for use, container label, and carton labeling for areas of vulnerability that may lead to medication errors.

2 REGULATORY HISTORY

NDA 211746 was originally submitted on May 21, 2018. However, it received a complete response (CR) on June 20, 2019 due to facility inspection and product quality issues. We previously reviewed the proposed labeling (see Appendix B). Glenmark submitted a response to the CR on July 13, 2021 which included updated labels and labeling.

3 MATERIALS REVIEWED

We considered the materials listed in Table 1 for this review. The Appendices provide the methods and results for each material reviewed.

Table 1. Materials Considered for this Review

Material Reviewed	Appendix Section (for Methods and Results)
Product Information/Prescribing Information	A
Previous DMEPA Reviews	B
Human Factors Study	C – N/A
ISMP Newsletters*	D – N/A
FDA Adverse Event Reporting System (FAERS)*	E – N/A
Other	F – N/A
Labels and Labeling	G

N/A=not applicable for this review
*We do not typically search FAERS or ISMP Newsletters for our label and labeling reviews unless we are aware of medication errors through our routine postmarket safety surveillance

4 CONCLUSION & RECOMMENDATIONS

We reviewed the proposed PI, container label, and carton labeling. We had previously reviewed the labeling (see Appendix B). The Applicant revised the container label and carton labeling to include the new distributor (Hikma). We conclude that the proposed container label, carton labeling, and PI can be improved to promote the safe use of the product as described in Sections 4.1.

4.1 RECOMMENDATIONS FOR DPACC

We recommend the following be implemented prior to approval of this NDA:

A. Prescribing information

1. Highlights: Dosage Forms and Strengths Section

a. We recommend clarifying that each spray delivers 665 mcg/25 mcg of olopatadine HCl and mometasone furoate. We recommend revising the section to mirror the full prescribing information Section 3 to state that each spray delivers 665 mcg of olopatadine hydrochloride and 25 mcg of mometasone furoate.

2. Section 16: How supplied/Storage and Handling

a. This section is overly wordy and includes information that is not pertinent to this section such as priming information. We recommend revising the section as described below:

RYALTRIS (NDC 59467-700-27) is supplied in a white plastic bottle fitted with a metered-dose spray pump unit. Each bottle contains a net fill weight of 29 g and will deliver 240 metered sprays in addition to six (6) initial priming sprays *[see Description (11)]*.

(b) (4) Each spray delivers a volume of 0.1 mL suspension as a fine mist, containing 665 mcg of olopatadine hydrochloride and 25 mcg of mometasone furoate (665 mcg/25 mcg). (b) (4) The bottle should be discarded after 240 sprays have been used.

4.2 RECOMMENDATIONS FOR GLENMARK

We recommend the following be implemented prior to approval of this NDA:

B. General Comments (Container labels & Carton Labeling)

1. To ensure consistency with the Prescribing Information, revise the statement, (b) (4) to read "Recommended Dosage: See prescribing information."

2. The name of the distributor is more prominent than other important information (e.g., established name and strength) and draws the attention away from them. Relocate the distributor name to the side panel or decrease the prominence.

3. Increase the prominence of the strength statement. Prominence of other information such as the distributor's name and NDC # draws attention away from the strength statement.

APPENDICES: METHODS & RESULTS FOR EACH MATERIALS REVIEWED

APPENDIX A. PRODUCT INFORMATION/PRESCRIBING INFORMATION

Table 2 presents relevant product information for Ryaltris received on July 13, 2021 from Glenmark.

Table 2. Relevant Product Information for Ryaltris	
Initial Approval Date	N/A
Active Ingredient	olopatadine HCl and mometasone furoate monohydrate
Indication	for the treatment of symptoms associated with seasonal allergic rhinitis in patients 12 years of age and older (b) (4)
Route of Administration	intranasal
Dosage Form	nasal spray
Strength	665 mcg/25 mcg per spray
Dose and Frequency	2 sprays in each nostril twice daily
How Supplied	Supplied in a white plastic bottle fitted with a metered dose spray pump unit. 1 spray bottle per carton.
Storage	Store RYALTRIS upright with the dust cap on at room temperature (see USP Controlled Room Temperature, between (b) (4) °C and 25°C, or between (b) (4) °F and 77°F, with excursions permitted between 15°C to 30°C or between 59°F to 86°F). Do not store in a freezer or refrigerator. Shake well before each use

APPENDIX B. PREVIOUS DMEPA REVIEWS

On October 7, 2021, we searched for previous DMEPA reviews relevant to this current review using the terms, Ryaltris. Our search identified two previous reviews[a,b], and we considered our previous recommendations to see if they are applicable for this current review.

APPENDIX G. LABELS AND LABELING

G.1 List of Labels and Labeling Reviewed

Using the principles of human factors and Failure Mode and Effects Analysis,[c] along with postmarket medication error data, we reviewed the following Ryaltris labels and labeling submitted by Glenmark.

- Container label received on July 13, 2021
- Carton labeling received on July 13, 2021
- Professional Sample label received on July 13, 2021
- Professional Sample Carton Labeling received on July 13, 2021
- Instructions for Use received on July 13, 2021, available from \\CDSESUB1\evsprod\NDA211746\0026\m1\us\114-labeling\114a-draft-label
- Prescribing Information (Image not shown) received on July 13, 2021, available from \\CDSESUB1\evsprod\NDA211746\0026\m1\us\114-labeling\114a-draft-label

G.2 Label and Labeling Images

[a] Owens, L. Label and Labeling Review for Ryaltris (NDA 211746). Silver Spring (MD): FDA, CDER, OSE, DMEPA (US); 2018 DEC 17. RCM No.: 2018-1060.

[b] Owens, L. Label and Labeling Review for Ryaltris (NDA 211746). Silver Spring (MD): FDA, CDER, OSE, DMEPA (US); 2019 JAN 31. RCM No.: 2018-1060-1.

[c] Institute for Healthcare Improvement (IHI). Failure Modes and Effects Analysis. Boston. IHI:2004.

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/s/

SARAH K VEE
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IDALIA E RYCHLIK
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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:	April 15, 2019
To:	Sally Seymour, MD Acting Director **Division of Pulmonary, Allergy, and Rheumatology Products (DPARP)**
Through:	LaShawn Griffiths, MSHS-PH, BSN, RN Associate Director for Patient Labeling **Division of Medical Policy Programs (DMPP)**
From:	Sharon W. Williams, MSN, BSN, RN Senior Patient Labeling Reviewer **Division of Medical Policy Programs (DMPP)** Kyle Snyder, Pharm.D. Regulatory Review Officer **Office of Prescription Drug Promotion (OPDP)**
Subject:	Review of Patient Labeling: Patient Package Insert (PPI) and Instructions for Use (IFU)
Drug Name (established name):	RYALTRIS (olopatadine hydrochloride and mometasone furoate monohydrate)
Dosage Form and Route:	Nasal Spray
Application Type/Number:	NDA 211746
Applicant:	Glenmark Pharmaceuticals Inc., USA on behalf of Glenmark Specialty SA

1 INTRODUCTION

On May 21, 2018, Glenmark Pharmaceuticals Inc., USA on behalf of Glenmark Specialty SA submitted for the Agency's review an Original New Drug Application for RYALTRIS (olopatadine hydrochloride and mometasone furoate monohydrate) Nasal Spray. RYALTRIS (olopatadine hydrochloride and mometasone furoate monohydrate) Nasal Spray is indicated for the treatment of symptoms associated with seasonal allergic rhinitis in patients 12 years of age and older [redacted] (b) (4)

This collaborative review is written by the Division of Medical Policy Programs (DMPP) and the Office of Prescription Drug Promotion (OPDP) in response to a request by the Division of Pulmonary, Allergy, and Rheumatology Products (DPARP) on June 8, 2018 for DMPP and OPDP to review the Applicant's proposed Patient Package Insert (PPI) and Instructions for Use (IFU) for RYALTRIS (olopatadine hydrochloride and mometasone furoate monohydrate) Nasal Spray.

2 MATERIAL REVIEWED

- Draft RYALTRIS (olopatadine hydrochloride and mometasone furoate monohydrate) Nasal Spray PPI and IFU received on May 21, 2018 received by DMPP and OPDP on April 2, 2019.
- Draft RYALTRIS (olopatadine hydrochloride and mometasone furoate monohydrate) Nasal Spray Prescribing Information (PI) received on May 21, 2018, revised by the Review Division throughout the review cycle, and received by DMPP and OPDP on April 2, 2019.
- Approved NASONEX comparator labeling dated June 22, 2018.
- Approved FLONASE comparator labeling dated January 7, 2019.

3 REVIEW METHODS

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

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. We have reformatted the PPI and IFU document using the Verdana font, size 10.

In our collaborative review of the PPI and IFU we have:

- ensured that the PPI and IFU are consistent with the Prescribing Information (PI)

- ensured that the PPI and IFU meets the criteria as specified in FDA's Guidance for Useful Written Consumer Medication Information (published July 2006)

4 CONCLUSIONS

The PPI and IFU are acceptable with our recommended changes.

5 RECOMMENDATIONS

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

Please let us know if you have any questions.

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/s/

SHARON W WILLIAMS
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LASHAWN M GRIFFITHS
04/15/2019 12:46:04 PM

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

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

Memorandum

Date: April 11, 2019

To: Mary O'Donnell, Clinical Reviewer
Division of Pulmonary, Allergy, and Rheumatology Products (DPARP)

Linda Ebonine, Regulatory Project Manager, DPARP

From: Kyle Snyder, Regulatory Review Officer
Office of Prescription Drug Promotion (OPDP)

CC: Kathleen Klemm, Team Leader, OPDP

Subject: OPDP Labeling Comments for RYALTRIS (olopatadine hydrochloride and mometasone furoate monohydrate nasal spray), for intranasal use

NDA: 211746

In response to DPARP's consult request dated June 8, 2018, OPDP has reviewed the proposed prescribing information (PI), patient package insert (PPI), Instructions for Use (IFU), and carton and container labeling for the original NDA submission for RYALTRIS (olopatadine hydrochloride and mometasone furoate monohydrate nasal spray), for intranasal use.

PI: OPDP's comments on the proposed labeling are based on the draft PI received by electronic mail from DPARP on April 2, 2018, and are provided below.

PPI and IFU: A combined OPDP and Division of Medical Policy Programs (DMPP) review will be completed, and comments on the proposed PPI and IFU will be sent under separate cover.

Carton and Container Labeling: OPDP has reviewed the attached proposed carton and container labeling received by electronic mail from DPARP on April 2, 2018, and our comments are provided below.

Thank you for your consult. If you have any questions, please contact Kyle Snyder at (240) 402-8792 or kyle.snyder@fda.hhs.gov.

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/s/

KYLE SNYDER
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MEMORANDUM

REVIEW OF REVISED LABEL AND LABELING

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)

Date of This Memorandum:	January 31, 2019
Requesting Office or Division:	Division of Pulmonary, Allergy, and Rheumatology Products (DPARP)
Application Type and Number:	NDA 211746
Product Name and Strength:	Ryaltris (olopatadine hydrochloride and mometasone furoate) Nasal Spray 665 mcg/25 mcg per spray
Applicant/Sponsor Name:	Glenmark Pharma
FDA Received Date:	January 25, 2019
OSE RCM #:	2018-1060-1
DMEPA Safety Evaluator:	Lissa C. Owens, PharmD
DMEPA Team Leader:	Sarah K. Vee, PharmD

1 PURPOSE OF MEMORANDUM

Division of Pulmonary, Allergy, and Rheumatology Products (DPARP) requested that we review the revised container label and carton labeling for Ryaltris (Appendix A) to determine if it is 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 revised container label and carton labeling for Ryaltris is acceptable from a medication error perspective. We have no further recommendations at this time.

[a] Owens, L. Label and Labeling Review for Ryaltris olopatadine hydrochloride and mometasone furoate) Nasal Spray (NDA 211746). Silver Spring (MD): FDA, CDER, OSE, DMEPA (US); 2018 DEC 17. RCM No.: 2018-1060.

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/s/

LISSA C OWENS
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SARAH K VEE
01/31/2019 02:08:39 PM

LABEL AND LABELING 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:	December 17, 2018
Requesting Office or Division:	Division of Pulmonary, Allergy, and Rheumatology Products (DPARP)
Application Type and Number:	NDA 211746
Product Name and Strength:	Ryaltris (olopatadine hydrochloride and mometasone furoate) Nasal Spray 665 mcg/25 mcg per spray
Product Type:	Combination Product
Rx or OTC:	Rx
Applicant/Sponsor Name:	Glenmark Pharma
FDA Received Date:	May 21, 2018
OSE RCM #:	2018-1060
DMEPA Safety Evaluator:	Lissa C. Owens, PharmD
DMEPA Team Leader:	Sarah K. Vee, PharmD

1 PURPOSE OF REVIEW

As part of the approval process for Ryaltris (olopatadine hydrochloride and mometasone furoate) Nasal Spray 665 mcg/25 mcg, the Division of Pulmonary, Allergy, and Rheumatology Products (DPARP) requested that we review the proposed packaging, label, and labeling for areas that may lead to medication errors.

2 MATERIALS REVIEWED

Table 1. Materials Considered for this Label and Labeling Review	
Material Reviewed	Appendix Section (for Methods and Results)
Product Information/Prescribing Information	A
Previous DMEPA Reviews	B-N/A
ISMP Newsletters	C-N/A
FDA Adverse Event Reporting System (FAERS)*	D-N/A
Other	E-N/A
Labels and Labeling	F

N/A=not applicable for this review

*We do not typically search FAERS for our label and labeling reviews unless we are aware of medication errors through our routine postmarket safety surveillance

3 FINDINGS AND RECOMMENDATIONS

Table 2 below includes the identified medication error issues with the submitted labeling, DMEPA's rationale for concern, and the proposed recommendation to minimize the risk for medication error.

Table 2: Identified Issues and Recommendations for Glenmark Pharma

Carton labeling			
	IDENTIFIED ISSUE	RATIONALE FOR CONCERN	RECOMMENDATION
1.	*On the carton under the header 'Dosing Instructions Shake the bottle well before each use', instructions to remove the dust cap are not present.*	*We note that there are instructions referring patients to the full prescribing information. However; if patients only utilize the on carton instructions , they may not realize the dust cap should be removed prior to use as*	*After the header: 'Dosing Instructions Shake the bottle well before each use', add the statement 'Remove the purple plastic dust cap from the spray pump tip of the bottle' as stated in Step 1 in the Instructions for Use.*

		stated in step 1 of the Instructions for Use	
Carton Labeling and Container Label			
2.	*NDC number is denoted by a placeholder. There is no linear bar code.*	*The barcode rule (21 CFR 201.25) requires a linear barcode that contains, at a minimum, the NDC. We generally request manufacturers provide the NDC along with the linear barcode on container labels and carton labeling. The drug barcode is often used as an additional verification before drug administration in the hospital setting; therefore, it is an important safety feature that should be part of the label whenever possible.*	*Per 21 CFR 207.33, drug products subject to listing with the FDA must have a unique NDC to identify its labeler, product, and package size and type. Please submit the actual NDC number for review. We also request you add the product's linear barcode to each individual package as required per 21CFR 201.25(c)(2).*
3.	*Expiration Date*	*As currently presented, there is no placeholder designated for the expiration date. To minimize confusion and reduce the risk for deteriorated drug medication errors, identify the format you intend to use.*	*FDA recommends that the expiration date appear in YYYY-MM-DD format if only numerical characters are used or in YYYY-MMM-DD if alphabetical characters are used to represent the month. If there are space limitations on the drug package, the human-readable text may include only a year and month, to be expressed as: YYYY-MM if only numerical characters are used or YYYY-MMM if alphabetical characters are used to represent the month. FDA recommends that a hyphen or a space be used to separate the portions of the expiration date.*

4 CONCLUSION

Our evaluation of the proposed packaging, label, and labeling identified areas of vulnerability the Applicant. We ask that the Division convey Table 2 in its entirety to the applicant so that recommendations are implemented prior to approval of this NDA.

APPENDICES: METHODS & RESULTS FOR EACH MATERIALS REVIEWED

APPENDIX A. PRODUCT INFORMATION/PRESCRIBING INFORMATION

Table 4 presents relevant product information for Ryaltris that Glenmark Pharma submitted on May 21, 2018.

Table 4. Relevant Product Information for Ryaltris	
Initial Approval Date	N/A
Active Ingredient	Olopatadine hydrochloride and mometasone furoate
Indication	Treatment of symptoms associated with seasonal allergic rhinitis in patients 12 years of age and older
Route of Administration	Intranasal
Dosage Form	Nasal Spray
Strength	665 mcg/25 mcg
Dose and Frequency	2 sprays into each nostril twice daily
How Supplied	White plastic bottle fitted with a metered-dose spray pump unit
Storage	Store upright with the dust cap on at room temperature (see USP Controlled Room Temperature, between (b) (4)°C and 25°C, or between (b) (4)°F and 77°F, with excursions permitted between 15°C to 30°C or between 59°F to 86°F). Do not store in a freezer or refrigerator
Container Closure	The primary packaging consists of a round 30 mL/20 mm white, high density polyethylene (HDPE) bottle for the 240 MD commercial presentation and a round 20 mL / 20 mm white HDPE bottle for the 56 MD physician's sample, a (b) (4) pump, a white nasal actuator, and purple overcap

APPENDIX F. LABELS AND LABELING

F.1 List of Labels and Labeling Reviewed

Using the principles of human factors and Failure Mode and Effects Analysis,[a] along with postmarket medication error data, we reviewed the following Ryaltris labels and labeling submitted by Glenmark Pharma on May 21, 2018.

- Container label received on May 21, 2018
- Carton labeling received on May 21, 2018
- Professional Sample label received on May 21, 2018
- Professional Sample Carton Labeling received on May 21, 2018
- Instructions for Use (Image not shown) received on May 21, 2018
- Prescribing Information (Image not shown) received on May 21, 2018

F.2 Label and Labeling Images

[a] Institute for Healthcare Improvement (IHI). Failure Modes and Effects Analysis. Boston. IHI:2004.

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/

LISSA C OWENS
12/17/2018

SARAH K VEE
12/17/2018