

**CENTER FOR DRUG EVALUATION AND
RESEARCH**

APPLICATION NUMBER:

217225Orig1s000

PROPRIETARY NAME REVIEW(S)

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:	February 8, 2023
Application Type and Number:	NDA 217225 and IND 077902
Product Name and Strength:	Izervay (avacincaptad pegol) Injection, 2 mg/0.1 mL
Product Type:	Single Ingredient Product
Rx or OTC:	Prescription (Rx)
Applicant/Sponsor Name:	IVERIC bio, Inc., (Iveric)
PNR ID #:	2022-1044724841
DMEPA 1 Safety Evaluator:	Deborah Myers, RPh, MBA
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1 INTRODUCTION

This review evaluates the proposed proprietary name, Izervay, 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. Iveric submitted an external name study, conducted by (b) (4) for this proposed proprietary name.

1.1 REGULATORY HISTORY

Iveric submitted the proposed proprietary name, Izervay, for review under IND 077902 on September 13, 2022. Subsequently, Iveric submitted the name, Izervay, for review under NDA 217225 on November 14, 2022.

This review evaluates the proposed proprietary name, Izervay, under both IND 077902 and NDA 217225.

1.2 PRODUCT INFORMATION

The following product information is provided in the proprietary name submission received on November 14, 2022.

- Intended Pronunciation: ahy-zer-vey
- Active Ingredient: avacincaptad pegol
- Indication of Use: for the treatment of Geographic Atrophy (GA) secondary to Age-related Macular Degeneration (AMD)
- Route of Administration: intravitreal injection
- Dosage Form: Injection
- Strength: 2 mg/0.1 mL
- Dose and Frequency: 2 mg (0.1 mL of 20 mg/mL solution solution) administered by intravitreal injection once monthly (approximately every 28 ± 7 days)
- How Supplied: Avacincaptad pegol injection is supplied as a sterile, clear to slightly opalescent, colorless to slightly yellowish 20 mg/mL solution in a single-dose glass vial. Each glass vial contains an overfill amount to allow administration of a single 0.1 mL dose of solution containing 2 mg of avacincaptad pegol.

Each carton contains one glass vial, one sterile 5-micron transfer filter needle (19-gauge x 1½ inch, 1.1 mm x 40 mm), and one sterile 1 mL Luer lock syringe.

- Storage: Store in the refrigerator between 2°C to 8°C (36°F to 46°F). Do not freeze. Do not shake. Keep the vial in the original carton to protect from light.

2 RESULTS

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

2.1 MISBRANDING ASSESSMENT

The Office of Prescription Drug Promotion (OPDP) determined that Izervay 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 Izervay. The Division of Ophthalmology (DO) concurred with the findings of OPDP's assessment for Izervay.

2.2 SAFETY ASSESSMENT

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

2.2.1 United States Adopted Names (USAN) Search

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

2.2.2 Components of the Proposed Proprietary Name

Iveric did not provide a derivation or intended meaning for the proposed proprietary name, Izervay, in their submission. The proposed proprietary name, Izervay, is comprised of a single word. We note that the proposed proprietary name, Izervay includes the letter strings; '-er-', an abbreviation for the modifier, "extended release" and '-va-', an abbreviation for "visual acuity." In some circumstances, the incorporation of medical abbreviations in proprietary names can inadvertently be a source of error. For more information see draft guidance, *Best Practices in Developing Proprietary Names for Human Prescription Drug Products*.^b Although we typically discourage the inclusion of medical abbreviations in proprietary names, we determined that the abbreviations, 'er' and 'va', in the infix of the name are unlikely to be separated from the surrounding letters in a manner that would lead to confusion in this case.

Thus, in this case, we do not object to the inclusion of the letter strings 'er' and 'va' in the infix of the proposed proprietary name.

2.2.3 Comments from Other Review Disciplines at Initial Review

On December 27, 2022, the Division of Ophthalmology (DO) did not forward any comments or concerns relating to Izervay at the initial phase of the review.

2.2.4 FDA Name Simulation Studies

One hundred and two practitioners participated in DMEPA's prescription studies for Izervay. 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.

We note that in the voice simulation study, the first syllable 'Ize' was misinterpreted as 'HyZ' by three participants and 'Tyz' by one participant. In the inpatient written simulation study, the beginning letter string 'Ize-' was misinterpreted as 'Azu-' by one participant and 'Syi-' by one participant. In the outpatient written simulation study, the beginning letter string 'Ize-' was

^a USAN stem search conducted on November 17, 2022.

^b Guidance for Industry: Best Practices in Developing Proprietary Names for Human Prescription Drug Products. 2020. Available from: <https://www.fda.gov/regulatory-information/search-fda-guidance-documents>.

misinterpreted as ‘Lur-’ by one participant. We have considered these phonetic and orthographic similarities and these variations in our analysis.

One participant in the verbal prescription FDA Prescription Simulation study misinterpreted Izervay as Isoday, which is a direct hit to a previously marketed product in Switzerland. Thus, the risk of name confusion between the name pair is minimized (see Appendix G).

Appendix B contains the results from the prescription simulation studies.

2.2.5 *Phonetic and Orthographic Computer Analysis (POCA) Search Results*

Our POCA search^c identified 57 names with a combined phonetic and orthographic score of $\geq 55\%$ or an individual phonetic or orthographic score $\geq 70\%$. These names are included in Table 1 below.

2.2.6 *Names Retrieved for Review Organized by Name Pair Similarity*

Table 1 lists the number of names retrieved from our POCA search, FDA Prescription Simulation Studies, and ^{(b) (4)} external study. These name pairs are organized as highly similar, moderately similar or low similarity for further evaluation.

Table 1. Names Retrieved for Review Organized by Name Pair Similarity	
Similarity Category	Number of Names
Highly similar name pair: combined match percentage score $\geq 70\%$	1
Moderately similar name pair: combined match percentage score $\geq 55\%$ to $\leq 69\%$	127
Low similarity name pair: combined match percentage score $\leq 54\%$	7

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

Our analysis of the 135 names contained in Table 1 determined none of the names will pose a risk for confusion with Izervay as described in Appendices C through H.

2.2.8 *Communication of DMEPA’s Determination*

On February 8, 2023, DMEPA 1 communicated our determination to the Division of Ophthalmology (DO).

3 CONCLUSION

The proposed proprietary name, Izervay, is conditionally acceptable.

^c POCA search conducted on November 17, 2022 in version 5.0.

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

3.1 COMMENTS TO IVERIC BIO, INC.,

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

If any of the proposed product characteristics as stated in your submission, received on November 14, 2022, 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.^d

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

- Low similarity: combined match percentage score $\leq 54\%$.

Using the criteria outlined in the check list (Table 3-5) that corresponds to each of the three categories (highly similar pair, moderately similar pair, and low similarity), DMEPA evaluates the name pairs to determine the acceptability or non-acceptability of a proposed proprietary name. The intent of these checklists is to increase the transparency and predictability of the safety determination of whether a proposed name is vulnerable to confusion from a look-alike or sound-alike perspective. Each bullet below corresponds to the name similarity category cross-references the respective table that addresses criteria that DMEPA uses to determine whether a name presents a safety concern from a look-alike or sound-alike perspective.

- For highly similar names, differences in product characteristics often cannot mitigate the risk of a medication error, including product differences such as strength and dose. Thus, proposed proprietary names that have a combined score of ≥ 70 percent are at risk for a look-alike sound-alike confusion which is an area of concern (See Table 3).
- Moderately similar names are further evaluated to identify the presence of attributes that are known to cause name confusion.
 - Name attributes: We note that the beginning of the drug name plays a significant role in contributing to confusion. Additionally, drug name pairs that start with the same first letter and contain a shared letter string of at least 3 letters in both names are major contributing factor in the confusion of drug names^e. 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

^e 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.

Additionally, other review disciplines opinions such as ONDQA or OBP may be considered depending on the proposed proprietary name.

When provided, DMEPA considers external proprietary name studies conducted by or for the Applicant/Sponsor and incorporates the findings of these studies into the overall risk assessment.

The DMEPA primary reviewer assigned to evaluate the proposed proprietary name is responsible for considering the collective findings, and provides an overall risk assessment of the proposed proprietary name.

Table 3. Highly Similar Name Pair Checklist (i.e., combined Orthographic and Phonetic score is $\geq 70\%$).

<p>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.</p>			
<u>Orthographic Checklist</u>		<u>Phonetic Checklist</u>	
Y/N	<p>Do the names begin with different first letters?</p> <p><i>Note that even when names begin with different first letters, certain letters may be confused with each other when scripted.</i></p>	Y/N	<p>Do the names have different number of syllables?</p>
Y/N	<p>Are the lengths of the names dissimilar* when scripted?</p> <p><i>*FDA considers the length of names different if the names differ by two or more letters.</i></p>	Y/N	<p>Do the names have different syllabic stresses?</p>
Y/N	<p>Considering variations in scripting of some letters (such as <i>z</i> and <i>f</i>), is there a different number or placement of upstroke/downstroke letters present in the names?</p>	Y/N	<p>Do the syllables have different phonologic processes, such as vowel reduction, assimilation, or deletion?</p>
Y/N	<p>Is there different number or placement of cross-stroke or dotted letters present in the names?</p>	Y/N	<p>Across a range of dialects, are the names consistently pronounced differently?</p>
Y/N	<p>Do the infixes of the name appear dissimilar when scripted?</p>		
Y/N	<p>Do the suffixes of the names appear dissimilar when scripted?</p>		

Table 4: Moderately Similar Name Pair Checklist (i.e., combined score is $\geq 55\%$ to $\leq 69\%$).

Step 1	<p>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.</p> <p>For single strength products, also consider circumstances where the strength may not be expressed.</p> <p>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.</p> <p>To determine whether the strengths or doses are similar to your proposed product, consider the following list of factors that may increase confusion:</p> <ul style="list-style-type: none">• 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	<p>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.</p>

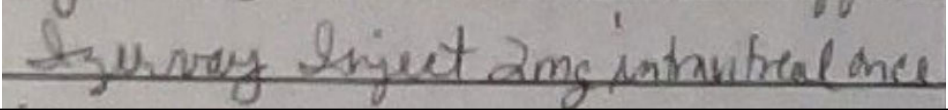
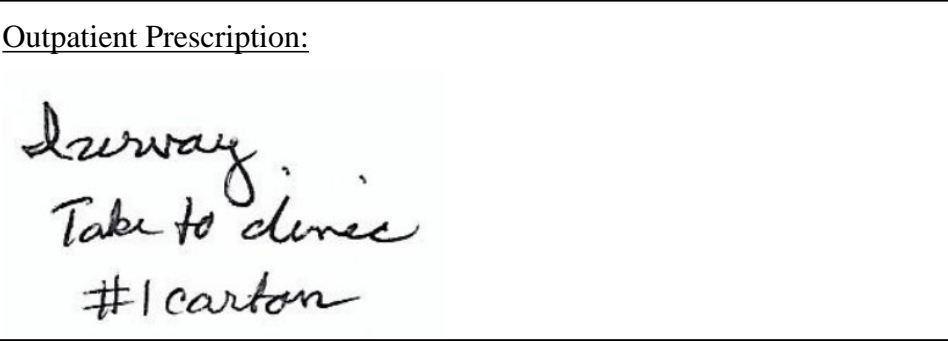
	<p>Orthographic Checklist (Y/N to each question)</p> <ul style="list-style-type: none"> • Do the names begin with different first letters? Note that even when names begin with different first letters, certain letters may be confused with each other when scripted. • Are the lengths of the names dissimilar* 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 <i>z</i> and <i>f</i>), 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? 	<p>Phonetic Checklist (Y/N to each question)</p> <ul style="list-style-type: none"> • Do the names have different number of syllables? • Do the names have different syllabic stresses? • Do the syllables have different phonologic processes, such as vowel reduction, assimilation, or deletion? • Across a range of dialects, are the names consistently pronounced differently?
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Table 5: Low Similarity Name Pair Checklist (i.e., combined score is ≤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. Izervay Study (Conducted on November 28, 2022)

Handwritten Medication Order/Prescription	Verbal Prescription
<p>Medication Order:</p> 	<p>Izervay</p> <p>Take to clinic.</p> <p>Dispense one carton.</p>
<p>Outpatient Prescription:</p> 	
<p>CPOE Study Sample (displayed as sans-serif, 12-point, bold font)</p> <p>Izervay</p>	

FDA Prescription Simulation Responses (Aggregate Report)

262 People Received Study
102 People Responded

Study Name: Izervay

Total	26	23	25	28	
INTERPRETATION	INPATIENT	CPOE	VOICE	OUTPATIENT	TOTAL
AZUVOY	1	0	0	0	1
HYZARBAY	0	0	1	0	1
HYZERVAY	0	0	2	0	2
ISARBAY	0	0	1	0	1
ISERVAE	0	0	1	0	1
ISERVAY	0	0	2	0	2
ISODAY	0	0	1	0	1
ISORVEY	0	0	1	0	1
ISURVEY	0	0	1	0	1

IURVAY	0	0	0	11	11
IURWAY	0	0	0	2	2
IZAVEY	0	0	1	0	1
IZERBEY	0	0	1	0	1
IZERVAIE	0	0	1	0	1
IZERVAY	6	23	4	3	36
IZERVEY	0	0	2	0	2
IZERVOY	4	0	0	0	4
IZERVOY INJECTION	1	0	0	0	1
IZERVY	0	0	1	1	2
IZIRBAY	0	0	0	1	1
IZIRVAY	0	0	0	6	6
IZIRVOY	1	0	0	0	1
IZORVEY	0	0	1	0	1
IZURVAY	2	0	0	3	5
IZURVEY	0	0	2	0	2
IZUVAY	4	0	0	0	4
IZUVDY	1	0	0	0	1
IZUVOY	5	0	0	0	5
IZYRVAE	0	0	1	0	1
LURVAY	0	0	0	1	1
SYIRVAY	1	0	0	0	1
TYZERVAY	0	0	1	0	1

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

No.	Proposed name: Izervay Established name: avacincaptad pegol Dosage form: Injection Strength(s): 2 mg/0.1 mL Usual Dose: 2 mg (0.1 mL of 20 mg/mL solution solution) administered by intravitreal injection once monthly (approximately every 28 ± 7 days)	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.	Izervay	100	Name is the subject of this review

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

No.	Name	POCA Score (%)
1.	N/A	

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

No.	Proposed name: Izervay Established name: avacincaptad pegol Dosage form: Injection Strength(s): 2 mg/0.1 mL Usual Dose: 2 mg (0.1 mL of 20 mg/mL solution solution) administered by intravitreal injection once monthly (approximately every 28 ± 7 days)	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.	Zerviate	69	This name pair has sufficient orthographic and phonetic differences.
2.	Servira	64	This name pair has sufficient orthographic and phonetic differences.
3.	Yervoy	64	Orthographically, the different first letters ('I' vs. 'Y') provides some orthographic difference. Phonetically, the first syllables (ahy vs. yur) and second syllables (zer vs. voi),

No.	Proposed name: Izervay Established name: avacincaptad pegol Dosage form: Injection Strength(s): 2 mg/0.1 mL Usual Dose: 2 mg (0.1 mL of 20 mg/mL solution solution) administered by intravitreal injection once monthly (approximately every 28 ± 7 days)	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
			<p>provide sufficient phonetic differences and Izervay contains an extra syllable.</p> <p>In addition to the orthographic and phonetic differences, there is no overlap in dose (2 mg vs. weight-based dose of 1 mg/kg, 3 mg/kg, or 10 mg/kg depending on the type of cancer being treated). Additionally, the routes of administration (intravitreal vs. intravenous infusion) are different, if included on a prescription order. Furthermore, use of Izervay will be limited to administration by trained ophthalmologist.</p> <p>When all the aforementioned mitigations are considered in totality, we find the risk of name confusion is adequately minimized in this case.</p>
4.	Tyrvaya	63	<p>This name pair has sufficient orthographic and phonetic differences.</p>
5.	Arzerra	58	<p>Orthographically, the downstroke of the letter ‘y’ vs. the letter ‘a’ in the seventh position of this name pair provides some orthographic difference.</p> <p>Phonetically, the first syllables (‘ahy’ vs. ‘ar’) and third syllables (‘vey’ vs. ‘uh’) provide sufficient phonetic differences.</p> <p>Additionally, the product characteristics between the name pair are different. Specifically, we note that</p>

No.	Proposed name: Izervay Established name: avacincaptad pegol Dosage form: Injection Strength(s): 2 mg/0.1 mL Usual Dose: 2 mg (0.1 mL of 20 mg/mL solution solution) administered by intravitreal injection once monthly (approximately every 28 ± 7 days)	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
			<p>the strength (2 mg/0.1 mL vs. 100 mg/5 mL and 1,000 mg/50 mL), dose (2 mg (0.1 mL) vs. 300 mg (15 mL), 1,000 mg (50 mL), or 2,000 mg (100 mL), and route of administration (intravitreal injection vs. intravenous infusion) differ.</p> <p>When the aforementioned mitigations are considered in totality, we find the risk for confusion is adequately minimized in this case.</p>
6.	Ivizia	58	This name pair has sufficient orthographic and phonetic differences.
7.	(b) (4) ***	58	This name pair has sufficient orthographic and phonetic differences.
8.	Exservan	57	This name pair has sufficient orthographic and phonetic differences.
9.	Oxervate	56	This name pair has sufficient orthographic and phonetic differences.
10.	(b) (4) ***	56	This name pair has sufficient orthographic and phonetic differences.
11.	Zerbaxa	56	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.	Serzone	54
2.	Zenra	52
3.	Aizea	48
4.	Rezivertinib	40
5.	Itracol	36
6.	Ircolon Forte	20

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.	Minerva	69	International product previously marketed in South Africa, Austria, Czech Republic, Hungary, Switzerland, France, India, and Netherlands.
2.	(b) (4) ***	68	(b) (4)
3.	Benerva	63	International product marketed in Mexico, Brazil, Italy, Greece, Belgium, France, Spain, and Switzerland. International product formerly marketed in Sweden, the United Kingdom, and Ireland.
4.	Ivercare	63	Veterinary product.
5.	Qizerz	63	International product marketed in Greece.
6.	Zervalx	63	Name identified in RxNorm database. Product is deactivated and no generic equivalents are available.
7.	Azurvig	62	International product marketed in Czech Republic and Bulgaria.
8.	Nirva	62	International product marketed in Czech Republic, Hungary, and Poland.
9.	Zertya	62	Name identified in the external name study submitted by the Applicant. Unable to find product characteristics in commonly used drug databases.
10.	Aservo	61	Veterinary product.
11.	Ikervis	61	International product marketed in Austria, Czech Republic, Denmark, Finland, France, Germany, Hong Kong, Ireland, Malaysia, Netherlands, Norway, Philippines, Poland, Singapore, Sweden, Switzerland, Thailand, and the United Kingdom.
12.	Xanirva	61	International product marketed in Hungary.

No.	Name	POCA Score (%)	Failure preventions
13.	Alzerta	60	International product marketed in Spain.
14.	Ezeatorva	60	Name identified in the external name study submitted by the Applicant. Unable to find product characteristics in commonly used drug databases.
15.	Inerta	60	International product marketed in Hungary.
16.	Inverma V	60	Name identified in the external name study submitted by the Applicant. Unable to find product characteristics in commonly used drug databases.
17.	Ivermax	60	Veterinary product.
18.	(b) (4) ***	60	(b) (4)
19.	Azarga	58	International product marketed in Chile, China, France, Greece, Italy, Malaysia, Mexico, Poland, Russia, South Africa, Singapore, Turkey, Ukraine, Argentina, Australia, Austria, Belgium, Canada, Czech Republic, Denmark, Finland, Germany, Hong Kong, Hungary, Ireland, Israel New Zealand, Netherlands, Norway, Philippines, Portugal, Spain, Sweden, Switzerland, Thailand, and the United Kingdom.
20.	Cezera	58	International product marketed in Netherlands.
21.	Ivercide	58	Veterinary product.
22.	Iverscab	58	Name identified in the external name study submitted by the Applicant. Unable to find product characteristics in commonly used drug databases.
23.	Iviverz	58	International product marketed in Poland. International product formerly marketed in Finland and Netherlands.
24.	(b) (4) ***	58	Proposed proprietary name for (b) (4) found unacceptable by DMEPA (OSE# (b) (4)). BLA 761224 approved under the proprietary name Tezspire.
25.	Izovag	57	International product marketed in Chile, France, and the United Kingdom.

No.	Name	POCA Score (%)	Failure preventions
26.	Zarvalor	57	International product marketed in Poland and Mexico.
27.	Atorval	56	International product marketed in Greece.
28.	Ipersart	56	International product marketed in South Africa, Austria, Czech Republic, Hungary, Switzerland, France, and India. International product formerly marketed in Netherlands.
29.	Ipertas	56	International product marketed in Philippines and France.
30.	Ivares	56	International product previously marketed in Poland.
31.	Iverhart	56	Veterinary product.
32.	Izinova	56	International product marketed in Netherlands and Spain.
33.	Lidervit	56	International product marketed in Spain.
34.	Parvati	56	Name identified in the external name study submitted by the Applicant. Unable to find product characteristics in commonly used drug databases.
35.	Thervan	56	International product marketed in Greece.
36.	Verv	56	Name identified in RxNorm database. Unable to find product characteristics in commonly used drug databases.
37.	Xerobase	56	International product marketed in Argentina.
38.	Zerpi	56	International product formerly marketed in Portugal.
39.	Ivergalen	55	International product previously marketed in Spain.
40.	Isoday	49	International product formerly marketed in Switzerland.

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

No.	Name	POCA Score (%)
1.	Xerava	64
2.	Zarvite	64
3.	Everissa	62

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

No.	Name	POCA Score (%)
4.	Viberzi	62
5.	Esertia	60
6.	Evertas	60
7.	Forvey	60
8.	(b) (4) ***	60
9.	Verdye	60
10.	Zirabev	60
11.	Firazyr	59
12.	Verdal	59
13.	Virazole	59
14.	Azi-Teva	58
15.	(b) (4) ***	58
16.	Certiva	58
17.	(b) (4) ***	58
18.	Hiperavia	58
19.	Laverdia	58
20.	Verzaide	58
21.	Videral	58
22.	Viperfav	58
23.	Virovir	58
24.	Zelvina	58
25.	Zirvin	58
26.	Zoryve	58
27.	Epi Vera E	57
28.	Ezaprev	57
29.	Pirver	57
30.	Zarzio	57
31.	(b) (4) ***	57
32.	Alerzina	56
33.	Atelvia	56
34.	Aviral	56
35.	Azedra	56
36.	Cetiriva	56
37.	Emirizia	56
38.	Enerdy	56
39.	Enzaver	56
40.	Eperzan	56
41.	(b) (4) ***	56
42.	Escertal	56
43.	Estreva	56
44.	Hiserpia	56
45.	Karvea	56
46.	Katerzia	56
47.	Levazyr	56

No.	Name	POCA Score (%)
48.	Overmag	56
49.	Revival	56
50.	Rezira	56
51.	(b) (4) ***	56
52.	Serzyl	56
53.	Silvera	56
54.	Sirkava	56
55.	Spiriva	56
56.	Terlivaz	56
57.	Veracer	56
58.	Verezana	56
59.	Verizina	56
60.	Verkazia	56
61.	Viralkey	56
62.	Virazid	56
63.	(b) (4) ***	56
64.	Biktarvy	55
65.	Edaravone	55
66.	Edarbi	55
67.	Emersal	55
68.	Enzira	55
69.	Eserina	55
70.	Ezevast	55
71.	Nilevar	55
72.	Rezavir	55
73.	Vercyte	55
74.	Verybel	55
75.	Virasal	55
76.	Viridal	55
77.	Vizitrav	55

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/s/

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