# CENTER FOR DRUG EVALUATION AND RESEARCH

***APPLICATION NUMBER:***

# 217242Orig1s000

# OTHER REVIEW(S)

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

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

# Memorandum

**Date:** 9/29/2023

**To:** Sascha Randolph, RPM, Division of Dermatology and Dentistry (DDD)
David Kettl, Clinical Team Leader
Hamid Tabatabai, MD, Clinical Reviewer

**From:** Montherson L Saint Juste, Regulatory Review Officer
Office of Prescription Drug Promotion (OPDP)

**CC:** James Dvorsky, Team Leader, OPDP

**Subject:** OPDP Labeling Comments for ZORYVE® (roflumilast) topical foam

**NDA**: 217242

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**Background:**

In response to DDD's consult request dated February 24, 2023, OPDP has reviewed the proposed Prescribing Information (PI), and carton and container labeling for the original NDA submission for ZORYVE® (roflumilast) topical foam.

**PI:**
OPDP's review of the proposed PI is based on the draft labeling accessed from SharePoint on September 15, 2023, and our comments are provided below.

A combined OPDP and Division of Medical Policy Programs (DMPP) review was completed for the proposed PPI/IFU, and comments were sent under separate cover on September 21, 2023.

**Carton and Container Labeling**:
OPDP's review of the proposed carton and container labeling is based on the draft labeling submitted by the sponsor to the electronic document room, and we do not have any comments at this time.

Thank you for your consult. If you have any questions, please contact Montherson L Saint Juste at Montherson.SaintJuste@fda.hhs.gov.

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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: | September 21, 2023 |
| To: | Sascha Randolph<br>Regulatory Project Manager<br>**Division of Dermatology and Dentistry (DDD)** |
| Through: | LaShawn Griffiths, MSHS-PH, BSN, RN<br>Associate Director for Patient Labeling<br>**Division of Medical Policy Programs (DMPP)** |
| From: | Ruth Mayrosh, PharmD<br>Senior Patient Labeling Reviewer<br>**Division of Medical Policy Programs (DMPP)**<br><br>Montherson L. Saint Juste, PharmD, MS<br>Regulatory Review Officer<br>**Office of Prescription Drug Promotion (OPDP)** |
| Subject: | Review of Patient Labeling: Patient Package Insert (PPI) and Instructions for Use (IFU) |
| Drug Name (established name): | ZORYVE (roflumilast) |
| Dosage Form and Route: | topical foam |
| Application Type/Number: | NDA 217242 |
| Applicant: | Arcutis Biotherapeutics, Inc. |

## 1 INTRODUCTION

On February 16, 2023, Arcutis Biotherapeutics, Inc. submitted for the Agency's review an original New Drug Application (NDA) 217242 for ZORVYE (roflumilast) topical foam. The proposed indication for ZORVYE (roflumilast) topical foam is for the topical treatment of seborrheic dermatitis in patient 9 years of age and older.

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 Dermatology and Dentistry (DDD) on March 1, 2023 and February 24, 2023, respectively, for DMPP and OPDP to review the Applicant's proposed Patient Package Insert (PPI) and Instructions for Use (IFU) for ZORVYE (roflumilast) topical foam.

DMPP conferred with the Division of Medication Error, Prevention, and Analysis (DMEPA) and a separate DMEPA review of the IFU was completed on July 10, 2023.

## 2 MATERIAL REVIEWED

- Draft ZORVYE (roflumilast) topical foam PPI and IFU received on February 16, 2023, revised by the Review Division throughout the review cycle, and received by DMPP and OPDP on September 15, 2023.
- Draft ZORVYE (roflumilast) topical foam Prescribing Information (PI) received on February 16, 2023, revised by the Review Division throughout the review cycle, and received by DMPP and OPDP on September 15, 2023.
- Approved ZORVYE (roflumilast) cream comparator labeling dated July 29, 2022.

## 3 REVIEW METHODS

To enhance patient comprehension, materials should be written at a 6$^{th}$ to 8$^{th}$ grade reading level, and have a reading ease score of at least 60%. A reading ease score of 60% corresponds to an 8$^{th}$ grade reading level. In our review of the PPI and IFU the target reading level is at or below an 8$^{th}$ grade 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 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 meet the criteria as specified in FDA's Guidance for Useful Written Consumer Medication Information (published July 2006)
- ensured that the PPI is consistent with the approved comparator labeling where applicable.

## 4 CONCLUSIONS

The PPI and IFU is 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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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: | July 10, 2023 |
| Requesting Office or Division: | Division of Dermatology and Dentistry (DDD) |
| Application Type and Number: | NDA 217242 |
| Product Name, Dosage Form, and Strength: | Zoryve (roflumilast) topical foam, 0.3% |
| Product Type: | Single Ingredient Product |
| Rx or OTC: | Prescription (Rx) |
| Applicant/Sponsor Name: | Arcutis Biotherapeutics, Inc. |
| FDA Received Date: | February 16, 2023 |
| TTT ID #: | 2023-3731 |
| DMEPA 1 Safety Evaluator: | Melina Fanari, R.Ph |
| DMEPA 1 Acting Team Leader: | Madhuri R. Patel, PharmD |

# 1 REASON FOR REVIEW

As part of the approval process for Zoryve (roflumilast) topical foam, the Division of Dermatology and Dentistry (DDD) requested that we review the proposed Zoryve prescribing information (PI), patient information (PPI), and Instructions for Use (IFU) for areas of vulnerability that may lead to medication errors.

## 1.1 BACKGROUND

Zoryve (roflumilast) topical cream 3% was approved on July 29, 2022, under NDA 215985 and is indicated for the treatment of plaque psoriasis, including intertriginous areas, in patients 12 years of age and older.

The same applicant, Arcutis, is currently proposing a new dosage form, topical foam, of roflumilast for review under NDA 217242 on February 16, 2023, the subject of this review. Arcutis proposes to market roflumilast topical foam 0.3% for the once daily topical treatment of seborrheic dermatitis in patients 9 years of age and older.

# 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 or ISMP Newsletters for our label and labeling reviews unless we are aware of medication errors through our routine postmarket safety surveillance

# 3 CONCLUSION AND RECOMMENDATIONS

The proposed IFU, container labels and carton labeling may be improved to promote the safe use of this product from a medication error perspective. We provide the identified medication error issues, our rationale for concern, and our proposed recommendations to minimize the risk for medication error in Section 4 for Arcutis.

## 4 RECOMMENDATIONS FOR ARCUTIS BIOTHERAPEUTICS, INC.

| Table 2. Identified Issues and Recommendations for Arcutis Biotherapeutics, Inc. (entire table to be conveyed to Applicant) | | | |
|---|---|---|---|
| | IDENTIFIED ISSUE | RATIONALE FOR CONCERN | RECOMMENDATION |
| Container Label and Carton Labeling | | | |
| 1. | The placement of the graphic at the beginning of the proprietary name competes with the legibility of the proprietary name, which may lead to misinterpretation of the proprietary name. | Placing a logo immediately before, within, or after the proprietary name can lead to misinterpretation because logos may look like an additional letter in the proprietary name or detract from legibility.<br><br>If logo is in the midst of the name, include this language as well. "Furthermore, see 21 CFR 201.10(a) which states that the ingredient information required by section 502(e) of the Federal Food, Drug, and Cosmetic Act shall appear together, without any intervening written, printed, or graphic matter, except the proprietary names of ingredients, which may be included with the listing of established names, and such statements that are specifically required for certain ingredients by the act or regulations in this chapter." | Delete, move, and/or decrease the prominence of the graphic at the beginning of the proprietary name. |
| IFU | | | |
| 1. | Step 2 requires clarification. | How to dispense, amount to be dispensed and location isn't stated. | Step 2 should include<br><br>1-how to dispense foam (i.e., press down on nozzle), 2-the amount of foam to dispense (i.e., small amount) and 3) location to dispense (i.e., palm of hand). |

APPENDICES: METHODS & RESULTS FOR EACH MATERIAL REVIEWED

APPENDIX A. PRODUCT INFORMATION/PRESCRIBING INFORMATION

Table presents relevant product information for Zoryve that Arcutis Biotherapeutics, Inc. submitted on February 16, 2023, and Zoryve (NDA 215985)[a].

| Table 4. Relevant Product Information for Zoryve (NDA 215985) and Zoryve | | |
|---|---|---|
| Product Name | Zoryve (NDA 215985) | Zoryve |
| Initial Approval Date | July 29, 2022 | N/A |
| Active Ingredient | roflumilast | roflumilast |
| Indication | treatment of plaque psoriasis, including intertriginous areas, in patients 12 years of age and older. | treatment of seborrheic dermatitis in patients 9 years of age and older. |
| Route of Administration | topical | topical |
| Dosage Form | topical cream | topical foam |
| Strength | 0.3% | 0.3% |
| Dose and Frequency | Apply once daily | Apply once daily |
| How Supplied | 60-g aluminum tubes | 60-g pressurized aluminum can |
| Storage | Store at 20°C to 25°C (68°F to 77°F); excursions permitted between 15°C and 30°C (59°F and 86°F). [See USP Controlled Room Temperature] | Store at 20°C to 25°C (68°F to 77°F); excursions permitted between 15°C and 30°C (59°F and 86°F). [See USP Controlled Room Temperature.]<br>Do not freeze. Store upright.<br>(b) (4) Flammable. (b) (4)<br>Contents under pressure. Do not puncture or incinerate. Do not expose to heat or store at temperatures above 49°C(120°F). |

[a] Zoryve [Prescribing Information]. Drugs@FDA. U.S. Food and Drug Administration. July 2022 [cited 2023 Jun 26]. Available from https://www.accessdata.fda.gov/drugsatfda_docs/label/2022/215985s000lbl.pdf

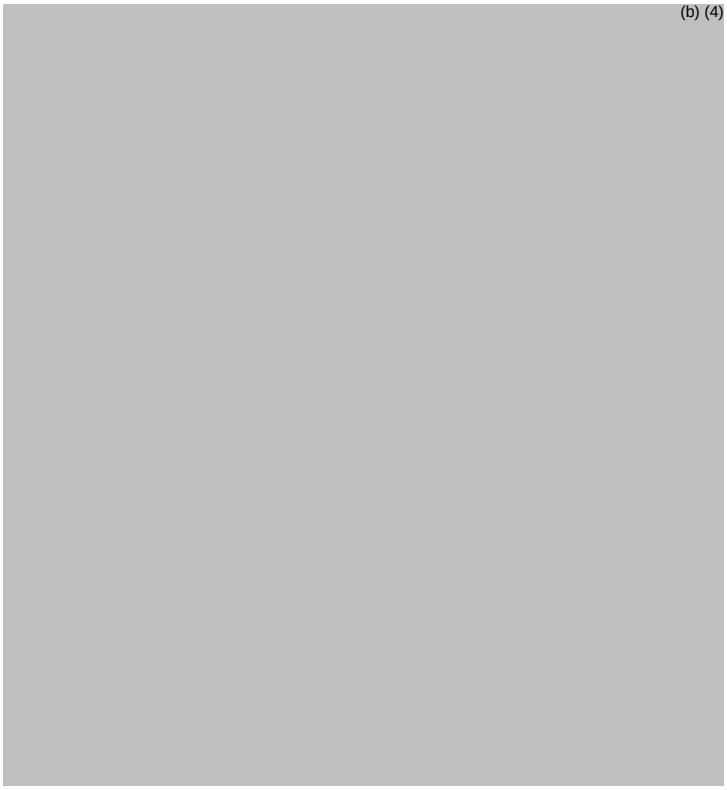
## APPENDIX F. LABELS AND LABELING

### F.1 List of Labels and Labeling Reviewed

Using the principles of human factors and Failure Mode and Effects Analysis,[b] along with postmarket medication error data, we reviewed the following Zoryve labels and labeling submitted by Arcutis Biotherapeutics, Inc..

- Container labels received on February 16, 2023
- Carton labeling received on February 16, 2023
- Prescribing Information, Patient Information, Instructions for Use (Images not shown) received on February 16, 2023, available from \\CDSESUB1\EVSPROD\nda217242\0001\m1\us\clean-draft-labeling-text.docx

### F.2 Label and Labeling Images




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



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