
PROPRIETARY NAME REVIEW

Division of Medication Error Prevention and Analysis 2 (DMEPA 2)
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, 2024
Application Type and Number:	BLA 761411
Product Name, Dosage Form, and Strength:	Niktimvo (axatilimab-csfr) ^a Injection, 50 mg/mL
Product Type:	Single Ingredient Product
Rx or OTC:	Prescription (Rx)
Applicant/Sponsor Name:	Incyte Corporation (Incyte)
PNR ID #:	2024-1044725733
DMEPA 2 Safety Evaluator:	Julie Neshiewat, PharmD, MS, BCPS, CPH
DMEPA 2 Team Leader:	Nicole Iverson, PharmD, BCPS
DMEPA 2 Associate Director for Nomenclature and Labeling:	Hina Mehta, PharmD

^a The nonproprietary name, axatilimab-csfr, was found conditionally acceptable on June 05, 2024.

Table of Contents

1	INTRODUCTION	3
1.1	REGULATORY HISTORY	3
1.2	PRODUCT INFORMATION	3
2	Discussion	4
2.1	MISBRANDING ASSESSMENT	4
2.2	SAFETY ASSESSMENT	4
2.2.1	United States Adopted Names (USAN) Search	4
2.2.2	Components of the Proposed Proprietary Name	4
2.2.3	Comments from Other Review Disciplines at Initial Review	5
2.2.4	FDA Prescription Simulation Studies	5
2.2.5	Phonetic and Orthographic Computer Analysis (POCA) Search Results	6
2.2.6	Names Retrieved for Review Organized by Name Pair Similarity	6
2.2.7	Safety Analysis of Names with Potential Orthographic, Spelling, and Phonetic Similarities	6
2.2.8	Communication of DMEPA's Determination	6
3	CONCLUSION	6
3.1	Comments to Incyte Corporation	7
4	REFERENCES	8
5	APPENDICES	9

1 INTRODUCTION

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

1.1 REGULATORY HISTORY

Incyte previously submitted the proposed proprietary name, (b) (4) *** under IND 139019 and BLA 761411 on September 30, 2022 and December 28, 2023, respectively. However, on March 22, 2024, we found the name, (b) (4) *** unacceptable (b) (4) .^c

Thus, Incyte submitted the proposed proprietary name, Niktimvo, for review on April 16, 2024 under BLA 761411.

1.2 PRODUCT INFORMATION

The following product information is provided in the proprietary name submission received on April 16, 2024^d, the Prescribing Information received on December 28, 2023^e, and the applicant's response to an Information Request providing updated dosing received on May 14, 2024^f.

Table 1. Relevant Product Information for Niktimvo	
Intended pronunciation:	nik tim' voe
Nonproprietary name:	axatilimab-csfr
Indication:	treatment of adult and pediatric patients (b) (4) with chronic graft-versus-host disease (cGVHD) after failure of at least two prior lines of systemic therapy
Dosage Form:	Injection

^b Proprietary Name Safety Summary for Niktimvo. Miami (FL): (b) (4); 2024 APR 16. Available from: <\\CDSESUB1\EVSPROD\bla761411\0017\m1\us\118-proprietary-names\request-proprietary-name.pdf>.

^c Kundreskas, J. Proprietary Name Review for (b) (4) *** (IND 139019 and BLA 761411). Silver Spring (MD): FDA, CDER, OSE, DMEPA 2 (US); 2024 MAR 22. PNR ID No. 2022-1044724783 and 2023-1044725542.

^d Request for Proprietary Name Review for Niktimvo (axatilimab) injection (BLA 761411). Wilmington (DE): Incyte Corporation; 2024 APR 16. Available from: <\\CDSESUB1\EVSPROD\bla761411\0017\m1\us\118-proprietary-names\request-proprietary-name.pdf>.

^e Proposed prescribing information for (b) (4) ***. Wilmington (DE): Incyte Corporation; 2023 DEC 28. Available from: <\\CDSESUB1\EVSPROD\bla761411\0001\m1\us\114-labeling\draft\labeling\draft-labeling-text.pdf>. In the 2024 APR 16 submission for Niktimvo, the applicant referenced prescribing information with (b) (4) *** name submitted 2023 DEC 28.

^f Response to 07 May 2024 FDA Request for Clinical Information. Wilmington (DE): Incyte Corporation; 2024 MAY 14. Available from: <\\CDSESUB1\EVSPROD\bla761411\0024\m1\us\111-information-amendment\rir-07may2024.pdf>

Table 1. Relevant Product Information for Niktimvo	
Strength:	50 mg/mL
Route of administration:	Intravenous infusion
Dose and frequency:	Recommended Dosage and Dosage (b) (4) for Adverse Reactions
	Recommended Dosage
	0.3 mg/kg every 2 weeks
How Supplied:	Carton containing one single-dose vial of 50 mg/mL
Storage:	Store refrigerated at 2°C to 8°C (36°F to 46°F) in the original carton to protect from light. Do not freeze or shake.

2 DISCUSSION

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

2.1 MISBRANDING ASSESSMENT

The Office of Prescription Drug Promotion (OPDP) determined that Niktimvo would not misbrand the proposed product. The Division of Medication Error Prevention and Analysis 2 (DMEPA 2) concurred with the findings of OPDP's assessment for Niktimvo. The Division of Hematologic Malignancies 1 (DHM 1) concurred with the findings of OPDP's assessment for Niktimvo.

2.2 SAFETY ASSESSMENT

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

2.2.1 UNITED STATES ADOPTED NAMES (USAN) SEARCH

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

2.2.2 COMPONENTS OF THE PROPOSED PROPRIETARY NAME

Incyte did not provide a derivation or intended meaning for the proposed proprietary name, Niktimvo, in their submission. This proprietary name is comprised of a single word that contains the letter string "IM" and "VO", which are medical abbreviations for "intramuscular" and "verbal order", respectively. Although we typically discourage the inclusion of medical abbreviations in proprietary names, we determined that the location of the abbreviation "IM"

^g USAN stem search conducted on May 2, 2024.

in the middle of the proposed name Niktimvo makes it unlikely for the “IM” letter string to be separated from the surrounding letters in a manner that could lead to confusion in this case. Thus, we do not object to the inclusion of the “IM” letter string in this case.

As the letter string “VO” is located at the end of the name, we evaluated the potential risk of misinterpreting the proposed proprietary name Niktimvo as “[drug name similar to Niktim] vo”. We acknowledge that there is an international product Nilstim, which could look similar to “Niktim”.^h However, since Nilstim is an international product marketed in the United Kingdom, the risk of name confusion is adequately minimized in this case (Appendix G).

Beyond these abbreviations, we note that Niktimvo does not contain any other additional components (e.g., a modifier, route of administration, dosage form) that are misleading or can contribute to medication error.

2.2.3 COMMENTS FROM OTHER REVIEW DISCIPLINES AT INITIAL REVIEW

On May 17, 2024, the Division of Hematologic Malignancies 1 (DHM 1) did not forward any comments or concerns relating to Niktimvo at the initial phase of the review.

2.2.4 FDA PRESCRIPTION SIMULATION STUDIES

Eighty-four (84) practitioners participated in DMEPA’s prescription simulation studies for Niktimvo. One participant in the voice study misinterpreted Niktimvo as “Nicotimvo”, which is a close variation to the currently marketed product “Nicotinum”.

We further evaluated the name pair Niktimvo vs. Nicotinum below for risk of medication errors.

Niktimvo vs. Nicotinum

Orthographically, Niktimvo contains two upstroke letters ‘k’ and ‘t’ in the third and fourth position, whereas Nicotinum contains the upstroke letter ‘t’ in the fifth position, which gives the names different shapes when scripted. Additionally, the ending of the suffix ‘-o’ vs. ‘-m’ provide some orthographic difference.

Phonetically, the second (‘-tim-’ vs. ‘-co-’) and third syllables (‘-vo’ vs. ‘-tin-’) sound different. In addition, Niktimvo has three syllables and Nicotinum has four syllables.

We acknowledge the name pair are single strength products which may be omitted on a prescription (50 mg/mL vs. 6X for the liquid dosage form or 30 C for the pellet dosage form) and have numerical overlap in dose (5 mg vs. 5 drops for the liquid dosage form or 5 pellets for the pellet dosage form). However, Nicotinum is available in two dosage forms (liquid and pellets), which would need to be specified on a prescription and does not overlap with the injection dosage form of Niktimvo. The products also differ in route of administration (intravenous vs. oral) and frequency of administration (every 2 weeks vs. three times daily), which may provide additional differentiation.

^h POCA search conducted on May 2, 2024 in version 5.8.

Thus, the risk of name confusion is minimized in this case (See Appendix E).

The remaining responses did not overlap with any currently marketed products nor did the responses sound or look similar to any currently marketed products or any products in the pipeline. Appendix B contains the results from the prescription simulation studies.

2.2.5 PHONETIC AND ORTHOGRAPHIC COMPUTER ANALYSIS (POCA) SEARCH RESULTS

Our POCA searchⁱ identified 23 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 2 below.

2.2.6 NAMES RETRIEVED FOR REVIEW ORGANIZED BY NAME PAIR SIMILARITY

Table 2 provides the number of names retrieved from our POCA search, FDA Prescription Simulation Study, and (b) (4) external study. These name pairs are organized as highly similar, moderately similar, or low similarity for further evaluation.

Table 2. 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 $\leq 69\%$	21
Low similarity name pair: combined match percentage score $\leq 54\%$	4

2.2.7 SAFETY ANALYSIS OF NAMES WITH POTENTIAL ORTHOGRAPHIC, SPELLING, AND PHONETIC SIMILARITIES

Our analysis of the 26 names contained in Table 2 determined none of the names will pose a risk for confusion with Niktimvo as described in Appendices C through H.

2.2.8 COMMUNICATION OF DMEPA'S DETERMINATION

On July 9, 2024, DMEPA 2 communicated our determination to the Division of Hematologic Malignancies 1 (DHM 1).

3 CONCLUSION

The proposed proprietary name, Niktimvo, is conditionally acceptable.

ⁱ POCA search conducted on May 2, 2024 in version 5.8.

3.1 COMMENTS TO INCYTE CORPORATION

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

If any of the proposed product characteristics as stated in your submission, received on April 16, 2024 are altered prior to approval of the marketing application, the proprietary name must be resubmitted for review.

4 REFERENCES

1. *United States Adopted Names (USAN) Stems*

USAN Stems List contains all the recognized USAN stems, available at <https://www.ama-assn.org/about/united-states-adopted-names/united-states-adopted-names-approved-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 <https://www.fda.gov/drugs/drug-approvals-and-databases/drugsfda-glossary-terms>).

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>).

Purple Book

The Purple Book is an online database that contains information about biological products, including biosimilar and interchangeable biological products, licensed (approved) by the FDA under the Public Health Service (PHS) Act. See Purple Book: Lists of Licensed Biological Products with Reference Product Exclusivity and Biosimilarity or Interchangeability Evaluations, available at <https://www.fda.gov/drugs/therapeutic-biologics-applications-bla/purple-book-lists-licensed-biological-products-reference-product-exclusivity-and-biosimilarity-or>.

Division of Medication Errors Prevention and Analysis pending proprietary name requests

This is a list of proposed and pending names that is generated by the Division of Medication Error Prevention and Analysis.

5 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, the Office of Prescription Drug Promotion (OPDP) assesses the name for misbranding concerns. For over-the-counter (OTC) drug products, the misbranding assessment of the proposed name is conducted by the Office of Non-Prescription Drugs (ONPD). OPDP or ONPD 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 ONPD 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 3*. 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.^j

*Table 3. 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.

^j National Coordinating Council for Medication Error Reporting and Prevention. <https://www.nccmerp.org/about-medication-errors>. Last accessed 10/05/2020.

*Table 3. 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 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, Cerner RxNorm, Purple Book, 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 4-6) 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 4).
- Moderately similar names are further evaluated to identify the presence of attributes that are known to cause name confusion.
 - o 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^k. 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.

- o 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 5).
 - Names with low similarity that have no overlap or similarity in strength and dose are generally acceptable (See Table 6) 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.
- c. FDA Prescription Simulation Studies: DMEPA also conducts 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), Office of Generic Drugs (OGD), and/or Office of Pharmaceutical Quality (OPQ) 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-

^k Shah, M, Merchant, L, Characteristics That May Help in the Identification of Potentially Confusing Proprietary Drug Names. Therapeutic Innovation & Regulatory Science, September 2016

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 OPQ 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 Safety Evaluator 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 4. Highly Similar Name Pair Checklist (i.e., combined Orthographic and Phonetic score is $\geq$ 70%).			
Answer the questions in the checklist below. Affirmative answers to some of these questions suggest that the pattern of orthographic or phonetic differences in the names may render the names less likely to confusion, provided that the pair does not share a common strength or dose.			
Orthographic Checklist		Phonetic Checklist	
Y/N	Do the names begin with different first letters? <i>Note that even when names begin with different first letters, certain letters may be confused with each other when scripted.</i>	Y/N	Do the names have different number of syllables?
Y/N	Are the lengths of the names dissimilar* when scripted? <i>*FDA considers the length of names different if the names differ by two or more letters.</i>	Y/N	Do the names have different syllabic stresses?
Y/N	Considering variations in scripting of some letters (such as z and f), is there a different number or placement of upstroke/downstroke letters present in the names?	Y/N	Do the syllables have different phonologic processes, such vowel reduction, assimilation, or deletion?
Y/N	Is there different number or placement of cross-stroke or dotted letters present in the names?	Y/N	Across a range of dialects, are the names consistently pronounced differently?
Y/N	Do the infixes of the name appear dissimilar when scripted?		
Y/N	Do the suffixes of the names appear dissimilar when scripted?		

Table 5: Moderately Similar Name Pair Checklist (i.e., combined score is $\geq 55\%$ to $\leq 69\%$).		
Step 1	Review the DOSAGE AND ADMINISTRATION and HOW SUPPLIED/STORAGE AND HANDLING sections of the prescribing information (or for OTC drugs refer to the Drug Facts label) to determine if strengths and doses of the name pair overlap or are very similar. Different strengths and doses for products whose names are moderately similar may decrease the risk of confusion between the moderately similar name pairs. Name pairs that have overlapping or similar strengths or doses have a higher potential for confusion and should be evaluated further (see Step 2). Because the strength or dose could be used to express an order or prescription for a particular drug product, overlap in one or both of these components would be reason for further evaluation. For single strength products, also consider circumstances where the strength may not be expressed. For any i.e., drug products comprised of more than one active ingredient, consider whether the strength or dose may be expressed using only one of the components. To determine whether the strengths or doses are similar to your proposed product, consider the following list of factors that may increase confusion: • Alternative expressions of dose: 5 mL may be listed in the prescribing information, but the dose may be expressed in metric weight (e.g., 500 mg) or in non-metric units (e.g., 1 tsp, 1 tablet/capsule). Similarly, a strength or dose of 1000 mg may be expressed, in practice, as 1 g, or vice versa. • Trailing or deleting zeros: 10 mg is similar in appearance to 100 mg which may potentiate confusion between a name pair with moderate similarity. • Similar sounding doses: 15 mg is similar in sound to 50 mg	
Step 2	Answer the questions in the checklist below. Affirmative answers to some of these questions suggest that the pattern of orthographic or phonetic differences in the names may reduce the likelihood of confusion for moderately similar names with overlapping or similar strengths or doses.	
	Orthographic Checklist (Y/N to each question) • Do the names begin with different first letters? • Note that even when names begin with different first letters, certain letters may be confused with each other when scripted. • Are the lengths of the names dissimilar* when scripted? • *FDA considers the length of names different if the names differ by two or more letters. • Considering variations in scripting of some letters (such as z and f), is there a different number or	Phonetic Checklist (Y/N to each question) • Do the names have different number of syllables? • Do the names have different syllabic stresses? • Do the syllables have different phonologic processes, such vowel reduction, assimilation, or deletion? • Across a range of dialects, are the names consistently pronounced differently?

Table 5: Moderately Similar Name Pair Checklist (i.e., combined score is $\geq 55\%$ to $\leq 69\%$).

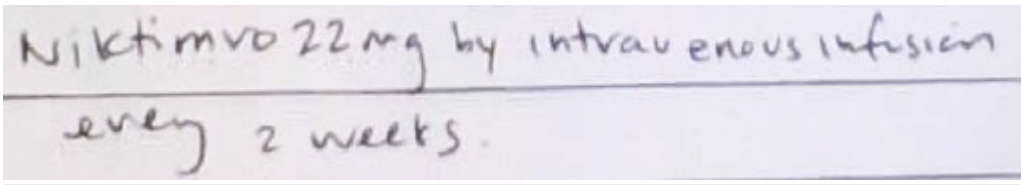
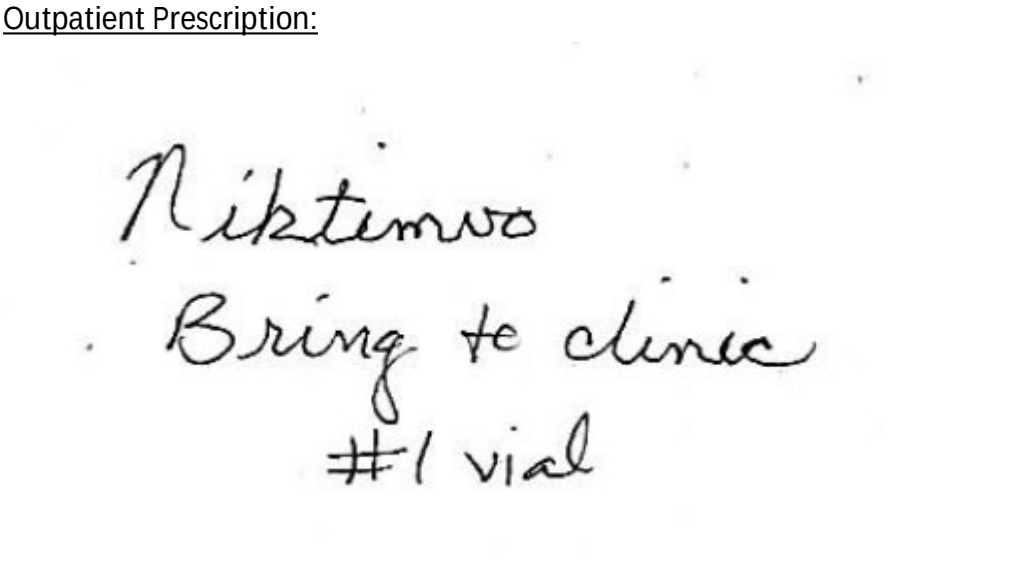
	placement of upstroke/downstroke letters present in the names? • Is there different number or placement of cross-stroke or dotted letters present in the names? • Do the infixes of the name appear dissimilar when scripted? • Do the suffixes of the names appear dissimilar when scripted?	
--	--	--

Table 6. Low Similarity Name Pair Checklist (i.e., combined score is $\leq 54\%$).

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. Niktimvo Study (Conducted on 4/26/2024)

Handwritten Medication Order Prescription	Verbal Prescription
<u>Medication Order:</u> 	Niktimvo Bring to clinic Dispense one vial
<u>Outpatient Prescription:</u> 	
CPOE Study Sample (displayed as sans-serif, 12-point, bold font) Niktimvo	

FDA Prescription Simulation Responses (Aggregate Report)					
Study Name: Niktimvo					
People Received Study: 190					
People Responded: 84					
Total	23	25	14	22	84
INTERPRETATION	INPATIENT	OUTPATIENT	VOICE	CPOE	TOTAL
NECATIMVO	0	0	1	0	1
NEKTIMVO	0	0	2	0	2
NEPTIMVO	0	0	1	0	1

NICITIMVO	0	0	1	0	1
NICKTIMVO	0	0	1	0	1
NICOTIMVO	0	0	1	0	1
NICTEMVO	0	0	1	0	1
NICTIMVO	0	0	3	0	3
NICTINVO	0	0	1	0	1
NIKTIMITO	0	1	0	0	1
NIKTIMRO	1	0	0	0	1
NIKTIMVIO	0	1	0	0	1
NIKTIMVO	22	23	2	22	69

APPENDIX C. HIGHLY SIMILAR NAMES (e.g., combined POCA score is ≥70%)

No.	Proposed name: Niktimvo Pronunciation: nik tim' voe Established name: axatilimab-csfr Dosage form: Injection Strength(s): 50 mg/mL Dosage: 0.3 mg/kg every 2 weeks. Dose modifications: (b) (4)	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.	Niktimvo	100	This name is the subject of this review.

APPENDIX D. MODERATELY SIMILAR NAMES (e.g., combined POCA score is ≥55% to ≤69%) with no overlap or numerical similarity in Strength and/or Dose – Not Applicable

APPENDIX E. MODERATELY SIMILAR NAMES (e.g., combined POCA score is ≥55% to ≤69%) with overlap or numerical similarity in Strength and/or Dose

No.	Proposed name: Niktimvo Pronunciation: nik tim' voe Established name: axatilimab-csfr Dosage form: Injection Strength(s): 50 mg/mL Dosage: 0.3 mg/kg every 2 weeks. Dose modifications: (b) (4)	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.	Noctiva	66	Orthographically, Niktimvo contains the dotted letter 'i' and upstroke letter 'k' in the prefix while Noctiva does not contain a dotted letter or upstroke letter in the prefix which provides some difference. Niktimvo also contains the additional rounded letter 'm' in the infix, which is not seen in Noctiva providing some orthographic difference.

No.	Proposed name: Niktimvo Pronunciation: nik tim' voe Established name: axatilimab-csfr Dosage form: Injection Strength(s): 50 mg/mL Dosage: 0.3 mg/kg every 2 weeks. Dose modifications: (b) (4)	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
			Phonetically, the vowel sound in the prefix (Nik vs Noc) provides some difference. Additionally, the ending of the second (-tim- vs. -ti-) and third (-vo vs. -va) syllables sound different. There is no direct overlap in strength (50 mg/mL vs. 0.83 mcg/0.1 mL and 1.66 mcg/0.1 mL), and since Noctiva is available in multiple strengths, a strength must be provided on a prescription. The products also differ in dosage form (injection vs. nasal spray), route of administration (intravenous vs. intranasal), and frequency of administration (every 2 weeks vs. once daily before bedtime), which may provide additional differentiation. Thus, the risk of name confusion is minimized in this case.
2.	Anktiva	64	Orthographically, Niktimvo contains the dotted letter 'i' in the second position while Anktiva contains the rounded letter 'n' in the second position which provides some difference. Niktimvo also contains the additional letter 'm' in the infix, providing some orthographic difference. This name pair has sufficient phonetic differences.

No.	Proposed name: Niktimvo Pronunciation: nik tim' voe Established name: axatilimab-csfr Dosage form: Injection Strength(s): 50 mg/mL Dosage: 0.3 mg/kg every 2 weeks. Dose modifications: (b) (4)	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
			We acknowledge the name pair are single strength products which may be omitted on a prescription (50 mg/mL vs. 400 mcg/0.4 mL); however, the products do not have a direct overlap in dose (0.3 mg/kg vs. 400 mcg) and differ in route of administration (intravenous vs. intravesical), which may provide additional differentiation. Thus, the risk of name confusion is minimized in this case.
3.	Mektovi	64	Orthographically, Niktimvo contains the dotted letter 'i' in the second and fifth position while Mektovi contains the dotted letter 'i' in the seventh position which provides some difference. Niktimvo also contains the additional letter 'm' in the infix, providing some orthographic difference. This name pair has sufficient phonetic differences. We acknowledge the name pair are single strength products which may be omitted on a prescription (50 mg/mL vs. 15 mg); however, the products differ in dosage form (injection vs. tablets), route of administration (intravenous vs. oral),

No.	Proposed name: Niktimvo Pronunciation: nik tim' voe Established name: axatilimab-csfr Dosage form: Injection Strength(s): 50 mg/mL Dosage: 0.3 mg/kg every 2 weeks. Dose modifications: (b) (4)	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
			and frequency of administration (every 2 weeks vs. twice daily), which may provide additional differentiation. Thus, the risk of name confusion is minimized in this case.
4.	Nicotinum	64	See Section 2.2.4.
5.	Nexium Iv	60	This name pair has sufficient orthographic and phonetic differences.
6.	Nitetime	58	This name pair has sufficient orthographic and phonetic differences.
7.	Nikzon	57	This name pair has sufficient orthographic and phonetic differences.
8.	Biktarvy	56	This name pair has sufficient orthographic and phonetic differences.
9.	Nitro Iv	56	This name pair has sufficient orthographic and phonetic differences.
10.	Nioxin	55	This name pair has sufficient orthographic and phonetic differences.

APPENDIX F: LOW SIMILARITY NAMES (e.g., combined POCA score is ≤54%)

No.	Name	POCA Score (%)
1.	Initio	54
2.	Dextenza	45
3.	Nimbex	44
4.	Tymlos	36

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.	Nilstim	61	International product marketed in the United Kingdom. See Section 2.2.2.
2.	Noctamid	61	International product marketed in Germany, Belgium, New Zealand, and Switzerland, and formerly marketed in Italy, Austria, Greece, Netherlands, Ireland, and Portugal.
3.	(b) (4) ***	59	(b) (4)
4.	Nitoman	57	International product marketed in Canada, Denmark, Germany, Ireland, and Spain, and formerly marketed in Norway, United Kingdom, and Australia.
5.	(b) (4) ***	56	Proposed proprietary name for IND 121062 found conditionally acceptable (OSE # 2021-1044724099 dated April 14, 2021). However, the applicant withdrew the proposed proprietary name, (b) (4) ***, on July 28, 2021. NDA 214801 approved under the proprietary name Lytgovi.

APPENDIX H. Names not likely to be confused due to absence of attributes that are known to cause name confusion¹.

No.	Name	POCA Score (%)
1.	Mestinon	58
2.	Katinko	56
3.	Micatin	56
4.	Typhim Vi	56
5.	Zokinvy	56
6.	(b) (4) ***	55

¹ 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

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/

JULIE V NESHIEWAT
07/10/2024 07:42:18 AM

NICOLE F IVERSON
07/10/2024 07:54:12 AM

HINA S MEHTA
07/10/2024 02:08:12 PM

SUFFIX REVIEW FOR NONPROPRIETARY NAME

Division of Medication Error Prevention and Analysis 2 (DMEPA 2)
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:	6/3/2024
Responsible OND Division:	Division of Hematologic Malignancies 1 (DHM 1)
Application Type and Number:	BLA 761411
Product Name and Strength:	(axatilimab-csfr) injection, 50 mg/mL
Product Type:	Single Ingredient Product
Applicant/Sponsor Name:	Incyte Corporation (Incyte)
FDA Received Date:	December 28, 2023
Nexus NPNS ID #:	2023-225
DMEPA 2 Biologics Suffix Specialist:	Carlos M Mena-Grillasca, BS Pharm
DMEPA 2 Deputy Director:	Chi-Ming (Alice) Tu, PharmD

1 PURPOSE OF REVIEW

This review summarizes our evaluation of the four-letter suffixes proposed by Incyte for inclusion in the nonproprietary name and communicates our recommendation for the nonproprietary name for BLA 761411.

2 ASSESSMENT OF THE NONPROPRIETARY NAME

On December 28, 2023, Incyte submitted a list of 10 suffixes, in their order of preference, to be used in the nonproprietary name of their product^a. Incyte also provided findings from an external study conducted by (b) (4)^b, evaluating the proposed four-letter suffixes in conjunction with the nonproprietary name, for our consideration. Table 1 presents a list of suffixes submitted by Incyte:

Table 1. Suffixes submitted by Incyte***	
1.	csfr
2.	(b) (4)
3.	
4.	
5.	
6.	
7.	
8.	
9.	
10.	

^a Cover Letter – Request for Nonproprietary Name Suffix Review. Wilmington (DE): Incyte Corporation; 2023 Dec 28. Available from: [\\CDSESUB1\EVSPROD\bla761411\0003\m1\us\11-forms\356h.pdf](#)

^b Data Summary for Proposed Suffixes . (b) (4); 2023 Nov 22. Available from: [\\CDSESUB1\EVSPROD\bla761411\0003\m1\us\118-proprietary-names\request-suffix-review.pdf](#)

We reviewed Incyte's proposed suffixes in the order of preference listed by Incyte, along with the supporting data they submitted, using the principles described in the applicable guidance.^a

2.1 axatilimab-csfr

Incyte's first proposed suffix, -csfr, is comprised of 4 distinct letters.

We determined that the proposed suffix -csfr, is not too similar to any other products' suffix designation, does not look similar to the names of other currently marketed products, that the suffix is devoid of meaning, does not include any abbreviations that could be misinterpreted, and does not make any misrepresentations with respect to safety or efficacy of this product.

3 COMMUNICATION OF DMEPA 2 ANALYSIS

These findings were shared with OPDP. On June 3, 2024, OPDP did not identify any promotional concerns that would render this proposed suffix unacceptable. We acknowledge OPDP's comment that the suffix 'csfr' may make representations about the product's mechanism of action. Axatilimab is a monoclonal antibody that binds with high affinity to colony stimulating factor-1 receptors (CSF-1R). However, DMEPA does not object to proposed suffixes that may connote the mechanism of action of the product. DMEPA 2 also communicated our findings to the Division of Hematologic Malignancies 1 (DHM 1) on June 3, 2024.

4 CONCLUSION

We find Incyte's proposed suffix -csfr acceptable and recommend the nonproprietary name axatilimab- csfr be used throughout the labels and labeling. DMEPA 2 will communicate our findings to the Applicant via letter.

4.1 Recommendations for Incyte Corporation

We find the nonproprietary name, axatilimab-csfr, conditionally acceptable for your proposed product. Should your 351(a) BLA be approved during this review cycle, axatilimab-csfr will be the proper name designated in the license. You should revise your proposed labels and labeling accordingly and submit the revised labels and labeling to your BLA for our review. However, please be advised that if your application receives a complete response, the acceptability of your proposed

^a Guidance for Industry: Nonproprietary Naming of Biological Products. 2017. Available from: <http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM459987.pdf>

suffix will be re-evaluated when you respond to the deficiencies. If we find your suffix unacceptable upon our re-evaluation, we will inform you of our findings.

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/

CARLOS M MENA-GRILLASCA
06/03/2024 03:21:40 PM

CHI-MING TU
06/03/2024 03:58:01 PM

PROPRIETARY NAME REVIEW

Division of Medication Error Prevention and Analysis 2 (DMEPA 2)
Office of Medication Error Prevention and Risk Management (OMEPRM)
Office of Surveillance and Epidemiology (OSE)
Center for Drug Evaluation and Research (CDER)

***** This document contains proprietary information that cannot be released to the public*****

Date of This Review:	March 22, 2024
Application Type and Number:	IND 139019 and BLA 761411
Product Name and Strength:	(b) (4) (axatilimab-xxxx) ^a Injection, 50 mg/mL
Product Type:	Single Ingredient Product
Rx or OTC:	Prescription (Rx)
Applicant/Sponsor Name:	Incyte Corporation (Incyte)
PNR ID #:	2022-1044724783 and 2023-1044725542
DMEPA 2 Safety Evaluator:	Jody Kundreskas, PharmD
DMEPA 2 Team Leader (Acting):	Nicole Iverson, PharmD, BCPS
DMEPA 2 Associate Director for Nomenclature and Labeling:	Hina Mehta, PharmD

20 Page(s) have been Withheld in Full as b4 (CCI/TS) immediately following this page

^a The non-proprietary name suffix for this product has not yet been determined; therefore, the placeholder axatilimab-xxxx is used throughout this review to refer to the non-proprietary name and suffix for this product.

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/

JODY K KUNDRESKAS
03/22/2024 09:37:47 AM

NICOLE F IVERSON
03/22/2024 09:53:10 AM

HINA S MEHTA
03/22/2024 10:15:38 AM