CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

218466Orig1s000

PROPRIETARY NAME REVIEW(S)

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:	December 12, 2023
Application Type and Number:	NDA 218466
Product Name and Strength:	Vijoice (alpelisib) oral pellets, 50 mg per packet
Product Type:	Single Ingredient Product
Rx or OTC:	Prescription (Rx)
Applicant/Sponsor Name:	Novartis Pharmaceuticals Corp. (Novartis)
PNR ID #:	2023-1055725343
DMEPA 2 Safety Evaluator:	Janine Stewart, PharmD
DMEPA 2 Team Leader:	Ashleigh Lowery, PharmD
DMEPA 2 Deputy Director:	Chi-Ming (Alice) Tu, PharmD, BCPS

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1 INTRODUCTION

This review evaluates the proposed proprietary name, Vijoice, 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. Novartis did not submit an external name study for this proposed proprietary name.

1.1 REGULATORY HISTORY

Vijoice (alpelisib) was originally approved on April 5, 2022 under NDA 215039 and is currently available as 50 mg, 125 mg, and 200 mg tablets.

Novartis submitted NDA 218466 for a proposed new oral pellet formulation of Vijoice. The proposed product is supplied in packets; the contents of which are to be sprinkled directly onto the tongue and swallowed with water or mixed with a beverage or soft food before administration. This proposed dosage form is intended to provide an alternative and to optimize treatment delivery for adult and pediatric patients who are prescribed Vijoice 50 mg.

On September 15, 2023, Novartis submitted the name, Vijoice, for our review under NDA 218466 for the newly proposed oral pellet formulation. In the Request for Proprietary Name Review, Novartis stated that study data supports that the 50 mg tablet dosage form and the proposed 50 mg oral pellet dosage form are bioequivalent in the fed state and therefore, interchangeable[a].

1.2 PRODUCT INFORMATION

The following product information is provided in the proprietary name submission received on September 15, 2023.

- Intended Pronunciation: Vi' joiz
- Active Ingredient: alpelisib
- Indication of Use: For the treatment of adult and pediatric patients 2 years of age and older with severe manifestations of PIK3CA-Related Overgrowth Spectrum (PROS) who require systemic therapy.
- Route of Administration: Oral
- Dosage Form: oral pellets
- Strength: 50 mg per packet
- Dose and Frequency:
    - Pediatric/adult patients prescribed Vijoice 50 mg: 50 mg taken orally once daily with food.

[a] Request for Proprietary Name Review for Vijoice (alpelisib) NDA 218466. 15 SEP 2023. Available at: \\CDSESUB1\EVSPROD\nda218466\0003\m1\us\req-comm.pdf

        - Note: Multiple packets of pellets should not be combined to achieve a VIJOICE dose of 125 mg or 250 mg.
- How Supplied: individual packets in a 28-count carton
- 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].

2 RESULTS

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

2.1 MISBRANDING ASSESSMENT

The Office of Prescription Drug Promotion (OPDP) determined that Vijoice 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 Vijoice. The Division of Oncology 2 (DO2) did not comment on the findings of OPDP's assessment for Vijoice.

2.2 SAFETY ASSESSMENT

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

2.2.1 United States Adopted Names (USAN) Search

There is no USAN stem present in the proposed proprietary name[b].

2.2.2 Components of the Proposed Proprietary Name

Novartis did not provide a derivation or intended meaning for the proposed proprietary name, Vijoice, in their submission. This proprietary name is comprised of a single word that does not contain any components (i.e., a modifier, route of administration, dosage form, etc.) that can contribute to medication error.

2.2.3 Comments from Other Review Disciplines at Initial Review

On September 28, 2023, the Division of Oncology 2 (DO2) did not forward any comments or concerns relating to Vijoice at the initial phase of the review.

2.2.4 Multiple Dosage Forms Under a Single Proprietary Name

The applicant has proposed to market two dosage forms, tablets and oral pellets, under the same proprietary name using a single Prescribing Information. We contacted Clinical Pharmacology via email on November 9, 2023 for their assessment of the data to determine whether the proposed Vijoice (alpelisib) oral pellet formulation is equivalent to the existing Vijoice tablet formulation on a milligram for milligram basis. Clinical Pharmacology informed us the applicant submitted clinical bioequivalence study data which demonstrated that the proposed 50 mg pellet formulation is equivalent to and interchangeable with the approved 50 mg tablet formulation.

[b] USAN stem search conducted on November 6, 2023.

The applicant did not submit bioequivalence study data support the use of multiple packets of oral pellets to achieve other approved tablet doses [redacted]. Thus we sent an information request (IR) to Novartis on December 4, 2023, requesting their rationale for their statement [redacted]. In their response to the IR sent via email,[c] Novartis stated:

> No data have been generated to support administration of multiple packets of granules. Patients who are prescribed doses higher than 50 mg [redacted] and have difficulties swallowing [tablets] whole have the option to prepare an oral suspension from the [tablets] as described within the approved Vijoice United States Prescribing Information.[d]

While no bioequivalence study data was submitted to support the use of [redacted], in internal communication with the Review Team, the Review Team did not identify a safety concern that would preclude the acceptability of the proposed name. The use of the proposed 50 mg packet for only the 50 mg dose can be managed via labels and labeling, and we will review the proposed NDA 218466 labels and labeling under a separate labels and labeling review.

Table 1 below compares the currently marketed capsule formulation and the proposed oral pellet formulation.

Table 1. Product Characteristics of Vijoice Tablets and Vijoice Oral Pellets

	Vijoice[e] (approved April 5, 2022)	**Vijoice (proposed)**
Application Number	NDA 215039	NDA 218466
Active Ingredient	alpelisib	
Indication	For the treatment of adult and pediatric patients 2 years of age and older with severe manifestations of PIK3CA-Related Overgrowth Spectrum (PROS) who require systemic therapy.	
Route of Administration	Oral	

[c] Ohlinger, K. Amendment to Request for Proprietary Name Review for Vijoice (NDA 218466). East Hanover (MNJ): Novartis Pharmaceuticals Corp.; 2023 DEC 06. Available from email.

[d] Vijoice. DailyMed. National Library of Medicine; November 2023. Available from https://dailymed.nlm.nih.gov/dailymed/getFile.cfm?setid=638069a4-aee0-46c9-9e21-54ad449c163c&type=pdf

[e] Vijoice. DailyMed. National Library of Medicine; November 2023. Available from https://dailymed.nlm.nih.gov/dailymed/getFile.cfm?setid=638069a4-aee0-46c9-9e21-54ad449c163c&type=pdf

Strength	Tablets: 50 mg, 125 mg, 200 mg	Oral Pellets: 50 mg per packet
Dose and Frequency	**Patients 2-17 years:** 50 mg once daily with food (maximum daily dose) **Patients ≥18 years:** 250 mg once daily with food (maximum daily dose) o First-dose reduction: 125 mg once daily o Second-dose reduction: 50 mg once daily	**Pediatric/adult patients prescribed Vijoice 50 mg***: 50 mg once daily with food.
	*Note: [redacted] (b) (4)	
Dosage Form	Tablets	Oral Pellets (proposed)
How Supplied	**250 mg daily dose:** Each carton contains 2 blister packs (56 tablets total). Each blister pack contains 28 tablets (14 tablets, 200 mg alpelisib per tablet and 14 tablets, 50 mg alpelisib per tablet) **125 mg daily dose:** Each carton contains 1 blister pack (28 tablets total). Each blister pack contains 28 tablets (28 tablets, 125 mg alpelisib per tablet) **50 mg daily dose:** Each carton contains 1 blister pack (28 tablets total). Each blister pack contains 28 tablets (28 tablets, 50 mg alpelisib per tablet)	28-count carton (each packet contains 50 mg alpelisib)
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]*.	

We note that the proposed dosage forms share the same active ingredient, route of administration, and frequency of administration. It is a common and accepted practice to have multiple dosage forms of an active ingredient managed under one proprietary name. Additionally, our routine postmarketing surveillance has not identified any signals attributed to name confusion involving Vijoice. We further acknowledge that, when marketing under the same proprietary name, the differences between the two dosage forms such as the different method of oral administration can be communicated and differentiated by labels and labeling.

Therefore, given the aforementioned considerations, we do not object to the Applicant's proposal to market the proposed product with the proprietary name, Vijoice.

2.2.5 Communication of DMEPA's Determination

On December 12, 2023, DMEPA 2 communicated our determination to the Division of Oncology 2 (DO2).

3 CONCLUSION

The proposed proprietary name, Vijoice, is conditionally acceptable.

If you have any questions or need clarifications, please contact CAPT Latonia Ford, OSE project manager, at 301-796-4901.

3.1 COMMENTS TO NOVARTIS PHARMACEUTICALS CORP.

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

If any of the proposed product characteristics as stated in your submission received on September 15, 2023 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. [f]

[f] 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. 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.

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/

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