CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

219016Orig1s000

OTHER REVIEW(S)

Division of Antivirals

REGULATORY PROJECT MANAGER LABELING REVIEW

Applications: NDA 202022/S-020 and NDA 202022/S-022, NDA 219016/Original 1

Name of Drug: Edurant (rilpivirine) 25 mg tablet and 2.5 mg tablet for oral suspension

Applicant: Janssen Products, LP

Labeling Reviewed

Submission Date: March 14, 2024

Receipt Date: March 14, 2024

Background and Summary Description:

On July 25, 2023, Janssen submitted a Prior approval efficacy supplement, to NDA 202022/S-20 to extend the current approved patient population to allow for the use of:

- rilpivirine (RPV) 25 mg tablet in HIV-1 infected ARV treatment-naïve pediatric patients (HIV-1 RNA ≤100,000 copies/mL) and virologically suppressed pediatric patients (HIV-1 RNA <50 copies/mL) who weigh 25 kg to less than 35 kg and
- rilpivirine (RPV) 2.5 mg tablet for oral suspension in HIV-1 infected ARV treatment-naïve pediatric patients (HIV-1 RNA ≤100,000 copies/mL) and virologically suppressed pediatric patients (HIV-1 RNA <50 copies/mL) who weigh 14 kg to less than 25 kg.

The supplement was submitted to fulfill the required pediatric study requirement and the Written Request issued on July 01, 2020, and amended on July 29, 2023 (amendment #1) and March 23, 2023 (Amendment #2) for rilpivirine.

Supplement #020 was administratively split into Supplement 20 which provides the data to support the use of the product in HIV-1 treatment-naive pediatric patients weighing at least 25 kg to less than 35 kg and Supplement 22, which updates the labeling with pharmacokinetic and safety data from HIV-1, virologically suppressed patients weighing 25 to less than 35 kg.

Janssen was notified that the new 2.5 mg tablet for oral suspension was considered a new dosage form and would require submission under a separate new drug application (NDA). Janssen submitted NDA 219016 for the new dosage form on September 15, 2023.

Reference ID: 5347756

NDA 219016 [redacted] (b) (4) Original 1 [redacted] (b) (4)

- NDA 219016/Original-1 provides data to support the use of Edurant PED rilpivirine 2.5 mg tablet for oral suspension for the treatment of HIV-1 infection in treatment-naïve pediatric patients ≥2 years of age and weighing at least 14 kg and less than 25 kg.

The following labeling review is applicable to NDA 202022/S-020 and S-022 and NDA 219016/Original 1.

The labeling received on March 14, 2024, was compared to the labeling that was approved under NDA 202022/S-19.

Review

General Changes: Throughout the labeling, formatting changes were made such as spacing, renumbering of Tables and grammatical edits.

Highlights of Prescribing Information • Addition of Edurant PED to heading and throughout highlights.
RECENT MAJOR CHANGES (RMC) This section was updated along with the Month and Year of the changes. • Indications and Usage, Treatment of HIV-1 in Treatment-Naïve Patients (1.1) • Dosage and Administration (2.1, 2.3, 2.4, 2.5) • Warnings and Precautions, Different Formulations Are Not Substitutable (5.6)
DOSAGE AND USAGE • New language added to support the use of Edurant in combination with other antiretroviral agents for “treatment-naïve patients 2 years of age and older and weighing at least 14kg” (i.e new patient population).
DOSAGE AND ADMINSTRATION • Table updated to include Edurant PED dosing in patients weighing 14 kg to less than 25 kg with language indicating dosage is based on body weight. • Addition of warning to not substitute Edurant tablets and Edurant PED tablets for oral suspension due to differing pharmacokinetic profiles.
DOSAGE FORMS AND STRENGTHS • Addition of Edurant PED dosage form and strength.
USE IN SPECIFIC POPULATIONS • Removal of lactation statement “Women infected with HIV should be instructed not to breast feed due to the potential for HIV transmission.”
Revision Date • Date updated to reflect when action taken
FULL PRESCRIBING INFORMATION: Table of Contents* • New subsections were added under DOSAGE AND ADMINISTRATION

- Under WARNINGS AND PRECAUTIONS, section 5.6 Different Formulations Are Not Substitutable.'
- Under CLINICAL STUDIES, section 14.4 was added.

FULL PRESCRIBING INFORMATION

1 INDICATIONS AND USAGE

1.1 Treatment of HIV-1 in Treatment-Naïve Patients

- Addition of Edurant PED
- Patient population updated to "2 years of age and older and weighing at least 14kg".

2 DOSAGE AND ADMINISTRATION

2.1 Overview of Different Dosage Forms

- Addition of **Overview of Different Dosage Forms** section describing Edurant and Edurant PED and the indicated patient population for each dosage form.
- Addition of language to not substitute Edurant tablets and Edurant PED tablets for oral suspension due to differing bioavailability.

2.2 Recommended Dosage in Treatment-Naïve Adult Patients

- Updated to distinguish adult patients from pediatric patients.

2.3 Recommended Dosage in Treatment-Naïve Pediatric Patients 2 Years of Age and Older and Weighing at least 14 kg

- Section and language added to support the use of Edurant in combination with other antiretroviral agents for treatment-naïve patients 2 years of age and older and weighing at least 14kg (i.e new patient population).
- Table 1 provides the dosing regimens for pediatric patients.

2.4 Preparation and Administration Instructions for EDURANT PED Only

- Section and language included to add instructions for preparing and administering Edurant PED.

2.5 Recommended Dosage During Pregnancy

- Addition of language for pediatric patients

3 DOSAGE FORMS AND STRENGTH

- Addition of Edurant PED dosage form and strength.

5 WARNINGS AND PRECAUTIONS

5.6 Different Formulations Are Not Substitutable

- Addition of warning to not substitute Edurant tablets and Edurant Ped tablets for oral suspension due to differing pharmacokinetic profiles on a mg-per-mg basis and bioavailability.

6 ADVERSE REACTIONS

6.1 Clinical Trials Experience

Clinical Trial Experience in Pediatric Patients

- Addition of results from study TMC278-C213 Cohort 2 and study TMC278HTX2002 conducted in pediatric subjects with HIV-1 infection weighing at least 16 kg (5 to less than 12 years of age).

8 USE IN SPECIFIC POPULATIONS

8.2	**Lactation** Risk Summary o Updated to include statement on the potential risks of breastfeeding for individuals with HIV-1 infection.
8.4	**Pediatric Use** o Addition of data from for studyTMC278-C213 Cohort 2 (treatment-naïve) and study TMC278HTX2002 (virologically-suppressed) conducted in pediatric subjects with HIV-1 infection. o Statement that safety and efficacy profile of Edurant and Edurant Ped in pediatric patients is comparable to that observed in adults.
11	**DESCRIPTION** o Addition of description of Edurant PED 2.5 mg tablets for oral suspension including active and inactive ingredients.
12	**CLINICAL PHARMACOLOGY**
12.3	**Pharmacokinetics** Absorption and Bioavailability o Subsection *Effects of Food on Oral Absorption* updated to include Edurant Ped 2.5 mg tablets. Specific Populations o Subsection *Pediatric Patients*, updated to include Edurant Ped. o Table 9 provides for the pharmacokinetics of Edurant and Edurant PED patients ≥6 to <18 years of age from study TMC278-C213. o Table 10 provides for the pharmacokinetics of Edurant and Edurant PED patients ≥2 to <18 years of age from study TMC278HTX2002.
12.4	**Microbiology** Resistance o Updated to include data from study TMC278-C213 for treatment-naïve HIV-1 infected pediatric patients.
13	**NONCLINICAL TOXICOLOGY**
13.1	**Carcinogenesis, Mutagenesis, Impairment of Fertility** o Addition of predicted exposures for pediatric patients 12 years of age and older and weighing greater than 32 kg as well as 2 to less than 12 years of age, weighing at least 14 kg.
14	**CLINICAL STUDIES**
14.4	**Treatment-Naïve Pediatric Subjects (2 to less than 12 Years of Age)** o Addition of new section to provide TMC278-C213 study results for pediatric patients 2 to less than 12 Years of Age.
16	**HOW SUPPLIED/STORAGE AND HANDLING** o Addition of Edurant PED 2.5 mg tablet and packaging description. o Addition of storage statement for Edurant PED.
17	**PATIENT COUNSELING INFORMATION** o Addition of statement to advise patients not substitute Edurant tablets and Edurant PED tablets for oral suspension due to differing pharmacokinetic profiles on a mg-per-mg basis and bioavailability.

○ Addition of statement that patients/caregivers should visually inspect tablets to verify correct formulation. ○ Addition of statement to inform patients and caregivers that Edurant Ped should be dispersed in drinking water and should not be crushed, chewed, or swallowed whole. ○ Lactation subsection updated to include statement on the potential risks of breastfeeding for individuals with HIV-1 infection.
PATIENT INFORMATION
Patient information was revised to align with new patient population and to include Edurant PED.
INSTRUCTIONS FOR USE
An Instructions for Use document was created for Edurant PED.

The changes reflect the changes that were negotiated by the review team. Please see the individual reviews for additional information

London Harrison	3/15/2024
Regulatory Project Manager	Date
Karen Winestock	3/15/2024
Chief, Project Management Staff	Date

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LONDON F HARRISON
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KAREN D WINESTOCK
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MEMORANDUM
REVIEW OF REVISED LABEL AND LABELING

Division of Medication Error Prevention and Analysis 1 (DMEPA 1)
Office of Medication Error Prevention and Risk Management (OMEPRM)
Office of Surveillance and Epidemiology (OSE)
Center for Drug Evaluation and Research (CDER)

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Date of This Review:	March 13, 2024
Requesting Office or Division:	Division of Antivirals (DAV)
Application Type and Number:	NDA 219016
Product Name, Dosage Form, and Strength:	Edurant Ped (rilpivirine) tablets for oral suspension, 2.5 mg
Applicant Name:	Janssen Products, LP
FDA Received Date:	March 12, 2024
TTT ID #:	2023-6394-2
DMEPA 1 Safety Evaluator:	Amy J. Bao, PharmD, MPH
DMEPA 1 Team Leader:	Yevgeniya Kogan, PharmD, BCSCP

Reference ID: 5345849

1 PURPOSE OF MEMORANDUM

Janssen Products, LP submitted revised container label and carton labeling received on March 12, 2024 for Edurant Ped. The Division of Antivirals (DAV) requested that we review the revised container label and carton labeling for Edurant Ped (Appendix A) to determine if they are acceptable from a medication error perspective. The revisions are in response to recommendations that we made during a previous label and labeling review.[a]

2 CONCLUSION

Janssen Products, LP implemented all of our recommendations and we have no additional recommendations at this time.

[a] Bao, A. Label and Labeling Review Memo for Edurant Ped (NDA 219016). Silver Spring (MD): FDA, CDER, OSE, DMEPA 1 (US); 2024 FEB 26. TTT ID: 2023-6394-1.

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

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

Memorandum

Date: March 5, 2024

To: London Harrison, Regulatory Project Manager
Division of Antivirals (DAV)

From: Wendy Lubarsky, Regulatory Review Officer
Office of Prescription Drug Promotion (OPDP)

CC: Sam Skariah, Team Leader, OPDP

Subject: OPDP Labeling Comments for EDURANT (rilpivirine) tablets, for oral use; EDURANT PED (rilpivirine) tablets, for oral suspension

NDA: 202022/S-020; 219016

Background:
In response to DAV's consult request dated September 27, 2023, OPDP has reviewed the proposed Prescribing Information (PI), Patient Package Insert (PPI), Instructions for Use (IFU), and carton and container labeling for the original NDA submission for Edurant PED, a proposed new dosage form.

In response to DAV's consult request dated August 25, 2023, OPDP has reviewed the proposed PI, PPI, IFU for S-020 for Edurant. This supplement proposes to expand the use of Edurant tablets to treatment-naïve pediatric patients weighing at least 25 kg to less than 35 kg for the treatment of HIV-1 infection.

PI/PPI/IFU:
OPDP's review of the proposed PI is based on the draft labeling emailed to OPDP on February 22, 2024, 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 March 5, 2024.

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 on February 22, 2024, and our comments are provided below.

Thank you for your consult. If you have any questions, please contact Wendy Lubarsky at (240) 402-7721 or wendy.lubarsky@fda.hhs.gov.

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/s/

WENDY R LUBARSKY
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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:	March 1, 2024
To:	London Harrison Regulatory Project Manager **Division of Antivirals (DAV)**
Through:	LaShawn Griffiths, MSHS-PH, BSN, RN Associate Director for Patient Labeling **Division of Medical Policy Programs (DMPP)** Barbara Fuller, RN, MSN, WOCN Team Leader, Patient Labeling **Division of Medical Policy Programs (DMPP)**
From:	Jessica Chung, PharmD, MS Patient Labeling Reviewer **Division of Medical Policy Programs (DMPP)** Wendy Lubarsky, PharmD Regulatory Review Officer **Office of Prescription Drug Promotion (OPDP)**
Subject:	Review of Patient Labeling: Patient Package Insert (PPI) and Instructions for Use (IFU)
Drug Name (established name); Dosage Form and Route; Application Type/Number; Supplement Number:	EDURANT (rilpivirine) tablets, for oral use NDA 202022/S-020 EDURANT PED (rilpivirine) tablets, for oral suspension; NDA 219016
Applicant:	Janssen Product, LP c/o Janssen Research & Development LLC

1 INTRODUCTION

On July 25, 2023, Janssen Product, LP c/o Janssen Research & Development LLC submitted for the Agency's review a Prior Approval Supplement (PAS) – Efficacy to their approved New Drug Application (NDA) 202022/S-020 for EDURANT (rilpivirine) tablets. With this submission, the Applicant proposes to expand the use of EDURANT (rilpivirine) tablets to treatment-naïve pediatric patients weighing at least 25 kg to less than 35 kg for the treatment of HIV-1 infection.

On September 15, 2023, the Applicant submitted for the Agency's review an original New Drug Application (NDA) 219016 for EDURANT PED (rilpivirine) tablets, for oral suspension to propose a new a dosage form.

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 Antivirals (DAV) on August 25, 2023 for NDA 202022/S-020 and September 27, 2023 for NDA 219016, for DMPP and OPDP to review the Applicant's proposed Patient Package Insert (PPI) for EDURANT (rilpivirine) tablets and EDURANT PED (rilpivirine) tablets for oral suspension, and Instructions for Use (IFU) for EDURANT PED (rilpivirine) tablets for oral suspension.

DMPP conferred with the Division of Medication Error, Prevention, and Analysis (DMEPA) and a separate DMEPA review of the IFU was completed February 14, 2024.

2 MATERIAL REVIEWED

- Draft EDURANT (rilpivirine) tablets and EDURANT PED (rilpivirine) tablets for oral suspension PPI received on July 25, 2023 and September 15, 2023, and received by DMPP and OPDP on February 20, 2024 and February 22, 2024.
- Draft EDURANT PED (rilpivirine) tablets for oral suspension IFU received on July 25, 2023 and September 15, 2023, and received by DMPP and OPDP on February 20, 2024 and February 22, 2024.
- Draft EDURANT (rilpivirine) tablets and EDURANT PED (rilpivirine) tablets for oral suspension Prescribing Information (PI) received on July 25, 2023 and September 15, 2023, revised by the Review Division throughout the review cycle, and received by DMPP and OPDP on February 20, 2024 and February 22, 2024.

3 REVIEW METHODS

To enhance patient comprehension, materials should be written at a 6th to 8th grade reading level, and have a reading ease score of at least 60%. A reading ease score of 60% corresponds to an 8th grade reading level. In our review of the IFU the target reading level is at or below an 8th 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)

4 CONCLUSIONS

The PPI and IFU are acceptable with our recommended changes.

5 RECOMMENDATIONS

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

Please let us know if you have any questions.

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BARBARA A FULLER
03/05/2024 09:27:05 AM

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03/05/2024 09:34:21 AM

MEMORANDUM

REVIEW OF REVISED LABEL AND LABELING
Division of Medication Error Prevention and Analysis 1 (DMEPA 1)
Office of Medication Error Prevention and Risk Management (OMEPRM)
Office of Surveillance and Epidemiology (OSE)
Center for Drug Evaluation and Research (CDER)

Date of This Memorandum:	February 26, 2024
Requesting Office or Division:	Division of Antivirals (DAV)
Application Type and Number:	NDA 219016
Product Name, Dosage Form, and Strength:	Edurant Ped (rilpivirine) tablets for oral suspension, 2.5 mg
Applicant/Sponsor Name:	Janssen Products, LP
TTT ID #:	2023-6394-1
DMEPA 1 Safety Evaluator:	Amy J. Bao, PharmD, MPH
DMEPA 1 Team Leader:	Yevgeniya Kogan, PharmD, BCSCP

1 PURPOSE OF MEMORANDUM

The Applicant submitted revised container label and carton labeling received on February 22, 2024 for Edurant Ped. The Division of Antivirals (DAV) requested that we review the revised container label and carton labeling for Edurant Ped (Appendix A) to determine if they are acceptable from a medication error perspective. The revisions are in response to recommendations that we made during a previous label and labeling review.[a]

2 CONCLUSION

The revised container label and carton labeling is unacceptable from a medication error perspective. The "Disperse in water" statement on the container label remains not prominent enough, the carton labeling is missing information about how the tablets for oral suspension should not be crushed, and the "Tamper Area" of the carton may potentially cause obstruction of information.

[a] Bao, A. Label and Labeling Review for Edurant Ped (NDA 219016). Silver Spring (MD): FDA, CDER, OSE, DMEPA 1 (US); 2024 FEB 14. TTT ID No.: 2023-6394.

Reference ID: 5335016

3 RECOMMENDATIONS FOR JANSSEN PRODUCTS, LP

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

A. Container Label
    a. The “Disperse in water” statement does not stand out enough and may be overlooked. We recommend increasing the prominence of the “Disperse in water” statement on the container label (consider the use of boxing or a different font color/type, etc.).

B. Carton Labeling
    a. The warning statement is missing information about how the tablets for oral suspension should not be crushed. We recommend revising the statement “Do not chew, or swallow whole, see Instructions for Use” to “Do not crush, chew, or swallow whole, see Instructions for Use”
    b. We note that the “Tamper Area” on the back panel of the carton labeling may potentially obstruct information about the recommended dosage and storage information, please confirm that this information will not be obstructed upon final assembly of the carton.

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/s/

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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)

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Date of This Review:	February 14, 2024
Requesting Office or Division:	Division of Antivirals (DAV)
Application Type and Number:	NDA 219016
Product Name, Dosage Form, and Strength:	Edurant Ped (rilpivirine) tablets for oral suspension, 2.5mg
Product Type:	Single Ingredient Product
Rx or OTC:	Prescription (Rx)
Applicant/Sponsor Name:	Janssen Products, LP (Janssen)
FDA Received Date:	November 7, 2023, November 13, 2023, and January 5, 2024
TTT ID #:	2023-6394
DMEPA 1 Safety Evaluator:	Amy J. Bao, PharmD, MPH
DMEPA 1 Acting Team Leader:	Madhuri R. Patel, PharmD

Reference ID: 5328926

1 REASON FOR REVIEW

As part of the approval process for Edurant Ped (rilpivirine) tablets for oral suspension, the Division of Antivirals (DAV) requested that we review the proposed Edurant Ped prescribing information (PI), patient prescribing information (PPI), instructions for use (IFU), container labels, and carton labeling for areas of vulnerability that may lead to medication errors.

1.1 BACKGROUND

Edurant (rilpivirine) is currently marketed as a 25 mg tablet under NDA 202022. Janssen submitted a new dosage form, a 2.5 mg tablet for oral suspension, with a newly proposed proprietary name of Edurant Ped, under NDA 219016.

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	N/A
ISMP Newsletters*	N/A
FDA Adverse Event Reporting System (FAERS)*	N/A
Other	N/A
Labels and Labeling	B

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

Our evaluation of the proposed prescribing information (PI), patient prescribing information (PPI), and instructions for use (IFU) identified areas that may be improved to promote the safe use of this product from a medication error perspective. We collaborated with the review team to revise the PI, PPI, and IFU to ensure clarity in differentiation between the Edurant and Edurant Ped formulations and to ensure the dosing and administration instructions are not vulnerable to medication error.

Additionally, our evaluation of the proposed container label and carton labeling identified areas that 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

Reference ID: 5328926

our proposed recommendations to minimize the risk for medication error in Section 4 for Janssen Products, LP.

4 RECOMMENDATIONS FOR JANSSEN PRODUCTS, LP

Table 2. Identified Issues and Recommendations for Janssen Products, LP (entire table to be conveyed to Applicant)

	IDENTIFIED ISSUE	RATIONALE FOR CONCERN	RECOMMENDATION
Container Label			
1.	The location of the "Rx only" statement introduces visual clutter.	Visual clutter on small labels makes critical information more difficult to read.	We recommend moving the "Rx only" statement to the top right corner of each blister unit.
2.	The "(b) (4) statement is inaccurate as the (b) (4) medium that can initially be used is water, and also does not stand out enough.	Stating (b) (4) instead of "water" may cause patients to improperly attempt to initially disperse the tablets for oral suspension in (b) (4) (b) (4) Warning statements should appear prominently so users do not overlook them.	We recommend revising the (b) (4) statement to "disperse in water", and increasing its prominence (consider the use of different font size, type, color, statement location, boxing, etc.).
Carton Labeling			
1.	As currently presented, the carton labeling does not indicate that the proposed product is not substitutable with EDURANT tablets for oral use.	Inadvertent substitution can lead to medication errors such as, but not limited to, wrong drug errors leading to no treatment effect, overdose or underdose leading to adverse events or lack of efficacy.	We recommend adding the statement "Attention: EDURANT and EDURANT PED are NOT substitutable for one another" on the principal display panel (PDP). This recommendation also applies to the currently approved container label for Edurant (NDA 202022). Please submit an amendment to NDA 202022 S-020 with the revised container label for Edurant.
2.	The (b) (4) (b) (4) warning statement should be	Stating (b) (4) instead of "water" may cause patients to improperly attempt to	We recommend removing the statement "Read the Prescribing Information before

Table 2. Identified Issues and Recommendations for Janssen Products, LP (entire table to be conveyed to Applicant)			
	IDENTIFIED ISSUE	RATIONALE FOR CONCERN	RECOMMENDATION
	revised for accuracy and clarity. Additionally, "Read the Prescribing Information before use" is pointing users to the prescribing information, instead of the Instructions for Use.	initially disperse the tablets for oral suspension in (b) (4) (b) (4). The warning statement may not be interpreted as intended.	Use" and revising the warning statement text to: "DISPERSE IN WATER prior to administration Do not crush, chew, or swallow whole, see Instructions for Use" and adjusting the size/location of the warning statement box, as needed.
3.	The light blue font used for "PED" on the PDP is not prominent enough, (b) (4) font utilized inside the yellow boxed alert on the back panel is difficult to read and could be missed.	These instances of "PED" may be overlooked or not legible.	We recommend using a more prominent font color, font outlining, or some other method to increase the prominence of "PED" throughout the carton labeling. We recommend revising the (b) (4) font color to improve readability in the yellow boxed alert.

APPENDICES: METHODS & RESULTS FOR EACH MATERIAL REVIEWED

APPENDIX A. PRODUCT INFORMATION/PRESCRIBING INFORMATION

Table 3 presents relevant product information for Edurant Ped that Janssen Products, LP submitted on January 5, 2024, and the original dosage form approved on May 20, 2011.

Table 3. Relevant Product Information for Edurant and Edurant Ped		
Product Name	Edurant	Edurant Ped (proposed product)
Initial Approval Date	May 20, 2011	N/A
Active Ingredient	rilpivirine	
Indication	Treatment of HIV-1 infection in treatment-naïve patients (b) (4) (b) (4) Short-term treatment of HIV-1 infection in adults and adolescents ≥ 12 years weighing at least 35 kg who are virologically suppressed, in combination with cabotegravir.	Treatment of HIV-1 infection in treatment-naïve patients ≥2 to (b) (4) years weighing at least 10 kg and less than 25 kg. Treatment of HIV-1 infection in virologically suppressed pediatric patients ≥2 (b) (4) years and weighing at least (b) (4) kg and less than 25 kg.
Route of Administration	Oral	
Dosage Form	Tablets	Tablets for oral suspension
Strength	25 mg	2.5 mg
Dose and Frequency	One 25 mg tablet once daily with a meal For rifabutin coadministration: Two 25 mg tablets once daily with a meal for the duration of the rifabutin coadministration	For body weight ≥ 10 kg and < 20 kg: 12.5 mg (five 2.5 mg tablets) once daily with a meal For body weight ≥ 20 kg and < 25 kg: 15 mg (six 2.5 mg tablets) once daily with a meal
How Supplied	White to off-white, film-coated, round, biconvex, 6.4 mm tablets, debossed with "TMC" on one side and "25" on the other side.	White to almost white, round 6.5 mm, debossed with "TMC" on one side and "PED" on the other side
Storage	Store at 25°C (77°F); with excursions permitted to 15°-30°C (59°-86°F)	Store at 20°-25°C (68°-77°F); with excursions permitted to 15°-30°C (59°-86°F)

Table 3. Relevant Product Information for Edurant and Edurant Ped		
Product Name	Edurant	Edurant Ped (proposed product)
Container Closure	Bottle containing 30 tablets	Aluminum cold form film blister with integrated desiccant and an aluminum peelable lidding foil. Each blister contains 10 tablets with 9 blisters per carton

APPENDIX B. LABELS AND LABELING

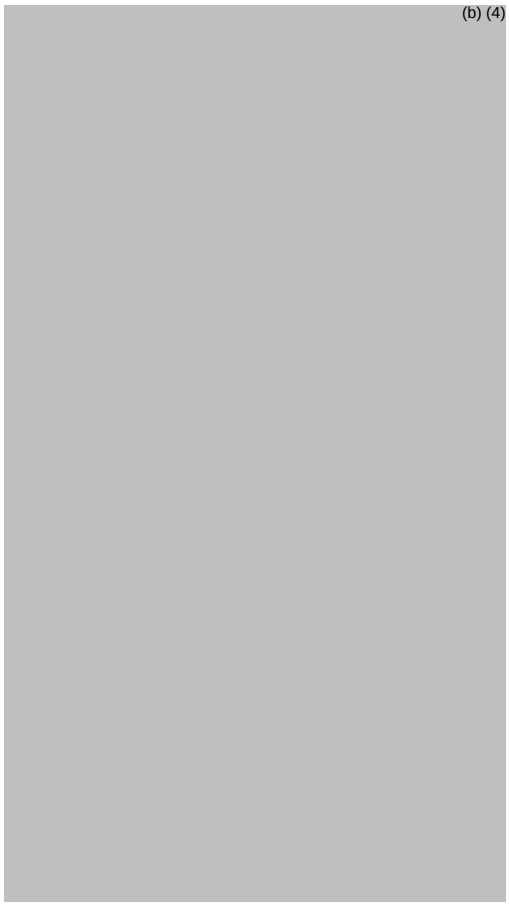
B.1 List of Labels and Labeling Reviewed

Using the principles of human factors and Failure Mode and Effects Analysis,[a] along with postmarket medication error experiences with similar products, we reviewed the following Edurant Ped labels and labeling submitted by Janssen Products, LP.

- Container label received on November 7, 2023
- Carton labeling received on January 5, 2024
- Prescribing Information and Patient Prescribing Information received on January 5, 2024, available from \\CDSESUB1\EVSPROD\nda219016\0016\m1\us\draft-annot-uspi-labeling-text.docx
- Instructions for Use received on November 13, 2023, available from \\CDSESUB1\EVSPROD\nda219016\0009\m1\us\draft-clean-ifu-labeling-text.docx

B.2 Label and Labeling Images

Container label



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

1 Page(s) of Draft Labeling has been Withheld in Full as b4 (CCI/TS) immediately following this page

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/s/

AMY J BAO
02/14/2024 02:17:01 PM

MADHURI R PATEL
02/14/2024 02:19:48 PM