

**CENTER FOR DRUG EVALUATION AND
RESEARCH**

APPLICATION NUMBER:

761530Orig1s000

PROPRIETARY NAME REVIEW(S)

SUFFIX REVIEW FOR NONPROPRIETARY NAME

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:	April 16, 2026
Responsible OND Division:	Division of Ophthalmology (DO)
Application Type and Number:	BLA 761530
Product Name and Strength:	Lumvoa (veligrotug-vvze) injection, 500 mg/10 mL (50 mg/mL)
Product Type:	Single Ingredient Product
Applicant/Sponsor Name:	Viridian Therapeutics, Inc. (Veridian)
FDA Received Date:	October 31, 2025
Nexus NPNS ID #:	2025-373
DMEPA 2 Biologics Suffix Specialist:	Carlos M Mena-Grillasca, BS Pharm
DMEPA 1 Associate Director for Nomenclature and Labeling:	Idalia Rychlik, PharmD

1 Purpose of Review

This review summarizes our evaluation of the four-letter suffixes proposed by Veridian for inclusion in the nonproprietary name and communicates our recommendation for the nonproprietary name for BLA 761530.

2 Assessment of the Nonproprietary Name

On October 31, 2025, Veridian submitted a list of 10 suffixes, in their order of preference, to be used in the nonproprietary name of their product.^a Veridian also provided findings from an external study conducted by (b) (4),^a evaluating the proposed four-letter suffixes in conjunction with the nonproprietary name, for our consideration. Table 1 presents the list of suffixes submitted by Veridian:

Table 1

Suffixes submitted by Veridian	
1.	(b) (4)
2.	
3.	vvze
4.	(b) (4)
5.	
6.	
7.	
8.	
9.	
10.	

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

(b) (4)

^a Biological Proper Name Suffix – Request for Nonproprietary Name Suffix BLA 761530. Waltham (MA): Viridian Therapeutics, Inc.; 2025 Oct 31. Available from: <\\CDSESUB1\EVSPROD\bla761530\0001\m1\us\118-proprietary-names\biol-proper-name-suffix.pdf>

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

2.3 **veligrotug–vvze**

Veridian's third proposed suffix, -vvze, is comprised of 3 distinct letters (v, z, e).

We determined that the proposed suffix -vvze, is not too similar to any other product's 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 1 Analysis**

These findings were shared with OPDP. On April 15, 2026, OPDP did not identify any promotional concerns that would render this proposed suffix unacceptable. DMEPA 1 also communicated our findings to the Division of Ophthalmology (DO) on April 16, 2026.

4 **Conclusion**

We find Veridian's proposed suffix –vvze acceptable. DMEPA 1 will communicate our findings to the Applicant via letter.

4.1 **Recommendations for Viridian Therapeutics, Inc.**

We find the nonproprietary name, veligrotug-vvze, conditionally acceptable for your proposed product. Should your 351(a) BLA be approved during this review cycle, veligrotug-vvze 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 suffix will be re-evaluated. If we find your suffix unacceptable upon our re-evaluation, we will inform you of our findings.

We also note that following proposed suffixes are unacceptable for the following reason(s):

(b) (4)

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
04/16/2026 02:38:34 PM

IDALIA E RYCHLIK
04/16/2026 03:45:01 PM

PROPRIETARY NAME REVIEW

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

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Date of This Review:	November 10, 2025
Application Type and Number:	IND 155731 and BLA 761530
Product Name, Dosage Form, and Strength:	Lumvoa (veligrotug) Injection, 500 mg/10 mL (50 mg/mL)
Product Type:	Single Ingredient Product
Rx or OTC:	Prescription (Rx)
Applicant/Sponsor Name:	Viridian Therapeutics, Inc. (Viridian)
PNR ID #:	2025-1044726610 and 2025-1044726819
DMEPA 1 Safety Evaluator:	Deborah Myers, RPh, MBA
DMEPA 1 Team Leader:	Valerie S. Vaughan, PharmD
DMEPA 1 Associate Director for Nomenclature and Labeling:	Idalia Rychlik, PharmD

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1 INTRODUCTION

This review evaluates the proposed proprietary name, Lumvoa, 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. Viridian submitted the same external name study, conducted by (b) (4),^a for this proposed proprietary name under both IND 155731 and BLA 761530.

1.1 REGULATORY HISTORY

Viridian previously submitted the proposed proprietary name, (b) (4) *** under IND 155731 on March 25, 2025. However, on June 9, 2025, we found the name, (b) (4) *** unacceptable due to spelling and pronunciation similarities with the proposed proprietary name, (b) (4) ***.^b

Thus, Viridian submitted the alternative proposed proprietary name, Lumvoa, for review on July 18, 2025 under IND 155731.

Subsequently, on October 31, 2025, Viridian submitted their Original Biologics License Application (BLA) which included their request for review of the proposed proprietary name, Lumvoa, under BLA 761530. Additionally, we note that the cover letter, included in this submission, states that “*The proprietary name report being submitted with this BLA is identical to the report previously submitted to the Agency under IND 155731 (SN 0122) on 18 July 2025, which is currently under review with a PDUFA goal date of 14 January 2026.*”^c

This review evaluates the proposed proprietary name, Lumvoa, under both IND 155731 and BLA 761530.

^a Request for Proprietary Name Review for veligrotug: Lumvoa. (b) (4); 2025 JUL. Available from: <\\CDSESUB1\EVSPROD\ind155731\0122\m1\us\request-for-proprietary-name-review---viridian-therapeut.pdf>.

^b Myers, D. Proprietary Name Review for (b) (4) *** (IND 155731). Silver Spring (MD): FDA, CDER, OSE, DMEPA 1 (US); 2025 JUN 09. PNR ID No. 2025-1044726354.

^c Cover Letter: Original Biologics License Application (BLA) Submission for Veligrotug injection (BLA 761530). Waltham (MA): Viridian Therapeutics, Inc.; 2025 OCT 31. Available from: <\\CDSESUB1\EVSPROD\bla761530\0001\m1\us\12-cover-letters\cover.pdf>.

1.2 PRODUCT INFORMATION

The following product information is provided in the proprietary name submission received on July 18, 2025, under IND 155731^d, and the prescribing information received on October 31, 2025, under BLA 761530.^e

Table 1. Relevant Product Information for Lumvoa	
Intended pronunciation:	Loom-VOH-uh
Active ingredient:	veligrotug
Indication:	For the treatment of Thyroid Eye Disease regardless of Thyroid Eye Disease activity or duration.
Dosage Form:	Injection
Strength:	500 mg/10 mL (50 mg/mL)
Route of administration:	Intravenous infusion
Dose and frequency:	10 mg/kg every 3 weeks for 5 infusions.
How Supplied:	Carton containing one 500 mg/10 mL single-dose vial.
Storage:	Refrigerate at 2°C to 8°C (36°F to 46°F) in original carton (b) (4) to protect from light. Do not freeze. Do not shake.

2 DISCUSSION

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

2.1 MISBRANDING ASSESSMENT

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

2.2 SAFETY ASSESSMENT

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

^d Cover Letter: Request for Proprietary Name Review for veligrotug (VRDN-001) IND 155731. Waltham (MA): Viridian Therapeutics, Inc.; 2025 JUL 18. Available from: <\\CDSESUB1\EVSPROD\ind155731\0122\m1\us\cover-letter ind-155731 sn-0122 proprietary-name-review.pdf>.

^e Proposed prescribing information for Veligrotug injection (BLA 761530). Waltham (MA): Viridian Therapeutics, Inc.; 2025 OCT 31. Available from: <\\CDSESUB1\EVSPROD\bla761530\0001\m1\us\114-labeling\draft\labeling\draft-labeling-pdf.pdf>.

2.2.1 UNITED STATES ADOPTED NAMES (USAN) SEARCH

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

2.2.2 COMPONENTS OF THE PROPOSED PROPRIETARY NAME

Viridian did not provide a derivation or intended meaning for the proposed proprietary name, Lumvoa, in their submission.

This proprietary name is comprised of a single word that contains the letter string “-vo-”, which is a medical abbreviation for “verbal order.” In some circumstances, the incorporation of medical abbreviations in proprietary names can inadvertently be a source of error. For more information see draft guidance, *Best Practices in Developing Proprietary Names for Human Prescription Drug Products*.^g Although we typically discourage the inclusion of medical abbreviations in proprietary names, we determined that the location of the abbreviation “vo” in the middle of the proposed proprietary name, Lumvoa, makes it unlikely for the “vo” letter string to be separated from the surrounding letters in a manner that could lead to confusion. Thus, we do not object to the inclusion of the “vo” letter string in this case.

Beyond the noted abbreviation, we note that PPN does not contain any additional components (i.e., a modifier, dosage form, etc.) that are misleading or can contribute to medication error.

2.2.3 COMMENTS FROM OTHER REVIEW DISCIPLINES AT INITIAL REVIEW

The Division of Ophthalmology (DO) did not forward any comments or concerns relating to Lumvoa at the initial phase of the review.

2.2.4 FDA PRESCRIPTION SIMULATION STUDIES

Eighty-three (83) practitioners participated in FDA’s prescription simulation studies for Lumvoa. The responses did not overlap with any currently marketed products nor did the responses sound or look similar to any currently marketed products or any products in the pipeline. Appendix B contains the results from the prescription simulation studies.

2.2.5 PHONETIC AND ORTHOGRAPHIC COMPUTER ANALYSIS (POCA) SEARCH RESULTS

Our POCA search^h identified thirty-two (32) 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.

^f USAN stem search conducted on July 22, 2025.

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

^h POCA search conducted on July 22, 2025 in version 5.13.7.

2.2.6 NAMES RETRIEVED FOR REVIEW ORGANIZED BY NAME PAIR SIMILARITY

Table 2 provides the number of names retrieved from our POCA search 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 $\geq 70\%$	2
Moderately similar name pair: combined match percentage score $\geq 55\%$ to $\leq 69\%$	28
Low similarity name pair: combined match percentage score $\leq 54\%$	7

2.2.7 SAFETY ANALYSIS OF NAMES IDENTIFIED

Our analysis of the thirty-eight (37) names contained in Table 2 determined none of the names will pose a risk for confusion with Lumvoa as described in Appendices C through H.

2.2.8 COMMUNICATION OF DMEPA'S DETERMINATION

On November 10, 2025, DMEPA 1 communicated our determination to the Division of Ophthalmology (DO).

3 CONCLUSION

The proposed proprietary name, Lumvoa, is conditionally acceptable.

3.1 COMMENTS TO VIRIDIAN THERAPEUTICS, INC.

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

If any of the proposed product characteristics as stated in your submissions, received on July 18, 2025 and October 31, 2025, 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.ⁱ

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.

ⁱ 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 (Tables 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 that 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^j. 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 and 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-

^j 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

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 as 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 as 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 $\leq 69\%$).

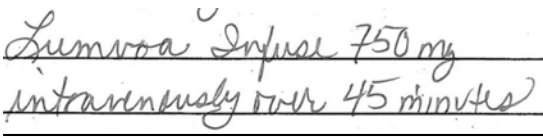
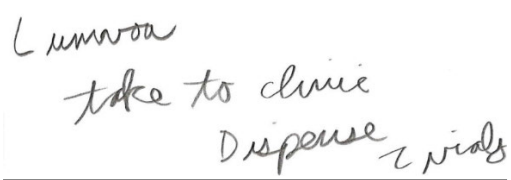
	placement of upstroke/downstroke letters present in the names? • Is there different number or placement of cross-stroke or dotted letters present in the names? • Do the infixes of the names appear dissimilar when scripted? • Do the suffixes of the names appear dissimilar when scripted?	
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Table 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. Lumvoa Study (Conducted on 7/29/2025)

Handwritten Medication Order Prescription	Verbal Prescription
<u>Medication Order:</u> 	Lumvoa Take to clinic. Dispense 2 vials
<u>Outpatient Prescription:</u> 	
CPOE Study Sample (displayed as sans-serif, 12-point, bold font) Lumvoa	

FDA Prescription Simulation Responses (Aggregate Report)					
Study Name: Lumvoa					
People Received Study: 161					
People Responded: 83					
Total	21	21	20	21	83
INTERPRETATION	INPATIENT	OUTPATIENT	VOICE	CPOE	TOTAL
BLUMVOA	0	0	1	0	1
FLUMVOA	0	0	1	0	1
LIMVO	0	0	1	0	1
LOUMVOAH	0	0	1	0	1
LUMAVOA	0	2	0	0	2
LUMOVOA	0	1	0	0	1
LUMROA	0	1	0	0	1
LUMUOA	0	1	0	0	1
LUMVOA	20	16	10	21	67
LUMVOA INFUSION	1	0	0	0	1
LUMVOVA	0	0	1	0	1
LUMVOWA	0	0	2	0	2
LUMZOA	0	0	1	0	1
LUVOA	0	0	2	0	2

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

No.	Proposed name: Lumvoa Pronunciation: Loom-VOH-uh Established name: veligrotug Dosage form: Injection Strength: 500 mg/10 mL (50 mg/mL) Dosage: 10 mg/kg every 3 weeks for 5 doses	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.	Lumvoa	100	This name is the subject of this review.
2.	(b) (4) ***	72	Proposed proprietary name for IND (b) (4) found to be unacceptable by DMEPA (PNR ID (b) (4)). Subsequently, the proposed proprietary name, (b) (4) ***, was found conditionally acceptable for IND (b) (4) (PNR ID (b) (4)) and was subsequently submitted for review under BLA (b) (4) and found conditionally acceptable for BLA (b) (4) (PNR ID # (b) (4)). BLA (b) (4) is currently pending. Of note, the initial pending proprietary name of conflict occurred with the proposed proprietary name, Imaavy (IND 138975/BLA 761430); BLA 761430 was subsequently approved under the name, Imaavy, on April 29, 2025.

APPENDIX D. MODERATELY SIMILAR NAMES (e.g., combined POCA score is $\geq 55\%$ to $\leq 69\%$) with no overlap or numerical similarity in Strength and/or Dose

No.	Name	POCA Score (%)
1.	Aluvea	64

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

No.	Proposed name: Lumvoa Pronunciation: Loom-VOH-uh Established name: veligrotug Dosage form: Injection Strength: 500 mg/10 mL (50 mg/mL) Dosage: 10 mg/kg every 3 weeks for 5 doses	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.	(b) (4) ***	68	This name pair has sufficient orthographic and phonetic differences.
2.	Columvi	62	This name pair has sufficient orthographic and phonetic differences.
3.	Levora Levora 0.15/30-28	61	Orthographically, the second and third letters ('u' and 'm' <i>versus</i> 'e' and 'v') and fifth letters ('o' <i>versus</i> 'r') provide some orthographic differences. Phonetically, the ending sound of the first syllables (loom <i>versus</i> le) sound different and provide some phonetic difference. Furthermore, the product characteristics are different. Levora 0.15/30-28, does not overlap in dose (10 mg/kg <i>versus</i> one tablet) or frequency (every 3 weeks for 5 doses <i>versus</i> once daily). Moreover, there is no overlap in route of administration (intravenous infusion <i>versus</i> oral) or dosage form (injection <i>versus</i> tablet), if included on the prescription order. When all the aforementioned mitigations are considered in totality, we find the risk of name confusion is adequately minimized in this case.
4.	Lumjev	61	This name pair has sufficient orthographic and phonetic differences.
5.	Lovaza	60	This name pair has sufficient orthographic and phonetic differences.
6.	Lumason	60	Orthographically, the fourth and fifth letters ('v' and 'o' <i>versus</i> 'a' and 's') of the

No.	Proposed name: Lumvoa Pronunciation: Loom-VOH-uh Established name: veligrotug Dosage form: Injection Strength: 500 mg/10 mL (50 mg/mL) Dosage: 10 mg/kg every 3 weeks for 5 doses	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
			proposed proprietary name, Lumvoa <i>versus</i> Lumason, and the additional seventh letter ('n') in Lumason, provide some orthographic differences. Phonetically, the second syllables (voh <i>versus</i> uh) and third syllables (uh <i>versus</i> son) in the name pair sound different when spoken. There is no direct overlap in dose (10 mg/kg <i>versus</i> 1 mL, 2 mL, 2.4 mL, or 0.03 mL/kg (do not exceed 2.4 mL per injection)) or frequency of administration (every 3 weeks for 5 doses <i>versus</i> once during examination <i>or</i> may repeat one time during a single examination), which may provide additional differentiation if included on the prescription/medication order. When the aforementioned mitigations are considered in totality, we find the risk for confusion is adequately minimized in this case.
7.	Ilumya	59	This name pair has sufficient orthographic and phonetic differences.
8.	Lumify	59	This name pair has sufficient orthographic and phonetic differences.
9.	Jylamvo	58	This name pair has sufficient orthographic and phonetic differences.
10.	Lenvima	58	This name pair has sufficient orthographic and phonetic differences.
11.	Lynavoy***	58	This name pair has sufficient orthographic and phonetic differences.

No.	Proposed name: Lumvoa Pronunciation: Loom-VOH-uh Established name: veligrotug Dosage form: Injection Strength: 500 mg/10 mL (50 mg/mL) Dosage: 10 mg/kg every 3 weeks for 5 doses	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
12.	Almora	56	This name pair has sufficient orthographic and phonetic differences.
13.	Alsuma	56	This name pair has sufficient orthographic and phonetic differences.
14.	(b) (4) ***	56	This name pair has sufficient orthographic and phonetic differences.
15.	Luminal	56	This name pair has sufficient orthographic and phonetic differences.
16.	Lunsumio	56	This name pair has sufficient orthographic and phonetic differences.
17.	Luvox	56	This name pair has sufficient orthographic and phonetic differences.
18.	(b) (4) ***	56	This name pair has sufficient orthographic and phonetic differences.

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

No.	Name	POCA Score (%)
1.	Lumigan	54
2.	Lumryz	54
3.	Valu-Foam	54
4.	Lunesta	50
5.	Oxlumo	50
6.	Linzess	44
7.	Renvela	44

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.	Levora 0.15/30-21	61	Name identified in Drugs@FDA database. Product is deactivated and no generic equivalents are available.
2.	(b) (4) ***	60	Proposed proprietary name for IND 126779 found to be unacceptable due to a conflict with a marketed products (OSE RCM # 2016-8970859 dated 12/20/2016). NDA 209355 approved under the proprietary name, Bryhali.
3.	(b) (4) ***	58	Proposed proprietary name for IND 113556 found unacceptable by DMEPA based on OPDP's objection (OSE RCM # 2017-19173699 dated 04/03/2018). BLA 761126 approved under the proprietary name, Nypozi.
4.	(b) (4) ***	58	Proposed proprietary name for IND (b) (4) found to be conditionally acceptable (PNR ID # (b) (4) (b) (4)); however, the entire application was inactivated by the Sponsor (b) (4).
5.	(b) (4) ***	56	Proposed proprietary name for NDA 213586 found unacceptable by DMEPA (PNR ID # 2021-1044724048 dated 09/24/2021). NDA 213586 approved under the proprietary name, Uzedy.
6.	(b) (4) ***	56	Proposed proprietary name for IND 120109 found to be unacceptable by DMEPA (PNR ID # 2023-1044725277 dated 12/4/2023). BLA 761384 approved under the proprietary name, Emrelis.

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

No.	Name	POCA Score (%)
1.	Vimovo	56
2.	Zunovo	56

^k 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

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/s/

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