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Division of Dockets Management (HFA-305)
Food and Drug Administration
Department of Health and Human Services
5630 Fishers Lane, Room 1061
Rockville, MD 20852

CITIZEN PETITION

Dear Sir or Madam:

This petition is submitted in quadruplicate under Section 505(j)(2)(C) of the Federal Food, Drug and Cosmetic Act, 21 U.S.C. §355(j)(2)(C) and 21 CFR 910.20 and §10.30, and 21 CFR §314.93, to request the Commissioner of Food and Drug Administration to make a determination that an abbreviated new drug application (ANDA) may be submitted for Warfarin Sodium Solution.

A. Action Requested

Morton Grove Pharmaceuticals, Inc. (MGP) requests that the Commissioner of Food and Drug Administration declare that Warfarin Sodium Solution for oral administration is suitable for submission as an ANDA. The reference listed drug product upon which this petition is based is Warfarin sodium oral tablets, available in tablet strengths of 1mg, 2mg, 2.5mg, 3mg, 4mg, 5mg, 6mg, 7mg, 7.5mg and 10mg. The brand name of the product is *Coumadin* manufactured by *Bristol Myers Squibb*. Since Coumadin, with strength 10mg is the designated RLD upon which this petition is based upon, the petition requests a change in dosage form from tablets to oral solution from that of the listed drug.

B. Statement of Grounds

Section 505(j)(2)(C) of the Federal Food, Drug and Cosmetic Act provides for submission of an ANDA for a new drug that differs in dosage form from a listed drug, provided that the FDA has approved a petition seeking permission to file such an application, pursuant to 21 CFR 314.93. In accordance with 21 CFR 314.93(b), this petition seeks a change in dosage form from that of the reference listed drug product from a tablet to an oral solution. The need for an oral solution dosage form is that it serves as a viable alternative for patients—particularly the elderly—who have problems swallowing the tablet dosage form.

The proposed drug product will differ only in dosage form. The indications, dosage recommendations, strengths and route of administration, are the same as those included in approved labeling of the listed drug. See labeling for RLD Coumadin®, Attachment 1; proposed labeling for Morton Grove's Warfarin Sodium Solution, attachment 2.

The dosage strengths of the two products for dosage administration are the same. Coumadin® is supplied in tablets containing 1 mg., 2 mg., 2-1/2 mg., 3 mg., 4 mg., 5 mg., 6 mg., 7-1/2 mg., 10 mg. of warfarin sodium. The Warfarin Sodium Solution is provided in solution which contains 1 mg/mL of warfarin sodium. The Warfarin Sodium Solution is dispensed in a package containing a vial of solution and a syringe for oral administration which is marked in one-half mL increments up to 10 mL. Thus, the product would administer the exact same dosage amounts of warfarin as the RLD. Two package sizes of Warfarin Sodium Solution are available, containing 60 mL and 180 mL.

Accordingly, the proposed change in dosage form from warfarin tablets to warfarin oral solution raises no questions regarding the safety and efficacy of the proposed products. The indication remains unchanged and the proposed labeling will be the same as that of the approved labeling of the listed drug except for the Description (inactive ingredients), How Supplied (dosage form and amounts), and Product Distributor. See

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Attachment 2. Thus, the Agency should conclude that clinical investigations are not necessary to demonstrate the proposed product's safety or effectiveness.

The approved labeling for the listed drug is provided in Attachment 1. The proposed package insert for Warfarin Sodium Solution is provided in Attachment 2. A copy of the appropriate page from the electronic Approved Drug Products with Therapeutic Equivalence Evaluations 24th Edition (commonly referred to as the Electronic Orange Book) showing the listing of the reference-listed drug product upon which this petition is based is included in Attachment 3.

C. Pediatric Waiver Request

In December of 2003, Congress passed the Pediatric Research Equity Act of 2003 that amended the Federal Food, Drug and Cosmetic Act to provide the Agency authority to require drug firms to study certain drugs in pediatric patients, if the Agency felt that such study would provide beneficial health data for that patient population.

In the Pediatric Rule, issued by the FDA in the Federal Register on December 2, 1998, 63 FR 66632 and codified in FDA's regulations at 21 CFR 314.55(c)(2)(i), (ii), and (iii), a waiver of pediatric studies may be granted upon a showing of any of the following:

the drug

1. does not represent a meaningful therapeutic benefit over existing therapies for pediatric patients;
2. is not likely to be used in a substantial number of pediatric patients;
3. evidence strongly suggests that the drug product would be ineffective or unsafe in all pediatric age groups.

See 21 CFR 314.55(c)(2)(i), (ii), and (iii).

The petitioner hereby requests that a waiver from the conduct of pediatric studies be granted for the approval of this petition to permit subsequent ANDA filing. The reference-listed drug product is currently available in a conventional immediate-release tablet and is not, according to the approved labeling, recommended for use in pediatric patients. For this reason, the change in dosage form to an oral solution from an immediate-release tablet would not likely result in use in the pediatric population. In addition, Warfarin Sodium does not appear on the historical listing of drug products for which studies may provide health benefits to the pediatric population. The proposed product, designed to provide a more convenient dosage form for adult patients that cannot swallow tablets would, therefore, not represent a meaningful benefit over existing therapies for the pediatric patient. In addition, based on the labeling of the proposed product, it is not likely to be used in a substantial number of pediatric patients. See, Monagle P, Chan A, Chalmers E, Michelson AD et al. Antithrombotic Therapy in Children. The 7th ACCP Conference on Antithrombotic and Thrombolytic Therapy. Chest 2004; 126 (suppl 3): 645s- 687s (Noting "Recommendations for antithrombotic therapy in pediatric patients have been extrapolated from recommendations from adults, because thromboembolic events in pediatric patients were rare enough to hinder testing of specific therapeutic modalities...."; "Since the first publication of this article in the 1995 Chest antithrombotic supplement, <10 multinational randomized controlled interventional trials assessing specific aspects of anticoagulant therapy in children have been initiated, and most of these have failed to enroll an adequate number of patients to answer the primary study question."). See also, e.g., M.L. Buck, "Anticoagulation with Warfarin in Infants and Children," The Annals of Pharmacotherapy, Vol. 30 No. 11, pp. 1316-1322 (1966) (Noting "infrequent use" of warfarin in children); Streiff et. al, "Analysis of Warfarin Therapy in Pediatric Patients: A Prospective Cohort Study of 319 Patients" Blood, Vol. 94 No. 9, (Nov. 1, 1999), pp. 3007-14 (noting "there is relatively little information on warfarin use in children").

In addition, warfarin is a narrow therapeutic index drug and therefore its use presents a significant risk to children which would contraindicate its widespread use in this population. As noted in Streiff, above, the use of warfarin in children shows a "profound effect of age and relative complexity of clinical management of warfarin therapy." As shown in the prescribing information, the product poses serious risks to patients, including hemorrhage and other serious adverse events. In addition, as noted in the prescribing



information, the effectiveness and concentration of the drug is mediated, often severely, by an extensive list of factors, including travel, change in diet, environment, physical state and medications. These factors, which render the drug difficult to manage in adults, would a fortiori contraindicate any kind of widespread use in children, as is the case.

As a result, the use of warfarin in children is potentially very hazardous, and therefore its use in this population is uncommon and accordingly would not represent a therapeutic benefit for pediatric patients.

D. Environmental Impact

The petitioner claims a categorical exclusion under 21 CFR 525.31.

E. Economic Impact

According to 21 CFR §10.30(b), the petitioner will, upon request by the Commissioner, submit economic impact information.

F. Certification

The undersigned certifies that to the best of its knowledge, this petition includes all information and views on which the petition relies, and that it includes representative data and information known to the petitioner (MGP), which is unfavorable to the petition.

Sincerely,



Chang Lee, MD, MSHA, DrPH
Vice President, Regulatory Affairs
Morton Grove Pharmaceuticals, Inc.
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Attachments:

- 1. Labeling for the Innovator (Coumadin Tablets)*
- 2. Labeling for the Generic product (Warfarin Sodium Solution)*
- 3. Approved Drug Products with Therapeutic Equivalence Evaluations 24th Edition (electronic)*

cc: Emily Thakur (Office of Generic Drugs)



ATTACHMENT-1
Labeling for the Innovator product (Coumadin® Tablets)

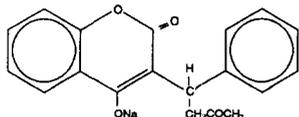
Anticoagulant

COUMADIN® TABLETS
(Warfarin Sodium Tablets, USP) Crystalline

COUMADIN® FOR INJECTION
(Warfarin Sodium for Injection, USP)

DESCRIPTION

COUMADIN (crystalline warfarin sodium) is an anticoagulant which acts by inhibiting vitamin K-dependent coagulation factors. Chemically, it is 3-(α -acetylbiphenyl)-4-hydroxycoumarin and is a racemic mixture of the R- and S-enantiomers. Crystalline warfarin sodium is an isopropanol dihydrate. The crystallization of warfarin sodium virtually eliminates trace impurities present in amorphous warfarin. Its empirical formula is $C_{19}H_{15}NaO_4$, and its structural formula may be represented by the following:



Crystalline warfarin sodium occurs as a white, odorless, crystalline powder, is discolored by light and is very soluble in water; freely soluble in alcohol; very slightly soluble in chloroform and in ether.

COUMADIN Tablets for oral use also contain:

All strengths:	Lactose, starch and magnesium stearate
1 mg:	D&C Red No. 6 Barium Lake
2 mg:	FD&C Blue No. 2 Aluminum Lake and FD&C Red No. 40 Aluminum Lake
2-1/2 mg:	D&C Yellow No. 10 Aluminum Lake and FD&C Blue No. 1 Aluminum Lake
3 mg:	FD&C Yellow No. 6 Aluminum Lake, FD&C Blue No. 2 Aluminum Lake and FD&C Red No. 40 Aluminum Lake
4 mg:	FD&C Blue No. 1 Aluminum Lake
5 mg:	FD&C Yellow No. 6 Aluminum Lake
6 mg:	FD&C Yellow No. 6 Aluminum Lake and FD&C Blue No. 1 Aluminum Lake
7-1/2 mg:	D&C Yellow No. 10 Aluminum Lake and FD&C Yellow No. 6 Aluminum Lake
10 mg:	Dye Free

COUMADIN for Injection is supplied as a sterile, lyophilized powder, which, after reconstitution with 2.7 mL sterile Water for Injection, contains:

Warfarin Sodium	2 mg/mL
Sodium Phosphate, Dibasic, Heptahydrate	4.98 mg/mL
Sodium Phosphate, Monobasic, Monohydrate	0.194 mg/mL
Sodium Chloride	0.1 mg/mL
Mannitol	38.0 mg/mL
Sodium Hydroxide, as needed for pH adjustment to	8.1 to 8.3

CLINICAL PHARMACOLOGY

COUMADIN and other coumarin anticoagulants act by inhibiting the synthesis of vitamin K dependent clotting factors, which include Factors II, VII, IX and X, and the anticoagulant proteins C and S. Half-lives of these clotting factors are as follows: Factor II - 60 hours, VII - 4-6 hours, IX - 24 hours, and X - 48-72 hours. The half-lives of proteins C and S are approximately 8 hours and 30 hours, respectively. The resultant *in vivo* effect is a sequential depression of Factors VII, IX, X and II activities. Vitamin K is an essential cofactor for the post ribosomal synthesis of the vitamin K dependent clotting factors. The vitamin promotes the biosynthesis of γ -carboxyglutamic acid residues in the proteins which are essential for biological activity. Warfarin is thought to interfere with clotting factor synthesis by inhibition of the regeneration of vitamin K₁ epoxide. The degree of depression is dependent upon the dosage administered. Therapeutic doses of warfarin decrease the total amount of the active form of each vitamin K dependent clotting factor made by the liver by approximately 30% to 50%.

An anticoagulation effect generally occurs within 24 hours after drug administration. However, peak anticoagulant effect may be delayed 72 to 96 hours. The duration of action of a single dose of racemic warfarin is 2 to 5 days. The effects of COUMADIN may become more pronounced as effects of daily maintenance doses overlap. Anticoagulants have no direct effect on an established thrombus, nor do they reverse ischemic tissue damage. However, once a thrombus has occurred, the goal of anticoagulant treatment is to prevent further extension of the formed clot and prevent secondary thromboembolic complications which may result in serious and possibly fatal sequelae.

Pharmacokinetics: COUMADIN is a racemic mixture of the R- and S-enantiomers. The S-enantiomer exhibits 2-5 times more anticoagulant activity than the R-enantiomer in humans, but generally has a more rapid clearance.

Absorption: COUMADIN is essentially completely absorbed after oral administration with peak concentration generally attained within the first 4 hours.

Distribution: There are no differences in the apparent volumes of distribution after intravenous and oral administration of single doses of warfarin solution. Warfarin distributes into a relatively small apparent volume of distribution of about 0.14 liter/kg. A distribution phase lasting 6 to 12 hours is distinguishable after rapid intravenous or oral administration of an aqueous solution. Using a one compartment model, and assuming complete bioavailability, estimates of the volumes of distribution of R- and S-warfarin are similar to each other and to that of the racemate. Concentrations in fetal plasma approach the maternal values, but warfarin has not been found in human milk (see WARNINGS: Lactation). Approximately 99% of the drug is bound to plasma proteins.

Metabolism: The elimination of warfarin is almost entirely by metabolism. COUMADIN is stereoselectively metabolized by hepatic microsomal enzymes (cytochrome P-450) to inactive hydroxylated metabolites (predominant route) and by reductases to reduced metabolites (warfarin alcohols). The warfarin alcohols have minimal anticoagulant activity. The metabolites are principally excreted into the urine; and to a lesser extent into the bile. The metabolites of warfarin that have been identified include dehydrowarfarin, two diastereoisomer alcohols, 4', 6-, 7-, 8- and 10-hydroxywarfarin. The cytochrome P-450 isozymes involved in the metabolism of warfarin include 2C9, 2C19, 2C8, 2C18, 1A2, and 3A4. 2C9 is likely to be the principal form of human liver P-450 which modulates the *in vivo* anticoagulant activity of warfarin.

Excretion: The terminal half-life of warfarin after a single dose is approximately one week; however, the effective half-life ranges from 20 to 60 hours, with a mean of about 40 hours. The clearance of R-warfarin is generally half that of S-warfarin, thus as the volumes of distribution are similar, the half-life of R-warfarin is longer than that of S-warfarin. The half-life of R-warfarin ranges from 37 to 89 hours, while that of S-warfarin ranges from 21 to 43 hours. Studies with radiolabeled drug have demonstrated that up to 92% of the orally administered dose is recovered in urine. Very little warfarin is excreted unchanged in urine. Urinary excretion is in the form of metabolites.

Elderly: Patients 60 years or older appear to exhibit greater than expected prothrombin time (PT)/International Normalized Ratio (INR) response to the anticoagulant effects of warfarin. The cause of the increased sensitivity to the anticoagulant effects of warfarin in this age group is unknown. This increased anticoagulant effect from warfarin may be due to a combination of pharmacokinetic and pharmacodynamic factors. Racemic warfarin clearance may be unchanged or reduced with increasing age. Limited information suggests there is no difference in the clearance of S-warfarin in the elderly versus young subjects. However, there may be a slight decrease in the clearance of R-warfarin in the elderly as compared to the young. Therefore, as patient age increases, a lower dose of warfarin is usually required to produce a therapeutic level of anticoagulation.

Asians: Asian patients may require lower initiation and maintenance doses of warfarin. One non-controlled study conducted in 151 Chinese outpatients reported a mean daily warfarin requirement of 3.3 ± 1.4 mg to achieve an INR of 2 to 2.5. These patients were stabilized on warfarin for various indications. Patient age was the most important determinant of warfarin requirement in Chinese patients with a progressively lower warfarin requirement with increasing age.

Rx only

Renal Dysfunction: Renal clearance is considered to be a minor determinant of anticoagulant response to warfarin. No dosage adjustment is necessary for patients with renal failure.

Hepatic Dysfunction: Hepatic dysfunction can potentiate the response to warfarin through impaired synthesis of clotting factors and decreased metabolism of warfarin.

The administration of COUMADIN (Warfarin Sodium) via the intravenous (IV) route should provide the patient with the same concentration of an equal oral dose, but maximum plasma concentration will be reached earlier. However, the full anticoagulant effect of a dose of warfarin may not be achieved until 72-96 hours after dosing, indicating that the administration of IV COUMADIN should not provide any increased biological effect or earlier onset of action.

Clinical Trials

Atrial Fibrillation (AF): In five prospective randomized controlled clinical trials involving 3711 patients with non-rheumatic AF, warfarin significantly reduced the risk of systemic thromboembolism including stroke (See Table 1). The risk reduction ranged from 60% to 86% in all except one trial (CAFA: 45%) which stopped early due to published positive results from two of these trials. The incidence of major bleeding in these trials ranged from 0.6 to 2.7% (See Table 1). Meta-analysis findings of these studies revealed that the effects of warfarin in reducing thromboembolic events including stroke were similar at either moderately high INR (2.0-4.5) or low INR (1.4-3.0). There was a significant reduction in minor bleeds at the low INR. Similar data from clinical studies in valvular atrial fibrillation patients are not available.

TABLE 1: Clinical Studies of Warfarin in Non-Rheumatic AF Patients*

Study	N		Thromboembolism			% Major Bleeding		
	Warfarin-Treated Patients	Control Patients	PT Ratio	INR	% Risk Reduction	p-value	Warfarin-Treated Patients	Control Patients
AFASAK	335	336	1.5-2.0	2.8-4.2	60	0.027	0.6	0.0
SPAF	210	211	1.3-1.8	2.0-4.5	67	0.01	1.9	1.9
BAATAF	212	208	1.2-1.5	1.5-2.7	86	<0.05	0.9	0.5
CAFA	187	191	1.3-1.6	2.0-3.0	45	0.25	2.7	0.5
SPINAF	260	265	1.2-1.5	1.4-2.8	79	0.001	2.3	1.5

*All study results of warfarin vs. control are based on intention-to-treat analysis and include ischemic stroke and systemic thromboembolism, excluding hemorrhage and transient ischemic attacks.

Myocardial Infarction: WARIS (The Warfarin Re-infarction Study) was a double-blind, randomized study of 1214 patients 2 to 4 weeks post-infarction treated with warfarin to a target INR of 2.8 to 4.8. [But note that a lower INR was achieved and increased bleeding was associated with INR's above 4.0; (see DOSAGE AND ADMINISTRATION)]. The primary endpoint was a combination of total mortality and recurrent infarction. A secondary endpoint of cerebrovascular events was assessed. Mean follow-up of the patients was 37 months. The results for each endpoint separately, including an analysis of vascular death, are provided in the following table:

TABLE 2

Event	Warfarin (N=607)	Placebo (N=607)	RR (95% CI)	% Risk Reduction (p-value)
Total Patient Years of Follow-up	2018	1944		
Total Mortality	94 (4.7/100 py)	123 (6.3/100 py)	0.76 (0.60, 0.97)	24 (p=0.030)
Vascular Death	82 (4.1/100 py)	105 (5.4/100 py)	0.78 (0.60, 1.02)	22 (p=0.068)
Recurrent MI	82 (4.1/100 py)	124 (6.4/100 py)	0.66 (0.51, 0.85)	34 (p=0.001)
Cerebrovascular Event	20 (1.0/100 py)	44 (2.3/100 py)	0.46 (0.28, 0.75)	54 (p=0.002)

RR=Relative risk; Risk reduction=(1 - RR); CI=Confidence interval; MI=Myocardial infarction; py=patient years

Mechanical and Bioprosthetic Heart Valves: In a prospective, randomized, open label, positive-controlled study (Mok et al, 1985) in 254 patients, the thromboembolic-free interval was found to be significantly greater in patients with mechanical prosthetic heart valves treated with warfarin alone compared with dipyridamole-aspirin (p<0.005) and pentoxifylline-aspirin (p<0.05) treated patients. Rates of thromboembolic events in these groups were 2.2, 8.6, and 7.9/100 patient years, respectively. Major bleeding rates were 2.5, 0.0, and 0.9/100 patient years, respectively.

In a prospective, open label, clinical trial (Saour et al, 1990) comparing moderate (INR 2.65) vs. high intensity (INR 9.0) warfarin therapies in 258 patients with mechanical prosthetic heart valves, thromboembolism occurred with similar frequency in the two groups (4.0 and 3.7 events/100 patient years, respectively). Major bleeding was more common in the high intensity group (2.1 events/100 patient years) vs. 0.95 events/100 patient years in the moderate intensity group.

In a randomized trial (Turpie et al, 1988) in 210 patients comparing two intensities of warfarin therapy (INR 2.0-2.25 vs. INR 2.5-4.0) for a three-month period following tissue heart valve replacement, thromboembolism occurred with similar frequency in the two groups (major embolic events 2.0% vs. 1.9%, respectively and minor embolic events 10.8% vs. 10.2%, respectively). Major bleeding complications were more frequent with the higher intensity (major hemorrhages 4.6% vs. none in the lower intensity).

INDICATIONS AND USAGE

COUMADIN is indicated for the prophylaxis and/or treatment of venous thrombosis and its extension, and pulmonary embolism

COUMADIN is indicated for the prophylaxis and/or treatment of the thromboembolic complications associated with atrial fibrillation and/or cardiac valve replacement.

COUMADIN is indicated to reduce the risk of death, recurrent myocardial infarction, and thromboembolic events such as stroke or systemic embolization after myocardial infarction.

CONTRAINDICATIONS

Anticoagulation is contraindicated in any localized or general physical condition or personal circumstance in which the hazard of hemorrhage might be greater than the potential clinical benefits of anticoagulation, such as:

Pregnancy: COUMADIN is contraindicated in women who are or may become pregnant because the drug passes through the placental barrier and may cause fetal hemorrhage to the fetus *in utero*. Furthermore, there have been reports of birth malformations in children born to mothers who have been treated with warfarin during pregnancy.

Embryopathy characterized by nasal hypoplasia with or without stippled epiphyses (chondrodysplasia punctata) has been reported in pregnant women exposed to warfarin during the first trimester. Central nervous system abnormalities also have been reported, including dorsal midline dysplasia characterized by agenesis of the corpus callosum, Dandy-Walker malformation, and midline cerebellar atrophy. Ventral midline dysplasia, characterized by optic atrophy, and eye abnormalities have been observed. Mental retardation, blindness, and other central nervous system abnormalities have been reported in association with second and third trimester exposure. Although rare, teratogenic reports following *in utero* exposure to warfarin include urinary tract anomalies such as single kidney, asplenia, anencephaly, spina bifida, cranial nerve palsy, hydrocephalus, cardiac defects and congenital heart disease, polydactyly, deformities of toes, diaphragmatic hernia, corneal leukoma, cleft palate, cleft lip, schizencephaly, and microcephaly.

Spontaneous abortion and stillbirth are known to occur and a higher risk of fetal mortality is associated with the use of warfarin. Low birth weight and growth retardation have also been reported.

Women of childbearing potential who are candidates for anticoagulant therapy should be carefully evaluated and the indications critically reviewed with the patient if the patient becomes pregnant while taking this drug, she

should be apprised of the potential risks to the fetus, and the possibility of termination of the pregnancy should be discussed in light of those risks

Hemorrhagic tendencies or blood dyscrasias.

Recent or contemplated surgery of: (1) central nervous system; (2) eye; (3) traumatic surgery resulting in large open surfaces.

Bleeding tendencies associated with active ulceration or overt bleeding of: (1) gastrointestinal, genitourinary or respiratory tracts; (2) cerebrovascular hemorrhage; (3) aneurysms-cerebral, dissecting aorta; (4) pericarditis and pericardial effusions; (5) bacterial endocarditis.

Threatened abortion, eclampsia and preeclampsia.

Inadequate laboratory facilities.

Unsupervised patients with senility, alcoholism, or psychosis or other lack of patient cooperation.

Spinal puncture and other diagnostic or therapeutic procedures with potential for uncontrollable bleeding.

Miscellaneous: major regional, lumbar block anesthesia, malignant hypertension and known hypersensitivity to warfarin or to any other components of this product.

WARNINGS

The most serious risks associated with anticoagulant therapy with warfarin sodium are hemorrhage in any tissue or organ and, less frequently (<0.1%), necrosis and/or gangrene of skin and other tissues. The risk of hemorrhage is related to the level of intensity and the duration of anticoagulant therapy. Hemorrhage and necrosis have in some cases been reported to result in death or permanent disability. Necrosis appears to be associated with local thromboses and usually appears within a few days of the start of anticoagulant therapy. In severe cases of necrosis, treatment through debridement or amputation of the affected tissue, limb, breast or penis has been reported. Careful diagnosis is required to determine whether necrosis is caused by an underlying disease. Warfarin therapy should be discontinued when warfarin is suspected to be the cause of developing necrosis and heparin therapy may be considered for anticoagulation. Although various treatments have been attempted, no treatment for necrosis has been considered uniformly effective. See below for information on predisposing conditions. These and other risks associated with anticoagulant therapy must be weighed against the risk of thrombosis or embolization in untreated cases.

It cannot be emphasized too strongly that treatment of each patient is a highly individualized matter. COUMADIN (Warfarin Sodium), a narrow therapeutic range (index) drug, may be affected by factors such as other drugs and dietary Vitamin K. Dosage should be controlled by periodic determinations of PT/INR or other suitable coagulation tests. Determinations of whole blood clotting and bleeding times are not effective measures for control of therapy. Heparin prolongs the one-stage PT. When heparin and COUMADIN are administered concomitantly, refer below to CONVERSION FROM HEPARIN THERAPY for recommendations.

Caution should be observed when COUMADIN is administered in any situation or in the presence of any predisposing condition where added risk of hemorrhage, necrosis, and/or gangrene is present.

Anticoagulation therapy with COUMADIN may enhance the release of atheromatous plaque emboli, thereby increasing the risk of complications from systemic cholesterol microembolization, including the "purple toes syndrome." Discontinuation of COUMADIN therapy is recommended when such phenomena are observed.

Systemic atheroemboli and cholesterol microemboli can present with a variety of signs and symptoms including purple toes syndrome, livedo reticularis, rash, gangrene, abrupt and intense pain in the leg, foot, or toes, foot ulcers, myalgia, penile gangrene, abdominal pain, flank or back pain, hematuria, renal insufficiency, hypertension, cerebral ischemia, spinal cord infarction, pancreatitis, symptoms simulating polyarteritis, or any other sequelae of vascular compromise due to embolic occlusion. The most commonly involved visceral organs are the kidneys followed by the pancreas, spleen, and liver. Some cases have progressed to necrosis or death.

Purple toes syndrome is a complication of oral anticoagulation characterized by a dark, purplish or mottled color of the toes, usually occurring between 3-10 weeks, or later, after the initiation of therapy with warfarin or related compounds. Major features of this syndrome include purple color of plantar surfaces and sides of the toes that blanches on moderate pressure and fades with elevation of the legs; pain and tenderness of the toes; waxing and waning of the color over time. While the purple toes syndrome is reported to be reversible, some cases progress to gangrene or necrosis which may require debridement of the affected area, or may lead to amputation.

Heparin-Induced thrombocytopenia: COUMADIN should be used with caution in patients with heparin-induced thrombocytopenia and deep venous thrombosis. Cases of venous limb ischemia, necrosis, and gangrene have occurred in patients with heparin-induced thrombocytopenia and deep venous thrombosis when heparin treatment was discontinued and warfarin therapy was started or continued. In some patients sequelae have included amputation of the involved area and/or death (Warkentin et al, 1997).

A severe elevation (>50 seconds) in activated partial thromboplastin time (aPTT) with a PT/INR in the desired range has been identified as an indication of increased risk of postoperative hemorrhage.

The decision to administer anticoagulants in the following conditions must be based upon clinical judgment in which the risks of anticoagulant therapy are weighed against the benefits:

Lactation: Based on very limited published data, warfarin has not been detected in the breast milk of mothers treated with warfarin. The same limited published data reports that some breast-fed infants, whose mothers were treated with warfarin, had prolonged prothrombin times, although not as prolonged as those of the mothers. The decision to breast-feed should be undertaken only after careful consideration of the available alternatives. Women who are breast-feeding and anticoagulated with warfarin should be very carefully monitored so that recommended PT/INR values are not exceeded. It is prudent to perform coagulation tests and to evaluate vitamin K status in infants at risk for bleeding tendencies before advising women taking warfarin to breast-feed. Effects in premature infants have not been evaluated.

Severe to moderate hepatic or renal insufficiency.

Infectious diseases or disturbances of intestinal flora: sprue, antibiotic therapy.

Trauma which may result in internal bleeding.

Surgery or trauma resulting in large exposed raw surfaces.

Indwelling catheters.

Severe to moderate hypertension.

Known or suspected deficiency in protein C mediated anticoagulant response: Hereditary or acquired deficiencies of protein C or its cofactor, protein S, have been associated with tissue necrosis following warfarin administration. Not all patients with these conditions develop necrosis, and tissue necrosis occurs in patients without these deficiencies. Inherited resistance to activated protein C has been described in many patients with venous thromboembolic disorders but has not yet been evaluated as a risk factor for tissue necrosis. The risk associated with these conditions, both for recurrent thrombosis and for adverse reactions, is difficult to evaluate since it does not appear to be the same for everyone. Decisions about testing and therapy must be made on an individual basis. It has been reported that concomitant anticoagulation therapy with heparin for 5 to 7 days during initiation of therapy with COUMADIN may minimize the incidence of tissue necrosis. Warfarin therapy should be discontinued when warfarin is suspected to be the cause of developing necrosis and heparin therapy may be considered for anticoagulation.

Miscellaneous: polycythemia vera, vasculitis, and severe diabetes.

Minor and severe allergic/hypersensitivity reactions and anaphylactic reactions have been reported.

In patients with acquired or inherited warfarin resistance, decreased therapeutic responses to COUMADIN have been reported. Exaggerated therapeutic responses have been reported in other patients.

Patients with congestive heart failure may exhibit greater than expected PT/INR response to COUMADIN, thereby requiring more frequent laboratory monitoring, and reduced doses of COUMADIN.

Concomitant use of anticoagulants with streptokinase or urokinase is not recommended and may be hazardous. (Please note recommendations accompanying these preparations.)

PRECAUTIONS

Periodic determination of PT/INR or other suitable coagulation test is essential.

Numerous factors, alone or in combination, including travel, changes in diet, environment, physical state and medications, including botanicals, may influence response of the patient to anticoagulants. It is generally good practice to monitor the patient's response with additional PT/INR determinations in the period immediately after discharge from the hospital, and whenever other medications, including botanicals, are initiated, discontinued or taken irregularly. The following factors are listed for reference; however, other factors may also affect the anticoagulant response.

Drugs may interact with COUMADIN (Warfarin Sodium) through pharmacodynamic or pharmacokinetic mechanisms. Pharmacodynamic mechanisms for drug interactions with COUMADIN are synergism (impaired hemostasis, reduced clotting factor synthesis), competitive antagonism (vitamin K), and altered physiologic control loop for vitamin K metabolism (hereditary resistance). Pharmacokinetic mechanisms for drug interactions with COUMADIN are mainly enzyme induction, enzyme inhibition, and reduced plasma protein binding. It is important to note that some drugs may interact by more than one mechanism.

The following factors, alone or in combination, may be responsible for INCREASED PT/INR response:

ENDOGENOUS FACTORS:

blood dyscrasias — see CONTRAINDICATIONS cancer collagen vascular disease congestive heart failure	diarrhea elevated temperature hepatic disorders infectious hepatitis jaundice	hyperthyroidism poor nutritional state steatorrhea vitamin K deficiency
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EXOGENOUS FACTORS:

Potential drug interactions with COUMADIN are listed below by drug class and by specific drugs.

Classes of Drugs		
5-lipoyltransferase inhibitor Adrenergic Stimulants, Central Alcohol Abuse Reduction Preparations Analgesics Anesthetics, Inhalation Antiandrogen Antiarrhythmics* Antibiotics* Aminoglycosides (oral) Cephalosporins, parenteral Macrolides Miscellaneous Penicillins, intravenous, high dose Quinolones (fluoroquinolones) Sulfonamides, long acting Tetracyclines Anticoagulants Anticonvulsants* Antidepressants* Antimalarial Agents Antineoplastics*	Antiparasitic/Antimicrobials Antiplatelet Drugs/Effects Antithyroid Drugs* Beta-Adrenergic Blockers Cholelitholytic Agents Diabetes Agents, Oral Diuretics* Fungal Medications, Intravaginal, Systemic* Gastric Acidity and Peptic Ulcer Agents* Gastrointestinal Prokinetic Agents Ulcerative Colitis Agents Gout Treatment Agents Hemorrhologic Agents Hepatotoxic Drugs Hyperglycemic Agents Hypertensive Emergency Agents Hypnotics* Hypolipidemics* Bile Acid-Binding Resins* Fibric Acid Derivatives	HMG-CoA Reductase Inhibitors* Leukotriene Receptor Antagonist Monoamine Oxidase Inhibitors Narcotics, prolonged Nonsteroidal Anti-Inflammatory Agents Proton Pump Inhibitors Psychostimulants Pyrazolones Salicylates Selective Serotonin Reuptake Inhibitors Steroids, Adrenocortical* Steroids, Anabolic (17-Alkyl Testosterone Derivatives) Thrombolytics Thyroid Drugs Tuberculosis Agents* Uricosuric Agents Vaccines Vitamins*

Specific Drugs Reported

acetaminophen alcohol* allopurinol aminosalicylic acid amiodarone HCl aspirin atorvastatin* azithromycin capecitabine cefamandole cefazolin cefoperazone cefotetan cefotaxim ceftriaxone celecoxib cerivastatin chenodiol chloramphenicol chlorthal hydrate* chlorpropamide cholestyramine* cimetidine ciprofloxacin cispripide clarithromycin clofibrate COUMADIN overdose cyclophosphamide* danazol dextran dextrothroxide diazoxide diclofenac dicumarol diflunisal disulfiram doxycycline erythromycin esomeprazole ethacrynic acid fenofibrate fenopropfen flucanazole	fluorouracil flouxetine flutamide fluvastatin fluvoxamine gemfibrozil glucagon halothane heparin ibuprofen ifosfamide indomethacin influenza virus vaccine itraconazole katoprofen katorolac lansoprazole levamisole levofloxacin levothyroxine liothyronine lovastatin metenamic acid methimazole* methyldopa methylphenidate methylsalicylate ointment (topical) metronidazole miconazole (intravaginal, systemic) moricizine hydrochloride* naldixic acid naproxen neomycin norfloxacin ofloxacin olsalezine omeprazole oxandrolone oxaprozin oxymetholone pantoprazole	peroxetone penicillin G, intravenous pentoxifylline phenylbutazone phenytoin* piperacillin piroxicam pravastatin* prednisone* propafenone propoxyphene propranolol propylthiouracil* quinidine quinine rabeprazole ranitidine* rofecoxib sertraline simvastatin stanazolol streptokinase sulfamethoxazole sulfipyrazole sulfisoxazole sulindac tamoxifen tetracycline thyroid ticarcillin ticlopidine tissue plasminogen activator (t-PA) tolbutamide tramadol trimethoprim/sulfamethoxazole urokinase valproate vitamin E zafirlucast zileuton
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also: other medications affecting blood elements which may modify hemostasis
dietary deficiencies
prolonged hot weather
unreliable PT/INR determinations

* Increased and decreased PT/INR responses have been reported.

The following factors, alone or in combination, may be responsible for DECREASED PT/INR response:

ENDOGENOUS FACTORS:

edema hereditary coumarin resistance hyperlipemia	hypothyroidism nephrotic syndrome
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EXOGENOUS FACTORS:

Potential drug interactions with COUMADIN (Warfarin Sodium) are listed below by drug class and by specific drugs.

Classes of Drugs		
Adrenal Cortical Steroid Inhibitors Antacids Anti-anxiety Agents Antiarrhythmics ¹ Antibiotics ² Anticonvulsants ³ Antidepressants ⁴ Antihistamines ⁵ Antineoplastics ⁶ Antipsychotic Medications	Antithyroid Drugs ⁷ Barbiturates Diuretics ⁸ Enteral Nutritional Supplements Fungal Medications, Systemic ⁹ Gastric Acidity and Peptic Ulcer Agents ¹⁰ Hypnotics ¹¹ Hypolipidemics ¹² Bile Acid-Binding Resins ¹³	HMG-CoA Reductase Inhibitors ¹⁴ Immunosuppressives Oral Contraceptives, Estrogen Containing Selective Estrogen Receptor Modulators Steroids, Adrenocortical ¹⁵ Tuberculosis Agents ¹⁶ Vitamins ¹⁷
Specific Drugs Reported		
alcohol ¹⁸ aminoglycoside amobarbital atorvastatin ¹⁹ azathioprine butabarbital butalbital carbamazepine chloral hydrate ²⁰ chlorthalidone chlordiazepoxide chlorzoxazone cholestyramine ²¹ clozapine corticotropin cortisone	COUMADIN underdosage cyclophosphamide ²² dicloxacillin ethchlorvynol gabutinamide griseofulvin haloperidol meprobamate 6-mercaptopurine methimazole ²³ moricizine hydrochloride ²⁴ nafcillin paraldehyde pentobarbital phenobarbital	phenytoin ²⁵ pravastatin ²⁶ prednisone ²⁷ primidone propylthiouracil ²⁸ raloxifene ranitidine ²⁹ rifampin secobarbital siproinolactone sucralfate trazodone vitamin C (high dose) vitamin K

also: diet high in vitamin K
unreliable PT/INR determinations
¹⁸Increased and decreased PT/INR responses have been reported.

Because a patient may be exposed to a combination of the above factors, the net effect of COUMADIN on PT/INR response may be unpredictable. More frequent PT/INR monitoring is therefore advisable. Medications of unknown interaction with coumarins are best regarded with caution. When these medications are started or stopped, more frequent PT/INR monitoring is advisable.

It has been reported that concomitant administration of warfarin and ticlopidine may be associated with cholestatic hepatitis.

Botanical (Herbal) Medicines: Caution should be exercised when botanical medicines (botanicals) are taken concomitantly with COUMADIN. Few adequate, well-controlled studies exist evaluating the potential for metabolic and/or pharmacologic interactions between botanicals and COUMADIN. Due to a lack of manufacturing standardization with botanical medicinal preparations, the amount of active ingredients may vary. This could further confound the ability to assess potential interactions and effects on anticoagulation. It is good practice to monitor the patient's response with additional PT/INR determinations when initiating or discontinuing botanicals.

Specific botanicals reported to affect COUMADIN therapy include the following:

- Bromelain, danshen, dong quai (*Angelica sinensis*), garlic, Ginkgo biloba, ginseng, and cranberry products are associated most often with an INCREASE in the effects of COUMADIN.
- Coenzyme Q₁₀ (ubidecarenone) and St. John's wort are associated most often with a DECREASE in the effects of COUMADIN.

Some botanicals may cause bleeding events when taken alone (e.g., garlic and Ginkgo biloba) and may have anticoagulant, antiplatelet, and/or fibrinolytic properties. These effects would be expected to be additive to the anticoagulant effects of COUMADIN. Conversely, other botanicals may have coagulant properties when taken alone or may decrease the effects of COUMADIN.

Some botanicals that may affect coagulation are listed below for reference; however, this list should not be considered all-inclusive. Many botanicals have several common names and scientific names. The most widely recognized common botanical names are listed.

Botanicals that contain coumarins with potential anticoagulant effects:		
Alfalfa Angelica (Dong Quai) Aniseed Arnica Asa Foetida Bogbean ¹ Boldo Buchu Capsicum ² Cassia ³	Calery Chamomile (German and Roman) Dandelion ⁴ Fenugreek Horse Chestnut Horse-radish Licorice ⁵ Meadowsweet ⁶ Nettle	Parsley Passion Flower Prickly Ash (Northern) Quassia Red Clover Sweet Clover Sweet Woodruff Tonka Beans Wild Carrot Wild Lettuce

Miscellaneous botanicals with anticoagulant properties:		
Bladder Wrack (<i>Fucus</i>)	Pau d'arco	

Botanicals that contain salicylate and/or have antiplatelet properties:		
Agrimony ¹ Aloe Gel Aspen Black Cohosh Black Haw Bogbean ² Cassia ³ Clove	Dandelion ⁴ Feverfew Garlic ⁵ German Sarsaparilla Ginger Ginkgo Biloba Ginseng (<i>Panax</i>) ⁶ Licorice ⁷	Meadowsweet ⁸ Onion ⁹ Policosanol Poplar Senega Tamarind Willow Wintergreen

Botanicals with fibrinolytic properties:		
Bromelain Capsicum ¹	Garlic ² Ginseng (<i>Panax</i>) ³	Inositol Nicotinate Onion ⁴

Botanicals with coagulant properties:		
Agrimony ¹ Goldenseal	Mistletoe Yarrow	

- ¹ Contains coumarins and salicylate.
- ² Contains coumarins and has fibrinolytic properties.
- ³ Contains coumarins and has antiplatelet properties.
- ⁴ Contains salicylate and has coagulant properties.
- ⁵ Has antiplatelet and fibrinolytic properties.

Effect on Other Drugs: Coumarins may also affect the action of other drugs. Hypoglycemic agents (chlorpropamide and tolbutamide) and anticonvulsants (phenytoin and phenobarbital) may accumulate in the body as a result of interference with either their metabolism or excretion.

Special Risk Patients: COUMADIN (Warfarin Sodium) is a narrow therapeutic range (index) drug, and caution should be observed when warfarin sodium is administered to certain patients such as the elderly or debilitated or when administered in any situation or physical condition where added risk of hemorrhage is present.

Intramuscular (I.M.) injections of concomitant medications should be confined to the upper extremities which permits easy access for manual compression, inspections for bleeding and use of pressure bandages.

Caution should be observed when COUMADIN (or warfarin) is administered concomitantly with nonsteroidal anti-inflammatory drugs (NSAIDs), including aspirin, to be certain that no change in anticoagulation dosage is required. In addition to specific drug interactions that might affect PT/INR, NSAIDs, including aspirin, can inhibit platelet aggregation, and can cause gastrointestinal bleeding, peptic ulceration and/or perforation.

Acquired or inherited warfarin resistance should be suspected if large daily doses of COUMADIN are required to maintain a patient's PT/INR within a normal therapeutic range.

Information for Patients: The objective of anticoagulant therapy is to decrease the clotting ability of the blood so that thrombosis is prevented, while avoiding spontaneous bleeding. Effective therapeutic levels with minimal complications are in part dependent upon cooperative and well-instructed patients who communicate effectively with their physician. Patients should be advised: Strict adherence to prescribed dosage schedule is necessary. Do not take or discontinue any other medication, including salicylates (e.g., aspirin and topical analgesics), other over-the-counter medications, and botanical (herbal) products (e.g., bromelain, coenzyme Q₁₀, danshen, dong quai, garlic, Ginkgo biloba, ginseng, and St. John's wort) except on advice of the physician. Avoid alcohol consumption. Do not take COUMADIN during pregnancy and do not become pregnant while taking it (see CONTRAINDICATIONS). Avoid any activity or sport that may result in traumatic injury. Prothrombin time tests and regular visits to physician or clinic are needed to monitor therapy. Carry identification stating that COUMADIN is being taken. If the prescribed dose of COUMADIN is forgotten, notify the physician immediately. Take the dose as soon as possible on the same day but do not take a double dose of COUMADIN the next day to make up for missed doses. The amount of vitamin K in food may affect therapy with COUMADIN. Eat a normal, balanced diet maintaining a consistent amount of vitamin K. Avoid drastic changes in dietary habits, such as eating large amounts of green leafy vegetables. You should also avoid intake of cranberry juice or any other cranberry products. Notify your health care provider if any of these products are part of your normal diet. Contact physician to report any illness, such as diarrhea, infection or fever. Notify physician immediately if any unusual bleeding or symptoms occur. Signs and symptoms of bleeding include: pain, swelling or discomfort, prolonged bleeding from cuts, increased menstrual flow or vaginal bleeding, nosebleeds, bleeding of gums from brushing, unusual bleeding or bruising, red or dark brown urine, red or tar black stools, headache, dizziness, or weakness. If therapy with COUMADIN is discontinued, patients should be cautioned that the anticoagulant effects of COUMADIN may persist for about 2 to 5 days. Patients should be informed that all warfarin sodium, USP, products represent the same medication, and should not be taken concomitantly, as overdose may result.

Carcinogenesis, Mutagenesis, Impairment of Fertility: Carcinogenicity and mutagenicity studies have not been performed with COUMADIN. The reproductive effects of COUMADIN have not been evaluated.

Use in Pregnancy: Pregnancy Category X - See CONTRAINDICATIONS.

Pediatric Use: Safety and effectiveness in pediatric patients below the age of 18 have not been established, in randomized, controlled clinical trials. However, the use of COUMADIN in pediatric patients is well-documented for the prevention and treatment of thromboembolic events. Difficulty achieving and maintaining therapeutic PT/INR ranges in the pediatric patient has been reported. More frequent PT/INR determinations are recommended because of possible changing warfarin requirements.

Geriatric Use: Patients 60 years or older appear to exhibit greater than expected PT/INR response to the anticoagulant effects of warfarin (see CLINICAL PHARMACOLOGY). COUMADIN is contraindicated in any unsupervised patient with senility. Caution should be observed with administration of warfarin sodium to elderly patients in any situation or physical condition where added risk of hemorrhage is present. Lower initiation and maintenance doses of COUMADIN are recommended for elderly patients (see DOSAGE AND ADMINISTRATION).

ADVERSE REACTIONS

Potential adverse reactions to COUMADIN may include:

- Fatal or nonfatal hemorrhage from any tissue or organ. This is a consequence of the anticoagulant effect. The signs, symptoms, and severity will vary according to the location and degree or extent of the bleeding. Hemorrhagic complications may present as paralysis; paresthesia; headache, chest, abdomen, joint, muscle or other pain; dizziness; shortness of breath, difficult breathing or swallowing; unexplained swelling; weakness; hypotension; or unexplained shock. Therefore, the possibility of hemorrhage should be considered in evaluating the condition of any anticoagulated patient with complaints which do not indicate an obvious diagnosis. Bleeding during anticoagulant therapy does not always correlate with PT/INR. (See OVERDOSAGE: Treatment.)
- Bleeding which occurs when the PT/INR is within the therapeutic range warrants diagnostic investigation since it may unmask a previously unsuspected lesion, e.g., tumor, ulcer, etc.
- Necrosis of skin and other tissues. (See WARNINGS.)
- Adverse reactions reported infrequently include: hypersensitivity/allergic reactions, systemic cholesterol microembolization, purple toes syndrome, hepatitis, cholestatic hepatic injury, jaundice, elevated liver enzymes, vasculitis, edema, fever, rash, dermatitis, including bullous eruptions, urticaria, abdominal pain including cramping, flatulence/bloating, fatigue, lethargy, malaise, asthenia, nausea, vomiting, diarrhea, pain, headache, dizziness, taste perversion, pruritus, alopecia, cold intolerance, and paresthesia including feeling cold and chills.

Rare events of tracheal or tracheobronchial calcification have been reported in association with long-term warfarin therapy. The clinical significance of this event is unknown. Priapism has been associated with anticoagulant administration, however, a causal relationship has not been established.

OVERDOSAGE

Signs and Symptoms: Suspected or overt abnormal bleeding (e.g., appearance of blood in stools or urine, hematuria, excessive menstrual bleeding, melena, petechiae, excessive bruising or persistent oozing from superficial injuries) are early manifestations of anticoagulation beyond a safe and satisfactory level.

Treatment: Excessive anticoagulation, with or without bleeding, may be controlled by discontinuing COUMADIN therapy and if necessary, by administration of oral or parenteral vitamin K₁. (Please see recommendations accompanying vitamin K₁ preparations prior to use.)

Such use of vitamin K₁ reduces response to subsequent COUMADIN (Warfarin Sodium) therapy. Patients may return to a pretreatment thrombotic status following the rapid reversal of a prolonged PT/INR. Resumption of COUMADIN administration reverses the effect of vitamin K₁ and a therapeutic PT/INR can again be obtained by careful dosage adjustment. If rapid anticoagulation is indicated, heparin may be preferable for initial therapy.

If minor bleeding of progress to major bleeding, give 5 to 25 mg (rarely up to 50 mg) parenteral vitamin K₁. In emergency situations of severe hemorrhage, clotting factors can be returned to normal by administering 200 to 500 mL of fresh whole blood or fresh frozen plasma, or by giving commercial Factor IX complex.

A risk of hepatitis and other viral diseases is associated with the use of these blood products; Factor IX complex is also associated with an increased risk of thrombosis. Therefore, these preparations should be used only in exceptional or life-threatening bleeding episodes secondary to COUMADIN (Warfarin Sodium) overdosage.

Purified Factor IX preparations should not be used because they cannot increase the levels of prothrombin, Factor VII and Factor X which are also depressed along with the levels of Factor IX as a result of COUMADIN treatment. Packed red blood cells may also be given if significant blood loss has occurred. Infusions of blood or plasma should be monitored carefully to avoid precipitating pulmonary edema in elderly patients or patients with heart disease.

DOSE AND ADMINISTRATION
The dosage and administration of COUMADIN must be individualized for each patient according to the particular patient's PT/INR response to the drug. The dosage should be adjusted based upon the patient's PT/INR. (See LABORATORY CONTROL below for full discussion on INR.)

Venous Thromboembolism (including pulmonary embolism): Available clinical evidence indicates that an INR of 2.0-3.0 is sufficient for prophylaxis and treatment of venous thromboembolism and minimizes the risk of hemorrhage associated with higher INRs. In patients with risk factors for recurrent venous thromboembolism including venous insufficiency, inherited thrombophilia, idiopathic venous thromboembolism, and a history of thrombotic events, consideration should be given to longer term therapy (Schulman et al, 1995 and Schulman et al, 1997).

Atrial Fibrillation: Five recent clinical trials evaluated the effects of warfarin in patients with non-valvular atrial fibrillation (AF). Meta-analysis findings of these studies revealed that the effects of warfarin in reducing thromboembolic events including stroke were similar at either moderately high INR (2.0-4.5) or low INR (1.4-3.0). There was a significant reduction in minor bleeds at the low INR. Similar data from clinical studies in valvular atrial fibrillation patients are not available. The trials in non-valvular atrial fibrillation support the American College of Chest Physicians' (ACCP) recommendation that an INR of 2.0-3.0 be used for long term warfarin therapy in appropriate AF patients.

Post-Myocardial Infarction: In post-myocardial infarction patients, COUMADIN therapy should be initiated early (2-4 weeks post-infarction) and dosage should be adjusted to maintain an INR of 2.5-3.5 long-term. The recommendation is based on the results of the WARIS study in which treatment was initiated 2 to 4 weeks after the infarction. In patients thought to be at an increased risk of bleeding complications or on aspirin therapy, maintenance of COUMADIN therapy at the lower end of this INR range is recommended.

Mechanical and Bioprosthetic Heart Valves: In patients with mechanical heart valve(s), long term prophylaxis with warfarin to an INR of 2.5-3.5 is recommended. In patients with bioprosthetic heart valve(s), based on limited data, the American College of Chest Physicians recommends warfarin therapy to an INR of 2.0-3.0 for 12 weeks after valve insertion. In patients with additional risk factors such as atrial fibrillation or prior thromboembolism, consideration should be given for longer term therapy.

Recurrent Systemic Embolism: In cases where the risk of thromboembolism is great, such as in patients with recurrent systemic embolism, a higher INR may be required.

An INR of greater than 4.0 appears to provide no additional therapeutic benefit in most patients and is associated with a higher risk of bleeding.

Initial Dosage: The dosing of COUMADIN must be individualized according to patient's sensitivity to the drug as indicated by the PT/INR. Use of a large loading dose may increase the incidence of hemorrhagic and other complications, does not offer more rapid protection against thrombi formation, and is not recommended. Lower initiation and maintenance doses are recommended for elderly and/or debilitated patients and patients with potential to exhibit greater than expected PT/INR response to COUMADIN (see PRECAUTIONS). Based on limited data, Asian patients may also require lower initiation and maintenance doses of COUMADIN (see CLINICAL PHARMACOLOGY). It is recommended that COUMADIN therapy be initiated with a dose of 2 to 5 mg per day with dosage adjustments based on the results of PT/INR determinations.

Maintenance: Most patients are satisfactorily maintained at a dose of 2 to 10 mg daily. Flexibility of dosage is provided by breaking scored tablets in half. The individual dose and interval should be gauged by the patient's prothrombin response.

Duration of Therapy: The duration of therapy in each patient should be individualized. In general, anticoagulant therapy should be continued until the danger of thrombosis and embolism has passed.

Missed Dose: The anticoagulant effect of COUMADIN persists beyond 24 hours. If the patient forgets to take the prescribed dose of COUMADIN at the scheduled time, the dose should be taken as soon as possible on the same day. The patient should not take the missed dose by doubling the daily dose to make up for missed doses, but should refer back to his or her physician.

Intravenous Route of Administration: COUMADIN for injection provides an alternate administration route for patients who cannot receive oral drugs. The IV dosages would be the same as those that would be used orally if the patient could take the drug by the oral route. COUMADIN for injection should be administered as a slow bolus injection over 1 to 2 minutes into a peripheral vein. It is not recommended for intramuscular administration. The vial should be reconstituted with 2.7 mL of sterile Water for Injection and inspected for particulate matter and discoloration immediately prior to use. Do not use if either particulate matter and/or discoloration is noted. After reconstitution, COUMADIN for injection is chemically and physically stable for 4 hours at room temperature. It does not contain any antimicrobial preservative and, thus, care must be taken to assure the sterility of the prepared solution. The vial is not recommended for multiple use and unused solution should be discarded.

LABORATORY CONTROL The PT reflects the depression of vitamin K dependent Factors VII, X and II. There are several modifications of the one-stage PT and the physician should become familiar with the specific method used in his laboratory. The degree of anticoagulation indicated by any range of PTs may be altered by the type of thromboplastin used; the appropriate therapeutic range must be based on the experience of each laboratory. The PT should be determined daily after the administration of the initial dose until PT/INR results stabilize in the therapeutic range. Intervals between subsequent PT/INR determinations should be based upon the physician's judgment of the patient's reliability and response to COUMADIN in order to maintain the individual within the therapeutic range. Acceptable intervals for PT/INR determinations are normally within the range of one to four weeks after a stable dosage has been determined. To ensure adequate control, it is recommended that additional PT tests are done when other warfarin products are interchanged with warfarin sodium tablets, USP, as well as whenever other medications are initiated, discontinued, or taken irregularly (see PRECAUTIONS).

Different thromboplastin reagents vary substantially in their sensitivity to sodium warfarin-induced effects on PT. To define the appropriate therapeutic regimen it is important to be familiar with the sensitivity of the thromboplastin reagent used in the laboratory and its relationship to the International Reference Preparation (IRP), a sensitive thromboplastin reagent prepared from human brain.

A system of standardizing the PT in oral anticoagulant control was introduced by the World Health Organization in 1983. It is based upon the determination of an International Normalized Ratio (INR) which provides a common basis for communication of PT results and interpretations of therapeutic ranges. The INR system of reporting is based on a logarithmic relationship between the PT ratios of the test and reference preparation. The INR is the PT ratio that would be obtained if the International Reference Preparation (IRP), which has an ISI of 1.0, was used to perform the test. Early clinical studies of oral anticoagulants, which formed the basis for recommended therapeutic ranges of 1.5 to 2.5 times control mean normal PT, used sensitive human brain thromboplastin. When using the less sensitive rabbit brain thromboplastins commonly employed in PT assays today, adjustments must be made to the targeted PT range that reflect this decrease in sensitivity.

The INR can be calculated as: $INR = (\text{observed PT ratio})^{ISI}$ where the ISI (International Sensitivity Index) is the correction factor in the equation that relates the PT ratio of the local reagent to the reference preparation and is a measure of the sensitivity of a given thromboplastin to reduction of vitamin K-dependent coagulation factors; the lower the ISI, the more "sensitive" the reagent and the closer the derived INR will be to the observed PT ratio.¹

The proceedings and recommendations of the 1992 National Conference on Antithrombotic Therapy²⁻⁴ review and evaluate issues related to oral anticoagulant therapy and the sensitivity of thromboplastin reagents and provide additional guidelines for defining the appropriate therapeutic regimen.

The conversion of the INR to PT ratios for the less-intense (INR 2.0-3.0) and more intense (INR 2.5-3.5) therapeutic range recommended by the ACCP for thromboplastins over a range of ISI values is shown in Table 3.⁵

TABLE 3: Relationship Between INR and PT Ratios For Thromboplastins With Different ISI Values (Sensitivities)

	PT RATIOS				
	ISI 1.0	ISI 1.4	ISI 1.8	ISI 2.3	ISI 2.8
INR=2.0-3.0	2.0-3.0	1.6-2.2	1.5-1.8	1.4-1.6	1.3-1.5
INR=2.5-3.5	2.5-3.5	1.9-2.4	1.7-2.0	1.5-1.7	1.4-1.6

TREATMENT DURING DENTISTRY AND SURGERY The management of patients who undergo dental and surgical procedures requires close liaison between attending physicians, surgeons and dentists. PT/INR determination is recommended just prior to any dental or surgical procedure. In patients undergoing minimal invasive procedures who must be anticoagulated prior to, during, or immediately following these procedures, adjusting the dosage of COUMADIN (Warfarin Sodium) to maintain the PT/INR at the low end of the therapeutic range may safely allow for continued anticoagulation. The operative site should be sufficiently limited and accessible to permit the effective use of local procedures for hemostasis. Under these conditions, dental and minor surgical procedures may be performed without undue risk of hemorrhage. Some dental or surgical procedures may necessitate the interruption of COUMADIN therapy. When discontinuing COUMADIN even for a short period of time, the benefits and risks should be strongly considered.

CONVERSION FROM HEPARIN THERAPY Since the anticoagulant effect of COUMADIN is delayed, heparin is preferred initially for rapid anticoagulation. Conversion to COUMADIN may begin concomitantly with heparin therapy or may be delayed 3 to 6 days. To ensure continuous anticoagulation, it is advisable to continue full dose heparin therapy and that COUMADIN therapy be overlapped with heparin for 4 to 5 days, until COUMADIN has produced the desired therapeutic response as determined by PT/INR. When COUMADIN has produced the desired PT/INR or prothrombin activity, heparin may be discontinued.

COUMADIN may increase the aPTT test, even in the absence of heparin. During initial therapy with COUMADIN, the interference with heparin anticoagulation is of minimal clinical significance.

As heparin may affect the PT/INR, patients receiving both heparin and COUMADIN should have blood for PT/INR determination drawn at least:
 • 5 hours after the last IV bolus dose of heparin, or
 • 4 hours after cessation of a continuous IV infusion of heparin, or
 • 24 hours after the last subcutaneous heparin injection.

HOW SUPPLIED
Tablets: For oral use, single scored with one face imprinted numerically with 1, 2, 2-1/2, 3, 4, 5, 6, 7-1/2 or 10 superimposed and inscribed with "COUMADIN" and with the opposite face plain. COUMADIN is available in bottles and Hospital Unit-Dose Blister Packages with potencies and colors as follows:

	100's	1000's	Hospital Unit-Dose Blister Package of 100
1 mg pink	NDC 0056-0169-70	NDC 0056-0169-90	NDC 0056-0169-75
2 mg lavender	NDC 0056-0170-70	NDC 0056-0170-90	NDC 0056-0170-75
2-1/2 mg green	NDC 0056-0176-70	NDC 0056-0176-90	NDC 0056-0176-75
3 mg tan	NDC 0056-0188-70	NDC 0056-0188-90	NDC 0056-0188-75
4 mg blue	NDC 0056-0168-70	NDC 0056-0168-90	
5 mg peach	NDC 0056-0172-70	NDC 0056-0172-90	NDC 0056-0172-75
6 mg teal	NDC 0056-0189-70	NDC 0056-0189-90	NDC 0056-0189-75
7-1/2 mg yellow	NDC 0056-0173-70		
10 mg white (Dye Free)	NDC 0056-0174-70		

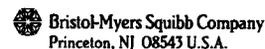
Protect from light. Store at controlled room temperature (59°-86°F, 15°-30°C). Dispense in a tight, light-resistant container as defined in the USP.

Hospital Unit-Dose Blister Packages are to be stored in carton until contents have been used.
 Injection: Available for intravenous use only. Not recommended for intramuscular administration. Reconstitute with 2.7 mL of sterile Water for Injection to yield 2 mg/mL. Net contents 5.4 mg lyophilized powder. Maximum yield 2.5 mL.
 5 mg vial (box of 6) NDC 0590-0324-35

Protect from light. Keep vial in box until used. Store at controlled room temperature (59°-86°F, 15°-30°C). After reconstitution, store at controlled room temperature (59°-86°F, 15°-30°C) and use within 4 hours. Do not refrigerate. Discard any unused solution.

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ATTACHMENT-2
Labeling for the Generic product (Warfarin Sodium Solution)

Anticoagulant

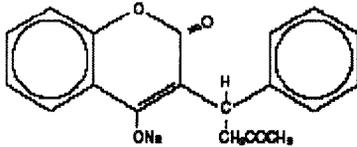
Rx only

WARFARIN SODIUM SOLUTION

(Warfarin Sodium, USP)

DESCRIPTION

WARFARIN SODIUM SOLUTION is an anticoagulant which acts by inhibiting vitamin K-dependent coagulation factors. Chemically, it is 3-(*o*-acetonylbenzyl)-4-hydroxycoumarin and is a racemic mixture of the R- and S-enantiomers. Crystalline warfarin sodium is an isopropanol clathrate. The crystallization of warfarin sodium virtually eliminates trace impurities present in amorphous warfarin. Its empirical formula is C₁₉H₁₅NaO₄, and its structural formula may be represented by the following:



Crystalline warfarin sodium occurs as a white, odorless, crystalline powder, is discolored by light and is very soluble in water; freely soluble in alcohol; very slightly soluble in chloroform and in ether.

WARFARIN SODIUM SOLUTION for oral use also contain:

- 100mM sodium phosphate buffer (pH 8.2)
- glycerin
- ethyl alcohol
- warfarin sodium (isopropanol clathrate)
- FD&C Yellow #6

CLINICAL PHARMACOLOGY

WARFARIN SODIUM SOLUTION and other coumarin anticoagulants act by inhibiting the synthesis of vitamin K dependent clotting factors, which include Factors II, VII, IX and X, and the anticoagulant proteins C and S. Half-lives of these clotting factors are as follows: Factor II - 60 hours, VII - 4-6 hours, IX - 24 hours, and X - 48-72 hours. The half-lives of proteins C and S are approximately 8 hours and 30 hours, respectively. The resultant *in vivo* effect is a sequential depression of Factors VII, IX, X and II activities. Vitamin K is an essential cofactor for the post ribosomal synthesis of the vitamin K dependent clotting factors. The vitamin promotes the biosynthesis of γ -carboxyglutamic acid residues in the proteins which are essential for biological activity. Warfarin is thought to interfere with clotting factor synthesis by inhibition of the regeneration of vitamin K1 epoxide. The degree of depression is dependent upon the dosage administered. Therapeutic doses of warfarin decrease the total amount of the active form of each vitamin K dependent clotting factor made by the liver by approximately 30% to 50%.

An anticoagulation effect generally occurs within 24 hours after drug administration. However, peak anticoagulant effect may be delayed 72 to 96 hours. The duration of action of a single dose of racemic warfarin is 2 to 5 days. The effects of WARFARIN SODIUM SOLUTION may become more pronounced as effects of daily maintenance doses overlap. Anticoagulants have no direct effect on an established thrombus, nor do they reverse ischemic tissue damage. However, once a thrombus has occurred, the goal of anticoagulant treatment is to prevent further extension of the formed clot and prevent secondary thromboembolic complications which may result in serious and possibly fatal sequelae.

Pharmacokinetics: WARFARIN SODIUM SOLUTION is a racemic mixture of the R- and S-enantiomers. The S-enantiomer exhibits 2-5 times more anticoagulant activity than the R-enantiomer in humans, but generally has a more rapid clearance.

Absorption: WARFARIN SODIUM SOLUTION is essentially completely absorbed after oral administration with peak concentration generally attained within the first 4 hours.

Distribution: Warfarin distributes into a relatively small apparent volume of distribution of about 0.14 liter/kg. A distribution phase lasting 6 to 12 hours is distinguishable after oral administration of an aqueous solution. Using a one compartment model, and assuming complete bioavailability, estimates of the volumes of distribution of R- and S-warfarin are similar to each other and to that of the racemate. Concentrations in fetal plasma approach the maternal values, but warfarin has not been found in human milk (see **WARNINGS: Lactation**). Approximately 99% of the drug is bound to plasma proteins.

Metabolism: The elimination of warfarin is almost entirely by metabolism. WARFARIN SODIUM SOLUTION is stereoselectively metabolized by

hepatic microsomal enzymes (cytochrome P-450) to inactive hydroxylated metabolites (predominant route) and by reductases to reduced metabolites (warfarin alcohols). The warfarin alcohols have minimal anticoagulant activity. The metabolites are principally excreted into the urine; and to a lesser extent into the bile. The metabolites of warfarin that have been identified include dehydrowarfarin, two diastereoisomer alcohols, 4'-, 6-, 7-, 8- and 10-hydroxywarfarin. The cytochrome P-450 isozymes involved in the metabolism of warfarin include 2C9, 2C19, 2C8, 2C18, 1A2, and 3A4. 2C9 is likely to be the principal form of human liver P-450 which modulates the *in vivo* anticoagulant activity of warfarin.

Excretion: The terminal half-life of warfarin after a single dose is approximately one week; however, the effective half-life ranges from 20 to 60 hours, with a mean of about 40 hours. The clearance of R-warfarin is generally half that of S-warfarin, thus as the volumes of distribution are similar, the half-life of R-warfarin is longer than that of S-warfarin. The half-life of R-warfarin ranges from 37 to 89 hours, while that of S-warfarin ranges from 21 to 43 hours. Studies with radiolabeled drug have demonstrated that up to 92% of the orally administered dose is recovered in urine. Very little warfarin is excreted unchanged in urine. Urinary excretion is in the form of metabolites.

Elderly: Patients 60 years or older appear to exhibit greater than expected prothrombin time (PT)/International Normalized Ratio (INR) response to the anticoagulant effects of warfarin. The cause of the increased sensitivity to the anticoagulant effects of warfarin in this age group is unknown. This increased anticoagulant effect from warfarin may be due to a combination of pharmacokinetic and pharmacodynamic factors. Racemic warfarin clearance may be unchanged or reduced with increasing age. Limited information suggests there is no difference in the clearance of S-warfarin in the elderly versus young subjects. However, there may be a slight decrease in the clearance of R-warfarin in the elderly as compared to the young. Therefore, as patient age increases, a lower dose of warfarin is usually required to produce a therapeutic level of anticoagulation.

Asians: Asian patients may require lower initiation and maintenance doses of warfarin. One non-controlled study conducted in 151 Chinese outpatients reported a mean daily warfarin requirement of 3.3 \pm 1.4 mg to achieve an INR of 2 to 2.5. These patients were stabilized on warfarin for various indications. Patient age was the most important determinant of warfarin requirement in Chinese patients with a progressively lower warfarin requirement with increasing age.

Renal Dysfunction: Renal clearance is considered to be a minor determinant of anticoagulant response to warfarin. No dosage adjustment is necessary for patients with renal failure.

Hepatic Dysfunction: Hepatic dysfunction can potentiate the response to warfarin through impaired synthesis of clotting factors and decreased metabolism of warfarin.

Clinical Trials

Atrial Fibrillation (AF): In five prospective randomized controlled clinical trials involving 3711 patients with nonrheumatic AF, warfarin significantly reduced the risk of systemic thromboembolism including stroke (See Table 1). The risk reduction ranged from 60% to 86% in all except one trial (CAFA: 45%) which stopped early due to published positive results from two of these trials. The incidence of major bleeding in these trials ranged from 0.6 to 2.7% (See Table 1). Meta-analysis findings of these studies revealed that the effects of warfarin in reducing thromboembolic events including stroke were similar at either moderately high INR (2.0-4.5) or low INR (1.4-3.0). There was a significant reduction in minor bleeds at the low INR. Similar data from clinical studies in valvular atrial fibrillation patients are not available.

TABLE 1: Clinical Studies of Warfarin in Non-Rheumatic AF Patients*

Study	N		Thromboembolism		% Major Bleeding			
	Warfarin-Treated Patients	Control Patients	PT Ratio	INR	% Risk Reduction	p-value	Warfarin-Treated Patients	Control Patients
AFASAK	335	336	1.5-2.0	2.8-4.2	60	0.027	0.6	0.8
SPAF	210	211	1.3-1.8	2.6-4.5	67	0.01	1.9	1.9
BAATAF	212	208	1.2-1.5	1.8-2.7	86	<0.05	0.9	0.5
CAFA	187	191	1.3-1.6	2.0-3.0	45	0.28	2.7	0.5
SPRUF	280	265	1.2-1.5	1.4-2.8	79	0.001	2.3	1.5

*All study results of warfarin vs. control are based on intention-to-treat analysis and include ischemic stroke and systemic thromboembolism, excluding hemorrhage and transient ischemic attacks.

Myocardial Infarction: WARIS (The Warfarin Re-Infarction Study) was a double-blind, randomized study of 1214 patients 2 to 4 weeks post-infarction treated with warfarin to a target INR of 2.8 to 4.8. [But note that a lower INR was achieved and increased bleeding was associated with INR's above 4.0; (see **DOSAGE AND ADMINISTRATION**)]. The primary endpoint was a combination of total mortality and recurrent infarction. A secondary endpoint of cerebrovascular events was assessed. Mean follow-up of the patients was 37 months. The results for each endpoint separately, including an analysis of vascular death, are provided in the following table:

TABLE 2

Event	Warfarin (N=607)	Placebo (N=607)	RR (95% CI)	% Risk Reduction (p-value)
Total Patient Years of Follow-up	2018	1944		
Total Mortality	84 (4.7/100 py)	123 (6.3/100 py)	0.75 (0.60, 0.97)	24 (p=0.030)
Vascular Death	82 (4.1/100 py)	105 (5.4/100 py)	0.76 (0.60, 1.02)	22 (p=0.000)
Recurrent MI	82 (4.1/100 py)	124 (6.4/100 py)	0.65 (0.51, 0.85)	34 (p=0.001)
Cerebrovascular Event	20 (1.0/100 py)	44 (2.3/100 py)	0.48 (0.28, 0.75)	54 (p=0.002)

RR=Relative risk; Risk reduction=(1 - RR); CI=Confidence interval;
MI=Myocardial infarction; py=patient years

Mechanical and Bioprosthetic Heart Valves: In a prospective, randomized, open label, positive-controlled study (Mok et al, 1985) in 254 patients, the thromboembolic-free interval was found to be significantly greater in patients with mechanical prosthetic heart valves treated with warfarin alone compared with dipyridamole-aspirin (p<0.005) and pentoxifylline-aspirin (p<0.05) treated patients. Rates of thromboembolic events in these groups were 2.2, 8.6, and 7.9/100 patient years, respectively. Major bleeding rates were 2.5, 0.0, and 0.9/100 patient years, respectively.

In a prospective, open label, clinical trial (Saour et al, 1990) comparing moderate (INR 2.65) vs. high intensity (INR 9.0) warfarin therapies in 258 patients with mechanical prosthetic heart valves, thromboembolism occurred with similar frequency in the two groups (4.0 and 3.7 events/100 patient years, respectively). Major bleeding was similar frequency in the two groups (4.0 and 3.7 events/100 patient years, respectively). Major bleeding was more common in the high intensity group (2.1 events/100 patient years) vs. 0.95 events/100 patient years in the moderate intensity group.

In a randomized trial (Turpie et al, 1988) in 210 patients comparing two intensities of warfarin therapy (INR 2.0- 2.25 vs. INR 2.5-4.0) for a three-month period following tissue heart valve replacement, thromboembolism occurred with similar frequency in the two groups (major embolic events 2.0% vs. 1.9%, respectively and minor embolic events 10.8% vs. 10.2%, respectively). Major bleeding complications were more frequent with the higher intensity (major hemorrhages 4.6%) vs. none in the lower intensity.

INDICATIONS AND USAGE

WARFARIN SODIUM SOLUTION is indicated for the prophylaxis and/or treatment of venous thrombosis and its extension, and pulmonary embolism.

WARFARIN SODIUM SOLUTION is indicated for the prophylaxis and/or treatment of the thromboembolic complications associated with atrial fibrillation and/or cardiac valve replacement.

WARFARIN SODIUM SOLUTION is indicated to reduce the risk of death, recurrent myocardial infarction, and thromboembolic events such as stroke or systemic embolization after myocardial infarction.

CONTRAINDICATIONS

Anticoagulation is contraindicated in any localized or general physical condition or personal circumstance in which the hazard of hemorrhage might be greater than the potential clinical benefits of anticoagulation, such as:

Pregnancy: WARFARIN SODIUM SOLUTION is contraindicated in women who are or may become pregnant because the drug passes through the placental barrier and may cause fatal hemorrhage to the fetus in utero. Furthermore, there have been reports of birth malformations in children born to mothers who have been treated with warfarin during pregnancy.

Embryopathy characterized by nasal hypoplasia with or without stippled epiphyses (chondrodysplasia punctata) has been reported in pregnant women exposed to warfarin during the first trimester. Central nervous

system abnormalities also have been reported, including dorsal midline dysplasia characterized by agenesis of the corpus callosum, Dandy-Walker malformation, and midline cerebellar atrophy. Ventral midline dysplasia, characterized by optic atrophy and eye abnormalities have been observed. Mental retardation, blindness, and other central nervous system abnormalities have been reported in association with second and third trimester exposure. Although rare, teratogenic reports following in utero exposure to warfarin include urinary tract anomalies such as single kidney, asplenia, anencephaly, spina bifida, cranial nerve palsy, hydrocephalus, cardiac defects and congenital heart disease, polydactyly, deformities of toes, diaphragmatic hernia, corneal leukoma, cleft palate, cleft lip, schizencephaly, and microcephaly.

Spontaneous abortion and stillbirth are known to occur and a higher risk of fetal mortality is associated with the use of warfarin. Low birth weight and growth retardation have also been reported.

Women of childbearing potential who are candidates for anticoagulant therapy should be carefully evaluated and the indications critically reviewed with the patient. If the patient becomes pregnant while taking this drug, she should be apprised of the potential risks to the fetus, and the possibility of termination of the pregnancy should be discussed in light of those risks.

Hemorrhagic tendencies or blood dyscrasias.

Recent or contemplated surgery of: (1) central nervous system; (2) eye; (3) traumatic surgery resulting in large open surfaces.

Bleeding tendencies associated with active ulceration or overt bleeding of: (1) gastrointestinal, genitourinary or respiratory tracts; (2) cerebrovascular hemorrhage; (3) aneurysms-cerebral, dissecting aorta; (4) pericarditis and pericardial effusions; (5) bacterial endocarditis.

Threatened abortion, eclampsia and preeclampsia.

Inadequate laboratory facilities.

Unsupervised patients with senility, alcoholism, or psychosis or other lack of patient cooperation.

Spinal puncture and other diagnostic or therapeutic procedures with potential for uncontrollable bleeding.

Miscellaneous: major regional, lumbar block anesthesia, malignant hypertension and known hypersensitivity to warfarin or to any other components of this product.

WARNINGS

The most serious risks associated with anticoagulant therapy with warfarin sodium are hemorrhage in any tissue or organ and, less frequently (<0.1%), necrosis and/or gangrene of skin and other tissues. The risk of hemorrhage is related to the level of intensity and the duration of anticoagulant therapy. Hemorrhage and necrosis have in some cases been reported to result in death or permanent disability. Necrosis appears to be associated with local thrombosis and usually appears within a few days of the start of anticoagulant therapy. In severe cases of necrosis, treatment through debridement or amputation of the affected tissue, limb, breast or penis has been reported. Careful diagnosis is required to determine whether necrosis is caused by an underlying disease. Warfarin therapy should be discontinued when warfarin is suspected to be the cause of developing necrosis and heparin therapy may be considered for anticoagulation. Although various treatments have been attempted, no treatment for necrosis has been considered uniformly effective. See below for information on predisposing conditions. These and other risks associated with anticoagulant therapy must be weighed against the risk of thrombosis or embolization in untreated cases.

It cannot be emphasized too strongly that treatment of each patient is a highly individualized matter. WARFARIN SODIUM SOLUTION, a narrow therapeutic range (index) drug, may be affected by factors such as other drugs and dietary Vitamin K. Dosage should be controlled by periodic determinations of PT/INR or other suitable coagulation tests. Determinations of whole blood clotting and bleeding times are not effective measures for control of therapy. Heparin prolongs the one-stage PT. When heparin and WARFARIN SODIUM SOLUTION are administered concomitantly, refer below to CONVERSION FROM HEPARIN THERAPY for recommendations.

Caution should be observed when WARFARIN SODIUM SOLUTION is administered in any situation or in the presence of any predisposing

condition where added risk of hemorrhage, necrosis, and/or gangrene is present.

Anticoagulation therapy with WARFARIN SODIUM SOLUTION may enhance the release of atheromatous plaque emboli, thereby increasing the risk of complications from systemic cholesterol microembolization, including the "purple toes syndrome." Discontinuation of WARFARIN SODIUM SOLUTION therapy is recommended when such phenomena are observed.

Systemic atheroemboli and cholesterol microemboli can present with a variety of signs and symptoms including purple toes syndrome, livedo reticularis, rash, gangrene, abrupt and intense pain in the leg, foot, or toes, foot ulcers, myalgia, penile gangrene, abdominal pain, flank or back pain, hematuria, renal insufficiency, hypertension, cerebral ischemia, spinal cord infarction, pancreatitis, symptoms simulating polyarteritis, or any other sequelae of vascular compromise due to embolic occlusion. The most commonly involved visceral organs are the kidneys followed by the pancreas, spleen, and liver. Some cases have progressed to necrosis or death.

Purple toes syndrome is a complication of oral anticoagulation characterized by a dark, purplish or mottled color of the toes, usually occurring between 3-10 weeks, or later, after the initiation of therapy with warfarin or related compounds. Major features of this syndrome include purple color of plantar surfaces and sides of the toes that blanches on moderate pressure and fades with elevation of the legs; pain and tenderness of the toes; waxing and waning of the color over time. While the purple toes syndrome is reported to be reversible, some cases progress to gangrene or necrosis which may require debridement of the affected area, or may lead to amputation.

Heparin-induced thrombocytopenia: WARFARIN SODIUM SOLUTION should be used with caution in patients with heparin-induced thrombocytopenia and deep venous thrombosis. Cases of venous limb ischemia, necrosis, and gangrene have occurred in patients with heparin-induced thrombocytopenia and deep venous thrombosis when heparin treatment was discontinued and warfarin therapy was started or continued. In some patients sequelae have included amputation of the involved area and/or death (Warkentin et al, 1997).

A severe elevation (>50 seconds) in activated partial thromboplastin time (aPTT) with a PT/INR in the desired range has been identified as an indication of increased risk of postoperative hemorrhage.

The decision to administer anticoagulants in the following conditions must be based upon clinical judgment in which the risks of anticoagulant therapy are weighed against the benefits:

Lactation: Based on very limited published data, warfarin has not been detected in the breast milk of mothers treated with warfarin. The same limited published data reports that some breast-fed infants, whose mothers were treated with warfarin, had prolonged prothrombin times, although not as prolonged as those of the mothers. The decision to breast-feed should be undertaken only after careful consideration of the available alternatives. Women who are breast-feeding and anticoagulated with warfarin should be very carefully monitored so that recommended PT/INR values are not exceeded. It is prudent to perform coagulation tests and to evaluate vitamin K status in infants at risk for bleeding tendencies before advising women taking warfarin to breast-feed. Effects in premature infants have not been evaluated.

Severe to moderate hepatic or renal insufficiency.

Infectious diseases or disturbances of intestinal flora: sprue, antibiotic therapy.

Trauma which may result in internal bleeding.

Surgery or trauma resulting in large exposed raw surfaces.

Indwelling catheters.

Severe to moderate hypertension.

Known or suspected deficiency in protein C mediated anticoagulant response: Hereditary or acquired deficiencies of protein C or its cofactor, protein S, have been associated with tissue necrosis following warfarin administration. Not all patients with these conditions develop necrosis, and tissue necrosis occurs in patients without these deficiencies. Inherited resistance to activated protein C has been described in many patients with

venous thromboembolic disorders but has not yet been evaluated as a risk factor for tissue necrosis. The risk associated with these conditions, both for recurrent thrombosis and for adverse reactions, is difficult to evaluate since it does not appear to be the same for everyone. Decisions about testing and therapy must be made on an individual basis. It has been reported that concomitant anticoagulation therapy with heparin for 5 to 7 days during initiation of therapy with WARFARIN SODIUM SOLUTION may minimize the incidence of tissue necrosis. Warfarin therapy should be discontinued when warfarin is suspected to be the cause of developing necrosis and heparin therapy may be considered for anticoagulation.

Miscellaneous: polycythemia vera, vasculitis, and severe diabetes.

Minor and severe allergic/hypersensitivity reactions and anaphylactic reactions have been reported.

In patients with acquired or inherited warfarin resistance, decreased therapeutic responses to WARFARIN SODIUM SOLUTION have been reported. Exaggerated therapeutic responses have been reported in other patients.

Patients with congestive heart failure may exhibit greater than expected PT/INR response to WARFARIN SODIUM SOLUTION, thereby requiring more frequent laboratory monitoring, and reduced doses of WARFARIN SODIUM SOLUTION.

Concomitant use of anticoagulants with streptokinase or urokinase is not recommended and may be hazardous. (Please note recommendations accompanying these preparations.)

PRECAUTIONS

Periodic determination of PT/INR or other suitable coagulation test is essential.

Numerous factors, alone or in combination, including travel, changes in diet, environment, physical state and medications, including botanicals, may influence response of the patient to anticoagulants. It is generally good practice to monitor the patient's response with additional PT/INR determinations in the period immediately after discharge from the hospital, and whenever other medications, including botanicals, are initiated, discontinued or taken irregularly. The following factors are listed for reference; however, other factors may also affect the anticoagulant response.

Drugs may interact with WARFARIN SODIUM SOLUTION through pharmacodynamic or pharmacokinetic mechanisms. Pharmacodynamic mechanisms for drug interactions with WARFARIN SODIUM SOLUTION are synergism (impaired hemostasis, reduced clotting factor synthesis), competitive antagonism (vitamin K), and altered physiologic control loop for vitamin K metabolism (hereditary resistance). Pharmacokinetic mechanisms for drug interactions with WARFARIN SODIUM SOLUTION are mainly enzyme induction, enzyme inhibition, and reduced plasma protein binding. It is important to note that some drugs may interact by more than one mechanism.

The following factors, alone or in combination, may be responsible for INCREASED PT/INR response:

ENDOGENOUS FACTORS:

blood dyscrasias — see CONTRAINDICATIONS cancer collagen vascular disease congestive heart failure	disturbances elevated temperature hepatic disorders infectious hepatitis jaundice	hyperlipidemia poor nutritional status starvation vitamin K deficiency
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EXOGENOUS FACTORS:

Potential drug interactions with WARFARIN SODIUM SOLUTION are listed below by drug class and by specific drugs.

Botanicals that contain coumarins with potential anticoagulant effects:		
African Angelica (Dong Quai) Aniseed Anise Ash Foxtail Bayberry ¹ Bilbo Buchu Caperwort ¹ Cassia ²	Celery Chamomile (German and Roman) Dandelion ² Fenugreek Horse Chestnut Horseradish Licorice ² Meadowweet ¹ Rutia	Parley Parsnip Flower Prickly Ash (Northern) Quassin Red Clover Sungel Clover Sweet Woodruff Tea Tree Wild Carrot Wild Lettuce

Miscellaneous botanicals with anticoagulant properties:		
Bladder Wrack (Fucus)	Pau d'arco	

Botanicals that contain salicylate and/or have antiplatelet properties:		
Agrimony ⁴ Aloe Gel Aspen Black Cohosh Black Honeysuckle Sagebrush ⁴ Cassia ² Clove	Dandelion ² Feverfew Garlic ⁴ German Sarsaparilla Ginger Ginkgo Biloba Ginseng (Panax) ⁵ Licorice ²	Meadowweet ¹ Onion ⁴ Policosanol Poplar Sawyer Turmeric Willow Wintergreen

Botanicals with fibrinolytic properties:		
Bromelain Capsicum ³	Garlic ⁴ Ginseng (Panax) ⁵	Inchew Nicotiana Onion ⁴

Botanicals with coagulant properties:		
Agrimony ⁴ Goatshead	Mistletoe Yarrow	

¹ Contains coumarins and salicylate.

² Contains coumarins and has fibrinolytic properties.

³ Contains coumarins and has antiplatelet properties.

⁴ Contains salicylate and has coagulant properties.

⁵ Has antiplatelet and fibrinolytic properties.

Effect on Other Drugs: Coumarins may also affect the action of other drugs. Hypoglycemic agents (chlorpropamide and tolbutamide) and anticonvulsants (phenytoin and phenobarbital) may accumulate in the body as a result of interference with either their metabolism or excretion.

Special Risk Patients: WARFARIN SODIUM SOLUTION is a narrow therapeutic range (index) drug, and caution should be observed when warfarin sodium is administered to certain patients such as the elderly or debilitated or when administered in any situation or physical condition where added risk of hemorrhage is present.

Intramuscular (I.M.) injections of concomitant medications should be confined to the upper extremities which permits easy access for manual compression, inspections for bleeding and use of pressure bandages.

Caution should be observed when WARFARIN SODIUM SOLUTION is administered concomitantly with nonsteroidal anti-inflammatory drugs (NSAIDs), including aspirin, to be certain that no change in anticoagulation dosage is required. In addition to specific drug interactions that might affect PT/INR, NSAIDs, including aspirin, can inhibit platelet aggregation, and can cause gastrointestinal bleeding, peptic ulceration and/or perforation. Acquired or inherited warfarin resistance should be suspected if large daily doses of WARFARIN SODIUM SOLUTION are required to maintain a patient's PT/INR within a normal therapeutic range.

Information for Patients: The objective of anticoagulant therapy is to decrease the clotting ability of the blood so that thrombosis is prevented, while avoiding spontaneous bleeding. Effective therapeutic levels with minimal complications are in part dependent upon cooperative and well-instructed patients who communicate effectively with their physician. Patients should be advised: Strict adherence to prescribed dosage schedule is necessary. Do not take or discontinue any other medication, including salicylates (e.g., aspirin and topical analgesics), other over-the-counter medications, and botanical (herbal) products (e.g., bromelains, coenzyme Q10, danshen, dong quai, garlic, Ginkgo biloba, ginseng, and St. John's wort) except on advice of the physician. Avoid alcohol consumption. Do not take WARFARIN SODIUM SOLUTION during pregnancy and do not become pregnant while taking it (see **CONTRAINDICATIONS**). Avoid any activity or sport that may result in traumatic injury. Prothrombin time tests and regular visits to physician or clinic are needed to monitor therapy. Carry identification stating that WARFARIN SODIUM SOLUTION is being taken. If the prescribed dose of WARFARIN SODIUM SOLUTION is forgotten, notify the physician immediately. Take the dose as soon as possible on the same day but do

not take a double dose of WARFARIN SODIUM SOLUTION the next day to make up for missed doses. The amount of vitamin K in food may affect therapy with WARFARIN SODIUM SOLUTION. Eat a normal, balanced diet maintaining a consistent amount of vitamin K. Avoid drastic changes in dietary habits, such as eating large amounts of green leafy vegetables. You should also avoid intake of cranberry juice or any other cranberry products. Notify your health care provider if any of these products are part of your normal diet. Contact physician to report any illness, such as diarrhea, infection or fever. Notify physician immediately if any unusual bleeding or symptoms occur. Signs and symptoms of bleeding include: pain, swelling or discomfort, prolonged bleeding from cuts, increased menstrual flow or vaginal bleeding, nosebleeds, bleeding of gums from brushing, unusual bleeding or bruising, red or dark brown urine, red or tar black stools, headache, dizziness, or weakness. If therapy with WARFARIN SODIUM SOLUTION is discontinued, patients should be cautioned that the anticoagulant effects of WARFARIN SODIUM SOLUTION may persist for about 2 to 5 days. **Patients should be informed that all warfarin sodium, USP, products represent the same medication, and should not be taken concomitantly, as overdosage may result.**

Carcinogenesis, Mutagenesis, Impairment of Fertility: Carcinogenicity and mutagenicity studies have not been performed with WARFARIN SODIUM SOLUTION. The reproductive effects of WARFARIN SODIUM SOLUTION have not been evaluated.

Use in Pregnancy: Pregnancy Category X - See **CONTRAINDICATIONS**.

Pediatric Use: Safety and effectiveness in pediatric patients below the age of 18 have not been established, in randomized, controlled clinical trials. However, the use of WARFARIN SODIUM SOLUTION in pediatric patients is well-documented for the prevention and treatment of thromboembolic events. Difficulty achieving and maintaining therapeutic PT/INR ranges in the pediatric patient has been reported. More frequent PT/INR determinations are recommended because of possible changing warfarin requirements.

Geriatric Use: Patients 60 years or older appear to exhibit greater than expected PT/INR response to the anticoagulant effects of warfarin (see **CLINICAL PHARMACOLOGY**). WARFARIN SODIUM SOLUTION is contraindicated in any unsupervised patient with senility. Caution should be observed with administration of warfarin sodium to elderly patients in any situation or physical condition where added risk of hemorrhage is present. Lower initiation and maintenance doses of WARFARIN SODIUM SOLUTION are recommended for elderly patients (see **DOSAGE AND ADMINISTRATION**).

ADVERSE REACTIONS

Potential adverse reactions to WARFARIN SODIUM SOLUTION may include:

- Fatal or nonfatal hemorrhage from any tissue or organ. This is a consequence of the anticoagulant effect. The signs, symptoms, and severity will vary according to the location and degree or extent of the bleeding. Hemorrhagic complications may present as paralysis; paresthesia; headache, chest, abdomen, joint, muscle or other pain; dizziness; shortness of breath, difficult breathing or swallowing; unexplained swelling; weakness; hypotension; or unexplained shock. Therefore, the possibility of hemorrhage should be considered in evaluating the condition of any anticoagulated patient with complaints which do not indicate an obvious diagnosis. Bleeding during anticoagulant therapy does not always correlate with PT/INR. (See **OVERDOSAGE: Treatment**.)

- Bleeding which occurs when the PT/INR is within the therapeutic range warrants diagnostic investigation since it may unmask a previously unsuspected lesion, e.g., tumor, ulcer, etc.

- Necrosis of skin and other tissues. (See **WARNINGS**.)

- Adverse reactions reported infrequently include: hypersensitivity/allergic reactions, systemic cholesterol microembolization, purple toes syndrome, hepatitis, cholestatic hepatic injury, jaundice, elevated liver enzymes, vasculitis, edema, fever, rash, dermatitis, including bullous eruptions, urticaria, abdominal pain including cramping, flatulence/bloating, fatigue, lethargy, malaise, asthenia, nausea, vomiting, diarrhea, pain, headache, dizziness, taste perversion, pruritus, alopecia, cold intolerance, and paresthesia including feeling cold and chills.

Rare events of tracheal or tracheobronchial calcification have been reported in association with long-term warfarin therapy. The clinical significance of this event is unknown. Priapism has been associated with anticoagulant administration, however, a causal relationship has not been established.

OVERDOSAGE

Signs and Symptoms: Suspected or overt abnormal bleeding (e.g., appearance of blood in stools or urine, hematuria, excessive menstrual bleeding, melena, petechiae, excessive bruising or persistent oozing from superficial injuries) are early manifestations of anticoagulation beyond a safe and satisfactory level.

Treatment: Excessive anticoagulation, with or without bleeding, may be controlled by discontinuing WARFARIN SODIUM SOLUTION therapy and if necessary, by administration of oral or parenteral vitamin K1. (Please see recommendations accompanying vitamin K1 preparations prior to use.)

Such use of vitamin K1 reduces response to subsequent WARFARIN SODIUM SOLUTION therapy. Patients may return to a pretreatment thrombotic status following the rapid reversal of a prolonged PT/INR. Resumption of WARFARIN SODIUM SOLUTION administration reverses the effect of vitamin K, and a therapeutic PT/INR can again be obtained by careful dosage adjustment. If rapid anticoagulation is indicated, heparin may be preferable for initial therapy.

If minor bleeding progresses to major bleeding, give 5 to 25 mg (rarely up to 50 mg) parenteral vitamin K1. In emergency situations of severe hemorrhage, clotting factors can be returned to normal by administering 200 to 500 mL of fresh whole blood or fresh frozen plasma, or by giving commercial Factor IX complex.

A risk of hepatitis and other viral diseases is associated with the use of these blood products; Factor IX complex is also associated with an increased risk of thrombosis. Therefore, these preparations should be used only in exceptional or life-threatening bleeding episodes secondary to WARFARIN SODIUM SOLUTION overdosage.

Purified Factor IX preparations should not be used because they cannot increase the levels of prothrombin, Factor VII and Factor X which are also depressed along with the levels of Factor IX as a result of WARFARIN SODIUM SOLUTION treatment. Packed red blood cells may also be given if significant blood loss has occurred. Infusions of blood or plasma should be monitored carefully to avoid precipitating pulmonary edema in elderly patients or patients with heart disease.

DOSAGE AND ADMINISTRATION

The dosage and administration of WARFARIN SODIUM SOLUTION must be individualized for each patient according to the particular patient's PT/INR response to the drug. The dosage should be adjusted based upon the patient's PT/INR. (See **LABORATORY CONTROL** below for full discussion on INR.)

Venous Thromboembolism (including pulmonary embolism): Available clinical evidence indicates that an INR of 2.0-3.0 is sufficient for prophylaxis and treatment of venous thromboembolism and minimizes the risk of hemorrhage associated with higher INRs. In patients with risk factors for recurrent venous thromboembolism including venous insufficiency, inherited thrombophilia, idiopathic venous thromboembolism, and a history of thrombotic events, consideration should be given to longer term therapy (Schulman et al, 1995 and Schulman et al, 1997).

Atrial Fibrillation: Five recent clinical trials evaluated the effects of warfarin in patients with non-valvular atrial fibrillation (AF). Meta-analysis findings of these studies revealed that the effects of warfarin in reducing thromboembolic events including stroke were similar at either moderately high INR (2.0-4.5) or low INR (1.4-3.0). There was a significant reduction in minor bleeds at the low INR. Similar data from clinical studies in valvular atrial fibrillation patients are not available. The trials in non-valvular atrial fibrillation support the American College of Chest Physicians' (ACCP) recommendation that an INR of 2.0-3.0 be used for long term warfarin therapy in appropriate AF patients.

Post-Myocardial Infarction: In post-myocardial infarction patients, WARFARIN SODIUM SOLUTION therapy should be initiated early (2-4 weeks post-infarction) and dosage should be adjusted to maintain an INR of 2.5-3.5 long-term. The recommendation is based on the results of the WARIS study in which treatment was initiated 2 to 4 weeks after the infarction. In patients thought to be at an increased risk of bleeding complications or on aspirin therapy, maintenance of WARFARIN SODIUM SOLUTION therapy at the lower end of this INR range is recommended.

Mechanical and Bioprosthetic Heart Valves: In patients with mechanical heart valve(s), long term prophylaxis with warfarin to an INR of 2.5-3.5 is recommended. In patients with bioprosthetic heart valve(s), based on limited data, the American College of Chest Physicians recommends warfarin therapy to an INR of 2.0-3.0 for 12 weeks after valve insertion. In

patients with additional risk factors such as atrial fibrillation or prior thromboembolism, consideration should be given for longer term therapy.

Recurrent Systemic Embolism: In cases where the risk of thromboembolism is great, such as in patients with recurrent systemic embolism, a higher INR may be required.

An INR of greater than 4.0 appears to provide no additional therapeutic benefit in most patients and is associated with a higher risk of bleeding.

Initial Dosage: The dosing of WARFARIN SODIUM SOLUTION must be individualized according to patient's sensitivity to the drug as indicated by the PT/INR. Use of a large loading dose may increase the incidence of hemorrhagic and other complications, does not offer more rapid protection against thrombi formation, and is not recommended. Lower initiation and maintenance doses are recommended for elderly and/or debilitated patients and patients with potential to exhibit greater than expected PT/INR response to WARFARIN SODIUM SOLUTION (see **PRECAUTIONS**). Based on limited data, Asian patients may also require lower initiation and maintenance doses of WARFARIN SODIUM SOLUTION (see **CLINICAL PHARMACOLOGY**). It is recommended that WARFARIN SODIUM SOLUTION therapy be initiated with a dose of 2 to 5 mg per day with dosage adjustments based on the results of PT/INR determinations.

Maintenance: Most patients are satisfactorily maintained at a dose of 2 to 10 mg daily. Flexibility of dosage is provided by breaking scored tablets in half. The individual dose and interval should be gauged by the patient's prothrombin response.

Duration of Therapy: The duration of therapy in each patient should be individualized. In general, anticoagulant therapy should be continued until the danger of thrombosis and embolism has passed.

Missed Dose: The anticoagulant effect of WARFARIN SODIUM SOLUTION persists beyond 24 hours. If the patient forgets to take the prescribed dose of WARFARIN SODIUM SOLUTION at the scheduled time, the dose should be taken as soon as possible on the same day. The patient should not take the missed dose by doubling the daily dose to make up for missed doses, but should refer back to his or her physician.

LABORATORY CONTROL The PT reflects the depression of vitamin K dependent Factors VII, X and II. There are several modifications of the one-stage PT and the physician should become familiar with the specific method used in his laboratory. The degree of anticoagulation indicated by any range of PTs may be altered by the type of thromboplastin used; the appropriate therapeutic range must be based on the experience of each laboratory. The PT should be determined daily after the administration of the initial dose until PT/INR results stabilize in the therapeutic range. Intervals between subsequent PT/INR determinations should be based upon the physician's judgment of the patient's reliability and response to WARFARIN SODIUM SOLUTION in order to maintain the individual within the therapeutic range. Acceptable intervals for PT/INR determinations are normally within the range of one to four weeks after a stable dosage has been determined. To ensure adequate control, it is recommended that additional PT tests are done when other warfarin products are interchanged with warfarin sodium tablets, USP, as well as whenever other medications are initiated, discontinued, or taken irregularly (see **PRECAUTIONS**).

Different thromboplastin reagents vary substantially in their sensitivity to sodium warfarin-induced effects on PT. To define the appropriate therapeutic regimen it is important to be familiar with the sensitivity of the thromboplastin reagent used in the laboratory and its relationship to the International Reference Preparation (IRP), a sensitive thromboplastin reagent prepared from human brain.

A system of standardizing the PT in oral anticoagulant control was introduced by the World Health Organization in 1983. It is based upon the determination of an International Normalized Ratio (INR) which provides a common basis for communication of PT results and interpretations of therapeutic ranges. The INR system of reporting is based on a logarithmic relationship between the PT ratios of the test and reference preparation. The INR is the PT ratio that would be obtained if the International Reference Preparation (IRP), which has an ISI of 1.0, was used to perform the test. Early clinical studies of oral anticoagulants, which formed the basis for recommended therapeutic ranges of 1.5 to 2.5 times control mean normal PT, used sensitive human brain thromboplastin. When using the less sensitive rabbit brain thromboplastins commonly employed in PT assays today, adjustments must be made to the targeted PT range that reflect this decrease in sensitivity.

The INR can be calculated as: $INR = (\text{observed PT ratio})^{ISI}$ where the ISI (International Sensitivity Index) is the correction factor in the equation that relates the PT ratio of the local reagent to the reference preparation and is a measure of the sensitivity of a given thromboplastin to reduction of vitamin K-dependent coagulation factors; the lower the ISI, the more "sensitive" the reagent and the closer the derived INR will be to the observed PT ratio.

The proceedings and recommendations of the 1992 National Conference on Antithrombotic Therapy^{2,4} review and evaluate issues related to oral anticoagulant therapy and the sensitivity of thromboplastin reagents and provide additional guidelines for defining the appropriate therapeutic regimen.

The conversion of the INR to PT ratios for the less-intense (INR 2.0-3.0) and more intense (INR 2.5-3.5) therapeutic range recommended by the ACCP for thromboplastins over a range of ISI values is shown in Table 3.⁵

TABLE 3: Relationship Between INR and PT Ratios For Thromboplastins With Different ISI Values (Sensitivities)

	PT RATIOS				
	ISI 1.0	ISI 1.4	ISI 1.8	ISI 2.3	ISI 2.8
INR=2.0-3.0	2.0-3.0	1.8-2.2	1.5-1.8	1.4-1.8	1.3-1.5
INR=2.5-3.5	2.5-3.5	1.9-2.4	1.7-2.0	1.5-1.7	1.4-1.6

TREATMENT DURING DENTISTRY AND SURGERY The management of patients who undergo dental and surgical procedures requires close liaison between attending physicians, surgeons and dentists. PT/INR determination is recommended just prior to any dental or surgical procedure. In patients undergoing minimal invasive procedures who must be anticoagulated prior to, during, or immediately following these procedures, adjusting the dosage of WARFARIN SODIUM SOLUTION to maintain the PT/INR at the low end of the therapeutic range may safely allow for continued anticoagulation. The operative site should be sufficiently limited and accessible to permit the effective use of local procedures for hemostasis. Under these conditions, dental and minor surgical procedures may be performed without undue risk of hemorrhage. Some dental or surgical procedures may necessitate the interruption of WARFARIN SODIUM SOLUTION therapy. When discontinuing WARFARIN SODIUM SOLUTION even for a short period of time, the benefits and risks should be strongly considered.

CONVERSION FROM HEPARIN THERAPY Since the anticoagulant effect of WARFARIN SODIUM SOLUTION is delayed, heparin is preferred initially for rapid anticoagulation. Conversion to WARFARIN SODIUM SOLUTION may begin concomitantly with heparin therapy or may be delayed 3 to 6 days. To ensure continuous anticoagulation, it is advisable to continue full dose heparin therapy and that WARFARIN SODIUM SOLUTION therapy be overlapped with heparin for 4 to 5 days, until WARFARIN SODIUM SOLUTION has produced the desired therapeutic response as determined by PT/INR. When WARFARIN SODIUM SOLUTION has produced the desired PT/INR or prothrombin activity, heparin may be discontinued.

WARFARIN SODIUM SOLUTION may increase the aPTT test, even in the absence of heparin. During initial therapy with WARFARIN SODIUM SOLUTION, the interference with heparin anticoagulation is of minimal clinical significance.

As heparin may affect the PT/INR, patients receiving both heparin and WARFARIN SODIUM SOLUTION should have blood for PT/INR determination drawn at least:

- 5 hours after the last IV bolus dose of heparin, or
- 4 hours after cessation of a continuous IV infusion of heparin, or
- 24 hours after the last subcutaneous heparin injection.

HOW SUPPLIED

Solution of warfarin sodium for oral use. Each mL contains one mg of warfarin sodium. WARFARIN SODIUM SOLUTION is available in two package sizes: 60 mL and 180 mL.

Protect from light. Store at controlled room temperature (59°-86°F, 15°-30°C). Dispense in a tight, light-resistant container as defined in the USP.

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ATTACHMENT-3
Approved Drug Products with Therapeutic Equivalence Evaluations
24th Edition (electronic)

Active Ingredient Search Results from "OB_Rx" table for query on "warfarin sodium."

Appl No	TE Code	RLD	Active Ingredient	Dosage Form; Route	Strength	Proprietary Name	Applicant
<u>009218</u>		Yes	WARFARIN SODIUM	INJECTABLE; INJECTION	5MG/VIAL	COUMADIN	BRISTOL MYERS SQUIBB
<u>040145</u>	AB	No	WARFARIN SODIUM	TABLET; ORAL	10MG	WARFARIN SODIUM	BARR
<u>040145</u>	AB	No	WARFARIN SODIUM	TABLET; ORAL	1MG	WARFARIN SODIUM	BARR
<u>040145</u>	AB	No	WARFARIN SODIUM	TABLET; ORAL	2.5MG	WARFARIN SODIUM	BARR
<u>040145</u>	AB	No	WARFARIN SODIUM	TABLET; ORAL	2MG	WARFARIN SODIUM	BARR
<u>040145</u>	AB	No	WARFARIN SODIUM	TABLET; ORAL	3MG	WARFARIN SODIUM	BARR
<u>040145</u>	AB	No	WARFARIN SODIUM	TABLET; ORAL	4MG	WARFARIN SODIUM	BARR
<u>040145</u>	AB	No	WARFARIN SODIUM	TABLET; ORAL	5MG	WARFARIN SODIUM	BARR
<u>040145</u>	AB	No	WARFARIN SODIUM	TABLET; ORAL	6MG	WARFARIN SODIUM	BARR
<u>040145</u>	AB	No	WARFARIN SODIUM	TABLET; ORAL	7.5MG	WARFARIN SODIUM	BARR
<u>009218</u>	AB	Yes	WARFARIN SODIUM	TABLET; ORAL	10MG	COUMADIN	BRISTOL MYERS SQUIBB
<u>009218</u>	AB	No	WARFARIN SODIUM	TABLET; ORAL	1MG	COUMADIN	BRISTOL MYERS SQUIBB
<u>009218</u>	AB	No	WARFARIN SODIUM	TABLET; ORAL	2.5MG	COUMADIN	BRISTOL MYERS SQUIBB
<u>009218</u>	AB	No	WARFARIN SODIUM	TABLET; ORAL	2MG	COUMADIN	BRISTOL MYERS SQUIBB

<u>009218</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	3MG	COUMADIN	BRISTOL MYERS SQUIBB
<u>009218</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	4MG	COUMADIN	BRISTOL MYERS SQUIBB
<u>009218</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	5MG	COUMADIN	BRISTOL MYERS SQUIBB
<u>009218</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	6MG	COUMADIN	BRISTOL MYERS SQUIBB
<u>009218</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	7.5MG	COUMADIN	BRISTOL MYERS SQUIBB
<u>040415</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	10MG	WARFARIN SODIUM	GENPHARM
<u>040415</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	1MG	WARFARIN SODIUM	GENPHARM
<u>040415</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	2.5MG	WARFARIN SODIUM	GENPHARM
<u>040415</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	2MG	WARFARIN SODIUM	GENPHARM
<u>040415</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	3MG	WARFARIN SODIUM	GENPHARM
<u>040415</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	4MG	WARFARIN SODIUM	GENPHARM
<u>040415</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	5MG	WARFARIN SODIUM	GENPHARM
<u>040415</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	6MG	WARFARIN SODIUM	GENPHARM
<u>040415</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	7.5MG	WARFARIN SODIUM	GENPHARM
<u>040196</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	10MG	WARFARIN SODIUM	SANDOZ

<u>040196</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	1MG	WARFARIN SODIUM	SANDOZ
<u>040196</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	2.5MG	WARFARIN SODIUM	SANDOZ
<u>040196</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	2MG	WARFARIN SODIUM	SANDOZ
<u>040196</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	3MG	WARFARIN SODIUM	SANDOZ
<u>040196</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	4MG	WARFARIN SODIUM	SANDOZ
<u>040196</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	5MG	WARFARIN SODIUM	SANDOZ
<u>040196</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	6MG	WARFARIN SODIUM	SANDOZ
<u>040196</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	7.5MG	WARFARIN SODIUM	SANDOZ
<u>040301</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	10MG	WARFARIN SODIUM	TARO
<u>040301</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	1MG	WARFARIN SODIUM	TARO
<u>040301</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	2.5MG	WARFARIN SODIUM	TARO
<u>040301</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	2MG	WARFARIN SODIUM	TARO
<u>040301</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	3MG	WARFARIN SODIUM	TARO
<u>040301</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	4MG	WARFARIN SODIUM	TARO
<u>040301</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	5MG	WARFARIN SODIUM	TARO

<u>040301</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	6MG	WARFARIN SODIUM	TARO
<u>040301</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	7.5MG	WARFARIN SODIUM	TARO
<u>040416</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	10MG	JANTOVEN	USL PHARMA
<u>040416</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	1MG	JANTOVEN	USL PHARMA
<u>040416</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	2.5MG	JANTOVEN	USL PHARMA
<u>040416</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	2MG	JANTOVEN	USL PHARMA
<u>040416</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	3MG	JANTOVEN	USL PHARMA
<u>040416</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	4MG	JANTOVEN	USL PHARMA
<u>040416</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	5MG	JANTOVEN	USL PHARMA
<u>040416</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	6MG	JANTOVEN	USL PHARMA
<u>040416</u> AB	No	WARFARIN SODIUM	TABLET; ORAL	7.5MG	JANTOVEN	USL PHARMA

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