

*Food and Drug Administration
Center for Biologics Evaluation and Research
Office of Compliance and Biologics Quality
Division of Case Management
Advertising and Promotional Labeling Branch*

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To: Rana Pratibha, OBRR/DBA/RPMB, HFM-380
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From: Lisa Stockbridge, Ph.D., CSO, OCBQ/DCM/APLB/HFM-602

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Through: Robert A. Sausville, Director, Director, OCBQ/DCM/HFM-610

Subject: Review of proposed proprietary name **Hizentra**
Immune Globulin Subcutaneous (Human), 20% Liquid
BLA 125350

Executive Summary:

APLB recommends that the proposed proprietary name **Hizentra** be found **Acceptable** at this time.

Background:

On April 29, 2008, CSL Behring (CSL) submitted a proprietary name proposal for **Vivaglobin 20%** to BB-IND -(b)(4)- for the immune globulin subcutaneous (human) identified by the internal product code IgPro20. CSL asked to maintain the trade name, **Vivaglobin**, with the addition of the modifier “**20%**” because it is already established in the marketplace and readily identified by the target population. However, the proposed name was rejected because of the potential for confusion between the two products **Vivaglobin** and **Vivaglobin 20%** as well as confusion with product names that sound and look alike (**Venoglobulin-S**, **Thyroglobulin**, **Vivactil**, **Vivarin**).

Following the rejection of the name Vivaglobin 20%, CSL proposed **Hizentra** (pronounced Hye -zen’ -tra). The proposal was submitted with BLA 125350 on April 30, 2009, and included the results of a study conducted by the -----(b)(4)-----
----- conducted a Proprietary Name Analysis and a Proprietary Name Promotional Assessment for **Hizentra** and concluded that, when **Hizentra** is compared to other product names, three names were potentially similar (**Hyzaar**, **Isentress**, and **Selzentry**) and no names were considered to be an issue for the prescribing/dispensing of **Hizentra**. The Proprietary Name Promotional Assessment indicated that **Hizentra** is not promotional or misleading.

Overview of the Proposed Indication, Dose, Dosage Form, Administration, and Storage

Information:

As with **Vivaglobin**, the proposed indication for **Hizentra** is for the treatment of patients with primary immunodeficiency.

Proposed Proprietary Name Evaluation**1) False or Misleading:**

The proposed proprietary name **Hizentra** is not regarded to be false or misleading.

The first syllable, “Hi-” may be perceived as an expression of a higher concentration than CSL’s currently available 16% and 10% solutions (**Vivaglobin** and **Privigen**). There are other products that are 20% solutions.

2) Fanciful [21CFR 201.10 (c)(3)]:

The proposed proprietary name **Hizentra** is not regarded as fanciful.

3) Similarity in Spelling or Pronunciation [21 CFR 201.10 (c) (5)]:

Since drug products are prescribed through written, verbal, and/or electronic orders, such forms of communication may lead to medication errors, particularly if proprietary and /or established names sound or look alike. Even when proprietary names are only slightly similar, overlapping product characteristics may create a greater potential for confusion. **Hizentra** may be confused with the proprietary name or established name of several different drugs because of similarity in spelling or pronunciation: **Herceptin**, **Hazaar**, **Hytrin**, **Hydrea**, **Isentress**, and **Selzentry**.

| Name | Dosage Form | Rx or OTC | Dose & Administration | Indication | Storage | Potential |
|---|---|------------------|--|--|----------------------------------|------------------|
| Hizentra Immune Globulin Subcutaneous (Human) | Supplied as a 20% IgG solution for subcutaneous injection in 5, 10, 15, and 20 ml vials | Rx | Weekly subcutaneous administration to reach a cumulative monthly dose of 2-4 ml/kg | Treatment of adult/ pediatric primary immunodeficiency | Refrigerate at 2-8°C (35-46° F). | N/A |
| Herceptin (trastuzumab) Kit for Intravenous Use | Supplied as powder in 440 mg vial (kit includes 20 mL sterile water for | Rx | Weekly intravenous administration 2-4 mg/kg dose | Treatment of HER2 over expressing breast cancer | Refrigerate at 2-8°C (35-46° F). | Moderate |

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| | injection) | | | | | |
| Hyzaar (losartan/hydrochlorothiazide) | Oral Tablets 100 mg/25 mg; 50 mg/12.5 mg; 100 mg/12.5 mg | Rx | 1 tablet taken once daily | Hypertension | Room temperature | Low |
| Hytrin (terazosin HCl) | Oral tablets or capsules 1,2,5,10 and mg | Rx | 1-20 mg/day | Treatment of hypertension or benign prostatic hyperplasia | Room temperature Protect from light | Low |
| Hydrea (hydroxyurea) | Oral capsules 200, 200, 400, and 500 mg | Rx | 80 mg/kg every 3 rd day or 20-30 mg/kg daily Variable regimens for melanoma. | Treatment of melanoma, resistant chronic myelocytic leukemia and recurrent, metastatic or inoperable carcinoma of the ovary. Used concomitantly with irradiation therapy for local control of primary squamous cell carcinoma of the head and neck. | Room temperature Special storage and handling necessary to minimize the risk of dermal exposure in clinical, pharmacy, storeroom, and healthcare settings. | Low |
| Isentress (raltegravir) | Oral Tablets 400 mg | Rx | 800 mg/day | Treatment of HIV-1 infection in combination with other antiretroviral agents | Room temperature | Low |
| Selzentry (maraviroc) | Oral Tablets 150 mg and 300 mg | Rx | 300-1200 mg/day | In combination with other antiretroviral agents, indicated for treatment of CCR5-tropic HIV-1 infection in patients who have evidence of viral replication and HIV-1 | Room temperature | Low |

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| | | | | strains resistant to multiple antiretroviral agents | | |
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Strength/Dose/Dosage Form/Route of Administration

Different products with similar or identical strengths that have proprietary names that sound or look alike may be more easily confused than products with very different strengths. The risk of confusion increases if two products with similar proprietary names have identical strengths and dosing intervals. Thus, there is some risk of confusion between **Hizentra** and **Herceptin** because they have similar dosage and administration. However, this is mitigated by the fact that **Herceptin** is supplied as a kit for intravenous use with two vials: one containing powder and the other containing sterile water for injection, whereas **Hizentra** is supplied as a protein solution for subcutaneous injection.

The other sound or look alike proprietary names are supplied as oral tablets and/or capsules. Thus, there is a low risk of medical error with **Hazaar, Hytrin, Hydrea, Isentress, and Selzentry**.

Marketing Status

Products with similar proprietary names that are in the same marketing arena (e.g., prescription drug products) may more easily be confused than products with similar names in different markets. All of the potentially similar proprietary names are prescription products.

Indications and/or Pharmacological-Therapeutic Categories

Drug products with different indications and/or usage will not decrease the risk of confusion because of similar proprietary names, since the intended use or indication is not routinely communicated on a prescription. Nevertheless, none of the potentially confusing proprietary names have similar indication or therapeutic categories with **Hizentra**.

Products for advanced HIV disease (**Isentress** and **Selzentry**) or for cancer treatment (**Herceptin** and **Hydrea**) are often only available in specialized formularies for hospitals or treatment centers. Such specialization would minimize the potential for these products to be confused with **Hizentra**. It is unlikely that these products would be available in places that routinely prescribe maintenance drugs like **Hyzaar** and **Hytrin**.

Storage Location

The use of a different storage location (i.e., refrigerator vs. room temperature, oral dosage form location vs. intravenous dosage form location) for different products with similar names does not necessarily decrease the risk of wrong product selection by a health care professional. Therefore, the use of different storage locations for drugs with names that look or sound alike may not mitigate the potential risk of medication errors. Nevertheless, **Hizentra** and **Herceptin** are both refrigerated products, whereas the other products are stored at room temperature.

As stated above, **Isentress**, **Selzentry**, **Hydrea** and **Herceptin** are likely to have limited distribution or requirements for special handling. Thus, the storage location may mitigate the potential risk of medical error. **Hizentra**, like **Vivaglobin**, may be available for home use. It is unclear how this would affect its storage location.

Recommendations for proposed names

APLB recommends that the proposed proprietary name **Hizentra** be found acceptable at this time. Please note that this is a tentative acceptance that is subject to a re-evaluation 90 days prior to product approval.

If OBRR accepts our recommendation, please include the following text in your letter to the manufacturer:

We have considered your proposed proprietary name, **Hizentra**, in consultation with CBER's Advertising and Promotional Labeling Branch (APLB) and conclude that under 21 CFR Part 201 the proposed proprietary name is tentatively acceptable at this time.

Since a significant amount of time may pass between now and licensure of your product, a re-evaluation of the proprietary name, **Hizentra**, will be performed closer to the time of approval to ensure that FDA has not approved a product with a conflicting proprietary name in the interim.

If you have any questions regarding this review please contact Lisa Stockbridge at 301-827-6226.

The following references were used:

1. <http://dailymed.nlm.nih.gov> (accessed June 1, 2009)
2. <http://www.thomsonhc.com/pdrel/librarian> (accessed June 1, 2009)
3. <http://www.factsandcomparisons.com> (accessed June 1, 2009)
4. <http://www.accessdata.fda.gov/scripts/cder/drugsatfda/index.cfm> (CDER approved drug products through June 1, 2009)
5. <http://www.fda.gov/cber/products/htm> (CBER New BLA, 510 (k) Devices, NDA and PMA approvals lists through June 1, 2009)

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| Application #(s): | BLA 125350 |
| Firm Name | CSL Behring |
| Document Type: | PNR |
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| PNR Meeting: | 06/09/09 |
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Signature Block

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