

Instructions for Use (IFU) Content and Format Draft Guidance for Industry

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Disclaimer

- The views and opinions expressed in this presentation represent those of the presenter, and do not necessarily represent an official FDA position.
- The labeling examples in this presentation are provided only to demonstrate current labeling development challenges and should not be considered FDA recommended templates.
- Reference to any marketed products is for illustrative purposes only and does not constitute endorsement by the FDA.

Objectives



- Instructions for Use Background
- Content Recommendations from the Instructions for Use Draft Guidance
- Page Layout and Design Recommendations from the Instructions for Use Draft Guidance

Instructions for Use (IFU) Background

What is an Instruction for Use (IFU) Document?



- Instructions for Use (IFU) is:
 - Form of prescription drug labeling
 - Generally created for drug products that have complicated or detailed patient-use instructions
 - Reviewed and approved by FDA under an NDA, BLA, or ANDA
 - Generally provided to patients when drug product is dispensed

Content of an IFU



- IFU should contain detailed, action-oriented, step-by-step written and visual instructions provided in a patient-friendly manner
 - Written instructions on preparation, administration, handling, storage, and disposal
 - Visuals that complement written instructions

IFU Draft Guidance



- Title:
 - Instructions for Use — Patient Labeling for Human Prescription Drug and Biological Products and Drug-Device and Biologic-Device Combination Products— Content and Format
- Published:
 - July 2019
- Available online:
 - See FDA website at:
 - <https://www.fda.gov/media/128446/download>

Purpose of the IFU Guidance

- Provide recommendations to help industry develop consistent content and format of IFU documents
- Recommendations are aimed at helping ensure patients receive clear, concise information about prescription products that is easily understood
- Goal is to help guide patient understanding of how to use their prescription drug products

Scope of Guidance

- Applies to:
 - Prescription drug products, including human prescription drug and biological products
- Not intended for:
 - Devices regulated under a BLA
 - Labeling for standalone medical devices – separate guidance from CDRH, [Guidance on Medical Device Patient Labeling](#)
 - Labeling directed at health care providers

IFU Document Submissions

- Applicants should submit:
 - Word copy of the IFU that accompanies the Prescribing Information for review and approval by FDA
 - True representations of both the content and format of the IFU
 - For example: page layout, graphic design, and color
- FDA will review and provide comments in the word version of the IFU

IFU Relationship to the Prescribing Information (PI)



- Typically information from the following PI sections are included in the IFU
 - DOSAGE AND ADMINISTRATION
 - HOW SUPPLIED/STORAGE AND HANDLING
 - PATIENT COUNSELING INFORMATION
- IFU may also contain additional details (not in the PI) that are important for patient's safe and effective use of the drug product
- Additional details not typically discussed in the PI that are important for the patients safe and effective use of the drug product

Content Recommendations from the Instructions for Use Draft Guidance

(1) **INSTRUCTIONS FOR USE**

(2) **[Insert Product Title]**

(3) This “Instructions for Use” contains information on how to [insert applicable action verb¹] **[Insert Drug Name²]**

(4) [Insert visual of drug product]

(5) **Important Information You Need to Know Before [Insert Applicable Action Verb³] [Insert Drug Name]**

(6) **Preparing to [Insert Applicable Action Verb⁴] [Insert Drug Name]**

(7) **[Insert Applicable Action Verb⁵] [Insert Drug Name]**

(8) **Storing [Insert Drug Name]**

(9) **Disposing of [Insert Drug Name]**

(10) [Insert resources for additional information on how to use the drug product (for example, a telephone number that patients can call to speak with a customer service representative)]

(10) [Insert name and place of business of manufacturer, packer, or distributor of drug product]

(10) This “Instructions for Use” has been approved by the U.S. Food and Drug Administration.

Approved: [insert Month Year]

or

Revised: [insert Month Year]

IFU Section Headings



- Ensure headings clearly identify the focus of each topic
- Use subheadings to group related tasks that accomplish a single objective
- Order of Headings - the information presented should appear in the following order:
 1. Title
 2. Product Title
 3. Purpose Statement
 4. Visual of Drug Product
 5. Important Information for Patients
 6. Preparation Instructions
 7. Administration Instructions
 8. Storage Instructions
 9. Disposal Instructions
 10. Additional Information

Instructions for Use Title

- Title “INSTRUCTIONS FOR USE” should appear centered prominently at top of first page of IFU, in bold uppercase letters.



Product Title

- Includes the items below in this order
 - Proprietary name* (if any)
 - Nonproprietary name
 - Dosage form, and
 - Route of administration
- Should appear at the beginning of the line below the IFU title
- Product title should be centered and be presented in bold letters

* If there is a proprietary name, it should include the pronunciation spelling after the proprietary name. If there is no proprietary name, the pronunciation spelling of the chemical portion of the nonproprietary name should follow the nonproprietary name

Product Title Examples



Example 1: Drug Product With a Proprietary Name

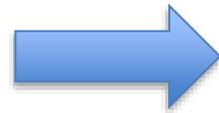


INSTRUCTIONS FOR USE
MYDRUG [mye-drug]
(drugoxide injection)
for intramuscular use

Product Title Examples



Example 2: Biologic Product With a Proprietary Name



INSTRUCTIONS FOR USE
MYBIOLOGIC [my-bye-oh-LAH-jik]
(replicamab-cznm)
injection, for subcutaneous use

Product Title Examples



Example 3: Drug Product Without a Proprietary Name



INSTRUCTIONS FOR USE
Drugoxide Injection [drug-OX-ide]
for intramuscular use

Product Title Examples



Example 4: Drug Product Without a Proprietary Name and Includes a Transdermal System

 **INSTRUCTIONS FOR USE**
Drugoxide Transdermal System [drug-OX-ide]

Purpose Statement



- Appears below the product title
- Informs the patient about the IFU contents – why it was created

**INSTRUCTIONS FOR USE
MYDRUG [mye-drug]
(drugoxide injection)
for intramuscular use**

This “Instructions for Use” contains information on how to inject MYDRUG.

Visual of Drug Product

- Examples:
 - Photograph
 - Simple illustration
 - Line drawing
- Clearly identify and label each part of the drug product, including device components, and the purpose or use of the components, where applicable
- Include a visual of a drug product in an oral dosage form where manipulation is necessary to prepare and administer a dose

Important Information for Patients



- Include specific, critical actions to prepare, administer, store, or dispose of the drug product
- Generally intended to prevent or reduce potentially dangerous consequences that might occur if a specific action is not followed

**INSTRUCTIONS FOR USE
MYDRUG [mye-drug]
(drugoxide injection)
for intramuscular use**

This “Instructions for Use” contains information on how to inject MYDRUG.

VISUAL

Important Information You Need to Know Before Injecting MYDRUG

Important Information for Patients: Content Examples



- Example 1:
 - Where there is potential for confusion about route of administration based on dosage form
 - Include statement that explains how drug product should be administered
 - For oral use only (take by mouth)
- Example 2:
 - Where timing of a dose is specified relative to a behavior or action
 - Take [Insert Drug Name] 1 hour before eating.

Important Information for Patients: Content Examples



- Example 3:
 - Safety information or other important instructions specifically related to administration
 - Inject [Insert Drug Name] into the thigh. Do not inject [Insert Drug Name] into any other area of the body.
- Example 4:
 - Prevention or mitigation of risk of secondary exposure to drug
 - To prevent the transfer of [Insert Drug Name] from your body to others, avoid direct skin contact or cover the areas of your body where [Insert Drug Name] has been applied.

Preparation Instructions



- Specific instructions patients need to prepare the drug product or drug-device combination for administration

**INSTRUCTIONS FOR USE
MYDRUG [mye-drug]
(drugoxide injection)
for intramuscular use**

...

Preparing to Inject MYDRUG

Preparation Instruction Examples

- Supplies and materials for administering the dose
- Amount of time required to warm a refrigerated product to room temperature
- Maximum amount of time the product may remain unrefrigerated before use
- Check the expiration date on the product's label
- Check the drug product for particles or discoloration
- How to insert a co-packaged bottle adaptor

Administration Instructions

- Appear as logically ordered, detailed, step-by-step instructions
- Provided so patients can safely and effectively take or administer drug product

INSTRUCTIONS FOR USE
MYDRUG [mye-drug]
(drugoxide injection)
for intramuscular use

...

Injecting MYDRUG

Administration Instruction Examples

- Instructions on how to apply a transdermal system
- Instructions on how to use an auto-injector
- Instructions for injecting the drug product
- Instructions on how to actuate an inhaler to ensure appropriate dosing

Storage Instructions

- Instructions on how to prepare the product for storage
 - Examples: disassembly instructions, washing or cleaning
- A description of storage conditions
 - Examples: refrigerating the drug product, storing away from light

INSTRUCTIONS FOR USE
MYDRUG [mye-drug]
(drugoxide injection)
for intramuscular use

...

Storing MYDRUG

Disposal Instructions

- Include this heading when there are specific disposal instructions to prevent the risk of unintended exposure to or harm from products
 - Example: certain transdermal system

INSTRUCTIONS FOR USE
MYDRUG [mye-drug]
(drugoxide injection)
for intramuscular use

 ...
Disposal of MYDRUG

Disposal Instruction Examples

- Example 1:
 - Include appropriate safe sharps disposal language for items that present a risk of needle stick injury or infection, such as auto-injectors, auto-pens, syringes

- Example 2:
 - provide specific information for patients on how to appropriately dispose of the drug product for drug products that require special disposal procedures, such as outpatient chemotherapeutic drug products

Additional Information



- Located at the bottom of the last page of the IFU
- Contains resources for additional information on how to use the drug product, where applicable
 - For example, a telephone number patients can call to speak with a customer service representative
- For drug products, include the name and place of business of the manufacturer, packer, or distributor
- For biological products, include the name and place of business of the manufacturer or distributor
- The last line of the IFU should provide:
 - The following statement, *This “Instructions for Use” has been approved by the U.S. Food and Drug Administration*
 - The date of initial FDA approval of the IFU, or revised date

Page Layout and Design Recommendations from the Instructions for Use Draft Guidance

Font and Font Size

- Sans-serif style fonts that should be used for all text in the IFU include:
 - Verdana
 - Arial
- Font size should be no smaller than 10 points with the exception of certain sections noted below, which can use a font size no smaller than 8 points
 - Name and place of business of the manufacturer, packer, or distributor
 - Verbatim statement: This “Instructions for Use” has been approved by the U.S. Food and Drug Administration
 - Date of FDA approval or revision of IFU

Letter Case

- Title “INSTRUCTIONS FOR USE” should appear in all uppercase letters
- Proprietary name or nonproprietary name used in the body of the IFU should match its appearance in the full Prescribing Information
- All other headings in the IFU should appear in title case

Bold, Italicized, or Underlined Text

- Following should appear in bold type
 - INSTRUCTIONS FOR USE;
 - Product title, including drug name(s), pronunciation spelling, dosage form, and route of administration
 - Headings
 - Step numbers, and
 - Figure titles

Step-by-Step Instructions

- Instructions should be sequentially numbered, with each step heading appearing in bold type and noted as “Step 1, Step 2,” etc.
- Use continuous numbering throughout the document
- Ensure action-oriented instructions appear before any supporting information particular to performing a step

INSTRUCTIONS FOR USE
MYDRUG [mye-drug]
(drugoxide injection)
for intramuscular use

...

Injecting MYDRUG

...

Step 4. Check the liquid by looking through the viewing window (**Figure F**).

- The liquid should be yellow and should have no lumps or particles.
- You may see air bubbles. This is normal.

Visuals for Step-by-Step Instructions

- Accompany steps classified as critical tasks
- Easy to understand and are of an adequate size
- Demonstrate one concept, single idea, or point of information
- Placed immediately adjacent to the related instructional step
- Labeled alphabetically in bold type

Spacing

- Maintain a sufficient balance of text, visuals, and white space
- Use white space between blocks of text to separate concepts and to indicate change
- Consider increasing the amount of white space around important text and visuals for emphasis

Use of Color

- Presented in black type on a white background to facilitate readability
- Colored text and visuals may be useful where all text and visuals maintain clarity and remain legible when the IFU is printed in black and white or in grayscale



(1) **INSTRUCTIONS FOR USE**
(2) **[Insert Product Title]**

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or

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Next Steps

- Comment period for the Instructions for Use Guidance closed on September 3, 2019
- All comments can be reviewed online in [the Guidance docket](#)
- FDA is currently reviewing the comments and will consider the information as they consider the final Guidance

Patient Labeling Specific Resources

(also available on the Prescription Drug Labeling Resource webpage)

- [Instructions for Use - Patient Labeling for Human Prescription Drug and Biological Products and Drug-Device and Biologic-Device Combination Products \(draft guidance\)](#)
 - Instructions for Use (IFU) are a type of FDA-approved patient labeling for drugs that have complicated or detailed patient-use instructions. The IFU provides detailed, action-oriented, step-by-step written and visual instructions for the patient on how to use the drug including instructions on preparation, administration, handling, storage, and disposal.
- [Medication Guides:](#)
 - Medication Guides are a type of FDA-approved patient labeling for drugs used primarily on an outpatient basis when the FDA determines that it is necessary for patient's safe and effective use.
 - Medication Guide regulations are provided in 21 CFR 208
- Package Package Inserts (PPIs):
 - are a type of FDA-approved patient labeling that are required for oral contraceptives ([21 CFR 310.501](#)) and estrogen-containing products ([21 CFR 310.515](#)). PPIs are voluntary for other prescription drug products.

Question 1



An Instructions for Use (IFU) is:

- a) A form of prescription drug labeling created for drug products that have complicated or detailed patient-use instructions
- b) Reviewed and approved by FDA under an NDA, BLA, or ANDA
- c) Generally provided to patients when the drug product is prescribed
- d) Both a) and b)
- e) Both b) and c)
- f) All of the above

Question 2



All of the following are Instructions for Use (IFU) headings, except for:

- a) Title
- b) Purpose Statement
- c) Visual of Drug Product
- d) Holiday Preparation Instructions
- e) Disposal Instructions