DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Silver Spring, MD 20993

Funmi Johnson, PharmD
Senior Associate, Regulatory Affairs, Advertising and Promotion
Hospira, Inc., a Pfizer Company
275 N. Field Drive, Dept. 0392, Bldg. H2-2NW
Lake Forest, IL 60045

RE: NDA 021038
Precedex™ (dexmedetomidine hydrochloride) Injection
MA 268

Dear Dr. Johnson:

As part of its routine monitoring and surveillance program, the Office of Prescription Drug Promotion (OPDP) of the U.S. Food and Drug Administration (FDA) has reviewed a video posted on the website *YouTube.com* titled, *What to Expect: Hospira Precedex (dexmedetomidine HCl Injection)* by Hospira, Inc. (Hospira) for Precedex™ (dexmedetomidine hydrochloride) injection (Precedex).[1] The video is false or misleading because it omits risks and material facts associated with Precedex. Thus, the video misbrands Precedex within the meaning of the Federal Food, Drug, and Cosmetic Act (FD&C Act), and makes its distribution violative. 21 U.S.C. 352(a) & (n); 321(n); 331(a). *See* 21 CFR 202.1(e)(5). Hospira also did not comply with 314.81(b)(3)(i). These violations are concerning from a public health perspective because they create a misleading impression about the safety and effectiveness of Precedex.

Background

Below are the indication and summary of the most serious and most common risks associated with the use of Precedex.[2]

According to its FDA-approved product labeling (PI), Precedex is indicated for sedation of initially intubated and mechanically ventilated patients during treatment in an intensive care setting. Precedex should be administered by continuous infusion not to exceed 24 hours. Precedex has been continuously infused in mechanically ventilated patients prior to extubation, during extubation, and post-extubation. It is not necessary to discontinue Precedex prior to extubation. Precedex is also indicated for sedation of non-intubated patients prior to and/or during surgical and other procedures.

[1] Found at https://www.youtube.com/watch?v=sX0aHo-DomQ (last accessed: January 14, 2016). This video also appeared on the Precedex website at http://precedex.com/what-to-expect/.
[2] This information is for background purposes only and does not necessarily represent the risk information that should be included in the promotional piece cited in this letter.

The PI for Precedex contains warnings and precautions regarding drug administration, hypotension, bradycardia, sinus arrest, transient hypertension, arousability, withdrawal, tolerance, tachyphylaxis, and hepatic impairment. The most common adverse reactions observed with Precedex are hypotension, bradycardia, and dry mouth.

Omission of Risk Information

Promotional materials are misleading if they fail to reveal facts that are material in light of representations made or with respect to consequences that may result from the use of the drug as recommended or suggested by the materials. The video contains numerous efficacy claims for Precedex, but fails to include risk information associated with the use of the drug. Furthermore, while the video alludes to arousability, this is presented as a benefit (i.e., what makes it "different" than other sedatives), instead of a warning and precaution. By omitting the risks associated with Precedex, the video fails to provide material information about the consequences that may result from the use of the drug and creates a misleading impression about the drug's safety.

Omission of Material Fact

The video makes representations about the use of Precedex for intensive care unit sedation, but it is misleading because it fails to communicate material information regarding the FDA-approved indication for Precedex. Specifically, the INDICATIONS AND USAGE section of the PI states the following in pertinent part: "Precedex is indicated for sedation of initially intubated and mechanically ventilated patients during treatment in an intensive care setting. Precedex should be administered by continuous infusion not to exceed 24 hours."

Failure to Submit Under Form FDA-2253

FDA regulations require companies to submit any labeling or advertising devised for promotion of the drug product at the time of initial dissemination of the labeling and at the time of initial publication of the advertisement for a prescription drug product. Each submission is required to be accompanied by a completed transmittal Form FDA-2253 (Transmittal of Advertisements and Promotional Labeling for Drugs for Human Use) and is required to include a copy of the product's current product labeling. A copy of the video was not submitted to OPDP under cover of Form FDA-2253 at the time of initial dissemination as required by 21 CFR 314.81(b)(3)(i).

Conclusion and Requested Action

For the reasons discussed above, the video misbrands Precedex within the meaning of the FD&C Act and makes its distribution violative. 21 U.S.C. 352(a) & (n); 321(n); 331(a). *See* 21 CFR 202.1(e)(5). Furthermore, Hospira did not comply with 21 CFR 314.81(b)(3)(i).

OPDP requests that Hospira immediately cease violating the FD&C Act, as described above. Please submit a written response to this letter on or before January 29, 2016, stating whether you intend to comply with this request, listing all promotional materials (with the 2253 submission date) for Precedex that contain violations such as those described above, and explaining your plan for discontinuing use of such violative materials.

Please direct your response to the undersigned at the **Food and Drug Administration, Center for Drug Evaluation and Research, Office of Prescription Drug Promotion, 5901-B Ammendale Road, Beltsville, Maryland 20705-1266.** A courtesy copy can be sent by facsimile to (301) 847-8444. To ensure timely delivery of your submissions, please use the full address above and include a prominent directional notation (e.g. a sticker) to indicate that the submission is intended for OPDP. Please refer to MA 268 in addition to the NDA number in all future correspondence relating to this particular matter. All correspondence should include a subject line that clearly identifies the submission as a Response to Untitled Letter. OPDP reminds you that only written communications are considered official.

The violations discussed in this letter do not necessarily constitute an exhaustive list. It is your responsibility to ensure that your promotional materials for Precedex comply with each applicable requirement of the FD&C Act and FDA implementing regulations.

Sincerely,

{See appended electronic signature page}

Jessica M. Fox, PharmD, RAC
Regulatory Review Officer
Office of Prescription Drug Promotion

{See appended electronic signature page}

Samuel M. Skariah, PharmD, RAC
Team Leader
Office of Prescription Drug Promotion

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

JESSICA M FOX
01/14/2016

SAMUEL M SKARIAH
01/14/2016