

MEMORANDUM
Department of Health and Human Services
Public Health Service
Food and Drug Administration
Center for Biologics Evaluation and Research

Date: January 7, 2016

From: Oluchi Elekwachi, PharmD, MPH
Regulatory Review Officer
Advertising and Promotional Labeling Branch (APLB)
Division of Case Management

Through: Lisa L. Stockbridge, Ph.D.
Branch Chief
Advertising and Promotional Labeling Branch (APLB)
Division of Case Management

To: Christina Houck, RPM, OVRD/DVRPA/CMC1
Elizabeth Valenti, RPM, OVRD/DVRPA/CMC1
Ronald Rabin, M.D., Clinical Reviewer, OVRD/DBPAP

Subject: Labeling Review
Rubber Panel T.R.U.E. TEST (Thin-Layer Rapid Use Epicutaneous Patch Test)
New STN: 125579/0
Former STN: 103738/5031

Sponsor: SmartPractice Denmark ApS

Background: The sponsor submitted:

<input checked="" type="checkbox"/>	New Approval (Complete Response)
<input type="checkbox"/>	Changes Being Effectuated (CBE) supplement
<input type="checkbox"/>	Prior Approval Supplement (PAS)
<input type="checkbox"/>	Major Amendment

Submission contains:

<input checked="" type="checkbox"/>	Prescribing Information (PI)
<input type="checkbox"/>	Patient Package Insert (PPI)
<input checked="" type="checkbox"/>	Carton and/or container labels

APLB Comments/Recommendations

This labeling review is for a Complete Response to an Original Submission submitted by SmartPractice Denmark ApS on August 27, 2015, for Rubber Panel T.R.U.E. TEST (Thin-Layer Rapid Use Epicutaneous Patch Test). This application, originally submitted on January 5, 2006, has received Complete Response (CR) letters on June 30, 2006, February 12, 2007, and January 12, 2015. The response contains updated labeling for the Rubber Panel T.R.U.E. TEST product to include the revised Package Insert (PI) containing pediatric data and language, carton and container label, and a foil covering for the panel. T.R.U.E. TEST shared the same numerical STN 103738 listing as Rubber Panel T.R.U.E. TEST. To avoid confusion between the two marketed products, Rubber Panel T.R.U.E. TEST was assigned a new BLA STN. The action due date for this file is February 26, 2016. Upon reviewing this submission, APLB has the following comments from a promotional and comprehension perspective.

GENERAL

- When possible, use active voice and command language throughout the entire prescribing information.
- Consistently apply the use of term ‘allergens’ rather than ‘allergen and allergenic mixes’ or chemicals.
- Consistently write out the names 5 allergens rather referring to them as ‘5 allergens’

HIGHLIGHTS

INDICATIONS AND USAGE

APLB recommends rewording this section to read as follows:

“Rubber Panel T.R.U.E. TEST is an epicutaneous patch test indicated for use as an aid in the diagnosis of allergic contact dermatitis in persons 6 years of age and older with symptoms and history consistent with allergic contact dermatitis to rubber.”

DOSAGE AND ADMINISTRATION

APLB recommends rewording this section to read as follows:

“For topical use only.

Apply the adhesive panel of allergens on healthy skin of the back. After 48 hours, remove panels and evaluate the skin. Re-evaluate the skin 72 to 96 hours after application. (2)”

DOSAGE FORMS AND STRENGTH

APLB recommends rewording this section to read as follows:

“One adhesive panel consisting of 5 allergen patches (Carba mix, Black rubber mix, Mercapto mix, Thiuram mix, and Mercaptobenzothiazole) and a negative control.”

CONTRADICTIONS

APLB recommends rewording this section to read as follows:

“Do not apply to skin of patients with a history of severe contact dermatitis (systemic and/or local) to the components of darba mix, black rubber mix , ormercapto mix, thiuram mix, mercaptobenzothiazole or to inactive substances of Rubber Panel T.R.U.E. TEST.”

REVISION DATE

This is an original label. No revision date is needed.

FULL PRESCRIBING INFORMATION: CONTENTS

Ensure that the CONTENTS are consistent with the FULL PRESCRIBING INFORMATION.

FULL PRESCRIBING INFORMATION

1 INDICATIONS AND USAGE

Consider wording the indication to be more specific such as:

“Rubber Panel T.R.U.E. TEST ® is an epicutaneous patch test indicated for use as a diagnostic aid for allergic contact dermatitis (ACD) in persons 6 years of age and older with symptoms or history consistent with allergic contact dermatitis to compnents in the carba mix, black rubber mix, mercapto mix, thiuram mix, or mercaptobenzothiazole.”

2 DOSAGE AND ADMINISTRATION

Place the bolded phrase “**For topical use only.**” directly beneath this section header.

APLB recommends inclusion of the false negative warning in the WARNINGS AND PRECAUTIONS section as detailed in the WARNINGS AND PRECAUTIONS section of this review.

4 CONTRAINDICATIONS

APLbB recommends rewording this section to read as follows:

“Do not apply to skin of patients with a history of severe allergic reactions (system and/or local) to carba mix, Black rubber mix, mercapto mix, thiuram mix, mercaptobenzothiazole, or any of the inactive substances of Rubber Panel T.R.U.E. Test *[see Description (11)]*.”

5 WARNINGS AND PRECAUTIONS

- APLB recommends addition of an additional subsection as detailed below:

“5.10 False Negatives

False negatives may occur at a result of testing 3 weeks after ultraviolet (UV) treatments, heavy sun or tanning bed exposure.

- The preferred presentation for cross references is the section header followed by the numerical identifier. Please revise cross references in this section accordingly. For example,

[*See Dosage and Administration (2.3)*]

6 ADVERSE REACTIONS

- Immediately following the section header, add the most commonly reported adverse reactions with a cut-off frequency rate. This list is the same list presented in the ADVERSE REACTIONS section of the HIGHLIGHTS.
- The pediatrics clinical trial experience subheading read:
Pediatric Study Participants Aged 6 and Older
- APLB recommends the removal of the proposed Table 3: Total Adverse Events After Removal of Rubber Panel T.R.U.E. Test Allergens in Children as it adds no additional information.

8 USE IN SPECIAL POPULATIONS

Consider revising subsection 8.1 Pregnancy, making subsection 8.2 Lactation, deleting the current subsection 8.3 Nursing Mothers to conform to the new Pregnancy and Lactation Labeling Rule (PLLR). Please refer to the [*Guidance for Industry: Pregnancy, Lactation, and Reproductive Potential: Labeling for Human Prescription Drug and Biological Products – Content and Format*](#) for more information and guidance on how to revise these sections.

APLB recommends rewording this section to read:

8.4 Pediatric Use

Rubber Panel T.R.U.E. Test was evaluated in 102 pediatric subjects (age range 6 – 18 years). There were no obvious differences observed between adults and pediatric subjects with respect to pharmacokinetics, efficacy and safety. No pediatric specific dose requirements were necessary to evaluate results of the test.

Of the evaluated pediatric subjects suspected to have an allergic contact dermatitis based on symptoms and history and physical exam, a total of 17 subjects had a positive reaction to at least one of the 5 rubber allergens (carba mix, black rubber mix, mercapto mix, thiuram mix, or mercaptobenzothiazole).

16 HOW SUPPLIED/STORAGE AND HANDLING

For readability, consider bulleting or spacing to delineate concepts.

CARTON AND CONTAINER

- The NDC number is not easily located and is buried with the information listing the manufacturer. We recommend moving the NDC number of the proposed principal display panel to the top third section of the panel directly above the established name.
- To promote the safe use of this product, we recommend adding the route of administration directive “For topical use” to the carton and container labeling.

Labeling Review
Rubber Panel T.R.U.E. TEST
STN: 125579/0
Sponsor: SmartPractice

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If you have any questions regarding this review please contact Oluchi Elekwachi, Regulatory Review Officer, at 240-402-8930.