

### **Prescription Drug Labeling Updates**

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Regulatory Education for Industry Annual Conference 2022

### **Learning Objectives**



- Understand the status of required and voluntary Physician Labeling Rule (PLR) conversions
- Provide an overview of key recommendations in recently published labeling guidances
- Learn about new prescription drug labeling resources
  - Distinguish between labeling databases (i.e., Drugs@FDA, DailyMed, and FDALabel)



# Physician Labeling Rule (PLR) Conversions

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### **Prescribing Information**

### "Old" Format Labeling Sections 1979

BOXED WARNING

DESCRIPTION

CLINICAL PHARMACOLOGY

INDICATIONS AND USAGE

CONTRAINDICATIONS

WARNINGS

#### **PRECAUTIONS**

ADVERSE REACTIONS

DRUG ABUSE AND DEPENDENCE

OVERDOSAGE

DOSAGE AND ADMINISTRATION

HOW SUPPLIED

#### PLR Format<sup>2</sup>

(Full Prescribing Information Sections)



- 1 INDICATIONS AND USAGE
- 2 DOSAGE AND ADMINISTRATION
- 3 DOSAGE FORMS AND STRENGTHS
- 4 CONTRAINDICATIONS
- 5 WARNINGS AND PRECAUTIONS
- 6 ADVERSE REACTIONS
- DRUG INTERACTIONS
- 8 USE IN SPECIFIC POPULATIONS

- 8.1 Pregnancy
- 8.2 Lactation
- 8.3 Females and Males of Reproductive Potential
- 8.4 Pediatric Use
- 8.5 Geriatric Use
- 9 DRUG ABUSE AND DEPENDENCE
  - 9.1 Controlled Substance
  - 9.2 Abuse
  - 9.3 Dependence
- 10 OVERDOSAGE
- 11 DESCRIPTION
- 12 CLINICAL PHARMACOLOGY
  - 12.1 Mechanism of Action
  - 12.2 Pharmacodynamics
  - 12.3 Pharmacokinetics
- 13 NONCLINICAL TOXICOLOGY
  - 13.1 Carcinogenesis, Mutagenesis, Impairment of Fertility
- 13.2 Animal Toxicology and/or Pharmacology
- 14 CLINICAL STUDIES
- 15 REFERENCES
- 16 HOW SUPPLIED/STORAGE AND HANDLING
- 17 PATIENT COUNSELING INFORMATION



2006

<sup>&</sup>lt;sup>1</sup> "Labeling and Prescription Drug Advertising; Content and Format for Labeling for Human Prescription Drugs"; 44 FR 37434 (June 26, 1979), 21 CFR 201.80

<sup>&</sup>lt;sup>2</sup> "Requirements on Content and Format of Labeling for Human Prescription Drug and Biological Products,"; 71 FR 392221 (January 24, 2006), CFR 201.56(d) and 21 CFR 201.57

### CDER-Regulated NDA/BLA Prescribing Information with PLR Format<sup>1</sup>



Month/Year	Proportion of CDER PI With PLR Format (NDAs/BLAs only)
January 2014	~ 45%
January 2016	~ 56%
January 2017	~ 61%
January 2018	~ 63%
March 2019	~ 66%
August 2020	~ 70%
April 2022	~ 71%

NDAs = New Drug Applications; BLAs = Biologics License Applications; PI = Prescribing Information;

<sup>&</sup>lt;sup>1</sup> Analyses based on Structured Product Labeling (SPL) - generally only includes <u>marketed</u> products; excludes labeling from repackagers, relabelers, and authorized generics

### CDER NDA/BLA Labeling in PLR Format (Required and Voluntary PLR Conversions)<sup>1</sup>



	NDAs, BLAs, and/or ESs	Proportion of Labeling with PLR Format	Keep Up The Good Work
Required	NDAs/BLAs/ESs approved on or after 6/30/2001	100% ሩ	In 2013 ~71% in PLR format
Voluntary	NDAs/BLAs approved from <b>1938 to 6/29/2001</b> (without an ES approved on or after 6/30/2001)	~26%	In 2012 ~1% in PLR format

CDER has approved 320 voluntary PLR conversions!

### CDER Encourages Submission of Voluntary PLR Conversions



- ➤ "PLR format represents a more useful ... approach for communicating accurate and up-to-date information on the safe and effective use of drugs and makes prescription information more accessible for use with electronic prescribing tools" 1
- ➤ "FDA strongly encourages all applicants to voluntarily convert the labeling of their drug products to the PLR format, regardless of the date of approval" 1

320 voluntary PLR conversions approved to date in CDER!

<sup>&</sup>lt;sup>1</sup> See 78 FR 8446 (February 6, 2013); also see final rule (PLR) "Requirements on Content and Format of Labeling For Human Prescription Drug and Biological Products" 71 FR 3922 (January 24, 2006)



# Recently Published Notable Labeling Guidances

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# Pediatric Information Incorporated Into Human Prescription Drug and Biological Product Labeling Guidance for Industry

U.S. Department of Health and Human Services
Food and Drug Administration
Center for Drug Evaluation and Research (CDER)
Center for Biologics Evaluation and Research (CBER)

March 2019 Labeling

BOXED WARNING
1 INDICATIONS AND USAGE
2 DOSAGE AND ADMINISTRATION
3 DOSAGE FORMS AND STRENGTHS
4 CONTRAINDICATIONS
5 WARNINGS AND PRECAUTIONS
6 ADVERSE REACTIONS
7 DRUG INTERACTIONS
8 USE IN SPECIFIC POPULATIONS
8.1 Pregnancy
8.2 Lactation
8.3 Females and Males of Reproductive Potential
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8.4 Pediatric Use
8.5 Geriatric Use
8.5 Geriatric Use
8.5 Geriatric Use 9 DRUG ABUSE AND DEPENDENCE
8.5 Geriatric Use 9 DRUG ABUSE AND DEPENDENCE 10 OVERDOSAGE
8.5 Geriatric Use 9 DRUG ABUSE AND DEPENDENCE 10 OVERDOSAGE 11 DESCRIPTION
8.5 Geriatric Use  9 DRUG ABUSE AND DEPENDENCE  10 OVERDOSAGE  11 DESCRIPTION  12 CLINICAL PHARMACOLOGY
8.5 Geriatric Use 9 DRUG ABUSE AND DEPENDENCE 10 OVERDOSAGE 11 DESCRIPTION 12 CLINICAL PHARMACOLOGY 12.1 Mechanism of Action
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# Full Prescribing Information Sections and Subsections<sup>1</sup>

<sup>&</sup>lt;sup>1</sup> Several required sections (i.e., Sections 13, 14, 15, 16, and 17) are not shown for presentation purposes

# Four Scenarios for Including Pediatric Use Information in Labeling



- ➤ Evidence supports safety and effectiveness of drug for a pediatric indication (Scenario 1)
- Evidence does <u>not</u> support safety and effectiveness of a drug for a pediatric indication:
  - Results of pediatric studies were negative or inconclusive (Scenario 2)
  - No evidence available studies not conducted or are ongoing (Scenario 3)
  - Drug is contraindicated (Scenario 4)

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# **Ensure a Consistent Message in the Labeling About the Approved Pediatric Age Groups**



### 1 INDICATIONS AND USAGE

DRUG X is indicated for the treatment of Indication Y in adults and pediatric patients aged 6 years and older.

### **8 USE IN SPECIFIC POPULATIONS**

...

### 8.4 Pediatric Use

The safety and effectiveness of DRUG X (for Indication Y) have been established in pediatric patients aged 6 years and older. The safety and effectiveness of DRUG X (for Indication Y) have not been established in pediatric patients younger than 6 years old.

## Pediatric Use Subsection: "Pediatric Use Statements" 1



- ➤ Generally, "pediatric use statements" are required in the *Pediatric Use* subsection<sup>2</sup>
- Include "pediatric use statements" for all indications in adult and pediatric patients and all pediatric populations

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<sup>1</sup> Pediatric use statement is a statement explaining whether the safety and effectiveness of a drug for a specific use or indication have (or have not) been established in the entire pediatric population or in a pediatric subpopulation

<sup>&</sup>lt;sup>2</sup> 21 CFR 201.57(c)(9)(iv)

### Pediatric Use Subsection: Examples of "Pediatric Use Statements"



- ➤ "The safety and effectiveness of DRUG X (for Indication Y) have been established in pediatric patients aged 6 years and older."
- ➤ "The safety and effectiveness of DRUG X have not been established in pediatric patients (for Indication Y). ✓
- ➤ "DRUG X is contraindicated in pediatric patients ..."1 ✓
- "DRUG X was studied in 98 pediatric patients 6 years old and older with Disease-A" X

<sup>&</sup>lt;sup>1</sup> For a contraindication in pediatric patients, an alternative recommended pediatric use statement is shown (instead of stating that safety and effectiveness have not been established in pediatric patients) [see 21 CFR 201.57(c)(9)(iv)(G)]





### Geriatric Information in Human Prescription Drug and Biological Product Labeling Guidance for Industry

#### DRAFT GUIDANCE

This guidance document is being distributed for comment purposes only.

Comments and suggestions regarding this draft document should be submitted within 60 days of publication in the *Federal Register* of the notice announcing the availability of the draft guidance. Submit electronic comments to https://www.regulations.gov. Submit written comments to the Dockets Management Staff (HFA-305), Food and Drug Administration, 5630 Fishers Lane, Rm. 1061, Rockville, MD 20852. All comments should be identified with the docket number listed in the notice of availability that publishes in the *Federal Register*.

For questions regarding this draft document, contact (CDER) Eric Brodsky at 301-796-0855, or (CBER) the Office of Communication, Outreach, and Development at 800-835-4709 or 240-402-8010.

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3	DOSAGE FORMS AND STRENGTHS
4	CONTRAINDICATIONS
5	WARNINGS AND PRECAUTIONS
6	ADVERSE REACTIONS
7	DRUG INTERACTIONS
8	USE IN SPECIFIC POPULATIONS
	8.1 Pregnancy
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	12.3 Pharmacokinetics
	12.4 Microbiology
	12.5 Pharmacogenomics
	12.6 Immunogenicity

**BOXED WARNING** 

INDICATIONS AND USAGE

DOSAGE AND ADMINISTRATION

# Full Prescribing Information Sections and Subsections<sup>1</sup>

For the purposes of prescription drug labeling, the geriatric population is defined as patients 65 years of age and older<sup>2</sup>

Several required sections (i.e., Sections 13, 14, 15, 16, and 17) are not shown for presentation purposes
 2 21 CFR 201.57(c)(9)(v)(A)

### Geriatric Exposure Data Examples in Geriatric Use Subsection<sup>1</sup>



- ➤ "Of the total number of DRUG X-treated patients in these studies, n (x%) were 65 to 74 years of age, n (y%) were 75 to 84 years of age, and n (z%) were 85 years of age and older."
- ➤ "Of the total number of DRUG X-treated patients in clinical studies for Disease A, n (y%) were 65 to 74 years of age, and n (z%) were 75 years of age and older [see Clinical Studies (14)]."

<sup>&</sup>lt;sup>1</sup> The *Geriatric Use* subsection can also include information on the total number of geriatric patients in the clinical studies. For example: "There were n patients 65 years of age and older in the clinical studies for Disease A, Disease B, and Disease C [see Clinical Studies (14.1, 14.2, 14.3)]."

# Develop *Geriatric Use* Subsection Based on <u>Sufficiency</u> of Information To Detect Differences in Safety and/or Effectiveness Between Geriatric and Younger Adult Patients

- Insufficient information to detect differences in safety and/or effectiveness between geriatric and younger adult patients
- > **Sufficient** information to detect differences in safety and/or effectiveness between geriatric and younger adult patients and:
  - Differences observed
  - No differences observed

### Drug Abuse and Dependence Section of Labeling for Human Prescription Drug and Biological Products — Content and Format

Guidance for Industry

#### DRAFT GUIDANCE

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# Full Prescribing Information Sections and Subsections<sup>1</sup>

<sup>&</sup>lt;sup>1</sup> Several required sections (i.e., Sections 13, 14, 15, 16, and 17) are not shown for presentation purposes

## Controlled Substance Subsection<sup>1</sup> (scheduled drug)



If a drug is scheduled under the Controlled Substances Act (CSA),<sup>2</sup> the *Controlled Substance* subsection (subsection 9.1) must state that the drug is a controlled substance and identify the schedule. For example:

### 9 ABUSE AND DEPENDENCE

9.1 Controlled Substance

DRUG-X contains active ingredient-Y, a Schedule II controlled substance.

<sup>&</sup>lt;sup>1</sup> 21 CFR 201.57(c)(10) and draft guidance for industry: *Drug Abuse and Dependence Section of Labeling for Human Prescription Drug and Biological Products – Content and Format* (July 2019) When final this guidance, will represent the FDA's current thinking on this topic. Available at https://www.fda.gov/media/128443/download.

<sup>&</sup>lt;sup>2</sup> The list of all scheduled substances can be found at 21 CFR part 1308 (see <a href="https://www.ecfr.gov/current/title-21/chapter-II/part-1308">https://www.ecfr.gov/current/title-21/chapter-II/part-1308</a>)

### Controlled Substance Subsection<sup>1</sup> (scheduled drug)



If a drug is <u>not scheduled</u> but there is information about abuse, dependence, or tolerance in the DRUG ABUSE AND DEPENDENCE subsection,<sup>2</sup> the *Controlled Substance* subsection should state that the drug is not controlled. For example:

### 9 ABUSE AND DEPENDENCE

### 9.1 Controlled Substance

DRUG-X contains active ingredient-Y, which is not a controlled substance.

<sup>&</sup>lt;sup>1</sup> 21 CFR 201.57(c)(10) and draft guidance for industry: *Drug Abuse and Dependence Section of Labeling for Human Prescription Drug and Biological Products – Content and Format* (July 2019) When final this guidance, will represent the FDA's current thinking on this topic. Available at https://www.fda.gov/media/128443/download.

### Definitions: Abuse Subsection<sup>1</sup>



- Abuse is the intentional, non-therapeutic use of a drug, even once, for its desirable psychological or physiological effects.
- Misuse is the intentional use, for therapeutic purposes, of a drug by an individual in a way other than prescribed by a health care provider or for whom it was not prescribed.
- Drug addiction is a cluster of behavioral, cognitive, and physiological phenomena that may include a strong desire to take the drug, difficulties in controlling drug use (e.g., continuing drug use despite harmful consequences, giving a higher priority to drug use than other activities and obligations), and possible tolerance or physical dependence.

<sup>&</sup>lt;sup>1</sup> See draft guidance for industry: <u>Drug Abuse and Dependence Section of Labeling for Human Prescription Drug and Biological Products – Content and Format</u> (July 2019) When final this guidance, will represent the FDA's current thinking on this topic.

### Abuse Subsection in the DRUG ABUSE AND DEPENDENCE Section<sup>1</sup>



3. Must identify susceptible patient populations

### 9 ABUSE AND DEPENDENCE

### 9.2 Abuse

Abuse is the intentional, non-therapeutic use of a drug, even once, for its desirable psychological or physiological effects. Signs and symptoms of central nervous system stimulant abuse include the following: tachycardia, tachypnea, hypertension, sweating, dilated pupils, hyperactivity, restlessness, insomnia, decreased appetite, tremors, and vomiting. Patients at high risk of DRUG-X abuse include those with a history of prolonged use of products containing active ingredient-Y and those who use DRUG-X in combination with other abused drugs.

### **Definitions:** Dependence Subsection<sup>1</sup>



- Physical dependence is a state that develops as a result of physiological adaptation in response to repeated drug use, manifested by withdrawal signs and symptoms after abrupt discontinuation or a significant dose reduction of a drug.
- Tolerance is a physiological state characterized by a reduced response to a drug after repeated administration (i.e., a higher dose of a drug is required to produce the same effect that was once obtained at a lower dose).

<sup>&</sup>lt;sup>1</sup> See draft guidance for industry: <u>Drug Abuse and Dependence Section of Labeling for Human Prescription Drug and Biological Products – Content and Format (July 2019) When final this guidance, will represent the FDA's current thinking on this topic.</u>

### Dependence Subsection<sup>1</sup>



3. Must include principles of treating or mitigating effects of abrupt withdrawal

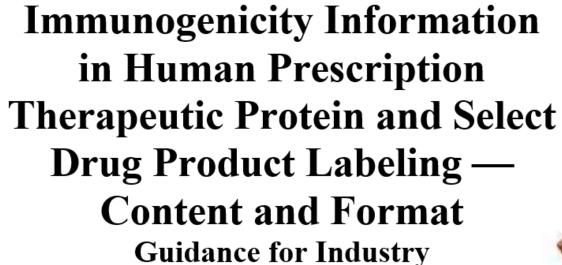
#### 9 ABUSE AND DEPENDENCE

...

### 9.3 Dependence

Physical dependence is a state that develops as a result of physiological adaptation in response to repeated drug use, manifested by withdrawal signs and symptoms after abrupt discontinuation or a significant dose reduction of a drug. If DRUG-X is abruptly discontinued in a physically dependent patient, a withdrawal syndrome may occur, typically characterized by restlessness, rhinorrhea, perspiration, chills, myalgia, and mydriasis. Discontinue DRUG-X by gradual taper over a 2-week period to reduce the risk of symptoms of withdrawal [see Dosage and Administration (2.x)].

<sup>&</sup>lt;sup>1</sup> 21 CFR 201.57(c)(10) and draft guidance for industry: <u>Drug Abuse and Dependence Section of Labeling for Human Prescription Drug and Biological Products – Content and Format (</u>July 2019) When final this guidance, will represent the FDA's current thinking on this topic.



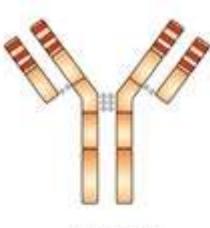
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# Historical Placement of Immunogenicity Information in Labeling<sup>1</sup>



Review of 71 therapeutic proteins and drug products approved by CDER during a recent five-year period (2014-2018) with immunogenicity information in labeling

- ➤ 98% of labeling included immunogenicity information in the ADVERSE REACTIONS section
- ➤ 30% of labeling did not include any statements regarding the immunogenicity impact on safety or effectiveness²

<sup>&</sup>lt;sup>1</sup> Guinn, D., Madabushi, R., Wang, Y., Brodsky, E., Zineh, I., and Maxfield, K. Communicating Immunogenicity-Associated Risk in Current U.S. FDA Prescription Drug Labeling: A Systematic Evaluation. Ther Innov Regul Sci (2020). https://doi.org/10.1007/s43441-020-00161-z

<sup>&</sup>lt;sup>2</sup> Categories of impact on safety or effectiveness include observed or potential impact, unknown impact, or no observed impact

# Immunogenicity Labeling Draft Guidance



Presenting immunogenicity information in a consistent manner will enable health care practitioners to more easily identify and differentiate between:

Products associated with clinically significant immunogenicity

Products whose ADA are **not** associated with clinically significant effects on PK, PD, safety, or effectiveness

BOXED WARNING
1 INDICATIONS AND USAGE
2 DOSAGE AND ADMINISTRATION
3 DOSAGE FORMS AND STRENGTHS
4 CONTRAINDICATIONS
5 WARNINGS AND PRECAUTIONS
6 ADVERSE REACTIONS
7 DRUG INTERACTIONS
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12.5 Pharmacogenomics
12.6 Immunogenicity
13 NONCLINICAL TOXICOLOGY
14 CLINICAL STUDIES
15 REFERENCES
16 HOW SUPPLIED/STORAGE AND HANDLING

ENT COUNSELING INFORMATION

# FDA Recommends a Dedicated *Immunogenicity* Subsection

Reserve other sections for description of only clinically significant effects of immunogenicity

Allows for a consistent location for summarizing immunogenicity data and its PK and PD effects



# Future Draft Labeling Guidances and Finalization of Draft Labeling Guidances

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# Notable Labeling Draft Guidances on CDER's Guidance Agenda<sup>1</sup>



- Dosage and Administration Section of Labeling for Human Prescription Drug and Biological Products — Content and Format (Revised Draft)
- ➤ Labeling for Biosimilar Products (Revised Draft)
- ➤ Human Prescription Drugs and Biological Products Labeling for Dosing Based on Weight or Body Surface Area for Readyto-Use Containers – "Dose Banding" (Draft)

# Notable Labeling Draft Guidances We Are Working to Finalize<sup>1</sup>



- Safety Considerations for Container Labels and Carton Labeling Design to Minimize Medication Errors
- Pregnancy, Lactation, and Females and Males of Reproductive Potential: Labeling for Human Prescription Drug and Biological Products
- ➤ Instructions for Use Patient Labeling for Human Prescription Drug and Biological Products and Drug-Device and Biologic-Device Combination Products Content and Format







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### FDA's Labeling Resources for Human Prescription Drugs

Prescribing Information Resources	Patient Labeling Resources	
For industry	For industry	
<b>Carton and Container Labeling Resources</b>	Selection of Appropriate SPL Codes for	
For industry	Human Prescription Drug Labeling	
	For SPL drug developers	
Generic Drugs - Specific Labeling	Biological Products - Specific Labeling	
Resources	Resources	
For industry	For industry	
FAQs About Labeling for Prescription	<b>Contact Information</b>	
Medicines	For specific application or supplement	
For healthcare professionals, patients, and caregivers	questions or for general questions about human prescription drug labeling	

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### FDA's Labeling Resources for Human Prescription Drugs

### for Industry





<sup>&</sup>lt;sup>1</sup> https://www.fda.gov/drugs/laws-acts-and-rules/prescription-drug-labeling-resources

# Prescribing Information Resources



### for Industry

Highlights of Prescribing Information	~
Boxed Warning	~
1 Indications and Usage	~
2 Dosage and Administration	~
3 Dosage Forms and Strengths	~
4 Contraindictions	~
5 Warnings and Precautions	~
6 Adverse Reactions	~
7 Drug Interactions	~

### Drugs@FDA<sup>1</sup>





f SHARE  TWEET	in Linkedin	PIN IT	<b>■</b> EMAIL	PRINT
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Search by Drug Name, Active Ingredient, or Application Number\*

Enter at least 3 characters

Search

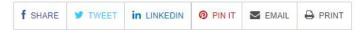
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<sup>&</sup>lt;sup>1</sup> FDA's Drugs@FDA available at <a href="https://www.fda.gov/drugsatfda">www.fda.gov/drugsatfda</a>

### Drugs@FDA FAQs1

# FDA

### **Drugs@FDA Frequently Asked Questions**



- 1. What are the main uses of Drugs@FDA?
- What products are in Drugs@FDA?
- 3. What products are not in Drugs@FDA?
- 4. Why doesn't Drugs@FDA include dietary supplements?
- 5. What information is typically available for a product in Drugs@FDA?
- 6. How can I search Drugs@FDA?
- 7. How do searches work in Drugs@FDA?
- 8. How can I find out if a generic drug is available for a brand-name drug that is approved under a New Drug Application (NDA)?
- 9. How often do you update Drugs@FDA?
- 10. Where does the information in Drugs@FDA come from?
- 11. How does Drugs@FDA compare with the Orange Book?
- 12. How does Drugs@FDA compare with the Purple Book?
- 13. How are BLAs that were formerly approved under an NDA and subsequently deemed a BLA on March 23, 2020, displayed on drugs@FDA?
- 14. What do the submission classification codes for NDAs and review designation codes stand for?
- 15. Can I get a copy of the Drugs@FDA database?
- 16. How can I get further assistance?

<sup>&</sup>lt;sup>1</sup> FDA's Drugs@FDA FAQs available at <a href="https://www.accessdata.fda.gov/scripts/cder/daf/index.cfm?event=faq.page">https://www.accessdata.fda.gov/scripts/cder/daf/index.cfm?event=faq.page</a>

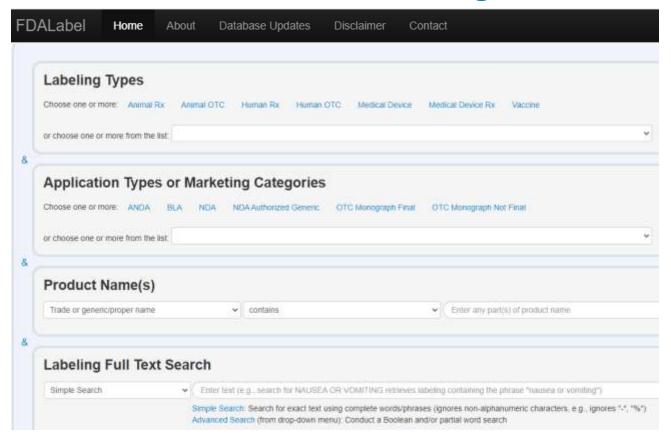
### DailyMed<sup>1</sup>





<sup>&</sup>lt;sup>1</sup> Accessed on May 14, 2022. From the National Library of Medicine at the National Institute of Health. See <a href="https://dailymed.nlm.nih.gov/dailymed/index.cfm">https://dailymed.nlm.nih.gov/dailymed/index.cfm</a>

### FDALabel: Full-Text Search of Labeling for Human Drugs<sup>1</sup>



# Labeling Section(s) Search in FDALabel<sup>1</sup>



#### Additional Fields

Product Title (123154 labeling)

Initial U.S. Approval [4 Digit Year] (19411 labeling)

Full Prescribing Information (PLR & Non-PLR)

BOXED WARNING (16037 labeling)

#### 1 INDICATIONS AND USAGE (134291 labeling)

- 2 DOSAGE AND ADMINISTRATION (134060 labeling)
- 3 DOSAGE FORMS AND STRENGTHS (21331 labeling)
- 4 CONTRAINDICATIONS (43837 labeling)
- 5 WARNINGS AND PRECAUTIONS (23509 labeling)
- 6 ADVERSE REACTIONS (44956 labeling)
- 7 DRUG INTERACTIONS (32879 labeling)
- 8 USE IN SPECIFIC POPULATIONS (20976 labeling)
- 8.1 Pregnancy (33318 labeling)
- 8.2 Lactation (6873 labeling)
- 8.2 Labor and Delivery (8464 labeling)
- 8.3 Females and Males of Reproductive Potential (2363 labeling)
- 8.3 Nursing Mothers (23469 labeling)
- 8.4 Pediatric Use (33292 labeling)

# **Labeling Databases** (1 of 2)



	Drugs@FDA	DailyMed	FDALabel
Source of data	FDA-approved labeling	Current labeling submitted by firms	Current labeling submitted by firms
Format	PDF	Structured Product Labeling	Structured Product Labeling
Products include			
CDER-approved prescription and nonprescription human drugs and biologics (under NDAs, ANDAs, and BLAs)	Yes (generic labeling rarely present)	Yes	Yes
CBER-approved human drugs and biologics (e.g., vaccines, gene-therapy products)	No	Yes	Yes
Unapproved human drugs (e.g., homopathics)	No	Yes	Yes

Search by application type or marketing category

(e.g., ANDA, BLA, NDA), DEA schedule, and/or

market status and ability to export results to an

**Excel Spreadsheet** 



Yes

Labeling Databases (2 of 2)			
	Drugs@FDA	DailyMed	FDALabel
Information included			
Approved labeling, scientific reviews	Yes	No	No
Carton and container labeling	Rarely	Yes	Yes
Repackager, relabeler, and authorized generic labeling	No	Yes	Yes
Search features			
Seach by application number or drug name	Yes	Yes	Yes
Search by drug class, NDC number, and/or by active or inactive ingredient	No	Yes	Yes
Search by labeling section	No	Somewhat	Yes

No

No

# **Challenge Question #1**



FDA recommends all applicants of NDAs/BLAs (labeling is in "old" format), <u>voluntarily</u> PLR convert their labeling in the following situation(s):

- A. Only when there are known medication errors
- B. Only when there is high drug use
- C. When there are known medication errors, high risk for consequences of medication errors, or high drug use
- D. Only when the drug was approved on or after June 30, 2001 (effective date of the Physician Labeling Rule)

# **Challenge Question #2**



If a drug is approved for Indication-A in adults and pediatric patients, Indication-B in adults only, and Indication-C in pediatric patients only; include a pediatric use statement in the *Pediatric Use* subsection for:

- A. Indication-A
- B. Indication-B
- C. Indication-C
- D. Indication-A, Indication-B, and Indication-C

### **Challenge Question #3**



Labeling on Drugs@FDA and FDALabel have the following in common:

- A. Contains most up-to-date labeling submitted to FDA
- B. Almost always includes carton and container labeling
- C. Includes historically approved labeling
- D. Almost always includes generic drug labeling
- E. None of the above

# **Closing Thoughts**



- FDA strongly encourages NDA/BLA applicants to voluntarily convert the labeling of their drugs to the PLR format, if applicable
- When developing prescription drug labeling, refer to FDA's updated prescription drug labeling resources<sup>1</sup> (e.g., newly published FDA labeling guidances)

https://www.fda.gov/drugs/laws-acts-and-rules/prescription-drug-labeling-resources



# **Questions?**

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