## Drug Interaction 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## DRAFT GUIDANCE

#### This guidance document is being distributed for comment purposes only.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be submitted within 90 days of publication in the *Federal Register* of the notice announcing the availability of the draft guidance. Submit electronic comments to <u>http://www.regulations.gov</u>. Submit written comments to the Division of Dockets Management (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) Office of Clinical Pharmacology at 301-796-5008 or CDER\_OCP\_GPT@fda.hhs.gov, or (CBER) the Office of Communication, Outreach, and Development at 800-835-4709 or 240-402-8010 or ocod@fda.hhs.gov

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)

> October 2024 Labeling

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

Additional copies are available from: Office of Communications, Division of Drug Information Center for Drug Evaluation and Research Food and Drug Administration 10001 New Hampshire Ave., Hillandale Bldg., 4<sup>th</sup> Floor Silver Spring, MD 20993-0002 Phone: 855-543-3784 or 301-796-3400; Fax: 301-431-6353 Email: druginfo@fda.hhs.gov http://www.fda.gov/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/default.htm

and/or

Office of Communication, Outreach, and Development Center for Biologics Evaluation and Research Food and Drug Administration 10903 New Hampshire Ave., Bldg. 71, Room 3128 Silver Spring, MD 20993-0002 Phone: 800-835-4709 or 240-402-8010 Email: ocod@fda.hhs.gov <u>https://www.fda.gov/vaccines-blood-biologics/guidance-compliance-regulatory-informationbiologics/biologicsguidances</u>

> 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)

> > October 2024 Labeling

Draft – Not for Implementation

## **TABLE OF CONTENTS**

I.	INTRODUCTION	;
II.	BACKGROUND	ł
III.	CONTENT AND FORMAT OF THE DRUG INTERACTIONS SECTION	5
	<ul> <li>A. Overview of the DRUG INTERACTIONS Section</li></ul>	523
IV.	CONTENT NOT INCLUDED IN THE DRUG INTERACTIONS SECTION	5
V.	DRUG INTERACTION CONTENT IN OTHER SECTIONS OF THE FULL PRESCRIBING INFORMATION	
VI.	DRUG INTERACTION CONTENT IN THE HIGHLIGHTS OF PRESCRIBING INFORMATION	)
	<ul> <li>A. Streamlining Information Under the Dosage and Administration Heading and the Drug Interactions Heading in the Highlights</li></ul>	
VII	ABBREVIATIONS	
VIII	.DEFINITIONS	ł
IX.	APPENDIX	5

Draft — Not for Implementation

## Drug Interaction Information in Human Prescription Drug and Biological Product Labeling Guidance for Industry<sup>1</sup>

This draft guidance, when finalized, will represent the current thinking of the Food and Drug Administration (FDA or Agency) on this topic. It does not establish any rights for any person and is not binding on FDA or the public. You can use an alternative approach if it satisfies the requirements of the applicable statutes and regulations. To discuss an alternative approach, contact the FDA staff responsible for this guidance as listed on the title page.

13

1

2

7 8

9

10

11 12

#### 14 15

16

#### I. INTRODUCTION

17 This guidance is intended to assist applicants of human prescription drug and biological 18 19 products<sup>2</sup> in determining the appropriate placement and content of drug interaction (DI) information in labeling as described in the regulations for the content and format of labeling for 20 human prescription drug and biological products.<sup>3,4</sup> The purpose of this guidance is to provide 21 recommendations to help ensure that appropriate DI information is consistently placed in the 22 proper sections and subsections within labeling so that the information is clear and accessible to 23 health care practitioners (HCPs) and includes content that guides the safe and effective use of the 24 drug. Applicants should follow the recommendations in this guidance when developing this 25 section of labeling for a new drug submitted to the FDA under a new drug application under 26

27 section 505(b) of the FD&C Act or a biologics license application under section 351(a) of the

<sup>3</sup> 21 CFR 201.56(a) and (d) and 201.57(c)(8).

<sup>&</sup>lt;sup>1</sup> This guidance has been prepared by the Office of Clinical Pharmacology in the Office of Translational Sciences in collaboration with the Labeling Policy Team in the Office of New Drugs, in the Center for Drug Evaluation and Research (CDER), and the Center for Biologics Evaluation and Research (CBER) at the Food and Drug Administration (FDA).

<sup>&</sup>lt;sup>2</sup> This guidance applies to drugs, including biological products that are regulated as drugs. For the purpose of this guidance, references to *drugs* include drugs approved under section 505 of the Federal Food, Drug, and Cosmetic Act (FD&C Act) (21 U.S.C. 355) and biological products licensed under section 351 of the Public Health Service Act (PHS Act) (42 U.S.C. 262).

<sup>&</sup>lt;sup>4</sup> This is one of many guidance documents addressing labeling for human prescription drugs. For additional human prescription drug labeling guidance documents, see the FDA's Labeling Resources for Human Prescription Drugs website (available at https://www.fda.gov/drugs/laws-acts-and-rules/fdas-labeling-resources-human-prescription-drugs) and the Prescribing Information Resources website (available at https://www.fda.gov/drugs/fdas-labeling-resources-human-prescription-drugs/prescribing-information-resources).

Draft – Not for Implementation

28	PHS Act, and when revising existing information in the labeling for a currently approved drug in
29	a supplement to such applications. <sup>5</sup>
30	
31	Sections III and VI of this guidance provide examples (denoted with a sawtooth line in the left
32	margin) of the content and format of DI information in the Full Prescribing Information and
33	Highlights of Prescribing Information (Highlights), respectively, involving a fictitious subject
34	drug <sup>6</sup> (e.g., DRUG-X (drugozide-x)) and concomitant (i.e., other) drugs (e.g., drugofen-a,
35	drugofen-b, drugofen-c). Section IX of this guidance (the Appendix) provides additional
36	examples of the content and format of DI information throughout the Prescribing Information.
37	
38	This guidance does not address methodological considerations for evaluating or interpreting DIs
39	during drug development or after drug approval. Recommendations for evaluating the DI
40	potential during drug development are included in an FDA guidance for industry. <sup>7</sup>
41	
42	When finalized, Section VI.A. of this guidance will supersede DI labeling-specific
43	recommendations for the Highlights in the FDA guidance for industry Labeling for Human
44	Prescription Drug and Biological Products – Implementing the PLR Content and Format
45	Requirements (February 2013). <sup>8</sup>
46	
47	In general, FDA's guidance documents do not establish legally enforceable responsibilities.
48	Instead, guidances describe the Agency's current thinking on a topic and should be viewed only
49	as recommendations, unless specific regulatory or statutory requirements are cited. The use of
50	the word <i>should</i> in Agency guidances means that something is suggested or recommended, but
51	not required.
52	-
53	

#### 54

#### II. BACKGROUND 55

56 Prescription drug labeling must contain a summary of the essential information necessary for safe and effective use of the drug.<sup>9</sup> Prescription drug labeling is a primary tool to communicate 57

<sup>9</sup> 21 CFR 201.56(a)(1).

<sup>&</sup>lt;sup>5</sup> See generally, 21 CFR parts 314 and 601.

<sup>&</sup>lt;sup>6</sup> For this guidance, the term *subject drug* refers to the drug for which the labeling is being developed.

<sup>&</sup>lt;sup>7</sup> See the FDA guidance for industry M12 Drug Interaction Studies (August 2024). We update guidances periodically. For the most recent version of a guidance, check the FDA guidance web page at https://www.fda.gov/regulatory-information/search-fda-guidance-documents.

<sup>&</sup>lt;sup>8</sup> Specifically, this guidance, when finalized, will supersede the following recommendation in section V.B.7. HIGHLIGHTS, Information in Highlights, Dosage and Administration (§ 201.57(a)(7)) of the guidance for industry Labeling for Human Prescription Drug and Biological Products – Implementing the PLR Content and Format Requirements, "Information under the Dosage and Administration heading [contains] ... other clinically significant clinical pharmacology information that affects dosing recommendations (e.g., dosing modifications recommended for concomitant therapy ...)".

Draft – Not for Implementation

DI information to HCPs. Effective communication of DI information in the labeling informs 58 optimal use of the drug and the HCP's clinical decision-making (e.g., prescribing decisions or 59 management instructions). 60 61 In this guidance, we use the term *drug interacting class* to mean a group of drugs and/or foods 62 that all share a specific characteristic that is relevant to a clinically significant DI (e.g., all 63 members of the class have in common a particular effect on drug metabolism).<sup>10</sup> In the case of 64 drugs, the shared characteristic that identifies the drug interacting class may be unrelated to the 65 drug's therapeutic class.<sup>11</sup> 66 67 DI information in the labeling must be accurate and must be updated when new information 68 becomes available that causes the labeling to be inaccurate, false, or misleading.<sup>12</sup> Applicants 69 should review DI information in the labeling at least annually to ensure it is accurate and 70 contains up-to-date information.<sup>13</sup> 71 72 73 III. CONTENT AND FORMAT OF THE DRUG INTERACTIONS SECTION 74 75 A. **Overview of the DRUG INTERACTIONS Section** 76 77 78 The DRUG INTERACTIONS section must describe clinically significant DIs, either observed or 79 predicted, with other prescription or over-the-counter drugs, classes of drugs, or foods (e.g., dietary supplements, grapefruit juice).<sup>14,15</sup> The primary focus of the description of the clinically 80 significant DI and its prevention or management instructions in this section should be the subject 81 drug (i.e., how the subject drug is affected by other drugs or foods or how the subject drug 82 affects other drugs). This section: 83 84 Must include specific practical instructions for preventing or managing clinically 85

•

86

significant DIs<sup>16</sup> (see section III.B.1 of this guidance)

<sup>12</sup> 21 CFR 201.56(a)(2).

<sup>13</sup> See the FDA guidance for industry Labeling for Human Prescription Drug and Biological Products – Implementing the PLR Content and Format Requirements (February 2013).

<sup>14</sup> 21 CFR 201.57(c)(8)(i).

<sup>16</sup> 21 CFR 201.57(c)(8)(i).

<sup>&</sup>lt;sup>10</sup> For example, the strong cytochrome P450 3A4 (CYP3A4) inhibitor drug interacting class includes a food (grapefruit juice) as well as several drugs, including boceprevir, ceritinib, clarithromycin, and cobicistat.

<sup>&</sup>lt;sup>11</sup> For example, fluconazole (an anti-fungal), fluoxetine (an anti-depressant), and ticlopidine (an anti-platelet drug) are all strong CYP2C19 inhibitors, a drug interacting class that is relevant to their DI, but they are in different, unrelated classes with respect to their therapeutic uses.

<sup>&</sup>lt;sup>15</sup> See the FDA guidance for industry M12 Drug Interaction Studies (August 2024).

Draft – Not for Implementation

87	
88	• Must briefly describe the mechanism of clinically significant DIs, if known <sup>17</sup> (see section
89	III.B.2 of this guidance)
90	
91	• Should include the clinical effects of clinically significant DIs <sup>18</sup> (see section III.B.3 of
92	this guidance).
93	
94	DIs that are described in the CONTRAINDICATIONS and/or WARNINGS AND
95	PRECAUTIONS sections must be discussed in more detail in the DRUG INTERACTIONS
96	section. <sup>19</sup>
97	
98	Practical guidance on known interference of the drug with laboratory tests must also be included
99	in the DRUG INTERACTIONS section <sup>20</sup> (see section III.D of this guidance).
100	Cross references should be used to reduce reduce so findemarking if restinget DL information
101 102	Cross-references should be used to reduce redundancy of information if pertinent DI information is presented in more than one section of labeling. <sup>21</sup>
102	is presented in more than one section of fabering.
103	The entire DRUG INTERACTIONS section or required content within this section must be
104	omitted from the Full Prescribing Information (FPI) if it is clearly inapplicable, <sup>22</sup> such as if there
105	are no clinically significant DIs and it is not critical to communicate the absence of a clinically
107	significant DI (see section III.C. of this guidance).
108	6 ( 6 )
109	B. Communicating a Clinically Significant DI
110	
111	Information about clinically significant DIs should be communicated in the DRUG
112	INTERACTIONS section in a manner that is understandable and clinically informative to HCPs,
113	including those with limited clinical pharmacology expertise. Descriptions of DIs should
114	generally contain information presented in the following order to promote consistency, as
115	applicable: (1) instructions for preventing or managing the clinically significant DIs, (2)

mechanisms of the clinically significant DIs, and (3) clinical effects of the clinically significant

117 DIs. This labeling approach prioritizes the information that is most actionable and may impact

<sup>19</sup> 21 CFR 201.57(c)(8)(i).

<sup>20</sup> 21 CFR 201.57(c)(8)(ii).

<sup>21</sup> See the FDA guidance for industry Labeling for Human Prescription Drug and Biological Products — Implementing the PLR Content and Format Requirements (February 2013).

 $^{22}$  21 CFR 201.56(d)(4). There may be situations when it is critical to communicate the absence of a clinically significant DI in this section (see section III.C. of this guidance).

<sup>&</sup>lt;sup>17</sup> 21 CFR 201.57(c)(8)(i).

<sup>&</sup>lt;sup>18</sup> Clinical effects should be derived from the totality of evidence (e.g., clinical studies, safety analyses, exposureresponse data, exposure-safety data, modeling, and simulation). See the FDA guidance for industry *M12 Drug Interaction Studies* (August 2024).

Draft – Not for Implementation

118	the HCP's clinical decision-making.	
119		
120	1. Instructions for Preventing or Managing DIs	
121		
122	Instructions to prevent or manage clinically significant DIs in the DRUG INTERACTIONS	
123	section must be accurate, <sup>23</sup> specific, and practical <sup>24</sup> and should be actionable for the HCP. For	
124	example, a prevention or management recommendation for a clinically significant DI of the	
125	subject drug with warfarin that describes a specific change in the frequency or timing of	
126	international normalized ratio (INR) monitoring is more informative for HCPs than a non-	
127	specific recommendation such as "monitor INR" that reflects standard clinical practice for	
128	patients taking warfarin. Applicants should use specific statements rather than vague or	
129	ambiguous statements (e.g., "avoid concomitant use" is preferred over "use with caution,"	
130	"reduce dosage" is preferred over "adjust dosage") and use active voice instead of passive voice.	
131		
132	Prevention or management instructions presented in the DRUG INTERACTIONS section may	
133	include, but are not limited to, the following:	
134		
135	• Concomitant use is contraindicated: Contraindicate concomitant use because the risk	
136	of use clearly outweighs any possible therapeutic benefits. <sup>25</sup> For example, the DRUG	
137	INTERACTIONS section would state:	
138		
139	"Concomitant use of DRUG-X with drugofen-a is contraindicated [see	
140	Contraindications (4)]."	
141		
142	• Avoid concomitant use: Concomitant use is generally inadvisable but does not rise to	
143	the level of a contraindication. For example, the DRUG INTERACTIONS section would	
144	state:	
145		
146	*Avoid concomitant use of DRUG-X with drugofen-a."	
147		
148	When concomitant use is generally unavoidable (e.g., when the concomitant drug is	
149	indicated for the treatment of a serious or life-threatening condition or disease), consider	
150	providing recommendation(s), when possible, for actionable measures that can be taken	
151	to prevent or manage the DI. For example, the DRUG INTERACTIONS section would	
152	state:	
153		
154	"Avoid concomitant use of DRUG-X with drugofen-a. If concomitant use is	
155	unavoidable, obtain ECGs prior to initiating, during concomitant use, and	

<sup>23</sup> 21 CFR 201.56(a)(2).

<sup>24</sup> 21 CFR 201.57(c)(8)(i).

<sup>&</sup>lt;sup>25</sup> 21 CFR 201.57(c)(5); also see the FDA guidance for industry *Warnings and Precautions, Contraindications, and Boxed Warning Sections of Labeling for Human Prescription Drug and Biological Products – Content and Format* (October 2011).

Draft – Not for Implementation

156	additionally as clinically indicated."
157	
	• Modify dosage/administration: Concomitant use necessitates a dosage or
159	administration modification (e.g., increase dosage, reduce dosing frequency, stagger
160	administration, temporarily discontinue one drug) of either the subject drug (i.e., DRUG-
161	X) or concomitant drug(s) or drugs within a drug interacting class (e.g., strong CYP3A4
162	inhibitors, CYP2C8 substrates).
163	
164	• Modify dosage/administration of the subject drug: If there are dosage
165	modifications for the subject drug for DIs, the:
166	
167	<ul> <li>DOSAGE AND ADMINISTRATION section must include this information, as</li> </ul>
168	appropriate. <sup>26</sup> More specifically, when there is sufficient information to support
169	specific recommendations to modify the dosage or administration of the subject
170	drug to reduce the risk of a DI, these recommendations should be included in the
171	DOSAGE AND ADMINISTRATION section and cross-reference to the DRUG
172	INTERACTIONS section. <sup>27</sup>
173	
174	<ul> <li>DRUG INTERACTIONS section should identify when a dosage or administration</li> </ul>
175	modification for the subject drug is recommended and cross-reference to the
176	details regarding the dosage or administration modification in the DOSAGE AND
177	ADMINISTRATION section.
178	
179	For example:
180	
181	2 DOSAGE AND ADMINISTRATION
182	
183	Reduce the dosage of DRUG-X from 200 mg once daily to 100 mg once
184	daily when used concomitantly with a strong CYP3A inhibitor <i>[see Drug</i>
185	Interactions (7.x)].
186	
187	7 DRUG INTERACTIONS
188	§
189	Reduce the dosage of DRUG-X when used concomitantly with a strong
190	CYP3A inhibitor [see Dosage and Administration (2.x)].
191	
192	• Modify dosage/administration of the concomitant drug: The DRUG
193	INTERACTIONS section should identify when a dosage or administration
194	modification for the concomitant drug is recommended, if applicable, and may
195	reference the concomitant drug's labeling for the relevant DI. For example, this
196	section would state:

<sup>26</sup> 21 CFR 201.57(c)(3)(i)(H).

<sup>&</sup>lt;sup>27</sup> See the FDA draft guidance for industry *Dosage and Administration Section of Labeling for Human Prescription Drug and Biological Products – Content and Format* (January 2023). When final, this guidance will represent the Agency's current thinking on this topic.

105	
197	
198	"Reduce the dosage of drugofen-a when used concomitantly with DRUG-X (see
199	drugofen-a's Prescribing Information)."
200	
201	In this situation, no cross-reference to the DOSAGE AND ADMINISTRATION
202	section is needed because the DOSAGE AND ADMINISTRATION section should
203	not include the dosage or administration modification for the concomitant drug.
204	
205	• Monitor: Concomitant use necessitates additional or increased frequency of monitoring
206	of specific clinical parameters. For example, the DRUG INTERACTIONS section would
207	state:
207	
208	"Monitor liver enzymes weekly for the first four weeks and then monthly when
209	DRUG-X is used concomitantly with drugofen-a <i>[see Warnings and Precautions</i>
210	(5.x)]."
	$\langle (J, x) \rangle$ .
212	$2 \qquad M_{\rm ext} = 1 \qquad (1 $
213	2. Mechanism of the Clinically Significant DI
214	
215	The mechanism of the clinically significant DI, if known, must be briefly described in the DRUG
216	INTERACTIONS section. <sup>28</sup> A clinically significant DI can be the result of pharmacokinetic
217	(PK) and/or pharmacodynamic (PD) changes.
218	
219	• For PK metabolism- (e.g., cytochrome P450) and transporter-based interactions, the
220	subject drug should be identified as an inhibitor, inducer, or substrate. Additionally, the
221	change in drug exposure <sup>29</sup> should be briefly summarized (e.g., increases drugozide-x
222	exposure, decreases drugozide-x exposure), with a cross-reference to the supporting DI
223	information in the <i>Pharmacokinetics</i> subsection in the CLINICAL PHARMACOLOGY
224	section. For example, the DRUG INTERACTIONS section would state:
225	
226	<sup>2</sup> "Drugozide-x is a CYP3A substrate. Strong CYP3A inhibitors increase
227	drugozide-x exposure [see Clinical Pharmacology (12.3)]."
228	
229	• For PD-based interactions, the nature of the PD effects should be described. For example,
230	the DRUG INTERACTIONS section would state:
230	the DROG HVIER REPORTS section would state.
231	*Both drugozide-x and non-selective MAO inhibitors inhibit catecholamine
233	metabolism."
234	2 Clinical Effects of the Clinically Similarity DI
235	3. Clinical Effects of the Clinically Significant DI
236	
237	The clinical effects of a clinically significant DI should be stated in the DRUG INTERACTIONS
238	section. Describing the changes in PD and PK parameters alone is generally insufficient to

<sup>&</sup>lt;sup>28</sup> 21 CFR 201.57(c)(8)(i).

<sup>&</sup>lt;sup>29</sup> Exposure includes drug concentration, C<sub>max</sub>, and AUC, as applicable.

239 240 241 242 243 244	communicate the clinical effects of a DI on the safety or effectiveness of the drug. For example, with a PK-based DI, an exposure change for one drug may result in a different clinical effect, based on its exposure-response relationship, compared to another drug with the same exposure change. The following approaches to communicate clinical effects are recommended in this section:
245 246 247 248	• When data are sufficient to support a clinical effect statement in specific terms, the description of the clinical effects should be specific. For example, the DRUG INTERACTIONS section would state:
249 250 251	"The concomitant use of DRUG-X with drugofen-a may increase the risk of bleeding [see Clinical Pharmacology (12.2)]."
252 253 254 255	• When data are not sufficient to support a clinical effect statement in specific terms, the clinical effects should generally be described in broad terms. For example, the DRUG INTERACTIONS section would state:
256 257 258	"The concomitant use of DRUG-X with drugofen-a may increase the risk of DRUG-X-associated adverse reactions"
259 260 261 262	or "The concomitant use of DRUG-X with drugofen-b may reduce effectiveness of DRUG-X."
263 264 265 266	4. Drug Interacting Classes and Examples of Drugs Within Drug Interacting Classes
267 268 269 270 271	When there are clinically significant DIs of the subject drug with all drugs within a drug interacting class, <sup>30</sup> the FDA recommends that applicants identify only the drug interacting class and avoid naming the drugs within the drug interacting class in the DRUG INTERACTIONS section. <sup>31</sup> In this situation, reasons that the FDA generally recommends not naming examples of drugs within the drug interacting class in this section include the following:
272 273 274 275 276 277	• If examples of individual drugs within a drug interacting class are included in labeling, those examples may become less relevant over time (e.g., new drugs in the drug interacting class may be approved, or selected examples of drugs in the drug interacting class may no longer be commonly used in clinical practice or may no longer be available because they have been withdrawn from the market).

<sup>&</sup>lt;sup>30</sup> An example of this situation is when a clinical study demonstrates a clinically significant DI of DRUG-X with one member of a drug interacting class, and the results of the study can be applied to all the other drugs in the drug interacting class.

 $<sup>^{31}</sup>$  If a food (e.g., dietary supplements, grapefruit juice) is in a drug interacting class, the food must be listed separately, in addition to the drug interacting class in the DRUG INTERACTIONS section. See 21 CFR 201.57(c)(8)(i)).

- HCPs can reference publicly available resources to determine which drugs are within a 278 • drug interacting class. 279 280 The FDA generally recommends that applicants identify only the drug interacting class in the 281 DRUG INTERACTIONS section. However, this section should name the drugs within the drug 282 interacting class if concomitant use of the subject drug with drugs within the drug interacting 283 class (e.g., drugofen-a, drugofen-b, drugofen-c) has different clinical effects or prevention and 284 management instructions (e.g., "concomitant use of DRUG-X with drugofen-a is 285 contraindicated," "avoid concomitant use of DRUG-X with drugofen-b," "reduce the DRUG-X 286 dosage when used concomitantly with drugofen-c"). In these situations, this section should list 287 288 the individual interacting drugs with their different clinical effects or their respective prevention and management instructions, respectively. 289 290 If some, but not all, of the drugs in a drug interacting class have a clinically significant 291 interaction with the subject drug, then only individual drugs with the clinically significant 292 interaction should be identified in this section. In this situation, the class of drugs and the drugs 293 294 without the clinically significant interaction should not be named in this section. 295 When there are clinically significant DIs of the subject drug with all drugs within a drug 296 297 interacting class (with the same prevention and management instructions and the same clinical effects), but the applicant believes that it is essential to identify specific drugs within a drug 298 interacting class in this section, the FDA recommends that the applicant provide justification and 299 consult the corresponding review division. 300 301 Clinically significant DIs involving CYP- or transporter system-based drug interacting classes 302 are very common. One resource that HCPs can reference regarding these drug interacting classes 303 is an FDA website that lists examples of clinical substrates, inhibitors, and inducers of CYP 304 enzymes and substrates and inhibitors of transporters.<sup>32</sup> This FDA website allows HCPs to view 305 which drugs or foods are within a specific CYP- or transporter-based drug interacting class. 306 When there are clinically significant DIs of the subject drug with all drugs in a CYP- or 307 transporter-based drug interacting class, the FDA recommends that in addition to identifying the 308 drug interacting class and avoiding naming individual drugs within the drug interacting class, 309 applicants consider referring to the FDA's website with examples of drugs and foods within the 310 CYP- and transporter-based drug interacting class. 311 312 313 5. Therapeutic Proteins That Reduce Proinflammatory Cytokines in Diseases or Conditions Associated With Elevated Cytokine Levels 314
- 315
- Certain diseases or conditions are associated with elevated cytokine levels leading to reduced 316
- CYP enzyme expression. Therapeutic proteins that reduce the level of pro-inflammatory 317

<sup>&</sup>lt;sup>32</sup> The FDA website www.fda.gov/CYPandTransporterInteractingDrugs provides examples of interacting drugs and foods within CYP-based metabolic- and transporter system-based drug interacting classes, and is evaluated, compiled, and routinely updated by the FDA. The field of metabolic and transporter pharmacology is evolving; thus, the examples on this website are a guide and not considered a comprehensive list of all possible drugs and foods that fit these CYP- and transporter system-based drug interacting classes.

<ul> <li>318</li> <li>319</li> <li>320</li> <li>321</li> <li>322</li> <li>323</li> </ul>	cytokines in these situations can increase expression of these CYP enzymes. <sup>33</sup> This increased expression results in a decreased CYP substrate exposure, which may reduce effectiveness of CYP substrates. <sup>34</sup> Therefore, the FDA recommends that the DRUG INTERACTIONS section for these therapeutic proteins include the following language or similar language under the heading <u>Certain CYP Substrates</u> .
324 325	The following fictitious labeling example is for the therapeutic protein DRUG-X (drugimab- abxd): <sup>35</sup>
326 327	7.x Effects of DRUG-X on Other Drugs
328	<
329	Certain CYP Substrates
330	For CYP substrates where minimal:
331	
332	• Decreases in the concentration may reduce CYP substrate effectiveness,
333	monitor for reduced effectiveness of the CYP substrate upon DRUG-X
334	initiation.
335	• Increases in the concentration may increase CYP substrate adverse reactions,
336	monitor for increased adverse reactions of the CYP substrate after DRUG-X
337	discontinuation.
338	
339	Increased concentrations of cytokines (e.g., IL-1, IL-6, IL-10, TNFα, IFN) during
340	chronic inflammation associated with certain diseases including <i>[insert diseases or</i>
341	conditions that the drug is approved to treat in which this statement applies] may
342	suppress the formation of CYP enzymes. Therapeutic proteins, including drugimab-
343	abxd, that decrease the concentrations of these pro-inflammatory cytokines may
344	increase the formation of CYP enzymes resulting in decreased CYP substrate exposure.
345	
346	If the potential for a clinically significant DI with the use of a therapeutic protein is low, an
347	applicant can propose to revise or exclude such language in this section of labeling. <sup>36</sup>
348	
349	C. Communicating the Absence of a Clinically Significant DI
350	
351	Generally, the FDA does not recommend that the DRUG INTERACTIONS section describe the
352	absence of a DI. However, in the situations as described below, it may be critical to
353	communicate the absence of a clinically significant DI. If an applicant proposes to include
354	information on the absence of a clinically significant DI in this section, the FDA recommends the

<sup>&</sup>lt;sup>33</sup> See the FDA guidance for industry Drug-Drug Interaction Assessment for Therapeutic Proteins (June 2023).

<sup>&</sup>lt;sup>34</sup> See the FDA guidance for industry Drug-Drug Interaction Assessment for Therapeutic Proteins (June 2023).

<sup>&</sup>lt;sup>35</sup> If there are sufficient data demonstrating that the concentrations of only a few cytokines are increased during chronic inflammation associated with the diseases/conditions that the drug is approved to treat, only such cytokines should be listed.

<sup>&</sup>lt;sup>36</sup> See the FDA guidance for industry Drug-Drug Interaction Assessment for Therapeutic Proteins (June 2023).

Draft – Not for Implementation

355	applicant pr	rovide a justification.
356 357 358 250		ecommends communicating the absence of a clinically significant DI in the DRUG ΓΙΟΝS section in the following two situations.
359 360 361 362	stro	RUG-X has clinically significant DIs with all drugs in a drug interacting class (e.g., ng CYP3A inhibitors) except for one drug (e.g., drugofen-a) in this class, this eption should be described in this section of labeling. For example:
363 364	<	7.x Effects of Other Drugs on DRUG-X
365	<	The Effects of Other Drugs on Dico G A
366	<	Strong CYP3A Inhibitors
367	<	Reduce the DRUG-X dosage when used concomitantly with strong CYP3A
368	<	inhibitors [see Dosage and Administration (2.x)], except with drugofen-a. No
369	<	dosage modification is recommended for DRUG-X when used concomitantly with
370	<	drugofen-a.
371	<	
372	<	Drugozide-x is a CYP3A substrate. Strong CYP3A inhibitors increase drugozide-x
373	<	exposure, which may increase the risk of DRUG-X-associated adverse reactions.
374	<	Although drugofen-a is a strong CYP3A inhibitor, the interaction with DRUG-X is
375	<	not clinically significant [see Clinical Pharmacology (12.3)].
376		
377		drug class (e.g., tyrosine kinase inhibitors) is known to have a clinically significant
378		raction with a drug (e.g., drugofen-b); however, the subject drug (e.g., DRUG-X), a
379		nber of that class, does not interact with that concomitant drug (e.g., drugofen-b), this
380	exce	eption should be described in this section of labeling. For example:
381	<u>\</u>	
382	2	7.x Absence of Clinically Significant Interaction with Drugofen-b
383	Ś	
384	$\leq$	No dosage modification is recommended for DRUG-X when used concomitantly
385	3	with drugofen-b. Although it is a tyrosine kinase inhibitor, DRUG-X does not have a
386	>	clinically significant interaction with drugofen-b [see Clinical Pharmacology
387	>	(12.3)].
388	Л	Communicating a Dung Interference with I abountary Tests
389	D.	Communicating a Drug Interference with Laboratory Tests
390 201	The DDUC	NITER ACTIONS section must contain practical guidence on known interference of
391		INTERACTIONS section must contain practical guidance on known interference of

the drug with laboratory tests.<sup>37</sup> When the drug interferes with a laboratory test, it can cause an inaccurate test result. A clinically significant drug-test interference should be included in this section when an erroneous test result would negatively affect clinical decision-making (e.g., false

<sup>&</sup>lt;sup>37</sup> 21 CFR 201.57(c)(8)(ii).

Draft – Not for Implementation

positive hemoccult test, false negative HIV test).<sup>38</sup> Accurate test results reflecting changes in a 395 PD parameter caused by the drug are not considered a laboratory test interference and should not 396 be included in the DRUG INTERACTIONS section.<sup>39</sup> 397 398 This section should provide instructions to prevent or manage the interference and the clinical 399 effect(s) of the interference, if feasible. Additionally, the WARNINGS AND PRECAUTIONS 400 section must briefly describe the drug interference with laboratory tests and cross-reference to 401 the DRUG INTERACTIONS section for more details.<sup>40</sup> For example: 402 403 7.x Interference of DRUG-X with Platelet Tests 404 When performing platelet tests in DRUG-X-treated patients, run blood samples within 4 405 hours of blood collection or collect blood samples in tubes containing citrate. 406 407 Drugozide-x interferes with automated platelet counts (platelet clumping), in particular 408 when blood samples are collected in tubes containing ethylenediaminetetraacetic acid 409 (EDTA), which may lead to unevaluable or falsely decreased platelet counts *[see* 410 Warnings and Precautions (5.x)]. 411 412 If there is drug interference with two or more laboratory tests, the FDA generally recommends 413 including these drug interferences with laboratory tests under one subsection entitled 7.x 414 Interference of DRUG-X with Laboratory Tests in the DRUG INTERACTIONS section with 415 appropriate headings (e.g., Interference of DRUG-X with Lab Test-A, Interference of DRUG-X 416 with Lab Test-B). 417 418 E. 419 **Organization and Formatting of the DRUG INTERACTIONS Section** 420 Information in the DRUG INTERACTIONS section should generally be placed into subsections 421 to enhance the organization, presentation, and accessibility of information (e.g., 7.1 Effects of 422 **Other Drugs on DRUG-X**).<sup>41</sup> Subsections should be ordered to reflect the content's importance 423 and relative public health significance. Subsection headings should accurately reflect the content 424 425 of the subsection. The FDA recommends placing all information under subsections instead of 426 inserting information between the section heading and first subsection heading (i.e., capture information under numbered subsections instead of between the section 7 heading and subsection 427

- 27 information under numbered subsections instead of between the section 7 heading and subsection 28, 7.1). Electing content will not be associated with a specific subsection bodding in Full
- 7.1). Floating content will not be associated with a specific subsection heading in Full

<sup>40</sup> 21 CFR 201.57(c)(6)(iv).

<sup>41</sup> See 21 CFR 201.56(d)(2).

<sup>&</sup>lt;sup>38</sup> See section II.B.1. in the FDA guidance for industry *Warnings and Precautions, Contraindications, and Boxed Warning Sections of Labeling for Human Prescription Drug and Biological Products – Content and Format* (October 2011).

<sup>&</sup>lt;sup>39</sup> Changes in PD parameters are included in other sections of labeling (e.g., WARNINGS AND PRECAUTIONS, ADVERSE REACTIONS, CLINICAL PHARMACOLOGY).

429	Prescribing Information: Contents <sup>42</sup> and may therefore be less accessible. <sup>43</sup>
430	
431	A typical approach to including PK-based DIs in this section is to incorporate such information
432	into one of two subsections: 7.1 Effects of Other Drugs on DRUG-X or 7.2 Effects of DRUG-
433	X on Other Drugs. For complex PK-based DI scenarios (e.g., DRUG-X is affected by and has
434	an effect on the concomitant drug), DI information should be included under both subsections
435	(e.g., 7.1 Effects of Other Drugs on DRUG-X and 7.2 Effects of DRUG-X on Other Drugs) in
436	order to accurately describe both DIs. PD-related DIs should generally be presented in separate
437	subsection(s) with a title specific to the interacting drug or drug interacting class, as applicable.
438	If there are clinically significant DIs with the subject drug that combine two or more
439	mechanisms, the FDA recommends that the heading that describes such information in the
440	DRUG INTERACTIONS section include all the mechanisms (e.g., Combined P-gp and
441	Moderate CYP3A Inhibitors). This approach should also be used for scenarios involving one or
442	more DI mechanisms in a specific population (e.g., Combined P-gp and Moderate CYP3A
443	Inhibitors in Patients with Renal Impairment).
444	
445	The FDA recommends that applicants select a format that will most effectively communicate DI
446	information in this section. Different formats could be warranted depending on the number,
447	complexity, and type of clinically significant DIs included in this section. For example, complex
448	or extensive information (e.g., three or more DIs) could be more effectively conveyed in a table
449	rather than in text. When referring to tables in this section, a statement preceding the table should
450	be included that describes the content in the table. For example:
451	
452	$\lesssim$ "Table X describes clinically significant DIs where concomitant use of another drug
453	s affects DRUG-X."
454	
455	Refer to the Appendix for an example of the content and format of DI information in the
456	Highlights and the content and format of the DRUG INTERACTIONS section, as well as other
457	sections of the FPI (i.e., DOSAGE AND ADMINISTRATION, CONTRAINDICATIONS,
458	WARNINGS AND PRECAUTIONS, CLINICAL PHARMACOLOGY, PATIENT
459	COUNSELING INFORMATION) that may contain DI information.
460	
461	
462	IV. CONTENT NOT INCLUDED IN THE DRUG INTERACTIONS SECTION
463	
464	Generally, the DRUG INTERACTIONS section should not describe DIs that are not clinically
465	significant, unless it is important to communicate the absence of a clinically significant DI (see
466	Section III.C of this guidance).
467	
468	In vitro and/or animal data alone should not be included in this section because they are
469	generally insufficient to justify the presence of a clinically significant DI. If necessary, applicants
470	should consult with the FDA regarding the inclusion of DIs based only on in vitro and/or animal

<sup>&</sup>lt;sup>42</sup> See 21 CFR 201.57(b).

<sup>&</sup>lt;sup>43</sup> If labeling has floating content between the section 7 heading and subsection 7.1, the FDA recommends that applicants move the floating content to the appropriate subsection(s) in the DRUG INTERACTIONS section.

Draft – Not for Implementation

471	data in this section.
472 473 474 475 476 477	To minimize redundancy, the DRUG INTERACTIONS section must not repeat details of DI PK studies (e.g., magnitude of exposure change) that are included in the CLINICAL PHARMACOLOGY section. <sup>44</sup> Instead, a cross-reference to the CLINICAL PHARMACOLOGY section should be provided.
478 479 480 481 482 483	If there is a recommendation to modify the dosage or administration of the subject drug, to minimize redundancy, the FDA recommends that detailed instructions of the dosage or administration modification for the subject drug be included in the DOSAGE AND ADMINISTRATION section and not in the DRUG INTERACTIONS section (see Section III.B.1 of this guidance).
483 484 485 486 487 488 488 489	The reduction of immunological response to a vaccine by an immunosuppressive drug is not considered a true DI; therefore, this type of vaccine information should generally be included in the WARNINGS AND PRECAUTIONS section (as well as the <i>Pharmacodynamics</i> subsection in the CLINICAL PHARMACOLOGY section, as appropriate) instead of the DRUG INTERACTIONS section.
489 490 491 492 493 494 495	Drug incompatibilities (e.g., unwanted physical and chemical reactions that occur between two or more drugs or between a drug and a diluent when combined in the same container) are not considered DIs. Therefore, this information should not appear in the DRUG INTERACTIONS section. <sup>45</sup>
496 497 498	V. DI CONTENT IN OTHER SECTIONS OF THE FULL PRESCRIBING INFORMATION
499 500 501	In addition to the DRUG INTERACTIONS section, required and recommended DI information is included in other sections of the FPI, as applicable.
502 503 504 505	• BOXED WARNING: The FDA may require a boxed warning for certain contraindications or serious warnings, particularly those that may lead to death or serious injury, resulting from a DI. <sup>46</sup>
505 506	• DOSAGE AND ADMINISTRATION: This section must describe dosage modifications

<sup>46</sup> 21 CFR 201.57(c)(1).

<sup>&</sup>lt;sup>44</sup> 21 CFR 201.57(c)(8)(i); see also the FDA guidance for industry *Clinical Pharmacology Section of Labeling for Human Prescription Drug and Biological Products – Content and Format* (December 2016).

<sup>&</sup>lt;sup>45</sup> The DOSAGE AND ADMINISTRATION section must contain "essential information on drug incompatibilities if the drug is mixed in vitro with other drugs or diluents." 21 CFR 201.57(c)(3)(iv).

Draft – Not for Implementation

507 508 509 510 511 512 513 514 515 516 517 518	needed because of DIs. <sup>47</sup> More specifically, when there is sufficient information to support specific recommendations to modify the dosage or administration of the subject drug to reduce the risk of a DI, the specific recommendations should be included in this section. The DOSAGE AND ADMINISTRATION section should also describe administration modifications for the subject drug due to DIs (e.g., alteration of the timing of a dose of the subject drug relative to dosing of the concomitant drug) and cross-reference the DRUG INTERACTIONS section for more detailed DI information (see sections III.A. and III.B. in this guidance). When there is not enough information to support a specific dosage or administration modification for the subject drug, the DI should ordinarily not be discussed in the DOSAGE AND ADMINISTRATION section. <sup>48</sup>
519 •	CONTRAINDICATIONS: This section must list drugs that are contraindicated because
520	the risk from concomitant use with the subject drug clearly outweighs any possible
521	therapeutic benefit. <sup>49</sup> The CONTRAINDICATIONS section should cross-reference to
522	more detailed DI information in the DRUG INTERACTIONS section and other sections
523	of the labeling as appropriate (e.g., WARNINGS AND PRECAUTIONS). <sup>50</sup>
524	
525 •	WARNINGS AND PRECAUTIONS: This section must describe clinically significant
526	adverse reactions or other potential safety hazards resulting from a DI. <sup>51</sup> Rather than
527	repeating the DIs from the DRUG INTERACTIONS section in the WARNINGS AND
528	PRECAUTIONS section, generally only the most clinically significant DIs (e.g., those
529	that lead to treatment failure, drug resistance, serious safety issues), if any, should be
530	included in the WARNINGS AND PRECAUTIONS section. The WARNINGS AND
531	PRECAUTIONS section should include additional details about the clinical effects of
532	those clinically significant DIs (e.g., severity, outcomes), and should include a brief
533	description of the prevention or management instructions with a cross-reference to more
534	detailed DI information elsewhere in the labeling <sup>52</sup> (e.g., DOSAGE AND
535	ADMINISTRATION, DRUG INTERACTIONS, CLINICAL PHARMACOLOGY
536	sections). The WARNINGS AND PRECAUTIONS section must also briefly note

<sup>47</sup> 21 CFR 201.57(c)(3)(i)(H).

<sup>48</sup> See the FDA draft guidance for industry *Dosage and Administration Section of Labeling for Human Prescription Drug and Biological Products – Content and Format* (January 2023). When final, this guidance will represent the Agency's current thinking on this topic.

<sup>49</sup> 21 CFR 201.57(c)(5). See also the FDA guidance for industry *Warnings and Precautions, Contraindications, and Boxed Warning Sections of Labeling for Human Prescription Drug and Biological Products – Content and Format* (October 2011).

<sup>50</sup> See the FDA guidance for industry *Warnings and Precautions, Contraindications, and Boxed Warning Sections of Labeling for Human Prescription Drug and Biological Products – Content and Format* (October 2011).

<sup>51</sup> 21 CFR 201.57(c)(6).

<sup>52</sup> See the FDA guidance for industry Warnings and Precautions, Contraindications, and Boxed Warning Sections of Labeling for Human Prescription Drug and Biological Products – Content and Format (October 2011).

Draft – Not for Implementation

537	information on any known interference by the drug with laboratory tests and cross-
538	reference the DRUG INTERACTIONS section <sup>53</sup> (see section III.D of this guidance).
539	
540 <b>•</b>	CLINICAL PHARMACOLOGY: This section must include information relating to the
541	human clinical pharmacology and actions of the drug. <sup>54</sup> It should also include relevant
542	details about study results from DI studies if essential to understand dosing or DI
543	information presented in other sections of the labeling (e.g., DOSAGE AND
544	ADMINISTRATION, DRUG INTERACTIONS sections). <sup>55</sup> Both positive and pertinent
545	negative results from clinical studies conducted to evaluate DIs should be included under
546	the Drug Interaction Studies heading in the Pharmacokinetics subsection in the
547	CLINICAL PHARMACOLOGY section. <sup>56</sup> If clinical DI studies have not been
548	conducted or are inconclusive, then pertinent negative and/or positive results from in
549	vitro DI studies should be included under the Drug Interaction Studies heading. In
550	addition, specific details regarding the mechanism of the DI (e.g., time dependent
551	inhibition) should also be provided, when pertinent. The CLINICAL
552	PHARMACOLOGY section should not include instructions to prevent or manage a
553	clinically significant DI. <sup>57</sup> If positive findings are discussed under the Drug Interaction
554	Studies heading but the: <sup>58</sup>
555	
556	• Findings are not clinically significant, then an additional statement about the lack of
557	clinical significance of the findings should be included under this heading
558	
559	• Clinical significance of these findings is unknown, then an additional statement that
560	the clinical significance of the findings is unknown should be included under this
561	heading
562	
563 •	PATIENT COUNSELING INFORMATION: DI information for HCPs to convey to
564	patients (or caregivers) should be included in this section if it concerns an important risk
565	(e.g., the DI is mentioned in the BOXED WARNING, CONTRAINDICATIONS, or

<sup>54</sup> 21 CFR 201.57(c)(13)(i).

<sup>58</sup> See the FDA guidance for industry *Clinical Pharmacology Section of Labeling for Human Prescription Drug and Biological Products – Content and Format* (December 2016).

<sup>&</sup>lt;sup>53</sup> 21 CFR 201.57(c)(6)(iv).

<sup>&</sup>lt;sup>55</sup> See the FDA guidance for industry *Clinical Pharmacology Section of Labeling for Human Prescription Drug and Biological Products – Content and Format* (December 2016).

<sup>&</sup>lt;sup>56</sup> See the FDA guidance for industry *Clinical Pharmacology Section of Labeling for Human Prescription Drug and Biological Products – Content and Format* (December 2016).

<sup>&</sup>lt;sup>57</sup> See the FDA guidance for industry *Clinical Pharmacology Section of Labeling for Human Prescription Drug and Biological Products – Content and Format* (December 2016).

Draft – Not for Implementation

566 567 568 569 570 571 572		WARNINGS AND PRECAUTIONS sections). <sup>59</sup> Additionally, DI information for HCPs to convey to patients (or caregivers) should be included in this section if concomitant use could be initiated by the patient (e.g., an interaction with a nonprescription drug or food). <sup>5960</sup> A complete listing of known DIs should typically not be included in this section because the decision to concomitantly use two prescription drugs generally rests with the HCP at the time of prescribing. <sup>5961</sup>	
573			
574	VI.	DRUG INTERACTION CONTENT IN THE HIGHLIGHTS OF PRESCRIBING	
575		INFORMATION	
576			
577	The I	Drug Interactions heading in the Highlights must include a concise summary of the	
578		nation required under the DRUG INTERACTIONS section of the FPI. <sup>62</sup> This concise	
579		hary of information should typically include, <sup>63</sup> but is not limited to, a listing of the most	
580		ally significant DIs and the practical instructions for preventing or managing those	
581	clinic	ally significant DIs. For example:	
582			
583		DRUG INTERACTIONS	
584			
585			
586		• <i>Moderate CYP3A Inhibitors:</i> Reduce DRUG-X dosage to 50 mg once daily (2.x, 7.x).	
587			
588		• Hepatic impairment: Avoid concomitant use with DRUG-X.	
589 590		• Normal hepatic function: Monitor liver enzymes weekly for the first four weeks and then monthly during concomitant use with DRUG-X.	
590 591		and then monthly during concommant use with DKOO-X.	
591 592		< ···	
592 593	Wher	space in Highlights permits (e.g., when additional information does not cause Highlights	
594		greater than one-half page in length), <sup>64</sup> the Drug Interactions heading in Highlights should	
595		nclude the effects of the clinically significant DI concerning potential safety hazards not	

<sup>&</sup>lt;sup>59</sup> See the FDA guidance for industry *Patient Counseling Information Section of Labeling for Human Prescription Drugs and Biological Products – Content and Format* (December 2014).

<sup>61</sup> See the FDA guidance for industry *Patient Counseling Information Section of Labeling for Human Prescription Drugs and Biological Products – Content and Format* (December 2014).

62 21 CFR 201.57(a)(12).

<sup>63</sup> See section VI.B of this guidance for situations when a drug has numerous clinically significant DIs, and it is not possible to concisely summarize each clinically significant DI and their prevention or management instructions under the Drug Interactions heading in Highlights.

<sup>64</sup> 21 CFR 201.57(d)(8) and also see the FDA guidance for industry *Labeling for Human Prescription Drug and Biological Products — Implementing the PLR Content and Format Requirements* (February 2013).

<sup>&</sup>lt;sup>60</sup> See the FDA guidance for industry *Patient Counseling Information Section of Labeling for Human Prescription Drugs and Biological Products – Content and Format* (December 2014).

596	captured elsewhere in Highlights. For example:		
597			
598	DRUG INTERACTIONS		
599			
600	• Strong CYP3A Inhibitors: Avoid concomitant use with DRUG-X. Concomitant use with DRUC X may increase the rich of humatonsion and suppose (7 y)		
601	with DRUG-X may increase the risk of hypotension and syncope (7.x).		
602	• Moderate CYP3A Inhibitors: Reduce DRUG-X dosage to 50 mg once daily.		
603	Concomitant use with DRUG-X may increase the risk of hypotension (2.x, 7.x).		
604	• <i>Hepatotoxic Drugs:</i> Concomitant use with DRUG-X may increase the risk of		
605	hepatotoxicity. In patients with $(7.x)$ :		
606	• Hepatic impairment: Avoid concomitant use with DRUG-X.		
607	• Normal hepatic function: Monitor liver enzymes weekly for the first four weeks and		
608	then monthly during concomitant use with DRUG-X.		
609	5····		
610	If there is more then are alinically significant DI that is annuamista to include under the Drug		
611	If there is more than one clinically significant DI that is appropriate to include under the Drug Interactions heading in Highlights, the order of these DIs should be consistent with the ordering		
612 613	of these DIs in the DRUG INTERACTIONS section of the FPI. <sup>65</sup> If there are no clinically		
614			
615	significant DIs, the Drug Interactions heading should be omitted from Highlights. <sup>66</sup> Generally, the FDA recommends that Highlights not include statements about the absence of a clinically		
616	significant DI.		
617	Significant DI.		
618	When information about a DI appears in more than one section of the FPI, the information		
619	should typically be presented only once in Highlights. <sup>67</sup> DIs that are summarized elsewhere in		
620	Highlights (e.g., Boxed Warning, Contraindications heading, Warnings and Precautions heading)		
621	need not be repeated under the Drug Interactions heading in Highlights. <sup>68</sup>		
622			
623	A. Streamlining Information Under the Dosage and Administration Heading		
624	and the Drug Interactions Heading in the Highlights		
625	8 8 8 8		
626	To minimize redundancy and fragmentation of DI information between the Dosage and		
627	Administration and the Drug Interactions headings in Highlights, dosage modifications due to		
628	DIs should be included under the Drug Interactions heading instead of the Dosage and		
629	Administration heading in Highlights. The Drug Interactions heading should include		
630	modifications for the subject drug and for drugs affected by the subject drug. For example:		

<sup>&</sup>lt;sup>65</sup> See the FDA guidance for industry Labeling for Human Prescription Drug and Biological Products — Implementing the PLR Content and Format Requirements (February 2013).

<sup>&</sup>lt;sup>66</sup> See the FDA guidance for industry Labeling for Human Prescription Drug and Biological Products — Implementing the PLR Content and Format Requirements (February 2013).

<sup>&</sup>lt;sup>67</sup> See the FDA guidance for industry *Labeling for Human Prescription Drug and Biological Products* — *Implementing the PLR Content and Format Requirements* (February 2013).

<sup>&</sup>lt;sup>68</sup> See the FDA guidance for industry Labeling for Human Prescription Drug and Biological Products — Implementing the PLR Content and Format Requirements (February 2013).

631	
632	DRUG INTERACTIONS
633	• <i>Strong CYP1A2 Inhibitors:</i> Avoid concomitant use with DRUG-X. If concomitant use
634	is unavoidable, reduce DRUG-X dosage to 50 mg once daily (2.x, 7.x).
635	• <i>Drugofen-a:</i> Reduce DRUG-X dosage to 50 mg once daily (2.x, 7.x).
636	
637	In addition to the information required for the Dosage and Administration heading in
638	Highlights, <sup>69</sup> a reference under this heading should be included to the DI-related dosage
639	modifications for the subject drug in the DOSAGE AND ADMINISTRATION section of the
640	FPI. For example:
641	
642	DOSAGE AND ADMINISTRATION
643	Ś
644	See full prescribing information for DRUG-X dosage modifications due to drug
645	interactions (2.x).
646	<
647	
648	<b>B.</b> When There Are Numerous Clinically Significant DIs to Summarize
649	
650	When a drug has numerous clinically significant DIs, it may not be possible to concisely
651	summarize each clinically significant DI and their prevention or management instructions under
652	the Drug Interactions heading in Highlights due to the half-page length requirement. <sup>70</sup> In these
653	instances, information under the Drug Interactions heading should include: (1) DIs that are most
654	critical to the safe and effective use of the drug; and (2) a statement to alert the HCP to the
655	presence of additional DI information in the DRUG INTERACTIONS section of the FPI. <sup>71</sup> For
656 657	example:
658	DRUG INTERACTIONS
	• <u>QT-prolonging Drugs</u> : Avoid concomitant use with DRUG-X (7.x).
659	<ul> <li><u>O1-protoinging Drugs</u>. Avoid concomitant use with DROG-X (7.x).</li> <li><u>Hormonal Contraceptives</u>: Avoid concomitant use with DRUG-X. Use alternative</li> </ul>
660 661	nonhormonal contraceptives. Avoid concomitant use with DROG-A. Use alternative
	discontinuation of DRUG-X (7.x).
662	<ul> <li>Other Antiretroviral Drugs: Because DRUG-X is a complete regimen for the</li> </ul>
663	• <u>Other Antiretroviral Drugs</u> : Because DROG-X is a complete regimen for the treatment of HIV, concomitant use is not recommended (7.x).
664	
665	• See full prescribing information for additional clinically significant drug interactions

<sup>&</sup>lt;sup>69</sup> A concise summary of the information required under the DOSAGE AND ADMINISTRATION section of the FPI, with any appropriate subheadings, including the recommended dosage regimen, starting dose, dose range, critical differences among population subsets, monitoring recommendations, and other clinically significant clinical pharmacologic information must be included under the Dosage and Administration heading in Highlights. See 21 CFR 201.57(a)(7).

<sup>&</sup>lt;sup>70</sup> 21 CFR 201.57(d)(8) and also see the FDA guidance for industry *Labeling for Human Prescription Drug and Biological Products — Implementing the PLR Content and Format Requirements* (February 2013).

<sup>&</sup>lt;sup>71</sup> See the FDA guidance for industry *Labeling for Human Prescription Drug and Biological Products* — *Implementing the PLR Content and Format Requirements* (February 2013).

Draft – Not for Implementation

and recommended dosage modifications due to drug interactions (2.x, 7.x).

Draft — Not for Implementation

#### 667 VII. ABBREVIATIONS

668

AUC	Area under the concentration-time curve		
BCRP	Breast Cancer Resistance Protein		
CFR	Code of Federal Regulations		
CNS	Central nervous system		
CYP	Cytochrome P450		
DI	Drug interaction		
EDTA	Ethylenediaminetetraacetic acid		
FPI	Full Prescribing Information		
HIV	Human immunodeficiency virus		
IFN	Interferon		
IL	Interleukin		
INR	International normalized ratio		
MAO	Monoamine oxidase		
MATE	Multidrug And Toxic Compound Extrusion		
OAT1	Organic anion transporter		
OATP	Organic anion transporter protein		
OCT	Organic cation transporter		
PD	Pharmacodynamic		
P-gp	P-glycoprotein		
PK	Pharmacokinetic		
PLR	Physician Labeling Rule		
QT	QT-interval		
TNF	Tumor necrosis factor		
UDP	Uridine 5'-diphosphate		
UGT	Uridine 5'-diphospho-glucuronosyltransferase		
URL	Uniform Resource Locator		

669

670

Draft — Not for Implementation

### 671 VIII. DEFINITIONS

1	-	$\mathbf{a}$	
n	1	/	

Moderate inhibitor	Drug that increases the AUC of sensitive index substrates of a given metabolic enzyme by $\geq$ 2- to < 5-fold.
Strong inducer	Drug that decreases the AUC of sensitive index substrates of a given metabolic enzyme by $\ge 80$ percent.
Strong inhibitor	Drug that increases the AUC of sensitive index substrates of a given metabolic enzyme $\geq$ 5-fold.
Substrate	Drug whose exposure changes due to inhibition or induction of an enzyme or transporter.

673

Draft — Not for Implementation

#### 674 IX. APPENDIX

675

The following fictitious labeling example for DRUG-X (drugozide-x) includes excerpts from its Highlights of Prescribing Information and Full Prescribing Information that illustrate the content and format of drug interaction (DI) information throughout the Prescribing Information. Various formatting techniques (e.g., headings, a table, white space) are used to enhance communication of DI information in this fictitious labeling example. The content and format used in this example are meant to be illustrative only and are not intended to limit the use of other possible formats and approaches to convey DI information in the labeling.

683 684	HIGHLIGHTS OF PRESCRIBING INFORMATION
685 686	···· DOSAGE AND ADMINISTRATION
687	<
688 689 690	• See full prescribing information for DRUG-X dosage modifications with concomitant use of moderate CYP3A inhibitors (2.4).
690 691	CONTRAINDICATIONS
692	• Concomitant use with strong CYP1A2 inhibitors (4, 5.1).
693	
694	WARNINGS AND PRECAUTIONS
695	• Sedation and Respiratory Depression: Closely monitor for signs of
696	sedation and respiratory depression with concomitant use of DRUG-X
697	with CNS depressants (5.2).
698	
699	DRUG INTERACTIONS
700	
701	• <i>Strong CYP3A Inhibitors:</i> Avoid concomitant use with DRUG-X (7.1).
702 703	• <i>Moderate CYP3A Inhibitors:</i> Reduce DRUG-X dosage to 100 mg once daily (2.4, 7.1).
704	• Strong CYP3A Inducers: Avoid concomitant use with DRUG-X (7.1).
705	• CYP3A Substrates: Avoid concomitant use unless otherwise
706	recommended in the Prescribing Information for CYP3A substrates
707	where minimal concentration changes may lead to serious adverse
708	reactions (7.2).
709	
710	
711	FULL PRESCRIBING INFORMATION
712	
713	
714	2 DOSAGE AND ADMINISTRATION
715	<
716	2.4 Dosage Modifications for CYP3A Inhibitors
717	Avoid concomitant use of DRUG-X with strong CYP3A inhibitors. Reduce the DRUG-X
718	dosage to 100 mg once daily when used concomitantly with moderate CYP3A inhibitors

Draft – Not for Implementation

719	[see Drug Interacti	ions (7.1)].			
720	<				
721	4 CONTRAINDICATIONS				
722	DRUG-X is contraindicated in patients taking strong CYP1A2 inhibitors [see Warnings				
723	and Precautions (5.1) and Drug Interactions (7.1)].				
724	}				
725	5 WARNINGS A	ND PRECAUTIONS			
726	5.1 Severe Hypote	nsion and Syncope with Concomitant Strong CYP1A2 Inhibitors			
727		se of DRUG-X with strong CYP1A2 inhibitors is contraindicated [see			
728		(7.1)]. In Studies 1 and 2, severe hypotension or syncope requiring			
729	medical interventio	n occurred in 20% of patients treated concomitantly with DRUG-X			
730	and a strong CYP1	A2 inhibitor [see Adverse Reactions (6.1)].			
731	}				
732		Respiratory Depression			
733		r signs of sedation and respiratory depression with concomitant use of			
734		S depressants. In Studies 1 and 2, sedation, somnolence, and reduced			
735		ion that required dosage interruption or reduction occurred in 19% of			
736	<	DRUG-X-treated patients compared to 0% of placebo-treated patients [see Adverse			
737	<i>Reactions (6.1)]</i> .				
738					
739	Concomitant use of DRUG-X with opioids, benzodiazepines, or other CNS depressants				
740	may increase the risk of sedation and respiratory depression [see Drug Interactions (7.3)				
741	and Clinical Pharmacology (12.2)].				
742	< ····				
743					
744	7 DRUG INTER				
745	7.1 Effects of Other Drugs on DRUG-X				
746	Table X describes drug interactions where concomitant use of another drug affects				
747	DRUG-X.				
748	$\sum_{i=1}^{n}$				
749		eractions: Concomitant Use of Other Drugs Affect the Use of			
750	<b>DRUG-X</b>				
751	Ś				
	Strong CYP1A2	Inhibitors <sup>1</sup>			
	Prevention or Management	Concomitant use of DRUG-X with strong CYP1A2 inhibitors is contraindicated.			
		Drugozide-x is a CYP1A2 substrate. Strong CYP1A2 inhibitors			

Warnings and Precautions (5.1)].

Mechanism and

*Clinical Effect(s)* 

Prevention or Management

Strong and Moderate CYP3A Inhibitors<sup>1</sup>

increase drugozide-x exposure [see Clinical Pharmacology

Strong CYP3A Inhibitors: Avoid concomitant use.

(12.3)], which may cause severe hypotension and syncope [see

Moderate CYP3A Inhibitors: Reduce the DRUG-X dosage *[see* 

Draft – Not for Implementation

	Dosage and Administration (2.4)].
Mechanism and Clinical Effect(s)	Drugozide-x is a CYP3A substrate. Strong or moderate CYP3A inhibitors increase drugozide-x exposure <i>[see Clinical Pharmacology (12.3)]</i> , which may increase the risk of DRUG-X adverse reactions.
Strong CYP3A Inc	ducers <sup>1</sup>
Prevention or Management	Avoid concomitant use of DRUG-X with strong CYP3A inducers.
Mechanism and Clinical Effect(s)	Drugozide-x is a CYP3A substrate. Strong CYP3A inducers decrease drugozide-x exposure <i>[see Clinical Pharmacology (12.3)]</i> , which may reduce the effectiveness of DRUG-X.
	andTransporterInteractingDrugs for examples of strong CYP1A2 inhibitors, stron nhibitors, and strong CYP3A inducers.
CYP3A substrates. Drugozide-x is a CY	fda.gov/CYPandTransporterInteractingDrugs for examples of P3A inhibitor. Drugozide-x increases exposure of CYP3A substrate acology (12.3)], which may increase the risk of adverse reactions trates.
<b>7.3 CNS Depressant</b> Closely monitor for s DRUG-X with CNS	signs of sedation and respiratory depression with concomitant use of
depressants (e.g., opi	pharmacologic effect, concomitant use of DRUG-X with CNS ioids, benzodiazepines) may increase the risk of sedation and on [see Warnings and Precautions (5.2) and Clinical Pharmacology
 12 CLINICAL PH	IARMACOLOGY
•••	
12.2 Pharmacodyna	imics
Drug Interaction Stud	dies
-	easures of sedation increased, and psychomotor performance

*Benzodiazepines:* Measures of sedation increased, and psychomotor performance
 decreased in approximately 63% of DRUG-X-treated patients who received concomitant

785 786	diazepam compared to 23% of those who received DRUG-X alone [see Warnings and Precautions (5.2) and Drug Interactions (7.3)].
787	
788	12.3 Pharmacokinetics
789	
790	Drug Interaction Studies
791	
	<i>Clinical Studies and Model-Informed Approaches:</i> There is no clinically significant drug
792 793	interaction with proton pump inhibitors, histamine-2 receptor antagonists, or antacids.
794	
795	Strong CYP1A2 Inhibitors: Fluvoxamine (strong CYP1A2 inhibitor) increased the
796	$\sim$ mean (min-max) ratio of drugozide-x AUC 6.5-fold (5.5-7.8) and C <sub>max</sub> 2-fold (1.6-
797	2.6) [see Drug Interactions (7.1)].
798	
799	Strong and Moderate CYP3A Inhibitors: Ketoconazole (strong CYP3A inhibitor)
800	$\sim$ increased mean drugozide-x AUC by 3.9-fold (2.9-5.2) with no changes to C <sub>max</sub> .
801	Fluconazole (moderate CYP3A inhibitor) increased drugozide-x AUC 2.1-fold (1.8-
802	2.4) [see Drug Interactions (7.1)].
803	
804	Strong CYP3A Inducers: Rifampin (strong CYP3A inducer) decreased mean
805	drugozide-x AUC by 78% and $C_{max}$ by 54% [see Drug Interactions (7.1)].
806	
807	Sensitive CYP3A Substrates: Drugozide-x increased midazolam (sensitive CYP3A
808	substrate) AUC 2.3-fold (1.5-3.1) and C <sub>max</sub> 1.8-fold (1.3-2.2) [see Drug Interactions
809	(7.2)].
810	
811	In Vitro Drug Interaction Studies
812	
813	<u>Cytochrome P450 (CYP450) Enzymes</u> : Drugozide-x does not inhibit or induce CYP
814	isozymes 1A2, 2B6, 2C8, 2C9, 2C19, and 2D6. Drugozide-x is not a substrate of
815	CYP isozymes 2B6, 2C8, 2C9, 2C19, and 2D6.
816	
817	UDP-Glucuronosyltransferase (UGT): Drugozide-x does not inhibit and is not a
818	substrate of UGTs 1A1, 1A3, 1A6, and 1A9.
819	
820	<i><u>Transporter systems</u>:</i> Drugozide-x does not inhibit and is not a substrate of P-gp,
821	BCRP, OAT1, OAT3, OATP1B1, OATP1B3, OCT2, MATE1, and MATE2-K.
822	< , , , , , , , , , ,
823	[Instead of including information on in vitro DI studies in text as exemplified above, such
824	information may be presented in a table (see below) as an alternative.]
825	internation may be presented in a more (see below) as an alternative.]
826	<i>In Vitro Drug Interaction Studies:</i> Table X presents metabolic enzymes and transporter
827	systems that showed no effect on or by drugozide-x in vitro.
828	
828 829	<b>Table X: Metabolic Enzymes and Transporter Systems that Showed No Effect</b>
830	on or by Drugozide-x in Vitro
0.50	> on or by bragoziat-x in vitro

System	Inhibition	Induction	Substrate
Cytochrome P450 (CYP)	1A2 2B6 2C8 2C9 2C19 2D6	1A2 2B6 2C8 2C9 C19	2B6 2C8 2C9 2C19 2D6
UDP- Glucuronosyltransferase (UGT):	1A1 1A3 1A6 1A9		1A1 1A3 1A6 1A9
Transporter systems	P-gp BCRP OAT1 OAT3 OATP1B1 OATP1B3 OCT2 MATE1 MATE2-K		P-gp BCRP OAT1 OAT3 OATP1B1 OATP1B3 OCT2 MATE1 MATE2-K

831	
832	17 PATIENT COUNSELING INFORMATION <sup>72</sup>
833	<
834	Sedation and Respiratory Depression
835	Advise patients or their caregivers of the increased risk of sedation, somnolence, and
836	> reduced psychomotor function with concomitant use of DRUG-X and CNS depressants,
837	and to monitor for signs of sedation and respiratory depression when using DRUG-X
838	concomitantly with CNS depressants [see Warnings and Precautions (5.2)].

<sup>&</sup>lt;sup>72</sup> In this fictitious example, the concomitant use of DRUG-X with strong CYP1A2 inhibitors is contraindicated because of the risks of severe hypotension and syncope. According to the FDA guidance for industry *Patient Counseling Information Section of Labeling for Human Prescription Drugs and Biological Products – Content and Format,* " [a]lthough contraindications are essential for informing prescribing decisions, most [contraindications] are typically not appropriate for a patient counseling discussion that occurs once a prescribing decision has been made." Therefore, in this example the risk of severe hypotension and syncope with concomitant strong CYP1A2 inhibitors was not discussed in the PATIENT COUNSELING INFORMATION section.