OPDP Update on Oversight of Prescription Drug Promotion

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Goal and Objectives

- Goal
  - To protect and promote public health
- Objectives
  - Ensure that prescription drug promotion is not false or misleading
  - Ensure that balanced picture of the drug is conveyed
  - Aid in the communication of more useful information about drugs and medical conditions to the American public

Mechanisms for Meeting Objectives

- Voluntary compliance program
- Social Science research program
- Comprehensive surveillance and enforcement program

Otezla Untitled Letter

- DTC television ad
- Indication:
  - Otezla is indicated for the treatment of adult patients with active psoriatic arthritis
  - Otezla is also indicated for the treatment of patients with moderate to severe plague psoriasis who are candidates for phototherapy or systemic therapy
- Presentation of the risk information for Otezla

Presentation of Major Statement

- Risk presentation in audio
- Presentation of the competing and attention-grabbing visuals in conjunction with the risk in the audio
- Supers with different and competing messages
- Music changes during the presentation of the major statement

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Date: 06.21.16
Agency: Evoke Health
Client: Celgene
Brand: Otezla
Product: Otezla PsO
Title: "Showing/Fearless"
Ad-Id#: 10TE0013000H
Audio: 5.1 Surround
Length: :60

TUXARIN ER Warning Letter

- Webpage
- Indication:
  - TUXARIN ER is indicated for the relief of cough and symptoms associated with upper respiratory allergies or a common cold in adults 18 years of age and older
  - **Important Limitation of Use**
    - Not indicated for pediatric patients under 18 years of age
- Boxed warning regarding respiratory depression and death which have occurred in children who received codeine following tonsillectomy and/or adenoidectomy
- Contraindications include postoperative pain management in children who have undergone tonsillectomy and/or adenoidectomy

Tuxarin ER®

"First Long Acting Tablet, Schedule III, Codeine Antitussive Combination with Chlorpheniramine Antihistamine"

- Long acting
- DEA Schedule III
- 40 mg codeine/chlorpheniramine combo tablet
- Minimize serious risk of over dosing
- No spills or taste issues
- Patent Protected-OB listable issued claims.

TUXARIN ER presentation

- Vast majority of patients with cough, cold & flu also have runny nose symptoms.
- Currently most codeine containing antitussives require four to six (4-6) times a day dosing.
- Chlopheniramine is an antihistamine that blocks histamine receptors. Histamine is a chemical that causes inflammation and sneezing. It helps to dry your runny nose, provide relief for sneezing, itchy and watery eyes, and itching of the nose, throat, and roof of the mouth, and calm the cough.
- Chlorpheniramine is most widely used antihistamine to manage cough and cold symptoms.
- Issues with Hydrocodone and Chlorpheniramine commercial products
    - Current market is dominated by liquids prone to serious risk of dosing errors.
- Issues with Promethazine (antihistamine) plus Codeine commercial products.
    - Current market is dominated by short acting liquids that are prone to dosing errors.
    - FDA requires boxed warning added to all promethazine containing products
    - Unlike promethazine no known serious safety issues with Chlorpheniramine

TUXARIN ER Warning Letter

- Claims
  - Minimize serious risk of over dosing
  - Issues with Hydrocodone and Chlorpheniramine commercial products
    - Current market is dominated by liquids prone to serious risk of dosing errors
  - Issues with Promethazine (antihistamine) plus Codeine commercial products
    - Current market is dominated by short acting liquids that are prone to dosing errors
    - FDA requires boxed warning added to all promethazine containing products
    - Unlike promethazine no known serious safety issues with Chlorpheniramine
- Claims suggest that Tuxarin ER is safer than its competitors based on differences in dosage formulation and safety profiles of individual ingredients

TUXARIN ER Warning Letter

- Claims
  - Chlorpheniramine … helps to dry your runny nose, provide relief for sneezing, itchy and watery eyes, and itching of the nose, throat, and roof of the mouth, and calm the cough
  - Chlorpheniramine is most widely used antihistamine to manage cough and cold symptoms
- Claims fail to adequately communicate the full approved indication
  - TUXARIN ER is indicated for the relief of cough and symptoms associated with upper respiratory allergies or a common cold in adults 18 years of age and older
  - **Important Limitation of Use**
    - Not indicated for pediatric patients under 18 years of age

Saroglitazar Untitled Letter

- Company video on YouTube

- Video suggests, in a promotional context, that Saroglitazar (also referred to by the proprietary name “Lipaglyn”), an investigational new drug, is safe and effective for the purposes for which it being investigated or otherwise promotes the drug

Saroglitazar Untitled Letter

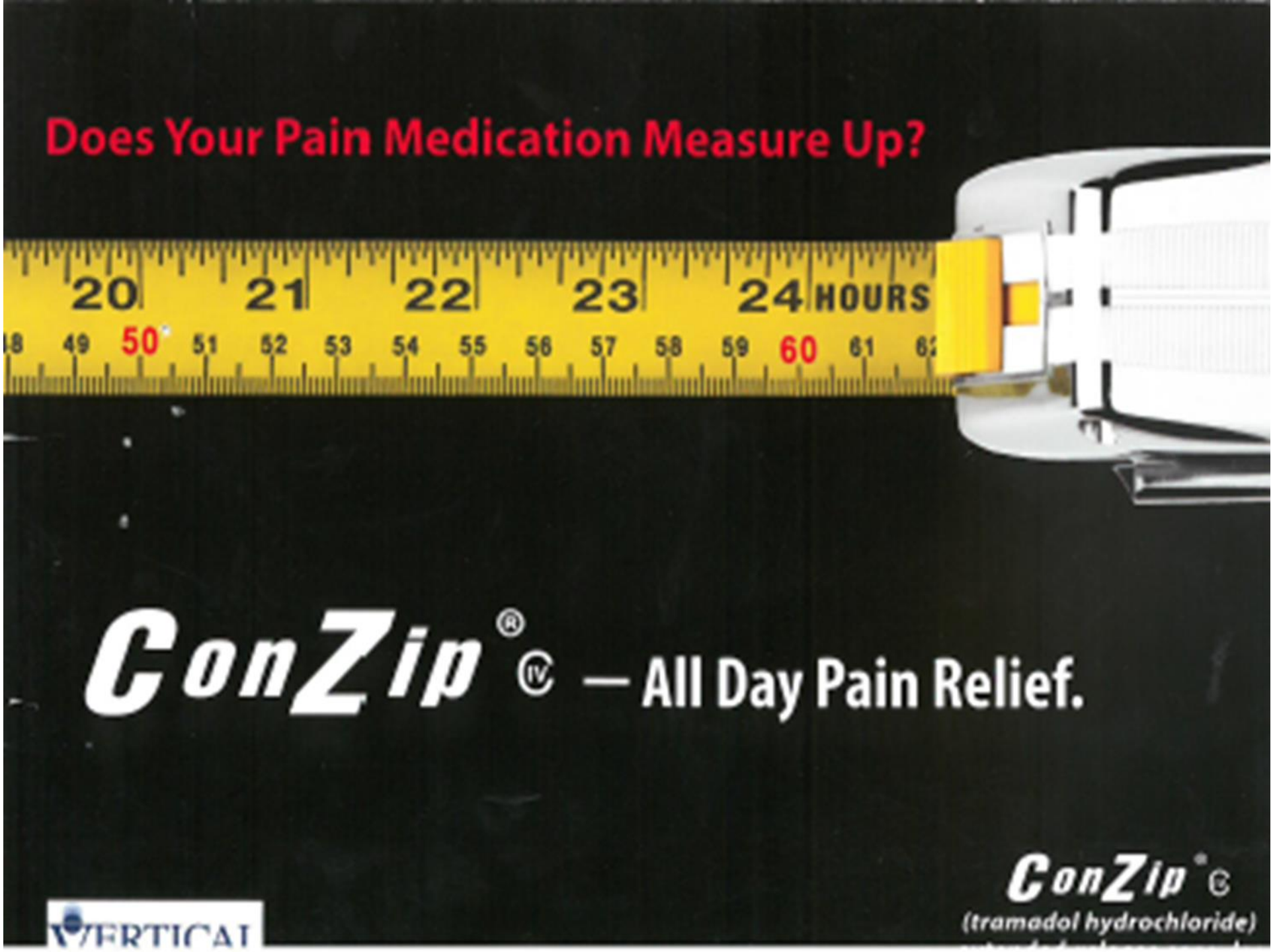
- Claims in voiceover and super in the video
  - Novel. Superior. Dual Acting
  - Lipaglyn is a novel first in class therapy that brings in dual lipid and glycemic control in one molecule …
  - Lipaglyn ushers in a new age in diabetic dyslipidemia management
  - Unlike other molecules it does not cause weight gain, edema, cardiac, renal, liver, or muscle toxicity

Saroglitazar Untitled Letter

- Presentation makes conclusions that the drug
  - Is indicated for treatment of patients with diabetic dyslipidemia and hypertriglyceridemia with Type 2 diabetes mellitus
  - Is superior to other molecules
  - Is not associated with many serious risks that are generally attributed to these other molecules with similar mechanisms of action when Saroglitazar has not been proven to be safe and effective within the meaning the FD&C Act and has not been approved as a drug under that authority for any use

CONZIP Warning Letter

- Professional Detail Aid
- Indication:
  - CONZIP is an opioid agonist indicated for the management of pain severe enough to require daily around-the-clock, long-term opioid treatment and for which alternative treatment options are inadequate
  - **Limitation of Use**
    - Because of the risks of addiction, abuse, and misuse with opioids, even at recommended doses, and because of the greater risks of overdose and death with extended-release/long-acting opioid formulations, reserve CONZIP for use in patients for whom alternative treatment options (e.g., non-opioid analgesics or immediate-release opioids) are ineffective, not tolerated, or would be otherwise inadequate to provide sufficient management of pain
    - CONZIP is not indicated as an as-needed (prn) analgesic


Does Your Pain Medication Measure Up?
20 21 22 23 24 HOURS
48 49 50 51 52 53 54 55 56 57 58 59 60 61
ConZip® ℞ — All Day Pain Relief.
ConZip® ℞
(tramadol hydrochloride)
VERTICAL

ConZip® Measures Up

ConZip® is an opioid agonist indicated for the management of moderate to moderately severe chronic pain in adults who require around-the-clock treatment of their pain for an extended period of time.

All Day Pain Relief

ConZip® provides a novel combination of:

- ***immediate release tramadol***
- ***extended release tramadol***

Capsule Strength	Immediate-Release Tramadol	Extended-Release Tramadol
ConZip 100 mg	25 mg	75 mg
ConZip 200 mg	50 mg	150 mg
ConZip 300 mg	50 mg	250 mg

ConZip® is classified as a schedule IV controlled substance by federal regulation.

CONZIP Claims

- ConZip CIV – All Day Pain Relief
- ConZip CIV Measures Up
- ConZip is an opioid agonist indicated for the management of moderate to moderately severe chronic pain in adults who require around-the-clock treatment of their pain for an extended period of time

Omission of Material Facts

- Omission of Material Facts from Detail Aid
- Indication:
  - CONZIP is an opioid agonist indicated for the management of pain severe enough to require daily around-the-clock, long-term opioid treatment and for which alternative treatment options are inadequate
  - **Limitation of Use**
    - Because of the risks of addiction, abuse, and misuse with opioids, even at recommended doses, and because of the greater risks of overdose and death with extended-release/long-acting opioid formulations, reserve CONZIP for use in patients for whom alternative treatment options (e.g., non-opioid analgesics or immediate-release opioids) are ineffective, not tolerated, or would be otherwise inadequate to provide sufficient management of pain
    - Conzip is not indicated as an as-needed (prn) analgesic

OPDP Web Resources

- OPDP Home Page
  - http://www.fda.gov/AboutFDA/CentersOffices/OfficeofMedicalProductsandTobacco/CDER/ucm090142.htm
- Guidances
  - http://www.fda.gov/AboutFDA/CentersOffices/OfficeofMedicalProductsandTobacco/CDER/ucm109905.htm#Guidances
- Social Science Research
  - https://www.fda.gov/AboutFDA/CentersOffices/OfficeofMedicalProductsandTobacco/CDER/ucm090276.htm
- Warning and Untitled Letters
  - www.fda.gov/Drugs/GuidanceComplianceRegulatoryInformation/EnforcementActivitiesbyFDA/WarningLettersandNoticeofViolationLetterstoPharmaceuticalCcompanies/default.htm

OPDP Contact Information

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FDA
U.S. FOOD & DRUG
ADMINISTRATION