

# FDA Drug Topics: The Ins and Outs of Prescription Drug Labeling



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Food and Drug Administration

# Disclaimer

- The views and opinions expressed in this presentation represent those of the presenter, and do not necessarily represent an official FDA position.
- The labeling examples in this presentation are provided only to demonstrate current labeling development challenges and should not be considered FDA recommended templates.

# Objectives

- Review the different types of FDA-approved prescription drug labeling
- Discuss the process for FDA approval of prescription drug labeling
- Describe the contents of selected parts of the Prescribing Information
- Explain the differences between generic drug labeling and reference listed drug labeling
- Discuss prescription drug labeling resources

# Different Types of FDA- Approved Prescription Drug Labeling

# Labels vs. Labeling<sup>1</sup>



- Labels: a display of written, printed, or graphic matter upon the immediate container of any article. For example:
  - Container label
  
- Labeling: all labels and other written, printed, or graphic matters upon any article (or its containers or wrappers) or accompanying the article. Examples include:
  - Container label and carton labeling
  - FDA-approved patient labeling
  - Prescribing Information

<sup>1</sup> See Section 201, Chapter II, (k) and (m) of Food Drug and Cosmetic Act (FD&C Act)

# Prescription Drug Labeling



Each capsule contains:  
New Drug Palmitate USP .....10 mg  
(equivalent to 8.72 mg New Drug)

NDC 12345-678-90

DRUG-X

(new drug palmitate) CAPSULES

USP

10 mg

Pharmacist: Please dispense with Medication Guide provided separately

Rx only 100 CAPSULES

Container Label

Recommended Adult Dosage: See prescribing information

Dispense in a light-, light-resistant container as defined in the USP, with a child-resistant closure. Keep tightly closed.

Store at 25°C (77°F); excursions permitted to 15° to 30°C (59° to 86°F). [See USP controlled room temperature.]

Manufactured by: ABC Limited

-678-90-C79-01-A

**HIGHLIGHTS OF PRESCRIBING INFORMATION**  
These highlights do not include all the information needed to use PROPRIETARY NAME safely and effectively. See full prescribing information for PROPRIETARY NAME.

**PROPRIETARY NAME** (nonproprietary name) dosage form, route of administration, controlled substance symbol  
Initial U.S. Approval: YYYY

WARNING: TITLE OF WARNING

See full prescribing information for complete boxed warning.

- Text (4)
- Text (5.x)

Section Title, Subsection Title (x.x) M/YYYY  
Section Title, Subsection Title (x.x) M/YYYY

RECENT MAJOR CHANGES

INDICATIONS AND USAGE

PROPRIETARY NAME is a (insert FDA established pharmacologic class text phrase) indicated for ... (1)

Limitations of Use  
Text (1)

DOSAGE AND ADMINISTRATION

- Text (2.x)
- Text (2.x)

Revised: M/YYYY

---

FULL PRESCRIBING INFORMATION: CONTENTS\*

**1 INDICATIONS AND USAGE**

**2 DOSAGE AND ADMINISTRATION**

2.1 Subsection Title

2.2 Subsection Title

**3 DOSAGE FORMS AND STRENGTHS**

**4 CONTRAINDICATIONS**

**5 WARNINGS AND PRECAUTIONS**

5.1 Subsection Title

5.2 Subsection Title

**6 ADVERSE REACTIONS**

6.1 Clinical Trials Experience

6.2 Immunogenicity

6.2 or 6.3 Postmarketing Experience

**7 DRUG INTERACTIONS**

7.1 Subsection Title

7.2 Subsection Title

**8 USE IN SPECIFIC POPULATIONS**

8.1 Pregnancy

8.2 Lactation (if not required to be in PLLR format use Labor and Delivery)

8.3 Females and Males of Reproductive Potential (if not required to be in PLLR format use Nursing Mothers)

8.4 Pediatric Use

8.5 Geriatric Use

8.6 Subpopulation X

**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

12.4 Microbiology

12.5 Pharmacogenomics

**13 NONCLINICAL TOXICOLOGY**

13.1 Carcinogenesis, Mutagenesis, Impairment of Fertility

13.2 Animal Toxicology and/or Pharmacology

**14 CLINICAL STUDIES**

14.1 Subsection Title

14.2 Subsection Title

**15 REFERENCES**

**16 HOW SUPPLIED/STORAGE AND HANDLING**

**17 PATIENT COUNSELING INFORMATION**

\* Sections or subsections omitted from the full prescribing information are not listed.

MEDICATION GUIDE

MYDRUG [mye-drug]

(drugoxide injection)

for intramuscular use

Patient Labeling

**What is the most important information I should know about MYDRUG?**

...

**What is MYDRUG?**

...

**Who should not take MYDRUG?**

...

**How should I take MYDRUG?**

...

**What should I avoid while taking MYDRUG?**

...

**What are the possible or reasonably likely side effects of MYDRUG?**

...

Call your healthcare provider for medical advice about side effects. You may report side effects to FDA at 1-800-FDA-1088.

**General information about the safe and effective use of MYDRUG.**

Medicines are sometimes prescribed for purposes other than those listed in a Medication Guide. Do not use MYDRUG for a condition for which it was not prescribed. Do not give MYDRUG to other people, even if they have the same symptoms that you have. It may harm them.

Drug Company X, City, State, zip code

This Medication Guide has been approved by the U.S. Food and Drug Administration.

Revised: MM/YYYY

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

...

Prescribing Information

# Container Label<sup>1</sup>

FDA

NDC 12345-678-90

**DRUG-X**

**(new drug palmitate) CAPSULES**

**USP**

**10 mg**

Pharmacist: Please dispense with Medication Guide provided separately

Rx only

100 CAPSULES

Each capsule contains:

New Drug Palmitate USP .....10 mg  
(equivalent to 8.72 mg New Drug)

Recommended Adult Dosage: See prescribing information

Dispense in a tight, light-resistant container as defined in the USP, with a child-resistant closure.  
Keep tightly closed.

Store at 25°C (77°F); excursions permitted to 15° to 30°C (59° to 86°F). [See USP controlled room temperature.]

Manufactured by: ABC Limited  
(Formulation Division)  
Anywhere, USA 54321

Distributed by: BBB packaging services  
Anyway, USA 33333



1234567890  
-678-90-C79-01-A

737363 Exp 07/14

<sup>1</sup> See draft guidance for industry: *Safety Considerations for Container Labels and Carton Labeling Design to Minimize Medication Errors* (April 2013). When final, this guidance will represent FDA's current thinking

# Patient Labeling



## FDA-Approved Patient Labeling

- Three most common types:
  - Medication Guides
  - Patient Package Inserts
  - Instructions for Use
- Proposed by applicant, and reviewed and approved by FDA
- Content is based on the Prescribing Information (PI)

## Patient Labeling Not Approved by FDA

### Consumer medication information

- Not submitted to FDA, not reviewed or approved by FDA



# Medication Guide<sup>1</sup>

## (FDA-Approved Patient Labeling)



**MEDICATION GUIDE**  
**MYDRUG [mye-drug]**  
**(drugoxide injection)**  
**for intramuscular use**

**What is the most important information I should know about MYDRUG?**

...

**What is MYDRUG?**

...

**Who should not take MYDRUG?**

...

**How should I take MYDRUG?**

...

**What should I avoid while taking MYDRUG?**

...

**What are the possible or reasonably likely side effects of MYDRUG?**

...

Call your healthcare provider for medical advice about side effects. You may report side effects to FDA at 1-800-FDA-1088.

**General information about the safe and effective use of MYDRUG.**

Medicines are sometimes prescribed for purposes other than those listed in a Medication Guide. Do not use MYDRUG for a condition for which it was not prescribed. Do not give MYDRUG to other people, even if they have the same symptoms that you have. It may harm them.

Drug Company X, City, State, zip code

This Medication Guide has been approved by the U.S. Food and Drug Administration.

Revised: MM/YYYY

**PATIENT INFORMATION**  
**MYDRUG [mye-drug]**  
**(drugoxide injection)**  
**for intramuscular use**



# Patient Package Insert<sup>1</sup> (FDA-Approved Patient Labeling)

<sup>1</sup> For oral contraceptives see 21 CFR 310.501) and for estrogen-containing products see 21 CFR 310.515.

<b>WARNING TO WOMEN WHO SMOKE</b>
Do not use MYDRUG if you smoke cigarettes and are over 35 years old. Smoking increases your risk of serious cardiovascular side effects (heart and blood vessel problems) from birth control pills, including death from heart attack, blood clots or stroke. This risk increases with age and the number of cigarettes you smoke.
<b>What is MYDRUG?</b>
...
<b>How does MYDRUG Work?</b>
...
<b>How well does MYDRUG work for contraception?</b>
...
<b>Who should not take MYDRUG?</b>
...
<b>Before you start taking MYDRUG:</b>
...
<b>When to start MYDRUG:</b>
...
<b>What should I do if I miss any pills?</b>
...
<b>What are the most serious risks of taking MYDRUG?</b>
...
<b>What are the common side effects of MYDRUG?</b>
...
Call your healthcare provider for medical advice about side effects. You may report side effects to FDA at 1-800-FDA-1088.
<b>What else should I know about taking MYDRUG?</b>
...
<b>General information about the safe and effective use of MYDRUG.</b>
Medicines are sometimes prescribed for purposes other than those listed in a Medication Guide. Do not use MYDRUG for a condition for which it was not prescribed. Do not give MYDRUG to other people, even if they have the same symptoms that you have. It may harm them.
Drug Company X, City, State, zip code

This Patient Information has been approved by the U.S. Food and Drug Administration.

# Instructions for Use<sup>1</sup>

## (FDA-Approved Patient Labeling)



**INSTRUCTIONS FOR USE**  
**MYDRUG [mye-drug]**  
**(drugoxide injection)**  
**for intramuscular use**

This Instructions for Use contains information on how to take MYDRUG.

**Important Information You Need to Know Before Taking MYDRUG**

...

**Preparing to Take MYDRUG**

...

**Taking MYDRUG**

...

**Storing MYDRUG**

...

**Disposing of MYDRUG**

...

Drug Company X, City, State, zip code

This Instructions for Use has been approved by the U.S. Food and Drug Administration.

Approved: MM/YYYY

<sup>1</sup> See the draft guidance for industry: *Instructions for Use — Patient Labeling for Human Prescription Drug and Biological Products and Drug-Device and Biologic-Device Combination Products— Content and Format* (July 2019). When final, this guidance will [11](#) represent the FDA’s current thinking on this topic.

# Prescribing Information (PI)<sup>1</sup>



Written for healthcare providers and must:

- Contain a summary of essential scientific information needed for safe and effective use of drugs and biological products
- Be informative and accurate and neither promotional in tone nor false or misleading in any particular
- Be updated when new information becomes available that causes labeling to become inaccurate, false, or misleading

<sup>1</sup> Applies to Physician Labeling Rule (PLR) labeling and “old” (non-PLR) format labeling; 21 CFR 201.56(a)

# Two Types of PI<sup>1</sup>

<b>BOXED WARNING</b>
<b>DESCRIPTION</b>
<b>CLINICAL PHARMACOLOGY</b>
<b>INDICATION AND USAGE</b>
<b>CONTRAINDICATIONS</b>
<b>WARNINGS</b>
<b>PRECAUTIONS</b>
General
Information for Patients
Laboratory Tests
Drug Interactions
Drug/Laboratory Test Interactions
Carcinogenesis
Impairment of
Pregnancy
Labor and De
Nursing Mothers
Pediatric Use
Geriatric Use
<b>ADVERSE REACTIONS</b>
<b>DRUG ABUSE AND DEPENDENCE</b>
<b>OVERDOSAGE</b>
<b>DOSAGE AND ADMINISTRATION</b>
<b>HOW SUPPLIED</b>

**“Old” Format  
(1979 final rule)**

**HIGHLIGHTS OF PRESCRIBING INFORMATION**  
These highlights do not include all the information needed to use PROPRIETARY NAME safely and effectively. See full prescribing information for PROPRIETARY NAME.

PROPRIETARY NAME (nonproprietary name) dosage form, route of administration, controlled substance symbol  
Initial U.S. Approval: YYYY

**WARNING: TITLE OF WARNING**  
*See full prescribing information for complete boxed warning.*

- Text (4)
- Text (5.x)

**RECENT MAJOR CHANGES**

Section Title, Subsection Title (x.x) M/YYYY  
Section Title, Subsection Title (x.x) M/YYYY

**INDICATIONS AND USAGE**

PROPRIETARY NAME is a (insert FDA established pharmacologic class text phrase) indicated for ... (1)

Limitations of Use  
Text (1)

**DOSAGE AND ADMINISTRATION**

- Text (2.x)
- Text (2.x)

**FULL PRESCRIBING INFORMATION: CONTENTS\***

- WARNING: TITLE OF WARNING**
- INDICATIONS AND USAGE**
  - DOSAGE AND ADMINISTRATION**
    - Subsection Title
    - Subsection Title
  - DOSAGE FORMS AND STRENGTHS**
  - CONTRAINDICATIONS**
  - WARNINGS AND PRECAUTIONS**
    - Subsection Title
    - Subsection Title
  - ADVERSE REACTIONS**
    - Clinical Trials Experience
    - Immunogenicity
    - 6.2 or 6.3 Postmarketing Experience
  - DRUG INTERACTIONS**
    - Subsection Title
    - Subsection Title
  - USE IN SPECIFIC POPULATIONS**
    - Pregnancy
    - Lactation (if not required to be in PLLR format use Labor and Delivery)
    - Females and Males of Reproductive Potential (if not required to be in PLLR format use Nursing Mothers)
    - Pediatric Use
    - Geriatric Use
    - Subpopulation X

- DOSAGE FORMS AND STRENGTHS**  
Dosage form(s): strength(s) (3)
- CONTRAINDICATIONS**
- Text (4)
  - Text (4)
- WARNINGS AND PRECAUTIONS**
- Text (5.x)
  - Text (5.x)
- ADVERSE REACTIONS**  
Most common adverse reactions (incidence > x%) are text (6.x)
- To report SUSPECTED ADVERSE REACTIONS, contact name of manufacturer at toll-free phone # or FDA at 1-800-FDA-1088 or [www.fda.gov/medwatch](http://www.fda.gov/medwatch).
- DRUG INTERACTIONS**
- Text (7.x)
  - Text (7.x)
- USE IN SPECIFIC POPULATIONS**
- Text (8.x)
  - Text (8.x)
- See 17 for PATIENT COUNSELING INFORMATION and FDA-approved patient labeling OR and Medication Guide.
- Revised: M/YYYY

**PLR Format  
(2006 final rule)**

- DRUG ABUSE AND DEPENDENCE**
    - Controlled Substance
    - Abuse
    - Dependence
  - of Fertility
  - 13.2 Animal Toxicology and/or Pharmacology
  - CLINICAL STUDIES**
    - Subsection Title
    - Subsection Title
  - REFERENCES**
  - HOW SUPPLIED/STORAGE AND HANDLING**
  - PATIENT COUNSELING INFORMATION**
- \* Sections or subsections omitted from the full prescribing information are not listed.

<b>BOXED WARNING</b>
<b>1 INDICATIONS AND USAGE</b>
<b>2 DOSAGE AND ADMINISTRATION</b>
<b>3 DOSAGE FORMS AND STRENGTHS</b>
<b>4 CONTRAINDICATIONS</b>
<b>5 WARNINGS AND PRECAUTIONS</b>
<b>6 ADVERSE REACTIONS</b>
<b>7 DRUG INTERACTIONS</b>
...

PI = Prescribing Information

- (1) “Old” format labeling and
- (2) Physician Labeling Rule (PLR) labeling

# “Old” Format<sup>1</sup> Labeling Sections

BOXED WARNING

DESCRIPTION

CLINICAL PHARMACOLOGY

INDICATIONS AND USAGE

CONTRAINDICATIONS

WARNINGS

**PRECAUTIONS**

ADVERSE REACTIONS

DRUG ABUSE AND DEPENDENCE

OVERDOSAGE

DOSAGE AND ADMINISTRATION

HOW SUPPLIED

1979



## Subsections in **PRECAUTIONS** Section:

General, Information for Patients, Laboratory Tests, Drug Interactions, Drug/Laboratory Test Interactions, Carcinogenesis, Mutagenesis, Impairment of Fertility, Pregnancy, Labor and Delivery, Nursing Mothers, Pediatric Use, Geriatric Use

# PLR Format<sup>2</sup>

(Full Prescribing Information Sections)

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

2006

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**

<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>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 PI 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%
<b>August 2020</b>	<b>~ 70%</b>

<sup>1</sup> PI = Prescribing Information; CDER = Center for Drug Evaluation and Research; Analyses based on Structured Product Labeling (SPL) - generally only includes marketed products; excludes labeling from repackagers, relabelers, and authorized generics

# Pregnancy, Lactation, and Females and Males of Reproductive Potential Information in Labeling<sup>1</sup>

<b>BOXED WARNING</b>
<b>1 INDICATIONS AND USAGE</b>
<b>2 DOSAGE AND ADMINISTRATION</b>
<b>3 DOSAGE FORMS AND STRENGTHS</b>
<b>4 CONTRAINDICATIONS</b>
<b>5 WARNINGS AND PRECAUTION</b>
<b>6 ADVERSE REACTIONS</b>
<b>7 DRUG INTERACTIONS</b>
<b>8 USE IN SPECIFIC POPULATIONS</b>
<b>8.1 Pregnancy</b>
<b>8.2 Labor and Delivery</b>
<b>8.3 Nursing Mothers</b>
<b>8.4 Pediatric Use</b>
<b>8.5 Geriatric Use</b>

2006



<b>BOXED WARNING</b>
<b>1 INDICATIONS AND USAGE</b>
<b>2 DOSAGE AND ADMINISTRATION</b>
<b>3 DOSAGE FORMS AND STRENGTHS</b>
<b>4 CONTRAINDICATIONS</b>
<b>5 WARNINGS AND PRECAUTIONS</b>
<b>6 ADVERSE REACTIONS</b>
<b>7 DRUG INTERACTIONS</b>
<b>8 USE IN SPECIFIC POPULATIONS</b>
<b>8.1 Pregnancy</b>
<b>8.2 Lactation</b>
<b>8.3 Females and Males of Reproductive Potential</b>
<b>8.4 Pediatric Use</b>
<b>8.5 Geriatric Use</b>

2014

Under the Pregnancy and Lactation Labeling Rule (PLLR), the pregnancy letter categories are being removed.

<sup>1</sup> 21 CFR 201.57(c)(9). See also the final rule “Content and Format of Labeling for Human Prescription Drug and Biological Products; Requirements for Pregnancy and Lactation Labeling” (79 FR 72064, December 4, 2014).





# Process for FDA Approval of Prescribing Information

# How FDA Reviews PI (1 of 2)



- If requested, FDA provides comments about drug companies' draft PI *before application or supplement submission*
- Drug company submits an application to approve a drug or a supplement to an approved drug application that includes a draft PI
- FDA reviews PI upon submission and throughout review cycle
- FDA and drug company develop final PI
  - Iterative process of communications/discussions with both parties

# How FDA Reviews PI (2 of 2)



- Final PI is approved by FDA and attached to approval letter
- PI uploaded to Drugs@FDA<sup>1</sup>
- After approval (within 14 days), drug company submits PI electronically<sup>2</sup> and PI posted on websites
- After approval, labeling is updated:
  - Drug company submits new supplement
  - FDA may contact drug company and **request** firm update PI or **require** firm update PI

PI = Prescribing Information

<sup>1</sup> Posted to Drugs@FDA as a PDF file: <sup>2</sup> Posted electronically as a Structured Product Labeling (SPL) file

# Principles of Updating PI<sup>1</sup>

(in addition to ensuring scientific accuracy)



- Ensure PI meets statutory/regulatory requirements and is consistent with final guidance recommendations<sup>2</sup>
- Ensure consistent message
- Improve organization/formatting<sup>3</sup>
- Update terminology and remove/revise outdated, misleading, or clearly inapplicable information<sup>3,4</sup>
- When updating PI, review and develop *entire* PI



<sup>1</sup> PI = Prescribing Information; Guidance for industry: [Labeling for Human Prescription Drug and Biological Products - Implementing the PLR Content and Format Requirements](#) (February 2013); <sup>2</sup> Final guidances represents the Agency's current thinking (alternative approaches are acceptable if they satisfy statutes/regulations); <sup>3</sup> If applicable; <sup>4</sup> 21 CFR 201.56(a)(2) and 21 CFR 201.56(d)(4)



# Selected Parts of the Prescribing Information

# Highlights of Prescribing Information<sup>1</sup>



## HIGHLIGHTS OF PRESCRIBING INFORMATION

These highlights do not include all the information needed to use PROPRIETARY NAME safely and effectively. See full prescribing information for PROPRIETARY NAME.

PROPRIETARY NAME (nonproprietary name) dosage form, route of administration, controlled substance symbol  
Initial U.S. Approval: YYYY

### WARNING: TITLE OF WARNING

*See full prescribing information for complete boxed warning.*

- Text (4)
- Text (5.x)

## RECENT MAJOR CHANGES

Section Title, Subsection Title (x.x) M/YYYY  
Section Title, Subsection Title (x.x) M/YYYY

## INDICATIONS AND USAGE

PROPRIETARY NAME is a (insert FDA established pharmacologic class text phrase) indicated for ... (1)

### Limitations of Use

Text (1)

## DOSAGE AND ADMINISTRATION

- Text (2.x)
- Text (2.x)

## DOSAGE FORMS AND STRENGTHS

Dosage form(s): strength(s) (3)

## CONTRAINDICATIONS

- Text (4)
- Text (4)

## WARNINGS AND PRECAUTIONS

- Text (5.x)
- Text (5.x)

## ADVERSE REACTIONS

Most common adverse reactions (incidence > x%) are text (6.x)

To report SUSPECTED ADVERSE REACTIONS, contact name of manufacturer at toll-free phone # or FDA at 1-800-FDA-1088 or [www.fda.gov/medwatch](http://www.fda.gov/medwatch).

## DRUG INTERACTIONS

- Text (7.x)
- Text (7.x)

## USE IN SPECIFIC POPULATIONS

- Text (8.x)
- Text (8.x)

See 17 for PATIENT COUNSELING INFORMATION and FDA-approved patient labeling OR and Medication Guide.

Revised: M/YYYY

<sup>1</sup> Abbreviated as “Highlights” in this presentation

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## FULL PRESCRIBING INFORMATION: CONTENTS\*

### WARNING: TITLE OF WARNING

#### 1 INDICATIONS AND USAGE

#### 2 DOSAGE AND ADMINISTRATION

2.1 Subsection Title

2.2 Subsection Title

#### 3 DOSAGE FORMS AND STRENGTHS

#### 4 CONTRAINDICATIONS

#### 5 WARNINGS AND PRECAUTIONS

5.1 Subsection Title

5.2 Subsection Title

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6.1 Clinical Trials Experience

6.2 Immunogenicity

6.2 or 6.3 Postmarketing Experience

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7.2 Subsection Title

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14.1 Subsection Title

14.2 Subsection Title

#### 15 REFERENCES

#### 16 HOW SUPPLIED/STORAGE AND HANDLING

#### 17 PATIENT COUNSELING INFORMATION

\* Sections or subsections omitted from the full prescribing information are not listed.

# Full Prescribing Information Sections



<b>BOXED WARNING</b>
<b>1 INDICATIONS AND USAGE</b>
<b>2 DOSAGE AND ADMINISTRATION</b>
<b>3 DOSAGE FORMS AND STRENGTHS</b>
<b>4 CONTRAINDICATIONS</b>
<b>5 WARNINGS AND PRECAUTIONS</b>
<b>6 ADVERSE REACTIONS</b>
<b>7 DRUG INTERACTIONS</b>
<b>8 USE IN SPECIFIC POPULATIONS</b>
<b>9 DRUG ABUSE AND DEPENDENCE</b>
<b>10 OVERDOSAGE</b>
<b>11 DESCRIPTION</b>
<b>12 CLINICAL PHARMACOLOGY</b>
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<b>14 CLINICAL STUDIES</b>
<b>15 REFERENCES</b>
<b>16 HOW SUPPLIED/STORAGE AND HANDLING</b>
<b>17 PATIENT COUNSELING INFORMATION</b>



# Highlights: Product Title<sup>1</sup>

## HIGHLIGHTS OF PRESCRIBING INFORMATION

These highlights do not include all the information needed to use PROPRIETARY NAME safely and effectively. See full prescribing information for PROPRIETARY NAME.

**PROPRIETARY NAME (nonproprietary name) dosage form, route of administration, controlled substance symbol**

Initial U.S. Approval: YYYY

### WARNING: 1

See full prescribing information

- Text (4)
- Text (5.x)

### RECENT M

Section Title, Subsection Title (x)  
Section Title, Subsection Title (x)

### INDICATI

PROPRIETARY NAME is a (ins)  
class text phrase) indicated for .

### Limitations of Use

Text (1)

### DOSAGE AND ADMINISTRATION

- Text (2.x)
- Text (2.x)

### DOSAGE FORMS AND STRENGTHS

Dosage form(s): strength(s) (3)

### CONTRAINDICATIONS

- Text (4)
- Text (4)

### WARNINGS AND PRECAUTIONS

- Text (5 x)

### REACTIONS

idence > x%) are text (6.x)

REACTIONS, contact name of  
r FDA at 1-800-FDA-1088 or

### REACTIONS

### POPULATIONS

- Proprietary Name
- Nonproprietary name
- Dosage form and/or route of administration (if not included in the nonproprietary name)
- Controlled substance symbol

See 17 for PATIENT COUNSELING INFORMATION and FDA-approved patient labeling OR and Medication Guide.

Revised: M/YYYY

<sup>1</sup> 21 CFR 201.57(a)(2); draft guidance for industry: *Product Title and Initial U.S. Approval in the Highlights of Prescribing Information for Human Prescription Drug and Biological Products — Content and Format* (January 2018) (referred to as the Draft Product Titles Guidance). When final this guidance, will represent the FDA's current thinking on this topic.



# Initial U.S. Approval



## Example #1

### **LIPITOR (atorvastatin calcium) tablets, for oral use**

Application was approved in 1996 and the **Initial U.S. Approval is 1996**

## Example #2

### **EPIPEN (epinephrine injection), for intramuscular or subcutaneous use**

Application was approved in 1987, but the **Initial U.S. Approval is 1939** because the first epinephrine product approved by the FDA in 1939

# Recent Major Changes (RMC) Heading<sup>1</sup>



**RMCs pertain to substantive labeling changes to only five sections:**

- **BOXED WARNING**
- **INDICATIONS AND USAGE**
- **DOSAGE AND ADMINISTRATION**
- **CONTRAINDICATIONS**
- **WARNINGS AND PRECAUTIONS**

## -----RECENT MAJOR CHANGES-----

Section Title, Subsection Title (x.x) M/YYYY  
Section Title, Subsection Title (x.x) M/YYYY

manufacturer at toll-free phone # or FDA at 1-800-FDA-1088 or [www.fda.gov/medwatch](http://www.fda.gov/medwatch).

## -----DRUG INTERACTIONS-----

- Text (7.x)

**Must list RMCs for at least one year after the labeling change and remove at first printing after one year**

## -----DOSAGE AND ADMINISTRATION-----

- Text (2.x)
- Text (2.x)

See 17 for PATIENT COUNSELING INFORMATION and FDA-approved patient labeling OR and Medication Guide.

Revised: M/YYYY

<sup>1</sup> 21 CFR 201.57(a)(5); Guidance for industry: *Labeling for Human Prescription Drug and Biological Products – Implementing the PLR Content and Format Requirements* (February 2013)

# Established Pharmacologic Class in Highlights

## HIGHLIGHTS OF PRESCRIBING INFORMATION

These highlights do not include all the information needed to use PROPRIETARY NAME safely and effectively. See full prescribing information for PROPRIETARY NAME.

PROPRIETARY NAME (nonproprietary name) dosage form, route of administration, controlled substance symbol  
Initial U.S. Approval: YYYY

### WARNING: TITLE OF WARNING

See full prescribing information for complete boxed warning.

- Text (4)
- Text (5.x)

## RECENT MAJOR CHANGES

Section Title, Subsection Title (x.x) M/YYYY  
Section Title, Subsection Title (x.x) M/YYYY

## INDICATIONS AND USAGE

PROPRIETARY NAME is a (insert FDA established pharmacologic class text phrase) indicated for ... (1)

### Limitations of Use

Text (1)

## DOSAGE AND ADMINISTRATION

- Text (2.x)
- Text (2.x)

## DOSAGE FORMS AND STRENGTHS

Dosage form(s): strength(s) (3)

## CONTRAINDICATIONS

- Text (4)
- Text (4)

## WARNINGS AND PRECAUTIONS

- Text (5.x)
- Text (5.x)

## ADVERSE REACTIONS

Most common adverse reactions (incidence > x%) are text (6.x)

To report SUSPECTED ADVERSE REACTIONS, contact name of manufacturer at toll-free phone # or FDA at 1-800-FDA-1088 or [www.fda.gov/medwatch](http://www.fda.gov/medwatch).

## DRUG INTERACTIONS

- Text (7.x)
- Text (7.x)

## USE IN SPECIFIC POPULATIONS

- Text (8.x)
- Text (8.x)

See 17 for PATIENT COUNSELING INFORMATION and FDA-approved patient labeling OR and Medication Guide.

Revised: M/YYYY

# Established Pharmacologic Class (EPC)<sup>1</sup>

An EPC is a term that:

- Refers to a group of active moieties that share scientifically valid properties and are clinically meaningful
- Is associated with an approved indication

Active Moiety Name	FDA EPC Phrase
Tobramycin	aminoglycoside antibacterial
Testosterone	androgen
Lisinopril	angiotensin converting enzyme inhibitor
Losartan	angiotensin II receptor blocker
Sotalol	antiarrhythmic

<sup>1</sup> *Determining the Established Pharmacologic Class for Use in the Highlights of Prescribing Information MAPP (MAPP 7400.13); guidance for industry: Labeling for Human Prescription Drug and Biological Products — Determining Established Pharmacologic Class for Use in the Highlights of Prescribing Information (October 2009)*

<sup>2</sup> 21 CFR 201.57(a)(6)

# FDA Posts EPCs<sup>1</sup>

## FDA Listing of Established Pharmacologic Class Text Phrases January 2021

Active Moiety Name	<b>FDA EPC Text Phrase</b> PLR regulations require that the following statement is included in the Highlights Indications and Usage heading if a drug is a member of an EPC [see 21 CFR 201.57(a)(6)]: “(Drug) is a (FDA EPC Text Phrase) indicated for [indication(s)].” For each listed active moiety, the associated FDA EPC text phrase is included in this document. For more information about how FDA determines the EPC Text Phrase, see the 2009 "Determining EPC for Use in the Highlights" guidance and 2013 "Determining EPC for Use in the Highlights" MAPP 7400.13.
DUTASTERIDE	5-alpha reductase inhibitor
FINASTERIDE	5-alpha reductase inhibitor
ZILEUTON	5-lipoxygenase inhibitor
BOTULINUM TOXIN TYPE A	acetylcholine release inhibitor
RIMABOTULINUMTOXINB	acetylcholine release inhibitor
GUANIDINE	acetylcholine releasing agent
DACTINOMYCIN	actinomycin
ADENOSINE	adenosine receptor agonist
REGADENOSON	adenosine receptor agonist
REGADENOSON ANHYDROUS	adenosine receptor agonist
METYRAPONE	adrenal steroid synthesis inhibitor

<sup>1</sup> See <https://www.fda.gov/media/144963/download>

# Highlights: Adverse Reactions Reporting Contact Information<sup>1</sup>



## HIGHLIGHTS OF PRESCRIBING INFORMATION

These highlights do not include all the information needed to use PROPRIETARY NAME safely and effectively. See full prescribing information for PROPRIETARY NAME.

PROPRIETARY NAME (nonproprietary name) dosage form, route of administration, controlled substance symbol  
Initial U.S. Approval: YYYY

### WARNING: TITLE OF WARNING

*See full prescribing information for complete boxed warning.*

- Text (4)
- Text (5.x)

## RECENT MAJOR CHANGES

Section Title, Subsection Title (x.x) M/YYYY  
Section Title, Subsection Title (x.x) M/YYYY

## INDICATIONS AND USAGE

PROPRIETARY NAME is a (insert FDA established pharmacologic class text phrase) indicated for ... (1)

### Limitations of Use

Text (1)

## DOSAGE AND ADMINISTRATION

- Text (2.x)
- Text (2.x)

## DOSAGE FORMS AND STRENGTHS

Dosage form(s): strength(s) (3)

## CONTRAINDICATIONS

- Text (4)
- Text (4)

## WARNINGS AND PRECAUTIONS

- Text (5.x)
- Text (5.x)

## ADVERSE REACTIONS

Most common adverse reactions (incidence > x%) are text (6.x)

**To report SUSPECTED ADVERSE REACTIONS, contact name of manufacturer at toll-free phone # or FDA at 1-800-FDA-1088 or [www.fda.gov/medwatch](http://www.fda.gov/medwatch).**

## DRUG INTERACTIONS

- Text (7.x)
- Text (7.x)

## USE IN SPECIFIC POPULATIONS

- Text (8.x)
- Text (8.x)

See 17 for PATIENT COUNSELING INFORMATION and FDA-approved patient labeling OR Medication Guide.

Revised: M/YYYY

<sup>1</sup> 21 CFR 201.57(a)(11)(ii) and guidance for industry: *Labeling for Human Prescription Drug and Biological Products – Implementing the PLR Content and Format Requirements* (February 2013)



# Highlights: Revision Date<sup>1</sup>



## HIGHLIGHTS OF PRESCRIBING INFORMATION

These highlights do not include all the information needed to use PROPRIETARY NAME safely and effectively. See full prescribing information for PROPRIETARY NAME.

PROPRIETARY NAME (nonproprietary name) dosage form, route of administration, controlled substance symbol  
Initial U.S. Approval: YYYY

### WARNING: TITLE OF WARNING

*See full prescribing information for complete boxed warning.*

- Text (4)
- Text (5.x)

## RECENT MAJOR CHANGES

Section Title, Subsection Title (x.x)	M/YYYY
Section Title, Subsection Title (x.x)	M/YYYY

## INDICATIONS AND USAGE

PROPRIETARY NAME is a (insert FDA established pharmacologic class text phrase) indicated for ... (1)

### Limitations of Use

Text (1)

## DOSAGE AND ADMINISTRATION

- Text (2.x)
- Text (2.x)

## DOSAGE FORMS AND STRENGTHS

Dosage form(s): strength(s) (3)

## CONTRAINDICATIONS

- Text (4)
- Text (4)

## WARNINGS AND PRECAUTIONS

- Text (5.x)
- Text (5.x)

## ADVERSE REACTIONS

Most common adverse reactions (incidence > x%) are text (6.x)

To report SUSPECTED ADVERSE REACTIONS, contact name of manufacturer at toll-free phone # or FDA at 1-800-FDA-1088 or [www.fda.gov/medwatch](http://www.fda.gov/medwatch).

## DRUG INTERACTIONS

- Text (7.x)
- Text (7.x)

## USE IN SPECIFIC POPULATIONS

- Text (8.x)
- Text (8.x)

See 17 for PATIENT COUNSELING INFORMATION and FDA-approved patient labeling OR and Medication Guide.

Revised: M/YYYY

<sup>1</sup> 21 CFR 201.57(a)(15) and guidance for industry: *Labeling for Human Prescription Drug and Biological Products – Implementing the PLR Content and Format Requirements* (February 2013)

# Full Prescribing Information Sections



## **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**

## **9 DRUG ABUSE AND DEPENDENCE**

## **10 OVERDOSAGE**

## **11 DESCRIPTION**

## **12 CLINICAL PHARMACOLOGY**

## **13 NONCLINICAL TOXICOLOGY**

## **14 CLINICAL STUDIES**

## **15 REFERENCES**

## **16 HOW SUPPLIED/STORAGE AND HANDLING**

## **17 PATIENT COUNSELING INFORMATION**

Sections highlighted in blue will be discussed in this webinar

# Indications and Usage (Section 1)<sup>1</sup>



Based on substantial evidence of effectiveness:

- Treatment, prevention, or diagnosis of a recognized disease or condition or manifestation of a recognized disease or condition
- Relief of symptoms associated with a recognized disease or condition

Limitations of Use include if, reasonable concern about risk-benefit profile

<sup>1</sup> 21 CFR 201.57(c)(2); draft guidance for industry: *Indications and Usage Section of Labeling for Human Prescription Drug and Biological Products — Content and Format* (July 2018). When final this guidance, will represent the FDA's current thinking on this topic.

# Dosage and Administration (Section 2)<sup>1</sup>



Include the following **dosage** information if applicable:

- Recommended starting dosage (dose and frequency), method of titration, dosage range, maximum dosage
- Dosage in specific populations (e.g., pediatrics, renal impairment)
- Dosage modifications due to drug interactions or adverse reactions
- Recommended concomitant therapy
- Discontinuation instructions

<sup>1</sup> 21 CFR 201.57(c)(3) and guidance for industry: *Dosage and Administration Section of Labeling for Human Prescription Drug and Biological Products — Content and Format* (March 2010)

# Dosage and Administration (Section 2)<sup>1</sup>



Include important **preparation** and **administration** instructions such as:

- Route(s) of administration
- Reconstitution and/or dilution instructions
- Whether oral drug should be taken with or without food
- Specific injection site(s)
- Rate of administration of intravenous products

<sup>1</sup> 21 CFR 201.57(c)(3) and guidance for industry: *Dosage and Administration Section of Labeling for Human Prescription Drug and Biological Products — Content and Format* (March 2010)

# Boxed Warning, Contraindications, and Warnings and Precautions<sup>1</sup>



## BOXED WARNING

- Contraindications or warnings about serious adverse reactions that may lead to death or serious injury

## CONTRAINDICATIONS (section 4)

- Situations for which risk from use clearly outweighs any possible benefit

## WARNINGS AND PRECAUTIONS (section 5)

- Clinically significant adverse reactions or risks

<sup>1</sup> See 21 CFR 201.57(c)(1), (5), and (6) and 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)

# Adverse Reactions (Section 6)<sup>1</sup>



- Adverse reactions are undesirable effects, reasonably associated with the use of a drug, for which there is some basis to believe there is a causal relationship to drug and occurrence of the event
  
- Typically, includes two subsections:
  - Clinical Trials Experience (from premarketing and post-marketing studies)
  - Post-marketing Experience (from domestic and foreign spontaneous adverse reactions)

<sup>1</sup> 21 CFR 201.57(c)(7) and guidance for industry: *Adverse Reactions Section of Labeling for Human Prescription Drug and Biological Products – Content and Format* (January 2006)

# Drug Interactions (Section 7)<sup>1</sup>

- Include description of clinically significant drug interactions (DI)
- Include mechanism of clinically significant DI
- Include practical instructions for preventing or managing clinically significant DI
- Do not include negative DI unless drug does not have same interaction as other drugs in class
- Do not include details of pharmacokinetic studies

If you want to learn more about drug interaction information in labeling, consider viewing an FDA webinar:

<https://www.fda.gov/about-fda/fda-pharmacy-student-experiential-program/labeling-made-simple-how-what-and-where-drug-interactions-prescribing-information>



# How Supplied/Storage and Handling (Section 16)<sup>1</sup>



- Dosage form(s) and identifying characteristics
- Strength or potency in metric system (e.g., 10 mg)
- Units in which dosage form is ordinarily available for prescribing by practitioners (e.g., bottles of 100 tablets)
- National Drug Code (NDC) number(s)
- Special handling and storage conditions (e.g., protect from light, refrigerate, do not freeze)



# Generic Drug Labeling

# Generic Drug Labeling



- Generic drug company must identify a previously approved drug [reference listed drug (RLD)] and show, among other things, that the generic drug is bioequivalent to the RLD<sup>1</sup>
- Generic drug labeling must be the “**same as**” reference listed drug (RLD) labeling except for differences due to:<sup>2</sup>
  - Omission of information protected by patent or exclusivity
  - Inactive ingredients
  - Package size
  - Manufacturer, packer, distributor information

<sup>1</sup> The generic drug and the RLD are bioequivalent if the rate and extent of absorption of the generic drug does not show a significant difference from the rate and extent of absorption of the RLD under the same conditions. See Section 505(j)(8)(B)(i) of the FD&C Act.

<sup>2</sup> If the generic drug is not the same as the RLD (i.e., different active ingredient in a fixed combination drug product, route of administration, dosage form, or strength) then the company must first obtain FDA permission via a suitability petition



# Prescription Drug Labeling Resources

# Prescription Drug Labeling Resources



- Share
- Tweet
- LinkedIn
- Email
- Print

FDA's *Prescription Drug Labeling Resources* website provides over 150 labeling resources for the Prescribing Information, FDA-approved patient labeling, and/or carton and container labeling for human prescription drugs, including biological products (including over 50 guidances with labeling content) - see [Overview of Website](#).

## Highlights of Prescribing Information: Format Sample

**HIGHLIGHTS OF PRESCRIBING INFORMATION**  
These highlights do not include all the information needed to use PROPRIETARY NAME safely and effectively. See full prescribing information for PROPRIETARY NAME.

PROPRIETARY NAME (nonproprietary name) dosage form, route of administration, controlled substance symbol  
Initial U.S. Approval: YYYY

**WARNING: TITLE OF WARNING**  
See full prescribing information for complete boxed warning.

- Text (4)
- Text (5.x)

-----**RECENT MAJOR CHANGES**-----  
Section Title, Subsection Title (x.x) M/YYYY  
Section Title, Subsection Title (x.x) M/YYYY

-----**INDICATIONS AND USAGE**-----  
PROPRIETARY NAME is a (insert FDA established pharmacologic class text phrase) indicated for ... (1)

Limitations of Use  
Text (1)

-----**DOSAGE AND ADMINISTRATION**-----  

- Text (2.x)
- Text (2.x)

-----**DOSAGE FORMS AND STRENGTHS**-----  
Dosage form(s); strength(s) (3)

-----**CONTRAINDICATIONS**-----  

- Text (4)
- Text (4)

-----**WARNINGS AND PRECAUTIONS**-----  

- Text (5.x)
- Text (5.x)

-----**ADVERSE REACTIONS**-----  
Most common adverse reactions (incidence > x%) are text (6.x)

To report SUSPECTED ADVERSE REACTIONS, contact name of manufacturer at toll-free phone # or FDA at 1-800-FDA-1088 or [www.fda.gov/medwatch](http://www.fda.gov/medwatch).

-----**DRUG INTERACTIONS**-----  

- Text (7.x)
- Text (7.x)

-----**USE IN SPECIFIC POPULATIONS**-----  

- Text (8.x)
- Text (8.x)

See 17 for PATIENT COUNSELING INFORMATION and FDA-approved patient labeling OR Medication Guide.

Revised: M/YYYY

# FDALabel: Full-Text Search of Labeling for FDA-Regulated Products<sup>1</sup>

## Labeling Types

Choose one or more: [Animal Rx](#) [Animal OTC](#) [Human Rx](#) [Human OTC](#) [Medical Device](#) [Medical Device Rx](#) [Vaccine](#)

or choose one or more from the list:

&

## Application Types or Marketing Categories

Choose one or more: [ANDA](#) [BLA](#) [NDA](#) [NDA Authorized Generic](#) [OTC Monograph Final](#) [OTC Monograph Not Final](#)

or choose one or more from the list:

&

## Product Name(s)

&

## Labeling Full Text Search

[Simple Search](#): Search for exact text using complete words/phrases (ignores non-alphanumeric characters, e.g., ignores ".", "%")

[Advanced Search](#) (from drop-down menu): Conduct a Boolean and/or partial word search

<sup>1</sup> FDALabel (<https://nctr-crs.fda.gov/fdalabel/ui/search>) contains > 130,000 SPL from human and animal drugs, unapproved homeopathic products, animal drugs, devices, dietary supplements, cosmetics, medical foods

