

# Core Launch Review Update

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# Agenda



- Background
- 5-business day core launch screening period
- Frequently Asked Questions

# Background:

## What are Advisory Submissions?



- Advisory submissions can be either voluntary or required:
  - Promotional Materials Submitted Voluntarily for Advisory Comments
    - Firms have a voluntary opportunity to submit promotional materials to OPDP for advisory comment before the dissemination or publication of those promotional materials.
  - Required Submissions
    - Some product types and/or products approved under certain pathways may be subject to a regulatory requirement to submit their promotional materials to OPDP prior to dissemination or publication (e.g., Accelerated Approval products).

# Background:



## What are Launch Advisory Submissions?

- OPDP Divides Advisory Submissions into Launch or Non-Launch:
  - Launch materials are draft promotional materials that are intended for dissemination or publication by a firm during the launch phase.
    - Voluntary Request for Advisory Launch Submission:

Applicants may voluntarily submit draft promotional materials to OPDP during the launch phase (i.e., the first 120 days that an FDA-approved product, indication, delivery system, formulation, dosage form, dosing regimen, strength, or route of administration is marketed to the public) for review and comment before dissemination or publication.
    - Required Launch Submission:

One example of a required launch submission is an Accelerated Approval Launch. Unless otherwise informed by the Agency, applicants being considered for accelerated approval must submit to the Agency, during the preapproval review period, copies of all promotional materials, including both promotional labeling and ads, intended for dissemination or publication within 120 days following marketing approval.
  - Non-Launch materials include draft promotional materials submitted to OPDP for advisory comments outside the launch phase.

# Core Launch Advisory Materials



- OPDP categorizes launch advisory materials into core and non-core launch materials.
- Section IV.C.1 of the guidance titled, “Providing Regulatory Submissions in Electronic and Non-Electronic Format—Promotional Labeling and Advertising Materials for Human Prescription Drugs” ([OPDP Electronic Submissions Guidance](#)), provides a list of what core launch materials generally include.

# Core Launch Advisory Materials

- OPDP's review and comment process on proposed core launch materials assists firms with their initial basic launch introductory messaging.
- However, some recent core launch submissions have presented challenges for OPDP and firms:
  - lengthy comment letters from OPDP delivered in a suboptimal timeframe for firms
  - highly nuanced claims and presentations that are not limited to claims based solely on the information contained in the PI, information from the registration trials, or publications directly related to those trials
  - hundreds or even thousands of pages of references, requiring extensive review and prolonged consultation

# 5-Business Day Core Launch Screening Period



- OPDP has updated our core launch review and comment process
  - Added a 5-business day core launch screening period
  - Clarified what OPDP considers to be core launch materials for purposes of its review timing
    - To be within the bounds of what OPDP intends to review under the process we describe for “core launch advisories,” those submitted materials should:
      - Be limited to claims and presentations based solely on the information contained in the PI, information from the pivotal/registration trials, or publications directly related to those trials
      - Be a true representation of the core introductory messaging for the product

## 5-Business Day Core Launch Screening Period

- Launch screening assessments confirm:
  - Core launch
  - Complete submission
  - Annotations that clearly identify the source of support for each claim
- 5-business days, starting on the business day of receipt



## 5-Business Day Core Launch Screening Period

- By the end of the 5-business day period, OPDP will notify the firm if the submission:
  - is non-core launch or non-launch
  - needs an Amendment or Reference Document as described in the [OPDP Electronic Submissions Guidance](#)
    - Amendments and Reference Documents will be assigned a new 5-business day core launch screening period once received by OPDP
  - does not include annotations that clearly identify the source of support for each claim

## 5-Business Day Core Launch Screening Period

- If no such issues are identified, the firm will not be contacted
  - Core launch review will begin on the 6<sup>th</sup> business day after the submission was received

## 5-Business Day Core Launch Screening Period



- Goals
  - Provide timely feedback to firms
  - Ensure submissions are complete and reviewable
  - Maximize use of OPDP's resources

# Frequently Asked Questions



- New FAQs have been added to the OPDP website that address the core launch review process, as well as the following:
  - What does an annotated core launch piece look like?
  - If a firm’s piece presents information not contained in the PI but that may be consistent with the PI, will OPDP consider the core launch advisory submission to be complete if it does not include a CFL analysis?
  - How do consults influence core launch advisory response times from OPDP?
  - How does OPDP prioritize the review of non-core launch materials?

# Frequently Asked Questions



- What does an annotated core launch piece look like?
  - Section VI.F.3 of the [OPDP Electronic Submissions Guidance](#) describes how to annotate promotional materials.
  - Sections VI.G.2 and VI.H of the [OPDP Electronic Submissions Guidance](#) describe annotating product labeling and references, respectively.
  - Additionally, a link to an annotated mock promotional piece is included in the FAQ on the OPDP website.

# Frequently Asked Questions



- If a firm’s piece presents information not contained in the PI but that may be consistent with the PI, will OPDP consider the core launch advisory submission to be complete if it does not include a CFL analysis?
  - Yes. A core launch advisory submission will be considered complete even if it does not include analyses of the three factors described in the guidance titled, “Medical Product Communications That Are Consistent With the FDA-Required Labeling — Questions and Answers Guidance for Industry” ([CFL Guidance](#)). However, if a sponsor chooses to submit its analysis in order to support the sponsor’s assessment that the claims and/or presentations are consistent with the FDA-approved labeling, OPDP will consider it.
  - A CFL analysis can be provided within the annotated version of the promotional piece. A mock promotional piece annotated to include a CFL analysis is linked to the FAQ on the OPDP website.
  - If a claim or presentation is supported directly by the PI, please reference or annotate to the PI.

Mock Print Ad (Annotated)

**Tradename**  
(generic name)  
60 mcg nasal spray

Treats seasonal and year-round nasal allergy symptoms in adults and children 4 years and older

**Tradename** is a prescription nasal spray that can temporarily relieve itchy, runny nose, sneezing and itchy, watery eyes from both outdoor and indoor allergies. Starts working in just 1-2 weeks!

**Tradename is:**  
• Non-drowsy

**Important Risk Information**

**DO NOT** take Tradename if you are allergic to generic name or any of the ingredients in Tradename.

**Immune System Problems.** Tradename may cause immune system problems that may increase the risk of infection. Call your healthcare provider right away if you develop any signs of infection including: fever, feeling very tired or weak, nausea, vomiting, cough, or body aches.

**Reduced adrenal function (adrenal insufficiency).** Tradename may cause adrenal insufficiency, a condition where the adrenal glands do not make enough steroid hormones. Tell your healthcare provider if you have any of the following symptoms: weakness, nausea, vomiting, or low blood pressure.

**Eye problems.** Tradename may cause irritation or glaucoma (increased pressure in your eye). You should have regular eye exams while using Tradename.

**Serious allergic reactions.** Call your healthcare provider or get medical care if you get any of the following signs of a serious allergic reaction: rash, hives, swelling of your face, mouth, and throat, breathing problems, or low blood pressure.

**Before you use Tradename,** tell your healthcare provider about all of your medical conditions, including if you have or have had: recent untreated nasal sinus, nose surgery, or nose injury; eye or vision problems including contact or glaucoma (increased pressure in your eye); tuberculosis or any untreated fungal, bacterial, or viral infections, or eye infections. Also tell your healthcare provider if you are pregnant or plan to become pregnant, are breastfeeding or plan to breastfeed.

**Common side effects of Tradename include:** infection of the nose and throat, headache, viral infection, nosebleeds, and cough.

Please see Important Information about Tradename on the next page. We are encouraged to learn negative side effects of prescription drugs in the US. Visit [www.fda.gov/medwatch](http://www.fda.gov/medwatch) or call 1-800-338-1088. See 12/2014/00000000

**Tradename**  
(generic name)  
60 mcg nasal spray

Page 1

Ref 1:  
Brown et al. 2005  
(page 2, paragraph 3,  
lines 2-7)

Annotated PI  
(page 12, section 14,  
paragraph 5, line 3)

Ref 1:  
Brown et al. 2008  
(page 6, paragraph 3,  
lines 3-4)

**CEL Analysis:**  
**Passes CPL 3-factor test**

**Factor 1:**  
Compared to the FDA-required labeling  
-Does not relate to a different indication  
-Does not relate to a patient population outside of the approved population  
-No conflict with any use limitations or directions for handling, preparing or using the product  
-No conflict with the recommended dosage or use regimen, route of administration, or strength

**Factor 2:**  
-Does not increase the potential for harm to health relative to the information in the FDA-required labeling

**Factor 3:**  
-Does not conflict with directions in the FDA-required labeling to enable the product to be safely and effectively used under the conditions represented/suggested

Ref 2:  
Lee et al. 2010  
(pg 15, § 3, lines 1-6)

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**Factor 3:**  
-Does not conflict with directions in the FDA-required labeling to enable the product to be safely and effectively used under the conditions represented/suggested

**Patient Information**  
**TRADENAME**  
**(genericname)**  
**nasal spray**

Read this Patient Information that comes with TRADENAME before you start using it and each time you get a refill. There may be new information. This Patient Information does not take the place of talking to your healthcare provider about your medical condition or treatment.

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

**TRADENAME may cause serious side effects, including:**

- **Immune system problems** that may increase the risk of infection. Call your healthcare provider right away if you develop any signs of infections including:
  - fever
  - feeling very tired or weak
  - nausea
  - vomiting
  - cough
  - body aches

**B What is TRADENAME?**

- TRADENAME is a prescription medicine used to treat seasonal and year-round nasal allergy symptoms (allergic rhinitis) in adults and children 4 years and older.
- It is not known if TRADENAME is safe or effective in children under 4 years of age.

**C Do not take TRADENAME if you are allergic to genericname or any of the ingredients in TRADENAME. See the end of this Patient Information leaflet for a complete list of ingredients in TRADENAME.**

**D Before you use TRADENAME, tell your healthcare provider about all of your medical conditions, including if you:**

- have recent or unhealed nasal sores, nasal surgery, or nasal injury,
- have or have had eye or vision problems including cataracts or glaucoma (increased pressure in your eye),
- have or have had tuberculosis or any untreated fungal, bacterial, or viral infections, or eye infections,
- are pregnant or plan to become pregnant. It is not known if TRADENAME will harm your unborn baby,
- are breastfeeding or plan to breastfeed. It is not known if TRADENAME passes into your breast milk. You and your healthcare provider should decide if you will use TRADENAME if you plan to breastfeed.

**Tell your healthcare provider about all the medicines you take** including prescription and over-the-counter medicines, vitamins, and herbal supplements.

**How should I take TRADENAME?**

- Read the Instructions for Use at the end of this leaflet for more information about the right way to use TRADENAME.
- Use TRADENAME exactly as your healthcare provider tells you to use it.
- Spray TRADENAME nasal spray into **your nose only**. Do not spray it into your eyes or mouth.
- Do not use more than your healthcare provider tells you.
- Throw away your TRADENAME bottle after using 120 sprays. Even though the bottle may not be completely empty, you may not get the correct dose of medicine.

**What are the possible side effects of TRADENAME?**

**TRADENAME may cause serious side effects including:**

See "What is the most important information I should know about TRADENAME?"

- E**
- **Reduced adrenal function (adrenal insufficiency).** TRADENAME may cause adrenal insufficiency, a condition where the adrenal glands do not make enough steroid hormone. Tell your healthcare provider if you have any symptoms of adrenal insufficiency including:
    - tiredness
    - weakness
    - nausea
    - vomiting
    - low blood pressure

- F**
- **Eye problems.** TRADENAME may cause cataracts or glaucoma (increased pressure in your eye). You should have regular eye exams while using TRADENAME.

- G**
- **Serious allergic reactions.** Call your healthcare provider or get emergency medical care if you get any of the following signs of a serious allergic reaction:
    - rash
    - hives
    - swelling of your face, mouth, and tongue
    - breathing problems
    - low blood pressure



- **Common side effects of TRADENAME include:**
  - a. infection of the nose and throat
  - b. headache
  - c. viral infection
  - d. nosebleeds
  - e. cough

These are not all the possible side effects of TRADENAME. For more information, ask your healthcare provider or pharmacist. You may report side effects to FDA at 1-800-FDA-1088.

#### How should I store TRADENAME?

- Store TRADENAME in the original container.
- Store TRADENAME at room temperature between 68°F to 77°F (20°C to 25°C).
- Keep TRADENAME and all medicines out of the reach of children.

#### General Information about the safe and effective use of TRADENAME

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

You can ask your pharmacist or healthcare provider for information about TRADENAME that is written for healthcare professionals.

#### What are the ingredients in TRADENAME?

**Active ingredient:** generic name

**Inactive ingredients:** benzalkonium chloride, dextrose, microcrystalline cellulose, phenylethyl alcohol, carboxymethylcellulose sodium, polysorbate 80, purified water

Distributed by Smith Pharmaceuticals

#### Important Notes:

- The mock annotated ad is provided for informational purposes related to the methods for annotating submissions only. This ad does not necessarily represent all of the risk or efficacy information that should be included in promotional materials in general.
- This presentation is not meant to imply that these are the only methods that may be used to annotate submissions.
- Different examples of methods for annotating have been included in the mock ad to show various ways a submission could be annotated. However, we recommend using a consistent method throughout your submission for all references included in the submission.
- This example includes one example of a reference cited in the mock ad (i.e., the annotated PPI) that is highlighted/annotated to the mock ad; it does not include examples of all the references listed in the mock ad annotations. However, all references included in the annotations, should be included with advisory submissions.
- A page number was added to the annotated version of the mock ad to improve efficiency of the review and communication of OPDP's advisory comments.
- The CFL-analyses included in the mock annotated ad are examples of how optional CFL-analyses could be included to help facilitate OPDP's review of information not contained in the FDA-required labeling for the product but that may be consistent with the FDA-required labeling for the product.
  - As a reminder, per the guidance titled, "Medical Product Communications That Are Consistent With the FDA-Required Labeling — Questions and Answers Guidance for Industry," to be truthful and non-misleading, representations or suggestions made by firms about their products need to be grounded in fact and science and presented with appropriate context. Any data, studies, or analyses relied on should be scientifically appropriate and statistically sound to support the representations or suggestions made in a CFL promotional communication.

# Frequently Asked Questions

- How do consults influence core launch advisory response times from OPDP?
  - Firms are reminded that if a launch advisory submission is designated as “core,” the 45-calendar day response goal does not include consultation time outside of OPDP.
  - Materials with claims and presentations not derived completely and directly from the FDA-required labeling for the product may require consultation with other experts within the FDA, which will result in a longer turnaround time for comments from OPDP.
  - Firms should build longer overall response times into their launch implementation plans if they ask for advisory comments on core launch materials that include such claims and presentations.

# Frequently Asked Questions

- How does OPDP prioritize the review of non-core launch materials?
  - Submissions of non-core launch materials are discussed in Section IV.C of the [OPDP Electronic Submissions Guidance](#).
  - While we understand that all materials are a priority for sponsors, OPDP considers non-core launch materials to be a lower priority than core launch materials.
  - OPDP recommends that firms apply our comments on the core launch materials to non-core launch materials.

# Summary

- 5-business day core launch screening period has been added to OPDP's core launch review process, beginning the business day of receipt.
- If core, complete, and annotated to clearly identify the source of support for each claim firms will not receive notification and the core launch advisory review will begin on the 6<sup>th</sup> business day after receipt.
- Otherwise, reasons why core launch review will not commence will be communicated to the firm before the end of the 5-business day period.

# Resources

- OPDP guidance for industry titled, “Providing Regulatory Submissions in Electronic and Non-Electronic Format — Promotional Labeling and Advertising Materials for Human Prescription Drugs” - <https://www.fda.gov/media/128163/download>
- OPDP revised draft guidance for industry titled, “Brief Summary and Adequate Directions for Use: Disclosing Risk Information in Consumer-Directed Print Advertisements and Promotional Labeling for Prescription Drugs— <https://www.fda.gov/media/70768/download>
- OPDP guidance for industry titled, “Medical Product Communications That Are Consistent With the FDA-Required Labeling — Questions and Answers”- <https://www.fda.gov/media/102575/download>
- OPDP website FAQs— <https://www.fda.gov/about-fda/center-drug-evaluation-and-research-cder/opdp-frequently-asked-questions-faqs>

# Contact Information



- For questions on the 5-business day core launch screening period, FAQs, or how to submit core launch promotional materials
  - [CDER-OPDP-RPM@fda.hhs.gov](mailto:CDER-OPDP-RPM@fda.hhs.gov)
  - [OPDPeCTD@fda.hhs.gov](mailto:OPDPeCTD@fda.hhs.gov) (eCTD and NextGen Portal Questions)



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