

Recommendations for Final Labeling Format Check Prior to End-of-Cycle Labeling Submission

Eric Brodsky, M.D.

Associate Director, Labeling Development Team, OND, CDER, FDA

Quality Check for Format/Appearance of PI



Selected Requirements of Prescribing Information (SRPI)¹



The Selected Requirements of Prescribing Information (SRPI) is a 41-item checklist of important format prescribing information (PI) items based on labeling regulations [21 CFR 201.56(d) and 201.57] and guidances. The word “must” denotes that the item is a regulatory requirement, while the word “should” denotes that the item is based on guidance. Each SRPI item is assigned with one of the following three responses:

- **NO:** The PI does not meet the requirement for this item (**deficiency**).
- **YES:** The PI meets the requirement for this item (**no deficiency**).
- **N/A:** This item does not apply to the specific PI under review (**not applicable**).

Highlights

See Appendix for a sample tool illustrating Highlights format.

HIGHLIGHTS GENERAL FORMAT

1. Highlights (HL) must be in a minimum of 8-point font and should be in two-column format, with ½ inch margins on all sides and between columns.

Comment:

2. The length of HL must be one-half page or less unless (the HL Boxed Warning does not count against the one-half page requirement).

Comment:

3. A horizontal line must separate:
 - HL from the Table of Contents (TOC), **and**
 - TOC from the Full Prescribing Information (FPI).

¹ SRPI on [PLR Requirements for Prescribing Information website](#)

Labeling Finalization During End of Review Cycle: NDA/sNDA/BLA/sBLA



Prior to sending in labeling documents to FDA at end of review cycle (after FDA and firm are close to an agreed-upon PI) recommend:

- 1) Remove annotations (e.g., in headers/footers)
- 2) If page numbers are included, ensure first page of each labeling document starts with Page #1
- 3) Remove line numbers
- 4) Ensure correct number of columns in three PI sections

¹ Labeling documents include prescribing information (PI) and FDA-approved patient labeling [Medication Guide (MG), Patient Package Insert (PPI), Instructions for Use (IFU)]

What Can be Improved?



NDA 0123456-S-030
NDA 023456-S-020
NDA 034567-S-18
FDA Draft Labeling Text 8/5/15

1.14.1.3 Page 3 of 20 Confidential

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

5
6 PROPRIETARY NAME (non-proprietary name) dosage form, route
7 of administration, controlled substance symbol
8 Initial U.S. Approval: YYYY
9

WARNING: TITLE OF WARNING

See full prescribing information for complete boxed warning.

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

10
11 -----RECENT MAJOR CHANGES-----
12 Section Title, Subsection Title (x.x) M/201Y
13 Section Title, Subsection Title (x.x) M/201Y

14
15 -----INDICATIONS AND USAGE-----
16 PROPRIETARY NAME is a (insert FDA established pharmacologic
17 class text phrase) indicated for ... (1)

18
19 Limitations of Use: Text (1)

20
21 -----DOSAGE AND ADMINISTRATION-----
22 • Text (2.x)
23 • Text (2.x)
24

25 -----DOSAGE FORMS AND STRENGTHS-----
26 Dosage form(s): strength(s) (3)

27
28 -----CONTRAINDICATIONS-----
29 • Text (4)
30 • Text (4)

31
32 -----WARNINGS AND PRECAUTIONS-----
33 • Text (5.x)
34 • Text (5.x)

35
36 -----ADVERSE REACTIONS-----
37 Most common adverse reactions (incidence > x%) are text (6.x)

38
39 To report SUSPECTED ADVERSE REACTIONS, contact name of
40 manufacturer at toll-free phone # or FDA at 1-800-FDA-1088 or
41 www.fda.gov/medwatch.

42
43 -----DRUG INTERACTIONS-----
44 • Text (7.x)
45 • Text (7.x)

46
47 -----USE IN SPECIFIC POPULATIONS-----
48 • Text (8.x)
49 • Text (8.x)

50
51 See 17 for PATIENT COUNSELING INFORMATION and
52 FDA-approved patient labeling OR Medication Guide.

Remove Annotations

NDA 0123456-S-030
NDA 023456-S-020
NDA 034567-S-18

1.14.1.3 Page 3 of 20 Confidential

FDA Draft Labeling Text 8/5/15

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 (non-proprietary 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/201Y
Section Title, Subsection Title (x.x)	M/201Y

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.

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.

Annotations Removed¹



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 (non-proprietary 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/201Y
Section Title, Subsection Title (x.x) M/201Y

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.

DRUG INTERACTIONS

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- 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/201Y

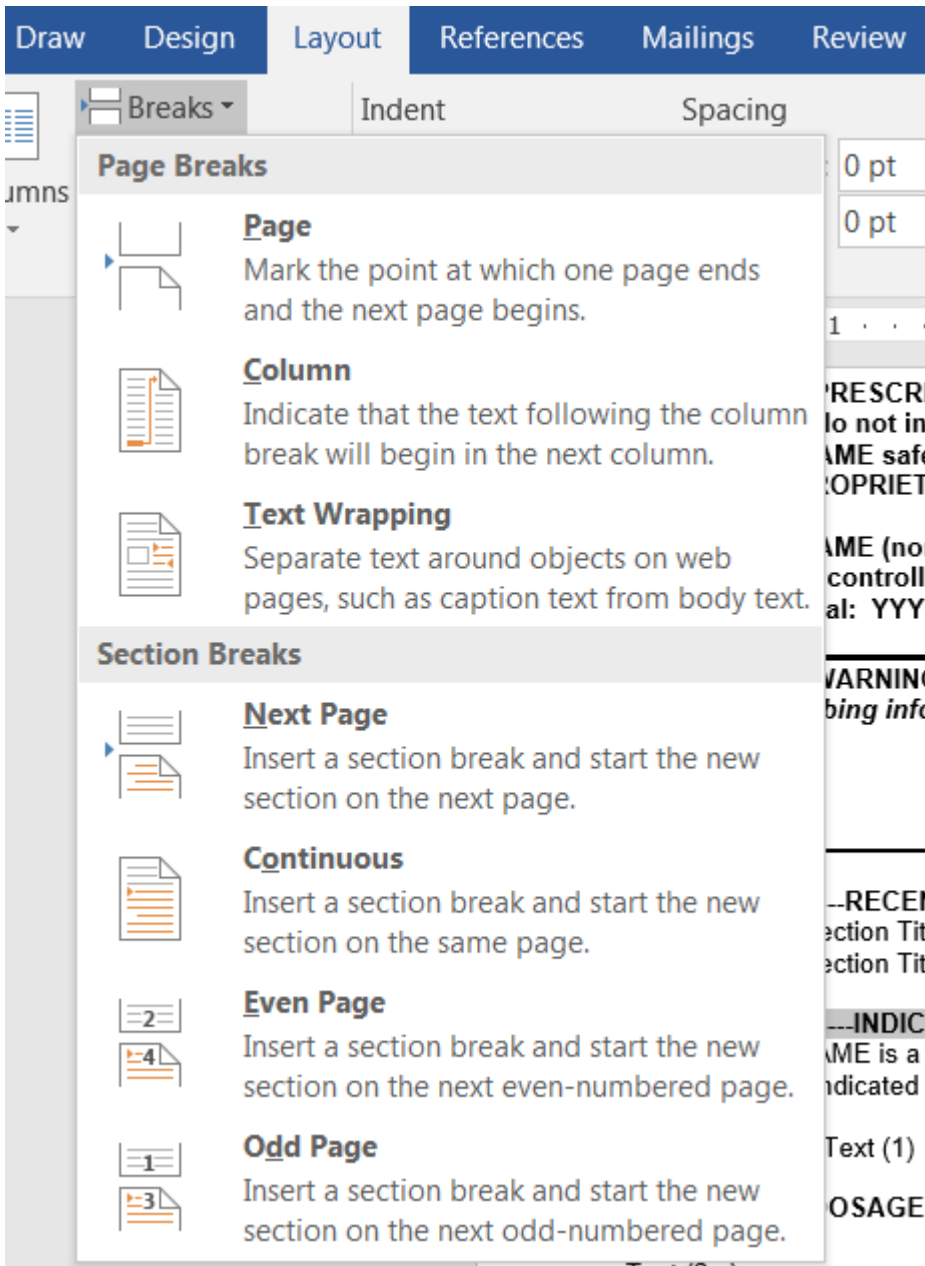
¹ “Sample PLR Template – Highlights, Contents, and Full Prescribing Information” on [PLR Requirements for Prescribing Information website](http://www.fda.gov/medwatch) 7

1) Recommend Removing Annotations

- Remove headers and footers (e.g., application numbers, product names, dosage forms, and firm names that appear in headers and footers)
 - How to remove headers/footers in labeling but retain headers/footers in cover letters to FDA - Slides #4 and #5
- May retain page numbers in labeling documents (see Slides #11-12)

How to Have Different Headers/Footers: Option #1

- Within Word document, include a section break between cover letter to FDA and labeling (under the “**Layout**” tab, click on “**Breaks**” and then select “**Next Page**”)
- Now cover letter or different labeling documents can have different formatting within same document
- Retain headers/footers in cover letter and remove headers/footers in labeling documents (except for page numbers)



How to Have Different Headers/Footers: Option #2



Two or more labeling types are two Word documents:

- Retain headers/footers in labeling document #1 and remove headers/footers in labeling document #2 (except for page numbers)
- Open up Adobe Acrobat, click on “Create ▼” tab, and then click on “Combine Files into a Single PDF...”
- Add labeling document #1 (in Word or PDF)¹ and subsequently add labeling document #2 (in Word or PDF)¹

¹ You do not need to convert labeling documents #1 and #2 to PDF (the “Combine Files into a Single PDF...” function converts Word documents into PDF and combines the files)

2) If Page Numbers are Included in Labeling Documents, Recommend First Page of Each Document Start with Page #1

- Recommend different numbering for each of labeling document (see Slides #4 or #5 to include different page numbers in footers/headers) to ensure first page of each document starts on Page #1

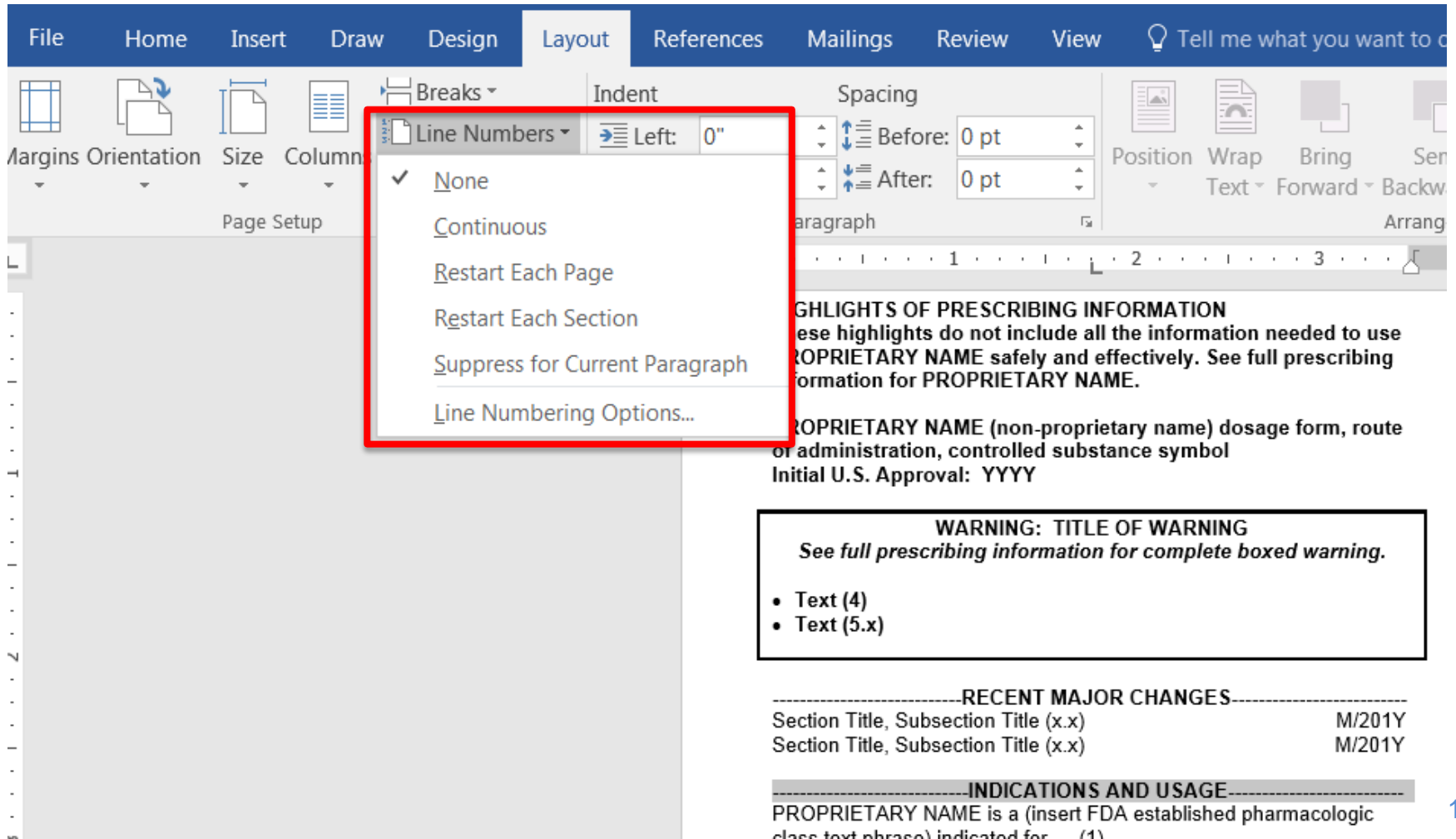
Different Page Numbers for Each Labeling Document

For example, one submitted document may be 35 pages long (25, 5, and 5 pages for PI, MG, and IFU, respectively). Ensure that:

- PI is numbered Pages 1 to 25
- MG is numbered Pages 1 to 5
- IFU is numbered Pages 1 to 5

3) Remove Line Numbers Before Attaching Labeling to Approval Letter¹

On “Layout” tab, choose “None” under the “Line Numbers” tab



The screenshot shows the Microsoft Word interface with the **Layout** tab selected. The **Line Numbers** dropdown menu is open, and the **None** option is selected, highlighted by a red box. The menu also includes options for **Continuous**, **Restart Each Page**, **Restart Each Section**, **Suppress for Current Paragraph**, and **Line Numbering Options...**. The background text is a draft of a labeling approval letter, including sections for **HIGHLIGHTS OF PRESCRIBING INFORMATION**, **WARNING: TITLE OF WARNING**, **RECENT MAJOR CHANGES**, and **INDICATIONS AND USAGE**.

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 (non-proprietary 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)

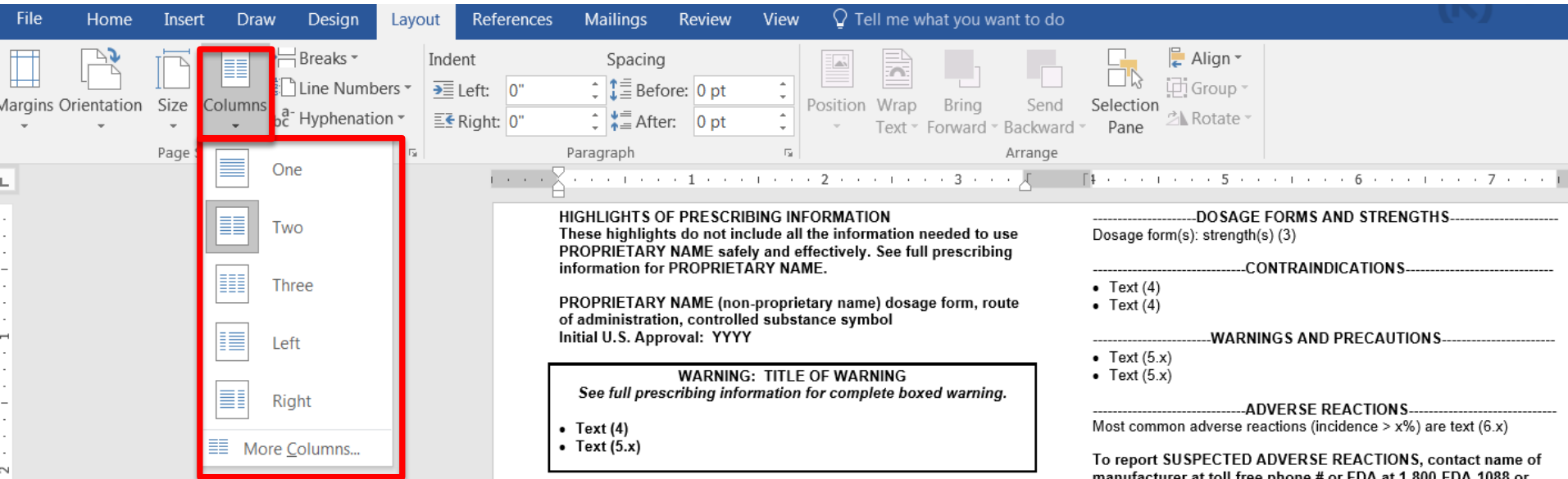
-----RECENT MAJOR CHANGES-----
Section Title, Subsection Title (x.x) M/201Y
Section Title, Subsection Title (x.x) M/201Y

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

4) Before Submitting PI: Ensure Correct Columns in PI



- Ensure two-column format for Highlights and Table of Contents¹
- Recommend one-column format for Full Prescribing Information



- Ensure appropriate section breaks (e.g. On “[Layout](#)” tab, under “[Breaks](#)▼” choose “Continuous”)
- On “[Layout](#)” tab, choose appropriate column under “[Columns](#)” tab

¹ 21 CFR 201.57(d) and Implementing the PLR Content and Format Requirements guidance

Thank you!

