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APPLICATION NUMBER:

202155Orig1s000

PROPRIETARY NAME REVIEW(S)

**Department of Health and Human Services
Public Health Service
Food and Drug Administration
Center for Drug Evaluation and Research
Office of Surveillance and Epidemiology
Office of Medication Error Prevention and Risk Management**

Proprietary Name Review--Final

Date: October 22, 2012

Reviewer: Morgan Walker, Pharm.D., M.B.A.
Division of Medication Error Prevention and Analysis

Team Leader: Irene Z. Chan, Pharm.D. BCPS
Division of Medication Error Prevention and Analysis

Drug Name and Strength(s): Eliquis (Apixaban) Tablets
2.5 mg and 5 mg

Application Type/Number: NDA 202155

Applicant: Bristol Myers Squibb

OSE RCM #: 2012-2339

*** This document contains proprietary and confidential information that should not be released to the public.***

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1 INTRODUCTION

This re-assessment of the proposed proprietary name, Eliquis (Apixaban) Tablets, 2.5 mg and 5 mg, is written in response to the anticipated approval of this NDA within 90 days from the date of this review. DMEPA found the proposed name, Eliquis, acceptable in OSE Review #2011-3807, dated December 6, 2011.

2 METHODS AND DISCUSSION

For re-assessments of proposed proprietary names, DMEPA searches a standard set of databases and information sources (see section 4) to identify names with orthographic and phonetic similarity to the proposed name that have been approved since the previous OSE proprietary name review. For this review we used the same search criteria described in OSE Review #2011-3807. We note that none of the proposed product characteristics were altered. However, we evaluated the previously identified names of concern considering any lessons learned from recent post-marketing experience, which may have altered our previous conclusion regarding the acceptability of the proposed proprietary name. Our re-evaluation did not alter our conclusion for OSE Review # 2011-3807. The searches of the databases yielded one new name ((b) (4)) thought to look or sound similar to Eliquis and represent a potential source of drug name confusion. Failure mode and effects analysis was applied to determine if the proposed proprietary name could potentially be confused with Eliquis and lead to medication errors. This analysis determined that the name similarity between Eliquis and the identified name was unlikely to result in medication error for the reasons presented in Appendix A.

Additionally, DMEPA searched the USAN stem list to determine if the name contains any USAN stems as of the last USAN updates. The Safety Evaluator did not identify any United States Adopted Names (USAN) stems in the proposed proprietary name, as of October 18, 2012. The Office of Prescription Drug Promotion (OPDP) re-reviewed the proposed name on October 18, 2012 and had no concerns regarding the proposed name from a promotional perspective.

3 CONCLUSIONS

The re-evaluation of the proposed proprietary name, Eliquis, did not identify any vulnerabilities that would result in medication errors with the additional name noted in this review. Thus, DMEPA has no objection to the proprietary name, Eliquis, for this product at this time.

DMEPA considers this a final review; however, if approval of the NDA is delayed beyond 90 days from the date of this review, the Division of Cardiovascular and Renal Products (DCRP) should notify DMEPA because the proprietary name must be re-reviewed prior to the new approval date.

If you have further questions or need clarifications, please contact Cheryle Milburn, OSE project manager, at 301-796-2084.

4 REFERENCES

1. **OSE Reviews: RCM #2011-3807.**

2. ***Drugs@FDA*** (<http://www.accessdata.fda.gov/scripts/cder/drugsatfda/index.cfm>)

Drugs@FDA contains most of the drug products approved since 1939. The majority of labels, approval letters, reviews, and other information are available for drug products approved from 1998 to the present. Drugs@FDA contains official information about FDA approved [brand name](#), [generic drugs](#), [therapeutic biological products](#), [prescription](#) and [over-the-counter](#) human drugs and [discontinued drugs](#) and “[Chemical Type 6](#)” approvals.

3. ***USAN Stems*** (<http://www.ama-assn.org/ama/pub/physician-resources/medical-science/united-states-adopted-names-council/naming-guidelines/approved-stems.page?>)

USAN Stems List contains all the recognized USAN stems.

4. ***Division of Medication Error Prevention and Analysis Proprietary Name Consultation Request***

Compiled list of proposed proprietary names submitted to the Division of Medication Error Prevention and Analysis for review. The list is generated on a weekly basis from the Access database/tracking system.

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