DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

FOI

Food and Drug Administration
Rockville MD 20857

JAN - 8 1997

TRANSMITTED VIA FACSIMILE

Heather L. Jordan
Associate Director, Regulatory Affairs
The R.W. Johnson Pharmaceutical Research Institute
Division of Ortho Pharmaceutical Corporation
Route 202 South, P.O. Box 300
Raritan, NJ 08869-0602

RE: NDAs 19-735 and 20-087
Floxin (ofloxacin tablets and injection)
MACMIS ID #5006

Dear Ms. Jordan:

Reference is made to The R.W. Johnson Pharmaceutical Research Institute's (RWJ) December 13, 1996, FDA Form 2253 submission of a Critical Care Slide Lecture Kit (08G0848) for Floxin.

The Division of Drug Marketing, Advertising and Communications (DDMAC) has reviewed this slide kit and finds it to be in violation of the Federal Food, Drug, and Cosmetic Act and the applicable regulations.

Specifically, DDMAC objects to the following:

- The slide kit is misleading because it promotes Floxin for uses that it is not approved for. Specifically, the slide kit provides information on Floxin's use in the treatment of sepsis, urosepsis, and that Floxin may have a beneficial effect on reducing the severity of effects caused by the release of endotoxins from *E coli*. These are uses for which Floxin is not indicated.

  Further, the slide kit is misleading because it fails to disclose that Floxin is not indicated for use in severe infections.

  Finally, it is misleading for RWJ to promote Floxin as being safe and effective for use in treating sepsis when patients were not included in the studies that were relied upon as evidence of Floxin's efficacy.

- The slide kit is misleading because it promotes Floxin as being safe and effective for use in children, a use that is not supported by substantial evidence. For example, slide 33 provides study information about survival of children with sepsis. However, because these data are presented in a promotional item for Floxin, it implies that Floxin is safe and effective for use in this population. Also, Floxin's approved labeling includes a warning that "the safety and efficacy of Floxin in children, adolescents...have not been established."

- The slide kit is misleading because it promotes the use of unapproved products. For example, slide 35 promotes the use of opiate antagonists and monoclonal antibodies in the treatment of sepsis. However, these products are not approved for use in the treatment of sepsis.

- The slide kit is misleading because it fails to provide any balancing information about the adverse events, risks, warnings, or precautions associated with Floxin.

- In addition, RWJ is in violation of 21 CFR § 314.81(b)(3)(i) because this slide kit was not submitted at the time of initial dissemination. According to the Form 2253, this slide kit was first disseminated in June 1996 but was submitted five months after the date of issuance.

To address these objections, DDMAC recommends that RWJ take the following actions:

1. Immediately discontinue the use of the above referenced slide kit, and any and all other promotional materials that make the same or similar claims.

2. Provide to DDMAC, in writing, RWJ's intent to comply with number one above.

3. Provide to DDMAC, in writing, RWJ's intent to comply with 21 CFR §314.81(b)(3)(i).

RWJ's response should be received by January 22, 1997. If Ortho has any questions or comments, please contact the undersigned by facsimile at (301) 594-6771, or in writing at DDMAC, HFD-40, Room 17B-20, 5600 Fishers Lane, Rockville, MD 20857.

In all correspondence related to this matter, please refer to MACMIS ID #5006, in addition to the NDA number.

Sincerely,

Russell Fleischer, PA-C, MPH
Regulatory Review Officer
Division of Drug Marketing,
Advertising and Communications

File Name: flox5006.nov

Drafted:	Fleischer	Date: 12/27/96
Comment:	Palmer	Date: 12/31/96 & 1/7/97
Revised:	Fleischer	Date: 1/8/97
Concur:	Palmer	Date: 1/7/97

CC:
HFD-40/NDA 19-735 and 20-087
HFD-40/Chron/Fleischer/Palmer
HFD-520/NDA 19-735 and 20-087
HFD-520/Hopkins

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