

## Standard Operating Procedure

### Title: Job Owners Managing “In Progress” Assets During a Prescribing Information/Med Guide Transition

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### Purpose

This document is intended to provide clear guidance on how Job Owners should handle assets that are In Progress when a new label is issued. This document replaces previous unofficial practices around criteria for the number of labels behind an asset should be annotated to, however, during review, reviewers may determine the need for the asset to be updated to the latest label.

### Scope

This SOP applies to all US Oncology branded promotional assets directed to external facing customers and assets intended for internal use that include impacted labeling information. This applies to In Progress assets aligned to an earlier product label, defined as the Prescribing Information (PI) and Medication Guide (MG) or Patient Product Information (PPI) and Selected Safety Information (SSI), that has been replaced by a new version. Assets are considered **In Progress** once content upload is requested from the agency and before the asset is Approved for Distribution. **New** assets are out of scope for this document. KEYTRUDA, including KEYTRUDA + LENVIMA combination, and WELIREG resources are in scope. Currently LYNPARZA is out of scope for this guidance. This SOP applies to annotating/referencing In Progress promotional assets during the review and regulatory submission process only; the timeline for replacing the PI/MG that is disseminated with approved promotional resources is covered under a separate process.

### Audience

The intended audience is any individual involved in the process of creating or reviewing promotional assets, including but not limited to, Job Owners, Agency Partners, Marketing, and Reviewers.

### Guiding Principles

- **New Assets:** When creating new assets, the most current PI/MG/PPI/SSI must be used.
- **Routing Full Approval Assets:** Full Approval In Progress assets annotated to a prior label may be acceptable for review if the new label does not impact the content of the asset being reviewed. During review, reviewers may determine that the asset needs to be updated to the most current label prior to approval.
- **Routing Presubmission Assets:** For best practice, accelerated approval assets that are In Progress, should be updated to the most current label prior to being submitted for review.

- However, anchoring to the prior label may be acceptable for certain In Progress assets when all the criteria below are met:
  - the content of the In Progress asset is not impacted by the changes in the most current label
  - the In Progress asset will be presubmitted within 90 days following approval of the most current label

**Examples:**

- **Example 1:** You have an asset anchored to PI 60, which was approved on 8/12/2022. Label 61 is approved on 12/19/2022 while your asset is still in-progress. You anticipate the asset to be presubmitted on 3/17/2023. It is acceptable to proceed with the asset anchored to PI 60.
- **Example 2:** You have an asset anchored to PI 60, which was approved in 8/12/2022. Label 61 is approved on 12/19/2022 while your asset is still in-progress. You anticipate the asset to be presubmitted in April. It is **NOT** acceptable to proceed with the asset anchored to PI 60; the asset must be updated to the most current label (PI 61) prior to presubmission.

**Reminder:** During the Collaborative Review Discussion, reviewers may determine the need for accelerated approval assets to be updated to the latest label, especially if multiple label changes have occurred since the asset was annotated. This is due to OPDP Review Regulations.

- Label Updates (LU)/Safety Label Updates (SLU): If an asset is part of an LU or SLU, reach out to the Oncology Promo Ops team for specific LU/SLU guidance. Otherwise, consult the guidance below.

Questions on this guidance? Contact the Oncology Promotional Operations team [[oncpromoops@merck.com](mailto:oncpromoops@merck.com)].

**How to determine if an asset must be updated to the current label:**

This SOP provides guidance for three different scenarios that may apply to your asset. Please use the below chart to determine the appropriate guidance for each scenario. Your asset is not eligible for this guidance if it does not fit into one of these scenarios.

1. **SCENARIO One: New Label DOES NOT Impact the Content** (Applies to both accelerated approval (AA) and full approval resources)
2. **SCENARIO Two: New Label Impacts the Content of the Asset AND the team would ordinarily anticipate a “Not Approved” stamp.** (Applies to both AA and full approval resources)
3. **SCENARIO Three: New Label Impacts the Content of the Asset AND the team would ordinarily anticipate approval** on the content of the asset. (Applies to both AA and full approval resources)

**Steps Job Owners should take before reviewing the scenarios:**

Function/Role	Description of Process Steps
Safety Label Team	The PI/MG WRM (with revision marks) and SSI are sent from the Safety Label Team to all Oncology Job Owners.
Job Owners	<p><b><u>Action Required from Job Owners:</u></b></p> <ol style="list-style-type: none"> <li>1. Understand which assets are In Progress, and where they are in the process.</li> <li>2. Review the PI/MG WRM and SSI and work with agency to determine if the new PI/MG/SSI changes impact the content of your In Progress assets. The WRM document is included in the email sent by the Safety Label Team.</li> <li>3. Review the three scenarios to identify which, if any, applies to the asset</li> <li>4. MANDATORY: For Scenarios 1 and 2, place a Note to Reviewers in the margin of the asset and substantiate your findings. If the asset is already routing for review, the Job Owner should add the Note to Reviewer as a comment bubble on page 1 of the asset. Use the “note to reviewers” templated language provided in each scenario. Include documentation in attachment section, when applicable: <ol style="list-style-type: none"> <li>a. Include a summary memo documenting the date and changes in the prior labels and the rationale for why there is no impact to the asset. Use the WRMs on the PI and MG to pull the changes for your summary memo.</li> <li>b. Consider adding WRM-PI/MG documents into the attachments.</li> </ol> </li> </ol> <p>JOs are expected to justify the recommendations to allow an appropriate asset to proceed under a prior label. If you cannot articulate the recommendation, it should be expected that the review team will recommend revising the asset and reannotating to the current label before returning to review again.</p> <p>During review, reviewers may determine that the asset needs to be updated to the most current label prior to review/approval/presubmission.</p>

**SCENARIO One: New Label DOES NOT Impact the Content** (Applies to both accelerated approval (AA) and full approval resources)

Function/Role	Description of Process Steps
Job Owners	<p><b>Impact:</b></p> <p>You have confirmed that the asset is <b>not</b> impacted by the new label and will continue routing for review regardless of whether you anticipate an Approved for Production or Not Approved stamp.</p> <p><b>Agenda:</b></p>

	<p>Maintain the asset on the review team agenda and/or on its presubmission schedule if applicable.</p> <p><b>Note to Reviewers:</b> Recommended language for Job Owners to place on the asset as a marginal note: <i>“Note to Reviewers, this asset is aligned to PI X/MG X (date). There are no changes that impact the content of this asset based on the current label, PI Y/MG Y (date). My recommendation is to keep the asset annotated to PI X/MG X and not re-annotate to new label for the next upload.</i></p> <p><b><i>Additional Information for Accelerated Approval assets:</i></b> <i>Although content is not impacted by the current label, assets annotated to a previous label, with an expected presubmission date 90 days or more from when the new label was issued, will need to be reannotated to the most current label. If it is determined the asset should be annotated to the most current label, update the annotations, and reroute to One Review team appropriately. See Guiding Principles for more guidance.</i></p> <p><b>Discussion During Review: -</b> During review Job Owners should be prepared to have an informed discussion with the review team. The Job Owner should:</p> <ul style="list-style-type: none"><li>• Inform reviewers they followed the guidance provided in this document</li><li>• Call attention to the Note to Reviewers and read the note out loud</li><li>• Be prepared to articulate why this asset is not impacted by the recent label updates. Job Owner may need to direct reviewers to the WRM labeling or Summary Memo in Attachments to help make the case. <b>Reminder:</b> During review, reviewers may determine that the asset needs to be updated to the most current label prior to review/approval/presubmission.</li></ul>
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<p><b>SCENARIO Two: New Label Impacts the Content of the Asset</b> AND the team would <b>ordinarily anticipate a “Not Approved” stamp.</b> (Applies to both AA and full approval resources)</p> <p>A Job Owner may want to get feedback from the review team when significant comments and revisions are anticipated, with the understanding that the asset will need to be reworked and reannotated to a new label.</p>	
<b>Function/Role</b>	<b>Description of Process Steps</b>

Job Owners	<p><b>Impact:</b> You have confirmed that the asset is impacted by the new label and will continue routing for review.</p> <p><b>Agenda:</b> Maintain the asset on the review team agenda and update on its presubmission schedule if applicable. GMIS and Indegene review of PI/MG is no longer needed, however GMIS and Indegene (if applicable) review may be needed for other scientific/medical content not annotated to the PI/MG.</p> <p><b>Note to Reviewers:</b> Recommended language for Job Owners to place on the asset as a marginal note: <i>“Note to reviewers: This asset was previously uploaded under PI X/MG X. Upon the next upload, it will be updated and re-annotated to PI Y/MG Y to account for [insert language e.g., “new indication (tumor)” or “new safety language (description)”]. GMIS and Indegene review of the PI/MG annotations is not required since annotations will be updated with the new labeling before the next review] [Provide any additional context to explain what feedback you are seeking on the content]”</i></p> <p><b>Discussion During Review: -</b> During review, Job Owners should be prepared to have an informed discussion with the review team. The Job Owner should:</p> <ul style="list-style-type: none"> <li>• Inform reviewers they followed the guidance provided in this document</li> <li>• Call attention to the Note to Reviewers and read the note out loud</li> <li>• Discuss if the Not Approved disposition requires additional upload timing</li> <li>• Reminder: The asset MUST be updated to the latest label before rerouting.</li> <li>• Discuss with GMIS if Indegene Fact Checkers should be included in next review</li> </ul>
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**SCENARIO Three: New Label Impacts the Content of the Asset** AND the team would **ordinarily anticipate approval** on the content of the asset. (Applies to both AA and full approval resources)

Function/Role	Description of Process Steps
Job Owners	<p><b>Impact:</b> You have confirmed that the asset is impacted by the label update; stop the asset where it is in the process and work to have the asset updated and re-annotated to the new label prior to re-routing for review.</p>
Job Owner, Central Planner	<p><b>Agenda:</b> <b>If the asset is <u>already</u> on a published agenda for review</b>, the asset should be pulled from agenda to be updated to the most current label. You must inform the <b>central planner</b> when an asset needs to be removed from the agenda. Any pre-review comments made by reviewers should be incorporated into the next upload with lavender boxes (or comment bubbles if content is not revised).</p> <p><b>If the asset <u>is not</u> on a published agenda</b>, you should ensure that the asset is updated to the most current label before scheduling.</p>
Job Owners	<p><b>Note to Reviewers:</b> Since the asset has been pulled off the agenda, adding a note to reviewers is not applicable.</p> <p><b>Discussion During Review:</b> Since the asset has been pulled off the agenda and will be re-annotated to the most current label, content updates, if applicable, need to be highlighted using lavender or red boxing for review.</p> <p><b>Additional Information for <u>Presubmission Considerations</u>:</b></p> <p>If the asset was already approved by the review team and on the pre-submission schedule, notify the presubmission team to pull the asset off the schedule, have the agency update the asset and then re-route it for review again and schedule for a later pre-submission date.</p> <p>If the impacted asset has already been presubmitted and or ready for post-binder routing, it may need to be updated. Follow applicable SLU or LU guidance from Promo Ops.</p>