Compton, Kimberly

From: Compton, Kimberly
Sent: Friday, February 20, 2009 4:43 PM
To: 'David T. Wright'
Subject: Update on Onsolis Rvw

Hi Dave,

The team met on Onsolis this afternoon and as a result we have some information to share on the review and, as promised in my email yesterday, I wanted to share this with you directly.

Please share the below issues with the appropriate members of your team and get back to us on them as soon as you're able.

1. Regarding the physician knowledge test at registration, we note your response; however, we feel that a test should be incorpoated, even with the removal of possible sale rep involvement because the test is important to demonstrate understanding of the material presented.

2. BDSI should explore how ONSOLIS could be made available to inpatient hospice patients.

Thanks and please let me know if any questions, etc.
Kim

Kimberly Compton
Kimberly Compton, R.Ph.
Regulatory Project Manager
Division of Anesthesia, Analgesia and
Rheumatology Products (HFD-170)
301-796-1191

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

Kimberly Compton
4/8/2009 03:15:50 PM
CSO

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville, MD 20857

BioDelivery Sciences International, Inc.
801 Corporate Center Drive
Suite 210
Raleigh, NC 27607

Attention: David T. Wright, PhD, RAC
Director, Regulatory Affairs

Dear Dr. Wright:

Please refer to your new drug application (NDA) for Onsolis (fentanyl buccal soluble film).

This letter is to inform you that the Agency has determined certain opioid products, including Onsolis, will be required to have Risk Evaluation and Mitigation Strategies (REMS), to ensure that the benefits of the drugs continue to outweigh the risks of: 1) use of certain opioid products in non-opioid-tolerant individuals; 2) abuse; and 3) overdose, both accidental and intentional. The REMS will include elements to assure safe use to ensure that prescribers, dispensers, and patients are aware of and understand the risks and appropriate use of these products.

We are mindful of the provisions in FDAAA that state that elements to assure safe use must be, among other things, commensurate with the specific serious risk listed in the labeling of the drug, not be unduly burdensome on patient access to the drug, and be designed to be compatible with established distribution, procurement, and dispensing systems. We are also aware that, with limited exceptions, FDAAA requires generic and innovator products to use a single shared system to implement the elements to assure safe use.

We recognize that putting together a workable REMS for these widely prescribed products will present certain challenges, and we have decided to invite all affected sponsors to a meeting to discuss how such a program can best be designed to manage the risks. We will also discuss what we see are the next steps in developing a REMS for this class of drugs.

The meeting will be held on March 3, 2009, at 3:30 PM at 10903 New Hampshire Avenue, Silver Spring, MD 20993, Building 22. Please send no more than two representatives from your company and arrive at least 30 minutes prior to the scheduled start of the meeting to allow time to be processed through security.

Please provide Lisa Basham with a list of those attending (lisa.basham@fda.hhs.gov). Contact Lisa Basham at 301-796-1175 with any questions pertaining to this meeting.

If you have any other questions pertaining to this application, call Kimberly Compton, Regulatory Project Manager, at 301-796-1191.

Sincerely,

{See appended electronic signature page}

Bob A. Rappaport, MD
Director
Division of Anesthesia, Analgesia and
Rheumatology Products
Office of Drug Evaluation II
Center for Drug Evaluation and Research

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

Bob Rappaport
2/18/2009 02:21:04 PM

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville, MD 20857

NDA 22-266

BioDelivery Sciences International, Inc.
801 Corporate Center Drive
Suite 210
Raleigh, NC 27607

Attention: David T. Wright, PhD, RAC
Director, Regulatory Affairs

Dear Dr. Wright:

We acknowledge receipt on December 12, 2008, of your December 9, 2008, resubmission to your new drug application for ONSOLIS (fentanyl buccal soluble film) 200, 400, 600, 800, and 1200 mcg.

We consider this a complete, Class 2 response to our August 25, 2008, action letter. Therefore, the user fee goal date is June 12, 2009.

All applications for new active ingredients, new dosage forms, new indications, new routes of administration, and new dosing regimens are required to contain an assessment of the safety and effectiveness of the product in pediatric patients unless this requirement is waived or deferred. We note that you have not fulfilled the requirements. We acknowledge receipt of your request for a waiver of pediatric studies in children [redacted] of age and younger for this application. In addition, we acknowledge receipt of your request for a deferral of pediatric studies in children 3 to 17 years of age for this application. b(4)

If you have any questions, call me at 301-796-1191.

Sincerely,

{See appended electronic signature page}

Kimberly Compton, R.Ph.
Regulatory Project Manager
Division of Anesthesia, Analgesia and
Rheumatology Products
Office of Drug Evaluation II
Center for Drug Evaluation and Research

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

Kimberly Compton
12/22/2008 09:42:14 PM

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service
Food and Drug Administration
Rockville, MD 20857

NDA 22-266

BioDelivery Sciences International, Inc.
801 Corporate Center Drive
Suite 210
Raleigh, NC 27607

Attention: David T. Wright, PhD, RAC
Director, Regulatory Affairs

Dear Dr. Wright:

Please refer to your New Drug Application (NDA) submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Onsolis (fentanyl buccal soluble film).

We also refer to the meeting between representatives of your firm and the FDA on November 17, 2008. The purpose of the meeting was to provide you with feedback on the questions in your October 23, 2008, meeting package which were specifically related to your preparations for **submission of a response to the Agency's C**omplete Response Letter dated August 25, 2008.

The official minutes of that meeting are enclosed. You are responsible for notifying us of any significant differences in understanding regarding the meeting outcomes.

If you have any questions, call me at 301-796-1191.

Sincerely,

{See appended electronic signature page}

Kimberly Compton, R.Ph.
Regulatory Project Manager
Division of Anesthesia, Analgesia and
Rheumatology Products
Office of Drug Evaluation II
Center for Drug Evaluation and Research

Enclosure

MEETING MINUTES

Meeting Date: November 17, 2008
Time: 11:00 AM EST
Location: White Oak, Building 22, Conference Room 1313
Application: NDA 22-266
Regulatory Status: Complete Response Letter issued in 1st Review Cycle
Product: ONSOLIS (fentanyl buccal soluble film)
Proposed Indication: the management of breakthrough pain in patients with cancer, 18 years of age and older, who are already receiving and who are tolerant to opioid therapy for their underlying persistent cancer pain.
Sponsor: BioDelivery Sciences International, Inc. (BDSI)
Type of Meeting: Type A- Post-Action Meeting
Meeting Chair: Sharon Hertz, M.D., Director
Division of Anesthesia, Analgesia and Rheumatology Products (DAARP)
Minutes Recorder: Kimberly Compton, Project Manager, DAARP

BDSI Representatives	Title
David T Wright, Ph.D., RAC	Director, Regulatory Affairs, BDSI
Andrew L Finn, Pharm.D.	Executive Vice President, Clinical Product Development, BDSI
David Blum, M.D.	Vice President, Clinical Research and Medical Affairs, BDSI
Mark A Sirgo, Pharm.D.	President and Chief Executive Officer, BDSI
[redacted]	[redacted]
[redacted]	[redacted]
Harry J Sacks, M.D.	Vice President, Medical and Scientific Affairs, Meda Pharmaceuticals Inc.
Richard N Spivey, Pharm.D., Ph.D.	Vice President, Development Meda Pharmaceuticals Inc.
[redacted]	[redacted]

b(4)

b(4)

FDA	Title
Bob Rappaport, M.D.	Director, Division of Anesthesia, Analgesia, and Rheumatology Products (DAARP)
Sharon Hertz, M.D.	Deputy Director, DAARP
Ellen Fields, M.D., M.P.H.	Medical Team Leader, DAARP
Mary Willy, Ph.D.	Acting Team Leader, Risk Management Analysts, Division of Risk Management (DRISK), Office of Surveillance and Epidemiology (OSE)
Kristina Arnwine, Pharm.D.	Team Leader, Division of Medication Error Prevention and Analysis (DMEPA), OSE
Afrouz Nayernama, PharmD	Safety Evaluator, Division of Pharmacovigilance (DPV) I, OSE
Agnes Plante	Office of Compliance (OC)
Michelle Marsh	OC
LT Mathilda Fienkeng, Pharm.D.	Senior Regulatory Review Officer, Division of Drug Marketing, Advertising and Communication (DDMAC)
Kathleen Frost	OSE
Kim Compton	Regulatory Project Manager, DAARP

Meeting Objective:
To provide the sponsor with feedback on the questions in their October 23, 2008, meeting package which were specifically related to their preparations for submission of a response to the Agency's Complete Response Letter dated August 25, 2008.

Background:
On November 12, 2008 (prior to the November 17, 2008 meeting) the Agency forwarded to the firm the Agency's comments and responses to the questions posed by the sponsor in their October 23, 2008, meeting package. The sponsor requested further discussion of questions 1, 3, 4, 6, 7, 9, and 12.

Presented below are the Agency's November 12, 2008, comments and responses to questions in the background meeting package as well as a summary of relevant discussion that took place at the meeting itself. The sponsor's questions are listed in *italics*, with Agency responses and comments in **bold**. Discussion that took place at the meeting is captured in normal text following the question to which it pertains.

Meeting:

Statement provided by Agency in November 12, 2008 written reply—

> **The comments below are preliminary thoughts and suggestions based on the meeting package provided and current REMS thinking. Once the actual REMS is formally submitted, it will be reviewed by a large, multidisciplinary team within the Agency generating a more critical, thorough, and comprehensive review. As REMS evolves, further advice will be provided.**
>
> **The proposal submitted contains details that are appropriate for the REMS Supporting Document which includes a thorough explanation of the rationale for, and supporting information about, the content of the Proposed REMS. We suggest that your REMS submission contain two parts, the Proposed REMS template and REMS Supporting Document. Please refer to Appendix A for a suggested template and format for the REMS template and Supporting Document.**

Discussion
The sponsor indicated that if ONSOLIS is approved, Meda Pharmaceuticals would be BDSI's commercial partner responsible for marketing the product.

The sponsor introduced the dispensing plan for their product under the REMS, explaining that [redacted] b(4)

[redacted] Retail pharmacies such as CVS will not be able to purchase or dispense ONSOLIS under this program. The sponsor also stated that they [redacted] b(4)