



NDA 09218/S-107

**SUPPLEMENT APPROVAL**

Bristol-Myers Squibb Company  
Attention: Mary Christian, Pharm. D., MBA  
Executive Director, Reg Strategy Mature Products  
P.O. Box 4000  
Princeton, NJ 08543-4000

Dear Dr. Christian:

Please refer to your Supplemental New Drug Application (sNDA) dated May 18, 2009, received May 18, 2009, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Coumadin<sup>®</sup> (Warfarin Sodium).

We acknowledge receipt of your amendments dated August 20, 2009; November 12, 2010; January 28, March 18, July 15, and 21, and September 15, 2011.

The November 12, 2010, submission constituted a complete response to our November 13, 2009, action letter.

This "Prior Approval" supplemental new drug application proposes revisions to reformat the package insert in accordance with 21 CFR 201.57.

We have completed our review of this supplemental application, as amended. It is approved, effective on the date of this letter, for use as recommended in the enclosed, agreed-upon labeling text and with the minor editorial revisions listed below:

- Addition of the *month revised* in the highlights section of the full prescribing information
- Correction of the *drug name* in the last sentence in the first paragraph under *2.1 Individualized Dosing*
- Revision of the *cross-reference* (from 2.9 to 2.8) after the last sentence in the first paragraph in *2.4 Monitoring to Achieve Optimal Anticoagulation*
- Revision of the *cross-reference* (from 5.7 to 5.6) after the last sentence in the first paragraph in *4 CONTRAINDICATIONS*
- Revision of the word *label* to *labeling* in the first sentence of the first paragraph in *6 ADVERSE REACTIONS*.

We are waiving the requirements of 21 CFR 201.57(d)(8) regarding the length of Highlights of prescribing information. This waiver applies to all future supplements containing revised labeling unless we notify you otherwise.

### **CONTENT OF LABELING**

As soon as possible, but no later than 14 days from the date of this letter, submit the content of labeling [21 CFR 314.50(l)] in structured product labeling (SPL) format using the FDA automated drug registration and listing system (eLIST), as described at <http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm>. Content of labeling must be identical to the enclosed labeling (text for the package insert, Medication Guide), with the addition of any labeling changes in pending “Changes Being Effected” (CBE) supplements, as well as annual reportable changes not included in the enclosed labeling.

Information on submitting SPL files using eLIST may be found in the guidance for industry titled “SPL Standard for Content of Labeling Technical Qs and As” at <http://www.fda.gov/downloads/DrugsGuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf>.

The SPL will be accessible from publicly available labeling repositories.

Also within 14 days, amend all pending supplemental applications for this NDA, including CBE supplements for which FDA has not yet issued an action letter, with the content of labeling [21 CFR 314.50(l)(1)(i)] in MS Word format, that includes the changes approved in this supplemental application, as well as annual reportable changes and annotate each change. To facilitate review of your submission, provide a highlighted or marked-up copy that shows all changes, as well as a clean Microsoft Word version. The marked-up copy should provide appropriate annotations, including supplement number(s) and annual report date(s).

### **PROMOTIONAL MATERIALS**

You may request advisory comments on proposed introductory advertising and promotional labeling. To do so, submit the following, in triplicate, (1) a cover letter requesting advisory comments, (2) the proposed materials in draft or mock-up form with annotated references, and (3) the package insert(s) to:

Food and Drug Administration  
Center for Drug Evaluation and Research  
Division of Drug Marketing, Advertising, and Communications  
5901-B Ammendale Road  
Beltsville, MD 20705-1266

You must submit final promotional materials and package insert(s), accompanied by a Form FDA 2253, at the time of initial dissemination or publication [21 CFR 314.81(b)(3)(i)]. Form FDA 2253 is available at <http://www.fda.gov/opacom/morechoices/fdaforms/cder.html>; instructions are provided on page 2 of the form. For more information about submission of promotional materials to the Division of Drug Marketing, Advertising, and Communications (DDMAC), see <http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm>.

All promotional materials that include representations about your drug product must be promptly revised to be consistent with the labeling changes approved in this supplement, including any new safety information [21 CFR 314.70(a)(4)]. The revisions in your promotional materials should include prominent disclosure of the important new safety information that appears in the revised package labeling. Within 7 days of receipt of this letter, submit your statement of intent to comply with 21 CFR 314.70(a)(4) to the address above or by fax to 301-847-8444.

### **REPORTING REQUIREMENTS**

We remind you that you must comply with reporting requirements for an approved NDA (21 CFR 314.80 and 314.81).

If you have questions, contact Marcus Cato, Regulatory Project Manager, at (301) 796-3903.

Sincerely,

*{See appended electronic signature page}*

Ann T. Farrell, M.D.  
Director (Acting)  
Division of Hematology Products  
Office of Hematology and Oncology Products  
Center for Drug Evaluation and Research

ENCLOSURE(S):  
Content of Labeling

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**This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.**  
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/s/  
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ANN T FARRELL  
10/04/2011