Dear Mr. Rao:

Please refer to your Supplemental New Drug Applications (sNDAs) dated August 16, 2010, received August 17, 2010, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for VIRAMUNE (nevirapine) Oral Suspension, 50 mg/5 mL and VIRAMUNE (nevirapine) Tablets, 200 mg.

We acknowledge receipt of your amendments dated September 2, 2010 and September 17, 2010 and your risk evaluation and mitigation strategy (REMS) assessment dated December 17, 2009. These “Prior Approval” supplemental new drug applications provide revisions to the Medication Guide based on your first assessment of Viramune (nevirapine) REMS dated December 17, 2009, and modification to the approved REMS.

We have completed our review of these supplemental applications, as amended. They are approved, effective on the date of this letter, for use as recommended in the enclosed, agreed-upon labeling text.

**CONTENT OF LABELING**

As soon as possible, but no later than 14 days from the date of this letter, submit, using the FDA automated drug registration and listing system (eLIST), the content of labeling [21 CFR 314.50(l)] in structured product labeling (SPL) format, as described at [http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm](http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm), that is identical to the enclosed labeling (text for the package insert and Medication Guide) and include the labeling changes proposed in any pending “Changes Being Effected” (CBE) supplements and any 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
The SPL will be accessible from publicly available labeling repositories.

Also within 14 days, amend all pending supplemental applications for these NDAs, 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.

We request that the labeling approved today be available on your website within 10 days of receipt of this letter.

**RISK EVALUATION AND MITIGATION STRATEGY REQUIREMENTS**

The REMS for Viramune (nevirapine) Oral Suspension and Viramune (nevirapine) Tablets was originally approved on June 24, 2008 and a REMS modification was approved on July 20, 2010. The REMS consists of a Medication Guide and a timetable for submission of assessments of the REMS. Your proposed modification to the REMS consists of a revised Medication Guide based on your first assessment of the Viramune (nevirapine) REMS.

Your proposed modified REMS, submitted on September 17, 2010, and appended to this letter, is approved.

The timetable for submission of assessments of the REMS will remain the same as that approved on June 24, 2008.

There are no changes to the REMS assessment plan described in our April 7, 2009 communication.

We remind you that assessments of an approved REMS must include, under section 505-1(g)(3)(B) and (C), information on the status of any postapproval study or clinical trial required under section 505(o) or otherwise undertaken to investigate a safety issue. With respect to any such postapproval study, you must include the status of such study, including whether any difficulties completing the study have been encountered. With respect to any such postapproval clinical trial, you must include the status of such clinical trial, including whether enrollment has begun, the number of participants enrolled, the expected completion date, whether any difficulties completing the clinical trial have been encountered, and registration information with respect to requirements under subsections (i) and (j) of section 402 of the Public Health Service Act. You can satisfy these requirements in your REMS assessments by referring to relevant information included in the most recent annual report required under section 506B and 21 CFR 314.81(b)(2)(vii) and including any material or significant updates to the status information since the annual report was prepared. Failure to comply with the REMS assessments provisions in section 505-1(g) could result in enforcement action.
We also remind you that in addition to the assessments submitted according to the timetable included in the approved REMS, you must submit a REMS assessment and may propose a modification to the approved REMS when you submit a supplemental application for a new indication for use as described in section 505-1(g)(2)(A) of FDCA.

If you currently distribute or plan to distribute an authorized generic product under these NDAs, you will also need to submit a REMS, REMS supporting document, and any required appended documents for that authorized generic, to these NDAs. In other words, you must submit a complete proposed REMS that relates only to the authorized generic product. Review and approval of the REMS is required before you may market your product.

Prominently identify the submission containing the REMS assessments or proposed modifications with the following wording in bold capital letters at the top of the first page of the submission as appropriate:

NDA 20636 or NDA 20933 REMS ASSESSMENT
NEW SUPPLEMENT FOR NDA 20636 or NDA 20933
PROPOSED REMS MODIFICATION
REMS ASSESSMENT
NEW SUPPLEMENT (NEW INDICATION FOR USE)
FOR NDA 20636 or NDA 20933
REMS ASSESSMENT
PROPOSED REMS MODIFICATION (if included)

If you do not submit electronically, please send 5 copies of REMS-related submissions.

**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](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 products must be promptly revised to be consistent with the labeling changes approved in these supplements, 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.

**LETTERS TO HEALTH CARE PROFESSIONALS**

If you decide to issue a letter communicating important safety-related information about this drug product (i.e., a “Dear Health Care Professional” letter), we request that you submit, at least 24 hours prior to issuing the letter, an electronic copy of the letter to these NDAs to CDERMedWatchSafetyAlerts@fda.hhs.gov and to the following address:

MedWatch Program  
Office of Special Health Issues  
Food and Drug Administration  
10903 New Hampshire Ave.  
Building 32, Mail Stop 5353  
Silver Spring, MD 20993

**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 any questions, call Amalia Himaya, Regulatory Project Manager, at (301) 796-3391 or the Division’s main number at (301) 796-1500.

Sincerely,

{See appended electronic signature page}

Debra Birnkrant, M.D.  
Director  
Division of Antiviral Products  
Office of Antimicrobial Products  
Center for Drug Evaluation and Research

ENCLOSURES:  
REMS  
Content of Labeling

Reference ID: 2888442
This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

KENDALL A MARCUS
01/07/2011