



DEPARTMENT OF HEALTH AND HUMAN SERVICES

Food and Drug Administration
Silver Spring MD 20993

NDA 203045

NDA APPROVAL

Merck Sharp & Dohme Corp.
Attention: Robert A. Fromtling, Ph.D.
Director, Worldwide Regulatory Affairs
126 E. Lincoln Avenue
P.O. Box 2000, RY 33-212
Rahway, NJ 07065-0900

Dear Dr. Fromtling:

Please refer to your New Drug Application (NDA) dated and received June 30, 2011, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for ISENTRESS (raltegravir) 100 mg scored and 25 mg chewable tablets.

We acknowledge receipt of your amendments dated July 14, July 21, August 25, August 26, September 12, September 29, October 4, October 5, November 15, November 16, 2011, December 1, 2011, December 9, 2011 and December 20, 2011.

This new drug application provides for the use of ISENTRESS (raltegravir) chewable tablets in combination with other antiretroviral agents for the treatment of HIV-1 infection in pediatric patients 2 to less than 12 years of age.

We have completed our review of this application, as amended. It is approved, effective on the date of this letter, for use as recommended in the enclosed agreed-upon labeling text.

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, text for the patient package insert), 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).

CARTON AND IMMEDIATE CONTAINER LABELS

Submit final printed carton and container labels that are identical to the enclosed carton and immediate container labels, as soon as they are available, but no more than 30 days after they are printed. Please submit these labels electronically according to the guidance for industry titled “Providing Regulatory Submissions in Electronic Format – Human Pharmaceutical Product Applications and Related Submissions Using the eCTD Specifications (June 2008).” Alternatively, you may submit 12 paper copies, with 6 of the copies individually mounted on heavy-weight paper or similar material. For administrative purposes, designate this submission “**Final Printed Carton and Container Labels for approved NDA 203045.**” Approval of this submission by FDA is not required before the labeling is used.

Marketing the product(s) with FPL that is not identical to the approved labeling text may render the product misbranded and an unapproved new drug.

REQUIRED PEDIATRIC ASSESSMENTS

Under the Pediatric Research Equity Act (PREA) (21 U.S.C. 355c), all applications for new active ingredients, new indications, new dosage forms, new dosing regimens, or new routes of administration are required to contain an assessment of the safety and effectiveness of the product for the claimed indication(s) in pediatric patients unless this requirement is waived, deferred, or inapplicable.

We are waiving the pediatric study requirement with the chewable tablets for ages 12 to 18 years because the product does not represent a meaningful therapeutic benefit over existing therapies (film-coated tablets) for pediatric patients in this age group **and** is not likely to be used in a substantial number of pediatric patients in this group.

We are deferring submission of your pediatric studies for ages 0 to 23 months of age for this application because this product is ready for approval for use in pediatric subjects 2 to less than

12 years of age and the pediatric studies in the remaining pediatric populations have not been completed.

Your deferred pediatric studies required by section 505B(a) of the Federal Food, Drug, and Cosmetic Act are required postmarketing studies. The status of these postmarketing studies must be reported annually according to 21 CFR 314.81 and section 505B(a)(3)(B) of the Federal Food, Drug, and Cosmetic Act. The required studies are listed below.

1846-1 Deferred pediatric study under PREA for the treatment of HIV-1 infection in pediatric subjects from ages 0 to <4 weeks of age. The study will determine the safety, antiviral activity and pharmacokinetic profile of raltegravir in neonates. The antiviral activity will be based on the results of virologic response over at least 24 weeks of dosing and safety will be monitored for a minimum of 24 weeks.

Final Protocol Submission: December 2012
Study/Trial Completion: April 2014
Final Report Submission: January 2015

We reference the deferral granted in the October 12, 2007 approval letter for NDA 22145:

582-3 Deferred pediatric study under PREA for the treatment of HIV-1 infection in pediatric subjects from 4 weeks to 2 years of age. This study will determine raltegravir exposure (pharmacokinetic profile) followed by 24 weeks of dosing. Efficacy will be based on viral load reduction through 24 weeks of dosing and safety will be monitored for a minimum of 24 weeks to support raltegravir dose selection, safety, and efficacy in this population.

Final Protocol Submission: Submitted September 2008
Final Report Submission: June 2011

Reports of these required pediatric postmarketing studies must be submitted as a new drug application (NDA) or as a supplement to your approved NDA with the proposed labeling changes you believe are warranted based on the data derived from these studies. When submitting the reports, please clearly mark your submission "**SUBMISSION OF REQUIRED PEDIATRIC ASSESSMENTS**" in large font, bolded type at the beginning of the cover letter of the submission.

We note you have fulfilled the pediatric study requirement for ages 2 to 11 years for this application, and that studies to fulfill the pediatric study requirement for ages 6 to 18 years were submitted to NDA 22145.

PROMOTIONAL MATERIALS

You may request advisory comments on proposed introductory advertising and promotional labeling. To do so, submit, in triplicate, a cover letter requesting advisory comments, the

proposed materials in draft or mock-up form with annotated references, and the package insert to:

Food and Drug Administration
Center for Drug Evaluation and Research
Office of Prescription Drug Promotion
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 Office of Prescription Drug Promotion (OPDP), see <http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm>.

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, please contact Elizabeth Thompson, M.S., Regulatory Project Manager, at (301) 796-0824 or via email at elizabeth.thompson@fda.hhs.gov.

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:

Content of Labeling
Carton and Container Labeling

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

/s/

JEFFREY S MURRAY
12/21/2011