



NDA 022426

**NDA APPROVAL**

Takeda Pharmaceuticals U.S.A., Inc.  
Attention: Sandra D. Cosner, RPh  
Associate Director, Regulatory Affairs  
One Takeda Parkway  
Deerfield, IL 60015

Dear Ms. Cosner:

Please refer to your New Drug Application (NDA) dated September 19, 2008, received September 22, 2008, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Oseni (alogliptin and pioglitazone) tablets, 12.5 mg/15 mg, 12.5 mg/30 mg, 12.5 mg/45 mg, 25 mg/15 mg, 25 mg/30 mg, and 25 mg/45 mg.

We also refer to our approval letter dated January 25, 2013, which contained the following error: page 88 of 102 incorrectly displays an earlier draft version of the blister wallet package for the 25 mg/30 mg strength, 7-count labeling. This draft version contained the statement "Package Not Child Resistant". A design change was made to this component making it child resistant and the statement was removed from the packaging in the final draft.

This replacement approval letter incorporates the correct version of the blister wallet package label. The effective approval date will remain January 25, 2013, the date of the original approval letter.

We acknowledge receipt of your amendments dated October 6 and 29, and November 13 and 14, 2008, and January 9, 19, and 28, March 30, April 14, May 6, 20, 22, 26, and 29, June 16, 18, and 30, and October 28, 2009, and January 21, February 11, March 15, April 13, May 7, June 21, and July 21, 2010, and April 19, May 25 and 31, July 13, 25, and 27, August 25, September 9 and 14, October 18 (2) and 28, November 7 and 17, and December 2, 7, 13, and 20, 2011, and January 20, 23, and 24, February 1, 9, 13, 14, and 22 (2), March 6, 8, 13, 22, 23, 26, 27, 28, and 30, April 4, 5, 12, 19, 27, and 30, May 30, July 12 and 27, August 1 (2), 2, 6, 8, and 14, September 13 and 25, October 5 and 10, November 1, 9, 15, 16, 27, and 30, and December 18, 2012, and January 7 (2), 9, 11, and 17, 2013. We also acknowledge receipt of your emails dated January 24 and 25, 2013 that included the agreed-upon labeling.

The submission dated July 27, 2012, constituted a complete response to our action letter dated April 25, 2012.

This new drug application provides for the use of Oseni (alogliptin and pioglitazone fixed-dose combination) tablets as an adjunct to diet and exercise to improve glycemic control in adults with type 2 diabetes mellitus.

We have completed our review of this application. 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 and text for the Medication Guide). Information on submitting SPL files using eLIST may be found in the guidance for industry *SPL Standard for Content of Labeling Technical Qs and As*, available at <http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf>.

The SPL will be accessible via publicly available labeling repositories.

### **CARTON AND IMMEDIATE-CONTAINER LABELS**

Submit final printed carton and immediate-container labels that are identical to the enclosed carton and immediate-container labels submitted on **January 17, 2013**, 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 *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 022426.**” 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.

### **EXPIRY DATING PERIOD**

A 24-month expiry dating period is granted for Oseni (alogliptin and pioglitazone) tablets of all strengths when stored at 25°C (77°F) with excursions permitted to 15°-30°C (59°-86°F).

### **ADVISORY COMMITTEE**

Your application for Oseni was not referred to an FDA advisory committee because this drug is not the first in its class and outside expertise was not necessary; there were no controversial issues that would benefit from advisory committee discussion.

### **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 for this application because there is evidence strongly suggesting that the drug product would be unsafe in all pediatric age groups.

### **POSTMARKETING REQUIREMENTS UNDER 505(o)**

Section 505(o)(3) of the FDCA authorizes FDA to require holders of approved drug and biological product applications to conduct postmarketing studies and clinical trials for certain purposes, if FDA makes certain findings required by the statute.

We have determined that an analysis of spontaneous postmarketing adverse events reported under subsection 505(k)(1) of the FDCA will not be sufficient to assess signals of serious risks of hepatotoxicity, acute pancreatitis, and hypersensitivity reactions in patients treated with Oseni (alogliptin and pioglitazone).

Furthermore, the new pharmacovigilance system that FDA is required to establish under section 505(k)(3) of the FDCA will not be sufficient to assess these serious risks.

Therefore, based on appropriate scientific data, FDA has determined that you are required to conduct the following:

- 2008-1:** An assessment and analysis of spontaneous reports of serious hepatic abnormalities, fatal pancreatitis, hemorrhagic/necrotizing pancreatitis, and severe hypersensitivity reactions (angioedema, anaphylaxis, Stevens Johnson Syndrome) in patients treated with Oseni (alogliptin and pioglitazone). Specialized follow-up should be obtained on these cases to collect additional information on the events. This enhanced pharmacovigilance should continue for a period of 5 years from the date of approval for reports of fatal pancreatitis and hemorrhagic/necrotizing pancreatitis, and 10 years from the date of approval for reports of serious hepatic abnormalities and severe hypersensitivity reactions.

The timetable you submitted on January 21, 2013, states that you will conduct this study according to the following schedule:

Final Protocol Submission:	October 31, 2013
Interim Report Submissions:	March 31, 2014
	March 31, 2015
	March 31, 2016
	March 31, 2017
	March 31, 2018
	March 31, 2019
	March 31, 2020
	March 31, 2021
	March 31, 2022
Study Completion:	January 31, 2023
Final Report Submission:	September 30, 2023

Submit the protocol to your IND 073193, with a cross-reference letter to this NDA. Submit all interim and final reports to your NDA. Prominently identify the submission with the following wording in bold capital letters at the top of the first page of the submission, as appropriate: **“Required Postmarketing Protocol Under 505(o)”**, **“Required Postmarketing Final Report Under 505(o)”**, **“Required Postmarketing Correspondence Under 505(o)”**.

Section 505(o)(3)(E)(ii) of the FDCA requires you to report periodically on the status of any study or clinical trial required under this section. This section also requires you to periodically report to FDA on the status of any study or clinical trial otherwise undertaken to investigate a safety issue. Section 506B of the FDCA, as well as 21 CFR 314.81(b)(2)(vii) requires you to report annually on the status of any postmarketing commitments or required studies or clinical trials.

FDA will consider the submission of your annual report under section 506B and 21 CFR 314.81(b)(2)(vii) to satisfy the periodic reporting requirement under section 505(o)(3)(E)(ii) provided that you include the elements listed in 505(o) and 21 CFR 314.81(b)(2)(vii). We remind you that to comply with 505(o), your annual report must also include a report on the status of any study or clinical trial otherwise undertaken to investigate a safety issue. Failure to submit an annual report for studies or clinical trials required under 505(o) on the date required will be considered a violation of FDCA section 505(o)(3)(E)(ii) and could result in enforcement action.

## **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

As required under 21 CFR 314.81(b)(3)(i), you must submit final promotional materials, and the package insert, at the time of initial dissemination or publication, accompanied by a Form FDA 2253. For instruction on completing the Form FDA 2253, see 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>.

## **METHODS VALIDATION**

We have not completed validation of the regulatory methods. However, we expect your continued cooperation to resolve any problems that may be identified.

## **REPORTING REQUIREMENTS**

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

## **MEDWATCH-TO-MANUFACTURER PROGRAM**

The MedWatch-to-Manufacturer Program provides manufacturers with copies of serious adverse event reports that are received directly by the FDA. New molecular entities and important new biologics qualify for inclusion for three years after approval. Your firm is eligible to receive copies of reports for this product. To participate in the program, please see the enrollment instructions and program description details at <http://www.fda.gov/Safety/MedWatch/HowToReport/ucm166910.htm>.

## **POST-ACTION FEEDBACK MEETING**

New molecular entities and new biologics qualify for a post-action feedback meeting. Such meetings are used to discuss the quality of the application and to evaluate the communication process during drug development and marketing application review. The purpose is to learn from successful aspects of the review process and to identify areas that could benefit from improvement. If you would like to have such a meeting with us, call the Regulatory Project Manager for this application.

If you have any questions, call Richard Whitehead, Regulatory Project Manager, at (301) 796-4945.

Sincerely,

*{See appended electronic signature page}*

Curtis Rosebraugh, M.D., M.P.H.  
Director  
Office of Drug Evaluation II  
Center for Drug Evaluation and Research

Enclosures:

Prescribing Information  
Medication Guide  
Carton and Container Labels

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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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CURTIS J ROSEBRAUGH  
01/25/2013