



NDA 022341/S-024

**SUPPLEMENT APPROVAL**

Novo Nordisk, Inc.  
Attention: Michelle Thompson  
Senior Director, Regulatory Affairs  
P.O. Box 846, 800 Scudders Mill Road  
Plainsboro, NJ 08536

Dear Ms. Thompson:

Please refer to your Supplemental New Drug Application (sNDA) dated and received May 5, 2015, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Victoza (liraglutide [rDNA origin] injection).

We acknowledge receipt of your amendments dated June 24, and June 29, 2015.

This supplemental new drug application provides for proposed modifications to the approved Victoza risk evaluation and mitigation strategy (REMS) to conform to the safety labeling changes approved in sNDA No. 023 on March 9, 2015. This supplement is in response to our REMS Modification Notification letter dated April 29, 2015.

We have completed our review of this supplemental application, as amended. It is approved, effective on the date of this letter.

**RISK EVALUATION AND MITIGATION STRATEGY REQUIREMENTS**

The REMS for Victoza was originally approved on January 25, 2010, and was last modified on July 31, 2014. The REMS consists of a communication plan and a timetable for submission of assessments of the REMS. In order to ensure that the benefits of Victoza outweigh its risks, we determined that you were required to submit a REMS modification to conform the REMS to the safety labeling changes approved on March 9, 2015. The required modifications included a revised REMS document and changes to the following REMS appended materials: REMS Letters, REMS Factsheet, REMS Slides, and REMS webpage.

Your proposed modified REMS, submitted on June 29, 2015, and appended to this letter, is approved. We acknowledge receipt of your updated REMS supporting document that includes a description of all proposed modifications and their potential impact on other REMS elements.

The timetable for submission of assessments of the REMS may remain the same as that approved on January 25, 2010. There are no changes to the REMS assessment plan described in our July 31, 2014, letter.

We remind you that in addition to the REMS assessments submitted according to the timetable in the approved REMS, you must include an adequate rationale to support a proposed REMS modification for the addition, modification, or removal of any of goal or element of the REMS, as described in section 505-1(g)(4) of the FDCA.

We also remind you that you must submit a REMS assessment when you submit a supplemental application for a new indication for use as described in section 505-1(g)(2)(A). This assessment should include:

- a) An evaluation of how the benefit-risk profile will or will not change with the new indication;
- b) A determination of the implications of a change in the benefit-risk profile for the current REMS;
- c) *If the new indication for use introduces unexpected risks:* A description of those risks and an evaluation of whether those risks can be appropriately managed with the currently approved REMS.
- d) *If a REMS assessment was submitted in the 18 months prior to submission of the supplemental application for a new indication for use:* A statement about whether the REMS was meeting its goals at the time of that the last assessment and if any modifications of the REMS have been proposed since that assessment.
- e) *If a REMS assessment has not been submitted in the 18 months prior to submission of the supplemental application for a new indication for use:* Provision of as many of the currently listed assessment plan items as is feasible.
- f) *If you propose a REMS modification based on a change in the benefit-risk profile or because of the new indication of use, submit an adequate rationale to support the modification, including:* Provision of the reason(s) why the proposed REMS modification is necessary, the potential effect on the serious risk(s) for which the REMS was required, on patient access to the drug, and/or on the burden on the health care delivery system; and other appropriate evidence or data to support the proposed change. Additionally, include any changes to the assessment plan necessary to assess the proposed modified REMS. *If you are not proposing REMS modifications, provide a rationale for why the REMS does not need to be modified.*

If the assessment instruments and methodology for your REMS assessments are not included in the REMS supporting document, or if you propose changes to the submitted assessment instruments or methodology, you should update the REMS supporting document to include specific assessment instrument and methodology information at least 90 days before the assessments will be conducted. Updates to the REMS supporting document may be included in a new document that references previous REMS supporting document submission(s) for unchanged portions. Alternatively, updates may be made by modifying the complete previous REMS supporting document, with all changes marked and highlighted. Prominently identify the

submission containing the assessment instruments and methodology with the following wording in bold capital letters at the top of the first page of the submission:

**NDA 022341 REMS CORRESPONDENCE  
(insert concise description of content in bold capital letters, e.g.,  
UPDATE TO REMS SUPPORTING DOCUMENT - ASSESSMENT  
METHODOLOGY**

An authorized generic drug under this NDA must have an approved REMS prior to marketing. Should you decide to market, sell, or distribute an authorized generic drug under this NDA, contact us to discuss what will be required in the authorized generic drug REMS submission.

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

**NDA 022341 REMS ASSESSMENT**

**NEW SUPPLEMENT FOR NDA 022341/S-000  
CHANGES BEING EFFECTED IN 30 DAYS  
PROPOSED MINOR REMS MODIFICATION**

*or*

**NEW SUPPLEMENT FOR NDA 022341/S-000  
PRIOR APPROVAL SUPPLEMENT  
PROPOSED MAJOR REMS MODIFICATION**

*or*

**NEW SUPPLEMENT FOR NDA 022341/S-000  
PRIOR APPROVAL SUPPLEMENT  
PROPOSED REMS MODIFICATIONS DUE TO SAFETY LABEL CHANGES  
SUBMITTED IN SUPPLEMENT S-XXX**

*or*

**NEW SUPPLEMENT (NEW INDICATION FOR USE)  
FOR NDA 022341/S-000  
>  
PROPOSED REMS MODIFICATION (if included)**

Should you choose to submit a REMS revision, prominently identify the submission containing the REMS revisions with the following wording in bold capital letters at the top of the first page of the submission:

## **REMS REVISIONS FOR NDA 022341**

To facilitate review of your submission, we request that you submit your proposed modified REMS and other REMS-related materials in Microsoft Word format. If certain documents, such as enrollment forms, are only in PDF format, they may be submitted as such, but the preference is to include as many as possible in Word format.

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

### **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 Marisa Petruccelli, Regulatory Project Manager, at (240) 402-6147.

Sincerely,

*{See appended electronic signature page}*

Jennifer Rodriguez Pippins, M.D., M.P.H.  
Deputy Director for Safety  
Division of Metabolism and Endocrinology Products  
Office of Drug Evaluation II  
Center for Drug Evaluation and Research

ENCLOSURE:  
REMS

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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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JENNIFER R PIPPINS  
07/01/2015