Dear Mr. Grijalva:

Please refer to your Supplemental New Drug Application (sNDA) dated and received May 11, 2016, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Absorica® (isotretinoin) Capsules, 10, 20, 25, 30, 35, and 40 mg.

This Prior Approval supplemental new drug application provides for proposed modifications to the approved risk evaluation and mitigation strategy (REMS) for the isotretinoin iPLEDGE REMS.

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.

Because none of these criteria apply to your application, you are exempt from this requirement.

RISK EVALUATION AND MITIGATION STRATEGY REQUIREMENTS

The iPLEDGE REMS for isotretinoin products, of which Absorica® (isotretinoin) Capsules is a member, was originally approved on October 22, 2010, and the most recent REMS modification was approved on February 4, 2016. The REMS consists of a Medication Guide, elements to assure safe use, an implementation system, and a timetable for submission of assessments of the REMS.

Your proposed modifications to the REMS, specifically the REMS website and Interactive Voice Recognition System (IVRS) Prompts, consist of:
1. Minor typographical and formatting changes. Addition of the iPLEDGE Terms of Use text, which includes the Privacy Statement.

2. Addition of the following statement in the Interactive Voice Recognition System (IVRS) public prompts for all stakeholders: “I understand and will comply with the iPLEDGE Terms of Use and Non-Compliance Action Policy. The iPLEDGE Terms of Use and the Non-Compliance Action Policy are available at www.ipledgeprogram.com.”

3. Addition of a button to the www.ipledgeprogram.com website home page, “For Office Staff Designees.”

4. Addition of “Find a Patient” functionality for pharmacies. This link will be accessible via the pharmacy menu, post-login.

5. Date of Personal Significance (DOPS) Entry Changes to prepopulate the DOPS field with forward slashes “/” and prompt users with MM/DD/YYYY.

Your proposed modified REMS appended to this letter, is approved.

The iPLEDGE REMS for isotretinoin products currently includes the products listed on the FDA REMS website, available at http://www.fda.gov/REMS. Other products may be added to this REMS in the future if additional isotretinoin NDAs or ANDAs are approved.

The timetable for submission of assessments of the REMS remains the same as that approved on May 25, 2012.

There are no changes to the REMS assessment plan described in our May 25, 2012 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 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, proposed 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 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 rational 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 a REMS modification, 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 021951 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.

We remind you that section 505-1(f)(8) of FDCA prohibits holders of an approved covered application with elements to assure safe use from using any element to block or delay approval of an application under section 505(b)(2) or (j). A violation of this provision in 505-1(f) could result in enforcement action.

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 021951 REMS ASSESSMENT
NEW SUPPLEMENT FOR NDA 021951/S-000
CHANGES BEING EFFECTED IN 30 DAYS
PROPOSED MINOR REMS MODIFICATION

or

NEW SUPPLEMENT FOR NDA 021951
PRIOR APPROVAL SUPPLEMENT
PROPOSED MAJOR REMS MODIFICATION

or

NEW SUPPLEMENT FOR NDA 021951/S-000
PRIOR APPROVAL SUPPLEMENT
PROPOSED REMS MODIFICATIONS DUE TO SAFETY LABEL CHANGES
SUBMITTED IN SUPPLEMENT XXX

NEW SUPPLEMENT (NEW INDICATION FOR USE)
FOR NDA 021951/S-000
REMS ASSESSMENT
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 REVISION FOR NDA 021951

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).

We also remind you of your specific reporting obligations regarding serious adverse events in
patients who have received Absorica® (isotretinoin) Capsules. In addition to the usual
postmarketing reporting of adverse drug experiences (21 CFR 314.80(C)), you will submit a 15-
day report for each of the following:

- All pregnancy exposures to Absorica® (isotretinoin) Capsules; and
- All psychiatric events including suicides, attempted suicides, and suicidal ideation

If you have any questions, call Matthew White, Regulatory Project Manager, at (301) 796-4997.

Sincerely,

{See appended electronic signature page}

Tatiana Oussova, MD, MPH  
Deputy Director for Safety  
Division of Dermatology and Dental Products  
Office of Drug Evaluation III  
Center for Drug Evaluation and Research

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

/s/

TATIANA OUSSOVA
07/08/2016