



NDA 208470

NDA APPROVAL

EndoCeutics Inc.
Attention: Fernand Labrie, M.D., Ph.D.
c/o U.S. Agent, Accenture, LLP
Raj Bandaru, Ph.D.
Global Regulatory Affairs
1160 W. Swedesford Road, Building One
Berwyn, PA 19312

Dear Dr. Labrie:

Please refer to your New Drug Application (NDA) dated October 16, 2016, received October 16, 2015, and your amendments, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act (FDCA) for INTRAROSA™ (prasterone) vaginal inserts.

We acknowledge receipt of your major amendment dated July 12, 2016, which extended the goal date by three months.

This new drug application provides for the use of INTRAROSA™ (prasterone) vaginal inserts for the treatment of moderate to severe dyspareunia, a symptom of vulvar and vaginal atrophy, due to menopause.

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.

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, and text for the instructions for use). 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, 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 208470.**” Approval of this submission by FDA is not required before the labeling is used.

Marketing the product with Final Printed Labeling 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 for this application because necessary studies are impossible or highly impracticable. Menopause does not occur in the pediatric population.

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, Medication Guide, and patient PI (as applicable) to:

OPDP Regulatory Project Manager
Food and Drug Administration
Center for Drug Evaluation and Research
Office of Prescription Drug Promotion
5901-B Ammendale Road
Beltsville, MD 20705-1266

Alternatively, you may submit a request for advisory comments electronically in eCTD format. For more information about submitting promotional materials in eCTD format, see the draft Guidance for Industry (available at:

<http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM443702.pdf>).

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. Form FDA 2253 is available at

<http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083570.pdf>.

Information and Instructions for completing the form can be found at

<http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf>. 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).

In addition to the above reporting requirements, we request that you submit additional quarterly safety reports based on all postmarketing reports of adverse events related to use of the vaginal insert applicator and abnormal Pap smear findings for INTRAROSA. Include the following adverse events of special interest: difficulty with insertion and removal of the applicator; vulvar, vaginal or cervical abrasions and/or lacerations; urinary tract infections; findings of atypical squamous cell of undetermined significance (ASC-US), low grade squamous intraepithelial lesion (LGSIL), high grade squamous intraepithelial lesion (HGSIL), squamous cell carcinoma, atypical glandular cells not otherwise specified (AGC-NOS), atypical glandular cells, suspicious for adenocarcinoma *in situ* or cancer (AGC-neoplastic), adenocarcinoma *in situ* and adenocarcinoma. We request that you submit these reports for a period of three years following launch of INTRAROSA in the US.

If you have any questions, call Kim Shiley, R.N., B.S.N., Regulatory Project Manager, at (301) 796-2117.

Sincerely,

{See appended electronic signature page}

Audrey Gassman, M.D.
Deputy Director
Division of Bone, Reproductive, and Urologic Products
Office of Drug Evaluation III
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/

AUDREY L GASSMAN
11/16/2016