



NDA 020453/S-007

**SUPPLEMENT APPROVAL  
FULFILLMENT OF POSTMARKETING COMMITMENT**

Fougera Pharmaceuticals Inc.  
Attention: Amy Byrom  
Director, Regulatory Affairs  
60 Baylis Road, PO Box 2006  
Melville, NY 11747

Dear Ms. Byrom:

Please refer to your Supplemental New Drug Application (sNDA) dated and received May 3, 2016, and your amendments, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Pandel (hydrocortisone probutate) Cream, 0.1%.

This Prior Approval supplemental new drug application provided the final study report for the HPA axis suppression study performed using Pandel in adults and revision of the Pandel (hydrocortisone probutate) Cream, 0.1% full prescribing information to comply with the labeling content and format requirements for human prescription drug and biological products, according to 21 CFR 201.56(d) and 201.57.

**APPROVAL & LABELING**

We have completed our review of this supplemental 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), 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 that include labeling changes 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).

### **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.

### **FULFILLMENT OF POSTMARKETING COMMITMENT**

We have received your submission dated May 13, 2016, containing the final report for the following postmarketing commitment listed in our February 28, 1997 approval letter.

- 295-1      A commitment to perform a Phase 4 adrenal suppression study in pediatric patients with large areas of involved skin using ACTH stimulation. This will be followed by an adrenal suppression study in adult patients with large areas of involved skin using ACTH stimulation only if the pediatric study data show a significant adrenal suppression effect.

We note that during a subsequent teleconference on February 19, 2003, the FDA communicated to you that the above commitment should be modified to begin enrollment with an adult cohort (18 years or greater) first. We further communicated that before enrollment of pediatric subjects, all subjects in the adult cohort should first complete the study and show no finding of HPA axis suppression.

We have reviewed your submission and conclude that the above commitment was fulfilled.

### **PROMOTIONAL MATERIALS**

You may request advisory comments on proposed introductory advertising and promotional labeling. To do so, submit the following, in triplicate, (1) a cover letter requesting advisory comments, (2) the proposed materials in draft or mock-up form with annotated references, and (3) the package insert(s) to:

OPDP Regulatory Project Manager  
Food and Drug Administration  
Center for Drug Evaluation and Research  
Office of Prescription Drug Promotion (OPDP)  
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> ).

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/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).

If you have any questions, call Paul Phillips, Regulatory Project Manager, at (301) 796-3935.

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:  
Content of Labeling

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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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TATIANA OUSSOVA  
01/25/2017