



NDA 202811/S-010

**SUPPLEMENT APPROVAL**

Forest Laboratories, LLC  
Attention: Linda Kunka  
Director, Regulatory Affairs  
Harborside Financial Center  
Plaza V, Suite 1900  
Jersey City, NJ 07311

Dear Ms. Kunka:

Please refer to your Supplemental New Drug Application (sNDA) dated and received March 25, 2016, and your amendments, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Linzess (linaclotide) capsules, 72 mcg.

This Prior Approval supplemental new drug application proposes a new dosage regimen (72 mcg) for the treatment of adults with chronic idiopathic constipation (CIC).

**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.

We note that your January 24, 2017, submission includes final printed labeling (FPL) for your package insert and Medication Guide. We have not reviewed this FPL. You are responsible for assuring that the wording in this printed labeling is identical to that of the approved content of labeling in the structured product labeling (SPL) format.

**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 and Medication Guide), 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).

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

We acknowledge your October 21, 2016, submission containing final printed carton and container labels.

### **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.

Your deferred pediatric studies required by section 505B(a) of the Federal Food, Drug, and Cosmetic Act/FDCA are required postmarketing studies. The status of these postmarketing studies must be reported annually according to 21 CFR 314.81 and section 505B(a)(3)(C) of the Federal Food, Drug, and Cosmetic Act/FDCA. These required studies are listed below.

No new pediatric assessments are required because those already required for this NDA are sufficient. The following is a list of deferred required pediatric assessments which are applicable to this supplemental NDA approval for a new dosing regimen in adults with chronic idiopathic constipation:

2161-2 Conduct a safety and efficacy study in pediatric patients with chronic idiopathic constipation ages 2 to 5 years treated with Linzess (linaclotide).

Final Protocol Submission 01/18  
Study Completion 12/22  
Final Report Submission 12/23

2161-3 Conduct a safety and efficacy study in pediatric patients with chronic Idiopathic constipation ages 6 to 17 years treated with Linzess (linaclotide).

Final Protocol Submission 04/15  
Study Completion 12/22  
Final Report Submission 12/23

Submit the protocols to your IND 063290, with a cross-reference letter to this NDA.

Reports of this/these required pediatric postmarketing study(ies) must be submitted as a new drug application (NDA) or as a supplement to your approved NDA with the proposed labeling changes you believe are warranted based on the data derived from these studies. When submitting the reports, please clearly mark your submission "SUBMISSION OF REQUIRED PEDIATRIC ASSESSMENTS" in large font, bolded type at the beginning of the cover letter of the submission.

### **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 CDR Cheronda Cherry-France, Regulatory Project Manager, at (301) 796-7295.

Sincerely,

*{See appended electronic signature page}*

Joyce Korvick, M.P.H., M.D.  
Deputy Director, Safety  
Division of Gastroenterology and Inborn Errors  
Products  
Office of Drug Evaluation III  
Center for Drug Evaluation and Research

### ENCLOSURE(S):

Content of Labeling  
Carton and Container 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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JOYCE A KORVICK  
01/25/2017