



NDA 208751

**NDA APPROVAL**

Novo Nordisk Inc.  
Attention: Robert B. Clark  
Vice President, Regulatory Affairs  
800 Scudders Mill Rd.  
Plainsboro, NJ 08536

Dear Mr. Clark:

Please refer to your New Drug Application (NDA) dated and received December 8, 2015, and your amendments, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Fiasp (insulin aspart injection) 100 units/mL.

We acknowledge receipt of your amendment dated March 29, 2017, which constituted a complete response to our October 7, 2016, action letter.

This new drug application provides for the use of Fiasp (insulin aspart injection) to improve glycemic control in adults with diabetes mellitus.

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 prescribing information, text for the patient package insert, and 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 titled *Providing Regulatory Submissions in Electronic Format — Certain Human Pharmaceutical Product Applications and Related Submissions Using the eCTD Specifications (May 2015, Revision 3)*. For administrative purposes, designate this submission “**Final Printed Carton and Container Labels for approved NDA 208751.**” Approval of this submission by FDA is not required before the labeling is used.

## **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 studies requirement for type 1 diabetes mellitus in ages 0 to < 1 year and type 2 diabetes mellitus in ages 0 to < 10 years because necessary studies are impossible or highly impracticable. This is because there are too few children in this age range with diabetes mellitus to study.

We are deferring submission of your pediatric study for ages 1 to 17 years (inclusive) for this application because this product is ready for approval for use in adults and the pediatric study has not been completed.

Your deferred pediatric study required by section 505B(a) of the FDCA is a required postmarketing study. The status of this postmarketing study must be reported annually according to 21 CFR 314.81 and section 505B(a)(3)(C) of the FDCA. This required study is listed below.

3253-1 Conduct a 26-week, randomized, controlled efficacy and safety study comparing Fiasp (insulin aspart) administered at mealtime and Fiasp (insulin aspart) administered postmeal to NovoLog administered at mealtime, in combination with insulin degludec, in pediatric patients with type 1 diabetes ages 1 to 17 years (inclusive).

Study Completion: 03/2018  
Final Report Submission: 02/2019

Submit the protocol to your IND 106878, with a cross-reference letter to this NDA.

Reports of this required pediatric postmarketing study 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, 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).

If you have any questions, call Callie Cappel-Lynch, Regulatory Project Manager, at (301) 796-8436.

Sincerely,

*{See appended electronic signature page}*

Jean-Marc Guettier, M.D.  
Director  
Division of Metabolism and Endocrinology  
Products  
Office of Drug Evaluation II  
Center for Drug Evaluation and Research

Enclosures:

Prescribing Information  
Patient Package Insert  
Vial Instructions for Use  
FlexTouch Instructions for Use  
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/  
-----

JEAN-MARC P GUETTIER  
09/29/2017