



NDA 8372/S-057

**SUPPLEMENT APPROVAL**

Mallinckrodt ARD Inc.  
Attention: Roxanne Tavakkol, MS  
Vice President, Global Regulatory Affairs  
1425 U.S. Route 206, 2<sup>nd</sup> floor  
Bedminster, NJ 07921

Dear Ms. Tavakkol:

Please refer to your Supplemental New Drug Application (sNDA) dated and received October 26, 2017, and your amendment, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for H.P. Acthar Gel (respository corticotropin injection).

This “Changes Being Effected” supplemental new drug application adds the following term to the Adverse Reactions section of the Prescribing Information:

**Section 6.2: Postmarketing Experience**

6.2.6 Injection site reactions.

**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.

**WAIVER OF HIGHLIGHTS SECTION**

We are waiving the requirements of 21 CFR 201.57(d)(8) regarding the length of Highlights of prescribing information. This waiver applies to all future supplements containing revised labeling unless we notify you otherwise.

**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), 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).

## **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, contact Stephanie N. Parncutt, M.H.A., Regulatory Health Project Manager, at (301) 796-4098.

Sincerely,

*{See appended electronic signature page}*

Alice Hughes, M.D.  
Deputy Director for Safety  
Division of Neurology Products  
Office of Drug Evaluation I  
Center for Drug Evaluation and Research

ENCLOSURE(S):  
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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ALICE HUGHES  
04/26/2018