DEPARTMENT OF HEALTH AND HUMAN SERVICES

Food and Drug Administration
Silver Spring, MD 20993

NDA 020612/S-014

SUPPLEMENT APPROVAL
PRIOR APPROVAL SUPPLEMENT REQUEST –
PLR CONVERSION

Teikoku Pharma USA, Inc.
1718 Ringwood Ave
San Jose, CA 95131-1711

Attention: Tami Ujiie
Senior Manager, International Regulatory Affairs

Dear Ms. Ujiie:

Please refer to your Supplemental New Drug Application (sNDA) dated and received July 11, 2018, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for LIDODERM (lidocaine patch).

We also refer to our letter May 21, 2018, notifying you, under Section 505(o)(4) of the FDCA, of new safety information that we believe should be included in the labeling for the class of "caine" local anesthetics. This information pertains to the risk of methemoglobinemia.

This supplemental new drug application provides for revisions to the labeling for LIDODERM consistent with our May 21, 2018, Safety Labeling Change Notification letter.

APPROVAL & LABELING

We have completed our review of this supplemental application. 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, 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 Microsoft Word format, that includes the changes approved in this supplemental application, as well as annual reportable changes. To facilitate review of your submission(s), 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).

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 Prescribing Information 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 Prescribing Information, 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.

All promotional materials that include representations about your drug product must be promptly revised to be consistent with the labeling changes approved in this supplement, including any new safety information [21 CFR 314.70(a)(4)]. The revisions in your promotional materials should include prominent disclosure of the important new safety information that appears in the revised labeling. Within 7 days of receipt of this letter, submit your statement of intent to comply with 21 CFR 314.70(a)(4) to the address above, by fax to 301-847-8444, or 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).

PHYSICIANS LABELING RULE (PLR) CONVERSION REQUEST

We note that your prescribing information (PI) is not required to be in Physician Labeling Rule (PLR) format, however, we recommend that you submit a prior approval supplement (PAS) with your proposed PLR-format labeling for FDA review within 120 days of receipt of this letter.

If you submit your draft labeling in PLR format, we recommend you:

- Review the labeling review resources on the *PLR Requirements of Prescribing Information* website including:
  - Physician Labeling Rule on the content and format of the PI,
  - Regulations and related guidance documents,
  - A sample tool illustrating the format for Highlights and Contents,
  - Selected Requirements for Prescribing Information (SRPI) − a checklist of important format items from labeling regulations and guidances, and
  - FDA's established pharmacologic class (EPC) text phrases for inclusion in the Highlights Indications and Usage heading.
- Clearly mark on the cover letter "**Labeling/PLR Conversion**"
- Submit a clean version as well as a marked-up version of the PI (that identifies all your proposed changes to the last approved PI) in Microsoft Word format, and a clean version of the last approved PI in non-PLR format.
- Your supplement must include updated content of labeling 21 CFR 314.50(l)(1)(i) in structured product labeling (SPL) format as described at https://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.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 Parinda Jani, Chief, Project Management Staff, at (301) 796-1232.

Sincerely,

{See appended electronic signature page}

Judith A. Racoosin, MD, MPH
Deputy Director for Safety
Division of Anesthesia, Analgesia,
and Addiction Products
Office of Drug Evaluation II
Center for Drug Evaluation and Research

ENCLOSURE:
Content of Labeling

This is a representation of an electronic record that was signed electronically. Following this are manifestations of any and all electronic signatures for this electronic record.

/s/

JUDITH A RACOOSIN
11/02/2018