



NDA 208910

NDA APPROVAL

RxM™ Therapeutics, LLC (a Wholly-Owned Subsidiary of CutisPharma, Inc.)
c/o B&H Consulting Services, Inc.
Attention: Elizabeth N. Dupras, RAC
Director, CM&C and Global Regulatory Affairs
50 Division Street, Suite 206
Somerville, NJ 08876

Dear Ms. Dupras:

Please refer to your New Drug Application (NDA) dated July 28, 2017, received July 28, 2017, and your amendment, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act for Firvanq (vancomycin hydrochloride) for oral solution, 25 mg/mL and 50 mg/mL.

This new drug application provides for the use of Firvanq (vancomycin hydrochloride) for oral solution), 25 mg/mL and 50 mg/mL, for the treatment of *Clostridium difficile*-associated diarrhea and Enterocolitis caused by *Staphylococcus aureus* (including methicillin-resistant strains).

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.

We note that your January 24, 2018, submission includes final printed labeling (FPL) for your prescribing information. 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 prescribing information). 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

We acknowledge the proposal in your December 22, 2017, submission, to use the same barcode and National Drug Code (NDC) on the kit to appear on the active ingredient powder container label. Since the bottle of active ingredient powder is not required to be listed with FDA and assigned an NDC (because the powder is (b) (4) not otherwise distributed or sold separately for use in other products), FDA will permit you to not list and assign a unique NDC to the bottle of active ingredient powder (see 21 CFR 207.33). We allow you to assign the same barcode and NDC to the kit and the active ingredient powder container label.

Submit final printed carton and immediate container labels that are identical to the enclosed carton and immediate container labels, except with the revisions listed above, 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 208910.**” Approval of this submission by FDA is not required before the labeling is used.

ADVISORY COMMITTEE

Your application for Firvanq was not referred to an FDA advisory committee because outside expertise was not necessary; there were no issues that would benefit from advisory committee discussion.

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.

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 prescribing information, 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 prescribing information, 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 Jane A. Dean, RN, MSN, Regulatory Health Project Manager, at (301) 796-1202.

Sincerely,

{See appended electronic signature page}

Sumathi Nambiar, MD, MPH
Director
Division of Anti-Infective Products
Office of Antimicrobial Products
Center for Drug Evaluation and Research

Enclosure(s):
Content of Labeling
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/

SUMATHI NAMBIAR
01/26/2018