



BLA 761032/S-004

**SUPPLEMENT APPROVAL**

Valeant Pharmaceuticals Luxembourg S.a.r.l. (VPL)  
Attention: Isabelle Lefebvre  
Vice President Regulatory Affairs  
400 Somerset Corporate Boulevard  
Bridgewater, NJ 08807

Dear Ms. Lefebvre:

Please refer to your Supplemental Biologics License Application (sBLA), dated and received November 28, 2017, and your amendments, submitted under section 351(a) of the Public Health Service Act for Siliq (brodalumab).

We acknowledge receipt of your risk evaluation and mitigation strategy (REMS) assessment August 15, 2017.

This “Changes Being Effected” supplemental biologics application provides for modifications to the approved risk evaluation mitigation strategy (REMS).

We have completed our review of this supplemental application, as amended. It is approved effective on the date of this letter.

**RISK EVALUATION AND MITIGATION STRATEGY (REMS) REQUIREMENTS**

The REMS for Siliq (brodalumab) was originally approved on February 15, 2017, and the most recent REMS modification was approved on June 8, 2017. The REMS consists of elements to assure safe use, an implementation system, and a timetable of submission of assessments of the REMS. Your proposed modifications to the REMS consist of changes to the REMS document, Prescriber Enrollment Form, REMS website, and REMS supporting document, to reflect the following changes:

- Enable pharmacy staff members to associate with a certified pharmacy
- Allow for patient access to the list of certified prescribers via the REMS website
- Clarify product quantity unit of measurement
- Provide a link on the REMS website to Spanish-language versions of the Patient Prescriber Agreement (PPA) Form and Patient Wallet Card

Your proposed modified REMS, submitted on November 28, 2017, amended on January 19, 2018, and appended to this letter, is approved. The modified REMS consists of elements to assure safe use, an implementation system, and a timetable for submission of assessments of the REMS.

The timetable for submission of assessments of the REMS remains the same as that approved on February 15, 2017.

There are no changes to the REMS assessment plan described in our February 15, 2017 letter.

We remind you that in addition to the REMS assessments submitted according to the timetable in the approved REMS, you must include an adequate rationale to support a proposed REMS modification for the addition, modification, or removal of any goal or element of the REMS, as described in section 505-1(g)(4) of the FDCA.

We also remind you that you must submit a REMS assessment when you submit a supplemental application for a new indication for use, as described in section 505-1(g)(2)(A) of the FDCA. This assessment should include:

- a) An evaluation of how the benefit-risk profile will or will not change with the new indication;
- b) A determination of the implications of a change in the benefit-risk profile for the current REMS;
- c) *If the new indication for use introduces unexpected risks:* A description of those risks and an evaluation of whether those risks can be appropriately managed with the currently approved REMS.
- d) *If a REMS assessment was submitted in the 18 months prior to submission of the supplemental application for a new indication for use:* A statement about whether the REMS was meeting its goals at the time of that last assessment and if any modifications of the REMS have been proposed since that assessment.
- e) *If a REMS assessment has not been submitted in the 18 months prior to submission of the supplemental application for a new indication for use:* Provision of as many of the currently listed assessment plan items as is feasible.
- f) *If you propose a REMS modification based on a change in the benefit-risk profile or because of the new indication of use, submit an adequate rationale to support the modification, including:* Provision of the reason(s) why the proposed REMS modification is necessary, the potential effect on the serious risk(s) for which the REMS was required, on patient access to the drug, and/or on the burden on the health care delivery system; and other appropriate evidence or data to support the proposed change. Additionally, include any changes to the assessment plan necessary to assess the proposed modified REMS. *If you are not proposing REMS modifications, provide a rationale for why the REMS does not need to be modified.*

If the assessment instruments and methodology for your REMS assessments are not included in the REMS supporting document, or if you propose changes to the submitted assessment instruments or methodology, you should update the REMS supporting document to include specific assessment instrument and methodology information at least 90 days before the assessments will be conducted. Updates to the REMS supporting document may be included in a

new document that references previous REMS supporting document submission(s) for unchanged portions. Alternatively, updates may be made by modifying the complete previous REMS supporting document, with all changes marked and highlighted. Prominently identify the submission containing the assessment instruments and methodology with the following wording in bold capital letters at the top of the first page of the submission:

**BLA 761032 REMS ASSESSMENT METHODOLOGY**

Prominently identify any submission containing the REMS assessments or proposed modifications of the REMS with the following wording in bold capital letters at the top of the first page of the submission as appropriate:

**BLA 761032 REMS ASSESSMENT**

*or*

**NEW SUPPLEMENT FOR BLA 761032/ S-000  
CHANGES BEING EFFECTED IN 30 DAYS  
PROPOSED MINOR REMS MODIFICATION**

*or*

**NEW SUPPLEMENT FOR BLA 761032/ S-000  
PRIOR APPROVAL SUPPLEMENT  
PROPOSED MAJOR REMS MODIFICATION**

*or*

**NEW SUPPLEMENT FOR BLA 761032/ S-000  
PRIOR APPROVAL SUPPLEMENT  
PROPOSED REMS MODIFICATIONS DUE TO SAFETY LABEL CHANGES  
SUBMITTED IN SUPPLEMENT XXX**

*or*

**NEW SUPPLEMENT (NEW INDICATION FOR USE)  
FOR BLA 761032/ S-000  
REMS ASSESSMENT  
PROPOSED REMS MODIFICATION (if included)**

Should you choose to submit a REMS revision, prominently identify the submission containing the REMS revisions with the following wording in bold capital letters at the top of the first page of the submission:

**REMS REVISIONS FOR BLA 761032**

To facilitate review of your submission, we request that you submit your proposed modified REMS and other REMS-related materials in Microsoft Word format. If certain documents, such

as enrollment forms, or website screenshots are only in PDF format, they may be submitted as such, but Word format is preferred.

### **SUBMISSION OF REMS DOCUMENT IN SPL FORMAT**

FDA can accept the REMS document in Structured Product Labeling (SPL) format. If you intend to submit the REMS document in SPL format, as soon as possible, but no later than 14 days from the date of this letter, submit the REMS document in SPL format using the FDA automated drug registration and listing system (eLIST).

For more information on submitting REMS in SPL format, please email [REMS\\_Website@fda.hhs.gov](mailto:REMS_Website@fda.hhs.gov).

### **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.

### **REPORTING REQUIREMENTS**

We remind you that you must comply with reporting requirements for an approved BLA (in 21 CFR 600.80 and in 21 CFR 600.81).

If you have any questions, call Dawn Williams, Regulatory Project Manager, at (301) 796-5376.

Sincerely,

*{See appended electronic signature page}*

Tatiana Oussova, MD, MPH  
Deputy Director for Safety  
Division of Dermatology and Dental Products  
Office of Drug Evaluation III  
Center for Drug Evaluation and Research

ENCLOSURE:  
REMS

-----  
**This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.**  
-----

/s/  
-----

DAVID L KETTL  
01/26/2018  
Signing for Dr. Tatiana Oussova