



NDA 204399/S-010

**SUPPLEMENT APPROVAL**

Upsher-Smith Laboratories, LLC  
Attention: Walter J. Szymanski  
Principal Regulatory Specialist, CMC  
6701 Evenstad Drive  
Maple Grove, MN 55369-6026

Dear Mr. Szymanski:

Please refer to your Supplemental New Drug Application (sNDA) dated and received March 22, 2019, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Vogelxo™ (testosterone) gel.

We also refer to our letter dated February 25, 2019, notifying you, under Section 505(o)(4) of the FDCA, of new safety information that we believe should be included in the labeling for topical testosterone gel products. This information pertains to the risk of secondary exposure in women and children.

This supplemental new drug application provides for revisions to the labeling for all topical testosterone gel products, consistent with our February 25, 2019, safety labeling change (SLC) notification letter. These revisions pertain only to the Medication Guide and include the creation of an Instructions for Use section (Note: the Prescribing Information is appended as part of the content for labeling but has not been modified).

**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 (text for the Prescribing Information, Instructions for Use, and Medication Guide), 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).

## **REQUIRED PEDIATRIC ASSESSMENTS**

Under the Pediatric Research Equity Act (PREA) (21 U.S.C. 355c), all applications for new active ingredients (which includes new salts and new fixed combinations), 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 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 NDA (21 CFR 314.80 and 314.81).

If you have any questions, call Meredith Hillig, MS, Safety Regulatory Project Manager, at (301) 796-1218.

Sincerely,

*{See appended electronic signature page}*

Christine P. Nguyen, M.D.  
Deputy Director for Safety  
Division of Bone, Reproductive and Urologic Products  
Office of Drug Evaluation III  
Center for Drug Evaluation and Research

ENCLOSURES:

Content of Labeling  
Prescribing Information  
Medication Guide  
Instructions for Use

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**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.**  
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/s/  
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CHRISTINE P NGUYEN  
05/10/2019 01:00:20 PM