Dear Dr. Hensley:

Please refer to your New Drug Application (NDA) dated and received, June 28, 2018, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Baqsimi (glucagon) nasal powder.

We acknowledge receipt of your major amendment dated April 2, 2019, which extended the goal date by three months.

This new drug application provides for the use of Baqsimi (glucagon) nasal powder for the treatment of severe hypoglycemia in patients with diabetes ages 4 years and above.

APPROVAL & LABELING

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 with minor editorial revisions listed below and reflected in the enclosed labeling.

- Removed an extra space before “redness in your eyes” in the Patient Package Insert.

WAIVER OF ½ PAGE LENGTH REQUIREMENT FOR HIGHLIGHTS

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 Prescribing Information, Patient Package Insert, and Instructions for Use) 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 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 CONTAINER LABELING**

Submit final printed carton and container labeling that are identical to the enclosed carton and container labeling and carton and container labeling submitted on July 24, 2019, as soon as they are available, but no more than 30 days after they are printed. Please submit these labeling 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 (April 2018, Revision 5). For administrative purposes, designate this submission “Final Printed Carton and Container Labeling for approved NDA 210134.” Approval of this submission by FDA is not required before the labeling is used.

**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.

We are waiving the pediatric study requirement for ages 0 to less than 1 year because necessary studies are impossible or highly impracticable. This is because of the small number of pediatric patients.

We are deferring submission of your pediatric study for ages 1 year to less than 4 years for this application because pediatric studies should be delayed until additional safety or effectiveness data have been collected.

Your deferred pediatric study required by section 505B(a) of the FDCA are required postmarketing study. The status of this postmarketing study must be reported annually according to 21 CFR 314.81 and section 505B(a)(4)(C) of the FDCA. This required study is listed below.

<table>
<thead>
<tr>
<th>Reference ID</th>
<th>Study Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>3621-1</td>
<td>An open-label pediatric study to evaluate safety, efficacy, and pharmacokinetics of BAQSIMI in pediatric patients age 1 year to less than 4 years.</td>
</tr>
</tbody>
</table>

Draft Protocol Submission: September 2020
Final Protocol Submission: March 2021  
Study Completion: June 2026  
Final Report Submission: December 2026  

Submit the protocols to your IND 110674 with a cross-reference letter to this NDA.  

Reports of this/these required pediatric postmarketing study(ies) must be submitted as a new drug application (NDA) or as a supplement to your approved NDA with the proposed labeling changes you believe are warranted based on the data derived from these studies. When submitting the reports, please clearly mark your submission "SUBMISSION OF REQUIRED PEDIATRIC ASSESSMENTS" in large font, bolded type at the beginning of the cover letter of the submission.  

We note that you have fulfilled the pediatric study requirement for ages 4 years to less than 17 years for this application.  

**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 Package Insert (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:  

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](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](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](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 Meghna M. Jairath, Pharm.D., Regulatory Project Manager, at (301) 796-4267.

Sincerely,

{See appended electronic signature page}

Lisa B. Yanoff, M.D.
Director (Acting)
Division of Metabolism and Endocrinology Products
Office of Drug Evaluation II
Center for Drug Evaluation and Research

ENCLOSURES:

Content of Labeling
Prescribing Information
Patient Package Insert
Instructions for Use
Carton and Container 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/

LISA B YANOFF
07/24/2019 03:53:08 PM