Dear Dr. Pincus:

Please refer to your supplemental Biologics License Application (sBLA) dated December 20, 2018, received December 20, 2018, and your amendments, submitted under section 351(a) of the Public Health Service Act for STELARA (ustekinumab) Injection.

This Prior Approval supplemental biologics license application provides for the addition of the indication of treatment of adults with moderately to severely active ulcerative colitis.

**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.

**WAIVER OF HIGHLIGHTS ½ PAGE LENGTH REQUIREMENT FOR HIGHLIGHTS**

Please note that we have previously granted a waiver of the requirements of 21 CFR 201.57(d)(8) regarding the length of Highlights of Prescribing Information.

**CONTENT OF LABELING**

As soon as possible, but no later than 14 days from the date of this letter, submit, via the FDA automated drug registration and listing system (eLIST), the content of labeling [21 CFR 601.14(b)] in structured product labeling (SPL) format, as described at FDA.gov,¹ that is identical to the enclosed labeling (text for the Prescribing Information, Instructions for Use, and Medication Guide) and include the labeling changes proposed in any pending “Changes Being Effected” (CBE) supplements.

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.\(^2\)

The SPL will be accessible via publicly available labeling repositories.

Also within 14 days, amend all pending supplemental applications that include labeling changes for this BLA, including pending “Changes Being Effected” (CBE) supplements, for which FDA has not yet issued an action letter, with the content of labeling [21 CFR 601.12(f)] 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).

**SENTINEL/ARIA NOTIFICATION**

The Food and Drug Administration Amendments Act of 2007 (FDAAA) required FDA to establish a national electronic system to monitor the safety of FDA-regulated medical products. In fulfillment of this mandate, FDA established the Sentinel System, which enables FDA to proactively monitor drug safety using electronic health data from multiple data sources that contribute to the Sentinel Distributed Database.

FDA plans to evaluate STELARA (ustekinumab) in the Sentinel System as part of the implementation of section 505(o) of the FDCA. We have determined that the new pharmacovigilance system, Sentinel’s Active Risk Identification and Analysis (ARIA) System, established under section 505(k)(3) of the FDCA, is sufficient to assess the known serious risk: serious infection.

The ARIA safety assessment will be posted to the Sentinel website at this location: [https://www.sentinelinitiative.org](https://www.sentinelinitiative.org). Once there is sufficient product uptake to support an analysis, an analysis plan will be posted online. After the analysis is complete, FDA will also post the results on the Sentinel website. FDA will notify you prior to posting the analysis plan and prior to posting the results.

**REQUIRED PEDIATRIC ASSESSMENTS**

Because this drug product for this indication has an orphan drug designation, you are exempt from this requirement.

---

\(^2\) We update guidances periodically. For the most recent version of a guidance, check the FDA Guidance Documents Database [https://www.fda.gov/RegulatoryInformation/Guidances/default.htm](https://www.fda.gov/RegulatoryInformation/Guidances/default.htm).
POSTMARKETING REQUIREMENTS UNDER 505(o)

Section 505(o)(3) of the Federal Food, Drug, and Cosmetic Act (FDCA) authorizes FDA to require holders of approved drug and biological product applications to conduct postmarketing studies and clinical trials for certain purposes, if FDA makes certain findings required by the statute.

We have determined that an analysis of spontaneous postmarketing adverse events reported under subsection 505(k)(1) of the FDCA will not be sufficient to assess the known serious risk of malignancy and the known serious risk of opportunistic infections. Furthermore, the new pharmacovigilance system that FDA is required to establish under section 505(k)(3) of the FDCA will not be sufficient to assess these serious risks.

Therefore, based on appropriate scientific data, FDA has determined that you are required to conduct the following:

3736-1 A long-term, postmarketing, observational study to assess the long-term safety of STELARA (ustekinumab) versus other therapies used in the treatment of adults with moderate to severe ulcerative colitis. The study’s primary outcome is malignancy. Secondary outcomes include, but are not limited to, opportunistic infections (e.g., tuberculosis [TB]). Specify concise case definitions and provide outcome validation for both primary and secondary outcomes. Describe and justify the choice of appropriate comparator population(s) and estimated background rate(s) relative to ustekinumab-exposed patients; clearly define the primary comparator population for the primary objective. Design the study around a testable hypothesis to assess, with sufficient sample size and power, a clinically meaningful increase in malignancy risk above the comparator background rate, with a pre-specified statistical analysis method. For the ustekinumab-exposed and comparator(s), the study drug initiation period should be clearly defined, including any exclusion and inclusion criteria. Ensure adequate number of patients with at least 18 months of
ustekinumab exposure at the end of the study. Follow for a period of at least 7 years.

The ongoing observational study in patients with Crohn’s disease with the same objectives, may be amended to also enroll patients with ulcerative colitis.

The timetable you submitted on September 27, 2019 states that you will conduct this study according to the following schedule:

Draft Protocol Submission: 02/2020
Final Protocol Submission: 09/2020
Interim Report: 12/2025
Study Completion: 08/2029
Final Report Submission: 08/2030

Submit the protocol(s) to your IND 124512, with a cross-reference letter to this BLA. Submit nonclinical and chemistry, manufacturing, and controls protocols and all postmarketing final report(s) to your BLA. Prominently identify the submission with the following wording in bold capital letters at the top of the first page of the submission, as appropriate: “Required Postmarketing Protocol Under 505(o)”, “Required Postmarketing Final Report Under 505(o)”, “Required Postmarketing Correspondence Under 505(o)”.

Submission of the protocol(s) for required postmarketing observational studies to your IND is for purposes of administrative tracking only. These studies do not constitute clinical investigations pursuant to 21 CFR 312.3(b) and therefore are not subject to the IND requirements under 21 CFR part 312 or FDA’s regulations under 21 CFR parts 50 (Protection of Human Subjects) and 56 (Institutional Review Boards).

Section 505(o)(3)(E)(ii) of the FDCA requires you to report periodically on the status of any study or clinical trial required under this section. This section also requires you to periodically report to FDA on the status of any study or clinical trial otherwise undertaken to investigate a safety issue. Section 506B of the FDCA, as well as 21 CFR 601.70 requires you to report annually on the status of any postmarketing commitments or required studies or clinical trials.

FDA will consider the submission of your annual report under section 506B and 21 CFR 601.70 to satisfy the periodic reporting requirement under section 505(o)(3)(E)(ii) provided that you include the elements listed in 505(o) and 21 CFR 601.70. We remind you that to comply with 505(o), your annual report must also include a report on the status of any study or clinical trial otherwise undertaken to investigate a safety issue. Failure to submit an annual report for studies or clinical trials...
required under 505(o) on the date required will be considered a violation of FDCA section 505(o)(3)(E)(ii) and could result in enforcement action.

POSTMARKETING COMMITMENTS SUBJECT TO REPORTING REQUIREMENTS UNDER SECTION 506B

We remind you of your postmarketing commitments:

3736-2 A one-year, randomized, controlled, blinded trial to evaluate the safety, efficacy, and pharmacokinetics of Stelara (ustekinumab) in pediatric patients 2 to 17 years of age with moderately to severely active ulcerative colitis.

The timetable you submitted on September 27, 2019, states that you will conduct this trial according to the following schedule:

Final Protocol Submission: 05/2020
Trial Completion: 03/2025
Final Report Submission: 09/2025

3736-3 A multi-center, open-label extension study to evaluate the long-term safety of Stelara (ustekinumab) in pediatric patients 2 to 17 years of age with moderately to severely active ulcerative colitis who participated in PMC 3736-2.

The timetable you submitted on October 17, 2019, states that you will conduct this trial according to the following schedule:

Final Protocol Submission: 09/2020
Trial Completion: 03/2026
Final Report Submission: 09/2026

U.S. Food and Drug Administration
Silver Spring, MD 20993
www.fda.gov

Reference ID: 4508126
A clinical trial to assess whether ustekinumab alters the metabolism or pharmacokinetics of cytochrome P450 (CYP) substrates in UC patients treated with ustekinumab (e.g., using a cocktail of relevant CYP probe drugs).

The ongoing trial in patients with Crohn’s disease with the same objectives, may be amended to also enroll patients with ulcerative colitis.

The timetable you submitted on October 10, 2019, states that you will conduct this trial according to the following schedule:

- **Final Protocol Submission**: 03/2020
- **Trial Completion**: 08/2024
- **Final Report Submission**: 02/2025

Submit clinical protocols to your IND 124512 for this product. Submit nonclinical and chemistry, manufacturing, and controls protocols and all postmarketing final reports to this BLA. In addition, under 21 CFR 601.70 you should include a status summary of each commitment in your annual progress report of postmarketing studies to this BLA. The status summary should include expected summary completion and final report submission dates, any changes in plans since the last annual report, and, for clinical studies/trials, number of patients entered into each study/trial. All submissions, including supplements, relating to these postmarketing commitments should be prominently labeled “Postmarketing Commitment Protocol,” “Postmarketing Commitment Final Report,” or “Postmarketing Commitment Correspondence.”

**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 to:

U.S. Food and Drug Administration
Silver Spring, MD 20993
www.fda.gov
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 *Providing Regulatory Submissions in Electronic and Non-Electronic Format—Promotional Labeling and Advertising Materials for Human Prescription Drugs.*

As required under 21 CFR 601.12(f)(4), 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 FDA.gov. Information and Instructions for completing the form can be found at FDA.gov. For more information about submission of promotional materials to the Office of Prescription Drug Promotion (OPDP), see FDA.gov.

**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, contact Kelly Richards, Senior Regulatory Health Project Manager, at (240) 402-4276 or kelly.richards@fda.hhs.gov

Sincerely,

{See appended electronic signature page}

Jessica J. Lee, MD, MMSc
Associate Director
Division of Gastroenterology and Inborn Errors Products
Office of Drug Evaluation III
Center for Drug Evaluation and Research

---

3 When final, this guidance will represent the FDA’s current thinking on this topic. For the most recent version of a guidance, check the FDA guidance web page at https://www.fda.gov/RegulatoryInformation/Guidances/default.htm.
4 http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083570.pdf
5 http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf
6 http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm

U.S. Food and Drug Administration
Silver Spring, MD 20993
www.fda.gov
ENCLOSURE(S):
- Content of Labeling
  - Prescribing Information
  - Medication Guide
  - Instructions for Use
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/

JESSICA J LEE
10/18/2019 02:53:34 PM