



BLA 125469/S-033

**SUPPLEMENT APPROVAL  
FULFILLMENT OF POSTMARKETING  
REQUIREMENT**

Eli Lilly and Company  
Attention: Jennie L. Walgren, PhD  
Advisor, Global Regulatory Affairs - US  
Lilly Corporate Center  
Drop Code 2543  
Indianapolis, IN 46285

Dear Dr. Walgren:

Please refer to your supplemental biologics license application (sBLA), dated April 19, 2019, received April 22, 2019, and your amendments, submitted under section 351(a) of the Public Health Service Act for Trulicity (dulaglutide) injection.

This Prior Approval supplemental biologics application provides for the addition of efficacy and safety information to the Prescribing Information, including a new indication for reduction of major adverse cardiovascular events in adults with type 2 diabetes mellitus, based on the clinical data from Study GBDJ (REWIND), a Phase 3 cardiovascular outcomes trial.

**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.

**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,<sup>1</sup> that is identical to the enclosed labeling (text for the Prescribing Information and Medication Guide) and include the labeling changes proposed in any pending "Changes Being Effectuated" (CBE) supplements.

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<sup>1</sup> <http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm>

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*.<sup>2</sup>

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 Effectuated" (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).

### **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(s) in pediatric patients unless this requirement is waived, deferred, or inapplicable.

We are waiving the pediatric study requirement for this application because necessary studies are impossible or highly impracticable.

### **FULFILLMENT OF POSTMARKETING REQUIREMENT**

This supplemental application includes a final report for the following postmarketing requirement listed in the September 18, 2014, approval letter for BLA 125469.

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| 2781-5 | A randomized, double-blind, placebo-controlled trial evaluating the effect of Trulicity (dulaglutide) on the incidence of major adverse cardiovascular events (MACE) in patients with type 2 diabetes mellitus. The primary objective of the trial should be to demonstrate that the upper bound of the 2-sided 95% confidence interval for the estimated risk ratio comparing the incidence of MACE (non-fatal myocardial infarction, non-fatal stroke, and cardiovascular death) observed with dulaglutide to that observed in the placebo group is less than 1.3. The trial must also assess the following adverse events: thyroid cancer, pancreatic cancer, pancreatitis, immune-mediated reactions (including serious hypersensitivity reactions), |
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<sup>2</sup> 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>.

serious hypoglycemic events, hepatic events, serious gastrointestinal events, clinically significant supraventricular arrhythmias, clinically significant conduction disorders and worsening renal function.

We have reviewed your submission and conclude that the above requirement was fulfilled.

We remind you that there are postmarketing requirements and postmarketing commitments listed in the September 18, 2014, approval letter that are still open.

### **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:

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 *Providing Regulatory Submissions in Electronic and Non-Electronic Format—Promotional Labeling and Advertising Materials for Human Prescription Drugs*.<sup>3</sup>

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.<sup>4</sup> Information and Instructions for completing the form can be found at FDA.gov.<sup>5</sup> For more information about submission of promotional materials to the Office of Prescription Drug Promotion (OPDP), see FDA.gov.<sup>6</sup>

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<sup>3</sup> 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>.

<sup>4</sup> <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083570.pdf>

<sup>5</sup> <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf>

<sup>6</sup> <https://www.fda.gov/about-fda/center-drug-evaluation-and-research-cder/office-prescription-drug-promotion-opdp>

All promotional materials for your drug product that include representations about your drug product must be promptly revised to make it consistent with the labeling changes approved in this supplement, including any new safety information [21 CFR 601.12(a)(4)]. The revisions to your promotional materials should include prominent disclosure of the important new safety information that appears in the revised labeling. Within 7 days of receipt of this letter, submit your statement of intent to comply with 21 CFR 601.12(a)(4) to the address above, by fax to 301-847-8444, or 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*.<sup>7</sup>

### **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 Peter Franks, Regulatory Project Manager, at (240) 402-4197.

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
  - Medication Guide
  - Instructions for Use (versions approved September 21, 2018)

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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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LISA B YANOFF  
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