



BLA 125514/S-48

## SUPPLEMENT APPROVAL

Merck Sharp & Dohme Corp.,  
a subsidiary of Merck & Co., Inc.  
Attention: Seema Betigeri, Ph.D.  
Director, Global Regulatory Affairs  
126 E. Lincoln Avenue, P.O. Box 2000 RY34-B293  
Rahway, NJ 07065-0900

Dear Dr. Betigeri:

Please refer to your supplemental biologics license application, dated and received August 27, 2018, and your amendments received October 1, and 24, 2018, November 27, 2018, January 11, 2019, February 25, 2019, March 15, 2019, May 8, 2019, June 28, 2019, February 20, 2020, August 19, 2020, October 16, 2020, November 3, and 9, 2020, submitted under section 351(a) of the Public Health Service Act for Keytruda (pembrolizumab).

We also refer to our July 18, 2018, supplement request proposing changes to the approved labeling for the DOSAGE AND ADMINISTRATION, Dose Modifications subsection and the WARNINGS AND PRECAUTIONS, Immune-mediated Adverse Reactions subsections of the U.S. prescribing information.

We further reference our January 27, 2019, labeling discussion correspondence, which also included our purpose and goal to harmonize programmed death-ligand 1 (PD-L1) blocking antibodies and programmed cell death protein 1 (PD-1) blocking antibodies with respect to immune-mediated adverse reactions across all PDL1/PD1 antibody drug products.

This Prior Approval supplemental biologics application provides for revisions to the U.S. prescribing information and medication guide to improve the presentation of drug safety information regarding immune-mediated adverse reactions across all Food and Drug Administration (FDA) approved programmed death-ligand 1 and programmed cell death protein 1 blocking antibody labels. In addition, editorial and formatting changes were made throughout the U.S. package insert for consistency with current labeling practices.

### **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,<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 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*.<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 Biologics License Application, 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).

## **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.

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

<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>.

Because none of these criteria apply to your application, you are exempt from this requirement.

## **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>

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

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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>

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 Biologics License Application (in 21 CFR 600.80 and in 21 CFR 600.81).

If you have any questions you may contact Felicia Diggs, Safety Regulatory Project Manager, at (240) 402-4932 or via email at [Felicia.diggs@fda.hhs.gov](mailto:Felicia.diggs@fda.hhs.gov).

Sincerely,

*{See appended electronic signature page}*

Jefferey Summers, MD  
Associate Director for Translational Sciences  
Office of Oncologic Diseases  
Center for Drug Evaluation and Research

### ENCLOSURE:

- Content of Labeling
  - Prescribing Information
  - Medication Guide

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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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JEFFERY L SUMMERS  
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