



NDA 201699/S-012

**SUPPLEMENT APPROVAL
FULFILLMENT OF POSTMARKETING REQUIREMENT**

Cubist Pharmaceuticals LLC
c/o Merck Sharp & Dohme Corp., a subsidiary of Merck & Co., Inc.
Attention: Sandra Lynn Wood, PhD
Director, Global Regulatory Affairs
P.O. Box 1000, UG2CD-48
351 North Sumneytown Pike
North Wales, PA 19454

Dear Dr. Wood:

Please refer to your supplemental new drug application (sNDA) dated July 24, 2019, received July 24, 2019, and your amendments, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for DIFICID (fidaxomicin) tablets, 200 mg.

This Prior Approval sNDA expands the approved indication for the treatment of *Clostridioides difficile*-associated diarrhea (CDAD) in adults to include pediatric patients from 6 months to less than 18 years of age and provides updates to sections of the prescribing information (PI) relevant to the use of fidaxomicin in pediatric patients from 6 months to less than 18 years of age.

Additionally, revisions were made to **WARNINGS AND PRECAUTIONS Section (5), Not for Use in Infections Other than *C. difficile*-Associated Diarrhea subsection (5.2)**, to clarify that fidaxomicin is not to be used for the treatment of infections other than CDAD.

Further, the current **Patient Package Insert** has been updated to reflect changes made to the PI attached to this letter.

This approval also fulfills postmarketing requirement (PMR) 1757-002 listed in the May 27, 2011, approval letter for NDA 201699.

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 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 FDA.gov.¹ Content of labeling must be identical to the enclosed labeling (text for the Prescribing Information and Patient Package Insert) 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*.²

The SPL will be accessible via publicly available labeling repositories.

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 6 months because necessary studies are impossible or highly impractical as high rates of *C. difficile* colonization and co-infection with other diarrheal pathogens make the diagnosis of CDAD and evaluation of treatment outcomes in this population difficult.

You have fulfilled the pediatric study requirement for ages 6 months to less than 18 years for this application.

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

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>.

FULFILLMENT OF POSTMARKETING REQUIREMENT

We have received your submission dated July 24, 2019, for the following PMR listed in the May 27, 2011 approval letter.

- 1757-002** Conduct a prospective, randomized clinical trial to demonstrate safety and effectiveness of DIFICID (fidaxomicin) compared to vancomycin in pediatric patients (6 months to less than 18 years of age) with *C. difficile*-associated diarrhea.

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

This completes all your postmarketing requirements and postmarketing commitments acknowledged in our May 27, 2011 letter.

PROMOTIONAL MATERIALS

You may request advisory comments on proposed introductory advertising and promotional labeling. To do so, submit the following, in triplicate, (1) a cover letter requesting advisory comments, (2) the proposed materials in draft or mock-up form with annotated references, and (3) the Prescribing Information to:

OPDP Regulatory Project Manager
Food and Drug Administration
Center for Drug Evaluation and Research
Office of Prescription Drug Promotion (OPDP)
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*.³

You must submit final promotional materials and Prescribing Information, accompanied by a Form FDA 2253, at the time of initial dissemination or publication [21 CFR 314.81(b)(3)(i)]. Form FDA 2253 is available at FDA.gov.⁴ Information and

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>

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

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 Kristine Park, PhD, RAC, Senior Regulatory Health Project Manager, at (301) 796-0471.

Sincerely,

{See appended electronic signature page}

Dmitri Iarikov, MD, PhD
Deputy Director
Division of Anti-Infectives
Office of Infectious Diseases
Center for Drug Evaluation and Research

ENCLOSURES:

- Content of Labeling
 - Prescribing Information
 - Patient Package Insert

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

⁶ <http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm>

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/

DMITRI IARIKOV
01/24/2020 04:22:40 PM