

NDA 203100/S-35

## SUPPLEMENT APPROVAL

Gilead Sciences, Inc.  
Attention: Jamie Lam, MBS  
Associate II, Regulatory Affairs  
333 Lakeside Drive  
Foster City, CA 94404

Dear Ms. Lam:

Please refer to your supplemental new drug application (sNDA) dated and received February 21, 2020, and your amendments, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for STRIBILD (elvitegravir, cobicistat, emtricitabine, and tenofovir disoproxil fumarate), tablet.

This Prior Approval supplemental new drug application provides for the following changes to the Stribild US Prescribing Information (USPI):

- WARNINGS AND PRECAUTIONS, Risk of Serious Adverse Reactions or Loss of Virologic Response Due to Drug Interactions, is updated with additional information regarding drugs that have active metabolite(s) formed by CYP3A and possible loss of their therapeutic effect
- WARNINGS AND PRECAUTIONS, Immune Reconstitution Syndrome, is updated with addition of autoimmune hepatitis
- DRUG INTERACTIONS:
  - Potential for STRIBILD to Affect Other Drugs is updated with information for drugs that have active metabolite(s) formed by CYP3A and possible loss of their therapeutic effect
  - Table 5 is updated with the addition of “Medications or Oral Supplements Containing Polyvalent Cations” and deletion of “Acid Reducing Agents” to address a drug interaction between elvitegravir and polyvalent cations
  - Table 5 is updated with addition of a new drug class “Antiplatelets” and the drugs ticagrelor and clopidogrel
  - Drugs without Clinically Significant Interactions with STRIBILD, is updated with addition of prasugrel (active metabolite)
- USE IN SPECIFIC POPULATIONS, Pregnancy section is updated with data from the current Antiretroviral Pregnancy Registry Interim Report

### **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**

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 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.<sup>1</sup> Content of labeling must be identical to the enclosed labeling (text for the Prescribing Information and Patient Package Insert), with the addition of any labeling changes in pending “Changes Being Effected” (CBE) supplements, 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*.<sup>2</sup>

The SPL will be accessible from publicly available labeling repositories.

Also within 14 days, amend all pending supplemental applications that include labeling changes for this NDA, including CBE supplements for which FDA has not yet issued an action letter, with the content of labeling [21 CFR 314.50(l)(1)(i)] 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).

## **PROMOTIONAL MATERIALS**

You may request advisory comments on proposed introductory advertising and promotional labeling. For information about submitting promotional materials, see the final guidance for industry *Providing Regulatory Submissions in Electronic and Non-Electronic Format-Promotional Labeling and Advertising Materials for Human Prescription Drugs*.<sup>3</sup>

You must submit final promotional materials and Prescribing Information, accompanied by a Form FDA 2253, at the time of initial dissemination or publication

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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>.

<sup>3</sup> For the most recent version of a guidance, check the FDA guidance web page at <https://www.fda.gov/media/128163/download>.

[21 CFR 314.81(b)(3)(i)]. Form FDA 2253 is available at [FDA.gov](http://FDA.gov).<sup>4</sup> Information and Instructions for completing the form can be found at [FDA.gov](http://FDA.gov).<sup>5</sup>

All promotional materials that include representations about your drug product must be promptly revised to be consistent with the labeling changes approved in this supplement, including any new safety information [21 CFR 314.70(a)(4)]. The revisions in 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 314.70(a)(4).

### **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 Nina Mani, Senior Regulatory Project Manager, at 301-796-1500.

Sincerely,

*{See appended electronic signature page}*

Debra Birnkrant, MD  
Director  
Division of Antivirals  
Office of Infectious Diseases  
Center for Drug Evaluation and Research

### ENCLOSURE(S):

- Content of Labeling
  - Prescribing Information
  - Patient Package Insert

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<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>

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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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POONAM MISHRA  
08/21/2020 01:32:57 PM  
on behalf of Division Director