

NDA 203214/S-026

### SUPPLEMENT APPROVAL FULFILLMENT OF POSTMARKETING REQUIREMENT

PF PRISM C.V., a wholly owned subsidiary of Pfizer Inc. 500 Arcola Road Collegeville, PA 19426

Attention: Alicia Holsey, MS, RAC Senior Manager, Pfizer Global Regulatory Affairs

Dear Ms. Holsey:

Please refer to your supplemental new drug application (sNDA) dated March 26, 2020, received March 26, 2020, and your amendments, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Xeljanz (tofacitinib) Oral Tablet.

This Prior Approval supplemental new drug application provides for addition of the indication of treatment of active polyarticular course juvenile idiopathic arthritis (pcJIA) in patients 2 years of age and older.

### **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 1/2 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(I)] 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, Instructions for Use, and Medication Guide), 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.

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

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(I)(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).

# **CARTON AND CONTAINER LABELING**

Submit final printed carton and container labeling that are identical to the enclosed carton and container labeling, as soon as they are available, but no more than 30 days after they are printed. Please submit these labeling electronically according to the guidance for industry *Providing Regulatory Submissions in Electronic Format* — *Certain Human Pharmaceutical Product Applications and Related Submissions Using the eCTD Specifications*. For administrative purposes, designate this submission "**Final Printed Carton and Container Labeling for approved NDA 203214/S-026**." Approval of this submission by FDA is not required before the labeling is used.

## 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.

This product is appropriately labeled for use in patients 2 years of age and older for this indication. Therefore, no additional studies are needed in this pediatric group (pcJIA).

<sup>&</sup>lt;sup>2</sup> We update guidances periodically. For the most recent version of a guidance, check the FDA Guidance Documents Database <u>https://www.fda.gov/RegulatoryInformation/Guidances/default.htm</u>.

### FULFILLMENT OF POSTMARKETING REQUIREMENTS

Supplemental new drug application (sNDA) 203214/S-026 provides data to address the following post-marketing requirement listed in the approval letter for new drug application 203214 dated November 6, 2012.

1934-2 A randomized withdrawal, double-blind, placebo-controlled trial to evaluate the efficacy and safety of tofacitinib in children from 2 to less than 18 years of age with polyarticular-course juvenile idiopathic arthritis.

We have reviewed your submission and conclude that the above requirements were fulfilled.

We remind you that there are postmarketing requirements that are still open for this application.

#### POSTMARKETING REQUIREMENTS UNDER 505(o)

Section 505(o)(3) of the 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 known serious risks of malignancies and serious infections (including opportunistic infections), assess a signal of a serious risk of thrombosis, and identify an unexpected serious risk of effects on growth.

Furthermore, the active postmarket risk identification and analysis system as available 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:

3944-1 Conduct a long-term observational safety study in pediatric patients 2-17 years of age with polyarticular-course JIA (pcJIA) treated with tofacitinib to evaluate for the risk of malignancies, serious infections (including opportunistic infections), thrombosis, and effects on growth. The study should include a control group of pediatric pcJIA patients treated with other pcJIA medications as standard of care. Patients should be followed for 5 years.

The timetable you submitted on September 22, 2020 states that you will conduct this study according to the following schedule:

Draft Protocol Submission:	03/2021
Final Protocol Submission:	07/2021
Trial Completion:	02/2030
Final Report Submission:	09/2030

3944-2 Conduct a nonclinical juvenile animal toxicity study to address the potential for tofacitinib to adversely affect bone development and growth. Effects on bone development and growth should be assessed by histopathological examination. Other appropriate methods might be included to follow up on any findings as deemed necessary. The study should include a recovery period to address if any observed adverse findings are reversible.

The timetable you submitted on September 16, 2020 states that you will conduct this study according to the following schedule:

Draft Protocol Submission:	11/2020
Final Protocol Submission:	01/2021
Trial Completion:	07/2021
Final Report Submission:	10/2021

FDA considers the term *final* to mean that the applicant has submitted a protocol, the FDA review team has sent comments to the applicant, and the protocol has been revised as needed to meet the goal of the study or clinical trial.<sup>3</sup>

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 314.81(b)(2)(vii) requires you to report annually on the status of any postmarketing commitments or required studies or clinical trials.

<sup>3</sup> See the guidance for Industry *Postmarketing Studies and Clinical Trials—Implementation of Section 505(o)(3) of the Federal Food, Drug, and Cosmetic Act (October 2019).* https://www.fda.gov/RegulatoryInformation/Guidances/default.htm.

FDA will consider the submission of your annual report under section 506B and 21 CFR 314.81(b)(2)(vii) 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 314.81(b)(2)(vii). 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.

### **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>4</sup>

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.<sup>5</sup> Information and Instructions for completing the form can be found at FDA.gov.<sup>6</sup>

#### **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 Elaine Sit, Regulatory Project Manager, at (301) 796-5073.

Sincerely,

{See appended electronic signature page}

Nikolay P. Nikolov, MD Director (Acting) Division of Rheumatology and Transplant Medicine Office of Immunology and Inflammation Center for Drug Evaluation and Research

ENCLOSURE(S):

<sup>5</sup> <u>http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083570.pdf</u> <sup>6</sup> http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf

<sup>&</sup>lt;sup>4</sup> For the most recent version of a guidance, check the FDA guidance web page at <u>https://www.fda.gov/media/128163/download</u>.

- Content of Labeling
  - Prescribing Information
    Medication Guide

  - o 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/

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