Dear Dr. Fein:

Please refer to your supplemental new drug application (sNDA) dated and received May 28, 2020, and your amendments, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Rinvoq (upadacitinib) tablets.

This Prior Approval supplemental new drug application provides for the addition of the indication of treatment of adults with active psoriatic arthritis who have had an inadequate response or intolerance to one or more TNF blockers to the prescribing information.

This Prior Approval sNDA also provides for addition of statement about the higher risk of herpes zoster in patients treated with RINVOQ in Japan to the Warning and Precautions Section 5.1 (Viral Reactivation) as proposed in Supplement 005.

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 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.

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.\(^2\)

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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](https://www.fda.gov/RegulatoryInformation/Guidances/default.htm).
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).

**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 birth to less than 5 years because necessary studies are impossible or highly impracticable. This is because of the rarity of the diagnosis of juvenile psoriatic arthritis in this age group.

We are deferring submission of your pediatric study for psoriatic arthritis for ages 5 to less than 18 years for this application because this product is ready for approval for use in adults and the pediatric study has not been completed.

Your deferred pediatric study required by section 505B(a) of the Federal Food, Drug, and Cosmetic Act/FDCA is required postmarketing study. The status of this postmarketing study must be reported annually according to 21 CFR 314.81 and section 505B(a)(4)(C) of the FDCA. This required study is listed below.

4201-1  Provide PK and safety information to support the pediatric assessment of upadacitinib for the treatment of juvenile psoriatic arthritis (jPsA) in children 5 to 17 years of age.

**Final Report Submission:** 10/2026

U.S. Food and Drug Administration
Silver Spring, MD 20993
www.fda.gov

Reference ID: 4904585
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.³

Submit the protocol(s) to your IND 114717, with a cross-reference letter to this NDA. 
Reports of this required pediatric postmarketing study must be submitted as an NDA or 
as a supplement to your approved NDA with the proposed labeling changes you believe 
are warranted based on the data derived from this study. When submitting the reports, 
please clearly mark your submission "SUBMISSION OF REQUIRED PEDIATRIC 
ASSESSMENTS" in large font, bolded type at the beginning of the cover letter of the 
submission.

**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.*⁴

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

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 Cindy Chee, Regulatory Project Manager, at 301-796- 
0889.

³ 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). 

⁴ For the most recent version of a guidance, check the FDA guidance web page at 
https://www.fda.gov/media/128163/download.

⁵ http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083570.pdf

⁶ http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf

U.S. Food and Drug Administration 
Silver Spring, MD 20993 
www.fda.gov
Sincerely,

{See appended electronic signature page}

Nikolay Nikolov, MD
Director
Division of Rheumatology and Transplant Medicine
Office of Immunology and Inflammation
Center for Drug Evaluation and Research

ENCLOSURE(S):
  • Content of Labeling
    o Prescribing Information
    o Medication Guide
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/

NIKOLAY P NIKOLOV
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