

NDA 212888/S-001

SUPPLEMENT APPROVAL

ViiV Healthcare Company
Attention: Elizabeth Austin, PhD
Senior Director, Global Regulatory Affairs
Five Moore Drive
PO BOX 13398
Research Triangle, NC 27709

Dear Dr. Austin:¹

Please refer to your supplemental new drug application (sNDA) dated and received February 24, 2021, and your amendments, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Cabenuva (cabotegravir extended-release injectable suspension; rilpivirine extended-release injectable suspension)

This Prior Approval supplemental new drug application updates the approved USPI with week 48 data from ATLAS-2M and provides for the following:

- New dosage regimen of every-2-month gluteal intramuscular injections of Cabenuva as a complete regimen for the treatment of HIV-1 infection in adults to replace the current antiretroviral regimen in those who are virologically suppressed (HIV-1 RNA <50 copies per mL) on a stable antiretroviral regimen with no history of treatment failure and with no known or suspected resistance to either cabotegravir or rilpivirine
- Updates to ADVERSE REACTIONS, Clinical Trials Experience to include additional safety data as well as injection-associated adverse reactions based on week 48 data from ATLAS-2M
- Updates to CLINICAL PHARMACOLOGY, Pharmacokinetics and Microbiology section of the labeling with additional pharmacokinetic data for the every-2-month dosage regimen as well as virologic resistance data based on ATLAS-2M data
- Updates to CLINICAL STUDIES, Clinical Trials in Adults for Treatment of HIV-1 infection with new clinical trial data to support the new dosage regimen
- Updates to PATIENT COUNSELING INFORMATION to provide advice on Cabenuva being administered as a every-2-month dosage regimen after use of lead-in therapy with oral Vocabria and Edurant

¹ 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>.

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.² Content of labeling must be identical to the enclosed labeling (Prescribing Information, Patient Package Insert and Instructions for Use), 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*.³

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

² <http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm>

³ 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>.

the claimed indication in pediatric patients unless this requirement is waived, deferred, or inapplicable.

We are waiving the pediatric study(ies) requirement for this application from birth to less than 2 years of age because necessary studies are impossible or highly impractical due to the success of interventions preventing mother to child transmission of HIV-1 infections and limited population available for recruitment in this age group.

We are deferring submission of your pediatric studies for ages 2 to less than 18 years of age and weighing at least 10 kg and higher for this application because this product is ready for approval for use in adults and the pediatric studies have not been completed.

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

4221-1 Conduct a study in subjects weighing 35 kg and higher (approximately 12 to less than 18 years of age) who are HIV-1 infected, virologically suppressed (HIV-1 RNA <50 copies/mL) and on a stable antiretroviral regimen at the time of enrollment, to assess the pharmacokinetics, safety and tolerability, and antiviral activity of CABENUVA. Study participants must be monitored for a minimum of 24 weeks to assess safety and durability of antiviral response.

Final Protocol Submission: N/A
Study Completion: 7/2022
Final Report Submission: 1/2023

4221-2 Conduct a study in subjects weighing 25 kg to less than 35 kg (approximately 6 to less than 12 years of age) who are HIV-1 infected, virologically suppressed (HIV-1 RNA <50 copies/mL) and on a stable antiretroviral regimen at the time of enrollment, to assess the pharmacokinetics, safety and tolerability, and antiviral activity of CABENUVA. Study participants must be monitored for a minimum of 24 weeks to assess safety and durability of antiviral response.

Final Protocol Submission: 8/2022
Study Completion: 6/2023
Final Report Submission: 12/2023

4221-3 Conduct a study in subjects weighing 10 kg to less than 25 kg (approximately 2 to less than 6 years of age) who are HIV-1 infected, virologically suppressed (HIV-1 RNA <50 copies/mL) and on a stable antiretroviral regimen at the time of enrollment, to assess the pharmacokinetics, safety and tolerability, and antiviral activity of CABENUVA. Study participants must be monitored for a minimum of 24 weeks to assess safety and durability of antiviral response.

Final Protocol Submission: 8/2022
Study Completion: 12/2025
Final Report Submission: 6/2026

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.⁴

Submit the protocol(s) to your IND 109678, with a cross-reference letter to this NDA. Reports of these required pediatric postmarketing studies 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 these studies. 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.

POSTMARKETING COMMITMENTS SUBJECT TO REPORTING REQUIREMENTS UNDER SECTION 506B

We remind you of your postmarketing commitments:

4221-4 Submit the final report and datasets with Week 152 data for the ongoing trial ATLAS-2M, "A Phase IIIb, Randomized, Multicenter, Parallel-group, Non-inferiority, Open-label Study Evaluating the Efficacy, Safety, and Tolerability of Long-acting Cabotegravir Plus Long-acting Rilpivirine Administered Every 8 Weeks or Every 4 Weeks in HIV-1-infected Adults who are Virologically Suppressed."

The timetable you submitted on January 27, 2022, states that you will conduct this study according to the following schedule:

Study/Trial Completion: 06/2021
Final Report Submission: 05/2022

⁴ 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>.

Submit clinical protocols to your IND 109678 for this product. Submit nonclinical and chemistry, manufacturing, and controls protocols and all postmarketing final reports to this NDA. In addition, under 21 CFR 314.81(b)(2)(vii) and 314.81(b)(2)(viii) you should include a status summary of each commitment in your annual report to this NDA. The status summary should include expected summary completion and final report submission dates, any changes in plans since the last annual report, and, for clinical studies/trials, number of patients/subjects entered into each study/trial. All submissions, including supplements, relating to these postmarketing commitments should be prominently labeled “Postmarketing Commitment Protocol,” “Postmarketing Commitment Final Report,” or “Postmarketing Commitment Correspondence.”

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*.⁵

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.⁶ Information and Instructions for completing the form can be found at FDA.gov.⁷

REPORTING REQUIREMENTS

We remind you that you must comply with reporting requirements for an approved NDA (21 CFR 314.80 and 314.81).

⁵ For the most recent version of a guidance, check the FDA guidance web page at <https://www.fda.gov/media/128163/download>.

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

⁷ <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf>

If you have any questions, call Andrew Gentles, PharmD, BCPS, Senior Regulatory Project Manager, at (240) 402-5708 or the mainline 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
 - 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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