

NDA 213871

**NDA APPROVAL**

Pfizer Inc.  
Attention: Jennifer Weissert, PhD  
Director, Pfizer Global Regulatory Affairs  
300 Technology Square, 3<sup>rd</sup> Floor  
Cambridge, MA 02139

Dear Dr. Weissert:

Please refer to your new drug application (NDA) dated and received August 25, 2020, and your amendments, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Cibinqo (abrocitinib) tablets.

We acknowledge receipt of your major amendments dated March 18 and 31, 2021, which extended the goal date by three months.

This NDA provides for the use of Cibinqo (abrocitinib) tablets for the treatment of adults with refractory, moderate-to-severe atopic dermatitis whose disease is not adequately controlled with other systemic drug products, including biologics, or when use of those therapies is inadvisable.

### **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.

### **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 Medication Guide) 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>

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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>.

The SPL will be accessible via publicly available labeling repositories.

### **CARTON AND CONTAINER LABELING**

Submit final printed carton and container labeling that are identical to the enclosed carton and container labeling and carton and container labeling submitted on March 1, 2021, 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 213871.**” Approval of this submission by FDA is not required before the labeling is used.

### **DATING PERIOD**

Based on the stability data submitted to date, the expiry dating period for Cibinqo (abrocitinib) tablets shall be 24 months from the date of manufacture when stored at 20°C to 25°C (68°F to 77°); excursions permitted from 15°C to 30°C (59°F to 86°F).

### **ADVISORY COMMITTEE**

Your application for Cibinqo (abrocitinib) tablets was not referred to an FDA advisory committee because this drug is not the first in its class.

### **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 requirements for ages birth to less than 6 months of age because necessary studies are impossible or highly impracticable. This is because of the diagnostic uncertainty especially in children below 3 months of age.

We are deferring submission of your pediatric studies for ages 6 months to 17 years 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 FDCA. These required studies are listed below.

4217-1 Clinical trial B7451036 (TEEN) in adolescents ages 12 years to 17 years 11 months was completed after submission of the original abrocitinib NDA for the treatment of moderate-to-severe atopic dermatitis. Submit the final study report as a supplement to the NDA.

Final Protocol Submission: complete

Study Completion: complete

Final Report Submission: 5/2022

4217-2 Conduct a clinical trial in subjects 2 to 12 years of age with moderate-to-severe atopic dermatitis.

Final Protocol Submission: 9/2025

Study Completion: 6/2030

Final Report Submission: 12/2030

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>

Submit the protocol(s) to your IND 123554, 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 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 identify an unexpected serious risk for major adverse cardiovascular events (MACE), malignancy, and thrombosis. Additionally, it will not be sufficient to identify an unexpected serious

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<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>.

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risk for adverse pregnancy, fetal, or infant outcomes from the use of Cibinqo (abrocitinib) tablets during pregnancy.

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 studies:

- 4217-3 Conduct a prospective observational study (analyses conducted in patient cohorts enrolled prospectively and followed actively in accordance with a written protocol) to assess the long-term safety of abrocitinib treatment in U.S. adult patients with moderate-to-severe atopic dermatitis. Fully ascertain and centrally verify serious adverse events, Major Adverse Cardiovascular Events (myocardial infarction, stroke, cardiovascular death, and sudden death), malignancies (including lymphoma, lung cancer, and other malignancies), serious infections, opportunistic infections (including herpes zoster), retinal detachment, thrombosis (including deep venous thrombosis, pulmonary embolism and arterial thrombosis), hepatotoxicity (including drug induced liver injury) , and possibly other adverse events of special interest. For each adverse-event outcome separately, compare incidence in abrocitinib-treated patients against reference rates internally derived from analyses conducted in patients treated with dupilumab or other chronic systemic treatments for moderate-to-severe atopic dermatitis. Regardless of treatment discontinuation or switch to a different treatment for atopic dermatitis, continue following patients for malignancy outcomes and possibly other adverse events with delayed onset. Enroll a sufficient number of patients to describe the frequency of the adverse events of special interest in representative U.S. patients who start treatment with abrocitinib for atopic dermatitis in the setting of routine clinical practice. Implement a plan that uses rigorous, transparent, and verifiable methods to ascertain and characterize safety events that occur during and after treatment with abrocitinib. Enroll patients over a 4-year period and follow each patient for at least 8 years from time of enrollment.

Final Protocol Submission: 4/2023

Study Completion: 10/2033

Final Report Submission: 10/2034

- 4217-4 Conduct or participate in a relevant Pregnancy Exposure Registry, a prospective, registry based observational exposure cohort study that compare the maternal, fetal, and infant outcomes of women exposed to abrocitinib during pregnancy to an unexposed control population. The registry should be designed to detect and record major and minor

congenital malformations, spontaneous abortions, stillbirths, elective terminations, small for gestational age, preterm birth, and any other adverse pregnancy outcomes. These outcomes will be assessed throughout pregnancy. Infant outcomes, including effects on postnatal growth and development, will be assessed through at least the first year of life.

Final Protocol Submission: 12/2022

Study Completion: 12/2027

Final Report Submission: 12/2028

- 4217-5 Conduct an additional pregnancy study that uses a different design from the Pregnancy Exposure Registry (for example a retrospective cohort study using claims or electronic medical record data or a case control study) to assess major congenital malformations, spontaneous abortions, stillbirths, and small for gestational age and preterm birth in women exposed to abrocitinib during pregnancy compared to an unexposed control population.

Final Protocol Submission: 12/2022

Study Completion: 12/2027

Final Report Submission: 06/2028

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>4</sup>

Submit clinical protocol(s) to your IND 123554 with a cross-reference letter to this NDA. Submit nonclinical and chemistry, manufacturing, and controls protocols and all final report(s) to your NDA. Prominently identify the submission with the following wording in bold capital letters at the top of the first page of the submission, as appropriate:

**Required Postmarketing Protocol Under 505(o), Required Postmarketing Final Report Under 505(o), Required Postmarketing Correspondence Under 505(o).**

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.

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<sup>4</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>.

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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.

### **POSTMARKETING COMMITMENT SUBJECT TO REPORTING REQUIREMENTS UNDER SECTION 506B**

We remind you of your postmarketing commitment:

- 4217-6 Conduct a drug-drug interaction trial in healthy subjects using clinical dose of oral abrocitinib and gastric acid reducing agents (e.g., esomeprazole).

The timetable you submitted on January 11, 2022, states that you will conduct this study according to the following schedule:

Final Protocol Submission: complete

Study/Trial Completion: complete

Final Report Submission: 4/2022

A final submitted protocol is one that the FDA has reviewed and commented upon, and you have revised as needed to meet the goal of the study or clinical trial.

Submit clinical protocols to your IND 123554 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 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.*<sup>5</sup>

As required under 21 CFR 314.81(b)(3)(i), you must submit final promotional materials, and the Prescribing Information, at the time of initial dissemination or publication, accompanied by a Form FDA 2253. Form FDA 2253 is available at FDA.gov.<sup>6</sup> Information and Instructions for completing the form can be found at FDA.gov.<sup>7</sup>

## **REPORTING REQUIREMENTS**

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

As required under 21 CFR 314.80, report each adverse drug experience that is both serious and unexpected within 15 days from initial receipt of the information. You are also required to report cases of drug-induced liver injury (DILI) and retinal detachment regardless of whether it was assessed as serious or non-serious within 15 days from initial receipt of the information. Every effort should be made to obtain thorough and complete follow-up of events related to DILI or retinal detachment, including results from specialist consults (e.g., hepatology, ophthalmology). The clinical information collected in this manner will enhance the quality of adverse event reports submitted to the FDA and facilitate our assessment of these reports.

## **POST APPROVAL FEEDBACK MEETING**

New molecular entities qualify for a post approval feedback meeting. Such meetings are used to discuss the quality of the application and to evaluate the communication process during drug development and marketing application review. The purpose is to learn from successful aspects of the review process and to identify areas that could benefit from improvement. If you would like to have such a meeting with us, call the Regulatory Project Manager for this application.

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<sup>5</sup> For the most recent version of a guidance, check the FDA guidance web page at

<https://www.fda.gov/media/128163/download>.

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

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

If you have any questions, call Dawn Williams, Safety Regulatory Project Manager, at (301)796-5376.

Sincerely,

*{See appended electronic signature page}*

Julie Beitz, MD  
Director  
Office of Immunology and Inflammation  
Office of New Drugs  
Center for Drug Evaluation and  
Research

ENCLOSURE(S):

- Content of Labeling
  - Prescribing Information
  - Medication Guide
- Carton and Container Labeling

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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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DAWN WILLIAMS  
01/14/2022 11:28:04 AM

JULIE G BEITZ  
01/14/2022 11:45:42 AM