



BLA 103948/S-5191

SUPPLEMENT APPROVAL

Sanofi-Aventis U.S. LLC
Attention: Mili Khubani, PharmD
Director, Global Regulatory Affairs
55 Corporate Drive
Bridgewater, NJ 08807

Dear Dr. Khubani:

Please refer to your supplemental biologics license application (sBLA), dated and received January 4, 2024, submitted under section 351(a) of the Public Health Service Act for Lemtrada (alemtuzumab) injection.

This Changes Being Effected sBLA provides for proposed modifications to the approved Lemtrada risk evaluation and mitigation strategy (REMS).

We have completed our review of this supplemental application. It is approved, effective on the date of this letter.

RISK EVALUATION AND MITIGATION STRATEGY (REMS) REQUIREMENTS

The REMS for Lemtrada was originally approved on November 11, 2014, and the most recent REMS modification was approved on March 12, 2021. The REMS consists of elements to assure safe use, an implementation system, and a timetable for submission of assessments of the REMS.

Your proposed modifications to the REMS consist of updates to the REMS website to replace static screenshots with links to the most recently approved US Prescribing Information (USPI) and REMS Education Program; updates to the Patient Reminder Letter to reflect that email and phone patient reminder options are removed and patient reminders are only sent by post-mail; and changes to the audit requirement to audit a representative sample of healthcare facilities.

Your proposed modified REMS, submitted on January 4, 2024, amended and appended to this letter, is approved.

The timetable for submission of assessments of the REMS remains the same as that approved on March 12, 2021.

There are no changes to the REMS assessment plan described in our March 12, 2021, letter.

We remind you that in addition to the REMS assessments submitted according to the timetable in the approved REMS, you must include an adequate rationale to support a proposed REMS modification for the addition, modification, or removal of any goal or element of the REMS, as described in section 505-1(g)(4) of the FDCA.

We also remind you that you must submit a REMS assessment when you submit a supplemental application for a new indication for use, as described in section 505-1(g)(2)(A) of the FDCA. This assessment should include:

- a) An evaluation of how the benefit-risk profile will or will not change with the new indication;
- b) A determination of the implications of a change in the benefit-risk profile for the current REMS;
- c) *If the new indication for use introduces unexpected risks:* A description of those risks and an evaluation of whether those risks can be appropriately managed with the currently approved REMS.
- d) *If a REMS assessment was submitted in the 18 months prior to submission of the supplemental application for a new indication for use:* A statement about whether the REMS was meeting its goals at the time of that last assessment and if any modifications of the REMS have been proposed since that assessment.
- e) *If a REMS assessment has not been submitted in the 18 months prior to submission of the supplemental application for a new indication for use:* Provision of as many of the currently listed assessment plan items as is feasible.
- f) *If you propose a REMS modification based on a change in the benefit-risk profile or because of the new indication of use, submit an adequate rationale to support the modification, including:* Provision of the reason(s) why the proposed REMS modification is necessary, the potential effect on the serious risk(s) for which the REMS was required, on patient access to the drug, and/or on the burden on the health care delivery system; and other appropriate evidence or data to support the proposed change. Additionally, include any changes to the assessment plan necessary to assess the proposed modified REMS. *If you are not proposing REMS modifications,* provide a rationale for why the REMS does not need to be modified.

Additionally, we recommend that you submit your proposed audit plan and non-compliance plan for FDA review within 60 days of this letter. Prominently identify the submission containing the assessment instruments and methodology with the following wording in bold capital letters at the top of the first page of the submission: **"REQUEST**

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

FOR REMS ASSESSMENT METHODOLOGY PROTOCOL REVIEW/ AUDIT PLAN AND COMPLIANCE PLAN” in bold capital letters, at the **top** of your cover letter **and** at the **top** of the first page of the main submission document.

If the assessment instruments and methodology for your REMS assessments are not included in the REMS supporting document, or if you propose changes to the submitted assessment instruments or methodology, you should update the REMS supporting document to include specific assessment instrument and methodology information at least 90 days before the assessments will be conducted. Updates to the REMS supporting document may be included in a new document that references previous REMS supporting document submission(s) for unchanged portions. Alternatively, updates may be made by modifying the complete previous REMS supporting document, with all changes marked and highlighted.

Prominently identify the submission containing the assessment instruments and methodology with the following wording in bold capital letters at the top of the first page of the submission:

BLA 103948 REMS ASSESSMENT METHODOLOGY

(insert concise description of content in bold capital letters, e.g.,

ASSESSMENT METHODOLOGY, PROTOCOL, SURVEY METHODOLOGIES, AUDIT PLAN, DRUG USE STUDY)

Prominently identify any submission containing the REMS assessments or proposed modifications of the REMS with the following wording in bold capital letters at the top of the first page of the submission as appropriate:

BLA 103948 REMS ASSESSMENT

or

**NEW SUPPLEMENT FOR BLA 103948/ S-000
CHANGES BEING EFFECTED IN 30 DAYS
PROPOSED MINOR REMS MODIFICATION**

or

**NEW SUPPLEMENT FOR BLA 103948/ S-000
PRIOR APPROVAL SUPPLEMENT
PROPOSED MAJOR REMS MODIFICATION**

or

**NEW SUPPLEMENT FOR BLA 103948/ S-000
PRIOR APPROVAL SUPPLEMENT**

**PROPOSED REMS MODIFICATIONS DUE TO SAFETY LABELING
CHANGES SUBMITTED IN SUPPLEMENT XXX**

or

**NEW SUPPLEMENT (NEW INDICATION FOR USE)
FOR BLA 103948/ S-000
REMS ASSESSMENT
PROPOSED REMS MODIFICATION (if included)**

Should you choose to submit a REMS revision, prominently identify the submission containing the REMS revisions with the following wording in bold capital letters at the top of the first page of the submission:

REMS REVISIONS FOR BLA 103948

To facilitate review of your submission, we request that you submit your proposed modified REMS and other REMS-related materials in Microsoft Word format. If certain documents, such as enrollment forms, or website screenshots are only in PDF format, they may be submitted as such, but Word format is preferred.

SUBMISSION OF REMS DOCUMENT IN SPL FORMAT

As soon as possible, but no later than 14 days from the date of this letter, submit the REMS document in Structured Product Labeling (SPL) format using the FDA automated drug registration and listing system (eLIST). Content of the REMS document must be identical to the approved REMS document. The SPL will be publicly available.

Information on submitting REMS in SPL format may be found in the guidance for industry *Providing Regulatory Submission in Electronic Format – Content of the Risk Evaluation and Mitigation Strategies Document Using Structured Product Labeling*.

For more information on submitting REMS in SPL format, please email

FDAREMSwebsite@fda.hhs.gov.

REPORTING REQUIREMENTS

We remind you that you must comply with reporting requirements for an approved BLA (in 21 CFR 600.80 and in 21 CFR 600.81).

If you have any questions, contact Bethany Shelbourne, Regulatory Project Manager, at bethany.shelbourne@fda.hhs.gov.

Sincerely,

{See appended electronic signature page}

Alice T.D. Hughes, MD
Deputy Director for Safety
Division of Neurology 2
Office of Neuroscience
Center for Drug Evaluation and Research

ENCLOSURE(S):

- REMS

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/

ALICE HUGHES
03/04/2024 11:29:05 AM