CENTER FOR DRUG EVALUATION AND RESEARCH

Approval Package for:

APPLICATION NUMBER:

NDA 21-073/S-020

Trade Name: Actos

Generic Name: pioglitazone HCL

Sponsor: Takeda Pharmaceuticals North America, Inc.

Approval Date: November 26, 2003

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APPLICATION NUMBER:

NDA 21-073/S-020

CONTENTS

Reviews / Information Included in this NDA Review.	
Approval Letter	X
Approvable Letter	
Final Printed Labeling	X
Medical Review(s)	X
Chemistry Review(s)	
EA/FONSI	
Pharmacology Review(s)	
Statistical Review(s)	X
Microbiology Review(s)	
Clinical Pharmacology/ Biopharmaceutics Review(s)	X
Administrative and Correspondence Document(s)	X

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APPLICATION NUMBER:

NDA 21-073/S-020

APPROVAL LETTER

NDA 21-073/S-020

Takeda Pharmaceuticals North America, Inc.
Attention: Mary Jo Pritza, MPH, PharmD.
Regulatory Affairs Manager
475 Half Day Road, Suite 500
Lincolnshire, IL 60069

Dear Ms. Pritza:

Please refer to your supplemental new drug application dated January 24, 2003, received January 27, 2003, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Actos® (pioglitazone HCl) Tablets, 15 mg, 30 mg and 45 mg.

We acknowledge receipt of your submissions dated July 22, August 13, and November 3, and 7, 2003.

This supplement provides for documentation to support multiple labeling changes to the **CLINICAL PHARMACOLOGY** section, (**Clinical Studies** subsection to include revisions of Actos in combination with metformin, a sulfonylurea, or insulin), **WARNINGS, PRECAUTIONS, ADVERSE REACTIONS**, and **DOSAGE and ADMINISTRATION** sections, of the package insert.

We completed our review of this application, as amended. This application is approved, effective on the date of this letter, for use as recommended in the agreed-upon labeling text.

The final printed labeling (FPL) must be identical to the enclosed labeling (text for the package insert submitted on November 26, 2003.

Please submit the FPL electronically according to the guidance for industry titled Providing Regulatory Submissions in Electronic Format – NDA. Alternatively, you may submit 20 paper copies of the FPL as soon as it is available, in no case more than 30 days after it is printed. Please individually mount 15 of the copies on heavy-weight paper or similar material. For administrative purposes, this submission
should be designated "FPL for approved supplement NDA 21-073/S-020." Approval of this submission by FDA is not required before the labeling is used.

If you issue a letter communicating important information about this drug product (i.e., a "Dear Health Care Professional" letter), we request that you submit a copy of the letter to this NDA and a copy to the following address:

MEDWATCH, HFD-410
FDA
5600 Fishers Lane
Rockville, MD 20857

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, please call Ms. Jena Weber, Regulatory Project Manager, at 301-827-6422.

Sincerely,

{See appended electronic signature page}

David G. Orloff, M.D.
Director
Division of Metabolic and Endocrine Drug Products
Office of Drug Evaluation II
Center for Drug Evaluation and Research

Enclosure (package insert labeling – 30 pages)

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

David Orloff
11/26/03 04:07:23 PM

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

NDA 21-073/S-020

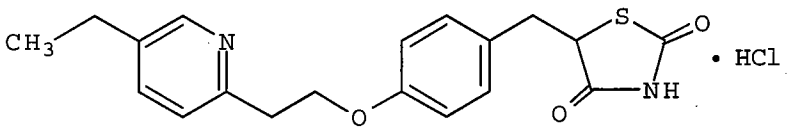
APPROVED LABELING

ACTOS®
(pioglitazone hydrochloride) Tablets

DESCRIPTION

ACTOS (pioglitazone hydrochloride) is an oral antidiabetic agent that acts primarily by decreasing insulin resistance. ACTOS is used in the management of type 2 diabetes mellitus (also known as non-insulin-dependent diabetes mellitus [NIDDM] or adult-onset diabetes). Pharmacological studies indicate that ACTOS improves sensitivity to insulin in muscle and adipose tissue and inhibits hepatic gluconeogenesis. ACTOS improves glycemic control while reducing circulating insulin levels.

Pioglitazone [(±)-5-[[4-[2-(5-ethyl-2-pyridinyl)ethoxy]phenyl]methyl]-2,4-] thiazolidine-dione monohydrochloride belongs to a different chemical class and has a different pharmacological action than the sulfonylureas, metformin, or the α-glucosidase inhibitors. The molecule contains one asymmetric carbon, and the compound is synthesized and used as the racemic mixture. The two enantiomers of pioglitazone interconvert in vivo. No differences were found in the pharmacologic activity between the two enantiomers. The structural formula is as shown:



Pioglitazone hydrochloride is an odorless white crystalline powder that has a molecular formula of $C_{19}H_{20}N_2O_3S$•HCl and a molecular weight of 392.90 daltons. It is soluble in N,N-dimethylformamide, slightly soluble in anhydrous ethanol, very slightly soluble in acetone and acetonitrile, practically insoluble in water, and insoluble in ether.

ACTOS is available as a tablet for oral administration containing 15 mg, 30 mg, or 45 mg of pioglitazone (as the base) formulated with the following excipients: lactose monohydrate NF, hydroxypropylcellulose NF, carboxymethylcellulose calcium NF, and magnesium stearate NF.

CLINICAL PHARMACOLOGY

Mechanism of Action

ACTOS is a thiazolidinedione antidiabetic agent that depends on the presence of insulin for its mechanism of action. ACTOS decreases insulin resistance in the periphery and in the liver resulting in increased insulin-dependent glucose disposal and decreased hepatic glucose output. Unlike sulfonylureas, pioglitazone is not an insulin secretagogue. Pioglitazone is a potent and highly selective agonist for peroxisome proliferator-activated receptor-gamma (PPARγ). PPAR receptors are found in tissues important for insulin action such as adipose tissue, skeletal muscle, and liver. Activation of PPARγ nuclear receptors modulates the transcription of a number of insulin responsive genes involved in the control of glucose and lipid metabolism.

In animal models of diabetes, pioglitazone reduces the hyperglycemia, hyperinsulinemia, and hypertriglyceridemia characteristic of insulin-resistant states such as type 2 diabetes. The metabolic changes produced by pioglitazone result in increased responsiveness of insulin-dependent tissues and are observed in numerous animal models of insulin resistance.

Since pioglitazone enhances the effects of circulating insulin (by decreasing insulin resistance), it does not lower blood glucose in animal models that lack endogenous insulin.

Pharmacokinetics and Drug Metabolism

Serum concentrations of total pioglitazone (pioglitazone plus active metabolites) remain elevated 24 hours after once daily dosing. Steady-state serum concentrations of both pioglitazone and total pioglitazone are achieved within 7 days. At steady-state, two of the pharmacologically active metabolites of pioglitazone, Metabolites III (M-III) and IV (M-IV), reach serum concentrations equal to or greater than pioglitazone. In both healthy volunteers and in patients with type 2 diabetes, pioglitazone comprises approximately 30% to 50% of the peak total pioglitazone serum concentrations and 20% to 25% of the total area under the serum concentration-time curve (AUC).

Maximum serum concentration (C_{max}), AUC, and trough serum concentrations (C_{min}) for both pioglitazone and total pioglitazone increase proportionally at doses of 15 mg and 30 mg per day. There is a slightly less than proportional increase for pioglitazone and total pioglitazone at a dose of 60 mg per day.

Absorption: Following oral administration, in the fasting state, pioglitazone is first measurable in serum within 30 minutes, with peak concentrations observed within 2 hours. Food slightly delays the time to peak serum concentration to 3 to 4 hours, but does not alter the extent of absorption.

Distribution: The mean apparent volume of distribution (Vd/F) of pioglitazone following single-dose administration is 0.63 ± 0.41 (mean ± SD) L/kg of body weight. Pioglitazone is extensively protein bound (> 99%) in human serum, principally to serum albumin. Pioglitazone also binds to other serum proteins, but with lower affinity. Metabolites M-III and M-IV also are extensively bound (> 98%) to serum albumin.

Metabolism: Pioglitazone is extensively metabolized by hydroxylation and oxidation; the metabolites also partly convert to glucuronide or sulfate conjugates. Metabolites M-II and M-IV (hydroxy derivatives of pioglitazone) and M-III (keto derivative of pioglitazone) are pharmacologically active in animal models of type 2 diabetes. In addition to pioglitazone, M-III and M-IV are the principal drug-related species found in human serum following multiple dosing. At steady-state, in both healthy volunteers and in patients with type 2 diabetes, pioglitazone comprises approximately 30% to 50% of the total peak serum concentrations and 20% to 25% of the total AUC.

In vitro data demonstrate that multiple CYP isoforms are involved in the metabolism of pioglitazone. The cytochrome P450 isoforms involved are CYP2C8 and, to a lesser degree, CYP3A4 with additional contributions from a variety of other isoforms including the mainly extrahepatic CYP1A1. In vivo studies of pioglitazone in combination with P450 inhibitors and substrates have been performed (see Drug Interactions). Urinary 6ß-hydroxycortisol/cortisol ratios measured in patients treated with ACTOS showed that pioglitazone is not a strong CYP3A4 enzyme inducer.

Excretion and Elimination: Following oral administration, approximately 15% to 30% of the pioglitazone dose is recovered in the urine. Renal elimination of pioglitazone is negligible, and the drug is excreted primarily as metabolites and their conjugates. It is presumed that most of the oral dose is excreted into the bile either unchanged or as metabolites and eliminated in the feces.

The mean serum half-life of pioglitazone and total pioglitazone ranges from 3 to 7 hours and 16 to 24 hours, respectively. Pioglitazone has an apparent clearance, CL/F, calculated to be 5 to 7 L/hr.

Special Populations

Renal Insufficiency: The serum elimination half-life of pioglitazone, M-III, and M-IV remains unchanged in patients with moderate (creatinine clearance 30 to 60 mL/min) to severe (creatinine clearance < 30 mL/min) renal impairment when compared to normal subjects. No dose adjustment in patients with renal dysfunction is recommended (see DOSAGE AND ADMINISTRATION).

Hepatic Insufficiency: Compared with normal controls, subjects with impaired hepatic function (Child-Pugh Grade B/C) have an approximate 45% reduction in pioglitazone and total pioglitazone mean peak concentrations but no change in the mean AUC values.

ACTOS therapy should not be initiated if the patient exhibits clinical evidence of active liver disease or serum transaminase levels (ALT) exceed 2.5 times the upper limit of normal (see PRECAUTIONS, Hepatic Effects).

Elderly: In healthy elderly subjects, peak serum concentrations of pioglitazone and total pioglitazone are not significantly different, but AUC values are slightly higher and the terminal half-life values slightly longer than for younger subjects. These changes were not of a magnitude that would be considered clinically relevant.

Pediatrics: Pharmacokinetic data in the pediatric population are not available.

Gender: The mean C_{max} and AUC values were increased 20% to 60% in females. As monotherapy and in combination with sulfonylurea, metformin, or insulin, ACTOS improved glycemic control in both males and females. In controlled clinical trials, hemoglobin A_{1c} (HbA_{1c}) decreases from baseline were generally greater for females than for males (average mean difference in HbA_{1c} 0.5%). Since therapy should be individualized for each patient to achieve glycemic control, no dose adjustment is recommended based on gender alone.

Ethnicity: Pharmacokinetic data among various ethnic groups are not available.

Drug-Drug Interactions

The following drugs were studied in healthy volunteers with a co-administration of ACTOS 45 mg once daily. Listed below are the results:

Oral Contraceptives: Co-administration of ACTOS (45 mg once daily) and an oral contraceptive (1 mg norethindrone plus 0.035 mg ethinyl estradiol once daily) for 21 days, resulted in 11% and 11-14% decrease in ethinyl estradiol AUC (0-24h) and C_{max} respectively. There were no significant changes in norethindrone AUC (0-24h) and C_{max}. In view of the high variability of ethinyl estradiol pharmacokinetics, the clinical significance of this finding is unknown.

Fexofenadine HCl: Co-administration of ACTOS for 7 days with 60 mg fexofenadine administered orally twice daily resulted in no significant effect on pioglitazone pharmacokinetics. ACTOS had no significant effect on fexofenadine pharmacokinetics.

Glipizide: Co-administration of ACTOS and 5 mg glipizide administered orally once daily for 7 days did not alter the steady-state pharmacokinetics of glipizide.

Digoxin: Co-administration of ACTOS with 0.25 mg digoxin administered orally once daily for 7 days did not alter the steady-state pharmacokinetics of digoxin.

Warfarin: Co-administration of ACTOS for 7 days with warfarin did not alter the steady-state pharmacokinetics of warfarin. ACTOS has no clinically significant effect on prothrombin time when administered to patients receiving chronic warfarin therapy.

Metformin: Co-administration of a single dose of metformin (1000 mg) and ACTOS after 7 days of ACTOS did not alter the pharmacokinetics of the single dose of metformin.

Midazolam: Administration of ACTOS for 15 days followed by a single 7.5 mg dose of midazolam syrup resulted in a 26% reduction in midazolam C_{max} and AUC.

Ranitidine HCl: Co-administration of ACTOS for 7 days with ranitidine administered orally twice daily for either 4 or 7 days resulted in no significant effect on pioglitazone pharmacokinetics. ACTOS showed no significant effect on ranitidine pharmacokinetics.

Nifedipine ER: Co-administration of ACTOS for 7 days with 30 mg nifedipine ER administered orally once daily for 4 days to male and female volunteers resulted in least square mean (90% CI) values for unchanged nifedipine of 0.83 (0.73 - 0.95) for C_{max} and 0.88 (0.80 - 0.96) for AUC. In view of the high variability of nifedipine pharmacokinetics, the clinical significance of this finding is unknown.

Ketoconazole: Co-administration of ACTOS for 7 days with ketoconazole 200 mg administered twice daily resulted in least square mean (90% CI) values for unchanged pioglitazone of 1.14 (1.06 - 1.23) for C_{max}, 1.34 (1.26 - 1.41) for AUC and 1.87 (1.71 - 2.04) for C_{min}.

Atorvastatin Calcium: Co-administration of ACTOS for 7 days with atorvastatin calcium (LIPITOR®) 80 mg once daily resulted in least square mean (90% CI) values for unchanged pioglitazone of 0.69 (0.57 - 0.85) for C_{max}, 0.76 (0.65 - 0.88) for AUC and 0.96 (0.87 - 1.05) for C_{min}. For unchanged atorvastatin the least square mean (90% CI) values were 0.77 (0.66 - 0.90) for C_{max}, 0.86 (0.78 - 0.94) for AUC and 0.92 (0.82 - 1.02) for C_{min}.

Theophylline: Co-administration of ACTOS for 7 days with theophylline 400 mg administered twice daily resulted in no change in the pharmacokinetics of either drug.

Cytochrome P450: See **PRECAUTIONS**

Pharmacodynamics and Clinical Effects

Clinical studies demonstrate that ACTOS improves insulin sensitivity in insulin-resistant patients. ACTOS enhances cellular responsiveness to insulin, increases insulin-dependent glucose disposal, improves hepatic sensitivity to insulin, and improves dysfunctional glucose homeostasis. In patients with type 2 diabetes, the decreased insulin resistance produced by ACTOS results in lower plasma glucose concentrations, lower plasma insulin levels, and lower HbA_{1c} values. Based on results from an open-label extension study, the glucose lowering effects of ACTOS appear to persist for at least one year. In controlled clinical trials, ACTOS in combination with sulfonylurea, metformin, or insulin had an additive effect on glycemic control.

Patients with lipid abnormalities were included in clinical trials with ACTOS. Overall, patients treated with ACTOS had mean decreases in triglycerides, mean increases in HDL cholesterol, and no consistent mean changes in LDL and total cholesterol.

In a 26-week, placebo-controlled, dose-ranging study, mean triglyceride levels decreased in the 15 mg, 30 mg, and 45 mg ACTOS dose groups compared to a mean increase in the placebo group. Mean HDL levels increased to a greater extent in patients treated with ACTOS than in the placebo-treated patients. There were no consistent differences for LDL and total cholesterol in patients treated with ACTOS compared to placebo (Table 1).

Table 1 Lipids in a 26-Week Placebo-Controlled Monotherapy Dose-Ranging Study

	Placebo	ACTOS 15 mg Once Daily	ACTOS 30 mg Once Daily	ACTOS 45 mg Once Daily
Triglycerides (mg/dL)	N=79	N=79	N=84	N=77
Baseline (mean)	262.8	283.8	261.1	259.7
Percent change from baseline (mean)	4.8%	-9.0%	-9.6%	-9.3%
HDL Cholesterol (mg/dL)	N=79	N=79	N=83	N=77
Baseline (mean)	41.7	40.4	40.8	40.7
Percent change from baseline (mean)	8.1%	14.1%	12.2%	19.1%
LDL Cholesterol (mg/dL)	N=65	N=63	N=74	N=62
Baseline (mean)	138.8	131.9	135.6	126.8
Percent change from baseline (mean)	4.8%	7.2%	5.2%	6.0%
Total Cholesterol (mg/dL)	N=79	N=79	N=84	N=77
Baseline (mean)	224.6	220.0	222.7	213.7
Percent change from baseline (mean)	4.4%	4.6%	3.3%	6.4%

In the two other monotherapy studies (24 weeks and 16 weeks) and in combination therapy studies with sulfonylurea (24 weeks and 16 weeks) and metformin (24 weeks and 16 weeks), the results were generally consistent with the data above. In placebo-controlled trials, the placebo-corrected mean changes from baseline decreased 5% to 26% for triglycerides and increased 6% to 13% for HDL in patients treated with ACTOS. A similar pattern of results was seen in 24-week combination therapy studies of ACTOS with sulfonylurea or metformin.

In a combination therapy study with insulin (16 weeks), the placebo-corrected mean percent change from baseline in triglyceride values for patients treated with ACTOS was also decreased. A placebo-corrected mean change from baseline in LDL cholesterol of

7% was observed for the 15 mg dose group. Similar results to those noted above for HDL and total cholesterol were observed. A similar pattern of results was seen in a 24-week combination therapy study with ACTOS with insulin.

Clinical Studies

Monotherapy

In the U.S., three randomized, double-blind, placebo-controlled trials with durations from 16 to 26 weeks were conducted to evaluate the use of ACTOS as monotherapy in patients with type 2 diabetes. These studies examined ACTOS at doses up to 45 mg or placebo once daily in 865 patients.

In a 26-week dose-ranging study, 408 patients with type 2 diabetes were randomized to receive 7.5 mg, 15 mg, 30 mg, or 45 mg of ACTOS, or placebo once daily. Therapy with any previous antidiabetic agent was discontinued 8 weeks prior to the double-blind period. Treatment with 15 mg, 30 mg, and 45 mg of ACTOS produced statistically significant improvements in HbA_{1c} and fasting plasma glucose (FPG) at endpoint compared to placebo (see Figure 1, Table 2).

Figure 1 shows the time course for changes in FPG and HbA_{1c} for the entire study population in this 26-week study.

FIGURE 1 MEAN CHANGE FROM BASELINE FOR FPG AND HBA_{1c} IN A 26-WEEK PLACEBO-CONTROLLED DOSE-RANGING STUDY

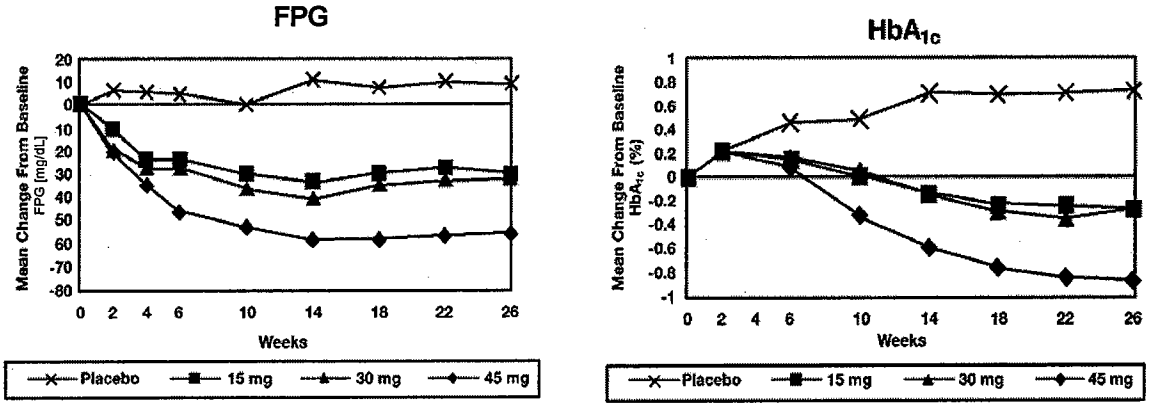


TABLE 2 SHOWS HbA_{1c} AND FPG VALUES FOR THE ENTIRE STUDY POPULATION.

Table 2 Glycemic Parameters in a 26-Week Placebo-Controlled Dose-Ranging Study

	Placebo	ACTOS 15 mg Once Daily	ACTOS 30 mg Once Daily	ACTOS 45 mg Once Daily
Total Population				
HbA_{1c} (%)	N=79	N=79	N=85	N=76
Baseline (mean)	10.4	10.2	10.2	10.3
Change from baseline (adjusted mean[+])	0.7	-0.3	-0.3	-0.9
Difference from placebo (adjusted mean[+])		-1.0*	-1.0*	-1.6*
FPG (mg/dL)	N=79	N=79	N=84	N=77
Baseline (mean)	268	267	269	276
Change from baseline (adjusted mean[+])	9	-30	-32	-56
Difference from placebo (adjusted mean[+])		-39*	-41*	-65*

[+] Adjusted for baseline, pooled center, and pooled center by treatment interaction

* $p \leq 0.050$ vs. placebo

THE STUDY POPULATION INCLUDED PATIENTS NOT PREVIOUSLY TREATED WITH ANTIDIABETIC MEDICATION (NAÏVE; 31%) AND PATIENTS WHO WERE RECEIVING ANTIDIABETIC MEDICATION AT THE TIME OF STUDY ENROLLMENT (PREVIOUSLY TREATED; 69%). THE DATA FOR THE NAÏVE AND PREVIOUSLY TREATED PATIENT SUBSETS ARE SHOWN IN TABLE 3. ALL PATIENTS ENTERED AN 8 WEEK WASHOUT/RUN-IN PERIOD PRIOR TO DOUBLE-BLIND TREATMENT. THIS RUN-IN PERIOD WAS ASSOCIATED WITH LITTLE CHANGE IN HbA_{1c} AND FPG VALUES FROM SCREENING TO BASELINE FOR THE NAÏVE PATIENTS; HOWEVER, FOR THE PREVIOUSLY-TREATED GROUP, WASHOUT FROM PREVIOUS ANTIDIABETIC MEDICATION RESULTED IN DETERIORATION OF GLYCEMIC CONTROL AND INCREASES IN HbA_{1c} AND FPG. ALTHOUGH MOST PATIENTS IN THE PREVIOUSLY-TREATED GROUP HAD A DECREASE FROM BASELINE IN HbA_{1c} AND FPG WITH ACTOS, IN MANY CASES THE VALUES DID NOT RETURN TO SCREENING LEVELS BY THE END OF THE STUDY. THE STUDY DESIGN DID NOT PERMIT THE EVALUATION OF PATIENTS WHO SWITCHED DIRECTLY TO ACTOS FROM ANOTHER ANTIDIABETIC AGENT.

Table 3 **Glycemic Parameters in a 26-Week Placebo-Controlled Dose-Ranging Study**

	Placebo	ACTOS 15 mg Once Daily	ACTOS 30 mg Once Daily	ACTOS 45 mg Once Daily
Naïve to Therapy				
HbA_{1c} (%)	N=25	N=26	N=26	N=21
Screening (mean)	9.3	10.0	9.5	9.8
Baseline (mean)	9.0	9.9	9.3	10.0
Change from baseline (adjusted mean*)	0.6	-0.8	-0.6	-1.9
Difference from placebo (adjusted mean*)		-1.4	-1.3	-2.6
FPG (mg/dL)	N=25	N=26	N=26	N=21
Screening (mean)	223	245	239	239
Baseline (mean)	229	251	225	235
Change from baseline (adjusted mean*)	16	-37	-41	-64
Difference from placebo (adjusted mean*)		-52	-56	-80
Previously Treated				
HbA_{1c} (%)	N=54	N=53	N=59	N=55
Screening (mean)	9.3	9.0	9.1	9.0
Baseline (mean)	10.9	10.4	10.4	10.6
Change from baseline (adjusted mean*)	0.8	-0.1	-0.0	-0.6
Difference from placebo (adjusted mean*)		-1.0	-0.9	-1.4
FPG (mg/dL)	N=54	N=53	N=58	N=56
Screening (mean)	222	209	230	215
Baseline (mean)	285	275	286	292
Change from baseline (adjusted mean*)	4	-32	-27	-55
Difference from placebo (adjusted mean*)		-36	-31	-59

* Adjusted for baseline and pooled center

In a 24-week placebo-controlled study, 260 patients with type 2 diabetes were randomized to one of two forced-titration ACTOS treatment groups or a mock titration placebo group. Therapy with any previous antidiabetic agent was discontinued 6 weeks prior to the double-blind period. In one ACTOS treatment group, patients received an initial dose of 7.5 mg once daily. After four weeks, the dose was increased to 15 mg once daily and after another four weeks, the dose was increased to 30 mg once daily for the remainder of the study (16 weeks). In the second ACTOS treatment group, patients received an initial dose of 15 mg once daily and were titrated to 30 mg once daily and 45 mg once daily in a similar manner. Treatment with ACTOS, as described, produced statistically significant improvements in HbA_{1c} and FPG at endpoint compared to placebo (see Table 4).

Table 4 Glycemic Parameters in a 24-Week Placebo-Controlled Forced-Titration Study

	Placebo	ACTOS 30 mg[+] Once Daily	ACTOS 45 mg[+] Once Daily
Total Population			
HbA_{1c} (%)	N=83	N=85	N=85
Baseline (mean)	10.8	10.3	10.8
Change from baseline (adjusted mean[++])	0.9	-0.6	-0.6
Difference from placebo (adjusted mean[++])		-1.5*	-1.5*
FPG (mg/dL)	N=78	N=82	N=85
Baseline (mean)	279	268	281
Change from baseline (adjusted mean[++])	18	-44	-50
Difference from placebo (adjusted mean[++])		-62*	-68*

[+] Final dose in forced titration

[++] Adjusted for baseline, pooled center, and pooled center by treatment interaction

* $p \leq 0.050$ vs. placebo

For patients who had not been previously treated with antidiabetic medication (24%), mean values at screening were 10.1% for HbA_{1c} and 238 mg/dL for FPG. At baseline, mean HbA_{1c} was 10.2% and mean FPG was 243 mg/dL. Compared with placebo, treatment with ACTOS titrated to a final dose of 30 mg and 45 mg resulted in reductions from baseline in mean HbA_{1c} of 2.3% and 2.6% and mean FPG of 63 mg/dL and 95 mg/dL, respectively. For patients who had been previously treated with antidiabetic medication (76%), this medication was discontinued at screening. Mean values at screening were 9.4% for HbA_{1c} and 216 mg/dL for FPG. At baseline, mean HbA_{1c} was 10.7% and mean FPG was 290 mg/dL. Compared with placebo, treatment with ACTOS titrated to a final dose of 30 mg and 45 mg resulted in reductions from baseline in mean HbA_{1c} of 1.3% and 1.4% and mean FPG of 55 mg/dL and 60 mg/dL, respectively. For many previously-treated patients, HbA_{1c} and FPG had not returned to screening levels by the end of the study.

In a 16-week study, 197 patients with type 2 diabetes were randomized to treatment with 30 mg of ACTOS or placebo once daily. Therapy with any previous antidiabetic agent was discontinued 6 weeks prior to the double-blind period. Treatment with 30 mg of ACTOS produced statistically significant improvements in HbA_{1c} and FPG at endpoint compared to placebo (see Table 5).

Table 5 Glycemic Parameters in a 16-Week Placebo-Controlled Study

	Placebo	ACTOS 30 mg Once Daily
Total Population		
HbA_{1c} (%)	N=93	N=100
Baseline (mean)	10.3	10.5
Change from baseline (adjusted mean[+])	0.8	-0.6
Difference from placebo (adjusted mean[+])		-1.4*
FPG (mg/dL)	N=91	N=99
Baseline (mean)	270	273
Change from baseline (adjusted mean[+])	8	-50
Difference from placebo (adjusted mean[+])		-58*

[+] Adjusted for baseline, pooled center, and pooled center by treatment interaction

* $p \leq 0.050$ vs. placebo

For patients who had not been previously treated with antidiabetic medication (40%), mean values at screening were 10.3% for HbA_{1c} and 240 mg/dL for FPG. At baseline, mean HbA_{1c} was 10.4% and mean FPG was 254 mg/dL. Compared with placebo, treatment with ACTOS 30 mg resulted in reductions from baseline in mean HbA_{1c} of 1.0% and mean FPG of 62 mg/dL. For patients who had been previously treated with antidiabetic medication (60%), this medication was discontinued at screening. Mean values at screening were 9.4% for HbA_{1c} and 216 mg/dL for FPG. At baseline, mean HbA_{1c} was 10.6% and mean FPG was 287 mg/dL. Compared with placebo, treatment with ACTOS 30 mg resulted in reductions from baseline in mean HbA_{1c} of 1.3% and mean FPG of 46 mg/dL. For many previously-treated patients, HbA_{1c} and FPG had not returned to screening levels by the end of the study.

Combination Therapy

Three 16-week, randomized, double-blind, placebo-controlled clinical studies and three 24-week randomized, double-blind, dose-controlled clinical studies were conducted to evaluate the effects of ACTOS on glycemic control in patients with type 2 diabetes who were inadequately controlled ($HbA_{1c} \geq 8\%$) despite current therapy with a sulfonylurea, metformin, or insulin. Previous diabetes treatment may have been monotherapy or combination therapy.

ACTOS Plus Sulfonylurea Studies

Two clinical studies were conducted with ACTOS in combination with a sulfonylurea. Both studies included patients with type 2 diabetes on a sulfonylurea, either alone or in combination with another antidiabetic agent. All other antidiabetic agents were withdrawn prior to starting study treatment. In the first study, 560 patients were randomized to receive 15 mg or 30 mg of ACTOS or placebo once daily for 16 weeks in addition to their current sulfonylurea regimen. When compared to placebo at Week 16, the addition of ACTOS to the sulfonylurea significantly reduced the mean HbA_{1c} by 0.9% and 1.3% and mean FPG by 39 mg/dL and 58 mg/dL for the 15 mg and 30 mg doses, respectively.

In the second study, 702 patients were randomized to receive 30 mg or 45 mg of ACTOS once daily for 24 weeks in addition to their current sulfonylurea regimen. The mean reductions from baseline at Week 24 in HbA_{1C} were 1.55% and 1.67% for the 30 mg and 45 mg doses, respectively. Mean reductions from baseline in FPG were 51.5 mg/dL and 56.1 mg/dL.

The therapeutic effect of ACTOS in combination with sulfonylurea was observed in patients regardless of whether the patients were receiving low, medium, or high doses of sulfonylurea.

ACTOS Plus Metformin Studies

Two clinical studies were conducted with ACTOS in combination with metformin. Both studies included patients with type 2 diabetes on metformin, either alone or in combination with another diabetic agent. All other antidiabetic agents were withdrawn prior to starting study treatment. In the first study, 328 patients were randomized to receive either 30 mg of ACTOS or placebo once daily for 16 weeks in addition to their current metformin regimen. When compared to placebo at Week 16, the addition of ACTOS to metformin significantly reduced the mean HbA_{1c} by 0.8% and decreased the mean FPG by 38 mg/dL.

In the second study, 827 patients were randomized to receive either 30 mg or 45 mg of ACTOS once daily for 24 weeks in addition to their current metformin regimen. The mean reductions from baseline at Week 24 in HbA_{1c} were 0.80% and 1.01% for the 30 mg and 45 mg doses, respectively. Mean reductions from baseline in FPG were 38.2 mg/dL and 50.7 mg/dL.

The therapeutic effect of ACTOS in combination with metformin was observed in patients regardless of whether the patients were receiving lower or higher doses of metformin.

ACTOS Plus Insulin Studies

Two clinical studies were conducted with ACTOS in combination with insulin. Both studies included patients with type 2 diabetes on insulin, either alone or in combination with another antidiabetic agent. All other antidiabetic agents were withdrawn prior to starting study treatment. In the first study, 566 patients receiving a median of 60.5 units per day of insulin were randomized to receive either 15 mg or 30 mg of ACTOS or placebo once daily for 16 weeks in addition to their insulin regimen. When compared to placebo at Week 16, the addition of ACTOS to insulin significantly reduced both HbA_{1c} by 0.7% and 1.0% and FPG by 35 mg/dl and 49 mg/dL for the 15 mg and 30 mg dose, respectively.

In the second study, 690 patients receiving a median of 60.0 units per day of insulin received either 30 mg or 45 mg of ACTOS once daily for 24 weeks in addition to their current insulin regimen. The mean reductions from baseline at Week 24 in HbA_{1c} were 1.17% and 1.46% for the 30 mg and 45 mg doses, respectively. Mean reductions from baseline in FPG were 31.9 mg/dL and 45.8 mg/dL. Improved glycemic control was accompanied by mean decreases from baseline in insulin dose requirements of 6.0% and 9.4% per day for the 30 mg and 45 mg dose, respectively. Improved glycemic control was accompanied by mean decreases from baseline in insulin dose requirements of 6.0% and 9.4% per day for the 30 mg and 45 mg dose, respectively.

The therapeutic effect of ACTOS in combination with insulin was observed in patients regardless of whether the patients were receiving lower or higher doses of insulin.

INDICATIONS AND USAGE

ACTOS is indicated as an adjunct to diet and exercise to improve glycemic control in patients with type 2 diabetes (non-insulin-dependent diabetes mellitus, NIDDM). ACTOS is indicated for monotherapy. ACTOS is also indicated for use in combination with a sulfonylurea, metformin, or insulin when diet and exercise plus the single agent does not result in adequate glycemic control.

Management of type 2 diabetes should also include nutritional counseling, weight reduction as needed, and exercise. These efforts are important not only in the primary treatment of type 2 diabetes, but also to maintain the efficacy of drug therapy.

CONTRAINDICATIONS

ACTOS is contraindicated in patients with known hypersensitivity to this product or any of its components.

WARNINGS

Cardiac Failure and Other Cardiac Effects

ACTOS, like other thiazolidinediones, can cause fluid retention when used alone or in combination with other antidiabetic agents, including insulin. Fluid retention may lead to or exacerbate heart failure. Patients should be observed for signs and symptoms of heart failure (see Information for Patients). ACTOS should be discontinued if any deterioration in cardiac status occurs. Patients with New York Heart Association (NYHA) Class III and IV cardiac status were not studied during these clinical trials; ACTOS is not recommended in these patients (see PRECAUTIONS, Cardiovascular).

In one 16-week U.S. double-blind, placebo-controlled clinical trial involving 566 patients with type 2 diabetes, ACTOS at doses of 15 mg and 30 mg in combination with insulin was compared to insulin therapy alone. This trial included patients with long-standing diabetes and a high prevalence of pre-existing medical conditions as follows: arterial hypertension (57.2%), peripheral neuropathy (22.6%), coronary heart disease (19.6%), retinopathy (13.1%), myocardial infarction (8.8%), vascular disease (6.4%), angina pectoris (4.4%), stroke and/or transient ischemic attack (4.1%), and congestive heart failure (2.3%).

In this study two of the 191 patients receiving 15 mg ACTOS plus insulin (1.1%) and two of the 188 patients receiving 30 mg ACTOS plus insulin (1.1%) developed congestive heart failure compared with none of the 187 patients on insulin therapy alone. All four of these patients had previous histories of cardiovascular conditions including coronary artery disease, previous CABG procedures, and myocardial infarction. In a 24-week dose-controlled study in which ACTOS was co-administered with insulin, 0.3% of patients (1/345) on 30 mg and 0.9% (3/345) of patients on 45 mg reported CHF as a serious adverse event.

Analysis of data from these studies did not identify specific factors that predict increased risk of congestive heart failure on combination therapy with insulin.

PRECAUTIONS

General

ACTOS exerts its antihyperglycemic effect only in the presence of insulin. Therefore, ACTOS should not be used in patients with type 1 diabetes or for the treatment of diabetic ketoacidosis.

Hypoglycemia: Patients receiving ACTOS in combination with insulin or oral hypoglycemic agents may be at risk for hypoglycemia, and a reduction in the dose of the concomitant agent may be necessary.

Cardiovascular: In U.S. placebo-controlled clinical trials that excluded patients with New York Heart Association (NYHA) Class III and IV cardiac status, the incidence of serious cardiac adverse events related to volume expansion was not increased in patients treated with ACTOS as monotherapy or in combination with sulfonylureas or metformin vs. placebo-treated patients. In insulin combination studies, a small number of patients with a history of previously existing cardiac disease developed congestive heart failure when treated with ACTOS in combination with insulin (see WARNINGS). Patients with NYHA Class III and IV cardiac status were not studied in these ACTOS clinical trials. ACTOS is not indicated in patients with NYHA Class III or IV cardiac status.

In postmarketing experience with ACTOS, cases of congestive heart failure have been reported in patients both with and without previously known heart disease.

Edema: ACTOS should be used with caution in patients with edema. In all U.S. clinical trials, edema was reported more frequently in patients treated with ACTOS than in placebo-treated patients and appears to be dose related (see ADVERSE REACTIONS). In postmarketing experience, reports of initiation or worsening of edema have been received.

Weight Gain: Dose related weight gain was seen with ACTOS alone and in combination with other hypoglycemic agents (Table 6). The mechanism of weight gain is unclear but probably involves a combination of fluid retention and fat accumulation.

Table 6 Weight Changes (kg) from Baseline during Double-Blind Clinical Trials with ACTOS

		Control Group (Placebo)	ACTOS 15 mg	ACTOS 30 mg	ACTOS 45 mg
		Median (25^{th} / 75^{th} percentile)	Median (25^{th} / 75^{th} percentile)	Median (25^{th} / 75^{th} percentile)	Median (25^{th} / 75^{th} percentile)
Monotherapy		-1.4 (-2.7/0.0) n=256	0.9 (-0.5/3.4) n=79	1.0 (-0.9/3.4) n=188	2.6 (0.2/5.4) n=79
Combination Therapy	Sulfonylurea	-0.5 (-1.8/0.7) n=187	2.0 (0.2/3.2) n=183	3.1 (1.1/5.4) n=528	4.1 (1.8/7.3) N=333
	Metformin	-1.4 (-3.2/0.3) n=160	N/A	0.9 (-.3/3.2) n=567	1.8 (-0.9/5.0) N=407
	Insulin	0.2 (-1.4/1.4) n=182	2.3 (0.5/4.3) n=190	3.3 (0.9/6.3) n=522	4.1 (1.4/6.8) N=338

Note: Trial durations of 16 to 26 weeks

Ovulation: Therapy with ACTOS, like other thiazolidinediones, may result in ovulation in some premenopausal anovulatory women. As a result, these patients may be at an

increased risk for pregnancy while taking ACTOS. Thus, adequate contraception in premenopausal women should be recommended. This possible effect has not been investigated in clinical studies so the frequency of this occurrence is not known.

Hematologic: ACTOS may cause decreases in hemoglobin and hematocrit. Across all clinical studies, mean hemoglobin values declined by 2% to 4% in patients treated with ACTOS. These changes primarily occurred within the first 4 to 12 weeks of therapy and remained relatively constant thereafter. These changes may be related to increased plasma volume and have rarely been associated with any significant hematologic clinical effects (see ADVERSE REACTIONS, Laboratory Abnormalities).

Hepatic Effects:
In pre-approval clinical studies worldwide, over 4500 subjects were treated with ACTOS. In U.S. clinical studies, over 4700 patients with type 2 diabetes received ACTOS. There was no evidence of drug-induced hepatotoxicity or elevation of ALT levels in the clinical studies.

During pre-approval placebo-controlled clinical trials in the U.S., a total of 4 of 1526 (0.26%) patients treated with ACTOS and 2 of 793 (0.25%) placebo-treated patients had ALT values ≥ 3 times the upper limit of normal. The ALT elevations in patients treated with ACTOS were reversible and were not clearly related to therapy with ACTOS.
In postmarketing experience with ACTOS, reports of hepatitis and of hepatic enzyme elevations to 3 or more times the upper limit of normal have been received. Very rarely, these reports have involved hepatic failure with and without fatal outcome, although causality has not been established.

Pioglitazone is structurally related to troglitazone, a thiazolidinedione no longer marketed in the United States, which was associated with idiosyncratic hepatotoxicity and cases of liver failure, liver transplants and death during postmarketing clinical use. In pre-approval controlled clinical trials in patients with type 2 diabetes, troglitazone was more frequently associated with clinically significant elevations of hepatic enzymes (ALT > 3 times the upper limit of normal) compared to placebo, and cases of reversible jaundice were reported.

Pending the availability of the results of additional large, long-term controlled clinical trials and additional postmarketing safety data, it is recommended that patients treated with ACTOS undergo periodic monitoring of liver enzymes

Serum ALT (alanine aminotransferase) levels should be evaluated prior to the initiation of therapy with ACTOS in all patients and periodically thereafter per the clinical judgment of the health care professional. Liver function tests should also be obtained for patients if symptoms suggestive of hepatic dysfunction occur, e.g., nausea, vomiting, abdominal pain, fatigue, anorexia, dark urine. The decision whether to continue the patient on therapy with ACTOS should be guided by clinical judgment pending laboratory evaluations. If jaundice is observed, drug therapy should be discontinued.

Therapy with ACTOS should not be initiated if the patient exhibits clinical evidence of active liver disease or the ALT levels exceed 2.5 times the upper limit of normal. Patients with mildly elevated liver enzymes (ALT levels at 1 to 2.5 times the upper limit of normal) at baseline or any time during therapy with ACTOS should be evaluated to determine the cause of the liver enzyme elevation. Initiation or continuation of therapy with ACTOS in patients with mildly elevated liver enzymes should proceed with caution and include appropriate clinical follow-up, which may include more frequent liver enzyme monitoring. If serum transaminase levels are