CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

21-644

ADMINISTRATIVE and CORRESPONDENCE DOCUMENTS

PATENT AND EXCLUSIVITY INFORMATION (ITEM 13)

1. **Active Ingredient:** Clobetasol propionate (USAN)

2. **Strength:** 0.05% (0.5 mg/g)

3. **Trade Name:** CLOBEX™ Shampoo, 0.05%

4. **Dosage Form and Route of Administration:** Shampoo, Topical application to the scalp

5. **Applicant Firm Name:** GALDERMA Laboratories, L.P.

   The applicant, GALDERMA Laboratories, L.P., is a coorporate entity doing business in the United States at 14501 North Freeway, Fort Worth, Texas 76177.

6.

Applicant Patent	Expiration Date	Patent Holder
US Serial N° 09/709,477*	June 17, 2019	Galderma R&D, S.N.C. 635, route des Lucioles BP 87 06902 Sophia Antipolis Cedex FRANCE

* Not yet granted

U.S. Agent for the Patent Holder

Nixon & Vanderhye P.C.
1100 North Glebe Road ,
8th Floor, Arlington,
Virginia 22201-4714
USA

7. **Brief Description of Each Patent which Claims the Drug**

Patent No.

US Serial N°
09/709,477 claims a stable, foaming composition for washing and treating hair and/or scalp essentially characterised in that it contains in an aqueous medium: at least an active principle selected among corticoids and retinoids; at least an anionic surfactant, at least an amphoteric surfactant and a pro-penetrating agent.

8. **Claimed Exclusivity (21 CFR 314.50 (j))**

1. The applicant, GALDERMA Laboratories, L.P., claims 3 years marketing exclusivity upon approval of the drug product that is the subject of this New Drug Application submitted pursuant to section 505(b) of the FD&C Act.

2. The applicant makes reference to 21 CFR 314.108 (b)(4) in support of this claim.

Claimed Exclusivity - 21 CFR 314.50 (j)

i. *New clinical investigation*: The applicant certifies that to the best of its knowledge the Phase III safety and efficacy clinical investigation included in the application meets the definition of "new clinical investigation" set forth in 314.108 (a).

ii. *Essential to approval*: The applicant certifies that it has thoroughly searched in the scientific literature and, to the best of the applicant's knowledge, there are no known publications wherin a shampoo dosage form of Clobetasol propionate in any strength has been studied for the relief of the inflammatory and pruritic manifestations of

moderate to severe forms of scalp psoriasis. Furthermore, there are no published studies or publicly available reports to provide sufficient basis for the approval of the conditions for which the applicant is seeking approval without reference to the new clinical investigation in this application submitted pursuant to section 505 (b)(2) of the FD&C Act.

iii. *Conducted or sponsored by*: The applicant certifies that it was the sponsor named in the Form FDA 1571 for Investigational New Drug Application (IND) 60,934 under which the new clinical investigation that is essential to the approval of this application was conducted.

May 2, 2003
Date

Bobbi Woodward
Signature

Bobbi WOODWARD
Manager
Regulatory Affairs
GALDERMA Laboratories, L.P.

APPEARS THIS WAY
ON ORIGINAL

EXCLUSIVITY SUMMARY for NDA # 21-644 SUPPL # N/A

Trade Name: Clobex Shampoo, 0.05% Generic Name: Clobetasol Propionate

Applicant Name: Galderma Laboratories, LP HFD- 540

Approval Date: February 5, 2004

PART I: IS AN EXCLUSIVITY DETERMINATION NEEDED?

1. An exclusivity determination will be made for all original applications, but only for certain supplements. Complete Parts II and III of this Exclusivity Summary only if you answer "YES" to one or more of the following questions about the submission.

   a) Is it an original NDA? YES/_X_/ NO /___/

   b) Is it an effectiveness supplement? YES /___/ NO /_X_/

      If yes, what type(SE1, SE2, etc.)?

   c) Did it require the review of clinical data other than to support a safety claim or change in labeling related to safety? (If it required review only of bioavailability or bioequivalence data, answer "NO.")

      YES /_X_/ NO /___/

      If your answer is "no" because you believe the study is a bioavailability study and, therefore, not eligible for exclusivity, EXPLAIN why it is a bioavailability study, including your reasons for disagreeing with any arguments made by the applicant that the study was not simply a bioavailability study.

      If it is a supplement requiring the review of clinical data but it is not an effectiveness supplement, describe the change or claim that is supported by the clinical data:

   d) Did the applicant request exclusivity?

      YES /_X_/ NO /_ __/

      If the answer to (d) is "yes," how many years of exclusivity did the applicant request? 3 years

e) Has pediatric exclusivity been granted for this Active Moiety?

YES /___/ NO /_ X__/

IF YOU HAVE ANSWERED "NO" TO ALL OF THE ABOVE QUESTIONS, GO DIRECTLY TO THE SIGNATURE BLOCKS ON Page 9.

2. Has a product with the same active ingredient(s), dosage form, strength, route of administration, and dosing schedule previously been approved by FDA for the same use? (Rx to OTC) Switches should be answered No - Please indicate as such).

YES /___/ NO /_X _/

If yes, NDA # _____ Drug Name

IF THE ANSWER TO QUESTION 2 IS "YES," GO DIRECTLY TO THE SIGNATURE BLOCKS ON Page 9.

3. Is this drug product or indication a DESI upgrade?

YES /___/ NO /_X__/

IF THE ANSWER TO QUESTION 3 IS "YES," GO DIRECTLY TO THE SIGNATURE BLOCKS ON Page 9 (even if a study was required for the upgrade).

PART II: FIVE-YEAR EXCLUSIVITY FOR NEW CHEMICAL ENTITIES
(Answer either #1 or #2, as appropriate)

1. Single active ingredient product.

Has FDA previously approved under section 505 of the Act any drug product containing the same active moiety as the drug under consideration? Answer "yes" if the active moiety (including other esterified forms, salts, complexes, chelates or clathrates) has been previously approved, but this particular form of the active moiety, e.g., this particular ester or salt (including salts with hydrogen or coordination bonding) or other non-covalent derivative (such as a complex, chelate, or clathrate) has not been approved. Answer "no" if the compound requires metabolic conversion (other than

deesterification of an esterified form of the drug) to produce an already approved active moiety.

YES /_X_/ NO /___/

If "yes," identify the approved drug product(s) containing the active moiety, and, if known, the NDA #(s).

NDA # 19666 Temovate

NDA # 20-340 Temovate E

NDA # 21-142 Olux Foam

NDA #

2. Combination product.

If the product contains more than one active moiety (as defined in Part II, #1), has FDA previously approved an application under section 505 containing any one of the active moieties in the drug product? If, for example, the combination contains one never-before-approved active moiety and one previously approved active moiety, answer "yes." (An active moiety that is marketed under an OTC monograph, but that was never approved under an NDA, is considered not previously approved.)

YES /___/ NO /__N/A_/

If "yes," identify the approved drug product(s) containing the active moiety, and, if known, the NDA #(s).

NDA #

NDA #

NDA #

IF THE ANSWER TO QUESTION 1 OR 2 UNDER PART II IS "NO," GO DIRECTLY TO THE SIGNATURE BLOCKS ON Page 9. IF "YES," GO TO PART III.

PART III: <u>THREE-YEAR EXCLUSIVITY FOR NDA'S AND SUPPLEMENTS</u>

To qualify for three years of exclusivity, an application or supplement must contain "reports of new clinical investigations (other than bioavailability studies) essential to the approval of the application and conducted or sponsored by the applicant." This section should be completed only if the answer to PART II, Question 1 or 2, was "yes."

1. Does the application contain reports of clinical investigations? (The Agency interprets "clinical investigations" to mean investigations conducted on humans other than bioavailability studies.) If the application contains clinical investigations only by virtue of a right of reference to clinical investigations in another application, answer "yes," then skip to question 3(a). If the answer to 3(a) is "yes" for any investigation referred to in another application, do not complete remainder of summary for that investigation.

YES /_X__/ NO /___/

IF "NO," GO DIRECTLY TO THE SIGNATURE BLOCKS ON Page 9.

2. A clinical investigation is "essential to the approval" if the Agency could not have approved the application or supplement without relying on that investigation. Thus, the investigation is not essential to the approval if 1) no clinical investigation is necessary to support the supplement or application in light of previously approved applications (i.e., information other than clinical trials, such as bioavailability data, would be sufficient to provide a basis for approval as an ANDA or 505(b)(2) application because of what is already known about a previously approved product), or 2) there are published reports of studies (other than those conducted or sponsored by the applicant) or other publicly available data that independently would have been sufficient to support approval of the application, without reference to the clinical investigation submitted in the application.

   For the purposes of this section, studies comparing two products with the same ingredient(s) are considered to be bioavailability studies.

   (a) In light of previously approved applications, is a clinical investigation (either conducted by the applicant or available

from some other source, including the published literature) necessary to support approval of the application or supplement?

YES /_X__/ NO /___/

If "no," state the basis for your conclusion that a clinical trial is not necessary for approval **AND GO DIRECTLY TO SIGNATURE BLOCK ON Page 9:**

(b) Did the applicant submit a list of published studies relevant to the safety and effectiveness of this drug product and a statement that the publicly available data would not independently support approval of the application?

YES /_x__/ NO / /

(1) If the answer to 2(b) is "yes," do you personally know of any reason to disagree with the applicant's conclusion? If not applicable, answer NO.

YES /___/ NO /_x__/

If yes, explain:

(2) If the answer to 2(b) is "no," are you aware of published studies not conducted or sponsored by the applicant or other publicly available data that could independently demonstrate the safety and effectiveness of this drug product?

YES /___/ NO /_X__/

If yes, explain:

(c) If the answers to (b)(1) and (b)(2) were both "no," identify the clinical investigations submitted in the application that are essential to the approval:

Investigation #1, Study # 18075 (Pivotol)

Investigation #2, Study # 18076 (Pivotol)

Investigation #3, Study # 2638 (Supportive, European)

Investigation #4, Study # 2648 (Supportive, European)

Investigation #5, Study # 2665 (Supportive, European)

3. In addition to being essential, investigations must be "new" to support exclusivity. The agency interprets "new clinical investigation" to mean an investigation that 1) has not been relied on by the agency to demonstrate the effectiveness of a previously approved drug for any indication and 2) does not duplicate the results of another investigation that was relied on by the agency to demonstrate the effectiveness of a previously approved drug product, i.e., does not redemonstrate something the agency considers to have been demonstrated in an already approved application.

(a) For each investigation identified as "essential to the approval," has the investigation been relied on by the agency to demonstrate the effectiveness of a previously approved drug product? (If the investigation was relied on only to support the safety of a previously approved drug, answer "no.")

Investigation #1 YES /___/ NO /_X__/

Investigation #2 YES /___/ NO /_X__/

Investigation #3 YES /___/ NO /_X__/

If you have answered "yes" for one or more investigations, identify each such investigation and the NDA in which each was relied upon:

NDA # _____ Study #
NDA # _____ Study #

NDA # _____ Study #

(b) For each investigation identified as "essential to the approval," does the investigation duplicate the results of another investigation that was relied on by the agency to support the effectiveness of a previously approved drug product?

Investigation #1 YES /___/ NO /_ X__/

Investigation #2 YES /___/ NO /_ X__/

Investigation #3 YES /___/ NO /_ X__/

If you have answered "yes" for one or more investigations, identify the NDA in which a similar investigation was relied on:

NDA # _____ Study #

NDA # _____ Study #

NDA # _____ Study #

(c) If the answers to 3(a) and 3(b) are no, identify each "new" investigation in the application or supplement that is essential to the approval (i.e., the investigations listed in #2(c), less any that are not "new"):

Investigation #1, Study # 18075 (Pivotol)

Investigation #2, Study # 18076 (Pivotol)

Investigation #3, Study # 2638 (Supportive, European)

Investigation #4, Study # 2648 (Supportive, European)

Investigation #5, Study # 2665 (Supportive, European)

4. To be eligible for exclusivity, a new investigation that is essential to approval must also have been conducted or sponsored by the applicant. An investigation was "conducted or sponsored by" the applicant if, before or during the conduct of the investigation, 1) the applicant was the sponsor of the IND named in the form FDA 1571 filed with the Agency, or 2) the applicant (or its predecessor in interest) provided substantial support for the study. Ordinarily, substantial support will mean providing 50 percent or more of the cost of the study.

(a) For each investigation identified in response to question 3(c): if the investigation was carried out under an IND, was the applicant identified on the FDA 1571 as the sponsor?

Investigation #1, Study # 18075

IND # 60, 934 YES /_X_/ ! NO /___/ Explain:

Investigation #2, Study # 18076

IND # 60, 934 YES /_X__/ ! NO /___/ Explain:

Investigation #3, Study # 2638

IND # 60, 934 YES /_X__/ ! NO /___/ Explain:

Investigation #4, Study # 2648

IND # 60, 934 YES /_X__/ ! NO /___/ Explain:

Investigation #5, Study # 2665

IND # 60, 934 YES /_X__/ ! NO /___/ Explain:

(b) For each investigation not carried out under an IND or for which the applicant was not identified as the sponsor, did the applicant certify that it or the applicant's predecessor in interest provided substantial support for the study? N/A

Investigation #1

YES /___/ Explain _____ ! NO /___/ Explain _____

_____ ! _____

_____ ! _____

Investigation #2

YES /___/ Explain _____

_____

_____

NO /___/ Explain _____

_____

_____

(c) Notwithstanding an answer of "yes" to (a) or (b), are there other reasons to believe that the applicant should not be credited with having "conducted or sponsored" the study? (Purchased studies may not be used as the basis for exclusivity. However, if all rights to the drug are purchased (not just studies on the drug), the applicant may be considered to have sponsored or conducted the studies sponsored or conducted by its predecessor in interest.)

YES /___/ NO /_X__/

If yes, explain: _____

_____

_____

_____
Jacquelyn Smith, M.A. Date
Project Manager

_____
Jonathan Wilkin, M.D. Date
Division Director

cc:
Archival NDA
HFD- /Division File
HFD- /RPM
HFD-093/Mary Ann Holovac
HFD-104/PEDS/T.Crescenzi

Form OGD-011347
Revised 8/7/95; edited 8/8/95; revised 8/25/98, edited 3/6/00

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/s/

Stanka Kukich
2/10/04 04:57:41 PM
sign-off for Dr. Jonathan Wilkin, Division Director

DEBARMENT CERTIFICATION
(ITEM 16)

In accordance with the requirements of the Generic Drug Enforcement Act of 1992, and pursuant the Draft Guidance "Submitting Debarment Certification Statements" dated September 1998, the applicant (GALDERMA Laboratories, L.P) makes the following statement in connection with this New Drug Application for Clobetasol Propionate Shampoo, 0.05%.

GALDERMA Laboratories, L.P hereby certifies that it did not and will not use in any capacity the services of any person debarred under section 306 of the Federal Food, Drug, and Cosmetic Act in connection with this application.

APPEARS THIS WAY
ON ORIGINAL

May 2, 2003
Date

Bobbi Woodward
Signature

Bobbi WOODWARD
Manager
Regulatory Affairs
GALDERMA Laboratories, L.P.

PEDIATRIC PAGE

(Complete for all filed original applications and efficacy supplements)

NDA/BLA #: 21-644 **Supplement Type (e.g. SE5):** _____ **Supplement Number:**

HFD-540 **Trade and generic names/dosage form:** Clobex (clobetasol propionate) Shampoo, 0.05%

Applicant: Galderma Laboratories, L.P. **Therapeutic Class:** 3S

Indication(s) previously approved:

Each approved indication must have pediatric studies: Completed, Deferred, and/or Waived.

Number of indications for this application(s): 1

Indication #1: Topical treatment of moderate to severe forms of scalp psoriasis.

Is there a full waiver for this indication (check one)?

- ☐ **Yes: Please proceed to Section A.**

- X **No: Please check all that apply:** X **Partial Waiver** X **Deferred** ___ **Completed**
  NOTE: More than one may apply
  Please proceed to Section B, Section C, and/or Section D and complete as necessary.

Section A: Fully Waived Studies

Reason(s) for full waiver:

- ☐ **Products in this class for this indication have been studied/labeled for pediatric population**
- ☐ **Disease/condition does not exist in children**
- ☐ **Too few children with disease to study**
- ☐ **There are safety concerns**
- ☐ **Other:** _____

If studies are fully waived, then pediatric information is complete for this indication. If there is another indication, please see Attachment A. Otherwise, this Pediatric Page is complete and should be entered into DFS.

Section B: Partially Waived Studies

Age/weight range being partially waived:

Min	**kg**	**mo.**	**yr.** 0	**Tanner Stage**	
Max	**kg**	**mo.**	**yr.** 11	**Tanner Stage**	

Reason(s) for partial waiver:

- ☐ **Products in this class for this indication have been studied/labeled for pediatric population**
- ☐ **Disease/condition does not exist in children**
- ☐ **Too few children with disease to study**
- X **There are safety concerns**
- ☐ **Adult studies ready for approval**
- ☐ **Formulation needed**
- ☐ **Other:** _____

If studies are deferred, proceed to Section C. If studies are completed, proceed to Section D. Otherwise, this Pediatric Page is complete and should be entered into DFS.

Section C: Deferred Studies

Age/weight range being deferred:

Min _____ kg_____ mo._____ yr.__12___ Tanner Stage_____
Max_____ kg_____ mo._____ yr.__17___ Tanner Stage_____

Reason(s) for deferral:

- ☐ **Products in this class for this indication have been studied/labeled for pediatric population**
- ☐ **Disease/condition does not exist in children**
- ☐ **Too few children with disease to study**
- X **There are safety concerns**
- ☐ **Adult studies ready for approval**
- ☐ **Formulation needed**

Other: Phase 4 commitment to conduct HPA Axis suppression study.

Date studies are due (mm/dd/yy): _____

If studies are completed, proceed to Section D. Otherwise, this Pediatric Page is complete and should be entered into DFS.

Section D: Completed Studies

Age/weight range of completed studies:

Min _____ kg_____ mo._____ yr._ Tanner Stage_____
Max_____ kg_____ mo.____ yr._ Tanner Stage_____

Comments:

If there are additional indications, please proceed to Attachment A. Otherwise, this Pediatric Page is complete and should be entered into DFS.

This page was completed by:

{See appended electronic signature page}

_____

Jacquelyn Smith, M.A.
Regulatory Project Manager

cc: NDA
HFD-960/Grace Carmouze
(revised 12-22-03)

FOR QUESTIONS ON COMPLETING THIS FORM CONTACT THE DIVISION OF PEDIATRIC DRUG DEVELOPMENT, HFD-960, 301-594-7337.

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/s/

Jill Lindstrom
2/2/04 05:29:18 PM

Stanka Kukich
2/5/04 10:45:49 AM

NDA 21-644
Clobex Shampoo, 0.05%

Memo to File

Date: February 9, 2004

Subject: PREA Postmarketing Commitment #6

Please note that the pediatric commitment under PREA listed in the, February 5, 2004, Approval (AP) letter for NDA 21-644, Clobex Shampoo, 0.05% has been assigned PMC #6. This postmarketing study commitment number was not listed in the approval letter.

Sincerely,

Jacquelyn Smith
Project Manager

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/s/

Jacquelyn Smith
2/10/04 12:57:16 PM
CSO

Food and Drug Administration
Center for Drug Evaluation and Research
Office of Drug Evaluation ODE 5

FACSIMILE TRANSMITTAL SHEET

DATE: January 28, 2004

To: Susan Pickrel, Regulatory Affairs Associate	**From:** Jacquelyn Smith, Project Manager
Company: Galderma Laboratories	Division of Dermatologic and Dental Drug Products
Fax number: 817-961-0020	**Fax number:** 301-827-2075
Phone number: 817-961-5000	**Phone number:** 301-827-2027

Subject: NDA 21-644/Clobex Shampoo
January 15, 2004 Telecon

Total no. of pages including cover: 5

Comments:

Document to be mailed: ☐ YES X NO

MEMORANDUM OF TELECON

DATE: January 15, 2004 **TIME:** 2:30 PM

APPLICATION NUMBER: NDA 21-644

DRUG PRODUCT: Clobex Shampoo, 0.05%

BETWEEN:

Name: Paul Clark, VP, Regulatory and Technical Affairs
Susan Pickrel, Regulatory Affairs Associate
Michael Graeber, M.D., Head of US Clinical Development
Christian Loesche, M.D., Director of Global Clinical Studies, France

Phone: (817) 961-5000
Representing: Galderma Laboratories, L.P.

AND

Name: Division of Dermatologic and Dental Drug Products, HFD-540
Stanka Kukich, M.D., Deputy Division Director
Markham Luke, M.D., Ph.D., Team Leader, Clinical
Jill Lindstrom, M.D., Medical Officer
Wilson DeCamp, Ph.D., Team Leader, Chemistry
Jacquelyn Smith, Regulatory Project Manager

Subject: Phase 4 Commitments & USP Nomenclature

The teleconference was scheduled to discuss NDA 21-644, Clobex Shampoo, 0.05%, in regard to the following information requested by the Sponsor.

1. Since the product is indicated for use in patients >18 years of age, the Sponsor made the request to drop this population from the HPA axis suppression study and commit to a study in 30 evaluable adult subjects.

   The Division responded that a signal for HPA axis suppression among adolescents was identified, so a study to better characterize this risk is warranted.

   The Sponsor agreed.

2. The Sponsor requested information as to the design of safety and efficacy study in non-Caucasians. The Sponsor was seeking advice from the Division as to what kind of data the Division was looking for, e.g. including Caucasians also or just non-Caucasians.

   The Division suggested that the Sponsor gather safety and efficacy data from Non Caucasians as sufficient data for Caucasians was submitted in the original NDA.

3. The Sponsor stated that the names of some of the inactive ingredients are not consistent with USP nomenclature, specifically ethyl alcohol, citric acid monohydrate, and sodium citrate dihydrate. The USP names are alcohol, citric acid, and sodium citrate. The Sponsor made the request to use the USP names if there was no objection from the Division.

The Division responded that as long as the drug product is a solution, it is not necessary to include the state of hydration for citric acid or sodium citrate. Also, "alcohol" (without qualification) means ethyl alcohol in USP.

The conversation ended amicably.

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/s/

Stanka Kukich
1/28/04 12:57:24 PM

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/s/

Jacquelyn Smith
1/28/04 01:39:46 PM
CSO

Food and Drug Administration
Center for Drug Evaluation and Research
Office of Drug Evaluation ODE 5

FACSIMILE TRANSMITTAL SHEET

DATE: January 21, 2004

To: Susan Pickrel, Regulatory Affairs Associate	**From:** Jacquelyn Smith, Project Manager
Company: Galderma Laboratories	Division of Dermatologic and Dental Drug Products
Fax number: 817-961-0020	**Fax number:** 301-827-2075
Phone number: 817-961-5355	**Phone number:** 301-827-2027

Subject: NDA 21-644/120203 CMC tcon

Total no. of pages including cover: 4

Comments: Please see following page(s).

Document to be mailed: ☐ YES X NO

MEMORANDUM OF TELECON

DATE: December 2, 2003, 2:30 PM

APPLICATION NUMBER: NDA 21-644

DRUG PRODUCT: Clobex Shampoo, 0.05%

BETWEEN:

Name: Paul Clark, VP, Regulatory and Technical Affairs
Susan Pickrel, Regulatory Affairs Associate
Allen Brinkley, Director, Technical Affairs

Phone: (817) 961-5000
Representing: Galderma Laboratories, L.P.

AND

Name: Division of Dermatologic and Dental Drug Products, HFD-540
Saleh Turujman, Ph.D., Chemist
Jacquelyn Smith, Regulatory Project Manager

SUBJECT: NDA 21-644

The teleconference was requested by the Agency to discuss NDA 21-644, Clobex Shampoo, 0.05%, in regard to the following CMC Issues:

1. Water content/ Actual Amount of Ingredients present in Clobex Shampoo:
The Sponsor was asked to amend the composition table to reflect the actual amount of water present due to the three ingredients containing water. Please also amend the composition table to reflect the actual amount of ingredient present in the drug product (the three aqueous excipients, alcohol, sodium laureth sulfate. and coco-betaine, contain [redacted] respectively, of the stated excipient).

The Sponsor questioned amending the composition table and asked that Dr. Turujman discuss the matter with Dr. DeCamp, Chemistry Team Leader.

2. Solubility [redacted]
The Agency asked The Sponsor the following question:

How do you ascertain that clobetasol propionate [redacted]

The applicant will add a microscopic test to ascertain the absence of particulate matter to the attribute of appearance, [redacted]

The conversation ended amicably.

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/s/

Saleh Turujman
1/21/04 12:19:25 PM
Concur with minutes

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/s/

Jacquelyn Smith
1/21/04 02:25:25 PM
CSO

Food and Drug Administration
Center for Drug Evaluation and Research
Office of Drug Evaluation ODE 5

FACSIMILE TRANSMITTAL SHEET

DATE: January 9, 2004

To: Susan Pickrel Regulatory Affairs Associate	**From:** Jacquelyn Smith, Project Manager
Company: Galderma Laboratories	Division of Dermatologic and Dental Drug Products
Fax number: 817-961-0020	**Fax number:** 301-827-2075
Phone number: 817-961-5355	**Phone number:** 301-827-2027

Subject: NDA 21-644/Clobex Shampoo
12-30-03 tcon

Total no. of pages including cover: 4

Comments: Please see following page(s).

Document to be mailed: ☐ YES X NO

MEMORANDUM OF TELECON

DATE: December 30, 2003, 2:30 PM

APPLICATION NUMBER: NDA 21-644

DRUG PRODUCT: Clobex Shampoo, 0.05%

BETWEEN:

Name: Paul Clark, VP, Regulatory and Technical Affairs
Susan Pickrel, Regulatory Affairs Associate

Phone: (817) 961-5000
Representing: Galderma Laboratories, L.P.

AND

Name: Division of Dermatologic and Dental Drug Products, HFD-540
Stanka Kukich, M.D., Deputy Division Director
Jill Lindstrom, M.D., Medical Officer
Jacquelyn Smith, Regulatory Project Manager

SUBJECT: Labeling

The teleconference was scheduled to discuss NDA 21-644, Clobex Shampoo, 0.05%, in regard to the draft labeling. The following changes were agreed upon.

1. Under CLINICAL STUDIES, second line: change [redacted] to EVALUATED

2. Footnote 2: add AT FOUR (4) WEEKS

3. Under ADVERSE REACTIONS, second paragraph, line 1, replace THE with SELECTED

4. Under ADVERSE REACTIONS, table title, insert SELECTED before ADVERSE EVENTS

5. Table: delete lines: [redacted]

6. [redacted]

The conversation ended amicably.

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/s/

Stanka Kukich
1/8/04 05:02:14 PM

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/s/

Jacquelyn Smith
1/9/04 02:59:38 PM
CSO

Food and Drug Administration
Center for Drug Evaluation and Research
Office of Drug Evaluation ODE 5

FACSIMILE TRANSMITTAL SHEET

DATE: December 24, 2003

To: Susan Pickrel, Regulatory Affairs Associate	**From:** Jacquelyn Smith, Project Manager
Company: Galderma Laboratories	Division of Dermatologic and Dental Drug Products
Fax number: 817-961-0020	**Fax number:** 301-827-2075
Phone number: 817-961-5355	**Phone number:** 301-827-2027

Subject: NDA 21-644/Clobex Shampoo 12-17-03 CMC Tcon

Total no. of pages including cover: 4

Comments:

Document to be mailed: ☐ YES X NO

MEMORANDUM OF TELECON

DATE: December 17, 2003, 1:30 PM

APPLICATION NUMBER: NDA 21-644

DRUG PRODUCT: Clobex Shampoo, 0.05%

BETWEEN:

Name: Paul Clark, VP, Regulatory and Technical Affairs
Susan Pickrel, Regulatory Affairs Associate
Allen Brinkley, Director, Technical Affairs

Phone: (817) 961-5000
Representing: Galderma Laboratories, L.P.

AND

Name: Division of Dermatologic and Dental Drug Products, HFD-540
Wilson DeCamp, Ph.D., Chemistry Team Leader
Saleh Turujman, Ph.D., Chemist
Jacquelyn Smith, Regulatory Project Manager

SUBJECT: NDA 21-644

In a follow up teleconference on December 17, 2003, the following two additional points were made (concerning solubility of clobetasol propionate in the shampoo):

The Applicant was informed that if no particulates were found at the expiration date of the —— —— commercial batches placed on stability, a supplement may be submitted to drop the microscopic testing.

The Applicant stated that they also have data to show that the concentration of clobetasol propionate in the shampoo is —— of the saturation point.

The Applicant was requested in a teleconference on December 17, 2003, to restate the formulations table to reflect the actual amount of water present in the final formulation due to the contribution of the five ingredients containing water. Alternatively, an additional composition table of the drug product could be provided. The Applicant was also requested to insert in the restated (or additional) Table the actual amount of each ingredient present in the drug product (the three aqueous excipients, alcohol, sodium laureth sulfate, and coco-betaine, contain —— ——— , respectively, of the stated excipient, and the citric acid and sodium citrate —— are added as solutions.

The conversation ended amicably.

Addendum: The requested information, dated December 18, 2003, was faxed on December 22, 2003.

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/s/

Wilson H. DeCamp
12/23/03 03:35:37 PM
concur; minutes are accurate

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/s/

Jacquelyn Smith
12/24/03 08:38:26 AM
CSO

GALDERMA
USA

December 23, 2003

Food and Drug Administration
Division of Dermatological and Dental Drug Products (HFD-540)
Center for Drug Evaluation and Research
ATTENTION: Markham Luke, M.D.
9201 Corporate Blvd.
Rockville, Maryland 20850

RE: NDA 21-644
CLOBEX™ (clobetasol propionate) Shampoo, 0.05%
Applicant Agreement to Phase 4 Commitments

Dear Dr. Luke:

The applicant agrees to perform the Phase 4 studies as described in the attached fax dated December 23, 2003. The applicant further agrees to comply with the timelines unless other provisions are agreed to by the Agency.

Sincere regards,

Paul M. Clark
Vice President, Regulatory Affairs
Telephone: 817-961-5336
Fax: 817-961-0020

APPEARS THIS WAY
ON ORIGINAL

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville MD 20857

DEC 4 2003

Mark G. Lebwohl, M.D.
5 East 98th Street
New York, New York 10029

Dear Dr. Lebwohl:

Between October 29 and 30, 2003, Messrs. Thomas P. Hansen and Robert C. Steyert, representing the Food and Drug Administration (FDA), conducted an investigation and met with you to review your conduct of a clinical investigation (Protocol RD.06.SPR.18075 entitled: "A Randomized, Double-Blind, Parallel Group Evaluation of Clobetasol Propionate Shampoo, 0.05% Versus Its Vehicle – An Efficacy and Safety Study in Subjects With Scalp Psoriasis") of the investigational drug Clobex™ (clobetasol propionate) 0.05% Shampoo, performed for Galderma Laboratories, L.P. This inspection is a part of FDA's Bioresearch Monitoring Program, which includes inspections designed to evaluate the conduct of research and to ensure that the rights, safety, and welfare of the human subjects of the study have been protected.

From our evaluation of the establishment inspection report and the documents submitted with that report, we conclude that you adhered to the applicable statutory requirements and FDA regulations governing the conduct of clinical investigations and the protection of human subjects.

We appreciate the cooperation shown Investigators Hansen and Steyert during the inspection. Should you have any questions or concerns regarding this letter or the inspection, please contact me by letter at the address given below.

Sincerely yours,

/S/

Khin Maung U, M.D.
Branch Chief
Good Clinical Practice Branch I, HFD-46
Division of Scientific Investigations
Office of Medical Policy
Center for Drug Evaluation and Research
7520 Standish Place, Room 125
Rockville, MD 20855

FEI: ————
Field Classification: NAI
Headquarters Classification: NAI
No Form FDA 483 was issued

cc:
HFA-224
HFD-540 Doc.Rm. NDA 21-644
HFD-540 Division Director Wilkin
HFD-540 MO Lindstrom
HFD-540 PM Smith
HFD-47c/r/s/ GCP File #3012
HFD-47 Blay/Hajarian
HFR-NE150 DIB Woyshner
HFR-NE1500 BIMO Monitor and Investigator Hansen
HFR-NE1500 Investigator Steyert
GCF-1 Seth Ray

r/d:GRH:11/20/03
KMU:12/1/03
F/t: SG: 12/3/03

O:\GRH\LEBWOHL NAI.DOC

Reviewer's Note to Review Division Medical Officer

Protocol RD.06.SPR.18075

Eleven subjects were randomized and 8 completed the study. Two subjects discontinued for personal reasons and one subject on the vehicle arm experienced a worsening of the psoriasis. Signed and dated informed consents were on file for all subjects. The records of all subjects were reviewed. All subjects satisfied inclusion/exclusion criteria. Global Severity Scores were consistent between source documents and case report forms. There were no serious adverse events reported and no major protocol deviations. No Form FDA 483 was issued.

The data from subjects at this site can be used for evaluation of Protocol RD.06.SPR.18075 submitted in support of NDA 21-644.

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/s/

Khin U
12/4/03 02:36:59 PM

CONSULTATION RESPONSE

DIVISION OF MEDICATION ERRORS AND TECHNICAL SUPPORT
OFFICE OF DRUG SAFETY
(DMETS; HFD-420)

DATE RECEIVED: July 15, 2003	**DUE DATE:** December 3, 2003 **PDUFA Date:** March 6, 2004	**ODS CONSULT #:** 03-0259

TO: Jonathan Wilkin, M.D.
Director, Division of Dermatological and Dental Drug Products
HFD-540

THROUGH: Jacqueline Smith
Project Manager
HFD-540

PRODUCT NAME: **Clobex Shampoo** (Clobetasol Propionate Shampoo) 0.05% **NDA 21-644**	**NDA SPONSOR:** **Galderma Laboratories, L.P.**

SAFETY EVALUATOR: Denise P. Toyer, Pharm.D.

SUMMARY: In response to a consult from the Division of Dermatological and Dental Drug Products (HFD-540), the Division of Medication Errors and Technical Support (DMETS) conducted a review of the proposed proprietary name "Clobex Shampoo" to determine the potential for confusion with approved proprietary and established names as well as pending names.

RECOMMENDATIONS:

1. DMETS has no objections to the use of the proprietary name, Clobex Shampoo.
2. DMETS also recommends implementation of the labeling revisions outlined in Section III.
3. DDMAC finds the proprietary name Clobex Shampoo acceptable from a promotional perspective.

Carol Holquist, RPh
Deputy Director,
Division of Medication Errors and Technical Support
Office of Drug Safety
Phone: (301) 827-3242 Fax: (301) 443-9664

Jerry Phillips, RPh
Associate Director
Office of Drug Safety
Center for Drug Evaluation and Research
Food and Drug Administration

Division of Medication Errors and Technical Support (DMETS)
Office of Drug Safety
HFD-420; PKLN Rm. 6-34
Center for Drug Evaluation and Research

PROPRIETARY NAME REVIEW

DATE OF REVIEW:	**November 5, 2003**
NDA:	**21-644**
DRUG:	Clobex Shampoo (Clobetasol Propionate Shampoo) 0.05%
NDA HOLDER:	**Galderma Laboratories, L.P.**

I. INTRODUCTION:

This consult was written in response to a request from the Division of Dermatologic and Dental Drug Products to review the proprietary name Clobex Shampoo, regarding potential name confusion with other proprietary and established names. The container labels, carton labeling and package insert labeling for Clobex Shampoo were submitted and reviewed for possible interventions in minimizing medication errors.

PRODUCT INFORMATION

Clobex Shampoo is the proposed proprietary name for clobetasol propionate shampoo, 0.05%, which is a synthetic fluorinated corticosteroid for topical dermatologic use. The proprietary name, Clobex Lotion, was reviewed by DMETS and found acceptable on June 6, 2003. The new drug application (NDA# 21-535) for Clobex Lotion was approved on July 24, 2003. Clobetasol propionate has anti-inflammatory, antipruritic, and vasoconstrictive properties. It is indicated for [redacted] moderate to severe forms of scalp psoriasis. Clobex Shampoo should be applied to lesion(s) on the scalp once a day and left in place for fifteen minutes before lathering and rinsing. Treatment should be limited to four consecutive weeks. This drug will be supplied in 4 ounce (118 ml) bottles.

II. RISK ASSESSMENT:

A search was conducted of several standard published drug product reference texts[1,2] as well as several FDA databases[3] for existing drug names which sound-alike or look-alike to Clobex Shampoo to a degree where potential confusion between drug names could occur under the usual clinical practice settings. A search of the electronic online version of the U.S. Patent and Trademark Office's Text and Image Database[4] was also conducted. The standard DMETS prescription analysis studies were not conducted because the proprietary name Clobex was approved on June 6, 2003. DMETS searched the FDA Adverse Event Reporting System (AERS) database in order to determine any post-marketing safety reports of medication errors associated with Clobex.

A. REFERENCE SEARCH

The search of the reference texts and databases did not identify any additional sound-alike or look-alike names of concern that were not addressed during the Clobex Lotion proprietary name review. During the review of Clobex Lotion, DMETS evaluated Rubex, Klotrix, Clorpress, Cobex, Probax, and Klorvess as potential look-alike and or sound-alike names to Clobex.

B. PHONETIC ORTHOGRAPHIC COMPUTER ANALYSIS (POCA)

As part of the name similarity assessment, proposed names are evaluated via a phonetic/orthographic database that is in the final stages of development for DMETS. The entered search term is converted into its phonemic representation before it runs though the phonetic algorithm. The phonetic search module returns a numeric score to the search engine based on the phonetic similarity to the input text. Likewise, an orthographic algorithm exists which operates in a similar fashion. The POCA search did not identify any additional names of concern that were not identified by the expert panel discussion.

C. AERS SEARCH

The Adverse Event Reporting System (AERS) was searched for all post-marketing safety reports of medication errors associated with Clobex Shampoo. The MEDDRA Preferred Terms (PT) "Medication Error" and "Overdose" and the drug names of "Clobex," and "Clobe" were used as search criteria. The search did not identify any reports of name confusion or other medication errors association with Clobex.

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[1] MICROMEDEX Integrated Index, 2003, MICROMEDEX, Inc., 6200 South Syracuse Way, Suite 300, Englewood, Colorado 80111-4740, which includes all products/databases within ChemKnowledge, DrugKnowledge, and RegsKnowledge Systems.

[2] Facts and Comparisons, online version, Facts and Comparisons, St. Louis, MO.

[3] WWW location http://www.uspto.gov/tmdb/index.html

[4] Data provided by Thomson & Thomson's SAEGIS ™ Online Service, available at www.thomson-thomson.com

D. SAFETY EVALUATOR RISK ASSESSMENT

The root name, Clobex, was approved by the FDA on June 6, 2003. During the proprietary name review for Clobex Lotion; Rubex, Klotrix, Clorpress, Cobex, Probax, and Klorvess were evaluated for potential sound-alike and look-alike confusion. The potential for name confusion between Clobex Lotion and Rubex, Klotrix, Clorpress, Cobex, Probax, and Klorvess was minimal based on differences in the product characteristics.

The proposed proprietary name, Clobex Shampoo, is a different dosage form (shampoo vs. lotion) and has a different dosing interval (daily vs. two times a day) than Clobex Lotion. However, these differences in product characteristics do not increase the potential for name confusion between Clobex and Rubex, Klotrix, Clorpress, Cobex, Probax, or Klorvess. Thus, the potential for name confusion with Clobex and the aforementioned products is minimal.

The AERS search did not identify any reports of name confusion between Clobex and other currently marketed products. However, there is the potential for confusion within the Clobex product line. Upon approval of this NDA, there will be two products available, Clobex Lotion and Clobex Shampoo. The availability of two different dosage formulations may increase the potential of selection errors. Thus, the labels and labeling for Clobex Lotion and Clobex Shampoo must be differentiated from each other.

III. LABELING, PACKAGING, AND SAFETY RELATED ISSUES:

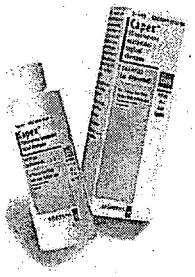
In the review of the container labels, carton and insert labeling of Clobex Shampoo, DMETS has attempted to focus on safety issues relating to possible medication errors. DMETS has reviewed the current container labels, carton and insert labeling and has identified the following areas of possible improvement, which might minimize potential user error.

A. The labels and labeling were submitted in draft black and white format. Thus, DMETS was unable to assess if there are any safety issues due to the use of color fonts, graphics etc.

B. To minimize selection errors due to look-alike labeling and packaging, within the Clobex product line, ensure adequate differentiation of the various Clobex products

C. The Clobex Lotion logo (see below) was obtained from the Galderma website. From the presentation provided it appears that the established name is not presented in accordance with CFR § 201.10. If a similar logo will be used for Clobex Shampoo then the established name must be at least half the size of the proprietary name.

D. Although, Capex Shampoo, another Galderma product, does not look or sound similar to Clobex, there is the potential that both products may be stored in close proximity on a shelf. Thus increasing the potential for selection errors to occur. To avoid this we recommend using different colors so that there are significant package differences to distinguish the two products.



E. The phrases "For external Use Only" and "Not for Ophthalmic Use" should appear on the principal display panel. Revise accordingly.

F. DMETS' comments pertaining to the Patient Information Sheet were included in the Division of Surveillance, Research, and Communication Support's October 30, 2003 review (ODS/DSRCS Review of Patient Labeling for Clobex).

IV. RECOMMENDATIONS:

A. DMETS has no objections to the use of the proprietary name Clobex. DMETS considers this a final review. However, if approval of this NDA is delayed beyond 90 days from the date of this review, then the firm should be notified that this name with its associated labels and labeling must be re-evaluated approximately 90 days prior to the approval of the expected approval of the NDA. A re-review of the name prior to NDA approval will rule out any objections based upon approvals of other proprietary and established names from the signature date of this document.

B. DMETS also recommends implementation of the labeling revisions outlined in Section III. We would be willing to revisit these issues if the Division receives another draft of the labeling from the manufacturer.

C. DDMAC finds the proprietary name Clobex Shampoo acceptable from a promotional perspective.

DMETS would appreciate feedback of the final outcome of this consult. We would be willing to meet with the Division for further discussion, if needed. If you have further questions or need clarifications, please contact Sammie Beam, project manager, at 301-827-3242.

Denise P. Toyer, Pharm.D.
Safety Evaluator
Division of Medication Errors and Technical
Office of Drug Safety

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/s/

Denise Toyer
11/21/03 10:25:20 AM
DRUG SAFETY OFFICE REVIEWER

Jerry Phillips
11/21/03 10:31:09 AM
DRUG SAFETY OFFICE REVIEWER

Food and Drug Administration
Center for Drug Evaluation and Research
Office of Drug Evaluation ODE 5

FACSIMILE TRANSMITTAL SHEET

DATE: November 6, 2003

To: Susan Pickrel Regulatory Affairs Associate	**From:** Jacquelyn Smith, Project Manager
Company: Galderma Laboratories	Division of Dermatologic and Dental Drug Products
Fax number: 817-961-0020	**Fax number:** 301-827-2075
Phone number: 817-961-5355	**Phone number:** 301-827-2027

Subject: NDA 21-644/Clobex Shampoo

Total no. of pages including cover: 3

Comments: Please see following page(s).

Document to be mailed: ☐ YES X NO

NDA 21-644

FDA Fax Memo

Date: November 6, 2003

Subject: NDA 21-644/Clobex Shampoo

Dear Ms. Pickrel:

In study 1.CG.03.SPR.2620, skin atrophy was assessed by ultrasound. Please provide individual line listings for the ultrasound measurements of dermis and epidermis. Please provide justification/validation of methods used. Submission of requested information by November 14, 2003 would be greatly appreciated.

Please submit the above information officially to the NDA, as well as, by fax to my attention. My fax number is 301-827-2075.

Thank You,

Jacquelyn Smith
Project Manager
DDDDP, HFD-540

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/s/

Jacquelyn Smith
11/6/03 11:50:17 AM
CSO

DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
Rockville MD 20857

NOV 2 2003

Michael T. Jarratt, M.D.
Derm Research, Inc.
8140 North Mopac
Building 3, Suite 120
Austin, Texas 78759

Dear Dr. Jarratt:

Between September 15 and 16, 2003, Mr. Joel Martinez, representing the Food and Drug Administration (FDA), conducted an investigation and met with you to review your conduct of a clinical investigation (Protocol RD.06.SPR.18076 entitled: "A Randomized, Double-Blind, Parallel Group Evaluation of Clobetasol Propionate Shampoo, 0.05% Versus Its Vehicle – An Efficacy and Safety Study in Subjects With Scalp Psoriasis") of the investigational drug Clobex™ (clobetasol propionate) 0.05% Shampoo, performed for Galderma Laboratories, LP. This inspection is a part of FDA's Bioresearch Monitoring Program, which includes inspections designed to evaluate the conduct of research and to ensure that the rights, safety, and welfare of the human subjects of the study have been protected.

From our evaluation of the establishment inspection report and the documents submitted with that report, we conclude that you adhered to the applicable statutory requirements and FDA regulations governing the conduct of clinical investigations and the protection of human subjects.

We appreciate the cooperation shown Investigator Martinez during the inspection. Should you have any questions or concerns regarding this letter or the inspection, please contact me by letter at the address given below.

Sincerely yours,

/S/

Joseph P. Salewski
Acting Director
Good Clinical Practice Branch II, HFD-47
Division of Scientific Investigations
Office of Medical Policy
Center for Drug Evaluation and Research
7520 Standish Place, Room 125
Rockville, MD 20855

FEI: [redacted]
Field Classification: NAI
Headquarters Classification: NAI
No Form FDA 483 was issued

cc:
HFA-224
HFD-540 Doc.Rm. NDA 21-644
HFD-540 Division Director Wilkin
HFD-540 MO Lindstrom
HFD-540 PM Smith
HFD-47c/r/s/ GCP File #5061
HFD-47 Hajarian
HFR-SW150 DIB Thornburg
HFR-SW1540 BIMO Monitor and Investigator Martinez
GCF-1 Seth Ray

r/d:GRH:10/1/03
reviewed:JPS:10/16/03
final:GRH:10/22/03

O:\GRH\JARRATT II NAI.DOC

Reviewer's Note to Review Division Medical Officer

Protocol RD.06.SPR.18076

Of 21 subjects screened, 15 were randomized and all 15 completed the study. Signed and dated informed consents were on file for all subjects. The records of all 15 subjects were reviewed. All subjects satisfied inclusion/exclusion criteria. Global Severity Scores were consistent between source documents and case report forms. There were no serious adverse events reported and no major protocol deviations. No Form FDA 483 was issued.

The data from subjects at this site can be used for evaluation of Protocol RD.06.SPR.18076 submitted in support of NDA 21-644.

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/s/

Joseph Salewski
11/10/03 11:17:32 AM

MEMORANDUM

DEPARTMENT OF HEALTH AND HUMAN SERVICES
PUBLIC HEALTH SERVICE
FOOD AND DRUG ADMINISTRATION
CENTER FOR DRUG EVALUATION AND RESEARCH

DATE: October 30, 2003

TO: Jonathan Wilkin, M.D.
Director, Division of Dermatologic and Dental Products
HFD-540

VIA: Jacquelyn Smith, Regulatory Health Project Manager
Division of Dermatologic and Dental Products
HFD-540

FROM: Jeanine Best, M.S.N., R.N., P.N.P.
Patient Product Information Specialist
Division of Surveillance, Research, and Communication Support
HFD-410

THROUGH: Toni Piazza-Hepp, Pharm. D., Acting Director
Division of Surveillance, Research, and Communication Support
HFD-410

SUBJECT: ODS/DSRCS Review of Patient Labeling for Clobex (clobestasol propionate) Shampoo, 0.05%, NDA 21-644

The patient labeling which follows represents the revised risk communication materials of the Patient Labeling for Clobex (clobestasol propionate) Shampoo, 0.05%, NDA 21-644. It has been reviewed by our Office (DSRCS and DMETS) and by DDMAC. We have simplified the wording, made it consistent with the PI, removed promotional language and other unnecessary information (the purpose of patient information leaflets is to enhance appropriate use and provide important risk information about medications), and put it in the format that we are recommending for all patient information. Our proposed changes are known through research and experience to improve risk communication to a broad audience of varying educational backgrounds. These revisions are based on draft labeling submitted by the sponsor on May 2, 2003. Patient information should always be consistent with the prescribing information. All future changes to the PI should also be reflected in the PPI. We also made the information consistent with that of the recently approved Clobex Lotion Patient Information.

Comments to the review Division are bolded, italicized, and underlined. We can provide marked-up and clean copies of the revised document in Word if requested by the review division. Please let us know if you have any questions.

4 page(s) of draft labeling has been removed from this portion of the review.

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/s/

Jeanine Best
10/30/03 01:42:11 PM
DRUG SAFETY OFFICE REVIEWER

Toni Piazza Hepp
10/30/03 04:38:09 PM
DRUG SAFETY OFFICE REVIEWER

MEMORANDUM

DEPARTMENT OF HEALTH AND HUMAN SERVICES
Public Health Service
Food and Drug Administration
Center for Drug Evaluation and Research
Division of Drug Marketing, Advertising, and Communications

Predecisional Agency Information

Date: October 14, 2003

From: Sonny Saini, Pharm.D. – DDMAC
Iris Masucci, Pharm.D. - DDMAC

To: Jacquelyn Smith

Re: Clobex (clobetasol propionate) Shampoo, 0.05%
NDA 21-644

Clinical Pharmacology

Pharmacokinetics:

- We recommend including the statement [redacted]
- [redacted]

Clinical Studies

- [redacted]

- In the table of results for Studies A and B, results are given for four parameters (erythema, scaling, plaque thickening, and pruritus). Are these the subscales/questions from the Global Severity Score (GSS)? This is unclear. Perhaps a brief explanation of the components of the GSS would be helpful, either in text or in footnote 1 of the table.

Indications and Usage

- The Clobex Lotion 0.05% PI states in the Indications and Usage section that "the total dosage should not exceed 50 g (50 mL or 1.75 fl. oz.) per week." Is there similar information for Clobex Shampoo? If so, we recommend incorporating this information in this section.

Precautions

- The Clobex Lotion 0.05% PI states in the Precautions section that "Clobetasol propionate is a highly potent topical corticosteroid that has been shown to suppress the HPA axis at the lowest doses tested." Does this also apply to Clobex Shampoo? If so, we recommend including this information as a bolded statement in this section in order to be consistent with the Clobex Lotion 0.05% PI.

•

•

Information for Patients:

- The Clobex Lotion 0.05% PI states in the Information for Patients section that "Patients should be informed to not use more than 50 g (50 mL or 1.75 fl. oz.) per week of Clobex Lotion, 0.05%." Is there similar information for Clobex Shampoo? If so, we recommend incorporating this information in this section.
-

Pregnancy

- We recommend that the fourth paragraph in this section include the statement "Abnormalities seen included low fetal weights, umbilical herniation, cleft palate, reduced skeletal ossification, —other skeletal abnormalities" to maintain consistency with the Clobex Lotion 0.05% PI.

Dosage and Administration

•

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/s/

Sonny Saini
10/14/03 10:44:39 AM
DDMAC REVIEWER

DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION

APPLICATION TO MARKET A NEW DRUG, BIOLOGIC, OR AN ANTIBIOTIC DRUG FOR HUMAN USE

(Title 21, Code of Federal Regulations, Parts 314 & 601)

Form Approved: OMB No. 0910-0338
Expiration Date: August 31, 2005
See OMB Statement on page 2.

FOR FDA USE ONLY

APPLICATION NUMBER

APPLICANT INFORMATION

NAME OF APPLICANT	DATE OF SUBMISSION
Galderma Laboratories, L.P.	19-SEP-2003
TELEPHONE NO. *(Include Area Code)* 817.961.5335	FACSIMILE (FAX) Number *(Include Area Code)* 817.961.0020
APPLICANT ADDRESS *(Number, Street, City, State, Country, ZIP Code or Mail Code, and U.S. License number if previously issued)*: 14501 North Freeway Fort Worth, Texas 76177	AUTHORIZED U.S. AGENT NAME & ADDRESS *(Number, Street, City, State, ZIP Code, telephone & FAX number)* IF APPLICABLE

PRODUCT DESCRIPTION

NEW DRUG OR ANTIBIOTIC APPLICATION NUMBER, OR BIOLOGICS LICENSE APPLICATION NUMBER *(If previously issued)*
New Drug Application 21-644

ESTABLISHED NAME *(e.g., Proper name, USP/USAN name)*	PROPRIETARY NAME *(trade name)* IF ANY
Clobetasol Propionate Shampoo, 0.05%	Clobex Shampoo

CHEMICAL/BIOCHEMICAL/BLOOD PRODUCT NAME *(If any)*	CODE NAME *(If any)*
Clobetasol Proprionate	662.066

DOSAGE FORM:	STRENGTHS:	ROUTE OF ADMINISTRATION:
Shampoo	0.05%	Topical

(PROPOSED) INDICATION(S) FOR USE:
For the treatment of moderate to severe forms of ——————— scalp soriasis.

APPLICATION INFORMATION

APPLICATION TYPE *(check one)* ☒ NEW DRUG APPLICATION (NDA, 21 CFR 314.50) ☐ ABBREVIATED NEW DRUG APPLICATION (ANDA, 21 CFR 314.94)

☐

IF AN NDA, IDENTIFY THE APPROPRIATE TYPE ☐ 505 (b)(1) ☒ 505 (b)(2)

IF AN ANDA, OR 505(b)(2), IDENTIFY THE REFERENCE LISTED DRUG PRODUCT THAT IS THE BASIS FOR THE SUBMISSION

Name of Drug	Holder of Approved Application
Not applicable	Not applicable

TYPE OF SUBMISSION *(check one)* ☐ ORIGINAL APPLICATION ☒ AMENDMENT TO A PENDING APPLICATION ☐ RESUBMISSION

☐ PRESUBMISSION ☐ ANNUAL REPORT ☐ ESTABLISHMENT DESCRIPTION SUPPLEMENT ☐ EFFICACY SUPPLEMENT

☐ LABELING SUPPLEMENT ☐ CHEMISTRY MANUFACTURING AND CONTROLS SUPPLEMENT ☐ OTHER

IF A SUBMISSION OF PARTIAL APPLICATION, PROVIDE LETTER DATE OF AGREEMENT TO PARTIAL SUBMISSION:

IF A SUPPLEMENT, IDENTIFY THE APPROPRIATE CATEGORY ☐ CBE ☐ CBE-30 ☐ Prior Approval (PA)

REASON FOR SUBMISSION
Four Month Safety Update

PROPOSED MARKETING STATUS *(check one)* ☐ PRESCRIPTION PRODUCT (Rx) ☐ OVER THE COUNTER PRODUCT (OTC)

NUMBER OF VOLUMES SUBMITTED	THIS APPLICATION IS	PAPER	PAPER AND ELECTRONIC	ELECTRONIC
1		☒	☐	☐

ESTABLISHMENT INFORMATION (Full establishment information should be provided in the body of the application.)
Provide locations of all manufacturing, packaging and control sites for drug substance and drug product (continuation sheets may be used if necessary). Include name, address, contact, telephone number, registration number (CFN), DMF number, and manufacturing steps and/or type of testing (e.g. Final dosage form, Stability testing) conducted at the site. Please indicate whether the site is ready for inspection or, if not, when it will be ready.

Cross References (list related License Applications, INDs, NDAs, PMAs, 510(k)s, IDEs, BMFs, and DMFs referenced in the current application)

RECEIVED
SEP 26 2003
MEGA/CDER