CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

22-058

OTHER REVIEW(S)

CDRH Consult Review
NDA 22-058/Supprelin LA 50 mg (histrelin acetate subdermal implant) Insertion Device

Sponsor: Valera Pharmaceuticals
Intended Use: treatment of precocious puberty in children

Background: FDA approved Valera's histrelin subcutaneous implant (50mg) under proprietary name Vantas NDA 21-732 for palliative treatment of advanced prostate cancer. The only difference between Vantas and Supprelin LA is described as the new product releases drug at a higher rate than the Vantas product due to a [redacted] Please note 6/29/04 b(4)
and 8/19/04 consult reviews for the insertion device by V. Hibbard for NDA 21-732.
A sterile single-use insertion device is co-packaged for dedicated use with the implant. The insertion tool is comprised of a [redacted] b(4)
[redacted] The trocar [redacted] device is described as the same device approved for use with Valera's Vantas implant for the palliative treatment of prostate cancer in October 2004. Biocompatibility testing for the needle was also submitted in the NDA 21-732 amendment 2. The trocar/cannula device is listed (3.2.R.4 Medical device page 5) as the one used in the CPP Phase III Open-Label Study to Evaluate the Efficacy and Safety of the Histrelin Implants in Children with Central Precocious Puberty and is used commercially with the Vantas implant for the palliative treatment of prostate cancer (ND 21-732).
Sterilization is by [redacted] at exposure between [redacted] used to validate the sterilization process. Bacterial endotoxin testing by [redacted] b(4)

In 2006 Valera completed the active clinical portion of its Phase III study of Supprelin-LA, a 12-month implant for treating central precocious puberty (CPP), [redacted]. This multi-center, open-label study involved 36 patients who ranged in age from 4 to 11 years. Primary endpoints were hormonal suppression below pubertal levels and continued suppression upon challenge with gonadotropin-releasing hormone. Contacted D. Roman, M.D., CDER clinical reviewer, regarding Phase III clinical study. He noted there were some problems using the insertion device and some implants had to be manually inserted. There appears to be a learning curve with the insertion device.
Since final device/package labeling was not provided for review at this time, CDRH/ODE general labeling comments will be noted in this review recommendations.

Recommendations:
1. Please note that for a finished device, CDRH/ODE labeling includes the name of the device; needles should include the length and gauge, single use only, a notation regarding sterility and package integrity, and the prescription legend. This is in addition to the instructions for use. Since this is a kit, you may have this information included on the box or other labels as appropriate.

2. The problems noted in the Phase III clinical study with insertions may be related to labeling and user education associated with learning to use the insertion device. Labeling and user education may be a further consult review issue as labeling for the insertion device is finalized.

Yael Yaron 3/23/07
Ruth C. Chan for now 3/23/07

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

/s/

Jennifer Johnson
3/30/2007 12:13:35 PM
CSO
Entered into DFS on behalf of CDRH, Consult Review
signed on 23 March 2007

MEMORANDUM

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

DATE: April 20, 2007

TO: Mary Parks, M.D., Director
Division of Metabolic and Endocrine Products

VIA: Jennifer Johnson, Regulatory Project Manager
Division of Metabolic and Endocrine Products

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

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

SUBJECT: OSE/DSRCS Review of Patient Labeling for Supprelin LA (histrelin acetate) Subcutaneous Implant, NDA 22-068

Background and Summary

The sponsor submitted an NDA on June 30, 2006 Supprelin LA (histrelin acetate) Subcutaneous Implant, NDA 22-068, for the treatment of children with precocious puberty (CPP). Submitted labeling includes Full Prescribing Information (FPI) and patient labeling in the form of a Patient Package Insert (PPI).

OSE/DSRCS was consulted to review the revised patient information.

Comments and Recommendations

1. See the attached marked and clean copies of the PPI for our recommended revisions. We have made the patient information consistent with the FPI, simplified language where possible, and removed unnecessary information. Our revisions lowered the reading level from 8.9 to a 7.7 grade reading level (Flesch-Kincaid).

2. Refer to the FPI. Change the subheading for 17.4 from FDA-Approved Consumer Information to FDA- Approved Patient Labeling. We have already revised the heading in the PPI from "Consumer Information" to "Patient Information".

Comments to the review division are ***bolded, italicized, and underlined.*** Please call us if you have any questions.

6 Page(s) Withheld

_____ Trade Secret / Confidential (b4)

X Draft Labeling (b4)

_____ Draft Labeling (b5)

_____ Deliberative Process (b5)

Other Reviews 1

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

/s/

Jeanine Best
4/20/2007 08:20:00 AM
DRUG SAFETY OFFICE REVIEWER

Toni Piazza Hepp
4/20/2007 04:55:42 PM
DRUG SAFETY OFFICE REVIEWER