CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

22-386

RISK ASSESSMENT and RISK MITIGATION REVIEW(S)

Department of Health and Human Services
Public Health Service
Food and Drug Administration
Center for Drug Evaluation and Research
Office of Surveillance and Epidemiology

Date:	April 3, 2008
To:	Mary Parks, M.D., Director Division of Metabolic and Endocrine Drug Products (DMEP)
Thru:	Claudia Karwoski, Pharm.D., Acting Director Division of Risk Management (DRISK)
From:	OSE PrandiMet Risk Management Team Scientific Lead: Jeanine Best, MSN, RN, PNP, Senior Drug Risk Management Analyst, OSE-DRISK Cheryl Campbell, MS, Regulatory Project Manager, OSE-IO Mary Dempsey, Risk Management Coordinator. OSE-DRISK Felecia Duffy, RN, BSN, MSEd, Safety Evaluator, OSE-DMEDP Joslyn Swann, PharmD, MGA , Safety Evaluator, OSE-DAEA
Subject:	Review of Risk Management Plan
Drug Name(s):	PrandiMet (repaglinide and metformin HCL) Tablets
Application Type/Number:	NDA 22-232
Applicant/sponsor:	Novo Nordisk
OSE RCM #:	2007-2163

1 INTRODUCTION

This memorandum follows a request from the Division of Metabolic and Endocrine Products (DMEP) for the Office of Surveillance and Epidemiology (OSE) to review and comment on the PrandiMet (repaglinide and metformin HCL) Tablets Risk Management Plan (RMP) submitted to FDA by Novo Nordisk on August 15, 2007, as part of the original New Drug Application (NDA) 22-232.

PrandiMet is the fixed dose combination product of repaglinide (Prandin) and metformin HCL (Glucophage) and is submitted for the indication of an adjunct to diet and exercise to improve glycemic control in patients with type 2 diabetes mellitus where treatment with dual repaglinide and metformin therapy is appropriate. Novo Nordisk submitted two fixed-dose strengths: 1 mg repaglinide/500 metformin HCL (1/500) and 2 mg repaglinide/500 metformin HCL (2/500).

2 MATERIAL REVIEWED

- Risk Management Plan submitted with NDA 22-232, PrandiMet (repaglinide and metformin HCL) Tablets, dated August 15, 2007.

3 RESULTS OF REVIEW

3.1 SAFETY CONCERNS

The risks of repaglinide and metformin HCL are well delineated as both products have been marketed for more than 10 years. The major risks associated with repaglinide include hypoglycemia, abdominal pain, and nausea. The major risk associated with metformin HCL is lactic acidosis.

3.2 PROPOSED RISK MINIMIZATION ACTIVITIES

Novo Nordisk proposes routine risk minimization activities including labeling and routine pharmacovigilance. Labeling and routine pharmacovigilance are the current risk minimization activities for the approved individual products, repaglinide and metformin HCL.

4 CONCLUSIONS

The Sponsor's submission does not constitute a formal Risk Minimization Action Plan (RiskMAP). We agree with the Sponsor that routine risk minimization activities for PrandiMet are adequate at this time based on the currently identified and potential risks of the product. No additional safety concerns have been identified at this time by either OSE or DMEP that warrant consideration of a formal RiskMAP or additional risk minimization activities.

If DMEP identifies additional safety concerns that warrant risk minimization activities above labeling and routine pharmacovigilance, or a formal RiskMAP, please re-consult OSE/Division of Risk Management.

OSE/DMEDP (Division of Medication Error and Prevention) will provide a separate review encompassing the tradename review and potential medication errors.

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/s/

Jeanine Best
4/3/2008 07:25:54 AM
DRUG SAFETY OFFICE REVIEWER

Claudia Karwoski
4/4/2008 12:50:57 PM
DRUG SAFETY OFFICE REVIEWER