

**CENTER FOR DRUG EVALUATION AND RESEARCH**

**Approval Package for:**

***APPLICATION NUMBER:***

**204141Orig1s000**

***Trade Name:*** Topicort

***Generic Name:*** Desoximetasone (Topical Spray)

***Sponsor:*** Taro Pharmaceuticals

***Approval Date:*** April 11, 2012

***Indications:*** Topicort Topical Spray is a corticosteroid indicated for the treatment of plaque psoriasis in patient 18 years of age or older.

# CENTER FOR DRUG EVALUATION AND RESEARCH

## 204141Orig1s000

### CONTENTS

#### Reviews / Information Included in this NDA Review.

<b>Approval Letter</b>	<b>X</b>
<b>Other Action Letters</b>	
<b>Labeling</b>	<b>X</b>
<b>REMS</b>	
<b>Summary Review</b>	<b>X</b>
<b>Officer/Employee List</b>	<b>X</b>
<b>Office Director Memo</b>	
<b>Cross Discipline Team Leader Review</b>	<b>X</b>
<b>Medical Review(s)</b>	<b>X</b>
<b>Chemistry Review(s)</b>	<b>X</b>
<b>Environmental Assessment</b>	
<b>Pharmacology Review(s)</b>	<b>X</b>
<b>Statistical Review(s)</b>	<b>X</b>
<b>Microbiology Review(s)</b>	
<b>Clinical Pharmacology/Biopharmaceutics Review(s)</b>	<b>X</b>
<b>Other Reviews</b>	<b>X</b>
<b>Risk Assessment and Risk Mitigation Review(s)</b>	
<b>Proprietary Name Review(s)</b>	<b>X</b>
<b>Administrative/Correspondence Document(s)</b>	<b>X</b>



NDA 204141

**NDA APPROVAL**

Taro Pharmaceuticals USA, Inc.  
Attention: Kavita Srivastava  
Executive Director, Regulatory Affairs  
3 Skyline Drive  
Hawthorne, NY 10532

Dear Ms. Srivastava:

Please refer to your New Drug Application (NDA) dated June 11, 2012, received June 12, 2012, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for Topicort<sup>®</sup> (desoximetasone) Topical Spray, 0.25%.

We acknowledge receipt of your amendments dated June 21, July 13 and 20, August 3, September 10, 27 and 28, October 11, 17, 18 and 31, November 1, 7, 8, 16 and 26, December 19, 2012; January 3 and 17, February 11 and 22, March 15, 18 and 21, April 4 and 10, 2013.

This new drug application provides for the use of Topicort<sup>®</sup> (desoximetasone) Topical Spray, 0.25% for the treatment of plaque psoriasis in patients 18 years of age or older.

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

**CONTENT OF LABELING**

As soon as possible, but no later than 14 days from the date of this letter, submit the content of labeling [21 CFR 314.50(l)] in structured product labeling (SPL) format using the FDA automated drug registration and listing system (eLIST), as described at <http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm>. Content of labeling must be identical to the enclosed labeling (text for the package insert, text for the patient package insert, patient instructions for use). Information on submitting SPL files using eLIST may be found in the guidance for industry *SPL Standard for Content of Labeling Technical Qs and As*, available at <http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf>.

The SPL will be accessible via publicly available labeling repositories.

## **CARTON AND IMMEDIATE-CONTAINER LABELS**

Submit final printed carton and immediate-container labels that are identical to the enclosed carton and immediate-container labels submitted on February 22, 2013, as soon as they are available, but no more than 30 days after they are printed. Please submit these labels electronically according to the guidance for industry *Providing Regulatory Submissions in Electronic Format – Human Pharmaceutical Product Applications and Related Submissions Using the eCTD Specifications (June 2008)*. Alternatively, you may submit 12 paper copies, with 6 of the copies individually mounted on heavy-weight paper or similar material. For administrative purposes, designate this submission “**Final Printed Carton and Container Labels for approved NDA 204141.**” Approval of this submission by FDA is not required before the labeling is used.

Marketing the product(s) with FPL that is not identical to the approved labeling text may render the product misbranded and an unapproved new drug.

## **REQUIRED PEDIATRIC ASSESSMENTS**

Under the Pediatric Research Equity Act (PREA) (21 U.S.C. 355c), all applications for new active ingredients, new indications, new dosage forms, new dosing regimens, or new routes of administration are required to contain an assessment of the safety and effectiveness of the product for the claimed indication(s) in pediatric patients unless this requirement is waived, deferred, or inapplicable.

We are waiving the pediatric study requirement for ages 0 years to 1 year 11 months because there is evidence strongly suggesting that the drug product would be unsafe in this pediatric group.

We are deferring submission of your pediatric study for ages 2 years to 16 years 11 months for this application because this product is ready for approval for use in adults and the pediatric study has not been completed.

Your deferred pediatric study required by section 505B(a) of the Federal Food, Drug, and Cosmetic Act is a required postmarketing study. The status of this postmarketing study must be reported annually according to 21 CFR 314.81 and section 505B(a)(3)(B) of the Federal Food, Drug, and Cosmetic Act. This required study is listed below.

- 2029-1      Conduct a trial in 100 evaluable pediatric patients with plaque psoriasis ages 2 to 16 years and 11 months. Evaluate the safety and effect of Topicort (desoximetasone) Topical Spray, 0.25% on the hypothalamic-pituitary-adrenal axis and pharmacokinetics of desoximetasone under maximal use conditions after 4 weeks of treatment. Conduct the trial in sequential cohorts, for example:

Cohort 1: age 12 years to 16 years 11 months  
Cohort 2: age 6 years -11 years and 11 month  
Cohort 3: age 2 years to 5 years and 11 months

Final Protocol Submission: 04/2014  
Study/Trial Completion: 04/2016  
Final Report Submission: 04/2017

Submit the protocol(s) to your IND 101789, with a cross-reference letter to this NDA.

Reports of this required pediatric postmarketing study must be submitted as a new drug application (NDA) or as a supplement to your approved NDA with the proposed labeling changes you believe are warranted based on the data derived from these studies. When submitting the reports, please clearly mark your submission "**SUBMISSION OF REQUIRED PEDIATRIC ASSESSMENTS**" in large font, bolded type at the beginning of the cover letter of the submission.

### **POSTMARKETING REQUIREMENTS UNDER 505(o)**

Section 505(o)(3) of the Federal Food, Drug, and Cosmetic Act (FDCA) authorizes FDA to require holders of approved drug and biological product applications to conduct postmarketing studies and clinical trials for certain purposes, if FDA makes certain findings required by the statute.

We have determined that an analysis of spontaneous postmarketing adverse events reported under subsection 505(k)(1) of the FDCA will not be sufficient to identify an unexpected serious risk of carcinogenesis.

Furthermore, the new pharmacovigilance system that FDA is required to establish under section 505(k)(3) of the FDCA will not be sufficient to assess this serious risk.

Therefore, based on appropriate scientific data, FDA has determined that you are required to conduct the following:

2029-2 A two year dermal rat carcinogenicity study.

The timetable you submitted on February 11, 2013, states that you will conduct this study according to the following schedule:

Final Protocol Submission: 04/2015  
Study Completion: 05/2017  
Final Report Submission: 05/2018

Submit the protocol(s) to your IND 101789, with a cross-reference letter to this NDA. Submit all final report(s) to your NDA. Prominently identify the submission with the following wording in bold capital letters at the top of the first page of the submission, as appropriate: "**Required Postmarketing Protocol Under 505(o)**", "**Required Postmarketing Final Report Under 505(o)**", "**Required Postmarketing Correspondence Under 505(o)**".

Section 505(o)(3)(E)(ii) of the FDCA requires you to report periodically on the status of any study or clinical trial required under this section. This section also requires you to periodically report to FDA on the status of any study or clinical trial otherwise undertaken to investigate a safety issue. Section 506B of the FDCA, as well as 21 CFR 314.81(b)(2)(vii) requires you to report annually on the status of any postmarketing commitments or required studies or clinical trials.

FDA will consider the submission of your annual report under section 506B and 21 CFR 314.81(b)(2)(vii) to satisfy the periodic reporting requirement under section 505(o)(3)(E)(ii) provided that you include the elements listed in 505(o) and 21 CFR 314.81(b)(2)(vii). We remind you that to comply with 505(o), your annual report must also include a report on the status of any study or clinical trial otherwise undertaken to investigate a safety issue. Failure to submit an annual report for studies or clinical trials required under 505(o) on the date required will be considered a violation of FDCA section 505(o)(3)(E)(ii) and could result in enforcement action.

### **PROMOTIONAL MATERIALS**

You may request advisory comments on proposed introductory advertising and promotional labeling. To do so, submit, in triplicate, a cover letter requesting advisory comments, the proposed materials in draft or mock-up form with annotated references, and the package insert to:

Food and Drug Administration  
Center for Drug Evaluation and Research  
Office of Prescription Drug Promotion  
5901-B Ammendale Road  
Beltsville, MD 20705-1266

As required under 21 CFR 314.81(b)(3)(i), you must submit final promotional materials, and the package insert, at the time of initial dissemination or publication, accompanied by a Form FDA 2253. For instruction on completing the Form FDA 2253, see page 2 of the Form. For more information about submission of promotional materials to the Office of Prescription Drug Promotion (OPDP), see <http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm>.

### **REPORTING REQUIREMENTS**

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, call Paul Phillips, Regulatory Project Manager, at (301) 796-3935.

Sincerely,

*{See appended electronic signature page}*

Tatiana Oussova, MD, MPH  
Deputy Director for Safety  
Division of Dermatology and Dental Products  
Office of Drug Evaluation III  
Center for Drug Evaluation and Research

Enclosures:

Content of Labeling  
Carton and Container Labeling

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**This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.**  
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/s/  
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TATIANA OUSSOVA  
04/11/2013