CENTER FOR DRUG EVALUATION AND RESEARCH

Approval Package for:

APPLICATION NUMBER:

205175Orig1s000

Trade Name:	Ecoza topical foam, 1%.
Generic Name:	econazole nitrate
Sponsor:	AmDerma Pharmaceuticals, LLC.
Approval Date:	October 24, 2013
Indications:	Treatment of interdigital tinea pedis caused by *Trichophyton rubrum*, *Trichophyton mentagrophytes*, and *Epidermophyton floccosum* in patients 12 years of age and older..

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APPLICATION NUMBER:

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APPROVAL LETTER

DEPARTMENT OF HEALTH AND HUMAN SERVICES

Food and Drug Administration
Silver Spring MD 20993

NDA 205175

NDA APPROVAL

AmDerma Pharmaceuticals, LLC
Attention: Candis Edwards
Regulatory Agent
440 U.S. Highway 22 East, Suite 104
Bridgewater, NJ 08807

Dear Ms. Edwards:

Please refer to your New Drug Application (NDA) dated December 21, 2012, received December 26, 2012, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Ecoza (econazole nitrate) topical foam, 1%.

We acknowledge receipt of your amendments dated January 24 and 29, February 7, 11, 14, 15 (2) and 21, March 15 and 22, April 4, May 2, June 21 (2), July 19, August 30, September 12, 19, 20 and 26, October 2, 4 and 11, 2013.

This new drug application provides for the use of Ecoza (econazole nitrate) topical foam, 1% for the treatment of interdigital tinea pedis caused by *Trichophyton rubrum*, *Trichophyton mentagrophytes*, and *Epidermophyton floccosum* in patients 12 years of age and 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 and with the minor editorial revisions listed below.

- In section 14 of the Prescribing Information, change the last three sentences of the first paragraph to "The study population ranged in age from 12 to 71 years with 5 subjects less than 18 years of age at baseline. The subjects were 71% male and 51% Caucasian. Table 1 presents the efficacy results for each trial."
- In the Patient Labeling Instructions For Use, replace Figure A with a picture of the to-be-marketed container closure system.
- On the carton and immediate container labels, remove the statement "and other pending patents".

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, except with the revisions listed, the enclosed labeling (text for the package insert, text for the patient package insert). 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 **and** carton and immediate container labels submitted on September 20, 2013, except with the revisions listed above, 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 205175**." 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 birth to 11 years 11 months of age because necessary studies are impossible or highly impracticable. This is because the prevalence of tinea pedis in pediatric subjects less than 12 years of age is low.

We note that you have fulfilled the pediatric study requirement for ages 12 to 17 years for this application.

POSTMARKETING REQUIREMENTS UNDER 505(o)

Section 505(o)(3) of the 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 drug interactions between topical econazole nitrate and anticoagulant therapy with coumarins (warfarin and acenocoumarol).

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:

2087-1 Conduct in-vitro assessments to evaluate the following:

1. Inhibition potential of econazole nitrate for enzymes CYP1A2, 2B6, 2C8, 2C9, 2C19, 2D6 and 3A4.

2. Induction potential of econazole nitrate for enzymes CYP1A2, 2B6 and 3A.

Further in-vivo assessment to address drug interaction potential may be needed based on the results of the in-vitro assessment.

The timetable you submitted on October 2, 2013, states that you will conduct this study according to the following schedule:

Final Protocol Submission:	11/13
Study Initiation:	05/14
Final Report Submission:	10/14

Submit the protocol(s) to your IND 077523, 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 Matthew White, Regulatory Project Manager, at (301) 796-4997.

Sincerely,

{See appended electronic signature page}

Susan J. Walker, MD, FAAD
Director
Division of Dermatology and Dental Products
Office of Drug Evaluation III
Center for Drug Evaluation and Research

Enclosure(s):
Content of Labeling
Carton and Container Labeling

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

/s/

SUSAN J WALKER
10/24/2013