

**CENTER FOR DRUG EVALUATION AND RESEARCH**

**Approval Package for:**

***APPLICATION NUMBER:***

**204326Orig1s000**

***Trade Name:*** ADZENYS XR-ODT

***Generic Name:*** amphetamine extended-release orally disintegrating tablets

***Sponsor:*** Neos Therapeutics, Inc.

***Approval Date:*** January 27, 2016

***Indications:*** ADZENYS XR-ODT is a central nervous system (CNS) stimulant indicated for the treatment of Attention Deficit Hyperactivity Disorder (ADHD) in patients 6 years and older.

# CENTER FOR DRUG EVALUATION AND RESEARCH

**204326Orig1s000**

## CONTENTS

|                                                           |
|-----------------------------------------------------------|
| <b>Reviews / Information Included in this NDA Review.</b> |
|-----------------------------------------------------------|

|                                                         |          |
|---------------------------------------------------------|----------|
| <b>Approval Letter</b>                                  | <b>X</b> |
| <b>Other Action Letters</b>                             | <b>X</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>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>Microbiology / Virology 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> |

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**APPROVAL LETTER**



NDA 204326

**NDA APPROVAL**

Neos Therapeutics, Inc.  
Attention: Dorothy Engelking, MS, RAC  
Vice President, Regulatory Affairs  
2940 N. Highway 360, Suite 400  
Grand Prairie, TX 75050

Dear Ms. Engelking:

Please refer to your New Drug Application (NDA) dated December 27, 2012, received December 28, 2012, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act (FDCA) for ADZENYS XR-ODT (amphetamine Extended-Release Orally Disintegrating Tablets) 3.1 mg, 6.3 mg, 9.4 mg, 12.5 mg, 15.7 mg, and 18.8 mg.

We acknowledge receipt of your amendment dated and received, July 27, 2015, which constituted a complete response to our September 24, 2013, action letter.

This new drug application provides for the use ADZENYS XR-ODT (amphetamine Extended-Release Orally Disintegrating Tablets) 3.1 mg, 6.3 mg, 9.4 mg, 12.5 mg, 15.7 mg, and 18.8 mg for Attention Deficit Hyperactivity Disorder (ADHD).

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.

**WAIVER OF HIGHLIGHTS SECTION**

We are waiving the requirements of 21 CFR 201.57(d)(8) regarding the length of Highlights of prescribing information. This waiver applies to all future supplements containing revised labeling unless we notify you otherwise.

**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, and Medication

Guide). 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 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 204326.**” Approval of this submission by FDA is not required before the labeling is used.

Marketing the products 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 in pediatric patients unless this requirement is waived, deferred, or inapplicable.

We are waiving the pediatric study requirements for ages 0 to 3 years because necessary studies are impossible or highly impracticable. This is because the diagnostic criteria and assessment measures for determining efficacy for the treatment of ADHD in children less than 4 years old are not well defined, and pharmaceutical treatment in this age group is uncommon.

We are deferring submission of your pediatric studies for ages 4 to 5 years for this application because pediatric studies should be delayed until additional safety or effectiveness data have been collected. At the current time, FDA has limited experience with the study of ADHD in younger children (4 to less than 6 years old), so we will defer studies in this younger age group for drugs seeking a claim in ADHD.

Your deferred pediatric studies required by section 505B(a) of the FDCA are required postmarketing studies. The status of these postmarketing studies must be reported annually according to 21 CFR 314.81 and section 505B(a)(3)(B) of the FDCA. These required studies are listed below.

3029-1      A single-dose, open-label, randomized pharmacokinetic study of ADZENYS XR-ODT (amphetamine extended-release orally disintegrating tablets), in male and female children (4 to less than 6 years of age) with ADHD.

Final Protocol Submission:    January 2017  
Study Completion:                May 2018  
Final Report Submission:       November 2018

3029-2      A randomized, double-blind, placebo-controlled, flexible-dose titration study of ADZENYS XR-ODT (amphetamine extended-release orally disintegrating tablets), in children ages 4 to 5 years diagnosed with ADHD.

Final Protocol Submission:    January 2017  
Study Completion:                December 2019  
Final Report Submission:       June 2020

3029-3      A one year Pediatric Open-Label Safety Study of patients age 4 to 5 years (at the time of entry into PMR 3029-1 or PMR 3029-2, or at the time of enrollment if directly enrolled into PMR 3029-3) diagnosed with ADHD treated with ADZENYS XR-ODT (amphetamine extended-release orally disintegrating tablets).

Final Protocol Submission:    January 2017  
Study Completion:                May 2020  
Report Submission:               November 2020

Submit the protocols to your **IND 112991**, with a cross-reference letter to this NDA.

Reports of these required pediatric postmarketing studies 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.

This product is appropriately labeled for use in ages 6 to 17 years for this indication. Therefore, no additional studies are needed in this pediatric group.

### **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, Medication Guide, and patient PI (as applicable) to:

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

Alternatively, you may submit a request for advisory comments electronically in eCTD format. For more information about submitting promotional materials in eCTD format, see the draft Guidance for Industry (available at: <http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM443702.pdf> ).

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. Form FDA 2253 is available at

<http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083570.pdf>.

Information and Instructions for completing the form can be found at

<http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf>. 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, contact CDR Kofi Ansah, Pharm.D., Senior Regulatory Project Manager, at (301)796-4158 or email: [Kofi.Ansah@fda.hhs.gov](mailto:Kofi.Ansah@fda.hhs.gov).

Sincerely,

*{See appended electronic signature page}*

Mitchell V. Mathis, M.D.  
Director  
Division of Psychiatry Products  
Office of Drug Evaluation I  
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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MITCHELL V Mathis  
01/27/2016