

CENTER FOR DRUG EVALUATION AND RESEARCH

Approval Package for:

APPLICATION NUMBER:

211843Orig1s000

Trade Name: Thiola EC delayed-release tablets, 100 mg and 300 mg

Generic or Proper Name: tiopronin

Sponsor: Mission Pharmacal Company

Approval Date: June 28, 2019

Indication: THIOLA EC is indicated, in combination with high fluid intake, alkali, and diet modification, for the prevention of cystine stone formation in adults and pediatric patients 20 kg and greater with severe homozygous cystinuria, who are not responsive to these measures alone.

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APPROVAL LETTER



NDA 211843

NDA APPROVAL

Mission Pharmacal Company
c/o Hurley Consulting Associates Ltd.
Attention: John C. Talian, PhD
Vice President, Regulatory Affairs
25 DeForest Avenue
Summit, NJ 07901

Dear Dr. Talian:

Please refer to your new drug application (NDA) dated and received August 31, 2018, and your amendments, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Thiola EC (tiopronin) delayed-release tablets, 100 mg and 300 mg.

This new drug application provides for the use of Thiola EC (tiopronin) delayed-release tablets in combination with high fluid intake, alkali, and diet modification, for the prevention of cystine stone formation in adults and pediatric patients 20 kg and greater with severe homozygous cystinuria, who are not responsive to these measures alone.

APPROVAL & LABELING

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.

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 FDA.gov.¹ Content of labeling must be identical to the enclosed labeling (text for the Prescribing Information) as well as annual reportable changes not included in the enclosed labeling. 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*.²

The SPL will be accessible via publicly available labeling repositories.

¹ <http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm>

² We update guidances periodically. For the most recent version of a guidance, check the FDA Guidance Documents Database <https://www.fda.gov/RegulatoryInformation/Guidances/default.htm>.

CARTON AND CONTAINER LABELING

Submit final printed carton and container labeling that are identical to the enclosed carton and container labeling, as soon as they are available, but no more than 30 days after they are printed. Please submit these labeling electronically according to the guidance for industry *Providing Regulatory Submissions in Electronic Format — Certain Human Pharmaceutical Product Applications and Related Submissions Using the eCTD Specifications*. For administrative purposes, designate this submission “**Final Printed Carton and Container Labeling for approved NDA 211843.**” Approval of this submission by FDA is not required before the labeling is used.

REQUIRED PEDIATRIC ASSESSMENTS

Under the Pediatric Research Equity Act (PREA) (21 U.S.C. 355c), all applications for new active ingredients (which includes new salts and new fixed combinations), 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.

Because this drug product for this indication has an orphan drug designation, you are exempt from this requirement.

POSTMARKETING COMMITMENTS SUBJECT TO REPORTING REQUIREMENTS UNDER SECTION 506B

We remind you of your postmarketing commitments:

- 3633-1 Conduct a randomized, two-way, crossover, single oral dose study to evaluate the relative bioavailability of 300 mg of Thiola EC crushed, mixed in apple sauce compared to 300 mg Thiola EC intact tablet in healthy subjects to support providing dosing instructions to pediatric patients weighing less than 20 kg or who cannot swallow the tablet whole

Final Protocol Submission: 08 / 2019

Study/Trial Completion: 02 / 2020

Final Report Submission: 05 / 2020

- 3633-2 Criteria need to be set for (b) (4) product release and stability specifications:

- Provide (b) (4) testing results for eight development registration batches and six validation batches. Specifically, the eight development/registration batches are to be tested after ~24 months storage under long-term conditions. The six validation batches to be manufactured in June 2019 need to be tested

approximately one week after manufacturing, as part of release testing. Submit these data as an amendment to the NDA according to the timetable below.

Study Completion: December 31, 2019

PAS Submission: March 31, 2020

Submit clinical protocols to your IND 135653 for this product. Submit nonclinical and chemistry, manufacturing, and controls protocols and all postmarketing final reports to this NDA. In addition, under 21 CFR 314.81(b)(2)(vii) and 314.81(b)(2)(viii) you should include a status summary of each commitment in your annual report to this NDA. The status summary should include expected summary completion and final report submission dates, any changes in plans since the last annual report, and, for clinical studies/trials, number of patients entered into each study/trial. All submissions, including supplements, relating to these postmarketing commitments should be prominently labeled **“Postmarketing Commitment Protocol,” “Postmarketing Commitment Final Report,” or “Postmarketing Commitment Correspondence.”**

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 Prescribing Information, Medication Guide, and Patient Package Insert (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 *Providing Regulatory Submissions in Electronic and Non-Electronic Format—Promotional Labeling and Advertising Materials for Human Prescription Drugs*.³

As required under 21 CFR 314.81(b)(3)(i), you must submit final promotional materials, and the Prescribing Information, at the time of initial dissemination or publication,

³ When final, this guidance will represent the FDA's current thinking on this topic. For the most recent version of a guidance, check the FDA guidance web page at <https://www.fda.gov/RegulatoryInformation/Guidances/default.htm>.

accompanied by a Form FDA 2253. Form FDA 2253 is available at FDA.gov.⁴ Information and Instructions for completing the form can be found at FDA.gov.⁵ For more information about submission of promotional materials to the Office of Prescription Drug Promotion (OPDP), see FDA.gov.⁶

REPORTING REQUIREMENTS

We remind you that you must comply with reporting requirements for an approved NDA (21 CFR 314.80 and 314.81).

We request that for a period of 5 years from the U.S. approval date, you provide detailed analyses of events of blood disorders and hepatic adverse events reported from clinical study and post-marketing reports in your periodic safety report (i.e., the Periodic Adverse Drug Experience Report [PADER] required under 21 CFR 314.80(c)(2) or the ICH E2C Periodic Benefit-Risk Evaluation Report [PBRER] format). These analyses should show cumulative data relative to the date of approval of Thiola EC (tiopronin) delayed-release tablets, as well as relative to prior periodic safety reports. Medical literature reviews for case reports/case series of blood disorders and hepatic adverse events reported with Thiola EC (tiopronin) delayed-release tablets should also be provided in the periodic safety report.

If you have any questions, please contact Sabry Soukehal, Senior Regulatory Health Project Manager, at (240) 402 6187.

Sincerely,

{See appended electronic signature page}

Norman Stockbridge, MD, PhD
Director
Division of Cardiovascular and Renal Products
Office of Drug Evaluation I
Center for Drug Evaluation and Research

ENCLOSURE(S):

- Content of Labeling
- Carton and Container Labeling

⁴ <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083570.pdf>

⁵ <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf>

⁶ <http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm>

This is a representation of an electronic record that was signed electronically. Following this are manifestations of any and all electronic signatures for this electronic record.

/s/

NORMAN L STOCKBRIDGE
06/28/2019 03:03:08 PM