	NDA 207561/306 (S-14)
NDA/SDN	NDA 208215/171 (S-5)
Submission Type	Efficacy supplement
Applicant Name	Gilead
Submission Dates	04/03/2017 04/11/2017
Generic Name	Elvitegravir (EVG), Cobicistat (COBI), Emtricitabine (FTC), and Tenofovir Alafenamide (TAF) (E/C/F/TAF) FTC and TAF
Dosage Form (Strength)	Tablet (150/150/200/10 mg) Tablet (200/25 mg)
Indication	Treatment of HIV-1 infection in adults and pediatric patients 6 to <12 years of age and older weighing at least 25 kg
Review Team	Mario Sampson, PharmD, Islam R. Younis, PhD

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2 Background

This efficacy supplement contains data from Cohort 2 Part A of pediatric PK, safety, and antiviral activity (week 24) study 292-0106, in which subjects aged 6 - <12 years and weighing \geq 25 kg were administered E/C/F/TAF. Based on this study, the applicant is seeking an E/C/F/TAF indication for patients weighing \geq 25 kg. The proposed F/TAF indication is patients weighing \geq 35 kg in combination with other antiretrovirals (ARV) and for patients weighing \geq 25 - <35 kg in combination with ARVs other than protease inhibitors that require a CYP3A inhibitor. In addition, the applicant proposes to use this study to partially fulfill PMR 3041-1, which requested a PK, safety, and antiviral activity study of F/TAF in subjects aged 6 - <12 years.

3 Summary of clinical pharmacology findings

The Office of Study Integrity and Surveillance recommended accepting the PK data without onsite inspection (NDA 208215 memorandum dated 7/13/2017). We found study conduct and bioanalytical methods to be acceptable. Compared to historical adult data, exposures of the

components of E/C/F/TAF were generally higher in pediatric subjects relative to adults, with mean ratios and upper 90% CIs generally less than two (Figure 1Figure 2). Exceptions where exposures were similar between pediatric and adult subjects included EVG and COBI Cmin (CI includes one). Exceptions where the upper 90% CI was between two and three included COBI Cmin and TAF Cmax. Increased exposures of EVG, COBI, FTC, and TAF in ages 6-<12 versus adults were acceptable as there are no exposure-related safety concerns associated with these components. While TFV has exposure-related safety concerns, exposures in ages 6-<12 years administered E/C/F/TAF are much lower compared to adults administered TDF.



Figure 1. Comparison of exposures of the components of E/C/F/TAF in HIV-infected pediatric (n=23) and adult (n=19) subjects.

Source: plotted by reviewer from data in CSR section 10.

4 Recommendations

The application is recommended for approval from a clinical pharmacology perspective.

5 Labeling recommendations

Labeling	Section	Issue	Description	
F/TAF	7.1	TAF as a	As previously communicated to the applicant under	
		substrate of	NDA 208351 S-2 S-3, we believe the results of in	
		OATP	vitro study 120-2022 suggests that OATP	
			contributes to the disposition of TAF. We edited	
			labeling to state that TAF is a substrate of OATP1B1	
			and OATP1B3. The applicant accepted our edits.	
F/TAF and	12.3	Pediatric PK	We requested the applicant add pediatric PK	
E/C/F/TAF		parameters	parameters for ages 6-<12 and 12-<18 years. The	
			applicant added the PK parameter tables.	

Table 1. Summary of clinical-pharmacology related labeling changes.

6 Review of E/C/F/TAF pediatric study GS-US-292-0106

Note: this interim study report contains the week 4 PK and week 24 safety data. The study is ongoing with the last visit being week 48.

Study #	GS-US-292-0106	Study Period	5/6/13 - 4/20/16	
Title	A Phase 2/3, Open-Label Study of the Pharmacokinetics, Safety, and Antiviral			
	Activity of the Elvitegravir/Cobicistat/Emtricitabine/Tenofovir Alafenamide			
	(E/C/F/TAF) Single Tablet Regimen (STR) in HIV-1 Infected Antiretroviral			
	Treatment-Naive Adolescents and Virologically Suppressed Children			
Link to	\\cdsesub1\evsprod\nda207561\0113\m5\53-clin-stud-rep\535-rep-effic-safety-			
study	stud\hiv\5352-stud-rep-uncontr\gs-us-292-0106\report-body.pdf			
report				

STUDY SUMMARY (As Reported by the Applicant) OBJECTIVES, RATIONALE, TRIAL DESIGN AND PK ASSESSMENTS

Objectives:

-Primary: PK of EVG and TAF, safety (week 24)

-Secondary: PK of COBI, FTC, and TFV, antiviral activity, safety (week 48)

A no effect boundary of 70-143% was used for comparison of adult and pediatric PK parameters. *Rationale:* This study was done to determine if administration of the adult dose of E/C/F/TAF to children aged 6 - <12 years and weighing \geq 25 kg results in sufficiently comparable exposures as compared to adults

Study design:

Ongoing, open-label, multicenter, multicohort, single-group study



E/C/F/TAF and F/TAF pediatric efficacy supplement

Protocol Deviations

Three important protocol deviations were reported; baseline DEXA scan not performed entirely, baseline DEXA scan performed after initial dose of study drug, and baseline labs received at the lab beyond the duration of stability.

Concomitant medications

There was no reported use of prohibited concomitant medications during the study.

Bioanalytical Methods

Study drug concentrations in plasma (EVG, TAF, TFV, COBI, and FTC) and PBMCs (TFV-DP) were reported to have been determined using validated bioanalytical methods (see section 7.1).

Results

Pharmacokinetics

Pediatric exposures of the components of E/C/F/TAF were compared to historical adult data. Historical adult PK data for EVG, COBI, and FTC were from the intensive PK substudy of phase 2 E/C/F/TAF study 292-0102 (n=19). Historical adult PK data for TAF and TFV were from the population PK analysis of phase 3 E/C/F/TAF studies 292-0104 and 292-0111 (n=539 for TAF and n=841 for TFV). The no effect boundary selected by the applicant for the ratio of pediatric to adult PK parameters was 70-143%. Exposures of the components of E/C/F/TAF were generally higher in pediatric subjects relative to adults, with mean ratios and upper 90% CIs generally less than two (Figure 2). Exceptions where exposures were similar between pediatric and adult subjects included EVG and COBI Cmin (CI includes one). Exceptions where the upper 90% CI was between two and three included COBI Cmin and TAF Cmax.





CD4 counts

CD4 counts were found to decrease from baseline during the study in subjects aged 6 - <12 years (Table 3). We did not find the change from baseline in CD4 count to be associated with EVG, COBI, FTC, TAF, or TFV AUC. See the Clinical review for the complete discussion of this issue.

Table 3. Mean change in CD4+ count and percentage from baseline to week 24 in virologically suppressed pediatric patients from 6 to <12 years who switched to E/C/F/TAF.

	Week 2	Week 4	Week 12	Week 24
Mean Change in CD4+ Cell Count	-162	-125	-162	-150
(cells/mm ³)				
Mean Change in CD4%	+0.5%	-0.1%	-0.8%	-1.5%

Source: NDA 207561 FDA labeling edits dated 8/18/2017.

Efficacy

Twenty three subjects (100%) had HIV RNA <50 copies/mL at week 24.

Safety

Among the 23 subjects in the safety population (week 24 visit), there were no discontinuations due to AEs, SAEs, or deaths.

REVIEWER ASSESSMENT			
The study design is acceptable \square Yes \square No			
Study Conduct			
 Protocol deviations do not affect the integrity of the study 	🗹 Yes 🗆 No 🗆 N/A		
 Use of prohibited concomitant medications did not affect the 	🗹 Yes 🗆 No 🗆 N/A		
integrity of the study			
 Bioanalytical method performance in acceptable 	🗹 Yes 🗆 No		
Study Results			
The study results are acceptable as reported by the sponsor \square Yes \square	No		
Discussion			
In the bioanalysis of study samples, analyte peaks were observed in cl	romatogram blanks for		
EVG and COBI, and several samples were reassayed due to carryover	. We requested the		
applicant provide information on how carryover was assessed. In the	esponse, the applicant		
stated that carryover was assessed in each run by placing an extracted	matrix blank after each of		
the two ULOQ standards. If the blank had a peak area >20% of the LI	LOQ peak area, a		
carryover factor was calculated. This factor was then applied to all sar	nples in the run. If the		
calculated carryover value for the preceding sample to the subsequent sample was $>5\%$, the			
affected sample would be re-run (NDA 207561 SDN 344). We consider carryover to have been			
sufficiently addressed.			
Increased experience of EVC CODI ETC and TAE in acces (<12 year	ana adulta wara		
increased exposures of EVO, COBI, FTO, and TAF in ages 0-<12 versus adults were			
acceptable as there are no exposure-related safety concerns associated with these components.			

While TFV has exposure-related safety concerns, exposures in ages 6-12 years administered E/C/F/TAF are much lower compared to adults administered TDF.

7 Appendix

7.1 Bioanalytical methods

We previously reviewed the method validation reports (NDA 207561) for assays used in this study and found the methods to be acceptable. Study sample analyses were also acceptable.

Analyte	Report	Link
	type	
TAF	Method	(b) (4)
	validation	
	Sample	
	analysis	
TFV	Method	
	validation	
		+
	Sample	
	analysis	
FTC	Method	
	validation	
		+
	Sample	
	analysis	
EVG	Method	
and	validation	
COBI	Sample	
	analysis	
TFV-	Method	
DP	validation	
	Sample	
	analysis	

Table 4. Links to method validation and sample analysis reports.

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/s/

MARIO SAMPSON 09/08/2017

ISLAM R YOUNIS 09/11/2017