CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER: 22-350

MEDICAL REVIEW(S)



CLINICAL REVIEW

Application Type NDA Submission Number 22,350 Submission Code N000

Letter Date June 30, 2009 Stamp Date June 30, 2009 PDUFA Goal Date July 30, 2009

Reviewer Name Naomi Lowy, MD Review Completion Date May 14, 2009

Established Name Saxagliptin (Proposed) Trade Name Onglyza

Therapeutic Class Dipeptidyl-peptidase IV inhibitor Applicant Bristol-Myers Squibb Company

Priority Designation S

Formulation Oral tablet Dosing Regimen 5 mg daily

2.5 mg daily (moderate, severe, or

end-stage renal impairment)

Indication Treatment of type 2 diabetes

Intended Population Adults



TABLE OF CONTENTS

1	RECO	OMMENDATIONS/RISK BENEFIT ASSESSMENT	4		
		Recommendation on Regulatory Action			
	1.2	Risk Benefit Assessment	4		
	1.3	Recommendations for Postmarketing Risk Management Activities	4		
	1.4	Recommendations for other Post Marketing Study Commitments	0		
•					
2	INTR	ODUCTION AND REGULATORY BACKGROUND	6		
	2.1	Product Information	6		
	2.2	Tables of Currently Available Treatments for Proposed Indications	8		
	2.3	Availability of Proposed Active Ingredient in the United States	10		
	2.4	Important Safety Issues With Consideration to Related Drugs	10		
	2.5	Summary of Presubmission Regulatory Activity Related to Submission	10		
	2.6	Other Relevant Background Information	13		
3	ETHI	CS AND GOOD CLINICAL PRACTICES	14		
		Submission Quality and Integrity			
		Compliance with Good Clinical Practices	14		
	3.3 I	Financial Disclosures	14		
4					
4		SIGNIFICANT EFFICACY/SAFETY ISSUES RELATED TO OTHER REVIEW DISCIPLINES21			
	4.1	Chemistry Manufacturing and Controls	21		
	4.2	Clinical Microbiology	22		
	4.3 F	Preclinical Pharmacology/Toxicology	22		
	4.4.1	Clinical Pharmacology	22		
	4.4.1	Mechanism of Action	23		
	4.4.3	Pharmacodynamics	23		
5		Pharmacokinetics			
3	SOUR	CES OF CLINICAL DATA	33		
	5.1 T	Tables of Clinical Studies	34		
	3.2 . F	Review Strategy	40		
		Discussion of Individual Studies			
6	REVII	EW OF EFFICACY	56		
		ndication			
	0.1.1	Methods	60		
	6.1.2	Demographics	60		
	6.1.3	Patient Disposition	74		
	6.1.4	Analysis of Primary Endpoint(s)	78		
	6.1.5	Analysis of Secondary Endpoints(s)	87		
	6.1.6	Other Endpoints	100		
	6.1.7	Subpopulations	100		
	6.1.8 6.1.9	Analysis of Clinical Information Relevant to Dosing Recommendations	104		
	6.1.9	Discussion of Persistence of Efficacy and/or Tolerance Effects	106		
_		Additional Efficacy Issues/Analyses			
7		EW OF SAFETY			
	7.1 N	Aethods	108		
	/.1.1	Clinical Studies Used to Evaluate Safety	108		
	7.1.2	Adequacy of Data	110		
	7.1.3	Pooling Data Across Studies to Estimate and Compare Incidence	110		



	7.2 Adequacy of Safety Assessments	112
	7.2.1 Overall Exposure at Appropriate Doses/Durations and Demographics of Target Populations	117
	7.2.2 Explorations for Dose Response	113
	7.2.3 Special Animal and/or In Vitro Testing	115
	7.2.4 Routine Clinical Testing	115
	7.2.5 Metabolic, Clearance, and Interaction Workup	115
	7.2.6 Evaluation for Potential Adverse Events for Similar Drugs in Drug Class	115
	7.3 Major Safety Results	116
	7.3.1 Deaths	116
	7.3.2 Nonitatal Serious Adverse Events	122
	7.3.3 Dropouts and/or Discontinuations	138
	7.3.4 Significant Adverse Events	157
	7.3.5 Submission Specific Primary Safety Concerns	157
	7.4 Supportive Safety Results	23/
	7.4.1 Common Adverse Events	23/
	7.4.2 Laboratory Findings	248
	7.4.2 Vital Signs	280
	7.4.3 Electrocardiograms (ECGs)	292
	7.4.4 Special Safety Studies	293
	7.4.5 Immunogenicity	293
	7.5 Other Safety Explorations	. 503
	Dose Dependency for Adverse Events	203
	7.5.1 Time Dependency for Adverse Events	203
	7.5.2 Drug-Demographic Interactions	204
	7.5.3 Drug-Disease Interactions	297
	7.5.4 Drug-Drug Interactions	297
	7.6 Additional Safety Explorations	297
	7.6.1 Human Carcinogenicity	297
	7.6.2 Human Reproduction and Pregnancy Data	208
	7.6.3 Pediatrics and Effect on Growth	299
	7.6.4 Overdose, Drug Abuse Potential, Withdrawal and Rebound	200
	7.7 Additional Submissions	299
8	POSTMARKETING EXPERIENCE	299
9	APPENDICES	300
	9.1 Literature Review/References	
	9.2 Labeling Recommendations	205
	9.3 Advisory Committee Meeting	205

1 Recommendations/Risk Benefit Assessment

Saxagliptin (ONGLYZATM) is an orally-active, reversible dipeptidyl peptidase 4 (DPP4) inhibitor that has been developed as an adjunct to diet and exercise to improve glycemic control in adults with type 2 diabetes. The Sponsor is seeking three indications: as monotherapy, in combination therapy with metformin, a sulfonyurea (SU), or a thiazolidinedione (TZD), when the single agent alone does not provide adequate glycemic control, and as initial combination with metformin, when treatment with dual saxagliptin and metformin is appropriate. The proposed usual clinical dose is 5 mg once daily, with a recommended dose of 2.5 mg once daily in subjects with moderate or severe renal impairment, and end-stage renal disease requiring hemodialysis.

1.1 Recommendation on Regulatory Action

According to my review of the clinical data, I recommend <u>approval</u> of saxagliptin as an adjunct to diet and exercise to improve glycemic control in adults with type 2 diabetes mellitus (although the Sponsor requested individual indications for various treatment settings, the Division has streamlined the indications for anti-diabetic drugs). The Sponsor has demonstrated modest efficacy along with an acceptable safety profile. However, the following recommendations also apply:

- A dose reduction to 2.5 mg when saxagliptin is used with CYP3A4/5 inhibitors, such as ketoconazole.
- As of the completion of this Review, recommendations regarding the use of saxagliptin in women of childbearing potential have not been finalized. This issue arose out of a preclinical study done to support the fixed dose combination of saxagliptin and metformin in which certain fetal abnormalities were seen (discussed in Section 4.3). Final decisions regarding this issue will be addressed in a pharmacology/toxicology memorandum and the Cross Discipline Team Leader (CDTL) memorandum.

1.2 Risk Benefit Assessment

Although there are a number of available medical therapies available for type 2 diabetes mellitus (Section 2.2), the progressive nature of the disease demands new therapies that can safely and effectively be used either alone or added on to the current armamentarium of drugs. Given that the Sponsor has demonstrated efficacy in monotherapy and combination therapy settings, saxagliptin can play a useful role in type 2 diabetes treatment.

The Sponsor conducted six Phase 3 studies (referred to as "Core Phase 3 studies" in this Review) that were randomized, double-blind, and placebo-controlled (two monotherapy studies, three add-on combination studies to metformin, sulfonylurea, and a thiazolidinedione, and one initial combination with metformin study). In the Phase 3 program, the Sponsor chose to study 3 doses



DOCKET

Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.

