Food and Drug Administration Silver Spring MD 20993

NDA 205834/S-6

#### SUPPLEMENT APPROVAL

Gilead Sciences, Inc. Attention: Prachi Shah, MBS, RAC Associate Manager, Regulatory Affairs 333 Lakeside Drive Foster City, CA 94404

Dear Ms. Shah:

Please refer to your Supplemental New Drug Application (sNDA) dated and received May 15, 2015, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Harvoni<sup>®</sup> (ledipasvir/sofosbuvir), fixed-dose combination tablet, 90 mg/400 mg.

This Prior Approval supplemental new drug application provides for the following change:

 To expand the indication to include treatment of genotype 4, chronic hepatitis C virus infection based upon the results from studies GS-US-337-0115 (ION-4) and GS-US-337-1119

#### APPROVAL & LABELING

We have completed our review of this supplemental application, as amended. It is approved, effective on the date of this letter, for use as recommended in the enclosed, agreed-upon labeling text.

#### **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 <a href="http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm">http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm</a>. Content of labeling must be identical to the enclosed labeling (text for the package insert and text for the patient package insert), with the addition of any labeling changes in pending "Changes Being Effected" (CBE) supplements, 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 titled "SPL Standard for Content of Labeling Technical Qs and As at



http://www.fda.gov/downloads/DrugsGuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf

The SPL will be accessible from publicly available labeling repositories.

Also within 14 days, amend all pending supplemental applications that includes labeling changes for this NDA, including CBE supplements for which FDA has not yet issued an action letter, with the content of labeling [21 CFR 314.50(l)(1)(i)] in MS Word format, that includes the changes approved in this supplemental application, as well as annual reportable changes and annotate each change. To facilitate review of your submission, provide a highlighted or marked-up copy that shows all changes, as well as a clean Microsoft Word version. The marked-up copy should provide appropriate annotations, including supplement number(s) and annual report date(s).

### 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 from birth to less than 3 years because necessary studies are impossible or highly impracticable. This is because spontaneous clearance is possible and very few patients in this age group require treatment.

We are deferring submission of your pediatric studies for ages 3 to 17 years for this application because this product is ready for approval for use in adults and the pediatric studies have not been completed.

Your deferred pediatric study required by section 505B(a) of the FDCA is a required Postmarketing study. The status of the postmarketing study must be reported annually according to 21 CFR 314.81 and section 505B(a)(3)(C) of the FDCA. This required study is listed below.

2985-1 Conduct a study to evaluate the pharmacokinetics, safety and treatment response (using sustained virologic response) of ledipasvir/sofosbuvir in pediatric subjects 3 through 17 years of age with chronic hepatitis C.

Final Protocol Submission: 07/2014 (Completed)

Study Completion: 06/2018 Final Report Submission: 02/2019

Submit the protocol(s) to your IND 115268, with a cross-reference letter to this NDA.

Reports of 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 that are warranted based on the data derived from the 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.

# <u>POSTMARKETING COMMITMENTS SUBJECT TO REPORTING REQUIREMENTS</u> UNDER SECTION 506B

We remind you of your postmarketing commitment:

2985-2 Conduct a study to characterize the cell culture antiviral activity of ledipisvir against representative HCV subtype 4b and 4r isolates, including those with amino acid variability (relative to subtypes 4a and 4d) at NS5A positions 28, 30, 31 and 93.

The timetable you submitted on October 21, 2015, states that you will conduct this study according to the following schedule:

Final Protocol Submission: Not Applicable Study Completion: Not Applicable

Final Report Submission: 06/2016

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 study completion and final report submission date and any changes in plans since the last annual report. 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 the following, in triplicate, (1) a cover letter requesting advisory comments, (2) the proposed materials in draft or mock-up form with annotated references, and (3) the package insert(s) to:

OPDP Regulatory Project Manager Food and Drug Administration Center for Drug Evaluation and Research Office of Prescription Drug Promotion (OPDP) 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 ).

You must submit final promotional materials and package insert(s), accompanied by a Form FDA 2253, at the time of initial dissemination or publication [21 CFR 314.81(b)(3)(i)]. 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 <a href="http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf">http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf</a>. For more information about submission of promotional materials to the Office of Prescription Drug Promotion (OPDP), see <a href="http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm">http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm</a>.

All promotional materials that include representations about your drug product must be promptly revised to be consistent with the labeling changes approved in this supplement, including any new safety information [21 CFR 314.70(a)(4)]. The revisions in your promotional materials should include prominent disclosure of the important new safety information that appears in the revised package labeling. Within 7 days of receipt of this letter, submit your statement of intent to comply with 21 CFR 314.70(a)(4) to the address above, by fax to 301-847-8444, or electronically in eCTD format. For more information about submitting promotional materials in eCTD format, see the draft Guidance for Industry (available at: <a href="http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM443702.pdf">http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM443702.pdf</a>).

# **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 Mammah Sia Borbor, Regulatory Project Manager, at (301) 796-7731.

Sincerely,

{See appended electronic signature page}

Debra Birnkrant, MD Director Division of Antiviral Products Office of Antimicrobial Products Center for Drug Evaluation and Research

ENCLOSURE:

Content of Labeling



This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.
/s/
DEBRA B BIRNKRANT 11/12/2015

