



BLA 125118/S-211

**SUPPLEMENT APPROVAL  
FULFILLMENT OF POSTMARKETING REQUIREMENT**

Bristol-Myers Squibb Company  
P.O. Box 4000  
Princeton, New Jersey 08543-4000

Attention: Dana Leeds, PhD  
US Regulatory Liaison, Global Regulatory Sciences

Dear Dr. Leeds:

Please refer to your Supplemental Biologics License Application (sBLA), dated September 30, 2016, received September 30, 2016, and your amendments, submitted under section 351(a) of the Public Health Service Act for Orenzia (abatacept).

This Prior Approval supplemental biologics application provides for the treatment of moderately to severely active Polyarticular Juvenile Idiopathic Arthritis (pJIA) in patients 2 years of age and older using a subcutaneous dosing regimen and for 2 new strengths (50 mg/0.4 mL and 87.5 mg/0.7 mL) for the prefilled syringe (PFS) presentation.

**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.

**WAIVER OF HIGHLIGHTS SECTION**

Please note that we have previously granted a waiver of the requirements of 21 CFR 201.57(d)(8) regarding the length of Highlights of prescribing information.

**CONTENT OF LABELING**

As soon as possible, but no later than 14 days from the date of this letter, submit, via the FDA automated drug registration and listing system (eLIST), the content of labeling [21 CFR 601.14(b)] in structured product labeling (SPL) format, as described at <http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm>, that is identical to the enclosed labeling (text for the prescribing information, and text for the patient package insert) and include the labeling changes proposed in any pending "Changes Being Effected" (CBE) supplements. 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/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf>.

The SPL will be accessible via publicly available labeling repositories.

Also within 14 days, amend all pending supplemental applications that include labeling changes for this BLA, including pending “Changes Being Effected” (CBE) supplements, for which FDA has not yet issued an action letter, with the content of labeling [21 CFR 601.12(f)] in MS Word format that includes the changes approved in this supplemental application.

### **CARTON AND IMMEDIATE CONTAINER LABELS**

Submit final printed carton and container labels that are identical to the carton and immediate container labels submitted on March 22, 2017, 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 titled “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 “**Product Correspondence – Final Printed Carton and Container Labels for approved BLA 125118.**” 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, 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 for ages birth to less than 2 years because the necessary studies are impossible or highly impracticable. This is because there are small numbers of patients in this age group with the disease.

We note that you have fulfilled the pediatric study requirement for ages 2 to 17 years for this application.

### **FULFILLMENT OF POSTMARKETING REQUIREMENT**

We note that your submission dated September 30, 2016, contained the final study report for the following Postmarketing requirement listed in the July 29, 2011 approval letter for BLA 125118/122.

2606-1      Conduct a PK/Safety study of SC abatacept in polyarticular JIA patients ages 6 to 17 years of age.

Final Protocol Submission:      November 2012  
Study Completion:                      September 2017

Final Report Submission: January 2018

We have reviewed your submission and conclude that the above requirement was fulfilled.

The final reports, submitted on December 20, 2016, for postmarketing commitments, PMC 2321-1 and PMC 2321-2, listed in the December 23, 2005 approval letter are under review. We remind you that there is a postmarketing requirement listed in the April 7, 2008 approval letter that is still open.

**POSTMARKETING REQUIREMENTS UNDER 505(o)**

Section 505(o)(3) of the Federal Food, Drug, and Cosmetic Act (FDCA) authorizes FDA to require holders of approved drug and biological product applications to conduct postmarketing studies and clinical trials for certain purposes, if FDA makes certain findings required by the statute.

We have determined that an analysis of spontaneous postmarketing adverse events reported under subsection 505(k)(1) of the FDCA will not be sufficient to assess the signal of a serious risk of malignancies, autoimmune diseases, and serious infections.

Furthermore, the new pharmacovigilance system that FDA is required to establish under section 505(k)(3) of the FDCA will not be sufficient to assess these serious risks.

Therefore, based on appropriate scientific data, FDA has determined that you are required to conduct the following:

- 3191-1: Observational study in pediatric patients 2 to 5 years of age with juvenile idiopathic arthritis (JIA) treated with abatacept to evaluate the long term safety of abatacept, with respect to the risk of malignancies, autoimmune diseases, and serious infections.

The timetable you submitted on March 30, 2017, states that you will conduct this study according to the following schedule:

Draft protocol submission:	June	2017
Final protocol submission:	September	2017
Study Completion:	December	2028
Final Report Submission:	June	2029

Submit the protocol(s) to your IND 9391, with a cross-reference letter to this BLA. Submit nonclinical and chemistry, manufacturing, and controls protocols and all postmarketing final report(s) to your BLA. Prominently identify the submission with the following wording in bold capital letters at the top of the first page of the submission, as appropriate: **“Required Postmarketing Protocol Under 505(o)”**, **“Required Postmarketing Final Report Under 505(o)”**, **“Required Postmarketing Correspondence Under 505(o)”**.

Submission of the protocol(s) for required postmarketing observational studies to your IND is for purposes of administrative tracking only. These studies do not constitute clinical investigations

pursuant to 21 CFR 312.3(b) and therefore are not subject to the IND requirements under 21 CFR part 312 or FDA's regulations under 21 CFR parts 50 (Protection of Human Subjects) and 56 (Institutional Review Boards).

Submission of the protocol(s) for required postmarketing observational studies to your IND is for purposes of administrative tracking only. These studies do not constitute clinical investigations pursuant to 21 CFR 312.3(b) and therefore are not subject to the IND requirements under 21 CFR part 312 or FDA's regulations under 21 CFR parts 50 (Protection of Human Subjects) and 56 (Institutional Review Boards).

Section 505(o)(3)(E)(ii) of the FDCA requires you to report periodically on the status of any study or clinical trial required under this section. This section also requires you to periodically report to FDA on the status of any study or clinical trial otherwise undertaken to investigate a safety issue. Section 506B of the FDCA, as well as 21 CFR 601.70 requires you to report annually on the status of any postmarketing commitments or required studies or clinical trials.

FDA will consider the submission of your annual report under section 506B and 21 CFR 601.70 to satisfy the periodic reporting requirement under section 505(o)(3)(E)(ii) provided that you include the elements listed in 505(o) and 21 CFR 601.70 . We remind you that to comply with 505(o), your annual report must also include a report on the status of any study or clinical trial otherwise undertaken to investigate a safety issue. Failure to submit an annual report for studies or clinical trials required under 505(o) on the date required will be considered a violation of FDCA section 505(o)(3)(E)(ii) and could result in enforcement action.

### **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 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 601.12(f)(4), you must submit final promotional materials, and the prescribing information, 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 BLA (in 21 CFR 600.80 and in 21 CFR 600.81).

If you have any questions, call Colette Jackson, Senior Regulatory Health Project Manager, at (301) 796-1230.

Sincerely,

*{See appended electronic signature page}*

Sally Seymour, M.D.  
Deputy Director of Safety  
Division of Pulmonary, Allergy, and Rheumatology Products  
Office of Drug Evaluation II  
Center for Drug Evaluation and Research

ENCLOSURE(S):   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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SALLY M SEYMOUR  
03/30/2017