CENTER FOR DRUG EVALUATION AND RESEARCH

Application Number 21-183

APPROVAL LETTER

HFD-530/DSullivan

NDA 21-183

OCT 31 2000

Bristol-Myers Squibb Company
Attention: Cynthia Piccirillo
Associate Director, Regulatory Science
5 Research Parkway
P.O. Box 5100
Wallingford, CT 06492-7660

Dear Ms. Piccirillo:

Please refer to your new drug application (NDA) dated January 31, 2000, received January 31, 2000, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for VIDEX EC (didanosine) Delayed-Release Capsules.

We acknowledge receipt of your submissions dated:

January 31, 2000	February 8, 2000	February 10, 2000
February 16, 2000	February 17, 2000	March 17, 2000
May 23, 2000	May 24, 2000	July 14, 2000
July 18, 2000	August 10, 2000	August 23, 2000
August 29, 2000	September 11, 2000	September 18, 2000
September 19, 2000	September 26, 2000	October 13, 2000
October 16, 2000	October 18, 2000	October 20, 2000
October 24, 2000	October 25, 2000	October 26, 2000
October 30, 2000,	October 31, 2000	

This new drug application provides for the use of VIDEX EC (didanosine) Delayed-Release Capsules, in combination with other antiretroviral agents, for the treatment of HIV infection in adults whose management requires once-daily administration of didanosine or an alternative didanosine formulation.

We have completed the review of this application, as amended, and have concluded that adequate information has been presented to demonstrate that the drug product is safe and effective for use as recommended in the agreed upon labeling text. Accordingly, the application is approved effective on the date of this letter.

The final printed labeling (FPL) must be identical to the submitted draft labeling (package insert submitted October 31, 2000, patient package insert submitted October 31, 2000). Marketing the product with FPL that is not identical to the approved labeling text may render the product misbranded and an unapproved new drug.

APPEARS THIS WAY
ON ORIGINAL

Please submit 20 paper copies of the FPL as soon as it is available, in no case more than 30 days after it is printed. Please individually mount ten of the copies on heavy-weight paper or similar material. Alternatively, you may submit the FPL electronically according to the guidance for industry titled *Providing Regulatory Submissions in Electronic Format - NDAs* (January 1999). For administrative purposes, this submission should be designated "FPL for approved NDA 21-183." Approval of this submission by FDA is not required before the labeling is used.

We remind you of your post marketing commitments specified in your submission dated October 30, 2000. These commitments, along with any completion dates agreed upon, are listed below:

1. The submission of the final report from BMS study AI454-152.

   Projected Submission Date: First quarter 2001

2. The evaluation of the safety and pharmacokinetics of VIDEX EC dosed as a twice daily regimen and a commitment to discuss with DAVDP further clinical development of this regimen based on these results.

   Projected Submission Date: Third quarter 2001

3. The evaluation of the pharmacokinetics and safety of VIDEX EC in appropriate pediatric populations.

   Projected Submission Date: Third quarter 2002

4. The development of educational materials for patients and healthcare providers regarding information about once daily administration of VIDEX EC.

   Projected Submission date: This should be an ongoing commitment to provide this information.

Protocols, data, and final reports should be submitted to your IND for this product and a copy of the cover letter sent to this NDA. If an IND is not required to meet your post marketing commitments, please submit protocols, data and final reports to this NDA as correspondence. In addition, under 21 CFR 314.81(b)(2)(vii), we request that you include a status summary of each commitment in your annual report to this NDA. The status summary should include the number of patients entered in each study, expected completion and submission dates, and any changes in plans since the last annual report. For administrative purposes, all submissions, including labeling supplements, relating to these post marketing commitments must be clearly designated "Post Marketing Commitments."

Validation of the regulatory methods has not been completed. At the present time, it is the policy of the Center not to withhold approval because the methods are being validated. Nevertheless, we expect your continued cooperation to resolve any problems that may be identified.

APPEARS THIS WAY
ON ORIGINAL

Be advised that, as of April 1, 1999, all applications for new active ingredients, new dosage forms, new indications, new routes of administration, and new dosing regimens are required to contain an assessment of the safety and effectiveness of the product in pediatric patients unless this requirement is waived or deferred (63 *FR* 66632). We note that you have not fulfilled the requirements of 21 CFR 314.55 (or 601.27). We are waiving the requirement for studies in children less than six years of age, and we are deferring submission of your pediatric studies for children older than six years of age until September 30, 2002. Please also refer to our Pediatric Written Request dated August 5, 1999, for VIDEX®, NDA 20-154, NDA 20-155, NDA 20-156.

In addition, please submit three copies of the introductory promotional materials that you propose to use for this product. All proposed materials should be submitted in draft or mock-up form, not final print. Please submit one copy to this Division and two copies of both the promotional materials and the package insert directly to:

Division of Drug Marketing, Advertising, and Communications, HFD-42
Food and Drug Administration
5600 Fishers Lane
Rockville, Maryland 20857

Please submit one market package of the drug product when it is available.

We remind you that you must comply with the requirements for an approved NDA set forth under 21 CFR 314.80 and 314.81.

If you have any questions, call Destry M. Sillivan, M.S., Regulatory Project Manager, at (301) 827-2335.

Sincerely,

/S/

Heidi M. Jolson, M.D., M.P.H.
Director
Division of Antiviral Drug Products
Office of Drug Evaluation IV
Center for Drug Evaluation and Research

APPEARS THIS WAY
ON ORIGINAL

Concurrence:
/S/
HFD-530/Dir/Jolson
HFD-530/DepDir/Birnkrant 10/31/00
HFD-530/MO/Fleischer 10/31/00 10/31/00
HFD-530/BioPharm TL/Reynolds
HFD-530/BioPharmR/Kumi, R. 10/31/2000
HFD-530/CTL/Miller, S. 10/31/00
HFD-530/CR/Lo, K. 10/31/00
HFD-530/PharmToxTL/Farrelly
HFD-530/PharmToxR/Bigger
HFD-530/StatisticsTL/Soon 10/31/00
HFD-530/MicroTL/Dempsey 10/31/00
HFD-530/MicroR/Mishra 10/31/00
HFD-530/CPMS/DeCicco 10/31/00
HFD-530/RPM/Sillivan /S/ 10/31/00

cc:
Archival NDA 21-183
HFD-530/Div. Files
HFD-530/D.Sillivan
HFD-530/Dir/Jolson
HFD-530/DepDir/Birnkrant
HFD-530/MO/Fleischer
HFD-530/BioPharm TL/Reynolds
HFD-530/BioPharmR/Kumi, R.
HFD-530/CTL/Miller, S.
HFD-530/CR/Lo, K.
HFD-530/PharmToxTL/Farrelly
HFD-530/PharmToxR/Bigger
HFD-530/StatisticsTL/Soon
HFD-530/MicroTL/Dempsey
HFD-530/MicroR/Mishra
HFD-530/CPMS/DeCicco
HFD-530/RPM/Sillivan
HF-2/MedWatch (with labeling)
HFD-002/ORM (with labeling)
HFD-104/ADRA (with labeling)
HFD-102/Post-Marketing PM
HFD-104/Peds/T.Crescenzi (with labeling)
HFD-42/DDMAC (with labeling)
HFI-20/Press Office (with labeling)
HFD-400/OPDRA (with labeling)
HFD-613/OGD (with labeling)
HFD-095/DDMS-IMT

APPEARS THIS WAY
ON ORIGINAL

HFD-093/DDMS-IST (with labeling)
HFD-830/DNDC Division Director
DISTRICT OFFICE

Drafted by: DMS/October 26, 2000
Initialed by:
final:
filename: V:/DAVDP/CSO/SILLIVAN/NDA/N21183/letters/Approvlet.doc

APPROVAL (AP) (with Post Marketing Commitments)

APPEARS THIS WAY
ON ORIGINAL