



NDA 021959/S-014

## **SUPPLEMENT APPROVAL**

Concordia Pharmaceuticals, Inc.  
c/o Cardinal Health Regulatory Sciences  
7400 West 110th St, Suite 150  
Overland Park, KS 66210

Attention: Juliane Giannantonio, PharmD  
Associate Director, Regulatory Affairs and Product Development

Dear Dr. Giannantonio:

Please refer to your supplemental new drug application (sNDA) dated and received March 1, 2024, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Orapred ODT (prednisolone sodium phosphate orally disintegrating tablets).

We also refer to our letter dated February 8, 2024, notifying you, under Section 505(o)(4) of the FDCA, of new safety information that we have determined should be included in the labeling for systemic (oral and injection) corticosteroids. This information pertains to the risks of activation of latent infections and special pathogens and of Kaposi's sarcoma.

This supplemental new drug application provides for revisions to the labeling for Orapred ODT, consistent with our February 8, 2024, safety labeling change notification.

### **APPROVAL & LABELING**

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

## **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 FDA.gov.<sup>1</sup> Content of labeling must be identical to the enclosed labeling (text for the Prescribing Information), 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. If the content of labeling in SPL format initially submitted with this CBE-0 labeling supplement is identical to the attached approved labeling, an additional submission of content of labeling in SPL format is not required.

Information on submitting SPL files using eList may be found in the guidance for industry *SPL Standard for Content of Labeling Technical Qs and As*.<sup>2</sup>

The SPL will be accessible from publicly available labeling repositories.

## **REQUIRED PEDIATRIC ASSESSMENTS**

Under the Pediatric Research Equity Act (PREA) (21 U.S.C. 355c), all applications for new active ingredients (which includes new salts and new fixed combinations), 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 in pediatric patients unless this requirement is waived, deferred, or inapplicable.

Because none of these criteria apply to your application, you are exempt from this requirement.

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<sup>1</sup> <http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm>

<sup>2</sup> We update guidances periodically. For the most recent version of a guidance, check the FDA Guidance Documents Database <https://www.fda.gov/RegulatoryInformation/Guidances/default.htm>.

## **PROMOTIONAL MATERIALS**

You must submit final promotional materials and Prescribing Information, 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 [FDA.gov](http://FDA.gov).<sup>3</sup> Information and Instructions for completing the form can be found at [FDA.gov](http://FDA.gov).<sup>4</sup>

[NOTE: The use of the term “new safety-related information” below includes new safety information (NSI) as described in section 505-1(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) (21 U.S.C. 355-1(b)) and other safety-related information unrelated to section 505(o)(4) of the FDCA.]

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-related information [21 CFR 314.70(a)(4)]. The revisions in your promotional materials should include prominent disclosure of the important new safety-related information that appears in the revised labeling. Within 7 days of receipt of this letter, submit your statement of intent to comply with 21 CFR 314.70(a)(4).

## **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 Ms. June Germain, Safety Regulatory Project Manager, at 301-796-4024.

Sincerely,

*{See appended electronic signature page}*

Ozlem Belen, MD, MPH  
Deputy Director  
Division of Rheumatology and Transplant  
Medicine  
Office of Immunology and Inflammation  
Office of New Drugs  
Center for Drug Evaluation and Research

### ENCLOSURE:

- Content of Labeling-Prescribing Information

<sup>3</sup> <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083570.pdf>

<sup>4</sup> <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf>

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**This is a representation of an electronic record that was signed electronically. Following this are manifestations of any and all electronic signatures for this electronic record.**  
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/s/  
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