



NDA 022003-S/033  
NDA 205053-S/017  
NDA 205596-S/020  
NDA 214770-S/008

## SUPPLEMENT APPROVAL

Merck Sharp & Dohme LLC  
Deanne Jackson Rudd, PhD.  
Senior Director, Vaccines and Infectious Diseases  
Global Regulatory Affairs and Clinical Safety (GRACS)  
351 N. Sumneytown Pike, PO Box 1000, UG2D-68  
North Wales, PA 19454

Dear Dr. Rudd:

Please refer to your supplemental new drug applications (sNDAs) dated and received September 20, 2024 submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for the following:

NDA 022003/S-033, Noxafil (posaconazole) oral suspension  
NDA 205053/S-017, Noxafil (posaconazole) delayed-release tablets  
NDA 205596/S-020, Noxafil (posaconazole) injection  
NDA 214770/S-008, Noxafil PowderMix (posaconazole) for delayed-release oral suspension

We also refer to our letter dated July 12, 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 posaconazole products. This information pertains to the risk of pseudoaldosteronism.

These supplemental new drug applications provide for revisions to the labeling for Noxafil.

The agreed upon changes to the language included in our July 12, 2024, letter are as follows (additions are noted by double underline and deletions are noted by ~~strikethrough~~).

### HIGHLIGHTS OF PRESCRIBING INFORMATION

### WARNINGS AND PRECAUTIONS

Pseudoaldosteronism: (b) (4) M<sup>(b) (4)</sup><sub>(4)</sub>anifested by the onset

(b) (4) or worsening of hypertension, and abnormal laboratory findings (b) (4) Monitor blood pressure and potassium levels and manage (b) (4) as necessary.

## **FULL PRESCRIBING INFORMATION**

### **5 WARNINGS AND PRECAUTIONS**

#### **5.4 Pseudoaldosteronism**

Pseudoaldosteronism, manifested by the onset of hypertension or worsening of hypertension, and abnormal laboratory findings (hypokalemia, low serum renin and aldosterone, and elevated 11-deoxycortisol), has been reported with posaconazole use in the postmarket setting. Monitor blood pressure and potassium levels and correct manage as necessary. Management of pseudoaldosteronism may include discontinuation of Noxafil, substitution with (b) (4) an appropriate antifungal drug that is not associated with pseudoaldosteronism, or use of aldosterone receptor antagonists (b) (4)

### **APPROVAL & LABELING**

We have completed our review of these applications, as amended. They are 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, 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 *SPL Standard for Content of Labeling Technical Qs and As*.<sup>2</sup>

The SPL will be accessible from publicly available labeling repositories.

---

<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>.

Also within 14 days, amend all pending supplemental applications that include 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(I)(1)(i)] in Microsoft Word format, that includes the changes approved in this supplemental application, as well as annual reportable changes. To facilitate review of your submission(s), 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).

### **PROMOTIONAL MATERIALS**

You may request advisory comments on proposed introductory advertising and promotional labeling. For information about submitting promotional materials, see the final guidance for industry *Providing Regulatory Submissions in Electronic and Non-Electronic Format-Promotional Labeling and Advertising Materials for Human Prescription Drugs*.<sup>3</sup>

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>4</sup> Information and Instructions for completing the form can be found at [FDA.gov](http://FDA.gov).<sup>5</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).

### **PATENT LISTING REQUIREMENTS**

---

<sup>3</sup> For the most recent version of a guidance, check the FDA guidance web page at <https://www.fda.gov/media/128163/download>.

<sup>4</sup> <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083570.pdf>

<sup>5</sup> <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf>

NDA 022003-S/033  
NDA 205053-S/017  
NDA 205596-S/020  
NDA 214770-S/008  
Page 4

Pursuant to 21 CFR 314.53(d)(2) and 314.70(f), certain changes to an approved NDA submitted in a supplement require you to submit patent information for listing in the Orange Book upon approval of the supplement. You must submit the patent information required by 21 CFR 314.53(d)(2)(i)(A) through (C) and 314.53(d)(2)(ii)(A) and (C), as applicable, to FDA on Form FDA 3542 within 30 days after the date of approval of the supplement for the patent information to be timely filed (see 21 CFR 314.53(c)(2)(ii)). You also must ensure that any changes to your approved NDA that require the submission of a request to remove patent information from the Orange Book are submitted to FDA at the time of approval of the supplement pursuant to 21 CFR 314.53(d)(2)(ii)(B) and 314.53(f)(2)(iv).

### **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 questions, call Alison Rodgers, Senior Regulatory Project Manager, at 301-796-0797.

Sincerely,

*{See appended electronic signature page}*

Mukil Natarajan, MD  
Deputy Director for Safety  
Division of Anti-Infectives  
Office of Infectious Diseases  
Office of New Drugs  
Center for Drug Evaluation and Research

### **ENCLOSURES:**

- Content of Labeling
  - Prescribing Information
  - Patient Package Insert

-----  
**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.**  
-----

/s/  
-----

MUKILAN NATARAJAN  
10/25/2024 09:21:57 AM