NDA 022038/S-014

SUPPLEMENT APPROVAL

Vertical Pharmaceuticals, LLC
Attention: Laura Hawkins
Associate Director, Regulatory Affairs
1880 McFarland Pkwy, Suite 110-B
Alpharetta, GA 30005

Dear Laura Hawkins:

Please refer to your supplemental new drug application (sNDA) dated and received January 16, 2025, and your amendment, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Divigel (estradiol gel).

This Prior Approval sNDA provides for revisions to the Prescribing Information (PI), Patient Package Insert (PPI), and Carton and Container Labeling in response to our November 22, 2024, Prior Approval Supplement request letter. The requested revisions were:

(1) Include the excipients on the container and carton labels as per 21 CFR 201.100(b)(5).

(2) Include the pharmacological or therapeutic class of the drug product in the DESCRIPTION section of the Prescribing Information per 21 CFR 201.57(c)(12)(i)(E).

(3) Express the alcohol content in the labeling (container, carton, Prescribing Information, and Patient Information) as per 21 CFR 201.10(d)(2).

APPROVAL & LABELING

We have completed our review of this application, as amended. 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.[1] Content of labeling must be identical to the enclosed labeling (text for the

[1] http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm

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*.[2]

The SPL will be accessible from publicly available labeling repositories.

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(l)(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).

CARTON AND CONTAINER LABELING

Submit final printed carton and container labeling that are identical to the enclosed carton and container labeling **and** carton and container labeling submitted on January 16, 2025, as soon as they are available, but no more than 30 days after they are printed. Please submit these labeling electronically according to the guidance for industry *Providing Regulatory Submissions in Electronic Format — Certain Human Pharmaceutical Product Applications and Related Submissions Using the eCTD Specifications*. For administrative purposes, designate this submission "**Final Printed Carton and Container Labeling for approved NDA 022038/S-014**." 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 (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 supplemental application, you are exempt from this requirement.

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

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, contact Samantha Bell, Regulatory Project Manager, at (301) 796-9687 or samantha.bell@fda.hhs.gov.

Sincerely,

{See appended electronic signature page}

Aisha Johnson, MD, MPH, MBA
Deputy Director for Safety (Acting)
Division of Urology, Obstetrics, and Gynecology
Office of Rare Diseases, Pediatrics, Urologic, and Reproductive Medicine
Center for Drug Evaluation and Research

ENCLOSURES:

- Content of Labeling
  - Prescribing Information
  - Patient Package Insert
- Carton and Container Labeling

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/

AISHA P JOHNSON
04/29/2025 10:48:30 AM