DEPARTMENT OF HEALTH AND HUMAN SERVICES

Food and Drug Administration
Silver Spring MD 20993

NDA 202155-S011

SUPPLEMENT APPROVAL

Bristol-Myers Squibb
ATTENTION: Sekayi Mushonga, PharmD
Director, US Regulatory Liaison CV & Metabolics
P.O. Box 4000
Princeton, NJ 08543-4000

Dear Dr. Mushonga:

Please refer to your Supplemental New Drug Application (sNDA) dated 15 December 2014, received 15 December 2014, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Eliquis (apixaban) 2.5 and 5 mg Tablets.

We acknowledge receipt of your amendments dated 24 March and 28 April 2015.

This Prior Approval supplemental new drug application proposes changes to labeling which is aimed to harmonize the presentation of safety and efficacy data in the labels for all recently approved non-vitamin K-dependent oral anticoagulants (NOACs). The agreed upon changes are as follows:

1. In Section 6, **ADVERSE REACTIONS**, the presentation of the bleeding events was amended to appear as follows. To eliminate redundancy, some information that once appeared prior to the bleeding table (and in the table) was also deleted:

Table 1: Bleeding Events in Patients with Nonvalvular Atrial Fibrillation in ARISTOTLE*

	ELIQUIS N=9088 n (per 100 pt-year)	Warfarin N=9052 n (per 100 pt-year)	Hazard Ratio (95% CI)	P-value
Major†	327 (2.13)	462 (3.09)	0.69 (0.60, 0.80)	<0.0001
Intracranial (ICH)‡	52 (0.33)	125 (0.82)	0.41 (0.30, 0.57)	-
Hemorrhagic stroke§	38 (0.24)	74 (0.49)	0.51 (0.34, 0.75)	-
Other ICH	15 (0.10)	51 (0.34)	0.29 (0.16, 0.51)	-
Gastrointestinal (GI)¶	128 (0.83)	141 (0.93)	0.89 (0.70, 1.14)	-
Fatal**	10 (0.06)	37 (0.24)	0.27 (0.13, 0.53)	-
Intracranial	4 (0.03)	30 (0.20)	0.13 (0.05, 0.37)	-
Non-intracranial	6 (0.04)	7 (0.05)	0.84 (0.28, 2.15)	-

* Bleeding events within each subcategory were counted once per subject, but subjects may have contributed events to multiple endpoints. Bleeding events were counted during treatment or within 2 days of stopping study treatment (on-treatment period).

† Defined as clinically overt bleeding accompanied by one or more of the following: a decrease in hemoglobin of ≥2 g/dL, a transfusion of 2 or more units of packed red blood cells, bleeding at a critical site: intracranial, intraspinal, intraocular, pericardial, intra-articular, intramuscular with compartment syndrome, retroperitoneal or with fatal outcome.

‡ Intracranial bleed includes intracerebral, intraventricular, subdural, and subarachnoid bleeding. Any type of hemorrhagic stroke was adjudicated and counted as an intracranial major bleed.

§ On-treatment analysis based on the safety population, compared to ITT analysis presented in Section 14.

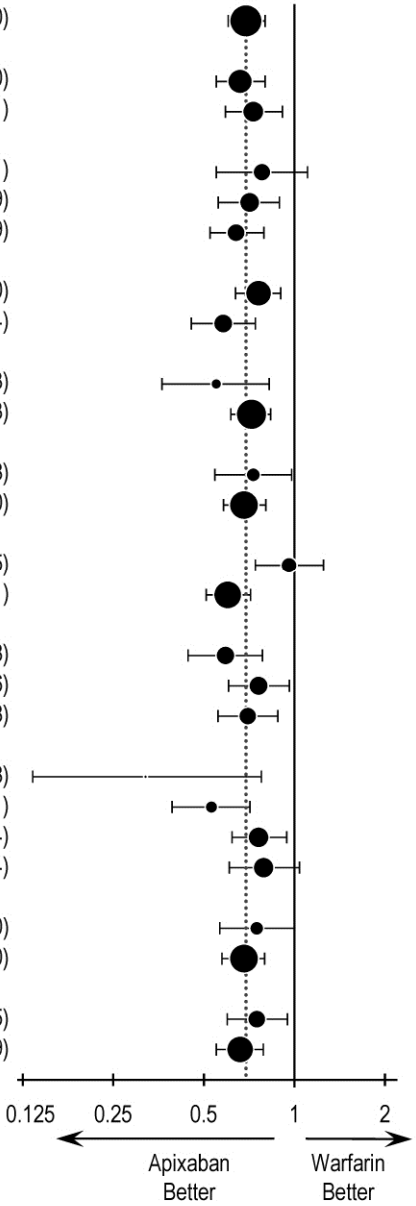
¶ GI bleed includes upper GI, lower GI, and rectal bleeding.

** Fatal bleeding is an adjudicated death with the primary cause of death as intracranial bleeding or non-intracranial bleeding during the on-treatment period.

2. The following forest plot in Section 6 was amended to include only the following subgroups and presented in include n/N(%/yr) for apixaban and warfarin, the hazard ratio, and to remove the p-value. An overall effect line was also added to the plot. The population used was On-Treatment plus 2 days:

Figure 1: Major Bleeding Hazard Ratios by Baseline Characteristics – ARISTOTLE Study

Subgroup	n of Events / N of Patients (% per year) Apixaban	Warfarin	Hazard Ratio (95% CI)
All Patients	327 / 9088 (2.1)	462 / 9052 (3.1)	0.69 (0.60, 0.80)
Prior Warfarin/VKA Status			
Experienced (57%)	185 / 5196 (2.1)	274 / 5180 (3.2)	0.66 (0.55, 0.80)
Naive (43%)	142 / 3892 (2.2)	188 / 3872 (3.0)	0.73 (0.59, 0.91)
Age			
<65 (30%)	56 / 2723 (1.2)	72 / 2732 (1.5)	0.78 (0.55, 1.11)
≥65 and <75 (39%)	120 / 3529 (2.0)	166 / 3501 (2.8)	0.71 (0.56, 0.89)
≥75 (31%)	151 / 2836 (3.3)	224 / 2819 (5.2)	0.64 (0.52, 0.79)
Sex			
Male (65%)	225 / 5868 (2.3)	294 / 5879 (3.0)	0.76 (0.64, 0.90)
Female (35%)	102 / 3220 (1.9)	168 / 3173 (3.3)	0.58 (0.45, 0.74)
Weight			
≤60 kg (11%)	36 / 1013 (2.3)	62 / 965 (4.3)	0.55 (0.36, 0.83)
>60 kg (89%)	290 / 8043 (2.1)	398 / 8059 (3.0)	0.72 (0.62, 0.83)
Prior Stroke or TIA			
Yes (19%)	77 / 1687 (2.8)	106 / 1735 (3.9)	0.73 (0.54, 0.98)
No (81%)	250 / 7401 (2.0)	356 / 7317 (2.9)	0.68 (0.58, 0.80)
Diabetes Mellitus			
Yes (25%)	112 / 2276 (3.0)	114 / 2250 (3.1)	0.96 (0.74, 1.25)
No (75%)	215 / 6812 (1.9)	348 / 6802 (3.1)	0.60 (0.51, 0.71)
$CHADS_2$ Score			
≤1 (34%)	76 / 3093 (1.4)	126 / 3076 (2.3)	0.59 (0.44, 0.78)
2 (36%)	125 / 3246 (2.3)	163 / 3246 (3.0)	0.76 (0.60, 0.96)
≥3 (30%)	126 / 2749 (2.9)	173 / 2730 (4.1)	0.70 (0.56, 0.88)
Creatinine Clearance			
<30 mL/min (1%)	7 / 136 (3.7)	19 / 132 (11.9)	0.32 (0.13, 0.78)
30–50 mL/min (15%)	66 / 1357 (3.2)	123 / 1380 (6.0)	0.53 (0.39, 0.71)
>50–80 mL/min (42%)	157 / 3807 (2.5)	199 / 3758 (3.2)	0.76 (0.62, 0.94)
>80 mL/min (41%)	96 / 3750 (1.5)	119 / 3746 (1.8)	0.79 (0.61, 1.04)
Geographic Region			
US (19%)	83 / 1716 (2.8)	109 / 1693 (3.8)	0.75 (0.56, 1.00)
Non-US (81%)	244 / 7372 (2.0)	353 / 7359 (2.9)	0.68 (0.57, 0.80)
Aspirin at Randomization			
Yes (31%)	129 / 2846 (2.7)	164 / 2762 (3.7)	0.75 (0.60, 0.95)
No (69%)	198 / 6242 (1.9)	298 / 6290 (2.8)	0.66 (0.55, 0.79)



3. The following standard cautionary paragraph was included at the bottom of the forest plot:

   Note: The figure above presents effects in various subgroups, all of which are baseline characteristics and all of which were pre-specified, if not the groupings. The 95% confidence limits that are shown do not take into account how many comparisons were made, nor do they reflect the effect of a particular factor after adjustment for all other factors. Apparent homogeneity or heterogeneity among groups should not be over-interpreted.

4. In Section 14, **CLINICAL STUDIES**, the forest plot was amended to include the same subgroups as the plot in Section 6 and also to present the data in an identical way as Section 6. The population used to generate the forest plot, however, is different than that in Section 6. The population used in Section 14 was Intent-to-Treat (ITT).

5. In the **HIGHLIGHTS**, the Recent Major Changes section was updated to remove any changes that were outside of 1 year. The corresponding vertical line in the full prescribing information noting the changes was therefore also removed.

6. Other minor editorial changes were also made throughout the label.

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.

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 http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm. Content of labeling must be identical to the enclosed labeling (text for the 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 titled "SPL Standard for Content of Labeling Technical Qs and As at http://www.fda.gov/downloads/DrugsGuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf

The SPL will be accessible from publicly available labeling repositories.

Also within 14 days, amend all pending supplemental applications that includes 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 MS Word format, that includes the changes approved in this supplemental application, as well as annual reportable changes and annotate each change. To facilitate review of your submission, 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).

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, please contact:

Alison Blaus, RAC
Senior Regulatory Project Manager
(301) 796-1138

Sincerely,

{See appended electronic signature page}

Mary Ross Southworth, Pharm.D.
Deputy Director for Safety
Division of Cardiovascular and Renal Products
Office of Drug Evaluation I
Center for Drug Evaluation and Research

ENCLOSURE:
Content of Labeling

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

ALISON L BLAUS
09/09/2015

MARY R SOUTHWORTH
09/10/2015