DEPARTMENT OF HEALTH AND HUMAN SERVICES

Food and Drug Administration
Silver Spring MD 20993

NDA 205489

NDA APPROVAL

Neos Therapeutics, Inc.
Attention: Dorothy J. Engelking
Vice President, Regulatory Affairs
2940 N. HWY 360, Suite 400
Grand Prairie, TX 75050

Dear Ms. Engelking:

Please refer to your New Drug Application (NDA) dated and received on January 9, 2015, and your amendments, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act for Cotempla XR-ODT (methylphenidate extended-release orally disintegrating tablets) 8.6 mg, 17.3 mg, and 25.9 mg.

We also refer to our approval letter dated June 19, 2017 which contained the following error: strengths of 10 mg, 20 mg, and 30 mg were mistakenly used in the first paragraph of the approval letter instead of the correct 8.6 mg, 17.3 mg, and 25.9 mg strengths.

This replacement approval letter incorporates the correction of the error. The effective approval date will remain June 19, 2017, the date of the original approval letter.

We acknowledge receipt of your amendment dated December 19, 2016, which constituted a complete response to our November 6, 2015, action letter.

This new drug application provides for the use of Cotempla XR-ODT (methylphenidate extended-release orally disintegrating tablets) for the treatment of Attention Deficit Hyperactivity Disorder (ADHD).

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 text.

WAIVER OF HIGHLIGHTS SECTION

We are waiving the requirements of 21 CFR 201.57(d)(8) regarding the length of Highlights of prescribing information. This waiver applies to all future supplements containing revised labeling unless we notify you otherwise.

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 and Medication Guide). 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*, available at http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf

The SPL will be accessible via publicly available labeling repositories.

CARTON AND IMMEDIATE CONTAINER LABELS

We acknowledge your May 23, 2017, submission containing final printed carton and container labels.

REQUIRED PEDIATRIC ASSESSMENTS

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

We are waiving the pediatric studies requirement for ages 0 to less than 4 years because necessary studies are impossible or highly impracticable. This is because the diagnostic criteria and assessment measures for determining efficacy for the treatment of ADHD in children less than 4 years old are not well defined and studies in this age group are a challenge regarding patient safety and study validity. Pharmaceutical treatment in this age group is uncommon and non-medication interventions are preferred treatment for behavioral disorders such as ADHD in very young children (e.g., less than 4 years of age).

We are deferring submission of your pediatric studies for ages 4 to less than 6 years for this application because this product is ready for approval for use in pediatric patients 6 to 17 years old, and the studies in patients 4 to less than 6 years have not been completed.

Your deferred pediatric studies required by section 505B(a) of the FDCA are required postmarketing studies. The status of these postmarketing studies must be reported annually according to 21 CFR 314.81 and section 505B(a)(3)(C) of the FDCA. These required studies are listed below.

3222-1 Conduct an open-label, randomized, single-dose level, safety, tolerability, and pharmacokinetic study of Cotempla XR-ODT (methylphenidate extended-release orally disintegrating tablets) in male and female children (4 to less than 6 years of age) with ADHD.

Final Protocol Submission: January 2018
Study/Trial Completion: July 2019
Final Report Submission: December 2019

3222-2 Conduct a randomized, double-blind, placebo-controlled safety and efficacy study of Cotempla XR-ODT (methylphenidate extended-release orally disintegrating tablets) in children ages 4 to less than 6 years diagnosed with ADHD.

Final Protocol Submission: October 2019
Study/Trial Completion: April 2022
Final Report Submission: August 2022

3222-3 Conduct a six month, Open-Label extension study to obtain additional information on safety and tolerability of Cotempla XR-ODT (methylphenidate extended-release orally disintegrating tablets) in children age 4 to less than 6 years of age diagnosed with ADHD.

Final Protocol Submission: October 2019
Study/Trial Completion: April 2023
Final Report Submission: August 2023

Submit the protocols to your IND 109108, with a cross-reference letter to this NDA.

Reports of these required pediatric postmarketing studies must be submitted as a new drug application (NDA) or as a supplement to your approved NDA with the proposed labeling changes you believe are warranted based on the data derived from these studies. When submitting the reports, please clearly mark your submission "**SUBMISSION OF REQUIRED PEDIATRIC ASSESSMENTS**" in large font, bolded type at the beginning of the cover letter of the submission.

This product is appropriately labeled for use in ages 6 to 17 years for this indication. Therefore, no additional pediatric studies are needed in this pediatric group.

PROMOTIONAL MATERIALS

You may request advisory comments on proposed introductory advertising and promotional labeling. To do so, submit, in triplicate, a cover letter requesting advisory comments, the proposed materials in draft or mock-up form with annotated references, and the package insert, Medication Guide, and patient PI (as applicable) to:

OPDP Regulatory Project Manager
Food and Drug Administration
Center for Drug Evaluation and Research
Office of Prescription Drug Promotion
5901-B Ammendale Road
Beltsville, MD 20705-1266

Alternatively, you may submit a request for advisory comments electronically in eCTD format. For more information about submitting promotional materials in eCTD format, see the draft Guidance for Industry (available at: http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM443702.pdf).

As required under 21 CFR 314.81(b)(3)(i), you must submit final promotional materials, and the package insert, at the time of initial dissemination or publication, accompanied by a Form FDA 2253. Form FDA 2253 is available at http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083570.pdf. Information and Instructions for completing the form can be found at http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf. For more information about submission of promotional materials to the Office of Prescription Drug Promotion (OPDP), see http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm.

EXPIRATION

In accordance with ICH Q1E and based on our review of the stability data submitted, we grant a 15 month expiration dating period for Cotempla XR-ODT when stored in the commercial packaging at the recommended storage condition

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 Bill Bender, Senior Regulatory Project Manager, at (301) 796-2145 or via email at william.bender@fda.hhs.gov.

Sincerely,

{See appended electronic signature page}

Mitchell V. Mathis, M.D.
Director
Division of Psychiatry Products
Office of Drug Evaluation I
Center for Drug Evaluation and Research

Enclosures:
Content of Labeling
Carton and Container Labeling

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

/s/

MITCHELL V Mathis
06/19/2017