



NDA 208351/S-014
NDA 208351/S-015

SUPPLEMENT APPROVALS FULFILLMENT OF POSTMARKETING REQUIREMENT

Gilead Sciences, Inc.
Attention: Yasaman Ahrari
Associate II, Regulatory Affairs
333 Lakeside Drive
Foster City, CA 94404

Dear Yasaman Ahrari:

Please refer to your supplemental new drug applications (sNDA) dated and received April 19, 2024, and your amendments, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for ODEFSEY (emtricitabine, rilpivirine, and tenofovir alafenamide) tablets, 200 mg/25 mg/25 mg.

These Prior Approval supplemental new drug applications provide for the following changes:

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|---------------|--|
| Supplement 14 | To expand the patient population to include pediatric patients weighing at least 25 kg to less than 35 kg for the treatment of HIV-1 infection as initial therapy in those with no antiretroviral treatment history with HIV-1 RNA less than or equal to 100,000 copies per mL |
| Supplement 15 | To expand the patient population to include pediatric patients weighing at least 25 to less than 35 kg for the treatment of HIV-1 infection to replace a stable antiretroviral regimen in those who are virologically-suppressed (HIV-1 RNA less than 50 copies/mL). |

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.

PEDIATRIC RESPONSE

These supplements provide for pediatric labeling text pursuant to the Pediatric Research Equity Act (PREA). These approvals are in response to a PREA PMR.

WAIVER OF ½ PAGE LENGTH REQUIREMENT FOR HIGHLIGHTS

Please note that we have previously granted a waiver of the requirements of 21 CFR 201.57(d)(8) regarding the length of Highlights of Prescribing Information.

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 Prescribing Information and 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).

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.

We note that you have fulfilled the pediatric study requirement for pediatric patients 6 years to less than 12 years, weighing 25 kg to less than 35 kg for this application.

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

² 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>.

FULFILLMENT OF POSTMARKETING REQUIREMENT

We have received your submission dated April 19, 2024, containing the final reports for the following postmarketing requirement listed in the March 1, 2016 approval letter.

- 3043-1 Using data from agreed upon studies of the component products, conduct and submit an assessment of safety, pharmacokinetics, and antiviral activity of ODEFSEY® (emtricitabine, rilpivirine, and tenofovir alafenamide) in pediatric patients 6 years to less than 12 years of age OR greater than 25 kg.

We have reviewed your submission and conclude that the above requirement was fulfilled.

This completes all of your postmarketing requirement acknowledged in our March 1, 2016, letter. You are not required to report on the status of closed (released or fulfilled) PMRs/PMC in your annual report required under 21 CFR 314.81(b)(2)(vii) of the FD&CA.

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*.³

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.⁴ Information and Instructions for completing the form can be found at FDA.gov.⁵

PATENT LISTING REQUIREMENTS

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

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

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

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

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 any questions, contact me by email at Uchenna.lhenachor@fda.hhs.gov or telephone at (301) 796-5327.

Sincerely,

{See appended electronic signature page}

Wendy Carter, DO
Director
Division of Antivirals
Office of Infectious Diseases
Office of New Drugs
Center for Drug Evaluation and Research

ENCLOSURE(S):

- 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/

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