



NDA 215499/S-8

**SUPPLEMENT APPROVAL
FULFILLMENT OF POSTMARKETING REQUIREMENT**

ViiV Healthcare Company
Attention: Jeffrey S. Troughton
Director of Therapeutic Group, Global Regulatory Affairs
410 Blackwell Street
Durham, NC 27701

Dear Jeffrey Troughton:

Please refer to your supplemental new drug application (sNDA) dated and received March 27, 2024, and your amendments, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Apretude (cabotegravir extended-release injectable suspension), injection.

This Prior Approval supplemental new drug application (sNDA) provides for the following changes to the labeling:

- To update the labeling with additional data from pediatric patients who were enrolled in HIV-1 pre-exposure prophylaxis studies HPTN-083-01 and HPTN-084-01
- To remove the neural tube defect information from USE IN SPECIFIC POPULATIONS, Pregnancy
- To remove information regarding “kidney problems” from the Patient Information section titled “Before receiving APRETUDE, tell your healthcare provider about all your medical conditions, including if you:”

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.

Apretude (cabotegravir extended-release injectable suspension) is approved for HIV-1 pre-exposure prophylaxis in adolescents weighing at least 35 kg who are at risk for HIV-1 acquisition. This supplement provides for pediatric labeling text pursuant to the Pediatric Research Equity Act (PREA). This approval is 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, Patient Package Insert, and Instructions for Use), with the addition of any labeling changes in pending “Changes Being Effectuated” (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.

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>.

We note that you have fulfilled the pediatric study requirement for ages 12 to less than 18 years of age, weighing at least 35 kg for this application.

FULFILLMENT OF POSTMARKETING REQUIREMENT

We have received your submission dated March 27, 2024, containing the final report for the following postmarketing requirement listed in the December 20, 2021 approval letter.

- 4191-1 Conduct a trial to evaluate the safety, tolerability, and acceptability of cabotegravir extended-release injectable suspension (CAB LA) for pre-exposure prophylaxis (PrEP) in adolescents weighing at least 35 kg, who are at risk of sexually acquired HIV-1 infection. The trial should capture data on resistance among participants who become infected during PrEP use or within one year of discontinuing PrEP.
- a) Adherence data
 - b) Information on adverse events and treatment discontinuations
 - c) Information on patterns of sexual risk behavior over time
 - d) Resistance analyses of viral isolates from those who acquire HIV-1, including a description of the methodologies used to evaluate resistance
 - e) Pharmacokinetic data

Submit Clinical Study Reports (CSR) from the HPTN adolescent sub-studies and from the MOCHA study.

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

We remind you that there is a postmarketing requirement listed in the December 20, 2021 approval letter that is still open.

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 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).

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

REPORTING REQUIREMENTS

We remind you that you must comply with reporting requirements for an approved NDA (21 CFR 314.80 and 314.81).

Your product is a Part 3 combination product (21 CFR 3.2(e)); therefore, you must also comply with postmarketing safety reporting requirements for an approved combination product (21 CFR 4, Subpart B). Additional information on combination product postmarketing safety reporting is available at FDA.gov.⁶

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>

⁶ <https://www.fda.gov/combination-products/guidance-regulatory-information/postmarketing-safety-reporting-combination-products>

If you have any questions, contact Raina Pandya, Regulatory Project Manager, at (240) 402-3941.

Sincerely,

{See appended electronic signature page}

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

ENCLOSURES:

- Content of Labeling
 - Prescribing Information
 - Patient Package Insert
 - Instructions for Use

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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