

BLA 761279/S-002

## SUPPLEMENT APPROVAL

Eli Lilly and Company  
Attention: Mitchell Cunningham, PharmD  
Senior Director, Global Regulatory Affairs – Americas  
Lilly Corporate Center  
Drop Code 2543  
Indianapolis, IN 46285

Dear Dr. Cunningham:

Please refer to your supplemental biologics license application (sBLA), dated March 15, 2024, and received March 15, 2024, and your amendments, submitted under section 351(a) of the Public Health Service Act for Omvoh (mirikizumab-mrkz) injection.

This Prior Approval supplemental biologics license application provides for the addition of an indication for the treatment of moderately to severely active Crohn's disease in adults.

The application also provides for the reformulation of the drug substance (b) (4) and revision of the manufacturing process for new presentations of 200 mg/2 mL prefilled pen (PFP) and 200 mg/2 mL prefilled syringe (PFS) and the 100 mg/mL PFP and 100 mg/mL PFS for use in subcutaneous maintenance dosing for the treatment of moderately to severely active Crohn's disease in adults.

### **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.

### **WAIVER OF ½ PAGE LENGTH REQUIREMENT FOR HIGHLIGHTS**

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, via the FDA automated drug registration and listing system (eLIST), the content of labeling [21 CFR 601.14(b)] in structured product labeling (SPL) format, as described at

FDA.gov,<sup>1</sup> that is identical to the enclosed labeling (text for the Prescribing Information, Instructions for Use, and Medication Guide) and include the labeling changes proposed in any pending “Changes Being Effected” (CBE) supplements.

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*.<sup>2</sup>

The SPL will be accessible via publicly available labeling repositories.

Also within 14 days, amend all pending supplemental applications that include labeling changes for this BLA, including pending “Changes Being Effected” (CBE) supplements, for which FDA has not yet issued an action letter, with the content of labeling [21 CFR 601.12(f)] 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 carton and container labeling submitted on December 18, 2024, 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 BLA 761279/S-002.**” 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(s) in pediatric patients unless this requirement is waived, deferred, or inapplicable.

Because this drug product for this indication has an orphan drug designation, you are exempt from this requirement.

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

<sup>2</sup> 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>.

## **POSTMARKETING REQUIREMENTS UNDER 505(o)**

Section 505(o)(3) of the Federal Food, Drug, and Cosmetic Act (FDCA) authorizes FDA to require holders of approved drug and biological product applications to conduct postmarketing studies and clinical trials for certain purposes, if FDA makes certain findings required by the statute.

We have determined that an analysis of spontaneous postmarketing adverse events reported under subsection 505(k)(1) of the FDCA will not be sufficient to assess an unexpected serious risk of liver injury from the use of Omvoh (mirikizumab-mrkz).

Furthermore, the active postmarket risk identification and analysis system as available under section 505(k)(3) of the FDCA will not be sufficient to assess this serious risk.

Therefore, based on appropriate scientific data, FDA has determined that you are required to conduct the following studies:

- 4770-1 Conduct an observational study to assess the incidence of severe acute liver injury in adults with moderately to severely active Crohn's disease who are exposed to Omvoh (mirikizumab-mrkz), relative to other therapies used to treat Crohn's disease. Compare rates (per person-time) or risks (proportion of patients with a minimum amount of follow-up). Describe and justify the choice of appropriate comparator population(s). Specify concise case definition for severe liver injury and validation of algorithm(s) to identify severe liver injury in the proposed data source. For the Omvoh (mirikizumab-mrkz)-exposed and comparator(s) cohorts, clearly define the study drug initiation period and any inclusion and exclusion criteria. Ensure that the data source allows for average follow-up for at least 1 year. Specify a minimum sample size and justify the precision of the estimate achievable with the proposed study. The ongoing observational study in patients with ulcerative colitis (PMR 4409-4) with the same objectives may be amended to also enroll patients with Crohn's disease.

The timetable you submitted on November 22, 2024, states that you will conduct this study according to the following schedule:

Final Protocol Submission: 12/2025  
Study Completion: 12/2036  
Interim Submission: 12/2030  
Final Report Submission: 06/2037

FDA considers the term *final* to mean that the applicant has submitted a protocol, the FDA review team has sent comments to the applicant, and the protocol has been revised as needed to meet the goal of the study or clinical trial.<sup>3</sup>

Submit clinical protocol(s) to your IND 130052 with a cross-reference letter to this BLA. Submit nonclinical and chemistry, manufacturing, and controls protocols and all final report(s) to your BLA. Prominently identify the submission with the following wording in bold capital letters at the top of the first page of the submission, as appropriate:

**REQUIRED POSTMARKETING PROTOCOL UNDER 505(o), REQUIRED POSTMARKETING FINAL REPORT UNDER 505(o), REQUIRED POSTMARKETING CORRESPONDENCE UNDER 505(o).**

Submission of the protocol(s) for required postmarketing observational studies to your IND is for purposes of administrative tracking only. These studies do not constitute clinical investigations pursuant to 21 CFR 312.3(b) and therefore are not subject to the IND requirements under 21 CFR part 312.

Section 505(o)(3)(E)(ii) of the FDCA requires you to report periodically on the status of any study or clinical trial required under this section. This section also requires you to periodically report to FDA on the status of any study or clinical trial otherwise undertaken to investigate a safety issue. Section 506B(a)(1) of the FDCA, as well as 21 CFR 601.70 requires you to report annually on the status of any postmarketing commitments or required studies or clinical trials.

FDA will consider the submission of your annual report under section 506B(a)(1) and 21 CFR 601.70 to satisfy the periodic reporting requirement under section 505(o)(3)(E)(ii) provided that you include the elements listed in 505(o) and 21 CFR 601.70. We remind you that to comply with 505(o), your annual report must also include a report on the status of any study or clinical trial otherwise undertaken to investigate a safety issue. Failure to submit an annual report for studies or clinical trials required under 505(o) on the date required will be considered a violation of FDCA section 505(o)(3)(E)(ii) and would result in enforcement action.

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<sup>3</sup> See the guidance for Industry *Postmarketing Studies and Clinical Trials—Implementation of Section 505(o)(3) of the Federal Food, Drug, and Cosmetic Act (October 2019)*.  
<https://www.fda.gov/RegulatoryInformation/Guidances/default.htm>.

## **POSTMARKETING COMMITMENTS SUBJECT TO REPORTING REQUIREMENTS UNDER SECTION 506B**

We remind you of your postmarketing commitments:

- 4770-2 Complete the ongoing one-year phase 3 trial to evaluate the safety, efficacy, and pharmacokinetics of Omvoh (mirikizumab-mrkz) in pediatric patients 2 to 17 years of age with moderately to severely active CD.

The timetable you submitted on November 22, 2024, states that you will conduct this study according to the following schedule:

Study Completion: 04/2029  
Final Report Submission: 10/2029

- 4770-3 Complete the long-term extension trial to evaluate the long-term safety of Omvoh (mirikizumab-mrkz) in pediatric patients 2 to 17 years of age with moderately to severely active CD who participated in the postmarketing commitment 4770-2.

The timetable you submitted on November 22, 2024, states that you will conduct this study according to the following schedule:

Study Completion: 04/2034  
Final Report Submission: 10/2034

Submit clinical protocols to your IND 130052 for this product. Submit nonclinical and chemistry, manufacturing, and controls protocols and all postmarketing final reports to this BLA. In addition, under 21 CFR 601.70 you should include a status summary of each commitment in your annual progress report of postmarketing studies to this BLA. The status summary should include expected summary completion and final report submission dates, any changes in plans since the last annual report, and, for clinical studies/trials, number of patients/subjects entered into each study/trial. All submissions, including supplements, relating to these postmarketing commitments should be prominently labeled "**Postmarketing Commitment Protocol**," "**Postmarketing Commitment Final Report**," or "**Postmarketing Commitment Correspondence**."

## **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.*<sup>4</sup>

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.<sup>5</sup> Information and Instructions for completing the form can be found at FDA.gov.<sup>6</sup>

**REPORTING REQUIREMENTS**

We remind you that you must comply with reporting requirements for an approved BLA (in 21 CFR 600.80 and in 21 CFR 600.81).

If you have any questions, contact Songe Baek, Regulatory Project Manager, at (240) 402-6117 or [Songe.Baek@fda.hhs.gov](mailto:Songe.Baek@fda.hhs.gov).

Sincerely,

*{See appended electronic signature page}*

Jessica J. Lee, MD, MMSc  
Director  
Division of Gastroenterology  
Office of Immunology and Inflammation  
Center for Drug Evaluation and Research

**ENCLOSURES:**

- Content of Labeling
  - Prescribing Information
  - Medication Guide
  - Instructions for Use

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<sup>4</sup> For the most recent version of a guidance, check the FDA guidance web page at <https://www.fda.gov/media/128163/download>.

<sup>5</sup> <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083570.pdf>

<sup>6</sup> <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf>

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**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.**  
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/s/  
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JESSICA J LEE  
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