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RESEARCH**

APPLICATION NUMBER:

214324Orig1s000

OTHER ACTION LETTERS



NDA 214324

COMPLETE RESPONSE

United Therapeutics Corp.
Attention: Sarah Gemberling, PhD, RAC
Manager, Regulatory Affairs
55 TW Alexander Drive, PO Box 14186
Research Triangle Park, NC 27709

Dear Dr. Gemberling:

Please refer to your new drug application (NDA) dated April 16, 2021, received April 16, 2021, and your amendments, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act for treprostinil inhalation powder.

We have completed our review of this application, as amended, and have determined that we cannot approve this application in its present form. We have described our reasons for this action below and, where possible, our recommendations to address these issues.

FACILITY INSPECTIONS

During a recent inspection of the [REDACTED] (b) (4) for this application, our field investigator conveyed deficiencies to the representative of the facility. As a result of this inspection, FDA has classified this facility as Official Action Indicated (OAI) on [REDACTED] (b) (4) for drug CGMP. Satisfactory resolution of these deficiencies is required before this application may be approved.

PRESCRIBING INFORMATION

We acknowledge your email dated October 8, 2021 containing revised labeling. We reserve further comment on the proposed labeling until the application is otherwise adequate. We encourage you to review the labeling review resources on the Prescription Drug Labeling Resources¹ and Pregnancy and Lactation Labeling Final Rule² websites, including regulations and related guidance documents and the Selected Requirements for Prescribing Information (SRPI) – a checklist of important format items from labeling regulations and guidances. If you revise labeling, use the SRPI checklist

¹ <https://www.fda.gov/drugs/laws-acts-and-rules/prescription-drug-labeling-resources>

² <https://www.fda.gov/drugs/labeling-information-drug-products/pregnancy-and-lactation-labeling-drugs-final-rule>

to ensure that the Prescribing Information conforms with format items in regulations and guidances. Your response must include updated content of labeling [21 CFR 314.50(l)(1)(i)].

CARTON AND CONTAINER LABELING

We reserve further comment on the proposed labeling until the application is otherwise adequate.

PROPRIETARY NAME

Please refer to correspondence dated, June 17, 2021 which addresses the proposed proprietary name, Tyvaso DPI. This name was found acceptable pending approval of the application in the current review cycle. Please resubmit the proposed proprietary name when you respond to the application deficiencies.

SAFETY UPDATE

When you respond to the above deficiencies, include a safety update as described at 21 CFR 314.50(d)(5)(vi)(b). The safety update should include data from all nonclinical and clinical studies/trials of the product under consideration regardless of indication, dosage form, or dose level.

- (1) Describe in detail any significant changes or findings in the safety profile.
- (2) When assembling the sections describing discontinuations due to adverse events, serious adverse events, and common adverse events, incorporate new safety data as follows:
 - Present new safety data from the studies/clinical trials for the proposed indication using the same format as in the original submission.
 - Present tabulations of the new safety data combined with the original application data.
 - Include tables that compare frequencies of adverse events in the original application with the retabulated frequencies described in the bullet above.
 - For indications other than the proposed indication, provide separate tables for the frequencies of adverse events occurring in clinical trials.
- (3) Present a retabulation of the reasons for premature trial discontinuation by incorporating the drop-outs from the newly completed trials. Describe any new trends or patterns identified.

- (4) Provide case report forms and narrative summaries for each patient who died during a clinical trial or who did not complete a trial because of an adverse event. In addition, provide narrative summaries for serious adverse events.
- (5) Describe any information that suggests a substantial change in the incidence of common, but less serious, adverse events between the new data and the original application data.
- (6) Provide updated exposure information for the clinical studies/trials (e.g., number of subjects, person time).
- (7) Provide a summary of worldwide experience on the safety of this product. Include an updated estimate of use for product marketed in other countries.
- (8) Provide English translations of current approved foreign labeling not previously submitted.

OTHER

Within one year after the date of this letter, you are required to resubmit or take other actions available under 21 CFR 314.110. If you do not take one of these actions, we may consider your lack of response a request to withdraw the application under 21 CFR 314.65. You may also request an extension of time in which to resubmit the application.

A resubmission must fully address all the deficiencies listed in this letter and should be clearly marked with "**RESUBMISSION**" in large font, bolded type at the beginning of the cover letter of the submission. The cover letter should clearly state that you consider this resubmission a complete response to the deficiencies outlined in this letter. A partial response to this letter will not be processed as a resubmission and will not start a new review cycle.

You may request a meeting or teleconference with us to discuss what steps you need to take before the application may be approved. If you wish to have such a meeting, submit your meeting request as described in the draft guidance for industry *Formal Meetings Between the FDA and Sponsors or Applicants of PDUFA Products*.

The drug product may not be legally marketed until you have been notified in writing that this application is approved.

ADDITIONAL COMMENT

On July 8, 2021, Lassman Law + Policy submitted a citizen petition to FDA (Docket No. FDA-2021-P-0714) regarding the approvability of NDA 214324 for Tyvaso DPI. The issues raised by this petition are currently under review by the Agency, and FDA has not made a final decision on the issues the petition raises. The deficiency comments

included in this communication reflect only our current thinking, and this communication does not represent a final decision by the Agency on the issues raised in the pending citizen petition.

If you have any questions, please call Brian Cooney, Regulatory Project Manager, at (301) 796-0886.

Sincerely,

{See appended electronic signature page}

Norman Stockbridge, MD, PhD
Director
Division of Cardiology and Nephrology
Office of Cardiology, Hematology, Endocrinology,
and Nephrology
Office of New Drugs
Center for Drug Evaluation and Research

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/

NORMAN L STOCKBRIDGE
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