NDA 212121

NDA APPROVAL

CMP Development LLC
Attention: Ellen Barkley
Regulatory Affairs Manager
8026 US Highway 264A
Farmville, NC 27828

Dear Ms. Barkley:

Please refer to your new drug application (NDA) dated and received on March 19, 2019, submitted pursuant to section 505(b)(2) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Potassium Phosphates Injection, USP, phosphorus 3 mmol/mL and potassium 4.7 mEq/mL.

This new drug application provides for the use of Potassium Phosphates Injection, USP as a source of phosphorus:

- in intravenous fluids to correct hypophosphatemia in adults and pediatric patients 12 years of age and older when oral or enteral replacement is not possible, insufficient or contraindicated and
- for parenteral nutrition in adults weighing at least 45 kg and pediatric patients 12 years of age and older weighing at least 40 kg when oral or enteral nutrition is not possible, insufficient or contraindicated.

APPROVAL & LABELING

We have completed our review of this application. It is approved, effective on the date of this letter, for use as recommended in the enclosed agreed-upon labeling.

We note that your September 18, 2019, submission includes final printed labeling (FPL) for your Prescribing Information. We have not reviewed this FPL. You are responsible for assuring that the wording in this printed labeling is identical to that of the approved content of labeling in the structured product labeling (SPL) format.

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), 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 via publicly available labeling repositories.

CARTON AND CONTAINER LABELING

Submit final printed carton and container labeling that are identical to the enclosed carton and container labeling and carton and container labeling submitted on September 18, 2019, 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 NDA 212121." 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 in pediatric patients unless this requirement is waived, deferred, or inapplicable.

This product is appropriately labeled for use in ages 12 years of age and older for these indications. Therefore, no additional studies are needed in this pediatric group.

We are deferring the required pediatric assessment for patients less than 12 years of age for this application because no age-appropriate formulation exists for this pediatric subpopulation.

Your deferred pediatric study required under section 505B(a) of the Federal Food, Drug, and Cosmetic Act is required postmarketing study. The status of this postmarketing study must be reported annually according to 21 CFR 314.81 and section 505B(a)(4)(C) of the Federal Food, Drug, and Cosmetic Act. This required study listed below.

[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.

3714-2 Develop an age-appropriate formulation for Potassium Phosphates Injection, USP with acceptable aluminum content and weight-based dosing criteria to ensure accurate dosing for pediatric patients less than 12 years of age.

Final Report Submission: 12/20

Reports of this required pediatric postmarketing study 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.

POSTMARKETING COMMITMENTS NOT SUBJECT TO THE REPORTING REQUIREMENTS UNDER SECTION 506B

We remind you of your postmarketing commitment:

3714-1 Submit the assay results of the TPN admixture studies as proposed in the TPN Admixture Compatibility Stability Protocol.

The timetable you submitted on September 17, 2019, states that you will conduct this study according to the following schedule:

Final Report Submission: 10/19

Submit nonclinical and chemistry, manufacturing, and controls protocols and all postmarketing final reports to this NDA. In addition, under 21 CFR 314.81(b)(2)(vii) and 314.81(b)(2)(viii) you should include a status summary of each commitment in your annual report to this NDA. 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 entered into each study/trial. All submissions, including supplements, relating to these postmarketing commitments should be prominently labeled "**Postmarketing Commitment Final Report**," **or** "**Postmarketing Commitment Correspondence**."

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 Prescribing Information, Medication Guide, and Patient Package Insert (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 *Providing Regulatory Submissions in Electronic and Non-Electronic Format—Promotional Labeling and Advertising Materials for Human Prescription Drugs.*[3]

As required under 21 CFR 314.81(b)(3)(i), you must submit final promotional materials, and the Prescribing Information, at the time of initial dissemination or publication, accompanied by a Form FDA 2253. Form FDA 2253 is available at FDA.gov.[4] Information and Instructions for completing the form can be found at FDA.gov.[5] For more information about submission of promotional materials to the Office of Prescription Drug Promotion (OPDP), see FDA.gov.[6]

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, call CDR Andrew Nyabwari, Regulatory Project Manager, at (240) 402-0075.

Sincerely,

{See appended electronic signature page}

Lisa M. Soule, M.D.,
Associate Director
Division of Gastroenterology and Inborn
Office of Drug Evaluation III
Center for Drug Evaluation and Research

[3] When final, this guidance will represent the FDA's current thinking on this topic. For the most recent version of a guidance, check the FDA guidance web page at https://www.fda.gov/RegulatoryInformation/Guidances/default.htm.
[4] http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083570.pdf
[5] http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf
[6] http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm

ENCLOSURE(S):

- Content of Labeling
  - Prescribing Information
  - Carton and Container Labeling

U.S. Food and Drug Administration
Silver Spring, MD 20993
www.fda.gov

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/

LISA M SOULE
09/19/2019 04:40:28 PM