

**MEMORANDUM**

**Department of Health and Human Services  
Public Health Service  
Food and Drug Administration  
Center for Biologics Evaluation and Research**

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**Date:** August 18, 2016

**From:** Alpita Popat, Pharm.D., MBA  
Consumer Safety Officer  
Advertising and Promotional Labeling Branch (APLB) (HFM-602)  
Division of Case Management

**Through:** Lisa L. Stockbridge, Ph.D.  
Branch Chief  
Advertising and Promotional Labeling Branch (APLB) (HFM-602)  
Division of Case Management

**To:** Laurence Landow, Medical Officer, CBER/OBRR/DH  
Thomas Maruna, RPM, CBER/OBRR/DBA/RPMB

**Subject:** Review of proposed proprietary name **CUVITRU (Immune Globulin Subcutaneous (Human), 20% Solution)**  
**Sponsor: Baxalta USA Inc**  
**BLA: 125596/0**

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**Background:** The sponsor submitted:

New Approval  
 Changes Being Effectuated (CBE) supplement  
 Prior Approval Supplement (PAS) Amendment  
 Major Amendment

Submission contains:

Prescribing Information (PI)  
 Patient Package Insert (PPI)  
 Carton and/or container labels  
 Other

Submission Date: September 14, 2016

PDUFA action Date: September 13, 2016

On September 14, 2015, Baxalta US, Inc. submitted an original Biologics License Application (BLA) for CUVITRU (Immune Globulin Subcutaneous (Human), 20% Solution) indicated for the treatment of primary immune deficiency disorders associated with defects in humoral immunity.

The manufacturing process for IGSC, 20% utilizes almost the same manufacturing process steps as the currently licensed Immune Globulin Infusion, (Human), 10% [IGI, 10%, STN 125105] with the exception of the (b) (4) and formulation steps. The concentration of this product is 20% rather than 10% and the route of administration is only subcutaneous.

APLB reviewed the proposed labeling submitted on April 22, 2016 and the Medical Officer's review from June 15, 2015, and has the following additional comments from a promotional and comprehension perspective.

### **HIGHLIGHTS**

In the **BOXED WARNING**, we recommend listing each concept under a separate bullet to make the information more visually accessible. For example:

- Thrombosis may occur with immune globulin products, including CUVITRU. Risk factors include: advanced age, prolonged immobilization, hypercoagulable conditions, history of venous or arterial thrombosis, use of estrogens, indwelling vascular catheters, hyperviscosity and cardiovascular risk factors.
- For patients at risk of thrombosis, administer CUVITRU at the minimum dose and infusion rate practicable. Ensure adequate hydration in patients before administration.
- Monitor for signs and symptoms of thrombosis and assess blood viscosity in patients at risk of hyperviscosity.

### **FULL PRESCRIBING INFORMATION**

- In the **BOXED WARNING**, we recommend listing each concept under a separate bullet to make the information more visually accessible. For example:
  - Thrombosis may occur with immune globulin products, including CUVITRU. Risk factors include: advanced age, prolonged immobilization, hypercoagulable conditions, history of venous or arterial thrombosis, use of estrogens, indwelling vascular catheters, hyperviscosity and cardiovascular risk factors.
  - For patients at risk of thrombosis, administer CUVITRU at the minimum dose and infusion rate practicable. Ensure adequate hydration in patients before administration.
  - Monitor for signs and symptoms of thrombosis and assess blood viscosity in patients at risk of hyperviscosity.

**CUVITRU (Immune Globulin Subcutaneous (Human), 20% Solution)**  
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- In the **6 ADVERSE REACTIONS** and **14 CLINICAL STUDIES** sections, please avoid arbitrary categories of “mild,” “moderate,” and “severe” that to not established definitions.

**CONTAINER LABEL**

APLB has no objections to the container label.

**PACKAGE LABEL**

Please add the lot number or other lot identification and the expiration date to the package label.

**CUVITRU (Immune Globulin Subcutaneous (Human), 20% Solution)  
BLA: 125596/0**

Firm name: Baxter Healthcare Corporation

File name: LR\_Cuvitru\_2016 07 19\_125596\_0.doc

History

Prepared: Alpita Popat 8/18/16  
Concur w/rev: Lisa Stockbridge 8/18/16  
Final: Alpita Popat 8/18/16

Bcc: HFM-602 Lisa Stockbridge  
HFM-602 Chron File  
HFD-602 APLB Files

Concurrence box:

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