NDA 20-905/S-014 Page 5

- 1 Rev. November 2004
- 2 **ARAVA®** Tablets
- 3 (leflunomide)
- 4 **10 mg, 20 mg, 100 mg**

Rx only

5 6

7

8 9

CONTRAINDICATIONS AND WARNINGS

PREGNANCY MUST BE EXCLUDED BEFORE THE START OF TREATMENT WITH ARAVA. ARAVA IS CONTRAINDICATED IN PREGNANT WOMEN, OR WOMEN OF CHILDBEARING POTENTIAL WHO ARE NOT USING RELIABLE CONTRACEPTION. (SEE CONTRAINDICATIONS AND WARNINGS.) PREGNANCY MUST BE AVOIDED DURING ARAVA TREATMENT OR PRIOR TO THE COMPLETION OF THE DRUG ELIMINATION PROCEDURE AFTER ARAVA TREATMENT.

DESCRIPTION

ARAVA[®] (leflunomide) is a pyrimidine synthesis inhibitor. The chemical name for leflunomide is N-(4'-trifluoromethylphenyl)-5-methylisoxazole-4-carboxamide. It has an empirical formula $C_{12}H_9F_3N_2O_2$, a molecular weight of 270.2 and the following structural formula:

23 24

17 18

19

25



26 27

33 34

35

ARAVA is available for oral administration as tablets containing 10, 20, or 100 mg of active
drug. Combined with leflunomide are the following inactive ingredients: colloidal silicon
dioxide, crospovidone, hypromellose, lactose monohydrate, magnesium stearate, polyethylene
glycol, povidone, starch, talc, titanium dioxide, and yellow ferric oxide (20 mg tablet only).

CLINICAL PHARMACOLOGY

36 Mechanism of Action

- 37 Leflunomide is an isoxazole immunomodulatory agent which inhibits dihydroorotate
- 38 dehydrogenase (an enzyme involved in de novo pyrimidine synthesis) and has antiproliferative
- 39 activity. Several *in vivo* and *in vitro* experimental models have demonstrated an anti-
- 40 inflammatory effect.
- 41 **Pharmacokinetics**

NDA 20-905/S-014 Page 6

42 Following oral administration, leflunomide is metabolized to an active metabolite A77 1726

- 43 (hereafter referred to as M1) which is responsible for essentially all of its activity *in vivo*.
- 44 Plasma levels of leflunomide are occasionally seen, at very low levels. Studies of the
- 45 pharmacokinetics of leflunomide have primarily examined the plasma concentrations of this
- 46 active metabolite.
- 47
- 48

49



A77 1726 (M1)

50 Absorption

Following oral administration, peak levels of the active metabolite, M1, occurred between 6 - 12 hours after dosing. Due to the very long half-life of M1 (~2 weeks), a loading dose of 100 mg for 3 days was used in clinical studies to facilitate the rapid attainment of steady-state levels of M1. Without a loading dose, it is estimated that attainment of steady-state plasma concentrations would require nearly two months of dosing. The resulting plasma concentrations following both loading doses and continued clinical dosing indicate that M1 plasma levels are dose proportional.

and 25 mg/day for 24 V (Study YU204)	Weeks to Patients (n=54) w	er Administration of Leflunom ith Rheumatoid Arthritis (Mea	
Maintenance (Loading)	Dose		
Parameter	5 mg (50 mg)	10 mg (100 mg)	25 mg (100 mg)
$\begin{array}{ccc} C_{24} & (Day & 1) \\ (\mu g/mL)^1 \end{array}$	4.0 ± 0.6	8.4 ± 2.1	8.5 ± 2.2
$\begin{array}{c}C_{24} \qquad (ss)\\ \left(\mu g/mL\right)^2\end{array}$	8.8 ± 2.9	18 ± 9.6	63 ± 36
T _{1/2} (DAYS)	15 ± 3	14 ± 5	18±9

¹ Concentration at 24 hours after loading dose

² Concentration at 24 hours after maintenance doses at steady state

58 Relative to an oral solution, ARAVA tablets are 80% bioavailable. Co-administration of

59 leflunomide tablets with a high fat meal did not have a significant impact on M1 plasma levels.

60 **Distribution**

- 61 M1 has a low volume of distribution (Vss = 0.13 L/kg) and is extensively bound (>99.3%) to
- albumin in healthy subjects. Protein binding has been shown to be linear at therapeutic
- 63 concentrations. The free fraction of M1 is slightly higher in patients with rheumatoid arthritis
- and approximately doubled in patients with chronic renal failure; the mechanism and
- 65 significance of these increases are unknown.

66 Metabolism

- 67 Leflunomide is metabolized to one primary (M1) and many minor metabolites. Of these minor
- 68 metabolites, only 4-trifluoromethylaniline (TFMA) is quantifiable, occurring at low levels in the
- 69 plasma of some patients. The parent compound is rarely detectable in plasma. At the present time

- 70 the specific site of leflunomide metabolism is unknown. *In vivo* and *in vitro* studies suggest a
- 71 role for both the GI wall and the liver in drug metabolism. No specific enzyme has been
- identified as the primary route of metabolism for leflunomide; however, hepatic cytosolic and
- 73 microsomal cellular fractions have been identified as sites of drug metabolism.

74 *Elimination*

- 75 The active metabolite M1 is eliminated by further metabolism and subsequent renal excretion as
- 76 well as by direct biliary excretion. In a 28 day study of drug elimination (n=3) using a single
- dose of radiolabeled compound, approximately 43% of the total radioactivity was eliminated in
- the urine and 48% was eliminated in the feces. Subsequent analysis of the samples revealed the
- primary urinary metabolites to be leflunomide glucuronides and an oxanilic acid derivative of
 M1. The primary fecal metabolite was M1. Of these two routes of elimination, renal elimination
- 81 is more significant over the first 96 hours after which fecal elimination begins to predominate. In
- a study involving the intravenous administration of M1, the clearance was estimated to be
- 83 31 mL/hr.
- 84 In small studies using activated charcoal (n=1) or cholestyramine (n=3) to facilitate drug
- elimination, the *in vivo* plasma half-life of M1 was reduced from >1 week to approximately 1
- 86 day (see **PRECAUTIONS General Need for Drug Elimination**). Similar reductions in
- 87 plasma half-life were observed for a series of volunteers (n=96) enrolled in pharmacokinetic
- trials who were given cholestyramine. This suggests that biliary recycling is a major contributor
- to the long elimination half-life of M1. Studies with both hemodialysis and CAPD (chronic
- 90 ambulatory peritoneal dialysis) indicate that M1 is not dialyzable.

91 Special Populations

- *Gender*. Gender has not been shown to cause a consistent change in the *in vivo* pharmacokinetics
 of M1.
- 94 *Age.* Age has been shown to cause a change in the *in vivo* pharmacokinetics of M1 (see

95 CLINICAL PHARMACOLOGY – Special Populations - *Pediatrics*).

- 96 *Smoking*. A population based pharmacokinetic analysis of the phase III data indicates that
- 97 smokers have a 38% increase in clearance over non-smokers; however, no difference in clinical
 98 efficacy was seen between smokers and nonsmokers.
- 99 *Chronic Renal Insufficiency.* In single dose studies in patients (n=6) with chronic renal
- 100 insufficiency requiring either chronic ambulatory peritoneal dialysis (CAPD) or hemodialysis,
- 101 neither had a significant impact on circulating levels of M1. The free fraction of M1 was almost
- doubled, but the mechanism of this increase is not known. In light of the fact that the kidney
- plays a role in drug elimination and without adequate studies of leflunomide use in subjects with
- renal insufficiency, caution should be used when ARAVA is administered to these patients.
- 105 *Hepatic Insufficiency*. Studies of the effect of hepatic insufficiency on M1 pharmacokinetics
- 106 have not been done. Given the need to metabolize leflunomide into the active species, the role of
- 107 the liver in drug elimination/recycling, and the possible risk of increased hepatic toxicity, the use
- 108 of leflunomide in patients with hepatic insufficiency is not recommended.
- 109 *Pediatrics*
- 110 The pharmacokinetics of M1 following oral administration of leflunomide have been
- 111 investigated in 73 pediatric patients with polyarticular course Juvenile Rheumatoid Arthritis
- 112 (JRA) who ranged in age from 3 to 17 years. The results of a population pharmacokinetic
- analysis of these trials have demonstrated that pediatric patients with body weights \leq 40 kg have
- a reduced clearance of M1 (see Table 2) relative to adult rheumatoid arthritis patients.

Table 2: Population Pharmacokinetic Estimate of M1 Clearance Following OralAdministration of Leflunomide in Pediatric Patients with Polyarticular Course JRAMean ±SD [Range]				
N	Body Weight (kg)	CL (mL/h)		
10	<20	18 ± 9.8 [6.8-37]		
30	20-40	18 ± 9.5 [4.2-43]		
33	>40	26 ± 16 [9.7-93.6]		

116117 *Drug Interactions*

- *In vivo* drug interaction studies have demonstrated a lack of a significant drug interaction
 between leflunomide and tri-phasic oral contraceptives, and cimetidine.
- 120 In vitro studies of protein binding indicated that warfarin did not affect M1 protein binding. At
- 121 the same time M1 was shown to cause increases ranging from 13 50% in the free fraction of
- 122 diclofenac, ibuprofen and tolbutamide at concentrations in the clinical range. *In vitro* studies of
- drug metabolism indicate that M1 inhibits CYP 450 2C9, which is responsible for the
- 124 metabolism of phenytoin, tolbutamide, warfarin and many NSAIDs. M1 has been shown to
- inhibit the formation of 4'-hydroxydiclofenac from diclofenac *in vitro*. The clinical significance
- 126 of these findings with regard to phenytoin and tolbutamide is unknown; however, there was 127 extensive concomitant use of NSAIDs in the clinical studies and no differential effect was
- 128 observed. (see **PRECAUTIONS Drug Interactions**).
- 129 *Methotrexate.* Coadministration, in 30 patients, of ARAVA (100 mg/day x 2 days followed by
- 130 10 20 mg/day) with methotrexate (10 25 mg/week, with folate) demonstrated no
- 131 pharmacokinetic interaction between the two drugs. However, co-administration increased risk
- 132 of hepatotoxicity (see **PRECAUTIONS Drug Interactions–Hepatotoxic Drugs**).
- 133 *Rifampin.* Following concomitant administration of a single dose of ARAVA to subjects
- receiving multiple doses of rifampin, M1 peak levels were increased (~40%) over those seen
- 135 when ARAVA was given alone. Because of the potential for ARAVA levels to continue to
- increase with multiple dosing, caution should be used if patients are to receive both ARAVA and
 rifampin.

CLINICAL STUDIES

141 **A. ADULTS**

139

140

146

- The efficacy of ARAVA in the treatment of rheumatoid arthritis (RA) was demonstrated in three
 controlled trials showing reduction in signs and symptoms, and inhibition of structural damage.
 In two placebo controlled trials, efficacy was demonstrated for improvement in physical
 function.
- 147 1. Reduction of signs and symptoms

Relief of signs and symptoms was assessed using the American College of Rheumatology 148 149 (ACR)20 Responder Index, a composite of clinical, laboratory, and functional measures in rheumatoid arthritis. An "ACR20 Responder" is a patient who had $\geq 20\%$ improvement in both 150 tender and swollen joint counts and in 3 of the following 5 criteria: physician global assessment, 151 patient global assessment, functional ability measure [Modified Health Assessment 152 153 Questionnaire (MHAQ)], visual analog pain scale, and erythrocyte sedimentation rate or C-reactive protein. An "ACR20 Responder at Endpoint" is a patient who completed the study 154 and was an ACR20 Responder at the completion of the study. 155

157 2. Inhibition of structural damage

- 158 Inhibition of structural damage compared to control was assessed using the Sharp Score (Sharp,
- 159 JT. Scoring Radiographic Abnormalities in Rheumatoid Arthritis, Radiologic Clinics of North 160 America, 1996; vol. 34, pp. 233-241), a composite score of X-ray erosions and joint space 161 narrowing in hands/wrists and forefeet.

163 **3.** Improvement in physical function

- 164 Improvement in physical function was assessed using the Health Assessment Questionnaire 165 (HAQ) and the Medical Outcomes Survey Short Form (SF-36).
- 166

169

162

156

In all Arava monotherapy studies, an initial loading dose of 100 mg per day for three days onlywas used followed by 20 mg per day thereafter.

170 US301 Clinical Trial in Adults

- 171 Study US301, a 2 year study, randomized 482 patients with active RA of at least 6 months
- duration to leflunomide 20 mg/day (n=182), methotrexate 7.5 mg/week increasing to
- 173 15 mg/week (n=182), or placebo (n=118). All patients received folate 1 mg BID. Primary
- analysis was at 52 weeks with blinded treatment to 104 weeks.
- Overall, 235 of the 508 randomized treated patients (482 in primary data analysis and an additional 26 patients), continued into a second 12 months of double-blind treatment (98 leflunomide, 101 methotrexate, 36 placebo). Leflunomide dose continued at 20 mg/day and the methotrexate dose could be increased to a maximum of 20 mg/week. In total, 190 patients (83 leflunomide, 80 methotrexate, 27 placebo) completed 2 years of double-blind treatment.
- 180181 The rate and reason for withdrawal is summarized in Table 3.
- 182

	Та	ble 3: Withdrav	vals in US	301		
			n(%) patients		
	Le	flunomide		Placebo	Me	thotrexate
		190		128		190
Withdrawals in Year-1						
			7		5	
Lack of efficacy	33	(17.4)	0	(54.7)	0	(26.3)
			1		2	
Safety	44	(23.2)	2	(9.4)	2	(11.6)
4			1		1	
Other ¹	15	(7.9)	0	(7.8)	7	(9.0)
			9		8	
Total	92	(48.4)	2	(71.9)	9	(46.8)
Patients entering Year 2		98		36		101
Withdrawals in Year-2						
Lack of efficacy	4	(4.1)	1	(2.8)	4	(4.0)
Safety	8	(8.2)	0	(0.0)	10	(9.9)
Other ¹	3	(3.1)	8	(22.2)	7	(6.9)
Total	15	5 (15.3)	9	(25.0)	21	(20.8)

186 MN301/303/305 Clinical Trial in Adults

187 Study MN301 randomized 358 patients with active RA to leflunomide 20 mg/day (n=133), 188 sulfasalazine 2.0 g/day (n=133), or placebo (n=92). Treatment duration was 24 weeks. An 189 extension of the study was an optional 6-month blinded continuation of MN301 without the 190 placebo arm, resulting in a 12-month comparison of leflunomide and sulfasalazine (study 191 MN303).

- 192 Of the 168 patients who completed 12 months of treatment in MN301 and MN303, 146 patients 193 (87%) entered a 1-year extension study of double blind active treatment (MN305;
- 194 60 leflunomide, 60 sulfasalazine, 26 placebo/ sulfasalazine). Patients continued on the same
- daily dosage of leflunomide or sulfasalazine that they had been taking at the completion of
- 196 MN301/303. A total of 121 patients (53 leflunomide, 47 sulfasalazine, 21 placebo/sulfasalazine)
- 197 completed the 2 years of double-blind treatment.
- 198 Patient withdrawal data in MN301/303/305 is summarized in Table 4.
- 199 200

185

			n(%)) patients		
	Lef	lunomide		acebo	Sulfa	asalazine
		133		92		133
Withdrawals in MN301 (Mo 0-6)						
	1					
Lack of efficacy	0 1	(7.5)	29	(31.5)	14	(10.5)
Safety	9	(14.3)	6	(6.5)	25	(18.8)
Other ¹	8	(6.0)	6	(6.5)	11	(8.3)
	3					
Total	7	(27.8)	41	(44.6)	50	(37.6)
Patients entering						
MN303		80				76
Withdrawals in MN303 (Mo 7-12)						
Lack of efficacy	4	(5.0)			2	(2.6)
Safety	2	(2.5)			5	(6.6)
Other ¹	3	(3.8)			1	(1.3)
Total	9	(11.3)			8	(10.5)
Patients entering MN305		60				60
Withdrawals in MN305 (Mo 13-24)					
Lack of efficacy	, 0	(0.0)			3	(5.0)
Safety	6	(10.0)			8	(13.3)
Other ¹	1	(1.7)			2	(3.3)
Total	7	(11.7)			13	(21.7)

Table 4: Withdrawals in study MN301/303/305

¹ Includes: lost to follow up, protocol violation, noncompliance, voluntary withdrawal, investigator discretion.

 <sup>183
 &</sup>lt;sup>1</sup> Includes: lost to follow up, protocol violation, noncompliance, voluntary withdrawal, investigator discretion.

203 MN302/304 Clinical Trial in Adults

Study MN302 randomized 999 patients with active RA to leflunomide 20 mg/day (n=501) or methotrexate at 7.5 mg/week increasing to 15 mg/week (n=498). Folate supplementation was used in 10% of patients. Treatment duration was 52 weeks.

Of the 736 patients who completed 52 weeks of treatment in study MN302, 612 (83%) entered the double-blind, 1-year extension study MN304 (292 leflunomide, 320 methotrexate). Patients continued on the same daily dosage of leflunomide or methotrexate that they had been taking at the completion of MN302. There were 533 patients (256 leflunomide, 277 methotrexate) who completed 2 years of double-blind treatment.

212

213 Patient withdrawal data in MN302/304 is summarized in Table 5.

214

	n(%) patients			
	Lefl	unomide	Met	hotrexate
		501		498
Withdrawals in MN302 (Year-1)				
Lack of efficacy	37	(7.4)	15	(3.0)
Safety	98	(19.6)	79	(15.9)
Other ¹	17	(3.4)	17	(3.4)
Total	152	(30.3)	111	(22.3)
Patients entering MN304		292		320
Withdrawals in MN304 (Year-2)				
Lack of efficacy	13	(4.5)	9	(2.8)
Safety	11	(3.8)	22	(6.9)
Other ¹	12	(4.1)	12	(3.8)
Total	36	(12.3)	43	(13.4)

215 216

217

¹ Includes: lost to follow up, protocol violation, noncompliance, voluntary withdrawal, investigator discretion.

218 Clinical Trial Data

219 1. Signs and symptoms Rheumatoid Arthritis

The ACR20 Responder at Endpoint rates are shown in Figure 1. ARAVA was statistically
 significantly superior to placebo in reducing the signs and symptoms of RA by the primary
 efficacy analysis, ACR20 Responder at Endpoint, in study US301 (at the primary 12 months)

endpoint) and MN301 (at 6 month endpoint). ACR20 Responder at Endpoint at Endp

treatment were consistent across the 6 and 12 month studies (41 - 49%). No consistent

- differences were demonstrated between leflunomide and methotrexate or between leflunomide
- and sulfasalazine. ARAVA treatment effect was evident by 1 month, stabilized by 3 6 months,
- and continued throughout the course of treatment as shown in Figure 2.
- 228





% ACR 20 Responder at Endpoint



	Comparisons	95%Confidence	p Value
		Interval	
US301	Leflunomide vs. Placebo	(12, 32)	< 0.0001
	Methotrexate vs. Placebo	(8, 30)	< 0.0001
	Leflunomide vs.	(-4, 16)	NS
	Methotrexate		
MN301	Leflunomide vs. Placebo	(7, 33)	0.0026
	Sulfasalazine vs. Placebo	(4, 29)	0.0121
	Leflunomide vs. Sulfasalazine	(-8, 16)	NS
MN302	Leflunomide vs. Methotrexate	(-19, -7)	< 0.0001

Figure 2





ACR50 and ACR70 Responders are defined in an analogous manner to the ACR 20 Responder,
but use improvements of 50% or 70%, respectively (Table 6). Mean change for the individual
components of the ACR Responder Index are shown in Table 7.

241

Table 6. Summary of ACR Response R	ates*		
Study and Treatment Group	ACR20	ACR50	ACR70
Placebo-Controlled Studies			
US301 (12 months)			
Leflunomide $(n=178)^{\dagger}$	52.2 [‡]	34.3 [‡]	20.2 [‡]
Placebo (n=118) [†]	26.3	7.6	4.2
Methotrexate $(n=180)^{\dagger}$	45.6	22.8	9.4
MN301(6 months)			
Leflunomide $(n=130)^{\dagger}$	54.6 [‡]	33.1 [‡]	10.0§
Placebo $(n=91)^{\dagger}$	28.6	14.3	2.2
Sulfasalazine $(n=132)^{\dagger}$	56.8	30.3	7.6
Non-Placebo Active-Controlled			
Studies			
MN302 (12 months)			
Leflunomide (n=495) [†]	51.1	31.1	9.9
Methotrexate $(n=489)^{\dagger}$	65.2	43.8	16.4

* Intent to treat (ITT) analysis using last observation carried forward (LOCF) technique for patients who discontinued early.

[†] N is the number of ITT patients for whom adequate data were available to calculate the indicated rates.

[‡] p<0.001 leflunomide vs placebo [§] p<0.02 leflunomide vs placebo

[°] p<0.02 leftunomide vs placebo

242

Table 7 shows the results of the components of the ACR response criteria for US301, MN301,
and MN302. ARAVA was significantly superior to placebo in all components of the ACR
Response criteria in study US301 and MN301. In addition, Arava was significantly superior to
placebo in improving morning stiffness, a measure of RA disease activity, not included in the
ACR Response criteria. No consistent differences were demonstrated between ARAVA and the
active comparators.

Components		Placebo-Controlled Studies						Non-placebo Controlled Study		
		US301		Mì	V301 Non-U	JS	MN302 Non-US			
	([12 months]			(6 months)		(12 months)			
	Leflu-	Metho-	Placebo	Leflu-	Sulfa-	Placebo	Leflu-	Metho-		
	nomide	trexate		nomide	salazine		nomide	trexate		
Tender joint count ¹	-7.7	-6.6	-3.0	-9.7	-8.1	-4.3	-8.3	-9.7		
Swollen joint count ¹	-5.7	-5.4	-2.9	-7.2	-6.2	-3.4	-6.8	-9.0		
Patient global assessment ²	-2.1	-1.5	0.1	-2.8	-2.6	-0.9	-2.3	-3.0		
Physician global assessment ²	-2.8	-2.4	-1.0	-2.7	-2.5	-0.8	-2.3	-3.1		
Physical function/disabilit y (MHAQ/HAQ)	-0.29	-0.15	0.07	-0.50	-0.29	-0.04	-0.37	-0.44		
Pain intensity ²	-2.2	-1.7	-0.5	-2.7	-2.0	-0.9	-2.1	-2.9		
Erythrocyte Sedimentation rate	-6.26	-6.48	2.56	-7.48	-16.56	3.44	-10.12	-22.18		
C-reactive protein	-0.62	-0.50	0.47	-2.26	-1.19	0.16	-1.86	-2.45		
ot included in the ACR R	Responder I	ndex								
Morning Stiffness (min)	-101.4	-88.7	14.7	-93.0	-42.4	-6.8	-63.7	-86.6		
(min) * Last Observation Ca 1 Based on 28 joint co 2 Visual Analog Scale	ount		e Change I	ndicates Im	provement					

250

251 Maintenance of effect

252 After completing 12 months of treatment, patients continuing on study treatment were evaluated for an additional 12 months of double-blind treatment (total treatment period of 2 years) in 253 studies US301, MN305, and MN304. ACR Responder rates at 12 months were maintained over 254 2 years in most patients continuing a second year of treatment. 255

Improvement from baseline in the individual components of the ACR responder criteria was also 256 sustained in most patients during the second year of Arava treatment in all three trials. 257

258 259 2.

260

Inhibition of structural damage

261 The change from baseline to endpoint in progression of structural disease, as measured by the Sharp X-ray score, is displayed in Figure 3. ARAVA was statistically significantly superior to 262 placebo in inhibiting the progression of disease by the Sharp Score. No consistent differences 263 were demonstrated between leflunomide and methotrexate or between leflunomide and 264 265 sulfasalazine.

NDA 20-905/S-014 Page 15





268 269 270 271

L= Leflunomide; M=methotrexate;	S=sulfasalazine; P=placebo
---------------------------------	----------------------------

	Comparisons	95% Confidence Interval	p Value
US301	Leflunomide vs. Placebo	(-4.0, -1.1)	0.0007
	Methotrexate vs. Placebo	(-2.6, -0.2)	0.0196
	Leflunomide vs. Methotrexate	(-2.3, 0.0)	0.0499
MN301	Leflunomide vs. Placebo	(-6.2, -1.8)	0.0004
	Sulfasalazine vs. Placebo	(-6.9, 0.0)	0.0484
	Leflunomide vs. Sulfasalazine	(-3.3, 1.2)	NS
MN302	Leflunomide vs. Methotrexate	(-2.2, 7.4)	NS

272

273

274 **3.** Improvement in physical function

The Health Assessment Questionnaire (HAQ) assesses a patient's physical function and degree
of disability. The mean change from baseline in functional ability as measured by the HAQ
Disability Index (HAQ DI) in the 6 and 12 month placebo and active controlled trials is shown in
Figure 4. ARAVA was statistically significantly superior to placebo in improving physical
function. Superiority to placebo was demonstrated consistently across all eight HAQ DI
subscales (dressing, arising, eating, walking, hygiene, reach, grip and activities) in both placebo
controlled studies.

- 281 controlled str 282
- 283 The Medical Outcomes Survey Short Form 36 (SF-36), a generic health-related quality of life
- 284 questionnaire, further addresses physical function. In US301, at 12 months, ARAVA provided
- statistically significant improvements compared to placebo in the Physical Component Summary
- 286 (PCS) Score.

Figure 4



Change in Functional Ability Measure*

L=Leflunomide, M=Methotrexate, P=Placebo, S=Sulfasalazine

291

287 288

	Comparison	95% Confidence Interval	p Value
US301	Leflunomide vs. Placebo	(-0.58, -0.29)	0.0001
	Leflunomide vs. Methotrexate	(-0.34, -0.07)	0.0026
MN301	Leflunomide vs. Placebo	(-0.67, -0.36)	< 0.0001
	Leflunomide vs. Sulfasalazine	(-0.33, -0.03)	0.0163
MN302	Leflunomide vs. Methotrexate	(0.01, 0.16)	0.0221

292 Maintenance of effect

293 The improvement in physical function demonstrated at 6 and 12 months was maintained over 294 two years. In those patients continuing therapy for a second year, this improvement in physical 295 function as measured by HAQ and SF-36 (PCS) was maintained.

297 PEDIATRICS **B**.

298

296

299 **Clinical Trials in Pediatrics**

300 ARAVA was studied in a single multicenter, double-blind, active-controlled trial in 94 patients 301 (1:1 randomization) with polyarticular course juvenile rheumatoid arthritis (JRA) as defined by 302 the American College of Rheumatology (ACR). Approximately 68% of pediatric patients 303 receiving ARAVA, versus 89% of pediatric patients receiving the active comparator, improved by Week 16 (end-of-study) employing the JRA Definition of Improvement (DOI) \ge 30 % 304 305 responder endpoint. In this trial, the loading dose and maintenance dose of ARAVA was based 306 on three weight categories: <20 kg, 20-40kg, and >40 kg. The response rate to ARAVA in pediatric patients ≤ 40 kg was less robust than in pediatric patients ≥ 40 kg suggesting suboptimal 307 308 dosing in smaller weight pediatric patients, as studied, resulting in less than efficacious plasma 309 concentrations, despite reduced clearance of M1. (See Pharmacokinetics).

310		
311		INDICATIONS AND USAGE
312		
313		ARAVA is indicated in adults for the treatment of active rheumatoid arthritis (RA):
314	1.	to reduce signs and symptoms
315	2.	to inhibit structural damage as evidenced by X-ray erosions and joint space narrowing
316	3.	to improve physical function.
317		(see CLINICAL STUDIES)
318		
319		Aspirin, nonsteroidal anti-inflammatory agents and/or low dose corticosteroids may be continued
320		during treatment with ARAVA (see PRECAUTIONS – Drug Interactions – NSAIDs). The
321		combined use of ARAVA with antimalarials, intramuscular or oral gold, D penicillamine,
322		azathioprine, or methotrexate has not been adequately studied (see WARNINGS -
323		Immunosuppression Potential/Bone Marrow Suppression).
324		
325		CONTRAINDICATIONS
326		
327		ARAVA is contraindicated in patients with known hypersensitivity to leflunomide or any of the
328		other components of ARAVA.
329		ARAVA can cause fetal harm when administered to a pregnant woman. Leflunomide, when
330		administered orally to rats during organogenesis at a dose of 15 mg/kg, was teratogenic (most
331		notably anophthalmia or microophthalmia and internal hydrocephalus). The systemic exposure
332		of rats at this dose was approximately 1/10 the human exposure level based on AUC. Under
333		these exposure conditions, leflunomide also caused a decrease in the maternal body weight and
334		an increase in embryolethality with a decrease in fetal body weight for surviving fetuses. In
335		rabbits, oral treatment with 10 mg/kg of leflunomide during organogenesis resulted in fused,
336 337		dysplastic sternebrae. The exposure level at this dose was essentially equivalent to the maximum human exposure level based on AUC. At a 1 mg/kg dose, leflunomide was not teratogenic in rats
338		and rabbits.
339		When female rats were treated with 1.25 mg/kg of leflunomide beginning 14 days before mating
340		and continuing until the end of lactation, the offspring exhibited marked (greater than 90%)
341		decreases in postnatal survival. The systemic exposure level at 1.25 mg/kg was approximately
342		1/100 the human exposure level based on AUC.
343		ARAVA is contraindicated in women who are or may become pregnant. If this drug is used
344		during pregnancy, or if the patient becomes pregnant while taking this drug, the patient should be
345		apprised of the potential hazard to the fetus.
346		
347		WARNINGS
348		
349		Immunosuppression Potential/Bone Marrow Suppression
350		ARAVA is not recommended for patients with severe immunodeficiency, bone marrow
351		dysplasia, or severe, uncontrolled infections. In the event that a serious infection occurs, it may
352		be necessary to interrupt therapy with ARAVA and administer cholestyramine or charcoal (see
353		PRECAUTIONS – General – Need for Drug Elimination). Medications like leflunomide that
354		have immunosuppression potential may cause patients to be more susceptible to infections,
355		including opportunistic infections. Rarely, severe infections including sepsis, which may be fatal,
356		have been reported in patients receiving ARAVA. Most of the reports were confounded by

- 357 concomitant immunosuppressant therapy and/or comorbid illness which, in addition to
- 358 rheumatoid disease, may predispose patients to infection.
- 359 There have been rare reports of pancytopenia, agranulocytosis and thrombocytopenia in patients
- receiving ARAVA alone. These events have been reported most frequently in patients who 360
- 361 received concomitant treatment with methotrexate or other immunosuppressive agents, or who
- 362 had recently discontinued these therapies; in some cases, patients had a prior history of a
- significant hematologic abnormality. 363
- Patients taking ARAVA should have platelet, white blood cell count and hemoglobin or 364
- hematocrit monitored at baseline and monthly for six months following initiation of therapy and 365 366 every 6- to 8 weeks thereafter. If used with concomitant methotrexate and/or other potential
- 367 immunosuppressive agents, chronic monitoring should be monthly. If evidence of bone marrow
- 368 suppression occurs in a patient taking ARAVA, treatment with ARAVA should be stopped, and
- cholestyramine or charcoal should be used to reduce the plasma concentration of leflunomide 369
- 370 active metabolite (see **PRECAUTIONS** – General – Need for Drug Elimination).
- In any situation in which the decision is made to switch from ARAVA to another anti-rheumatic 371
- 372 agent with a known potential for hematologic suppression, it would be prudent to monitor for
- 373 hematologic toxicity, because there will be overlap of systemic exposure to both compounds.
- 374 ARAVA washout with cholestyramine or charcoal may decrease this risk, but also may induce
- 375 disease worsening if the patient had been responding to ARAVA treatment.

376 Hepatotoxicity

- 377 RARE CASES OF SEVERE LIVER INJURY, INCLUDING CASES WITH FATAL
- 378 **OUTCOME, HAVE BEEN REPORTED DURING TREATMENT WITH**
- 379 **LEFLUNOMIDE. MOST CASES OF SEVERE LIVER INJURY OCCUR WITHIN 6**
- 380 MONTHS OF THERAPY AND IN A SETTING OF MULTIPLE RISK FACTORS FOR
- 381 HEPATOTOXICITY (liver disease, other hepatotoxins). (See PRECAUTIONS).
- At minimum, ALT (SGPT) must be performed at baseline and monitored initially at monthly 382 intervals during the first six months then, if stable, every 6 to 8 weeks thereafter. In addition, if 383
- ARAVA and methotrexate are given concomitantly, ACR guidelines for monitoring 384 385 methotrexate liver toxicity must be followed with ALT, AST, and serum albumin testing monthly. 386
- Guidelines for dose adjustment or discontinuation based on the severity and persistence of ALT 387
- 388 elevation are recommended as follows: For confirmed ALT elevations between 2- and 3-fold 389 ULN, dose reduction to 10 mg/day may allow continued administration of ARAVA under close
- 390
- monitoring. If elevations between 2- and 3-fold ULN persist despite dose reduction or if ALT
- 391 elevations of >3-fold ULN are present, ARAVA should be discontinued and cholestyramine or
- 392 charcoal should be administered (see PRECAUTIONS - General - Need for Drug
- 393 Elimination) with close monitoring, including retreatment with cholestyramine or charcoal as 394 indicated
- 395 In clinical trials, ARAVA treatment as monotherapy or in combination with methotrexate was 396 associated with elevations of liver enzymes, primarily ALT and AST, in a significant number of
- 397 patients; these effects were generally reversible. Most transaminase elevations were mild (≤ 2 -
- 398 fold ULN) and usually resolved while continuing treatment. Marked elevations (>3-fold ULN)
- 399 occurred infrequently and reversed with dose reduction or discontinuation of treatment. Table 8
- 400 shows liver enzyme elevations seen with monthly monitoring in clinical trials US301 and
- 401 MN301. It was notable that the absence of folate use in MN302 was associated with a
- 402 considerably greater incidence of liver enzyme elevation on methotrexate.
- 403 404

Table 8. Liver Enzyme Elevations >3-fold Upper Limits of Normal (ULN)								
	US301			MN301			MN302*	
	LEF	PL	MTX	LEF	PL	SSZ	LEF	MTX
ALT (SGPT)								
>3-fold ULN	8	3	5	2	1	2	13	83
(n %)	(4.4)	(2.5)	(2.7)	(1.5)	(1.1)	(1.5)	(2.6)	(16.7)
Reversed to \leq 2-fold ULN:	8	3	5	2	1	2	12	82
Timing of Elevation								
0-3 Months	6	1	1	2	1	2	7	27
4-6 Months	1	1	3	-	-	-	1	34
7-9 Months	1	1	1	-	-	-	-	16
10-12 Months	-	-	-	-	-	-	5	6

*Only 10% of patients in MN302 received folate. All patients in US301 received folate.

406 407

In a 6 month study of 263 patients with persistent active rheumatoid arthritis despite

- 408 methotrexate therapy, and with normal LFTs, leflunomide was added to a group of 133 patients 409 starting at 10 mg per day and increased to 20 mg as needed. An increase in ALT greater than or
- 409starting at 10 mg per day and increased to 20 mg as needed. An increase in ALT greater than or410equal to three times the ULN was observed in 3.8% of patients compared to 0.8% in 130 patients
- 411 continued on methotrexate with placebo added.

412 **Pre-existing Hepatic Disease**

- 413 Given the possible risk of increased hepatotoxicity, and the role of the liver in drug activation,
- elimination and recycling, the use of ARAVA is not recommended in patients with significant
- 415 hepatic impairment or evidence of infection with hepatitis B or C viruses. (See WARNINGS 416 Hopstotovicity)

416 **Hepatotoxicity**).

417 Skin Reactions

- 418 Rare cases of Stevens-Johnson syndrome and toxic epidermal necrolysis have been reported in
- 419 patients receiving ARAVA. If a patient taking ARAVA develops any of these conditions,
- 420 ARAVA therapy should be stopped, and a drug elimination procedure is recommended (see

421 **PRECAUTIONS - General - Need for Drug Elimination**).

422 Malignancy

- The risk of malignancy, particularly lymphoproliferative disorders, is increased with the use of some immunosuppression medications. There is a potential for immunosuppression with
- 425 ARAVA. No apparent increase in the incidence of malignancies and lymphoproliferative
- 425 ARAVA. No apparent increase in the incidence of malignancies and lymphoprometative 426 disorders was reported in the alinical trials of APAVA, but larger and longer term studies was
- 426 disorders was reported in the clinical trials of ARAVA, but larger and longer-term studies would 427 be needed to determine whether there is an increased risk of malignancy or lymphoproliferative
- 427 be needed to determine whether there is an increased risk of malignancy or lymphoproliferative 428 disorders with ARAVA.

429 Use in Women of Childbearing Potential

- 430 There are no adequate and well-controlled studies evaluating ARAVA in pregnant women.
- 431 However, based on animal studies, leflunomide may increase the risk of fetal death or
- 432 teratogenic effects when administered to a pregnant woman (see **CONTRAINDICATIONS**).
- 433 Women of childbearing potential must not be started on ARAVA until pregnancy is excluded
- and it has been confirmed that they are using reliable contraception. Before starting treatment
- 435 with ARAVA, patients must be fully counseled on the potential for serious risk to the fetus.
- The patient must be advised that if there is any delay in onset of menses or any other reason to suspect
- 437 pregnancy, they must notify the physician immediately for pregnancy testing and, if positive, the
- 438 physician and patient must discuss the risk to the pregnancy. It is possible that rapidly lowering the
- 439 blood level of the active metabolite by instituting the drug elimination procedure described below at
- the first delay of menses may decrease the risk to the fetus from ARAVA.
- 441 Upon discontinuing ARAVA, it is recommended that all women of childbearing potential
- 442 undergo the drug elimination procedure described below. Women receiving ARAVA treatment

- who wish to become pregnant must discontinue ARAVA and undergo the drug elimination
 procedure described below which includes verification of M1 metabolite plasma levels less than
- 445 $0.02 \text{ mg/L} (0.02 \mu\text{g/mL})$. Human plasma levels of the active metabolite (M1) less than
- 446 0.02 mg/L (0.02 µg/mL) are expected to have minimal risk based on available animal data.

447 **Drug Elimination Procedure**

- The following drug elimination procedure is recommended to achieve non-detectable plasma
 levels (less than 0.02 mg/L or 0.02 μg/mL) after stopping treatment with ARAVA:
 - 1. Administer cholestyramine 8 grams 3 times daily for 11 days. (The 11 days do not need to be consecutive unless there is a need to lower the plasma level rapidly.)
 - 2. Verify plasma levels less than $0.02 \text{ mg/L} (0.02 \mu\text{g/mL})$ by two separate tests at least 14 days apart. If plasma levels are higher than 0.02 mg/L, additional cholestyramine treatment should be considered.

455 Without the drug elimination procedure, it may take up to 2 years to reach plasma M1 metabolite 456 levels less than 0.02 mg/L due to individual variation in drug clearance.

PRECAUTIONS

460 General

450

451 452

453

454

457 458

459

461 **Need for Drug Elimination**

- The active metabolite of leflunomide is eliminated slowly from the plasma. In instances of any
 serious toxicity from ARAVA, including hypersensitivity, use of a drug elimination procedure as
 described in this section is highly recommended to reduce the drug concentration more rapidly
- after stopping ARAVA therapy. If hypersensitivity is the suspected clinical mechanism, more
- 466 prolonged cholestyramine or charcoal administration may be necessary to achieve rapid and
- sufficient clearance. The duration may be modified based on the clinical status of the patient.
- 468 Cholestyramine given orally at a dose of 8 g three times a day for 24 hours to three healthy
- volunteers decreased plasma levels of M1 by approximately 40% in 24 hours and by 49 to 65%
 in 48 hours.
- 471 Administration of activated charcoal (powder made into a suspension) orally or via nasogastric
- 472 tube (50 g every 6 hours for 24 hours) has been shown to reduce plasma concentrations of the
- 473 active metabolite, M1, by 37% in 24 hours and by 48% in 48 hours.
- 474 These drug elimination procedures may be repeated if clinically necessary.

475 **Respiratory**

- 476 Interstitial lung disease has been reported during treatment with leflunomide and has been
- 477 associated with fatal outcomes (see ADVERSE REACTIONS). Interstitial lung disease is a
- 478 potentially fatal disorder, which may occur acutely at any time during therapy and has a variable
- 479 clinical presentation. New onset or worsening pulmonary symptoms, such as cough and
- 480 dyspnea, with or without associated fever, may be a reason for discontinuation of the therapy and
- 481 for further investigation, as appropriate. If discontinuation of the drug is necessary, initiation of
- 482 wash-out procedures should be considered. (see WARNINGS Drug Elimination Procedure).
 483 Renal Insufficiency
- 484 Single dose studies in dialysis patients show a doubling of the free fraction of M1 in plasma.
- 485 There is no clinical experience in the use of ARAVA in patients with renal impairment. Caution
- 486 should be used when administering this drug in this population.

487 Vaccinations

- 488 No clinical data are available on the efficacy and safety of vaccinations during ARAVA
- 489 treatment. Vaccination with live vaccines is, however, not recommended. The long half-life of

- 490 ARAVA should be considered when contemplating administration of a live vaccine after
- 491 stopping ARAVA.

492 Information for Patients

- The potential for increased risk of birth defects should be discussed with female patients of childbearing potential. It is recommended that physicians advise women that they may be at increased risk of having a child with birth defects if they are pregnant when taking ARAVA, become pregnant while taking ARAVA, or do not wait to become pregnant until they have stopped taking ARAVA and followed the drug elimination procedure (as described in WARNINGS Use In Women of Childbearing Potential Drug Elimination Procedure).
- Patients should be advised of the possibility of rare, serious skin reactions. Patients should be instructed to inform their physicians promptly if they develop a skin rash or mucous membrane lesions.
- Patients should be advised of the potential hepatotoxic effects of ARAVA and of the need for monitoring liver enzymes. Patients should be instructed to notify their physicians if they develop symptoms such as unusual tiredness, abdominal pain or jaundice.
- Patients should be advised that they may develop a lowering of their blood counts and should have frequent hematologic monitoring. This is particularly important for patients who are receiving other immunosuppressive therapy concurrently with ARAVA, who
 have recently discontinued such therapy before starting treatment with ARAVA, or who
 have had a history of a significant hematologic abnormality. Patients should be instructed to notify their physicians promptly if they notice symptoms of pancytopenia (such as easy bruising or bleeding, recurrent infections, fever, paleness or unusual tiredness).
- Patients should be informed about the early warning signs of interstitial lung disease and
 asked to contact their physician as soon as possible if these symptoms appear or worsen
 during therapy.

516 Laboratory Tests

517 Hematologic Monitoring

- At minimum, patients taking ARAVA should have platelet, white blood cell count and
 hemoglobin or hematocrit monitored at baseline and monthly for six months following initiation
 of therapy and every 6 to 8 weeks thereafter.
- 521 Bone Marrow Suppression Monitoring
- 522 If used concomitantly with immunosuppressants such as methotrexate, chronic monitoring
- 523 should be monthly. (see WARNINGS Immunosuppression Potential/Bone Marrow
- 524 **Suppression**).

525 *Liver Enzyme Monitoring*

- 526 ALT (SGPT) must be performed at baseline and monitored at monthly intervals during the first 527 six months then, if stable, every 6 to 8 weeks thereafter. In addition, if ARAVA and
- 52/ Six months then, if stable, every 6 to 8 weeks thereafter. In addition, if ARAVA and 528 moth streagets are given concernitently. ACD suidelines for monitoring moth streagets live
- 528 methotrexate are given concomitantly, ACR guidelines for monitoring methotrexate liver 520 toxicity must be followed with ALT, AST, and some albumin testing every month (See
- 529 toxicity must be followed with ALT, AST, and serum albumin testing every month. (See

530 WARNINGS – Hepatotoxicity.)

- 531 Due to a specific effect on the brush border of the renal proximal tubule, ARAVA has a 532 uricosuric effect. A separate effect of hypophosphaturia is seen in some patients. These effects 533 have not been seen together nor have there been alterations in renal function
- have not been seen together, nor have there been alterations in renal function.
- 534Drug Interactions
- 535 Cholestyramine and Charcoal

- Administration of cholestyramine or activated charcoal in patients (n=13) and volunteers (n=96)
- resulted in a rapid and significant decrease in plasma M1 (the active metabolite of leflunomide)
- 538 concentration (see **PRECAUTIONS General Need for Drug Elimination**).

539 Hepatotoxic Drugs

- 540 Increased side effects may occur when leflunomide is given concomitantly with hepatotoxic
- substances. This is also to be considered when leflunomide treatment is followed by such drugs
- 542 without a drug elimination procedure. In a small (n=30) combination study of ARAVA with
- 543 methotrexate, a 2- to 3-fold elevation in liver enzymes was seen in 5 of 30 patients. All
- elevations resolved, 2 with continuation of both drugs and 3 after discontinuation of leflunomide.
- 545 A > 3-fold increase was seen in another 5 patients. All of these also resolved, 2 with continuation
- of both drugs and 3 after discontinuation of leflunomide. Three patients met "ACR criteria" for
- 547 liver biopsy (1: Roegnik Grade I, 2: Roegnik Grade IIIa). No pharmacokinetic interaction was
 548 identified (see CLINICAL PHARMACOLOGY).

549 NSAIDs

- 550 In *in vitro* studies, M1 was shown to cause increases ranging from 13 50% in the free fraction 551 of diclofenac and ibuprofen at concentrations in the clinical range. The clinical significance of 552
- 552 this finding is unknown; however, there was extensive concomitant use of NSAIDs in clinical
- 553 studies and no differential effect was observed.

554 *Tolbutamide*

555 In *in vitro* studies, M1 was shown to cause increases ranging from 13 - 50% in the free fraction 556 of tolbutamide at concentrations in the clinical range. The clinical significance of this finding is 557 unknown.

558 **Rifampin**

- 559 Following concomitant administration of a single dose of ARAVA to subjects receiving multiple
- doses of rifampin, M1 peak levels were increased (~40%) over those seen when ARAVA was
- 561 given alone. Because of the potential for ARAVA levels to continue to increase with multiple
- dosing, caution should be used if patients are to be receiving both ARAVA and rifampin.

563 Warfarin

- 564 Increased INR (International Normalized Ratio) when ARAVA and warfarin were co-
- administered has been rarely reported.

566 Carcinogenesis, Mutagenesis, and Impairment of Fertility

- 567 No evidence of carcinogenicity was observed in a 2-year bioassay in rats at oral doses of 568 leflunomide up to the maximally tolerated dose of 6 mg/kg (approximately 1/40 the maximum
- 569 human M1 systemic exposure based on AUC). However, male mice in a 2-year bioassay
- 570 exhibited an increased incidence in lymphoma at an oral dose of 15 mg/kg, the highest dose
- 571 studied (1.7 times the human M1 exposure based on AUC). Female mice, in the same study,
- 572 exhibited a dose-related increased incidence of bronchoalveolar adenomas and carcinomas
- 573 combined beginning at 1.5 mg/kg (approximately 1/10 the human M1 exposure based on AUC).
- 574 The significance of the findings in mice relative to the clinical use of ARAVA is not known.
- 575 Leflunomide was not mutagenic in the Ames Assay, the Unscheduled DNA Synthesis Assay, or 576 in the HGPRT Gene Mutation Assay. In addition, leflunomide was not clastogenic in the *in vivo*
- 570 In the FIGERT Gene Mutation Assay. In addition, leftunomide was not clastogenic in the *in vivo* 577 Mouse Micronucleus Assay nor in the *in vivo* Cytogenetic Test in Chinese Hamster Bone
- 578 Marrow Cells. However, 4-trifluoromethylaniline (TFMA), a minor metabolite of leflunomide,
- 579 was mutagenic in the Ames Assay and in the HGPRT Gene Mutation Assay, and was clastogenic
- 580 in the *in vitro* Assay for Chromosome Aberrations in the Chinese Hamster Cells. TFMA was not
- 581 clastogenic in the *in vivo* Mouse Micronucleus Assay nor in the *in vivo* Cytogenetic Test in
- 582 Chinese Hamster Bone Marrow Cells. Leflunomide had no effect on fertility in either male or

- 583 female rats at oral doses up to 4.0 mg/kg (approximately 1/30 the human M1 exposure based on 584 AUC).
- 585
- Pregnancy
- 586 **Pregnancy Category X.** (See CONTRAINDICATIONS section.) Pregnancy Registry: To
- 587 monitor fetal outcomes of pregnant women exposed to leflunomide, health care providers are
- 588 encouraged to register such patients by calling 1-877-311-8972.

589 **Nursing Mothers**

- 590 ARAVA should not be used by nursing mothers. It is not known whether ARAVA is excreted in
- 591 human milk. Many drugs are excreted in human milk, and there is a potential for serious adverse
- 592 reactions in nursing infants from ARAVA. Therefore, a decision should be made whether to
- 593 proceed with nursing or to initiate treatment with ARAVA, taking into account the importance of
- 594 the drug to the mother.

595 Use in Males

- 596 Available information does not suggest that ARAVA would be associated with an increased risk
- 597 of male-mediated fetal toxicity. However, animal studies to evaluate this specific risk have not 598
- been conducted. To minimize any possible risk, men wishing to father a child should consider 599 discontinuing use of ARAVA and taking cholestyramine 8 grams 3 times daily for 11 days.

600 **Pediatric Use**

- 601 The safety and effectiveness of ARAVA in pediatric patients with polyarticular course juvenile
- rheumatoid arthritis (JRA) have not been fully evaluated. (See CLINICAL STUDIES and 602 **ADVERSE REACTIONS).** 603

604 Geriatric Use

- 605 Of the total number of subjects in controlled clinical (Phase III) studies of ARAVA, 234 subjects
- 606 were 65 years and over. No overall differences in safety or effectiveness were observed between
- 607 these subjects and younger subjects, and other reported clinical experience has not identified
- 608 differences in responses between the elderly and younger patients, but greater sensitivity of some
- 609 older individuals cannot be ruled out. No dosage adjustment is needed in patients over 65.
- 610

611 612

ADVERSE REACTIONS

- 613 Adverse reactions associated with the use of leflunomide in RA include diarrhea, elevated liver 614 enzymes (ALT and AST), alopecia and rash. In the controlled studies at one year, the following
- 615 adverse events were reported, regardless of causality. (See Table 9.)

Table 9. Percentage Of Parallel	All RA			trolled Tria		Active-C	
	Studies			ti oncu 111a	15	Tri	
	Studies	MN 301 and US 301			MN 302*		
	LEF	LEF	PBO	SSZ	MTX	LEF	MTX
	$(N=1339)^{1}$	(N=315)	(N=210)	(N=133)	(N=182)	(N=501)	(N=4
				· · · ·	Ì Ì	· · · ·	98)
BODY AS A WHOLE							Í
Allergic Reaction	2%	5%	2%	0%	6%	1%	2%
Asthenia	3%	6%	4%	5%	6%	3%	3%
Flu Syndrome	2%	4%	2%	0%	7%	0%	0%
Infection, upper respiratory	4%	0%	0%	0%	0%	0%	0%
Injury Accident	5%	7%	5%	3%	11%	6%	7%
Pain	2%	4%	2%	2%	5%	1%	<1%
Abdominal Pain	6%	5%	4%	4%	8%	6%	4%
Back Pain	5%	6%	3%	4%	9%	8%	7%
CARDIOVASCULAR							
Hypertension ²	10%	9%	4%	4%	3%	10%	4%
- New onset of hypertension		1%	<1%	0%	2%	2%	<1%
Chest Pain	2%	4%	2%	2%	4%	1%	2%
GASTROINTESTINAL							
Anorexia	3%	3%	2%	5%	2%	3%	3%
Diarrhea	17%	27%	12%	10%	20%	22%	10%
Dyspepsia	5%	10%	10%	9%	13%	6%	7%
Gastroenteritis	3%	1%	1%	0%	6%	3%	3%
Abnormal Liver Enzymes	5%	10%	2%	4%	10%	6%	17%
Nausea	9%	13%	11%	19%	18%	13%	18%
GI/Abdominal Pain	5%	6%	4%	7%	8%	8%	8%
Mouth Ulcer	3%	5%	4%	3%	10%	3%	6%
Vomiting	3%	5%	4%	4%	3%	3%	3%
METABOLIC AND							
NUTRITIONAL							
Hypokalemia	1%	3%	1%	1%	1%	1%	<1%
Weight Loss ³	4%	2%	1%	2%	0%	2%	2%
MUSCULO-SKELETAL							
SYSTEM							
Arthralgia	1%	4%	3%	0%	9%	<1%	1%
Leg Cramps	1%	4%	2%	2%	6%	0%	0%
Joint Disorder	4%	2%	2%	2%	2%	8%	6%
Synovitis	2%	<1%	1%	0%	2%	4%	2%
Tenosynovitis	3%	2%	0%	1%	2%	5%	1%
NERVOUS SYSTEM	40.4	50/	201	(0)	5 0 ((0)
Dizziness	4%	5%	3%	6%	5%	7%	6%
Headache	7%	13%	11%	12%	21%	10%	8%
Paresthesia	2%	3%	1%	1%	2%	4%	3%
RESPIRATORY							
SYSTEM Propehitic	7%	50/	2%	4%	7%	8%	7%
Bronchitis	3%	5%	5%	3%	6%	<u> </u>	7% 7%
Increased Cough		4%					25%
Respiratory Infection	15%	21%	21%	20%	32%	27%	
Pharyngitis	3%	2%	1%	2%	1%	3%	3%
Pneumonia Phinitia	2%	3%	0%	0%	1%	2%	2%
Rhinitis Sinusitis	2% 2%	5% 5%	2% 5%	4% 0%	3% 10%	2% 1%	2% 1%

SKIN AND APPENDAGES							
Alopecia	10%	9%	1%	6%	6%	17%	10%
Eczema	2%	1%	1%	1%	1%	3%	2%
Pruritus	4%	5%	2%	3%	2%	6%	2%
Rash	10%	12%	7%	11%	9%	11%	10%
Dry Skin	2%	3%	2%	2%	0%	3%	1%
UROGENITAL							
SYSTEM							
Urinary Tract Infection	5%	5%	7%	4%	2%	5%	6%

- 618 * Only 10% of patients in MN302 received folate. All patients in US301 received folate; none in
 619 MN301 received folate.
 - 1 Includes all controlled and uncontrolled trials with leflunomide (duration up to 12 months).
- 621 2 Hypertension as a preexisting condition was overrepresented in all leflunomide treatment
 622 groups in phase III trials
- In a meta-analysis of all phase II and III studies, during the first 6 months in patients receiving
 leflunomide, 10% lost 10-19 lbs (24 cases per 100 patient years) and 2% lost at least 20 lbs (4
 cases/100 patient years). Of patients receiving leflunomide, 4% lost 10% of their baseline weight
 during the first 6 months of treatment.
- 627
- Adverse events during a second year of treatment with leflunomide in clinical trials were consistent with those observed during the first year of treatment and occurred at a similar or
- 630 lower incidence.631
- In addition, the following adverse events have been reported in 1% to <3% of the RA patients in
 the leflunomide treatment group in controlled clinical trials.
- Body as a Whole: abscess, cyst, fever, hernia, malaise, pain, neck pain, pelvic pain;
- 635 Cardiovascular: angina pectoris, migraine, palpitation, tachycardia, varicose vein, vasculitis,
 636 vasodilatation;
- 637 Gastrointestinal: cholelithiasis, colitis, constipation, esophagitis, flatulence, gastritis, gingivitis,
- melena, oral moniliasis, pharyngitis, salivary gland enlarged, stomatitis (or aphthous stomatitis),
 tooth disorder;
- 640 **Endocrine:** diabetes mellitus, hyperthyroidism;
- 641 Hemic and Lymphatic System: anemia (including iron deficiency anemia), ecchymosis;
- Metabolic and Nutritional: creatine phosphokinase increased, hyperglycemia, hyperlipidemia,
 peripheral edema;
- Musculo-Skeletal System: arthrosis, bone necrosis, bone pain, bursitis, muscle cramps, myalgia,
 tendon rupture;
- 646 **Nervous System:** anxiety, depression, dry mouth, insomnia, neuralgia, neuritis, sleep disorder,
- 647 sweating increased, vertigo;
- 648 **Respiratory System:** asthma, dyspnea, epistaxis, lung disorder;
- 649 Skin and Appendages: acne, contact dermatitis, fungal dermatitis, hair discoloration,
- 650 hematoma, herpes simplex, herpes zoster, maculopapular rash, nail disorder, skin discoloration,
- 651 skin disorder, skin nodule, subcutaneous nodule, ulcer skin;
- 652 **Special Senses:** blurred vision, cataract, conjunctivitis, eye disorder, taste perversion;
- 653 **Urogenital System:** albuminuria, cystitis, dysuria, hematuria, menstrual disorder, prostate
- disorder, urinary frequency, vaginal moniliasis.
- 655

657

658 eosinophilia; transient thrombocytopenia (rare); and leukopenia <2000 WBC/mm³ (rare). 659 Adverse events during a second year of treatment with leflunomide in clinical trials were 660 consistent with those observed during the first year of treatment and occurred at a similar or 661 662 lower incidence. 663 664 In post-marketing experience, the following have been reported rarely: 665 **Body as a whole:** opportunistic infections, severe infections including sepsis that may be fatal; 666 Gastrointestinal: pancreatitis; Hematologic: agranulocytosis, leukopenia, neutropenia, pancytopenia, thrombocytopenia; 667 Hypersensitivity: angioedema: 668 Hepatic: hepatitis, jaundice/cholestasis, severe liver injury such as hepatic failure and acute 669 hepatic necrosis that may be fatal: 670 671 **Respiratory:** interstitial lung disease, including interstitial pneumonitis and pulmonary fibrosis, 672 which may be fatal; Nervous system: peripheral neuropathy; 673 674 Skin and Appendages: erythema multiforme, Stevens-Johnson syndrome, toxic epidermal 675 necrolysis. 676 677 **Adverse Reactions (Pediatric Patients)** The safety of ARAVA was studied in 74 patients with polyarticular course juvenile rheumatoid 678 arthritis ranging in age from 3-17 years (47 patients from the active-controlled study and 27 from 679 680 an open-label safety and pharmacokinetic study). The most common adverse events included 681 abdominal pain, diarrhea, nausea, vomiting, oral ulcers, upper respiratory tract infections, alopecia, rash, headache, and dizziness. Less common adverse events included anemia, 682 hypertension, and weight loss. Fourteen pediatric patients experienced ALT and/or AST 683 684 elevations, nine between 1.2 and 3-fold the upper limit of normal, five between 3 and 8-fold the upper limit of normal. 685 686 687 **DRUG ABUSE AND DEPENDENCE** 688 689 ARAVA has no known potential for abuse or dependence. 690 691 **OVERDOSAGE** 692 693 In mouse and rat acute toxicology studies, the minimally toxic dose for oral leflunomide was 694 200-- 500 mg/kg and 100 mg/kg, respectively (approximately >350 times the maximum 695 recommended human dose, respectively). 696 There have been reports of chronic overdose in patients taking ARAVA at daily dose up to five 697 times the recommended daily dose and reports of acute overdose in adults or children. There 698 were no adverse events reported in the majority of case reports of overdose. Adverse events were 699 consistent with the safety profile for ARAVA (see ADVERSE REACTIONS). The most

Other less common adverse events seen in clinical trials include: 1 case of anaphylactic reaction occurred in Phase 2 following rechallenge of drug after withdrawal due to rash (rare); urticaria;

- frequent adverse events observed were diarrhea, abdominal pain, leukopenia, anemia and
- 701 elevated liver function tests.

702	In the event of a significant overdose or toxicity, cholestyramine or charcoal administration is
703	recommended to accelerate elimination (see PRECAUTIONS – General – Need for Drug
704	Elimination).
705	Studies with both hemodialysis and CAPD (chronic ambulatory peritoneal dialysis) indicate that
706	M1, the primary metabolite of leflunomide, is not dialyzable. (see CLINICAL
707	PHARMACOLOGY – Elimination).
708	
709	DOSAGE AND ADMINISTRATION
710	
711	Loading Dose
712	Due to the long half-life in patients with RA and recommended dosing interval (24 hours), a
713	loading dose is needed to provide steady-state concentrations more rapidly. It is recommended
714	that ARAVA therapy be initiated with a loading dose of one 100 mg tablet per day for 3 days.
715	Elimination of the loading dose regimen may decrease the risk of adverse events. This could be
716	especially important for patients at increased risk of hematologic or hepatic toxicity, such as
717	those receiving concomitant treatment with methotrexate or other immunosuppressive agents or
718	on such medications in the recent past. (See WARNINGS — Hepatotoxicity).
719	Maintenance Therapy
720	Daily dosing of 20 mg is recommended for treatment of patients with RA. A small cohort of
721	patients (n=104), treated with 25 mg/day, experienced a greater incidence of side effects;
722	alopecia, weight loss, liver enzyme elevations. Doses higher than 20 mg/day are not
723	recommended. If dosing at 20 mg/day is not well tolerated clinically, the dose may be
724	decreased to 10 mg daily. Liver enzymes must be monitored and dose adjustments may be
725	necessary (see WARNINGS – Hepatotoxicity). Due to the prolonged half-life of the active
726	metabolite of leflunomide, patients should be carefully observed after dose reduction, since it
727	may take several weeks for metabolite levels to decline.
728	
729	HOW SUPPLIED
730	
731	ARAVA Tablets in 10 and 20 mg strengths are packaged in bottles. ARAVA Tablets 100 mg
732	strength are packaged in blister packs.

ARAVA[®] (leflunomide) Tablets

Strength	Quantity	NDC	Description
Strengen	Quantity	Number	Description
10 mg	30 count bottle	0088-2160-30	White, round film-coated tablet embossed with
			"ZBN" on one side.
20 mg	30 count bottle	0088-2161-30	Light yellow, triangular film-coated tablet
			embossed with "ZBO" on one side.
100 mg	3 count blister	0088-2162-03	White, round film-coated tablet embossed with
_	pack		"ZBP" on one side.

735

Store at 25°C (77°F); excursions permitted to 15-30°C (59-86°F) [see USP Controlled Room
 Temperature]. Protect from light.

738 739 Rx only.

740

741 Rev. November 2004

NDA 20-905/S-014 Page 28

- 743 Manufactured by
- 744 Aventis Pharma Specialites, 60200 Compiegne, France
- 745 for
- 746 Aventis Pharmaceuticals Inc.
- 747 Kansas City, MO 64137
- 748749 Made in France
- 750
- 751 ©Aventis Pharmaceuticals Inc.