

Important First Generic Approvals – 2007

- FENTANYL TRANSDERMAL SYSTEM, 12 MCG/HOUR (Duragesic-12)
- PROPRANOLOL HCL EXTENDED-RELEASE CAPSULES (Inderal LA)
- DEXMETHYLPHENIDATE HCL TABLETS (Focalin)
- VALACYCLOVIR HCL TABLETS (Valtrex)
- SERTRALINE HCL TABLETS (Zoloft)
- RABEPRAZOLE SODIUM DELAYED-RELEASE TABLETS (Aciphex)
- RANITIDINE ORAL SOLUTION USP (Zantac Syrup)
- CITALOPRAM HBR CAPSULES (Celexa)
- MOEXIPRIL HCL AND HYDROCHLOROTHIAZIDE TABLETS (Uniretic)
- DIDANOSINE FOR ORAL SOLUTION (PEDIATRIC POWDER), (Videx)
- PREDNICARBATE OINTMENT (Dermatop)
- CIPROFLOXACIN EXTENDED-RELEASE TABLETS (Ciprox XR)
- NADOLOL AND BENDROFLUMETHIAZIDE TABLETS USP, (Corzide)
- CEFIXIME FOR ORAL SUSPENSION USP (Cefixime)
- NIMODIPINE CAPSULES (Nimotop)
- ZOLPIDEM TARTRATE TABLETS (Ambien)
- PRAVASTATIN SODIUM TABLETS (Pravachol)
- METOPROLOL SUCCINATE EXTENDED-RELEASE TABLETS USP (Toprol XL)
- PAROXETINE HCL EXTENDED-RELEASE TABLETS (Paxil CR)

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NDA vs. ANDA Review Process

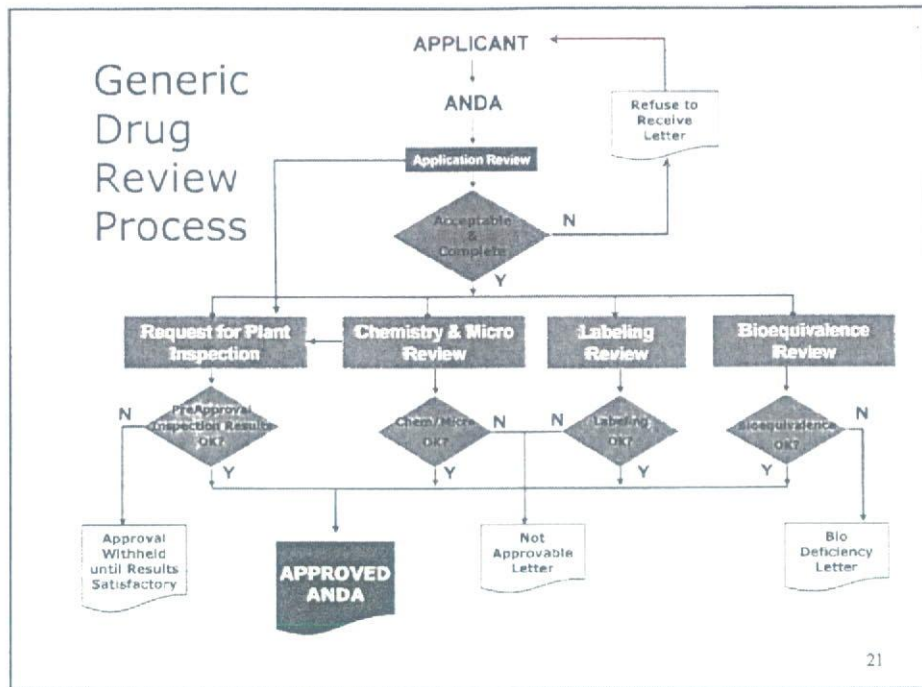
Brand Name Drug NDA Requirements	Generic Drug ANDA Requirements
1. Chemistry	1. Chemistry
2. Manufacturing	2. Manufacturing
3. Controls	3. Controls
4. Labeling	4. Labeling
5. Testing	5. Testing
6. Animal Studies	6. Bioequivalence
7. Clinical Studies	
8. Bioavailability	

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NDA vs. ANDA Review Process

- NDA Review = Lower volume (ave. 25 approvals/year), but Higher Complexity (Pre-Clinical, Clinical Trials, etc.)
- ANDA Review = Higher volume (425 approvals/year), but Lower Complexity (Safety & Efficacy already established)

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Manufacturing Compliance Programs



- Purpose - To assure quality of marketed drug products
- Mechanisms - Product Testing
 - ◆ Surveillance
 - ◆ Manufacturing/Testing Site Inspections (EERs)
 - ◆ Assess firm's compliance with good manufacturing/laboratory processes

Chemistry Review



- Components and composition
- Manufacturing and controls
- Batch formulation and records
- Description of facilities
- Specs and tests
- Packaging
- Stability

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Labeling Review



- “Same” as brand name labeling
- May delete portions of labeling protected by patent or exclusivity
- May differ in excipients, PK data and how supplied

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Definition of Bioequivalence (BE)



Pharmaceutical equivalents whose rate and extent of absorption are not statistically different when administered to patients or subjects at the same molar dose under similar experimental conditions

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Purpose of BE Review



- Therapeutic equivalence (TE)
- Bioequivalent products can be substituted for each other without any adjustment in dose or other additional therapeutic monitoring
- The most efficient method of assuring TE is to assure that the formulations perform in an equivalent manner

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Clinical Review Staff



- Dr. Dena Hixon, M.D.
- Reviews bioequivalence studies with clinical endpoints
- Evaluates safety issues (inactive ingredients, adverse events, etc.)
- Assesses clinical issues in ANDAs (effect of different vehicles, inactive ingredients)
- Assesses equivalence challenges

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OGD Project Manager Role

- Discipline specific PMs
- Review process based on **First-In = First-Reviewed** – Not PDUFA
- Chemistry review drives the review process; hence, Chemistry PM monitors overall review progress
 - ◆ Ex: Informs Bioequivalence/Microbiology PM of need for reviews
 - ◆ Prepares full approval package

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OGD Project Manager Role

- Bioequivalence PM
 - ◆ Controlled correspondence
 - ◆ Bioequivalence waiver requests
 - ◆ Bioequivalence review queues
- Microbiology PM
 - ◆ Monitors review queue
 - ◆ Assures ANDAs needing microbiology review are identified

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OGD Project Manager Role

- All fulfill other traditional PM functions, e.g., communication with industry, assuring all actions are documented

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Research Initiatives by OGD Scientific Staff
Lawrence Yu, Ph.D., Director for Science

- Respond to Scientific Challenges
- Develop Bioequivalence Methods
 - ◆ MDIs
 - ◆ Topicals
 - ◆ Injectable Suspensions
- Expand In-House Capabilities
- Work with Office Testing & Research in developing/hiring expertise
- External Contracts

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“Orange Book Staff”



- “Approved Drug Products with Therapeutic Equivalence Evaluations”
- All FDA approved drug products listed (NDA’s, OTC’s & ANDA’s)
 - ◆ Therapeutic equivalence codes
 - “A” = Substitutable
 - “B” = Inequivalent, NOT Substitutable
 - ◆ Expiration dates: patent and exclusivity
 - ◆ Reference Listed Drugs/brand drugs identified by FDA for generic companies to compare with their proposed products

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OGD Education Committee

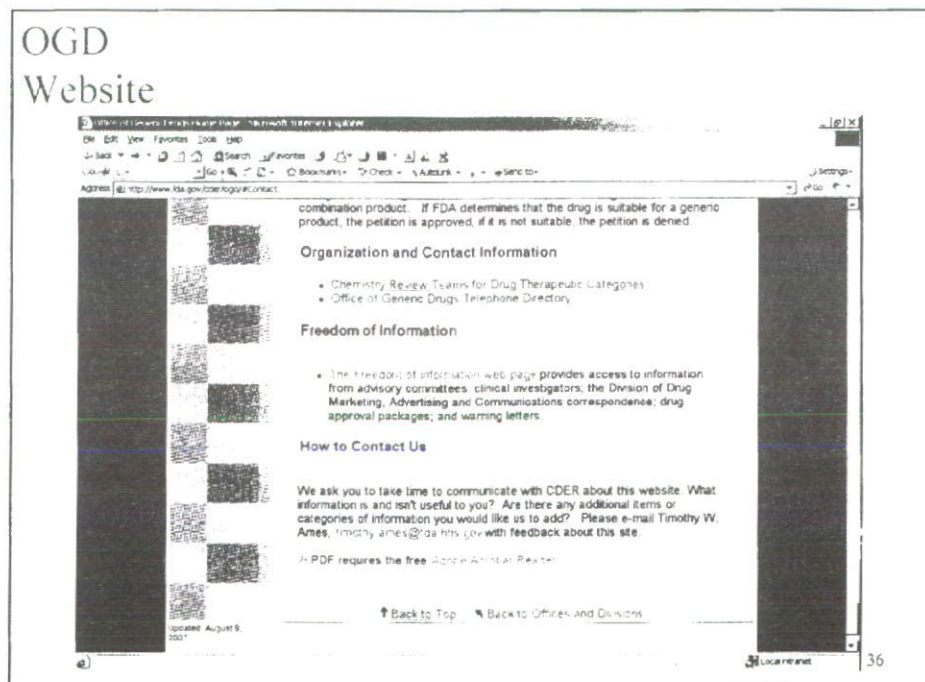
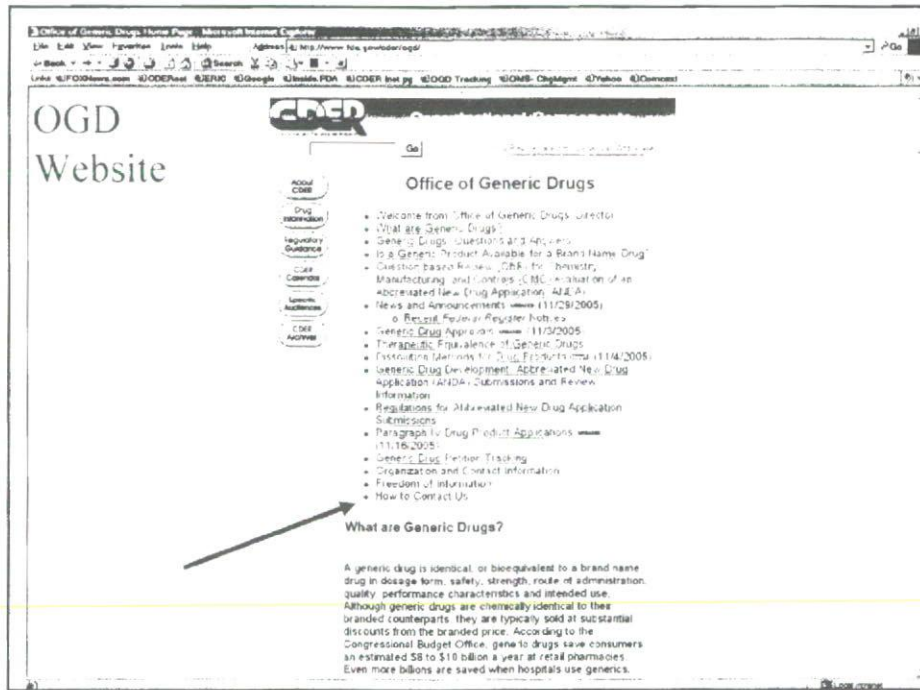
- Purpose – To provide educational offerings for the OGD staff including training and plant visits
- Committee has at least one member from each OGD review discipline
- Plant trips
- OGD Reviewer Forum
- Workshops – Open to others on space available basis

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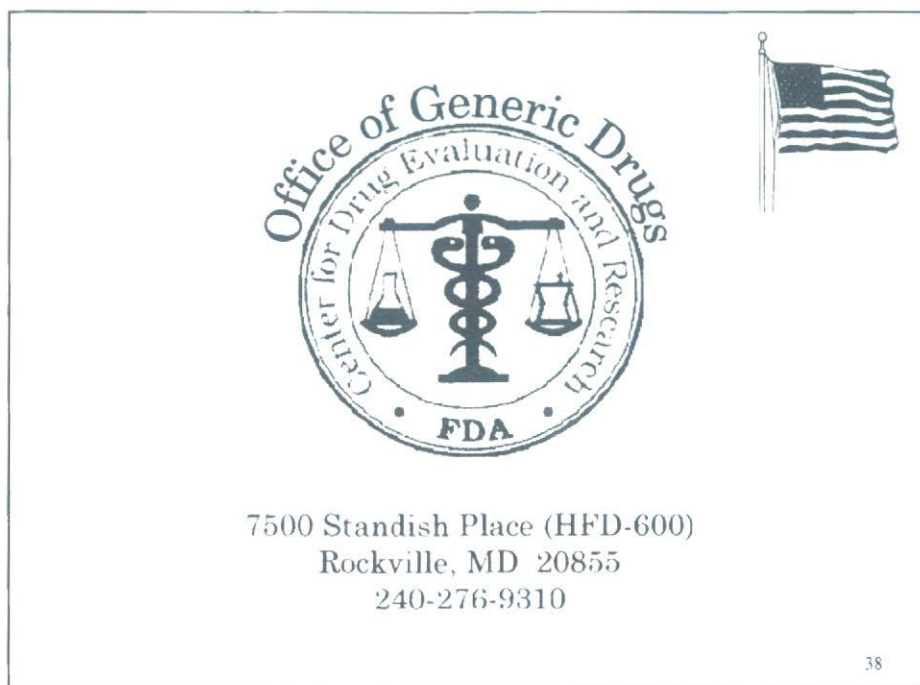
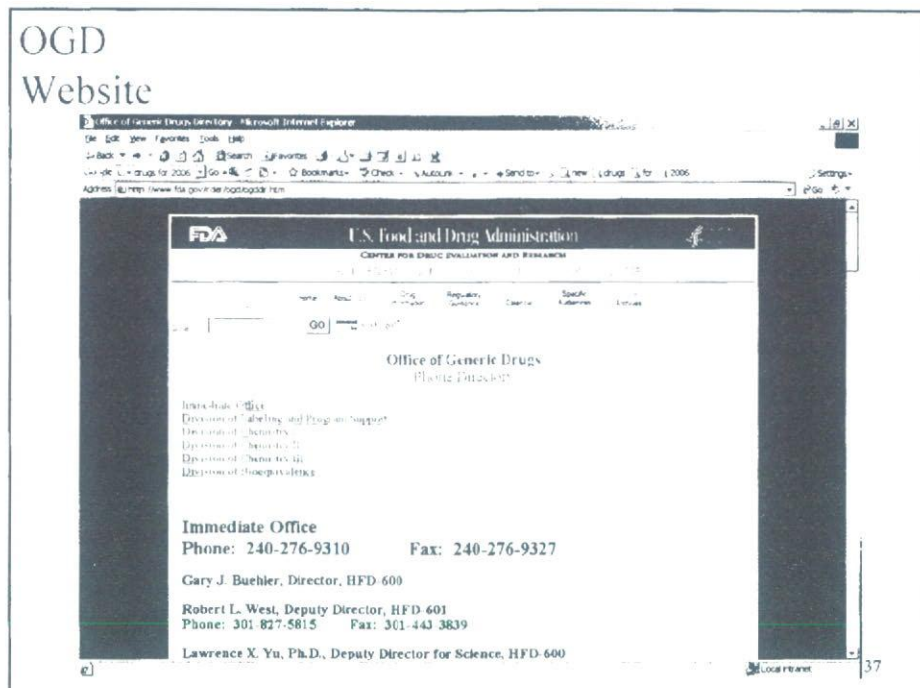
New Drug Review Divisions Interactions with OGD

- Bundled Reviews
- Consults
- Risk Management/Educational Programs
- Labeling Supplements
- Best Pharmaceuticals for Children Act (BPCA)
- OGD Website – Contact list

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OGD Website



***Impact of USP Monographs
on the
Office of Generic Drugs
Review Process***

October 1, 2007

Frank O. Holcombe, Jr., Ph.D.
Associate Director for Chemistry
Office of Generic Drugs

USP/NF

United States Pharmacopial Convention

- **Promote Public Health Through Authoritative Standards and Information**
- **United States Pharmacopeia and National Formulary**
- **Independent**
- **Public Process**
- **Non-Governmental**

United States Pharmacopeia & National Formulary

The Official Compendia of Standards

Organization

- **General Notices**
- **Official Monographs**
- **General Chapters**

- **National Formulary**

USP/NF

Monographs

- **Official Articles**
 - **Drug Substance**
 - **Inactive Ingredient (excipients)**
 - **Drug Product**

- **Official drug products/devices**
 - **Ingredients meet Compendial Monographs**

USP/NF

Monograph

Drug Substance Parameter Examples

- * Description
- * Packaging and Storage
- * Reference Standards (as available)
- * Identification
- Residue on Ignition
- Heavy Metals
- Organic Volatile Impurities
- Chromatographic Purity
- Water/Loss on Drying
- * Assay

USP/NF

Monograph

Drug Product Parameter Examples

- * Description
- * Packaging and Storage
- * Reference Standards (as available)
- * Identification
- pH
- Dissolution
- * Uniformity of Dosage Units
- Related Compounds
- Water/Loss on Drying
- * Assay

USP/NF

Food Drug and Cosmetic Act

Section 201 (g)(1) - “drug” means

- **(A) articles recognized in the official United States Pharmacopeia, ... National Formulary....**
- **(D)articles intended for use as a component of any articles specified in (A)....**

Section 501(b) - Adulterated Drugs

- **Strength, Quality, Purity**

Section 502(e), (g) - Misbranded Drugs

- **Established Name; Packaging**

USP/NF

Title 21 - Code of Federal Regulations

Section 314.50(d)(1) - Chemistry, manufacturing, and controls

- **Drug Product, Drug Substance -**
 - **Reference to ... U.S. Pharmacopeia ... may satisfy relevant requirements of this paragraph.**

Section 314.50(e) - Samples and labeling

- **Reference standards recognized ... official compendium ...**

USP/NF	
Monograph	
Concern	- Identity
	- Quality
	- Strength
	- Purity
Provides	- Tests
	- Methods
	- Acceptance Criteria

USP/NF		Application Review Goals	
Monograph			
Concerns	- Identity	Concerns	- Identity
	- Quality		- Quality
	- Strength		- Strength
	- Purity		- Purity
			- Bioequivalence
Provides	- Tests	Evaluate	- Tests
	- Methods		- Methods
	- Acceptance Criteria		- Acceptance Criteria

USP/NF

Application Review Goals

Additional Concerns

- **Manufacturing**
- **Development**
- **Scale Up**
- **Non-USP materials**
- **Non-USP attributes**

USP/NF

Review Process

- **Monograph**
 - *Required Criteria*
 - **Provides Defined Methods**
 - **Provides Basis for Standard Procedures**
 - **Provides Structure for Generalized Acceptance Criteria**
 - *A Partial Basis for Specification Setting*

USP/NF

Review Process Issues

• **Monograph • A *Partial* Basis for Specification Setting**

- **Criteria are Official**
- **Defined for Release and Shelf Life**
 - **Stability Indicating Methods?**
- **Criteria are Generally Process-specific**
- **Single source vs Multi-source**
 - **Impurities/Degradants**
 - **Substitution**
- **Multiple Methods**

USP/NF

Monograph at Time of Application Approval

<u>Year</u>	<u>Drug Substance</u>	<u>Drug Product</u>	<u>Distinct DS</u> (% total app)
1997	60 %	35 %	44 %
1998	59 %	57 %	53 %
1999	80 %	61 %	58 %
2000	75 %	62 %	68 %
2004*	-----	48%	-----

* January - June