

**TOPICAL DERMATOLOGIC CORTICOSTEROIDS IN VIVO  
BIOEQUIVALENCE STUDY SUMMARY TABLES AND SAS TRANSPORT  
FORMATTED TABLES FOR DATASET SUBMISSION**

**I. Pre-Study Method Validation**

**Table 1. Chromameter Validation**

Operator ID/Subject ID/Site #				
Reading	Chromameter 1	Chromameter 2	Chromameter 3	Chromameter n
Date of Testing				
Replicate 1				
Replicate 2				
Replicate 3				
Replicate 4				
Intra-chromameter, mean				
Intra-chromameter, %CV (<15%)				
Inter-chromameter, %CV (<15%)				

(The chromameter qualification should be repeated with at least four study subjects, using at least four skin sites in each study subject)

**Table 2. Operator Validation**

Chromameter ID/Subject ID/Site #				
Reading	Operator 1	Operator 2	Operator 3	Operator n
Date of Testing				
Replicate 1				
Replicate 2				
Replicate 3				
Replicate 4				
Intra-operator, mean				
Intra-operator, % CV (<15%)				
Inter-operator, CV%				

(<15%)	
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(The operator qualification should be repeated with at least four study subjects, using at least four skin sites in each study subject)

## II. Summary of Studies

**Table 3. Summary of the Pilot Dose Duration-Response Study**

Study Ref. No.	Study Objective	Study Design	Treatment(s) (Dose, Dosage Form, Route) [Product ID]	Subject No. (M/F) Type Age: Mean (Range)	Mean Parameters		Study Report Location
					E <sub>max</sub>	ED <sub>50</sub> (minutes)	

**Table 4. Summary of the Pivotal Bioequivalence Study**

Study Ref. No.	Study Objective	Study Design	Treatments (Dose, Dosage Form, Route) [Product ID]	Subjects No. (M/F) Type Age: Mean (Range)	Mean Parameter	Study Report Location
					Negative AUEC (no. of subjects <sup>1</sup> )	
					Test:	
					Reference:	

**Table 5. Summary of the Pivotal Bioequivalence Study**

Treatment Dose: XX per site: Occlusion/Non-Occlusion Pharmacodynamic Parameters, Area Under the Effect Curve, Point Estimates and 90% Confidence Intervals					
Pivotal (Vasoconstrictor Study), Study No.					
Locke's Method	Number of Subjects <sup>2</sup>	AUEC <sub>(0-24hr)</sub>		Point Estimate	90% C.I.
		Test	Reference		
Calculated by Applicant					

**Table 6. Listing of Relevant Standard Operating Procedures for Pre-Study Method Validation and Pilot Dose Duration-Response and Pivotal BE Studies**

SOP No.	Effective Date of SOP	SOP Title

<sup>1</sup> Number of subjects who meet the criterion of (AUEC at D2)/(AUEC at D1) ≥ 1.25

<sup>2</sup> Number of subjects who meet the criterion of (AUEC at D2)/(AUEC at D1) ≥ 1.25

### III. Pilot Dose Duration-Response Study

**Table 7. Study Information**

<b>Study Number</b>	
<b>Study Title</b>	
<b>Clinical Site (Name &amp; Address)</b>	
<b>Principal Investigator</b>	
<b>Dosing Dates</b>	
<b>Were the subjects dosed in more than group?</b>	Yes/No
<b>If yes, specify the screening dates for each group</b>	
<b>If yes, specify the dosing dates for each group</b>	
<b>If yes, specify whether the same clinical sites were used for each group</b>	

**Table 8. Product Information**

<b>Product</b>	<b>Reference</b>
<b>Treatment ID</b>	
<b>Product Name</b>	
<b>Manufacturer</b>	
<b>Batch/Lot No.</b>	
<b>Expiration Date</b>	
<b>Strength</b>	
<b>Dosage Form</b>	
<b>Potency</b>	
<b>Homogeneity</b>	If applicable
<b>Dose Administered</b>	(e.g. 5.0 µL/cm <sup>2</sup> (20µL total/4-cm <sup>2</sup> site))(e.g.)
<b>Route of Administration</b>	

**Table 9. Demographic Profile of Subjects Completing the Pilot Dose Duration-Response Study**

Study No.		
		Treatment Group
		Reference Product N=
Age (years)	Mean ± SD Range	
Age Groups	< 18 18 – 40 41 – 64 65 – 75 > 75	
Sex	Male Female	
Race	American Indian or Alaska Native Asian Black or African American Native Hawaiian or Other Pacific Islander White	
Ethnicity	Hispanic or Latino Not Hispanic or Latino	
BMI	Mean ± SD Range	
Other Factors		

**Table 10. Dropout Information, Pilot Dose Duration-Response Study**

Study No.				
Subject No	Reason for dropout/replacement	Period	Replaced?	Replaced with

**Table 11. Study Adverse Events, Pilot Dose Duration-Response Study**

Body System/Adverse Event	Study No.
	Reference Product N=
Total	N (%)

**Table 12. Protocol Deviations, Pilot Dose Duration-Response Study**

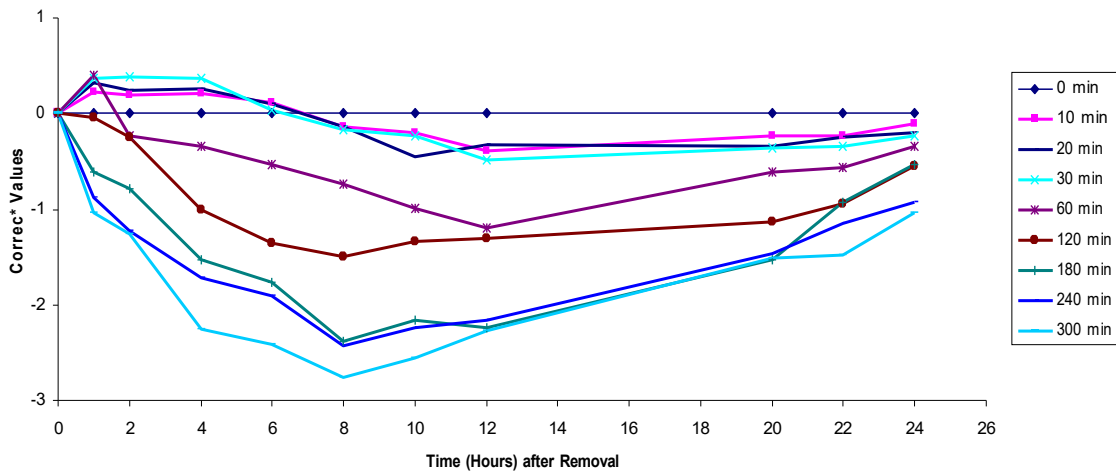
Study No.	
Type	Subject #s

**Table 13. ED<sub>50</sub> and Emax Values Calculated**

Model	Software Used	Assumption of Distribution (ED <sub>50</sub> ) (Normal/Log Normal)			
Initial Population Parameter Estimates		Final Population Parameter (Model Derived) Estimates			
ED <sub>50</sub>	Emax	ED <sub>50</sub>	Emax	Maximum Likelihood	Akaike Criteria Value

**Figure 1. Graphical Representation of Time After Drug Removal versus Mean Corrected Values**

Example:



#### IV. Pivotal Bioequivalence Study

**Table 14. Study Information**

<b>Study Number</b>	
<b>Study Title</b>	
<b>Clinical Site (Name &amp; Address)</b>	
<b>Principal Investigator</b>	
<b>Dosing Dates</b>	
<b>Were the subjects dosed in more than group?</b>	Yes/No
<b>If yes, specify the screening dates for each group</b>	
<b>If yes, specify the dosing dates for each group</b>	
<b>If yes, specify whether the same clinical site was used for each group</b>	

**Table 15. Product Information**

<b>Product</b>	<b>Test</b>	<b>Reference</b>
<b>Treatment ID</b>		
<b>Product Name</b>		
<b>Manufacturer</b>		
<b>Batch/Lot No.</b>		
<b>Manufacture Date</b>		N/A
<b>Expiration Date</b>	N/A	
<b>Strength</b>		
<b>Dosage Form</b>		
<b>Bio-batch Size</b>		N/A
<b>Production Batch Size</b>		N/A
<b>Potency</b>		
<b>Homogeneity</b>	If applicable	If applicable
<b>Dose Administered</b>	(e.g. 5.0 µL/cm <sup>2</sup> (20µL total/4-cm <sup>2</sup> site))(e.g.)	(e.g. 5.0 µL/cm <sup>2</sup> (20µL total/4-cm <sup>2</sup> site))(e.g.)
<b>Route of Administration</b>		

**Table 16. Demographic Profile of Subjects Completing the Pivotal Bioequivalence Study**

Study No.			
		Treatment Groups	
		Test Product N =	Reference Product N =
Age (years)	Mean ± SD Range		
Age Groups	< 18 18 – 40 41 – 64 65 – 75 > 75		
Sex	Male Female		
Race	American Indian or Alaska Native Asian Black or African American Native Hawaiian or Other Pacific Islander White		
Ethnicity	Hispanic or Latino Not Hispanic or Latino		
BMI	Mean ± SD Range		
Other Factors			

**Table 17. Dropout Information, Pivotal Bioequivalence Study**

Study No.				
Subject No.	Reason for dropout/replacement	Period	Replaced?	Replaced with



**Table 18. Study Adverse Events, Pivotal Bioequivalence Study**

Body System/Adverse Event	Reported Incidence by Treatment Groups		
	Study No.		
	Test Product A: N=	Reference Product B: N=	Not Assignable N=
Total	N (%)	N (%)	N (%)

**Table 19. Protocol Deviations, Pivotal Bioequivalence Study**

Study No.		
Type	Subject #s (Test)	Subject #s (Ref.)

**Table 20. Area Under the Effect Curve and 90% Confidence Intervals**

Name of Drug Product Dose: [XXX µL per site – Non Occluded/Occluded, X minutes] Pharmacodynamic Parameters, Area Under the Effective-Dose Curve, Point Estimates and 90% Confidence Intervals (Locke’s Method)				
Pivotal (Vasoconstrictor Assay) Study (Study No.)				
Number of Subjects <sup>3</sup>	AUEC(0-24h)		Point Estimate	90% CI
	Test	Reference		

**Table 21. Test Product Formulation**

Ingredient	Function	% w/w

<sup>3</sup> Number of subjects who meet the criterion of (AUEC at D2)/(AUEC at D1) ≥ 1.25

**V. SAS Transport Formatted Tables for Data Submission for Pilot Dose Duration-Response Study and Pivotal Bioequivalence Study**

**Definitions:**

Variable Name	Variable Label	Variable Type	Notes
<b>DD</b>	Dose Duration	Numeric (minutes)	A dose measured as the duration of exposure of the drug to the skin over a specified time period
<b>ED50</b>	Half-Maximal Effect Dose	Numeric (minutes)	The dose duration at which half-maximal skin blanching effect occurs
<b>D1</b>	Shorter Dose Duration Calibrator	Numeric (minutes)	The dose duration equal to one-half of the ED50
<b>D2</b>	Longer Dose Duration Calibrator	Numeric (minutes)	The dose duration equal to two times the ED50

**V.1 Pilot Dose Duration-Response Study Data Submission Format**

**Table 22. Chromameter Raw Data**

Subject	Time after drug removal (hours)	DD0 (Untreated sites)	DD1	DD2	DD3	DDn
1	Baseline (pre-dose)*					
1	0					
1	0.5					
1	1					
1	n					
2	Baseline (pre-dose)					
2	0					
2	0.5					
2	1					
2	n					
n	Baseline (pre-dose)					
n	0					
n	0.5					

n	1					
n	n					

\*Baseline reading is within one hour prior to drug application

**Example:**

Subject	Time after drug removal (hours)	DD0 (Untreated sites)	DD1	DD2	DD3	DDn
1	Baseline (pre-dose)	9.86	10.36	9.59	9.34	9.43
1	0	9.99	9.89	8.77	8.66	9.6
1	0.5	10.10	10.38	9.35	8.53	9.99
1	1	9.52	10.32	9.27	8.04	9.93
1	n	9.65	10.04	9.82	9.82	10.23
2	Baseline (pre-dose)	10.12	8.89	9.18	9.24	9.15
2	0	10.28	8.28	9.61	9.54	9.24
2	0.5	10.25	8.36	9.30	10.24	10.52
2	1	10.68	7.89	8.92	10.34	10.78
2	n	11.21	8.03	10.61	11.40	10.89

**Table 23. Baseline-Adjusted Data**

Subject	Time after drug removal (hours)	DD0 (Untreated sites)	DD1	DD2	DD3	DDn
1	0					
1	0.5					
1	1					
1	n					
2	0					
2	0.5					
2	1					
2	n					
n	0					
n	0.5					
n	1					
n	n					

**Table 24. Baseline-Adjusted, Untreated Control Site-Corrected Data**

Subject	Time after drug removal (hours)	DD1	DD2	DD3	DDn
1	0				
1	0.5				
1	1				
1	n				
2	0				
2	0.5				
2	1				
2	n				
n	0				
n	0.5				
n	1				
n	n				

**Table 25. Area Under Effect Curve Data, All Subjects at Each Dose Duration**

Subject	DD1	DD2	DD3	DDn
1				
2				
n				

**V.2 Pivotal Bioequivalence Study Data Submission Format**

**Table 26. Chroma Meter Raw Data**

Subject	Time after drug removal (hours)	DD0 (Untreated sites)	D1	D2	ED50 (T)	ED50 (R)
1	Baseline (pre-dose)					
1	0					
1	0.5					
1	1					
1	n					
2	Baseline (pre-dose)					
2	0					
2	0.5					
2	1					
2	n					

n	Baseline(pre-dose)					
n	0					
n	0.5					
n	1					
n	n					

**Table 27. Baseline-Adjusted Data**

Subject	Time after drug removal (hours)	DD0 (Untreated sites)	D1	D2	ED50 (T)	ED50 (R)
1	0					
1	0.5					
1	1					
1	n					
2	0					
2	0.5					
2	1					
2	n					
n	0					
n	0.5					
n	1					
n	n					

**Table 28. Baseline-Adjusted, Untreated Control Site-Corrected Data**

Subject	Time after drug removal (hours)	D1	D2	ED50 (T)	ED50 (R)
1	0				
1	0.5				
1	1				
1	n				
2	0				
2	0.5				
2	1				
2	n				
n	0				
n	0.5				
n	1				
n	n				

**Table 29. Area Under Effect Curve Data, All Subjects at Each Dose Duration**

<b>Subject</b>	<b>D1</b>	<b>D2</b>	<b>ED50 (T)</b>	<b>ED50 (R)</b>
1				
2				
n				