A Primer on Generic Drugs and Bioequivalence: an overview of the generic drug approval process

Division of Bioequivalence II

Reviewer

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What is a Generic Drug?

A copy of a brand-name drug, which must have the:

same quality same safety same strength



Both brand name and generic drugs:

are approved by the FDA must meet the same FDA standards for quality

Generic equivalents for a brand name drug are listed in the "Electronic Orange Book"

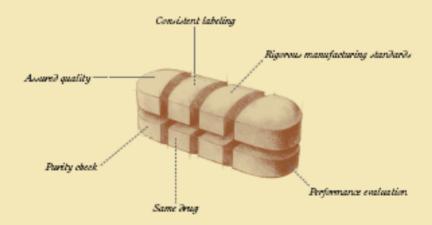


Myths about Generic Drugs

- Generics...are not as safe
- Generics...are not as potent
- Generics...take longer to act in the body
- Generics...are made in sub-standard manufacturing facilities

Think it's easy becoming a generic drug

in America?
Think again.



FDA ensures that your generic drug is safe and effective. All generic drugs are put through a rigorous, multi-step approval process. From quality and performance to manufacturing and labeling, everything must meet FDA's high standards. We make it tough to become a generic drug in America so it's easy for you to feel confident.

Visit www.fda.gov/cder/ or call 1-888-INFO-FDA to learn more.

Generic Drugs: Safe. Effective. FDA Approved. U.S. Taxal and Drug Ad

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES



FDA Legislative Support for Generic Drugs

The Drug Price Competition and Patent Term Restoration Act of 1984, commonly known as the Hatch-Waxman Act, made ANDAs possible by creating a compromise in the drug industry. Generic drug companies gained greater access to the market for prescription drugs, and brand-name companies gained restoration of patent life of their products lost during the FDA's approval process.



Generic Competition

It is essential to have brand-name and generic drugs available

to meet the patient demand

to keep insurance premiums down

to save consumers \$10+ billion yearly

generics represent 65% of the total prescriptions dispensed in the US



Patent Protection

A patent:

Protects the investment of the drug company that developed the brand-name drug

Gives the drug company the sole right to sell the drug while the patent is in effect



Patent Protection

When the patent on a brand-name drug nears expiration, drug companies that want to manufacture a generic can apply to the FDA to sell a generic version of the drug.

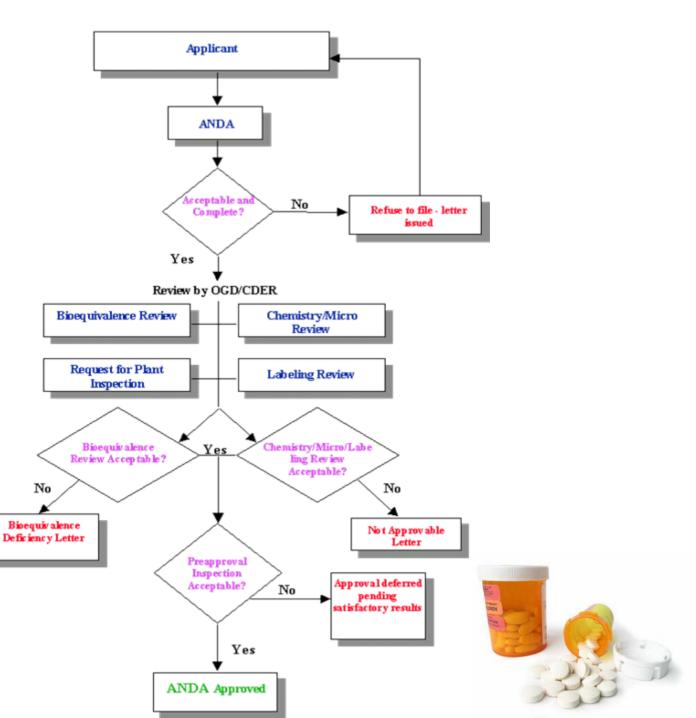


Generic Review

- Brand Name Drug (NDA) Requirements
- 1. Chemistry
- 2. Manufacturing
- 3. Controls
- 4. Labeling
- 5. Testing
- 6. Animal Studies
- 7. Clinical Studies
- 8. Bioavailability

- Generic Drug (ANDA)
 Requirements
- 1. Chemistry
- 2. Manufacturing
- 3. Controls
- 4. Labeling
- 5. Testing
- 6. Bioequivalence

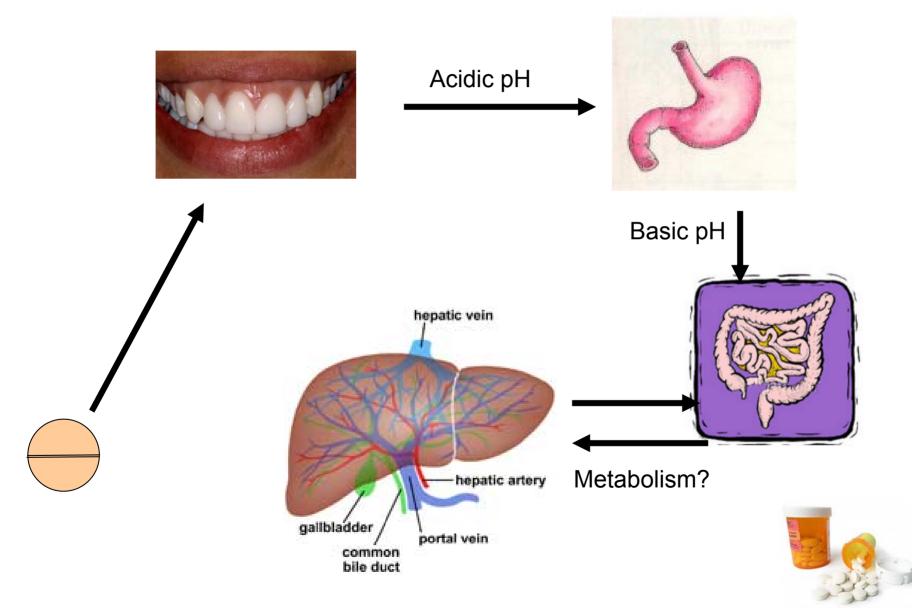
Generic Review Process



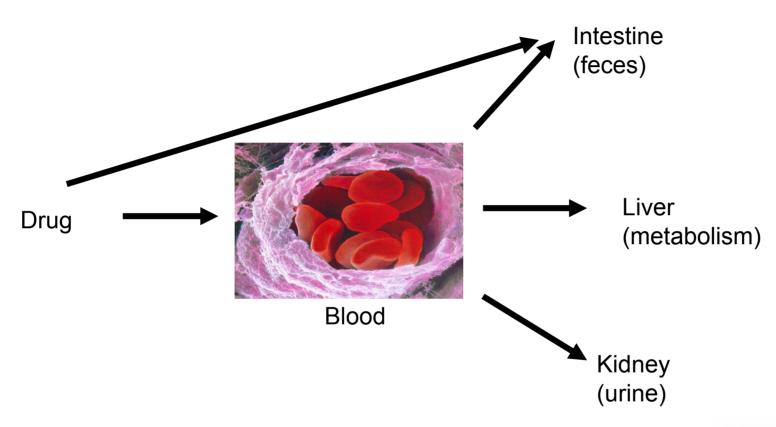
The Bioequivalence Review Process



Path of Drug: From Tablet to Blood



Pathways of Drug Elimination





Definition of Bioequivalence

The absence of a significant difference in the rate and extent to which the active ingredient or active moiety in pharmaceutical equivalents or pharmaceutical alternatives becomes available at the site of drug action when administered at the same molar dose under similar conditions in an appropriately designed study.

Definition from 21 CFR § 320.1



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Rate is Essentially Measured by Cmax

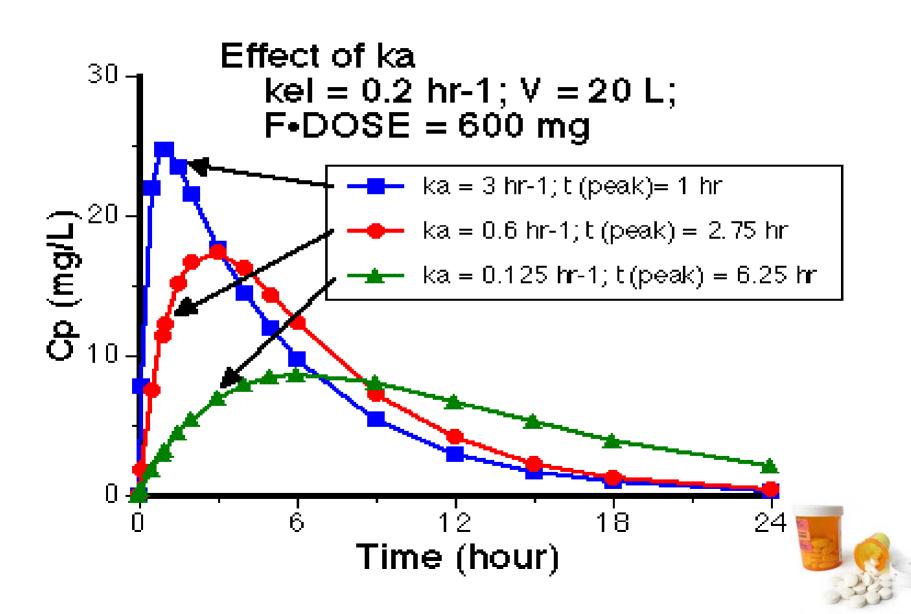
Cmax is the maximum observed concentration

Cmax tends to have higher variability

Need adequate sampling time-points



Cmax with Varying Absorption Rates



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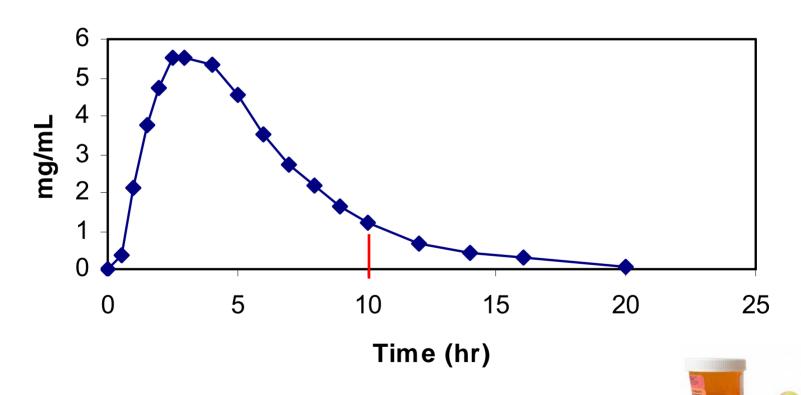
Extent of Absorption is measured by Area Under Curve (AUC)

 AUCt is a measure of the total exposure of drug to the body up to the last sampling time

 AUCinf is a theoretical measure of the total exposure of drug to the body from administration till all the drug is eliminated

Extent of absorption is Measured by Area Under Curve (AUC)

Plasma Concentration Profile of Drug X

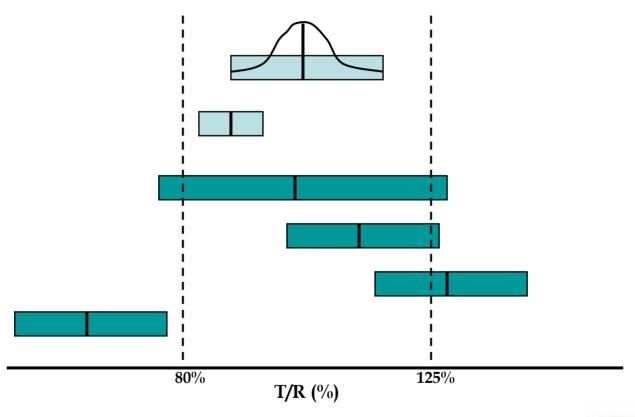


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Possible BE Results (90% CI)





Example of Data Output

Least Squares Geometric Means, Ratio of Means, and 90% Confidence Intervals

6926.21	7073.05	0.98	88.52-108.32
7272.94	7442.56	0.98	88.79-107.55
1014.78	1067.66	0.95	87.18-103.62



General Methods for Establishing BE of Solid Oral Dosage Forms

In Vivo

- Pharmacokinetic
 - Cmax, AUCt, and AUCinf
- Pharmacodynamic
 - Useful when drug levels can not be measured or are not relevant

In Vitro

- Dissolution
 - Non Bio-problem drugs, non-bio strengths
- BCS
 - Highly permeable, Highly Soluble Drugs



How is a Pharmacokinetic (PK) BE Study Conducted?

Study Design

 Need a study design to allow us to assess absorption and differentiate between formulations



2-way Single Dose Crossover Design

- Two treatments:
 - single dose of test product (A)
 - single dose of RLD (B)
 - two periods
 - two sequences: AB and BA

 The subjects are randomly assigned to the sequences

2-way Single Dose Crossover Design

Sequence I

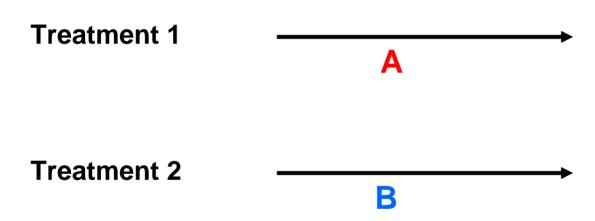
Sequence II





Other Designs

Parallel Design



- Replicate Design
 - 4 period (ABAB and BABA)



Types of in vivo BE Studies

Fasting Study

Non-fasting (a.k.a. Fed) Study

Sprinkled-fasting (or fed) Study



Components of in vivo BE Study

Clinical

Bioanalytical

Statistical



Clinical Study Considerations

- Normal healthy subjects
 - Exception: patients
 - Male and Female
 - Racially diverse
- Strength of the test drug chosen
- Sampling time
- Protocol deviations
- Adverse event monitoring
- If fed study: high fat, high calorie breakfast



Statistical Considerations

- Subjects were included/excluded based on SOP for statistical analysis
 - Emesis
 - First non-zero concentration > 5% of its Cmax
 - Pre-dose concentration
 - Parent vs. metabolite
- 90% Confidence Interval (CI) acceptance criteria is 80.00-125.00% for the test/reference ratio for all three parameters AUC_t, AUC_{inf}, and C_{max}

Dissolution Testing

Definition of dissolution

noun: the process of going into solution; "the dissolving of salt in water" [synonym: dissolving]

Importance of dissolution

- Bioavailability information
- Batch to batch consistency
- In vitro process



Dissolution Testing (contd.)

Use of dissolution in Generic drugs

- In vitro characterization
- Bio-waiver
- BCS drugs

About dissolution testing

- Apparatus
- Media
- Volume
- Speed
- Time



Dissolution Testing (contd.)

Dissolution profile comparison

- Test vs. test; RLD vs. RLD
- Different type of release products
- Dose dumping (in different pH and alcohol)
- f2 similarity factor calculation: f2≥ 50 is considered similar

Setting of dissolution specifications

- Immediate release products
- Delayed release products





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Last Updated: March 30, 2006

S Local intranet

Bio-waivers

 The cost of conducting a bioequivalence study is quite expensive

Some drug products have several strengths

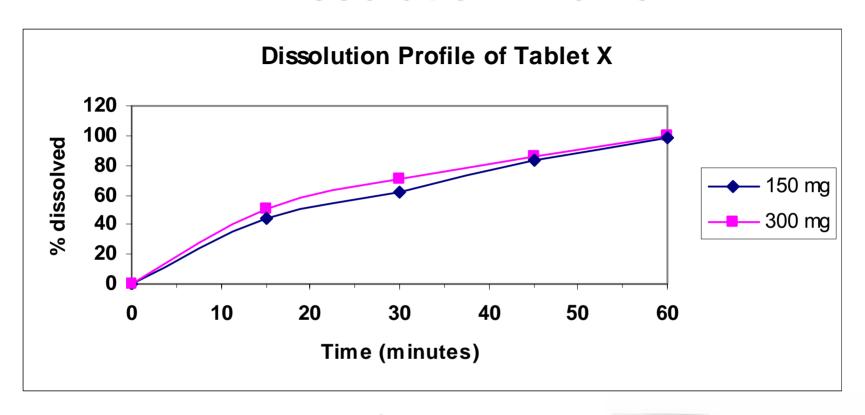
Waivers are granted for the non-bio strengths

Formulation Data

Components	150 mg (mg/tab)	300 mg (mg/tab)
Core Components		
Active, USP	166.65 (71.21%)	333.3 (71.21%)
Ethyl Cellulose, NF	15.8 (6.75%)	31.6 (6.75%)
Alginic Acid, NF	20.0 (8.55%)	40.0 (8.55%)
Corn Starch, NF	8.75 (3.74%)	17.5 (3.74%)
Microcrystalline Cellulose, NF (Avicel PH-102)	12.5 (5.34%)	25.0 (5.34%)
Sodium Lauryl Sulfate, NF	0.75 (0.32%)	1.50 (0.32%)
Magnesium Stearate, NF	2.55 (1.09%)	5.10 (1.09%)
Tablet Core Weight	227.0	454.0
Film Coating Components		
Opadry II Pink	6.82 (2.91%)	N/A
Opadry II Red	N/A	13.61 (<mark>2.91</mark> %)
Opadry Clear	0.21 (0.09%)	0.41 (0.09%)
Purified Water USP		
Film coated tablet weight	234.03	468.02



Dissolution Profile



$$f2 = 62.3$$



Additional Information

www.fda.gov/cder/ogd

http://www.fda.gov/cder/ob/default.htm



Acknowledgements

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Questions



