

CENTER FOR DRUG EVALUATION AND RESEARCH

Approval Package for:

APPLICATION NUMBER:
ANDA 201764

Name: Fluocinolone Acetonide Topical Oil, 0.01%
(Scalp Oil)

Sponsor: Identi Pharmaceuticals Inc.

Approval Date: October 17, 2011

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

ANDA 201764

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APPLICATION NUMBER:

ANDA 201764

APPROVAL LETTER



ANDA 201764

SciRegs International Inc.
U.S. Agent for: Identi Pharmaceuticals Inc.
Attention: Jeanne Taborsky
President & CEO
6333 Summercrest Drive
Columbia, MD 21045

Dear Madam:

This is in reference to your abbreviated new drug application (ANDA) dated November 5, 2010, submitted pursuant to section 505(j) of the Federal Food, Drug, and Cosmetic Act (the Act), for Fluocinolone Acetonide Topical Oil, 0.01% (Body Oil).

Reference is also made to your amendments dated December 29, 2010; and January 10, January 13, May 12, August 22, September 29, and October 7, 2011.

We have completed the review of this ANDA and have concluded that adequate information has been presented to demonstrate that the drug is safe and effective for use as recommended in the submitted labeling. Accordingly the ANDA is approved, effective on the date of this letter. The Division of Bioequivalence has determined your Fluocinolone Acetonide Topical Oil, 0.01% (Body Oil) to be bioequivalent and, therefore, therapeutically equivalent to the reference listed drug product (RLD), Derma-Smothe/FS Topical Oil, 0.01% (Body Oil), of Hill Dermaceuticals Inc.

Under section 506A of the Act, certain changes in the conditions described in this ANDA require an approved supplemental application before the change may be made.

Please note that if FDA requires a Risk Evaluation & Mitigation Strategy (REMS) for a listed drug, an ANDA citing that listed drug also will be required to have a REMS. See section 505-1(i) of the Act.

Postmarketing reporting requirements for this ANDA are set forth in 21 CFR 314.80-81 and 314.98. The Office of Generic Drugs

should be advised of any change in the marketing status of this drug.

Promotional materials may be submitted to FDA for comment prior to publication or dissemination. Please note that these submissions are voluntary. If you desire comments on proposed launch promotional materials with respect to compliance with applicable regulatory requirements, we recommend you submit, in draft or mock-up form, two copies of both the promotional materials and package insert(s) directly to:

Food and Drug Administration
Center for Drug Evaluation and Research
Division of Drug Marketing, Advertising, and Communications
5901-B Ammendale Road
Beltsville, MD 20705

We call your attention to 21 CFR 314.81(b)(3) which requires that all promotional materials be submitted to the Division of Drug Marketing, Advertising, and Communications with a completed Form FDA 2253 at the time of their initial use.

As soon as possible, but no later than 14 days from the date of this letter, submit, using the FDA automated drug registration and listing system (eLIST), the content of labeling [21 CFR 314.50(l)] in structured product labeling (SPL) format, as described at

<http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm>, that is identical in content to the approved labeling (including the package insert, and any patient package insert and/or Medication Guide that may be required). Information on submitting SPL files using eLIST may be found in the guidance for industry titled "SPL Standard for Content of Labeling Technical Qs and As" at <http://www.fda.gov/downloads/DrugsGuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf>. The SPL will be accessible via publicly available labeling repositories.

Sincerely yours,

{See appended electronic signature page}

Keith Webber, Ph.D.
Deputy Director
Office of Pharmaceutical Science
Center for Drug Evaluation and Research

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

ROBERT L WEST

10/17/2011

Deputy Director, Office of Generic Drugs
for Keith Webber, Ph.D.

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
ANDA 201764

LABELING

Fluocinolone Acetonide 0.01% Topical Oil (BODY OIL)

HIGHLIGHTS OF THE PRESCRIBING INFORMATION

These highlights do not include all the information needed to use Fluocinolone Acetonide 0.01% Topical Oil safely and effectively. See full prescribing information for Fluocinolone Acetonide 0.01% Topical Oil.

Fluocinolone Acetonide 0.01% Topical Oil, (Body Oil)
For topical use only
Initial U.S. Approval: 1988

RECENT MAJOR CHANGES

Indication and Usage, Pediatric Patients with Atopic Dermatitis (1.2) 11/2007

INDICATION AND USAGE

Fluocinolone Acetonide 0.01% Topical Oil is a corticosteroid indicated for the topical treatment of atopic dermatitis in adult patients (1.1) and moderate to severe atopic dermatitis in pediatric patients 3 months and older for up to 4 weeks (1.2).

Limitations of Use:

- Apply the least amount to cover affected areas. Discontinue when disease is controlled. (1.3)
- Do not use in the diaper area. (1.3)
- Do not use on the face, axillae, or groin. (1.3, 6.2, 8.4)

DOSAGE AND ADMINISTRATION

Fluocinolone acetonide 0.01% topical oil is not for oral, ophthalmic, or intravaginal use. (2)

- Adult patients: Apply to affected areas 3 times daily. (2.1)
- Pediatric patients: Moisten skin and apply to affected areas twice daily for up to 4 weeks. (2.2)

FULL PRESCRIBING INFORMATION: CONTENTS*

- INDICATION AND USAGE**
 - Adult Patients with Atopic Dermatitis
 - Pediatric Patients with Atopic Dermatitis
 - Limitations of Use
- DOSAGE AND ADMINISTRATION**
 - Adult Patients with Atopic Dermatitis
 - Pediatric Patients with Atopic Dermatitis
- DOSAGE FORM AND STRENGTHS**
- CONTRAINDICATIONS**
- WARNINGS AND PRECAUTIONS**
 - Hypothalamic-Pituitary-Adrenal Axis Suppression
 - Local Adverse Reactions with Topical Corticosteroids
 - Allergic Contact Dermatitis with Topical Corticosteroids
 - Concomitant Skin Infections
 - Use in Peanut-Sensitive Individuals
- ADVERSE REACTIONS**
 - Clinical Studies Experience: Evaluation of Facial Use in Pediatric Subjects

DOSAGE FORM AND STRENGTHS

Fluocinolone Acetonide 0.01% Topical Oil (Body Oil) is supplied in bottles containing 4 fluid ounces. (3)

CONTRAINDICATIONS

None (4).

WARNINGS AND PRECAUTIONS

- Topical corticosteroids can produce reversible HPA axis suppression, Cushing's syndrome, hyperglycemia, and glucosuria. (5.1)
- Systemic absorption may require evaluation for hypothalamic-pituitary-adrenal (HPA) axis suppression. (5.1)
- Modify use should HPA axis suppression develop. (5.1)
- Potent corticosteroids, use on large areas, prolonged use or occlusive use may increase systemic absorption. (5.1)
- Local adverse reactions may include atrophy, striae irritation, acneiform eruptions, hypopigmentation, and allergic contact dermatitis and may be more likely with occlusive use or more potent corticosteroids (5.2, 5.3, 6.1)
- Children may be more susceptible to systemic toxicity from equivalent doses. (5.1, 8.4)

ADVERSE REACTIONS

The most common adverse reactions (≥ 5%) were cough (20%), rhinorrhea (13%), pyrexia (10%), telangiectasia (7%), nasopharyngitis (7%), and hypopigmentation (7%).

To report SUSPECTED ADVERSE REACTIONS, contact Amneal Pharmaceuticals at 1-877-835-5472 or FDA at 1-800-FDA-1088 or www.fda.gov/medwatch.

See 17 for PATIENT COUNSELING INFORMATION

- Clinical Studies Experience: Evaluation in Pediatric Subjects 3 months to 2 years old
- USE IN SPECIFIC POPULATIONS**
 - Pregnancy
 - Nursing Mothers
 - Pediatric Use
- OVERDOSAGE**
- DESCRIPTION**
- CLINICAL PHARMACOLOGY**
 - Mechanism of Action
 - Pharmacokinetics
- NONCLINICAL TOXICOLOGY**
 - Carcinogenesis, mutagenesis, impairment of fertility
- HOW SUPPLIED / STORAGE AND HANDLING**
- PATIENT COUNSELING INFORMATION**
 - Instructions

* Sections or subsections omitted from the Full Prescribing Information are not listed.

FULL PRESCRIBING INFORMATION

- INDICATIONS AND USAGE**
 - Adult Patients with Atopic Dermatitis**
 Fluocinolone Acetonide 0.01% Topical Oil is indicated for the topical treatment of atopic dermatitis in adult patients.
 - Pediatric Patients with Atopic Dermatitis**
 Fluocinolone Acetonide 0.01% Topical Oil is indicated for the topical treatment of moderate to severe atopic dermatitis in pediatric patients, 3 months and older for up to 4 weeks. Safety and effectiveness in pediatric patients younger than 3 months of age have not been established.
 - Limitations of Use**
 Apply the least amount of Fluocinolone Acetonide 0.01% Topical Oil needed to cover the affected areas. As with other corticosteroids, Fluocinolone Acetonide 0.01% Topical Oil should be discontinued when control of disease is achieved. Contact the physician if no improvement is seen within 2 weeks.
 Fluocinolone Acetonide 0.01% Topical Oil should not be applied to the diaper area; diapers or plastic pants may constitute occlusive use.
 Fluocinolone Acetonide 0.01% Topical Oil should not be used on the face, axillae, or groin unless directed by the physician. Application to intertriginous areas should be avoided due to the increased risk of local adverse reactions. [See Adverse Reactions (6) and Use in Specific Populations (8.4)].
- DOSAGE AND ADMINISTRATION**
 Fluocinolone acetonide 0.01% topical oil is not for oral, ophthalmic, or intravaginal use.
The dosing of fluocinolone acetonide 0.01% topical oil is different for adult and pediatric patients.
 - Adult Patients with Atopic Dermatitis**
 Apply fluocinolone acetonide 0.01% topical oil as a thin film to the affected areas **three times daily**.
 - Pediatric Patients with Atopic Dermatitis**
 Moisten skin and apply fluocinolone acetonide 0.01% topical oil as a thin film to the affected areas **twice daily for up to four weeks**.
- DOSAGE FORMS AND STRENGTHS**
 Fluocinolone Acetonide 0.01% Topical Oil (Body Oil) is supplied in 4 fluid ounce bottles with a net content of 118.28 mL.
- CONTRAINDICATIONS**
 None
- WARNINGS AND PRECAUTIONS**
 - Hypothalamic-Pituitary-Adrenal Axis Suppression**
 Systemic absorption of topical corticosteroids can produce reversible hypothalamic-pituitary-adrenal (HPA) axis suppression with the potential for glucocorticosteroid insufficiency. Cushing's syndrome, hyperglycemia, and glucosuria can also be produced by systemic absorption of topical corticosteroids.
 Because of the potential for systemic absorption, use of topical corticosteroids may require that patients be periodically evaluated for HPA axis suppression. The ACTH stimulation test may be helpful in evaluating patients for HPA axis suppression.
 If HPA axis suppression is documented, an attempt should be made to withdraw the drug, to reduce the frequency of application, or to substitute a less potent corticosteroid. Recovery of HPA axis function is generally prompt upon discontinuation of topical corticosteroids.
 Conditions which increase systemic absorption include the use of more potent corticosteroids, use over large surface areas, use over prolonged periods, and use of occlusive dressings. Manifestations of adrenal insufficiency may require supplemental systemic corticosteroids.
 Children may be more susceptible to systemic toxicity from equivalent doses due to their larger skin surface to body mass ratios. [See Use in Specific Populations (8.4)]

- Local Adverse Reactions with Topical Corticosteroids**
 Local adverse reactions may occur with use of topical corticosteroids and may be more likely to occur with occlusive use, prolonged use or use of higher potency corticosteroids. Some local adverse reactions may be irreversible. Reactions may include atrophy, striae, telangiectasias, burning, itching, irritation, dryness, folliculitis, acneiform eruptions, hypopigmentation, perioral dermatitis, allergic contact dermatitis, secondary infection, and miliaria. [See Adverse Reactions (6.1)]
- Allergic Contact Dermatitis with Topical Corticosteroids**
 Allergic contact dermatitis to any component of topical corticosteroids is usually diagnosed by a failure to heal rather than a clinical exacerbation. Clinical diagnosis of allergic contact dermatitis can be confirmed by patch testing.
- Concomitant Skin Infections**
 Concomitant skin infections should be treated with an appropriate antimicrobial agent. If the infection persists unchanged, fluocinolone acetonide topical oil 0.01% should be discontinued until the infection has been adequately treated.
- Use in Peanut-Sensitive Individuals**
 Physicians should use caution in prescribing fluocinolone acetonide 0.01% topical oil for peanut-sensitive individuals. [See Description (11)]
 Should signs of hypersensitivity present (wheal and flare reactions, pruritus, or other manifestations), or should disease exacerbations occur, fluocinolone acetonide 0.01% topical oil should be discontinued immediately and appropriate therapy instituted.

- ADVERSE REACTIONS**
 Because clinical trials are conducted under widely varying conditions, adverse reaction rates observed in the clinical trials of a drug cannot be directly compared to rates in the clinical trials of another drug and may not reflect the rates observed in practice.

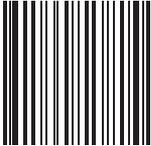
- Clinical Studies Experience: Evaluation of Facial Use in Pediatric Subjects**
 An, open-label, study was conducted in 58 children with moderate to severe atopic dermatitis (2 to 12 years old) to evaluate the safety of fluocinolone acetonide 0.01% topical oil when applied to the face twice daily for 4 weeks. The following adverse reactions were reported:

Incidence of Adverse Reaction (%)
N=58

Adverse Reaction (AR)*	# of subjects (%)	Day 14	Day 28**	Day 56***
Any AE	15 (26)	6 (10)	7 (12)	7 (12)
Telangiectasia	5 (9)	3 (5)	4 (7)	2 (4)
Erythema	3 (5)			3 (5)
Itching	3 (5)			3 (5)
Irritation	3 (5)			3 (5)
Burning	3 (5)			3 (5)
Hypopigmentation	2 (4)	2 (4)		
Shiny Skin	1 (2)		1 (2)	
Secondary atopic dermatitis	1 (2)			1 (2)
Papules and pustules	1 (2)			1 (2)
Keratosis pilaris	1 (2)			1 (2)
Folliculitis	1 (2)		1 (2)	
Facial herpes simplex	1 (2)	1 (2)		
Acneiform eruption	1 (2)		1 (2)	
Ear infection	1 (2)		1 (2)	

*The number of individual adverse reactions reported does not necessarily reflect the number of individual subjects, since one subject could have multiple reporting of an adverse reaction.
 **End of Treatment
 ***Four Weeks Post Treatment

704-1140



Fluocinolone Acetonide 0.01% Topical Oil (BODY OIL)
 Rev. 05-2011

6.2. Clinical Studies Experience: Evaluation in Pediatric Subjects 3 months to 2 years old

An open-label safety study was conducted in 29 children to assess the HPA axis by ACTH stimulation testing following use of fluocinolone acetonide 0.01% topical oil twice daily for 4 weeks. The following adverse reactions were reported in the study [See *Use in Specific Populations* (8.4)]:

Adverse Reactions (%)
N=30*

Adverse Reactions	# of subjects (%)
Diarrhea	1 (3)
Vomiting	1 (3)
Pyrexia	3 (10)
Abscess	1 (3)
Molluscum	1 (3)
Nasopharyngitis	2 (7)
URI	1 (3)
Otitis media	1 (3)
Cough	6 (20)
Rhinorrhea	4 (13)
Atopic dermatitis	1 (3)
Eczema	1 (3)
Hyperpigmentation	1 (3)
Hypopigmentation	2 (7)
Rash	1 (3)

*Includes one subject who withdrew at Week 2

8. USE IN SPECIFIC POPULATIONS

8.1. Pregnancy

Pregnancy Category C: Corticosteroids have been shown to be teratogenic in laboratory animals when administered systemically at relatively low dosage levels. Some corticosteroids have been shown to be teratogenic after dermal application in laboratory animals.

There are no adequate and well-controlled studies in pregnant women on teratogenic effects from fluocinolone acetonide 0.01% topical oil. Therefore, fluocinolone acetonide 0.01% topical oil should be used during pregnancy only if the potential benefit justifies the potential risk to the fetus.

8.3. Nursing Mothers

Systemically administered corticosteroids appear in human milk and could suppress growth, interfere with endogenous corticosteroid production, or cause other untoward effects. It is not known whether topical administration of corticosteroids could result in sufficient systemic absorption to produce detectable quantities in human milk. Because many drugs are excreted in human milk, caution should be exercised when fluocinolone acetonide 0.01% topical oil is administered to a nursing woman.

8.4. Pediatric Use

8.4.1. Systemic Adverse Reactions in Pediatric Patients

HPA axis suppression, Cushing's syndrome, and intracranial hypertension have been reported in children receiving topical corticosteroids. Manifestations of adrenal suppression in children include linear growth retardation, delayed weight gain, low plasma cortisol levels, and subnormal response to ACTH stimulation. Manifestations of intracranial hypertension include bulging fontanelles, headaches, and bilateral papilledema.

Because of a higher ratio of skin surface area to body mass, children are at a greater risk for systemic adverse reactions than are adults when treated with topical corticosteroids. [See *Warnings and Precautions* (5.1)]

8.4.2. Evaluation in Peanut-Sensitive Pediatric Subjects

A clinical study was conducted to assess the safety of fluocinolone acetonide 0.01% topical oil, which contains refined peanut oil, on subjects with known peanut allergies. The study enrolled 13 subjects with atopic dermatitis, 6 to 17 years of age. Of the 13 subjects, 9 were Radioallergen Sorbent Test (RAST) positive to peanuts and 4 had no peanut sensitivity (controls). The study evaluated the subjects' responses to both prick test and patch test utilizing peanut oil NF, fluocinolone acetonide 0.01% topical oil and histamine/saline controls. Subjects were also treated with fluocinolone acetonide topical oil 0.01% twice daily for 7 days. Prick test and patch test results for all 13 patients were negative to fluocinolone acetonide 0.01% topical oil and the refined peanut oil. One of the 9 peanut-sensitive patients experienced an exacerbation of atopic dermatitis after 5 days of fluocinolone acetonide 0.01% topical oil. The bulk peanut oil NF, used in fluocinolone acetonide 0.01% topical oil is heated at 475°F for at least 15 minutes, which should provide for adequate decomposition of allergenic proteins. [See *Description* (11)]

8.4.3. Evaluation in Pediatric Subjects 2 to 6 years old

Open-label safety studies were conducted on 33 children (20 subjects ages 2 to 6 years, 13 subjects ages 7 to 12 years) with moderate to severe stable atopic dermatitis. Subjects were treated with fluocinolone acetonide 0.01% topical oil twice daily for 4 weeks. Baseline body surface area involvement was 50% to 75% in 15 subjects and greater than 75% in 18 subjects. Morning pre-stimulation cortisol and post-ACTH stimulation cortisol levels were obtained in each subject at the beginning of the trial and at the end of 4 weeks of treatment. At the end of treatment, 4 out of 18 subjects aged 2 to 5 years showed low pre-stimulation cortisol levels (3.2 to 6.6 µg/dL; normal: cortisol > 7 µg/dL) but all had normal responses to 0.25 mg of ACTH stimulation (cortisol > 18 µg/dL).

8.4.4. Evaluation in Pediatric Subjects 3 months to 2 years old

An open-label safety study was conducted in 29 children (7 subjects ages 3 to 6 months, 7 subjects ages > 6 to 12 months and 15 subjects ages > 12 months to 2 years of age) to assess the HPA axis by ACTH stimulation testing following use of fluocinolone acetonide 0.01% topical oil twice daily for 4 weeks. All subjects had moderate to severe atopic dermatitis with disease involvement on at least 20% body surface area. Baseline body surface area involvement was 50% to 75% in 11 subjects and greater than 75% in 7 subjects. Morning pre-stimulation and post-ACTH stimulation cortisol levels were obtained in each subject at the beginning of the trial and at the end of 4 weeks of treatment. All subjects had normal responses to 0.125 mg of ACTH stimulation (cortisol > 18 µg/dL).

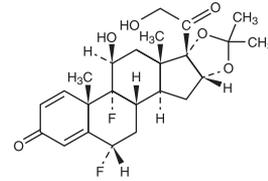
10. OVERDOSAGE

Topically applied corticosteroids can be absorbed in sufficient amounts to produce systemic effects, including under conditions of normal use. [See *Warnings and Precautions* (5.1) and *Use in Specific Populations* (8.4)].

11. DESCRIPTION

Fluocinolone Acetonide 0.01% Topical Oil (Body Oil) contains fluocinolone acetonide [(6 α , 11 β , 16 α)-6,9-difluoro-11,21-dihydroxy-16,17]-(1-methylethylidene) bis(oxy)-pregna-1,4-diene-3,20-dione, cyclic 16,17 acetal with acetone), a synthetic corticosteroid for topical dermatologic use. This formulation is also marketed as Fluocinolone Acetonide 0.01% Topical Oil (Scalp Oil) for use with shower caps for treatment of scalp psoriasis in adults and as fluocinolone acetonide oil, 0.01% for

treatment of chronic eczematous external otitis. Chemically, fluocinolone acetonide is C₂₄H₃₀F₂O₆. It has the following structural formula:



Fluocinolone acetonide in Fluocinolone Acetonide 0.01% Topical Oil has a molecular weight of 452.50. It is a white crystalline powder that is odorless, stable in light, and melts at 270°C with decomposition; soluble in alcohol, acetone and methanol; slightly soluble in chloroform; insoluble in water.

Each gram of Fluocinolone Acetonide 0.01% Topical Oil contains approximately 0.11 mg of fluocinolone acetonide in a blend of oils, which contains isopropyl alcohol, isopropyl myristate, light mineral oil, oleth-2, and refined peanut oil NF.

Fluocinolone Acetonide 0.01% Topical Oil is formulated with 48% refined peanut oil NF. Physicians should use caution in prescribing Fluocinolone Acetonide 0.01% Topical Oil for peanut-sensitive individuals.

12. CLINICAL PHARMACOLOGY

12.1. Mechanism of Action

Like other topical corticosteroids, fluocinolone acetonide has anti-inflammatory, antipruritic, and vasoconstrictive properties. The mechanism of the anti-inflammatory activity of the topical steroids, in general, is unclear. However, corticosteroids are thought to act by the induction of phospholipase A2 inhibitory proteins, collectively called lipocortins. It is postulated that these proteins control the biosynthesis of potent mediators of inflammation such as prostaglandins and leukotrienes by inhibiting the release of their common precursor arachidonic acid. Arachidonic acid is released from membrane phospholipids by phospholipase A2.

12.3. Pharmacokinetics

Topical corticosteroids can be absorbed from intact healthy skin. The extent of percutaneous absorption of topical corticosteroids is determined by many factors, including the product formulation and the integrity of the epidermal barrier. Occlusion, inflammation and/or other disease processes in the skin may increase percutaneous absorption. The use of pharmacodynamic endpoints for assessing the systemic exposure of topical corticosteroids may be necessary due to the fact that circulating levels are often below the level of detection. Once absorbed through the skin, topical corticosteroids are metabolized, primarily in the liver, and are then excreted by the kidneys. Some corticosteroids and their metabolites are also excreted in the bile.

Fluocinolone acetonide 0.01% topical oil is in the low to medium range of potency as compared with other topical corticosteroids in vasoconstrictor studies.

13. NONCLINICAL TOXICOLOGY

13.1. Carcinogenesis, mutagenesis, impairment of fertility:

Long-term animal studies have not been performed to evaluate the carcinogenic potential or the effect on fertility of fluocinolone acetonide 0.01% topical oil. Studies have not been performed to evaluate the mutagenic potential of fluocinolone acetonide, the active ingredient in fluocinolone acetonide 0.01% topical oil. Some corticosteroids have been found to be genotoxic in various genotoxicity tests (i.e. the *in vitro* human peripheral blood lymphocyte chromosome aberration assay with metabolic activation, the *in vivo* mouse bone marrow micronucleus assay, the Chinese hamster micronucleus test and the *in vitro* mouse lymphoma gene mutation assay).

16. HOW SUPPLIED / STORAGE AND HANDLING

Fluocinolone Acetonide 0.01% Topical Oil (Body Oil) is supplied in 4 fluid ounce bottles with a net content of 118.28 mL (NDC 65162-704-86).

Storage: Store upright at 25°C (68° to 77°F); excursions permitted to 15° to 30°C (59° to 86°F) [See USP Controlled Room Temperature].

17. PATIENT COUNSELING INFORMATION

17.1. Instructions

- Fluocinolone acetonide 0.01% topical oil should be used as directed by the physician. It is for external use only. Avoid contact with the eyes. In case of contact, wash eyes liberally with water.
- Fluocinolone acetonide 0.01% topical oil should not be used for any disorder other than that for which it was prescribed.
- Patients should report any worsening of their skin condition to their physician promptly.
- Fluocinolone acetonide 0.01% topical oil should not be applied under occlusion unless directed by the physician. Fluocinolone acetonide 0.01% topical oil should not be applied to the diaper area as diapers or plastic pants may constitute occlusive use.
- Fluocinolone acetonide 0.01% topical oil should not be used on the face, axillae, or groin unless directed by the physician.
- As with other corticosteroids, therapy should be discontinued when control of disease is achieved. Contact the physician if no improvement is seen within 2 weeks.
- Do not use other corticosteroid-containing products while using fluocinolone acetonide 0.01% topical oil without first consulting your physician.

Manufactured by:
Amneal Pharmaceuticals
Branchburg, NJ 08876

Distributed by:
Amneal Pharmaceuticals
Glasgow, KY 42141

Rev. 05-2011

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
ANDA 201764

LABELING REVIEWS

APPROVAL SUMMARY #1

REVIEW OF PROFESSIONAL LABELING DIVISION OF LABELING AND PROGRAM SUPPORT LABELING REVIEW BRANCH

ANDA Number: 201764

Date of Submission: **October 7, 2011**

Applicant's Name: Identi Pharmaceuticals, LLC.

Established Name: Fluocinolone Acetonide Oil, 0.01% (Body Oil)

REMS required? **NO**

MedGuides and/or PPIs (505-1(e))	<input type="checkbox"/> Yes <input type="checkbox"/> No
Communication plan (505-1(e))	<input type="checkbox"/> Yes <input type="checkbox"/> No
Elements to assure safe use (ETASU) (505-1(f)(3))	<input type="checkbox"/> Yes <input type="checkbox"/> No
Implementation system if certain ETASU (505-1(f)(4))	<input type="checkbox"/> Yes <input type="checkbox"/> No
Timetable for assessment (505-1(d))	<input type="checkbox"/> Yes <input type="checkbox"/> No

ANDA REMS acceptable?

Yes No n/a

APPROVAL SUMMARY (List the package size, strength(s), and date of submission for approval):
Do you have Final Printed Labels and Labeling?

- 1. CONTAINER (4 oz bottle)** - Satisfactory in FPL as of **October 7, 2011** electronic submission.
- 2. CARTON (4 oz bottle)** – Satisfactory in FPL as of **October 7, 2011** electronic submission.
- 3. PACKAGE INSERT** – Satisfactory in Final Print as of **October 7, 2011** electronic submission

BASIS OF APPROVAL:

- Was this approval based upon a petition? No
- What is the RLD on the 356(h) form: Derma-Smoothe/FS Topical Oil, 0.01% (Body Oil)
- NDA Number: 19-452:
- NDA Drug Name: Fluocinolone Acetonide Topical Oil, 0.01% (Body Oil)
- NDA Firm: Hill Laboratories, Inc.
- Date of Approval of NDA Insert and supplement: NDA 19- 452/S024: Approved December 12, 2007
- Has this been verified by the MIS system for the NDA? Yes
- Was this approval based upon an OGD labeling guidance? No
- Basis of Approval for the Container Labels: Side-by-side comparison
- Basis of Approval for the Carton Labeling: Side-by-side comparison
- Revisions needed post-approval: NO
- Comments: The firm has revised their insert labeling, submitted May 13, 2011, to remove the labeling statements describing the testing methodology for peanut proteins as per guidance from the agency. Please note that the Description section of the package insert mentions that the formulation is also marketed as Fluocinolone Acetonide 0.01% Topical Oil (Scalp Oil) as does the RLD. Therefore **ANDA 201764 (body oil) and ANDA 201759 (Scalp Oil) needs to be approved at the same time.**
- Patents/Exclusivities: Refer to chart below.

Patent Data – NDA 19-452

Patent No.	Patent Expiration	Use Code	Description	How Filed	Labeling Impact
			There are no unexpired patents for this product in the Orange Book Database.	II	none

Exclusivity Data– NDA 19-452

Code	Reference	Expiration	Labeling Impact
NONE	There is no unexpired exclusivity for this product in the Orange Book Database.	N/A	NONE

QUESTIONS to Chemist: Emailed question to Jim Fan: The firm states that the statement which is in the RLD labeling “**Importantly, the bulk peanut oil NF, used in fluocinolone acetonide oil is heated at 475° F for at least 15 minutes, which should provide for adequate decomposition of allergenic proteins**” does pertain to their Fluocinolone Acetonide Oil products.

The firm states that their bulk peanut oil is also heated at 475° F for at least 15 minutes.

Can you please confirm that the above statement is correct. (Answer on next page)

ANSWER: Hi, Beverly

We have asked the firm about the manufacturing process for the refined peanut oil in our Review#1 (see deficiency below):

Please provide a process description, including the processing temperature for the refined peanut oil, NF. Also, please provide a commitment statement to pledge that a supplemental application is required to change peanut oil suppliers.

In Review#2, the firm provide their response, which clearly describes the heating at 475° F for at least 15 minutes.

The firm's response: While conducting our search for raw material suppliers, we discovered a patent held by Hill Dermaceuticals for fluorouracil in topical cream containing peanut oil. A copy of the patent is provided in Module 3.3 Literature On page 2, item number 10, this patent lists Peanut Oil from Welch, Holme and Clark as one of interest that is suitable for use. Since Hill is the manufacturer of the RLD, we concluded that they are most likely using this (b) (4) Peanut Oil, NF is heated at 475° F for at least 15 minutes. Identi commits to file a supplemental application in the event that we need to change the Peanut Oil, NF vendor.

Reviewer's assessment: The firm provided a commitment statement to pledge that a supplement application is required to change peanut oil suppliers. The firm also included the processing temperature for refine peanut oil (475° F=246.1° C), which is in the temperature range specified in USP (230° C to 260° C). Based on the firm's investigation, it is quite possible, but not certain that Hill, the manufacturer of the RLD uses peanut oil from Welch, Holme and Clark. The firm's response is acceptable.

Therefore, the refined peanut oil used by Identi Pharma is indeed heated at 475° F for at least 15 minutes, according to their amendment.

Richard Chang

FOR THE RECORD:

1. MODEL LABELING

Labeling review based on the labeling of the reference listed drug, Derma-Smoothe/FS Topical Oil, 0.01% (Body Oil) manufactured by Hill Laboratories, Inc., (NDA19-452/S-024: Approved December 12, 2007.

LABELING ISSUES – Memo filed in Darrrts: This Memo was regarding the basis for the ANDA labeling carve-out of information relating to peanut protein in the labeling for fluocinolone products that reference Hill Dermaceutical's Dema-Smoothe (NDA 19-452). (b) (4)

The office of Generic Drugs recommended the statements regarding the amount of residual peanut protein and test method be removed from the insert labeling.

FDA has determined that there is no validated assay for residual peanut protein. FDA has further determined that any peanut oil that is fully refined in accordance with the USP NF process is sufficiently safe for use in topical fluocinolone products and cannot be reliably determined to be safer for peanut allergic individuals than any other peanut oil refined in accordance with the USP NF process. As a result, when manufacturers use peanut oil that is fully refined in accordance with the USP NF process, FDA has determined that the addition of a test to quantitate protein in refined peanut oil would not improve the

safety of products formulated with this excipient and will not be required. (CP response at 30.) Accordingly, FDA has determined that no product, NDA or ANDA, should reference in its labeling an unvalidated assay for peanut protein (such as the S-ELISA test or the amino acid test) that implies an additional safety benefit that has not been shown to exist.

In this case, the Hill fluocinolone labeling includes information about assays for peanut protein that have not been validated and FDA has asked Hill to remove references to these assays from the Derma-Smothe labeling. Although Hill has not yet complied with FDA’s request, FDA stands by its conclusion that, based on the information before it, the references to unvalidated assays in the Derma-Smothe labeling are misleading and should be removed. Given FDA’s conclusions about peanut oil in general and the unvalidated nature of the S-ELISA and amino acid assays as described in the Hill CP response and (b) (4) FDA believes that ANDA applicants referencing Derma-Smothe should not be required to include this unnecessary and misleading information in their labeling.

Accordingly, FDA concludes that ANDA applicants can remove references to assays for residual peanut protein from their labeling to comply with the labeling guidelines that FDA has provided to Hill. The resulting difference between ANDA and RLD labeling is a permitted difference due to difference in manufacturer within the meaning of the statute and regulations.

Labeling outcome: It has been recommended that the generic firms do not include in their labeling the statements describing the testing methodology for peanut proteins.

Remove:

Body Oil: The peanut oil used in Derma-Smooth/FS is tested for peanut proteins through amino acid analysis which can detect the quantity of amino acids to below 0.5 parts per million

and

Scalp Oil or Ear Drops: “Peanut oil used in this product is routinely tested for peanut proteins using a sandwich enzyme-linked immunosorbent assay test(S-ELISA) kit, which can detect peanut proteins to as low as 2.5 parts per million (ppm)”

2. PATENTS/EXCLUSIVITIES

Patent Data – NDA 19-452

Patent No.	Patent Expiration	Use Code	Description	How Filed	Labeling Impact
			There are no unexpired patents for this product in the Orange Book Database.	II	none

Exclusivity Data– NDA 19-452

Code	Reference	Expiration	Labeling Impact
NONE	There is no unexpired exclusivity for this product in the Orange Book Database.	N/A	NONE

3. PACKAGING CONFIGURATION

- **RLD:** Bottles containing 4 fluid ounces.
- **ANDA:** Bottles containing 4 fluid ounces.

4. CONTAINER/CLOSURE - Fluocinolone acetone oil will be marketed in the following package; 120 mL (4 oz) round (b) (4) bottle with a (b) (4) screw cap and a wrap around label. The product is placed in the carton with a white (b) (4) dispensing cap.

5. INACTIVE INGREDIENTS - There does not appear to be a discrepancy in inactives between the DESCRIPTION and the composition statement. The proposed formulation falls within the FDA guidelines for all components and contains the same components as the RLD.

6. STORAGE TEMPERATURE RECOMMENDATION COMPARISON

RLD – Store at 25°C (68°-77°F); excursions permitted to 15-30°C (59-86°F). [see USP Controlled Room Temperature] Keep tightly closed.
 ANDA – Store at 25°C (77°F); excursions permitted to 15-30°C (59-86°F). [see USP Controlled Room Temperature] Keep tightly closed.

7. FINISHED DOSAGE FORM

- RLD – liquid
- ANDA - A colorless to light straw colored liquid.

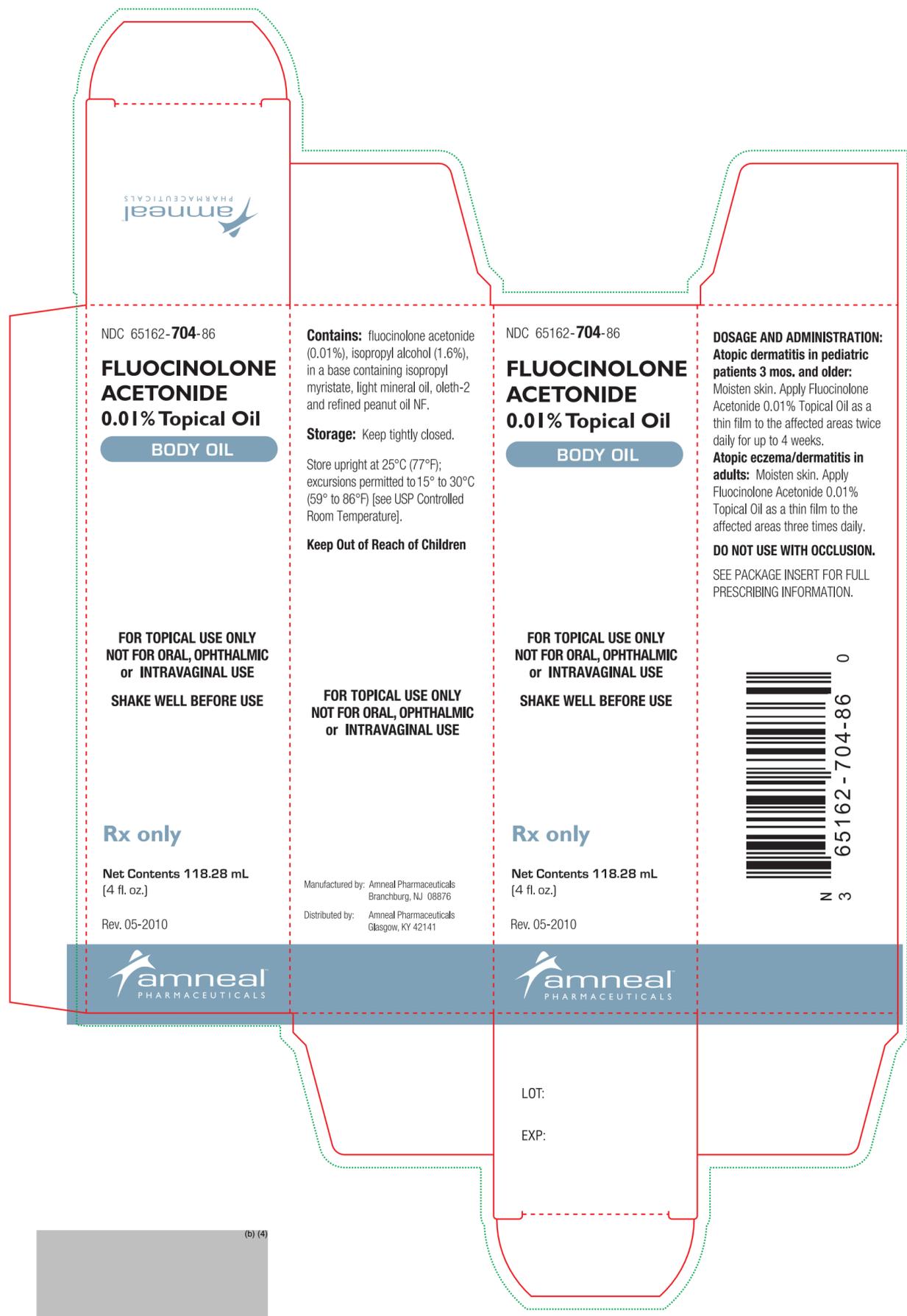
8. MANUFACTURING FACILITY OF FINISHED DOSAGE FORM

Amneal Pharmaceuticals
Branchburgh, NJ 08876

Date of Submission: October 7, 2011

Primary Reviewer: Beverly Weitzman Date:

Team Leader: John Grace Date:



NDC 65162-704-86

FLUOCINOLONE ACETONIDE 0.01% Topical Oil

BODY OIL

Contains: fluocinolone acetonide (0.01%), isopropyl alcohol (1.6%), in a base containing isopropyl myristate, light mineral oil, oleth-2 and refined peanut oil NF.

Storage: Keep tightly closed.

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

Keep Out of Reach of Children

**FOR TOPICAL USE ONLY
NOT FOR ORAL, OPHTHALMIC
or INTRAVAGINAL USE**

SHAKE WELL BEFORE USE

**FOR TOPICAL USE ONLY
NOT FOR ORAL, OPHTHALMIC
or INTRAVAGINAL USE**

NDC 65162-704-86

FLUOCINOLONE ACETONIDE 0.01% Topical Oil

BODY OIL

DOSAGE AND ADMINISTRATION:

Atopic dermatitis in pediatric patients 3 mos. and older: Moisten skin. Apply Fluocinolone Acetonide 0.01% Topical Oil as a thin film to the affected areas twice daily for up to 4 weeks.

Atopic eczema/dermatitis in adults: Moisten skin. Apply Fluocinolone Acetonide 0.01% Topical Oil as a thin film to the affected areas three times daily.

DO NOT USE WITH OCCLUSION.

SEE PACKAGE INSERT FOR FULL PRESCRIBING INFORMATION.

**FOR TOPICAL USE ONLY
NOT FOR ORAL, OPHTHALMIC
or INTRAVAGINAL USE**

SHAKE WELL BEFORE USE



0
65162-704-86
N 3

Rx only

Net Contents 118.28 mL
(4 fl. oz.)

Rev. 05-2010

Manufactured by: Amneal Pharmaceuticals
Branchburg, NJ 08876

Distributed by: Amneal Pharmaceuticals
Glasgow, KY 42141

Rx only

Net Contents 118.28 mL
(4 fl. oz.)

Rev. 05-2010



LOT:

EXP:

(b) (4)

NDC 65162-704-86

**FLUOCINOLONE
ACETONIDE
0.01% Topical Oil**

BODY OIL

DO NOT USE WITH OCCLUSION.

SEE PACKAGE INSERT FOR FULL PRESCRIBING INFORMATION.

Contains: fluocinolone acetonide (0.01%), isopropyl alcohol (1.6%), in a base containing isopropyl myristate, light mineral oil, oleth-2 and refined peanut oil NF.

Storage: Keep tightly closed. Store upright at 25°C (77°F); excursions permitted to 15° to 30°C (59° to 86°F) [see USP Controlled Room Temperature].

Rx only

Manufactured by: Amneal Pharmaceuticals
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Distributed by: Amneal Pharmaceuticals
Glasgow, KY 42141



NDC 65162-704-86

**FLUOCINOLONE
ACETONIDE
0.01% Topical Oil**

BODY OIL

**FOR TOPICAL USE ONLY
NOT FOR ORAL, OPHTHALMIC
or INTRAVAGINAL USE**

SHAKE WELL BEFORE USE

Keep Out of Reach of Children

DOSAGE AND ADMINISTRATION:

Atopic dermatitis in pediatric patients 3 mos. and older: Moisten skin. Apply Fluocinolone Acetonide 0.01% Topical Oil as a thin film to the affected areas twice daily for up to 4 weeks.

Atopic eczema/dermatitis in adults: Moisten skin. Apply Fluocinolone Acetonide 0.01% Topical Oil as a thin film to the affected areas three times daily.

Rx only

Net Contents 118.28 mL
(4 fl. oz.)

LOT
EXP

Rev. 05-2010



Label size: 4" x 4"



(b) (4)

**Flucinolone Acetonide 0.01% Topical Oil
(BODY OIL)**

HIGHLIGHTS OF THE PRESCRIBING INFORMATION

These highlights do not include all the information needed to use Flucinolone Acetonide 0.01% Topical Oil safely and effectively. See full prescribing information for Flucinolone Acetonide 0.01% Topical Oil.

Flucinolone Acetonide 0.01% Topical Oil, (Body Oil)

For topical use only
Initial U.S. Approval: 1988

RECENT MAJOR CHANGES

Indication and Usage, Pediatric Patients with Atopic Dermatitis (1.2) 11/2007

INDICATION AND USAGE

Flucinolone Acetonide 0.01% Topical Oil is a corticosteroid indicated for the
 • topical treatment of atopic dermatitis in adult patients (1.1)
 • topical treatment of moderate to severe atopic dermatitis in pediatric patients 3 months and older for up to 4 weeks (1.2)

Limitations of Use:

- Apply the least amount to cover affected areas. Discontinue when disease is controlled. (1.3)
- Do not use in the diaper area. (1.3)
- Do not use on the face, axillae, or groin. (1.3, 6.2, 8.4)

DOSAGE AND ADMINISTRATION

Flucinolone acetonide 0.01% topical oil is not for oral, ophthalmic, or intravaginal use. (2)

- Adult patients: Apply to affected areas 3 times daily. (2.1)
- Pediatric patients: Moisten skin and apply to affected areas twice daily for up to 4 weeks. (2.2)

FULL PRESCRIBING INFORMATION: CONTENTS*

- INDICATION AND USAGE**
 - Adult Patients with Atopic Dermatitis
 - Pediatric Patients with Atopic Dermatitis
 - Limitations of Use
- DOSAGE AND ADMINISTRATION**
 - Adult Patients with Atopic Dermatitis
 - Pediatric Patients with Atopic Dermatitis
- DOSAGE FORM AND STRENGTHS**
- CONTRAINDICATIONS**
- WARNINGS AND PRECAUTIONS**
 - Hypothalamic-Pituitary-Adrenal Axis Suppression
 - Local Adverse Reactions with Topical Corticosteroids
 - Allergic Contact Dermatitis with Topical Corticosteroids
 - Concomitant Skin Infections
 - Use in Peanut-Sensitive Individuals
- ADVERSE REACTIONS**
 - Clinical Studies Experience: Evaluation of Facial Use in Pediatric Subjects

DOSAGE FORM AND STRENGTHS

Flucinolone Acetonide 0.01% Topical Oil (Body Oil) is supplied in bottles containing 4 fluid ounces. (3)

CONTRAINDICATIONS

None (4).

WARNINGS AND PRECAUTIONS

- Topical corticosteroids can produce reversible HPA axis suppression, Cushing's syndrome, hyperglycemia, and glucosuria. (5.1)
- Systemic absorption may require evaluation for hypothalamic-pituitary-adrenal (HPA) axis suppression. (5.1)
- Modify use should HPA axis suppression develop. (5.1)
- Potent corticosteroids, use on large areas, prolonged use or occlusive use may increase systemic absorption. (5.1)
- Local adverse reactions may include atrophy, striae irritation, acneiform eruptions, hypopigmentation, and allergic contact dermatitis and may be more likely with occlusive use or more potent corticosteroids (5.2, 5.3, 6.1)
- Children may be more susceptible to systemic toxicity from equivalent doses. (5.1, 8.4)

ADVERSE REACTIONS

The most common adverse reactions ($\geq 5\%$) were cough (20%), rhinorrhea (13%), pyrexia (10%), telangiectasia (7%), nasopharyngitis (7%), and hypopigmentation (7%).

To report SUSPECTED ADVERSE REACTIONS, contact Amneal Pharmaceuticals at 1-877-835-5472 or FDA at 1-800-FDA-1088 or www.fda.gov/medwatch.

See 17 for PATIENT COUNSELING INFORMATION

6.2. Clinical Studies Experience: Evaluation in Pediatric Subjects 3 months to 2 years old

8. USE IN SPECIFIC POPULATIONS

- Pregnancy
- Nursing Mothers
- Pediatric Use

10. OVERDOSAGE**11. DESCRIPTION****12. CLINICAL PHARMACOLOGY**

- Mechanism of Action
- Pharmacokinetics

13. NONCLINICAL TOXICOLOGY

- Carcinogenesis, mutagenesis, impairment of fertility

16. HOW SUPPLIED / STORAGE AND HANDLING**17. PATIENT COUNSELING INFORMATION**

- Instructions

* Sections or subsections omitted from the Full Prescribing Information are not listed.

FULL PRESCRIBING INFORMATION

- INDICATIONS AND USAGE**
 - Adult Patients with Atopic Dermatitis**
Flucinolone Acetonide 0.01% Topical Oil is indicated for the topical treatment of atopic dermatitis in adult patients.
 - Pediatric Patients with Atopic Dermatitis**
Flucinolone Acetonide 0.01% Topical Oil is indicated for the topical treatment of moderate to severe atopic dermatitis in pediatric patients, 3 months and older for up to 4 weeks. Safety and effectiveness in pediatric patients younger than 3 months of age have not been established.
 - Limitations of Use**
Apply the least amount of Flucinolone Acetonide 0.01% Topical Oil needed to cover the affected areas. As with other corticosteroids, Flucinolone Acetonide 0.01% Topical Oil should be discontinued when control of disease is achieved. Contact the physician if no improvement is seen within 2 weeks.
Flucinolone Acetonide 0.01% Topical Oil should not be applied to the diaper area; diapers or plastic pants may constitute occlusive use.
Flucinolone Acetonide 0.01% Topical Oil should not be used on the face, axillae, or groin unless directed by the physician. Application to intertriginous areas should be avoided due to the increased risk of local adverse reactions. [See Adverse Reactions (6) and Use in Specific Populations (8.4)].
- DOSAGE AND ADMINISTRATION**
Flucinolone acetonide 0.01% topical oil is not for oral, ophthalmic, or intravaginal use.
The dosing of flucinolone acetonide 0.01% topical oil is different for adult and pediatric patients.
 - Adult Patients with Atopic Dermatitis**
Apply flucinolone acetonide 0.01% topical oil as a thin film to the affected areas **three times daily**.
 - Pediatric Patients with Atopic Dermatitis**
Moisten skin and apply flucinolone acetonide 0.01% topical oil as a thin film to the affected areas **twice daily for up to four weeks**.
- DOSAGE FORMS AND STRENGTHS**
Flucinolone Acetonide 0.01% Topical Oil (Body Oil) is supplied in 4 fluid ounce bottles with a net content of 118.28 mL.
- CONTRAINDICATIONS**
None
- WARNINGS AND PRECAUTIONS**
 - Hypothalamic-Pituitary-Adrenal Axis Suppression**
Systemic absorption of topical corticosteroids can produce reversible hypothalamic-pituitary-adrenal (HPA) axis suppression with the potential for glucocorticosteroid insufficiency. Cushing's syndrome, hyperglycemia, and glucosuria can also be produced by systemic absorption of topical corticosteroids.
Because of the potential for systemic absorption, use of topical corticosteroids may require that patients be periodically evaluated for HPA axis suppression. The ACTH stimulation test may be helpful in evaluating patients for HPA axis suppression.
If HPA axis suppression is documented, an attempt should be made to withdraw the drug, to reduce the frequency of application, or to substitute a less potent corticosteroid. Recovery of HPA axis function is generally prompt upon discontinuation of topical corticosteroids.
Conditions which increase systemic absorption include the use of more potent corticosteroids, use over large surface areas, use over prolonged periods, and use of occlusive dressings. Manifestations of adrenal insufficiency may require supplemental systemic corticosteroids.
Children may be more susceptible to systemic toxicity from equivalent doses due to their larger skin surface to body mass ratios. [See Use in Specific Populations (8.4)]

5.2. Local Adverse Reactions with Topical Corticosteroids

Local adverse reactions may occur with use of topical corticosteroids and may be more likely to occur with occlusive use, prolonged use or use of higher potency corticosteroids. Some local adverse reactions may be irreversible. Reactions may include atrophy, striae, telangiectasias, burning, itching, irritation, dryness, folliculitis, acneiform eruptions, hypopigmentation, perioral dermatitis, allergic contact dermatitis, secondary infection, and miliaria. [See Adverse Reactions (6.1)]

5.3. Allergic Contact Dermatitis with Topical Corticosteroids

Allergic contact dermatitis to any component of topical corticosteroids is usually diagnosed by a *failure* to heal rather than a clinical exacerbation. Clinical diagnosis of allergic contact dermatitis can be confirmed by patch testing.

5.4. Concomitant Skin Infections

Concomitant skin infections should be treated with an appropriate antimicrobial agent. If the infection persists unchanged, flucinolone acetonide topical oil 0.01% should be discontinued until the infection has been adequately treated.

5.5. Use in Peanut-Sensitive Individuals

Physicians should use caution in prescribing flucinolone acetonide 0.01% topical oil for peanut-sensitive individuals. [See Description (11)]

Should signs of hypersensitivity present (wheal and flare reactions, pruritus, or other manifestations), or should disease exacerbations occur, flucinolone acetonide 0.01% topical oil should be discontinued immediately and appropriate therapy instituted.

6. ADVERSE REACTIONS

Because clinical trials are conducted under widely varying conditions, adverse reaction rates observed in the clinical trials of a drug cannot be directly compared to rates in the clinical trials of another drug and may not reflect the rates observed in practice.

6.1. Clinical Studies Experience: Evaluation of Facial Use in Pediatric Subjects

An, open-label, study was conducted in 58 children with moderate to severe atopic dermatitis (2 to 12 years old) to evaluate the safety of flucinolone acetonide 0.01% topical oil when applied to the face twice daily for 4 weeks. The following adverse reactions were reported:

**Incidence of Adverse Reaction (%)
N=58**

Adverse Reaction (AR)*	# of subjects (%)	Day 14	Day 28**	Day 56***
Any AE	15 (26)	6 (10)	7 (12)	7 (12)
Telangiectasia	5 (9)	3 (5)	4 (7)	2 (4)
Erythema	3 (5)			3 (5)
Itching	3 (5)			3 (5)
Irritation	3 (5)			3 (5)
Burning	3 (5)			3 (5)
Hypopigmentation	2 (4)	2 (4)		
Shiny Skin	1 (2)		1 (2)	
Secondary atopic dermatitis	1 (2)			1 (2)
Papules and pustules	1 (2)			1 (2)
Keratosis pilaris	1 (2)			1 (2)
Folliculitis	1 (2)		1 (2)	
Facial herpes simplex	1 (2)	1 (2)		
Acneiform eruption	1 (2)		1 (2)	
Ear infection	1 (2)		1 (2)	

*The number of individual adverse reactions reported does not necessarily reflect the number of individual subjects, since one subject could have multiple reporting of an adverse reaction.

**End of Treatment

***Four Weeks Post Treatment



**Flucinolone
Acetonide 0.01%
Topical Oil
(BODY OIL)**

Rev. 05-2011

6.2. Clinical Studies Experience: Evaluation in Pediatric Subjects 3 months to 2 years old

An open-label safety study was conducted in 29 children to assess the HPA axis by ACTH stimulation testing following use of fluocinolone acetonide 0.01% topical oil twice daily for 4 weeks. The following adverse reactions were reported in the study [See Use in Specific Populations (8.4)]:

Adverse Reactions (%)
N=30*

Adverse Reactions	# of subjects (%)
Diarrhea	1 (3)
Vomiting	1 (3)
Pyrexia	3 (10)
Abscess	1 (3)
Molluscum	1 (3)
Nasopharyngitis	2 (7)
URI	1 (3)
Otitis media	1 (3)
Cough	6 (20)
Rhinorrhea	4 (13)
Atopic dermatitis	1 (3)
Eczema	1 (3)
Hyperpigmentation	1 (3)
Hypopigmentation	2 (7)
Rash	1 (3)

*Includes one subject who withdrew at Week 2

8. USE IN SPECIFIC POPULATIONS

8.1. Pregnancy

Pregnancy Category C: Corticosteroids have been shown to be teratogenic in laboratory animals when administered systemically at relatively low dosage levels. Some corticosteroids have been shown to be teratogenic after dermal application in laboratory animals.

There are no adequate and well-controlled studies in pregnant women on teratogenic effects from fluocinolone acetonide 0.01% topical oil. Therefore, fluocinolone acetonide 0.01% topical oil should be used during pregnancy only if the potential benefit justifies the potential risk to the fetus.

8.3. Nursing Mothers

Systemically administered corticosteroids appear in human milk and could suppress growth, interfere with endogenous corticosteroid production, or cause other untoward effects. It is not known whether topical administration of corticosteroids could result in sufficient systemic absorption to produce detectable quantities in human milk. Because many drugs are excreted in human milk, caution should be exercised when fluocinolone acetonide 0.01% topical oil is administered to a nursing woman.

8.4. Pediatric Use

8.4.1. Systemic Adverse Reactions in Pediatric Patients

HPA axis suppression, Cushing's syndrome, and intracranial hypertension have been reported in children receiving topical corticosteroids. Manifestations of adrenal suppression in children include linear growth retardation, delayed weight gain, low plasma cortisol levels, and subnormal response to ACTH stimulation. Manifestations of intracranial hypertension include bulging fontanelles, headaches, and bilateral papilledema.

Because of a higher ratio of skin surface area to body mass, children are at a greater risk for systemic adverse reactions than are adults when treated with topical corticosteroids. [See Warnings and Precautions (5.1)]

8.4.2. Evaluation in Peanut-Sensitive Pediatric Subjects

A clinical study was conducted to assess the safety of fluocinolone acetonide 0.01% topical oil, which contains refined peanut oil, on subjects with known peanut allergies. The study enrolled 13 subjects with atopic dermatitis, 6 to 17 years of age. Of the 13 subjects, 9 were Radioallergen Sorbent Test (RAST) positive to peanuts and 4 had no peanut sensitivity (controls). The study evaluated the subjects' responses to both prick test and patch test utilizing peanut oil NF, fluocinolone acetonide 0.01% topical oil and histamine/saline controls. Subjects were also treated with fluocinolone acetonide topical oil 0.01% twice daily for 7 days. Prick test and patch test results for all 13 patients were negative to fluocinolone acetonide 0.01% topical oil and the refined peanut oil. One of the 9 peanut-sensitive patients experienced an exacerbation of atopic dermatitis after 5 days of fluocinolone acetonide 0.01% topical oil. The bulk peanut oil NF, used in fluocinolone acetonide 0.01% topical oil is heated at 475°F for at least 15 minutes, which should provide for adequate decomposition of allergenic proteins. [See Description (11)]

8.4.3. Evaluation in Pediatric Subjects 2 to 6 years old

Open-label safety studies were conducted on 33 children (20 subjects ages 2 to 6 years, 13 subjects ages 7 to 12 years) with moderate to severe stable atopic dermatitis. Subjects were treated with fluocinolone acetonide 0.01% topical oil twice daily for 4 weeks. Baseline body surface area involvement was 50% to 75% in 15 subjects and greater than 75% in 18 subjects. Morning pre-stimulation cortisol and post-ACTH stimulation cortisol levels were obtained in each subject at the beginning of the trial and at the end of 4 weeks of treatment. At the end of treatment, 4 out of 18 subjects aged 2 to 5 years showed low pre-stimulation cortisol levels (3.2 to 6.6 µg/dL; normal: cortisol > 7 µg/dL) but all had normal responses to 0.25 mg of ACTH stimulation (cortisol > 18 µg/dL).

8.4.4. Evaluation in Pediatric Subjects 3 months to 2 years old

An open-label safety study was conducted in 29 children (7 subjects ages 3 to 6 months, 7 subjects ages > 6 to 12 months and 15 subjects ages > 12 months to 2 years of age) to assess the HPA axis by ACTH stimulation testing following use of fluocinolone acetonide 0.01% topical oil twice daily for 4 weeks. All subjects had moderate to severe atopic dermatitis with disease involvement on at least 20% body surface area. Baseline body surface area involvement was 50% to 75% in 11 subjects and greater than 75% in 7 subjects. Morning pre-stimulation and post-ACTH stimulation cortisol levels were obtained in each subject at the beginning of the trial and at the end of 4 weeks of treatment. All subjects had normal responses to 0.125 mg of ACTH stimulation (cortisol > 18 µg/dL).

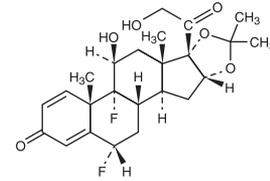
10. OVERDOSAGE

Topically applied corticosteroids can be absorbed in sufficient amounts to produce systemic effects, including under conditions of normal use. [See Warnings and Precautions (5.1) and Use in Specific Populations (8.4)].

11. DESCRIPTION

Fluocinolone Acetonide 0.01% Topical Oil (Body Oil) contains fluocinolone acetonide [(6 α , 11 β , 16 α)-6,9-difluoro-11,21-dihydroxy-16,17(1-methylethylidene) bis(oxy)-pregna-1,4-diene-3,20-dione, cyclic 16,17 acetal with acetone], a synthetic corticosteroid for topical dermatologic use. This formulation is also marketed as Fluocinolone Acetonide 0.01% Topical Oil (Scalp Oil) for use with shower caps for treatment of scalp psoriasis in adults and as fluocinolone acetonide oil, 0.01% for

treatment of chronic eczematous external otitis. Chemically, fluocinolone acetonide is C₂₄H₃₀F₂O₆. It has the following structural formula:



Fluocinolone acetonide in Fluocinolone Acetonide 0.01% Topical Oil has a molecular weight of 452.50. It is a white crystalline powder that is odorless, stable in light, and melts at 270°C with decomposition; soluble in alcohol, acetone and methanol; slightly soluble in chloroform; insoluble in water.

Each gram of Fluocinolone Acetonide 0.01% Topical Oil contains approximately 0.11 mg of fluocinolone acetonide in a blend of oils, which contains isopropyl alcohol, isopropyl myristate, light mineral oil, oleth-2, and refined peanut oil NF.

Fluocinolone Acetonide 0.01% Topical Oil is formulated with 48% refined peanut oil NF. Physicians should use caution in prescribing Fluocinolone Acetonide 0.01% Topical Oil for peanut-sensitive individuals.

12. CLINICAL PHARMACOLOGY

12.1. Mechanism of Action

Like other topical corticosteroids, fluocinolone acetonide has anti-inflammatory, antipruritic, and vasoconstrictive properties. The mechanism of the anti-inflammatory activity of the topical steroids, in general, is unclear. However, corticosteroids are thought to act by the induction of phospholipase A2 inhibitory proteins, collectively called lipocortins. It is postulated that these proteins control the biosynthesis of potent mediators of inflammation such as prostaglandins and leukotrienes by inhibiting the release of their common precursor arachidonic acid. Arachidonic acid is released from membrane phospholipids by phospholipase A2.

12.3. Pharmacokinetics

Topical corticosteroids can be absorbed from intact healthy skin. The extent of percutaneous absorption of topical corticosteroids is determined by many factors, including the product formulation and the integrity of the epidermal barrier. Occlusion, inflammation and/or other disease processes in the skin may increase percutaneous absorption. The use of pharmacodynamic endpoints for assessing the systemic exposure of topical corticosteroids may be necessary due to the fact that circulating levels are often below the level of detection. Once absorbed through the skin, topical corticosteroids are metabolized, primarily in the liver, and are then excreted by the kidneys. Some corticosteroids and their metabolites are also excreted in the bile.

Fluocinolone acetonide 0.01% topical oil is in the low to medium range of potency as compared with other topical corticosteroids in vasoconstrictor studies.

13. NONCLINICAL TOXICOLOGY

13.1. Carcinogenesis, mutagenesis, impairment of fertility:

Long-term animal studies have not been performed to evaluate the carcinogenic potential or the effect on fertility of fluocinolone acetonide 0.01% topical oil. Studies have not been performed to evaluate the mutagenic potential of fluocinolone acetonide, the active ingredient in fluocinolone acetonide 0.01% topical oil. Some corticosteroids have been found to be genotoxic in various genotoxicity tests (i.e. the *in vitro* human peripheral blood lymphocyte chromosome aberration assay with metabolic activation, the *in vivo* mouse bone marrow micronucleus assay, the Chinese hamster micronucleus test and the *in vitro* mouse lymphoma gene mutation assay).

16. HOW SUPPLIED / STORAGE AND HANDLING

Fluocinolone Acetonide 0.01% Topical Oil (Body Oil) is supplied in 4 fluid ounce bottles with a net content of 118.28 mL (NDC 65162-704-86).

Storage: Store upright at 25°C (68° to 77°F); excursions permitted to 15° to 30°C (59° to 86°F) [See USP Controlled Room Temperature].

17. PATIENT COUNSELING INFORMATION

17.1. Instructions

- Fluocinolone acetonide 0.01% topical oil should be used as directed by the physician. It is for external use only. Avoid contact with the eyes. In case of contact, wash eyes liberally with water.
- Fluocinolone acetonide 0.01% topical oil should not be used for any disorder other than that for which it was prescribed.
- Patients should report any worsening of their skin condition to their physician promptly.
- Fluocinolone acetonide 0.01% topical oil should not be applied under occlusion unless directed by the physician. Fluocinolone acetonide 0.01% topical oil should not be applied to the diaper area as diapers or plastic pants may constitute occlusive use.
- Fluocinolone acetonide 0.01% topical oil should not be used on the face, axillae, or groin unless directed by the physician.
- As with other corticosteroids, therapy should be discontinued when control of disease is achieved. Contact the physician if no improvement is seen within 2 weeks.
- Do not use other corticosteroid-containing products while using fluocinolone acetonide 0.01% topical oil without first consulting your physician.

Manufactured by:
Amneal Pharmaceuticals
Branchburg, NJ 08876

Distributed by:
Amneal Pharmaceuticals
Glasgow, KY 42141

Rev. 05-2011

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/s/

BEVERLY WEITZMAN
10/12/2011

JOHN F GRACE
10/12/2011

**REVIEW OF PROFESSIONAL LABELING #1
DIVISION OF LABELING AND PROGRAM SUPPORT
LABELING REVIEW BRANCH**

ANDA Number: 201764

Date of Submission: November 5, 2010 and May 12, 2011

Applicant's Name: Identi Pharmaceuticals, LLC.

Established Name: Fluocinolone Acetonide Oil, 0.01% (Body Oil)

Labeling Comments:

1. **CONTAINER:** Satisfactory in DRAFT.
2. **CARTON:** Satisfactory in DRAFT.
3. **INSERT:** Satisfactory in Final Print.

Submit final printed labeling electronically.

Prior to approval, it may be necessary to revise your labeling subsequent to approved changes for the reference listed drug. In order to keep ANDA labeling current, we suggest that you subscribe to the daily or weekly updates of new documents posted on the CDER web site at the following address -

http://service.govdelivery.com/service/subscribe.html?code=USFDA_17

REMS required? NO

- MedGuides and/or PPIs (505-1(e)) Yes No
 Communication plan (505-1(e)) Yes No
 Elements to assure safe use (ETASU) (505-1(f)(3)) Yes No
 Implementation system if certain ETASU (505-1(f)(4)) Yes No
 Timetable for assessment (505-1(d)) Yes No

ANDAs REMS acceptable?

- Yes No n/a

APPROVAL SUMMARY (List the package size, strength(s), and date of submission for approval):
 Do you have Final Printed Labels and Labeling?

- 1. CONTAINER (4 oz bottle)** - Satisfactory in DRAFT as of **November 5, 2010** electronic submission.
- 2. CARTON (4 oz bottle)** – Satisfactory in DRAFT as of **November 5, 2010** electronic submission.
- 3. PACKAGE INSERT** – Satisfactory in Final Print as of **May 13, 2011** electronic submission

BASIS OF APPROVAL:

- Was this approval based upon a petition? No
- What is the RLD on the 356(h) form: Derma-Smoothe/FS Topical Oil, 0.01% (Body Oil)
- NDA Number: 19-452:
- NDA Drug Name: Fluocinolone Acetonide Topical Oil, 0.01% (Body Oil)
- NDA Firm: Hill Laboratories, Inc.
- Date of Approval of NDA Insert and supplement: NDA 19- 452/S024: Approved December 12, 2007
- Has this been verified by the MIS system for the NDA? Yes
- Was this approval based upon an OGD labeling guidance? No
- Basis of Approval for the Container Labels: Side-by-side comparison
- Basis of Approval for the Carton Labeling: Side-by-side comparison
- Revisions needed post-approval: NO
- Comments: The firm has revised their insert labeling, submitted May 13, 2011, to remove the labeling statements describing the testing methodology for peanut proteins as per guidance from the agency. Please note that the Description section of the package insert mentions that the formulation is also marketed as Fluocinolone Acetonide 0.01% Topical Oil (Scalp Oil) as does the RLD. Therefore **ANDA 201764 (body oil) and ANDA 201759 (Scalp Oil) needs to be approved at the same time.**
- Patents/Exclusivities: Refer to chart below.

Patent Data – NDA 19-452

Patent No.	Patent Expiration	Use Code	Description	How Filed	Labeling Impact
			There are no unexpired patents for this product in the Orange Book Database.	II	none

Exclusivity Data– NDA 19-452

Code	Reference	Expiration	Labeling Impact
NONE	There is no unexpired exclusivity for this product in the Orange Book Database.	N/A	NONE

QUESTIONS to Chemist: Emailed question to Jim Fan: The firm states that the statement which is in the RLD labeling **“Importantly, the bulk peanut oil NF, used in fluocinolone acetonide oil is heated at 475° F for at least 15 minutes, which should provide for adequate decomposition of allergenic proteins”** **does pertain to their Fluocinolone Acetonide Oil products.**

The firm states that their bulk peanut oil is also heated at 475° F for at least 15 minutes.

Can you please confirm that the above statement is correct. (Answer on next page)

ANSWER: Hi, Beverly

We have asked the firm about the manufacturing process for the refined peanut oil in our Review#1 (see deficiency below):

Please provide a process description, including the processing temperature for the refined peanut oil, NF. Also, please provide a commitment statement to pledge that a supplemental application is required to change peanut oil suppliers.

In Review#2, the firm provide their response, which clearly describes the heating at 475° F for at least 15 minutes.

The firm's response: While conducting our search for raw material suppliers, we discovered a patent held by Hill Dermaceuticals for fluorouracil in topical cream containing peanut oil. A copy of the patent is provided in Module 3.3 Literature On page 2, item number 10, this patent lists Peanut Oil from Welch, Holme and Clark as one of interest that is suitable for use. Since Hill is the manufacturer of the RLD, we concluded that they are most likely using this (b) (4) Peanut Oil, NF is heated at 475° F for at least 15 minutes. Identi commits to file a supplemental application in the event that we need to change the Peanut Oil, NF vendor.

Reviewer's assessment: The firm provided a commitment statement to pledge that a supplement application is required to change peanut oil suppliers. The firm also included the processing temperature for refine peanut oil (475° F=246.1° C), which is in the temperature range specified in USP (230° C to 260° C). Based on the firm's investigation, it is quite possible, but not certain that Hill, the manufacturer of the RLD uses peanut oil from Welch, Holme and Clark. The firm's response is acceptable.

Therefore, the refined peanut oil used by Identi Pharma is indeed heated at 475° F for at least 15 minutes, according to their amendment.

Richard Chang

FOR THE RECORD:

1. MODEL LABELING

Labeling review based on the labeling of the reference listed drug, Derma-Smoothe/FS Topical Oil, 0.01% (Body Oil) manufactured by Hill Laboratories, Inc., (NDA19-452/S-024: Approved December 12, 2007.

LABELING ISSUES – Memo filed in Darrts: This Memo was regarding the basis for the ANDA labeling carve-out of information relating to peanut protein in the labeling for fluocinolone products that reference Hill Dermaceutical's Dema-Smoothe (NDA 19-452). (b) (4)

The office of Generic Drugs recommended the statements regarding the amount of residual peanut protein and test method be removed from the insert labeling.

FDA has determined that there is no validated assay for residual peanut protein. FDA has further determined that any peanut oil that is fully refined in accordance with the USP NF process is sufficiently safe for use in topical fluocinolone products and cannot be reliably determined to be safer for peanut allergic individuals than any other peanut oil refined in accordance with the USP NF process. As a result, when manufacturers use peanut oil that is fully refined in accordance with the USP NF process, FDA has determined that the addition of a test to quantitate protein in refined peanut oil would not improve the safety of products formulated with this excipient and will not be required. (CP response at 30.) Accordingly, FDA has determined that no product, NDA or ANDA, should reference in its labeling an unvalidated assay for peanut protein (such as the S-ELISA test or the amino acid test) that implies an additional safety benefit that has not been shown to exist.

In this case, the Hill fluocinolone labeling includes information about assays for peanut protein that have not been validated and FDA has asked Hill to remove references to these assays from the Derma-Smoothe labeling. Although Hill has not yet complied with FDA's request, FDA stands by its conclusion that, based on the information before it, the references to unvalidated assays in the Derma-Smoothe labeling are misleading and should be removed. Given FDA's conclusions about peanut oil in general and the unvalidated nature of the S-ELISA and amino acid assays as described in the Hill CP response and

(b) (4), FDA believes that ANDA applicants referencing Derma-Smooth should not be required to include this unnecessary and misleading information in their labeling.

Accordingly, FDA concludes that ANDA applicants can remove references to assays for residual peanut protein from their labeling to comply with the labeling guidelines that FDA has provided to Hill. The resulting difference between ANDA and RLD labeling is a permitted difference due to difference in manufacturer within the meaning of the statute and regulations.

Labeling outcome: It has been recommended that the generic firms do not include in their labeling the statements describing the testing methodology for peanut proteins.

Remove:

Body Oil: The peanut oil used in Derma-Smooth/FS is tested for peanut proteins through amino acid analysis which can detect the quantity of amino acids to below 0.5 parts per million

and

Scalp Oil or Ear Drops: "Peanut oil used in this product is routinely tested for peanut proteins using a sandwich enzyme-linked immunosorbent assay test(S-ELISA) kit, which can detect peanut proteins to as low as 2.5 parts per million (ppm)"

2. PATENTS/EXCLUSIVITIES

Patent Data – NDA 19-452

Patent No.	Patent Expiration	Use Code	Description	How Filed	Labeling Impact
			There are no unexpired patents for this product in the Orange Book Database.	II	none

Exclusivity Data– NDA 19-452

Code	Reference	Expiration	Labeling Impact
NONE	There is no unexpired exclusivity for this product in the Orange Book Database.	N/A	NONE

3. PACKAGING CONFIGURATION

- **RLD:** Bottles containing 4 fluid ounces.
- **ANDA:** Bottles containing 4 fluid ounces.

4. CONTAINER/CLOSURE - Fluocinolone acetonide oil will be marketed in the following package; 120 mL (4 oz) round (b) (4) bottle with a (b) (4) screw cap and a wrap around label. The product is placed in the carton with a white (b) (4) dispensing cap.

5. INACTIVE INGREDIENTS - There does not appear to be a discrepancy in inactives between the DESCRIPTION and the composition statement. The proposed formulation falls within the FDA guidelines for all components and contains the same components as the RLD.

6. STORAGE TEMPERATURE RECOMMENDATION COMPARISON

RLD – Store at 25°C (68°-77°F); excursions permitted to 15-30°C (59-86°F). [see USP Controlled Room Temperature] Keep tightly closed.

ANDA – Store at 25°C (77°F); excursions permitted to 15-30°C (59-86°F). [see USP Controlled Room Temperature] Keep tightly closed.

7. FINISHED DOSAGE FORM

- RLD – liquid
- ANDA - A colorless to light straw colored liquid.

8. MANUFACTURING FACILITY OF FINISHED DOSAGE FORM

Amneal Pharmaceuticals
Branchburgh, NJ 08876

Date of Submission: November 5, 2010 and May 12, 2011

Primary Reviewer: Beverly Weitzman **Date:**

Team Leader: John Grace **Date:**

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/s/

BEVERLY WEITZMAN
10/07/2011

JOHN F GRACE
10/11/2011

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

ANDA 201764

MEDICAL REVIEWS

**CLINICAL REVIEW TEAM CHECKLIST FOR GENERIC ANDA
FOR APPLICATION COMPLETENESS**

ANDA# 201764___ **FIRM NAME**___Identi Pharmaceuticals, LLC_____

DRUG NAME __Fluocinolone Acetonide Topical Oil, 0.01%_____

DOSAGE FORM __topical oil (Body Oil)_____

REFERENCE LISTED DRUG (RLD) _Derma-Smoothe/FS® (flucinolone acetonide) Topical oil, 0.01%, NDA 019452_____

Requested by: _Washington, Edward_____ Date: _11/10/10_____

Regulatory Support Team, (HFD-615)

Summary of Findings by Clinical Review Team	
	Study meets statutory requirements
	Study does NOT meet statutory requirements
	Reason:
X	Waiver meets statutory requirements See Comments to be conveyed to the sponsor for details.
	Waiver does NOT meet statutory requirements

RECOMMENDATION: X COMPLETE INCOMPLETE

Reviewed by:

_____ Date: _____

Reviewer
Carol Y. Kim, Pharm.D.
Clinical Reviewer

_____ Date: _____

Dena R. Hixon, M.D.
Associate Director for Medical Affairs

Item Verified:	YES	NO	Required Amount	Amount Sent	Comments
Composition	X				See comments below.
Waiver requests for other strengths / supporting data		X			See comments below.

Comments NOT to be conveyed to the sponsor:

Although Derma-Smooth Body Oil and Derma-Smooth Scalp oil are approved in a single NDA 019452, the FDA considers that they are two separate products with unique labeling. Derma-Smooth Body oil is indicated for atopic dermatitis. Derma-Smooth Scalp oil is indicated for scalp psoriasis and is packaged with a shower cap. Each drug product is identified with its own NDC number and each serves as a unique RLD.¹

The sponsor requests a waiver of the bioequivalence study requirement for their body oil product based on the conditions of 21 CFR 320.22 (b) (3) as follows:

1. Identi's product is a non-aqueous solution for application to the skin.
2. It contains the same active and inactive ingredients in the same concentration as the reference listed drug product with the exception of the trace amounts of perfumes in the RLD.

A waiver of a bioequivalence study was granted (Clinical Review dated 8/31/10) for this same sponsor's ANDA 091306 Fluocinolone Acetonide 0.01% Oil Ear Drop which contains identical active and inactive ingredients as their proposed fluocinolone acetonide 0.01% body oil. The Division of Dermatology and Dental Products determined that omission of the two fragrance components in the ANDA 091306 (ear drop) would not affect the safety or efficacy of the product.

The following tables show the formulation of the proposed product, which is the same as the formulation for the approved ear drops.

Table 1: Unit Composition				
Ingredient	w/v	w/w%	IIG limits per topical product	Purpose in formulation
Fluocinolone Acetonide, USP	0.01 g	0.011	NA	Active ingredient
Isopropyl Alcohol, USP	(b) (4)			
Peanut Oil, NF				
Oleth-2				
Isopropyl Myristate, NF				
Mineral Oil, USP				
Mineral Oil, USP				
Total	100.00 mL	(b) (4)	NA	NA

Table 3: Formulation				
Ingredient	Percent (v/v)	Mg / mL (w/v)	(b) (4) kg batch (kg)	(b) (4) kg batch (kg)
Fluocinolone Acetonide, USP	0.01	0.010	(b) (4)	
Isopropyl Alcohol, USP	(b) (4)			
Refined Peanut Oil, NF				
Oleth-2				
Isopropyl Myristate, NF				
Mineral Oil, Light, NF				
Total			100.00	100.00

Reviewer's Comment: The sponsor states that the active ingredient manufacturer, formulation, raw material sources, specifications, testing controls and test methods for the finished products are the same for their ear drops (ANDA 091306), body oil (current submission), and scalp oil (ANDA 201759). The sponsor also states that they are (b) (4).

Comments to be conveyed to the sponsor

Your application is acceptable to be received as an ANDA.

Please correct the following in the submission:

- Module 2 section 2.7 Clinical Summary (bioequivalence):** Third paragraph stated that your product is an otic solution.
- Module 1 section 1.12.12 comparison: Generic vs. Reference Listed Drug Product:** Under conditions of use, your product was written for "chronic eczematous external otitis"

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/s/

CAROL Y KIM
12/03/2010

DENA R HIXON
12/03/2010
I concur.

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
ANDA 201764

CHEMISTRY REVIEWS

ANDA 201764

Fluocinolone Acetonide 0.01% Topical Oil (Body Oil)

Identi Pharmaceuticals Inc.

**Richard Chang
Chemistry I**

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Chemistry Review Data Sheet

1. ANDA 201764

2. REVIEW #: 4

3. REVIEW DATE: October 03, 2011

4. REVIEWER: Richard Chang

5. PREVIOUS DOCUMENTS:

Original submission

November 05, 2010

Amendment

December 29, 2010

Amendment

January 10, 2011

Gratuitous Amendment

January 13, 2011

Acceptable for filing

November 5, 2010

Amendment

May 12, 2011

Amendment

August 22, 2011

6. SUBMISSION(S) BEING REVIEWED:

Submission(s) Reviewed

Document Date

Amendment

September 29, 2011

7. NAME & ADDRESS OF APPLICANT:

Name: Identi Pharmaceuticals Inc.
Address: 2224 W. Northern Ave.
Suite# D-300
Phoenix, Arizona 85021

US Agent: SciRegs International, Inc.
6333 Summercrest Drive
Columbia, MD 21045
Contact person: Jeanne Taborsky

8. DRUG PRODUCT NAME/CODE/TYPE:

a) Proprietary Name: N/A

Non-Proprietary Name (USAN): Fluocinolone Acetonide Oil 0.01 % Topical Oil
(Body Oil)

Chemistry Review Data Sheet

9. LEGAL BASIS FOR SUBMISSION:

The Reference Listed Drug is Hill's Derma-Smoothe/FS® fluocinolone acetonide 0.01% Topical Oil (Body Oil) (NDA 019452)

PATENT CERTIFICATION STATEMENT

Identi Pharmaceuticals provided a statement of patent certification for the Abbreviated New Drug Application for Fluocinolone Acetonide 0.01% Topical Oil (Body Oil).

Also presented is a marketing exclusivity statement required under 21 CFR Section 314.94(a)(3)(ii).

PATENT INFORMATION

Identi Pharmaceuticals' proposed drug product is the generic version of Hill Dermaceuticals' Derma-Smoothe®, pursuant to NDA 019452. There are no unexpired patents for this drug product in the FDA listing titled Electronic Orange Book- Approved Drug Products with Therapeutic Equivalence Evaluations (commonly known as Orange Book). Identi Pharmaceuticals provided a Paragraph II certification for their drug product, Fluocinolone Acetonide Oil, 0.01%.

EXCLUSIVITY STATEMENT

The firm also provided an exclusivity statement to state that there is no unexpired exclusivity for this drug product.

10. PHARMACOL. CATEGORY:

Glucocorticoid and indicated for the treatment of atopic dermatitis in adult patients and moderate to severe atopic dermatitis in pediatric patients.

11. DOSAGE FORM: Topical Oil (Body Oil)

12. STRENGTH/POTENCY: 0.01%

13. ROUTE OF ADMINISTRATION: Topical

14. Rx/OTC DISPENSED: Rx OTC

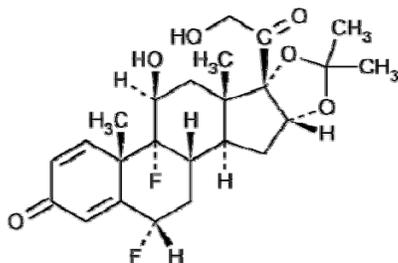
15. [SPOTS \(SPECIAL PRODUCTS ON-LINE TRACKING SYSTEM\):](#)

SPOTS product – Form Completed

Not a SPOTS product

Chemistry Review Data Sheet

16. CHEMICAL NAME, STRUCTURAL FORMULA, MOLECULAR FORMULA, MOLECULAR WEIGHT:

Compendial name: fluocinolone acetonide, USP**Chemical name:** Pregna-1,4-diene-3,20-dione, 6,9-difluoro-11,21-dihydroxy-16,17-[(1-methylethylidene)bis(oxy)]-, (6 α ,11 β ,16 α)-6 α ,9-Difluoro-11 β ,16 α ,17,21-tetrahydroxypregna-1,4-diene-3,20-dione, cyclic 16,17-acetal with acetone**Molecular formula:** C₂₄H₃₀F₂O₆ (anhydrous)**Molecular weight:** 452.50**Structure:**

17. RELATED/SUPPORTING DOCUMENTS:

A. DMFs:

DMF #	Type	Item referenced	Holder	Code ¹ / Status ²	Date review completed	Comments
(b) (4)				1/Adequate	04/1/11	Reviewed by Richard Chang
				4		
				4		
				4		
				4		

Chemistry Review Data Sheet

(b) (4)	4		
	4		
	4		

¹ Action codes for DMF Table: 1 – DMF Reviewed.
 Other codes indicate why the DMF was not reviewed, as follows:
 2 – Type 1 DMF; 3 – Reviewed previously and no revision since last review; 4 – Sufficient information in application; 5 – Authority to reference not granted; 6 – DMF not available; 7 – Other (explain under "Comments"); ² Adequate, Inadequate, or N/A (There is enough data in the application, therefore the DMF did not need to be reviewed)

Chemistry Review Data Sheet

B. Other Documents: N/A

18. STATUS:

CONSULTS/ CMC RELATED REVIEWS	RECOMMENDATION	DATE	REVIEWER
Microbiology	N/A		
EES	Acceptable	3/10/11	
Methods Validation	N/A		
Labeling	Acceptable	10/13/11	B. Weitzman
Bioequivalence	Acceptable	5/23/11	S.Pabba
EA	Satisfactory (exclusion requested)		
Radiopharmaceutical	N/A		

19. ORDER OF REVIEW

The application submission(s) covered by this review was taken in the date order of receipt.

Yes No If no, explain reason(s) below:

The Chemistry Review for ANDA 201764

The Executive Summary

I. Recommendations

A. Recommendation and Conclusion on approvability

This ANDA is approvable.

B. Recommendation on Phase 4 (Post-Marketing) Commitments, Agreements, and/or Risk Management Steps, if approvable

N/A

II. Summary of Chemistry Assessments

A. Description of the Drug Product(s) and Drug Substance(s)

Drug product

Fluocinolone Acetonide 0.01% Topical Oil contains fluocinolone acetonide which is a synthetic, fluorinated corticosteroid. It is intended for topical dermatologic use for the relief of the inflammatory and pruritic manifestation of atopic dermatitis in patients 1 year or older. Each gram of Fluocinolone Acetonide Oil, 0.01% contains 0.11^{(b) (4)} mg fluocinolone acetonide per mL in an oil consisting of isopropyl alcohol USP, refined peanut oil NF, isopropyl myristate NF, Oleth-2 and light mineral oil NF.

Fluocinolone Acetonide Oil, 0.01% is a clear, colorless to light straw colored liquid. Fluocinolone acetonide oil will be marketed in the following package; 120 mL (4 oz) round ^{(b) (4)} bottle with a ^{(b) (4)} screw cap and a wrap around label. The product is placed in the carton with a white ^{(b) (4)} dispensing cap, medication guide and insert.

It is to be stored in controlled room temperature and shipped at cool or refrigerated conditions. The proposed expiration dating for the drug product is 24 months.

Drug substance

The chemical name of fluocinolone acetonide is Pregna-1,4-diene-3,20-dione, 6,9-difluoro-11,21-dihydroxy-16,17-[(1-methylethylidene)bis(oxy)]-, (6 α ,11 β ,16 α)-6 α ,9-Difluoro-11 β ,16 α ,17,21-tetrahydropregna-1,4-diene-3,20-dione, cyclic 16,17-acetal with acetone. The drug substance is listed in the USP Monograph. It is a white to practically white crystalline powder. It is insoluble in water, freely soluble in acetone and glacial acetic acid, sparingly soluble in chloroform and methanol, and very slightly soluble in ether.

B. Description of How the Drug Product is Intended to be Used

Fluocinolone Acetonide Oil, 0.01%, should be applied to the affected area as a thin film three times daily for adult patients with atopic dermatitis and twice daily for up to four weeks for pediatric patients with atopic dermatitis.

Maximum daily dose (MDD) (the firm's calculation option 2)

According to the innovator web site, one bottle was sufficient for a full course treatment. The full course treatment is twice a day until the skin returns to normal usually within 4 weeks of therapy.

MDD= [redacted] (b) (4)
[redacted] mg fluocinolone acetonide per day.

	IT	QT
DS	[redacted]	(b) (4)
DP	[redacted]	

C. Basis for approvability or Not-approval Recommendation

The ANDA is approvable .

Review Note for the amendment dated August 22, 2011

Identi is transferring the testing of the active pharmaceutical ingredient from [redacted] (b) (4) to Amneal Pharmaceuticals. Amneal will not be transferring the [redacted] (b) (4) method for assay or impurities, but rather using the USP regulatory method to test assay, and the FDA reviewed API supplier method to test impurities. Amneal is already approved as the manufacturer, and as the testing lab for inactive ingredients and the finished product. The firm included a copy of the method verification report and the test method in the amendment. The assay method and related compounds method are verified and found to be specific and precise and rugged. The data for each validation characteristic described in the report meet the acceptance criteria indicating that the test methods are valid to determine assay and related compounds of Fluocinolone Acetonide. The ANDA (CMC) remains approvable.

Review Note for the amendment dated September 29, 2011

On September 26, 2011, the following deficiency was communicated with the firm and the firm responded on September 29, 2011:

Please remove the following tests and specifications from your drug product release and stability specifications [redacted] (b) (4)

[redacted] Please submit a revised drug product release and stability specifications.

The firm's response: As requested, Identi removed the following tests and specifications from our drug product release and stability specifications: [redacted] (b) (4)

[redacted] and submitted revised drug product release specifications in Section 3.2.P.5.1 Specifications and stability specifications in Section 3.2.P.8.1 Stability The method for related compounds and assay has also been revised to reflect the changes to the impurities reporting. The revised method 701-AS-RC is provided herein.

Reviewer's assessment: As requested, the firm revised the drug product release and stability specifications. The ANDA (CMC) remains approvable.

29 PAGES HAVE BEEN WITHHELD IN FULL AS B4 (CCI/TS) IMMEDIATELY FOLLOWING THIS PAGE

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/s/

RICHARD CHANG
10/13/2011

TRANG Q TRAN
10/13/2011

JAMES M FAN
10/13/2011

ANDA 201764

Fluocinolone Acetonide 0.01% Topical Oil (Body Oil)

Identi Pharmaceuticals Inc.

**Richard Chang
Chemistry I**

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Chemistry Review Data Sheet

1. ANDA 201764

2. REVIEW #: 3

3. REVIEW DATE: September 08, 2011

4. REVIEWER: Richard Chang

5. PREVIOUS DOCUMENTS:

Original submission

November 05, 2010

Amendment

December 29, 2010

Amendment

January 10, 2011

Gratuitous Amendment

January 13, 2011

Acceptable for filing

November 5, 2010

Amendment

May 12, 2011

6. SUBMISSION(S) BEING REVIEWED:

Submission(s) Reviewed

Document Date

Amendment

August 22, 2011

7. NAME & ADDRESS OF APPLICANT:

Name: Identi Pharmaceuticals Inc.
Address: 2224 W. Northern Ave.
Suite# D-300
Phoenix, Arizona 85021

US Agent: SciRegs International, Inc.
6333 Summercrest Drive
Columbia, MD 21045
Contact person: Jeanne Taborsky

8. DRUG PRODUCT NAME/CODE/TYPE:

a) Proprietary Name: N/A

Non-Proprietary Name (USAN): Fluocinolone Acetonide Oil 0.01 % Topical Oil
(Body Oil)

9. LEGAL BASIS FOR SUBMISSION:

Chemistry Review Data Sheet

The Reference Listed Drug is Hill's Derma-Smoothe/FS® fluocinolone acetonide 0.01% Topical Oil (Body Oil) (NDA 019452)

PATENT CERTIFICATION STATEMENT

Identi Pharmaceuticals provided a statement of patent certification for the Abbreviated New Drug Application for Fluocinolone Acetonide 0.01% Topical Oil (Body Oil).

Also presented is a marketing exclusivity statement required under 21 CFR Section 314.94(a)(3)(ii).

PATENT INFORMATION

Identi Pharmaceuticals' proposed drug product is the generic version of Hill Dermaceuticals' Derma-Smoothe®, pursuant to NDA 019452. There are no unexpired patents for this drug product in the FDA listing titled Electronic Orange Book- Approved Drug Products with Therapeutic Equivalence Evaluations (commonly known as Orange Book). Identi Pharmaceuticals provided a Paragraph II certification for their drug product, Fluocinolone Acetonide Oil, 0.01%.

EXCLUSIVITY STATEMENT

The firm also provided an exclusivity statement to state that there is no unexpired exclusivity for this drug product.

10. PHARMACOL. CATEGORY:

Glucocorticoid and indicated for the treatment of atopic dermatitis in adult patients and moderate to severe atopic dermatitis in pediatric patients.

11. DOSAGE FORM: Topical Oil (Body Oil)

12. STRENGTH/POTENCY: 0.01%

13. ROUTE OF ADMINISTRATION: Topical

14. Rx/OTC DISPENSED: Rx OTC

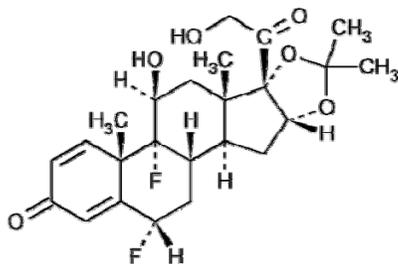
15. SPOTS (SPECIAL PRODUCTS ON-LINE TRACKING SYSTEM):

SPOTS product – Form Completed

Not a SPOTS product

Chemistry Review Data Sheet

16. CHEMICAL NAME, STRUCTURAL FORMULA, MOLECULAR FORMULA, MOLECULAR WEIGHT:

Compendial name: fluocinolone acetonide, USP**Chemical name:** Pregna-1,4-diene-3,20-dione, 6,9-difluoro-11,21-dihydroxy-16,17-[(1-methylethylidene)bis(oxy)],-(6 α ,11 β ,16 α)-6 α ,9-Difluoro-11 β ,16 α ,17,21-tetrahydroxypregna-1,4-diene-3,20-dione, cyclic 16,17-acetal with acetone**Molecular formula:** C₂₄H₃₀F₂O₆ (anhydrous)**Molecular weight:** 452.50**Structure:**

17. RELATED/SUPPORTING DOCUMENTS:

A. DMFs:

DMF #	Type	Item referenced	Holder	Code ¹ / Status ²	Date review completed	Comments
(b) (4)				1/Adequate	04/1/11	Reviewed by Richard Chang
				4		
				4		
				4		
				4		

Chemistry Review Data Sheet

(b) (4)	4		
	4		
	4		

¹ Action codes for DMF Table: 1 – DMF Reviewed.
 Other codes indicate why the DMF was not reviewed, as follows:
 2 – Type 1 DMF; 3 – Reviewed previously and no revision since last review; 4 – Sufficient information in application; 5 – Authority to reference not granted; 6 – DMF not available; 7 – Other (explain under "Comments"); ² Adequate, Inadequate, or N/A (There is enough data in the application, therefore the DMF did not need to be reviewed)

Chemistry Review Data Sheet

B. Other Documents: N/A

18. STATUS:

CONSULTS/ CMC RELATED REVIEWS	RECOMMENDATION	DATE	REVIEWER
Microbiology	N/A		
EES	Acceptable	3/10/11	
Methods Validation	N/A		
Labeling	Pending		
Bioequivalence	Acceptable	5/23/11	S.Pabba
EA	Satisfactory (exclusion requested)		
Radiopharmaceutical	N/A		

19. ORDER OF REVIEW

The application submission(s) covered by this review was taken in the date order of receipt.

Yes No If no, explain reason(s) below:

The Chemistry Review for ANDA 201764

The Executive Summary

I. Recommendations

A. Recommendation and Conclusion on approvability

This ANDA is approvable (CMC).. Labeling is pending.

B. Recommendation on Phase 4 (Post-Marketing) Commitments, Agreements, and/or Risk Management Steps, if approvable

N/A

II. Summary of Chemistry Assessments

A. Description of the Drug Product(s) and Drug Substance(s)

Drug product

Fluocinolone Acetonide 0.01% Topical Oil contains fluocinolone acetonide which is a synthetic, fluorinated corticosteroid. It is intended for topical dermatologic use for the relief of the inflammatory and pruritic manifestation of atopic dermatitis in patients 1 year or older. Each gram of Fluocinolone Acetonide Oil, 0.01% contains 0.11 ^{(b) (4)} mg fluocinolone acetonide per mL in an oil consisting of isopropyl alcohol USP, refined peanut oil NF, isopropyl myristate NF, Oleth-2 and light mineral oil NF.

Fluocinolone Acetonide Oil, 0.01% is a clear, colorless to light straw colored liquid. Fluocinolone acetonide oil will be marketed in the following package; 120 mL (4 oz) round ^{(b) (4)} bottle with a ^{(b) (4)} screw cap and a wrap around label. The product is placed in the carton with a white ^{(b) (4)} dispensing cap, medication guide and insert.

It is to be stored in controlled room temperature and shipped at cool or refrigerated conditions. The proposed expiration dating for the drug product is 24 months.

Drug substance

The chemical name of fluocinolone acetonide is Pregna-1,4-diene-3,20-dione, 6,9-difluoro-11,21-dihydroxy-16,17-[(1-methylethylidene)bis(oxy)]-, (6 α ,11 β ,16 α)-6 α ,9-Difluoro-11 β ,16 α ,17,21-tetrahydroxypregna-1,4-diene-3,20-dione, cyclic 16,17-acetal with acetone. The drug substance is listed in the USP Monograph. It is a white to practically white crystalline powder. It is insoluble in water, freely soluble in acetone and glacial acetic acid, sparingly soluble in chloroform and methanol, and very slightly soluble in ether.

B. Description of How the Drug Product is Intended to be Used

Fluocinolone Acetonide Oil, 0.01%, should be applied to the affected area as a thin film three times daily for adult patients with atopic dermatitis and twice daily for up to four weeks for pediatric patients with atopic dermatitis.

Maximum daily dose (MDD) (the firm's calculation option 2)

According to the innovator web site, one bottle was sufficient for a full course treatment. The full course treatment is twice a day until the skin returns to normal usually within 4 weeks of therapy.

MDD= [REDACTED] (b) (4)
[REDACTED] mg fluocinolone acetonide per day.

	IT	QT
DS	[REDACTED]	(b) (4)
DP	[REDACTED]	

C. Basis for approvability or Not-approval Recommendation

The ANDA is approvable (CMC). Labeling is pending.

Review Note for the amendment dated August 22, 2011

Identi is transferring the testing of the active pharmaceutical ingredient from [REDACTED] (b) (4) to Amneal Pharmaceuticals. Amneal will not be transferring the [REDACTED] (b) (4) method for assay or impurities, but rather using the USP regulatory method to test assay, and the FDA reviewed API supplier method to test impurities. Amneal is already approved as the manufacturer, and as the testing lab for inactive ingredients and the finished product. The firm included a copy of the method verification report and the test method in the amendment. The assay method and related compounds method are verified and found to be specific and precise and rugged. The data for each validation characteristic described in the report meet the acceptance criteria indicating that the test methods are valid to determine assay and related compounds of Fluocinolone Acetonide. The ANDA (CMC) remains approvable.

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

RICHARD CHANG
09/15/2011

TRANG Q TRAN
09/15/2011

JAMES M FAN
09/16/2011

ANDA 201764

Fluocinolone Acetonide 0.01% Topical Oil (Body Oil)

Identi Pharmaceuticals Inc.

**Richard Chang
Chemistry I**

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Chemistry Review Data Sheet

1. ANDA 201764
2. REVIEW #: 2
3. REVIEW DATE: May 18, 2011
4. REVIEWER: Richard Chang
5. PREVIOUS DOCUMENTS: N/A
6. SUBMISSION(S) BEING REVIEWED:

<u>Submission(s) Reviewed</u>	<u>Document Date</u>
Original submission	November 5, 2010
Amendment	December 29, 2010
Amendment	January 10, 2011
Gratuitous Amendment	January 13, 2011
Acceptable for filing	November 5, 2010
Amendment	May 12, 2011

7. NAME & ADDRESS OF APPLICANT:

Name: Identi Pharmaceuticals Inc.
Address: 2224 W. Northern Ave.
Suite# D-300
Phoenix, Arizona 85021

US Agent: SciRegs International, Inc.
6333 Summercrest Drive
Columbia, MD 21045
Contact person: Jeanne Taborsky

8. DRUG PRODUCT NAME/CODE/TYPE:

a) Proprietary Name: N/A

Non-Proprietary Name (USAN): Fluocinolone Acetonide Oil 0.01 % Topical Oil
(Body Oil)

9. LEGAL BASIS FOR SUBMISSION:

Chemistry Review Data Sheet

The Reference Listed Drug is Hill's Derma-Smoothe/FS® fluocinolone acetonide 0.01% Topical Oil (Body Oil) (NDA 019452)

PATENT CERTIFICATION STATEMENT

Identi Pharmaceuticals provided a statement of patent certification for the Abbreviated New Drug Application for Fluocinolone Acetonide 0.01% Topical Oil (Body Oil).

Also presented is a marketing exclusivity statement required under 21 CFR Section 314.94(a)(3)(ii).

PATENT INFORMATION

Identi Pharmaceuticals' proposed drug product is the generic version of Hill Dermaceuticals' Derma-Smoothe®, pursuant to NDA 019452. There are no unexpired patents for this drug product in the FDA listing titled Electronic Orange Book- Approved Drug Products with Therapeutic Equivalence Evaluations (commonly known as Orange Book). Identi Pharmaceuticals provided a Paragraph II certification for their drug product, Fluocinolone Acetonide Oil, 0.01%.

EXCLUSIVITY STATEMENT

The firm also provided an exclusivity statement to state that there is no unexpired exclusivity for this drug product.

10. PHARMACOL. CATEGORY:

Glucocorticoid and indicated for the treatment of atopic dermatitis in adult patients and moderate to severe atopic dermatitis in pediatric patients.

11. DOSAGE FORM: Topical Oil (Body Oil)

12. STRENGTH/POTENCY: 0.01%

13. ROUTE OF ADMINISTRATION: Topical

14. Rx/OTC DISPENSED: Rx OTC

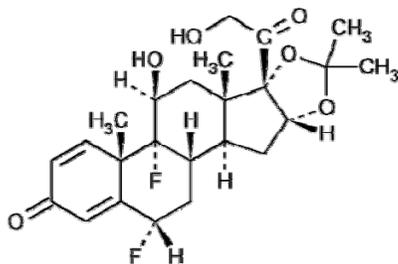
15. SPOTS (SPECIAL PRODUCTS ON-LINE TRACKING SYSTEM):

SPOTS product – Form Completed

Not a SPOTS product

Chemistry Review Data Sheet

16. CHEMICAL NAME, STRUCTURAL FORMULA, MOLECULAR FORMULA, MOLECULAR WEIGHT:

Compendial name: fluocinolone acetonide, USP**Chemical name:** Pregna-1,4-diene-3,20-dione, 6,9-difluoro-11,21-dihydroxy-16,17-[(1-methylethylidene)bis(oxy)]-, (6 α ,11 β ,16 α)-6 α ,9-Difluoro-11 β ,16 α ,17,21-tetrahydroxypregna-1,4-diene-3,20-dione, cyclic 16,17-acetal with acetone**Molecular formula:** C₂₄H₃₀F₂O₆ (anhydrous)**Molecular weight:** 452.50**Structure:**

17. RELATED/SUPPORTING DOCUMENTS:

A. DMFs:

DMF #	Type	Item referenced	Holder	Code ¹ / Status ²	Date review completed	Comments
(b) (4)				1/Adequate	04/1/11	Reviewed by Richard Chang
				4		
				4		
				4		
				4		

Chemistry Review Data Sheet

(b) (4)	4		
	4		
	4		

¹ Action codes for DMF Table: 1 – DMF Reviewed.

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2 – Type 1 DMF; 3 – Reviewed previously and no revision since last review; 4 – Sufficient information in application; 5 – Authority to reference not granted; 6 – DMF not available; 7 – Other (explain under "Comments"); ² Adequate, Inadequate, or N/A (There is enough data in the application, therefore the DMF did not need to be reviewed)

Chemistry Review Data Sheet

B. Other Documents: N/A

18. STATUS:

CONSULTS/ CMC RELATED REVIEWS	RECOMMENDATION	DATE	REVIEWER
Microbiology	N/A		
EES	Acceptable	3/10/11	
Methods Validation	N/A		
Labeling	Pending		
Bioequivalence	Acceptable	5/23/11	S.Pabba
EA	Satisfactory (exclusion requested)		
Radiopharmaceutical	N/A		

19. ORDER OF REVIEW

The application submission(s) covered by this review was taken in the date order of receipt.

Yes No If no, explain reason(s) below:

The Chemistry Review for ANDA 201764

The Executive Summary

I. Recommendations

A. Recommendation and Conclusion on approvability

This ANDA is approvable (CMC).. Labeling is pending.

B. Recommendation on Phase 4 (Post-Marketing) Commitments, Agreements, and/or Risk Management Steps, if approvable

N/A

II. Summary of Chemistry Assessments

A. Description of the Drug Product(s) and Drug Substance(s)

Drug product

Fluocinolone Acetonide 0.01% Topical Oil contains fluocinolone acetonide which is a synthetic, fluorinated corticosteroid. It is intended for topical dermatologic use for the relief of the inflammatory and pruritic manifestation of atopic dermatitis in patients 1 year or older. Each gram of Fluocinolone Acetonide Oil, 0.01% contains 0.11^{(b) (4)} mg fluocinolone acetonide per mL in an oil consisting of isopropyl alcohol USP, refined peanut oil NF, isopropyl myristate NF, Oleth-2 and light mineral oil NF.

Fluocinolone Acetonide Oil, 0.01% is a clear, colorless to light straw colored liquid. Fluocinolone acetonide oil will be marketed in the following package; 120 mL (4 oz) round ^{(b) (4)} bottle with a ^{(b) (4)} screw cap and a wrap around label. The product is placed in the carton with a white ^{(b) (4)} dispensing cap, medication guide and insert.

It is to be stored in controlled room temperature and shipped at cool or refrigerated conditions. The proposed expiration dating for the drug product is 24 months.

Drug substance

The chemical name of fluocinolone acetonide is Pregna-1,4-diene-3,20-dione, 6,9-difluoro-11,21-dihydroxy-16,17-[(1-methylethylidene)bis(oxy)]-,(6 α ,11 β ,16 α)-6 α ,9-Difluoro-11 β ,16 α ,17,21-tetrahydropregna-1,4-diene-3,20-dione, cyclic 16,17-acetal with acetone. The drug substance is listed in the USP Monograph. It is a white to practically white crystalline powder. It is insoluble in water, freely soluble in acetone and glacial acetic acid, sparingly soluble in chloroform and methanol, and very slightly soluble in ether.

B. Description of How the Drug Product is Intended to be Used

Fluocinolone Acetonide Oil, 0.01%, should be applied to the affected area as a thin film three times daily for adult patients with atopic dermatitis and twice daily for up to four weeks for pediatric patients with atopic dermatitis.

Maximum daily dose (MDD) (the firm's calculation option 2)

According to the innovator web site, one bottle was sufficient for a full course treatment. The full course treatment is twice a day until the skin returns to normal usually within 4 weeks of therapy.

MDD= [REDACTED] (b) (4)
[REDACTED] mg fluocinolone acetonide per day.

	IT	QT
DS	[REDACTED]	(b) (4)
DP	[REDACTED]	

C. Basis for approvability or Not-approval Recommendation

The ANDA is approvable (CMC). Labeling is pending.

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

RICHARD CHANG
05/26/2011

TRANG Q TRAN
05/26/2011

JAMES M FAN
05/26/2011

ANDA 201764

Fluocinolone Acetonide 0.01% Topical Oil (Body Oil)

Identi Pharmaceuticals Inc.

**Richard Chang
Chemistry I**

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Chemistry Review Data Sheet

1. ANDA 201764
2. REVIEW #: 1
3. REVIEW DATE: March 08, 2011
4. REVIEWER: Richard Chang
5. PREVIOUS DOCUMENTS: N/A
6. SUBMISSION(S) BEING REVIEWED:

<u>Submission(s) Reviewed</u>	<u>Document Date</u>
Original submission	November 5, 2010
Amendment	December 29, 2010
Amendment	January 10, 2011
Gratuitous Amendment	January 13, 2011
Acceptable for filing	November 5, 2010

7. NAME & ADDRESS OF APPLICANT:

Name: Identi Pharmaceuticals Inc.
Address: 2224 W. Northern Ave.
Suite# D-300
Phoenix, Arizona 85021

US Agent: SciRegs International, Inc.
6333 Summercrest Drive
Columbia, MD 21045
Contact person: Jeanne Taborsky

8. DRUG PRODUCT NAME/CODE/TYPE:

a) Proprietary Name: N/A

Non-Proprietary Name (USAN): Fluocinolone Acetonide Oil 0.01 % Topical Oil
(Body Oil)

9. LEGAL BASIS FOR SUBMISSION:

Chemistry Review Data Sheet

The Reference Listed Drug is Hill's Derma-Smoothe/FS® fluocinolone acetonide 0.01% Topical Oil (Body Oil) (NDA 019452)

PATENT CERTIFICATION STATEMENT

Identi Pharmaceuticals provided a statement of patent certification for the Abbreviated New Drug Application for Fluocinolone Acetonide 0.01% Topical Oil (Body Oil).

Also presented is a marketing exclusivity statement required under 21 CFR Section 314.94(a)(3)(ii).

PATENT INFORMATION

Identi Pharmaceuticals' proposed drug product is the generic version of Hill Dermaceuticals' Derma-Smoothe®, pursuant to NDA 019452. There are no unexpired patents for this drug product in the FDA listing titled Electronic Orange Book- Approved Drug Products with Therapeutic Equivalence Evaluations (commonly known as Orange Book). Identi Pharmaceuticals provided a Paragraph II certification for their drug product, Fluocinolone Acetonide Oil, 0.01%.

EXCLUSIVITY STATEMENT

The firm also provided an exclusivity statement to state that there is no unexpired exclusivity for this drug product.

10. PHARMACOL. CATEGORY:

Glucocorticoid and indicated for the treatment of atopic dermatitis in adult patients and moderate to severe atopic dermatitis in pediatric patients.

11. DOSAGE FORM: Topical Oil (Body Oil)

12. STRENGTH/POTENCY: 0.01%

13. ROUTE OF ADMINISTRATION: Topical

14. Rx/OTC DISPENSED: Rx OTC

15. SPOTS (SPECIAL PRODUCTS ON-LINE TRACKING SYSTEM):

SPOTS product – Form Completed

Not a SPOTS product

Chemistry Review Data Sheet

(b) (4)	4		
	4		
	4		

¹ Action codes for DMF Table: 1 – DMF Reviewed.
 Other codes indicate why the DMF was not reviewed, as follows:
 2 – Type 1 DMF; 3 – Reviewed previously and no revision since last review; 4 – Sufficient information in application; 5 – Authority to reference not granted; 6 – DMF not available; 7 – Other (explain under "Comments"); ² Adequate, Inadequate, or N/A (There is enough data in the application, therefore the DMF did not need to be reviewed)

Chemistry Review Data Sheet

B. Other Documents: N/A

18. STATUS:

CONSULTS/ CMC RELATED REVIEWS	RECOMMENDATION	DATE	REVIEWER
Microbiology	N/A		
EES	Pending		
Methods Validation	N/A		
Labeling	Pending		
Bioequivalence	Pending (Biowaiver requested)		
EA	Satisfactory (exclusion requested)		
Radiopharmaceutical	N/A		

19. ORDER OF REVIEW

The application submission(s) covered by this review was taken in the date order of receipt.

Yes No If no, explain reason(s) below:

The Chemistry Review for ANDA 201764

The Executive Summary

I. Recommendations

A. Recommendation and Conclusion on approvability

This ANDA is presently non-approvable. The minor chemistry deficiencies listed in the review should be addressed before the application can be approved. Labeling, Bioequivalence, and EES are pending.

B. Recommendation on Phase 4 (Post-Marketing) Commitments, Agreements, and/or Risk Management Steps, if approvable

N/A

II. Summary of Chemistry Assessments

A. Description of the Drug Product(s) and Drug Substance(s)

Drug product

Fluocinolone Acetonide 0.01% Topical Oil contains fluocinolone acetonide which is a synthetic, fluorinated corticosteroid. It is intended for topical dermatologic use for the relief of the inflammatory and pruritic manifestation of atopic dermatitis in patients 1 year or older. Each gram of Fluocinolone Acetonide Oil, 0.01% contains 0.11^{(b) (4)} mg fluocinolone acetonide per mL in an oil consisting of isopropyl alcohol USP, refined peanut oil NF, isopropyl myristate NF, Oleth-2 and light mineral oil NF.

Fluocinolone Acetonide Oil, 0.01% is a clear, colorless to light straw colored liquid. Fluocinolone acetonide oil will be marketed in the following package; 120 mL (4 oz) round ^{(b) (4)} bottle with a ^{(b) (4)} screw cap and a wrap around label. The product is placed in the carton with a white ^{(b) (4)} dispensing cap, medication guide and insert.

It is to be stored in controlled room temperature and shipped at cool or refrigerated conditions. The proposed expiration dating for the drug product is 24 months.

Drug substance

The chemical name of fluocinolone acetonide is Pregna-1,4-diene-3,20-dione, 6,9-difluoro-11,21-dihydroxy-16,17-[(1-methylethylidene)bis(oxy)]-, (6 α ,11 β ,16 α)-6 α ,9-Difluoro-11 β ,16 α ,17,21-tetrahydroxypregna-1,4-diene-3,20-dione, cyclic 16,17-acetal with acetone. The drug substance is listed in the USP Monograph. It is a white to practically white crystalline powder. It is insoluble in water, freely soluble in acetone and glacial acetic acid, sparingly soluble in chloroform and methanol, and very slightly soluble in ether.

B. Description of How the Drug Product is Intended to be Used

Fluocinolone Acetonide Oil, 0.01%, should be applied to the affected area as a thin film three times daily for adult patients with atopic dermatitis and twice daily for up to four weeks for pediatric patients with atopic dermatitis.

Maximum daily dose (MDD) (our calculation)

The MDD is calculated below based on the package insert information from Derma-Smoothe® Oil for Fluocinolone Acetonide Oil, 0.01% and ~2 mL of oil can cover the affected area to form a thin film.

MDD= [redacted] ^{(b) (4)} assuming 100% absorption

	IT	QT
DS	[redacted]	[redacted] ^{(b) (4)}
DP	[redacted]	[redacted]

C. Basis for approvability or Not-approval Recommendation

The ANDA is non-approvable due to minor deficiencies. Labeling, bioequivalence reviews, and EES are pending.

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/s/

RICHARD CHANG
04/25/2011

TRANG Q TRAN
04/26/2011

JAMES M FAN
04/26/2011

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
ANDA 201764

BIOEQUIVALENCE REVIEWS

DIVISION OF BIOEQUIVALENCE REVIEW

ANDA No.	201764
Drug Product Name	Fluocinolone Acetonide 0.01% Topical Oil (Body Oil)
Strength(s)	0.01%
Applicant Name	Identi Pharmaceuticals Inc.
Address	SciRegs International, Inc. 6333 Summercrest drive, Columbia, MD 21045
Applicant's Point of Contact	C. Jeanne Taborsky
Contact's Telephone Number	410-309-3145
Contact's Fax Number	410-309-6145
Original Submission Date(s)	November 05, 2010
Submission Date(s) of Amendment(s) Under Review	--
Reviewer	Santhosh K. Pabba, Ph.D.
OVERALL REVIEW RESULT	ADEQUATE
WAIVER REQUEST RESULT	ADEQUATE

1 EXECUTIVE SUMMARY

This is a review of a waiver request for Identi Pharmaceuticals Inc., Fluocinolone Acetonide 0.01% Topical Oil (Body Oil). The test product is qualitatively (Q1) and quantitatively (Q2) the same to the RLD product, except for the lack of fragrances which are present in the RLD product. The Q1 and Q2 differences in the formulation are within $\pm 5\%$ based on the % volume/volume (%v/v) comparison of each of the inactive ingredients. The differences in the formulation pertain to the two fragrances (Cream Fragrance (b) (4) and Balsam Pine Fragrance (b) (4)) that the RLD product contains but the test product does not contain. This difference in formulation is not expected to affect the systemic absorption of the drug product.⁶ Therefore, the waiver request is granted per 21 CFR § 320.22 (b) (3),¹ The test product is deemed bioequivalent to the reference-listed drug (RLD) product, Derma-Smoothe/FS® (fluocinolone acetonide) Topical Oil, 0.01% (Body Oil), manufactured by Hill Dermaceuticals, Inc. (NDA # 019452 approved on November 09, 2005).

The application is **acceptable**.

¹ Code of Federal Regulations (21 CFR 320.22 (b) (3), link: <http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfCFR/CFRSearch.cfm>. Last accessed: May 10, 2011

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3 SUBMISSION SUMMARY

3.1 Drug Product Information²

Test Product	Fluocinolone Acetonide Topical Oil, 0.01% (Body Oil)
Reference Product	Derma-Smoothe/FS® (fluocinolone acetonide) Topical Oil, 0.01% (Body Oil)
RLD Manufacturer	Hill Dermaceuticals, Inc.
NDA No.	019452
RLD Approval Date	November 09, 2005
Indication³	Derma-Smoothe/FS is a low to medium potency corticosteroid indicated: <ul style="list-style-type: none">• In adult patients for the treatment of atopic dermatitis. (Body Oil).• In pediatric patients 2 years and older with moderate to severe atopic dermatitis (Body Oil). It may be used for up to 4 weeks.

Note: As per the electronic Orange Book, there are a total of 3 products (scalp, body and otic) with the same NDA # 019452. Product – 1 is approved on February 03, 1988. Product – 2 is approved on November 09, 2005. Product – 3 is approved on November 09, 2005 as an ear (otic) solution. Product 1 and 2 are not clearly demarcated.

3.2 PK/PD Information³

Bioavailability	The extent of percutaneous absorption of topical corticosteroids is determined by many factors including the vehicle and the integrity of the epidermal barrier. Occlusion of topical corticosteroids can enhance penetration. Topical corticosteroids can be absorbed from normal intact skin. Also, inflammation and/or other disease processes in the skin can increase percutaneous absorption.
Food Effect	N/A
Tmax	N/A
Metabolism & Excretion⁴	Fluocinolone is fluorinated and also contains a substituted 17-hydroxyl group, it is not metabolized in the skin. Repeated application results in a cumulative depot effect in the skin, which may lead to a prolonged duration of action and increased systemic absorption. Fluocinolone is metabolized primarily in the liver and excreted by the kidneys. Some of the topical corticosteroids and their metabolites are also excreted into the bile.
Half-life	Not available
Drug Specific Issues	Derma-Smoothe/FS® for atopic dermatitis in adults (Body Oil): For the treatment of atopic dermatitis, Derma-Smoothe/FS® should be applied

² Electronic Orange Book. Search term: NDA # 019452, last accessed: May 10, 2011.

³ Drugs@fda, link http://www.accessdata.fda.gov/drugsatfda_docs/label/2005/019452s016,019,020lbl.pdf, action date: 11/09/2005. Last accessed: May 10, 2011.

⁴ Clinical Pharmacology website, link: <http://www.clinicalpharmacology-ip.com/Forms/Monograph/monograph.aspx?cpnum=1340&sec=monphar>, last accessed date: May 10, 2011

	<p>as a thin film to the affected area three times daily.</p> <p>Derma-Smoothe/FS® for atopic dermatitis in pediatric patients 2 years and older (Body Oil): Moisten skin. Apply Derma-Smoothe/FS® as a thin film to the affected areas twice daily for no longer than four weeks.</p> <p>Systemic absorption of topical corticosteroids can produce reversible hypothalamic-pituitary-adrenal (HPA) axis suppression with the potential for glucocorticosteroid insufficiency after withdrawal of treatment. Manifestations of Cushing's syndrome, hyperglycemia, and glucosuria can also be produced in some patients by systemic absorption of topical corticosteroids while on treatment.</p> <p>This product contains refined peanut oil NF.</p>
--	--

3.3 OGD Recommendations for Drug Product

Number of studies recommended:	None
Analytes to measure (in plasma/serum/blood):	NA
Bioequivalence based on:	NA
Waiver request of in-vivo testing:	21 CFR § 320.22 (b) (3)

Source of most recent recommendations:	<p>According to 21 CFR 320.22 (b) (3), a waiver of the requirement for the submission of evidence measuring <i>in vivo</i> bioavailability or demonstrating bioequivalence may be granted to</p> <ul style="list-style-type: none">(i) a solution for application to the skin, an oral solution, elixir, syrup, tincture, a solution for aerosolization or nebulization, a nasal solution, or similar other solubilized form; and(ii) Contains an active drug ingredient in the same concentration and dosage form as a drug product that is the subject of an approved full new drug application or abbreviated new drug application; and(iii) Contains no inactive ingredient or other change in formulation from the drug product that is the subject of the approved full new drug application or abbreviated new drug application that may significantly affect absorption of the active drug ingredient or active moiety for products that are systemically absorbed, or that may significantly affect systemic or local availability for products intended to act locally.
---	---

Summary of OGD or DBE History:

The Division of Bioequivalence (DBE) has received the following ANDAs as per DARRTS⁵. The following ANDA's does not indicate if the product is specifically for scalp, body or otic application

ANDA	Firm	Dosage form and Strength	Status
(b) (4)			
091306	IDENTI PHARMACEUTICALS INC	0.01% Oil	Pending
201759	IDENTI PHARMACEUTICALS INC	0.01% Oil	Pending
201764 *	IDENTI PHARMACEU	0.01% Oil	Pending

(b) (4)

(b) (4)

*201764 is currently under review

Currently, there are no approved generic versions of this drug product as per the electronic Orange Book and DARRTS.

⁵ DARRTS, search term – fluocinolone acetonide oil, link: <http://darrts.fda.gov:9602/darrts/applicationBasicSearch.do>, last accessed date: May 10, 2011.

3.4 Contents of Submission

Study Types	Yes/No?	How many?
Single-dose fasting	No	0
Single-dose fed	No	0
Steady-state	No	0
In vitro dissolution	No	0
Waiver requests	Yes	1
BCS Waivers	No	0
Clinical Endpoints	No	0
Failed Studies	No	0
Amendments	No	0

3.5 Formulation

Location in appendix	Section 4
If a tablet, is the RLD scored?	N/A
If a tablet, is the test product biobatch scored	N/A
Is the formulation acceptable?	ACCEPTABLE
If not acceptable, why?	

3.6 Waiver Request(s)

Strengths for which waivers are requested	0.01%
Proportional to strength tested in vivo?	N/A
Is dissolution acceptable?	N/A
Waivers granted?	WAIVER GRANTED

3.7 Comments

The test product is qualitatively (Q1) and quantitatively (Q2) the same to the RLD product, except for the lack of fragrances which are present in the RLD product. The Q1 and Q2 differences in the formulation are within $\pm 5\%$ based on the % volume/volume (%v/v) comparison of each of the inactive ingredients. The differences in the formulation pertain to the two fragrances (Cream Fragrance (b) (4) and Balsam Pine Fragrance # (b) (4) that the RLD product contains but the test product does not contain. This difference in formulation is not expected to affect the systemic absorption of the drug product.⁶ Therefore, the waiver request for the test product is granted as per 21 CFR § 320.22 (b) (3).

3.8 Recommendations

1. The Division of Bioequivalence (DBE) agrees that the information submitted by Identi Pharmaceuticals Inc., Fluocinolone Acetonide Topical Oil, 0.01% (Body Oil), meets the requirements of Section 21 CFR § 320.22 (b) (3). The DBE recommends the waiver of bioequivalence testing be granted. Accordingly bioequivalence testing should not be undertaken.
2. The DBE deems Identi Pharmaceuticals Inc., Fluocinolone Acetonide Topical Oil, 0.01% (Body Oil), bioequivalent to the reference-listed drug (RLD) product, Derma-Smothe/FS® (fluocinolone acetonide) Topical Oil, 0.01% (Body Oil) manufactured by Hill Dermaceuticals, Inc.

3.9 Comments for Other OGD Disciplines

Discipline	Comment
None	

4 APPENDIX

Composition of Test (Fluocinolone Acetonide 0.01% Topical Oil (Body Oil) and RLD products:

Ingredients	RLD (Derma Smoothe/FS) ⁶ v/v %	Test Fluocinolone Acetonide ⁷		Difference between RLD and test % (RLD-test)/RLD *100	Function	IIG database
		w/w %	v/v %			
Fluocinolone Acetonide	0.01 w/v	0.011	0.01 g	0	active ingredient	--
Isopropyl Alcohol	(b) (4)					
Isopropyl Myristate						
Light Mineral Oil						
Oleth-2						
Peanut Oil (b) (4) refined)						
Cream						
Fragrance (b) (4)						
Fragrance Balsam Pine # (b) (4)						
Total						

Reviewer’s Comments:

1. The applicant is requesting a waiver from conducting clinical and bioavailability studies under 21 CFR §320.22(b)(1)(i-ii),⁸ in which actually it is applicable to injected parenteral solution, ophthalmic or otic solution. According to the firm’s application on the tested product as a body oil, 21 CFR §320.22(b)(3) is the appropriate regulation
2. The firm’s test product only differs from the RLD product in that it does not contain fragrances (b) (4) whereas the RLD product contains less than (b) (4) volume/volume of fragrances. All other qualitatively (Q1) and quantitatively (Q2) differences in the formulation are within ± 5% based on the % volume/volume comparison of each of the inactive ingredients
3. The Division of Bioequivalence (DBE) had previously submitted a clinical consult to the Clinical Division in the Office of Generic Drugs to request the clinical opinion on the safety and efficacy effect, if any, of the lack of fragrances in the test formulation, Fluocinolone Acetonide Oil, 0.01% (Ear Drops), ANDA # 091306.⁹ In a consult to the Division of Dermatology and Dental Products in the

⁶ DARRTS ANDA 091306 REV-CLBIOEQ-01 (Clinical Endpoint Review). Submission date 8-31-2010. The holder of NDA019452 has the same formulation for the topical and otic products in this application.

⁷ EDR ANDA201764 Module 2.3.P and 3.2.P.1 (Description and composition of drug product), Letter date 11-5-2010. Last accessed May 10, 2011

⁸ EDR ANDA 201764 Module 5.3.1 Bioequivalence/Bioavailability and Module 1.12.15 request for Waiver. Letter Date 11-5-2010. Last accessed 11-16-2010

⁹ DARRTS ANDA091306 FRM-ADMIN-44 (DBE Review Request). Submission date 6-30-2009. Last accessed 12-14-2010

Office of New Drugs, it was determined that omission of the two fragrance components would not affect the safety and efficacy of the proposed generic product, Fluocinolone Acetonide Oil, 0.01% (Ear Drops), ANDA # 091306.¹⁰ The combined amount of these fragrance ingredients is only (b) (4) % of the total % v/v of the RLD product. According to the consult result from ANDA091306, the absence of the fragrances in test product is acceptable.

4. The firm's test formulation is acceptable.

¹⁰ DARRTS ANDA091306 CONSULT REV-CLINICAL-01 (General Consult Request). Submission date 9-8-2009. Last accessed 12-14-2010.

BIOEQUIVALENCE COMMENTS TO BE PROVIDED TO THE APPLICANT

ANDA: 201764

APPLICANT: Identi Pharmaceuticals Inc.

DRUG PRODUCT: Fluocinolone Acetonide 0.01% Topical Oil
(Body Oil),

The Division of Bioequivalence has completed its review and has no further questions at this time.

Please note that the bioequivalence comments provided in this communication are preliminary. These comments are subject to revision after review of the entire application, upon consideration of the chemistry, manufacturing and controls, microbiology, labeling, or other scientific or regulatory issues. Please be advised that these reviews may result in the need for additional bioequivalence information and/or studies, or may result in a conclusion that the proposed formulation is not approvable.

Sincerely yours,

{See appended electronic signature page}

Dale P. Conner, Pharm.D.
Director, Division of Bioequivalence I
Office of Generic Drugs
Center for Drug Evaluation and Research

5 OUTCOME PAGE

ANDA: 201764

Productivity:

<i>ID</i>	<i>Letter Date</i>	<i>Productivity Category</i>	<i>Sub Category</i>	<i>Productivity</i>	<i>Subtotal</i>
13980	11/5/2010	Other	Waiver Topical	1	1
				Bean Total:	1

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

SANTHOSH K PABBA
05/18/2011

APRIL C BRADDY
05/19/2011

HOAINHON N CARAMENICO on behalf of DALE P CONNER
05/23/2011

**BIOEQUIVALENCE CHECKLIST
FOR APPLICATION COMPLETENESS**

ANDA# 201764 **FIRM NAME** Identi Pharmaceuticals Inc.

DRUG NAME Fluocinolone Acetonide

DOSAGE FORM Topical Oil Solution

STRENGTH 0.01%

SUBJ: Request for examination of: Examination of the bioequivalence study submitted with ANDA 201764 (submission date November 5th, 2010) for Fluocinolone Acetonide, 0.01% Topical Oil to determine if the application is substantially complete for filling.

Requested by: _____ Date: _____
Chief, Regulatory Support Team, (HFD-615)

	Summary of Findings by Division of Bioequivalence
<input type="checkbox"/> N/A	Study meets statutory requirements
<input type="checkbox"/>	Study does NOT meet statutory requirements
	Reason:
<input checked="" type="checkbox"/>	Waiver meets statutory requirements
<input type="checkbox"/>	Waiver does NOT meet statutory requirements
	Reason:

RECOMMENDATION: **COMPLETE** **INCOMPLETE**

_____ Date: _____
Dongmei Lu, Ph.D.
Reviewer

_____ Date: _____
April C. Braddy, Ph.D.
Team Leader

_____ Date: _____
Hoainhon N. Caramenico
Acting Deputy Director

Item Verified:	YES	NO	Required Amount	Amount Sent	Comments
Protocol	<input type="checkbox"/>	<input checked="" type="checkbox"/>			N/A
Assay Methodology	<input type="checkbox"/>	<input checked="" type="checkbox"/>			N/A
Procedure SOP	<input type="checkbox"/>	<input checked="" type="checkbox"/>			N/A
Methods Validation	<input type="checkbox"/>	<input checked="" type="checkbox"/>			N/A
Study Results Ln/Lin	<input type="checkbox"/>	<input checked="" type="checkbox"/>			N/A
Adverse Events	<input type="checkbox"/>	<input checked="" type="checkbox"/>			N/A
IRB Approval	<input type="checkbox"/>	<input checked="" type="checkbox"/>			N/A
Dissolution Data	<input type="checkbox"/>	<input checked="" type="checkbox"/>			N/A
Pre-screening of Patients	<input type="checkbox"/>	<input checked="" type="checkbox"/>			N/A
Chromatograms	<input type="checkbox"/>	<input checked="" type="checkbox"/>			N/A for Biosamples
Consent Forms	<input type="checkbox"/>	<input checked="" type="checkbox"/>			N/A
Composition	<input checked="" type="checkbox"/>	<input type="checkbox"/>			Module 3.2.P.1 Description and Composition of the Drug Product
Summary of Study	<input type="checkbox"/>	<input checked="" type="checkbox"/>			N/A (there is no clinical study in this application)
Individual Data & Graphs, Linear & Ln	<input type="checkbox"/>	<input checked="" type="checkbox"/>			N/A
PK/PD Data Disk Submitted)	<input type="checkbox"/>	<input checked="" type="checkbox"/>			N/A
Randomization Schedule	<input type="checkbox"/>	<input checked="" type="checkbox"/>			N/A
Protocol Deviations	<input type="checkbox"/>	<input checked="" type="checkbox"/>			N/A
Clinical Site	<input type="checkbox"/>	<input checked="" type="checkbox"/>			N/A
Analytical Site	<input type="checkbox"/>	<input checked="" type="checkbox"/>			N/A (there is no analytical site for biosamples)

Study Investigators	<input type="checkbox"/>	<input checked="" type="checkbox"/>			N/A
Medical Records	<input type="checkbox"/>	<input checked="" type="checkbox"/>			N/A
Clinical Raw Data	<input type="checkbox"/>	<input checked="" type="checkbox"/>			N/A
Test Article Inventory	<input type="checkbox"/>	<input checked="" type="checkbox"/>			N/A
BIO Batch Size	<input checked="" type="checkbox"/>	<input type="checkbox"/>			Module 3.2.R Regional Information: m32r1p1-excutd-batch-records.pdf Batch size: (b) (4) Liters (b) (4) kg)
Assay of Active Content Drug	<input checked="" type="checkbox"/>	<input type="checkbox"/>			Module 3.2.P.5.4 Batch Analysis: coa-body-06-oct-2010.pdf Assay: 100.0%
Content Uniformity	<input type="checkbox"/>	<input checked="" type="checkbox"/>			N/A
Date of Manufacture	<input checked="" type="checkbox"/>	<input type="checkbox"/>			Module 3.2.R Regional Information: m32r1p1-excutd-batch-records.pdf Date of Manufacture: 01/14/2010
Exp. Date of RLD	<input checked="" type="checkbox"/>	<input type="checkbox"/>			Module 3.2.P.2 Pharmaceutical Development-m32p2-dev-report.pdf page 3 Lot: H050133; Exp Date: Aug 2007
BioStudy Lot Numbers	<input type="checkbox"/>	<input checked="" type="checkbox"/>			N/A
Statistics	<input type="checkbox"/>	<input checked="" type="checkbox"/>			N/A
Summary results provided by the firm indicate studies pass BE criteria	<input checked="" type="checkbox"/>	<input type="checkbox"/>			Module 1.2 Cover Letters: m1-2-cover-let.pdf. page 3
Waiver requests for other strengths / supporting data	<input type="checkbox"/>	<input checked="" type="checkbox"/>			N/A

Additional Comments regarding the ANDA:

1. ANDA 201764 is an electronic submission.

2. In the applicant's submission, the reference-listed drug is Derma-Smoothe/FS[®] Fluocinolone Acetonide 0.01% Topical Oil (Body Oil) by Hill Dermaceuticals, Inc. approved on November 9th, 2005 under NDA 019452. ¹
3. Derma-Smoothe/FS is a low to medium potency corticosteroid indicated:
 - a. In adult patients for the treatment of atopic dermatitis. (Body Oil)
 - b. In pediatric patients 2 years and older with moderate to severe atopic dermatitis (Body Oil). It may be used for up to 4 weeks
4. The applicant is requesting a waiver from conducting clinical and bioavailability studies under 21 CFR §320.22(b)(1)(i-ii),² in which actually it is applicable to injected parenteral solution, ophthalmic or otic solution. According to the firm's application on the tested product as a body oil, 21 CFR §320.22(b)(3) is the appropriate regulation.
5. There is a data entry error in Module 2.3.P. The Table 1 and Table 3 data are not the same in terms of the formulation (Isopropyl myristate and mineral oil data). However, this may be a review issue.
6. The formulations of the RLD and the test products are as follows:

Ingredients	RLD (Derma Smoothe/FS) ³	Test Fluocinolone Acetonide ⁴		Difference between RLD and test % (RLD-test)/RLD *100	Function	IIG database
		w/w %	v/v %			
	v/v %	w/w %	v/v %			
Fluocinolone Acetonide	0.01 w/v	0.011	0.01 g	0	active ingredient	--
Isopropyl Alcohol	(b) (4)					
Isopropyl Myristate						
Light Mineral Oil						
Oleth-2						
Peanut Oil (b) (4) refined)						
Cream Fragrance (b) (4)						
Fragrance Balsam Pine # (b) (4)						
Total						

7. The firm's test product only differs from the RLD product in that it does not contain fragrances (b) (4) whereas the RLD product contains less than (b) (4) volume/volume of fragrances. All other qualitatively (Q1) and quantitatively (Q2) differences in the formulation are within ± 5% based on the % volume/volume comparison of each of the inactive ingredients
8. The Division of Bioequivalence (DBE) had previously submitted a clinical consult to the Clinical Division in the Office of Generic Drugs to request the clinical opinion on the safety and efficacy effect, if any, of the lack of fragrances in the test formulation, Fluocinolone Acetonide Oil, 0.01%

1 Electronic Orange Book. Last accessed 11-15-2010

2 EDR ANDA 201764 Module 5.3.1 Bioequivalence/Bioavailability and Module 1.12.15 request for Waiver. Letter Date 11-5-2010. Last accessed 11-16-2010

3 DARRTS ANDA 091306 REV-CLBIOEQ-01 (Clinical Endpoint Review). Submission date 8-31-2010. Last accessed 12-8-2010. The holder of NDA019452 has the same formulation for the topical and otic products in this application.

4 EDR ANDA201764 Module 2.3.P Latter date 11-5-2010. Last accessed 11-17-2010

(Ear Drops), ANDA # 091306.⁵ In a consult to the Division of Dermatology and Dental Products in the Office of New Drugs, it was determined that omission of the two fragrance components would not affect the safety and efficacy of the proposed generic product, Fluocinolone Acetonide Oil, 0.01% (Ear Drops), ANDA # 091306.⁶ The combined amount of these fragrance ingredients is only (b) (4)% of the total %v/v of the RLD product. According to the consult result from ANDA091306, the absence of the fragrances in test product is acceptable.

Overall, this application is **acceptable** for filling.

5 DARRTS ANDA091306 FRM-ADMIN-44 (DBE Review Request). Submission date 6-30-2009. Last accessed 12-14-2010

6 DARRTS ANDA091306 CONSULT REV-CLINICAL-01 (General Consult Request). Submission date 9-8-2009. Last accessed 12-14-2010.

Completed Assignment for 201764 ID: 12609

Reviewer: Lu, Dongmei

Date

Completed:

Verifier: ,

Date Verified:

Division: Division of Bioequivalence

Description Checklist-fluocinolone

: Acetonide

Productivity:

<i>ID</i>	<i>Letter Date</i>	<i>Productivity Category</i>	<i>Sub Category</i>	<i>Productivity</i>	<i>Subtotal</i>
12609	11/5/2010	Paragraph 4	Paragraph 4 Checklist	1	1
				Bean Total:	1

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

DONGMEI LU
12/15/2010

APRIL C BRADDY
12/15/2010

HOAINHON N CARAMENICO on behalf of DALE P CONNER
12/16/2010

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
ANDA 201764

ADMINISTRATIVE and CORRESPONDENCE
DOCUMENTS



Office of Generic Drugs
Food and Drug Administration
Center for Drug Evaluation and Research
Document Control Room
7620 Standish Place
Rockville, MD 20855-2773

November 15, 2011

**RE: ANDA 201-764 Fluocinolone Acetonide Topical Oil 0.01% (Body Oil)
eCTD 0008 Correspondence**

Dear Sir/ Madam:

Pursuant to *Code of Federal Regulations* Title 21 §314.60, SciRegs International Inc., US Agent for Identi Pharmaceuticals, LLC, here within submits correspondence to our abbreviated new drug application (ANDA 201-764) for Fluocinolone Acetonide Topical Oil 0.01% (Body Oil).

Please be advised that there was a typographical error made to the filing form for the Applicant Information section, name of applicant. Identi Pharmaceuticals is a limited liability company (LLC) but was inadvertently listed an incorporation (Inc). Please address all future correspondence in relation to this ANDA to Identi Pharmaceuticals LLC.

This completes our submission. This submission is filed in eCTD format. A Letter of Non-Repudiation for SciRegs International Inc. has been submitted to the Agency under separate cover dated, February 1, 2008. Please contact C. Jeanne Taborsky, SciRegs International Inc. at phone (410) 309-3145; fax (410) 309-6145, if you have any questions concerning this submission.

Sincerely yours,

C. Jeanne Taborsky,
US Regulatory Agent
SciRegs International Inc.

ROUTING SHEET

APPROVAL TENTATIVE APPROVAL SUPPLEMENTAL APPROVAL (NEW STRENGTH) CGMP

Division: **I** Team: **13** PM: **Trang Tran**

Electronic ANDA:
Yes No

ANDA #: **201764**

Firm Name: **Identi Pharmaceuticals Inc.**

ANDA Name: **Fluocinolone Acetonide Topical Oil, 0.01% (Body Oil)**

RLD Name: **Smothe/FS Topical Oil, 0.01% (Body Oil)**

Electronic AP Routing Summary Located:

V:\Chemistry Division I\Team 13\Electronic AP Summary\201764.ARS.doc

AP/TA Letter Located:

V:\Chemistry Division I\Team 13\FIRMSAM\Identi\LTRS&RVS\201764.AP.DOC

Project Manager Evaluation:

Date: **9/21/11** Initials: **TT**

- Previously reviewed and tentatively approved --- Date _____
 Previously reviewed and CGMP Complete Response issued -- Date _____

Original Rec'd date <u>11/05/10</u>	Date of Application <u>11/05/10</u>	Date Acceptable for Filing <u>11/05/10</u>
Patent Certification (type) <u>II</u>	Date Patent/Excl. expires <u>N/A</u>	Citizens' Petition/Legal Case? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> (If YES, attach email from PM to CP coord)
First Generic Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> DMF#: ^{(b) (4)} (provide MF Jackets)	Priority Approval (Top 100, PEPFAR, etc.)? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Comment: Prepared Draft Press Release sent to Cecelia Parise Yes <input type="checkbox"/> No <input type="checkbox"/> Date:	
<input type="checkbox"/> Suitability Petition/Pediatric Waiver	Pediatric Waiver Request: Accepted <input type="checkbox"/> Rejected <input type="checkbox"/> Pending <input type="checkbox"/>	

EER Status: Pending Acceptable OAI *EES Date Acceptable: 3/10/11* Warning Letter Issued; Date:
Has there been an amendment providing for a Major change in formulation since filing? Yes No Comment:
Date of Acceptable Quality (Chemistry) 10/13/11 Addendum Needed: Yes No Comment:
Date of Acceptable Bio 5/23/11 Bio reviews in DARRTS: Yes No (Volume location:)
Date of Acceptable Labeling 10/12/11 Attached labeling to Letter: Yes No Comment:
Date of Acceptable Sterility Assurance (Micro) N/A

Methods Val. Samples Pending: Yes No ; Commitment Rcvd. from Firm: Yes No

Post Marketing Agreement (PMA): Yes No (If yes, email PM Coordinator) Comment:

Modified-release dosage form: Yes No (If yes, enter dissolution information in Letter)

Routing:

Labeling Endorsement, Date emailed: _____ REMS Required: Yes No REMS Acceptable: Yes No

Regulatory Support

Paragraph 4 Review (Dave Read, Susan Levine), Date emailed: _____

Division

1st Generic Review

Bob West / Peter Rickman

Keith Webber

Filed AP Routing Summary in DARRTs

Notified Firm and Faxed Copy of Approval Letter

Sent Email to "CDER-OGDAPPROVALS" distribution list

OGD APPROVAL ROUTING SUMMARY

1. **Regulatory Support Branch Evaluation**

Martin Shimer

Date: 10/3/2011

Chief, Reg. Support Branch

Initials: MHS

Contains GDEA certification: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> (required if sub after 6/1/92)	Determ. of Involvement? Yes <input type="checkbox"/> No <input type="checkbox"/>
Patent/Exclusivity Certification: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If Para. IV Certification- did applicant: Notify patent holder/NDA holder Yes <input type="checkbox"/> No <input type="checkbox"/> Was applicant sued w/in 45 days: Yes <input type="checkbox"/> No <input type="checkbox"/> Has case been settled: Yes <input type="checkbox"/> No <input type="checkbox"/> Date settled: Is applicant eligible for 180 day	Pediatric Exclusivity System RLD = _____ NDA# _____ Date Checked _____ Nothing Submitted <input type="checkbox"/> Written request issued <input type="checkbox"/> Study Submitted <input type="checkbox"/>
Generic Drugs Exclusivity for each strength: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Date of latest Labeling Review/Approval Summary _____	
Any filing status changes requiring addition Labeling Review Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Type of Letter: <input checked="" type="checkbox"/> APPROVAL <input type="checkbox"/> TENTATIVE APPROVAL <input type="checkbox"/> SUPPLEMENTAL APPROVAL (NEW STRENGTH) <input type="checkbox"/> CGMP <input type="checkbox"/> OTHER:	
Comments: ANDA submitted on 11/5/2010, BOS=Derma-Smoother/FS Topical Oil NDA 19452, PII cert provided. ANDA ack for filing on 11/5/2010(LO dated 2/7/2011). There are no remaining unexpired patents or exclusivities which protect the RLD. This ANDA is eligible for immediate Full Approval.	

2. **Labeling Endorsement**

Reviewer, _____ :
Date _____
Initials _____

Labeling Team Leader, _____ :
Date _____
Initials _____

REMS required? Yes No
REMS acceptable? Yes No n/a

Comments:

3. **Paragraph IV Evaluation**

PIV's Only

David Read
OGD Regulatory Counsel
Pre-MMA Language included
Post-MMA Language Included
Comments:

Date _____
Initials _____

4. **Quality Division Director /Deputy Director Evaluation**

Chemistry Div. I (Raw)
Comments: CMC Approvable

Date 10/13/11
Initials ASR

5. **First Generic Evaluation**

First Generics Only

Frank Holcombe
Assoc. Dir. For Chemistry
Comments: (First generic drug review)

Date _____
Initials _____

OGD Office Management Evaluation

6. **Peter Rickman**

Date 10/17/2011

Director, DLPS

Initials wpr

Para.IV Patent Cert: Yes No

Pending Legal Action: Yes No

Petition: Yes No

Comments: BOS=Derma-Smoother/FS Topical Oil NDA 19452, applicant provided a PII patent cert. there are no remaining unexpired patents or exclusivities which protect the RLD. chemistry acceptable 10/13/11. bio acceptable 5/23/2011 (waiver granted). labeling acceptable 10/12/2011. EER acceptable 3/10/2011. this ANDA is eligible for immediate Full Approval.

AND/OR

7. **Robert L. West**

Date _____

Deputy Director, OGD

Initials _____

Para.IV Patent Cert: Yes No

Pending Legal Action: Yes No

Petition: Yes No

Press Release Acceptable

Date PETS checked for first generic drug _____

Comments:

8. ***OGD Director Evaluation***

Keith Webber

Deputy Director, OPS

Comments:

First Generic Approval

PD or Clinical for BE

Special Scientific or Reg.Issue

Press Release Acceptable

Comments:

9. Project Manager

Date 10/17/11

Initials TT

Check Communication and Routing Summary into DARRTS

EER DATA:

APPEARS THIS WAY ON THE ORIGINAL

DARRTS Application History:

APPEARS THIS WAY ON THE ORIGINAL

Orange Book Report:

APPEARS THIS WAY ON THE ORIGINAL

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

TRANG Q TRAN
10/17/2011

Telephone Fax

ANDA 201764

OFFICE OF GENERIC DRUGS, CDER, FDA
Document Control Room, Metro Park North I
7520 Standish Place
Rockville, MD 20855-2773
240-276-8984



TO: Identi Pharmaceuticals, LLC.

TEL: 410 309-3145

ATTN: Jeanne Taborsky

FAX: 410 309-6145

FROM: Beverly Weitzman

This facsimile is in reference to your abbreviated new drug application submitted pursuant to Section 505(j) of the Federal Food, Drug, and Cosmetic Act for Fluocinonide Acetonide Oil (Body Oil)

Pages (including cover): 3

SPECIAL INSTRUCTIONS:

Effective 01-Aug-2010, the new mailing address for Abbreviated New Drug Application (ANDA) Regulatory Documents has become:

***Office of Generic Drugs
Document Control Room
7620 Standish Place
Rockville, Maryland 20855***

ANDAs will only be accepted at the new mailing address listed above. For further information, please refer to the following websites prior to submitting your ANDA Regulatory documents: Office of Generic Drugs

(OGD): <http://www.fda.gov/cder/ogd> or Federal Register: <http://www.gpoaccess.gov/fr/>

THIS DOCUMENT IS INTENDED ONLY FOR THE USE OF THE PARTY TO WHOM IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL, OR PROTECTED FROM DISCLOSURE UNDER APPLICABLE LAW.

If received by someone other than the addressee or a person authorized to deliver this document to the addressee, you are hereby notified that any disclosure, dissemination, copying, or other action to the content of this communication is not authorized. If you have received this document in error, please immediately notify us by telephone and return it to us by mail at the above address.

**REVIEW OF PROFESSIONAL LABELING #1
DIVISION OF LABELING AND PROGRAM SUPPORT
LABELING REVIEW BRANCH**

ANDA Number: 201764

Date of Submission: November 5, 2010 and May 12, 2011

Applicant's Name: Identi Pharmaceuticals, LLC.

Established Name: Fluocinolone Acetonide Oil, 0.01% (Body Oil)

Labeling Comments:

1. **CONTAINER:** Satisfactory in DRAFT.
2. **CARTON:** Satisfactory in DRAFT.
3. **INSERT:** Satisfactory in Final Print.

Submit final printed labeling electronically.

Prior to approval, it may be necessary to revise your labeling subsequent to approved changes for the reference listed drug. In order to keep ANDA labeling current, we suggest that you subscribe to the daily or weekly updates of new documents posted on the CDER web site at the following address -

http://service.govdelivery.com/service/subscribe.html?code=USFDA_17

{See appended electronic signature page}

Wm. Peter Rickman
Director
Division of Labeling and Program Support
Office of Generic Drugs
Center for Drug Evaluation and Research

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

JOHN F GRACE
10/11/2011
for Wm Peter Rickman



SCIREGS International Inc

Scientific and Regulatory Affairs Consulting

SciRegs International, Inc.
6333 Summercrest Dr.
Columbia, MD 21045 USA

Office of Generic Drugs
Food and Drug Administration
Center for Drug Evaluation and Research
Document Control Room
7620 Standish Place
Rockville, MD 20855-2773

October 7, 2011

**RE: ANDA 201-764 Fluocinolone Acetonide 0.01% Topical Oil (Body Oil)
eCTD 0007 Labeling Amendment – Final Printed Labeling**

Dear Sir/ Madam:

Pursuant to *Code of Federal Regulations* Title 21 § 314.96, SciRegs International Inc., US Agent for Identi Pharmaceuticals, LLC, here within submits a labeling amendment to our abbreviated new drug application (ANDA 201-764) for Fluocinolone Acetonide 0.01% Topical Oil (Body Oil). On October 7, 2011, Identi received the following telephone deficiency (by e-mail) from Beverly Weitzman, Labeling Reviewer, Office of Generic Drugs:

1. *Please provide final printed labeling.*

The final printed bottle and carton labels are included in [Section 1.14.2.1 Final Labels](#). The Final Printed Label version of the insert is provided in [Section 1.14.2.2 Final Package Insert](#). The SPL labeling has also been provided in [Section 1.14.2.3 Final Label Text](#).

This completes our submission. This submission is filed in eCTD format. A Letter of Non-Repudiation for SciRegs International Inc. has been submitted to the Agency under separate cover dated, February 1, 2008. Please contact C. Jeanne Taborsky, SciRegs International Inc. at phone (410) 309-3145; fax (410) 309-6145, if you have any questions concerning this submission.

Sincerely yours,

C. Jeanne Taborsky,
US Regulatory Agent
SciRegs International Inc.



Office of Generic Drugs
Food and Drug Administration
Center for Drug Evaluation and Research
Document Control Room
7620 Standish Place
Rockville, MD 20855-2773

September 29, 2011

**RE: ANDA 201-764 Fluocinolone Acetonide 0.01% Topical Oil (Body Oil)
eCTD 0006 Telephone Amendment**

Dear Sir/ Madam:

Pursuant to *Code of Federal Regulations* Title 21 § 314.96, SciRegs International Inc., US Agent for Identi Pharmaceuticals, LLC, here within submits a telephone amendment to our abbreviated new drug application (ANDA 201-764) for Fluocinolone Acetonide 0.01% Topical Oil (Body Oil). On September 26, 2011, Identi received the following telephone deficiency (by e-mail) from Richard D. Chang Chemistry Reviewer, Office of Generic Drugs:

1. *Please remove the following tests and specifications from your drug product release and stability specifications:* [REDACTED] (b) (4)

[REDACTED] Please submit a revised drug product release and stability specifications.

As requested, Identi removed the following tests and specifications from our drug product release and stability specifications: [REDACTED] (b) (4)

[REDACTED], and submitted revised drug product release specifications in [Section 3.2.P.5.1 Specifications](#) and stability specifications in [Section 3.2.P.8.1 Stability](#). The method for related compounds and assay has also been revised to reflect the changes to the impurities reporting. The revised [method 701-AS-RC](#) is provided herein.

This completes our submission. This submission is filed in eCTD format. A Letter of Non-Repudiation for SciRegs International Inc. has been submitted to the Agency under separate cover dated, February 1, 2008. Please contact C. Jeanne Taborsky, SciRegs International Inc. at phone (410) 309-3145; fax (410) 309-6145, if you have any questions concerning this submission.

Sincerely yours,

C. Jeanne Taborsky,
US Regulatory Agent
SciRegs International Inc.

This memo memorializes the basis for the ANDA labeling carve-out of information relating to peanut protein in the labeling for fluocinolone products that reference Hill Dermaceutical's Dema-Smoothe (NDA 19-452).

Background:

The package insert for the reference listed drug (RLD) Derma-Smoothe, (NDA 19-452) includes a statement describing the amino acid analysis or S-ELISA testing methodology for peanut proteins. The statement for the body oil reads, "The peanut oil used in Derma-Smooth/FS is tested for peanut proteins through amino acid analysis which can detect the quantity of amino acids to below 0.5 parts per million," and the statement for the scalp oil and ear drops reads, "Peanut oil used in this product is routinely tested for peanut proteins using a sandwich enzyme-linked immunosorbent assay test (S-ELISA) kit, which can detect peanut proteins to as low as 2.5 parts per million (ppm)."

As described in FDA's Citizen Petition response dated March 25, 2009 (Docket No. 2004-P-0215), the agency has determined that, at this time, there does not appear to be any test (including S-ELISA and amino acid analysis) that has been validated for the purpose of reliably quantifying residual protein in peanut oil. (CP response at 26). The Agency stated that a topical drug formulated with fully refined peanut oil that meets the USP NF standard is "adequately safe to permit approval." The agency further concluded that if manufacturers formulate their products with fully refined peanut oil that meets the USP NF standard, then the "addition of a test to *quantitate protein* in refined peanut oil would not improve the safety of products formulated with this excipient and will not be required." *Id.* at 30 (emphasis in original).

[Redacted text block]

(b) (4)

[Redacted text block]

(b) (4)

Several ANDAs are ready for approval. The generic firms included in their labeling the same statements describing the testing methodology for peanut proteins as the RLD. However, the generic firms, like Hill, (b) (4) The Office of Generic Drugs recommends the statements regarding the amount of residual peanut protein and test method be removed from the insert labeling as follows:

Remove:

Body Oil: The peanut oil used in Derma-Smooth/FS is tested for peanut proteins through amino acid analysis which can detect the quantity of amino acids to below 0.5 parts per million

and

Scalp Oil or Ear Drops: "Peanut oil used in this product is routinely tested for peanut proteins using a sandwich enzyme-linked immunosorbent assay test(S-ELISA) kit, which can detect peanut proteins to as low as 2.5 parts per million (ppm)"

Legal/Regulatory Context and Conclusions

ANDAs are required by statute and regulation to have the same labeling as the listed drug they reference except for differences required because of differences approved under a suitability petition or because the drug product and the RLD "are produced or distributed by different manufacturers." 505(j)(2)(A)(v); 21 C.F.R. 314.94(a)(8)(iv); see also 505(j)(4)(G). The use of the term "same" in the statute and regulations does not mean that the labeling for the ANDA must be identical to that for the RLD. Permissible differences due to difference in manufacturer may include, for example, "differences in expiration date, formulation, bioavailability or pharmacokinetics, labeling revisions made to comply with current FDA labeling guidelines or other guidance, or omission of an indication or other aspect of labeling protected by patent or accorded exclusivity under section 505(j)(5)(F) of the act." 21 C.F.R. 314.94(a)(8)(iv).

FDA has determined that there is no validated assay for residual peanut protein. FDA has further determined that any peanut oil that is fully refined in accordance with the USP NF process is sufficiently safe for use in topical fluocinolone products and cannot be reliably determined to be safer for peanut allergic individuals than any other peanut oil refined in accordance with the USP NF process. As a result, when manufacturers

use peanut oil that is fully refined in accordance with the USP NF process, FDA has determined that the addition of a test to quantitate protein in refined peanut oil would not improve the safety of products formulated with this excipient and will not be required. (CP response at 30.) Accordingly, FDA has determined that no product, NDA or ANDA, should reference in its labeling an unvalidated assay for peanut protein (such as the S-ELISA test or the amino acid test) that implies an additional safety benefit that has not been shown to exist.

In this case, the Hill fluocinolone labeling includes information about assays for peanut protein that have not been validated and FDA has asked Hill to remove references to these assays from the Derma-Smoothe labeling. Although Hill has not yet complied with FDA's request, FDA stands by its conclusion that, based on the information before it, the references to unvalidated assays in the Derma-Smoothe labeling are misleading and should be removed. Given FDA's conclusions about peanut oil in general and the unvalidated nature of the S-ELISA and amino acid assays as described in the Hill CP response [REDACTED] ^{(b) (4)} FDA believes that ANDA applicants referencing Derma-Smoothe should not be required to include this unnecessary and misleading information in their labeling. Accordingly, FDA concludes that ANDA applicants can remove references to assays for residual peanut protein from their labeling to comply with the labeling guidelines that FDA has provided to Hill. The resulting difference between ANDA and RLD labeling is a permitted difference due to difference in manufacturer within the meaning of the statute and regulations.

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

CARRIE L LEMLEY
09/21/2011

WILLIAM P RICKMAN
09/22/2011



Office of Generic Drugs
Food and Drug Administration
Center for Drug Evaluation and Research
Document Control Room
7620 Standish Place
Rockville, MD 20855-2773

August 22, 2011

**RE: ANDA 201-764 Fluocinolone Acetonide Oil 0.01% Body Oil
eCTD 0005 Telephone Amendment**

Dear Sir/ Madam:

Pursuant to *Code of Federal Regulations* Title 21 § 314.96, SciRegs International Inc., US Agent for Identi Pharmaceuticals, LLC, here within submits a Telephone Amendment to our abbreviated new drug application (ANDA 201-764) for Fluocinolone Acetonide Oil 0.01% Body Oil.

On August 9, 2011, Identi received the following telephone deficiency (by e-mail) from Richard Chang, Chemistry Reviewer, Office of Generic Drugs for our abbreviated new drug application (ANDA 091-306) for Fluocinolone Acetonide Oil 0.01% Ear Drops:

“This is in reference to your ANDA 091306 Gratuitous Amendment dated June 08, 2011. Please submit a test method verification report by Amneal for API impurities determination using the supplier's test method.”

On August 18, 2011, we submitted the requested information to ANDA 091-306. Since the same information is submitted to the sister ANDA 201-759 Fluocinolone Acetonide Oil 0.01% Scalp Oil and ANDA 201-764 Fluocinolone Acetonide Oil 0.01% Body Oil, we contacted Richard Chang and were instructed to submit the same information to the sister ANDAs.

As requested, Identi is herein providing a copy of the [method verification report](#) and the [respective test method](#).

This completes our submission. This submission is filed in eCTD format. A Letter of Non-Repudiation for SciRegs International Inc. has been submitted to the Agency under separate cover dated, February 1, 2008. Please contact C. Jeanne Taborsky, SciRegs International Inc. at phone (410) 309-3145; fax (410) 309-6145, if you have any questions concerning this submission.

Sincerely yours,

C. Jeanne Taborsky,
US Regulatory Agent
SciRegs International Inc.

Office of Generic Drugs
Food and Drug Administration
Center for Drug Evaluation and Research
Document Control Room
7620 Standish Place
Rockville, MD 20855-2773

May 12, 2011

**RE: ANDA 201-764 Fluocinolone Acetonide 0.01% Topical Oil (Body Oil)
eCTD 0004 Minor Amendment Chemistry
New Labeling**

Dear Sir/ Madam:

Pursuant to *Code of Federal Regulations* Title 21 § 314.96, SciRegs International, Inc., US Agent for Identi Pharmaceuticals, LLC, here within submits a minor amendment to our abbreviated new drug application (ANDA) for Fluocinolone Acetonide 0.01% Topical Oil (Body Oil). Reference is made to Identi's Original Submission eCTD 0000, submitted November 5, 2010, telephone amendment eCTD 0002 submitted, January 10, 2011, and the gratuitous amendment eCTD 0003 submitted, January 13, 2011.

The agency deficiencies and Identi's responses are as follows:

A. Deficiencies:

1.



The table to which you are referring lists the vendors, not the manufacturers. On this table the vendor is correctly listed and the vendor does not have a DMF. However to alleviate confusion, Identi has revised [Module 2 Section 2.3.P.7 Table 22 Component Vendors](#) to be Component Manufacturers and added the DMF number for the manufacturer.

2. *The specification for Oleth-2 Microbiological limit in the Module 2 is not correct (i.e.,*
 *Please revise.*

As requested we have corrected the typo on Module 2 Section 2.3.P.4 Drug Product: Excipients Table 17 for the limit for Oleth-2. A revised copy of [Module 2.3.P.4 Drug Product: Excipients](#) is provided in pdf and word formats.



3. *As the Oleth-2 and Refined Peanut Oil, NF are considered critical to the stability and safety of your drug product, we request a commitment that a prior approval supplement will be submitted if the supplier and/or grade of these materials are changed.*

Identi commits that a prior approval supplement will be filed to the ANDA in the event that a change in supplier or material grade is made for the Oleth-2 or the Refined Peanut Oil, NF.

4.

(b) (4)

5. *Please provide your calculation of the maximum daily dose for your drug product and tighten your drug product release and stability specifications for Individual Unspecified Impurities, according to the maximum daily dose and ICH Q3B.*

As requested, the calculation for maximum daily dose of the drug product is provided in [Section 3.2.P.5.6 Justification of Specifications](#). The MDD is less than 1 mg per day; therefore, the currently proposed limits for this product meet the ICH limits.

B. In addition to responding to the deficiencies presented above, please note and acknowledge the following comments in your response:

1. *Please provide all available drug product room temperature stability data.*

As requested, all drug product room temperature stability data available to date is provided in [Module 3 Section 3.2.P.8.3 Stability Data to Date](#).

2. *Bioequivalency and labeling information you have provided is pending review. After the reviews are completed, any deficiencies found will be communicated to you separately.*



Identi notes and acknowledges that the bioequivalence and labeling reviews are pending review from their respective departments and that we will be notified via separate communication of any deficiencies.

- 3. All facilities referenced in your ANDA should be in compliance with cGMP at the time of approval. We have requested an evaluation from the Office of Compliance.*

Identi notes and acknowledges that all facilities referenced in the ANDA should be in compliance with cGMP. The facilities referenced in this ANDA that are subject to inspection have been inspected for this product in the inspection for ANDA 91-306 Fluocinolone Acetonide 0.01% Topical Oil within the last two years and are in compliance with current GMPs.

This completes our submission. This ANDA is filed in eCTD format. A Letter of Non-Repudiation for SciRegs International Inc. has been submitted to the Agency under separate cover dated, February 1, 2008. Please contact C. Jeanne Taborsky, SciRegs International Inc. at phone (410) 309-3145; fax (410) 309-6145, if you have any questions concerning this submission.

Sincerely yours,

A handwritten signature in black ink that reads "C. Jeanne Taborsky". The signature is written in a cursive, flowing style.

C. Jeanne Taborsky,
US Regulatory Agent
SciRegs International Inc.

QUALITY DEFICIENCY - MINOR

ANDA 201764

OFFICE OF GENERIC DRUGS, CDER, FDA
Document Control Room, Metro Park North VII
7620 Standish Place
Rockville, Maryland 20855



APPLICANT: Identi Pharmaceuticals Inc.

TEL: (410) 309-3145

ATTN: C. Jeanne Taborsky

FAX: (410) 309-6145

FROM: Trang Q. Tran

FDA CONTACT PHONE: (240) 276-8518

Dear Madam:

This facsimile is in reference to your abbreviated new drug application dated November 5, 2010, submitted pursuant to Section 505(j) of the Federal Food, Drug, and Cosmetic Act for Fluocinolone Acetonide 0.01% Topical Oil (Body Oil).

The Division of Chemistry has completed its review of the submission(s) referenced above and has identified deficiencies which are presented on the attached 2 pages. This facsimile is to be regarded as an official FDA communication and unless requested, a hard copy will not be mailed.

Your amendment should respond to all of the deficiencies listed. **Facsimiles or partial replies will not be considered for review**, nor will the review clock be reactivated until all deficiencies have been addressed. The response to this facsimile will be considered to represent a MINOR AMENDMENT and will be reviewed according to current OGD policies and procedures. Your cover letter should clearly indicate that the response is a **QUALITY MINOR AMENDMENT / RESPONSE TO INFORMATION REQUEST** and should appear prominently in your cover letter.

We also request that you include a copy of this communication with your response. Please direct any questions concerning this communication to the project manager identified above.

SPECIAL INSTRUCTIONS:

*Effective **01-Aug-2010**, the new mailing address for Abbreviated New Drug Application (ANDA) Regulatory Documents will be:*

*Office of Generic Drugs, CDER, FDA
Document Control Room, Metro Park North VII
7620 Standish Place
Rockville, Maryland 20855*

All ANDA documents will only be accepted at the new mailing address listed above. For further information, please refer to the following websites prior to submitting your ANDA Regulatory documents: Office of Generic Drugs (OGD): <http://www.fda.gov/cder/ogd> or Federal Register: <http://www.gpoaccess.gov/fr/>

THIS DOCUMENT IS INTENDED ONLY FOR THE USE OF THE PARTY TO WHOM IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL, OR PROTECTED FROM DISCLOSURE UNDER APPLICABLE LAW.

If received by someone other than the addressee or a person authorized to deliver this document to the addressee, you are hereby notified that any disclosure, dissemination, copying, or other action to the content of this communication is not authorized. If you have received this document in error, please immediately notify us by telephone and return it to us by mail at the above address.

CHEMISTRY COMMENTS TO BE PROVIDED TO THE APPLICANT

ANDA: 201764

APPLICANT: Identi Pharmaceuticals Inc.

DRUG PRODUCT: Fluocinolone Acetonide 0.01% Topical Oil (Body Oil)

The deficiencies presented below represent MINOR deficiencies.

A. Deficiencies:

1. The information regarding component vendors provided in 2.3.P.7 and 3.2.P.7 is not consistent (i.e., (b) (4)
 Please revise.
2. The specification for Oleth-2 Microbiological limit in the Module 2 is not correct (i.e., (b) (4) Please revise.
3. As the Oleth-2 and Refined Peanut Oil, NF are considered critical to the stability and safety of your drug product, we request a commitment that a prior approval supplement will be submitted if the supplier and/or grade of these materials are changed.
4. (b) (4)
5. Please provide your calculation of the maximum daily dose for your drug product and tighten your drug product release and stability specifications for Individual Unspecified Impurities, according to the maximum daily dose and ICH Q3B.

B. In addition to responding to the deficiencies presented above, please note and acknowledge the following comments in your response:

1. Please provide all available drug product room temperature stability data.
2. Bioequivalency and labeling information you have provided is pending review. After the reviews are completed, any deficiencies found will be communicated to you separately.

3. All facilities referenced in your ANDA should be in compliance with cGMP at the time of approval. We have requested an evaluation from the Office of Compliance.

Sincerely yours,

{See appended electronic signature page}

Paul Schwartz, Ph.D.
Acting Director
Division of Chemistry I
Office of Generic Drugs
Center for Drug Evaluation and Research

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

JAMES M FAN
04/26/2011
for Paul Schwartz

OFFICE OF GENERIC DRUGS EXPEDITED REVIEW REQUESTED

ANDA/SUPPLEMENT #: 201764
 DRUG: Fluocinolone Acetonide Topical
 Oil 0.01%

APPLICANT: Identi Pharmaceuticals
 Inc.
 DATE OF SUBMISSION: November 5, 2010

The Office of Generic Drugs MaPP # 5240.1 lists the following criteria for granting expedited review status to a supplemental abbreviated new drug application. At least one of the criteria must be met.

1. PUBLIC HEALTH NEED. Events that affect the availability of a drug for which there is no alternative
2. EXTRAORDINARY HARDSHIP ON THE APPLICANT.
 - a) Catastrophic events such as explosion, fire storms damage.
 - b) Events that could not have been reasonably foreseen and for which the applicant could not plan. Examples include:
 - ◆ Abrupt discontinuation of supply of active ingredient, packaging material, or container closure; and
 - ◆ Relocation of a facility or change in an existing facility because of a catastrophic event (see item 2.a)
3. AGENCY NEED.
 - a) Matters regarding the government's drug purchase program, upon request from the appropriate FDA office.
 - b) Federal or state legal/regulatory actions, including mandated formation changes or labeling changes if it is in the Agency's best interest.
 - c) Expiration-date extension or packaging change when the drug product is the subject of a government contract award.
 - d) Request for approval of a strength that was previously tentatively approved (To be used in those cases where 180-day generic drug exclusivity prevented full approval of all strengths).

RECOMMENDATIONS:

DISCIPLINE	STATUS	SIGNATURE/DATE
Team Project Manager (PM must Endorse)	Grant <input checked="" type="checkbox"/> Deny <input type="checkbox"/>	
Chemistry Team Leader (sign as needed)	Grant <input checked="" type="checkbox"/> Deny <input type="checkbox"/>	
Micro Team Leader (sign as needed)	Grant <input checked="" type="checkbox"/> Deny <input type="checkbox"/>	
Labeling Team Leader (sign as needed)	Grant <input checked="" type="checkbox"/> Deny <input type="checkbox"/>	
Chem. Div./Deputy Director (DO must Endorse)	Grant <input checked="" type="checkbox"/> Deny <input type="checkbox"/>	

RETURN TO PROJECT MANAGER CHEMISTRY TEAM:

- a) When expedited review is denied, notify the applicant by telephone
 DATE

ENTER FORM INTO DFS

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

TIMOTHY G JETTON
02/07/2011

MARTIN H Shimer
03/04/2011

ANDA CHECKLIST FOR CTD or eCTD FORMAT FOR COMPLETENESS and ACCEPTABILITY of an APPLICATION FOR FILING

For More Information on Submission of an ANDA in Electronic Common Technical Document (eCTD)

Format please go to: <http://www.fda.gov/cder/regulatory/ersr/ectd.htm>

*For a Comprehensive Table of Contents Headings and Hierarchy please go to:

<http://www.fda.gov/cder/regulatory/ersr/5640CTOC-v1.2.pdf>

** For more CTD and eCTD informational links see the final page of the ANDA Checklist

*** A model Quality Overall Summary for an immediate release tablet and an extended release capsule can be found on the OGD webpage <http://www.fda.gov/cder/ogd/> ***

ANDA #: 201764

FIRM NAME: IDENTI PHARMACEUTICALS, INC.

PIV: NO

Electronic or Paper Submission: ELECTRONIC (GATEWAY)

RELATED APPLICATION(S): SEE 91-306 FOR FLUOCINOLONE ACETONIDE OIL, 0.01% (EAR DROPS) FROM IDENTI PHARMACEUTICALS, INC. (RLD DERMOTIC OIL)

First Generic Product Received? NO

DRUG NAME: FLUOCINOLONE ACETONIDE

DOSAGE FORM: TOPICAL OIL, 0.01% (BODY OIL)

Review Team: (Bolded/Italicized & Checked indicate Assignment or DARRTS designation)

<i>Quality Team: DC1 TM 13</i> <input checked="" type="checkbox"/> Activity	<i>Bio Team 10: April Braddy</i> Activity <input checked="" type="checkbox"/>
<i>ANDA/Quality RPM: Trang Tran</i> <input checked="" type="checkbox"/> FYI	Bio PM: Diana Solana <input type="checkbox"/> FYI
Quality Team Leader: Fan, James No assignment needed in DARRTS	<i>Clinical Endpoint Team Assignment:</i> <input checked="" type="checkbox"/> Activity
<i>Labeling Reviewer: Beverly Weitzman</i> <input checked="" type="checkbox"/> Activity	<i>Micro Review (No)</i> <input type="checkbox"/> Activity

*****Document Room Note: for New Strength amendments and supplements, if specific reviewer(s) have already been assigned for the original, please assign to those reviewer(s) instead of the default random team(s). *****

Letter Date: NOVEMBER 5, 2010	Received Date: NOVEMBER 5, 2010
Comments: EC- 1 YES	On Cards: YES
Therapeutic Code: 4025010 CORTICOSTEROIDS	
Archival copy: ELECTRONIC (GATEWAY)	Sections I
Review copy: NA	E-Media Disposition: NA
Not applicable to electronic sections	
PART 3 Combination Product Category N Not a Part3 Combo Product	
(Must be completed for ALL Original Applications) Refer to the Part 3 Combination Algorithm	

Reviewing
CSO/CST Tim Jetton

Date 1/20/11

Recommendation:

FILE

REFUSE to RECEIVE

Reference ID: 2901742

Supervisory Concurrence/Date: _____

Date: _____

1. Edit Application Property Type in DARRTS where applicable for
 - a. First Generic Received
 Yes No
 - b. Market Availability
 Rx OTC
 - c. Pepfar
 Yes No
 - d. Product Type
 Small Molecule Drug (usually for most ANDAs except protein drug products)
 - e. USP Drug Product (at time of filing review)
 Yes No
2. Edit Submission Patent Records
 Yes
3. Edit Contacts Database with Bioequivalence Recordation where applicable
 Yes
4. Requested EER
 Yes

ADDITIONAL COMMENTS REGARDING THE ANDA:

1. Jeanne Taborsky 410-309-3145
2. Need sec 2.3 in WORD– sent in 1/10/11
3. Need cGMP certification to 21CFR210 & 211 for drug product manufacturer – sent in 1/10/11
4. Need spectra/chromatograph of test samples of drug substance– sent in 1/10/11
- 5.

MODULE 1**ADMINISTRATIVE**

ACCEPTABLE

1.1	1.1.2 Signed and Completed Application Form (356h) (original signature) (Check Rx/OTC Status) RX YES	<input checked="" type="checkbox"/>
1.2	Cover Letter Dated: NOVEMBER 5, 2010	<input checked="" type="checkbox"/>
1.2.1	Form FDA 3674 (PDF) YES – box a	<input checked="" type="checkbox"/>
*	Table of Contents (paper submission only) YES	<input checked="" type="checkbox"/>
1.3.2	Field Copy Certification (original signature) NA (N/A for E-Submissions)	<input checked="" type="checkbox"/>
1.3.3	Debarment Certification-GDEA (Generic Drug Enforcement Act)/Other: 1. Debarment Certification (original signature) YES 2. List of Convictions statement (original signature) SAME	<input checked="" type="checkbox"/>
1.3.4	Financial Certifications Bioavailability/Bioequivalence Financial Certification (Form FDA 3454) NA Disclosure Statement (Form FDA 3455, submit copy to Regulatory Branch Chief) NA	<input checked="" type="checkbox"/>

<p>1.3.5</p>	<p>1.3.5.1 Patent Information Patents listed for the RLD in the Electronic Orange Book Approved Drug Products with Therapeutic Equivalence Evaluations</p> <p>1.3.5.2 Patent Certification</p> <p>1. Patent number(s) none</p> <p>2. Paragraph: (Check all certifications that apply) MOU <input type="checkbox"/> PI <input type="checkbox"/> PII <input checked="" type="checkbox"/> PIII <input type="checkbox"/> PIV <input type="checkbox"/> (Statement of Notification) <input type="checkbox"/></p> <p>3. Expiration of Patent(s): NA a. Pediatric exclusivity submitted? b. Expiration of Pediatric Exclusivity?</p> <p>4. Exclusivity Statement: YES</p>	<p><input checked="" type="checkbox"/></p>
<p>1.4.1</p>	<p>References</p> <p>Letters of Authorization</p> <p>1. DMF letters of authorization a. Type II DMF authorization letter(s) or synthesis for Active Pharmaceutical Ingredient yes Type II DMF No (b) (4)</p> <p>b. Type III DMF authorization letter(s) for container closure yes</p> <p>2. US Agent Letter of Authorization (U.S. Agent [if needed, countersignature on 356h]) yes</p>	<p><input checked="" type="checkbox"/></p>

(b) (4)

1.12.11	Basis for Submission NDA# : 19-452 Ref Listed Drug: DERMA-SMOOTHIE/FS Firm: HILL DERMACEUTICALS, INC. ANDA suitability petition required? NA If Yes, then is change subject to PREA (change in dosage form, route or active ingredient) see section 1.9.1	<input checked="" type="checkbox"/>
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MODULE 1 (Continued)
ADMINISTRATIVE

ACCEPTABLE

1.12.12	Comparison between Generic Drug and RLD-505(j)(2)(A) 1. Conditions of use yes 2. Active ingredients yes 3. Inactive ingredients yes 4. Route of administration yes 5. Dosage Form yes 6. Strength yes	<input checked="" type="checkbox"/>
1.12.14	Environmental Impact Analysis Statement YES	<input checked="" type="checkbox"/>
1.12.15	Request for Waiver Request for Waiver of In-Vivo BA/BE Study(ies): YES	<input checked="" type="checkbox"/>
1.14.1	Draft Labeling (Mult Copies N/A for E-Submissions) 1.14.1.1 4 copies of draft (each strength and container) yes 1.14.1.2 1 side by side labeling comparison of containers and carton with all differences annotated and explained yes 1.14.1.3 1 package insert (content of labeling) submitted electronically yes ***Was a proprietary name request submitted? no (If yes, send email to Labeling Reviewer indicating such.)	<input checked="" type="checkbox"/>
1.14.3	Listed Drug Labeling 1.14.3.1 1 side by side labeling (package and patient insert) comparison with all differences annotated and explained yes 1.14.3.3 1 RLD label and 1 RLD container label yes	<input checked="" type="checkbox"/>

<p>2.3</p>	<p>Quality Overall Summary (QOS) E-Submission: PDF yes Word Processed e.g., MS Word</p> <p>A model Quality Overall Summary for an immediate release tablet and an extended release capsule can be found on the OGD webpage http://www.fda.gov/cder/ogd/</p> <p>Question based Review (QbR) no</p> <p>2.3.S Drug Substance (Active Pharmaceutical Ingredient) yes 2.3.S.1 General Information 2.3.S.2 Manufacture 2.3.S.3 Characterization 2.3.S.4 Control of Drug Substance 2.3.S.5 Reference Standards or Materials 2.3.S.6 Container Closure System 2.3.S.7 Stability</p> <p>2.3.P Drug Product yes 2.3.P.1 Description and Composition of the Drug Product 2.3.P.2 Pharmaceutical Development 2.3.P.2.1 Components of the Drug Product 2.3.P.2.1.1 Drug Substance 2.3.P.2.1.2 Excipients 2.3.P.2.2 Drug Product 2.3.P.2.3 Manufacturing Process Development 2.3.P.2.4 Container Closure System 2.3.P.3 Manufacture 2.3.P.4 Control of Excipients 2.3.P.5 Control of Drug Product 2.3.P.6 Reference Standards or Materials 2.3.P.7 Container Closure System 2.3.P.8 Stability</p>	<input type="checkbox"/>
<p>2.7</p>	<p>Clinical Summary (Bioequivalence)***waiver requested*** Model Bioequivalence Data Summary Tables E-Submission: PDF Word Processed e.g., MS Word</p> <p>2.7.1 Summary of Biopharmaceutic Studies and Associated Analytical Methods 2.7.1.1 Background and Overview Table 1. Submission Summary Table 4. Bioanalytical Method Validation Table 6. Formulation Data 2.7.1.2 Summary of Results of Individual Studies Table 5. Summary of In Vitro Dissolution 2.7.1.3 Comparison and Analyses of Results Across Studies Table 2. Summary of Bioavailability (BA) Studies Table 3. Statistical Summary of the Comparative BA Data 2.7.1.4 Appendix 2.7.4.1.3 Demographic and Other Characteristics of Study Population Table 7. Demographic Profile of Subjects Completing the Bioequivalence Study 2.7.4.2.1.1 Common Adverse Events Table 8. Incidence of Adverse Events in Individual Studies</p>	<input type="checkbox"/>

MODULE 3

3.2.S DRUG SUBSTANCE

ACCEPTABLE

3.2.S.1	<p>General Information 3.2.S.1.1 Nomenclature 3.2.S.1.2 Structure 3.2.S.1.3 General Properties</p>	☒
3.2.S.2	<p>Manufacturer 3.2.S.2.1 Manufacturer(s) (This section includes contract manufacturers and testing labs) Drug Substance (Active Pharmaceutical Ingredient) 1. Name and Full Address(es) of the Facility(ies) yes 2. Function or Responsibility yes 3. Type II DMF number for API yes 4. CFN or FEI numbers yes NEED cGMP for drug substance manufacturer</p>	☐
3.2.S.3	<p>Characterization</p>	☒
3.2.S.4	<p>Control of Drug Substance (Active Pharmaceutical Ingredient) 3.2.S.4.1 Specification Testing specifications and data from drug substance manufacturer(s) yes 3.2.S.4.2 Analytical Procedures yes 3.2.S.4.3 Validation of Analytical Procedures 1. Spectra and chromatograms for reference standards and test samples usp 2. Samples-Statement of Availability and Identification of: a. Drug Substance yes b. Same lot number(s) yes 3.2.S.4.4 Batch Analysis 1. COA(s) specifications and test results from drug substance mfgr(s) yes 2. Applicant certificate of analysis yes 3.2.S.4.5 Justification of Specification</p>	☒
3.2.S.5	<p>Reference Standards or Materials - usp</p>	☒
3.2.S.6	<p>Container Closure Systems - dmf</p>	☒
3.2.S.7	<p>Stability - dmf</p>	☒

3.2.P.1

Description and Composition of the Drug Product



1. Unit composition

Composition

Table 1: Unit Composition				
Ingredient	w/v	w/w%	IIG limits per topical product	Purpose in formulation
Fluocinolone Acetonide, USP	0.01 g	0.011	NA	Active ingredient
Isopropyl Alcohol, USP	(b) (4)			
Peanut Oil, NF				
Oleth-2				
Isopropyl Myristate, NF				
Mineral Oil, USP				
Total				

Table 2: from IIG Table- amount in our product was qualified by controlled document with Martin Shimer		
Isopropyl Alcohol		(b) (4)
Peanut Oil	topical; oil	
Oleth-2	topical; oil	n/a

2. Inactive ingredients and amounts are appropriate per IIG yes

From Pharm/Tox review dated 6/23/2003 in DFS:

Relevant INDS/NDAs/DMFs:

- IND 33,448 (Derma-Smooth FS for treatment of psoriasis of the scalp; submitted 7/27/89; HFD-540)
- NDA 12-787 (Synalar Cream, fluocinolone acetonide, 0.025%; Corticosteroid responsive dermatoses; HFD-540; approved 2-15-63)
- NDA 13-960 (Synalar Ointment, fluocinolone acetonide, 0.025%; Corticosteroid responsive dermatoses; HFD-540; approved 6-19-63)
- NDA 15-296 (Synalar Solution, fluocinolone acetonide, 0.01%; Corticosteroid responsive dermatoses; HFD-540; approved 5-27-64)
- NDA 16-161 (Synalar HP cream; fluocinolone acetonide; Corticosteroid responsive dermatoses; HFD-540; approved 7-25-67)
- NDA 20-001 (FS shampoo, fluocinolone acetonide, 0.01%; Seborrheic dermatitis; HFD-540; 8-27-90)
- NDA 21-112 (Tri-luma cream, fluocinolone acetonide, 0.01%, hydroquinone, 4%, tretinoin, 0.05%; Cutaneous melasma; HFD-540; 1-18-02)
- (b) (4)
- (b) (4)

Drug class: Corticosteroid

Indication: Atopic dermatitis and psoriasis of the scalp

Clinical formulation:

Each gram of Derma-Smooth FS topical oil contains approximately 0.11 mg of fluocinolone acetonide in a blend of oils which contains isopropyl alcohol, isopropyl myristate, light mineral oil, oleth-2, refined peanut oil NF and fragrances.

Ingredient	Percentage
Refined peanut Oil, NF*	(b) (4)
White Mineral Oil, USP	
Oleth-2	
Isopropyl Myristate, NF	
Isopropyl Alcohol, NF	
Cream Fragrance	(b) (4)
Balsam Pine Fragrance	(b) (4)
Fluocinolone Acetonide, USP	

From ANDA 91306 same product but for Otic use

3.2.P.2	Pharmaceutical Development Pharmaceutical Development Report yes	☒
3.2.P.3	Manufacture 3.2.P.3.1 Manufacture(s) (Finished Dosage Manufacturer and Outside Contract Testing Laboratories) 1. Name and Full Address(es) of the Facility(ies) yes 2. CGMP Certification: Yes 3. Function or Responsibility yes 4. CFN or FEI numbers (b) (4) 3.2.P.3.2 Batch Formula yes 3.2.P.3.3 Description of Manufacturing Process and Process Controls 1. Description of the Manufacturing Process yes 2. Master Production Batch Record(s) for largest intended production runs (no more than 10x pilot batch) with equipment specified 3. If sterile product: Aseptic fill / Terminal sterilization 4. Reprocessing Statement yes 3.2.P.3.4 Controls of Critical Steps and Intermediates 3.2.P.3.5 Process Validation and/or Evaluation 1. Microbiological sterilization validation 2. Filter validation (if aseptic fill)	☒
3.2.P.4	Controls of Excipients (Inactive Ingredients) Source of inactive ingredients identified yes 3.2.P.4.1 Specifications 1. Testing specifications (including identification and characterization) yes 2. Suppliers' COA (specifications and test results) yes 3.2.P.4.2 Analytical Procedures 3.2.P.4.3 Validation of Analytical Procedures 3.2.P.4.4 Justification of Specifications Applicant COA	☒

MODULE 3
3.2.P DRUG PRODUCT

ACCEPTABLE

<p>3.2.P.5</p>	<p>Controls of Drug Product 3.2.P.5.1 Specification(s) yes 3.2.P.5.2 Analytical Procedures yes 3.2.P.5.3 Validation of Analytical Procedures Samples - Statement of Availability and Identification of: 1. Finished Dosage Form yes 2. Same lot numbers lot BB-ST-10001 3.2.P.5.4 Batch Analysis Certificate of Analysis for Finished Dosage Form yes 3.2.P.5.5 Characterization of Impurities 3.2.P.5.6 Justification of Specifications</p>	<p><input checked="" type="checkbox"/></p>
<p>3.2.P.7</p>	<p>Container Closure System 1. Summary of Container/Closure System (if new resin, provide data) yes 2. Components Specification and Test Data yes 3. Packaging Configuration and Sizes yes 4. Container/Closure Testing yes 5. Source of supply and suppliers address yes</p>	<p><input checked="" type="checkbox"/></p>
<p>3.2.P.8</p>	<p>3.2.P.8.1 Stability (Finished Dosage Form) 1. Stability Protocol submitted yes 2. Expiration Dating Period 2yr 3.2.P.8.2 Post-approval Stability and Conclusion Post Approval Stability Protocol and Commitments yes 3.2.P.8.3 Stability Data 1. 3 month accelerated stability data yes 2. Batch numbers on stability records the same as the test batch yes</p>	<p><input checked="" type="checkbox"/></p>

MODULE 3

3.2.R Regional Information

ACCEPTABLE

<p>3.2.R (Drug Substance)</p>	<p>3.2.R.1.S Executed Batch Records for drug substance (if available) 3.2.R.2.S Comparability Protocols 3.2.R.3.S Methods Validation Package Methods Validation Package (3 copies) (Mult Copies N/A for E-Submissions) (Required for Non-USP drugs)</p>	<p><input checked="" type="checkbox"/></p>
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<p>3.2.R (Drug Product)</p>	<p>3.2.R.1.P.1 Executed Batch Records Copy of Executed Batch Record with Equipment Specified, including Packaging Records (Packaging and Labeling Procedures) Batch Reconciliation and Label Reconciliation</p> <div data-bbox="397 739 1185 1291" data-label="Table"> <table border="1"> <tr> <td colspan="2">Fluocinolone Acetonide 0.01% Topical Oil (Body Oil)</td> </tr> <tr> <td colspan="2">Batch Number: BB-ST-10001</td> </tr> <tr> <td colspan="2">BATCH RECONCILIATION</td> </tr> <tr> <td>Theoretical Bulk Yield: (b) (4)</td> <td>Actual Bulk Yield: (b) (4) kg</td> </tr> <tr> <td>Percentage Yield:</td> <td></td> </tr> <tr> <td>Withdrawn for Testing:</td> <td>Batch Yield After Sampling: (b) (4)</td> </tr> <tr> <td colspan="2">PACKAGING RECONCILIATION</td> </tr> <tr> <td>Packaging Batch Numbers:</td> <td>BB-ST-10001A BB-ST-10001B</td> </tr> <tr> <td>Packaging Configuration:</td> <td>(b) (4)</td> </tr> <tr> <td>Fill Size</td> <td></td> </tr> <tr> <td>Quantity Bulk Dispensed</td> <td></td> </tr> <tr> <td>Total Bottles Packaged</td> <td></td> </tr> <tr> <td>Average Fill Weight</td> <td></td> </tr> <tr> <td>Quantity Used</td> <td></td> </tr> <tr> <td>Quantity Rejected</td> <td></td> </tr> <tr> <td>% Reconciliation</td> <td></td> </tr> <tr> <td>Samples used</td> <td></td> </tr> <tr> <td>Release testing</td> <td></td> </tr> <tr> <td>Stability Testing</td> <td></td> </tr> <tr> <td>Amount remaining (reserve)</td> <td></td> </tr> </table> </div> <p>3.2.R.1.P.2 Information on Components 3.2.R.2.P Comparability Protocols 3.2.R.3.P Methods Validation Package Methods Validation Package (3 copies) (Mult Copies N/A for E-Submissions) (Required for Non-USP drugs)</p>	Fluocinolone Acetonide 0.01% Topical Oil (Body Oil)		Batch Number: BB-ST-10001		BATCH RECONCILIATION		Theoretical Bulk Yield: (b) (4)	Actual Bulk Yield: (b) (4) kg	Percentage Yield:		Withdrawn for Testing:	Batch Yield After Sampling: (b) (4)	PACKAGING RECONCILIATION		Packaging Batch Numbers:	BB-ST-10001A BB-ST-10001B	Packaging Configuration:	(b) (4)	Fill Size		Quantity Bulk Dispensed		Total Bottles Packaged		Average Fill Weight		Quantity Used		Quantity Rejected		% Reconciliation		Samples used		Release testing		Stability Testing		Amount remaining (reserve)		<p><input type="checkbox"/></p>
Fluocinolone Acetonide 0.01% Topical Oil (Body Oil)																																										
Batch Number: BB-ST-10001																																										
BATCH RECONCILIATION																																										
Theoretical Bulk Yield: (b) (4)	Actual Bulk Yield: (b) (4) kg																																									
Percentage Yield:																																										
Withdrawn for Testing:	Batch Yield After Sampling: (b) (4)																																									
PACKAGING RECONCILIATION																																										
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Packaging Configuration:	(b) (4)																																									
Fill Size																																										
Quantity Bulk Dispensed																																										
Total Bottles Packaged																																										
Average Fill Weight																																										
Quantity Used																																										
Quantity Rejected																																										
% Reconciliation																																										
Samples used																																										
Release testing																																										
Stability Testing																																										
Amount remaining (reserve)																																										

MODULE 5

CLINICAL STUDY REPORTS

ACCEPTABLE

<p>5.2</p>	<p>Tabular Listing of Clinical Studies</p>	<p><input type="checkbox"/></p>
<p>5.3.1 (complete study data)</p>	<p>Bioavailability/Bioequivalence 1. Formulation data same? a. Comparison of all Strengths (check proportionality of multiple strengths) b. Parenterals, Ophthalmics, Otics and Topicals per 21 CFR 314.94 (a)(9)(iii)-(v) 2. Lot Numbers of Products used in BE Study(ies): 3. Study Type: IN-VIVO PK STUDY(IES) (Continue with the appropriate study type box below)</p>	<p><input type="checkbox"/></p>

	<p>5.3.1.2 Comparative BA/BE Study Reports</p> <ol style="list-style-type: none"> 1. Study(ies) meets BE criteria (90% CI of 80-125, C max, AUC) 2. Summary Bioequivalence tables: <ul style="list-style-type: none"> Table 10. Study Information Table 12. Dropout Information Table 13. Protocol Deviations <p>5.3.1.3</p> <p>In Vitro-In-Vivo Correlation Study Reports</p> <ol style="list-style-type: none"> 1. Summary Bioequivalence tables: <ul style="list-style-type: none"> Table 11. Product Information Table 16. Composition of Meal Used in Fed Bioequivalence Study <p>5.3.1.4</p> <p>Reports of Bioanalytical and Analytical Methods for Human Studies</p> <ol style="list-style-type: none"> 1. Summary Bioequivalence table: <ul style="list-style-type: none"> Table 9. Reanalysis of Study Samples Table 14. Summary of Standard Curve and QC Data for Bioequivalence Sample Analyses Table 15. SOPs Dealing with Bioanalytical Repeats of Study Samples <p>5.3.7</p> <p>Case Report Forms and Individual Patient Listing</p>	<input type="checkbox"/>
5.4	Literature References	<input type="checkbox"/>
	Possible Study Types:	
Study Type	<p>IN-VIVO BE STUDY(IES) with PK ENDPOINTS (i.e., fasting/fed/sprinkle) NA</p> <ol style="list-style-type: none"> 1. Study(ies) meets BE criteria (90% CI of 80-125, C max, AUC) 2. EDR Email: Data Files Submitted: YES SENT TO EDR 3. In-Vitro Dissolution: 	<input type="checkbox"/>
Study Type	<p>IN-VIVO BE STUDY with CLINICAL ENDPOINTS NO</p> <ol style="list-style-type: none"> 1. Properly defined BE endpoints (eval. by Clinical Team) 2. Summary results meet BE criteria: 90% CI of the proportional difference in success rate between test and reference must be within (-0.20, +0.20) for a binary/dichotomous endpoint. For a continuous endpoint, the test/reference ratio of the mean result must be within (0.80, 1.25). 3. Summary results indicate superiority of active treatments (test & reference) over vehicle/placebo (p<0.05) (eval. by Clinical Team) 4. EDR Email: Data Files Submitted 	<input type="checkbox"/>
Study Type	<p>IN-VITRO BE STUDY(IES) (i.e., in vitro binding assays) NO</p> <ol style="list-style-type: none"> 1. Study(ies) meets BE criteria (90% CI of 80-125) 2. EDR Email: Data Files Submitted: 3. In-Vitro Dissolution: 	<input type="checkbox"/>

Study Type	<p>NASALLY ADMINISTERED DRUG PRODUCTS</p> <ol style="list-style-type: none"> 1. <u>Solutions</u> (Q1/Q2 sameness): <ol style="list-style-type: none"> a. In-Vitro Studies (Dose/Spray Content Uniformity, Droplet/Drug Particle Size Distrib., Spray Pattern, Plume Geometry, Priming & Repriming) 2. <u>Suspensions</u> (Q1/Q2 sameness): <ol style="list-style-type: none"> a. <u>In-Vivo PK Study</u> <ol style="list-style-type: none"> 1. Study(ies) meets BE Criteria (90% CI of 80-125, C max, AUC) 2. EDR Email: Data Files Submitted b. <u>In-Vivo BE Study with Clinical End Points</u> <ol style="list-style-type: none"> 1. Properly defined BE endpoints (eval. by Clinical Team) 2. Summary results meet BE criteria (90% CI within +/- 20% of 80-125) 3. Summary results indicate superiority of active treatments (test & reference) over vehicle/placebo (p<0.05) (eval. by Clinical Team) 4. EDR Email: Data Files Submitted c. <u>In-Vitro Studies</u> (Dose/Spray Content Uniformity, Droplet/Drug Particle Size Distrib., Spray Pattern, Plume Geometry, Priming & Repriming) 	<input type="checkbox"/>
Study Type	<p>IN-VIVO BE STUDY(IES) with PD ENDPOINTS (e.g., topical corticosteroid vasoconstrictor studies)</p> <ol style="list-style-type: none"> 1. Pilot Study (determination of ED50) 2. Pivotal Study (study meets BE criteria 90%CI of 80-125) 	<input type="checkbox"/>
Study Type	<p>TRANSDERMAL DELIVERY SYSTEMS</p> <ol style="list-style-type: none"> 1. <u>In-Vivo PK Study</u> <ol style="list-style-type: none"> 1. Study(ies) meet BE Criteria (90% CI of 80-125, C max, AUC) 2. In-Vitro Dissolution 3. EDR Email: Data Files Submitted 2. <u>Adhesion Study</u> 3. <u>Skin Irritation/Sensitization Study</u> 	<input type="checkbox"/>

Updated 10/19/2009

Active Ingredient Search - Windows Internet Explorer

http://www.accessdata.fda.gov/scripts/cder/ob/docs/tempai.cfm

U.S. Food and Drug Administration

Home | Food | Drugs | Medical Devices | Vaccines, Blood & Biologics | Animal & Veterinary | Cosmetics | Radiation-Emitting Products | Tobacco Products

FDA Home

Orange Book: Approved Drug Products with Therapeutic Equivalence Evaluations

Active Ingredient Search Results from "OB_Rx" table for query on "fluocinolone."

Appl No	TE Code	RLD	Active Ingredient	Dosage Form; Route	Strength	Proprietary Name	Applicant
A088170	AT	No	FLUOCINOLONE ACETONIDE	CREAM; TOPICAL	0.01%	FLUOCINOLONE ACETONIDE	FOUGERA
A088169	AT	No	FLUOCINOLONE ACETONIDE	CREAM; TOPICAL	0.025%	FLUOCINOLONE ACETONIDE	FOUGERA
N019452		Yes	FLUOCINOLONE ACETONIDE	OIL/DROPS; OTIC	0.01%	DERMOTIC	HILL DERMAC
N019452		Yes	FLUOCINOLONE ACETONIDE	OIL; TOPICAL	0.01%	DERMA-SMOOTHIE/FS	HILL DERMAC

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Office of Generic Drugs

Local intranet 100%

Orange Book Detail Record Search - Windows Internet Explorer

http://www.accessdata.fda.gov/scripts/cder/ob/docs/obdetail.cfm?Appl_No=019452&TABLE1=OB_Rx

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FDA U.S. Food and Drug Administration A-Z Index Search go

[Home](#) | [Food](#) | [Drugs](#) | [Medical Devices](#) | [Vaccines, Blood & Biologics](#) | [Animal & Veterinary](#) | [Cosmetics](#) | [Radiation-Emitting Products](#) | [Tobacco Products](#)

FDA Home

Orange Book: Approved Drug Products with Therapeutic Equivalence Evaluations

Search results from the "OB_Rx" table for query on "019452."

Active Ingredient:	FLUOCINOLONE ACETONIDE
Dosage Form;Route:	OIL; TOPICAL
Proprietary Name:	DERMA-SMOOTH/FS
Applicant:	HILL DERMAC
Strength:	0.01%
Application Number:	N019452
Product Number:	002
Approval Date:	Nov 9, 2005
Reference Listed Drug	Yes
RX/OTC/DISCN:	RX
TE Code:	

Patent and Exclusivity Info for this product: [View](#)

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Patent and Exclusivity Search Results - Windows Internet Explorer

http://www.accessdata.fda.gov/scripts/cder/ob/docs/patexclnew.cfm?Appl_No=019452&Product_No=002&table1=OB_Rx

U.S. Department of Health & Human Services www.hhs.gov

FDA U.S. Food and Drug Administration

A-Z Index Search go

Home | Food | Drugs | Medical Devices | Vaccines, Blood & Biologics | Animal & Veterinary | Cosmetics | Radiation-Emitting Products | Tobacco Products

FDA Home

Orange Book: Approved Drug Products with Therapeutic Equivalence Evaluations

Patent and Exclusivity Search Results from query on Appl No 019452 Product 002 in the OB_Rx list.

There are no unexpired patents for this product in the Orange Book Database.

There is no unexpired exclusivity for this product.

[View a list of all patent use codes](#)
[View a list of all exclusivity codes](#)

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FDA/Center for Drug Evaluation and Research
Office of Generic Drugs

Establishment Evaluation System ORACLE

Application Drawer

Application: A 201764/000 Sponsor: IDENTI PHARMS
 Drug Name: FLUOCINOLONE ACETONIDE

CFN / FEI	Establishments	Profile	Last Milestone	Last Compliance	OAI
	Name	Code	Name	Date	Status
					(b) (4)

Overall Compliance:

Date	Recommendation	Re-evaluation Date	OAI Alert Comments
		11/2	
		11/2	

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/s/

TIMOTHY G JETTON
02/07/2011

MARTIN H Shimer
02/07/2011



ANDA 201764

SciRegs International, Inc.
U.S. Agent for Identi Pharmaceuticals Inc.
Attention: C. Jeanne Taborsky
6333 Summercrest Drive
Columbia, MD 21045

Dear Madam:

We acknowledge the receipt of your abbreviated new drug application submitted pursuant to Section 505(j) of the Federal Food, Drug and Cosmetic Act.

Reference is also made to the telephone conversation dated January 3, 2011 and your correspondence dated January 10, 2011.

NAME OF DRUG: Fluocinolone Acetonide Topical Oil, 0.01%

DATE OF APPLICATION: November 5, 2010

DATE (RECEIVED) ACCEPTABLE FOR FILING: November 5, 2010

We will correspond with you further after we have had the opportunity to review the application.

Please identify any communications concerning this application with the ANDA number shown above.

Should you have questions concerning this application, contact:

Trang Q. Tran
Project Manager
240-276-8518

Sincerely yours,

{See appended electronic signature page}

Wm Peter Rickman
Director
Division of Labeling and Program Support
Office of Generic Drugs
Center for Drug Evaluation and Research

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

MARTIN H Shimer
02/07/2011
Signing for Wm Peter Rickman

Office of Generic Drugs
Food and Drug Administration
Center for Drug Evaluation and Research
Document Control Room
7620 Standish Place
Rockville, MD 20855-2773

January 13, 2011

**RE: ANDA 201-764 Fluocinolone Acetonide 0.01% Topical Oil (Body Oil)
eCTD 0003 Gratuitous Amendment**

Dear Sir/ Madam:

Pursuant to *Code of Federal Regulations* Title 21 § 314.96, SciRegs International, Inc., US Agent for Identi Pharmaceuticals, LLC, here within submits a gratuitous amendment to our abbreviated new drug application (ANDA) for Fluocinolone Acetonide 0.01% Topical Oil (Body Oil). Reference is made to Identi's Original Submission eCTD 0000, submitted November 5, 2010, and the telephone amendment eCTD 0002 submitted, January 10, 2011.

A typographical error was discovered in Module 2 Drug Product on page 14 of 29, in Table 11 In-process Bulk Testing, Assay results. In the column titled *Top*, the last value for the assay results was incorrectly transcribed as (b) (4) % rather than the correct result of (b) (4) %. [Module 2 Drug Product](#) has been corrected and is provided herein.

Identi is submitting a revised [Module 2.7 Clinical Summary](#) to correct a typographical error. The product is a topical solution and contains the same active and inactive ingredients in the same concentration as the reference listed drug product.

This completes our submission. This ANDA is filed in eCTD format. A Letter of Non-Repudiation for SciRegs International Inc. has been submitted to the Agency under separate cover dated, February 1, 2008. Please contact C. Jeanne Taborsky, SciRegs International Inc. at phone (410) 309-3145; fax (410) 309-6145, if you have any questions concerning this submission.

Sincerely yours,



C. Jeanne Taborsky,
US Regulatory Agent
SciRegs International Inc.

Office of Generic Drugs
Food and Drug Administration
Center for Drug Evaluation and Research
Document Control Room
7620 Standish Place
Rockville, MD 20855-2773

January 10, 2011

**RE: ANDA 201-764 Fluocinolone Acetonide 0.01% Topical Oil (Body Oil)
eCTD 0002 Telephone Amendment**

Dear Sir/ Madam:

Pursuant to *Code of Federal Regulations* Title 21 § 314.96, SciRegs International, Inc., US Agent for Identi Pharmaceuticals, LLC, here within submits a telephone amendment to our abbreviated new drug application (ANDA) for Fluocinolone Acetonide 0.01% Topical Oil (Body Oil). Reference is made to Identi's Original Submission eCTD 0000, submitted November 5, 2010, and the telephone conversation with FDA reviewer Tim Jetton on January 3, 2011.

The following requests were made

1. *Please provide Module 2 documents in WORD version.*

As requested, the WORD versions of the documents for Module 2 from the original submission have been provided herein. Please refer to the following sections: [Module 2 Introduction](#), [Module 2 Drug Substance](#), [Module 2 Drug Product](#) and [Module 2 Clinical Summary](#).

2. *The CGMP Certification for the drug substance manufacturer is not adequate. Please provide a certification stating compliance with 21 CFR 210 and 211*

A CGMP certification for ^{(b) (4)} the drug substance manufacturer, has been revised to include a statement of compliance with 21 CFR 210 and 211. The revised certificate is provided in [Module 3 Section 3.2.S.2.1 Manufacturer](#).

3. *Please provide the spectra and chromatograms for the testing of the drug substance.*

The spectra and chromatogram for the drug substance were inadvertently omitted from the original submission eCTD 0000, dated November 5, 2010. The spectra and chromatogram for the testing of the drug substance is provided in [Module 3 Section 3.2.S.4.4 Batch Analysis](#).



4. *Please provide the certificate of analysis for the drug product with the Lot Number listed on all pages.*

The certificates of analysis for the drug product have been revised to list the batch lot number on all pages. The lot numbers were inadvertently omitted on the versions submitted in the original submission. There have been no changes to the data on the certificates of analysis. The revised certificates of analysis are provided in [Module 3 Section 3.2.P.5.4 Batch Analysis](#).

This completes our submission. This ANDA is filed in eCTD format. A Letter of Non-Repudiation for SciRegs International Inc. has been submitted to the Agency under separate cover dated, February 1, 2008. Please contact C. Jeanne Taborsky, SciRegs International Inc. at phone (410) 309-3145; fax (410) 309-6145, if you have any questions concerning this submission.

Sincerely yours,

A handwritten signature in blue ink that reads "C. Jeanne Taborsky". The signature is written in a cursive style with a large, looping initial "C".

C. Jeanne Taborsky,
US Regulatory Agent
SciRegs International Inc.



SCIREGS International Inc

Scientific and Regulatory Affairs Consulting

SciRegs International, Inc.
6333 Summercrest Dr.
Columbia, MD 21045 USA

Office of Generic Drugs
Food and Drug Administration
Center for Drug Evaluation and Research
Document Control Room
7620 Standish Place
Rockville, MD 20855-2773

December 29, 2010

**RE: ANDA 201-764 Fluocinolone Acetonide 0.01% Topical Oil (Body Oil)
eCTD 0001 Gratuitous Amendment**

Dear Sir/ Madam:

Pursuant to *Code of Federal Regulations* Title 21 § 314.96, SciRegs International, Inc., US Agent for Identi Pharmaceuticals, LLC, here within submits a gratuitous amendment to our abbreviated new drug application (ANDA) for Fluocinolone Acetonide 0.01% Topical Oil (Body Oil). Reference is made to Identi's Original Submission eCTD 0000, submitted November 5, 2010.

(b) (4) was provided as a testing facility for the drug substance and drug product release and stability for the test batch in the original submission. (b) (4) was approved for this testing in the ANDA. Amneal is in the process of completing the methods transfer validation. Identi will continue using (b) (4) for drug substance and drug product release and stability testing until the method transfer validation has been completed at Amneal Pharmaceuticals. A revised stability protocol has been provided in [Module 3 Section 3.2.P.8.1](#).

Please refer to the original submission Section 1.3.3 Debarment for the debarment certification and to Section 3.2.P.3.1 for the CGMP certification. These certifications were submitted in the original ANDA application eCTD 0000 dated, November 5, 2010. We note and acknowledge that all facilities referenced in our ANDA should be in compliance with cGMP at the time of approval. (b) (4) has already been inspected in conjunction with ANDA 91-306 Fluocinolone Acetonide Oil (Ear Drops) in (b) (4). The inspection result was satisfactory.

This completes our submission. This ANDA is filed in eCTD format. A Letter of Non-Repudiation for SciRegs International Inc. has been submitted to the Agency under separate cover dated, February 1, 2008. Please contact C. Jeanne Taborsky, SciRegs International Inc. at phone (410) 309-3145; fax (410) 309-6145, if you have any questions concerning this submission.

Sincerely yours,

C. Jeanne Taborsky,
US Regulatory Agent
SciRegs International Inc.

MEMORANDUM

DEPARTMENT OF HEALTH AND HUMAN SERVICES
PUBLIC HEALTH SERVICE
FOOD AND DRUG ADMINISTRATION
CENTER FOR DRUG EVALUATION AND RESEARCH

DATE : November 9, 2010

TO : Director
Division of Bioequivalence (HFD-650)

FROM : Chief, Regulatory Support Branch
Office of Generic Drugs (HFD-615)

SUBJECT: Examination of the bioequivalence study submitted with an ANDA 201764 for Fluocinolone Acetonide (Topical Body Oil), 0.01% to determine if the application is substantially complete for filing.

Identi Pharmaceuticals Inc. has submitted ANDA 201764 for Fluocinolone Acetonide (Topical Body Oil), 0.01%. In order to accept an ANDA the Agency must formally review and make a determination that the application is substantially complete. Included in this review is a determination that the bioequivalence study is complete, and could establish that the product is bioequivalent.

Please evaluate whether the request for study submitted by Identi Pharmaceuticals Inc. on November 5, 2010 for its Fluocinolone Acetonide product satisfies the statutory requirements of "completeness" so that the ANDA may be filed.

A "complete" bioavailability or bioequivalence study is defined as one that conforms with an appropriate FDA guidance or is reasonable in design and purports to demonstrate that the proposed drug is bioequivalent to the "listed drug".

This is a representation of an electronic record that was signed electronically and this page is the manifestation of the electronic signature.

/s/

EDA E HOWARD
11/10/2010

Office of Generic Drugs
Food and Drug Administration
Center for Drug Evaluation and Research
Document Control Room
7620 Standish Place
Rockville, MD 20855-2773

**RE: ANDA 201-764 Fluocinolone Acetonide 0.01% Topical Oil (Body Oil)
eCTD 0000 Original Submission**

Request for Expedited Review

Dear Sir/ Madam:

Pursuant to Section 505 (j) of the *Federal Food, Drug, and Cosmetic Act*, SciRegs International, Inc., US Regulatory Agent for Identi Pharmaceuticals, LLC, here within submits an abbreviated new drug application (ANDA) for Fluocinolone Acetonide 0.01% Topical Oil (Body Oil). A copy of our letter of Appointment is provided in [Module 1 Section 1.4.1. References](#).

This application references NDA 019452 Derma-Smooth/FS® Fluocinolone Acetonide 0.01% Topical Oil, listed in the *Approved Drug Products with Therapeutic Equivalence Evaluations* (commonly known as the Orange Book), and manufactured by Hill Dermaceuticals, Inc. While the single NDA referenced above currently provides for all three products, ear drops, body oil, and scalp oil, we were instructed by OGD to file separate ANDAs for these products since the labeling, packaging, indications and routes of administration are different. The active ingredient manufacturer, formation, raw material sources, specifications, testing controls and test methods for the finished products are the same for all three of our submissions. ANDA 091-306 Fluocinolone Acetonide Oil 0.01% (Ear Drops) is in the final stages of the review process.

The dosage form, route of administration, active ingredient, potency, and labeling (with the exception of brand name, logo, manufacturer, and NDC number) for Fluocinolone Acetonide 0.01% Topical Oil (Body Oil) are the same as those for Derma-Smooth/FS® Fluocinolone Acetonide 0.01% Topical Oil. An electronic copy of the innovator labeling is provided in [Module 1 Section 1.14.3.2 Approved labeling text for RLD](#) and [Section 1.14.3.3 Labeling Text](#), proposed labeling for Identi's product is provided in [Module 1 Section 1.14.1.1 Draft Labeling](#) and [Section 1.14.1.3 Draft Labeling Text](#), and the side-by-sides are provided in [Module 1 Section 1.14.1.2 Annotated Draft Labeling Text](#) and [Section 1.14.3.1 Annotated Comparison with Listed Drug](#).

(b) (4) is the manufacturer of the Active Pharmaceutical Ingredient (API), Fluocinolone Acetonide, USP, used in Identi's drug product. (b) (4) facility is responsible for manufacturing, testing, and stability of the API. This API manufacturing facility was last inspected by the US FDA, (b) (4).



The API site is ready for inspection. [REDACTED]

(b) (4)

[REDACTED] Information on these facilities is provided in [Module 3 Section 3.2.S.2 Manufacture](#). The sites are ready for inspection. Information on this manufacturer and the drug substance drug master file were reviewed for sister ANDA 091-306 Fluocinolone Acetonide Oil 0.01% (Ear Drops) and found acceptable.

(b) (4)

The drug substance is the subject of an USP monograph; therefore, methods validation was not required for the drug substance assay and was provided only for the drug substance related substances, residual solvents and the drug product. Identi commits to provide any additional information and resolve any issues identified in the methods validation process after approval.

The drug product manufactured in support of this ANDA submission was and will be manufactured at the contract manufacturing facility, Amneal Pharmaceuticals located in Branchburg, NJ. This facility is also responsible for receiving raw materials and components, manufacturing, and packaging the drug product. The facility is FDA registered and meets all applicable cGMPs. The facility was last inspected by US FDA, in July 2010, and was classified as acceptable. The facility is ready for inspection. Additional information regarding this facility is located in [Module 3 Section 3.2.P.3.1 Manufacture](#).

The entire test batch was packaged in [REDACTED] (b) (4) bottles with specially designed continuous thread [REDACTED] (b) (4) closures fitted with [REDACTED] (b) (4) liners. To match the RLD packaging configuration, the container closure system includes a dispensing closure. This closure is provided in the carton and is applied by the consumer at the time of use. Information on the container/closure system is provided in [Module 3 Section 3.2.P.7 Container Closure System](#) and [Module 3.2.R.1.P.2 Information on Components](#). The components were tested in conformance with USP <661> *Containers*. Additional migration and compatibility studies were conducted on the components including the dispensing cap. The closures used for this submission are the same ones used for the ear drop product. The 4-ounce bottles are manufactured by the same company and of the same materials of construction



as the 1-ounce bottles used for sister ANDA 091-306 Fluocinolone Acetonide Oil 0.01% (Ear Drops).

The same test method and validation information submitted and reviewed for ANDA 091306 Fluocinolone Acetonide 0.01% (Ear Drops) and found acceptable is used for this ANDA. FDA verification of the analytical methods is pending.

Stability studies were conducted under a stability protocol that is in conformance with the ICH Stability Guidelines. The drug product is to be stored upright at USP MKT 25°C and shipped USP refrigerated. Identi requests approval of a two-year expiration dating for these products as supported by one, two, and three month's accelerated stability data (40°C ± 2°C / 75% ± 5% RH), and controlled room temperature conditions (25°C ± 2°C / 60% ± 5% RH) to date. A copy of the forced degradation studies is also provided in [Module 3 Section 3.2.P.8.3 Stability Data to Date](#).

Identi is requesting a waiver from in-vivo bioequivalence studies based upon the fact that the formulation for our product is the same (with the exception of the fragrance) as the innovator product. The waiver is located in [Module 1 Section 1.12.15 Request for Waiver](#). Regulations provide for FDA to waive of the submission requirement for evidence of in vivo bioequivalence when the drug product is (1) "a solution for application to the skin," (2) "contains an active drug ingredient in the same concentration and dosage form" as the RLD, and (3) "contains no inactive ingredient or other change in formulation" from the RLD "that may significantly affect systemic or local availability for products intended to act locally." Identi has met the requirements, by reverse engineering the formulation to match the innovator. Additionally, the innovator contended in their petition, that the Peanut Oil was critical to the delivery of the product and Identi believes that it is using Peanut Oil from the same source. The request for waiver of bioequivalence testing has been granted for the ear drop product. Please also reference [Module 5 Section 5.3.1.3 Bioequivalence](#).

This completes our submission. This ANDA is filed in eCTD format. As requested by the agency, WORD versions of Module 2 and labeling are provided in this eCTD submission. The Letter of Non-Repudiation for Identi Pharmaceuticals LLC has been submitted to the Agency under separate cover, dated August 17, 2010. The Letter of Non-Repudiation for SciRegs International Inc. has been submitted to the Agency under separate cover, dated February 1, 2008. Please contact C. Jeanne Taborsky, SciRegs International Inc. at phone (410) 309-3145; fax (410) 309-6145, if you have any questions concerning this submission.

Sincerely yours,

C. Jeanne Taborsky
US Regulatory Agent
SciRegs International Inc.