CENTER FOR DRUG EVALUATION AND RESEARCH

Approval Package for:

APPLICATION NUMBER:

ANDA 40-503

Name:	Hydrocortisone Cream USP 2.5%
Sponsor:	Vintage Pharmaceuticals, LLC
Approval Date:	March 12, 2004

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

ANDA 40-503

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CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

ANDA 40-503

APPROVAL LETTER

ANDA 40-503

MAR 12 2004

Vintage Pharmaceuticals, LLC
Attention: Christopher J. Nascone
120 Vintage Drive
Huntsville, AL 35811

Dear Sir:

This is in reference to your abbreviated new drug application (ANDA) dated July 2, 2002, submitted pursuant to Section 505(j) of the Federal Food, Drug, and Cosmetic Act (the Act), for Hydrocortisone Cream USP, 2.5%.

Reference is also made to your amendments dated July 29, 2003, and January 13, 2004.

We have completed the review of this abbreviated application and have concluded that the drug is safe and effective for use as recommended in the submitted labeling. Accordingly the application is approved. The Division of Bioequivalence has determined your Hydrocortisone Cream USP, 2.5%, to be bioequivalent and, therefore, therapeutically equivalent to the listed drug (Hytone® Cream, 2.5%, of Dermik Laboratories).

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

Post-marketing reporting requirements for this abbreviated application 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.

We request that you submit, in duplicate, any proposed advertising or promotional copy which you intend to use in your initial advertising or promotional campaigns. Please submit all proposed materials in draft or mock-up form, not final print. Submit both copies together with a copy of the final printed labeling to the Division of Drug Marketing, Advertising, and Communications (HFD-40). Please do not use Form FDA 2253

(Transmittal of Advertisements and Promotional Labeling for Drugs for Human Use) for this initial submission.

We call your attention to 21 CFR 314.81(b)(3) which requires that materials for any subsequent advertising or promotional campaign be submitted to our Division of Drug Marketing, Advertising, and Communications (HFD-40) with a completed Form FDA 2253 at the time of their initial use.

Sincerely yours,

Gary Buehler 3/12/04
Director
Office of Generic Drugs
Center for Drug Evaluation and Research

cc: ANDA 40-503
Division File
Field Copy
HFD-610/R. West
HFD-330
HFD-205
HFD-610/Orange Book Staff

Endorsements:
HFD-600/N.Nashed/ NN 3/5/04
HFD-623/J.Fan/ 3/5/04
HFD-617/T.Vu/ 3/6/04
HFD-613/B.Weitzman/ 3/8/04
HFD-613/J.Grace/ 3/9/04

12 pages
3/11/04

V:\FIRMSNZ\VINTAGE\LTRS&REV\40503.ap.DOC
F/T by

APPROVAL

Robert West
3/12/2004

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

ANDA 40-503

APPROVED LABELING

40-503

NDC 0254-7621-68 MAR 1 2 2004 NET WT 15g

HYDROCORTISONE CREAM, USP 2.5%

APPROVAL

Rx only

Vintage

FOR COMPLETE PRODUCT INFORMATION SEE PACKAGE INSERT

DESCRIPTION: Each gram of Hydrocortisone Cream, USP 2.5% contains 25 mg of hydrocortisone in a water washable base of cetyl alcohol, isopropyl palmitate, methylparaben, mineral oil / lanolin alcohol, propylparaben, propylene glycol, propylene glycol stearate, polysorbate 40, purified water, sorbic acid, sorbitan palmitate, stearyl alcohol, xanthan gum.

AVERAGE DOSAGE AND INDICATIONS: For complete product information, see package insert.

For External Use Only. Not for Ophthalmic Use. Keep out of the reach of children.

Keep tightly closed. Store at controlled room temperature 15°- 30° C (59°- 86° F).

Mfg. by:
VINTAGE PHARMACEUTICALS, LLC
HUNTSVILLE, AL 35811
Rev. 5/02 R0
65660 7781

3 0254-7621-68 8

PMS BLACK

PMS 343 Green

PMS 427 Gray

000031

40-503

15g LABEL
ENLARGED TO 130%
BY FOIA STAFF.

NDC 0254-7621-68 MAR 1 2 2004 NET WT 15g

HYDROCORTISONE CREAM, USP 2.5%

APPROVAL

Rx only

Vintage®

FOR COMPLETE PRODUCT INFORMATION SEE PACKAGE INSERT

DESCRIPTION: Each gram of Hydrocortisone Cream, USP 2.5% contains 25 mg of hydrocortisone in a water washable base of cetyl alcohol, isopropyl palmitate, methylparaben, mineral oil / lanolin alcohol, propylparaben, propylene glycol, propylene glycol stearate, polysorbate 40, purified water, sorbic acid, sorbitan palmitate, stearyl alcohol, xanthan gum.

AVERAGE DOSAGE AND INDICATIONS: For complete product information, see package insert.

For External Use Only. Not for Ophthalmic Use. Keep out of the reach of children.

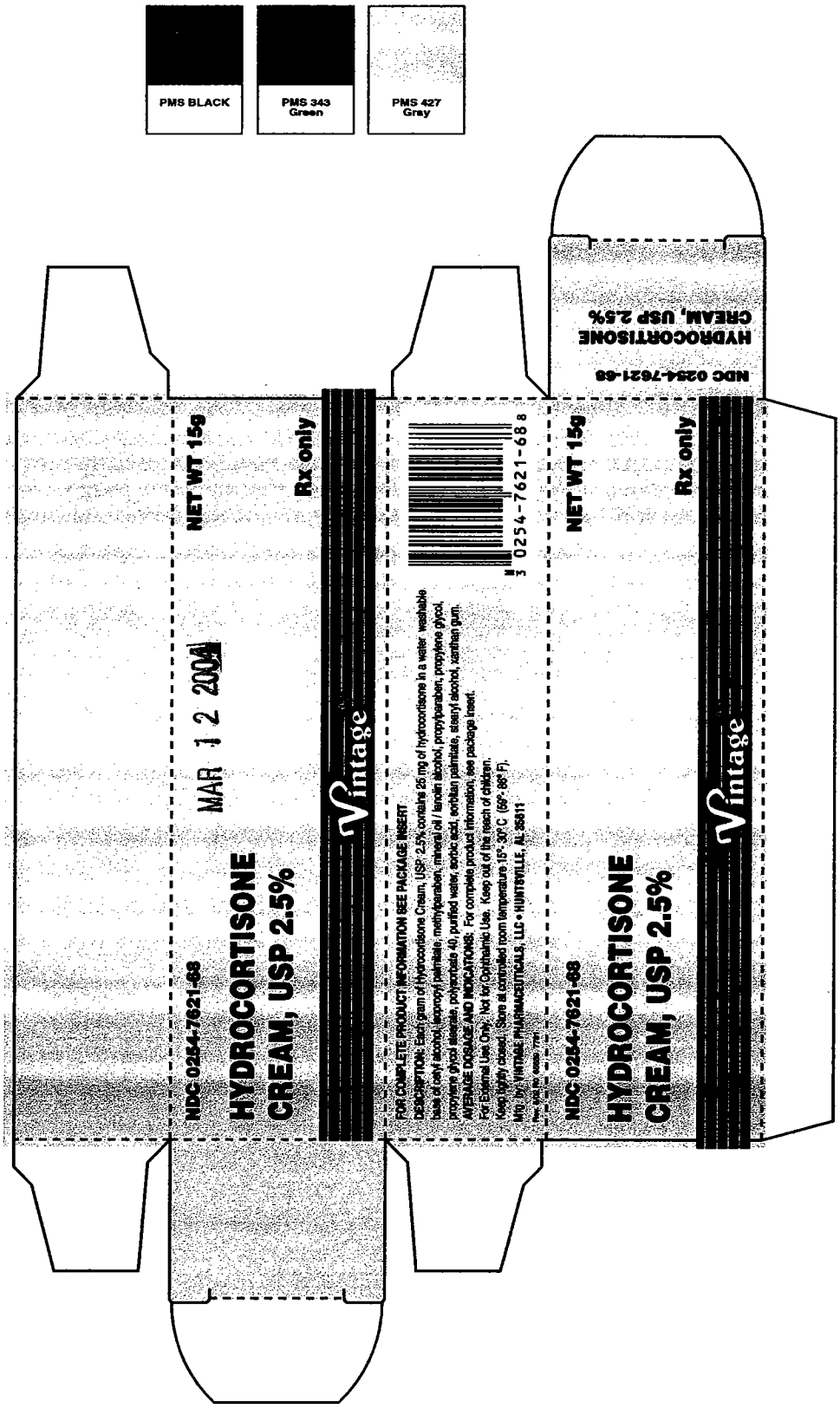
Keep tightly closed. Store at controlled room temperature 15°- 30° C (59°- 86° F).

Mfg. by:
VINTAGE PHARMACEUTICALS, LLC
HUNTSVILLE, AL 35811
Rev. 5/02 R0
65860 7781

3 0254-7621-68 8

PMS BLACK	PMS 343 Green	PMS 427 Gray

40-503



000044

40-503

NDC 0254-7621-72 MAR 12 2004 NET WT 30g

HYDROCORTISONE CREAM, USP 2.5%

APPROVAL

Rx only

Vintage®

FOR COMPLETE PRODUCT INFORMATION SEE PACKAGE INSERT

DESCRIPTION: Each gram of Hydrocortisone Cream, USP 2.5% contains 25 mg of hydrocortisone in a water washable base of cetyl alcohol, isopropyl palmitate, methylparaben, mineral oil / lanolin alcohol, propylparaben, propylene glycol, propylene glycol stearate, polysorbate 40, purified water, sorbic acid, sorbitan palmitate, stearyl alcohol, xanthan gum.

AVERAGE DOSAGE AND INDICATIONS: For complete product information, see package insert.

For External Use Only. Not for Ophthalmic Use. Keep out of the reach of children.

Keep tightly closed. Store at controlled room temperature 15°-30° C (59°-86° F).

Mfg. by:
VINTAGE PHARMACEUTICALS, LLC
HUNTSVILLE, AL 35811
Rev. 5/02 R0
65662 7781

3 0254-7621-72 5

PMS BLACK	PMS 343 Green	PMS 427 Gray

40-503

30 g LABEL
ENLARGED TO 130%
BY FOIA STAFF.

NDC 0254-7621-72 MAR 12 2004 NET WT 30g

HYDROCORTISONE CREAM, USP 2.5%

APPROVAL

Rx only

Vintage®

FOR COMPLETE PRODUCT INFORMATION SEE PACKAGE INSERT

DESCRIPTION: Each gram of Hydrocortisone Cream, USP 2.5% contains 25 mg of hydrocortisone in a water washable base of cetyl alcohol, isopropyl palmitate, methylparaben, mineral oil / lanolin alcohol, propylparaben, propylene glycol, propylene glycol stearate, polysorbate 40, purified water, sorbic acid, sorbitan palmitate, stearyl alcohol, xanthan gum.

AVERAGE DOSAGE AND INDICATIONS: For complete product information, see package insert.

For External Use Only. Not for Ophthalmic Use. Keep out of the reach of children.

Keep tightly closed. Store at controlled room temperature 15°- 30° C (59°- 86° F).

Mfg. by:
VINTAGE PHARMACEUTICALS, LLC
HUNTSVILLE, AL 35811
Rev. 5/02 R0
65662 7781

N 3 0254-7621-72 5

PMS BLACK

PMS 343 Green

PMS 427 Gray

40-303

000070

40-503

NDC 0254-7621-76 MAR 12 2004 NET WT 60g

HYDROCORTISONE CREAM, USP 2.5%

APPROVAL

Rx only

Vintage®

FOR COMPLETE PRODUCT INFORMATION SEE PACKAGE INSERT

DESCRIPTION: Each gram of Hydrocortisone Cream, USP 2.5% contains 25 mg of hydrocortisone in a water washable base of cetyl alcohol, isopropyl palmitate, methylparaben, mineral oil / lanolin alcohol, propylparaben, propylene glycol, propylene glycol stearate, polysorbate 40, purified water, sorbic acid, sorbitan palmitate, stearyl alcohol, xanthan gum.

AVERAGE DOSAGE AND INDICATIONS: For complete product information, see package insert.

For External Use Only. Not for Ophthalmic Use. Keep out of the reach of children.

Keep tightly closed. Store at controlled room temperature 15°- 30° C (59°- 86° F).

Mfg. by:
VINTAGE PHARMACEUTICALS, LLC
HUNTSVILLE, AL 35811
Rev. 5/02 R0
65664 7781

N 3 0254-7621-76 3

PMS BLACK	PMS 343 Green	PMS 427 Gray

40-303

000092

NDC 0254-7621-84

HYDROCORTISONE CREAM, USP 2.5%

Rx only

NET WT 200g

Vintage®

FOR COMPLETE PRODUCT INFORMATION SEE PACKAGE INSERT

DESCRIPTION: Each gram of Hydrocortisone Cream, USP 2.5% contains 25 mg of hydrocortisone in a water washable base of cetyl alcohol, isopropyl palmitate, methylparaben, mineral oil / lanolin alcohol, propylparaben, propylene glycol, propylene glycol stearate, polysorbate 40, purified water, sorbic acid, sorbitan palmitate, stearyl alcohol, xanthan gum.

AVERAGE DOSAGE AND INDICATIONS:
For complete product information, see package insert.
For External Use Only. Not for Ophthalmic Use. Keep out of the reach of children.

Keep tightly closed. Store at controlled room temperature 15°-30° C (59°- 86° F).

Mfg. by:
VINTAGE PHARMACEUTICALS, LLC
HUNTSVILLE, AL 35811
Rev. 0502 R0 0505 7781

N 0254-7621-84 8

PMS BLACK

PMS 343 Green

PMS 427 Gray

000104

NDC 0254-7621-91

HYDROCORTISONE CREAM, USP 2.5%

Rx only

NET WT 454g

Vintage®

FOR COMPLETE PRODUCT INFORMATION SEE PACKAGE INSERT

DESCRIPTION: Each gram of Hydrocortisone Cream, USP 2.5% contains 25 mg of hydrocortisone in a water washable base of cetyl alcohol, isopropyl palmitate, methylparaben, mineral oil / lanolin alcohol, propylparaben, propylene glycol, propylene glycol stearate, polysorbate 40, purified water, sorbic acid, sorbitan palmitate, stearyl alcohol, xanthan gum.

AVERAGE DOSAGE AND INDICATIONS:
For complete product information, see package insert.
For External Use Only. Not for Ophthalmic Use. Keep out of the reach of children.

Keep tightly closed. Store at controlled room temperature 15°- 30° C (59°- 86° F).

Mfg. by:
VINTAGE PHARMACEUTICALS, LLC
HUNTSVILLE, AL 35811
Rev. 0402 70 60888 7731

N 3 0254-7621-916

PMS BLACK	PMS 343 Green	PMS 427 Gray

000120

40-503

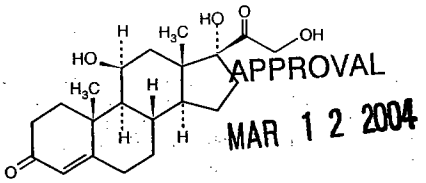
HYDROCORTISONE CREAM, USP 2.5%

Rx only

DESCRIPTION

Each gram of Hydrocortisone Cream, USP 2.5% contains 25 mg of hydrocortisone in a water-washable base of cetyl alcohol, isopropyl palmitate, methylparaben, mineral oil/lanolin alcohol, propylparaben, propylene glycol, propylene glycol stearate, polysorbate 40, purified water, sorbic acid, sorbitan palmitate, stearyl alcohol and xanthan gum.

Chemically, hydrocortisone is [Pregn-4-ene-3,20-dione, 11,17, 21-trihydroxy-, (11β)-] with the molecular formula ($C_{21}H_{30}O_5$) and is represented by the following structural formula:



Its molecular weight is 362.47 and its CAS Registry Number is 50-23-7. The topical corticosteroids, including hydrocortisone, constitute a class of primarily synthetic steroids used as anti-inflammatory and antipruritic agents.

CLINICAL PHARMACOLOGY

Topical corticosteroids share anti-inflammatory, antipruritic, and vasoconstrictive actions. The mechanism of anti-inflammatory activity of the topical corticosteroids is unclear. Various laboratory methods, including vasoconstrictor assays, are used to compare and predict potencies and/or clinical efficacies of the topical corticosteroids. There is some evidence to suggest that a recognizable correlation exists between vasoconstrictor potency and therapeutic efficacy in man.

Pharmacokinetics

The extent of percutaneous absorption of topical corticosteroids is determined by many factors including the vehicle, the integrity of the epidermal barrier, and the use of occlusive dressings.

Topical corticosteroids can be absorbed from normal intact skin. Inflammation and/or other disease processes in the skin increase percutaneous absorption. Occlusive dressings substantially increase the percutaneous absorption of topical corticosteroids. Thus, occlusive dressings may be a valuable therapeutic adjunct for treatment of resistant dermatoses. (See **DOSAGE AND ADMINISTRATION.**)

Once absorbed through the skin, topical corticosteroids are handled through pharmacokinetic pathways similar to systemically administered corticosteroids. Corticosteroids are bound to plasma proteins in varying degrees. Corticosteroids are metabolized primarily in the liver and are then excreted by the kidneys. Some of the topical corticosteroids and their metabolites are also excreted into the bile.

INDICATIONS AND USAGE

Topical corticosteroids are indicated for the relief of the inflammatory and pruritic manifestations of corticosteroid-responsive dermatoses.

CONTRAINDICATIONS

Topical corticosteroids are contraindicated in those patients with a history of hypersensitivity to any of the components of the preparation.

PRECAUTIONS

General

Systemic absorption of topical corticosteroids has produced reversible hypothalamic-pituitary-adrenal (HPA) axis suppression, manifestations of Cushing's syndrome, hyperglycemia, and glucosuria in some patients.

Conditions which augment systemic absorption include the application of the more potent steroids, use over large surface areas, prolonged use, and the addition of occlusive dressings.

Therefore, patients receiving a large dose of a potent topical steroid applied to a large surface area or under an occlusive dressing should be evaluated periodically for evidence of HPA axis suppression by using the urinary free cortisol and ACTH stimulation tests. If HPA axis suppression is noted, an attempt should be made to withdraw the drug, to reduce the frequency of application, or to substitute a less potent steroid.

Recovery of HPA axis function is generally prompt and complete upon discontinuation of the drug. Infrequently, signs and symptoms of steroid withdrawal may occur, requiring supplemental systemic corticosteroids.

Children may absorb proportionally larger amounts of topical corticosteroids and thus be more susceptible to systemic toxicity (See **PRECAUTIONS: Pediatric Use**).

If irritation develops, topical corticosteroids should be discontinued and appropriate therapy instituted.

In the presence of dermatological infections, the use of an appropriate antifungal or antibacterial agent should be instituted. If a favorable response does not occur promptly, the corticosteroid should be discontinued until the infection has been adequately controlled.

Information for the Patient

Patients using topical corticosteroids should receive the following information and instructions:

1. This medication is to be used as directed by the physician. It is for external use only. Avoid contact with the eyes.
2. Patients should be advised not to use this medication for any disorder other than for which it was prescribed.
3. The treated skin area should not be bandaged or otherwise covered or wrapped as to be occlusive unless directed by the physician.
4. Patients should report any signs of local adverse reactions, especially under occlusive dressing.
5. Parents of pediatric patients should be advised not to use tight-fitting diapers or plastic pants on a child being treated in the diaper area, as these garments may constitute occlusive dressings.

Laboratory Tests
The following tests may be helpful in evaluating the HPA axis suppression:

Urinary free cortisol test
ACTH stimulation test

Carcinogenesis, Mutagenesis and Impairment of Fertility
Long-term animal studies have not been performed to evaluate the carcinogenic potential or the effect on fertility of topical corticosteroids.

Studies to determine mutagenicity with prednisolone and hydrocortisone have revealed negative results.

Pregnancy
Teratogenic effects: Pregnancy Category C: Corticosteroids are generally teratogenic in laboratory animals when administered systemically at relatively low dosage levels. The more potent 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 topically applied corticosteroids. Therefore, topical corticosteroids should be used during pregnancy only if the potential benefit justifies the potential risk to the fetus. Drugs of this class should not be used extensively on pregnant patients, in large amounts, or for prolonged periods of time.

Nursing Mothers
It is not known whether topical administration of corticosteroids could result in sufficient systemic absorption to produce detectable quantities in breast milk. Systemically administered corticosteroids are secreted into breast milk in quantities *not* likely to have a deleterious effect on the infant. Nevertheless, caution should be exercised when topical corticosteroids are administered to a nursing woman.

Pediatric Use
Pediatric patients may demonstrate greater susceptibility to topical corticosteroid-induced HPA axis suppression and Cushing's syndrome than mature patients because of a larger skin surface area to body weight ratio.

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

Administration of topical corticosteroids to pediatric patients should be limited to the least amount compatible with an effective therapeutic regimen. Chronic corticosteroid therapy may interfere with the growth and development of pediatric patients.

ADVERSE REACTIONS
The following local adverse reactions are reported infrequently with topical corticosteroids, but may occur more frequently with the use of occlusive dressings. These reactions are listed in an approximate decreasing order of occurrence: burning, itching, irritation, dryness, folliculitis, hypertrichosis, acneiform eruptions, hypopigmentation, perioral dermatitis, allergic contact dermatitis, maceration of the skin, secondary infection, skin atrophy, striae, and miliaria.

OVERDOSAGE
Topically applied corticosteroids can be absorbed in sufficient amounts to produce systemic effects (See **PRECAUTIONS**).

DOSAGE AND ADMINISTRATION
Topical corticosteroids are generally applied to the affected area as a thin film from two to four times daily depending on the severity of the condition. Occlusive dressings may be used for the management of psoriasis or recalcitrant conditions.

If an infection develops, the use of occlusive dressings should be discontinued and appropriate antimicrobial therapy instituted.

HOW SUPPLIED:
In tubes of 15 g, 30 g, 60 g and in jars of 200 g, 454 g.
Store at controlled room temperature 15°- 30°C (59°- 86°F).

Keep out of the reach of children.

Manufactured by:
VINTAGE PHARMACEUTICALS, LLC
Huntsville, AL 35811

65667
Rev 5/02
R0

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

ANDA 40-503

LABELING REVIEW(S)

1.1

APPROVAL SUMMARY

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

ANDA Number: 40-503

Date of Submission: July 02, 2002

Applicant's Name: Vintage Pharmaceutical Inc.

Established Name: Hydrocortisone Cream USP, 2.5%

APPROVAL SUMMARY (List the package size, strength(s), and date of submission for approval):

- Do you have 12 Final Printed Labels and Labeling? Yes
- Container Labels: (Tubes of 15 g, 30 g, and 60 g; Jars of 200 g, and 454 g)– Satisfactory in FPL as of July 02, 2002, submission [Vol. 1.1, revised 5/02; code # 65660 (15 g); code # 65662 (30 g); code # 65664 (60 g); code # 65665 (200 g; code # 65666 (454 g)]
- Carton Labeling: (15 g, 30 g, and 60 g) – Satisfactory in FPL as of July 02, 2002, submission. [Vol. 1.1, revised 5/02; code # 65659 (15 g); code # 65661 (30 g); code # 65663 (60 g)]
- Professional Package Insert Labeling: Satisfactory in FPL as of July 02, 2002, submission. [Vol. 1.1 revised 5/02; code # 65667]

BASIS OF APPROVAL:

- Was this approval based upon a petition? No
- What is the RLD on the 356(h) form: Hytone Cream 2.5%
- NDA Number: 80-472
- NDA Drug Name: Hydrocortisone cream USP, 2.5%
- NDA Firm: Dermik Laboratories, Inc.
- Date of Approval of NDA Insert: September 25, 1972
- 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
- Revisions needed post-approval: No
- Patents/Exclusivities: Refer to chart below.

Patent Data – NDA 80-472

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

Exclusivity-Data – NDA 80-472

Code	Reference	Expiration	Labeling Impact
	There is no unexpired exclusivity for this product.		NONE

REVIEW OF PROFESSIONAL LABELING CHECK LIST

Established Name	Yes	No	N.A.
Different name than on acceptance to file letter?		X	
Is this product a USP item? If so, USP supplement in which verification was assured. USP 23	X		
Is this name different than that used in the Orange Book?		X	
If not USP, has the product name been proposed in the PF?			X
Error Prevention Analysis			
Has the firm proposed a proprietary name? If yes, complete this subsection.		X	
Do you find the name objectionable? List reasons in FTR, if so. Consider: Misleading? Sounds or looks like another name? USAN stem present? Prefix or Suffix present?			X
Has the name been forwarded to the Labeling and Nomenclature Committee? If so, what were the recommendations? If the name was unacceptable, has the firm been notified?			X
Packaging			
Is this a new packaging configuration, never been approved by an ANDA or NDA? If yes, describe in FTR.		X	
Is this package size mismatched with the recommended dosage? If yes, the Poison Prevention Act may require a CRC.		X	
Does the package proposed have any safety and/or regulatory concerns?		X	
If IV product packaged in syringe, could there be adverse patient outcome if given by direct IV injection?			X
Conflict between the DOSAGE AND ADMINISTRATION and INDICATIONS sections and the packaging configuration?		X	
Is the strength and/or concentration of the product unsupported by the insert labeling?		X	
Is the color of the container (i.e. the color of the cap of a mydriatic ophthalmic) or cap incorrect?			X
Individual cartons required? Issues for FTR: Innovator individually cartoned? Light sensitive product which might require cartoning? Must the package insert accompany the product?		X	
Are there any other safety concerns?		X	
Labeling			
Is the name of the drug unclear in print or lacking in prominence? (Name should be the most prominent information on the label).		X	
Has applicant failed to clearly differentiate multiple product strengths?		X	
Is the corporate logo larger than 1/3 container label? (No regulation - see ASHP guidelines)		X	
Labeling(continued)	Yes	No	N.A.
Does RLD make special differentiation for this label? (i.e., Pediatric strength vs Adult; Oral Solution vs Concentrate, Warning Statements that might be in red for the NDA)		X	
Is the Manufactured by/Distributor statement incorrect or falsely inconsistent between labels and labeling? Is "Jointly Manufactured by...", statement needed?		X	

Failure to describe solid oral dosage form identifying markings in HOW SUPPLIED?			X
Has the firm failed to adequately support compatibility or stability claims which appear in the insert labeling? Note: Chemist should confirm the data has been adequately supported.		X	
Scoring: Describe scoring configuration of RLD and applicant (page #) in the FTR			
Is the scoring configuration different than the RLD?			X
Has the firm failed to describe the scoring in the HOW SUPPLIED section?			X
Inactive Ingredients: (FTR: List page # in application where inactives are listed)			
Does the product contain alcohol? If so, has the accuracy of the statement been confirmed?	X		
Do any of the inactives differ in concentration for this route of administration?		X	
Any adverse effects anticipated from inactives (i.e., benzyl alcohol in neonates)?		X	
Is there a discrepancy in inactives between DESCRIPTION and the composition statement?		X	
Has the term "other ingredients" been used to protect a trade secret? If so, is claim supported?		X	
Failure to list the coloring agents if the composition statement lists e.g., Opacode, Opaspray?			X
Failure to list gelatin, coloring agents, antimicrobials for capsules in DESCRIPTION?			X
Failure to list dyes in imprinting inks? (Coloring agents e.g., iron oxides need not be listed)			X
USP Issues: (FTR: List USP/NDA/ANDA dispensing/storage recommendations)			
Do container recommendations fail to meet or exceed USP/NDA recommendations? If so, are the recommendations supported and is the difference acceptable?		X	
Does USP have labeling recommendations? If any, does ANDA meet them?	X		
Is the product light sensitive? If so, is NDA and/or ANDA in a light resistant container?		X	
Failure of DESCRIPTION to meet USP Description and Solubility information? If so, USP information should be used. However, only include solvents appearing in innovator labeling.		X	
Bioequivalence Issues: (Compare bioequivalency values: insert to study. List Cmax, Tmax, T 1/2 and date study acceptable)			
Insert labeling references a food effect or a no-effect? If so, was a food study done?			X
Has CLINICAL PHARMACOLOGY been modified? If so, briefly detail where/why.		X	
Patent/Exclusivity Issues?: FTR: Check the Orange Book edition or cumulative supplement for verification of the latest Patent or Exclusivity. List expiration date for all patents, exclusivities, etc. or if none, please state.		X	

FOR THE RECORD:

1. **MODELING LABEL**

   Labeling review based on the labeling for Hytone cream, 2.5% (NDA 80-472) by Dermik Laboratories, Inc.; approved November 25, 1972; revised 12/96 - PDR). There has been no labeling supplements approved for this NDA.

2. **INACTIVE INGREDIENTS**

There are no discrepancies between the listing of inactives in the product labeling and in the C&C statements. Please note that the labels and labeling list the inactive ingredient [redacted] as "Propylene Glycol Sterate" because the specifications stated in the Mongraph for [redacted] not met. ANDA 40-503 Certificate of Analyses for [redacted] and the USP monograph states that to be listed as [redacted] there should be no less than [redacted] Therefore, Propylene Glycol Stearate is acceptable.
[Vol. B1.1 pg.139 and Vol. A1.2 pg. 175]

3. **STORAGE TEMPERATURE RECOMMENDATIONS COMPARSON**

- USP - Preserve in tights containers.
- RLD – Store at room temperature.
- ANDA – Store at controlled room temperature 15°-30°C (59°-86°F).

4. **PACKAGING CONFIGURATION**

- RLD - packages its cream in 15 g and 30 g tubes and 4 oz jar (120 g)
- ANDA – packages its cream in 15 g, 30 g, and 60 g in white, aluminum tubes and 200 g and 454 g in white HDPE jars with a white plastic cap.

5. **FINISHED DOSAGE FORM**

- RLD: Cream
- ANDA: White to off white cream

[Vol. A1.2 pg. 461]

6. **MANUFACTURING FACILITY OF FINISHED DOSAGE FORM**

Vintage Pharmaceuticals, Inc.
120 Vintage Drive
Huntsville, AL 35811
[Vol. A1.2 pg. 223]

Date of Review: **Date of Submission:**

Primary Reviewer: Beverly Weitzman B. Weitzman **Date:** 12/4/02

Team Leader: John J. Grace **Date:** 12/13/2002

---

cc:

ANDA: 40-503
DUP/DIVISION FILE
HFD-613/JGrace (no cc)
V:\FIRMSNZ\Vintage\LTRS&REV\40503ap.l

APPROVAL SUMMARY

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

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APPROVAL SUMMARY (List the package size, strength(s), and date of submission for approval):

- Do you have 12 Final Printed Labels and Labeling? Yes
- Container Labels: (Tubes of 15 g, 30 g, and 60 g; Jars of 200 g, and 454 g)– Satisfactory in FPL as of July 02, 2002, submission [Vol. 1.1, revised 5/02; code # 65660 (15 g); code # 65662 (30 g); code # 65664 (60 g); code # 65665 (200 g; code # 65666 (454 g)]
- Carton Labeling: (15 g, 30 g, and 60 g) – Satisfactory in FPL as of July 02, 2002, submission. [Vol. 1.1, revised 5/02; code # 65659 (15 g); code # 65661 (30 g); code # 65663 (60 g)]
- Professional Package Insert Labeling: Satisfactory in FPL as of July 02, 2002, submission. [Vol. 1.1 revised 5/02; code # 65667]

BASIS OF APPROVAL:

- Was this approval based upon a petition? No
- What is the RLD on the 356(h) form: Hytone Cream 2.5%
- NDA Number: 80-472
- NDA Drug Name: Hydrocortisone cream USP, 2.5%
- NDA Firm: Dermik Laboratories, Inc.
- Date of Approval of NDA Insert: September 25, 1972
- 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
- Revisions needed post-approval: No
- Patents/Exclusivities: Refer to chart below.

Patent Data – NDA 80-472

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

Exclusivity-Data – NDA 80-472

Code	Reference	Expiration	Labeling Impact
	There is no unexpired exclusivity for this product.		NONE

REVIEW OF PROFESSIONAL LABELING CHECK LIST

Established Name	Yes	No	N.A.
Different name than on acceptance to file letter?		X	
Is this product a USP item? If so, USP supplement in which verification was assured. USP 23	X		
Is this name different than that used in the Orange Book?		X	
If not USP, has the product name been proposed in the PF?			X
Error Prevention Analysis			
Has the firm proposed a proprietary name? If yes, complete this subsection.		X	
Do you find the name objectionable? List reasons in FTR, if so. Consider: Misleading? Sounds or looks like another name? USAN stem present? Prefix or Suffix present?			X
Has the name been forwarded to the Labeling and Nomenclature Committee? If so, what were the recommendations? If the name was unacceptable, has the firm been notified?			X
Packaging			
Is this a new packaging configuration, never been approved by an ANDA or NDA? If yes, describe in FTR.		X	
Is this package size mismatched with the recommended dosage? If yes, the Poison Prevention Act may require a CRC.		X	
Does the package proposed have any safety and/or regulatory concerns?		X	
If IV product packaged in syringe, could there be adverse patient outcome if given by direct IV injection?			X
Conflict between the DOSAGE AND ADMINISTRATION and INDICATIONS sections and the packaging configuration?		X	
Is the strength and/or concentration of the product unsupported by the insert labeling?		X	
Is the color of the container (i.e. the color of the cap of a mydriatic ophthalmic) or cap incorrect?			X
Individual cartons required? Issues for FTR: Innovator individually cartoned? Light sensitive product which might require cartoning? Must the package insert accompany the product?		X	
Are there any other safety concerns?		X	
Labeling			
Is the name of the drug unclear in print or lacking in prominence? (Name should be the most prominent information on the label).		X	
Has applicant failed to clearly differentiate multiple product strengths?		X	
Is the corporate logo larger than 1/3 container label? (No regulation - see ASHP guidelines)		X	
Labeling(continued)	Yes	No	N.A.
Does RLD make special differentiation for this label? (i.e., Pediatric strength vs Adult; Oral Solution vs Concentrate, Warning Statements that might be in red for the NDA)		X	
Is the Manufactured by/Distributor statement incorrect or falsely inconsistent between labels and labeling? Is "Jointly Manufactured by...", statement needed?		X	

Failure to describe solid oral dosage form identifying markings in HOW SUPPLIED?			X
Has the firm failed to adequately support compatibility or stability claims which appear in the insert labeling? Note: Chemist should confirm the data has been adequately supported.		X	
Scoring: Describe scoring configuration of RLD and applicant (page #) in the FTR			
Is the scoring configuration different than the RLD?			X
Has the firm failed to describe the scoring in the HOW SUPPLIED section?			X
Inactive Ingredients: (FTR: List page # in application where inactives are listed)			
Does the product contain alcohol? If so, has the accuracy of the statement been confirmed?	X		
Do any of the inactives differ in concentration for this route of administration?		X	
Any adverse effects anticipated from inactives (i.e., benzyl alcohol in neonates)?		X	
Is there a discrepancy in inactives between DESCRIPTION and the composition statement?		X	
Has the term "other ingredients" been used to protect a trade secret? If so, is claim supported?		X	
Failure to list the coloring agents if the composition statement lists e.g., Opacode, Opaspray?			X
Failure to list gelatin, coloring agents, antimicrobials for capsules in DESCRIPTION?			X
Failure to list dyes in imprinting inks? (Coloring agents e.g., iron oxides need not be listed)			X
USP Issues: (FTR: List USP/NDA/ANDA dispensing/storage recommendations)			
Do container recommendations fail to meet or exceed USP/NDA recommendations? If so, are the recommendations supported and is the difference acceptable?		X	
Does USP have labeling recommendations? If any, does ANDA meet them?	X		
Is the product light sensitive? If so, is NDA and/or ANDA in a light resistant container?		X	
Failure of DESCRIPTION to meet USP Description and Solubility information? If so, USP information should be used. However, only include solvents appearing in innovator labeling.		X	
Bioequivalence Issues: (Compare bioequivalency values: insert to study. List Cmax, Tmax, T 1/2 and date study acceptable)			
Insert labeling references a food effect or a no-effect? If so, was a food study done?			X
Has CLINICAL PHARMACOLOGY been modified? If so, briefly detail where/why.		X	
Patent/Exclusivity Issues?: FTR: Check the Orange Book edition or cumulative supplement for verification of the latest Patent or Exclusivity. List expiration date for all patents, exclusivities, etc. or if none, please state.		X	

FOR THE RECORD:

1. **MODELING LABEL**

   Labeling review based on the labeling for Hytone cream, 2.5% (NDA 80-472) by Dermik Laboratories, Inc.; approved November 25, 1972; revised 12/96 - PDR). There has been no labeling supplements approved for this NDA.

2. **INACTIVE INGREDIENTS**

There are no discrepancies between the listing of inactives in the product labeling and in the C&C statements. Please note that the labels and labeling list the inactive ingredient ' [redacted] as "Propylene Glycol Sterate" because the specifications stated in the Mongraph for [redacted] not met. ANDA 40-503 Certificate of Analyses for [redacted], and the USP monograph states that to be listed as [redacted] there should be no less than [redacted] Therefore, Propylene Glycol Stearate is acceptable.

[Vol. B1.1 pg.139 and Vol. A1.2 pg. 175]

3. **STORAGE TEMPERATURE RECOMMENDATIONS COMPARSON**

- USP - Preserve in tights containers.
- RLD – Store at room temperature.
- ANDA – Store at controlled room temperature 15°-30°C (59°-86°F).

4. **PACKAGING CONFIGURATION**

- RLD - packages its cream in 15 g and 30 g tubes and 4 oz jar (120 g)
- ANDA – packages its cream in 15 g, 30 g, and 60 g in white, aluminum tubes and 200 g and 454 g in white HDPE jars with a white plastic cap.

5. **FINISHED DOSAGE FORM**

- RLD: Cream
- ANDA: White to off white cream

[Vol. A1.2 pg. 461]

6. **MANUFACTURING FACILITY OF FINISHED DOSAGE FORM**

Vintage Pharmaceuticals, Inc.
120 Vintage Drive
Huntsville, AL 35811
[Vol. A1.2 pg. 223]

Date of Review: **Date of Submission:**

Primary Reviewer: Beverly Weitzman **Date:** 2/26/03

B. Weitzman

Team Leader: **Date:** 2/27/2003

---

cc:

ANDA: 40-503
DUP/DIVISION FILE
HFD-613/JGrace (no cc)
V:\FIRMSNZ\Vintage\LTRS&REV\40503ap.l

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

ANDA 40-503

CHEMISTRY REVIEW(S)

ANDA 40-503

Hydrocortisone Cream USP, 2.5%

Vintage Pharmaceuticals, LLC

Nashed E. Nashed, Ph.D.

Chemistry Division 1

Table of Contents

APPEARS THIS WAY
ON ORIGINAL

Chemistry Review Data Sheet

1. ANDA 40-503

2. REVIEW #: 1

3. REVIEW DATE: 9/20/02

4. REVIEWER: Nashed E. Nashed, Ph.D.

5. PREVIOUS DOCUMENTS:

Previous Documents	Document Date
N/A	N/A

6. SUBMISSION(S) BEING REVIEWED:

Submission(s) Reviewed	Document Date
Original	7/2/02

7. NAME & ADDRESS OF APPLICANT:

Name: Vintage Pharmaceuticals, LLC

Address: 120 Vintage Drive, Huntsville, AL 35811

Representative: Christopher J. Nascone

Telephone: 256-859-2222

8. DRUG PRODUCT NAME/CODE/TYPE:

a) Proprietary Name: N/A
b) Non-Proprietary Name (USAN): Hydrocortisone

9. LEGAL BASIS FOR SUBMISSION:

The firm certifies that to the best of their knowledge, any patent claiming Hydrocortisone Cream, USP 2.5% either has not been filed, or has expired prior to the filing of this application.
The firm indicated that to the best of their knowledge, FDA has not granted marketing exclusivity, to any product with the same active ingredients as the product submitted in this application.
The reference listed drug is Hytone manufactured by Dermik Labs NDA 40-472

10. PHARMACOL. CATEGORY: Anti-inflammatory

11. DOSAGE FORM: Cream

12. STRENGTH/POTENCY: 2.5%

13. ROUTE OF ADMINISTRATION: Topical

14. Rx/OTC DISPENSED: _X__Rx ___OTC

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

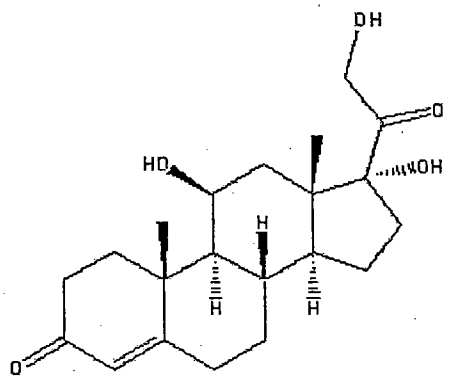
_____SPOTS product – Form Completed

__X___Not a SPOTS product

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

[Pregn-4-ene-3,20-dione, 11,17,21-trihydroxy-, (11β)-]

$C_{21}H_{30}O_5$ M.W. 362.47



APPEARS THIS WAY
ON ORIGINAL

17. RELATED/SUPPORTING DOCUMENTS:

A. DMFs:

DMF #	TYPE	HOLDER	ITEM REFERENCED	CODE[1]	STATUS[2]	DATE REVIEW COMPLETED	COMMENTS
	II			3	Defi.	8/23/02	Kathy Woodland
	III			4			
	III			4			
	III			4			
	III			4			
	III			4			
	III			4			
	III			4			
	III			4			
	III			4			
	III			4			
	III			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)

B. Other Documents: N/A

DOCUMENT	APPLICATION NUMBER	DESCRIPTION

18. STATUS:

CONSULTS/ CMC RELATED REVIEWS	RECOMMENDATION	DATE	REVIEWER
Microbiology	N/A		
EES	Acceptable	9/10/02	
Methods Validation	The drug substance and the drug product are compendial		
Labeling	Pending		
Bioequivalence	Pending		
EA	Acceptable		
Radiopharmaceutical	N/A		

19. ORDER OF REVIEW

The application submission(s) covered by this review was taken in the date order of receipt. __x__ Yes _____ No If no, explain reason(s) below:

APPEARS THIS WAY
ON ORIGINAL

CHEMISTRY REVIEW #1

Redacted 14

Page(s) of trade secret and /or confidential commercial information

CC: ANDA 40-503
ANDA DUP 40-503
DIV FILE
Filed Copy

Endorsements (Draft and Final with Dates):

HFD-627/Nashed Nashed, Ph.D./ NN 11/15/02
HFD-627/James Fan, Team Leader/ 11/16/02
HFD-617/Sarah Ho, Project Manager/11/13/02 SH 11/21/02

V:\FIRMSNZ\VINTAGE\LTRS&REV\40-503.1.doc
F/T by:ard/11/15/02

TYPE OF LETTER: NOT APPROVABLE - MINOR

11/27/02

APPEARS THIS WAY
ON ORIGINAL

ANDA 40-503

Hydrocortisone Cream USP, 2.5%

Vintage Pharmaceuticals, LLC

Nashed E. Nashed, Ph.D.

Chemistry Division 1

Table of Contents

Chemistry Review Data Sheet

1. ANDA 40-503

2. REVIEW #: 2

3. REVIEW DATE: 2/11/04
   Revised: 3/2/04
   Revised: 3/5/04

4. REVIEWER: Nashed E. Nashed, Ph.D.

5. PREVIOUS DOCUMENTS:

Previous Documents	Document Date
N/A	N/A

6. SUBMISSION(S) BEING REVIEWED:

Submission(s) Reviewed	Document Date
Original	7/2/02
Minor Amendment	7/29/03
Fax Amendment	1/13/04

7. NAME & ADDRESS OF APPLICANT:

Name: Vintage Pharmaceuticals, LLC

Address: 120 Vintage Drive, Huntsville, AL 35811

Representative: Christopher J. Nascone

Telephone: 256-859-2222

8. DRUG PRODUCT NAME/CODE/TYPE:

a) Proprietary Name: N/A
b) Non-Proprietary Name (USAN): Hydrocortisone

9. LEGAL BASIS FOR SUBMISSION:

The firm certifies that to the best of their knowledge, any patent claiming Hydrocortisone Cream, USP 2.5% either has not been filed, or has expired prior to the filing of this application.
The firm indicated that to the best of their knowledge, FDA has not granted marketing exclusivity, to any product with the same active ingredients as the product submitted in this application.
The reference listed drug is Hytone manufactured by Dermik Labs NDA 80-472

10. PHARMACOL. CATEGORY: Anti-inflammatory

11. DOSAGE FORM: Cream

12. STRENGTH/POTENCY: 2.5%

13. ROUTE OF ADMINISTRATION: Topical

14. Rx/OTC DISPENSED: _X__Rx ___OTC

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

_____SPOTS product – Form Completed

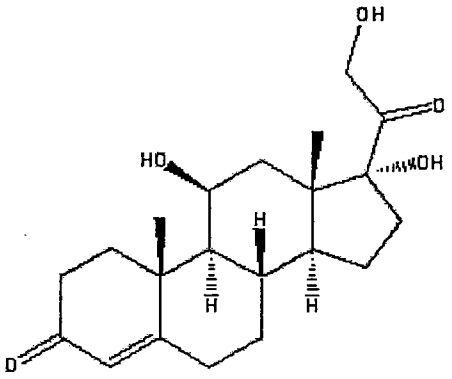
__X___Not a SPOTS product

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

[Pregn-4-ene-3,20-dione, 11,17,21-trihydroxy-, (11β)-]

$C_{21}H_{30}O_5$ M.W. 362.47

APPEARS THIS WAY ON ORIGINAL



17. RELATED/SUPPORTING DOCUMENTS:

A. DMFs:

DMF #	TYPE	HOLDER	ITEM REFERENCED	CODE[1]	STATUS[2]	DATE REVIEW COMPLETED	COMMENTS
	II			1	Adequate	2/10/04	N.Nashed
	III			4			
	III			4			
	III			4			
	III			4			
	III			4			
	III			4			
	III			4			
	III			4			
	III			4			
	III			4			
	III			4			
	III			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)

B. Other Documents: N/A

DOCUMENT	APPLICATION NUMBER	DESCRIPTION

18. STATUS:

CONSULTS/ CMC RELATED REVIEWS	RECOMMENDATION	DATE	REVIEWER
Microbiology	N/A		
EES	Acceptable	9/10/02	
Methods Validation	The drug substance and the drug product are compendial		
Labeling	Satisfactory	2/27/03	B. Weitzman
Bioequivalence	Satisfactory	12/17/02	M.S.Gokhale
EA	Acceptable		
Radiopharmaceutical	N/A		

19. ORDER OF REVIEW

The application submission(s) covered by this review was taken in the date order of receipt. ____ Yes __xx__ No If no, explain reason(s) below:

The application is Minor

Redacted 17 CHEMISTRY REVIEW #2

Page(s) of trade secret and /or confidential commercial information

CC: ANDA 40-503
ANDA DUP 40-503
Division File
Filed Copy

Endorsements:

HFD-627/N. Nashed/3/2/04 NN 3/5/04
HFD-627/J.Fan/3/3/04 3/5/04
HFD-617/A.Vu
F/T:ard/3/4/04 3/6/04

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APPEARS THIS WAY
ON ORIGINAL

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

ANDA 40-503

BIOEQUIVALENCE REVIEW(S)

OFFICE OF GENERIC DRUGS
DIVISION OF BIOEQUIVALENCE

ANDA # : 40-503 SPONSOR : Vintage Pharmaceuticals, LLC.

DRUG AND DOSAGE FORM : Hydrocortisone Cream, USP

STRENGTH(S) : 2.5%

TYPES OF STUDIES : SD SDF MULT [OTHER]

CLINICAL STUDY SITE(S) : N/A

ANALYTICAL SITE(S) : N/A

STUDY SUMMARY : N/A

DISSOLUTION : N/A

DSI INSPECTION STATUS

Inspection needed: YES / [NO]	Inspection status:	Inspection results:
First Generic ANDA	Inspection requested: (date)	
New facility ____	Inspection completed: (date)	
For cause ____		
Other ____		

PRIMARY REVIEWER : MAMATA S. GOKHALE, Ph.D. BRANCH : III

INITIAL : MSK DATE : 12/13/02

TEAM LEADER : GJP SINGH, Ph.D. BRANCH : III

INITIAL : GJPSingh DATE : 12-13-02

DIRECTOR, DIVISION OF BIOEQUIVALENCE : DALE P. CONNER, Pharm.D.

INITIAL : DPC DATE : 12/17/02

DEC 17 2002

Hydrocortisone Cream, USP
2.5%
ANDA #40-503
Reviewer: Mamata S. Gokhale
v:\firmsnz\vintage\ltrs&rev\40503W.702.doc

Vintage Pharmaceuticals, LLC.
120 Vintage Drive
Huntsville
AL 35811
Submission Date: July 2, 2002

Review of a Waiver Request

Background

1) The firm has submitted a request for the waiver of *in vivo* bioavailability/bioequivalance study requirements based on 21 CFR 320.22 for its proposed product, Hydrocortisone Cream, USP, 2.5%.

2) Hydrocortisone is a topical steroid indicated for the relief of inflammatory and pruritic manifestations of corticosteroid responsive dermatoses.

3) The reference listed drug is Hytone® (Hydrocortisone) Cream 2.5% (NDA #80-472), manufactured by Dermik Laboratories, Inc.

4) Hytone® (Hydrocortisone) Cream 2.5% is a pre-'62 drug product that is AT rated in the Orange Book. There is a DBE precedent for granting bio-waivers to hydrocortisone topical products based on the FDA's decision to exempt pre-1962 products which contain hydrocortisone from *in vivo* bioequivalence study requirements (See the DBE reviews of ANDA 40-414 and 40-351).

Formulation Comparison (Not To Be Released Under FOI)

Ingredient (mg/g)	[1]Reference listed product	Test product
[2]Hydrocortisone, USP	25.00	25.00
Lanolin Alcohol-Mineral Oil		
Isopropyl Palmitate, NF		
Polysorbate 40		
[3]Sorbiton Palmitate, NF		
Cetyl Alcohol		
Stearyl Alcohol, NF		
Propylene Glycol Stearate, NF		
Sorbic Acid		
Water, Purified, USP		
Propylene Glycol		
Xanthum Gum, NF		
Methyl Paraben, NF		
Propyl Paraben, NF		

[1]From COMIS database
[2]Active ingredient
All the inactive ingredients except Sorbitan Palmitate are within acceptable limits of the FDA Inactive Ingredient Guide, January 1996.
[3]Sorbitan Palmitate has been approved up to — mg/g in ANDA ——— by ——— USPD for Triamcinolone Acetonide Cream, 0.1%. This ANDA is withdrawn for marketing reasons. (See the comments by Regulatory Support in archival volume 1.1).

Comments

1) The test product contains the active ingredient in the same amount as the RLD.

2) The active ingredient, route of administration and the strength of the test product are the same as those of the RLD.

3) The proposed product is eligible for a waiver of *in vivo* bioequivalence study requirements under 21 CFR section 320.22 (c).

Recommendation

The Division of Bioequivalence agrees that the information submitted by Vintage Pharmaceuticals, LLC. demonstrates that Hydrocortisone Cream, USP, 2.5% falls under under 21 CFR section 320.22 (c) of the Bioavailability/Bioequivalence regulations. The waiver of *in vivo* bioequivalence study requirements for Hydrocortisone Cream, USP, 2.5%, is granted.

The firm should be informed of the above recommendation.

Mamata S. Gokhale, Ph.D.
Review Branch III
Division of Bioequivalence

Mamata Gokhale 12/13/02

RD INITIALED GJP Singh, Ph.D.
FT INITIALED GJP Singh

Concur: _____ Date 12-13-02
Dale P. Conner, Pharm.D.
Director
Division of Bioequivalence

Dale P. Conner 12/17/02

cc: ANDA #40-503 (original, duplicate), Gokhale, HFD-658, Drug File, Division File

CC: ANDA #40-503
ANDA DUPLICATE
DIVISION FILE
HFD-651/ Bio Drug File
HFD-658/ Reviewer: M. Gokhale

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Printed in final on 12/13/02

Endorsments: (Final with Dates)
HFD-658/ M. Gokhale MGK 12/13/02
HFD-658/ GJP. Singh GJPS 12-17-02
HFD-650/ D. Conner 12/17/02
HFD-617/ S. Mazzella

Bioequivalency- Acceptable

Submission Date: 2 July, 2002

1. Waiver (WAI)

Strengths: 2.5%
Outcome: AC

Outcome Decisions: AC- Acceptable
Winbio comments: Waiver is granted

APPEARS THIS WAY
ON ORIGINAL

BIOEQUIVALENCY COMMENTS TO BE PROVIDED TO THE APPLICANT

ANDA # 40-503 APPLICANT: Vintage Pharmaceuticals, LLC.

DRUG PRODUCT: Hydrocortisone Cream, USP
2.5%

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

Please note that the bioequivalency 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 bioequivalency information and/or studies, or may result in a conclusion that the proposed formulation is not approvable.

Sincerely yours,

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

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

ANDA 40-503

ADMINISTRATIVE DOCUMENTS

RECORD OF TELEPHONE CONVERSATION

James Fan called Mr. Christopher Nascone of Vintage Pharmaceuticals today asking Mr. Nascone to provide a revised DP COA to reflect the revised DP specs pertaining to their 7/29/03 amendment. He indicated that he has to check with his people if he can fax it to us today. If he cannot fax it to us to day, he will call me back. The telephone conversation was then concluded.

Mr. Nascone called back that they have already provided stability data up to — months from — months and show they meet specs. The firm indicated that the batch is an old batch and all the DP release tests except ————— , were done at stability. In consultation with the reviewer, Nashed Nashed, we decided that the firm does not need to provide an updated DP COA as requested earlier.

APPEARS THIS WAY
ON ORIGINAL

DATE: 3/1/04
ANDA NUMBER 40503
TELECON INITIATED BY AGENT OR SPONSOR; FDA
PRODUCT NAME: HYDROCORTISONE CREAM USP, 2.5%
FIRM NAME: VINTAGE
FIRM REPRESENTATIVES: Christopher Nascone
TELEPHONE NUMBER: 256-859-2222
FDA REPRESENTATIVES James Fan
SIGNATURES: 3/1/04

Orig: ANDA 40-503
Cc: Division File
Chem. I Telecon Binder
V:\firmsnz\vintage\telecons\40503.01mar2004

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

ANDA 40-503

CORRESPONDENCE

120 Vintage Drive
Huntsville, AL 35811

Vintage
Pharmaceuticals, LLC

Phone (256) 859-2222
Fax (256) 858-0025

January 13, 2004

ORIG AMENDMENT
N/AM

Mr. Gary Buehler, Director
Office of Generic Drugs, CDER, FDA
Document Control Room, Rm. 150
Metro Park North II
7500 Standish Place
Rockville, MD 20855-2773

RE: ANDA # 40-503
Hydrocortisone Cream, USP
2.5%
Fax Amendment

Dear Mr. Buehler:

In accordance with Section 505(j) of the FD&C Act, as amended, and 21 CFR Part 314.96, we are submitting an amendment to our Abbreviated New Drug Application for the above product.

This amendment is in response to a telephone request made on November 25, 2004 by Dr. Nashed of FDA. The amendment contains the results of the [redacted] Testing at [redacted] requested by Dr. Nashed during that telephone conference. The amendment also consists of results of testing performed at [redacted] the formulation. These passing results demonstrate that the [redacted].

The archival copy of the amendment consists of one volume. The review copy consists of one red-jacketed chemistry & manufacturing volume, and one separately bound, orange-jacketed bioequivalence volume.

We look forward to your early response. If you have any questions or comments regarding this submission, please contact the undersigned, or as an alternate, Mr. John Schultz, Plant Manager, at Tel. (256) 859-2222.

Sincerely,
VINTAGE PHARMACEUTICALS, LLC

CJ Nascone

Christopher J. Nascone
Regulatory Affairs

120 Vintage Drive
Huntsville, AL 35811

Vintage
Pharmaceuticals, LLC

Phone (256) 859-2222
Fax (256) 858-0025

July 29, 2003

ORIG AMENDMENT
N/AM

Mr. Gary Buehler, Director
Office of Generic Drugs, CDER, FDA
Document Control Room, Rm. 150
Metro Park North II
7500 Standish Place
Rockville, MD 20855-2773

RE: ANDA #40-503
Hydrocortisone Cream, USP 2.5%
Minor Amendment

In accordance with Section 505(j) of the FD&C Act, as amended, and 21 CFR Part 314.94, we are submitting a minor amendment to the ANDA for the above product in response to a minor amendment letter dated December 2, 2002. The following item is included immediately following the NDA form 356h:

- Field Copy Certification

The archival copy of the amendment consists of one volume. The review Copy consists of one red-jacketed chemistry & manufacturing volume and one separately bound, orange-jacketed bioequivalence volume.

We look forward to your early response. If you have any questions or comments regarding this amendment, please contact the undersigned, or as an alternate, Mr. John Schultz, Plant Manager, at Tel. (256) 859-2222.

Sincerely,
VINTAGE PHARMACEUTICALS, LLC

for
Christopher J. Nascone
Regulatory Affairs

RECEIVED
JUL 30 2003
OGD/CDER

8/1/03

MINOR AMENDMENT

ANDA 40-503

DEC -- 2 2002

OFFICE OF GENERIC DRUGS, CDER, FDA
Document Control Room, Metro Park North II
7500 Standish Place, Room 150
Rockville, MD 20855-2773 (301-594-0320)

TO: APPLICANT: Vintage Pharmaceuticals, LLC. TEL: 256-859-2222

ATTN: Christopher J. Nascone FAX: 256-858-0025

FROM: Sarah Ho PROJECT MANAGER: 301-827-5754

Dear Sir:

This facsimile is in reference to your abbreviated new drug application dated July 2, 2002, submitted pursuant to Section 505(j) of the Federal Food, Drug, and Cosmetic Act for Hydrocortisone Cream USP, 2.5%.

The application is deficient and, therefore, Not Approvable under Section 505 of the Act for the reasons provided in the attachments (2 pages). This facsimile is to be regarded as an official FDA communication and unless requested, a hard copy will not be mailed.

The file on this application is now closed. You are required to take an action described under 21 CFR 314.120 which will either amend or withdraw the application. 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. The designation as a MINOR AMENDMENT should appear prominently in your cover letter. You have been/will be notified in a separate communication from our Division of Bioequivalence of any deficiencies identified during our review of your bioequivalence data. If you have substantial disagreement with our reasons for not approving this application, you may request an opportunity for a hearing.

SPECIAL INSTRUCTIONS:
Chemistry comments provided.

Sr

Redacted 2 12/2/02 FDA FAX

Page(s) of trade secret and /or confidential commercial information

ANDA 40-503

AUG 29 2002

Vintage Pharmaceuticals, LLC.
Attention: Christopher J. Nascone
120 Vintage Drive
Huntsville, AL 35811

Dear Sir:

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

NAME OF DRUG: Hydrocortisone Cream USP, 2.5%

DATE OF APPLICATION: July 2, 2002

DATE (RECEIVED) ACCEPTABLE FOR FILING: July 5, 2002

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:

Sarah Ho
Project Manager
(301) 827-5848

Sincerely yours,

Gregory S. Davis for

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

ANDA 40-503
cc: DUP/Jacket
Division File
Field Copy
HFD-610/R.West
HFD-610/P.Rickman
HFD-92
HFD-615/M.Bennett
HFD-600/
Endorsement:
HFD-615/GDavis,Chief, RSB _____ date 29-Aug-2002
HFD-615/PPatel,CSO _____ date 8/29/02
Word Firmnz\Vintage\ltrs&rev\40503.ACK
F/T P.M.P 8/29/02
ANDA Acknowledgment Letter!