

CENTER FOR DRUG EVALUATION AND RESEARCH

Approval Package for:

APPLICATION NUMBER:

ANDA 207231

Name: Iloperidone (Tablet), 1MG, 2MG, 4MG, 6MG, 8MG
10MG, 12MG

Sponsor: Iventia

Approval Date: November 28, 2016

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

ANDA207231

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CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
ANDA 207231

APPROVAL LETTER



ANDA 207231

ANDA APPROVAL

SciRegs International, Inc.
U.S. Agent for Inventia Healthcare Private Limited
6333 Summercrest Drive
Columbia, MD 21045
Attention: C. Jeanne Taborsky
Regulatory Affairs Agent

Dear Madam:

This is in reference to your abbreviated new drug application (ANDA) submitted pursuant to section 505(j) of the Federal Food, Drug, and Cosmetic Act (FD&C Act) for Iloperidone Tablets, 1 mg, 2 mg, 4 mg, 6 mg, 8 mg, 10 mg, and 12 mg.

Reference is also made to the tentative approval letter issued by the Agency on June 27, 2016, and to your amendments dated August 16 and November 8, 2016.

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 Office of Bioequivalence has determined your Iloperidone Tablets, 1 mg, 2 mg, 4 mg, 6 mg, 8 mg, 10 mg, and 12 mg, to be bioequivalent and, therefore, therapeutically equivalent to the reference listed drug (RLD), Fanapt Tablets, 1 mg, 2 mg, 4 mg, 6 mg, 8 mg, 10 mg, and 12 mg, of Vanda Pharmaceuticals Inc. (Vanda). Your dissolution testing should be incorporated into the stability and quality control program using the same method proposed in your ANDA.

The reference listed drug (RLD) upon which you have based your ANDA, Vanda's Fanapt Tablets, 1 mg, 2 mg, 4 mg, 6 mg, 8 mg, 10 mg, and 12 mg, is subject to periods of patent protection. The following patents and expiration dates are currently listed in the agency's publication titled Approved Drug Products with Therapeutic Equivalence Evaluations (the "Orange Book"):

<u>U.S. Patent Number</u>	<u>Expiration Date</u>
8,586,610 (the '610 patent)	November 2, 2027
8,652,776 (the '776 patent)	August 31, 2030
8,999,638 (the '638 patent)	October 28, 2030
9,072,742 (the '742 patent)	January 16, 2031
9,074,254 (the '254 patent)	December 28, 2031
9,074,255 (the '255 patent)	December 17, 2030
9,074,256 (the '256 patent)	February 10, 2031
9,138,432 (the '432 patent)	September 30, 2025
9,157,121 (the '121 patent)	April 5, 2030

Your ANDA contains paragraph IV certifications under section 505(j)(2)(A)(vii)(IV) of the FD&C Act stating that the patents¹ are invalid, unenforceable, or will not be infringed by your manufacture, use, or sale of Iloperidone Tablets, 1 mg, 2 mg, 4 mg, 6 mg, 8 mg, 10 mg, and 12 mg. You have notified the agency that Inventia Healthcare Private Limited (Inventia) complied with the requirements of section 505(j)(2)(B) of the FD&C Act, and that litigation for infringement of the ‘610 patent was brought against Inventia in the United States District Court for the District of Delaware [Vanda Pharmaceuticals Inc. v. Inventia Healthcare PVT Ltd., Civil Action No. 1:15-cv-00362] and in the United States District Court for Northern District of West Virginia [Vanda Pharmaceuticals Inc. v. Inventia Healthcare PVT Ltd., Civil Action No: 3:15-cv-00059], and for infringement of the ‘432 patent in the United States District Court for the District of Delaware [Vanda Pharmaceuticals Inc. v. Inventia Healthcare PVT Ltd., Civil Action no.1:15-cv-00921].

Under section 506A of the FD&C 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 FD&C 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
Office of Prescription Drug Promotion
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 Office of Prescription Drug Promotion with a completed Form FDA 2253 at the time of their initial use.

The Generic Drug User Fee Amendments of 2012 (GDUFA) (Public Law 112-144, Title III) established certain provisions with respect to self-identification of facilities and payment of annual facility fees. Your ANDA identifies at least one facility that is subject to the self-identification requirement and payment of an annual facility fee. Self-identification must occur by June 1 of each year for the next fiscal year. Facility fees must be paid each year by the date specified in the Federal Register notice announcing facility fee amounts. All finished dosage

¹ The agency notes that the ‘610, ‘432, ‘776, ‘638, ‘742, ‘254, ‘255, ‘256, and ‘121 patents were submitted to the agency after submission of your ANDA. Litigation, if any, with respect to these patents would not create a statutory stay of approval.

forms (FDFs) or active pharmaceutical ingredients (APIs) manufactured in a facility that has not met its obligations to self-identify or to pay fees when they are due will be deemed misbranded. This means that it will be a violation of federal law to ship these products in interstate commerce or to import them into the United States. Such violations can result in prosecution of those responsible, injunctions, or seizures of misbranded products. Products misbranded because of failure to self-identify or pay facility fees are subject to being denied entry into the United States.

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(1)] 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,

Carol A. Holquist, RPh
Deputy Director
Office of Regulatory Operations
Office of Generic Drugs
Center for Drug Evaluation and Research



Carol
Holquist

Digitally signed by Carol Holquist
Date: 11/28/2016 10:38:20AM
GUID: 508da712000293e0f6d8acfd3c5e67fe

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
ANDA 207231

LABELING

NDC 0378-0630-88

100 (10 x 10) Unit-dose tablets

Iloperidone Tablets 1 mg

 **inventia**

R_xonly

Lot :

Exp. :

Pharma
Code

Store at 25°C (77°F) with excursions permitted to 15-30°C (59-86°F).

Usual dosage: See package insert

Protect from light and moisture.

Product of India

Keep out of the reach of children.

Code No. : MH/DRUGS/25/KD/638

NDC 0378-0630-88

100 (10 x 10) Unit-dose tablets

Iloperidone Tablets 1 mg

 **inventia**

R_xonly

Manufactured by:
Inventia Healthcare Private Limited
Additional Ambarnath M.I.D.C.,
Ambarnath (East) - 421506, INDIA.



Manufactured for:
Mylan Pharmaceuticals Inc.
Morgantown, WV 26505 U.S.A.

74 mm

49 mm

126 mm

 **inventia**

Iloperidone
Tablets
1 mg

NDC 0378-0630-88

100 (10 x 10) Unit-dose tablets

R_xonly

A17396C02

Store at 25°C (77°F) with excursions permitted to 15-30°C (59-86°F)
Protect from light and moisture
Keep out of the reach of children
Usual dosage See package insert
Product of India
Code No MH/DRUGS/25KD/638

NDC 0378-0630-91 60 tablets Lot
Exp

Iloperidone
Tablets
1 mg

Manufactured by
Inventia Healthcare Private Limited
Additional Ambemath MIDC,
Ambemath (East) - 421506, INDIA

Manufactured for
Mylan Pharmaceuticals Inc.
Morgantown, WV 26505 U S A


Unvarnished area

Pharma code

inventia Ranly AT278E/02

40 mm

90 mm



Store at 25°C (77°F) with excursions permitted to 15-30°C (59-86°F)
 Protect from light and moisture
 Keep out of the reach of children
 Usual dosage See package insert
 Product of India
 Code No MH/DRUGS/25KD/638

NDC 0378-0630-01 **100 tablets** Lot
 Exp

Unvarnished area

loperidone
Tablets
1 mg

Manufactured by
Inventia Healthcare Private Limited
 Additional Ambemath MIDC,
 Ambemath (East) - 421506, INDIA

Manufactured for
 Mylan Pharmaceuticals Inc.
 Morgantown, WV 26505 U S A

inventia **Rxonly** AT2785E/02

7 805378 063011 17

← Pharma code

40 mm

90 mm



NDC 0378-0631-88

100 (10 x 10) Unit-dose tablets

Iloperidone Tablets 2mg

 **inventia**

R_xonly

Lot :

Exp. :

Pharma
Code

Store at 25°C (77°F) with excursions permitted to 15-30°C (59-86°F).

Usual dosage: See package insert

Protect from light and moisture.

Product of India

Keep out of the reach of children.

Code No. : MH/DRUGS/25/KD/638

NDC 0378-0631-88

100 (10 x 10) Unit-dose tablets

Iloperidone Tablets 2mg

 **inventia**

R_xonly

Manufactured by:
Inventia Healthcare Private Limited
Additional Ambarnath M.I.D.C.,
Ambarnath (East) - 421506, INDIA.



Manufactured for:
Mylan Pharmaceuticals Inc.
Morgantown, WV 26505 U.S.A.

74 mm

49 mm

126 mm

 **inventia**

Iloperidone
Tablets
2mg

NDC 0378-0631-88

100 (10 x 10) Unit-dose tablets

R_xonly

A12937C02

Store at 25°C (77°F) with excursions permitted to 15-30°C (59-86°F)
Protect from light and moisture
Keep out of the reach of children
Usual dosage See package insert
Product of India
Code No. MHDRUGS/25KD/638

NDC 0378-0631-91 60 tablets Lot Exp

**Iloperidone
Tablets
2mg**

Manufactured by
Inventia Healthcare Private Limited
Additional Ambemeth MIDC,
Ambemeth (East) - 421506, INDIA

Manufactured for
Mylan Pharmaceuticals Inc.
Morgantown, WV 26505 U S A


Unvarnished area

Pharma code

inventia Rxonly AT2784E02

40 mm

90 mm



Store at 25°C (77°F) with excursions permitted to 15-30°C (59-86°F)
Protect from light and moisture
Keep out of the reach of children
Usual dosage See package insert
Product of India
Code No. MHDRUGS/25KD/638

NDC 0378-0631-01 100 tablets Lot Exp

**Iloperidone
Tablets
2mg**

Manufactured by
Inventia Healthcare Private Limited
Additional Ambemeth MIDC,
Ambemeth (East) - 421506, INDIA

Manufactured for
Mylan Pharmaceuticals Inc.
Morgantown, WV 26505 U S A


Unvarnished area

Pharma code

inventia Rxonly ATZ785E02

40 mm

90 mm





NDC 0378-0632-88

100 (10 x 10) Unit-dose tablets

Iloperidone Tablets 4 mg

 **inventia**

Rxonly

Lot :

Exp. :

Pharma
Code

Store at 25°C (77°F) with excursions permitted to 15-30°C (59-86°F).

Usual dosage: See package insert

Protect from light and moisture.

Product of India

Keep out of the reach of children.

Code No. : MH/DRUGS/25/KD/638

NDC 0378-0632-88

100 (10 x 10) Unit-dose tablets

Iloperidone Tablets 4 mg

 **inventia**

Rxonly

Manufactured by:
Inventia Healthcare Private Limited
Additional Ambarnath M.I.D.C.,
Ambarnath (East) - 421506, INDIA.



Manufactured for:
Mylan Pharmaceuticals Inc.
Morgantown, WV 26505 U.S.A.

74 mm

49 mm

126 mm

 **inventia**

Iloperidone
Tablets
4mg

NDC 0378-0632-88

100 (10 x 10) Unit-dose tablets

Rxonly

A17393C02

Store at 25°C (77°F) with excursions permitted to 15-30°C (59-86°F)
Protect from light and moisture
Keep out of the reach of children
Usual dosage See package insert
Product of India
Code No. MHDRUGS/25KD/638

NDC 0378-0632-91 60 tablets Lot Exp

Unvarnished area

**Iloperidone
Tablets
4 mg**


Manufactured by
Inventia Healthcare Private Limited
Additional Ambemath MIDC,
Ambemath (East) 421506, INDIA
Manufactured for
Mylan Pharmaceuticals Inc.
Morgantown, WV 26505 U S A

Pharma code

inventia Rxonly ATZ7885702

40 mm

90 mm



Store at 25°C (77°F) with excursions permitted to 15-30°C (59-86°F)
Protect from light and moisture
Keep out of the reach of children
Usual dosage See package insert
Product of India
Code No. MHDRUGS/25KD/638


NDC 0378-0632-01 100 tablets Lot Exp

Unvarnished area

Iloperidone
Tablets
4 mg

Manufactured by
Inventia Healthcare Private Limited
Additional Ambemath MIDC,
Ambemath (East) 421506, INDIA
Manufactured for
Mylan Pharmaceuticals Inc.
Morgantown, WV 26505 U S A

Pharma code



inventia

Rxonly

AT2787E02

40 mm

90 mm



NDC 0378-0633-88

100 (10 x 10) Unit-dose tablets

Iloperidone Tablets 6 mg

 **inventia**

R_xonly

Lot :

Exp. :

Pharma
Code

Store at 25°C (77°F) with excursions permitted to 15-30°C (59-86°F).

Usual dosage: See package insert

Protect from light and moisture.

Product of India

Keep out of the reach of children.

Code No. : MH/DRUGS/25/KD/638

NDC 0378-0633-88

100 (10 x 10) Unit-dose tablets

Iloperidone Tablets 6 mg

 **inventia**

R_xonly

Manufactured by:
Inventia Healthcare Private Limited
Additional Ambarnath M.I.D.C.,
Ambarnath (East) - 421506, INDIA.



Manufactured for:
Mylan Pharmaceuticals Inc.
Morgantown, WV 26505 U.S.A.

74 mm

49 mm

126 mm

 **inventia**

Iloperidone
Tablets
6mg

NDC 0378-0633-88

100 (10 x 10) Unit-dose tablets

R_xonly

A17393C02

Store at 25°C (77°F) with excursions permitted to 15-30°C (59-86°F)
Protect from light and moisture
Keep out of the reach of children
Usual dosage See package insert
Product of India
Code No. MHDRUGS/25KD/638


NDC 0378-0633-91 60 tablets Lot Exp

Unvarnished area

**Iloperidone
Tablets
6 mg**

Manufactured by
Inventia Healthcare Private Limited
Additional Ambemath MIDC,
Ambemath (East) 421506, INDIA
Manufactured for
Mylan Pharmaceuticals Inc.
Morgantown, WV 26505 U S A

Pharma code



inventia Rxonly A17298502

40 mm

90 mm

Store at 25°C (77°F) with excursions permitted to 15-30°C (59-86°F)
Protect from light and moisture
Keep out of the reach of children
Usual dosage See package insert
Product of India
Code No. MHDRUGS/25KD/638

NDC 0378-0633-01 100 tablets Lot Exp

Unvarnished area

**Iloperidone
Tablets
6 mg**


Manufactured by
Inventia Healthcare Private Limited
Additional Ambemath MIDC,
Ambemath (East) 421506, INDIA
Manufactured for
Mylan Pharmaceuticals Inc.
Morgantown, WV 26505 U S A

Pharma code

inventia Rxonly ATZ7895702

40 mm

90 mm





70 mm

120 mm

NDC 0378-0634-88

100 (10 x 10) Unit-dose tablets

Iloperidone Tablets 8 mg

 **inventia**

R_xonly

Lot :

Exp. :

Pharma
Code

Store at 25°C (77°F) with excursions permitted to 15-30°C (59-86°F).

Usual dosage: See package insert

Protect from light and moisture.

Product of India

Keep out of the reach of children.

Code No. : MH/DRUGS/25/KD/638

NDC 0378-0634-88

100 (10 x 10) Unit-dose tablets

Iloperidone Tablets 8 mg

 **inventia**

R_xonly

Manufactured by:
Inventia Healthcare Private Limited
Additional Ambarnath M.I.D.C.,
Ambarnath (East) - 421506, INDIA.



Manufactured for:
Mylan Pharmaceuticals Inc.
Morgantown, WV 26505 U.S.A.

74 mm

49 mm

126 mm

 **inventia**

Iloperidone
Tablets
8 mg

NDC 0378-0634-88

100 (10 x 10) Unit-dose tablets

R_xonly

A17940C002

Store at 25°C (77°F) with excursions permitted to 15-30°C (59-86°F)
Protect from light and moisture
Keep out of the reach of children
Usual dosage See package insert
Product of India
Code No. MHDRUGS/25KD/638

NDC 0378-0634-91 60 tablets Lot Exp

Unvarnished area

Iloperidone
Tablets
8 mg


Manufactured by
Inventia Healthcare Private Limited
Additional Ambemath MIDC,
Ambemath (East) 421506, INDIA
Manufactured for
Mylan Pharmaceuticals Inc.
Morgantown, WV 26505 U S A

Pharma code

inventia Rxonly A7290602

40 mm

90 mm



Store at 25°C (77°F) with excursions permitted to 15-30°C (59-86°F)
Protect from light and moisture
Keep out of the reach of children
Usual dosage See package insert
Product of India
Code No. MHDRUGS/25KD/638

NDC 0378-0634-01 100 tablets Lot Exp

Unvarnished area

Iloperidone
Tablets
8 mg


Manufactured by
Inventia Healthcare Private Limited
Additional Ambemath MIDC,
Ambemath (East) 421506, INDIA
Manufactured for
Mylan Pharmaceuticals Inc.
Morgantown, WV 26505 U S A

Pharma code

inventia Rxonly A7291E02

40 mm

90 mm





Code No. MHDRUSS/25K04938

Hoperidone

Tablet

10 mg

Lot Exp.

Product of India

inventia

AT2841T01

Hoperidone

Tablet

10 mg

Lot Exp.

Product of India

inventia

Hoperidone

Tablet

10 mg

Lot Exp.

Product of India

inventia

Hoperidone

Tablet

10 mg

Lot Exp.

Product of India

inventia

Hoperidone

Tablet

10 mg

Lot Exp.

Product of India

inventia

Hoperidone

Tablet

10 mg

Lot Exp.

Product of India

inventia

Hoperidone

Tablet

10 mg

Lot Exp.

Product of India

inventia

Hoperidone

Tablet

10 mg

Lot Exp.

Product of India

inventia

Hoperidone

Tablet

10 mg

Lot Exp.

Product of India

inventia

Hoperidone

Tablet

10 mg

Lot Exp.

Product of India

inventia

70 mm

120 mm

NDC 0378-0635-88

100 (10 x 10) Unit-dose tablets

Iloperidone Tablets 10 mg

 **inventia**

R_xonly

Lot :

Exp. :

Pharma
Code

Store at 25°C (77°F) with excursions permitted to 15-30°C (59-86°F).

Usual dosage: See package insert

Protect from light and moisture.

Product of India

Keep out of the reach of children.

Code No. : MH/DRUGS/25/KD/638

NDC 0378-0635-88

100 (10 x 10) Unit-dose tablets

Iloperidone Tablets 10 mg

 **inventia**

R_xonly

Manufactured by:
Inventia Healthcare Private Limited
Additional Ambarnath M.I.D.C.,
Ambarnath (East) - 421506, INDIA.



Manufactured for:
Mylan Pharmaceuticals Inc.
Morgantown, WV 26505 U.S.A.

74 mm

49 mm

126 mm

 **inventia**

Iloperidone
Tablets
10mg

NDC 0378-0635-88

100 (10 x 10) Unit-dose tablets

R_xonly

A12941C002

Store at 25°C (77°F) with excursions permitted to 15-30°C (59-86°F)
Protect from light and moisture
Keep out of the reach of children
Usual dosage See package insert
Product of India
Code No. MHDRUGS/25KD/638

NDC 0378-0635-91 60 tablets Lot Exp


Unvarnished area

**Iloperidone
Tablets
10 mg**

Manufactured by
Inventia Healthcare Private Limited
Additional Ambemath MIDC,
Ambemath (East) 421506, INDIA

Manufactured for
Mylan Pharmaceuticals Inc.
Morgantown, WV 26505 U.S.A.

Pharma code



inventia Rxonly A7292502

40 mm

90 mm

Store at 25°C (77°F) with excursions permitted to 15-30°C (59-86°F)
Protect from light and moisture
Keep out of the reach of children
Usual dosage See package insert
Product of India
Code No MH/D/DRUGS/25/KD/638

NDC 0378-0635-01 100 tablets


Lot
Exp.

Unvarnished area

**Iloperidone
Tablets
10 mg**

Manufactured by
Inventa Healthcare Private Limited
Additional Ambemath MIDC,
Ambemath (East) 421506, INDIA
Manufactured for
Mylan Pharmaceuticals Inc.
Morgantown, WV 26505 U S A

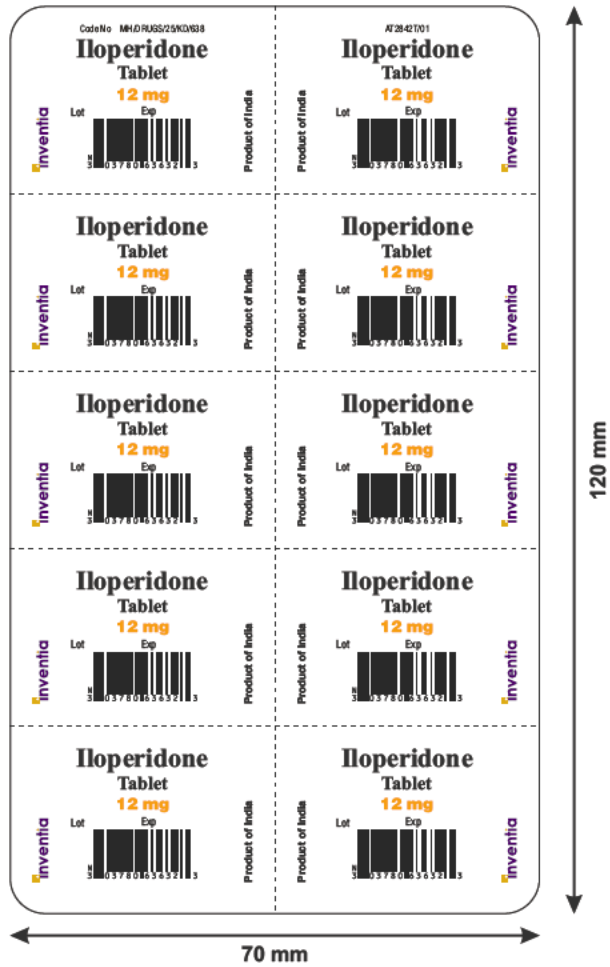
Pharma code



inventa **Rxonly** AT2783E/02

40 mm

110 mm



NDC 0378-0636-88

100 (10 x 10) Unit-dose tablets

Iloperidone Tablets 12 mg

 **Inventia**

Rxonly



Lot :

Exp. :

Pharma
Code

Store at 25°C (77°F) with excursions permitted to 15-30°C (59-86°F).

Usual dosage: See package insert

Protect from light and moisture.

Product of India

Keep out of the reach of children.

Code No. : MH/DRUGS/25/KD/638

NDC 0378-0636-88

100 (10 x 10) Unit-dose tablets

Iloperidone Tablets 12 mg

 **Inventia**

Rxonly

Manufactured by:
Inventia Healthcare Private Limited
Additional Ambernath M.I.D.C.,
Ambernath (East) - 421506, INDIA.



Manufactured for:
Mylan Pharmaceuticals Inc.
Morgantown, WV 26505 U.S.A.

74 mm

49 mm

126 mm

 **Inventia**

Iloperidone
Tablets
12 mg

Rxonly

NDC 0378-0636-88

100 (10 x 10) Unit-dose tablets

A172842C/02

Store at 25°C (77°F) with excursions permitted to 15-30°C (59-86°F)
Protect from light and moisture
Keep out of the reach of children
Usual dosage See package insert
Product of India
Code No. MHDRUGS/25KD/638

NDC 0378-0636-91 60 tablets Lot Exp

**Iloperidone
Tablets
12 mg**

Manufactured by
Inventia Healthcare Private Limited
Additional Ambemath MIDC,
Ambemath (East) 421506, INDIA
Manufactured for
Mylan Pharmaceuticals Inc.
Morgantown, WV 26505 U S A

Unvarnished area


Pharma code

inventia Rxonly

A7294E02

40 mm

90 mm



Store at 25°C (77°F) with excursions permitted to 15-30°C (59-86°F)
Protect from light and moisture
Keep out of the reach of children
Usual dosage See package insert
Product of India
Code No MH/D/DRUGS/25/KD/638

NDC 0378-0636-01 100 tablets

Lot
Exp.

Unvarnished area

Iloperidone
Tablets
12 mg

Manufactured by
Inventa Healthcare Private Limited
Additional Ambemath MIDC,
Ambemath (East) 421506, INDIA
Manufactured for
Mylan Pharmaceuticals Inc.
Morgantown, WV 26505 U S A

Pharma code

inventa **Rxonly** AT2786E/02

40 mm

110 mm

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
ANDA 207231

BIOEQUIVALENCE REVIEW(s)

**DIVISION OF BIOEQUIVALENCE
DISSOLUTION ACKNOWLEDGEMENT REVIEW**

ANDA No.	207231
Drug Product Name	Iloperidone Tablets
Strength (s)	1 mg, 2 mg, 4 mg, 6 mg, 8 mg, 10 mg, 12 mg
Applicant Name	Inventia Healthcare Private Limited
Applicant Address	Unit 703 and 704, 7 th floor Hubtown solaris N.S.Phadke Marg, Andheri (East) Mumbai, Maharashtra, India 400069
US Agent Name and the mailing address	Jeanne Taborsky SciRegs International, Inc. 6333 Summercrest Drive Columbia, MD 21045
US Agent's Telephone Number	410-309-3145
US Agent's Fax Number	410-309-6145
Original Submission Date(s)	May 21, 2014
Submission Date(s) of Amendment(s) Under Review	June 10, 2015 - Bioequivalence/Response to Information Request (Dissolution Acknowledgement)
Reviewer	Mignon Schley-Lagoke, Pharm.D.
OVERALL DISSOLUTION REVIEW RESULT	ADEQUATE

EXECUTIVE SUMMARY

This is a review of the dissolution method and/or specification acknowledgement from Inventia Healthcare Private Limited on June 10, 2015. Inventia Healthcare Private Limited has accepted the following FDA-recommended dissolution method and specification:

USP Apparatus:	II (paddle)
Rotational Speed:	50 rpm
Temperature:	37°C ± 0.5°C
Media:	0.1 N Hydrochloric Acid
Volume:	500 mL
Specification:	NLT ^(b) ₍₄₎ % (Q) dissolved in 30 minutes

RECOMMENDATIONS

From a bioequivalence point of view, Inventia Healthcare Private Limited has met the requirements for in vitro dissolution testing. The dissolution testing section of the application is adequate and we have no further questions at this time.

DISSOLUTION COMMENT TO BE PROVIDED TO THE APPLICANT

ANDA: 207231

APPLICANT: Inventia Healthcare Private Limited

DRUG PRODUCT: Iloperidone Tablets 1 mg, 2 mg, 4 mg, 6 mg, 8 mg, 10 mg, 12 mg

The Division of Bioequivalence I (DBI) has completed its review of your submission acknowledged on the coversheet and has no further questions at this time. We acknowledge that you will conduct the dissolution testing of your test product using the following FDA-recommended dissolution method and specification:

USP Apparatus:	II (paddle)
Rotational Speed:	50 rpm
Temperature:	37°C ± 0.5°C
Media:	0.1 N Hydrochloric Acid
Volume:	500 mL
Specification:	NLT ^(b) ₍₄₎ % (Q) dissolved in 30 minutes

Sincerely yours,

{See appended electronic signature page}

Wayne I. DeHaven, Ph.D.
Acting Director
Division of Bioequivalence I
Office of Generic Drugs Center for Drug Evaluation
and Research

DIVISION OF BIOEQUIVALENCE DISSOLUTION REVIEW

ANDA No.	207231
Drug Product Name	Iloperidone Tablets
Strength (s)	1 mg, 2 mg, 4 mg, 6 mg, 8 mg, 10 mg, 12 mg
Applicant Name	Inventia Healthcare Private Limited
Applicant Address	Unit 703 and 704, 7 th floor Hubtown solaris N.S.Phadke Marg, Andheri (East) Mumbai, Maharashtra, India 400069
US Agent Name and the mailing address	SciRegs International, Inc. Jeanne Taborsky 6333 Summercrest Drive Columbia, MD 21045
US Agent's Telephone Number	410-309-3145
US Agent's Fax Number	410-309-6145
Original Submission Date(s)	05/21/2014
Submission Date(s) of Amendment(s) Under Review	04/02/2015
Reviewer	Susan L Young
Dissolution Method	ADEQUATE
OVERALL REVIEW RESULT	INADEQUATE

I. EXECUTIVE SUMMARY

This is a review of dissolution testing only.

The application references Fanapt (iloperidone) Tablets, 1mg, 2mg, 4mg, 6mg, 8mg, 10mg, 12mg (NDA # N022192 currently held by Vanda Pharmaceuticals, Inc and approved May 6, 2009).

There is no USP monograph for this product but there is an FDA- recommended method: 500 mL 0.1N HCl using USP apparatus II (paddle) at 50 rpm. Recommended sampling times are 5, 10, 15, 30, 45 and 60 minutes. The firm only performed the 5 minute sampling for the pilot studies, but not for the exhibit batches. For the dosage strengths 6 mg, 8 mg, 10 mg, 12 mg manufactured from a common granule lot, there is a slightly slower drug release than for the dosage strengths 1 mg, 2 mg, 4 mg. The firm's dissolution testing data utilizing the recommended method are acceptable.

The firm's proposed specification of 'Not less than (NLT) (b)(4)% (Q) of the labeled amount of iloperidone is dissolved in 30 minutes' is too liberal. Based on the data submitted, the DB recommends a more appropriate specification of NLT (b)(4)% (Q) of the labeled amount of iloperidone is dissolved in 30 minutes.

The firm's dissolution method is **inadequate**.

The fasting and fed BE studies and waiver requests will be reviewed at a later date.

II. DISSOLUTION REVIEW

II.1 Submission Content Checklist

Information	YES	NO	N/A
Is there a posted dissolution method on the FDA website?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Did the firm use the above method?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is there a USP dissolution method?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Did the firm use the USP dissolution method?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Did the firm use 12 units of both test and reference in dissolution testing?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Did the firm provide complete dissolution data (all raw data, range, mean, % CV, dates of dissolution testing)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Did the firm conduct dissolution testing with its own proposed method?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Did the firm submit dissolution method validation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

II.2 Dissolution Method As Posted on the FDA Website (if any)¹

Drug Name	Dosage Form	USP Apparatus	Speed (RPMs)	Medium	Volume (mL)	Recommended Sampling Times (minutes)	Date Updated
iloperidone	tablet	II (Paddle)	50	0.1N HCl	500	5, 10, 15, 30, 45 and 60	08/05/2010

DB Internal Dissolution Database

NA

II.3 USP Method (if any)

NA

¹ External dissolution database:
http://www.accessdata.fda.gov/scripts/cder/dissolution/dsp_SearchResults_Dissolutions.cfm, Last accessed date 4/8/2015

II.4 Summary of In Vitro Dissolution Data

Table 5 Summary of In Vitro Dissolution Studies

Dissolution Conditions		Apparatus:	USP Type II (Paddle)								
		Speed of Rotation:	50 RPM								
		Medium:	0.1 N Hydrochloric acid								
		Volume:	500 mL								
		Temperature:	37°C ± 0.5°C								
Firm's Proposed Specifications		For 30 mins - Not Less Than ^(b) ₍₄₎ % (Q)									
Dissolution Testing Site (Name, Address)		INVENTIA HEALTHCARE PVT. LTD, Plot No.F1 & F-1/1, Additional MIDC, Ambernath (East)-421 506 District: Thane, Maharashtra, India									
Study Ref No.	Testing Date	Product ID \ Batch No. (Test - Manufacture Date) (Reference – Expiry Date)	Dosage Strength & Form	No. of Dosage Units		Collection Times (mins)					Study Report Location
						10	15	30	45	60	
EXB/618/01	Nov. 2013	Test Product: Iloperidone Tablets Mfg date: Jul. 2013	1 mg Tablet	12	Mean	96	97	97	97	98	Section 2.7.1.2
					Range	^(b) ₍₄₎					
					% CV	2.4	2.4	3.2	3.4	3.3	
Lot No. FFZN	Nov. 2013	Reference Listed Product: Fanapt® Iloperidone Tablets Exp. date: Apr. 2014	1 mg Tablet	12	Mean	93	94	95	95	95	Section 2.7.1.2
					Range	^(b) ₍₄₎					
					% CV	3.0	1.9	1.8	1.8	1.6	

Table 5 Summary of In Vitro Dissolution Studies

Dissolution Conditions		Apparatus:	USP Type II (Paddle)								
		Speed of Rotation:	50 RPM								
		Medium:	0.1 N Hydrochloric acid								
		Volume:	500 mL								
		Temperature:	37°C ± 0.5°C								
Firm's Proposed Specifications		For 30 mins - Not Less Than ^(b) ₍₄₎ % (Q)									
Dissolution Testing Site (Name, Address)		INVENTIA HEALTHCARE PVT. LTD, Plot No.F1 & F-1/1, Additional MIDC, Ambernath (East)-421 506 District: Thane, Maharashtra, India									
Study Ref No.	Testing Date	Product ID \ Batch No. (Test - Manufacture Date) (Reference – Expiry Date)	Dosage Strength & Form	No. of Dosage Units		Collection Times (mins)					Study Report Location
						10	15	30	45	60	
EXB/619/01	Nov. 2013	Test Product: Iloperidone Tablets Mfg date: Jul. 2013	2 mg Tablet	12	Mean	99	100	101	102	102	Section 2.7.1.2 ^(b) ₍₄₎
					Range						
					% CV	2.0	1.4	2.5	2.4	2.6	
Lot No. FFZP	Nov. 2013	Reference Product: Fanapt® Iloperidone Tablets Exp. date: Apr. 2014	2 mg Tablet	12	Mean	94	96	96	97	97	Section 2.7.1.2 ^(b) ₍₄₎
					Range						
					% CV	5.0	3.5	5.0	5.3	4.4	

Table 5 Summary of In Vitro Dissolution Studies

Dissolution Conditions		Apparatus:	USP Type II (Paddle)								
		Speed of Rotation:	50 RPM								
		Medium:	0.1 N Hydrochloric acid								
		Volume:	500 mL								
		Temperature:	37°C ± 0.5°C								
Firm's Proposed Specifications		For 30 mins - Not Less Than ^(b) ₍₄₎ % (Q)									
Dissolution Testing Site (Name, Address)		INVENTIA HEALTHCARE PVT. LTD, Plot No.F1 & F-1/1, Additional MIDC, Ambernath (East)-421 506 District: Thane, Maharashtra, India									
Study Ref No.	Testing Date	Product ID \ Batch No. (Test - Manufacture Date) (Reference – Expiry Date)	Dosage Strength & Form	No. of Dosage Units	Collection Times (mins)					Study Report Location	
					10	15	30	45	60		
EXB/620/01	Nov. 2013	Test Product: Iloperidone Tablets Mfg date: Jul. 2013	4 mg Tablet	12	Mean	89	93	97	97	97	Section 2.7.1.2
					Range	^(b) ₍₄₎					
					% CV	2.2	1.9	2.1	2.0	1.7	
Lot No. FFZM	Nov. 2013	Reference Product: Fanapt® Iloperidone Tablets Exp. date: Apr. 2014	4 mg Tablet	12	Mean	92	94	97	97	97	Section 2.7.1.2
					Range	^(b) ₍₄₎					
					% CV	3.6	2.4	2.3	2.0	2.7	

Table 5 Summary of In Vitro Dissolution Studies

Dissolution Conditions		Apparatus:	USP Type II (Paddle)								
		Speed of Rotation:	50 RPM								
		Medium:	0.1 N Hydrochloric acid								
		Volume:	500 mL								
		Temperature:	37°C ± 0.5°C								
Firm's Proposed Specifications		For 30 mins - Not Less Than ^(b) ₍₄₎ % (Q)									
Dissolution Testing Site (Name, Address)		INVENTIA HEALTHCARE PVT. LTD, Plot No.F1 & F-1/1, Additional MIDC, Ambernath (East)-421 506 District: Thane, Maharashtra, India									
Study Ref No.	Testing Date	Product ID \ Batch No. (Test - Manufacture Date) (Reference – Expiry Date)	Dosage Strength & Form	No. of Dosage Units	Collection Times (mins)					Study Report Location	
					10	15	30	45	60		
EXB/621/01	Nov. 2013	Test Product: Iloperidone Tablets Mfg date: Jul. 2013	6 mg Tablet	12	Mean	82	91	98	99	100 ^(b) ₍₄₎	Section 2.7.1.2
					Range	[REDACTED]					
					% CV	3.5	2.3	2.3	2.2	2.3	
Lot No. FYPB	Nov. 2013	Reference Product: Fanapt® Iloperidone Tablets Exp. date: Jul. 2014	6 mg Tablet	12	Mean	95	97	100	100	100 ^(b) ₍₄₎	Section 2.7.1.2
					Range	[REDACTED]					
					% CV	1.6	1.3	1.2	1.1	1.2	

Table 5 Summary of In Vitro Dissolution Studies

Dissolution Conditions		Apparatus:	USP Type II (Paddle)								
		Speed of Rotation:	50 RPM								
		Medium:	0.1 N Hydrochloric acid								
		Volume:	500 mL								
		Temperature:	37°C ± 0.5°C								
Firm's Proposed Specifications		For 30 mins - Not Less Than ^(b) ₍₄₎ % (Q)									
Dissolution Testing Site (Name, Address)		INVENTIA HEALTHCARE PVT. LTD, Plot No.F1 & F-1/1, Additional MIDC, Ambernath (East)-421 506 District: Thane, Maharashtra, India									
Study Ref No.	Testing Date	Product ID \ Batch No. (Test - Manufacture Date) (Reference – Expiry Date)	Dosage Strength & Form	No. of Dosage Units		Collection Times (mins)					Study Report Location
						10	15	30	45	60	
EXB/622/01	Nov. 2013	Test Product: Iloperidone Tablets Mfg date: Jul. 2013	8 mg Tablet	12	Mean	81	89	98	99	99	Section 2.7.1.2
					Range	^(b) ₍₄₎					
					% CV	2.6	2.0	1.9	1.2	1.5	
Lot No. FYPC	Nov. 2013	Reference Product: Fanapt® Iloperidone Tablets Exp. date: Apr. 2014	8 mg Tablet	12	Mean	95	98	100	100	100	Section 2.7.1.2
					Range	^(b) ₍₄₎					
					% CV	1.0	1.2	0.7	1.2	1.2	

Table 5 Summary of In Vitro Dissolution Studies

Dissolution Conditions		Apparatus:	USP Type II (Paddle)								
		Speed of Rotation:	50 RPM								
		Medium:	0.1 N Hydrochloric acid								
		Volume:	500 mL								
		Temperature:	37°C ± 0.5°C								
Firm's Proposed Specifications		For 30 mins - Not Less Than ^(b) ₍₄₎ % (Q)									
Dissolution Testing Site (Name, Address)		INVENTIA HEALTHCARE PVT. LTD, Plot No.F1 & F-1/1, Additional MIDC, Ambernath (East)-421 506 District: Thane, Maharashtra, India									
Study Ref No.	Testing Date	Product ID \ Batch No. (Test - Manufacture Date) (Reference – Expiry Date)	Dosage Strength & Form	No. of Dosage Units	Collection Times (mins)					Study Report Location	
					10	15	30	45	60		
EXB/623/01	Nov. 2013	Test Product: Iloperidone Tablets Mfg date: Jul. 2013	10 mg Tablet	12	Mean	80	89	98	100	100 ^(b) ₍₄₎	Section 2.7.1.2
					Range	[REDACTED]					
					% CV	2.3	1.9	2.0	1.9	1.7	
Lot No. DXFY	Nov. 2013	Reference Product: Fanapt® Iloperidone Tablets Exp. date: Apr. 2014	10 mg Tablet	12	Mean	87	92	96	97	98 ^(b) ₍₄₎	Section 2.7.1.2
					Range	[REDACTED]					
					% CV	2.5	1.3	1.0	0.7	1.0	

Table 5 Summary of In Vitro Dissolution Studies

Dissolution Conditions		Apparatus:	USP Type II (Paddle)								
		Speed of Rotation:	50 RPM								
		Medium:	0.1 N Hydrochloric acid								
		Volume:	500 mL								
		Temperature:	37°C ± 0.5°C								
Firm's Proposed Specifications		For 30 mins - Not Less Than ^(b) ₍₄₎ % (Q)									
Dissolution Testing Site (Name, Address)		INVENTIA HEALTHCARE PVT. LTD, Plot No.F1 & F-1/1, Additional MIDC, Ambernath (East)-421 506 District: Thane, Maharashtra, India									
Study Ref No.	Testing Date	Product ID \ Batch No. (Test - Manufacture Date) (Reference – Expiry Date)	Dosage Strength & Form	No. of Dosage Units		Collection Times (mins)					Study Report Location
						10	15	30	45	60	
EXB/624/01	Nov. 2013	Test Product: Iloperidone Tablets Mfg date: Jul. 2013	12 mg Tablet	12	Mean	82	89	98	100	100	Section 2.7.1.2
					Range	^(b) ₍₄₎					
					% CV	4.4	2.5	2.8	2.5	2.8	
Lot No. KKTF	Nov. 2013	Reference Product: Fanapt® Iloperidone Tablets Exp. date: Dec. 2015	12 mg Tablet	12	Mean	92	96	100	101	101	Section 2.7.1.2
					Range	^(b) ₍₄₎					
					% CV	1.5	1.7	1.6	1.2	1.4	

Dissolution Method SOP effective at the time of testing (Yes/No)	Yes, method & validation done concurrently
Were the drug product units pooled during the dissolution testing (Yes/No)?	No
Was the dissolution testing conducted on the bio-batch?	Yes
Age of the test product at the time of dissolution testing.	4 months
Was the reference product expired at the time of dissolution testing (Yes/No)	No
Comments on the variability of the dissolution data	acceptable
For two-stage dissolution testing, comment on the method of medium change from acid stage to buffer stage.	NA

III. Reviewer's Comments for Dissolution Testing

- The application references Fanapt (iloperidone) tablets, 1mg, 2mg, 4mg, 6mg, 8mg, 10mg, 12mg (NDA # N022192 currently held by Vanda Pharmaceuticals, Inc and approved May 6, 2009).
- There is no USP monograph for this product but there is an FDA-recommended method: 500mL 0.1N HCl using USP apparatus II (paddle) at 50 rpm. Recommended sampling times are 5, 10, 15, 30, 45 and 60 minutes. The firm only performed the 5 minute sampling for the pilot studies, but not for the exhibit batches. For the dosage strengths 6 mg, 8 mg, 10 mg, 12 mg manufactured from a common granule lot, there is a slightly slower drug release than for the dosage strengths 1 mg, 2 mg, 4 mg. The firm's dissolution testing data utilizing the recommended method are acceptable.
- The firm's proposed specification 'Not less than (b)(4)% (Q) of the labeled amount of iloperidone is dissolved in 30 minutes' is too liberal. Based on the data submitted, the DB recommends specification of NLT (b)(4)% (Q) of the labeled amount of iloperidone is dissolved in 30 minutes.
- The DB recommended specification 'NLT (b)(4)% (Q) in 30 minutes' is the same as recommended by the NDA applicant for the RLD product. The reviewer checked the NDA Annual report for the above mentioned specification for the RLD product.
- The firm's dissolution method is **inadequate**.

IV. Deficiency Comments for Dissolution Testing

The firm's proposed specification is:

Not less than (b)(4)% (Q) of the labeled amount of iloperidone is dissolved in 30 minutes. Based on the data submitted, the firm's specification is too liberal. The firm should acknowledge the FDA recommended specification of NLT (b)(4)% (Q) of the labeled amount of iloperidone is dissolved in 30 minutes.

V. Dissolution Recommendations

The in vitro dissolution conducted by Inventia Healthcare Private Limited on its test product Iloperidone Tablets, 1 mg (batch # EXB/618/01 manufactured July 2013), 2 mg (batch # EXB/619/01 manufactured July 2013), 4 mg (batch # EXB/620/01 manufactured July 2013), 6 mg (batch # EXB/621/01 manufactured July 2013), 8 mg (batch # EXB/622/01 manufactured July 2013), 10 mg (batch # EXB/623/01 manufactured July 2013), 12 mg (batch # EXB/624/01 manufactured July 2013), comparing them to Fanapt (iloperidone) Tablets, 1 mg (batch # FFZN expiration April 2014), 2 mg (batch # FFZP expiration April 2014), 4 mg (batch # FFZM expiration April 2014), 6 mg (batch # FYPB expiration July 2014), 8 mg (batch # FYPC expiration April 2014), 10 mg (batch # DXFY expiration April 2014), 12 mg (batch # KKTF expiration December 2015), is **inadequate** due to the deficiency comment above.

BIOEQUIVALENCE DEFICIENCIES TO BE PROVIDED TO THE APPLICANT
(PROCESSED BY BIO-PM)

ANDA: 207231

APPLICANT: Inventia Healthcare Private Limited

DRUG PRODUCT: Iloperidone Tablets 1 mg, 2 mg, 4 mg, 6 mg, 8 mg, 10 mg, 12 mg

The Division of Bioequivalence I (DBI) has completed its review of the dissolution testing portion of your submission acknowledged on the cover sheet. DB will review the fasting and fed BE studies and waiver requests later.

Your dissolution testing data are acceptable; however, your proposed specification is too liberal and not acceptable. Please acknowledge the following FDA recommended method and specification for your test product:

USP Apparatus:	II (paddle)
Rotational Speed:	50 rpm
Temperature:	37°C ± 0.5°C
Media:	0.1 N Hydrochloric Acid
Volume:	500 mL
Specification:	NLT ^(b) ₍₄₎ % (Q) dissolved in 30 minutes

The bioequivalence comments provided in this communication are comprehensive as of issuance. However, these comments are subject to revision if additional concerns raised by chemistry, manufacturing and controls, microbiology, labeling, other scientific or regulatory issues or inspectional results arise in the future. Please be advised that these concerns 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}

Wayne I. DeHaven, Ph.D.
Acting Director, Division of Bioequivalence I
Office of Bioequivalence
Office of Generic Drugs
Center for Drug Evaluation and Research

DIVISION OF BIOEQUIVALENCE REVIEW

ANDA No.	207231	
Drug Product Name	Iloperidone Tablets	
Strength(s)	1 mg, 2 mg, 4 mg, 6 mg, 8 mg, 10 mg, 12 mg	
Applicant Name	Inventia Healthcare Private Limited	
Applicant Address	Unit 703 and 704, 7th floor, Hubtown solaris, N.S.Phadke Marg, Andheri(East), Mumbai, Maharashtra, India, 400069 prasad.virkar@inventiahealthcare.com	
US Contact Name and US Mailing Address	C. Jeanne Taborsky, President and CEO, SciRegs International, Inc., US Agent 6333 Summercrest Drive, Columbia, MD, 21045 jeanne.taborsky@SciRegs.com	
US Contact Telephone Number	410-309-3145	
US Contact Fax Number	410-309-6145	
Original Submission Date(s)	05/21/2014	
Submission Date(s) of Amendment(s) Under Review	N/A	
Reviewer	Yi Zhang, M.D., Ph.D.	
Study Number(s)	H216-12	H217-12
Study Type(s)	Fasting	Fed
Strength(s)	2 x 1 mg	2 x 1 mg
Clinical Site	Clinical Pharmacology Unit GVK BIOSCIENCES PVT. LTD.	
Clinical Site Address	1st& 7th Floor, Swarna Jayanthi Commercial Complex Ameerpet, Hyderabad – 500 038, India. Phone No.: +91-40-6627-5555 Fax No. : +91-40-6627-5599	
Analytical Site	(b) (4)	
Analytical Site Address	(b) (4)	
OSIS status	<u>Backlog, Year 1 and Year 2 ANDAs</u> <input type="checkbox"/> Pending <input checked="" type="checkbox"/> Complete <input type="checkbox"/> N/A (Waiver)	<u>Post October 1, 2014 ANDAs</u> <input type="checkbox"/> To Be Determined by OSIS <input type="checkbox"/> Pending For Cause Inspection <input type="checkbox"/> Complete

Waiver	<input checked="" type="checkbox"/> Granted <input type="checkbox"/> Tentatively granted <input type="checkbox"/> Not granted <input type="checkbox"/> N/A		
QC Dissolution	<input type="checkbox"/> Pending <input checked="" type="checkbox"/> Adequate <input type="checkbox"/> Inadequate		
Formulation	<input checked="" type="checkbox"/> Adequate <input type="checkbox"/> Inadequate		
Will Response to CR Result in a Reformulation?	<input type="checkbox"/> Possibly <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A		
Overall Review Result	<input checked="" type="checkbox"/> Adequate <input type="checkbox"/> Inadequate		
Revised/New Draft Guidance Generated as Part of Current Review	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		
Communication	<input type="checkbox"/> ECD <input type="checkbox"/> IR <input checked="" type="checkbox"/> Not Applicable		
Bioequivalence study tracking/supporting document #	Study/test type	Strength	Review Result
1	Fasting	1 mg	<input checked="" type="checkbox"/> Adequate <input type="checkbox"/> Inadequate
1	Fed	1 mg	<input checked="" type="checkbox"/> Adequate <input type="checkbox"/> Inadequate
1	Waiver	2 mg, 4 mg, 6 mg, 8 mg, 10 mg, 12 mg	<input checked="" type="checkbox"/> Adequate <input type="checkbox"/> Inadequate

1 EXECUTIVE SUMMARY

This application contains the results of the fasting and fed bioequivalence (BE) studies comparing a test product, Inventia Healthcare Private Limited's Iloperidone Tablets, 1 mg to the corresponding reference product Fanapt® (iloperidone) tablets, 1 mg. Each of the BE studies was designed as a single-dose, two-way crossover study in healthy male subjects. The firm's fasting and fed BE studies are acceptable. The results are summarized in the tables below.

Iloperidone Tablets (No of subjects completed = 46)						
Dose (2 × 1 mg)						
Iloperidone Least Squares Geometric Means, Ratio of Means, and 90% Confidence Intervals						
Fasting Bioequivalence Study No. H216-12						
Parameter (units)	N	Test	RLD	Ratio	90% C.I.	
AUC_{0-t} (hr *pg/ml)	46	21521.24	21198.30	1.02	98.09	105.08
AUC_∞ (hr *pg/ml)	46	23742.49	23252.46	1.02	98.13	106.24
C_{max} (pg/ml)	46	1298.86	1307.87	0.99	89.73	109.92

Iloperidone Tablets (No of subjects completed = 46) Dose (2 × 1 mg) P88 Least Squares Geometric Means, Ratio of Means, and 90% Confidence Intervals						
Fasting Bioequivalence Study No. H216-12						
Parameter (units)	N	Test	RLD	Ratio		
AUC _{0-t} (hr *pg/ml)	46	47740.49	47181.02	1.01		
AUC _∞ (hr *pg/ml)	46	54400.06	54358.11	1.00		
C _{max} (pg/ml)	46	1834.23	1767.49	1.04		

Iloperidone Tablets (No of subjects completed = 66) Dose (2 × 1 mg) Iloperidone Least Squares Geometric Means, Ratio of Means, and 90% Confidence Intervals						
Fed Bioequivalence Study No. H217-12						
Parameter (units)	N	Test	RLD	Ratio	90% C.I.	
AUC _{0-t} (hr *pg/ml)	66	24319.62	24641.24	0.99	96.55	100.89
AUC _∞ (hr *pg/ml)	66	26260.64	26748.58	0.98	95.87	100.54
C _{max} (pg/ml)	66	1235.14	1322.78	0.93	87.69	99.43

Iloperidone Tablets (No of subjects completed = 66) Dose (2 × 1 mg) P88 Least Squares Geometric Means, Ratio of Means, and 90% Confidence Intervals						
Fed Bioequivalence Study No. H217-12						
Parameter (units)	N	Test	RLD	Ratio		
AUC _{0-t} (hr *pg/ml)	66	63956.49	65265.35	0.98		
AUC _∞ (hr *pg/ml)	66	73285.47	74597.09	0.98		
C _{max} (pg/ml)	66	2058.48	2133.44	0.96		

In the BE studies, the pharmacokinetic (PK) parameters of the test and reference products for the active metabolite P88 were comparable. Therefore, the metabolite data are supportive and the studies are acceptable.

In addition to the pivotal BE studies, the firm conducted three pilot studies: pilot fasting (H029-12), pilot fed (H030-12), and pilot fasting (H031-12) in healthy subjects. The formulations of studies# H029-12 and H030-12 are similar to the formulation of the pivotal BE studies; the formulation of study H031-12 are identical to the formulation of the pivotal BE studies. For all three pilot BE studies, the 90% CI for C_{max} falls outside the acceptable BE limit of 80-125%, therefore were failed to demonstrate bioequivalence.

All studies were considered to be underpowered as the numbers of subjects enrolled in the studies were inadequate ($N \leq 11$).

Dissolution data were reviewed separately, and the firm's in vitro dissolution testing with the FDA-recommended method and specification is **adequate**¹. The dissolution data are adequate with respect to supporting waiver requests of the lower strengths.

The Division of bioequivalence (DB) **grants the waiver** of in vivo bioequivalence study requirements for the 2 mg, 4 mg, 6 mg, 8 mg, 10 mg, and 12 m strengths of the test product, Iloperidone Tablets, under the Section 21 CFR § 320.22 (d) (2).

No Office of Study Integrity and Surveillance (OSIS) inspection is pending or necessary.

The application is acceptable with no deficiencies.

¹ GDRP ANDA-207206-ORIG-1, Biopharmaceutics Primary Review (completion date 13-Mar-2015), <http://panorama.fda.gov/project/view?ID=542105b400174cbeced761dc1a9f65e4>

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3 SUBMISSION SUMMARY

3.1 Drug Product Information

Test Product	Iloperidone Tablets, 1 mg, 2 mg, 4 mg, 6 mg, 8 mg, 10 mg, 12 mg
Reference Product²	Fanapt® (iloperidone) Tablets, 1 mg (RLD), 2 mg, 4 mg, 6 mg, 8 mg, 10 mg, 12 mg
RLD Manufacturer	Vanda Pharmaceuticals Inc.
NDA No.	22192
RLD Approval Date	May 6, 2009 (all 7 strengths)

3.2 PK/PD Information³


Most recent RLD label (provide embedded document)	 RLD labeling_022192.pdf
Indication	<p>Fanapt® is an atypical antipsychotic agent and indicated for the treatment of schizophrenia in adults. Efficacy was established in two short-term (4-and 6-week) placebo-and active-controlled studies of adult patients with schizophrenia. In choosing among treatments, prescribers should consider the ability of Fanapt® to prolong the QT interval and the use of other drugs first. Prescribers should also consider the need to titrate Fanapt® slowly to avoid orthostatic hypotension, which may lead to delayed effectiveness compared to some other drugs that do not require similar titration.</p>
Boxed warning	<p>WARNING: INCREASED MORTALITY IN ELDERLY PATIENTS WITH DEMENTIA-RELATED PSYCHOSIS</p> <p>Elderly patients with dementia-related psychosis treated with antipsychotic drugs are at an increased risk of death. Analysis of seventeen placebo-controlled trials (modal duration 10 weeks), largely in patients taking atypical antipsychotic drugs, revealed a risk of death in the drug-treated patients of between 1.6 to 1.7 times the risk of death in placebo-treated patients. Over the course of a typical 10-week controlled trial, the rate of death in drug-treated patients was about 4.5%, compared to a rate of about 2.6% in the placebo group. Although the causes of death were varied, most of the deaths appeared to be either cardiovascular (e.g., heart failure, sudden death)</p>

² Electronic Orange Book (Updated Through January 2016): last assessed: 02/29/2016.
http://www.accessdata.fda.gov/scripts/cder/ob/docs/obdetail.cfm?Appl_No=022192&TABLE1=OB_Rx
³ RLD label (DRUGS@FDA;Initial U.S. Approval: 2009, last revised 01/05/2016, last accessed 2/26/2016,
http://www.accessdata.fda.gov/drugsatfda_docs/label/2016/022192s017lbl.pdf

	<p>or infectious (e.g., pneumonia) in nature.</p> <p>Observational studies suggest that, similar to atypical antipsychotic drugs, treatment with conventional antipsychotic drugs may increase mortality. The extent to which the findings of increased mortality in observational studies may be attributed to the antipsychotic drug as opposed to some characteristic(s) of the patients is not clear. FANAPT is not approved for the treatment of patients with Dementia-Related Psychosis.</p>
Bioavailability	Iloperidone is well absorbed after administration of the tablet. The relative bioavailability of the tablet formulation compared to oral solution is 96%.
Food Effect	Administration of iloperidone with a standard high-fat meal did not significantly affect the C _{max} or AUC of iloperidone, P88, or P95, but delayed T _{max} by 1 hour for iloperidone, 2 hours for P88 and 6 hours for P95. FANAPT can be administered without regard to meals.
T_{max}	Within 2 to 4 hours
Metabolism	<p>Elimination of iloperidone is mainly through hepatic metabolism involving 2 P450 isozymes, CYP2D6 and CYP3A4.</p> <p>Iloperidone is metabolized primarily by 3 biotransformation pathways: carbonyl reduction, hydroxylation (mediated by CYP2D6) and O-demethylation (mediated by CYP3A4). There are 2 predominant iloperidone metabolites, P95 and P88. The iloperidone metabolite P95 represents 47.9% of the AUC of iloperidone and its metabolites in plasma at steady-state for extensive metabolizers (EM) and 25% for poor metabolizers (PM). The active metabolite P88 accounts for 19.5% and 34.0% of total plasma exposure in EM and PM, respectively.</p> <p>Approximately 7% -10% of Caucasians and 3% -8% of black/African Americans lack the capacity to metabolize CYP2D6 substrates and are classified as poor metabolizers (PM), whereas the rest are intermediate, extensive or ultra-rapid metabolizers. Coadministration of FANAPT with known strong inhibitors of CYP2D6 like fluoxetine results in a 2.3-fold increase in iloperidone plasma exposure, and therefore one-half of the FANAPT dose should be administered.</p> <p>Similarly, PMs of CYP2D6 have higher exposure to iloperidone compared with EMs and PMs should have their dose reduced by one-half. Laboratory tests are available to identify CYP2D6 PMs.</p> <p>Iloperidone and P88 are not substrates of P-gp and iloperidone is a weak P-gp inhibitor.</p>
Excretion	The bulk of the radioactive materials were recovered in the urine (mean 58.2% and 45.1% in EM and PM,

	respectively), with feces accounting for 19.9% (EM) to 22.1% (PM) of the dosed radioactivity.
Half-life	The observed mean elimination half-lives for iloperidone, P88 and P95 in CYP2D6 extensive metabolizers (EM) are 18, 26 and 23 hours, respectively, and in poor metabolizers (PM) are 33, 37 and 31 hours, respectively. Steady-state concentrations are attained within 3-4 days of dosing.
Maximum Daily Dose	24 mg

3.3 OGD Recommendations for Drug Product

Source of most recent recommendations or provide the embedded document to the current draft guidance	 Draft Guidance on Iloperidone 2010.pdf																						
Summary of OGD or DB History	Approved ANDAs:	None (as per Electronic Orange Book search as of 02/29/2016)																					
	Pending ANDAs	<table border="1"> <thead> <tr> <th>ANDA #</th> <th>Firm</th> <th>Pending Date</th> </tr> </thead> <tbody> <tr> <td colspan="3" style="text-align: right;">(b) (4)</td> </tr> <tr> <td>207231</td> <td>Inventia (Current)</td> <td>05/21/2014</td> </tr> <tr> <td>206890</td> <td>Lupin</td> <td>02/16/2016</td> </tr> </tbody> </table> <p>Three ANDAs received Complete Response:</p> <table border="1"> <thead> <tr> <th>ANDA #</th> <th>Firm</th> <th>Status Date</th> </tr> </thead> <tbody> <tr> <td>207409</td> <td>ALEMBIC</td> <td>09/22/2015</td> </tr> <tr> <td>207098</td> <td>TARO</td> <td>10/26/2015</td> </tr> </tbody> </table> <p style="text-align: right;">(b) (4)</p>	ANDA #	Firm	Pending Date	(b) (4)			207231	Inventia (Current)	05/21/2014	206890	Lupin	02/16/2016	ANDA #	Firm	Status Date	207409	ALEMBIC	09/22/2015	207098	TARO	10/26/2015
	ANDA #	Firm	Pending Date																				
	(b) (4)																						
207231	Inventia (Current)	05/21/2014																					
206890	Lupin	02/16/2016																					
ANDA #	Firm	Status Date																					
207409	ALEMBIC	09/22/2015																					
207098	TARO	10/26/2015																					
Protocols ⁵	None																						
Pending Citizen Petitions and other legal and	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No																						

⁴ OGD Controls (Correspondence) Document Tracking <http://cdsogd1/controls/DOC.ASP>, search for 'iloperidone', last accessed 2/26/2016

⁵ OGD - Division of Bioequivalence Protocols Tracking <http://fdswv04385/seltrack/Protocols.asp>, search for 'iloperidone', last accessed 2/29/2016

	regulatory issues. ⁶ If yes, please comment.	
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3.4 Pre-Study Bioanalytical Method Validation

Information Requested	Analyte: Iloperidone	
Bioanalytical method validation report location	Module 5.3.1.4, page 158 of 1493	
Analyte	Iloperidone	
Internal standard (IS)	Iloperidone D3	
Method description	Liquid chromatographic method using mass detector with Liquid-Liquid Extraction	
Limit of quantitation	19.796 pg/mL	
Recovery of drug at each QC (%CV)	85.2% HQC: 82.4% (6.3%) MQC: 85.1% (3.4%) LQC: 88.1% (3.2%)	
Average recovery of IS (%)	91.5% (4.3%)	
Standard curve concentrations (pg/mL)	19.796 to 5022.510 pg/mL	
QC concentrations (pg/mL)	HQC - 4295.653 pg/mL MQC - 2147.826 pg/mL LQC - 56.917 pg/mL LOQ QC - 19.921 pg/mL	
	HQC, MQC, LQC	LOQ QC
QC Intraday precision range (%)	1.9% - 5.0%	9.7%
QC Intraday accuracy range (%)	95.3% - 99.4%	101.8%
QC Interday precision range (%)	3.4% - 5.1%	12.6%
QC Interday accuracy range (%)	94.0% - 96.4%	99.8%
Extended P&A precision	2.3% - 5.7%	13.5%
Extended P&A accuracy	96.5% - 97.9%	112.0%
Reinjection reproducibility precision	1.7% - 3.9%	5.8%
Reinjection reproducibility accuracy	94.4% - 96.9%	97.1%
Reinjection reproducibility	35 hours 49 minutes	
Bench-top stability (hrs)	06 hours 37 minutes at 24 ± 4°C	
Short term stock solution stability	Iloperidone– 06Hours 54 Minutes at 24 ± 4°C Iloperidone d ₃ – 07 Hours 22 Minutes at 24 ± 4°C Iloperidone d ₃ Dilution – 07 Hours 44 Minutes at 24±4°C	
Long term stock solution stability	Iloperidone – 79 days at 2-8°C Iloperidone d ₃ – 79 days at 2-8°C	

⁶ DLRS policy updates, OGD Policy Alert List as of 02/26/2016, <http://sharepoint.fda.gov/orgs/CDER-OGD/OGDP/DLRS/SitePages/Home.aspx>

Intermediate term stability	05 days 15 hours 36 minutes at $-20 \pm 10^{\circ} \text{C}$
Processed stability	Post extract stability - 09 hours 05 minutes at $24 \pm 4^{\circ} \text{C}$
	Dry extract stability – 33 hours 07 minutes at $2 - 8^{\circ} \text{C}$
	Autosampler stability - 04 days 14 hours 05 minutes at $10 \pm 1^{\circ} \text{C}$
Calibration curve stability	05 days 15 hours 25 minutes at $-70 \pm 20^{\circ} \text{C}$
Freeze-thaw stability	FT – VI Cycles
Long term matrix storage stability (days)	77 days at $-70 \pm 20^{\circ} \text{C}$
Whole blood stability	02 hours 20 minutes at $24 \pm 4^{\circ} \text{C}$
Dilution integrity	1/2 nd - Precision – 2.1% 1/2 nd - Accuracy – 100.9% 1/5 th - Precision – 0.5% 1/5 th - Accuracy – 106.9%
Matrix effect (ISTD normalized matrix factor)	Precision HQC – 1.0% Precision LQC – 2.7%
Selectivity and Specificity	No significant Interference was observed at the retention time of Analyte and ISTD with respect to aqueous and extracted LOQ.
Auto sampler carry over test	Carry over was not observed for Iloperidone and Iloperidone D3 with respect to aqueous and extracted samples.

Information Requested	Analyte: Metabolite P88	
Bioanalytical method validation report location	Module 5.3.1.4, page 159 of 1493	
Analyte	Iloperidone Metabolite P88	
Internal standard (IS)	Iloperidone D3 Metabolite P88	
Method description	Liquid chromatographic method using mass detector with Liquid-Liquid Extraction	
Limit of quantitation	19.786 pg/mL	
Recovery of drug at each QC (%CV)	89.4% HQC: 83.4% (7.5%) MQC: 91.1 % (4.1%) LQC: 93.7% (3.7%)	
Average recovery of IS (%)	94.6% (5.3%)	
Standard curve concentrations (pg/mL)	19.786 to 5019.930 pg/mL	
QC concentrations (pg/mL)	HQC - 4294.937 pg/mL MQC - 2147.469 pg/mL LQC - 56.908 pg/mL LOQ QC - 19.918 pg/mL	
	HQC, MQC, LQC	LOQ QC
QC Intraday precision range (%)	1.9% - 3.6%	5.0%
QC Intraday accuracy range (%)	95.2% - 99.4%	103.9%
QC Interday precision range (%)	4.0% - 4.6%	6.4%

QC Interday accuracy range (%)	92.4% - 95.5%	98.0%
Extended P&A precision	2.1% -3.5%	5.0%
Extended P&A accuracy	94.4% - 97.2%	103.5%
Reinjection reproducibility precision	1.0% - 2.9%	3.1%
Reinjection reproducibility accuracy	93.2% - 97.1%	97.4%
Reinjection reproducibility	35 hours 49 minutes	
Bench-top stability (hrs)	06 hours 37 minutes at 24 ± 4°C	
Short term stock solution stability	Iloperidone Metabolite P88– 07 hours 06 minutes at 24 ± 4°C Iloperidone D3 Metabolite P88– 07 hours 30 minutes at 24 ± 4°C Iloperidone D3 Metabolite P88 Dilution – 07 hours 44 minutes at 24 ± 4°C	
Long term stock solution stability	Iloperidone Metabolite P88– 79 days at 2-8°C Iloperidone D3 Metabolite P88 – 79 days at 2-8°C	
Intermediate term stability	05 days 15 hours 36 minutes at -20 ± 10° C	
Processed stability	Post extract stability - 09 hours 05 minutes at 24 ± 4°C	
	Dry extract stability – 33 hours 07 minutes at 2 – 8°C	
	Autosampler stability - 04 days 14 hours 05 minutes at 10 ± 1°C	
Calibration curve stability	05 days 15 hours 25 minutes at -70 ± 20° C	
Freeze-thaw stability	FT – VI Cycles	
Long term matrix storage stability (days)	77 days at -70 ± 20° C	
Whole blood stability	03 hours 25 minutes at 24 ± 4°C	
Dilution integrity	(b) (4)	
Matrix effect (ISTD normalized matrix factor)	Precision HQC – 1.2% Precision LQC – 2.3%	
Selectivity and Specificity	No significant Interference was observed at the retention time of Analyte and ISTD with respect to aqueous and extracted LOQ.	
Auto sampler carry over test	Carry over was not observed for Iloperidone Metabolite P88 and Iloperidone D3 Metabolite P88 with respect to aqueous and extracted samples.	

SOP for bioanalytical method validation submitted?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is the same anticoagulant used in the pre-method validation study and BE sample analysis? If not, was cross validation study conducted?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No K ₂ EDTA was used.
Does the duration of the each of the LTSS stability parameters support the sample preparation/assay duration and clinical study sample storage temperature?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Was the % recovery consistent across QC concentrations?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Was the pre-study validation of the bioanalytical method used for the pivotal bioequivalence studies acceptable?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Comments on the Pre-Study Method Validation: Adequate

3.5 In Vivo Studies

Iloperidone

Iloperidone											
Study Ref. No.	Study Objective	Study Design	Treatments (Dose, Dosage Form, Route) [Product ID]	Subjects No. (M/F) Type Age: mean (Range)	*Mean Parameters ± SD (%CV)						Study Report Location
					C _{max} (pg/mL)	T _{max} (hr)	AUC _{0-t} (pg*h/mL)	AUC _{0-∞} (pg*h/mL)	T _{1/2} (hr)	K _{el} (hr ⁻¹)	
H216-12	To determine the single-dose oral BE of Iloperidone Tablets (2x1 mg) of Inventia Healthcare Pvt Ltd., India and Fanapt® iloperidone tablets (2x1 mg) Distributed by: Novartis Pharmaceuticals Corporation East Hanover, NJ 07936 in normal, healthy, adult, human subjects under fasting condition.	A randomized, open label, balanced, two-treatment, two-sequence, two-period, single-dose, crossover, pivotal oral BE study in normal, healthy, adult, human subjects under fasting condition	Test Product-T: Dose: 2x1 mg Iloperidone Tablets 1 mg Batch No: EXB/618/01 Route: Oral	Participated Subjects: 52 Mean age: 26.4 (18-39) Clinical Phase Completed Subjects: 46 Mean age: 26.3 (18-39)	1454.005 ± 717.6113 (49.4)	2.00 (1.00-8.00)	24314.631 ± 15188.1757 (62.5)	26828.039 ± 17120.8854 (63.8)	39.16 ± 27.265 (69.6)	0.0218 ± 0.00735 (33.8)	5.3.1.2 Study Report
			Reference Product-R: Dose: 2x1 mg Fanapt® iloperidone tablets 1 mg Lot No.: FFZN Route: Oral	1435.642 ± 604.2334 (42.1)	2.00 (1.00-5.00)	23812.828 ± 14329.3961 (60.2)	26240.686 ± 16268.1304 (62.0)	36.20 ± 17.192 (47.5)	0.0217 ± 0.00626 (28.9)		

Iloperidone											
Study Ref. No.	Study Objective	Study Design	Treatments (Dose, Dosage Form, Route) [Product ID]	Subjects No. (M/F) Type Age: mean (Range)	*Mean Parameters ± SD (%CV)						Study Report Location
					C _{max} (pg/mL)	T _{max} (hr)	AUC _{0-t} (pg*h/mL)	AUC _{0-∞} (pg*h/mL)	T _½ (hr)	K _{el} (hr ⁻¹)	
H217-12	To determine the single-dose oral BE of Iloperidone Tablets (2x1 mg) of Inventia Healthcare Pvt Ltd., India and Fanapt® iloperidone tablets (2x1 mg) Distributed by: Novartis Pharmaceutica ls Corporation East Hanover, NJ 07936 in normal, healthy, adult, human subjects under fed condition.	A randomized, open label, balanced, two-treatment, two-sequence, two-period, single-dose, crossover, pivotal oral BE study in normal, healthy, adult, human subjects under fed condition	Test Product-T: Dose: 2x1 mg Iloperidone Tablets 1 mg Batch No: EXB/618/01 Route: Oral	Participated Subjects: 72 Mean age: 26.0 (18-41) Clinical Phase Completed Subjects: 66 Mean age: 26.0 (18-41)	1334.769 ± 525.7495 (39.4)	4.50 (1.00-8.00)	25704.144 ± 8568.1268 (33.3)	27726.391 ± 9245.5463 (33.3)	33.24 ± 14.357 (43.2)	0.0232 ± 0.00647 (27.9)	5.3.1.2 Study Report
			Reference Product-R: Dose: 2x1 mg Fanapt® iloperidone tablets 1 mg Lot No.: FFZN Route: Oral	1470.085 ± 680.8210 (46.3)	3.50 (1.00-6.00)	26060.606 ± 8968.9459 (34.4)	28258.687 ± 9663.6364 (34.2)	34.35 ± 13.513 (39.3)	0.0227 ± 0.00705 (31.0)		

* Arithmetic mean ± SD (CV %) except for Tmax for which the median (range) are reported.

Active Metabolite P88

Iloperidone active P88 metabolite											
Study Ref. No.	Study Objective	Study Design	Treatments (Dose, Dosage Form, Route) [Product ID]	Subjects No. (M/F) Type Age: mean (Range)	*Mean Parameters ± SD (%CV)						Study Report Location
					C _{max} (pg/mL)	T _{max} (hr)	AUC _{0-t} (pg*h/mL)	AUC _{0-∞} (pg*h/mL)	T _{1/2} (hr)	K _{el} (hr ⁻¹)	
H216-12	To determine the single-dose oral BE of Iloperidone Tablets (2x1 mg) of Inventia Healthcare Pvt Ltd., India and Fanapt® iloperidone tablets (2x1 mg) Distributed by: Novartis Pharmaceuticals Corporation East Hanover, NJ 07936 in normal, healthy, adult, human subjects under fasting condition.	A randomized, open label, balanced, two-treatment, two-sequence, two-period, single-dose, crossover, pivotal oral BE study in normal, healthy, adult, human subjects under fasting condition	Test Product-T: Dose: 2x1 mg Iloperidone Tablets 1 mg Batch No: EXB/618/01 Route: Oral	Participated Subjects: 52 Mean age: 26.4 (18-39) Clinical Phase Completed Subjects: 46 Mean age: 26.3 (18-39)	2040.613 ± 979.4973 (48.0)	3.50 (1.00-24.00)	51272.281 ± 18174.1347 (35.4)	58157.615 ± 20049.8178 (34.5)	43.51 ± 11.605 (26.7)	0.0171 ± 0.00476 (27.9)	5.3.1.2
			Reference Product-R: Dose: 2x1 mg Fanapt® iloperidone tablets 1 mg Lot No.: FFZN Route: Oral	1971.347 ± 927.9333 (47.1)	2.50 (1.50-8.00)	50971.265 ± 18704.2567 (36.7)	58500.694 ± 21276.6667 (36.4)	47.37 ± 13.753 (29.0)	0.0159 ± 0.00520 (32.7)		

Iloperidone active P88 metabolite											
Study Ref. No.	Study Objective	Study Design	Treatments (Dose, Dosage Form, Route) [Product ID]	Subjects No. (M/F) Type Age: mean (Range)	*Mean Parameters ± SD (%CV)						Study Report Location
					C _{max} (pg/mL)	T _{max} (hr)	AUC _{0-t} (pg*h/mL)	AUC _{0-∞} (pg*h/mL)	T _{1/2} (hr)	K _{el} (hr ⁻¹)	
H217-12	To determine the single-dose oral BE of Iloperidone Tablets (2x1 mg) of Inventia Healthcare Pvt Ltd., India and Fanapt® iloperidone tablets (2x1 mg) Distributed by: Novartis Pharmaceutica ls Corporation East Hanover, NJ 07936 in normal, healthy, adult, human subjects under fed condition.	A randomized, open label, balanced, two-treatment, two-sequence, two-period, single-dose, crossover, pivotal oral BE study in normal, healthy, adult, human subjects under fed condition	Test Product-T: Dose: 2x1 mg Iloperidone Tablets 1 mg Batch No: EXB/618/01 Route: Oral	Participated Subjects: 72 Mean age: 26.0 (18-41) Clinical Phase Completed Subjects: 66 Mean age: 26.0 (18-41)	2142.015 ± 621.1127 (29.0)	5.25 (1.50 – 10.00)	66668.958 ± 19274.3803 (28.9)	76375.016 ± 22072.3831 (28.9)	45.67 ± 15.007 (32.9)	0.0166 ± 0.00467 (28.2)	5.3.1.2
			Reference Product-R: Dose: 2x1 mg Fanapt® iloperidone tablets 1 mg Lot No.: FFZN Route: Oral	2205.832 ± 548.3602 (24.9)	4.50 (1.00 – 8.03)	67645.683 ± 17937.9683 (26.5)	77588.357 ± 22152.9600 (28.6)	44.96 ± 11.987 (26.7)	0.0164 ± 0.00381 (23.3)		

* Arithmetic mean ± SD (CV %) except for Tmax for which the median (range) are reported.

3.6 OSIS Status (if applicable)

A. Clinical Site

Clinical Site Name		Clinical Pharmacology Unit GVK BIOSCIENCES PVT. LTD.								
Clinical Site Address		1st& 7th Floor, Swarna Jayanthi Commercial Complex Ameerpet, Hyderabad – 500 038, India.								
Clinical Study Dates		10/24/2013 – 1/3/2014								
Application (ANDA/NDA)	Inspected BE Study Type (In Vivo, In Vitro)	Inspection Type (Routine or For Cause)	EIR Report Date	Inspection Outcome (NAI, VAI, OAI)	Study dates of inspected clinical studies		Current ANDA clinical study dates		Were the current ANDA clinical studies conducted within 3.5 years of the inspected clinical studies? (Yes/No)	Conclusion (Relevant, Irrelevant)
					Start Date MM/DD/YY	End Date MM/DD/YY	Start Date MM/DD/YY	End Date MM/DD/YY		
ANDA 204901	In Vivo	Routine	1/29/2015	VAI	9/10/2011	9/22/2011	10/24/2013	1/3/2014	Yes	Relevant
ANDA 204504	In Vivo	Routine	2/4/2015	VAI	8/8/2012	8/18/2012	10/24/2013	1/3/2014	Yes	Relevant

NAI: No Action Indicated; VAI: Voluntary Action Indicated; OAI: Official Action Indicated.

B. Analytical Site

Analytical Site Name		(b) (4)								
Analytical Site Address		(b) (4)								
Analytical Study Dates		(b) (4)								
Application (ANDA/NDA)	Inspected BE Study Type (In Vivo, In Vitro)	Inspection Type (Routine or For Cause)	EIR Report Date	Inspection Outcome (NAI, VAI, OAI)	Study dates of inspected clinical studies		Current ANDA clinical study dates		Were the current ANDA clinical studies conducted within 3.5 years of the inspected clinical studies? (Yes/No)	Conclusion (Relevant, Irrelevant)
					Start Date MM/DD/YY	End Date MM/DD/YY	Start Date MM/DD/YY	End Date MM/DD/YY		
ANDA 204901	In Vivo	Routine	(b) (4)	VAI	(b) (4)					
ANDA 204504	In Vivo	Routine	(b) (4)	VAI	(b) (4)					

NAI: No Action Indicated; VAI: Voluntary Action Indicated; OAI: Official Action Indicated.

Reviewer’s Comments

The OSIS conducted routine inspections of the clinical site and the analytical site (b) (4) during (b) (4) for the clinical and analytical portions of the studies under ANDA 204901 and ANDA 204504. Following the inspection, Form FDA-483 was issued. The final classification was VAI (Voluntary Action Indicated) for both clinical and analytical sites. The inspection report was finalized at GDRP ANDA-204901-ORIG-1⁷ and ANDA-204504-ORIG-1-AMEND-10⁸.

Form FDA-483 study specific and general observations are provided below along with the conclusions per reviewer from Division of Generic Drug Bioequivalence Evaluation (DGDBE) within the OSIS.

⁷ GDRP ANDA-204901-ORIG-1, <http://panorama.fda.gov/project/view?ID=5420f38500051ce6ce04bdd6866e1df0>, completion date (b) (4)

⁸ GDRP ANDA-204504-ORIG-1-AMEND-10, <http://panorama.fda.gov/project/view?ID=5491d5550023ccc616992fce3074f7ed>, completion date (b) (4)

Current Reviewer's Comment:

Per the DGDBE reviewer, the firms' written response to above mentioned observations 2(a), 2(b), and 3 are acceptable. The observed condition did not impact subject safety or data integrity in studies under inspection. No significant discrepancies had been found between the un-archived records and reports. The observation 1 did not directly affect the 4 studies under audit. DGDBE reviewer recommended that the data for studies under audit be accepted for further agency review.

The current reviewer agrees with the DGDBE reviewer that the nature of the FDA-483 observations may potentially affect the overall record and data integrity. The current reviewer checked the application and study data cautiously per the above OSIS recommendation. After verification of the study data, no conduct issues and data integrity deficiencies were identified by the reviewer. The reviewer considers that the observations noted for ANDA 204901 and ANDA 204504 do not impact the study outcome in the current application NDA 207231.

4 APPENDIX

4.1 Individual Study Reviews

4.1.1 Single-dose Fasting Bioequivalence Study

4.1.1.1 Study Design

4.1.1.1.1 Study Information

Study Number	H216-12
Study Title	Open label, balanced, randomized, two-treatment, two-sequence, two-period, single-dose, crossover pivotal oral bioequivalence study of Iloperidone Tablets (2x1 mg) of Inventia Healthcare Pvt Ltd., India and Fanapt® iloperidone tablets (2x1 mg) (b) (4) Distributed by: Novartis Pharmaceuticals Corporation East Hanover, NJ 07936 in normal, healthy, adult, human subjects under fasting condition.
Clinical Site (Name & Address)	Clinical Pharmacology Unit GVK BIOSCIENCES PVT. LTD. 1 st & 7 th Floor, Swarna Jayanthi Commercial Complex Ameerpet, Hyderabad – 500 038, India. Phone No.: +91-40-6627-5555 Fax No.: +91-40-6627-5599
Principal Clinical Investigator	Dr. Ch. Nagaratnam, MD nagaratnam.chitibomma@gvkbio.co Dr. Naveen Govikar, MBBS naveen.govikar@gvkbio.com
Dosing Dates	Period 01: 16 Dec 2013 Period 02: 03 Jan 2014
Analytical Site (Name & Address)	(b) (4)
Analysis Dates	
Principal Analytical Investigator	
Sample Storage : (a) Duration (no. of days from the first day of sample collection to the last day of sample analysis) (b) Temperature Range (e.g., -20°C to -80°C)	54 days (Iloperidone) 55 days (Iloperidone Metabolite P88) -70 ± 20°C
Long-Term Storage Stability (LTSS) Coverage (no. days @ temp °C)	Iloperidone: 79 days @ -2 to 8°C Iloperidone Metabolite P88: 79 days @ -2 to 8°C

4.1.1.1.2 Product (Bio-batch) Information

Product	Test	RLD
Treatment ID	T	R
Product Name	Iloperidone Tablets 1 mg	Fanapt® (iloperidone) tablets 1 mg
Manufacturer	Inventia Healthcare Pvt Ltd	(b) (4)
Distributed by	—	Novartis Pharmaceuticals Corporation East Hanover, NJ 07936
Batch/Lot No.	EXB/618/01	FFZN
Manufacture Date	Jul 2013	NAV
Expiration Date	Jun. 2015	APR 2014
Strength	1 mg	1 mg
Dosage Form	Tablets	Tablets
Bio-Batch Size	(b) (4)	N/A
Production Batch Size	(b) (4)	N/A
Potency (Assay)	99.7 %	97.4 %
Content Uniformity (expressed as AV per USP)	3.20	5.02
Dose Administered	1 mg x 2 tablet	1 mg x 2 tablet
Route of Administration	Oral	Oral

Are the test and reference products expired at the time of study? If Yes, please comment	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Is same bio-batch used in the dissolution and all BE studies? If No, please comment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is the bio-batch size at least the recommended minimum of 100K or 10% of the production batch (whichever is greater) for oral solid dosage form? If No, please comment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is difference of the potency values for the Test and RLD within 5%? If No, please comment	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

4.1.1.1.3 Study Design, Single-Dose Fasting Bioequivalence Study

Number of Subjects	Enrolled: 52 (with two additional subjects (b) (6)) Dosed: 52 in Period I ¹⁰ , 46 in Period II ¹¹ Completed: 46 Samples Analyzed: 46 Statistically Analyzed: 46	
No. of Sequences	2 (sequence 1 TR; sequence 2 RT)	
No. of Periods	2	
No. of Treatments	2	
No. of Groups	1	
Washout Period	18 days	
Randomization	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Blood Sampling Times	Twenty two blood samples were collected from each subject during each period at pre-dose (0.00) and at 0.50, 1.00, 1.50, 2.00, 2.50, 3.00, 3.50, 4.00, 4.50, 5.00, 6.00, 8.00, 10.00, 12.00, 16.00, 24.00, 36.00, 48.00, 72.00, 96.00 and 120.00 hours after dosing.	
IRB Approval	<input checked="" type="checkbox"/> Yes Date: Protocol- approved 24 Sep 2013, Amendment No.: 01- approved 12 Dec 2013	<input type="checkbox"/> No
Informed Consent	<input checked="" type="checkbox"/> Yes Date: Subjects willing to participate in the study underwent a screening procedure within the 28 days prior to dose administration in Period 01. Written informed consent for the screening procedure was obtained from each subject. The subjects found eligible for participation in the study underwent a study specific informed consent presentation on the day of check-in for Period 01. <input type="checkbox"/> No	
Length of Fasting	Overnight fast of at least 10 hours	
Length of Confinement	In both the study periods, subjects were housed at the clinical facility from not less than 10.5 hours pre-dose till 48 hours post-dose.	
Was the drug product administered per labeling (for specialized dosage forms e.g. ODT)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Safety Monitoring	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

Comments on Study Design: Adequate

¹⁰ Subjects No. (b) (6) withdrew consent on their accord in person prior to period I dosing, hence were replaced with Subjects (b) (6) who were later allotted Subjects No. (b) (6) respectively.

¹¹ Subjects No. (b) (6) were withdrawn from the study in Period I due to AEs. Subjects No. (b) (6) did not report to the facility for period II checked in.

4.1.1.2 Clinical Results

4.1.1.2.1 Demographic Profile of Subjects

		Fasting Bioequivalence Study No. H216-12	
		Treatment Groups	
		Test Product N = 46	Reference Product N = 46
Age (years)	Mean ± SD	26.3 ± 5.12	26.3 ± 5.12
	Range	18-39	18-39
Age Groups	< 18	0	0
	18 – 40	46 (100.0 %)	46 (100.0 %)
	41 – 64	0	0
	65 – 75	0	0
	> 75	0	0
Sex	Male	46 (100.0%)	46 (100.0%)
	Female	0 (0%)	0 (0%)
Race	Asian	0	0
	Black	0	0
	Caucasian	46 (100.0%)	46 (100.0%)
	Hispanic	0	0
	Other	0	0
BMI	Mean ± SD	22.05 ± 1.979	22.05 ± 1.979
	Range	18.6 – 24.8	18.6 – 24.8
Other Factors		NA	NA

Is the demographics profile of subjects completing the bioequivalence study in agreement with the current drug product recommendation? If no, please comment.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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4.1.1.2.2 Dropout Information

Study No. H216-12					
Subject Number	Reason for Dropout/Replacement	Period	Time (hrs) & Date of dropout	Treatment Missed	Replaced?
(b) (6)	Subject withdrawn from the study due to AE (upper abdominal discomfort & vomiting).	01 In-house	13:35 (b) (6)	R	No
	Subject had an episode of vomiting. Hence withdrawn from the study	01 In-house	10:09 (b) (6)	T	No

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(b) (6)	Subject did not report to the facility for period 02; hence considered as drop-outs.	02 Check-in	NA (b) (6)	T	No
	Subject withdrawn from the study due to AE (upper abdominal discomfort & vomiting).	01 Wash-out	08:35 (b) (6)	T	No
	Subject did not report to the facility for period 02; hence considered as drop-outs.	02 Check-in	NA (b) (6)	R	No
	Subject withdrawn from the study due to AE (loose stools).	01 Wash-out	18:45 (b) (6)	T	No

Reviewer's Notes: Subjects No. (b) (6) withdrew consent on their accord in person prior to period I dosing. These two subjects were replaced with Subjects (b) (6), who were later allotted as Subjects No (b) (6) respectively. This was acceptable.

Are dropouts appropriate? If no, please comment.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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4.1.1.2.3 Study Adverse Events

Body System / Adverse Event	Reported Incidence by Treatment Groups		
	Fasting Bioequivalence Study No. H216-12		
	Test (T) N=48	Reference (R) N=50	NA# N=52
Nervous system disorders			
Dizziness	05 (10.4%)	06 (12.0%)	-
Gastrointestinal disorders			
Upper Abdominal discomfort	01 (2.1%)	01 (2.0%)	-
Vomiting	01 (2.1%)	02 (4.0%)	-
Nausea	-	03 (6.0%)	-
Loose stools	-	01 (2.0%)	-
Injury, poisoning and procedural complications			
Injury left elbow		-	01 (1.9%)
Investigations			
Absolute Eosinophil count increased	-	-	01 (1.9%)
Total	07 (14.6%)	13 (26.0%)	02 (3.8%)

NA# - clinically significant abnormal laboratory parameters evaluated during post study safety assessment, which could not be assigned to any one treatment.

Subjects Experiencing Emesis (Include in eCTD)

Subject Number	Test/Reference	Period	Time and Date of dosing	Time and Date of emesis	Duration Between Dosing and Start of Emesis (hours)
(b) (6)	T	01	All three subjects were dropped from the study due to AEs; therefore do not affect the study outcome.		
	R	01			
	R	01 (Wash-out)			

Were subjects who experienced vomiting included in statistical analysis?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
If yes, does the time of emesis exceed two times the median Tmax value (immediate release products) or the labeled dosing interval (modified release products)? Please comment.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Was the adverse event profile observed comparable for the test and reference product?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there any serious adverse events or death?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If yes, then if the study conducted in US, are they reported to the OGD Safety Committee?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Are there any other safety concerns based on the adverse event profile?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

4.1.1.2.4 Protocol Deviations

Study No.: H216-12		
Type	Subject #s (Test)	Subject #s (Ref.)
Sampling Time Point Protocol Deviations Period 01	(b) (6)	
Sampling Time Point Protocol Deviations Period 02		
Other Deviations:		
<u>Deviation in recording Audio-Video surveillance system:</u>		
As per protocol section 12.2, "The whole Informed Consent Process was to be done under Audio Video Surveillance". However, Informed Consent Obtaining was carried under Audio-Video surveillance system, but audio was not recorded.		
Reason for deviation: On the day of period 01 check-in dated on 15 Dec 2013 after reporting the volunteers being enrolled in to the study, obtaining informed consent process was carried out by under Audio-Video surveillance system. Later on while checking the data it was found that the audio of one of the interaction with volunteers was not recorded due to technical error.		
Impact analysis: There was no impact on the study out come and technical error in audio-video surveillance system was identified and rectified the same.		

If the firm used nominal time points, the sampling time deviations (if any) > 5% and 90% CI of any PK	<input checked="" type="checkbox"/> Actual <input type="checkbox"/> Nominal
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parameters is border line, please reanalyze data using actual sampling time	
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Is the dropout/withdrawal/exclusion of subjects and protocol deviations as per the criteria mentioned in the IRB approved study protocol?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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Comments on Clinical Results: Adequate

4.1.1.3 Bioanalytical Results

4.1.1.3.1 SOPs dealing with Sample Analysis including Repeat Analysis

SOP No.	Effective Date of SOP	SOP Title
(b) (4)		Repeat analysis
		Bioanalytical Method Validation
		Preparation, Distribution and Storage of CC Standards and QC Page 1 of 12 Samples
		Project Sample Analysis, Data Checkup and Acceptance Criteria
		Incurred sample reanalysis and reporting

All necessary SOPs submitted?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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4.1.1.3.2 Sample Analysis Calibration and Quality Control

Fasting Bioequivalence Study No. H216-12 Analyte Name- Iloperidone								
Parameter	Standard Curve Samples							
Standard IDs	STD 8	STD 7	STD 6	STD 5	STD 4	STD 3	STD 2	STD 1
Concentration (pg/mL)	19.846	56.541	282.706	1177.943	2141.715	3294.947	4393.262	5020.871
Inter day Precision (% CV)	2.0	5.5	3.6	2.8	1.7	1.7	2.5	2.7
Inter day Accuracy (% Bias)	0.0	0.6	-3.3	1.4	2.0	1.1	-2.3	0.5
Linearity (r ²)	0.994988 – 0.999618							
Linearity Range (pg/mL)	19.846 – 5020.871							
Sensitivity/LOQ (pg/mL)	19.846							

Analyte Name- Iloperidone				
Parameter	Quality Control Samples			
Quality Control Sample IDs	LQC	MQC	M2QC	HQC
Concentration (pg/mL)	57.442	499.493	1997.970	4251.001
Inter day Precision (% CV)	7.5	7.3	7.2	7.0

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Inter day Accuracy (% Actual)	100.1	102.3	103.4	102.8
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Fasting Bioequivalence Study No. H216-12 Analyte Name - Iloperidone metabolite P88								
Parameter	Standard Curve Samples							
Standard IDs	STD 8	STD 7	STD 6	STD 5	STD 4	STD 3	STD 2	STD 1
Concentration (pg/mL)	19.810	56.439	282.194	1175.810	2137.836	3288.979	4385.305	5011.777
Inter day Precision (% CV)	1.4	4.0	2.1	2.0	1.3	1.4	1.3	1.5
Inter day Accuracy (% Bias)	-0.2	0.7	-1.7	1.6	0.6	0.6	-1.9	0.2
Linearity (r ²)	0.998308 – 0.999878							
Linearity Range (pg/mL)	19.810 – 5011.777							
Sensitivity/LOQ (pg/mL)	19.810							

Analyte Name - Iloperidone metabolite P88				
Parameter	Quality Control Samples			
Quality Control Sample IDs	LQC	MQC	M2QC	HQC
Concentration (pg/mL)	57.284	498.125	1992.500	4239.362
Inter day Precision (% CV)	6.5	6.6	6.8	6.8
Inter day Accuracy (% Actual)	99.2	98.7	99.0	97.2

Are the concentrations of standard curve and QC samples relevant to the concentration of the samples?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there any concerns related to sample analysis (including rejected runs, reinjection, sample dilution, etc.)? If yes, comment below or consult TL/tertiary reviewer for additional actions	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Were 20% of chromatograms included?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were chromatograms serially or randomly selected?	<input checked="" type="checkbox"/> serially <input type="checkbox"/> randomly
Any interfering peaks in chromatogram?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Multiple peaks without interfering were observed in the chromatograms for analytes and ISTD.
Were the chromatograms submitted by the firm acceptable?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were 100% raw analytical data, including failed runs, provided?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

4.1.1.3.3 Reanalysis of Study Samples

Fasting Bioequivalence Study No. H216-12 Iloperidone Analytical Report Page No 135 of 136		
Reason why assay was repeated	Number of samples reanalyzed	Number of recalculated values used after reanalysis

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	Actual number		% of total assays		Actual number		% of total assays	
	T	R	T	R	T	R	T	R
Pharmacokinetic	00	00	0.000	0.000	00	00	0.000	0.000
ISTD variation	27	17	1.270	0.800	27	17	1.270	0.800
Total	27	17	1.270	0.800	27	17	1.270	0.800

Total No. of samples analyzed: 2126

Fasting Bioequivalence Study No. H216-12 Iloperidone metabolite P88 Analytical Report Page No 135 of 136								
Reason why assay was repeated	Number of samples reanalyzed				Number of recalculated values used after reanalysis			
	Actual number		% of total assays		Actual number		% of total assays	
	T	R	T	R	T	R	T	R
Pharmacokinetic	0	0	0.000	0.000	0	0	0.000	0.000
Value above upper limit of CC	2	0	0.094	0.000	2	0	0.094	0.000
ISTD variation	6	3	0.282	0.141	6	3	0.282	0.141
Total	8	3	0.376	0.141	8	3	0.376	0.141

Total No. of samples analyzed: 2126

Does the reviewer agree with the reanalysis of study samples: analytical and/or PK repeat?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If no, is recalculation of PK parameters necessary?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Did recalculation of PK parameters change the study outcome?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Are the PK parameters of reanalysis still within the acceptance limits for the 90% CI?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A

Comments on Bioanalytical Results: Adequate

4.1.1.4 Pharmacokinetic Results

4.1.1.4.1 Arithmetic Mean Pharmacokinetic Parameters - Reviewer-calculated

Fasting Bioequivalence Study No. H216-12 (Iloperidone)									
Parameter (units)	Test (n=46)				Reference (n=46)				T/R
	Mean	%CV	Min	Max	Mean	%CV	Min	Max	
AUC _{0-t} (hr*pg/ml)	24314.63	62.47	11075.76	88867.77	23812.83	60.18	10930.76	84796.25	1.02
AUC _∞ (hr*pg/ml)	26828.04	63.82	12040.91	98816.48	26240.69	62.00	11962.72	94780.94	1.02
C _{max} (pg/ml)	1454.005	49.35	402.75	3553.36	1435.642	42.09	401.68	3275.18	1.01
T _{max} * (hr)	2.000	.	1.00	8.00	2.000	.	1.00	5.00	1.00
Kel (hr ⁻¹)	0.022	34.18	0.00	0.04	0.022	28.86	0.01	0.03	1.00
T _{1/2} (hr)	39.162	69.62	17.81	161.54	36.202	47.49	21.23	119.83	1.08

* T_{max} values are presented as median, range

Fasting Bioequivalence Study No. H216-12 (P88)									
Parameter (units)	Test (n=46)				Reference (n=46)				T/R
	Mean	%CV	Min	Max	Mean	%CV	Min	Max	
AUC _{0-t} (hr*pg/ml)	51272.28	35.45	10465.30	103581.5	50971.27	36.70	9719.07	104632.9	1.01
AUC _∞ (hr*pg/ml)	58157.62	34.47	13888.93	115099.0	58500.69	36.37	12189.38	119522.9	0.99
C _{max} (pg/ml)	2040.613	48.00	379.92	5427.61	1971.347	47.07	405.89	4785.62	1.04
T _{max} * (hr)	3.500	.	1.00	24.00	2.500	.	1.50	8.00	1.40
Kel (hr ⁻¹)	0.017	27.89	0.01	0.03	0.016	32.80	0.01	0.04	1.08
T _{1/2} (hr)	43.512	26.67	23.42	76.83	47.372	29.03	17.42	90.18	0.92

* T_{max} values are presented as median, range

4.1.1.4.2 Geometric Means and 90% Confidence Intervals - Firm Calculated

Geometric Least Square Mean Ratios and 90% Confidence Interval of Iloperidone (N=46)

Parameter	Ln-transformed Geometric Least Square Mean		Ratio (T/R)%	90% Confidence Interval	
	Test (T)	Reference (R)		Lower	Upper
C _{max} (pg/mL)	1298.856	1307.874	99.31	89.73	109.92
AUC _{0-t} (pg.hr/mL)	21521.237	21198.302	101.52	98.09	105.08
AUC _{0-∞} (pg.hr/mL)	23742.490	23252.465	102.11	98.13	106.24

4.1.1.4.3 Geometric Means and 90% Confidence Intervals - Reviewer Calculated

Iloperidone Tablets (No of subjects completed = 46) Dose (2 × 1 mg) Least Squares Geometric Means, Ratio of Means, and 90% Confidence Intervals						
Fasting Bioequivalence Study No. H216-12 (Iloperidone)						
Parameter (units)	N	Test	RLD	Ratio	90% C.I.	
AUC _{0-t} (hr *pg/ml)	46	21521.24	21198.30	1.02	98.09	105.08
AUC _∞ (hr *pg/ml)	46	23742.49	23252.46	1.02	98.13	106.24
C _{max} (pg/ml)	46	1298.86	1307.87	0.99	89.73	109.92

Iloperidone Tablets (No of subjects completed = 46) Dose (2 × 1 mg) Least Squares Geometric Means, Ratio of Means, and 90% Confidence Intervals						
Fasting Bioequivalence Study No. H216-12 (P88)						
Parameter (units)	N	Test	RLD	Ratio	90% C.I.	
AUC _{0-t} (hr *pg/ml)	46	47740.49	47181.02	1.01	98.06	104.41
AUC _∞ (hr *pg/ml)	46	54400.06	54358.11	1.00	97.10	103.15
C _{max} (pg/ml)	46	1834.23	1767.49	1.04	97.92	109.98

4.1.1.4.4 Additional Information for the Study

Root Mean Square Error	<table border="1"> <thead> <tr> <th>Iloperidone</th> <th>Parameter</th> <th>RMSE</th> </tr> </thead> <tbody> <tr> <td></td> <td>LAUCT</td> <td>0.0981</td> </tr> <tr> <td></td> <td>LAUCI</td> <td>0.1133</td> </tr> <tr> <td></td> <td>LCMAX</td> <td>0.2894</td> </tr> </tbody> </table>	Iloperidone	Parameter	RMSE		LAUCT	0.0981		LAUCI	0.1133		LCMAX	0.2894
	Iloperidone	Parameter	RMSE										
	LAUCT	0.0981											
	LAUCI	0.1133											
	LCMAX	0.2894											
	<table border="1"> <thead> <tr> <th>P88</th> <th>Parameter</th> <th>RMSE</th> </tr> </thead> <tbody> <tr> <td></td> <td>LAUCT</td> <td>0.0895</td> </tr> <tr> <td></td> <td>LAUCI</td> <td>0.0862</td> </tr> <tr> <td></td> <td>LCMAX</td> <td>0.1655</td> </tr> </tbody> </table>	P88	Parameter	RMSE		LAUCT	0.0895		LAUCI	0.0862		LCMAX	0.1655
P88	Parameter	RMSE											
	LAUCT	0.0895											
	LAUCI	0.0862											
	LCMAX	0.1655											
Is there a T _{max} difference between Test and Reference? If yes, please provide brief explanation (or detailed explanation, including T _{max} analysis, for substantial difference)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No												
Were the subjects dosed in groups? If yes, was the statistical analysis proper? Is reanalysis by reviewer necessary?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No												
Are there measurable drug concentrations at 0 hr? If yes, please comment (and take necessary action, if needed)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No												

Are there first measurable drug concentration as C_{max}? If yes, please comment	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are there C_{max} at the first time point? If yes, is the study (sample) design adequate?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Ratio of AUC _{0-t} /AUC _∞ ¹² (Iloperidone)				
Treatment	n	Mean	Minimum	Maximum
Test	46	0.91	0.68	0.97
Reference	46	0.91	0.77	0.97
Ratio of AUC _{0-t} /AUC _∞ (p88)				
Treatment	n	Mean	Minimum	Maximum
Test	46	0.88	0.75	0.94
Reference	46	0.87	0.72	0.93
If the minimum ratios less than 0.8, were they due to inadequate sampling schedule? Provide additional comments below	<p>3 out of 46 subjects (b)(6) from test-treatment group and 1 out of 46 subjects (b)(6) from reference-treatment group showed ratio of AUC_t/AUC_∞ <u>for iloperidone</u> less than 0.80.</p> <p>4 out of 46 subjects (b)(6) from test-treatment group and 1 out of 46 (b)(6) subjects from reference-treatment group showed ratio of AUC_t/AUC_∞ <u>for metabolite p88</u> less than 0.80.</p>			

Comments on PK results:

1. Subject (b)(6) had measurable concentration for iloperidone at pre-dose (0 hr) in Period II (reference). The 0 h concentration of (b)(4) was (b)(4) than (b)(4)% of C_{max} (b)(4) for this subject in this period. Therefore the subject was not excluded.
2. There is a median T_{max} difference for the metabolite P88 between the test and reference product in the fasting study. The observed median T_{max} of the test P88 is 3.50 (range 1.00-24.00) hours versus 2.50 (range 1.50-8.00) hours for the reference product (T/R=1.40). The reviewer checked the individual PK data, the observed T_{max} for metabolite P88 ranges from 1.00-8.00 hours except for one subject, subject (b)(6) showed T_{max} as 24 hours. Similar T_{max} was also observed in other in-house ANDAs for P88 (please see the table below). Per RLD labeling this drug product is indicated for (b)(4) schizophrenia, the reviewer considered the observed T_{max} difference for P88 should not have a clinical impact on efficacy or safety. Therefore the T_{max} difference of metabolite P88 under fasting conditions is acceptable.

¹² See individual test to reference ratios of PK Parameters in SAS Output

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ANDA #	Fasting study		Fed study	
	T	R	T	R
206890	2.75 (1.50-6.00)	2.00 (1.00-4.00)	5.00 (2.00-10.00)	5.00 (2.00-8.00)
207098	3.75 (2.00-6.00)	3.50 (2.00-4.50)	5.50 (2.67-8.00)	5.50 (3.33-8.00)
207409	4.00 (2.00-8.00)	4.50 (1.00-8.00)	5.00 (4.00-12.00)	8.00 (4.00-12.00)
Current	3.50 (1.00-24.00)	2.50 (1.50-8.00)	5.25 (1.50- 10.00)	4.50 (1.00- 8.03)

3. A total of 4 subjects had AUC_t/AUC_∞ ratios below 0.8 for the parent drug, iloperidone. The mean AUC_t/AUC_∞ ratio for iloperidone is more than 0.9 for both test and reference products indicating that the sampling was carried out for a sufficient period of time.
4. The reviewer agrees with the firm's pharmacokinetic and statistical analysis. The 90% confidence intervals for the AUC_{0-t}, AUC_∞, and C_{max} geometric mean test/reference ratios for test iloperidone are within acceptable BE limits of 80-125%.
5. The PK parameters of the test and reference products for the active metabolite P88 were comparable in the fasting BE study. Therefore, the metabolite data are supportive.

The fasting BE study is **adequate**.

4.1.1.5 Overall Comment

Was the fasting bioequivalence study acceptable? Acceptable

Mean Plasma Concentrations, Single-Dose Fasting Bioequivalence Study

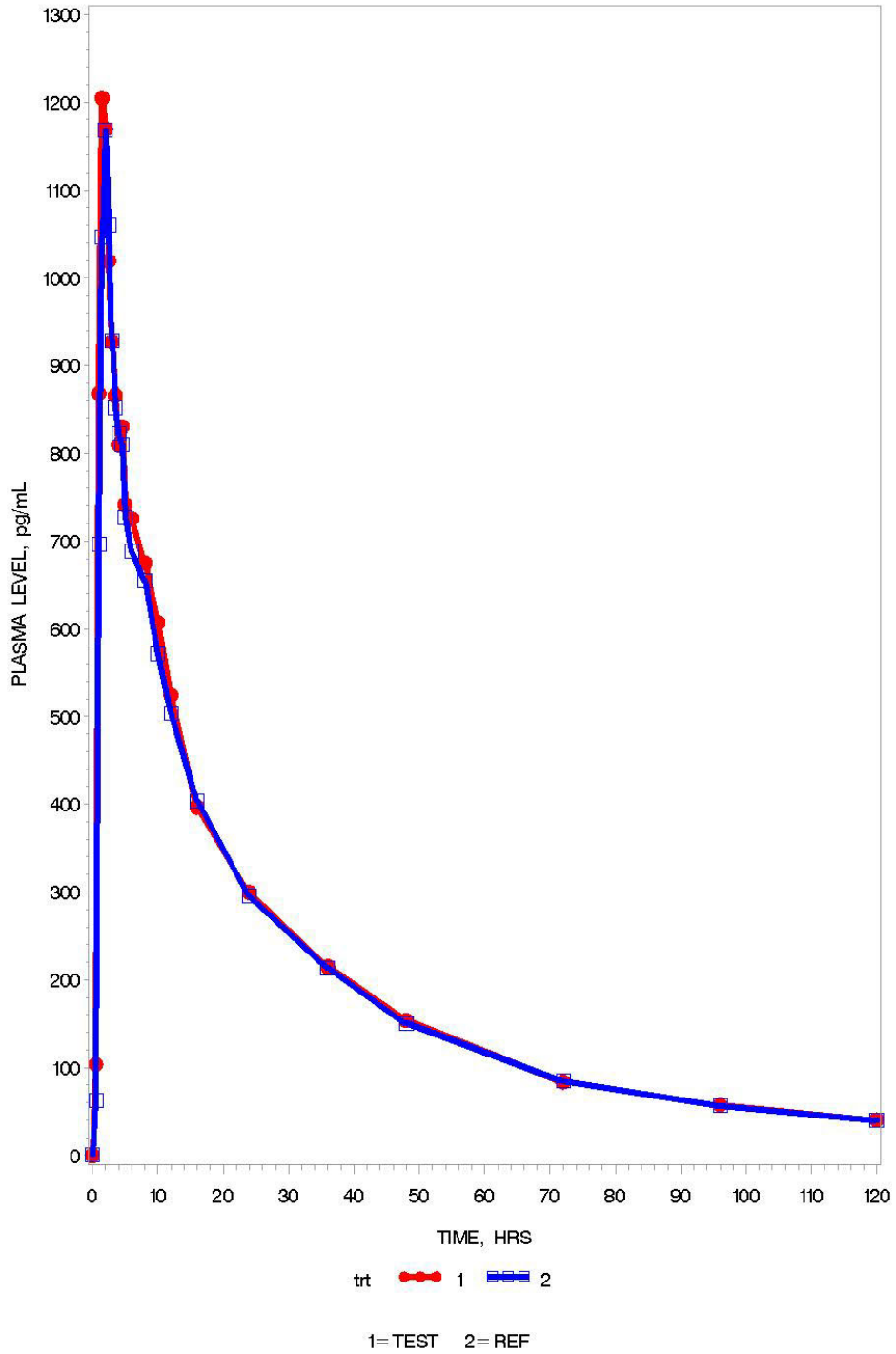
Iloperidone Tablets (Iloperidone)					
Dose (2 × 1 mg)					
Time (hr)	Test (n=46)		Reference (n=46)		T/R Ratio
	Mean (pg/mL)	% CV	Mean (pg/mL)	% CV	
0.00	0.00	.	0.51	678.23	0.00
0.50	103.82	87.31	62.83	90.86	1.65
1.00	868.40	76.15	696.10	73.87	1.25
1.50	1205.06	60.00	1046.45	53.01	1.15
2.00	1169.60	47.71	1167.82	42.88	1.00
2.50	1019.58	54.39	1060.43	57.42	0.96
3.00	927.39	55.65	928.32	52.18	1.00
3.50	865.73	60.32	852.23	52.04	1.02
4.00	809.82	56.90	822.96	55.87	0.98
4.50	830.43	57.28	810.01	53.05	1.03
5.00	741.74	52.20	726.26	51.98	1.02
6.00	725.93	58.27	688.58	52.31	1.05
8.00	675.08	59.10	654.70	57.46	1.03
10.00	607.12	60.79	571.31	55.53	1.06
12.00	524.33	67.94	503.70	60.48	1.04
16.00	396.86	63.28	404.04	66.11	0.98
24.00	299.59	68.61	295.01	68.30	1.02
36.00	215.07	64.40	213.79	64.62	1.01
48.00	153.88	66.97	150.59	68.68	1.02
72.00	83.82	80.59	84.56	78.05	0.99
96.00	57.70	79.80	56.51	83.92	1.02
120.00	40.53	88.88	40.35	87.23	1.00

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Iloperidone Tablets (Metabolite P88)					
Dose (2 × 1 mg)					
Time (hr)	Test (n=46)		Reference (n=46)		T/R Ratio
	Mean (pg/mL)	% CV	Mean (pg/mL)	% CV	
0.00	0.00	.	0.94	474.35	0.00
0.50	146.52	136.16	97.97	157.78	1.50
1.00	1094.07	105.44	897.56	110.04	1.22
1.50	1506.01	70.75	1361.54	75.67	1.11
2.00	1638.66	54.57	1593.44	56.25	1.03
2.50	1622.31	40.81	1665.97	45.57	0.97
3.00	1613.95	37.24	1562.67	42.71	1.03
3.50	1605.46	35.69	1578.16	39.61	1.02
4.00	1672.67	33.31	1644.12	37.73	1.02
4.50	1605.79	33.21	1607.62	36.77	1.00
5.00	1436.45	33.20	1405.57	35.26	1.02
6.00	1349.04	34.58	1364.15	38.89	0.99
8.00	1314.07	38.30	1287.57	36.30	1.02
10.00	1150.91	35.58	1127.04	36.75	1.02
12.00	1043.90	35.60	1028.88	34.77	1.01
16.00	813.79	36.41	814.00	37.74	1.00
24.00	728.48	37.03	733.76	37.10	0.99
36.00	458.39	38.85	458.23	41.11	1.00
48.00	342.75	38.31	338.36	40.99	1.01
72.00	216.11	38.68	212.60	43.81	1.02
96.00	144.57	38.65	149.23	43.34	0.97
120.00	107.29	40.35	107.87	40.39	0.99

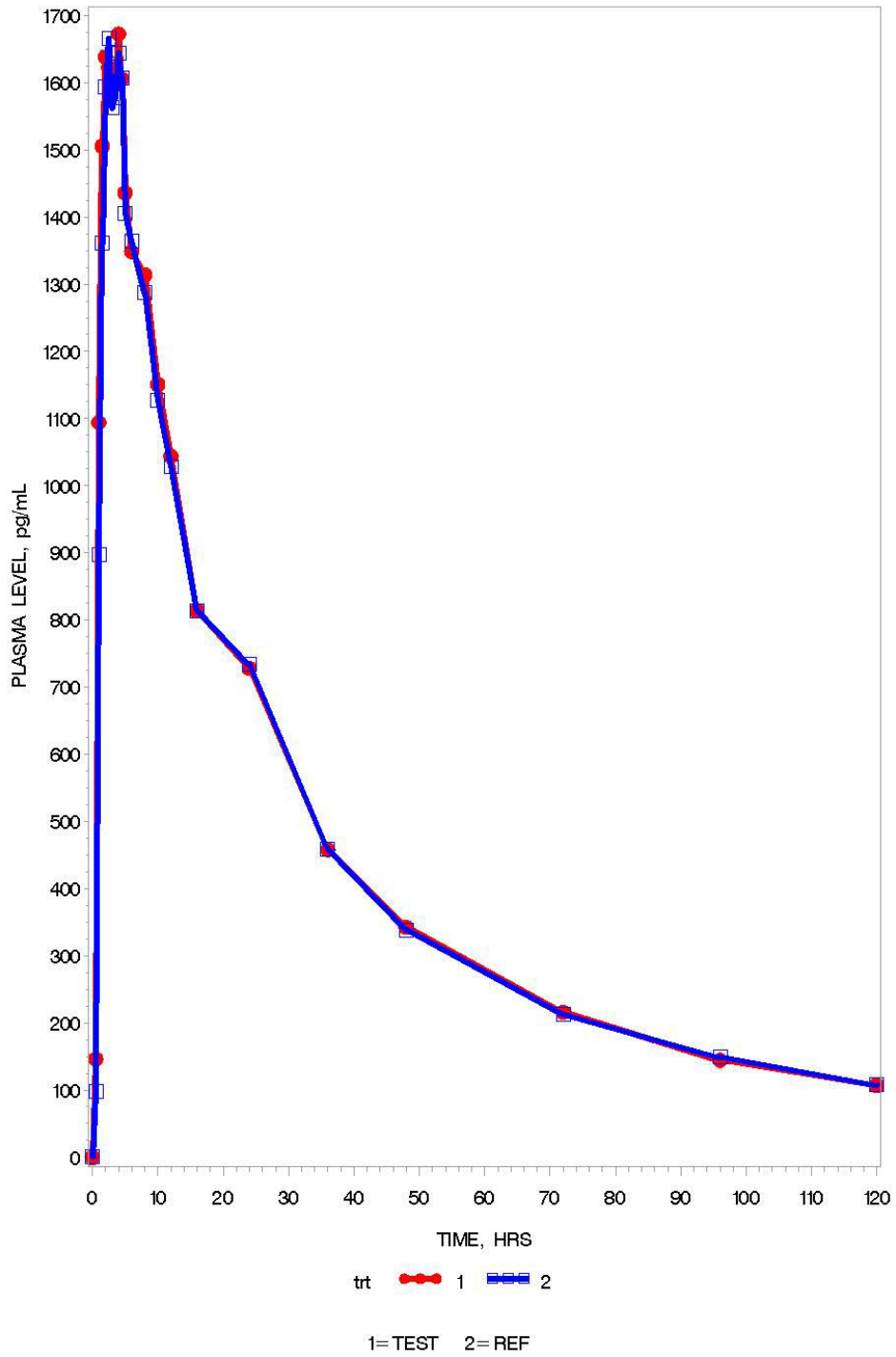
Mean Plasma Concentrations, Single-Dose Fasting Bioequivalence Study

PLASMA Iloperidone LEVELS
Iloperidone Tablets, ANDA 207231
UNDER FASTING CONDITIONS
DOSE= 2 x 1 mg



ANDA 207231
Single-Dose Fasting Bioequivalence Study Review (H216-12)

PLASMA Iloperidone LEVELS
Iloperidone Tablets, ANDA 207231
UNDER FASTING CONDITIONS
DOSE= 2 x 1 mg



4.1.2 Single-dose Fed Bioequivalence Study

4.1.2.1 Study Design

4.1.2.1.1 Study Information

Study Number	H217-12
Study Title	Open label, balanced, randomized, two-treatment, two-sequence, two-period, single-dose, crossover pivotal oral bioequivalence study of Iloperidone Tablets (2x1 mg) of Inventia Healthcare Pvt Ltd., India and Fanapt® iloperidone tablets (2x1 mg) (b) (4) Distributed by: Novartis Pharmaceuticals Corporation East Hanover, NJ 07936 in normal, healthy, adult, human subjects under fed condition.
Clinical Site (Name & Address)	Clinical Pharmacology Unit GVK BIOSCIENCES PVT. LTD. 1 st & 7 th Floor, Swarna Jayanthi Commercial Complex Ameerpet, Hyderabad – 500 038, India. Phone No.: +91-40-6627-5555 Fax No.: +91-40-6627-5599
Principal Clinical Investigator	Dr. Ch. Nagaratnam, MD nagaratnam.chitibomma@gvkbio.com Dr. T. Ajit Singh, MD General Medicine (UKr), PGDHSc in Diabetology ajitsingh.thakur@gvkbio.com
Dosing Dates	Period 01 : 24 Oct 2013 Period 02: 08 Nov 2013
Analytical Site (Name & Address)	(b) (4)
Analysis Dates	(b) (4)
Principal Analytical Investigator	(b) (4)
Sample Storage : (a) Duration (no. of days from the first day of sample collection to the last day of sample analysis) (b) Temperature Range (e.g., -20°C to -80°C)	72 days (Iloperidone) 75 days (Iloperidone Metabolite P88) -70 ± 20°C
Long-Term Storage Stability (LTSS) Coverage (no. days @ temp °C)	Iloperidone: 79 days @ -2 to 8° Iloperidone Metabolite P88: 79 days @ -2 to 8°C

4.1.2.1.2 Product Information

NA (Include only if product information is different from the fasting study.)

4.1.2.1.3 Study Design, Single-Dose Fed Bioequivalence Study

Number of Subjects	Enrolled: 74 (with two additional subjects (b) (6)) Dosed: 72 in Period I ¹³ , 66 in Period II ¹⁴ Completed: 66 Samples Analyzed: 72 Statistically Analyzed: 72 for PK analysis, 66 for BE evaluation	
No. of Sequences	2 (sequence 1 TR; sequence 2 RT)	
No. of Periods	2	
No. of Treatments	2	
No. of Groups	1	
Washout Period	15 days	
Randomization	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Blood Sampling Times	Twenty five blood samples were collected from each subject during each period at pre-dose (0.00) and at 0.50, 1.00, 1.50, 2.00, 2.50, 3.00, 3.50, 4.00, 4.50, 5.00, 5.50, 6.00, 6.50, 7.00, 8.00, 10.00, 12.00, 16.00, 24.00, 36.00, 48.00, 72.00, 96.00 and 120.00 hours after dosing.	
IRB Approval	<input checked="" type="checkbox"/> Yes Date: Protocol- approved 24 Sep 2013	<input type="checkbox"/> No
Informed Consent	<input checked="" type="checkbox"/> Yes Date: Written informed consent was obtained from each subject before screening and before enrolling in the study (before check-in for the first period i.e. on 23 Oct 2013). <input type="checkbox"/> No	
Length of Fasting	Fasted for at least 10 hours prior to a high fat breakfast. Dosing was done 30 minutes after the start of the breakfast.	
Length of Confinement	In both the study periods, subjects were housed at the clinical facility from not less than 11 hours pre-dose till 48 hours post-dose.	
Was the drug product administered per labeling (for specialized dosage forms e.g. ODT)?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Safety Monitoring	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

Standard FDA Meal Used?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If No, then meal components and composition is listed in the tables below	

¹³ Subject No. (b) (6) was withdrawn from the study prior to period I dosing due to AE, he was replaced with Subject (b) (6), who was later allotted Subject No. (b) (6)

¹⁴ Subjects No. (b) (6) were withdrawn from the study in Period I due to AEs. Subjects No. (b) (6) did not report to the facility for period II checked in.

Composition of Non-standard FDA Meal Used in Fed Bioequivalence Study					
Composition of Meal Used in Non Fasted Bioequivalence Study (Study No. H217-12)					
Composition	Percent of total Kcal	Kcal			
Protein	15.05	143.32			
Fat	55.60	529.56			
Carbohydrates	29.35	279.52			
Total Energy (Kcal)	100.00	952.40			
Components of Non-standard FDA Meal Used in Fed Bioequivalence Study H217-12					
Meal ID: H217/02		Meal Type: Fed breakfast			
S.No	Food Item	Portion Size (Cooked weight)			
1	Bread slice with butter	2 no.			
2	Fried chicken	¼ cup			
3	Egg	2 no.			
4	French Fries	1 cup			
5	Milk	1 glass			
Nutritive value of food items (Raw weight)					
S.No	Food item	Quantity (gm)/(ml)	Protein (Gram)	Fat (Gram)	Carbohydrates (Gram)
1	Wheat bread (white)	40	3.12	0.28	20.76
2	Chicken	50	12.95	0.30	0.00
3	Egg	80	10.64	10.64	0.00
4	Potato	120	1.92	0.12	27.12
5	Milk (Whole milk)	240	7.20	14.40	12.00
6	Sugar	10	0.00	0.00	10.00
7	Oil	25	0.00	25.00	0.00
8	Butter	10	0.00	8.10	0.00
Total			35.83	58.84	69.88
Energy (Kcal)			143.32	529.56	279.52
Total Energy (Kcal)			952.40		
Percentage of Caloric Content			15.05	55.60	29.35

Reviewer's Note: This information was taken from page 146 of the study report and page 55 of the study protocol.

Comments on Study Design: Adequate

4.1.2.2 Clinical Results

4.1.2.2.1 Demographic Profile of Subjects

Fed Bioequivalence Study No. H217-12		
	Treatment Groups	
	Test Product	Reference Product

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		N = 66	N = 66
Age (years)	Mean ± SD	26.0 ± 5.48	26.0 ± 5.48
	Range	18-41	18-41
Age Groups	< 18	< 18	< 18
	18 – 40	18-40	18-40
	41 – 64	41-64	41-64
	65 – 75	65-75	65-75
	> 75	>75	>75
Sex	Male	66 (100 %)	66 (100 %)
	Female	0 (0%)	0 (0%)
Race	Asian	0	0
	Black	0	0
	Caucasian	66 (100%)	66 (100 %)
	Hispanic	0	0
	Other	0	0
BMI	Mean ± SD	22.42 ± 2.095	22.42 ± 2.095
	Range	18.6-24.9	18.6-24.9
Other Factors		NA	NA

Is the demographics profile of subjects completing the bioequivalence study in agreement with the current drug product recommendation?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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4.1.2.2.2 Dropout Information

Study No. H217-12						
Subject Number	Reason for Dropout/Replacement	Period	Time (hrs) & Date of dropout	Treatment Missed	Replaced ?	Replaced with
(b) (6)	Subject withdrawn from the study due to AE (Dizziness- Acute on set Vasovagal) before dosing at and he was replaced with subject number (b) (6)	01 In-house Before dosing	08:05 (b) (6)	TR	Yes	Subject # (b) (6)
	Subject withdrawn from the study due to AE (Vomiting) during period 01 in-house.	01 In-house	10:30 (b) (6)	R	No	NA
	Subject withdrawn from the study due to AE (Dizziness and injury below the chin) during period 01 in-house.	01 In-house	16:22 (b) (6)	R	No	NA
	Subject withdrawn from the study due to AE (Rash) during period 01 in- house.	01 In-house	11:00 hrs on (b) (6)	R	No	NA

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(b) (6)	Subject withdrawn from the study due to AE (Fever) during period 01 wash-out.	01 Wash-out	18:12 (b) (6)	T	No	NA
	Subject withdrawn from the study due to AE (Rash) during period 01 wash-out.	01 Wash-out	18:34 (b) (6)	R	No	NA
	Subject failed to report to the clinical facility for period 02 Check- in.	02 Check- in	NA (b) (6)	R	No	NA

Are dropouts appropriate? If no, please comment.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
---	---

4.1.2.2.3 Study Adverse Events

Body System / Adverse Event	Reported Incidence by Treatment Groups			
	Fed Bioequivalence Study No. H217-12			
	Test N=71	Reference N=67	NA*	NA# N=72
Nervous system disorders				
Dizziness	06 (8.4%)	05 (7.5 %)	--	--
Headache	01 (1.4 %)	02 (3.0%)	--	--
Somnolence	02 (2.8%)	07 (11.9%)	--	--
Gastrointestinal system disorders				
Vomiting	01 (1.4 %)	--	--	--
Nausea	--	01 (1.5 %)	--	--
Vascular disorders				
Acute onset vasovagal	--	--	01 (1.4 %)	--
Skin and subcutaneous tissue disorders				
Rash	02 (2.8 %)	--	--	--
Injury below the chin	01 (1.4 %)	--	--	--
General disorders and administration site conditions				
Fever	--	01 (1.5 %)	--	--
Investigations				
Nil	--	--	--	--
Total	13 (11.2%)	16 (25.5%)	01 (1.4%)	--

NA*- Pre-dose adverse event (period 01)

NA# - clinically significant abnormal laboratory parameters evaluated during post study safety assessment, which could not be assigned to any one treatment.

Subjects Experiencing Emesis (Include in eCTD)

Subject Number	Test/ Reference	Period	Time and Date of dosing	Time and Date of emesis	Duration Between Dosing and Start of
----------------	-----------------	--------	-------------------------	-------------------------	--------------------------------------

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					Emesis (hours)
(b) (6)	T	01	This subject was dropped from the study due to vomiting; therefore do not have impact on the study outcome		

Were subjects who experienced vomiting included in statistical analysis?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
If yes, does the time of emesis exceed two times the median Tmax value (immediate release products) or the labeled dosing interval (modified release products)? Please comment.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Was the adverse event profile observed comparable for the test and reference product?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there any serious adverse events or death?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If yes, then if the study conducted in US, are they reported to the OGD Safety Committee?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Are there any other safety concerns based on the adverse event profile?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

4.1.2.2.4 Protocol Deviations

Study No.: H217-12		
Type	Subject #s (Test)	Subject #s (Ref.)
Sampling Time Point Protocol Deviations Period 01	(b) (6)	
Sampling Time Point Protocol Deviations Period 02	(b) (6)	
<p>Other Deviations:</p> <p>Deviation: As per protocol section 8.2 states that “A reduction in systolic blood pressure of at least 20 mm Hg or in diastolic blood pressure of at least 10 mm Hg within 3 minutes of standing was considered as orthostatic hypotension”. However, in period 01, for subject number (b) (6) reduction in diastolic Blood pressure is more than 10 mm of Hg at the time of period 01 check-in orthostatic vitals.</p> <p>Reason: Inadequately missed the vitals due to oversight.</p> <p>Impact analysis: Both the subjects were not having any complaints like dizziness during vital signs measurement (standing and supine BP). Standing BP was within acceptable range as specified in protocol (section 5.1 & 5.2) for both the subjects. And also screening and pre-dose vitals in both the periods is also within normal limits. Hence there is no impact on the safety of study subjects. And subject number (b) (6) was not having any AE’s during the study and subject number (b) (6) having nausea and resolved un eventually. And both the subjects checked out in both the periods in Heamodynamically stable condition.</p>		

If the firm used nominal time points, the sampling time deviations (if any) > 5% and 90% CI of any PK parameters is border line, please reanalyze data using actual sampling time	<input checked="" type="checkbox"/> Actual <input type="checkbox"/> Nominal
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Is the dropout/withdrawal/exclusion of subjects and protocol deviations as per the criteria mentioned in the IRB approved study protocol?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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Comments on Clinical Results: Adequate

4.1.2.3 Bioanalytical Results

4.1.2.3.1 SOPs dealing with Sample Analysis including Repeat Analysis

Provide only if the SOPs are different from the fasting study.

4.1.2.3.2 Sample Analysis Calibration and Quality Control

Fasting Bioequivalence Study No. H217-12 Analyte Name - Iloperidone								
Parameter	Standard Curve Samples							
Standard IDs	STD 8	STD 7	STD 6	STD 5	STD 4	STD 3	STD 2	STD 1
Concentration (pg/mL)	20.017	56.498	282.489	1177.039	2140.071	3292.417	4389.890	5017.017
Inter day Precision (% CV)	1.4	4.1	3.6	2.3	1.9	2.0	2.0	2.6
Inter day Accuracy (% Bias)	1.1	-3.1	-0.4	0.8	1.1	1.0	1.0	-1.6
Linearity (r ²)	0.996055 – 0.999892							
Linearity Range (pg/mL)	20.017-5017.017							
Sensitivity/LOQ (pg/mL)	20.017							

Analyte Name - Iloperidone				
Parameter	Quality Control Samples			
Quality Control Sample IDs	LQC	MQC	M2QC	HQC
Concentration (pg/mL)	57.917	500.144	2000.577	4247.509
Inter day Precision (% CV)	8.5	7.8	5.6	6.4
Inter day Accuracy (% Actual)	95.2	100.0	101.9	102.2

Fasting Bioequivalence Study No. H217-12 Analyte Name - Iloperidone metabolite P88								
Parameter	Standard Curve Samples							
Standard IDs	STD 8	STD 7	STD 6	STD 5	STD 4	STD 3	STD 2	STD 1
Concentration (pg/mL)	20.008	56.471	282.356	1176.485	2139.064	3290.867	4387.823	5014.655
Inter day Precision (% CV)	1.4	3.8	2.5	2.1	1.6	1.4	1.7	2.6
Inter day Accuracy (% Bias)	0.2	-0.2	-1.0	0.6	0.5	0.4	0.2	-0.4
Linearity (r ²)	0.996428 – 0.999872							
Linearity Range (pg/mL)	20.008 – 5014.655							

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Sensitivity/LOQ (pg/mL)	20.008
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Analyte Name - Iloperidone metabolite P88				
Parameter	Quality Control Samples			
Quality Control Sample IDs	LQC	MQC	M2QC	HQC
Concentration (pg/mL)	57.463	496.230	1984.921	4214.269
Inter day Precision (% CV)	6.1	6.9	4.9	5.7
Inter day Accuracy (% Actual)	97.7	99.2	101.4	101.3

Are the concentrations of standard curve and QC samples relevant to the concentration of the samples?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Are there any concerns related to sample analysis (including rejected runs, reinjection, sample dilution, etc.)? If yes, comment below or consult TL/tertiary reviewer for additional actions	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Were 20% of chromatograms included?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were chromatograms serially or randomly selected?	<input checked="" type="checkbox"/> serially <input type="checkbox"/> randomly
Any interfering peaks in chromatogram?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Were the chromatograms submitted by the firm acceptable?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Were 100% raw analytical data, including failed runs, provided?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

4.1.2.3 Reanalysis of Study Samples

Fasting Bioequivalence Study No. H217-12 Iloperidone Analytical Report Page No 170 of 171								
Reason why assay was repeated	Number of samples reanalyzed				Number of recalculated values used after reanalysis			
	Actual number		% of total assays		Actual number		% of total assays	
	T	R	T	R	T	R	T	R
Pharmacokinetic	0	0	0.000	0.000	0	0	0.000	0.000
ISTD variation	50	55	1.468	1.615	50	55	1.468	1.615
Instrumental error	2	0	0.059	0.000	2	0	0.059	0.000
Deviated sample	5	4	0.147	0.117	5	4	0.147	0.117
Total	57	59	1.674	1.732	57	59	1.674	1.732

Total No. of samples analyzed: 3406

Fasting Bioequivalence Study No. H217-12 Iloperidone metabolite P88 Analytical Report Page No 170 of 171				
Reason why assay was repeated	Number of samples reanalyzed		Number of recalculated values used after reanalysis	
	Actual number	% of total assays	Actual number	% of total assays

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	T	R	T	R	T	R	T	R
Pharmacokinetic	0	0	0.000	0.000	0	0	0.000	0.000
ISTD variation	12	6	0.352	0.176	12	6	0.352	0.176
Instrumental error	2	0	0.059	0.000	2	0	0.059	0.000
Deviated sample	2	0	0.059	0.000	2	0	0.059	0.000
Total	16	6	0.470	0.176	16	6	0.470	0.176

Total No. of samples analyzed: 3406

Does the reviewer agree with the reanalysis of study samples: analytical and/or PK repeat?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If no, is recalculation of PK parameters necessary?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Did recalculation of PK parameters change the study outcome?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Are the PK parameters of reanalysis still within the acceptance limits for the 90% CI?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A

Comments on Bioanalytical Results: Adequate

(Please comment if any of above items need additional comments)

4.1.2.4 Pharmacokinetic Results

4.1.2.4.1 Arithmetic Mean Pharmacokinetic Parameters - Reviewer Calculated

Fed Bioequivalence Study No. H217-12 (Iloperidone)									
Parameter (units)	Test				Reference				T/R
	Mean	%CV	Min	Max	Mean	%CV	Min	Max	
AUC _{0-t} (hr*pg/ml)	25704.14	33.33	9201.93	55008.15	26060.61	34.42	7961.61	53812.63	0.99
AUC _∞ (hr*pg/ml)	27726.39	33.35	10775.70	59363.96	28258.69	34.20	8579.35	58424.89	0.98
C _{max} (pg/ml)	1334.769	39.39	379.19	3001.88	1470.085	46.31	458.01	2914.27	0.91
T _{max} * (hr)	4.500	.	1.00	8.00	3.500	.	1.00	6.00	1.29
K _{el} (hr ⁻¹)	0.023	27.73	0.01	0.04	0.023	31.10	0.01	0.04	1.02
T _{1/2} (hr)	33.243	43.19	16.59	116.50	34.349	39.34	17.62	70.86	0.97

* T_{max} values are presented as median, range

Fed Bioequivalence Study No. H217-12 (P88)									
Parameter (units)	Test				Reference				T/R
	Mean	%CV	Min	Max	Mean	%CV	Min	Max	
AUC _{0-t} (hr*pg/ml)	66668.96	28.91	32051.65	130569.3	67645.68	26.52	28688.82	113092.9	0.99
AUC _∞ (hr*pg/ml)	76375.02	28.90	40273.35	151523.4	77588.36	28.55	34217.06	149212.3	0.98
C _{max} (pg/ml)	2142.015	29.00	900.48	4167.03	2205.832	24.86	884.29	3329.75	0.97

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Tmax* (hr)	5.250	.	1.50	10.00	4.500	.	1.00	8.03	1.17
Kel (hr⁻¹)	0.017	28.30	0.01	0.03	0.016	22.93	0.01	0.03	1.01
T_{1/2} (hr)	45.670	32.86	24.22	104.95	44.961	26.66	25.37	81.12	1.02

* Tmax values are presented as median, range

4.1.2.4.2 Geometric Means and 90% Confidence Intervals - Firm Calculated

Geometric Least Square Mean Ratios and 90% Confidence Interval of Iloperidone (N=66)

Parameter	Ln-transformed Geometric Least Square Mean		Ratio (T/R)%	90% Confidence Interval	
	Test (T)	Reference (R)		Lower	Upper
C _{max} (pg/mL)	1235.140	1322.776	93.37	87.69	99.43
AUC _{0-t} (pg.hr/mL)	24319.617	24641.239	98.69	96.55	100.89
AUC _∞ (pg.hr/mL)	26260.637	26748.581	98.18	95.87	100.54

4.1.2.4.3 Geometric Means and 90% Confidence Intervals - Reviewer Calculated

Iloperidone Tablets (No of subjects completed = 66) Dose (2 × 1 mg) Least Squares Geometric Means, Ratio of Means, and 90% Confidence Intervals						
Fed Bioequivalence Study No. H217-12 (Iloperidone)						
Parameter (units)	N	Test	RLD	Ratio	90% C.I.	
AUC _{0-t} (hr *pg/ml)	66	24319.62	24641.24	0.99	96.55	100.89
AUC _∞ (hr *pg/ml)	66	26260.64	26748.58	0.98	95.87	100.54
C _{max} (pg/ml)	66	1235.14	1322.78	0.93	87.69	99.43

Iloperidone Tablets (No of subjects completed = 66) Dose (2 × 1 mg) Least Squares Geometric Means, Ratio of Means, and 90% Confidence Intervals						
Fed Bioequivalence Study No. H217-12 (P88)						
Parameter (units)	N	Test	RLD	Ratio	90% C.I.	
AUC _{0-t} (hr *pg/ml)	66	63956.49	65265.35	0.98	96.11	99.92
AUC _∞ (hr *pg/ml)	66	73285.47	74597.09	0.98	96.12	100.41
C _{max} (pg/ml)	66	2058.48	2133.44	0.96	93.34	99.74

4.1.2.4.4 Additional Information for the Study

Root Mean Square Error	Iloperidone	Parameter	RMSE
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	<table border="1"> <tr> <td style="background-color: #ffcc00;"></td> <td>LAUCT</td> <td>0.0754</td> </tr> <tr> <td style="background-color: #ffcc00;"></td> <td>LAUCI</td> <td>0.0816</td> </tr> <tr> <td style="background-color: #ffcc00;"></td> <td>LCMAX</td> <td>0.2157</td> </tr> </table> <table border="1"> <tr> <td style="background-color: #ffcc00;">P88</td> <td>Parameter</td> <td>RMSE</td> </tr> <tr> <td style="background-color: #ffcc00;"></td> <td>LAUCT</td> <td>0.0668</td> </tr> <tr> <td style="background-color: #ffcc00;"></td> <td>LAUCI</td> <td>0.0752</td> </tr> <tr> <td style="background-color: #ffcc00;"></td> <td>LCMAX</td> <td>0.1139</td> </tr> </table>		LAUCT	0.0754		LAUCI	0.0816		LCMAX	0.2157	P88	Parameter	RMSE		LAUCT	0.0668		LAUCI	0.0752		LCMAX	0.1139
	LAUCT	0.0754																				
	LAUCI	0.0816																				
	LCMAX	0.2157																				
P88	Parameter	RMSE																				
	LAUCT	0.0668																				
	LAUCI	0.0752																				
	LCMAX	0.1139																				
<p>Is there a Tmax difference between Test and Reference? If yes, please provide brief explanation (or detailed explanation, including Tmax analysis, for substantial difference)</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Please see comments below.																					
<p>Were the subjects dosed in groups? If yes, was the statistical analysis proper? Is reanalysis by reviewer necessary?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No																					
<p>Are there measurable drug concentrations at 0 hr? If yes, please comment (and take necessary action, if needed)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No																					
<p>Are there first measurable drug concentration as Cmax? If yes, please comment</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Subject ^{(b) (6)} of reference product for parent compound																					
<p>Are there Cmax at the first time point? If yes, is the study (sample) design adequate?</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No																					

Ratio of AUC0-t/AUC∞ ¹⁵ (Iloperidone)				
Treatment	n	Mean	Minimum	Maximum
Test	66	0.93	0.75	0.97
Reference	66	0.92	0.74	0.97
Ratio of AUC0-t/AUC∞ (p88)				
Treatment	n	Mean	Minimum	Maximum
Test	66	0.87	0.74	0.94
Reference	66	0.88	0.74	0.95
<p>If the minimum ratios less than 0.8, were they due to inadequate sampling schedule? Provide additional comments below</p>	<p>1 out of 66 subjects ^{(b) (6)} from test-treatment group and 1 out of 66 subjects ^{(b) (6)} from reference-treatment group showed ratio of AUCt/AUC∞ for iloperidone less than 0.80.</p> <p>5 out of 66 subjects ^{(b) (6)} from test-treatment group and 5 out of 66 ^{(b) (6)} subjects from reference-treatment group showed ratio of AUCt/AUC∞ for metabolite p88 less than 0.80.</p>			

Comments on PK results: Adequate

¹⁵ See individual test to reference ratios of PK Parameters in SAS Output

1. Per the RLD labeling, administration of iloperidone with a standard high-fat meal would delay the T_{max} by 1 hour for iloperidone and 2 hours for P88. The observed median T_{max} for iloperidone and P88 in the fed study are consistent with the RLD labeling.
2. There is a median T_{max} difference for the parent drug, iloperidone between the test and reference product in the fed study. The observed median T_{max} (range) of the test product is 4.50 (1.00-8.00) hours versus 3.50 (1.00-6.00) hours for the reference product ($T/R=1.29$). Per the RLD labeling, the T_{max} for iloperidone is 2-4 hours, and is indicated for [REDACTED] ^{(b) (4)} for schizophrenia. The reviewer considered the observed difference in T_{max} should not have a clinical impact on efficacy or safety. Therefore the T_{max} difference of iloperidone under fed conditions is acceptable.
3. Subject [REDACTED] ^{(b) (6)} had measurable concentration for iloperidone at pre-dose (0 hr) in Period II (test). The 0 h concentration of [REDACTED] ^{(b) (4)} % of C_{max} (2224.974 pg/mL) for this subject in this period. Therefore the subject was not excluded.
4. A total of 2 subjects had AUC_t/AUC_{∞} ratios below 0.8 for the parent drug, iloperidone. The mean AUC_t/AUC_{∞} ratio for iloperidone is more than 0.9 for both test and reference products indicating that the firm's sampling schedule was carried out for a sufficient period of time.
5. The reviewer agrees with the firm's pharmacokinetic and statistical analysis. The 90% confidence intervals for the AUC_{0-t} , AUC_{∞} , and C_{max} geometric mean test/reference ratios for test iloperidone are within acceptable BE limits of 80-125%.
6. The PK parameters of the test and reference products for the active metabolite P88 were comparable in the fed BE study. Therefore, the metabolite data are supportive.

The fed BE study is **adequate**.

4.1.2.5 Overall Comment

Was the Fed bioequivalence study acceptable? Acceptable

Mean Plasma Concentrations, Single-Dose Fed Bioequivalence Study

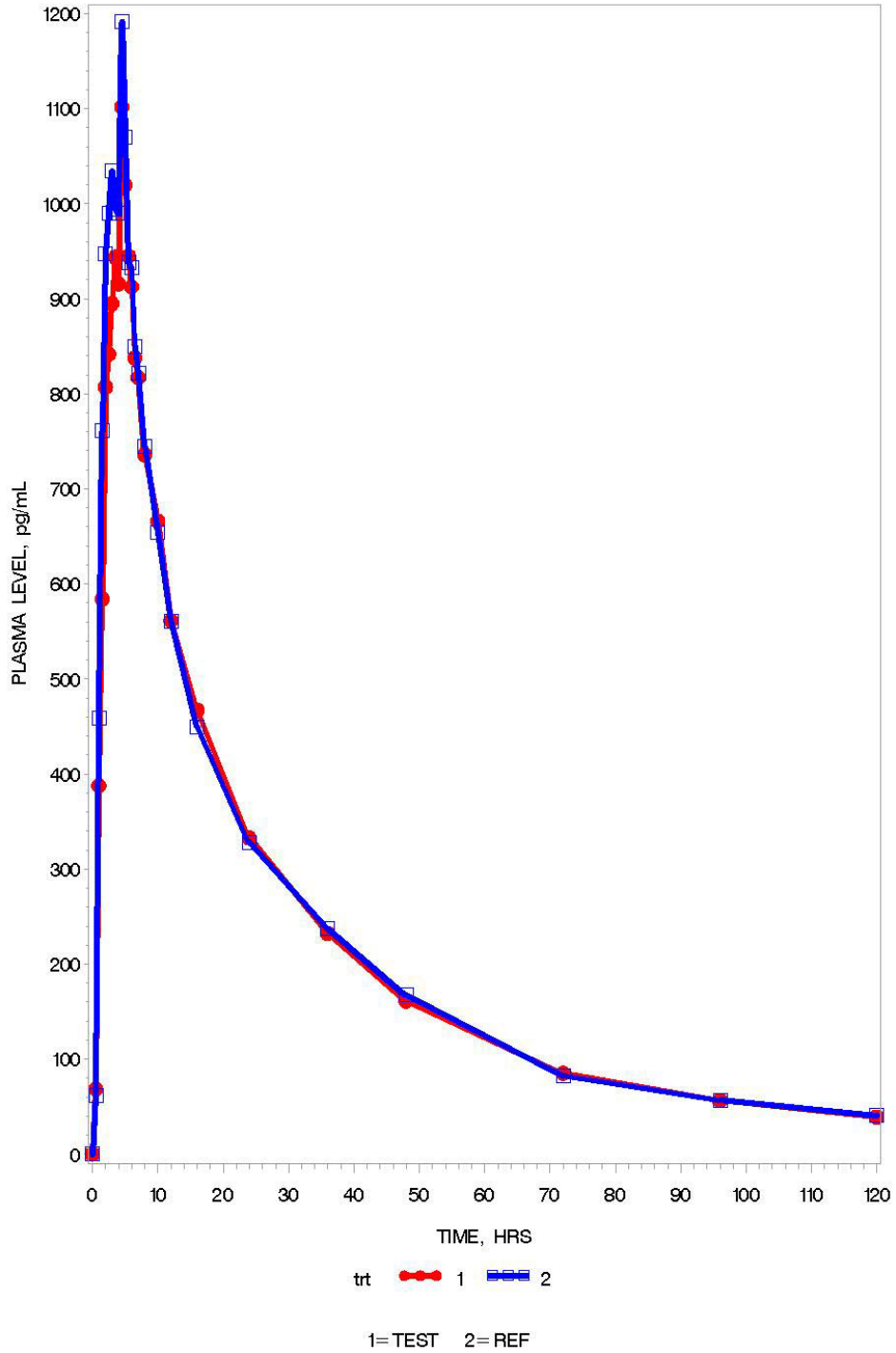
Iloperidone Tablets					
Dose (2 × 1 mg)					
Iloperidone					
Time (hr)	Test (n=66)		Reference (n=66)		T/R Ratio
	Mean (pg/mL)	% CV	Mean (pg/mL)	% CV	
0.00	0.45	812.40	0.00	.	.
0.50	68.85	113.51	61.39	129.30	1.12
1.00	388.01	124.76	458.79	102.06	0.85
1.50	584.51	85.39	760.81	87.68	0.77
2.00	807.28	59.47	946.82	63.63	0.85
2.50	841.84	53.12	990.32	58.80	0.85
3.00	895.08	50.11	1034.21	56.23	0.87
3.50	943.79	44.02	993.98	48.37	0.95
4.00	915.82	39.73	989.72	46.73	0.93
4.50	1102.03	44.39	1191.24	44.52	0.93
5.00	1019.83	39.54	1069.87	45.42	0.95
5.50	945.24	37.76	937.81	38.71	1.01
6.00	912.83	37.97	932.28	40.50	0.98
6.50	837.92	35.72	849.52	36.82	0.99
7.00	817.08	35.88	821.10	36.47	1.00
8.00	736.18	34.98	744.62	38.49	0.99
10.00	666.13	34.45	653.90	34.35	1.02
12.00	561.27	37.73	561.14	36.02	1.00
16.00	467.30	36.55	449.91	37.30	1.04
24.00	333.02	30.81	328.15	32.14	1.01
36.00	232.45	38.56	237.22	35.12	0.98
48.00	161.44	38.72	167.35	39.00	0.96
72.00	85.42	46.54	82.48	45.42	1.04
96.00	56.83	46.55	56.88	50.29	1.00
120.00	39.33	49.66	40.73	53.67	0.97

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Iloperidone Tablets					
Dose (2 × 1 mg)					
P88					
Time (hr)	Test (n=66)		Reference (n=66)		T/R Ratio
	Mean (pg/mL)	% CV	Mean (pg/mL)	% CV	
0.00	7.37	200.60	6.71	193.99	1.10
0.50	94.64	90.36	86.33	111.99	1.10
1.00	485.50	113.11	562.31	106.14	0.86
1.50	807.98	91.23	958.82	71.96	0.84
2.00	1095.97	64.70	1265.43	55.03	0.87
2.50	1176.58	45.44	1366.77	42.87	0.86
3.00	1356.66	41.67	1537.54	36.98	0.88
3.50	1537.45	33.14	1659.21	34.13	0.93
4.00	1643.10	30.28	1768.49	29.78	0.93
4.50	1916.99	29.41	2035.50	26.66	0.94
5.00	1808.42	28.40	1920.48	26.37	0.94
5.50	1796.97	28.14	1825.52	25.63	0.98
6.00	1766.57	27.61	1806.18	25.96	0.98
6.50	1748.02	26.02	1780.74	24.94	0.98
7.00	1754.64	26.13	1792.64	24.06	0.98
8.00	1736.63	25.26	1791.30	24.04	0.97
10.00	1561.55	25.12	1581.51	27.59	0.99
12.00	1417.96	26.39	1437.15	24.90	0.99
16.00	1176.32	29.18	1166.08	28.59	1.01
24.00	1017.20	30.40	982.41	25.36	1.04
36.00	609.22	36.75	626.81	33.33	0.97
48.00	461.04	36.53	469.19	34.72	0.98
72.00	293.24	42.17	295.33	34.22	0.99
96.00	199.30	39.12	206.53	37.59	0.97
120.00	148.64	38.07	149.22	39.28	1.00

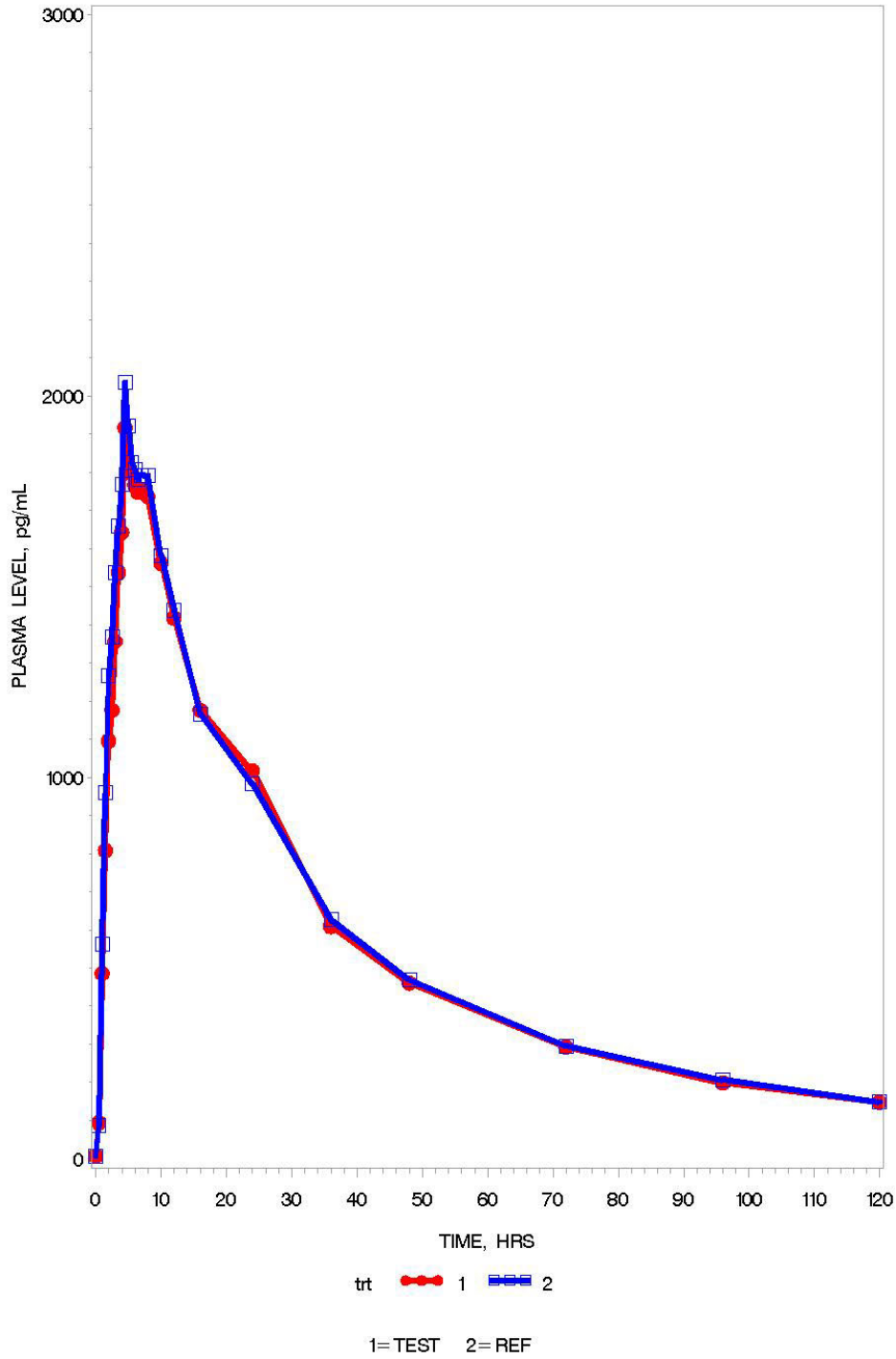
**Mean Plasma Concentrations, Single-Dose Fed Bioequivalence Study
(Add profiles for additional API)**

PLASMA Iloperidone LEVELS
Iloperidone Tablets, ANDA 207231
UNDER FED CONDITIONS
DOSE= 2 x 1 mg



ANDA 207231
Single-Dose Fed Bioequivalence Study Review (H217-12)

PLASMA P88 LEVELS
Iloperidone Tablets, ANDA 207231
UNDER FED CONDITIONS
DOSE= 2 x 1 mg



Are all strengths of the test product proportionally similar per the BA/BE guidance criteria?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Are the amounts of all inactive ingredients, based on Maximum Daily Dose (MDD), within IIG (per unit) limits?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If no, are they all within IIG (per day) limits?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
If no, are additional data or Pharm/Tox consult necessary?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Are all color additives and elemental iron within limits specified by CFR (if applicable) or less than 0.1% of the total unit weight (w/w)?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Are all strengths of the test formulation acceptable?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Comments on Formulation:

¹⁶ FDA Internal IIG Database, <http://intranetapps.test.fda.gov/scripts/iig/> last accessed on 02/29/16

¹⁷ NDA 21882 labeling, http://www.accessdata.fda.gov/drugsatfda_docs/label/2015/021882s021lbl.pdf, initial U.S. Approval 2005, last accessed 03/01/2016

¹⁸ DARRTS NDA 21882, REV-QUALITY-03(General Review), dated 07/06/2005

The levels of inactive ingredients in the test formulation are lower than that present in the FDA-approved drug products based on CDER's IID.

The 2 mg, 4 mg, 6 mg, 8 mg, 10 mg, and 12 mg strengths of the test formulation are proportionally similar to the 1 mg strength which underwent bioequivalence testing.

There is no elemental iron in the composition of the product, which complies with the element iron limit of not exceeding 5 mg per day according to 21 CFR 73.1200(c).

The firm's formulation is **acceptable**.

4.3 Dissolution Testing (Applicable only if there are waiver requests)

Dissolution data were reviewed separately, and the overall review result is **adequate**. The dissolution review was finalized at GDRP ANDA-207231-ORIG-1, <http://panorama.fda.gov/task/view?ID=542129670039f143f84ce04856b9c61f>, Biopharmaceutics Primary Review (completion date 14-Mar-2015 and 22-Jun-2015)

Dissolution Data ¹⁹

Dissolution Conditions		Apparatus:		USP Type II (Paddle)							
		Speed of Rotation:		50 RPM							
		Medium:		0.1 N Hydrochloric acid							
		Volume:		500 mL							
		Temperature:		37°C ± 0.5°C							
Firm's Proposed Specifications		NLT ^(b) ₍₄₎ % (Q) dissolved in 30 minutes									
Dissolution Testing Site (Name, Address)		INVENTIA HEALTHCARE PVT. LTD, Plot No.F1 & F-1/1, Additional MIDC, Ambemath (East)-421 506 District: Thane, Maharashtra, India									
Study Ref No.	Testing Date	Product ID (Test - Manufacture Date, Reference – Expiry Date)	Dosage Strength & Form	No. of Dosage Units		Collection Times (mins)					Study Report Location
						10	15	30	45	60	
Batch No. EXB/618/01	Nov. 2013	Test Product: Iloperidone Tablets Mfg. date: Jul. 2013	1 mg Tablet	12	Mean	96	97	97	97	98	Section 2.7.1.2
					Range	^(b) ₍₄₎					
					% CV	2.4	2.4	3.2	3.4	3.3	
Lot No. FFZN	Nov. 2013	Reference Listed Product: Fanapt® Iloperidone Tablets Exp. date: Apr. 2014	1 mg Tablet	12	Mean	93	94	95	95	95	Section 2.7.1.2
					Range	^(b) ₍₄₎					
					% CV	3.0	1.9	1.8	1.8	1.6	

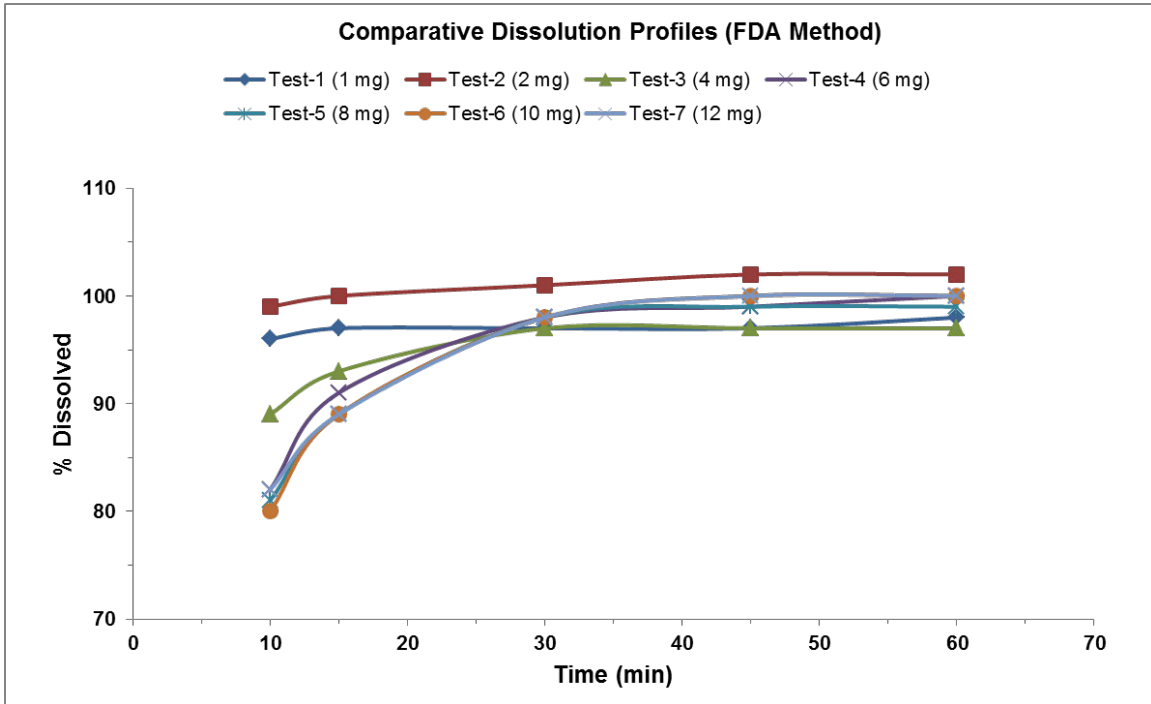
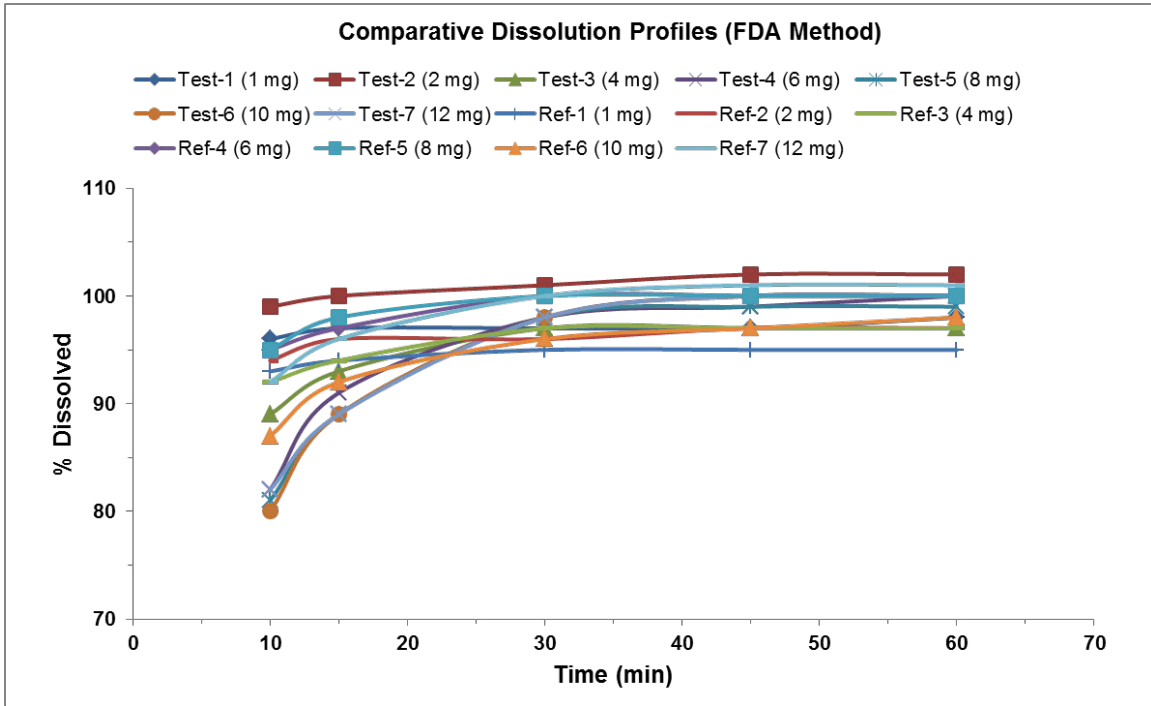
¹⁹ Tables are from Dissolution Only Review. The applicant acknowledged the FDA-recommended Dissolution Specification of NLT ^(b)₍₄₎% (Q) in 30 minutes in its amendment dated June 10, 2015.

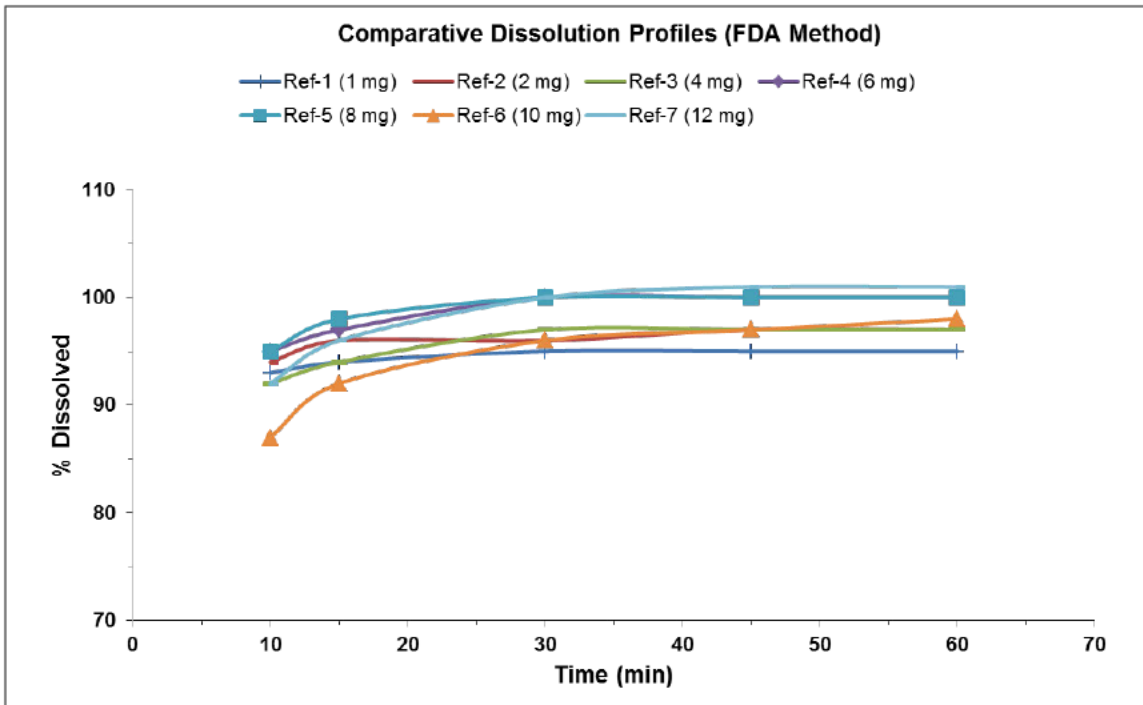
Dissolution Conditions		Apparatus:	USP Type II (Paddle)								
		Speed of Rotation:	50 RPM								
		Medium:	0.1 N Hydrochloric acid								
		Volume:	500 mL								
		Temperature:	37°C ± 0.5°C								
Firm's Proposed Specifications		NLT ^(b) ₍₄₎ % (Q) dissolved in 30 minutes									
Dissolution Testing Site (Name, Address)		INVENTIA HEALTHCARE PVT. LTD, Plot No.F1 & F-1/1, Additional MIDC, Ambemath (East)-421 506 District: Thane, Maharashtra, India									
Study Ref No.	Testing Date	Product ID (Test - Manufacture Date, Reference – Expiry Date)	Dosage Strength & Form	No. of Dosage Units	Collection Times (mins)					Study Report Location	
					10	15	30	45	60		
Batch No. EXB/619/01	Nov. 2013	Test Product: Iloperidone Tablets Mfg. date: Jul. 2013	2 mg Tablet	12	Mean	99	100	101	102	102	Section 2.7.1.2
					Range	(b) (4)					
					% CV	2.0	1.4	2.5	2.4	2.6	
Lot No. FFZP	Nov. 2013	Reference Product: Fanapt® Iloperidone Tablets Exp. date: Apr. 2014	2 mg Tablet	12	Mean	94	96	96	97	97	Section 2.7.1.2
					Range	(b) (4)					
					% CV	5.0	3.5	5.0	5.3	4.4	
Batch No. EXB/620/01	Nov. 2013	Test Product: Iloperidone Tablets Mfg. date: Jul. 2013	4 mg Tablet	12	Mean	89	93	97	97	97	Section 2.7.1.2
					Range	(b) (4)					
					% CV	2.2	1.9	2.1	2.0	1.7	
Lot No. FFZM	Nov. 2013	Reference Product: Fanapt® Iloperidone Tablets Exp. date: Apr. 2014	4 mg Tablet	12	Mean	92	94	97	97	97	Section 2.7.1.2
					Range	(b) (4)					
					% CV	3.6	2.4	2.3	2.0	2.7	

Dissolution Conditions		Apparatus:	USP Type II (Paddle)								
		Speed of Rotation:	50 RPM								
		Medium:	0.1 N Hydrochloric acid								
		Volume:	500 mL								
		Temperature:	37°C ± 0.5°C								
Firm's Proposed Specifications		NLT ^(b) ₍₄₎ % (Q) dissolved in 30 minutes									
Dissolution Testing Site (Name, Address)		INVENTIA HEALTHCARE PVT. LTD, Plot No.F1 & F-1/1, Additional MIDC, Ambemath (East)-421 506 District: Thane, Maharashtra, India									
Study Ref No.	Testing Date	Product ID (Test - Manufacture Date, Reference – Expiry Date)	Dosage Strength & Form	No. of Dosage Units	Collection Times (mins)					Study Report Location	
					10	15	30	45	60		
Batch No. EXB/621/01	Nov. 2013	Test Product: Iloperidone Tablets Mfg. date: Jul. 2013	6 mg Tablet	12	Mean	82	91	98	99	100	Section 2.7.1.2
					Range	^(b) ₍₄₎					
					% CV	3.5	2.3	2.3	2.2	2.3	
Lot No. FYPB	Nov. 2013	Reference Product: Fanapt® Iloperidone Tablets Exp. date: Jul. 2014	6 mg Tablet	12	Mean	95	97	100	100	100	Section 2.7.1.2
					Range	^(b) ₍₄₎					
					% CV	1.6	1.3	1.2	1.1	1.2	
Batch No. EXB/622/01	Nov. 2013	Test Product: Iloperidone Tablets Mfg. date: Jul. 2013	8 mg Tablet	12	Mean	81	89	98	99	99	Section 2.7.1.2
					Range	^(b) ₍₄₎					
					% CV	2.6	2.0	1.9	1.2	1.5	
Lot No. FYPC	Nov. 2013	Reference Product: Fanapt® Iloperidone Tablets Exp. date: Apr. 2014	8 mg Tablet	12	Mean	95	98	100	100	100	Section 2.7.1.2
					Range	^(b) ₍₄₎					
					% CV	1.0	1.2	0.7	1.2	1.2	

Dissolution Conditions		Apparatus:	USP Type II (Paddle)								
		Speed of Rotation:	50 RPM								
		Medium:	0.1 N Hydrochloric acid								
		Volume:	500 mL								
		Temperature:	37°C ± 0.5°C								
Firm's Proposed Specifications		NLT ^(b) / ₍₄₎ % (Q) dissolved in 30 minutes									
Dissolution Testing Site (Name, Address)		INVENTIA HEALTHCARE PVT. LTD, Plot No.F1 & F-1/1, Additional MIDC, Ambemath (East)-421 506 District: Thane, Maharashtra, India									
Study Ref No.	Testing Date	Product ID (Test - Manufacture Date, Reference – Expiry Date)	Dosage Strength & Form	No. of Dosage Units		Collection Times (mins)					Study Report Location
						10	15	30	45	60	
Batch No. EXB/623/01	Nov. 2013	Test Product: Iloperidone Tablets Mfg. date: Jul. 2013	10 mg Tablet	12	Mean	80	89	98	100	100	Section 2.7.1.2
					Range	(b) (4)					
					% CV	2.3	1.9	2.0	1.9	1.7	
Lot No. DXFY	Nov. 2013	Reference Product: Fanapt® Iloperidone Tablets Exp. date: Apr. 2014	10 mg Tablet	12	Mean	87	92	96	97	98	Section 2.7.1.2
					Range	(b) (4)					
					% CV	2.5	1.3	1.0	0.7	1.0	
Batch No. EXB/624/01	Nov. 2013	Test Product: Iloperidone Tablets Mfg. date: Jul. 2013	12 mg Tablet	12	Mean	82	89	98	100	100	Section 2.7.1.2
					Range	(b) (4)					
					% CV	4.4	2.5	2.8	2.5	2.8	
Lot No. KKTF	Nov. 2013	Reference Product: Fanapt® Iloperidone Tablets Exp. date: Dec. 2015	12 mg Tablet	12	Mean	92	96	100	101	101	Section 2.7.1.2
					Range	(b) (4)					
					% CV	1.5	1.7	1.6	1.2	1.4	

Dissolution Profiles





F2 metric calculated?	<input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If no, reason why F2 not calculated	Fast dissolving
Please comment on whether dissolution data are adequate to support waiver requests.	Adequate

Overall Comments: Adequate

Dissolution data were reviewed separately, and the overall review result is **adequate**²⁰. Per the dissolution review, the DB II acknowledges that the firm will conduct the dissolution testing for its test product using the following FDA-recommended method and specification:

USP Apparatus:	II (paddle)
Rotational Speed:	50 rpm
Temperature:	37°C ± 0.5°C
Media:	0.1 N Hydrochloric Acid
Volume:	500 mL
Specification:	NLT ^(b) ₍₄₎ % (Q) dissolved in 30 minutes

²⁰ ANDA-207231-ORIG-1, <http://panorama.fda.gov/task/view?ID=542129670039f143f84ce04856b9c61f>, Biopharmaceutics Primary Review (completion date 14-Mar-2015 and 22-Jun-2015)

The dissolution data are adequate with respect to supporting waiver requests of the lower strengths.

4.4 Attachments

4.4.1 Additional Studies (If applicable)

Are there any additional studies? (e.g. pilot , failed) If yes, please provide the location of report (complete/summary)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No The firm also submitted 3 pilot studies located in Section 5.3.1.2, Pilot fasting Study H029-12, Pilot fed study H030-12, Pilot fasting Study H031-12. Please see Bioequivalence Summary table .
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4.4.1.1 Pilot fasting study H029-12

Number of Subjects (N)	N = 8
Are the test formulations in the pilot/failed studies and pivotal studies similar²¹?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Batch No: ILOT-1-1208045 was used in pilot studies# H029-12 and H030-12. The formulation is similar to that of the pivotal biobatch. The formulation data are attached below.
What was the objective of pilot/failed study?	To determine the single-dose oral bioequivalence of Iloperidone Tablets (2 x1 mg) of Inventia Healthcare Pvt Ltd., India and FANAPT® (iloperidone) tablets (2x1 mg) (b) (4) Distributed by: Novartis Pharmaceuticals Corporation East Hanover, NJ 07936 in normal, healthy, adult, human subjects under fasting condition.
Please comment on reason(s) of failure	LnCmax failed to meet the acceptable BE criteria of 80-120% under fasting conditions. It is mainly due to small number of subjects enrolled, therefore the power of the BE study is inadequate.
Any serious adverse events or deaths reported?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Iloperidone (Pilot study H029-12)						
Iloperidone Tablets (No. of subjects completed =08) Dose: 2 x 1 mg Least Squares Geometric Means, Ratio of Means, and 90% Confidence Intervals Fasting Bioequivalence Study (Study No. H029-12)						
Parameters	Test	N	RLD	N	Ratio	90% CI
AUC _{0-12h}	28647.878	8	29803.952	8	96.12	88.34-104.58
AUC ₀₋₄	27034.783	8	28306.418	8	95.51	88.02-103.64
C _{max}	1985.282	8	2329.339	8	85.23	73.38-99.00

²¹ [Submission of Summary Bioequivalence Data for Abbreviated New Drug Applications](#)

4.4.1.2 Pilot fed study H030-12

Number of Subjects (N)	N = 11
Are the test formulations in the pilot/failed studies and pivotal studies similar²²?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Batch No: ILOT-1-1208045 was used in pilot studies# H029-12 and H030-12. The formulation is similar to that of the pivotal biobatch. The formulation data are attached below.
What was the objective of pilot/failed study?	To determine the single-dose oral bioequivalence of Iloperidone Tablets (2 x1 mg) of Inventia Healthcare Pvt Ltd., India and FANAPT® (iloperidone) tablets (2x1 mg) (b) (4) Distributed by: Novartis Pharmaceuticals Corporation East Hanover, NJ 07936 in normal, healthy, adult, human subjects under fed condition.
Please comment on reason(s) of failure	LnCmax failed to meet the acceptable BE criteria of 80-120% under fed conditions. It is mainly due to small number of subjects enrolled, therefore the power of the BE study is inadequate. The calculated power and ISCV indicated larger intra-subject variability (36.9%) for PK parameter Cmax in the fed study, compared to that of the fasting study (15.0%), suggesting larger number of subjects be considered to achieve adequate power.
Any serious adverse events or deaths reported?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

²² [Submission of Summary Bioequivalence Data for Abbreviated New Drug Applications](#)

Iloperidone (Pilot Study H030-12)						
Iloperidone Tablets (No. of subjects completed =11) Dose: 2 x 1 mg Least Squares Geometric Means, Ratio of Means, and 90% Confidence Intervals Fed Bioequivalence Study (Study No. H030-12)						
Parameters	Test	N	RLD	N	Ratio	90% CI
AUC _{0-12h}	30021.498	11	27753.930	11	108.17	96.73-120.97
AUC ₀₋₁	27771.21	11	25861.732	11	107.38	96.50-119.49
C _{max}	1412.464	11	1553.272	11	90.93	68.69-120.39

(b) (4)

4.4.1.3 Pilot fasting study H031-12

Number of Subjects (N)	N = 10
Are the test formulations in the pilot/failed studies and pivotal studies similar²³?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Batch No: SC0270 was used in pilot study# H031-12. The formulation is same as that of the pivotal biobatch. The formulation data are attached below.
What was the objective of pilot/failed study?	To determine the single-dose oral bioequivalence of Iloperidone Tablets (2 x 1 mg) of Inventia Healthcare Pvt Ltd., India and FANAPT® (iloperidone) tablets (2x1 mg) (b) (4) Distributed by: Novartis Pharmaceuticals Corporation East Hanover, NJ 07936 in normal, healthy, adult, human subjects under fasting condition.
Please comment on reason(s) of failure	LnCmax failed to meet the upper bound of BE criteria of 80-125% under fasting conditions. It is mainly due to small number of subjects enrolled, therefore the power of the BE study is inadequate.
Any serious adverse events or deaths reported?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

















²³ [Submission of Summary Bioequivalence Data for Abbreviated New Drug Applications](#)

Iloperidone (Pilot Study H031-12)

Iloperidone Tablets (No. of subjects completed =10) Dose: 2 x 1 mg Least Squares Geometric Means, Ratio of Means, and 90% Confidence Intervals Fasting Bioequivalence Study (Study No. H031-12)						
Parameters	Test	N	RLD	N	Ratio	90% CI
AUC_{0-∞}	22772.386	10	23044.764	10	98.82	88.30-110.59%
AUC_{0-t}	20785.952	10	20817.820	10	99.85	91.41-109.06%
C_{max}	1426.064	10	1296.286	10	110.01	89.76-134.83%

(b) (4)

4.4.2 SAS Output

Study	SAS Data	SAS Code	SAS Stat	SAS Table
Fasting	 207231_FASTING_D atasets_Iloperidone.c	 Fasting 207231_iloferidone_1	 207231_FASTING_st at_Iloperidone.doc	 207231_FASTING_ta ble_Iloperidone.doc
	 207231_FASTING_D atasets_P88.doc	 Fasting 207231_p88_CONTIN	 207231_FASTING_st at_P88.doc	 207231_FASTING_ta ble_P88.doc
Fed	 207231_FED_Datase ts_Iloperidone.doc	 Fed 207231_iloferidone_1	 207231_FED_stat_I loperidone.doc	 207231_FED_table_I loperidone.doc
	 207231_FED_Datase ts_P88.doc	 Fed 207231_p88_CONTIN	 207231_FED_stat_P 88.doc	 207231_FED_table_ P88.doc

BIOEQUIVALENCE COMMENTS TO BE PROVIDED TO THE APPLICANT

ANDA: 207231

APPLICANT: Inventia Healthcare Private Limited

DRUG PRODUCT: Iloperidone Tablets 1 mg, 2 mg, 4 mg, 6 mg, 8 mg, 10 mg, 12 mg

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

The bioequivalence comments provided in this communication are comprehensive as of issuance. However, these comments are subject to revision if additional concerns raised by chemistry, manufacturing and controls, microbiology, labeling, other scientific or regulatory issues or inspectional results arise in the future. Please be advised that these concerns 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}

Ethan M. Stier, Ph.D., R. Ph.
Director, Division of Bioequivalence II
Office of Bioequivalence
Office of Generic Drugs
Center for Drug Evaluation and Research