Contains Nonbinding Recommendations

Draft Guidance on Donepezil Hydrochloride

This draft guidance, once finalized, will represent the Food and Drug Administration's (FDA's) current thinking on this topic. It does not create or confer any rights for or on any person and does not operate to bind FDA or the public. You can use an alternative approach if the approach satisfies the requirements of the applicable statutes and regulations. If you want to discuss an alternative approach, contact the Office of Generic Drugs.

Active ingredient: Donepezil Hydrochloride

Form/Route: Tablet/Oral

Recommended studies: 2 Options: BCS Waiver or In-Vivo Studies

I. BCS Waiver option:

It may be possible to request a waiver of in-vivo testing for all strengths of this product provided that the appropriate documentation regarding high solubility, high permeability, and rapid dissolution as detailed in the Guidance for Industry: *Waiver of In Vivo Bioavailability and Bioequivalence for Immediate – Release Solid Oral Dosage Forms Based on the Biopharmaceutics Classification System* is submitted in the application. You may use information contained in the approved labeling of the reference product. Peer reviewed articles may not contain the necessary details of the testing for the Agency to make a judgment regarding the quality of the studies. A decision regarding the acceptability of the waiver request can only be made upon review of the data submitted in the application.

II. In-Vivo option:

1. Type of Study: Fasting
   Design: Single-dose, two-way, crossover in-vivo
   Strength: 10 mg
   Subjects: Healthy males and nonpregnant females, general population
   Additional comments:

2. Type of Study: Fed
   Design: Single-dose, two-way, crossover in-vivo
   Strength: 10 mg
   Subjects: Healthy males and nonpregnant females, general population
   Additional comments:

Analytes to measure: Donepezil in plasma

Bioequivalence based on (90% CI): Donepezil

Recommended May 2008; Revised Apr 2010
Waiver request of in vivo testing: 5 mg based on (i) acceptable bioequivalence studies on the 10 mg strength, (ii) acceptable in vitro dissolution testing of all strengths, and (iii) proportional similarity of the formulations across all strengths.

Dissolution test method and sampling times:

Please note that a Dissolution Methods Database is available to the public at the OGD website at http://www.accessdata.fda.gov/scripts/cder/dissolution/. Please find the dissolution information for this product at this website. Please conduct comparative dissolution testing on 12 dosage units each of all strengths of the test and reference products. Specifications will be determined upon review of the data submitted in the application.