

Contains Nonbinding Recommendations
Draft – Not for Implementation
Draft Guidance on Memantine Hydrochloride
October 2024

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Active Ingredient:	Memantine hydrochloride
Dosage Form:	Tablet
Route:	Oral
Strengths:	5 mg, 10 mg
Recommended Studies:	Two options: (1) Biopharmaceutics Classification System (BCS)-based biowaiver or (2) one in vivo bioequivalence study with pharmacokinetic endpoints

I. Option 1: BCS Class I-based biowaiver

A waiver request of in vivo testing for all the strengths of this product may be considered provided that the appropriate documentation regarding high solubility, high permeability and rapid dissolution as detailed in the most recent version of the FDA guidance for industry on *M9 Biopharmaceutics Classification System-Based Biowaivers^a* is submitted in the application. Applicants may use the information contained in the approved labeling of the reference listed drug (RLD). 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 assessment of the data submitted in the application.

II. Option 2: One in vivo bioequivalence study with pharmacokinetic endpoints

1. Type of study: Fasting
Design: Single-dose, two-way crossover in vivo
Strength: 10 mg
Subjects: Healthy males and non-pregnant, non-lactating females
Additional comments: Ensure an adequate washout period between treatments in the crossover study due to the long elimination half-life of memantine. Alternatively, a parallel study design may be considered.

Analyte to measure: Memantine in plasma

Bioequivalence based on (90% CI): Memantine

Waiver request of in vivo testing: 5 mg strength based on (i) acceptable bioequivalence study on the 10 mg strength, (ii) acceptable in vitro dissolution testing of both strengths, and (iii) proportional similarity of the formulations between both strengths

Dissolution test method and sampling times: The dissolution information for this drug product can be found in the FDA's Dissolution Methods database, <http://www.accessdata.fda.gov/scripts/cder/dissolution>. Conduct comparative dissolution testing on 12 dosage units for each of both strengths of the test product and RLD.¹ Specifications will be determined upon review of the abbreviated new drug application.

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^a For the most recent version of a guidance, check the FDA guidance website at <https://www.fda.gov/regulatory-information/search-fda-guidance-documents>.

¹ If the RLD is not available, refer to the most recent version of the FDA guidance for industry on *Referencing Approved Drug Products in ANDA Submissions*.