

**Draft Guidance on Clobazam**

**October 2024**

This draft guidance, when finalized, will represent the current thinking of the Food and Drug Administration (FDA, or the Agency) on this topic. It does not establish any rights for any person and is not binding on FDA or the public. You can use an alternative approach if it satisfies the requirements of the applicable statutes and regulations. To discuss an alternative approach, contact the Office of Generic Drugs.

In general, FDA's guidance documents do not establish legally enforceable responsibilities. Instead, guidances describe the Agency's current thinking on a topic and should be viewed only as recommendations, unless specific regulatory or statutory requirements are cited. The use of the word *should* in Agency guidances means that something is suggested or recommended, but not required.

---

**Active Ingredient:** Clobazam

**Dosage Form:** Tablet

**Route:** Oral

**Strengths:** 5 mg, 10 mg, 20 mg

**Recommended Study:** One in vivo bioequivalence study with pharmacokinetic endpoints

1. Type of study: Fasting  
Design: Single-dose, two-treatment, two-period crossover in vivo  
Strength: 20 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 clobazam. Alternatively, a parallel study design may be considered.

**Analytes to measure:** Clobazam and its active metabolite, N-desmethyclobazam in plasma

Submit the metabolite data as supportive evidence of comparable therapeutic outcome. For the metabolite, the following data should be submitted: individual and mean concentrations, individual and mean pharmacokinetic parameters, and geometric means and ratios of means for AUC and C<sub>max</sub>.

**Bioequivalence based on (90% CI):** Clobazam

**Waiver request of in vivo testing:** 5 mg and 10 mg strengths based on (i) acceptable bioequivalence study on the 20 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:** 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 all strengths of the test product and reference listed drug (RLD).<sup>1</sup> Specifications will be determined upon review of the abbreviated new drug application.

---

**Document History:** Recommended November 2013; Revised October 2024

**Unique Agency Identifier:** PSG\_202067

---

<sup>1</sup> 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*.