Draft Guidance on Upadacitinib
August 2022

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This guidance, which interprets the Agency’s regulations on bioequivalence at 21 CFR part 320, provides product-specific recommendations on, among other things, the design of bioequivalence studies to support abbreviated new drug applications (ANDAs) for the referenced drug product. FDA is publishing this guidance to further facilitate generic drug product availability and to assist the generic pharmaceutical industry with identifying the most appropriate methodology for developing drugs and generating evidence needed to support ANDA approval for generic versions of this product.

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In March 2020, FDA issued a draft product-specific guidance for industry on generic upadacitinib. We are now issuing revised draft guidance for industry that replaces the previously issued guidance.

Active Ingredient: Upadacitinib

Dosage Form; Route: Tablet, extended release; oral

Recommended Studies: Two in vivo bioequivalence studies with pharmacokinetic endpoints

1. Type of study: Fasting
Design: Single-dose, two-treatment, two-period crossover in vivo
Strength: 45 mg
Subjects: Healthy males and non-pregnant, non-lactating females
Additional comments: Exclude subjects with latent tuberculosis or abnormal liver function tests or blood counts. Do not use live attenuated vaccines immediately prior to or during the study. Female subjects of reproductive potential should use non-hormonal contraceptives during the study and continue to use effective contraceptives for 4 weeks after the last dose.
2. **Type of study:** Fed  
   **Design:** Single-dose, two-treatment, two-period crossover in vivo  
   **Strength:** 45 mg  
   **Subjects:** Healthy males and non-pregnant, non-lactating females  
   **Additional comments:** See comments above.

**Analyte to measure:** Upadacitinib in plasma

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

**Waiver request of in vivo testing:** Bioequivalence of the 15 mg and 30 mg strengths to the corresponding reference product strength may be demonstrated based on principles laid out in the most recent version of the FDA guidance for industry on *Bioequivalence Studies with Pharmacokinetic Endpoints for Drugs Submitted Under an Abbreviated New Drug Application.*

**Dissolution test method and sampling times:** For modified release drug products, applicants should develop specific discriminating dissolution methods. Alternatively, applicants may use the dissolution method set forth in any related official United States Pharmacopeia (USP) drug product monograph, or in the FDA’s database, [http://www.accessdata.fda.gov/scripts/cder/dissolution/](http://www.accessdata.fda.gov/scripts/cder/dissolution/), provided that applicants submit adequate dissolution data supporting the discriminating ability of such a method. If a new dissolution method is developed, submit the dissolution method development and validation report with the complete information/data supporting the proposed method. Conduct comparative dissolution testing on 12 dosage units for each strength of the test and reference products. Specifications will be determined upon review of the ANDA.

In addition to the method above, submit dissolution profiles on 12 dosage units for each strength of the test and reference products generated using USP Apparatus 1 at 100 rpm and/or Apparatus 2 at 50 rpm in at least three dissolution media (e.g., pH 1.2, 4.5 and 6.8 buffer). Agitation speeds may be increased if appropriate. It is acceptable to add a small amount of surfactant if necessary. Include early sampling times of 1, 2, and 4 hours and continue every 2 hours until at least 80% of the drug is released to provide assurance against premature release of drug (dose dumping) from the formulation.

**Alcohol dose dumping studies:** Due to concerns of dose dumping of drug from this product when taken with alcohol, conduct additional dissolution testing on all strengths using various concentrations of ethanol in the dissolution medium as follows:

**Testing Conditions:** 900 mL, 0.1N HCl, USP Apparatus 1 (basket) at 100 rpm, with or without alcohol

**Test 1:** 12 units tested according to the proposed method (with 0.1 N HCl) with data collected every 15 minutes for a total of 2 hours

**Test 2:** 12 units analyzed by substituting 5% (v/v) of test medium with Alcohol USP and data collection every 15 minutes for a total of 2 hours
Test 3: 12 units analyzed by substituting 20% (v/v) of test medium with Alcohol USP and data collection every 15 minutes for a total of 2 hours

Test 4: 12 units analyzed by substituting 40% (v/v) of test medium with Alcohol USP and data collection every 15 minutes for a total of 2 hours

Conduct testing on both test and reference products accordingly, and provide data on individual unit, means, range and %CV.

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**Revision History:** Recommended March 2020; Revised August 2022

**Unique Agency Identifier:** PSG_211675

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\(^a\) For the most recent version of a guidance, check the FDA guidance web page at [https://www.fda.gov/regulatory-information/search-fda-guidance-documents](https://www.fda.gov/regulatory-information/search-fda-guidance-documents).