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Draft Guidance on Baclofen

February 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This draft guidance, when finalized, will represent the current thinking of the Food and Drug Administration (FDA, or the Agency) on this topic.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: Baclofen

Dosage Form: Granules

Route: Oral

Strengths: 5 mg/packet, 10 mg/packet, 20 mg/packet

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: 20 mg/packet
   Subjects: Healthy males and non-pregnant, non-lactating females
   Additional comments: The entire contents of the packet should be emptied into the mouth and swallowed with water. Due to drowsiness and sedation, subjects should avoid the operation of automobiles, other dangerous machinery, or activities made hazardous by decreased alertness during study.

2. Type of study: Fed
   Design: Single-dose, two-treatment, two-period crossover in vivo
   Strength: 20 mg/packet
   Subjects: Healthy males and non-pregnant, non-lactating females
   Additional comments: See comments above.

Analyte to measure: Baclofen in plasma

Bioequivalence based on (90% CI): Baclofen

Waiver request of in vivo testing: 5 mg/packet and 10 mg/packet strengths based on (i) acceptable bioequivalence studies on the 20 mg/packet 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 each of all strengths of the test and reference products. Specifications will be determined upon review of the abbreviated new drug application.

Product-specific testing conditions for in vitro feeding tube studies: The approved labeling for the reference product states that the product may be administered by a nasogastric (NG), gastrostomy (G) tube, percutaneous endoscopic gastrotomy (PEG) tube, and gastrojejunostomy (GJ) tube. Conduct the in vitro feeding tube studies, including comparative recovery testing, sedimentation volume and redispersibility testing, and in-use stability in designated dispersion media (i.e., apple juice and milk). For general procedures of in vitro feeding tube studies, refer to the most recent version of the FDA guidance for industry on *Oral Drug Products Administered Via Enteral Feeding Tube: In Vitro Testing and Labeling Recommendations*.[a]

Testing tubes: NG tube (8 French); G tube (12 French); PEG tube (14 French); GJ tube (16 French)

1. Three types of tube configurations including different materials and/or different designs, with at least one G tube tested with an inflated balloon design
2. Holding times of 0 and 2 hours

Sedimentation volume and redispersibility testing

In-use stability testing in designated dispersion media (i.e., apple juice and milk)

Document History: Recommended February 2024

Unique Agency Identifier: PSG_215422

[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.