

*Contains Nonbinding Recommendations*  
*Draft – Not for Implementation*  
**Draft Guidance on Lenacapavir Sodium**  
**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This draft guidance, when finalized, will represent the current thinking of the Food and Drug Administration (FDA, or the Agency) on this topic.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.

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<b>Active Ingredient:</b>	Lenacapavir sodium
<b>Dosage Form:</b>	Solution
<b>Route:</b>	Subcutaneous
<b>Strength:</b>	EQ 463.5 mg Base/1.5 mL (EQ 309 mg Base/mL)
<b>Recommended Study:</b>	Request for waiver of in vivo bioequivalence study requirements

To qualify for a waiver from submitting an in vivo bioequivalence study on the basis that bioequivalence is self-evident under 21 CFR 320.22(b), the test product should be qualitatively (Q1)<sup>1</sup> and quantitatively (Q2)<sup>2</sup> the same as the reference listed drug (RLD).

An applicant may seek approval of a drug product that differs from the RLD in preservative, buffer, or antioxidant provided the applicant identifies and characterizes the differences and provides information demonstrating that the differences do not affect the safety or efficacy of the proposed drug product.<sup>3</sup>

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<sup>1</sup> Q1 (Qualitative sameness) means that the test product uses the same inactive ingredient(s) as the RLD product.

<sup>2</sup> Q2 (Quantitative sameness) means that concentrations of the inactive ingredient(s) used in the test product are within ± 5% of those used in the RLD product.

<sup>3</sup> 21 CFR 314.94(a)(9)(iii).

## **Additional comments:**

### **Device:**

The RLD is presented as a kit that consists of two vials, two vial adapters, two syringes, and two injection needles with needle guards. The vial adapter, syringe, and injection needle with needle guard are the device constituent parts.

FDA recommends that prospective applicants examine the size and shape, the external critical design attributes, and the external operating principles of the RLD device when designing the Test device including:

- Single-use syringe format, one syringe per injection
- Vial adapter, one device per drug vial
- Needle gauge and length
- Needle guard system

### **User interface assessment:**

An abbreviated new drug application for this product should include complete comparative analyses so FDA can determine whether any differences in design for the user interface of the proposed generic product, as compared to the RLD, are acceptable and whether the product can be expected to have the same clinical effect and safety profile as the RLD when administered to patients under the conditions specified in the labeling. For additional information, refer to the most recent version of the FDA guidance for industry on *Comparative Analyses and Related Comparative Use Human Factors Studies for a Drug-Device Combination Product Submitted in an ANDA*.<sup>a</sup>

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