

**TOPICAL DERMATOLOGIC CORTICOSTEROIDS IN VIVO  
BIOEQUIVALENCE STUDY SUMMARY TABLES AND SAS TRANSPORT  
FORMATTED TABLES FOR DATASET SUBMISSION**

**I. Pre-Study Method Validation**

**Table 1. Chroma Meter Validation**

Reading	Chroma Meter 1	Chroma Meter 2	Chroma Meter 3	Chroma Meter n
Date of testing				
Replicate 1				
Replicate 2				
Replicate 3				
Replicate 4				
Mean				
% CV				
Inter-Chroma Meter, Mean				
Inter-Chroma Meter, % CV				

**Table 2. Skin Site Validation**

Reading	Site 1	Site 2	Site 3	Site n
Date of testing				
Replicate 1				
Replicate 2				
Replicate 3				
Replicate 4				
Mean				
%CV				
Inter-Site, Mean				
Inter-Site, %CV				

**Table 3. Intra-Subject and Inter-Site Validation**

<b>Reading</b>	<b>Subject 1</b>	<b>Subject 2</b>	<b>Subject 3</b>	<b>Subject n</b>
<b>Date of testing</b>				
<b>Site 1</b>				
<b>Site 2</b>				
<b>Site 3</b>				
<b>Site 4</b>				
<b>Mean</b>				
<b>% CV</b>				
<b>Inter-Subject, Mean</b>				
<b>Inter-Subject, % CV</b>				

**Table 4. Operator Validation**

<b>Reading</b>	<b>Operator 1</b>	<b>Operator 2</b>	<b>Operator 3</b>	<b>Operator n</b>
<b>Date of testing</b>				
<b>Site 1</b>				
<b>Site 2</b>				
<b>Site 3</b>				
<b>Site 4</b>				
<b>Mean</b>				
<b>%CV</b>				
<b>Inter-Operator, Mean</b>				
<b>Inter-Operator, %CV</b>				

**II. Summary of Studies**

**Table 5. Summary of the Pilot Dose Duration-Response Study**

Study Ref. No.	Study Objective	Study Design	Treatment(s) (Dose, Dosage Form, Route) [Product ID]	Subjects No. (M/F) Type Age: Mean (Range)	Mean Parameters		Study Report Location
					E <sub>max</sub>	ED <sub>50</sub> (minutes)	

**Table 6. Summary of the Pivotal Bioequivalence Study**

Study Ref. No.	Study Objective	Study Design	Treatments (Dose, Dosage Form, Route) [Product ID]	Subjects No. (M/F) Type Age: Mean (Range)	Mean Parameter	Study Report Location
					Negative AUEC (n=# 'evaluable' subjects)	
					Test:	
					Reference:	

**Table 7. Summary of the Pivotal Bioequivalence Study**

Treatment Dose: XX per site: Occlusion/Non-Occlusion Pharmacodynamic Parameters, Area Under the Effect Curve, Point Estimates and 90% Confidence Intervals (Locke's Method)					
Pivotal (Vasoconstrictor Study), Study No.					
Method	Number of Subjects	AUEC <sub>(0-24hr)</sub>		Point Estimate	90% C.I.
		Test	Reference		
Calculated by Firm					

**Table 8. Listing of Relevant Standard Operating Procedures for Pre-Study Method Validation and Pilot Dose Duration-Response and Pivotal BE Studies**

SOP No.	Effective Date of SOP	SOP Title

### III. Pilot Dose Duration-Response Study

**Table 9. Study Information**

<b>Study Number</b>	
<b>Study Title</b>	
<b>Clinical Site (Name &amp; Address)</b>	
<b>Principal Investigator</b>	
<b>Dosing Dates</b>	
<b>Were the subjects dosed in more than group?</b>	Yes/No (If Yes, then answer the rest of the questions in this section)
<b>If Yes, specify the screening dates for each group</b>	
<b>If Yes, specify the dosing dates for each group</b>	
<b>If specify, specify whether the same clinical sites were used for each group</b>	

**Table 10. Product Information**

<b>Product</b>	<b>Reference</b>
<b>Treatment ID</b>	
<b>Product Name</b>	
<b>Manufacturer</b>	
<b>Batch/Lot No.</b>	
<b>Expiration Date</b>	
<b>Strength</b>	
<b>Dosage Form</b>	
<b>Potency</b>	
<b>Homogeneity</b>	If applicable
<b>Dose Administered</b>	(e.g. 5.0 $\mu\text{L}/\text{cm}^2$ (20 $\mu\text{L}$ total/4- $\text{cm}^2$ site))(e.g.)
<b>Route of Administration</b>	

**Table 11. Demographics Profile of Subjects Completing the Pilot Dose Duration-Response Study Product Information**

Study #		
		Treatment Groups
		Reference Product N=
Age (years)	Mean ± SD Range	
Age Groups	< 18 18 – 39 40 – 64 65 – 75 > 75	
Sex	Male Female	
Hispanic or Latino Race	N A B I W	
Not Hispanic or Latino Race	N A B I W	
BMI	Mean ± SD Range	
Other Factors		

**Table 12. Dropout Information, Pilot Dose Duration-Response Study**

Study #				
Subject No	Reason for dropout/replacement	Period	Replaced?	Replaced with

**Table 13. Study Adverse Events, Pilot Dose Duration-Response Study**

Body System/Adverse Event	Study #
	Reference Product N=
	n (%)

**Table 14. Protocol Deviations, Pilot Dose Duration-Response Study**

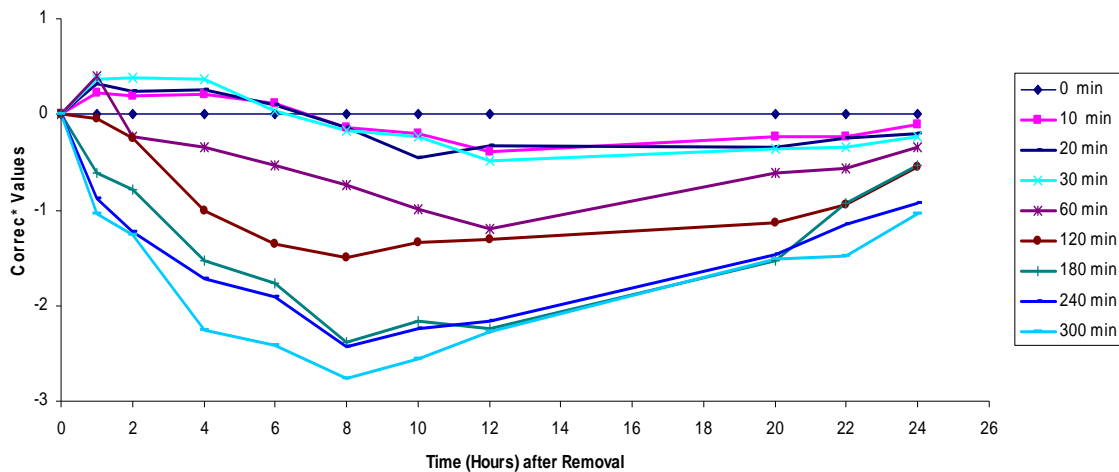
Study #	
Type	Subject #s

**Table 15. ED<sub>50</sub> and Emax Values Calculated**

Model	Software Used	Assumption of Distribution (ED <sub>50</sub> ) (Normal/Log Normal)			
Initial Population Parameter Estimates		Final Population Parameter (Model Derived) Estimates			
ED <sub>50</sub>	Emax	ED <sub>50</sub>	Emax	Maximum Likelihood	Akaike Criteria Value

**Figure 1. Graphical Representation of Time After Drug Removal versus Mean Corrected Values**

**Example:**



#### IV. Pivotal Bioequivalence Study

**Table 16. Study Information**

<b>Study Number</b>	
<b>Study Title</b>	
<b>Clinical Site (Name &amp; Address)</b>	
<b>Principal Investigator</b>	
<b>Dosing Dates</b>	
<b>Were the subjects dosed in more than group?</b>	Yes/No (If Yes, then answer the rest of the questions in this section)
<b>If Yes, specify the screening dates for each group</b>	
<b>If Yes, specify the dosing dates for each group</b>	
<b>If specify, specify whether the same clinical sites were used for each group</b>	

**Table 17. Product Information**

<b>Product</b>	<b>Test</b>	<b>Reference</b>
<b>Treatment ID</b>		
<b>Product Name</b>		
<b>Manufacturer</b>		
<b>Batch/Lot No.</b>		
<b>Manufacture Date</b>		
<b>Expiration Date</b>		
<b>Strength</b>		
<b>Dosage Form</b>		
<b>Bio-batch Size</b>		
<b>Production Batch Size</b>		
<b>Potency</b>		
<b>Homogeneity</b>	If applicable	If applicable
<b>Dose Administered</b>	(e.g. 5.0 µL/cm <sup>2</sup> (20µL total/4-cm <sup>2</sup> site))(e.g.)	(e.g. 5.0 µL/cm <sup>2</sup> (20µL total/4-cm <sup>2</sup> site))(e.g.)
<b>Route of Administration</b>		

**Table 18. Demographics Profile of Subjects Completing the Pivotal Bioequivalence Study**

Study #			
		Treatment Groups	
		Test Product N=	Reference Product N=
Age (years)	Mean ± SD Range		
Age Groups	< 18 18 – 39 40 – 64 65 – 75 > 75		
Sex	Male Female		
Hispanic or Latino Race	N A B I W		
Not Hispanic or Latino Race	N A B I W WB		
BMI	Mean ± SD Range		
Other Factors			

**Table 19. Dropout Information, Pivotal Bioequivalence Study**

Study #				
Subject No	Reason for dropout/replacement	Period	Replaced?	Replaced with



**Table 20. Study Adverse Events, Pivotal Bioequivalence Study**

Body System/Adverse Event	Reported Incidence by Treatment Groups		
	Study #		
	Test Product A: N=	Reference Product B: N=	Not Assignable N=
	n (%)	n (%)	n (%)

**Table 21. Protocol Deviations, Pivotal Bioequivalence Study**

Study #		
Type	Subject #s (Test)	Subject #s (Ref.)

**Table 22. Area Under the Effect Curve and 90% Confidence Intervals**

Name of Drug Product Dose: [XXX µL per site – Non Occluded/Occluded, ___ minutes] Pharmacodynamic Parameters, Area Under the Effective-Dose Curve, Point Estimates and 90% Confidence Intervals (Locke’s Method)				
Pivotal (Vasoconstrictor Assay) Study (Study No.)				
Number of Subjects <sup>1</sup>	AUEC <sub>(0-24h)</sub>		Point Estimate	90% CI
	Test	Reference		

**Table 23. Test Product Formulation**

Ingredient	Function	% W/W

<sup>1</sup> Number of subjects who meet the criterion of the D2 response/D1 response ≥ 1.25

**V. SAS Transport Formatted Tables for Data Submission for Pilot Dose Duration-Response Study and Pivotal Bioequivalence Study**

**Definitions:**

Variable Name	Variable Label	Variable Type	Notes
<b>DD</b>	Dose Duration	Numeric (minutes)	A dose measured as the duration of exposure of the drug to the skin over a specified time period
<b>ED50</b>	Half-Maximal Effect Dose	Numeric (minutes)	The dose duration at which half-maximal skin blanching effect occurs
<b>D1</b>	Shorter Dose Duration Calibrator	Numeric (minutes)	The dose duration equal to one-half of the ED50
<b>D2</b>	Longer Dose Duration Calibrator	Numeric (minutes)	The dose duration equal to two times the ED50

**Note:** From Tables 24 to Tables 31, please refer to the **Guidance for Industry – Topical Dermatologic Corticosteroids: In Vivo Bioequivalence**, finalized June 2, 1995, <http://www.fda.gov/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/ucm064964.htm>

**V.1 Pilot Dose Duration-Response Study Data Submission Format**

**Table 24. Chroma Meter Raw Data**

Subject	Time after drug removal (hours)	DD0 (Untreated sites)	DD1	DD2	DD3	DDn
1	Baseline (pre-dose)*					
1	0					
1	0.5					
1	1					
1	n					
2	Baseline (pre-dose)					
2	0					
2	0.5					
2	1					
2	n					
n	Baseline(pre-					

	dose)					
n	0					
n	0.5					
n	1					
n	n					

\*Baseline reading is within one hour prior to drug application

**Example:**

Subject	Time after drug removal (hours)	DD0 (Untreated sites)	DD1	DD2	DD3	DDn
1	Baseline (pre-dose)	9.86	10.36	9.59	9.34	9.43
1	0	9.99	9.89	8.77	8.66	9.6
1	0.5	10.10	10.38	9.35	8.53	9.99
1	1	9.52	10.32	9.27	8.04	9.93
1	n	9.65	10.04	9.82	9.82	10.23
2	Baseline (pre-dose)	10.12	8.89	9.18	9.24	9.15
2	0	10.28	8.28	9.61	9.54	9.24
2	0.5	10.25	8.36	9.30	10.24	10.52
2	1	10.68	7.89	8.92	10.34	10.78
2	n	11.21	8.03	10.61	11.40	10.89

**Table 25. Baseline-Adjusted, Chroma Meter Raw Data**

Subject	Time after drug removal (hours)	DD0 (Untreated sites)	DD1	DD2	DD3	DDn
1	0					
1	0.5					
1	1					
1	n					
2	0					
2	0.5					
2	1					
2	n					
n	0					
n	0.5					
n	1					
n	n					

**Table 26. Baseline-Adjusted, Untreated Site-Corrected Chroma Meter Raw Data**

Subject	Time after drug removal (hours)	DD1	DD2	DD3	DDn
1	0				
1	0.5				
1	1				
1	n				
2	0				
2	0.5				
2	1				
2	n				
n	0				
n	0.5				
n	1				
n	n				

**Table 27. Area Under Effect Curve Data, All Subjects at Each Dose Duration**

Subject	DD1	DD2	DD3	DDn
1				
2				
n				

**V.2 Pivotal Bioequivalence Study Data Submission Format**

**Table 28. Chroma Meter Raw Data**

Subject	Time after drug removal (hours)	DD0 (Untreated sites)	D1	D2	ED50 (T)	ED50 (R)
1	Baseline (pre-dose)					
1	0					
1	0.5					
1	1					
1	n					
2	Baseline (pre-dose)					
2	0					
2	0.5					
2	1					
2	n					

n	Baseline(pre-dose)					
n	0					
n	0.5					
n	1					
n	n					

**Table 29. Baseline-Adjusted, Chroma Meter Raw Data**

Subject	Time after drug removal (hours)	DD0 (Untreated sites)	D1	D2	ED50 (T)	ED50 (R)
1	0					
1	0.5					
1	1					
1	n					
2	0					
2	0.5					
2	1					
2	n					
n	0					
n	0.5					
n	1					
n	n					

**Table 30. Baseline-Adjusted, Untreated Site-Corrected, Chroma Meter Raw Data**

Subject	Time after drug removal (hours)	D1	D2	ED50 (T)	ED50 (R)
1	0				
1	0.5				
1	1				
1	n				
2	0				
2	0.5				
2	1				
2	n				
n	0				
n	0.5				
n	1				
n	n				

**Table 31. Area Under Effect Curve Data, All Subjects at Each Dose Duration**

<b>Subject</b>	<b>D1</b>	<b>D2</b>	<b>ED50 (T)</b>	<b>ED50 (R)</b>
1				
2				
n				