# ANDA CHECKLIST FOR CTD or eCTD FORMAT FOR COMPLETENESS and ACCEPTABILITY of an APPLICATION FOR FILING

For More Information on Submission of an ANDA in Electronic Common Technical Document (eCTD) Format please go to: <a href="http://www.fda.gov/cder/regulatory/ersr/ectd.htm">http://www.fda.gov/cder/regulatory/ersr/ectd.htm</a>
\*For a Comprehensive Table of Contents Headings and Hierarchy please go to: <a href="http://www.fda.gov/cder/regulatory/ersr/5640CTOC-v1.2.pdf">http://www.fda.gov/cder/regulatory/ersr/5640CTOC-v1.2.pdf</a>

\*\* For more CTD and eCTD informational links see the final page of the ANDA Checklist
\*\*\* A model Quality Overall Summary for an immediate release tablet and an extended release
capsule can be found on the OGD webpage http://www.fda.gov/cder/ogd/

| ANDA #:  | FIRM NAME:                     |               |                |                  |             |         |
|--|--------------------------------|---------------|----------------|------------------|-------------|---------|
| PIV:   | ELECTRONIC                     | OR PAPER S    | SUBMISSION     | 1:               |             |         |
| RELATED APPLICA  | TION(S):                       | Bio Assignn   | nents:         | ☐ Mie            | cro Review  |         |
| First Generic Product                                    | Received?                      | ВРН           | BCE            |                  | cro review  |         |
| DRUG NAME:   |                                | BST           | BDI            |                  |             |         |
| DOSAGE FORM:   | '                              |               |                |                  |             |         |
| Random Queue:<br>Chem Team Leader:                       | P                              | PM:           | Labeling       | Reviewe          | r:          |         |
| Letter Date:   | I                              | Received Date |                |                  |             |         |
| Comments: Therapeutic Code:                              | On Ca                          | ards:         |                |                  |             |         |
| Archival copy: Review copy: Not applicable to electronic | Sections E-Media D ic sections |               |                |                  |             |         |
| PART 3 Combination                                       | _                              | •             | the Part 3 Cor | mhination        | a Algorithm |         |
| (Must be completed for ALL                               | Original Applications)         | Kelel to      | the Part 5 Cor | HOHIAHOI         | i Aigoriumi |         |
| Reg. Support Reviewer                                    |                                |               |                | nendation<br>TLE | REFUSE to   | RECEIVE |
|  |                                |               |                |                  |             |         |
| ADDITIONAL COM   | IMENTS REGAR                   | DING THE A    | NDA:           |                  |             |         |

## MODULE 1 ADMINISTRATIVE

|         | ACCEPT  | ABLE |
|---------|---|------|
| 1.1     | 1.1.2 Signed and Completed Application Form (356h) (original signature) (Check Rx/OTC Status)   |      |
| 1.2     | Cover Letter  |      |
| *       | Table of Contents (paper submission only)   |      |
| 1.3.2   | Field Copy Certification (original signature) (N/A for E-Submissions)   |      |
| 1.3.3   | Debarment Certification-GDEA (Generic Drug Enforcement Act)/Other:  1. Debarment Certification (original signature)  2. List of Convictions statement (original signature)  |      |
| 1.3.4   | Financial Certifications Bioavailability/Bioequivalence Financial Certification (Form FDA 3454) Disclosure Statement (Form FDA 3455, submit copy to Regulatory Branch Chief)  |      |
| 1.3.5   | 1.3.5.1 Patent Information Patents listed for the RLD in the Electronic Orange Book Approved Drug Products with Therapeutic Equivalence Evaluations 1.3.5.2 Patent Certification 1. Patent number(s) 2. Paragraph: (Check all certifications that apply) MOU PI PII PIII  PIV (Statement of Notification) 3. Expiration of Patent(s): a. Pediatric exclusivity submitted? b. Expiration of Pediatric Exclusivity? 4. Exclusivity Statement: |      |
| 1.4.1   | References Letters of Authorization 1. DMF letters of authorization a. Type II DMF authorization letter(s) or synthesis for Active Pharmaceutical Ingredient b. Type III DMF authorization letter(s) for container closure 2. US Agent Letter of Authorization (U.S. Agent [if needed, countersignature on 356h])   |      |
| 1.12.11 | Basis for Submission NDA#: Ref Listed Drug: Firm: ANDA suitability petition required? If Yes, then is change subject to PREA (change in dosage form, route or active ingredient) see section 1.9.1  |      |

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| 1.12.12 | Comparison between Generic Drug and RLD-505(j)(2)(A)  1. Conditions of use 2. Active ingredients 3. Inactive ingredients 4. Route of administration 5. Dosage Form 6. Strength   |  |
|---------|--|--|
| 1.12.14 | Environmental Impact Analysis Statement  |  |
| 1.12.15 | Request for Waiver Request for Waiver of In-Vivo BA/BE Study(ies):   |  |
| 1.14.1  | Draft Labeling (Mult Copies N/A for E-Submissions)  1.14.1.1 4 copies of draft (each strength and container)  1.14.1.2 1 side by side labeling comparison of containers and carton with all differences annotated and explained  1.14.1.3 1 package insert (content of labeling) submitted electronically  ***Was a proprietary name request submitted?  (If yes, send email to Labeling Reviewer indicating such) |  |
| 1.14.3  | Listed Drug Labeling 1.14.3.1 1 side by side labeling (package and patient insert) comparison with all differences annotated and explained 1.14.3.3 1 RLD label and 1 RLD container label  |  |

MODULE 2 SUMMARIES

**ACCEPTABLE** 2.3 **Quality Overall Summary (QOS) E-Submission: PDF** Word Processed e.g., MS Word A model Quality Overall Summary for an immediate release tablet and an extended release capsule can be found on the OGD webpage http://www.fda.gov/cder/ogd/ **Question based Review (QbR)** 2.3.S **Drug Substance (Active Pharmaceutical Ingredient)** 2.3.S.1 General Information 2.3.S.2 Manufacture 2.3.S.3 Characterization 2.3.S.4 Control of Drug Substance 2.3.S.5 Reference Standards or Materials 2.3.S.6 Container Closure System 2.3.S.7 Stability 2.3.P **Drug Product** 2.3.P.1 Description and Composition of the Drug Product 2.3.P.2 Pharmaceutical Development 2.3.P.2.1 Components of the Drug Product 2.3.P.2.1.1 Drug Substance **2.3.P.2.1.2** Excipients 2.3.P.2.2 Drug Product 2.3.P.2.3 Manufacturing Process Development 2.3.P.2.4 Container Closure System 2.3.P.3 Manufacture 2.3.P.4 Control of Excipients 2.3.P.5 Control of Drug Product 2.3.P.6 Reference Standards or Materials 2.3.P.7 Container Closure System 2.3.P.8 Stability 2.7 Clinical Summary (Bioequivalence) E-Submission: PDF Word Processed e.g., MS Word 2.7.1 Summary of Biopharmaceutic Studies and Associated Analytical Methods 2.7.1.1 Background and Overview Table 1. Submission Summary Table 4. Bioanalytical Method Validation Table 6. Formulation Data 2.7.1.2 Summary of Results of Individual Studies Table 5. Summary of In Vitro Dissolution 2.7.1.3 Comparison and Analyses of Results Across Studies Table 2. Summary of Bioavailability (BA) Studies Table 3. Statistical Summary of the Comparative BA Data **2.7.1.4 Appendix** 2.7.4.1.3 Demographic and Other Characteristics of Study Population Table 7. Demographic Profile of Subjects Completing the Bioequivalence Study 2.7.4.2.1.1 Common Adverse Events Table 8. Incidence of Adverse Events in Individual Studies

| 3.2.S.1 | General Information 3.2.S.1.1 Nomenclature 3.2.S.1.2 Structure 3.2.S.1.3 General Properties   |  |
|---------|---|--|
| 3.2.S.2 | Manufacturer 3.2.S.2.1  Manufacturer(s) (This section includes contract manufacturers and testing labs)  Drug Substance (Active Pharmaceutical Ingredient)  1. Name and Full Address(es)of the Facility(ies)  2. Function or Responsibility  3. Type II DMF number for API  4. CFN or FEI numbers   |  |
| 3.2.S.3 | Characterization  |  |
| 3.2.S.4 | Control of Drug Substance (Active Pharmaceutical Ingredient) 3.2.S.4.1 Specification  Testing specifications and data from drug substance manufacturer(s) 3.2.S.4.2 Analytical Procedures 3.2.S.4.3 Validation of Analytical Procedures  1. Spectra and chromatograms for reference standards and test samples 2. Samples-Statement of Availability and Identification of: a. Drug Substance b. Same lot number(s) 3.2.S.4.4 Batch Analysis 1. COA(s) specifications and test results from drug substance mfgr(s) 2. Applicant certificate of analysis 3.2.S.4.5 Justification of Specification |  |
| 3.2.S.5 | Reference Standards or Materials  |  |
| 3.2.S.6 | Container Closure Systems   |  |
| 3.2.S.7 | Stability   |  |

| 1. Unit composition 2. Inactive ingredients and amounts are appropriate per IIG  |  |
|--|--|
| 3.2.P.2 Pharmaceutical Development Pharmaceutical Development Report   |  |
| 3.2.P.3  Manufacture 3.2.P.3.1 Manufacture(s) (Finished Dosage Manufacturer and Outside Contract Testing Laboratories)  1. Name and Full Address(es) of the Facility(ies) 2. CGMP Certification: 3. Function or Responsibility 4. CFN or FEI numbers 3.2.P.3.2 Batch Formula 3.2.P.3.3 Description of Manufacturing Process and Process Controls 1. Description of the Manufacturing Process 2. Master Production Batch Record(s) for largest intended production runs (no more than 10x pilot batch) with equipment specified 3. If sterile product: Aseptic fill / Terminal sterilization 4. Reprocessing Statement 3.2.P.3.4 Controls of Critical Steps and Intermediates 3.2.P.3.5 Process Validation and/or Evaluation 1. Microbiological sterilization validation 2. Filter validation (if aseptic fill) |  |
| 3.2.P.4 Controls of Excipients (Inactive Ingredients) Source of inactive ingredients identified 3.2.P.4.1 Specifications  1. Testing specifications (including identification and characterization) 2. Suppliers' COA (specifications and test results) 3.2.P.4.2 Analytical Procedures 3.2.P.4.3 Validation of Analytical Procedures 3.2.P.4.4 Justification of Specifications  |  |

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| 3.2.P.5 | Controls of Drug Product  |  |
|---------|---|--|
|         | 3.2.P.5.1 Specification(s)  |  |
|         | 3.2.P.5.2 Analytical Procedures   |  |
|         | 3.2.P.5.3 Validation of Analytical Procedures Samples - Statement of Availability and Identification of:  1. Finished Dosage Form |  |
|         | 2. Same lot numbers   |  |
|         | 3.2.P.5.4 Batch Analysis  |  |
|         | Certificate of Analysis for Finished Dosage Form  |  |
|         | 3.2.P.5.5 Characterization of Impurities  |  |
|         | 3.2.P.5.6 Justification of Specifications   |  |
|         |   |  |
| 3.2.P.7 | Container Closure System  |  |
|         | 1. Summary of Container/Closure System (if new resin, provide data)   |  |
|         | 2. Components Specification and Test Data   |  |
|         | 3. Packaging Configuration and Sizes  |  |
|         | 4. Container/Closure Testing  |  |
|         | 5. Source of supply and suppliers address   |  |
| 3.2.P.8 | 3.2.P.8.1 Stability (Finished Dosage Form)  |  |
|         | 1. Stability Protocol submitted   |  |
|         | 2. Expiration Dating Period   |  |
|         | 3.2.P.8.2 Post-approval Stability and Conclusion  |  |
|         | Post Approval Stability Protocol and Commitments  |  |
|         | 3.2.P.8.3 Stability Data  |  |
|         | 1. 3 month accelerated stability data   |  |
|         | 2. Batch numbers on stability records the same as the test batch  |  |

#### **MODULE 3**

### 3.2.R Regional Information

**ACCEPTABLE** 3.2.R 3.2.R.1.S Executed Batch Records for drug substance (if available) (Drug 3.2.R.2.S Comparability Protocols Substance) 3.2.R.3.S Methods Validation Package Methods Validation Package (3 copies) (Mult Copies N/A for E-Submissions) (Required for Non-USP drugs) 3.2.R 3.2.R.1.P.1 (Drug **Executed Batch Records** Product) Copy of Executed Batch Record with Equipment Specified, including Packaging Records (Packaging and Labeling Procedures) Batch Reconciliation and Label Reconciliation Theoretical Yield Actual Yield Packaged Yield 3.2.R.1.P.2 Information on Components 3.2.R.2.P Comparability Protocols 3.2.R.3.P Methods Validation Package

#### MODULE 5

(Required for Non-USP drugs)

| CLIN                        | NICAL STUDY REPORTS   | ACCEPTABL | LE |
|-----------------------------|---|-----------|----|
| 5.2                         | Tabular Listing of Clinical Studies E-Submission: PDF Word Processed e.g., MS Word  |           |    |
| 5.3.1 (complete study data) | Bioavailability/Bioequivalence  1. Formulation data same?  a. Comparison of all Strengths (check proportionality of multiple strengths)  b. Parenterals, Ophthalmics, Otics and Topicals  per 21 CFR 314.94 (a)(9)(iii)-(v)  2. Lot Numbers of Products used in BE Study(ies):  3. Study Type: (Continue with the appropriate study type box below) |           |    |

Methods Validation Package (3 copies) (Mult Copies N/A for E-Submissions)

|            | 5.3.1.2 Comparative BA/BE Study Reports   |  |
|------------|---|--|
|            | 1. Study(ies) meets BE criteria (90% CI of 80-125, C max, AUC)  |  |
|            | 2. Summary Bioequivalence tables:   |  |
|            | Table 10. Study Information   |  |
|            | Table 12. Dropout Information   |  |
|            | Table 13. Protocol Deviations   |  |
|            | 5.3.1.3   |  |
|            | In Vitro-In-Vivo Correlation Study Reports  |  |
|            | Summary Bioequivalence tables:  |  |
|            | Table 11. Product Information   |  |
|            | Table 16. Composition of Meal Used in Fed Bioequivalence Study  |  |
|            | 5.3.1.4   |  |
|            | Reports of Bioanalytical and Analytical Methods for Human Studies   |  |
|            | 1. Summary Bioequivalence table:  |  |
|            | Table 9. Reanalysis of Study Samples  |  |
|            | Table 14. Summary of Standard Curve and QC Data for Bioequivalence Sample                                   |  |
|            | Analyses  |  |
|            | Table 15. SOPs Dealing with Bioanalytical Repeats of Study Samples  |  |
|            | 5.3.7   |  |
|            | Case Report Forms and Individual Patient Listing  |  |
| 5.4        |   |  |
| <b>5.4</b> | Literature References   |  |
|            | Possible Study Types:   |  |
|            | IN-VIVO BE STUDY(IES) with PK ENDPOINTS (i.e., fasting/fed/sprinkle)  |  |
| Study Type | 1. Study(ies) meets BE criteria (90% CI of 80-125, C max, AUC)  |  |
|            |   |  |
|            | 2. EDR Email: Data Files Submitted: YES SENT TO EDR   |  |
|            | 3. In-Vitro Dissolution:  |  |
|            | IN-VIVO BE STUDY with CLINICAL ENDPOINTS  |  |
| Study Type | 1. Properly defined BE endpoints (eval. by Clinical Team)   |  |
|            | 2. Summary results meet BE criteria: 90% CI of the proportional difference in success rate between test and |  |
|            | reference must be within (-0.20, +0.20) for a binary/dichotomous endpoint. For a continuous endpoint, the   |  |
|            | test/reference ratio of the mean result must be within (0.80, 1.25).  |  |
|            | 3. Summary results indicate superiority of active treatments (test & reference) over vehicle/placebo        |  |
|            |   |  |
|            | (p<0.05) (eval. by Clinical Team)   |  |
|            | 4. EDR Email: Data Files Submitted  |  |
| Study Type |   |  |
| Study Type | IN-VITRO BE STUDY(IES) (i.e., in vitro binding assays)  |  |
|            | 1. Study(ies) meets BE criteria (90% CI of 80-125)  |  |
|            | 2. EDR Email: Data Files Submitted:   |  |
|            | 3. In-Vitro Dissolution:  |  |
|            | 5. III THO DISSOLUTION.   |  |
|            |   |  |

| Study Type    | NASALLY ADMINISTERED DRUG PRODUCTS  1. Solutions (Q1/Q2 sameness):  a. In-Vitro Studies (Dose/Spray Content Uniformity, Droplet/Drug Particle Size Distrib., Spray Pattern, Plume Geometry, Priming & Repriming)  2. Suspensions (Q1/Q2 sameness):  a. In-Vivo PK Study  1. Study(ies) meets BE Criteria (90% CI of 80-125, C max, AUC)  2. EDR Email: Data Files Submitted  b. In-Vivo BE Study with Clinical End Points  1. Properly defined BE endpoints (eval. by Clinical Team)  2. Summary results meet BE criteria (90% CI within +/- 20% of 80-125)  3. Summary results indicate superiority of active treatments (test & reference) over vehicle/placebo (p<0.05) (eval. by Clinical Team)  4. EDR Email: Data Files Submitted  c. In-Vitro Studies (Dose/Spray Content Uniformity, Droplet/Drug Particle Size Distrib., Spray Pattern, Plume Geometry, Priming & Repriming) |  |
|---------------|---|--|
| Study<br>Type | IN-VIVO BE STUDY(IES) with PD ENDPOINTS (e.g., topical corticosteroid vasoconstrictor studies)  1. Pilot Study (determination of ED50)  2. Pivotal Study (study meets BE criteria 90%CI of 80-125)  |  |
| Study Type    | TRANSDERMAL DELIVERY SYSTEMS  1. In-Vivo PK Study  1. Study(ies) meet BE Criteria (90% CI of 80-125, C max, AUC)  2. In-Vitro Dissolution  3. EDR Email: Data Files Submitted  2. Adhesion Study  3. Skin Irritation/Sensitization Study  |  |

Updated 10/17/07