

CENTER FOR DRUG EVALUATION AND RESEARCH

Approval Package for:

APPLICATION NUMBER:

ANDA 207098

Name: Iloperidone (Tablet), 1MG, 2MG, 4MG, 6MG, 8MG,
10MG, 12MG

Sponsor: Taro Pharmaceutical Industries Limited

Approval Date: July 22, 2019

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
ANDA208891Orig1s000
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CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:

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APPROVAL LETTER



ANDA 207098

ANDA APPROVAL

Taro Pharmaceuticals U.S.A. Inc.
U.S. Agent for Taro Pharmaceutical Industries Limited
3 Skyline Drive
Hawthorne, NY 10532
Attention: Crystal Spinks, Ph.D.
Senior Manager, Regulatory Affairs

Dear Madam:

This letter is in reference to your abbreviated new drug application (ANDA) received for review on June 2, 2014, submitted pursuant to section 505(j) of the Federal Food, Drug, and Cosmetic Act (FD&C Act) for Iloperidone Tablets, 1 mg, 2 mg, 4 mg, 6 mg, 8 mg, 10 mg, and 12 mg.

Reference is also made to the complete response letter issued by this office on February 22, 2019, and to any amendments thereafter.

We have completed the review of this ANDA and have concluded that adequate information has been presented to demonstrate that the drug is safe and effective for use as recommended in the submitted labeling. Accordingly, the ANDA is **approved**, effective on the date of this letter. The Office of Bioequivalence has determined your Iloperidone Tablets, 1 mg, 2 mg, 4 mg, 6 mg, 8 mg, 10 mg, and 12 mg, to be bioequivalent and, therefore, therapeutically equivalent to the reference listed drug (RLD), Fanapt Tablets, 1 mg, 2 mg, 4 mg, 6 mg, 8 mg, 10 mg, and 12 mg, of Vanda Pharmaceuticals Inc. (Vanda).

The RLD upon which you have based your ANDA, Vanda's Fanapt Tablets, 1 mg, 2 mg, 4 mg, 6 mg, 8 mg, 10 mg, and 12 mg, is subject to periods of patent protection. The following patents and expiration dates are currently listed in the Agency's publication titled *Approved Drug Products with Therapeutic Equivalence Evaluations* (the "Orange Book"):

<u>U.S. Patent Number</u>	<u>Expiration Date</u>
8,586,610 (the '610 patent)	November 2, 2027
8,652,776 (the '776 patent)	August 31, 2030
8,999,638 (the '638 patent)	October 28, 2030
9,072,742 (the '742 patent)	January 16, 2031
9,074,254 (the '254 patent)	December 28, 2031
9,074,255 (the '255 patent)	December 17, 2030

9,074,256 (the '256 patent)	February 10, 2031
9,138,432 (the '432 patent)	September 30, 2025
9,157,121 (the '121 patent)	April 5, 2030

With respect to the '638, '742, '254, '255, '256, '432, and '121 patents,¹ your ANDA contains paragraph IV certifications under section 505(j)(2)(A)(vii)(IV) of the FD&C Act stating that the patents are invalid, unenforceable, or will not be infringed by your manufacture, use, or sale of loperidone Tablets, 1 mg, 2 mg, 4 mg, 6 mg, 8 mg, 10 mg, and 12 mg, under this ANDA. You have notified the Agency that Taro Pharmaceutical Industries Limited complied with the requirements of section 505(j)(2)(B) of the FD&C Act.

With respect to the '610 and '776 patents, the Agency has determined that information on these patents was submitted to the Agency by the new drug application (NDA) holder (a) after the date of the submission of your ANDA, and (b) more than 30 days after the patent was required to be submitted under 21 CFR 314.53. Therefore, under 21 CFR 314.94(a)(12)(vi), no person with an appropriate patent certification at the time of the submission of the patent was required to submit an amended patent certification to address the '610 and '776 patents. You elected not to submit an amended patent certification with respect to these patents.

Under section 506A of the FD&C Act, certain changes in the conditions described in this ANDA require an approved supplemental application before the change may be made.

Please note that if FDA requires a Risk Evaluation and Mitigation Strategy (REMS) for a listed drug, an ANDA citing that listed drug also will be required to have a REMS. See section 505-1(i) of the FD&C Act.

REPORTING REQUIREMENTS

Postmarketing reporting requirements for this ANDA are set forth in 21 CFR 314.80-81 and 314.98 and at section 506I of the FD&C Act. The Agency should be advised of any change in the marketing status of this drug or if this drug will not be available for sale after approval. In particular, under section 506I(b) of the FD&C Act, you are required to notify the Agency in writing within 180 days from the date of this letter if this drug will not be available for sale within 180 days from the date of approval. As part of such written notification, you must include (1) the identity of the drug by established name and proprietary name (if any); (2) the ANDA number; (3) the strength of the drug; (4) the date on which the drug will be available for sale, if known; and (5) the reason for not marketing the drug after approval.

PROMOTIONAL MATERIALS

You may request advisory comments on proposed introductory advertising and promotional labeling materials prior to publication or dissemination. Please note that these submissions are voluntary. To do so, submit, in triplicate, a cover letter requesting advisory comments, the proposed materials in draft or mock-up form with annotated references, and the package insert (PI), Medication Guide, and patient PI (as applicable) to:

OPDP Regulatory Project Manager
Food and Drug Administration
Center for Drug Evaluation and Research
Office of Prescription Drug Promotion
5901-B Ammendale Road
Beltsville, MD 20705

Alternatively, you may submit a request for advisory comments electronically in eCTD format. For more information about submitting promotional materials in eCTD format, see the draft Guidance for Industry (available at: <http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM443702.pdf>).

You must also submit final promotional materials and package insert(s), accompanied by a Form FDA 2253, at the time of initial dissemination or publication [21 CFR 314.81(b)(3)(i)]. Form FDA 2253 is available at <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083570.pdf>. Information and Instructions for completing the form can be found at <http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM375154.pdf>. For more information about submission of promotional materials to the Office of Prescription Drug Promotion (OPDP), see <http://www.fda.gov/AboutFDA/CentersOffices/CDER/ucm090142.htm>.

ANNUAL FACILITY FEES

The Generic Drug User Fee Amendments of 2012 (GDUFA) (Public Law 112-144, Title III) established certain provisions² with respect to self-identification of facilities and payment of annual facility fees. Your ANDA identifies at least one facility that is subject to the self-identification requirement and payment of an annual facility fee. Self-identification must occur by June 1st of each year for the next fiscal year. Facility fees must be paid each year by the date specified in the Federal Register notice announcing facility fee amounts.

All finished dosage forms (FDFs) or active pharmaceutical ingredients (APIs) manufactured in a facility that has not met its obligations to self-identify or to pay fees when they are due will be deemed misbranded. This means that it will be a violation of federal law to ship these products in interstate commerce or to import them into the United States. Such violations can result in prosecution of those responsible, injunctions, or seizures of misbranded products. Products misbranded because of failure to self-identify or pay facility fees are subject to being denied entry into the United States.

CONTENT OF LABELING

As soon as possible, but no later than 14 days from the date of this letter, submit, using the FDA automated drug registration and listing system (eLIST), the content of labeling [21 CFR 314.50(l)] in structured product labeling (SPL) format, as described at <http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm>, that is

identical in content to the approved labeling (including the package insert, and any patient package insert and/or Medication Guide that may be required). Information on submitting SPL files using eLIST may be found in the guidance for industry titled "SPL Standard for Content of Labeling Technical Qs and As" at

<http://www.fda.gov/downloads/DrugsGuidanceComplianceRegulatoryInformation/Guidances/UCM072392.pdf>. The SPL will be accessible via publicly available labeling repositories.

Sincerely yours,

{See appended electronic signature page}

Vincent Sansone, PharmD
Deputy Director
Office of Regulatory Operations
Office of Generic Drugs
Center for Drug Evaluation and Research

-
- ¹ The Agency notes that the '638, '742, '254, '255, '256, '432, and '121 patents were submitted to the Agency after submission of your ANDA. Litigation, if any, with respect to these patents would not create a statutory stay of approval.
- ² Some of these provisions were amended by the Generic Drug User Fee Amendments of 2017 (GDUFA II) (Public Law 115-52, Title III).



Vincent
Sansone

Digitally signed by Vincent Sansone

Date: 7/22/2019 12:42:06PM

GUID: 508da7410002ba5d796f23a69ef57f39

CENTER FOR DRUG EVALUATION AND RESEARCH

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LABELING

HIGHLIGHTS OF PRESCRIBING INFORMATION
These highlights do not include all the information needed to use HOPERIDONE TABLETS safely and effectively. See full prescribing information for HOPERIDONE TABLETS.

HOPERIDONE TABLETS, oral use
Initial US Approval: 2009

WARNING: INCREASED MORTALITY IN ELDERLY PATIENTS WITH DEMENTIA-RELATED PSYCHOSIS
See full prescribing information for complete details.

ADVERSE MAJOR CHANGES

INDICATIONS AND USAGE

ADVERSE REACTIONS

DRUG FORMS AND ADMINISTRATION

DRUG INTERACTIONS

DOSE FORMS AND STRENGTHS

CONTRAINDICATIONS

WARNINGS AND PRECAUTIONS

FULL PRESCRIBING INFORMATION: CONTENTS

WARNING: INCREASED MORTALITY IN ELDERLY PATIENTS WITH DEMENTIA-RELATED PSYCHOSIS

1 INDICATIONS AND USAGE

2 DOSAGE AND ADMINISTRATION

3 DOSAGE FORMS AND STRENGTHS

4 CONTRAINDICATIONS

5 WARNINGS AND PRECAUTIONS

6 ADVERSE REACTIONS

prolong QTc; use caution and consider dose modification when prescribing loperidone tablets with a drug that may increase the risk of QTc prolongation. Monitor serum potassium and magnesium in patients at risk for electrolyte abnormalities. (5.1, 5.2, 5.3, 5.4, 5.5, 5.6, 5.7, 5.8, 5.9, 6.1, 6.2, 6.3, 6.4, 6.5, 6.6, 6.7, 6.8, 6.9, 6.10, 6.11, 6.12, 6.13, 6.14, 6.15, 6.16, 6.17, 6.18, 6.19, 6.20, 6.21, 6.22, 6.23, 6.24, 6.25, 6.26, 6.27, 6.28, 6.29, 6.30, 6.31, 6.32, 6.33, 6.34, 6.35, 6.36, 6.37, 6.38, 6.39, 6.40, 6.41, 6.42, 6.43, 6.44, 6.45, 6.46, 6.47, 6.48, 6.49, 6.50, 6.51, 6.52, 6.53, 6.54, 6.55, 6.56, 6.57, 6.58, 6.59, 6.60, 6.61, 6.62, 6.63, 6.64, 6.65, 6.66, 6.67, 6.68, 6.69, 6.70, 6.71, 6.72, 6.73, 6.74, 6.75, 6.76, 6.77, 6.78, 6.79, 6.80, 6.81, 6.82, 6.83, 6.84, 6.85, 6.86, 6.87, 6.88, 6.89, 6.90, 6.91, 6.92, 6.93, 6.94, 6.95, 6.96, 6.97, 6.98, 6.99, 7.00, 7.01, 7.02, 7.03, 7.04, 7.05, 7.06, 7.07, 7.08, 7.09, 7.10, 7.11, 7.12, 7.13, 7.14, 7.15, 7.16, 7.17, 7.18, 7.19, 7.20, 7.21, 7.22, 7.23, 7.24, 7.25, 7.26, 7.27, 7.28, 7.29, 7.30, 7.31, 7.32, 7.33, 7.34, 7.35, 7.36, 7.37, 7.38, 7.39, 7.40, 7.41, 7.42, 7.43, 7.44, 7.45, 7.46, 7.47, 7.48, 7.49, 7.50, 7.51, 7.52, 7.53, 7.54, 7.55, 7.56, 7.57, 7.58, 7.59, 7.60, 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16.52, 16.53, 16.54, 16.55, 16.56, 16.57, 16.58, 16.59, 16.60, 16.61, 16.62, 16.63, 16.64, 16.65, 16.66, 16.67, 16.68, 16.69, 16.70, 16.71, 16.72, 16.73, 16.74, 16.75, 16.76, 16.77, 16.78, 16.79, 16.80, 16.81, 16.82, 16.83, 16.84, 16.85, 16.86, 16.87, 16.88, 16.89, 16.90, 16.91, 16.92, 16.93, 16.94, 16.95, 16.96, 16.97, 16.98, 16.99, 17.00, 17.01, 17.02, 17.03, 17.04, 17.05, 17.06, 17.07, 17.08, 17.09, 17.10, 17.11, 17.12, 17.13, 17.14, 17.15, 17.16, 17.17, 17.18, 17.19, 17.20, 17.21, 17.22, 17.23, 17.24, 17.25, 17.26, 17.27, 17.28, 17.29, 17.30, 17.31, 17.32, 17.33, 17.34, 17.35, 17.36, 17.37, 17.38, 17.39, 17.40, 17.41, 17.42, 17.43, 17.44, 17.45, 17.46, 17.47, 17.48, 17.49, 17.50, 17.51, 17.52, 17.53, 17.54, 17.55, 17.56, 17.57, 17.58, 17.59, 17.60, 17.61, 17.62, 17.63, 17.64, 17.65, 17.66, 17.67, 17.68, 17.69, 17.70, 17.71, 17.72, 17.73, 17.74, 17.75, 17.76, 17.77, 17.78, 17.79, 17.80, 17.81, 17.82, 17.83, 17.84, 17.85, 17.86, 17.87, 17.88, 17.89, 17.90, 17.91, 17.92, 17.93, 17.94, 17.95, 17.96, 17.97, 17.98, 17.99, 18.00, 18.01, 18.02, 18.03, 18.04, 18.05, 18.06, 18.07, 18.08, 18.09, 18.10, 18.11, 18.12, 18.13, 18.14, 18.15, 18.16, 18.17, 18.18, 18.19, 18.20, 18.21, 18.22, 18.23, 18.24, 18.25, 18.26, 18.27, 18.28, 18.29, 18.30, 18.31, 18.32, 18.33, 18.34, 18.35, 18.36, 18.37, 18.38, 18.39, 18.40, 18.41, 18.42, 18.43, 18.44, 18.45, 18.46, 18.47, 18.48, 18.49, 18.50, 18.51, 18.52, 18.53, 18.54, 18.55, 18.56, 18.57, 18.58, 18.59, 18.60, 18.61, 18.62, 18.63, 18.64, 18.65, 18.66, 18.67, 18.68, 18.69, 18.70, 18.71, 18.72, 18.73, 18.74, 18.75, 18.76, 18.77, 18.78, 18.79, 18.80, 18.81, 18.82, 18.83, 18.84, 18.85, 18.86, 18.87, 18.88, 18.89, 18.90, 18.91, 18.92, 18.93, 18.94, 18.95, 18.96, 18.97, 18.98, 18.99, 19.00, 19.01, 19.02, 19.03, 19.04, 19.05, 19.06, 19.07, 19.08, 19.09, 19.10, 19.11, 19.12, 19.13, 19.14, 19.15, 19.16, 19.17, 19.18, 19.19, 19.20, 19.21, 19.22, 19.23, 19.24, 19.25, 19.26, 19.27, 19.28, 19.29, 19.30, 19.31, 19.32, 19.33, 19.34, 19.35, 19.36, 19.37, 19.38, 19.39, 19.40, 19.41, 19.42, 19.43, 19.44, 19.45, 19.46, 19.47, 19.48, 19.49, 19.50, 19.51, 19.52, 19.53, 19.54, 19.55, 19.56, 19.57, 19.58, 19.59, 19.60, 19.61, 19.62, 19.63, 19.64, 19.65, 19.66, 19.67, 19.68, 19.69, 19.70, 19.71, 19.72, 19.73, 19.74, 19.75, 19.76, 19.77, 19.78, 19.79, 19.80, 19.81, 19.82, 19.83, 19.84, 19.85, 19.86, 19.87, 19.88, 19.89, 19.90, 19.91, 19.92, 19.93, 19.94, 19.95, 19.96, 19.97, 19.98, 19.99, 20.00, 20.01, 20.02, 20.03, 20.04, 20.05, 20.06, 20.07, 20.08, 20.09, 20.10, 20.11, 20.12, 20.13, 20.14, 20.15, 20.16, 20.17, 20.18, 20.19, 20.20, 20.21, 20.22, 20.23, 20.24, 20.25, 20.26, 20.27, 20.28, 20.29, 20.30, 20.31, 20.32, 20.33, 20.34, 20.35, 20.36, 20.37, 20.38, 20.39, 20.40, 20.41, 20.42, 20.43, 20.44, 20.45, 20.46, 20.47, 20.48, 20.49, 20.50, 20.51, 20.52, 20.53, 20.54, 20.55, 20.56, 20.57, 20.58, 20.59, 20.60, 20.61, 20.62, 20.63, 20.64, 20.65, 20.66, 20.67, 20.68, 20.69, 20.70, 20.71, 20.72, 20.73, 20.74, 20.75, 20.76, 20.77, 20.78, 20.79, 20.80, 20.81, 20.82, 20.83, 20.84, 20.85, 20.86, 20.87, 20.88, 20.89, 20.90, 20.91, 20.92, 20.93, 20.94, 20.95, 20.96, 20.97, 20.98, 20.99, 21.00, 21.01, 21.02, 21.03, 21.04, 21.05, 21.06, 21.07, 21.08, 21.09, 21.10, 21.11, 21.12, 21.13, 21.14, 21.15, 21.16, 21.17, 21.18, 21.19, 21.20, 21.21, 21.22, 21.23, 21.24, 21.25, 21.26, 21.27, 21.28, 21.29, 21.30, 21.31, 21.32, 21.33, 21.34, 21.35, 21.36, 21.37, 21.38, 21.39, 21.40, 21.41, 21.42, 21.43, 21.44, 21.45, 21.46, 21.47, 21.48, 21.49, 21.50, 21.51, 21.52, 21.53, 21.54, 21.55, 21.56, 21.57, 21.58, 21.59, 21.60, 21.61, 21.62, 21.63, 21.64, 21.65, 21.66, 21.67, 21.68, 21.69, 21.70, 21.71, 21.72, 21.73, 21.74, 21.75, 21.76, 21.77, 21.78, 21.79, 21.80, 21.81, 21.82, 21.83, 21.84, 21.85, 21.86, 21.87, 21.88, 21.89, 21.90, 21.91, 21.92, 21.93, 21.94, 21.95, 21.96, 21.97, 21.98, 21.99, 22.00, 22.01, 22.02, 22.03, 22.04, 22.05, 22.06, 22.07, 22.08, 22.09, 22.10, 22.11, 22.12, 22.13, 22.14, 22.15, 22.16, 22.17, 22.18, 22.19, 22.20, 22.21, 22.22, 22.23, 22.24, 22.25, 22.26, 22.27, 22.28, 22.29, 22.30, 22.31, 22.32, 22.33, 22.34, 22.35, 22.36, 22.37, 22.38, 22.39, 22.40, 22.41, 22.42, 22.43, 22.44, 22.45, 22.46, 22.47, 22.48, 22.49, 22.50, 22.51, 22.52, 22.53, 22.54, 22.55, 22.56, 22.57, 22.58, 22.59, 22.60, 22.61, 22.62, 22.63,

NDC 51672-4178-4

60 Tablets

Iloperidone Tablets (1 mg)

Keep this and all medications
out of the reach of children.

Rx only

Each tablet contains: 1 mg iloperidone

Usual Dosage: See package insert for
full prescribing information.

Store at 20° to 25°C (68° to 77°F) [see
USP Controlled Room Temperature].

Protect from light and moisture.



Mfd. by: Taro Pharmaceutical Industries Ltd.
Haifa Bay, Israel 2624761

Dist. by: **Taro Pharmaceuticals U.S.A., Inc.**
Hawthorne, NY 10532

TARO is a registered trademark of
Taro Pharmaceuticals U.S.A., Inc.
20671-1115-0

TARO

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TARO

NDC 51672-4179-4

60 Tablets

Iloperidone Tablets **2 mg**

Keep this and all medications
out of the reach of children.

Rx only

Each tablet contains: 2 mg iloperidone
Usual Dosage: See package insert for full
prescribing information.
Store at 20° to 25°C (68° to 77°F) [see USP
Controlled Room Temperature].
Protect from light and moisture.

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20672-1115-0

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TARO

NDC 51672-4180-4

60 Tablets

Iloperidone Tablets **4 mg**

**Keep this and all medications
out of the reach of children.**

Rx only

Each tablet contains: 4 mg iloperidone

Usual Dosage: See package insert for full
prescribing information.

Store at 20° to 25°C (68° to 77°F) [see USP
Controlled Room Temperature].

Protect from light and moisture.

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20673-1115-0



NDC 51672-4181-4

60 Tablets

Iloperidone Tablets **6 mg**

Keep this and all medications
out of the reach of children.

Rx only

Each tablet contains: 6 mg iloperidone

Usual Dosage: See package insert for full
prescribing information.

Store at 20° to 25°C (68° to 77°F) [see USP
Controlled Room Temperature].

Protect from light and moisture.

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20674-1115-0



TARO

NDC 51672-4182-4

60 Tablets

Iloperidone Tablets **8 mg**

Keep this and all medications
out of the reach of children.

Rx only

Each tablet contains: 8 mg iloperidone

Usual Dosage: See package insert for full
prescribing information.

Store at 20° to 25°C (68° to 77°F) [see USP
Controlled Room Temperature].

Protect from light and moisture.

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Hawthorne, NY 10532

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20675-1115-0



TARO

NDC 51672-4183-4

60 Tablets

Iloperidone Tablets **10 mg**

**Keep this and all medications
out of the reach of children.**

Rx only

Each tablet contains: 10 mg iloperidone
Usual Dosage: See package insert for full
prescribing information.
Store at 20° to 25°C (68° to 77°F) [see USP
Controlled Room Temperature].
Protect from light and moisture.

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Dist. by:
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20676 -1115-0



NDC 51672-4184-4

60 Tablets

Iloperidone Tablets **12 mg**

Keep this and all medications
out of the reach of children.

Rx only

Each tablet contains: 12 mg iloperidone
Usual Dosage: See package insert for full
prescribing information.
Store at 20° to 25°C (68° to 77°F) [see USP
Controlled Room Temperature].
Protect from light and moisture.

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Dist. by:
Taro Pharmaceuticals U.S.A., Inc.
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20677 -1115-0



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21 262-0318-0



Iloperidone Tablets TITRATION PACK

51672-4213-7

Iloperidone Tablets

TITRATION PACK

This pack contains:

- Two 1-mg tablets
- Two 2-mg tablets
- Two 4-mg tablets
- Two 6-mg tablets

Store at 20° to 25°C (68° to 77°F)
 (see USP Controlled Room
 Temperature).

Protect from light and moisture.

Keep out of reach of children.

TARO

8 TABLETS

Rx only

HOW TO BEGIN THERAPY WITH ILOPERIDONE TABLETS

Take one tablet by mouth twice daily according to the schedule shown on the panel to the right. Once you have completed this initial course, continue taking iloperidone tablets as directed by your physician.

SPECIAL INSTRUCTIONS FROM YOUR HEALTH CARE PROVIDER

DOSAGE INSTRUCTIONS:

DAY 1	DAY 2	DAY 3	DAY 4
Take one 1-mg tablet in the morning (AM), and one 1-mg tablet in the evening (PM)	Take one 2-mg tablet in the morning (AM), and one 2-mg tablet in the evening (PM)	Take one 4-mg tablet in the morning (AM), and one 4-mg tablet in the evening (PM)	Take one 6-mg tablet in the morning (AM), and one 6-mg tablet in the evening (PM)
 Morning 1 mg	 Morning 2 mg	 Morning 4 mg	 Morning 6 mg
1 mg Evening 	2 mg Evening 	4 mg Evening 	6 mg Evening

(b) (4)

100MM

100MM

CENTER FOR DRUG EVALUATION AND RESEARCH

APPLICATION NUMBER:
ANDA 207098

BIOEQUIVALENCE REVIEW(s)

DIVISION OF BIOEQUIVALENCE REVIEW
TEMPLATE 2 (SIMPLE IMMEDIATE RELEASE PRODUCTS)

ANDA No.	207098		
Drug Product Name	Iloperidone Tablets		
Strength(s)	1 mg, 2 mg, 4 mg, 6 mg, 8 mg, 10 mg and 12 mg		
Applicant Name	Taro Pharmaceutical U.S.A., Inc.		
Applicant Address	3 Skyline Drive Hawthorne, NY 10532		
Contact	Kavita Srivastava		
US agent's Telephone Number	914 345 9001 (b) (6)		
US Agent's Fax Number	914 593 0078		
US Agent's Email Address	Kavita.srivastava@taro.com		
Original Submission Date(s)	06/02/2014		
Submission Date(s) of Amendment(s) Under Review	05/29/2015 Multiple Categories/Subcategories		
Reviewer	Yang Chang, Pharm.D., Ph.D.		
Study Number (s)	PKD_13_459	PKD_13_460	2013-3306
Study Type (s)	Pivotal Fasting	Pivotal Fed	Pilot Fasting
Strength (s)	1 mg	1 mg	1 mg
Clinical Site	Sun Pharmaceutical Industries Ltd	Pharma Medica Research Inc.	
Clinical Site Address	Clinical Pharmacology Unit, Sun Pharmaceutical Industries Ltd. Tandalja, Vadodara – 390 020 (India)	4770 Sheppard Avenue East Toronto, Ontario, Canada M1S 3V6	
Analytical Site	(b) (4)		
Analytical Site Address	(b) (4)		
OSIS Status	<u>Backlog, Year 1 and Year 2 ANDAs</u> <input type="checkbox"/> Pending <input checked="" type="checkbox"/> Complete		<u>Year 3 ANDAs</u> <input type="checkbox"/> To Be Determined by OSIS <input type="checkbox"/> Pending For Cause Inspection
OVERALL REVIEW RESULT	Adequate		
REVISED/NEW DRAFT GUIDANCE INCLUDED	NO		
COMMUNICATION	<input type="checkbox"/> ECD <input type="checkbox"/> IR		

<input checked="" type="checkbox"/> NOT APPLICABLE			
BIOEQUIVALENCE STUDY TRACKING/SUPPORTING DOCUMENT #	STUDY/TEST TYPE	STRENGTH	REVIEW RESULT
#1 and #4	Fasting	1 mg	Adequate
#1 and #4	Fed	1 mg	Adequate
#1 and #4	Waiver	2 mg	Adequate
#1 and #4	Waiver	4 mg	Adequate
#1 and #4	Waiver	6 mg	Adequate
#1 and #4	Waiver	8 mg	Adequate
#1 and #4	Waiver	10 mg	Adequate
#1 and #4	Waiver	12 mg	Adequate

1. EXECUTIVE SUMMARY

This is a review of an amendment dated May 29, 2015.

Based on the original bioequivalence (BE) review, the firm's pivotal fasting and fed studies are adequate. The formulations for the 2 mg, 4 mg, 6 mg, 8 mg, 10 mg, and 12 mg strengths are proportionally similar to the 1 mg strength of the test product which underwent bioequivalence testing. The OSIS inspection status of this application is complete.¹ However, the application was inadequate due to the deficiencies related to the details of the adverse events in the pilot study and inadequate dissolution data submitted in support of waiver requests. The firm was contacted through information request (IR) on April 27, 2015 regarding the above deficiencies.²

The current amendment contains the firm's response to the deficiencies. The Division of Bioequivalence III (DBIII) finds the firm's response **acceptable**. The dissolution data is adequate with respect to supporting waiver requests of the 2 mg, 4 mg, 6 mg, 8 mg, 10 mg and 12 mg strengths of the test product.

As a result, the application is now **adequate**.

¹ GDRP, ANDA-207098-ORIG-1, Bioequivalence Primary Review, Date Uploaded May 3, 2015

² GDRP, ANDA-207098-ORIG-1, Bioequivalence Primary Review, Email_ANDA_207098_2015-05-04_03_23_37.zip

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3. BACKGROUND

In the original submission, Taro Pharmaceutical U.S.A., Inc. submitted in vivo fasting and fed BE studies comparing its Iloperidone Tablets, 1 mg to the corresponding reference product Fanapt® (iloperidone) tablets, 1 mg. Each of the BE studies was designed as a single-dose, two-way crossover study in healthy male subjects. The firm's pivotal fasting and fed BE studies are adequate. However, the application was inadequate due to the deficiencies related to the adverse events' clarification in the pilot study and dissolution data. The firm was contacted through information request (IR) on April 27, 2015 regarding the above deficiencies.

In the current amendment dated May 29, 2015, the firm provided its response to IR.

4. CONTENTS OF SUBMISSION

Study Types	Yes/No?	How many?
Single-dose fasting (Pivotal)	-	-
Single-dose fed	-	-
Steady-state	-	-
Single-dose fasting and fed (Pilot)	-	-
In vitro dissolution	-	-
Waiver requests	-	-
BCS Waivers	-	-
Clinical Endpoints	-	-
Failed Studies	-	-
Amendment	Yes	1

5. REVIEW OF CURRENT AMENDMENT

DBIII Deficiency Comment:

Please provide the details of all adverse events (AEs) reported in the pilot study (2013-3306) including the severity/intensity of the AEs (i.e., mild, moderate, severe, serious etc.).

Firm's Response to deficiency Comment:

Details of all adverse events (AEs) reported in the pilot study (2013-3306) including the severity/intensity of the AEs are provided in Module 5.3.1.2 under study folder 2013-3306 "ae-listing-study -2013-3306.pdf".

Reviewer's Comment on the Firm's Response to Deficiency Comment:

- The firm provided details of all AEs reported in the pilot study including the severity of the AEs. The relation of the AEs to the drugs were probable or

unlikely and the severity of all reported AEs were mild. There is no substantial difference between the test and reference product for adverse event profile. There are no other safety concerns based on the adverse event profile of the pilot study provided by firm.

- The firm's response to this deficiency comment is adequate.

DBIII Deficiency Comment:

Your waiver requests for the 2 mg, 4 mg, 6 mg, 8 mg, 10 mg and 12 mg strengths are not considered at this time due to inadequate dissolution testing data for all strengths of the test and reference products. Your dissolution testing was conducted (b) (4)

Please submit additional dissolution testing data on twelve (12) dosage units of unexpired batches of each test and reference product using the following FDA-recommended method (b) (4) to support the waiver requests of the lower strengths of the test product, as well to establish a regulatory dissolution method and specifications for quality control purposes.

Apparatus	II (paddle)
Speed of Rotation	50 rpm
Medium	0.1N HCl
Volume	500 mL
Recommended Sampling Times	5, 10, 15, 30, 45 and 60 minutes

Firm's Response to deficiency Comment:

Additional dissolution testing was conducted by Taro on twelve (12) dosage units of unexpired batches of each test and reference product using the recommended FDA method (b) (4) to support Taro's waiver requests of the 2 mg, 4 mg, 6 mg, 8 mg, 10 mg and 12 mg strengths of the test product (please see individual dissolution testing data in Appendix).

Reviewer's Comment on the Firm's Response to Deficiency Comment:

- The firm conducted the dissolution testing on twelve (12) dosage units of unexpired batches of each test and reference product using the FDA-recommended method (b) (4)
- Each strength of the test product releases (u) (4) than (b) (4) % of iloperidone within 30 minutes, so the similarity factor (F2) calculation is not applicable.
- The dissolution data is adequate to support the waiver requests of the 2 mg, 4 mg, 6 mg, 8 mg, 10 mg and 12 mg strengths of the test product.
- The firm's response to this deficiency comment is adequate.

DBIII Deficiency Comment:

If necessary, please develop a discriminating and reproducible dissolution method, using conventional USP apparatuses and vessels, for the purpose of comparing dissolution profiles between strengths of the test and reference products in support of your waiver requests of the lower strengths.

Firm's Response to deficiency Comment:

Since Taro will adopt the FDA-recommended method (with conventional USP dissolution vessels) for dissolution testing of its drug product Iloperidone Tablets, 1 mg, 2 mg, 4 mg, 6 mg, 8 mg, 10 mg and 12 mg, it is not necessary to develop a discriminating method at this time (b) (4) is enclosed in Module 3.2.P.5.2.

Reviewer's Comment on the Firm's Response to Deficiency Comment:

- The firm conducted acceptable dissolution testing using the FDA-recommended method. The dissolution data is adequate to support the waiver requests of the 2 mg, 4 mg, 6 mg, 8 mg, 10 mg and 12 mg strengths of the test product.
- The firm's response to this deficiency comment is adequate.

6. APPENDIX

Comment 1 in the IR letter (Dissolution Comment):

Your dissolution testing is not acceptable. (b) (4)

Please conduct dissolution testing on twelve (12) dosage units of unexpired batches of each test and reference product using the following FDA-recommended method:

USP Apparatus	II (paddle)
Rotation speed	50 rpm
Medium	0.1N HCl
Volume	500 mL
Temperature	37 ± 0.5 °C
Sampling Times	5, 10, 15, 30, 45 and 60 minutes

Firm's response to comment No.1 (dissolution deficiency comment)

As per the Division of Bioequivalence request, Taro had conducted comparative dissolution testing of its Iloperidone Tablets vs. the Reference Listed Drug (RLD) Fanapt® (Iloperidone) Tablets for all product strengths (1mg, 2mg, 4mg, 6mg, 8mg, 10mg, and 12mg). The dissolution testing was conducted according to the FDA recommended dissolution method as detailed above, (b) (4)

Based on these dissolution results, Taro acknowledges the Agency's recommendation to use the FDA recommended method (Apparatus II (paddle); 50rpm, 0.1N HCl, 500 mL) (b) (4) for testing dissolution at release and stability of its Iloperidone Tablets 1 mg, 2 mg, 4 mg, 6 mg, 8 mg, 10 mg and 12 mg. (b) (4)

The updated dissolution method is enclosed in Module 3.2.P.5.2.

(b) (4)

Therefore, based on the data generated, Taro is proposing acceptance criteria of NLT

(b)
(4) % (Q) in 30 minutes for the dissolution of its Iloperidone Tablets. The proposed specifications are enclosed in Module 3.2.P.5.1 and 3.2.P.8.1.

Dissolution data

(b) (4)

Table 5.3.1: Bioequivalence Summary – **Iloperidone Tablets, 1 mg (Bio Batch)**

Dissolution Conditions		Apparatus:		USP 2 (paddles)							
		Speed of Rotation:		50 rpm							
		Medium:		0.1N HCl							
		Volume:		500 mL							
		Temperature:		37.0°C ± 0.5°C							
Firm's Proposed Specifications		NLT ^(b) ₍₄₎ % (Q) of the labeled amount is dissolved in 30 min									
Dissolution Testing Site (Name, Address)		Taro Pharmaceutical Industries Ltd. 14 Hakitor Street Haifa Bay 2624761, Israel									
Product ID\Batch No. (Test - Manufacture Date) (Reference – Expiration Date)	Testing Date	Dosage Strength & Form	No. of Dosage Units		Collection Times (minutes)						Study Report Location
					5	10	15	30	45	60	
Test Product – 781984 Bio batch (Mfg date – July, 2013)	May 20, 2015	1 mg Tablet	12	Mean	86	89	91	95	96	97	Batch Analysis Section 3.2.P.5.4
				Range	(b) (4)						
				%CV	6.38	4.17	3.76	3.13	2.85	2.66	
Reference Product – KKSZ (Exp date – October, 2015)	May 20, 2015	1 mg Tablet	12	Mean	97	101	101	100	101	100	(b) (4)
				Range	(b) (4)						
				%CV	5.01	1.98	1.84	2.02	1.81	2.33	

Table 5.3.2: Bioequivalence Summary – **Iloperidone Tablets, 1 mg**

Dissolution Conditions		Apparatus:		USP 2 (paddles)							
		Speed of Rotation:		50 rpm							
		Medium:		0.1N HCl							
		Volume:		500 mL							
		Temperature:		37.0°C ± 0.5°C							
Firm's Proposed Specifications		NLT ^(b) ₍₄₎ % (Q) of the labeled amount is dissolved in 30 min									
Dissolution Testing Site (Name, Address)		Taro Pharmaceutical Industries Ltd. 14 Hakitor Street Haifa Bay 2624761, Israel									
Product ID\Batch No. (Test - Manufacture Date) (Reference – Expiration Date)	Testing Date	Dosage Strength & Form	No. of Dosage Units		Collection Times (minutes)						Study Report Location
					5	10	15	30	45	60	
Test Product – 782084 (Mfg date – December, 2013)	May 20, 2015	1 mg Tablet	12	Mean	84	88	90	95	97	98	Batch Analysis Section 3.2.P.5.4
				Range	(b) (4)						
				%CV	10.20	8.36	6.85	4.11	3.02	2.47	
Reference Product – KKSZ (Exp date – October, 2015)	May 20, 2015	1 mg Tablet	12	Mean	97	101	101	100	101	100	(b) (4)
				Range	(b) (4)						
				%CV	5.01	1.98	1.84	2.02	1.81	2.33	

Table 5.3.3: Bioequivalence Summary – **Iloperidone Tablets, 2 mg**

Dissolution Conditions				Apparatus:		USP 2 (paddles)					
				Speed of Rotation:		50 rpm					
				Medium:		0.1N HCl					
				Volume:		500 mL					
				Temperature:		37.0°C ± 0.5°C					
Firm's Proposed Specifications				NLT ^(b) ₍₄₎ % (Q) of the labeled amount is dissolved in 30 min							
Dissolution Testing Site (Name, Address)				Taro Pharmaceutical Industries Ltd. 14 Hakitor Street Haifa Bay 2624761, Israel							
Product ID\Batch No. (Test - Manufacture Date) (Reference – Expiration Date)	Testing Date	Dosage Strength & Form	No. of Dosage Units		Collection Times (minutes)						Study Report Location
					5	10	15	30	45	60	
Test Product – 782085 (Mfg date – December, 2013)	May 20, 2015	2 mg Tablet	12	Mean	84	89	91	96	99	100	^(b) ₍₄₎
				Range							
				%CV	7.45	6.36	5.64	3.94	2.82	2.20	
Reference Product – KZDD (Exp date – October, 2015)	May 20, 2015	2 mg Tablet	12	Mean	97	99	99	100	100	100	^(b) ₍₄₎
				Range							
				%CV	3.11	1.43	1.21	0.85	0.76	0.79	

Batch Analysis Section 3.2.P.5.4

Table 5.3.4: Bioequivalence Summary – **Iloperidone Tablets, 4 mg**

Dissolution Conditions		Apparatus:		USP 2 (paddles)							
		Speed of Rotation:		50 rpm							
		Medium:		0.1N HCl							
		Volume:		500 mL							
		Temperature:		37.0°C ± 0.5°C							
Firm's Proposed Specifications		NLT ^(b) ₍₄₎ % (Q) of the labeled amount is dissolved in 30 min									
Dissolution Testing Site (Name, Address)		Taro Pharmaceutical Industries Ltd. 14 Hakitor Street Haifa Bay 2624761, Israel									
Product ID \ Batch No. (Test - Manufacture Date) (Reference – Expiration Date)	Testing Date	Dosage Strength & Form	No. of Dosage Units		Collection Times (minutes)						Study Report Location
					5	10	15	30	45	60	
Test Product – 782086 (Mfg date – December, 2013)	May 20, 2015	4 mg Tablet	12	Mean	82	86	89	94	97	98	Batch Analysis Section 3.2.P.5.4
				Range	(b) (4)						
				%CV	8.21	6.25	5.18	3.60	2.75	2.45	
Reference Product – KWDX (Exp date – January, 2016)	May 20, 2015	4 mg Tablet	12	Mean	73	83	87	96	99	100	Batch Analysis Section 3.2.P.5.4
				Range	(b) (4)						
				%CV	12.21	9.55	7.58	3.26	1.43	1.49	

Table 5.3.5: Bioequivalence Summary – **Iloperidone Tablets, 6 mg**

Dissolution Conditions		Apparatus:		USP 2 (paddles)							
		Speed of Rotation:		50 rpm							
		Medium:		0.1N HCl							
		Volume:		500 mL							
		Temperature:		37.0°C ± 0.5°C							
Firm's Proposed Specifications		NLT ^(b) ₍₄₎ % (Q) of the labeled amount is dissolved in 30 min									
Dissolution Testing Site (Name, Address)		Taro Pharmaceutical Industries Ltd. 14 Hakitor Street Haifa Bay 2624761, Israel									
Product ID \ Batch No. (Test - Manufacture Date) (Reference – Expiration Date)	Testing Date	Dosage Strength & Form	No. of Dosage Units		Collection Times (minutes)						Study Report Location
					5	10	15	30	45	60	
Test Product – 782087 (Mfg date – December, 2013)	May 20, 2015	6 mg Tablet	12	Mean	77	81	83	88	92	94	Batch Analysis Section 3.2.P.5.4
				Range	(b) (4)						
				%CV	5.61	4.86	4.79	4.36	3.96	3.62	
Reference Product – KKTB (Exp date – September, 2015)	May 20, 2015	6 mg Tablet	12	Mean	74	87	93	98	99	100	(b) (4)
				Range	(b) (4)						
				%CV	10.91	6.50	4.03	1.88	1.46	1.32	

Table 5.3.6: Bioequivalence Summary – **Iloperidone Tablets, 8 mg**

Dissolution Conditions		Apparatus:		USP 2 (paddles)							
		Speed of Rotation:		50 rpm							
		Medium:		0.1N HCl							
		Volume:		500 mL							
		Temperature:		37.0°C ± 0.5°C							
Firm's Proposed Specifications		NLT ^(b) ₍₄₎ % (Q) of the labeled amount is dissolved in 30 min									
Dissolution Testing Site (Name, Address)		Taro Pharmaceutical Industries Ltd. 14 Hakitor Street Haifa Bay 2624761, Israel									
Product ID \ Batch No. (Test - Manufacture Date) (Reference – Expiration Date)	Testing Date	Dosage Strength & Form	No. of Dosage Units		Collection Times (minutes)						Study Report Location
					5	10	15	30	45	60	
Test Product – 782088 (Mfg date – December, 2013)	May 20, 2015	8 mg Tablet	12	Mean	80	85	88	94	97	99	Batch Analysis Section 3.2.P.5.4
				Range	(b) (4)						
				%CV	9.22	6.84	5.43	3.55	2.91	2.81	
Reference Product – KZDK (Exp date – October, 2015)	May 20, 2015	8 mg Tablet	12	Mean	81	86	90	95	98	99	Batch Analysis Section 3.2.P.5.4
				Range	(b) (4)						
				%CV	11.23	8.17	6.32	4.16	3.21	2.73	

Table 5.3.7: Bioequivalence Summary – **Iloperidone Tablets, 10 mg**

Dissolution Conditions				Apparatus:		USP 2 (paddles)					
				Speed of Rotation:		50 rpm					
				Medium:		0.1N HCl					
				Volume:		500 mL					
				Temperature:		37.0°C ± 0.5°C					
Firm's Proposed Specifications				NLT ^(b) ₍₄₎ % (Q) of the labeled amount is dissolved in 30 min							
Dissolution Testing Site (Name, Address)				Taro Pharmaceutical Industries Ltd. 14 Hakitor Street Haifa Bay 2624761, Israel							
Product ID \ Batch No. (Test - Manufacture Date) (Reference – Expiration Date)	Testing Date	Dosage Strength & Form	No. of Dosage Units		Collection Times (minutes)						Study Report Location
					5	10	15	30	45	60	
Test Product – 782089 (Mfg date – December, 2013)	May 20, 2015	10 mg Tablet	12	Mean	81	84	87	93	96	99	Batch Analysis Section 3.2.P.5.4
				Range	(b) (4)						
				%CV	6.75	6.40	5.45	3.68	2.96	2.55	
Reference Product – MGSC (Exp date – November, 2015)	May 20, 2015	10 mg Tablet	12	Mean	77	83	87	94	97	98	Batch Analysis Section 3.2.P.5.4
				Range	(b) (4)						
				%CV	12.13	8.47	5.68	3.23	2.94	2.80	

Table 5.3.8: Bioequivalence Summary – **Iloperidone Tablets, 12 mg**

Product ID \ Batch No. (Test - Manufacture Date) (Reference – Expiration Date)		Testing Date	Dosage Strength & Form	No. of Dosage Units		Collection Times (minutes)						Study Report Location
						5	10	15	30	45	60	
Dissolution Conditions		Apparatus:		USP 2 (paddles)								
		Speed of Rotation:		50 rpm								
		Medium:		0.1N HCl								
		Volume:		500 mL								
		Temperature:		37.0°C ± 0.5°C								
Firm's Proposed Specifications		NLT ^(b) ₍₄₎ % (Q) of the labeled amount is dissolved in 30 min										
Dissolution Testing Site (Name, Address)		Taro Pharmaceutical Industries Ltd. 14 Hakitor Street Haifa Bay 2624761, Israel										
Test Product – 782090 (Mfg date – December, 2013)		May 20, 2015	12 mg Tablet	12	Mean	81	83	85	90	92	94	Batch Analysis Section 3.2.P.5.4
					Range	(b) (4)						
					%CV	6.57	6.08	5.11	3.63	3.47	3.74	
Reference Product – MDGD (Exp date – December, 2015)		May 20, 2015	12 mg Tablet	12	Mean	71	80	86	95	98	99	
					Range	(b) (4)						
					%CV	17.40	11.84	8.36	3.68	2.06	1.51	

BIOEQUIVALENCE COMMENTS TO BE PROVIDED TO THE APPLICANT

ANDA: 207098
APPLICANT: Taro Pharmaceutical U.S.A., Inc.
DRUG PRODUCT: Iloperidone Tablets
1 mg, 2 mg, 4 mg, 6 mg, 8 mg, 10 mg, and 12 mg

The Division of Bioequivalence III (DBIII) has completed its review and has no further questions at this time.

The bioequivalence comments provided in this communication are comprehensive as of issuance. However, these comments are subject to revision if additional concerns raised by chemistry, manufacturing and controls, microbiology, labeling, other scientific or regulatory issues or inspectional results arise in the future. Please be advised that these concerns may result in the need for additional bioequivalence information and/or studies, or may result in a conclusion that the proposed formulation is not approvable.

Sincerely yours,

{See appended electronic signature page}

Hoainhon Nguyen Caramenico, M.S., M.S.
Acting Director, Division of Bioequivalence III
Office of Bioequivalence
Office of Generic Drugs
Center for Drug Evaluation and Research

7. OUTCOME PAGE

ANDA: 207098

Reviewer: Chang, Yang

Date Completed:

Verifier: ,

Date Verified:

Division: Division of Bioequivalence

Description:

Productivity:

<i>ID</i>	<i>Letter Date</i>	<i>Productivity Category</i>	<i>Sub Category</i>	<i>Productivity</i>	<i>Subtotal</i>
26162	5/29/2015	Other (REGULAR)	Study Amendment	1	1
26162	5/29/2015	Quality Assessment	Quality	5	5
				Total:	6

DIVISION OF BIOEQUIVALENCE DISSOLUTION REVIEW

ANDA No.	207098
Drug Product Name	Iloperidone Tablets
Strength (s)	1 mg, 2 mg, 4 mg, 6 mg, 8 mg, 10 mg, 12 mg
Applicant Name	Taro Pharmaceutical Industries Ltd.
Applicant Address	14 Hakitor Street, Haifa Bay, Israel, 2624761
US Agent Name and the mailing address	Taro Pharmaceuticals U.S.A. Inc. (Kavita Srivastava, Executive Director, Regulatory Affairs), 3 Skyline Drive, Hawthorne, NY 10532
US Agent's Telephone Number	914-345-9001 (b) (6)
US Agent's Fax Number	914-593-0078
Original Submission Date(s)	06/02/2014
Submission Date(s) of Amendment(s) Under Review	05/29/2015
Reviewer	Sam Chan
Dissolution Method	ADEQUATE
OVERALL REVIEW RESULT	ADEQUATE

I. EXECUTIVE SUMMARY

This is a review of the dissolution amendment.

There is no USP method but there is an FDA-recommended method for this product. In the original dissolution review¹, the firm's dissolution testing using the FDA-recommended method [500 mL of 0.1N HCl @ 37 ± 0.5°C, USP apparatus II at 50 rpm] (b) (4) In the DBII deficiency letter dated 04/27/2015, the firm was asked to provide dissolution data using the FDA-recommended.

In its current amendment dated May 29, 2015 the firm provided acceptable dissolution data using the FDA-recommended method (b) (4) The firm's proposed specification of NLT (b) (4)% (Q) in 30 minutes is also acceptable. The DB II acknowledges that the firm will follow the FDA-recommended method and its proposed specification.

As a result, the dissolution testing conducted is **adequate**.

¹ GDRP: ANDA 207098 under Biopharmaceutics Primary Review uploaded on 1/13/2015.

II. DISSOLUTION REVIEW

II.1 Submission Content Checklist

Information	YES	NO	N/A
Is there a posted dissolution method on the FDA website?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Did the firm use the above method?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is there a USP dissolution method?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Did the firm use the USP dissolution method?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Did the firm use 12 units of both test and reference in dissolution testing?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Did the firm provide complete dissolution data (all raw data, range, mean, % CV, dates of dissolution testing)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Did the firm conduct dissolution testing with its own proposed method?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Did the firm submit dissolution method validation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

II.2 Dissolution Method As Posted on the FDA Website (if any)

Drug Name	Dosage Form	USP Apparatus	Speed (RPMs)	Medium	Volume (mL)	Recommended Sampling Times (minutes)	Date Updated
Iloperidone	Tablet	II (Paddle)	50	0.1 N HCl	500	5, 10, 15, 30, 45 and 60	08/05/2010

II.3 USP Method (if any)

II.4 Summary of In Vitro Dissolution Data

The firm provided dissolution data for all strengths of test and reference using FDA-recommended method in its current amendment dated 5/29/2015.

Dissolution Data 1mg:

Product ID\Batch No. (Test - Manufacture Date) (Reference – Expiration Date)		Testing Date	Dosage Strength & Form	No. of Dosage Units		Collection Times (minutes)						Study Report Location
						5	10	15	30	45	60	
Dissolution Conditions		Apparatus:		USP 2 (paddles)								
		Speed of Rotation:		50 rpm								
		Medium:		0.1N HCl								
		Volume:		500 mL								
		Temperature:		37.0°C ± 0.5°C								
Firm's Proposed Specifications		NLT ^(b) ₍₄₎ % (Q) of the labeled amount is dissolved in 30 min										
Dissolution Testing Site (Name, Address)		Taro Pharmaceutical Industries Ltd. 14 Hakitor Street Haifa Bay 2624761, Israel										
Test Product – 781984 Bio batch (Mfg date – July, 2013)		May 20, 2015	1 mg Tablet	12	Mean	86	89	91	95	96	97	Batch Analysis Section 3.2.P.5.4
				Range	(b) (4)							
				%CV	6.38	4.17	3.76	3.13	2.85	2.66		
Reference Product – KKSZ (Exp date – October, 2015)		May 20, 2015	1 mg Tablet	12	Mean	97	101	101	100	101	100	(b) (4)
				Range	(b) (4)							
				%CV	5.01	1.98	1.84	2.02	1.81	2.33		

Dissolution Data 1 mg:

Dissolution Conditions				Apparatus:	USP 2 (paddles)						
				Speed of Rotation:	50 rpm						
				Medium:	0.1N HCl						
				Volume:	500 mL						
				Temperature:	37.0°C ± 0.5°C						
Firm's Proposed Specifications				NLT ^(b) ₍₄₎ % (Q) of the labeled amount is dissolved in 30 min							
Dissolution Testing Site (Name, Address)				Taro Pharmaceutical Industries Ltd. 14 Hakitor Street Haifa Bay 2624761, Israel							
Product ID\Batch No. (Test - Manufacture Date) (Reference - Expiration Date)	Testing Date	Dosage Strength & Form	No. of Dosage Units		Collection Times (minutes)						Study Report Location
					5	10	15	30	45	60	
Test Product – 782084 (Mfg date – December, 2013)	May 20, 2015	1 mg Tablet	12	Mean	84	88	90	95	97	98	Batch Analysis Section 3.2.P.5.4
				Range	(b) (4)						
				%CV	10.20	8.36	6.85	4.11	3.02	2.47	
Reference Product – KKSZ (Exp date – October, 2015)	May 20, 2015	1 mg Tablet	12	Mean	97	101	101	100	101	100	(b) (4)
				Range	(b) (4)						
				%CV	5.01	1.98	1.84	2.02	1.81	2.33	

Dissolution Data 2 mg:

Dissolution Conditions				Apparatus:		USP 2 (paddles)					
				Speed of Rotation:		50 rpm					
				Medium:		0.1N HCl					
				Volume:		500 mL					
				Temperature:		37.0°C ± 0.5°C					
Firm's Proposed Specifications				NLT ^(b) ₍₄₎ % (Q) of the labeled amount is dissolved in 30 min							
Dissolution Testing Site (Name, Address)				Taro Pharmaceutical Industries Ltd. 14 Hakitor Street Haifa Bay 2624761, Israel							
Product ID\Batch No. (Test - Manufacture Date) (Reference - Expiration Date)	Testing Date	Dosage Strength & Form	No. of Dosage Units		Collection Times (minutes)						Study Report Location
					5	10	15	30	45	60	
Test Product – 782085 (Mfg date – December, 2013)	May 20, 2015	2 mg Tablet	12	Mean	84	89	91	96	99	100	Batch Analysis Section 3.2.P.5.4
				Range	(b) (4)						
				%CV	7.45	6.36	5.64	3.94	2.82	2.20	
Reference Product – KZDD (Exp date – October, 2015)	May 20, 2015	2 mg Tablet	12	Mean	97	99	99	100	100	100	(b) (4)
				Range	(b) (4)						
				%CV	3.11	1.43	1.21	0.85	0.76	0.79	

Dissolution Data 4 mg:

Dissolution Conditions		Apparatus:		USP 2 (paddles)							
		Speed of Rotation:		50 rpm							
		Medium:		0.1N HCl							
		Volume:		500 mL							
		Temperature:		37.0°C ± 0.5°C							
Firm's Proposed Specifications		NLT ^(b) ₍₄₎ % (Q) of the labeled amount is dissolved in 30 min									
Dissolution Testing Site (Name, Address)		Taro Pharmaceutical Industries Ltd. 14 Hakitor Street Haifa Bay 2624761, Israel									
Product ID \ Batch No. (Test - Manufacture Date) (Reference – Expiration Date)	Testing Date	Dosage Strength & Form	No. of Dosage Units		Collection Times (minutes)						Study Report Location
					5	10	15	30	45	60	
Test Product – 782086 (Mfg date – December, 2013)	May 20, 2015	4 mg Tablet	12	Mean	82	86	89	94	97	98	(b) (4) Batch Analysis Section 3.2.P.5.4
				Range	(b) (4)						
				%CV	8.21	6.25	5.18	3.60	2.75	2.45	
Reference Product – KWDX (Exp date – January, 2016)	May 20, 2015	4 mg Tablet	12	Mean	73	83	87	96	99	100	(b) (4) Batch Analysis Section 3.2.P.5.4
				Range	(b) (4)						
				%CV	12.21	9.55	7.58	3.26	1.43	1.49	

Dissolution Data 6 mg:

Dissolution Conditions		Apparatus:		USP 2 (paddles)							
		Speed of Rotation:		50 rpm							
		Medium:		0.1N HCl							
		Volume:		500 mL							
		Temperature:		37.0°C ± 0.5°C							
Firm's Proposed Specifications		NLT ^(b) ₍₄₎ % (Q) of the labeled amount is dissolved in 30 min									
Dissolution Testing Site (Name, Address)		Taro Pharmaceutical Industries Ltd. 14 Hakitor Street Haifa Bay 2624761, Israel									
Product ID \ Batch No. (Test - Manufacture Date) (Reference - Expiration Date)	Testing Date	Dosage Strength & Form	No. of Dosage Units		Collection Times (minutes)						Study Report Location
					5	10	15	30	45	60	
Test Product – 782087 (Mfg date – December, 2013)	May 20, 2015	6 mg Tablet	12	Mean	77	81	83	88	92	94	^(b) ₍₄₎ Batch Analysis Section 3.2.P.5.4
				Range	[REDACTED]						
				%CV	5.61	4.86	4.79	4.36	3.96	3.62	
Reference Product – KKTB (Exp date – September, 2015)	May 20, 2015	6 mg Tablet	12	Mean	74	87	93	98	99	100	^(b) ₍₄₎
				Range	[REDACTED]						
				%CV	10.91	6.50	4.03	1.88	1.46	1.32	

Dissolution Data 8 mg:

Dissolution Conditions				Apparatus:	USP 2 (paddles)						
				Speed of Rotation:	50 rpm						
				Medium:	0.1N HCl						
				Volume:	500 mL						
				Temperature:	37.0°C ± 0.5°C						
Firm's Proposed Specifications				NLT ^(b) ₍₄₎ % (Q) of the labeled amount is dissolved in 30 min							
Dissolution Testing Site (Name, Address)				Taro Pharmaceutical Industries Ltd. 14 Hakitor Street Haifa Bay 2624761, Israel							
Product ID \ Batch No. (Test - Manufacture Date) (Reference – Expiration Date)	Testing Date	Dosage Strength & Form	No. of Dosage Units		Collection Times (minutes)						Study Report Location
					5	10	15	30	45	60	
Test Product – 782088 (Mfg date – December, 2013)	May 20, 2015	8 mg Tablet	12	Mean	80	85	88	94	97	99	Batch Analysis Section 3.2.P.5.4
				Range	(b) (4)						
				%CV	9.22	6.84	5.43	3.55	2.91	2.81	
Reference Product – KZDK (Exp date – October, 2015)	May 20, 2015	8 mg Tablet	12	Mean	81	86	90	95	98	99	(b) (4)
				Range	(b) (4)						
				%CV	11.23	8.17	6.32	4.16	3.21	2.73	

Dissolution Data 10 mg:

Dissolution Conditions		Apparatus:		USP 2 (paddles)							
		Speed of Rotation:		50 rpm							
		Medium:		0.1N HCl							
		Volume:		500 mL							
		Temperature:		37.0°C ± 0.5°C							
Firm's Proposed Specifications		NLT ^(b) ₍₄₎ % (Q) of the labeled amount is dissolved in 30 min									
Dissolution Testing Site (Name, Address)		Taro Pharmaceutical Industries Ltd. 14 Hakitor Street Haifa Bay 2624761, Israel									
Product ID \ Batch No. (Test - Manufacture Date) (Reference – Expiration Date)	Testing Date	Dosage Strength & Form	No. of Dosage Units		Collection Times (minutes)						Study Report Location
					5	10	15	30	45	60	
Test Product – 782089 (Mfg date – December, 2013)	May 20, 2015	10 mg Tablet	12	Mean	81	84	87	93	96	99	(b) (4) Batch Analysis Section 3.2.P.5.4
				Range	(b) (4)						
				%CV	6.75	6.40	5.45	3.68	2.96	2.55	
Reference Product – MGSC (Exp date – November, 2015)	May 20, 2015	10 mg Tablet	12	Mean	77	83	87	94	97	98	(b) (4) Batch Analysis Section 3.2.P.5.4
				Range	(b) (4)						
				%CV	12.13	8.47	5.68	3.23	2.94	2.80	

Dissolution Data 12 mg:

Dissolution Conditions		Apparatus:		USP 2 (paddles)							
		Speed of Rotation:		50 rpm							
		Medium:		0.1N HCl							
		Volume:		500 mL							
		Temperature:		37.0°C ± 0.5°C							
Firm's Proposed Specifications		NLT ^(b) ₍₄₎ % (Q) of the labeled amount is dissolved in 30 min									
Dissolution Testing Site (Name, Address)		Taro Pharmaceutical Industries Ltd. 14 Hakitor Street Haifa Bay 2624761, Israel									
Product ID \ Batch No. (Test - Manufacture Date) (Reference – Expiration Date)	Testing Date	Dosage Strength & Form	No. of Dosage Units		Collection Times (minutes)						Study Report Location
					5	10	15	30	45	60	
Test Product – 782090 (Mfg date – December, 2013)	May 20, 2015	12 mg Tablet	12	Mean	81	83	85	90	92	94	Batch Analysis Section 3.2.P.5.4
				Range	(b) (4)						
				%CV	6.57	6.08	5.11	3.63	3.47	3.74	
Reference Product – MDGD (Exp date – December, 2015)	May 20, 2015	12 mg Tablet	12	Mean	71	80	86	95	98	99	(b) (4)
				Range	(b) (4)						
				%CV	17.40	11.84	8.36	3.68	2.06	1.51	

Dissolution Method SOP effective at the time of testing (Yes/No)	No (May 28, 2015)
Were the drug product units pooled during the dissolution testing (Yes/No)?	No
Was the dissolution testing conducted on the bio-batch?	Yes
Age of the test product at the time of dissolution testing.	22 months for the bio-batch, 17 months for the rest.
Was the reference product expired at the time of dissolution testing (Yes/No)	No
Comments on the variability of the dissolution data	The variability of the data is adequate
For two-stage dissolution testing, comment on the method of medium change from acid stage to buffer stage.	N/A

III. REVIEW OF THE CURRENT SUBMISSION:

The firm's response to the three dissolution deficiencies and the reviewer's evaluation of this responses are provided in this section of the review.

Dissolution Deficiency #1:

Your dissolution testing is not acceptable. The Division of Bioequivalence does not encourage [REDACTED] (b) (4) in conducting dissolution testing. Please conduct dissolution testing on twelve (12) dosage units of unexpired batches of each test and reference product using the following FDA-recommended method:

USP Apparatus	II (paddle)
Rotation speed	50 rpm
Medium	0.1 N HCl
Volume	500 ml
Temperature	37.0 ± 0.5°C
Sampling Times	5, 10, 15, 30, 45 and 60 minutes

Firm's Response:

As per the Division of Bioequivalence request, Taro had conducted comparative dissolution testing of its Iloperidone Tablets vs. the Reference Listed Drug (RLD) Fanapt® (Iloperidone) Tablets for all product strengths (1mg, 2mg, 4mg, 6mg, 8mg, 10mg, and 12mg). The dissolution testing was conducted according to the FDA-recommended dissolution method as detailed above, [REDACTED] (b) (4)

The comparative dissolution results show that Taro's Iloperidone Tablets is comparable to the reference product by means of dissolution with f2 values of >50%.

Based on these dissolution results, Taro acknowledges the Agency's recommendation to use the FDA recommended method (Apparatus II(paddle); 50rpm, 0.1N HCl, 500mL) [REDACTED] (b) (4) for testing dissolution at release and stability of its Iloperidone Tablets 1 mg, 2 mg, 4 mg, 6 mg, 8 mg, 10 mg and 12 mg. [REDACTED] (b) (4)

[REDACTED] (b) (4)

Therefore, based on the data generated, Taro is proposing acceptance criteria of NLT [REDACTED] (b) (4) % (Q) for the dissolution of its Iloperidone Tablets. The proposed specifications are enclosed in Module 3.2.P.5.1 and 3.2.P.8.1.

Reviewer's Comments:

- In its initial submission, the firm's dissolution testing data using the modified FDA-recommended method [500 mL of 0.1N HCl @ $37 \pm 0.5^\circ\text{C}$, USP apparatus II at 50 rpm] (b)(4) for its test products Iloperidone Tablets, 1 mg (lot# 781984-bio-batch), 1 mg (lot# 782084), 2 mg (lot# 782085), 4 mg (lot# 782086), 6 mg (lot# 782087), 8 mg (lot# 782088), 10 mg (lot# 782089) and 20 mg (lot# 782090).
- In its current amendment dated 05/29/2015, the firm acknowledged the DBII recommended method [500 mL of 0.1N HCl @ $37 \pm 0.5^\circ\text{C}$, USP apparatus II at 50 rpm]. The firm provided acceptable new dissolution data using the FDA-recommended and proposed specification of NLT (b)(4)% (Q) in 30 minutes. The DBII agrees the firm's proposed specification of NLT (b)(4)% in 30 minutes.

Firm's response is satisfactory.

Dissolution Deficiency #2:

The Bioequivalence (BE) Summary Table 5 for 2 mg, 4 mg, 6 mg, 8 mg, 10 mg, and 12 mg strengths, for the dissolution data could not be located in the submission. Please submit Bioequivalence (BE) Summary Table 5, for the dissolution data of all the strengths.

Firm's Response:

The Bioequivalence (BE) Summary Table 5 for 1mg, 2 mg, 4 mg, 6 mg, 8 mg, 10 mg, and 12 mg strengths, for the dissolution data is enclosed in Module 3.2.P.5.4. In addition the dissolution Table 5 was updated to include new dissolution data using FDA recommended method and provided in Module 2.7.1.

Reviewer's Comments:

The firm provided new dissolution summary data in Table 5 in Module 2.7.1. and individual tablet data in Module 3.2P.5.4

Firm's response is satisfactory.

Dissolution Deficiency #3:

The dissolution method was not in effect at the time of dissolution testing. You reported using the Analytical Method (Taro Research Institute (b)(4) effective date: May 19, 2014) for conducting dissolution testing. All the reported dissolution testing was conducted prior to the effective date: May 19, 2014. For future submissions, please submit dissolution data using an effective method.

Firm's Response:

Originally the batches were tested as per edition no. 04 of the dissolution method, which was effective at the time of exhibit batches release (December 2013). Later on, the dissolution method was updated to edition 05 (Effective May 19, 2014) to include a note regarding the stability of standard and sample solutions (b) (4)

Future batches will be tested according to the current edition of method used at Taro at the time of testing.

Reviewer's Comments:

The initial concern regarding the effective date of the dissolution method is resolved.

The current SOP was not effective (b) (4) when the new dissolution testing using the FDA-recommended method was done (b) (4). Since there is only 8 days apart, and the current SOP (b) (4) is the same as the previous (b) (4) it is deemed acceptable. In future submissions, the firm should be informed that the dissolution SOP should be effective prior to the comparative dissolution testing.

IV. Deficiency Comment for Dissolution Testing

None.

V. Dissolution Recommendations

The in vitro dissolution testing conducted by Taro Pharmaceutical Industries Ltd. on its test product, Iloperidone Tablets, 1 mg (lot# 781984 – bio-batch), 1 mg (lot# 782084), 2 mg (lot# 782085), 4 mg (lot# 782086), 6 mg (lot# 782087), 8 mg (lot# 782088), 10 mg (lot# 782089) and 20 mg (lot# 782090), comparing it to (b) (4) Fanapt® (iloperidone) tablets, 1 mg (lot# KKSZ), 2 mg (lot# KZDD), 4 mg (lot# KWDX), 6 mg (lot# KKTB), 8 mg (lot# KZDK), 10 mg (lot# MGSC) and 20 mg (lot# MDGD), respectively, is **adequate**.

BIOEQUIVALENCE COMMENTS TO BE PROVIDED TO THE APPLICANT
(PROCESSED BY BIO-PM)

ANDA: 207098

APPLICANT: Taro Pharmaceutical Industries Ltd.

DRUG PRODUCT: Iloperidone Tablets, 1 mg, 2 mg, 4 mg, 6 mg, 8 mg, 10 mg,
and 12 mg

The Division of Bioequivalence II (DBII) has completed its review of the dissolution testing portion of your submission(s) acknowledged on the cover sheet and has no further questions at this time.

Your dissolution testing using the FDA-recommended method is acceptable. Your proposed specification is also acceptable. We acknowledge that you will conduct the dissolution testing for your test product using the following FDA-recommended dissolution method and specification:

USP Apparatus:	II (Paddle)
Rotational Speed:	50 rpm
Temperature:	37 ± 0.5°C
Media:	0.1N HCl
Volume:	500 mL
Specification:	NLT ^(b) ₍₄₎ % (Q) in 30 minutes

For future submissions, please be advised that the dissolution validation should be completed prior to the dissolution testing, and the dissolution method SOP should be effective at the time of testing.

Please note that the bioequivalence comments provided in this communication are preliminary. These comments are subject to revision after review of the in vivo studies.

Sincerely yours,

{See appended electronic signature page}

Ethan M. Stier, Ph.D., R.Ph.
Director
Division of Bioequivalence II
Office of Generic Drugs
Center for Drug Evaluation and Research

VI. OUTCOME

Enter Review Productivity and Generate Report

<http://cdsogd1/bioprod>

DIVISION OF BIOEQUIVALENCE REVIEW
TEMPLATE 2 (SIMPLE IMMEDIATE RELEASE PRODUCTS)

ANDA No.	207098		
Drug Product Name	Iloperidone Tablets		
Strength(s)	1 mg, 2 mg, 4 mg, 6 mg, 8 mg, 10 mg and 12 mg		
Applicant Name	Taro Pharmaceutical U.S.A., Inc.		
Applicant Address	3 Skyline Drive Hawthorne, NY 10532		
Contact	Kavita Srivastava		
US agent's Telephone Number	914 345 9001 (b) (6)		
US Agent's Fax Number	914 593 0078		
US Agent's Email Address	Kavita.srivastava@taro.com		
Original Submission Date(s)	06/02/2014		
Submission Date(s) of Amendment(s) Under Review	N/A		
Reviewer	Yang Chang, Pharm.D., Ph.D.		
Study Number (s)	PKD_13_459	PKD_13_460	2013-3306
Study Type (s)	Pivotal Fasting	Pivotal Fed	Pilot Fasting
Strength (s)	1 mg	1 mg	1 mg
Clinical Site	Sun Pharmaceutical Industries Ltd		Pharma Medica Research Inc.
Clinical Site Address	Clinical Pharmacology Unit, Sun Pharmaceutical Industries Ltd. Tandalja, Vadodara – 390 020 (India)		4770 Sheppard Avenue East Toronto, Ontario, Canada M1S 3V6
Analytical Site	(b) (4)		
Analytical Site Address			
OSIS Status	<u>Backlog, Year 1 and Year 2 ANDAs</u> <input type="checkbox"/> Pending <input checked="" type="checkbox"/> Complete		<u>Year 3 ANDAs</u> <input type="checkbox"/> To Be Determined by OSIS <input type="checkbox"/> Pending For Cause Inspection
OVERALL REVIEW RESULT	Inadequate		
REVISED/NEW DRAFT GUIDANCE INCLUDED	NO		
COMMUNICATION	<input type="checkbox"/> ECD <input checked="" type="checkbox"/> IR		

<input type="checkbox"/> NOT APPLICABLE			
BIOEQUIVALENCE STUDY TRACKING/SUPPORTING DOCUMENT #	STUDY/TEST TYPE	STRENGTH	REVIEW RESULT
#1	Fasting	1 mg	Adequate
#1	Fed	1 mg	Adequate
#1	Dissolution Waiver	2 mg	Inadequate
#1	Dissolution Waiver	4 mg	Inadequate
#1	Dissolution Waiver	6 mg	Inadequate
#1	Dissolution Waiver	8 mg	Inadequate
#1	Dissolution Waiver	10 mg	Inadequate
#1	Dissolution Waiver	12 mg	Inadequate

• **EXECUTIVE SUMMARY**

This application contains the results of the fasting and fed bioequivalence (BE) studies comparing a test product, Taro Pharmaceutical U.S.A., Inc.'s Iloperidone Tablets, 1 mg to the corresponding reference product Fanapt® (iloperidone) tablets, 1 mg. Each of the BE studies was designed as a single-dose, two-way crossover study in healthy male subjects. The firm's pivotal fasting and fed BE studies are adequate. The results are summarized in the tables below.

Iloperidone 1 mg Tablets						
Number of subject completed = 32 males, Dose: 1 mg						
Least square Geometric Means, Ratio of the Means and 90% Confidence Intervals						
Fasted Bioequivalence Study (PKD_13_459)						
Parameter	Test	N	Ref	N	Ratio %	90% C.I
Iloperidone						
AUC_{0-t} (pg.h/mL)	11557.68	32	11941.20	32	96.79	93.15 - 100.57
AUC_{0-∞} (pg.h/mL)	14965.66	32	14921.74	32	100.29	95.25 - 105.61
C_{max} (pg /mL)	423.87	32	439.58	32	96.43	90.69 - 102.53
P88 Metabolite						
AUC_{0-t} (pg.h/mL)	20347.85	31	21163.89	31	96.14	93.08 - 99.30
AUC_{0-∞} (pg.h/mL)	25988.12	31	27272.56	31	95.29	91.39 - 99.36
C_{max} (pg /mL)	657.13	32	677.39	32	97.01	92.48 - 101.76

Iloperidone 1 mg Tablets						
Number of subject completed = 32 males, Dose: 1 mg						
Least square Geometric Means, Ratio of the Means and 90% Confidence Intervals						
Fed Bioequivalence Study (PKD_13_460)						
Parameter	Test	N	Ref	N	Ratio %	90% C.I
Iloperidone						
AUC_{0-t} (pg.h/mL)	13619.19	32	13707.53	32	99.36	94.92 - 104.00
AUC_{0-∞} (pg.h/mL)	17514.85	32	16859.04	32	103.89	98.25 - 109.86
C_{max} (pg /mL)	470.34	32	478.87	32	98.22	92.87 - 103.88
P88 Metabolite						
AUC_{0-t} (pg.h/mL)	27155.07	31	27580.41	31	98.46	95.33 - 101.69
AUC_{0-∞} (pg.h/mL)	34089.74	31	34198.39	31	99.68	95.58 - 103.96
C_{max} (pg /mL)	742.74	31	777.65	31	95.51	91.85 - 99.32

In the pivotal BE studies, the pharmacokinetic (PK) parameters of the test and reference for the active metabolite P88 were comparable. Therefore the metabolite data are supportive and the studies are acceptable.

The firm conducted a pilot fasting study using two investigational formulations of the Iloperidone Tablets, 1 mg (i.e., lot #781983 and lot #781984). The goal of the pilot study was to investigate the effect of the particle size distribution (PSD) of API on the BE. Both investigational formulations have identical composition but different PSD of API. The PK parameters of the pilot fasting study met the BE criteria for both formulations. The firm selected lot # 781984 for the pivotal studies.

The firm did not provide the intensity of the adverse events in the pilot study including the severity/intensity of the AEs (i.e., mild, moderate, severe, serious etc.). The firm will be asked to provide this information.

The dissolution testing data was reviewed separately.¹ The dissolution data are inadequate with respect to supporting waiver requests of the other strengths, 2 mg, 4 mg, 6 mg, 8 mg, 10 mg and 12 mg.

The DB III denies the waivers of in vivo BE study requirements for the 2 mg, 4 mg, 6 mg, 8 mg, 10 mg, and 12 mg strengths based on criteria set forth in 21 CFR § 320.22 (d) (2).

Based on evaluation of the submitted data, the OSIS inspection of the clinical and analytical sites for the current ANDA is not necessary. The studies submitted in the current ANDA do not indicate any conduct issues and no data integrity deficiencies were identified by the reviewer. The current ANDA reviewer determined that the findings of the OSIS inspection identified for other NDA are not expected to impact the BE study outcomes of the current ANDA. The OSIS inspection status for the current ANDA is considered complete at this time.

The application is inadequate.

¹ GDRP, ANDA-207098-ORIG-1, Biopharmaceutics Primary Review 207098D060214.doc Review Sam Chan 13-Jan-2015

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• **SUBMISSION SUMMARY**

1.1 Drug Product Information^{2, 3}

Test Product	Iloperidone Tablets, 1 mg, 2 mg, 4 mg, 6 mg, 8 mg, 10 mg and 12 mg
Reference Product	Fanapt® (iloperidone) tablets, 1 mg*, 2 mg, 4 mg, 6 mg, 8 mg, 10 mg and 12 mg
RLD Manufacturer	Vanda Pharms Inc
NDA No.	022192
RLD Approval Date	May 6, 2009
Indication	FANAPT is an atypical antipsychotic agent indicated for the treatment of schizophrenia in adults.

*RLD

Fanapt® is a registered trademark of Vanda Pharmaceuticals Inc. and is used by Novartis Pharmaceuticals Corporation under license.³ The Fanapt® is manufactured (b) (4)

1.2 PK/PD Information

Bioavailability	The relative bioavailability of the tablet formulation compared to oral solution is 96%.
Food Effect	Administration of iloperidone with a standard high-fat meal did not significantly affect the C _{max} or AUC of iloperidone, P88, or P95, but delayed T _{max} by 1 hour for iloperidone, 2 hours for P88 and 6 hours for P95. FANAPT can be administered without regard to meals
T_{max}	2 to 4 hours
Metabolism	Iloperidone is metabolized primarily by three biotransformation pathways: carbonyl reduction, hydroxylation (mediated by CYP2D6) and O-demethylation (mediated by CYP3A4). There are two predominant iloperidone metabolites, P95 and P88. The iloperidone metabolite P95 represents 47.9% of the AUC of iloperidone and its metabolites in plasma at steady-state for extensive metabolizers (EM) and 25% for poor metabolizers (PM). The active metabolite P88 accounts for 19.5% and 34.0% of total plasma exposure in EM and PM, respectively. Iloperidone and P88 are not substrates of P-gp and iloperidone is a weak P-gp inhibitor.
Excretion	Elimination of iloperidone is mainly through hepatic metabolism involving two P450 isozymes, CYP2D6 and CYP3A4. The bulk of the radioactive materials were recovered in the urine (mean 58.2% and 45.1% in EM and PM, respectively), with feces accounting for 19.9% (EM) to 22.1% (PM) of the dosed radioactivity.

² http://www.accessdata.fda.gov/scripts/cder/ob/docs/obdetail.cfm?Appl_No=022192&TABLE1=OB_Rx

³ RLD label: http://www.accessdata.fda.gov/drugsatfda_docs/label/2014/022192s013lbl.pdf

⁴ EDR, NDA 022192, 09/27/2007, module 3.2.P.3.1

Half-life	The observed mean elimination half-lives for iloperidone, P88 and P95 in CYP2D6 extensive metabolizers (EM) are 18, 26 and 23 hours, respectively, and in poor metabolizers (PM) are 33, 37 and 31 hours, respectively.
Dosage and Administration	FANAPT must be titrated slowly from a low starting dose to avoid orthostatic hypotension due to its alpha-adrenergic blocking properties. The recommended starting dose for FANAPT tablets is 1 mg twice daily. Dose increases to reach the target range of 6-12 mg twice daily (12_24 mg/day) may be made with daily dosage adjustments not to exceed 2 mg twice daily (4 mg/day). The maximum recommended dose is 12 mg twice daily (24 mg/day). FANAPT doses above 24 mg/day have not been systematically evaluated in the clinical trials. Efficacy was demonstrated with FANAPT in a dose range of 6 to 12 mg twice daily. Prescribers should be mindful of the fact that patients need to be titrated to an effective dose of FANAPT. Thus, control of symptoms may be delayed during the first 1 to 2 weeks of treatment compared to some other antipsychotic drugs that do not require similar titration. Prescribers should also be aware that some adverse effects associated with FANAPT use are dose related. FANAPT can be administered without regard to meals.
Maximum Daily Dose	24 mg

1.3 OGD Recommendations for Drug Product

Number of studies recommended:	2, fasting and fed
---------------------------------------	--------------------

1.	Type of study:	Fasting
	Design:	Single-dose, two-way crossover <i>in-vivo</i>
	Strength:	1 mg (dose=1 mg*2 or 1 mg*3 depending on the assay sensitivity)
	Subjects:	Healthy males and non-pregnant females, general population
	Additional Comments:	N/A

2.	Type of study:	Fed
	Design:	Single-dose, two-way crossover <i>in-vivo</i>
	Strength:	1 mg (dose=1 mg*2 or 1 mg*3 depending on the assay sensitivity)
	Subjects:	Normal healthy males and females, general population
	Additional Comments:	The test and reference products should be administered 30 minutes after start of the meal.

Analytes to measure (in plasma/serum/blood):	Iloperidone and the active P88 metabolite in plasma
Bioequivalence based on:	90% CI of iloperidone

Waiver request of in-vivo testing:	2 mg, 4 mg, 6 mg, 8 mg, 10 mg and 12 mg, based on (i) acceptable bioequivalence study using the 1 mg tablets, (ii) proportional similarity in the formulations of the 1 mg, 2 mg, 4 mg, 6 mg, 8 mg, 10 mg and 12 mg strengths and (iii) acceptable comparable in vitro dissolution testing on all strengths.	
Source of most recent recommendations or provide the link to the current draft guidance:	http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM234968.pdf	
Summary of OGD or DB History	Pending ANDAs (Not Yet Reviewed)	Yes
	Approved ANDAs	No
	Previously Reviewed ANDAs	Yes
	Protocols	No
	Controls	No

1.4 Pre-Study Bioanalytical Method Validation

Study # 2013-3306 (pilot fasted)

Information Requested	Data
Bioanalytical method validation report location	N/A
Analyte	Iloperidone
Internal standard (IS)	Iloperidone- ¹³ C-d ₃
Method description	liquid chromatographic (LC) tandem mass spectrometric detection (MS/MS) method
Limit of quantitation	5.00 pg/mL
Average recovery of drug (%)	73.0 % to 80.0 %
Average recovery of IS (%)	77.1 %
Standard curve concentrations (units/mL)	5.00, 10.0, 25.0, 60.0, 150, 350, 800 and 1250 pg/mL
QC concentrations (units/mL)	QC A: 15.0 pg/mL, QC B: 625 pg/mL, QC C: 1000 pg/mL
QC Intraday precision range (%)	0.6 % to 5.5 %
QC Intraday accuracy range (%)	99.0 % to 106.3 %
QC Interday precision range (%)	2.7 % 3.1 %
QC Interday accuracy range (%)	102.0 % to 102.6 %
Bench-top stability (hrs)	19.50 hours @ room temperature
Stock stability (days)	28 days @ 5 ± 3°C
Processed stability (hrs)	49.50 hours @ approximately 5°C
Freeze-thaw stability (cycles)	4 cycles @ -25 ± 10°C
Long-term storage stability (days)	28 days @ -25 ± 10°C
Dilution integrity	Concentration diluted 2-fold and 5-fold
Selectivity	No interfering peaks noted in blank plasma samples
Analyte	P88 Metabolite
Internal standard (IS)	Iloperidone- ¹³ C-d ₃ Metabolite P88
Method description	liquid chromatographic (LC) tandem mass spectrometric

	detection (MS/MS) method
Limit of quantitation	5.00 pg/mL
Average recovery of drug (%)	73.6 % to 78.7 %
Average recovery of IS (%)	78.1 %
Standard curve concentrations (units/mL)	5.00, 10.0, 25.0, 60.0, 150, 350, 800 and 1250 pg/mL
QC concentrations (units/mL)	QC A: 15.0 pg/mL, QC B: 625 pg/mL, QC C: 1000 pg/mL
QC Intraday precision range (%)	1.0 % to 3.2 %
QC Intraday accuracy range (%)	98.1 % to 105.3 %
QC Interday precision range (%)	1.9 % 2.4 %
QC Interday accuracy range (%)	100.6 % to 102.0 %
Bench-top stability (hrs)	19.50 hours @ room temperature
Stock stability (days)	28 days@ 5 ± 3°C
Processed stability (hrs)	49.50 hours @ approximately 5°C
Freeze-thaw stability (cycles)	4 cycles @ -25 ± 10°C
Long-term storage stability (days)	28 days @ -25 ± 10°C
Dilution integrity	Concentration diluted 2-fold and 5-fold
Selectivity	No interfering peaks noted in blank plasma samples

Studies # PKD 13 459 & PKD 13 460 (pivotal fasted & fed)

Information Requested	Data
Bioanalytical Method Validation Report location	Report No.: (b) (4) Section 5-3-1-4 (Method Validation Report) ; Page – 1 - 164
Analyte	Iloperidone
Internal Standard (IS)	D3 Iloperidone
Method Description	Extraction Technique: Solid Phase Extraction; Detection mode: Tandem Mass Spectrometry with positive mode
Limit of quantitation	LLOQ : 20.5pg/mL / 21.5pg/mL(*)
Average recovery of drug (%)*	80.3% to 95.4%
Average recovery of IS (%)*	82.3%
Standard curve concentrations (pg/mL)	20.5, 40.9, 186.7, 433.6, 1108.0, 1589.7, 1926.9, 2505.0
QC Concentrations (pg/mL)	60.3, 180.8, 626.9, 1205.6, 2049.5
QC Intraday precision range (%)	2.1 % to 7.9%
QC Intraday accuracy range (%)	96.8% to 101.7%
QC Inter day precision range (%)	1.0% to 11.0%
QC Inter day accuracy range (%)	82.7% to 109.5%
Bench-top stability (hrs)	9 hours at room temperature
Stock stability (days)	14 days @ 2-8°C
Processed stability (hrs)	68 hours @ 6°C
Freeze-thaw stability (cycles)	03 cycles at -20±5°C, -35±5°C & -65±10°C
Long term storage stability (Days)	53 days at -20±5°C, -35±5°C & -65±10°C
Dilution Integrity	Concentration diluted 5-fold
Selectivity	No Significant Interference observed in blank plasma samples
Analyte	P88 Metabolite
Internal Standard (IS)	D3 Iloperidone
Method Description	Extraction Technique: Solid Phase Extraction; Detection mode: Tandem Mass Spectrometry with positive mode

Limit of quantitation	14.9 pg/mL
Average recovery of drug (%)*	66.2% to 76.6%
Average recovery of IS (%)*	82.3%
Standard curve concentrations (pg/mL)	14.9, 29.8, 148.8, 347.3, 868.2, 1265.1, 1562.7, 2009.2
QC Concentrations (pg/mL)	44.1, 132.3, 500.6, 953.5, 1621.0
QC Intraday precision range (%)	2.0% to 4.5%
QC Intraday accuracy range (%)	95.5% to 105.4%
QC Inter day precision range (%)	0.7% to 7.7%
QC Inter day accuracy range (%)	85.5% to 111.5%
Bench-top stability (hrs)	9 hours at room temperature (in Plasma)
Stock stability (days)	14 days @ 2-8°C
Processed stability (hrs)	68 hours @ 6°C
Freeze-thaw stability (cycles)	03 cycles at -20±5°C, -35±5°C & -65±10°C
Long term storage stability (Days)	53 days at -20±5°C, -35±5°C & -65±10°C
Dilution Integrity	Concentration diluted 5-fold
Selectivity	No Significant Interference observed in blank plasma samples

* Relative recovery

SOPs submitted	Yes
Does the duration of the each of the LTSS stability parameters support the sample preparation and assay dates	Yes

Comments on the Pre-Study Method Validation:

- The same anticoagulant K2EDTA was used in the pre-method validation and sample analysis.
- The long-term storage stability is adequate to cover the study period.
- The pre-study method validation is adequate.

1.5 In Vivo Studies

Study # PKD 13 459 (pivotal fasted)

Study Ref. No.	Study Objective	Study Design	Treatments (Dose, Dosage Form, Route) [Product ID]	Subjects (No. (M/F) Type Age: mean (Range))	Mean Parameters (+/-SD)						Study Report Location
					C _{max} ** (pg/mL)	T _{max} * (h)	AUC _{0-t} ** (pg.h/mL)	AUC _∞ (pg.h/mL)*	T _½ (h)**	K _{el} (hr ⁻¹)**	
PKD_13_459	To monitor the safety of the subjects participating in the study and to assess the bioequivalence of Iloperidone 1 mg Tablets of Taro Pharmaceutical Industries Ltd., and Fanapt® (Iloperidone) 1 mg Tablets off (b) (4) under Fasting Conditions	A randomized, open label, two treatment, two period, two sequence, single dose, crossover, bioequivalence study under fasting conditions	Test Dose: 1 mg Iloperidone 1 mg Tablets, Batch No.: 781984 (Taro Pharmaceuticals USA Inc., USA) p.o.	32 healthy subjects (32 M/ 0 F) 29.3 years (19-43)	Iloperidone						5.3.1.2
					Test 482.78 (49.7)	2.834 (1.67 - 6.00)	12623.33 (41.7)	16125.997 (39.7)	58.35 (35.3)	0.0131 (29.4)	
			Ref. 499.32 (46.9)		2.667 (2.00 - 5.00)	13114.70 (41.7)	16173.005 (39.2)	51.54 (22.1)	0.0141 (22.2)		
			P88 Metabolite								
			Test 712.21 (45.8)		3.75 (2.00 - 6.00)	21385.73 (41.1)	27515.017 (47.0)	57.87 (28.7)	0.0128 (25.2)		
			Ref. 727.43 (40.2)		3.50 (2.00 - 4.50)	22059.58 (40.4)	28504.766 (41.1)	60.67 (22.3)	0.0119 (19.6)		

** Presented as arithmetic mean (CV%)

* Presented as median and range

Study # PKD 13 460 (pivotal fed)

Study Ref. No.	Study Objective	Study Design	Treatments (Dose, Dosage Form, Route)	Subjects (No. (M/F) Type)	Mean Parameters (+/-SD)						Study Report Location
					C _{max} ** (pg/mL)	T _{max} * (h)	AUC _{0-t} ** (pg.h/mL)	AUC _∞ (pg.h/mL)*	T _½ (h)**	K _{el} (hr ⁻¹)**	

			[Product ID]	Age: mean (Range)				*			
PKD_13_460	To monitor the safety of the subjects participating in the study and to assess the bioequivalence of Iloperidone 1 mg Tablets of Taro Pharmaceutical Industries Ltd., and Fanapt® (Iloperidone) 1 mg Tablets off (b) (4) under Fed Conditions	A randomized, open label, two treatment, two period, two sequence, single dose, crossover, bioequivalence study under fed conditions.	Test Dose: 1 mg Iloperidone 1 mg Tablets, Batch No.: 781984 (Taro Pharmaceuticals USA Inc., USA) p.o.	32 healthy subjects (32 M/ 0 F)	Iloperidone						5.3.1.2
					Test 520.11 (42.9)	4.00 (1.50 - 6.00)	14832.29 (42.3)	19115.587 (42.0)	61.68 (59.8)	0.0134 (36.9)	
			Ref. Dose: 1 mg Fanapt® 1 mg Tablets, Lot No.: GVSB (b) (4) p.o.	31.3 years (21-43)	P88 Metabolite						
					Test 753.22 (23.7)	5.50 (2.67 - 8.00)	28134.73 (26.7)	35689.190 (29.8)	56.72 (19.3)	0.0126 (16.1)	
			Ref. 788.30 (26.1)	5.50 (3.33 - 8.00)	28574.01 (28.5)	35887.168 (31.3)	54.99 (18.9)	0.0131 (19.0)			

** Presented as arithmetic mean (CV%)

* Presented as median and range

Study #2013-3306 (pilot fasted)

Study Ref. No.	Study Objective	Study Design	Treatments (Dose, Dosage Form, Route) [Product ID]	Subjects (No. (M/F) Type Age: mean (Range)	Mean Parameters (+/-SD)						Study Report Location
					C _{max} ** (pg/mL)	T _{max} * (h)	AUC _{0-t} ** (pg.h/mL)	AUC _∞ (pg h/mL)**	T _{1/2} (h)**	K _{el} (hr ⁻¹)**	
2013-3306	A Pilot Single-Dose, Comparative Bioavailability	Open-label, single-dose, randomized, 3-period, 3-	Test A Dose: 1 mg Iloperidone 1 mg Tablets, Batch No.:	15 healthy subjects (7 M/ 8 F)	Analyte: Iloperidone						2.7 OGD tables
					Test A 853.07 (41)	2.50 (1.67-6.00)	11347.36 (31)	16264.88 (39)	45.81 (25)	0.0159 (23)	

Study of Three Formulations of Iloperidone 1 mg Tablets under Fasting Conditions	treatment, 3-sequence, crossover	781983 (Taro Pharmaceuticals USA Inc., USA) p.o.	41 years (24-57)	Test B 835.00 (36)	2.50 (1.67-5.00)	11356.06 (28)	15950.11 (31)	44.09 (21)	0.0164 (22)
		Test B Dose: 1 mg Iloperidone 1 mg Tablets, Batch No.: 781984 (Taro Pharmaceuticals USA Inc., USA) p.o.		Ref.C 829.67 (35)	2.00 (1.33-4.50)	10819.52 (23)	15965.88 (31)	48.13 (34)	0.0157 (27)
		Analyte: P88 Metabolite							
		Test A 528.80 (46)		4.00 (2.50-10.00)	16646.11 (48)	22735.65 (56)	35.80 (18)	0.0199 (17)	
		Test B 543.47 (42)		4.50 (2.50-8.00)	17092.42 (44)	23877.38 (47)	39.77 (19)	0.0180 (18)	
		Ref. Dose: 1 mg Fanapt® 1 mg Tablets. Lot No.: GVSB (b) (4) p.o.		Ref. 500.80 (38)	4.50 (2.50-10.00)	16243.32 (37)	23196.44 (45)	40.90 (22)	0.0176 (17)

** Presented as arithmetic mean (CV%)

* Presented as median and range

Table 2. Reanalysis of Study Samples

Study# PKD 13 459 (pivotal fasted)

Study Number: PKD 13 459								
Location in final report: Section 5-3-1-4; Pages 32, 33								
Reason why assay was repeated	Number of samples reanalyzed				Number of recalculated values used after reanalysis			
	Actual number		% of total assays		Actual number		% of total assays	
	T	R	T	R	T	R	T	R
Analyte	Iloperidone							
Pharmacokinetics ¹	0	0	0.00	0.00	0	0	0.00	0.00
Unacceptable internal standard response	1	0	0.06	0.00	1	0	0.06	0.00
Incomplete analysis	1	0	0.06	0.00	1	0	0.06	0.00
Concentration/ Response in pre-dose samples	1	1	0.06	0.06	0	0	0.00	0.00
Total	3	1	0.19	0.06	2	0	0.13	0.00
Analyte	P88 Metabolite							
Pharmacokinetics ¹	0	0	0.00	0.00	0	0	0.00	0.00
Unacceptable internal standard response	1	0	0.06	0.00	1	0	0.06	0.00
Incomplete analysis	1	0	0.06	0.00	1	0	0.06	0.00
Concentration/ Response in pre-dose samples	9	8	0.56	0.50	1	2	0.06	0.13
Total	11	8	0.69	0.50	3	2	0.19	0.13

¹ - If no repeats were performed for pharmacokinetic reasons, insert "0.0."

Study# PKD 13 460 (pivotal fed)

Study Number: PKD 13 460								
Location in final report: Section 5-3-1-4; Pages 31, 32								
Reason why assay was repeated	Number of samples reanalyzed				Number of recalculated values used after reanalysis			
	Actual number		% of total assays		Actual number		% of total assays	
	T	R	T	R	T	R	T	R
Analyte	Iloperidone							
Pharmacokinetics ¹	0	0	0.00	0.00	0	0	0.00	0.00

Unacceptable internal standard response	1	3	0.06	0.19	1	3	0.06	0.19
Concentration/ Response in pre-dose samples	1	3	0.06	0.19	0	1	0.00	0.06
Total	2	6	0.13	0.38	1	4	0.06	0.25
Analyte	P88 Metabolite							
Pharmacokinetics ¹	0	0	0.00	0.00	0	0	0.00	0.00
Unacceptable internal standard response	1	3	0.06	0.19	1	3	0.06	0.19
Concentration/ Response in pre-dose samples	9	11	0.56	0.69	1	1	0.06	0.06
Total	10	14	0.63	0.88	2	4	0.13	0.25

¹ - If no repeats were performed for pharmacokinetic reasons, insert "0.0."

Study # 2013-3306 (pilot fasted)

Study No. 2013-3306												
Additional information, 14.0 Analytical Report, Page(s): N/A												
Reason why assay was repeated	Number of samples reanalyzed						Number of recalculated values used after reanalysis					
	Actual number			% of assays			Actual number			% of assays		
	Test A	Test B	Ref.	Test A	Test B	Ref.	Test A	Test B	Ref.	Test A	Test B	Ref.
Analyte	Iloperidone											
Pharmacokinetic ¹	0	0	0	0	0	0	0	0	0	0	0	0
AULOQ ²	5	5	2	1.52	1.52	0.61	5	5	2	1.52	1.52	0.61
UISR ³	0	1	3	0	0.30	0.91	0	1	3	0	0.30	0.91
Total	5	6	5	1.52	1.82	1.52	5	6	5	1.52	1.82	1.52
Analyte	P88 Metabolite											
Pharmacokinetic ¹	0	0	0	0	0	0	0	0	0	0	0	0
UISR ³	0	1	2	0	0.30	0.61	0	1	2	0	0.30	0.61
Total	0	1	2	0	0.30	0.61	0	1	2	0	0.30	0.61

¹ - If no repeats were performed for pharmacokinetic reasons, insert "0.0."

² - Above the Upper Limit of Quantitation;

³ - Unacceptable Internal Standard Response.

Table 3. SOP’s Dealing with Bioanalytical Repeats of Study Samples

Study # 2013-3306 (pilot fasted)

SOP No.	Effective Date of SOP	SOP Title
	(b) (4)	Repeat Sample Analysis Procedure And Acceptance Criteria

Studies # PKD 13 459 & PKD 13 460 (pivotal fasted & fed)

SOP No.	Effective Date of SOP	SOP Title
	(b) (4)	Repeat sample(s) identification, re-analysis and reporting of final concentration (Revision No.: 06)

Is there any other particular concern that should be investigated further?	No
--	----

Comments from the Reviewer:

- The reviewer only reviewed the data of the parent drug iloperidone in the current review for acceptability for the pivotal fasting and fed studies. The metabolite data of the active P88 metabolite are considered as supportive information and were not reviewed in detail.
- There was no pharmacokinetic repeat in the pivotal fasting and fed studies.
- There were one repeat under code B (unacceptable internal standard response), one repeat under code C (incomplete analysis), and 2 repeats under code H (Concentration/ Response in pre-dose samples) in pivotal fasting study. The firm provided raw data to support these repeats. These samples were repeated according to pre-established SOP.
- There were 4 repeats under code B (unacceptable internal standard response) and 4 repeats under code H (Concentration/ Response in pre-dose samples) in the pivotal fed study. The firm provided raw data to support these repeats. These samples were repeated according to pre-established SOP.

1.6 Waiver Request(s) For Immediate Release Dosage Forms

Strengths for which waivers are requested, if applicable	2 mg, 4 mg, 6 mg, 8 mg, 10 mg, and 12 mg
Waiver regulation cited?	21 CFR 320.22 (d) (2)
Strengths considered for 21 CFR 320.24 (b)(6)	No
Proportional to strength tested in vivo?	Yes
Is dissolution acceptable?	Yes
Waivers granted?	WAIVERS DENIED
If not then why?	The firm's dissolution data is not acceptable.

1.7 Deficiency Comments

Please see deficiency letter.

1.8 Comments for Other OGD Disciplines

Discipline	Comment
--	

- APPENDIX

1.9 Individual Study Reviews

1.9.1 Single-dose Fasting Bioequivalence Study

1.9.1.1 Study Design

Table 4. Study Information

Study Number	PKD_13_459
Study Title	A randomized, open label, two treatment, two period, two sequence, single dose, crossover, bioequivalence study of iloperidone 1 mg tablets of taro pharmaceutical industries ltd., and fanapt® (iloperidone) 1 mg tablets of novartis pharmaceuticals corporation, in 32 healthy human adult subjects under fasting conditions
Clinical Site (Name & Address)	Clinical Pharmacology Unit, Sun Pharmaceutical Industries Ltd. Tandalja, Vadodara – 390 020 (India) Phone Number: 91-265-2350789, 91-265-6615500 Fax: 91-265-2354897
Principal Investigator	Dr. Aman Khanna MD Aman.Khanna@sunpharma.com
Dosing Dates	Period I: 05 December 2013, Period II: 19 December 2013
Analytical Site (Name & Address)	(b) (4)
Analysis Dates	From 03 rd January, 2014 to 21 st January, 2014 for Iloperidone and P88 Metabolite
Analytical Director	(b) (4)
Storage Period of Biostudy Samples (no. of days from the first day of sample collection to the last day of sample analysis)	48 days, -20°C±5°C to -65°C±10°C

Table 5. Product information

Product	Test	Reference
Treatment ID	A	B
Product Name	Iloperidone 1 mg Tablets	Fanapt® 1 mg Tablets
Manufacturer	Taro Pharmaceutical Industries Ltd., Israel	Vanda Pharms Inc
Batch/Lot No.	781984	GVSB

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Manufacture Date	07/2013	N/A
Expiration Date	N/A	04/2013
Strength	1 mg	1 mg
Dosage Form	Tablets	Tablets
Bio-Batch Size	(b) (4)	N/A
Production Batch Size	(b) (4)	N/A
Potency (Assay)	100.6%	100.5%
Content Uniformity (expressed as mean, %CV or per USP)	(b) (4) Meets current USP <905> requirements (Acceptance value L1<15.0)	N/A
Dose Administered	1 x 1 mg	1 x 1 mg
Route of Administration	Oral	Oral

Was the drug product administered per labeling (for specialized dosage forms e.g. ODT)?	Yes
--	-----

Table 6. Study Design, Single-Dose Fasting Bioequivalence Study

Number of Subjects	Enrolled: 34 Dosed: 32 Completed: 32 Samples Analyzed: 1594 Data Analyzed: 32
No. of Sequences	2
No. of Periods	2
No. of Treatment	2
No. of Groups	1
Washout Period	14 days
Randomization Scheme (Sequence of T and R)	Yes (module 5.3.1.2)
Blood Sampling Times	Total 25 blood samples in each period were drawn into vacutainers containing K ₂ EDTA as an anticoagulant, prior to drug administration pre-dose (10 mL each) and at 0.333, 0.667, 1.000, 1.333, 1.667, 2.000, 2.333, 2.667, 3.000, 3.500, 4.000, 4.500, 5.000, 6.000, 8.000, 10.000, 12.000, 16.000, 24.000, 36.000, 48.000, 72.000, 96.000 and 120.000 hours post dosing (1 x 5 mL each) in each study period. The pre-dose and post-dose samples were collected by direct vein puncture.

Blood Sample Processing & Storage (include storage temperature)	<p>All the study blood samples were centrifuged at 3300 rpm under refrigeration at $4 \pm 2^{\circ}\text{C}$ for 15 min within 1.5 hr of blood sampling collection. The resulting plasma samples from each blood samples were divided in to two aliquots (original & duplicate) and stored within 2 hours after collection in suitably labeled polypropylene tubes at $\leq -15^{\circ}\text{C}$ until transfer of study sample.</p> <p>The frozen plasma aliquots, accompanied by an inventory list and sufficient dry ice to maintain the aliquots in a frozen state were sent to the analytical facility in shipments through internal courier on 02 January 2014.</p> <p>The plasma samples of period I were stored at clinical facility at $\leq -15^{\circ}\text{C}$ for 29 days (05 December 2013 to 02 January 2014). The plasma samples of period II were stored at clinical facility at $\leq -15^{\circ}\text{C}$ for 15 days (19 December 2013 to 02 January 2014).</p>
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Comments on Study Design:

The study design is acceptable.

1.9.1.2 Clinical Results

Table 7. Demographics Profile of Subjects Completing the Bioequivalence Study

Study Number PKD 13 459			
		Treatment Groups	
		Test Product N = 32	Reference Product N = 32
Age (Years)	Mean \pm SD Range	29.3 +/- 6.75 19 – 43	29.3 +/- 6.75 19 – 43
Age Groups	< 18	0 (0.0%)	0 (0.0%)
	18-40	30 (93.8 %)	30 (93.8 %)
	41-64	2 (6.3%)	2 (6.3%)
	65-75	0 (0.0%)	0 (0.0%)
	>75	0 (0.0%)	0 (0.0%)
Sex	Male	32 (100.0%)	32 (100.0%)
	Female	0 (0.0%)	0 (0.0%)
Race	Asian	32 (100.0%)	32 (100.0%)
	Black	0 (0.0%)	0 (0.0%)
	Caucasian	0 (0.0%)	0 (0.0%)
	Hispanic	0 (0.0%)	0 (0.0%)
	Other	0 (0.0%)	0 (0.0%)
BMI	Mean \pm SD Range	21.52 \pm 2.325 18.6 – 24.9	21.52 \pm 2.325 18.6 – 24.9
Other Factors		N/A	N/A

Table 8. Dropout Information, Fasting Bioequivalence Study

Subject No.	Reason	Period	Replaced?
--			

Table 9. Study Adverse Events, Fasting Bioequivalence Study

Body System/Adverse Event	Reported Incidence by Treatment Groups	
	Fasted Bioequivalence Study Number: PKD_13_459	
MedDRA System Organ Class Preferred Term	Test	Reference
Investigations¹		
Aspartate aminotransferase increased	2 (66.7)	
Alanine aminotransferase increased	1 (33.3)	
Total	3 (100.0)	

¹ Since no biochemistry assessment (AST, ALT) was done after screening until check-out of period II, these adverse events were considered to be emerged from both the formulations.

Subjects Experiencing Emesis (Include in eCTD)

Subject Number*	Test/Reference	Period	Time Post-Dose	Duration Between Dosing and Emesis (hrs)
--				

Was the adverse event profile observed during the fasting bioequivalence study comparable for the test and reference product? Please comment.

- There is no substantial difference between the test and reference product for adverse event profile.
- Two subjects experienced 3 post dose adverse events in this study. Given no biochemistry assessment (AST, ALT) was done after screening until check-out of period II, these adverse events were considered to be possibly related to both the formulations.

Are there any serious adverse events or death? If so, are they reported to the OGD Safety Committee?

No deaths and serious adverse events were reported during the study.

Are there any other safety concerns based on the adverse event profile?

No.

Table 10. Protocol Deviations, Fasting Bioequivalence Study

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

Comments:

No dropout and protocol deviation were reported in the fasting study.

1.9.1.3 Bioanalytical Results

Table 11. Sample Analysis Calibration and Quality Control

Study# PKD 13 459 (pivotal fasted) - Iloperidone

Bioequivalence Study Number: PKD_13_459										
Analyte	Iloperidone									
Parameter	Standard Curve Samples									
Concentration (pg/mL)	21.2	21.2	42.3	193.1	448.4	1145.9	1644.1	1992.8	2491.0	2491.0
Inter Day Precision (% CV)	4.2	4.2	3.5	2.1	2.4	1.9	2.5	1.6	1.5	2.2
Inter Day Accuracy (% Actual)	100.7	99.9	98.1	104.3	99.8	98.7	100.5	99.8	99.2	99.0
Linearity	0.9930 to 0.9998									
Linearity range (pg/mL)	21.2 to 2491.0									
Limit of Quantitation (pg/mL)	21.2									

Study# PKD 13 459 (pivotal fasted) - Iloperidone

Bioequivalence Study Number: PKD_13_459					
Analyte	Iloperidone				
Parameter	Quality Control Samples				
Concentration (pg/mL)	62.5	187.6	650.3	1225.5	2050.8
Inter Day Precision (% CV)	3.2	2.9	2.1	2.5	1.8
Inter Day Accuracy (% Actual)	101.0	102.8	99.1	98.7	99.1

Study# PKD 13 459 (pivotal fasted) - P88 Metabolite

Bioequivalence Study Number: PKD_13_459										
Analyte	P88 Metabolite									
Parameter	Standard Curve Samples									
Concentration (pg/mL)	15.4	15.4	30.8	147.7	344.7	861.7	1255.7	1551.1	1994.3	1994.3
Inter Day Precision (% CV)	4.6	4.6	3.7	2.6	3.1	3.0	3.0	2.5	1.8	2.7
Inter Day Accuracy (% Actual)	101.1	100.7	95.8	103.0	100.4	98.6	101.2	100.1	99.7	99.5
Linearity	0.9967 to 0.9998									
Linearity range (pg/mL)	15.4 to 1994.3									

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Limit of Quantitation (pg/mL)	15.4
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Study# PKD 13 459 (pivotal fasted) - P88 Metabolite

Bioequivalence Study Number: PKD_13_459					
Analyte	P88 Metabolite				
Parameter	Quality Control Samples				
Concentration (pg/mL)	45.9	137.8	521.4	993.1	1638.7
Inter Day Precision (% CV)	4.9	3.3	2.9	2.7	2.7
Inter Day Accuracy (% Actual)	100.0	100.2	96.4	98.9	99.6

Are the concentrations of standard curve and QC samples relevant to the concentration of the samples?	Yes
Are there any concerns related to sample analysis (including reanalysis, run rejection, etc.)?	No

Were 20% of chromatograms included?	Yes
Did the firm provide 100% numerical raw data (e.g. peak height, peak area, response count of IS and analyte) in run sequence order (i.e. Run log) in the instrument printout format?	Yes

Table 12. SOP's Dealing with Sample Analysis

SOP No.	Effective Date of SOP	SOP Title
(b) (4)	(b) (4)	Estimation of Iloperidone and its P88 Metabolite in human K2EDTA plasma using Ultra High Performance Liquid Chromatography Method with Tandem mass spectrometry- (b) (4)
		Evaluation of stability of drug(s) in biological matrix and solutions.
		Bioanalytical Method Validation
		Verification of Chromatograms , Peak Integration and Chromatographic Acceptance Criteria
		Repeat sample(s) identification, re-analysis and reporting of final concentration
		Procedure for detection of statistical outliers
		Chromatographic Analysis of Study Sample
		Preparation, identification and acceptance criteria of stock solutions, calibration standards, quality control samples.
		Identification and reanalysis of incurred samples
		Partial Bioanalytical Method Validation

Comments:

- The calibration was produced from eight nominal concentration plasma samples over the linear ranges of 21.2pg/mL to 2491.0pg/mL for Iloperidone and 15.4pg/mL to 1994.3pg/mL for P88 Metabolite. The firm used duplicated samples for lowest and highest calibration standards, according SOP (b) (4)
- The calibration and quality control data for the sample analysis are acceptable.
- The firm conducted the Incurred Sample Reanalysis (ISR) in accordance with the SOP, and demonstrated that 97.5% (156 out of 160) of samples for iloperidone were within the acceptance range of $\pm 20\%$ for the percent difference between the original and reanalyzed values.

1.9.1.4 Pharmacokinetic Results

Is there a Tmax difference between T and R	No
Are any CIs marginal?	No
Were the subjects dosed in groups?	No
Is the study design replicate and/or reference-scaled?	No
Is sampling time adequate?	Yes

Overall Comment:

The fasting study is adequate.

**Table 13. Mean Plasma Concentrations, Single-Dose Fasting Bioequivalence Study
(Firm-Submitted Data in Firm's Format)**

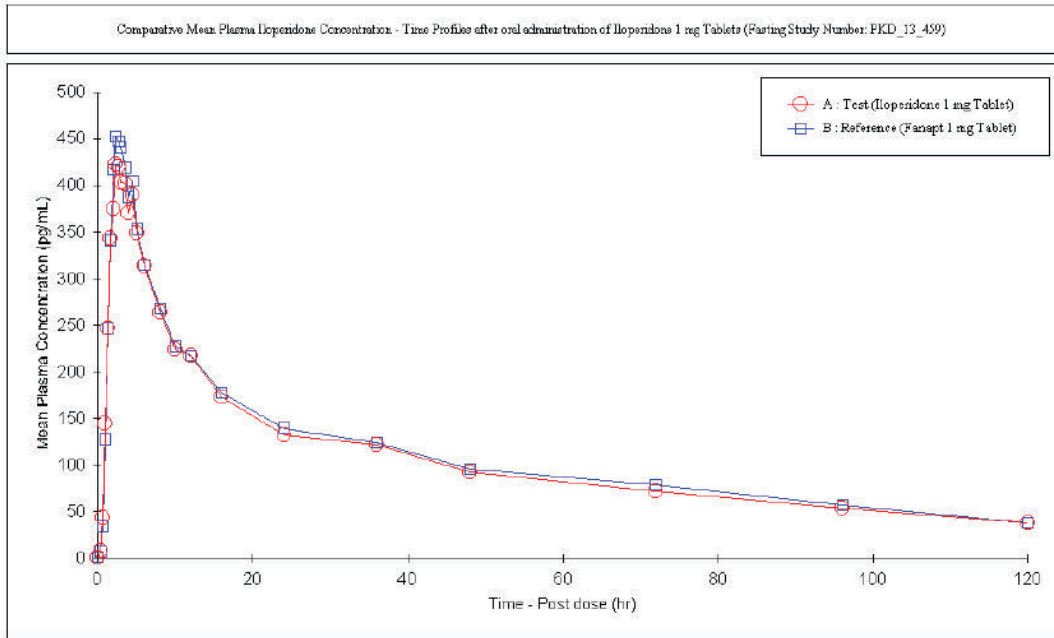
Least Square Means (pg/mL)

Collection Time (hr.)	TestLSM	RefLSM	# Significance	p Value
0.000	0.0000	0.6656	None	0.3253
0.333	7.7656	6.7937	None	0.7315
0.667	43.3781	33.7625	None	0.1178
1.000	144.0438	126.8781	None	0.4136
1.333	245.8094	246.8156	None	0.9642
1.667	343.2656	340.3875	None	0.9039
2.000	374.6750	416.4594	None	0.0661
2.333	422.7031	452.2250	None	0.3100
2.667	419.9937	447.7437	None	0.1609
3.000	402.9000	440.8281	None	0.0827
3.500	402.2031	418.6156	None	0.3855
4.000	370.5531	387.0938	None	0.3370
4.500	389.2656	403.6156	None	0.3082
5.000	348.2312	353.0219	None	0.6402
6.000	313.8031	316.0174	None	0.8537
8.000	263.0094	267.6250	None	0.5509
10.000	223.1406	227.4500	None	0.5559
12.000	217.2719	217.0656	None	0.9760
16.000	172.3594	176.9875	None	0.4684
24.000	131.9563	139.0438	None	0.1410
36.000	121.0125	123.6469	None	0.5614
48.000	92.1687	95.5219	None	0.2178
72.000	71.4351	78.6222	None	0.0523
96.000	52.9657	56.2049	None	0.0715
120.000	37.4875	37.0658	None	0.8423

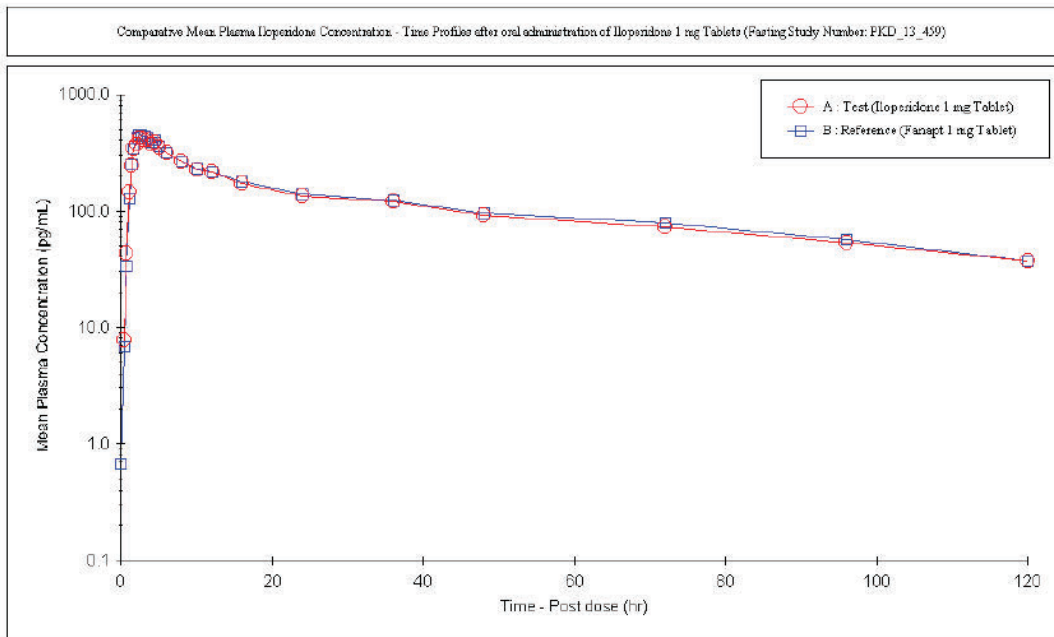
Results of the statistical evaluation by ANOVA ($\alpha=0.05$) for the hypothesis of equal treatment effects. None indicate that no statistical significant difference was detected between treatment means ($P > 0.05$) at the sampling time evaluated.

Figure 1. Mean Plasma Concentrations, Single-Dose Fasting Bioequivalence Study (Firm-Submitted Plot)

Linear Plot of Mean Plasma Concentration-Time profile of Iloperidone (N = 32):



Semi Logarithmic Plot of Mean Plasma Concentration-Time profile of Iloperidone (N=32):



1.9.2 Single-dose Fed Bioequivalence Study

1.9.2.1 Study Design

Table 14. Study Information

Study Number	PKD_13_460
Study Title	A randomized, open label, two treatment, two period, two sequence, single dose, crossover, bioequivalence study of iloperidone 1 mg tablets of taro pharmaceutical industries Ltd., and fanapt® (iloperidone) 1 mg tablets of novartis pharmaceuticals corporation, in 32 healthy human adult subjects under fed conditions.
Clinical Site (Name & Address)	Clinical Pharmacology Unit, Sun Pharmaceutical Industries Ltd. Tandalja, Vadodara – 390 020 (India) Phone Number: 91-265-2350789, 91-265-6615500 Fax: 91-265-2354897
Principal Investigator	Dr. Aman Khanna MD Aman.Khanna@sunpharma.com
Dosing Dates	Period I: 05 December 2013, Period II: 19 December 2013
Analytical Site (Name & Address)	(b) (4)
Analysis Dates	From 04 th January, 2014 to 21 st January, 2014 for Iloperidone and P88 Metabolite
Analytical Director	(b) (4)
Storage Period of Biostudy Samples (no. of days from the first day of sample collection to the last day of sample analysis)	48 days, -20 ^o C±5 ^o C to -65 ^o C±10 ^o C

Table 15. Product Information

Product	Test	Reference
Treatment ID	A	B
Product Name	Iloperidone 1 mg Tablets	Fanapt® 1 mg Tablets
Manufacturer	Taro Pharmaceutical Industries Ltd., Israel	(b) (4)
Batch/Lot No.	781984	GVSB
Manufacture Date	07/2013	N/A
Expiration Date	N/A	04/2013
Strength	1 mg	1 mg

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Dosage Form	Tablets	Tablets
Bio-Batch Size	(b) (4)	N/A
Production Batch Size	(b) (4)	N/A
Potency (Assay)	100.6%	100.5%
Content Uniformity (expressed as mean, %CV or per USP)	(b) (4) Meets current USP <905> requirements (Acceptance value L1<15.0)	N/A
Dose Administered	1 x 1 mg	1 x 1 mg
Route of Administration	Oral	Oral

Was the drug product administered per labeling?	Yes
--	-----

Table 16. Study Design, Single-Dose Fasting Bioequivalence Study

Number of Subjects	Enrolled: 33 Dosed: 32 Completed:32 Samples Analyzed:1597 Data Analyzed: 32
No. of Sequences	2
No. of Periods	2
No. of Treatments	2
No. of Groups	1
Washout Period	14 days
Randomization Scheme (Sequence of T and R)	Yes (module 5.3.1.2)
Blood Sampling Times	Total 25 blood samples in each period were drawn into vacutainers containing K ₂ EDTA as an anticoagulant, prior to drug administration pre-dose (10 mL each) collected within 1 hour prior to schedule dosing, and at 0.500, 1.000, 1.500, 2.000, 2.333, 2.667, 3.000, 3.333, 3.667, 4.000, 4.500, 5.000, 5.500, 6.000, 7.000, 8.000, 12.000, 16.000, 24.000, 36.000, 48.000, 72.000, 96.000 and 120.00 hours post dosing (1 x 5 mL each) in each study period. The predose and post-dose samples were collected by direct vein puncture.

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<p>Storage Period of Biostudy Samples (no. of days from the first day of sample collection to the last day of sample analysis)</p>	<p>All the study blood samples were centrifuged at 3300 rpm under refrigeration at $4 \pm 2^{\circ}\text{C}$ for 15 min within 1.5 hr of blood sampling collection. The resulting plasma samples from each blood samples were divided in to two aliquots (original & duplicate) and stored within 2 hours after collection in suitably labeled polypropylene tubes at $\leq -15^{\circ}\text{C}$ until transfer of study sample.</p> <p>The frozen plasma aliquots, accompanied by an inventory list and sufficient dry ice to maintain the aliquots in a frozen state were sent to the analytical facility in shipments through internal courier on 31 December 2013.</p> <p>The plasma samples of period I were stored at clinical facility at $\leq -15^{\circ}\text{C}$ for 27 days (05 December 2013 to 31 December 2013). The plasma samples of period II were stored at clinical facility at $\leq -15^{\circ}\text{C}$ for 13 days (19 December 2013 to 31 December 2013).</p>
---	--

<p>Standard FDA Meal Used?</p>	<p>No The meal satisfies caloric requirements per the general guidance.</p>
---------------------------------------	---

Composition of Non-standard FDA Meal Used in Fed Bioequivalence Study						
Ingredients		Amount (g) Raw Weight	Energy (kcal)	Protein (kcal)	Fat (kcal)	Carbohydrate (kcal)
SANDWICH						
Omelet	2 Eggs	120	208.00	64.00	144.00	0.00
	Onion	20	10.24	1.44	0.00	8.80
	Green Chilies	5	1.20	0.60	0.00	0.60
Boiled Potato (Hash brown)		120	116.00	8.00	0.00	108.00
2 Slices of bread (Toasted)		48	116.60	14.00	9.00	93.60
Goat meat		24	28.30	20.56	7.74	0.00
Butter		30	216.00	0.00	216.00	0.00
Cheese		30	104.25	28.92	67.77	7.56
MILK						
Milk (cow's)		240	166.00	32.00	90.00	44.00
Sugar		5	20.00	0.00	0.00	20.00
TOTAL (K calories)			986.59	169.52	534.51	282.56
PERCENTAGE			100.00	17.18	54.18	28.64

Comments on Study Design:

The study design is acceptable.

1.9.2.2 Clinical Results

Table 17. Demographics Profile of Subjects Completing the Bioequivalence Study

Study Number PKD 13 460			
		Treatment Groups	
		Test Product N = 32	Reference Product N = 32
Age (Years)	Mean ± SD Range	31.3 +/- 7.16 21 – 43	31.3 +/- 7.16 21 – 43
Age Groups	< 18	0 (0.0%)	0 (0.0%)
	18-40	28 (87.5 %)	28 (87.5 %)
	41-64	4 (12.5 %)	4 (12.5 %)
	65-75	0 (0.0%)	0 (0.0%)
	>75	0 (0.0%)	0 (0.0%)
Sex	Male	32 (100.0%)	32 (100.0%)
	Female	0 (0.0%)	0 (0.0%)
Race	Asian	32 (100.0%)	32 (100.0%)
	Black	0 (0.0%)	0 (0.0%)
	Caucasian	0 (0.0%)	0 (0.0%)
	Hispanic	0 (0.0%)	0 (0.0%)
	Other	0 (0.0%)	0 (0.0%)
BMI	Mean ± SD Range	21.31 ± 2.256 18.6 – 24.9	21.31 ± 2.256 18.6 – 24.9
Other Factors		N/A	N/A

Table 18. Dropout Information, Fed Bioequivalence Study

Subject No.	Reason	Period	Replaced?
--			

Table 19. Study Adverse Events, Fed Bioequivalence Study

Body System/Adverse Event	Reported Incidence by Treatment Groups	
	Fed Bioequivalence Study Number: PKD_13_460	
MedDRA System Organ Class Preferred Term	Test	Reference
Investigations¹		
Aspartate aminotransferase increased	1 (50.0)	
Alanine aminotransferase increased	1 (50.0)	
Total	2 (100.0)	

¹ Since no biochemistry assessment (AST, ALT) was done after screening until check-out of period II, these adverse events were considered to be emerged from both the formulations.

Subjects Experiencing Emesis (Include in eCTD)

Subject Number*	Test/Reference	Period	Time Post-Dose	Duration Between Dosing and Emesis (hrs)
--				

Was the adverse event profile observed during the fasting bioequivalence study comparable for the test and reference product? Please comment.

- There is no substantial difference between the test and reference product for adverse event profile.
- Two subjects experienced 3 post dose adverse events in this study. Given no biochemistry assessment (AST, ALT) was done after screening until check-out of period II, these adverse events were considered to be possibly related to both the formulations.

Are there any serious adverse events or death? If so, are they reported to the OGD Safety Committee?

No deaths and serious adverse events were reported during the study.

Are there any other safety concerns based on the adverse event profile?

No.

Table 20. Protocol Deviations, Fed Bioequivalence Study

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

Comments:

No dropout and protocol deviation were reported in the fed study.

1.9.2.3 Bioanalytical Results

Table 21. Sample Analysis Calibration and Quality Control

14.3Study# PKD 13 460 (pivotal fed) - Iloperdone

Bioequivalence Study Number: PKD_13_460										
Analyte	Iloperidone									
Parameter	Standard Curve Samples									
Concentration (pg/mL)	21.2	21.2	42.3	193.1	448.4	1145.9	1644.1	1992.8	2491.0	2491.0
Inter Day Precision (% CV)	5.4	5.0	4.1	1.6	1.5	1.3	1.6	1.0	1.7	1.3
Inter Day Accuracy (% Actual)	99.2	101.1	98.5	103.5	100.0	98.9	100.5	100.2	99.2	98.9
Linearity	0.9983 to 0.9998									
Linearity range	21.2 to 2491.0									

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(pg/mL)	
Limit of Quantitation (pg/mL)	21.2

Study# PKD 13 460 (pivotal fed) - Iloperdone

Bioequivalence Study Number: PKD_13_460					
Analyte	Iloperidone				
Parameter	Quality Control Samples				
Concentration (pg/mL)	62.5	187.6	650.3	1225.5	2050.8
Inter Day Precision (% CV)	4.1	11.2	2.0	1.8	1.7
Inter Day Accuracy (% Actual)	101.9	103.5	99.4	98.4	98.9

Study# PKD 13 460 (pivotal fed) - P88 Metabolite

Bioequivalence Study Number: PKD_13_460										
Analyte	P88 Metabolite									
Parameter	Standard Curve Samples									
Concentration (pg/mL)	15.4	15.4	30.8	147.7	344.7	861.7	1255.7	1551.1	1994.3	1994.3
Inter Day Precision (% CV)	5.0	4.9	5.5	2.6	1.6	2.0	2.2	1.6	1.4	1.8
Inter Day Accuracy (% Actual)	99.7	101.6	97.0	102.0	100.2	99.9	100.6	100.2	99.6	99.2
Linearity	0.9954 to 0.9997									
Linearity range (pg/mL)	15.4 to 1994.3									
Limit of Quantitation (pg/mL)	15.4									

Study# PKD 13 460 (pivotal fed) - P88 Metabolite

Bioequivalence Study Number: PKD_13_460					
Analyte	P88 Metabolite				
Parameter	Quality Control Samples				
Concentration (pg/mL)	45.9	137.8	521.4	993.1	1638.7
Inter Day Precision (% C.V.)	4.7	3.1	2.8	2.0	2.6
Inter Day Accuracy (% Actual)	99.3	99.5	96.6	98.8	99.3

Are the concentrations of standard curve and QC samples relevant to the concentration of the samples?	Yes
Are there any concerns related to sample reanalysis or run rejection?	No

Were 20% of chromatograms included?	Yes
Did the firm provide numerical raw data (e.g. peak height, peak area, response count of IS and analyte) in run sequence order (i.e. Run log) in the instrument printout format?	Yes

Table 22. SOP's Dealing with Sample Analysis

SOP No	Effective Date of SOP	SOP Title
(b) (4)	(b) (4)	Estimation of Iloperidone and its P88 Metabolite in human K2EDTA plasma using Ultra High Performance Liquid Chromatography Method with Tandem mass spectrometry- (b) (4)
		Evaluation of stability of drug(s) in biological matrix and solutions.
		Bioanalytical Method Validation
		Verification of Chromatograms , Peak Integration and Chromatographic Acceptance Criteria
		Repeat sample(s) identification, re-analysis and reporting of final concentration
		Procedure for detection of statistical outliers
		Chromatographic Analysis of Study Sample
		Preparation, identification and acceptance criteria of stock solutions, calibration standards, quality control samples.
		Identification and reanalysis of incurred samples
		Partial Bioanalytical Method Validation

Comments:

- The calibration was produced from eight nominal concentration plasma samples over the linear ranges of 21.2pg/mL to 2491.0pg/mL for Iloperidone and 15.4pg/mL to 1994.3pg/mL for P88 Metabolite. The firm used duplicated samples for lowest and highest calibration standards, according SOP (b) (4)
- The calibration and quality control data for the sample analysis are acceptable.
- The firm conducted the Incurred Sample Reanalysis (ISR) in accordance with the SOP, and demonstrated that 99.4% (159 out of 160) of samples for iloperidone were within the acceptance range of $\pm 20\%$ for the percent difference between the original and reanalyzed values.

1.9.2.4 Pharmacokinetic Results

Is there a Tmax difference between T and R	No
Are any CIs marginal?	No
Were the subjects dosed in groups?	No
Is the study design replicate and/or reference-scaled?	No
Is sampling time adequate?	Yes

Overall Comment:

The fed study is adequate.

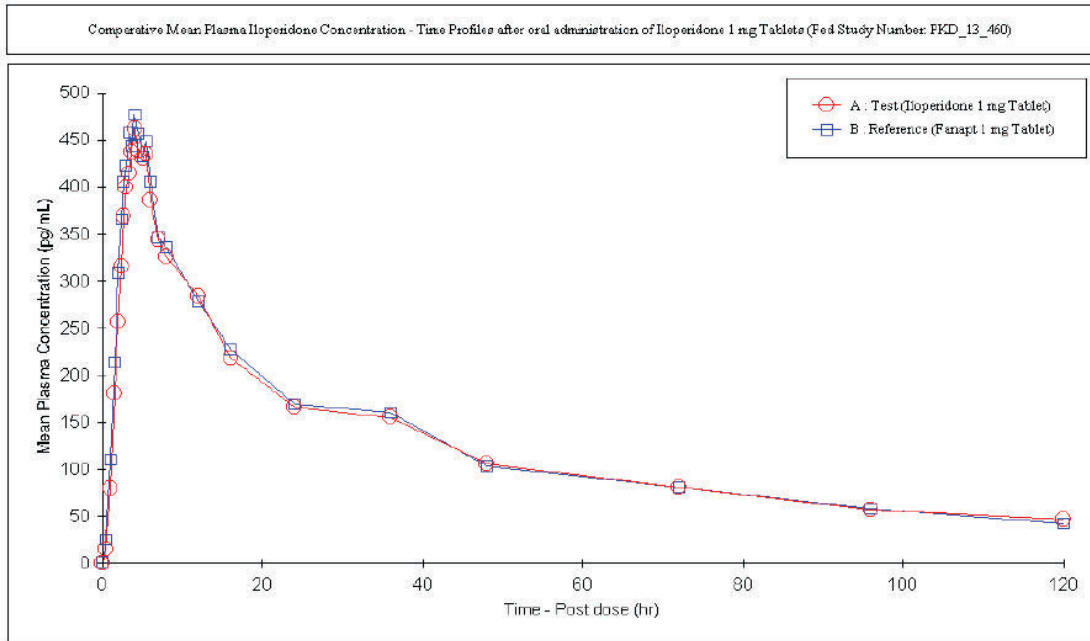
**Table 23. Mean Plasma Concentrations, Single-Dose Fed Bioequivalence Study
(Firm-submitted Data in Firm's Format)**

Least Square Means (pg/mL)				
Collection Time (hr.)	TestLSM	RefLSM	Significance [#]	p Value
0.000	0.0000	0.7250	None	0.3253
0.500	14.7438	25.3063	None	0.2655
1.000	79.1937	109.6906	None	0.2251
1.500	180.1500	213.7156	None	0.4129
2.000	256.4062	309.0250	None	0.2208
2.333	315.5531	365.4500	None	0.1834
2.667	369.2562	404.9438	None	0.3098
3.000	399.4406	421.7906	None	0.4204
3.333	414.8687	457.8969	< 0.05	0.0464
3.667	436.6875	444.1875	None	0.6209
4.000	462.1625	476.3688	None	0.2175
4.500	438.0719	456.0000	None	0.2365
5.000	430.2156	432.0969	None	0.9104
5.500	435.1812	448.5969	None	0.4275
6.000	385.8125	405.7719	None	0.1823
7.000	343.7375	346.3344	None	0.8154
8.000	325.9250	335.5438	None	0.3584
12.000	283.6813	278.3406	None	0.5343
16.000	217.4219	227.1656	None	0.1502
24.000	165.5500	168.8938	None	0.5578
36.000	154.9406	159.7813	None	0.3687
48.000	105.1625	103.0594	None	0.5880
72.000	80.0319	80.6781	None	0.8358
96.000	56.5976	57.5843	None	0.7120
120.000	46.3687	41.9406	None	0.0839

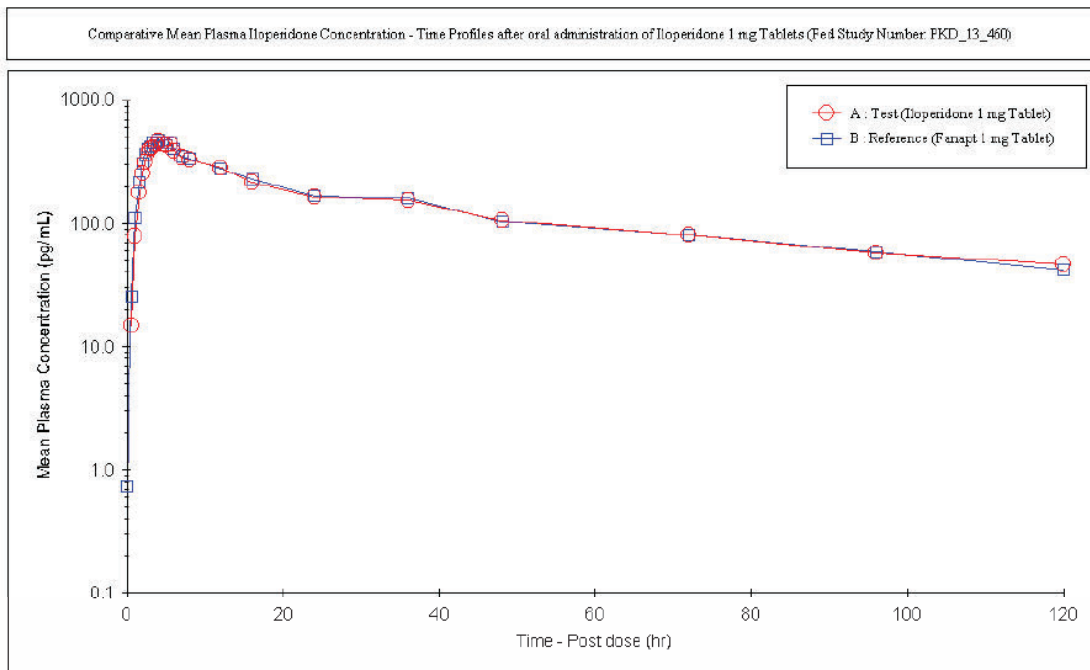
[#]Results of the statistical evaluation by ANOVA ($\alpha = 0.05$) for the hypothesis of equal treatment effects. None indicate that no statistical significant difference was detected between treatment means ($P > 0.05$) at the sampling time evaluated.

**Figure 2. Mean Plasma Concentrations, Single-Dose Fed Bioequivalence Study
(Firm-submitted Plot)**

Linear plot of mean plasma concentration-time profile of Iloperidone (N=32):



Semi Logarithmic Plot of Mean Plasma Concentration-time profile of Iloperidone (N=32):



1.9.3 Pilot Fasting Study

1.9.3.1 Study Design

Study Information

Study Number	2013-3306
Study Title	A Single-Dose, Comparative Bioavailability Study of Three Formulations of Iloperidone 1 mg Tablets under Fasting Conditions
Clinical Site (Name & Address)	Pharma Medica Research Inc. 4770 Sheppard Avenue East Toronto, Ontario, Canada M1S 3V6 Phone: (416) 759-4111 Fax: (416) 759-2869
Principal Investigator	Xueyu (Eric) Chen, M.D., Ph.D., FRCP(C), Email: echen@pharmamedica.com
Dosing Dates	September 09, 2013; September 18, 2013 and September 27, 2013
Analytical Site (Name & Address)	(b) (4)
Analysis Dates	October 02, 2013 to October 07, 2013
Analytical Director	(b) (4)
Storage Period of Biostudy Samples (no. of days from the first day of sample collection to the last day of sample analysis)	28 days, -35°C to -15°C

Product Information

Product	Test A	Test B	Reference
Treatment ID	A	B*	C
Product Name	Iloperidone 1 mg Tablets	Iloperidone 1 mg Tablets	Fanapt® 1 mg Tablets
Manufacturer	(b) (4)		
Batch/Lot No.	781983	781984	GVSB
Manufacture Date	07/2013	07/2013	N/A
Expiration Date	N/A	N/A	04/2013
Strength	1 mg	1 mg	1 mg
Dosage Form	Tablets	Tablets	Tablets
Bio-batch Size	(b) (4)		
Production Batch Size	(b) (4)		
Potency	97.9%	100.6%	100.5%

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Content Uniformity (mean, %CV)	Not submitted	L1=3.5<15	N/A
Dose Administered	1 x 1 mg	1 x 1 mg	1 x 1 mg
Route of Administration	Oral	Oral	Oral

N/A: Not Applicable

*The formulation B (lot# 781984) was selected for the pivotal studies

1.9.3.2 Clinical Results

Demographics Profile of Subjects Completing the Bioequivalence Study

Study No: 2013-3306			
		Treatment Groups	
		Test Product N = 15	Reference Product N = 15
Age (years)	Mean ± SD Range	41 ± 12 24 - 57	41 ± 12 24 - 57
Age Group	< 18	0 (0.0%)	0 (0.0%)
	18 - 40	7 (46.7%)	7 (46.7%)
	41 - 64	8 (53.3%)	8 (53.3%)
	65 - 75	0 (0.0%)	0 (0.0%)
	> 75	0 (0.0%)	0 (0.0%)
Sex	Male	7 (46.7%)	7 (46.7%)
	Female	8 (53.3%)	8 (53.3%)
Race	Asian	2 (13.3%)	2 (13.3%)
	Black	4 (26.7%)	4 (26.7%)
	Caucasian	9 (60.0%)	9 (60.0%)
	Hispanic	4 (26.7%)	4 (26.7%)
	Other	0 (0.0%)	0 (0.0%)
BMI	Mean ± SD	26.9 ± 2.5	26.9 ± 2.5
	Range	22.4 - 30.0	22.4 - 30.0
Other Factors		N/A	N/A

Dropout Information, Fasting Bioequivalence Study

Subject No.	Reason	Period	Replaced?
--			

Incidence of Adverse Events in Individual Studies Study # 2013-3306 (pilot fasted)

System Organ Class Term Preferred Term	Reported Incidence by Treatment Groups		
	Fasted Bioequivalence Study Study No: 2013-3306		
	Test A N = 15	Test B N = 15	Ref C N = 15
Cardiac disorders			
Bradycardia	0 (0.0%)	1 (6.7%)	0 (0.0%)
Eye disorders			
Eye irritation	1 (6.7%)	1 (6.7%)	0 (0.0%)
Gastrointestinal disorders			

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Abdominal discomfort	1 (6.7%)	0 (0.0%)	0 (0.0%)
Abdominal distension	1 (6.7%)	0 (0.0%)	0 (0.0%)
Abdominal pain upper	0 (0.0%)	0 (0.0%)	1 (6.7%)
Constipation	3 (20.0%)	1 (6.7%)	0 (0.0%)
Flatulence	1 (6.7%)	1 (6.7%)	0 (0.0%)
Nausea	0 (0.0%)	0 (0.0%)	1 (6.7%)
Metabolism and nutrition disorders			
Decreased appetite	1 (6.7%)	1 (6.7%)	0 (0.0%)
Nervous system disorders			
Dizziness	1 (6.7%)	0 (0.0%)	0 (0.0%)
Headache	1 (6.7%)	1 (6.7%)	2 (13.3%)
Presyncope	0 (0.0%)	1 (6.7%)	0 (0.0%)
Somnolence	10 (66.7%)	11 (73.3%)	11 (73.3%)
Respiratory, thoracic and mediastinal disorders			
Nasal congestion	1 (6.7%)	0 (0.0%)	1 (6.7%)
Vascular disorders			
Hypertension	0 (0.0%)	1 (6.7%)	1 (6.7%)
Hypotension	1 (6.7%)	0 (0.0%)	1 (6.7%)
*Total	11 (73.3%)	12 (80.0%)	12 (80.0%)

*Total and percentage count is based on each subject who experienced at least one AE in each of the treatments.

Subjects Experiencing Emesis (Include in eCTD)

Subject Number*	Test/Reference	Period	Time Post-Dose	Duration Between Dosing and Emesis (hrs)
--				

Protocol Deviations, Fasting Bioequivalence Study

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

1.9.3.3 Bioanalytical Results

Summary of Standard Curve and QC Data for Bioequivalence Sample Analyses Iloperidone

Bioequivalence Study No. Bioequivalence Study No. 2013-3306								
Analyte	Iloperidone							
Parameter	Standard Curve Samples							
Concentration (pg/mL)	5.00	10.0	25.0	60.0	150.0	350.0	800.0	1250.0
Inter day Precision (%CV)	3.5	2.8	2.3	1.2	2.3	2.0	1.1	0.9

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Inter day Accuracy (%Actual)	106.2	100.0	95.6	101.0	98.0	98.3	100.9	100.2
Linearity	0.9997 to 1.0000							
Linearity Range (pg/mL)	5.00 to 1250							
Sensitivity/LOQ (pg/mL)	5.00							

Bioequivalence Study No. 2013-3306			
Analyte	Iloperidone		
Parameter	Quality Control Samples		
Concentration (pg/mL)	15.0	625	1000
Inter day Precision (%CV)	3.1	3.1	2.2
Inter day Accuracy (%Actual)	104.7	101.9	100.9

P88 Metabolite

Bioequivalence Study No. 2013-3306								
Analyte	P88 Metabolite							
Parameter	Standard Curve Samples							
Concentration (pg/mL)	5.00	10.0	25.0	60.0	150.	350.	800.	1250.
Inter day Precision (%CV)	3.4	2.5	1.3	2.9	2.3	2.1	1.1	1.1
Inter day Accuracy (%Actual)	102.8	102.0	97.2	101.0	97.3	98.6	101.8	99.6
Linearity	0.9997 to 0.9999							
Linearity Range (pg/mL)	5.00 to 1250							
Sensitivity/LOQ (pg/mL)	5.00							

Bioequivalence Study No. 2013-3306			
Analyte	P88 Metabolite		
Parameter	Quality Control Samples		
Concentration (pg/mL)	15.0	625	1000
Inter day Precision (%CV)	2.5	3.0	2.7
Inter day Accuracy (%Actual)	101.3	100.6	100.6

1.9.3.4 Pharmacokinetic Results

Drug: Iloperidone						
No of subjects completed = 7 males and 8 females, Dose 1 mg						
LS Geometric Means, Ratio of Means, and 90% Confidence Intervals						
Test A Batch # 781983						
Parameter	Test A	N	Ref	N	Ratio (%)	90% C.I.
Iloperidone						
AUC _{0-t} (pg.h/mL)	10801.20	15	10549.47	15	102.39	95.43 - 109.85
AUC _{0-∞} (pg.h/mL)	15170.26	15	15063.82	14	100.71	94.23 - 107.63

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Cmax (pg /mL)	786.00	15	787.13	15	99.86	87.99 - 113.33
P88 Metabolite						
AUC_{0-t} (pg.h/mL)	14643.56	15	14929.23	15	98.09	93.03 - 103.42
AUC_{0-∞} (pg.h/mL)	19427.48	15	20886.92	15	93.01	88.30 - 97.98
Cmax (pg /mL)	467.60	15	462.44	15	101.12	94.47 - 108.23
Test B Batch # 781984						
Parameter	Test B	N	Ref	N	Ratio (%)	90% C.I.
Iloperidone						
AUC_{0-t} (pg.h/mL)	10989.29	15	10549.47	15	104.17	97.10 - 111.76
AUC_{0-∞} (pg.h/mL)	15312.05	15	15063.82	14	101.65	95.11 - 108.64
Cmax (pg /mL)	793.39	15	787.13	15	100.79	88.81 - 114.39
P88 Metabolite						
AUC_{0-t} (pg.h/mL)	15278.68	15	14929.23	15	102.34	97.07 - 107.90
AUC_{0-∞} (pg.h/mL)	21032.01	15	20886.92	15	100.69	95.59 - 106.07
Cmax (pg /mL)	486.79	15	462.44	15	105.27	98.34 - 112.67

Reviewer's Comments:

- The firm conducted a pilot fasting study to study the effect of the PSD of API on the BE using batches 781983 with PSD of D(0.9) (b) (4) and 781984 DS with PSD of D(0.9) (b) (4). The study results indicated that both batches 781983 and 781984 met the BE criteria. The firm conducted the pivotal studies with batch 781984, which contains micronized Iloperidone D(0.9) (b) (4).
- The firm did not provide the intensity of the adverse events in the pilot study including the severity/intensity of the AEs (i.e., mild, moderate, severe, serious etc.). The firm will be asked to provide this information.

1.10 Formulation Data

Ingredient	Amount (mg) / Tablet						
	1 mg*	2 mg	4 mg	6mg	8 mg	10 mg	12 mg
Iloperidone	1.000	2.000	4.00	6.00	8.00	10.00	12.00
Microcrvstalline Cellulose, NF/Ph.Eur (b) (4)							
Lactose Monohydrate, NF/Ph.Eur (b) (4)							
Collodial Silicon Dioxide, NF/ Ph.Eur							
Crospovidone, NF, (b) (4)							
Magnesium Stearate, NF/ Ph.Eur							
Purified Water, USP/ Ph.Eur (b) (4)							
Total							

* The strength used for the BA/BE studies

** The formulations are fully proportional

⁵ DARRTS, NDA 207098, CHIDAMBARAM, NALLAPERUM 10/12/2004 REV-QUALITY-03(General Review) Archive

Are the amounts of all inactive ingredients based on Maximum Daily Dose (MDD) within IIG (per unit) limits?	YES
If no, are they all above/within IIG (per day) limits?	YES
Are all color additives and elemental iron within limits specified by CFR (if applicable) or less than 0.1% of the total unit weight (w/w)?	N/A
Are all strengths of the test product proportionally similar per the BA/BE guidance criteria?	YES

Reviewer's Comments:

- The formulations of 2 mg, 4 mg, 6 mg, 8 mg, 10 mg, and 12 mg are proportionally similar to the 1 mg test product which underwent BE testing.
- The formulations are adequate.

1.11 Dissolution Data (Applicable if there are waiver requests)

Dissolution Review Path	GDRP, ANDA-207098-ORIG-1, Biopharmaceutics Primary Review 207098D060214.doc Review Sam Chan 13-Jan-2015
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Table 24. Dissolution Data

5.1 Study # 2013-3306 (pilot fasted)

Dissolution Conditions		Apparatus:		USP 2 (paddles)									
		Speed of Rotation:		50 rpm									
		Medium:		0.1M HCl (b) (4)									
		Volume:		500 mL (b) (4)									
		Temperature:		37.0°C ± 0.5°C									
Firm's Proposed Specifications		NL T (b) (4) % (Q) of the labeled amount is dissolved in 30 min											
Dissolution Testing Site (Name, Address)		Taro Pharmaceutical Industries Ltd. 14 Hakitor Street Haifa Bay 2624761, Israel											
Study Ref No.	Testing Date	Product ID\Batch No. (Test - Manufacture Date) (Reference – Expiration Date)	Dosage Strength & Form	No. of Dosage Units		Collection Times (minutes or hours)						Study Report Location	
						5 min	10 min	15 min	30 min	45 min	60 min		
Study Report #:	August 13, 2013	Test Product – 781983 (Mfg date – July, 2013)	1 mg Tablet	12	Mean	83	87	95	97	98	99	Batch Analysis Section 3.2.P.5.4	
					Range	(b) (4)							
					%CV	13.05	13.01	3.42	2.04	1.41	1.33		
Study Report #:	August 13, 2013	Test Product – 781984 (Mfg date – July, 2013)	1 mg Tablet	12	Mean	102	102	102	103	103	103		
					Range	(b) (4)							
					%CV	2.51	1.32	1.21	1.11	1.05	1.17		
Study	August	Reference Product –	1 mg	12	Mean	98	98	98	99	99	99		

Report #:	18, 2013	GVSB (Exp date–April, 2014)	Tablet		Range	(b) (4)					
					%CV	4.64	1.47	1.08	0.91	1.04	1.07

5.2 Studies # PKD 13 459 & PKD 13 460 (pivotal fasted & fed)

Dissolution Conditions		Apparatus:		USP 2 (paddles)								
		Speed of Rotation:		50 rpm								
		Medium:		0.1M HCl (b) (4)								
		Volume:		500 mL (b) (4)								
		Temperature:		37.0°C ± 0.5°C								
Firm's Proposed Specifications		NL T (b) (4) % (Q) of the labeled amount is dissolved in 30 min										
Dissolution Testing Site (Name, Address)		Taro Pharmaceutical Industries Ltd. 14 Hakitor Street Haifa Bay 2624761, Israel										
Study Ref No.	Testing Date	Product ID \ Batch No. (Test - Manufacture Date) (Reference – Expiration Date)	Dosage Strength & Form	No. of Dosage Units		Collection Times (minutes or hours)						Study Report Location
						5 min	10 min	15 min	30 min	45 min	60 min	
Study Report #:	August 13, 2013	Test Product – 781984 (Mfg date – July, 2013)	1 mg Tablet	12	Mean	102	102	102	103	103	103	Batch Analysis Section 3.2.P.5.4
					Range	(b) (4)						
					%CV	2.51	1.32	1.21	1.11	1.05	1.17	
Study Report #:	August 18, 2013	Reference Product – GVSB (Exp date–April, 2014)	1 mg Tablet	12	Mean	98	98	98	99	99	99	
					Range	(b) (4)						
					%CV	4.64	1.47	1.08	0.91	1.04	1.07	

9 Pages have been withheld in full as b4 (CCI/TS) immediately following this page

Please comment on whether dissolution data are adequate to support waiver requests.	NO
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Overall Comment:

- The dissolution review is reviewed separately and the result is inadequate.¹
- Per dissolution review, the firm conducted dissolution testing using its own proposed method [500 ml 0.1 N HCl (b) (4) @ 37 ± 0.5°C, USP apparatus II (b) (4) at 50 rpm]. (b) (4)
 (b) (4) The firm was asked to conduct dissolution testing on twelve (12) dosage units of unexpired batches of each test and reference product using the FDA-recommended method [500 ml 0.1 N HCl @ 37.0 ± 0.5°C, USP apparatus II at 50 rpm].¹
- Given the dissolution data is not acceptable in the current application, the dissolution data are not adequate to support the waiver requests.

1.12 OSIS History

Clinical Site:

Sun Pharmaceutical Industries Ltd
 Clinical Pharmacology Unit,
 Sun Pharmaceutical Industries Ltd.
 Tandalja,
 Vadodara – 390 020 (India)
 Clinical period: 12/3/2013 – 12/24/2013

Application #	Inspection type	Inspection	Study Period	Outcome	relevant
NDA 204417	routine	(b) (4)	5/3/10 to 9/10/10	NAI	Yes
(b) (4)					
NDA 205583	routine	(b) (4)	5/28/2012 – 8/16/2012	VAI	Yes
ANDA 205078	routine	(b) (4)	9/5/12 – 9/17/12	NAI	Yes

Reviewer’s Comments:

- There is no pending inspection for this site.
- The outcome of the most recent relevant inspection is NAI.
- Based on evaluation of the submitted data, the OSI inspection of the clinical site for the current ANDA is not necessary. The studies submitted in the current ANDA do not indicate any conduct issues and no data integrity deficiencies were identified by the reviewer. The OSI inspection status for the current ANDA is considered complete at this time.

(b) (4)

(b) (4)

Application #	Inspection type	Inspection period	Study Period	Outcome	relevant
ANDA 202635	routine	(b) (4)	(b) (4)	NAI	No
ANDA 203263	routine			VAI	No
NDA 204417	routine			NAI	Yes
NDA 205583	routine			VAI	Yes

Reviewer’s Comments:

- There is no pending inspection for this site.
- The outcome of the most recent relevant inspection is VAI.

(b) (4)

DBIII Reviewer’s Comment:

The protocol deviations of the current BE studies do not contain any similar violation. Therefore, the finding is not applicable to current BE studies.

(b) (4)

OSIS Comments:

DBIII Reviewer's Comment:

There were no study sample reintegration reported in current BE studies. Therefore, the finding is not applicable to current BE studies.

- Based on evaluation of the submitted data, the OSI inspection of the analytical site for the current ANDA is not necessary. The studies submitted in the current ANDA do not indicate any conduct issues and no data integrity deficiencies were identified by the reviewer. The current ANDA reviewer determined that the findings of the OSI inspection identified for NDA 205583 are not expected to impact the BE study outcomes of the current ANDA. The OSI inspection status for the current ANDA is considered complete at this time.

1.13 Consult Reviews

N/A

1.14 Attachments

N/A

BIOEQUIVALENCE DEFICIENCIES TO BE PROVIDED TO THE APPLICANT

ANDA: 207098
APPLICANT: Taro Pharmaceutical U.S.A., Inc.
DRUG PRODUCT: Iloperidone Tablets
1 mg, 2 mg, 4 mg, 6 mg, 8 mg, 10 mg, and 12 mg

The Division of Bioequivalence has completed its review and has identified the following deficiencies:

1. Please provide the details of all adverse events (AEs) reported in the pilot study (2013-3306) including the severity/intensity of the AEs (i.e., mild, moderate, severe, serious etc.).
2. Your waiver requests for the 2 mg, 4 mg, 6 mg, 8 mg, 10 mg and 12 mg strengths are not considered at this time due to inadequate dissolution testing data for all strengths of the test and reference products. (b) (4)

Please submit additional dissolution testing data on twelve (12) dosage units of unexpired batches of each test and reference product using the following FDA-recommended method (with conventional USP dissolution vessels), to support the waiver requests of the lower strengths of the test product, as well to establish a regulatory dissolution method and specifications for quality control purposes.

Apparatus	II (paddle)
Speed of Rotation	50 rpm
Medium	0.1N HCl
Volume	500 mL
Recommended Sampling Times	5, 10, 15, 30, 45 and 60 minutes

3. If necessary, please develop a discriminating and reproducible dissolution method, using conventional USP apparatuses (b) (4) for the purpose of comparing dissolution profiles between strengths of the test and reference products in support of your waiver requests of the lower strengths.

The bioequivalence comments provided in this communication are comprehensive as of issuance. However, these comments are subject to revision if additional concerns raised by chemistry, manufacturing and controls, microbiology, labeling, other scientific or regulatory issues or inspectional results arise in the future. Please be advised that these concerns may result in the need for additional bioequivalence information and/or studies, or may result in a conclusion that the proposed formulation is not approvable.

Sincerely yours,

{See appended electronic signature page}

Hoainhon N. Caramenico, M.S., M.S.
Acting Director, Division of Bioequivalence III
Office of Bioequivalence
Office of Generic Drugs
Center for Drug Evaluation and Research

1.15 Outcome Page

ANDA: 207098

Reviewer: Chang, Yang

Date Completed:

Verifier: ,

Date Verified:

Division: Division of Bioequivalence

Description:

Productivity:

<i>ID</i>	<i>Letter Date</i>	<i>Productivity Category</i>	<i>Sub Category</i>	<i>Productivity</i>	<i>Subtotal</i>
25793	6/2/2014	Bioequivalence Study (REGULAR)	Fasting Study	1	1
25793	6/2/2014	Bioequivalence Study (REGULAR)	Fed Study	1	1
25793	6/2/2014	Bioequivalence Study (REGULAR)	Fasting Study	1	1
25793	6/2/2014	Other (REGULAR)	Dissolution-Based Waiver	1	1
25793	6/2/2014	Other (REGULAR)	Dissolution-Based Waiver	1	1
25793	6/2/2014	Other (REGULAR)	Dissolution-Based Waiver	1	1
25793	6/2/2014	Other (REGULAR)	Dissolution-Based Waiver	1	1
25793	6/2/2014	Other (REGULAR)	Dissolution-Based Waiver	1	1
25793	6/2/2014	Quality Assessment	Quality	4	4
				Total:	15

DIVISION OF BIOEQUIVALENCE DISSOLUTION REVIEW

ANDA No.	207098
Drug Product Name	Iloperidone Tablets
Strength (s)	1 mg, 2 mg, 4 mg, 6 mg, 8 mg, 10 mg, 12 mg
Applicant Name	Taro Pharmaceutical Industries Ltd.
Applicant Address	14 Hakitor Street, Haifa Bay, Israel, 2624761
US Agent Name and the mailing address	Taro Pharmaceuticals U.S.A. Inc. (Kavita Srivastava, Executive Director, Regulatory Affairs), 3 Skyline Drive, Hawthorne, NY 10532
US Agent's Telephone Number	914-345-9001 (b) (6)
US Agent's Fax Number	914-593-0078
Original Submission Date(s)	06/02/2014
Submission Date(s) of Amendment(s) Under Review	
Reviewer	Sam Chan
Dissolution Method	INADEQUATE
OVERALL REVIEW RESULT	INADEQUATE

I. EXECUTIVE SUMMARY

This is a review of the dissolution testing data only.

There is no USP method, but there is an FDA-recommended dissolution method for Iloperidone Tablets. The firm conducted dissolution testing using its own proposed method (500 ml 0.1 N HCl (b) (4) @ 37 ± 0.5°C, USP apparatus II (b) (4) at 50 rpm) only. (b) (4)

The testing compared the applicant's Iloperidone Tablets, (1 mg, 2 mg, 4 mg, 6 mg, 8 mg, 10 mg, 12 mg), to (b) (4) Fanapt® (iloperidone) tablets, (1 mg, 2 mg, 4 mg, 6 mg, 8 mg, 10 mg, 12 mg).

The firm should conduct dissolution testing on twelve (12) dosage units of unexpired batches of each test and reference product using the following FDA-recommended method:

500 ml 0.1 N HCl @ 37.0 ± 0.5°C, USP apparatus II at 50 rpm.

In addition there are deficiencies related to dissolution method effective date, and BE Summary Table 5.

The dissolution testing conducted is **incomplete**.

II. DISSOLUTION REVIEW

II.1 Submission Content Checklist

Information	YES	NO	N/A
Is there a posted dissolution method on the FDA website?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Did the firm use the above method?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Is there a USP dissolution method?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Did the firm use the USP dissolution method?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Did the firm use 12 units of both test and reference in dissolution testing?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Did the firm provide complete dissolution data (all raw data, range, mean, % CV, dates of dissolution testing)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Did the firm conduct dissolution testing with its own proposed method?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Did the firm submit dissolution method validation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

II.2 Dissolution Method As Posted on the FDA Website (if any)

Drug Name	Dosage Form	USP Apparatus	Speed (RPMs)	Medium	Volume (mL)	Recommended Sampling Times (minutes)	Date Updated
Iloperidone	Tablet	II (Paddle)	50	0.1 N HCl	500	5, 10, 15, 30, 45 and 60	08/05/2010

II.3 USP Method (if any)

II.4 Summary of In Vitro Dissolution Data

Provide dissolution data for all strengths (test and reference).

Dissolution Conditions		Apparatus:	USP 2 (paddles)									
		Speed of Rotation:	50 rpm									
		Medium:	0.1M HCl (b) (4)									
		Volume:	500 mL (b) (4)									
		Temperature:	37.0°C ± 0.5°C									
Firm's Proposed Specifications		NL T (b) (4) % (Q) of the labeled amount is dissolved in 30 min										
Dissolution Testing Site (Name, Address)		Taro Pharmaceutical Industries Ltd. 14 Hakitor Street Haifa Bay 2624761, Israel										
Study Ref No.	Testing Date	Product ID \ Batch No. (Test - Manufacture Date) (Reference – Expiration Date)	Dosage Strength & Form	No. of Dosage Units		Collection Times (minutes or hours)						Study Report Location
						5 min	10 min	15 min	30 min	45 min	60 min	
Study Report #:	August 13, 2013	Test Product – 781984 (Mfg date – July, 2013)	1 mg Tablet	12	Mean	102	102	102	103	103	103	Batch Analysis Section 3.2.P.5.4
					Range	(b) (4)						
					%CV	2.51	1.32	1.21	1.11	1.05	1.17	
Study Report #:	August 18, 2013	Reference Product – GVSF (Exp date–April, 2014)	1 mg Tablet	12	Mean	98	98	98	99	99	99	(b) (4)
					Range	(b) (4)						
					%CV	4.64	1.47	1.08	0.91	1.04	1.07	

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Dissolution Method SOP effective at the time of testing (Yes/No)	No (May 19, 2014)
Were the drug product units pooled during the dissolution testing (Yes/No)?	No
Was the dissolution testing conducted on the bio-batch?	Yes
Age of the test product at the time of dissolution testing.	N/A (Only provide month of manufacturer)
Was the reference product expired at the time of dissolution testing (Yes/No)	No
Comments on the variability of the dissolution data	The variability of the data is adequate
For two-stage dissolution testing, comment on the method of medium change from acid stage to buffer stage.	N/A

III. Reviewer's Comments for Dissolution Testing

1. There is no USP method, but there is an FDA-recommended dissolution method for Iloperidone Tablets. The firm conducted dissolution testing using its own proposed method (500 ml 0.1 N HCl ^{(b)(4)} @ $37 \pm 0.5^\circ\text{C}$, USP apparatus II ^{(b)(4)} at 50 rpm) only. ^{(b)(4)}
2. The testing compared the applicant's Iloperidone Tablets, (1 mg, 2 mg, 4 mg, 6 mg, 8 mg, 10 mg, 12 mg), to ^{(b)(4)} Fanapt[®] (iloperidone) tablets, (1 mg, 2 mg, 4 mg, 6 mg, 8 mg, 10 mg, 12 mg).
3. The firm should conduct dissolution testing on twelve (12) dosage units of unexpired batches of each test and reference product using the following FDA-recommended method:
500 ml 0.1 N HCl @ $37.0 \pm 0.5^\circ\text{C}$, USP apparatus II at 50 rpm.
4. The Bioequivalence (BE) Summary Table 5 for 2 mg, 4 mg, 6 mg, 8 mg, 10 mg, and 12 mg for the dissolution data could not be located in the submission. The firm should provide Bioequivalence (BE) Summary Table 5, for the dissolution data of all the strengths.
5. The dissolution method was not in effect at the time of dissolution testing. The firm reported using the Analytical Method (SOP) (Taro Research Institute ^{(b)(4)} for conducting dissolution testing. All the reported dissolution testing was conducted prior to the effective date: May 19, 2014. For future submissions, the firm will be requested to submit dissolution data using an effective method.

IV. Deficiency Comment for Dissolution Testing

1. The dissolution testing is incomplete. The firm conducted dissolution testing using its own proposed method (500 ml 0.1 N HCl ^{(b)(4)} @ $37 \pm 0.5^\circ\text{C}$, USP apparatus II ^{(b)(4)} at 50 rpm) only.
2. The firm should conduct dissolution testing on twelve (12) dosage units of unexpired batches of each test and reference product using the following FDA-recommended method:
500 ml 0.1 N HCl @ $37.0 \pm 0.5^\circ\text{C}$, USP apparatus II at 50 rpm.
3. The Bioequivalence (BE) Summary Table 5 for 2 mg, 4 mg, 6 mg, 8 mg, 10 mg, and 12 mg for the dissolution data could not be located in the submission. The firm should provide Bioequivalence (BE) Summary Table 5, for the dissolution data of all the strengths.

4. The dissolution method was not in effect at the time of dissolution testing. The firm reported using the Analytical Method (SOP) (Taro Research Institute [REDACTED]^{(b) (4)}) for conducting dissolution testing. All the reported dissolution testing was conducted prior to the effective date: May 19, 2014. For future submissions, the firm will be requested to submit dissolution data using an effective method in place.

V. Dissolution Recommendations

The in vitro dissolution testing conducted by Taro Pharmaceutical Industries Ltd. on its test product, Iloperidone Tablets, 1 mg (lot# 781984), 2 mg (lot# 782085), 4 mg (lot# 782086), 6 mg (lot# 782087), 8 mg (lot# 782088), 10 mg (lot# 782089) and 20 mg (lot# 782090) comparing it to [REDACTED]^{(b) (4)} Fanapt[®] (iloperidone) tablets, 1 mg (lot# GVSB), 2 mg (lot# KZDD), 4 mg (lot# KWDX), 6 mg (lot# KKTB), 8 mg (lot# KZDK), 10 mg (lot# MGSC) and 20 mg (lot# MDGD), respectively, is **inadequate** due to the deficiencies cited above.

BIOEQUIVALENCE DEFICIENCIES TO BE PROVIDED TO THE APPLICANT
(PROCESSED BY BIO-PM)

ANDA: 207098

APPLICANT: Taro Pharmaceutical Industries Ltd.

DRUG PRODUCT: Iloperidone Tablets, 1 mg, 2 mg, 4 mg, 6 mg, 8 mg, 10 mg,
and 12 mg

The Division of Bioequivalence (DB) has completed its review of the dissolution testing portion of your submission(s) acknowledged on the cover sheet. DB will review the bioequivalence studies and waiver requests later. The following deficiencies have been identified:

1. Your dissolution testing is not acceptable. (b) (4)

Please conduct dissolution testing on twelve (12) dosage units of unexpired batches of each test and reference product using the following FDA-recommended method:

USP Apparatus	II (paddle)
Rotation speed	50 rpm
Medium	0.1 N HCl
Volume	500 ml
Temperature	37.0 ± 0.5°C
Sampling Times	5, 10, 15, 30, 45 and 60 minutes

2. The Bioequivalence (BE) Summary Table 5 for 2 mg, 4 mg, 6 mg, 8 mg, 10 mg, and 12 mg strengths, for the dissolution data could not be located in the submission. Please submit Bioequivalence (BE) Summary Table 5, for the dissolution data of all the strengths.
3. The dissolution method was not in effect at the time of dissolution testing. You reported using the Analytical Method (Taro Research Institute (b) (4) for conducting dissolution testing. All the reported dissolution testing was conducted prior to the effective date: May 19, 2014. For future submissions, please submit dissolution data using an effective method.

Sincerely yours,

{See appended electronic signature page}

Ethan M. Stier, Ph.D., R.Ph.
Director
Division of Bioequivalence II
Office of Generic Drugs
Center for Drug Evaluation and Research

VI. OUTCOME

Enter Review Productivity and Generate Report

<http://cdsogd1/bioprod>