## FDA U.S. FOOD \& DRUG

# Prediction of Human Pharmacokinetics Utilizing In Vitro Chewing Method and Physiologically Based Pharmacokinetic (PBPK) Analyses for Abuse-Deterrent Hydrocodone Bitartrate Extended Release Tablets 

Workshop: Current State and Future Expectations of Translational Modeling Strategies to Support Drug Product Development, Manufacturing Changes and Controls

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## Disclaimer

This presentation reflects the views of the author and should not be construed to represent FDA's views or policies.

## 1. Background

A. Opioid Crisis
B. Abuse Deterrent Formulation (ADF)
2. Case Study: Hydrocodone Extended Release Tablets
A. In Vivo Chewing and Dissolution method
B. Application of PBPK model to predict in vivo behavior of impact of different types of physical manipulation e.g., crushing, chewing or administered as intact tablet
C. Product-Specific Guidance
D. Potential Application

## Drug Overdose Deaths by State, US 2017



O 6.9 to 11.0

- 13.6 to 16.0
- 18.6 to 21.0

O 11.1 to 13.5

- 16.1 to 18.5
- 21.1 to 57.0
- Drug overdose deaths continue to increase in the United States.
- From 1999 to 2017, more than 702,000 people have died from a drug overdose.
- Serious public health issue.


## Abuse Deterrent Formulation

- Deterrence to abuse potential achieved via several mechanisms e.g., physical/chemical barrier, agonist/antagonist, prodrug etc.
- Development of abuse deterrent formulation is one of several steps to fight this epidemic.
- FDA approved several abuse deterrent opioid formulations.


## Opioid ADF Approvals

| NDA \# | API | Trade Name | Approval date | Dosage Form | Labeling for Abuse <br> Deterrence |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 022272 | Oxycodone | OxyContin | $04 / 05 / 10$ | ER Tablet | IV, IN |
| 022321 | Morphine/Naltrexone | Embeda | $10 / 17 / 14$ | ER Capsule | IN, Oral (crushed) |
| 206627 | Hydrocodone | Hysingla ER | $11 / 20 / 14$ | ER Tablet | IV, IN, Oral (chewed) |
| 206544 | Morphine | MorphaBond ER | $10 / 02 / 15$ | ER Tablet | IV, IN |
| 208090 | Oxycodone | Xtampza ER | $04 / 26 / 16$ | ER Capsule | IV, IN |
| 208603 | Morphine | Arymo ER | $01 / 9 / 2017$ | ER Tablet | IV, IN |
| 209777 | Oxycodone | RoxyBond | $04 / 20 / 2017$ | Tablet | IV, IN |

IV: intravenous; IN: intranasal

## Abuse Deterrence via Chewing Route

- Chewing extended-release opioid tablets prior to ingestion is one of several methods used by drug abusers to disable the extended release mechanism of the tablet with the goal to achieve high opioid plasma concentrations (Cmax) within a short period of time (Tmax).
- Research project aimed at developing an in-vitro chewing method which can predict in-vivo opioid availability following chewing of opioid ER tablets.


# Development of an In Vivo Predictive Method for Determining Opioid Availability Following Chewing of Solid Oral Opioid Drug Products 

- Objective: To develop an in vitro chewing method which can predict in vivo opioid availability following chewing of opioid drug products.
- Impact:
- Can be a useful tool for generic/new ADF product development
- Can be recommended in product-specific guidance as an in vitro option in lieu of currently recommended in vivo chewing studies if the in vitro method can be sufficiently validated.


## Case study: Hydrocodone Bitartrate Extended Release Tablet

- Hydrocodone bitartrate ER tablet was recognized by FDA as having abusedeterrent properties that are expected to deter misuse and abuse via chewing.


Hydrocodone bitartrate 60 mg ER Tablets

# In Vitro Chewing Method for Determining Opioid Availability Following Chewing 



## In Vitro Release Results



# Mean Plasma Hydrocodone Concentration After Administration of Hydrocodone Solution and Intact, Crushed, Chewed and Intact form of Hydrocodone Bitartrate ER Tablet 



- Single-center, doubleblind, randomized, crossover study
- Non-dependent recreational drug users with moderate experience with opioids


## Model Development and Validation

## Hydrocodone Solution <br> 60 mg

PK parameters, permeability optimized


In vitro dissolution profile (intact tablet)
$+$
model of "Hydrocodone Solution"


In vitro dissolution profile
(milled tablet) $+$
model of "Hydrocodone Solution"



Hydrocodone Chewed Tablet 60 mg

In vitro dissolution profile (different gap sizes)
$+$
model of "Hydrocodone Solution"

## Model Development and Validation



## Product-Specific Guidance (PSG)

- FDA publishes PSGs to facilitate generic drug product availability and to assist the generic pharmaceutical industry with identifying the most appropriate methodology for developing drugs and generating evidence needed to support ANDA approval.
- PSGs describing the Agency's current thinking and expectations on how to develop generic drug products therapeutically equivalent ( $T E=P E+B E$ ) to specific reference listed drugs.
- For two products to be considered bioequivalent, there should be no significant difference in the rate and extent of absorption of the active moiety, which are usually measured by Cmax (the maximum drug concentration) and AUC (the area under the concentration-time curve), respectively.

Draft Guidance on Hydrocodone Bitartrate
This draft guidance, when finalized, will represent the current thinking of the Food and Drug Administration (FDA, or the Agency) on this topic. It does not establish any rights for any person and is not binding on FDA or the public. You can use an alternative approach if it satisfies the requirements of the applicable statutes and regulations. To discuss an alternative approach, contact the Office of Generic Drugs.

Active Ingredient:
Hydrocodone bitartrate
Dosage Form; Route:
Recommended Studies:
Tablet; extended release; oral

Two bioequivalence studies (1-2) and two in vivo comparative pharmacokinetic (PK) studies for abuse deterrence assessment (34)

1. Type of study: Fasting

Design: Single-dose, two-treatment, two-period crossover in vivo Strength: 20 mg
Subjects: Males and non-pregnant, non-lactating females, general population Additional Comments: Naltrexone or other opioid antagonist should be incorporated to block the pharmacodynamic (PD) effects of the opioid. The opioid antagonist should be administered well in advance of opioid dosing to achieve adequate blockade of opioid receptors. The most common approach is to administer 50 mg of naltrexone at the following times: (1) 12 hours prior to dosing; (2) at the time of study drug dosing; and (3) 12 hours after the last dose of study drug. Consult with a physician who is an expert in the administration of opioids for an appropriate dose of narcotic antagonist.
. Type of study: Fed
Design: Single-dose, two-treatment, two-period crossover in vivo Strength: 20 mg
Subjects: Males and non-pregnant, non-lactating females, general population Additional Comments: See comments in Study 1.
3. Type of study: Fasting, comparative oral PK study of chewed drug products Design: Single-dose, two-treatment, two-period crossover in vivo Strength: 60 mg
Subjects: Males and non-pregnant, non-lactating females, general population Additional Comments: See comments in Study 1. Patient-relevant chewing conditions that can discriminate between test and reference products' ability of deterring chewing should be identified. Determine relevant PK parameters including maximum concentration ( C under-the-curve $\left(\mathrm{AUC}_{0-4}\right.$ and $\mathrm{AUC}_{0-\infty}$ ), and time to maximum concentration ( T Applicants should submit partial AUCs (e.g., AUC $0-3$ hours and $\mathrm{AUC}_{0-4}$ hours) as supportive data.

Analytes to measure (in appropriate biological fluid): Hydrocodone in plasma
Bioequivalence based on ( $\mathbf{9 0 \%} \mathbf{C I}$ ): Hydrocodone
Abuse deterrence based on (upper 95\% confidence bound): Hydrocodone

## Fasting comparative oral PK study of chewed drug products.

In addition to Cmax, AUC, partial AUCs e.g., AUC0-3hours and AUC0-4 hours as supportive data.

## Virtual Comparative Oral Pharmacokinetic Study of Chewed Drug Products (TEST1/RLD)




| Cmax |  | AUC |  | pAUC 0-3 hour |  | pAUC 0-4 hour |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| GMR | Upper 95\% <br> Confidence Bound | GMR | Upper 95\% <br> Confidence Bound | GMR | Upper 95\% <br> Confidence Bound | GMR | Upper 95\% <br> Confidence Bound |
| 146.27 | 155.78 | 104.22 | 112.25 | 221.84 | 235.67 | 208.24 | 220.52 |

# Virtual Comparative Oral Pharmacokinetic Study of Chewed Drug Products (TEST2/RLD) 




| Cmax |  | AUC |  | pAUC 0-3 hour |  | pAUC 0-4 hour |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| GMR | Upper 95\% <br> Confidence Bound | GMR | Upper 95\% <br> Confidence Bound | GMR | Upper 95\% <br> Confidence Bound | GMR | Upper 95\% <br> Confidence <br> Bound |
| 98.69 | 105.75 | 96.20 | 106.48 | 62.42 | 66.76 | 65.45 | 69.78 |

## Potential Challenges/Future Direction

- Validation of in vitro chewing method in combination with PBPK model to discriminate comparative oral chewing PK study
- Formulation development/Clinical study: NIPTE/Biopharma


## Summary

- PBPK model for hydrocodone bitartrate ER tablet developed
- In vitro method of artificial chewing in combination with PBPK Modeling and Simulation can be helpful in predicting the in vivo behavior of hydrocodone bitartrate ER tablet after chewing followed by oral ingestion.
- Modeling \& Simulation provides an important tool to support new and generic drug development:
- Efficiency of clinical studies, test alternative scenarios


## Thank You!

- Model-Informed Drug Development Pilot Program (New Drug Development) https://www.fda.gov/drugs/development-resources/model-informed-drug-development-pilot-program
- For information about Model-Informed Drug Development Pilot Program (New Drug Development) please contact MIDD@fda.hhs.gov
- Alternative approaches to demonstrate bioequivalence: Applicants can submit their proposal through FDA's Pre-ANDA program.
- Pre-ANDA Program Information: https://www.fda.gov/Drugs/ResourcesForYou/Consumers/BuyingUsingMedicineSafely/Gen ericDrugs/ucm578012.htm
- For questions about submitting Pre-ANDA meeting requests for complex generic drug products online please contact PreANDAHelp@fda.hhs.gov


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