

# Potential Impact of Gastric pH on Generic Drug Bioequivalence Evaluation

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# Outline

- Background
- Risk factors for pH-related PK issue
- Bioequivalence consideration for generic drug product
- Case examples to illustrate Agency's efforts
- Additional issues
- Regulatory activities

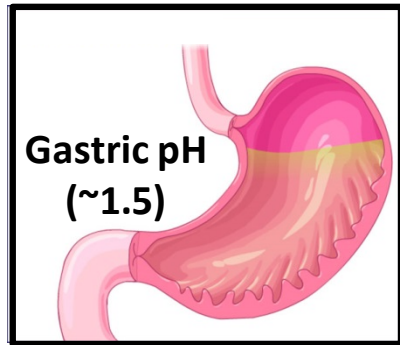
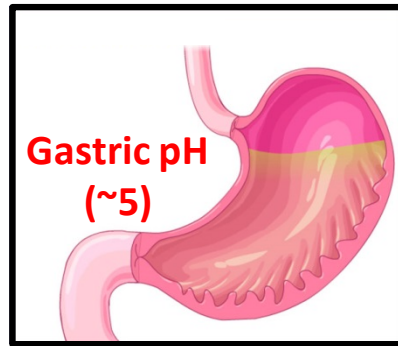
# Gastric pH and Drug Absorption



PPI, Antiacid, H<sub>2</sub> blockers

Disease, Age

Ethnicity



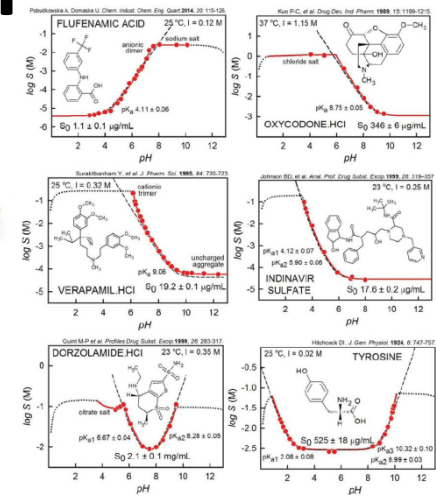
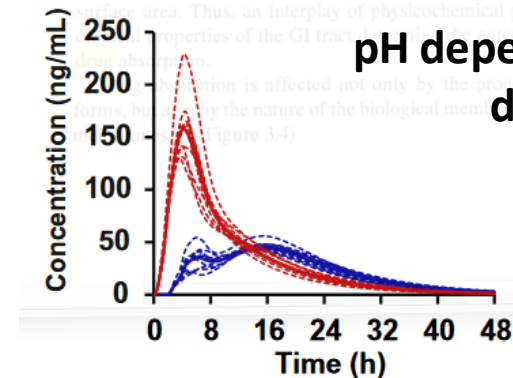
Drugs  
(pH dependent)



IR or pH Sensitive MR



Systemic Absorption



pH dependent release or dissolution

# Altered Absorption of the Drug May Occur When Gastric pH Changes



Observed in vivo DDI outcomes on **21 weak base** new drugs (IR) approved between 2003 to 2013

**For weak base drug:**  
 ↓ in exposure → efficacy concern

**For weak acid drug:**  
 ↑ in exposure → safety concern

Indication	Drugs	DDI
HIV	Rilpivirine	+
HIV	Atazanavir	+
HIV	Darunavir	-
Lung Cancer	Gefitinib	+
Lung Cancer	Erlotinib	+
Lung Cancer	Crizotinib	-
Liver cancer	Sorafenib	-
Renal cancer	Axitinib	+
Chronic myelogenous leukemia	Bosutinib	+
Chronic myeloid leukemia	Dasatinib	+
Acute coronary syndrome	Prasugrel	+
Reduce risk of stroke and systemic embolism	Dabigatran	+
Atrial fibrillation	Dronedarone	-
Erectile dysfunction	Vardenafil	Uncategorized
Erectile dysfunction	Tadalafil	+
Invasive Aspergillus and Candida infection	Posaconazole	+
Antibiotic	Telithromycin	Uncategorized
Pneumonia	Gemifloxacin	+
Hepatic impairment	Nilotinib	+
Type 2 diabetes	Saxagliptin	-
Musculoskeletal pain	Tapentadol	-

*“positive” was defined as >25% ↓ AUC & Cmax*

# Observed in vivo DDI Outcomes and Comment and Labeling Recommendation



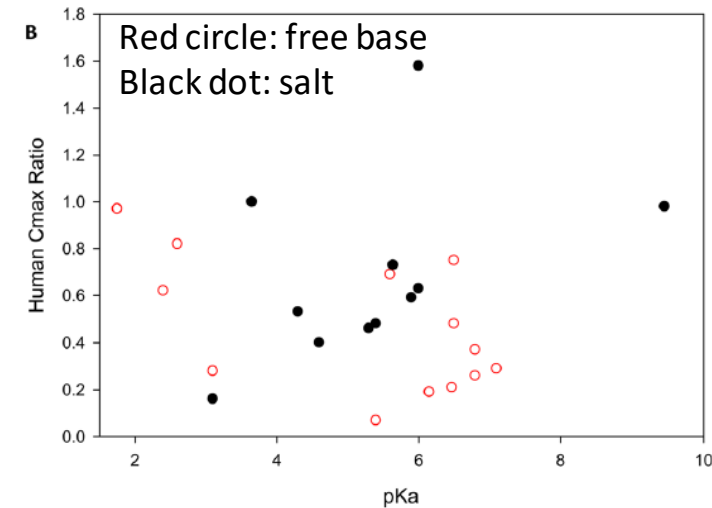
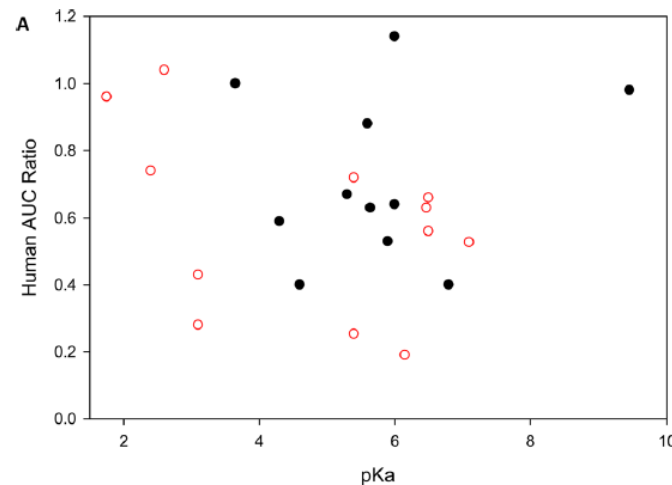
From efficacy and toxicity perspective,

Drug	ARA	Dosing regimen during treatment period (drug/ARA)	Timing of administration	Effect on victim drug's PK	Comment and labeling recommendation
Prasugrel	H <sub>2</sub> blocker: ranitidine	Multiple-dose drug + multiple-dose ranitidine (150 mg b.i.d.)	Concomitant	C <sub>max</sub> ↓14%; AUC ⇌	Prasugrel can be administered with drugs that elevate gastric pH, including PPIs and H <sub>2</sub> blockers <b>No PPI effect</b>
	PPI: lansoprazole	Single-dose drug + single-dose lansoprazole (30 mg)	Concomitant	C <sub>max</sub> ↓29%; AUC ⇌	
Dabigatran	H <sub>2</sub> blocker: ranitidine	Single-dose drug + multiple-dose ranitidine (150 mg q.d.)	Staggered: drug administered 10 h after H <sub>2</sub> blocker	C <sub>max</sub> ⇌; AUC ↑2%	No clinically meaningful change in drug exposure <b>No PPI effect</b>
	PPI: pantoprazole	Single-dose drug + multiple-dose pantoprazole (40 mg b.i.d.)	Concomitant	C <sub>max</sub> ↓40%; AUC ↓28%	
Erlotinib	H <sub>2</sub> blocker: ranitidine	Single-dose drug + ranitidine (300 mg q.d. or 150 mg b.i.d.)	Concomitant or staggered: drug administered 10 h after the previous ranitidine evening dose and 2 h before the morning dose	Concomitant administration: C <sub>max</sub> ↓54%; AUC ↓33%. Staggered administration: C <sub>max</sub> ↓17%; AUC ↓15%	Erlotinib must be taken 10 h after the H <sub>2</sub> -receptor antagonist dosing and at least 2 h before the next dose of H <sub>2</sub> -receptor antagonist <b>Partial PPI effect</b>
	PPI: omeprazole	Single-dose drug + omeprazole (40 mg q.d.)	Concomitant	C <sub>max</sub> ↓61%; AUC ↓46%	Avoid concomitant use with PPIs

# Is There a Predictive Correlation Between Key Physiochemical Properties of the Compounds and Their Clinical pH-effect?



- pKa
- log D at pH 7
- Molecular weight (MW)
- Melting point
- Intrinsic solubility
- Clinical dose
- Polar surface area (PSA)
- Freely rotatable bonds (FRB)
- Hydrogen donors
- Hydrogen acceptors



## Conclusion:

$$\text{AUC ratio} = \text{AUC}_{\text{cotreated}} / \text{AUC}_{\text{untreated}}$$

$$C_{\text{max}} \text{ ratio} = C_{\text{max-cotreated}} / C_{\text{max-untreated}}$$

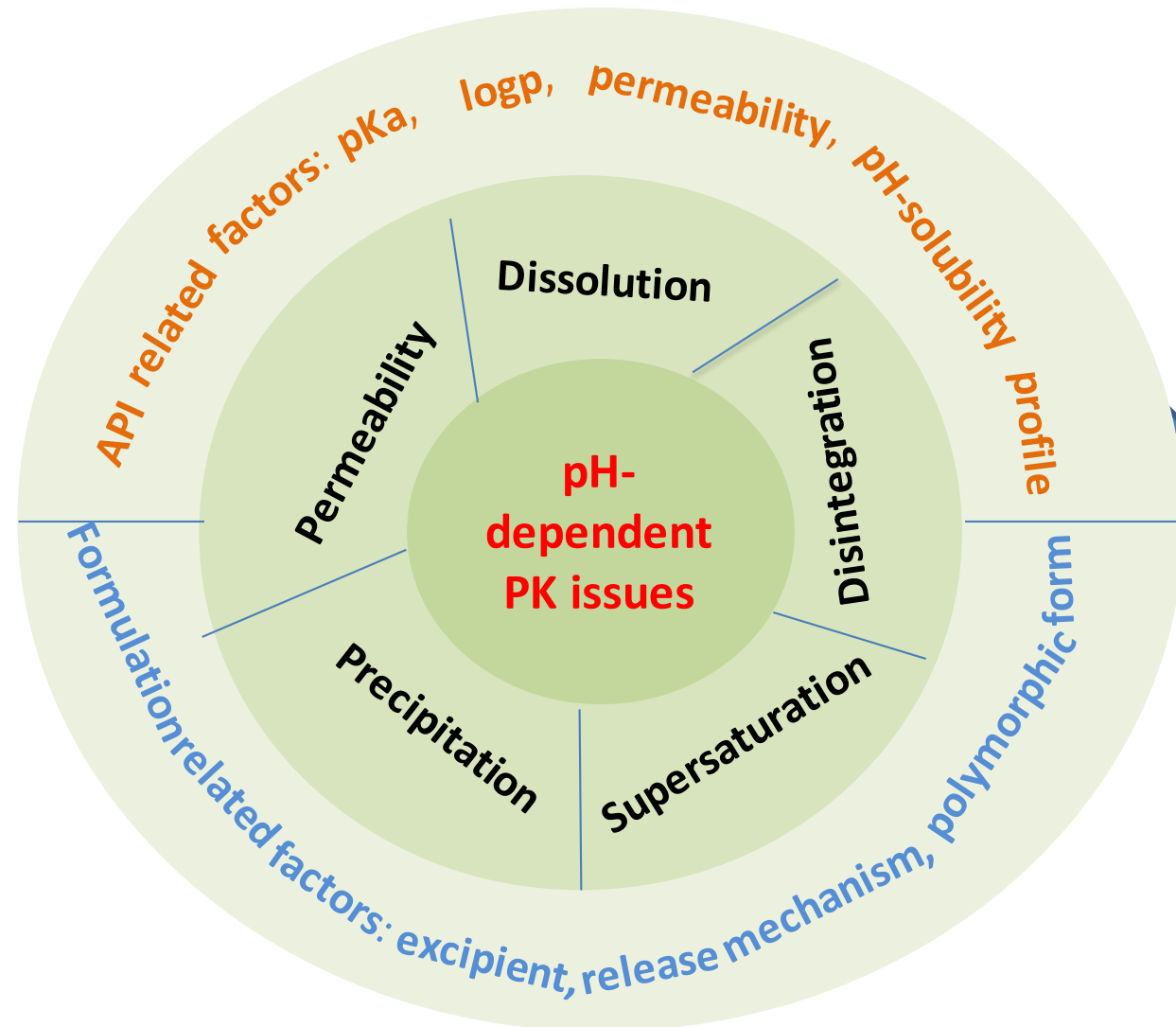
No significant linear correlation with any parameter or combination of parameters. While there may be a trend with respect to pKa, other related parameters can confound the analysis making simple correlations difficult.

**High risk factors:** free base, high dose, pKa range 3.5–6, low solubility at high pH

# Potential Impact on Generic Drug Development



pH-related PK issue is a function of several factors that control disintegration, dissolution, supersaturation, and precipitation





# Potential Impact on Generic Drug Development



Possible formulation-related factors which may cause pH-related PK issue:

- IR: different excipients, e.g. salt-base conversion
- IR: different polymorphic forms
- DR: different enteric polymers
- ER: different release mechanisms, e.g. osmotic pump vs hydrophilic matrix
- ER: different pH modifiers
- ER: different hydrophilic matrices
- ???

# How to Make Sure Generic Drugs' in vivo PK Performance is Similar to the Brand Drugs in Subjects with Elevated Stomach pH?



## Regulatory guidance:

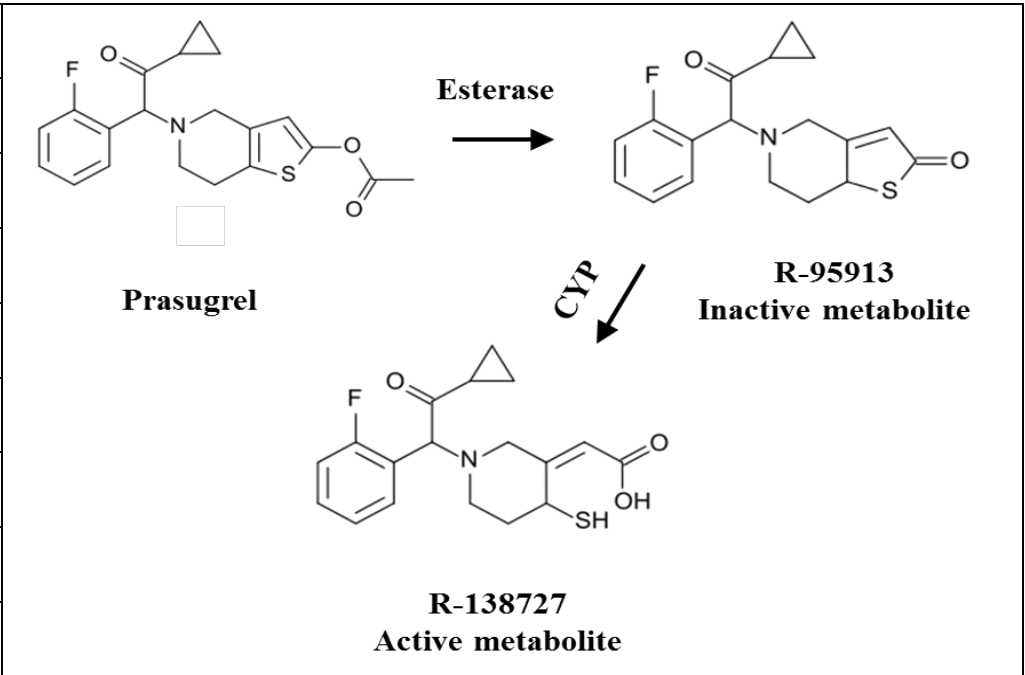
- ✓ Pharmaceutical equivalence
- ✓ In vitro dissolution study at different pHs (modified release)
- ✓ In vivo fast and fed BE PK studies in healthy subjects

## Research activities:

- ✓ In vitro two-stage dissolution study
- ✓ In vivo PPI PK study
- ✓ Biopredictive dissolution development
- ✓ Modeling and simulation

# Case Example A : Prasugrel (R vs T: different excipients)

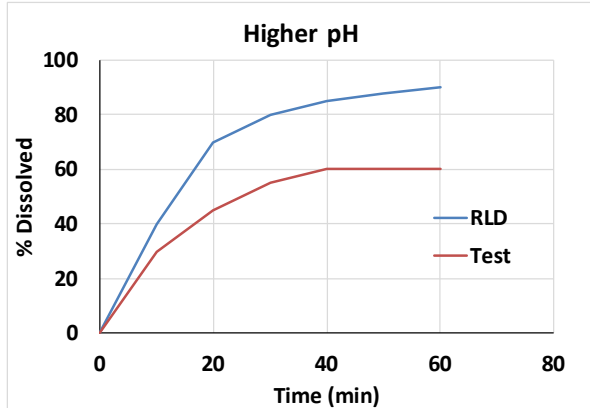
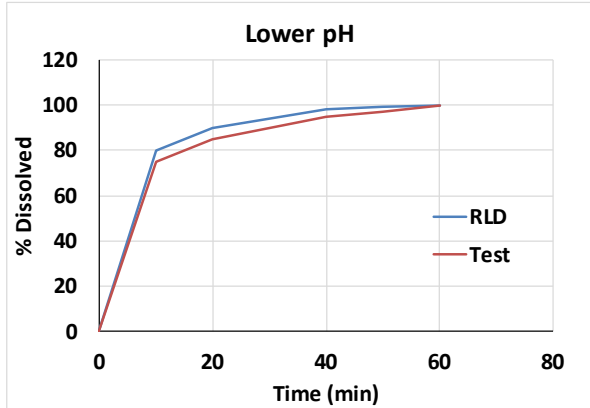
<b>Prasugrel -HCl</b>
BCS: Class II, Weak base
Log p: 3.55
pKa=5.1
pH- solubility: base/salt
pH 1: 28 / 78 mg/mL
pH 4.5: 0.035 / 0.32 mg/mL
pH 6.8: 0.01/0.07 mg/mL
Formulation: HCl salt, IR tablet



No PPI effect

Prasugrel	H <sub>2</sub> blocker: ranitidine	Multiple-dose drug + multiple-dose ranitidine (150 mg b.i.d.)	Concomitant	C <sub>max</sub> ↓14%; AUC ⇔	Prasugrel can be administered with drugs that elevate gastric pH, including PPIs and H <sub>2</sub> blockers
	PPI: lansoprazole	Single-dose drug + single-dose lansoprazole (30 mg)	Concomitant	C <sub>max</sub> ↓29%; AUC ⇔	

# Information we have for the test product:



Please note that the data here are not real dissolution data, but has been generated simply to illustrate the in vitro dissolution situation for prasugrel salt test product.

Fast BE study: test is BE to the RLD.

Fed BE study: test is BE to the RLD.

RLD +PPI:	H <sub>2</sub> blocker: ranitidine	Multiple-dose drug + multiple-dose ranitidine (150 mg b.i.d.)	Concomitant	C <sub>max</sub> ↓14%; AUC ⇔
	PPI: lansoprazole	Single-dose drug + single-dose lansoprazole (30 mg)	Concomitant	C <sub>max</sub> ↓29%; AUC ⇔

Question: Test +PPI?



# A Mechanistic Absorption Framework (ADAM model)

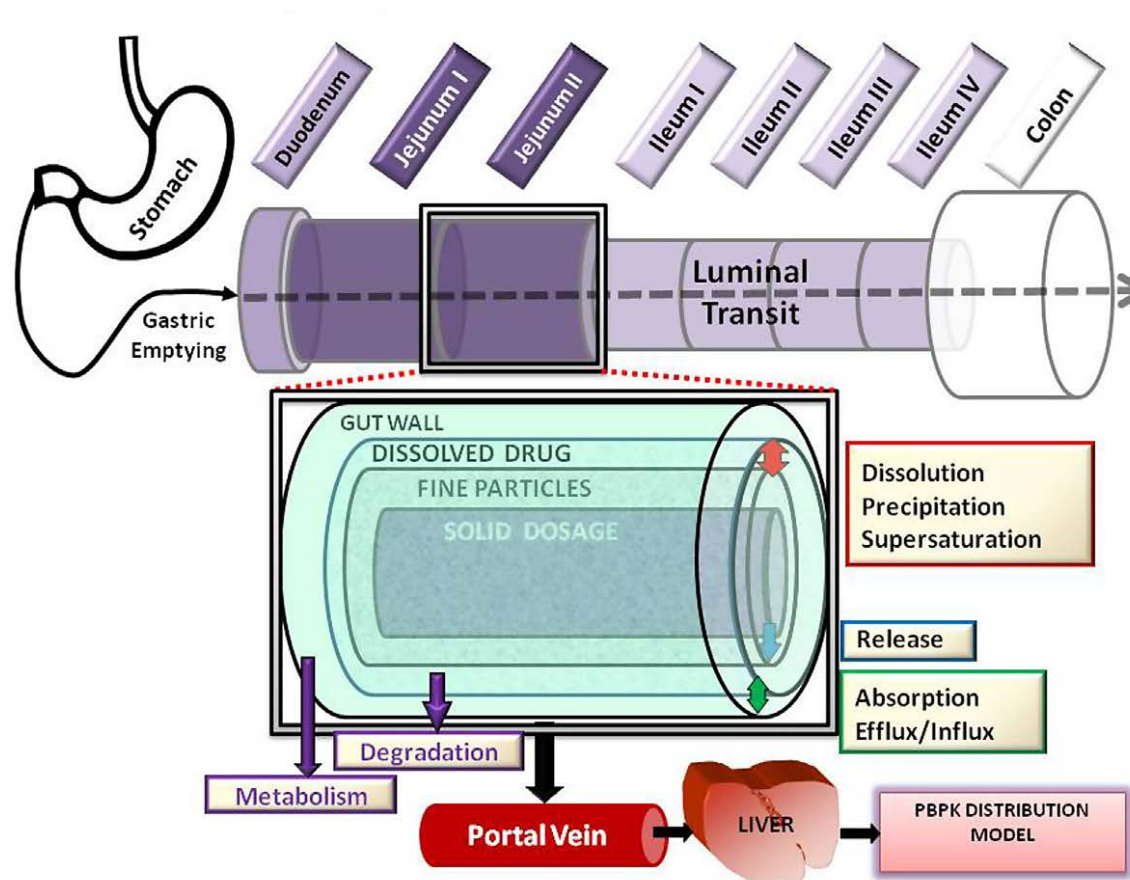
Mechanistic absorption model

- Dissolution
- Disintegration
- Supersaturation
- Precipitation
- Degradation

In vitro information



In vivo PK performance

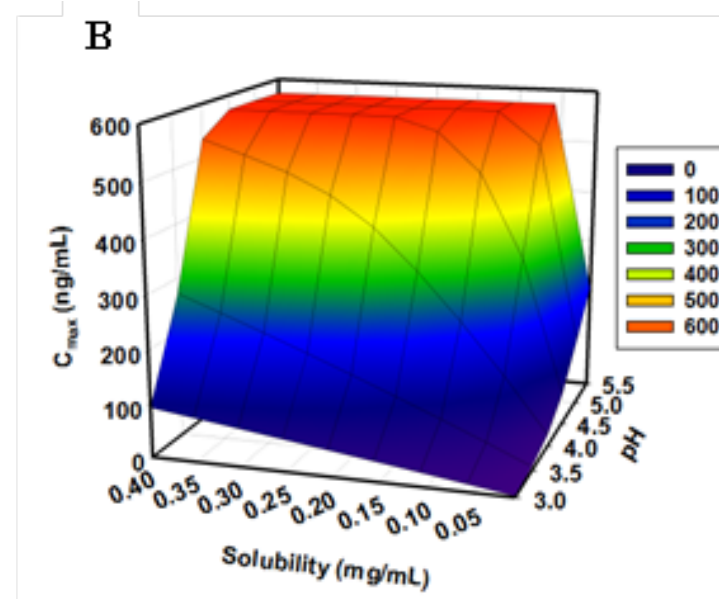
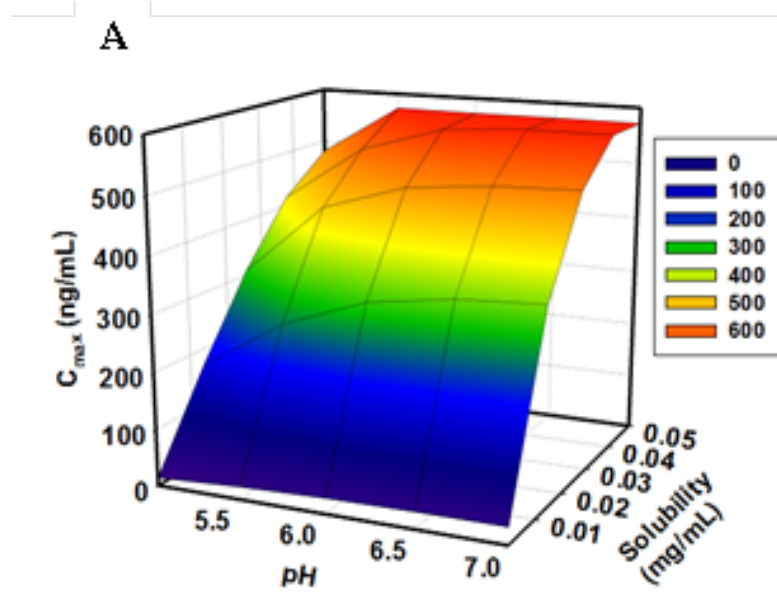


**Question 1:** Why test product has slower dissolution compared to the RLD?

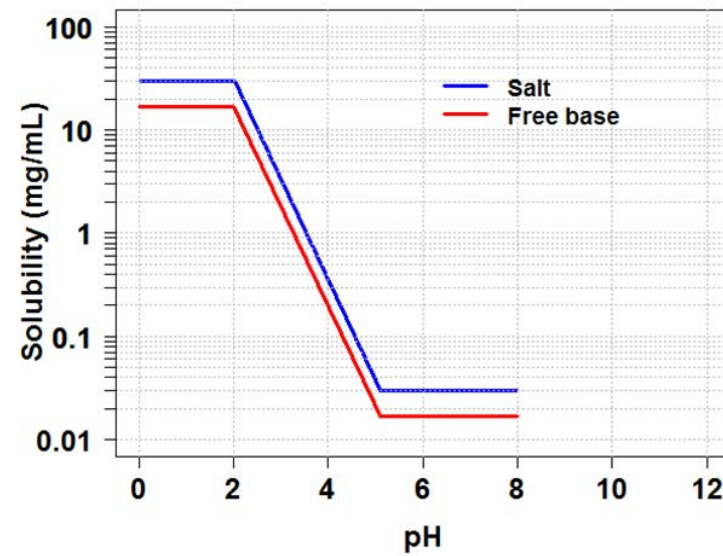
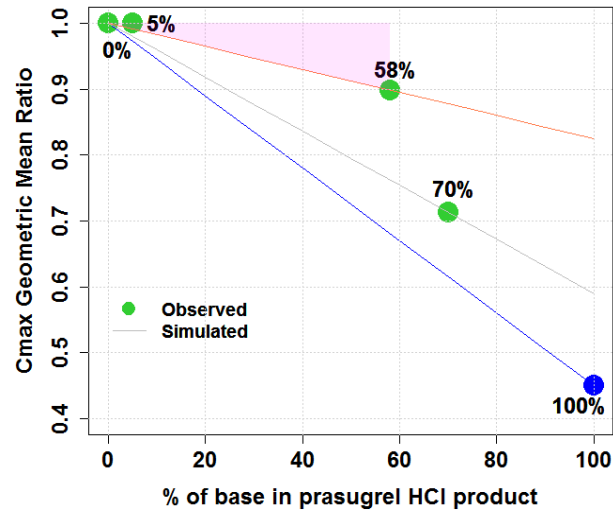
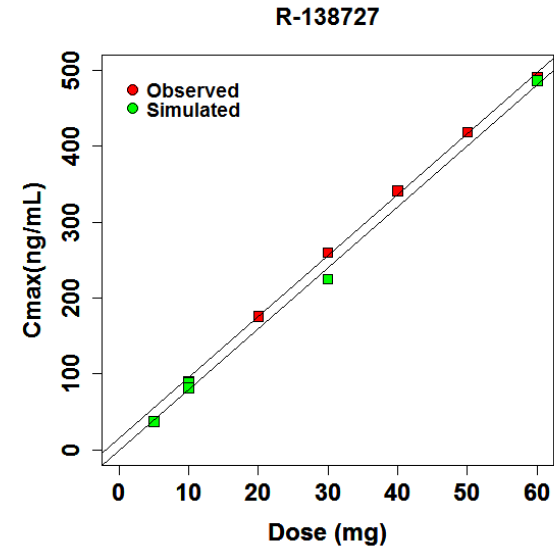
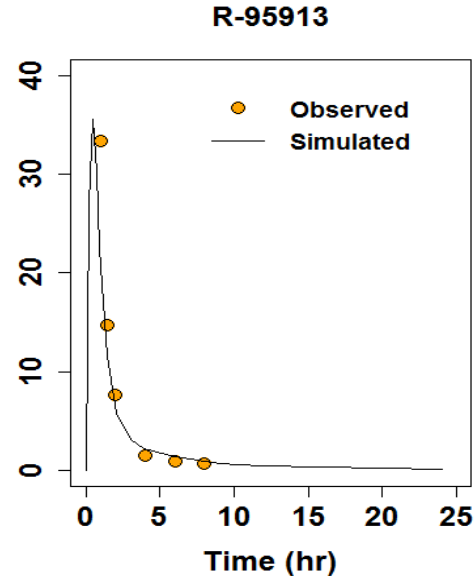
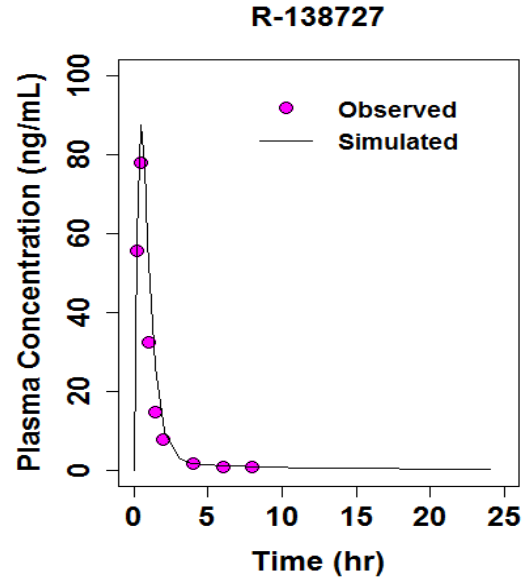
**Observation:** Conversion from salt to free base during storage or manufacturing (~40%)

**Question 2:** How much control over disproportionation % is needed to ensure bioavailability in subjects with elevated gastric pH?

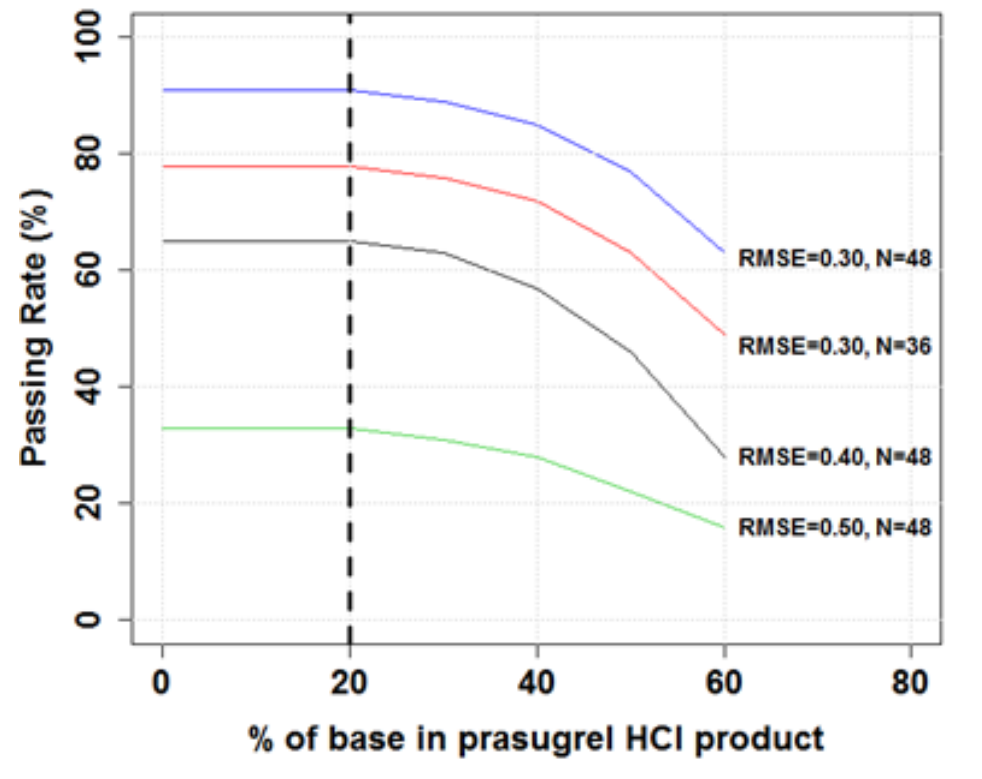
$C_{max}$  is Sensitive to the Solubility Values at pH 4.5 and Between pH 5 to 7



# In Vivo Intrinsic Solubility



# Effect of Extent of Conversion of Salt to Free Base on BE Evaluation



Less than 20% free base in prasugrel HCl product ensures in vivo BE of the generic product including in subjects that may be taking PPI



## Conclusions (Prasugrel HCl)

- Less than 20% free base in prasugrel HCl product ensures in vivo BE of the generic product including in subjects that may be taking PPI
- For BCS 2 and 4 immediate-release formulations, mechanism-based modeling could be challenging as in vitro solubility and dissolution might not be predictive.
- Multiple datasets with or without PPI are desired for model calibration and parameter estimation.

# Case Example B : Nifedipine ER (R&T: different release mechanism)

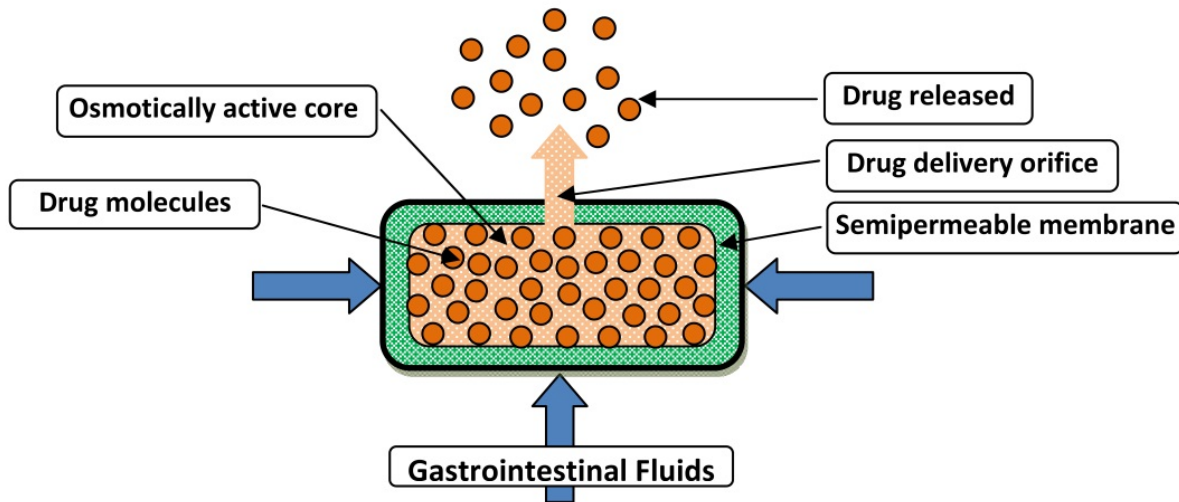
BCS class II

pKa=3.93, weak acid

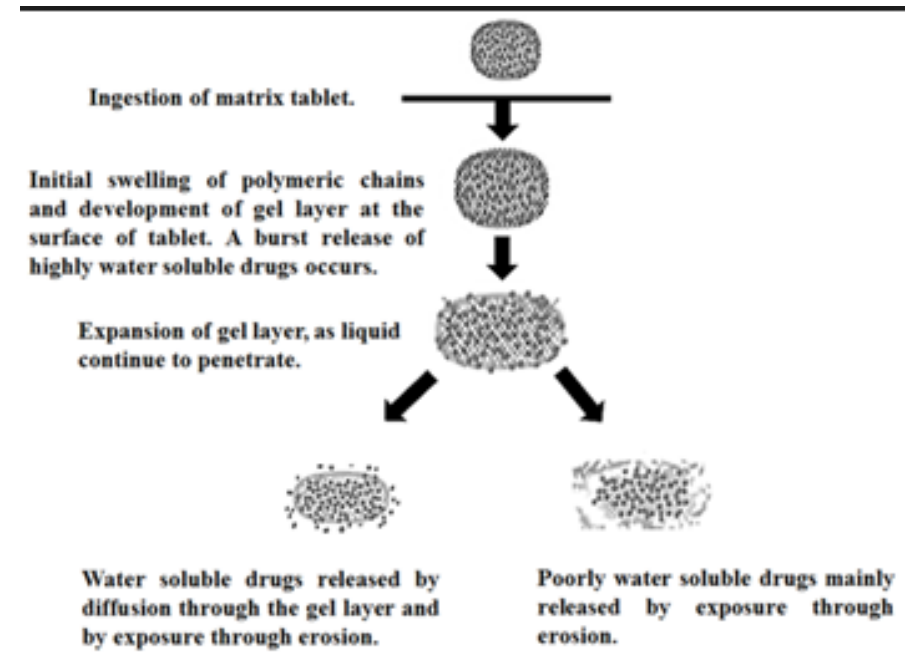
very low solubility across the physiological pH range

Reference: Adalat<sup>®</sup> OROS(Bayer AG, Leverkusen, Germany): **osmotic pump**

Test: CORAL<sup>®</sup> (D.R. Drug Research S.R.L., Milano, Italy) : **hydrophilic matrix**



**Osmotic pump**



**hydrophilic matrix**

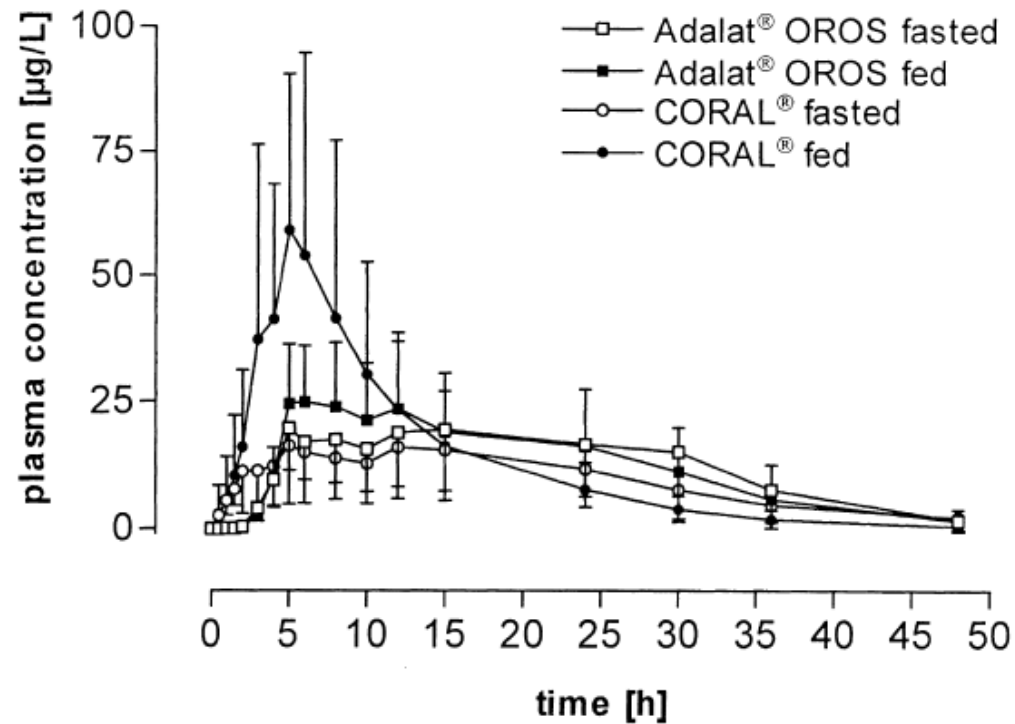
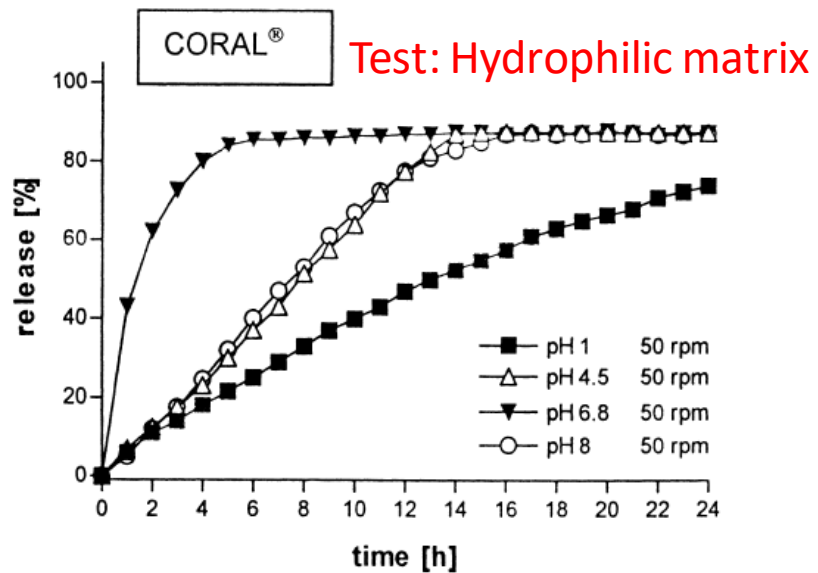
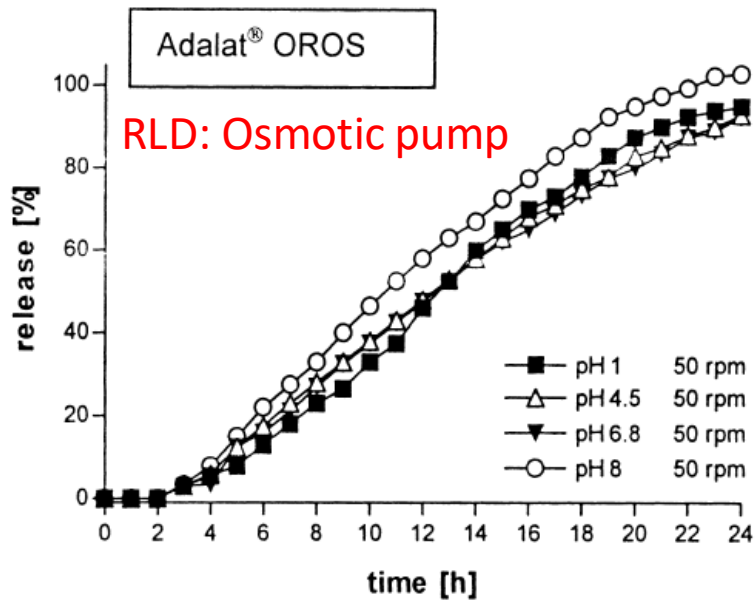
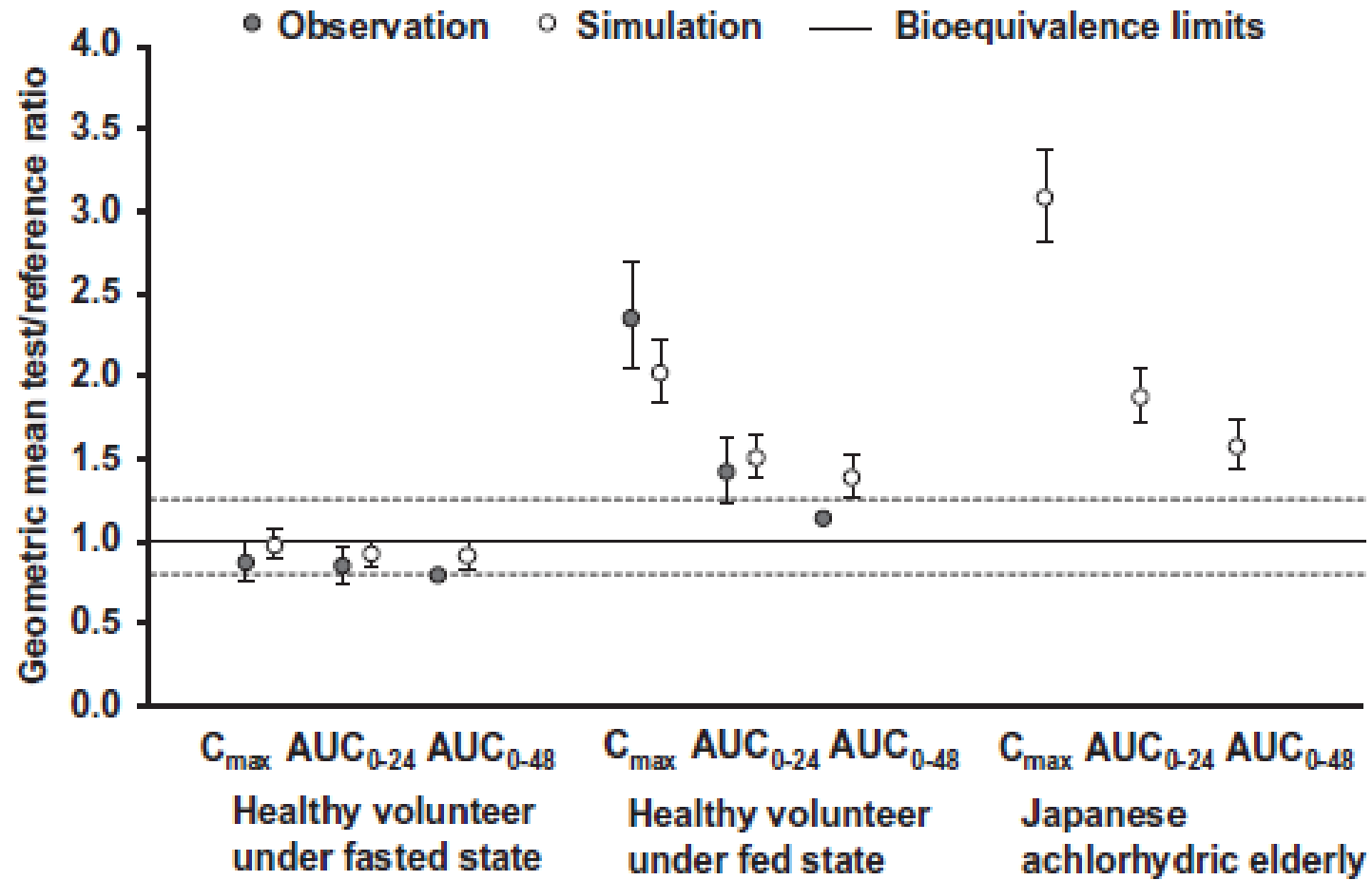


Fig. 1. Mean plasma concentration ( $\pm$ S.D.) vs. time curves of nifedipine determined after oral administration of Adalat® OROS and CORAL® under fasting conditions and after a high-fat breakfast in 24 healthy young volunteers in a four-period changeover design.

# pH dependent PK issue?



# Dose the Test Nifedipine Product Have PPI Effect?



## Regulatory activity:

Test: Nifedipine ER, 60 mg, **Hydrophilic matrix**

Reference: PROCARDIA XL extended-release tablet, 60 mg ( Pfizer, Inc.), **Osmotic pump**

1. **Clinical study (2017): Drug Interaction With Proton Pump Inhibitors for Nifedipine ER Tablets**
2. **In vitro dissolution study**
3. **PBPK modeling and simulation**

 U.S. National Library of Medicine

*ClinicalTrials.gov*

**Sponsor:**

Food and Drug Administration (FDA)

**Collaborator:**

BioPharma Services, Inc

**NCT 00768560**

## **Some additional issues we may need to consider:**

1. How much information obtained from the fed BE study in healthy subjects can be used to identify the potential pH-related PK issue?
2. Is the in vitro dissolution method in vivo predictive?
3. Is pH-related PK issue dissolution rate dependent or other kinetics dependent?

# How much information obtained from Fed BE study in healthy subjects can be used to identify the potential pH related PK issue?

**PPI interaction effect > Food effect**

Table 1. Physicochemical Properties of GDC-0941

BCS: Class II	
MDCK permeability (A to B): $10 \times 10^{-6}$ cm/s	
Formula weight: 513.6 (freebase)	
Log P: $3.22 \pm 0.22$	
pKa: 1.54 (basic), 4.24 (basic)	
Solid form: Crystalline salt	
pH-solubility:	
pH 1: 0.75 mg/mL	
pH 4.4: < 0.001 mg/mL	
Simulated gastric fluid (SGF, pH 1.2): 0.25 mg/mL	
Fasted state simulated intestinal fluid (FaSSIF, pH 6.8): < 0.001 mg/mL	
D:S ratio > 100L	

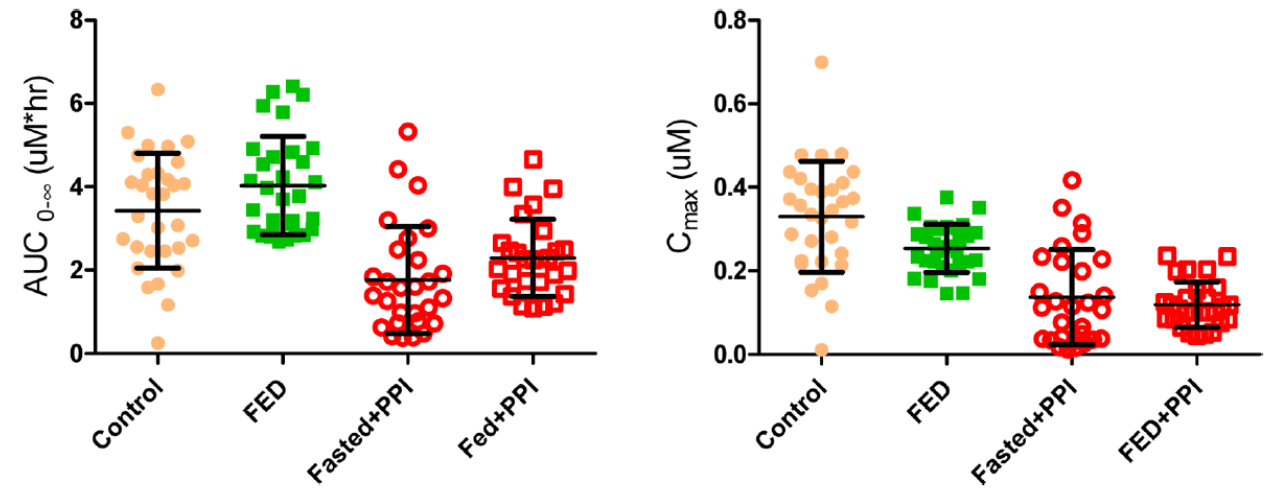
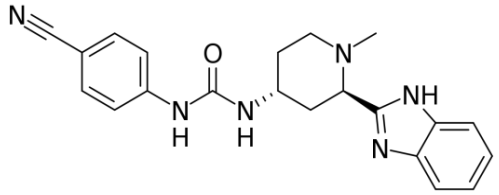
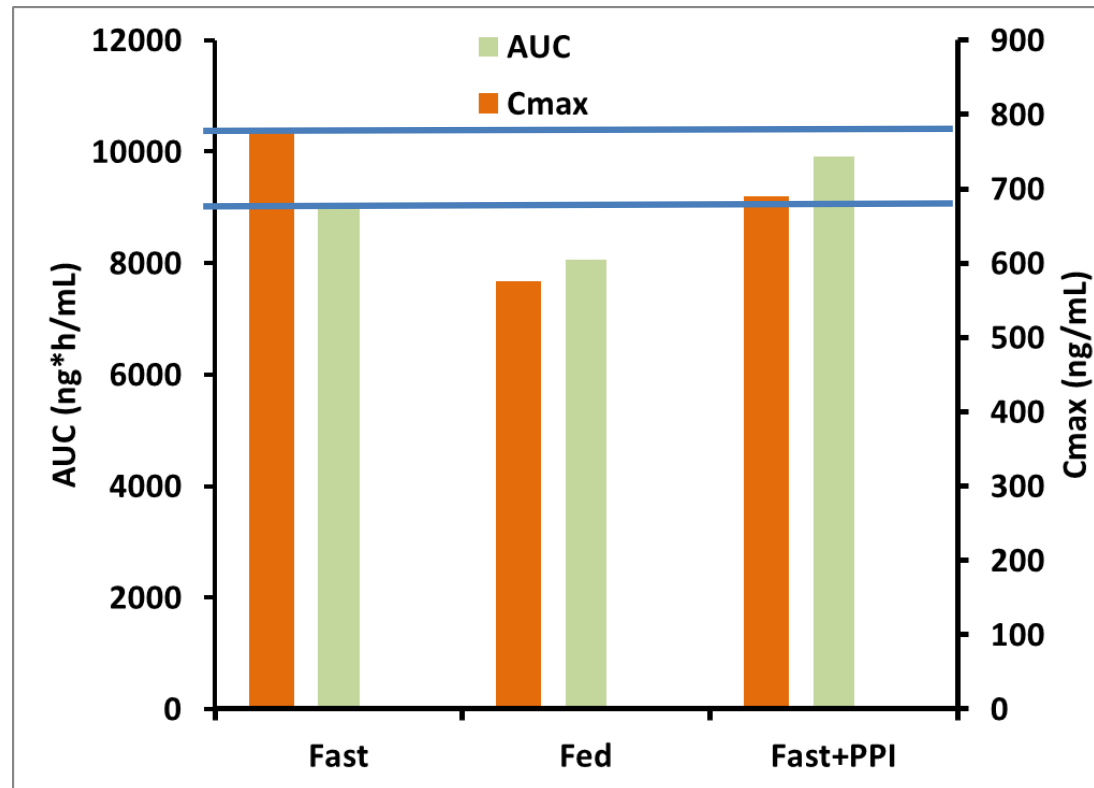


Figure 4. Individual GDC-0941 exposure after oral administration of 40 mg GDC-0941 under fasting, fed (high-fat meal), and hyopchlorhydric (PPI-altered pH) conditions.

# PPI interaction effect < Food Effect



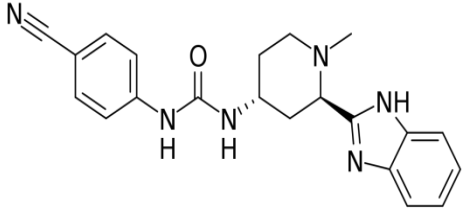
<b>Glasdegib</b>	
BCS: Class II, Weak base	
Log p: 2.28	
pKa=6.7 (basic)	
Waster solubility: 0.0469 mg/mL	
Formulation: maleate salt IR tablet	





# In vivo Predictive Dissolution Method?



<b>Pioglitazone-HCl</b>	
BCS: Class II, Weak base	
Log p: 2.3	
pKa=5.8 and 6.8 (basic)	
pH- solubility:	
pH 1.2: 4.4 mg/mL	
pH 3.0: 0.042 mg/mL	
pH 4.0: 0.005 mg/mL	
pH 5.0: 0.0005 mg/mL	
pH 6.8: 0.0003 mg/mL	
Formulation: maleate salt IR tablet	

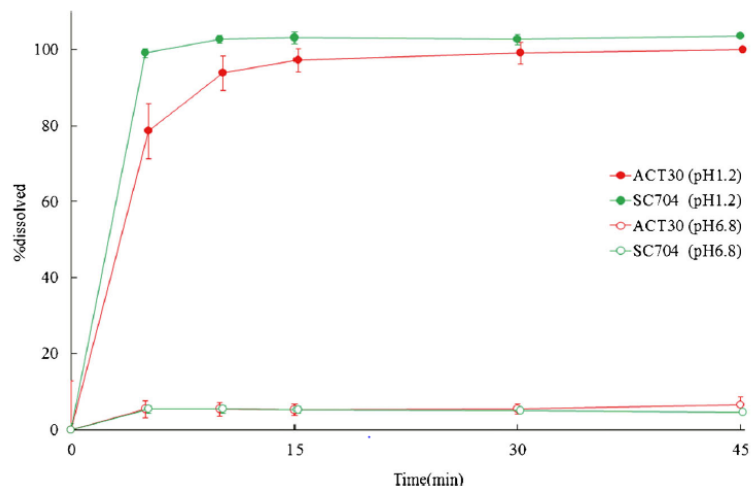


Fig. 1. Dissolved drug-time profiles with USP apparatus II dissolution test in JP1 medium (pH 1.2) and in JP2 medium (pH 6.8). Each data point represents mean±S.D. (n=12)

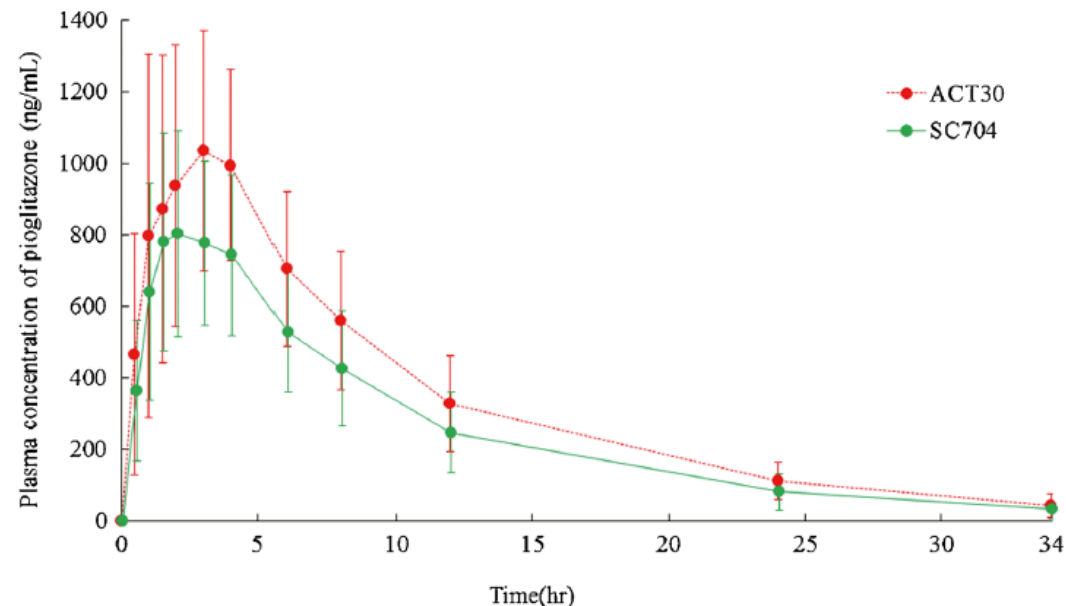


Fig. 2. Plasma concentration–time profiles of pioglitazone after an oral administration of a product in healthy male volunteers. Each data point represents mean±S.D. (n=20)

90% CI AUCt: 68.3-83.6%  
Cmax: 70.5-88.8%

# The amount of HPC in the oral formulation of pioglitazone-HCl affected the particle size distribution of precipitated pioglitazone and further affect the in vivo PK performance

## HPC : hydroxypropyl Cellulose

SC704: HPC/pioglitazone (w/w)=1/100

ACT30: HPC/pioglitazone (w/w)=10/100

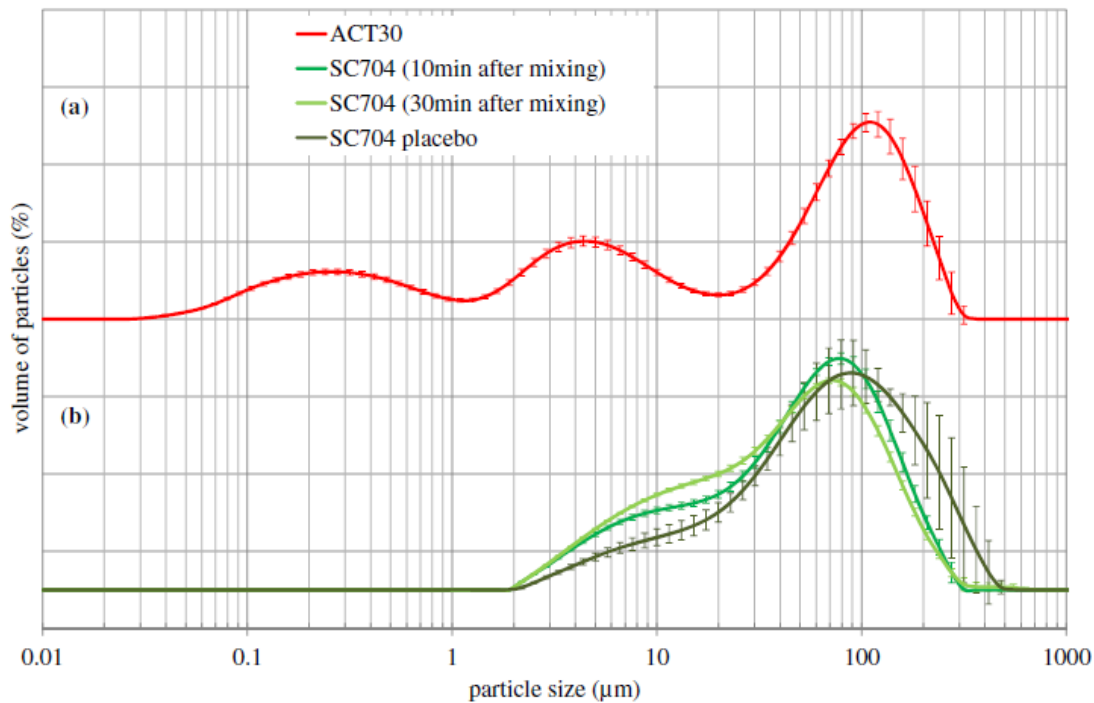


Fig. 3. The particle size distributions of the precipitated drug from ACT30 (a), SC704 and SC704 (placebo) (b). Each data line represents mean±S.D. (n=5)

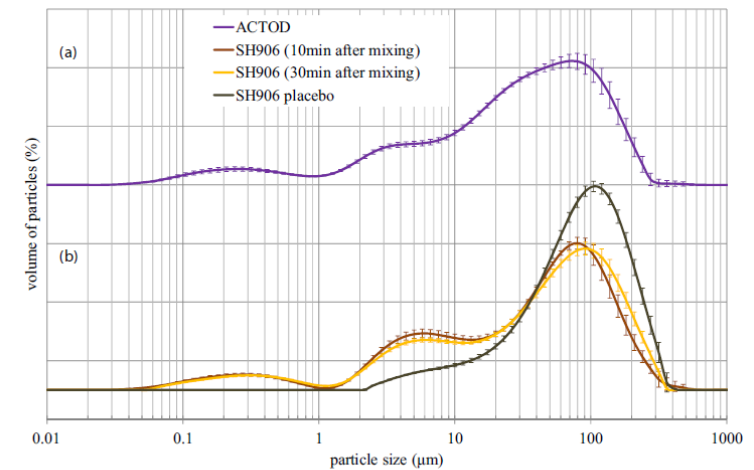


Fig. 7. The particle size distributions of the precipitated drug solutions of ACTOD30 (a), SH906 and SH906(placebo) (b). Each data line represents mean±S.D. (n=5)

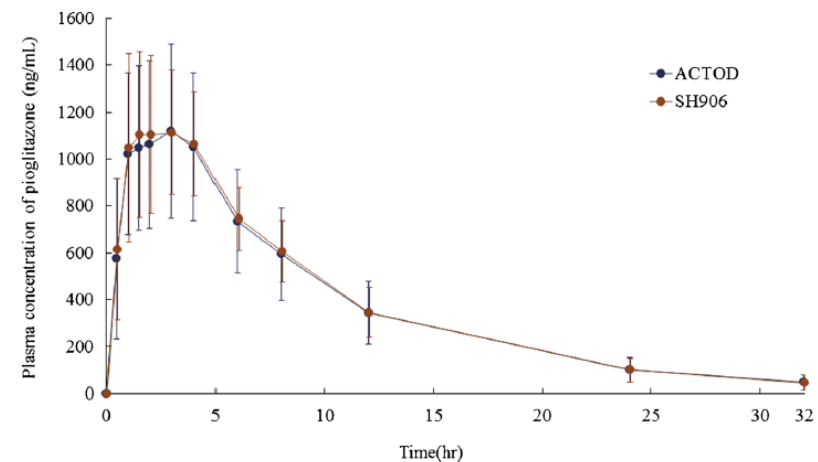
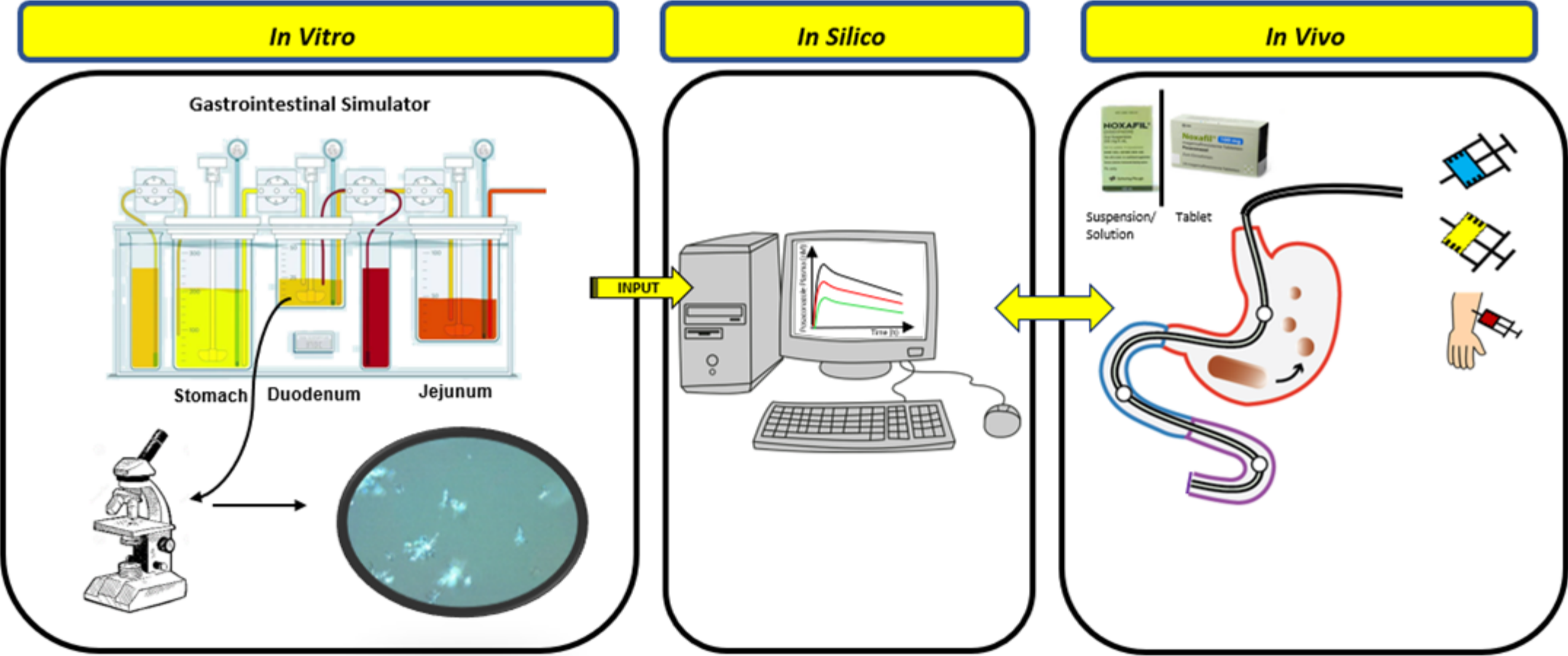


Fig. 8. Plasma concentration-time profiles of pioglitazone after an oral administration of a product in healthy male volunteers. Each data point represents mean±S.D. (n=24)

# Evaluation and Optimized Selection of Supersaturating Drug Delivery Systems of Posaconazole (BCS class 2b) in the Gastrointestinal Simulator (GIS): an in vitro-in silico-in vivo Approach



# Kinetic Dissolution from In Vitro Microdissolution Test for Model Compounds

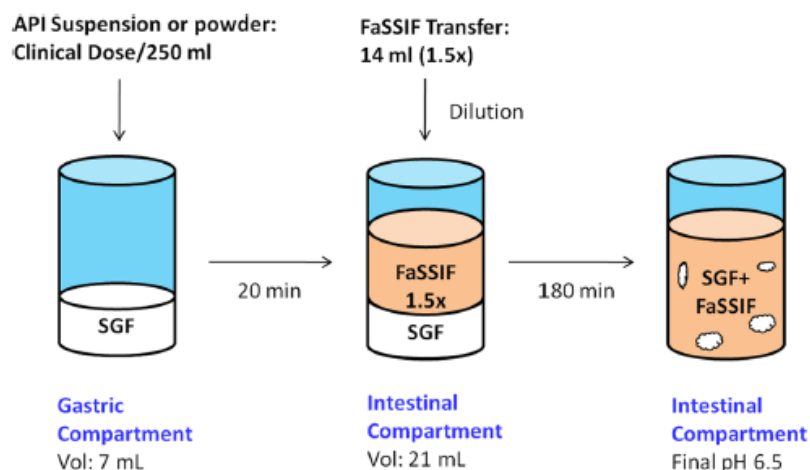


Figure 1. Schematic diagram of *in vitro* microdissolution pH-shift test.

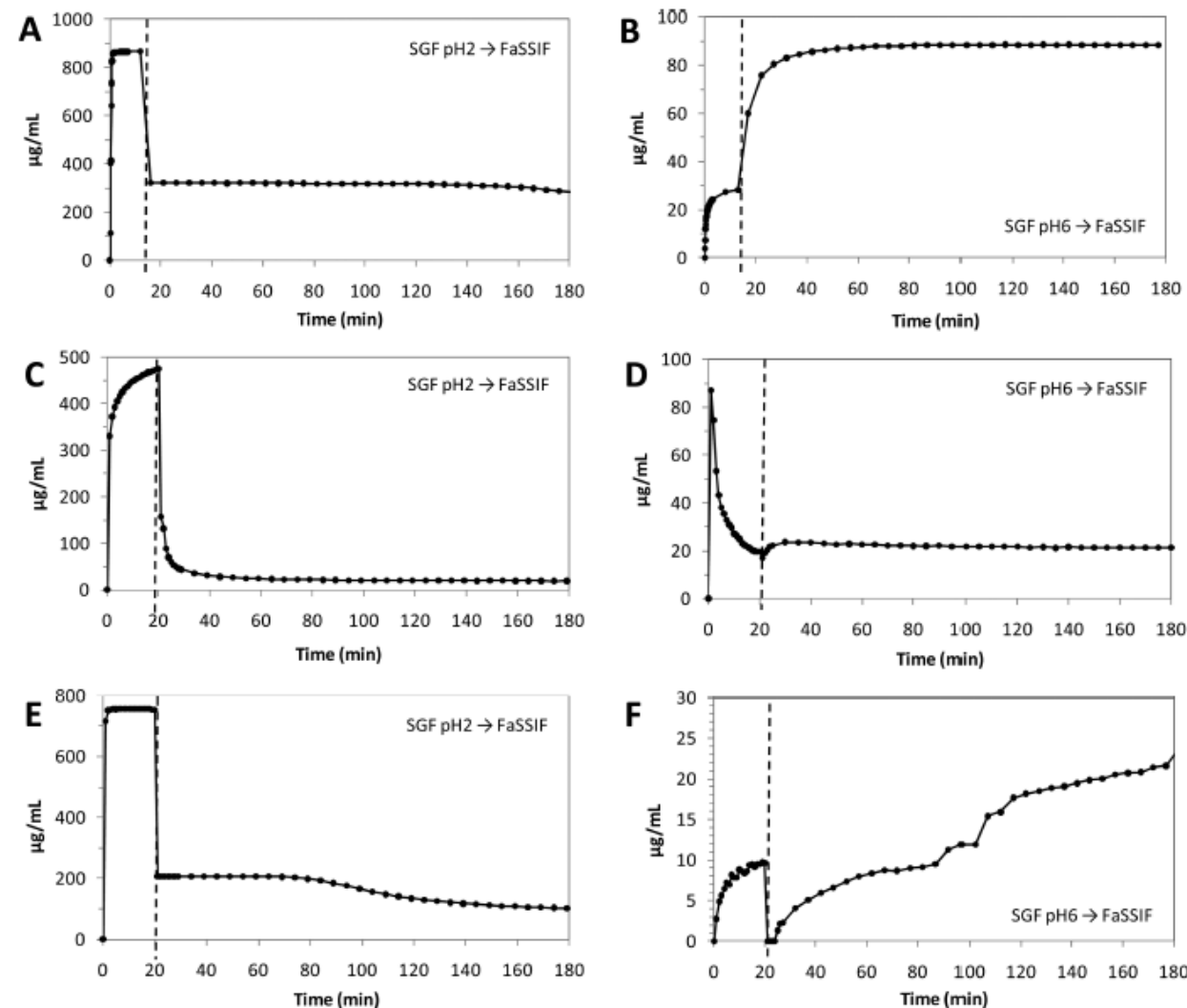
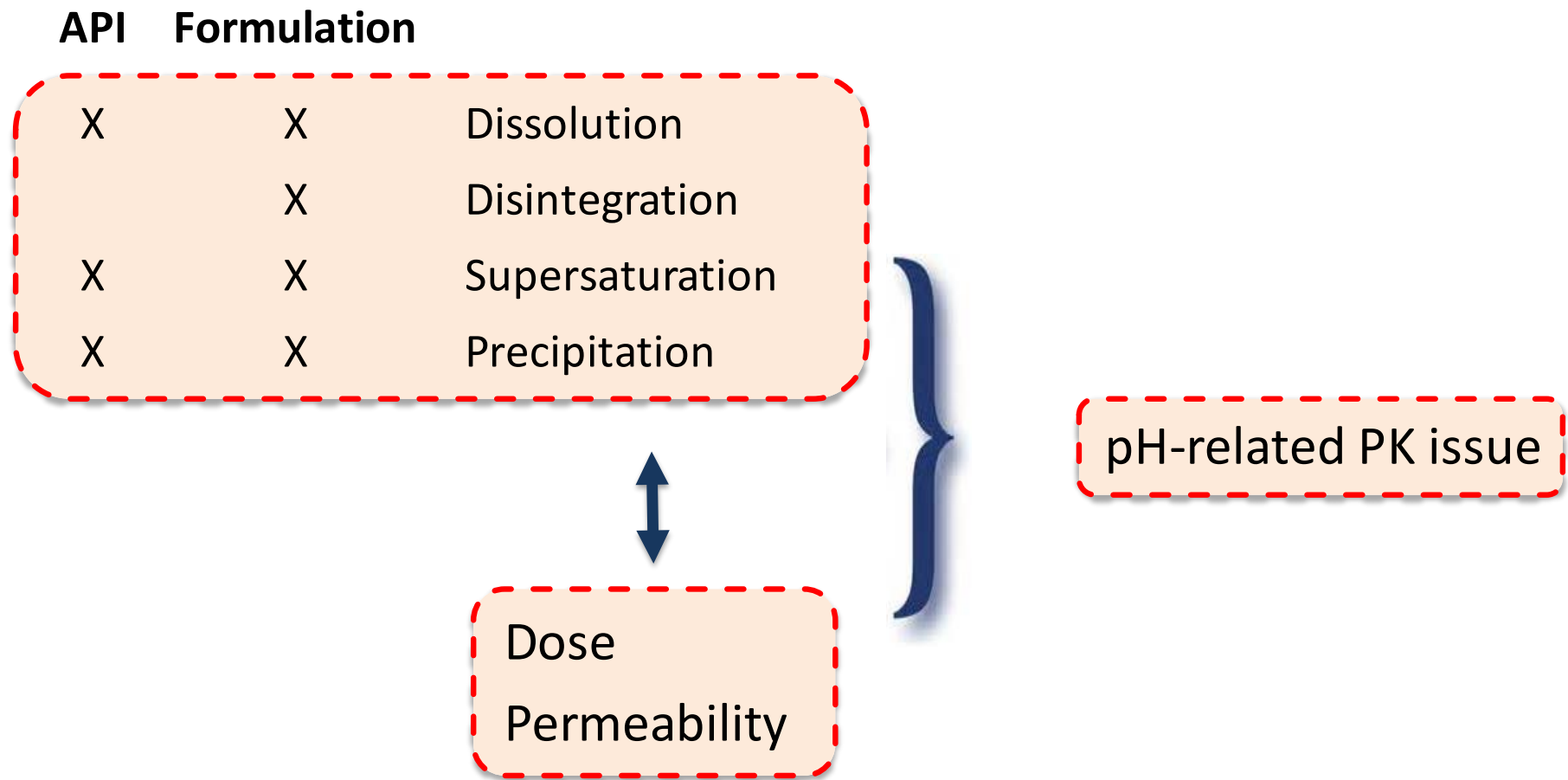


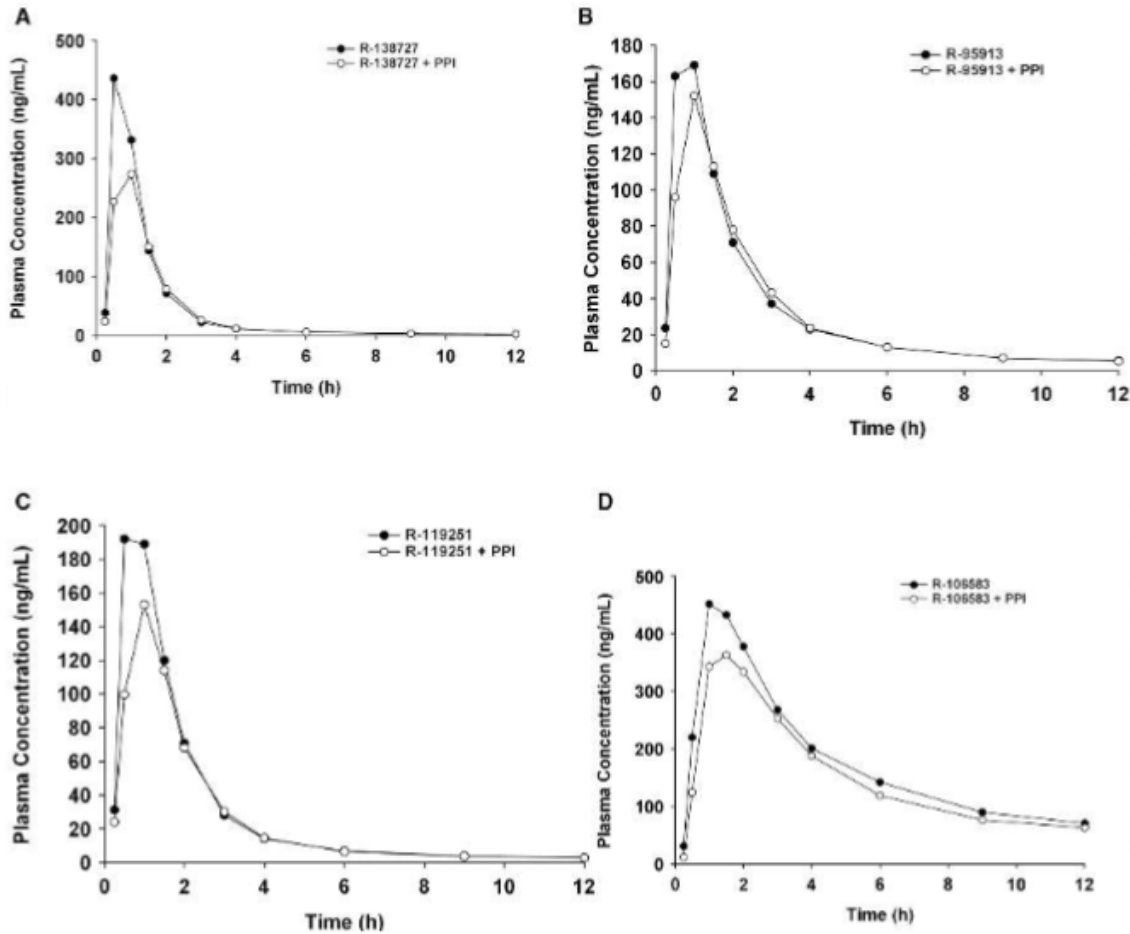
Figure 2. Kinetic dissolution from *in vitro* microdissolution test for model compounds: Gefitinib at gastric pH 2 (panel A) and pH 6 (panel B) at a dose equivalent to a 250 mg human dose; Erlotinib at gastric pH 2 (panel C) and pH 6 (panel D) at a dose equivalent to a 150 mg human dose; Ketoconazole at gastric pH 2 (panel E) and pH 6 (panel F) at a dose equivalent to a 200 mg human dose. The dotted line denotes the time of the media transfer to FaSSIF.

# Is pH-related PK Issue Dissolution Rate Dependent or Other Kinetics Dependent?



# Dissolution Rate Dependent

Changes in  $C_{max}$   $\gg$  AUC



# Both Dissolution and Other Kinetics Dependent

Changes in AUC  $\gg$   $C_{max}$

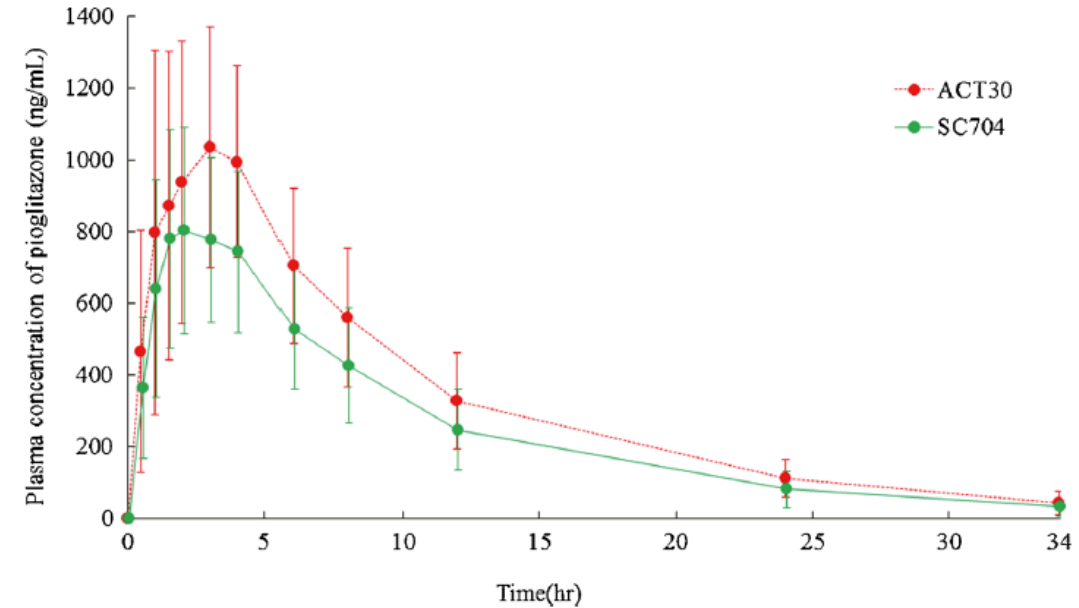


Fig. 2. Plasma concentration–time profiles of pioglitazone after an oral administration of a product in healthy male volunteers. Each data point represents mean  $\pm$  S.D. ( $n=20$ )

Figure 2. Geometric mean plasma concentrations for the prasugrel and clopidogrel metabolites with and without lansoprazole. (A) R-138727, (B) R-95913, (C) R-119251, (D) R-106583, and (E) SR26334. PPI, proton pump inhibitor.



# Regulatory Research Activities

- In Vivo Predictive Dissolution (IPD) to Advance Oral Product Bioequivalence Regulation  
*Awarded to the University of Michigan (#HHSF223201510157C)*
- Wireless Analysis Device to Measure In Vivo Drug Dissolution in the Gastrointestinal Tract  
*Awarded to the University of Michigan (#HHSF223201510146)*
- Modernization of in vivo-in vitro oral bioperformance prediction and assessment  
*Awarded to the University of Michigan (#HHSF223201310144C)*
- Integrating supersaturation-precipitation mechanisms in mechanistic oral absorption models for predicting in vivo performance  
*Awarded to Simcyp Limited (1U01FD005862)*
- Phase behavior and transformation kinetics of a poorly water soluble weakly basic drug upon transit from low to high pH conditions  
*Awarded to Purdue Univeristy (#HHSF223201710137C)*
- Evaluation of formulation dependence of drug-drug interaction with proton pump inhibitors (PPIs) for oral extended-release drug products  
*Awarded to BioPharma Services USA INC. (#HHSF223201610004I)*

# Summary



- pH-related PK issue is a function of several factors that control disintegration, dissolution, supersaturation, and precipitation
- In vivo predictive dissolution method is needed to evaluate pH-related PK issue
- Fully validated PBPK model may be used to predict pH-related PK issue



# Acknowledgements



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Dr. Liang Zhao

Dr. Lei Zhang

Dr. Robert Lionberger

Dr. Gordon L. Amidon (University of Michigan, USA)

Dr. Gregory E. Amidon (University of Michigan, USA)

Dr. Duxin Sun (University of Michigan, USA)

Dr. Marival Bermejo (Miguel Hernandez University, ES)

Dr. James Brasseur (University of Colorado, USA)

Dr. Luca Marciani ( University of Nottingham, UK)

Dr. David Barnes Turner (Simcyp)

Dr. Patrick AUGUSTIJNS ( University of Leuven)

Dr. Lynne Tayler (Purdue University)

*BioPharma Services USA INC*

All the postdoc fellows and graduate students