



Translating Scientific Advances to Regulatory Methods Assessment of Cutaneous Pharmacokinetics

Innovations in Dermatological Sciences Conference
September 29, 2022

Priyanka Ghosh, PhD

Office of Research and Standards (ORS), Office of Generic Drugs (OGD)

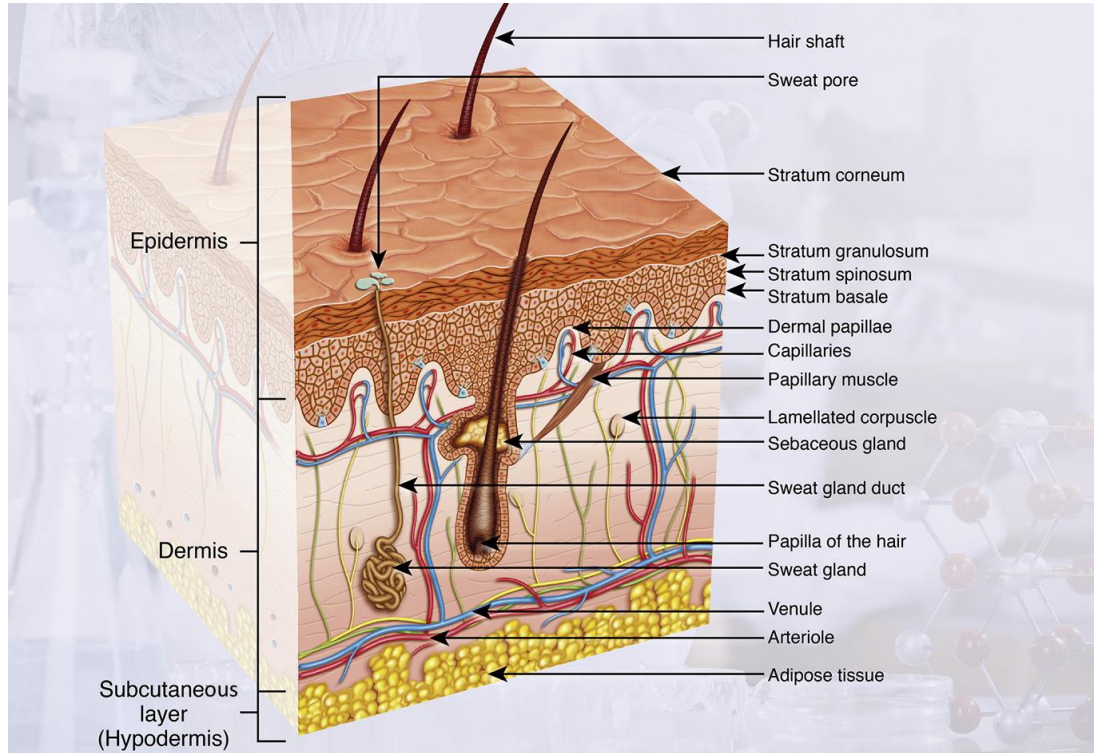
CDER | U.S. FDA

Disclaimer



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

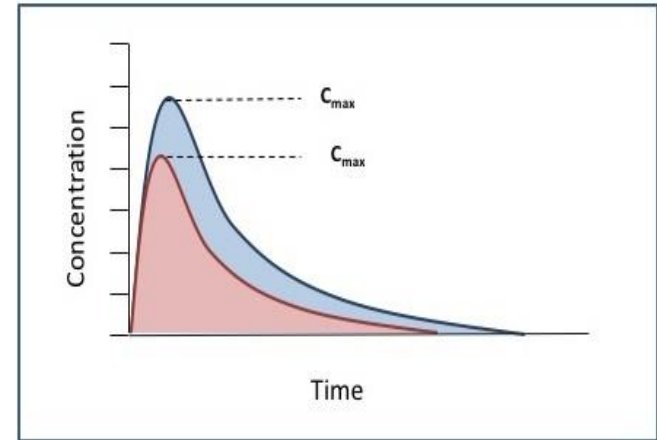
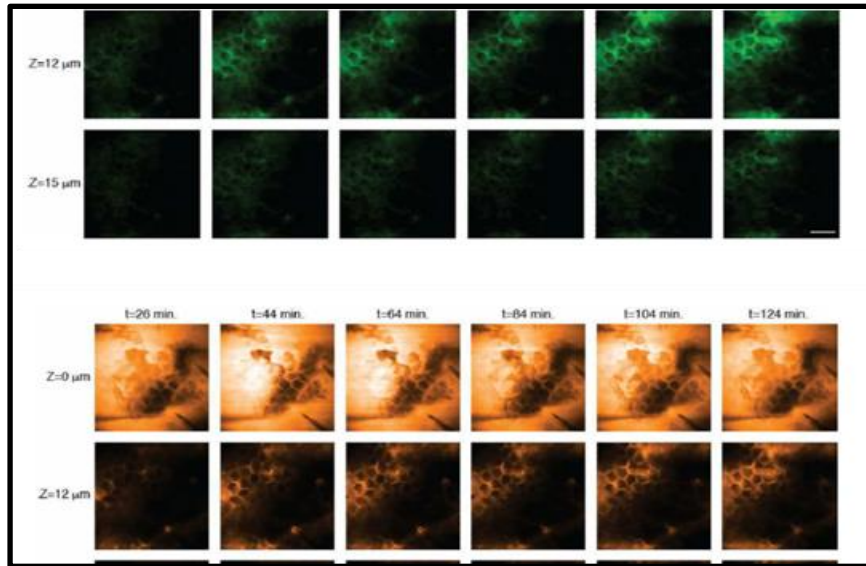
Skin Anatomy



Potential of Cutaneous Pharmacokinetics (PK)



Can we develop **cutaneous PK** based methods to quantify drugs in “**real time**” at or near the **site of action** in the skin?



Cutaneous PK Techniques

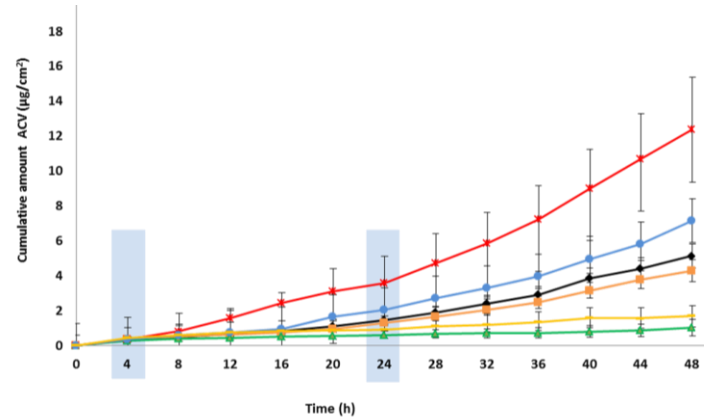
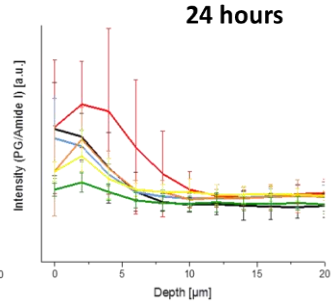
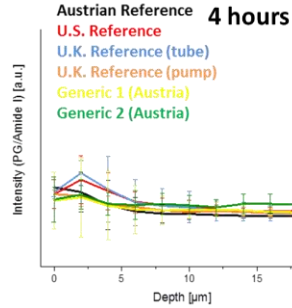
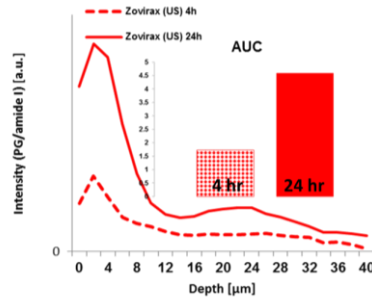
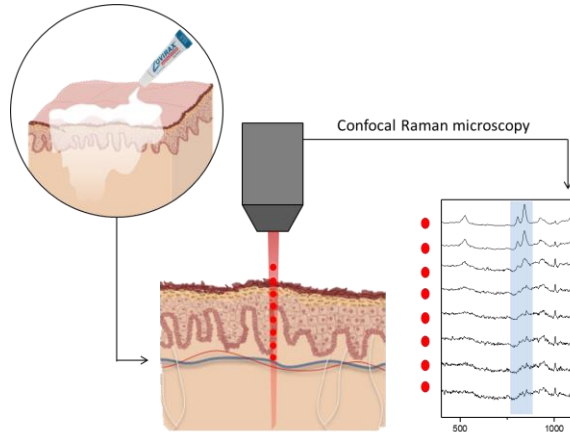
- Epidermal PK

- Tapestripping “Dermatopharmacokinetics” (DPK)
- In vitro Permeation Testing (IVPT)
- Epidermal and/or Dermal Pharmacokinetic Tomography e.g., Raman based methods

- Dermal PK

- Dermal Open Flow Microperfusion (dOFM)
- Dermal Microdialysis (dMD)

Epidermal PK



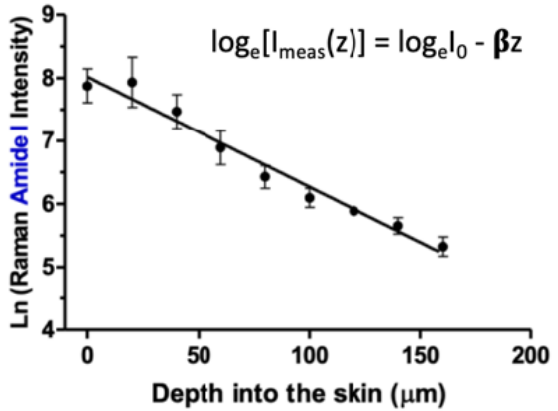
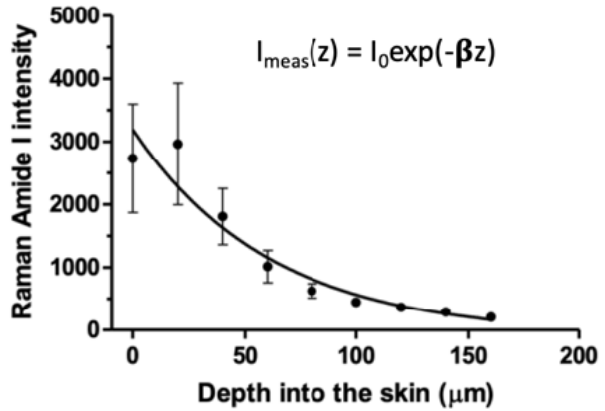
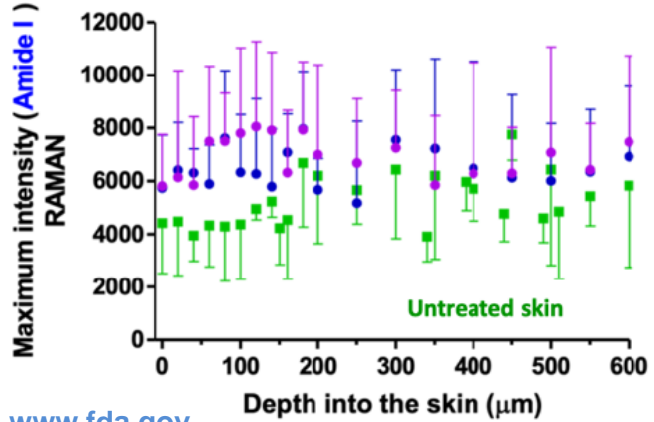
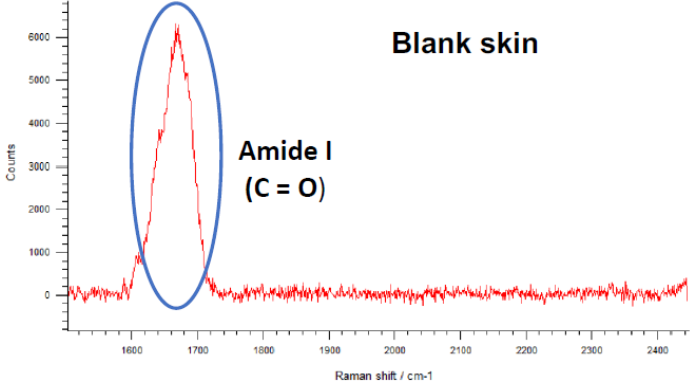
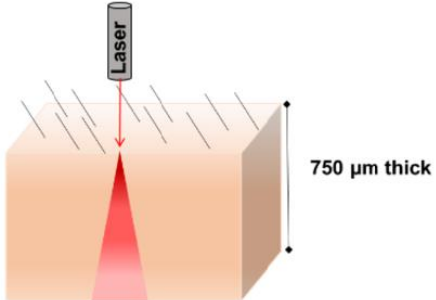
Challenges with Imaging-based tools

Examples of Historical limitations

- *Challenges with detection of molecule in the skin*
- *Challenges related to signal attenuation within the skin*
- *Challenges related to utility of tool as a semi-quantitative evaluation technique*
- *Challenges associated with limited utility, applicable for molecules with unique Raman signal*
- *Challenges related to data collection and data analysis of spectroscopic data*
- *Development of validation strategies for utilization of method in a regulatory setting*

Strategies to Correct for Signal Attenuation

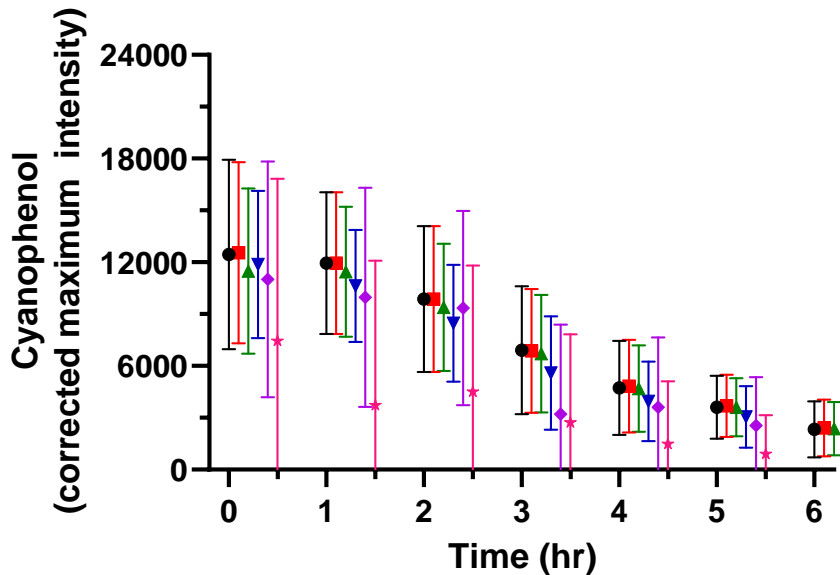
“Top-down” experiments



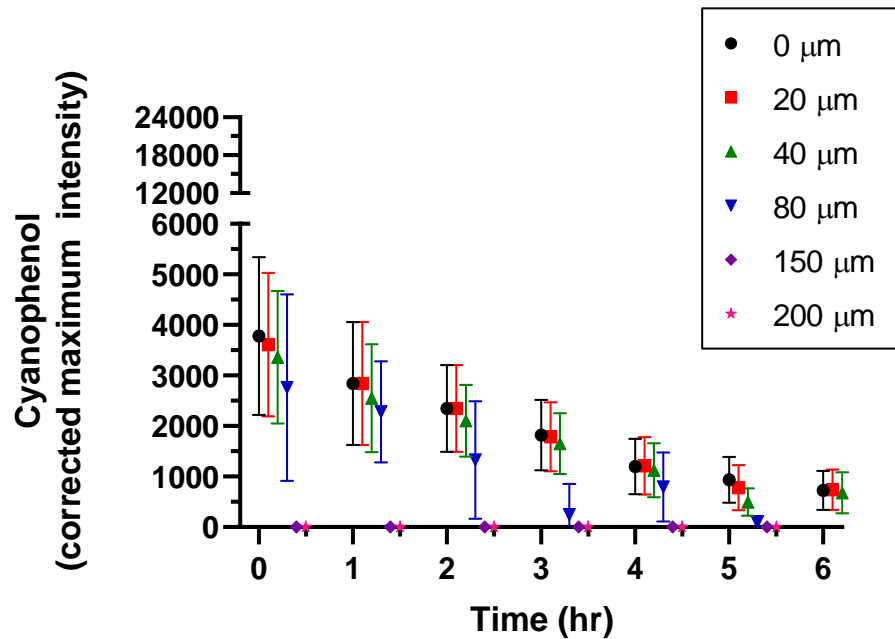
Evaluation of Epidermal PK



**Saturated solution
(50:50 Propylene glycol : water)**



**25% Saturated solution
(50:50 Propylene glycol : water)**

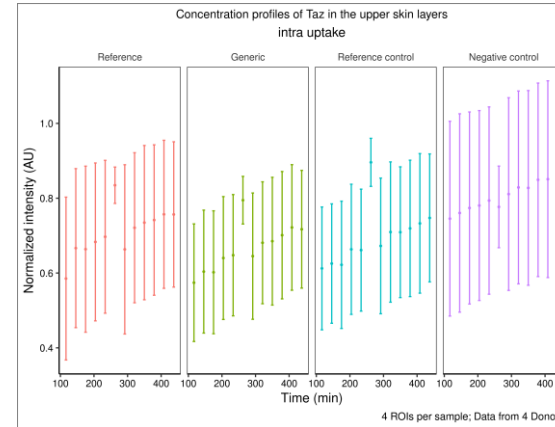


Evaluation of Epidermal PK

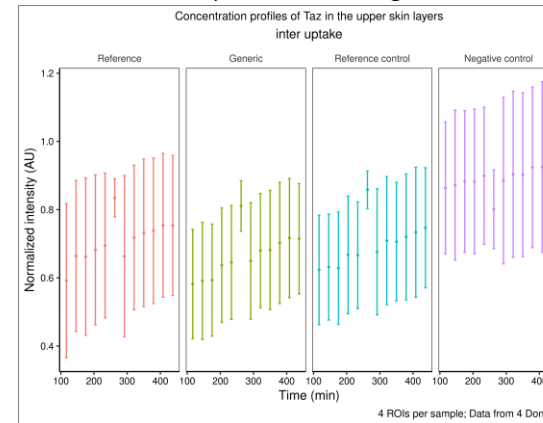
Reference product: Tazorac[®] cream (x2)
Test product: Generic tazarotene cream
Alternate formulation: Tazorac[®] gel
Alternate formulation: Lab made tazarotene solution in PEG

Number of skin samples & regions of interest (ROIs)	4 donors 4 replicates per formulation 4 ROIs per skin sample
Depth stack	Step size: 8 μm ; final depth at 64 μm
Study duration	~6.5 hours of imaging (15 cycles)
Skin uptake conditions	Finite dose (5 μL); Occlusive; 32°C

Within Lipid-Rich Skin Regions



Within Lipid-Poor Skin Regions



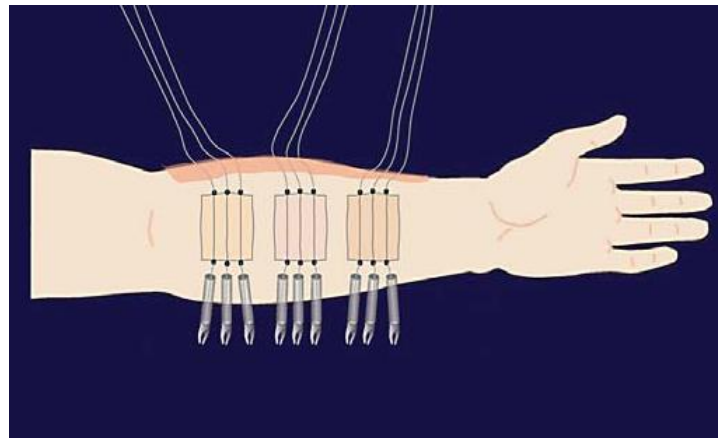
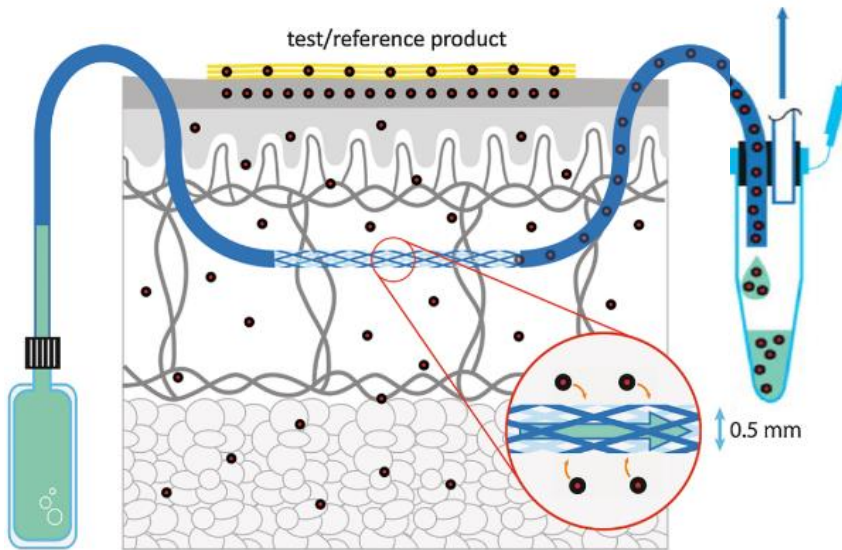


Current State and Next Steps

- *Detection of molecule in the skin*
 - *We can detect certain active ingredients in formulations; however, we are exploring advanced techniques e.g., Sparse Spectral Sampling Stimulated Raman Scattering*
- *Utility of tool as a semi-quantitative evaluation technique*
 - *Preliminary in vitro data with multiple molecules suggests that comparison of cutaneous PK is feasible using the technique*
- *Data collection and data analysis of spectroscopic data*
 - *Multiple approaches including Deep Learning utilized to automate data collection and processing*
- *Development of validation strategies for utilization of method in a regulatory setting*
 - *Currently we are utilizing available data to identify relevant parameters for assessment of cutaneous PK data*
 - *Future scope of work would include development of method validation strategies*

Dermal PK

- Microdialysis (dMD) and Open Flow Microperfusion (dOFM) directly measure the in vivo rate and extent of drug bioavailability at/near the site of action in the skin.

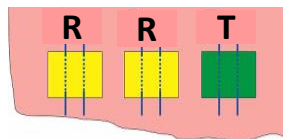
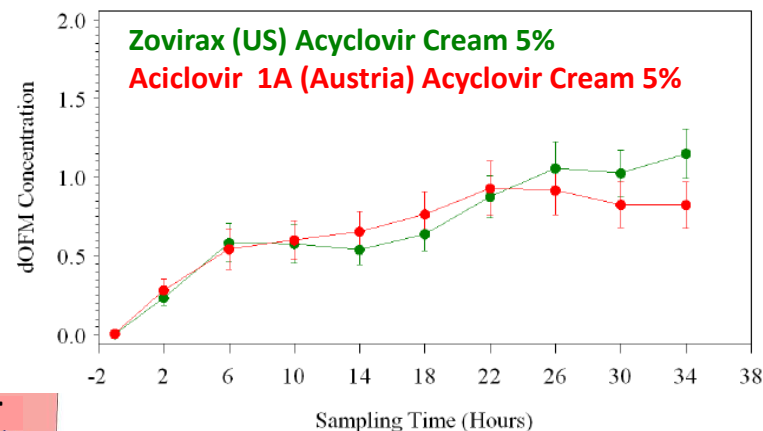
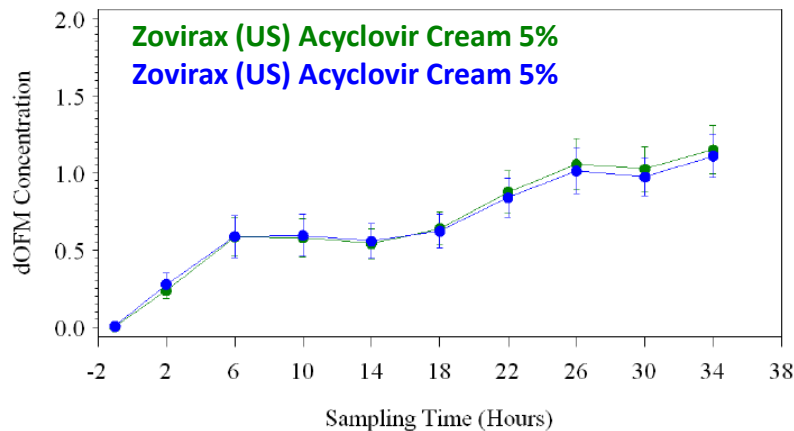


Dermal PK

Examples of Historical limitations

- Analytical limitations/High variability in the data
- Study controls: Application site, dose, application technique, probe depth, barrier integrity, flow rates
- Development of data analysis strategies
- Development method validation strategies

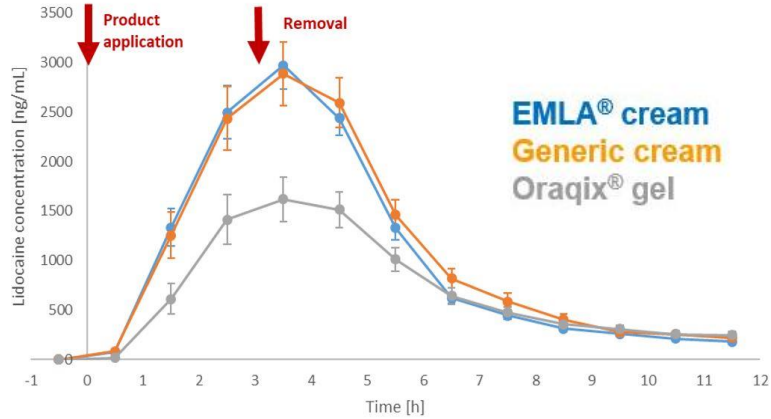
Dermal PK - dOFM



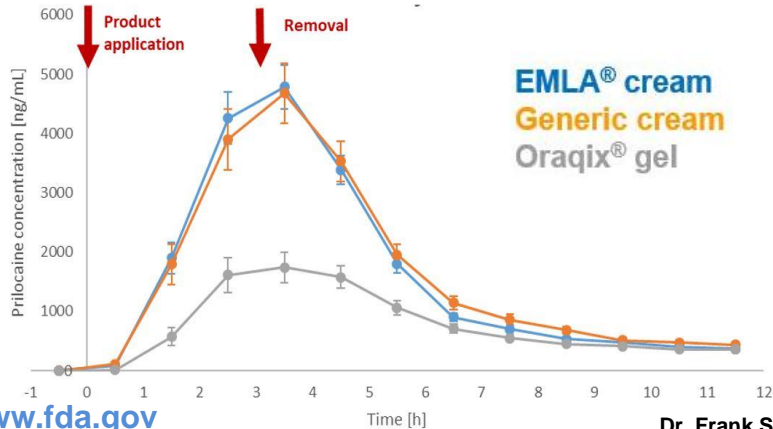
Outcome variable	CI _{90%}	BE-limits	BE
log(AUC _{0-36h})	[-0.148 ; 0.162] or [86.2 % ; 117.5 %]	[-0.223 ; 0.223]	passed
log(C _{max})	[-0.155 ; 0.190] or [85.7 % ; 120.9%]	[80% ; 125%]	passed

Outcome variable	CI _{90%}	BE-limits	BE
log(AUC _{0-36h})	[-0.369 ; 0.050] or [69.1 % ; 105.2 %]	[-0.223 ; 0.223]	x Failed
log(C _{max})	[-0.498 ; 0.022] or [60.8 % ; 102.2%]	[80% ; 125%]	x Failed

Dermal PK - dOFM

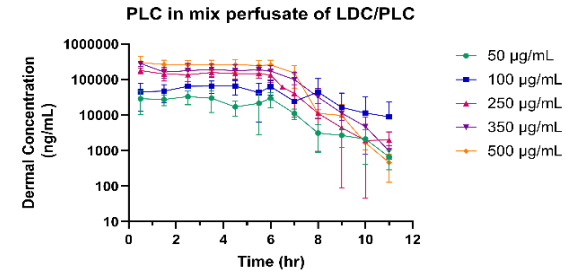
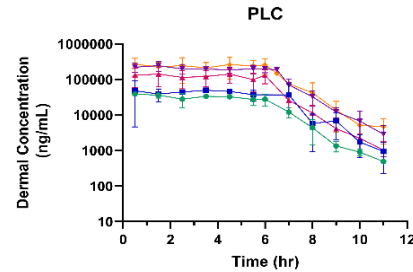
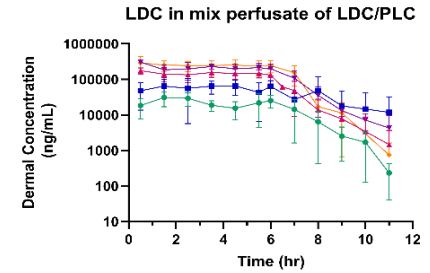
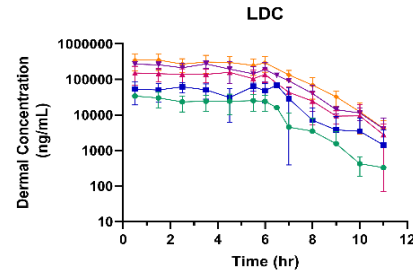
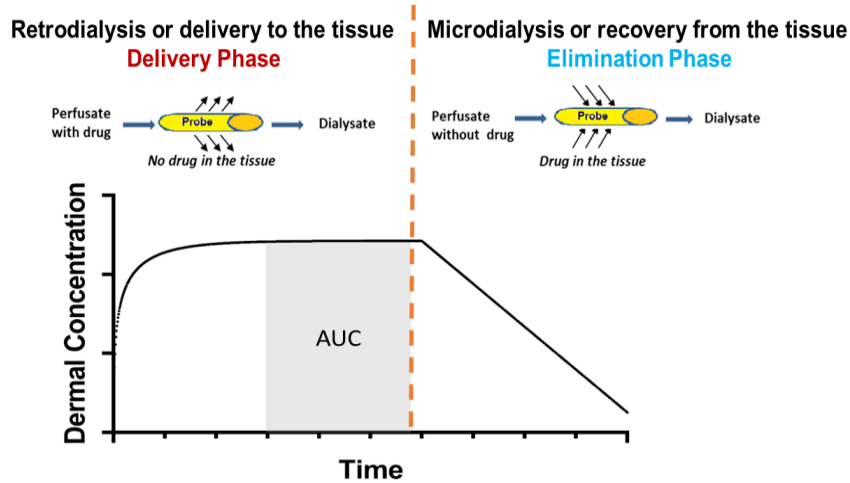


R: EMLA[®] (lidocaine; prilocaine) topical cream, 2.5%; 2.5 %
 T_{generic} : generic lidocaine; prilocaine cream, 2.5%; 2.5%
 $T_{\text{non-equ}}$: Oraqix[®] (lidocaine; prilocaine) dental gel, 2.5%; 2.5%

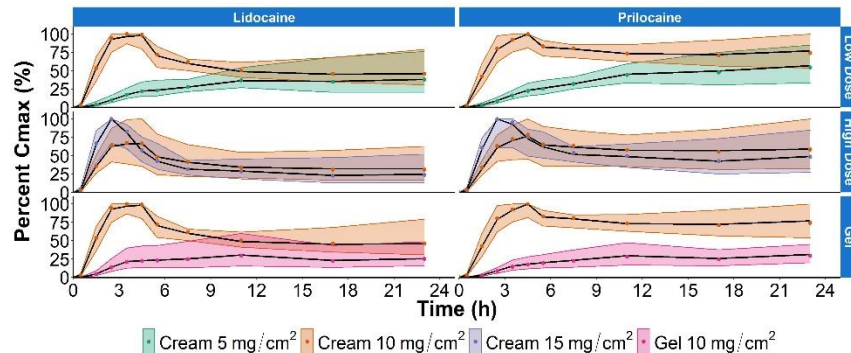
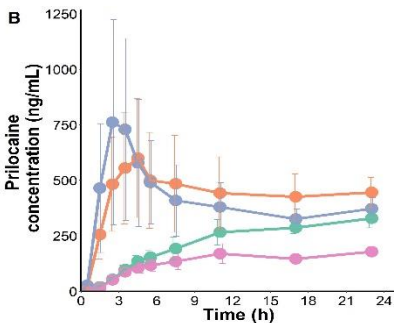
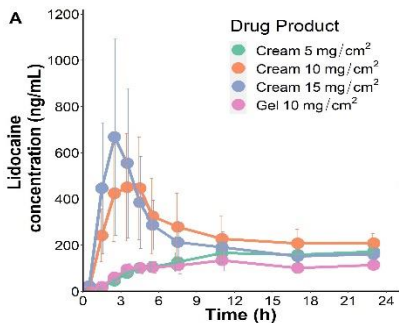


	PK endpoint	Drug	95% upper confidence bound	BE - criterion satisfied	Result
$T_{\text{gen vs. R}_1}$	AUC ₀₋₁₂	lidocaine	-0.053	Yes	The generic cream is bioequivalent to the reference cream.
	C _{MAX}		-0.055	Yes	
	AUC ₀₋₁₂	prilocaine	-0.051	Yes	
	C _{MAX}		-0.043	Yes	
$T_{\text{non-equ vs. R}_2}$	AUC ₀₋₁₂	lidocaine	0.330	No	The gel is not bioequivalent to the reference cream.
	C _{MAX}		0.623	No	
	AUC ₀₋₁₂	prilocaine	0.703	No	
	C _{MAX}		1.174	No	

Dermal PK - Microdialysis



Cutaneous PK – Data Analysis



Dose vs Cream 10 mg/cm ²	Point Estimate				Bootstrap (n=1000)			
	Percent conc profile		Percent AUC profile		Percent conc profile		Percent AUC profile	
	Lidocaine	Prilocaine	Lidocaine	Prilocaine	Lidocaine	Prilocaine	Lidocaine	Prilocaine
f₁								
Cream 5 mg/cm ² (n=12)	65.5	63.4	64.6	63.1	63.1 (48.7 – 74.2)	61.3 (47.3 – 72.4)	62.1 (47.1 – 73.0)	61.0 (47.3 – 71.8)
Cream 15 mg/cm ² (n=12)	30.5	24.1	14.6	13.3	39.4 (21.6 – 73.4)	33.2 (17.4 – 62.2)	30.3 (11.4 – 68.0)	25.7 (10.1 – 56.4)
Gel 10 mg/cm ² (n=6)	70.2	76.0	69.4	75.7	67.2 (49.0 – 80.6)	74.2 (61.9 – 83.0)	65.7 (43.4 – 80.6)	73.5 (60.0 – 84.2)
f₂								
Cream 5 mg/cm ² (n=12)	15.6	15.7	27.6	29.8	16.8 (14.8 – 19.9)	16.6 (13.9 – 22.7)	29.0 (23.6 – 37.5)	31.0 (25.8 – 38.4)
Cream 15 mg/cm ² (n=12)	39.6	38.8	60.7	65.7	35.2 (27.9 – 42.3)	35.2 (27.2 – 43.9)	48.7 (33.1 – 65.1)	53.7 (38.2 – 70.2)
Gel 10 mg/cm ² (n=6)	15.5	13.0	25.3	24.6	17.0 (14.0 – 22.3)	13.6 (11.0 – 18.6)	27.3 (20.9 – 38.2)	25.5 (21.6 – 31.1)

For the purpose of this study, cutaneous PK profiles were considered to be discriminated if $f_1 > 15$ or $f_2 < 50$ and with bootstrap analysis when the 90% confidence interval (CI) for $f_1 > 15$ or for $f_2 < 50$



Current State and Next Steps

- *Analytical limitations/High variability in the data*
 - *We can reliably detect and compare active ingredients(s) in the dermis following topical application, approximately 20 subjects were used for the bioequivalence (BE) assessment*
- *Study controls: Application site, dose, application technique, probe depth, barrier integrity, flow rates*
 - *Relevant study controls have been identified and implemented*
- *Development of validation strategies for utilization of method in a regulatory setting*
 - *Currently we are utilizing available data to identify relevant parameters for assessment of cutaneous PK data*
 - *Equipment and method validation strategies*
 - *How we can use dermal PK data in conjunction with other available information/strategies (e.g., formulation information, modeling and simulation-based approaches) to support generic product development*

Potential Challenges with Implementation



- *Access to the techniques*
- *Expertise*
- *Cost*
- *Availability of standardized methodologies*



Summary

- Cutaneous PK techniques can be utilized to develop efficient strategies for evaluation of bioavailability for topical products applied to the skin
- Epidermal PK based methods appear to be promising, however they are currently in the early stages of development
- dOFM and dMD methods have the potential to support a demonstration of BE when the proposed method is optimized and controlled to be adequately discriminating and reproducible
- Goal of the Generic Drug User Fee Amendments (GDUFA)-funded research program is to develop efficient BE approaches for complex generic drug products including topical products applied to the skin

Acknowledgements



U.S. Food & Drug Administration

- Sam Raney, PhD
- Tannaz Ramezanli, PharmD, PhD
- Sagar Shukla, PharmD, PhD
- Ying Jiang, PhD
- Eleftheria Tsakalozou, PhD
- Markham Luke, MD PhD
- Robert Lionberger, PhD

Research Collaborators

Funding for research projects was made possible, in part, by the U.S. FDA through:

GDUFA Award U01FD004946

GDUFA Award U01FD005861

- **Dr. Frank Sinner, Joanneum Research**

GDUFA Award U01-FD005226

- **Dr. Michael Roberts, University of South Australia**

GDUFA Award U01FD005862

GDUFA Award U01FD006930

- **Dr. Grazia Stagni, Long Island University**

GDUFA Award U01FD006533

- **Dr. Richard Guy, University of Bath**

GDUFA Award U01FD006698

- **Dr. Conor Lee Evans at Massachusetts General Hospital/Harvard Medical School**



Priyanka Ghosh, PhD

Priyanka.ghosh@fda.hhs.gov