

Contains Nonbinding Recommendations
Draft Guidance on Clindamycin Phosphate

This draft guidance, when finalized, will represent the current thinking of the Food and Drug Administration (FDA, or the Agency) on this topic.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: Clindamycin phosphate

Form/Route: Lotion/topical

Recommended study: One study

Type of study: Bioequivalence (BE) Study with Clinical Endpoint
Design: Randomized, double blind, parallel, placebo controlled in vivo
Strength: EQ 1% Base
Subjects: Males and nonpregnant females with acne vulgaris
Additional comments: Specific recommendations are provided below.

Analytes to measure (in appropriate biological fluid): Not Applicable (N/A)

Bioequivalence based on (90% CI): Clinical Endpoint

Waiver request of in vivo testing: N/A

Dissolution test method and sampling times: N/A

Additional comments regarding the BE study with clinical endpoint:

1. The Office of Generic Drugs (OGD) recommends conducting a BE study with a clinical endpoint in the treatment of acne vulgaris. Subjects are to be randomized to receive the test product, the reference listed drug (RLD), or placebo (vehicle). The study treatment is to be shaken well immediately before using and administered twice daily, in the morning and evening, to the face as a thin film for 12 weeks. The two primary endpoints are: 1) mean percent change from baseline to Week 12 in the inflammatory (papules and pustules) lesion counts and 2) mean percent change from baseline to Week 12 in the non-inflammatory (open and closed comedones) lesion counts.
2. Inclusion Criteria (the sponsor may add additional criteria):
 - a. Male or non-pregnant, non-lactating female aged ≥ 12 and ≤ 40 years with a clinical diagnosis of acne vulgaris.
 - b. On the face, ≥ 25 non-inflammatory lesions (i.e., open and closed comedones) AND ≥ 20 inflammatory lesions (i.e., papules and pustules) AND ≤ 2 nodulocystic lesions (i.e., nodules and cysts).

- c. Investigator's Global Assessment (IGA) of acne severity Grade 2, 3, or 4 (per Table 1).

Table 1. Sample IGA Scale for Acne Vulgaris¹

Grade	Description
0	Clear skin with no inflammatory or noninflammatory lesions
1	Almost clear; rare noninflammatory lesions with no more than one small inflammatory lesion
2	Mild severity; greater than Grade 1; some noninflammatory lesions with no more than a few inflammatory lesions (papules/pustules only, no nodular lesions)
3	Moderate severity; greater than Grade 2; up to many noninflammatory lesions and may have some inflammatory lesions, but no more than one small nodular lesion
4*	Severe; greater than Grade 3; up to many noninflammatory lesions and may have some inflammatory lesions, but no more than a few nodular lesions

* The Case Report Forms for acne studies can allow for reporting by investigators of lesion worsening beyond Grade 4 with treatment. It is recommended that enrollment of acne vulgaris subjects not include subjects with nodulocystic acne. Subjects who worsen beyond Grade 4 are to be described in the safety evaluation.

- d. Willing to refrain from use of all other topical acne medications or antibiotics (other than study treatment) during the 12-week treatment period.
 - e. Willing to maintain constant any estrogen or oral contraceptive therapy during the 12-week treatment period.
 - f. If female of childbearing potential, willing to use an acceptable form of birth control during the study.
3. Exclusion Criteria (the sponsor may add additional criteria):
- a. Pregnant, breast feeding or planning a pregnancy.
 - b. Presence of any skin condition that would interfere with the diagnosis or assessment of acne vulgaris (e.g., on the face: rosacea, dermatitis, psoriasis, squamous cell carcinoma, eczema, acneform eruptions caused by medications, steroid acne, steroid folliculitis, or bacterial folliculitis).
 - c. Excessive facial hair (e.g. beards, sideburns, moustaches, etc.) that would interfere with diagnosis or assessment of acne vulgaris.
 - d. History of hypersensitivity or allergy to clindamycin or lincomycin and/or any of the study medication ingredients.
 - e. History of regional enteritis or ulcerative colitis, or a history of antibiotic-associated colitis.
 - f. Use within 6 months prior to baseline of oral retinoids (e.g. Accutane®) or therapeutic vitamin A supplements of greater than 10,000 units/day (multivitamins are allowed).

¹ U.S. Department of Health and Human Services, Food and Drug Administration, Center for Drug Evaluation and Research. Draft Guidance for Industry: Acne Vulgaris: Developing Drugs for Treatment. Clinical/Medical. September 2005. Accessed at <http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM071292.pdf>

- g. Use for less than 3 months prior to baseline of estrogens or oral contraceptives; use of such therapy must remain constant throughout the study.
 - h. Use on the face within 1 month prior to baseline of 1) cryodestruction or chemodestruction, 2) dermabrasion, 3) photodynamic therapy, 4) acne surgery, 5) intralesional steroids, or 6) x-ray therapy.
 - i. Use within 1 month prior to baseline of 1) spironolactone, 2) systemic steroids, 3) systemic antibiotics, 4) systemic treatment for acne vulgaris (other than oral retinoids, which require a 6-month washout), or 5) systemic anti-inflammatory agents.
 - j. Use within 2 weeks prior to baseline of 1) topical steroids, 2) topical retinoids, 3) topical acne treatments including over-the-counter preparations, 4) topical anti-inflammatory agents, or 5) topical antibiotics.
4. The protocol should include a list of the prescription and over-the-counter drug products, procedures, and activities that are prohibited during the study, such as:
 - a. Any other topical products applied to the face.
 - b. Medicated soaps used on the face.
 - c. Spironolactone.
 - d. Neuromuscular blocking agents.
 - e. Oral retinoids, therapeutic vitamin A supplements of greater than 10,000 units/day (multivitamins are allowed) or other systemic treatment for acne vulgaris.
 - f. Systemic (e.g., oral or injectable) antibiotics.
 - g. Systemic steroids, systemic anti-inflammatory agents or immunosuppressive drugs.
 - h. Antipruritics, including antihistamines, within 24 hours of study visits.
 - i. Use on the face of 1) cryodestruction or chemodestruction, 2) dermabrasion, 3) photodynamic therapy, 4) acne surgery, 5) intralesional steroids, or 6) x-ray therapy.
 - j. Use of hormonal contraceptives should not be initiated or changed during the study.
 - k. Use of tanning booths, sunbathing, or excessive exposure to the sun.
 5. The recommended two primary endpoints of the study are: 1) mean percent change from baseline to Week 12 (study Day 84) in the inflammatory (papules and pustules) lesion count and 2) mean percent change from baseline to Week 12 (study Day 84) in the non-inflammatory (open and closed comedones) lesion count. The protocol should clearly define papules, pustules, open comedones, closed comedones, nodules and cysts. When counting facial acne lesions, it is important that all lesions be counted, including those present on the nose. Counts of nodules and cysts should be reported separately and not included in the inflammatory or non-inflammatory lesion counts.
 6. Application site reactions such as erythema, dryness, burning/stinging, erosion, edema, pain and itching are to be recorded at each visit to allow a comparison between treatment groups. A descriptive analysis comparing the application site reactions for each treatment group is recommended. It is important to ensure that the test product is not worse than the reference product with regard to these expected application site reactions.

7. Please refer to the product-specific guidance on Adapalene; Benzoyl peroxide topical gel 0.3%; 2.5% (“Draft Guidance on Adapalene; Benzoyl Peroxide”) for a recommended approach to statistical analysis and study design for bioequivalence studies with clinical endpoints:
[\[https://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM533014.pdf\]](https://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM533014.pdf)
8. Study data should be submitted in a standardized format. Please refer to the study data standards published at www.fda.gov²

² Study Data Standards for Submission to CDER and CBER available at:
<https://www.fda.gov/Drugs/DevelopmentApprovalProcess/FormsSubmissionRequirements/ElectronicSubmissions/ucm248635.htm>