

---

# Guidance for Industry

## Powder Blends and Finished Dosage Units — Stratified In-Process Dosage Unit Sampling and Assessment

### *DRAFT GUIDANCE*

**This guidance document is being distributed for comment purposes only.**

Comments and suggestions regarding this draft document should be submitted within 60 days of publication in the *Federal Register* of the notice announcing the availability of the draft guidance. Submit comments to Dockets Management Branch (HFA-305), Food and Drug Administration, 5630 Fishers Lane, rm. 1061, Rockville, MD 20852. All comments should be identified with the docket number listed in the notice of availability that publishes in the *Federal Register*.

For questions regarding this draft document contact Jon E. Clark, 301-594-5613 or Mike Gavini, 301-827-9053.

**U.S. Department of Health and Human Services  
Food and Drug Administration  
Center for Drug Evaluation and Research (CDER)**

**October 2003  
Pharmaceutical CGMPs**

# Guidance for Industry

## Powder Blends and Finished Dosage Units — Stratified In-Process Dosage Unit Sampling and Assessment

*Additional copies are available from:  
Office of Training and Communication  
Division of Drug Information, HFD-240  
Center for Drug Evaluation and Research  
Food and Drug Administration  
5600 Fishers Lane  
Rockville, MD 20857  
(Tel) 301-827-4573*

*<http://www.fda.gov/cder/guidance/index.htm>*

**U.S. Department of Health and Human Services  
Food and Drug Administration  
Center for Drug Evaluation and Research (CDER)  
Office of Pharmaceutical Science (OPS)  
Office of Compliance (OC)**

**October 2003  
Pharmaceutical CGMPs**

*Contains Nonbinding Recommendations*

*Draft — Not for Implementation*

**TABLE OF CONTENTS**

<b>I. INTRODUCTION</b> .....	1
<b>II. BACKGROUND</b> .....	1
<b>III. SCOPE</b> .....	2
<b>IV. CORRELATION OF IN-PROCESS STRATIFIED SAMPLING WITH POWDER MIX AND FINISHED PRODUCT</b> .....	4
<b>A. Assessment of Powder Mix Uniformity</b> .....	4
<b>B. Correlation of Powder Mix Uniformity with Stratified In-Process Dosage Unit Data</b> .....	5
<b>C. Correlation of Stratified In-Process Samples with the Finished Product</b> .....	6
<b>V. EXHIBIT/VALIDATION BATCH POWDER MIX HOMOGENEITY</b> .....	6
<b>VI. VERIFICATION OF MANUFACTURING CRITERIA</b> .....	7
<b>A. In-Process Dosage Unit Sampling and Analysis</b> .....	7
<b>B. Criteria to Meet the <i>Readily Pass</i> Classification</b> .....	8
<b>C. Criteria to Meet the <i>Marginally Pass</i> Classification</b> .....	8
<b>D. Sample Locations for Routine Manufacturing</b> .....	9
<b>VII. ROUTINE MANUFACTURING BATCH TESTING METHODS</b> .....	9
<b>A. Standard Criteria Method (SCM)</b> .....	9
1. <i>Stage 1 Test</i> .....	10
2. <i>Stage 2 Test</i> .....	10
<b>B. Marginal Criteria Method (MCM)</b> .....	10
<b>C. Switching to Standard Test Method from Marginal Test Method</b> .....	11
<b>VIII. REPORTING THE USE OF STRATIFIED SAMPLING</b> .....	11
<b>A. Applications Not Yet Approved</b> .....	11
<b>B. Postapproval Change</b> .....	12
<b>GLOSSARY</b> .....	13
<b>ATTACHMENT 1: VERIFICATION OF MANUFACTURING CRITERIA</b> .....	14
<b>ATTACHMENT 2: ROUTINE MANUFACTURING BATCH TESTING</b> .....	15

*Contains Nonbinding Recommendations*

*Draft — Not for Implementation*

**Guidance for Industry<sup>1</sup>**

**Powder Blends and Finished Dosage Units — Stratified In-Process Dosage Unit Sampling and Assessment**

This draft guidance, when finalized, will represent the Food and Drug Administration's (FDA's) current thinking on this topic. It does not create or confer any rights for or on any person and does not operate to bind FDA or the public. You can use an alternative approach if the approach satisfies the requirements of the applicable statutes and regulations. If you want to discuss an alternative approach, contact the FDA staff responsible for implementing this guidance. If you cannot identify the appropriate FDA staff, call the appropriate number listed on the title page of this guidance.

**I. INTRODUCTION**

This guidance is intended to assist manufacturers of human drug products in meeting the requirements of 21 CFR 211.110 for demonstrating the adequacy of mixing to ensure uniformity of in-process powder blends and finished dosage units. This guidance describes the procedures for assessing powder mix adequacy, correlating in-process dosage unit test results with powder mix test results, and establishing the initial criteria for control procedures used in routine manufacturing.

FDA's guidance documents, including this guidance, do not establish legally enforceable responsibilities. Instead, guidances describe the Agency's current thinking on a topic and should be viewed only as recommendations, unless specific regulatory or statutory requirements are cited. The use of the word *should* in Agency guidances means that something is suggested or recommended, but not required.

**II. BACKGROUND**

This guidance is the result of an Agency effort to achieve a science-based policy and regulatory enforcement. Experts from industry, academia, and the FDA developed the principles underlying this guidance after extensive public discussion. A brief history of the evolution of this guidance is provided in the following paragraphs.

---

<sup>1</sup> This guidance has been prepared by the Office of Pharmaceutical Science and the Office of Compliance in the Center for Drug Evaluation and Research (CDER) at the Food and Drug Administration in cooperation with the Product Quality Research Institute (PQRI) (see footnote 3). This guidance document represents the Agency's current thinking on assessment of the uniformity of powder blends and finished dosage units in the absence of new technology development or implementation.

## ***Contains Nonbinding Recommendations***

*Draft — Not for Implementation*

38  
39 In response to industry concerns regarding regulations for demonstrating the adequacy of in-  
40 process powder mixing, the FDA published a draft guidance for industry on blend uniformity  
41 analysis in August 1999.<sup>2</sup> Comments submitted to the docket resulted in the formation of the  
42 Blend Uniformity Working Group (BUWG) by the Product Quality Research Institute (PQRI).<sup>3</sup>  
43 The PQRI BUWG conducted a public meeting, PQRI Workshop on Blend Uniformity, on  
44 September 7 and 8, 2000.

45  
46 Using the consensus reached by participants in this workshop, the BUWG developed a draft  
47 recommendation, *The Use of Stratified Sampling of Blend and Dosage Units to Demonstrate*  
48 *Adequacy of Mix for Powder Blends*. The draft recommendation received examination and peer  
49 review in multiple scientific and public venues. In addition, the Advisory Committee for  
50 Pharmaceutical Science (ACPS) reviewed the draft recommendation and received public  
51 comment during scheduled meetings of the committee.<sup>4</sup> The draft recommendation was revised  
52 to incorporate the results of peer review and public comment and was presented to CDER's  
53 Center Director in final form on December 30, 2002. The recommendation was subsequently  
54 published in the *PDA Journal of Pharmaceutical Science and Technology*.<sup>5</sup> This draft guidance  
55 reflects CDER's effort to incorporate the draft recommendation into regulatory policy.

56  
57

### **III. SCOPE**

58  
59  
60 *Stratified sampling* is the process of sampling dosage units at predefined intervals and collecting  
61 representative samples from specifically targeted locations in the compression/filling operation  
62 that have the greatest potential to yield extreme highs and lows in test results. These test results  
63 are used to monitor the manufacturing process output that is most responsible for causing  
64 finished product variability. The test results can be used to develop a single control procedure to  
65 ensure adequate powder mix and uniform content in finished products.

66  
67 The methods described in this guidance are not intended to be the only methods for meeting  
68 Agency requirements to demonstrate the adequacy of powder mix. Traditional powder blend  
69 sampling and testing, in conjunction with testing for uniformity of content in the finished  
70 product, can be used to comply with current good manufacturing practice requirements

---

<sup>2</sup> The FDA withdrew the guidance for industry *ANDAs: Blend Uniformity Analysis* on May 17, 2002.

<sup>3</sup> PQRI is a collaborative body involving FDA's Center for Drug Evaluation and Research (CDER), industry, and academia. Since its inception in January 1996, the mission of PQRI has been to generate scientific information in support of regulatory policies through research. Additional information about PQRI is available at [www.pqri.org](http://www.pqri.org).

<sup>4</sup> The PQRI BUWG recommendation appeared on the public ACPS agenda on November 28, 2001 (introduction), May 8, 2002 (distribution and comment), and October 22, 2002 (final comment).

<sup>5</sup> G Boehm, J Clark, J Dietrick, L Foust, T Garcia, M Gavini, L Gelber, J Geoffrey, J Hoblitzell, P Jimenez, G Mergen, F Muzzio, J Planchard, J Prescott, J Timmermans, and N Takiar, "The Use of Stratified Sampling of Blend and Dosage Units to Demonstrate Adequacy of Mix for Powder Blends, *PDA J. Pharm. Sci Technol.*, 57:59-74, 2003.

## ***Contains Nonbinding Recommendations***

*Draft — Not for Implementation*

71 (CGMPs). Use of at-, in-, or on-line measurement systems can also be appropriate and are  
72 described in other guidance documents.<sup>6</sup>

73

74 This guidance provides recommendations on how to:

75

- 76 • Conduct powder blend sampling and analyses.
- 77 • Establish initial criteria for stratified sampling of in-process dosage units<sup>7</sup> and evaluation  
78 of test results.
- 79 • Analyze the stratified samples and evaluate data.
- 80 • Correlate the stratified sample data with the powder blend data.
- 81 • Assess powder mix uniformity.
- 82 • Correlate the stratified sample data with the finished dosage unit data and assess  
83 uniformity of content.
- 84 • Test exhibit and validation batches for adequacy of powder mix.
- 85 • Test and evaluate routine manufacturing batches.
- 86 • Report the use of stratified sampling in the application.

87

88 The methods described in this guidance can be used to monitor active ingredient homogeneity of  
89 powder blends and to ensure uniform content of the finished product for solid oral drug products.  
90 These methods are only one way to satisfy the CGMP and application review requirements for  
91 in-process testing to demonstrate adequacy of powder mix and uniform content of the finished  
92 product. The method assumes appropriate monitoring of all manufacturing steps as required by  
93 the regulations or application commitments. This guidance does not discuss the assessment of  
94 the potency and other attributes that can affect the finished dosage units, or the homogeneity of  
95 inactive ingredients. Formulations with extremely low dose and/or high potency may call for  
96 more rigorous sampling than that described in this guidance to assess the uniformity of powder  
97 blends or the uniformity of content of the finished dosage units.

98

99 When using the methods described in this guidance, certain data or trends may be observed. We  
100 recommend that manufacturers scientifically evaluate these types of research data to determine if  
101 they affect the quality of a product and, if so, how. The FDA does not intend to inspect research  
102 data collected on an existing product for the purpose of evaluating the suitability of proposed  
103 methods. Any FDA decision to inspect research data would be based on exceptional situations

---

<sup>6</sup> In August 2003, the Agency issued the draft guidance for industry *PAT – A Framework for Innovative Pharmaceutical Manufacturing and Quality Assurance*. Once finalized, it will represent the Agency's perspective on this issue.

<sup>7</sup> The in-process dosage unit is a capsule or tablet as it is formed in the manufacturing process before it is coated or packaged.

## ***Contains Nonbinding Recommendations***

*Draft — Not for Implementation*

104 similar to those outlined in Compliance Policy Guide Sec. 130.300.<sup>8</sup> Those data used to support  
105 validation or regulatory submissions will be subject to inspection in the usual manner.

106

107

### **108 IV. CORRELATION OF IN-PROCESS STRATIFIED SAMPLING WITH POWDER 109 MIX AND FINISHED PRODUCT**

110

111 If you plan to follow the procedures described in this guidance document, we recommend that  
112 you first complete the process development procedures described in this section before using the  
113 methods described in sections V, VI, VII. The subsections below describe how to assess the  
114 adequacy of powder mix, uniformity of content of the in-process and finished dosage units  
115 through correlation and assessment of data from development, validation and manufacturing  
116 batches. These procedures can reveal deficiencies in the blending operation that may not have  
117 been previously detected. We recommend that manufacturers correct deficiencies in the  
118 blending operation before implementing the routine manufacturing control methods described in  
119 this guidance.

120

#### **121 A. Assessment of Powder Mix Uniformity**

122

123 We recommend the assessment of powder mix uniformity using the following procedures:

124

125 • Conduct blend analysis on batches by extensively sampling the mix in the blender and/or  
126 intermediate bulk containers (IBCs).

127 • Identify appropriate blending time and speed ranges, dead spots in blenders, and locations  
128 of segregation in IBCs. Determine sampling errors.

129 • Define the effects of sample size (e.g., 1-10X dosage unit range) while developing a  
130 technique capable of measuring the true uniformity of the blend. Sample quantities larger  
131 than 3X can be used with adequate scientific justification. Appropriate blend sampling  
132 techniques and procedures should be developed for each product with consideration to  
133 various designs of blend powder sampling and the physical and chemical properties of  
134 the blend components.

135 • Design blend-sampling plans and evaluate them using appropriate statistical analyses.

136 • Quantitatively measure any variability that is present among the samples. Attribute the  
137 sample variability to either lack of uniformity of the blend or sampling error. Significant  
138 within-location variance in the blend data can be an indication of one factor or a  
139 combination of factors such as inadequacy of blend mix, sampling error<sup>9</sup> or

---

<sup>8</sup> FDA/ORA Compliance Policy Guide, Sec. 130.300, *FDA Access to Results of Quality Assurance Program Audits and Inspections* (CPG7151.02)

<sup>9</sup> If blend sampling error is detected, more sophisticated, statistical analyses should be applied to assess the situation, such as the use of methods described in J Berman, DE Elinski, CR Gonzales, JD Hofer, PJ Jimenez, JA Planchard, RJ Tlachac, PF Vogel, "Blend Uniformity Analysis: Validation and In-Process Testing." *Technical Report No. 25, PDA J Pharm. Sci. Technol.* 51(Suppl 3i-iii), S1-99, 1997.

## Contains Nonbinding Recommendations

Draft — Not for Implementation

140 agglomeration.<sup>10,11</sup> Significant between-location variance in the blend data can indicate  
141 that the blending operation is inadequate.

142

### 143 **B. Correlation of Powder Mix Uniformity with Stratified In-Process Dosage** 144 **Unit Data**

145

146 We recommend the following steps for correlation:

147

148 • Conduct periodic sampling and testing of the in-process dosage units by sampling them at  
149 defined intervals and locations throughout the compression or filling process. Use a  
150 minimum of 20 appropriately spaced in-process dosage unit sampling points. There  
151 should be at least 7 samples taken from each of these locations for a total minimum of at  
152 least 140 samples.

153 • Take 7 samples from each additional location to further assess each significant event,<sup>12</sup>  
154 such as filling or emptying of hoppers and IBCs, start and end of the compression or  
155 filling process and equipment shutdown. This may be accomplished by using process  
156 development batches, validation batches, or by using routine manufacturing batches for  
157 approved products.

158 • Significant events may also include observations or changes from one batch to another  
159 (e.g., batch scale-up and observations of undesirable trends in previous batch data).

160 • Prepare a summary of the data and analysis used to correlate the stratified sampling  
161 locations with significant events in the blending process. We recommend you submit this  
162 summary with the application as described in section VIII of this guidance.

163 • Compare the powder mix uniformity with the in-process dosage-unit data described  
164 above.

165 • Investigate any discrepancies observed between powder mix and dosage-unit data and  
166 establish root causes. At least one trouble-shooting guide is available that may be helpful  
167 with this task.<sup>13</sup> Possible corrections may range from going back to formulation  
168 development to improve powder characteristics to process optimization. Sampling

---

<sup>10</sup> OS Sudah, PE Arratia, D. Coffin-Beach, FJ Muzzio, "Mixing of Cohesive Pharmaceutical Formulations in Tote (Bin)-Blenders," *Drug Dev. Ind. Pharm.*, 28(8): 905-918, 2002.

<sup>11</sup> V Swaminathan, DO Kildsig, "Polydisperse powder mixtures: effect of particle size and shape on mixture stability," *Drug Dev. Ind. Pharm.*, 28(1):41-48, 2002.

<sup>12</sup> A *significant event* is any operation during the solid dosage production process that can affect the integrity of the in-process materials – see section IX Glossary.

<sup>13</sup> JK Prescott, TJ Garcia, "A Solid Dosage and Blend Content Uniformity Troubleshooting Diagram," *Pharm. Technol.*, 25 (3):68-88, 2001.



## ***Contains Nonbinding Recommendations***

*Draft — Not for Implementation*

169 problems may also be negated by use of alternate state-of-the-art methods of in situ real-  
170 time sampling and analysis.

171

### **C. Correlation of Stratified In-Process Samples with the Finished Product**

172

173

174

We recommend the following steps:

175

176

177

178

- Conduct testing for uniform content of the finished product using an appropriate procedure or as specified in the Abbreviated New Drug Application (ANDA) or the New Drug Application (NDA) for approved products.

179

180

181

- Compare the results of stratified in-process dosage unit analysis with uniform content of the finished dosage units from the previous step. This analysis should be done without weight correction.<sup>14</sup>

182

183

184

185

- Prepare a summary of the data and analysis used to conclude that the stratified in-process sampling provides assurance of uniform content of the finished product. We recommend you submit this summary with the application as described in section VIII of this guidance.

186

187

188

189

### **V. EXHIBIT/VALIDATION BATCH POWDER MIX HOMOGENEITY**

190

191

192

193

This section describes sampling and testing the powder mix of exhibit and process validation batches used to support implementing the stratified sampling method described in this guidance.

194

195

196

197

198

We recommend that during the manufacture of exhibit and process validation batches, you assess the uniformity of the powder blend, the in-process dosage units, and the finished product independently. We recommend you use the following steps to identify sampling locations and acceptance criteria prior to the manufacture of the exhibit and/or validation batches.<sup>15</sup>

199

200

201

202

203

204

205

206

207

1. Carefully identify at least 10 sampling locations in the blender to represent potential areas of poor blending. For example, in tumbling blenders (such as V-blenders, double cones, or drum mixers), samples should be selected from at least two depths along the axis of the blender. For convective blenders (such as a ribbon blender), a special effort should be made to implement uniform volumetric sampling to include the corners and discharge area (at least 20 locations are recommended to adequately validate convective blenders).
2. Collect at least 3 replicate samples from each location. Samples should meet the following criteria:

---

<sup>14</sup> Weight correction is a mathematical correction to eliminate the effect of potentially variable tablet weight on measurement of mix adequacy—see Glossary, Section IX.

<sup>15</sup> This is described in Section IV of this guidance.

## ***Contains Nonbinding Recommendations***

*Draft — Not for Implementation*

208  
209  
210  
211  
212  
213  
214  
215

- Assay one sample per location (number of samples (n)  $\geq$  10)  
(n = 20 for ribbon blender).
- RSD (*relative standard deviation*) of all individual results  $\leq$  5.0 percent.
- All individual results are within 10.0 percent (absolute) of the mean of the results.

216 If samples do not meet these criteria, we recommend that you investigate the failure according to  
217 the flow chart in Attachment 1. We also recommend that you not proceed any further with  
218 implementation of the methods described in this guidance until the criteria are met.  
219

220 Sampling errors may occur in some powder blends, sampling devices, and techniques that make  
221 it impractical to evaluate adequacy of mix using only the blend data. In such cases, we  
222 recommend that you use in-process dosage unit data in conjunction with blend sample data to  
223 evaluate blend uniformity.  
224

225 Some powder blends may present unacceptable safety risk when directly sampled. The safety  
226 risk, once described, may justify an alternate procedure. In such cases, process knowledge and  
227 data from indirect sampling combined with additional in-process dosage unit data may be  
228 adequate to demonstrate the adequacy of the powder mix. Data analysis used to justify using  
229 these alternate procedures should be described in a summary report that is maintained at the  
230 manufacturing facility.  
231

232 As an alternative, you can substitute the procedures described in the PDA Technical Report No.  
233 25, (see reference in footnote 8) to ensure that the blend is uniform and that the method meets or  
234 exceeds the criteria described above.  
235

## 236 237 **VI. VERIFICATION OF MANUFACTURING CRITERIA**

238  
239 You should complete the assessment of powder mix uniformity and correlation of stratified in-  
240 process dosage unit sampling development procedures before establishing the criteria and  
241 controls for routine manufacturing. We also recommend that you assess the normality and  
242 determine RSD from the results of stratified in-process dosage unit sampling and testing that  
243 were developed. The RSD value should be used to classify the testing results as either *readily*  
244 *pass* (RSD  $\leq$  4.0%), *marginally pass* (RSD  $\leq$  6.0%) or *inappropriate* for demonstration of batch  
245 homogeneity (RSD  $>$  6.0%). The procedures are discussed in the following sections:  
246

### 247 **A. In-Process Dosage Unit Sampling and Analysis**

248  
249 We recommend the following steps:  
250

- Carefully identify locations throughout the compression or filling operation to sample in-  
252 process dosage units. The sampling locations should also include significant process

## Contains Nonbinding Recommendations

Draft — Not for Implementation

253 events such as hopper changeover, filling or machine shutdown and the beginning and  
254 end of the compression or filling operation.<sup>16</sup> There should be at least 20 locations with 7  
255 samples each for a minimum total of 140 samples. These include periodic sampling  
256 locations and significant event locations.

- 257 • Sample at least 7 in-process dosage units from each sampling location.
- 258 • Assay at least 3 of the 7 and weight correct each result. (The number of samples should  
259 be specified and justified for a given product and process.)
- 260 • Conduct an analysis of the dosage unit stratified sampling data to demonstrate that the  
261 batch has a normal distribution of active ingredient. Indications of trends, bimodal  
262 distributions, or other forms of a distribution other than normal should be investigated. If  
263 these occurrences significantly affect your ability to ensure batch homogeneity, they  
264 should be corrected.
- 265 • Prepare a summary of this analysis. Potential investigation results along with a  
266 description of batch normality should be included in the summary. Submit this summary  
267 with the application as described in section VIII of this guidance.

268  
269 In addition to this analysis of batch normality, we recommend that you classify the test results as  
270 *readily pass* or *marginally pass* according to the following procedure:

### 271 272 **B. Criteria to Meet the *Readily Pass* Classification**

273  
274 For each separate batch, compare the test results to the following criteria:

- 275  
276 • For all individual results (for each batch  $n \geq 60$ ) the  $RSD \leq 4.0$  percent.
- 277  
278 • Each location mean is within 90.0 percent to 110.0 percent of target strength.
- 279  
280 • All individual results are within the range of 75.0 percent to 125.0 percent of target  
281 strength.

282  
283 If your test results meet these criteria, they are classified as *readily pass* and you can start routine  
284 batch testing using the Standard Verification Method (SVM) described in section VII. If your  
285 test results fail to meet these criteria, we recommend that you compare the results with the  
286 *marginally pass* criteria described below.

### 287 288 **C. Criteria to Meet the *Marginally Pass* Classification**

289  
290 If your dosage unit test results fail to meet the criteria for the *readily pass* classification, you  
291 should assay the remaining dosage units (all 7 units per location) and compare the test results to  
292 the following criteria:

---

<sup>16</sup> The beginning and end samples are taken from dosage units that would normally be included in the batch.

## ***Contains Nonbinding Recommendations***

*Draft — Not for Implementation*

- 293
- 294
- For all individual results (for one batch  $n \geq 140$ ) the  $RSD \leq 6.0$  percent.
- 295
- Each location mean is within 90.0 percent to 110.0 percent of target strength.
- 296
- All individual results are within the range of 75.0 percent to 125.0 percent of target
- 297
- strength.
- 298
- 299

300

301 If your test results meet these criteria, results can be classified as *marginally pass*. If your

302 samples do not meet these criteria, we recommend that you investigate the failure, find justified

303 and assignable cause(s), correct the deficiencies, and repeat the powder mix homogeneity

304 assessment, in-process dosage unit sampling correlation, and initial criteria establishment

305 procedures. The disposition of batches that have failed the *marginally pass* criteria is outside the

306 scope of this guidance.

### **D. Sample Locations for Routine Manufacturing**

307

308

309

310 We recommend that you prepare a summary of the data analysis from the powder mix

311 assessment and stratified sample testing. From the data analysis, you should establish the

312 stratified sample locations for routine manufacturing, taking into account significant process

313 events and their effect on in-process dosage unit and finished dosage unit quality attributes. You

314 should identify at least 10 sampling locations during capsule filling or tablet compression to

315 represent the entire routine manufacturing batch.

## **VII. ROUTINE MANUFACTURING BATCH TESTING METHODS**

316

317

318

319

320 We recommend that you evaluate the routine manufacturing batches against the following

321 criteria after completing the procedures described above to assess the adequacy of the powder

322 mix and uniform content in finished dosage form.

323

324 These routine manufacturing batch-testing methods include the Standard Criteria Method (SCM)

325 and the Marginal Criteria Method (MCM). The SCM consists of two stages, each with the same

326 *accept/reject* criteria. The second of the two stages recommends using a larger sample size to

327 meet these criteria. The MCM uses *accept/reject* criteria that are different from the SCM.

328

329 If the batch data fail to conform to the SCM criteria, we recommend continued sampling and

330 testing to intensified criteria (MCM). Both verification methods and the procedures for

331 switching from one to the other are detailed below and in the flow chart in Attachment 2.

### **A. Standard Criteria Method (SCM)**

332

333

334

335 We recommend using the SCM verification method when either of the following conditions is

336 met:

- Results of establishing initial criteria are classified as *readily pass*.
- 337

## ***Contains Nonbinding Recommendations***

*Draft — Not for Implementation*

338  
339  
340  
341  
342  
343  
344  
345  
346  
347  
348  
349  
350  
351  
352  
353  
354  
355  
356  
357  
358  
359  
360  
361  
362  
363  
364  
365  
366  
367  
368  
369  
370  
371  
372  
373  
374  
375  
376  
377  
378  
379  
380  
381  
382

- Results of testing to the MCM pass the criteria for switching to the SCM (see section C below).

The SCM should meet the same criteria using a different number of sample test results as described below:

### *1. Stage 1 Test*

To perform the stage 1 test, we recommend that you (1) collect at least 3 dosage units from each sampling location, (2) assay 1 dosage unit from each location, (3) weight correct the results, and (4) compare the results with the following criteria:

- RSD of all individual results ( $n \geq 10$ )  $\leq 5.0$  percent.
- Mean of all results is 90.0 percent to 110.0 percent of target assay.

If the results pass these criteria and the adequacy of mix and uniformity of dosage unit content for the batch are adequate, you can use the SCM for the next batch. If test results fail stage 1 criteria, you should conduct extended testing to stage 2 acceptance criteria.

### *2. Stage 2 Test*

To perform the stage 2 test, we recommend that you assay the remaining two dosage units (from stage 1) for each sampling location and compute the mean and RSD of data combined from both stage 1 and stage 2. Compare the results with the following criteria:

- For all individual results ( $n \geq 30$ ) the RSD  $\leq 5.0$  percent.
- Mean of all results is 90.0 percent to 110.0 percent of target assay.

If your results pass these criteria, the adequacy of mix and uniformity of content for the batch are adequate and you can use stage 1 of SCM for the next batch. If test results fail the criteria, use the MCM described in the next section.

## **B. Marginal Criteria Method (MCM)**

After powder mix assessment, in-process dosage unit stratified sampling correlation and initial criteria establishment, we recommend that you use the MCM when either of the following conditions is met:

- Results of initial criteria establishment qualified as *marginally pass*.
- Results of initial criteria establishment qualified as *readily pass* or a batch was tested according to SCM and the test results failed both stage 1 and stage 2 criteria.

## ***Contains Nonbinding Recommendations***

*Draft — Not for Implementation*

383  
384 Then, we recommend you use the weight-corrected results from the stage 2 SCM analysis and  
385 compare this with the MVM criteria:

- 386  
387
  - For all individual results ( $n \geq 30$ ) the RSD  $\leq 6.0$  percent.  
388
  - Mean of all results is 90.0 percent to 110.0 percent of target assay.

390  
391 We recommend that all results from analysis of any remaining location samples be computed  
392 with the stage 2 SCM data. No test results should be removed from the analysis. If the test  
393 results pass these criteria, the adequacy of mix and uniformity of content for the batch are  
394 adequate. We recommend that you continue to test routine manufacturing batches with MCM  
395 criteria. If the test results fail the criteria, you should no longer use the verification testing  
396 methods to ensure adequacy of mixing or uniformity of content until you investigate the failure  
397 (per 21 CFR 211.192) to establish justified assignable cause(s), take necessary corrective actions  
398 and repeat the powder mix assessment, stratified sample correlation, and initial criteria  
399 establishment procedures.

### 400 401 **C. Switching to Standard Test Method from Marginal Test Method**

402  
403 It is appropriate to switch to the SCM when the following criterion is met:

- 404  
405
  - Five consecutive batches pass the MCM criteria and result in RSD  $\leq 5.0$  percent

## 406 407 408 **VIII. REPORTING THE USE OF STRATIFIED SAMPLING**

### 409 410 **A. Applications Not Yet Approved**

411  
412 This section refers to the scientific data analysis and other information that should be submitted  
413 to an NDA or ANDA. Information submitted in the application should include summary reports  
414 and scientific analyses or statements about the method being used. The raw data collected to  
415 support using this method should be maintained at the manufacturing site.

416 We recommend that you provide the following information in the Manufacturing Process and  
417 Process Controls section of the application (CTD<sup>17</sup> 3.2.P.3.3).

- 418  
419
  - Statement that the methods in this guidance are being used to demonstrate the adequacy  
420 of powder mix or a description of alternative methods that demonstrate the adequacy of  
421 the powder mix  
422
  - Summary of data analysis from the powder mix assessment and from stratified sample  
423 testing

---

<sup>17</sup> *MAQ: The CTD – Quality*, one in a series of guidances that provide recommendations for applicants preparing the Common Technical Document for the Registration of Pharmaceuticals for Human Use (CTD) for submission to the FDA.

## ***Contains Nonbinding Recommendations***

*Draft — Not for Implementation*

424 • Summary of the in-process dosage unit stratified sampling data analysis demonstrating a  
425 normal distribution of active ingredient in the batch

426 • Summary of the powder mix sampling data analysis demonstrating that it met the  
427 minimum criteria for validation and establishing initial criteria  
428

429 We recommend that you provide the following information in the Drug Product Specification  
430 section of the application (CTD 3.2.P.4.1):  
431

432 • Statement in the product specification stating that the methods in this guidance are being  
433 used to demonstrate finished product uniformity of content or a description of alternative  
434 methods used to demonstrate finished product uniformity of content  
435

436 We also recommend that you provide the following information in the Pharmaceutical  
437 Development Information section of the application (CTD 3.2.P.2.2):  
438

439 • Summary of data analysis for correlation of in-process dosage unit stratified sampling  
440 with finished product uniformity of content  
441

442 • Summary of data analysis for correlation of powder mix uniformity with in-process  
443 dosage unit stratified sampling  
444

### **B. Postapproval Change**

445  
446  
447 If you plan on changing the existing controls for adequacy of mix and uniformity of content to  
448 the methods described in this guidance, the change should be considered a minor change as  
449 described in the postapproval changes guidance.<sup>18</sup> We recommend you provide a notice of the  
450 change in the next annual report along with the information indicated in section A, above. The  
451 raw data collected to support changes can be maintained at the manufacturing site.

---

<sup>18</sup> FDA's guidance for industry on *Changes to an Approved NDA or ANDA*.

## Contains Nonbinding Recommendations

Draft — Not for Implementation

452  
453  
454  
455  
456  
457  
458  
459  
460  
461  
462  
463  
464  
465  
466  
467  
468  
469  
470  
471  
472  
473  
474  
475  
476  
477  
478  
479  
480  
481  
482  
483  
484  
485  
486

### GLOSSARY

**Absolute** as used to define the acceptable range (+/- 10%) in which individual blend sample values must fall and which is independent of the value of the mean. *For example, if the mean of all blend samples is 95.0%, the absolute range is 85.0% to 105.0%, (not 95.0% +/- 9.5%).*

**Exhibit Batches** refer to any batch submitted in support of an NDA or ANDA. This includes bioequivalence, test, and commercial production batches of a drug product.

**In-process dosage unit** is a capsule or tablet as it is formed in the manufacturing process before it is coated or packaged.

**RSD** is relative standard deviation;  $RSD = [(standard\ deviation)/(mean)] \times 100\%$ .

**Significant event** is any operation during solid dosage production process that can affect the integrity of the in-process materials and, hence, their quality attributes. Transferring powder from a blender to a bin or from the bin to a hopper are two examples of significant events in the blending and compression process.

**Stratified sampling** is the process of collecting a representative sample by selecting units deliberately from various identified locations within a lot or batch, or from various phases or periods of a process to obtain a sample dosage unit that specifically targets locations throughout the compression/filling operation that have a higher risk of producing failing results in the finished product uniformity of content.

**Target assay** is the intended strength or intended amount of active ingredient in the dosage unit.

**Validation batch** is a batch manufactured and tested to verify the proposed routine manufacturing process controls are adequate.

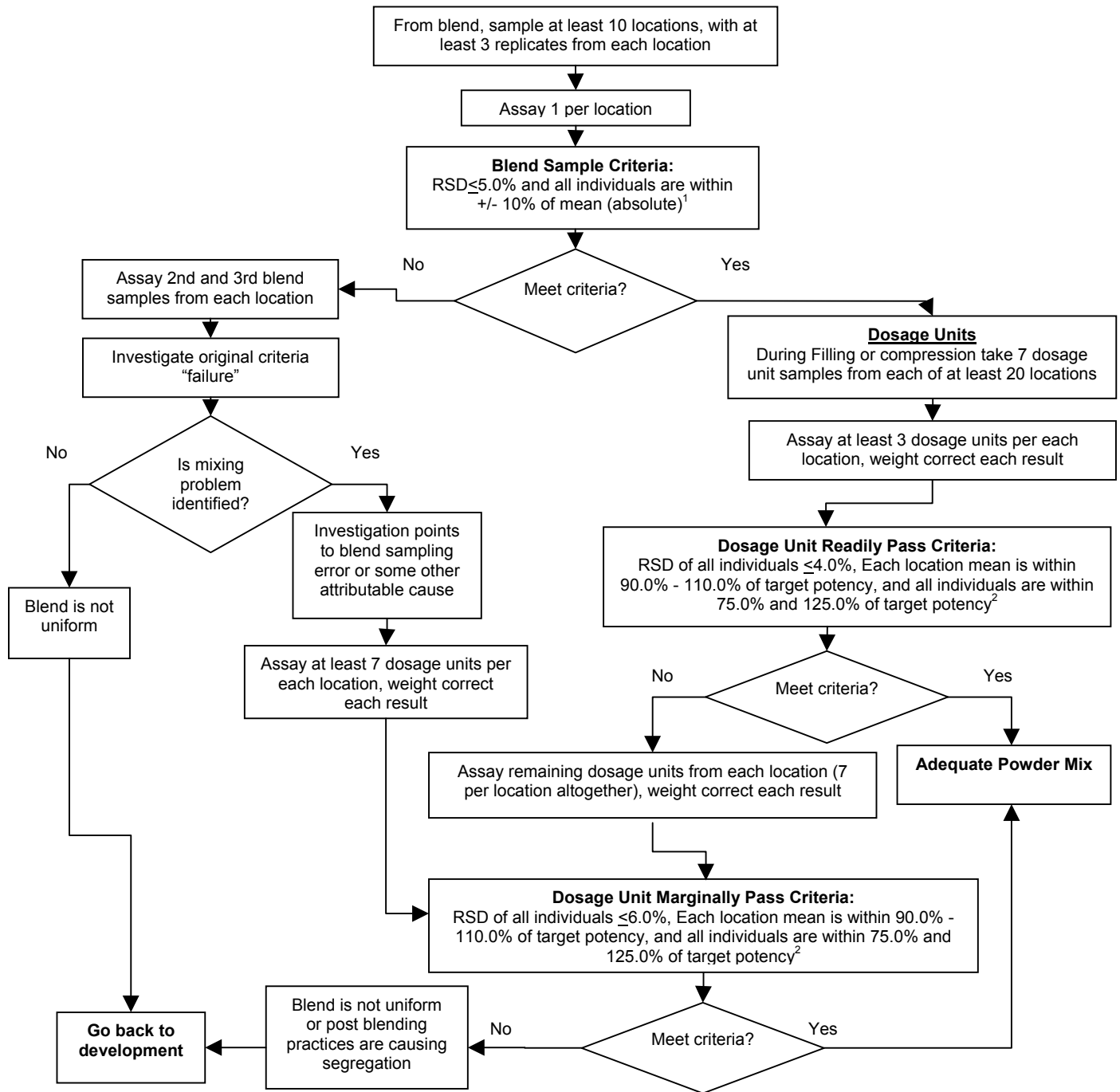
**Weight correct** is a mathematical correction to eliminate the effect of potentially variable tablet weight on measurement of mix adequacy. *For example, a tablet with a strength of 19.4 mg and weight of 98 mg =  $19.4 \div 98 = 0.198$  mg/mg. Label claim is 20 mg per each 100 mg tablet, so the weight corrected result is  $0.198 \div 0.20 * 100 = 99\%$  of target blend assay.*



**Contains Nonbinding Recommendations**

*Draft — Not for Implementation*

**ATTACHMENT 1: VERIFICATION OF MANUFACTURING CRITERIA**



<sup>1</sup> Examples of “mean +/- 10% (absolute)” are: If the mean strength = 95%, then the interval is 95% +/- 10%; thus, all individuals must fall within 85.0% to 105.0%. If the mean strength = 103.0%, then the interval is 103.0% +/- 10.0%; thus all individuals must fall within 93.0% to 113.0%.

<sup>2</sup> When comparing individual dosage units to 75.0% - 125.0% of target strength, use the *as is* results (not corrected for weight).

**Contains Nonbinding Recommendations**

*Draft — Not for Implementation*

**ATTACHMENT 2: ROUTINE MANUFACTURING BATCH TESTING**

527  
528  
529  
530  
531  
532  
533  
534  
535  
536

Before using this chart to demonstrate adequacy of mix and content uniformity during routine manufacture conduct assess the powder mix, stratified sample correlation and establishes initial criteria. Identify at least 10 sampling locations during filling or compression to represent the entire batch. Remove 3 or more dosage units at each sampling location.

