TOPICAL AND TRANSDERMAL DRUG PRODUCTS—PRODUCT QUALITY TESTS

I. INTRODUCTION

Drug products topically administered via the skin fall into two general categories: those applied to achieve local action and those to achieve systemic effects. Local action can occur at or on the surface of the skin (the stratum corneum) and also in the epidermis and/or dermis. Locally acting drug products include creams, gels, ointments, pastes, suspensions, lotions, foams, sprays, aerosols, and solutions. Creams, ointments, and gels are generally referred to as semisolid dosage forms. Drug products applied to the skin to achieve systemic effects are referred to as self-adhering transdermal patches or transdermal drug delivery systems (TDS).

Quality tests with procedures and acceptable criteria for both types of topically administered drug products can be divided into those that assess general quality attributes and those that assess performance. The former include identification, assay (strength), content uniformity, pH, microbial limits, and minimum fill. The latter assess drug release from the finished dosage form. For locally acting topical drug products, a product performance test exists only for semisolid formulations. TDS are physical devices that are applied to the skin and vary in their composition and method of fabrication. They release their active ingredients by different mechanisms. Several product performance tests are available to assess in vitro drug release from TDS. Performance tests considered for topically applied products may also be applicable to drug products of similar composition when administered by other routes of administration, e.g., ophthalmic drug products.

II. GLOSSARY OF TERMS

Definitions of topical drug products, brief information about their manufacture, and a glossary of dosage form names can be found in the general information chapter Pharmaceutical Dosage Forms (1151).
Absorption Bases—This class of bases may be divided into two groups: bases that permit the incorporation of aqueous solutions with the formation of a water-in-oil emulsion (e.g., Hydrophilic Petrolatum and Lanolin, both USP), and water-in-oil emulsions that permit the incorporation of additional quantities of aqueous solutions (e.g., Lanolin, USP). Absorption bases also are useful as emollients.

Choice of Base—The choice of an ointment base depends on many factors, such as the action desired, the nature of the medicament to be incorporated and its bioavailability and stability, and the requisite shelf life of the finished product. In some cases, it is necessary to use a base that is less than ideal in order to achieve the stability required. Drugs that hydrolyze rapidly, for example, are more stable in hydrocarbon bases than in bases that contain water, even though they may be more effective in the latter.

Collodion—Collodion (pyroxylin solution; see USP monograph Collodion) is a solution of nitrocellulose in ether and acetone, sometimes with the addition of alcohol. As the volatile solvents evaporate, a dry celluloid-like film is left on the skin. Because the medicinal use of a collodion depends on the formation of a protective film, the film should be durable, tenacious in adherence, flexible, and occlusive.

Creams—Creams are semisolid dosage forms that contain one or more drug substances dissolved or dispersed in a suitable base. This term traditionally has been applied to semisolids that possess a relatively soft, spreadable consistency formulated as either water-in-oil or oil-in-water emulsions. However, more recently the term has been restricted to products consisting of oil-in-water emulsions or aqueous microcrystalline dispersions of long-chain fatty acids or alcohols that are water washable and more cosmetically and aesthetically acceptable.

Emulsions—Emulsions are viscid multiphase systems in which one or more liquids are dispersed throughout another immiscible liquid in the form of small droplets. When oil is the dispersed phase and an aqueous solution is the continuous phase, the system is designated an oil-in-water emulsion. Conversely, when water or an aqueous solution is the dispersed phase and oil or oleaginous material is the continuous phase, the system is designated a water-in-oil emulsion. Emulsions are stabilized by emulsifying agents that prevent coalescence, the merging of small droplets into larger droplets and, ultimately, into a single separated phase. Emulsifying agents (surfactants) act by concentrating at the interface between the immiscible liquids, thereby providing a physical barrier that reduces the tendency for coalescence. Surfactants also reduce the interfacial tension between the phases, facilitating the formation of small droplets upon mixing. The term emulsion is not used if a more specific term is applicable, e.g., cream or ointment.

Foams—Foams are emulsified systems packaged in pressurized containers or special dispensing devices that contain dispersed gas bubbles, usually in a liquid continuous phase, that when dispensed have a fluffy, semisolid consistency.

Gels—Gels (sometimes called jellies) are semisolid systems that consist of either suspensions composed of small inorganic particles or large organic molecules interpenetrated by a liquid. When the gel mass consists of a network of small discrete particles, the gel is classified as a two-phase system (e.g., Aluminum Hydroxide Gel, USP). In a two-phase system, if the particle size of the dispersed phase is relatively large, the gel mass is sometimes referred to as a magma (e.g., Bentonite Magma, NF). Both gels and magmas may be thixotropic, forming semisolids after standing and becoming liquid when agitated. They should be shaken before use to ensure homogeneity and should be labeled to that effect (see Topical Suspensions,
Single-phase gels consist of organic macromolecules uniformly distributed throughout a liquid with no apparent boundary between the dispersed macromolecule and liquid.

**Hydrocarbon Bases**—Hydrocarbon bases, known also as oleaginous ointment bases, are represented by White Petrolatum and White Ointment (both USP). Only small amounts of an aqueous component can be incorporated into these bases. Hydrocarbon bases keep medicaments in prolonged contact with the skin and act as occlusive dressings. These bases are used chiefly for their emollient effects and are difficult to wash off. They do not “dry out” or change noticeably on aging.

**Lotions**—Although the term lotion may be applied to a solution, lotions usually are fluid, somewhat viscid emulsion dosage forms for external application to the skin. Lotions share many characteristics with creams. See Creams, Topical Solutions, and Topical Suspensions, herein.

**Ointments**—Ointments are semisolids intended for external application to the skin or mucous membranes. They usually contain less than 20% water and volatiles and more than 50% hydrocarbons, waxes, or polyols as the vehicle. Ointment bases recognized for use as vehicles fall into four general classes: hydrocarbon bases; absorption bases; water-removable bases; and water-soluble bases. Each therapeutic ointment possesses as its base one of these four general classes.

**Ophthalmic Ointments**—Ophthalmic ointments are semisolids for application to the eye. Special precautions must be taken in the preparation of ophthalmic ointments. They are manufactured from sterilized ingredients under rigidly aseptic conditions, must meet the requirements under Sterility Tests (71), and must be free of large particles. The medicinal agent is added to the ointment base either as a solution or as a micronized powder.

**Pastes**—Pastes are semisolid dosage forms that contain a high percentage (often >50%) of finely dispersed solids with a stiff consistency and intended for topical application. One class is made from a single-phase aqueous gel (e.g., Carboxymethylcellulose Sodium Paste, USP). The other class, the fatty pastes (e.g., Zinc Oxide Paste, USP), consists of thick, stiff ointments that do not ordinarily flow at body temperature and therefore serve as protective coatings over the areas to which they are applied.

**Powders**—Powders are solids or mixture of solids in a dry, finely divided state for external (or internal) use.

**Sprays**—Sprays are products formed by the generation of droplets of solution containing dissolved drug for application to the skin or mucous membranes. The droplets may be formed in a variety of ways but generally result when a liquid is forced through a specially designed nozzle assembly. One example of a spray dosage form is a metered-dose topical transdermal spray that delivers a precisely controlled quantity of solution or suspension on each activation.

**Transdermal Delivery Systems (TDS)**—TDS are self-contained, discrete dosage forms that, when applied to intact skin, are designed to deliver the drug(s) through the skin to the systemic circulation. Systems typically comprise an outer covering (barrier), a drug reservoir that may have a drug release-controlling membrane, a contact adhesive applied to some or all parts of the system and the system/skin interface, and a protective liner that is removed before the patient applies the system. The dose of these systems is defined in terms of the release rate of the drug(s) from the system and surface area of the patch and is expressed as mass per unit time for a given surface area. With these drug products, the skin typically is the rate-controlling membrane for the drug input into the body. The total duration of drug release from the system and system surface area also may be stated.
TDS work by diffusion: the drug diffuses from the drug reservoir, directly or through the rate-controlling membrane and/or contact adhesive if present, and then through the skin into the general circulation. Typically, modified-release systems are designed to provide drug delivery at a constant rate so that a true steady-state blood concentration is achieved and maintained until the system is removed. Following removal of the system, blood concentration declines at a rate consistent with the pharmacokinetics of the drug.

**Topical Aerosols**—Topical aerosols are products that are packaged under pressure. The active ingredients are released in the form of fine liquid droplets or fine powder particles upon activation of an appropriate valve system. A special form is a metered-dose aerosol that delivers an exact volume (dose) per each actuation.

**Topical Solutions**—Topical solutions are liquid preparations that usually are aqueous but often contain other solvents such as alcohol and polyls that contain one or more dissolved chemical substances intended for topical application to the skin or, as in the case of Lidocaine Oral Topical Solution, USP, to the oral mucosal surface.

**Topical Suspensions**—Topical suspensions are liquid preparations that contain solid particles dispersed in a liquid vehicle intended for application to the skin. Some suspensions labeled as lotions fall into this category.

**Water-removable Bases**—Water-removable bases are oil-in-water emulsions (e.g., Hydrophilic Ointment, USP) and are more correctly called creams (see Creams, above). They also are described as “water-washable” because they may be readily washed from the skin or clothing with water, an attribute that makes them more acceptable for cosmetic purposes. Some medicaments may be more effective in these bases than in hydrocarbon bases. Other advantages of the water-removable bases are that they can be diluted with water and that they favor the absorption of serous discharges in dermatological conditions.

**Water-soluble Bases**—This group of so-called “greaseless ointment bases” comprises water-soluble constituents. Polyethylene Glycol Ointment, NF, is the only pharmacopeial preparation in this group. Bases of this type offer many of the advantages of the water-removable bases and, in addition, contain no water-insoluble substances such as petrolatum, anhydrous lanolin, or waxes. They are more correctly called gels (see Gels, above).

### III. PRODUCT QUALITY TESTS FOR ALL TOPICALLY APPLIED DRUG PRODUCTS

Universal tests are listed below and should be applied to all topically applied drug products.

**Description**—A qualitative description of the dosage form should be provided. The acceptance criteria should include the final acceptable appearance. If color changes during storage, a quantitative procedure may be appropriate. It specifies the content or the label claim of the article.

**Identification**—Identification tests are discussed in Procedures under Tests and Assays in the General Notices and Requirements. Identification tests should establish the identity of the drug or drugs present in the article and should discriminate between compounds of closely related structure that are likely to be present. Identity tests should be specific for the drug substances. The most conclusive test for identity is the infrared absorption spectrum (see Spectrophotometry and Light-Scattering and Spectrophotometric Identification Tests). If no suitable infrared spectrum can be obtained, other analytical techniques can be used. Near infrared (NIR) or Raman spectrophotometric methods also could be acceptable for the sole identification of the drug product formulation (see Near-infrared Spectrophotometry and Raman Spectroscopy). Identification solely by a single chromatographic retention time is...
not regarded as specific. However, the use of two chromatographic procedures for which the separation is based on different principles or a combination of tests in a single procedure can be acceptable. See Chromatography (621) and Thin-layer Chromatographic Identification Test (201).

**Assay**—A specific and stability-indicating test should be used to determine the strength (content) of the drug product. See Antibiotics—Microbial Assays (81), Chromatography (621), or Assay for Steroids (351). In cases when the use of a nonspecific assay is justified (e.g., Titrimetry (541)), other supporting analytical procedures should be used to achieve overall specificity. A specific procedure should be used when there is evidence of excipient interference with the nonspecific assay.

**Impurities**—Process impurities, synthetic by-products, and other inorganic and organic impurities may be present in the drug substance and excipients used in the manufacture of the drug product. These impurities are controlled by the drug substance and excipients monographs. Organic impurities arising from the degradation of the drug substance and those arising during the manufacturing process of the drug product should be monitored.

In addition to the universal tests listed above, the following specific tests may be considered on a case-by-case basis.

**Physicochemical Properties**—These are properties such as pH (791), Viscosity (911), and Specific Gravity (841).

**Uniformity of Dosage Units**—This test is applicable for TDS and for dosage forms packaged in single-unit containers. It includes both the mass of the dosage form and the content of the active substance in the dosage form. The test can be performed by either content uniformity or weight variation (see Uniformity of Dosage Units (905)).

**Water Content**—A test for water content should be included when appropriate (see Water Determination (921)).

**Microbial Limits**—The type of microbial test(s) and acceptance criteria should be based on the nature of the drug substance, method of manufacture, and the intended use of the drug product. See Microbiological Examination of Nonsterile Products: Microbial Enumeration Tests (61) and Microbiological Examination of Nonsterile Products: Tests for Specified Microorganisms (62).

**Antimicrobial Preservative Content**—Acceptance criteria for preservative content in multidose products should be established. They should be based on the levels of antimicrobial preservative necessary to maintain the product’s microbiological quality at all stages throughout its proposed usage and shelf life (see Antimicrobial Effectiveness Testing (51)).

**Antioxidant Preservative Content**—If antioxidant preservatives are present in the drug product, tests of their content normally should be determined.

**Sterility**—Depending on the use of the dosage form (e.g., ophthalmic preparations), sterility of the product should be demonstrated as appropriate (see Sterility Tests (71)).

### III. a. PRODUCT QUALITY TESTS FOR TOPICAL DRUG PRODUCTS INTENDED FOR LOCAL ACTION

Additional tests for locally acting topical dosage forms are provided in this section. Some of these may also be used for some nitroglycerin semisolids.

**Viscosity**—Rheological properties such as viscosity of semisolid dosage forms can influence their drug delivery. Viscosity may directly influence the diffusion rate of a drug at the microstructural level. Yet semisolid drug products with comparatively high viscosity still can exhibit high diffusion rates when compared to semisolid products of comparatively lower viscosity. These obser-
vations emphasize the importance of rheologic properties of semisolid dosage forms, specifically viscosity, on drug product performance.

Depending on its viscosity, the rheological behavior of a semisolid drug product may affect its application to treatment site(s) and consistency of treatment and thus the delivered dose. Therefore, maintaining reproducibility of a product’s flow behavior at the time of release is an important product manufacturing control that manufacturers should use to maintain and demonstrate batch-to-batch consistency. Most semisolid dosage forms, when sheared, exhibit non-Newtonian behavior. Structures formed within semisolid drug products during manufacturing can show a wide range of behaviors, including shear thinning viscosity, thixotropy, and structural damage that may be irreversible or only partially reversible. In addition, the viscosity of a semisolid dosage form is highly influenced by factors such as the inherent physical structure of the product, product sampling technique, sample temperature for viscosity testing, container size and shape, and specific methodology employed in the measurement of viscosity.

A variety of methods can be used to characterize the consistency of semisolid dosage forms, including penetrometry, viscometry, and rheometry. With all methods significant attention is warranted to the shear history of the sample. For semisolids, viscometer geometries typically fall into the following categories: concentric cylinders, cone-plates, and spindles. Concentric cylinders and spindles typically are used for more fluid, flowable semisolid dosage forms. Cone-plate geometries are more typically used when the sample size is small or the test samples are more viscous and less flowable.

When contemplating what viscosity parameter(s) to test, one must consider the properties of the semisolid drug product both “at rest” (in its container) and as it is sheared during application. The rheological properties of the drug product at rest can influence the product’s shelf life, and its properties under extensive shear can influence its spreadability and, therefore, its application rate that will affect the safety and efficacy of the drug product. Further, although it is necessary to precisely control the temperature of the test sample during the viscosity measurement, one should link the specific choice of the temperature to the intended use of the drug product (e.g., skin temperature for external application effects).

Because semisolid dosage forms frequently display non-Newtonian flow properties, formulators should give close attention to the shear history of the sample being tested, such as the shear applied during the filling operation, shear applied dispensing the product from its container, and shear when introducing the sample into the viscometer. The point of reemphasizing this aspect is that considerable variability and many failures to meet specifications can be directly attributed to a lack of attention to this detail rather than a change of viscosity (or flow properties) of the drug product.

Tube (Content) Uniformity—Tube uniformity is the degree of uniformity of the amount of active drug substance among containers, i.e., tubes containing multiple doses of the semisolid topical product. The uniformity of dosage is demonstrated by assay of top, middle, and bottom samples (typically 0.25–1.0 g) obtained from a tube cut open to withdraw respective samples for drug assay. Various topical semisolid products may show some physical separation at accelerated storage temperatures because emulsions, creams, and topical lotions are prone to mild separation due to the nature of the vehicle.

The following procedure should be followed for testing tube uniformity of semisolid topical dosage forms:

1. Carefully remove or cut off the bottom tube seal and make a vertical cut up the face of the tube. Then carefully cut the tube around the upper rim and pry open the two “flaps” to expose the semisolid.
2. At the batch release and/or designated stability time point remove and test 0.25- to 1.0-g samples from the top, middle, and bottom of a tube. If assay values for those tests are within 90.0%–110.0% of the labeled amount of active drug, and the relative standard-deviation (RSD) is not more than 6%, then the results are acceptable.

3. If at least one value of the testing described above is outside 90.0%–110.0% of the labeled amount of drug and none is outside 85.0%–115.0% and/or the RSD is more than 6%, then test an additional three randomly sampled tubes using top, middle, and bottom samples as described. Not more than 3 of the 12 determinations should be outside the range of 90%–110.0% of the labeled amount of drug, none should be outside 85.0%–115.0%, and the RSD should not be not more than 7%.

4. For very small tubes (e.g., 5 g or less), test only top and bottom samples, and all values should be within the range of 90.0%–110.0% of the labeled amount of drug.

**pH**—When applicable, semisolid drug products should be tested for pH at the time of batch release and designated-stability test time points for batch-to-batch monitoring. Because most semisolid dosage forms contain very limited quantities of water or aqueous phase, pH measurements may be warranted only as a quality control measure, as appropriate.

**Particle Size**—Particle size of the active drug substance in semisolid dosage forms is determined and controlled at the formulation-development stage. When applicable, semisolid drug products should be tested for any change in the particle size or habit of the active drug substance at the time of batch release and designated stability test time points (for batch-to-batch monitoring) that could compromise the integrity and/or performance of the drug product, as appropriate.

**Ophthalmic Dosage Forms**—Ophthalmic dosage forms must meet the requirements of Sterility Tests (71). If the specific ingredients used in the formulation do not lend themselves to routine sterilization techniques, ingredients that meet the sterility requirements described under Sterility Tests (71), along with aseptic manufacture, may be employed. Ophthalmic ointments must contain a suitable substance or mixture of substances to prevent growth of, or to destroy, microorganisms accidentally introduced when the container is opened during use, unless otherwise directed in the individual monograph or unless the formula itself is bacteriostatic (see Added Substances under Ophthalmic Ointments (771)). The finished ointment must be free from large particles and must meet the requirements for Leakage and for Metal Particles in Ophthalmic Ointments (771). The immediate containers for ophthalmic ointments shall be sterile at the time of filling and closing. It is mandatory that the immediate containers for ophthalmic ointments be sealed and tamper-proof so that sterility is assured at time of first use.

**III. b. PRODUCT QUALITY TESTS FOR TRANSDERMAL DRUG PRODUCTS**

The product quality tests for TDS drug products include assay, content uniformity, homogeneity, and adhesive.

**Uniformity of Dosage Units**—This test is applicable for TDS and for dosage forms that are packaged in single-unit containers. It includes both the mass of the dosage form and the content of the active substance in the dosage form. It can be done by either content uniformity or weight variation (see Uniformity of Dosage Units (905)).

Assay of excipient(s) critical to the performance of the product should be considered; e.g., residual solvent content can affect certain patches.
**Adhesive Test**—Three types of adhesive tests generally are performed to ensure the performance of the TDS dosage forms. These are the peel adhesion test, tack test, and shear strength test. The peel adhesion test measures the force required to peel away a transdermal patch attached to a stainless steel test panel substrate at panel angles of 90° or 180° following a dwell time of 1 minute and peel rate of 300 mm/minute.

The tack test is used to measure the tack adhesive properties of TDS dosage forms. With this test a probe touches the adhesive surface with light pressure, and the force required to break the adhesion after a brief period of contact is measured.

The shear strength or creep compliance test is a measure of the cohesive strength of TDS dosage forms. Two types of shear testing are performed: dynamic and static. During dynamic testing the TDS is pulled from the test panel at a constant rate. With the static test the TDS is subjected to a shearing force by means of a suspended weight.

**Leak Test**—A test that is discriminating and capable of detecting sudden drug release, such as leakage, from the TDS should be performed. Although form, fill, and seal TDS are more likely to display leak problems, all TDS should be checked for sudden drug release (dose dumping) during release testing of the dosage form.

**IV. PRODUCT PERFORMANCE TEST FOR TOPICAL DRUG PRODUCTS**

A performance test for topical drug products must have the ability to measure drug release from the finished dosage form. It must be reproducible and reliable, and although it is not a measure of bioavailability, the performance test must be capable of detecting changes in drug release characteristics from the finished product. The latter have the potential to alter the biological performance of the drug in the dosage form. Those changes may be related to active or inactive/inert ingredients in the formulation, physical or chemical attributes of the finished formulation, manufacturing variables, shipping and storage effects, aging effects, and other formulation factors critical to the quality characteristics of the finished drug product. Product performance tests can serve many useful purposes in product development and in post-approval drug product monitoring. They provide assurance of equivalent performance for products that have undergone postapproval raw material changes, relocation or change in manufacturing site, and other changes as detailed in the FDA's Guidance for Industry SUPAC-SS: Nonsterile Semisolid Dosage Forms: Scale-Up and Postapproval Changes: Chemistry, Manufacturing, and Controls; In Vitro Release Testing and In Vivo Bioequivalence Documentation (May 1997) (available at www.fda.gov/cder/guidance/1447fnl.pdf). In this general chapter, a USP performance test for semi-solid dosage forms to support batch release is considered. Details of the procedure are provided in the general chapter Topical and Transdermal Drug Products—Product Performance Tests (725). (proposed).

**V. IN VITRO DRUG RELEASE FROM SEMISOLID DOSAGE FORMS**

**V.a. THEORY**

The vertical diffusion cell (VDC) system is a simple, reliable, and reproducible means of measuring drug release from semisolid dosage forms. A thick layer (200–400 mg) of the test semisolid is placed in contact with a reservoir. Diffusive communication between the delivery system and the reservoir takes place through an inert, highly permeable support membrane. The membrane keeps the product and the receptor medium separate and distinct. Membranes are chosen to offer the least possible diffusional resistance and not to be rate controlling. Samples are withdrawn from the reservoir at various times. In
most cases, a 5- to 6-hour time period is all that is needed to characterize drug release from a semisolid, and when this is the case samples usually are withdrawn hourly.

After a short lag period, release of drug from the semisolid dosage form in the VDC system is kinetically describable by diffusion of a chemical out of a semi-infinite medium into a sink. The momentary release rate tracks the depth of penetration of the forming gradient within the semisolid. Beginning at the moment when the receding boundary layer’s diffusional resistance assumes dominance of the kinetics of release, the amount of the drug released, \( M \), becomes proportional to \( \sqrt{t} \) (where \( t \) = time) for solution, suspension, or emulsion semisolid systems alike. The momentary rate of release, \( \frac{dM}{dt} \), becomes proportional to \( 1/\sqrt{t} \), which reflects the slowing of drug release with the passage of time. The reservoir is kept large so that drug release is into a medium that remains highly dilute over the entire course of the experiment relative to the concentration of drug dissolved in the semisolid. In this circumstance drug release is said to take place into a diffusional sink.

When a drug is totally in solution within the dosage form, the amount of drug released as a function of time can be described by:

\[
M = \frac{2D_{0}Co}{\sqrt{\pi \cdot t}}
\]

where:
- \( M \) = amount of drug released into the sink per cm\(^2\)
- \( Co \) = drug concentration in releasing matrix
- \( D \) = drug diffusion coefficient through the matrix

A plot of \( M \) vs. \( \sqrt{t} \) will be linear with a slope of:

\[
2Co\sqrt{D/\pi}
\]

Equation 2 describes drug release when the drug is in the form of a suspension within the dosage form:

\[
M = \frac{2D_{m}Cs}{\sqrt{\pi \cdot t}}
\]

where:
- \( D_{m} \) = drug diffusion coefficient in the semisolid matrix
- \( Cs \) = drug solubility in the releasing matrix
- \( Q \) = total amount of the drug in solution and suspended in the matrix.

When \( Q \gg Cs \), Equation 2 simplifies to Equation 3.

\[
M = \frac{2D_{m}Cs}{\sqrt{\pi \cdot t}}
\]

A plot of \( M \) vs. \( \sqrt{t} \) will be linear with a slope of:

\[
\frac{2D_{m}Cs}{\pi}
\]

Coarse particles may dissolve so slowly that the moving boundary layer recedes to some extent behind the particles. That situation introduces noticeable curvature in the \( t \) plot because of a particle size effect. During release rate experiments, every attempt should be made to keep the composition of the formulation intact during the releasing period.

V. b. APPLICATION OF DRUG RELEASE

Drug release results can be utilized for purposes such as ensuring product sameness after SUPAC-SS-related changes or successive batch release comparisons. This is illustrated by the following example in which the initial drug batch is referred to as Reference Batch (R) and the changed or subsequent batch is referred to as Test Batch (T). The individual amount released from R is plotted vs. time, and the resulting slope is determined. These are the reference slopes (RS). The process is repeated to determine the test slopes (TS).
The T/R ratios are calculated for each Test to Reference Slope. This is facilitated if one creates a table where the TS are listed down the left side of the table and the RS are listed across the top of the table. The T/R ratios are then calculated and entered in the body of the table.

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<tr>
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<td>TS1</td>
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<td>TS1/RS4</td>
<td>TS1/RS5</td>
<td>TS1/RS6</td>
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After the T/R ratios have been calculated they are ordered from lowest to highest. The 8th and 29th T/R ratios are extracted and converted to percent (multiply by 100). To pass the first stage these ratios must fall within the range of 75%–133.33%.

If the results do not meet this criterion, the SUPAC-SS Guidance requires that four more tests of six cells each should be run, resulting in 12 additional slopes per product tested. The T/R ratios are calculated for all 18 slopes per product tested. All 324 individual T/R ratios are calculated and ordered lowest to highest. The 110th and the 215th ratios are evaluated against the specification of 75%–133.33%.

Third stage testing is not suggested.

**INTRODUCTION**

Topically applied drug products fall into two general categories: those applied to achieve local action and those applied to achieve systemic effects after absorption through the skin into the blood circulation. Local action can occur at or on the surface of the application site (e.g., stratum corneum, ocular epithelium), in the underlying tissues (e.g., epidermis and/or dermis) and on subcutaneous tissues (e.g., muscle or joint).

Topically applied drug products include, but are not restricted to: creams, gels, ointments, pastes, suspensions, lotions, foams, sprays, aerosols, solutions, and transdermal delivery systems (TDS, also known as patches). The definitions and descriptions of these dosage forms, and brief information on their composition and/or manufacturing process can be found in *Pharmaceutical Dosage Forms* (1151).

Procedures and acceptable criteria for testing topically administered drug products can be divided into those that assess general product quality attributes and those that assess product performance. The product quality attributes include: description, identification, assay (strength), impurities, physicochemical properties, uniformity of dosage units, water content, pH, apparent viscosity, microbial limits, antimicrobial preservative content, antioxidant preservative content, minimum fill (see *Minimum Fill* (755)), sterility, if applicable, and other tests that may be product specific. Product performance testing assesses drug release and other attributes that affect drug release from the finished dosage form. TDS are
physical devices that are applied to the skin and vary in their composition and method of fabrication. TDS release their active ingredients by different mechanisms. Several product performance tests are available to assess in vitro drug release from TDS (see Drug Release (724)).

**PRODUCT QUALITY TESTS FOR TOPICALLY APPLIED DRUG PRODUCTS**

**Universal Tests**

Universal tests (see ICH Guidance Q6A—Specifications: Test Procedures and Acceptance Criteria for New Drug Substances and New Drug Products: Chemical Substances, available at www.ich.org) are listed below and are applicable to all topically applied drug products.

**Description:** A qualitative description of the drug product should be provided. The acceptance criteria should include the final acceptable appearance of the finished dosage form, packaging and labeling. A visual examination should identify changes in color, adhesive migration (i.e., cold flow) for TDS, separations, crystallization, etc., that are specific to the drug product. The description should specify the content or the label claim of the article. This is not a compendial test but is part of the manufacturer’s specification for the drug product.

**Identification:** Identification tests are discussed in General Notices and Requirements, 5.40. Identification tests should establish the identity of the drug or drugs present in the article and should discriminate between compounds of closely related structures that are likely to be present. Identity tests should be specific for the drug substance(s) (e.g., infrared spectroscopy). Near infrared (NIR) or Raman spectrophotometric methods also could be acceptable for the identification of the drug product (see Near-Infrared Spectrophotometry (1119) and Raman Spectroscopy (1120)). Identification solely by a single chromatographic retention time is not specific. However, the use of two chromatographic procedures for which the separation is based on different principles or a combination of tests in a single procedure is generally acceptable (see Chromatography (621) and Thin-Layer Chromatographic Identification Test (201)).

**Assay:** A specific and stability-indicating test should be used to determine the strength (content) of the drug product. In cases when the use of a nonspecific assay (e.g., Titrimetry (541)) is justified, other supporting analytical procedures should be used to achieve overall specificity.

**Impurities:** Process impurities, synthetic by-products, residual solvents (see Residual Solvents (467)), elemental impurities (see Elemental Impurities—Limits (232) and Elemental Impurities—Procedures (233),1 and other inorganic and organic impurities may be present in the drug substance and excipients used in the manufacture of the drug product and should be assessed and controlled. Impurities arising from the degradation of the drug substance and those arising during the manufacturing process of the drug product should also be assessed and controlled.

**Specific Tests**

In addition to the universal tests listed above, the following specific tests should be considered on a case-by-case basis.

**Physicochemical Properties:** These are properties such as pH (791), apparent viscosity (see Non-Newtonian Rheology (912)2, Specific Gravity (841)), and peel adhesion. These properties are formulation dependent and should be tested when appropriate. Therefore, they are not included in compendial drug product monographs but are part of the manufacturer specification for the drug product.

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1 Proposed in Pharmacopeial Forum 36(1).
2 Proposed in Pharmacopeial Forum 34(6).
Uniformity of Dosage Units: This test is applicable for TDS and for dosage forms packaged in single-unit containers (see Uniformity of Dosage Units (905)).

Water Content: A test for water content should be included when appropriate (see Water Determination (921)). This test is generally formulation dependent. Therefore, it is not included in the compendial drug product monograph but is part of the manufacturer’s specification for the drug product.

Microbial Limits: Microbial examination of nonsterile drug products is performed according to the methods given in general chapters Microbiological Examination of Nonsterile Products: Microbial Enumeration Tests (61) and Microbiological Examination of Nonsterile Products: Tests for Specified Microorganisms (62), unless the formulation itself is demonstrated to have antimicrobial properties. Acceptance criteria for nonsterile pharmaceutical products based on total aerobic microbial count (TAMC) and total combined yeasts and molds count (TYMC) are given in Microbiological Examination of Nonsterile Products: Acceptance Criteria for Pharmaceutical Preparations and Substances for Pharmaceutical Use (1111).

Antimicrobial Preservative Content: Acceptance criteria for antimicrobial preservative content in multidose products should be established. They should be based on levels of antimicrobial preservative necessary to maintain the product’s microbiological quality at all stages throughout its proposed usage and shelf life (see Antimicrobial Effectiveness Testing (51)).

Antioxidant Preservative Content: If antioxidant preservatives are present in the drug product, tests of their content should be established unless oxidative degradation can be detected by another test method such as impurity testing. Acceptance criteria for antioxidant preservative content should be established. They should be based on the levels of antioxidant preservative necessary to maintain the product’s stability at all stages throughout its proposed usage and shelf life.

Sterility: Depending on the use of the dosage form (e.g. ophthalmic preparations, products that will be applied to open wounds or burned areas), sterility of the product should be demonstrated as appropriate (see Sterility Tests (71)).

pH: When applicable, semisolid drug products should be tested for pH at the time of batch release and at designated stability time points for batch-to-batch monitoring. Because some semisolid dosage forms contain very limited quantities of water or aqueous phase, pH measurements may not always be warranted.

This test is generally formulation dependent. Therefore, it is not included in the compendial drug product monograph but is part of the manufacturer’s specification for the drug product.

Particulate Size: The particle size of the active drug substance(s) in semisolid dosage forms is usually determined and controlled at the formulation development stage. However, semisolid drug products should be examined for evidence of particle size alteration (i.e., changes in particle form, size, shape, habit, or aggregation) of the active drug substance that may occur during the course of product processing and storage. Such examinations should be conducted at the time of batch release and at designated stability test time points for batch-to-batch monitoring because changes that are visually (macro- and microscopically) observable would likely compromise the integrity and/or performance of the drug product. The presence of particle aggregation of the active drug substance, generally observed as “graininess,” in a finished formulation should be determined. Changes in crystalline form (crystal type or habit) and gross changes in particle size over time caused by Ostwald ripening or electrostatically induced agglomeration will result in altered drug release, and therefore should be monitored. These types of testing are generally
formulation dependent. Therefore, such tests are not included in compendial monographs but are part of the manufacturer specification for the drug product.

Additionally, the presence of unintentional undissolved particles in semisolid topical dosage forms should be assessed by visual inspection of the product with the naked eye and/or suitable optical device.

There should be no particulate matter in any semisolid ophthalmic drug product at any time.

**SPECIFIC TESTS FOR OPHTHALMIC DOSAGE FORMS**

Ophthalmic dosage forms must meet the requirements of *Sterility Tests* (71). If the specific ingredients used in the formulation do not lend themselves to routine sterilization techniques, ingredients that meet the sterility requirements described under *Sterility Tests* (71), along with aseptic manufacture, may be employed. Multiple-use ophthalmic preparations must contain a suitable substance or mixture of substances to prevent growth of, or to destroy, microorganisms accidentally introduced during the use of the product (see *Added Substances* under *Ophthalmic Ointments* (771)), unless otherwise directed in the individual monograph or unless the formula itself is bacteriostatic and/or the delivery system promotes bacteriostasis. The finished ophthalmic preparation must be free from large particles and must meet the requirements for *Leakage* and for *Metal Particles* under *Ophthalmic Ointments* (771). The immediate containers for ophthalmic preparations shall be sterile at the time of filling and closing. It is mandatory that the immediate containers for ophthalmic preparations be sealed and tamper-proof so that sterility is ensured at the time of first use.

**SPECIFIC TESTS FOR TOPICALLY APPLIED SEMISOLID DRUG PRODUCTS**

**Apparent Viscosity**

Viscosity is a measure of a formulation’s resistance to flow and is an assessment of the rheological properties of the dosage form (e.g., semisolid dosage form). Because only Newtonian fluids possess a measurable viscosity that is independent of shear rate, semisolid pharmaceutical dosage forms which are non-Newtonian products exhibit an apparent viscosity.

The apparent viscosity of semisolid drug products should be tested at the time of batch release and initially at designated stability test time-points to set specifications for batch-to-batch and shelf life monitoring. Measurement procedures should be developed as outlined in *Non-Newtonian Rheology* (912). For semisolids that show thixotropy and/or irreversible changes in viscosity after shearing, specific attention should be given to sample preparation procedures to minimize variability in the measurement of apparent viscosity caused by variable shear histories (e.g., mixing speed and temperature, filling operation, sample handling). Furthermore, for some products, it may be warranted to have apparent viscosity specifications at more than one set of conditions (e.g., bulk in-process stage, final packaged product, high and low shear rates, different temperatures).

Apparent viscosity specifications based on data obtained during product development and shelf life testing should be established for semisolid drug products for batch release and throughout their proposed shelf life. For products undergoing post-approval changes (e.g., modification in the formulation, use of a different body-forming excipient or a change in the process), apparent viscosity testing should demonstrate product equivalence before and after the change(s).
For routine commercial batches, upon the establishment of acceptable apparent viscosity specifications during development, shelf life testing, and/or post-approval modifications of the formulation, apparent viscosity testing is performed at the time of batch release and is periodically monitored as part of an on-going stability program.

The apparent viscosity test is formulation and/or process dependent. Therefore, it is not included in compendial drug product monographs but is part of the manufacturer’s specification for the drug product. Furthermore, the specifications for apparent viscosity of semisolid dosage forms at batch release and during stability testing may be different. Although the apparent viscosity of the finished drug product at the time of batch release must conform to the product development specifications, for stability testing—the apparent viscosity specifications for the finished drug product should be based on statistical assessment of the product over its shelf life.

Uniformity in Containers

Topical semisolid products may show physical separation during manufacturing processes and during their shelf life. To ensure the integrity of a semisolid product, it is essential to evaluate its physicochemical properties and uniformity at the time of batch release and throughout its assigned shelf life.

PRODUCTS PACKAGED IN TUBES

Within-tube content uniformity can be assessed in the following manner.

For multiple-dose products in tubes that contain 5 g or more: Carefully remove or cut off the bottom tube seal and make a vertical cut from the bottom to the top of the tube. Carefully cut the tube around the upper rim, open the two flaps and lay the flaps open to expose the product.

Inspect the product visually for the presence of phase separation, change in physical appearance and texture, and other properties described in the product test for Description. If there is no observable phase separation or change in physical appearance and texture, and if the product meets the Description acceptance criteria, proceed as described below. If the product exhibits phase separation and/or change in physical appearance or texture, the product fails the tube content uniformity test.

Procedure 1

1. Using a single tube, after visually inspecting the product remove an amount of product, about 0.25 to about 1 g, from the top, middle, and bottom portions of the tube. The sample size should be sufficient for at least one assay determination of the active ingredient(s). Carry out the assay test for the active ingredient(s) in each portion of the product, and evaluate the test results using Acceptance criteria A.

2. If the product fails Acceptance criteria A, test three additional tubes from the same batch following step 1 described above, and evaluate all 12 test results using Acceptance criteria B.

Procedure 2

1. Using two tubes, after visually inspecting the product remove an amount of product, about 0.25 g to about 1 g, from the top, middle and bottom portions of each tube. The sample size should be sufficient for at least one assay determination of the active ingredient(s). Carry out the assay test for the active ingredient(s) in each portion of the tube, and evaluate the test results using Acceptance criteria A.

2. If the product fails Acceptance criteria A, test two additional tubes from the same batch following step 1 described above.
described above and evaluate all 12 test results using 
Acceptance criteria B.

**Tube (container) content uniformity test acceptance criteria**

In determining the relative standard deviation (RSD) from multiple tubes, first determine the variance from the three measurements for each tube and average across tubes. The RSD is calculated using this average variance.

**Acceptance criteria A:** All assay results are within the range of 90%–110% of the product label claim and the RSD is NMT 6% or as specified in the product specification or in the compendial monograph. If the RSD is greater than 6%, use **Acceptance criteria B**.

**Acceptance criteria B:** No assay result is outside the range of 90%–110% of the product label claim and the RSD of the 12 assay results is NMT 6% or as specified in the product specification or in the compendial monograph.

For multiple-dose products in tubes that contain less than 5 g of product: Test the top and bottom portions of two tubes. All assay results should be within the range of 90%–110% of the product label claim or as specified in the product specification or in the compendial monograph.

**PRODUCTS PACKAGED IN CONTAINERS OTHER THAN TUBES**

For semisolid products packaged in a container other than a tube when the sampling method presented above cannot be used, other sampling methods are acceptable, such as the one described below for a jar.

1. Select a suitable syringe of sufficient length to extend to the bottom of the container.
2. Remove and set aside the syringe plunger and cut off the bottom of the syringe barrel. Sampling should take place from a location to the left/right of the mid-line of the jar surface to preserve an undisturbed region on the other side for any additional investigation (See Figure 1).

![Figure 1. Sampling from a jar container.](image)

3. Slowly push the syringe barrel into the container until it reaches the bottom. Then, twist the syringe barrel containing the sample core, and remove the syringe from the container.
4. Insert the syringe plunger into the barrel and carefully extrude the sample core onto a clean surface in three equal portions to represent the top, middle, and bottom portions of the container.
5. Remove an appropriate sample representative of the middle section of the top, middle, and bottom portions of the container samples, and test according to the instructions outlined in **Products packaged in tubes**.

**SPECIFIC TESTS FOR TRANSDERMAL DELIVERY SYSTEMS**

**Adhesion Test**

This test is applicable to TDS or patches that are formulated with an adhesive layer to ensure intimate contact with the skin to allow the delivery of the desired dose of drug. Adhesives in TDS must permit easy removal of the release liner before use, must adhere properly to hu-
man skin upon application, must maintain adhesion to the skin during the prescribed period of use, and must permit easy removal of the TDS at the end of use without leaving a residue or causing damage to the skin or other undesirable effect(s). Additionally, adhesives must be able to maintain the performance of the TDS throughout the shelf life of the drug product.

Three types of TDS adhesion tests are generally used: peel adhesion test (from a standard substrate), release liner peel test, and probe tack test. The peel adhesion test and release liner test assess two different TDS drug product attributes and both tests are required. The probe tack test, if applicable, is generally part of the manufacturer’s specification for the drug product.

Adhesion test acceptance criteria are product specific and should be defined generally to assure that adhesion of each batch of TDS is within the range defined by the product design and is consistent between batches based on the product development specifications or statistical assessment of multiple product batches over the product’s shelf life.

Peel Adhesion Test

This test measures the force required to remove (peel away) a TDS attached to a standard substrate surface (usually polished stainless steel). The TDS is applied to the substrate using specified techniques for application and is conditioned at specified temperature and time. Then, the TDS is peeled away from the substrate with an instrument that allows control of peel angle (usually 90 or 180 degrees) and peel rate (usually 300 mm/min), and the peel force is recorded. This procedure is repeated using a minimum of five independent samples. The product fails the test if the mean peel force is outside the acceptable range determined during product development and/or based on statistical assessment of multiple product batches over the product’s shelf life.

Release Liner Peel Test

This test measures the force required to separate the release liner from the adhesive layer of the TDS. The test is performed with a finished product sample. The test sample is conditioned using specific procedures (temperature and time). Then the release liner is pulled away from the TDS with an instrument that allows for control of peel angle (usually 90 or 180 degrees) and peel rate, and the peel force is recorded. This procedure is repeated using a minimum of five independent samples. The product fails the test if the mean peel force is outside the acceptable range determined during product development and/or based on statistical assessment of multiple product batches over the product’s shelf life.

Probe Tack Test

This test measures the force required to separate the tip of the test probe from the adhesive layer of the TDS. This test employs an instrument designed to create a bond between the tip of a test probe of defined roughness and the TDS using a controlled force (light pressure) and specified test conditions (i.e., rate, dwell time, temperature). Then, while controlling the rate of probe removal, the test measures the profile of force required to separate the probe tip from the TDS and the maximum force required to break the bond (tack). This procedure is repeated using a minimum of five independent samples. The product fails the test if the mean test result [force profile(s) and/or tack] is outside the acceptable range determined during product development and/or based on statistical assessment of multiple product batches over the product’s shelf life.
Leak Test

This test is applicable only to form-fill-seal (reservoir or pouched)-type TDS. Form-fill-seal patches must be manufactured with zero tolerance for leaks because of their potential for dose dumping if leak occurs.

In-process control methods examining 100% of the TDS for leakers or potential leakers are needed and require considerable development on the part of TDS manufacturers.

In-process testing

During the manufacturing process, the presence of leakage, or potential for leakage, because of patch perforation, cuts, and faulty seals resulting from failures such as air bubbles, gel splash or misalignment of a patch’s backing and release liner layers, must be examined. Unless automated process analytical technology is implemented, in-process testing to identify these defects should be performed using the following test procedures:

VISUAL INSPECTION

1. A specified number of patches, defined based on the batch size, should be randomly examined.
2. Each sampled patch should be thoroughly visually inspected for leakage.
3. The product fails if the number of patches detected with a leak is greater than the acceptable limit.

SEAL INTEGRITY

Transdermal patch seals should be stress tested to ensure that the application of pressure does not force seals to open, thereby leading to leakage.

1. A specified number of patches, defined based on the batch size, should be randomly examined.
2. Each sampled patch should be thoroughly visually inspected for leakage.
3. Each sampled patch is placed on a hard, flat surface and overlaid with a weight so that it is subjected to 1000 g of weight per cm² of pouch surface area. The weight should be left in place for 2 min. Upon removal of the weight, the patch should be visually inspected for leakage.
4. The product fails if the number of patches detected with a leak is greater than the acceptable limit.

FINISHED PRODUCT TESTING

Patches may leak after they have been individually placed in the primary packaging material as a result of the packaging operation itself or by user opening of the packaging. Therefore, patches should be tested for leakage after they have been manufactured and packaged in their primary packaging material.

1. A specified number of samples, defined based on the batch size, should be randomly tested after they have been placed in their primary packaging material.
2. The sampled patches should be removed from their packaging and thoroughly visually inspected for leakage.
3. Each sampled patch should then be uniformly wiped with a solvent-moistened swab. Both the backing side and the release liner side of the patch should be wiped. The inside surface of the pouch should also be wiped. The swab(s) is (are) then extracted and assayed for the drug.
4. The product fails if the total amount of drug from the patch, and the corresponding pouch, exceed the acceptable limit for any of the patches tested. ▲USP35