Center for Veterinary Medicine Second eSubmitter Webinar, Afternoon Break-out Session Target Animal Review Divisions 1, Webinar for Demonstration of the Traditional New Animal Drug Application for Free-Choice Medicated Feeds
August 22, 2018

Hello and welcome to the CVM eSubmitter webinar training for the submission of a New Animal Drug Application (NADA) for a Type C free-choice medicated feed using a proprietary formula.

The NADA type for these submissions is a traditional NADA. That is, these are submissions that have not undergone phased review under an Investigational New Animal Drug file or INAD. As a result, all necessary information for approval is to be provided in the NADA submission.

First you will click on "Create New Submission". However, for the purposes of this demonstration, I have already filled out the template and will be walking you through it. So, I will click on "Open Existing Submission".

On the first screen you will select your document type from the drop-down menu. In this scenario, you will select "New Animal Drug Application" or document type N. Because you are opening a new NADA you will answer the question, "Is this submission for a currently established file or application with "No". No information can be input into the next box, as the document number will be assigned to you upon submission of this request.

Next, you will click on the right arrow to advance to the next screen.

For more information on filling out each of the screens on this tab, I direct you to the "How to Use the eSubmitter Tool" webinar. Once these screens have been filled out, you can advance to the next tab.

On this screen, you will select from the drop-down menu the NADA Submission Type. In this case, because we selected "No" to the question on the first screen, there is only one option, "Original NADA" or submission type A; likewise, there is only one option for the second drop-down menu. Next, you will select the review division to which you are submitting the application. All Type C free-choice medicated feed applications, regardless of the proposed indications, are reviewed by HFV-120, the Division of Production Drugs. For the next question, again, because of the submission type, no response can be entered. This would only be used to indicate an amendment to a currently pending submission.

Click the right arrow to proceed to the next set of screens.

As you can see here on the left, there is a lot of information that can potentially be submitted as part of a traditional NADA. However, because this webinar is specific for a free-choice medicated feed, the requirements for approval are not as comprehensive as those for approval of a new drug substance. As such, we will only be demonstrating those screens applicable to this submission type.

At the top of the first screen, you will click on the button with the green plus sign to attach your User Fee cover sheet.

The first question asks if this an application requesting approval of a combination that meets the criteria outlined in the Animal Drug Availability Act or ADAA of 1996, to which you will respond "No".

This is not an administrative NADA, so please select "No" to the next question.

For the third question, you will always answer "Yes". Type C free-choice medicated feeds rely on the original safety and effectiveness data contained in the NADA for the Type A medicated article used to manufacture the free-choice feed.

The last question asks if there is patent information to be submitted which claims the drug or the use of such drug. If you select "yes", this will activate screen 1.2 for you to provide additional information. If you do not have a patent for the drug product, you will select "no" and then check the box at the right of the screen to attest that there is no such patent that claims the drug or the use of the drug in the manner prescribed. For our demonstration purposes today, I will select "yes" so that we can preview screen 1.2.

Lastly, at the bottom of the screen, please provide in the text box, a brief description of the application.

Then, using the right arrow, advance to the next screen.

Here you will provide information regarding the various associated files that contain information to support approval of your formulation.

For instructions on how to input information for screens with this general layout, please see the aforementioned webinar on the use of the eSubmitter tool.

For this example, I will use an INAD for the proposed formulation and the NADA for the Type A medicated article. If you do not have an INAD for your proposed formulation, you will only need to enter the reference NADA.

First, you will click on "new", which will bring up this screen. Here you will select the application or file type, then input the number associated with the file. Your response to the next section regarding which technical sections the file or application supports will depend on the information contained within the file or application.

Generally speaking, for a proprietary formulation of a medicated free-choice feed, the INAD often includes only food-use authorizations, notices of claimed investigational exemption or NCIEs, also known as drug shipment notices, as well as a protocol review and concurrence. If you have a concurred-upon protocol, you should select the effectiveness technical section. Then, in the text box below, please identify what information is contained in the INAD and provide details regarding the submissions, as noted in the instruction box.

Because the INAD belongs to you, select "yes" to the next question.

Next, you will need to provide the NADA number for the Type A medicated article. You will click "New" to once again bring up this screen. You will select NADA from the drop-down menu and provide the application number. Next, you will check all four boxes, since the application contains information related to all four major technical sections.

If you are not the owner of the NADA, you will answer "no" to the last question. In addition, you will need to attach a right of reference letter provided to you from the sponsor of the Type A medicated article by clicking on the button with the green plus sign. If you do not have a right of reference, we will be unable to approve your product.

Next, on screen 1.2, if you answered in the affirmative that there is a patent applicable to your drug product, you will click "new" and then provide the patent number, the expiration date, as well as the patent type and then proceed to the next screen.

On screen 2.0, you will input your product description. First, you will click on "new" and then you will respond to the various questions and prompts on this screen.

You will answer "yes" or "no" regarding a USP monograph for your drug product, and then input the product established name. The product established name is denoted in parentheses on labeling, but it is acceptable to include it here without parentheses if you choose. The appropriate nomenclature is the drug name of the Type A medicated article followed by "Type C free-choice medicated feed". The only capitalized letters are the T in Type and the letter C.

Next, you will enter your proposed proprietary name.

And then, from the drop-down menus, you will select the Dosage Form, which is "Medicated Article or Feed", the Dosage Form Variation is "Type C Medicated Feed", the Route of Administration is "Oral", the Route of Administration Variation is "In Feed", and then you will select the Common Animal Name, Class and Sub-Class, if applicable.

Lastly you will answer "yes" or "no" if the drug was formally granted a minor use minor species designation for the proposed indication.

Once complete, you will move on to the technical sections screen.

On screen 3 you will identify which technical sections you are submitting to support the NADA.

For free-choice medicated feeds, the proposed product relies on the target animal safety, effectiveness, and human food safety data contained in the NADA for the Type A medicated article that is used to create or manufacture your Type C medicated feed. Thus, free-choice feed applications only need to provide free-choice intake or consumption study data for effectiveness, along with the information to satisfy the chemistry, manufacturing, and controls or CMC technical section, the environmental impact technical section, the labeling technical section, and all other information technical section.

Before moving on, answer "yes" or "no" if this application is for a conditional approval, and then, using the right arrow, advance to the first technical section, which is effectiveness.

Because this is a traditional NADA, we will assume that you have not received any technical section complete letters and thus will respond to the first question on the first screen for each technical section screen with "no".

Once you have done so, please advance to the next screen. Please note: If you do have a technical section complete letter for any of the required technical sections, please answer appropriately and attach the required documentation.

On this screen, you will select "Field Study" to indicate your intake or consumption studies.

On the next screen, you will click inside the text box to provide a brief description of the studies.

Then you will click the box with the green plus sign. Here, you will attach your entire effectiveness technical section information for your consumption studies. You will include all study documentation, raw data, final study reports, data analyses, etc. Once all documents have been attached, you will move to the last requirement for the effectiveness technical section. Here you will provide FOI text for the effectiveness section. You can do so by cutting and pasting or typing into the text box or by attaching a PDF document.

Next, we move to the CMC technical section. Again, you respond "no" to the first question. The next questions asks if you are submitting sterility data or information which is not required for this file type so you will respond, "no". The third question is about Feed Method Trial data/information. The study method trial is a multi-lab transfer study used to demonstrate that a medicated feed assay method is reproducible. Please see the CVM Guidance for Industry #136 for additional information. However, if you are using an AOAC method or the NADA sponsor's approved method for the feed assay, you do not need to do a feed method trial, you simply need to demonstrate that the method has acceptable performance with your free-choice feed formulation. The validation and verification data would be submitted as part of the Drug Product attachment under Section 3.3.2., which we'll get to momentarily.

On the next screen, you will provide information about the drug substance, which is the Type A medicated article. For the first question, you will respond, "no". For free-choice feeds, you will reference only the NADA and not the veterinary master file.

On the next screen, you will click "new" to bring up this set of questions. Here you will provide the manufacturer information for the Type A medicated article. Please work with the drug substance sponsor to determine the appropriate responses to these questions.

Next, you will provide information regarding your proposed formulation.

For the first question regarding a Pharmaceutical Development Report, typically the appropriate response is "No".

Next, you will click on the button with the green plus sign where you will attach the supporting drug product information and data. Here you will attach the complete CMC technical section that describes the manufacture of the free-choice feed, which also includes the homogeneity and segregation data. Stability data will be input later.

Next, you will provide the manufacturer information for the proprietary Type C medicated feed by clicking on "new" and completing these fields.

And then lastly, for the CMC section, please attach the documentation for the warehouse and in-field stability studies on this screen.

For the environmental impact technical section, you will respond "no" to the first question and then click the first option for a claim for a categorical exclusion under 21 CFR 25.33.

On the next screen, you will select the first option, that the action does not increase the use of the animal drug.

Next, you will select the fourth option, that the drug is a previously approved animal drug to be contained in medicated feed blocks or as a liquid feed supplement.

In the text box below, you will provide a brief description of the drug use, dosage, etc. as prompted.

Lastly, you will answer the question regarding extraordinary circumstances. Please note the information below the question regarding the impact of this question on your ability to claim a Categorical Exclusion.

On the next screen, you are prompted to provide draft text for the human food safety section of the freedom of information summary for your drug product. Please include the language from the corresponding section of the FOI summary for the Type A medicated article, as your product relies on that information and is accurately summarized thusly.

Next, we will address labeling.

Again, answering no to the first question.

You will identify the type of labeling you are submitting. This is draft labeling thus it is considered facsimile labeling.

You will then answer "yes" that is a drug used in a medicated animal feed.

On screen 3.6.1, you will identify the types of labeling you are submitting for review.

If your proposed product includes an antimicrobial drug of human importance as described in Guidances for Industry #209 and #213, you are required to include a veterinary feed directive with your application.

CVM requires that you submit a copy of the proposed draft VFD for your product, and CVM recommends that you also include a copy of the approved VFD for the Type A medicated article.

In addition, CVM encourages sponsors to include the approved Type A medicated article label for the drug used in the proprietary formulation, although this is not a requirement.

However, all free-choice feeds are Type C feeds and require appropriate labeling as such, so you will always click the fourth box.

If your product will be packaged and shipped, please include the shipping label for CVM review.

Based on your responses to the previous screen, you will have different options to attach different types of labeling. For this example, because I selected VFD, Type A, and Type C labeling, I am now prompted to attach those labeling pieces here by clicking on the box with the green plus sign under each section.

Once you have done this, you may proceed to the next screen.

For the final technical section, you will provide all other information. Here, by clicking in the text box, you can provide a reference to the drug experience report, or DER, for the Type A medicated article. In addition, if you have conducted any pilot studies or investigative work using the same formulation as the proposed product and it has not previously submitted to

CVM for review, you should describe those studies in the text box and attach all supporting documentation by clicking on the button with the green plus sing.

Lastly, on screen 5, if you would like to provide a cover letter or if there are additional comments you would like to provide to CVM regarding this submission, you may use the text box or attach documentation to provide that information.

And with that, this concludes our walk-through demonstration of a traditional NADA for a Type C free-choice medicated feed using a proprietary formula. For more information on saving, packaging, and submitting the application, please see our webinars on general use of the eSubmitter tool. Thank you.