SUPPLEMENTAL POLICIES

PROCEDURE FOR CENTER RECOMMENDED LABELING CHANGES

1. Purpose:

   The purpose of this guide is to provide information on labeling changes made through the supplemental approval process.

2. Procedure:

   a. From surveillance operations, it may be determined that a drug subject to an approved NADA needs a labeling revision to reflect new information about its adverse effects.

   b. In the absence of a proposal by the applicant to make the change, it is appropriate to recommend to the applicant that he/she submit a supplement providing for the change.

   c. The form of recommendation will depend on the significance of the change and the circumstances. It may be desirable to discuss the problem with the applicant by telephone or in person.

   d. If a letter is written suggesting the change and requesting comments on the suggestion, it is prepared for signature of the Director of the Division of Epidemiology and Surveillance or his designee.

   e. If the change is of sufficient importance to the safe and effective use of the drug that it should be made promptly, a letter should be sent to the firm requesting that the revision be made within "x" number of days or that the revision be effected promptly and that we be informed within "x" number of days of the firm's plans. It may be necessary to prepare the letter for signature of the Office Director or even the Commissioner.

   f. The above procedures may be used for other changes which are indicated for a drug which has been cleared through the NADA procedures.

3. Multi-NADA Changes:

If the drug is provided for in more than one NADA and if the change is one which applies to all (as a labeling change), it is necessary to notify each applicant and refer to each NADA for which such change is appropriate.

4. Drug Warning Letters:

In some instances, new side effect information provided for in the supplement may be of such significance that revision of labeling is not sufficient to provide adequate protection. To alert veterinarians to the findings, a "Dear Doctor" or drug warning letter may be sent by the manufacturer(s) or, on occasion, if there are many manufacturers, by FDA. Such letters are generally prepared in accordance with 21 CFR 200.5. A brief memorandum describing the action should be prepared for dissemination to the Associate Commissioner for Regulatory Affairs.

(a) Letter:

(1) Content. The content of letters to be issued by firms is generally worked out between representatives of the company or companies and appropriate Divisions within CVM including the Divisions of Compliance and Epidemiology and Surveillance.

(2) Other factors. In addition to the content, the following details must be worked out and an understanding reached:

(i) The legend to be used on the envelope (so that it will not be discarded by the recipient, unopened).

(ii) Mailing list to be used.

(iii) Approximate date of issuance.

(iv) The use of first class mail and number 10 white envelopes.

(3) If the letter is to issue from the applicant, the informational context of the letter should be included in the supplement covering the labeling revision.

(b) Briefing Memorandum

(1) A briefing memorandum will be directed to the Office of the Associate Commissioner for Regulatory Affairs (HFC-1) describing the background and the proposal to issue a drug warning letter, draft copy to be attached. It should include the understandings reached with the firm concerning issuance of the letter and the extent of dissemination.

(2) The briefing memorandum will request the approval of the proposal or confirm a prior oral agreement.