OFFICE OF NEW ANIMAL DRUG EVALUATION REVIEWER'S CHAPTER

H SUBMISSIONS PRECEDING MEETINGS AND PROTOCOLS

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I. PURPOSE

The purpose of this Program Policy and Procedures Manual Guide (P&P) document is to describe for Office of New Animal Drug Evaluation (ONADE) reviewers:

- the different types of H submissions,
- administrative processes for an H submission associated with meetings and protocols, and
- review of H submissions associated with meetings and protocols

This document applies to new animal drug review leading to a new animal drug application (NADA) or a supplemental NADA; and all technical sections submitted to an investigational new animal drug (INAD) file for all NADA projects.

This document does not apply to generic investigational new animal drug (JINAD) file submissions or abbreviated new animal drug applications (ANADA). However, this document does apply to supplemental applications to approved ANADAs submitted under Section 512(b)(1) of the Federal Food, Drug & Cosmetic Act (FD&C Act) (i.e., "(b)(1) supplements that require safety or effectiveness data").

II. BACKGROUND

The procedures outlined in this P&P do not require sponsors to submit data and information, conduct specific studies, or submit specific information in an H submission other than what is required in 21 CFR 514.5(b).

As part of the negotiations for the reauthorization of the Animal Drug User Fee Act (ADUFA), the Center for Veterinary Medicine (CVM) agreed that by October 1, 2023, the Agency would publish a P&P for CVM reviewers who are advising sponsors on:

- Information/data included in H submissions related to presubmission conferences (PSC),
- Timing of the related meeting request submission,

- How CVM should schedule meetings, such that they occur on, or in close proximity to, the H submission due date, and
- The appropriate timing of a protocol submission associated with an H submission containing information to support a protocol.

In addition, this P&P will provide best practices for reviewers to advise sponsors regarding the appropriate timing of protocols submitted for review concurrent with an H submission containing supporting information. The best practices will describe the types of information typically submitted to support protocol procedures and considerations that may affect the ability of a reviewer to concurrently review the supporting information and a protocol.

III. WHAT IS AN H SUBMISSION?

A. Types of H Submissions

An H submission has a 100-day review clock in our Submission Tracking and Reporting System (STARS), with 80 days for consulting reviewers. There are several types of H submissions.

1. Information prior to a meeting (subclass code MS)
2. Information to support a protocol (subclass code SP)
3. Information necessary for product development where the sponsor is not specifically justifying protocol design and wants feedback in a letter and not a meeting (subclass code OT). However, the contents of this type can be similar to H-SP or H-MS, but not directly associated with a pending protocol or meeting request.
4. Raw Data Agreement H Submission. Please see P&P 1243.4095 for more information on this type of H submission.[1]

The focus of this P&P is H-MS and H-SP submissions (types 1 and 2 above). Information regarding the other types of H submissions mentioned above is provided for helpful context in differentiating or explaining areas of overlap among the purposes for submitting information in an H submission.

B. Contents

H submissions generally include data or scientific information intended to support the design of a study protocol, provide information on the pharmacological/toxicological characteristics of a compound, or provide background information for product development prior to a meeting.[2] H submissions may contain literature, final study reports (or study summaries, if applicable) for pilot or pharmacokinetic (PK) studies, foreign market experience, or other information. Depending on the purpose of the supporting data and information, CVM may request individual animal data as needed (e.g., for PK studies). However, copies of raw data are generally not required or requested for these types of submissions. If copies of raw data are included in the

[1] See 1243.4095 Review of Raw Data Agreement H Submission for Target Animal Safety Studies.
[2] If the purpose of the information is to support a technical section requirement, then the information should be submitted in a P submission.

submission, the reviewer should consider the purpose of the submission, and review the submitted information to an appropriate level of detail commensurate with the purpose. Some select copies of raw data may be important to the purpose of the submission (e.g., records from animals experiencing adverse events in a pilot study when that study is submitted to support the target animal safety (TAS) study design). However, it is important to not "pre-review" potential pivotal raw data under the guise of an H submission.

In the H submission, the sponsor should adequately identify the aspects of the protocol or product development plan that the data or information within the H submission are intended to address.

C. Examples for MS, SP, and OT Subclass Types

Below are common examples of information that might be included or requested to be submitted in an H-MS, H-SP or H-OT submission type. This list is not intended to be all-inclusive. The examples of information associated with one type of H submission could be submitted in another type of H submission or within entirely different submission types (P submission, A-0000). Generally, the submission type chosen by the sponsor is driven by the information submitted (e.g., if supporting a specific study design element in advance of a protocol, H-SP would be appropriate). However, it may also be driven by the outcome the sponsor prefers (e.g., if the sponsor prefers to discuss the information in a meeting rather than receiving a letter in response, H-MS would be appropriate). Prior to advising the sponsor on which submission type to request, the reviewer should determine the sponsor's desired outcome.

1. H-MS Examples

    1. Early information.[3]

    2. Product background information, which may include study summaries, literature, and/or foreign market experience, may be submitted for discussion at a meeting.

    3. Information to support the immunogenicity assessment for specific drug classes. The intent of this submission would be to obtain CVM's agreement of the proposed methods to assess for potential immunogenicity prior to data submission. Alternatively (and preferred), the sponsor can provide their proposed methods to assess for potential immunogenicity prior to submitting a study protocol that intends to collect samples to evaluate immunogenicity.

2. H-SP Examples

    1. An H submission may contain dosage data and other information when integral to the review of a protocol. Such information may be needed to ensure selection of optimal study time points and would be particularly important for novel drugs and drugs with modified release characteristics. The dosage characterization section of an Effectiveness (EFF) P submission may reference the H submission.

[3] ONADE P&P 1243.2200, Submission and Review of Early Information (EI) to Presubmission Conferences and Protocol Review.

2. A toxicological and pharmacological characterization package[4] for TAS in support of a protocol may be submitted as an H submission. The TAS technical section should reference the H submission.

3. Information to support the use of a particular study procedure, design element or end point, proposed for use in a study to support a technical section. For example, the prandial state at dosing may affect the bioavailability of a drug. Therefore, a fed/fasted PK study may be submitted within an H submission to provide information to support the appropriate prandial state to be used in the safety or effectiveness protocols.

4. Justification for a proposed deviation from current published guidance (e.g., different multiples of dose in a TAS study, variation from necropsy and histopathology examinations recommended in Guidance for Industry #185 Target Animal Safety for Veterinary Pharmaceutical Products VICH GL43, etc.).

5. Information to support an analytical method for detection of the new animal drug (parent or metabolite) in substrates such as medicated feed (Type B and/or C), tissue (e.g., muscle, kidney, liver, blood), and/or water. Feed assay methods are needed for feed homogeneity and stability studies for the Chemistry, Manufacturing, and Controls technical section and for studies employing medicated feed such as TAS and EFF, and Human Food Safety (HFS) technical section residue depletion studies. Analytical methods for tissues are needed for the Total Residue and Metabolism and Tissue Residue Depletion studies for the HFS technical section, and for pharmacokinetic studies conducted to support the TAS and EFF technical sections.

6. Tissue method validation and method standard operating procedure (SOP) data to support aspects of the HFS technical section. These method validation studies contain the analytical method validation final report, copies of the raw data, and method SOP. For an interlaboratory method trial transfer study, CVM/ONADE performs the review of the method validation study under the H submission and consults CVM Office of Applied Science requesting the review of the method SOP and method validation data. After reviewing the H submission, CVM will send an acknowledgment letter to the sponsor with specific comments on the method validation study. If the method is adequately validated, after receiving the acknowledgment letter from CVM/ONADE, the sponsor may request any method trial related meetings under a Z submission.

3. H-OT Examples

    1. CVM may request or a sponsor may use H submissions for a variety of issues that arise during product development. Examples may include:

        a. Information to support the appropriateness or validity of a proposed indication.

[4] Office of New Animal Drug Evaluation Scientific Reference Document 1243.135.002 How to Implement CVM's Guidance on Target Animal Safety for Veterinary Pharmaceutical Products (Guidance for Industry #185)

b. Additional justification to support an aspect of the project development plan when the sponsor disagrees with CVM's previously provided guidance to the sponsor (e.g., PSC or other meeting).

c. Information to support a novel study design (such as adaptive study design) or biomarker validation information.

2. Information related to extended and delayed release products, which may include development of early and final formulation, identification of critical quality attributes that may impact the drug release profile, information in support of the development of the in vitro drug release method, scientific rationale on the proposed dosage form and why the drug substance is a good candidate for the selected release profile, etc.

IV. ADMINISTRATIVE PROCESS FOR H SUBMISSIONS FOLLOWED BY A MEETING (H-MS)

A. Receipt of the H-MS Submission

1. Upon receipt, the division to which the submission is directed should assess the content and purpose of the H submission.

2. The primary reviewer (PR) assigned to the H submission should be determined based on the content of the submission. If the submission supports the development plan for the TAS or EFF technical sections, the PR will be from the associated target animal division (TAD).

3. The PR should request consulting reviewer(s) (CR(s)) for the H submission, as appropriate based on the content and purpose of the H submission.

Note: If the sponsor has indicated their intent to submit an associated PSC and include new information for other technical sections, it is not necessary to consult those representative technical sections until the meeting request (Z submission) arrives. However, it may be helpful to communicate with the appropriate team leader of the associated technical sections informally (such as by email) that a PSC request is expected.

B. Initial Review

1. The reviewer should initially identify which of these two options in the eSubmitter template the sponsor has selected for their H submission:

   a. Letter followed by discussion at the meeting. The meeting will be held after the letter is issued.

   b. No letter, just discuss at meeting. Comments will be transmitted in the memorandum of conference (MOC) following the meeting.

2. The PR and any CRs should review the submitted information, considering the type of feedback requested (for example, if the sponsor has requested a letter, whether to draft letter comments in addition to having a future meeting and drafting an associated MOC). There may be a circumstance where the sponsor has requested to receive a letter for H submission, and the PR, CR,

and their supervisors will need to clarify what the sponsor intends. The reviewers may recommend discussion in the meeting without first sending a response to the H, or if the sponsor really wanted initial feedback, the PR, CR, and their supervisors could advise them to use the ERL process for a PSC request that has not yet been submitted. If the meeting request has already been submitted, and the sponsor wishes to use the ERL process, please refer to P&P 1243.3024 – Scheduling and Holding Meetings with Outside Parties.

Note: If the sponsor has not requested to receive a letter in response to their H submission, CVM may still choose to send a letter if there are unforeseen circumstances (e.g., the meeting is delayed or cancelled).

C. Review Documentation and Appropriate Final Action (FA) Codes

1. The PR and CR(s) should determine collectively the most appropriate way to document their reviews for the H submission. There are several acceptable options based on the content and purpose of the submission, and the sponsor's request for format of feedback (see below). As noted above, the review team may discuss the best approach with the sponsor and advise a different approach than what the sponsor selected in eSubmitter. Reviews (if prepared) should be prepared in accordance with Format and Style Conventions for Reviews and Submission Summaries (P&P 1243.3009).

    a. File No Reply (FNR): This may be appropriate if the PR, CR(s), and their supervisory chain agree all review documentation for the H submission will be included under the Z (including any reviews and the final MOC) **and** the sponsor will not receive a letter for the H submission. If the PR closes the H submission as FNR, the PR should include a comment (e.g., Appian, Review Summary field) which identifies the associated Z submission (e.g., Z-XXXX), and states that CVM's responses to the H submission will be fully documented under the Z submission.

    b. FNR with memo: This may be appropriate if the PR, CR(s), and their supervisory chain(s) agree that review documentation (either a review or a memo to file) is appropriate for the H submission **and** the sponsor will not receive a letter for the H submission. The PR and CR should determine whether the CR can close their consult with a comment or should also provide a review.

    c. Acknowledgement (ACK): This FA is appropriate if the sponsor has elected to receive a letter in response to their H submission. The responses in the letter would be discussed within the meeting, and the meeting will not include new topics or proposals.

    This may also be appropriate if the sponsor hasn't submitted the meeting request (Z), if the sponsor has indicated that they no longer plan to submit a meeting request, or if there are unforeseen circumstances which require postponement or cancellation of the meeting. With this FA, the PR should prepare a review. The PR and CR should determine whether the CR can close their consult with a comment or should also provide a review.

2. The PR and any CRs for the Z submission should review the meeting request in accordance with the P&P 1243.3025, “Preparing Meeting Documentation (i.e., Memorandum of Conference, Acknowledgement Letter, Other Review Documentation)” along with P&P 1243.3024, “Scheduling and Holding Meetings with Outside Parties”.

D. Timing of Associated Meeting Request (Z Submission)

Sponsors may submit the meeting request associated with an H submission at any time after the H is submitted. Typically, the project manager (PM) will discuss the timing of the submission of the meeting request with the sponsor and should encourage the sponsor to submit the meeting request as soon as possible to allow for scheduling the meeting around the sponsor’s preferred date(s). However, if the PM has not previously discussed the submission or timing with the sponsor, the PR may also reach out to the sponsor or ask the PM to do so.

If the sponsor is not ready to submit their meeting request at the same time as the H submission, they should be advised that we will schedule the meeting according to our usual processes (see Section E below).

E. Timing of the Meeting in Relation to the H Submission Review Clock

For general information on scheduling meetings, please consult P&P 1243.3024, “Scheduling and Holding Meetings with Outside Parties.” The remainder of this section discusses when meetings should be scheduled as they relate to the associated H submission review clock.

1. When the sponsor submits the meeting request (Z submission) prior to Day 50 into the H submission review, the PR for the Z submission should make every effort to schedule the meeting with the sponsor at or near Day 100 (±10 days) of the H submission review clock, unless the sponsor requests a later date.

   If the meeting request is a PSC, the PSC may exceed the 60-day expected scheduling timeframe, if necessary. For example, if the meeting request is submitted at Day 49 of the H submission review clock, and the meeting can be scheduled at Day 100, the PSC will not be outside of the 60 days. However, if the meeting request is submitted at Day 20 of the H submission review clock, then the PSC would be scheduled outside the 60 days for the PSC. The PR can indicate in Appian that this is at the request of the sponsor. Note: The ±10-day window is intended to allow flexibility for the date that best fits the schedules of all required attendees.

2. If the sponsor submits the meeting request (Z submission) after Day 50 of the H review clock, we should schedule the meeting according to P&P 1243.3024, “Scheduling and Holding Meetings with Outside Parties”.

   Note: If the sponsor submits the meeting request after Day 50, you may still schedule the meeting on or around Day 100 if it fits the schedule of all required attendees.

V. ADMINISTRATIVE PROCESS FOR H SUBMISSION ASSOCIATED WITH A PROTOCOL (H-SP)

A. Upon Receipt of the Submission

1. Upon receipt, the Division to which the submission is directed should assess the content and purpose of the H submission.

2. The PR assigned to the H submission should be determined based on the content of the submission and established Division processes. For example, if the H submission includes pharmacokinetic information or information on statistical analysis, but ultimately informs clinical decisions regarding TAS or EFF study design, the PR should be from the TAD. However, there are some H submissions which might be primarily assigned to the Clinical Pharmacology Team (for example, fed-fasted pharmacokinetic studies and bioanalytical method validations to support pharmacokinetic data).

3. The PR should request CR(s) for the H submission, as appropriate based on the content and purpose of the H submission.

B. Initial Review

1. The reviewer should initially identify the sponsor's response to the following specific eSubmitter template questions:

   a. "Have you previously submitted Early Information (EI) to this INAD File?"

      The sponsor will indicate in eSubmitter whether the INAD file contains Early Information (EI), specifically that such EI was previously submitted and reviewed by CVM.

   b. "Does this submission contain EI?"

      If the current H submission contains EI, this submission may not be eligible for concurrent review of a protocol, because EI should be submitted prior to the PSC (see EI P&P 1243.2200) and the PSC should be conducted prior to protocol review in most cases. This question is included in the H submission SP template because it can be used both to submit EI and to submit information later, after the PSC has occurred.

   c. "Please designate the timing of the protocol you anticipate for this H-SP submission. Please select only one."

      The sponsor will have the following choices:

      (1) My file contains EI, and my protocol is ready for submission, therefore I plan to submit the protocol at day 50.

      (2) My protocol is ready for submission no earlier than day 50 if CVM agrees (i.e., it has been drafted, been through internal QA, etc. and is ready for submission).

      (3) I intend to wait to submit a protocol after receiving CVM's response to the H submission.

(4) During a PSC meeting with CVM, I was told I could submit the protocol at Day 50 of following submission of the H and I plan to submit the protocol after day 50.

2. PR actions

a. If the sponsor selects option (1), and the INAD file contains EI (as defined in P&P 1243.2200, Submission and Review of Early Information (EI) to Presubmission Conferences and Protocol Review), the associated protocol is eligible for concurrent review. Therefore, there is no additional decision making or action required from the reviewer. The sponsor is responsible for submitting the associated protocol after Day 50 in the H review clock.

b. If the sponsor selects option (2), the PR and CRs collectively and collaboratively will decide early in the review (prior to day 30 of the H submission review clock) as to whether it is recommended that the sponsor submit the protocol after day 50 of the H review clock. The reviewers should use the examples in Section E below to help guide this decision. After evaluation of the files, the PR will email the sponsor ideally prior to day 30 of the H submission to communicate to the sponsor whether CVM agrees to concurrent review when the protocol is submitted after day 50. The PR should use the template language located in the Appendix to maintain consistency.

c. If the sponsor selects option (3), the PR and CR(s) should plan to prepare letter comments in response to the H submission. The PR does not need to reach out to the sponsor to indicate whether they recommend concurrent protocol review.

d. If the sponsor selects option (4), they will be asked to provide the PSC meeting (Z) submission number. In this case, the reviewer should check the indicated Z submission MOC to confirm the sponsor's assertion. If CVM previously agreed, the sponsor may submit the protocol at Day 50 and no additional action is required. If CVM did not agree, the PR should discuss next steps with their TL, which may include providing the sponsor the same feedback decision which occurs when they select option (2).

C. Review Documentation and FA Codes

The PR and CR(s) should determine collectively the most appropriate way to document their reviews for the H submission. The sponsor may reference specific areas of the protocol; however, CVM should not conduct a complete protocol review within the H submission. There are several acceptable options for review documentation based on the content and purpose of the submission, Division processes, and whether the sponsor submits a protocol for concurrent review. Reviews (if prepared) should be prepared in accordance with Format and Style Conventions for Reviews and Submission Summaries (P&P 1243.3009).

1. FNR: This may be appropriate if the PR, CR(s), and their supervisory chain agree all review documentation for the H submission can be incorporated into a final action package for a concurrently reviewed protocol and any comments incorporated in the letter (complete or incomplete) issued and the sponsor has

submitted the protocol for concurrent review. If the PR closes the submission as FNR, the PR should include a comment which identifies the associated E submission (e.g., E-XXXX) for the protocol, and states that CVM's responses to the H submission will be fully documented under the E submission.

2. FNR with memo: This may be appropriate if the PR, CR(s), and their supervisory chain agree that review documentation (either a review or a memo to file) is appropriate for the H submission and the sponsor submits the protocol for concurrent review. The PR and CR should determine whether the CR can close their consult with a comment or should also provide a review.

3. ACK: This FA is appropriate in most cases, but especially if CVM has recommended against concurrent protocol review. This may also be appropriate if the sponsor hasn't submitted the protocol despite indicating they intend to do so or if the sponsor has indicated that they no longer plan to submit a concurrent protocol. With this FA, the PR should prepare a review. The PR and CR should determine whether the CR can close their consult with a comment or should also provide a review.

D. Timing of Associated Protocol (E Submission)

The sponsor often asks if they can submit the associated protocol before the H submission review clock is complete. For the purposes of this P&P, "concurrent review of a protocol" is defined as submission of the protocol when the H has been under review for at least 50 days. If the protocol is submitted after day 50 of the H review clock, this will allow CVM's response to both submissions to occur at about the same time. Concurrent review of a protocol will not shorten the review time needed for the H submission.

When CVM indicates that concurrent submission of a protocol is appropriate, we are committing to incorporating the review of the H submission into the protocol review. Any study procedures impacted by the information in the H-submission will be considered during the protocol review. If CVM has not recommended concurrent review of a protocol, this indicates that CVM has not made the same commitment to incorporate information from the H review into the concurrent protocol review. In this case, CVM may not be able to review and comment on some portions of a protocol. The protocol response letter should indicate what sections CVM was unable to review fully. Additionally, when CVM indicates that concurrent review is appropriate, CVM is not providing the sponsor with an expected outcome of the review of the H submission. CVM may still disagree with the supported study element or other aspects of the protocol but agrees that the protocol can be reviewed, and comments can be provided based on the information included in the H submission.

Note: Sponsors can submit protocols at any time, and CVM will review them to the extent possible. However, if the protocol is submitted while the H is under review against CVM's recommendation, the sponsor risks that CVM will be unable to fully review the protocol appropriately as described above. There are circumstances in which a "Refuse to Review" FA may be appropriate.[5]

[5] See ONADE P&P 1243.2050, Refuse to File and Refuse to Review

E. Determining Eligibility for Concurrent Review of a Protocol

The following are submission purpose/content examples for reviewers to consider when recommending concurrent submission of a protocol after day 50. This list is not all inclusive of factors that may be used to decide whether concurrent protocol review is appropriate. Many of the listed examples require some level of reviewer discretion depending on the content of the H submission.

1. Examples of H submissions where concurrent protocol review may be appropriate:

    1. If the protocol could otherwise be reviewed with the removal or change of the study design feature being supported by the H Submission (i.e., the information supports edits such as switching out a sentence, easily changing an age or weight range, or a dosing table). For example, submission of PK data supporting whether a TAS study should be conducted in the fed or fasted condition may be eligible for concurrent protocol review.

    2. If the H submission contains a well-organized justification (with limited data review) supporting a select element of the study design. Examples might include differences of the multiples of dose for the standard 1, 3, 5X design margin of safety study (such as 1, 2, 3X for practical or safety reasons); fewer necropsy samples for a drug with well described toxicity profile; or justification for use of foreign study sites in a field study.

    3. If the submission addresses a common component or element of a typical or standard study design (e.g., pathogen source or susceptibility for an induced infestation/infection design).

    4. Bioanalytical method development for review by the Clinical Pharmacology Team.

    5. Submissions supporting the timing of immunogenicity assessments.

    6. Feed assay method and validation data for feed assay method transfer study protocols submitted to the Division of Manufacturing Technologies.

2. Examples of H submissions where concurrent protocol review may not be recommended:

    1. If CVM and the sponsor haven't agreed on a substantive part of the development plan, such as indication, dosing information (dose, frequency, duration, route of administration), or even the applicability of the study to the overall development plan.

    2. Extensive data analyses are required to review the justification (for example, if there are multiple study reports or data files to evaluate). Volume of information alone may not necessarily disqualify an H submission from concurrent protocol review; however, if the volume is such that it is difficult to determine whether feedback can be incorporated into the protocol, it may not be eligible for concurrent review.

    3. If the study design relies heavily on the consulting reviewer(s) (within or outside of ONADE), such that large portions of the study design cannot be

reviewed until the consulting reviewer(s) have provided their input on the H submission (consulting reviews are not due until day 80).

4. If the sponsor is proposing a new concept (e.g., an adaptive design) which has not been previously discussed with CVM, depending on the complexity of incorporating the novel idea into the protocol, CVM may not be able to review the protocol concurrently.

5. If the sponsor is providing justification for a study element which CVM has previously disagreed with, and the sponsor may want the opportunity to provide additional justification.

6. If the submission contains information that results in the need for multiple internal discussions prior to providing CVM's feedback (this may apply to but is not limited to novel or controversial topics).

7. If the H submission contains analytical method information for review by the Division of Human Food Safety.

8. If the H submission contains information to support study elements common to several study types (especially different technical sections), it may not be appropriate for all potentially related protocols to be submitted concurrently.

VI. REFERENCES

Guidance for Industry (GFI)

CVM Guidance for Industry #185 Target Animal Safety for Veterinary Pharmaceutical Products (VICH GL43)

CVM Program Policies and Procedure (P&P) Manual - ONADE Reviewer's Chapter

1243.2050 - Refuse to File and Refuse to Review

1243.2200 – Submission and Review of Early Information (EI) to Presubmission Conference and Protocol Review

1243.3009 – Format and Style Conventions for Review of Pending Submissions

1243.3024 – Scheduling and Holding Meetings with Outside Parties

1243.3025 – Preparing Meeting Documentation (i.e., Memorandum of Conference, Acknowledgement Letter, Other Review Documentation)

1243.4090 – Processing a Sponsor Request (H-Submission) for Written Feedback Regarding Development Plans for New Animal Drug Product Approvals

1243.4095 – Review of Raw Data Agreement H Submission for Target Animal Safety Studies

ONADE Standard Operating Procedure (SOP)

1243.135.002 – How to Implement CVM's Guidance on Target Animal Safety for Veterinary Pharmaceutical Products (Guidance for Industry #185)

VII. VERSION HISTORY

September 29, 2023 – Original version

November 16, 2023 – Minor clarification that for I-H-MS, the meeting is held (not scheduled) after the letter is issued. For I-H-SP sponsor selections, change of text from “we” to “I” to match other selections.

October 18, 2024 – Revised section IV. B. and C. to clarify the expectations for review teams when processing these submissions

APPENDIX 1. H-SP CONCURRENT PROTOCOL NOTIFICATION LETTER BOILERPLATE

A. Sponsor Can Submit the Protocol for Concurrent Review

If CVM determines the sponsor can submit the protocol for concurrent review, use the following language:

Dear <Insert Responsible Official Name Here>,

You indicated in your submission that you wish to submit your associated protocol for concurrent review with this H submission (after Day 50 of the H review clock). We agree to concurrently review your protocol if you submit it after <DATE[6]> in the H submission review clock. Please refer to this H submission number (H-XXXX) when you submit the protocol.

This agreement to review the protocol concurrently means that we agree to incorporate our review of this H submission into the protocol review. It does not mean agreement with information provided in the H submission, nor that we will concur with the portion of the protocol supported by the H submission.

Please reach out to your project manager if you no longer plan to submit the protocol concurrently so that they can inform the review team.

Please contact <DIVISION CONTACT AT EMAIL ADDRESS[7]> if you have any questions about this communication.

B. Sponsor Should Wait to Submit Protocol

If CVM determines the sponsor should wait to submit the protocol, use the following language:

Dear <Insert Responsible Official Name Here>,

You indicated in your submission that you wish to submit your associated protocol for concurrent review with this H submission (after Day 50 of the H review clock). However, based on the content of this H submission, we recommend you wait to submit your protocol until you have received our comments on the H submission (H-XXXX). If you submit your protocol concurrently, we may not be able to incorporate our review of the information from the H submission into our protocol review.

Please contact <DIVISION CONTACT AT EMAIL ADDRESS[8]> if you have any questions about this communication.

[6] Use the ONADE timeline template for H-SP date automatically calculated from the received date (50 days of the H review clock).
[7] Insert a contact name and email address as consistent with your Division developed preferences/procedures.
[8] Insert a contact name and email address as consistent with your Division developed preferences/procedures.