
OFFICE OF NEW ANIMAL DRUG EVALUATION REVIEWER'S CHAPTER

ROUTING A REQUEST TO OBTAIN A CONSULTING REVIEW OF A SUBMISSION
TRACKING AND REPORTING SYSTEM (STARS) SUBMISSION

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I. PURPOSE

This document describes the Office of New Animal Drug Evaluation's (ONADE's) standard procedures for routing a request for a consulting review (consult) of an investigational new animal drug (INAD) file, a generic investigational new animal drug (JINAD) file, an abbreviated new animal drug application (ANADA), a new animal drug application (NADA), or a veterinary master file (VMF) submission.

II. REQUESTING A CONSULT

Following the initial determination that a submission is ready to begin evaluation for review, the primary reviewer (PR) assesses what consults they need and routes the submission to the appropriate office, division(s) or team(s) for review. Consult packages are created and routed to the appropriate office, division or team using the ONADE Consult Request workflow in Appian. When preparing the consulting review request, the PR should include any instructions or questions they want the consulting reviewer to address. It may be helpful if the PR includes a reminder for the assigner of the submission to forward the email with the instructions to the consulting reviewer. Detailed instructions on how to use the ONADE Consult Request workflow in

Appian are in the Appian User Guide located on the Electronic Document Submission and Review (EDSR) page in SharePoint.¹

There may be more than one level of consulting reviews needed. A consulting review for a submission requested by the PR through Appian is identified using a sequential letter, starting with A, followed by the number 1. Multiple consulting review requests from the primary review division are sequentially identified using the next letter of the alphabet. The first consulting review request is the A1 package. The second consulting review requested is the B1 package and so on. Often a consulting reviewer determines they need consults on the package assigned to them. When this is the case, a consulting reviewer for a submission will request a consult of another reviewer through Appian. This secondary consult (a.k.a. a sub-consult) will be created using the same letter assigned to that consulting review package and the next sequential number. For example, when the consulting reviewer assigned the A1 package requests a secondary consult, the created consult will be an A2. Additional consulting reviews of the A1 or A2 submission would have sequential numbers (e.g., A3, A4, and so on).

III. GENERAL RULES GOVERNING A REQUEST FOR A CONSULT

The following guidelines are applicable to consulting a review:

A. When to Prepare the Request

The PR should keep in mind the current ONADE timelines so that the consulting reviewer(s) receiving the request has adequate time to perform the review. The request for a consult should be sent to consulting divisions/teams within five days after the submission is logged into our Submission Tracking and Reporting System (STARS) database.

B. How to Request a Consult

To request a consult, the PR should complete the ONADE Consult Request workflow in Appian. In the Instructions for Consulting Reviewer section of the template, clearly indicate what the consulting reviewer should review within the submission. The template contains a text box with a 12,500-character limit and does not allow for formatted text or tables. The instructions in the template box should be brief and if additional information or tables need to be communicated, they should be sent directly by email to the reviewer once assigned. The Create Consult Request workflow will create the appropriate consult package and direct it to the selected division/team unassigned list. Appian will also generate a notification email that is sent to the division/team point of contact notifying them that a new consult has been created and needs to be assigned in STARS. To determine who is receiving the consulting review request, refer to the Consulting Review Points of Contact document located on the Office Templates page in SharePoint.

¹ Internal information redacted.

C. How to Request a Consult for Linked Submissions

When a PR receives a linked submission that requires a consult, only the lead submission should be consulted. You can determine what submissions are linked by checking the Submission Location and Status screen in STARS Web, which has a tab labeled Linked. This tab contains the lead submission ID and all linked submissions associated with it.

D. How to Request a Consult for an Amendment

Consults for amendments are separate from consults for parent submissions. Therefore, consults for amendments must be requested separately in Appian. The PR may choose to include the parent submission number and assigned consulting reviewer in the request for convenience in the Instructions for Consulting Reviewer section of the template. Refer to P&P 1243.3026 for more information regarding amending STARS submissions.

IV. ROUTING A REQUEST FOR A REFUSE TO REVIEW (RTR)/REFUSE TO FILE (RTF) ASSESSMENT

To request a RTR/RTF consulting review for a submission, follow the procedures outlined in P&P 1243.3100. The RTR assessment is for (J)INAD P submissions and the RTF assessment is for original or supplemental (A)NADAs A and C applications containing data, excluding submissions received by the Division of Manufacturing Technologies.

V. ROUTING A REQUEST FOR ONADE'S OFFICE OF THE DIRECTOR (HFV-100)

When requesting a consult using the Appian Consult Request workflow, you must select Office for the Review Level, and then select ONADE. Some examples when official consults might be necessary are to request feedback from the ONADE Policy Team for legal issues raised by a potential applicant in a meeting request or when feedback from a Senior Scientist is needed regarding complex bioequivalence issues. However, the reviewer should first discuss with the Policy Team or Senior Scientist prior to creating the official consult in Appian.

Requests for a consult from the Office of the Director (HFV-100) include:

- Policy Team (HFV-101)
- Senior Scientist Team

VI. ROUTING A REQUEST TO THE DIVISION OF ANIMAL BIOENGINEERING AND CELLULAR THERAPIES (HFV-106)

A request for a consult for the Division of Animal Bioengineering and Cellular Therapies (HFV-106) can also be routed to the appropriate team in the division using the Appian Consult Request workflow as follows:

- If the submission pertains to animals containing intentional genomic alterations (IGAs) or other biotechnology products (e.g., siRNA products), then the submission should be routed to the Animal Biotechnology Team (HFV-108).
- If the submission pertains to animal cells, tissues, or cells- and tissue-based products, then the submission should be routed to the Cell and Tissue Products Team (HFV-109).

VII. ROUTING A REQUEST FOR A CHEMISTRY, MANUFACTURING, AND CONTROLS CONSULT (HFV-140)

A request for a Chemistry, Manufacturing, and Controls (CMC) consult is routed to the appropriate team in the Division of Manufacturing Technologies (HFV-140) as follows:

A. NADAs and INADs

- If the submission pertains to a major species for a medicated article or feed (i.e., Type A medicated article, Type B medicated feed, and Type C medicated feed) or a topical product, the submission should be routed to the Feed/Topical Team (HFV-141).
- If the submission pertains to a sterile drug product (i.e., injectable or ophthalmic products), the submission should be routed to the Antimicrobial Team (HFV-142).
- If the submission pertains to an oral dosage form (i.e., tablet, oral solution, etc.), the submission should be routed to the Chemotherapeutics Team (HFV-143).
- If the submission pertains to a biological/biotechnological or competitive exclusion derived drug product, a Minor Use Minor Species drug product, a soluble powder (major and minor species), non-sterile injectable (i.e., euthanasia products), or inhalant the submission should be routed to the Biotherapeutics Team (HFV-144).

B. ANADAs and JINADs

- If the submission pertains to a sterile injectable drug product, the submission should be routed to Generic Review Team I (HFV-145).
- If the submission pertains to an oral dosage form (i.e., tablet, capsule, oral solution, etc.), or a topical drug (i.e., ophthalmic, otic, dermatologic), the submission should be routed to Generic Review Team II (HFV-146).
- If the submission pertains to a major species for a medicated article feed (i.e., Type A medicated article, Type B medicated feed, and Type C medicated feed) or a soluble powder, the submission should be routed to Generic Review Team III (HFV-147).

C. Veterinary Master File, or Review of a (A)NADA or (J)INAD Specifically for the Review of a Veterinary Master File

- If the submission pertains to the review of a drug substance/API or Type II veterinary master file, the submission should be routed to the Drug Substance Matrix Review Team (HFV-148).

VIII. ROUTING A REQUEST FOR A HUMAN FOOD SAFETY CONSULT (HFV-150)

If a new animal drug is intended for use in food-producing animals, the submission is sent for a consult to the Division of Human Food Safety (HFV-150).

A. Microbial Food Safety (Antimicrobial Resistance)

If the submission contains antimicrobial resistance-related information (e.g., protocols, study reports, supporting literature, etc.) or is an application for new antimicrobial drugs or changes to previously approved antimicrobial drugs, send the request to the Microbial Food Safety Team (HFV-157).

B. Toxicology

If the submission contains toxicology-related information (e.g., general toxicology, genetic toxicology, reproductive toxicology studies, information or data on the effects of residues on human intestinal flora, etc.), send the request to the Toxicology Team (HFV-153).

C. Residue Chemistry

If the submission contains residue-related information (e.g., studies and summaries of studies pertaining to presence and identification of residues in edible tissues, metabolism studies in the target species, comparative metabolism studies in the toxicological species, residue depletion studies in the food-producing animal, analytical methods for detection or identification of residues in the target animal, send the request for review to the Residue Chemistry Team (HFV-151). For ANADAs/JINADs where the generic new animal drug product is proposed for use in food-producing animals and no studies were performed (i.e., waived products), send the consult request to the Residue Chemistry Team (HFV-151).

D. Multiple Human Food Safety Components

For all non-Z submissions that contain information applicable to more than one team in HFV-150, send a single request for a consult to HFV-150. They will route it, as appropriate, within the division. This includes food-use authorizations.²

For all Z submissions (unless specifically directed to one team), route three separate requests to HFV-150 (e.g., A1, B1, and C1) – one to HFV-151 (residue

² Refer to P&P 1243.4040 and P&P 1243.4041 for more information regarding investigational food-use authorizations

chemistry), one to HFV-153 (toxicology), and one to HFV-157 (antimicrobial resistance).

E. User Safety and Residual Solvents/Impurities

User safety, residual solvent, or impurity consult requests should not be automatically routed to HFV-150. The PR should examine this information themselves and request a consult, if needed. Refer to the information contained in the ONADE Scientific Resource Document 1243.130.001 on the human user safety assessment.

IX. ROUTING A REQUEST FOR AN ENVIRONMENTAL IMPACT CONSULT (HFV-162)

If the submission contains information related to the environmental impact technical section or a request for categorical exclusion from preparing an environmental assessment, send the consult request to the Environmental Safety Team (HFV 162). Refer to information contained in P&P 1243.7220.

For ANADAs (full approval applications) where the Environmental Impact technical section has not been reviewed and found complete in a prior ANADA or JINAD within the previous 5 years, send the consult request to the Environmental Safety Team (HFV 162). For supplemental ANADAs (NF or NL³), refer to ONADE SOP 1243.162.002 for further instruction on the evaluation of categorical exclusion requests.

X. ROUTING A REQUEST FOR A STATISTICAL CONSULT (HFV-163, HFV-164 AND HFV-165)

If the submission contains statistical analysis information (i.e., protocol or data submissions), send the consult to the appropriate Biostatistics Team (HFV-163, HFV-164, or HFV-165).

A. Biostatistics Team 1 (HFV-163):

Drug/Study Types: antiparasitics in companion animals (from HFV-118), drugs for reproduction, weight control, and appetite stimulation; and drugs for endocrine (e.g., thyroid, diabetes), cardiovascular (blood pressure, heart), ophthalmic, hematology, and renal/urinary disorders. Team 1 also reviews animal bioengineering and cellular therapies in these indications, as well as environmental and human food safety studies.

B. Biostatistics Team 2 (HFV-164):

Drug/Study Types: antiparasitics in companion animals (from HFV-112), antiparasitics for production animals (except fish), and immunosuppressants; drugs for pain, epilepsy, and for neurological, dermatological, otic, and muscular disorders. Team 2 also reviews animal bioengineering and cellular therapies in the above indications.

³ Changes being effected Non-fee Labeling Supplements (NL) and Prior approval Labeling Supplements Non-Fee Labeling (NF) are described in P&P 1243.6020 and P&P 1243.6040

C. Biostatistics Team 3 (HFV-165):

Drug/Study Types: generic drugs, antimicrobials (for respiratory [BRD, SRD] and other infections), and antivirals; drugs for cancer, pyrexia, gastrointestinal disorders (e.g., ulcers, nausea, vomiting), and respiratory (not microbial) disorders; and drugs to induce euthanasia or sedation. Team 3 also reviews production drugs and fish drugs (all indications), and animal bioengineering and cellular therapies that fall under the above indications.

XI. ROUTING A REQUEST FOR A PHARMACOKINETICS CONSULT (HFV-166)

For INADs/NADAs, if a submission contains information pertaining to the pharmacokinetics (PK) of the new animal drug (e.g., PK studies, proposed plasma drug concentration sampling times), a PK consult may be requested. For JINADs/ANADAs, if a submission contains information that raises concerns with drug pharmacokinetics (i.e., bioequivalence study design for a long acting new animal drug, the effect of indwelling catheters and catheter flushing on plasma samples), a PK consult may be requested. Refer to the information contained in ONADE SOP 1243.166.001 for more details. Send the consult request to the Clinical Pharmacology Team (HFV-166).

XII. ROUTING A REQUEST FOR A TARGET ANIMAL DIVISION (TAD) CONSULT

The PR sends requests for consults from a TAD reviewer for various types of submissions when needed. Some examples for when a consult might be needed would be for requests to attend sponsor meetings, CMC supplements with labeling, end game meetings,⁴ etc.

A. Companion Animal and Wildlife Products are Reviewed by the Division of Therapeutic Drugs for Companion Animals (HFV-110).

1. Team 1 (HFV-112) reviews anti-parasitics (split with HFV-118), endocrine, dermatologic, respiratory drugs, reproductive drugs, and euthanasia agents.
2. Team 2 (HFV-114) reviews analgesics/anti-inflammatory drugs (osteoarthritis and disease-modifying osteoarthritis drugs), cellular therapy agents, blood products, antimicrobials, and most equine drugs.
3. Team 3 (HFV-116) reviews anesthetics, sedatives, analgesics (Post-operative pain), gastrointestinal, oncologic, recombinant technology, and renal/urinary drugs.
4. Team 4 (HFV-118) reviews anti-parasitics (split with HFV-112), neurology, cardiac, otic, ophthalmic, anti-virals, and behavior drugs as well as drugs for wildlife.

⁴ Refer to P&P 1243.3051 regarding the End Game

B. Food Animal Therapeutic Drugs, Production Drugs, Combination New Animal Drug Applications Seeking Approval Under the Animal Drug Availability Act (ADAA), Aquaculture Products, and Superovulation Products are Reviewed by the Division of Therapeutic Drugs for Food Animals (HFV-130).

1. Aquaculture Drugs Team (HFV-131)
2. Antimicrobial Drugs Team (HFV-133)
3. Antiparasitic and Physiologic Drugs Team (HFV-135)
4. Growth, Endocrinology, and Metabolism Team (HFV-137)

C. Abbreviated New Animal (Generic) Drugs are Reviewed by the Division of Generic Animal Drugs (DGAD) (HFV-170)

The DGAD has four multi-disciplinary teams (HFV-171, 172, 173, and 174), consisting of veterinarians, chemists, pharmacists/pharmacologists and biologists. The DGAD relies heavily on internal consults for all aspects of its JINAD/ANADA bioequivalence studies (data quality, clinical veterinary data, bioanalytical methods, dissolution methods).

1. Review Team 1 (HFV-171)
2. Review Team 2 (HFV-172)
3. Review Team 3 (HFV-173)
4. Review Team 4 (HFV-174)

XIII. ROUTING A REQUEST FOR A CONSULT FROM THE QUALITY ASSURANCE TEAM (HFV-184)

A. Quality Control Review of Documents Being Signed by the Office or Center Director

If a Quality Control review for documents that are signed by the Center Director and/or Office Director (e.g., RTR/RTF letters, approval packages and investigational food-use authorizations) is needed from the Quality Assurance Team, refer to the procedures in P&P 1243.3210.

B. Quality Assurance Study Review of Data Quality

If a Quality Assurance Study Review is needed for the evaluation of data quality, then a consult from the Quality Assurance Team should be requested according to the procedures in P&P 1243.3215.

XIV. ROUTING A REQUEST TO THE PROJECT MANAGEMENT TEAMS (HFV-186 AND HFV-187)

For INAD/NADA submissions, there are infrequent situations that a consult may be requested from the project management teams. An example of a situation would be to request that a project manager (PM) attend a pre-INAD meeting to go over the new animal drug approval process with the sponsor. If a project management consult is needed, check the SharePoint list showing which PMs are assigned to which sponsors to determine which PM team should receive the consult.⁵ If this cannot be determined from the information in SharePoint, contact one of the PM team leaders or send the consult to HFV-180.

XV. ROUTING LABELING CONSULT REQUESTS

For review of labeling changes in manufacturing supplements, the appropriate target animal division in Section XI should be consulted based on the information submitted in the A(NADA) application. Refer to the information contained in P&P 1243.6030 for information on manufacturing supplements.

For all INAD/JINAD labeling (M) submissions,⁶ original (A)NADAs⁷ and B1⁸ supplements the PR sends requests for labeling consults to:

- Post-Approval Review Team (HFV-216) in the Office of Surveillance and Compliance (OSC)'s Division of Surveillance for all new animal drug labels (except Type A medicated articles and Type B and C medicated feeds). For JINAD/ANADAs, consult all JINAD G (general correspondence for labeling) or M (Labeling technical section) submissions to the Post-Approval Review Team (HFV-216) for proprietary name and/or trade dress review, as applicable.
- If the labeling is for an original or B1 supplemental NADA Type A medicated articles and/or Types B and C medicated feeds, send the request for a consult to the Medicated Feeds Team in the Division of Animal Feeds (HFV-226).
 - A consult to the Medicated Feeds Team (HFV-226) is typically not required for ANADA Type A medicated articles or Types B and C medicated feeds and are requested in very limited circumstances. Consult with your TL, if you think that a consult to HFV-226 may be necessary.
- The appropriate team in the Division of Manufacturing Technologies as stated in Section IV above.⁹

⁵ Internal information redacted.

⁶ Refer to P&P 1243.4080 for information regarding the Labeling Technical Section

⁷ Refer to P&Ps 1243.6020 and 6040 for information on the process for NL and NF submissions

⁸ A B1 supplement is one in which safety and/or effectiveness was evaluated. An example of an ANADA B1 supplement would be when the sponsor of an ANADA adds an indication or species that is not approved for the reference listed new animal drug product.

⁹ A consult to the Division of Manufacturing Technologies should always be requested for JINAD M submissions, even if the CMC section has already been determined to be complete.

- Division of Human Food Safety (if it is a new animal drug used in food-producing animals).

XVI. ROUTING A REQUEST TO THE DIVISION OF VETERINARY PRODUCT SAFETY (HFV-240)

To request an Adverse Drug Experience (ADE) and Product Defect (PD) review, the PR should route a consult to the Division of Veterinary Product Safety (DVPS). A Brief Adverse Event Review (typically takes 21-30 days) or Standard Adverse Event Review (typically takes 60-90 days) can be requested.

If a generic sponsor requests to open a JINAD for a reference listed new animal drug (RLNAD) that is no longer marketed, create a Q submission under the RLNAD using the ONADE Create Q Submission workflow in Appian. Send a request to DVPS to confirm that it was not withdrawn from the market due to safety or effectiveness reasons. See P&P 1243.3250 for more information on Q submissions.

The consult is created by completing the DVPS ADE and PD consult request form. The consults are not requested through Appian. The consult request form and instructions are found on the ONADE Forms SharePoint site.¹⁰

XVII. REFERENCES

CVM Program Policies and Procedure Manual – ONADE Reviewer’s Chapter

1243.3026 – Assessing Submission Quality and Amending and Resetting the Clock on Submissions

1243.3051 – Verifying Scope and Technical Section Status for Phased Review Investigational New Animal Drug (INAD) Projects in the End Game

1243.3100 – Beta Test ONADE Refuse to Review (RTR) and Refuse to File (RTF) Assessments of Submissions and Applications That Contain Data

1243.3210 – Requesting a Quality Control Review from the Quality Assurance Team for Final Action Packages Signed by the Office or Center Director

1243.3215 – Requesting a Quality Assurance Study Review from the Quality Assurance Team

1243.3250 – “Q” Submissions: Agency-Initiated Actions

1243.4040 – Investigational Food-Use Authorizations: The Role of the Target Animal Division Reviewer

1243.4041 – Investigational Food-Use Authorizations: The Role of the Division of Human Food Safety Reviewer

¹⁰ Internal information redacted.

1243.4080 – Labeling and All Other Information Technical Sections (Minor Technical Section or M Submissions)

1243.6020 – Review of New Animal Drug Application and Abbreviated New Animal Drug Application Supplements (NL Subclass)

1243.6030 – Review of Labeling Changes in Manufacturing Supplements

1243.6040 – Review of Abbreviated and New Animal Drug Application 60- and 180-day Non-Fee Prior Approval Labeling Supplements

1243.7220 – Processing Environmental Impact Submissions for New Animal Drugs

ONADE Standard Operating Procedures and Scientific Reference Documents

CVM SOP 1243.166.001 - Clinical Pharmacology Team (HFV-166) Involvement and Communications During the Project Lifecycle

CVM SOP 1243.162.002 – Beta Test Standard Operating Procedures and Boilerplate Language for Environmental Impact Evaluations of Categorical Exclusions for the Office of New Animal Drug Evaluations

CVM SRD 1243.130.001 – Human User Safety Assessment

XVIII. VERSION HISTORY

November 16, 2001 - Original version

December 19, 2007 – Version updated to remove sections now in the approval package P&P 1243.3800. Also reformatted and brought up to date regarding processing of labeling supplements.

November 2009 - The instructions for requesting a consulting review were updated to reflect current procedures and now include instructions regarding consults for ERAs.

August 31, 2012- The P&P was updated to include the routing of consults to the biostatistics teams and to reflect the changes due to the electronic environment.

November 2, 2012 – Updated to reflect that parent submissions do not need to be consulted with ERAs.

July 2, 2013 – Updated with additional division/team information, the use of an Outlook template to request consults, and to reflect the unified Center procedure for using Appian to return consults.

April 8, 2014 – Updated to reflect the Appian Create Consult workflow process.

June 13, 2014 – Updated to current format.

July 5, 2016 – Updated to current format and redacted internal information for internet version.

November 26, 2018 – Removed end-review amendment process and updated with current information.

January 17, 2019 – Updated references to reflect the P&P 1243.4090 for human user safety assessment is now a CVM ONADE Scientific Resource Document and is found on the ONADE Standard Operating Procedures and Resource Documents SharePoint page.

May 9, 2019 – Updated information on the teams within HFV-160 and HFV-170.

August 19, 2019 – Updated to change the Animal Bioengineering and Cellular Therapies Team to the Division of Animal Bioengineering and Cellular Therapies and include their associated mail codes. Also updated to change the mail code for the ONADE Policy Team from HFV-108 to HFV-101. Updated titles of some references.

April 7, 2020 – Updated to change the information for the Division of Human Food Safety (DHFS) in section VIII. Consults for human intestinal flora were being sent to the Microbial Food Safety Team and the document has been revised to reflect that those consults are to be sent to the Toxicology Team (HFV-153) in DHFS.

June 30, 2020 - Updated all internal links for SharePoint sites because FDA has migrated this information to a new version of SharePoint.

January 11, 2021 – Updated to reflect renaming of divisions HFV-110 and HFV-130 and to reflect reorganization that resulted in merging of HFV-120 into HFV-130. HFV-120 no longer exists and subject matter experts formerly in HFV-120 are now in HFV-130. Products formerly reviewed by HFV-120 are now reviewed in HFV-130.

April 21, 2021 – Updated to add information on sub-consults to section II. This information was originally in P&P 1243.3029 which is the P&P for how to close out a consulting review.

May 3, 2021 Updated section II to include information about providing instructions in the consult request for the consulting reviewer. Language was added to suggest the primary reviewer include a reminder in the automated email sent by Appian that suggests the assigner of the consult forward the Appian email to the consulting reviewer assigned the submission.