

## SIF/RA Processing for Biotechnology-derived Products:

1. Summary Information Format (SIF) and Risk Assessment documents (initial and revised) are submitted by a firm wanting to license a biotechnology-derived product. For a live recombinant vaccine, the firm also submits a Risk Analysis (RA) consisting of the most current versions of the SIF and Risk Assessment with proposed redactions of confidential business information (CBI) highlighted in yellow. When approved, the RA with blackened redactions will be posted in the *Federal Register* (FR) docket with the Notice announcing pending field trials. The SIF is constructed according to the outlines and examples found at the following website: [https://www.aphis.usda.gov/aphis/ourfocus/animalhealth/veterinary-biologics/biologics-regulations-and-guidance/ct\\_vb\\_sifs](https://www.aphis.usda.gov/aphis/ourfocus/animalhealth/veterinary-biologics/biologics-regulations-and-guidance/ct_vb_sifs). In addition, there is an outline for the Risk Assessment to be conducted by the firm, available on the CVB website and on the NCAH Sharepoint site (PEL Reviewers Manual, Section 4.12.2, “Outline for content of Risk Analyses”).
2. The first biotech document to arrive at CVB should be the SIF, preferably with information complete enough to allow the Institutional Biosafety Committee (IBC) to evaluate safety and the CVB Laboratory to initiate confirmatory testing. By this time in the prelicense process, there should be a product code assigned to the biotech-derived candidate for licensure. Upon receipt of the Mail Log entry, the Reviewer sends a ‘child-loop’ notice to the Risk Manager (RM).
3. The RM prepares the IBC request and sends the application to the appropriate Section Leader (SL), with a copy to the IBC Chair. If approved, the IBC request is signed by the SL and the PEL Director, and submitted to the IBC Chair who sends it to the IBC. If approved by the IBC, the IBC approval letter and number are sent to the SL, and copied to the RM, Lab staff representative, and Reviewer.
4. The Lab staff reviews the SIF and Master Seed (MS) Test Report and prepares a test plan for the proposed lab characterization, including resources that will be needed for lab characterization. After the plan is developed, the Lab provides the Special Request (SR) number for testing to the Reviewer. The electronic sequence data submitted by the firm is entered in the Mail Log and stored on the network, (FS11\PEL) W://Data/<mail log #>.
5. When additional information is requested by the RM in order to approve the SIF, the RM informs the Reviewer when the requested information is provided and is satisfactory. If the original SIF is approved, but additional information is requested for inclusion in the next SIF submission (as part of the Risk Analysis), the RM informs the Reviewer when the updated SIF is provided.
6. The SIF/RA Worksheet (Reviewer Manual, Section 4.12.3) is given to the Biotech LIE for entry into the Biotech SIF/RA database, which tracks recombinant MS processing for future reference.
7. Upon completion of testing, the Lab provides a report to the Reviewer and to the RM.
8. The RM reviews the risk assessment for issues regarding animal, human, and environmental safety and may request public health or subject matter experts to review firm-authorized information, as necessary. Peer reviewers have up to 30 days to provide comments. The RM, Reviewer, and SL determine whether significant issues have been raised by the comments. The firm is notified if they must do additional studies to resolve the issues, if they must address the issues in the RA, or if the RA is adequate for FR notification.

9. When the RA is sufficient for FR publication, environmental assessment (EA), FR Notice, and Finding of No Significant Impact (FONSI) drafts are prepared by the RM. For inactivated biotechnology-derived products, the Risk Assessment submitted by the firm should show that the biological is properly characterized and inactivated, but there is no requirement for an FR Notice.
10. When the field trial protocol is submitted, the Reviewer requests approval letters from the pertinent State veterinary authorities. CVB approval of the field trial protocol and State authorizations and acknowledgements of the pending trials are required prior to submission for FR publication.
11. The RM will provide the EA, FONSI, and FR Notice to the Reviewer and to the firm requesting review for CBI and accuracy. If there are questions about suitability, the RM, firm, and Reviewer will discuss the issues as necessary. The draft EA, FONSI, and FR Notice will be reviewed for consistency with previous documents.
12. Following acceptance, the RM will submit the EA, CBI-redacted RA, and draft FR Notice to the Operational Support staff in Riverdale for publication. A copy of the documentation will be retained by the RM for response to requests for information. The RM will ensure that copies are retained in the Biotech Master file.
13. At the end of the comment period, the RM will evaluate comments for possible further action and inform the Reviewer, SL, and PEL Director regarding significant issues that were raised. When comments are satisfactorily addressed, the PEL Director signs the FONSI. The original is filed in the Biotech Master file, with copies to the Reviewer and the firm. If adverse events are detected during the field trial, the Reviewer notifies the RM.
14. The SIF/RA Worksheet (Reviewer Manual, Section 4.12.3) information is given to the Biotech LIE for further SIF/RA database entry.
15. For live biotech-derived vaccines, a final updated SIF should be submitted to the RM, containing a summary of data from the field trial. This may be added to the SIF in Section I.B.1.e. (“Brief description of the expected safety profile”) and as an Appendix, where more information is reported. The RM will maintain a Biotech Master file containing the most recent copy of the SIF, the Risk Assessment, the RA, and the CBI-redacted RA for each Master Seed. Also, the EA, FR Notice, and original FONSI will be maintained in that file.