Process for Prelicensing Inspection Requests

The Center for Veterinary Biologics-Policy, Evaluation, and Licensing (CVB-PEL) requests prelicensing inspections based on information received from the applicant. The inspection is to determine if the personnel, facilities, equipment, and processes are appropriate for the product considered for licensure. The request to inspect is not made by the applicant.

Documents required <u>prior to</u> requesting a prelicensing inspection:

1. APHIS Form 2001 or 2003
    a. Addresses of all manufacturing, testing, and storage sites should be entered in LSRTIS
    b. Sites should be marked as Active
2. Reviewed Outline of Production (OP) with PEL comments
3. Facility Documents – preliminary review by Specialist against information listed in the filed OP
4. APHIS Form 2007
    a. Including Contact Information
    b. Key site personnel entered in LSRTIS (especially for foreign sites, including phone and email)
5. Summary Information Format for the Importation of Veterinary Biological Products into the United States (for permittees only)

When to request a prelicensing inspection depends on many factors, including previous biologics experience of the applicant, appropriate facilities, and novelty of the product.

A prelicensing inspection of the facilities, equipment, processes, and personnel must be completed prior to the issuance of the establishment license or permit. If it has been longer than 2 years since the prelicensing inspection, a second prelicensing inspection most likely will need to be done prior to issuance of the establishment license or permit.

In all cases, an OP should be on file with CVB. Sections I through IV should be complete or very close to complete. Sections V and VI are important, but many times final release criteria and expiration dating are not determined until after the prelicensing inspection.

The OP is used as a guide when determining sufficiency of processes to prepare consistent product. Also, it can determine what type of equipment is needed for production. It defines the master seeds/cells to be used and if there are ingredients of animal origin. A SIF for importation of Veterinary Biological Products is also used as a part of the pre-inspection process, especially concerning ingredients of animal origin.

Process for Prelicensing Inspection Requests

The following are guidelines of when to perform a prelicensing inspection.

1. After preparation of an efficacy serial or prototype serial that is not one of the prelicensing serials – in some cases this may be after the data from an efficacy study has been submitted and reviewed by CVB-PEL.

This timing would be most important for new technologies, for applicants with no previous biologics experience, or for applicants whose facility is communal in nature (Research Park, university bio-incubator laboratories). It would allow an assessment of the personnel, processes, equipment, facilities, and recordkeeping in regard to the preparation of the product. In some cases, the applicant does not have sufficient regulatory knowledge and can make costly errors. If this is determined early in the process, the appropriate actions can be taken by the applicant to remedy the situation. Most times these types of facilities may require two prelicensing inspections.

2. After a successful efficacy study in which the data has been reviewed and accepted by CVB.

This would best apply to products moving through the licensing plan as expected and the product is very expensive or labor intensive. An inspection after the efficacy serial but before prelicensing serials may identify issues with personnel, processes, equipment, facilities, or recordkeeping that could be corrected. If an issue is identified that may bring into question the purity or safety of a product, it can be addressed before the expense of manufacturing prelicensing serials. Also, if the manufacturing process is not clearly documented or there are variations in the process from the filed OP, these can also be addressed and there is less ambiguity concerning the production process of the serial used in pivotal efficacy studies.

3. Preparation of one prelicensing serial

This scenario best applies if the facilities are “traditional” stand-alone facilities, the product has been made for another market (usually applicable for international manufacturers), and the personnel have previous experience with similar regulatory statutes. The expectation is they understand what is expected and have complete documentation of the processes used in the preparation, testing, labeling, and distribution of products in a regulatory atmosphere.

This can also be applied to newer technologies in which the entity is already a licensed/permitted establishment, but the processes may be new.

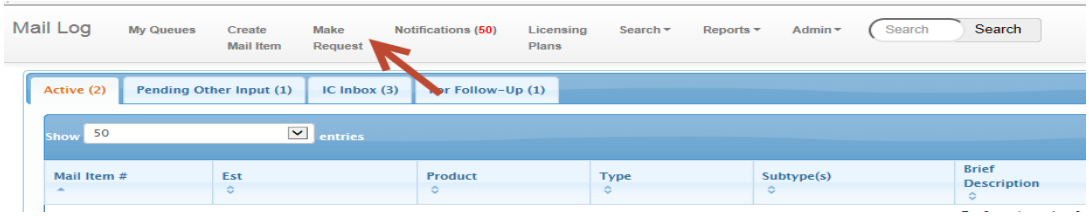
Process for Prelicensing Inspection Requests

How to request a Prelicensing Inspection:

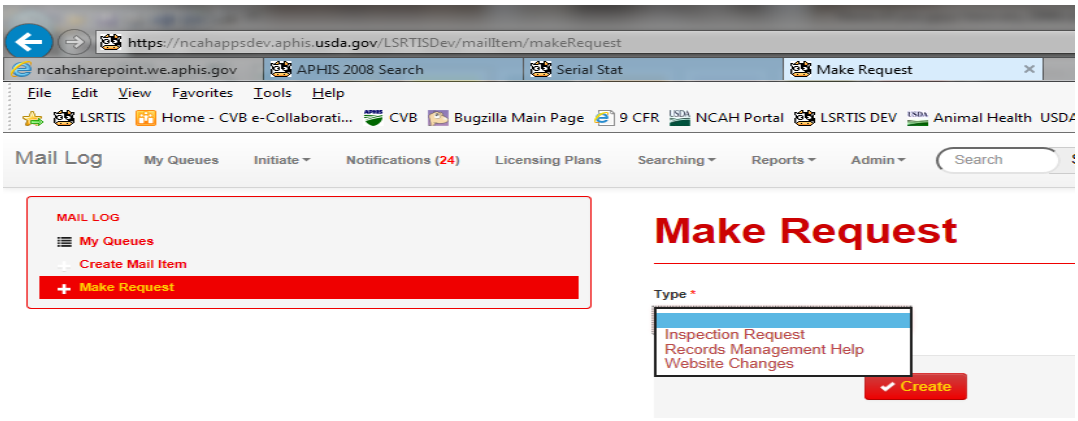
1. Reviewer – Submit a request through the Request Log module in LSRTIS, Mail Log (ML). Reasons for special inspection requests from PEL typically are for Prelicensing, New Facility, Efficacy Studies, Field Studies, Duration of Immunity Studies, or Bench Record Review. Other special types may be chosen as well, but should be explained in the brief descriptions.

Initiate an Inspection Request

1) Log into LSRTIS, Mail Log
2) Choose **Make Request**



3) Type = Inspection Request



4) Fill in following fields
   a. Establishment - mandatory
   b. Establishment Site - mandatory
   c. Additional Sites (Ancillary Sites to 5.b.) – not mandatory
   d. Product/Serial (if applicable)
   e. Special Inspection Type - mandatory
   f. Informationally Linked Mail Item (if there is relevant info pertaining to inspection request in other ML items)
   g. Brief Description – detailed reasons for inspection

5) Create Attachment
   Not usually necessary, unless user would like to provide more info than what is available in brief description
   If no attachment – choose "Cancel."

6) At this point, the Mail Log Request moves to the Inspection Requests Pool automatically. User can still update though.

2. Inspection and Compliance Section Leader – Review Request

1) The Inspection Section Leader (SL) will be notified of a request – it is in a Tab in the Mail Log (ML) queue, labeled Inspection Requests.
2) The ML is "self-assigned" and moved to Inspection Section Leader ML queue.
3) The request is reviewed by the SL.
   a. If **APPROVING** –
      i. Edit ML Brief Submission Description – add APPROVED and initials
      ii. Move ML forward to "Workflow completed – No Records Management. Click "OK."
      iii. The Requestor will receive an email.


Reply Reply All Forward IM

Thu 8/25/2016 3:04 PM

DoNotReplyLSRTISRewriteDVMT@usda.gov

Inspection Request Updated

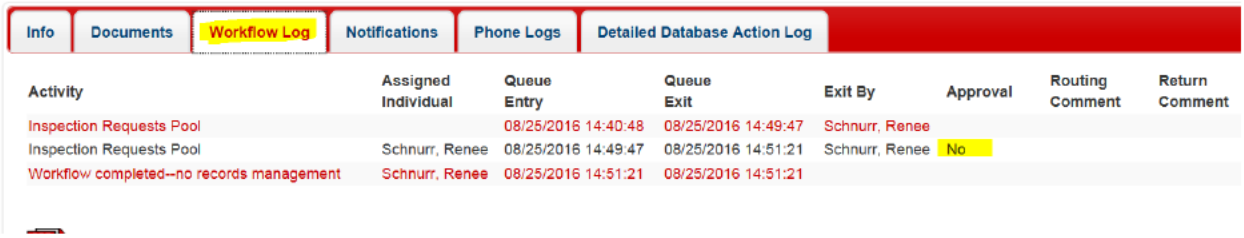
To Schnurr, Renee M - APHIS

Hello!

Inspection Request (ML# 176507) has been accepted by the Inspection Section Leader.
The inspection request has been placed in the recommended inspection list until it has been scheduled by Inspection and Compliance.
Comments: null

https://ncahappsdev.aphis.usda.gov/LSRTISDev/index

      iv. At approval, this will move automatically to the Recommended for Inspection tab, and no longer show in ML queues.
      v. If a Specialist and Biologics Compliance Assistant (BCA) are not assigned, SL will assign and designate both roles in LSRTIS for the prelicensed entity.
   b. If **DENYING** –
      i. Edit ML Brief Submission Description – add DENIED and initials
      ii. Move ML forward to "Workflow completed – No Records Management. Click "Cancel."
      iii. The Workflow Log will indicate the request was not approved.



Info | Documents | Workflow Log | Notifications | Phone Logs | Detailed Database Action Log

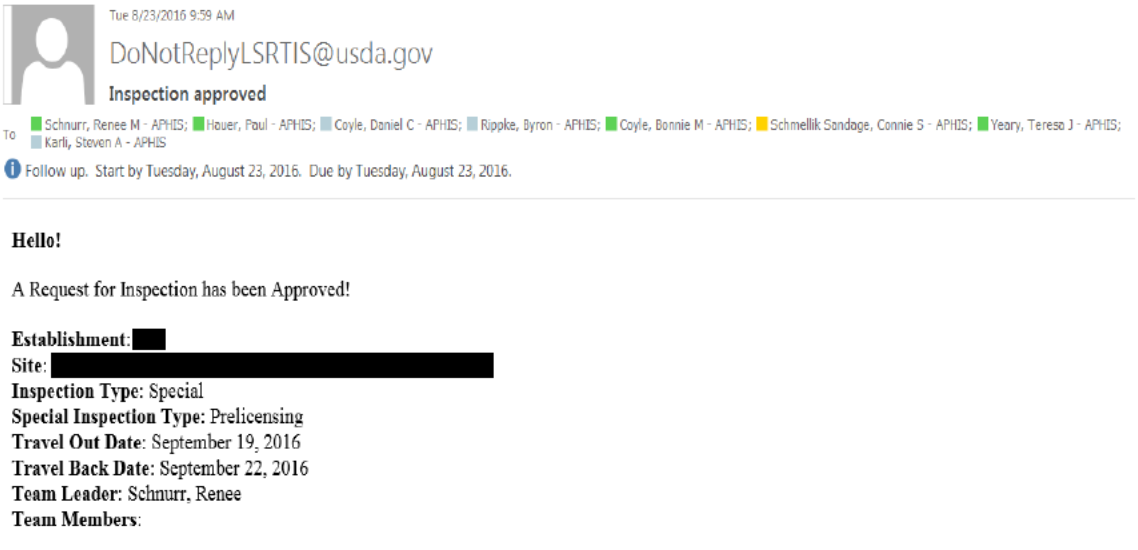
Activity	Assigned Individual	Queue Entry	Queue Exit	Exit By	Approval	Routing Comment	Return Comment
Inspection Requests Pool		08/25/2016 14:40:48	08/25/2016 14:49:47	Schnurr, Renee			
Inspection Requests Pool	Schnurr, Renee	08/25/2016 14:49:47	08/25/2016 14:51:21	Schnurr, Renee	No		
Workflow completed--no records management	Schnurr, Renee	08/25/2016 14:51:21	08/25/2016 14:51:21				

iv. The SL will also discuss this action with the Reviewer who requested the inspection. No email is sent as this should be a discussion.

c. If request is not complete –
   i. SL will work with Reviewer and manufacturer to ensure all documents are in order and the timing is correct for the purpose intended.
   ii. Once all information is complete – the SL will move through Step 3.a above.

3. Specialist – Schedule Inspection

1) The Inspection Module will show requested info in the Recommended Inspection TAB.
   a. The ML #, hyperlink to the actual ML request from PEL.
   b. The Est #, hyperlink is a summary of the request from PEL
2) The Specialist will contact the entity and schedule a time for the inspection.
   a. This Phone Log will be attached to the Inspection Request ML – use hyperlink in Recommended Inspection TAB module.
   b. The Specialist will Schedule the inspection in LSRTIS
3) The SL will approve the inspection in LSRTIS – at the time of approval the Reviewer assigned to the firm will receive an email notification.



Tue 8/23/2016 9:59 AM

DoNotReplyLSRTIS@usda.gov

Inspection approved

To Schnurr, Renee M - APHIS; Hauer, Paul - APHIS; Coyle, Daniel C - APHIS; Rippke, Byron - APHIS; Coyle, Bonnie M - APHIS; Schmellik Sandage, Connie S - APHIS; Yeary, Teresa J - APHIS; Karli, Steven A - APHIS

Follow up. Start by Tuesday, August 23, 2016. Due by Tuesday, August 23, 2016.

Hello!

A Request for Inspection has been Approved!

Establishment: [redacted]
Site: [redacted]
Inspection Type: Special
Special Inspection Type: Prelicensing
Travel Out Date: September 19, 2016
Travel Back Date: September 22, 2016
Team Leader: Schnurr, Renee
Team Members:

Process for Prelicensing Inspection Requests

Search for Inspection Request or Scheduled Inspection

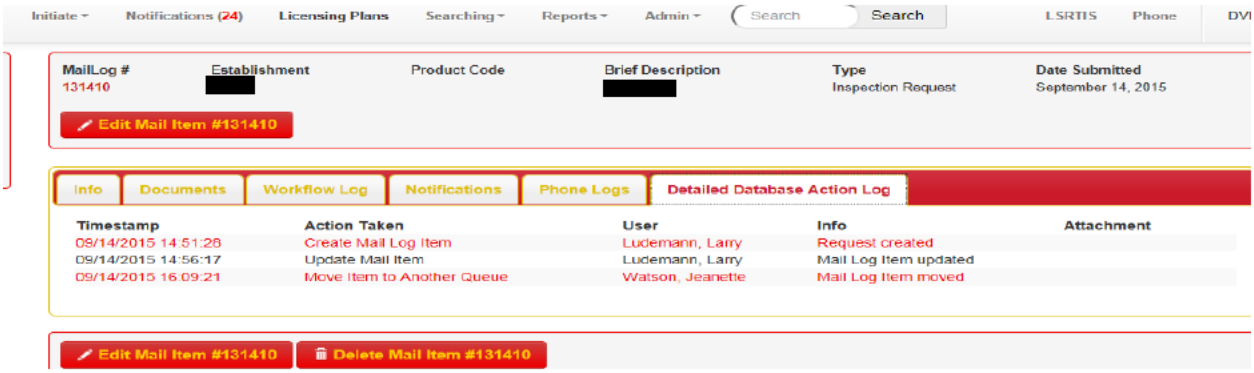
Information regarding Inspection Request can be retrieved either through the ML Module or the LSRTIS Inspection Module

ML Module – Use Master Search in ML

1. Enter Establishment (if searching for a specific entity)
2. Enter "Inspection Requests Pool" under Activity.
3. Approved? Yes/No

This will give you a listing of related ML # and Status. Completed means an action has been taken and ML has been closed. If a ML is still Active – please contact the Inspection SL.

NOTE:
The requestor is not going to be in the search – but he/she will show in the "Detailed Database Action Log."



The inspection Status can be determined by searching in LSRTIS-IC-Inspections.

1. Inspections Dashboard – Inspection Search: Enter Establishment Number and click on Search
2. Click on Info for the inspection you are interested in.

3. This brings up the Show Inspection screen that includes information regarding the inspection, including an Action History of requests, modifications, and approvals.