

## Conditional Serial Release

A Conditional Release allows authorized users to release a serial prior to the completion of testing or the sample selection period and is granted when there is an emergency need (only product available, expedite export, national program disease) and on the condition that the serial is subject to immediate recall by the Center for Veterinary Biologics (CVB) if tested and found unsatisfactory. Samples and APHIS Form 2008 (Form 2008) must be received by the CVB prior to a serial being considered for Conditional Release. A written request from the firm (letter) must accompany the Form 2008 being considered for a conditional release. A fax of a letter can be accepted to expedite the process, but a hard copy original signature letter must follow. The fax will be CBI'd and the original letter becomes CVB-Inspection and Compliance's (CVB-IC) official copy for filing.

### Conditional Release

Conditional Release creates an additional parallel path to the normal Form 2008 workflow (first leg). The normal workflow (final leg) will not be affected.

Fill out **ICFRM0010**, *Serials Ready for Conditional Action*, for process/approval steps along with performing the proper LSRTIS Actions.

1. Requesting/Authorizing the Conditional Release:
  - a. The Specialist completes Items 1 through 3 of the worksheet when a request has been received.
  - b. The Specialist will select the type of release required depending on the sample status (within the at-risk period or on test) in Item 4 of the worksheet.
  - c. Within LSRTIS, the Specialist will choose "Conditional Release" within the LSRTIS laboratory action subcategory.
  - d. The Specialist should sign the form, and then obtain proper approval within LSRTIS. A notification to the IC Section Leader should occur.
2. Approving the Conditional Release:
  - a. The IC Section Leader, or designate, will Approve the Conditional Release.
  - b. Select either "Approved" or "Denied" depending on the action needed within LSRTIS, Product Manager Review Tab, Conditional Releases.
    - The first leg of the conditional release Form 2008 will then move to BCA Ready for Approval area, if approved by Section Leader.
    - If the conditional release is Denied, the "first leg" Form 2008 will be complete and no further action is necessary for the first leg. The "final leg" or now the original Form 2008 will wait for the at-risk window or testing to be complete.
3. Processing the Conditional Release:
  - The Biologics Compliance Assistant (BCA) makes two copies of the Form 2008 (if it came in hard copy). This will be the "first leg" of the conditional release. Check "Other" in Block 16 of the Form 2008 if hard copy.
  - If the serial is under test by our lab, type on the hard copy Form 2008, "May be released, subject to immediate recall should this serial, now under test by

## Conditional Serial Release

APHIS, be found unsatisfactory. See letter from \_\_\_\_\_ dated \_\_\_\_\_.”  
This may also be typed a Release Criteria within LSRTIS. See below.

- If the serial has not been selected for testing and still is in the testing selection timeframe, type on the Form 2008 or Release Criteria, “May be released, subject to immediate recall should this serial, if tested by APHIS, be found unsatisfactory. See letter from \_\_\_\_\_ dated \_\_\_\_\_.” See below.
- Ensure this is typed as a Serial Release Requirement in LSRTIS, so it shows in the ENSR (Electronic Notification of Serial Release).
  - Under the Serial Stat, “Serial Info” category – choose “Release Criteria Required” – Add Info link.

### Serial Info

|                             |                                      |
|-----------------------------|--------------------------------------|
| Most Recent Expiration Date | 06/28/2016                           |
| Release Criteria Required?  | No <a href="#">Add Info</a>          |
| Destruction Info            | <a href="#">Add Destruction Info</a> |

- Choose the toggle of “Release Criteria Required?”
- Fill in Criteria of “Conditional Release”
- Choose Due date of either off test date or end of at risk window
- Comments – add what you type on the Form 2008 (above bullets under 3.b.)

#### 4. Releasing the Conditional Release:

- a. The first leg of the conditional release should be in BCA Ready for Approval. Ensure the APHIS Disposition shows “Other - Conditional Release Granted” in the Action Sheet. Approve the Form 2008.
- b. The Form 2008 should move to Ready for Signature. The Specialist will sign the “first leg” of the conditional release both electronically and hard-copy.
- c. If hard copy:
  - Stamp the photocopy of the Form 2008 with the appropriate stamps in Blocks 18 and 19, and then give to the initiating Specialist for signature.
  - Mail photocopy of Form 2008 to firm, Contact the firm of Conditional Release action, and document the contact on **ICFRM0010** and the Phone Log #.
  - Drop file the CVB photocopy with original Form 2008 and any other paperwork in the corresponding product code file in the pending 2008 file drawer.

#### 5. Releasing the Original Form 2008:

- a. Once testing has been verified or the at-risk window complete, the “final leg” of release of the electronic Form 2008 will move to BCA Ready for Approval area, which can be approved and moved on for Signature by the Specialist.

## Conditional Serial Release

- b. Once the serial comes up for final release in BCA Ready for Approval, pull the previous photocopy and paperwork from the pending drawer. This is the “final leg” of the conditional release.
- c. Complete the APHIS disposition (Block 16) on the original Form 2008: The APHIS disposition of the serial on the Action Sheet will be based on either the Firm’s disposition or CVB Laboratory testing results.
  - If the serial was tested as “SAT” by our lab, check “SAT” and “Other”, and type, “This completes the conditional release granted per Specialist name on initial date of conditional release” (from worksheet).  
or
  - If the serial was not tested and the Action Sheet shows to release as “Not to Be Tested,” check “NBT” and “Other,” and type, “This completes the conditional release granted per Specialist name on initial date of conditional release” (from worksheet).
  - Complete the Release Requirements in LSRTIS (so it does not show up on the ENSR report). This will show in the Serial Stat again.
    - Choose the “Edit Serial Release Criteria”

### Serial Info

|                             |   |
|-----------------------------|---|
| Most Recent Expiration Date | 06/30/2016  |
| Release Criteria Required?  | Yes <a href="#">Edit Serial Release Criteria</a>                                  |
| Release Criteria            | potency tests   |
| Due Date                    | 01/31/2016  |
| Completion Date             |   |
| CVB User                    | Osorio, Ruben   |
| Release Comments            | Serial <input type="text"/> to be tested for potency 6 months prior to expiration |
| Destruction Info            | <a href="#">Add Destruction Info</a>  |

- Fill in the “Completion Date” with the date of Release of final Leg.
- d. Stamp the Form 2008 with the appropriate stamps in Blocks 18 and 19. **The date on the Form 2008 is the date of the Action Sheet.**
- e. Give the Form 2008 to the Program Coordinator for signature with any other serials up for release that day. (Clip “first leg” copy to the original Form 2008.)
- f. Staple the original Form 2008 on top of the “first leg” Form 2008 of the conditional release. File Form 2008 in file room.
- g. Mail firm’s copy of the Form 2008.
- h. Complete Section 9 of the **ICFRM0010**, indicating the date of release and initials of the BCA processing the form.
- i. File the completed worksheet with product correspondence in the file room. A copy is included with the Action Sheets in the pending 2008 file drawer.