Guidance for Industry

How to Use E-Mail to Submit a Protocol

This guidance document describes how to use e-mail to submit protocols for studies in support of New Animal Drug Applications to the Center for Veterinary Medicine (CVM).

An e-mail submission that follows this guidance will be compatible with CVM's current information technology capabilities. This will help to ensure the confidentiality, integrity, security, and authenticity of data submitted to the Center. If a regulated person wishes to use an electronic approach other than that set forth in this guidance document, the Center will, on request, discuss alternative methods of submitting protocols.

Comments and suggestions regarding this document should be submitted, by paper, to the Policy and Regulations Team, Center for Veterinary Medicine, HFV-6, 7500 Standish Place, Rockville, MD 20855.

For questions regarding this document, contact Elizabeth L. Parbuoni, Center for Veterinary Medicine, (HFV-016), Food and Drug Administration, 7500 Standish Place, Rockville, MD 20855, 301-827-3845, E-mail: eparbuon@cvm.fda.gov.

U.S. Department of Health and Human Services
Food and Drug Administration
Center for Veterinary Medicine
March 27, 2003

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GUIDANCE FOR INDUSTRY[1]

HOW TO USE E-MAIL TO SUBMIT A PROTOCOL

This guidance represents the Center for Veterinary Medicine's (CVM or Center) current thinking about using e-mail to submit a protocol for a study. It does not create or confer any rights for or on any person and does not operate to bind the Food and Drug Administration (FDA) or the public. An alternative approach may be used if such approach satisfies the requirements of the applicable statute and regulations.

I. BACKGROUND

Protocols for nonclinical laboratory studies (safety studies) are required under 21 CFR 58.120. Protocols for adequate and well-controlled effectiveness studies are required under 21 CFR 514.117(b). Sponsors may request that CVM review protocols for safety and effectiveness studies of new animal drugs. The review of protocols facilitates the drug review and approval processes.

Currently, CVM receives protocols in paper format. CVM is publishing this guidance to give sponsors the option to submit a protocol as an e-mail attachment via the Internet.

The electronic submission of protocols is part of the Center's ongoing initiative to provide a method for paperless submissions.

This document reflects the principles behind the Government Paperwork Elimination Act, Pub. L. No. 105-277, 112 Stat. 2681 (1998), which requires that executive agencies, by October 21, 2003, provide: (1) for the option of the electronic maintenance, submission, or disclosure of information, if practicable, as a substitute for paper; and (2) for the use and acceptance of electronic signatures when practicable.

This document contains specific instructions for submitting protocols electronically. Guidance #108, How to Use E-Mail to Submit Information to CVM, contains general instructions and specifications on submitting information electronically to CVM by e-mail. It is available on the CVM Home Page [http://www.fda.gov/cvm].

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[1] This guidance has been prepared by CVM at FDA. For additional copies of this guidance, access the document on the Internet by connecting to the CVM Home Page at http://www.fda.gov/cvm, or send a request to the Communications Staff, HFV-12, 7500 Standish Place, Rockville, MD 20855.

II. ORGANIZATION AND FORMAT OF PROTOCOL SUBMISSIONS

The Smart Form, cover letter, protocol, and any appendices should be contained in one Portable Document Format (PDF) file.

A. Smart Form

All applicable fields of the "Protocol for Non-clinical Laboratory and Effectiveness Studies" Smart Form (Form FDA 3536) (Smart Form) should be filled out. Note that the form cannot be transmitted if certain fields are not filled in. The use of this Smart Form allows for quality control of the information about the protocol, and reduces the chance incomplete information will be submitted. The information requested on the form also allows the submitted material to be automatically logged into the Center's tracking system (Submission Tracking and Reporting System, known as STARS). This Smart Form should be the first page of the PDF protocol submission file.

B. Cover Letter

If the sponsor chooses to include a cover letter, it should be submitted as part of the PDF file in the order specified in step 2 of the Section III, "Checklist for Submitting a Protocol using Adobe Acrobat 4.05 or 5.0."

C. Protocol and Appendices

The protocol must contain the elements described in 21 CFR 58.120 for safety studies and 21 CFR 514.117(b) for adequate and well-controlled effectiveness studies. Additional guidance for protocols for effectiveness studies that are conducted in the target species is contained in Guidance for Industry: Good Clinical Practices: VICH GL9, Final Guidance 05/09/01.

D. Electronic format of PDF file

The following recommendations are intended to assist sponsors in creating PDF files that are compatible with CVM's current information technology capabilities and to ensure the confidentiality, integrity, security, and authenticity of data submitted to the Center.

1. Version

CVM is using version 5.0 of Adobe® Acrobat® for review of electronic submissions. All PDF files submitted to CVM should be created using software that permits the Center to read, search, copy, and paste information from the PDF file into a word processing document using version 5.0 of Adobe® Acrobat®.

2. Fonts

All fonts should be embedded in the PDF file to ensure that those fonts will always be available to the reviewer. Font substitution can affect a document's appearance and structure, and in some cases (for example, Greek letters) it can affect the information conveyed by a document. Therefore, all characters for the font and the subset of the characters should be embedded.

CVM recommends that the following settings be used for general text:

- Arial, 12-point font
- Black font color for general text
- Blue text for hyperlinks

3. Page Setup

The print area for pages should fit on a sheet of paper that is 8.5 inches by 11 inches.

4. Hypertext Linking and Bookmarks

Tools such as bookmarks and hypertext links enable the reviewer to move efficiently through the document.

Bookmarks should be provided for each item listed in the table of contents including all major section headings and subheadings. All tables, figures, publications, references, and appendices should also be bookmarked.

Hypertext links should be used to connect text to supporting annotations, related sections, references, appendices, tables, or figures that are not located on the same page as the text. Hypertext links should be designated by blue text.

When creating bookmarks and hyperlinks, you should choose the magnification setting *Inherit Zoom.* This allows the destination page to display at the same magnification level that the reviewer is using for the document.

The open dialog box sets the document view when the file is opened. The initial view of the PDF files should be *Bookmarks* and *Page*. You should set the *Magnification* and *Page Layout* to default.

5. Security

No security settings should be selected that would prevent printing, changes to the protocol, or selecting text and graphics. CVM's internal security and archival processes are designed to maintain the integrity of the submitted files.

6. Searching PDF Files

PDF files should be created in a manner that allows CVM to do full text searches. Because scanned images cannot be indexed, they cannot be searched and their use should be kept to a minimum.

E. Protocol Evaluation by CVM

The Center intends to transmit the results of its evaluation of the protocol to the sponsor by a signed paper letter. Until the Center sets specific standards for the use of electronic signatures that meet the requirements of 21 CFR Part 11, all official responses will be in paper format, including letters intended to transmit the results of protocol evaluations.

III. PROTOCOL FORM

A copy of the Protocol for Nonclinical Laboratory and Effectiveness Studies Form, FORM FDA 3536, is available on the CVM Electronic Submission Project Page at http://www.fda.gov/cvm/index/esubs/esubstoc.html.

IV. CHECKLIST FOR SUBMITTING A PROTOCOL USING ADOBE® ACROBAT® 4.05 OR 5.0

This checklist describes the process CVM recommends for creating a Portable Document Format (PDF) file using a word processing program, printing it to the Acrobat® Distiller, and submitting the information.

1. You should build the protocol electronic file from source documents. Scanned PDF documents may be used for pages unavailable for word processing such as pen diagrams and observations forms but should be kept to a minimum.
2. The protocol electronic file should contain: the "Protocol for Nonclinical Laboratory and Effectiveness Studies" Smart Form (Smart Form), a cover letter (if you choose to submit one), the protocol, and any appendices. The cover letter, protocol, and any appendices should be converted into PDF files by printing the word processing documents using Acrobat® Distiller. Use the **Documents → Insert Pages** in Adobe Acrobat® to combine several PDF files into one. After the file is constructed, the PDF file should be saved using **File → Save As**. All hyperlinks and bookmarks should be verified after creating the single PDF file. Document Information Fields of the PDF file may be filled out at the sponsor's discretion.
3. All applicable fields of the "Protocol for Nonclinical Laboratory and Effectiveness Studies" Smart Form (Form FDA 3536) should be filled out. Note that the form cannot be transmitted if certain fields are not filled in. For example, the form cannot be transmitted if you do not fill in Item I.3 to identify whether the submission is
   - a protocol currently under review (yes to 3a classifies the submission as a revision to a pending submission) or,
   - a protocol that the Center has previously reviewed and issued a letter detailing the results of its review (yes to 3b classifies the submission as a protocol with a link to the previous submission).
4. Insert the PDF protocol file by clicking the Insert Submission button on the Smart Form.
5. Encrypt the PDF file by using the Add Password button on the Smart Form.
6. Send the PDF file to CVM's Electronic Submission System by using the Mail to button on the Smart Form.
7. The email will automatically be addressed to the proper mailbox with the correct subject line.
8. **You should not** type anything in the body of the message.
9. If you have not received an acknowledgment receipt from CVM (PDFHandler@cvm.fda.gov) within three business days after you have sent the submission, call the Electronic Document Control Unit at 301-827-8277 to report the problem and find out whether your submission was received.

DEPARTMENT OF HEALTH AND HUMAN SERVICES Food and Drug Administration Center for Veterinary Medicine	**Protocol for Non-clinical and Effectiveness Studies**	Form Approved: OMB No. Expiration Date: 00/00/00

PAPERWORK REDUCTION ACT STATEMENT: A Federal agency may not conduct or sponsor, and a person is not required to respond to, a collection of information, unless it displays a current valid OMB control Number. The public reporting burden for the collection of information is estimated to vary from 5 to 20 minutes, with an average of 12 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the necessary information, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information to the Food and Drug Administration, Center for Veterinary Medicine, 7500 Standish Place, Rockville, MD 20855.

Submit this notice electronically to:
Food and Drug Administration
Center for Veterinary Medicine (HFV-)
7500 Standish Place
Rockville, Maryland 20855
(E-mail:cvmdcu@cvm.fda.gov)

DATE: 01/01/2002
DOCUMENT ID: INAD 0
STUDY / TRIAL ID: Study ID
TYPE OF STUDY: ☐ Pivotal ☐ Non-pivotal

The sponsor, Company Name, submits a protocol for use of an investigational new animal drug. Protocols for nonclinical laboratory studies (safety studies) are required under 21 CFR 58.120. Protocols for adequate and well-controlled effectiveness studies are required under 21 CFR 514.117(b). Sponsors may request that CVM review protocols for safety and effectiveness studies of new animal drugs. This information is submitted in electronic form.

I. Requesting Protocol CVM Review Yes ☐ No ☐

1. DRUG NAME(S):
   Established name(s): Established Name of Drugs (if multiple, please separate by commas)
   Trade name(s): Trade Name
2. PROTOCOL TITLE
   a. Short Abstract Title (80 characters): Short Abstract Title
   b. Full Title (256 characters): Study Title
   c. Version Number (If Applicable): Version Number
3. PROTOCOL PREVIOUSLY SUBMITTED TO CVM: ☐ YES ☐ NO
   a. If Yes, is the Protocol currently under review in CVM ☐ Date submitted to CVM: 01/01/2002 CVM submission number: E 0
   b. Or, has the Protocol been previously reviewed by CVM ☐ Date submitted to CVM: 01/01/2002 CVM submission number: E 0

II. Sponsor Information

1. NAME: Company Name
2. ADDRESS: Applicant Address First Line
   Applicant Address Second Line
   City State 00000-0000
3. CONTACT NAME: Contact Name
4. CONTACT PHONE NUMBER: (000) 000-0000
5. CONTACT FAX NUMBER: (000) 000-0000
6. CONTACT E-MAIL ADDRESS: Email Address

SPONSOR SIGNATURE: (Adobe self sign)

III. Comments

Please enter any relevant comments here

IV. Protocol

Insert Submission | Add Password | Mail to