GLOBAL CASE STUDY

Sequence/Serial Numbering for an Initial IND

ABOUT THE CLIENT

A mid-size pharmaceutical company requested to have an initial IND submitted to the FDA with serial and sequence numbers of "0000".

The client's regulatory lead reached out to GLOBAL's submission manager to request this format, as she noticed the numbering between the company's submission number and the FDA referenced submission number were not the same. GLOBAL's submission manager knew that an initial (without previous preIND work) Investigational New Drug application required the sequence number to be 0001 and, per FDA Form 1571 instructions, the serial number would be 0000.

ABOUT THE PROJECT

Legacy processes often dictate company's processes in current day. Unfortunately, FDA regulations and ways of working change over time and GLOBAL stays on the pulse of FDA regulations!

Prior to eCTD electronic filings, submissions were sent to the FDA with the same details; 0000 would be listed on the cover letter and 0000 would be allocated on FDA Form 1571. After the FDA implemented its electronic filing system, the two were decoupled. This allows for preIND submissions to begin with 0001 in the eCTD software when an FDA Form 1571 is not required. This process was widely adopted but often companies push back to keep the numbering the same. To match the numbers, a communication with your regulatory project manager at the FDA is needed.

REGULATORY OPERATIONS OVERVIEW

Submission and Project Management

Our submission and project managers work closely with clients to build and manage submission timelines, track source content (e.g., protocols and reports), develop eCTD sections, workflows, and actions, handle issues, facilitate decisions, and coordinate with eCTD publishers.

eCTD Publishing

Our eCTD publishers will work with the project team to develop submission strategies and ultimately transmit submissions through FDA's ESG portal.

GLOBAL'S REGULATORY OPERATIONS CAPABILITIES

Create and manage timelines for the functional area submission components as well as the overall submission.

Project management including facilitate team meetings to keep teams on track towards timelines.

Create and manage **risk registers** and support due diligence activities by performing **inventory and gap assessments** of regulatory files.

Publish eCTD submissions including assembling sections using eCTD-compliant software, performing quality checks of the full submission, and transmitting through FDA's ESG portal.

ABOUT THE PROJECT (CONTINUED)

Submissions to FDA go through their Electronic Submissions Gateway (ESG). Our submission manager had extensive experience with ESG and knew that it is not correct to submit an initial Investigational New Drug application via eCTD with a sequence number of "0000".

Additional review of the FDA's guidance documents and a communication with the FDA revealed conflicting information to the company's policy.

The regulatory landscape for eCTD submissions is ever-changing and complex. After the review of FDA's guidance documents, the submission manager determined that more clarity was needed to help best guide the client.

GLOBAL SOLUTIONS

GLOBAL's submission manager requested that the regulatory lead reach out to the FDA project manager for guidance. Their response indicated what GLOBAL's submission manager had known:

- The eCTD sequence number for an original submission must be "0001".
- The serial number on FDA Form 1571 should be "0000".

This feedback confirmed that the sequence number and the serial number should never match on a submission.

OUTCOME

The submission manager educated the project team on the differences between serial number (the number listed on FDA Form 1571) and sequence number (the number given to the eCTD submission), as it was clear the understanding was the numbers were the same.

The initial IND was successfully submitted to the FDA with a sequence number of "0001" and a serial number of "0000," in compliance with FDA guidance. Since the client's legacy process was different from this guidance, clear identification of both the serial numbers and sequence numbers was required on both the internal document management system and the accompanying cover letter. The clear identification of the numbers was needed for the initial IND as well as any future IND submissions.

CONCLUSIONS

When it comes to FDA submissions, even what seems like "small" clerical errors can be cumbersome for the submission lifecycle. While it seems unharmonious for the serial and sequence numbers to be different, this follows FDA guidance. Failure to comply with any FDA guidance puts the sponsor company at risk of validation errors or submission rejection. This can ultimately affect timelines and create unbudgeted expenses. Partnering with a regulatory firm with extensive experience and a thorough understanding of FDA guidance and the eCTD regulatory landscape is critical to the success of your submission.