Guidance: Investigational New Drug Application

An Investigational New Drug (IND) application is a request for Food and Drug Administration (FDA) authorization to administer an investigational drug to humans. The authorization must be secured prior to interstate shipment and administration of any new drug that is not the subject of an approved new drug application. The authorization goes into effect 30 days after the FDA receives the IND, unless otherwise notified. IND regulations are found in 21CFR312. The Form 1571 should be sent to FDA with supporting documentation (CVs, results of prior studies, study protocol etc.). Upon receipt of the IND, an IND number is assigned, and the application is forwarded for review.

Investigators who are also acting as the sponsor, ‘sponsor-investigator’, are held to both the responsibilities of sponsors and the responsibilities of investigators. Thus submitting an IND application is required prior to starting a study. For administrative purposes, only one individual should be designated as a sponsor.

Below are items the sponsor-investigator is responsible for:
- Conducting the study according to the most current approved protocol
- Ensuring clinical monitoring is conducted by a qualified individual and is documented
- Obtaining informed consent
- Following the study protocol, and if a change is made, an amendment must be sent to and approved by the FDA
- Reporting adverse events to the FDA
- Sending annual progress reports to the FDA
- Maintaining adequate record keeping of drug disposition
- Maintaining adequate safety reports
- Labeling all drug products with an investigational drug label
- Permitting inspection of the study records and reports by the FDA and institutional personnel

Investigators interested in filing his/her own IND should contact the Office of Clinical Research Support for assistance.

Examples of when an IND is warranted because of greater risk include:
- Increased dose
- Different route of administration
- The research population is “vulnerable”
- Longer duration
- There is reason to believe that this population has different pharmacokinetic or pharmacodynamic responses from the indicated population

Research involving a drug or biologic that has not yet reached the marketplace requires an IND. The FDA carefully and critically reviews these applications and will only allow human exposure if they feel that the risks of the exposure are reasonable.

The IND application usually contains:
- Evidence of safety and tolerability in animals
- A controlled method of manufacture that assures the consistency of the final drug product
- Specific test for significant toxins or tonic ingredients
- A well-developed research plan that minimizes the risks for human subjects
An IND is also required if a previously approved drug is being used for a new indication.

Exemptions to an IND apply as long as the product is used according to the product labeling (dose, patient population, etc.).

**When completing the IND application, the following is a checklist of what should be included in the submission package:**

- Cover letter
- Introductory Statement: brief explanation of drug, all active ingredients, structural formula of drug, formulation and dosage(s) to be used, route of administration and the broad objections. This information is usually provided in the investigator's brochure or package insert.
- General Investigational Plan: brief description of the overall plan for investigating the drug and product for the following year. Should include:
  - Rationale for the drug/research study
  - Indication
  - General approach to be followed in evaluation the drug
  - The kind of clinical trials to be conducted in the first year
  - Estimated number of patients to be given the drug
  - Risks anticipated, toxicological data in animals in prior studies and humans of drug and related drugs
- Form FDA 1571
- Study protocol
- Form FDA 1572
- IRB approval letter and approved consent form: if not yet approved by IRB, include IRB submission cover letter, provisos if available and consent submitted
- Submit package
  - Three (3) copies should be submitted. One (1) original and two (2) copies as a single package to the FDA.

The following is a listing of resources:

Form 1571
[www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083533.pdf](http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Forms/UCM083533.pdf)

Form 1571 Instructions

FDA Explanation of New Drug Application