U.S. FOOD & DRUG ADMINISTRATION

Memorandum

DATE: July 14, 2021

TO: Wenyu Sun, MD, BLA Committee Chair and Clinical Reviewer
Adrienne Fisher, MPH, MBA, BLA RPM

FROM: Malcolm Nasirah, PharmD, MS, Regulatory Reviewer
Bioresearch Monitoring Branch (BMB)
Division of Inspections and Surveillance (DIS)
Office of Compliance and Biologics Quality

THROUGH: Dennis T. Cato, Chief, BMB Dennis Cato -S Digitally signed by Dennis Cato -S DN: c=US, o=U.S. Government, ou=HHS, ou=FDA, ou=People, cn=Dennis Cato -S, 0.9.2342.19200300.100.1.1=2000356248 Date: 2021.07.14 14:25:17 -04'00'

THROUGH: Carrie M. Mampilly, MPH., Director, DIS Carrie M. Mampilly -S Digitally signed by Carrie M. Mampilly -S DN: c=US, o=U.S. Government, ou=HHS, ou=FDA, ou=People, 0.9.2342.19200300.100.1.1=1300232966, cn=Carrie M. Mampilly -S Date: 2021.07.14 14:37:09 -04'00'

SUBJECT: Bioresearch Monitoring (BIMO) Discipline Review Memo

PRODUCT: Immune Globulin Intravenous (Human)- 10%

SPONSOR: Octapharma Pharmazeutika Produktionsges.m.b.H.
BLA STN: 125062/674

REVIEW SUMMARY

BIMO inspections were issued for four clinical study sites that participated in the conduct of study Protocol GAM10-08. Two out of four inspections were completed and two inspections were cancelled due to the public health emergency. The completed inspections did not reveal substantive issues that impact the data submitted in this Biologics License Application (BLA).

BACKGROUND

Four U.S. clinical study sites conducting the phase III study Protocol GAM10-08 were identified for BIMO inspections. The sites were selected based upon previous BIMO inspection history, sponsor-reported adverse events, protocol deviations, and total number of subjects enrolled.

The inspections were conducted in accordance with FDA's Compliance Program (CP) 7348.811, Inspection Program for Clinical Investigators. Information submitted in the BLA was compared to source documents at each inspected site. The inspection assignment also included specific questions concerning the clinical study.

PROTOCOL

Protocol No. GAM10-08: A Prospective, Double-blind, Randomized, Placebo-Controlled Phase III Study Evaluating Efficacy and Safety of Octagam 10% in Patients with Dermatomyositis

The sponsor reported a total of 95 subjects enrolled under clinical study Protocol GAM10-08 at 55 sites in 10 countries. The inspected domestic site(s) comprised about 6% of the total subjects enrolled under Protocol GAM10-08.

BIMO INSPECTIONS SUMMARY

The table below summarizes site information and outcomes from the BIMO inspections.

Study Site #	Firm Name	Location	FDA Form 483 Issued	Inspectional Final Classification
(b) (6)		Pittsburgh, PA	Yes	VAI
		Ann Arbor, MI	No	Canceled due to COVID-19 Pandemic
		Tampa, FL	No	NAI
		Austin, TX	No	Canceled due to COVID-19 Pandemic

NAI = No Action Indicated. VAI = Voluntary Action Indicated

INSPECTIONAL FINDINGS:

The inspections at Sites (b) (6) and (b) (6) were cancelled due to the public health emergency.

Site (b) (6)

Observation 1: An investigation was not conducted in accordance with the investigational plan, in that:

- One subject was enrolled in the study despite meeting an exclusion criterion.
- For two of three subjects, weight measurements were not used in a consistent manner to determine infusion rate and/or dose as required by the protocol.

Observation 2: Failure to prepare or maintain accurate case histories with respect to observations and data pertinent to the investigation, in that for two out of three subjects, the severity of an adverse event as described in medical records was inconsistent with the severity documented on the adverse event log and reported in the electronic case report form.

Site (b) (6)

There were no inspectional observations at the conclusion of this inspection.

SPONSOR/MONITORING ISSUES

No significant sponsor or monitoring issues were identified during the above inspections.

FINANCIAL DISCLOSURE

The Clinical Investigator Compliance Program directs the FDA investigator to ask the clinical investigator if and when he/she disclosed information about his/her financial interests to the sponsor and/or interests of any sub-investigators, spouse(s) and dependent children, as well as if and when the information was updated. The information submitted to the BLA was verified for each of the inspected clinical study sites.

ADMINISTRATIVE FOLLOW-UP

Should you have any questions or comments about the contents of this memo or any aspect of Bioresearch Monitoring, please contact me at 301-796-6667 or Malcolm.Nasirah@fda.hhs.gov.

Malcolm M. Nasirah -S

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Malcolm Nasirah, PharmD, MS, BCGP
Consumer Safety Officer

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Draft: Nasirah: 7/14/2021
Reviewed: Cato: 7/14/2021