

**MEMORANDUM**

DEPARTMENT OF HEALTH AND HUMAN SERVICES  
Public Health Service  
Food and Drug Administration  
Center for Biologics Evaluation and Research

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DATE February 28, 2017

FROM Erin McDowell, Bioresearch Monitoring Branch  
Division of Inspections and Surveillance  
Office of Compliance and Biologics Quality

THROUGH Patricia Holobaugh, M.S., Bioresearch Monitoring Branch Chief  
  
Carrie Mampilly, M.P.H., Director, Division of Inspections and Surveillance

TO Michael Kennedy, Ph.D., Chair and Clinical Reviewer  
Jiahua Qian, Ph.D., RPM

SUBJECT Bioresearch Monitoring Summary Memo  
SPONSOR: Kamada Ltd.  
PRODUCT: KamRAB (Rabies Immune Globulin)  
BLA: 125613/0

Review Summary

Bioresearch Monitoring inspection of one clinical investigator site were conducted in support of this Biologics Licensing Application (BLA). The bioresearch monitoring inspection did not reveal substantive problems that impact the data submitted in this Supplemental Biologics Licensing Application (SBLA).

Background

The BIMO member of the review committee proposed to inspect the single clinical site for this application and clinical study KAMRAB-003, “*A Prospective, Randomized, Double-Blind, Non inferiority, Phase II/III Study of the Safety and Effectiveness of Simulated Post-Exposure Prophylaxis with Kamada Human Rabies Immune Globulin (KamRAB) with Co-administration of Active Rabies Vaccine in Healthy Subjects.*” The review committee concurred. The inspection covered approximately 30 subjects representing ~25% of the subjects enrolled. The inspection was conducted in accordance with FDA’s Compliance Program Guidance Manual (CPGM) 7348.811, Inspection Program for Clinical Investigators. The inspection also focused on specific questions concerning the study protocol and the comparison of data submitted in the BLA to source documents.

Bioresearch Monitoring Inspections were conducted at the following clinical site:

Site Number	Study Site	Number of Subjects	Location	Final Inspection Classification
01	Prism Research, LLC	118	St Paul, Minnesota	NAI

NAI= No Action Indicated

A review was conducted of testing records, regulatory binders, study specific standard operating procedures, and general study conduct including records of subject eligibility, medical history, adverse events, laboratory reports, protocol deviations, and subject dispositions. No Form FDA 483 was issued.

The study was supposed to be “blinded” to subjects and staff except for two un-blinded pharmacists. Subjects were administered test article at baseline/Visit 2, and active vaccine at Visit 2 – 6. Subjects completed diaries at home to record any adverse events or concomitant medications, and these were reviewed by study staff at visits. For 6 subjects, the FDA investigator observed the test article dose preparation by one of the pharmacists had the dose preparation (subject identification, dose volume, weight calculations, and syringe volume after drawn) verified by floor staff. The site claims that randomization was performed by a pharmacist only at a later point. The three floor staff members who verified the dose preparation later performed additional tasks with the subjects including dosing the subject, drawing blood, inquiring about AEs, etc. This was not to be permitted per the protocol and could possibly have broken the blind for these 6 subjects.

The FDA Investigator did not find any deviations from the applicable regulations at the site. The inspection was classified as No Action Indicated (NAI).

#### Sponsor Monitoring Issues

No issues were identified.

#### 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, and if and when the information was updated. The information submitted to the BLA was verified for each of the inspected clinical sites.

#### Administrative Follow-up:

A letter was issued to the clinical investigator site. Should you have any questions or comments about the contents of this memo or any aspect of Bioresearch Monitoring, please contact me at 240-402-9014.

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Erin McDowell  
Consumer Safety Officer

Electronic Copies:

EDR Upload to 125613/0 Application Folder

Michael Kennedy, Chair and Clinical Reviewer

Winson Tang, Clinical Reviewer

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Carrie Mampilly

CBERBimoNotification

Sharon Matson, FDA Investigator