Our STN: BL 125730/0

LATE-CYCLE MEETING MEMORANDUM

Stratatech Corporation
Attention: Mary Lokuta, PhD
510 Charmany Drive, Suite 150
Madison, WI 53719

Dear Dr. Lokuta:

Attached is a copy of the memorandum summarizing your November 12, 2020 Late-Cycle Meeting teleconference with CBER. This memorandum constitutes the official record of the teleconference. If your understanding of the teleconference outcomes differs from those expressed in this summary, it is your responsibility to communicate with CBER in writing as soon as possible.

Please include a reference to the appropriate Submission Tracking Number BLA 125730 in future submissions related to the subject product.

If you have any questions, please contact Candace Jarvis at (240) 402-8315.

Sincerely,

Raj K. Puri, MD, PhD
Director
Division of Cellular and Gene Therapies
Office of Tissues and Advanced Therapies
Center for Biologics Evaluation and Research

Late-Cycle Meeting Summary

Meeting Date and Time:	November 12, 2020, 11:00 AM-12:30 PM
Meeting Location:	Teleconference
Application Number:	125730/0
Product Name:	StrataGraft
Indication:	StrataGraft skin tissue is indicated to promote durable wound closure & regenerative healing in the treatment of adult patients with (b) (4) thermal burns that contain intact dermal elements, and for which surgical intervention is clinically indicated
Sponsor/Applicant Name:	Stratatech Corporation
Meeting Chair:	Steven Bauer, PhD
Meeting Recorder:	Candace Jarvis

FDA ATTENDEES

Steven Bauer, PhD, CBER/OTAT/DCGT
Candace Jarvis, CBER/OTAT/DRPM
Rosa Sherafat-Kazemzadeh, MD, CBER/OTAT/DCEPT
Marian Ortiz-Rodriguez, CBER/OCBQ/DMPQ
Wei Liang, PhD, CBER/OTAT
David Rouse, PhD, CBER/OD
Hector Carrero, CBER/OCBQ/DMPQ
John Dennis, PhD, CBER/OTAT/DCGT
Most Nahid Parvin, PhD, CBER/OCBQ/DSBQC
Ravi Goud, PhD, CBER/OBE/DE
Lori Tull, CBER/OTAT/DRPM
Beatrice Kallungal, MS, CBER/OTAT/DRPM
Laura Ricles, PhD, CBER/OTAT/DCGT
Jane Baumblatt, MD, CBER/OBE/DE
Lisa Stockbridge, PhD, CBER/OCBQ/DCM
Melanie Eacho PhD, CBER/OTAT/DCGT
Berk Oktem, PhD, CDRH/OSEL/DBCMS
Varsha Garnepudi, PhD, CBER/OCBQ/DSBQC
Stan Lin, PhD, CBER/OBE/DB
Wilson Bryan, MD, CBER/OTAT
Kimberly Benton, PhD, CBER/OTAT
Rachael Anatol, PhD, CBER/OTAT
Abigail Shearin, PhD, CBER/OTAT/DCEPT
Nadia Whitt, CBER/OTAT/DRPM
Dan Kelly Wang, PhD, CBER/OTAT/DHT
Tejashri Purohit-Sheth, MD, CBER/OTAT/DCEPT

Takele Agrawal, PhD, CBER/OTAT/DCGT
Manette Niu, MD, CBER/OBE/DE
Randa Melhem, PhD, CBER/OCBQ/DMPQ
Haecin Chun, CBER/OCBQ/DIS
Muhammed Shahabuddin, PhD, CBER/OCBQ/DBSQC
Lei Xu, MD, CBER/OTAT/DCEPT
Scott Brubaker, MD, CBER/OTAT/DHT
Michael Brony, PhD, CBER/OCBQ/DCM
John Eltermann, R.Ph., M.S. CBER/OCBQ/DMPQ
Ramani Sista, PhD, CBER/OTAT/DRPM

APPLICANT ATTENDEES
Steven Romano, MD, Executive VP and CSO
Mary Lokuta, PhD, Director, Regulatory Affairs
Sheryl Raukete, B.Pharm (Hons) Regulatory Affairs
Sharad Agarwal, Director, Regulatory Affairs, CMC
David Young, Sr. Director, Regulatory Affairs, CMC
Allen Comer, PhD, Senior Director, Research, Strategy, and Innovation
Lee Shaughnessy, PhD, Quality Project Manager
Brian D Doty, VP, Pharmaceutical Sciences
Liam Keary, VP, Global Quality, Global Operations
Dan Feddersen, Director, Quality
Rodrigo Mesquita, Senior Director, Operations
Nilima Justice, MD, VP Pharmacovigilance
Regis Vilchez, MD PhD, VP Clinical Development
Janice Smiell, MD, Sr. Director, Clinical Development
Tony Johnson, Senior Director, Global Clinical Quality Assurance

BARDA Attendees:
Narayan Iyer, Branch Chief, Burns
Sabrina Mcintyre, Contracting Officer
Franco Aveau, Sr. Program Analyst
Irene Tennant, Sr. Regulatory Affairs Analyst
Melissa Willens, Regulatory
James Embree, CMC SME

BACKGROUND

BLA 125730/0/ on June 5, 2020, for StrataGraft (ESTABLISHED/PROPER NAME is under review currently)

Proposed indication: StrataGraft skin tissue is indicated to promote durable wound closure & regenerative healing in the treatment of adult patients with (b) (4) thermal burns that contain intact dermal elements, and for which surgical intervention is clinically indicated

PDUFA goal date: February 3, 2020

In preparation for this meeting, FDA issued the Late-Cycle Meeting Materials on November 2, 2020.

DISCUSSION

1. Discussion of Substantive Review Issues

   Chemistry, Manufacturing and Controls (CMC):

   - Potential need for further information regarding viral validation, depending on review of information from CROs. Collagen viral clearance validation may be an issue depending on timing of submission and review.

     Meeting Discussion: Stratatech has initiated a viral clearance study with (b) (4) to assess the inactivation of viruses during (b) (4) of collagen in the (b) (4) . They anticipate preliminary results to be available by November 20, 2020 with the final reports submitted by the end of November 2020. FDA review of viral validation and collagen viral clearance is ongoing. Bovine Virus test data was submitted; however, review of this submission is not complete, but noted that the test for related information pertaining to 9CFR113 has not been located and may need more information. Stratatech will provide the missing information if deemed necessary.

   - Potential delay due to inspection scheduling and COVID-19

     Meeting Discussion: Stratatech is aware of the inability of FDA to conduct a face to face inspection because of the COVID 19 pandemic and is willing to provide any documentation ahead of an inspection or conduct a virtual inspection. FDA will continue to monitor the situation with COVID-19 and has submitted records requests.

2. Discussion of Minor Review Issues

   CMC

   - Please provide an update on the status of the Histology method validation.

     Meeting Discussion: Stratatech plans to change the criterion for the histology acceptance from "(b) (4) " to reflect the presence of a (b) (4) as recommended by FDA. Stratatech has also incorporated other FDA recommendations for the validation protocol and the results of the validation study will be submitted to FDA by November 30, 2020.

   - IR#29 due November 12, 2020: IR #29 requested a toxicological risk assessment for (b) (4) , which were detected during the leachable study for the container closure.

Meeting Discussion: Stratatech will provide the toxicology risk assessment for (b) (4) on November 12, 2020.

3. Additional Applicant Data

Stratatech did not have any additional data to submit.

4. Information Requests

IRs submitted 10/29 or 10/30

- 9/20/2020: IR14 Requested complete validation reports for general viral screening and detection methods used for Adventitious Agent and Viral Testing of (b) (4) .
  Extension was granted upon sponsor request.
  Update: IR 14 response was submitted on 10/30/20- the third party vendors have been provided contact information to enable submission of their complete validation reports.
- 9/10/2020: IR15 requested information on viral inactivation/clearance for Trypsin used in (b) (4) . Extension was granted upon sponsor request
  Update: IR 15 response was submitted on 9/15/20.
- 9/24/2020: IR22 requested validation reports for all testing performed on the rat-tail collagen
  Update: IR 22 response was submitted on 10/30/20.
- 10/5/2020: IR 23 requested validation reports or verification data for identity testing performed as part of the reagent qualification program.
  Update: IR 23 response was submitted on 10/29/20
- 10/23/20 IR 26 (DBSQC) Requested plan to qualify new (b) (4) from vendor
  Update: IR 26 response was submitted on 10/29/20.
- 10/23/20 IR 27 (Clinical) Requested a table of adverse reactions reported at a frequency >=2% in Pooled trials 1 (STRATA2016, STRATA2011, STRATA2014, and STRATA2001)
  Update: IR 27 response was submitted on 10/29/20.
- 10/26/2020: IR 28 requested information regarding the sensitivity of the (b) (4) testing method to detect (b) (4) from unexpected human sources for both NHDF and NIKS lines
  Update: IR 28 response was submitted on 10/30/20.

Meeting Discussion: Stratatech is evaluating additional testing methods that are suitable to meet this goal and is striving to develop and validate an assay that can be added to the current specification. Stratatech would like to request for the addition of this testing as a post-approval commitment.
FDA acknowledged the request and said this is being evaluated.

IR due 11/6/2020

10/29/2020: IR 31 (Clinical) Requested clinical data on 7 patients treated under expanded access INDs

Update: IR 31 response was submitted on 11/6/20

IR due 11/12/2020

10/28/20: IR 29 requested a toxicological risk assessment for (b) (4) from extractable and leachable testing of the product support tray

Update: IR 29 response will be submitted on 11/12/20

IR due 11/20/2020

- 10/29/20L IR 30 requested viral clearance validation studies for rat-tail collagen

  Update: The preliminary data for IR 30 will be emailed to the Agency on 11/2020. Stratatech will be able to submit the final report no later than 30 Nov 2020.

5. Discussion of Upcoming Advisory Committee Meeting

   An Advisory Committee meeting is not planned for this BLA.

6. Risk Management Actions (e.g., REMS)

   We have not identified any issues related to risk management. We do not believe that a risk management action (e.g., REMS) is needed at this time.

7. Postmarketing Requirements/Postmarketing Commitments

   There is no anticipation of PMRs/PMCs at this time. However, Stratatech has requested that the issue of (b) (4) testing for the two cell lines be part of a post marketing commitment.

8. Major Labeling Issues

   We have not identified any major labeling issues at this time.

   Meeting Discussion: Stratatech wanted to further discuss this topic as they wanted to propose a different proper name than Gintuit. They propose the non-proprietary name Skin construct with viable allogeneic human keratinocytes and dermal fibroblasts-xxxx" is most appropriate. FDA is evaluating the proposed name for the StrataGraft product. FDA will provide the product label information once cleared by the office.

9. Review Plans

   Review is ongoing based on information received. The final determination will be made after receipt of outstanding information.

10. Applicant Questions

    Meeting Discussion: Stratatech asked if the proper name needed to be captured on the outer labels. No update can be provided at this time as FDA is still reviewing the labels.

11. Wrap-up and Action Items

    - Review is ongoing
    - Ongoing review of viral clearance and studies

This application has not yet been fully reviewed by the signatory authorities, Division Directors and Review Committee Chair and therefore, this meeting did not address the final regulatory decision for the application.