



U.S. FOOD & DRUG
ADMINISTRATION

Memorandum

DATE: March 28, 2024

TO: Santosh Nanda, PhD, Chair
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FROM: Malcolm Nasirah, PharmD, MS, Senior Regulatory Reviewer
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Division of Inspections and Surveillance (DIS)
Office of Compliance and Biologics Quality (OCBQ)

THROUGH: Dennis T. Cato, Chief BMB

THROUGH: Carrie M. Mampilly, MPH, Director DIS

SUBJECT: Bioresearch Monitoring Discipline Review Memo

PRODUCT: RSV mRNA-1345 Vaccine

SPONSOR: Moderna

BLA STN: 125796/0

REVIEW SUMMARY

Bioresearch Monitoring (BIMO) Clinical Investigator (CI) inspection assignments were issued for four domestic clinical study sites that participated in the conduct of protocol mRNA-1345-P301. The inspections did not reveal substantive issues that impact the data submitted in this Biologics License Application (BLA).

BACKGROUND

Four clinical study sites conducting the study protocol mRNA-1345-P301 were identified for BIMO CI inspections. The sites were selected based upon the inspectional history, the primary efficacy and safety endpoints, 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 CIs. 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 mRNA-1645-P301.

PROTOCOL

Protocol mRNA-1345-P301: A Phase 2/3, Randomized, Observer-Blind, Placebo-Controlled Study to Evaluate the Safety and Efficacy of mRNA-1345, an mRNA Vaccine Targeting Respiratory Syncytial Virus (RSV), in Adults ≥ 60 Years of Age

BIMO INSPECTIONS SUMMARY

BIMO inspectional findings were noted for two of the four inspections. The below table summarizes site information and outcomes from the BIMO inspections.

Study Site #	Firm Name	Location	FDA Form 483 Issued	Inspectional Final Classification
US048	John Hemmersmeier, MD	South Ogden, UT	Yes	VAI –Voluntary Action Indicated
US064	Gilberto Jimenez, MD	Miami, FL	No	NAI – No Action Indicated
US069	Hessam Aazami, MD	Canoga Park, CA	No	NAI
US091	Ramy Toma, MD	Birmingham, AL	Yes	VAI

INSPECTIONAL FINDINGS:

Study Sites US064 and US069: There were no significant observations, and a Form FDA 483 was not issued at the close of these inspections.

Study Site US048: At close of this inspection, a three item FDA 483 was issued for:

- Failure to report two Serious Adverse Events (SAE) to the sponsor within 24 hours for Subject (b) (6) and (b) (6).
- Failure to conduct the investigation in accordance with the investigational plan: Some study coordinators or Research Assistants entered subject symptoms and visits outside of the duties assigned to them in the site's delegation of duties log.
- Failure to maintain accurate case histories: There were unverifiable records for when RSV illness started and ended for two subjects; (b) (6) and (b) (6). A total of 481 subjects were enrolled at site US048.

Study Site US091: At close of this inspection a Form FDA 483 was issued for:

- Failure to promptly report serious adverse events (SAE) to the sponsor: The CI did not report 13 SAEs to the sponsor within 24 hours. All SAEs were reviewed by the principal investigator within 24 hours and determined as unrelated to the investigative product. A total of 187 subjects were enrolled at site US091.

The corrective action plans presented from the CIs have been determined to be adequate and acceptable by BIMO.

SPONSOR/MONITORING ISSUES

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

FINANCIAL DISCLOSURE

The CI CP directs the FDA investigator to ask the CI 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 last 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.

Malcolm Nasirah, PharmD, MS
Consumer Safety Officer

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