

**CENTER FOR DRUG EVALUATION AND RESEARCH**

**APPROVAL PACKAGE FOR:**

**APPLICATION NUMBER**

**STN 103795/5102**

**Bioresearch Monitoring**

MEMORANDUM

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

---

DATE **MAY 23 2003**

FROM Christine Drabick, Bioresearch Monitoring Branch, HFM-664  
Division of Inspections and Surveillance  
Office of Compliance and Biologics Quality

TO Elektra Papadopoulos, HFM-582  
Chair, BLA Committee  
Karen Jones, HFM-588

SUBJECT Bioresearch Monitoring Inspection Results  
BLA: STN 103795/5102  
Product: Etanercept®  
Sponsor: Immunex Corporation

SUMMARY STATEMENT

**The results of bioresearch monitoring inspections of three clinical sites indicate that the submitted data can be considered reliable and accurate with exceptions noted.**

BACKGROUND

Inspections of three clinical investigators were performed in support of the subject Biologics License Application (BLA) Supplement. 205 subjects were enrolled in the study at seventeen study centers in the United States. Subject population and geographic distribution determined the site selections. The total subject population at the three inspection sites was 43 (21%). Copies of information from the BLA were compared with source documents during the inspection. The inspections focused on specific questions concerning the study identified below.

STUDY TITLE:

Double-blind, Randomized, Placebo-controlled Phase 3 Study of Etanercept (ENBREL®) in the Treatment of Psoriatic Arthritis (PsA) and Psoriasis: Radiographic Results

Study Dates: 3/31/00 to 8/8/02                      205 subjects

**CLINICAL INVESTIGATORS:**

			FDA 483	Inspection Classification
Stanley B. Cohen, M.D. Dallas, TX 75235	site # 107	16 subjects	Yes	VAI
James Taborn, M.D. Kalamazoo, MI 49001-1634	site # 476	14 subjects	No	NAI
Alice Gottlieb, M.D., Ph.D. New Brunswick, NJ 08903-0019	site # 310	13 subjects	Yes	VAI

**INSPECTIONAL FINDINGS**

1. Failure to ensure that the investigation is conducted according to the signed investigational plan. [21 CFR § 312.60].

The following deviations occurred at Dr. Cohen's site:

- A. Subject 0076 was enrolled in the study while continuing to receive a weekly dose of 30 mg methotrexate, although Section 4.1 of the protocol specifies that enrolled subjects on concomitant methotrexate should receive weekly doses of 25 mg or less.
- B. The following periodic assessments were not completed as required by the protocol:
  - i. Week 36 evaluations for Subject 0606, Week 24 evaluations for Subjects 041 and 0064, and Week 12 evaluations for Subject 056.
  - ii. Week 24 evaluations scheduled on 11/30/00 for subject 0048 were performed on \_\_\_\_\_ because the subject failed to appear for the \_\_\_\_\_ appointment.
- C. Subject clinical visits were not conducted within five days of the stipulated time point for evaluation as required by Section 7.0 the protocol.
  - i. Subject 0046 was scheduled for a Week 12 clinical visit on \_\_\_\_\_ but was not evaluated until \_\_\_\_\_
  - ii. Subject 0076 was scheduled for a Week 12 clinical visit on \_\_\_\_\_ but was not evaluated until \_\_\_\_\_

If you have any questions or comments about the contents of this memo or any aspect of Bioresearch Monitoring, please contact me at (301) 827-6323.

§

Christine Drabick  
Consumer Safety Officer

Attachments: Form FDA 483s for Drs. Cohen and Gottlieb

Application Number 103795/5102

Letter Type: BIMO Summary

cc:

**Hard Copy**

HFM-99           IND #8806  
HFM-600  
HFM-664        Access/Chron  
HFM-664        Drabick  
HFM-664        BLA Summary File

**Scanned Electronic Copy**

HFM-582        Siegel  
HFM-582        Papadopoulos, Chair STN103795/5102  
HFM-588        Jones  
HFM-573        Mills  
HFM-219        Misra  
HFM-650        Cole

HFR-SW100     Michael Chappell, Director  
HFR-SW1540    Joel Martinez, BIMO Coordinator  
HFR-SW150     Christopher Rush, Investigator  
HFR-SW150     Scott Nichols, Investigator

HFR-CE700     Joann Givens, Director  
HFR-CE250     Nancy Bellamy, BIMO Coordinator  
HFR-CE2565    William Tingley, Investigator

HFR-CE300     Douglas Ellsworth, Director  
HFR-CE3565    Shirley Isbill, BIMO Coordinator  
HFR-CE350     Byungja Marciante, Investigator