



Information Request

Our Reference: STN: 125752/2

Information Request #20

Date: November 12, 2021

To: **Michelle Olsen, Ph.D.**
ModernaTX, Inc.
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From: **Josephine Resnick, Ph.D.**
DVRPA/OVRR/CBER
Email: Josephine.Resnick@fda.hhs.gov

Product: COVID-19 Vaccine, mRNA (SPIKEVAX)

Subject: Datasets

Our review of your August 24, 2021 submission (STN 125752/2) is ongoing. We have the following requests for additional information:

There appear to be inconsistencies in the analysis dates (ADT) for SARS-CoV-2 infection regardless of symptomatology and asymptomatic infection between ADEFF and ADTTEB, on which the final efficacy analyses of these endpoints appear to be based. For example, subject US338-2007 tested positive for serology on both 2021-01-15 and 2021-03-10. However, the analysis dates for the two efficacy endpoints are 2021-01-15 in ADEFF and 2021-03-10 in ADTTEB. Of note, this subject was unblinded on 2021-01-15. Similar observations were made for subjects US340-2153, US397-2129, and among others. In addition, we note that some subjects (e.g. US321-2148, US303-2145, US315-2071, etc) had a positive PCR or serology on the same day (and for some cases e.g. US315-2071 the same time) as the Participant Decision Visit (PDV), but were not considered to have had an infection during the blinded phase even though the endpoints explicitly include infections detected at the PDV.

Please:

1. Clarify reasons for discrepancies in the analysis dates between the analysis datasets noted above.
2. Clarify why the later infection date in ADTTEB was used in the analysis for some participants even though the participants had documented infections at earlier time points.

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3. Explain your rationale for excluding positive PCR/serology results from subjects noted above collected on the same day as the PDV for the analyses of SARS-CoV-2 or asymptomatic infection during the blinded phase, despite IS.EPOCH or MB.EPOCH indicating that the sample was collected during blinded follow-up. We also note that some participants' MB.VISIT or IS.VISIT labeled as "Participant Decision Visit / OL-D1" do not appear to correspond to the start of the PDV or the unblinding date for those participants (e.g. US338-2007).

Please confirm your receipt of this request, and provide your responses as an amendment to STN 125752 at your earliest convenience but no later than November 19, 2021.

Commented [RJ1]: Please confirm response date...

Please contact me if you have questions and include Sudhakar Agnihothram (sudhakar.agnihothram@fda.hhs.gov) and Joseph Kulinski (joseph.kulinski@fda.hhs.gov) on all communications.