

DEPARTMENT OF HEALTH AND HUMAN SERVICES PUBLIC HEALTH SERVICE FOOD AND DRUG ADMINISTRATION		DISTRICT ADDRESS AND PHONE NUMBER 22201 23rd Drive SE Bothell, Washington 98021-4421 425-486-8788	
NAME OF INDIVIDUAL TO WHOM REPORT ISSUED To: Paula R. Bickle, Ph.D.		PERIOD OF INSPECTION 07/29-09/08/1999	C.F. NUMBER
TITLE OF INDIVIDUAL Principal Investigator		TYPE ESTABLISHMENT INSPECTED Same	
FIRM NAME Cascade Consultants Research Foundation, Inc		NAME OF FIRM, BRANCH OR UNIT INSPECTED Same	
STREET ADDRESS 9310 SE Stark		STREET ADDRESS OF PREMISES INSPECTED Same	
CITY AND STATE (Zip Code) Portland, Oregon 97216		CITY AND STATE (Zip Code) Same	
DURING AN INSPECTION OF YOUR FIRM WE OBSERVED: For the ██████████ Study ██████████			
I. Failure to provide adequate informed consent for the 16 subjects participating in the study. The informed consent form did not provide: <ul style="list-style-type: none"> a) a statement in sufficient detail on the expected duration of the subject's participation b) a description of the procedures to be followed c) identification of any procedures which are experimental. 			
II. Failure to document that adequate informed consent was obtained for all 16 subjects participating in the study. <ul style="list-style-type: none"> a) There were no written informed consent forms for Subjects ██████████ and ██████████ at the study site. b) The informed consent form for Subject ██████████ has a signature that was dated after the subject received the initial dose of the study drug. c) The informed consent for Subject ██████████ was not signed and dated by the subject. 			
III. There is no documentation available at the study site to support that an Institutional Review Board reviewed and approved the informed consent form used for the 16 subjects participating in the study.			
IV. DMPS was administered to study subjects prior to and/or after the principal investigator's participation in the IND clinical study. Subject records indicate at least 9 subjects were treated with DMPS before and/or after their participation in the IND clinical study.			
V. Records associated with the investigational study indicate the principal investigator has represented in a promotional context that an investigational new drug is safe and effective for the purposes for which it is under investigation or has otherwise promoted the drug (DMPS).			
VI. There is no documentation that an investigation was conducted regarding the death of study Subject ██████████ during the study, or that a report of an investigation was submitted to the sponsor regarding the findings of the investigation.			
VII. There is no documentation to support that the Institutional Review Board was promptly informed of the death of study Subject ██████████.			
VIII. There is no documentation available at the study site to support that a form FDA 1572 was submitted to the sponsor for the study to assure that individuals qualified by training and experience saw the study subjects and administered the study drug.			
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<p>IX. Failure to insure the study was conducted according to the signed investigator statement, the investigational plan, and applicable regulations.</p> <p>a) The principal investigator failed to provide a list of names of sub-investigators assisting in the conduct of the investigation on the form FDA 1572.</p> <p>b) 4 of the study subjects were dosed with less than the required 3mg/kg of [REDACTED] as specified in the protocol.</p> <p>c) There is insufficient documentation to determine that the required physical examination was performed prior to receiving the study drug for at least 6 study subjects.</p> <p>d) There is no documentation to indicate all of the required laboratory tests were performed before and/or after subjects received the study drug for each of the 16 subjects. For example:</p> <p>1) Subject [REDACTED] had no laboratory records to indicate the required pre-challenge urine test was performed for the 08/27/97 dose of the study drug</p> <p>2) Subject [REDACTED] had no laboratory records to indicate the required pre- and post-challenge urine tests were performed for the 08/06/97 dose of the study drug</p> <p>3) Subject [REDACTED] had no records to indicate the required venous blood gas analysis was performed prior to the 07/22/97 dose of the study drug</p> <p>e) Study records for Subject [REDACTED] indicate 4 doses of study drug were administered (09/02/97, 12/08/97, 12/23/97 and 01/05/98), with a physician signature dated 11/18/97 ordering the study drug. The principle investigator was terminated from the study on 09/26/97.</p> <p>f) Study records for Subject [REDACTED] indicate 3 doses of study drug were administered (07/30/97, 02/23/98, and 03/23/98), with physician signatures dated 07/97 and 02/23/98 ordering the study drug. The principle investigator was terminated from the study on 09/26/97.</p> <p>g) There is insufficient documentation to indicate the required allergy testing was accomplished prior to administration of the study drug for at least 9 subjects.</p> <p>h) There is insufficient documentation to indicate that 10 of the subjects received nutritional supplementation of chlorella and garlic in the two weeks prior to initial dosing as specified in the protocol.</p> <p>i) Failure to assign a unique randomization code to each study subject. Multiple randomization codes were assigned to the following subjects:</p> <p>1) Subject [REDACTED] was assigned numbers 001 and 002</p> <p>2) Subject [REDACTED] was assigned numbers 006 and 021</p> <p>3) Subject [REDACTED] was assigned numbers 009, 017, and 020</p> <p>4) Subject [REDACTED] was assigned numbers 015, 016, and 023.</p> <p>X. Failure to maintain complete and accurate records for the disposition of the study drug, including dates, quantity, and use by subjects.</p> <p>a) Records for Subject [REDACTED] indicate a second dose of [REDACTED] was received on 09/02/97. That dose is not documented on the master Drug Accountability Log.</p>			
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<p>b) Records for Subject [REDACTED] indicate a second dose of [REDACTED] was received on 09/03/97. That dose is not documented on the master Drug Accountability Log.</p> <p>c) The master Drug Accountability Log indicates that 1cc of the study drug was delivered sublingually to Subject [REDACTED] on 09/17/97. The subject cancelled the appointment and was not at the study site on that date.</p> <p>d) The master Drug Accountability Log indicates that dose for Subject [REDACTED] (015) on 09/03/97 was discarded. The source documents do not document why the dose was discarded.</p> <p>e) The amount of study drug used and the amount of study drug discarded for Subject [REDACTED] (006) on 07/03/97 is not recorded on the master Drug Accountability Log.</p> <p>XI. Failure to prepare and maintain adequate and accurate case histories that record all observations and other data pertinent to the investigation on each individual administered the investigational drug in the study.</p> <p>a) The study records for all 16 study subjects are incomplete with regard to Case Report Forms and the source data to document that the study protocol was properly performed.</p> <p>b) Failure to accurately and completely record on the Case Report Forms:</p> <ol style="list-style-type: none"> 1) the physical examinations for at least 6 subjects 2) the neurological examinations for at least 5 subjects 3) the study drug disposition for at least 8 subjects 4) the allergy testing for at least 11 subjects 5) the concurrent illness and concomitant medications for at least 11 subjects 6) the response to the study drug for at least 6 subjects <p>XII. There is no documentation available at the study site to support that an Institutional Review Board reviewed and approved Amendment #1, Amendment #2, Amendment #3, and Amendment #4, dated June 24, 1997 for the study.</p> <p>XIII. The methods, facilities, and controls used for the manufacturing, processing, and packing of the investigational drug are inadequate to establish and maintain appropriate standards of identity, strength, quality, and purity as needed for subject safety.</p> <p>XIV. Failure to control the investigational drug in that the study drug was not administered under the investigator's personal supervision or under the supervision of a subinvestigator responsible to the investigator.</p>			
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ITEMS # I - XIV NO COMMENT AT THIS TIME			
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