From: OC GCP Questions
To: [redacted]
Subject: Source doc / email question
Date: Wednesday, March 25, 2015 10:53:26 AM

Good morning –

Many institutions and sites are going to a fully electronic record system. It appears that the situation you describe in your email may not conflict with FDA regulatory requirements as it appears your email correspondence is your source document. It is not necessary to keep hard copies if the original files can be accessed electronically. However, if the protocol requires hard copies, whatever is specified in the protocol would be necessary. The regulations do not specifically address signing or dating of documents by the clinical investigator and or study staff. That said, sites therefore have flexibility in how they handle documents by creating standard operating procedures at their site. It appears you have done that.

The guidances listed below might be helpful to you.

Part 11 –Electronic Records --
http://www.fda.gov/downloads/RegulatoryInformation/Guidances/UCM126953.pdf

Computerized Systems Used in Clinical Investigations –
http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM070266.pdf

Electronic Source Data in Clinical Investigations –
http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM328691.pdf
This document includes information related to the creation and maintenance of electronic case report forms(eCRF). It describes and electronic medical record (EMR) as a possible data originator for an eCRF. However, section IV. of the document states that, although adequate controls need to be in place to ensure confidence in the reliability, quality and integrity of electronic source data, performance standards for EMRs may be regulated by other authorities and FDA does not intend to assess compliance of EMRs with part 11.

I hope this information is helpful. Please contact us again at gcp.questions@fda.hhs.gov for additional questions.

Kind regards,

Doreen M. Kezer, MSN
Senior Health Policy Analyst
Office of Good Clinical Practice
Office of the Commissioner, FDA

From: [redacted]
Sent: Tuesday, March 24, 2015 10:26 PM
To: OC GCP Questions
Subject: Source doc / email question

Dear GCP program representative: I'm seeking help with a question.

I work at a central image reading center. Investigative sites submit images to us, and we perform standardized image readings, in support of clinical trials.

I have a source doc question. We are still primarily using paper source documents (we are in the process of developing an integrated digital system to manage our data, but it is still in progress). Our current validated system can be described as a hybrid digital+paper system. My question involves a desire to streamline an existing email-based process for issuing and resolving queries to sites (before we transition to a longer term fully digital solution).

Our current process for issuing and resolving queries regarding sites' image submissions is as follows:

- We fill out a standardized query form using a template in MS Word, describing the problem.
- We send the Word document as an email attachment to the clinical site. The body of the email contains the study and patient identifiers, and the attachment contains the same in addition to the specific information we are requesting (query). We print the outgoing email and attachment to document our issuance of the query, and retain it with the source docs.
- Then our SOP requires that the clinical site print the attachment, write or type in any clarifications, and apply a wet ink signature and date to the form, and return it to us by FAX or scan+email. The signed/dated form is printed and retained with the source documents as a record of the query answer. Often this information results in a correction to previously-recorded data. I have been requiring a wet ink signature as a robust (if manual) way to document the site's intent to convey or change information.

The above process is described in our SOPs, and has been in use for a long time. It's not very environmentally friendly, given all the printing, but it's "safe." Our staff have recently asked me if they can avoid having the site print, sign and date the query form in the future, because the process is cumbersome and time-consuming for the sites. I understand the concern.

As an alternative, our team has asked me if they can start including the query in the body of the email, and allow the site to simply reply to the email with their response (without printing/signing anything). Then our staff proposes to print the site's email response and retain it with the source documents. The principal changes would be that (1) any query response / source data would be in the body of an email as opposed to an immutable PDF-type scan or FAX, and (2) that there would not be any wet ink signature/date certifying the submitted data.

Although we have several intelligent and experienced people on our team who believe that this would be a perfectly acceptable practice, as to myself, I am reluctant to agree to the staff's proposal because of Part 11. To the best of my knowledge, there is no explicit requirement for all source documents to be signed (ICH E6 8.3.13), meaning that an unsigned printout is acceptable as a source doc as long as it is a true and accurate record. Therefore, from that perspective, I can agree that the site's signature is extraneous and could be eliminated. However, I would think that the fact that the email is generated / transmitted electronically, and would itself be serving as a source document containing source data that may affect our handling / reading / reporting of the image or related data, renders it subject to Part 11 requirements. Is this correct? And if so, then does an email system satisfy the security / authentication requirements of Part 11? And does the email date/time and sender information serve as an adequate audit trail? I'm skeptical about both, but perhaps there are controls we can apply to achieve this.

In short, is unsigned, printed email correspondence considered a reliable source document that complies with all applicable regulations? Some of our sponsors/auditors have commented that this practice would be inadequate, which is very much the way I lean, but I'm honestly unsure, and many of our staff disagree. I have spent some time researching it and wasn't able to find the answer.

Therefore, I hope you can provide an answer. Again, this will only be a temporary solution, because we have plans to eventually go fully digital (with robust Part 11 controls). But I'd like to help the team streamline the current

process in the meantime, if possible.

Thank you very much, and I apologize for the lengthy email.

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