From: OC GCP Questions
To: [redacted]
Subject: Questions Regarding Wet Ink Signatures for Trial Master File
Date: Thursday, February 26, 2015 11:49:31 AM

Importance: High

Good morning --

There are no restrictions on which documents are maintained electronically or signed with e-signatures. If a site were to have a bioresearch monitoring (BIMO) inspection, the FDA investigator would look for the site's procedures for validating e-signatures if they are used and determine if they were followed since there are no specific procedures identified in the regulations.

I consulted our IT experts in the Center for Drugs (CDER) for further clarification on certified copies. Please see their response below.

As indicated in FDA's Final Guidance on Computerized Systems Used in Clinical Investigations, the term certified copy is defined as: "A certified copy is a copy of original information that has been verified, as indicated by a dated signature, as an exact copy having all of the same attributes and information as the original."

Further, the term original data is defined in the guidance as: "For the purpose of this guidance, original data are those values that represent the first recording of study data. FDA is allowing original documents and the original data recorded on those documents to be replaced by copies provided the copies are identical and have been verified as such (see FDA Compliance Policy Guide # 7150.13).

See: http://www.fda.gov/ohrms/dockets/98fr/04d-0440-gdl0002.pdf

As such, certified copies may be used to replace original data or source records.

Many institutions and sites are going to a fully electronic record system. It appears that the situation you describe may not conflict with FDA regulatory requirements. That said, it is always good to be able to ascribe a report to someone as these will likely be important study data. When FDA regulations on silent on a specific topic, we suggest developing standard operating procedures (SOP). These procedures will assist you in determining how to maintain records and, for those that could depend on the opinion/expertise of a particular person, how best to ensure they will always know who made the diagnosis/decision. Sites therefore have flexibility in how they handle documents at their sites because FDA's regulations do not specify how this must be done. The SOP that you develop might include instructions that documents how the original document with the wet signature will be obtained

The guidances listed below might be helpful to you.

Electronic Source Data in Clinical Investigations –
http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM328691.pdf

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

Kind regards,

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

This communication does not constitute a written advisory opinion under 21 CFR 10.85, but rather is an informal communication under 21 CFR 10.85(k) which represents the best judgment of the employee providing it. This information does not necessarily represent the formal position of FDA, and does not bind or otherwise obligate or commit the agency to the views expressed.

From: [redacted]
Sent: Wednesday, February 25, 2015 11:34 AM
To: OC GCP Questions
Subject: Questions Regarding Wet Ink Signatures for Trial Master File
Importance: High

We have always collected wet ink signatures for each of the documents below for inclusion into the Trial Master File.

Document		**Original** Signature **(Wet Ink)** Required **Yes or No**
Protocol and Amendment Signature Page	Site files	
FDA Form 1572	Site files	
Financial Disclosure Form	Site files	
Clinical Study Report Signature Page	Core files	

- Is this is still an FDA requirement to have wet ink signatures (original signature pages) for each of these documents?
- Is it acceptable to simply keep a "copy" of these documents?
- Are there perhaps other documents that require wet ink signatures that I have not listed here?

I appreciate your guidance. Thanks very much.

Kind regards, [redacted]