From: Beers Block, Patricia on behalf of OC GCP Questions
Sent: Tuesday, April 19, 2005 3:03 PM
To: [redacted]
Subject: RE: electronic TMF

Dear [redacted],

In general, our regulation covering the use of Electronic records and Electronic Signatures is found in 21 CFR 11 (Part 11) (see http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/CFRSearch.cfm?CFRPart=11). If you are maintaining records specifically required under 21 CFR 312, 21 CFR 56, and/or 21 CFR 812 in electronic form, in lieu of paper, those electronic records must meet the requirements of Part 11.

In answer to your specific question relating to inspection of electronic records, I would draw your attention to 21 CFR 11.10 which describes the necessary controls and procedures for a computer system to be compliant. Specifically 11.10 (b) requires the system to include:

(b) The ability to generate accurate and complete copies of records in both human readable and electronic form suitable for inspection, review, and copying by the agency. Persons should contact the agency if there are any questions regarding the ability of the agency to perform such review and copying of the electronic records.

In addition to reviewing Part 11, I would also refer you to the guidance on the scope and application of Part 11 that published in August 2003. You can find a copy at http://www.fda.gov/ohrms/dockets/98fr/5667fnl.pdf . There are several sections of this guidance that are relevant to your question and reflect a different approach than we have taken in the past.

First, we are interpreting Part 11 more narrowly with regards to records that come under the requirements of Part 11. Under the narrow interpretation of the scope of Part 11, with respect to records required to be maintained or submitted, when persons choose to use records in electronic format in place of paper format, Part 11 would apply. On the other hand, when persons use computers to generate paper printouts of electronic records, those paper records meet all the requirements of the applicable predicate rules, and persons rely on the paper records to perform their regulated activities, the *merely incidental* use of computers in those instances would not trigger Part 11. In such instances, FDA would generally not consider persons to be "using electronic records in lieu of paper records" under §§ 11.2(a) and 11.2(b).

There is also a section on copying records in the draft guidance which is specifically pertinent to your questions. The Agency intends to exercise enforcement discretion with regard to the specific Part 11 requirements for generating copies of records (§ 11.10 (b) and any corresponding requirement in §11.30). You should provide an investigator with reasonable and useful access to records during an inspection. All records held by you are

subject to inspection in accordance with predicate rules (e.g., §§ 56.115(b)).

We recommend that you supply copies of electronic records by

-Producing copies of records held in common portable formats where records are kept in these formats.

–Using established automated conversion or export methods, where available, to make copies in a more common format (including PDF).

In each case, we recommend that you ensure that the copying process used produces copies that preserve the content and meaning of the record. If you have the ability to search, sort, or trend Part 11 records, copies provided to the Agency should provide the same capability if it is technically feasible. You should allow inspection, review, and copying of records in a human readable form, on your site, using your hardware and software, following your established procedures and techniques for accessing those records.

In summary, I would recommend that you review the entire guidance referenced above as well as Part 11 and our draft guidance entitled "Computerized Systems Used in Clinical Trials" (see http://www.fda.gov/OHRMS/DOCKETS/98fr/2004d-0440-gdl0001.pdf) as you develop and implement your paperless clinical trial.

I hope this information is helpful.

Sincerely,

Patricia M. Beers Block
Special Assistant to the Director
Good Clinical Practice Programs
OSHC/Office of the Commissioner
301-827-3340

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.

-----Original Message-----
From: [redacted]
Sent: Wednesday, April 06, 2005 10:45 PM
To: 'gcpquestions@oc.fda.gov'
Subject: electronic TMF

I have a question relating to creating an electronic trial master file. Are there any guidance or companies that have successfully developed an electronic trial master file?

This would involve converting paper files to an electronic format. Does this process need to be validated? If the paper is scanned into a validated system, do you have to keep the paper or can it be destroyed?

Best regards,

[redacted]