From: OC GCP Questions
To: [redacted]
Cc: [redacted]
Subject: Clarifications
Date: Monday, April 11, 2016 11:33:06 AM

Good morning –

My office generally does not review specific SOPs however the scenario you describe may not conflict with FDA regulations. Additionally, below is language we have used in the past with regard to certified copies and scanned documents.

FDA's current regulations and guidances permit the interchangeable use of electronic and paper records for the archiving and protection of records provided records are maintained in a manner such that all regulatory requirements are met (e.g., records are maintained for 2 years after approval of the investigational drug product as required by 21 CFR Part 312, for drugs and biologics, and Part 812, for devices) the copies of required records preserve their content and meaning.

Source documents are considered to be the original records or certified copies. Use of a certified copy generally assumes that the original records are copied to a different media (e.g., electronic records such as a pdf file) for archiving purposes and the originals are destroyed. If it is decided to have a certified copy substitute for the original, it is recommended that you develop an SOP describing how such copies would be made verified and documented. The person who certifies the copy as an accurate and complete representation of the original, having all of the same attributes and information, should be the same person who actually made the copy from the original. Certification should be accomplished by having the person who makes the copy, sign or initial and date the copy to indicate it meets the requirements of a certified copy as described above. This should be described in the SOP and can be accomplished by initialing and dating each copy or by initialing and dating a document certifying copies in bulk. Whichever method is used the SOP should describe the procedure. (There are actually are number of ways to accomplish this, and the procedures described above are only suggested examples)

Some helpful links are below--

General Guidance on Good Clinical Practice - ICH E6
(www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/ucm073122.pdf)

ICH E-6 Good Clinical Practice: Consolidated Guidance defines "certified copy", however, the term is mentioned in the E6 definitions for "source data" and "source document":

"1.51 Source Data: All information in original records and certified copies of original records of clinical findings, observations, or other activities in a clinical trial necessary for the reconstruction and evaluation of the trial. Source data are contained in source documents (original records or certified copies)."

"1.52 Source Documents: Original documents, data, and records (e.g., hospital records, clinical and office charts, laboratory notes, memoranda, subjects' diaries or evaluation checklists, pharmacy dispensing records, recorded data from automated instruments, copies or transcriptions certified after verification as being accurate and complete, microfiches, photographic negatives, microfilm or magnetic media, x-rays, subject files, and records kept at the pharmacy, at the laboratories, and at medico-technical departments involved in the clinical trial)."

Guidance on Computerized System in Clinical Investigations
www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM070266.pdf

Certified Copy means a copy of original information that has been verified, as indicated by dated

signature, as an exact copy having all of the same attributes and information as the original."

Electronic Source Documentation in Clinical Investigations (draft)

www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM239052.pdf

Part 11, Electronic Records; Electronic Signatures--Scope and Application, Guidance for Industry

www.fda.gov/downloads/RegulatoryInformation/Guidances/UCM126953.pdf

4. Copies of Records The Agency intends to exercise enforcement discretion with regard to 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., §§ 211.180(c), (d), and 108.35(c)(3)(ii)). We recommend that you supply copies of electronic records by:

- Producing copies of records held in common portable formats when records are maintained in these formats

- Using established automated conversion or export methods, where available, to make copies in a more common format (examples of such formats include, but are not limited to, PDF, XML, or SGML)

In each case, we recommend 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 given to the Agency should provide the same capability if it is reasonable and technically feasible. You should allow inspection, review, and copying of records in a human readable form at your site using your hardware and following your established procedures and techniques for accessing records.

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

From: [redacted]
Sent: Monday, April 11, 2016 10:39 AM
To: [redacted]
Cc: OC GCP Questions
Subject: RE: Clarifications

Dear All,

Request you to clarify the below.

Best regards,

[redacted]

From: [redacted]
Sent: Monday, April 04, 2016 6:59 PM
To: [redacted]
Cc: OC GCP Questions
Subject: RE: Clarifications

Dear [redacted],

Hope you are doing fine.

With regards to the below email, please let me know if the process described below is fine.

We receive CRFs in batches and scan these. However, the scanner that we use is not GxP certified. Hence, to certify these **electronic copy** we follow the below.

Certification process involves two steps.

Step 1: The first step is to authorise that the scanner scans the image and provides the electronic copy having all the information as the original for the randomly selected pages.

- Select randomly **at least 10 pages** from each batch and scan them. (We could receive 100s/1000s of CRFs in one batch)
- Verify that the electronic copy is an exact copy of the original having all of the same attributes and information (one to one match).

Step 2: Scan all CRFs and verify the following minimum requirements are met:

- Number of original pages against the number of pages in the electronic copy
- No blank or skewed pages
- No content-obstructing marks.

The above 2 steps are documented by date and signature of the person doing this.

Best regards,

[redacted]

From: [redacted]
Sent: Thursday, May 21, 2015 6:31 PM
To: [redacted]
Cc: OC GCP Questions
Subject: RE: Clarifications

Hi [redacted],

My earlier response to your qn#2 **does not say** one needs to date and sign on every page!

Once verification process is fully completed, you can indicate that the copies are copies of original information having all of the same attributes and information as the original as indicated by a dated signature. That can be done on a single page.

Thanks,
[redacted]

From: [redacted]
Sent: Tuesday, May 19, 2015 11:50 PM
To: [redacted] OC GCP Questions
Subject: RE: Clarifications

Dear [redacted]

Thank you very much for your reply on this.

Pertaining to your response to the 2nd question: I still feel that it is cumbersome to manually verify, date and sign all records against the original especially when you have 1000s of scanned copies.

Can you please suggest of any other alternative(s).

Best Regards,
[redacted]

From: [redacted]
Sent: Monday, May 18, 2015 6:53 PM
To: [redacted] OC GCP Questions
Subject: RE: Clarifications

Hi [redacted],

Please my responses below. Regards, [redacted]

From: [redacted]
Sent: Monday, May 18, 2015 12:02 AM
To: OC GCP Questions; [redacted]
Subject: Clarifications

Dear All,

To introduce myself, I am [redacted] working as a data management specialist at [redacted] I had an opportunity to attend the FDA Clinical Trial Requirements Regulations, Compliance, and GCP conference jointly sponsored by SOCRA at Cincinnati, which I felt was really good.

I had a couple of questions. Kindly request you to clarify me:

1. How are the sponsors notified of any changes/updates in the regulations? Sponsors are notified about new regulations through **Federal Register Notice**.
2. You state that certified copies must be generated using a verified process that produces copies with the same content and meaning as original. Kindly elaborate

"verified process"? In case we use a scanning machine to scan documents, (for example data clarification forms) which are sent by the monitors to us for further processing, how should we ensure compliance to this requirement. Is it fine to check the contents of the original with the copy (randomly if we scan 100)?
The process includes making sure that copies of original information have been verified, as indicated **by a dated signature**, as an **exact copy having all of the same attributes and information as the original**. You would need to verify **"all"** documents.

Thank you in advance.

Best Regards,

[redacted]