From: OC GCP Questions
To: [redacted].
Subject: GCP question regarding electronic Investigator Site Files
Date: Thursday, December 01, 2016 6:31:00 AM
Attachments: [redacted]

Dear [redacted] –

Here is the cleared response from CDER OMP.

Response: Provided that your cloud based file system meets 21 CFR part 11 controls (see 21 CFR 11.10 and 11.30) including the requirement that appropriate access controls be in place to limit access to authorized users (see 21 CFR 11.10(d)), we would find your approach acceptable for meeting FDA record keeping and record retention requirements (see 21 CFR 312.62).

Kind regards,

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

From: [redacted]
Sent: Wednesday, November 30, 2016 12:08 PM
To: OC GCP Questions
Subject: Re: GCP question regarding electronic Investigator Site Files

Hi Doreen,
Many thanks. I was just concerned that it had gotten caught up in SPAM or Junk.
Best,
[redacted]

[redacted]

From: OC GCP Questions <gcp.questions@fda.hhs.gov>
Date: Wednesday, November 30, 2016 at 9:14 AM
To: [redacted]
Subject: GCP question regarding electronic Investigator Site Files

Dear [redacted] –

Thank you for your phone call regarding your email. I had to send your initial email the Center for Drugs (CDER) Office of Medical Policy (OMP) for an answer. Sometimes they take longer than we do to get a cleared response. I communicated with them today and they stated they should be able to send a response tomorrow. I will forward their response as soon as I receive it.

Thank you for your patience.

Kind regards,

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

U.S. FOOD & DRUG ADMINISTRATION

From: [redacted]
Sent: Tuesday, November 08, 2016 1:03 PM
To: OC GCP Questions
Subject: GCP question regarding electronic Investigator Site Files

To Whom It May Concern:

We would like your guidance on the acceptability, based on ICH GCP E6(R1) and R2 of the following solution for maintaining Investigator regulatory documents (eISF):

We are using a cloud-based file solution we have configured using an existing electronic file sharing system. We have confirmed that the system meets 21 CFR Part 11 using our processes and the system's features. We have configured this file system to be used to maintain the site's regulatory documents in addition to the

Sponsor's eTMF. These folders align with the DIA reference model for the eTMF.

1. The folders have role-based access. Personal identifying information (e.g. certified copies of informed consents and investigator assessment of clinical significance on lab reports) are maintained in folders that are only accessible by the site staff, monitors, and auditors as stated in the informed consent.
2. The file system is configured, tested, and user roles administered by the CRO. Only users with specific roles and at specific sites can access a specific site's eISF.
3. Site users (Principal Investigator, Subj Investigators, Study Coordinators, and any other staff members identified by the site) are granted access to their site's folders and documents after completing training.
4. The site staff can upload and download any document in their site's folders. These documents include both the site's regulatory documents and all reference documents and training materials that have been provided to the site.
5. The site uploads documents to a "Draft folder" for review by the CRO. If the document is complete and correct, the CRO files the document in the appropriate folder for the site.
6. The site has access to a document describing where each document type is filed.
7. Each month, the CRO also runs an audit trail report and files it in the site's eISF so the Site staff know who has accessed their electronic Investigator Site File.
8. At the end of the trial, all site documents are archived as PDF documents and the site is provided with an archive of their site's files.
9. Once the site archive is completed, the documents are merged into the electronic TMF for archiving of the entire eTMF.
10. During the trial, duplicative documents are not collected and maintained separately in two different systems (eISF and eTMF). Documents, such as the signed 1572, financial disclosures, and protocol signature pages are maintained in each site's eISF for the duration of the trial. The Sponsor and CRO have access to the site's eISF (excluding any documents with subject personal identifying information) so all documents are available—but it assures that there is only one version in the Study files for both the eTMF and the eISF.

The questions we have are as follows:

1. Does this approach meet the requirements for the site maintaining control of their regulatory documents as defined in ICH E6 R 1 and 2 since sites can have access granted to any site staff needed to maintain their regulatory documents, they can access the documents from anywhere, and they can download or upload any documents?
2. Does the approach of having access to both the electronic Investigator Site File and the electronic Trial Master Files by the Sponsor (only for documents that do not include PHI) meet the requirements listed in ICH GCP E6 (R1 and R2)?

Thank you in advance for your guidance.

Kind regards,

[redacted]