VCU Office of the Vice President for Research and Innovation

Monitoring and Source Documentation for Clinical Studies utilizing Veeva SiteVault

Purpose:

To establish standard processes and procedures for conducting on-site and remote monitoring visits for clinical studies that are utilizing Veeva SiteVault. To describe the site and study specific methods for generating source documents and the procedures for reviewing source documents (or copies) during monitoring process.

Definitions:

Monitoring: The act of overseeing the progress of a clinical trial, and of ensuring that it is conducted, recorded, and reported in accordance with the protocol, Standard Operating Procedures (SOPs), Good Clinical Practice (GCP), and the applicable regulatory requirement(s).[1]

Centralized/Remote monitoring: A remote evaluation carried out by sponsor personnel or representatives (e.g., clinical monitors, data management personnel, or statisticians) at a location other than the sites at which the clinical investigation is being conducted. Centralized monitoring processes can provide many of the capabilities of on-site monitoring as well as additional capabilities.[2]

On-site Monitoring: An in-person evaluation carried out by sponsor personnel or representatives at the sites at which the clinical investigation is being conducted.[2]

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]

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 copies, microfiches, photographic negatives, microfilm or magnetic media, x-rays, subject files, and records kept at the pharmacy, at the laboratories, and medico-technical departments involved in the clinical trial).[1]

Essential Documents: Those documents which individually and collectively permit evaluation of the conduct of a trial and the quality of the data produced. These documents serve to demonstrate the compliance of the investigator, sponsor and monitor with the standards of Good Clinical Practice and with all applicable regulatory requirements.
PHI: Protected Health Information.

HIPAA Privacy Rule: Provides federal protections for personal health information held by covered entities and gives patients an array of rights with respect to that information. At the same time, the Privacy Rule is balanced so that it permits the disclosure of personal health information needed for patient care and other important purposes (such as research).[3], [4]

[1] ICH-GCP E6(R2). 2016. Integrated Addendum to ICH E6(R1): Guideline for Good Clinical Practice
[2] FDA.gov, 2013. Oversight of Clinical Investigations — A Risk-Based Approach to Monitoring
[3] HHS.gov, 1996. Health Insurance Portability and Accountability Act of 1996
[4] HHS.gov, 1996. HIPAA for Professionals

Certified Copy: A copy (irrespective of the type of media used) of the original record that has been verified (i.e., by a dated signature or by generation through a validated process) to have the same information, including data that describe the context, content, and structure, as the original.[1]

Initiating the Monitoring Process:

Prior to beginning the monitoring process, it is expected that monitors will adhere to all applicable policies and procedures established by Virginia Commonwealth University (VCU).

Before scheduling a monitoring visit:

- Monitors should review the study protocol, approved informed consent form, clinical trial agreement and monitoring plan to ensure that the proper approvals are in place to access and/or copy essential and source documentation. Review of documentation not clearly outlined and approved will not be permitted.
- Monitors must review and sign the Study Source Plan (if being utilized).[5]

Purpose, Training and Reference Materials:

1. Veeva SiteVault:
   - System Purpose: To provide an electronic investigator site file used to hold regulatory and source documentation for clinical studies.
   - Training: It is suggested that external users who previously have not used SiteVault watch the videos under reference materials to be able to perform their review more efficiently.
   - Reference Materials: Videos designed for study monitors. Please note that these videos refer to "SiteVault Free" and VCU has "SiteVault Enterprise;" however these videos are also applicable for the enterprise version.
   - Account Creation: Site Administrators have the ability to create external user accounts. Site Administrators should confirm whether the external user already has an existing account prior to the creation of a new one. Site Administrators are prohibited from creating or modifying any other tyoe of user account other than an external user account.

Visit Methods:

VCU allows for on-site and remote monitoring[6].

On-Site Monitoring:

- Monitors may request access to the electronic systems at the time of their first monitoring visit or per the study contract.
- Monitors must provide notice of at least the minimum number of days specified in the study contract prior to scheduling an on-site visit.
- Monitors must adhere to VCU's operating hours of Monday-Friday, 9 a.m.–5 p.m. EST.
- When within patient care areas (i.e., pharmacy, clinic, operating room), monitors must wear closed-toed shoes, refrain from directly interacting with patients, refrain from eating and drinking, limit work-related calls, and refrain from personal calls. Monitors must abide by any policies set forth by either VCU or VCUHS (dependent on location of visit).

[5] A Study Source Plan helps organize and track current source document generation and review practices. They can be amended over time as needed.
[6] The regulations are not specific about how sponsors are to conduct monitoring and are therefore compatible with a range of approaches to monitoring that will vary depending on multiple factors.[2]

Remote Monitoring:

- It is required for the primary study coordinator to be made aware of and approve remote monitoring visits before they occur as per the minimum specified days in the study contract.
- During the remote monitoring process, it is expected that patient confidentiality be upheld according to the signed research informed consent, protocol and clinical trial agreement. Therefore, if monitors can access PHI remotely, they should be conscious to access sensitive information (including PHI) only in private areas to prevent unauthorized access of that sensitive information. Monitors should never download or retain copies of documentation containing PHI onto any computer or device.
- The ability to access PHI remotely for monitoring varies study by study. If remote access to PHI is permitted, monitors must ensure that the following approvals are in place:

    - Research Informed Consent Form: The HIPAA Privacy Rule establishes the conditions under which protected health information may be used or disclosed by covered entities for research purposes.[7] A Waiver of HIPAA Authorization is required to remotely share PHI with monitors, and must inform the research participant of the purpose, process, and information shared.

        1) Authorization of Core Elements
        2) Authorization Required Statements

    - Clinical Trial Agreement: The clinical trial agreement must not prohibit disclosing PHI remotely. The clinical trial agreement must also not contain language describing study monitoring methods that conflict with remote monitoring and remote access to PHI.
    - Study Protocol: The study protocol must not prohibit the ability to disclose PHI remotely. The protocol must also not contain language describing study monitoring methods that conflict with remote monitoring and remote access to PHI.
    - Monitoring Plan: As monitoring plans are not under the control of research sites, monitors must ensure that they include the ability to access PHI remotely during the monitoring process.

- If a study requires that only redacted source documents be available remotely for monitoring, all HIPAA identifiers will be expunged from source documentation.

Process for Monitoring Source and Essential Documents:

To conduct monitoring, there must be an understanding of the quantity and types of source data that must be verified against CRFs. Source documents that originated in EPIC should remain in EPIC and should be monitored in EPIC. Since the process for generating and reviewing source documents varies study by study, monitors should reference the most current, signed Study Source Plan (if used).[5] The Study Source Plan outlines the following:

- **Source Generation**: The process for the initial creation of the source document. The source generation section of the Study Source Plan describes:

    - If the source is paper or electronic
    - System name (if applicable)
    - Vendor (if applicable)
    - If the source is generated for routine care and/or research purposes

[7] NIH.gov. How Can Covered Entities Use and Disclose Protected Health Information for Research and Comply with the Privacy Rule?

- Signature method
- Data originator
- Transcription method to case report forms (CRFs)

- **Source Review**: The process for providing access to source documents and source data. The source review section of the Study Source Plan describes:

  - If direct system login will be provided to study monitors
  - On-site monitoring details such as source document access method, inspectable document type provided and if an audit trail will be accessible while on-site
  - Remote monitoring details such as access method, inspectable document type provided and if an audit trail will be accessible while off-site

In some cases, monitors may be provided with copies of source documents in place of originals. When able and reasonable, monitors will be provided with certified copies of original source documents.

Other Applicable Regulations:

- Code of Federal Regulations
  - 21 CFR 312 – Investigational New Drug Application

- ICH E6: Harmonized Tripartite Guideline for Good Clinical Practice
  - Section 1.38 - Monitoring
  - Section 4.1 - Investigator's Qualifications and Agreements
  - Section 4.2 - Adequate Resources
  - Section 4.9 - Records and Reports
  - Section 5.18 - Monitoring
  - Section 8 - Essential documents for the Conduct of a Clinical Trial

Contact

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Revision/Change History

Date	Version	Change History
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03/29/2023	2.0	Added contact information