Veeva SiteVault: Use of Electronic Signatures

Purpose:

To document standard processes and procedures for use of 21 CFR, Part 11 compliant electronic signatures in research at Virginia Commonwealth University (VCU).

Scope:

This procedure applies to the use of electronic signatures for research at VCU.
Electronic signatures will be used by the following VCU personnel for research activities: the investigator and investigator delegates, site administrative, and operations personnel.

Responsibility:

VCU personnel will be responsible for both performing and complying with this SOP and assuring the appropriate personnel are trained on this SOP.

Definitions:

ERES: Electronic Records and Electronic Signatures

eISF: electronic Investigator Site File. The computer system used to house Essential Documents required for the conduct of clinical research by the investigator.

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. Often referred to as regulatory documents[1].

ISF: Investigator Site File. The investigator site file includes all Essential Documents which individually and collectively permit evaluation of the conduct of a trial and the quality of the data produced by the investigator. These documents serve to demonstrate the compliance of the investigator with the standards of Good Clinical Practice and with all applicable regulatory requirements. The ISF does not include the full scope of Trial Master File documents which apply to the sponsor role in research.

Letter of Non-Repudiation Agreement: A letter of Non-Repudiation Agreement for digital signatures must be submitted to the FDA prior to registering as a transaction partner for the FDA ESG[2]. The letter must be submitted (preferably on company letterhead) and signed with a traditional handwritten signature.

Validation of Computer Systems: A process of establishing and documenting that the specified requirements of a computerized system can be consistently fulfilled from design until decommissioning of the system or transition to a new system. The approach to validation should be based on a risk assessment that takes into consideration the intended use of the system and the potential of the system to affect human subject protection and reliability of trial results.[3]

Policy Statement

[1] ICH-GCP E6(R2), 2016. Integrated Addendum to ICH E6(R1): Guideline for Good Clinical Practice. 1.23 Essential Documents (link)
[2] FDA Electronic Submission Gateway, Appendix G: Letters of Non-Repudiation (link)
[3] ICH-GCP E6(R2), 2016. Integrated Addendum to ICH E6(R1): Guideline for Good Clinical Practice. 1.65 Validation of Computer Systems (link)

It is the policy of VCU that electronic signatures may be used for the conduct of research in accordance with ICH-GCP and FDA regulations allowing use of electronic signatures in clinical investigations. Veeva SiteVault is the system used for electronic management of the Investigator Source File (ISF), electronic signature is validated in this system.

Compliance Statement

A letter of Non-Repudiation Agreement has been filed with the FDA for VCU on January 26, 2023.

Veeva Vault has been validated by Veeva Systems in accordance with industry-standard validation guidelines and regulations (e.g. 21CFR820.75, 21CFR211.68, 21CFR11, EU Annex 11). Computer System Validation (CSV) documentation for SiteVault is available with each release.

Background

On March 20, 1997 (Federal Register Vol. 62 No 4), the Food and Drug Administration (FDA) published a set of regulations that define “the criteria under which the agency considers electronic records, electronic signatures, and handwritten signatures executed to electronic records to be trustworthy, reliable, and generally equivalent to paper records and handwritten signatures executed on paper.” The regulation is divided into three subparts that cover a) General Provisions; b) Electronic Records, and c) Electronic Signature. In 2003, the FDA published guidance on the application of Part 11, indicating agency intent to enforce “all predicate rule requirements, including predicate rule record and recordkeeping requirements,” but that “fewer records will be considered subject to part 11;” and further noted that Part 11 would be “interpreted narrowly.” The following controls were highlighted as being critical:

- limiting system access to authorized individuals
- use of operational system checks
- use of authority checks
- use of device checks
- determination that persons who develop, maintain, or use electronic systems have the education, training, and experience to perform their assigned tasks
- establishment of and adherence to written policies that hold individuals accountable for actions initiated under their electronic signatures
- appropriate controls over systems documentation
- controls for open systems corresponding to controls for closed systems bulleted above
- requirements related to electronic signatures

Veeva deploys and maintains software applications that are intended to satisfy predicate rule requirements.

Procedures:

Veeva SiteVault enables compliant electronic signatures to be captured on documents in accordance with ICH-GCP and FDA regulations. Signatures, approvals, or acknowledgement of documents by site users will be collected in the system as described in the User Requirement Specifications and Validation documents and in compliance with 21 CFR, Part 11.

References

- ICH E6 (R2): Harmonized Tripartite Guideline for Good Clinical Practice
- FDA E6(R2) Good Clinical Practice: Integrated Addendum to ICH E6(R1)
- FDA Guidance for Industry: Computerized Systems Used in Clinical Investigations, 2007

- FDA Guidance for Industry: Electronic Source Data in Clinical Investigations, 2013
- FDA Part 11, Electronic Records; Electronic Signatures - Scope and Application, 2003
- CFR Title 21, Part II
- FDA Use of Electronic Records and Electronic Signatures in Clinical Investigations Under 21 CFR Part 11 – Questions and Answers, 2017
- FDA Letters of Non-Repudiation Agreement, Appendix G
- Veeva SiteVault Validation Documents

Contact

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Revision/Change History

Date	Version	Change History
02/22/2023	1.0	Initial
03/29/2023	2.0	Added contact information