University of Nebraska Medical Center

Center for Clinical and Translational Research Standard Operating Procedure

Nebraska Medicine

Section: **Clinical Research Center** Date Created: **July 1, 2019**

Title: **Management of Regulatory Documents - eReg** Version Date: **January 1, 2023**

SOP Number: **SM12**

PURPOSE:

Essential regulatory documents will be maintained for research conduct at UNMC/NM to assure compliance with regulatory requirements.

SCOPE:

Essential Documents are 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 (GCP) and with all applicable regulatory requirements.

PERSONNEL RESPONSIBLE:

Sponsor
Sponsor-Investigator
Principal Investigator
Regulatory Designee
Monitor
IND Coordinator

DEFINITIONS:

- **21 CFR Part 11 Compliant** – steps taken to validate and verify compliance with 21 CFR Part 11 regulatory requirements to permit electronic signature use in place of wet signatures in research activities.
- **eReg** – a software application of Advarra. UNMC/NM has licensed eReg to support its clinical research enterprise. eReg has been validated to be compliant with 21 CFR Part 11.
- **Essential Documents:** Documents that individually and collectively permit evaluation of the conduct of a study and the quality of the data produced.
- **Good Clinical Practice (GCP):** A standard for the design, conduct, performance, monitoring, auditing, recording, analysis, and reporting of clinical trials that provides assurance that the data and reported results are credible and accurate, and that the rights, integrity, and confidentiality of trial subjects are protected.
- **Principal Investigator (PI):** The person who is responsible for the management and integrity of the design, conduct, and reporting of the research project and for managing, monitoring, and ensuring the integrity of any collaborative relationships.

- **Regulatory Binder:** Contains all study-specific information and regulatory documentation. It organizes essential documents, provides easy access to essential documents by the trial monitor, auditor, IRB, or regulatory authorities (e.g., Office for Human Research Protections, FDA) for review/audit purposes, and allows research team members to reference information.
- **Source Documents:** Original documents, data and records (e.g., hospital records, clinical and office charts, laboratory results, memoranda, subjects' diaries or evaluation checklists, pharmacy dispensing records) that contain the first recording of pertinent information.
- **Sponsor:** An individual, company, institution, or organization that takes responsibility for the initiation, management, and/or financing of the research.

PROCEDURES:

Study regulatory files are maintained by the Sponsor or Sponsor-Investigator, established at the beginning of the trial and updated and maintained on a continuous basis during the course of the trial.

An investigator regulatory binder, a collection of all essential documents, is maintained by the Principal Investigator/Study Coordinator/Regulatory Coordinator who is responsible for updating and maintaining the files on a continuous basis during the course of the trial.

The regulatory files will be maintained electronically using the Advarra eReg application to collect and manage clinical protocol, staff, and institution documentation. Advarra eReg supports 21 CFR Part 11 compliant document management and approval of documents using electronic signatures. This application has been validated (*see Advarra eReg CFR Part 11 Compliance*) to ensure the authenticity, integrity, and, when appropriate, the confidentiality of electronic records, and to ensure that the signer cannot readily repudiate the signed record as not genuine. eReg will also be used to create and maintain electronic Delegation of Authority (DOA) logs for each study (*see SM16 Delegation of Authority Process).*

Paper documents will be scanned, and the image will be saved as a PDF file and uploaded to eReg. The uploaded PDF will become the official source document. The original paper document will be destroyed following UNMC/NM document destruction policies once the PDF has been uploaded.

All document signers will be required to complete a Signature Sample Form (Addendum A). This form documents the signer's printed name, initials, and signature in their own handwriting.

After completion, the document will be scanned, and a PDF will be uploaded to the signer's contact record in eReg. This document will link a signer's wet signature on any study document to their electronic signature in eReg.

A standardized folder structure, known as a regulatory template in eReg, will be uniformly assigned to all regulatory binders. Additional details about this structure can be provided upon request.

Audit, financial, and contractual information are not subject to regulatory review and will not be made available. Screening and enrollment logs will not be maintained in the regulatory binder/files.

The regulatory binder will be subject to review by the Sponsor or their representatives. Monitors will be required to complete eReg training and sign the required system access forms. Once confirmation of training has been received, a user account will be setup and access to the study-specific regulatory binder will be granted. Access will be granted by the regulatory coordinator the day(s) of the monitor visit. Access will be terminated at midnight on the last day of visit.

The regulatory documents stored in Advarra eReg will be maintained for the period specified in the study protocol, clinical trial agreement, institutional policies, cooperative study group policies, and/or research regulation for whichever period is longer. Electronic documents will be archived indefinitely within Advarra eReg and hard copy documents will be sent to long term storage following study closure with the IRB of record.

Regulatory binders will not be provided in any other format.

ASSOCIATED FORMS:

Signature Sample Form

RESOURCES:

eReg Validation Plan

eReg and EDC Administration SOP Electronic Data Capture System (EDC) 3 Jun 2021

eReg and EDC Change Management SOP 2.0 3 JUN 2021

eReg and EDC Good Documentation Practices for Test Execution SOP 2.0 3 JUN 2021

eReg and EDC Risk Assessment SOP 2.0 3 JUN 2021

eReg and EDC Training SOP 2.0 3 JUN 2021

21 CFR Part 56: Institutional Review Boards
21CFR Part 312: Investigational New Drugs
21CFR Part 812: Investigational Device Exemption

Essential Regulatory Documents Guidance : https://nccih.nih.gov/sites/nccam.nih.gov/files/CR-Toolbox/Regulatory_Binder_Guidance_and_Tabs_ver2_07-17-2015.pdf

Department Approval

Signed Katie Penas Signed: 2/21/2023
Clinical Research Manager

Signed _____ Signed: 4/3/2023
Assistant Vice Chancellor for Clinical Research

Addendum A

Signature Sample Form

A copy of this form will be placed along with your credentials in the eRegulatory (eReg) software.

Printed Name: _____

Initials: _____

Signature: _____

Date: _____