SIGNED, SEALED, DELIVERED:

Streamlining Regulatory Processes with eSignatures

A COMPLION WHITEPAPER

People have a hard time letting go of their suffering. Out of a fear of the unknown, they prefer suffering that is familiar.

- Thich Nhat Hanh

Jeremy Rigby, MBA
President
Advanced Clinical Research

Neal Surasky, CCRC
Director of Compliance
Chesapeake Research Group, LLC

Lisa Bozza Archer
Customer Success Manager
Complion, Inc.

Table of Contents

Background 2
Introduction 2
eSignature Adoption in Clinical Research 3
Understanding the Regulations 3
Reasons to make the Switch 4
Sponsor and CRO Adoption 4
Getting Physicians and Staff On Board 5
Best Practices and Lessons Learned 6
About Complion 7

BACKGROUND

This article is based on information presented in the webinar, *Signed Sealed, Delivered: Streamlining Regulatory Processes with eSignatures* presented by, Jeremy Rigby, MBA, President of Advanced Clinical Research, Neal Surasky, CCRC, Director of Compliance at Chesapeake Research Group, LLC, and Lisa Bozza Archer, Customer Success Manager at Complion.

INTRODUCTION

Jeremy Rigby, President of Advanced Clinical Research, recalls a time when one of their PIs went on vacation. "He was on an annual bicycle trip in a rural area. We had an urgent document that needed to be signed. He'd already reviewed it, but we didn't have the final document for signature yet. We had to track him down out in the Midwest somewhere, and figure out what small town he was going to be passing through on his bike trip. We found a little motel there that was willing to accept a fax from us, and he stopped and interrupted his trip, took a detour and signed this document, and they faxed it back for us."

That example, while extreme, is indicative of the kinds of hassles and inefficiencies many clinical research sites and organizations has to deal with. "When you added up all the time, day in and day out, just getting signatures was pretty time-consuming," says Jeremy.

Neal Surasky, Director of Regulatory at Chesapeake Research Group (CRG), can identify with Jeremy's story. "I can think of sponsors who wouldn't even have accepted the fax, as they have to have a wet ink signature, and that was really problematic," and equally time-consuming.

"I remember days where I would be standing in a hallway outside of a patient room waiting for a doctor to come out to sign something that we needed immediately," Neal recalls. And there were other issues. "We started adding investigators, but they weren't on-site all the time. They would maybe be on site once a week for their particular study to come in, and we would have to wait for them to come in, or ask them—or beg them, I should say—to just swing on by to sign a financial disclosure form or some other training document." Neal says.

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ESIGNATURE ADOPTION IN CLINICAL RESEARCH

But times are changing. Across the industry, research sites are at various points along the path from paper to paperless. That leaves some organizations in what's often referred to as a "hybrid process," often replicating processes and documents both in paper and on shared drives. "It's very redundant and it's quite burdensome," says Lisa Bozza Archer of Complion.

The end goal of transitioning to electronic regulatory (eRegulatory) systems and electronic signatures (eSignatures) is to have everything in one place, to have a single source of truth in order to increase efficiency and compliance. "That sounds great and exciting to people," Lisa says, "and many sites have taken that leap." But fear of change often inhibits progress for others. Another opportunity for simplification is to evaluate best practice templates that leading institutions are willing to share. Take advantage of opportunities to adopt templates, such as a CV, to simplify your transition toward digitizing documents.

Achieving that efficiency and allaying those fears is a matter of identifying the regulations that govern the use electronic documents and signatures, understanding eSignature adoption trends in clinical research, drawing on the experience and insight of others, and applying the best practices and lessons learned in that transition.

UNDERSTANDING THE REGULATIONS

For over 20 years, the FDA has allowed electronic records and signatures in research. The set of regulations known as 21 CFR Part 11 was created to make the FDA feel comfortable knowing that electronic documents and signatures are trustworthy and that the information can be relied on when the FDA makes a decision about a marketing application. Simply put, Part 11 applies to any site that relies on electronic records or signatures to meet an FDA requirement.

Four main components of 21 CFR Part 11 compliance:

1) **Functional Requirements**: System must have specific controls in place to ensure that an electronic record is trustworthy - including audit trails; generation of accurate and complete records; limiting system access to authorized users; and operational system checks.
2) **Validation**: Generally speaking, validation is the process for demonstrating that a computer system or software does what it is intended to do, and will be able to do so consistently over time. The system must be validated upon implementation and with major releases.
3) **Policies and Procedures**: Site must maintain policies or SOPs, including policies for records management, records management, electronic signatures, software maintenance, and training. Letter of non-repudiation must be submitted to FDA.
4) **Training**: Sites must ensure that users have adequate system training.

To learn more about Part 11, read *Ensuring Compliance with Part 11: A Site's Perspective*.

REASONS TO MAKE THE SWITCH

What drove CRG to finally adopt eSignatures? "We got tired of doing it every other way," Neal says. "As soon as we adopted the eRegulatory platform, I wondered why we didn't do this sooner. It just made things so much easier." Plans were already in place to add investigators, and CRG was even considering adding an out-of-state site.

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Business Growth

Business growth was also a critical factor in ACR's decision to adopt eSignatures. "As we grow to multiple locations, being able to manage all of the regulatory framework really motivated us to find a solution to getting signatures and being more efficient. And knowing that the technology is there, and the regulatory framework had been around for a long time, it just seemed like the right step for us to take," Jeremy says.

Reduce Burden

In terms of real, measurable results, many research organizations adopt eSignatures to reduce their burdensome paperwork and expedite the signature process. One organization's eSignature process went from 58 days to four days, with a corresponding savings of approximately $250,000 in paper-related costs during the first year of implementation. The improvements can be dramatic.

Reduce Costs

Site also see value in reducing document handling costs and eliminating the need to manually prepare, ship, and archive paper documents. Increases in staff productivity and operational efficiency also result from providing PIs and staff with the ability to sign documents via mobile devices. In turn, staff spend less time filing, archiving, and retrieving signed documents, and gain greater visibility over outstanding activities, without the need to maintain separate logs.

Security and Compliance

Security and compliance are also strengthened. Embedded audit trails and signatures ensure that every record is signed using the correct format. This reduces the likelihood of losing a document.

SPONSOR AND CRO ADOPTION

Of course, an organization working to adopt a new process may encounter a few hurdles. "We were early adopters of eRegulatory with eSignature technology," says Jeremy, "when we rolled it out, some monitors immediately saw the value. Others weren't sure what to do.'" But they quickly came around thanks to short training videos Complion provides for eRegulatory system in use. "That gets people on board pretty quickly," Jeremy says.

"On occasion we meet some resistance from sponsors or some CROs on specific documents, like a 1572 or a financial disclosure," Jeremy reports. "When we set the expectations at the beginning of the relationship, when we're talking about study feasibility, and pre-site visits, and the site initiation visit, we go out of our way to make sure that the companies we're working for understand that this is what we're doing."

"The doctors absolutely love it. I am getting much quicker responses from the doctors than I ever would've imagined because they're not waiting for people to follow them around the building or stand outside the door."

As adoption industry-wide increases, resistance is waning. "At this point it seems like this is much more commonplace, so we don't run into many hurdles," Jeremy says.

What if your Sponsor or CRO has an objection? "This technology and the concept of electronic signatures has been around for almost two decades," Neal says. "As long as you have the documentation in place to show them that the system you're using is compliant, and that your electronic signatures actually are the equivalent of their handwritten signatures, they will come around." Neal reports that CRG no longer uses wet signatures.

GETTING PHYSICIANS AND STAFF ON BOARD

From the perspective of coordinator or regulatory person, the prospect of shifting from a familiar paper-driven process to something new can trigger feelings of uncertainty. "They are really good at what they do and they work hard," Lisa says. And while the new process is actually less work, it's an unknown. "Once you send an electronic document out, it's no longer in your hands. It's about the feeling of security when holding that document, losing that feeling of control," Lisa shares. Those feelings are real, but they can be overcome.

The level of eSignature adoption varies from organization to organization. Across different sites, what's appropriate for different people depends on their own process and their own means of adoption. Everybody has a different pace, and that's okay. Those differences in the manner and pace of adoption are reflected in the experiences at CRG and ACR.

"We haven't had any problems there," says Jeremy. "The concept is very well-received by everybody who's involved on our side, as well as by most on the sponsor side." The transition was smoothest among those who are more IT-savvy. Others needed some training. "But once they understood the efficiencies that were gained by doing this, we really didn't have any problems. It's just been great."

Doctors at ACR particularly appreciate that they can use their smartphones to sign documents, and that "they don't have somebody chasing them around between patients," Jeremy says.

For CRG, Neal's initial expectation was that staff would quickly get on board, but he had concerns about adoption among the PI and sub-investigators. "It turned out to be quite the opposite," Neal admits.

"The doctors absolutely love it. I am getting much quicker responses from the doctors than I ever would've imagined because they're not waiting for people to follow them around the building or stand outside the door." Wherever they are, doctors can use their smartphones, "and in less than a minute from the time that I send them their email that they have something to sign, it's signed. They love that, I love that, it's a win-win."

BEST PRACTICES AND LESSONS LEARNED

Overcoming those concerns and driving adoption is a matter of drawing on the experiences of other organizations that have made the transition.

Partner with the right vendor

"The most important thing is to find the right vendor," Jeremy suggests. "As we looked at it, it was clear that this was outside of our expertise. Make sure you have a good vendor that can handle it, because you have to have somebody that you're confident is going to manage it right." Ultimately, Part 11 compliance is the site's responsibility. "Even if we hire a vendor, it's still up to us, so you have to make sure that you have a vendor that you're confident in their ability to manage that for you," Jeremy says.

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Setup policies and SOPs

Another critical consideration is to ensure that your internal processes will support and complement eSignatures. "Make sure you have the right SOPs in place and communication ready for sponsors on how you use electronic signatures," Jeremy advises. "If you plan right and select a good product, it works out really well, so communication is key."

While you're taking steps to prepare the staff, don't forget to prepare yourself. "Make sure you have your SOPs in place," Neal says. "Make sure you have the validation in place for whichever system that you're using, and make sure that you remember to file your letter of nonrepudiation with the FDA."

Communicate with monitors

When transitioning to eSignatures, it's important to remember that nobody likes surprises. Be sure to let your monitor know prior to their visit. Explain how you have prepared, welcome questions, and take advantage of available resources to provide answers. "Hopefully you have a vendor that can support you." Lisa says.

Request electronic study startup packets

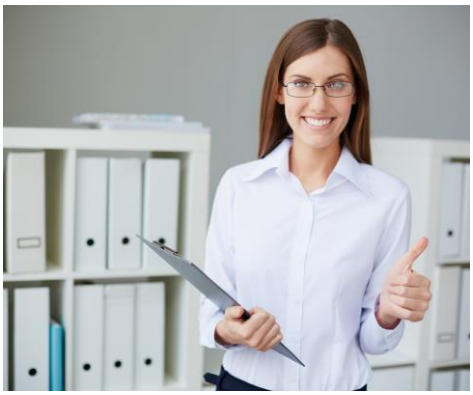
Some sites are still receiving paper regulatory and startup information. Get ahead of the situation and request startup documents in electronic form.

Demonstrate 21 CFR Part 11 compliance

You should also be ready to demonstrate your Part 11 compliance. Here, too, your vendor can help in that effort. "It's something that you want to definitely have on your belt when we're living in the day and age of all of these electronic processes," Lisa explains. "It's best to be armed with the knowledge."

Involve staff early in the process

"Make sure that as you plan for your transition from wet ink to electronic signatures that all your staff know what's coming," Neal says. Set clear and appropriate expectations. "Your coordinators or your regulatory specialists are



DID YOU KNOW?

In addition to the FDA's 21 CFR Part 11 regulation, the November 2016 revisions to ICH GCP E6 (R2) also require sites to validate systems storing electronic documents used for clinical research.

your front line," says Lisa. Get them involved early in the process. Explain the benefits and provide one-one-one training as needed. Lastly, understand that it takes six weeks to develop a new habit, so allow time to adjust.

Identify a project lead

Designate a point person in your organization to respond to questions and concerns, a project manager to lead the project and to help insure that it's moving forward appropriately.

Simplify the process

Finally, take steps to ensure that the signature process is simple and efficient, and that it supports the ability to sign by a smartphone or a tablet.

Applying the suggestions and practices described here will help to smooth the adoption of eSignatures in your organization. Staff and stakeholders will be more willing to end their "familiar suffering," clearing the way to the realization of the considerable benefits.

ABOUT COMPLION

Complion's mission is to reinvent site regulatory and document management by eliminating human error and redundant work to achieve maximum efficiency and compliance. We are the first and are the largest eRegulatory platform built for sites, health systems, academic medical centers, and cancer centers.

Additional Resources

eRegulatory Buyer's Guide

This 38-Point Checklist provides an at-a-glance perspective on functionality, visibility, scalability, ease of use, and other considerations.

Case Study: A Research Site's FDA Inspection with eRegulatory

This case study shares insights into Chesapeake Research Group's (CRG) FDA inspection while using the Complion eRegulatory system.

Facilitating Compliance with ICH GCP E6(R2)

ICH E6 guidelines have been revised to reflect two decades of technological changes. Learn how Complion helps clinical research sites meet new changes.

Complion, Inc.
1621 Euclid Ave, Suite 2150
Cleveland, OH 44115

Ph: 800.615.9077
W: www.complion.com
E: contact@complion.com