

A Day in the Life of a TMF Document

ACT II: Document Creation and Submission



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Meet Your Instructors

Lisa Watson



- Performs TMF QC, Reconciliation, Remediation, CRO TMF QC, Inspection Readiness, FDA Submission.
- Experience with multiple eTMF platforms.
- Collaborate with Sponsors, CROs, vendors and Project Teams
- Involved with Training Development

20 years of experience performing TMF-related tasks while supporting clinical trials

Meet Your Instructors

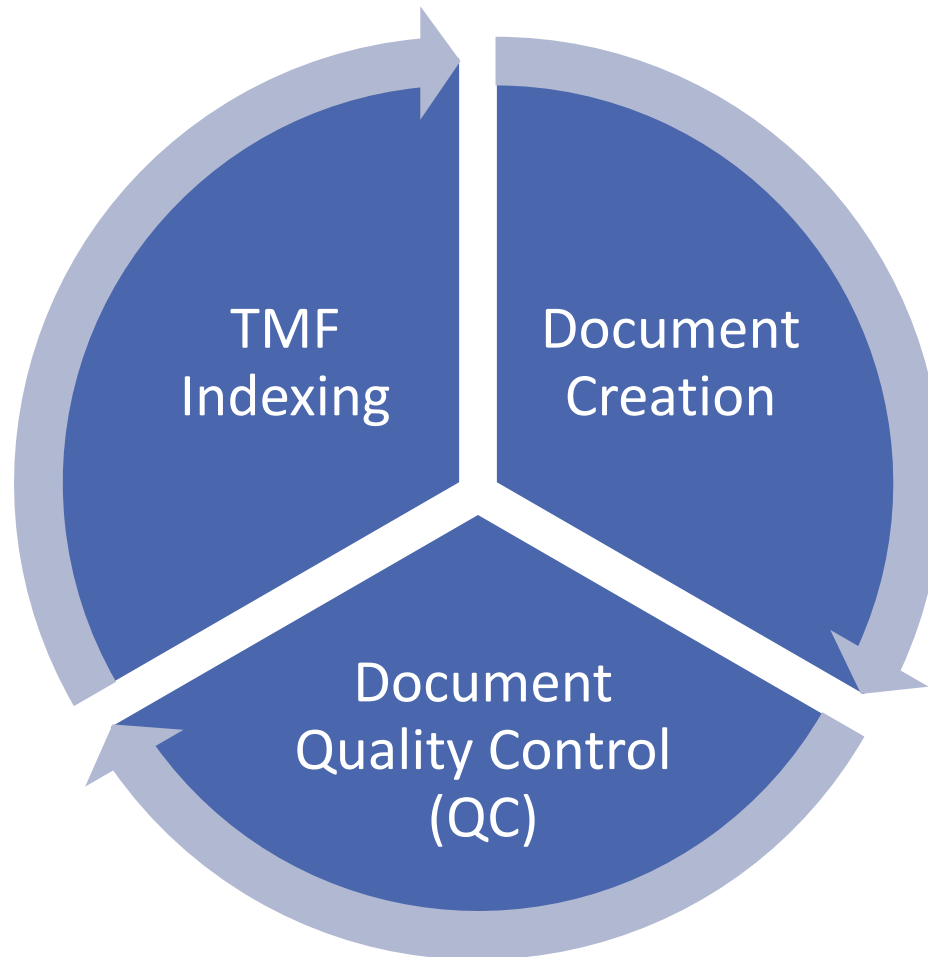
Jackie Morrill



- Dedicated focus on all things related to Trial Master File
- Experience with eTMF implementation, TMF migration projects, metrics and training development, QC process improvement, and extensive inspection readiness preparation

Lean Six Sigma Green Belt certified clinical research professional with 10 years experience in clinical trial coordination and process improvement

Agenda



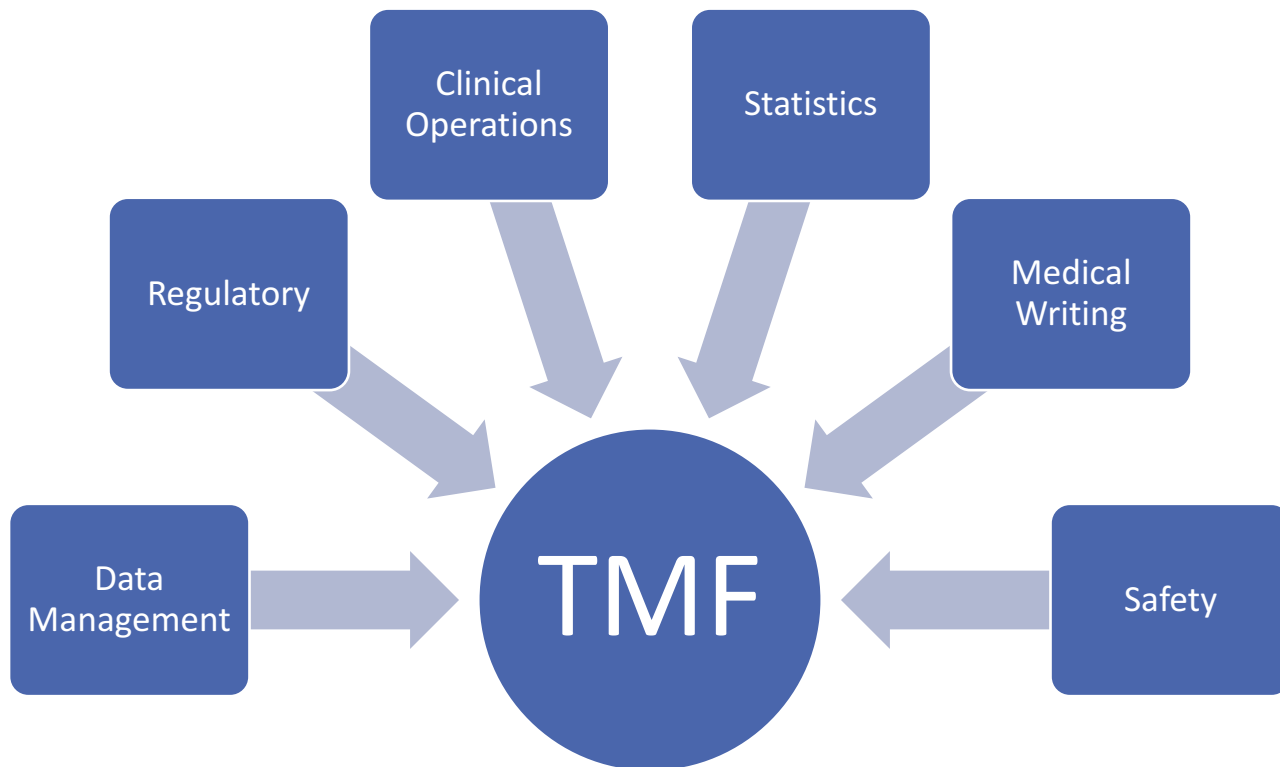
Document Creation

Where do TMF documents originate?



Document Creation

Sponsor



Document Creation

CRO



Performed on behalf of sponsor

Some or all functions may be outsourced

Document Creation *Site*



Generate a majority
of TMF documents

Collected by CRA/
Site Monitor

Document Creation

- Document Creator and Document Submitter may or may not be the same person
- If they are not, Document Creator should perform an initial QC before providing document to the Document Submitter

Quality starts at creation!

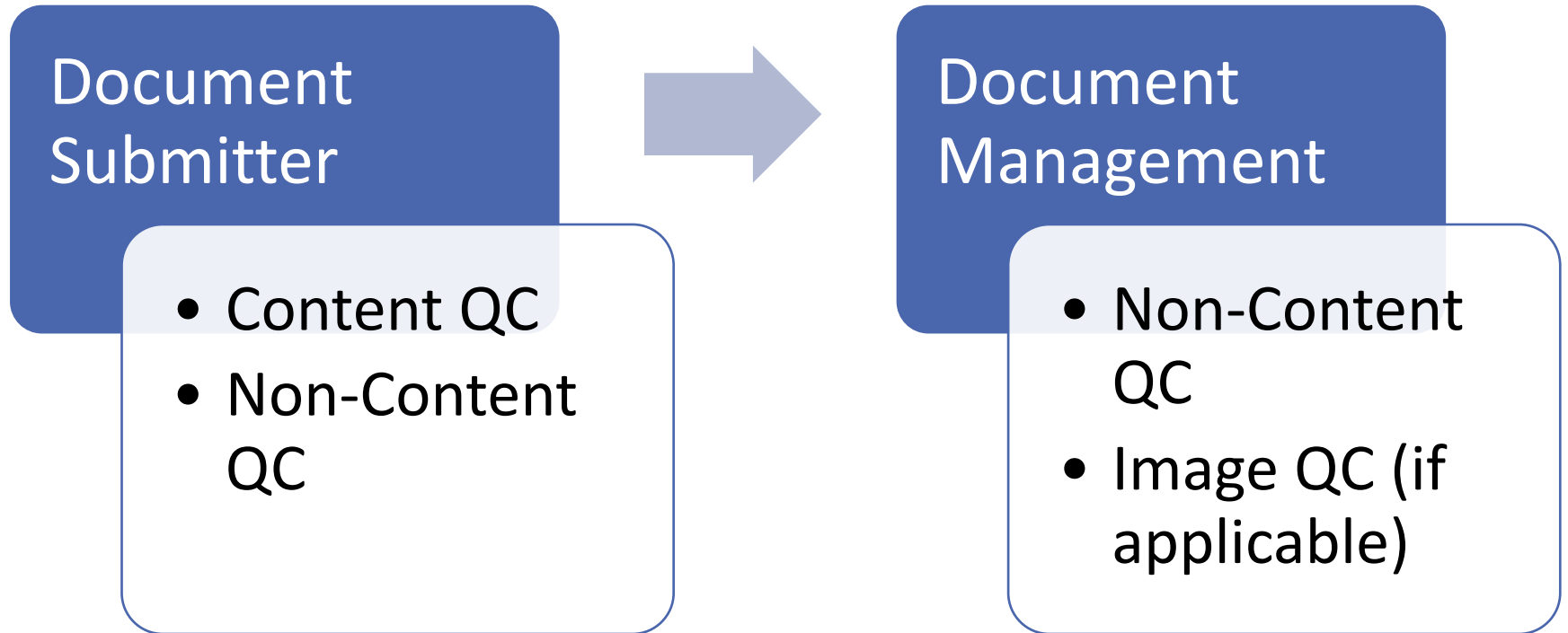
Document Quality Control (QC)

**Are your documents
complete and
accurate prior to
filing them in the
TMF?**

FAIL ☐
PASS ☒



Document QC *Workflow*



Document QC

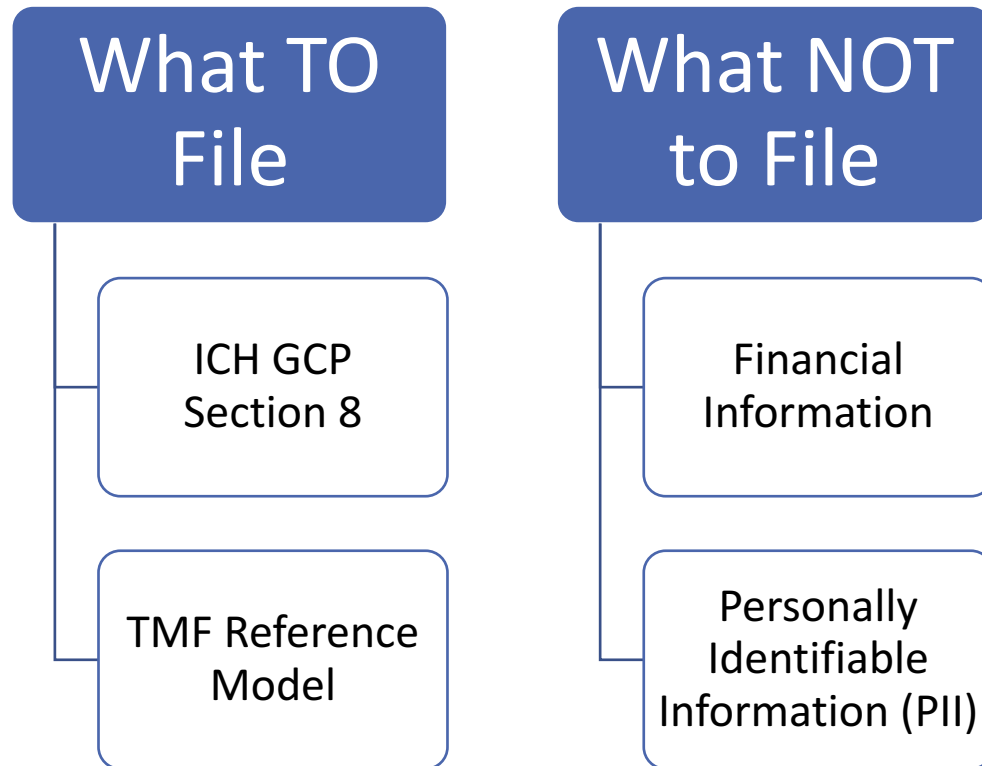
Content QC



- Appropriate for TMF
- Meaningful and relevant to the study
- Utilizes the correct version of the document template (if applicable)

Document QC

Content QC – Appropriate for TMF



Document QC

Content QC – Meaningful to Study

TMF must demonstrate...

Conduct of
the trial

Protection
of subjects'
rights and
safety

Integrity of
trial data

Compliance
with GCP

Document QC

Content QC – Meaningful to Study

To provide unique information about an event that is not documented elsewhere in the TMF and explain the outcome or due diligence.

**When to
use a NTF:**

**When NOT to
use a NTF:**

To state an issue without an explanation of why it occurred, what has been to remedy it and what corrective action is being taken to ensure it does not occur again.

Document QC

Content QC – Relevant to Study

- TMF should not serve as a catch-all for trial documentation
- Documents should directly relate to a single study
 - No references to other studies → inspection risk
- Correspondence should only be filed when it documents a decision, agreement, or significant discussion that is **NOT** documented anywhere else in the TMF

Document QC

Non-Content QC

- ✓ Final – not a draft, no tracked changes
- ✓ Complete – all fields, signatures, dates
 - Signatures that are not required should be marked as Not Applicable
- ✓ Not a duplicate
- ✓ Pages – all present and in sequential order
 - Expected blank pages should be clearly marked
- ✓ Legible – not skewed, text too small, too light, too dark

Document QC


Non-Content QC

- ✓ Study identifiers – present and correct
 - Not expected on certain site documents (CVs, GCP certs, etc.)
- ✓ Version Control
 - Version Number
 - Version Date
- ✓ Header and footers – accurate (if applicable)

Document QC

Non-Content QC

- ✓ Personally Identifiable Information (PII) – completely redacted (if applicable)
- ✓ Handwritten corrections – initialed and dated

SHOULD NOT SEND THIS FORM DIRECTLY TO THE FOOD AND DRUG ADMINISTRATION.	
10. DATE (mm/dd/yyyy) 01-06-2016 2016 01-06-2015	11. SIGNATURE OF INVESTIGATOR  <div>Sign</div>
(WARNING: A willfully false statement is a criminal offense. U.S.C. Title 18, Sec. 1001.)	

- ✓ Translations
 - Original Language
 - Translation Certificate

Document QC

Electronic Documents

Hyperlinks

- Confirm links are functional post-upload

Format

(e.g., Excel, Word, PDF)

- Confirm it is acceptable for the eTMF system to which it will be uploaded

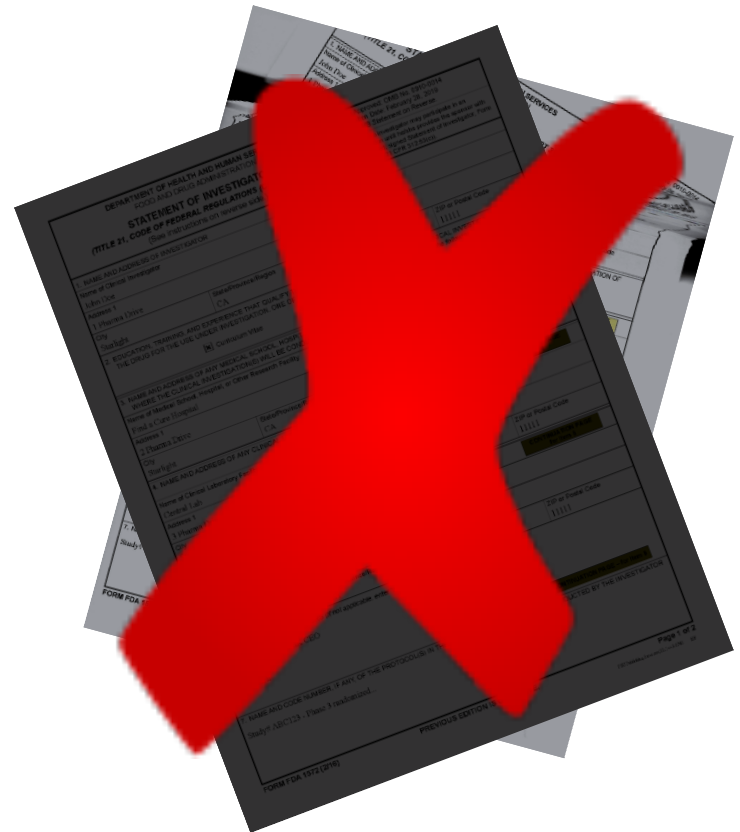
Encryption/ Password Protection

- Confirm the document can be opened post-upload

Document QC

Image QC

- Electronic recreation of a paper document is an exact replica of the original
- Pages are not skewed
- Legible (not too light or dark)
- Clean image (no speckles present)
- All pages are in the proper orientation (landscape vs portrait)



Document QC

Image Adjustments



Increase legibility without
altering the content



Removing or adding
material to the image

TMF Indexing

**How do you ensure
your TMF documents
are filed in the
appropriate TMF
location?**



TMF Indexing

Refer to TMF Index to determine:

WHO is responsible for filing

WHERE to file it



To specify filing location:

Paper documents → Coversheet

Electronic documents → Metadata

TMF Indexing

Location Information

- Document Level (Trial, Country, Site)
- Document Type
- Section and Artifact Name (for TMF Reference Model)

Additional Information

- Document Name
- Document Date
- Version Number (if applicable)
- Expiry Date (if applicable)

TMF Indexing

Naming Conventions

- Must be meaningful and allow you to identify a document without having to open it
- Formal guidance should be developed to ensure consistency
- Should be QC'ed as part of the metadata applied to a document during submission

TMF Indexing

Best Practices – NTFs and Correspondence

DO

- File in section to which it relates

DON'T

- Overuse the “General” sections of TMF Reference Model

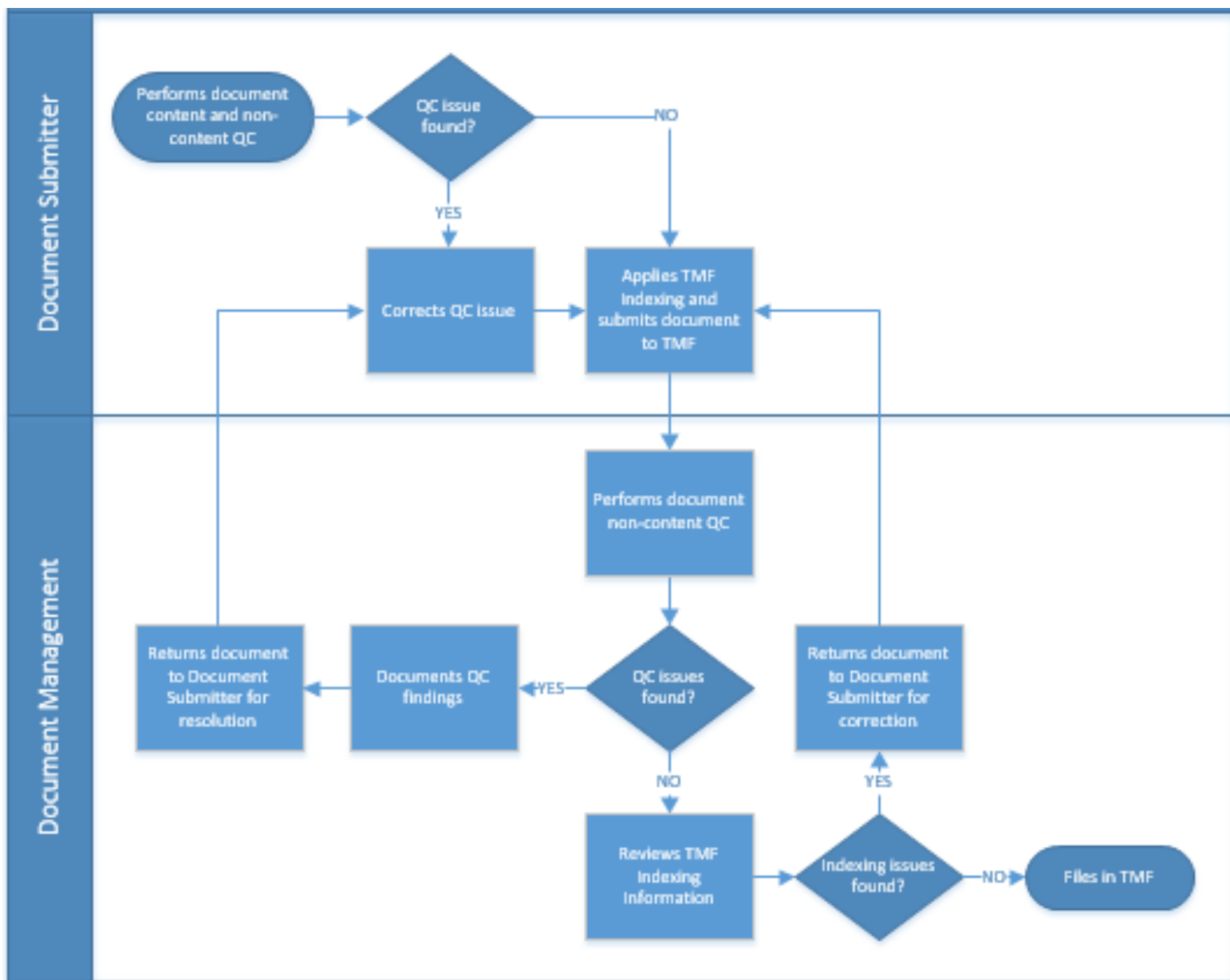
Document Creation

Best Practices – Translations

- File as a package:
 - Full translation in local language
 - Back translation (if required)
 - Translation Certificate
- Original language document may or may not be in package
- Develop formal guidance

Consistency is key!

Complete Workflow



Summary of Training

Document Creation

- Sponsor, CRO and Site may generate documents
- A majority originate at site

Document QC

- All documents must be QC'ed prior to submission
- Recommended to have content and non-content QC

Document Indexing

- TMF index specifies document location
- Indexing information (TOC) should be reviewed as part of submission

Questions?



Thank You!