Einleitung und Fragestellung

All research projects require documentation in such a way that reconstruction of the course of events is possible. In clinical trials, this is equivalent to the definition of "audit trail", stipulated in ICH-GCP. A Trial Master File (TMF) is the collection of essential documents that are used by sponsors, CROs, and investigators for the management of a clinical trial and by monitors, auditors and inspectors to review and verify whether the sponsor and the investigator have conducted the clinical trial in line with the applicable regulatory requirements and the principles and standards of GCP. A new EU Guideline on TMFs (paper or electronic) supplements ICH-GCP requirements and is both, helpful and challenging, when it comes to the practical implementation of a TMF.

Material und Methoden

The presentation will introduce the new Guideline. The structure of a TMF will be addressed and awareness will be raised for proper documentation when planning, conducting, closing and archiving a clinical trial. The TMF must be inspection ready at any timepoint during and after the clinical trial for the entire retention period.

Ergebnisse

Since June 2019, a new EU Guideline on paper and electronic Trial Master File (TMF) is in effect. The Guideline offers clarifications in many aspects. For example, the requirements on electronic TMFs (eTMFs) are clearly stipulated and the essential documents listed in ICH-GCP are supplemented by additional important documents. Emphasis is given to the interface between sponsors and CROs by providing many elements that should be present in either contractual agreements or other documents that describe the cooperation between the parties. Sponsor oversight duties are well explained, so are the responsibilities of investigators. The structure of a TMF is presented by introducing a primary TMF plus other parts of the TMF which belong to central systems. A TMF is clearly following a decentralized structure which poses challenges to all involved parties of a clinical trials. Last but not least, retention of essential documents is covered and requires the archiving of data in such a way that the data are maintained either in the original system, an emulated system or are migrated to a new system. Static data are not acceptable. The TMF must be inspection ready at any timepoint during and after the clinical trial for the entire retention period.

Diskussion

Challenges of the new TMF Guideline will be discussed. What functionality of an electronic system that has been archived is expected by inspectors? What does it mean that the data are to be retained in a dynamic format and...
that a static format is not accepted? Do we have to keep our eSystems (e.g., eCRF, eTMF, ePRO) live for 25 years (the future retention period)?