

## Guidance on the use of VR18 Paperless Recorders for electronic record keeping in FDA approved processes

### Introduction

On August 20th 1997 the Food and Drug Administration made 21 CFR Part 11 effective.

This regulation is summarized as follows:

*"The Food and Drug Administration (FDA) is issuing regulations that provide criteria for acceptance by FDA, under certain circumstances, of electronic records, electronic signatures, and handwritten signatures executed to electronic records as equivalent to paper records and handwritten signatures executed on paper. These regulations, which apply to all FDA program areas, are intended to permit the widest possible use of electronic technology, compatible with FDA's responsibility to promote and protect public health. The use of electronic records as well as their submission to FDA is voluntary."*

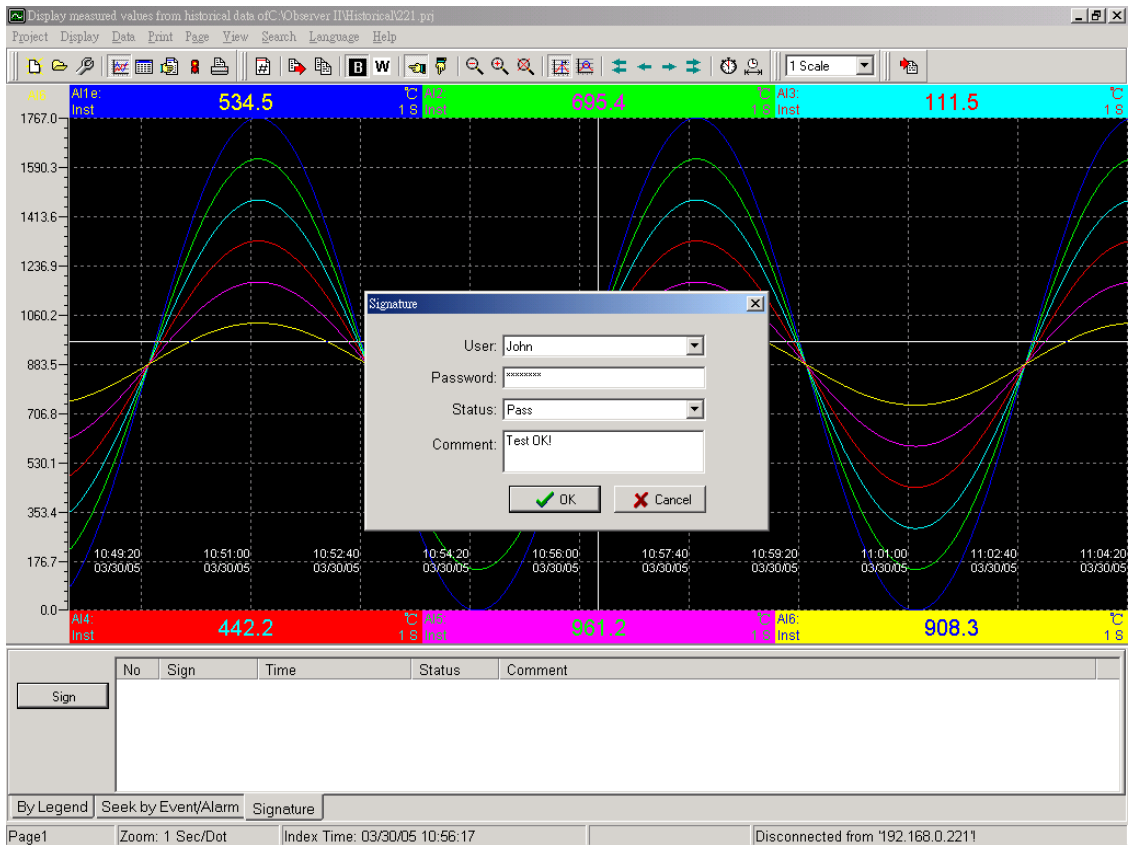
This guide provides details of the relevant sections of CFR21 Part 11 and gives information on how the VR18 paperless recorders can be used to meet these FDA requirements for the creation of electronic records in a closed system.

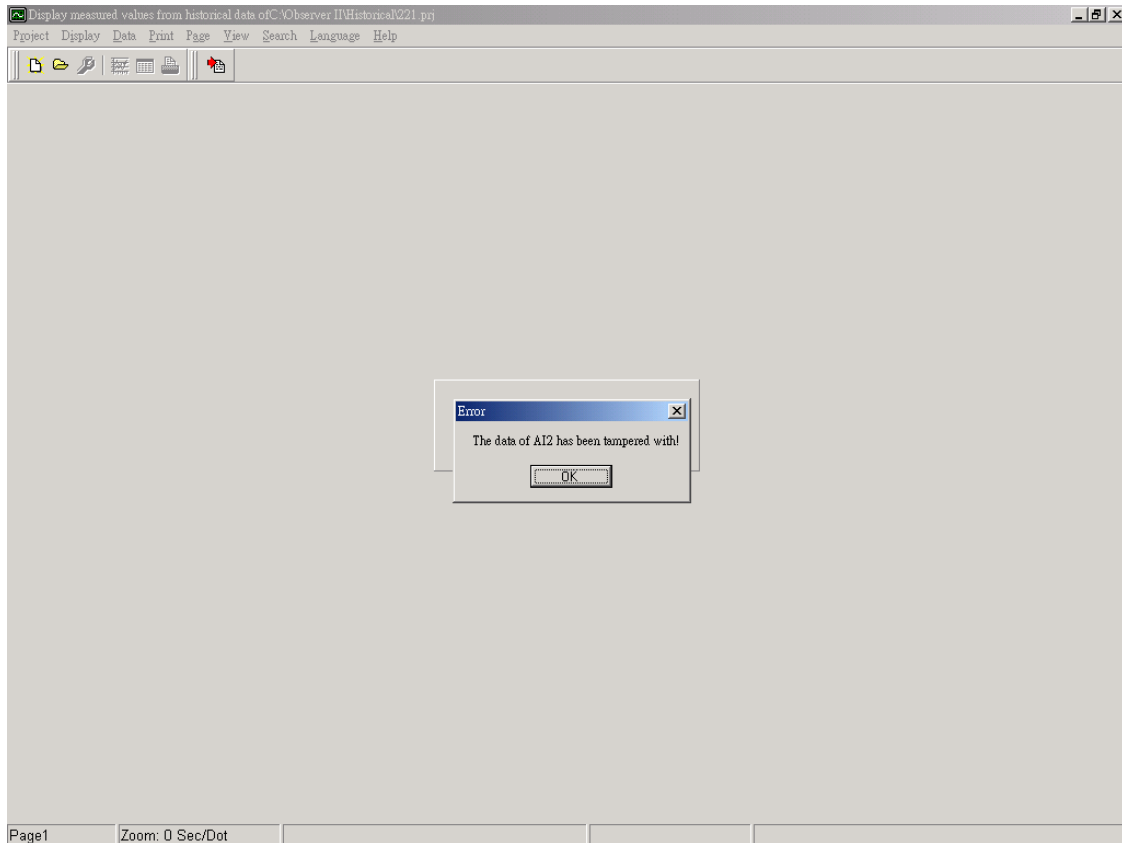


FDA CFR21 Part 11 Subpart B, Section 11.10: Controls for modification.

'Persons who use closed systems to create, modify, maintain, or transmit electronic records shall employ procedures and controls designed to ensure the authenticity, integrity, and when appropriate the confidentiality of electronic records, and can ensure that the signer cannot repudiate the signed record as not genuine.'

All process data recorded by a VR18 paperless recorder are in proprietary (tamperproof) format and read-only from normal operator interface. Via the use of Historical Viewer data review software "digital signature" can be added and checked to validate the integrity of the data. If any part of the data record is changed the Historical Viewer software will warn the user of the invalid nature of the record.

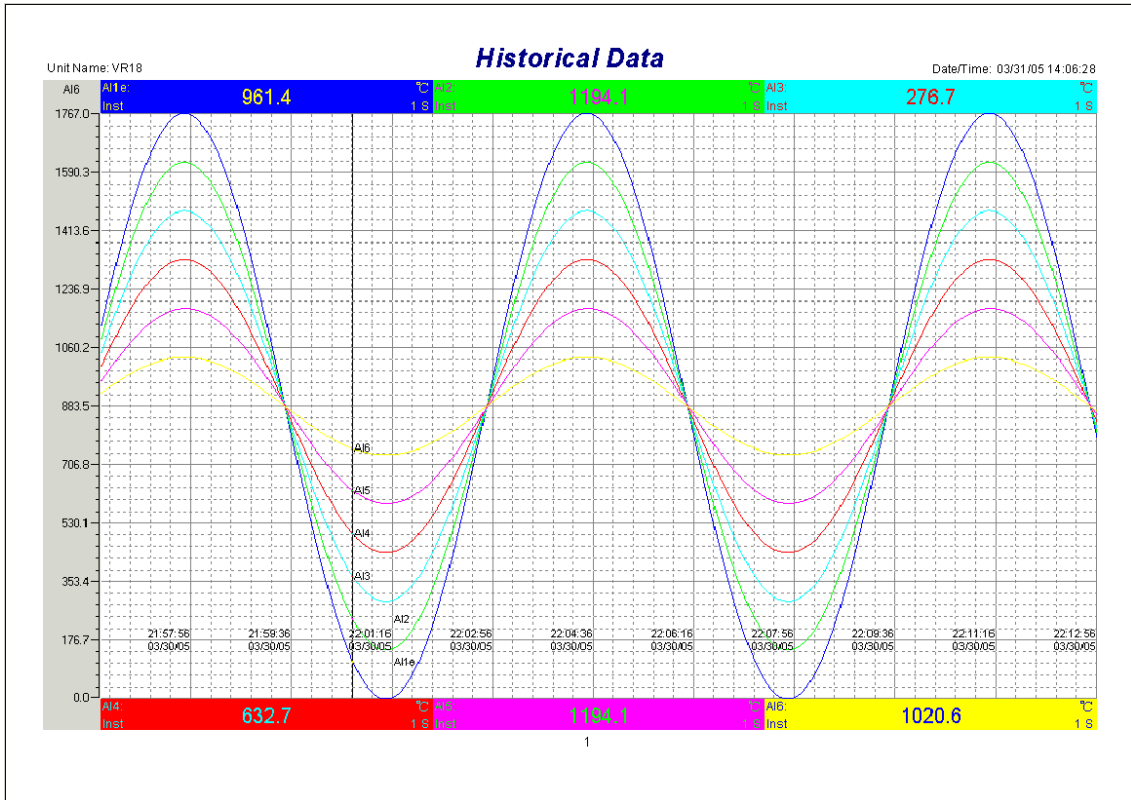




*FDA CFR21 Part 11 Section 11.10 (b)*

*"The ability to generate accurate and complete copies of records in both human readable and electronic form suitable for inspection, review, and copying by the agency (FDA)."*

**The VR18 paperless recorders can create process data files on Compact Flash memory cards. These data files are created from secure records stored in internal flash memory. Error detection algorithms are employed to ensure that the stored data faithfully represents the actual raw measurements made by the recorder. Each write to the archive media is also verified to ensure the integrity of the data record. The archived process data files can be viewed using the Historical Viewer review software. The data can be viewed and printed in graphical formats. Standard spreadsheet formats (e.g. Microsoft Excel) of the archived data files can be created for viewing by users who do not have the review software.**



Display measured values from historical data of C:\Observer II\Historical\221.pn

Project Display Data Print Page View Search Language Help

AI1: 534.5    AI2: 695.4    AI3: 111.5

AI4: 442.2    AI5: 961.2    AI6: 908.3

Export

Files

Pen file: C:\221\_Pen.csv

Event file: C:\221\_Event.csv

OK Cancel

No	Sign	Time	Status	Comment
Sign				

By Legend    Seek by Event/Alarm    Signature

Page1    Zoom: 1 Sec/Dot    Index Time: 03/30/05 10:56:17    Disconnected from '192.168.0.221'

	A	B	C	D	E	F	G	H	I	J	K	L	M
1	Date/Time	AI1	AI10	AI11	AI12	AI13	AI14	AI15	AI16	AI17	AI18	AI2	AI3
2		Instant	Instant	Instant	Instant	Instant	Instant	Instant	Instant	Instant	Instant	Instant	Instant
3		°C	°F	°F	°F	%	%	%	%	%	%	°C	°C
4	2005/3/28 13:24	433	1198.4	2211.6	1886	99.2	82.8	66.4	33.6	17.2	0.8	576.9	72.3
5	2005/3/28 13:24	415.4	1189.4	2200.7	1880.7	97.2	81.46	65.73	34.26	18.53	2.8	556.3	65.5
6	2005/3/28 13:24	397.9	1180.4	2189.7	1875.4	95.2	80.13	65.06	34.93	19.86	4.8	535.8	58.7
7	2005/3/28 13:24	380.4	1171.4	2178.8	1870.1	93.2	78.8	64.4	35.6	21.2	6.8	515.3	51.9
8	2005/3/28 13:24	362.9	1162.4	2167.9	1864.8	91.2	77.46	63.73	36.26	22.53	8.8	494.9	45.1
9	2005/3/28 13:24	345.5	1153.4	2157	1859.5	89.2	76.13	63.06	36.93	23.86	10.8	474.6	38.4
10	2005/3/28 13:24	328.2	1144.4	2146.1	1854.2	87.2	74.8	62.4	37.6	25.2	12.8	454.4	31.7
11	2005/3/28 13:24	311	1135.4	2135.1	1848.9	85.2	73.46	61.73	38.26	26.53	14.8	434.4	25.0
12	2005/3/28 13:24	294	1126.4	2124.2	1843.6	83.2	72.13	61.06	38.93	27.86	16.8	414.4	18.3
13	2005/3/28 13:24	277.1	1117.4	2113.3	1838.3	81.2	70.8	60.4	39.6	29.2	18.8	394.7	11.6
14	2005/3/28 13:24	260.3	1108.4	2102.4	1833	79.2	69.46	59.73	40.26	30.53	20.8	375.1	5.0
15	2005/3/28 13:24	243.8	1099.4	2091.5	1827.7	77.2	68.13	59.06	40.93	31.86	22.8	355.8	-1.7
16	2005/3/28 13:25	227.4	1090.4	2080.5	1822.4	75.2	66.8	58.4	41.6	33.2	24.8	336.6	-7.0
17	2005/3/28 13:25	211.2	1081.4	2069.6	1817.1	73.2	65.46	57.73	42.26	34.53	26.8	317.7	-13.0
18	2005/3/28 13:25	195.3	1072.4	2058.7	1811.7	71.2	64.13	57.06	42.93	35.86	28.8	299.1	-19.7
19	2005/3/28 13:25	179.6	1063.4	2047.8	1806.4	69.2	62.8	56.4	43.6	37.2	30.8	280.8	-25.8
20	2005/3/28 13:25	164.1	1054.4	2036.9	1801.1	67.2	61.46	55.73	44.26	38.53	32.8	262.7	-31.8
21	2005/3/28 13:25	148.9	1045.4	2025.9	1795.8	65.2	60.13	55.06	44.93	39.86	34.8	245	-37.6
22	2005/3/28 13:25	134.1	1036.4	2015	1790.5	63.2	58.8	54.4	45.6	41.2	36.8	227.6	-43.4
23	2005/3/28 13:25	119.5	1027.4	2004.1	1785.2	61.2	57.46	53.73	46.26	42.53	38.8	210.6	-49.0
24	2005/3/28 13:25	105.2	1018.4	1993.2	1779.9	59.2	56.13	53.06	46.93	43.86	40.8	193.9	-54.6
25	2005/3/28 13:25	91.3	1009.4	1982.3	1774.6	57.2	54.8	52.4	47.6	45.2	42.8	177.6	-60.0
26	2005/3/28 13:25	77.7	1000.4	1971.3	1769.3	55.2	53.46	51.73	48.26	46.53	44.8	161.8	-65.2
27	2005/3/28 13:25	64.4	991.4	1960.4	1764	53.2	52.13	51.06	48.93	47.86	46.8	146.3	-70.3
28	2005/3/28 13:25	51.6	982.4	1949.5	1758.7	51.2	50.8	50.4	49.6	49.2	48.8	131.3	-75.3
29	2005/3/28 13:25	39.1	973.4	1938.6	1753.4	49.2	49.46	49.73	50.26	50.53	50.8	116.7	-80.3
30	2005/3/28 13:25	27	964.4	1927.7	1748.1	47.2	48.13	49.06	50.93	51.86	52.8	102.6	-84.3

**FDA CFR21 Part 11 Section 11.10 (c)**







*“Protection of records to enable their accurate and ready retrieval throughout the records retention period.”*

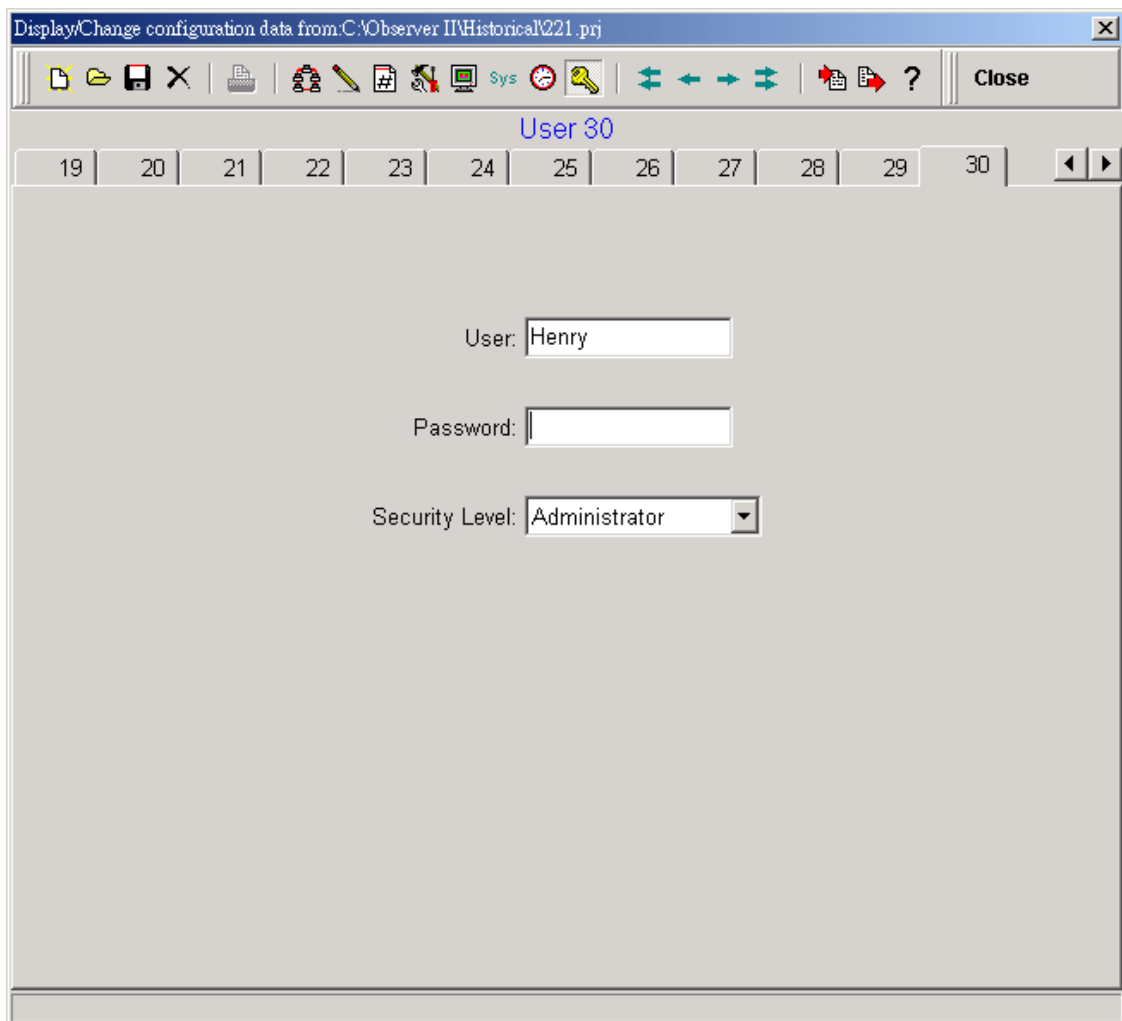
The VR18 paperless recorders use solid state flash memory, for data storage, in the form of Compact Flash cards. Data retention for this device is specified at a minimum of 10 years. It provides Zero power data retention i.e. the data integrity is not dependent on battery back-up. The data is not affected by magnetic fields. For even longer term data storage the archive files can be copied to CDROM or to a network file server.

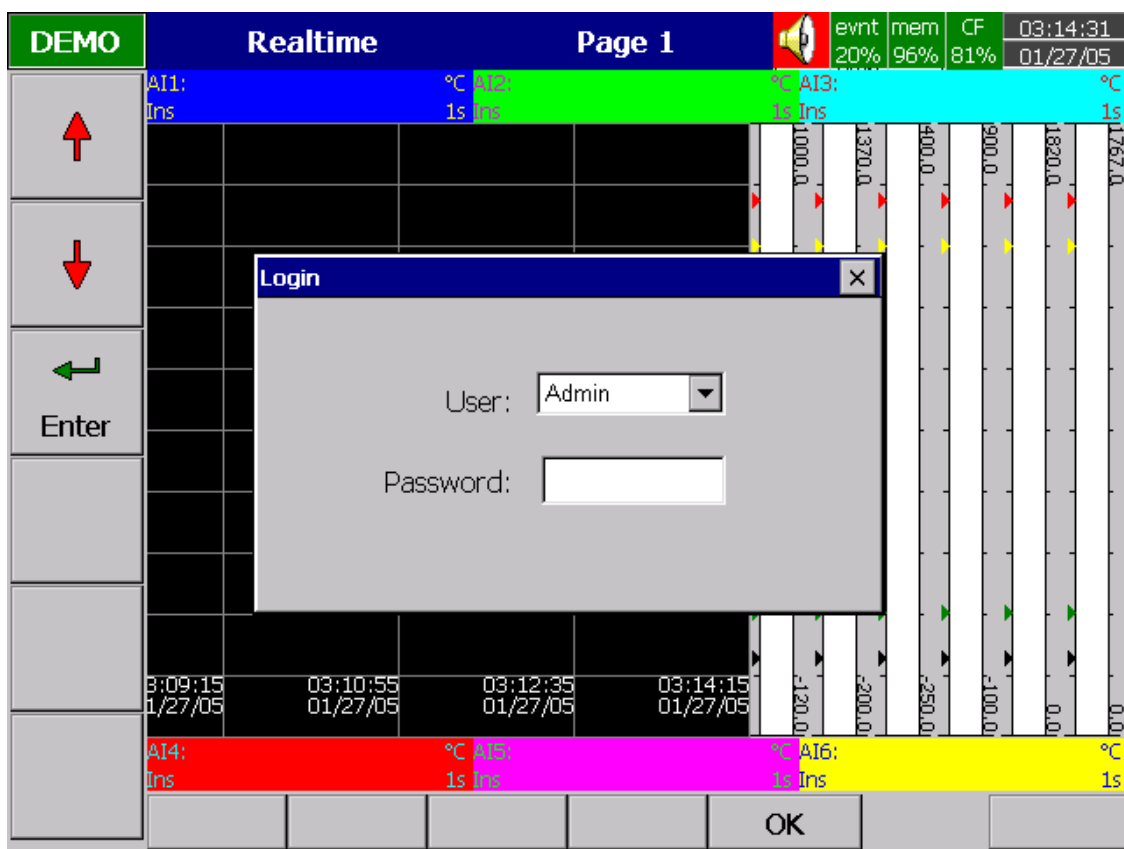
**FDA CFR21 Part 11 Section 11.10 (d)**

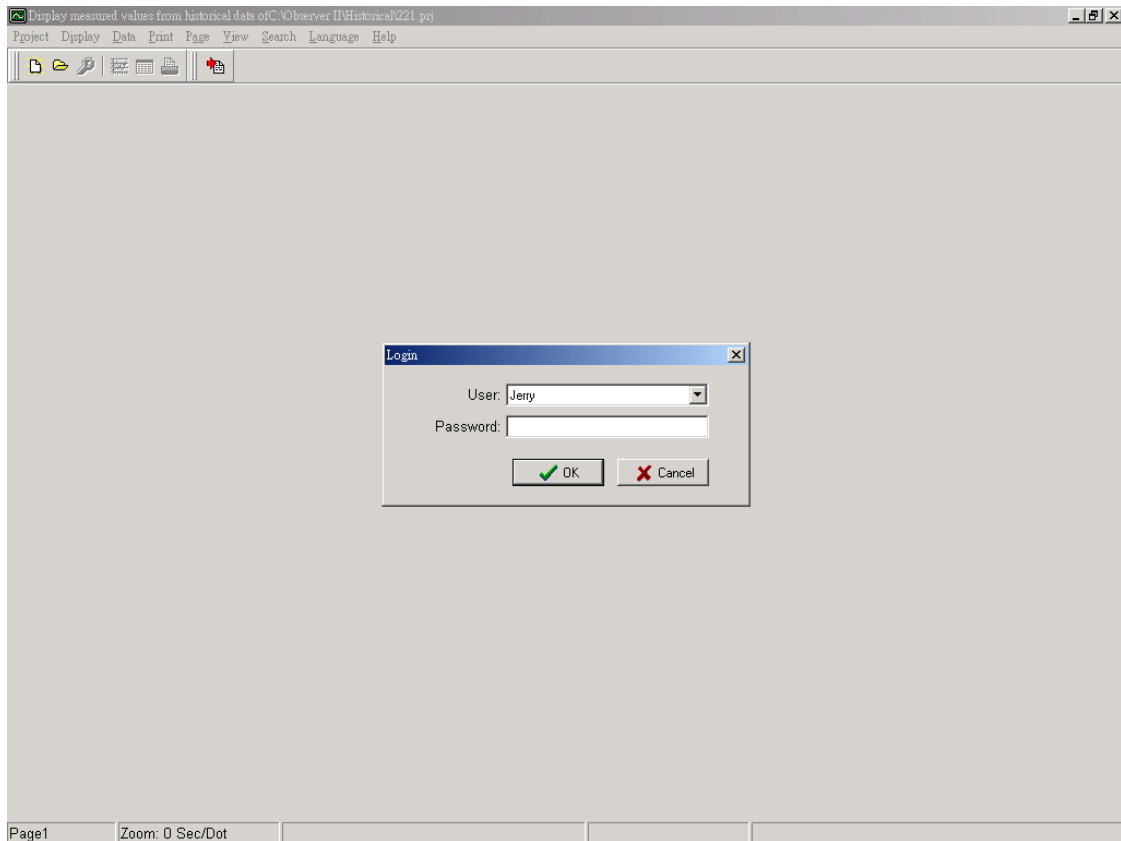
*“Limiting system access to authorized individuals.”*

The VR18 paperless recorders provide the ability to limit access to the instruments configuration and critical operator functions. For each user a unique id and password can be created for access to the configuration parameters. The id and password can be alphanumeric and up to 8 characters in length. In order to gain access to the configuration parameters, a valid operator id and password combination have to be entered. Any modification of the instruments configuration is recorded in the audit log identifying the user responsible for the change. VR18 will logout automatically after a period of inactivity.

<b>DEMO</b>	<b>Security</b>		<b>User30</b>			evnt	mem	CF	03:20:08
						13%	96%	81%	01/27/05
     Enter	21 22 23 24 25 26 27 28 29 30								
	User: <input type="text" value="Henry"/>								
	Password: <input type="password"/>								
	Security Level: <input type="text" value="Administrator"/>								
								Back	







*FDA CFR21 Part 11 Section 11.10 (e)*

*"Use of secure, computer-generated, time-stamped audit trails to independently record the date and time of operator actions that create, modify, or delete electronic records. Record changes shall not obscure previously recorded information. Such audit trail documentation shall be retained at least as long as that required for the subject electronic records and shall be available for agency review and copying."*

**The VR18 paperless recorders automatically produce a time stamped audit trail that includes power failure and recovery, configuration changes, data dumping and clearing, critical operator functions. This information is stored in an audit log which can be archived to a permanent file on Compact flash. A separate alarm/event log automatically produces a time stamped record of all alarm state changes and can also be archived to a permanent file.**



Ack	Type	Source	Active Time	Clear Time	Value
1	NetDump	Admin	03/29/05 15:41:18		
2	<input type="checkbox"/> HiAlarm	AI1e	03/29/05 15:41:19	Terminated	945.9
3	<input type="checkbox"/> HiHiAlarm	AI1e	03/29/05 15:41:19	Terminated	945.9
4	<input type="checkbox"/> HiAlarm	AI2	03/29/05 15:41:19	Terminated	1176.0
5	<input type="checkbox"/> HiHiAlarm	AI2	03/29/05 15:41:19	Terminated	1176.0
6	<input type="checkbox"/> HiAlarm	AI3	03/29/05 15:41:19	Terminated	270.7
7	<input type="checkbox"/> HiAlarm	AI13	03/29/05 15:41:28	Terminated	80.80
8	<input type="checkbox"/> LoAlarm	AI18	03/29/05 15:41:28	Terminated	19.20
9	<input type="checkbox"/> HiHiAlarm	AI13	03/29/05 15:41:35	Terminated	87.80
10	<input type="checkbox"/> LoLoAlarm	AI18	03/29/05 15:41:35	Terminated	12.20
11	<input type="checkbox"/> HiAlarm	AI14	03/29/05 15:41:43	Terminated	80.53
12	<input type="checkbox"/> LoAlarm	AI17	03/29/05 15:41:43	Terminated	19.47
13	<input type="checkbox"/> HiAlarm	AI7	03/29/05 15:42:48	Terminated	1436.9
14	<input type="checkbox"/> HiAlarm	AI8	03/29/05 15:43:00	Terminated	1942.2
15	<input type="checkbox"/> HiHiAlarm	AI7	03/29/05 15:43:03	Terminated	1588.1
16	<input type="checkbox"/> HiHiAlarm	AI8	03/29/05 15:43:18	Terminated	2154.2
17	<input type="checkbox"/> HiAlarm	AI9	03/29/05 15:43:18	Terminated	521.1
18	<input type="checkbox"/> LoAlarm	AI1e	03/29/05 15:44:09	Terminated	98.3
19	<input type="checkbox"/> LoAlarm	AI2	03/29/05 15:44:19	Terminated	109.7
20	<input type="checkbox"/> LoLoAlarm	AI1e	03/29/05 15:44:22	Terminated	15.4
21	<input type="checkbox"/> LoLoAlarm	AI2	03/29/05 15:44:39	Terminated	-6.0
22	<input type="checkbox"/> LoAlarm	AI3	03/29/05 15:44:39	Terminated	-120.7
23	<input type="checkbox"/> LoAlarm	AI13	03/29/05 15:44:48	Terminated	19.20
24	<input type="checkbox"/> HiAlarm	AI18	03/29/05 15:44:48	Terminated	80.80
25	<input type="checkbox"/> LoLoAlarm	AI13	03/29/05 15:44:55	Terminated	12.20
26	<input type="checkbox"/> HiHiAlarm	AI18	03/29/05 15:44:55	Terminated	87.80
27	<input type="checkbox"/> LoAlarm	AI14	03/29/05 15:45:03	Terminated	19.47
28	<input type="checkbox"/> HiAlarm	AI17	03/29/05 15:45:03	Terminated	80.53
29	<input type="checkbox"/> LoAlarm	AI7	03/29/05 15:46:08	Terminated	211.1
30	<input type="checkbox"/> LoAlarm	AI8	03/29/05 15:46:20	Terminated	227.8
31	<input type="checkbox"/> LoLoAlarm	AI7	03/29/05 15:46:23	Terminated	59.9
32	<input type="checkbox"/> LoLoAlarm	AI8	03/29/05 15:46:38	Terminated	15.8
33	<input type="checkbox"/> LoAlarm	AI9	03/29/05 15:46:38	Terminated	-187.1
34	NetLogout	Admin	03/29/05 15:49:26		
35	NetLogin	Admin	03/29/05 15:49:33		
36	NetLogout	Admin	03/29/05 15:49:49		
37	NetLogin	Admin	03/29/05 15:50:24		
38	NetLogout	Admin	03/29/05 15:50:44		
39	NetLogin	Admin	03/29/05 15:54:34		
40	NetLogout	Admin	03/29/05 15:55:29		

**FDA CFR21 Part 11 Section 11.10 (g)**

*“Use of authority checks to ensure that only authorized individuals can use the system, electronically sign a record, access the operation or computer system input or output device, alter a record, or perform the operation at hand.”*

**The recorders security system outlined in part d) limits access to the system to modify any configuration parameters.**

**FDA CFR21 Part 11 Section 11.10 (h)**

*“Use of device (e.g., terminal) checks to determine, as appropriate, the validity of the source of data input or operational instruction.*

**System errors and input channel status are logged**

**FDA CFR21 Part 11 Section 11.10 (i)**

*“Determination that the persons who develop, maintain, or use electronic record/electronic signature systems have the education, training and experience to perform their assigned tasks.”*

**Only suitably qualified people are employed in product design & development and their training is updated to meet advances in technology.**

**FDA CFR21 Part 11 Section 11.10 (k)**

*“Use of appropriate controls over systems documentation including:*

*(1) Adequate controls over the distribution of, access to, and use of documentation for system operation and maintenance.*

*(2) Revision and change control procedures to maintain an audit trail that documents time-sequenced development and modification of systems documentation.”*

**A design control system is used which is fully documented and traceable. Documentation is provided for installation, configuration and operation in the instruments User Guide.**

#### **Summary**

**The VR18 Paperless Recorders have been designed to meet the standards set out in 21 CFR part 11 and properly implemented they can be used as part of a validated system.**

- 1) All process data recorded by a VR18 Paperless Recorders is protected by an Encrypted “Digital Signature” to ensure the authenticity of these records.**
- 2) Solid state flash memory is used to provide secure storage of data that is not reliant on battery back-up and which is not subject to magnetic fields.**
- 3) Historical Viewer review software provides the ability to view the data records and audit trails in a human readable form.**
- 4) User id and Password are provided in the recorders to limit access to authorized personnel.**
- 5) A detailed audit log accompanies all process data recorded by a VR18 Paperless Recorder. All system events including configuration changes, power failures are logged. All entries are time and date stamped and include an operator id.**