24th January 2022

General Meeting

24th January 2022
Agenda

- TMF Reference Model Community
- Steering Committee Elections
- www.tmfrefmodel.com
- TMF Plan template
- CDISC Position Paper
- ICMRA Reflection Paper: Remote GCP and GMP inspections
- Inspection Panel w/Q&A
- Upcoming TMF Meetings
- Next TMF RM Meeting
The TMF Reference Model Community

Linked In Community
N = 3928

Subscription Members
N = 1517

Active Members
N = 329

Steering Committee
N = 13 (1 vacancy)
Karen Roy, Phlexglobal, Chairperson of SC, Co–chair of the TMF RM
Lisa Mulcahy, Mulcahy Consulting – Co–chair of the TMF RM
Allison Varjavandi, Astellas, Meeting secretary
Mary Emanoil, Pfizer
Jamie Toth, Beigene
Fran Ross, Advanced Clinical
Kathy Clark, Ennov
Todd Tullis, Veeva
Paul Fenton, Montrium
Russell Joyce, Heath Barrowcliff Consulting (Resigning)
Donna Dorozinsky, Just in Time GCP
Joanne Malia, Regeneron
Gillian Gittens, TransPerfect
How do you get on the Steering Committee?

- Steering Committee Members serve a three-year term and we have elections each March / April
- We have 5 vacancies available for election or re-election
- You must have been part of the TMF Reference Model for the past 12 months i.e. registered on groups.io and participating in a project team.
- The Committee meets by phone conferencing every two weeks for an hour and you should try to attend as many of these meetings as possible. Committee members are required to attend at least 50% of the scheduled meetings. And you must love TMFs!!
- You will need to submit a 150-word self-nomination – email will follow to everyone on Groups.IO

Committee Rules:

- No stakeholder groups must be represented by more than 50% of the Steering Committee positions (Sponsor, CRO, Vendor, Consultant)
- The Steering Committee must not comprise over 90% of members from a single geographic region (Americas, Europe, Asia-Pacific)
Trial Master File Reference Model

The Future of the TMF Reference Model

Karen Roy
The TMF Reference Model Steering Committee has authored a position paper which outlines the future direction that it feels the TMF Reference model should head in, its reasoning for affiliating to a more formal organisation and the subsequent proposition to affiliate with CDISC.

Position paper released 19\textsuperscript{th} January – You can access a copy of the position paper [here](#)
Available for comments until 9\textsuperscript{th} February
Email cdisc@tmfrefmodel.com with comments or questions

TMF RM Steering Committee will meet in early March 2022 to ratify decision based on feedback

Implementation plan agreed by end March 2022
CDISC’s Mission: To develop and support global, platform-independent data standards that enable information system interoperability to improve medical research and related areas of healthcare

- Global Non-profit Consensus-based Standards Development Organization
- 20+ Years of Regulatory Clinical Data Standards Development and Implementation
- Experienced Leadership Team and Dedicated Staff of 40+ Professionals and SMEs
- Volunteer Network of 1000+ Industry Experts
- 500+ Member Organizations
Who is CDISC?

- Regulatory Required, Widely Adopted and Freely Available Clinical Research Data Standards
- Mature Standard Governance Processes
- Innovative Open-Source Technology for Standards Library and Metadata Management
- Involved in a wide range of emerging Industry Initiatives and Projects
- Collaborative Ecosystem of Relationships and Partnerships
  - Members, Regulators, Patient Foundations, Academia, SDOs and Industry
What do they offer

- Formal recognition as a Standards Development Organization by Regulatory Agencies (FDA, PMDA, NMPA, EMA)
- A formalized framework for a Standards Development Lifecycle
- Dedicated resources for the management and promotion of Standards
- Technical resources to manage and deploy Standards
- Publication and distribution of Standards documentation and implementation guides
- Formalized Training and Certification on the CDISC Standards
- Dedicated Staff for Events, Education, Membership and Volunteers
What would this mean for the TMF RM

- We would continue to leverage the community to drive the content and direction of the model
- We would still have a steering committee to govern the model
- We would be part of a formal organization with funding and resources
- We would be better enabled to expand the model (definition of metadata, mapping to other models and standards etc.)
- We would be able to leverage CDISC experience in promoting the use and further development of the eTMF exchange mechanism standard
- We would be part of an organization with formal ties to ICH and the Regulatory Agencies
- We would be part of a clinical standards ecosystem with better interoperability
Home

Welcome to the website of the TMF Reference Model. The TMF Reference Model was developed under the auspices of the Drug Information Association (DIA) Document and Records Management Community.

The TMF Reference Model provides standardized taxonomy and metadata and outlines a reference definition of TMF content using standard nomenclature. The Model is not intended to be taken and used “off-the-shelf” but can be adapted to an electronic or paper TMF, and does not endorse, nor require, any specific technology for application. DIA members and industry members are under no obligation to adopt the TMF Reference Model.

Edit

RECENT DISCUSSION TOPICS

- FDA Submission Package
  2 weeks, 2 days ago
- Next TMF Reference Model Meeting (December 2021)
  1 month, 2 weeks ago
- Contemporaneous Timeline Question
  2 weeks, 2 days ago
- Evidence of training – trial team and site staff
  3 months ago
- IP Regulatory Release documentation example request
  3 months, 1 week ago

NEXT GENERAL MEETINGS

Click on a date below to download an Outlook Calendar .ics file:
The TMF Plan Template went live ~4 years ago!
A group of about 12 of us across industry worked on its creation.
We have held 4 workshops about it.
It's time to take a look at what needs to change!
If you are interested in joining the group, send email to Jamie.Toth@beigene.com
ICMRA Remote Inspection
Reflection Paper

Fran Ross impressions
24JAN2022

Personal, not corporate opinions
1. Upon which continent do you reside?

<table>
<thead>
<tr>
<th>Continent</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Asia</td>
<td>2%</td>
</tr>
<tr>
<td>Europe</td>
<td>34%</td>
</tr>
<tr>
<td>Africa</td>
<td>1%</td>
</tr>
<tr>
<td>North America</td>
<td>73%</td>
</tr>
<tr>
<td>South America</td>
<td>0%</td>
</tr>
<tr>
<td>Australia/Antarctica</td>
<td>0%</td>
</tr>
</tbody>
</table>

2. What role do you play?

<table>
<thead>
<tr>
<th>Role</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>cClinical vendor/ consultant</td>
<td>29%</td>
</tr>
<tr>
<td>Trial Participant</td>
<td>1%</td>
</tr>
<tr>
<td>Trial Site</td>
<td>1%</td>
</tr>
<tr>
<td>Trial Sponsor</td>
<td>40%</td>
</tr>
<tr>
<td>Trial CBO (and other trial-vendors)</td>
<td>19%</td>
</tr>
<tr>
<td>Health Authority</td>
<td>0%</td>
</tr>
<tr>
<td>Other - enter in the chat</td>
<td>1%</td>
</tr>
</tbody>
</table>
ICMRA Remote Inspection Paper

- ICMRA Covid–19 Working Group
  - International Coalition of Medicines Regulatory Authorities

- Remote Inspection Reflection Paper
  - "Reflections on the regulatory experience of remote approaches to GCP and GMP regulatory oversight during the COVID–19 Pandemic"

- Final version 1.0 26 Nov 21
Paper Quotes = Overview

During the COVID-19 pandemic, international regulatory authorities adapted their inspection approaches to ensure regulatory oversight of GxP activities.

Due to restrictions to protect public health, regulatory authorities utilised digital technologies, such as video conferencing software and devices to enable continuity of compliance oversight.

The …COVID-19 group set up this working group…

The working group was chaired by MHRA and had had representatives from US–FDA, EMA, Health Canada, Swissmedic, HPRA Ireland, AEMPS Spain, ANSM France, PEI Germany, MHLW/PMDA Japan, TGA Australia, ANVISA Brazil, HSA Singapore, WHO and Saudi–FDA

…to review the adaptation of both GCP and GMP inspections during the COVID-19 pandemic to remote approaches.”
While the ICMRA group have found remote inspections an enabling tool to maintain at least a minimal regulatory oversight during the pandemic…. 

...it is not the view of the group that remote inspections would fully replace an on-site inspection programme.

....Notable limitations, with current available technological means, have been identified during the experience with the use of remote assessment of regulatory compliance and are described in the relevant subsections.

Of additional interest – no notable differences in inspection results
ICMRA Remote Inspections Reflection Paper

FR paraphrased from Paper = Notable Limitations

- As yet, no remote best practices, no one-size fits all

- Remote inspections take more time
  - More time to HA plan, more time to inspectee activate, more time to complete

- Remote inspections obviate any element of surprise
  - Not possible to just show up at the facility if inspector needs to “dial in”

- Video conferences are the worst best
  - not proving viable for GMP facility inspection
  - not helpful for reading the room
  - very difficult method to facilitate any inspectee systems access
ICMRA Remote Inspections Reflection Paper

Advice for eTMFs?

- Practice, dry run, work with experts
  - Plan for the worst, expect the best
  - Try a remote MHRA mock inspection and an FDA mock inspection

- Remote inspections results no better, no worse, so....
  - Push the teams to timely post eTMF records
  - Check and correct that TMF records are consistently ALCOAC
  - Work with trial leads to get the TMF complete

- Remember – it is GCP, it is not PCP
  - It’s GOOD (not perfect) CLINICAL PRACTICE
  - Take a risk-based approach to inspection surety

- And now------Q&A and panel
1. From the start of COVID-19 lockdown (~2019+) - Has your company experienced a remote Health Authority inspection? (Multiple choice)

<table>
<thead>
<tr>
<th>Option</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>No</td>
<td>44%</td>
</tr>
<tr>
<td>Yes MI-RA</td>
<td>10%</td>
</tr>
<tr>
<td>Yes EMA</td>
<td>7%</td>
</tr>
<tr>
<td>Yes FDA</td>
<td>10%</td>
</tr>
<tr>
<td>Yes PMDA</td>
<td>9%</td>
</tr>
<tr>
<td>Yes Other (add in comments)</td>
<td>3%</td>
</tr>
<tr>
<td>Not applicable to me</td>
<td>30%</td>
</tr>
</tbody>
</table>

2. From the start of COVID-19 lockdown (~2019+) - Has your company experienced a remote Internal/Vendor audit?

<table>
<thead>
<tr>
<th>Option</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>44%</td>
</tr>
<tr>
<td>No</td>
<td>24%</td>
</tr>
<tr>
<td>Not applicable to me</td>
<td>31%</td>
</tr>
</tbody>
</table>

3. Do you anticipate/actively planning for a Health Authority remote or live inspection this year (in 2022)?

<table>
<thead>
<tr>
<th>Option</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
<td>40%</td>
</tr>
<tr>
<td>No</td>
<td>26%</td>
</tr>
<tr>
<td>Not applicable to me</td>
<td>34%</td>
</tr>
</tbody>
</table>

4. Wanna jump on the Remote Inspection panel to discuss your experience?

<table>
<thead>
<tr>
<th>Option</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes - please write your name in the Comments</td>
<td>12%</td>
</tr>
<tr>
<td>No thanks</td>
<td>44%</td>
</tr>
<tr>
<td>No - I don't have experience</td>
<td>45%</td>
</tr>
</tbody>
</table>
Remote Inspection Panel

- Attendee note: please use Q&A for panel questions, can be anonymous if needed.
- If we don't get to all queries, SC will review and respond via TMF RM website – will take us a bit of time, patience appreciated!
# TMF–related events coming up*

*Events page on website (under Resources menu)*

<table>
<thead>
<tr>
<th>Conference</th>
<th>When</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>DIA Regulatory Submissions, Information, and Document Management Forum</td>
<td>February 14–16, 2022</td>
<td>North Bethesda, MD, USA</td>
</tr>
<tr>
<td>MHRA GCP Seminar</td>
<td>March 7 – 9, 2022</td>
<td>Remote, UK</td>
</tr>
<tr>
<td>Association for GXP Excellence</td>
<td>May 1–4, 2022</td>
<td>San Antonio, TX, USA</td>
</tr>
<tr>
<td>Questex TMF Summit</td>
<td>May 3–5, 2022</td>
<td>New Orleans, LA, USA</td>
</tr>
<tr>
<td>8th Clinical Trials Strategic Summit</td>
<td>May 4–5, 2022</td>
<td>Boston, MA, USA</td>
</tr>
<tr>
<td>HSRAA Conference</td>
<td>End of September 2022</td>
<td>TBD in UK</td>
</tr>
<tr>
<td>Hanson Wade Trial Master Files &amp; Inspection Readiness</td>
<td>End of September 2022</td>
<td>Boston, MA, USA</td>
</tr>
</tbody>
</table>
TMF RM General Meetings

- 14th March 22
- Add to your calendar NOW or download the calendar file (.ics file) from our [homepage](#)
- Outlook Meeting Request no longer distributed
ICH E6R3

- Update on progress report:
QUESTIONS?

Join the TMF Reference Model Discussion Group
https://tmfrefmodel.com/register

• Knowledge sharing
• Networking
• Too Much Fun!

Join the TMF Reference Model Project Team
(be prepared to work! – we can’t do this without YOU)
https://tmfrefmodel.groups.io/g/main
Wondering where to find details of the next meeting?

On TMF Reference Model website, click on calendar to see meeting details. Click 'Copy to my calendar' to add to your Outlook / Google calendar.
Wondering where to find details of the next meeting?

On Groups.io, click on Calendar to show group calendar. Click on an event to see dial-in details

https://tmfrefmodel.groups.io/g/main/