

Using Chromeleon 7.3 CDS to comply with regulations



Built for Compliance

Built for **Data Integrity**

Without compromise

Thermo Scientific™ Chromeleon™ 7.3 Chromatography Data System (CDS)

Agenda



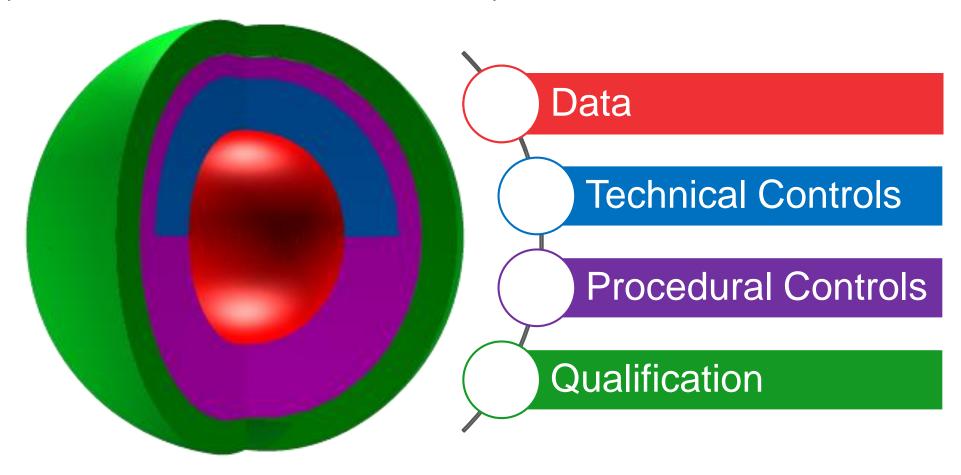
Built for Compliance

Built for Data Integrity

Without compromise

Built for Compliance

- Compliance layers
 - Compliance must be combination of technical and procedural controls



Built for Compliance

- Software must be capable of 21 CFR Part 11 compliance
- Compliance can be considered in four categories:
 - Security
 - Access control and data security
 - Record Management
 - All data stored, controlled and archived
 - Audit Trails
 - Traceability of all actions in CDS
 - No loss of productivity
 - Qualification
 - Verify correct performance
 - Time/costs must be minimized



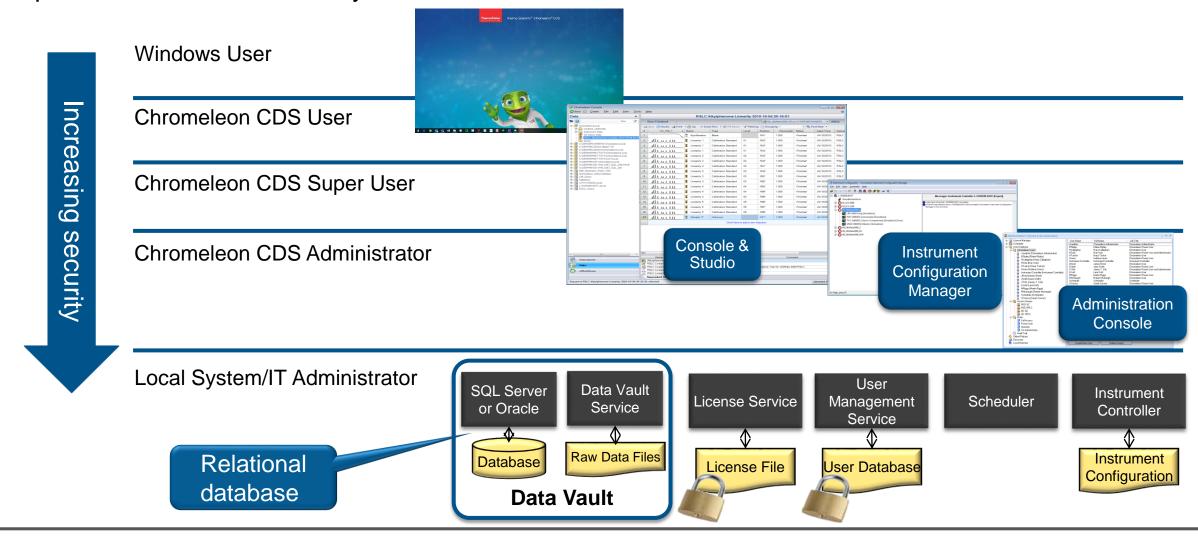






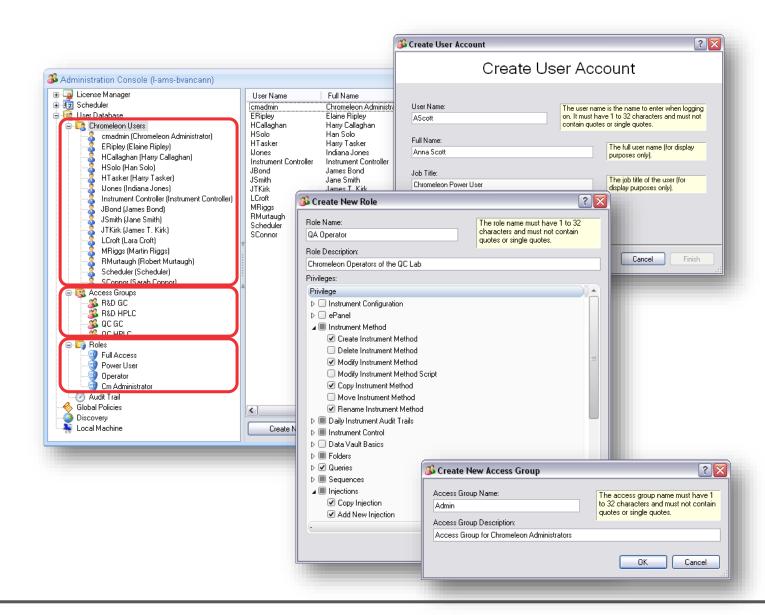
Built for Compliance – Security

Multiple levels of access security



Built for Compliance – Security

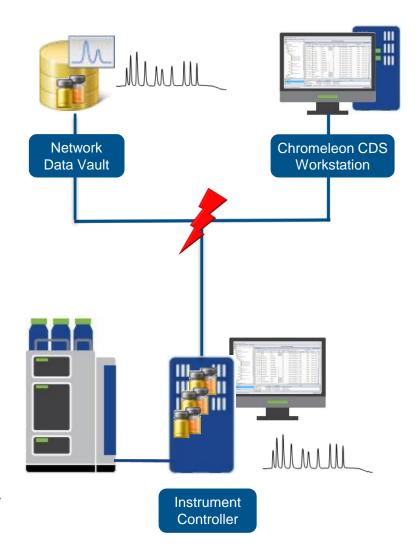
- Comprehensive user management
 - Create unlimited users, roles and access groups
 - Role is collection of privileges
 - · Defines what user can and cannot do
 - User can be assigned different roles
 - At login can choose an assigned role
 - Access and roles can be controlled at every level
 - Data Vault, Folder, Instrument





Built for Compliance – Security

- Data security
 - No loss of data and 24/7 lab uptime with Network Failure Protection (NFP)
 - License and User Management information cached locally
 - Instrument and user licenses always available
 - Users can always logon and continue to work
 - XVault technology ensures continuous operation
 - NFP mode automatically enabled at network failure
 - Uninterrupted data acquisition
 - After network recovery, data automatically uploaded to central server
 - User can log on to instrument controller to view and edit running queue, submit new analyses, process and report data
 - User management active to ensure data security
 - All information and actions are audited and traceable to protect data integrity



Built for Compliance – Record Management

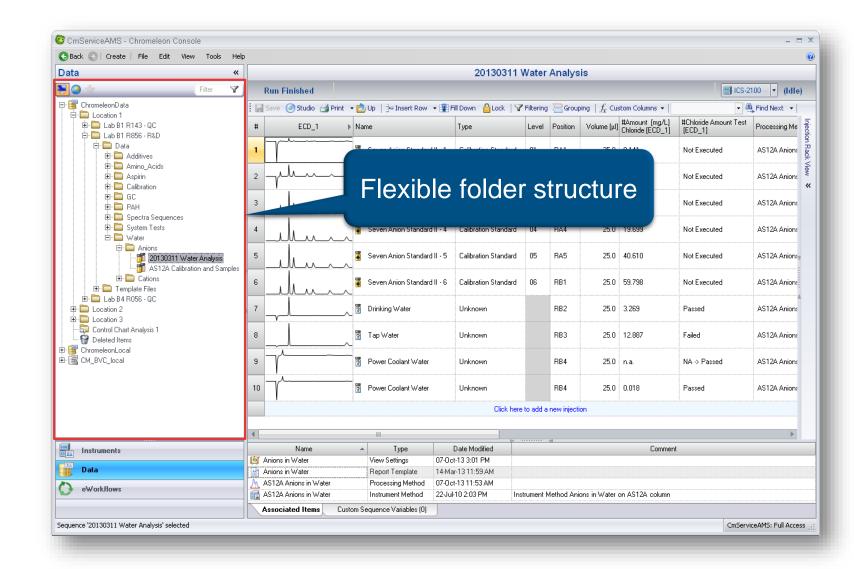
- Flexible data organization options
- Integrated electronic signature functions
- Automatic scheduler tool for archiving
- Exporting in FDA-approved formats



Built for Compliance – Record Management

Flexible Data Organization

- Data Vault concept
 - Mount multiple Data Vaults
 - Local, regional and/or global
 - Mount Chromeleon 6 CDS Datasources
 - Controlled access
- Flexible folder structure
 - Can organize by anything, e.g. project, location, date, user, instrument, etc.
 - Controlled access

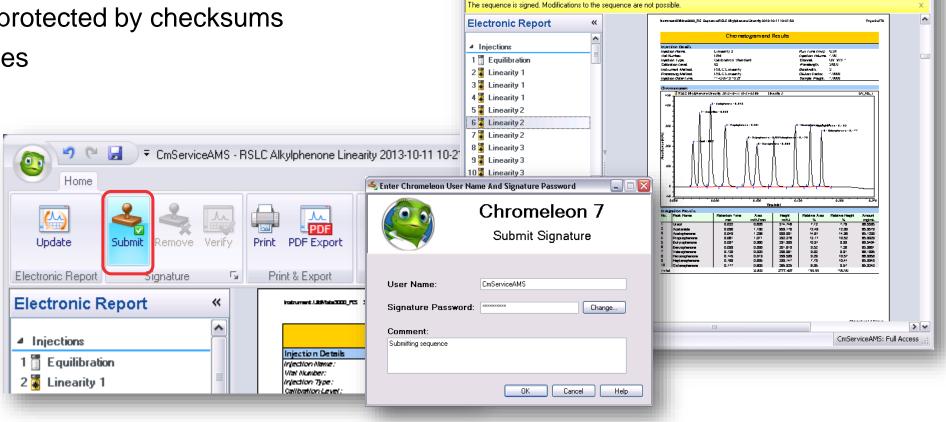




Built for Compliance - Record Management

Electronic Signatures

- 3 Levels of signature Submit, Review, Approve
- Applied to electronic report
- Complete sequence protected by checksums
- Controlled by privileges





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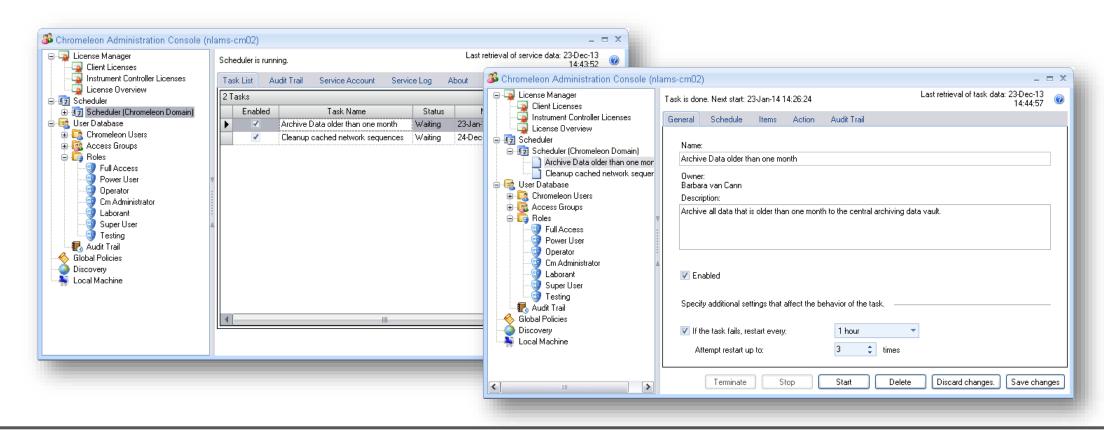
Injection Injection

Print PDF Export

Built for Compliance – Record Management

Scheduler for Automatic Archiving

- Automatically move data by combining powerful injection queries with the Scheduler
- Easily organize your system

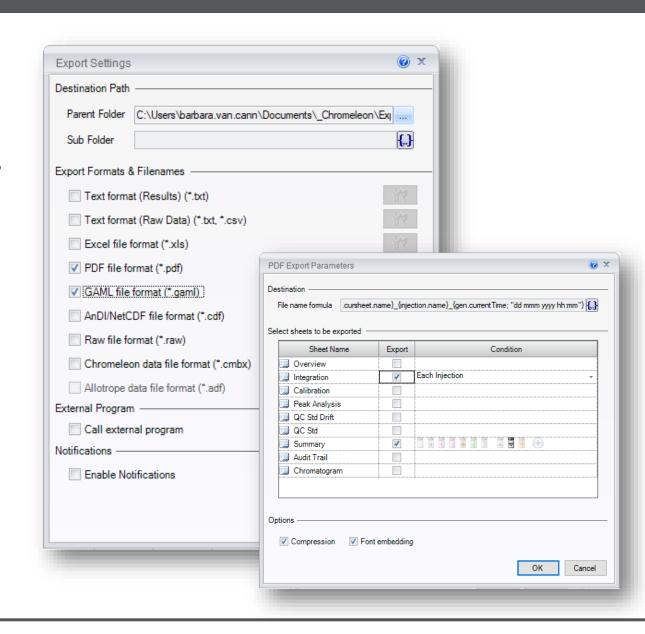




Built for Compliance – Record Management

Exporting

- Chromeleon CDS provides automatic printing or exporting of sequence results with just two clicks
- Print or export results in various formats, e.g.
 - PDF or spreadsheet for client
 - Result export as text or GAML file for LIMS
- Multiple output formats for all purposes
 - Text (TXT, CSV)
 - Excel (XLS)
 - Portable document format (PDF)
 - Generalized Analytical Markup Language (GAML)
 - AnDI/NetCDF (CDF)
 - Raw File (RAW)
 - Chromeleon Data File (CMBX)



Built for Compliance – Qualification

- Qualification vs. validation
 - Qualification prove and document that systems are properly installed, work correctly, and comply with specified requirements
 - Directly related to equipment, systems or software
 - Validation document evidence that assures a process will consistently produce results within specifications
 - Directly related to the process
 - Qualification is part of validation
 - Regulatory agencies take view that end-users of CDS are responsible for its qualification and validation



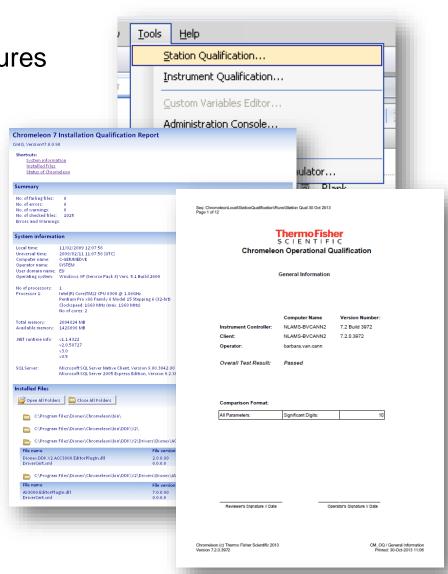


Built for Compliance – Qualification

 Deliverables 	Туре	Responsibility		Thermo Fisher SCIENTIFIC
IQ plan, test scripts, report	Qualification	ler	✓	
Functional Requirement Specifications	Validation			✓
System Configuration Document	Validation			✓
Project Plan	Validation	<u>d</u>		✓
Validation Plan	Validation	S		
OQ plan, test scripts (i.e. val kit), report	Qualification	T .	✓	
User Requirement Specification	Validation			✓
PQ plan, tests, report	Qualification	St	✓	
Traceability Matrix	Validation	NS.		✓
Validation Report	Validation	O		

Built for Compliance – Qualification

- Chromeleon CDS provides complete set of qualification procedures
 - Certificate of Validation
 - Automated Software IQ and OQ
 - Automated Instrument IQ, OQ and PQ
 - Automated System Suitability Testing
- Qualification processes are fully automated
 - Occasional, minor manual interaction for instrument IQ/OQ (e.g. pump priming)
 - Qualification can be performed in as short a time as possible
- All processes are available as standard
 - Requalification can be performed by the customer
 - Ensures down time and cost is kept to a minimum





Agenda

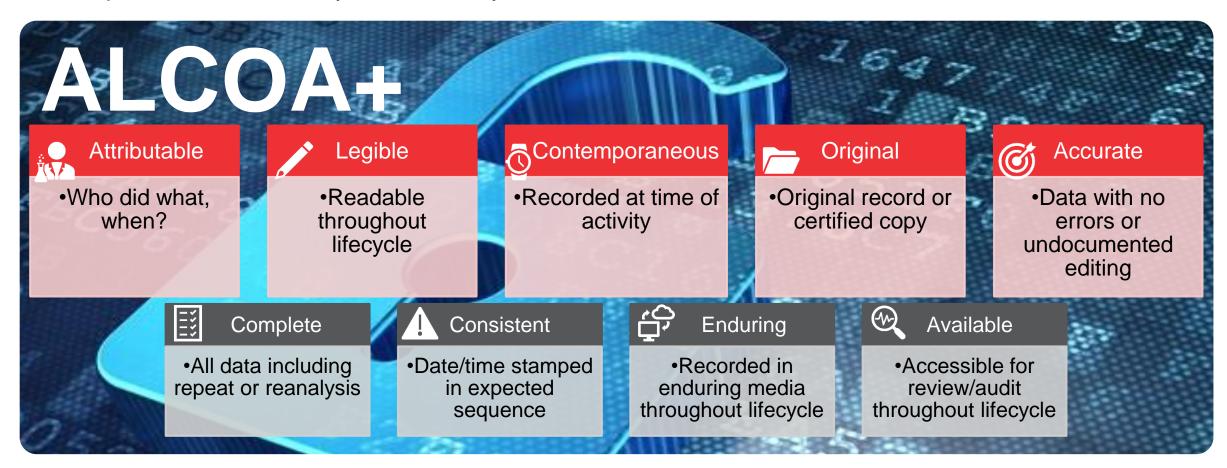


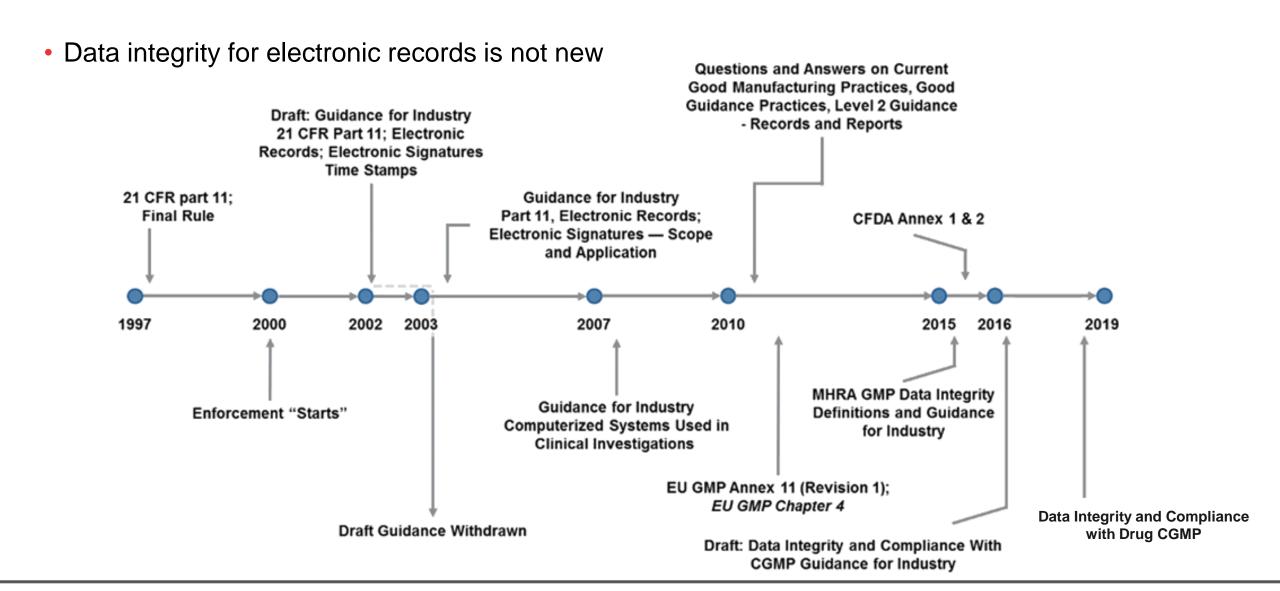
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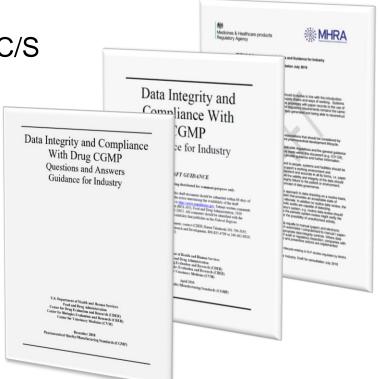
- What is "data integrity"?
 - Completeness, consistency, and accuracy of data





Data integrity guidelines 2015 & 2016 from FDA, MHRA, CFDA & PIC/S

- Clarifies role of data integrity in current good manufacturing practice (CGMP) for drugs
- Contains current thinking on creation and handling of data in accordance with CGMP requirements
- FDA data integrity guidelines Dec 2018
 - Introduces need for regular audit trail reviews
 - US Food & Drug Administration (FDA)
 - International Society for Pharmaceutical Engineering (ISPE)
 - Medicines and Healthcare Products Regulatory Agency (MHRA)
 - European Medicines Agency
 - China Food and Drug Administration (CFDA)
 - World Health Organization (WHO)
 - International Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use (ICH)
 - Pharmaceutical Inspection Co-operation Scheme (PIC/S)



Audit Trails

- What is an audit trail?
 - "Secure, computer-generated, time-stamped electronic record that allows for reconstruction of events relating to creation, modification, or deletion of an electronic record."
 - "Electronic audit trails include those that track creation, modification, or deletion of data and those that track actions at the record or system level."

The chronology of "who did what, when, and why" of a record

- Audit trails are critical requirement of electronic record regulations
 - Enable detection of non-desirable activity
 - Provide tool that influences users' behavior
 - Ensure data integrity
- Regulators use audit trails to review trustworthiness of presented data
- They are aware of available audit trails and expect to see them:
 - Enabled
 - Configured correctly
 - Part of data review or periodic review cycle

 Chromeleon CDS version 7.2 already introduced many compliance features to capture the 'who, what, when and why'

Instrument Audit Trails

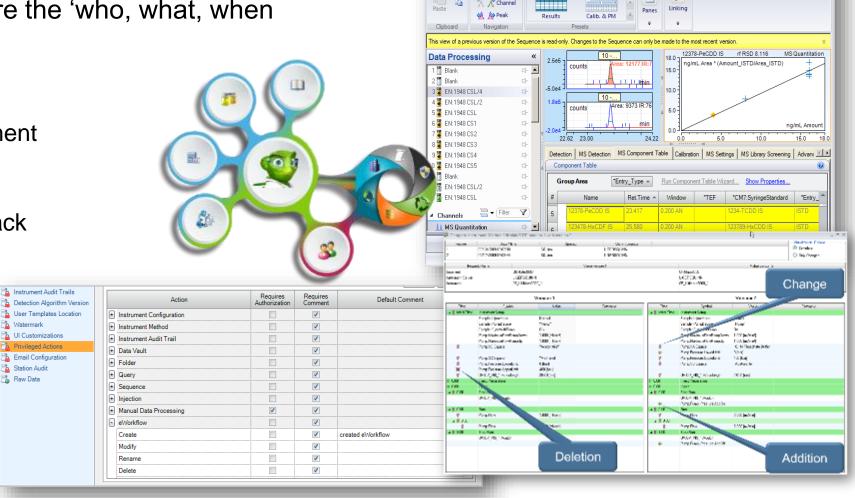
User Templates Location

Email Configuration

Station Audit

Raw Data

- 11 audit trailed areas
- Comprehensive user management
- Privileged Actions
- Version comparison with roll back
- Read-only Studio viewer





psauter - EN1948 to validate 7.2.9 (Sequence, Version 5) - Chromeleon Chromatography Studio

Audit Trails

 Chromeleon CDS provides industry-leading audit trails

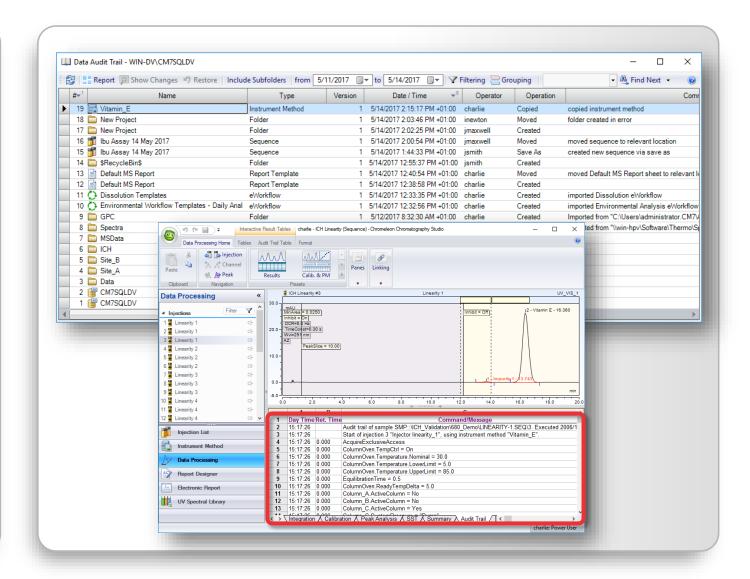
- 11 audit trailed areas
- 3 main audit trails
 - Instrument
 - Data
 - Administration
- All audit trails can be stored and managed centrally in Chromeleon CDS



- Audit Trails
 - Chromeleon CDS provides industry-leading audit trails
 - 11 audit trailed areas
 - 3 main audit trails
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 - All audit trails can be stored and managed centrally in Chromeleon CDS

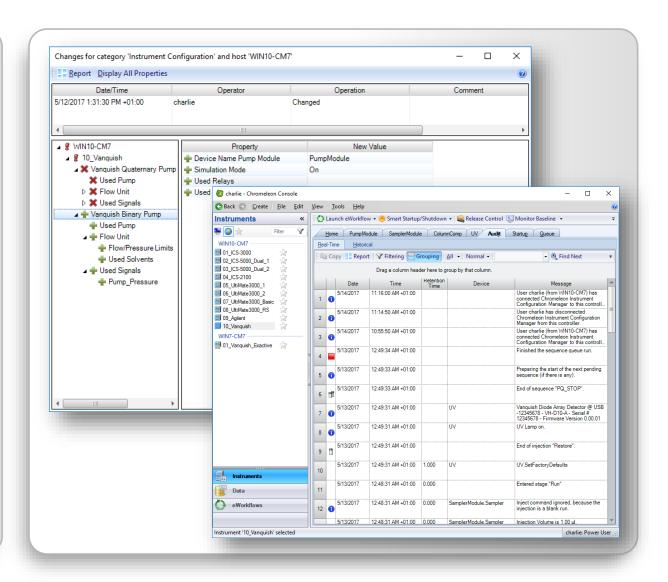


- Data Audit Trail
 - Log of all changes within Data Vault
 - Separate audit trail maintained per Data Vault and per data object, e.g., folder, sequence, injection, etc.
 - Injection audit trail logs all information recorded for a specific injection
 - Stored with & locked to raw data



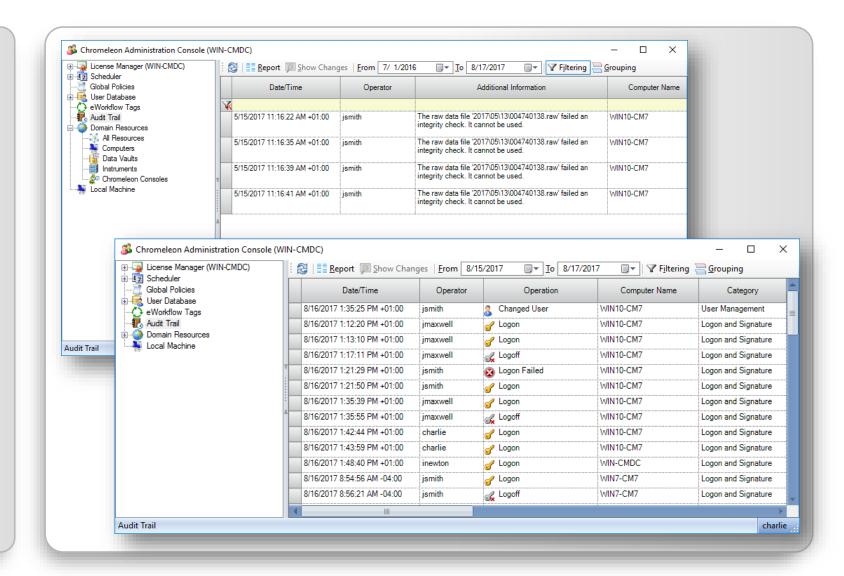


- Instrument Audit Trail
 - Daily event log per instrument
 - Records all instrument operation events, e.g., system events, pre-run settings, commands and errors
 - Log of changes to instrument configuration





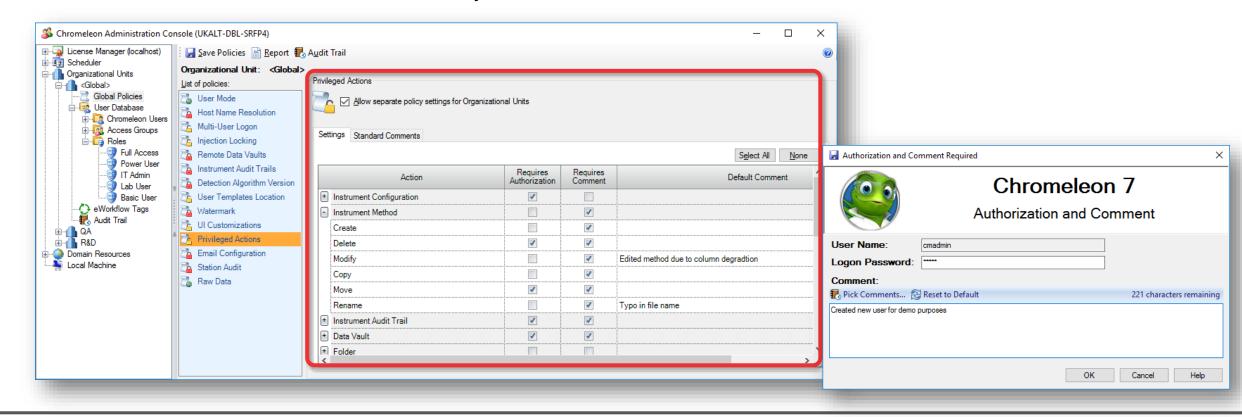
- Administrative Audit Trails
 - Domain Resources
 - Data Vault Manager
 - eWorkflow Tags
 - Station
 - Global Policies
 - Organizational Units





Privileged Actions

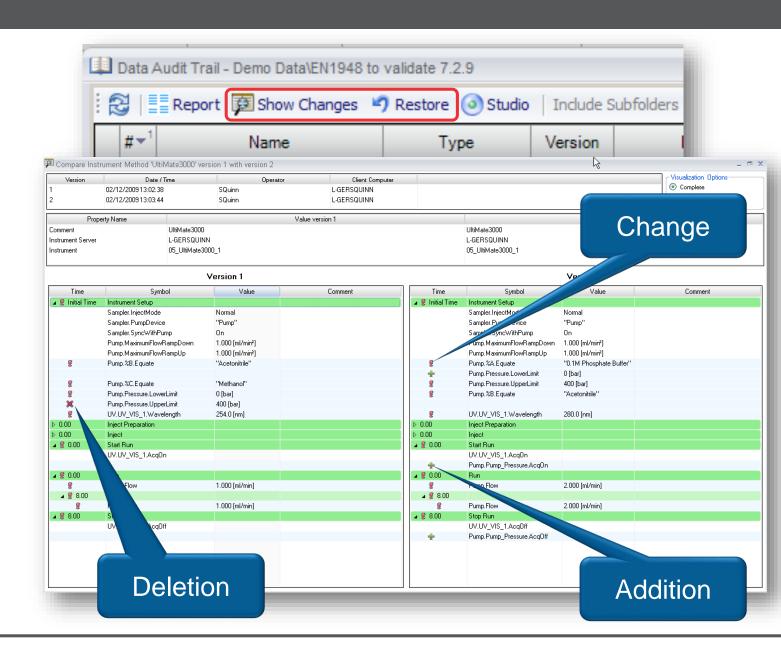
- Require authorization for specified actions
- Ensure users add appropriate comments for specified actions enforcing the "why?"
 - Use standardized comments or free entry





Version Comparison with Roll Back

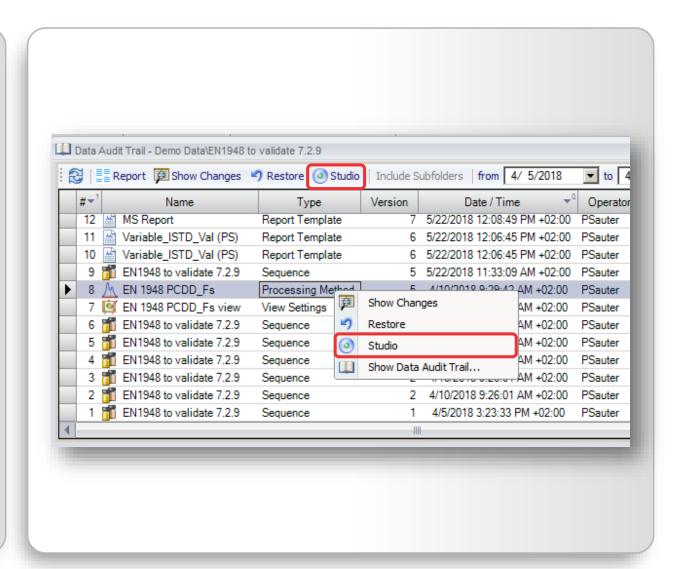
- Show Changes
 - View two object versions side by side
 - Changes in objects easily identified by symbols
- Restore
 - In Data Audit Trail can roll back to previous object version
 - Restore is not permanent until saved
 - Save creates new version



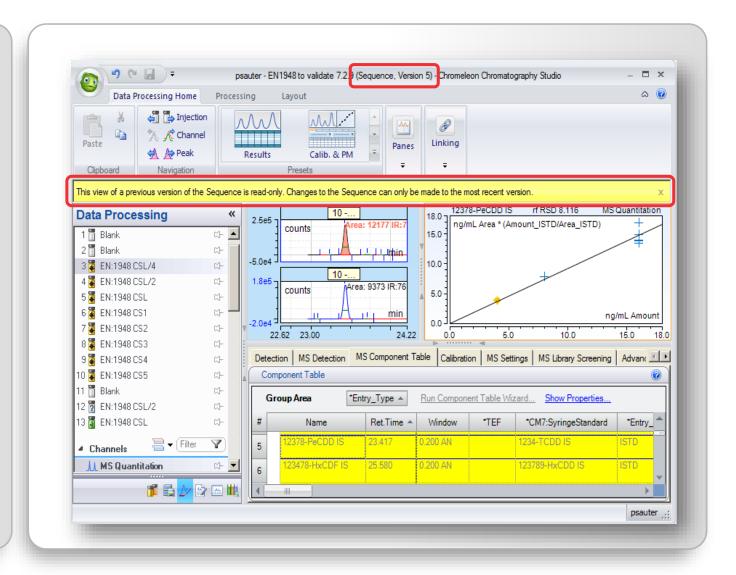


Read-only Studio Viewer

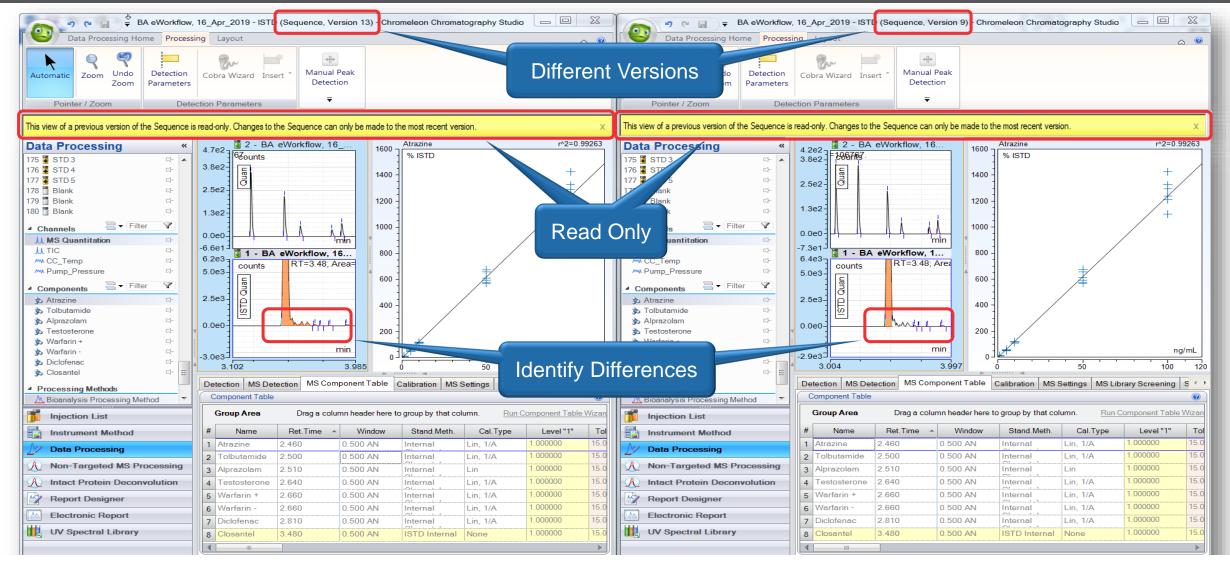
- Studio
 - View object version in a read-only Chromatography Studio session
 - Selected item (e.g., injection, chromatogram, Processing Method, Instrument Method, Report Template, etc.) is automatically opened in a read-only Studio window



- Selected version of sequence shown in caption
- Easy visual comparison of results
- All sequence objects are read-only except View Settings
 - View Settings can be changed but not saved
 - Allows secure data review with zooming, changing panes, resizing, etc.







Open multiple read-only Studio sessions to compare different versions



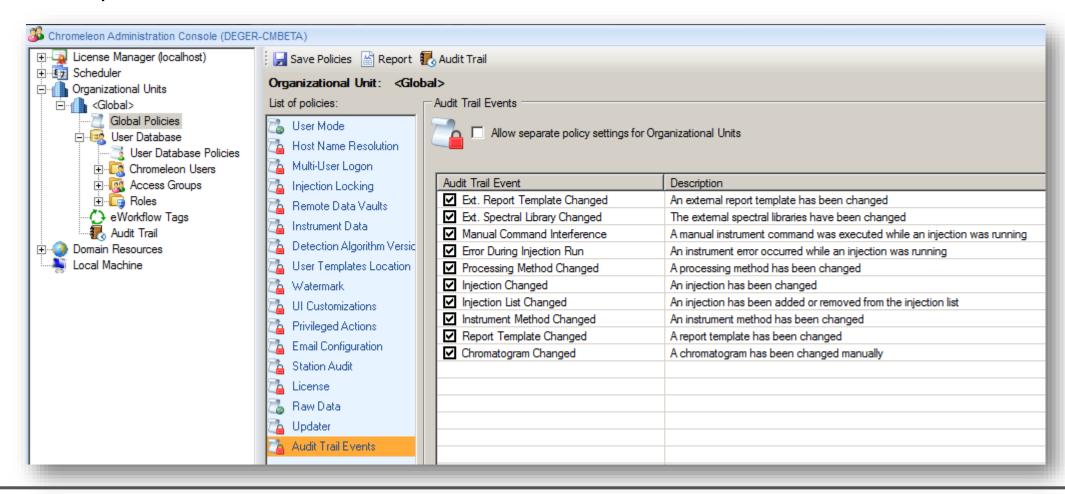
- Compliant customers need to prove (regular) audit trail reviews
- Chromeleon 7.3 software provides framework
 - Configurable Audit Trail Events to highlight specific use cases
 - Connects Data, Instrument and Admin audit trails
 - Workflows to search and report Audit Trail Events



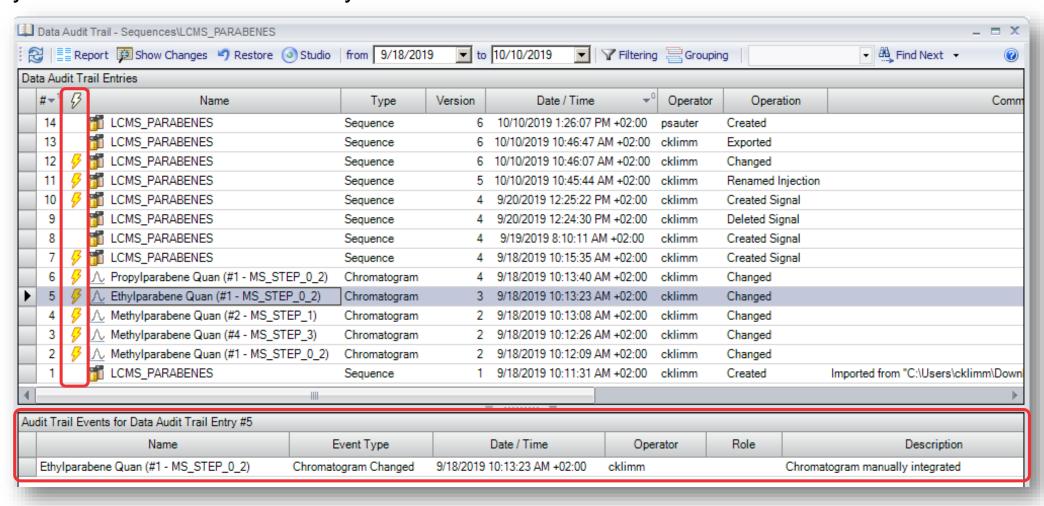




- Audit Trail Events (ATE) configured in Admin Console (global policy)
- When new sequence created, ATE configuration is copied to sequence as <u>read only</u>. From that point, <u>sequence</u> defines which ATE are recorded and which not

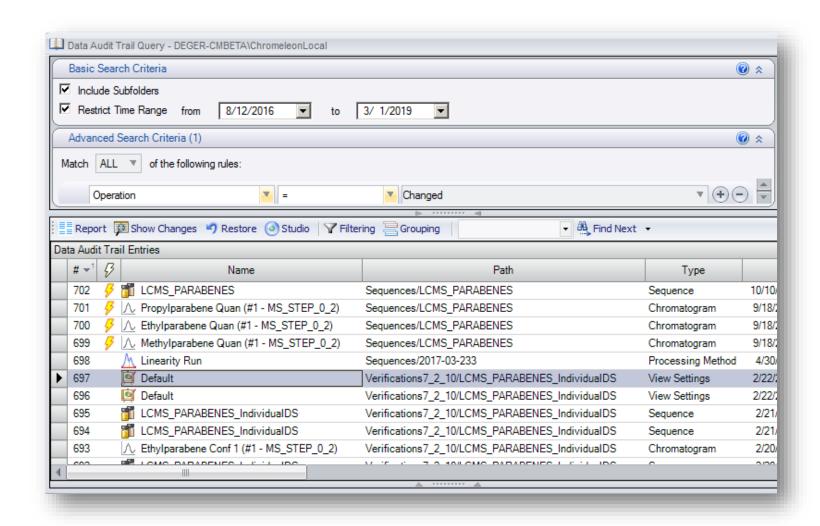


- ATE recorded in Data Audit Trail of Sequence
- Every Data Audit Trail record may have one or more events



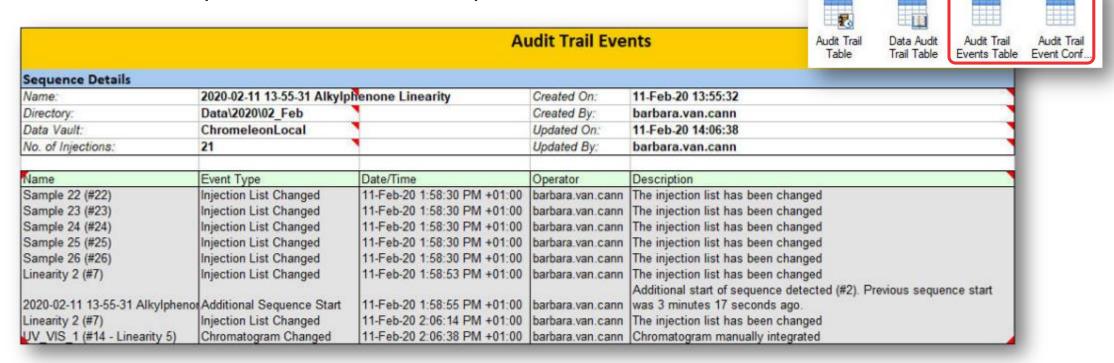


- Audit Trail Query capability
- Executed via database Query
 - Faster than normal Query
- Will also search for ATE





- Two report tables
 - Configured ATE in sequence shows which ATE were configured or not
 - Recorded ATE in sequence shows which events did and did not occur
 - Option to show details of changes old and new values
- Can be embedded in printouts / electronic reports



Status and Audit

Agenda



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Chromeleon CDS – Making Compliance Easier

Technical Controls



Comprehensive set of tools

Easy, centralized administration
User Management with reduced
admin settings

Electronic Reports
and Signatures

Monitoring Adherence



Effective monitoring to enhance behavior

Easy data review with sequence-centered structure Injection & audit trail queries to detect potential issues

Login & logout auditing

Demonstration of Compliance



Easy demonstration of compliance during audits

Audit trails with Query
Version comparison
Audit Trail Events
Advanced reporting tools

Chromeleon CDS Delivers Ease of Compliance

and Chromeleon CDS has passed 1000's of regulatory audits

For more information on Chromeleon CDS software visit:

thermofisher.com/chromeleon

Like Charlie Chromeleon on Facebook to follow his travels and get important updates on chromatography software!



Facebook.com/CharlieLovesChromatography

Join the LinkedIn customer forum to discuss Chromeleon CDS with us and your industry peers.



Chromeleon CDS User Group

Thank You!



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Why compromise?

Chromeleon 7.3 CDS