

# Electronic signatures in Adobe Sign & 21 CFR Part 11 Compliance

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### **Objectives**



### After this presentation you should better understand:

- When to use Adobe Sign for electronic signatures in clinical research
- What are the 21 CFR Part 11 requirements
- How Adobe Sign meets these requirements with the new Bio-Pharma settings
- How the new settings impact sending a document for signature
- How the new settings impact signing a document

### **Electronic Signatures**



- Health Canada (GUI-100) states "Electronic signatures are considered acceptable, only if the electronic system is fully validated. The proper controls should be in place to assure that the signature belongs to the user who applied it. Limited access or passwords should be used accordingly."
- Health Canada does not have its own regulation on electronic signatures, but often references 21 CFR Part 11 standards.
- The University of Calgary expects all regulated clinical trials (Health Canada and/or FDA) that choose to use electronic signatures, to utilize 21 CFR Part 11 compliant electronic signatures.
- All clinical researchers who access the University of Calgary Adobe Sign will be provided with the 21 CFR Part 11 version.

### **Requesting Adobe Sign**



 Request form for Adobe Sign is now available on the <u>Service</u> <u>Now</u>

	Information	Search All UCalgary.ca Q		
	Home My Stuff	IT Services Knowledge Base	News & Updates	Contact & Help 🛛 🏲 Cart
Search IT services Search IT services Q Services	Applications and software Browse IT Services			
Applications and software Audio visual (ComMedia) Collaboration, storage and file shares Desktop computing Email and calendar IT onboarding	Installation, acquisition or renewal of ap Filter by: <u>All (25)</u> • Available for studer Administrative Virtual Private Network (VPN) Request access to Admin VPN	plications and software. Its (5) • Available for faculty/staff (2: Adobe Sign Enterprise Request for software to collec electronically signed documents	5) t Request ac products an	cess to ArcGIS nd services.
IT services for IT Network and telecom Printing Reporting and data analytics	Request for access to a citrix environment	Custom Domain validation request Request to add a Domain to enable the issuing of SSL certificates	The Desire instructor D2L (also re Brightspace learning ma	2Learn (D2L) for s eferred to as e) is the University's anagement system

# When to use Adobe Sign for clinical research



 Adobe sign can be used for study level documents (protocol signature page, Health Canada submissions, delegation logs, etc)

× Adobe sign should <u>NOT</u> be used for patient level documents (labs, consent forms, etc)

Health information cannot be shared with Adobe Sign

If your study team is interested in electronic consent, this can be accomplished with the validated instance of REDCap (CRU)



### What is 21 CFR Part 11 Compliance?

#### 21 CFR Part 11 regulatory requirements for **Subpart B – Electronics Records** are:

- 1. Sec. 11.10 Controls for closed systems
- System access is controlled by University of Calgary, who has established processes and procedures to provide access to Adobe Sign, as well as manage electronic records.
- 2. Sec. 11.30 Controls for open systems
- N/A (University of Calgary manages system)
- 3. Sec. 11.50 Signature manifestations
- Adobe Sign signature includes the name of the signer, date and time, as well as reason for the signing.
- 4. Sec. 11.70 Signature/record linking
- Audit report captures the signing history for each document.
- 5. Sec. 11.200 Electronic signature components and controls
- University of Calgary uses a two-step process to authenticate a Signer. The Signer's email address and one-time verification code (OTP) is sent to the Signer email inbox.
- 6. Sec. 11.300 Controls for identification codes/passwords
- University of Calgary sends the one-time verification code (OTP) to the Signer email inbox. Verification code must be inputted into Adobe Sign pop up window prior to accessing the document.



# How to prepare and sign a document with the new settings?

Adopted from University of Calgary Adobe Sign 21 CFR Part 11 Compliance Document Job Aid

#### Step 1:



1. Launch Adobe Acrobat Sign Login — Sign in to your e-signature account

<u>(echosign.com)</u> OR manually type below URL address:

https://secure.na3.echosign.com/public/login

2. Sign in using your UCID network id and password. The **Adobe Sign Home** page will display.



Sign In To Your Account	Adobe Acrobat Sign
Email: Password:	works right inside your everyday apps.
Remember Me	Learn more
Sign In	
I forgot my password	

#### **Step 2:** Click *"Send"* to prepare an envelope for signature

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#### Step 3:



## Select your department group name from the *"Send From"* field, click the drop down box

Powered by Adobe Acrobat Sign	Home Sene	d Manage	Workflows Reports Account
			Get documents signed       Switch to new experience         Send an agreement to others for e-signing, approval, or other processing.       Send from:       Default Group (Primary Group)         Send from:       Default Group (Primary Group) <ul> <li>Default Group (Primary Group)</li> <li>Default Group (Primary Group)</li> <li>CCCR</li> <li>CML Legal - Part 11 Compliance</li> </ul> Add Me     Add Recipient Group     Image: Complete in Order     Image: CML Legal - Part 11 Compliance
			Show CC Message* Agreement Name Please review and complete this document. Options Completion Deadline
			Files*     Add Files       Drag & Drop Files Here
			Preview & Add Signature Fields           Next

#### Step 4:

## Confirm "Send From" field displays the correct department group name before proceeding.



UNIVERSITY OF Adobe Acrobat Sign	Home	Send	Manage	Workflows	Reports	Account			
				Get do Send an	agreement	t <b>s signed</b> to others for e-sig R	gning, approval, o	r other processir	ıg.



#### **Step 5:** Recipients Section – add Signer's email address.

Get documents signed Send an agreement to others for e-signing, approval,	or other processing.	Switch to	o new experience
Send from: CCCR	• 0		
Recipients* Complete in Order Complete in Any Order		Add Me   Add Recip	pient Group 🛛 🔞
1 Ø~		📴 🗸 Email OTP	$\varTheta$ ×
2 🔗 🗸 Enter recipient email			

- **1.** Add Recipient email addresses and attached documents for signature.
- 2. Click "Next" to proceed to the next screen.
- 3. Assign the Signer's "Signature" field and the Signer's "Date" field for each signer.
- 4. Click *"Send"* to send the envelope to the signers.

#### Step 6:



Signer Receives Envelope – Signer will receive an email advising there is a document waiting for their signature.



#### **Step 7:**

# and CALGARY

## One Time Verification Code – Signer will click on *"Review and sign"* link and the following screen will display.



#### Step 8



Verification Code Email – Verification code email sent to Signer's email inbox from Adobe Sign. Signer will input this code into the Verification Code field.



#### Step 9



#### **Input Verification Code**

1. Signer inputs verification code "751597" and clicks the "Verify" button



System will verify the verification code and display the document for signature.
 Signer will sign the document and click *"Finish"*.

**Note:** The verification code will remain active for 10 minutes. After 10 minutes, the Signer will have to click the **"Resend Code"** button (located under the Verification Code field) to generate a new verification code. Signer has five (5) attempts to regenerate a verification code before the link will expire. Once the verification code link expires, the envelope is cancelled and a new envelope will need to be created.



### Contacts

For questions related to Adobe eSignatures please contact <u>jldobry@ucalgary.ca</u>



# Thank You