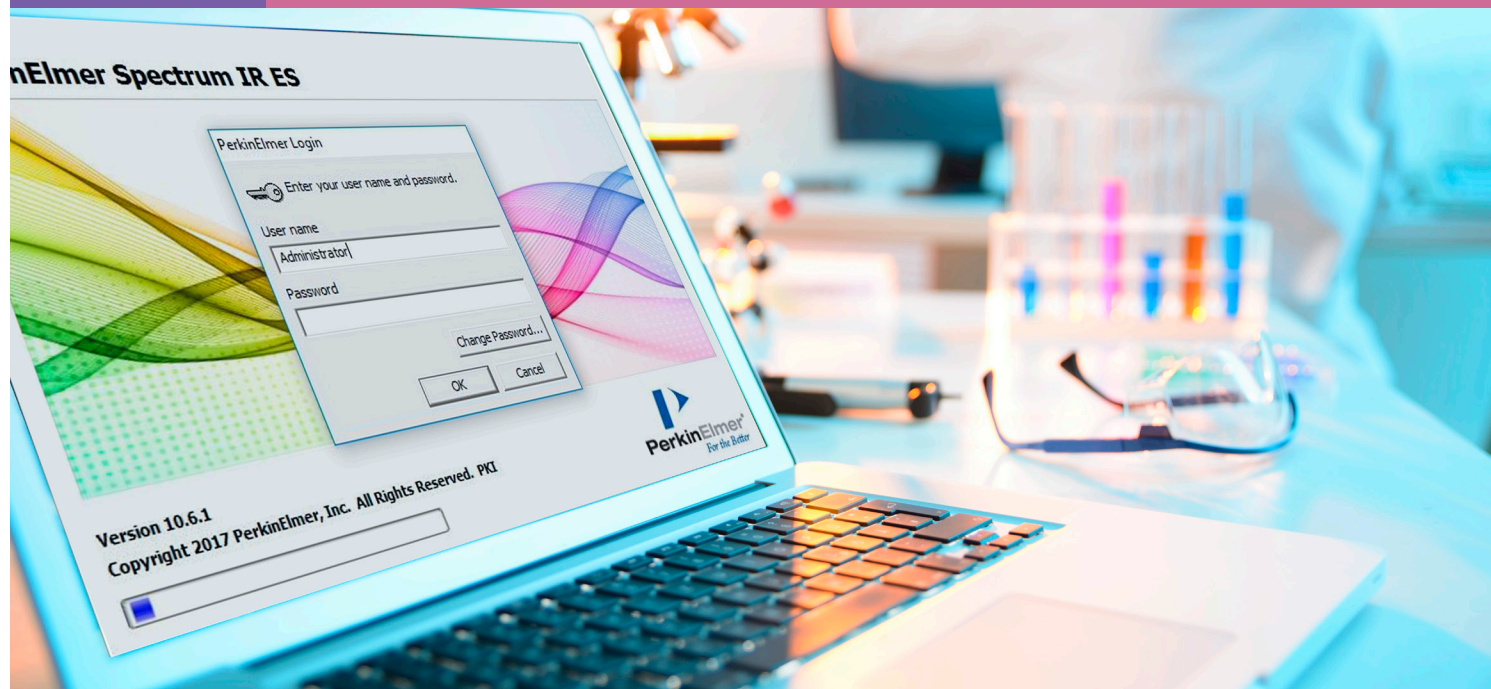


Data Integrity – Spectrum 10 Enhanced Security (ES) Software for Infrared Spectroscopy



Introduction

The FDA defines data integrity as “completeness, consistency, and accuracy of data. Complete, consistent, and accurate data should be attributable, legible, contemporaneously recorded, original or a true copy, and accurate (ALCOA)”.¹ ALCOA itself has evolved to ALCOA Plus, which incorporates two of the fundamental definition terms as stated by the FDA; complete, consistent, enduring, and available.² Compliance with 21 CFR Part 11 is mandatory for pharmaceutical companies and their suppliers to sell products into the United States, and also applies to other related industries.

PerkinElmer’s Spectrum™ 10 Enhanced Security (ES) software platform for infrared spectroscopy provides structural requirements and features to assist with the needs for ensuring data integrity and compliance. It affords the system owner the ability to comply with regulations and incorporate features into the validation plan to exhibit compliance. The purpose of this document is to demonstrate how Spectrum 10 ES meets the technical requirements for 21 CFR Part 11.

Spectrum 10 ES

Spectrum 10 ES provides tightly controlled setup, collection, and reporting of IR data to meet the technical demands of 21 CFR Part 11 compliance (Figures 1 and 2). In addition, the software has an easy-to-use interface to lower the training requirements for non-specialised operators. Most functions within Spectrum 10 are identical in standard (STD) and ES versions. However, the main differences are related to:

- Logins
- Permissions
- Electronic signatures
- Protection of records
- Working with audit trails

Spectrum 10 ES is compatible with the Spectrum 3™, Frontier™, Spectrum Two™ and Spectrum Two N™, Spectrum 400, Spectrum 100/100N, and Spectrum One/NTS PerkinElmer FT-IR and FT-NIR spectrometers. The software will only read recognized encrypted PerkinElmer file formats.

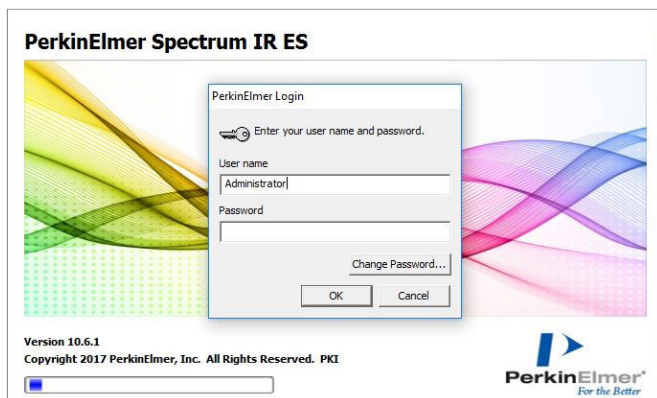


Figure 1. Login window for Spectrum 10 ES software.

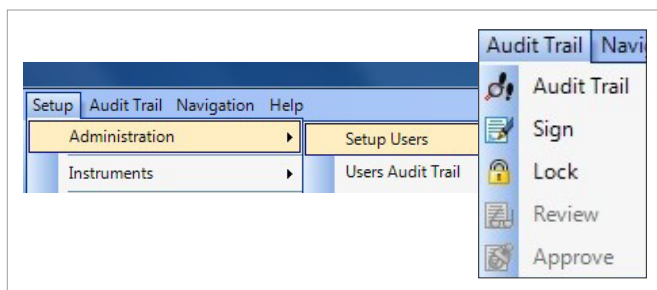


Figure 2. Enhanced security features are shown on the tool bar in Spectrum 10 ES. Note: 'Setup users' and 'Users Audit Trail' is only available to Administrators.

Also available for IR spectroscopy are PerkinElmer's Enhanced Security AssureID ES and Spectrum Touch™ ES to allow optimized workflow-oriented methods. Spectrum Touch ES provides a simplified, easy-to-use interface for running a pre-designed application (App) to perform a specific analysis, whilst helping comply with 21 CFR Part 11 guidelines (Figure 3). The highly customizable Touch Apps are created using Spectrum 10 ES and Spectrum Touch Developer. Configuration of the ES features is also carried out using Spectrum 10 ES. Spectrum Touch ES is optimized for touch screens to facilitate mobility around a manufacturing environment. However, the software can also be installed on standard computers.

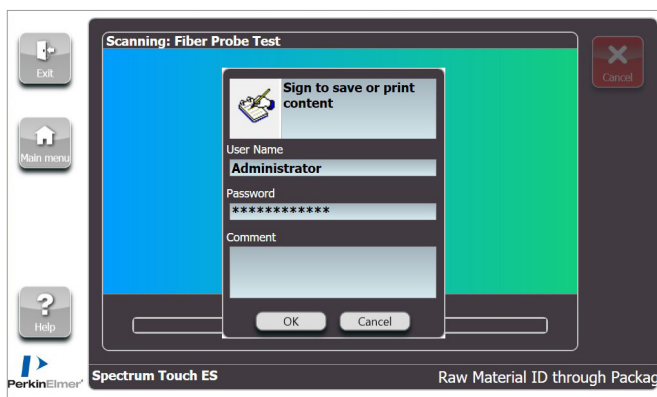


Figure 3. Spectrum Touch ES interface demonstrating login required to sign for data generated.

Software Logins

Unique user names and passwords are required for all authorized users to access Spectrum 10 ES software and cannot be reassigned. The instrument Service Mode is also under password control and only available if logged in as a service user. Users can be setup by the Administrator in the software (Figure 4).

Two password login modes are available:

- PerkinElmer login → logins (user name and password) are created for each Spectrum User and remain unique within the system, even after a user has left the company.
- Windows login → login is controlled by the login to the Windows® OS, meaning only one password to remember.

For technical compliance with 21 CFR Part 11, the login security includes administrator-definable features such as password expiration and failed login detection and lockout. All access or attempted access to the system is logged in an audit trail. Users are limited to a specified number of unsuccessful login attempts. If the administrator-defined number of unsuccessful PerkinElmer logins is reached, that user is locked out for a certain period (defined by the administrator) or once they have been unlocked by the administrator. The Spectrum 10 ES Administrator can allocate a new temporary password, which the user is forced to change on its first-time use (i.e. their next login). Due to the high degree of security in Spectrum 10 ES, it is highly recommended that more than one Administrator be created in case one of the Administrators is absent or forgets their password. The software has no 'backdoor' to the security system. If a user is locked out whilst using the Windows login, the company IT administrator will need to unlock their account and/or provide them with a temporary password.

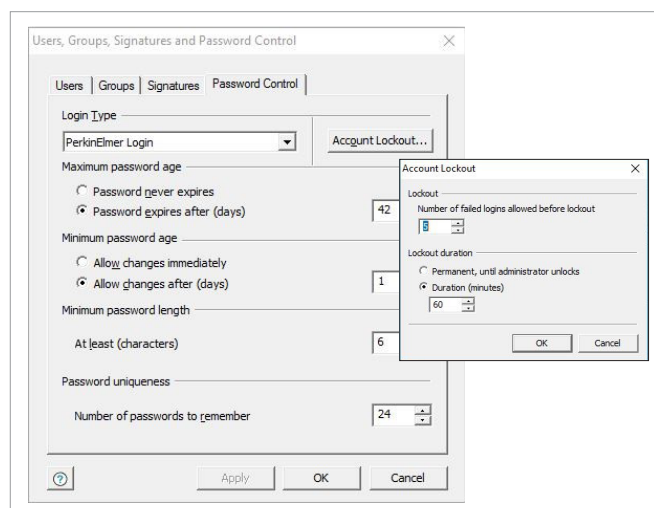


Figure 4. Setup of logins and password control (left) and account lockout (right).

Permissions for Users and User Groups

Spectrum 10 ES enforces authority checks using authorization groups. Each group has its software access rights defined by the selection of permissions. Individual users are assigned to one or more pre-defined groups. At installation, the software has a default set of authorization groups.

Default groups include:

- **Administrators** – major security administration capabilities are set as default (e.g. setting of user/groups logins and permissions). Administrators can be members of other groups (e.g. Users).
- **Supervisors** – have a series of default extended permissions enabled (e.g. saving group workspaces, add/remove instruments etc.), except basic administration permissions. They can also setup and examine users' workspaces.
- **Users** – members can perform all functions in the software, except those associated with Administrators, and Return Workspace, Review and Approve. The users group has fewer default permissions enabled than the supervisor group.
- **Reviewers** – Members of the Reviewers group are intended to act as reviewers of changes, made by other users, requiring an electronic signature. They can also examine others' workspaces.
- **Approvers** – Members of the Approvers group are intended to act as approvers of changes, made by other users, requiring an electronic signature. They can also examine others' workspaces.

Only Spectrum 10 ES Administrators can alter the permissions of the accessible functions for these groups, add new groups, maintain the system, and allocate areas of access to individual users. The groups to which a user belongs can be toggled and define the areas of software they are permitted access to (Figure 5). This allows the application to be customized to the laboratory's most effective workflow according to their specific analytical requirements.

Additionally, Supervisors can setup a default group workspace (Figure 6). This will allow supervisors to transfer their current settings to all groups selected.

Electronic Signatures

Administrators in Spectrum 10 ES can configure Signature Points for certain actions, such as data collection and outputting of results (Figure 7). Signature points can be configured individually, or the same settings can be applied to all Signature Points. Signatures can be entered on exiting, before the action (as appropriate), or by selecting 'Audit Trail' and then 'Sign'. Signatures are also added to report files.

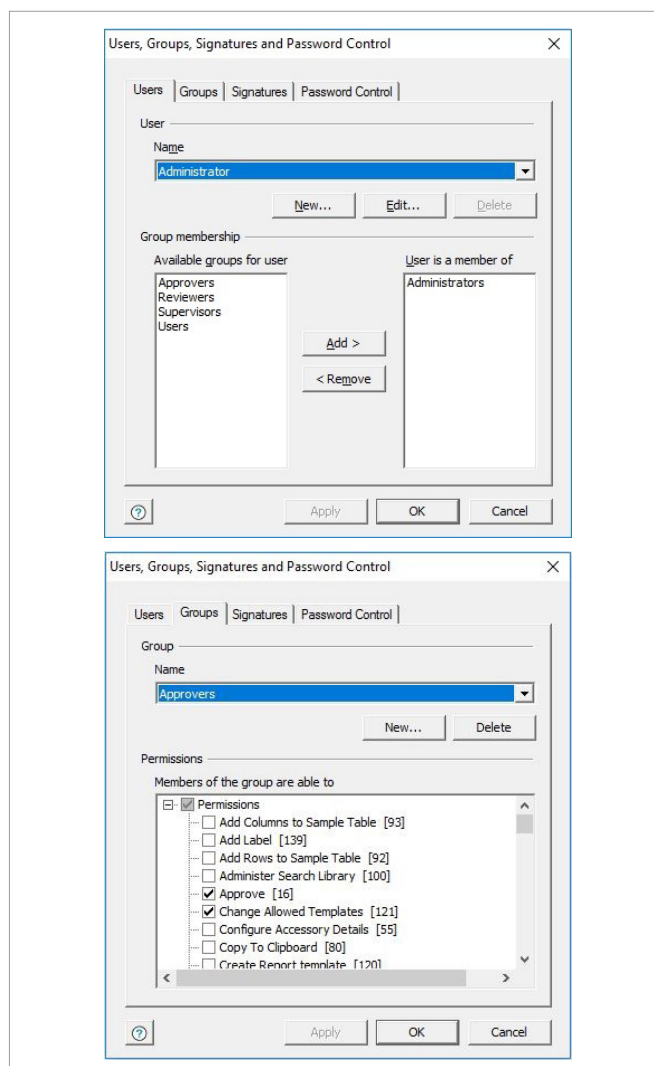


Figure 5. Setting up group membership (top) and group permissions (bottom).

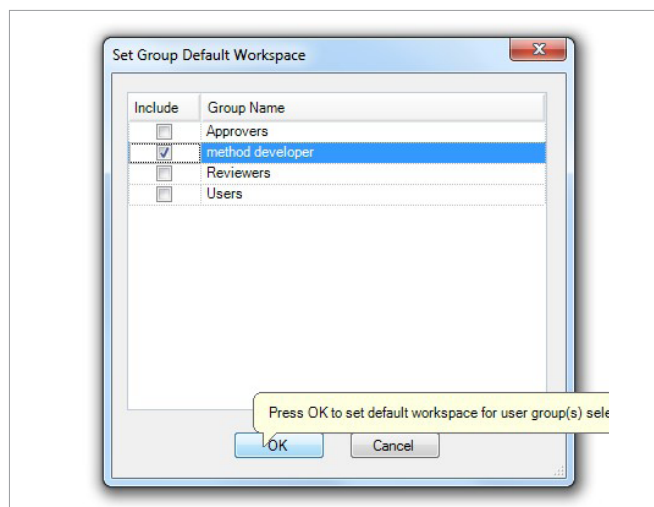


Figure 6. Supervisors' ability to setup group workspaces.

The list of Signature Points within the software is pre-defined, and includes (but is not limited to):

- Loading and saving instrument settings files
- Reporting on ready checks and instrument validation
- Generating reports
- Exporting data
- Deleting graphs
- Creating or making changes to equations and macros
- Approving and reviewing items that have been signed by other users

The user will not be prompted for a signature if 'Signature Required' is not selected for a signature point. If a signature is required, the audit trail will record the user name, date and time when the signature happened, as well as a comment and/or pre-defined reason. Signatures can only be entered by using a user name and accompanying password in the dialog box. The Administrator can decide whether the signature point requires a comment and/or a pre-defined reason. These pre-defined reasons are displayed as a drop-down list at the time of signing. Figure 8 shows examples of available signature dialog box configurations.

Protection of Records

Spectrum 10 ES stores data in a secured SQL database (AssureID ES uses a secure Access database) to ensure complete file protection and data integrity. Many systems use a 'flat file' approach in which spectra are saved as single files (as occurs

with Spectrum STD). Utilizing flat files requires more detailed, manual configuration of the Windows® file system to ensure security of results. Flat files are also limited with respect to the audit trail information they can keep. Spectrum 10 ES gives operators the flexibility to use either flat file or database approaches, and this helps them with transitions from a flat file method to the preferred secured database. In addition, Spectrum 10 ES has a security database which handles system security such as logins, passwords, users, groups, and electronic signature policies.

PerkinElmer secured databases are used to manage data, setups and reports. If data has not been signed for when a power failure occurs, that data can still be recovered from the software and be signed for and saved. Workspaces can also be retrieved from the database to reproduce a working environment to replicate that environment at the time the workspace was saved, which includes data and settings.

The FDA is promoting pharmaceutical companies and related industries to review and approve data electronically. This can be achieved locally on a stand-alone configuration, or even remotely with a network database, using Spectrum 10 ES and AssureID ES software. Saving data on a network simplifies data backup for IT groups.

Audit Trails

Spectrum 10 ES user and results/workspace audit trails are complete, consistent, and comprehensive, and it is possible to view, print and export these for inspection purposes.

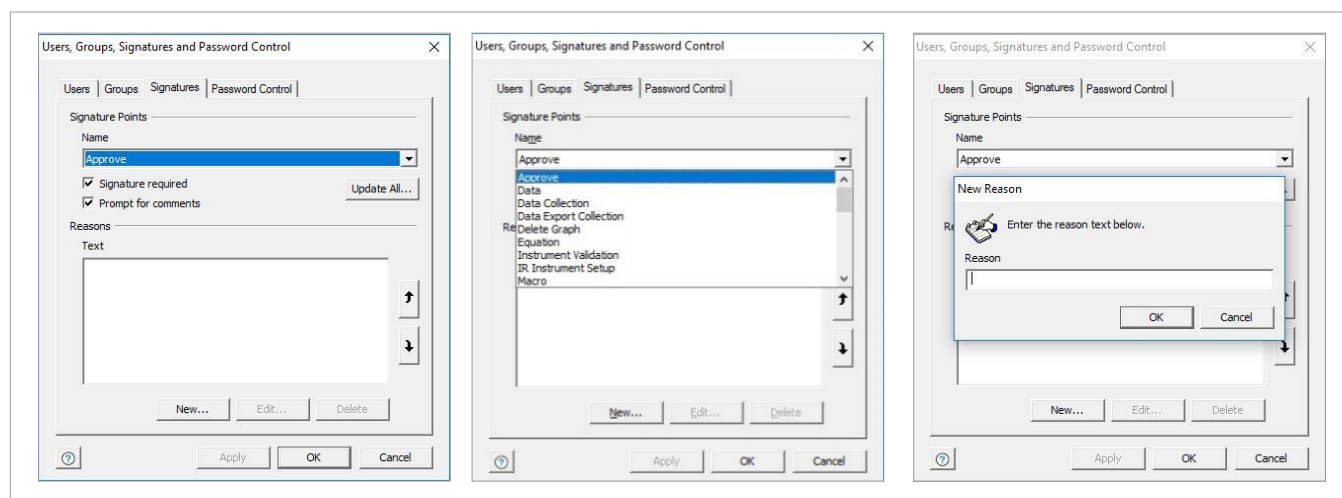


Figure 7. Configuring settings for individual Signature Points.

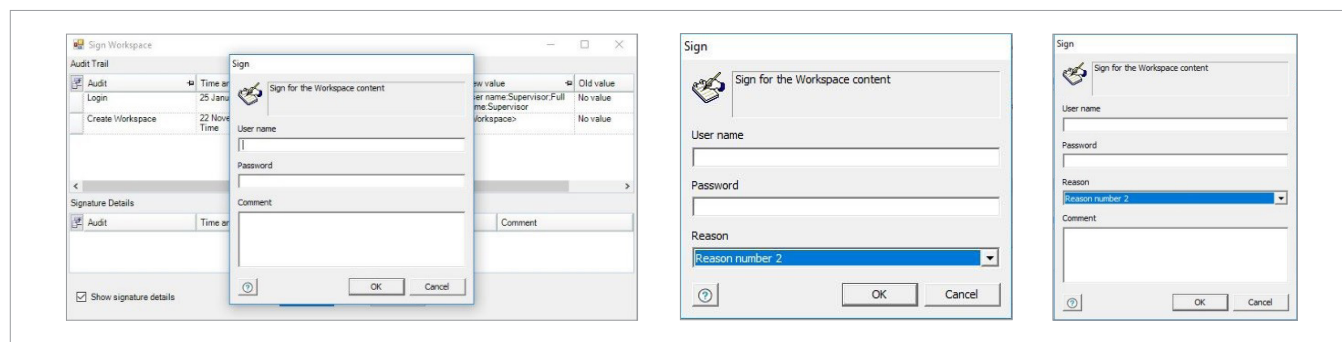


Figure 8. Signature dialog box configurations.

Results/Workspace Audit Trail

The workspace audit trail (Figure 9) records all settings, processes, and results created in Spectrum 10 ES, examples being obtaining spectra, peak labelling, and library searching. This audit trail also contains details of the user, the date and time stamp when the record was created, modified or deleted, the new value, the old value, and the type of modification. The audit trail file is updated when the changes will take effect. As an example, if the instrument settings are changed, the audit trail will record this information when the scan button is pressed. Therefore, if the instrument settings are changed, and then changed again before scanning, only the latest scan settings will be updated in the audit trail upon scanning. Any changes made to the settings which are subsequently cancelled, without being used, are not recorded.

Changes to the records will not obscure previous entries and changes which affect signed data cause a new file (spectrum file, equation, macro etc.) to be created, thus retaining the original. Results or data generated in the software will not be able to be removed or overwritten.

The activities shown in this audit trail can be reviewed, using the same computer or through a network, within Spectrum 10 ES. Workspaces can be loaded, and electronic signatures added using the Return (to analyst), Review or Approve options from the Audit Trail menu, depending on the relevant permissions. The audit trail has a default size of 6 GB but can be increased to 10 GB. Workspaces can be retrieved (Figure 9) to reproduce the working environment at the time the workspace was saved – including data and settings.

Additionally, within the spectra files, a spectrum history is available (Figure 10). This records all sample details, the instrument settings used, any corrections applied during the scan (e.g. AVI), and all actions applied to the data after data collection. The sample history will include the user who performed these actions, which are typically of a processing nature.

Users Audit Trail and Login History

The users audit trail and login history can be viewed by members of the Administrators group only (Figure 11) and are saved in the security database. The users audit trail records all changes to security settings (users, groups, password settings) in compliance with 21 CFR Part 11. The login history details the user, their login and logout times, and the status of the login (e.g. a failed login). It also lists anomalies, such as forced logouts from software crashes. The summary tab contains a list of settings and permissions applied to the workspace and user.

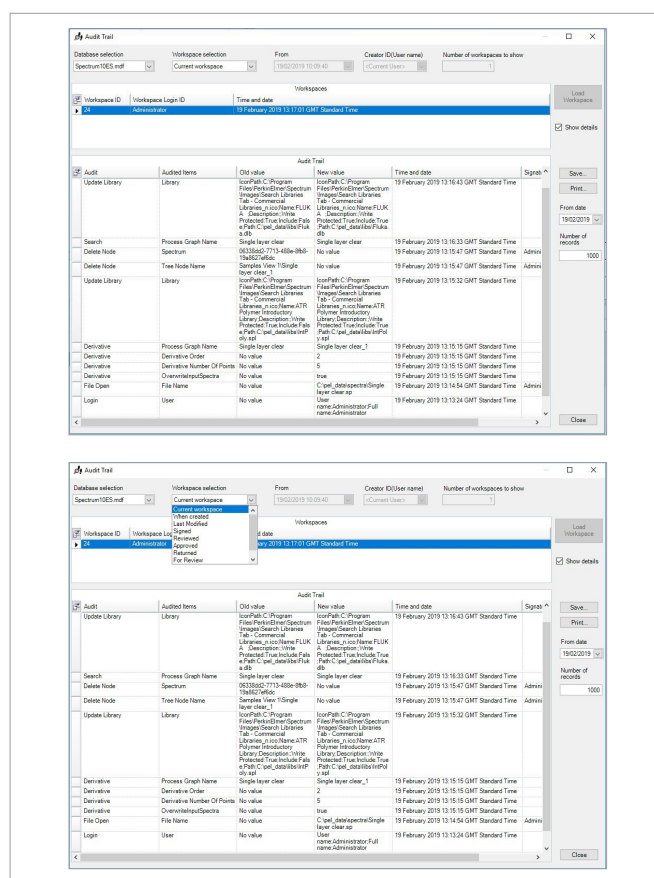


Figure 9. Results/workspace audit trail.

ATPOLM_1_1 History			
Setting	Value	Setting	Value
Filename	ATPOLM_1_1.ap	Instrument Model	1000
Unique File Identifier	85484242	Instrument Serial Number	43073
Creation Date	2019/02/15 15:03	Software Revision	2.10
Analyst	Paula/Elmer	Number of Scans	32
X-Axis Units	cm ⁻¹	Number of Background Scans	32
X-Axis Start Value	4000	Resolution	0
X-Axis End Value	400	Source	DTGS
Data Interval	2	Beamstop	MR
Number of Points	1076	Wavenumber	400
Y-Axis Units	1/T	Apodization	Savitzky
Description	Non-polymer, Dispersed Acid Yang (CH ₂) ₂ by split injection	Scan Type	Spectrum
Comments	Derivative spectrum for ATIS	Phase correction	None
	Search Plus	Scan Speed	0.3
	Library polynes derive from a collected	Scan Type	Double
	purchase library installed with Spectrum	Scan Direction	Bi-directional
	Product, Inc. 6250 Data Parkway,	Scan Coverage	0
	Chapel, New York 10713	Stop	0

History	Value	Setting	Value
Setting	Administrator	Setting	Administrator
Created	2019/02/15 14:50:03	Setting	Administrator
Modified	2019/02/15 14:50:03	Setting	Administrator
Permissions	Full	Setting	Administrator
Comments	ATPOLM_1_1 2.5 "Residual"	Setting	Administrator

Figure 10. Spectrum history.

Spectrum 10 ES allows Administrators to view, print, and export the login history and user audit trail for inspection purposes. It is only possible to clear login history and audit trail entries from the dialog that have previously been exported. If the audit trail contains additional entries since it was last exported, only those entries that have been archived will be removed if requested. If none of the entries have been archived, a warning message will be displayed upon attempt to clear the audit trail or login history (Figure 12). The dialog always records when records in the login history or audit trail have been exported and cleared.

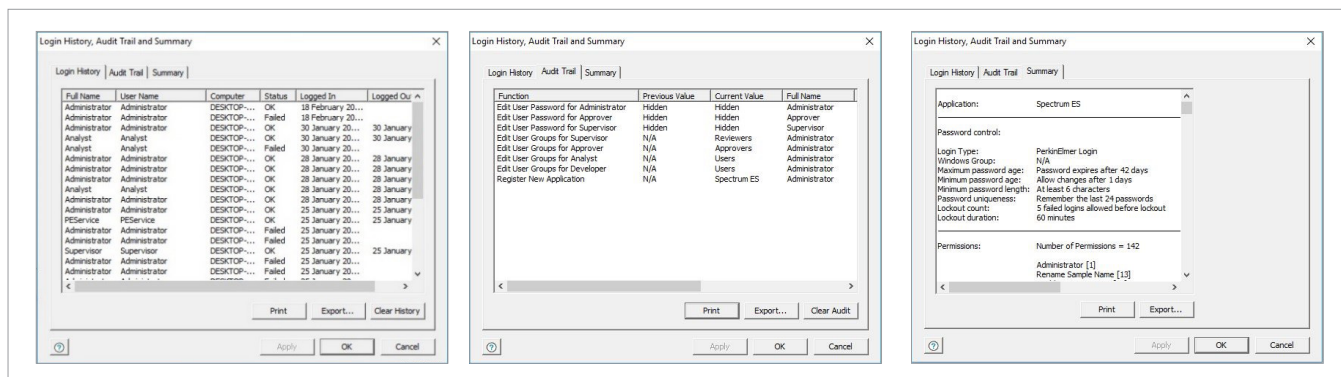


Figure 11. Login history and user audit trail.

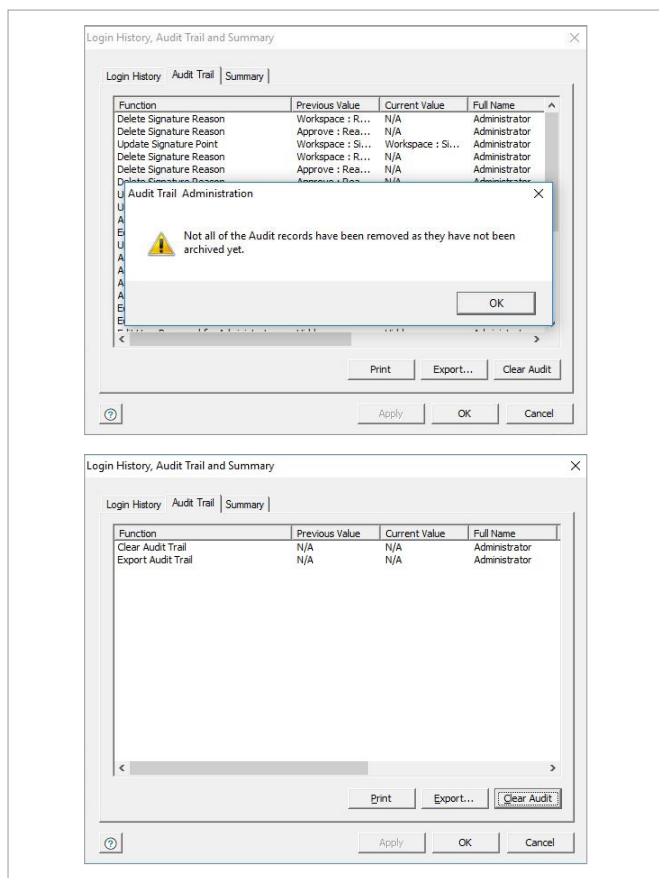


Figure 12. Warning obtained when attempting to clear user audit trail without first exporting (top) and after exporting and clearing the audit trail (bottom).

Spectrum 10 ES Report Designer

An additional feature to satisfy data integrity requirements is Spectrum 10 ES Report Designer. This allows a substantial amount of flexibility in generating reports and saves each report as a secured PDF. These files are encrypted in a unique PerkinElmer format so that any modification will invalidate them, preventing them from loading. Reports can only be generated in Spectrum 10 ES if the appropriate permission has been applied. Similarly, Report Designer can only be opened to create or edit a template if the appropriate permissions have been applied.

Instrument Performance Testing

As with the standard software version, Spectrum 10 ES contains a built-in instrument performance validation solution which can be easily implemented by users to ensure compliance with various Pharmacopeia (Figure 13).

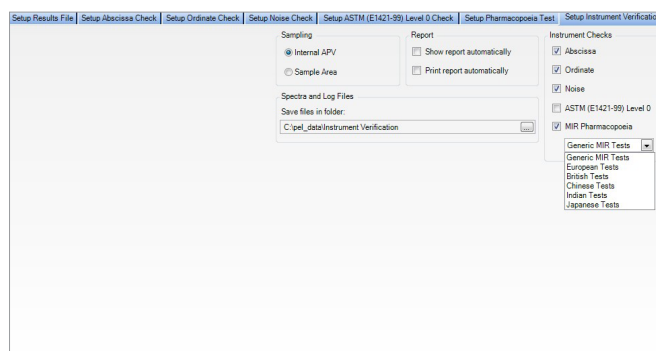


Figure 13. Instrument Verification setup tab in Spectrum 10.

Spectrum 10 ES also performs checks to ensure data collected is valid. As an example, when an accessory is changed, or a higher spectral resolution is selected, Spectrum 10 ES will enforce a new background collection.

In addition, the PerkinElmer OneSource® UOQ program offers laboratories ongoing compliance with continuously evolving regulatory conditions.

The UOQ program includes:

- A protocol which is customizable by the user, including options to test according to pharmacopeial requirements. When finalized, the protocol is approved and then locked so that changes are not permitted during the testing time.
- Instrument testing by a service engineer according to user defined specifications. Multiple instruments may be tested simultaneously to reduce downtime.
- The UOQ report provides an ultra-secure document including pass/fail results and built-in calculations. This report is 21 CFR Part 11 compliant.
- Digital Archiving of data making it easy to provide information required for audits.

The UOQ program supports FT-IR, UV/Vis, HPLC, UPLC, and GC systems, regardless of equipment manufacturer to allow efficiencies in testing, reporting and review of annual operational qualifications.

Conclusion

PerkinElmer's Spectrum 10 Enhanced Security software platform for Infrared spectroscopy provides additional security and data integrity features for achieving compliance with 21 CFR Part 11. In addition to enhanced access control features, ES software automatically stores data, experimental parameters and audit trail information in secure databases. Data operating parameters and events can quickly and easily be recovered for inspection purposes using the "Audit Trail" feature in the ES software. Electronic signature points can be added for certain actions, defined by the system administrator, and included in the audit trail. The comprehensive instrument validation module also allows straightforward approaches to assess instrument performance.

References

1. Data Integrity and Compliance with Drug CGMP: Questions and Answers; Guidance for Industry, Food and Drug Administration, 2018.
2. The 5P Model for Data Integrity, Institute of Validation Technology, 2018. Available from: <http://www.ivtnetwork.com/article/5p-model-data-integrity>.