

A Beginner's Guide to IT System Inspection Readiness: Checklist to Prepare For IT Systems-Related Issues In Inspections

GENERAL ACTIVITIES	
<i>It is important that all personnel have appropriate qualifications, level of access, and defined responsibilities to carry out their assigned duties (Annex 11, §2 [6]).</i>	
Questions related to the organization at the department level	Response
Is the departmental handbook/description or similar document up to date?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are responsibilities included in job descriptions?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is training/competency of staff and consultants documented (e.g., CVs) and up to date?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is ownership of systems/infrastructure/tools documented? Is the information available for this for the past three years?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is the staff list, including external/contract staff, up to date?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Has QMS content been updated according to the review schedule?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Questions about computerized systems in general	Response
Are high-level presentations available?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is it clear who will present the material?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is the functional and purpose overview (data-flow level) in place?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does the presentation include a validation overview?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Can (expert) users adequately perform the document walkthrough?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Questions for technician/support staff (detailed requests)	Response
Are stakeholders (e.g., technicians, archive, document center, vendors) informed and ready to be available during the inspection?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Questions about general controls related to the operation and maintenance of the system	Response
Is there a list of nonconformities and major incidents related to the system for the last two years?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are challenging/complex nonconformity or major incident cases identified and explanations prepared?	<input type="checkbox"/> Yes <input type="checkbox"/> No
IT SYSTEM ACTIVITIES	
Questions about the IT system in general	Response
Are we prepared to share a high-level presentation of the system (3-6 slides), including the system life cycle (from conception to current), that covers the following?	
• Main GxP functions and users	<input type="checkbox"/> Yes <input type="checkbox"/> No
• Validation strategy	<input type="checkbox"/> Yes <input type="checkbox"/> No
• Dataflow	<input type="checkbox"/> Yes <input type="checkbox"/> No
• Software structure	<input type="checkbox"/> Yes <input type="checkbox"/> No
• Hardware structure	<input type="checkbox"/> Yes <input type="checkbox"/> No
• Inputs/outputs of data	<input type="checkbox"/> Yes <input type="checkbox"/> No
Questions based on overview of observations	Response
<i>Review any observations/findings where the actions are still in progress and prepare justifications for these not being closed.</i>	
Do the validation documentation and reports cover the relevant steps of the life cycle? (Annex 11, §4.1 [6])	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is risk management applied throughout the life cycle of the computerized system, taking into account patient safety, data integrity, and product quality?	<input type="checkbox"/> Yes <input type="checkbox"/> No
As part of a risk management system, are decisions on the extent of validation and data integrity controls based on a justified and documented risk assessment of the computerized system? (Annex 11, §1 [6])	<input type="checkbox"/> Yes <input type="checkbox"/> No

Questions about the life-cycle approach for the system	Response
Are the system requirements available?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is there an up-to-date risk assessment in place for the system?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are design specifications in place?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does the system satisfy standards and policies (e.g., security requirements)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Has a design review been conducted?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is the source code in a controlled repository?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Was the code review performed?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Were module and integration tests performed?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is evidence available to verify that the system can consistently deliver accurate and reliable results?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is test evidence available?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does testing cover the following, based on conducted risk assessment?	
• Backup and disaster recovery	<input type="checkbox"/> Yes <input type="checkbox"/> No
• Prevention against loss of critical data and controlled restart after a power failure	<input type="checkbox"/> Yes <input type="checkbox"/> No
• System access and security features	<input type="checkbox"/> Yes <input type="checkbox"/> No
• Audit trails and logging of critical manual interactions	<input type="checkbox"/> Yes <input type="checkbox"/> No
• Manual data entry features, input validation	<input type="checkbox"/> Yes <input type="checkbox"/> No
• Electronic signature features	<input type="checkbox"/> Yes <input type="checkbox"/> No
• Alarms and error messages	<input type="checkbox"/> Yes <input type="checkbox"/> No
• Critical transactions	<input type="checkbox"/> Yes <input type="checkbox"/> No
• Transformation of values into x-y graphs (x-y test)	<input type="checkbox"/> Yes <input type="checkbox"/> No
• Interfaces and data transfers	<input type="checkbox"/> Yes <input type="checkbox"/> No
• Exception handling	<input type="checkbox"/> Yes <input type="checkbox"/> No
• Data archival and retrieval	<input type="checkbox"/> Yes <input type="checkbox"/> No
• The ability to deal with high-volume loads	<input type="checkbox"/> Yes <input type="checkbox"/> No
• System performance	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is the system released by QA with all approvals according to the QMS?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Questions about operation of the system	Response
Does the system owner regularly evaluate the compliance status (e.g., annually)? Is the review approved by the QA person?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is a report of periodic evaluation of users created? Is it approved by the QA person?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is a periodic review of the audit trail performed?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is a periodic review of user access rights performed?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are procedures in place for granting/revoking user access to the IT system described in the SOP?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is the access structure documented (user/user-group profiles) and approved by a quality-responsible person?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Has the system manager performed and documented surveillance of actual system access attempts?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is full control of the system passwords established (grant, audit trail for use), and are procedures in place?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Questions about the SOP(s) related to system operation and maintenance	Response
Is there a list of current operational manuals, guides, or similar documents?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are there identified operator prerequisites, training, education, privileges? Are they documented?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is there a log of users, major changes, problems, and any observations of the continuing safe use of the system?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is there an SOP for system operation and maintenance?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is there an SOP for handling changes in the system?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is there an SOP for configuration management of the system?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is there an SOP for system backup and recovery?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Is there a contingency, disaster, and recovery plan?	<input type="checkbox"/> Yes <input type="checkbox"/> No