Veeva

Vault CRM Text Monitoring Agent

Saying Yes to Free Text in CRM: A Guide for Legal and Compliance Stakeholders in Life Sciences

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Why this guide?

This guide is for legal and compliance professionals in the life sciences industry who have suddenly been asked by the business: "Can we put free text call notes in Vault CRM?" After years of internal agreement that it's not worth the litigation and enforcement exposure, this guide is intended to help you understand why your colleagues are asking to put free text back on the table and what to consider in a contemporary assessment of free text inside Vault CRM.

The life sciences industry is at a compliance crossroads with field documentation. For roughly two decades, the industry has been restricting free text entry in CRM systems. What began as a reasonable risk mitigation strategy has become a constraint on field productivity—and, paradoxically, a compliance gap in its own right, leaving notes scattered across individual applications that cannot be effectively monitored.

With Vault CRM, we can do better. Advances in artificial intelligence have fundamentally changed how we can oversee and extract value from free text. Large language models (LLMs) can now read, interpret, and evaluate unstructured text with consistency and speed that would be impractical for human reviewers. This creates a two-fold opportunity:

- Use Vault CRM Text Monitoring Agent to safely restore free text capabilities for field teams, confident that documentation entering the system of record is being proactively screened against relevant compliance standards.
- Get significant business value from what field users write. As the Veeva Business Consulting team has reported, unstructured notes contain rich, contextual information about customer interactions that structured picklist data cannot capture. That information is increasingly valuable when combined with AI-driven analytics.

This guide explains why the old strategy of restricting free text no longer serves organizations well, what Text Monitoring Agent is designed to do, and how it supports a field experience that is both more functional and more compliant. Before reading the guide, you may find it helpful to familiarize yourself with the end user experience on Flightpath.

We recognize that each organization has unique needs and risk tolerances, and that decisions about CRM configuration require input from legal, compliance, and IT teams. This guide is provided for informational purposes only and is not a substitute for legal advice tailored to your organization. Please do not hesitate to reach out if you have questions or would like to discuss configuration options.

Thank you,

Jenny Stohlmann, RAC
Senior Product Manager, CRM

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Why did pharmaceutical companies restrict free text in CRM?

Following the widespread adoption of electronic SFA and CRM tools in the mid-2000s, pharmaceutical legal and compliance decision makers began limiting the free text fields available to field users in systems of record like Vault CRM. The strategy was motivated by legitimate concerns: user-generated call notes and narrative documentation could be used as evidence against companies in government enforcement actions and private litigation.

Picklist-heavy layouts reduced the risk of incriminating or ambiguous written records. For compliance departments with limited monitoring bandwidth, restricting free text also reduced the volume of records requiring review. In the enforcement environment of that era, these were defensible business decisions.

What were the unintended consequences of this approach?

The strategy produced significant unintended consequences for field team productivity and, ultimately, compliance itself. Call page layouts became dominated by structured data—picklists, dropdowns, and checkboxes—with little or no room for users to document the context, content, or outcomes of their engagements. The field experience in CRM became increasingly cumbersome and disconnected from the way people actually work.

Without adequate space for narrative documentation in CRM, field users increasingly turned to other tools: personal notes applications, calendar entries, email drafts, and other unsanctioned systems. This outcome is counterproductive from a compliance perspective. Documentation that exists outside of CRM remains discoverable and is expected to be subject to oversight by compliance departments. Scattered documentation is harder to monitor and harder to defend.

The practical impact on end users was also substantial. Sales representatives and medical affairs professionals deserve tools that support efficient planning and documentation. Heavily restricted CRM layouts have resulted in reluctant user adoption, pushed teams to use workarounds, and denied organizations valuable data about field activities.

Is documentation that exists outside of CRM subject to compliance oversight?

Yes. For example, the US Department of Justice (DOJ), HHS Office of Inspector General (OIG) and other enforcement bodies have made clear through corporate integrity agreements (CIAs), settlement agreements, and compliance program guidance that pharmaceutical companies are expected to exercise oversight over field team activities and documentation—regardless of where that documentation lives.

The DOJ's guidance on effective compliance programs emphasizes the importance of systematic monitoring and auditing. If a representative documents a customer interaction in a different notes application because CRM does not support that use case, that record may still be discoverable in litigation or a government investigation. A company cannot reduce its compliance exposure simply by making its own system of record less functional.

Pushing documentation outside of CRM does not eliminate the documentation—it makes it harder to oversee and creates the kind of audit gaps that regulators and enforcement bodies expect companies to close. Consolidated, monitored documentation in a validated system of record is always preferable to fragmented records stored across local devices and unknown applications.

What business value does enabling free text in CRM unlock?

Field notes are among the richest data assets a pharmaceutical commercial or medical affairs organization generates. When field representatives document what was discussed with an HCP—including the topics covered, the questions raised, and the HCP's reactions—that information has significant analytical value for market access teams, medical teams, brand teams, and senior leadership.

Structured picklist data can tell you that a call occurred and what product was discussed. Narrative notes can tell you what the HCP is thinking. As AI-driven analytics tools become more capable of processing and synthesizing unstructured text, the strategic value of capturing that text in CRM becomes correspondingly greater.

- Better user experience: Representatives can document engagements in natural language, including context and nuance that structured fields cannot capture.
- Voice and dictation compatibility: Free text fields are essential for voice-to-text and AI dictation workflows, which are increasingly important for field efficiency.
- AI-powered insights: Notes can be analyzed to surface HCP sentiment, unmet needs, common objections, and field trends—insights that are unavailable from picklist data alone.

Text Monitoring Agent makes this value accessible to compliance-conscious organizations. It creates the guardrails that allow companies to say yes to free text—and to the business intelligence it enables.

What is Vault CRM Text Monitoring Agent?

Vault CRM Text Monitoring Agent is an AI-powered screening feature that evaluates user-entered text in Vault CRM before it is saved to the system of record. It uses a large language model to analyze the content of free text fields and identify entries that may present compliance risk or that should be directed to a different system or channel.

Text Monitoring Agent is designed to be a supportive tool for field users, not a punitive one. Years of training against free text have made many representatives cautious about what they write in CRM. Text Monitoring Agent is intended to give those users confidence: it is there to catch the things that should not be in call notes and remind them of their training in data privacy, safety reporting, and acceptable use policies to document their work appropriately.

When the agent identifies a concern, it alerts the user by highlighting the text and, where applicable, directs them to the correct channel. Nothing is silently suppressed. The goal is good hygiene in documentation practices—keeping notes consolidated in CRM where they can be monitored by compliance teams and leveraged for business analytics, rather than scattered across fragmented personal systems.

How does Text Monitoring Agent screen notes?

Text Monitoring Agent screens notes across several categories, each tied to a specific compliance risk or business process requirement. The out-of-the-box screening categories were selected because they represent the most universal and consequential documentation risks in CRM call notes:

- Protected Health Information (PHI) and Personally Identifiable Information (PII): Data that should never appear in unencrypted, broadly accessible CRM fields—protecting patient and HCP privacy.
- Adverse events and product quality complaints: Information that belongs in a dedicated pharmacovigilance or quality management report, not a call note—ensuring that safety obligations are met through the right channel.
- Off-label: Questions about unapproved uses that should be documented in a Medical Inquiry and routed to Medical Information or Medical Affairs, not buried in a sales note.
- Inappropriate and profane content: Language that has no place in the workplace or a system of record that is shared across teams and subject to legal discovery.
- Restricted and not-allowed products: Vault CRM's existing configurable business logic for restricted and not-allowed detail products is replicated in the free text analysis, maintaining consistency for end users.

These categories reflect a core principle: The agent does not suppress or cover up documentation. It halts data privacy leaks, redirects documentation to the appropriate system, and supports users in following established business processes. The result is a cleaner, more defensible system of record—with notes that are consolidated in the CRM rather than dispersed across personal tools.

How does Text Monitoring Agent protect patient and HCP privacy?

Field representatives sometimes encounter situations where patient information surfaces during an HCP engagement. A physician may mention a patient's diagnosis, a side effect one of their patients experienced, or other identifying clinical details. Even when incidental, entering patient information into a CRM free text field creates a data privacy compliance risk if that field is not appropriately protected.

Text Monitoring Agent screens free text entries for language that may contain PHI or PII before the record is saved. When a potential privacy issue is identified, the agent alerts the user and can prevent the record from being saved until the text is revised. This guardrail is especially valuable as voice-to-text and dictation tools become more widely used in the field—natural spoken language is more likely than typed notes to include incidental personal details.

When it comes to data privacy, an ounce of prevention is worth a pound of cure. This capability allows organizations to enable rich field documentation without accepting elevated privacy risk. It provides a practical safety net in addition to the training you already provide.

What about adverse events and product quality complaints?

Regulatory authorities require pharmaceutical companies to have systems for detecting, evaluating, and reporting adverse events (AE) and product quality complaints (PQC). These obligations extend to information that reaches the company through any channel, including field representatives. When an AE or PQC is documented in a CRM call note rather than in the appropriate pharmacovigilance or quality system, the company may have a reporting obligation it is unaware of—and a compliance gap in its safety program.

Text Monitoring Agent identifies language that suggests an AE or PQC may have been encountered. When such language is detected, the agent does not simply block the note. It alerts the representative to the concern, explains why the content should be reported through a dedicated safety or quality channel, and directs them accordingly. If configured to do so, it can prevent the note from being saved until the AE or PQC has been seen with a link to the safety reporting system and removed from the note.

The same thinking applies to off-label information. When an HCP asks about a use that is outside the product's approved labeling, that question belongs in a Medical Information or Medical Affairs workflow—not in a sales call note. Text Monitoring Agent can highlight off-label information, so the representative remembers to create a Medical Inquiry correctly, supporting both compliance and appropriate scientific exchange. Medical Inquiries can be created directly from the call report today and do not require a link to an outside system.

How does Text Monitoring Agent promote a respectful workplace?

Documentation in a system of record reflects the culture and conduct standards of the organization. Notes that contain profane, harassing, or demeaning language about colleagues, customers, or patients create legal exposure under employment law and anti-discrimination laws—and significant reputational risk if they are ever disclosed in litigation, an inspection, or a public proceeding.

Text Monitoring Agent screens for inappropriate content in real time. This is not intended to surveil individual employees, but to establish a consistent standard for the company's system of record. Like an automated content filter on a shared communication platform, it creates a lightweight but effective guardrail at the point of entry—well before a compliance reviewer or adverse discovery event could surface the content.

Organizations that demonstrate proactive enforcement of professional documentation standards are in a stronger position in employment disputes, regulatory inspections, and any proceeding that scrutinizes the content of CRM records.

How does this reduce the burden on compliance monitoring programs?

Retrospective monitoring programs in the pharmaceutical industry have long been challenged by volume. Reviewing call notes and other field documentation manually is resource-intensive, and compliance departments are often under-resourced relative to the size of the field forces they support. The traditional response to this problem—limiting what users could enter in the first place—reduced the monitoring burden by reducing the amount of documentation, but at the cost of functionality and the business value of field insights.

Text Monitoring Agent offers a more functional approach. By screening text at the point of entry, it prevents non-compliant documentation from reaching the system in the first place. Compliance reviewers are not looking for needles in a haystack of past records—they are overseeing a curated system in which the most common documentation errors have already been caught and corrected at the source.

This approach supports a risk-based monitoring model consistent with guidance on effective compliance programs. Rather than reviewing everything after the fact, compliance teams focus their attention on substantive oversight and exception-based investigation. Text Monitoring Agent creates documented evidence that real-time monitoring and detection capability is in place and functioning.

What visibility does Text Monitoring Agent provide for compliance teams?

One of the longstanding challenges with field documentation is the gap between what happens in the field and what compliance teams can see. Restricting free text reduced compliance teams' visibility rather than improving it—there was simply less to monitor, and what existed outside CRM was effectively invisible.

Text Monitoring Agent creates a new kind of transparency. Because it screens text at the point of entry, it generates a structured log of what was flagged, why, and how the user responded. This data can be used to identify patterns and trends, support risk-based monitoring decisions, and inform training priorities. Compliance teams gain visibility not just into what field users documented, but into what the system detected and how issues were resolved.

This is the kind of proactive, data-driven oversight that mature compliance programs require. It shifts documentation monitoring from a reactive process to a systematic, real-time capability—and generates the kind of documented evidence that demonstrates a functioning compliance program to regulators and enforcement bodies.

Summary

The strategy of restricting free text in pharmaceutical CRM systems was a reasonable response to the enforcement environment of the early 2000s. Today, it has run its course. The compliance tools available to organizations have advanced significantly, and the expectation that field documentation—wherever it lives—is subject to oversight means that limiting CRM functionality no longer reduces exposure in any meaningful way. It only reduces the business value of the system and drives documentation into harder-to-monitor channels.

Vault CRM Text Monitoring Agent offers a better path forward. It allows organizations to restore consequential free text capabilities for their field teams while maintaining proactive, automated compliance oversight at the point of entry. The agent is designed to support users—not punish them—by catching the information that should not be in call notes before it enters the system and directing it to the right place. PHI/PII stays out of unencrypted fields. Adverse events get reported through the right channel. Off-label inquiries reach Medical Information. Inappropriate language does not become a record.

The result is a system of record that is more functional for field users, more defensible for compliance teams, and more valuable for the business. Notes consolidated in CRM can be monitored, analyzed, and mined for insights in a way that scattered, fragmented documentation could never be.

Veeva is committed to providing life sciences organizations with tools that reflect the current regulatory and technology landscape. Text Monitoring Agent is designed to help legal and compliance stakeholders say yes to a better field experience—with the confidence that the documentation coming out of Vault CRM meets their standards and creates the visibility their programs require. Please reach out to your Veeva Account Partner if you have questions or would like to discuss configuration options for your organization.

Appendix:

Screening Categories

The table below summarizes the out-of-the-box screening categories available in Vault CRM Text Monitoring Agent, what each category detects, and how the agent responds. The agent assesses based on regulatory obligations most relevant to the category in the country in which the interaction takes place—there is no global legal research project required to enable the agent. The Corporate Compliance category is configurable via plain language instructions to accommodate organization-specific policies and risk profiles. Corporate Compliance category is additive to the other out-of-the-box screening categories.

Screening Category	What the Agent Detects	How the Agent is Grounded (US Example)	How the Agent Responds
Protected Health Information (PHI) / Personally Identifiable Information (PII)	Personal health or identifying information entered into unencrypted free text fields—including information like names, birthdates, identifying case details, and clinical information about identifiable individuals as defined by local regulations	No Personally Identifiable Information per Staff Manual Guide 3297.4 and OMB Circular No. A-130; No Protected Health Information per HIPAA Safe Harbor §164.514(b)	Alerts user in real time; configurable to prevent save until identifiable data is de-identified or removed from the note
Adverse Events (AEs) and Product Quality Complaints (PQCs)	Language indicating a patient or HCP experienced an unexpected or undesirable reaction, clinical event, or health outcome potentially associated with a company product; Language indicating a product defect, contamination concern, labeling error, packaging issue, or other quality event affecting a company product	No Adverse Events (AEs) as defined in 21 CFR 314.80 and 21 CFR 310.305 for drugs, and 21 CFR Part 803 for medical devices; No Serious Adverse Events (SAEs) as defined in 21 CFR 314.80 for drugs and 21 CFR Part 803 for medical devices; No Product Quality Complaints (PQCs) as defined in 21 CFR 211.198 for drugs and 21 CFR Part 820 for medical devices	Alerts user in real time to report through the pharmacovigilance system; configurable to provide a link to the appropriate reporting system and prevent save until the AE or PQC is removed from the note
Off-Label Information	Language indicating an HCP has asked about an unapproved use, indication, dosing, or patient population outside the product's approved labeling	Claims must be consistent with the date-versioned Prescribing Information (RAG-assisted) Reference Title 21 CFR and current FDA Guidance documents; Special considerations for combination products, comparative claims, clinical trial discussions, etc.	Alerts user in real time; configurable to prevent save until the off-label information is removed from the note; Medical Inquiries can be created directly from the call report's action menu

Screening Category	What the Agent Detects	How the Agent is Grounded (US Example)	How the Agent Responds
Inappropriate / Profane Content	Profane, harassing, discriminatory, or otherwise inappropriate language	Baseline content filters from the LLM; Rules listed in the company-specific Corporate Compliance Document(s) (RAG-assisted)	Alerts user in real time; configurable to prevent save until content is revised or removed
Restricted and Not-Allowed Products	Company detail products that are restricted and/or not allowed for accounts on the call	End user's My Setup Products and the accounts' restricted/allowed product data	Alerts the user in real time if company products mentioned in the note violate existing business logic for Restricted and Allowed Product features; configurable to prevent save until content is revised or removed
Corporate Compliance	Company-specific rules listed in plain language documents configured in the Vault	Rules listed in the country- and/or product-specific Corporate Compliance Document(s) (RAG-assisted)	Alerts the user in real time; configurable to prevent save until the text is revised or removed