

藥品臨床試驗計畫書主要審查事項

一、前言

世界各醫藥先進國家，為確保上市藥品之安全及有效性，均明文規定，應有足夠之動物藥理、毒理、安全性試驗及人體臨床試驗資料為依據，證明該藥品安全及療效後始得核准上市。為使人體試驗可在保障受試驗者之權益下執行，於民國七十五年十一月二十四日公佈施行之醫療法中即明定人體試驗應遵守事項，其中該法施行細則規定人體試驗計畫，教學醫院應提經有關醫療科技人員、法律專家及社會工作人員會同審查通過並報請中央衛生主管機關核准始可執行。教學醫院即依此成立人體試驗（倫理）委員會（Institutional Review Board, or Ethics Committee），專職人體臨床試驗案之審核。本署則由藥政處之藥物審議委員會及財團法人醫藥品查驗中心負責藥品臨床試驗案之審核。

因應八十二年三月中美保護智慧財產權諮商會議，本署藥政處於八十二年七月七日公告新藥安全監視制度，規定新藥查驗登記須檢附國內臨床試驗報告，作為藥品查驗登記審核之依據。八十五年本署公告「藥品優良臨床試驗規範（Good Clinical Practice）」，八十六年行政院公佈「加強生物技術產業推動方案」，本署配合推動方案，除訂定各項新藥研發臨床試驗基準、協助成立聯合人體試驗委員會、簡化藥品臨床試驗計畫案審查流程、成立財團法人醫藥品查驗中心及健全臨床試驗相關法規，凡此皆使我國之臨床試驗蓬勃發展。

目前教學醫院自提出臨床試驗計畫案之申請，需花費一至三個月時間始核准通過；人體試驗委員會如何提高審查效率、並確保臨床試驗符合相關法規、受試驗者之權益獲得保障，為一重要議題。為加速新藥臨床試驗之審查，本署積極修訂「醫療法施行細則」，將臨床試驗須經醫院人體試驗委員會審核通過再送署審查之作業流程，修改為可平行送審（至本署與醫院人體試驗委員會）之作業方式，而所衍生之相關問題，如本署與人體試驗委員會如何維持臨床試驗計畫案審查之一致性，亦是另一重要議題。為使醫院人體試驗委員會與本署之審查標準一致化、提昇審查及行政效率，並兼顧臨床試驗之科學性與倫理考量，本署特訂定「藥品臨床試驗計畫書主要審查事項」，以做為審查藥品臨床試驗計畫書之依據。

二、藥品臨床試驗計畫書主要審查事項

人體試驗委員會之審查應以試驗之安全性為主要考量，試驗之設計應以達到預期療效指標為主。

(一) 試驗計畫書主要應載明事項：

Yes	No	主 要 載 明 事 項
一般資訊 (General information)：		
		1.計畫書之名稱、編號及日期 (Protocol title, identifying number, and date)
		2.委託者及監測者之姓名與地址 (Name and address of the sponsor and monitor)
		3.負責簽署計畫書者(包括主持人及委託者)之姓名與職稱(Name and title of the person (investigator and sponsor) to sign protocol)
		4.委託者之名稱、職稱、地址與電話號碼 (Name, title, address, and telephone number of sponsor)
		5.計畫主持人之姓名及頭銜 (Name and title of the investigator)
		6.其他參與試驗之醫師姓名、職稱、地址與電話號碼(Name, title, address, and telephone number of qualified physician)
		7.試驗醫療單位之名稱與地址 (Name and address of medical department)
背景 (Background information)：		
		8.試驗藥品之敘述 (Description of investigational product)
		9.相關臨床試驗結果摘要 (Summary of findings from relevant clinical trials)
		10.給藥方式與治療期間 (Dosage regimen, and treatment period)
		11.優良臨床試驗規範及相關法規之遵守 (Compliance with protocol, GCP and applicable requirement)
		12.受試族群之敘述 (Description of the population to be studied)
		13.參考文獻與資料 (References to literature and data relevant to the trial)
試驗目的 (Trial objectives and purpose)：		
		14.試驗目的 (Description of the objectives and the purpose to the trial)
試驗設計 (Trial design)：		
		15.主要療效指標與次要療效指標的描述 (Statement of primary endpoints and the secondary endpoints)
		16.試驗設計的描述 (Description of the type/design of trial to be conducted)
		17.減低試驗誤差的方法：例如隨機分配與雙盲設計 (Description of the measures taken to minimize/avoid bias including randomization blinding)

		18.試驗藥品之劑量及給藥方式 (Dosage and dosage regimen of the investigational product)
		19.病患參與試驗的時間 (Expected duration of subject participation)
		20.隨機分配密碼的維持和解除密碼程序 (Maintenance of trial treatment randomization codes and procedures for breaking codes)
受試者的選擇及退出 (Selection and withdrawal of subjects):		
		21.受試者納入及排除條件 (Subject inclusion/exclusion criteria)
		22.受試者停止用藥及退出試驗條件 (Subject stopping rules, discontinuation criteria, and withdrawal criteria)
給藥及處置方式 (Treatment of subjects):		
		23.試驗前及試驗期間禁止使用的藥品 (Medication prohibited before and/or during the trial)
		24.詳細給藥及處置方式 (Treatment to be administered)
		25.試驗前及試驗期間准許使用的藥品 (Medication permitted (including rescue medication) before and/or during the trial)
療效評估 (Assessment of efficacy):		
		26.明列療效參數 (Specification of the efficacy parameters)
		27.評估、紀錄、和分析療效參數之方法及時間點 (Methods and timing for assessing, recording and analyzing of efficacy parameters)
安全性評估 (Assessment of safety):		
		28.評估、紀錄、和分析安全性參數之方法及時間點 (Methods and timing for assessing, recording and analyzing safety parameters)
		29.明列安全性參數 (Specification of safety parameters)
		30.試驗期間發生的不良反應及其他疾病 (Adverse event and intercurrent illnesses)
		31.受試者於不良反應發生後之追蹤時間(Duration of the follow-up of subjects after adverse events)
統計 (Statistics):		
		32.試驗採用的統計分析方法, 包括分析的時間點及是否執行期中分析等(Statistical methods to be employed, including timing and planned interim analysis)
		33.試驗預計納入的人數, 及其採用依據 (Number of subjects planned to be enrolled, reason for choice of sample size)
		34.決定統計檢定的顯著水準 (Level of significance to be used)
		35.終止試驗的條件 (Criteria for termination of the trial)
		36.受試者納入分析的選擇(Selection of subjects to be included in the analyses)

(二)、受試同意書主要應載明事項：

受試同意書之敘述應口語化，且應予試驗計畫書一致，亦不應誇大試驗用藥之療效

Yes	No	主 要 載 明 事 項
		1.該藥品目前研發情形(Worldwide regulatory status should be described)
		2.二十四小時聯絡人及電話號碼(Name and phone number of 24 hour contact person)
		3.試驗藥已知常見的副作用及少見但後果嚴重之副作用及發生率(Common side effects and incidence should be described)
		4.描述應口語化(Use of colloquial description)
		5.試驗藥使用方法(How and when to take the study drug should be described)
		6.嚴重不良反應發生時廠商的責任(Compensation and/or treatment in case of trial-related injury should be described)
		7.試驗受試病人數目(Patient number should be described)
		8.疾病常用及其他的治療方法(Usual treatment and alternative therapy should be described)
		9.病人應有的權利(Patient's right (ask questions and withdraw) should be described)
		10.何種情況下病人可退出試驗(Withdrawal criteria should be clearly described)
		11.自願性之參與，受試者可隨時退出試驗(Participation is voluntary and subject may withdraw at any time)
		12.禁止的合併用藥(Prohibited concomitant medication should be described)
		13.預期的危險(Foreseeable risks to the subject and, when applicable, to an embryo, fetus, or nursing infant)
		14.試驗資料機密性(Confidentiality should be described)
		15.和試驗計畫書不應有出入(Should be consistent with protocol)
		16.試驗目的(Purpose of trial should be described)
		17.試驗為期多久(Trial duration should be defined)
		18.不可誇大試驗藥的療效(Should not exaggerate efficacy of study drug)
		19.重要的排除/納入標準(Important exclusion/inclusion criteria should be clearly described)
		20.預期的醫療福祉(Reasonably expected benefits should be described)
		21.受試者責任(Subject's responsibilities should be described)
		22.預期可獲得的酬勞(Anticipated prorated payment should be described)
		23.預期支付的費用(Anticipated expenses should be described)
		24.試驗中所接受的治療(Trial treatment should be described)

		25.治療及處置方式(Trial procedures to followed, including all invasive procedures)
		26.資料可被監測者、稽核者、人體試驗委員會、政府查核者檢視(Monitor, auditor, IEC, and regulatory authority granted direct access to subject's records)
		27.有新資訊會隨時通知受試者(Subject informed in a timely manner if relevant information becomes available)

註：除上述主要應載明事項，試驗計畫書應根據 ICH E6 Good Clinical Trial 之事項逐一詳列，本署將依據此查檢表審查臨床試驗計畫書。