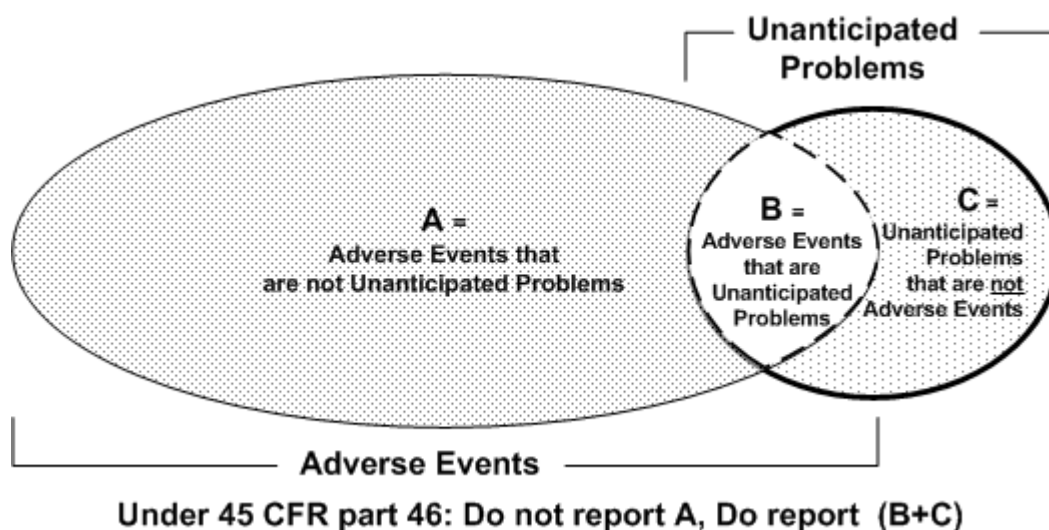


人體試驗委員會 臨床試驗案未預期事件(Unanticipated Problems ; UP)

通報須知

根據藥品優良臨床試驗準則第一百零六條修正草案、美國 OHSP 關於未預期事件(Unanticipated Problems ; UP)之通報及審查指引，以下 B 及 C 範圍之事件需通報 IRB，A 範圍為預期或不相關之事件，不用通報至 IRB。



圖一

本院通報範圍：非預期且可能相關之不良事件

一、內部 (本院)發生之 UP

(1) B：非預期且可能與藥品(Study drug)/研究程序(procedure)相關之不良事件 (Unanticipated Problems /AE or SAE)。(範例二)

(2) C：非預期且與藥品(Study drug)/研究程序(procedure)無關，但可能危及、影響受試者或其他人員之相關事件(Unanticipated Problems/non-AE) (範例一)

二、外部 (國內他院及國外)發生之 UP，SUSAR、DSMB 以 Summary report 方式通報至 IRB。

三、預期或與藥品(Study drug)/研究程序(procedure)不相關之事件，不用通報至 IRB。

通報流程圖：

| 編號 | 作業內容 | 負責人員 |
|----|--------------------------------------|----------|
| 1 | 判斷是否為 UP(非預期且可能相關之不良事件)(參考圖一、二) ↓ | 計畫主持人 |
| 2 | 受理「UP」通報文件 ↓ | IRB 審查藥師 |
| 3 | 初步評估(審查前置作業) | IRB 審查藥師 |

| | | |
|---|--------------------------|---------------------|
| | ↓ | |
| 4 | UP/AE/SAE 及安全性報告之審查 ↓ | 醫師委員 |
| 5 | IRB 會議 ↓ | IRB 主席/委員/ IRB 審查藥師 |
| 6 | 審查結果 ↓ | IRB 審查藥師 |
| 7 | 歸檔 | IRB 審查藥師 |

通報時效：優良臨床試驗準則 GCP 106 條

- **死亡或危及生命**之未預期嚴重藥品不良反應：於獲知日起**七日**內通報主管機關及人體試驗委員會，並在獲知日起**十五日**內提供詳細書面資料。
- **死亡或危及生命以外**之未預期嚴重藥品不良反應，應於獲知日起**十五日**內通報主管機關及人體試驗委員會，並提供詳細書面資料。

通報文件 (請上 IRB 網站「相關表格」→「UP 通報」查詢

http://www2.cch.org.tw/IRB/Table_01.aspx?ImgType=1)

內部(internal) Unanticipated Problems /AE/SAE

- 臨床試驗內部(internal) UP 通報摘要表
- 衛生署藥物不良反應通報表，僅通報 SAE 時需檢附。
- 『全國藥物不良反應通報中心簽收』之通報回函
- 財團法人彰化基督教醫院人體試驗委員會臨床試驗 UP 通報回函
- 病歷摘要
- 個案報告表
- 若為死亡案件須另檢附衛生署『藥品臨床試驗死亡通報案件之後續處理追蹤表』

外部(external)

臨床試驗外部(external)SUSAR 及 DSMB 通報摘要表

名詞解釋

未預期事件 (unanticipated problems ; UP)：符合以下 3 個條件

- (1) 非預期(**Unexpected**)：根據計畫書(study protocol)/主持人手冊(investigator brochure)/ 藥品仿單(product monograph)/受試者同意書(Informed Consent Form)判斷，以上資料有紀錄之不良反應稱之為預期，未記載的事件則歸類為非預期

- (2) 可能相關(related or possibly related to participation in the research (in this guidance document, *possibly related* means there is a reasonable possibility that the incident, experience, or outcome may have been caused by the procedures involved in the research); and
- (3) 嚴重或對受試者及其他研究人員的傷害(身體、心理、經濟及社會層次)超過已知的風險 either serious or place subjects or others at a greater risk of harm (including physical, psychological, economic, or social harm) than was previously known or recognized

不良事件(Adverse Event ; AE)：受試者參加試驗後所發生之任何不良情況。此項不良情況與試驗藥品間不一定有因果關係。

嚴重不良事件(Serious Adverse Event ; SAE)：因試驗致發生下列反應者：死亡、危及生命、導致病人住院或延長病人住院時間、永久性殘疾、導致胎兒先天性畸形、其他可能導致永久性傷害需作處置者。

內部事件(internal event)及外部事件(external event)：在本院人體試驗委員會核准並進行收案，其受試者發生的事件稱之內部事件。其他為外部。

疑似非預期嚴重不良反應(Suspected Unexpected Serious Adverse Reaction ; SUSAR)。

獨立數據監測委員會(Data and Safety Monitoring Board ; DSMB)：試驗委託者設立的獨立數據監測委員會，用來定期評估試驗進度、安全性數據與重要的療效指標，並建議試驗委託者是否繼續、修正或停止試驗。

範例一：危及受試者或研究人員之未預期事件

Examples of Unanticipated Problems Involving Risks to Subjects or Others

(Unanticipated Problems/**non-AE**):

- (1)有可能暴露受試者或隱私之事件，例如計畫主持人手提電腦被竊、或病歷遺失導致醫療及研究資訊外洩。A breach in confidentiality that involves risk to that individual or others, such as a PI's laptop is stolen or medical chart is lost, and it contains identifiable medical information and research data about subjects;
- (2)研究團隊無法解決之受試者之抱怨，可能因此增加潛在風險。Subject complaints that cannot be resolved by the research team or which indicate increased or unexpected risks;
- (3)可能因增加風險及影響受試者利益，而改變計畫書的任何意外事件。Any accidental or unintentional change to the IRB-approved protocol that increases risk or decreases benefit, affects the subject's rights, safety, welfare, or affects the integrity of the resultant data;
- (4)研究技術員因研究期間不慎暴露於放射線。If a researcher technician is inadvertently exposed to a low level of radiation during a study.

範例二：未預期之不良事件

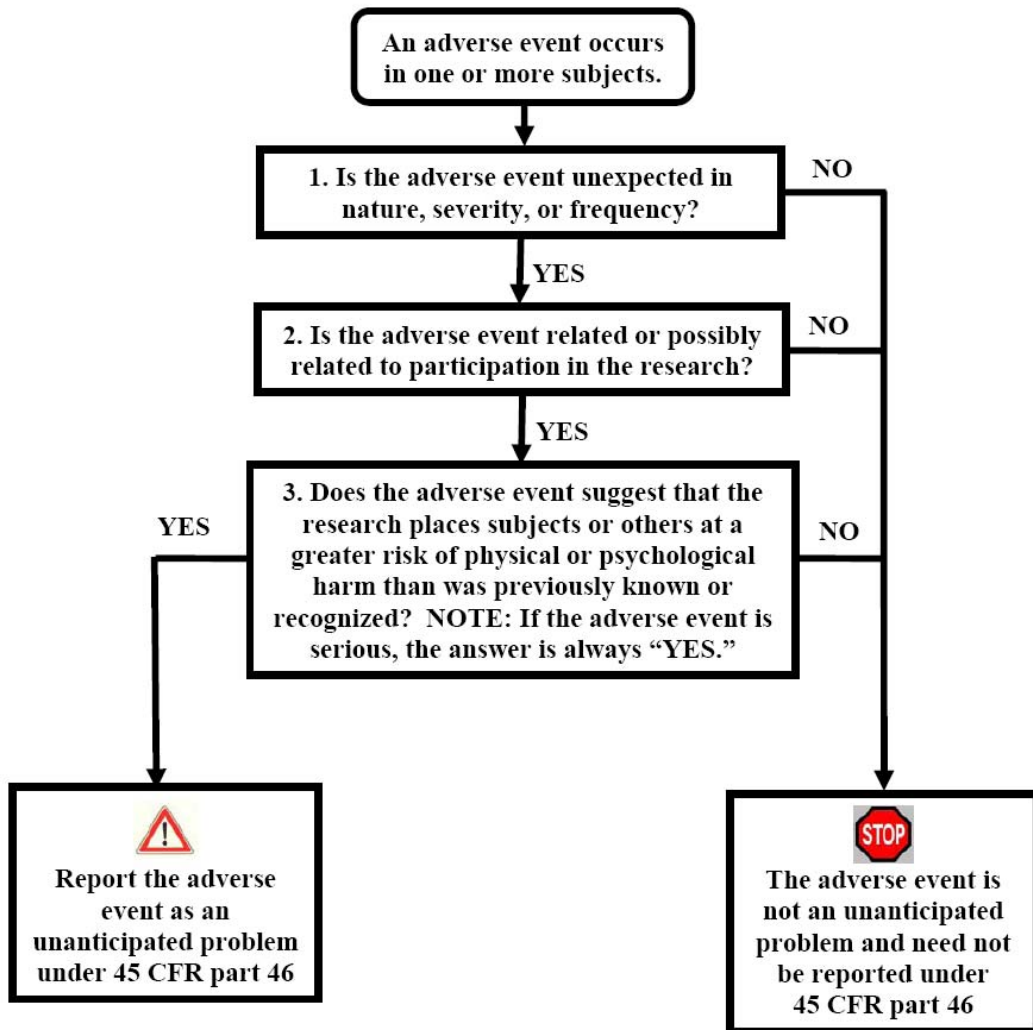
Examples of Adverse Events that are Unanticipated Problems (Unanticipated Problems/AE)

- 嚴重、非預期的單一事件，其為罕見且與藥品相關。(例如血管水腫、顆粒性白血球、肝臟損傷、史蒂文生症候群)A single occurrence of a serious, unexpected event that is uncommon and strongly associated with drug exposure (such as angioedema, agranulocytosis, hepatic injury, or Stevens-Johnson syndrome).
- 預期嚴重之不良事件(已描述於主持人手冊計畫書或受試者同意書)，但其發生率明顯超過預期。需報告其相異於預期發生率之原因。 A serious AE that is described or addressed in the investigator's brochure, protocol, or informed consent documents, but for which the rate of occurrence in the study represents a clinically significant increase in the expected rate of occurrence (ordinarily, reporting would only be triggered if there were a credible baseline rate for comparison). We recommend that a discussion of the divergence from the expected rate accompany the report.
- 任何可能改變計畫書或受試者同意書之不良事件或安全性報告。 Any other AE or safety finding (e.g., based on animal or epidemiologic data) that would cause the sponsor to modify the investigator's brochure, study protocol, or informed consent documents, or would prompt other action by the IRB to ensure the protection of human subjects. We recommend that an explanation of the conclusion accompany the report.

參考資料

- (1) 優良臨床試驗準則 GCP 106 條草案 (2010 年 4 月 28 日)
- (2) Guidance on Reviewing and Reporting Unanticipated Problems Involving Risks to Subjects or Others and Adverse Events. Office for Human Research Protections (OHRP) Department of Health and Human Services (HHS)(2007 年 1 月 15 日)

**Algorithm for Determining Whether an Adverse Event
is an Unanticipated Problem**



圖二