

臨床研究/試驗數據管理：流程與研究人員實務應用

Data Management in Clinical Research/Trials: From Processes to Practical Skills for Study Coordinators

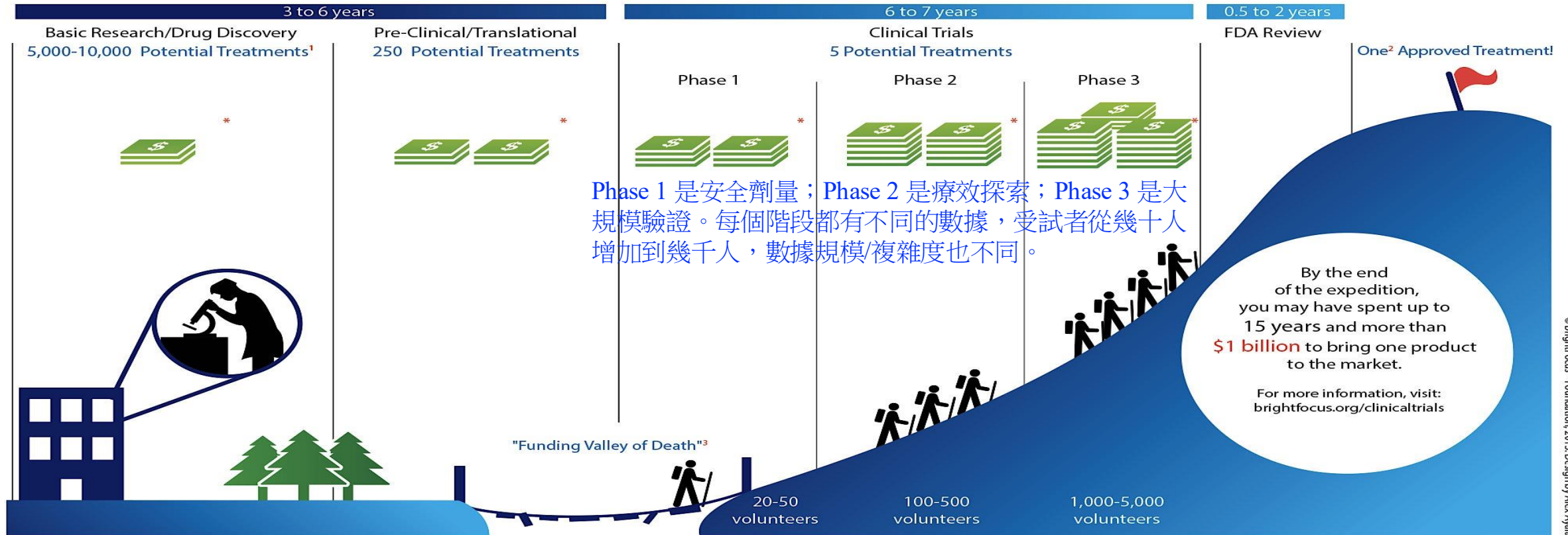
台北榮民總醫院
神經醫學中心
周希潔 研究護理師
03-JUN-2025

新藥研發歷程

An Uphill Battle

Imagine leading an expedition where every step is more difficult than the last...

The long journey begins in the lab, where scientists spend years testing thousands of ideas. Next, crossing the so-called “Funding Valley of Death” requires the resources and time needed to complete clinical trials, testing safety and effectiveness among what could end up being thousands of volunteers. At the end of this steep financial and scientific climb: Food and Drug Administration approval for a new treatment. Ultimately, it may have taken up to 15 years and more than \$1 billion to bring this treatment to the market.



¹ Although we are using the word “treatment,” clinical trials also involve medical research studies in which people participate as volunteers to test new methods of prevention, screening, and diagnosis of disease.

² After approval, the product is manufactured for sale on the market, and the process enters Phase 4 (Post-Marketing Monitoring/Clinical Trials). At this point, the FDA monitors for public safety and adverse events, and the sponsor company may begin Phase 4 Clinical Trials to obtain information about long-term effects or to test the product in special patient populations.

³ The “Funding Valley of Death” is the financial challenge many promising treatments face in having the opportunity to be scientifically tested in a clinical trial. In many cases, further financial support or partnerships are necessary to proceed.

* The cost of bringing a drug to market depends on a number of variables, but could be more than \$1 billion, including approximately \$50-840 million for Basic Research/Drug Development and Pre-Clinical/Translational research, and approximately \$50-970 million to complete all three Phases of the Clinical Trials.

臨床試驗執行與角色關係圖



ICH-GCP

- 全球公認之藥品審查標準
- 品質 (Quality)、療效 (Efficacy)、安全 (Safety) 及複合領域 (Multidisciplinary)

On the same page



How Data Management Represents a Significant **Workload** for CRN/SC(CRC) in Clinical Trials?

Database	Search Strategy
PubMed	("clinical research coordinator" OR "clinical research nurse" OR "clinical research nursing" OR "clinical trial nurse") AND ("data management" OR "data manager" OR "data entry" OR "data handling" OR "eCRF" OR "case report form") AND ("workload" OR "workforce" OR "time allocation" OR "task analysis" OR "job responsibilities")

- **Title:** 1. The role of the clinical research coordinator – data manager – in oncology clinical trials
- **Authors, publication year:** Rico-Villademoros et al., 2004
- **Research theme:** To determine the standard tasks performed by clinical research coordinators (CRCs) in oncology clinical trials.

Title: 1. The role of the clinical research coordinator – data manager – in oncology clinical trials

• **Result:**

(1) CRCs devoted to "**monitoring activities**". All standard tasks fell into this category, including:

- patient **registration/randomization**
- recruitment follow-up
- CRF completion, collaboration with the CRA
- Serious Adverse Events (SAE) reporting
- investigator file handling
- preparing the site for and/or attending audits

Administrative activities

Management of IRB submission
Management of Hospital Director submission
Management Medicine Agency submission
Medical history adaptation for the CT
Scheduled protocol specified tests
Scheduled patient's CT appointments

Clinical activities

To identify potential eligible patients
Assessment of inclusion/exclusion criteria
Participation in informing of patients
Participation in obtaining informed consent
To assess response to therapy
To assess toxicities
Scales/questionnaires completion

Monitoring activities

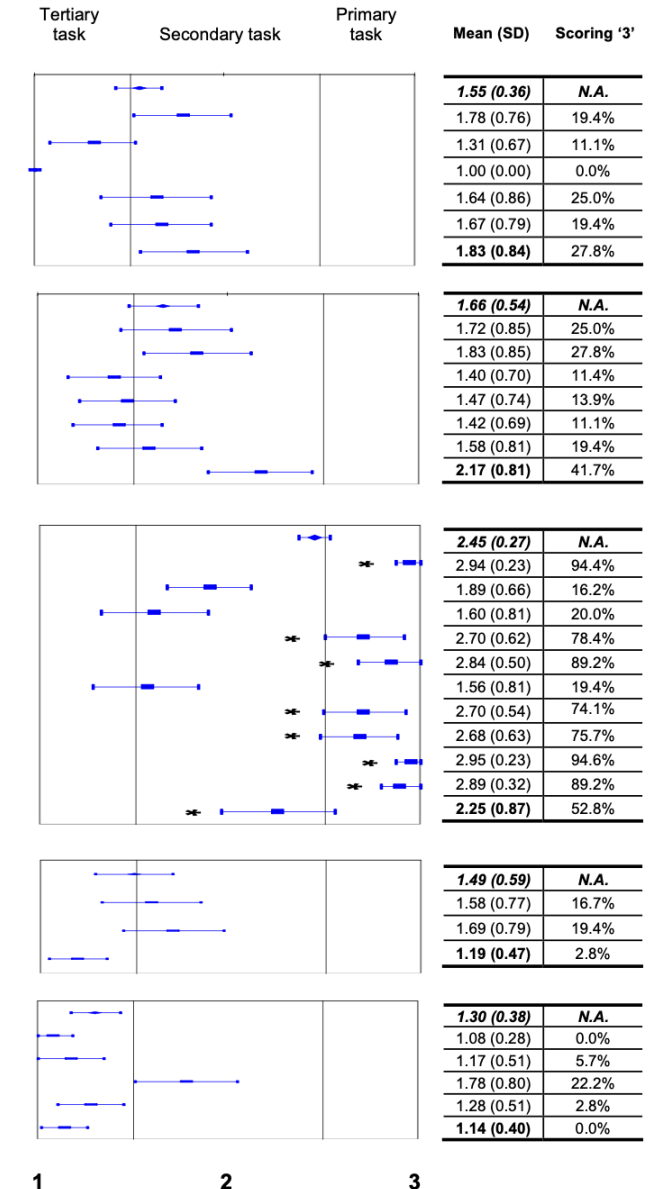
Patient registration/randomization
To deal with Hospital Pharmacy
To deal with a central lab
Recruitment follow-up
CRF completion
To act as CRA
To collaborate with the CRA
Queries resolution
Reporting serious adverse events
To handle the investigator file
To prepare and/or attend audits

Data management and statistics

Database set-up
Data entry
Statistical analysis

Researcher-related activities

Participation in protocol/CRF design
Participation in protocol/CRF review
Attending investigators meeting
Participation in Final Report
Participation in CT publication



Title: 1. The role of the clinical research coordinator – data manager – in oncology clinical trials

• **Result:**

(2) Nurses and physicians were more involved in clinical activities, like completing scales/questionnaires(e.g., therapy and toxicity assessments), compared to non-clinical background staff (P = 0.054).

100% of nurses/physicians resolved queries, while only 60.9% of CRCs from other backgrounds did the same.



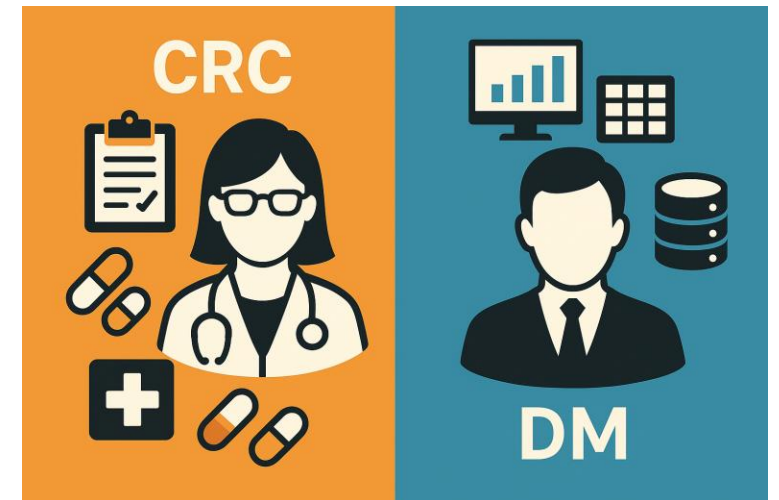
- **Result:**

(3) use job title as "**Clinical Research Coordinator**" instead of "**Data Manager**"

- data managers: dealing with data management activities (e.g., database set-up, data analysis) and usually working at a research center.
- CRC for those involved in on-site activities.

(4) CRCs more involved in Multi-National trials differ from those less involved, because pharmaceutical sponsors set higher quality standards.

CRCs' key tasks:
facilitate smooth clinical trials
and maintain data quality.



Database	Search Strategy
PubMed	("clinical research coordinator" OR "clinical research nurse" OR "clinical research nursing" OR "clinical trial nurse") AND ("data management" OR "data manager" OR "data entry" OR "data handling" OR "eCRF" OR "case report form") AND ("workload" OR "workforce" OR "time allocation" OR "task analysis" OR "job responsibilities")

- **Title:** 2. Assessment of Nursing Workload and Complexity Associated with Oncology Clinical Trials: A Scoping Review
- **Authors, publication year:** Bozzetti et al., 2024
- **Research theme:** this scoping review aims to explore the current approaches for evaluating workload (WL) in oncology CTs and identify tools for measuring clinical research nurses' WL.

Result:

(1) The complexity and workload associated with Clinical Trials can be attributed to 5 main domains:

- protocol,
- single case(patient),
- **data management,**
- regulatory
- worker-related

(2) **Differences** in Domain Proportions and the Importance of Data Management:

- **Protocol-related:** the highest proportion in most studies, reflecting the complexity of trial design and operations.
- **Variability:** The workload for data management differs by study, influenced by trial complexity, data volume, and phase.

Database	Search Strategy
PubMed	("clinical research coordinator" OR "clinical research nurse" OR "clinical research nursing" OR "clinical trial nurse") AND ("data management" OR "data manager" OR "data entry" OR "data handling" OR "eCRF" OR "case report form") AND ("workload" OR "workforce" OR "time allocation" OR "task analysis" OR "job responsibilities")

- **Title:** 3. Extending the description of the clinical research nursing workforce
- **Authors, publication year:** Fisher et al. (2022)
- **Research theme:** to determine differences in Clinical Research Nurses most frequently performed activities.

Result:

(1) Among the **56** surveyed activities, the most performed multiple times per day:

- **Monitoring study participants for potential adverse events: 187 (80.2%)**
- **Providing nursing leadership within the interdisciplinary team: 169 (72.5%)**
- **Recruitment(51.5%)**
- **Collecting study endpoint data: 100 (42.9%)**

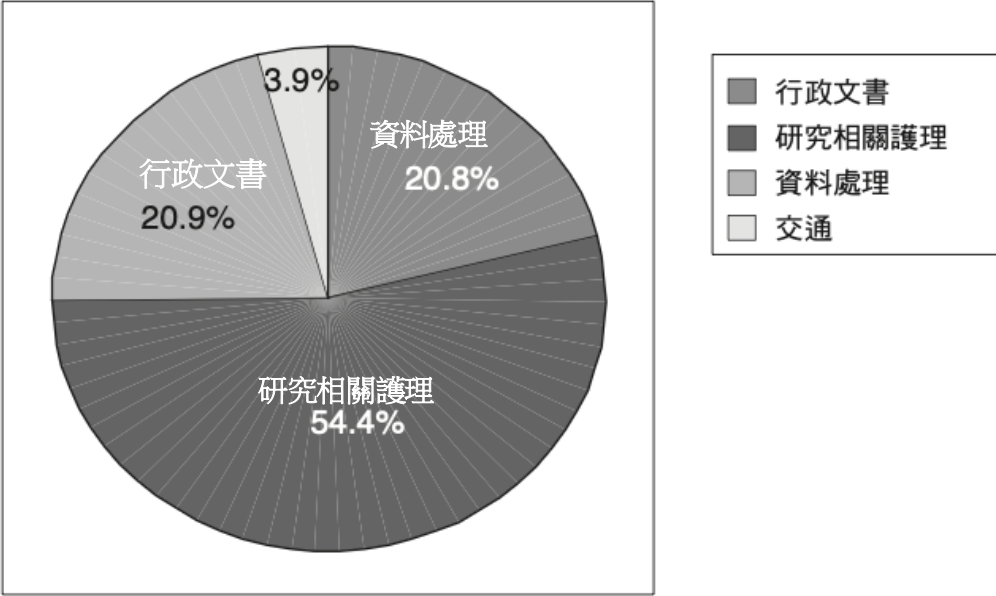
Database	Search Strategy
華藝圖書館	(("研究護理師" OR "研究護士" OR "臨床研究專員" OR "試驗護士") AND ("角色" OR "職責" OR "工作量" OR "數據管理" OR "資料處理" OR "數據處理"))

- **Title:** 4.癌症臨床試驗研究護士工作量初探 - 以TCOG為例
- **Authors, publication year:** Feng et al., (2005)
- **Research theme:** 探討台灣癌症臨床研究合作組織(Taiwan Cooperative Oncology Group, TCOG)研究護士的工作內容與工作量，確保良好試驗品質及有效資源分配。

Result:

(1) 工作時間分配佔比：

- 研究相關護理活動(54.4%)
- 行政文書工作(20.9%)
- 處理資料(20.8%)
- 交通往返(3.9%)



圖一 研究護士每日工作時間分配圖

		時間/分鐘			
		mean	max	SD	%
行政文書	資料歸檔/費用申請	26.4	165	34	5.7
	開會	14.9	155	32.4	3.2
	與TCOG中心聯繫	14.7	80	15	3.2
	相關單位聯繫	14.7	130	24.4	3.2
	填寫工作記錄	11.3	70	18	2.5
	處理電子郵件	6.3	50	10.8	1.4
	郵寄/快遞資料	4.6	60	10.5	1.0
	藥物登記點收	2.9	40	8.4	0.6
	小計				20.8
					20.9
資料處理	填寫個案報告表	67.3	290	59.7	14.6
	查詢/列印報告	19.6	80	24.1	4.2
	借調病例	5.2	80	12.8	1.1
	填寫生活品質問卷	2.6	30	7	0.6
	篩檢病理報告	1.8	55	8	0.4
	小計				20.9

(2) 行政文書工作/資料處理工作細項

- 填寫個案報告表(CRF) 14.6%
- 資料歸檔/費用申請 5.7%
- 查詢/列印報告 4.2%

Database	Search Strategy
華藝圖書館	(("研究護理師" OR "研究護士" OR "臨床研究專員" OR "試驗護士") AND ("角色" OR "職責" OR "工作量" OR "數據管理" OR "資料處理" OR "數據處理")

- **Title:** 5. 臨床研究護理師執行臨床試驗角色職責之探討
- **Authors, publication year:** 高綺吟等 (2015)
- **Research theme:** 瞭解CRNs 對其角色職責之認同、重要性與執行困難度，規劃不同層級的角色職責，有助於建立其專業發展。

Result:

CRNs 的角色職責中，「受試者保護」的認同度最高，其次依序為「研究協調與管理」、「受試者臨床照護」、「進階護理職能」。

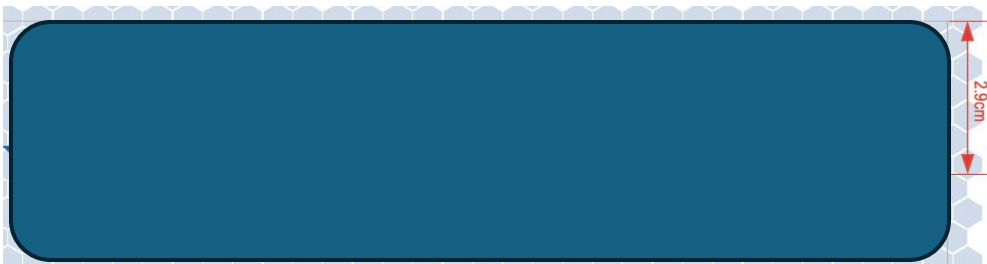
表二 對CRNs 角色職責的認同程度、重要程度與困難度之排序（續） (N = 80)

項 目	認同度			重要度			執行困難度		
	M	(SD)	排序	M	(SD)	排序	M	(SD)	排序
因素三：研究協調與管理									
27.CRN _s 應負責臨床試驗相關資料「收集」的事務	4.09	(0.49)	2	3.98	(0.52)	2	2.62	(0.71)	3
28.CRN _s 應負責填寫個案報告表 (case report form)	4.20	(0.62)	18	3.90	(0.72)	33	2.55	(0.83)	29
29.CRN _s 應確認臨床試驗相關資料「編碼」的正確性	4.28	(0.66)	14	4.05	(0.73)	23	2.54	(0.93)	32
30.CRN _s 應「確定臨床試驗相關物品（如：藥品、耗材）存放環境是否適當」	3.68	(0.88)	40	3.60	(0.76)	42	2.75	(0.86)	12
31.CRN _s 需「隨時掌握計畫案內容、與試驗主持人討論並定期開會與記錄」，以確保臨床試驗治療、照護、資料收集的品質	3.90	(0.72)	31	3.86	(0.78)	36	2.56	(0.87)	28
32.CRN _s 應「持續檢視護理專業的角色規範與發展工作品質標準」	4.16	(0.58)	21	4.08	(0.65)	20	2.63	(0.92)	21
33.「備妥臨床試驗相關文件以接受相關機構之稽核與查核」是 CRN _s 的工作職責	4.03	(0.71)	28	3.93	(0.69)	31	2.66	(0.81)	19
34.CRN _s 應「協助保存臨床試驗的相關檔案」	3.99	(0.80)	30	3.95	(0.76)	28	2.71	(0.89)	15
35.CRN _s 應「協助澄清有疑問之資料及補齊後續的訊息」	4.10	(0.77)	25	4.06	(0.68)	22	2.60	(0.89)	24
36.CRN _s 應「確認與支持臨床試驗相關的倫理議題討論」	4.19	(0.60)	19	4.10	(0.63)	18	2.60	(0.82)	24
37.CRN _s 應「參與新進 CRN _s 的在職教育」	4.13	(0.66)	23	4.01	(0.70)	25	2.63	(0.80)	21
38.CRN _s 應「協助新進 CRN _s 的適應工作」	4.24	(0.60)	15	4.14	(0.65)	16	2.58	(0.88)	27
因素四：進階護理職能									
39.CRN _s 扮演「參與」臨床試驗設計的角色	4.19	(0.60)	19	4.10	(0.63)	18	2.60	(0.82)	24
40.臨床試驗開始前，CRN _s 應「參與試驗的預算編列與規劃」	4.13	(0.66)	23	4.01	(0.70)	25	2.63	(0.80)	21
41.臨床試驗開始前，CRN _s 應「參與個案報告單 (case report forms) 的內容設計」	4.24	(0.60)	15	4.14	(0.65)	16	2.58	(0.88)	27
42.臨床試驗開始前，CRN _s 應「協助計劃書的設計」	4.19	(0.60)	19	4.11	(0.66)	17	2.60	(0.87)	24
43.臨床試驗開始前，CRN _s 應「協助評估計劃書的可行性」	3.63	(0.60)	4	3.69	(0.52)	4	3.00	(0.54)	1
44.CRN _s 能「建立與聯繫試驗委託者和學術研究團隊間的關係」	3.79	(1.08)	34	3.94	(0.91)	29	2.74	(0.98)	13
45.CRN _s 可具有主持合作性臨床試驗的自主性	3.05	(1.08)	45	3.21	(0.88)	46	3.26	(0.91)	2
46.CRN _s 應「協助臨床試驗結果的發表」	3.75	(0.68)	37	3.83	(0.73)	38	3.19	(0.87)	4

註：CRNs = clinical research nurses (臨床研究護理師)。

Why Reliable Clinical Trial Data Matters?

In Drug Package Inserts



乙醯水楊酸(Acetyl Salicylic Acid, 以下簡稱ASA)是傳統用於解熱鎮痛的藥品, 近來隨著醫藥界的研究發現, ASA具有預防心臟病的功效, 經由研究更發現, ASA經低劑量投與後, 具有不可逆性阻斷Thromboxane A₂ (一種血管收縮素) 形成之作用, 而能減少血栓形成。但在高劑量下, ASA亦會抑制血管內皮中Prostacyclin (一種血管鬆弛素) 之生成。因此, 對於心肌梗塞之防治而言, 具有不利的影響。又市售一般乙醯水楊酸製劑之主成分含量常高達500mg, 因此, 心血管疾病患者, 常需將藥片製成數片, 而造成投藥之不便及劑量之誤差。有鑑於此, 本公司特別研製低劑量乙醯水楊酸—伯基腸溶微粒膠囊, 以供長期防治血管性疾病之用藥選擇。此外, 腸溶微粒劑型, 不但可降低藥物對胃腸之刺激性又可確保投藥後之有效性。因此, 伯基腸溶微粒膠囊適用於血管性疾病之防治。

【成分】每膠囊中含:

Aspirin.....100mg

【賦形劑】

Sugar Starch、Hydroxypropyl cellulose、Methacrylic Acid Copolymer、Triacetin、Capsule #4 (Gelatin、Sodium Lauryl Sulfate、Sunset Yellow FCF)。

【作用】

1. 本藥可經由促進環氧酶(Cyclo-oxygenase)之乙醯化而有效抑制循環內血小板Thromboxane之生成, 並進而緩解血管之痙攣及防止血小板之凝集。
2. 本藥之抗血小板凝集效應, 可延緩或降低血栓性栓塞疾病之發生及惡化。
3. 本藥亦可抑制Thromboxane於門脈循環中之生成, 且經由系統前代謝(肝代謝)後大多形成對血小板凝集不具影響性之代謝物Salicylate。因此, 進入全身循環內之Acetyl Salicylic Acid濃度極低, 故始不會抑制Prostacyclin之形成, 而干擾藥效的發揮。
4. 本藥內含以Acetyl Salicylic Acid為主成分之腸溶微粒, 可防止藥物於胃中崩散而造成胃腸不適, 並可藉由微粒之穩定釋放效果, 使患者獲得更安全、更有效的治療成果。

【適應症】

預防心肌梗塞、預防血栓性栓塞症、短暫性缺血性發作。

【用法、用量】

※本藥須由醫師處方使用。

口服投與。此類腸溶微粒膠囊, 最好於飯前並啜大量的水服用。

1. 降低可能會發生急性心肌梗塞病人的死亡率: 每天服用100-200毫克或每隔一天服用300毫克。為了達到快速吸收, 首次劑量應打開膠囊咀嚼服用。
2. 降低曾經發生心肌梗塞病人的再發生率及死亡率: 每天服用100-300毫克。
3. 預防再次中風: 每天服用100-300毫克。
4. 降低短暫缺血性發作的病人再次發生短暫缺血性發作及中風: 每天服用100-300毫克。
5. 降低穩定及不穩定型心絞痛病人的發生率及死亡率: 每天服用100-300毫克。
6. 預防在血管外科手術或侵入性治療所引起之血栓性栓塞症, 例如: 經皮冠狀血管成形術、冠狀動脈分流移植術、頸動脈內膜切除術、動靜脈導管: 每天服用100-300毫克。
7. 預防長期不動所產生的深部靜脈性血栓及肺栓塞, 例如: 在重大手術之後: 每天服用100-200毫克或每隔一天服用300毫克。
8. 降低有心血管危險因子病人發生第一次心肌梗塞的危險, 例如: 糖尿病、高血脂症、高血壓、肥胖、抽煙、老年人: 每天服用100毫克或每隔一天服用300毫克。

由於Ibuprofen可能會干擾本品的作用, 因此病人如果有在服用Ibuprofen治療疼痛並進行acetylsalicylic acid療程時, 必須要告訴主治醫師。

【禁忌症】依文獻刊載

1. 已知對Aspirin(Acetyl Salicylic Acid)、其他salicylates或本品其他成分過敏者(詳見「賦形劑」)。
2. 因salicylates或相似作用的物質, 如非類固醇的消炎藥, 所引起的氣喘病史。
3. 嚴重肝、腎疾患、血友病或其他出血性疾患、糜爛性胃炎或消化性潰瘍患者禁用之。
4. 懷孕第3期婦女: 不得使用。
5. 併用劑量為每星期15毫克或更高劑量的methotrexate。增加methotrexate的血液毒性(抗發炎藥普遍會降低methotrexate的腎清除而salicylates會取代methotrexate與血漿蛋白結合)。

【警語】依文獻刊載

1. 雷氏徵候群(Reye's Syndrome)之病因不明, 經常發生於兒童或二十歲以下青少年罹患過急性病毒性感染性疾患之恢復期中。其症狀包括嚴重嘔吐、嗜睡、昏迷等, 雖然其病例極為罕見, 但死亡率高達百分之二十至三十, 除者亦可能發生永久性之腦損傷, 經研究發現, 乙醯水楊酸之使用與此症之發生有明顯之相關性。
2. 不得併服含酒精飲料, 因可能造成胃出血。
3. 本藥不宜使用於12歲以下兒童, 亦不宜使用於18歲以下兒童及青少年之水痘或流行性感冒症狀之解除。因其可能與一種罕見而嚴重之疾病—雷氏症候群(Reye's Syndrome)有相關性。
4. 蠶豆症(6-磷酸葡萄糖脫氫酶缺乏症, Glucose-6-Phosphate Dehydrogenase Deficiency)患者, 不宜服用本藥。

【注意事項】依文獻刊載

1. 本藥與抗凝血劑併用時宜謹慎監測血液之凝集情形。

1. 適應症
2. 用法/用量
3. 禁忌症
4. 孕婦/授乳注意
5. 藥物交互作用
6. 副作用
7. 保存注意

....

【孕婦、授乳婦之投與】依文獻刊載

孕婦

1. 有些流行病學的研究結果顯示, 在懷孕的前期三個月使用含salicylates的藥物, 與產下畸形兒(裂頭畸形、心臟畸形)的危險率提高有關。然而, 在正常的治療劑量下這樣的危險率似乎很低。在一個以32000對母子為對象的前瞻性研究中, 使用此藥物與畸胎率的提高之間並沒有關聯。
2. Salicylates只有在嚴密的評估過用藥危險及效益後, 才能在懷孕期間使用。
3. 在懷孕的末三個月使用高劑量的salicylates (每天大於300毫克)會造成懷孕期延長、動脈導管過早關閉、以及抑制子宮收縮的現象。發現母體及胎兒出血的危險性有增加的現象。
4. 在生產前投與高劑量的salicylates (每天大於300毫克)會造成顱內出血, 特別易發生在早產兒。

哺乳

Salicylates及其代謝物會有少量排泄到乳汁中。由於在偶而使用下並未發現對嬰兒會產生不良作用, 通常不需要因此而中斷授乳。然而, 長期使用高劑量salicylates的母親應盡早停止授乳。

【新生兒、乳兒之投與】依文獻刊載

由於新生兒及乳兒之組織器官尚未發育完全, 宜先權衡治療之必要性方始投與。

【藥物交互作用】依文獻刊載

使用劑量為每星期15毫克或更高劑量的methotrexate:

增加methotrexate的血液毒性(抗發炎藥普遍會降低methotrexate的腎清除而salicylates會取代methotrexate與血漿蛋白結合)。

增加methotrexate的血液毒性(抗發炎藥普遍會降低methotrexate的腎清除而salicylates會取代methotrexate與血漿蛋白結合)。

增加methotrexate的血液毒性(抗發炎藥普遍會降低methotrexate的腎清除而salicylates會取代methotrexate與血漿蛋白結合)。

抗凝血劑, 例如coumarin、heparin:

因抑制血小板功能而增加出血的危險, 破壞腸胃黏膜且取代口服抗凝血劑與血漿蛋白結合之處。

促尿酸排泄劑, 例如benzbromarone、probenecid:

降低尿酸排泄的效果(與腎小管尿酸清除的競爭作用)。

Digoxin:

因腎排除的減少造成digoxin的血漿濃度增加。

糖尿病用藥, 例如insulin、sulfonylureas:

高劑量的Aspirin(acetylsalicylic acid)藉由其降血糖作用及取代sulfonylurea與血漿蛋白結合而加強了血糖降低的效果。

Thrombolytics/其他抗血小板劑, 例如ticlopidine:

增加出血的危險性。

全身性的類皮質類固醇(glucocorticoid), 除了用於取代治療Addison's Disease的氫皮質酮(hydrocortisone):

因為皮質類固醇(corticosteroid)會增加salicylate的清除, 所以在corticosteroid治療期間血中salicylate量會降低, 但停止治療後則有salicylate過量的危險性。

Valproic acid:

因取代蛋白質結合處而增加Valproic acid的毒性。

酒精:

因Aspirin(acetylsalicylic acid)與酒精加成作用, 增加胃腸黏膜的破壞且延長出血時間。

【使用後之注意】依文獻刊載

本藥服用後, 若發生過敏或不適現象(如發疹、搔癢等), 請立即停藥並請教醫師或藥師。

【副作用】依文獻刊載

一般而言, 依指示每日服用1粒所產生之副作用極為輕微, 偶有胃腸不適、惡心、嘔吐、胃黏膜受損、潰瘍及隱性血液流失現象, 如眩暈、耳鳴、暫時性耳聾及代謝性酸中毒則與高劑量之投與有關。

【過量使用】依文獻刊載

對老人及孩童必須擔心可能因毒性(治療上的過量或意外中毒)而致死。

徵候學:

中度中毒:

惡心、嘔吐、耳鳴、聽覺損傷、頭痛、眩暈及精神混亂的現象而降低劑量即可控制。

嚴重中毒:

發燒、肺換氣過度、酮病、呼吸性鹼血症、代謝性酸毒症、昏迷、心臟血管性休克、呼吸衰竭、嚴重低血糖。

緊急處理:

1. 立即送往醫療院所。
2. 洗胃、給予活性炭、檢查酸鹼平衡。
3. 使用鹼性利尿作用以便使尿液的pH值介於7.5到8之間, 當成人血漿中的salicylate濃度高於500毫克/公升(3.6mmol/liter)或孩童的salicylate血漿濃度高於300毫克/公升(2.2mmol/liter)時應考慮強迫鹼性利尿作用。
4. 嚴重中毒時可使用血液透析的可能性。
5. 流失的體液需補充。
6. 根據症狀治療。

【保存上之注意】

1. 本藥應置於小兒伸手不及處。
2. 於25℃以下儲存。
3. 請在有效期限內使用。

【包裝】

2~1000粒塑膠瓶裝、PTP鋁箔盒裝。

From Clinical Trials to Real-World Data

- Key Difference:

Feature	Clinical Trials	Real-World Data
Environment	Controlled, specific settings	routine clinical practice, diverse settings
Data Collection	Structured, protocol-driven	Unstructured, from various sources
Sample Size	Typically smaller	larger, reflecting broader populations
Generalizability	Limited to the trial population	Enhanced generalizability to real-world populations and settings
Purpose	for evaluating safety and efficacy	for understanding real-world performance and long-term effects.

From Clinical Trials to Real-World Data

- *About Thalidomide*

- 沙利竇邁(Thalidomide)是由西德公司葛盧恩塔化學製藥(Chemie Grünenthal)研發生產的，於1957年在德國上市，並銷往歐洲、加拿大、日本等世界各地。沙利竇邁有安眠、鎮定等作用，也可減少噁心感，當時用來舒緩孕吐症狀。
- Thalidomide 後來發現會導致胎兒嚴重畸形，尤其是肢體畸形(海豹肢)，並影響眼睛、心臟、消化道和尿道。1961年揭露此危害時，全球已約有1萬名嬰兒受害。促使全球許多國家修訂新藥上市的試驗流程與安全標準，對藥物管制規則影響深遠。



Data Collection and Ethical Concerns:

An Overview of Historical Events

- 醫療人員照顧病患時的各種行為，是法律上所特許的工作。由於是為了病患醫療上的需要，即使執行時侵犯到病人的身體或隱私，並不會被認定為是侵犯病人的權益。
- 但是當在病患身上所做的，並不是為了病人醫療上的需要，而是為了研究工作時，病人的權益是否有被侵犯，就是值得討論的問題。

Tuskegee Study(1932-1972, USA)



- **概述**：1932年由美國公共衛生局主導的研究，針對**非裔美國人男性梅毒病患**進行**未治療之自然病程觀察**，並進行**腰椎穿刺等檢查**，卻未進行**知情同意**(被告知是**淋血**需要治療)，甚至在盤尼西林出現後也未給予治療。
- **隱私相關問題**：除知情同意與人權剝奪，與研究資料與身份資訊也被用來長期追蹤病患，卻**未告知與未保密**。
- **結果**：1972年7月，事件登上紐約時報，公衛局宣布終止實驗。
129 名死於梅毒或梅毒併發症；40 名受試者的妻子感染；有 19 名受試者子女出生即患有梅毒。

Between Duty and Ethics

Nurse Eunice Rivers in the Tuskegee Study...

- Eunice Rivers是一名非裔美國女性護士。主要職責包括招募參與者、安排醫療檢查、提供醫療照護，以及在受試者死亡後協助獲得屍檢許可。
- 她給這些受試者服用了無效藥物「spring tonic」*和阿斯匹靈，並在他們檢查當天提供交通和熱餐。
- 為何Rivers在當時並未指出這些不正當的安排？
 1. 種族歧視與權威的醫療體制
 2. 資訊不對稱
 3. 扮演盡職責的研究人員、照護者角色



* A spring tonic is a traditional remedy used in herbalism to revitalize the body after winter, typically made from wild greens and herbs.

The Henrietta Lacks Case(HeLa Cells, 1951)

- **概述**：1951年，一位名為Henrietta Lacks的非裔婦女在約翰霍普金斯醫院接受子宮頸癌治療時，在不知情的狀況下，被「順便」切了一塊腫瘤組織，並發現了海拉細胞(HeLa)，是科學史上著名且最有價值的人類細胞。海拉細胞發展出疫苗、複製技術、試管嬰兒與許多藥物，創造龐大產業價值，但過程未經同意地取用並大量複製。2013年海拉細胞的全基因序列被公佈。
- **隱私相關問題**：暴露後代特徵、疾病傾向，並可能會使個人遭到保險公司拒絕、涉及不當牟利。
- **結果**：2013年8月，NIH宣布和Henrietta Lacks的後代達成協議。未來若要使用海拉細胞做研究，必須向NIH申請，並遵守相關規範，並將研究成果貢獻到資料庫。



Why data management is absolutely essential in clinical trial?



- Ensures **trustworthy results**.
- To Identify **safety signals early**, enabling timely intervention or trial modification to protect participants.
- Clinical trials generate large volumes of data from **various sources** (e.g., labs, eCRFs, imaging, devices).
- Ensures Regulatory Compliance(e.g. FDA, EMA).
- Advanced methods enable better insights.

Guidelines and Regulations

- **21 CFR Part 11**(scope and application of part 11 of Title 21 of the Code of Federal Regulations. [Electronic Records/Electronic Signatures](#))
 - Apply to records in **electronic form** that are created, modified, maintained, archived, retrieved, or transmitted under any records requirements set forth in FDA regulations
 - Scope includes:
 - 1) validation
 - 2) audit trail
 - 3) legacy systems(舊系統整合)
 - 4) copies of records
 - 5) record retention

Guidelines and Regulations

- Key article of **ICH GCP(good clinical practice) E6 R2**

Article Number	Summary
2.10 & 5.5	data handling and record keeping , data confidentiality
5.18	Monitor's Responsibilities: To protect the rights and well-being of human subjects and ensures trial data are accurate, complete, and verifiable from source documents
4.11	Safety reporting (AE,SAE)
4.9.1	• The investigator should ensure the accuracy, completeness, legibility, and timeliness of the data reported to the sponsor in the CRFs and in all required reports.

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Limitations under ICH E6(R2)

- **Diverse Data Sources and Regulatory Gaps**

- 1) diverse data sources in clinical trials (e.g., wearable devices, ePRO, , remote monitoring), **technology adoption has accelerated—especially after COVID-19.**
- 2) The regulations still lean toward traditional systems (e.g., paper-based records or classic EDC), creating a gap between current practices and regulatory guidance, **particularly for validation and compliance of emerging data sources.**

- **R2 introduces the **risk-based approach**, its application is mostly limited to:**

- 1) Clinical trial monitoring(e.g., 100% on-site monitoring)
- 2) A **significant portion of trial costs** is spent on Monitoring Visits (MV)
 - cost 9-14% of site monitoring (A Sertkaya et al., 2016)
 - cost 17.1% of Site monitoring for phase II trial, 16.2% for phase III trial(Martinez, 2016)

- **Non-risk-adjusted standards, leading to:**

- 1) Excessive low-value queries (query fatigue)
- 2) Wasted human resources on non-critical data fields
- 3) **Inability to focus on high-risk or high-impact data points that matter most to trial outcomes**

- On January 6, 2025, [the ICH released the E6\(R3\) revision of the GCP guidelines](#), addressing technological advancements and the growing complexity of clinical research.

Article Number	Summary	Difference between ICH E6 R2(2016.9) and ICH E6 R3(2025.1)
3.16	requires sponsors to secure data across all phases—from collection, storage, and access, to disposal(Data governance).	E6 R2 limited focus on data security and lifecycle management, causing inconsistencies in data handling practices.
Principle 6/ 3.10	Quality by design(QbD) involved	QbD aims to identify critical data and processes for maintaining trial quality , identify risks that could undermine these elements, ensure the reliability of trial outcomes.
Principle section	• Emphasizes diverse trial designs and the use of technology (e.g., EHRs, wearables, ePRO). • Processes for managing computerized systems, ensure they are <u>fit for purpose</u> and used appropriately. • Highlights participant rights protection under various conditions (e.g., e-consent, transparency, results sharing).	• <i>E6 R2</i> limited provisions for innovative trial designs and modern technologies. • E6 R2 lacks support for addressing ethical issues from new technological approaches in trial design and implementation.
NA	• Clinical trial processes should be implemented in a way that is proportionate to the risks to participants and to the importance of the data collected, avoids unnecessary burden on participants and investigators.	• A key limitation of ICH E6(R2) is lack of extend the risk-based approach to data validation and cleaning processes. • Most data are handled uniformly, without considering risk level or outcome impact, leading to inefficient resource use and reduced focus on critical data for trial reliability.

Data management- Data Entry/Data Capture



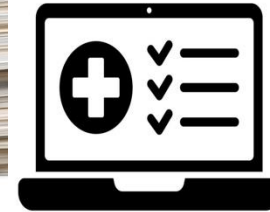
- **Definition:**

- 1) **Data entry** is the manual process of typing or transferring patient information, such as text and numbers from source documents (e.g., EMR) into the data management system(e.g. EDC).
- 2) **Data Capture** can include data entry but mainly uses technology to automatically collect and convert information from documents(or device).

What is Case Report Form(CRF)?

- A case report form (CRF) is a **standardized document** used in clinical trials/research to **collect data** from study participants.
- It's designed to capture all the information required by the study protocol, ensuring a consistent and **organized way** to collect and manage data.

Source Documents(data)

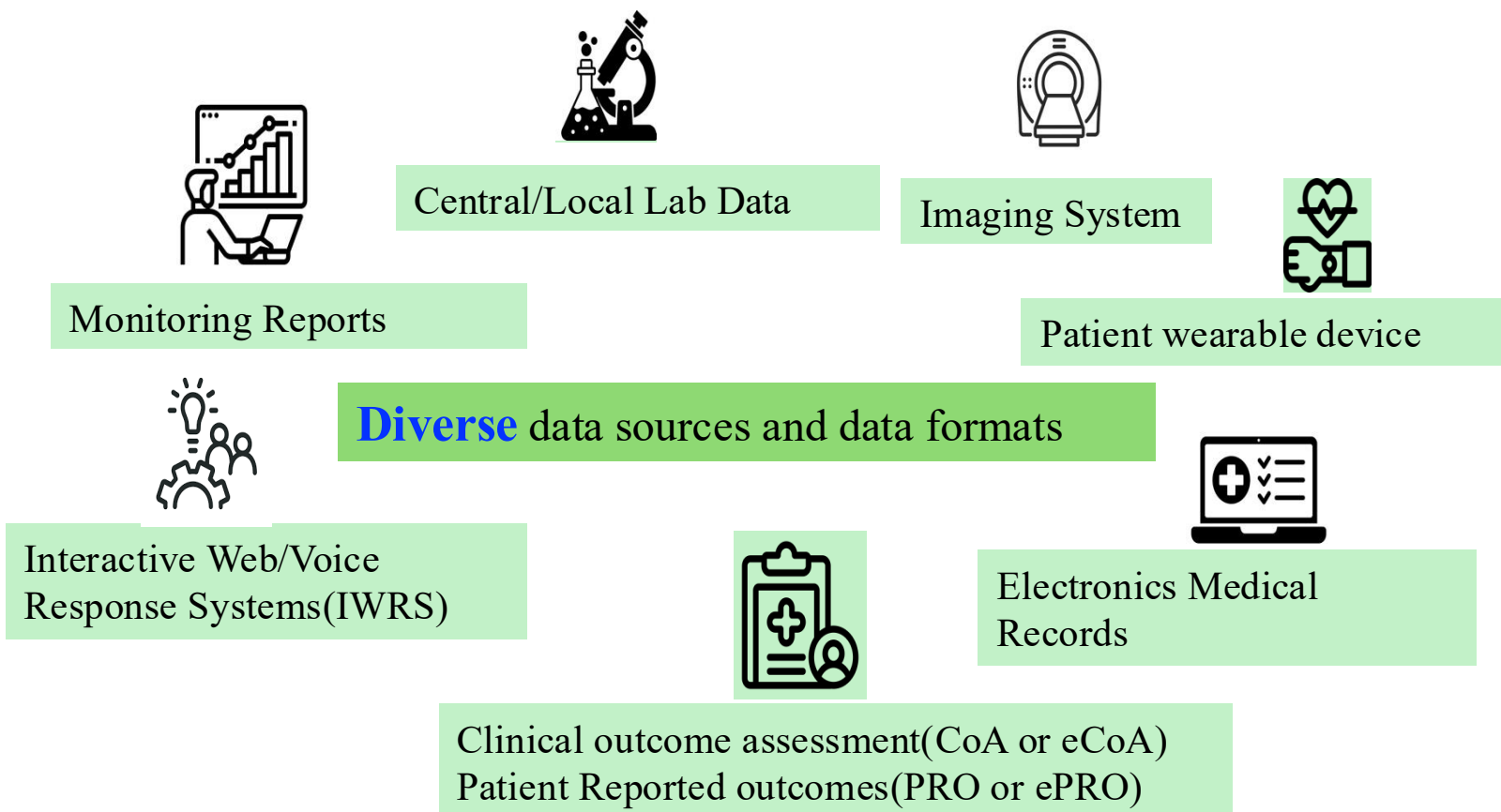


Paper CRF

PROTOCOL NO. MA-CT-10-002	SITE ID 0011	SUBJECT INITIALS N-V	SUBJECT ID 0011
SCREENING (V1 / -14 to -1 days)			
MEDICAL AND SURGICAL HISTORY			
Does the subject have any past or ongoing medical / surgical history?		☒ 1 Yes ☐ 2 No If 'Yes', please provide details below:	
Description	Start Date (dd / mm / yyyy)	Stop Date (dd / mm / yyyy)	Ongoing Any Past/Ongoing medications recorded?
Type II Diabetes Mellitus	UK/UK/1990	___/___/___	☒ ☐
Hypertension	UK/UK/1995	___/___/___	☒ ☐
Underwent Surgery for Kidney Stones	UK/UK/2007	UK/UK/2007	☐ ☐
___/___/___	___/___/___	___/___/___	☐ ☐
___/___/___	___/___/___	___/___/___	☐ ☐
___/___/___	___/___/___	___/___/___	☐ ☐
*If past / ongoing medication is recorded, then please provide details in Prior Concomitant Medication page.			
☐ Check this box if supplementary page is used.			
Version 1.0		02-Jun-2010 Page 4	

electronic CRF

Data management- Data Entry/Data Capture



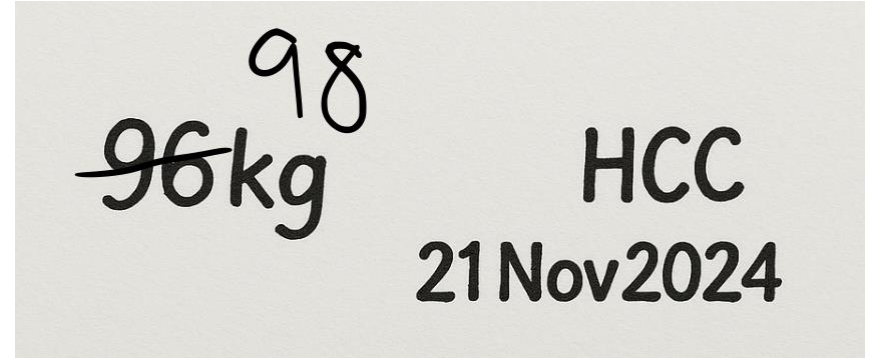
• Site-Level Practical Approaches:

1. Ensure records are complete and accurate.
2. Data traceability
3. Data standardization(per CRF design)
4. Real-time entry(safety data)
5. Utilize automated data capture
6. Cross-functional Collaboration

Data management- Data Entry/Data Capture

- 紙本原始文件的書寫與修改原則：

1. 使用不可擦拭墨水：
藍色或黑色原子筆，避免鉛筆/橡皮擦/修正液
(遮蔽)
2. 即時紀錄
在事件發生當下或儘快後立即填寫，避免延
遲補寫
3. 清楚、可辨識&閱讀(**Legible and Traceable**)
不可塗改(包含整個塗黑)、潦草或使用模糊的
縮寫
4. 紀錄者須簽名或縮寫及日期(**Sign and Date**)
所有資料須能追溯至填寫者
5. 蓋章通常會有「無法確認是本人」之疑慮



98
~~96~~kg HCC
21 Nov 2024

ALCOA+

for Data Integrity

- ALCOA+ 是指數據達到完整(Integrity)應具備的原則，基於以下五項原則的字首：
 - **Attributable**：能識別執行作業的個別人員。應有紀錄佐證該作業是由誰執行，以證其為通過訓練及資格檢定的人員，亦適用於對紀錄的變更(更正、修改、刪除等)。
 - **Legible**：所有紀錄必須清晰易讀，原始數據及其他後續的修改不應模糊不清或被掩蓋。
 - **Contemporaneous**：執行或完成作業(包含行動、事件或決策)的當下，相關數據即被記錄。
 - **Original**：數據應能維持或回復至最初被記錄的狀態，即原始數據或其真實副本，無論數據是以紙本或是電子形式被記錄。
 - **Accurate**：保證數據、紀錄或其結果之準確性。

Data management- Data Entry/Data Capture

- 受試者隱私資料保護原則：

1. 採用編碼(受試者編號)：取代姓名、病歷號等直接識別資料。資料處理過程確保無法直接連結到特定個人
2. 最小原則：只搜集直接相關的最少必要資料
3. 知情同意：受試者必須在充分了解資料使用目的、範圍、保存期限以及個人數據將如何受到保護
4. 嚴格的存取權限管理：僅被授權的研究人員才能接觸受試者資料
5. 遵守相關法律規範：除GCP外，如個人資料保護法、人體研究法
6. 資料保存與銷毀：依照保存期限到期後銷毀，銷毀過程有完整記錄
7. 限制使用：當研究目的超過原本同意的研究目的，需經過受試者再次同意(IRB同意)

Data management- Data Validation

- **Definition:**

The process of checking the accuracy, consistency, and compliance of entered data to ensure it meets predefined rules and standards.

- **Types of Data Validation**

1. System Validation(automated)
Range checks, Mandatory fields, formats, logic
2. Manual Validation
Add medical and protocol-specific context.
source data verification(SDV), logic, protocol deviation(PD)

Data management- Data Validation

- **Site-level Practical Approaches:**

1. Collaborate with CRA, PI, and DM.
2. Check for **logic** errors(**discrepancy**).
3. Ensure audit trails for transparency
4. Promptly respond to queries.

- **Examples of Discrepancy**

1. Date Conflict(e.g. 同意書簽名日晚於第一個研究程序執行)
2. Demographic mismatch(e.g. 生育年齡女性但檢測FSH)
3. Unreasonable data(e.g. 兩個visit的體重突然從50kg變成80kg)
4. Not meet Criteria(e.g. HBV為EC但被納入試驗)
-->納入錯誤受試者(PD)
5. Clinical inconsistent(e.g. 下肢MRC 2分, 但問卷紀錄為不需使用輔具行走)



Data management- Data Clean

- **Definition**

Further checking and **correcting** errors to ensure data consistency and accuracy.

- **Data Cleaning Activities Before Data Cut-off(DCO)**

1. The DCO process is crucial in interim analysis, to assess the data at a specific point in time, **rather than waiting** for the complete study to finish.
2. triggered by 1) predefined number of events or 2) follow-up milestones.

It supports(Shi et al., 2021):

- **Sample size re-calculation** in adaptive designs
- Preparation of **regulatory TLFs***(DSUR, IND, BTM etc.)



Related activities before DCO

1. Query resolution
2. Missing data trace-back
3. Subject status and AE/SAE/SUSAR Reconciliation

Data management- Database Audit

- **Definition:**

Database audit is a systematic review of a database's integrity, security, and compliance processes, conducted after data entry and validation but before database lock.

It focuses on audit trail completeness, data change tracking, and access control to **ensure regulatory standards**.

	Database Audit	Data Validation
Target	Entire database 、 Data management processes	Individual or specific range of data entries
Purpose	Ensure overall data quality and compliance	Verify accuracy and consistency of data
Timing	Typically before database lock	Ongoing after data entry

• **Data Validation** ”數據是否正確?”

Ex. 體重從 50kg → 80kg → 數據輸入錯誤

• **Database Audit** “處理數據的過程是否可信?”

Ex. 誰修改了體重數據? 為什麼修改? 誰修改? 有沒有適當的過程紀錄?

Data management- Database Locking

- **Definition:**

After a proper quality check and assurance, freeze the database to prepare for analysis.

- **Key Process Points:**

1. **Final Validation**

2. **Pre-lock Checklist:**

Ensures all data management tasks are complete before locking.

PI acknowledges data is ready for database lock & sign-off CRF.

3. **Data Extraction:**

Performed from the final locked database for statistical analysis.

→no modification in the database is possible.

4. **Exception Handling:**

If a critical issue arises, users may unlock and update the database.

→require proper justification, documentation, and audit trail.

Data management- Data Analysis

- **Definition:**

Perform statistical analysis on locked data to derive study conclusions.

- **Key Process Points:**

1. Follow the Statistical Analysis Plan(SAP): pre-defined methods to ensure scientific validity and objectivity.
2. Analyze the primary endpoint(statistical significance/clinical relevance). Evaluate secondary endpoints, safety outcomes.
3. **Site Operations:** site may be asked to provide clarifications or additional data

PI: participate in the **SAP development** 、 data interpretation(provide medical explanation)

Data management- Data Storage

- **Definition:**

Securely store all clinical data in compliance with regulatory requirements for future reference.

- **Site-level Practical Approaches:**

1. Preserve essential records: 文件清楚標示(受試者編號、文件版本日期等), 存放於專屬資料櫃
2. Ensure traceability & confidentiality: 可上鎖資料櫃, 僅授權人員可存取
3. Digital File Protection: 定期備份, 電子系統需有Audit Trail與加密機制
4. Retain per regulatory timelines: 依照規定年限保存資料
5. Off-site storage(外部倉儲): 有完整移交紀錄(箱號, 內容, 索引清單, 日期, 負責人), 合約需載明(保存期限, 查閱取回機制, 銷毀流程等)
6. Be Audit(inspection)-Ready



Data management- Data Storage

臨床試驗資料保存

計畫主持人、試驗委託者、人體試驗委員會、試驗機構均應妥善保存臨床試驗相關文件，以供主管機關查核。

	資料保存	相關條文
人體試驗委員會	應保存書面作業程序、委員名單、委員職業及聯繫名單、送審文件、會議紀錄、信件、及其他臨床試驗相關資料至試驗結束後至少三年，且可供主管機關隨時調閱。	藥品優良臨床試驗作業準則第29條，人體試驗管理辦法第10條，醫療器材優良臨床試驗管理辦法第47條
計畫主持人	應妥善保管所有臨床試驗相關重要文件，並防止遭受意外之破壞或提早銷毀。應保存至試驗藥品於我國獲准上市後至少二年。但其他法規規定之保存期間長於二年者，從其規定。依醫療器材管理法其保存期間則至試驗完成後至少三年。但其他法規規定之保存期間逾三年者，從其規定。	藥品優良臨床試驗作業準則第60、101條，醫療器材優良臨床試驗管理辦法第30條
試驗委託者	應保存所有試驗委託者應負責與試驗相關之必要文件，至試驗藥品於我國核准上市後至少二年。但其他法規規定之保存期間長於二年者，從其規定。 依醫療器材管理法其保存期間，至試驗完成後或該醫療器材依本法規定登錄或取得許可證後至少三年。	藥品優良臨床試驗作業準則第58、59、60、61條，醫療器材優良臨床試驗管理辦法第15、22條
醫療機構	醫療機構之病歷，應指定適當場所及人員保管，並至少保存七年。但未成年者之病歷，至少應保存至其成年後七年；人體試驗之病歷，應永久保存。	醫療法第2、8、70條

Not just a Clinical Trial ...

Clinical Evidence helps Healthcare keep moving forward.



Each piece of **data** is like a brick or a steel bar. If it's placed wrong, **the whole structure might become unstable.**

A strong house stands because many **people work carefully and pay attention to details.**

Protects participants' rights throughout the study.

Thank you

