療,種々の病態時の治療法,引用文献,降圧薬一覧などからなっている.文献のエビデンスの強さの評価は Agency for Health Care Policy and Research (AHCPR) の基準に基づいて、引用文献 325 報ごとに示されている。本文中には治療の標準的アルゴリズムが記載されている。薬剤名は具体的なものより、Ca 拮抗薬、ACE 阻害薬といった分類名で記載することが多い傾向にある。独立した項目として医療経済学についてはあげられていない。

本文,表中にあげられている薬剤数は87種,薬効分類による薬剤群は8群であった. EDL と共通している薬剤は、ニフェジピン、カプトプリル、ヒドロクロロチアジド、スピロノラクトン、アテノロール、プロプラノロール、プラゾシン、メチルドパ、レセルピン、ヒドララジンの10種であった.

薬剤群としては Ca 拮抗薬,ACE 阻害薬,利尿薬, $\beta$  遮断薬, $\alpha$  遮断薬,交感神経抑制薬,古典的血管拡張薬が共通であり,EDL に収載されていないものはアンジオテンシン II (AII) 受容体拮抗薬のみであった.このようにして,ガイドラインごとに調査を行った.

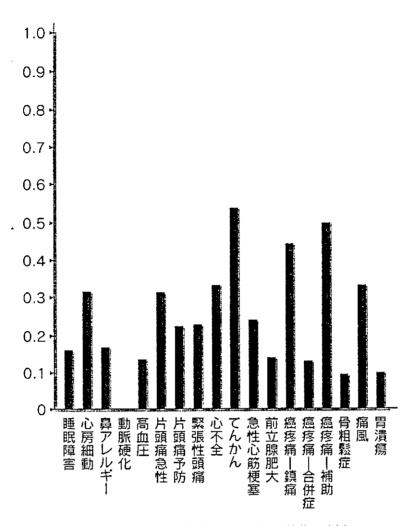
検討した15のガイドライン中,治療,報告などのエビデンスの強さと,そのエビデンスレベルの判断基準を示したものは9つであった。また,フローチャートなどで標準治療の手順を示したものは8つであった。医療経済学的な項目の記載があったのは3つのみであった。

ガイドラインに掲載されている薬剤名の数は $0\sim113$ で大きなバラツキがあり、多くは数十の薬剤があげられていた。例外的なものとして、前立腺肥大症の診療ガイドラインがあげられた。本文中では具体的な薬剤名はなく、薬効分類のみが示されており、CD-ROM に収められた患者向け説明文書に具体的な薬剤名が示されていた。

記載薬剤数が最も多かったものは市中肺炎ガイドラインで 113, 次いで高血圧 症ガイドラインが 87 であった. 最も少ないものは癌治療ガイドライン中の鎮痛薬 で 9 であった.

これらガイドライン中に記載された薬物で EDL 中にも共通して記載されている薬物数はかなり少なく、最大の市中肺炎ガイドライン中の微生物に対する薬物でも 17、高血圧症治療薬でも 10 であった。高脂血症治療薬については、EDL の性質上の観点から薬剤名自体が記載されていないため、共通薬剤はなかった。

ガイドラインごとの共通薬剤の頻度は骨粗鬆症の4%から癌疼痛鎮痛薬の56% までであり、50%を超えていたものは2種のガイドラインのみであった(②).

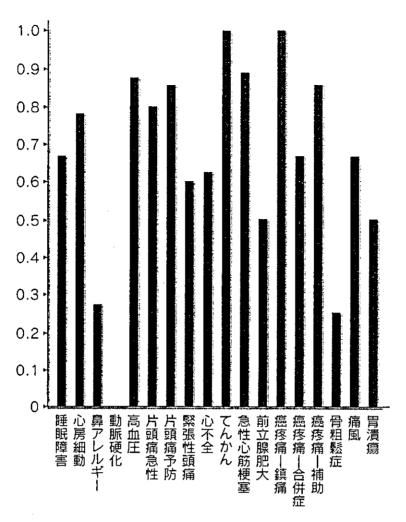


❷ EDL 薬剤と共通するガイドライン中の薬物の割合

これらのことから、わが国の診療ガイドラインに記載されている薬物は EDL に 比べ格段に多いことが明らかである.多くのガイドラインは保険適応のあるすべ ての薬剤もしくは主な薬剤を記載しており、ガイドライン自体で治療薬を選択し ているものは少ないように思われた.しかし、日本神経学会から出されている慢 性頭痛、てんかん治療ガイドラインは治療薬の推奨度が記載されており、ある程 度の選択がなされた薬物リストの一種と考えられる.そのほかのガイドラインで もフローチャートを用いて治療の標準化を指向しているものがみられた.これら のガイドラインでは治療薬を具体的に示さず薬効群で記載しているものが多かっ た.

ガイドライン自体に記載されている薬効分類に基づく薬効群の数は  $2 \sim 15$  群であった。薬効分類に基づいて,EDL に収載される薬剤で代替を行った場合には半分以上の薬効群を代替できるのもが 19 例中 15 例あった(3)。

このように共通する薬剤群で検討すると動脈硬化性疾患のガイドラインを除き,



❸ EDL 薬剤と共通するガイドライン中の薬効分類

図のように、多くのガイドラインにおいて薬剤群のかなりの部分が共通していた. ここで代替可能な薬剤が EDL に収載されていない薬物をみると、一定の傾向が見出された. 高血圧、心不全における AII 受容体拮抗薬、片頭痛急性発作時のトリプタンなどがまず一つのグループであり、比較的新しく治療上のエビデンスが少ない、またコストの高いものが含まれている. もう一つのグループは心房細動の抗不整脈薬で Vaughan Williams の Ic 群、III群、心不全のホスホジエステラーゼ阻害薬、アミオダロン、胃潰瘍の防御因子増強薬、緊張性頭痛の経口筋弛緩薬などであり、これらは有効性について議論のあるものからなると考えられる.

# EDL をもとに formulary などを作成する

以上のことから、EDL は確かに掲載されている薬品数は少ないものの、それぞれの薬効群で他薬剤に代替を行えば、わが国の診療ガイドラインに沿った治療も

行える可能性がある. たとえば医療施設レベルのドラッグリスト, すなわち formulary を作成する場合には EDL を基礎として考えることは十分可能であるし, 理にかなっているものと思われる. その場合, ほかの薬効群を追加したり, 同種薬を少数追加・置き換えを行う必要がある. この選択こそが重要であり, リストの目的によって, 参考とするデータが医療経済的なものか, 臨床的なエビデンスであるかが決定される. わが国では保険診療の下で, 薬品の価格については使用する医師の側で考慮されることが少なかった. これを反映してか, 今回検討したガイドラインに医療経済学的がされているものは少なかったが, 今後はコスト・ベネフィットの視点も考慮に加えたドラッグリストの作成も望まれる.

付記 本稿は一部,平成14-15年度厚生労働科学研究「EBMに基づいた必須医薬品リスト選定のガイドライン作成に関する調査研究」(主任研究者:渡邊裕司)によりなされた.

-Regular Articles-

# Items of Concern Associated with Source Document Verification of Clinical Trials for New Drugs

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In the present study, we analyzed concerns of the sponsors of clinical trials regarding source document verification (SDV) procedures performed at the University of Tokyo Hospital during April 1999 and March 2001, with special focus on the differences in description between the source document and case report form (CRF). Of 132 SDV procedures (78 protocols, 496 cases), the sponsors had problematic concerns with 348 cases (70.2%) totalling 693 items, which consisted of description inconsistencies between the source documents and the CRF (41.4%), lack of description in the CRF (39.8%), and lack of description in the source documents (8.8%). The most frequently found inconsistencies between the source documents and CRF were concerning items regarding observations, laboratory examinations, and compliance, which were associated with misdescription of clinical data and/or items for evaluation in the CRF. It was also revealed that the frequent lack of description in the CRF was associated with patient history and/or complications, adverse events, and concomitant drugs and/or therapy. In contrast, the frequent lack of description in the source documents was associated with items concerning patient background, observations, and informed consent. Further, we found that submission of a report of deviation from the protocols was required for 4.0% of the claims. These results suggest the necessity of better data management during the practice of clinical trials for the purpose of maintaining the quality of clinical trials.

Key words—clinical trials; source document verification; SDV; case report form; CRF

#### INTRODUCTION

Clinical trial of new drug is the final and most important step through new drug development process. It provides clinician and pharmacist with the basic information on the use of drug in patient with disease, such as target indication and disease symptom, dosage regimen and cautions for use, at the time of general clinical and dispensing practice. Therefore, clinical trial of new drug needs to be conducted under a qualified manner with well designed clinical study protocol. Clinical trial also has to be conducted under an ethically acceptable condition.

For ensuring the above, the new GCP introduced by the amendment of Japanese Pharmaceutical Affairs Law in 1997 requests a sponsor for clinical trial to monitor trial to ascertain that they are performed (or conducted) in an accurate and verifiable manner. For this purpose, source document verifica-

tion (SDV) is performed, by which the sponsor inspect both the case report form (CRF), submitted by the doctors, and source documents, including medical records. At the University of Tokyo Hospital, we established a system in April 1999 to consolidate the management of such inspections, which are associated with SDV procedures, with the Clinical Research Center.<sup>1)</sup>

For the present study, we analyzed concerns pointed out by sponsors during the early stages of operation of this system, particularly focusing on the differences in content between the CRF and source documents. We also discuss problems experienced with the management of data obtained in clinical trials at our hospital.

# **METHODS**

We focused on SDV procedures performed from April 1999 to March 2001, and analyzed the difference in content between the source documents and CRF by checking the monitoring/inspection report submitted by the sponsors to our hospital following each SDV.

The concerns pointed out by the sponsors were divided into 4 categories; lack of description in either the source documents or CRF, inconsistency between the source documents and CRF, and miscellaneous. In addition, the same concerns were also divided into 9 categories, which were use of concomitant drugs and/or therapy, patient history and/or complications, laboratory examinations, patient background, adverse events, matters regarding observation, compliance, informed consent, and miscellaneous. Both sets of classifications were subjected to analysis. We also analyzed how the doctors responded to the claims of differences between the source documents and CRF raised by the sponsors, and, based on the frequency of each kind of claim, discuss methods to solve these problems that can be implemented in the future.

#### RESULTS

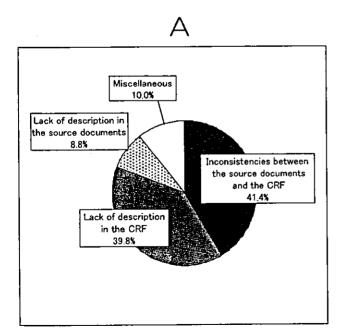
#### Analysis of concerns pointed out by the sponsors:

We analyzed sponsor reports regarding 496 cases, which originated from 132 SDV procedures based on 78 protocols. Among them, concerns were pointed out by the sponsors for 348 cases (70.2%), which totalled 693 individual problematic matters. These consisted of inconsistencies between the source docu-

ments and CRF (287 items, 41.4%), lack of description in the CRF (276 items, 39.8%), lack of description in the source documents (61 items, 8.8%), and miscellaneous matters including failure to obtain patient data (69 items, 10.0%).

These concerns were also classified into 9 categories, which consisted of use of concomitant drugs and /or therapy (145 items, 20.9%), patient history and/ or complications (118 items, 17.0%), laboratory examinations (110 items, 15.9%), patient background (91 items, 13.1%), adverse events (68 items, 9.8%), matters regarding observation (67 items, 9.7%), compliance (39 items, 5.6%), informed consent (39 matters, 5.6%), and miscellaneous (16 matters, 2.3%) (Fig. 1). Each of these was analyzed based on the lack of description in either the source documents or CRF, inconsistency between the source documents and CRF, and miscellaneous, and the results are summarized in Table 1.

The most frequently found inconsistencies between the source documents and the CRF were concerning matters regarding observation (43 items, 64.2%), laboratory examinations (63 items, 57.3%), and compliance (22 items, 56.4%), which were associated with misdescription of clinical data and/or items for evaluation in the CRF. It was also revealed that the frequent lack of description in the CRF was associat-



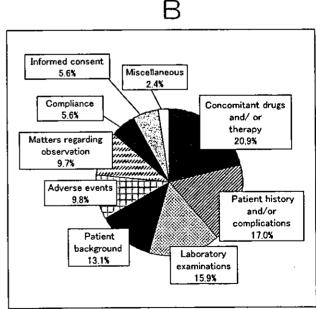


Fig. 1. Problematic Items Pointed out by Sponsors of Clinical Trials

Six hundred ninety-three separate items pointed out by the sponsors of clinical trials regarding our SDV procedures were analyzed. The concerns were analyzed from the viewpoint of consistency of the descriptions between the source documents and CRF (A), and also from the viewpoint of incorrect information entered into the source documents and/or CRF (B).

Table 1.	Classification of Concerns Pointed out by Sponsors Regarding SDV Procedures.
	Number of items of concern (%

	Inconsistency between the source documents and the CRF	Lack of description in the CRF	Lack of description in the source documents	Miscellaneous	Total
Patient background	38 (41.8)	33 (36.3)	18 (19.8)	2( 2.2)	91 (100)
Patient history and/or complications	25 (21.2)	78 (66.1)	11 ( 9.3)	4(3.4)	118 (100)
Concomitant drugs and/or therapy	68 (46.9)	67 (46.2)	4(2.8)	6(4.1)	145 (100)
Matters regarding observation	43 (64.2)	13 (19.4)	11 (16.4)	0(0.0)	67 (100)
Laboratory examinations	63 (57.3)	29 (26.4)	6(5.5)	12 (10.9)	110 (100)
Compliance	22 (56.4)	6(15.4)	2(5.1)	9(23.1)	39 (100)
Adverse events	16 (23.5)	41 (60.3)	2(2.9)	9(13.2)	68 (100)
Informed consent	7(17.9)	3 (7.7)	5 (12.8)	324 (61.5)	39 (100)
Miscellaneous	5 (31.2)	6 (37.5)	32 (12.5)	3 (18.8)	16(100)
Total					693

Six hundred ninety—three separate items pointed out by the sponsors of clinical trials regarding our SDV procedures were analyzed. The concerns were first analyzed from the viewpoint of incorrect information entered into the source documents and/or CRF. Then, each entry was further analyzed to determine consistency between the source documents and CRF. Numbers in parentheses represent the percent of total number of problematic items for each entry.

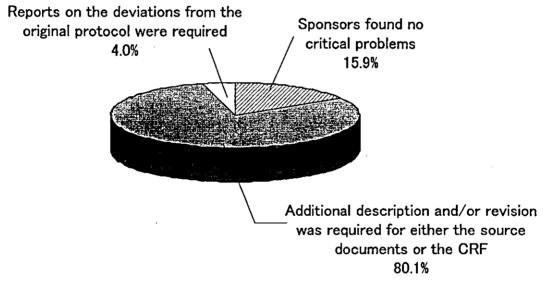


Fig. 2. Responses from Doctors to Claims from the Sponsors

We analyzed the responses from doctors regarding the 693 items pointed out by the sponsors of clinical trials regarding SDV procedures at University of Tokyo Hospital.

ed with patient history and/or complications (78 items, 66.1%), adverse events (41 items, 60.3%), and concomitant drugs and/or therapy (67 items, 46.2%). In contrast, the frequent lack of description in the source documents was associated with items concerning patient background (18 items, 19.8%), mattres regarding observation (11 items, 16.4%), and informed consent (5 items, 12.8%).

Concerning the 693 individual items, we surveyed each doctor responsible for the respective clinical trial regarding the claims raised by the sponsors. For 110 i-

tems (15.9%), the sponsors found no critical problems (Fig. 2). However, for 555 items (80.1%), additional description and/or revision was required for either the source documents or the CRF, and for 28 items (4.0%), reports on deviations from the original protocol were required (Fig. 2).

#### DISCUSSION

From the present survey results, we found that an item of concern was pointed out for 70.2% of the examined cases. Most were about an inconsistency be-

tween the source documents and CRF, regarding the description or lack of description in either the source documents or CRF (Fig. 1A).

The classification most frequently pointed out by the sponsors as problematic was use of concomitant drugs and/or therapy (Fig. 1B and Table 1), and we considered that one of the important factors for this result might be related to the CRF forms.<sup>2)</sup> We considered that many of the claims could be ascribed to the variety of types of information required on the CRF forms to describe the use of concomitant drugs and/or therapy, which was dependent on the sponsors and protocols utilized for clinical trials. It is proposed that application of uniform CRF forms for this information is required in order to maintain the quality and consistency of data presented.

Concerning the content of the problematic concerns pointed out by the sponsors, inconsistencies between the source documents and CRF were most frequently found for matters regarding observations, laboratory examinations, and compliance (Fig. 1B and Table 1). These inconsistencies were associated with misdescription of clinical data and/or items for evaluation in the CRF. Since it is possible that differences of description between the documents and CRF may have a large effect on the evaluation of cases, greater attention must be paid to accurately describe these items in the CRF.

It was also revealed that the frequent lack of description in the CRF was associated with items regarding patient history and/or complications, adverse events, and concomitant drugs and/or therapy. The fact that these points were described in the source documents indicates that the doctors did not elaborate on them in the CRF. In contrast, the frequent lack of description in the source documents was associated with items regarding patient background, observations, and informed consent. It is possible that the doctors described these items on the CRF, however, did not transcribe them to the source documents.

Our results showed that 96.0% of the concerns raised by the sponsors were not associated with serious problems or could be rectified by additional description and/or revision. However, for 4.0% of the claims, submission of a report regarding a deviation from protocol was required. These deviation cases, which were associated with such problems as a lack of patient data, alerted us to potential inaccura-

cies in the results of clinical trials.

In order to assure ethical and scientific aspects as well as the reliability of clinical trials, it is important to perform precise trials and give accurate data back to the sponsors, thus, a properly completed CRF is required. Ohashi et al.<sup>3)</sup> noted that it is necessary for hospitals to examine the verification rate, inconsistency rate, and deviation occurrence rate involved with SDV procedures, in order to evaluate the quality of data management in medical institutions. In the present study, we analyzed recent clinical trials performed by our institution by examining feedback reports submitted by sponsors. As a result, we found it necessary for our hospital staff to compare descriptions between the source documents and CRF in order to evaluate the quality of clinical trials.

The results of the present analysis suggest the necessity of good data management, including the accuracy of the various pieces of information required by sponsors, as well as consistency between the source documents and CRF. Recently, it was suggested that the involvement of clinical research coordinators would be effective for maintaining the quality of clinical trials.<sup>4)</sup> Since clinical research coordinators have begun to support the preparation of CRF forms in our hospital, it will also be necessary to examine their contribution toward solving the problems raised in the present study.

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-Regular Articles-

# Analysis of Information Submitted by Clinical Trial Sponsors regarding the Safety of Investigational Drugs

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During performance of clinical trials in medical institutions, information regarding the safety of investigational drugs is submitted by trial sponsors according to guidelines for good clinical practice. In the present study, reports of clinical trials conducted at the University of Tokyo Hospital were examined, focusing on the safety information provided to the Institutional Review Board (IRB). Two hundred two reports (52 protocols) of safety information were submitted to the IRB by clinical trial sponsors between April 2000 and March 2001, of which 185 contained a total of 3021 cases of adverse events. Of those, 194 reports were judged by clinical investigators/physicians not to be associated with any significant problems and the trials were continued. For 157 of those 194 reports, it was considered unnecessary to inform the test subjects of the report contents, including the adverse events. The decision of whether or not the test subjects should be informed of such contents tended to depend on the causal relationship between the adverse events and drug intake, as well as the predictability of the adverse events. For 8 of those 194 reports, the IRB recommended that the clinical investigators/physicians provide information to the test subjects and/or submit detailed information on the status of these subjects to the IRB. From these results, we suggest that establishment of a system to unify and evaluate drug safety information is necessary to provide safe and efficient clinical trials.

Key words-investigational drugs; safety information; clinical trials; IRB

#### INTRODUCTION

During performance of clinical trials in medical institutions, information regarding the safety of investigational drugs is submitted by the trial sponsors according to guidelines for good clinical practice. Investigators/physicians working at the University of Tokyo Hospital are required to submit their opinion in addition to relevant safety information to the Institutional Review Board (IRB). Based on the submitted materials, continuation of the clinical trials of the corresponding investigational drugs is discussed and determined by the IRB.

In the present study, reports of clinical trials conducted at the University of Tokyo Hospital were examined, focusing on the safety information provided for the examined drugs to the IRB. We also analyzed the correspondence submitted by the investigators along with the final judgment by the IRB regarding continuation/discontinuation of the respective study.

Based on the information obtained, the current status and problems associated with the management of safety information regarding investigational drugs are discussed.

#### **METHODS**

Contents of the Safety Information Provided to the All cases considered by the IRB regarding IRB new safety information offered by the sponsors of clinical trials in fiscal year 2000 (April 1, 2000 to March 31, 2001) were reviewed. For the protocol used for the investigational drugs, the report contents were classified as either an adverse event report or other. Further, the difference in number of reports of adverse events was compared between those associated with foreign developed investigational drugs and those associated with domestic development. We investigated the reported adverse events of each case and classified them based on the kind of information source, which included foreign and domestic postmarketing data, foreign and domestic clinical trial data, and published reports.

Correspondence of investigators regarding safety information and decision by the IRB We examined the contents of comments by the investigators/physicians attached to each report and determined whether they had informed the subjects who were receiving administration of the investigational drugs regarding the content of the respective report. The decision of the IRB regarding the continuation of clinical trials based upon the submitted reports was also examined.

#### RESULTS

Contents of Safety Information Examined by the IRB During the survey period, 202 reports (52 protocols) concerning safety information were submitted to the IRB by the sponsors of clinical trials, of which 185 (91.6%) contained a total of 3021 cases of adverse events, with each report containing from 1 to 120 cases (Fig. 1). The average number of adverse events per protocol was 69 for drugs with foreign development and 4 for those with domestic development (Fig. 2). Foreign post-marketing data, foreign clinical trial data, domestic post-marketing data, domestic clinical trial data, and published reports accounted for 80.6, 13.8, 2.6, 2.6, and 0.4%, respectively, of the sources of information (Table 1).

Correspondence of investigators regarding safety information and decisions by the IRB The opinions of the investigators/doctors included in the 202 reports on safety information are shown in Fig. 3. One hundred ninety four (96.0%) of these reports were judged by the investigators/physicians not to be

associated with any significant problems and the trials were continued. For 157 of those 194 reports, it was considered unnecessary to inform the test subjects of the contents, including the adverse events. Seven (3.5%) reports led to an alteration of the testing protocol and/or consent explanatory documents (Table 2).

Further investigation revealed that "an unknown or weak causal relationship between adverse events and drug intake", "known events with drugs that were described in the consent explanatory docu-

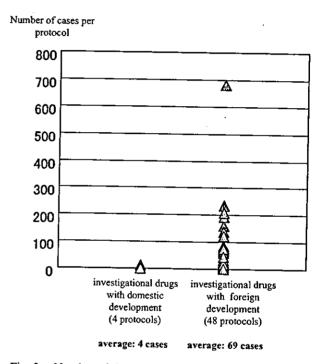


Fig. 2. Number of Cases of Adverse Events per Protocol

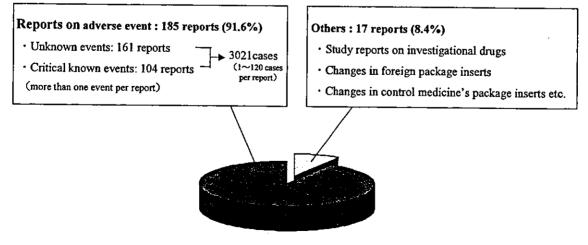


Fig. 1. Contents of Safety Information Examined by the IRB Two hundred and two reports for 52 protocols were analyzed.

ments", and "insufficient information regarding the adverse event" were most often listed as reasons by the investigators/physicians for not informing the test subjects of the respective report contents, while "unknown severe adverse events or unknown adverse events whose causal relationship with drugs cannot be denied", "unknown adverse events related with drugs", and "known, but severe adverse events related with drugs" were most often given as reasons for informing. In addition, reasons given for alterations of protocol and/or consent explanatory documents included "changes in foreign package inserts" and "appearance of reports of severe adverse events regarding the corresponding investigational drug".

Among the 202 reports examined in the present study, continuation of clinical studies was approved by the IRB for 194 (96.0%), whereas conditioned approval was given for the remaining 8 (4.0%). As for those given conditioned approval, the IRB recommended that the investigators/doctors provide information regarding the drugs to the test subjects and submit detailed information on the status of the subjects (Fig. 4).

Table 1. Sources of Information on 3021 Cases of Adverse Events

Source of information	Number of cases	(%)	
Foreign post-marketing data	2436	80.6%	
Foreign clinical trial data	416	13.8%	
Domestic post-marketing data	78	2.6%	
Domestic clinical trial data	79	2.6%	
Published reports	12	0.4%	
Total	3021	100.0%	

Table 2-1. Reasons Investigators Considered it Unnecessary to Inform the Test Subjects of Safety Information

Contents	Number of matters
Unknown or weak causal relationship	63
Known events	62
Insufficient information	48
No influence on occurrence frequency of adverse events	26
Difference in target disease	17
Others	7

One hundred and fifty seven reports were analyzed, some containing more than one reason.

Table 2-2. Reasons the Investigator Considered it Necessary to Inform the Test Subjects of Safety Information

Contents	Number of matters
Unknown severe adverse events or unknown adverse events whose causal relationship cannot be denied	14
Unknown events	10
Known, but severe adverse events	5
Known event influencing the patient's life	5
Others	3

Thirty seven reports were analyzed, some containing more than one reason.

Table 2-3. Reasons that Led to an Alteration of the Testing Protocol and/or Consent Explanatory Documents

Contents	Number of matters
Changes of foreign package inserts	4
Report of severe adverse reactions on investigational drugs	2
Changes of control medicine's package inserts	1

Seven reports were analyzed.

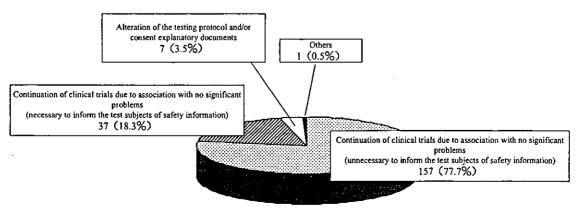


Fig. 3. Opinions of Investigators/Doctors on Safety Information (n=202)

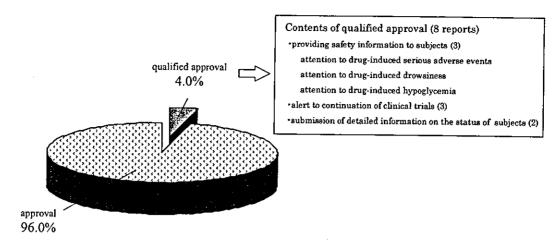


Fig. 4. Final Decisions of IRB on the Continuation of 202 Clinical Trials IRB examined 202 safety information reports and considered the investigator's opinion.

#### **DISCUSSION**

The method of safety information management regarding investigational drugs in clinical trials is determined by good clinical practice, as safety information is one of the most important factors for test subjects to determine their entry into or continuation of the trial. Safety information is also important for the IRB of each medical institution to discuss the continuation of clinical trials. However, the methods used by trial sponsors to report such information and medical institutions to manage these data have not been unified in Japan. For this reason, medical institutions have been attempting to determine how to point out problems associated with safety information of drugs, as well as manage such information, provide the appropriate information to test subjects, and judge whether or not the clinical trials should be continued based upon the submission of safety information.1-6)

Two hundred two reports regarding drug safety information were provided by clinical trial sponsors from April 2000 to March 2001, most of which included cases of adverse events that amounted to a total of 3021. The number of cases in each report ranged from 1 to 120. Further, the number of case reports for drugs with foreign development was 69, while there were 4 case reports for those with domestic development. Ninety percent or more of the sources of safety information had foreign origin, resulting from the fact that our hospital accepts many clinical studies of drugs that have been developed in foreign countries. In addition, since some of the

drugs with foreign origin have already been used in clinical practice in foreign countries, many pieces of safety information are available in foreign countries. The same situation has been reported by other Japanese institutes performing the clinical trials. Studies in Kanazawa University Hospital revealed that 82.4% of 1907 case reports on safety information submitted between April 1999 and November 2000 originated from foreign countries.2) In addition, in the International Medical Center of Japan, the survey of 140 case reports on safety information submitted between April 2000 and March 2001 revealed that 71. 8, 9 and 11% originated from foreign post-marketing data, foreign clinical trial data, domestic post-marketing data and domestic clinical trial data, respectively.6)

The investigators/physicians determined that most of the problems regarding safety information were not serious enough to consider discontinuation of clinical trials. However, approximately 20% of the submitted safety information was communicated to test subjects, of which a portion was associated with alterations in the consent explanatory documents. The final determination of whether or not the test subjects should be informed of such information tended to depend on the causal relationship between the adverse events and drug intake, as well as the predictability of adverse events. The important role of the IRB to perform safe clinical trials was suggested from the finding that for 4% of the reports the IRB recommended that the test subjects be informed of reported contents and the investigators/physicians reconsider the continuation of the clinical trials.

The results of the present study revealed that many pieces of safety information were submitted to our hospital, however, there is no unified system available in Japan to effectively manage such information. Without such system, it is difficult for the IRB to review all safety information in detail during the limited term and consequently, it is possible that test subjects can receive only limited pieces of safety information. In addition, it is possible that the IRBs in each institution may make a different judgement for the same safety information. In order to establish a high quality and uniform review system for the evaluation of investigational drugs, it is considered necessary to construct a system that uniformly manages and evaluates reports submitted to each medical institution, and/or to prepare national guidelines for such uniform evaluation.

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-Regular Articles-

# ICU/CCU における薬剤業務の展開と他の医療スタッフからの評価及び問題点の解析

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## Development and Evaluation of Pharmaceutical Services in the ICU/CCU by Medical Staffs

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Questionnaires were sent out to the staffs (13 physicians, 52 nurses and 5 medical engineers) of the ICU/CCU at the University of Tokyo Hospital, to evaluate pharmaceutical services by analyzing problems in the services offered. Four components of pharmaceutical services were evaluated: inventory control of drugs, check of drug usage and doses, mixing of injections, and offering drug information. Almost all responses from medical staffs evaluated pharmaceutical services overall as "good". The high response rate (96%) from the nursing staff was attributed to the fact that they were familiar with the pharmacist's role with drug inventory, and mixing injections, when nursing was not available for these tasks. Although 50% of physicians rated the pharmaceutical services of providing drug information as "good", this value was lower than responses on other items of the questionnaires, which suggests some dissatisfaction. The occurrences of drug information obtained by passive offering (121 subjects) was 4 times as common as drug information obtained by active offering (30 subjects). From this finding, and comments on the questionnaires from physicians, it suggests that physicians require more drug information for dosage regimens, and prefer the drug information to be provided more actively. Further, an important comment from physicians and nurses was that the services of pharmacists are not available on all shifts/all days of the week to provide consultation for drug information and mixing of injections. Although having a pharmacist available daily around the clock is desirable and ideal to the medical team, the number of pharmacists under the present system cannot support this. As a solution, we think that it is crucial that pharmacists educate medical staff when they are present to in order to optimize therapy and patient care over time.

Key words—ICU/CCU; pharmaceutical service; medical staff; drug inventory control; mixing of injection; drug information offering

#### 緒 言

診療報酬における救命救急入院料算定に要する算定基準には薬剤師配置の記載はなく、薬剤管理指導料の算定も認められていない現状では、救急医療の現場に薬剤師を配置することは困難であると考えられる.1)しかし、救急医療では疾患が多岐に渡り、個々の重症度も様々であるため、使用される薬品の種類が多く、その使用方法及び投与量も広範囲に渡

っている。2) また、症状の変化も急激であるため医薬品の確保と薬品情報提供は重要であり、正確さと同様に迅速さも要求される。これらのことから、救急医療の現場では薬剤師が医療チームの一員として患者の治療に関与する必要性がある。平成13年9月に竣工した東京大学病院新入院棟には、重症入院患者の治療を集中的に行うICU(8床、Intensive Care Unit)/CCU(6床、Coronary Care Unit)が新設された。薬剤部では本病棟の開設当初から運営に参画するとともに薬剤師2名が常駐して、1)薬品管理(主に注射薬)、2)指示書のチェック(用法・用量など)、3)注射薬の混合、4)他の医療スタッ

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フへの薬品情報提供を中心とした種々の薬剤業務を展開しており、その概略については既に報告している.<sup>3)</sup> 本研究では、ICU/CCU における薬剤業務について医師及び看護師などの他の医療スタッフを対象にアンケート調査を行い、問題点を解析することにより ICU/CCU における薬剤業務を確立することを目的とした。

# 方 法

- 1. 東京大学病院 ICU/CCU への入室患者の調査 入室患者は、三次救急により入院した患者、手術後 のリカバリー患者(生体肝移植手術、心臓外科手術 など)と HCU (High Care Unit) 病棟や一般病棟で 重症化した患者が対象となっており、症状の改善と ともに HCU や一般病棟に退出するか、あるいは退 院する、そこで、平成 13 年 9 月 22 日―14 年 1 月 31 日における入室患者の対象診療科、疾患名、在 室日数、年齢、入室元、退出先を調査した。
- 2. 薬剤業務の内容と業務量の調査 本病棟で は、原則として薬剤師2名が常駐して(平日8:00 **一17:00**) 薬剤業務を行っている。**ICU/CCU** での 薬物療法に用いる注射薬は主に病棟在庫を使用する ため、本病棟での薬品管理は注射薬が対象となる. 薬品管理の対象である在庫薬品の種類は、注射薬 244 品目, 外用薬 65 品目, 内用薬 10 品目であり. 薬品毎に発注点を設定して、在庫量を確認の上、薬 品倉庫に請求している。平日は3日分、休日前は5 日分の在庫量を目安としているが、患者の疾患やそ の重篤度に応じて大量に使用する薬剤については、 薬品倉庫と連絡をとって臨機応変に対応している. 薬剤師が不在の時間帯(平日 17:00-翌8:00、休 日)には、看護師又は医師が薬品棚から薬品を取り 出して使用することから、配列は薬効別にするとと もに同一成分一規格を原則とするなどして取り間違 いがないようにしている.

医師が作成した注射・処置指示書における注射薬については、担当薬剤師が用法・用量、配合変化などをチェックした後、病棟に設置されたクリーンベンチを用いて混合を行っているため、その混合業務量を調査した(平成13年10月—平成14年1月)、なお、注射薬の混合手順は、混合準備、混合、最終チェックの3行程からなる。

ICUとCCU各々、朝8:30からカンファレンス

が開かれ、患者の入室経緯と病態が説明されたのち に治療方針がディスカッションされる. 担当薬剤師 が1名ずつ両カンファレンスに出席し、薬剤につい ての質問に対応するとともに、薬剤の選択や用法・ 用量、副作用などについてコメントする。カンファ レンスで決定された治療方針を把握し、薬品管理と 注射薬の混合業務にリアルタイムで反映させる。他 の医療スタッフへの薬品情報提供は、薬剤師が病棟 にいる時間帯に随時行っている.そこで,平成 14 年1月の1ヵ月間に提供したカンファレンス以外で の薬品情報提供について、提供したスタッフの職 種, 提供方法(能動, 受動), 内容などに分類した. TDM 対象薬品については、薬剤部の薬物動態解析 室で測定・解析した TDM のデータと患者の腎・肝 機能などから TDM 担当薬剤師と協議した上で,必 要に応じて医師に対して処方設計の助言を行う. 平 成 14年1月の1ヵ月間の TDM における測定薬剤 と件数について調査した。

3. 薬剤業務についての他の医療スタッフへのア ンケート アンケートの内容を Fig. 1 に示した. ICU/CCU の医療スタッフの人数は、医師は、ICU 13 名(救急部常勤医師 8 名,非常勤医師 2 名,研 修医3名), CCU10名(心臓外科常勤医師5名と 循環器内科常勤医師5名)の計23名、その他のス タッフは, ICU と CCU 共通で, 看護師 54 名 (師 長1名, 副師長3名, 技官・非常勤職員50名), 薬 剤師 2 名, ME (メディカルエンジニア) 2 名とな っている. そのうちアンケートを依頼したスタッフ は,医師は ICU の 13 名,看護師 52 名,ME 5 名 (定期的に交替するため常駐する人員より多い) で あった. なお、CCU の医師は専属ではないため対 象から削除した、アンケートは職種のみのチェック で無記名とした. 内容は, 1) 病棟在庫薬の管理, 2) 指示書のチェック, 3) 注射薬の調製, 4) 薬剤 情報の提供, 5) 薬剤師に期待することの5項目で, 1) —4) の設問は, a. 良い, b. どちらともいえない, c. 改善の余地がある, d. わからない, の選択肢か ら選び、5)の設問は具体的な内容について記載で きるように設定した. アンケートは、平成14年3 月の上旬に配付し,配付してから1週間以内に病棟 に設置したアンケート箱に投函するか、薬剤師に手 渡すことにより回収した.

ICU/CCUのスタッフの皆様へ ICU/CCUにおける薬剤師の業務について、皆様の御意見をお聞かせ願います。 今後の業務改善の資料として使用させていただきます。よろしくお願いいたします。 薬剤部 ●●●●
あなたの職種をお答え下さい。 a.医師 b.医師(研修医) c.看護師 d.ME
薬剤師が現在病棟で行っている下記の業務についてどのように思いますか?  1. 病棟在庫薬の管理(在庫の補充、使用期限のチェック、在庫品目の調整など)  a. 良い → 特にどのようなところですか? (あればお書き下さい)  b. どちらともいえない  c. 改善の余地がある —   d. わからない
<ul> <li>2. 指示書のチェック (用法・用量、相互作用、書き忘れ・消し忘れなど)</li> <li>a. 良い ―――――――――――――――――――――――――――――――――――</li></ul>
a. 良い
<ul> <li>4. 質問への対応、薬剤情報の提供</li> <li>a. 良い ―――――――――――――――――――――――――――――――――――</li></ul>
5. 薬剤師にこれから期待すること (例:薬の使い方についてもっと意見を言って欲しい、注射薬の調製をもっと たくさん行って欲しい、などご自由にお書き下さい。)  【  なお、結果につきましては、集計後にお知らせいたします。 どうもありがとございました。

Fig. 1. The Contents of Questionnaire for Pharmaceutical Services in ICU/CCU to Other Medical Staffs

# 結 果

#### 1. 東京大学病院 ICU/CCU への入室患者

Table 1 に ICU/CCU 入室患者の対象診療科と主な疾患名を示した。約4ヵ月間の入室患者は ICU 156名, CCU 121名であった。ICU の対象診療科は23科であり、疾患も多岐に渡っていた。高い割合を占めていた診療科は脳神経外科(くも膜下出血、硬膜

下出血など) 35 名 (22.4%), 移植外科(生体肝移植など) 20 名 (12.8%), 精神神経科(薬物中毒など) 13 名 (8.3%) であった. 一方, CCUでは7診療科で,心臓外科(大動脈瘤術後,大動脈解離術後など) 83 名 (68.6%),循環器内科(急性心筋梗塞,心不全など) 34 名 (28.1%) でほとんどを占めていた. 入室患者の平均年齢は ICU 54 歳 (1—91 歳), CCU で

Table 1. The Clinical Division and Disease of the Patients in ICU and CCU (September 22, 2001—January 31, 2002)
(a) ICU

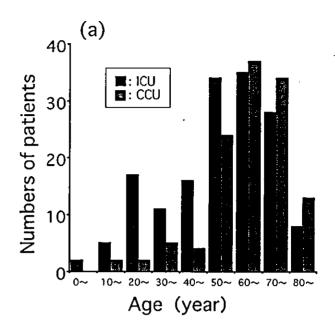
Clinical division	Patients	Main disease				
Neurosurgery	35( 22.4%)	Subarachnoidal bleeding, subdural bleeding				
Transplanta- tion surgery	20( 12.8%)	Post-living liver transplantation				
Neuropsy- chiatry	13( 8.3%)	Poisoning by drug				
Gastroenterol- ogy	10( 6.4%)	Hemorrhage of digestive tract, alcohol poisoning				
Orthopedic surgery	8( 5.1%)	Traffic injury				
Section of vas- cular surgery	8( 5.1%)	Post-operation of abdomi- nal aortic aneurysm				
Respiratory medicine	8( 5.1%)	Consciousness disorder, drowning				
Others (16 divisions)	54( 34.6%)	Burn				
Total	156(100.0%)					

A)	CCU
(b)	

Clinical division	Patients	Disease
Cardiovascular surgery	83 (68.6%)	Dissecting aneurysm, post- operation of thoracic aor- tic aneurysm
Cardiovascular medicine	34(28.1%)	Acute myocardial infarc- tion, cardiac failure
Others (5 divisions)	4( 3.3%)	
Total	121 (100.0%)	

は50歳以上が約90%であった (Fig. 2(a)). 平均在室日数はICU 5.8 日 (1—31 日), CCU 5.3 日 (1—30 日)であり,両セクションともに一般病棟の平均15 日以上に比べて短かった (Fig. 2(b)). Figure 3 には,平成13年9月—14年1月の本病棟への入室元と退室先を示した.ICU入室患者の入室元は救急外来が約60%,退室先は外科系HCUが約60%を占めた.CCU入室患者の入室元は救急外来(43%)ともに心臓外科術後の患者が40%,退室先は心臓外科病棟が約60%,内科系HCUが20%であった.

2. 薬剤業務の内容と業務量 平成 13 年 10 月 一平成 14 年 1 月における、1 日当たりの混合件数は 10 月  $36.4\pm23.5$  件 (mean  $\pm$  S.D., n=20)、11 月  $53.1\pm18.7$  件 (n=21)、12 月  $62.3\pm17.1$  件 (n=20)、1 月  $61.7\pm18.2$  件 (n=19) であった、生理食塩液又は 5%ブドウ糖液ボトルに溶解する注射薬



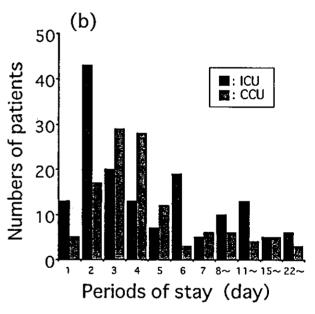


Fig. 2. Classification of the Patients in ICU/CCU by (a) Age and (b) Periods of Stay

Total patients in ICU: n=156 and CCU: n=121, September 22, 2001—January 31, 2002.

としては抗生物質が多く、シリンジに充填して持続 投与するものは、鎮静剤のドルミカム®、インシュ リンのヒューマリン®Rが多かった。強心剤のドパ ミンとドブタミン、麻酔薬のプロポフォールなどは シリンジに詰め替えずに市販容器にそのままライン をつけて投与するため混合の操作はなかった。

薬品情報提供については、薬剤師が常駐することにより、医師、看護師及び ME からの薬剤に関す

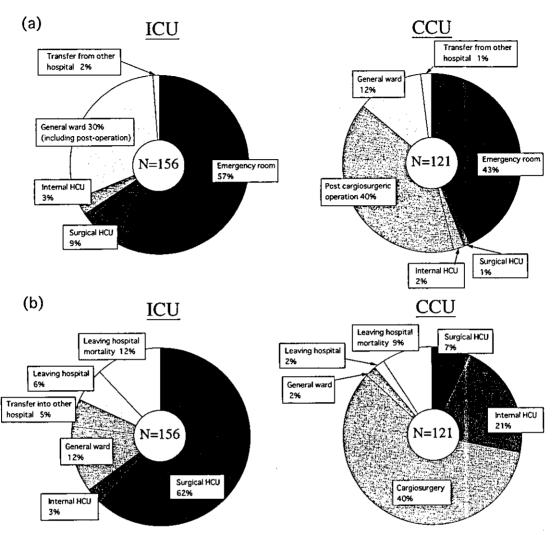


Fig. 3. The Places (a) from where the Patients Enter and (b) into where Leave in ICU (n=156) and CCU (n=121), September 22, 2001—January 31, 2002

る質問は随時受けることが可能となり、即座に回答できない場合には薬品情報室や調剤室などの他の部署の支援を受けて対応した。平成14年1月の情報提供の件数151件について、薬剤師が能動的に情報提供したもの(30件)と、他の医療スタッフから質問を受けて情報提供を行った受動的なもの(121件)に分けて分類した(Fig. 4).能動的情報提供の対象スタッフはほとんどが医師であり(97%)、その内容は用法・用量が36%と最も多く、TDM・投与設計が26%でついで多かった。一方、受動的情報提供の対象スタッフは医師が全体の約2/3(64%)、看護師が約1/3(35%)であり、能動的情報提供で多かった用法・用量(11%)、TDM・投与設計(14%)のほかに、配合変化・安定性・混合方法は25%、在庫や採用薬についてが13%、効能・効

果, 副作用, 相互作用は 11%であった. 平成 14年 1月の入室患者における TDM を行った患者は 11名で測定件数は 83件であり、その主な薬物はタクロリムスが 55件 (66%), バンコマイシンが 19件 (23%) であった.

3. 他の医療スタッフへの薬剤業務についてのアンケート ICU/CCU における薬剤師業務について他の医療スタッフへのアンケート調査の結果をTable 2 に示した. 回収率は, 医師が13名中8名(62%)で低かったが, 看護師(52名中50名:96%)とME(5名中5名100%)は高かった. 「病棟在庫薬の管理」では, 「良い」が医師75%(6名), 看護師74%(37名)であり,「改善の余地あり」が看護師で4%(2名), MEで20%(1名)であった. 「用法・用量などの指示書のチェック」, 及び

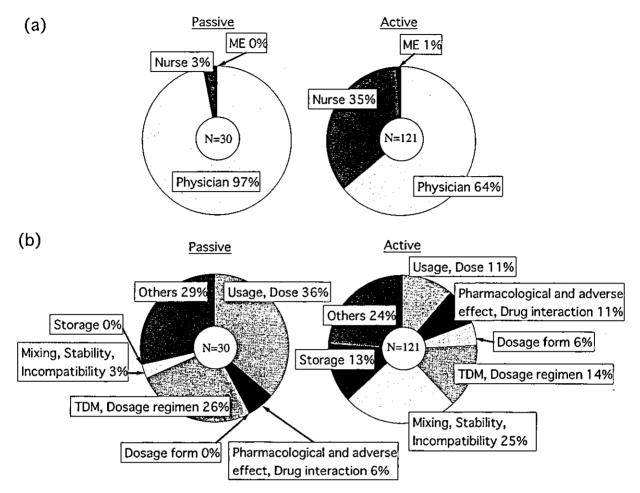


Fig. 4. Classification of (a) Medical Staffs and (b) Contents of Passive (n=30) and Active Offering of Drug Information (n=121) at January 2002

Table 2. The Answers of Questionnaire for Pharmaceutical Services in ICU/CCU to Other Medical Staffs

Answers*	Physician (ICU) n=8 (recovery rate: 62%)			Nurse n=50 (96%)				ME n=5(100%)							
		2	3	4	5	1	2	3	4	5	1	2	3	4	5
Drug inventory control		2	0	0	0	37	5	2	3	1	3	0	1	1	0
Check of usage, dose, drug interaction	6	0	0	1	1	38	6	1	5	0	4	0	0	0	1
Mixing of injection	7	0	0	0	1	41	5	1	3	0	5	0	0	0	0
Offering of drug interaction	4	2	1	1	0	40	5	1	4	0	3	0	1	1	0

<sup>\* 1:</sup> good, 2: normal, 3: subjects to improve, 4: no judgement, 5: no answer.

「注射薬の調製」については、すべての職種で「良い」が80%以上を占め、「改善の余地がある」は看護師の2%(1名)のみであった。「薬剤情報提供」においては、「良い」が看護師で82%(40名)であったが、医師50%(4名)とMEは60%(3名)であり、特に医師では25%(2名)、MEで20%(1名)「改善の余地あり」であった。以上の選択式設

問においては各職種から、すべての薬剤業務に対して、おおむね「良い」という評価を得たが、何名かにおいて「改善の余地あり」の意見が見られた。また、薬剤師に期待することとしては、現状の業務に満足をしながらも、「薬の使用については、気付いた点は遠慮なく指摘して欲しい(医師)」、「薬の相互作用、副作用、特に注射薬の指示書のチェックを

して欲しい (医師)」,「いつでも薬品情報を問い合わせできるようにして欲しい (医師)」,「注射薬の配合変化の一覧表を作って欲しい (看護師)」,「夜間・休日も病棟に常駐して注射薬の混合調製や在庫のチェックをして欲しい (看護師)」,「内服薬の残薬のチェックをして欲しい (看護師)」,「他の部署(手術部) における混合調製を行って欲しい (ME)」などの意見があった.

### 考 察

現在のところ、ICU/CCU における薬剤師による 病棟活動には保険点数が認められていないため、薬 剤師が ICU/CCU に常駐して薬剤業務を実施する 施設は極めて少ない、 当院においては ICU/CCU の新入院棟への移転の際に、病院側から薬剤部に対 して薬剤師のチーム医療への参画を求められたこと から、常駐による薬剤業務を開始した経緯がある. 救急医療は患者の救命という意味で医療の原点とも 言われ、チーム医療が最も必要とされているセクシ ョンであり、薬剤師が、薬品管理、注射薬の混合及 びリアルタイムの薬品情報提供を行うことにより、 救急医療における質の高い薬物療法を実現すること が可能となると考えられる。このことから、ICU/ CCU における薬剤業務の構築とその評価は、今 後、病院薬剤師の業務を展開する上で非常に重要で あると考えられる.

ICU/CCU入室患者の調査 (Table 1, Fig. 2, Fig. 3) では、対象診療科は ICU 23 科、CCU 7 科で併せるとほとんどすべての診療科に渡っていたことから、ICU/CCU は薬剤師が常駐することにより特定診療科に偏ることなく医療に貢献できる病棟であると言える、患者の年齢は CCU では 50 歳以上の患者が約 90%を占めており、高齢者に循環器系疾患が多いことが伺える、患者の入室元は救急外来から搬送された患者が約半数、CCU では特に手術室からの患者が約 40%であり、また病棟在室日数はICU、CCU ともに平均 1 週間以下であることから、本病棟が重篤な患者を対象としているが、病態がある程度回復すると他の病棟に速やかに移動していることが分かる。

入室対象患者の多くは Table 1 に示したように重 篤で病態が変動し易いため、注射薬については追加 や変更が多い、このことから ICU/CCU への注射

薬の供給方法は,前日に患者毎に薬剤部にオーダー して病棟に搬送する一般病棟で実施している方法で は問題があるため、必要時に病棟在庫から使用する 方法を多くの施設で採用している。したがって、常 駐する薬剤師には、必要なときに必要な量の医薬品 を提供することが求められる. 医薬品の品質確保と 適正な在庫数量の確保は、救急医療における薬剤師 の大きな役割であるとともに病院経営からも重要で ある。注射薬の投与は、ICU/CCU 専用の注射・処 置指示書より行われるが、その内容については病棟 に常駐する薬剤師がチェックすることにより適正な ものになると考えられる. 注射薬の混合について は、現在、高カロリー用輸液と抗悪性腫瘍剤以外に は、無菌製剤処理加算(40点)は認められていな いが、注射薬の混合を薬剤師が行うことで配合変化 や溶解後の安定性など薬剤の物理化学的性質を考慮 した品質の高い注射薬を患者に供給できると考えら れる. 夜間や休日の混合は看護師が行うため、薬剤 師が行う混合件数はすべて注射薬の約半数である が、従来はこれらの混合業務を看護師が行っていた ことを考慮すると、看護師の業務を軽減して患者ケ アに専念することを可能にしたと言える. 混合件数 は平均で60件/日前後であったが、重症度による変 動が大きく、ICU/CCU における注射薬混合業務量 は患者に依存して変化することが分かった.

薬品情報提供 (Fig. 4) は、薬剤師からの能動的 提供(30件)については薬剤師が指示書をチェッ クしたときの医師への疑義照会がほとんどであっ た. これは、本病棟では処方せんによる注射薬の供 給をしていないため注射薬調剤室での処方鑑査がな いこと、さらに本病棟における薬物療法に適応外使 用が多いことが理由として挙げられる.4 一方,他 の医療スタッフからの質問による受動的提供件数 (121件) は、能動的提供(30件)の約4倍であり、 薬剤師が常駐したことによって気軽に質問できる環 境が整ったと思われる. また, 受動的提供を行った 医療スタッフには看護師が 1/3 を占めており、その 内容は医師が投与設計に関することが多かったのに 対し、注射薬の混合方法や配合変化に関するものが 多いという結果であった. 薬剤師がいない夜間や休 日には、看護師が混合業務を行うことからこれらの 情報が必要となってくると考えられる。

以上の薬剤業務についての評価をアンケートによ