



2024

CDISC JAPAN
INTERCHANGE

TOKYO

12-13 JUNE: CONFERENCE & EXPO | 10-11 JUNE: TRAININGS

ICH M11 Guideline: A Breakthrough for Future Clinical Trials in the Data Society

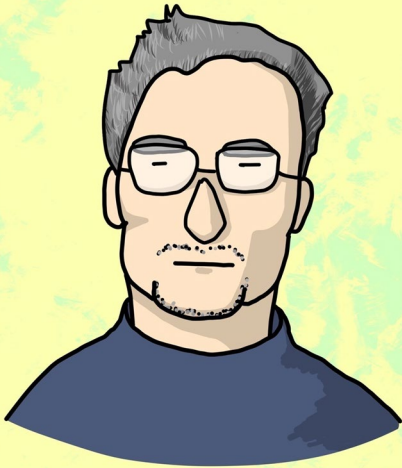
データ社会での臨床試験に向けたブレークスルー

Satoru Tsuchiya,

VP, Head of Global Data Design Office, Sumitomo Pharma, Co., Ltd.
Vice Chair, Data Science Expert Committee, Drug Evaluation Committee, JPMA

Meet the Speaker

Satoru Tsuchiya 土屋悟



Title: ICH M11 Guideline:
Expectations for Clinical Trials in the Data Society

Organization: Sumitomo Pharma, Co., Ltd.

Currently working as the Head of Data & Analytics function

Over 25 years of experience at Sumitomo Pharma, primarily as a biostatistician for clinical development

Professional community:

- ✓ Vice-chair of Data Science Expert committee of Drug Evaluation Committee, JPMA. (2016 -)
- ✓ Member of the Japan CDISC Coordinating Committee (J3C) (2014 - 2019)
- ✓ Topic Leader from JPMA of ICH-E9R1 EWG (2014 - 2022), ICH-M11 EWG (2021 -)
- ✓ Member of the Biometric Society of Japan

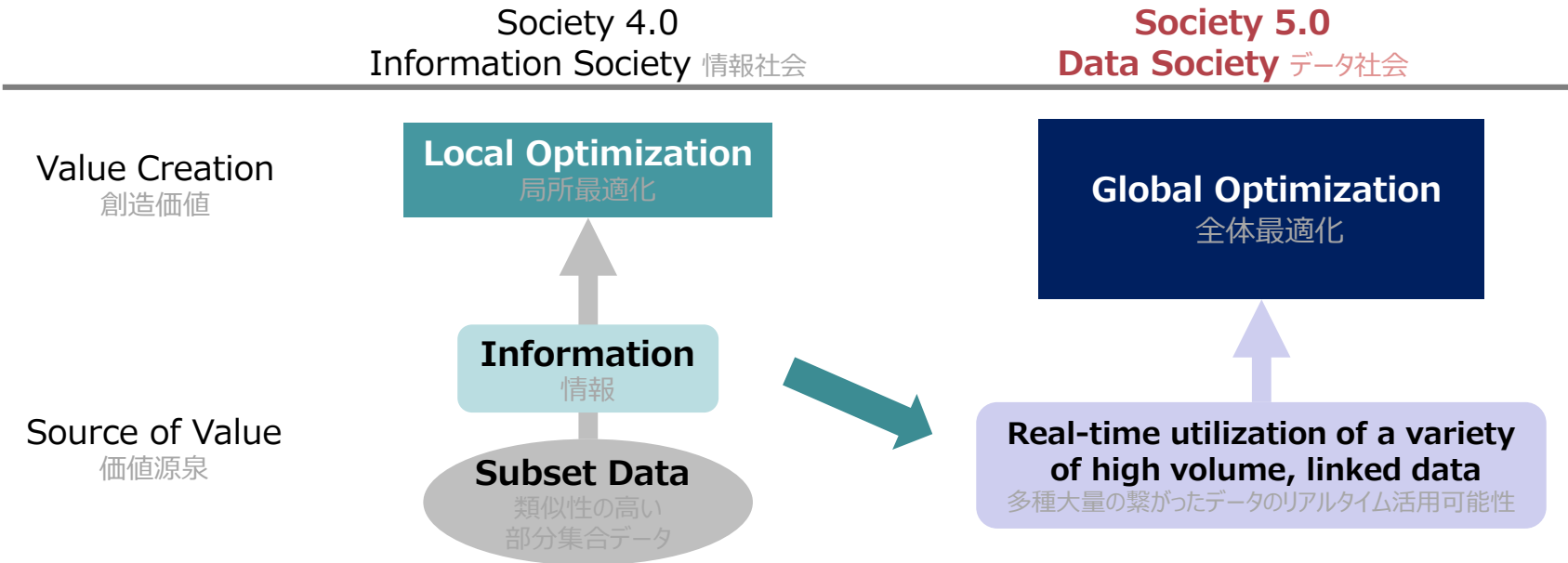


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- *The views and opinions expressed in this presentation are those of the author and do not necessarily reflect the official policy or position of CDISC or the organizations to which the author belongs.*
- *The author has no real or apparent conflicts of interest to report.*

Aiming to solve increasingly complex social issues

複雑化する社会課題の解決を目指す



NEC会長 遠藤信博氏 一部改変 <https://xtech.nikkei.com/atcl/nxt/special/18/00001/111200039/?P=2>

JPMA DS expert committee's Themes of Activity

JPMA DS部会の活動テーマ

1

Creating an infrastructure that enables the use of a wide variety of data

多種多様なデータの活用を可能にする基盤づくり

2

Business transformation through end-to-end data utilization

End-to-endのデータ活用による業務変革

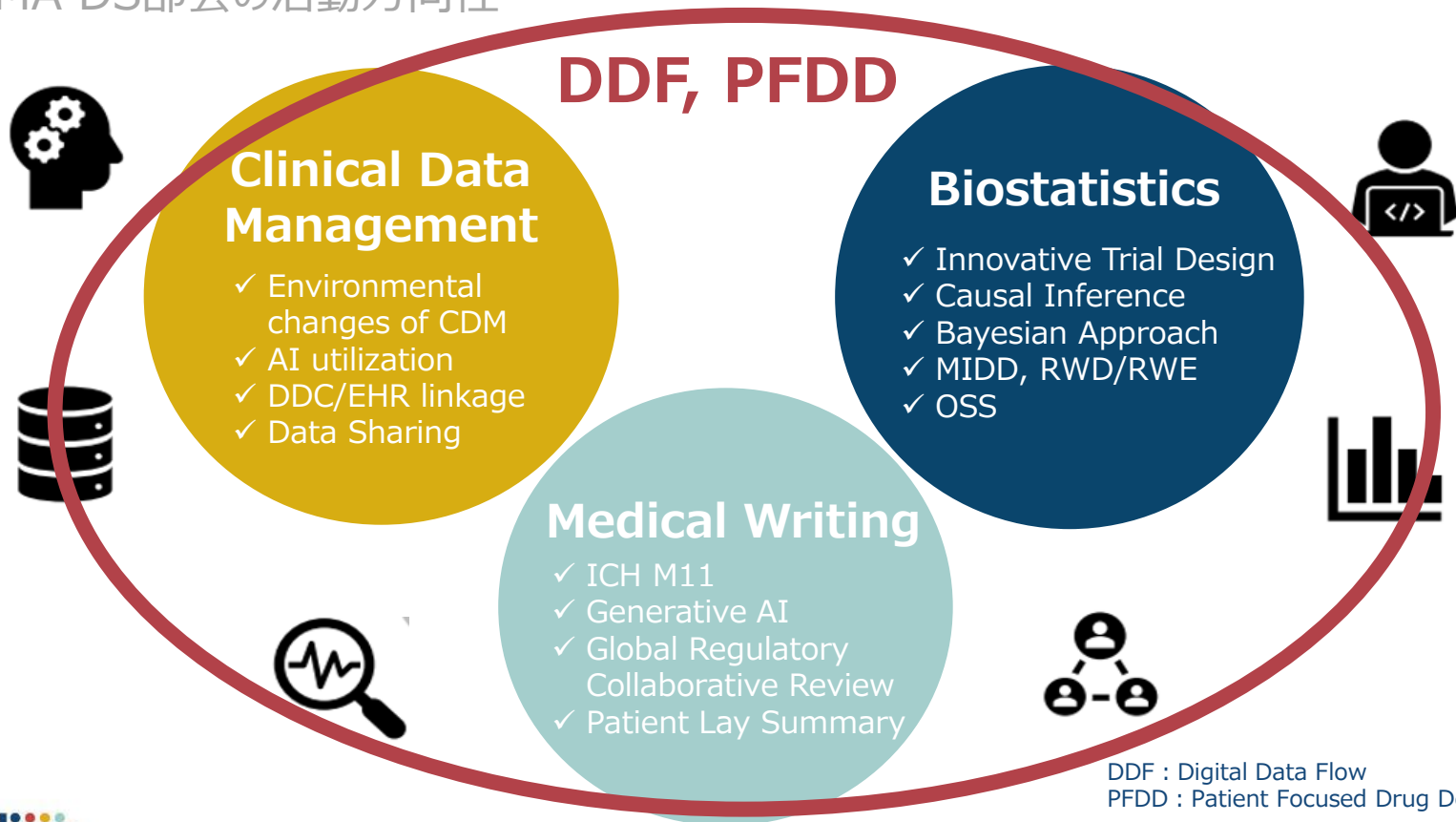
3

Evidence generation throughout the drug lifecycle

医薬品ライフサイクルを通じたエビデンス構築

New Direction of JPMA DS expert committee

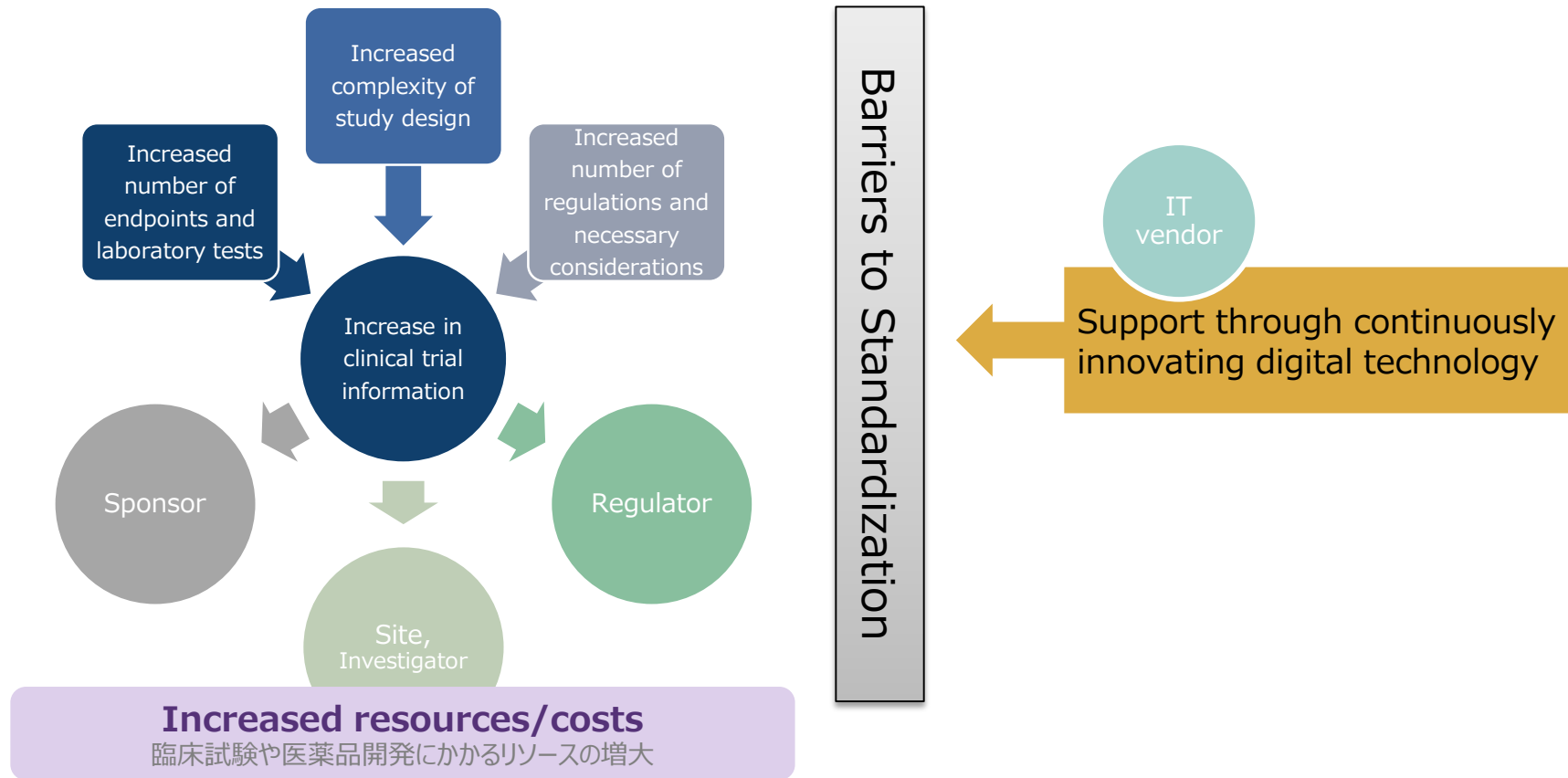
JPMA DS部会の活動方向性



DDF : Digital Data Flow
PFDD : Patient Focused Drug Development

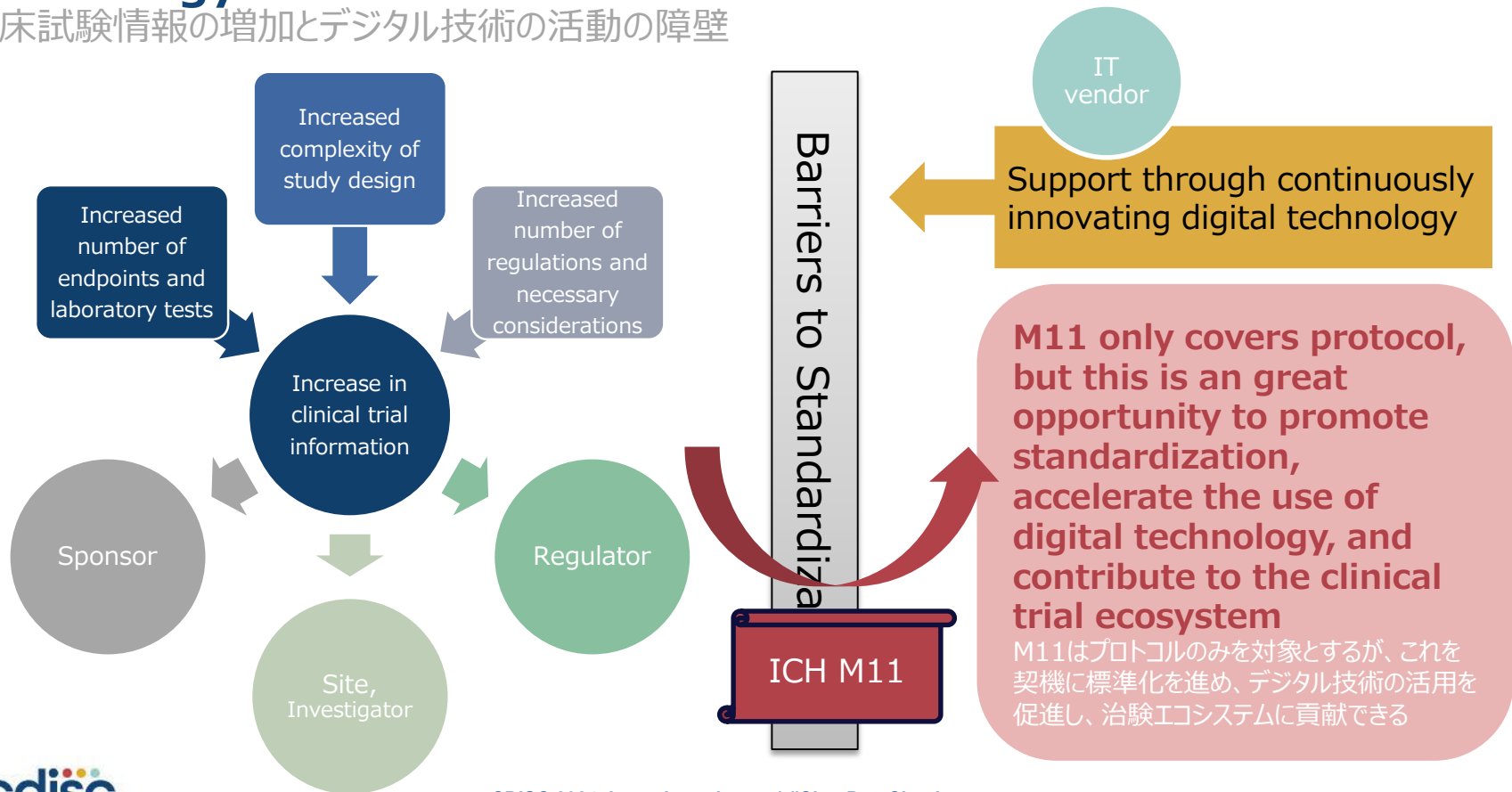
Increased clinical trial information and barriers to digital technology activities

臨床試験情報の増加とデジタル技術の活動の障壁



Increased clinical trial information and barriers to digital technology activities

臨床試験情報の増加とデジタル技術の活動の障壁





Agenda

1. ICH M11: Current state and work plan

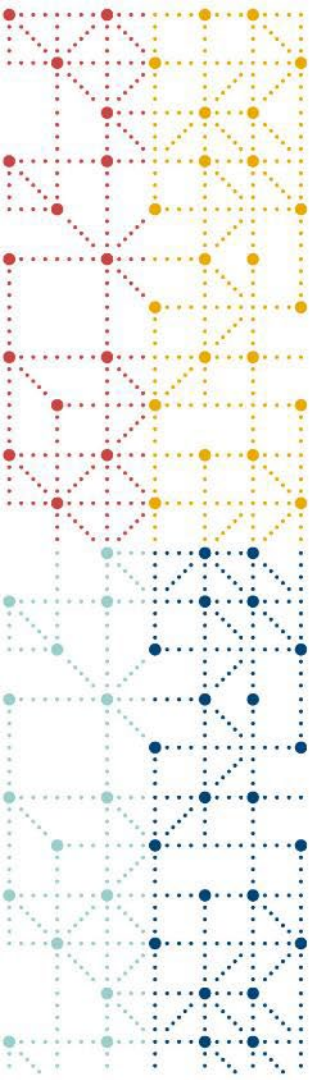
現状と今後の予定

2. Expectations for ICH M11 implementation

M11実装へ向けた期待

3. Agile Mindset for Digital Transformation

DXのためのアジャイルマインド



1. ICH M11: Current state and work plan

現状と今後の予定

ICH M11: Three deliverables...

1. **Guideline is a high-level document that:** ガイドライン本文

- Provides the background on why a harmonized clinical protocol template is needed, and
- Describes how the template and technical specification were developed.

2. **Template** テンプレート

- Includes identification of headers, common text, instructions, data fields and terminologies.

3. **Technical Specification** 技術仕様

- Serves as a technical representation of the ICH M11 protocol template.
- Aligns with the latest version of the ICH M11 guideline and template standard to enable electronic exchange of the clinical protocol information.

Example of structured document: CSR

ICH E3: Structure and Content of Clinical Study Reports

The image displays several overlapping pages from a Clinical Study Report (CSR) structured according to ICH E3. The pages are white with black text and are arranged in a way that shows different sections of the document. The visible sections include:

- 9. 試験の計画** (Study Design)
- 9.1 試験の全般的デザイン及び計画—記述** (General Design and Plan of the Study—Description)
- 9.2 対照群の選択を含む試験デザインについての考察** (Considerations on Study Design Including Selection of Control Group)
- 9.3 試験対象母集団の選択** (Selection of Study Population)
- 9.3.1 組み入れ基準** (Inclusion Criteria)
- 9.3.2 除外基準** (Exclusion Criteria)
- 9.3.3 患者の治療又は評価の打ち切り** (Discontinuation of Patient Treatment or Evaluation)
- 9.4 治療法** (Treatment)
- 9.4.1 治療法** (Treatment)
- 9.4.2 試験薬の同定** (Identification of Test Drug)
- 9.4.3 治療群への患者の割付け方法** (Method of Allocation of Patients to Treatment Groups)
- 9.4.4 試験における用量の選択** (Selection of Dose in the Study)
- 9.4.5 各患者の用量の選択及び投与時期** (Selection of Dose and Timing of Administration for Each Patient)
- 9.4.6 盲検化** (Blinding)
- 9.4.7 前治療及び併用療法** (Pre-treatment and Concomitant Therapy)
- 9.4.8 治療法の遵守** (Adherence to Treatment)

The pages also contain various tables, figures, and text blocks, including a table of contents and a list of abbreviations. The text is in Japanese, and the layout is clean and professional, typical of a clinical study report.

Example of structured and electronic document: CTD/eCTD

ICH M4: Organisation of the Common Technical Document for the registration of pharmaceuticals for human use

ICH M8: electronic Common Technical Document (eCTD)

第一 概要

近年、優れた医薬品の国際的な研究開発の促進及び患者
 供へはかるため、承認審査資料の国際的なハーモナイズ
 ーションが図られている。このような要請に応じたため、国
 際規制調和委員会（ICH）は議決され、新医薬品の承認申
 込（国際承認申請）（以下「CTD」という。）の設置
 は、承認申請書に添付すべき資料の編成作業の重複を削減
 における新医薬品にかかる情報の交換を促進し、もって有効
 医薬品の迅速な開発に資することを目的として、ICH に開

- (5) 起原文は常見の経緯及び開発に関する
- (6) 外国における使用状況等に関する資料
- (7) 臨床前報告一覽表
- (8) 届出文書（薬）
- (9) 一般的な物に関する文書

(3) 第一巻第一編等が国際承認申請書の主たる
 コンポーネントであること

2. 第 2 部（モジュール 2）：CTD の概要（サマリー）

- (1) 第 2 部（モジュール 2）から第 5 部（モジュール 5）の目次
- (2) 緒言
- (3) 品質に関する概括資料
- (4) 非臨床試験の概括評価
- (5) 臨床に関する概括評価
- (6) 非臨床試験の概要文及び概要表
 - ① 薬理
 - ② 薬物動態
 - ③ 毒性
- (7) 臨床概要
 - ① 生物薬剤学試験及び関連する分析法
 - ② 臨床薬理試験
 - ③ 臨床的有效性
 - ④ 臨床的安全性
 - ⑤ 参考文献
 - ⑥ 個々の試験のまとめ

ICH eCTD 仕様

概要

ICH eCTD は、ICH M4 第 2 巻第 1 編（CDER 2015 年 10 月）に
 基づく国際標準化された医薬品の技術情報（ICH M4 第 2 巻第 1 編）
 をデジタル形式で提供するための仕様である。ICH eCTD は、ICH M4
 第 2 巻第 1 編（CDER 2015 年 10 月）に基づいて開発され、ICH M4
 第 2 巻第 1 編（CDER 2015 年 10 月）に基づいて開発された電子
 申請書の構造と一致するものである。ICH eCTD は、ICH M4 第 2 巻第 1 編
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 2015 年 10 月）に基づいて開発された電子申請書の構造と一致する
 ものである。

特徴

ICH eCTD は、ICH M4 第 2 巻第 1 編（CDER 2015 年 10 月）に
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 2015 年 10 月）に基づいて開発された電子申請書の構造と一致する
 ものである。

構成

ICH eCTD は、ICH M4 第 2 巻第 1 編（CDER 2015 年 10 月）に
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 一致するものである。ICH eCTD は、ICH M4 第 2 巻第 1 編（CDER
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 ものである。

共通フォーマット

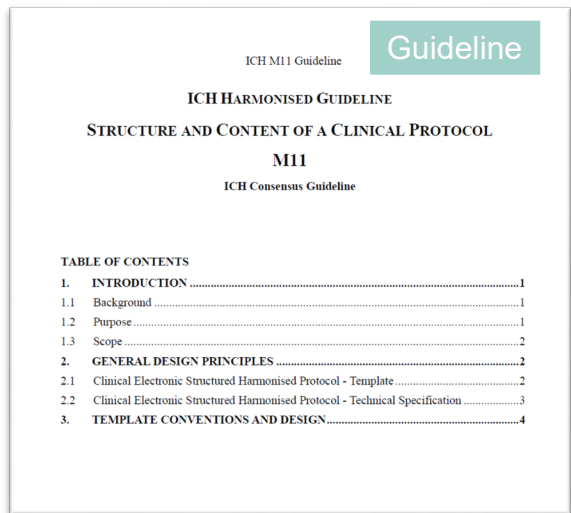
eCTD 申請に利用できる共通フォーマットは以下の通りである。

- 記述的：PDF (Portable Document File)
- 構造化：XML (Extensible Markup Language)
- グラフィック：可能な場合は常に PDF を用いる。次のフォーマットは、利用が適切な場合、あるいは PDF が使用できない場合に利用する：JPEG (Joint Photographic Experts Group)、PNG (Portable Network Graphics)、SVG (Scalable Vector Graphics)、および GIF (Graphics Interchange Format)。場合によっては、超高解像度に対応した特殊なフォーマットが適切なこともある。

Clinical Trial Protocol

ICH M11 aims to make clinical trial protocol both structured and electronic in a single guideline

ICH-M11は、単一のトピックで、治験実施計画書について構造化及び電子化の両方を目指す



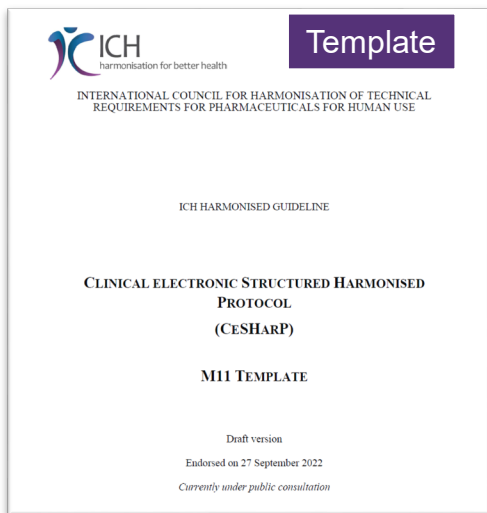
ICH M11 Guideline

Guideline

ICH HARMONISED GUIDELINE
STRUCTURE AND CONTENT OF A CLINICAL PROTOCOL
M11
ICH Consensus Guideline

TABLE OF CONTENTS

1. INTRODUCTION	1
1.1 Background	1
1.2 Purpose	1
1.3 Scope	2
2. GENERAL DESIGN PRINCIPLES	2
2.1 Clinical Electronic Structured Harmonised Protocol - Template	2
2.2 Clinical Electronic Structured Harmonised Protocol - Technical Specification	3
3. TEMPLATE CONVENTIONS AND DESIGN	4



ICH
harmonisation for better health

Template

INTERNATIONAL COUNCIL FOR HARMONISATION OF TECHNICAL
REQUIREMENTS FOR PHARMACEUTICALS FOR HUMAN USE

ICH HARMONISED GUIDELINE

CLINICAL ELECTRONIC STRUCTURED HARMONISED
PROTOCOL
(CESHARP)

M11 TEMPLATE

Draft version
Endorsed on 27 September 2022
Currently under public consultation



ICH
harmonisation for better health

Tech Spec

INTERNATIONAL COUNCIL FOR HARMONISATION OF TECHNICAL
REQUIREMENTS FOR PHARMACEUTICALS FOR HUMAN USE

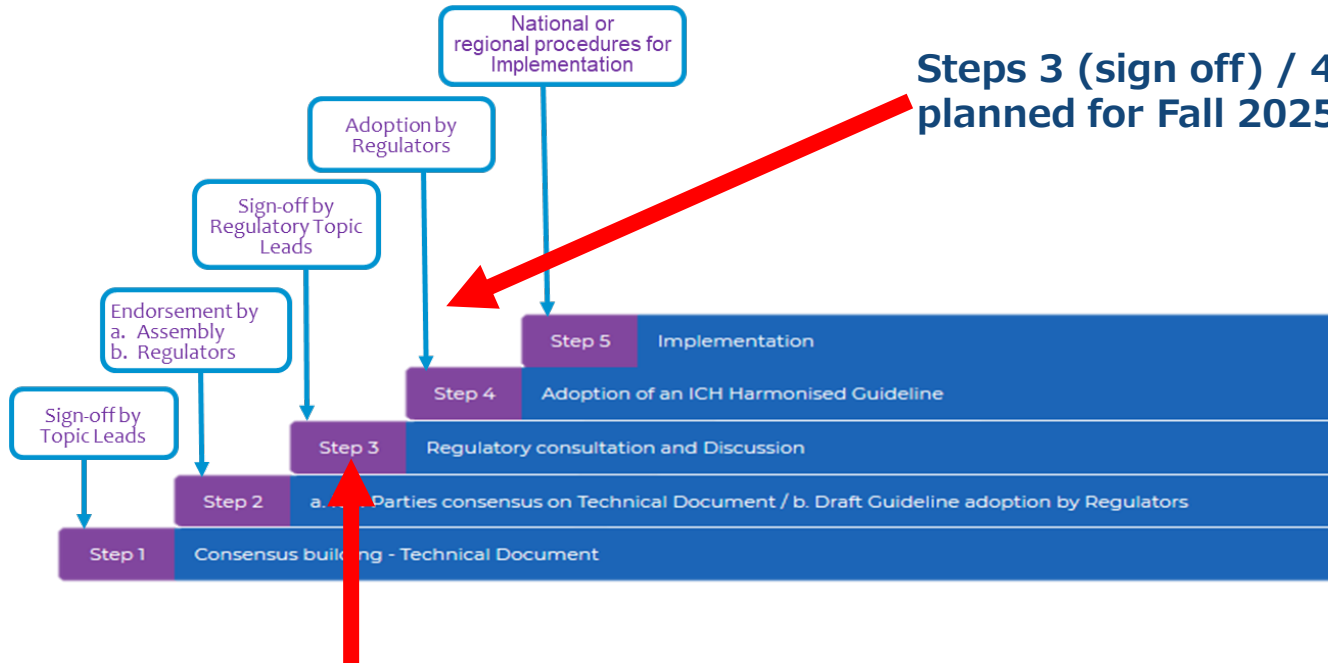
ICH HARMONISED GUIDELINE

CLINICAL ELECTRONIC STRUCTURED HARMONISED
PROTOCOL
(CESHARP)

M11 TECHNICAL SPECIFICATION

Draft version
Endorsed on 27 September 2022
Currently under public consultation

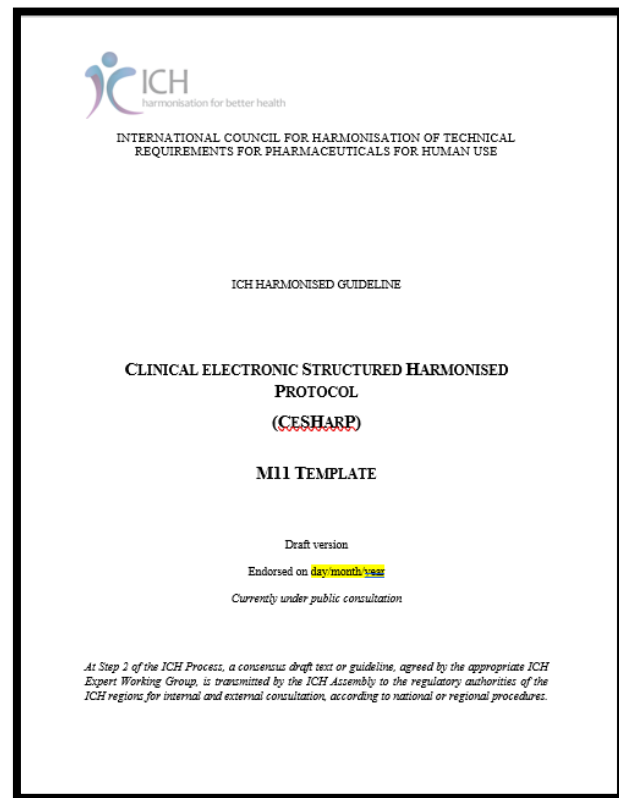
ICH step process

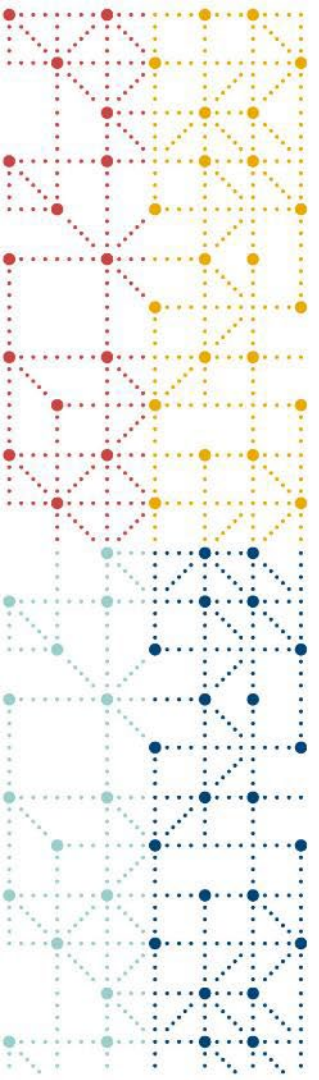


M11 is at Step 3 - Adjudication of Public Comments and Re-write of Guideline, Template and Technical Specification

ICH M11 Terminology

- **M11 / M2 collaborating with CDISC to create draft semantics for the *Protocol Template / Tech Specification***
 - ✓ Data Elements
 - ✓ Valid Value Sets / Terms
- **Regulatory public consultation of *Tech Specification* will be conducted in early 2025.**





2. Expectations for ICH M11 implementation

M11実装へ向けた期待

Value of ICH M11

M11の価値

ICH Protocol Template

- **Predictable**
 - ✓ Structure
 - ✓ Content
 - ✓ Level of detail
 - ✓ Presentation (of some content)
- **Provides flexibility where needed**
- **Common instructions**
- **Consistent with all other relevant ICH Guidelines**
- **Acceptable in all ICH countries**

Electronic, structured; Digital protocol

- **Foundational step toward a “digitized protocol”**
- Granular content can be exchanged, extracted, translated, reassembled, or processed as individual pieces or as a whole set
- Additional standards can be developed in the future by ICH or other SDOs to govern contents within the protocol
- Creates foundational requirements to enable informatics and software development

ICH E6 (R3) step2 (2023)

Appendix B. Clinical Trial Protocol and Protocol Amendment

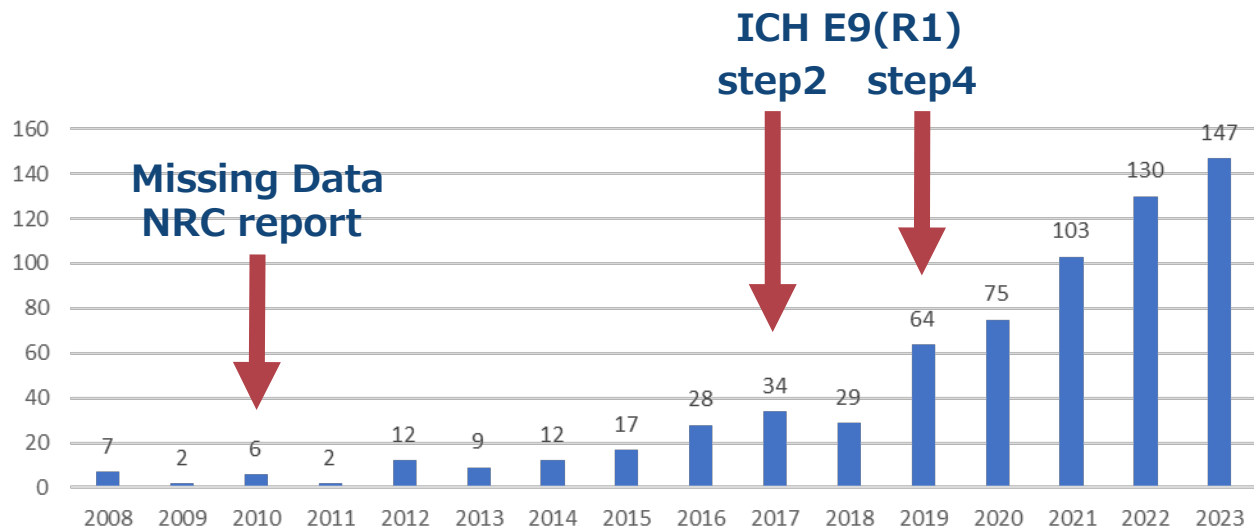
ICH E6(R3) Guideline	ICH E6(R3) Guideline	ICH E6(R3) Guideline	ICH E6(R3) Guideline
2542 Appendix B. CLINICAL TRIAL PROTOCOL AND PROTOCOL AMENDMENT(S)	2579 E9(R1) Addendum on Estimands and Sensitivity Analysis in Clinical Trials to the Guideline on Statistical Principles for Clinical Trials.	2613 (b) the type and timing of the data to be collected for withdrawn/discontinued participants, including the process by which the data are handled, in accordance with applicable regulatory requirements;	2650 B.10.3 The level of significance to be used or the threshold for success on the posterior probability in a Bayesian design.
2543 Clinical trials should be described in a clear, concise and operationally feasible protocol. The protocol should be designed in such a way as to minimise unnecessary complexity and to mitigate or eliminate important risks to the rights, safety, and wellbeing of trial participants and the reliability of data. Protocol development processes should incorporate input from relevant stakeholders, where appropriate. Building adaptability into the protocol, for example, by including acceptable ranges for specific protocol provisions, can reduce the number of deviations or in some instances the requirement for a protocol amendment. Such adaptability should not adversely affect participant safety or the scientific validity of the trial. For additional information, refer to ICH E6(R1) General Considerations for Clinical Studies and ICH E9 Statistical Principles for Clinical Trials.	2580	2614	2651
2544	2581 B.4 Trial Design	2615 (c) whether and how participants are to be replaced;	2652 B.10.4 The criteria for the termination of the trial and the criteria for the stopping of the trial.
2545	2582 The scientific integrity of the trial and the reliability of the results from the trial depend substantially on the trial design. A description of the trial design should include:	2616	2653 B.10.5 The selection of participants to be included in the planned analyses (e.g., all randomised participants, all dosed participants, all eligible participants, all evaluable participants).
2546	2583	2617 (d) the follow-up for participants who have discontinued the use of the investigational product.	2654
2547	2584 B.4.1 A specific statement of the primary endpoints and the secondary endpoints, if any, to be measured during the trial.	2618	2655 B.10.6 Procedures for accounting for missing, unused and spurious data.
2548	2585	2619 B.7 Treatment and Interventions for Participants	2656
2549	2586 B.4.2 A description of the type and design of trial to be conducted (e.g., double-blind placebo-controlled, parallel design, adaptive design, platform/umbrella/basket, trial with decentralised elements) and a schematic diagram of trial design, procedures and stages.	2620 B.7.1 The treatment(s) to be administered, including the name(s) of all the product(s), the dose(s), the dosing schedule(s), the criteria for dose adjustments, the route (mode)s of administration and the treatment period(s), including the follow-up period(s) for participants for each investigational product treatment/trial treatment group/arm of the trial.	2657 B.10.7 Statement that any deviation(s) from the statistical analysis plan will be described and justified in the clinical study report.
2550	2587	2621	2658
2551	2588	2622	
2552	2589 B.4.3 A description of the measures taken to minimise/avoid bias, including:	2623	
2553	2590	2624	
2554	2591 (a) Randomisation	2625 B.7.2 Medication(s)/treatment(s) permitted (including concomitant and rescue medication) and not permitted before and/or during the trial.	
2555	2592	2626	
2556	2593 B.4.4 A description of the trial treatment(s) and the dosage and dosage regimen of the investigational product(s), including a description of the dosage form, packaging and labelling.	2627 B.7.3 Strategies to monitor the participant's adherence to treatment.	
2557	2594	2628	
	2595	2629	
B.1 General Information	2596 B.4.5 The expected duration of the participant's involvement in the trial and a description of the sequence and duration of all trial periods, including follow-up, if any.	2630 B.8 Assessment of Efficacy	
2559 B.1.1 Protocol title, unique protocol identifying number, and date. Any amendment(s) should also bear the amendment number(s) and date(s).	2597	2631 B.8.1 Specification of the efficacy parameters, where applicable.	
2560	2598 B.4.6 A description of the "stopping rules" or "discontinuation criteria" and "dose adjustment" or "dose interruption" for individual participants, parts of trial and entire trial.	2632 B.8.2 Methods and timing for assessing, recording and analysing of efficacy parameters. Where any trial-related committees (e.g., independent data monitoring committee (IDMC)/judication committees) are utilised for the purpose of assessing efficacy data, procedures, timing and activities should be described in the protocol or a separate document.	
2561 B.1.2 Name and address of the sponsor.	2599	2633	
2562 B.1.3 Name and title of the person(s) authorised to sign the protocol and the protocol amendment(s) for the sponsor.	2600	2634	
2563	2601 B.4.7 Accountability procedures for the investigational product(s), including the placebo(s) and other comparators(s), if any.	2635	
B.2 Background Information	2602	2636 B.9 Assessment of Safety	
2564 B.2.1 Name and description of the investigational product(s).	2603 B.4.8 Maintenance of treatment randomisation codes and procedures for breaking codes.	2637 B.9.1 Specification of safety parameters.	
2565	2604	2638 B.9.2 The methods, extent and timing for recording and assessing safety parameters. Where any trial-related committees (e.g., IDMC) are utilised for the purpose of assessing safety data, procedures, timing and activities should be described in the protocol or a separate document.	
2566 B.2.2 A summary of findings from nonclinical studies that potentially have clinical significance and from clinical trials that are relevant to the trial.	2605 B.5 Selection of Participants	2639	
2567	2606 B.5.1 Participant inclusion criteria.	2640	
2568 B.2.3 Summary of the known and potential risks and benefits, if any, to human participants.	2607 B.5.2 Participant exclusion criteria.	2641 B.9.3 Procedures for obtaining reports of and for recording and reporting adverse event and intercurrent events; see ICH E9(R1).	
2569 B.2.4 Description of and justification for the route of administration, dosage, dosage regimen and treatment period(s).	2608	2642	
2570	2609 B.5.3 Mechanism for pre-screening, where appropriate, and screening of participants.	2643 B.9.4 The type and duration of the follow-up of participants after adverse events.	
2571 B.2.5 A statement that the trial will be conducted in compliance with the protocol, Good Clinical Practice (GCP) and the applicable regulatory requirements).	2610	2644	
2572	2611 B.6 Withdrawal of Consent or Discontinuation of Participation	2645	
2573 B.2.6 Description of the population to be studied.	2612 A clear description of the scientific objectives and the purpose of the trial. Information on estimands, where appropriate, if not included in any other trial-related document, should be specified.	2646	
2574 B.2.7 References to literature and data that are relevant to the trial and that provide background for the trial.		2647	
2575		2648	
2576 B.3 Trial Objectives and Purpose		2649	
2577 A clear description of the scientific objectives and the purpose of the trial. Information on estimands, where appropriate, if not included in any other trial-related document, should be specified.		2650	
2578		2651	

✓ E6 (R3) specifies what to include in the protocol, including estimands. Estimand含め、E6 (R3)では、プロトコルに含める内容を規定

Estimand

✓ A precise description of the treatment effect reflecting the clinical question posed by the trial

試験の目的によって提起される臨床的疑問を反映する治療効果の詳細な説明



Number of articles: PubMed: search = "estimand"

Estimand in published protocols of RCTs: Urgent improvement needed (Kahan 2021)

This article reviewed the 50 most recently published protocols in *Trials* and *BMJ Open* on the date of our search (October 20, 2020), in order to evaluate the description of estimands in trial protocols nearly 1 year after the final version and 3 years after the draft version of the ICH E9(R1) Addendum was published. We chose *Trials* and *BMJ Open* as they publish the majority of RCT protocols.

2020年10月に、TrialとBMJ Openで公開された直近50試験のプロトコルをレビュー

Description of Overall Estimand from 50 published protocols in 2020

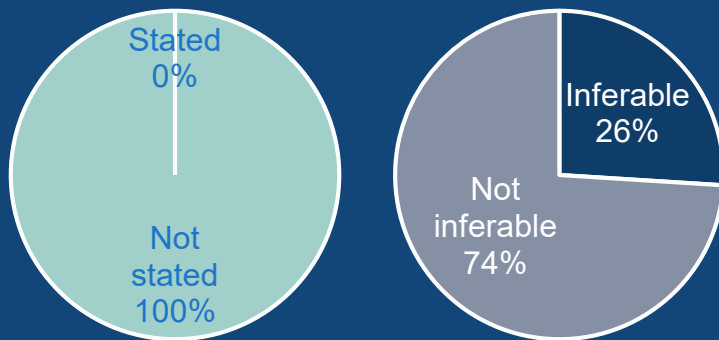


Table 3 Description of the primary estimand

Question	Trials (n = 50)—no. (%)
Used term "estimand"	0 (0%)
Cited ICH E9(R1) Addendum	0 (0%)
Estimand attributes	
Population	
Stated	0 (0%)
Inferable	32 (64%)
Not inferable	18 (36%)
Treatment condition(s)	
Stated	0 (0%)
Inferable	40 (80%)
Not inferable	10 (20%)
Outcome	
Stated	50 (100%)
Inferable	0 (0%)
Not inferable	0 (0%)
Population-level summary measure	
Stated	0 (0%)
Inferable	33 (66%)
Not inferable	17 (34%)
Handling of intercurrent event(s)	
Stated	0 (0%)
Inferable	20 (40%)
Not inferable	30 (60%)
Overall estimand	
Stated	0 (0%)
Inferable	13 (26%)
Not inferable	37 (74%)
Number of attributes not inferable	
0	13 (26%)
1	14 (28%)
2	9 (18%)
3	13 (26%)
4	1 (2%)
5	0 (0%)

Current developments of the estimand concept (Fierenz 2024)

authors	year	title	content
Strategies for handling intercurrent events			
Darken et al.	2020	The attributable estimand: A new approach to account for intercurrent events	Attributable Estimand: chose the strategy based on the relation of the ICE to the outcome
Michiels et al.	2021	A novel estimand to adjust for rescue treatment in randomized clinical trials	Balanced strategy for ICE; ICE occurrence independent of treatment arm
Qu, Lipkovich	2021	Implementation of ICH E9 (R1): A Few Points Learned During the COVID-19 Pandemic	Analyses of the different strategies, and considerations on two ICEs at the same time
Methods for different strategies			
Ratitch et al.	2018	Points to consider for analyzing efficacy outcomes in long-term extension clinical trials	
Wang et al.	2018	An evaluation of the trimmed mean approach in clinical trials with dropout	
Keene	2019	Strategies for composite estimands in confirmatory clinical trials: Examples from trials in nasal polyps and steroid reduction	
Magnusson et al.	2019	Bayesian inference for a principal stratum estimand to assess the treatment effect in a subgroup characterized by postrandomization event occurrence	
Roger et al.	2019	Treatment policy estimands for recurrent event data using data collected after cessation of randomised treatment	
Wie et al.	2021	Properties of Two While-Alive Estimands for Recurrent Events and Their Potential Estimators	
Lipkovich et al.	2022	Using principal stratification in analysis of clinical trials	
Mao	2022	Nonparametric inference of general while-alive estimands for recurrent events	
Han, Zhou	2023	Defining estimands in clinical trials: A unified procedure	
Wang et al. (b)	2023	Statistical methods for handling missing data to align with treatment policy strategy	
Application of estimands in different trial designs			
Okwuokwye, Peace	2019	Adaptive Design and the Estimand Framework	
Rufibach	2019	Treatment effect quantification for time-to-event endpoints—Estimands, analysis strategies, and beyond	
Kilpatrick et al.	2020	Estimands and inference in cluster-randomized vaccine trials	
Ring et al.	2020	The potential of the estimands framework for clinical pharmacology trials: Some discussion points	
Collignon et al.	2022	Estimands and Complex Innovative Designs	
Kahan et al.	2022	Estimands for factorial trials	
Li et al.	2022	Estimands in observational studies: Some considerations beyond ICH E9 (R1)	
Fu et al.	2023	Application of estimand framework in ICH E9 (R1) to vaccine trials	
Kahan et al.	2023	Estimands in cluster-randomized trials: choosing analyses that answer the right question	
Ren et al.	2023	Estimand in benefit-risk assessment	
Wang et al. (a)	2023	Application of estimand framework in ICH E9 (R1) to safety evaluation	
Further estimand related topics			
Fang et al.	2021	Sample Size Calculation When Planning Clinical Trials with Intercurrent Events	
Kahan et al.	2021	Estimands in published protocols of randomised trials: urgent improvement needed	
Cro et al.	2022	Evaluating how clear the questions being investigated in randomised trials are: systematic review of estimands	
Kang et al.	2022	Incorporating estimands into clinical trial statistical analysis plans	
Lynggaard et al.	2022	Principles and recommendations for incorporating estimands into clinical study protocol templates	

Table S1 Overview of the literature research

- ✓ Different modified strategies for intercurrent events are presented, as well as examples of methods to implement the estimand in clinical studies. 中間事象に対する異なる戦略や、estimandを実装するための方法の例示が報告されている
- ✓ The article reflects that the estimand is an ongoing research field with further exploration. Estimandは、現在進行中の研究分野であり、さらなる検討が必要

Impact on Quality

- **57% of Phase II – III protocols¹ are amended at least once**
 - Substantial global protocol amendments
 - 57% of protocols had at least one substantial amendment
 - 45% of these amendments were deemed “avoidable”
- **In U.S., cost to implement a substantial amendment was \$141,000 for Phase II protocol and \$535,000 for a Phase III protocol**
- Protocol amendment review is a tedious manual process during clinical trial application review (IND/CTA) or at the time of NDA/MAA: Efficiency gain here would be helpful

¹ The Impact of Protocol Amendments on Clinical Trial Performance and Cost
Kenneth A. Getz, et al, <https://doi.org/10.1177/2168479016632271>

Expectations for ICH M11 implementation

M11実装への期待

ICH Protocol Template

- **Predictable**
 - ✓ Structure
 - ✓ Content
 - ✓ Level of detail
 - ✓ Presentation (of some content)
- **Provides flexibility where needed**
- **Common instructions**
- **Consistent with all other relevant ICH Guidelines**
- **Acceptable in all ICH countries**

Electronic, structured; Digital protocol

- **Foundational step toward a “digitized protocol”**
- Granular content can be exchanged, extracted, translated, reassembled, or processed as individual pieces or as a whole set
- Additional standards can be developed in the future by ICH or other SDOs to govern contents within the protocol
- Creates foundational requirements to enable informatics and software development

Why Global Data Standard? (Komiyama 2020)

世界標準のデータ標準の意義

RSMP vol.10 no.3, 169-174, Sep 2020

特集 (臨床試験の電子データ標準化と活用)

製薬企業における臨床試験データの CDISC 標準化

Standardization of Clinical Trial Data in Japanese
Pharmaceutical Companies

小宮山 靖^{1,4,*}, 淡路 直人^{1,5}, 土屋 悟^{1,6},
橋尾 美穂^{1,7}, 鈴木 正人^{2,8}, 月田あづさ^{3,9}

Osamu KOMIYAMA, Naoto AWAJI, Satoru TSUCHIYA,
Miho HASHIO, Masato SUZUKI and Azusa TSUKIDA

Abstract

Regulatory authorities in Japan and US, i. e., PMDA and FDA, have mandated the submission of electronic data according to CDISC standards at the time of new drug application. That has had a major impact on the Japanese pharmaceutical industry. The world-wide data standards for clinical trial data, i. e., CDISC, should bring significant benefits for us, i. e., 1) reusability, 2) interoperability, and 3) an ability to integrate data from different sources and obtain a knowledge beyond a single clinical trial. However, the industry has not fully reaped such benefits. This is mainly because currently we are spending a lot of resources on converting data from completed clinical trials, which did not comply with CDISC standards, into CDISC-compliant data. We should move away from the data conversion just before the new drug application and hasten the end-to-end implementation of the CDISC standard. What we, the pharmaceutical companies, expect from PMDA is that PMDA will conduct many regulatory science studies, which is possible only with accumulated data, and that PMDA will continue to provide feedback to companies and researchers who are developing drugs, and that PMDA will continue to disseminate useful information to the world.

https://www.jstage.jst.go.jp/article/rsmp/10/3/10_169/_article/-char/ja/

1. Reusability 再利用を可能にする力
2. Interoperability 相互利用を可能にする力
3. Ability to integrate and utilize data from different studies

異なる試験のデータを併合し活用していく力



Generative AI
LLM



Sponsor perspective: Use case of using Protocol Information (Ito 2024)

治験依頼者によるプロトコル情報の活用イメージ

MSD株式会社 伊藤友香

プロトコル情報の利活用イメージ - 治験依頼者の期待 -

Sponsor can focus on core trial design from **scientific and quality** perspective - rather than the administrative details of document.



施設スタッフ・試験参加者

Easy-to-understand protocol: Better quality and efficiency in study conduct by **site staff**. = Benefit to **study participants**.

Easy-to-search information across different clinical trials.



臨床試験プロトコル
Standardized and Machine-readable



行政・審査員

Easy-to-understand protocol: Better understanding of protocols **by reviewers**

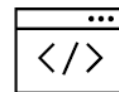


治験届

臨床試験情報登録



Efficient system entry at **Sponsor**.



症例報告書の仕様
統計解析プログラム

Efficient development of data flow at **Sponsor**.



試験関連文書

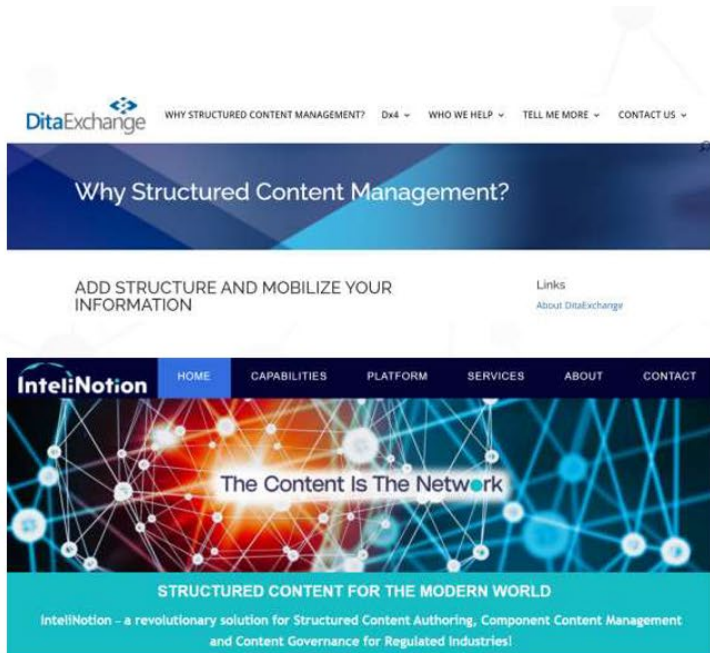
Efficient development of trial documents (IB, CSR, CTD, ...etc.) at **Sponsor**.



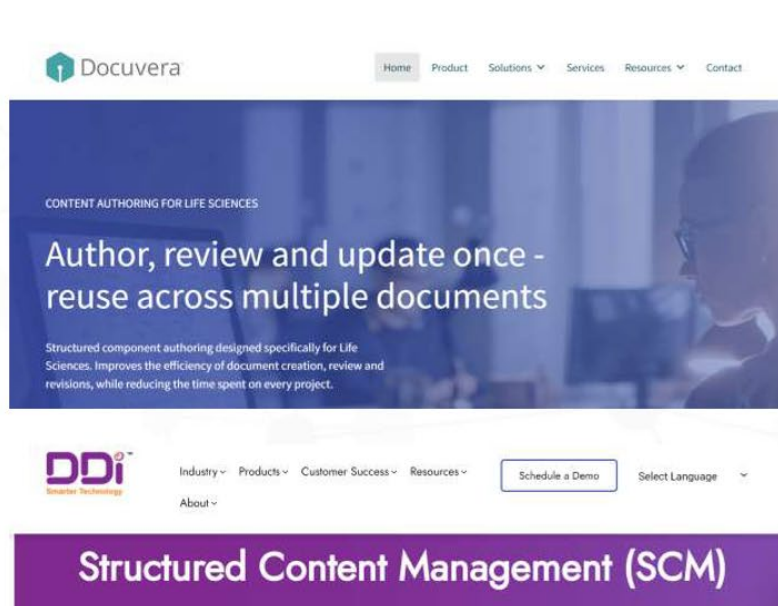
患者・一般市民

Easy-to-understand and **better** access to clinical trial information for **patients and public**

Structured Content Management/Authoring (SCM/A)



The screenshot shows the DitaExchange website. At the top, there is a navigation menu with the following items: "WHY STRUCTURED CONTENT MANAGEMENT?", "Dx4", "WHO WE HELP", "TELL ME MORE", and "CONTACT US". The main heading is "Why Structured Content Management?". Below this, there is a sub-heading "ADD STRUCTURE AND MOBILIZE YOUR INFORMATION" and a "Links" section with "About DitaExchange". The bottom part of the screenshot shows the IntelliNotion website with a navigation menu: "HOME", "CAPABILITIES", "PLATFORM", "SERVICES", "ABOUT", and "CONTACT". The main heading is "The Content Is The Network" and the sub-heading is "STRUCTURED CONTENT FOR THE MODERN WORLD". Below this, there is a description: "IntelliNotion - a revolutionary solution for Structured Content Authoring, Component Content Management and Content Governance for Regulated Industries!".

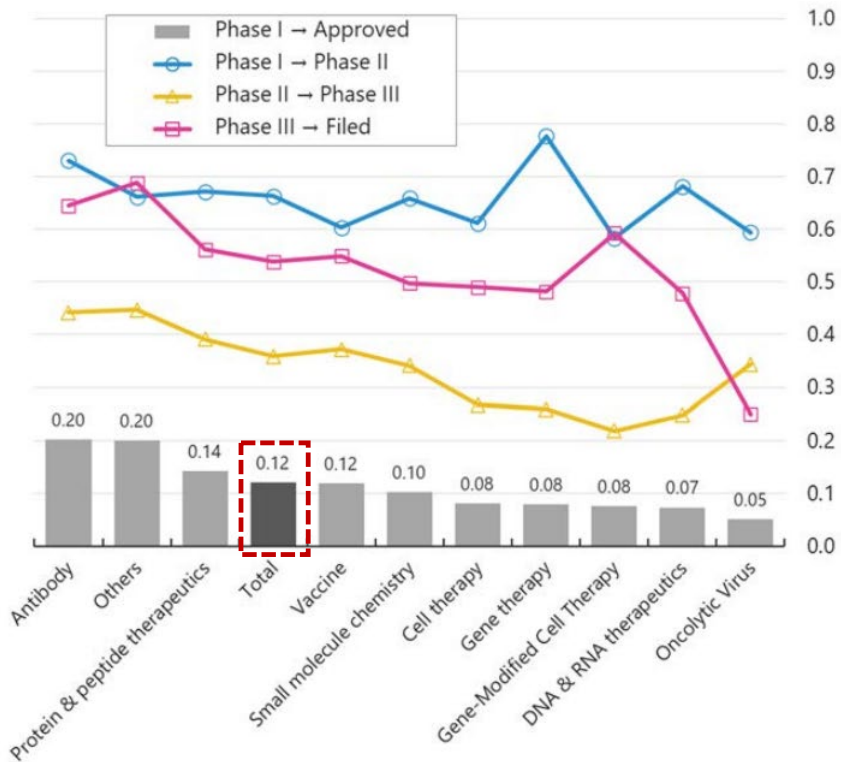


The screenshot shows the Docuvera website. At the top, there is a navigation menu with the following items: "Home", "Product", "Solutions", "Services", "Resources", and "Contact". The main heading is "Author, review and update once - reuse across multiple documents". Below this, there is a sub-heading "CONTENT AUTHORING FOR LIFE SCIENCES" and a description: "Structured component authoring designed specifically for Life Sciences. Improves the efficiency of document creation, review and revisions, while reducing the time spent on every project." The bottom part of the screenshot shows the DDI website with a navigation menu: "Industry", "Products", "Customer Success", "Resources", "About", and "Schedule a Demo". Below this, there is a sub-heading "Structured Content Management (SCM)".

Probability of Success: by Modality

(Office of Pharmaceutical Industry Research, JPMA 2024)

図 1-26 モダリティ別の成功確率



Overall: 12%
From P1 to Approval

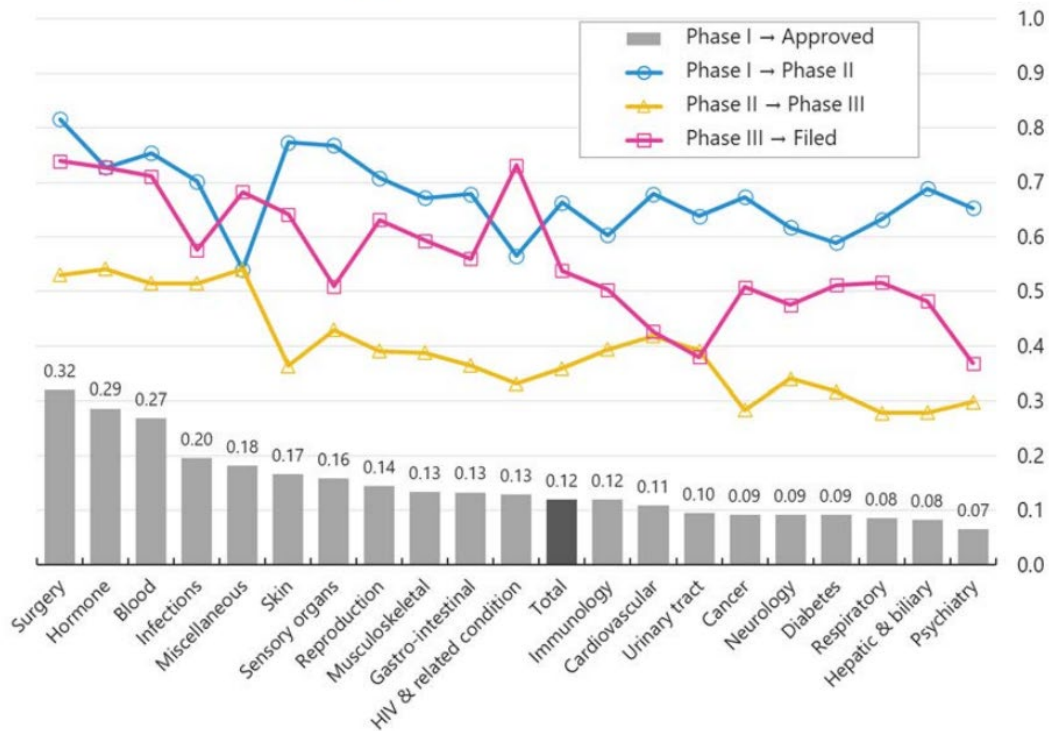
Target trials
 P1: Initiate after 2010
 P2: Initiate after 2005
 P3: Initiate after 2000
 File: Submit after 2000

https://www.jpma.or.jp/opir/research/rs_082/article_082.html



Probability of Success by Disease Area (Office of Pharmaceutical Industry Research, JPMA 2024)

図 1-28 疾患領域別の成功確率



Target trials

P1: Initiate after 2010

P2: Initiate after 2005

P3: Initiate after 2000

File: Submit after 2000

https://www.jpma.or.jp/opir/research/rs_082/article_082.html

Factors associated with clinical trials that fail and opportunities for improving the likelihood of success: A review (Fogel 2018)

失敗した臨床試験に関連する要因と成功可能性を高める機会: レビュー

Table 1
A list of factors associated with problems or challenges when preparing for or executing a clinical trial, along with the opportunities for artificial intelligence to help alleviate these issues. Abbreviation: NLP = natural language processing.

Factor	Opportunity	Role for Artificial Intelligence
Poor study design	More complete literature review	NLP of available literature, finding similar trials, trials addressing similar issues, or trials addressing different issues utilizing similar techniques, summarized for the study designer showing endpoints/measures used in other similar studies published trials to determine suitability of eligibility criteria and any assessments. summarizing statistical methods and associating these methods with as with neural networks, to predict patient drop-out rates and better estimate sample size to avoid becoming underpowered. Agent-based modeling to simulate trial before execution. Use of NLP to mine previously published trials to determine sample sizes used in successful trials.
Ineffective sites selection		ner with pertinent information to consider. events schedule against text, as well as assess trade-offs site history, staff ion, expected patient burden, and financial impact. Potential use of fuzzy logic to provide linguistic measurement descriptions.
Poor recruitment	Improved use of funds	Optimizing communication/advertising to maximize cost effectiveness. Targeting communication to meet patient profile, including sentiment analysis. lications to identify suitable criteria, and also criteria associated with other trial ation, prompting investigators and patients when appropriate trials are available ments.
Patient burden/safety	Minimize travel and wait times	Learning to profile patients based on prior data on who is more likely to complete a trial, reducing drop-outs. Adaptive patient scheduling, also potentially turn-by-turn driving instructions, using evolutionary algorithms. Incorporate patient profiles to tailor site assignment/schedules to patient constraints if possible. identify opportunities to minimize impacts. ent medications for contraindications, protocol violations.
Poor trial execution	Automating reporting of events	Automated prompting of events for patients and staff, reporting requirements, notes missed events, ng, including protocol deviations and adverse events. ersion, skeletal form generation for narratives, table creation based to investigator/study coordinator monitoring study progress, patient tions if needed.
Overall	Factor analysis to improve trade-offs based on budget and other constraints	multicriteria decision making based on Pareto analysis or single aggregated evaluation function (Valuated State Space) to quantify and illuminate trade-offs.

Poor Study Design

Ineffective sites selection

Poor recruitment

Patient burden/safety

Poor trial execution

- ✓ Literature from the past 30 years was reviewed.
 - ✓ Specific instances where artificial intelligence can help improve clinical trials are identified.
- 過去30年間の文献を検討
AIが臨床試験の改善に役立つ具体的事例を示す

Table 1

A list of factors associated with problems or challenges when preparing for or executing a clinical trial, along with the opportunities for artificial intelligence to help alleviate these issues. Abbreviation: NLP = natural language processing.

Factor	Opportunity	Role for Artificial Intelligence
Poor study design	More complete literature review	NLP of available literature, finding similar trials, trials addressing similar issues, or trials addressing different issues utilizing similar techniques, summarized for the study designer
	Appropriate endpoints	NLP of available literature, showing endpoints/measures used in other similar studies
	Inappropriate eligibility criteria	NLP assessment of similar published trials to determine suitability of eligibility criteria and any potentially important omissions.
	Appropriate statistical analysis	NLP of available literature, summarizing statistical methods and associating these methods with successful or failed outcomes.
	Determination of appropriate sample size	Nonlinear modeling, such as with neural networks, to predict patient drop-out rates and better estimate sample size to avoid becoming underpowered. Agent-based modeling to simulate trial before execution. Use of NLP to mine previously published trials to determine sample sizes used in successful trials
Reducing likelihood of amendments	NLP and knowledge-based processing to present designer with pertinent information to consider.	
Inconsistencies in protocol	NLP (including table-based format) to check time and events schedule against text, as well as summary of changes for any amendments.	

Poor Study Design

Accumulated database of protocols and related information enables NLP to conduct exhaustive / efficient reviews and propose appropriate study design

蓄積されたプロトコルおよび関連情報のデータベースがあれば、NLPによる網羅的・効率的なレビューや、適切な試験デザイン案の提案が可能

Table 1

A list of factors associated with problems or challenges when preparing for or executing a clinical trial, along with the opportunities for artificial intelligence to help alleviate these issues. Abbreviation: NLP = natural language processing.

Factor	Opportunity	Role for Artificial Intelligence
Poor trial execution	Automating reporting of events	Automated prompting of events for patients and staff, reporting requirements, notes missed events, prompts for required reporting, including protocol deviations and adverse events.
	Preparing data and reporting for write-up	Automatic brand/generic conversion, skeletal form generation for narratives, table creation based on specified cut-offs.
	Lack of general awareness	Situation awareness provided to investigator/study coordinator monitoring study progress, patient progress, indicating interventions if needed.

Poor trial execution

Improving the quality of studies through the automation of clinical trial-related tasks

治験関連業務の自動化などを通して、試験の品質向上

Pilot projects using LLM

Writing the Clinical Study Protocol

KarXT Emergent-1

<https://www.clinicaltrials.gov/ct2/show/NCT03697252>

PROCEDURE	SCREENING PHASE	TREATMENT PHASE	TREATMENT PHASE	TREATMENT PHASE	TREATMENT PHASE	TREATMENT PHASE	TREATMENT PHASE	TREATMENT PHASE	TREATMENT PHASE
VISIT	1 (Day -7 TO -1)(Day 1)	3 (Day 3 ± 1 day)	4 (Day 7 ± 2 days)	5 (Day 8 ± 2 days)	6 (Day 14 ± 2 days)	7 (Day 21 ± 2 days)	8 (Day 28 ± 2 days)	9(ET (Day 35 ± 2 days)	Unscheduled Visits(b)
WEEKS PAST RANDOMIZATION	NA	0		1		2	3	4	5
Written informed consent	X								
Collect demographic information (date of birth, gender, race)	X								
Pregnancy test (females of childbearing potential only) (c)	X(c)	X(c)							X(c)
Urine drugs of abuse test and alcohol testing(d)	X								
Review of inclusion/exclusion criteria	X	X							
Subject eligibility verification process	X								
Medical, psychiatric, and medication history	X								
Complete physical examinations	Xe								X(e)
Spontaneous AEs and medical status(f)		X	X	X	X	X	X	X	X
Review of concomitant medications	X	X	X	X	X	X	X	X	X

PROMPT: Write the Study Procedures section of the study protocol based on the table of assessment

Chatbot for Protocol

Chat with protocol

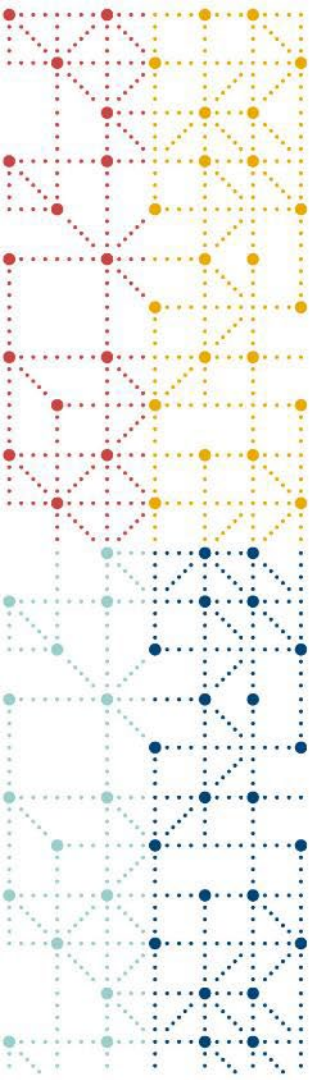
Let's upload your protocol

Upload Protocol

Select file 100324977protocol.docx (179.13 KB)

embedding model for context max token for context embedding

Site monitor and/or site personnel can ask questions about the study at anytime

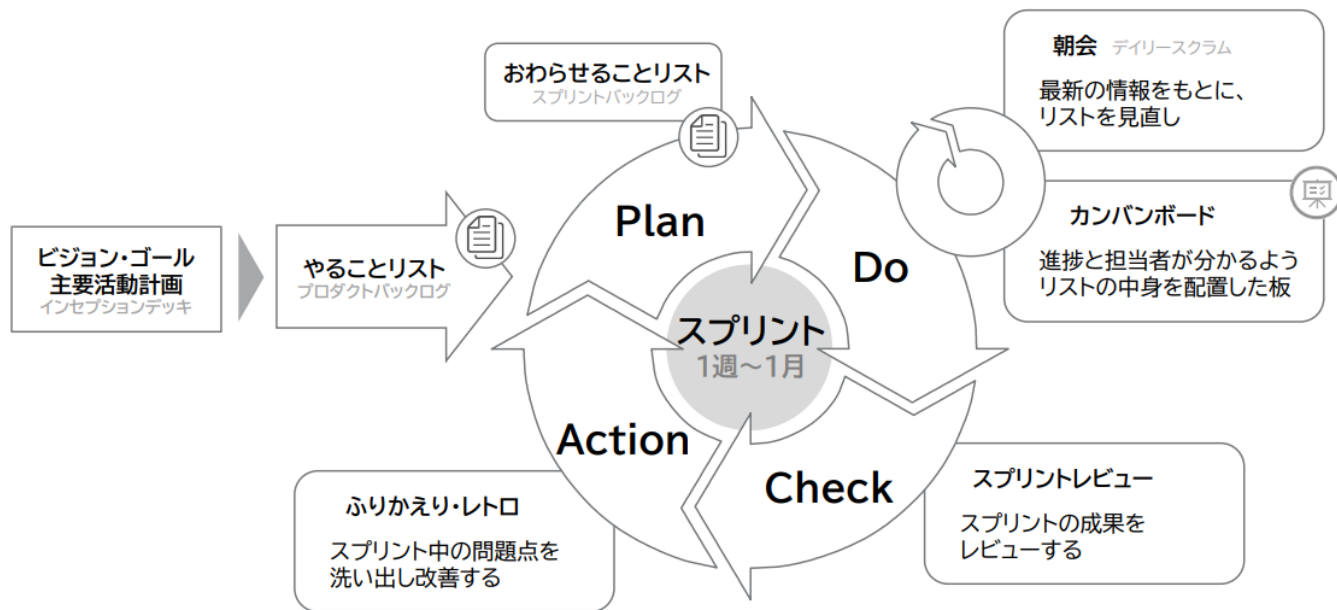


3. Agile Mindset for Digital Transformation

DXのためのアジャイルマインド

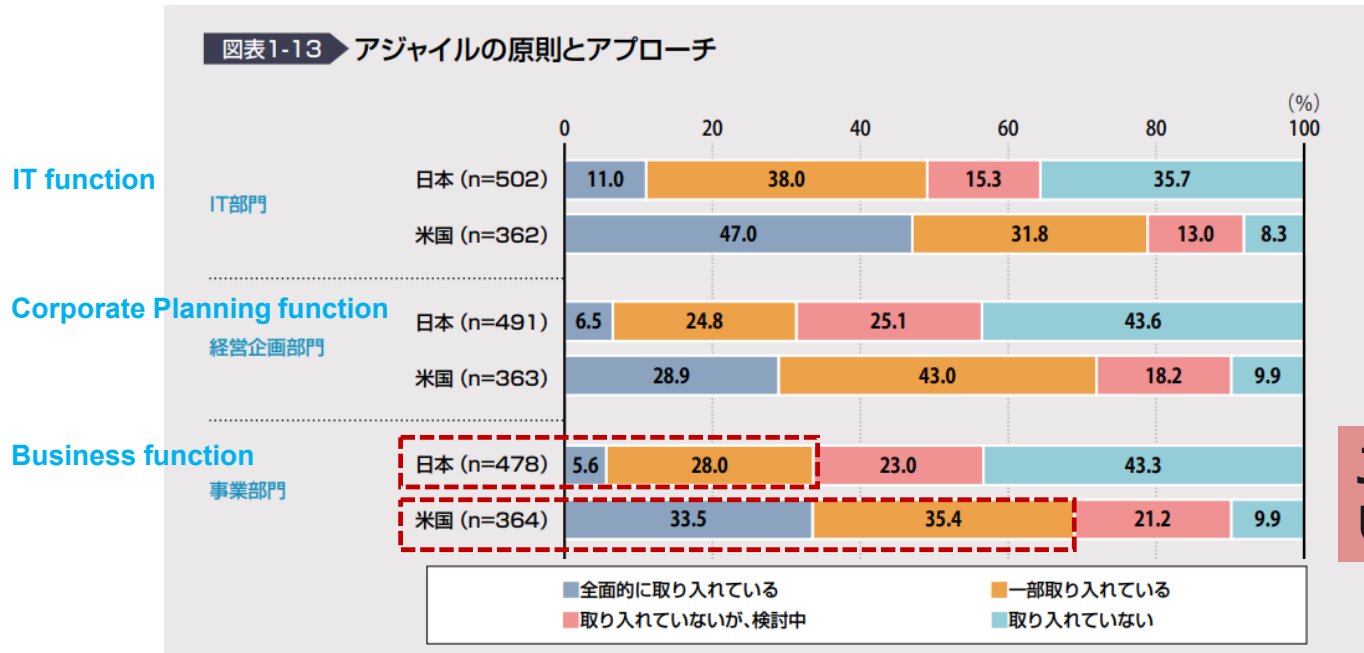
Agile: Methodology for high-speed PDCA cycles

PDCAを高速に回すための手法であるアジャイル



Agile: More adopted in office work in the U.S.

米国ではオフィスワークでもアジャイルアプローチが取り入れられている



Japan: 34%
US: 69%

DX白書2023

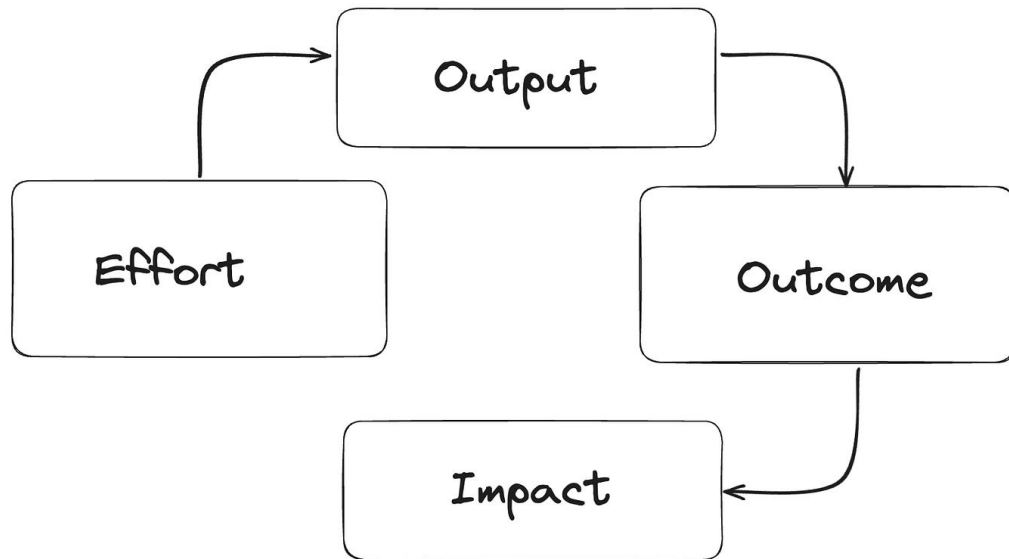


Key to promote DX

DX推進のコツ

アウトカムを重視する

OUTCOME



Kent Beck / Software Design: Tidy First? and pragmaticengineer.com

参考 | <https://newsletter.pragmaticengineer.com/p/measuring-developer-productivity>
The Pragmatic Engineer, The effort/output/outcome/impact mental model, 2024/02/09

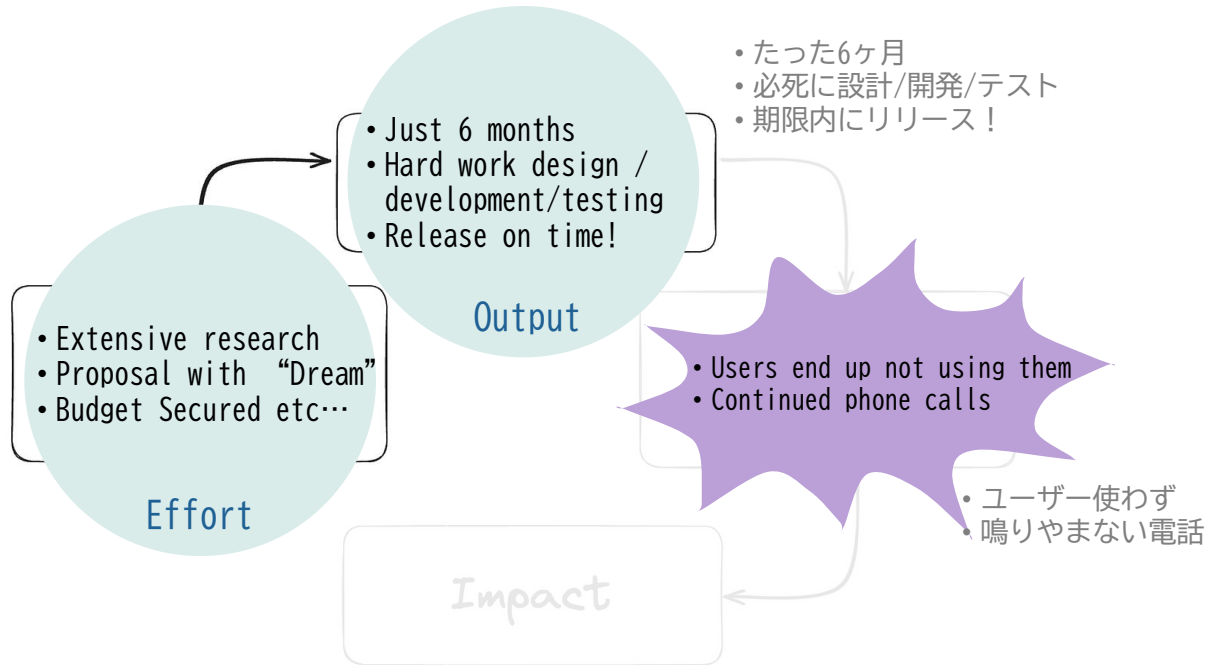
Key to promote DX

DX推進のコツ

Failure example: Stop at Output
失敗例：Outputで止まってしまふ

アウトカムを重視する
OUTCOME

- 徹底した調査
- 夢あふれる企画書
- 予算確保 etc...



Kent Beck / Software Design: Tidy First? and pragmaticengineer.com .COM

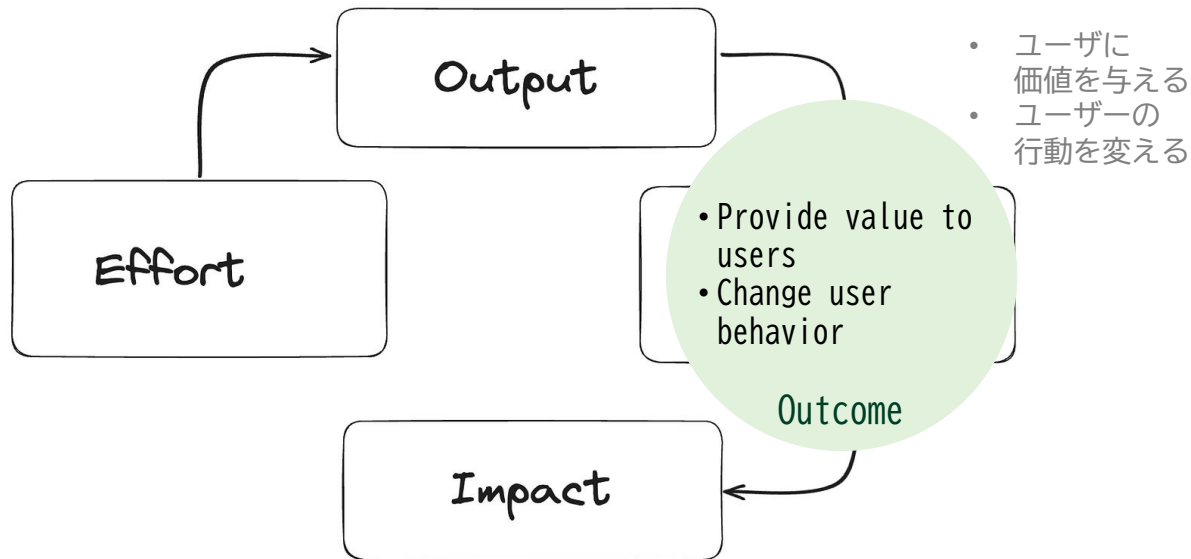
参考 | <https://newsletter.pragmaticengineer.com/p/measuring-developer-productivity>
The Pragmatic Engineer, The effort/output/outcome/impact mental model, 2024/02/09

Key to promote DX

DX推進のコツ

Recommendation: Place the Goal in Outcome
推奨：ゴールはOutcomeに置く

アウトカムを重視する
OUTCOME



Kent Beck / Software Design: Tidy First? and pragmaticengineer.com .COM

参考 | <https://newsletter.pragmaticengineer.com/p/measuring-developer-productivity>
The Pragmatic Engineer, The effort/output/outcome/impact mental model, 2024/02/09

Key to promote DX

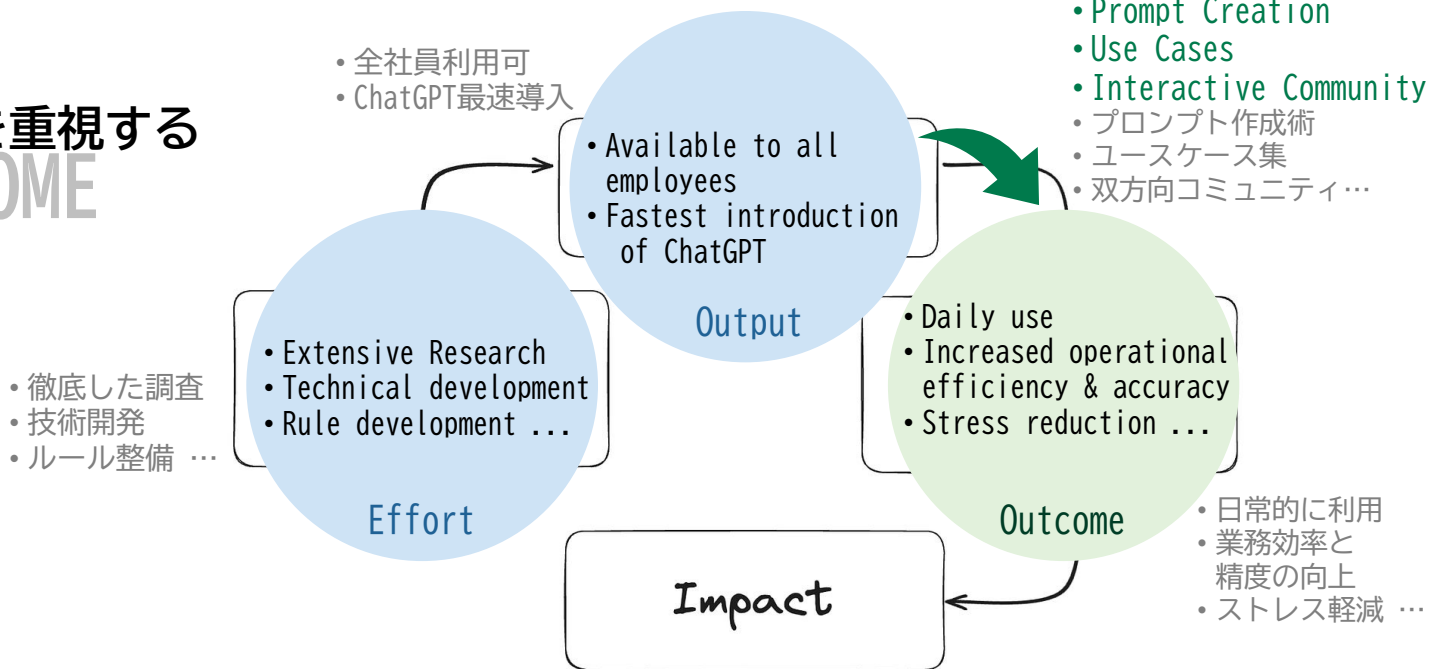
DX推進のコツ

Recommendation: Place the Goal in Outcome

推奨：ゴールはOutcomeに置く

アウトカムを重視する

OUTCOME



Kent Beck / Software Design: Tidy First? and pragmaticengineer.com .COM

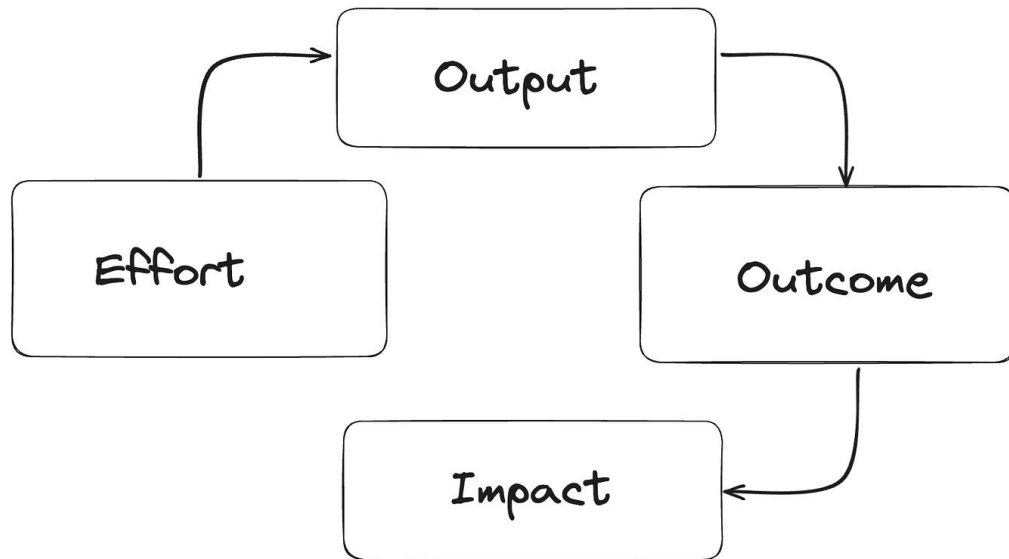
参考 | <https://newsletter.pragmaticengineer.com/p/measuring-developer-productivity>
The Pragmatic Engineer, The effort/output/outcome/impact mental model, 2024/02/09

Key to promote DX

DX推進のコツ

アウトカムを重視する

OUTCOME

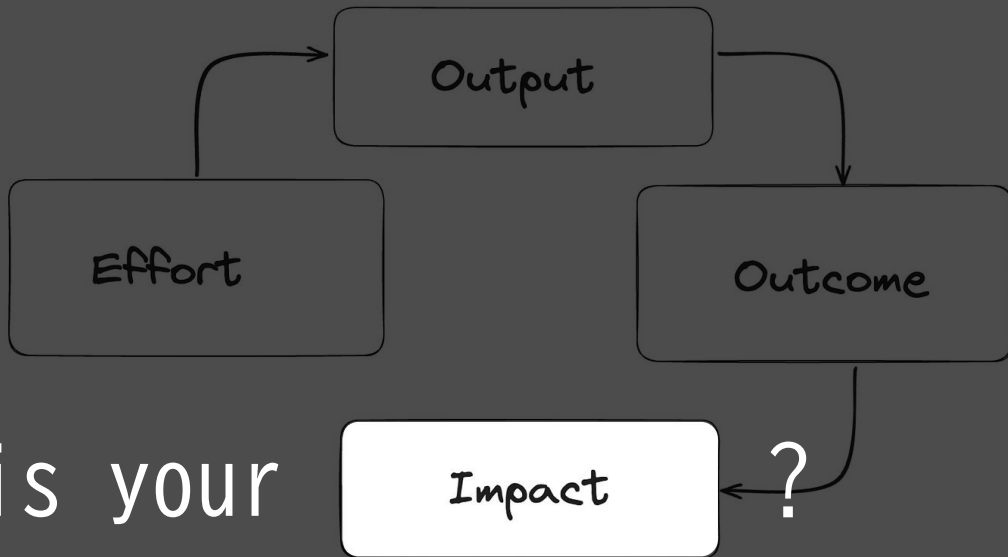


Kent Beck / Software Design: Tidy First? and pragmaticengineer.com

参考 | <https://newsletter.pragmaticengineer.com/p/measuring-developer-productivity>
The Pragmatic Engineer, The effort/output/outcome/impact mental model, 2024/02/09

Question to you

アウトカムを重視する
OUTCOME



What is your

Kent Beck / Software Design: Tidy First? and pragmaticengineer.com

参考 | <https://newsletter.pragmaticengineer.com/p/measuring-developer-productivity>
The Pragmatic Engineer, The effort/output/outcome/impact mental model, 2024/02/09

Acknowledgments

● ICH M11: EWG members

- ✓ Rapporteur: Ron Fitzmartin, Regulatory Chair: Noemie Manent
- ✓ PMDA: Hiroshi Sakaguchi, Toshinori Takagi
- ✓ JPMA: Hiroshi Matsuzawa, Manabu Inoue, Keiko Tsumori, Azusa Tsukida

● JPMA: Drug Evaluation Committee, Data Science expert committee

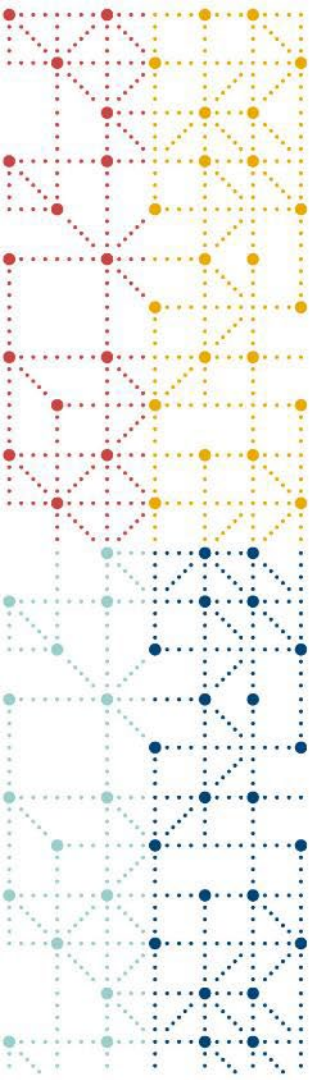
- ✓ Chair: Hideharu Yamamoto
- ✓ ICH M11 & Medical Writing TF members

● MSD

- ✓ Yuka Ito

● Sumitomo Pharma

- ✓ Agile Scrum Master: Hidekazu Sugawara



Thank You!

cdisc