

**THOMAS JEFFERSON UNIVERSITY**  
***Kimmel Cancer Center***

***PREOPERATIVE ENDOSCOPIC BILIARY DRAINAGE WITH SELF EXPANDING METAL STENTS (SEMS) VS. DIRECT SURGICAL RESECTION FOR PATIENTS WITH SEVERE OBSTRUCTIVE JAUNDICE***

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## Table of Contents

Study Summary.....	5
1    Introduction .....	6
1.1    Specific Aims and Hypothesis.....	6
1.2    Background.....	6
1.3    Study Therapy .....	6
1.4    Preclinical Data .....	6
1.5    Clinical Data to Date .....	6
1.6    Dose Rationale and Risk/Benefits .....	7
2    Study Objectives .....	7
2.1    Primary Objective.....	6
2.2    Secondary Objective(s).....	6
3    Study Design .....	7
3.1    General Design .....	7
3.2    Primary Study Endpoints.....	7
3.3    Secondary Study Endpoints.....	7
3.4    Primary Safety Endpoints.....	8
4    Subject Selection and Withdrawal .....	8
4.1    Inclusion Criteria.....	8
4.2    Exclusion Criteria.....	8
4.3    Gender/Minority/Pediatric Inclusion for Research.....	8
4.4    Subject Recruitment and Screening.....	8
4.5    Early Withdrawal of Subjects.....	9
4.5.1    When and How to Withdraw Subjects .....	9
4.5.2    Data Collection and Follow-up for Withdrawn Subjects .....	9
5    Study Drug/Therapy .....	9
5.1    Description .....	9
5.2    Treatment Regimen .....	9
5.3    Risks .....	9
5.4    Method for Assigning Subjects to Treatment Groups .....	9
5.6    Subject Compliance Monitoring.....	10
5.7    Prior and Concomitant Therapy .....	10
5.9    Blinding of Study Drug .....	11
6    Study Procedures.....	12
6.1    Study Visit Schedule .....	12
7    Statistical Plan.....	12
7.1    Sample Size Determination .....	12
7.2    Statistical Methods .....	12
7.3    Subject Population(s) for Analysis .....	12
8    Safety and Adverse Events.....	13
8.1    Definitions .....	13
8.2    Recording of Adverse Events .....	15
8.3    Unblinding Procedures .....	15
8.4    Stopping Rules.....	15

8.5	Data and Safety Monitoring Plan .....	16
8.5.1	Medical Monitoring and AE/SAE Reporting.....	17
8.5.2	Data and Safety Monitoring Committee .....	19
9	Data Handling and Record Keeping.....	19
9.1	Confidentiality.....	19
9.2	Source Documents.....	20
9.3	Case Report Forms .....	20
9.4	Records Retention .....	20
10	Study Monitoring, Auditing, and Inspecting.....	21
10.1	Study Monitoring Plan.....	21
10.2	Auditing and Inspecting.....	23
10.2.1	Independent External and Internal Audits.....	24
11	Ethical Considerations.....	25
12	Study Finances .....	26
12.1	Funding Source.....	26
12.2	Conflict of Interest.....	26
12.3	Subject Stipends or Payments.....	26
13	Publication Plan.....	26
14	References .....	26
15	APPENDices .....	27

## **List of Abbreviations**

SEMS; Self Expanding Metal Stents

ERCP; Endoscopic Retrograde Cholangiopancreatogram

CBC; Complete Blood Count

CMP; Comprehensive Metabolic Panel

INR; International Normalized Ratio

1 Study Summary

Title	Preoperative Endoscopic Biliary Drainage with Self Expanding Metal Stents (SEMS) vs. Direct Surgical Resection for Patients with Severe Obstructive Jaundice
Short Title	Pre-surgery biliary stent placement vs. direct surgery in patient with obstructive jaundice
Protocol Number	
Phase	N/A
Methodology/Study Design	Randomized control trial
Study Duration	24 months
Study Center(s)	Thomas Jefferson University
Objectives	Investigate the advantage of using biliary SEMS in patients with severe jaundice prior to surgical resection
Number of Subjects	100
Diagnosis and Main Inclusion Criteria	Patients with periampullary cancer with profound jaundice
Study Therapy, Dose, Route, Regimen	Pre-operative SEMS placement vs direct surgical resection
Duration of administration and follow-up	Patient outcome data will be monitored at 30 days and 90 days post resection surgery.
Reference therapy	Direct surgery without stent placement
Statistical Methodology	This is a superiority trial of early surgery without biliary stenting, as compared with preoperative biliary drainage in patients with severe obstructive jaundice
Schema	<pre> graph LR     A[100 patients] --&gt; B[50 patients with preoperative stent placement]     A --&gt; C[50 patients without preoperative stent placement]     B --&gt; D[Grade III or higher complication]     B --&gt; E[No complications]     C --&gt; F[Grade III or higher complication]     C --&gt; G[No complications]   </pre>

3        **1.0 INTRODUCTION**

4        Pancreatic cancer is the second most common digestive cancer and fourth leading cause of cancer  
5        death in the United States for both men and women. Pancreatic tumors arising in the peri-  
6        ampullary region present with biliary obstruction in 64-77% of cases. Preoperative biliary  
7        decompression has been advocated in an attempt to reduce postoperative complications following  
8        attempted curative-intent surgery.

9  
10      This document is a protocol for a human research study. This study is to be conducted according  
11      to US and international standards of Good Clinical Practice (FDA Title 21 part 312 and  
12      International Conference on Harmonization guidelines), applicable government regulations and  
13      Institutional research policies and procedures.

14        **1.1 Specific Aims and Hypothesis**

15        The primary aim of this study is to compare the 30 and 90-day overall/cumulative grade III or  
16        higher complication rates between patients with severe obstructive jaundice undergoing  
17        preoperative endoscopic biliary drainage with SEMS and patients undergoing direct surgical  
18        resection. In this study, **One arm undergoes preoperative biliary drainage followed by surgery and**  
19        **the other arm undergoes surgical resection** without prior biliary drainage. Secondary aims will be  
20        to compare surgical outcomes including mortality, intra-operative parameters, hospital length of  
21        stay, ICU length of stay, readmission rate and time to commencement of adjuvant treatment.

22        **1.2 Background and Rationale**

23        Despite the fact that endoscopic and percutaneous placement of biliary stents is technically  
24        successful in 90-95% of cases, routine preoperative biliary drainage for pancreatic cancer remains  
25        controversial.[4, 5] Pooled data from retrospective studies published over the past several years  
26        have shown similar rates of 30-day mortality after pancreaticoduodenectomy in those who have  
27        undergone biliary decompression as compared to those who have not. A few studies have  
28        suggested that routine preoperative drainage in patients undergoing surgery for cancer of the  
29        pancreatic head may increase overall complications, likely due to complication related to the  
30        endoscopy itself (i.e. pancreatitis, bleeding, perforation) and complications related to stent  
31        failure.[6] In the largest, multicenter, randomized trial to date, patients were randomly assigned  
32        to undergo either endoscopic preoperative biliary drainage for 4 to 6 weeks, followed by surgery,  
33        or surgery alone after diagnosis. In this study, endoscopic preoperative biliary drainage did not  
34        have a beneficial effect on the surgical outcome but rather was associated with an increase in  
35        serious complications.[7]

36  
37        On the other hand, outcome measures have not been standardized and the lack of complete data  
38        on surgical complications following preoperative drainage make direct comparisons difficult and  
39        potentially biased. Many of the prior studies used plastic stents for preoperative decompression,  
40        which when compared to self-expanding metal stents (SEMS) result in greater rates of re-  
41        intervention and cholangitis. A recent meta-analysis of 1989 patients showed that SEMS have  
42        higher stent insertion success, lower risk of stent occlusion, lower re-intervention rate, fewer  
43        therapeutic failures, and fewer episodes of cholangitis compared to plastic stents making them the  
44        optimal choice for biliary decompression.[8] Also a recent randomized controlled trial confirmed  
45        that SEMS are superior to plastic stents with regard to functional stent time and showed that the  
46        total health care cost is similar for placing SEMS or plastic stents even in patients with survival  
47        less than 3 months.[9] Thus, this study will provide unique perspective on the potential  
48        advantages of biliary decompression using SEMS. Additionally, prior studies have excluded  
49        severely jaundiced patients (serum bilirubin > 14.6), a population that may have derived the

50 greatest benefit from preoperative drainage, since these patients are more likely to have impaired  
51 liver function. In fact, patients with malignant obstruction who present with severe jaundice  
52 ( $>10\text{mg/dL}$ ) are likely at higher risk for poor outcome following surgery.[10] These patients may  
53 also benefit from preoperative drainage to alleviate pruritus and correct coagulation  
54 disturbances.[11] Thus, although preoperative biliary drainage may not be routinely  
55 recommended for all patients with malignant biliary obstruction, drainage may be potentially  
56 advantageous for those patients with severe jaundice using a SEMS.

57 **1.3 Study Therapy**

58 Both preoperative SEMS placement and direct surgical resection are considered acceptable  
59 standard of care in this patient population.

60  
61 SEMS (Wallflex, Boston Scientific) will be used. The WallFlex Biliary Stent System is FDA-  
62 cleared in the US, and is indicated for use in the palliative treatment of biliary strictures produced  
63 by malignant neoplasms. Also, the WallFlex Biliary RX Stent is 510(k) cleared for the treatment  
64 of biliary strictures produced by malignant neoplasms and relief of malignant biliary  
65 obstruction prior to surgery. This represents the first biliary metal stent with labeling to support  
66 pre-operative drainage in the US.

67 **1.4 Preclinical Data**

68 Please see clinical data below

69 **1.5 Clinical Data to Date**

70 A recent meta-analysis of 1989 patients showed that SEMS have higher stent insertion success,  
71 lower risk of stent occlusion, lower re-intervention rate, fewer therapeutic failures, and fewer  
72 episodes of cholangitis compared to plastic stents making them the optimal choice for biliary  
73 decompression.[8] Also a recent randomized controlled trial confirmed that SEMS are superior to  
74 plastic stents with regard to functional stent time and showed that the total health care cost is  
75 similar for placing SEMS or plastic stents even in patients with survival less than 3 months

76 **1.6 Dose Rationale and Risk/Benefits**

77 The study doesn't involve drug administration.

78 **2.0 STUDY OBJECTIVES**

79 **2.1 Primary Objective:**

80 The primary aim of this study is to compare the 30 and 90-day overall complication rates between  
81 patients with severe obstructive jaundice undergoing preoperative endoscopic biliary drainage  
82 with SEMS and patients undergoing direct surgical resection.

83 **2.2 Secondary Objective:**

84 Secondary aims will be to compare surgical outcomes including hospital length of stay, ICU  
85 length of stay, readmission rate, disposition from hospital, emergency room visits, urgent care  
86 center visits and time to commencement of adjuvant treatment.

87 **3.0 STUDY DESIGN**

88 **3.1 General Design**

89 This is a Randomized controlled trial.

92 ERCP will be performed on those who are randomized to the intervention group with 24 hours of  
93 randomization. The patient will be followed at 30 days and 90 days post-operatively.

94 **3.2 Primary Study Endpoints**

95 30 and 90 day- complication rates between patients with severe obstructive jaundice undergoing  
96 preoperative endoscopic biliary drainage with SEMS and patients undergoing direct surgical  
97 resection

98 **3.3 Secondary Study Endpoints**

99 Secondary aims include the total number of complications, intraoperative estimated blood loss,  
100 number of required fluid boluses, postoperative hospital LOS, readmission rate, disposition from  
101 hospital, time to commencement of adjuvant treatment, emergency room visits, urgent care center  
102 visits, and perioperative mortality. Complications will include pancreatic fistula, delayed gastric  
103 emptying, intra-abdominal abscess, cardiac complications, respiratory complications, deep vein  
104 thrombosis, pulmonary embolism, urinary tract infection, wound infection, acute renal failure,  
105 hemorrhage, hepaticojjunostomy leak, and duodenojjunostomy leak. Pancreatic fistula was  
106 defined and graded according to the International Study Group of Pancreatic Fistula criteria.  
107 Delayed gastric emptying was defined and graded according to the International Study Group of  
108 Pancreatic Surgery. Wound infections and urinary tract infection were defined according to the  
109 Centers for Disease Control and Prevention guidelines. Cardiac complications were defined  
110 according to the American College of Cardiology and renal complications were defined by the  
111 Acute Dialysis Quality Initiative.

112 **3.4 Primary Safety Endpoints**

113 Both SEMS placement and direct surgical resection are considered acceptable standard of care  
114 practices.

115 **4.0 SUBJECT SELECTION AND WITHDRAWAL**

116 **4.1 Inclusion Criteria**

117 -Adult patients age >18 regardless of gender or ethnicity  
118 -Patients with peri-ampullary pancreatic cancer.  
119 -Patients with serum bilirubin greater than 10mg/dL  
120 -Adequate birth control

121 **4.2 Exclusion Criteria**

122 -Patients with evidence of distant metastasis on CT or MRI  
123 -Patients anticipated to require vascular reconstruction  
124 -Patients with cholangitis  
125 -Patients who previously underwent biliary decompression for cholangitis by ERCP or PTC  
126 -Patients with low performance score (Karnofsky performance status scale < 50)  
127 -Patients with known preexisting liver disease with associated elevated bilirubin  
128 -Patients who are pregnant or actively breast feeding.

129 **4.3 Gender/Minority/Pediatric Inclusion for Research**

130 Any patient can be included if older than 18 years of age irrespective of gender, color, or  
131 ethnicity.

133 4.4 Subject Recruitment and Screening

134 One Hundred patients older than 18 years with periampullary cancer presenting with jaundice and  
135 total bilirubin greater than 10mg/dL will be included in the study.

136 Patients will be recruited from clinic (gastroenterology and pancreaticobiliary surgery) or when  
137 admitted to the hospital for workup and/or management and will be consented at that time.

138

139 4.5 Early Withdrawal of Subjects

140 **4.5.1 When and How to Withdraw Subjects**

141 Patients can withdraw from the study at any time. Stent placement is the standard of care and thus  
142 subjects who elect to withdraw from the study will continue to have the biliary stent in place and  
143 be followed regularly similar to patients that are enrolled in the study.

144 **4.5.2 Data Collection and Follow-up for Withdrawn Subjects**

145 Subjects who elect to withdraw from the study will continue to be followed on a regular basis.  
146 Data that is important to the integrity of the final study analysis and the safety profile of the  
147 SEMS will be collected after obtaining approval of the subjects.

148

149 **5.0 STUDY DRUG/THERAPY**

150 5.1 Description

151 The stents to be used in this study are FDA approved WallFlex Biliary RX Stents (Boston  
152 Scientific Corporation, Natick, MA, USA) which are available in diameters of 8 or 10 mm and  
153 lengths of 40, 60, and 80 mm.

154 5.2 Treatment Regimen

155 Stent to be placed pre-operatively in the intervention group to be removed during surgery.

156 5.3 Risks

• Pain	• Infection	• Tumor overgrowth around ends of stent
• Bleeding	• Inflammation	• Mucosal hyperplasia
• Fever	• Recurrent obstructive jaundice 26% (likely)	• Cholangitis
• Nausea	• Stent occlusion	• Cholecystitis 10% (likely)
• Vomiting	• Tumor ingrowth through the stent	• Pancreatitis 6% (possible)
• Bile duct ulceration	• Perforation of duodenum or bile duct	• Stent migration 8% (possible)
• Perforation of the gall bladder due to the stent covering the cystic duct	• Stent misplacement	

157

158

159 Once again, placement of SEMS is the standard of care for patient with profound jaundice despite  
160 the lack of evidence to support this practice.

161 5.4 Method for Assigning Subjects to Treatment Groups  
162 A randomization schedule will be created by the study statistician using the method of random  
163 permuted blocks. Randomization assignments will be loaded into a REDCap database before  
164 study enrollment begins. Randomization assignments will be accessed through the REDCap  
165 randomization facility.

166 5.5 Preparation and Administration of Study Drug/Therapy  
167 The intervention group will receive a WallFlex Biliary RX Stents (Boston Scientific Corporation,  
168 Natick, MA, USA)

169 5.6 Subject Compliance Monitoring  
170 The stent will placed by ERCP and won't be removed before surgery unless indicated. Follow up  
171 phone calls to ascertain secondary endpoints will be made at 30 and 90 days.

172 5.7 Prior and Concomitant Therapy  
173 Subject in the study are to continue any medications that they are on. Those who are randomized  
174 to the intervention group may be asked to hold antiplatelet/anticoagulation agents prior to the  
175 ERCP in coordination with their prescribing doctor.

176 5.8 Blinding of Study Drug  
177 Unblinded study

178 **6.0 STUDY PROCEDURES**

179

180 **6.1 Study Visit Schedule**

181 **Screening:**  
182 Patients will be screened in clinic or if admitted as inpatients. Patient must satisfy the inclusion  
183 criteria listed above. Patient must carry a diagnosis of per-ampullary cancer. Basic labs will be  
184 withdrawn including CBC, CMP and INR.

185

186 **Randomization**  
187 **Peri-operative:** The patient will be admitted and labs will obtained including CBC, CMP and  
188 INR prior to surgery.

189

190 **Post-operative:**  
191 Visit 1: This will be scheduled 3-4 weeks after hospital discharge. Labs and imaging may be  
192 ordered by the surgeon if needed.

193 Follow-up  
194 Patients will be followed up to 90 days after the surgery. A phone call will be placed to the  
195 patient by research staff to ascertain secondary endpoints. Jefferson EMR will be accessed  
196 to ascertain primary endpoint data.

197

198 **7.0 STATISTICAL PLAN**

199 7.1 Sample Size Determination  
200 Based on previous data, we assumed an overall grade III or higher complication rate of  
201 50% in the control group. Although we are unsure of the expected rate in the pre-operative  
202 biliary stenting group, a 30% or greater reduction in the grade III or higher complication

would be meaningful. The sample size will be 100 subjects (50 per arm). We calculated power under various alternatives for the biliary stenting group complication rate using a two-group large-sample normal approximation test of proportions, with a one-sided significance level of 0.05, to test the null hypothesis that the grade III or higher complication rate in surgery with biliary stenting is greater than or equal to the control rate (50%). We have 84% power to detect a reduction if the true rate with biliary stenting is 25%, 66% power if the true rate is 30%, and 44% power if the true rate is 35%.

## 7.2 Statistical Methods

Baseline characteristics will be summarized by randomization arm using means, standard deviations, and ranges for continuous variables and counts and frequencies for categorical variables.

Rates of grade III or higher complication rates will be estimated separately at 30 and 90 days. The risk difference will be calculated (stent minus control) with a one-sided 95% confidence interval. If the upper bound of the confidence interval is less than 0 at both times, surgery with biliary stenting will be considered effective at reducing the rate of grade III or higher complications.

Group comparisons with respect to continuous outcomes will be performed using two-sample t-tests or Wilcoxon rank sum tests. Comparisons for categorical outcomes will be performed using chi-square tests or Fisher's exact test. Comparisons for count outcomes will use Poisson regression. Kaplan-Meier analysis will be used to estimate the distribution of time-to-event outcomes. Groups will be compared using the log rank test.

## 7.3 Subject Population(s) for Analysis

All randomized patients will be included in the analysis as randomized. A per-protocol analysis will be performed if there are any patients who do not receive the assigned surgical technique.

## 8.0 SAFETY AND ADVERSE EVENTS

### 8.1 Definitions

#### Adverse Event

An **adverse event** (AE) is any symptom, sign, illness or experience that develops or worsens in severity during the course of the study. Intercurrent illnesses or injuries should be regarded as adverse events. Abnormal results of diagnostic procedures are considered to be adverse events if the abnormality:

- results in study withdrawal
- is associated with a serious adverse event
- is associated with clinical signs or symptoms
- leads to additional treatment or to further diagnostic tests
- is considered by the investigator to be of clinical significance

#### Serious Adverse Event

Adverse events are classified as serious or non-serious.

A **serious adverse event** is any AE that is:

- fatal

247           • life-threatening  
248           • requires or prolongs hospital stay  
249           • results in persistent or significant disability or incapacity  
250           • a congenital anomaly or birth defect  
251           • an important medical event

252  
253           Important medical events are those that may not be immediately life threatening, but are  
254           clearly of major clinical significance. They may jeopardize the subject, and may require  
255           intervention to prevent one of the other serious outcomes noted above. For example, drug  
256           overdose or abuse, a seizure that did not result in in-patient hospitalization or intensive  
257           treatment of bronchospasm in an emergency department would typically be considered  
258           serious.

259  
260           All adverse events that do not meet any of the criteria for serious should be regarded as  
261           ***non-serious adverse events.***

262           Adverse Event Reporting Period

263           The study period during which adverse events must be reported is normally defined as the  
264           period from the initiation of any study procedures to the end of the study treatment follow-  
265           up. For this study, the study treatment follow-up starts at randomization and ends at 90  
266           days after the surgery.

267           Preexisting Condition

268           A preexisting condition is one that is present at the start of the study. A preexisting  
269           condition should be recorded as an adverse event if the frequency, intensity, or the  
270           character of the condition worsens during the study period.

271           General Physical Examination Findings

272           At screening, any clinically significant abnormality should be recorded as a preexisting  
273           condition. At the end of the study, any new clinically significant findings/abnormalities  
274           that meet the definition of an adverse event must also be recorded and documented as an  
275           adverse event.

276           Post-study Adverse Event

277           All unresolved adverse events should be followed by the investigator until the events are  
278           resolved, the subject is lost to follow-up, or the adverse event is otherwise explained. At  
279           the last scheduled visit, the investigator should instruct each subject to report any  
280           subsequent event(s) that the subject, or the subject's personal physician, believes might  
281           reasonably be related to participation in this study. The investigator should notify the study  
282           sponsor of any death or adverse event occurring at any time after a subject has discontinued  
283           or terminated study participation that may reasonably be related to this study. The sponsor  
284           should also be notified if the investigator should become aware of the development of  
285           cancer or of a congenital anomaly in a subsequently conceived offspring of a subject that  
286           has participated in this study.

287           Abnormal Laboratory Values

288           A clinical laboratory abnormality should be documented as an adverse event if any one of  
289           the following conditions is met:

290           • The laboratory abnormality is not otherwise refuted by a repeat test to confirm the  
291           abnormality  
292           • The abnormality suggests a disease and/or organ toxicity

293           • The abnormality is of a degree that requires active management; e.g. change of  
 294           dose, discontinuation of the drug, more frequent follow-up assessments, further  
 295           diagnostic investigation, etc.

296           Hospitalization, Prolonged Hospitalization or Surgery

297           Any adverse event that results in hospitalization or prolonged hospitalization should be  
 298           documented and reported as a serious adverse event unless specifically instructed otherwise  
 299           in this protocol. Any condition responsible for surgery should be documented as an  
 300           adverse event if the condition meets the criteria for an adverse event.

301           Neither the condition, hospitalization, prolonged hospitalization, nor surgery are reported  
 302           as an adverse event in the following circumstances:

- 304           • Hospitalization or prolonged hospitalization for diagnostic or elective surgical  
 305           procedures for a preexisting condition. Surgery should **not** be reported as an  
 306           outcome of an adverse event if the purpose of the surgery was elective or  
 307           diagnostic and the outcome was uneventful.
- 308           • Hospitalization or prolonged hospitalization required to allow efficacy  
 309           measurement for the study.
- 310           • Hospitalization or prolonged hospitalization for therapy of the target disease of the  
 311           study, unless it is a worsening or increase in frequency of hospital admissions as  
 312           judged by the clinical investigator.

313           8.2 Recording of Adverse Events

314           At each contact with the subject, the investigator must seek information on adverse events by  
 315           specific questioning and, as appropriate, by examination. Information on all adverse events  
 316           should be recorded immediately in the source document, and also in the appropriate adverse event  
 317           module of the case report form (CRF). All clearly related signs, symptoms, and abnormal  
 318           diagnostic procedures results should be recorded in the source document, though should be  
 319           grouped under one diagnosis.

320           All adverse events occurring during the study period must be recorded according to the following:

Adverse event	Start date	SAE* 1. Yes (also complete SAE form) 2. No	Causality 1. Unrelated 2. Possibly Related	Severity 1. Mild 2. Moderate 3. Severe	Expectedness 1. Expected 2. Unexpected	DATE of assessment and INITIALS of delegated clinician	Outcome 1. Resolved 2. Ongoing	Date Resolved	AE Recorded by (initials)

324  
325  
326 The clinical course of each event should be followed until resolution, stabilization, or until it has  
327 been determined that the study treatment or participation is not the cause. Serious adverse events  
328 that are still ongoing at the end of the study period must be followed up to determine the final  
329 outcome. Any serious adverse event that occurs after the study period and is considered to be  
330 possibly related to the study treatment or study participation should be recorded and reported  
331 immediately.

332 **8.4 Stopping Rules**

333 We will do an interim analysis after reaching 50 patients, and if there is a significant  
334 difference (> 20%) in post operative mortality or morbidity in one group versus the other,  
335 then the study will be discontinued.

336 **8.5 Data and Safety Monitoring Plan**

337 It is the responsibility of the Principal Investigator to oversee the safety of the study at his/her  
338 site. This safety monitoring will include careful assessment and appropriate reporting of adverse  
339 events as noted above, as well as the compliance and implementation of the KCC data and safety-  
340 monitoring plan. Medical monitoring will include a regular assessment of the number and type of  
341 serious adverse events by both the assigned Medical Monitor and the KCC DSMC.  
342  
343

344 **8.5.1 Medical Monitoring and AE/SAE Reporting**

345 A Medical Monitor is assigned to this study at the Thomas Jefferson University. This is a  
346 physician/pharmacist who is not directly involved in the trial, and is not currently collaborating with  
347 the sponsor/investigator on any other trial. The role of the Medical Monitor is to review all  
348 reportable AEs/SAEs (in real-time) including grading, toxicity assignments, non-reportable AEs  
349 (quarterly), protocol violations/deviations, as well as all other safety data and activity data observed  
350 in the ongoing clinical trial occurring at the participating sites and at Thomas Jefferson University.  
351 The Medical Monitor may recommend reporting of adverse events and relevant safety data, and may  
352 also recommend suspension or termination of the study to the DSMC and TJU IRB.  
353

354 Every KCC investigator initiated protocol includes requirements for reporting of adverse events  
355 based on CTC 4.0. All events are reported to the IRB and Medical Monitor using a password  
356 protected web-site. In addition all unexpected and serious adverse events (SAEs) are reported to  
357 the TJU IRB and to the Food and Drug Administration (FDA) if applicable. The investigator is  
358 required to submit all unexpected and serious adverse events to the TJU IRB and the Medical  
359 Monitor within the timeframes outlined in the below table. All AE/SAEs will be reported to the  
360 DSMC at the quarterly DSMC review meetings; however, if the Medical Monitor determines  
361 corrective action is necessary, an “ad hoc” DSMC meeting will be called. ***Fatal adverse events  
362 related to treatment which are unexpected must be reported within 24 hours to the TJU IRB  
363 and the DSMC. Fatalities not related to the study drug/device must be reported within 5 days***  
364

365 **8.5.2 Data and Safety Monitoring Committee**

366 Data and Safety Monitoring Committee (DSMC) is the Data and Safety Monitoring Board  
367 (DSMB) for the KCC. The DSMC is a multidisciplinary committee charged with overseeing the  
368 monitoring of safety of participants in clinical trials, and the conduct, progress, validity, and  
369 integrity of the data for all clinical trials at the Thomas Jefferson University KCC. The committee  
370 meets quarterly to review the progress and safety of all active research protocols that are not  
371 monitored by another safety and data monitoring committee or board.

372       • The DSMC meets quarterly. Additional DSMC meetings are scheduled based on the  
373       nature and number of trials being monitored over a specified time period. The DSMC  
374       meets (by conference call) within 24 hours following the notification of an  
375       unexpected adverse event felt to be related to the study drug.  
376       • Prior to each DSMC meeting, each board member, is provided a printout of all  
377       reported AEs and SAEs occurring during the reporting period for this clinical trial.  
378       The principal investigator provides a detailed and comprehensive narrative  
379       assessment of current adverse events to date, indicating their possible significance and  
380       whether these toxicities have affected the conduct of the trial. DSMC members are  
381       provided with the principal investigator's assessment, a written report summarizing  
382       adverse events, safety data, and activity data observed during the specified time  
383       period described in each protocol, as well as  
384

385       recommendations from the Medical Monitor. A review of outcome results (response,  
386       toxicity and adverse events) and factors external to the study (such as scientific or  
387       therapeutic developments) is discussed, and the Committee votes on the status of each  
388       study.

389       • A summary of the board's action is sent to each investigator, the CCRRC and TJU  
390       IRBs. The DSMC actions may include recommendations/requirements that will lead  
391       to improved patient safety and/or efficacy, significant benefits or risks that have  
392       developed, or other changes determined to be necessary. The DSMC may also take  
393       note of slow accrual or lack of scientific progress, and refer such issues to the  
394       CCRRC. The DSMC provides the investigator with the rationale for any decision  
395       made.

396       The Thomas Jefferson University Data and Safety Monitoring Committee reviews all  
397       AE/SAE's on open protocols. Therefore, once AE/SAE reports from participating  
398       site are received by the Thomas Jefferson University Coordinating Site, a copy will be  
399       submitted to the TJU IRB/Medical Monitor/DSMB. Medical Monitor and DSMB  
400       review and monitoring of participating site AEs/SAEs will follow the TJU DSMP.  
401

402

## 403       9.0 DATA HANDLING AND RECORD KEEPING

### 404       9.1 Confidentiality

405       Information about study subjects will be kept confidential and managed according to the  
406       requirements of the Health Insurance Portability and Accountability Act of 1996 (HIPAA).  
407       Those regulations require a signed subject authorization informing the subject of the following:

408       • What protected health information (PHI) will be collected from subjects in this study  
409       • Who will have access to that information and why  
410       • Who will use or disclose that information  
411       • The rights of a research subject to revoke their authorization for use of their PHI.

412       In the event that a subject revokes authorization to collect or use PHI, the investigator, by  
413       regulation, retains the ability to use all information collected prior to the revocation of subject  
414       authorization. For subjects that have revoked authorization to collect or use PHI, attempts should  
415       be made to obtain permission to collect at least vital status (i.e. that the subject is alive) at the end  
416       of their scheduled study period.

417

418 9.2 Source Documents

419 Source data is all information, original records of clinical findings, observations, or other  
420 activities in a clinical trial necessary for the reconstruction and evaluation of the trial. Source  
421 data are contained in source documents Examples of these original documents, and data records  
422 include: hospital records, clinical and office charts, laboratory notes, memoranda, subjects'  
423 diaries or evaluation checklists, pharmacy dispensing records, recorded data from automated  
424 instruments, copies or transcriptions certified after verification as being accurate and complete,  
425 microfiches, photographic negatives, microfilm or magnetic media, x-rays, subject files, and  
426 records kept at the pharmacy, at the laboratories, and at medico-technical departments involved in  
427 the clinical trial.

428 9.3 Case Report Forms

429 The study case report form (CRF) is the primary data collection instrument for the study. All data  
430 requested on the CRF must be recorded. All missing data must be explained. If a space on the  
431 CRF is left blank because the procedure was not done or the question was not asked, write "N/D".  
432 If the item is not applicable to the individual case, write "N/A". All entries should be printed  
433 legibly in black ink. If any entry error has been made, to correct such an error, draw a single  
434 straight line through the incorrect entry and enter the correct data above it. All such changes must  
435 be initialed and dated. DO NOT ERASE OR WHITE OUT ERRORS. For clarification of  
436 illegible or uncertain entries, print the clarification above the item, then initial and date it.  
437

438 *Please refer to CRF in the Appendix*

439 9.4 Records Retention

440 It is the investigator's responsibility to retain study essential documents for at least 2 years after  
441 the last approval of a marketing application in their country and until there are no pending or  
442 contemplated marketing applications in their country or at least 2 years have elapsed since the  
443 formal discontinuation of clinical development of the investigational product. These documents  
444 should be retained for a longer period if required by an agreement with the sponsor. In such an  
445 instance, it is the responsibility of the sponsor to inform the investigator/institution as to when  
446 these documents no longer need to be retained.  
447

448 10.0 STUDY MONITORING, AUDITING, AND INSPECTING

449 10.1 Study Monitoring Plan

450 The investigator will allocate adequate time for monitoring activities. The Investigator will also  
451 ensure that the medical monitor or other compliance or quality assurance reviewer is given access  
452 to all the above noted study-related

453 documents and study related facilities (e.g. pharmacy, diagnostic laboratory, etc.), and has  
454 adequate space to conduct the monitoring visit.

455 10.2 Auditing and Inspecting

456 The investigator will permit study-related monitoring, audits, and inspections by the IRB, the  
457 funding sponsor, government regulatory bodies, and University compliance and quality assurance  
458 groups of all study related documents (e.g. source documents, regulatory documents, data

459 collection instruments, study data etc.). The investigator will ensure the capability for inspections  
460 of applicable study-related facilities (e.g. pharmacy, diagnostic laboratory, etc.).

461  
462 Participation as an investigator in this study implies acceptance of potential inspection by  
463 government regulatory authorities and applicable University compliance and quality assurance  
464 offices.

465

466 **10.2.1 Independent External and Internal Audits**

467 In addition to review by the DSMC, all studies initiated by KCC investigators are audited by an  
468 independent auditor once they have achieved 10% of target accrual. However, a study can be  
469 audited at any time based on recommendations by the IRB, DSMC, CCRRC and/or the Director  
470 of Clinical Investigations, KCC. Studies are re-audited once they have achieved 50% of target  
471 accrual. Special audits may be recommended by the IRB, DSMC or CCRRC based on prior  
472 findings, allegations of scientific misconduct and where significant irregularities are found  
473 through quality control procedures. Any irregularities identified as part of this process would  
474 result in a full audit of that study.

475

476 In addition to the audits at 10 and 50%, the CRMO randomly audits at least 10 percent of all  
477 patients entered into therapeutic KCC trials and other trials as necessary, on at least a bi-annual  
478 basis, to verify that there is a signed and dated patient consent form, the patient has met the  
479 eligibility criteria, and that SAEs are documented and reported to the TJU IRB.

480

481 All audit reports are submitted to the DSMC for review and action (when appropriate). A copy of  
482 this report and recommended DSMC action is sent to the CCRRC and TJU IRB. The committee  
483 regards the scientific review process as dynamic and constructive rather than punitive. The review  
484 process is designed to assist Principal Investigators in ensuring the safety of study subjects and  
485 the adequacy and accuracy of any data generated. The TJU IRB may, based on the DSMC and  
486 auditor's recommendation, suspend or terminate the trial.

487

488 **Coordinating Site Study Team**

489 Representatives from the Thomas Jefferson University Study Team will monitor on site at the  
490 participating site (or virtually if geographically impossible) within 4 weeks of the first subject  
491 enrolling.

492

493 Additional study monitoring by an independent auditing agency will be conducted at 10% and  
494 50% site accrual per the TJU Data and Safety Monitoring Plan. This will either occur on-site, if  
495 feasible, or will require participating sites to send TJU all source documents, patient charts, etc. to  
496 TJU for the audit.

497

498 **Study Team Conference Calls**

499 Teleconferences with the PIs, research nurses/coordinators, and regulatory staff will occur  
500 quarterly. This will be a forum to discuss study related issues including accrual, SAE/AEs  
501 experienced, study response, deviations/violations and study management issues. Minutes of  
502 these discussions will be taken to document the date of these meetings, the participants and the  
503 issues that were discussed. Copies of these minutes will be maintained in the Regulatory Binders  
504 at both sites.

505

506 **11.0 ETHICAL CONSIDERATIONS**

507 This study is to be conducted according to US and international standards of Good Clinical  
508 Practice (FDA Title 21 part 312 and International Conference on Harmonization guidelines),  
509 applicable government regulations and Institutional research policies and procedures.

510  
511 This protocol and any amendments will be submitted to a properly constituted independent  
512 Institutional Review Board (IRB), in agreement with local legal prescriptions, for formal approval  
513 of the study conduct. The decision of the IRB concerning the conduct of the study will be made  
514 in writing to the investigator before commencement of this study.

515  
516 All subjects for this study will be provided a consent form that is compliant with local and federal  
517 regulations, describing this study and providing sufficient information for subjects to make an  
518 informed decision about their participation in this study. See Attachment for a copy of the  
519 Subject Informed Consent Form. This consent form will be submitted with the protocol for  
520 review and approval by the IRB for the study. The formal consent of a subject, using the IRB-  
521 approved consent form, must be obtained before that subject is submitted to any study procedure.  
522 This consent form must be signed by the subject or legally acceptable surrogate, and the  
523 investigator-designated research professional obtaining the consent.

524

525 **12.0 STUDY FINANCES**

526 **12.1 Funding Source**

527 This is an unfunded study. The protocol prospectively tracks standard clinical care. It will be  
528 supported by the investigators, fellows, residents, and research coordinators in the Department of  
529 Surgery and the Division of Gastroenterology. There are no additional costs to the study

530

531 **12.2 Conflict of Interest**

532 Any investigator who has a conflict of interest with this study (patent ownership, royalties, or  
533 financial gain greater than the minimum allowable by their institution, etc.) must have the conflict  
534 reviewed by a properly constituted Conflict of Interest Committee with a Committee-sanctioned  
535 conflict management plan that has been reviewed and approved by the study sponsor prior to  
536 participation in this study. All Jefferson University Investigators will follow the TJU Conflicts of  
537 Interest Policy for Employees (107.03).

538 **13.0 PUBLICATION PLAN**

539 Neither the complete nor any part of the results of the study carried out under this protocol, nor  
540 any of the information provided by the sponsor for the purposes of performing the study, will be  
541 published or passed on to any third party without the consent of the study sponsor. Any  
542 investigator involved with this study is obligated to provide the sponsor with complete test results  
543 and all data derived from the study.

544

545 **14.0 REFERENCES**

546

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575

576

577 **15.0 APPENDICES**

578 *Include any attachments for this study (e.g. study schedule/visit chart from procedures section,  
579 Pill Diaries to be used, recruitment materials if applicable, AE Logs from section 5.2, Eligibility  
580 Checklist, Drug Reconciliation Form, etc.)*

581

582 *Appendix XX:*

583

Adverse event	Start date	SAE* 1. Yes (also complete SAE form) 2. No	Causality 1. Unrelated 2. Possibly Related	Severity 1. Mild 2. Moderate 3. Severe	Expectedness 1. Expected 2. Unexpected	DATE of assessment and INITIALS of delegated clinician	Outcome 1. Resolved 2. Ongoing	Date Resolved	AE Recorded by (initials)

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