

COVID-19-related OPTN Member Monitoring Changes

This supplement to the OPTN Member Evaluation Plan serves as a quick-reference guide to member monitoring changes implemented because of the COVID-19 pandemic. On April 3, 2020, the OPTN Executive Committee (Executive Committee) approved several emergency policies to suspend or modify certain existing policy requirements due to unforeseen circumstances that prevent patients from reaching the transplant program or other health care facility for needed testing or evaluation (April 3 COVID-19 Emergency Policy Package). On December 7, 2020, the OPTN Board of Directors (Board of Directors) approved these policy actions to remain in place until the Executive Committee determines that the COVID-19 pandemic no longer requires them. On March 1, 2021, the Executive Committee agreed to reinstate standard data submission requirements for transplant recipient and living donor data effective April 1, 2021. Additionally, on March 25, 2021, the Membership and Professional Standards Committee (MPSC) agreed to resume monitoring of transplant program functional activity and patient notification requirements described below, effective July 1, 2021.

Policy 1.4.F: Updates to Candidate Data during 2020 COVID-19 Emergency

For retrospective site survey reviews of candidate data that are used to maintain a candidate's prioritization or eligibility reported during the 2020 COVID-19 emergency:

- Site surveyors will continue to verify that candidate data entered in UNetSM is consistent with documentation in the candidate's medical record
- If a surveyor is unable to locate documentation in the medical record that corroborates the collection date entered in UNetSM, the surveyor will look for documentation that the transplant program exercised authority under Policy 1.4.F to re-report the candidate's most recently reported data on that date as the "collection date."

Additional Guidance:

An example of acceptable documentation would be a note in the candidate's medical record such as "[Date of note] – updated candidate record in Waitlist. Due to COVID-19 emergency actions, candidate's previously reported clinical data was reported with today's date."

Bylaws Appendix D.11: Review of Transplant Program Functional Activity

The MPSC will not send inquiries to transplant programs that do not perform the required minimum number of transplants during the period of March 13, 2020 through June 30, 2021. This change to MPSC monitoring is based on the recognition by the MPSC that the challenges faced by transplant hospitals due to the COVID-19 crisis may result in transplant programs' inability to perform the required minimum number of transplants. **The MPSC will resume sending inquiries to programs that do not meet functional activity requirements based on transplant activity data beginning July 1, 2021.**

Bylaws Appendix D.12.B: Patient Notification Requirements for Waiting List Inactivation

Although members are required to notify candidates when the transplant program is inactive, site surveyors will not review medical record documentation of patient notification for periods of waiting list inactivity that occurred from March 13, 2020 through June 30, 2021. **Site surveyors will resume reviewing medical record documentation of patient notification for periods of waiting list inactivity of 15 or more consecutive days that occur beginning July 1, 2021. Site surveyors will resume reviewing medical record documentation of patient notification for periods of waiting list inactivity of 28 or more cumulative days in a calendar year that occur beginning with calendar year 2022.**

Bylaws Appendix K.1.A: Program Component Cessation

From March 13, 2020 through June 30, 2021, a transplant program that notifies the OPTN of program component cessation will not be required to provide copies of the patient notices or the list of patients to whom the notice was provided to the OPTN Contractor for review. **Beginning July 1, 2021, a transplant program that notifies the OPTN of program component cessation will again be required to provide copies of patient notices and the list of patients to whom the notice was provided to the OPTN Contractor for review.**

Bylaws Appendix K.3.B: Notice to the Patients of Long-term Inactive Status

From March 13, 2020 through June 30, 2021, a transplant program that notifies the OPTN of long-term inactivation will not be required to provide copies of the patient notices or the list of patients to whom the notice was provided to the OPTN Contractor for review. **Beginning July 1, 2021, a transplant program that notifies the OPTN of long-term inactivation will again be required to provide copies of patient notices and the list of patients to whom the notice was provided to the OPTN Contractor for review.**