

***At-a-Glance***

**Clarify Policy Language and Process for Individual Wait Time Transfer**

- **Affected/Proposed Policy:** 3.6.C (Waiting Time Transfers)

- **Patient Affairs Committee**

Policy 3.6.C: Waiting Time Transfer does not completely and accurately describe the process that occurs when a candidate transfers primary waiting time from one transplant program to another. The Patient Affairs Committee proposes modifications to Policy 3.6.C so that it details the process and defines waiting time that is eligible for transfer. This proposal promotes the efficient management of the OPTN by describing the responsibilities of the both transplant programs and the OPTN Contractor in the individual waiting time transfer process. By defining waiting time that is eligible for transfer, this proposal also ensures that the waiting time transfer calculations are accurate and that the process is fair for all candidates.

- **Affected Groups**

Transplant Administrators  
Transplant Data Coordinators  
Transplant Program Directors  
Transplant Social Workers  
Organ Candidates

- **Number of Potential Candidates Affected**

Any candidate on the waiting list can potentially transfer primary waiting time to another transplant center. For the most recent three year period with complete data, waiting time transfers impacted fewer than 3,000 candidates (< 2%) each year.<sup>1</sup>

- **Compliance with OPTN Strategic Goals and Final Rule**

By defining transplant program and OPTN Contractor responsibilities in the individual waiting time transfer process, this proposal contributes to Strategic Plan Goal 6 to promote the efficient management of the OPTN. This proposal also contributes to the maintenance of an equitable organ allocation system, as required by the Final Rule.<sup>2</sup>

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<sup>1</sup> Based on OPTN data as of November 28, 2014. Refer to Table 1 for details.

<sup>2</sup> Code of Federal Regulations, Organ Procurement and Transplantation Network, title 42, sec. 121.8

## **Clarify Policy Language and Process for Individual Wait Time Transfer**

### **Affected/Proposed Policy:**

3.6.C (Waiting Time Transfers)

### **Patient Affairs Committee**

**Public comment response period:** January 27 – March 27, 2015

### **Summary and Goals of the Proposal:**

Policy 3.6.C: Waiting Time Transfer does not completely and accurately describe the process that occurs when a candidate transfers primary waiting time from one transplant program to another. The Patient Affairs Committee (hereafter, the Committee) proposes modifications to Policy 3.6.C so that it details the process and defines waiting time that is eligible for transfer. This proposal promotes the efficient management of the OPTN by describing the responsibilities of both transplant programs and the OPTN Contractor in the individual waiting time transfer process. By defining waiting time that is eligible for transfer, this proposal also ensures that the waiting time transfer calculations are accurate and that the process is fair for all candidates.

### **Background and Significance of the Proposal:**

Policy 3.6.C: Waiting Time Transfer does not completely and accurately describe the process that occurs when a candidate transfers primary waiting time from one transplant program to another. The Committee proposes modifications to Policy 3.6.C so that it details the individual waiting time transfer process and defines waiting time that is eligible for transfer. The Committee also proposes a correction to current policy, which states that the candidate must currently be registered at both transplant programs. The proposed policy states that the candidate only has to be registered at the new transplant program in order to transfer time from an earlier program. The proposed policy also allows a candidate to transfer time from an earlier registration even if the total time being transferred is less than the time the candidate has accrued during the newer registration.

The proposed policy more accurately describes the transplant program and OPTN Contractor responsibilities in the transfer process. Policy will now specify that the candidate must sign the Wait Time Transfer form, which the new program submits to UNOS. The program indicates on this form whether the candidate chooses to have multiple registrations. If the candidate does, then UNOS will exchange the primary qualifying date and accrued waiting time from the earlier to the new program. The primary qualifying date is the date and time the patient qualified to start accruing waiting time based on OPTN Policy. If the candidate does not choose to have multiple registrations, then UNOS will exchange the primary qualifying date and accrued waiting time from the earlier to the new program and remove the candidate from the earlier program's waiting list. The proposed policy requires that UNOS notify each of the programs of the completed transfer, which is current practice.

The only new requirement in this proposal is that the new program must notify, in whatever way it chooses, the candidate of their waiting time transfer status within 10 business days of receiving notification from UNOS. Although not currently required, programs already notify candidates of the outcome of the wait time transfer request as a best practice. Since the new program is the primary provider of care for the candidate, this requirement is not likely burdensome.

The proposed policy also defines waiting time that is eligible for transfer. Policy 3.6.C does not clearly explain how the OPTN calculates waiting time when transferring between two current listings or transferring from a removed registration. A candidate may not transfer time accrued at the earlier transplant program after the candidate has begun accruing time at the new transplant program. In other words, and as the proposed policy states, "time accrued simultaneously at more

than one program is only counted once.” If the candidate has been removed from the earlier program’s waiting list before being registered at the new program, the candidate cannot transfer the interval of time when not registered at either program, commonly referred to as “gap time.” Any time from the removed registration that was accrued concurrently with the new registration is not eligible for transfer.

The Committee worked closely with the UNOS Organ Center to ensure that this proposal accurately and completely reflects the individual waiting time transfer process. This proposal promotes the efficient management of the OPTN by describing the responsibilities of the transplant programs and UNOS in the individual waiting time transfer process. By defining waiting time that is eligible for transfer, this proposal also ensures that the waiting time transfer calculations are accurate and that the process is fair for all candidates.

**Supporting Evidence and/or Modeling:**

Any candidate on the waiting list can potentially transfer primary waiting time to another transplant center. For the most recent three year period with complete data, waiting time transfers impact fewer than 3,000 candidates (< 2%) each year. Though still very small at about 3%, kidney-pancreas had the greatest percentage of candidates that transferred waiting time during 2013. This is likely due to the fact that if a candidate’s registration changes from a kidney-pancreas to an isolated kidney or isolated pancreas, the candidate’s kidney-pancreas waiting time is automatically transferred to the new registration.<sup>3</sup> About 2% of kidney candidates consistently transfer waiting time each year, which may be attributed to longer overall waiting times and the relative importance of waiting time in kidney versus other organ allocations systems.

**Table 1. Candidates ever waiting from 2011-2013 by organ, year, and whether or not waiting time (WT) was transferred during the year**

Organ	2011		2012		2013	
	Candidates Ever Waiting During Year (N)	Candidates With WT Transfer During Year (N (%))	Candidates Ever Waiting During Year (N)	Candidates With WT Transfer During Year (N (%))	Candidates Ever Waiting During Year (N)	Candidates With WT Transfer During Year (N (%))
Heart	6,471	49 (0.8%)	6,662	53 (0.8%)	7,213	49 (0.7%)
Heart/Lung	120	1 (0.8%)	107	0	95	1 (1.1%)
Intestine	438	2 (0.5%)	423	2 (0.5%)	415	6 (1.4%)
Kidney	116,517	2,233 (1.9%)	120,387	2,664 (2.2%)	125,790	2,616 (2.1%)
Kidney-Pancreas	3,419	106 (3.1%)	3,399	122 (3.6%)	3,265	101 (3.1%)
Liver	26,740	132 (0.5%)	26,618	109 (0.4%)	26,726	202 (0.8%)
Lung	4,108	9 (0.2%)	3,909	8 (0.2%)	4,016	10 (0.2%)
Pancreas	1,955	34 (1.7%)	1,811	51 (2.8%)	1,706	10 (0.6%)
Total	154,574	2,454 (1.6%)	158,017	2,874 (1.8%)	163,850	2,894 (1.8%)

Based on OPTN data as of November 28, 2014

<sup>3</sup> Policy 11.4.D: Waiting Time Assignments for Kidney, Kidney-pancreas, and Islet Candidates, Organ Procurement and Transplantation (OPTN) Policies

**Expected Impact on Living Donors or Living Donation:**

Not applicable

**Expected Impact on Specific Patient Populations:**

No known impact on specific candidate populations

**Expected Impact on Program Goals, Strategic Plan, and Adherence to OPTN Final Rule:**

This proposal contributes to Strategic Plan Goal 6 to promote the efficient management of the OPTN because it describes transplant program and UNOS responsibilities in the individual waiting time transfer process. The Final Rule also requires the OPTN to develop policies for the equitable allocation of deceased donor organs.<sup>4</sup> By defining waiting time that is eligible for transfer, this proposal also ensures that the waiting time transfer calculations are accurate and that the process is fair for all candidates.

**Plan for Evaluating the Proposal:**

This proposal is designed to clarify in policy language the process for transferring waiting time. At UNOS, that process is facilitated by UNOS Organ Center staff. To evaluate this proposal, the Committee will receive and respond to questions from the UNOS Organ Center related to waiting time transfers. The Committee will review waiting time transfer data as needed to evaluate any possible unintended consequences.

This proposal was not based on any specific questions or issues that could be monitored by reviewing the number of waiting time transfers. Unclear policy language was not identified as a deterrent to or driver of waiting time transfers, and any change in waiting time transfers following the implementation of this proposal would reasonably be due to external factors.

**Additional Data Collection:**

This proposal does not require additional data collection.

**Expected Implementation Plan:**

If public comment is favorable, this proposal will be presented to the Board of Directors at their June, 2015 meeting. If approved, this policy will be implemented on September 1, 2015, since programming in UNet<sup>SM</sup> is not required. Upon implementation, programs that submit a Wait Time Transfer Form on a patient's behalf are required to notify the patient of the outcome of their request within 10 business days of receiving notification from UNOS. This policy will not require any other changes in the individual waiting time transfer process for either transplant programs or UNOS.

**Communication and Education Plan:**

The OPTN will follow established protocols to inform members of the public comment period and educate them on any policy changes through Policy Notices. This proposal will also be monitored for potential instructional opportunities, in order to give members, professionals and the transplant community an avenue to gain information, ask questions, and modify processes, if necessary. This proposal will continue to be monitored for instructional resource needs (i.e. individual wait time transfer guidance).

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<sup>4</sup> 42 CFR Sec. 121.8

## Compliance Monitoring:

At transplant hospitals, site surveyors will review a sample of medical records and any material incorporated into the medical record by reference, for documentation that the transplant hospital notified the patient within 10 days after receiving notification that the patient's waiting time has been transferred to the hospital.

## Policy Proposal:

Proposed new language is underlined (example) and language that is proposed for removal is struck through (~~example~~).

### 3.6.C Waiting Time Transfers

A candidate may transfer primary waiting time from one transplant ~~hospital~~ program to another if ~~it meets~~ all of the following requirements are met below:

1. The candidate must be registered at ~~both transplant hospitals~~ the new transplant program.
2. The candidate must currently be, or have previously been, registered at the earlier transplant program.
3. The candidate must sign a Wait Time Transfer Form, requesting transfer of primary waiting time to the new transplant program.
4. One of the transplant ~~hospitals~~ programs must submit a Wait Time Transfer Form to the OPTN Contractor.
5. ~~The OPTN Contractor will transfer the primary qualifying date and waiting time accrued from the earlier transplant hospital to the new transplant hospital.~~
6. ~~If the candidate chooses not to have multiple registrations, the OPTN Contractor will remove the candidate from the waiting list of the earlier transplant hospital.~~

The OPTN Contractor will transfer the primary qualifying date and waiting time accrued from the earlier transplant program to the new transplant program. However, time accrued at the earlier transplant program, after the candidate began accruing waiting time at the new transplant program, will not be transferred.

The OPTN Contractor will notify each of the transplant programs involved of the completed transfer of waiting time. The new transplant program must notify the candidate of the waiting time transfer status within 10 business days of receiving notification from the OPTN Contractor.

If the candidate chooses to have multiple registrations, the OPTN Contractor will exchange the primary qualifying date and waiting time accrued from the earlier transplant ~~hospital~~ program that had the primary qualifying date and waiting time with the more recent to the new transplant hospital program.

If the candidate chooses not to have multiple registrations, then the OPTN Contractor will:

- Transfer the primary qualifying date and accrued waiting time from the earlier transplant program to the new transplant program and,
- Remove the candidate from the waiting list of the earlier transplant program.

If the candidate is removed from the waiting list at the earlier transplant program before being registered at the new transplant program, the OPTN Contractor will add the waiting time accrued at the earlier transplant program to the waiting time accrued at the new program.

The OPTN Contractor will not include time between removal at the earlier transplant program and registration at the new program in the candidate's waiting time.

Time accrued simultaneously at more than one program is only counted once.