Public Comment Proposal


OPTN/UNOS Minority Affairs Committee

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Executive Summary

Blood type B candidates, a blood group more common in underrepresented minorities, have longer kidney waiting times. In December 2014, the new Kidney Allocation System (KAS) became effective, including Policy 8.5.D: Allocation of Kidneys by Blood Type, which allows for blood types A, non-A1 and AB, non-A1B kidneys to be transplanted to blood type B recipients who meet certain criteria. Allocation of deceased donor kidneys from blood group A, non-A1 and AB, non-A1B to blood group B kidney recipients has improved transplant rates among disadvantaged blood group B patients with equivalent long-term graft outcomes compared to blood type compatible transplants. However, the 18 month KAS post-implementation data analysis revealed that an overwhelming majority of transplant programs (82 percent) do not perform any non-A1/non-A1B (A2/A2B) transplants and that overall transplant programs have not taken advantage of this policy change, which provides greater access to deceased donor kidneys for disadvantaged blood group B candidates. Further, a 2016 OPTN/UNOS Minority Affairs Committee (MAC) survey to all active U.S. kidney transplant programs revealed that many programs cited difficulty in establishing a protocol for patient enrollment as the major barrier to performing these transplants. Specifically, the transplant programs identified the following obstacles when developing the required protocols to participate in non-A1 transplants:

- Difficulty establishing titer thresholds (32 percent)
- Difficulty developing an informed consent policy (21 percent)
- Difficulty determining patient eligibility (18 percent)

OPTN/UNOS policy allows each transplant program to develop and implement protocols for determining candidate eligibility, but many established programs follow similar practices for protocol. Based on the survey findings, these best practices are offered in a guidance document as an effort to increase the number of kidney transplant programs that perform non-A1/non-A1B (A2/A2B) transplants.

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1. OPTN Policies, Section 8.5D: Allocations of Kidney by Blood Type

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increase in the number of programs using this provision can increase equity in access to transplants for disadvantaged blood group B candidates, due to a greater number of potential donor matches.

Is the sponsoring Committee requesting specific feedback or input about this resource?

The Committee requests the following feedback:
- Are there any additional resources that would be helpful in non-A_1/non-A_1B (A_2/A_2B) provision implementation at your center?
- Do you think developing a non-A_1/non-A_1B (A_2/A_2B) protocol will increase the number of kidney transplants performed at your center?
- What is the burden, including financial or staff burden, to programs or labs to implement the guidance?

What problem will this resource address?

Blood group B candidates typically experience longer waiting times than blood groups AB and A, with the majority of waitlisted candidates classified as minority. Based on OPTN data as of June 9, 2017, blood type B candidates ever on the kidney waiting list in 2016 were composed of 72.7% minority candidates, defined as Black, Asian, Hispanic, American Indian/Alaska Native, Native Hawaiian/other Pacific Island, and multiracial candidates. There is a strong potential to reduce waiting time and increase the number of transplants for blood group B candidates, based on these statistics.

The vast majority of blood type B candidates have not been indicated in UNet™ as willing to accept a subtype-compatible kidney, and the majority of transplant programs do not perform these type of transplants. A voluntary provision under KAS allows for this match, increasing the potential matches for blood type B candidates. There has been a very small increase in transplants for this population since the implementation of the KAS in 2015, despite much larger potential.

A 2016 survey, conducted by the MAC workgroup, indicates that non-participant programs request protocol and testing guidance to implement the provision.

The intent of the Minority Affairs Committee is to suggest protocol guidance to increase the number of programs participating in the voluntary provision to allow non-A_1/non-A_1B (A_2/A_2B) donors to match with blood group B candidates. Data from participant programs indicates a decrease in wait time for blood group B candidates.

Why should you support this resource?

Non-A_1/non-A_1B (A_2/A_2B) to B blood group B kidney transplantation has improved transplant rates among disadvantaged blood group B patients with equivalent long-term graft outcomes. OPTN data collected 6 months post-KAS indicated very few (447 of 11,182, or 4.0%) of active blood type B registrations were listed as eligible and willing to accept a subtype non-A_1/non-A_1B (A_2/A_2B) kidney. Far more have been reported as ineligible (16.4%), while the majority still have unknown status (79.2%).

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8 Williams WW, Cherikh WS, Young CJ et al.
OPTN data collected 18 months post-KAS indicates a majority of transplant centers (82%) do not perform non-A1/non-A1B (A2/A2B) to blood type B transplants.¹⁰

Before a transplant center may perform non-A1/non-A1B (A2/A2B) to blood type B transplants, they must develop a protocol for these transplants. In a survey conducted by the Committee in July 2016, non-participant center respondents cited difficulty in developing protocols, including development of titer thresholds and an informed consent policy. A majority of non-participant center respondents stated that guidance for best practices would be helpful in non-A1/non-A1B (A2/A2B) to blood type B participation (Figure 1).

**Figure 1: Which of the following could help you establish an A2/A2B into B blood type protocol at your center?**

- **Education for transplant team**: 11 responses
- **Education for lab**: 8 responses
- **Education for OPO**: 7 responses
- **Guidance on best practices**: 17 responses
- **More user-friendly UNet interface**: 4 responses
- **Longer-term outcomes data**: 14 responses
- **Not interested**: 6 responses

**How was this resource developed?**

Following a June 2015 progress review of the Kidney Allocation System (KAS) during a teleconference meeting, it was suggested that the Minority Affairs Committee (MAC) may want to consider sponsoring a project to provide guidance or education to programs wishing to obtain greater access for blood group B candidates.

The MAC discussed the idea at a September 2015 in-person meeting, in which the idea was well-received. UNOS research staff indicated that the lack of available lab facilities in certain regions and the additional cost of titer tests to match a greater number of donors to potential recipients may be impediments to program participation. Feedback from fall 2015 regional meetings suggested that the OPTN should encourage more programs to participate in the non-A1/non-A1B (A2/A2B) to blood group B candidate provision.

The MAC formed a workgroup in October 2015 to begin gathering information on why transplant do not participate in the provision. The workgroup included Committee members of Minority Affairs, Kidney, and Transplant Administrators (TAC). The Histocompatibility Committee declined to participate, but offered to review any work outcome.

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The workgroup reviewed OPTN data and research literature indicating various reasons to explain why centers were not participating in the provision, eventually deciding to deploy a survey to kidney transplant program administrators. Over the next several months, staff and the workgroup developed approximately ten survey questions to gather data on the number of programs participating, and to understand why eligible programs are not participating and what would cause them to become participants.

The electronic survey was sent to all kidney program administrators in July 2016. The response rate was 22 percent. Results indicated a desire to create a guidance document (see Figure 1 above) to advise centers on implementation of the provision. The workgroup agreed and also supported an effort to create an instructional effort to complement guidance.

While the workgroup drafted recommended protocols in the winter and spring of 2017, the workgroup’s survey results were presented during an oral session at the Transplant Management Forum (April 2017) and as a poster presentation at the American Transplant Congress (May 2017).

Workgroup meetings centered on discussion of the protocol development, including titer testing, candidate informed consent, and confirmation of candidate eligibility to receive organ offers. The workgroup felt that more specific expertise was required to draft the titer threshold considerations and the titer variability guidance, so input from a blood bank administrator, followed by review from the Histocompatibility Committee leadership was requested. The workgroup accepted the draft titer protocol offered.

The workgroup changed the guidance title from A2/A2B to blood group B to non-A1/non-A1B (A2/A2B) to blood group B in order to be consistent with language used in OPTN policy.

Kidney Committee leadership reviewed the draft guidance and suggested some additional citations to data evidence, while one Kidney member questioned adding any titer level recommendations at all. Histocompatibility leadership added language to this section to reassure the institutions that OPTN/UNOS policy allows each transplant program to develop and implement its own approach for ascertaining the appropriate method and threshold.

The Transplant Administrators Committee reviewed the section suggesting potential financial impact to implement the guidance. They agreed with the potential implementation and recurring impact resources to transplant centers.

The Minority Affairs Committee approved the guidance for Public Comment on June 8, 2017.

**How well does this resource address the problem statement?**

The Committee believes this guidance document will assist to increase the number of programs performing non-A1/non-A1B (A2/A2B) to blood group B transplants, therefore increasing the number of transplants for this disadvantaged group. If the transplant rate for blood group B candidates is increased, wait time should be reduced, providing greater equity in access for these candidates.

<table>
<thead>
<tr>
<th>Candidate Blood Type</th>
<th>Average Waiting Time (in years)</th>
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</thead>
<tbody>
<tr>
<td>AB</td>
<td>2</td>
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<td>A</td>
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<td>O</td>
<td>5</td>
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<td>B</td>
<td>6</td>
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As of the 6-month post-implementation report, 47 non-A1/non-A1B (A2/A2B) to blood group B transplants had occurred during the six months after KAS implementation compared to just six over the six months prior to KAS. This guidance suggests protocols for titer testing, consent development, and routine update of candidate eligibility can increase the rate of transplants among candidates. The suggestions are based on survey results and the practices of established programs, but may not be ideal for all circumstances or cases. Expenses to establish and maintain the provision may vary among programs.

Which populations are impacted by this resource?

Based on OPTN data as of June 9, 2017, blood type B candidates ever on the kidney waiting list in 2016 were composed of 72.7% minority candidates, defined as Black, Asian, Hispanic, American Indian/Alaska Native, Native Hawaiian/other Pacific Island, and multiracial candidates. There is a strong potential to reduce waiting time and increase transplants for this population by matching the more common non-A1/non-A1B (A2/A2B) to blood group B candidates, based on these statistics.

How does this resource impact the OPTN Strategic Plan?

1. Increase the number of transplants: There is no evidence that implementation of the guidance will increase the number of transplants overall, but if more programs participate in this KAS provision, a greater number of non-A1/non-A1B (A2/A2B) to blood group B transplants may result.
2. Improve equity in access to transplants: The primary intent of this guidance is to increase equity in access to transplants for the disadvantaged blood group B recipients, with a high percentage of minorities, experiencing longer wait times.
3. Improve waitlisted patient, living donor, and transplant recipient outcomes: Wait time for the less common blood group B candidates, experiencing longer wait times, may decrease if a greater number of donor matches exist.
4. Promote living donor and transplant recipient safety: There is no impact to this goal.
5. Promote the efficient management of the OPTN: There is no impact to this goal.

How will the OPTN implement this resource?

Due to community interest in this topic, an instructional program, spotlighting established programs matching non-A1/non-A1B (A2/A2B) to blood group B candidates, would be developed once the guidance is approved by the Board. The OPTN will communicate this new information through TransplantPro and the OPTN website, linking the information to related guidance, as well. The instructional program would be housed on UNOS Connect and promoted through all available and appropriate channels.

How will members implement this resource?

Transplant Hospitals

If programs choose to develop protocols consistent with this guidance, they must work closely with labs to implement the provision and to establish titer levels for candidate eligibility. Additional staff effort includes a greater amount of time per candidate to provide education on protocol and to periodically reconfirm candidate eligibility. New costs will exist for additional tests to match candidates with donors and to reconfirm candidate eligibility while wait-listed.

Histocompatibility Laboratories

Labs must work closely with their respective renal transplant program(s) to establish a policy that indicates the appropriate titer levels for determining candidate eligibility and defines the frequency of titer testing. New costs will exist for the additional testing, while total cost will depend on the recommended

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frequency of testing for a given candidate. Additional staff time may be needed to pull samples to send to a local blood bank for testing.

**Will this resource require members to submit additional data?**

No additional data submission will be required at this time.

**How will members be evaluated for compliance with this resource?**

Guidance from the OPTN does not carry the weight of policies or bylaws. Therefore, members will not be evaluated for compliance with this document.

**How will the sponsoring Committee evaluate whether this resource was successful post implementation?**

It is not possible to establish causal relationship between a change in number of programs participating in the non-A₁/non-A₁B (A₂/A₂B) to blood group B provision and the release of this guidance document and corresponding education/outreach. In order to assess if the guidance and related education/outreach has positively impacted disadvantaged blood group B candidates, the Committee will monitor the number of programs participating in this provision and the median waitlist time for blood type B candidates. This data is currently compiled as part of the monitoring plan for the KAS and reported every six months. UNOS staff will report this information to the Committee at six-month intervals following consideration by the Board. This guidance will be updated as needed based on review by experts in the field.
Summary and Goals

B candidates, a blood group more common in underrepresented minorities, have longer kidneys waiting times. In December 2014, the new Kidney Allocation System (KAS) went into effect, including Policy 8.5.D: Allocation of Kidneys by Blood Type, which allows for blood types A, non-A1 and AB, non-A1B kidneys to be transplanted to blood type B recipients who meet certain criteria. Allocation of deceased donor kidneys from blood group A, non-A1 and AB, non-A1B to blood group B kidney recipients has improved transplant rates among disadvantaged blood group B patients with equivalent long-term graft outcomes compared to blood type compatible transplants. However, the 18 month KAS post-implementation data analysis revealed that an overwhelming majority of transplant programs (82 percent) do not perform any non-A1/non-A1B (A2/A2B) transplants and that overall transplant programs have not taken advantage of this policy change, which provides greater access to deceased donor kidneys for disadvantaged blood group B candidates. Further, a 2016 OPTN/UNOS Minority Affairs Committee (MAC) survey to all active U.S. kidney transplant programs revealed that many programs cited a difficulty in establishing a protocol for patient enrollment as the major barrier to performing these transplants. Specifically, the transplant programs identified the following obstacles when developing the required protocols to participate in non-A1 transplants:

- Difficulty establishing titer thresholds (32 percent)
- Difficulty developing an informed consent policy (21 percent)
- Difficulty determining patient eligibility (18 percent)

Based on these survey findings, these best practice guidelines are offered in an effort to increase the number of kidney transplant programs that perform non-A1/non-A1B (A2/A2B) transplants.

1 OPTN Policies, Section 8.5D: Allocations of Kidney by Blood Type
### Background

One of the factors impacting access to transplantation is candidate blood type, and it has been well-established that blood group O and B candidates have longer waiting times as shown in the table below.\(^5\)

<table>
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Blood group B candidates comprise 16 percent of candidates listed on the kidney transplant waiting list per OPTN data as of November 14, 2016, but received only 13 percent of the total kidney transplants between January 1, 2015 and September 30 2016. Furthermore, blood group B candidates on the kidney waiting list in 2016 were composed of 72.7 percent minority candidates, defined as Black, Asian, Hispanic, American Indian/Alaska Native, Native Hawaiian/other Pacific Island, and multiracial candidates, this disparity affects minority populations most of all.\(^3\)

Multiple studies have demonstrated the safe and effective transplantation of blood group B kidney transplant recipients with kidneys from donors having the less immunogenic, non-A\(_1\) subtype. Equivalent long-term graft outcomes have been demonstrated after the transplantation of non-A\(_1\)/non-A\(_1\)B (A\(_2\)/A\(_2\)B) donor kidneys into blood group B recipients as compared to blood type compatible transplantation.\(^6\)\(^7\)\(^8\)\(^9\)\(^10\)

As such, the new kidney allocation system (KAS) included the provision to allow non-A\(_1\) transplant to provide better equity among candidate blood types, which likely includes minority groups disadvantaged on the transplant waiting list. According to an 18-month KAS post-implementation analysis, there has been an increase in non-A\(_1\)/non-A\(_1\)B (A\(_2\)/A\(_2\)B) deceased donor kidney transplants, but still many candidates who could benefit from these transplants are not registered for these organs.\(^11\)

### Recommendations for Protocol Development

Participant transplant programs must develop a program-specific written protocol in order to receive offers of non-A\(_1\) deceased donor kidneys for their blood group B candidates. This written protocol must include:

1. The maximum titer levels for candidate eligibility
2. The process for obtaining informed written consent from each blood group B candidate for acceptance of a non-A\(_1\) kidney
3. Confirmation of each candidate’s eligibility every 90 days in UNet\(^\text{TM}\)

The guidelines below for developing each of these protocol requirements are based on MAC survey results, literature reviews, and sample policy and informed consent forms provided by several transplant programs.

\(^6\) Forbes RC, Feurer ID, Shaffer D.
\(^10\) Williams WW, Cherikh WS, Young CJ et al.
\(^11\) Aeder, Mark.
programs who are already performing these transplants.

1) Titer Testing of the Blood Group B Candidate

OPTN/UNOS policy allows each transplant program to develop and implement its own approach for ascertaining the appropriate method and threshold for anti-A titers used in determining candidate eligibility. The information below is summarized from published literature and is provided for informational use only.

Most programs perform anti-A\textsubscript{1} titer typing through their local hospital blood bank and use different methods for titer detection. The majority of respondent transplant programs participating in the survey use an anti-A titer cutoff of 1:8 as acceptable for candidate eligibility, but it is up to an individual program to determine titer thresholds. Some programs are more comfortable using a more stringent cutoff of 1:4 to determine candidate eligibility, and it's worth noting that the original outcomes data used this more stringent titer threshold. To confirm eligibility, the survey showed that most programs require two consecutive titer results.

**Specific Considerations for Labs Performing Titer Testing:**

The identification of red blood cell antibodies as IgM or IgG provides useful information. The use of DTT (dithiothreitol) has been used in blood banking for decades to distinguish one type of antibody from the other since DTT can inactivate IgM in the patient's serum; however, it does not interfere with IgG. Therefore, since IgM is the predominant Ig class of anti A produced by blood group B individuals, the use of DTT in the patient's serum sample and in controls is necessary to distinguish between the two types of antibodies. The use of serial dilutions with and without DTT on patient serum and controls such as anti-P\textsubscript{1} antisera, high IgG control, and IgM control are necessary to prove that the titer of anti-A determined is indeed an IgM. Note that early studies demonstrating the success of non-A\textsubscript{1} kidneys into B recipients used predominantly IgG titers.

**Specific Considerations for Titer Testing:**

- **High control IgG:** is an IgG antibody that should result in a titer >8 before DTT treatment and not be reduced after DTT treatment, maintaining a titer >8.
- **High titer IgM antibody control is an IgM antibody that should result in a titer of >8 without DTT treatment and be reduced by DTT treatment to a titer <8.**
- **Anti-P\textsubscript{1} antisera is a low level IgM antibody that should have a positive result undiluted and be reduced by DTT treatment to a negative result.**

The use of AHG (anti-human globulin) is not necessary to determine IgM titers; however, some programs might be concerned with low titer anti-A\textsubscript{1} IgG that the B recipient might produce. AHG simply increases the sensitivity or detection of low titer IgG antibodies only. This is called the indirect antiglobulin or Coombs Test.

**Titer Variability:**

Antibody titer reproducibility intra and inter laboratory is still a major point of concern. The lack of reagent standardization and the multiple method in use contribute to titer variability among labs. In an effort to control such variability, Thorpe et al reported on an international collaborative study using a World Health Organization (WHO) reference reagent to try to standardize haemagglutination testing for anti-A and anti-B titers in serum and plasma.\textsuperscript{12} In this study where 300 samples were tested among 24 laboratories in different countries, they reported an 8 to 64 fold variation in titers per preparation and methods across laboratories. However, the intra-laboratory variability was generally good with over 90 percent of replicate titers within a 2 fold rage.

The problem with such a wide variability among laboratories is multi-factorial. There is no

standardized procedure; there are multiple methods (gel vs. tube), diluent, incubation times, cutoff
reading and testing cell among others. The College of American Pathologists (CAP) proficiency
testing titer surveys from 2014-2016 indicate that the gel method produces a closer range in variation
when compared to the tube method. The gel method has shown to be more consistent and more
sensitive and less subjective than the tube method, according to the American Association of Blood
Banks (AABB). However, the gel tube method for A subgroup typing of samples is not yet approved
by the FDA. Laboratories that want to use this method for A subgroup typing must validate the
protocol for its use.

2) Obtaining Candidate Informed Consent for Acceptance of Non-
A₁/non-A₁B (A₂/A₂B) Type Kidneys

The following items should be included in the protocol for obtaining candidate informed consent:

- Create a general statement about why it’s advantageous to receive offers of non-A₁/non-A₁B
  (A₂/A₂B) deceased donor kidneys, emphasizing that blood group B candidates have historically
  the lowest rate of transplant. In addition, a statement regarding the similarity between transplant
  outcomes with non-A₁/non-A₁B (A₂/A₂B) donation to B blood group recipients.
- Include both the risks and benefits. Benefits could include more organ offers, with the possibility
  of an earlier transplant. Risks should include that participants are always at risk for rejection but
  there is no current evidence that the risk for rejection is higher in blood group B recipients with
  low anti-A IgG titer who have received non-A₁/non-A₁B (A₂/A₂B) kidneys in comparison to blood
  group B matched kidneys.
- Include a statement on how often you will require the recipient to come in for a blood draw to
  obtain anti-A titers.
- Include a statement that the program has explained the nature, risks, and benefits to accepting
  non-A₁/non-A₁B (A₂/A₂B) deceased donor kidneys and has answered all of the candidate’s
  questions.

The candidate, as well as the program representative obtaining consent, must sign the form. It is also
recommended that candidates be informed of additional program-specific care requirements that may
come along with acceptance of a non-A₁/non-A₁B (A₂/A₂B) deceased donor kidneys (for example,
additional blood draws, biopsies).

3) Confirming Eligibility to Receive Non-A₁/non-A₁B (A₂/A₂B)
Deceased Donor Organ Offers

Programs must confirm non-A₁/non-A₁B (A₂/A₂B) eligible candidates every 90 days in UNet. A
transplant program has discretion for how frequently titers are re-checked. Some programs require
confirmatory titer testing every 90 days for eligibility, while other programs perform testing less
frequently, in addition to UNet confirmation every 90 days.
## Summary Chart: Non-A₁/non-A₁B (A₂/A₂B) Protocol Development Recommendations

<table>
<thead>
<tr>
<th>Protocol Requirements</th>
<th>Key Components</th>
<th>Examples of Program Variability</th>
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</thead>
</table>
| **Maximum Titer Levels** | 1. Titer testing methodology (see “Specific Considerations for Labs”)  
2. Establish Titer Cutoff (discretion of transplant program)  
3. Confirm Eligibility | ≤ 1:4 (more stringent)  
1:8 (most common)  
≥ 1:16 (less stringent)  
Two consecutive titer tiers |
| **Consent Development** | 1. Develop statement about why it’s advantageous to receive offers of Non-A₁/non-A₁B (A₂/A₂B) deceased donor kidneys  
2. Develop Statement of risks/benefits  
3. Develop Statement on specified requirements for maintaining eligibility  
1. 4. Create statement of acknowledgement by both patient and physician | Frequency of lab draw |
| **Routine Update of Candidate Eligibility (UNet)** | Confirmation of Eligibility every 90 days | Either of the following:  
• Repeat titer testing every 90 days  
• Less frequent titer testing (semiannual, annual), but with UNet confirmation every 90 days |

## Possible Financial Implications and Other Concerns

In order to begin transplantation of non-A₁/non-A₁B (A₂/A₂B) deceased donor kidneys into blood group B candidates, there is a modest financial investment at start-up followed by ongoing expense for each candidate. The following table describes the approximate resources that are needed to prepare your program for implementation. Expenses will vary from program to program and are intended as a framework for beginning analysis within your own program. You could adopt best practices from other programs, which could markedly reduce the initial investment.

All pre-transplant efforts should be considered for reimbursement under the Medicare cost report and included in your institution’s standard acquisition charge for kidney transplants. The remainder of the services should be reimbursed through third party payers as customary and contracted by your institution.
### Potential One-Time Implementation Staff Effort:

- ✓ Review of Draft Protocols
- ✓ Protocol Development
- ✓ Development of informed consent document
- ✓ Coordination with blood bank to educate and clarify blood use and typing
- ✓ Coordination with histocompatibility laboratory to establish order set, non-A1 titer process and associated EMR changes as needed
- ✓ Training Development
- ✓ Staff Training

### Potential Recurring Per Patient Effort:

- ✓ Description
- ✓ Education of Patient
- ✓ Consent of patient
- ✓ Pre-authorization for non-A1/non-A1B titer test (IgG titration)
- ✓ Standing order placement for quarterly non-A1/non-A1B titers (IgG titration)
- ✓ Review and UNet<sup>®</sup> reporting of non-A1/non-A1B titers at evaluation and confirmation every 90 days
- ✓ non-A1/non-A1B titer testing for both evaluation and maintenance

## Conclusion

One of the primary goals of the KAS is to broaden patient access for historically disadvantaged kidney transplant candidates, which includes blood group B candidates, who have experienced greater waiting times compared to other blood groups. Available data support that access to non-A1/non-A1B (A2/A2B) donor kidneys has improved transplant rates for blood group B candidates and has effectively shortened wait times for this population. Use of the non-A1/non-A1B (A2/A2B) provision for blood group B candidates is not automatic and requires transplant program protocol development and maintenance. The guidelines provided in this document will aid transplant programs interested in protocol development.