

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 2020 COVID-19 pandemic. On April 3, 2020, the 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 July 30, 2020, the OPTN Executive Committee approved an extension to these emergency policies through December 31, 2020, and we have updated this document to reflect the new end date for these policies.

We will continue to update this document with any additional monitoring changes implemented during this event, and to reflect updated effective periods as may be approved by the Executive Committee or Board of Directors.

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."

Policy 18.5.A: Reporting Requirements after Living Kidney Donation

Living donor follow-up forms (LDFs) that are due between March 13, 2020 and December 31, 2020 are excluded from living donor data reporting requirements. This action is a result of the COVID-19 emergency data submission policy changes approved in the April 3 COVID-19 Emergency Policy Package.

Policy 18.5.B: Reporting Requirements after Living Liver Donation

Living donor follow-up forms (LDFs) that are due between March 13, 2020 and December 31, 2020 are excluded from living donor data reporting requirements. This action is a result of the COVID-19 emergency data submission policy changes approved in the April 3 COVID-19 Emergency Policy Package.

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

The Membership and Professional Standards Committee (MPSC) will not send inquiries to transplant programs that do not perform the required minimum number of transplants during a period from March 13, 2020 through December 31, 2020. 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.

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 during the period of March 13, 2020 through December 31, 2020.

Bylaws Appendix K.1.A: Program Component Cessation

A transplant program that notifies the OPTN of component cessation during the period of March 13, 2020 through December 31, 2020 will not be required to provide the OPTN Contractor copies of the patient notices or the list of patients to whom the notice was provided.

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

A transplant program that notifies the OPTN of long-term inactivation during the period of March 13, 2020 through December 31, 2020 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.