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 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.

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 UNet℠ 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 UNet℠, 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 beginning March 13, 2020 and until a date yet to be determined by the Executive Committee are excluded from living donor data reporting requirements. However, members are encouraged to enter data if the data are available.

Policy 18.5.B: Reporting Requirements after Living Liver Donation

Living donor follow-up forms (LDFs) that are due beginning March 13, 2020 and until a date yet to be determined by the Executive Committee are excluded from living donor data reporting requirements. However, members are encouraged to enter data if the data are available.
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 beginning March 13, 2020 and until the MPSC determines it is appropriate to resume monitoring. 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 beginning March 13, 2020, until the MPSC determines it is appropriate to resume monitoring.

Bylaws Appendix K.1.A: Program Component Cessation

Beginning March 13, 2020 and until the MPSC determines it is appropriate to resume monitoring, 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.

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

Beginning March 13, 2020 and until the MPSC determines it is appropriate to resume monitoring, 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.