


Briefing to the OPTN Board of Directors on
Guidance and Policy Modifications
Addressing Blood Type Determination

OPTN Operations and Safety Committee

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Guidance and Policy Modifications Addressing Blood Type Determination

<i>Affected Policies:</i>	<p>2.6.A: Deceased Donor Blood Type Determination</p> <p>2.6.B: Deceased Donor Blood Subtype Determination</p> <p>2.6.C: Reporting of Deceased Donor Blood Type</p> <p>3.3.A: Candidate Blood Type Determination</p> <p>3.3.B: Reporting of Candidate Blood Type</p> <p>14.5.A: Living Donor Blood Type Determination</p> <p>14.5.B: Living Donor Blood Subtype Determination</p> <p>14.5.C: Reporting of Living Donor Blood Type and Subtype</p>
<i>Sponsoring Committee:</i>	Operations and Safety
<i>Public Comment Period:</i>	January 22, 2020 – March 24, 2020
<i>Board of Directors Date:</i>	June 8, 2020

Executive Summary

The OPTN Operations and Safety Committee is charged with ensuring the safety of the organ donation and transplantation process. The Committee periodically reviews transplant and donation-related adverse events and near misses reported to the OPTN by the transplant community. The Committee uses the information to identify potential improvements and policy revisions that may prevent future such occurrences. Recent reports of events affecting patient safety led to the decision to re-evaluate the requirements for blood type determination. The Committee agreed to develop both a guidance document and policy changes.

This proposal provides proposed policy changes and guidance that will promote awareness about situations that could potentially affect the reliability of blood typing results.

- **Policy:** Current policy only references conflicting results. The proposed policy changes will establish additional requirements for host OPOs, transplant hospitals, and recovery hospitals (for living donors) to include a process in their written protocols for addressing indeterminate blood typing results. Additionally, host OPOs will be required to document all blood products the deceased donor received since admission to the donor hospital. The proposed policy changes will align deceased donor policies with candidate and living donor policies.
- **Guidance:** The guidance document serves as a resource that seeks to alert OPOs of triggers and other factors that can cause blood typing discrepancies, identify alternative methods of blood typing, and provide information that addresses conflicting and indeterminate blood type results. The guidance document does not create or change OPTN policy.

The proposed policy changes and guidance document promote living donor and transplant recipient safety under the authority of CFR §121.6(a).

Both the policy proposal and guidance document were supported throughout public comment. The feedback received during public comment did not result in any modifications post-public comment.

Background

In 2014, the Operations and Safety Committee (hereafter “the Committee”) performed a Failure Modes and Effects Analysis (FMEA)¹, where all stages of ABO testing were extensively reviewed. Based on this analysis, there were ABO policy changes that were implemented. At the time, when there was no pre-transfusion specimen available for testing, the Committee’s response was to create a policy requirement for Organ Procurement Organizations (OPOs) to have their own protocol. Recent reports of events affecting patient safety led to the decision to re-evaluate the requirements for verifying deceased donor blood type.

One of the events that led to the development of this proposal was a case where massive transfusions in a donor affected the deceased donor blood typing results. The Committee agreed to take a holistic approach to address all factors that might influence blood typing results and not simply focus on massive transfusions.

The Committee formed a joint Workgroup with representation from the following OPTN Committees: Operations and Safety, Membership and Professional Standards, Organ Procurement Organization, and Histocompatibility. The Workgroup also included blood bank experts. The development of the project involved discussions on various topics to better understand the factors that can lead to indeterminate or conflicting blood typing results, and the current practices performed to resolve them. It was determined that the guidance document should create awareness of the various factors that can contribute to indeterminate or conflicting results and the alternative methodologies that are available and should be considered to resolve these cases.

The Workgroup discussed the triggers that can contribute to indeterminate or conflicting blood type results. There was also discussion around the inability to determine a timeframe for when the patient’s true blood type is measured after having a massive blood transfusion. The Workgroup discussed in great detail the reliability of historical blood type results. Historical information would be important to use as a reference, but clinical decisions should not be based on this information alone. It was agreed that there needs to be a current blood sample and that the protocol per OPTN Policy of drawing two blood samples is the common practice used for blood type testing.

The initial focus was on deceased donor policies; however, during the review of OPTN policies it was determined that changes should also be proposed for the candidate and living donor policies. These additional changes will provide consistency across deceased and living donor policies. It was also believed that the development of a comprehensive guidance document would be appropriate to help educate the community on additional methodologies and testing that could be considered when presented with indeterminate or conflicting blood typing results.

Purpose

Blood type determination is one of the most crucial components of the process for matching donor organs to transplant candidates. Failure to accurately identify blood type can have catastrophic consequences for organ transplant recipients receiving organs from a donor whose blood type has been determined or reported inaccurately. Thus, steps should be taken by members of the organ donation

¹ https://optn.transplant.hrsa.gov/media/1676/osc_boardreport_20141112.pdf

and transplantation community to educate themselves on the processes for blood type determination, the strengths and weaknesses of blood type testing methods, factors that can impact the reliability of blood typing, and steps that can be taken to evaluate and address those factors that impact blood typing reliability to mitigate risks to transplant candidates awaiting lifesaving gifts.

The purpose of the policy proposal is to increase patient safety by creating additional protocols and documentation requirements to address situations that could potentially affect the reliability of blood typing results. The guidance document serves as a resource to the transplant community that intends to increase patient safety and create awareness of the importance of addressing all issues that may affect the accuracy of blood type determination. The guidance document includes additional information on alternative methodologies and factors that should be considered when addressing indeterminate or conflicting blood typing results.

Proposal for Board Consideration

The Committee is proposing the following policy language modifications for blood type determination and reporting:

Indeterminate Blood Typing Results – Current OPTN policies include requirements for OPOs, transplant programs, and donor hospitals to develop and comply with written protocols for blood type determination and reporting. One of the requirements for the written protocols is to include a process for addressing conflicting primary and subtype results. The Committee is proposing the addition of “indeterminate” to the policy language since this type of result should also trigger the use of written protocols.

Documentation of Blood Products – The use of blood products can potentially affect blood typing results. The Committee is proposing that host OPOs be required to document all blood products that the donor received since admission to the donor hospital. The rationale for this change is that when OPOs document all blood products received by the donor since admission to the donor hospital, it creates an awareness that blood typing results could be affected, especially if the potential donor received a significant amount of blood products.

Requirements for Blood Samples – OPTN Policies 2.6.A (Deceased Donor Blood Type Determination), 3.3.A (Candidate Blood Type Determination), and 14.5.A (Living Donor Blood Type Determination) address the requirements for deceased donor and candidate blood samples, which include two separate blood draws collected at different times and submitted as separate samples. An additional requirement is that the results must indicate the same blood type. The Committee determined that these policy sections address the process for blood type determination and do not focus on the actual reporting of the results. The reporting of blood typing results is addressed in Policies 2.6.C (Reporting of Deceased Donor Blood Type and Subtype), 3.3.B (Reporting of Candidate Blood Type), and 14.5.C (Reporting of Living Donor Blood Type and Subtype). The Committee determined that the language requiring blood samples to “have results indicating the same blood type” would make it impossible for members to comply with the policies if there are conflicting or indeterminate results. Therefore, the Committee is proposing the removal of the language in all three sections of the policies.

Source Documentation and Test Results – The policies addressing the verification and reporting of blood typing results state that two qualified health care professionals must use blood type and subtype source

documentation to verify the blood type results. The Committee is recommending additional policy language to specify that “all known” blood type source documents be used to verify blood typing results. This provides an additional awareness of potential issues if there are inconsistencies noted in the source documents.

Candidate and Living Donor Requirements – The Committee initially focused on deceased donor policies; however, during the review of OPTN policies it was determined that changes should also be proposed for the candidate and living donor policies. These additional changes will provide consistency in OPTN policy. The policy changes addressed in this proposal address candidate and living donor blood type determination where applicable.

Guidance Document for Board Consideration

The Guidance Document presented for Board consideration includes additional information on alternative methodologies and factors that should be considered when addressing indeterminate or conflicting blood typing results. It provides guidance on the following seven topics:

- Conventional Methods for ABO Determination
- Factors Impacting ABO typing Reliability
- Acceptable ABO and Transfusion Sources
- Alternative (new) methods for determinate of ABO – DNA based Determination of ABO
- Triggers for when to use Alternative Methods
- Practices to Resolve Donor ABO typing Conflicts
- Appendix: DNA based Determination of ABO

Public Comment Sentiment and Themes

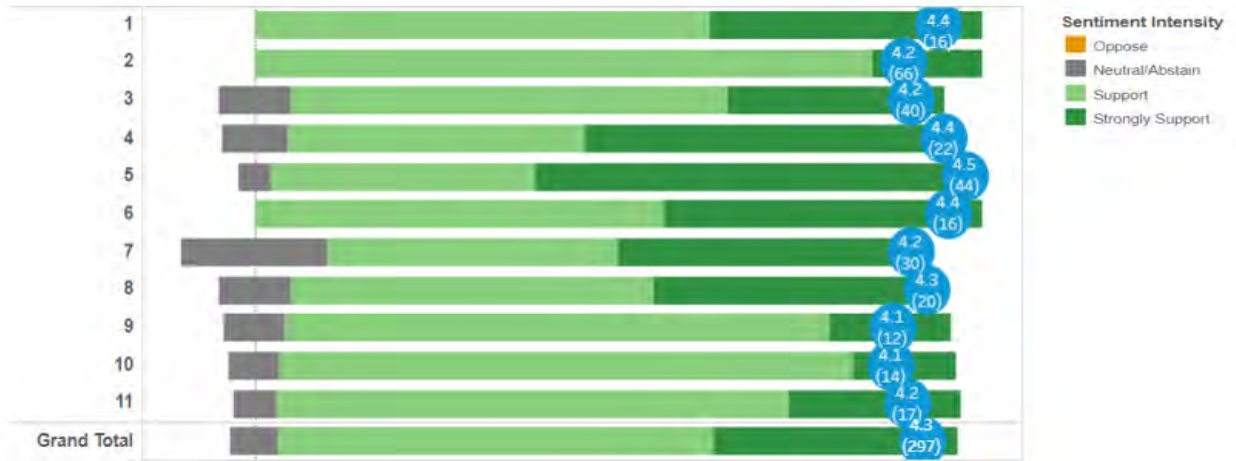
Overall, both the guidance and policy proposal were supported throughout the community during the OPTN public comment period from January 22, 2020 - March 24, 2020. The feedback received were in support with some comments centered on the logistical aspects of the methodologies presented in the documents.

Sentiment Among OPTN Regions

Both the proposal and guidance document were on the consent agenda for the OPTN regional meetings. The consent agenda included five public comment documents that were voted in a block. The regions had the opportunity to request any of the consent agenda documents to be discussed and voted on individually. None of the eleven regions made this request. Overall, there was support of the proposal and guidance document among the eleven regions.

Figure 1. Regional Sentiment at OPTN Spring 2020 Regional Meetings, illustrates the consent agenda block vote results of the OPTN regional meetings.

Figure 1: Regional Sentiment at OPTN Spring 2020 Regional Meetings²

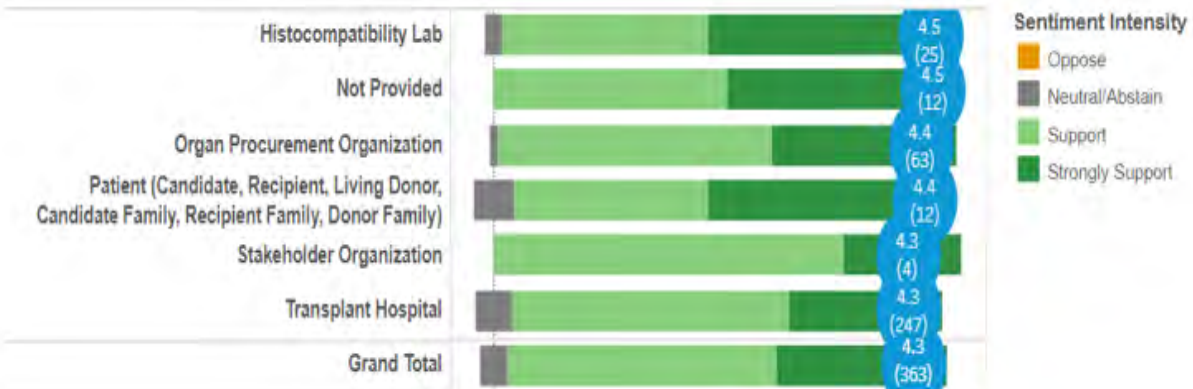


Sentiment Among Different Member Types

There was overall support among all member types during the OPTN Spring 2020 Public Comment period that included patients, stakeholder organizations, histocompatibility labs, and the general public.

Figure 2. Proposal Sentiment by Member Type and **Figure 3. Guidance Document Sentiment by Member Type**, illustrate the sentiment by member type of the policy proposal and guidance document respectively.

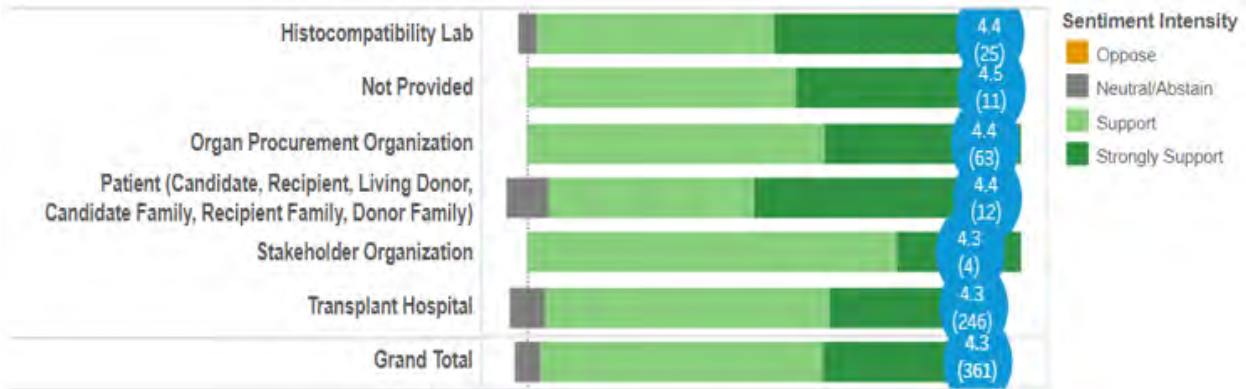
Figure 2: Proposal Sentiment by Member Type³



² This chart shows the sentiment for the public comment proposal. Sentiment is reported by the participant using a 5-point Likert scale (1-5 representing Strongly Oppose to Strongly Support). Sentiment for regional meetings only includes attendees at that regional meeting. Region 6 uses the average score for each institution. The circles after each bar indicate the average sentiment score and the number of participants is in the parentheses.

³ This chart shows the sentiment for the public comment proposal. Sentiment is reported by the participant using a 5-point Likert scale (1-5 representing Strongly Oppose to Strongly Support). Sentiment by member type includes all comments regardless of source (regional meeting, committee meeting, online, fax, etc.) The circles after each bar indicate the average sentiment score and the number of participants is in the parentheses.

Figure 3: Guidance Document Sentiment by Member Type⁴



Sentiment Among OPTN Committees

During the OPTN Spring 2020 Public Comment period, leadership of the Committee presented the proposal to the following OPTN Committees: Histocompatibility Committee, Transplant Coordinators Committee (TCC), Membership and Professional Standards Committee (MPSC), and the Living Donor Committee. All Committees were in support of the guidance document and policy proposal. In addition to the sentiment received from the OPTN Committees as previously mentioned, the proposed policy language and guidance document garnered feedback from professional societies including:

- American Society for Histocompatibility and Immunogenetics (ASHI)
- American Nephrology Nurses Association (ANNA)
- NATCO
- American Society of Transplant Surgeons (ASTS)
- American Society of Transplantation (AST)
- Association of Organ Procurement Organization (AOPO)

All societies were in support of the both the guidance document and policy proposal. The common themes of the comments received are detailed below:

Themes in Public Comment

Lack of resources among Histocompatibility Labs

The OPTN Histocompatibility Committee commented that a number of the testing methodologies presented in the guidance document requires additional expertise and carries additional CLIA requirements. Resources among histocompatibility labs vary throughout the country.

The Committee acknowledged the variation in resources available among labs which may results in limitations to the different methodologies mentioned in the guidance document. The intent of the

⁴ This chart shows the sentiment for the public comment proposal. Sentiment is reported by the participant using a 5-point Likert scale (1-5 representing Strongly Oppose to Strongly Support). Sentiment by member type includes all comments regardless of source (regional meeting, committee meeting, online, fax, etc.) The circles after each bar indicate the average sentiment score and the number of participants is in the parentheses.

guidance document is to provide information of the various tools that are available and can be considered in the case that additional testing methods are needed to help address indeterminate blood type results.

Addressing Changes to Site Survey Process

The OPTN Transplant Coordinators Committee (TCC) were highly supportive of the policy proposal but voiced concern of potential changes to the site survey process. Currently, the site survey evaluation process includes a review of the OPO's internal policies, procedures, and protocols to verify that it has a written protocol that includes all requirements as outlined in OPTN policy.⁵

The Committee acknowledged that the policy modifications would require OPOs to update their written protocols to address both indeterminate and conflicting blood typing results. Site surveyors will continue to verify that OPOs, recovery hospitals, and transplant hospitals have written protocols for blood type determination of deceased donors, living donors, and candidates, respectively, and they will verify that the protocols include a process for resolving both conflicting and indeterminate primary blood types.

Consideration in requiring patient safety reporting

The Membership and Professional Standards Committee (MPSC) suggested that the Committee consider requiring patient safety event reporting of indeterminate blood typing results in order to track trends and gain a better understanding of these events.

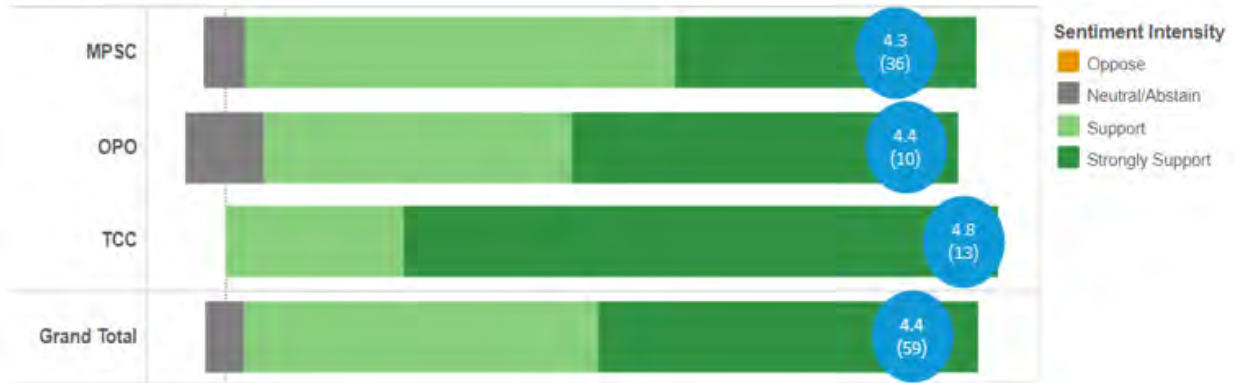
The Association of Organ Procurement Organizations (AOPO) provided similar feedback by suggesting a data field that would allow discrepant or conflicting blood type results being captured or reported. This would allow the opportunity to evaluate how frequently these circumstances occur. Additionally, AOPO suggested that Organ Procurement Organizations (OPOs) should be documenting all blood products the donor received in the field prior to hospital admission or at a different hospital prior to transfer to the donor hospital.

The Committee discussed a need to track these patient safety events to better understand the occurrence of these events. Although this is beyond the purview of what the Committee wished to address in the modifications of this policy proposal, the Committee believes that this could be considered as a future programming endeavor of how to effectively collect and track this information.

Figure 4. Proposed Sentiment by OPTN Committees, illustrates the sentiment among OPTN Committees. This chart shows the sentiment for the public comment proposal. Sentiment is reported by the participant using a 5-point Likert scale (1-5 representing Strongly Oppose to Strongly Support). Sentiment for committees only includes attendees at that committee meeting. The circles after each bar indicate the average sentiment score and the number of participants is in the parentheses.

⁵ https://optn.transplant.hrsa.gov/media/1202/evaluation_plan.pdf

Figure 4: Proposal Sentiment by OPTN Committee⁶



During their March 26, 2020 teleconference meeting, the Committee reviewed the responses received during public comment and determined that no changes were required to the guidance document or policy proposal and voted unanimously in support of both documents as written for OPTN Board of Directors review.

Authority under the OPTN Final Rule

The Committee submits the following proposal for the Board consideration under the authority of the OPTN Final Rule, which states “An OPTN member procuring an organ shall assure that laboratory tests and clinical examinations of potential organ donors are performed to determine any contraindications for donor acceptance, in accordance with policies established by the OPTN.”⁷

Due to recent patient safety events, the Committee established additional requirements for accepting lab tests in circumstances where blood type results are indeterminate and/or conflicting. This is to promote living donor and transplant recipient safety.

Alignment with OPTN Strategic Plan⁸

1. *Promote living donor and transplant recipient safety:* This policy proposal promotes living donor and transplant recipient safety by creating awareness of indeterminate results and the importance of addressing all issues that may affect the accuracy of blood type determination.

⁶ This chart shows the sentiment for the public comment proposal. Sentiment is reported by the participant using a 5-point Likert scale (1-5 representing Strongly Oppose to Strongly Support). Sentiment for committees only includes attendees at that committee meeting. The circles after each bar indicate the average sentiment score and the number of participants is in the parentheses.

⁷ CFR §121.6(a).

⁸ For more information on the goals of the OPTN Strategic Plan, visit <https://optn.transplant.hrsa.gov/governance/strategic-plan/>.

Implementation Considerations

Member and OPTN Operations

UNOS will notify members of the policy changes included in this proposal, and the implementation date of these changes, through a Policy Notice. This proposal will not require programming.

Operations affecting Organ Procurement Organizations

OPOs will need to update their written protocols to address both indeterminate and conflicting blood typing results. OPOs will need to document that blood type determination was conducted according to the written protocols. Finally, OPOs will need to document all blood products received by the donor since admission to the donor hospital.

OPOs will need to train their staff on how to address both indeterminate and conflicting results as outlined in their written protocols.

Operations affecting Transplant Hospitals

Transplant programs will need to update their written protocols to address both indeterminate and conflicting blood typing results for candidates and living donors.

Transplant programs will need to train their staff on how to address both indeterminate and conflicting results as outlined in their written protocols.

Projected Fiscal Impact

Policy and Community Relations (PCR) conducted a workgroup to review and develop a guidance document and policy proposal which included meetings, policy development, writing, and outreach. In addition, Member Quality worked closely with the PCR team to consult in internal and committee meetings.

Implementation for Member Quality includes educating staff and updating monitoring tools. The proposal makes minimal changes to policy that is monitored via site surveys and so no anticipated increase in monitoring effort is expected. Neither the guidance document or policy proposal will require programming or educational efforts.

Projected Impact on Histocompatibility Laboratories

There is minimal impact to histocompatibility laboratories for additional infrequent testing.

Projected Impact on Organ Procurement Organizations and Transplant Hospitals

OPOs implementation cost may include minor programming changes to allow for records of additional donor testing. Transportation of additional testing specimens to labs may also be necessary.

Staff training on changes and center specific procedure or protocol will be necessary. This proposal does not change the process for confirming ABO blood type in donors and candidates in the event of discrepant or indeterminate results. If additional testing is required, these additional tests could cost

between \$200-400 per test, which could be included in reimbursable payer items as part of transplant care. While overall current volume or center effort level to resolve discrepancies is unclear, the cost will be minimal if occurrence of discrepancy is infrequent.

The Committee suggest that any cost to transplant programs or OPOs would be worthwhile in order to prevent failed transplants and recipient harm.

The time and cost to implement these changes at transplant centers and OPOs are expected to be minimal.

Projected Impact on the OPTN

This proposal is not anticipated to have any fiscal impact on the OPTN.

Post-implementation Monitoring of the Policy

Member Compliance

Members will be expected to comply with the requirements in the proposed policy. Site surveyors will continue to verify that OPOs, recovery hospitals, and transplant hospitals have written protocols for blood type determination of deceased donors, living donors, and candidates, respectively, and they will verify that the protocols include a process for resolving both conflicting and indeterminate primary blood types. Site surveyors will also continue to verify that OPOs and recovery hospitals have written protocols for blood subtype determination of deceased and living donors, respectively, and they will verify the protocols include only reporting primary blood type to the OPTN Contractor when the subtyping results conflict or are indeterminate.

Policy Evaluation

This policy will be formally evaluated approximately 6 months, 1 year, and 2 years post-implementation. The following metrics, and any subsequently requested by the Committee, will be evaluated as data become available. Appropriate lags will be applied, per typical OPTN conventions, to account for time delay in institutions reporting data to UNetsm (e.g., TIEDI forms may take 60+ days to be submitted). Metrics will be compared to an appropriate pre-policy cohort to assess performance before and after implementation of this policy:

- For all deceased donors, has the proportion with AB blood type increased?
- For deceased donors with over 10 transfusions during their terminal hospitalization, has the proportion of with AB blood type increased?
- How do the blood type distributions compare for deceased donors with no transfusions during their terminal hospitalization versus those with over 10 transfusions?
- Are there any reported patient safety events that are relevant to the policy?

Conclusion

Accurate determination, reporting, and verification of blood type is necessary to ensure that the organ intended for the recipient is going to be compatible. Patient safety should be considered during all aspects of the organ donation and transplant process. Failure to accurately identify blood type can lead to adverse events, such as graft failure or patient death. This proposal is part of an effort by the

Operations and Safety Committee to create awareness of the importance of addressing all issues that might affect the accuracy of blood type determination. These policy changes, as well as the guidance document, will further educate the community and provide awareness of the importance of accurate blood type determination.

Policy Language

Proposed new language is underlined (example) and language that is proposed for removal is struck through (~~example~~). Heading numbers, table and figure captions, and cross-references affected by the numbering of these policies will be updated as necessary.

2.6 Deceased Donor Blood Type Determination and Reporting

Host OPOs must develop and comply with a written protocol for blood type determination and reporting that includes *all* of the requirements below:

2.6.A Deceased Donor Blood Type Determination

The host OPO must ensure that each deceased donor's blood type is determined by testing at least two donor blood samples prior to the match run. ~~The host OPO must include a process to address conflicting primary blood type results in their written protocol.~~

The ~~D~~ deceased donor blood samples must:

1. Be drawn on two separate occasions
2. Have different collection times
3. Be submitted as separate samples
4. ~~Have results indicating the same blood type~~

The host OPO must include a process to address conflicting or indeterminate primary blood type results in their written protocol.

~~The host OPO must document that blood type determination was conducted according to the OPO's protocol and the above requirements.~~

The host OPO must document:

1. That blood type determination was conducted according to the OPO's written protocol and
2. A complete history of all blood products the deceased donor received since admission to the donor hospital in the deceased donor medical record.

2.6.B Deceased Donor Blood Subtype Determination

Deceased donor blood subtyping must be completed according to the *Table 2-1* and the requirements below.

Table 2-1: Subtyping Requirements by Primary Blood Type and First Subtype Result

If the donor's primary blood type is:	Then subtyping is	A second subtyping must be completed if the first subtype result is:
A	Required	Blood type A, non-A ₁
AB	Optional	Blood type AB, non-A ₁ B

35 Deceased donor blood samples for subtyping must:

- 36 1. Be tested using pre-red blood cell transfusion samples
 37 2. Be drawn on two separate occasions
 38 3. Have different collection times
 39 4. Be submitted as separate samples
 40

41 All subtype results reported to the OPTN Contractor must be from two separate tests
 42 indicating the same result. If there are conflicting or indeterminate subtype results, the
 43 subtype results must not be reported to the OPTN Contractor and the deceased donor
 44 must be allocated based on the primary blood type.

45 For all blood type A donors, the host OPO must document *either* that subtyping was
 46 completed or the reason it could not be completed.

47 **2.6.C Reporting of Deceased Donor Blood Type and Subtype**

48 The deceased donor is not eligible for a match run until the host OPO completes verification
 49 and reporting as follows:

- 50 1. Two different qualified health care professionals, as defined in the host OPO's
 51 protocol, must each make an independent report of the donor's blood type to the
 52 OPTN Contractor.
 53 2. If the donor's blood subtype will be used for allocation, a qualified health care
 54 professional must report the subtype to the OPTN Contractor. This report must be
 55 verified by a different qualified health care professional according to the OPO's
 56 protocol.
 57 3. Both qualified health care professionals must use all known available blood type and
 58 subtype determination source documents to verify they:
 59 a. Contain blood type and subtype (if used for allocation) results for the donor
 60 b. Indicate the same blood type and subtype (if used for allocation) on the ~~two~~ test
 61 results. If the results are conflicting or indeterminate, the host OPO must refer to
 62 their written protocol as outlined in *Policy 2.6.A: Deceased Donor Blood Type*
 63 *Determination.*
 64 c. Match the result reported to the OPTN Contractor
 65 1.

66 The OPO must document that reporting was completed according to the OPO's protocol
 67 and the above requirements.

68 If donation must be accelerated to avoid organ waste, the host OPO may instead
 69 complete these requirements after the match run, but prior to organ release to a
 70 transplant hospital. The host OPO must document *all* of the following:

- 71 1. The reason that both blood type tests (and subtype tests, if used for allocation) could
 72 not be completed, verified, and reported prior to the match run.
 73 2. If there are conflicting or indeterminate primary blood type test results, the host OPO
 74 must follow its protocol for resolving the discrepancy and must re-execute the match
 75 run if the final ABO result is different from the initial ABO on the original match run.
 76 3. That all required blood type and subtype determinations, verification, and
 77 reporting were completed prior to organ release to a transplant hospital.

78 3.3 Candidate Blood Type Determination and Reporting 79 before Waiting List Registration

80 Transplant programs must develop and comply with a written protocol for blood type
81 determination and reporting that includes *all* of the requirements below.

82 83 3.3.A Candidate Blood Type Determination

84 The transplant program must ensure that each candidate's blood type is determined
85 by testing at least two candidate blood samples prior to registration on the waiting
86 list. ~~The transplant program must develop and comply with a written protocol to
87 resolve conflicting primary blood type results.~~

88
89 Candidate blood samples must:

- 90
- 91 1. Be drawn on two separate occasions
- 92 2. Have different collection times
- 93 3. Be submitted as separate samples
- 94 4. ~~Have results indicating the same blood type~~

95
96 The transplant program must include a process to address conflicting or
97 indeterminate primary blood type results in their written protocol.

98
99 The transplant program must document that blood type determination was
100 conducted according to the program's protocol and the above requirements.

101 102 3.3.B Reporting of Candidate Blood Type

103 The candidate is not eligible to appear on a match run until the transplant program
104 completes verification and reporting as follows:

- 105 1. Two different qualified health care professionals, as defined in the transplant
106 program's protocol, must each make an independent report of the candidate's
107 blood type to the OPTN Contractor
- 108 2. Both qualified health care professionals must use all known available blood
109 type determination source documents to verify they:
 - 110 a. Contain blood type results for the candidate
 - 111 b. Indicate the same blood type on the ~~two~~ test results. If the results are conflicting or
112 indeterminate, the transplant program must refer to their written protocol as
113 outlined in *Policy 3.3.A: Candidate Blood Type Determination*.
 - 114 c. Match the result reported to the OPTN Contractor

115
116 The transplant program must document that reporting was completed
117 according to the program's protocol and the above requirements.

118 119 14.5 Living Donor Blood Type Determination and Reporting

120 Recovery hospitals must develop and comply with a written protocol for blood type

121 determination and reporting that includes all of the requirements below.

122

123 **14.5.A Living Donor Blood Type Determination**

124 The recovery hospital must ensure that each living donor’s blood type is determined
 125 by testing at least two donor blood samples prior to generation of the living donor ID.
 126 ~~The recovery hospital must develop and comply with a written protocol to resolve~~
 127 ~~conflicting primary blood type results.~~

128

129 Living donor blood samples must:

130

- 131 1. Be drawn on two separate occasions
- 132 2. Have different collection times
- 133 3. Be submitted as separate samples
- 134 4. ~~Have results indicating the same blood type~~

135

136 The recovery hospital must include a process to address conflicting or indeterminate primary
 137 blood type results in their written protocol.

138

139 The recovery hospital must document that blood type determination was conducted
 140 according to the hospital’s protocol and the above requirements.

141

142 **14.5.B Living Donor Blood Subtype Determination**

143 Subtyping is optional for living donors.

144

145 If the recovery hospital chooses to subtype *and* pre-red blood cell transfusion
 146 samples are available, then subtyping must be completed according to *Table 14-*
 147 *9*.

148

149

Table 14-9: Subtyping Requirements by First Subtype Result

If the donor’s primary blood type is:	A second subtyping must be completed if the first subtype result is:
A	Blood type A, non-A ₁
AB	Blood type AB, non-A ₁ B

150

151 Living donor blood samples for subtyping must:

152

- 153 1. Be tested using pre-red blood cell transfusion samples
- 154 2. Be drawn on two separate occasions
- 155 3. Have different collection times
- 156 4. Be submitted as separate samples

157

158 All subtype results reported to the OPTN Contractor must be from two separate tests
 159 indicating the same result. If there are conflicting or indeterminate subtype results,

160 the subtype results must not be reported to the OPTN Contractor and living donor
161 transplant compatibility or allocation must be based on the primary blood type.

162 If subtype is determined and reported, the recovery hospital must document that
163 subtyping was conducted according to the above requirements.

164

165 **14.5.C Reporting of Living Donor Blood Type and Subtype**

166 The recovery hospital must report and verify the living donor blood type prior to
167 registration with the OPTN Contractor using the *Living Donor Feedback Form* as
168 required below:

169

- 170 1. Two different qualified health care professionals, as defined in the recovery
171 hospital's protocol, must each make an independent report to the OPTN
172 Contractor for blood type. For VCA recoveries, the blood type verification and
173 reporting must be recorded in the living donor's medical record.
- 174 2. If blood subtype is used for ensuring transplant compatibility or allocation, a
175 qualified health care professional must report blood subtype to the OPTN
176 Contractor. This report must be verified by a different qualified health care
177 professional according to the recovery hospital's protocol. For VCA recoveries, the
178 blood subtype verification and reporting must be recorded in the living donor's
179 medical record.
- 180 3. Both qualified health care professionals must use all known available blood type
181 and subtype determination source documents to verify they:
 - 182 a. Contain blood type and subtype (if used for ensuring transplant
183 compatibility or allocation) results for the donor
 - 184 b. Indicate the same blood type and subtype (if used for ensuring transplant
185 compatibility or allocation) on the ~~two~~ test results. If the results are
186 conflicting or indeterminate, the recovery hospital must refer to their written
187 protocol as outlined in *Policy 14.5.A: Living Donor Blood Type Determination*.
 - 188 c. Match the result reported to the OPTN Contractor or VCA donor medical record

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190 The recovery hospital must document that reporting was completed according to the
191 hospital's protocol and the above requirements.

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Guidance on Blood Type Determination

Conventional Methods for ABO determination

ABO blood type testing is generally performed using one of three methodologies: tube, gel, or solid phase. Tube methodology is a manual method using separate test tubes for each reaction. Gel column agglutination methodology uses gel or glass beads. Red blood cells and antibodies are combined in microtubes filled with gel matrix, then centrifuged to force the red blood cells through the column. Agglutinated (or clumped) cells remain trapped at the top of the gel column, while non-agglutinated cells travel through to the bottom. In solid phase methodology, A and B antigens or antibodies are adherent to microtiter wells, and red blood cells or serum is added. After washing, indicator red blood cells coated with anti-Immunoglobulin G (IgG) are then added to determine if agglutination occurred. Various platforms have been developed for automation or semi-automation of gel and solid phase methods.

For each of these methodologies, ABO blood group is determined by performing both a forward and reverse blood type. The blood sample is first centrifuged to separate the red blood cells from the plasma or serum. For the forward blood type, red blood cells are combined with reagent anti-A, anti-B, and anti-D antibodies in three reactions to determine the presence of ABO and RhD antigens. The reverse blood type uses the patient's plasma or serum, combined with reagent group A and group B red blood cells, to determine which ABO antibodies are present.

The forward and reverse blood type results should be consistent in order to report the final blood type. If there is a discrepancy between the forward and reverse blood type results, the cause of the discrepancy should be determined prior to reporting a blood type. If the discrepancy cannot be resolved, most transfusion services will treat the patient as blood type O for transfusion purposes until the correct blood type can be determined.

Factors Impacting Blood Typing Reliability

Several clinical situations may result in unreliable serologic blood typing which can lead to mixed field reactions or discordances in the forward and reverse blood typing.

1. **Transfusion:** Patients who receive type O transfusions in emergency situations will often develop a mixed field or discordant typing. Forward typing (patient RBC mixed with commercially available antibody) will be mixed field or non-agglutinated due to the transfused type O red cells, whereas reverse typing (patient plasma mixed with commercially available reagent RBCs) will detect the patient's native anti-A or anti-B antibodies, leading to discordant or indeterminate reports.

Although case reports have described transfusion impacting a patient's blood type on a temporary basis, there is no information in the literature regarding a time frame post transfusion in which there could be certainty that the blood type results are reliable and no longer impacted by the transfused cells.

2. **ABO Non-identical Stem Cell Transplant:** Patients who have received stem cells from a donor with a different blood type will display a mixed blood type until full engraftment occurs. After engraftment, they will display a different blood type in circulating whole blood from that of the organ allografts.

Organ donors who have previously received stem cell transplants should be given careful consideration. This information needs to be considered by the OPO medical director and histocompatibility lab. Peripheral blood is typically used for tissue typing on a deceased donor, but in these patients who are prior recipients of stem cells, buccal swabs or lymph nodes need to be utilized to determine both blood type and Human leukocyte antigen (HLA) since the organs and tissues will be incongruent from circulating blood.

3. **Infections and Cancers:** While uncommon, some patients develop an “acquired B” phenomenon as a result of a bacterial infection or malignancy. The underlying infection can cause enzymatic alteration of the group A antigen on cells, and can result in the formation of a “B-like” antigen and discrepant blood type testing. This has been described in patients with specific *Escherichia coli* infections as well as in patients with malignancies of the stomach and intestine.² In addition, neonates with Necrotizing Enterocolitis due to *Klebsiella pneumonia* have been inadvertently assigned as blood type B due to the “acquired B” phenomenon.³ It should also be noted that detection of acquired B is dependent on the anti-B clone used and reagent pH.
4. **Elevated Globulin Levels:** Patients with multiple myeloma, amyloidosis, hyperfibrinogenemia, Waldenstrom macroglobulinemia, plasma cell disorders or those who receive plasma expanders, such as dextran, may display a protein to plasma abnormality. This can lead to rouleaux formation and false appearance of agglutination on forward typing that may be inconsistent with reverse typing.⁴
5. **A_{weak}, B_{weak}, and Blood Type Subgroups:** Antigen expression can become so weak that it is not detected by forward typing, with no natural antibodies present on the reverse reaction. In addition, some subgroups may not express some forms of the blood type red blood cell (RBC) antigens, which can cause discordant forward and reverse patterns. For example, patients with type A₂ may possess anti-A₁ antibody (estimated in 1-8% of A₂ individuals and 22-35% of AB individuals)⁵, which would render the reverse typing discordant from forward typing. Such patients would display forward type of A, but reverse type of O in the event that antibodies to A₁ are present in the type A₂ patient.⁶
6. **Age:** Patients that are very young or elderly may have weakly reacting antibodies, or missing antibodies that renders the blood typing incongruent.

It is well described that while newborns express A and B blood type antigens, which would be detectable on forward typing, they do not produce antibody to blood types until 3-6 months of age. Until this age, the blood type antibodies present are maternal from placental transfer.⁷ Newborns should only be typed using forward typing, as reverse typing may result in discordant or unreliable results. If a newborn has received any type O transfusion, extreme caution should be exercised with regard to organ donation, as the newborn can be incorrectly typed as O using forward typing only.

Similarly, elderly patients may not possess enough antibody for reliable reverse typing, resulting in discordance. In one study, a 66 year old otherwise healthy patient was deemed to be type O on forward typing, but did not show anti-A or anti-B on reverse typing until the amount of serum utilized in the testing was doubled.⁸ This would result in a discordant forward type O and reverse type A, B, or AB.

7. **Immunosuppression:** Patients severely immunocompromised, due to disease, therapy, or depressed immunoglobulin levels may not mount an appropriate amount of antibody to reliably perform reverse typing, for the same physiologic reasons mentioned above.⁹

Acceptable Blood Type and Transfusion Sources

OPOs rely on a number of potential sources for donor blood type testing. Commonly these may be the donor hospital blood bank, the OPOs contracted infectious disease laboratory and/or the OPOs tissue typing laboratory. OPTN Policy requires at least two sources of ABO type from donor samples drawn at separate times and ideally these samples would be obtained prior to transfusions which may impact blood typing results. If a potential donor was treated at another hospital prior to transfer to the donor hospital or recovery center that originating hospital may have pre-transfusion samples available for testing.

All known and available blood type results of the donor should be reviewed to ensure there are no conflicting results. To have, for example, two recent blood typing results that are in conflict with a historic blood type from a previous hospital admission should call into question the reliability of blood typing results and action must be taken to resolve this conflict.

Though historical blood typing results may be available from past hospitalizations these results may be used only as a means of confirming blood typing performed during the donor's current admission course rather than as a primary source of the donor's blood type. The best source of ABO typing by blood sample is ideally a sample obtained prior to the donor receiving blood transfusions.

As referred above in the section titled "*Conventional Methods for Blood Type Determination*", donor blood typing determination performed by hospital blood banks considers the perspective of the patient as a blood product recipient. Thus, if there are discrepant forward and reverse blood typing results the blood bank may err on the side of assigning the result as blood type O to ensure the patient would receive blood type compatible O blood transfusions. This of course creates a concern if that patient then becomes an organ donor and the reliability of donor blood type may be in question.

When considering the reliability of blood type results transfusion history must be considered as it can impact the reliability of such testing. It is important for OPOs to consider what blood products the donor may have received in all phases of the admission course, including pre-hospital or any other hospitals where the patient may have been treated prior to a transfer to the donor hospital or recovery center.

Alternative (new) Testing Methods for Determination of Blood Type: DNA-based Determination of Blood Type

Since the early 1900s, blood typing has been performed by serological methodology.¹⁰ This has consisted of a forward and reverse typing which together are evaluated and must agree to give a valid blood type phenotype. However, when patients have been transfused out of their own blood type, or discrepancies between the forward and reverse typing or mixed field typing is seen, DNA based testing may be considered.

Advances in technology allow for blood type genotyping using molecular methods. These include:

- Sanger sequencing
- Polymerase chain reaction (PCR) with restriction fragment length polymorphism analysis (PCR-RFLP)¹¹
- PCR using sequence-specific primers (PCR-SSP)¹²
- Real-time quantitative PCR¹³

- High density DNA arrays¹⁴
- Next generation sequencing (NGS)¹⁵⁻²³

All of the above genotyping methods originated under research protocols as research use only (RUO) and have been implemented for clinical testing in a small number of large reference labs as laboratory in house developed assays (LDT) evaluated in concert with serologic reactivity of the sample. This has limited the number of labs capable of performing ABO genotyping. However, recent vendor supplied kits have been developed for blood type genotyping using PCR-SSP, real-time PCR, and targeted NGS. Importantly, all of these vendor supplied kits use techniques and instruments already employed by most tissue typing labs. As such, the PCR-SSP and real-time PCR methods are of particular importance for deceased donor testing, since they can be done within the required time constraints. Of these, real-time PCR is the most attractive method for deceased donors since it has a streamlined assay setup and the PCR products are detected by the instrumentation allowing for automated interpretation by vendor supplied software. Real-time blood type genotyping could be routinely performed alongside existing histocompatibility typing lab workflows on deceased donors to resolve serologic forward and reverse blood typing discordances, help interpret mixed-field reactions, and when evaluated with serologic blood typing by subject matter experts can resolve the inherited blood type, especially in situations of massive red blood cell transfusion.

Further information can be found in the appendix.

Triggers for When to Use Alternative Methods

In those circumstances where blood typing results may be in question OPOs should perform a thorough review of all results, including the specific forward and reverse typing results, to ensure there are no discrepancies or unreliable results.

Certainly in situations where there are conflicting donor blood typing results OPOs are required to have written protocols in place to attempt to resolve the conflicting results.

More importantly, in the circumstances where a donor has received blood products prior to the availability of required samples for donor blood typing, the potential impact on post-transfusion results should be considered.

In any circumstances where there are blood typing results received by the OPO that are “Indeterminate” due to conflicting forward and reverse blood typing, all results should be reviewed. These results should be viewed in conjunction with transfusion history, donor medical history and admission course for factors that may have led to an indeterminate result which then may call into question other results received.

Practices to Resolve Donor Blood Type Conflicts

There are a variety of practices employed by OPOs to resolve conflicting or indeterminate donor blood typing results.

Resolution of indeterminate results may be achieved with a review of donor transfusion history and review of blood type forward and reverse typing results. In some scenarios a donor may express blood type O by forward typing and a different blood type by reverse typing when the donor has received uncrossmatched blood type O transfusions which can convolute the forward typing result.

For example, if a donor receives massive transfusions of blood type O packed red blood cells (PRBCs), then blood type forward-typing indicates blood type O with reverse-typing indicating blood type A, it is likely the blood type O blood transfusions have affected the forward typing by reflecting the blood type of the transfused PRBCs. In such a scenario, the safest course of action is to conclude the donor is blood type A. Concluding that the donor is blood type O in error would potentially expose transplant candidates to organs that are incompatible for transplant. By concluding the donor is blood type A in this scenario (subtyping in this scenario would not be an option) then all candidates matched to the donor would be ABO type A or AB (or Platelet Transfusion Refractory (PTRs) listed as accepting organs of incompatible blood type as allowed by policy).

It is best in such scenarios to consult with blood banking physicians and scientist experts to review the entirety of the circumstances, donor medical history, transfusion history and blood type results to ensure the safest course is followed when the final determination of donor blood type is made. If there is doubt about the conclusions of donor blood typing, extreme caution should be exercised to avoid the possibility of exposing candidates to such risk.

Conflicting blood typing results are certainly the more concerning scenarios OPOs may face. In the event the donor blood typing by one lab or blood draw time is conclusive but conflicting with the conclusive results of another lab result or result on a donor blood sample drawn at a different time, the OPO should review of donor transfusion history and review of all forward and reverse blood type results obtained to determine the source of the conflict. The reliability of the blood sample source must also be called into question in such a scenario. OPO Medical Directors and Blood Bank Experts should be consulted to investigate the source of the potential error.

OPTN policy requires that blood type be determined using two blood samples drawn at separate times. The purpose of this requirement is to confirm blood type determination and ensure that samples have been drawn from the correct patient to prevent conflict that may have occurred due to possible sample labeling error.

Some OPOs have employed policies to re-draw donor blood samples after an interval of time has passed and have the samples re-tested for blood type. While this may resolve some conflicts it may not always be a reliable means since no criteria is known for determination of when a donor would revert to their natural blood type. Re-testing may result in further conflict or such a practice may result in blood type results that are no longer in conflict and enable more confidence in the original result.

The utilization of alternative (new) testing methods for determination of blood type DNA-based determination of blood type as described above could be an adjunct in efforts to resolve conflicting, discrepant or indeterminate blood type results.

As a last resort, when donor blood typing results remain in conflict and unable to be resolved, the safest course of action is to consider the donor to be blood type AB to ensure that only AB blood type candidates, as universally ABO compatible recipients, would be considered to receive the organs from that donor. This does however carry the consequence that urgently ill candidates in need of a lifesaving transplant may be excluded from consideration of the organs in such a scenario.

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Appendix

DNA-Based Determination of ABO

When the ABO gene was cloned in 1990, it was found that the genes for A and B glycotransferase enzymes differ by four single nucleotide polymorphisms (SNPs) in exon 7, designated according to the cDNA sequence as c.562C/G (p.176Arg/Gly), c.703G/A (p.235Gly/Ser), c.796C/A (p.266Leu/Met), and c.803G/C (p.268Gly/Ala). Group O, representing loss of transferase activity, most often resulted from a nucleotide deletion in exon 6, c.261delG (p.Thr88Profs*31), although a number of other genetic backgrounds have been reported.²⁴ To date, several hundred different ABO allele sequences have been catalogued by the International Society of Blood Transfusions (ISBT) Red Cell Immunogenetics and Blood Group Terminology working party, however this is not a comprehensive list and new alleles are still being discovered primarily associated with weaker than expected antigen expression (i.e. A and B subgroups) that can cause serologic typing discrepancies between forward and reverse ABO typing.²⁵ The ABO subtypes (e.g. A₂, A_{weak}, A_x, B₃, B_{weak}) are associated with genetic changes elsewhere in the coding, or less often regulatory, region of the ABO gene. Importantly, although numerous A and B alleles have been defined, the original four SNPs are the essential differences that distinguish the A and B phenotypes. Group O is most often associated with homozygosity for the nucleotide deletion in exon 6, c.261delG, although to date, at least 15 other genetic changes have been found to cause an O phenotype.²⁶ Methodologies for ABO genotyping target the A and B exon 7 SNPs along with one or more of the known O genetic changes. Some of the assays also include the more common A₂ subtype.

ABO genotyping by exon specific amplification and Sanger sequencing allows for unbiased evaluation of the ABO gene, enabling detection of rare and novel ABO genetic changes, although Sanger sequencing is unable to define the cis/trans haplotype phase of heterozygous changes. This can be overcome by using primers specific to A, B, or O alleles to amplify the target or in the sequencing reaction. For routine clinical sequencing, Sanger sequencing is performed for ABO exons 6 and 7, and when serologic reactivity suggests the presence of a subgroup phenotype as the basis for a discrepant forward and reverse type, the remainder of the gene is sequenced including promoter regions located upstream of the ABO gene within intron 1 associated with weakly expressed ABO subtypes.^{27,28} Sanger sequencing is not scalable for testing large number of samples and the results require interpretation by subject matter experts.

One of the first ABO genotyping assays was based on polymerase chain reaction (PCR) amplification of ABO exons 6 and 7 followed by restriction fragment length polymorphism analysis (PCR-RFLP).²⁹ Since this PCR-RFLP assay can distinguish between A, B, and the two most common O genetic backgrounds it is still used by reference labs as an initial assay in ABO genotyping workups (only two American Association of Blood Banks (AABB) accredited reference laboratories in the United States do ABO genotyping) as RUO LDT testing. The PCR-RFLP assay requires subject matter expert interpretation of the restriction enzyme digestion patterns.

ABO genotyping methods targeting multiple SNPs have proven to be scalable, and reliable. For example, allele specific PCR using sequence-specific primers (PCR-SSP) have been developed to determine ABO genotype using by targeting the key ABO genetic changes.²⁸ These PCR based methods have also been extended to use real-time quantitative PCR to simplify detection and allow for automated software based interpretation.³⁰ One benefit of PCR based methods is that allele specific phasing reactions can be incorporated into them to define the cis/trans haplotype of important genetic positions. Recently the

use of a high density SNP array have also been reported for a scalable ABO genotyping method in large population level datasets capable of genotyping thousands of samples per batch.³¹

Several groups have recently published the use of both short and long read next generation sequencing (NGS) for ABO genotyping from whole genome sequencing, whole exome sequencing, and targeted NGS,³²⁻⁴⁰ including the use of automated interpretive software.^{32,35,36} One of the major advantages of NGS is that it allows for evolution of the entire ABO gene including novel genetic changes. In addition, in most cases short read NGS can fully phase the most important genetic changes, which when combined with long read NGS can fully phase the entire ABO gene. In addition, by running hundreds of samples per batch targeted NGS can reduce the per sample cost of ABO genotyping. However, current NGS methodologies still require several days for library preparation and sequencing.

Although, transfusion of red blood cells can interfere with serologic ABO typing, blood group genotyping, including ABO, has been shown to not be influenced by transfusion.⁴¹⁻⁴⁴ This is because blood group genotyping, like HLA molecular typing, is performed using genomic DNA isolated from recipient white blood cells which are generally not affected by red blood cell transfusion. However, in situation of granulocyte transfusion or stem cell transplant, ABO genotyping results need to be interpreted based on the clinical context.

ABO genotyping has proven to be highly accurate across methodologies, including some studies of deceased donors. Targeted NGS of just ABO exon 6 and 7 with automated software interpretation was 99.6% concordant to serologic ABO testing in 453 samples, with two discordances likely due to false negative serologic testing from weak expression.³⁴ NGS based whole exome sequencing with automated software interpretation of ABO exons and nearby intronic regions was 100% concordant with ABO serologic testing.⁴⁰ NGS based whole genome sequencing and automated software based evaluation of the entire ABO gene in 200 samples was 100% concordant with serologic ABO typing.³⁶ Targeted NGS of the entire ABO gene has also been applied to a set of 40 discordant serologic cases, in which it was able to explain the majority of discordances by identifying ABO alleles encoding ABO subtypes, weak ABO variants, hybrid ABO enzymatic activity, and novel genetic changes.^{38,45} Most recently, targeted NGS of ABO exons 2 to 7 with automated software interpretation of 100 deceased donors was 100% concordant with serologic ABO typing.⁴⁶ Similarly, ABO genotyping with PCR-SSP and real-time PCR in 500 deceased donors was 100% concordant with ABO serologic typing and clarified discordant forward and reverse reactions, mixed field serology, and weak anti-A₁ lectin results.⁴⁷

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