

Notice of OPTN Policy Change

Monitor Ongoing eGFR Modification Policy Requirements

Sponsoring Committee:	Minority Affairs
Policy Affected:	<i>3.7.D: Waiting Time Modifications for Kidney Candidates Affected by Race Inclusive eGFR Calculations</i>
Public Comment:	January 21, 2025- March 19, 2025
Board Approved:	June 9-10, 2025
Effective Date:	September 10, 2025

Purpose of Policy Change

The purpose of this proposal is to update and enhance ongoing policy requirements in *OPTN Policy 3.7.D: Waiting Time Modifications for Kidney Candidates Affected by Race Inclusive eGFR Calculations*.

Proposal History

The OPTN Membership and Professional Standards Committee (MPSC) referred *Monitor Ongoing eGFR Modification Policy Requirements* to the OPTN Minority Affairs Committee (MAC) upon identifying an opportunity to provide additional direction for transplant programs. These updates aim to help ensure that transplant programs are properly evaluating all kidney candidates for eGFR waiting time modifications. To develop this proposal, the MAC collaborated with a variety of stakeholders, including members from the OPTN Kidney Transplantation Committee, OPTN Transplant Coordinators Committee (TCC), OPTN Transplant Administrators Committee (TAC), and MPSC.

Summary of Changes

Require transplant kidney programs to have specific, written protocols and thorough documentation to address the requirements of *OPTN Policy 3.7.D: Waiting Time Modifications for Kidney Candidates Affected by Race Inclusive eGFR Calculations*, including:

- Confirming candidate race
- Fulfilling notification requirements
- Seeking supporting documentation of eligibility, including, at a minimum, what sources will be reviewed

Update ongoing requirements within *OPTN Policy 3.7.D: Waiting Time Modifications for Kidney Candidates Affected by Race Inclusive eGFR Calculations* for the following policy sections:

- *3.7.D.i. Notification Requirement*
 - Update to include eligibility and outcome ¹ notifications for kidney candidates

¹ Only required for candidates that had an eGFR modification submitted on their behalf.

- Require transplant programs to provide applicable kidney candidates with an outcome notification within 10 business days of receipt from OPTN
 - Apply proposed notification requirements to kidney candidates registered on or after January 4, 2024
 - Require transplant programs to complete this requirement by September 11, 2026
- *3.7.D.ii Determination of Eligible Candidates*
 - Update language to support the existing requirement that every kidney candidate registered on the OPTN waiting list is required to be assessed for eGFR waiting time modification eligibility
- *3.7.D.iv Reporting Requirements for Kidney Transplant Programs*
 - Remove outdated language that required each program to submit attestation documentation by January 3, 2024

Implementation

Transplant Programs:

- Document the kidney program's protocol for meeting *OPTN Policy 3.7.D* and maintain documentation of compliance
- Notify all kidney candidates registered on or after January 4, 2024, of their eligibility and any wait time modification outcomes within one year of implementation
- Notify kidney candidates within 10 business days of receiving a wait time modification outcome from the OPTN

Organ Procurement and Transplantation Network:

- Provide member communications and educational materials to aid transplant programs in meeting updated requirements
- Continue to review complete modification submission requests, notify kidney transplant programs of outcome, and process approved waiting time
- Conduct non-routine protocol reviews for all transplant programs within the first year, in addition to incorporating policy compliance evaluation into routine transplant hospital surveys

Affected Policy Language

New language is underlined (example) and language that is deleted is struck through (~~example~~).

3.7.D Waiting Time Modifications for Kidney Candidates Affected by Race-Inclusive eGFR Calculations

Transplant hospitals must develop and comply with a written protocol that includes processes for meeting the requirements of *Policy 3.7.D*, including:

- Confirming candidate race
- Fulfilling notification requirements
- Seeking supporting documentation including at a minimum, what sources will be reviewed

The transplant hospital must document that above processes were completed, including the results of the review of sources, in the candidate's medical record.

3.7.D.i Notification Requirement

All designated kidney transplant programs must notify every candidates, including those registered on or after 1/4/2024 that of the following: at the transplant program of the responsibilities of the program pursuant to Policy 3.7.D: Waiting Time Modifications for Kidney Candidates Affected by Race-Inclusive eGFR Calculations.

1. Programs are required to submit eGFR waiting time modifications for candidates affected by race inclusive eGFR calculations ~~Wait time modifications are available for candidates affected by race inclusive eGFR calculations, as outlined in policy 3.7. D (education notification).~~
2. ~~Of Whether or not the candidates is~~ are eligible eligibility for an eGFR modification (eligibility notification).
3. ~~All designated kidney transplant programs must notify all candidates of~~ The outcome of the eGFR modification submission the eGFR modification submission outcome, for applicable candidates (outcome notification).
 - Programs must notify candidates within 10 business days following the program's receipt of modification outcome from the OPTN.

3.7.D.ii Determination of Eligible Candidates

All designated kidney transplant programs must determine eligibility for a Waiting Time Modification for Kidney Candidates affected by Race-Inclusive eGFR Calculations for each candidate registered at the transplant program. A candidate is eligible for a waiting time modification if the candidate is registered as Black or African American in the OPTN Computer System and has documentation establishing that the candidate had an eGFR that was over 20 mL/min and would have been 20 mL/min or less if a race-neutral calculation had been used. Every kidney transplant candidate needs to be assessed for eligibility regardless of waiting time criteria or status, including candidates registered for multi-organ transplant.

3.7.D.iii Application for Waiting Time Modification

Transplant programs must submit an eGFR waiting time modification for each eligible candidate registered at their transplant program. The application for an eGFR waiting time modification must include the qualifying eGFR value, as well as:

1. Documentation of one of the following:
 - The candidate's eGFR values for Black and non-Black candidates or
 - The estimation of GFR with a race-inclusive calculation and a re-estimation of GFR with a race-neutral calculation
2. The name and signature of the candidate's physician or surgeon.

Upon receipt of a complete application the OPTN will implement the waiting time modification.

3.7.D.iv Reporting Requirements for Kidney Transplant Programs

All designated kidney transplant programs must submit an attestation to the OPTN by January 3, 2024, signed by the transplant program director (or their designee), affirming that the program has completed both of the following:

- ~~Notification to all candidates registered at the transplant program of their eligibility for a waiting time modification according to this policy and~~

- Submission of eGFR waiting time modifications for all eligible candidates registered at the transplant program.