FAQs regarding inactivating an individual candidate, a program’s waitlist, a transplant program or a living donor component during the COVID-19 crisis

Due to the national crisis, members may be considering whether to opt to inactivate an individual candidate, a program’s waitlist, a transplant program or a living donor component. Different scenarios involve different requirements. Below is option-specific information to assist transplant programs in determining the approach that will work best for their program. Additional guidance is provided at the end of this document.

Individual candidate inactivation

Q: What is required for individual candidate inactivation?
A: A program can inactivate candidates individually in Waitlist℠, making them status 7. The program must report a reason why the candidate is status 7. The program should use “COVID-19 precaution” reason.

Q: Can individual candidates accrue wait time?
A: Each organ specific policy has different rules around whether wait time accrues while a patient is status 7.

Q: Does individual candidate inactivation require notification to the OPTN?
A: The only requirement is to change the candidate status in UNet℠ to “inactive.” No additional notice is required.

Q: Is patient notification required for individual candidate inactivation?
A: No.

Q: What are the requirements for individual candidate reactivation?
A: The program must change the candidate’s status back to “active” in UNet. Reactivation may also require submitting new clinical data to justify the candidate’s status.

Q: What are the relevant bylaws and policies that provide guidance?
A: OPTN Policy 3.6.A Waiting Time for Inactive Candidates

Inactivating a program’s waitlist

Q: What is required for inactivating a program’s waitlist?
A: See additional guidance on patient notification below. A program can set its waitlist status in UNet to inactive; the program will receive no offers and all candidates are screened off every match. If you need additional guidance on how to inactivate the program’s waitlist in UNet, go to Waitlist Help Documentation: Home > Using the Waitlist Application > Acceptance Criteria > Editing/Applying Listing Defaults or contact the UNOS Help Desk: (800) 978-4334

Q: Can candidates accrue wait time?
A: Candidates continue to accrue waiting time based on their listing status.

Q: Does inactivating a program’s waitlist require notification to the OPTN?
A: The only requirement is to change the waitlist status in UNet to inactive. No additional notice is required.
Q: Is patient notification required for inactivation of a program’s waitlist?
A: See additional guidance on patient notification at end of document. No candidate notification required unless the program waitlist status remains inactive past 14 days or if the program’s waitlist has been inactive for 28 or more days during a calendar year. A sample notification letter is available on the COVID-19 information page.

Q: What are the requirements for program waitlist reactivation?
A: None. The program must turn the waitlist back on through UNet.

Q: What are the relevant bylaws and policies that provide guidance?
A: OPTN Bylaws Appendix D, Section D.12.B has time limits for waitlist inactivity. Programs must notify patients after 14 days of continuous inactivity and also in instances of 28 days or more of cumulative inactivity in a calendar year. Appendix K, Section K.2 describes short term inactivation.

Inactivating a transplant program

Q: What is required for inactivating a program?
A: See additional guidance on patient notification below. A program may request that its program membership status be changed to inactive. For program inactivation, the program candidates receive no offers and all candidates are screened off any match.

Q: Can candidates accrue wait time if the program is inactive?
A: Candidates continue to accrue waiting time based on their listing status.

Q: Does inactivation of a program require notification to the OPTN?
A: Yes. See additional guidance below. Programs are required to notify the OPTN at membershiprequests@unos.org. A sample notification letter is available on the COVID information page.

Q: Is patient notification required for inactivation of a program?
A: Yes. See additional guidance below. A sample notification letter is available on the COVID-19 information page.

Q: What are the requirements for reactivation of a program?
A: Programs are required to request reactivation through UNOS Membership at membershiprequests@unos.org

Q: What are the relevant bylaws and policies that provide guidance?
A: OPTN Bylaws Appendix K, Sections K.1, K.3 and K.5

Inactivating a living donor component

Q: What is required for inactivating a living donor component?
A: A living donor component may request that its membership status be changed to inactive. For living donor component inactivation, no living donor recoveries can be performed.

Q: If inactivating a living donor program, can evaluations still be performed?
A: Yes. Living donor programs that inactivate may still perform evaluations. If the program does choose to continue evaluations, we believe the program should inform the patient that they will not receive organ offers while the program is inactive.

Revised March 27, 2020
Q: If a program is inactive, can patients still be registered?
A: It depends. If you inactivate your waitlist but not your program, you can still register patients on Waitlist. If you choose to inactivate your program, then you will not be able to register patients.

Q: Does temporarily suspending living donor recoveries due to COVID-19 require inactivating the living donor component at your center?
A: A center will not be identified for functional inactivity if recoveries are temporarily suspended due to COVID-19 with the intention to resume when deemed safe by the center. We believe it is in a center’s and patient’s best interest that a program notify the OPTN and notify their patients, but it is not required.

Q: If temporarily suspending living donor recoveries, is patient notification required?
A: It is not a requirement to notify patients unless formally inactivating the component by requesting the membership status be changed to inactive. While delaying living donor recoveries is a clinical decision, we believe it is in a center’s and patient’s best interest to keep the lines of communication open with when the schedule has been affected.

Q: If inactivating a program’s living donor component, is patient notification required?
A: Yes. See additional guidance below. A sample notification letter is available on the COVID-19 information page.

Q: Does inactivation of a living donor component require notification to the OPTN?
A: Yes. See additional guidance below. Programs are required to notify the OPTN at membershiprequests@unos.org. A sample notification letter is available on the COVID information page.

Q: What are the requirements for reactivation of a living donor component?
A: Programs are required to request reactivation through UNOS Membership at membershiprequests@unos.org

Q: What are the relevant bylaws and policies that provide guidance?
A: OPTN Bylaws Appendix K, Sections K.1 and K.3.

Guidance on notification of both patients and the OPTN in accordance with Applicable Bylaw Appendix K.

Requirements for notice to patients if a program or living donor component inactivates

If the program or living donor component inactivation is related to COVID-19, the patient notification requirements will be applied reasonably and flexibly including the following:

- Proof of receipt will not be required.
- Communication may be sent by letter, mass email, website notification, or other methods deemed appropriate. A sample letter is available on the COVID-19 information page.
- We will ask that notification to patients be made within a reasonable time frame but not necessarily within seven days if that poses difficulty.
- You must provide information to the OPTN regarding how patients were notified. A template is available on the COVID-19 information page.
- The program will not need to submit a list of patients notified to the OPTN.

Revised March 27, 2020
- The assumption will be that patients will not be transferring in the current situation so you do not need to provide documentation that patients are not transferring.
- If a patient does transfer and the program needs assistance with the transfer, please contact membershiprequests@unos.org.