Proposed Patient Notification of Functional Inactivity Due to Lack of Transplant Activity

Membership and Professional Standards Committee
Carl Berg, Chair
June 23-24, 2014
The Problem

- Some programs repeatedly identified as functionally inactive
- Concerns regarding ability to maintain currency
- Concerns regarding patient access to transplant
Goal of the Proposal

- Provide candidates and potential candidates with information about transplant program activity level
- Encourage programs to find ways to increase the volume of transplants
- Encourage programs to evaluate need for program
How the Proposal will Achieve its Goal

- Send notification to all candidates and potential candidates to include:
  - Dates during which no transplants performed
  - Reason for no transplants
  - Options for candidates – multiple listing or transfer
  - OPTN Contractor’s Patient Information Letter

- Within 30 days of receipt of letter from MPSC
Strategic Plan

- **Goal:** Promote transplant patient safety

- **Objective:** Maintain high level of medical expertise

- **Strategy:** Ensure physicians and surgeons at transplant centers have current, relevant expertise

- **Initiative:** Reassess inactivity requirements of programs
Table 1. Number of Programs Identified as Functionally Inactive due to lack of transplant activity and the number previously reviewed.

<table>
<thead>
<tr>
<th>Meeting Date</th>
<th>Newly Identified</th>
<th>Previously Reviewed</th>
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</thead>
<tbody>
<tr>
<td></td>
<td>PA/KP</td>
<td>KI</td>
</tr>
<tr>
<td>Apr 2013</td>
<td>9</td>
<td>1</td>
</tr>
<tr>
<td>Dec 2012</td>
<td>4</td>
<td></td>
</tr>
<tr>
<td>Jul 2012</td>
<td>6</td>
<td></td>
</tr>
<tr>
<td>Mar 2012</td>
<td>7</td>
<td>1</td>
</tr>
<tr>
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<td>7</td>
<td>1</td>
</tr>
<tr>
<td>July 2011</td>
<td>4</td>
<td></td>
</tr>
<tr>
<td>Mar 2011</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>Oct 2010</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>Jul 2010</td>
<td>3</td>
<td></td>
</tr>
<tr>
<td>Mar 2010</td>
<td>3</td>
<td></td>
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</table>

PA/KP = Pancreas/Kidney and Pancreas; KI = Kidney; LU = Lung; HR = Heart; LI = Liver
Supporting Evidence

- Alternative programs in close proximity to most functionally inactive programs
- KP and pancreas alone candidates at low volume programs waited longer
- No clear evidence that waiting list mortality rates higher at low volume pancreas programs
30 programs met notification thresholds affecting approximately 500 candidates
- 27 had 30 or fewer candidates
- 3 had waiting lists of 38, 46 and 76 candidates
- Data unavailable on number of patients under evaluation
Impact on Members

- Send notification to candidates & potential candidates
- Provide representative copy of notification to MPSC
- Provide list of patients that received notification to MPSC
Additional Revisions

- Inability to serve patients for 15 or more consecutive days was removed from the functional inactivity section to Appendix K.1. as a reason to voluntarily inactivate the program.

- Removed reference to inability to perform transplants from the waiting list inactivation provision in D.10 B.

- Removed paragraph in referencing requirements of voluntary inactivation from Appendix D.9 since it duplicates information contained in K.3.
## Public Comment Response Tally

<table>
<thead>
<tr>
<th>Type of Response</th>
<th>Response Total</th>
<th>In Favor</th>
<th>In Favor as Amended</th>
<th>Opposed</th>
<th>No Vote/No Comment/Did Not Consider</th>
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<tr>
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<td>7 (63.6%)</td>
<td>1 (9.1%)</td>
<td>3 (27.3%)</td>
<td>0</td>
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<tr>
<td>Committee</td>
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<td>8 (88.9%)</td>
<td></td>
<td>1 (11.1%)</td>
<td>8</td>
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</table>
Public Comment

- Definition of potential candidate – post public comment amendment
- Need for review of functional inactivity & thresholds arbitrary
- Penalizing start-up programs
- Pancreas program problem
- Limiting patient access - closure of programs
Amend definition of potential candidate to be consistent with definition in Appendix M, Definitions

- Remove two definitions from Appendix M, Definitions:
  - Functional Inactivity
  - Long-term inactivity
Resolution

- RESOLVED, that Bylaws, Appendix D Membership Requirements for Transplant Hospitals and Transplant Programs, Sections 9 and 10; Appendix K Transplant Program Inactivity, Withdrawal, and Termination, Sections 1 and 3; and Appendix M Definitions are modified as set forth in Exhibit E, effective September 1, 2014.