

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

Supporting Evidence

Table 1. Number of Programs Identified as Functionally Inactive due to lack of transplant activity and the number previously reviewed.

Meeting Date	Newly Identified					Previously Reviewed				
	PA/KP	KI	LU	HR	LI	PA/KP	KI	LU	HR	LI
Apr 2013	9	1				2				
Dec 2012	4			1		3			1	
Jul 2012	6					5				
Mar 2012	7	1	2	1		5		2		
Dec 2011	7	1				5				
July 2011	4			1	1	2			1	
Mar 2011	5					4				
Oct 2010	2			1						
Jul 2010	3					2				
Mar 2010	3			1		3			1	

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

Programs & Patients Affected (2012)

- 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

Public Comment Response Tally

Type of Response	Response Total	In Favor	In Favor as Amended	Opposed	No Vote/ No Comment/ Did Not Consider
Individual	42	28 (66.7%)		14 (33.3%)	12
Regional	11	7 (63.6%)	1 (9.1%)	3 (27.3%)	0
Committee	18	8 (88.9%)		1 (11.1%)	8

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

Post Public Comment Amended Proposal

- 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.**