

Site Survey/Desk Review Snapshot

The table below summarizes the OPTN policies and bylaws routinely reviewed. *Please note, any OPTN policy or bylaw is subject to review.*

For more detailed information about OPTN monitoring practices, please refer to the Evaluation Plan available on the OPTN web site at www.optn.org.

To access the Plan, mouse over Policies in the top toolbar and click on Evaluation Plan.

Policy and Bylaw References	Review Component	Heart	Liver	Lung	Kidney	Pancreas	Intestine	Top 5?
OPTN Bylaws, Appendix B, Section II.F	<ul style="list-style-type: none"> • Patient notification upon addition or removal from the OPTN waiting list • Notification of patient notification hotline telephone number 	X	X	X	X	X	X	Yes
Policy 3.1.2	ABO verification of donor and recipient prior to implantation	X	X	X	X	X	X	Yes
Policy 3.1.4.2	ABO typing twice prior to registration on the OPTN waiting list	X	X	X	X	X	X	Yes
3.2.4.1 (Kidney) 3.6.6 (Liver) 3.7.14 (Heart and Lung) 3.8.6.7 (Pancreas) 3.11.5 (Intestine)	Timely removal of patients from the OPTN waiting list after transplantation or death	X	X	X	X	X	X	Yes
Policy 3.2.3	Notification of multiple listing	X	X	X	X	X	X	
Policy 3.6.4 (Liver)	<ul style="list-style-type: none"> • Verification of clinical criteria supporting urgent status listings • Laboratory dates and values and demographic data submitted to UNetSM for candidates with a MELD/PELD score equal to or greater than 20 and transplanted candidates • Documentation to support all information entered into the exception application 		X					Yes
Policy 3.7.3 and 3.7.4 (Heart)	Verification of clinical criteria supporting urgent status listings and demographic data	X						
Policy 3.7.6 (Lung)	<ul style="list-style-type: none"> • Clinical variables and demographic data submitted to UNetSM for lung candidates • Documentation to support all information entered into the exception application 			X				
Policy 5.7	Appropriate vessel storage, recovery, and transplant	As appropriate						
Policy 7.8.1	Data submission (Tiedi [®] forms)	X	X	X	X	X	X	
Policy 7.1.1	Appropriate removal code usage for recipients who expired on or near the transplant date	X	X	X	X	X	X	

Top Five Policy Violations on Site Surveys that resulted in MPSC action in 2007

- 1. OPTN Bylaws, Appendix B, Section II F Patient Notification** – Transplant centers do not have records of notifying patients within 10 days of listing or removal from the list for reasons other than transplant or death, do not include the date of listing in the body of the letter, or do not include the telephone number that is available to patients and others to report concerns or grievances through the OPTN.
- 2. 3.1.2 Transplant Center** – Transplant centers do not maintain records of verification of the recorded donor ABO with the recorded ABO of the intended recipient upon receipt of an organ, prior to implantation.
- 3. 3.1.4.2 Waiting List** – Transplant centers do not appropriately ensure that each transplant candidate is ABO typed on two separate occasions prior to listing.
- 4. 3.6.4.1 Adult Candidate Status** – Transplant centers' liver programs may not correctly enter information into UNetSM justification forms or MELD exceptions, or may not have the required medical record documentation to support candidates' listings.
- 5. 3.6.6 and 3.7.14 Removal of Liver and Thoracic Transplant Candidates from Waiting Lists When Transplanted or Deceased** – Transplant centers do not remove candidates from the OPTN Waiting List within 24 hours of transplant or death.

Top Five Other Policy Violations that resulted in MPSC action in 2007

- 1. 3.2.4 Match System Access** – The MPSC cited both transplant centers and OPOs. An organ was either allocated or transplanted into a recipient who did not appear on a match run.
- 2. 3.3.6 Center Acceptance of Organ Offers** – The MPSC cited both transplant centers and OPOs. Transplant Centers or OPOs withdraw acceptance or offers respectively once the official offer has been accepted.
- 3. 5.0 Standardized Packaging and Transporting of Organs and Tissue Typing Materials Labeling Specifications** – OPOs sent organs or tissue typing material with insufficient information or erroneous package labeling.
- 4. 3.5.5.3 Kidney Payback Debt Limit** – OPOs exceeded the payback debt threshold of nine total debts across all blood groups.
- 5. 7.8.1 Data Submission Standard** – The MPSC cited transplant centers, OPOs and labs. OPOs, transplant centers, and labs do not submit 100% of expected forms within six months of the due date.*

*The MPSC acted on this specific violation multiple times during 2006 and 2007.

References: <http://www.optn.org/policiesAndBylaws/> Links to the Bylaws, Policies, Evaluation Plan, and the Final Rule.

Additional Information about policy compliance can be obtained by contacting:

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