

## **ASTS Responses to OPTN Proposals Open for Public Comment**

March 15, 20203

## Align OPTN KPD Blood Type Matching Policy and Establish Donor Re-Evaluation Requirements

The UNOS KPD program is one of the smallest KPD exchanges in the US, and currently addresses less than 50 transplants per year. Larger exchanges such as NKR facilitate more than 1000 KPD exchanges, so any changes to UNOS KPD policy will not be significantly impactful to the KPD patient population at large. The psychosocial and medical re-evaluation requirements are reasonable given the current program performance – it takes almost 6 months to run the first crossmatch for the first patient. If 20-30 programs that are involved with UNOS KPD as their KPD conduit, this is not an undue burden. There are very few patients in the UNOS KPD, so the number of patients per program are few as well. Medical and psychosocial elements collected should reflect the safety of the living donor to go forward with surgery in a timely manner. The donor reevaluation should be related to the first date the donor has been active in the OPTN KPDPP system,. The 60-day prior notice is reasonable as is the 90-day interval between notification and potential donor eligibility related to donor ineligibility. Blood type alignment requirements are appropriate.

The reality of this proposal is that it does make some of the processes around UNOS KPDPP better, but the program itself has inherent operational inefficiencies that are evident from the data compared to other exchanges. These changes are unlikely to be transformative in facilitating many more UNOS KPD exchanges.

## **ASTS Position: Support**