



**ANNA**  
American Nephrology  
Nurses Association

September 20, 2024

**To:** United Network for Organ Sharing [publiccomment@unos.org](mailto:publiccomment@unos.org)

**Re:** Organ Procurement and Transplantation Network (OPTN) Public Comment Proposals – Summer 2024

On behalf of the American Nephrology Nurses Association (ANNA), thank you for allowing us the opportunity to comment on the **Organ Procurement and Transplantation Network (OPTN) Public Comment Proposals - Summer 2024**.

Our comments for several of the current policy proposals are as follows:

**Continuous Distribution of Kidneys Update, Summer 2024**

**ANNA agrees.** We have reviewed the updates and support continuous work on this project.

**Continuous Distribution of Pancreata Update, Summer 2024**

**ANNA agrees.** We have reviewed the updates and support continuous work on this project.

**Update Histocompatibility Bylaws**

**ANNA agrees.** Changes to the OPTN bylaws should align with the Clinical Laboratory Improvement Amendments (CLIA) update.

**Require Reporting of HLA Critical Discrepancies and Crossmatching Events to the OPTN**

In response to the posted questions:

1. Should the discovering labs or the lab that had the error be responsible for reporting critical HLA discrepancies to the OPTN? **ANNA agrees with reporting critical discrepancies and crossmatching events to the OPTN.**
2. Is 24 hours an appropriate time frame for the initial report of a critical HLA discrepancy to the OPTN? **Yes – if it matches the timeframe to be reported to the OPOs.**
3. Do you agree with the modified definition of a critical HLA discrepancy? **Yes.**

4. Should incorrect donor or recipient samples used for crossmatch be included in required reports? **Yes.**
5. Should incorrect donor HLA typings or incorrect candidate HLA antibody test used for virtual crossmatch be included in required reports? **Yes.**

Of note, additional guidance will be needed for Histocompatibility Labs related to the statement '*Upon review of the reported incident, this may involve performing root cause analysis to determine the cause of HLA critical discrepancy and implementing corrective action plans as needed.*' This could be a complex and time-consuming process.

### Revise Conditions for Access to the OPTN Computer System

In response to the posted questions:

1. Do you agree with the bylaw changes for OPTN and membership regarding small and new businesses? ***We agree that OPTN membership should be a requirement to access the OPTN computer system. We also agree with security requirements and enhancements to protect OPTN and patient data.***
2. Is a proposed transition plan feasible for members? Should this additional information be required?? **Yes.**
3. Are there any additional obstacles to completing the transition plan members are aware of? Is this where additional information is required? ***ANNA does not have enough information to adequately address this question. However, we believe the goal is important and implementation should be made easier to reduce potential barriers to OPTN business membership.***

On behalf of ANNA, thank you again for the opportunity to comment. If you have any questions or require additional clarity to any of the comments provided, please do not hesitate to reach out to me at [Diane.Derkowski@atriumhealth.org](mailto:Diane.Derkowski@atriumhealth.org).

Sincerely,

*Diane Derkowski, RN*

Diane Derkowski, MA, RN, CNN, CCTC

ANNA Transplant Specialty Practice Network (SPN) Best Practice Advisor

ANNA – OPTN/UNOS Representative

cc: Nancy Colobong Smith, MN, ARNP, ANP-BC, CNN, National President  
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