



September 28, 2022

OPTN Proposal: Update Kidney Paired Donation Policy

The National Kidney Foundation (NKF) appreciates the opportunity to offer commentary on the Organ Procurement and Transplant Network's (OPTN) policy proposal, "Update Kidney Paired Donation (KPD) Policy. We support the revisions to the kidney paired donation policy to improve the Kidney Paired Donation Pilot Program (KPDPP) efficiency and informed consent for KPD programs. We also commend OPTN in its endeavors to provide transparent communication to patients.

With nearly 100,000 people awaiting a kidney transplant in the United States and a limited supply of deceased kidneys for transplant, living kidney donation is the optimal treatment for end-stage renal disease (ESRD), and it offers outstanding outcomes for recipients.¹ Kidney paired donation is a promising pathway for kidney failure patients to receive a life-saving transplant when a potential living donor does not match the intended recipient. We support amending the current policy to reduce delays that could hamper living donation opportunities through a paired exchange. NKF encourages OPTN to continue engaging with kidney transplant centers to ensure that proposed deadlines do not create unintended consequences that may exacerbate the burden of underresourced programs.

As strong proponents of transparency and patient-centricity, NKF is in favor of OPTN updating informed consent forms to notify living kidney donors of possible financial situations that could arise that are not covered by the recipient's health insurance. We applaud OPTN for including resources like the National Living Donor Assistance Center to help reduce economic challenges in the informed consent form. We further support requiring a signature from the KPD donor, demonstrating their awareness that they may decline to participate as a living donor at any time and for any reason. Lastly, we agree with amending the informed consent language for bridge donors to allow individuals the autonomy to decide how long they are willing to participate as a bridge donor and make revisions as necessary rather than requiring a timeframe for their willingness to be a bridge donor.

We encourage OPTN to improve kidney paired donation by collaborating with stakeholders with the clinical and technical expertise necessary to expedite the paired donation process, assure more accurate matching, and leverage resources across different settings. We recommend OPTN convene a panel of external stakeholders to further explore barriers to paired donation and to identify opportunities to better capture potential unmatched prospective

¹ Van Pilsum Rasmussen, Sarah E et al. "The Tangible Benefits of Living Donation: Results of a Qualitative Study of Living Kidney Donors." *Transplantation direct* vol. 6,12 e626. 10 Nov. 2020, doi:10.1097/TXD.0000000000001068



donors. Please contact Morgan Reid, Director of Transplant Policy and Strategy (morgan.reid@kidney.org), if NKF can assist in arranging this convening.

Sincerely,

A handwritten signature in black ink, appearing to be "K Longino".

Kevin Longino
CEO and Transplant Patient

A handwritten signature in black ink, appearing to be "P Palevsky, MD".

Paul Palevsky, MD
President