

The OPO Response to the CMS Final Rule: Proactively Preparing for the Changes

TODAY'S PANELISTS



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I O W A
DONOR NETWORK

Continuing Education Information

Evaluations & Certificates

Nursing

The Organ Donation and Transplantation Alliance is offering **1.0 hours of continuing education credit** for this offering, approved by The California Board of Registered Nursing, Provider Number CEP17117. No partial credits will be awarded. CE credit will be issued upon request within 30 days post-webinar.

CEPTC

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Certificate of Attendance

Participants desiring CE's that are not being offered, should complete a certificate of attendance.

- Certificates should be claimed within 30 days of this webinar.
- We highly encourage you to provide us with your feedback through completion of the online evaluation tool.
- Detailed instructions will be emailed to you within the next 24 hours.
- You will receive a certificate via email upon completion of a certificate request or an evaluation
- Group leaders, please share the follow-up email with all group participants who attended the webinar.



Deanna Fenton

Program Manager



Need Assistance?

Contact Us via Zoom Chat, or
info@organdonationalliance.org
786-866-8730

Meet Our Moderator



Christy Bridwell BA, MPH

Hospital Services Liaison



Meet Our Panelists



Christie Ryan

Director, Professional
Services and Regulatory
Affairs



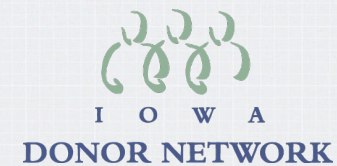
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**Preventing Organ Process Breakdowns:
The Right Timing Saves Lives**

be a *hero*. be an organ donor.



MISSION

To *Save* and *Heal* lives
through donation.

VISION

Every potential donor will make
A Pledge for Life.

VALUES

Compassion, Education, Innovation,
Integrity, Life, Quality, Respect,
Responsiveness.

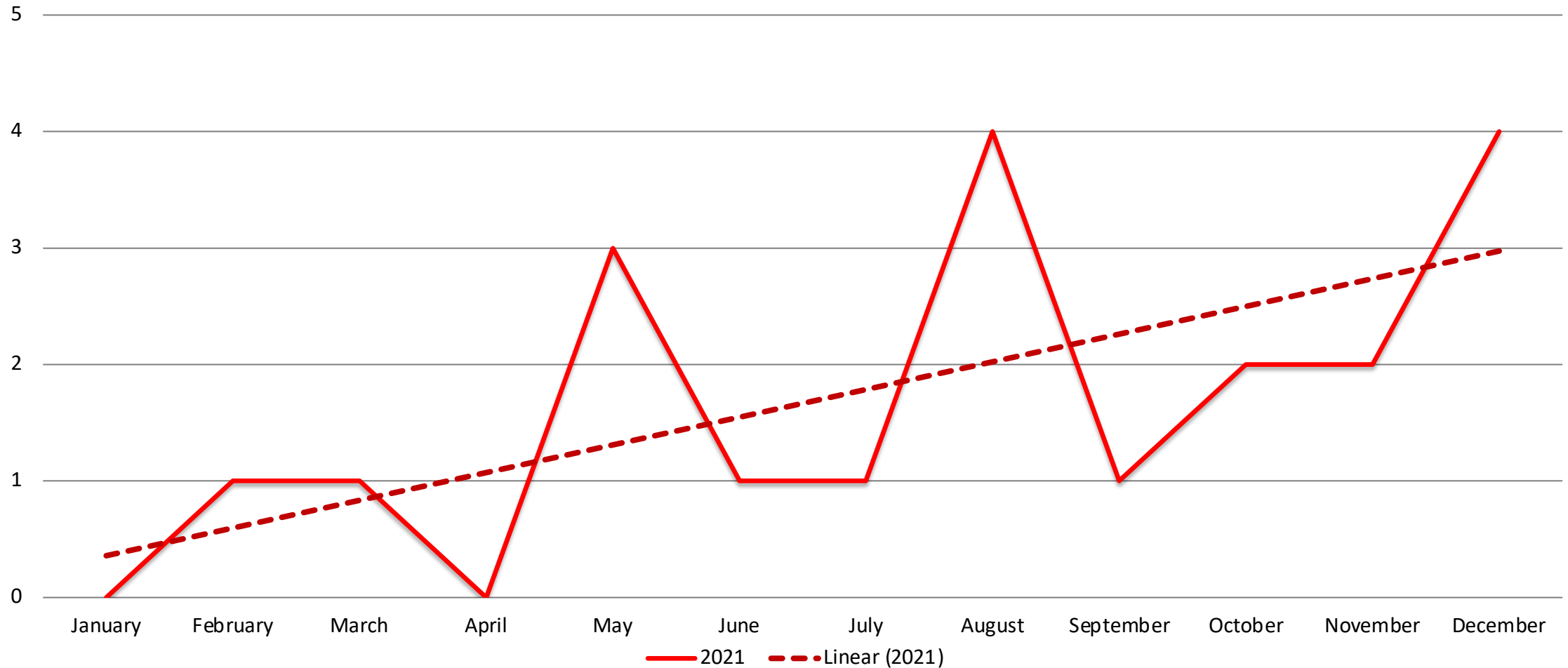
Situation Background

- Hospital experienced frequent process breakdowns related to extubation cases
- Extubations with potential missed donations deemed as a Sentinel Event
 - One Sentinel Event in 2021
- Recognized a need for a sustainable process improvement to prevent future occurrences



**Allegheny General
Hospital**

Untimely Extubation Cases at AGH 2021



Data Analysis

A3 Thinking



Identifying the Problem



Understanding the Problem



Defining the Ideal State



Designing Countermeasures



Analyze Effectiveness/Receive
Feedback

Problem Statement

- In 2021, 20 patients who met clinical criteria based on CORE guidelines were extubated without an appropriate referral.
- This may result in loss of organ donation.
- There is a regulatory requirement to support organ donation. (SOA)

Results of Extubation

Loss of lives and decreased quality –
potentially missed at least 26
donations since 1/1/2021

Patients in waiting experience
greater physical/mental demands,
uncertainty in their life and
relationships

Increased costs of treating a patient
waiting for transplant - \$4,800 per
patient per month

Per CORE advisory mtg., AGH has significantly more premature extubations than other hospitals

No RL6 about extubations

CORE not a mandatory competency

RN knowledge deficit

AGH culture is not supportive of organ donation/referrals

No standard SBAR for CORE handoff



3 different CORE coordinators in the past two years.

Change in practice/siloed work between CORE and Patty

No CORE education for senior staff nurses

RNs don't always call CORE during CMO discussion



Allegheny General
Hospital

Admission code fast-paced, causing poor accomplishment of task, remembering

High staff turnover

NMs/ANMs don't consistently hold staff accountable for CORE breakdowns

CORE triggers not clearly apparent in EPIC

No hard stop on Epic for notifying CORE

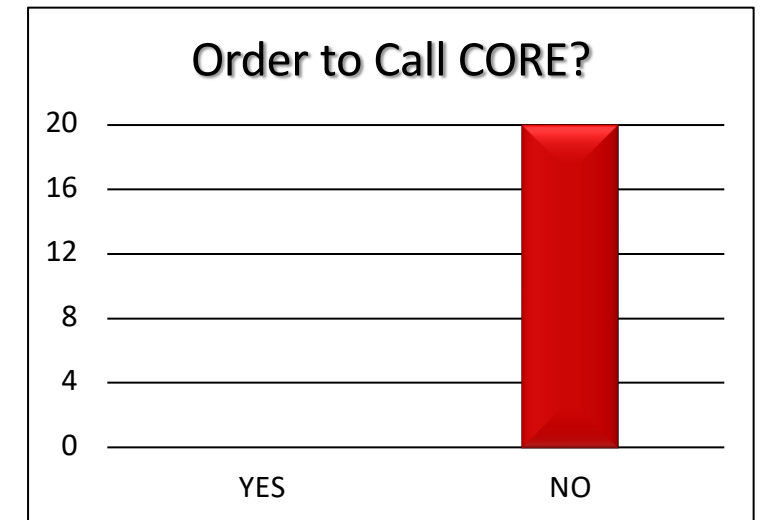
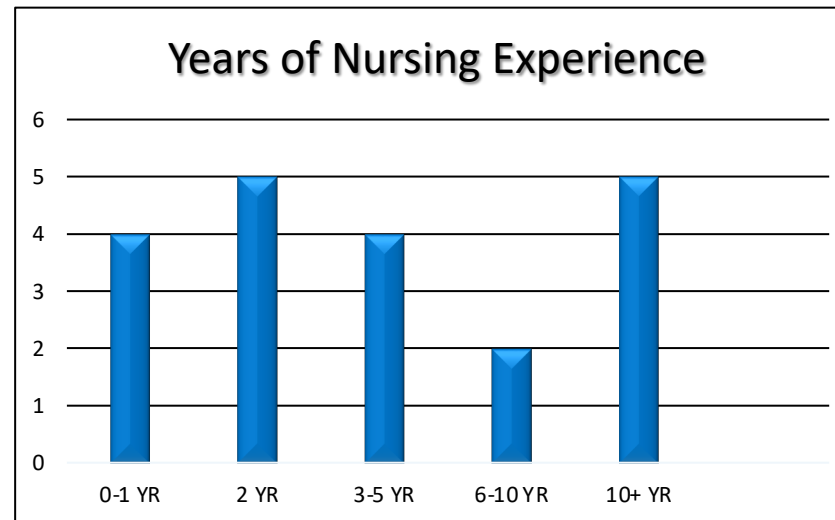
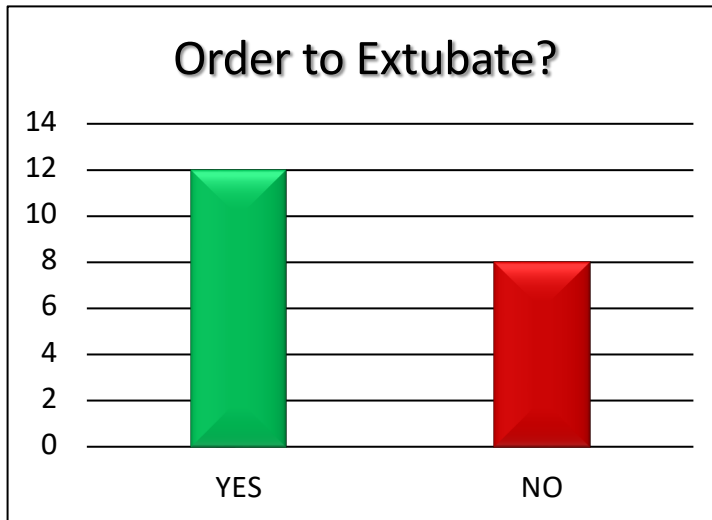
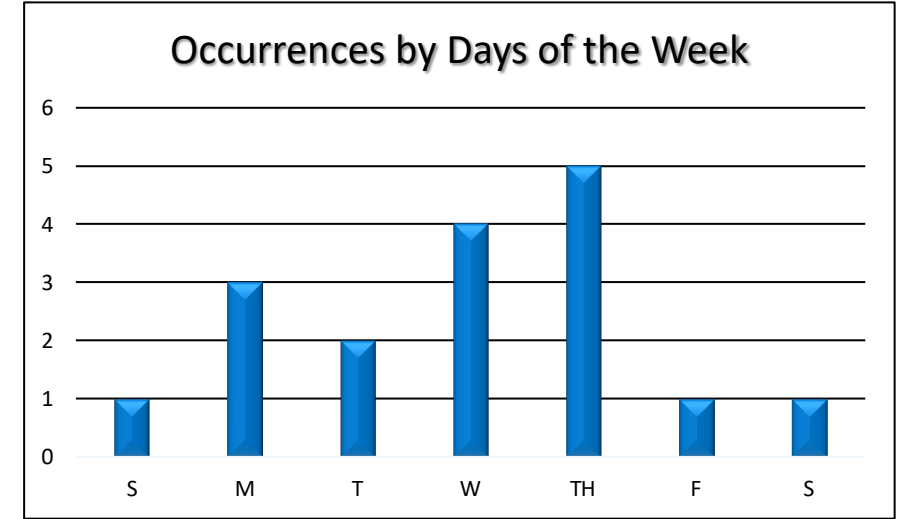
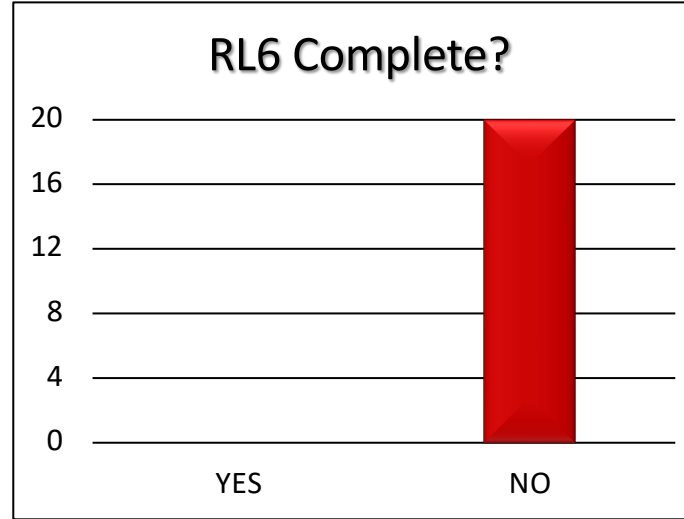
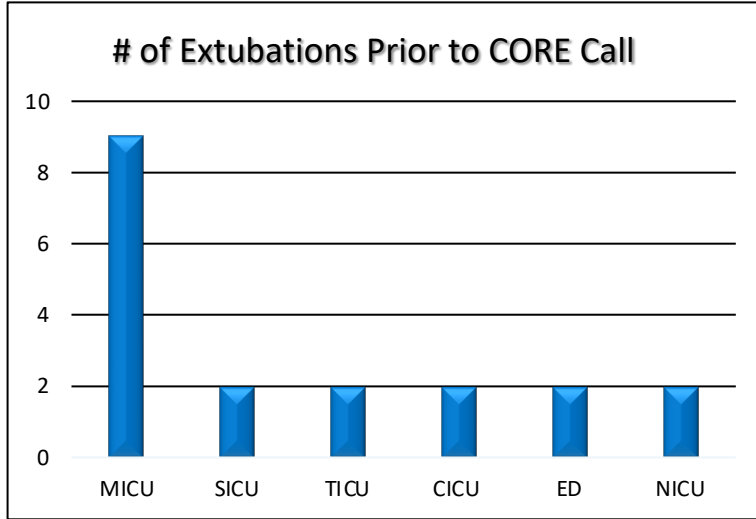
RNs don't always call CORE when triggers happen

NMs not aware of CORE referral criteria

NMs have no way to track CORE patients on the unit

Travel/Agency RNs do not get CORE education

CORE criteria not reported in report (SBAR)



Future Statement

- CORE will be notified when clinical triggers for referral are met. (Extubation)
- There will be zero sentinel events secondary to CORE referrals not being completed.

Implementations – Phase 1

Heightened Awareness

- Single-point informational poster to present this issue directly to nurses in affected departments via Gemba
- Education and awareness to stakeholders: Unit-based teams, physician teams, respiratory therapy
- In-house Presentations open for additional staff and leadership

Implementations – Phase 1

EPIC Optimization

- Implemented revised, pre-existing triggers in EPIC when patient has certain documented CORE triggers

Continuous, Ongoing Education

- Collaboration with RN Educators – new onboarding section that includes CORE for Travel RNs

We missed the call to CORE... so what?

What happens when we remove mechanical ventilation or extubate a patient without notifying CORE first?

What it means to Patients

- In 2021, we missed 13 potential donors
- AGH transplanted an average of 2.1 organs per donor
- At least 26 life-saving organs could have gone to patients in need, but now they're still waiting...
- Research has shown pre-transplantation costs account for 41% of total healthcare expenses for patients waiting on donors

What it means to Our Hospital

- Failure to call CORE before withdrawing mechanical ventilation or extubation:
 - Violates CMS guidelines
 - Places the hospital's transplant services in jeopardy
 - Results in a Sentinel (Never) Event if a donor is missed
- Loss of CMS reimbursement
 - Fiscal Year Ending 2021 total reimbursement: \$8,800,000

What should we do? Nurses

- **DO NOT** remove mechanical ventilation/extubate before calling CORE for *all* cases
- Regardless of code status, notify CORE when a vented patient meets criteria:
 - GCS of 5 or below
 - Irreversible Brain Injury
 - Ventilator Dependent w/ anticipated death
 - Code Status Change

- CORE can be reached at either:

800-366-6777

or

412-963-3550

- Order to call CORE will now be pre-selected in CMO order set

Order Sets

🔍 Orders

⚠ Supportive Care Comfort Measures Ventilator Withdrawal ⤴

▼ General

▼ Notify Physician

☒ Notify Physician - Notify CORE of imminent death at 1-800-366-6777
Routine, Once, today at 1538, For 1 occurrence

*be a **hero**. be an organ donor.*

CPR Status: No (Do Not Attempt Cardiopulmonary Resuscitation) ✓ Accept ✗ Cancel

Level of Intervention: Full Medical Treatment (Intubate if Indicated) Limited Additional Interventions (Do NOT Intubate)
Comfort Measures Only (CMO)

Comment: Staff to Contact CORE

Discussed With: Patient Parent of Minor Healthcare Agent (HCPOA) Healthcare Representative (Surrogate) Court Appointed Guardian

Code Status Comments: + Code Status Comments

Next Required Link Order ✓ Accept ✗ Cancel

- Ordering code status requires comment: Staff to Contact CORE

Confidential encounter

CPR: No , Comfort Measures Only (CMO)

POLST Filed?: None

Patient Class: Inpatient

COVID-19 Vaccine:

Current Code Status

CPR Status: No (Do Not Attempt Cardiopulmonary Resuscitation) - Set by Nurse Inpatient, RN at 2/4/2022 1735 ([View report](#))

Questions for Current Code Status

Question	Answer
Level of Intervention:	Comfort Measures Only (CMO)
Comment:	Staff to Contact CORE
Discussed With:	Patient

Code Status History

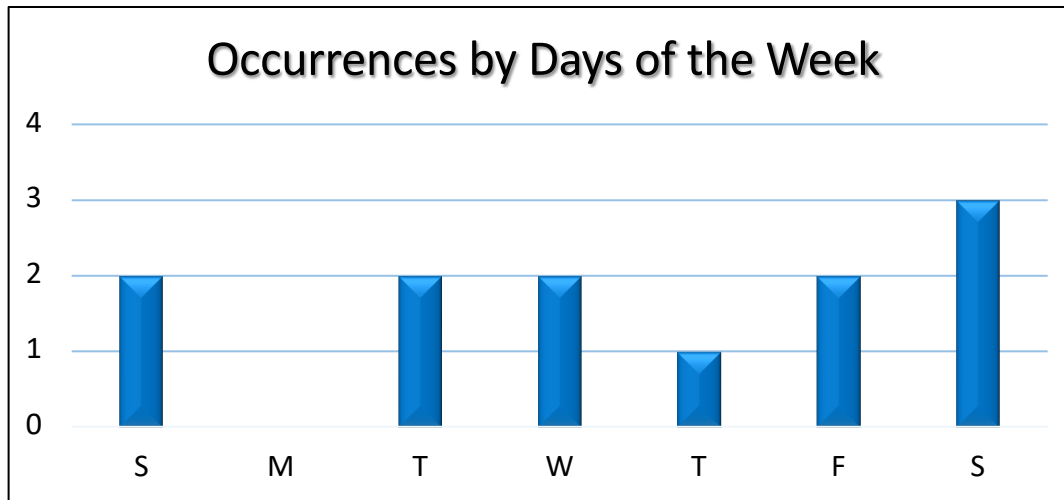
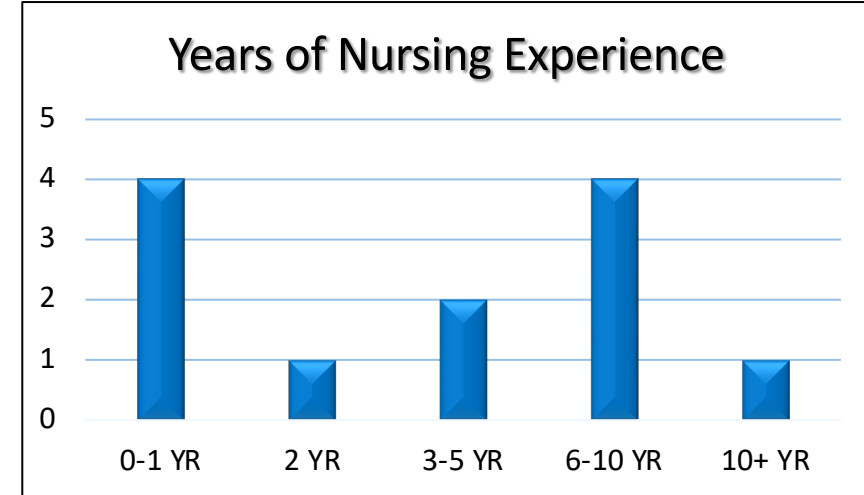
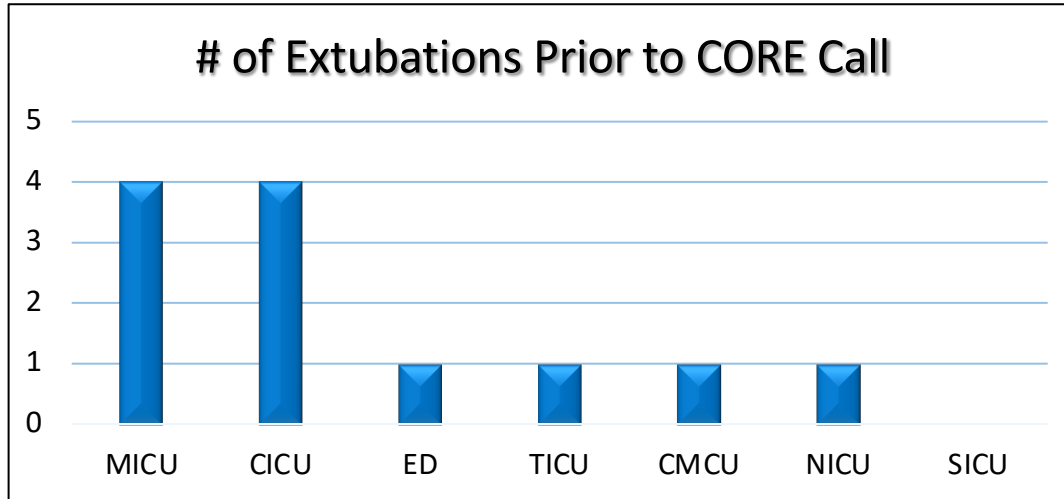
This patient has a current code status but no historical code status.

Advance Care Planning Documents

Document Type	Status	Effective Date	Expiration Date	Received On	Description
Advance Directives and Living Will	Not Received				

Clinical Nurse Educators & CORE Collaboration

- Developed special comprehensive education for weekly travel RN onboarding
 - Participation in new hire RN orientation
 - Implemented throughout AHN
- Daily rounds by on-site coordinator in ICUs and ED
- As-needed education on potentially relevant units



- No new trends in data

n = 12

Data Analysis – 2022 Cases (May YTD)

- Begin reviewing RCAs by CORE In-House Coordinator
 - **Win:** Nurses recognizing breakdowns immediately after occurring
 - Multiple missed triggers for CORE referral on early extubation cases
 - Process was known, but not followed
- Involvement of Director of Nursing
- New opportunities for enhanced compliance by accountability to current process

Implementations – Phase 2

Continuous & Ongoing Education

- Remediation Module in MyLearning
 - Intended to establish basis of AGH’s “culture of donation”
- CORE Unit Champions for additional support

Implementations – Phase 2

Unit Leadership Involvement

- New RCA tool and process to keep unit management informed and involved with breakdowns
- MyLearning Remediation PRN for staff breakdowns

EPIC Optimization

- EPIC patient report for leadership to identify patients who need CORE referrals, promotes proactive engagement with CORE



Process Breakdown Evaluation



Referral Number:	
Date of Process Breakdown:	
Process Breakdown Type:	
Hospital/Hospital Code:	
Hospital Unit/Department:	
Hospital Class:	
Was there potential for organ donation with this patient?	
How was this PBD identified by CORE? (DRR, DRC, self-reported by hospital, etc.)	
PSL:	
Parties Involved (RN, Physician, RT, Etc.). List ALL Involved:	

1. Problem Statement

2. Sequence of Events and Background Information

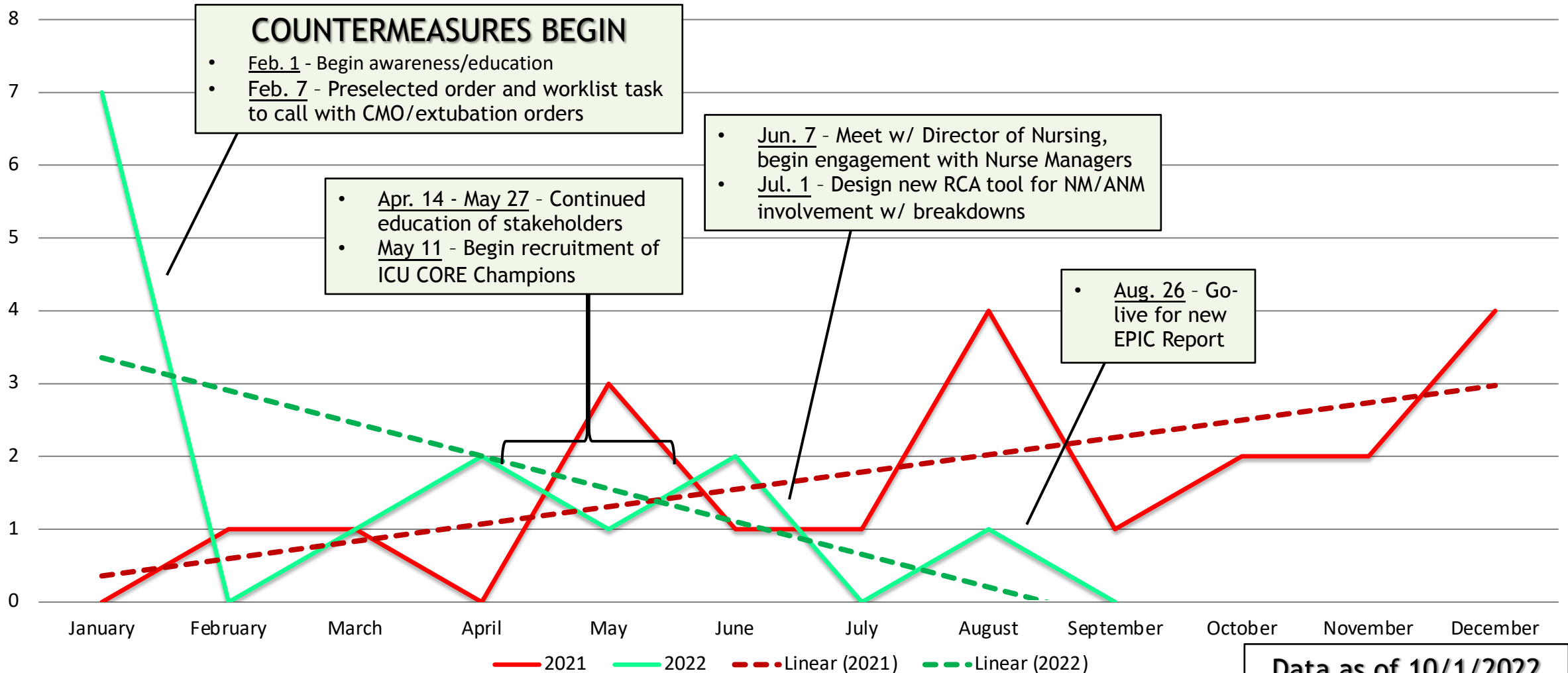
3. Error Precursors (Document "Error Precursors" that were present that had an impact on the Process Breakdown and explain how they influenced the event)
•

4. Failed Defenses (Document the defenses that should have prevented the process breakdown and describe how they were either flawed, missing, bypassed or incorrectly implemented. For a missing defense, describe the type of defense that would be needed to prevent future breakdowns)
•

5. Actions Already Completed		
Completed Action	Item(s) Addressed	Date Completed

6. Corrective Actions Needed or in Progress			
Corrective Action	Item(s) Addressed	Commitment Owner	Due Date
1.			
2.			

Untimely Extubation Cases at AGH



Data Analysis: Comparison Post Implementations

Works Cited

Brand, D. A., Viola, D., Rampersaud, P., Patrick, P. A., Rosenthal, W. S., & Wolf, D. C. (2004). Waiting for a Liver - Hidden Costs of the Organ Shortage. *Liver Transplantation*, 10(8), 1001-1010.

Burns, T., Fernandez, R., & Stephens, M. (2017). The experience of waiting for a kidney transplant: A qualitative study. *Journal of Renal Care*, 43(4), 247-255.

Cheng, X. S., Han, J., Braggs-Gresham, J. L., Held, P. J., Busque, S., Roberts, J. P., Tan, J. C., Scandling, J. D., Chertow, G. M., & Dor, A. (2022). Trends in cost attributable to kidney transplantation evaluation and waiting list management in the United States, 2012-2017. *JAMA Network Open*, 5(3), 1-11.

Center for Organ Recovery and Education. (2018). Donation Process. Retrieved from: <https://www.core.org/understanding-donation/donation-process/>

National Archives and Records Administration. (2022). Code of Federal Regulations: A point in time eCFR system. Retrieved from: <https://www.ecfr.gov/current/title-42/chapter-IV/subchapter-G/part-482?toc=1>



*be a **hero**. be an organ donor.*

Thank you!
Questions?



Driving DCD Donation:

Identifying the Gaps

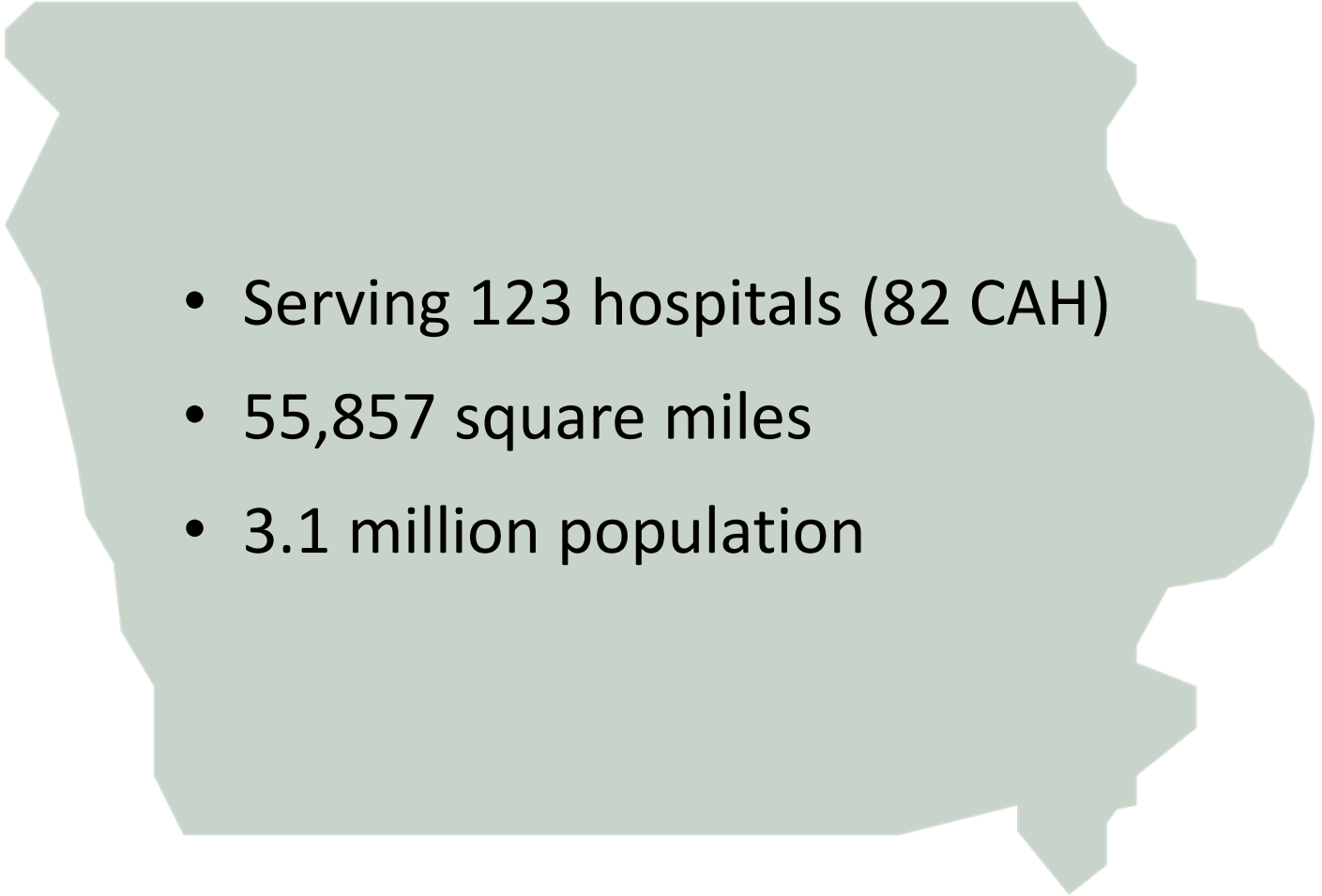
About Iowa Donor Network



DONOR NETWORK

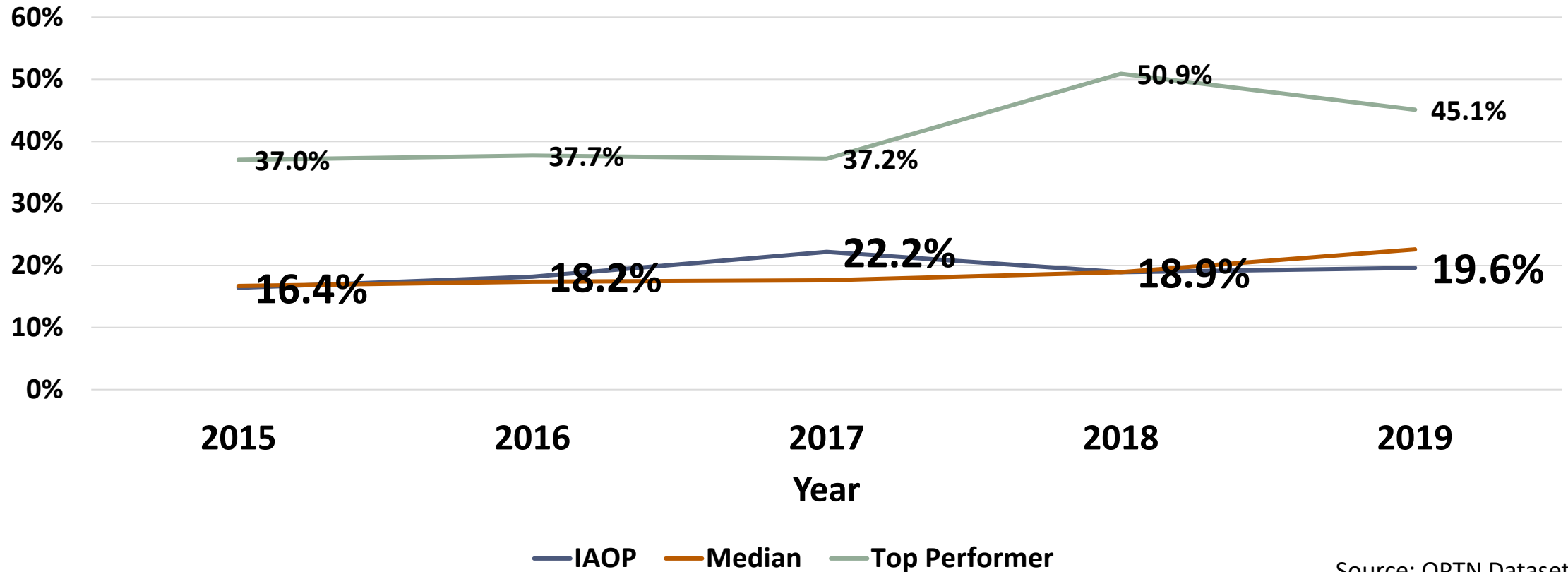
MISSION *Working together to transform lives through organ and tissue donation*

VISION *All are inspired to donate life*

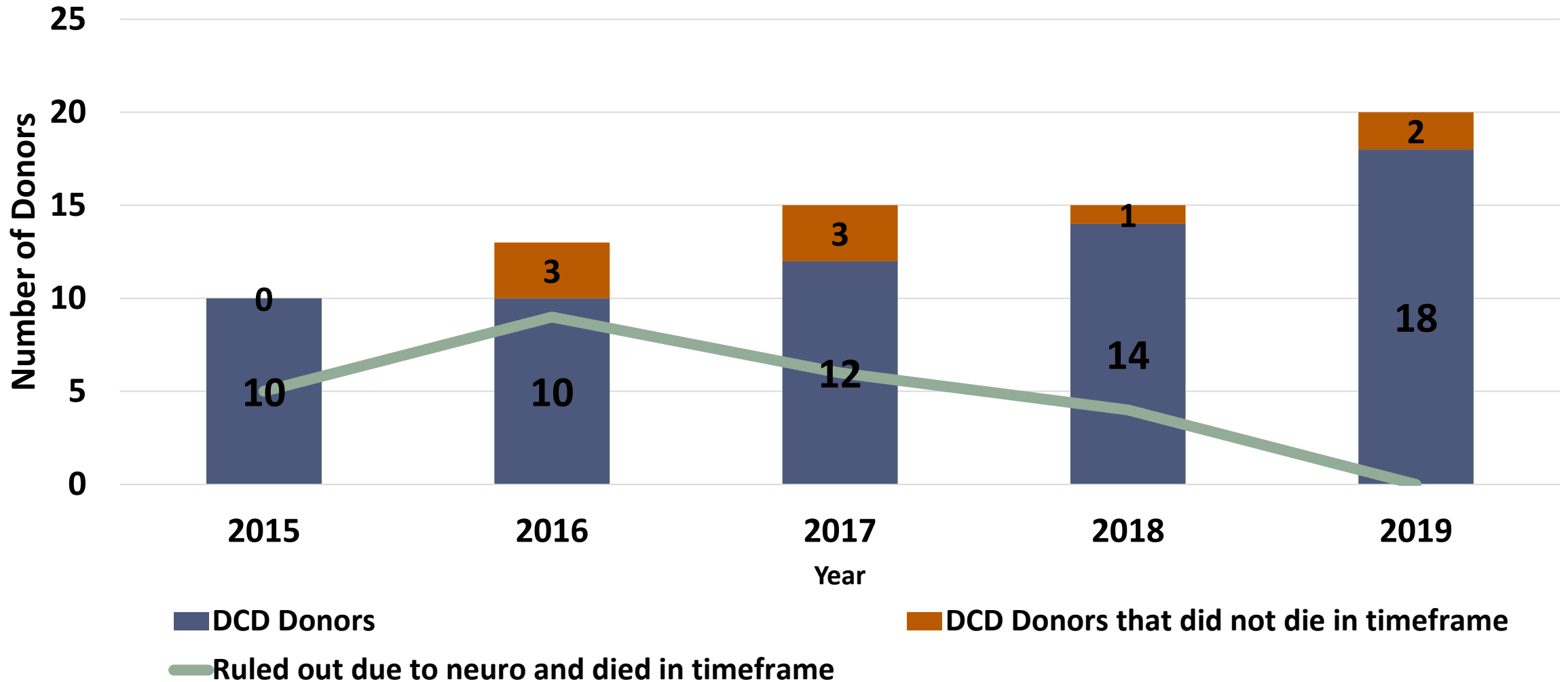
- 
- Serving 123 hospitals (82 CAH)
 - 55,857 square miles
 - 3.1 million population

Where did we start?

Percentage Donors from DCD Trends
2015 – 2019



Historical DCD Trends



Where is the Gap?



DONOR NETWORK

Phase 3

- Were they referred?
- Did we have time to evaluate?

Phase 2

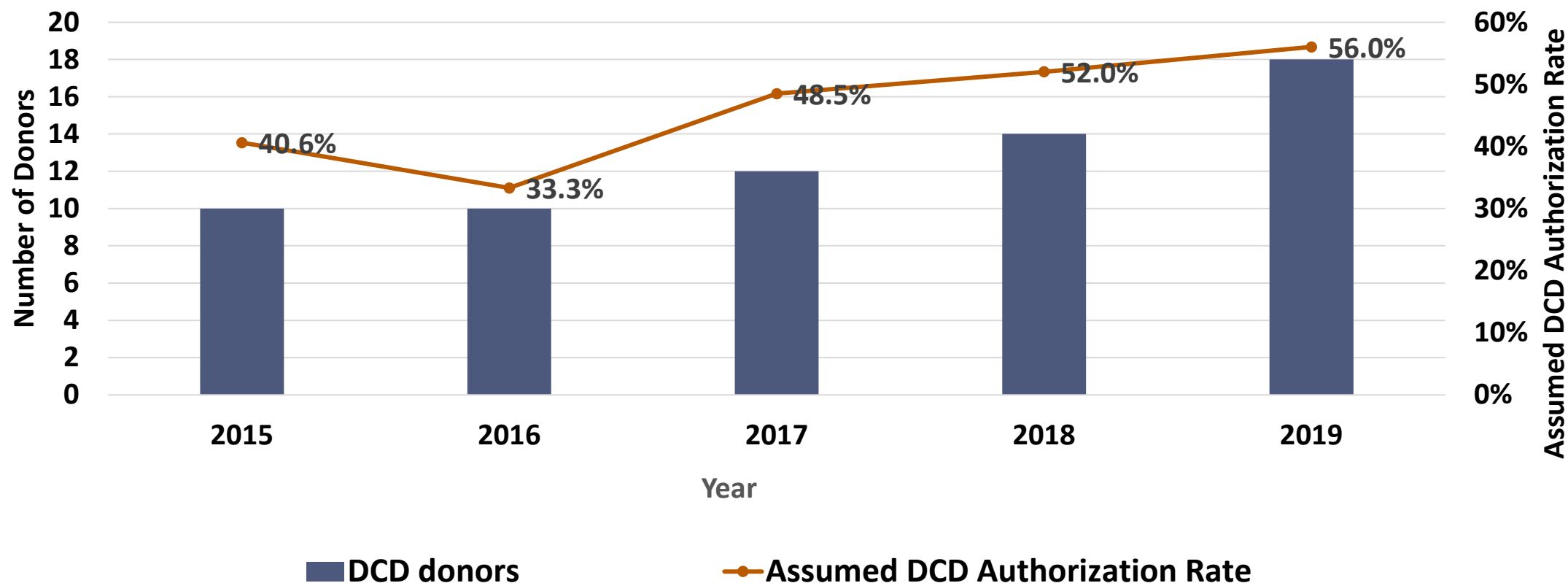
- Were they medically suitable?
- Were they likely to expire in timeframe?

Phase 1

- Was family approached and did we obtain authorization?

Approached and Authorized: *Changing the way, we talk about DCD*

Assumed DCD Donor - Authorization Rate



Where is the Gap?



DONOR NETWORK

Phase 3

- Were they referred?
- Did we have time to evaluate?

Phase 2

- Were they medically suitable?
- Were they likely to expire in timeframe?

Phase 1

- Was family approached and did we obtain authorization?

Who is a Suitable DCD Kidney donor?

[Landing Page](#) [Recovery](#) [Usage](#) [Documentation](#)

Deceased Donor Kidney Transplants by Center - 1/26/2019 - 1/23/2021

OPTN | ORGAN PROCUREMENT & TRANSPLANTATION NETWORK

Map Visualization

Transplants

2 273

Donor Recovery Date

1/26/2019 1/23/2021

Region

(All)

Center

(All)

Filters

Donor Type

DCD

Donor Age (years)

0 88

PHS Increased Risk

(All)

HBV NAT

(All)

HCV NAT

(All)

Hep B Surface

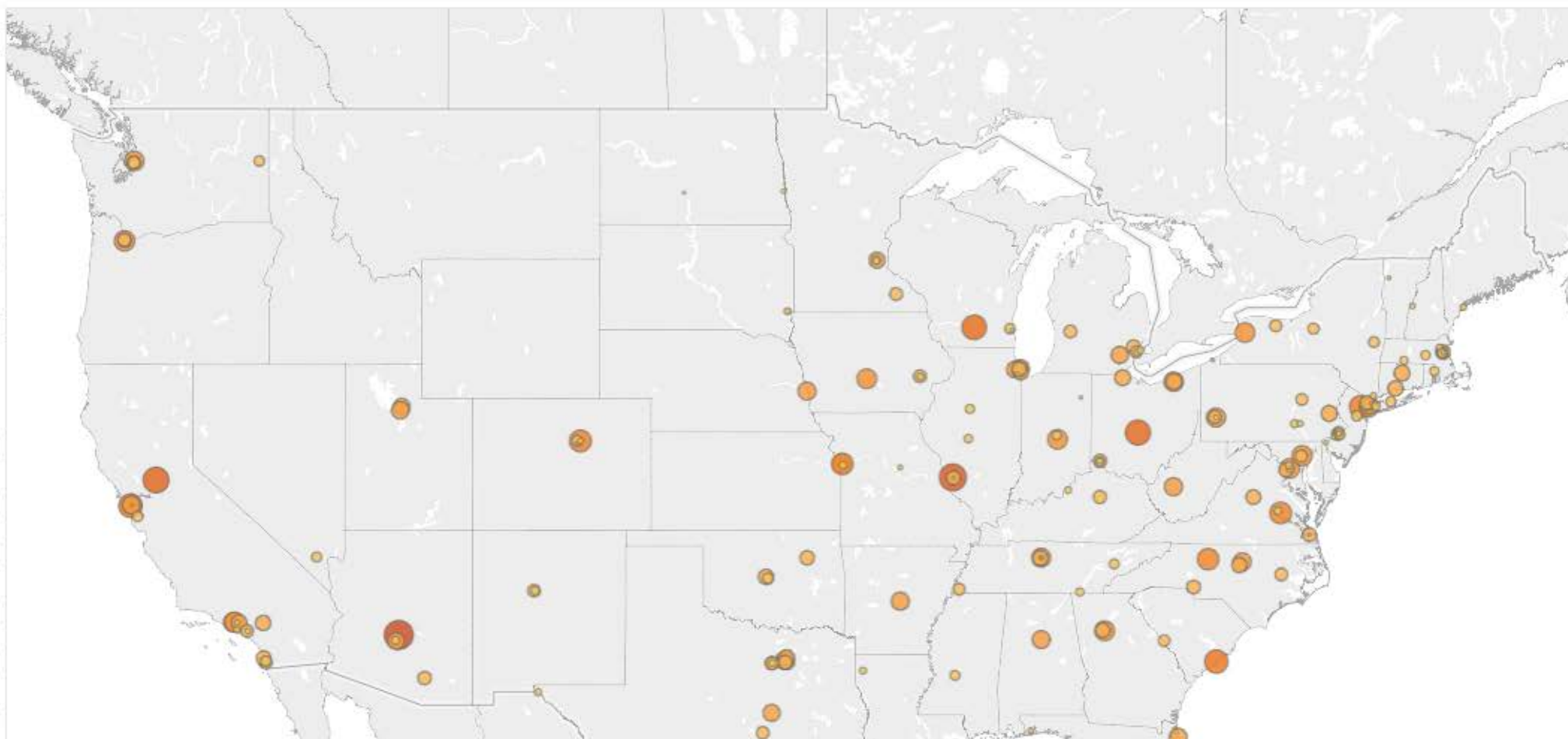
(All)

HCV Serology

(All)


Hep B Core

(All)



© Mapbox © OSM

Revised DCD Algorithm

 550 Madison Avenue North Liberty, IA 52317	Standard Work Title: SW-REF-13 DCD Algorithm		Reference Number: SW-REF-13	
	Effective Date: 09/08/2022	Last Review Date: 09/08/2022	Version Number: 6	
	Primary Editors: Director Organ Procurement Primary Consumers: ORS, QIS			

Purpose: Determine DCD suitability

Instruction:

- Any * require a 2nd clinical review (ORS or Max the Gift Leader) to rule out
- If renals are ruled out, screen for liver, lungs, and heart exclusive. If non-renal organ screened in, document the final code as the renal code+ and describe organs ruled in or out in comments field of ITx) (Example: M3+)

Age: 0 to 9 years

Rule Out Criteria	Final Code
Medically Ineligible (CMS)	NMS
Creatinine > 3.0	K1
CKD or HD/CRRT > 7 days	K2
Concerns about entire PMHx, clinical and/or current medical picture*	K3
Evaluated for DCD and deemed suitable	DCD+
Family approached for DCD donation	DCDP
Patient declared BD	BD

Age: 10 to 50 years


Rule Out Criteria	Final Code
Medically Ineligible (CMS)	NMS
CKD or HD/CRRT > 7 days	L1
Concerns about entire PMHx, clinical and/or current medical picture*	L3
Evaluated for DCD and deemed suitable	DCD+
Family approached for DCD donation	DCDP
Patient declared BD	BD

Age: 51 to 60 years

Rule Out Criteria	Final Code
Medically Ineligible (CMS)	NMS
History of HTN and DM and A1C > 7	M1
CKD or HD/CRRT > 7 days	M2
Admit Creatinine > 2.0 and trending up	M3
Current Creatinine > 3.0 and trending up	M4
Concerns about entire PMHx, clinical and/or current medical picture*	M8
Evaluated for DCD and deemed suitable	DCD+
Family approached for DCD donation	DCDP
Patient declared BD	BD

Age: 61 to 69 years

SW-REF-13 DCD Algorithm	Version: 6	Date Created: Not Set	Page 1 of 2
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 IOWA DONOR NETWORK 550 Madison Avenue North Liberty, IA 52317	Standard Work Title: SW-REF-13 DCD Algorithm		Reference Number: SW-REF-13	
	Effective Date: 09/08/2022	Last Review Date: 09/08/2022		Version Number: 6
	Primary Editors: Director Organ Procurement			
	Primary Consumers: ORS, QIS			

Rule Out Criteria	Final Code
Medically Ineligible (CMS)	NMS
CKD or HD/CRRT > 7 days	N1
History of HTN and DM	N2
History of DM and A1C > 7	N3
Admit or Current Creatine > 2.0 (clinical discretion)*	N4
Concerns about entire clinical and/or medical picture*	N6
Evaluated for DCD and deemed suitable	DCD+
Family approached for DCD donation	DCDP
Patient declared BD	BD

Age: 70 years and older

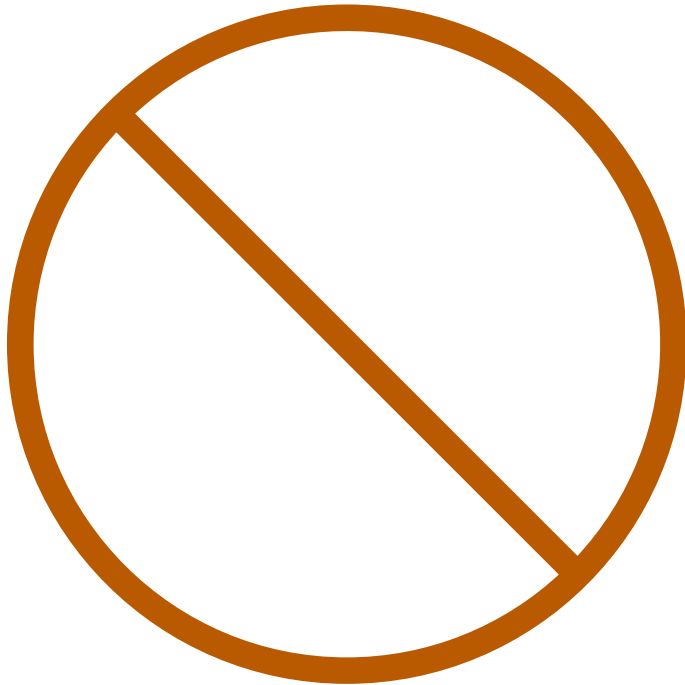
Rule Out Criteria	Final Code
Medically Ineligible (CMS)	NMS
Age 70 years old or older	AGE70

Non-Renal Screening

This section is used to screen vented organ referrals for liver-only and/or thoracic-only DCD donors. This screening is only completed only after a vented organ referral is screened out for DCD kidney donation.

Rule Out Criteria	
Liver	
<ul style="list-style-type: none"> Age > 69 years old BMI > 50 	
Lungs	
<ul style="list-style-type: none"> Age > 60 years old COPD/Emphysema, Pulmonary Fibrosis, Smoking Hx > 20 pack years (PPD x years smoked) ECMO 	
Heart	
<ul style="list-style-type: none"> Age > 50 years old DM (does not include DI) > 10 years, CHF, prior valve replacements or coronary artery bypass surgeries, any stent placements, pacemakers Cardiac Assist Devices (inclusive of ECMO, balloon pumps, impellas, etc.) 	

Donor-Death Prediction



Eliminate use of Donor-Death Prediction Tools*



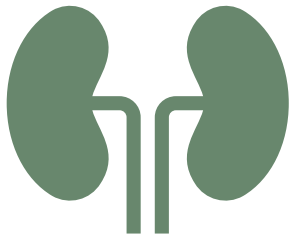
Eliminate emphasis of brain stem reflexes

* Hobeika, MJ, Glazner R, Foley DP, et al. A step toward standardization: Results of two National Surveys of Best Practices in Donation after Circulatory Death Liver Recovery and Recommendations from The American Society of Transplant Surgeons and Association of Organ Procurement Organizations. Clin Transplant. 2020;00:e14035. <https://doi.org/10.1111/ctr.14035>

Allocation Practice Changes



Aggressive Centers



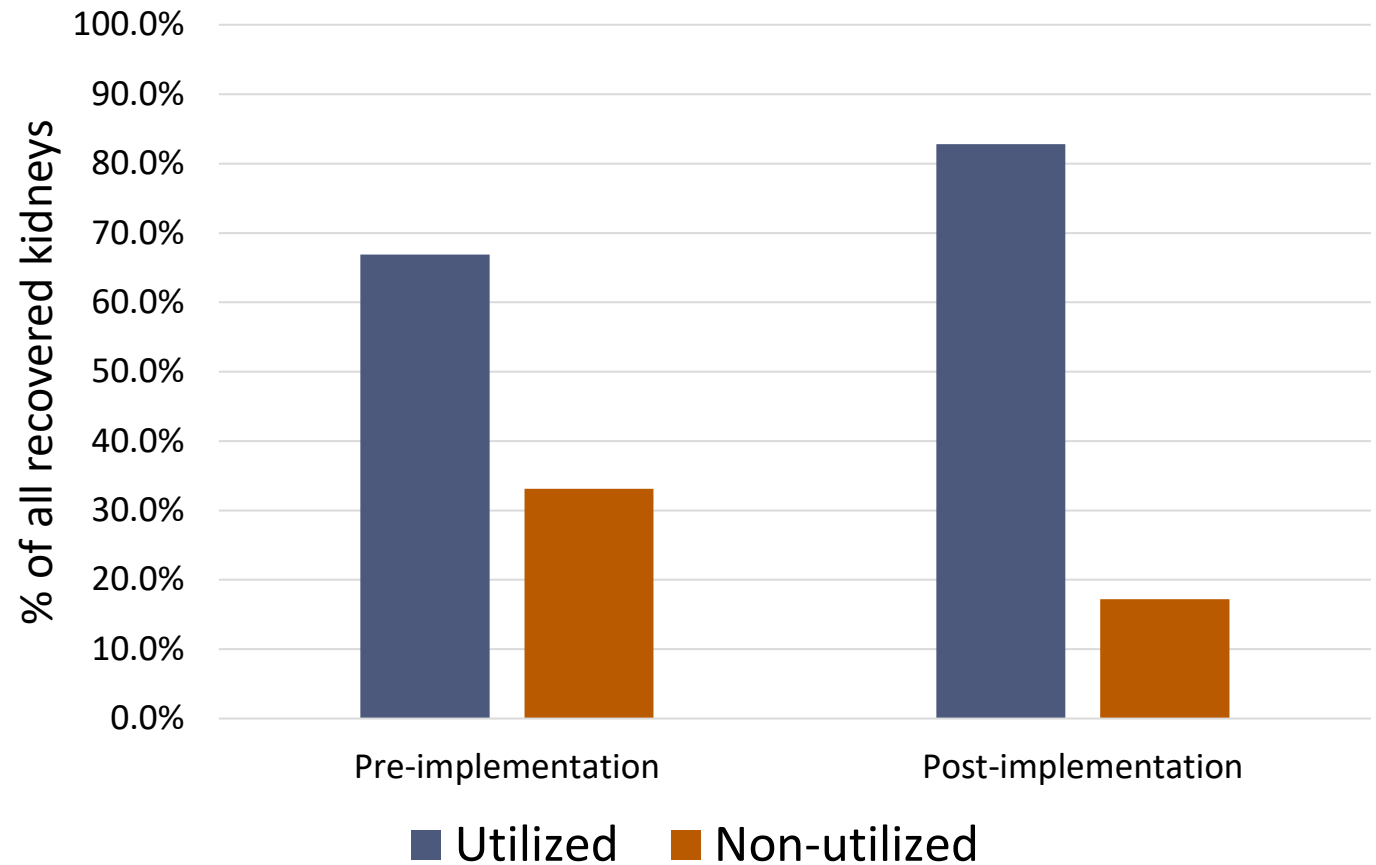
TAKEN Criteria for Kidneys

Outcomes: Utilization Rate vs Non- Utilization Rate

Pre-implementation timeframe:
07/01/21 – 12/31/21

Post-implementation timeframe:
02/01/22 – 07/31/22

Kidneys Utilized vs Non-utilized
as compared to Pre- and Post-
Implementation of TAKEN Criteria



Where is the Gap?



DONOR NETWORK

Phase 3

- Were they referred?
- Did we have time to evaluate?

Phase 2

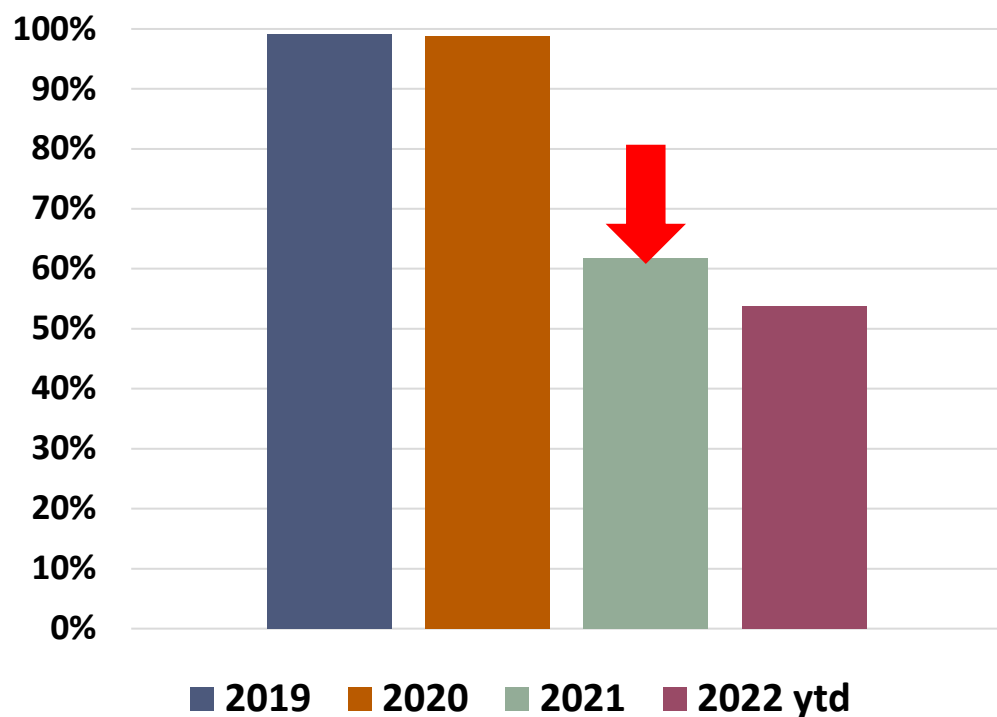
- Were they medically suitable?
- Were they likely to expire in timeframe?

Phase 1

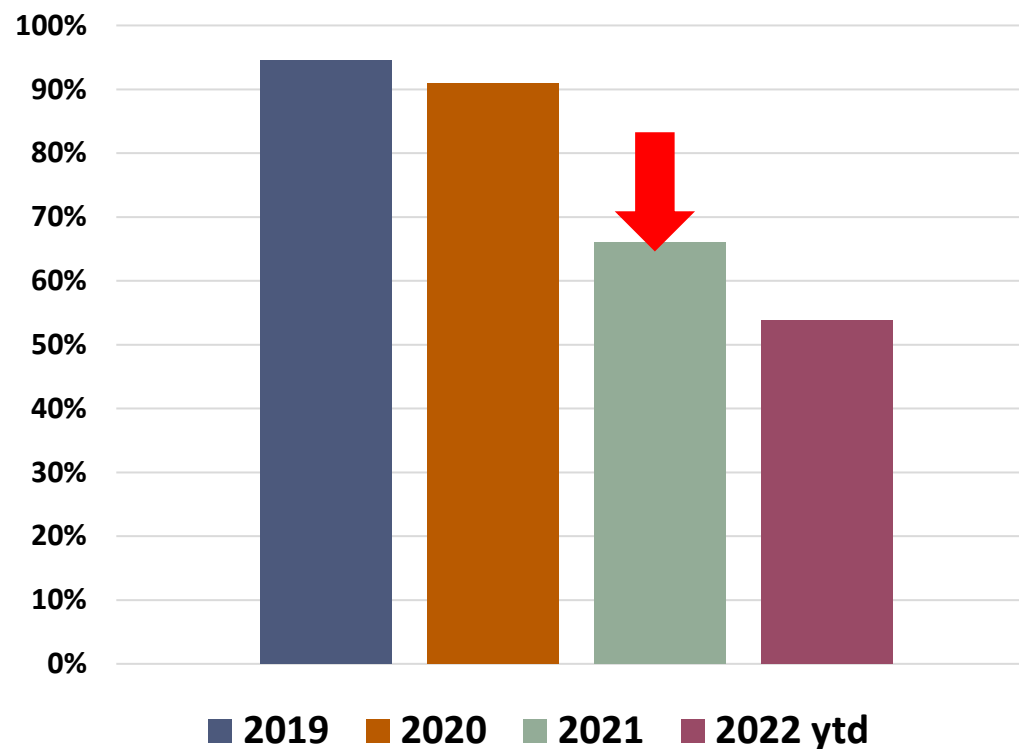
- Was family approached and did we obtain authorization?

Were they referred and timely?

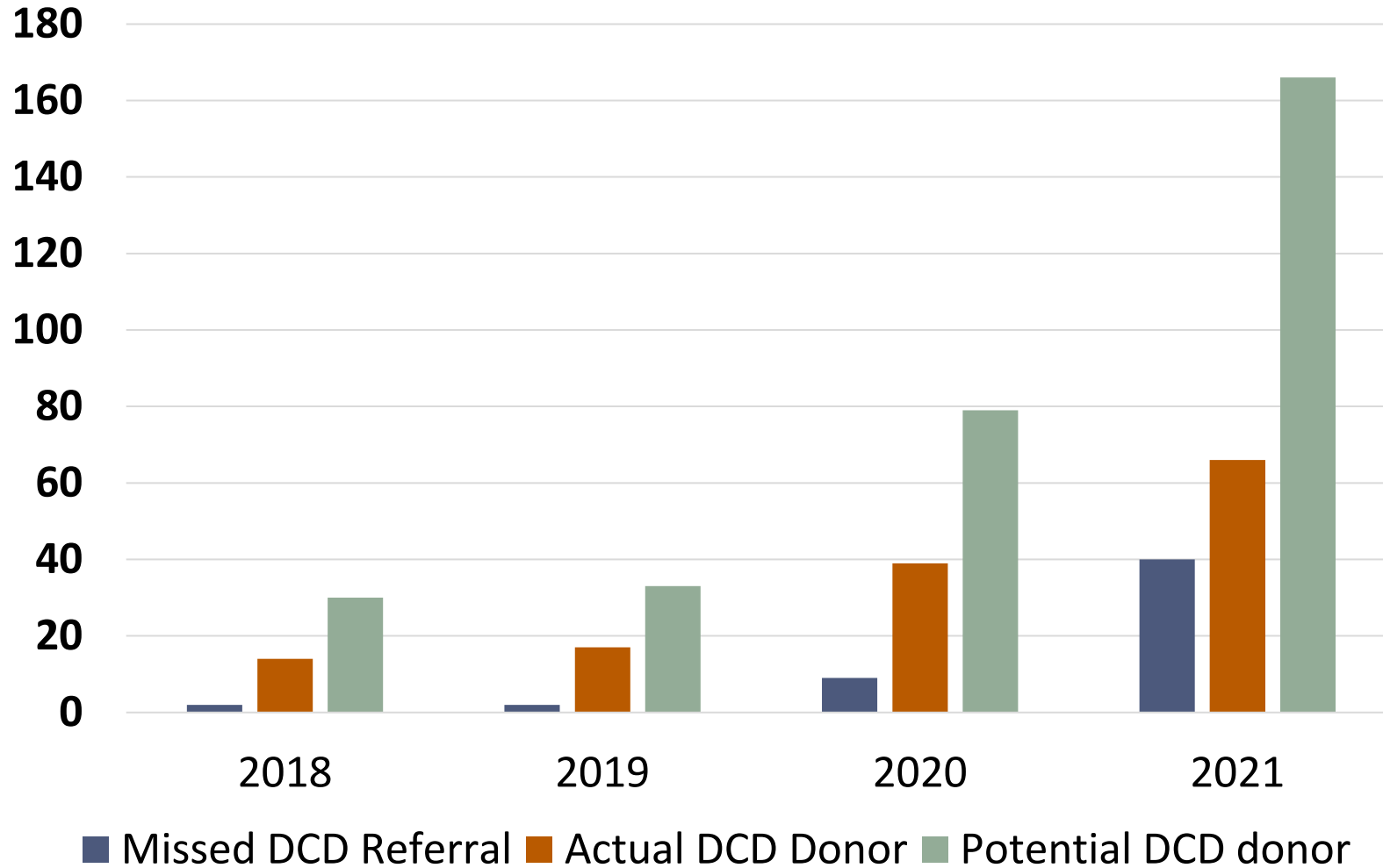
Vented Organ Referral Rate



Timely Referral Rate

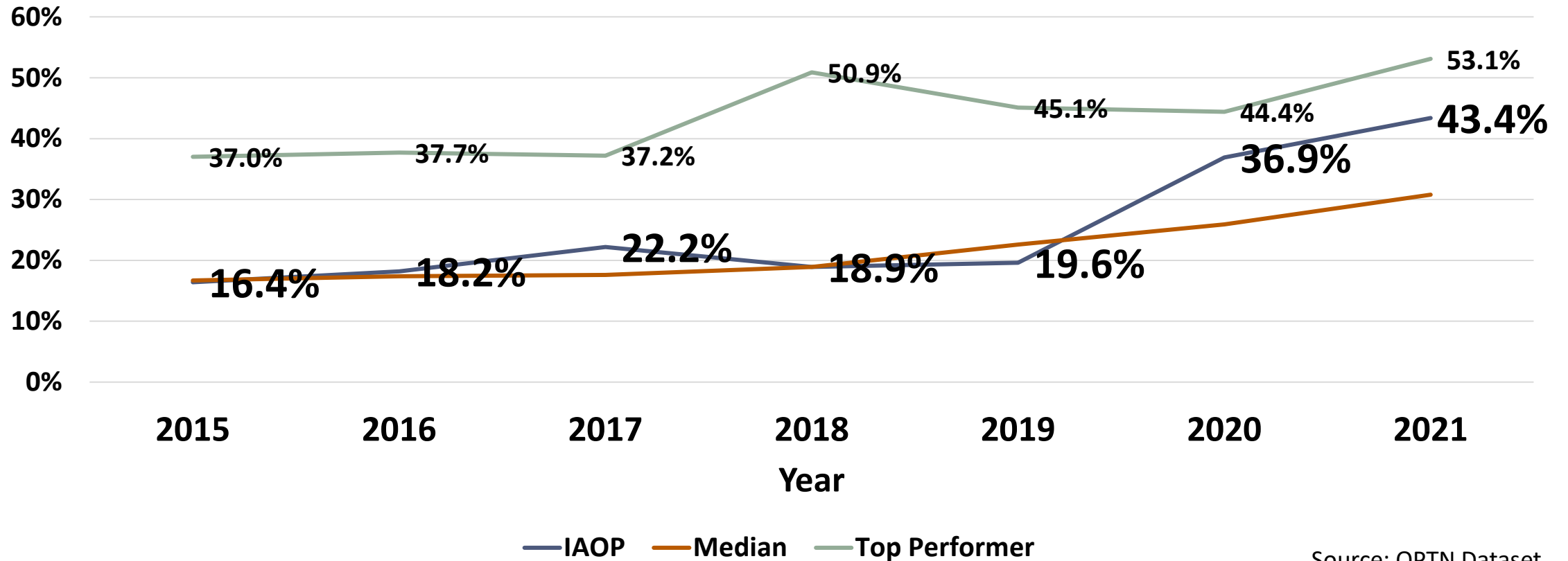


Impact

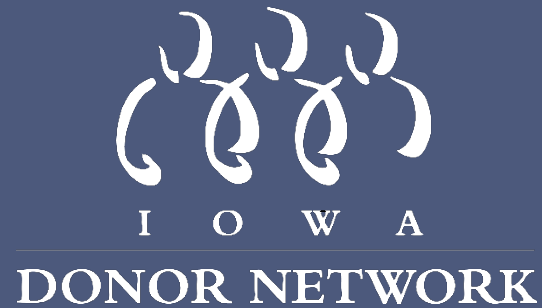


Where are we now?

Percentage Donors from DCD Trends
2015 – 2019



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A Special Thanks to Our Panelists



Christie Ryan

Director, Professional
Services and Regulatory
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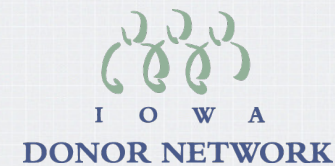
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Q&A

QUESTIONS & ANSWERS



Leadership & Engaged Learning in Organ Donation & Transplantation

2022 ADVANCEMENT LEARNING SERIES
