

OPTN

Organ Procurement &
Transplantation Network

Final Donation After Circulatory Death (DCD) Policy Proposal

Voting Item

PJ Geraghty

Immediate Past Organ Procurement Organization Committee Chair

8.20.26



Final Proposal Components

- ✓ Purpose of Proposal
- ✓ Timeline of Development
- ✓ Proposal for Board Consideration
- ✓ Implementation Resources and Proposed Timeline

Purpose of Proposal: Background

- DCD pathway organ donors have continued to increase annually, with DCD donors accounting for 53% of all deceased organ donors in year-to-date 2026
- Patterns of risk for patients entering the DCD pathway have been identified via special review undertaken by HRSA across multiple OPOs
- In response to the findings of the special review, in May 2025, HRSA issued a directive to the OPTN

Purpose of Proposal: Address Directive Requirements

- Improve and implement safeguards for patients entering the DCD pathway
 - Formalize a process for a pause in procurement efforts inclusive of appropriate stakeholder notifications, stakeholder collaboration after a pause is called, and required reporting of a pause
 - Describe the OPO's responsibility to ensure accurate neurological assessment and appropriate re-assessments
- Increase information regarding organ procurement shared with patient families
 - Define requirements for family education at the time of authorization
 - Empower families to call for a pause

Timeline of Development

- **May 28, 2025:** HRSA issued a directive to the OPTN regarding DCD procurement policies
- **July 17, 2025:** The HRSA Directive for OPTN DCD Policy Development Workgroup held its first meeting
- **Since July 2025:** The workgroup, OPO Committee, and BOD have held multiple meetings in support of this effort

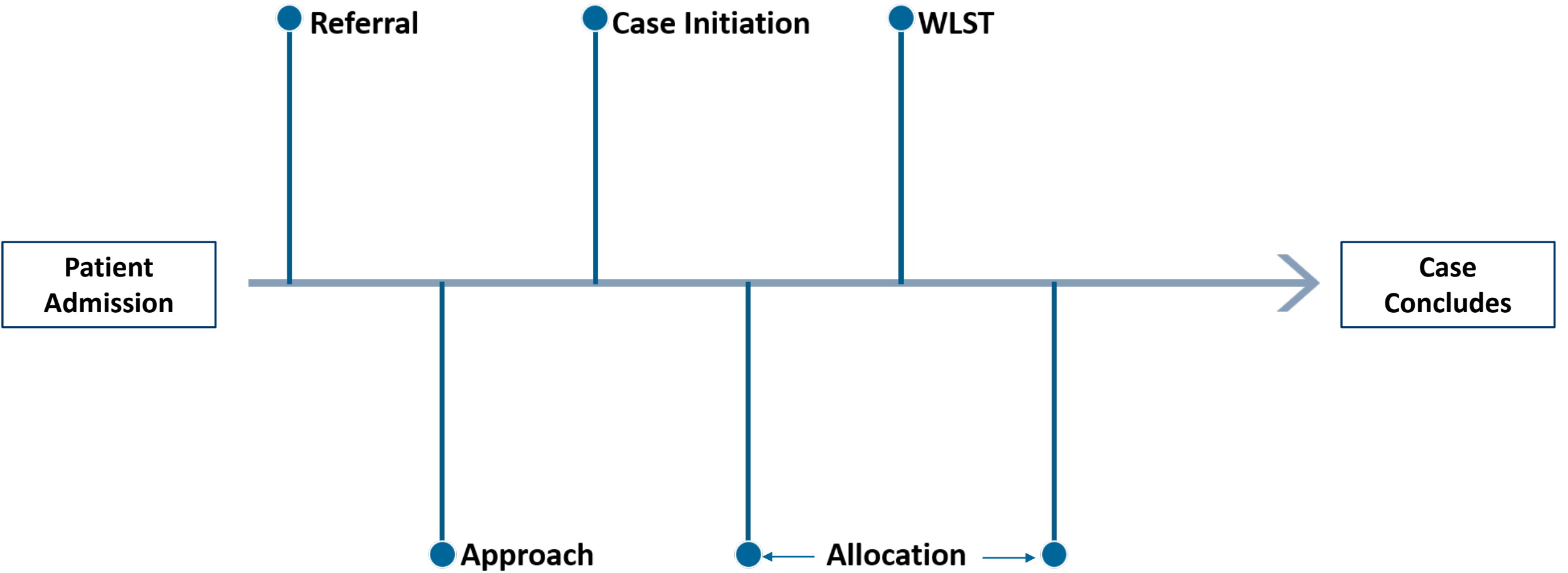
OPTN Meetings and Events Contributing to Policy Development

Date	OPTN Meeting or Event
July 17, 2025	Workgroup Meeting
August 14, 2025	Workgroup Meeting
September 11, 2025	Workgroup Meeting
October 9, 2025	Workgroup Meeting
November 20, 2025	Board of Directors Meeting
December 12, 2025	Board of Directors Meeting <i>Board vote to advance to public comment Vote tally: 31 approve, 1 reject, 0 abstain</i>
December 18, 2025 – January 18, 2026	Public comment period
January 30, 2026	Committee Leadership: Organ Procurement Organization (OPO) Committee ^a <i>Public comment review and policy revision begins</i>
March 2, 2026	<u>OPO Committee Leadership</u>
March 13, 2026	<u>OPO Committee Leadership</u>
March 18, 2026	<u>OPO Committee</u>
March 19, 2026	<u>Board of Directors Meeting</u>
March 27, 2026	<u>OPO Committee Leadership</u>
March 30, 2026	<u>Workgroup Meeting</u>
June 18, 2026	<u>OPO Committee Leadership</u>
June 25, 2026	<u>OPO Committee</u> <i>Committee vote to advance revised policy to Board Vote tally: 8 approve, 0 reject, 0 abstain</i>
June 25, 2026	<u>OPO Committee Leadership</u>
July 16, 2026	<u>Board of Directors Meeting</u>

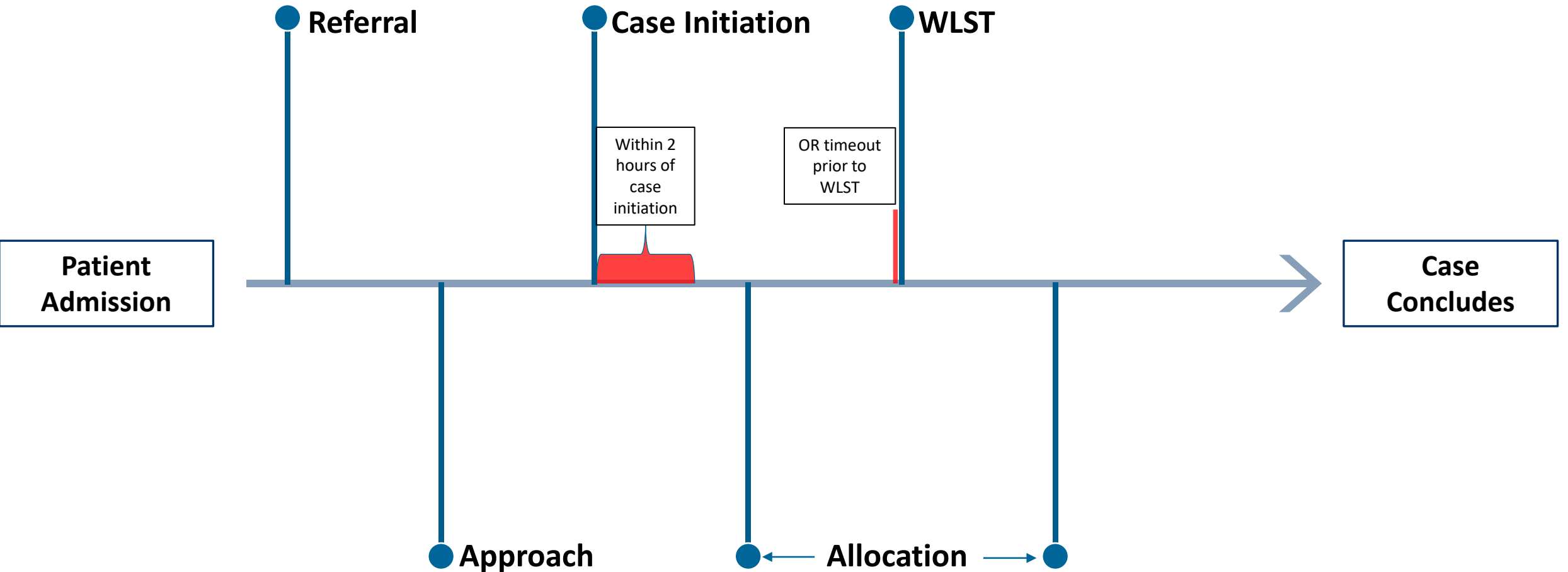
Proposal for Board Consideration

- Establish the Unplanned DCD Pause and associated required communications and reporting as a key patient safety mechanism:
 - OPOs must **establish and document a process** for requesting an Unplanned DCD Pause
 - OPOs must **notify defined stakeholders** of the process for requesting an Unplanned DCD Pause at specified case junctures
 - OPOs must **notify all applicable stakeholders** when an Unplanned DCD Pause is initiated
 - OPOs must **collaborate with the donor hospital** to determine if the patient remains appropriate for the DCD pathway when an Unplanned DCD Pause is called
 - OPOs must **report the Unplanned DCD Pause** and its resolution to the OPTN and select stakeholders

DCD Case Timeline



DCD Case Timeline with Required Notification



Proposal for Board Consideration

- Require **education on Unplanned DCD Pauses** for select OPTN members
 - Targeted education specialized to either OPO professionals or transplant centers and contracted third parties
- Require OPOs to **ensure accurate documentation** of neurological assessments
 - Escalate identified discordance in neurological assessments

Proposal for Board Consideration

- Require OPOs to **establish written protocols** specifying the information provided to the donor or donor's agent at the time of authorization
- Establish a minimum **five-minute waiting period** between circulatory cessation and initiation of organ recovery
- Require documentation and transplant program notification when donors declared dead by neurologic criteria **undergo organ recovery** using DCD protocols

Public Comment Analysis

Commenters voiced general support for the proposal with some concerns and/or requests:

- Explicit reporting requirements with visibility to the OPTN/HRSA
- Clearer definitions/guardrails for Unplanned DCD Pause
- Ensure OPOs practice within scope while ensuring accuracy of neurological assessments
- Foster OPTN member accountability for education regarding the Unplanned DCD Pause
- Clear delineation of roles and responsibilities and explicit limitation of OPO involvement in death determination and clinical care
- Specification of a minimum waiting interval between death pronouncement and organ procurement
- Make the proposed policy enforceable by the Secretary

Proposed Policy Changes Post-Public Comment

- Clarify the Unplanned DCD Pause definition
 - Unplanned DCD Pause can be called due to an unresolved difference of opinion
- Right-size scope of OPO responsibility to notify stakeholders of how to call a Pause
 - Inform stakeholders actively involved at the case-level how to request an Unplanned DCD Pause at no fewer than 2 timepoints: 1) within two hours of the time of case initiation and 2) at the timeout prior to initiating withdrawal of life-sustaining therapies
 - Inform third party stakeholders operating on the OPO's behalf
- Assure concordance in neurological assessments while still practicing within scope
 - Accurately document donor hospital neurological assessments with a mandatory escalation pathway for any identified discordance

Proposed Policy Changes Post-Public Comment

- Right-size scope of OPO external party Unplanned DCD Pause required education
 - Members must educate their own applicable staff and contracted third parties responsible for organ offer triage and acceptance
- Enforce a waiting period of no less than 5 minutes after circulatory cessation
- Expand the required reporting period for an Unplanned DCD Pause
 - Within 72 hours of initiation of the Unplanned DCD Pause or within 24 hours of resolution of the Unplanned DCD Pause, whichever comes first

Comments Not Resulting in Proposed Policy Change

Commenter concerns/requests outside of the scope of this proposal:

- Explicit requirements of NRP disclosure prior to authorization – *will be addressed in upcoming OPTN NRP proposed policy, which is expected to enter public comment soon*
- Further national standardization of DCD practices across OPOs and donor hospitals - *initial OPTN policy proposal supports any potential future standards development*
- Clarity how permanence of death is preserved when NRP is used – *addressed in upcoming OPTN NRP proposed policy*
- Define ethical boundaries of acceptable NRP practices – *addressed in upcoming OPTN NRP proposed policy*

Implementation Resources and Proposed Timeline

INFORMATIONAL

Implementation Resources and Proposed Timeline

*Committee Leadership Review
 **OPO Committee Feedback Requested

Resource	Audience	Location	Responsible Party	Date
Notice of Policy Implementation*	OPTN Members, Public	OPTN Website	HRSA	T- 90 Days
Webinar, Recorded*	OPO Professionals, Public	OPTN Website	HRSA, Committee	T- 75 days
Policy Webpage/Guidance & FAQ**	OPO Professionals, Public	OPTN Website	HRSA, Committee	Presented at September OPO Committee meeting

PENDING BOARD APPROVAL- POLICY STILL UNDER CONSIDERATION

Implementation Resources and Proposed Timeline Continued

*Committee Leadership Review
**OPO Committee Feedback Requested

Resource	Audience	Location	Responsible Party	Date
UNOS Connect Module*	Transplant Centers/Vendors with UNET login	UNET	UNOS	T- 45 Days
UNOS Connect Module*	OPO Professionals	UNET	UNOS	T- 45 Days
Final Policy Implementation Notice*	OPTN Members, Public	OPTN Website	HRSA	T- 30 Days

PENDING BOARD APPROVAL- POLICY STILL UNDER CONSIDERATION

Discussion and Questions



Placeholder- motion and vote
