

Transition to VPF for Patient Data Submission

Sponsoring Committee: OPTN Board Leadership

Effective Date: October 1, 2026

Purpose of Policy Changes

While the number of patients referred to OPOs is captured at the organizational level, it has not been consistently reported or analyzed at the national level, making it difficult to understand how patients move from that referral step to organ donation and how the process could be improved.

To address this gap, the Ventilated Patient Form (VPF), developed in response to a Department of Health and Human Services (HHS) Secretarial Data Directive, collects data on all patients who were ventilated during their terminal hospital admission, have a documented Pronouncement of Death, and were referred to the OPO by a hospital or identified by the OPO while onsite at the hospital, or found by the OPO upon death record review, thus entering the pathway for potential deceased organ donation.

The VPF is built to balance insight with efficiency and data protection:

- Data is submitted through OPOs, reducing burden on hospitals and clinical staff.
- It focuses only on deceased patients, supporting data minimization and avoiding unnecessary collection of sensitive information.
- Integration with an OPO's EMR helps streamline data submission, reduce burden, and avoid duplicate data capture.

To transition to the VPF, the OPTN is sunsetting the Death Notification Registration (DNR) form and the Monthly Donation Data Report: Reported Deaths (sometimes referred to as the DDDR). This change does not affect the Deceased Donor Registration (DDR) form, which will continue to be used.

Policies Affected

Policy Number	Policy Name
18.1	Data Submission Requirements

Summary of Changes

- OPOs must now submit the VPF to the OPTN.
- OPOs are no longer required to submit the DNR and DDDR.

Implementation

- **Patient referrals on or before Sept. 30, 2026:** Use the Death Notification Registration (DNR) form. OPOs must submit forms for referred patients for the month of September by Oct. 31, 2026.
- **Patient referrals on or after Oct. 1, 2026:** Use the Ventilated Patient Form (VPF). OPOs must submit forms for referred patients for October by Nov. 30, 2026.

Affected Policy Language

New language is underlined (example) and language that is deleted is struck through (example).

18.1 Data Submission Requirements

18.1.A Accurate Submission of Data OPTN: members must submit accurate data to the OPTN. Members must maintain documentation demonstrating the accuracy of all data submitted to the OPTN.

18.1.B Timely Submission of Certain Data Members: must submit data to the OPTN according to Table 18-1

Table 18-1: Data Submission Requirements

The following member:	Must submit the following instruments to the OPTN:	Within:	For:
Histocompatibility Laboratory	<i>Donor Histocompatibility (DHS)</i>	60 days after the DHS record is generated	Each living and deceased donor
Histocompatibility Laboratory	<i>Recipient Histocompatibility (RHS)</i>	60 days after the transplant hospital removes the candidate from the waiting list because of transplant	Each heart, intestine, kidney, liver, lung, or pancreas, or covered VCA transplant recipient typed by the laboratory
<u>OPO</u>	<u><i>Ventilated Patient Form (VPF)</i></u>	30 days after the end of <u>the month in which a donor hospital reports a death to the OPO or the OPO identifies the death through a death record review</u>	Each patient who has a <u>documented Pronouncement of Death, and was ventilated during their terminal hospitalization, and was referred to the OPO by a</u>

The following member:	Must submit the following instruments to the OPTN:	Within:	For:
			<u>hospital or identified by the OPO while onsite at the hospital, or found by the OPO upon death record review as required by 42 CFR 486.348(b).</u>
OPOs	<i>Death Notification Registration (DNR)</i>	30 days after the end of the month in which a donor hospital reports a death to the OPO or the OPO identifies the death through a death record review	All imminent neurological deaths and eligible deaths in its DSA
OPOs	<i>Monthly Donation Data Report: Reported Deaths</i>	30 days after the end of the month in which a donor hospital reports a death to the OPO	All deaths reported by a hospital to the OPO
Allocating OPO	<i>Potential Transplant Recipient (PTR)</i>	30 days after the match run date by the OPO or the OPTN	Each deceased donor heart, intestine, kidney, liver, lung, pancreas, or covered VCA that is offered to a potential recipient
Host OPO	<i>Donor Organ Disposition (Feedback)</i>	5 business days after the procurement date	Individuals, except living donors, from whom at least one organ is recovered
Host OPO	<i>Deceased Donor Registration (DDR)</i>	60 days after the donor organ disposition	All deceased donors

The following member:	Must submit the following instruments to the OPTN:	Within:	For:
		(feedback) form is submitted and disposition is reported for all organs	
Recovery Hospitals	<i>Living Donor Feedback</i>	The time prior to donation surgery	Each potential living donor organ recovered at the hospital
Recovery Hospitals	<i>Living Donor Feedback</i>	72 hours after the donor organ recovery procedure	Any potential living donor who received anesthesia but did not donate an organ or whose organ is recovered but not transplanted into any recipient
Recovery Hospitals	<i>Living Donor Registration (LDR)</i>	90 days after the recovery hospital submits the living donor feedback form	Each living donor organ recovered at the hospital
Recovery Hospitals	<i>Living Donor Follow-up (LDF)</i>	90 days after the six-month, 1-year, and 2-year anniversary of the donation date	Each living donor organ recovered at the hospital This does not apply to domino donor and non-domino therapeutic donor organs.
Transplant Hospitals	<i>Organ Specific Transplant Recipient Follow-up (TRF)</i>	Either of the following: 90 days after the six-month and annual anniversary of the transplant date until the recipient's death, graft failure, or planned graft	Each recipient followed by the hospital

The following member:	Must submit the following instruments to the OPTN:	Within:	For:
		removal of a uterus 14 days from notification of the recipient's death or graft failure	
Transplant Hospitals	<i>Organ Specific Transplant Recipient Registration (TRR)</i>	90 days after transplant hospital removes the recipient from the waiting list	Each recipient transplanted by the hospital
Transplant Hospitals	<i>Liver Post-Transplant Explant Pathology</i>	60 days after transplant hospital removes candidate from waiting list	Each liver recipient transplanted by the hospital
Transplant Hospitals	<i>Waiting List Removal for Transplant</i>	1 day after the transplant	Each heart, intestine, kidney, liver, lung, pancreas, or covered VCA recipient transplanted by the hospital
Transplant Hospitals	<i>Recipient Malignancy (PTM)</i>	30 days after the transplant hospital reports the malignancy on the transplant recipient follow-up form	Each heart, intestine, kidney, liver, lung, or pancreas recipient with a reported malignancy that is followed by the hospital.
Transplant Hospitals	<i>Transplant Candidate Registration (TCR)</i>	90 days after the transplant hospital registers the candidate on the waiting list	Each heart, intestine, kidney, liver, lung, pancreas or covered VCA candidate on the waiting list or recipient transplanted by the hospital