

Guidance Document

Physical Examination Birth Mothers

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AATB GUIDANCE DOCUMENT Physical Examination Birth Mothers

I. <u>INTRODUCTION</u>

A. History and Purpose

Throughout the birth tissue donation industry, different processes have been established to satisfy the requirement of having a current physical examination documented as part of donor-eligibility determination.

The purpose of a physical examination of a living donor is to assess for physical signs of a relevant communicable disease and for signs of any risk factor for such a disease.

This Guidance Document provides direction on the various ways a physical examination can be obtained for birth mothers that satisfies regulatory requirements, as physical exam findings relevant to tissue donation may include different factors than what may be clinically relevant to providers evaluating women for delivery found on an admission H&P. This document assists with understanding of standard prenatal care and the documents that are typically generated during prenatal course and delivery. While both AATB and FDA require documentation and evaluation of the health and physical status of the newborn as part of the donor-eligibility determination, that is outside the scope of this document.

These options are discussed and outlined in this document, along with examples of forms that may be used to satisfy the physical examination requirement for the birth mother. It is up to each individual bank's medical director to determine exactly which condition or finding would be a contraindication to donation. The forms contained in this document provide examples that can be used by banks to develop their own robust forms and procedures.

Refer to AATB Standards:

D3.000 Informed Consent

D4.100 Donor Screening

D4.130 Physical Examination

D4.140 Donor Risk Assessment Interview (DRAI)

D4.141 Family History and Genetic Background

D4.150 Relevant Medical Records Review

D4.230 Required Infectious Disease Tests

D5.720 Delivery and Post-Delivery Records

F1.110 Records for Review

F1.120 Infectious Disease Risk Review

Appendix II: Criteria for Preventing Transmission of RCDADs Through Transplantation of Human Tissue

B. Definitions and Acronyms

Acquisition: The point after delivery at which tissue is under the control of the tissue bank.

Attestation: A written declaration that formally certifies that something exists or is the case.

Birth Tissue (BT): Gestational tissue donated at the time of delivery of a living newborn. This includes placenta, chorionic membrane, amniotic membrane, placental/chorionic disc, umbilical veins, and umbilical cord tissue. While Wharton's jelly and amniotic fluid are generally considered to fall in the category of birth tissue, FDA has stated that amniotic fluid is not, by definition as found within 21 CFR 1271.3, an HCT/P. Wharton's jelly is considered a "351 HCT/P" by the FDA, as most uses of this tissue are for non-homologous, and it's more than minimally manipulated.

Designee: A medical professional as an alternate signer (RN, LPN, DO), who is involved in patient care and is qualified to perform physical examinations and review records, and due to those qualifications may sign an attestation regarding the birth mother's physical examination/general health.

Directed Physical Examination: An examination of only parts of the body that are necessary to further evaluate for Relevant Communicable Disease Agents or Diseases based upon relevant medical history and review of available records.

HIPAA: Health Insurance Portability and Accountability Act. Mandates industry-wide standards for health care information and requires the protection and confidential handling of protected health information.

Physical Examination Checklist: A specified listing of the established elements of a birth mother's physical examination.

Physical Examination of a Birth Mother: A documented evaluation of a birth mother's body to determine whether there is evidence associated with Relevant Communicable Disease Agents or Diseases and to determine the overall health of the birth mother.

Physician: A licensed medical doctor (MD) or doctor of osteopathy (DO) involved in the birth mother's care, either during her prenatal course or during admission for delivery.

RCDAD(s): Relevant Communicable Disease Agents or Diseases. A potentially infectious disease agent that may pose a risk of transmission to recipients of, or those who come in contact with, tissues. These disease agents/diseases: have sufficient incidence and/or prevalence to affect the potential donor population or may be accidentally or intentionally released in a manner to place potential donors at risk for infection; could be fatal, life-threatening, result in permanent impairment, or necessitate medical or surgical intervention to preclude permanent impairment; and, for which appropriate screening measures have been developed or an appropriate screening test for donor specimens has been FDA-licensed, cleared, or approved, and is available.

RCDADs applicable to all tissue donations include the following:

- Human immunodeficiency virus (HIV), types 1 and 2
- Hepatitis B virus (HBV)
- Hepatitis C virus (HCV)
- Human transmissible spongiform encephalopathy (TSE); including Variant Creutzfeldt-Jakob disease (CJD)
- *Treponema pallidum* (syphilis)
- Sepsis
- West Nile virus
- Zika virus infection
- Vaccinia (virus used in Smallpox vaccine)

Other testing/screening performed on BT donors either for purpose of donation or during prenatal course include:

- Human T-lymphotropic virus (HTLV), types I and II (otherwise required for donors of leukocyte-rich cells and tissue)
- Chlamydia trachomatis (CT) (otherwise required for donors of reproductive tissue)
- Neisseria gonorrhea (NG) (otherwise required for donors of reproductive tissue)

The following is a list of additional communicable disease agents and diseases that may be transmissible by HCT/Ps. Refer to current FDA Guidance and AATB Standards for requirements or updates on current RCDADs.

- Rabies
- Ebola virus disease
- Encephalopathies
- Mycobacterium tuberculosis
- Hansen's disease (leprosy)
- Systemic mycosis

Relevant Medical Records: A collection of documents including, but not limited to, a current donor risk assessment interview, physical examination or attestation of examination, laboratory test results performed during prenatal course, laboratory test results at time of delivery as is required for tissue donation, as well as information obtained from any source or records which may pertain to donor eligibility regarding high-risk behaviors, clinical signs and symptoms for any RCDAD, and/or treatments related to medical conditions suggestive of such risk.

Tissue Bank: An entity that provides or engages in one or more services involving tissue from living or deceased persons for transplantation purposes. These services include obtaining authorization and/or informed consent, assessing donor eligibility, recovery, collection, acquisition, processing, storage, labeling, distribution and dispensing of tissue.

Vertical Transmission: An infection caused by pathogens (including bacteria and viruses) that can be transmitted from the mother to an embryo, fetus, or baby during pregnancy or childbirth.

- ACOG: American College of Obstetricians and Gynecologists
- ASA: American Society of Anesthesiologists
- CT: Chlamydia trachomatis
- GBS: Group B streptococcus
- H&P: History and physical examination
- HPV: Human papilloma virus
- APGAR: Activity/muscle tone, Pulse/heart rate, Grimace, Appearance, Respiration/breathing
- CBC: complete blood countNG: *Neisseria gonorrhea*
- OB: Obstetrics
- PAP: Pap smear, also called Pap test and Papanicolaou test
- ROS: Review of Systems
- SOPM: Standard Operating Procedure Manual

II. <u>BACKGROUND</u>

A. Documentation generated during typical prenatal care:

This section provides information on typical prenatal care provided to pregnant women. While documentation of this care varies with each OB practice, this section is meant to provide information as to what records are typically generated by OB providers.

While it is recommended that the tissue bank obtain all these prenatal records, the tissue bank should establish which records are required. In the case where a pregnant woman may not have established care at the beginning of her pregnancy, the tissue bank should also establish an acceptable length of time of prenatal care in their SOPs.

This table lists out the normal visits to OB care provider:

Between weeks 1-32:	Between weeks 32-37:	At 36+ weeks:
Routine OB visit once a	Routine OB visit every 2 weeks	Routine weekly OB visits,
month		with cervical exam each time
The first OB visit typically	At 35/36 weeks: r/v Group B	NG and CT screening if the
confirms family history,	Strep (GBS) swab.	patient has no risk factors.
standard prenatal labs		
(HIV, HBV, syphilis and	Repeat NG/CT, syphilis, HIV	CDC guidelines state NG/CT
screening for NG/CT) are		screen performed when the
taken at this time.		woman is <25yo, or ≥25yo
		WITH risk factors.
Full physical		
examination		ACOG recommendations: All
		pregnant women should be
PAP if indicated, (based		screened for NC/CT and
on the medical judgement		syphilis if the woman is

of the attending OB	<25yo, or ≥ 25yo WITH risk
physician or their	factors.
preferred general	
practice).	
Genetic screening – if	
indicated and if birth	
mother consents to testing.	

In conjunction with these visits, pregnant women are screened and/or tested for vertically transmitted diseases by their OB providers. The acronyms commonly seen in OB records are TORCH or CHEAPTORCHES, for those bacteria, viruses, and other organisms that could be passed from mother to child. During patient visits, these diseases are discussed with the patient to determine if there is an exposure risk, and testing may be performed. No further action is generally taken when test results are negative; if test results are positive, treatment is prescribed, if available. These acronyms are discussed in the table below:

		Screened, Tested, or Treated:
T	Toxoplasmosis	Screened for exposure risk at new OB visit and advised how to avoid exposure. Example, told not to change cat litter.
o	Other infections: Parvovirus, Coxsackievirus, Chickenpox, CT, NG, HIV, Lyme Disease, Syphilis, Zika	CT, NG, HIV, Syphilis – testing performed. Zika: travel history discussed. Lyme Disease – only tested if exposure concern.
R	Rubella	Tested to show immunity at new OB visit. Vaccination offered post-partum.
С	Cytomegalovirus	Only tested if exposure concern. Example, working with small children, symptoms such as rash or viral illness, or abnormal prenatal ultrasound results which may prompt further work-up.
Н	Herpes simplex virus	Screened with patient if infection history. Some OB offices test for seropositivity. Suppressant prescribed at week 36 if needed.

	Chickenpox and shingles	Screened, Tested, or Treated:	
C		Infection history discussed and Varicella titers drawn at new OB visit. Vaccination offered post-partum.	
Н	Hepatitis, B and C	Hepatitis B and C tested.	
E	Enteroviruses	Patients are rarely ever tested, and only worked up if symptoms of nausea/vomiting persist.	

A	AIDS (HIV infection)	Tested.	
P	Parvovirus B19	Abnormal prenatal ultrasound results which may prompt further work-up.	
Т	Toxoplasmosis	Screened for exposure risk at new OB visit and advised how to avoid exposure. Example, told not to change cat litter.	
O	Other Infections (Group B Streptococcus, Listeria, Candida, Lyme disease)	Group B strep tested at ~ 36 weeks. Candida treated if symptoms. Lyme disease tested if exposure and/or symptoms. Listeria – patients advised to avoid exposure.	
R	Rubella	Tested to show immunity at new OB visit. Vaccination offered post-partum.	
C	Cytomegalovirus	Only tested if exposure concern. Example, working with small children, or has symptoms such as rash or viral illness, or abnormal prenatal ultrasound results which may prompt further workup.	
Н	Herpes simplex virus	Screened with patient and suppression medication prescribed – this varies by OB provider if patient is sero positive only and never had an outbreak.	
Е	Everything else sexually transmitted (gonorrhea, <i>Chlamydia</i> infection, <i>Ureaplasma urealyticum</i> , human papillomavirus)	NG and CT tested during OB visits. Genital tract infections are treated if patient is showing symptoms. HPV is screened via a PAP smear. Condylomas can be removed as necessary, or often treated postpartum.	
S	Syphilis	Testing performed.	

B. Records from Hospital Admission

Once a woman is admitted to hospital to deliver, the following records are typically generated:

H&P: H&P exam performed or attested to within 24-hours of admission. Included in this document is a standard physical examination of a woman upon admittance to the hospital who is preparing to give birth. This H&P exam includes a standard ROS and a review or evaluation of general anatomy. This ROS and anatomical review may cover:

Vitals
Constitutional symptoms
Eyes, Ears, Mouth, Nose, Throat
Cardiovascular
Respiratory
Gastrointestinal
Genitourinary
Musculoskeletal

Integumentary
Neurological
Psychiatric
Endocrine
Hematologic/lymphatic
Allergic/immunologic

Anesthesia evaluation: If a c-section is performed, or an epidural or spinal anesthesia are provided for a vaginal birth, the birth mother will be seen by an anesthesiologist. The anesthesiologist typical confirms information on the H&P, and the anesthesiology evaluation would include any updated information obtained, along with the physical evaluation performed by the anesthesiologist.

The ASA classification (below table) used by anesthesiologists provides information relevant to the health of the woman:

ASA I	A normal healthy patient: Healthy, non-smoking, no or minimal alcohol use	
	A patient with a mild systemic disease - Mild diseases only without substantive functional limitations. Examples include (but not limited to): current smoker,	
ASA II	social alcohol drinker, pregnancy, obesity (30 < BMI < 40), well-controlled	
	DM/HTN, mild lung disease.	
A patient with a severe systemic disease - Substantive functional limitations; or more moderate to severe diseases. Examples include (but not limited to): properties of controlled DM or HTN, COPD, morbid obesity (BMI ≥40), active hepatitis, alcohol dependence or abuse, implanted pacemaker, a moderate reduction of ejection fraction, ESRD undergoing regularly scheduled dialysis, premature PCA < 60 weeks, history (>3 months) of MI, CVA, TIA, or CAD/stents.		
ASA IV	A patient with severe systemic disease that is a constant threat to life - Examples include (but not limited to): recent (< 3 months) MI, CVA, TIA, or CAD/stents, ongoing cardiac ischemia or severe valve dysfunction, severe reduction of ejection fraction, sepsis, DIC, ARD or ESRD not undergoing regularly scheduled dialysis	

If used, this ASA classification can be found within the anesthesia evaluation records.

<u>Delivery Record</u>: Documents date and time of delivery, initial evaluation including information on health status of the newborn, documented APGAR score, and other information such as amniotic fluid characteristics.

<u>Dictated Operative Report</u>: This document is dictated and signed by the physician and includes both pre-op and post-op diagnosis and any intra-operative events.

<u>Lab Results:</u> Blood is drawn on admission to hospital for CBC – which may include further HIV and syphilis testing.

The Tissue Bank shall establish minimum requirements for obtaining available hospital generated relevant medical records (J1.200).

III. Options for Tissue Banks to Document a Physical Examination of a Birth Mother

This section addresses three acceptable options to obtain a robust physical examination of a birth mother. Whichever approach is used to document a physical examination, this does not absolve the tissue bank of obtaining all relevant records. It should be noted that AATB and FDA require evaluation of the health and physical status of the newborn, but that is outside the scope of this document.

A. Physical Examination Performed for the Purpose of Donation

This option addresses the performance and documentation of a physical examination specifically for the purpose of donation. regardless as to whether there is already a physical examination performed for birth event.

Tissue banks should develop SOPs that cover:

- Language in the informed consent record, regarding the individual's consent for this physical examination specifically performed for the purpose of donation and is not part of her prenatal care or any examination performed during admission.
- How to disseminate any physical examination findings, including any required notification
 to donor's treating medical personnel, if the examination was performed by an auxiliary
 medical professional not directly involved in the individual's care.
 - O Providers should be made aware that there may be other documentation regarding an individual's general health generated through tissue donation process.
 - O Language should be included in contracts with providers and/or hospitals that addresses who completes physical examination for the purpose of donation.
 - O Documented training for those medical personnel performing this physical examination for the purpose of donation.

An example form documenting physical examination performed for the purpose of donation is below. (Tissue banks may also develop their own form.)

PHYSICAL EXAMINATION of BIRTH MOTHER		
Vital Signs within normal limits:	□ Yes □ No	
Constitutional Healthy appearing	☐ Yes ☐ No	
Eyes – conjunctiva normal, sclera white	☐ Yes ☐ No	
Neck – no lymphadenopathy present	☐ Yes ☐ No	
Breasts – no skin changes, no discharge, no masses on palpation	☐ Yes ☐ No	
Gastrointestinal Abdominal Examination – non-tender to palpation, normal bowel sounds, no masses Liver and Spleen – no hepatomegaly present, non-tender to palpation Hernias – no hernias present	□ Yes □ No	
Genitourinary External Genitalia – normal appearance, no unusual discharge Vagina – no unusual discharge, no masses Bladder – non tender to palpation Urethra – structural support normal Cervix – non-tender to palpation Uterus – non-tender to palpation, no masses present Perineum – no lesions present Anus – no lesions, no masses	□ Yes □ No	
Lymphatic – No lymphadenopathy present	☐ Yes ☐ No	
Skin – No rashes, no lesions, no areas of discoloration, no unexplained jaundice	☐ Yes ☐ No	
Are there any other physical evidence/signs of a current infection, or an unexplained rash/petechiae, fever, skin lesions, swollen lymph nodes, or others symptoms of a virus?	□ Yes □ No	
Are there physical evidence/signs of any sexually transmitted diseases (rash genital ulcers, herpes simplex, chancroid genital lesions, etc.) or syphilis?	□ Yes □ No	
Is there evidence of needle tracks or other non-medical injection site?	□ Yes □ No	
Findings and Other Comments:		
Performed by (signature and printed name): Date:		
Title: RN/LPN Other		

B. Attestation of Physical Examination

This option outlines the performance of an attestation, where a physical examination has already been performed, and a member of the birth mother's obstetrical care team reviews and signs a form confirming absence of any physical examination findings that would be a contraindication to donation.

Tissue banks shall develop SOPs related to attestation of a physical examination (J1.200) which address at a minimum:

- Information to be reviewed with or by the physician, or designee, as part of examination attestation. (See following form)
- Process of completing the attestation, which may also be obtained by the responsible tissue bank representative when interviewing the physician or designee, rather than signed by the physician or designee themselves.
- Whether the physician/medical provider performing the exam or the responsible tissue bank representative signs an attestation, the signature(s) attest that there are no physical examination findings that would be a contraindication to donation, as listed in the attestation form.
- Obtaining all available relevant records listed in section II, along with the birth mother's prenatal records, to support the attestation.

An example form of documented attestation with the physician or healthcare provider is below. (**Tissue banks may also develop their own form**):

PHYSICAL EXAMINATION ATTESTATION Hospital Physical Exam Performed? Date: Review the questions below with a qualified medical staff member associated with the delivery. Name of Medical Professional that provided answers: Title: □ MD/DO □ CNM □ RN/LPN □ Other __ 1. Is there physical evidence of any sexually transmitted diseases (including genital rash/outbreak, ulcers, vesicles, chancre, condyloma, condyloma lata, or rashes on palms ☐ Yes ☐ No or soles)? 2. Is there physical evidence/signs of a current infection, or an unexplained rash/ | | Yes | | No petechiae, fever, skin lesions, swollen lymph nodes, or other signs of a virus? 3. Is there physical evidence of non-medical percutaneous drug use such as needle tracks. Yes No 4. Has an examination evaluated for absence of signs of non-medical percutaneous drug ☐ Yes ☐ No use, including examination of tattoos that may cover needle tracks? 5. Are there any abnormal ocular findings consistent with vaccinal keratitis? Yes No 6. Are there any scabs consistent with recent smallpox vaccinations, Eczema vaccinatum, ☐ Yes ☐ No or necrotic lesions consistent with vaccinia necrosum? 7. Unexplained jaundice, enlarged liver (hepatomegaly) or icterus? Yes No 8. Is there any other physical evidence of any infectious diseases, or a current systemic infectious illness? (If yes, state information obtained) Yes No **COMMENTS/FINDINGS:** Interview for completion of attestation performed by (signature): Print name: Date:

C. Review of Relevant Medical Records Identifying Documented Physical Examinations by Medical Professionals Involved in the Birth Mother's Care

Review of relevant medical records identifying documented physical examinations by medical professionals involved in the birth mother's care.

This section discusses obtaining all relevant records generated from the beginning of a birth mother's prenatal care, through those records generated during admission to deliver:

- Within their SOPMs, tissue banks shall establish and define the records needed to enable a complete review (J1.200). See section II (Background) above for an overview of typically available documentation.
- The review of these records should contain all the information needed to meet the physical examination requirement as defined by the tissue bank's medical director.
- If the records do not contain the required information (for example, negative test of cure documentation post treatment of infection), then SOPMs should include this as an instance when a directed physical exam must be performed.
- In the event the birth mother has not had continuous care, or has established care later in pregnancy, the tissue bank should establish an acceptable length of time for prenatal care, to ensure robust documentation.

Provided below is an example list of information that should be reviewed to ensure a birth mother is free of infections, and infectious diseases. It is not an all-inclusive list, as this list should be developed and approved by the tissue banks medical director. Some information may vary by state depending on where finished allografts are distributed.

INFORMATION REVIEWED for PHYSICAL EXAMINATION			
Physical Exam Date:			
Prenatal and Perinatal Records Reviewed for:	Present	Notes	
Medical provider or hospital-generated records, including those containing review of systems			
Current Admission/Delivery H&P Examination			
3. Intraoperative records			
4. Confirmation of no current or active disease or systemic infection			
 Additional records obtained based on information provided by the birth mother (provide a list) 			
Comments / Findings:			
Based on this review, there is sufficient documented information to determine that the requirements for a physical exam are:			
☐ COMPLETED or ☐ NOT COMPLETED for further donor-eligibility determination review.			
☐ MORE INFORMATION REQUIRED (LIST DOCUMENTATION REQUESTED):			
Medical Director Date			

D. Directed Physical Examination: Follow up of Discordant Information

Occasionally, information is obtained or otherwise discovered that contains discordant information about a body part/system, found to be unavailable in existing records. Such circumstances may warrant a limited, directed physical examination to resolve any discrepancies or missing data.

SOPs should establish why, and under what circumstances directed physical exams are performed and documented. The additional information from a directed physical exam must be performed by a responsible and trained person and the information must be verifiable, either via a directed physical examination or obtaining records post infection, which confirms any treatment has been successful.

A directed physical examination should encompass a further examination of the body part or region in question. Instances where a directed physical exam should be performed may include:

- Any history or information about the birth mother, obtained from the completed donor risk assessment interview, is determined to be discordant with other relevant records.
- Any of the established requirements for information needed within the physical examination or medical record is lacking or inconclusive.
- If the birth mother's H&P examination is not performed or available at the time of delivery or is incomplete based on the pre-established requirements.

Following is an example of a form that may be used to document a directed physical examination. Another example of documenting a directed physical examination can be found in Appendix III Tissue Donor Physical Assessment Form Requirements.

Directed Physical Examination of Birth Mother (Mark only portions of the Physical Examination performed, otherwise select NP) WNL (yes or no) Please indicate the reason / issue being addressed by the directed physical examination: OR not performed (NP) **Vital Signs:** Body temperature ☐ Yes ☐ No Pulse rate \square NP Respiration rate Blood pressure Constitutional □ Yes □ No Healthy appearing Eyes – conjunctiva normal, sclera white ☐ Yes ☐ No Neck – no lymphadenopathy present ☐ Yes ☐ No Breasts – no skin changes, no discharge, no masses on palpation ☐ Yes ☐ No Gastrointestinal Abdominal Examination – non-tender to palpation, normal bowel sounds, no masses ☐ Yes ☐ No Liver and Spleen – no hepatomegaly present, non-tender to palpation Hernias – no hernias present Genitourinary External Genitalia – normal appearance, no unusual discharge Vagina – no unusual discharge or masses Bladder – non-tender to palpation ☐ Yes ☐ No Urethra – structural support normal Cervix – non-tender to palpation Uterus – non-tender to palpation, no masses present Perineum – no lesions present Anus – no lesions, no masses ☐ Yes ☐ No Lymphatic – No lymphadenopathy present Skin – No rashes, no lesions, no areas of discoloration \square Yes \square No 1. Is there physical evidence of any sexually transmitted diseases (Including genital rash/outbreak, ulcers, vesicles, chancre, condyloma, condyloma lata; or rashes on palms or ☐ Yes ☐ No soles)? 2. Is there physical evidence/signs of a current infection, or an unexplained rash/ petechiae, \square Yes \square No fever, skin lesions, swollen lymph nodes, or others signs of a virus? 3. Is there evidence of needle tracks or other non-medical injection site? ☐ Yes ☐ No **Findings or other comments:** Printed name: Signature/Date:

III. References

- 1. Current AATB Standards for Tissue Banking, McLean, VA
- 2. FDA Code of Federal Regulations Title 21, Part 1271
- 3. FDA: Eligibility Determination for Donors of HCT/Ps, Guidance for Industry, August 2007