

GAO Questions for American Society of Transplantation (AST)

The Government Accountability Office (GAO) is studying the Organ Procurement and Transplantation Network (OPTN) in response to a congressional mandate in the Securing the U.S. Organ Procurement and Transplantation Network Act, Public Law 118-14. We would like to gain the AST's perspective on the fees the OPTN contractor charges transplant hospitals, in particular the UNOS fee that is separate from the patient waitlist registration fee. We hope that you can provide your answers to the following questions over email.

General Questions

1. We understand that UNOS charges a monthly fee to transplant hospitals. This fee is “based on additional work to include analysis and data related services provided to all transplant community members that the Organization bills to those same member organizations that received an OPTN fee and is solely a UNOS based fee,” according to UNOS’s financial statement from FY2023.¹

To clarify, this is not a monthly fee, it is an additional fee per waitlist addition added to the monthly invoice for the OPTN registration fees. Currently, the OPTN fee is \$868 per waitlist addition and the UNOS fee is \$137.

- a. Do all transplant hospitals pay the UNOS fee? **Most programs, if not all, are currently paying the UNOS fee.**
- b. Is this fee voluntary? If yes, is the voluntary nature of the fee clearly communicated to transplant hospitals? **Yes, the fee is voluntary, but this is not well publicized. Transplant hospitals may not realize that this fee is voluntary in significant part because UNOS invoices them on the same invoice used for the OPTN fee, which is not optional (and nonpayment of which is a violation of OPTN bylaws). To our knowledge, programs were never asked to opt in or opt out of this fee. Until September of 2021, the UNOS fee was included on the same invoice as the OPTN fee under UNOS letterhead. Starting September of 2021, UNOS started sending two invoices every month – one for the OPTN fee with OPTN letterhead and one for the UNOS fee on UNOS letterhead. This fee does provide access to many reports that transplant programs use for performance monitoring, clinical review, etc. These reports are currently not available under the deliverables of the OPTN Final Rule. Many if not most programs are not aware of what this fee covers versus what is covered by the OPTN fee.**
- c. If you are aware of any transplant hospitals who do not pay the fee, could you explain why they do not pay it? **To our knowledge, all programs are currently paying the UNOS fee. If you access UNet Data Services, you will see that there are reports listed as either OPTN or UNOS. The OPTN reports and data are available under the OPTN and the UNOS reports would only be available to those who pay the UNOS fee.**

¹These services include: (1) data services that OPOs use to understand transplant center acceptance patterns of organs; (2) Global Positioning System (GPS) tracking systems; (3) image sharing systems, (4) special data reports (for research projects); and (5) consultation services (which is a new service UNOS provides to OPOs and transplant centers), according to a stakeholder association we interviewed.





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- d. Is the fee a financial burden for transplant hospitals? **Fees for OPTN and UNOS are both currently allowable on the Medicare Cost Report. While the fees are burdensome, they are recoverable to some extent through the Medicare Cost Report and Organ Acquisition. This means that Medicare is paying a significant portion of these fees through cost report recovery.**
2. What services does UNOS provide to transplant hospitals as part of the UNOS fee?
- a. Could transplant hospitals contract with another organization to obtain these services or is only UNOS able to provide these services due to the information it has access to as the OPTN contractor? **Most of the services currently provided by UNOS are for access to data reports. Reports such as the UNOS CARE (Center Acceptance and Refusal Evaluation) Tool are increasingly valuable to programs as they seek to increase offer acceptance and decrease non-use. Other contractors with access to real-time data could develop these reports. Because UNOS has knowledge of the underlying databases and direct access to them as the OPTN contractor, it would be expensive and difficult for another contractor to provide similar reports. Some of the services, such as the staffing survey and Insurance Payer Request for Information, could more easily be replicated without needing access to the OPTN databases.**
- b. Document request: Please provide examples of the products provided to transplant hospitals. **The following screen shots show the reports that are used by programs provided by UNOS – and not by the OPTN. Other key products that provide value to the transplant community are the UNOS Staffing Survey and the Insurance Payer Request for Information, which centralizes and standardizes transplant specific reporting to all payers for Transplant Centers of Excellence.**
- c.

OPTN Visual Analytics
UNOS Visual Analytics
OPTN Data Files
UNOS Data Files
Data Requests
Data Quality
Documentation
Custom Reports
Custom Report Builder

Have feedback or questions?
data@unofedback@unos.org

UNOS Visual Analytics
Spot data trends easily with UNOS visual analytics tools and dashboards. These products are a benefit of UNOS membership.

	Center Acceptance and Refusal Evaluation Tool (CARE) Kidney and Pancreas This interactive dashboard includes all kidney, pancreas, and pancreas islet organ offers to your transplant program during the past 2 years. Filter by donor and organ characteristics. Review post-transplant outcomes of accepted organs and compare to refused organs that were transplanted elsewhere. Gain insights into acceptance practices and identify acceptance opportunities of additional organs. Updated weekly.
	Key Insights Dashboard This newly improved dashboard contains 24 high-level indicators about your program relative to your DSA. Year-over-year trends include waitlist volume, transplant volume, and organ offer acceptance. Updated weekly.
	Predict Tool This dashboard is a quality improvement tool for member hospitals that uses the most recent SRTF models and current OPTN data to forecast a variety of different metrics for future program-specific report (PSR) cohorts. Transplant hospitals can monitor the current state of their risk-adjusted outcomes for future PSR cohorts, and use this information to develop and implement improvement plans in advance of the PSR. Updated monthly.
	Staffing Survey 2024: Data Collection Data collection is now open for the 2024 Staffing Survey. The UNOS Staffing Survey allows Transplant Administrators to view summary and comparison data from other programs to assist their planning and hiring strategies. As in prior years, only programs that complete surveys for their organ-specific programs will have access to the summary and comparison data.

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<p>Overview</p> <p>OPTN Visual Analytics</p> <p>UNOS Visual Analytics</p> <p>OPTN Data Files</p> <p>UNOS Data Files</p> <p>Data Requests</p> <p>Data Quality</p> <p>Documentation</p> <p>Custom Reports</p> <p>Custom Report Builder</p> <p>Have feedback or questions? dataportalfeedback@unos.org</p>	<p>2023 Staffing Survey Results Spreadsheet View 2023 Staffing Survey Results Spreadsheet View - Use this interactive report to view results of benchmark values obtained from the 2023 UNOS Staffing Survey in a spreadsheet format. Access those results in a single spreadsheet format for ease in using the data for other reports and spreadsheets. Data are only available for program types your hospital submitted during the 2023 survey. See the Staffing Survey User Guide for more information on using this report.</p> <p>RFI 2024 Submitted Attachments All of the attachments submitted by your transplant hospital for the 2024 RFI survey.</p> <p>Sample Custom Donor Acceptance Rates UNOS Benchmark Chapter This sample custom chapter of the UNOS Transplant Benchmark Report provides information on the data and general structure available to members. To request this customization, submit the UNOS Analytics Service Request form by using 'add a new request' on Secure Enterprise landing page. For organ specific samples of this supplemental chapter, please contact the data products team at dataportalfeedback@unos.org.</p> <p>Sample Custom Follow-up Form UNOS Benchmark Chapter This sample custom chapter of the UNOS Transplant Benchmark Report provides information on the data and general structure available to members. To request this customization, submit the UNOS Analytics Service Request form by using 'add a new request' on Secure Enterprise landing page. For organ specific samples of this supplemental chapter, please contact the data products team at dataportalfeedback@unos.org.</p> <p>Sample Custom Patient and Graft Survival UNOS Benchmark Chapter This sample custom chapter of the UNOS Transplant Benchmark Report provides information on the data and general structure available to members. To request this customization, submit the UNOS Analytics Service Request form by using 'add a new request' on Secure Enterprise landing page. For organ specific samples of this supplemental chapter, please contact the data products team at dataportalfeedback@unos.org.</p> <p>Sample Custom Waiting List Volume Trends UNOS Benchmark Chapter This sample custom chapter of the UNOS Transplant Benchmark Report provides information on the data and general structure available to members. To request this customization, submit the UNOS Analytics Service Request form by using 'add a new request' on Secure Enterprise landing page. For organ specific samples of this supplemental chapter, please contact the data products team at dataportalfeedback@unos.org.</p> <p>Transplant Center Kidney Benchmark Report Transplant Program Kidney Benchmark Report</p> <p>Transplant Center Pancreas Benchmark Report Transplant Program Pancreas Benchmark Report</p> <p>UNOS RFI: Activate Payor Data (2024) This PDF report includes the Activate Payor data provided for the 2024 RFI. While not all of this information is required in 2025, this report is available to assist you with entering 2025 data related to surgeons, physicians, and transplant administrators at your program.</p> <p>UNOS RFI: Activate Payor Data (2025 - Current) This PDF report includes the Activate Payor data provided for the current (2025) RFI. This report is available for you to 1) review your submission for accuracy before submitting, and 2) to maintain as documentation of your submission. This is the one piece of the RFI that can be modified after submission if you need to add additional payors/networks.</p>
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3. The OPTN Final Rule, 63 Fed. Reg. 16,296, 16,300 (Apr. 2, 1998), specifies that UNOS bylaws, operating procedures, and membership requirements apply only to UNOS members and not to OPTN members. Are all or some transplant hospitals UNOS members? **To our knowledge, currently every OPTN transplant hospital is also a UNOS member.**
 - a. If so, how does that membership, and any member fees charged, differ from OPTN membership and fees? Both fees are assessed on a per patient basis (fee per patient added to the waitlist). **The OPTN fee supports OPTN tasks per the OPTN Final Rule; the UNOS fee supports additional data, operational and reporting services, outside of the OPTN approved tasks.**
 - b. Is membership voluntary? If yes, is the voluntary nature of UNOS membership clearly communicated to transplant hospitals? **UNOS membership is voluntary; however, it is not clearly communicated to members that this membership and the registration fees are voluntary. Transplant hospitals do not have to be UNOS members, but if they were not, they would lose access to key services that facilitate common transplant tasks – such as performance review and commercial insurance data requests.**