



September 25, 2020

The Honorable Alex Azar II
Secretary
U.S. Department of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20201

RE: Organ Procurement Organization Accountability and Performance

Dear Secretary Azar:

The American Society of Transplantation is a patient-focused professional society comprised of more than 4,000 health care and research professionals across the organ transplant team. We are supportive of Organ Procurement Organization (OPO) accountability for performance and thoughtfully developed metrics that can be used for process improvement. We also support a system that is transparent to the public. While we recognize that the deceased donor organ recovery system in the United States is one of the best in the world, we believe there are always opportunities for improvement. Continued dedication to improving the system is essential so that more patient lives will be saved through increased access to deceased donor organ transplantation.

Deceased organ donation requires complex and sensitive human interactions. Organ Procurement Organization staff must have difficult conversations with families of potential deceased donors at a time of intense emotional anguish. We recognize the challenges in both identifying potential deceased donors who have not pre-stated their intention to donate and ultimately receiving authorization for organ and tissue donation. We believe that this process only works when OPOs, donor hospital administration, and hospital staff are dedicated to the mission of deceased organ donation. This process requires a sensitive, culturally focused discussion with donor family members. Because this process is highly complex and requires the participation of all stake holders, we believe that merely developing a new set of metrics for OPOs is inadequate. Therefore, we urge a holistic approach that relies on improvement in both OPO and donor hospital performance as well as thoughtful and culturally competent messaging to the public at large.

NATIONAL OFFICE

American Society of Transplantation
1120 Route 73, Suite 200 • Mt. Laurel, NJ 08054
856.439.9986 • Fax: 856.581.9604
info@myAST.org • myAST.org

GOVERNMENT RELATIONS

William Applegate, Director of Government Relations
Bryan Cave Leighton Paisner LLP
1155 F Street, NW • Washington, DC 20004
202.258.4989 • bill.applegate@bcplaw.com

While we understand the need to modify and enhance metrics in the area of OPO performance, we do not endorse a disruptive approach that has the potential to destabilize the system at large and that does not completely address the factors that limit donation. Increasing organ donation requires a comprehensive strategy. Changes to the current system are necessary but should be undertaken systematically to avoid disruptions that may limit access to deceased donor organs and disadvantage patients in critical need of organ transplantation. Finally, we urge for a commitment from OPOs and regulatory agencies to work with donor hospitals to ensure optimal end of life care for all potential donors and their families while also providing culturally appropriate information regarding organ donation. It is our considered opinion that anything short of a comprehensive approach will be ineffective and is susceptible to unintended negative consequences. Therefore, we call for a pause in the current process and for convening a working group of stakeholders to chart a comprehensive path forward.

Please let us know how we might be of assistance in resolving this issue. We are eager to find a solution so that more patient lives will be saved through increased access to deceased donor organ transplantation.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Formica, Jr.', with a stylized flourish at the end.

Richard N. Formica, Jr., MD
President