

### **Association of Organ Procurement Organizations Comments on Executive Order on Kidney Care**

July 10 – The Association for Organ Procurement Organizations (AOPO), representing the 58 federally-designated OPOs across the United States, strongly supports the intent of the Advancing American Kidney Health Executive Order signed today by President Trump, which is to reduce the toll of kidney disease on individuals, families and our nation. Organ procurement organizations (OPOs) are working every day to save more lives through organ donation and transplantation. We appreciate the Administration’s pledge to update regulations that stand in the way of this goal, as well as increase kidney transplants by reducing the discard of potentially usable organs.

OPOs support the goal of enhanced performance metrics that improve the ability to recover and deliver organs to those who need them.

OPOs also embrace the goal of ensuring that every generously donated organ finds a suitable transplant recipient. Removing regulatory and financial disincentives to transplant centers using organs from medically complex donors and donors after circulatory death would accelerate the increase of transplantation over time. This is a significant issue. **In 2018 roughly 20% of available donor kidneys were discarded rather than being transplanted.**

There are many variables that determine the medical suitability of kidneys from deceased donors. Any metric must provide for an accurate estimate of true organ donation potential through the collection of timely, consistent and relevant data across all hospitals. Unless a potential donor is in the hospital and on a ventilator at the time of death, the organs cannot be donated and transplanted. Additionally, a metric should be flexible to adjust for advances in medical science and transplant program acceptance practices.

We look forward to working with CMS during the rulemaking process to ensure that final rules carry out the mission of President Trump’s executive order, to improve quality of life for those with kidney disease and enhance our ability to provide organs to those in need of transplants.

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## **Additional Facts About Organ Donation in the United States**

- As a community, OPOs are working toward the day that no one dies waiting for a lifesaving organ. All OPOs fully embrace constructive changes to the organ donation and transplantation system. Working in collaboration with partner hospitals and transplant centers will result in more lives saved.
- The U.S. organ donation system is a global leader in saving lives and we continue to strive for improvement.
  - The last eight years have seen successive records for organ donation.
  - Patient deaths on the waitlist are at an 18-year low according to the OPTN data.
- OPO data reporting requirements are dictated by regulatory bodies and validated during regular audits. Oversight and accountability are provided through Centers for Medicare & Medicaid Services (CMS), the Health Resources and Services Administration (HRSA) of the U.S. Department of Health & Human Services, and the Organ Procurement and Transplantation Network (OPTN).
- There is a complex and highly regulated system for organ donations in the U.S. that ensures the integrity, safety and transparency of the donation and the procurement process, as well as accountability for OPOs.
- Ongoing performance monitoring by the OPTN is reinforced by on site surveys every three years. CMS makes similar on-site audits, monitoring their own separate regulatory requirements which includes data validation and review of donor records.

If you have additional questions or would like to speak to an OPO expert, please contact: [media@aopo.org](mailto:media@aopo.org).