Here are some of the concerns raised about the OPO rule as proposed by the Center for Medicare and Medicaid Services (CMS) from medical and surgical transplant societies, hospitals, transplant programs, and state public health officials:

**American Society of Transplantation (AST)**

“There seems to be a complete absence of assessment of the methodological quality of the studies referenced; rather, studies appear to be used to support positions already assumed...[T]he proposal loses sight of the fact that the U.S. has one of the highest rates of organ donation in the world.”

**American Society of Transplant Surgeons (ASTS)**

“...we are concerned that unintended system consequences may follow from well-intended changes that address only one component of the complex transplant ecosystem.”

**Society of Thoracic Surgeons (STS)**

“The specter of decertification will create substantial pressure on OPOs to maximize donation rates. There is the potential that this perverse incentive may bias the evaluation, testing, and reporting processes of donor characteristics in a way that could influence transplant centers to alter decision making about donor suitability.”

**Greater New York Hospital Association (GNYHA)**

“GNYHA recommends that CMS not adopt the proposed organ transplantation rate outcome measure because it will not lead to increased organ donation and transplantation...CMS should instead retain the current observed-to-expected outcome measure.”

**Sanford Medical Center, Sanford Health**

“The proposed rule directs OPOs to increase the number of organs transplanted. We want that outcome as well, but we want to be clear that the decision to accept an organ rests with us, the transplant center, and not with the OPO.”

**Baylor Scott and White Health**

“Without addressing risk aversion, which OPOs have little control over, or other factors like a new allocation system, the Proposed Rule may not accurately measure OPO performance.”

**Northwestern Memorial Hospital**

“I am concerned that CMS is basing the need for drastic change in the structure of the organ donation system based on incomplete and unverified information.”

“I fear that the Department may decrease the availability of transplantable organs and undermine public trust in the national transplant program, by repeatedly citing these publications that lack scientific rigor and rely heavily on anecdotal information.”

**University of Minnesota Medical School**

“The results of such a massive decertification, or anything even remotely resembling it, would significantly disrupt the system likely leading to a substantial decrease in donation...we suggest there be a cut-off that is based on statistically validated methods, such as a standard deviation variation from the mean.”

**Emory Transplant Center**

“We are concerned that the metrics as proposed would result in decertification of over half the OPO’s which could cause a major disruption to the ability to deliver organs for transplant that would have a negative impact on our ability to care for our patients.”

AOPO and the Organ Procurement Organization (OPO) community support valid and continually improving performance metrics, that are based on sound data. Unfortunately, the proposed metrics fail to meet these standards. For how the proposal can be improved click here.