

## Response to Advisory Group Comment

Exhibit for the Authorization Rate for Organ Donation Among Approached, Referred Potential Organ Donors in the Organ Procurement Organization's (OPO) Donation Service Area (DSA) in a Calendar Year

CBE ID #5603, Spring 2026

### 5.3.3 Method(s) of Validity Testing

As noted in Section 5.3.3 under criterion validity, we used the Multiple Cause of Death (MCOD) data as an external data source to estimate a value of ventilated referrals as a proportion of deaths within the OPO's donation service area (DSA). For example, in Table 1, OPO 1's DSA experienced a potential donor population (deaths potentially suitable for donation) of 11,604 in the reporting period. OPO 1 recorded referrals of 18,734. By multiplying the number of deaths in the potential donor population (MCOD) by 26 percent (an estimate of the number of hospital deaths of patients who were using a ventilator), there is an estimated maximum number of ventilated referrals of 3,017 patients. By subtracting the number of authorizations reported by OPO 1 (1,869) from the number of approaches reported by OPO 1 (2,909), there is a difference of 1,040. This represents a percent difference of 44 percent ( $\text{Percent Difference} = (|a - b| / ((a + b) / 2)) \times 100$ ). This added confidence that OPO 1 is capturing the expected authorization data in its DSA in its referrals.

**Table 1. Criterion Validity - Authorization Rate (5603)**

|                                                                                 | OPO 1  | OPO 2  | OPO 3 | OPO 4  | OPO 5  | OPO 6 |
|---------------------------------------------------------------------------------|--------|--------|-------|--------|--------|-------|
| <b>MCOD Deaths (Potential Donor Population)</b>                                 | 11,604 | 15,800 | 3,314 | 9,329  | 6,341  | 4,794 |
| Estimated Maximum Ventilated Referrals (26% of MCOD Deaths)*                    | 3,017  | 4,108  | 862   | 2,426  | 1,649  | 1,246 |
| <b>OPO-Reported Referrals</b>                                                   | 18,734 | 19,199 | 7,131 | 12,887 | 13,511 | 8,634 |
| <b>OPO-Reported Approaches</b>                                                  | 2,909  | 6,890  | 953   | 2,407  | 2,395  | 1,560 |
| <b>OPO-Reported Authorizations</b>                                              | 1,869  | 3,204  | 558   | 1,244  | 1,739  | 976   |
| <b>Difference (OPO-Reported Approaches minus OPO-Reported Authorizations)</b>   | 1,040  | 3,686  | 395   | 1,163  | 656    | 584   |
| <b>Percent Difference of Reported Authorizations versus Reported Approaches</b> | 44%    | 73%    | 52%   | 64%    | 32%    | 46%   |

\* Estimated Maximum Ventilated Referrals are calculated as 26% of MCOD deaths.