

The Partnership for Quality Measurement
P.O. Box 1532
Brunswick, GA 31521

RE: CBE IDs: 5601, 5602, 5603, 5604

Dear Partnership for Quality Measurement (PQM) Team:

The Association of Organ Procurement Organizations (AOPO) appreciates the opportunity to provide comments on the following measures:

- CBE ID: 5601 Rate of Hospital Referrals of Potential Organ Donors Made to the Organ Procurement Organization (OPO) from within the OPO's Donation Service Area in a Calendar Year.
- CBE ID: 5602 Rate of Referred Patients that are Approached for an Organ Donation in the Organ Procurement Organization's Donation Service Area in a Calendar Year.
- CBE ID: 5603 Authorization Rate for Organ Donation Among Approached, Referred Potential Organ Donors in the Organ Procurement Organization's Donation Service Area in a Calendar Year.
- CBE ID: 5604 Rate of the Number of Organ Donors to the Potential Donors in an Organ Procurement Organization's Donation Service Area in a Calendar Year.

BACKGROUND

AOPO is the national trade association representing 47 of the nation's organ procurement organizations (OPOs). OPOs are federally designated, non-profit organizations responsible for facilitating deceased organ donation in partnership with donor hospitals, donor families, transplant centers, and other stakeholders across the donation and transplantation system. OPOs serve every community in the United States and play a critical role in helping save and improve lives through organ donation and transplantation.

DISCUSSION

AOPO strongly supports endorsement of CBE IDs 5601, 5602, 5603, and 5604 because they provide a more accurate, actionable, and accountable framework for evaluating organ donation performance than the measures currently used by CMS. These measures are critical to strengthening the nation's organ donation system and ensuring that every donation opportunity is maximized.

Meaningful improvement in the organ donation system depends on performance measures that accurately assess the responsibilities of each stakeholder. Effective measurement should evaluate the activities organ procurement organizations directly control, rather than relying solely on end-stage outcomes influenced by multiple stakeholders. When metrics fail to reflect actual performance, they can obscure opportunities for improvement, misdirect accountability, and ultimately affect patients awaiting lifesaving transplants.

Current Performance Measures Do Not Fully Measure OPO Performance

The two current CMS metrics—donation and transplant rate—do not fully reflect the work performed by OPOs. In particular, the current transplant rate reflects the performance of the broader system, including transplant centers, acceptance practices, transportation and other factors beyond an OPO's control. This makes it difficult to fairly evaluate performance or identify where improvements are truly needed. As a result, the current framework risks unintended consequences for patients and system stability.

Endorsement Is Critical to Protecting System Stability and Patient Access

Under existing CMS regulations, nearly two thirds of OPOs could face decertification or competition this year. Based on current data, OPOs serving up to 72 percent of the U.S. population will be impacted by the end of 2026. Such widespread disruption across the donation system poses significant risks to a highly coordinated and time-sensitive donation system. The focus should be on improving performance while maintaining continuity of care for patients and donor families.

Organ donation relies on seamless collaboration among hospitals, donor families, OPOs, transplant centers, and transportation partners. Instability in any part of this process can jeopardize donation opportunities and delay transplantation for patients in need. Endorsing measures that more accurately assess OPO performance is essential to ensuring accountability while preserving continuity of care and maintaining public confidence in the system.

The Proposed Measures Are Scientifically Rigorous and Broadly Supported

AOPO, in partnership with 53 OPOs and Econometrica, Inc., launched a national effort to develop better performance metrics identified as the four measures mentioned above. These measures are the result of a rigorous, multi-stakeholder development process that included independent measure development experts, technical expert panel input, stakeholder interviews, site visits, literature review, and testing aligned with CMS measure development standards. As a result, these measures are scientifically sound, objective, and well-positioned to support national quality improvement efforts.

The development process also generated extraordinary collaboration across the OPO community. Ninety eight percent of OPOs participated in the measure development process and committed to advancing a common framework for quality improvement and accountability. This level of engagement demonstrates broad stakeholder confidence in the measures and a collective commitment to improving outcomes for donor families, transplant candidates, and recipients.

The Measures Provide Actionable Insights Throughout the Donation Process

A key strength of these measures is that they evaluate the full donation pathway, including referral, family approach, authorization, and donation. Together, they provide a comprehensive picture of the activities OPOs perform every day to facilitate organ donation.

Unlike outcome measures alone, these metrics identify where barriers exist within the donation process, enabling targeted quality improvement efforts. They support stronger hospital partnerships, improved family authorization practices, and more effective identification of donation opportunities. Most importantly, they provide actionable information that can be used to improve performance at each step of the donation process.

Endorsement Will Advance Accountability, Transparency, and More Lives Saved

Endorsing these four measures would establish a performance framework that is fairer, more transparent, and more useful for driving improvement. Accurate measurement strengthens accountability by evaluating what OPOs actually do, while also creating opportunities for collaboration and continuous quality improvement across the donation system.

Ultimately, endorsement is about more than measurement. These metrics will help maximize donation opportunities, improve coordination among stakeholders, strengthen public trust, and increase the number of organs available for transplantation. Better measurement leads to better performance, and better performance means more lives saved.

CONCLUSION

AOPO appreciates the opportunity to provide comments on the proposed measures—**CBE IDs 5601, 5602, 5603, and 5604**—for endorsement. We strongly support their endorsement and believe they represent a significant advancement in the measurement of OPO performance.

These measures provide a scientifically rigorous, transparent, and actionable framework that better reflects the work performed by OPOs and supports continuous quality improvement across the donation system. Endorsement by PQM would help advance a more meaningful approach to performance measurement – one that strengthens accountability, promotes collaboration, supports system stability, and ultimately helps save more lives through organ donation and transplantation.

As an organization committed to advancing strategies that increase the number of lives saved through organ donation and transplantation, AOPO offers these comments in support of that mission.

Sincerely,



Allison J. Erickson
AOPO President
Chief Administrative Officer, New England Donor Services (NEDS)

On behalf of:

The Association of Organ Procurement Organizations (AOPO)
McLean, Virginia