



A Donate Life Organization

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:

Donor Network of Arizona 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.

As a member of the Organ Procurement Organizations (OPO) community, we firmly support the proposed measures for endorsement.

BACKGROUND

Donor Network of Arizona is a federally designated nonprofit OPO that serves all 7.6 million residents in the state of Arizona. Our mission is to make the most of life through the gift of organ and tissue donation.

DISCUSSION

The two current CMS metrics—donation and transplant rate—do not fully reflect the role of OPOs in the system. Additionally, the current transplant rate reflects the performance of the entire system, including transplant centers, recovery hospitals and logistics, not just OPOs. This makes it difficult to hold OPOs accountable for system performance when some of the performance elements and improvements that need to be made lie outside of OPO control.



A Donate Life Organization

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 consistent with CMS measure development standards. This coordinated effort has ensured the metrics are objective, scientifically sound, and trusted by policymakers.

Additionally, these proposed measures focus on the work that OPOs actually do. These four measures provide a systematic assessment of the organ donation process—from the referral through the recovery of organ donors. This allows Donor Network of Arizona, like other OPOs, to identify opportunities for improvement at specific stages of the donation process and implement targeted quality improvement efforts that strengthen hospital partnerships, improve family authorization processes, and maximize donation opportunities. The proposed measures provide actionable information that supports these efforts and helps ensure continuous improvement across the donation process.

CONCLUSION

Donor Network of Arizona appreciates the opportunity to provide comments on the proposed measures—**CBE IDs 5601, 5602, 5603, and 5604**—for endorsement. As an organization committed to advancing strategies that increase the number of lives saved through organ donation and transplantation, Donor Network of Arizona offers these comments in support of that mission.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kathy Mills".

Kathy Mills
President and CEO

On behalf of:

Donor Network of Arizona
2010 W Rio Salado Pkwy
Tempe, AZ 85281