



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:

Mid-South Transplant Foundation 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

Mid-South Transplant Foundation is a federally designated not-for-profit organ procurement organization (OPO) for counties in western Tennessee, northern Mississippi and eastern Arkansas. Since 1976, MSTF has worked to improve lives through organ and tissue donation and remains committed to its vision of ending the wait for those in need of an organ or tissue transplant. As the designated OPO for a service area of approximately 2.1 million people across 36 counties, MSTF provides a comprehensive range of services, including organ procurement, tissue recovery, laboratory testing, 24-hour response to hospital referrals, professional education, family support, and community outreach programs that promote donation awareness and donor registration. Through close collaboration with hospitals, healthcare professionals, donor families, and community partners, MSTF strives to maximize donation opportunities and increase access to life-saving transplantation.

DISCUSSION

Improvements in the organ donation system cannot happen unless there are strong metrics that accurately measure the performance of the different stakeholders in the system. The metrics, and



oversight within the system, should reflect what each part of the system actually does and not just the final outcome. When metrics are inaccurate, they not only affect organizations; they can also affect patients waiting for lifesaving transplants. Good measurement leads to better decisions, stronger accountability, and more lives saved.

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 and logistics, not just OPOs. 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. Under the current framework, nearly half 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. This creates the potential for widespread disruption across the donation system. Organ donation is a highly coordinated, time-sensitive process, and instability anywhere can impact patients everywhere. The focus should be on improving performance while maintaining continuity of care for patients and donor families.

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, they focus on the work OPOs actually do. These four measures provide a comprehensive assessment of the organ donation process—from referral and approach through authorization and donation. This allows OPOs and stakeholders to identify opportunities for improvement at specific stages of the donation process and implement targeted quality improvement efforts. This level of transparency and actionable insight is not possible when performance is evaluated solely through end-stage outcome measures.

At Mid-South Transplant Foundation, we use data-driven quality improvement efforts to 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.

At Mid-South Transplant Foundation, data plays a critical role in quality improvement, performance monitoring, and operational decision-making. The examples below demonstrate how referral, approach, authorization, and donation data are used to assess performance and support continuous improvement initiatives. They also illustrate how the proposed measures align with our current key performance indicators.

Data-Driven Quality Improvement



- MSTF uses referral, approach, authorization, and donation data to identify performance trends, evaluate outcomes, and prioritize quality improvement initiatives.
- The proposed measures align with how OPOs already manage performance and support targeted interventions throughout the donation process.

Stage-Specific Performance Metrics

- The proposed measures provide visibility into distinct phases of the donation pathway rather than relying solely on final donation outcomes.
- Referral, approach, authorization, and donation measures help identify specific operational strengths; review workflow processes that impact each measure and opportunities for improvement.
- This level of transparency supports more effective quality improvement efforts and accountability.

Strengthening Hospital Partnerships

- Successful organ donation requires shared accountability between hospitals and OPOs.
- Referral and approach measures recognize the critical role hospitals play in identifying potential donors, making timely referrals, and supporting donation conversations with families.
- Sharing measure results with hospital partners supports collaborative improvement efforts, education, and performance monitoring.

Supporting Continuous Process Improvement

- MSTF routinely uses performance data to:
 - Drive decision making.
 - Evaluate process changes.
 - Identify variation in practice across hospitals and service areas.
 - Measure the effectiveness of interventions over time.
 - Identify specific training needs for individual staff.
 - Drive education and outreach efforts in our hospitals and community.

Enhanced Benchmarking Across OPOs



- Standardized definitions for the measures allow for more equitable comparisons across OPOs by evaluating common processes that influence donation outcomes.
- More equitable benchmarking can identify best practices, encourage knowledge sharing, and promote industry-wide improvement.

Improved Denominator Methodology

- The proposed denominator builds upon existing methodologies by excluding patients with documented medical contraindications, resulting in a measure that more accurately reflects clinically relevant donation potential.
- MSTF supports the inclusion of ventilated patients in the denominator, as it better represents the population with donation potential and supports a more meaningful and actionable evaluation of OPO performance.

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

MSTF currently uses Referrals Rates as a KPI to evaluate and improve hospital performance. By analyzing referral timeliness, missed referrals, and referral patterns, and sharing these findings with hospital partners, MSTF can identify units and facilities with opportunities for improvement. These insights support targeted education, process enhancements, and workflow redesign initiatives, including innovative solutions such as automated referral triggers. Regular review of referral data allows MSTF to drive improvement, strengthen hospital partnerships, and recognize and celebrate areas of success.

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.

Approach Rate is not currently a formal KPI at MSTF; however, it has been reviewed and is planned for future incorporation into our performance metrics. While the Approach Rate is not presently tracked as a KPI, MSTF regularly analyzes approach data to identify gaps and opportunities for improvement throughout the authorization process.

This analysis helps identify barriers to timely family conversations, including delays related to the hospital partners' involvement, and supports efforts to optimize the timing and effectiveness of donation discussions. The approach data helps identify opportunities for individual and team development, supporting focused coaching, scenario-based training, and skill-building initiatives that enhance communication effectiveness.



In addition, MSTF uses approach data to evaluate trends across donor pathways, including brain death (BD) and donation after circulatory death (DCD), as well as first-person authorization (FPA) and non-FPA cases. These analyses allow for a deeper understanding of demographic and operational factors that may influence approach outcomes. For example, identifying differences in approach patterns between BD and DCD cases led MSTF to re-evaluate its practice and ultimately discontinue the use of the DCD Evaluation and Predictor Tool, resulting in a significant increase in approaches.

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.

Authorization Rate is a key performance indicator currently used by MSTF to evaluate and improve donation authorization outcomes. MSTF analyzes authorization data across multiple dimensions, including registered versus non-registered donors, DCD versus brain BD cases, and demographic trends within our donation service area (DSA).

This analysis supports the evaluation of authorization performance at both the individual staff and hospital levels, helping to identify training needs, best practices, and opportunities for improvement. Authorization data also helps drive MSTF's outreach and community education strategies by highlighting populations and areas where increased awareness and engagement may help improve donor registration and authorization outcomes.

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.

Donation Rate is a key performance indicator used by MSTF to evaluate how effectively potential donation opportunities are converted into actual organ donors. MSTF continuously monitors donation rates and assesses the effectiveness of the entire donation process, including referral, approach, and authorization rates, as well as workflow efficiency and donor management practices. These ongoing evaluations help ensure the organization maintains the highest standards in donor conversion and donation outcomes. Donation Rate is a critical driver of our mission, and we support and appreciate the implementation of new methodologies that strengthen donation performance.

These accurate metrics will help ensure that every donation opportunity is maximized. They support better coordination across the system, so organs reach patients faster, and they strengthen transparency and public trust, which is essential for donation. Ultimately, better measurement means more transplants and more lives saved.

CONCLUSION

Mid-South Transplant Foundation 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, Mid-South Transplant Foundation offers these comments in support of that mission.

Sincerely,

A handwritten signature in black ink that reads "Kim Van Frank". The signature is written in a cursive, flowing style.

Kim Van Frank
Executive Director

On behalf of:

Mid-South Transplant Foundation
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