



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:

ConnectLife 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 OPO community, we firmly support the proposed measures for endorsement.

BACKGROUND

ConnectLife is a federally designated nonprofit OPO with a Donation Service Area covering the eight counties of Western New York.

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 two current CMS metrics – donation and transplant rate – do not fully reflect the role of OPOs. The transplant rate reflects the performance of the entire system, including transplant centers and logistics, not just OPOs. This makes it difficult to evaluate performance or target improvements. The current framework risks unintended consequences for patients and system stability: Nearly half of OPOs could face decertification or competition this year. This creates the potential for widespread disruption across the donation system. Organ donation is a highly coordinated, time-sensitive process. Instability anywhere can impact patients everywhere.



AOPO, in partnership with 53 OPOs and Econometrica, Inc., launched a national effort to develop better performance metrics and identified the four measures 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.

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

At ConnectLife, 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.

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 will provide a standardized manner of measuring referral rates, which is important for accurately assessing OPO performance. Cooperation from donor hospitals is a critical factor in recovering transplantable organs. The data will inform our quality improvement efforts, allowing us to more precisely target education programs for hospital staff.

ConnectLife's hospital development team already tracks referral statistics, proactively works on outreach and education with all hospitals in our donor service area, and thoroughly follows up with hospital leadership and staff any time there is a missed referral. Standardizing this measure across the donation system will enable more accurate comparisons between OPOs and allow us to better learn from the experiences of our colleagues in other service areas. Stratification by race, gender and age will also help us to discern whether certain demographic groups are served disproportionately and address such issues with our partner hospitals.

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 will quantify the extent to which our staff are having meaningful approach conversations with donors or the next-of-kin of potential donors. As this metric identifies when referrals are made but an approach conversation does not take place, ConnectLife can use the measure to explore the potential causes of any discrepancies. This measure will promote collaborative problem-solving with partner hospitals as we evaluate missed opportunities and seek solutions. A uniform approach rate will allow accurate performance evaluation across OPOs and the sharing of best practices.



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 will assist in identifying gaps and areas for improvement in the authorization process, facilitating our development of targeted interventions. ConnectLife already monitors authorization data, but the proposed measure will standardize tracking across OPO service areas and provide a meaningful framework for comparison. Authorization involves multiple factors, from timely referrals by hospitals to the sensitivity and skill of requestors and the registration status and personal characteristics of the potential donor and their next-of-kin.

This measure will allow ConnectLife to further evaluate our authorization outcomes by examining donor registration status, type of donation (Donation after Brain Death or Donation after Circulatory Death), the training of donation professionals and more.

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 will measure how often people who could be donors actually do become donors. The proposed measure is an adaptation of CMS, OPTN, and SRTR donation measures, using a more narrowly defined denominator. This metric will support ConnectLife as we continue to adopt and improve effective donor management, staff training, and communication with families. We can further explore the relationship between the donation rate and donor registration rate by service area.

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

ConnectLife 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, ConnectLife offers these comments in support of that mission.

Sincerely,



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