



July 6, 2026

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:

Legacy of Hope 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

Legacy of Hope (LoH) is a federally designated nonprofit OPO, and our mission is to “end the wait and suffering by shepherding the gift of life to those in need of organ and tissue transplants”. LoH serves 5.1 million Alabamans and more than 120 partner hospitals throughout the State.

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 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 do. These four measures provide a comprehensive assessment of the organ donation process. 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 Legacy of Hope, 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.

Legacy of Hope monitors key performance indicators, including referral rates, authorization rates, and the conversion rate of actual donors to potential donors, to evaluate organizational performance and identify opportunities for continuous improvement. These metrics provide valuable insight into the effectiveness of the donation process and help assess the organization's ability to serve donor families, transplant programs, hospital partners, and transplant recipients.

By routinely analyzing this data, LoH can identify trends, measure progress toward established goals, and implement targeted quality improvement initiatives. This data-driven approach supports informed decision-making, promotes accountability, and helps ensure compliance with industry standards and best practices. Ultimately, the ongoing evaluation of these performance

measures enables Legacy of Hope to provide a consistently high level of service throughout its designated service area while maximizing opportunities to save lives through organ donation.

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

Legacy of Hope 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, Legacy of Hope offers these comments in support of that mission.

Sincerely,

Christy Keahey
Executive Director

A handwritten signature in cursive script, reading "Christy Keahey". The signature is written in dark ink on a light background.

On behalf of:

Legacy of Hope
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