

To the Partnership for Quality Management -

I am writing to provide my support and feedback regarding **CBE ID [5601](#), [5602](#), [5603](#) and [5604](#)**:

- 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 **psychologist, cancer survivor, heart transplant recipient** and the **mother of a child who will likely need another transplant**, I possess a rare combination of lived experience and clinical expertise that uniquely positions me to understand the profound human impact of the organ donation system. I know firsthand what it means to face the terrifying uncertainty of organ failure, to wait for a lifesaving call, and to have my life fully restored because of the selfless gift of a donor and the complex system that facilitated it. My resilience, my purpose, and my very ability to navigate adversity and be here for my family are entirely owed to the miracle of transplantation.

I have deep appreciation for the vital role that organ procurement organizations (OPOs) play in this lifesaving ecosystem, acting as the **essential and compassionate link between selfless donors and patients like me who are desperately awaiting a second chance**. I understand that behind every successful transplant is a highly skilled OPO professional who had to navigate a delicate, nuanced conversation with a grieving family during a moment of profound loss. These professionals are entrusted to guide families through complex decisions with respect, sensitivity, and strong relational communication skills. The dedication and compassion OPOs show to donor families in their darkest hours is the foundation upon which all of our transplant stories are built.

These proposed measures are a critical step forward for the transplant system. Because the stakes are literally life and death for the more than 100,000 patients currently awaiting transplants, **it is absolutely critical that we accurately measure OPO performance so that the system can continuously improve**. The current CMS metrics rely on flawed outcome measures and a relative ranking system that places OPOs at risk of forced competition or decertification based on factors outside of their direct control, such as transplant center organ acceptance practices. **True accountability requires precise, standardized measurement of the foundational stages of the donation process that OPOs actually control.**

By adopting independently validated performance measures that accurately quantify an OPO's true effectiveness, we can identify process gaps, share best practices, improve system coordination, and ensure every donation opportunity is maximized to save more lives.

Thank you for the opportunity to share my perspective.

Sincerely,

Brittany Clayborne, PsyD

CEO - [Brittany Speaks, Inc.](#)

Author. TEDx Speaker. Heart Transplant Recipient. Cancer Survivor. Advocate. Psychologist.