



November 23, 2022

HRSA Information Collection Clearance Officer
Room 14N136B
5600 Fishers Lane
Rockville, MD 20857

RE: Information Collection Request; Data System for Organ Procurement and Transplantation Network, OMB No. 0915-0157-Revision

Dear Officer Miller:

Mid-America Transplant appreciates the opportunity to comment and provide additional information on the above-captioned Information Collection Request (ICR) related to the data system for the Organ Procurement and Transplantation Network (OPTN).

Having been in operation for over forty-six years, Mid-America Transplant (MT) recognizes and supports the need to improve the organ donation and transplantation system in the United States. Mid-America Transplant fully supports HRSA in its efforts to improve the organ and tissue transplant process in a way that will maximize donation opportunities and lead to more lives saved.

Mid-America Transplant further understands the complexity of this system, and the collaboration involved among OPOs, transplant centers, donor hospitals, families, and the general public to ensure as many lives are saved each day as is possible.

Mid-America Transplant offers the following information to assist HRSA in its efforts to improve the data system supporting organ donation and transplantation.

1. Necessity and Utility of the Proposed Information Collection for the Proper Performance of the Agency's and the OPTN's Functions
 - a. MT works diligently to carry out its mission of saving lives through excellence in organ and tissue donation. As part of this work, MT emphasizes the critical importance of having open and transparent access to data; such information directly impacts the ability of all those involved in the donation and transplantation process, informing decisions made that affect those waiting for a lifesaving transplant.
2. The Accuracy of the Estimated Burden
 - a. Based on its experience with the forms identified in the ICR, MT believes that the estimated burden is accurate.
3. Ways to Enhance the Quality, Utility, and Clarity of the Information to be Collected and the Use of Automated Collection Techniques or Other Forms of Information Technology to Minimize the Information Collection Burden
 - a. In the world of donation and transplantation, time is of the essence, and accuracy of information is critical to saving lives. Currently, the UNOS data system does not produce data in real time; OPOs receive reports with significant lag time ranging from 14 to 45 days in arrears. This impedes the ability of OPOs to receive and analyze data in real time, which prevents OPOs from being able to quickly identify trends and adjust practices as needed to

maximize organs transplanted. For example, data surrounding transplant centers' acceptance of extended criteria kidney donors informs OPOs as to how best to allocate such kidneys in a manner that capitalizes on transplanting as many kidneys as possible to save as many lives as possible, but this data is less effective when received 45 days in arrears than it would be if received in real time.

- b. Additionally, UNOS' data system has very limited application programming interface (API), which impacts the ability of OPOs to receive quick, accurate data. For example, MT's internal EMR platform cannot integrate with UNOS' data system because of its limited API. As such, MT employees must manually enter information from MT's platform into UNOS' platform; this increases the risk of error, the financial burden, and is an overall inefficient use of time and resources which could otherwise be spent maximizing donation opportunities to save more lives.
- c. Further, this limited API inhibits the ability of donation and transplantation stakeholders to maximize the use of data to create innovation in transplantation.

MT is grateful for the opportunity to provide comments on the Information Collection Request. MT's mission is to save lives through excellence in organ and tissue donation; that excellence can only be achieved with continuous performance improvement. MT welcomes opportunities for such improvement and for collaboration to ensure that organs and tissues are always available for those who need them and offers to be a resource for further information should it be necessary.

Sincerely,

A handwritten signature in black ink that reads "Diane Brockmeier". The signature is written in a cursive, flowing style.

Diane Brockmeier
President & CEO