

December 23, 2024

Joella Roland
HRSA Information Collection Clearance Officer
Health Resources and Services Administration
US Department of Health and Human Services
Room 14NWH04
5600 Fishers Lane
Rockville, MD 20857

Re: *Information Collection Request Title: Process Data for Organ Procurement and Transplantation Network*, OMB No. 0906-xxxx—New

Submitted electronically at paperwork@hrsa.gov

Dear Officer Roland,

On behalf of Baylor Scott & White Health (BSWH), we appreciate the opportunity to provide feedback to the Health Resources and Services Administration (HRSA), Department of Health and Human Services (HHS) on the Information Collection Request on Process Data for the Organ Procurement and Transplantation Network (OPTN).

BSWH is the largest not-for-profit healthcare system in Texas and one of the largest in the United States with over 1,300 care sites. Our organization employs more than 57,000 employees and affiliates with more than 9,500 physicians, attending to more than 13.5 million patient encounters annually. As a fully integrated delivery system, our accountable care organization and Scott & White Health Plan cover over 1.2 million lives. Our system has hospitals in all three Donation Service Areas (DSAs) in Texas and three transplant hospitals in two different DSAs that would potentially be impacted by this proposal.

HRSA proposes three new data forms to comply with the HHS Secretary's directive to develop improvements to the OPTN organ matching and allocation process. One form as proposed will collect patient data at the point of referral to send to an organ procurement organization (OPO) for potential deceased organ donation. The other two new forms will expand data collection from the point of patient registration, referral, and evaluation at transplant centers. BSWH's comments are focused on the latter two forms.

BSWH is concerned that the current proposal of using individual patient forms to collect data at the point of referral and evaluation will create unnecessary administrative burdens when there is a less burdensome alternative, which is described below. In 2024, the total number of referrals and evaluations across BSWH's three programs was more than 7,600. We estimate that each form represented by these numbers will take 15-20 minutes to complete. This significant increase in workload will require hiring at least one full-time additional staff member.

BSWH recommends that in lieu of adding two forms to individually report on referrals and evaluations, HRSA/OPTN instead follow a procedure that requests data batches quarterly or annually in automated reporting/data uploads. By using appropriate fields that are currently available in the electronic health record (EHR) for these proposed cycles of reporting, the administrative burden would be considerably reduced.

The data that HRSA/OPTN is seeking in this proposal is similar to information that the HHS Office of Inspector General collected in May of 2024 regarding patient selection criteria. That information was collected as a one-time report, rather than completing forms individually for each patient. In a similar manner, HRSA/OPTN could collect data via a single report on a rolling schedule rather than through individual reporting for each instance of referral and evaluation.

In sum, BSWH respectfully requests that HRSA consider an alternative batch reporting approach to permit transplant hospitals to submit data batches quarterly or annually, ideally in automated reporting/data uploads. Such an approach would ease administrative burdens on transplant programs while still supporting HRSA's initiative to collect data from the point of patient registration, referral, and evaluation at transplant centers.

We appreciate the opportunity to engage in a meaningful dialogue with HRSA to achieve mutual goals for the benefit of the patients and communities we serve in a way that is operationally feasible. Should you have any questions or need additional information, please do not hesitate to contact me.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Lisa Athens", written in a cursive style.

Lisa Athens, Chief Risk Officer
Baylor Scott & White Health