

On behalf of Vanderbilt Transplant Center, we appreciate the opportunity to provide feedback on the *Information Collection Request Title: Data System for Organ Procurement and Transplantation Network*, OMB No. 0915-0157-Revision. We support the proposed revisions to existing data collection forms to improve organ allocation and OPTN policy compliance.

We also have feedback regarding the *Information Collection Request Title: Process Data for Organ Procurement and Transplantation Network*, OMB No. 0906-xxxx—New. We largely support new data collection through the proposed pre-waitlist referral and evaluation forms, while having feedback about the best way to accurately and efficiently collect this data:

- Efficiency: each referral and waitlist event should have a trigger that directs sequential data gathering, and applicable data should be carried over throughout multiple forms to reduce redundancy
- Data reporting: we suggest a quarterly data collection cycle with the option to bulk upload required data
- Automatic data collection: we strongly support engagement with electronic health records vendors such as Epic to assist with automatic data collection
- We also suggest the creation of a data governance system, specifically including defined guidelines regarding compliance with these new data collection changes as well as the ability for transplant centers to access their own uploaded data.

In summary, we support both of these proposals and the goals outlined by HRSA in the directive. However, we would like to ensure that their implementation results in a minimal increase in data burden, striving for efficiency while meeting the objectives.