

**From:** [Tankersley, Martha](#)  
**To:** [HRSA Paperwork](#)  
**Subject:** [EXTERNAL] HRSA/OPTN Data collection  
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Good afternoon,

This E-mail is my comment as an affected member of the public on Published Document: 2024-25522 (89 FR 87592), proposed by HRSA on 4 November 2024 regarding additional data collection by the OPTN.

I am writing this as a longtime transplant administrator regarding the data collection for pre-waitlist information on potential transplant candidates. I am submitting this on behalf of myself, not my institution; in full disclosure, I had the opportunity to participate in the meeting of a data subcommittee in early 2024 during which the group was charged with weighing in on what data elements should/could be collected and the barriers in doing so. During (and subsequent to) that meeting, I advocated for minimizing the burden this proposal places on transplant centers, specifically that if it is not withdrawn and does move forward, that there be an annual submission of a single sheet/report per transplant program, NOT thousands of individual forms. Based on our referral volume and waitlist size at our center, we believe multiple incremental FTE would be required to complete this work, and with a very low likelihood of securing incremental resources, this will divert from other more pressing patient care priorities.

It also appears that there are parallel (and perhaps competing) initiatives – the OIG already required transplant centers to submit similar information. So the results of that OIG analysis should be published, and additional study and discussion undertaken before moving this proposal forward. And if it does move forward, should be carried out in a way that truly limits the burden on transplant centers – periodic spreadsheet/report submission and NOT individual patient forms.

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