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To: [HRSA Paperwork](#)
Subject: [EXTERNAL] Information Collection Request Title: Process Data for Organ Procurement and Transplantation Network
Date: Friday, January 3, 2025 8:02:14 AM

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

This comment pertains to the proposed data collection for pre-waitlist transplant candidates and is my opinion as I have worked in transplant for over 17 years. This comment is not being submitted on behalf of my organization.

While I appreciate HRSA's intentions, the proposal does not include a clear, defined purpose, making it an unnecessary burden on transplant centers. Without a clear use for the data, this effort diverts resources from other areas. Working at a large transplant center, we estimate that we will need a full time employee to complete the forms for potential transplant candidates. If the proposal moves forward despite these concerns, it should minimize the burden on transplant centers. Instead of submitting individual patient forms, an annual or semi-annual spreadsheet submission per transplant program would be far less time-consuming and still provide useful data. After that data is collected and evaluated first, any future data collection should be based on demonstrated need, with minimal burden on transplant centers. In conclusion, I urge HRSA to withdraw the proposal. Thank you for the opportunity to share my thoughts.

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