

October 14, 2025

HRSA Information Collection Clearance Officer  
Room 14NWH04  
5600 Fishers Lane  
Rockville, MD 20857

(Sent via [paperwork@hrsa.gov](mailto:paperwork@hrsa.gov))

Re: ICR -- Membership Forms for Organ Procurement and Transplantation Network,  
OMB No. 0915-0184— Revision.

The Association of Organ Procurement Organizations (AOPO) appreciates the opportunity to evaluate the organ procurement organization (OPO) revised application form for the Organ Procurement and Transplantation Network (OPTN).

AOPO collectively represents 46 federally designated, non-profit OPOs in the United States, which together serve millions of Americans. As an organization, AOPO is dedicated to providing education, information sharing, research, technical assistance, and collaboration with OPOs, other stakeholders, and federal agencies to continue this nation's transplantation success while consistently improving towards the singular goal of saving as many lives as possible.

After reviewing the updated application form, AOPO has no substantive concerns or modification recommendations. However, during our review of the application, a question was raised and clarification from OPTN would be appreciated – is a written agreement required between an OPO and its own lab if the two entities operate under separate Centers for Medicare & Medicaid Services (CMS) numbers?

In closing, we recognized the application form is important as it provides key information to determine if the applicant meets OPTN membership requirements. An effective, transparent, and responsive OPTN is vital to improving patient safety and outcomes in the donation/transplant system as well as supporting increased donation and transplantation.

Sincerely,



Jeffrey Trageser  
AOPO President  
Executive Director, Lifesharing