

The Office of Management and Budget
725 17th Street, NW
Washington DC, 20503

October 22, 2024

Thank you for meeting with HonorBridge regarding OPO Performance Metrics. This letter is provided in response to the requests that were made to provide further information:

1. A sample Benchmark Report provided by UNOS to OPOs is attached. Note the description in the introduction of the report states, “The clusters, used as a comparison group along with region and the nation, aim to group DSAs together based on a more holistic and objective measure of similarity using many descriptive factors. The clusters are based on over 60 general characteristics of the DSA, instead of modeling based on outcomes like conversion and yield. The clusters allow an OPO to compare to other OPOs with similar populations and circumstances. This provides OPOs with another perspective for their quality improvement efforts. By incorporating multiple informative characteristics of DSAs together simultaneously, a more complete picture of the DSA is developed, revealing likenesses. Further details of the eight data sources, 60+ characteristics, and methodology used can be found in UNOS Data Portal Documentation.”
2. In our call, I mentioned some curious findings we’ve had around the relationship between our donors and the CMS definition of potential donors (the “denominator”). Our Data Team reviewed our initial findings and internally validated them (as we do for all data we share externally). I’ve provided the 2022 data below as a sample.

HonorBridge receives death certificate data directly from NC Vital Statistics. This allows us to directly map every death to the corresponding referral in our Donor and Referral database. The analyst matched the state death certificate record with our referral/donor record, then analyzed the death certificate data against the CMS “potential donor” definition used as the denominator in our CMS performance measures. The results are below. The “75 and younger” section of the definition may account for a good portion of the discrepancy in the Vented referrals data. However, we did not

have a donor over age 75 in 2022, so the donor row of data cannot be explained by the age portion of the definition. We believe this means the discrepancy must be in the ICD10 code portion of the definition. **With 53.1% of our 2022 donors not meeting the CMS definition of potential donor, this raises serious questions about the generation of the data.**

2022

	Total	Falls within CMS Donor Potential deaths	Falls outside of CMS Donor Potential deaths	Falls within CMS Donor Potential deaths %	Falls outside of CMS Donor Potential deaths %
Vented	4,761	1,050	3,711	22.1%	77.9%
Transplanted	277	130	147	46.9%	53.1%

Please feel free to contact me or our policy advisor, Jen Summa at Jsumma@bakerdonelson.com if you have additional questions.

Sincerely,



Danielle Bumarch, RN, JD
President/CEO