



## ASTS Responses to OPTN Proposals Open for Public Comment

September 28, 2022

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### [Apply Transplant Program Notification Requirements for VCA Program Inactivation](#)

The American Society of Transplant Surgeons (ASTS) is pleased to provide the following feedback to the OPTN VCA Transplantation Committee:

ASTS opposes the proposal to remove the exclusion of VCA programs from *OPTN Bylaw Appendix K: Transplant Program Inactivity, Withdrawal, and Termination*.

Relevant considerations include that the original exclusion was based on low transplant volumes for VCA programs. The latest OPTN/SRTR VCA report continues to demonstrate stability in the annual low volumes of VCA other than uterus of between 2 and 7 cases per year (OPTN/SRTR 2020 Annual Data Report: VCA. Am J Transplant. 2022 Mar;22 Suppl 2:623-647). Similarly, the number of waiting candidates remains low at less than 20 patients each year. The increased complexity of the approval process of VCA programs combined with new inactivity requirements could foreseeably decrease the number of active VCA programs and continue to decrease the availability and patient access to specific VCA programs.

**ASTS Position: Oppose**