



ASTS Responses to OPTN Proposals Open for Public Comment

September 28, 2022

Continued Review of NLRB Policy and Guidance

The American Society of Transplant Surgeons appreciates the opportunity to comment on the Continued Review of NLRB Policy and Guidance.

The proposed creation of guidance for pediatric candidates with CF, specifically the proposed FEV1 thresholds set at less than 70% or greater than or equal to a 5% annual decline.

ASTS largely supports this proposal as written. However, we are concerned that malnutrition in children with cystic fibrosis may be viewed subjectively and may be related to the pancreatic disease they have—not their liver disease. We support the modification regarding failure of treatments for complications and modified guidelines for pulmonary testing.

The proposed changes to guidance for candidates with hepatic adenomas.

ASTS supports the proposal as written.

The proposed changes to guidance for candidates with Budd Chiari.

ASTS supports the proposal as written.

ASTS Position: Support