



American Society of Transplant Surgeons®

*Saving and improving lives with transplantation.*

Sent via email to ACBTSA@hhs.gov

March 7, 2022

Mr. James Berger  
Designated Federal Official  
Office of Infectious Disease and HIV/AIDS Policy  
Office of the Assistant Secretary for Health  
Office of the Secretary  
Department of Health and Human Services  
200 Independence Avenue, SW  
Washington DC 20201

**Re: Request for Information: Regarding a Revision to US Public Health Service Guideline:  
Assessing Solid Organ Donors and Monitoring Transplant Recipients for Human  
Immunodeficiency Virus, Hepatitis B Virus, & Hepatitis C Virus Infection (HHS RFI)**

Dear Mr. Berger:

On behalf of the American Society of Transplant Surgeons (ASTS), I am pleased to have the opportunity to comment on the HHS RFI. ASTS is a medical specialty society representing approximately 1,900 professionals dedicated to excellence in transplantation surgery. Our mission is to advance the art and science of transplant surgery through patient care, research, education, and advocacy.

The HHS RFI proposes to modify the Public Health Service 2020 Guideline to exempt solid organ transplant candidates who are ≤10 years of age at the time of transplant (and who have received postnatal infectious disease testing) from the recommendation for HIV, hepatitis B virus, and hepatitis C virus testing during the hospital admission for transplant (but prior to anastomosis of the first organ). This proposal is based on a recommendation from the Advisory Committee on Blood and Tissue Safety and Availability (ACBTSA) and other input.

ASTS supports this proposal for the reasons set forth in the HHS RFI. In particular, we concur that repeat testing at the time of transplantation might pose potential harm to some pediatric patients due to blood volume loss. In light of the relatively low risk of new HIV, HBV and HCV infections in the pediatric patient population, we concur that repeat screening should not be required.

We appreciate the opportunity to comment on this issue and look forward to continuing to work with the Office of the Assistant Secretary on other transplant-related issues.

Sincerely,

A. Osama Gaber, MD, FACS  
President, American Society of Transplant Surgeons

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**American Transplant Congress**

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