



October 2, 2024

Carole Johnson
Administrator
Health Resources and Services Administration
5600 Fishers Lane
Rockville, MD 20857

Submitted via regulations.gov

Re: Document ID HRSA-2024-0001 Organ Procurement and Transplantation: Implementation of the HIV Organ Policy Equity (HOPE) Act

Dear Administrator Johnson:

On behalf of the more than 2,000 members of the American Society of Transplant Surgeons (ASTS), I appreciate the opportunity to comment on the proposal to amend the National Organ Transplant Act (NOTA) to remove clinical research and institutional review board (IRB) requirements for transplantation of kidney and livers from donors with human immunodeficiency virus (HIV) to recipients with HIV. ASTS is a medical specialty society 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 ASTS fully supports removing the research and IRB requirements, which will facilitate the utilization of HIV+ organs. Furthermore, regardless of whether the proposed rule is adopted, we urge HRSA and HHS to remove the requirement that a transplant team perform at least five HIV+ transplants for **all** HIV+ organs (including heart, lung, and pancreas), since this requirement is not necessary for HIV+ organs to be used safely.

ASTS appreciates the opportunity to comment on this important proposal. If you have any questions, please do not hesitate to contact Emily Besser, ASTS Associate Director, Advocacy, at emily.besser@asts.org.

Respectfully submitted,

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