



Saving and improving lives with transplantation.

American Society of Transplant Surgeons®

October 28, 2019

The Honorable Seema Verma
Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Hubert H. Humphrey Building
200 Independence Avenue S.W.
Room 314G
Washington, DC 20201

Dear Administrator Verma:

As President of the American Society of Transplant Surgeons (ASTS) and on behalf of the patients we serve, I thank the Centers for Medicare and Medicaid Services (CMS) for eliminating one-year outcomes requirements as a condition of Medicare recertification for Transplant Centers. ASTS is a medical specialty society representing approximately 1,800 professionals that is 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.

ASTS has long advocated in favor of the elimination or substantial modification of CMS' Transplant Center outcomes requirements, in light of a growing body of evidence that shows that the imposition of regulatory outcomes requirements on Transplant Centers dissuades the use of less-than-ideal organs, limits access to transplantation, and stymies innovation. We are extremely pleased by CMS' responsiveness to our concerns with respect to this issue. Additionally, we are heartened by the priority that the Administration has placed on increasing the availability of transplantation as a treatment option for ESRD-eligible Medicare beneficiaries. We are hopeful that CMS' leadership in this area will prompt similar action by its sister agency, the Health Resources & Services Administration, to require the elimination of comparable regulatory outcomes requirements which are imposed by two HRSA contractors: the Organ Procurement and Transplantation Network (OPTN) and the Scientific Registry of Transplant Recipients (SRTR). (Post-transplant outcomes requirements are still a condition of OPTN membership and the SRTR continues to utilize outcomes measures as part of its star ratings program.)

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American Transplant Congress

May 30 – June 3, 2020
Philadelphia, Pennsylvania

ASTS looks forward to working with CMS to increase the availability of organ transplantation and to improve patient care. We look forward to actively participating in the Learning Collaborative that is being developed as part of HHS' Kidney Health initiative. Additionally, we would appreciate the opportunity to meet with you and your staff to discuss additional opportunities for the transplant community to advance the objectives of the Administration's Kidney Health initiative. In the interim, please do not hesitate to contact ASTS Advocacy Manager Jennifer Nelson-Dowdy at Jennifer.Nelson-Dowdy@asts.org or 571-447-5447 if we can be of any further assistance.

Thank you once again for your efforts.

Sincerely,

A handwritten signature in blue ink, appearing to read "L. Ratner", is positioned above the typed name.

Lloyd E. Ratner, MD, MPH, FACS
President, American Society of Transplant Surgeons