














# Criteria for Evaluating Potential and Final Measures

As required by the Centers for Medicare & Medicaid Services (CMS), the process has also included the consensus development of criteria for evaluating potential and final measures. As of August 28, 2025, the Organ Procurement Organization (OPO) Stakeholder Group and Technical Expert Panel agreed that potential new OPO performance measures should be:

	Meaningful	Focuses on factors attributable to OPOs that impact the care of donor patients, families, and transplant recipients who receive organs.
	Actionable	Points to specific, controllable actions OPOs can take to improve performance in real time or near real time.
	Feasible to implement	Can be implemented, reported on, and used by OPOs and payors and is not overly burdensome. The cost for implementation of the measure should be realistic.
	An improvement on current measures	Introduces robust metrics that more accurately reflect the OPO role in the donation and transplant process OR will demonstrably fix a problem with the current measures.
	Rigorous	Uses sound scientific principles.
	Evidence-based	Is grounded in literature, data-driven, and validated.
	Replicable	Can be replicated by others seeking to understand how the measurement results were calculated.
	Verifiable	Uses data that are readily available in the event of an audit.
	Reflective of the evolving science and medicine of donation	Promotes new and emerging best practices in donor care and organ management.
	Aligned	Is or has the potential to be aligned with transplant center measures to save more lives. Utilizes risk adjustment, where appropriate, to enable comparison.
	Oriented toward optimizing transplant outcomes	Promotes making more organs available for transplant and discourages organ waste.
	Developed inclusively	Developed with input from a broad range of stakeholders, including patients, donor families, OPOs, and transplant centers.
	Assessed for potential to promote unethical behavior	Does not induce individuals or organizations to seek out organs that will not be used.



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