

March 21, 2023



AOPO Statement on Senate Finance Committee Letters to OPOs on Pancreata for Research

The Association of Organ Procurement Organizations (AOPO) appreciates the interest of the Senate Finance Committee in ensuring the organ donation and transplant system is saving as many lives as possible each year. We also understand the need to ensure the system is operating as intended under the Centers for Medicare and Medicaid Services' (CMS) new rule adopted in 2021, which set new performance measures for organ procurement organizations (OPO).

Under the new rule, a donor is defined as “a deceased individual from whom at least one vascularized organ is transplanted, not just procured for transplant, or an individual from whom a pancreas is procured and is used for research.” During the initial rulemaking process, AOPO raised concerns to CMS about including pancreata utilized for research in the data calculation to determine OPO performance as it could skew comparisons of OPOs in that category and potentially lead to inaccurate conclusions.

Nonetheless, OPOs have been operating according to the rule since it was adopted in 2021, as well as all other federal and industry guidelines regarding the recovery and distribution of organs. In 2022, OPOs continued to recover as many organs as possible for the purpose of transplant, resulting in a [4.6% increase in organs transplanted from deceased donors](#) over a single year. This number does not include pancreata that were recovered for research.

If a recovered pancreas is made available for transplant and not transplanted, OPOs find research opportunities to ensure the organ does not go to waste and the donor’s gift is honored. The option to donate to research in lieu of transplant can also be a comfort to donor families in their time of grief, knowing their loved one’s organs can still help someone indirectly through research.

AOPO urges members of the Senate Finance Committee to explore other reasons why more organs may be allocated to research, including the increase in non-utilization of organs for transplant. The need for more transplants is one of the most pressing issues in healthcare today. In 2022, despite the increase in the number of organs OPOs recovered, 19% of those were not transplanted. These organs were either donated to research or disposed. By using recommendations proposed in the [National Academies of Sciences, Engineering, and Medicine report](#) to solve the non-utilization of organs, the Senate Finance Committee could help save the lives of thousands of patients on the transplant waiting list each year.

AOPO and its member OPOs are working to increase the number of lives saved through our [50,000 annually organ transplants in 2026 goal](#), focused on expanding collaboration, improving equity, maximizing organ utilization, and driving innovation and research. We stand ready to work with the Senate Finance Committee and other stakeholders to save more lives.