



September 19, 2023

**OPTN Summer Comment Period: Remove CPRA 99-100% Form for Highly Sensitized Kidney Candidates**

On behalf of the nearly 90,000 patients on the national kidney transplant waitlist, including those who are highly sensitized, the National Kidney Foundation (NKF) thanks the Organ Procurement and Transplantation Network (OPTN) for the opportunity to offer commentary on the policy proposal to *Remove CPRA 99-100% Form for Highly Sensitized Kidney Candidates*, presented by the Histocompatibility Committee.

We applaud OPTN and the Histocompatibility Committee for recognizing the importance of removing administrative barriers that could potentially delay highly sensitized patients from receiving a life-saving kidney transplant. This population of patients often endure long wait times, especially when living donation is not an option.<sup>1</sup> Thus, we support eliminating documentation hurdles that would cause patients with high-calculated panel reactive antibodies (cPRA) to miss appropriate yet rare kidney offers. We would like to suggest a post-implementation plan that includes evaluating if there is improvement in time to listing for these patients.

NKF appreciates the OPTN for making kidney transplantation more accessible for highly sensitized patients. Please get in touch with Morgan Reid, Director of Transplant Policy and Strategy, at [Morgan.Reid@kidney.org](mailto:Morgan.Reid@kidney.org) if we can support this endeavor further.

Sincerely,

Kevin Longino  
CEO and Transplant Patient

Sylvia E. Rosas MD, MSCE  
President

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<sup>1</sup> Keith DS, Vranic GM. Approach to the Highly Sensitized Kidney Transplant Candidate. Clin J Am Soc Nephrol. 2016 Apr 7;11(4):684-93. doi: 10.2215/CJN.05930615. Epub 2016 Feb 25. PMID: 26915916; PMCID: PMC4822662.