



March 14, 2023

Re: OPTN Policy Proposal, Organ Offer Filters

The National Kidney Foundation (NKF) thanks the Organ Procurement and Transplant Network (OPTN) for the opportunity to offer commentary on the policy proposal, *Optimizing Usage of Organ Offer Filters*, presented by the Operations and Safety Committee.

NKF is deeply concerned with the increasing kidney discard rate and equity in access to kidney transplantation. We support initiatives to expedite the placement of recovered kidneys and increase organ utilization to ensure more people are transplanted and fewer organs are wasted. Studies have shown that cold ischemia time can potentially lead to delayed graft function and the non-transplantation of procured kidneys.^{1,2} Equity in access is not achieved at the cost of transplanting fewer organs. It is critical that OPTN balance utility and equity in kidney transplantation and continuously evaluate the efficacy of organ filter usage.

We urge OPTN to ensure transplant centers educate referring providers and, most importantly, patients on organ filters. Patients frequently request greater transparency and honest communication about the transplant process, especially as patients assess which transplant center suits them best. A conversation about organ offer filters can occur during the evaluation process and be communicated to the patient in the listing letter patients receive when they become active on the transplant waitlist. The use of organ filters should undoubtedly be prioritized in the shared decision-making process between transplant programs and their patients.

“The barrier I found stressful for me while waiting over 8 years to receive a kidney was not being updated on my place in line. While I made several bi-yearly medical evaluations to maintain my status on the waiting list, no one could tell me my place in line. After eight years, with six years on the waitlist, I was blessed to receive a call in January 2022.”

T. Brittian, NKF Advocate

¹ Nieto-Ríos, J F et al. “Time of Cold Ischemia and Delayed Graft Function in a Cohort of Renal Transplant Patients in a Reference Center.” *Indian journal of nephrology* vol. 29,1 (2019): 8-14. doi:10.4103/ijn.IJN_162_18

² Kayler, L K et al. “Impact of cold ischemia time on graft survival among ECD transplant recipients: a paired kidney analysis.” *American journal of transplantation : official journal of the American Society of Transplantation and the American Society of Transplant Surgeons* vol. 11,12 (2011): 2647-56. doi:10.1111/j.1600-6143.2011.03741.x



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The National Kidney Foundation thanks OPTN for endeavoring to increase organ utilization and advance technology to improve organ acceptance behaviors. Please contact Morgan Reid, Director of Transplant Policy and Strategy (morgan.reid@kidney.org), if there are opportunities for NKF to support this initiative further.

Sincerely,

Kevin Longino
CEO and Transplant Patient

Sylvia Rosas, MD, MSCE, KNKF, FASN
President