



September 19, 2023

OPTN Summer Comment Period: Require Reporting of Patient Safety Events

The National Kidney Foundation (NKF) appreciates the opportunity to comment on the policy proposal to *Require Reporting of Patient Safety Events* presented by the Organ Procurement and Transplant Network's (OPTN) Membership and Professional Standards Committee (MPSC).

NKF is a steadfast proponent of transparency and patient-centricity. We support the proposal to require organ procurement organizations and transplant centers to report patient safety events to the MPSC, aligning with the OPTN reporting requirements of safety events to MPSC leadership and the Health Resources and Services Administration (HRSA). We endorse organ procurement organizations reporting ABO discrepancies, which could cause significant harm to patients. By broadening patient safety reporting requirements for living donors who become waitlisted for a kidney transplant two years post-living donation, OPTN will create an opportunity to study short-term effects to improve living donation outcomes.

We also support reporting transportation errors that lead to organ non-utilization. With nearly 90,000 individuals waiting for a kidney transplant, hundreds of thousands of people with kidney failure, and the demand for donated organs far outpacing the supply, it is critical that the OPTN prioritize solutions to maximize every opportunity for organ donation and transplantation, including transparent reporting of all "never" and "near-missed" patient safety events to mitigate future errors and threats to patient safety and public health. Moreover, the lack of transparency and appropriate remediation in the reporting process is dishonorable to those who generously decide to become organ donors. Lastly, we encourage OPTN to determine how it will monitor and enforce compliance.

NKF thanks OPTN for its efforts to prevent safety errors for transplant patients and enhance data collection to improve living donation outcomes. Please contact Morgan Reid, Director of Transplant Policy and Strategy, at Morgan.Reid@kidney.org if we can support this endeavor further.

Sincerely,

Kevin Longino
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