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Comments Received :

As a stakeholder in the transplant community, I am writing to express my concerns regarding the proposed new data collection forms intended to expand reporting at the point of referral and evaluation for organ transplantation. While I support efforts to improve transparency, reduce disparities, and enhance system performance, I strongly oppose the current proposal due to the excessive burden it places on already overstretched transplant teams and OPOs.

The estimated 252,216.84 annual burden hours are alarming and highlight the significant administrative impact this proposal will have on frontline providers. The time and resources required to implement, train staff, and maintain compliance with these new requirements will inevitably divert attention away from direct patient care and the critical work of organ recovery and transplantation. This is especially problematic in an environment where teams are already strained and burnout is high.

Although I recognize the intent behind collecting more pre-waitlist and referral data, the scope and scale of this proposed information collection are not feasible without significant investment in infrastructure and staffing — which many programs currently lack. Without additional funding or support, this will amount to an unfunded mandate that may disproportionately affect smaller or resource-limited centers, like mine.