



July 31, 2025

Thomas J. Engels
Administrator
Health Resources & Services Administration
U.S. Department of Health and Human Services
Attention: OMB No. 0906-xxxx-New
5600 Fishers Lane
Rockville, MD 20857
Via electronic submission to: <https://www.regulations.gov>

Re: Agency Information Collection Activities: Submission to OMB for Review and Approval; Public Comment Request; Process Data for Organ Procurement and Transplantation Network (OPTN), OMB No. 0906-xxxx-New

Dear Administrator Engels:

Baylor Scott & White (BSW) appreciates the opportunity to provide feedback on the OPTN Process Data Information Collection Request submitted to OMB by the Health Resources & Services Administration (HRSA).

As the largest not-for-profit health system in Texas, BSW is focused on empowering customers to live well by delivering convenient, personalized, informed care experiences. BSW appreciates the hard work and expertise required by HRSA to implement and oversee the OPTN. BSW's position is that the proposed information collection request exacerbates administrative burdens for providers with no patient benefit, and counteracts the federal government's deregulatory and cost-efficiency efforts by generating operational inefficiencies within OPTN.

HRSA's proposed collection of individual patient forms to obtain data at the point of referral and evaluation will immediately double the number of forms BSW processes. BSW anticipates that the increased administrative workload would necessitate hiring multiple new non-clinical FTEs. The diversion of resources from clinical to administrative objectives would inhibit both BSW's mission of delivering convenient, personalized care and the federal government's goals of deregulation and cost-efficiency. BSW proposes submitting batch referral and evaluation data on a quarterly, semi-annual, or annual basis rather than in real time patient-by-patient. This would facilitate enhanced transparency and accountability for OPTN and protect vital BSW resources from additional administrative burden. If the proposed information collection request proceeds, BSW requests that HRSA align the implementation timeline of the proposed request with the stakeholders' ability to establish automated data collection methods.

BSW appreciates this opportunity to provide feedback to HRSA. Reducing regulatory burdens will enable our system to deliver quality, convenient, personalized, and informed care experiences to our customers. The BSW partnership with HRSA is invaluable, and if you have any questions regarding these comments to the proposed IPPS rules, BSW would be happy to answer them.

Sincerely,

A handwritten signature in black ink, appearing to read "Lisa Athens".

Lisa Athens, J.D.
SVP Chief Risk Officer



301 N. Washington Ave. | Administration Bldg. 4th floor | Dallas, Texas 75246
214-820-9982 Office | 214-820-2384 Fax
lisa.athens@BSWHealth.org