

September 25, 2026

HRSA Information Collection Clearance Officer
5600 Fishers Lane
Room 13N82
Rockville, Maryland 20857
(sent via paperwork@hrsa.gov)

Re: Information Collection Request: Organ Procurement and Transplantation Network Board of Directors and Committee Member Applications and Forms, OMB No. 0906-New

The Association of Organ Procurement Organizations (AOPO) appreciates the opportunity to provide comments in response to the “Information Collection Request: Organ Procurement and Transplantation Network Board of Directors and Committee Member Applications and Forms, OMB No. 0906-New” published in the *Federal Register* by Health Resources and Services Administration on August 6, 2026.

AOPO collectively represents 45 federally designated, non-profit Organ Procurement Organizations (OPOs) in the United States, which together serve millions of Americans. As an organization, AOPO is dedicated to providing education, information sharing, research, technical assistance, and collaboration with OPOs, other stakeholders, and federal agencies to continue this nation’s transplantation success while consistently improving towards the singular goal of saving as many lives as possible.

Volunteers play a vital role within the Organ Procurement and Transplantation Network (OPTN). Therefore, it is important for the application forms for volunteers who want to serve on the OPTN Board and committees capture their experience and expertise. When properly utilized, volunteers help OPTN develop policies and initiatives that advance donation and transplantation and ultimately save lives.

Below is a chart that identifies areas on the draft forms that are unclear or could be improved.

Thank you for your consideration,



Allison J. Erickson, MBA, SPHR, SHRM-SCP
AOPO President
Chief Administrative Officer
New England Donor Services

Form 1: OPTN Board of Directors Volunteer Interest Form	Comment
Question 11	This question could require an applicant to disclose confidential information about its employer. An applicant should not be precluded from serving based solely if his/her employer is subject to regulatory discipline.
Question 17a	Clarifications are needed: (1) While OPOs have historically been identified as a single entity, it would be beneficial to break out the OPO applicant's responsibilities (i.e., administrative vs. clinical) as each provides distinct experience and expertise. (2) Regarding the question about which transplant programs the applicant has been involved with, should the applicant list the programs supported by the OPO or is it not applicable for procurement roles?
Question 18a	Need to clarify organ donor vs. living donor
Question 18b	When applicant is a family member of a deceased donor, questions b, c, & d are not applicable and can be confusing. Questions f, g, h, j could include organ donation advocacy for the potential donor family member. Otherwise, these questions are N/A and potentially confusing. Additionally, these questions indicate that the board is seeking experienced professionals who are also recipients or donor family members, rather than indicating that the perspective of a donor family member or transplant recipient is sufficient. Questions may discourage applicants that lack outreach or advocacy experience but are willing to share their perspective. Opportunity to get a donor family or transplant patient perspective from an interested and willing volunteer may be lost. If experience is the intended baseline, these questions may have value.
Question 37	What is the justification for requesting for the applicant's social media usernames or handles? It is concerning if it will be used to

	screen out applicants with views divergent from current OPTN and/or HRSA leadership as there should be a diversity of opinions represented. Although a response is listed as optional, what is the practical effect of not providing the information?
Form 2: OPTN Committee Volunteer Interest Form	
Question 31	Should an OPO employee list the programs supported by the OPO or is it N/A for procurement roles? Clarification is needed.
Form 3: OPTN: Annual Conflict of Interest (COI) Disclosure Questionnaire	
Section 3, Question 1	How is this information to be used and its use monitored to ensure that its use does not result in the screening of applicants with views diverse from current HRSA and/or leadership? Prior OPTN volunteer service should not be perceived as a conflict of interest.
Section 3, Question 4	This question is overly broad and should be limited to a direct interest that is not <i>de minimis</i> , e.g., more than a five percent interest, not as part of a general fund investment.
Section 3, Question 6	How will this information be used to screen out applicants? How will the use of this information be monitored to ensure it is not used to screen out applicants with diverse viewpoints, which are critical to developing policy.
Form 4: OPTN Conflict of Interest Disclosure: Quarterly Update	
Overall form	Typical conflict of interest processes require an initial and annual filing with a requirement that a participant submit an updated form anytime there is a change. We recommend a reminder to file any changes in the interim between annual filings instead of the proposed filing schedule.