

Position Statement on Patient Access to Transplantation Services

The American Society of Transplantation (AST), American Society of Transplant Surgeons (ASTS), and National Kidney Foundation (NKF) are committed to advancing the field of organ transplantation and advocating for policies that enhance patient access to vital transplant services. We recognize the critical importance of timely and equitable access to transplantation for patients in need. In light of this mission, we present the following positions:

1. **Support for Multiple Listing:** The AST, ASTS and NKF strongly support the ability for patients to be listed for transplantation at multiple transplant centers. This practice enhances patient autonomy and enables individuals to access a wider range of available organs as well as programs with willingness to take on candidates with higher medical complexity. Multiple listing can significantly reduce waiting times, improve matching opportunities, and ultimately save lives. We believe that this approach not only benefits patients but also promotes healthy competition and excellence among transplant programs.
2. **Simultaneous Evaluations for Living Donors:** The AST, ASTS, and NKF advocate for the approval of simultaneous evaluations of living donors. Currently, the evaluation process often requires multiple sequential assessments before living donor candidacy is definitively determined. A significant delay in care can result when multiple potential living donors are involved and one donor is not allowed to start the evaluation process until a decision is rendered on another donor. By allowing for simultaneous donor evaluations, programs can streamline the evaluation process, reduce wait times, and facilitate quicker access to transplantation for recipients. This approach not only results in better patient outcomes but is also more cost-effective. Given that the average recipient may have four donors evaluated, this change has the potential to dramatically increase the efficiency of living donation.
3. **Transplant Approval Outside of Payer Networks:** The AST, ASTS, and NKF support the approval of transplant procedures performed outside of payers' networks and Centers of Excellence (COEs) when warranted by patient circumstances. Situations including patient hardship, geographic barriers, challenges in accessing care, and unique clinical co-morbidities or the need for emergent care for critically ill patients often necessitate flexibility in the standard approval process. By enabling exceptions under these circumstances, this will ensure that all patients receive equitable access to transplantation, regardless of their geographic location or financial constraints.
4. **Parity in Coverage Among Payers:** The AST, ASTS, and NKF emphasize the need for Medicare Advantage (MA) payers to provide coverage that is equivalent to the traditional Fee-for-Service (FFS) plans. Comprehensive coverage, particularly concerning post-donation complications, is essential to support the long-term welfare of both living donors and recipients. The disparities in coverage can create significant barriers to care and undermine the success of transplant outcomes. It is vital that all payers align their policies to safeguard patient health and well-being.

In conclusion, the American Society of Transplantation, American Society of Transplant Surgeons (ASTS), and National Kidney Foundation (NKF) reaffirm our commitment to promoting policies that enhance access to transplantation services for all patients. By supporting multiple listing, simultaneous evaluations, flexibility in network requirements, and equitable coverage, we can collectively work towards a transplantation system that is fair, efficient, and ultimately more



successful in meeting the needs of patients. Together, we are committed to a future where every patient has access to the life-saving organ transplant they deserve.

For further information, contact AST's Bill Applegate, BApplegate@polsinelli.com; ASTS's Peggy Tighe, Peggy.tighe@powerslaw.com; or NKF's Morgan Reid, morgan.reid@kidney.org.