



Legislative and Regulatory Update

June/July 2014

ASTS Comments on IPPS/Mitigating Circumstances Process

On June 30, ASTS submitted comments to CMS regarding the Inpatient Prospective Payment System Proposed Rule for Medicare. ASTS suggested several alterations to the proposed changes to the “mitigating circumstances” criteria and processes available to transplant centers. [You can read the comments in their entirety here.](#)

Liver Allocation Changes

The OPTN/UNOS Liver and Intestinal Organ Transplantation Committee recently released a concept paper on changes to the current liver allocation policy. The [concept paper on the OPTN website](#) includes a questionnaire where you can provide feedback, which UNOS will use to develop a public forum in September to discuss the concepts in the paper and seek additional input from stakeholders.

ASTS encourages you to review the document and submit comments to OPTN/UNOS after evaluating the proposal based on the data used by the committee and your thoughts on how to best minimize deaths on the waiting list without negatively impacting survival.

OPTN Board Meeting Update

The OPTN/UNOS Board of Directors, at its meeting June 23 and 24, unanimously approved the first national policies and standards for transplantation of limbs, faces and other structures collectively known as vascularized composite allografts (VCAs). The requirements will be in effect for 15 months, allowing the transplant network during that time to seek public comment regarding potential improvements.

The Board also approved amendments to heart allocation policy for pediatric candidates; adopted a recommendation to the Health Resources and Services Administration that the OPTN/UNOS Kidney Paired Donation

Pilot Program should become a permanent function of the OPTN; approved minimum requirements for living liver donor transplant programs to report post-operative outcome data on those donors at intervals up to two years from the donation; and approved on a permanent basis a policy change allowing transplant programs to request additional, exceptional priority for adolescent or adult donor lung offers for transplant candidates age 11 or younger.

[To read more about the results of the OPTN/UNOS Board meeting, click here.](#)

Liver Code Survey Underway

CMS has requested review of surgeon work for CPT code 47135 (liver transplantation). Last week, an AMA/RUC survey was emailed to ASTS members to capture information about surgeon work. If you received this survey request, please respond to the survey request by Monday, July 14, 2014. If you have any questions or would like more information, contact laurie.kulikosky@asts.org.

How You Can Help

ASTS relies on its members to bring to our attention issues related to transplantation at the state level. If you are aware of state policies or actions that impact access to transplantation or other challenges for your patients, please let us know at asts@asts.org.

Online Resources

Webcasts of the sessions from the ASTS 14th Annual State of the Art Winter Symposium, including the Legislative Update and Advocacy Symposium, are [available free of charge here](#).

All issues of the ASTS Legislative and Regulatory Update are now [archived on the ASTS website](#).