



December 13, 2024

Ms. Christine Jones
Director, OPTN Board Support
American Institutes for Research
1400 Crystal Drive, 10th Floor
Arlington, VA 22202

Delivered Electronically

Dear Ms. Jones,

We as the leadership of the American Society of Transplant Surgeons (ASTS) thank you for the invitation to provide feedback regarding the candidate criteria for the Transitional Nominating Committee and for the new OPTN Board. ASTS is a medical specialty society representing approximately 2,000 professionals dedicated to excellence in transplantation surgery. Our mission is to advance the art and science of transplant surgery through patient care, research, education, and advocacy.

ASTS continues to urge AIR to follow a process for selection of the Transitional Nominating Committee that is consistent with the requirements set forth in the OPTN Revised Bylaws and Membership and Management Policy (Governing Policy), which were only recently reviewed and approved by HRSA. The strength of the process outlined in the OPTN Revised Bylaws and Governing Policy is the broad representation of the transplant community, the needs assessment performed by an experienced OPTN Board as part of the nominations process and the election of the OPTN Board of Directors by the membership in a clearly defined process that includes Regional Councilors that are locally selected and representatives of medical/scientific organizations like the ASTS. Based on recent communications with the transplant community, we urge AIR and/or HRSA to provide public assurance that OPTN members will have the same voting rights for the Special Election as for any other Board election.

Under the Bylaws and Governing Policy, each professional association member of the OPTN (including ASTS) has the right to select a member of the Board. In addition, a Board member is selected by the OPTN members of each of the OPTN's 11 Regions to represent that Region on the Board, and these Regional representatives run unopposed. We believe that, if AIR determines that the nominations or Board election processes described in the Revised Bylaws and Governing Policy is inappropriate for the Special Election, these documents should be formally amended, and the process and the rationale for these departures from current requirements should be made transparent to the community and to the public at large.

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We recommend that the transplant community submitted nominees and nominee/candidate criteria be 1) utilized in accordance with the OPTN bylaws-specified governance procedures and 2) publicly posted within 2-3 weeks after the deadline for nominee/candidate criteria submission.

Both NOTA and the Final Rule include specific requirements with respect to the composition of the OPTN Board, and we believe that the composition of the Transitional Nominating Committee should reflect these requirements. Specifically, the Final Rule requires that approximately 50% of the Board consists of physicians. As transplant surgeons are involved in all aspects of organ donation and transplantation, we strongly believe that a sufficient number of transplant surgeons actively engaged in transplantation should be on the Transitional Nominating Committee and that the final Board slate should be balanced with respect to physician representation.

In determining the composition of both the Transitional Nominating Committee and the Board, we understand and support the effort to avoid conflicts of interest; however, it is important not to conflate conflict of interest with expertise. OPTN volunteers have a commitment and understanding of the transplant system that brings crucial value to the Board. In determining the slate of candidates, we believe that the Transitional Nominations Committee should consider OPTN Board and committee volunteer experience as a valuable criterion along with other factors to facilitate selection of a new Board of Directors that has institutional knowledge and can facilitate a smooth transition but also provides an opportunity for new perspectives.

Below are the criteria ASTS recommends as critical to have a strong and relevant Transitional Nominating Committee and OPTN Board of Directors.

Criteria for Transitional Nominating Committee Member

Demographics

- Geographic diversity
- Gender diversity
- Minority representation
- Healthy equity experience
- Actively Practicing Transplant Professionals

Transplant Experience

- Transplant Leadership Experience (transplant professional organizations such as ASTS, AST, ASHI, AOPO, NATCO etc.)
- Clinical Transplant Experience (see Table below)
- Transplant Center Leadership and health system interactions
- Transplant Interactions with government agencies and/or contractors (HRSA, CMS, CDC, FDA, NIH, SRTR, etc.)
- Transplant Research & Innovation
- Transplant Quality & Safety (Transplant Education & Training)

- Organ procurement organization professional
- HLA (tissue typing) professional
- Nurse manager or administrator for transplant center (knowledge of transplant center transplant coordinator and other staffing needs, community outreach, hospital administration interactions, program quality metrics and reporting)
- Transplant Professional volunteer service with OPTN Board and committees

Key Qualifications & Transplant Clinical Practice Experience

<p>ASTS - TACC Certified Transplant Surgeon</p>	<p>Transplant Center Leadership Experience</p> <p>Living Donor Surgery Focus of Practice</p> <p>Abdominal Organ Procurement Focus of Practice</p>
<p>ASTS - TACC Certified Abdominal Transplant Surgeon</p>	<p>Adult Kidney Transplant Focus of Experience</p> <p>Adult Liver Transplant Focus of Experience</p> <p>Adult Pancreas Transplant Focus of Experience</p> <p>Pediatric Transplant Focus of Experience</p>
<p>Cardiothoracic-trained Surgeons</p>	<p>Thoracic Organ Procurement & Transplant (Heart, Lung) Surgery Focus of Practice</p>
<p>Medical Practitioners Actively Engaged in Transplantation</p>	<p>Transplant Infectious Disease Focus of Practice</p> <p>Transplant Nephrology Focus of Practice</p> <p>Transplant Hepatology Focus of Practice</p> <p>Transplant Cardiology/Pulmonology Focus of Practice</p>

Criteria for OPTN Board of Directors

(Same as above.)



ASTS

American Society of
Transplant Surgeons

We sincerely thank AIR for the opportunity to provide feedback regarding the Transitional Nominating Committee and Special Election. We look forward to a continuing dialogue on this critically important issue.

Respectfully,

Ginny L. Bumgardner, MD, PhD
President