March 3, 2022

United Network for Organ Sharing
publiccomment@unos.org

On behalf of the American Nephrology Nurses Association (ANNA), thank you for allowing us the opportunity to comment on the Organ Procurement and Transplantation Network (OPTN) Public Comment Proposals- Winter 2022 (Due March 23, 2022). Our comments for several of the current policy proposals are as follows:

**OPTN Standards for Public Comment- Winter 2022 (Due 03/23/2022)**

**Pediatric Candidate Pre-Transplant HIV, HBV, and HCV Testing**
ANNA supports with consideration of weight vs age and with set parameters on time frame for testing prior to transplantation.

**Establish Eligibility Criteria and Safety Net for Heart-Kidney and Lung-Kidney Allocation**
ANNA supports this proposal and agrees with establishing eligibility criteria and prioritization for safety net.

**Redesign Map of OPTN Regions**
ANNA needs more information regarding risks and benefits before commenting or choosing an option on this project.

**Proposal to Revise the OPTN Charter**
ANNA supports

**Reinstatement of Updates to Candidate Data During the COVID-19 Emergency**
ANNA supports and appreciates this consideration.

**Change Calculated Panel Reactive Antibody (CPRA) Calculation**
ANNA supports

**Establish Minimum Kidney Donor Criteria to Require Biopsy**
ANNA supports
Modify Living Donor Exclusion Criteria
ANNA supports and agrees with concern for safety while allowing more autonomy to transplant hospitals.

Establish OPTN Requirement for Race-Neutral eGFR Calculations
ANNA strongly supports

Sincerely,

Diane Derkowski, MA, RN, CNN, CCTC
ANNA Transplant Specialty Practice Network (SPN) Best Practice Advisor
ANNA – OPTN/UNOS Representative

cc: Lillian Pryor, Board Liaison
    Dave Walz, National President
    Tamara Kear, Executive Director
    LouAnn Leary, Director of Association Services