



UnityPoint Health

Government and External Affairs  
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March 31, 2026

Administrator Mehmet Oz, M.D.  
Centers for Medicare and Medicaid Services (CMS)  
Department of Health and Human Services  
Attention: CMS-3409-P  
P.O. Box 8010  
Baltimore, MD 21244-8010

RE: CMS-3409-P – Medicare and Medicaid Programs; Organ Procurement Organizations Conditions for Coverage: Revisions to the Conditions for Coverage, published at Vol. 91, No. 20 Federal Register 4190-4251 on January 20, 2026.

*Submitted electronically via <http://www.regulations.gov>*

Dear Administrator Oz,

UnityPoint Health appreciates this opportunity to provide comments on the proposed rule related to Organ Procurement Organizations Conditions for Coverage. Iowa Methodist Medical Center, a senior affiliate of UnityPoint Health, is located in Des Moines, Iowa, has performed kidney transplants for more than 30 years, has the Iowa Donor Network as our Organ Procurement Organization, and is an IOTA Model participant. UnityPoint Health is one of the nation's most integrated health care systems. Through more than 29,000 employees and our relationships with more than 390+ physician clinics, 36 hospitals in urban and rural communities, and 12 home care areas of service across our 8 regions, UnityPoint Health provides care throughout Iowa, central Illinois, southeastern South Dakota, and southern Wisconsin. On an annual basis, UnityPoint Health hospitals, clinics, and home health agencies provide a full range of coordinated care to patients and families through more than 8 million patient visits.

UnityPoint Health appreciates the time and effort of CMS in revising the Organ Procurement Organizations Conditions for Coverage. The vision of UnityPoint Health and Iowa Methodist Kidney Transplant Center (IAIM) is "best outcome, every patient, every time." **In 30 years, IAIM performed 1430 kidney transplants.** Our small rural Transplant Center has historically had a small waitlist with a higher risk population, including elderly patients and patients with elevated BMI and histories of smoking and vascular/cardiovascular disease. Nearly all our transplant recipients reside within 250 miles of our center. In the evolving regulatory landscape of the past five years, we are proud that IAIM has not been flagged for graft or patient survival metrics, has held a steady transplant rate, and has had many successful UNOS and CMS site surveys with no citations. **UnityPoint Health is supportive of Iowa Donor Network (IDN) as our Organ Procurement Organization and generally agrees with IDN's formal comment letter to this proposed rule.** As an interested stakeholder, we respectfully offer the following input.

## GENERAL COMMENTS

*CMS proposes to revise the Conditions for Coverage for Organ Procurement Organizations (OPOs) to clarify outstanding procedural questions and enable OPOs to make better informed decisions to achieve high performance resulting in the successful procurement, distribution, and transplantation of more life-saving organs. This proposed rule does not revise the focus on improving the volume of donors and transplants assessed in the outcome measures or the tier structure used for re-certification and de-certification of OPOs.*

**Comment:** Like IDN, UnityPoint Health strongly supports CMS’s overarching objective to improve organ donation and transplantation outcomes, which are critical to saving lives and strengthening the nation’s transplant system. While we support organ donation quality and safety goals, we are concerned that this proposed rule continues to rely on unadjusted outcome measures that do not adequately reflect meaningful differences among OPO service areas, including variation in medical complexity, geography, hospital characteristics, and donor populations. Performance measurement approaches that do not account for these factors risk creating incentives to avoid more complex donors and may inadvertently reduce overall organ donation and transplantation rates.

Organ donation and recovery depend fundamentally on public trust and strong, stable relationships between OPOs, hospitals, clinicians, and donor families. Policies that could result in widespread reassignment of OPO service areas or abrupt organizational disruption—particularly when driven by performance metrics that may not fairly represent OPO performance—risk undermining that trust. **Stability within donation systems is essential** to ensuring donor families are supported appropriately and that organs are not lost due to operational disruption.

Rather than relying primarily on competition-based approaches and service area reassignment, **CMS should prioritize OPO performance improvement strategies that strengthen the existing system.** These include the use of technical assistance, corrective action plans, and validated, risk-adjusted performance measures. Such approaches are more likely to drive sustainable improvement while preserving system stability and maintaining public confidence in the organ donation process.

## ADDITIONAL COMMENTS – ORGAN ALLOCATION AND TRANSPLANT VOLUME

*In December 2022, CMS published the final rule, “Medicare and Medicaid Programs; Organ Procurement Organization Conditions for Coverage: Revisions to the Outcome Measure Requirements for Organ Procurement Organizations” (85 FR 77898), including revised outcome measures to drive performance improvement and increase the number of transplantable organs. Since publishing the December 2020 final rule, CMS has received many inquiries from OPOs and others seeking clarification on operational and administrative elements.*

**Comment:** UnityPoint Health is disappointed that CMS chose not to revisit its methodology and incentives to increase transplant volumes. For a small rural Transplant Center with a small waitlist and higher risk population, these allocation changes have resulted in declining “quality” organ offers. For further details, we encourage CMS to review our comment letter to CMS-5544-P<sup>1</sup>.

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<sup>1</sup> IOTA2026\_UnityPoint Health\_2.9.26.pdf to CMS-2025-1690-0001 submitted via Regulations.gov (tracking number:

We are pleased to provide input on this proposed rule and its impact on Iowa Methodist Medical Center, our beneficiaries, and communities served. To discuss our comments or for additional information on any of the addressed topics, please contact Cathy Simmons, Executive Director, Government & External Affairs at [cathy.simmons@unitypoint.org](mailto:cathy.simmons@unitypoint.org) or 319-361-2336.

Sincerely,



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