

December 12, 2011

Gabriel M. Danovitch, MD
Chair, Ad Hoc International Relations Committee
United Network for Organ Sharing
700 North 4th Street
Richmond, Virginia 23219

Alexandra K. Glazier
Chair, Ethics Committee
United Network for Organ Sharing
700 North 4th Street
Richmond, Virginia 23219

Dear Dr. Danovitch and Ms. Glazier:

On behalf of the American Society of Nephrology (ASN), thank you for the opportunity to comment on the United Network for Organ Sharing (UNOS) "Proposed Revisions to and Reorganization of Policy 6.0 (Transplantation of Non-Resident Aliens), Which Include Changes to the Non-Resident Alien Transplant Audit Trigger Policy and Related Definitions."

Founded in 1966, ASN has more than 13,000 members, including physicians, scientists, other health care providers, and nephrology fellows in the United States and abroad. The society's mission is "to educate health professionals, share new knowledge, advance research, and advocate the highest quality care for patients." Foremost among ASN's concerns is the preservation of equitable patient access to optimal quality kidney transplantation care and related services regardless of geographic location or demographic characteristics.

ASN appreciates UNOS's dedication to ensuring appropriate oversight of the allocation system in order to maintain public trust. The society is committed to fighting transplant commercialism, transplant tourism, and organ trafficking. For example, ASN has signed the "Declaration of Istanbul on Organ Trafficking and Transplant Tourism." Transparency regarding the citizenship and residency of transplant recipients is an important component of maintaining an equitable organ allocation system.

ASN supports the changes proposed by the UNOS Ad Hoc International Relations and Ethics Committees to UNOS Policy 6.0. Evaluating the extent to which patients are traveling to the United States for deceased donor transplantation is a reasonable goal that will increase public transparency.

ASN appreciates UNOS's willingness to consider these comments regarding the Proposed Revisions to and Reorganization of Policy 6.0. Committed to providing the best possible care for kidney transplant patients, the society's members believe that the changes proposed will facilitate transparent and equitable allocation. ASN stands ready to discuss its support for these proposed changes with UNOS if it would be helpful. The society welcomes the opportunity to continue to collaborate with UNOS in future years.

Again, thank you for your time and consideration. To discuss ASN's comments, please contact ASN Policy and Government Affairs Manager Rachel N. Shaffer at (202) 640-4659 or rshaffer@asn-online.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Ronald J. Falk". The signature is fluid and cursive, with the first name "Ronald" and last name "Falk" clearly distinguishable.

Ronald J. Falk, MD, FASN
President

cc: Health Resources and Services Administration
Vipra Ghimire
Jason P. Livingston
Organ Procurement and Transplantation Network
Rachel N. Shaffer