

ORGAN PROCUREMENT AND TRANSPLANTATION: FROM THE BASICS TO THE ISSUES

- To be paid by Medicare, Organ Procurement Organizations (OPOs) and transplant centers must be members of the United Network for Organ Sharing (UNOS), which manages the Organ Procurement and Transplantation Network (OPTN).
- Transplant centers and OPOs must comply with multiple oversight agencies and requirements, including OPTN policies and guidelines and the Medicare Conditions of Participation (CoPs).
- Medicare pays for organ procurement and transplants through various payment methodologies, including cost reimbursement.
- Because of the unique nature of these services, the government closely monitors this area, and organizations must be careful to avoid enforcement actions.
- Arrangements between transplant centers, OPOs, and physicians should comply with federal anti-kickback laws.

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