



Center for Clinical Standards and Quality

Admin Info: 25-10-Transplant

DATE: September 3, 2025

TO: State Survey Agency Directors

FROM: Director, Quality, Safety & Oversight Group (QSOG) and Survey & Operations Group (SOG)

SUBJECT: Prioritizing Transplant Program Reapproval Surveys Based on Performance

Memorandum Summary

- **The Centers for Medicare & Medicaid Services (CMS) is implementing a data-driven approach to prioritizing surveys of Medicare-approved transplant programs for reapproval. The prioritization system uses metrics derived from the [Scientific Registry of Transplant Recipients \(SRTR\)](#) Program Specific Reports.**
- **The data-driven process will continue prioritizing reapproval surveys of certain transplant programs as a Tier 2 priority, while shifting other standard reapproval surveys to a Tier 3 priority.**
- **On October 1, 2025, CMS will begin piloting this new prioritization method for transplant program reapproval surveys focusing on adult kidney transplant programs.**

Background:

CMS is committed to taking critical steps to ensure Medicare beneficiaries receive high-quality transplantation services. In keeping with that commitment, CMS is implementing a data-driven process to prioritize transplant program reapproval surveys and evaluate the quality of care experienced by transplant candidates and recipients.

The new process will rely on transplant data to prioritize survey activities for determining compliance with the Medicare Conditions of Participation for transplant programs. This process will use diverse metrics that are meaningful to transplant programs and impactful to transplant candidates and recipients. The diverse metrics, a combination of pre- and post-transplant measures, will form a composite score to comprehensively assess program processes, quality of care, and outcomes. The composite score will balance and combine four individual metrics into a single composite performance score for individual transplant programs. The metrics are transplant rate ratio, offer acceptance ratio, one-year patient survival, and one-year graft survival. In the future, other metrics may be added to the calculation of the composite score based on their

influence on transplant program quality and outcomes. CMS will use the composite score to prioritize reapproval surveys of transplant programs.

Discussion:

Ongoing evaluation is critical to ensuring that Medicare-approved transplant programs continue to meet Medicare health and safety requirements. An effective organ transplant system focuses on patient safety, increasing transplants, and reducing organ discards. The new prioritization process will use a meaningful, data-driven method comprised of a composite score to prioritize surveys that evaluate compliance with the Medicare Conditions of Participation for transplant programs. The individual measures are standardized by using a statistical methodology so their distributions follow a similar scale and they can be combined into a single composite score. Once the measures are combined into the composite score, the scores are used to prioritize transplant program reapproval surveys. This method uses a holistic set of measures that reflect both pre- and post-transplant outcomes and accurately depicts transplant program performance in which program activities influence the metrics.

Reprioritization of the Tier Status

On behalf of CMS, state survey agencies (SAs) perform transplant program survey activities based on a tiered prioritization system guided by the annual Mission and Priority Document (MPD). All transplant programs are required to receive a reapproval survey with a maximum 5-year interval between surveys. Currently, all transplant program reapproval surveys are set as a Tier 2 (higher) priority. In FY 2026, we plan to re-prioritize reapproval surveys, having SAs focus first on reapproval surveys of transplant programs that have lower performance based on their composite scores before the SAs move on to lower-tiered surveys. We understand that this shift requires states with two or more performance-based reapproval surveys to allocate additional resources to prioritize those surveys. Recognizing the burden this places on those states, we are allowing states that have two or more performance-based reapproval surveys to shift their standard transplant reapproval surveys to Tier 3. If a state has fewer than two performance-based reapproval surveys, we expect there to be no change in the tier prioritization for standard transplant reapproval surveys (they remain Tier 2 priority status).

This data-driven process will allow CMS to better target resources on those transplant program reapproval surveys and better enable SAs with greater numbers of transplant programs that meet the prioritization criteria to balance survey workloads. During the first year of the pilot, survey prioritization using the composite score will be limited to reapproval surveys of adult kidney transplant programs. We expect to prioritize surveys of approximately 20 programs nationwide in FY 2026. While transplant hospitals meeting those criteria during the pilot year may have other CMS-approved organ transplant programs, surveyors are expected to prioritize the standard reapproval survey of the kidney transplant program. If the transplant hospital has other organ transplant programs due for a reapproval survey, the SA may survey the other organ types within the same survey event. States should communicate to CMS Locations any concerns they have about meeting the Tier 2 requirements and their relationship to other survey priorities.

| REVISED PRIORITY TIER STRUCTURE Survey & Certification Activities For Transplant Programs | | |
|---|---|--|
| | TIER 2 | TIER 3 |
| TRANSPLANT | All Transplant Program Performance-Based Reapproval Surveys Standard Reapproval Surveys (5-year interval) —applicable to transplant programs in states with <u>fewer than two</u> transplant programs identified in Performance-Based Reapproval Surveys. Reapproval surveys are for all organ transplant types. | Initial certification —All others not listed under Tier 1. Standard Reapproval Surveys (5-year interval) — applicable to transplant programs in states with <u>two or more</u> transplant programs identified in Performance-Based Reapproval Surveys. Reapproval surveys are for all organ transplant types. |

*Tier 1: Initial certification for Provider/Supplier’s application to Medicare that exceeds 150 days with no deeming option or with a CMS-determined access to care issue (the provider is responsible for providing the information)

Contact:

For questions or concerns relating to this memorandum, please contact
QSOG_TransplantTeam@cms.hhs.gov.

Effective Date:

Immediately. Please communicate to all appropriate staff within 30 days. The Performance-Based Survey Prioritization process will begin on October 1, 2025.

/s/

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Resources to Improve Quality of Care:

*Check out CMS’ new **Quality in Focus** interactive video series. The series of 10–15 minute videos are tailored to provider types and aim to reduce the deficiencies most commonly cited during the CMS survey process, like infection control and accident prevention. Reducing these common deficiencies increases the quality of care for people with Medicare and Medicaid.*

Learn to:

- *Understand surveyor evaluation criteria*
- *Recognize deficiencies*
- *Incorporate solutions into your facility’s standards of care*

*See the [Quality, Safety, & Education Portal Training Catalog](#), and select **Quality in Focus***

Get guidance memos issued by the Quality, Safety and Oversight Group by going to [CMS.gov](https://www.cms.gov) page and entering your email to sign up. Check the box next to “CCSQ Policy, Administrative, and Safety Special Alert Memorandums” to be notified when we release a memo.