Complaints are often not made because people are unaware of how to start the complaint process, have no faith that filing a complaint will lead to any meaningful change (since no OPO has been successfully decertified), or because the OPO’s fault is less visible compared to a transplant center.

A patient’s family might complain to the OPO directly but not know to bring the complaint to CMS, and there is no external filing a complaint will lead to any meaningful change (since no OPO has been successfully decertified), or because the OPO’s fault is less visible compared to a transplant center.

The process is only as good as the regulatory context in which the complaint is being considered. The OPO conditions for coverage often lack specificity and can be open to interpretation.