



Advancing Transfusion and  
Cellular Therapies Worldwide



America's Blood  
Centers  
It's About Life.



American  
Red Cross

March 27, 2020

James Berger  
Designated Federal Officer  
Office of Infectious Disease and HIV/AIDS Policy  
U.S. Department of Health and Human Services  
200 Independence Avenue, SW  
Washington, D.C. 20201

**Re: RFI Response - Request for Public Comments on Section 209 of the Pandemic and All-Hazards Preparedness and Advancing Innovation Act**

Dear Mr. Berger:

AABB, America's Blood Centers (ABC) and the American Red Cross (ARC) are jointly submitting a response to the request for information (RFI) entitled, "Solicitation for Public Comments on Section 209 of the Pandemic and All-Hazards and Advancing Innovation Act", which was published in the Federal Register on March 23, 2020.

Our organizations are pleased that the U.S. Department of Health and Human Services (HHS) is soliciting feedback on recommendations related to maintaining an adequate national blood supply. However, given the significant disruption facing the United States due to the coronavirus disease (COVID-19) pandemic, we request that HHS extend the comment period to at least 90-days from publication to permit adequate time for the public to respond to the questions posed in the request and provide recommendations.

Many stakeholders, including our organizations and others in the blood community, who would weigh in on this RFI, are currently experiencing challenges related to ensuring the adequacy of the blood supply due to the ongoing public health emergency. Additionally, the COVID-19 pandemic has highlighted the importance of the continuous recruitment of blood donors as well as other measures to promote safety and availability. We believe that information collected as part of our efforts to ensure the continued safety and availability of the nation's blood supply during this crisis will be critical to HHS and the report to Congress. Additional time is needed to develop an appropriate response based on the lessons we are currently learning.

Thank you for the opportunity to offer these comments on the RFI. We look forward to continuing to work with the U.S. Department of Health and Human Services on recommendations related to maintaining a safe and adequate national blood supply. If you have any questions or need additional information, please contact Leah Stone ([lmstone@aabb.org](mailto:lmstone@aabb.org) or at 301-215-6554), Diane Calmus ([dcalmus@americasblood.org](mailto:dcalmus@americasblood.org) or at 202-654-2988), and Julie Manes ([julie.manes@redcross.org](mailto:julie.manes@redcross.org) or at 202-417-5147).

Sincerely,

Debra BenAvram  
Chief Executive Officer  
AABB

Kate Fry  
Chief Executive Officer  
America's Blood Centers

J. Chris Hrouda  
President, Biomedical Services  
American Red Cross