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American
Red Cross

May 13, 2020

Ms. Seema Verma, Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Mail Stop C4-26-05
7500 Security Boulevard
Baltimore, MD 21244-1850

Re: Re-opening Facilities to Provide Non-emergent Non-COVID-19 Healthcare

Dear Administrator Verma:

AABB, America's Blood Centers and the American Red Cross - which collectively represent the nation's blood collection establishments, transfusion services, and transfusion medicine professionals - appreciate the Department of Health and Human Services' ongoing support for the blood community and commend the Centers for Medicare and Medicaid Services (CMS) for developing recommendations for health care facilities to consider as they restart providing non-emergent care to patients with non-COVID-19 needs. We request that CMS update these recommendations to recognize the need for hospitals to work with their blood supplier to ensure their blood inventory is sufficient to support the ever-changing requirements for blood, especially as resumption of elective surgeries and non-emergent care increase blood utilization.

Maintaining a safe and adequate blood supply continues to be a critical public health objective. As a result of the COVID-19 pandemic, hospitals' blood utilization has significantly declined. Blood suppliers have altered their operations and collections have decreased due to the reduced utilization, social distancing, modified staffing structures and cancelled blood drives.

The blood supply chain remains fragile, as blood is a short-dated product collected from individual volunteer donors by community based-blood centers. Blood has a shelf life of up to 42 days for red blood cells and only five days for platelets, thereby requiring constant and regular collection from healthy individuals to sustain the nation's blood supply. Thus, while we recognize there is demand for elective and non-emergent healthcare services, it is essential that hospitals use information about the blood supply to inform their approach to resuming these activities.

We agree and understand that the CMS recommendations are part of a planned, phased approach to prevent overwhelming health care systems. We strongly believe that coordination between hospitals and blood centers is critical to this effort. CMS should encourage hospitals to work with their blood suppliers, blood banks and transfusion services to continually assess their blood inventory to ensure that it supports their changing utilization needs.

If you have any questions, please contact Leah Stone (301-215-6554, lmstone@aabb.org), Diane Calmus (202-654-2988, dcalmus@americasblood.org) or Julie Manes (202-417-5147, julie.manes@redcross.org).

Sincerely,

Debra BenAvram
Chief Executive Officer
AABB

Kate Fry
Chief Executive Officer
America's Blood Centers

J. Chris Hrouda
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