

Government's Role in Assuring the Safety and Adequacy of the National Blood Supply:
Supporting Community-based Blood Centers

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Availability
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The US Blood Collection System

- **♦ 47% ABC:** Locally controlled not-for-profit, individually FDA licensed collection centers
- **♦ 45% ARC:** Nationally controlled not-for-profit organization with a single FDA license
- **♦** 6% Hospital based donor centers: generally registered, most not FDA licensed
- **4** 1% Armed Forces Blood Program
- **♦ 1% Other**

The US Blood Collection System

- **♦** ARC and the community-based ABC centers were formed to meet local needs
 - **♦** About 7% of RBCs from ABC centers with effective collection strategies are shared with other centers
- ★ Hospital-based programs were established to meet hospital's individual needs
 - **♠** Most are not self-sufficient
 - **♦ Most cannot export across state lines**
- & The military meets most of its own "routine" needs

Where Have all the Donors Gone?

- Surrogate testing for NANB Hepatitis
- **♦** Deferrals for malaria, medications
- **♦ vCJD Deferrals**
- **♦** Implementation of cGMP "When in doubt, defer"
- **♦ HCV/HIV testing**
- WNV Deferrals
- Closure of access to military sites during conflict

Blood Shortages Are Increasing

- **♦ US** blood center supply
 - **♦** Before September 11, 3-5 days
 - **♦** Today, 2-3 Days
- **♦ FDA deferrals are increasing**
 - **♣** For example, vCJD affected 8-10% of willing, frequent donors; continuously additive
- Blood demand increases as US population ages
- **♦ Sub-optimal utilization patterns**

Meeting Today's Challenges

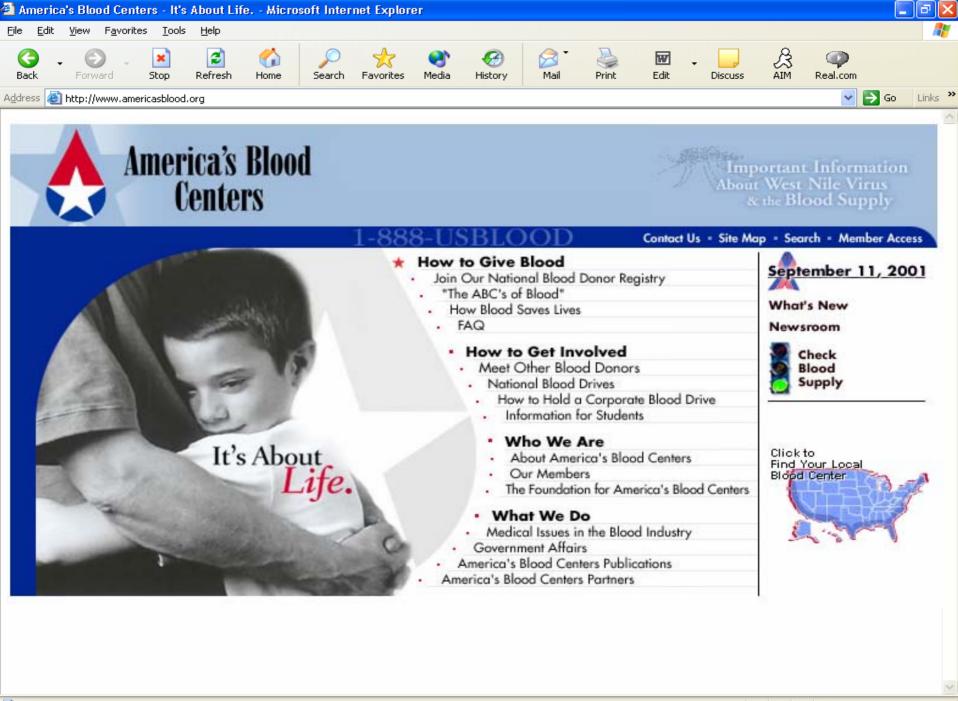
- **♦** Why don't most hospitals feel the effect?
 - ♦ We work harder to assure supply
 - **♣** Blood center inventories have been shifted to hospitals
- **♣** Successful collections depend upon investment of more resources (\$\$) in:
 - Recruitment
 - ♣ Personnel, mobile and fixed collection units, paid and pro bono advertising

ABC Donor Recruitment Initiatives

- & My Blood, Your Blood
- **♦ MDI (Member Donor Initiative)**
- **♦** Ad Council campaign (with ARC & AABB)
- **♠ National Blood Drives**
- **&** E-Donation

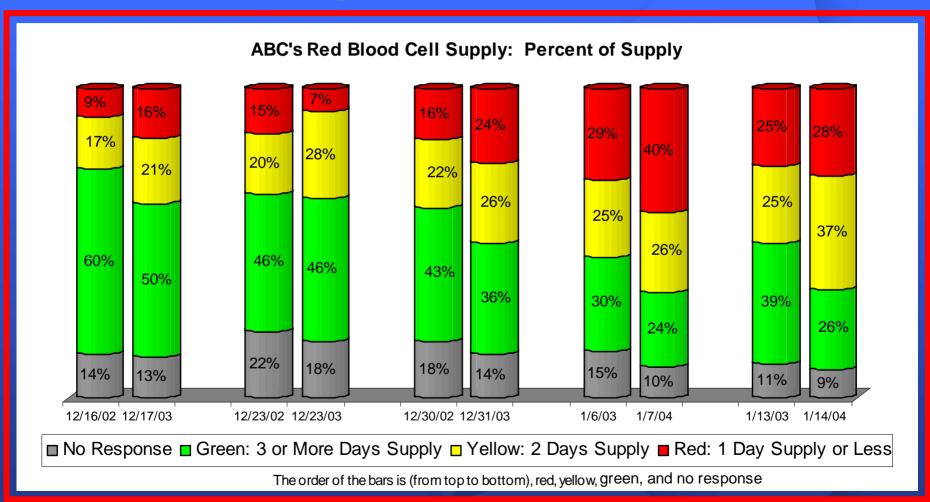
Initiatives Focused on the Blood Supply

- **♦ ABC Stoplight, 1st national public realtime supply monitor**
- **♦** Resource Sharing
 - **♦ BCA, direct center contracts, AABB National Blood Exchange supplemented by:**
 - **♦ ABC efforts to support shortage areas (e.g.: New York, Memphis, Richmond)**
 - **♣ Internet system for members to post surpluses** and order blood
 - **♦ "Blast e-mail" to all 76 members about emergency blood needs**





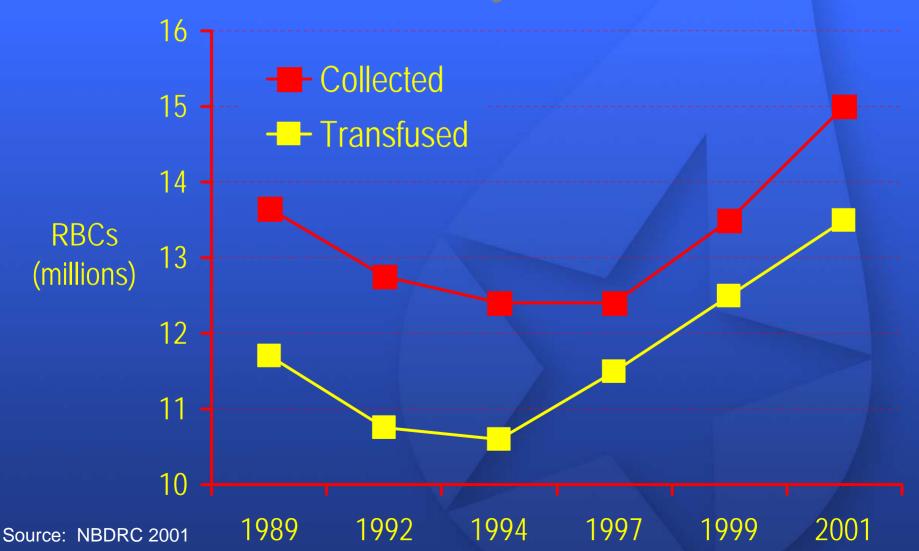
Despite Historic Success, Supply is not Keeping Pace with Demand



Some Centers Have Been Unable to Offset Increased Demand & New Deferrals

- **♦** Large number of tertiary care centers
 - A Increased use, disadvantageous case mix
- **♠** Located in areas with
 - Complex economic and demographics
 - Competition for altruism
 - & Rural vs. urban sense of community & priorities
- **♦ Disproportionate local impacts of new restrictions**
 - **♦ NYBC and vCJD: 25% immediate loss**
 - **♦** Centers dependent on military/former military donors

Can we Meet Increased Demand in the Current System?



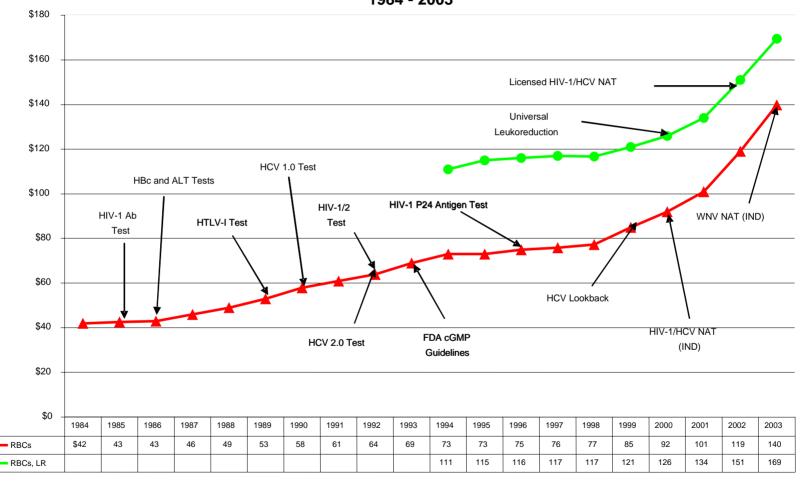
Why Don't We Charge More?

- ♠ Reimbursement by CMS is slow to reflect mandated increases in cost for safety
 - **♣** Last year (despite WNV NAT and vCJD related expenses and no increases for leukoreduction or HCV/HIC NAT), CMS proposed cutting reimbursement for blood
 - **♣** Regulatory costs mandated by FDA are not considered by CMS
- **♦ Non-CMS payers use CMS as benchmark**
- **♣** Enormous pressure from hospitals to restrain increases in component cost result

The Cost of Safety

- Blood collection organizations have absorbed multiple additional costs associated with producing a safer product.
 - Unrecovered costs of safety measures reduce operating margins. Money spent for compliance is shifted from:
 - **♦** Capital investment
 - Innovative donor recruitment
- ★ The future depends on this committee tying reimbursement to safety and availability, as its name implies
 - **♣** ACBSA must maintain pressure on CMS and the Secretary to quickly and accurately determine the cost of blood products and adjust reimbursement and we will reinvest in infra-structure and recruitment

America's Blood Centers Safety Measures and Average Red Blood Cell Service Fees 1984 - 2003



Despite Challenges, the System Works

- ★ More than 4 million lives saved each year by blood transfusion
- ♠ On occasion, elective surgeries have been delayed to assure a local emergency supply (Triage)
- **♦** Local and regional shortages occur, but there has been no NATIONAL crisis (e.g., deaths or widespread organ wastage)

Does Government Have a Role in a Country without a National Blood Program?

Yes, in:

- **♠** Promoting the will to donate as a civic responsibility
- **♦** Insuring adequate reimbursement and timely adjustments
- **♣** Funding initiatives necessary for the appropriate regulation of a safe and adequate blood supply, e.g.,
 - **♦ Validate proposed donor screening questions before** they appear in Regulations or Guidance Documents
 - **♦** Evaluate changes in eligibility criteria before implementation and work with private sector on strategies to offset donor losses

Government Role

- Rapidly and openly assessing new threats to blood safety and risks to donors or patients
- Supporting research on the appropriate use of blood components
 - Any decline in the blood use is an increase available supply
- **♦** Changing rules that prohibit CBER from talking to private sector before promulgating regulations or guidance (a role for "negotiated rulemaking?")
 - **♦ Negotiations may uncover ways to improve safety with little disruption in process or supply**
 - **♦** Could have improved outcomes in recent CBER actions regarding vCJD, SARS, Smallpox vaccine, WPM

Government Role in Disaster Response

- ★ September 11 and the weeks following are a clear demonstration that adequacy is not an issue in response to disaster
- **♦ September 11 and Top Off exercises have demonstrated the need for...**
 - ★ ...logistical and transportation support to move blood, testing reagents and supplies to the appropriate location in the event of a natural or man made disaster
 - ...a system available to rapidly collect and disseminate information in a crisis

Summary

- ♦ The current system has saved tens of millions of lives in over 60 years of blood banking
- **♦** Government should...
 - Protect the safety of donors and recipients
 - Promote a culture of donation as a civic responsibility
 - Assure that reimbursement reflects the cost of safety
 - A Promote innovation and research:
 - **♦** To rapidly and openly assess the risks of new threats and impact of safety initiatives
 - **♦** To promote appropriate use of blood
 - **♦** Leave the management of collection, processing and distribution to the experts



Thank you