



March 24, 2022

The Honorable Richard Pan
Chair, Senate Health Committee
1021 O St. Room 3310
Sacramento, CA 95814

RE: SB 1475 (Glazer) – Blood banks: collection - SUPPORT

The Association for the Advancement of Blood and Biotherapies (AABB, formerly known as the “American Association of Blood Banks”) is pleased to submit this letter in support of SB 1475, which authorizes blood to be collected at a blood bank with the registered nurse placed in charge either physically present or available via telehealth.

AABB is a not-for-profit association representing individuals and institutions involved in the fields of transfusion medicine and biotherapies. The association is committed to improving health through developing and delivering standards, accreditation and educational programs that focus on optimizing patient and donor care and safety. AABB individual members include physicians, nurses, scientists, researchers, administrators, medical technologists, and other health care providers.

Blood centers in California supply lifesaving blood and blood components, and are highly regulated by the Food and Drug Administration (FDA), AABB and the state. *AABB Standards for Blood Banks and Transfusion Services (AABB Standards)*, which are recognized by California state law and are used throughout the world, include standards related to personnel qualifications, training, and competencies. Neither FDA nor the *AABB Standards* require the physical presence of a registered nurse at all sites when blood is donated.

In contrast, California is the only state that mandates that a registered nurse be physically present at all sites whenever blood is donated. Despite this requirement, California’s hemovigilance data is no different from other states that do not require registered nurses to be present when blood is donated. Blood collectors manage donor reactions according to procedures that have been approved by medical directors, which are handled the same regardless of whether a registered nurse or a non-licensed donor care staff member is assisting with a reaction. AABB is committed to the health and safety of donors and patients, supports the use of telehealth by blood collectors and believes that telehealth is a viable option for responding to adverse events that may occur during the donation process.

Telehealth is being used more frequently in a variety of settings and has been shown to be effective and efficient. Similar to other health care providers, blood collectors continue to experience significant workforce shortages, including but not limited to registered nurses. In addition, blood collectors are facing considerable economic pressures and it is extremely difficult to compete for registered nurses, who are offered significantly higher salaries to work in acute

care settings. State policy should encourage the limited number of registered nurses to work in direct patient care; blood donors are healthy and are not patients.

During the COVID-19 pandemic emergency, California blood collectors have been able to utilize a remote telehealth option for meeting the State's staffing requirements. Over the past two years, blood collectors in California have demonstrated that blood can safely be collected with staff having access to a registered nurse via telehealth should consultation be needed. Without this option, due to the severe shortage of registered nurses and their need to be utilized in acute patient care, thousands of units of blood would not have been collected in California. If the State does not act, the telehealth option will not be available when the emergency is declared over.

For these reasons, we fully support SB 1475, which would permanently authorize blood to be collected at a blood bank when the registered nurse placed in charge is either physically present or available via telehealth.

If you have any questions, please contact Leah Stone, Vice President, Public Policy and Advocacy at lmstone@aabb.org or 301-215-6554.

Sincerely,

Debra BenAvram
Chief Executive Officer
AABB