



June 17, 2019

Ms. Seema Verma  
Administrator  
Centers for Medicare & Medicaid Services  
Department of Health and Human Services  
Attention: CMS-1714-P  
P.O. Box 80107500  
Baltimore, MD 21244-1850

**Re: Medicare Program; FY 2020 Hospice Wage Index and Payment Rate Update and Hospice Quality Reporting Requirements (CMS-1714-P)**

Dear Administrator Verma:

AABB (formerly known as the American Association of Blood Banks), America's Blood Centers and the American Red Cross appreciate the opportunity to submit comments in response to the proposed rule announcing the hospice wage index and payment rate update and hospice quality reporting requirements for fiscal year 2020 (Proposed Rule), which was published in the Federal Register on April 25, 2019. Collectively, our organizations represent the nation's blood collection establishments, transfusion services, and transfusion medicine professionals.

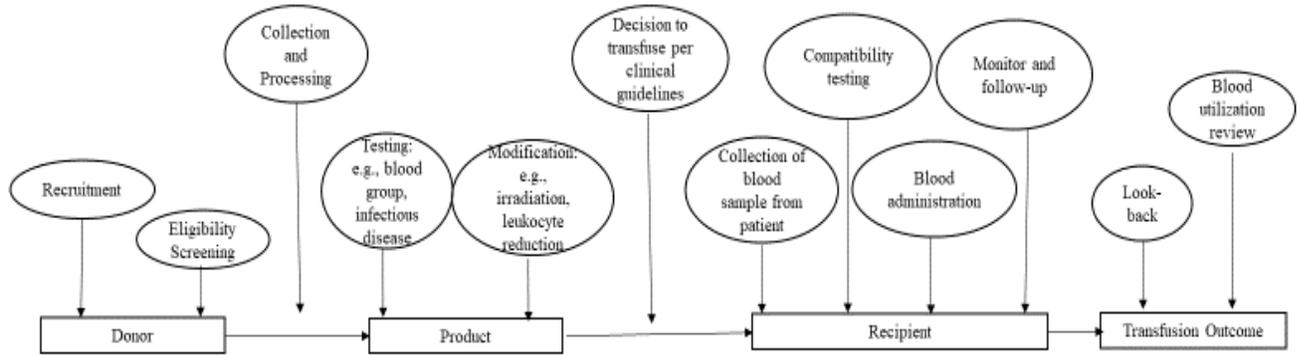
We applaud CMS for recognizing the importance of ensuring that Medicare beneficiaries receiving care under the hospice benefit have access to palliative blood transfusions. Palliative blood transfusions relieve debilitating symptoms that negatively impact the quality of life. CMS' explicit recognition that the hospice benefit covers palliative blood transfusions is an important step in ensuring that patients have access to this critical therapy.

In addition, we believe that adequate reimbursement is an essential element of ensuring that beneficiaries receiving care under the hospice benefit have access to covered services, including palliative blood transfusions. CMS specifies that "the per diem payment amounts paid to hospices account for such services and hospices are required to cover those items, services, and drugs for the palliation and management of the terminal illness and related conditions," including palliative blood transfusions.

As illustrated in Figure 1, blood transfusion is a highly protocolized, complex, resource-intensive therapy. Specialized physicians, medical technologists, nurses and other support staff provide essential expertise throughout the transfusion process. The collection, processing, testing, storage, distribution and administration of blood components involves critical medical equipment and supplies. In addition, the transfusion process includes multiple safety measures and monitoring to avoid adverse events. AABB accredits blood collection establishments, transfusion services and out-of-hospital transfusion administration services to promote patient

safety and quality, and to ensure compliance with AABB’s standards as well as federal regulations and guidances.

**Figure 1: Transfusion Process**



We question whether current payment rates for hospice providers are adequate to cover the costs of palliative blood transfusions. Absent sufficient reimbursement, we are concerned that patients receiving care under the hospice benefit will not have access to palliative blood transfusions.

If you have any questions or need additional information, please contact Leah Stone (301-215-6554 or [lmstone@aabb.org](mailto:lmstone@aabb.org)), Kate Fry (202-654-2911, [kfry@americasblood.org](mailto:kfry@americasblood.org)) or Liz Marcus (202-303-7980, [liz.marcus@redcross.org](mailto:liz.marcus@redcross.org)).

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