

Position Statement: Policy Proposals Related to Vaccinations and Blood Donation

The Association for the Advancement of Blood and Biotherapies (AABB) strongly opposes policy proposals that would establish requirements related to testing or labeling blood for evidence of messenger RNA (mRNA) vaccines or the COVID-19 vaccine. The Association also opposes policy proposals that would mandate donor disclosure and informed consent specifically tied to mRNA vaccines or the COVID-19 vaccine. These flawed proposals are unnecessary, overly burdensome, and can jeopardize patients' access to lifesaving blood transfusions.

Blood transfusions are lifesaving medical procedures, commonly used to treat patients with conditions such as cancer, anemia, and sickle cell disease, as well as patients experiencing surgeries, childbirth, or trauma. The health care system relies on the continuous availability of blood donors in communities throughout the nation, as well as blood collectors being able to furnish hospitals with the blood needed to save lives. Proposed policies that would require testing or labeling blood for evidence of mRNA vaccines or COVID-19 vaccines would hinder donation efforts and may lead to adverse health consequences. Similarly, proposed policies that contain donor disclosure and informed consent requirements related to these vaccines would create unnecessary barriers to blood donation and negatively impact patient care.

- Lack of validated testing methods: There is no validated method or test to determine whether a donor received an mRNA vaccine or a COVID-19 vaccine. Therefore, blood collectors would not be able to comply with these requirements and may stop furnishing blood to hospitals impacted by such a policy.
- **Cross-jurisdictional limitations:** Blood is routinely moved across state lines to ensure a steady supply. This activity becomes especially necessary during critical events, such as inclement weather, when collections in a region may be halted. Hospitals may face challenges receiving blood from blood collectors operating in different jurisdictions since blood cannot be tested or labeled for evidence of an mRNA vaccine or a COVID-19 vaccine. This could significantly reduce patients' access to blood collected in other states, which will exacerbate shortages and hinder patient care.
- Lack of donor vaccination status information: Hospitals do not have information on a blood donor's vaccination status and cannot provide patients with such information about units of blood.
- Existing informed consent processes: Every patient has the option to accept or decline a blood transfusion as part of informed consent policies, processes, and procedures. Since providers do not have information about a blood donor's vaccination status, it is impossible to include such information in the informed consent process.
- Safety of the blood supply: Blood transfusions in the United States are among the safest in the world due to rigorous screening, testing, and monitoring procedures implemented by blood collectors and transfusion services. All donors undergo an extensive screening

process to ensure that they are healthy and do not have infectious diseases that could be transmitted through blood transfusions. Additionally, blood donations are tested for infectious diseases. COVID-19 is not transmissible by blood, and mRNA vaccines are not transmissible by blood. None of the COVID-19 vaccines that are approved in the United States present known risks to the safety of the blood supply or to patients requiring blood transfusions.

For several years, the nation has navigated challenges with blood availability and the past few years have illustrated that a limited blood supply can result in delayed care, cancelled procedures, and sub-optimal health care. New, unnecessary restrictions related to blood collection have the potential to disrupt the blood supply and will negatively impact patients' access to care. For example, these policies could result in providers needing to delay critical cancer treatments, send trauma patients increased distances to receive needed blood, or limit locations that offer services that often accompany blood transfusions, such as obstetrics, neonatology, hematology, oncology, transplants, surgery, and critical care.

We urge policymakers to avoid establishing policies that could result in significant and lifethreatening consequences for patients who rely on blood transfusions. Policies that establish testing, labeling, disclosure, or informed consent requirements related to an mRNA vaccine or the COVID-19 vaccines will reduce patients' access to safe blood components and quality healthcare. Rather, we encourage policymakers to support patients who require life-saving blood transfusions by encouraging every eligible American to <u>schedule a donation appointment today</u>.

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AABB is a not-for-profit association representing institutions and highly trained individuals involved in transfusion medicine and biotherapies. The association is committed to "improving lives by making transfusion medicine and biotherapies safe, available and effective worldwide." AABB works toward this vision by developing and delivering standards, accreditation, and educational programs that focus on optimizing patient and donor care and safety. AABB individual membership includes physicians, nurses, scientists, researchers, administrators, medical technologists, and other health care providers dedicated to blood safety.