

Supporting Statement for Request for Clearance:

NATIONAL BLOOD COLLECTION AND UTILIZATION SURVEY (NBCUS)

OMB No. (Extension of 0990-0313)

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SUPPORTING STATEMENT

NATIONAL BLOOD COLLECTION AND UTILIZATION SURVEY (NBCUS)

This request is for OMB clearance for an extension of the National Blood Collection and Utilization Survey (NBCUS, OMB 0990-0313). The NBCUS is a biennial survey of the blood collection and utilization community to produce reliable and accurate estimates of national and regional collections, utilization and safety of all blood products. The 2019 NBCUS is funded by Department of Health and Human Services (DHHS/OASH) and performed by the Centers for Disease Control and Prevention (CDC). In previous years, a similar survey was performed under the auspices of the National Blood Data Resource Center (NBDRC), a private subsidiary of AABB (formerly known as the American Association of Blood Banks), with private funding. In 2005, 2007, 2009, and 2011 the survey was funded by HHS/OS/OASH and performed under contract by AABB. The CDC has since performed the 2013, 2015, and 2017 iterations of the NBCUS. The 2019 NBCUS is not significantly different from the previous 2017 version of the survey and is being submitted to the OMB as a PRA renewal due to expiration (OMB 0990-0313).

The survey questionnaire will be mailed to approximately 3,000 institutions that include hospitals and blood collection facilities selected from the American Hospital Association (AHA) annual survey database and AABB member list of blood collection facilities. The survey includes a core of standard questions on blood collection, processing, and utilization practices to allow for comparison with data from previous surveys. Additionally, questions to specifically address emerging and developing issues and technologies in blood collection and utilization are included. Questions on

transfusion transmitted infections, transfusion associated circulatory overload, acute hemolysis, delayed hemolysis, and severe allergic reactions are included in the survey.

A. Justification

A1. Circumstances Making the Collection of Information Necessary

Under the authority of Section 301 of the Public Health Service Act (42 U.S.C.241), as identified in the 1997 HHS Blood Action Plan, and repeatedly in the Advisory Committee on Blood Safety and Availability's (ACBSA) recommendations to the Secretary, there is a need to provide national policy makers with current supply and demand data. The ACBSA was established by HHS in 1997 to provide policy advice to the Secretary and the Assistant Secretary for Health and was amended in 2012 to include tissues, becoming the Advisory Committee on Blood and Tissue Safety and Availability (ACBTSA). The advice of the committee is partly dependent on the analysis of relevant blood collection and utilization data which is also widely distributed to and used by the transfusion medicine community. The Office of the Assistant Secretary for Health (OASH) is responsible for conducting a biennial cross-sectional national blood products survey. Previous private and government financed versions of the NBCUS have successfully surveyed greater than 90% of the U.S. blood collection and processing facilities and more than 2,300 hospital-based transfusion blood banks in the United States.

As stated in the evolving National Strategic Plan for Blood, the federal government is charged with developing a blood safety public health monitoring system. The identification and collection of biovigilance denominator data in the 2019 NBCUS

will help the government by providing specific data to assist in the implementation of this safety monitoring system.

A2. Purpose and Use of Information Collection

The objective of the NBCUS is to produce reliable and accurate estimates of national and regional collections, utilization, and safety of blood products – red blood cells, fresh frozen plasma, and platelets. This survey will significantly improve the federal government’s capacity to understand the dynamics of blood supply, safety and availability, and to provide a quantitative basis for assessing strategic and regulatory agendas. An important purpose of the 2019 survey is to help the federal government continue to monitor trends in blood availability, which is critical to ensure an adequate supply of safe blood in the United States. In addition to use by the federal government, data collected in this survey will be of practical use to the blood banking and hospital transfusion services communities in the private sector. In previous years the comprehensive survey report published on blood collection and transfusion related activities has been widely used by the transfusion medicine community. Broad dissemination of the survey findings through publication of this survey report and scientific papers in peer reviewed journals has significantly benefited not only HHS, but the transfusion medicine community at large by furthering community discussion of key findings. Data from the 1997 and 1999 surveys have been used in testimony before congress. Data from subsequent surveys have informed policy across HHS operating and staff divisions.

Each question in the proposed survey relates to the analysis objectives detailed in Section A-16 and lists the questions by survey domains and provides justification. The general categories of information to be collected are:

- General information
- Blood collection, processing and testing
- Blood transfusion
- Special procedures and product disposition

A3. Use of Improved Information Technology and Burden Reduction

This survey is deployed as an electronic questionnaire and efforts made to minimize respondent burden are as follows:

- The questionnaire is divided into color coded sections that clearly identify sections that blood banks/ hospitals/cord blood banks need to complete or skip.
- Appropriate sections of the survey instrument will be emailed to each institution.
- The questionnaire contains easy to read instructions and skip patterns to avoid having respondents answer unnecessary questions.
- The questionnaire contains a glossary of definitions to assist the respondent.

To ensure that the most relevant supply and utilization issues are addressed fully, critical questions from the full survey instrument will be available in the form of a supplemental web survey on the CDC website. Institutions either unwilling or unable to participate in the full survey will be asked to respond to this short list of questions.

A4. Efforts to Identify Duplication and Use of Similar Information

Reliable data on blood collection and utilization on a national scale are not available from any other source. While segments of the blood collection industry collect some information, it is often proprietary and not available to the government or the public at large. The 2019 survey will contain the core questions asked on previous national surveys (NBCUS) to allow for comparison of data. AABB previously consulted with its various expert committees, consisting of members who are leading researchers in the field, to identify and develop novel questions that are of interest to the transfusion medicine community.

A5. Impact on Small Businesses or Other Small Entities

Very few of the survey respondents are small hospitals. Hospitals performing less than 100 surgeries are excluded from the sample because they contribute little to either collections or blood product utilization. To help all institutions complete the survey, a telephone helpline and direct email account be provided to answer questions related to the survey.

A6. Consequences of Collecting Information Less Frequently

The NBCUS is administered biennially. The rapidly changing environment in blood supply and demand makes it important to have regular, periodic data describing the state of US blood collections and transfusions, for understanding the dynamics of blood safety and availability. These data have become even more crucial with the need to help insure patient safety by monitoring and identifying errors in transfusion medicine and related therapies.

A7. Special Circumstances Relating to Guidelines of 5CFR 1320.5

The proposed data collection is consistent with 5CFR 1320.5. There are no special circumstances applicable to the survey.

A8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

As required by 5 CFR 1320.8(d), the 60-day Federal Register notice was published on 08/22/2018 (volume # 83 FR 42518; page # 42518-42519) with one comment received to this notice: “...*the estimate of 1 hour of burden to complete the survey is wholly unrealistic, because the numbers requested would take least 5 hours.*” In response to this comment, the NBCUS staff re-calculated previous respondents’ average burden and discovered an avg. of 4 hours per biennial survey. This is in good correlation to the commenter’s claim of 5 hours, based on a total participant number of 2,940 facilities. The numbers in the burden tables below reflect this biennial 4-hour burden. There have been several meetings outside of DHHS to conceptualize and design sections of this survey. Various AABB expert committees such as the Transfusion Transmittable Diseases Committee, the Intra-organizational Task Force on Biovigilance: Working Group and the Coding and Reimbursement Committee were consulted in the development of the questionnaire. In addition, experts from the Centers for Medicare & Medicaid Services (CMS), the National Institutes of Health (NIH), the Food and Drug Administration (FDA), the Centers for Disease Control (CDC) and the Health Resources

and Services Administration (HRSA) were consulted on relevant sections of the questionnaire.

A9. Explanation of Any Payment or Gifts to Respondents

Respondents will not receive any gifts or payments.

A10. Assurance of Confidentiality Provided to Respondents

The Privacy Act does not apply to the proposed data collection since respondents are not human subjects, but institutions; and no patient/donor identifiers are collected.

A11. Justification of Sensitive Questions

Information on issues of a sensitive nature involving persons is not being sought. Infectious disease testing results are reported in aggregate only.

A12. Estimates of Annualized Burden Hours and Cost

The burden for the NBCUS survey is summarized in the table below. Each institution that is asked to complete the survey questionnaire is considered to be a respondent. The respondents to this survey are hospitals, blood collection centers and cord blood banks. The number of eligible respondents is 2,940. It is estimated that each respondent will spend about 240 minutes (4 burden hours total; or 2 burden hour/year) completing the questionnaire. Averaged over a period of three years when this OMB clearance will expire, each respondent will spend 80 minutes (1.33 burden hours)

annually to complete this survey. The hourly burden estimates are based on previous years' experience administering the survey.

Estimate Annualized Burden Table

Type of Respondent	No. of Respondents	No. Responses per Respondent	Average Burden per Response (in hours)	Total Burden Hours
Hospital Blood Banks	2850	1	2	5700
Blood Collection Centers	70	1	2	140
Total	2920			5840

Burden Cost

The average annualized response burden cost to respondents is estimated to be \$204,400 based on an hourly wage of \$35 per hour. The hourly wage estimate is based on the Bureau of Labor Statistics' National Compensation Survey mean hourly wage data for health related occupations in 2018.

Type of respondents	Total annual response burden hours	Hourly wage rate	Respondent cost
Hospitals, blood collection centers, cord blood banks	5,840	\$35.00	\$204,400

A13. Estimates of Other Total Annual Cost Burden to Respondents and Record keepers

There is no other capital or start up costs, and no maintenance or service cost components to report.

A14. Annualized Cost to the Federal Government

All survey operations including survey development, data collection, analysis, and preparation of the final report are contracted to the CDC by OASH. The total cost of this fixed price Interagency Agreement (IAA) is \$242,500 annually.

A15. Explanation for Program Changes or Adjustments

This collection is being submitted for OMB approval on an Extension on a previously approved collection (after three such 3-year approval periods); only very slight changes were made to some of the survey questions to facilitate usability and all other aspects of the program remain the same. There was an increase of 3040 to the previous total burden hour 2800, due to an adjustment; as a result, 5840 total burden hour. It is important to note each facility takes on average 4 hours to complete the survey. This is a change from 3 hours. With the NBCUS occurring biennially (once every two years), this equates to a burden of 1.33/yr on average, or effectively 2 hours per participating facility per year.

A16. Plans for Tabulation and Publication and Project Time Schedule

The time table for key activities for the 2019 survey is as follows:

Table A 16: Timeline	
2/10/2019	Receive OMB clearance
1/30/2020	Begin data collection for 2019 survey (collect CY 2019 data)
4/15/2020	End data collection
4/30/2020	close out
5/30/2020	End data processing and create dataset
6/01/2020	Begin data analysis
9/01/2020	Publish final comprehensive report

Statistical tabulations of results for each question will be presented. These will be broken down by institution type, services provided, USPHS region, etc. Selected examples of types of analyses proposed include:

- Analyses of trends in the U.S. blood supply
- Total supply of blood collected in the U.S. broken down by type (Whole blood, Allogeneic, Whole blood autologous, WB directed, RBC apheresis, platelets, plasma etc)
- Total transfusions in the U.S. broken down by type (Whole blood, RBC, platelets, Non-RBC components transfused etc)
- National estimates of all whole blood and blood component units outdated by blood centers and hospitals
- Component modifications – Irradiation, leukocyte reduction by blood centers and hospitals
- Number of repeat reactive and confirmed positive first time and repeat allogeneic donors by infectious disease marker type
- Rates of confirmed positives and false positives by bacterial testing methods
- Number of adverse events (TRALI, TACO, Hemolysis, Allergic reactions etc)

After final validation of results a comprehensive report of findings from the survey will be published. The 2005, 2007, 2009, and 2011 Nationwide Blood Collection and Utilization reports are available at www.hhs.gov/ash/bloodsafety. The 2013, 2015 NBCUS data were published by Wiley and Sons in the journal *Transfusion*. The 2017 NBCUS is in final-production and pending publication in the journal *Transfusion*.

A17. Reason(s) Display of OMB Expiration Date is Inappropriate

Expiration date display exemption is not requested. The OMB clearance number and expiration date will be displayed on the upper right hand corner of the survey.

A18. Exceptions to Certification of Paperwork Reduction Act Submissions

The data encompassed by this survey will fully comply with all guidelines of 5 CFR 1320.9 and no exception is requested to certification for Paperwork Reduction Act Submission.