Supporting Statement A

2021 National Blood Collection and Utilization Survey OMB Control Number 0990-0313 - Revision

A. Justification

1. Circumstances Making the Collection of Information Necessary

This request is for OMB approval of a revised information collection request, the 2023 National Blood Collection and Utilization Survey (NBCUS), OMB No. 0990-0313. For the 2023 NBCUS, minor changes are made to core questions to facilitate usability, and two supplemental sections (which were added to capture information on the impact of the COVID-19 pandemic on the blood supply) have been removed. As stated in the Statement accompanying the 2021 NBCUS, we are not planning to continue the COVID-19 supplemental sections in subsequent surveys.

The Office of the Assistant Secretary for Health (OASH) within HHS is responsible for conducting a biennial cross-sectional national blood products survey. In addition, the Advisory Committee on Blood and Tissue Safety and Availability (ACBTSA) identified a need to provide national policy makers with current blood supply and demand data. The ACBTSA was established to provide policy advice to the Secretary and the Assistant Secretary for Health. The advice of the ACBTSA 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 and blood banking community. This data collection is authorized by Section 301 of the Public Health Service Act (42 U.S.C. 241) (Attachment A).

The NBCUS is an HHS/OASH funded project conducted biennially. Since 2013, in close collaboration with OASH, the NBCUS has been performed by the Centers for Disease Control and Prevention (CDC), which has the requisite technical and scientific resources to conduct the survey. The response rates for the 2021 NBCUS were 92.5% (49/53) for community-based blood collection facilities, 74.7% (92/83) for hospital-based blood collection facilities, and 76.3% (2102/2754) for transfusing hospitals. Based on the previous iterations of the NBCUS, we expect an overall response rate of almost 75% across all types of facilities.

2. 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 (RBCs), fresh frozen plasma, and platelets. This survey will significantly improve the federal government's capacity to understand the dynamics of blood supply and demand, and to provide a quantitative basis for assessing strategic and regulatory agendas. An important purpose of the 2023 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 to advance quality standards and procedures. Broad dissemination of the survey findings through publication of reports (2005-2011 surveys) and open access scientific papers in peer review journals (2013-2021 surveys) has significantly benefited not only HHS, but the transfusion medicine community at large by furthering community discussion of key findings. Data from 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. The general categories of information to be collected are:

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

3. <u>Use of Improved Information Technology and Burden Reduction</u>

The person completing the electronic survey will be given a unique login and password. Efforts to minimize respondent burden are as follows:

- The survey is divided into two sections (blood collection and blood transfusion) for respondents to complete or skip.
- The survey contains easy to read instructions and skip patterns to avoid having respondents answer unnecessary questions.
- The survey contains a glossary of definitions to assist the respondent.

- A Survey Helpline email address will be provided. The helpline will field inquiries related
 to the survey and will be available 24 hours a day to answer questions related to the
 survey.
- For institutions that have not responded, an abbreviated version of the survey containing critical items will be distributed. The survey will be made available both electronically and in paper form.

4. Efforts to Identify Duplication and Use of Similar Information

The NBCUS has been conducted by HHS/OASH since 2005, with CDC involvement beginning in 2013. 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.

5. <u>Impact on Small Businesses or Other Small Entities</u>

The target population consists of U.S. blood collection facilities and transfusing hospitals. Every effort is made to minimize the burden on small businesses when collecting information.

6. Consequences of Collecting the Information Less Frequent Collection

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 U.S. 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 ensure patient safety by monitoring and identifying errors in transfusion medicine and related therapies.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

This request fully complies with 5 CFR 1320.5. There are no special circumstances associated with this data collection activity.

8. Comments in Response to the Federal Register Notice/Outside Consultation

The 60-day notice for public comment was published in the Federal Register, Volume 88, No. 185, on Thursday, September 26, 2023, pp. 66010 (Attachment B). A total of one comment from America's Blood Centers organizations was received. Responses are imbedded in the public comment document (Attachment C).

9. Explanation of any Payment/Gift to Respondents

Remuneration of respondents is not provided.

10. Assurance of Confidentiality Provided to Respondents

The Privacy Act of 1974 (5 U.S.C. 552a) does not apply to the proposed data collection since respondents are not human subjects, but institutions; and no patient/donor identifiers are collected. Therefore, no Institutional Review Board review is required. Data identifying institutions will be kept private to the extent allowed by law.

11. Justification for Sensitive Questions

Information on issues of a sensitive nature involving persons is not being sought.

12. Estimates of Annualized Hour and Cost Burden

12A. The burden for the NBCUS survey is summarized in the table below (estimated using references to 2021 NBCUS). Each institution that is asked to complete the survey is considered to be a respondent. The respondents to this survey are hospitals andblood collection centers, The number of respondents is 2,890. It is estimated that each respondent will spend about 212 minutes (3.5 burden hours total; or 1 hour and 46 minutes burden hour/year) completing the questionnaire. The hourly burden estimates are based on 212 minutes from previous years' experience administering the survey and accounts for the reduction in questions in the 2023 NBCUS.

12A. Estimated Annualized Burden Hours

Type of Respondent	No. of Respondents	No. Responses per Respondent	Average Burden per Response (in hours)	Total Burden Hours
Transfusing Hospitals	2754	1	1 hour, 46 min	4,865
Hospital Blood Banks	83	1	1 hour, 46 min	147
Community- based blood center	53	1	1 hour, 46 min	94
Total	2,890			5,106

12B. The average annualized response burden cost to respondents is estimated to be \$190,862 based on an hourly wage of \$37.38 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 2022.

12B. Estimated Annualized Respondent Burden Costs

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	Total annual			
Type of respondents	response Hourly wage rate		Respondent cost	
	burden hours			
Hospitals, blood				
collection centers,	5,106	\$37.38	\$190,862	
cord blood banks				

13. <u>Estimates of other Total Annual Cost Burden to Respondents or</u> <u>Recordkeepers/Capital Costs</u>

There is no other capital or start-up costs, and no maintenance or service cost components for this information collection.

14. Annualized Cost to 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.

15. Explanation for Program Changes or Adjustments

This collection is being submitted for OMB approval as a revision on a previously approved collection (after three such 3-year approval periods); minor changes were made to some of the survey questions to facilitate usability and all other aspects of the program remain the same. The draft 2023 survey reduces the number of data items collected by eliminating supplemental sections added to both Section B and Section C to capture information on the impact of the COVID-19 pandemic on the blood supply during the course of 2020. The draft 2023 survey is shorter than the 2019 and 2021 surveys. It is estimated that each facility takes an average 3.5 hours to complete the survey.

Number of data items collected from facilities during 2013-2021.

	Number of data items collected				
NBCUS Survey section	2015	2017	2019	2021	2023
Section B (Blood Centers)	177	250	246	202	207
COVID-19 Supplemental Section B				26	

Section C (Hospitals)	187	211	194	181	180
COVID-19 Supplemental Section C				24	

16. Plans for Tabulation and Publication and Project Time Schedule

The timetable for key activities for the 2023 survey is as follows:

Timeline	
TBD	Receive OMB clearance
December 2023	Finalize NBCUS 2023 in REDCap
February 2024	Confirm contact list and submit REDCap survey to OASH for approval
March 2024	Begin data collection for 2023 survey
July 2024	End data collection
August 2024	Begin data analysis
2025	Publish final comprehensive report

Statistical tabulations of results for each question will be presented. These will be broken down by institution type, services provided, United States Public Health Service (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 (e.g., whole blood (WB) allogeneic, WB autologous, WB directed, RBC apheresis, platelets, plasma)
- Total transfusions in the U.S. broken down by type (e.g., WB, RBC, platelets, non-RBC components transfused)
- 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
- Rates of confirmed positives and false positives by bacterial testing methods

Number of adverse events (e.g., Transfusion-related acute lung injury (TRALI),
 Transfusion-associated circulatory overload (TACO), Hemolysis, Allergic reactions, etc.)

 After final validation of results a comprehensive report of findings from the survey will be published. The 2005 through 2021 Nationwide Blood Collection and Utilization reports are available at www.hhs.gov/ash/bloodsafety.

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

The program agrees to show the expiration date.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification.