

# PUBLIC SUBMISSION

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National Healthcare Safety Network

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Comment from Johns Hopkins Hospital Division of Transfusion Medicine

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## Submitter Information

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## General Comment

To the Department of Health and Human Services and the Centers for Disease Control and Prevention:

Re: Docket No. CDC-2025-0091

The Division of Transfusion Medicine at Johns Hopkins Hospital opposes the proposed changes to the Hemovigilance Module 3.0 Adverse Reaction Investigation Form that would restrict reporting to only acute hemolytic transfusion reactions (AHTR), transfusion-related acute lung injury (TRALI), and transfusion-associated circulatory overload (TACO).

As one of the earliest adopters of Hemovigilance reporting, our institution has voluntarily participated for over 15 years, submitting greater than 300 reports annually. We have willingly invested the time and resources required for comprehensive reporting because the substantial benefits to patient safety and transfusion medicine have justified this burden. Our participation has enabled us to identify emerging trends across all transfusion adverse event categories and to act upon this information in a timely manner.

Our institution will be compelled to decline further participation should these changes be implemented. We urge the CDC to maintain the current comprehensive reporting structure that has proven invaluable for protecting patients and advancing transfusion medicine.