



America's Blood Centers[®]
It's About *Life.*

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America's Blood Centers represents fifty-two independent community blood centers collecting over half of the nation's blood supply. We appreciate the October 19 "Crisis in the Sustainability of the U.S. Blood Supply" Sounding Board (Klein H, *et al*) for raising awareness of threats facing the blood community. We stress the necessity to include all stakeholders in developing solutions that assure that collection of life-saving blood remains community-based and driven by quality and safety.

The following core principles must be heeded in considering changes to the system. First, policy must be rooted in evidence and formal risk-based decision-making before promulgating public health and safety mandates. Second, hyper-competition must be addressed. Last, reimbursement for blood must capture the full costs of safety and technology initiatives and preparedness for unprecedented disaster scenarios to which the Department of Health and Human Services expects blood centers to respond. These three factors contributed to average 2016 ABC member blood center operating margins of only 1.5 percent. We look forward to working with stakeholders to sustain a vital national resource and public good.