

**Rhode Island Blood Center
405 Promenade Street
Providence, RI 02908**

Attention: Steven Sepe Committee Clerk
401-222-6899
HouseHealthandHumanServices@rilegislature.gov

Testimony in Opposition to Bill H5864

Wednesday, March 12, 2025

Dear Honorable Chair Donovan and Members of the HHS Committee,

Founded in 1979, Rhode Island Blood Center (RIBC) has been serving Rhode Island and the New England area for more than 45 years, providing over 90,000 lifesaving blood products annually to more than 50 hospitals, EMS, and healthcare partners. As part of New York Blood Center Enterprises (NYBCE), we are one of the largest nonprofit blood centers in the United States, delivering one million blood products to over 400 U.S. hospitals each year. In addition to blood products, we provide cellular therapies, specialty pharmacy, and medical services to over 200 research, academic, and biopharmaceutical organizations. Through the Lindsley F. Kimball Research Institute (LFKRI), we are also a leader in hematology and transfusion medicine research, committed to advancing global public health.

We are offering the following testimony in opposition to Bill H5864.

Section (c) – Compliance with Healthcare Provider Orders for Autologous and Directed Blood Donations

Rhode Island Blood Center, a division of New York Blood Center Enterprises Comments:
We seek clarification regarding this provision. If a blood bank does not currently have a program in place to facilitate autologous or directed blood donations, we understand that the bill would not mandate the establishment of such a program. It is important to note that some blood banks may not be equipped or staffed to handle these types of donations. Mandating this could create significant operational strain and unnecessary costs, particularly for blood banks without the resources or infrastructure to manage autologous or directed donations effectively.

Section (d) – Fees for Autologous and Directed Blood Donations

Rhode Island Blood Center, a division of New York Blood Center Enterprises Comments:
We strongly believe that blood banks should be allowed to charge additional fees for the special handling and processing required for autologous and directed donations. These procedures demand more time and coordination compared to standard allogeneic donations, including the careful preparation and earmarking of donations for specific recipients. Moreover, if a directed donation is found to be unsuitable, incompatible, or unusable for any reason (such as ineligibility

after screening or incompatibility with the intended recipient), it is only fair for the blood bank to charge a processing fee to compensate for the resources expended.

Section (e) – Department of Health Rulemaking

Rhode Island Blood Center, a division of New York Blood Center Enterprises Comments:
We respectfully oppose the introduction of additional state-level regulations on autologous and directed blood donations. The U.S. Food and Drug Administration (FDA) already enforces strict, comprehensive regulations regarding these processes. Introducing state-level regulations would result in unnecessary, duplicative compliance requirements and administrative burdens, which could lead to confusion and inefficiencies. We recommend that any regulatory framework be aligned with existing federal guidelines to ensure a streamlined and unified approach to blood donation safety.

We appreciate your consideration of these points and urge the committee to carefully assess the unintended consequences of Bill H5864. The provision of autologous and directed blood donations must be handled with expert oversight to protect the safety of both patients and donors. While we understand the intent behind this bill, we believe it could lead to unintended risks that would undermine the critical role of blood centers in providing safe, high-quality blood products.

Thank you for your time and consideration. We are committed to working with legislators to ensure the continued safety and availability of blood products in Rhode Island and nationwide.

Sincerely,

Keith Heim

Keith Heim

Vice President Mid-Atlantic Regional Operations
Rhode Island Blood Center, a division of New York Blood Center Enterprises