

June 1, 1997 (6:32PM)
Paul R. McCurdy, MD

DRAFT

Advisory Committee on Blood Safety and Availability

Minutes

First Meeting April 24-25, 1997

The Acting Executive Secretary called the first meeting of the Committee to order at 9:15 AM and introduced the 18 members, one consultant and six ex officio non-voting members representing six Federal Agencies (see attached list). The committee members were reminded of the information they were given by mail on ethical aspects of serving on this committee and were referred to the Office of General Council for clarification, further information, etc., as needed. Dr. Arthur Caplan then took the Chair.

In opening remarks, the Chairman noted the important advisory role of the Committee, the importance of the issues to be discussed at this meeting and the need for more than one meeting annually for the Committee to serve its purpose. He then introduced the Acting Assistant Secretary for Health (ASH).

The Acting ASH sketched the historical background of the Committee, stemming from a report commissioned by the Secretary of the Department of Health and Human Services (DHHS) from the Institute of Medicine (IOM) about the rise of AIDS in the early 80s and the infection of a large portion of patients with hemophilia by HIV contaminated clotting factor concentrates. To strengthen the decision-making process, the IOM report recommended the establishment of a Blood Safety Committee within DHHS under the Department's lead blood safety director (ASH has been so designated) and of an outside advisory group to consider not only scientific issues but also consumer and societal factors as they compare risks and benefits of various actions and provide their advice.

This is the first meeting of that outside advisory group. She further outlined the scope of blood safety activities in the Department and then called upon Agency representatives to describe each individual agency's cooperative role.

The Centers for Disease Control and Prevention (CDC) is the Federal public health agency that works with state health officials to detect and investigate threats to public health. With substantial intramural epidemiologic and laboratory expertise, the CDC can provide a rapid response to perceived problems for both acute threats and long term studies. Key activities include surveillance, epidemiologic investigations of outbreaks from blood and blood products and the development of prevention and control strategies. They can also provide information as to supply and shortages of some products, e.g., gamma globulin, both non-specific and specific for certain organisms. There are seven sentinel sites around the US to provide early warning about emerging infections. The Committee is needed to provide wise counsel for making difficult decisions concerning blood safety in the midst of many societal issues. The CDC also hopes that the Committee will be helpful in identifying and implementing better ways of risk communication, both known and unknown.

The Food and Drug Administration (FDA) is charged with addressing safety and efficacy as they regulate blood and blood products, but the issue of how safe is safe enough is omnipresent. In particular, there are no drugs, biologics or devices that are 100 percent safe. Regulatory activity can be set at more than one level of safety, but each may have a different effect on supply. A proposal to test non-virally inactivated gamma globulin for hepatitis C virus (HCV) with a PCR-based procedure stimulated manufacturers to pull untested material from the market. This resulted in critical shortages of some products. This Committee will help balance some of these competing priorities in the advice provided to the Department.

The blood safety role of the National Institutes of Health (NIH) and one of its constituent Institutes,

the National Heart, Lung, and Blood Institute (NHLBI) is to support research. Several studies to reduce the transmission of infectious diseases by blood transfusion and improve safety were cited as examples. A number of the research resources, past and present, developed under NHLBI support have been made available to answer current safety questions, including some involving emerging viruses. The NHLBI works closely with the FDA and the CDC in supplementing and complementing their activities with sponsored research.

Ms. Mary Gustafson (FDA) provided the statutory basis for the regulation of blood and blood products, beginning with Acts passed at the turn of the last century and progressing with amendments and court decisions to the present. She also discussed the regulation of blood centers vs transfusion services, devices vs drugs or biologics, intrastate vs interstate, etc. Most importantly, expected standards are the same, although the level and source of inspections and regulations may differ.

Dr. Paul Mied (summary mailed to members in advance) provided an overview of FDA policies for lookback involving various infectious agents, HIV, HBV (Hepatitis B Virus), HCV and HTLV (Human T-cell lymphotropic virus). Lookback involves product retrieval, if any has been distributed but not used, and recipient notification. The most elaborately stated lookback rules are for HIV seroconverting donors. At issue is whether or not these other than product retrieval should be applied to other agents and if so, which ones. This discussion applied primarily to fresh blood products or components; plasma protein derivatives (e.g., clotting factor concentrates) are quite safe from enveloped viruses such as HCV because of the virus inactivation procedures used in their purification. There was also mention of reverse targeted lookback, defined as from an ascertained recipient seroconversion back to the donor and back again to other recipients.

Dr. Jay Hoofnagle (NIDDK) summarized current knowledge of the clinical features of hepatitis C. Its

Dr. Glenn Pierce (NHF) commented during the Open Public Discussion (Attached).

Dr. Cesio Bianco (ABC) commented during the Open Public Discussion (Attached).

Dr. Steve Kleinman (ABB) commented during the Open Public Discussion (Attached).

discussions in the past have been considered self-serving when given by blood bankers. Costliness of attempting retrospective HCV-positive donor-directed lookback, commenting that such costliness with the HCV antibody tests, however. He finished with a brief discussion of the inefficiency and surrogate tests, although there was no question of lookback. More infectious donors were screened out with the HCV antibody tests, although some HCV infected blood donors were detected by

Dr. Merlyn Sayers (Dallas) pointed out that some HCV infected blood donors were detected by opportunity for prevention in drug users at this point. From transfusion, but by the time they are in treatment, they are already infected. There is little education re hepatitis C. More patients with hepatitis C were infected through shared needles than lookback, e.g., focused lookback from positive donors or a push toward public and professional transfusion or sharing of contaminated needles during drug use. He also discussed approaches to Dr. Harold Margolis (CDC) emphasized that nearly all hepatitis C comes from parenteral exposure,

rate is relatively low — 15-30 percent. Twelve months of therapy seems better than six. Problems for detection. Interferon is the only therapy available for HCV infection and its response estimate is around 25 percent --, most do not. The virus itself is quite variable, posing potential prolonged periods. Although some patients with chronic hepatitis C develop cirrhosis -- one remain intermittently or continuously viremic and 60 percent have abnormal liver enzymes for most important feature is its tendency toward chronicity. Eighty-five or more percent of patients

issue can also be divided by time: pre-1990, 1990-1997, and forward from now. Further, heavy and former patients and of physicians involved in the follow-up care of those patients. The lookback and former patients and of physicians involved in the follow-up care of those patients. The lookback the lookback issue. There was considerable discussion on the need for education, both of patients prefers either a policy statement or something that can be readily turned into a policy statement on some rationale or explanation as part of how it (the committee) thinks it can be most useful. D.H.S. framework, more of principles, more of points to consider, statements that might be supported by opinions and perhaps a guidance document that would advise re policy. This would be "more of a reluctance to be bound by yes-no answers to such questions, preferring instead more narrative posed by the PHS as options to be discussed and selected (Attached). The Committee was The Committee then revisited the hepatitis C lookback issue, first reviewing a series of questions

overview of the blood banking establishment and its multiple parts as it exists today in the US. Dr. Thomas Zuck (Hoxworth Blood Center, Cincinnati, temporarily at the NY Blood Center) gave an

The Committee reassembled at 8:30 AM, April 25, 1997.

At 5:15, the Committee recessed until 8:30 the following morning.

Patient with HCV got his/her infection from the transfusion?

Blood recipients from several years ago are still alive? Is it appropriate to assume that a transfused data from HCV infection. Legal implications of notifying recipients of possible infections. How many need to be made available. Other questions raised by the committee include: Mortality and mortality about costs vs benefits of HCV lookback. To factor that into the discussion, more information would Britain and in Australia. More information would be of interest. Similarly, there was no presentation There was limited reference to lookback programs in Canada (varies from province to province), in

Edward Burke, a person with hemophilia, commented during the Open Public Discussion.

If they are infectious during that time, most pools are so contaminated and have been for many years. pools contain plasma from individuals incubating CJD — the incubation period may be 20-40 years. and study this further. He finished by suggesting, mathematically, that many if not most plasma suggest transmission by intravenous blood transfusion. Additional research is needed to confirm Dr. Robert Rowher (VAH, Baltimore) described studies with hamster-adapted scrapie that did

planned to determine if intravenous injection can transmit plasma,uffy coat and cryoprecipitate can transmit by intracerebral injection. Additional studies are data are limited. He described studies done with a mouse-adapted strain of CJD showing that parenteral transmission by blood transfusion theoretically can happen, but experimental transmission, most notably by intracerebral injection, but occasionally, although inefficiently by overview of CJD and other transmissible spongiform encephalopathies (TSE). These disorders are The Committee then turned to presentations on CJD. Dr. Paul Brown (NINDS, NIH) provided an

would plan to finalize recommendations, using these documents as a start. discussion and additional Committee education. At the next meeting (time TBD), the Committee given as to how to deal with them. It was decided that these drafts would be the basis for further that patients would be created — those found to harbor the HCV — and that some thought should be supplemental test]. There was considerable discussion as to ways and means, with some emphasis between 1990 and 1992 (the introduction of the second generation HCV antibody test and of a that a global public information effort be directed at subjects transfused both before 1990 and policy statements concerning HCV lookback (Attached). During the discussion, it was suggested Committee again revisited the HCV issue. Drs. John Penner and W. Keith Hoots presented draft After a brief break, two presentations on Creutzfeldt-Jakob Disease (CJD)(vide infra) and lunch, the

users may need to be dealt with differently than occasional users of blood.

years.

Dr. Larry Schonberger (CDC) discussed the epidemiology of CJD, with particular regard to transmission by transfusion of blood or blood products. None of the studies, case control, general surveillance or death certificate review were able to identify blood transmission as a risk factor for getting CJD. This included very recent studies of a group of patients with hemophilia who were treated nearly exclusively with cryoprecipitate from before 1970 to the mid-1980s.

Ms. Sullivan presented the (negative) results of Red Cross lookback to recipients of blood from donors who later came down with CJD.

Dr. Mark Weinstein presented the FDA's current and immediate past response to the CJD issue, including recall of products, etc. The recall policy, initial and revised, cut deeply into the supply of plasma protein derivatives, but is not known to have caused a patient-harming shortage. Dr. Peter Page (ARC, NHA) discussed how multiple recalls have affected derivative supply and manufacturer's costs. Shortages have not yet directly affected patients. Red Cross has lost

CJD are not destroyed by current treatment methods; non-lipid enveloped viruses and agents such as the one for hepatitis A are a bellwether of infectious agents in the blood supply. Lipid enveloped viruses are well

community as concerned that products used by them, made from pools of up to 60,000 donors, make them a bellwether of infectious agents in the blood supply. Lipid enveloped viruses are well known to be more stable than non-lipid enveloped viruses, and can survive for months to years at room temperature. Dr. Glenn Pierce presented the CJD issue from the viewpoint of patients with hemophilia. Having been infected in the past with hepatitis and HIV, the hemophiliacs destroyed by current treatment methods; non-lipid enveloped viruses and agents such as the one for hepatitis A are a bellwether of infectious agents in the blood supply. Lipid enveloped viruses are well

derivatives worth more than \$100 million.

Dr. Peter Page (ARC, NHA) discussed how multiple recalls have affected derivative supply and

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Dr. Celsio Bianco (NY Blood Centre) made a presentation on behalf of America, Blood Centres, Mr. Bell on behalf of the International Plasma Products Industry Association (IPPIA) and Dr. Kleinman on behalf of the AABB (See Attached). The meeting concluded with a presentation from Ms. Angie Hendrickson, mother of a 14 year old with hemophilia A who has AIDS, HCV infection and has been afflicted with parvo virus infection. She reported CD withdrawal notifications since 1994. She expressed concern about mixed messages, now and in the past, and pleaded for direct attention to blood safety.

Dr. Goosby closed the meeting with brief remarks.

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