APPENDIX G

VISTA BLOOD BANK USER MANUAL SAFETY CRITICAL REQUIREMENTS

Table of Contents

**V***IST***A** Laboratory Blood Bank Software Version 5.2 5

Safety Critical Requirements 5

[Introduction 5](#_TOC_250007)

[BLOOD PRODUCT file (#66) Data Elements and Descriptions of Use 7](#_TOC_250006)

[Donor Safety Critical Requirements 11](#_TOC_250005)

1. [Donor Functions 11](#_TOC_250004)

[Inventory Safety Critical Requirements 15](#_TOC_250003)

1. [Inventory Functions 15](#_TOC_250002)

[Patient Safety Critical Requirements 19](#_TOC_250001)

1. [Patient Functions 19](#_TOC_250000)

Table of Contents

VISTA Laboratory Blood Bank Software Version 5.2 Safety Critical Requirements

## Introduction

As defined by the Food and Drug Administration (FDA), a safety critical requirement is one that is implemented to ensure the safety, quality, identity, potency and purity of blood/blood products and/or donor safety. These requirements are based on a variety of regulatory and accreditation requirements of the FDA, the American Association of Blood Banks (AABB) and the College of American Pathologists (CAP). Consistent with the software and the other documentation, the safety critical requirements detailed in this document have been divided into three major categories, (i.e., donor, inventory and patient). These categories relate to the file structures used for data storage as well as to the logical groupings of functional activities in the blood bank.

Information provided in Appendix E of the Blood Bank User’s Manual provides details for each of the Blood Bank files. Included are some ancillary files which are not fully detailed in this document, but have some software control and should be used as an additional reference.

In Appendix F of the Blood Bank User Manual, a listing is provided of the fields and subfields for the files used for data storage for each of the major categories. The format selected indicates the hierarchical arrangement of the file structure. In addition to the field number and field name, a designation has been included to indicate whether changes in verified data for that specific field for that specific donor/unit/patient are tracked by being entered on the audit trail. Fields that exist, but are not currently in use have been included and have been so designated. For those fields which are not accessible for editing or which serve as the reference point for the subfields, an ‘NA’ has been used.

A listing of the safety critical requirements is provided on the following pages. These are also referenced in the software requirement specifications in Appendix H and the hazard analysis in Appendix 1. Appendix H of the Blood Bank User’s Manual provides additional details on the software requirements specifications.

These will include the design safeguard, e.g. algorithms, truth tables, error checking, record locking, etc. to ensure that the safety critical requirements(s) is met.

Safety Critical Requirements Introduction

# BLOOD PRODUCT file (#66) Data Elements and Descriptions of Use

Because the BLOOD PRODUCT file (#66) plays a significant role in the software design and is referenced frequently in the safety critical requirements, the listing of the data elements is provided here as a quick reference.

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| **Field #** | **Field Name** | **Description Of Use** |
| .01 | NAME | Identifies product. |
| .02 | ABBREVIATION | Characteristic used to access/identify this specific component. |
| .03 | CAN BE MODIFIED | Determines whether this product can be modified into other products. |
| .04 | IDENTIFIER | Determines whether this file entry can be acc component/derivatives with IDENTIFIER  = BB) should be accessible at any prompt which references component. |
| .05 | PRODUCT CODE | Characteristic used to by bar code reader or by manual entry to access this specific  component. |
| .055 | DOD CODE | Used by the Department of Defense. |
| .06 | MODIFICATION CRITERIA | Determines the edit template used when this product is selected during modification of another product. |
| .07 | PATIENT/PRODUCT ABO | Determines whether units selected for a patient must be identical or must be red cell compatible. |
| .08 | PATIENT/PRODUCT RH | Determines whether units selected for a patient must be identical or must be red  cell compatible. |
| .09 | PATIENT/PRODUCT REQUIREMENT | Determines whether units must be crossmatched or if the product contains large volumes of plasma that should be compatible with the patient’s red cells. |
| 1 | VOLUME (ml) | Characteristic |
| .11 | DAYS LEFT | Calculates the new expiration date required if this product is prepared from another product present in inventory. |

BLOOD PRODUCT file (#66) Data Elements and Descriptions of Use

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| **Field #** | **Field Name** | **Description Of Use** |
| .12 | ANTICOAGULANT/ ADDITIVE | Prevents mixing of components during modifications (e.g., a product that has CPDA- I cannot be modified to a product that has CPD as the anticoagulant). |
| .13 | COLLECTION/PREP HOURS | In the donor module options only,  (i.e., indicates the maximum time allowable between the Date/Time Collection Started field (#65.54,4.2) and the Date/Time Stored field (#65.66, .03). |
| .135 | MAXIMUM STORAGE DAYS | In the donor module option, calculates the default shown for the Expiration Date field (# .04), in the Inventory Module option, Screens the Entry For the Expiration Date/ Time field (#.06) for potential data entry  errors. |
| .14 | MODIFIED BEFORE RELEASE | Prevents issue/relocation of products which must be modified such as Frozen Red Blood Cells which must be deglycerolized before issue. |
| .15 | CAN BE REQUESTED | Prevents selection of products that should not be accessed/selected. |
| .16 | PATIENT SPECIMEN AGE ALLOWED | Prevents selection of units of this product for specimens. IF the difference between the current time and the BLOOD SAMPLE DATE/TIME exceeds the entry in this field  for this product. |
| .18 | RETYPE AFTER PREPARATION | Determines whether units of this product must be retyped before issue/release.  If YES, units which are created using the Disposition-not transfused [LRBLIDN] option will appear on the Inventory ABO/Rh testing worksheet generated by the [LRBLIW] option. |
| .19 | CONTAINS RED BLOOD CELLS | 1. Determines whether units of this product retyped before issue/release. If YES, units will not be able to be released using the Disposition-relocation [LRBLIDR] option until required recheck results are entered. 2. Used for sorting purposes on some reports. |
| .21 | MAX AGE FOR PEDIATRIC  USE | Determines whether units of this product  can be modified into pediatric units. |
| .22 | PEDIATRIC PRODUCT | Determines which products can be accessed when modifying a unit in inventory using the Pediatric unit preparation [LRBLPED] option; (both must also have the same entry in the BLOOD PRODUCT file (#66), Anticoagulant/Additive field (#12). |

BLOOD PRODUCT file (#66) Data Elements and Descriptions of Use

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| **Field #** | **Field Name** | **Description Of Use** |
| .23 | SPECIFIC GRAVITY | In the Pediatric unit preparation [LRBLPED] option, (i.e., used to convert the volume of the unit in mls. into an equivalent wt. in gms). |
| .24 | MAXIMUM INFUSION TIME(MIN) | Used to determine which units should be included in the Prolonged transfusion times report. The report is generated by the Prolonged transfusion times [LRBLPIT] option. |
| .25 | AUTOLOGOUS/DIRECTED COMPONENT | Determines whether additional data is needed to restrict selection of the unit for the intended patient Restricted For field (#8) of the BLOOD INVENTORY file (#65). |
| .26 | ADMINISTRATIVE CATEGORY | Used to determine which units should be incl several different reports, (e.g., Phenotyped Units Available [LRBLIPH] and Blood Bank  Administrative Data [LRBLA] options). |
| .27 | POOLED PRODUCT | Determines whether a unit specific product can be accessed through the  Edit Pooled Blood Product [LRBLJM] option; by the Blood bank inventory integrity  report [LLRBLII] option to determine which fields may have missing data. |
| .28 | ASK BAG LOT # | Determines whether the BLOOD INVENTORY file (#65), Bag Lot # field (#1) should be included in the edit template used Disposition-not transfused [LRBLIDN]  option when modifying units. |
| 1 | DESCRIPTION Subfile (#66.09)  Description field (#.01) | Intended for use for display purposes in future. |
| 2 | SYNONYM Subfile (#66.021)  Synonym field (#.01) | Used for look-up access purposes only. |
| 3 | MODIFY TO Subfile (#66.03)  Number field (#.001) | Internal file number. |
| .01 | MODIFY TO | Determines which products can be accessed when modifying a unit in inventory using the Disposition-not transfused [LRBLIDN] option. |
| .02 | NOT ONLY ONE ALLOWED | Determines whether more than one product may be created when modifying a unit in inventory using the Disposition-not transfused [LRBLIDN] option. |
| 4 | SUPPLIER Subfile (#66.01)  Preference number field (#.01) | Controls the display order. |
| .01 | SUPPLIER Name of supplier | Determines characteristics based on subfields detailed below. |
| .02 | COST | Calculates expenses for reports. |
| .03 | ADDRESS LINE 1 | Used for look-up and information purposes only. |

BLOOD PRODUCT file (#66) Data Elements and Descriptions of Use

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| **Field #** | **Field Name** | **Description Of Use** |
| .04 | ADDRESS LINE 2 | Used for look-up and information purposes only. |
| .08 | ZIP CODE | Used for look-up and information purposes only. |
| .09 | PHONE | Used for look-up and information purposes only. |
| .01 | LOT # | Not currently used by the software. |
| .02 | Expiration Date | Not currently used by the software. |
| 5 | CRITERIA FOR USE Subfile  (#66.05), Criteria For Use field (#.01) | Intended for use for display purposes in the future |
| 6 | TESTS TO CHECK Subfile (#66.04), Tests To Check field  (#.01) | Used to identify/flag non pre-op requests that exceed the audit criteria  (may enter more than one). |
| .02 | SPECIMEN | Type of specimen used for test. |
| .03 | > OR < TEST VALUE | Value to be used to identify/flag non pre-op component requests that exceed the audit criteria. |
| 7 | REQUISITION INSTRUCTIONS  Subfile (#66.07), Requisition  Instructions field (#.01) | Intended for use for display purposes in the future. |
| 8 | PRE-OP TESTS TO CHECK  Subfile (#66.08), Pre-Op Tests To Check field (# .01) | Used to identify/flag pre-op component requests that exceed the audit criteria (may enter more than one). |
| .02 | SPECIMEN Type of specimen used for test .03 > OR < TEST VALUE | Value to be used to identify/flag pre-op component requests that exceed the audit  criteria. |
| .01 | WKLD CODE | Used for workload captures by the Disposition -not transfused [LRBLIDN] option and the Collection disposition/ component preparation [LRBLDCP] option. |

# Donor Safety Critical Requirements

As with the file structure and the documentation, the safety critical requirements are divided three major categories, donor (D), inventory (I) and patient (P). Within each of the major categories, the term ‘general’ has been used for those SCR which involve more than one functionality.

## Donor Functions

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| **SCR#** | **Functionality** | **Description** |
| D1 | Donor - General | A unique cumulative donor record must exist for each individual blood donor/patient. |
| D2 | Donor - General | A system to ensure confidentiality of donor Records must be established and followed. |
| D3 | Donor - General | A unique cumulative donation sub-record must exist for each individual blood donation. |
| D4 | Donor - General | Data should be accurate and the potential for data entry errors should be minimized when  ever possible. |
| D5 | Donor - General | A system must exist to track changes made to verified data for specified data elements. |
| D6 | Donor - General | A system must exist to require a higher level of security access in order to perform specified functions, (e.g., removal of units  from quarantine). |
| D7 | Donor - General | Each facility must have a record-keeping system which makes it possible to trace any unit of blood/blood component from source to final disposition, to recheck the records applying to a specific unit and to investigate adverse reactions manifested by the recipient. |
| D8 | Donor - General | Facility records be complete, retrievable in a reasonable period of time, preserved and protected from accidental or unauthorized destruction of modification and maintained for the required retention period. |
| D9 | Donor - General | Autologous units and directed donor units should be made available for a patient before  homologous blood is selected. |
| D10 | Donor-Registration, Screening, and Collection | Allogeneic (homologous and directed) blood donors may and Collection not donate whole blood more often than every 8 weeks. |
| D11 | Donor-Registration, Screening, and Collection | If blood donors are not at least 17 years of age, they and Collection must have permission to donate. Prospective donors who are considered minors may be accepted if written consent to donate has been obtained in accord with applicable law. |

Donor Safety Critical Requirements

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| **SCR#** | **Functionality** | **Description** |
| D12 | Donor-Registration, Screening, and Collection | Elderly prospective donors may be accepted at the and Collection discretion of the blood bank physician. |
| D13 | Donor-Registration, Screening, and Collection | Donor history questions must meet the requirements of and Collection the FDA and the AABB. |
| D14 | Donor-Registration, Screening, and Collection | All permanently deferred donors must be appropriately and Collection identified in order to prevent the donation or the inappropriate release of units to inventory. |
| D15 | Donor-Registration, Screening, and Collection | All permanent deferral information must be traceable, and Collection including changes in  status.. |
| D16 | Donor-Registration, Screening, and Collection | Donors who require special handling should be and Collection identified so that appropriate procedures can be implemented. |
| D17 | Donor-Registration, Screening, and Collection | All units collected in bags of a specific lot must be able and Collection to be identified in case of potential recalls. |
| D18 | Donor-Component Preparation | A mechanism must exist to track all collection dispositions and to track the storage of each/all components prepared. |
| D19 | Donor-Component Preparation | Components must be prepared within the maximum time allowable for that specific  component. |
| D20 | Donor-Component Preparation | If the dating period for the product is < 72 hours, the expiration date must include the hour of expiration. |
| D21 | Donor-Processing/ Transfusion transmitted disease (TDD) marker testing | Current ABO/Rh test results must be in agreement transmitted disease (TDD) with the donor’s historical record, and if a discrepancy marker testing exists, release of units of blood/ blood components to inventory requires a higher level of security access. |
| D22 | Donor-Processing/ Transfusion transmitted disease (TDD) marker  testing | Implementation of the required transfusion transmitted disease (TTD) transmitted disease marker testing must be done as marker testing  required by the FDA. |
| D23 | Donor-Processing/ Transfusion transmitted disease (TDD) marker testing | A system should exist for detecting missing specimens transmitted disease (TTD) in order to minimize the possibility of errors in marker testing transfusion transmitted disease marker testing. |

Donor Safety Critical Requirements

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| **SCR#** | **Functionality** | **Description** |
| D24 | Donor-Processing/ Transfusion transmitted disease (TDD) marker testing | If results are entered after the unit of blood/ blood transmitted disease (TDD) component has been released on an emergency basis, marker testing the results must be immediately evaluated to determine whether the quality or the safety of the product is adversely affected. |
| D25 | Donor-Labeling/Release | Units cannot be released to inventory, even under emergency circumstances, until current ABO/Rh testing has been entered. |
| D26 | Donor-Labeling/Release | Under routine circumstances, allogeneic should only be released to inventory after all of the required testing has been completed and meets current FDA requirements. |
| D27 | Donor-Labeling/Release | Sufficient safeguards should be in place in the labeling/release procedure to prevent labeling  errors. |
| D28 | Donor-Labeling/Release | Whenever possible, technology should be utilized to verify the accuracy of labeling instead of relying on a second person. |
| D29 | Donor-Labeling/Release | A unique cumulative unit record must be created in the Inventory File when units are released from the Donor File in order to prevent data entry errors. |
| D30 | Donor-Labeling/Release | A mechanism must exist to track the final disposition of each and all components prepared. |

Donor Safety Critical Requirements

# Inventory Safety Critical Requirements

## Inventory Functions

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| **SCR#** | **Functionality** | **Description** |
| 11 | Inventory General | A unique cumulative unit history record must exist for each individual blood component. |
| 12 | Inventory General | A system to ensure confidentiality of patient records/transfusion histories must be established and followed. |
| 13 | Inventory General | Data should be accurate and the potential for data entry errors should be minimized  whenever possible. |
| 14 | Inventory General | A system must exist to track changes made to verified data for specified data elements. |
| 15 | Inventory General | A system must exist to require a higher level of security access in order to perform specified functions. |
| 16 | Inventory General | Each facility must have a record-keeping system that makes it possible to trace any unit of blood/blood component from source to final disposition, to recheck the records applying to a specific unit and to investigate adverse reactions manifested by the recipient. |
| 17 | Inventory General | Facility records be complete, retrievable in a reasonable period of time, preserved and protected from accidental or unauthorized destruction of modification and maintained  for the required retention period. |
| 18 | Inventory General | Autologous units and directed donor units should be made available for a patient before homologous blood is selected. |
| 19 | Inventory General | Required A.BO/Rh confirmatory testing must be done after the unit has been labeled to permit detection of labeling errors. |
| 110 | Inventory Receipt, Shipment, and Discard of Units | If the dating period for the product is 72 hours, the and Discard of Units expiration date must include the hour of expiration. |
| 111 | Inventory Receipt, Shipment, and Discard of Units | If units are shipped outside of the collecting facility, all and Discard of Units required transfusion transmitted disease marker testing must have been performed and units must be handled in accordance with FDA  regulations. |

Inventory Safety Critical Requirements

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| **SCR#** | **Functionality** | **Description** |
| 112 | Inventory Receipt, Shipment, and Discard of Units | Facilities need to maintain shipping records indicating and Discard of Units that appropriate temperatures have been maintained. |
| 113 | Inventory - Confirmation Testing of units | Test results for confirmatory ABO/Rh must be in of units agreement with the unit’s historical record and the unit may not be released for transfusion if a discrepancy exists. |
| 114 | Inventory – Modification of Units | Critical information regarding patient assignments (if Units any), special phenotypings, CMV antibody status, etc. is maintained when a unit is modified. |
| 115 | Inventory – Modification of Units | If any unit within a pooled product is Rh positive, the Units pooled product should be  labeled as Rh positive. |
| 116 | Inventory – Modification of units | Appropriate procedures must be in place to minimize Units risks to employees who may handle biohazardous materials., i.e. units with incomplete or positive test results for transfusion transmitted disease markers. |
| 117 | Inventory - Modification of units | Records must be maintained of the lot numbers of all Units bags used in the manufacturing process and a specific lot must be able to be identified in case of potential recalls. |
| 118 | Inventory - Issue\relocation of units for transfusion | Delays in providing appropriately tested units for units for transfusion should be  minimized. |
| 119 | Inventory - Issue/relocation of units for transfusion | Before a unit is released for transfusion, current test units for transfusion results should be complete and compared with the patient history to detect possible ors in ABO/Rh or a previous history of a clinically significant antibody. |
| 120 | Inventory - Issue\relocation of units for transfusion | Required ABO/Rh confirmatory testing must be units for transfusion completed before the unit is released for transfusion. |
| 121 | Inventory - Issue\relocation of units for transfusion | Units shall not be issued for transfusion if the visual units for transfusion inspection indicates the presence of an abnormal color  or physical appearance. |
| 122 | Inventory - Issue\relocation of units for transfusion | Units should not be transfused after the expiration units for transfusion date & time indicated on the unit. |

Inventory Safety Critical Requirements

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| **SCR#** | **Functionality** | **Description** |
| 123 | Inventory - Issue\relocation of units for transfusion | Units which require further modification, such as units for transfusion frozen red blood cells, must not be issued until further modification has been completed. |
| 124 | Inventory - Issue\relocation of units for transfusion | A label or tie tag with the required information must units for transfusion be attached to the unit before it is issued for transfusion. |
| 125 | Inventory - Phenotyping of units | A standardized coding system should be utilized for units identifying both RBC and HLA antigens and antibodies in order to minimize problems associated with free text. |
| 126 | Inventory - Release of units to stock/available inventory | Autologous units which are collected preoperatively stock/available inventory must be segregated and used solely for this purpose unless the donor-patient and the donated unit meet all of the allogeneic donor  requirements. |

Inventory Safety Critical Requirements

# Patient Safety Critical Requirements

## Patient Functions

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| **SCR#** | **Functionality** | **Description** |
| P1 | Patient - General | A unique cumulative patient history record must exist for each patient that includes the ABO/Rh, clinically significant antibodies, transfusion reactions and units transfused. |
| P2 | Patient - General | A system to ensure confidentiality of patient records/transfusion histories must be established and followed. |
| P3 | Patient - General | Data should be accurate and the potential for data entry errors should be minimized  whenever possible. |
| P4 | Patient - General | A system must exist to track changes made to verified data for specified data elements. |
| P5 | Patient - General | When changes are made in data which has been previously transmitted outside of the laboratory, there must be a means to clearly identify the original and the corrected data. |
| P6 | Patient - General | A system must exist to require a higher level of security access in order to perform specified functions, (e.g., approval of the status change to ‘assigned’ for units with incompatible crossmatches which may be transfused with the Blood Bank Medical  Director’s approval. |
| P7 | Patient - General | A standardized coding system should be utilized for identifying RBC antigens and antibodies in order to minimize problems associated with free text. |
| P8 | Patient - General | Supervisors should review test results and exception reports. |
| P9 | Patient - General | Each facility must have a record-keeping system which makes it possible to trace any transfusion from receipt of the unit to final disposition, including, but not limited to, confirmatory testing, pretransfusion testing (if applicable) and issue/relocation. |
| P10 | Patient - General | Facility records, including patient ABO/Rh results for the past 12 months and any previous history of clinically significant antibodies must be retrievable in a reasonable period of time, preserved and protected from accidental or unauthorized destruction or modification and maintained  for the required retention period. |

Patient Safety Critical Requirements

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| **SCR#** | **Functionality** | **Description** |
| P11 | Patient - General | In order to provide appropriate clinical information to the patient’s MD, the patient’s physician should be notified of abnormal test results. |
| P12 | Patient - Old records | Patients with a previous history of a clinically significant antibody or a transfusion reaction should be identified so that appropriate blood components can be selected. |
| P13 | Patient - Specimen receipt and order entry | Requests for blood components must contain sufficient order entry on for positive identification of the recipient, i.e. at least the first and last names and an identification number. |
| P14 | Patient - Specimen receipt and order entry | Before a unit is released for transfusion, current test order entry results must be compared with the patient history to detect possible errors in ABO/Rh or a previous  history of a clinically significant antibody. |
| P15 | Patient - Specimen receipt and order entry | Before a specimen is used for pretransfusion testing, an order entry qualified person in the transfusion service must be confirm the identification information on the request form and the specimen label which includes at least the recipient’s first and last names, identification number and the date of the sample collection. |
| P16 | Patient - Specimen receipt and order entry | If the patient has been transfused in the preceding three order entry months with a blood component containing red blood cells or if the history is uncertain or unavailable, the specimen used for pretransfusion testing must be obtained from the patient within three days of the scheduled transfusion. |
| P17 | Patient - Specimen receipt and order entry | Because of the risks inherent to blood transfusion, order entry there needs to be an active blood usage review process. |
| P18 | Patient - Specimen receipt and order entry | Autologous and directed units should be made order entry available for patient before  allogeneic (homologous) blood is selected. |
| P19 | Patient - Specimen receipt and order entry | Access to components which require further processing order entry should be limited. |
| P20 | Patient - Test result entry (other than crossmatching) | Each blood sample must be tested for ABO/Rh and for (other than crossmatching) unexpected antibodies as part of the pre- transfusion testing. |
| P21 | Patient - Unit selection and pretransfusion testing | Access to units which are expired should be limited pretransfusion testing. |
| P22 | Patient - Unit selection and pretransfusion testing | Required ABO/Rh confirmatory testing must be done to pretransfusion testing permit  detection of labeling errors. |

Patient Safety Critical Requirements

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| **SCR#** | **Functionality** | **Description** |
| P23 | Patient - Unit selection and pretransfusion testing | Recipients shall receive ABO specific whole blood or pretransfusion testing ABO compatible red blood cell components. |
| P24 | Patient - Unit selection and pretransfusion testing | Rh negative recipients should receive Rh negative red pretransfusion testing blood cells. |
| P25 | Patient - Unit selection and pretransfusion testing | Criteria for selection of units for transfusion must be pretransfusion testing defined and should be component specific and deviations must be approved and documented per the facility’s SOP. |
| P26 | Patient - Unit selection and pretransfusion testing | Criteria for required testing must be defined and pretransfusion testing should be  component specific. |
| P27 | Patient - Unit selection and pretransfusion testing | The rationale for the release of units which are not pretransfusion testing ABO/Rh compatible must be provided by the requesting physician and must be documented. |
| P28 | Patient - Unit selection and pretransfusion testing | Required compatibility testing must be performed and pretransfusion testing results acceptable before the unit is made available for issue for subsequent transfusion. |
| P29 | Patient - Unit selection and pretransfusion testing | Before a unit is released for transfusion, current test pretransfusion testing results should be compared with the patient history to detect possible errors in ABO/Rh or a previous history of a clinically significant antibody. |
| P30 | Patient - Unit selection and pretransfusion testing | A label or tie tag with the recipients first and last pretransfusion testing names and  identification number, the donor unit number and the interpretation of the compatibility tests, if performed, must be attached to the unit before it is issued for transfusion. |
| P31 | Patient - Unit selection and pretransfusion testing | If clinically significant antibodies are demonstrated or pretransfusion testing if there is a history of such, units should lack  the corresponding red cell antigen. |
| P32 | Patient - Investigation of adverse effects | A mechanism must exist to record and evaluate all diverse effects cases of suspected transmitted disease. |
| P33 | Patient - Investigation of adverse effects | Each facility shall have a system for documenting adverse effects transfusion complications in the patient's record. |