

From: [kerri steckler](#)
To: [Herzog, Andrea \(HRSA\)](#)
Subject: ACCV public meeting 5/18
Date: Friday, May 08, 2020 5:54:52 PM

Ms.Herzog,

I am writing to register comments regarding the Discussion of the Draft National Vaccine Injury Compensation Program Notice of Proposed Rulemaking (NPRM) on May 18, 2020.

I would like to say that I DO NOT believe Syncope and Shoulder Injury Related to Vaccine Administration (SIRVA) from the Federal Vaccine Injury Table (VIT). These 2 items make up a large proportion of the injuries that currently get compensated and removing them will not allow anyone that is injured in the future to receive compensation. When a large portion of funds paid out are for a specific injury, there is obviously a need to keep track of and provide assistance to those who suffer an injury of this type. Removal of these diagnoses would be negligence on the part of the ACCV.

Also, changing the rules for compensation without a public hearing and without allowing for various agencies to present scientific evidence or allowing the commission discussions does not follow precedence in regard to how these types of changes to the VIT were made in the past. Legally, according to The National Childhood Injury Act: Section §300aa-14, certain steps need to occur prior to making any changes to the VIT. These steps include a public hearing, 180 day open comment period, a 90 day time period for the ACCV to make recommendations and comments on proposed changes (after providing a copy of changes to the ADDV).

Additionally, according to The Guiding Principles For Recommending Changes to the Vaccine Injury Table (March 2006), the ACCV "shall utilize the following overarching guiding principles:

The Table should be scientifically and medically credible; and Where there is credible scientific and medical evidence both to support and to reject a proposed change (addition or deletion) to the Table, the change should, whenever possible, be made to the benefit of petitioners". The removal of two injuries for which a significant amount of compensation occurs does not benefit petitioners and therefore contradicts the established guidelines.

Given the above stated information, I'd like to request both syncope and SIRVA remain on the VIT and no consideration of a change (removal) of these be considered.

Sincerely,

Kerri Pastrano



Virus-free. www.avast.com