

To: The National Vaccine Advisory Committee (NVAC) Vaccine Safety Working Group

From: The Interagency Autism Coordinating Committee

Re: IACC Public Comment on the NVAC Vaccine Safety Working Group Scientific Agenda

The Interagency Autism Coordinating Committee (IACC) appreciates the opportunity to comment on the NVAC Vaccine Safety Working Group Scientific Agenda. The IACC has been established in accordance with the Combating Autism Act of 2006 (P.L. 109-416), and is governed by the provisions of the Federal Advisory Committee Act. The IACC coordinates all efforts within the Department of Health and Human Services (HHS) concerning autism spectrum disorder (ASD). One of the purposes of the IACC is to facilitate the efficient and effective exchange of information on ASD activities among the member agencies and public members. As a part of its charter; the IACC develops and annually updates a strategic plan for the conduct of, and support for, ASD research, including proposed budgetary requirements.

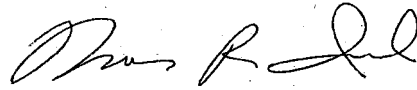
Following the release of the IACC draft strategic plan for ASP research for public comment in August 2008 the Committee received 148 responses that reflected, among other topics, differing views on the potential role of vaccines as a contributing factor for ASD. Some are convinced by current data that vaccines do not play a causal role and argue against conducting further research when many other potential environmental factors remain to be explored, Others believe that prior studies of the possible role of vaccines in ASD have been insufficient and argue that investigation of a possible vaccine/ASD link should be a high priority for research. A third view urges shifting focus away from vaccines and onto much-needed attention toward the development of effective treatments, services and supports for those with ASD.

In order to address public concerns regarding a possible vaccine/ASD link, it will be important for the IACC to engage the National Vaccine Advisory Committee (NVAC) in a mutually informative dialogue. While the IACC roster comprises experts in various areas of ASD research, it needs to solicit additional expertise in the area of vaccine safety. The IACC has invited Bruce G. Gellin, M.D., M.P.H., Director of the National Vaccine Program Office, Office of the Assistant Secretary of Health, to speak to the committee about the NVAC'S activities. The NVAC comprises experts in vaccine safety; however, it may not be attuned to the specific concerns and issues raised by people and families affected by ASD.

Communication between the IACC and NVAC will permit each group to be informed by the expertise of the other, enhance coordination and foster more effective use of research resources on topics of mutual interest. Examples of such topics include: studies of the possible role of vaccines, vaccine components, and multiple vaccine administration in ASD causation, and severity through a variety of approaches; assessing the feasibility and design of an epidemiological study to determine whether health outcomes, including ASD, differ among populations with vaccinated, unvaccinated, and alternatively vaccinated groups; and investigating the reasons as to why some sub-groups may be a higher risk for vaccine injury and how to identify such risk factors.

Thank you again for the opportunity to submit comments to the NVAC Vaccine Safety Working Group. The IACC looks forward to the opportunity for collaboration and greater coordination between the two committees.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Insel". The signature is fluid and cursive, with a large initial "T" and a long, sweeping underline.

Thomas Insel, M.D.  
Chair, IACC  
Director, National Institute of Mental Health, NIH