

**Report of the World Trade Center Scientific/Technical Advisory Committee's
Workgroup on Policies and Procedures to Add Conditions**

October 5, 2016

The workgroup is concerned that the proposed procedures for the WTC Health Program Administrator's response to a petition to add a condition to the List of WTC-Related Health Conditions include public comment and peer review only if the decision is made that the condition should be added and a notice of proposed rulemaking is published in the Federal Register. We believe that the most important time for the Administrator to receive scientific and stakeholder input is before he or she determines if the evidence is sufficient to propose to add the health condition to the list of WTC-related conditions. We recognize that the constraints of the timeline required for the Administrator's decision in the Zadroga Act would make it difficult, if not impossible, to obtain public comment and peer review before the decision.

The workgroup suggests that the Administrator consider the following opportunities to expand the scope of scientific input into the process of petition review:

1. The NIOSH Science team should include experts with a range of relevant expertise, including, at a minimum, clinical medicine, epidemiology, exposure assessment, and industrial hygiene. These are the core disciplines that are needed to address elements of the specified policy and procedures for adding conditions to the list of WTC-related health conditions, including biological gradient, plausibility, coherence and exposure qualifications. If possible, NIOSH should also consider creating an ad hoc team of discipline-specific experts, external or internal to NIOSH, that can readily assist the NIOSH Science team in the review of additional proposed conditions, including psychiatry, cardiology, rheumatology, and others if needed.
2. The program should consider whether the mechanism of a STAC teleconference or other mechanism could be used to solicit external comments when a petition is likely to advance to the WTCHP Science Team assessment phase. We see this as distinct from a formal request by the Administrator for the STAC to make a recommendation on a petition but rather as a mechanism to allow opportunity for public comment and benefit from the scientific expertise and knowledge base of the STAC.
3. The Policy and Procedures for Non-Cancer Conditions describes three potential phases of the NIOSH Science team review of scientific evidence: 1) initial review (p. 2); 2) a fuller assessment (p. 3-4); and 3) if "modest support" is found, a supplemental assessment of additional scientific literature (p. 5). This supplemental assessment is limited to epidemiologic studies of 9/11 agents with special emphasis on the relevance of exposure conditions. It would be important to give the NIOSH Science team some flexibility in the range of scientific studies they review by adding at the end of Section IV.B.1.d. (p. 5, line 9) the phrase "and additional knowledge based on peer-reviewed scientific studies that they deem highly relevant."