RevComment on 42
CFR Part 82.d...

Please see attached file. Thank you.

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Claimants filing for compensation under the EEOICPA consist of persons with potentially fatal cancers. When faced with this type of knowledge, most persons respond with feelings related to two questions: 1) why me?, and 2) how long do I have left before I die? A common human response when a person is confronted with cancer is to look for someone or something to blame for their condition, since clearly they deserve better. In short, these individuals may require counseling that addresses their feelings and fears as much their need to understand the technical aspects of the dose reconstruction and probability of causation process. Most importantly, they will need counseling that helps them address their emotions associated with becoming stricken with cancer and whether their disease is related to occupational radiation exposure.

These needs will not be met under the protocols described in the interim final rule, which call for an average 60-minute initial interview and 5-minute closing interview.