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January 22, 2015

Tiffany Suragh
Centers for Disease Control and Prevention
National Center for Emerging and Zoonotic Infectious Diseases
Division of Healthcare Quality Promotion
Immunization Safety Office
Attn: VAERS 2.0 form Docket No. CDC– 2014–0015
1600 Clifton Rd. NE., Mailstop A–07
Atlanta, GA 30333

Re: Draft Vaccines Adverse Event Reporting System 2.0; Docket Number: CDC–2014–0015

Dear Ms. Suragh:

The American Nurses Association (ANA) welcomes the opportunity to provide comments on the draft document, *Vaccines Adverse Event Reporting System (VAERS) 2.0*. As the only full-service professional organization representing the interests of the nation’s 3.1 million registered nurses (RNs), ANA is privileged to speak on behalf of its state and constituent member associations, organizational affiliates, and individual members. RNs serve in multiple direct care, care coordination, and administrative leadership roles, across the full spectrum of health care settings. ANA members also include advanced practice registered nurses (APRNs) such as nurse practitioners, certified registered nurse anesthetists, clinical nurse specialists, and certified nurse-midwives.

We applaud the efforts of the Centers for Disease Control and Prevention to revise the *VAERS* form, including the numerous changes that use more inclusive language when referencing and describing the clinicians who provide care to patients. These changes more accurately reflect the range of clinicians who may be providing care and services to patients.

We do recommend several additional changes related to this issue. Box 14 refers to “doctor or health care professional.” Similarly, box 21 refers to “Doctor or other healthcare professional office/clinic visit.” In addition, box 16 of the form includes an option to designate that the vaccine was administered in a “Doctor’s office or hospital.” We recommend referring to “Physician and health care provider” (in boxes 14 and 21), rather than doctor, to more accurately identify the type of provider referenced. With regard to box 16, we suggest changing the language to “Clinician’s office” or to “Health care provider’s office” (rather than doctor’s office).

Box 16 currently lists “doctor’s office and hospital” in the same category. From a data-collection perspective, we believe it may be helpful to include separate options for these two locations. Finally, box 16 of the form now includes a new option to designate that the vaccine was administered in a

American Nurses Association

January 22, 2015

Page Two

“pharmacy or drug store.” This is an important new option, as it will assist in identifying and quantifying the growing trend of providing vaccines in this setting. We recommend, however, expanding this option to include a reference to retail clinics/convenient care clinics, some of which are located apart from a pharmacy or drug store.

We appreciate the opportunity to share our views on this matter. If you have questions, please contact Cheryl Peterson, Senior Director Nursing Programs (Cheryl.Peterson@ana.org or 301-628-5089).

Sincerely,



Debbie D. Hatmaker, PhD, RN, FAAN
Executive Director

cc: Pamela Cipriano, PhD, RN, NEA-BC, FAAN, ANA President
Marla Weston, PhD, RN, FAAN, ANA Chief Executive Officer