

June 8, 2018

National Vaccine Advisory Committee  
National Vaccine Program Office  
U.S. Department of Health & Human Services  
200 Independence Avenue SW, Room 715-H  
Washington, D.C. 20201

**Attention: Draft Document for Human Papillomavirus (HPV) Vaccination Implementation Work Group Public Comment**

Dear National Vaccine Advisory Committee,

On behalf of the National Association of County and City Health Officials (NACCHO), I am writing to provide comment on the National Vaccine Advisory Committee (NVAC) draft report, “Overcoming Barriers to Low HPV Vaccine Uptake in the United States: Recommendations from the National Vaccine Advisory Committee,” developed by the NVAC HPV Vaccination Implementation Work Group. NACCHO is the voice for nearly 3,000 local health departments (LHDs) across the country. These city, county, metropolitan, district, rural, and tribal departments work daily to ensure that communities have access to vital public health programs and services such as immunizations. NACCHO appreciates the opportunity to comment and provide a local health department perspective regarding the proposed draft document.

Immunization has been one of the most successful and safest public health measures available to populations worldwide, with an unparalleled record of disease reduction and prevention. NACCHO commends NVAC for the recognition regarding the importance and impact of HPV vaccination on public health and supports the HPV Work Group in their efforts to identify recommendations to address the charge of the Assistant Secretary for Health (ASH). While NACCHO agrees that substantial progress has been made towards increasing HPV coverage through the establishment and implementation of HPV vaccine recommendations by the Advisory Committee Immunization Practices (ACIP), Centers for Disease Control and Prevention (CDC), and other professional organizations, HPV vaccination coverage rates remain significantly low and fall short of the Healthy People 2020 target of 80% for both males and females.<sup>1</sup>

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<sup>1</sup> Department of Health and Human Services. Healthy People 2020 webpage. Retrieved June 7, 2018, from <http://www.healthypeople.gov/2020/topics-objectives/topic/immunization-and-infectious-diseases>



NACCHO supports the focus areas within this report and encourages the NVAC HPV Vaccination Implementation Work Group to broaden recommendations that reflect engaging with LHDs or Local Health Officials in addition to State Health Officials, as many directly funded cities and LHDs have proven to be key immunization leaders as it relates to partnerships with coalitions, engagement with health systems, and utilization of Immunization Information Systems (IIS) and AFIX visits reflected in the recommendations for Focus Areas 2.1, 3.1, and 3.3. According to NACCHO's 2016 National Profile of Local Health Department Immunization Programs, 88% of LHDs reported providing immunization services for children.<sup>2</sup> As such, LHDs are key stakeholders worth engaging in efforts to increase HPV vaccination rates. As it relates to the charge of ASH, the continued coordinated state and local efforts should be considered to improve HPV vaccination coverage rates and address disparities in HPV vaccination coverage.

Similarly, NACCHO supports maximizing immunization opportunities and strengthening IIS as indicated in Focus Area 3.2 and would suggest ensuring that these recommendations encourage sustainable financing and accounting for onboarding new users for IIS. Finally, NACCHO strongly supports Focus Areas 4.1-4.3. NACCHO has recently developed a Rural Health Section that will focus on improved information and data use for decision making, improved workforce capacity, and improved health system governance and finance. NACCHO seeks to support the rural health department's role as strategist to strengthen performance and management of their health system, increasing access to high quality and essential health services to ensure better health outcomes and improved population health status.

NACCHO supports strong coordination, collaboration, and communication among public health, healthcare providers, parents and caregivers, and community partners at the local, regional, state, and federal levels to increase HPV vaccination coverage in adolescents and young adults according to the recommendations of ACIP. Therefore, NACCHO appreciates the opportunity to provide comments on this NVAC draft report informed by the HPV Vaccination Implementation Working Group. If you have any questions, please contact Michelle Cantu, Director for Infectious Disease and Immunization, at 202-507-4251 or [mcantu@naccho.org](mailto:mcantu@naccho.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Lori Tremmel Freeman". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Lori Tremmel Freeman, MBA  
Chief Executive Officer

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<sup>2</sup> National Association of County and City Health Officials. (2016). Immunization at NACCHO: Reinforcing the Power of Vaccination to Protect Public Health. <https://www.naccho.org/uploads/downloadable-resources/factsheet-immunizationprogram-june2018.pdf>. Accessed June 7, 2018