



AMERICAN ACADEMY OF  
FAMILY PHYSICIANS  
STRONG MEDICINE FOR AMERICA

October 11, 2010

Mr. Don Wright  
Deputy Assistant Secretary for Healthcare Quality  
Department of Health and Human Services  
200 Independence Ave, SW., Room 719B  
Washington, DC 20201

RE: Draft Tier 2 Modules

Dear Deputy Assistant Secretary Wright:

On behalf of the American Academy of Family Physicians (AAFP), which represents more than 94,700 family physicians and medical students nationwide, I am writing to offer our comments on the Draft Tier 2 strategies for inclusion in the "HHS Action Plan to Prevent Healthcare-Associated Infections," as published in the September 23, 2010 Federal Register. Specifically, our comments focus on the influenza vaccination of healthcare personnel module.

Influenza is a serious disease and vaccination is the first and most important step that physicians, healthcare workers and vulnerable patients can take to protect against the flu. Studies conducted in healthcare settings show that when healthcare workers are vaccinated, vulnerable patients are protected. Since influenza can spread rapidly in healthcare settings, AAFP supports the goal of increasing the rate of healthcare personnel influenza immunizations. To that end, AAFP encourages all healthcare facilities to offer influenza vaccinations to all personnel. The Academy believes particular emphasis should be placed on providing vaccinations to workers who provide direct care for persons at high risk for influenza complications. Efforts should be made to educate healthcare personnel regarding the benefits of vaccination and the potential health consequences of influenza illness for their patients, themselves and their family members.

The American Academy of Family Physicians recommends expanding the seasonal influenza immunization to include all adults beginning in the 2010-11 influenza season. We now urge that all people aged 6 months and older receive the annual influenza vaccination. This recommendation is consistent with that of the Advisory Committee on Immunization Practices, which advises the Centers for Disease Control and Prevention (CDC) on immunizations. However, the Academy currently does not have policy suggesting that vaccinations for healthcare personnel should be required.

[www.aafp.org](http://www.aafp.org)

**President**

Lori J. Heim, MD  
Vass, NC

**President-elect**

Roland A. Goertz, MD  
Waco, TX

**Board Chair**

Ted Epperly, MD  
Boise, ID

**Directors**

Kenneth R. Bertka, MD, *Holland, OH*  
David A. Ellington, MD, *Lexington, VA*  
Glen R. Stream, MD, *Spokane, WA*  
Jeffrey J. Cain, MD, *Denver, CO*  
Thomas Allen Felger, MD, *Granger, IN*  
George Wm. Shannon, MD, *Columbus, GA*

Reid Blackwelder, MD, *Kingsport, TN*  
Conrad L. Flick, MD, *Raleigh, NC*  
Laura Knobel, MD, *Walpole, MA*  
Chris P. Lupold, MD, (New Physician Member), *Lancaster, PA*  
Robert J. Stenger, MD, MPH (Resident Member), *Portland, OR*  
Brooke Sciuto (Student Member), *Mountain Top, PA*

**Speaker**

Leah Raye Mabry, MD  
San Antonio, TX

**Vice Speaker**

John S. Meigs, Jr., MD  
Brent, AL

**Executive Vice President**

Douglas E. Henley, MD  
Leawood, KS

Although it is clear that influenza immunizations rates for healthcare personnel should increase nationally, AAFP remains concerned that the results of this well-intended goal do not sufficiently take into consideration the unintended payment burdens and employment legalities for individual physician's practices. Nevertheless, AAFP will continue educating our members and the patients they treat about the prevention and control of seasonal influenza with vaccines using recommendations consistent with that of the Advisory Committee on Immunization Practices, which recommends clearly that all healthcare workers should be immunized.

Thank you for this opportunity to comment on this matter. If we may be of further assistance, please contact Robert Bennett at [rbennett@aafp.org](mailto:rbennett@aafp.org).

Sincerely,

A handwritten signature in cursive script that reads "Lori Heim". The signature is written in black ink and is positioned to the right of the word "Sincerely,".

Lori J. Heim, MD, FAAFP  
Board Chair