



June 13, 2018

Captain Angela Shen, Designated Federal Officer
National Vaccine Program Office
U.S. Department of Health and Human Services
Hubert H. Humphrey Building, Room 715H
200 Independence Avenue SW
Washington, DC 20201

Dear Captain Shen:

On behalf of the American Academy of Family Physicians (AAFP), which represents 131,400 family physicians and medical students across the country, I write in response to the [solicitation for comments](#) on the Human Papillomavirus Vaccination Implementation Work Group Draft Report and Draft Recommendations as published by the National Vaccine Program Office in the May 31, 2018 *Federal Register*.

The AAFP appreciates that HHS charged the National Vaccine Advisory Committee to establish a work group to produce a draft report on recommendations to strengthen the effectiveness of national, state, and local efforts to improve Human Papillomavirus (HPV) coverage rates. Despite overwhelming evidence of the safety and effectiveness of the HPV vaccine, vaccination rates remain low. The AAFP urges physicians to strongly recommend the HPV vaccine to their patients. The currently available HPV vaccine is the 9-valent human papillomavirus (9vHPV) vaccine. This vaccine protects against the most common HPV types, which cause 90% of cervical, vaginal, vulvar, anal, and penile cancers. Additionally, this vaccine prevents HPV types that cause genital warts in both males and females.

Given this, we share HHS's goal of improving HPV coverage rates and it is the AAFP's policy on [immunizations](#) to endorse the concept that all children and adults, regardless of economic and insurance status, should have access to all immunizations recommended by the AAFP. Furthermore, it is our position that all public and private insurers should include, as a covered benefit, immunizations recommended by the AAFP without co-payments or deductibles.

In Focus Area 4 of the [draft report](#) regarding "the needs of providers in rural areas", the AAFP is concerned that the associated recommendations assume that all physicians already have a sound knowledge base and are recommending the vaccine, but ineffectively. We believe more HPV education and an increase in knowledge base regarding the vaccine and HPV-related cancers is necessary for physicians and healthcare professionals and should be offered in addition to the communication skills to recommend the vaccine.

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We appreciate the opportunity to provide these comments. Please contact Robert Bennett, Federal Regulatory Manager, at 202-232-9033 or rbennett@aafp.org with any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "John Meigs, Jr.", with a stylized flourish at the end. The initials "JMS" are written in small letters at the bottom right of the signature.

John Meigs, Jr., MD, FAFBP
Board Chair

About Family Medicine

Family physicians conduct approximately one in five of the total medical office visits in the United States per year – more than any other specialty. Family physicians provide comprehensive, evidence-based, and cost-effective care dedicated to improving the health of patients, families and communities. Family medicine's cornerstone is an ongoing and personal patient-physician relationship where the family physician serves as the hub of each patient's integrated care team. More Americans depend on family physicians than on any other medical specialty.