

healthy women

October 18, 2024

Melinda Wharton, MD, MPH
Associate Director for Vaccine Policy
Executive Secretary of the Advisory Committee on Immunization Practices
National Center for Immunization and Respiratory Diseases, CDC

Re: Request to Prioritize Updating the ACIP Recommendation for Routine HPV Vaccination to Age 9

Dear Dr. Wharton,

HealthyWomen and the members of its HPV Coalition are writing to thank the Advisory Committee on Immunization Practices (ACIP) for re-establishing the HPV Vaccines Work Group and to request that the Work Group and Committee prioritize updating the ACIP recommendation for routine HPV vaccination to include initiation at age 9. The HealthyWomen HPV Coalition consists of over 50 health and advocacy stakeholder organizations that work together to increase HPV vaccination to prevent HPV cancers, promote early detection through essential screenings, and highlight the need for early treatment of HPV cancers.

Each year, approximately 13 million Americans are infected with the human papillomavirus (HPV), and over 36,000 individuals develop HPV cancers.¹ Fortunately, HPV vaccination has proven to be more than 90% effective at preventing the six cancers caused by HPV and can help us realize the goal of eliminating cervical cancer and potentially other HPV-related cancers in the U.S.² However, since the ACIP began recommending HPV vaccination in 2006, uptake rates have been suboptimal and have stagnated since the COVID-19 pandemic.³ The CDC reported evidence of this stagnation in its August 22, 2024, *Morbidity and Mortality Weekly Report*, which noted that 76.8% of adolescents 13-17 years old

¹ "About HPV." *Centers for Disease Control and Prevention*, Centers for Disease Control and Prevention, 3 July 2024, www.cdc.gov/hpv/about/index.html#:~:text=HPV%20infections%20are%20very%20common,teens%2C%20become%20infected%20each%20year.

² "Cancers Caused by HPV." *Centers for Disease Control and Prevention*, Centers for Disease Control and Prevention, 3 July 2024, <https://www.cdc.gov/hpv/about/cancers-caused-by-hpv.html#:~:text=Recommendations-,HPV%20vaccination%20can%20prevent%20over%2090%25%20of%20cancers%20caused%20by,contact%20with%20the%20HPV%20virus>.

³ Pingali C, Yankey D, Chen M, et al. National Vaccination Coverage Among Adolescents Aged 13–17 Years — National Immunization Survey-Teen, United States, 2023. *MMWR Morb Mortal Wkly Rep* 2024;73:708–714. DOI: <http://dx.doi.org/10.15585/mmwr.mm7333a1>

had received at least one dose in 2023 compared to 76.0% in 2022. Meanwhile, 61.4% were up to date on the vaccine in 2023, compared to 62.6% in 2022.⁴

Currently, ACIP recommends HPV vaccination for adolescents be initiated at age 11 or 12, with the option for initiation as early as age 9. On behalf of the countless constituencies our organizations represent, we strongly encourage the HPV Vaccines Work Group to recommend that the ACIP harmonize its routine HPV vaccine recommendations with leaders in public health, cancer prevention, and childhood and adolescent health — including the American Cancer Society (ACS) and the American Academy of Pediatrics (AAP) — by updating the routine recommendation for HPV vaccination to begin at age 9.

Initiating the HPV vaccine series at age 9 has proven to be an effective approach to addressing suboptimal vaccination rates in the U.S., with evidence demonstrating the impact on vaccination uptake. Earlier initiation of HPV vaccination among children is associated with several implementation benefits, such as increasing the likelihood that children and adolescents will be vaccinated before their first exposure to HPV.⁵ Evidence suggests that initiating HPV vaccination before age 11 or 12 may also increase the chances of series completion by age 13, giving patients more time to get vaccinated.⁶

Harmonizing the recommendation from ACIP, ACS, and AAP will also help streamline educational, awareness and administrative updates across health systems, payers, providers, and parents and caregivers.⁷ ACIP recommendations are directly tied to health insurance coverage and patient out-of-pocket cost-sharing. Inconsistent recommendations can lead to additional cost barriers and administrative challenges that can discourage vaccination, resulting in missed opportunities to prevent HPV cancers.

Updating the ACIP recommendation for routine HPV vaccination to begin at age 9 is critical to advancing our shared goal of preventing HPV cancers and eliminating cervical cancer in the U.S. Thank you for the opportunity to provide comments on the HPV Vaccines Work Group's recommendation for routine vaccination in the adolescent population. We appreciate the ACIP's ongoing work to protect our nation's health through the development of public health guidance for the safe use of vaccines in the U.S.

Sincerely,

HealthyWomen

⁴ Pingali C, Yankey D, Chen M, et al. National Vaccination Coverage Among Adolescents Aged 13–17 Years — National Immunization Survey-Teen, United States, 2023. *MMWR Morb Mortal Wkly Rep* 2024;73:708–714. DOI: <http://dx.doi.org/10.15585/mmwr.mm7333a1>

⁵ O'Leary, Sonja C, and Holly M Frost. "Does HPV vaccination initiation at age 9, improve HPV initiation and vaccine series completion rates by age 13?." *Human vaccines & immunotherapeutics* vol. 19,1 (2023): 2180971. doi:10.1080/21645515.2023.2180971

⁶ O'Leary, Sonja C, and Holly M Frost. "Does HPV vaccination initiation at age 9, improve HPV initiation and vaccine series completion rates by age 13?." *Human vaccines & immunotherapeutics* vol. 19,1 (2023): 2180971. doi:10.1080/21645515.2023.2180971

⁷ Perkins, Rebecca B et al. "Evidence supporting the initiation of HPV vaccination starting at age 9: Collection overview." *Human vaccines & immunotherapeutics* vol. 19,3 (2023): 2269026. doi:10.1080/21645515.2023.2269026

Academy of Managed Care Pharmacy (AMCP)
Alliance for a Healthier Generation
Alliance for Immunization in Michigan
Alliance for Women's Health and Prevention
American Association of Nurse Practitioners
(AANP)
American Medical Women's Association
(AMWA)
American Sexual Health Association (ASHA)
Black Women's Health Imperative
Byrd Cancer Education and Advocacy
Foundation
CancerCare
Cervivor
Friends of Cancer Research
Global Initiative Against HPV and Cervical
Cancer
Hager Sharp
Head & Neck Cancer Alliance
Healthy Men Inc.
HPV Cancers Alliance
HPVANDME
Immunize Colorado
Indiana Immunization Coalition
Immunize Kentucky Coalition
ITAV Foundation
Journi For Two
Kelsey-Seybold Clinic
Kentucky Rural Health Association

Louisiana Families for Vaccines
Men's Health Network
Miami Cancer Institute
Moffitt Cancer Center
National Association of Nurse Practitioners In
Women's Health (NPWH)
National Association of Pediatric Nurse
Practitioners/National League for Nursing
National Caucus and Center on Black Aging
National Consumers League
National Grange
National Women's Health Network
Nurses Who Vaccinate
Oncology Nursing Society
Prevent Cancer Foundation
Society for Women's Health Research
St. Jude Children's Research Hospital
STChealth
Team Maureen
Tennessee Families for Vaccines
The American Cancer Society Cancer Action
Network
The Anal Cancer Foundation
The Balm In Gilead, Inc.
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Vaccinate Your Family
VAX 2 STOP CANCER
Voices for Vaccines

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