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Executive Committee

October 5, 2005

Jon Abramson, MD
Chairman of ACIP
Weston M. Kelsey Professor & Chair
Department of Pediatrics
Wake Forest University School of Medicine
Medical Center Boulevard
Winston Salem, North Carolina 27157

Larry Pickering, MD
Executive Secretary for ACIP
National Immunization Program
Centers for Disease Control and Prevention
1600 Clifton Road, NE, MS E-05
Atlanta, GA 30333

Dear Drs. Abramson and Pickering,

On behalf of the National Alliance of State and Territorial AIDS Directors (NASTAD), whose members are responsible for administering state HIV/AIDS programs nationwide, we are writing to express our concern that a final vote has been scheduled on the draft *Recommendations for Adult Hepatitis B Vaccination* during the upcoming meeting of the Advisory Committee on Immunization Practices (ACIP). The public has not yet been given an opportunity to review the current version of this document, and as a result have been unable to provide comments. The ACIP meeting agenda, as of September 29, indicates there will be a discussion and decision on the draft recommendations on October 26. We request that a final vote be delayed unless there is sufficient opportunity to view the revised recommendations prior to the meeting.

NASTAD members are increasingly responsible for developing and implementing viral hepatitis prevention programs, of which the vaccination of high risk adults against hepatitis B is a critical component. We greatly appreciated the opportunity to provide comments on the draft recommendations in February of this year, but are concerned that a revised draft was not disseminated. Without access to the draft recommendations,

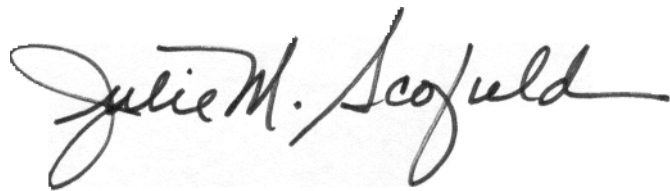
we are unable to provide comment for the Committee's consideration prior to its voting on the recommendations. Further, the public comment period on the ACIP meeting agenda follows the adult hepatitis B decision – allowing no opportunity for the public to respond to the draft recommendations prior to the vote.

This ACIP decision will become guiding public health policy in the U.S., perhaps for decades to come. It is the first major change in adult hepatitis B recommendations since 1991, and arguably the most important – as a significant cohort of unvaccinated adults who have not benefited from childhood immunization remain susceptible to this disease.

As the public health officials largely responsible for overseeing programs charged with implementing the hepatitis B immunization recommendations in high risk settings, we believe that we should be given adequate time to review and respond to the draft recommendations. To date, the vaccination of high risk adults against hepatitis B represents a failure of public health. The vaccination of adult Katrina victims against hepatitis B on an emergency basis is a case in point. This decision requires careful consideration, dialogue and honest involvement by stakeholders to ensure that this time we are successful.

Thank you for your consideration of this request.

Sincerely,

A handwritten signature in black ink that reads "Julie M. Scofield". The signature is fluid and cursive, with the first letters of each name being capitalized and prominent.

Julie M. Scofield
Executive Director

cc: Michael O. Leavitt, HHS
Julie Gerberding, CDC
Mitchell L. Cohen, NCID
John W. Ward, DVH
Eric Mast, DVH
Dee Gardner, NIP
Richard Conlon, NVHR