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M I G R A N T C L I N I C I A N S N E T W O R K

June 16, 2005

Larry Pickering, MD,  
Executive Secretary for ACIP  
National Immunization Program/CDC  
1600 Clifton Road, NE, Atlanta, GA 30333

Dear Dr. Pickering:

On behalf of the Migrant Clinicians Network (MCN), I would like to provide comments on the Advisory Committee on Immunization Practices (ACIP) draft statement of hepatitis B immunization. On behalf of clinicians serving mobile populations in Community and Migrant Health Centers and local health departments nationwide, thank you for your attention and updates to the hepatitis B immunization policy recommendations.

**As clinicians (physicians, physicians assistants, nurse practitioners, certified nurse midwives, RNs, etc.) working with clients who are both indigent and mobile, and often recent immigrants, we would like to urge the ACIP to make the hepatitis B vaccination recommendation universal and age-based for adults, as it is for adolescents and children.**

Our clients do not establish a medical home, because they move frequently for work and other purposes. Clinicians, while very skilled and committed, are not able to address the many needs of each client and establish the relationship necessary to perform a thorough sexual risk assessment. In addition, many migrant workers are young men, who rarely present at clinics for preventive care. We would like to quickly and efficiently protect these young men from hepatitis B, without--the admittedly best case scenario of--being able to conduct a thorough and accurate sexual history and risk assessment with each of them. The idea that an 18-year old young man traveling and working in the US would need a vaccination, but a 19-year-old would only need one if we established that he has had more than one sexual partner in the past six months and will only have one in the next six months, is clearly not based on public health best practices.

Basing the need for hepatitis B vaccination on sexual risk also perpetuates the stigma around hepatitis, rather than promoting the necessity of current vaccinations as routine preventive health care.

**An age-based adult immunization recommendation for hepatitis B will ensure that more at-risk adults are immunized. It will enable clinicians serving the populations most in need of preventive health care services to provide them with fewer barriers. And an age-based recommendation, though it would clearly present funding issues, would be a time-limited expense, because soon young adults we see in our clinics will have been covered by universal hepatitis B pediatric immunizations (also now in place in Mexico and many Latin American countries).**

Thank you for taking into account the health needs of the most needy and the practice needs of the clinicians that serve them as you make your influential recommendations.

Sincerely,



Edward L. Zuroweste, M.D.  
Medical Director  
Migrant Clinicians Network

cc: Myron J. Levin, MD,  
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