



August 10, 2009

Thomas R. Frieden, MD, MPH
Acting Director
Centers for Disease Control and Prevention (CDC)
1600 Clifton Road
Atlanta, GA 30333

RE: HPV Vaccination Mandate for Immigrant Women and Girls

Dear Dr. Frieden:

The undersigned, over 140 immigrants' rights, women's rights, public health, medical, and reproductive justice organizations write to urge the CDC to act quickly and finalize the proposed criteria for identifying Advisory Committee on Immunization Practices (ACIP) recommended vaccines as immunization requirements for immigrants.

As you know, ACIP recommended in 2007 that Gardasil, the only FDA-approved human papillomavirus (HPV) vaccine, be administered to females ages 11 to 26 in the U.S. This recommendation became an automatic requirement for prospective immigrants when the government updated its vaccination list in July 2008, mandating that female immigrants ages 11 to 26 seeking permanent residence or entry to the U.S. be immunized against HPV. In the enclosed January 26th letter to Dr. Besser, we outlined our concerns about the HPV vaccination mandate on immigrants and urged the CDC to retract its listing of HPV as a required vaccination for immigrants in the revised Technical Instructions to the Civil Surgeons for Vaccinations Requirements, and to direct ACIP to modify its recommendation to state that the HPV vaccination should not be mandated for immigrants.

At the February 25-26, 2009 ACIP meeting, the Division of Global Migration and Quarantine (DGMQ) proposed a set of criteria for identifying ACIP-recommended vaccines as immunization requirements for immigrants, which was published in the Federal Registrar on April 8, 2009 for comment. We are greatly encouraged that the CDC has responded to public concerns by proposing the criteria and we submitted comments in support of the proposed rule, however, it has been months since the public comment period closed and the rule has not yet been finalized. In the meantime, advocates continue to receive stories and concerns from those adversely affected by this mandate. In one of the many emails received, one woman wrote:

“... I have been raising my grand-daughter since she was 20 months old and was abandoned by her mother. To cut a long story short on how we came to be alone in the US etc. I will just say we were in very difficult circumstances and in the care of the Domestic Violence unit...

In July 2008 I sent all the paperwork and fees to apply for change of status/permanent residence for her. She was 16 years old. After the finger print [sic] appointment we were told to get the medical exam. The appointment came for August and that is when we found out about the HPV vaccination requirement.

I did some research and couldn't understand why it had been made a requirement for immigrants ... I sent all the paper work in to the USCIS and said that my grand-daughter doesn't want to have that vaccination. Today, almost a year later, I have received notice that they have determined she is inadmissible to the United States without it... [but] we can file the I-601 waiver with the fee!

I am a single person, 62 years old working for \$13,000 per year supporting myself and my adopted daughter and think it is ridiculous to have to pay another nearly \$600 on top of the \$1,700 I have already paid to do things the legal and correct way.¹”

We urge you to act immediately to finalize the rule and begin the process of correcting this egregious mandate.

Thank you for your consideration. We welcome the opportunity for further communication on this issue. Please contact Priscilla Huang at phuang@napawf.org, or (301) 270-4440, with questions or concerns.

Sincerely,

International Organizations

International Women's Health Coalition
Our Bodies Ourselves

National Organizations

Advocates for Youth
American Families United
American Immigration Lawyers Association
American Medical Student Association
American Social Health Association
Americans for Democratic Action
Asian American Justice Center
Asian & Pacific Islander American Health Forum
Black Alliance for Just Immigration
Black Women's Health Imperative
Boat People SOS, Inc.
Center for Human Rights and Constitutional Law
Center for Reproductive Rights

¹ Email has been edited for brevity.

Center for Women Policy Studies
Choice USA
Church World Service, Immigration and Refugee Program
Community HIV/AIDS Mobilization Project (CHAMP)
Gynecological Cancer Foundation
Ibis Reproductive Health
Law Students for Reproductive Justice
Legal Momentum
Migrant Health Promotion
National Advocates for Pregnant Women
Native American Women's Health Education Resource Center
National Asian American Pacific Islander Mental Health Association
National Asian Pacific American Families Against Substance Abuse
National Asian Pacific American Women's Forum (NAPAWF)
National Association of Nurse Practitioners in Women's Health
National Coalition of STD Directors (NCSDD)
National Council of Jewish Women
National Council of La Raza
National Health Law Program
National Immigration Law Center
National Institute for Reproductive Health
National Korean American Service & Education Consortium (NAKASEC)
National Latina Institute for Reproductive Health
National Network for Immigrant and Refugee Rights
National Network of Abortion Funds
National Organization for Women
Nonviolent Choice Directory
National Partnership for Women & Families
National Women's Health Network
OCA Embracing the Hopes and Aspirations of Asian Pacific Americans
Physicians for Reproductive Choice and Health
Planned Parenthood Federation of America
Pro-Choice Public Education Project (PEP)
Project PAP (Prevention Awareness Program) National Group
Quirky Black Girls
Reproductive Health Technologies Project
SisterSong Women of Color Reproductive Health Collective
South Asian Americans Leading Together
Southeast Asia Resource Action Center (SEARAC)
The American College of Obstetricians and Gynecologists
The MergerWatch Project
The Praxis Project
United Methodist Church, General Board of Church and Society
Women of Color Resource Center

State/Local Organizations

ACCESS/Women's Health Rights Coalition
Act for Women and Girls
African Services Committee
American Friends Service Committee, Philadelphia, Pa
Asian American Institute
Asian Law Caucus
Asian Pacific American Legal Center of Southern California
BARCA, Inc.
Biotechnology and Pharmaceutical Law Institute, North Carolina Central University School of Law
California Academy of Family Physicians
California Family Health Council, Inc.
California National Organization for Women
California Primary Care Association
Chicago Abortion Fund
Chicago Women's Health Center
Coloradans For Immigrant Rights, a project of the American Friends Service Committee, Denver, Colorado
Colorado National Organization for Women
Colorado Organization for Latina Opportunity & Reproductive Rights (COLOR)
Daya, Inc. (Texas)
Desis Rising Up and Moving (DRUM) (New York City)
Different Avenues
Entre Nosotras Foundation
Farmworker Legal Services of NY, Inc.
Feminist Women's Health Center of California
Florida Coastal School of Law Immigrants Rights Clinic
HPV Awareness
Human Rights Initiative of North Texas, Inc.
Illinois Caucus for Adolescent Health (ICAH)
Immigrant & Refugee Rights Clinic, CUNY School of Law
Immigrant Legal Advocacy Project
Immigrant Rights Project, Boesche Legal Clinic, University of Tulsa College of Law
Immigration Services, Catholic Charities, Archdiocese of Atlanta
Indo-American Center (Illinois)
Jacksonville Area Legal Aid, Refugee Immigration Project
Justice Now
Just Neighbors
Kentucky Health Justice Network
Korean American Resource & Cultural Center (KRCC), Chicago, IL
Korean Resource Center (KRC), Los Angeles, CA
Law Office of Jacqueline Tapia
LUZ Reproductive Justice Think Tank, Denver, Colorado
Miami International Latinas Organizing for Leadership and Advocacy (MI-LOLA)
Michigan Asian Indian Family Services (Michigan)
Mitch Factors Innovation in Health & Wellness
Mujeres Latinas en Accion
NARAL Pro-Choice Massachusetts

NARAL Pro-Choice New York
NARAL Pro-Choice Oregon
Narika
National Organization for Women - Monterey Peninsula Chapter
Nationalities Service Center
New Voices Pittsburgh: Women of Color for Reproductive Justice
New York City Latina Advocacy Network
New York Immigration Coalition
Northwest Immigrant Rights Project
Northwest Women's Law Center
Pinay sa Seattle
Planned Parenthood Los Angeles
Planned Parenthood of New York City
Prax(us)
Refugee Forum of Orange County
Reproductive Justice Collective
Reproductive Justice Committee of the Unitarian Society of Ridgewood (NJ)
Reproductive Rights Coalition of Monterey County
Robin H. Thompson & Associates
SisterLove, Inc.
Southwest Women's Law
Tewa Women United
The Feminist Women's Health Centers of California
The Institute of Women and Ethnic Studies
The New York Immigration Coalition
UCAN
Victims Resource Center
Women Who Care, Inc.
YWCA of the Sauk Valley
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