July 18, 2008

Ms. Nancy Fasano  
Director, Program Operations Branch  
Immunization Services Division, NCIRD/CDC  
1600 Clifton Road, Mailstop E-52  
Atlanta, GA 30333

Dear Nancy:

Thank you for the opportunity to participate in the strategic planning process for the immunization Public Health Advisor (PHA) program. The Association of Immunization Managers (AIM) is pleased to provide comments on the draft strategic plan.

AIM strongly supports the PHA program. This program strengthens the partnership between CDC and the states and provides valuable expertise and experience to state immunization programs. We are committed to working with you to maintain and enhance a strong PHA immunization program.

We believe that the best approach to maintain the strength and value of the program over time is to support the program with funds from the immunization appropriation before Section 317 grants are awarded to grantees. While a few states favor the flexibility and equality offered by providing funding to each state that could be used to support a PHA, the overwhelming majority of states support funding the program as a whole [32 AIM members voted in support, 2 against in a survey conducted July 15-18, 2008]. This approach would show strong federal commitment to public health advisors and remove any state politics from the decision about whether a state should participate in the program. This approach also removes state hiring freezes and personnel restrictions as a barrier to staffing the immunization program.

We agree that the program should provide an opportunity for every state to receive a public health advisor. In the past, many PHA positions have been unfilled and some states have not benefitted from the program. There may be an additional need for PHAs in specific states, and we recommend that CDC allow some flexibility to provide additional PHAs (without charging the state) based on factors such as need.
We hope you will commit to rebuilding the program and focus on recruiting and maintaining a strong workforce. We would be pleased to work in partnership with you on this.

We encourage you to implement changes to the PHA program over time. Some states that currently have multiple PHAs or no PHA will need time to prepare for changes to their personnel structure and budget.

Finally, we believe that the program would benefit from ongoing input and partnership with the states. We suggest that a steering or other committee be formed to include AIM and PHA representation. The committee could help guide the strategic plan implementation, design strategies to improve recruitment, and provide input on the timing and feasibility of any major changes or restructuring of the PHA program, such as the number of PHAs assigned to states.

Thank you for the opportunity to provide feedback on the PHA strategic plan and to participate in the strategic planning process. The program is critically important to the success of our immunization efforts, both on the state and federal level. We look forward to continued partnership in support of public health advisors.

Sincerely,

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Claire Hannan, MPH
Executive Director

cc: Laurel Wood, Chair