

Health technology assessment on extending the immunisation schedule to include HPV vaccination of boys

For public consultation

Consultation Feedback Form

Your feedback is very important to us. We welcome responses to all questions as well as any additional comments you would like to make.

When commenting on a specific section of a document, it would help if you can identify which element you are commenting on and the relevant page number.

The closing date for consultation is 5pm on Friday 7 September 2018

You may email or post a completed form to us. You may also complete and submit your feedback online at www.hiqa.ie.

About you

Name	Irish Medical Organisation
Address	10 Fitzwilliam Place, Dublin 2
Contact details	vhetherington@imo.ie
Date	

General Information and Questions

You may provide us with feedback on the specific questions (see questions that follow), or alternatively you may provide us with general comments.

Part 1

Are you replying in a personal capacity or on behalf of an institution or organisation?

Personal capacity

On behalf of an institution

On behalf of an organisation Irish Medical Organisation

Part 2

Please outline any general or specific feedback on the documents. In your response, where applicable, please specify the section to which you are referring.

The Irish Medical Organisation (IMO) wishes to congratulate HIQA on the quality of the draft health technology assessment on extending the immunisation schedule to include HPV vaccination of boys and the recent announcement by the Taoiseach to roll out the vaccination to boys.

The IMO welcomes the recommendations of the draft health technology assessment to change the HPV immunisation programme to include adoption of the 9-valent vaccine and to extend the HPV immunisation programme to include boys.

“On a population level, HPV vaccination of boys provides direct protection against HPV related disease, indirect herd protection to girls, and ensures vulnerable groups are protected who do not benefit from these herd effects (as in, men who have sex with men [MSM] and migrants who are ‘outside the herd’).”

The HPV vaccine is an important cancer preventing vaccine and it is good news that we plan to maximise the equity and resilience of the programme and the benefit across all our people.

Since 2010, there has been a national girls-only HPV immunisation programme in place. In 2014-2015 national uptake of the HPV vaccination among school girls reached its highest level of 87% but fell to 51% in 2016-2017 due to misinformation about the vaccine spread through the social media. Significant efforts on behalf of health professionals, the department of health and the HSE have been made in order to improve uptake in 2018 and indications suggest that uptake will rise this year to 62%. Continued efforts are needed by all parties to ensure high uptake of the vaccine among both girls and boys. The roll out of the 9-valent vaccine to school children must be accompanied by a fully resourced nationwide public education campaign.

The IMO is calling for the report's recommendations to be implemented with immediate effect and in full as failure to implement the recommended changes could have potential negative effects on the immunisation programme for the next few years in particular for the following reasons:

- Parents will become aware that a significantly more effective vaccine is to become available in the next year or so and may refuse consent for their daughters to be vaccinated, opt for the HPV9 vaccination when it becomes available. For the past few years in order to improve our uptake figures, immunisation teams have not been sticking rigidly to the first year cohort and have vaccinated girls from older classes whose parents had originally refused vaccination and had subsequently changed their minds. A situation could arise where our uptake figures could drop dramatically in the coming year, and then increase just as dramatically as soon as the HPV9 becomes available.
- Many experts in the US are now recommending that girls who have been previously vaccinated with HPV4 should now be vaccinated with HPV9. A situation could arise where parents of previously immunised girls could come back demanding the more effective vaccine for their daughters. If budgeting and contract constraints come into it, some US experts have suggested that remaining doses of HPV4 which the Health Service are contractually obliged to buy, should be given to boys, while HPV9 is given to girls, until any contractual obligations have expired, and from then on both boys and girls should be given the HPV9.

8.2.3.2. Cost of administering vaccine Page 305 "an immunisation team can process up to 100 vaccinations per day ...". The IMO is seeking clarification as to whether an immunisation team is to process 50 X2 vaccines per day or 100 X 2 vaccines, as in the latter case, the staffing and resource requirements may be far in excess of those indicated.

Finally, an immunisation team is described as comprising "an average of four staff (senior medical officer, two registered nurses and a clerical officer)". Official documents including HIQA documents no longer acknowledge the existence of area medical officers within the Irish health services. It is urgent that the HSE upgrades the position of area medical officers to senior medical officers.

Thank you for taking the time to give us your views.

After the closing date, we will assess all feedback and use it to finalise our documents. The final documents and the Statement of Outcomes (a summary of the responses) will be published on <http://www.hiqa.ie>.

If you wish to do so, you can request that your name and/or organisation be kept confidential and excluded from the published summary of responses. Please note that we may use your details to contact you about your responses. We do not intend to send responses to each individual respondent.

Please return your form to us either by email or post:



consultation@hiqa.ie



Health Information and Quality Authority
HTA on extending the immunisation schedule to include HPV
vaccination of boys
George's Court
George's Lane
Dublin 7



If you have any questions you can contact the consultation team by calling (01) 814 7463.

**Please return your form to us either by email or post before
5pm on Friday 7 September 2018**

Please note that the Authority is subject to the Freedom of Information Acts and the statutory Code of Practice regarding FOI.

For that reason, it would be helpful if you could explain to us if you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances.