



July 2, 2020

Allen Miller, President  
Sunshine Health Foundation  
2500 Fairmount Street #417  
Dallas, TX 75219

Re: Information Quality Request for Correction, dated 1/7/2020

Dear Mr. Miller:

This letter is in response to the recent Information Quality Request for Correction, dated January 7, 2020. This request is listed as #71 on the HHS website on Information Quality Requests at: <https://aspe.hhs.gov/information-requests-corrections-and-hhs-responses>.

We regularly review the content on our websites and appreciate the feedback you have provided.

Your letter asserts that “non-burning sun exposure, even in very large amounts, is not a risk factor for melanoma” and that “there is not a single study showing that non-burning sun exposure increases the risk of melanoma.”

After careful consideration of scientific evidence, we respectfully disagree. Ultraviolet (UV) radiation across the spectrum is classified as a human carcinogen (1)(2). Exposure to UV radiation has been shown in molecular studies to damage skin, skin cells, and DNA within skin cells and to trigger a tanning and pigmentation response (3)(4)(5). WHO has estimated that between 50% and 90% of melanomas can be attributed to sun exposure, depending on the population (6). Further evidence from studies of indoor tanning and melanoma shows an increase in risk for melanoma from indoor tanning in addition to the increase in risk from sunburns (7)(8).

If you wish to appeal this response to your requests for correction, you may submit a written hard copy or electronic request for reconsideration within 30 days of receipt of the agency’s decision. The appeal must state the reasons why the agency response is insufficient or inadequate. You must attach a copy of your original request and the agency’s response to it. Clearly mark the appeal with the words, “Information Quality Appeal” and send the appeal by e-mail to [InfoQuality@cdc.gov](mailto:InfoQuality@cdc.gov) or to: CDC/ATSDR, Attn: Mailstop H21-8 (attn.: Office of Science Quality); 1600 Clifton Road, N.E., Atlanta, GA 30333.

Thank you for your interest in the quality of information disseminated by CDC.

Sincerely,

/S/

Nicole F. Dowling, Ph.D.

Associate Director for Science

Division of Cancer Prevention and Control (DCPC)

National Center for Chronic Disease Prevention and Health Promotion (NCCDPHP)

cc:

Lisa C. Richardson, MD, MPH, Director, DCPC

Rachel Kaufmann, PhD, Associate Director for Science, NCCDPHP

#### References

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3. Gilchrest B, Eller M, Geller AC, Yaar M. The pathogenesis of melanoma induced by ultraviolet radiation. *N Engl J Med*. 1999;340(17):1341-1348.
4. Gilchrest BA, Eller MS. DNA photodamage stimulates melanogenesis and other photoprotective responses. *J Investig Dermatol Symp Proc*. 1999;4(1):35-40.
5. Moon H, Donahue LR, Choi E, et al. Melanocyte Stem Cell Activation and Translocation Initiate Cutaneous Melanoma in Response to UV Exposure. *Cell Stem Cell* 2017;21:665-678.
6. Lucas RM, McMichael AJ, Armstrong BK, Smith WT. Estimating the global disease burden due to ultraviolet radiation exposure. *Int J Epidemiol*. 2008;37(3):654-667.
7. Vogel RI, Ahmed RL, Nelson HH, Berwick M, Weinstock MA, Lazovich D. Exposure to indoor tanning without burning and melanoma risk by sunburn history. *JNCI J Natl Cancer Inst* 2014;106(7):dju219.
8. Boniol M, Dore JF, Greinert R, Gandini S, Cesarini JP. Re: Exposure to indoor tanning without burning and melanoma risk by sunburn history. *JNCI J Natl Cancer Inst* 2015;107(5):djv102.