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VIA ELECTRONIC TRANSMISSION

December 13, 2022

Centers for Disease Control and Prevention
1600 Clifton Road
Atlanta, GA 30329-4027 USA

Re: Agency/Docket Number 30Day-23-1273

Dear Director Walensky:

March of Dimes, the nation's leading nonprofit organization fighting for the health of all moms and babies, is pleased to provide the following comments to the Center for Disease Control and Prevention on the Pregnancy Risk Assessment Monitoring System (PRAMS) information collection system.

For 85 years, March of Dimes has led the fight for the health of all moms and babies. We continue that fight today as we work to address issues such as premature birth and maternal mortality through research, education, programs, and advocacy. March of Dimes' ongoing work to improve maternal and infant health is more important than ever as our nation is in the midst of a dire maternal and infant health crisis.

With increasing rates of maternal mortality,¹ preterm births,² and racial disparities,^{1,2} March of Dimes recognizes the importance and necessity of the PRAMS surveillance system to reduce infant mortality and adverse birth outcomes with a focus on safe motherhood.³ The population-based data that PRAMS collects, analyzes, and circulates assist in developing policies and programs to decrease adverse maternal and infant health outcomes. PRAMS surveys collect state maternal and child health data over time and allow for studies of disparities.³ These surveys enable states to stratify by characteristics including maternal age, race/ethnicity, geography of residence, and infant birth weight.³ PRAMS also provides data on maternal and infant health indicators which are not captured by other data sources.³

March of Dimes supports the creation, addition, and utilization of supplemental questionnaires on COVID-19 and respectful maternal care to measure how these factors impact maternal and infant health. For improved data access, March of Dimes requests that the PRAMS system eliminates the threshold for data release, which excludes data from states with low responses and can introduce geographical and nonresponse bias in the analysis and results.⁴ With the release of all state data, the PRAMS surveillance system can better inform policy and program developments to decrease maternal

¹ <https://www.gao.gov/assets/gao-23-105871.pdf>

² <https://www.marchofdimes.org/sites/default/files/2022-11/March-of-Dimes-2022-Full-Report-Card.pdf>

³ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6137777/>

⁴ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6137796/>



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and infant morbidity and mortality.⁴ March of Dimes would also like to request that the PRAMS system release data in a timely manner in formats that are easy to access and utilize.

March of Dimes supports the addition of updated electronic and technological collection techniques to the current methods (telephone and mail) to expand the survey to a larger population, especially underrepresented and underserved communities. March of Dimes applauds the PRAMS' current system of repeated contact attempts, reminders, follow-ups, incentives, and rewards to improve response rates.³

Thank you again for this opportunity to comment on the Pregnancy Risk Assessment Monitoring System (PRAMS) information collection system. We look forward to continuing to work together to improve our nation's maternal and infant health. If March of Dimes can be of any additional assistance to the CDC regarding this issue or other initiatives, do not hesitate to reach out to Kelly Hubbard at (217) 720-3301 or khubbard@marchofdimes.org.

Sincerely,

Stacey Y. Brayboy
Sr. Vice President, Public Policy & Government Affairs