PUBLIC SUBMISSION

As of: 11/9/22, 12:55 PM **Received:** September 07, 2022

Status: Pending_Post

Tracking No. 17s-3aae-r66r Comments Due: November 07, 2022

Submission Type: Web

Docket: CDC-2022-0102

Monitoring and reporting for the Overdose Data to Action Cooperative Agreement

Comment On: CDC-2022-0102-0001

Monitoring and reporting for the Overdose Data to Action Cooperative Agreement

Document: CDC-2022-0102-DRAFT-0002

Comment from Reamer, Andrew

Submitter Information

Name: Andrew Reamer

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Washington, DC, 20052 **Email:** areamer@gwu.edu

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General Comment

I ask that CDC commit that in the future for the OD2A PRA notices, it cites the most recent data on overdose deaths, not data that is five years old. While the Sept 6 FRN cites 47,000 overdose deaths in 2017, the OD2A website

(https://www.cdc.gov/drugoverdose/deaths/index.html) paints a far worse picture: "In 2020, 91,799 drug overdose deaths occurred in the United States. The age-adjusted rate of overdose deaths increased by 31% from 2019 (21.6 per 100,000) to 2020 (28.3 per 100,000)." It appears that for this PRA notice, CDC staff chose to rerun its 2019 notice without change (https://www.federalregister.gov/d/2019-15819). As updating the text with current data would have required under a minute of effort, I find that the Sept 6 FRN does not place CDC staff capabilities in a favorable light and hope that the CDC will find a way to do better in the future.

Angel, Karen C. (CDC/DDNID/NCIPC/OD)

From: NCIPC OMB (CDC)

Sent: Monday, November 21, 2022 12:03 PM

To: areamer@gwu.edu
Cc: NCIPC OMB (CDC)

Subject: Public submission to CDC-2022-0102-001

Dear Andrew Reamer:

As required under the Paperwork Reduction Act of 1995 (PRA) (44 U.S.C. 3501-3520) this letter is a response to your public comment. Thank you for your comment and identifying that the FRN included older overdose mortality data. We will ensure that future FRNs include more current data.

Please do not hesitate to contact us if we can be of further assistance. Best regards,

IRB/OMB Office

Centers for Disease Control and Prevention Chamblee Campus National Center for Injury Prevention and Control email:ncipcomb@cdc.gov