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Janet Hamilton, MPH

September 6, 2023

Re: National Electronic Health Records Survey Reinstatement

Document Identifier: 0920-1015

ICR REFERENCE NUMBER: 202308-0920-002

To whom it may concern:

Please find comments below from the Council of State and Territorial Epidemiologists (CSTE) on the Centers for Disease Control and Prevention (CDC) information collection request on the National Electronic Health Records Survey (NEHRS):

<https://www.federalregister.gov/documents/2023/08/07/2023-16758/agency-forms-undergoing-paperwork-reduction-act-review>.

CSTE is an organization of member states and territories representing all states and territories and over 3,100 applied public health epidemiologists. CSTE's mission is to promote the effective use of epidemiologic data to guide public health practice, improve health, and advocate for epidemiologic capacity, resources, and scientifically based policy. CSTE provides a national voice and support for state and local health departments to conduct surveillance, outbreak investigations, laboratory testing, and prevention of diseases and conditions of public health importance. Public health action by CSTE member states has led to improvements in clinical practice, medical procedures, surveillance, detection and control of public health threats, and the ongoing development of evidence-based disease control policies and prevention successes, including multiple position statements to standardize national surveillance efforts. CSTE and all epidemiologists at federal, state, and local public health agencies (PHAs) have a vested interest in successfully supporting and implementing interoperability through health information technology and electronic health record (EHR) systems.

We greatly appreciate the opportunity to comment on the reinstatement of the NEHRS, as well as the tremendous amount of thought and work that the CDC has invested in this product, which has critical importance to public health practice in the United States (US).

In answer to the specific questions presented:

1. Evaluate whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility.

CSTE strongly agrees that collecting representative information about using electronic health records (EHR) is necessary and supports a wide range of needs in the nation's public health system. Data from NEHRS is used to understand trends in EHR adoption and progress toward achieving the goals of the HITECH Act. It also serves utility at the state level by evaluating the landscape of EHR adoption. CSTE supports the additional rounds of NEHRS, as it will enhance clinical and public health systems' ability to react to emerging and evolving epidemics and improve care coordination. Understanding current trends in interoperability and how patient health information is exchanged with public health agencies are critical factors needed to promote timely public health responses.

2. Evaluate the accuracy of the agencies estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used;

CSTE finds the collection of the NEHRS survey data to be reasonable, and given the value of the information supporting modernized public health systems and clinical integration is critical.

3. Enhance the quality, utility, and clarity of the information to be collected;

CSTE finds the information collected to be clear. The additional justifications for future rounds of NEHRS represent critical priorities for health information exchange.

4. Minimize the burden of collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

Similarly noted above, the estimated burden seems reasonable given the value of the information collected.

5. Assess information collection costs.

There is no cost to respondents other than time, which seems reasonably estimated.

CSTE greatly thanks CDC for the opportunity to comment on this NEHRS and for considering these comments. We would be happy to address any questions or concerns by email or phone (si@cste.org or 770-458-3811), and we look forward to continued partnerships with CDC in the future.

Sincerely,



Janet Hamilton, MPH
Executive Director
Council of State and Territorial Epidemiologists