



July 11, 2025

Jeffrey M. Zirger
Information Collection Review Office
Centers for Disease Control and Prevention
1600 Clifton Road NE, MS H21-8
Atlanta, Georgia 30329

Re: Doc. 2025-10728, National Violent Death Reporting System (NVDRS)

Dear Mr. Zirger,

The Council of State and Territorial Epidemiologists (CSTE) supports the Centers for Disease Control and Prevention (CDC) proposed revision request to allow for the continued collection of information for the National Violent Death Reporting System (NVDRS) to measure the burden of violent deaths in communities throughout the United States including deaths by overdose, homicide, and suicide.

CSTE is a national organization representing all states and territories and over 3,500 applied public health epidemiologists. CSTE's vision is to achieve thriving and healthy people and communities everywhere and our mission is to advance the field of applied epidemiology to maximize health. CSTE champions expansion of applied epidemiology capacity and effective use of epidemiologic data to guide public health practice, implement science-based policy, and improve health. CSTE has a vested interest in promoting rules, regulations, and policies that advance health for all Americans, using robust public health surveillance and epidemiology practice. 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

As the sole state-based data source combining data on both the occurrence of violent deaths and their circumstances, the continued collection of NVDRS data are critical to CDC's mission to protect Americans from health and security threats and to the National Center for Injury Prevention and Control's (NCIPC) mission to prevent injury (e.g., youth falls, youth poisonings, older adult falls, traumatic brain injury, motor vehicle injuries), suicide, and violence across the lifespan through science and action. CDC has unparalleled, unique experience and expertise not available anywhere else in the federal government that is necessary to operate this system. NVDRS data are exceptional in quality and therefore inform prevention efforts and interventions at both the state and national levels.

NVDRS includes the State Unintentional Drug Overdose Reporting System (SUDORS) that collects key information about each fatal overdose. This valuable information is shared with jurisdictional stakeholders including child and family services, law enforcement, and behavioral health to build effective overdose prevention programs.

Additionally, NVDRS serves as the foundation for the crucial Web-based Injury Statistics and Query System (WISQARS), which use interactive platforms to provide valuable injury data such as the cost of injury which highlights the overall burden of injuries including overdose, suicide, and older adult falls. This information allows communities to plan their prevention and safety protocols and prevention programs. Data from NVDRS, SUDORS, WISQARS are frequently used in conjunction with other systems from hospitals and healthcare to give communities valuable health and safety insights.

CSTE fully supports CDC's continued collection of information for NVDRS at its current coverage including all 50 states, DC, and Puerto Rico. CSTE serves as a hub for best practices in applied epidemiology, convening injury and substance use epidemiologists through the Injury Surveillance Workgroup and Overdose Subcommittee. Members regularly share how NVDRS, SUDORS, and WISQARS data are used to improve public health efficiency and develop dynamic tools—such as dashboards—that detect trends in violent deaths and overdoses. CSTE has also partnered with CDC's NCIPC to develop and test best practice guidelines and enhance the interactive WISQARS platform.

CSTE remains committed to collaborating with CDC's NCIPC to strengthen the quality, utility, and accessibility of NVDRS and WISQARS, ensuring these vital injury data systems continue to support effective violence prevention efforts nationwide.

Data collection for overdose/injury prevention and response activities involves a close partnership between CDC, State, Territorial, Local and Tribal (STLT) health departments, healthcare, and other key organizations. CSTE appreciates the time estimates included in their request; these estimates likely include time to submit data but may not fully represent the necessary efforts for STLT public health professionals to collect, clean, and organize the data. Further continued federal resources and support for modernizing public health data systems is essential to ensure the systems can deliver optimal timely data for decision-making at each level of the public health system. The STLT Health departments rely on CDC for subject matter expertise and essential funding to support these activities through cooperative agreements to STLTs, which must be maintained at least at current levels to ensure the health and safety of all Americans. It is critical for the data to flow first through the STLT health departments where they are collected and acted upon, and then for a subset of relevant information to be securely provided at the national level for aggregation and reporting that will support STLT public health agencies and national partners in planning, implementing, and evaluating life-saving public health interventions within and across STLT borders. National reporting and aggregation of data also provides CDC with data critical to coordinate response and prevention activities, ultimately reducing negative health and economic impacts.

Thank you for considering these comments on behalf of our members working in STLT health agencies. Should you like to discuss these comments further, please contact letters@cste.org or (770) 458-3811.

Sincerely,

A handwritten signature in black ink, appearing to read 'Janet Hamilton'.

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