

July 11, 2025

Jeffrey M. Zirger
Lead, Information Collection Review Office
Office of Public Health Ethics and Regulations
Office of Science
Centers for Disease Control and Prevention.
1600 Clifton Road NE, MS H21-8
Atlanta, GA 40429

RE: National Notifiable Diseases Surveillance System (OMB Control No. 0920-0728, Exp. 03/31/2027)—Revision—Office of Public Health Data, Surveillance, and Technology (OPHDST), Centers for Disease Control and Prevention (CDC).

Dear Mr. Zirger:

The Council of State and Territorial Epidemiologists (CSTE) agrees with a three-year approval for the Centers for Disease Control and Prevention (CDC) to continue collecting information in the National Notifiable Disease Surveillance System (NNDSS) to (1) receive case notification data for Chagas disease, yersiniosis (non-pestis) and injuries related to firearms, new conditions under standardized surveillance; (2) receive new disease-specific data elements for toxoplasmosis and congenital toxoplasmosis.

CSTE is an organization of member states and territories 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. CSTE also supports the National Syndromic Surveillance Program Community of Practice (NSSP CoP), which includes over 1,400 public health professionals. CSTE's mission is to advance the field of applied epidemiology to maximize health, and CSTE aims to achieve this mission by driving innovation of applied epidemiologic practice and policy, by advancing health for all by engaging communities in data collection, access, analysis, and use, and by accelerating data modernization and data system interoperability. CSTE provides a national voice and support for state and local health departments to conduct surveillance, outbreak investigations, and laboratory testing, and to implement programs for the prevention of diseases and conditions of public health importance. CSTE also partners with the Centers for Disease Control and Prevention (CDC), ASTP/ONC, and other associations, along with its own members, to advance data modernization, improve data standardization, harmonization and interoperability to support the collection, management and use of data for public health action. Public health action by CSTE member states has led to improvements in the detection and control of public health threats, disease surveillance, public health informatics, and clinical practice, as well as led to the ongoing development of evidence-based disease control policies and prevention successes, including approximately 800 position statements to standardize national surveillance efforts.

CSTE fully supports CDC's continued collection of information for NNDSS.

NNDSS is necessary for the proper performance of CDC functions and is of practical utility to CDC's mission to protect Americans from health and security threats.

NNDSS data are a subset of data derived from investigations at the state, Tribal, local, and territorial (STLT) level. The information collected by NNDSS is critical to preserving the United States' health security by providing the CDC and STLT public health officials, the health care community, policy makers, and the public with information on disease trends and distributions. These data are used for national situation awareness and cluster/outbreak detection, particularly in situations that cross geographic boundaries. CDC's aggregation of epidemiologic data at the national level supports STLT public health agencies in planning, implementing, and evaluating life-saving public health interventions within and across STLT borders. CDC has unique subject matter expertise that is not available anywhere else in the federal government and this expertise is necessary to operate NNDSS and provide analysis of these data, which provide critical information to coordinate epidemic response and prevention activities, ultimately reducing negative health and economic impacts.

CSTE is committed to continued collaboration with CDC to enhance the quality, utility, and clarity of NNDSS and other data modernization efforts.

CSTE is the leading public health voice developing case definitions for notifiable diseases. Through our member-led, consensus-driven process, we prioritize, create, and maintain the case definitions used by STLT public health agencies to collect, categorize, and report diseases to CDC and the public. CDC's aggregation of notifiable diseases in NNDSS provides necessary comparability between STLTs, guiding the appropriate distribution of resources and interventions to control and prevent diseases of public health importance. Our members work to standardize data collection in accordance with national health information technology standards, and to modernize their reporting processes to continuously enhance NNDSS, ensuring it remains a useful and efficient system that is fundamental to our nation's public health infrastructure, responsive to emerging diseases and threats affecting our communities.

CSTE appreciates the time estimates included in the notice; these estimates likely include time to submit data to NNDSS but may not fully represent the necessary efforts for STLT public health professionals 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 public health agencies 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.

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 me at letters@cste.org or (770) 458-3811.

Sincerely,

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

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