



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: Docket No. 2025-10724, DFWED National Hypothesis Generation and Investigation Module

Dear Mr. Zirger,

The Council of State and Territorial Epidemiologists (CSTE) supports the Centers for Disease Control and Prevention (CDC) request for approval to continue collecting information in the Division of Foodborne, Waterborne, and Environmental Diseases (DFWED) National Hypothesis Generation and Investigation Module as described in the Federal Register Document 2025-10724.

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.

CSTE fully supports CDC's continued collection of information for the DFWED National Hypothesis Generation and Investigation Module. The information collected is critical to preserving the United States' health security by providing the CDC and state, Tribal, local, and territorial (STLT) public health officials, the health care community, policy makers, and the public with disease trends and distributions. CDC has unparalleled, unique experience and expertise not available anywhere else in the federal government that is necessary to operate this system. The system is critical for identifying outbreaks and emerging trends at both state and national levels and is necessary to improve the health, longevity and quality of life of Americans.

Data collection for infectious disease prevention and response activities involves a close partnership between CDC, 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 investigate illnesses and collect, clean, and organize the data. Further, continued federal resources and support for modernizing public health data systems are essential to ensure the systems can deliver optimal timely data for decision-making at each level of the public health system. 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.

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 data in the DFWED National Hypothesis Generation and Investigation Module improves our national capacity to identify and investigate outbreaks and 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 at an elemental level and modernize their reporting processes to continuously enhance the DFWED National Hypothesis Generation and Investigation Module, ensuring it remains a useful and efficient system fundamental to our nation's public health infrastructure, responsive to emerging diseases and threats affecting our communities. CSTE is committed to continued collaboration with CDC to enhance the quality, utility, and clarity of the DFWED National Hypothesis Generation and Investigation Module.

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 'Janet Hamilton'.

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