

From: [OMB-Comments \(CDC\)](#)
To: [Ray Serrano](#); [OMB-Comments \(CDC\)](#)
Subject: RE: Submission of LULAC Comment Letter — OMB Control No. 0920-1011
Date: Friday, November 21, 2025 7:18:14 AM
Attachments: [image001.png](#)

Good morning. I hope this message finds you well. Thank you for your interest in this CDC-sponsored data collection (Generic Clearance for Emergency Epidemic Investigations (EELs), OMB Control No. 0920-1011). The CDC's Information Collection Review Office (ICRO) was furloughed during the lapse in appropriations beginning October 1, 2025 and was subsequently affected by the Reduction in Force (RIF) on October 10, 2025. As part of the Continuing Resolution that was passed, the RIF Notice was rescinded, and some CDC staff have returned to their positions. The return to the office from both the furlough and RIF has resulted in a number of delays, and loss of access to systems that are critical to our work. CDC apologizes for any inconvenience or delay this may have caused.

CDC greatly appreciates the comment and the unique perspective of the League of United Latin American Citizens (LULAC). CDC also absolutely agrees that CDC's mission and the LULAC mission are not at odds – as both organizations seek to protect lives. Your concerns are valid and are taken seriously by CDC. LULAC makes the point that disclosing information can expose legal vulnerability and states that “the CDC may call participation voluntary; for many Latino families, saying no is not optional—it is protective.” This point is well taken. The Generic Clearance for Emergency Epidemic Investigations (EELs) is specifically designed to support CDC mission-critical functions by allowing CDC to deploy to the field to conduct EELs at the request of, and under the public health authority of, external partners seeking support for a rapid response to urgent public health problems. CDC wants to be very clear that respondents are informed that a response is not mandatory; it is collected on a voluntary basis and consent is obtained. Information in identifiable form (IIF) is not transmitted to CDC unless it is necessary for public health purposes. If IIF are transmitted to CDC, the information is sent using a password-protected electronic file, and any records are covered under CDC Privacy Act System of Records Notice (SORN) 09-20-0113, “Epidemic Investigation Case Records Systems Notice.” Additionally, before administering data collections, investigators inform respondents (either verbally or in writing) that participation is voluntary, and that respondents are not personally identified in any published reports of the study.

CDC understands the barrier that language can present. Each individual request for EEL is received and carried out by subject matter experts (SME) in different Centers/Divisions across the agency. As a whole, CDC recognizes the need for properly and fully translated consent forms and the effect these have on study participation. CDC has an excellent Translation Services Office that is routinely called upon to translate documents should the need arise when CDC staff is in the field.

As part of its comment, LULAC urged CDC to integrate community health workers—promotores de salud—into EEL field teams. LULAC is correct in its assertion that use of these community health workers would provide an added level of trust and would be an excellent addition to any CDC-directed EEL. This will absolutely be taken into consideration going forward.

The document LULAC has developed and provided is extremely helpful and clearly conveys the LULAC message. It will be included as a supplementary document when the PRA Clearance package is submitted to OMB for approval. This document will become available to the public when it is added to the www.RegInfo.gov site by OMB. Please let CDC know if additional materials are needed. CDC looks forward to continuing to work with LULAC in the future.

Regards,
Jeff



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From: Ray Serrano <rserrano@lulac.org>
Sent: Sunday, November 2, 2025 12:06 PM
To: OMB-Comments (CDC) <omb@cdc.gov>
Subject: Submission of LULAC Comment Letter — OMB Control No. 0920-1011

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Dr. Zirger,

I am forwarding the League of United Latin American Citizens' (LULAC) comment letter regarding the Extension of Generic Clearance for Emergency Epidemic Investigations (EEIs), OMB Control No. 0920-1011. The letter outlines LULAC's position and recommendations to ensure that rapid public health response efforts include strong civil rights, data privacy, and language access protections.

Please find the letter attached for your review and inclusion in the public record.

Respectfully,

Ray Serrano

**Ray Serrano, PhD,
MPH**

Director of Research and Policy
League of United Latin American



Citizens (LULAC)

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