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Comment from Anonymous

Submitter Information

Name: Anonymous Anonymous

General Comment

The Estimated Annualized Burden Hours appears to be inaccurate by a substantial amount. For example, the table estimates that epidemiologists will each report 40 cases of Kawasaki Syndrome annually. Given that the system receives input from approximately 60 State, City, and Territorial health departments (<https://www.cdc.gov/nchs/hus/sources-definitions/nndss.htm>), that estimates annual reporting of 2,400 cases. However, the CDC's own webpage on Kawasaki Disease (<https://www.cdc.gov/kawasaki/about/index.html>) states that in 2019, 3,693 children under 5 years of age were hospitalized (ergo, their cases almost surely reported) for Kawasaki Disease, or a hospitalization rate of 18.9 per 100,000 children in that age group. While the rate of Kawasaki Disease declined during the COVID-19 pandemic, the rate has rebounded post-COVID-19 (see, e.g., <https://publications.aap.org/aapgrandrounds/article-abstract/53/3/27/201170/Resurgence-of-Kawasaki-Disease-After-COVID-19?redirectedFrom=fulltext> ; <https://jamanetwork.com/journals/jamapediatrics/fullarticle/2797437> ; <https://pmc.ncbi.nlm.nih.gov/articles/PMC11472840/>). Given the unchanged means of transmission of Kawasaki Disease, and the fact that activity patterns have, essentially, returned to normal, there is no reason to anticipate that the incidence rate now and in the next three years would be different than that in 2019. Applying the hospitalization rate of 18.9/100,000 children under age 5 to the current population of US children under age 5 (18,599,314, per the US Census Bureau [<https://www.census.gov/data/datasets/time-series/demo/popest/2020s-national-detail.html>]), yields a total of 3,515 hospitalized cases (virtually all anticipated to be reported) ; the total number of cases would be even higher. An estimate of 2,400 cases/year represents an under-estimate by 32% (compared to a figure of 3,515, which is surely smaller than the true number of total cases).

Accordingly, it is very strongly recommended that the Estimated Annualized Burden Hours be recalculated for Kawasaki Disease, and for the other three diseases, as well.