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Hector F. Gonzalez, M.D., M.P.H.
Director of Health

March 26, 2019

Public Comment

Jeffrey M. Zirger
Information Collection Review Office
Centers for Disease Control and Prevention,
Department of Health and Human Services
Docket No. CDC-2018-0088
Laboratory Response Network (LRN)

Dear Mr. Zirger:

We are submitting the following comments regarding the Laboratory Response Network (LRN) on behalf of the City of Laredo Health Department.

"The LRN's mission is to maintain an integrated national and international network of laboratories that can respond to suspected acts of biological, chemical, or radiological terrorism and other public health emergencies."

We believe that any regulatory response to lessen the burden of the Paperwork Reduction Act is appropriate and furthermore are in support of the Centers for Disease Control and Prevention (CDC) submission of the information collection request for the LRN and its previously published (Proposed Data Collection Submitted for Public Comment and Recommendations) notice on October 4, 2018. CDC's request for a three (3) year extension without change to the data collection plan or tools should continue with any reasonable review as appropriate.

As the request for comments includes reference to regulatory burdens associated with the management of the LRN, we wish to raise our concern that the agency has reduced the number of laboratories in the network from 150 to 130. Such a reduction could have negative consequences. We highly recommend that additional LRN's be added to enhance laboratory infrastructure to improve health security capacity and the laboratory response network on the US/Mexico border, in particular for facilities at high volume ports of entry such as Laredo, Texas where there exists a critical need for an LRN facility. The City of Laredo possesses a Biosafety Level III (BSL III) laboratory which the Centers for Disease Control and Prevention (CDC) has certified for over 8 years. This facility is also approved for select agents. The Laredo facility is ready for approval of the LRN but lacks the long-term funding commitment from the CDC through its cooperative agreement with the Texas Department of State Health Services (DSHS) to make this happen.

As per its LRN mission to address health security we ask that the CDC fund adequate LRN laboratories on the US/Mexico border, with priority given to facilities at high volume ports of entry as is the case of Laredo, Texas on the US/Mexico Border a sister city of Nuevo Laredo Mexico, Tamaulipas.

Laredo is the number one inland port of entry with over 40% of all inland trade passing through our five (5) international bridges. Due to expanding international trade, daily commerce, use of medical facilities by eleven (11) surrounding rural counties, legal and illegal entry by persons from all over the world the LRN is needed to ensure international cross jurisdictional health security at the second largest custom district (Laredo, Texas sector). Adding an LRN facility in Laredo would also help to address International Health Regulations (IHR) threats, as well as local and regional health threats associated with bioterrorism, emerging and new biological, chemical or radiological health threats and emergencies.

At the Laredo port of entry, 16,000 trucks alone cross daily through one of our five (5) international bridges. As prompted by new and continuing trade agreements and opportunities with the countries of Mexico, Central and South America, China, and Europe, trade and population is expected to grow another 10-15%. Laredo's daily population grows to over 1 million, as impacted by visitors who reside in surrounding rural communities and counties and work in Laredo as well as visitors from our sister city of Nuevo Laredo, Tamaulipas, MX. Notably, at the most recent State of the Border address, the Chief of Customs and Border Patrol stated that the Laredo sector has apprehended individuals from 140 different countries. These conditions present daily health security concerns and threat of current, emerging, and new diseases including Middle Eastern Respiratory Syndrome (MERs), Influenza, Ebola and other highly infectious diseases, arbovirus (Dengue, West Nile, Zika and Chikungunya Virus), Botulism, Ricin and Multi Drug Resistant Tuberculosis that could all be weaponized and serve as a bioterrorism act. Anyone of these could pose a serious health threat and/or serve as a bioterrorist attack. The potential of all hazards, biological health threats and acts of bioterrorism obligate the City of Laredo Health Department (CLHD) to provide public health cross jurisdictional response to ensure international, local and regional health security. With nearly 80,000 people crossing through our border station daily, the Public Health response to contain disease domestically and internationally has been a challenge. This challenge is amplified as a result of inadequate resources and support for laboratory response, surveillance and in particular the lack of a nearby LRN laboratory to facilitate an appropriate disease and health threat confirmation for a timely response.

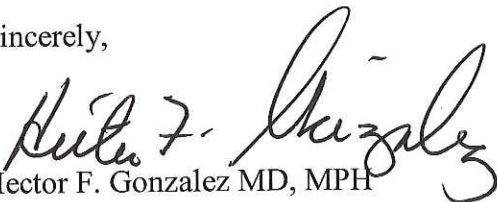
Resources for domestic and international health care services, risk assessment, disease surveillance, infection control, early detection, laboratory rapid response confirmation, food safety detection and disease prevention must be obtained for health security on the US/Mexico Border and in particular for the major port of entry- Laredo. Lack of adequate and timely reporting, rapid communication and coordination between local, state, national and international (Mexico) entities also poses a critical challenge to address disease control and health security incidents.

In Laredo we provide jurisdictional risk assessment, surveillance and response to bioterrorism, novel, emerging diseases and all hazards risks through a rapid coordinated and communication effort with state, federal and international partners. Yet we are not provided the necessary needed resources for this, the LRN support would enhance our capacity for early detection and confirmation of any disease threat. These are routine threats, as well from select agents (Ricin, Smallpox, anthrax and botulism), potential bioterrorism, and emerging and novel highly infectious that pose a risk. These are but a few examples of domestic and international health risks threats

through Laredo, TX. A Biosafety Level III (BSL III) and the Laboratory Response Network (LRN) fully at capacity, as well adequate surveillance and detection staff, will provide the critical assistance needed to deter health threats through early detection, confirmation and intervention.

We will be glad to answer any questions, please contact me to 956-795-4920.

Sincerely,

A handwritten signature in black ink, appearing to read "Hector F. Gonzalez". The signature is fluid and cursive, with a large, stylized "H" and "G".

Hector F. Gonzalez MD, MPH
Director of Health
City of Laredo Health Department
Laredo, Texas

cc: Honorable Henry Cuellar, Congressman 28th District of Texas
Honorable Pete Saenz, Mayor City of Laredo
Rosario Cabello, Co-Interim City Manager
Robert Eads, Co-Interim City Manager