

NACCHO

National Association of County & City Health Officials

The National Connection for Local Public Health

December 24, 2013

LeRoy Richardson

Chief, Information Collection Review Office, Office of Scientific Integrity

Office of the Associate Director for Science, Office of the Director

Centers for Disease Control and Prevention (CDC)

1600 Clifton Road, MS-D74

Atlanta, GA 30333

Re: Proposed Data Collections for *Clostridium difficile* (*C. difficile*) Infection Surveillance (FR Doc. 2013-25862)

Dear Mr. Richardson:

On behalf of the National Association of County and City Health Officials (NACCHO), I am writing to support extension of standardized data collection for *C. difficile* infections for an additional three years. NACCHO is the voice of the approximately 2,800 local health departments across the country. These city, county, metropolitan, district, and tribal departments work every day to protect and promote health and well-being for all people in their communities.

NACCHO's comments will focus on (1) whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility; and (2) ways to enhance the quality, utility, and clarity of the information to be collected.

NACCHO appreciates CDC's efforts to-date to conduct *C. difficile* surveillance through the Emerging Infections Program (EIP) Healthcare-Associated Infections Community Interface activity. The data that EIP sites have collected of 34 counties within 10 states have been instrumental in providing national estimates of *C. difficile* infections and enabling CDC to prioritize *C. difficile* as an urgent threat.¹ Better characterizing and understanding the national, state, and local burden of *C. difficile* infections will help to target prevention efforts, determine the effectiveness of those strategies, and monitor trends over time.

NACCHO also encourages participating EIP sites to engage and share timely *C. difficile* surveillance data with local health departments so that these agencies may be better able to work with healthcare facilities and implement prevention strategies, as local resources and capacity permit. Local health departments have current and potential roles in every aspect of preventing and controlling healthcare-associated infections (HAIs) but their involvement is often



limited by a lack of awareness of the infection burden from *C. difficile* and other microorganisms in their communities. Sharing information with local health departments is a critical first step that can lead to more comprehensive HAI prevention efforts within communities and stronger relationships between the public health and healthcare sectors.

NACCHO commends the leadership at CDC in recognizing and addressing the challenge public health, healthcare providers, and other stakeholders face in preventing and controlling HAIs. NACCHO looks forward to continued work with CDC in eliminating HAIs. Thank you for the opportunity to provide input on this important matter.

Sincerely,



Robert M. Pestronk, MPH
Executive Director

References

¹CDC. (2013). Antibiotic Resistance Threats in the United States, 2013. Retrieved December 24, 2013 from <http://www.cdc.gov/drugresistance/threat-report-2013/pdf/ar-threats-2013-508.pdf>.



Centers for Disease Control
and Prevention (CDC)
Atlanta GA 30333

December 27, 2013

Robert M. Pestronk
Executive Director
National Association of County & City Health Officials (NACCHO)
1100 17th Street, NW, Second floor
Washington, DC 20036

Re: Proposed Data Collection for *Clostridium difficile* Infection (CDI) Surveillance (FR Doc.2013-25862)

Dear Mr. Pestronk,

I appreciate the support of the National Association of County & City Health Officials (NACCHO) to extend data collection for the *C. difficile* infection surveillance through the Emerging Infections Program.

Local health departments play a key role in protecting the health of the American population and have played increased role in controlling and preventing healthcare-associated infections.

I thank NACCHO for the comments and continued support.

Sincerely,

A handwritten signature in black ink, appearing to read "Fernanda Lessa".

Fernanda Lessa
Medical Epidemiologist
Surveillance Branch
Division of Healthcare Quality Promotion
Centers for Disease Control and Prevention
1600 Clifton Rd NE
Atlanta, GA 30333