

Appendix 2c

Comments from the National Association of County and City Health Officials (NACCHO)

Comments were collected and submitted by Chris Aldridge, Senior Director – Infectious Disease and were received on Mon 1/5/2015 at 4:52 PM

General comments were:

- Overall the documents look good and are expected to be useful for local health departments. We do not anticipate they would be overly burdensome; rather they should help standardize how information is being collected across health departments.
- One of the main challenges will be the use of technology to reduce burden as health departments may be using different platforms and not have the resources to adapt the documents themselves.
- NACCHO already had requests for a form to be developed for Epi-Info.

Verbatim comments:

- (a) 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;
Yes, the proposed collection information will have practical utility and is needed for the proper performance of the functions described.
- (b) the agency's estimate of the burden of the proposed collection of information is accurate;
Yes, the agency's estimate of the burden of the proposed collection is reasonable. Although some of the forms are long, not all the information will apply to every situation, allowing health departments to focus only what is relevant to the situation at hand.
- (c) there may be ways to enhance the quality, utility, and clarity of the information to be collected;
Yes, there may be ways to enhance the quality, utility, and clarity of information to be collected.
- (d) there may be ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology; and
Yes, there may be ways to minimize the burden of collection using technology. The main challenge with technology will be developing products across multiple platforms. Local health departments may lack the resources to develop specific products for their own specific needs.
- (e) the estimates of capital or start-up costs and costs of operation, maintenance, and purchase of services to provide information are accurate.
Yes, the estimate of start-up costs, costs of operation, maintenance, and purchase of services to provide information appear reasonable.

CERT responses:

- Solicitation for NACCHO comments was delayed until Friday, December 19th. Documents had already been revised in consideration for CSTE comments.
- Upon receipt, CERT expressed gratitude for the comments.
- No specific changes to the documents were recommended.

/home/ec2-user/sec/disk/omb/icr/201501-0920-006/doc/52854201