



April 17, 2019

Dominic Mancini
Deputy Director
Office of Information and Regulatory Affairs
Office of Management and Budget
Washington, DC

Subject: Request for Emergency Review and Clearance

Dear Mr. Mancini:

Pursuant to Office of Management and Budget (OMB) procedures established at 5 CFR Part 1320, *Controlling Paperwork Burdens on the Public*, I request that the proposed information collection project, “Enhanced surveillance for cases linked to a multistate outbreak of multidrug-resistant *Campylobacter* infections linked to contact with pet store puppies” be processed in accordance with section 1320.13, Emergency Processing.

I have determined that this information must be collected prior to the expiration of time periods established under Part 1320, and that this information is essential CDC’s response to a multistate outbreak of multidrug-resistant *Campylobacter* infections linked to contact with pet store puppies. During 2016–2018 CDC, several states, and the U.S. Department of Agriculture’s Animal and Plant Health Inspection Service investigated a multistate outbreak of multidrug-resistant *Campylobacter* infections. Epidemic and laboratory evidence indicated that contact with puppies sold through Petland stores was the major source of this outbreak. A total of 113 people with laboratory-confirmed infections or symptoms consistent with *Campylobacter* infection were linked to this outbreak. Illnesses were reported from 17 states. The outbreak investigation was closed on January 30, 2018. Most isolates were resistant to azithromycin, ciprofloxacin, clindamycin, erythromycin, nalidixic acid, telithromycin, +/- gentamicin, and florfenicol; these include first-line antibiotics commonly recommended for treating *Campylobacter* infection. Antibiotic resistance may be associated with increased risk of hospitalization, development of a bloodstream infection, and treatment failure. This resistance pattern is very rare, only being documented in 0.3 percent of NARMS surveillance isolates. NARMS has been conducting surveillance for antimicrobial resistance in *Campylobacter* isolates since 1997.

In interviews, ill people answered questions about the foods they ate and any animal contact in the week before illness onset. Ninety-nine percent of people reported contact with a puppy in the week before illness started, and 87% reported they had contact with a puppy from Petland stores, or had contact with a person who became sick after contact with a puppy from a Petland store. Twenty-five ill people worked at Petland stores.

Unlike for most multistate foodborne disease outbreaks, the outbreak vehicle could not be removed from commerce. Therefore, it is likely that cases of human illness have continued. Current *Campylobacter* surveillance will likely not detect ongoing cases associated with the outbreak. Therefore we propose an enhanced surveillance project screening DNA sequences of *Campylobacter* isolates for the unique multidrug resistance pattern using predictive resistance software. Epidemiologic information regarding contact with puppies or dogs to determine ongoing transmission would then be collected from the newly



identified cases to determine if they can be linked to the outbreak. We are concerned about continued human illnesses and the potential for ongoing transmission of the multidrug-resistant outbreak strain.

Without actions and interventions put in place to address the use of antimicrobials, the outbreak will likely continue.

CDC cannot reasonably comply with the normal clearance given the high numbers of the general public exposed to dogs potentially shedding the multidrug-resistant outbreak strain. It is critical to the development of interventions and disease prevention programs to fully understand the scope of the outbreak associated cases. Given, the extremely multidrug-resistant nature of the outbreak strain and the potentially large number of people exposed to dogs shedding the outbreak strain, CDC requests an emergency clearance.

Please provide an approval/disapproval determination of this request to collect information under an emergency clearance by close of business one week after submission.

Respectfully,

Rima Khabbaz, MD
Director, National Center for Emerging and Zoonotic
Infectious Diseases (NCEZID), Centers for Disease Control
and Prevention (CDC)