



April 9, 2020

Dominic Mancini
Acting 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 the Office of Management and Budget (OMB) procedures established at 4 CFR 1320, Controlling Paperwork Burdens on the Public, I am writing to request that the following collection of information, *Emerging Infections Program Tracking of SARS-CoV-2 Infections among Healthcare Personnel*, be processed in accordance with section 1320.13 Emergency Processing.

I have determined that the information must be collected as soon as possible and that this information is essential to CDC's and state and local health departments' ability, as well as that of healthcare facilities, to effectively address the national public health crisis caused by the novel coronavirus SARS-CoV-2 (COVID-19). As rates of infection and resulting hospitalizations continue to rise across the nation, healthcare personnel (HCP) are facing significant risk of contracting SARS-CoV-2 during their interactions with patients with suspected or confirmed COVID-19 or patients with unrecognized infection. Understanding the factors that place HCP at greater risk for infection as well as factors that may reduce risk is critical to the nation's effective pandemic response. The U.S. healthcare workforce is among our most vital assets, and protecting our workforce also protects patients.

The CDC, in collaboration with Emerging Infections Program (EIP) sites, plans to implement a system to track and assess risk factors for SARS-CoV-2 infections among HCP. The objectives are to: 1) determine the extent of COVID-19 among HCP working in U.S. healthcare facilities; 2) describe characteristics of HCP exposed to or infected with SARS-CoV-2, including clinical activities and personal protective equipment use; and 3) compare exposures and other characteristics of HCP cases and exposed HCP that do not become cases to identify risk factors or protective factors for COVID-19.

Through this system, EIP site staff will identify a convenience sample of healthcare facilities within the EIP catchment areas. Hospitals and nursing homes are prioritized for inclusion, but other types of facilities may participate. Each EIP site will seek to identify three or more facilities to participate and will regularly obtain lists of HCP cases and contact information from state or local health departments or from healthcare facilities' occupational health departments or infection control programs. In some sites and facilities, EIP staff will also work with occupational health departments or infection control programs to obtain lists of HCP who are exposed to COVID-19 patient but did not become cases themselves. EIP staff will collect data from HCP via telephone interviews or a self-administered electronic case report form, including demographic information and information on underlying conditions, healthcare role, work locations, clinical activities, use of personal protective equipment, and exposures in community and healthcare settings. Data reported to EIP sites by HCP will be entered into a secure, CDC-developed database, such as a REDCap database. CDC staff will have immediate access to data submitted from all EIP sites; each EIP site will maintain access to its own data. Direct HCP identifiers such as name, email address or telephone number will not be shared with CDC.



CDC cannot reasonably comply with the normal clearance procedures due to the public harm that could escalate if routine processing of this request is required. CDC requests authorization to use a previously OMB-approved form (OMB Control No. 0920-1011, expiration date 04/23/2020) with minor modifications for 180 days to enable CDC and EIP sites to proceed immediately with tracking and interviewing of HCP infected with or exposed to SARS-CoV-2. Absent this emergency approval, CDC will not be able to implement *Emerging Infections Program Tracking of SARS-CoV-2 Infections among Healthcare Personnel* with the urgency that is required.

Please provide an approval/ disapproval determination of this request to collect information under an emergency clearance by close of business April 10, 2020.

Respectfully,

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