

July 11, 2025

Jeffrey M. Zirger  
Information Collection Review Office  
Centers for Disease Control and Prevention  
1600 Clifton Road NE, MS H21-8  
Atlanta, Georgia 30329

**Re: Docket No. 2025-10518, Risk factors, clinical course, presence and persistence of virus in various bodily fluids, and risk of sexual transmission among U.S. adults with Oropouche virus disease**

Dear Mr. Zirger,

The Council of State and Territorial Epidemiologists (CSTE) supports the Centers for Disease Control and Prevention (CDC) request for a reinstatement of the “Risk factors, clinical course, presence and persistence of virus in various bodily fluids, and risk of sexual transmission among U.S. adults with Oropouche virus (OROV) disease” project as a standard Information Collection Request under the Paperwork Reduction Act described in the Federal Register Doc. 2025-10518.

CSTE is a national organization representing all states and territories and over 3,500 applied public health epidemiologists. CSTE’s vision is to achieve thriving and healthy people and communities everywhere and our mission is to advance the field of applied epidemiology to maximize health. CSTE champions expansion of applied epidemiology capacity and effective use of epidemiologic data to guide public health practice, implement science-based policy, and improve health. CSTE has a vested interest in promoting rules, regulations, and policies that advance health for all Americans, using robust public health surveillance and epidemiology practice. Public health action by CSTE member states has led to improvements in clinical practice, medical procedures, surveillance, detection and control of public health threats, and the ongoing development of evidence-based disease control policies and prevention successes, including multiple position statements to standardize national surveillance efforts.

**CSTE strongly supports the continued collection of OROV data at the national and state, Tribal, local, and territorial (STLT) levels.** OROV is an emerging virus in the Americas that is spread to people by infected biting midges and some mosquito species. Collection of OROV disease information is essential for CDC and STLT health departments to monitor and respond to the potential introduction of this virus into the U.S and is necessary to improve the health, longevity and quality of life of Americans. Collection of these data provides critical information used to assess potential risk factors for OROV disease, describe the clinical course and outcomes of OROV disease among U.S. travelers, and to assess the prevalence and duration of OROV in various body fluids. The results of OROV disease investigations will inform prevention activities and messaging, and aid in clinical diagnosis and care. CDC has unparalleled, unique experience and expertise not available anywhere else in the federal government that is necessary to respond to OROV.

Data collection for OROV prevention and response activities involves a close partnership between CDC, STLT health departments, healthcare, and other key organizations. CSTE appreciates the time estimates included in their request; these estimates likely include time to submit data but may not fully represent the necessary efforts for STLT public health professionals to investigate illnesses and collect, clean, and organize the data. Further, continued federal resources and support for modernizing public health data systems are essential to ensure the systems can deliver optimal timely data for decision-making at each level of the public health system. STLT health departments rely on CDC for subject matter expertise and

essential funding to support these activities through cooperative agreements to STLTs, which must be maintained at least at current levels to ensure the health and safety of all Americans. It is critical for the data to flow first through the STLT health departments where they are collected and acted upon, and then for a subset of relevant information to be securely provided at the national level for aggregation and reporting that will support STLT public health agencies and national partners in planning, implementing, and evaluating life-saving public health interventions within and across STLT borders. National reporting and aggregation of data also provides CDC with data critical to coordinate response and prevention activities, ultimately reducing negative health and economic impacts.

Thank you for considering these comments on behalf of our members working in STLT health agencies. Should you like to discuss these comments further, please contact me at [letters@cste.org](mailto:letters@cste.org) or (770)458-3811.

Sincerely,

A handwritten signature in black ink, appearing to read "Janet Hamilton".

Janet Hamilton, MPH  
Executive Director  
Council of State and Territorial Epidemiologists