



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. 2025-10513, National Healthcare Safety Network

Dear Mr. Zirger,

The Council of State and Territorial Epidemiologists (CSTE) supports the Centers for Disease Control and Prevention (CDC) request for a three-year approval to continue collecting information in the National Healthcare Safety Network (NHSN) using the forms described in the Federal Register Doc. 2025-10513.

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.

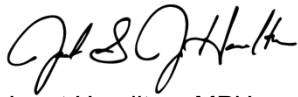
CSTE strongly supports the continued collection of data from healthcare facilities to enable public health action at the national, state, and local levels through NHSN. NHSN provides critical data that state, Tribal, local, and territorial (STLT) health departments use to monitor trends, identify problem areas, and mitigate healthcare-associated infections (HAIs) nationwide. This essential work, made possible by the data collected through NHSN, is a foundational element of keeping healthcare safe for every American. Whether it's a child visiting their pediatrician for a well-care appointment, an older adult being admitted for a surgical procedure, or any individual who unexpectedly finds themselves in the emergency department following an accident, no one should have to fear that they are putting themselves at risk by seeking healthcare. HAIs are preventable and NHSN data guide these public health prevention activities. These data are necessary for the proper performance of CDC functions and have practical utility in CDC's mission to protect Americans from health and security threats. CDC has unparalleled, unique experience and expertise not available anywhere else in the federal government that is necessary to operate this system. The system is critical for identifying emerging trends at both state and national levels and is necessary to improve the health, longevity and quality of life of Americans.

Data collection for NHSN and healthcare-associated infections 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 data reporters 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 be aggregated and reported at the national level to 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.

CSTE is committed to continued collaboration with CDC to enhance the quality, utility, and clarity of NHSN data. 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 or (770)458-3811.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Hamilton'.

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