

Vice, Rudith (CDC/NCEZID/OD)

From: NCEZID PRAmailbox (CDC) <NCEZIDPRAmailbox@cdc.gov>
Sent: Thursday, August 28, 2025 7:45 AM
To: hharmon@ahca.org
Subject: CDC-2025-0023-National Healthcare Safety Network (NHSN) Patient Impact Module for Coronavirus (COVID-19) Surveillance in Healthcare Facilities

Ms. Harmon,

Thank you for submitting your comment on CDC NHSN's OMB package 0920-1317. Please see our follow-up regarding each of your specific comments below.

- 1. AHCA/NCAL believes the ongoing collection of information for NHSN respiratory data, including respiratory pathogen and vaccination is not necessary for the proper performance of the functions of the agency, does not have practical utility and is duplicative with MDS reporting.**

The Centers for Medicare & Medicaid Services (CMS) is the regulatory body overseeing these reporting requirements. CDC's NHSN is the data system utilized by CMS enabling users to satisfy these reporting requirements. We understand your concerns and will share your comments with CMS. We will also continue to work with CMS to ensure the best public health data is available for action by facilities, states, jurisdictions, and federal partners.

- 2. AHCA/NCAL believes the agency has underestimated the burden of the proposed collection of information, including the validity of the methodology and assumptions used.**

The burden calculations are estimates based on the data received by CDC NHSN and are based on estimates for all facilities that collect the data, including acute care hospitals. Some facilities may take longer to collect data and submit data as compared to other facilities and we must submit an overall estimated calculation for all facilities that submit data. We will, however, take your feedback into consideration.

- 3. AHCA/NCAL believes the information collection times and resulting costs are not adequately assessed and are understated.**

The time and cost calculations are estimates based on the data received by CDC NHSN. As required by the Office of Management and Budget (OMB), the average salary of the professional discipline expected to perform surveillance is used in the calculations of burden and is based on data from the Department of Labor, Bureau of Labor & Statistics, which can be found via the following link [Occupational Employment and Wage Statistics \(bls.gov\)](https://www.bls.gov/occupational-employment-and-wage-statistics). We will, however, take your feedback into consideration.

- 4. AHCA/NCAL recommends that additional federal resources, support, and flexibilities be directed toward long term and post-acute care providers to further their digital maturity in order to advance technological collection techniques.**

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