

GREATER NEW YORK HOSPITAL ASSOCIATION

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August
Fourteen
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. CDC-2025-0023

Dear Mr. Zirger:

On behalf of Greater New York Hospital Association (GNYHA) and our 200+ not-for-profit and public hospitals and health systems across five states, I am writing to provide comments on the proposed information collection project titled National Healthcare Safety Network (NHSN) Respiratory Data. The comments are in response to the recent request for public input as required by the Paperwork Reduction Act of 1995.

While we understand the intent behind standardized data collection for public health surveillance, we believe that the current reporting requirements do not provide meaningful benefit to hospitals. Instead, they represent a significant administrative burden, particularly for infection prevention and control staff who are diverted from essential clinical and safety-related duties to fulfill these reporting obligations.

The practical utility of the reporting process is limited because hospitals do not receive actionable feedback or insights in return for the data submitted. In some cases, facilities must manually abstract data for submission even though much of the required information is already available through laboratory systems. This further strains already limited resources. The requirements are also duplicative of some states' requirements.

We urge the Centers for Disease Control and Prevention and the Office of Management and Budget to consider the following recommendations:

- **Streamline reporting requirements** so that existing laboratory data sources are used and states can easily use the data for local purposes, minimizing the administrative burden to hospital staff
- **Provide timely, facility-specific feedback** that can inform infection prevention strategies. If certain data points must be collected, then hospitals should receive clear, actionable insights in return—ideally in a format that supports local decision-making and quality improvement.
- **Explore automation and integration options** to minimize manual data entry, especially for facilities that currently rely on manual abstraction



GNYHA is a dynamic, constantly evolving center for health care advocacy and expertise, but our core mission—helping hospitals deliver the finest patient care in the most cost-effective way—never changes.

- **Reassess the overall burden estimate** and consider the operational impact on hospital staff, particularly infection prevention teams

We are happy to engage in further discussion or provide additional input to support improvements to the reporting process.

Sincerely,

A handwritten signature in black ink, appearing to read 'EDP', with a stylized flourish at the end.

Erin DuPree, MD, FACOG
Senior Vice President and Physician Executive, Quality and Clinical Initiatives