

Note to reviewer:

This document was updated January 28, 2026 after receipt of an additional comment received through standard mail.

CDC received a total of 83 comments in response to the CDC National HIV Surveillance System (NHSS) published in the Federal Register on September 30, 2025, Volume 90, Number 187, Pages 46891-46893 (Docket No. CDC-2025-0519).

Summary of Public Comment Types Received

1. **Non-Substantial Comments:** 42 comments expressing support for the continuation of NHSS, with contact information provided.
 - a. Please see “General Response Note” below for additional information on response template.
 - b. Individual addresses, contact information for commenters, and letterhead will be added once approved.
2. **Substantial Comments:** 22 comments requiring detailed responses, directed to both national organizations and local community-based organizations.
 - a. Individual draft responses for clearance follow the generalized draft response and are addressed to appropriate commenter and will be placed on letterhead once approved.
3. **Comments with no contact information:** 18 comments that do not require a response due to lack of contact information.
4. **Excluded Comments:** 1 comment that was not specific to NHSS.

Responses will be sent by email if an email address is included. Responses will be sent by regular mail if no email was identified or could be located. A general response template for non-substantial comments and specific responses for substantial comments are presented below.

General Response Note: This will be customized for non-substantial comments of support where contact information was provided. These comments did not provide any specific recommendations. The highlighted portions below will be customized as needed.

NOTE: Include date and address only on hard copy not in email.

[DATE]

RECIPIENT NAME

[RECIPIENT'S TITLE]

[DEPARTMENT/ORGANIZATION]

[STREET ADDRESS]

[CITY, STATE ZIP CODE]

Subject: Response to Comments on NHSS Docket No. 2025-18904

Dear _____,

On behalf of the Centers for Disease Control and Prevention (CDC), thank you for your comments made in support of continuing the data collection for the CDC National HIV Surveillance System (NHSS) published in the Federal Register on September 30, 2025, Volume 90, Number 187, Pages 46891-46893 (Docket No. CDC-2025-0519).

CDC appreciates your insights and recognizes the critical role that NHSS plays in understanding HIV. Your emphasis on the importance of maintaining a robust surveillance system aligns with CDC's commitment to effectively monitor trends and allocate resources for HIV prevention and care. Your support reinforces the critical role of NHSS by enabling HIV prevention and care programs to focus resources on areas of greatest impact to reduce the number of new HIV infections and improve health outcomes for people living with HIV.

Thank you again for your comments. Your perspective is valuable as CDC reviews the proposed data collection for NHSS. CDC appreciates your support of NHSS data collection and continued commitment to end HIV in the United States.

Sincerely,

HIV Surveillance Branch
Division of HIV Prevention
Centers for Disease Control and Prevention (CDC)
Department of Health and Human Services

Equitas Health
1105 Schrock Rd
Suite 400
Columbus, OH 43229

Subject: Response to Comments on NHSS Docket No. 2025-18904

Dear Colleagues at Equitas Health,

On behalf of the Centers for Disease Control and Prevention (CDC), thank you for your comments made in support of continuing the data collection for the CDC National HIV Surveillance System (NHSS) published in the Federal Register on September 30, 2025, Volume 90, Number 187, Pages 46891-46893 (Docket No. CDC-2025-0519).

Your comments noting NHSS uniquely vital role in informing and guiding your work, focusing on people in most need and strengthening integrated care services, are acknowledged. NHSS enables tailoring of programs such as HIV testing, Pre-Exposure Prophylaxis (PrEP) and treatment services; identification of areas and populations in greatest need of services, and rapid adaptation to emerging needs. These capabilities add efficiency and support evidence-based programmatic responses. The utility of HIV trends obtained through ongoing data collection to identify emerging needs, guide resource allocation and funding are acknowledged.

CDC is committed to expanding mechanisms to obtain input on surveillance activities and aims to make surveillance data widely accessible.

Your perspectives are valuable as CDC reviews the proposed NHSS data collection. CDC appreciates your comments in support of NHSS data collection and for your ongoing commitment to end HIV in the United States.

Sincerely,

HIV Surveillance Branch
Division of HIV Prevention
Centers for Disease Control and Prevention
Department of Health and Human Services

Omar Martinez Gonzalez
Senior Manager, Policy & Advocacy
AIDS Foundation Chicago
200 W Monroe St, Suite 1150
Chicago, IL 60606
Omartinezgonzalez@aidschicago.org

Subject: Response to Comments on NHSS Docket No. 2025-18904

Dear Mr. Martinez,

On behalf of the Centers for Disease Control and Prevention (CDC), thank you for your comments made in support of continuing the data collection for the CDC National HIV Surveillance System (NHSS) published in the Federal Register on September 30, 2025, Volume 90, Number 187, Pages 46891-46893 (Docket No. CDC-2025-0519).

The comments on disparities in HIV testing, treatment, and prevention services and how disparities impact certain minority populations are acknowledged. The observations about the Ending the HIV Epidemic initiative in its first two years are noted, including efforts to improve diagnosis, linkage and relinkage of people with HIV to care. The implementation of data-driven programs using NHSS to promote fiscal responsibility and efficiency are recognized.

Concerns about the potential effects of the cessation of NHSS data collection on HIV control and prevention efforts, including reduced ability to identify and respond to HIV outbreaks are also acknowledged. HIV data collected via NHSS provides insights into the dynamic and changing trends, and needs for response.

CDC appreciates your comments in support of NHSS data collection and for the ongoing commitment to end HIV in the United States. Your perspectives are valuable as CDC reviews the proposed NHSS data collection.

Sincerely,

HIV Surveillance Branch
Division of HIV Prevention
Centers for Disease Control and Prevention
Department of Health and Human Services

Recovery Mobile Clinic
7111 Dixie Hwy #142
Clarkston, MI 48346-2077

Subject: Response to Comments on NHSS Docket No. 2025-18904

Dear Colleagues at Recovery Mobile Clinic,

On behalf of the Centers for Disease Control and Prevention (CDC), thank you for your comments made in support of continuing the data collection for the CDC National HIV Surveillance System (NHSS) published in the Federal Register on September 30, 2025, Volume 90, Number 187, Pages 46891-46893 (Docket No. CDC-2025-0519).

The comment on the need to recognize shifting trends in HIV transmission in communities is noted. A primary purpose of NHSS is to provide critical data to monitor HIV trends, transmission patterns, and detect and respond to communities experiencing rapid or changing HIV transmission and clusters. The comments and suggestions to improve cluster identification and tracking are acknowledged.

Your perspectives are valuable as CDC reviews the proposed data collection for NHSS. CDC appreciates your comments in support of NHSS data collection, continued commitment to provide HIV testing services and care, and ongoing efforts to end HIV in the United States.

Sincerely,

HIV Surveillance Branch
Division of HIV Prevention
Centers for Disease Control and Prevention
Department of Health and Human Services

Michael D. Boyd
Senior Vice President, Government Affairs and Policy
Gilead Sciences, Inc.

Subject: Response to Comments on NHSS Docket No. 2025-18904

Dear Mr. Boyd,

On behalf of the Centers for Disease Control and Prevention (CDC), thank you for your comments made in support of continuing the data collection for the CDC National HIV Surveillance System (NHSS) published in the Federal Register on September 30, 2025, Volume 90, Number 187, Pages 46891-46893 (Docket No. CDC-2025-0519).

The recognition of NHSS as the cornerstone of our nation's HIV response is noted. NHSS provides policymakers, health departments and communities, with comprehensive, standardized, and high-quality surveillance data needed to track the HIV, identify gaps in prevention and care, guide policy decisions, allocate resources, and measure progress towards goals. As you mentioned, these data enable public health programs to focus resources on areas of greatest impact and contribute to reducing the number of new HIV infections, which can lower downstream costs to the healthcare system and society. The role of NHSS data in outbreak detection and response activities is also acknowledged.

The multiple functions of NHSS in monitoring HIV trends and care outcomes, informing policy and guiding resource allocation, rapid detection of clusters and outbreaks and the associated response support the continuation of NHSS data collection. As you noted, the FY26 Congressional Justification for the proposed new Administration for a Healthy America (AHA) described the identification of 400 HIV clusters; a justification made possible with NHSS data. The comments on the broad use of NHSS data for care funding and planning at all levels and the reliance of Gilead Sciences' FOCUS program on NHSS data for decision making and resource allocation are also acknowledged.

Your perspectives are valuable as CDC reviews the proposed data collection for NHSS. CDC appreciates your comments in support of NHSS data collection and continued commitment to end HIV in the United States.

Sincerely,

HIV Surveillance Branch
Division of HIV Prevention
Centers for Disease Control and Prevention
Department of Health and Human Services

Carie Harter
Senior Director, Government Relations
ViiV Healthcare

Subject: Response to Comments on NHSS Docket No. 2025-18904

Dear Ms. Harter,

On behalf of the Centers for Disease Control and Prevention (CDC), thank you for your comments made in support of continuing the data collection for the CDC National HIV Surveillance System (NHSS) published in the Federal Register on September 30, 2025, Volume 90, Number 187, Pages 46891-46893 (Docket No. CDC-2025-0519).

The comment regarding NHSS's critical role in advancing HIV prevention, treatment, care, and policy development is acknowledged. Your recognition of NHSS as an essential tool for data-driven decision making, for monitoring progress towards national HIV prevention and treatment goals as well as the goals of Ending the HIV Epidemic initiative are noted. The value of NHSS in identifying areas of need, whether by demographic or by geographic community, and promoting programmatic efficiency and increasing the impact per dollar spent is well recognized.

The recommendation to prioritize data timeliness and completeness is acknowledged. CDC has historically placed strong emphasis on both and works closely with state and local health departments to provide funding, technical assistance and support for quality HIV surveillance data and to address issues and barriers that prevent data completeness and/or timeliness.

CDC acknowledges the comment related to the contribution of social and community factors affecting health and of the role of social determinants of health (SDOH) to the transmission and spread of communicable diseases. CDC funds state and local health department surveillance and prevention programs that support whole person approaches to HIV prevention and care. These programs incorporate syndemic approaches and consider social and structural factors that create barriers to HIV prevention and care services.

The comments regarding data accessibility and transparency are acknowledged. With respect to these comments, CDC is committed to transparency in its data collection processes and makes data available to the public to the fullest extent permitted by law and HIV data re-release policies. To improve timeliness, CDC releases quarterly select preliminary data at the national level, and separately for jurisdictions participating in the Ending the HIV Epidemic initiative.

The comments related to improving geographic and demographic granularity are noted. CDC continues to promote the broadest use of data in agency publications and reports while protecting privacy and confidentiality. CDC publishes reports with more detailed age group breakdowns to reflect the aging population of people with HIV.

Your comment regarding the need for continued investment in NHSS to achieve a future free of HIV is noted.

Your perspectives are valuable as CDC reviews the proposed data collection for NHSS. CDC appreciates your support of NHSS data collection and continued commitment to end HIV in the United States.

Sincerely,

HIV Surveillance Branch
Division of HIV Prevention
Centers for Disease Control and Prevention
Department of Health and Human Services

Ronald G. Nahass, MD, MHCM, FIDSA
President, IDSA
Anna K. Person, MD, FIDSA
Chair, HIVMA

Subject: Response to Comments on NHSS Docket No. 2025-18904

Dear Mr. Nahass and Ms. Person,

On behalf of the Centers for Disease Control and Prevention (CDC), thank you for your comments made in support of continuing the data collection for the CDC National HIV Surveillance System (NHSS) published in the Federal Register on September 30, 2025, Volume 90, Number 187, Pages 46891-46893 (Docket No. CDC-2025-0519).

The comment regarding the essential role NHSS plays in achieving the goals of Ending the HIV Epidemic initiative is acknowledged. The fact that over 20,000 physicians and clinicians, researchers, scientists and public health workers' work depends on and is guided by NHSS data is significant and provides CDC with information about the use of NHSS data.

The comments on areas of specific interest mentioned in your letter are noted:

- The need to evaluate data collected to assess program performance is acknowledged. NHSS is designed to collect most relevant HIV related information to monitor HIV trends and progress towards the achievement of national goals and to detect shifts in HIV burden, transmission and clusters. Given the dynamic nature of HIV surveillance ongoing assessment of existing practices is required to adopt new methods and technology as appropriate.
- The need to enhance the quality, utility, and clarity of NHSS data is recognized. CDC uses standardized definitions and data collection methods to promote quality, consistency and timeliness of data across all HIV surveillance jurisdictions. Data evaluation is continuous and adjustments to collection and reporting procedures are implemented as needed.
- Minimizing the burden of data collection through appropriate automation and technology is a priority. NHSS supports health departments' use of electronic data collection and reporting methods, including electronic data submission to CDC. Capacity to implement electronic case reporting, electronic health records, or other electronic reporting methods varies among health departments; therefore, paper forms remain available for a small number of jurisdictions. After years of effort, nearly all HIV-related laboratory data are now collected and transmitted electronically to health departments. This improves timeliness and reduces potential errors (e.g. keystroke errors), improving data quality and accuracy.
- Modernization of data systems both increases efficiency and results in long-term cost savings. Data modernization is a top priority for CDC and efforts are underway to enhance data systems to align with evolving public health needs and technological advances, including systems supported as part of NHSS.

- The role of HIV surveillance in saving lives and federal resources is acknowledged. CDC serves as the primary source of NHSS data and provides essential support to state and local health departments for surveillance activities. These activities are an integral component of the efforts to address syndemics, including HIV, hepatitis C, sexually transmitted infections, tuberculosis and infections associated with the opioid epidemic.
- Finally, your comments regarding the continued and robust collection of HIV surveillance data and ongoing investments in NHSS and related infrastructure to support a future free of HIV are acknowledged.

Your perspectives are valuable as CDC reviews the proposed data collection for NHSS. CDC appreciates your support to continuing the data collection for NHSS and continued commitment to end HIV in the United States.

Sincerely,

HIV Surveillance Branch
Division of HIV Prevention
Centers for Disease Control and Prevention
Department of Health and Human Services

Mr. Roman Palomares
LULAC National President and Board Chairman
150 18th Street, NW, Suite 275
Washington, DC 20036

Subject: Response to Comments on NHSS Docket No. 2025-18904

Dear Mr. Palomares,

On behalf of the Centers for Disease Control and Prevention (CDC), thank you for your detailed and thoughtful comments made in support of continuing the data collection for the CDC National HIV Surveillance System (NHSS) published in the Federal Register on September 30, 2025, Volume 90, Number 187, Pages 46891-46893 (Docket No. CDC-2025-0519).

Your comments underscoring the importance of balancing public health goals with the civil rights and privacy protections that are essential to building and maintaining trust are acknowledged. We appreciate your commitment to ensuring that public health efforts uphold the dignity, privacy, and civil rights of the communities most affected by HIV.

Your comments regarding the need for strong safeguards, clear accountability, and meaningful community engagement and insights into the risks of re-identification, the importance of language access, and the potential unintended consequences of cluster investigations and data-to-care programs are noted. CDC is committed to ensuring that HIV surveillance efforts protect both public health and individual privacy and have strong security measures in place to ensure that HIV data are protected at CDC and health departments.

Finally, your recommendations for strong regulatory protections, multilingual access, community oversight, and transparency for a surveillance system that communities can trust are also noted.

Your perspectives are valuable as CDC reviews the proposed NHSS data collection. CDC appreciates your comments in support of NHSS data collection and will continue to work to ensure surveillance data are protected and consider these points as we work to strengthen NHSS.

Sincerely,

HIV Surveillance Branch
Division of HIV Prevention
Centers for Disease Control and Prevention
Department of Health and Human Services

Kimberleigh Smith
Callen-Lorde Community Health Center
356 West 18th St.
New York, NY 10011

Subject: Response to Comments on NHSS Docket No. 2025-18904

Dear Kimberleigh Smith,

On behalf of the Centers for Disease Control and Prevention (CDC), thank you for your comments made in support of continuing the data collection for the CDC National HIV Surveillance System (NHSS) published in the Federal Register on September 30, 2025, Volume 90, Number 187, Pages 46891-46893 (Docket No. CDC-2025-0519).

CDC acknowledges Callen-Lorde's description of NHSS as a foundational component of the national HIV response and its role in supporting program planning, quality improvement, and comparative analyses across providers and jurisdictions. Input describing how surveillance data are used to inform clinical priorities, resource allocation, and evaluation of care outcomes is noted and contributes to CDC's understanding of the practical utility of NHSS.

CDC has noted comments regarding the importance of timely and complete surveillance data for monitoring trends in diagnoses, linkage to care, viral suppression, and outbreak detection. NHSS is designed to support these public health functions and to provide standardized indicators used across federal, state, and local HIV programs.

Your observations regarding demographic detail, including race, ethnicity, sexual orientation, and gender identity, as well as contextual factors affecting HIV outcomes, are acknowledged. CDC collects and reports surveillance data in accordance with Office of Management and Budget (OMB) standards and applicable federal policies to ensure consistency, data quality, and protection of confidentiality. In 2025, CDC removed gender identity and modified the collection of sex on the Adult/Adolescent and Pediatric Case Report Forms in accordance with Executive Order 14168. State and Local health departments may collect additional information to support local analyses in accordance with state/local laws and regulations.

CDC acknowledges the comments related to privacy, confidentiality, and community trust. NHSS data are covered by an Assurance of Confidentiality under Section 308(d) of the Public Health Service Act. CDC is committed to ensure HIV surveillance data are secure, used solely for public health purposes and released in accordance with policy and standards.

Comments regarding surveillance modernization, reporting efficiency, and transparency in analytic methods and technical documentation have been noted. CDC continually evaluates HIV surveillance data to improve its quality, timeliness, and accessibility while minimizing reporting

burden and safeguarding privacy. CDC provides funds to state and local health departments through cooperative agreements and grants to support critical public health infrastructure.

These perspectives are valuable as CDC reviews NHSS data collection. CDC appreciates Callen-Lorde Community Health Center's engagement in the public comment process and its continued commitment to HIV prevention, treatment, and care and commitment to end HIV in the United States.

Sincerely,

HIV Surveillance Branch
Division of HIV Prevention
Centers for Disease Control and Prevention
Department of Health and Human Services

SIECUS, Sex Ed for Social Change
4315 50th St. NW, Suite 100. PMB #4605
Washington, DC 20016

Subject: Response to Comments on NHSS Docket No. 2025-18904

Dear Colleagues at SIECUS,

On behalf of the Centers for Disease Control and Prevention (CDC), thank you for your comments made in support of continuing the data collection for the CDC National HIV Surveillance System (NHSS) published in the Federal Register on September 30, 2025, Volume 90, Number 187, Pages 46891-46893 (Docket No. CDC-2025-0519).

The comments regarding the critical and uniquely vital role of the NHSS, and the ways in which NHSS data inform and guide your work, are noted. CDC acknowledges the need to provide high-quality surveillance data that promotes community responsiveness to shifting epidemiologic patterns. Your input regarding how NHSS data supports the development of curricula and educational materials that are responsive to the current HIV landscape contributes to CDC's understanding of the practical utility of NHSS.

The comment concerning the need for expanded clarity in demographic data is acknowledged. CDC adheres to the Office of Management and Budget (OMB) standards for age and race and ethnicity classifications, which provide a consistent framework for data reporting and enable standardized data presentation while protecting individual privacy. In accordance with state and local laws and regulations, health departments may collect more detailed demographic information, including expanded race and ethnicity information. Capturing a broad spectrum of racial and ethnic identities facilitates a more nuanced understanding of health disparities to tailor prevention and care services.

The recommendation for CDC to implement a standardized approach to collecting gender identity and sexual orientation across all jurisdictions is acknowledged. As a federal agency, CDC must comply with federal directives. In 2025, CDC removed gender identity and modified the collection of sex on the Adult/Adolescent and Pediatric Case Report Forms in accordance with Executive Order 14168.

CDC is committed to ensuring transparency in reporting and timeliness standards to maintain the continued utility of NHSS for HIV prevention and care partners.

Your perspectives are valuable as CDC reviews NHSS data collection. CDC appreciates your support for the continuation of NHSS data collection and your ongoing commitment to end HIV in the United States.

Sincerely,

HIV Surveillance Branch
Division of HIV Prevention
Centers for Disease Control and Prevention
Department of Health and Human Services

PrEP in Black America (PIBA)
Email Correct: piba@prepinblackamerica.org

Subject: Response to Comments on NHSS Docket No. 2025-18904

Dear Colleagues at PIBA,

On behalf of the Centers for Disease Control and Prevention (CDC), thank you for your comments made in support of continuing the data collection for the CDC National HIV Surveillance System (NHSS) published in the Federal Register on September 30, 2025, Volume 90, Number 187, Pages 46891-46893 (Docket No. CDC-2025-0519).

CDC acknowledges your comments emphasizing the importance of NHSS as a national surveillance asset and its role in monitoring HIV trends, outcomes across the care continuum, and disparities among populations disproportionately affected by HIV, including Black communities and individuals experiencing structural vulnerabilities. Your perspective on the utility of population-based surveillance data for evaluating local and national HIV initiatives is noted.

Your comment regarding burden estimates and variations in the state and local reporting capacity are acknowledged. In collaboration with health department partners, CDC continues to assess reporting processes to support timely and complete data submission within existing statutory and resource constraints.

CDC has also noted your recommendations related to enhancing demographic, risk, and social context variables within NHSS. As with other federal surveillance systems, NHSS data collection adheres to Office of Management and Budget (OMB) standards and applicable federal policies to ensure consistency, data quality, and protection of individual privacy. In addition to NHSS, CDC's HIV surveillance portfolio includes the National HIV Behavioral Surveillance System (NHBS) and the Medical Monitoring Project (MMP). Together, these systems provide a comprehensive perspective on HIV trends, related behaviors, prevention services, clinical outcomes, quality of care, and barriers to care and viral suppression among people with diagnosed HIV and populations disproportionately affected by HIV. Local jurisdictions may collect additional information beyond federally required elements to meet programmatic and analytic needs within their respective authorities.

Your comments addressing information collection costs, infrastructure capacity, and the use of automated and digital reporting tools are acknowledged. CDC continues to support HIV surveillance activities through cooperative agreements and grants to support critical public health infrastructure, ongoing technical assistance and system improvements designed to enhance efficiency and data quality across state and local HIV surveillance programs.

Finally, CDC recognizes your comments regarding the importance of NHSS for public health research and monitoring of HIV trends and outcomes at the population level. NHSS remains a foundational system for informing national surveillance, prevention, care and response efforts.

Your perspectives are valuable as CDC reviews NHSS data collection. CDC appreciates your engagement in the public comment process and your continued interest in strengthening HIV surveillance to inform public health action.

Sincerely,

HIV Surveillance Branch
Division of HIV Prevention
Centers for Disease Control and Prevention
Department of Health and Human Services

Naomi Gaspard
Policy Manager
The AIDS Institute
17 Davis Blvd.
Tampa, FL 33606

Subject: Response to Comments on NHSS Docket No. 2025-18904

Dear Naomi Gaspard,

On behalf of the Centers for Disease Control and Prevention (CDC), thank you for your comments made in support of continuing the data collection for the CDC National HIV Surveillance System (NHSS) published in the Federal Register on September 30, 2025, Volume 90, Number 187, Pages 46891-46893 (Docket No. CDC-2025-0519).

Your comments regarding the importance of NHSS data informing outreach, prevention, and resource allocation efforts at the state and local level, and the role of national HIV surveillance in monitoring HIV trends, prevalence, and viral suppression, and in supporting federal initiatives are noted.

CDC acknowledges your emphasis on the importance of data timeliness and completeness to support rapid public health response, including outbreak detection and coordination across jurisdictions. NHSS continues to support these functions through standardized reporting, laboratory data integration, and collaboration with state and local health departments to improve data quality and reporting efficiency.

Your comments regarding the need to maintain community trust, safeguard confidentiality, and ensure surveillance data are used exclusively for public health purposes are noted. NHSS data are covered by an Assurance of Confidentiality under Section 308(d) of the Public Health Service Act. CDC is committed to maintaining strong data security protections and transparent communication regarding the purpose and use of surveillance data.

CDC also acknowledges your recommendation to ensure appropriate access to NHSS data in ways that support transparency, accountability, and public health action. CDC is committed to making data available to the extent allowable by law, within its authority under the Assurance of Confidentiality, and in accordance with data re-release policies, while protecting individual privacy.

Your perspectives are valuable as CDC reviews NHSS data collection. CDC appreciates your continued engagement, thoughtful input on the National HIV Surveillance System and your ongoing commitment to end HIV in the United States.

Sincerely,

HIV Surveillance Branch
Division of HIV Prevention
Centers for Disease Control and Prevention (CDC)
Department of Health and Human Services

Jen Laws, President & CEO
Community Access National Network (CANN)
PO Box 3009
Slidell, LA 70459

Subject: Response to Comments on NHSS Docket No. 2025-18904

Dear Jen Laws and Ranier Simons,

On behalf of the Centers for Disease Control and Prevention (CDC), thank you for your comments made in support of continuing the data collection for the CDC National HIV Surveillance System (NHSS) published in the Federal Register on September 30, 2025, Volume 90, Number 187, Pages 46891-46893 (Docket No. CDC-2025-0519).

Your comments underscoring the importance of continued national HIV surveillance and the role of NHSS in supporting Ending the HIV Epidemic efforts are noted. The value of standardized, population-based surveillance data for monitoring trends over time, identifying geographic and demographic disparities, and informing federal, state, and local public health planning are recognized.

Your comments regarding confidentiality protections and data governance are acknowledged. NHSS data are covered by an Assurance of Confidentiality under Section 308(d) of the Public Health Service Act. CDC maintains policies governing authorized access, data security, and use of surveillance data exclusively for public health purposes. CDC is committed to maintaining community trust and strong safeguards to protect sensitive health information.

CDC acknowledges your comments related to social determinants of health, data timeliness, clarity of reporting, and the resource needs of state and local health departments. CDC funds state and local health department surveillance and prevention programs that support whole-person approaches to HIV prevention and care. These programs incorporate syndemic approaches and consider social and structural factors that create barriers to HIV prevention and care services. In addition, state and local HIV surveillance programs collect surveillance data in accordance with state laws and regulations and established standards. CDC provides technical guidance, training, and analytic support to ensure appropriate use and interpretation of NHSS data.

Your perspectives are valuable as CDC reviews NHSS data collection. CDC appreciates your thoughtful comments and commitment to end HIV in the United States.

Sincerely,

HIV Surveillance Branch
Division of HIV Prevention

Centers for Disease Control and Prevention (CDC)
Department of Health and Human Services

AIDSVu
Rollins School of Public Health
1518 Clifton Rd. NE
Atlanta, GA 30322

Subject: Response to Comments on NHSS Docket No. 2025-18904

Dear Colleagues at AIDSVu,

On behalf of the Centers for Disease Control and Prevention (CDC), thank you for your comments made in support of continuing the data collection for the CDC National HIV Surveillance System (NHSS) published in the Federal Register on September 30, 2025, Volume 90, Number 187, Pages 46891-46893 (Docket No. CDC-2025-0519).

Your comments noting NHSS as a foundational source of standardized, population-based HIV data are acknowledged. The importance of consistent national surveillance to support monitoring HIV incidence, prevalence, viral suppression, and geographic trends, as well as informing progress toward national goals is recognized.

CDC acknowledges your comment emphasizing the value of timely and complete data to identify HIV clusters and supporting a rapid public health response. CDC continues to work with state and local health departments to improve data quality and timeliness while balancing feasibility, data integrity, and resource considerations across jurisdictions.

Your recommendations regarding the incorporation of contextual information related to social and community factors, as well as expanded geographic and demographic detail, are noted. CDC collects and reports surveillance data in accordance with Office of Management and Budget (OMB) standards and applicable federal policies to ensure consistency, data quality, and protection of confidentiality. CDC acknowledges the comment related to the contribution of social and community factors affecting health and of the role of social determinants of health (SDOH) to the transmission and spread of communicable diseases. CDC funds health department surveillance and prevention programs to ensure support for whole-person approaches to HIV prevention and care including syndemic approaches and consideration of social and structural factors that create barriers to HIV prevention and care services. State and local HIV surveillance programs are encouraged to analyze SDOH and comorbidity data to address local syndemics and maximize impact of public health programs.

CDC also acknowledges your comments regarding the importance of transparency and accessibility of surveillance data. NHSS national products, technical documentation, and public-facing tools support a broad audience, including policymakers, researchers, and community partners. CDC is committed to maintaining clarity around methods, limitations, and appropriate interpretation of surveillance data.

Your perspectives are valuable as CDC reviews NHSS data collection. CDC appreciates your thoughtful comments and commitment to end HIV in the United States.

Sincerely,

HIV Surveillance Branch
Division of HIV Prevention
Centers for Disease Control and Prevention (CDC)
Department of Health and Human Services

Human Rights Campaign
1640 Rhode Island Ave. N.W.
Washington, DC 20036

Subject: Response to Comments on NHSS Docket No. 2025-18904

Dear Colleagues at Human Rights Campaign,

On behalf of the Centers for Disease Control and Prevention (CDC), thank you for your comments made in support of continuing the data collection for the CDC National HIV Surveillance System (NHSS) published in the Federal Register on September 30, 2025, Volume 90, Number 187, Pages 46891-46893 (Docket No. CDC-2025-0519).

Your comments highlight the importance of standardized, timely, and protected HIV surveillance data in informing federal programs, monitoring population-level trends, and supporting implementation of national efforts to end HIV in the United States. CDC recognizes the role that surveillance data play in informing resource allocation, monitoring outcomes, and supporting coordination across jurisdictions.

CDC acknowledges the importance of national consistency in surveillance practices, modernization of data systems, and the maintenance of strong privacy and confidentiality protections. NHSS data are covered by an Assurance of Confidentiality under Section 308(d) of the Public Health Service Act. CDC is committed to ensuring that surveillance data are collected, stored, and used solely for public health purposes in accordance with applicable federal law and policy.

Your comments regarding sexual orientation and gender identity data collection, interoperability, data accessibility, and protections against misuse or criminalization of surveillance data are noted. CDC continues to balance the need for high-quality, actionable surveillance data with the responsibility to protect individual privacy and maintain community trust.

The recommendation for CDC to implement a standardized approach to collecting gender identity and sexual orientation is acknowledged. As a federal agency, CDC must comply with federal directives. In 2025, CDC removed gender identity and modified the collection of sex on the Adult/Adolescent and Pediatric Case Report forms in accordance with Executive Order 14168.

CDC appreciates the opportunity to receive input from organizations engaged in civil rights advocacy and public health. Public comments such as yours contribute to ongoing efforts to ensure that NHSS remains a reliable and effective component of the nation's HIV surveillance infrastructure.

Sincerely,

HIV Surveillance Branch
Division of HIV Prevention
Centers for Disease Control and Prevention (CDC)
Department of Health and Human Services

Council of State and Territorial Epidemiologists
Janet Hamilton MPH
Executive Director
Council of State and Territorial Epidemiologists
Email: letters@cste.org

Subject: Response to Comments on NHSS Docket No. 2025-18904

Dear Ms. Hamilton,

On behalf of the Centers for Disease Control and Prevention (CDC), thank you for your comments made in support of continuing the data collection for the CDC National HIV Surveillance System (NHSS) published in the Federal Register on September 30, 2025, Volume 90, Number 187, Pages 46891-46893 (Docket No. CDC-2025-0519).

The Council of State and Territorial Epidemiologists' (CSTE) endorsement of NHSS and recognition of its critical role in informing HIV prevention, care, and public health decision-making at all levels is acknowledged. The emphasis on the importance of robust surveillance data to guide science-based policy and improve health outcomes aligns with CDC's mission to protect the health and safety of all Americans.

The feedback regarding the burden estimates and the essential contributions of state, tribal, local, and territorial (STLT) health departments is recognized. CDC remains committed to supporting STLT partners through cooperative agreements and ongoing efforts to modernize public health data systems. Timely, secure, and coordinated data sharing is recognized as essential to achieving national goals, including Ending the HIV Epidemic in the U.S.

CDC recognizes the value of continued partnership with CSTE for strong public health surveillance. Ongoing collaboration with CSTE and its members is essential to advance HIV prevention and improve health outcomes nationwide.

Your perspectives are valuable as CDC reviews the proposed data collection for NHSS. CDC appreciates your comments in support of NHSS data collection and the continued commitment to end HIV in the United States.

Sincerely,

HIV Surveillance Branch
Division of HIV Prevention
Centers for Disease Control and Prevention
Department of Health and Human Services

Stephen Lee, MD, MBA, DHSM
Executive Director
NASTAD
444 North Capitol Street NW, Suite 339
Washington, DC 20001

Subject: Response to Comments on NHSS Docket No. 2025-18904

Dear Dr. Lee,

On behalf of the Centers for Disease Control and Prevention (CDC), thank you for your comments made in support of continuing the data collection for the CDC National HIV Surveillance System (NHSS) published in the Federal Register on September 30, 2025, Volume 90, Number 187, Pages 46891-46893 (Docket No. CDC-2025).

Your comments underscore the critical role NHSS plays in guiding public health action, informing programmatic decisions, and supporting federal initiatives such as the Ryan White HIV/AIDS Program and the Housing Opportunities for Persons with AIDS program and point to the importance of ensuring that NHSS remains a cornerstone of the national HIV response. Data modernization efforts are a CDC priority. As you noted, improving system interoperability, streamlining reporting processes, and enhancing workforce capacity are essential to maintaining the integrity and utility of surveillance data. CDC remains committed to advancing these priorities through data modernization initiative efforts and ongoing collaboration with health departments and stakeholders.

CDC also recognizes the importance of reducing administrative burden and ensuring that surveillance systems are not only efficient but also responsive to the evolving needs of jurisdictions. Your comment regarding the need for continued investment in training, staffing, and technical support in health departments to maintain data integrity and consistency are acknowledged. Your comments are noted and acknowledged as supporting CDC goals to enhance situational awareness, accelerate outbreak response, and efficient resource allocation.

Your perspectives are valuable as CDC reviews the proposed data collection for NHSS. CDC looks forward to continued collaboration with NASTAD as we work to strengthen HIV surveillance and improve public health outcomes nationwide. CDC appreciates your comments in support of NHSS data collection and continued commitment to end HIV in the United States.

Sincerely,

HIV Surveillance Branch
Division of HIV Prevention
Centers for Disease Control and Prevention
Department of Health and Human Services

HIV Prevention Action Coalition (HPAC)
Kevin Herwig, Mike Weir, and Nick Armstrong
Co-Chairs, HIV Prevention Action Coalition (HPAC)

[Email: HPAC co-chairs: Kevin Herwig (kherwig@hivhep.org), Mike Weir (mweir@NASTAD.org), and Nick Armstrong (NArmstrong@taimail.org).]

Subject: Response to Comments on NHSS Docket No. 2025-18904

Dear Mr. Herwig, Mr. Weir, and Mr. Armstrong, and fellow endorsers

On behalf of the Centers for Disease Control and Prevention (CDC), thank you and the HIV Prevention Action Coalition endorsing organizations for your comments made in support of continuing the data collection for the CDC National HIV Surveillance System (NHSS) published in the Federal Register on September 30, 2025, Volume 90, Number 187, Pages 46891-46893 (Docket No. CDC-2025-0519).

The recognition of NHSS as a foundational element of the nation's public health infrastructure and your strong support for continued investment in its modernization, efficiency, and security is acknowledged. Your emphasis on the importance of timely, comprehensive, and high-quality surveillance data aligns closely with CDC's priorities and ongoing efforts to strengthen HIV prevention and care nationwide.

The comments on the role of NHSS in supporting community-based organizations and clinical providers, and your call for robust, nationally representative data to guide equitable resource allocation are noted. Your comments reinforce the critical need for a unified approach to surveillance and the importance of collaboration across jurisdictions and sectors. CDC is committed to protecting the privacy and safety of individuals affected by HIV. CDC understands the importance of protecting individuals' privacy and has put strong security measures in place to ensure that HIV data are protected at CDC and in health departments. CDC recognizes that strong, consistently applied data protections are essential to building trust with communities and ensuring that surveillance data are used solely for public health purposes. Finally, CDC acknowledges your recommendations to reduce administrative burden and improve system interoperability. CDC is committed to data system modernization, and to working with partners to ensure that surveillance systems support timely public health action.

Your perspectives are valuable as CDC reviews the proposed data collection for NHSS. CDC appreciates your comments in support of continuing the data collection for NHSS and continued commitment to end HIV in the United States.

Sincerely,

HIV Surveillance Branch
Division of HIV Prevention
Centers for Disease Control and Prevention
Department of Health and Human Services

Grant T. Callen, MD
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Subject: Response to Comments on NHSS Docket No. 2025-18904

Dear Dr. Callen and Dr. Sanders,

On behalf of the Centers for Disease Control and Prevention (CDC), thank you for your comments made in support of continuing the data collection for the CDC National HIV Surveillance System (NHSS) published in the Federal Register on September 30, 2025, Volume 90, Number 187, Pages 46891-46893 (Docket No. CDC-2025-0519).

Your insights as Adolescent Medicine HIV Specialists and recognition of the critical role that NHSS plays in understanding HIV are acknowledged. Your emphasis on the importance of NHSS data in identifying disparities, guiding targeted interventions, and improving outcomes for adolescents and young adults underscores the importance of maintaining a robust surveillance system are noted. CDC is committed to effectively monitor trends and allocate resources to support HIV prevention and care services.

CDC acknowledges your comments regarding to NHSS data informing both prevention and treatment strategies, and your work addressing the disproportionate burden of HIV among Black/African American and Hispanic/Latino youth.

Your perspectives are valuable as CDC reviews the proposed data collection for NHSS. CDC appreciates your comments in support of continuing the data collection for NHSS and continued commitment to end HIV in the United States.

Sincerely,

HIV Surveillance Branch
Division of HIV Prevention
Centers for Disease Control and Prevention
Department of Health and Human Services

NMAC
1000 Vermont Ave, NW, Suite 200
Washington, DC 20005

Subject: Response to Comments on NHSS Docket No. 2025-18904

Dear Colleagues at NMAC,

On behalf of the Centers for Disease Control and Prevention (CDC), thank you for your comments made in support of continuing the data collection for the CDC National HIV Surveillance System (NHSS) published in the Federal Register on September 30, 2025, Volume 90, Number 187, Pages 46891-46893 (Docket No. CDC-2025-0519).

As a cornerstone of the Federal response, NHSS informs programs and initiatives such as the Ending the HIV Epidemic initiative, Ryan White HIV/AIDS Program funding, and health system planning at all levels, which rely on the quality and timeliness of NHSS data. NHSS provides robust HIV surveillance data that supports these efforts. Within its control and authority, CDC is committed to making surveillance data as useful and actionable as possible for jurisdictions. In this context, it is essential that the level of detail provided in publications and releases maximizes the utility of data while ensuring the protection of privacy.

The comment regarding the need for more disaggregated data on race and ethnicity is acknowledged. CDC adheres to the Office of Management and Budget (OMB) standards for race and ethnicity classifications, which provide a consistent framework for data reporting and allows for a standardized presentation of data while protecting privacy. In addition to required categories, expanded race and ethnicity information may be collected locally to capture a broader spectrum of racial and ethnic identities. State and local health departments can analyze this expanded data to address their specific needs and tailor interventions, facilitating deeper insights and nuanced understanding of health disparities.

The recommendation for CDC to implement a standardized approach to collecting gender identity and sexual orientation across all jurisdictions is acknowledged. As a federal agency, CDC must comply with federal directives. In 2025, CDC removed gender identity and modified the collection of sex on the Adult/Adolescent and Pediatric Case Report forms in accordance with Executive Order 14168.

The comment regarding the aging population of people living with HIV is noted. Decades of effort have contributed to the ability of people with HIV to live longer, approaching the lifespan of people without HIV. CDC has revised its categories of reporting age to include older age groups providing greater granularity at the national level.

The contribution of social determinants of health (SDOH) to the transmission and spread of communicable diseases is well recognized. CDC funds health department surveillance and prevention programs to support whole person approaches to HIV prevention and care including syndemic approaches and consideration of social and structural factors that create barriers to HIV prevention and care services. State and local health departments are encouraged to analyze SDOH and comorbidity data to address local syndemics and maximize impact of public health programs.

The importance of security and protection of HIV data is recognized, and community trust is essential for effective public health initiatives. CDC understands the importance of protecting individuals' privacy and has put strong security measures in place to ensure that HIV data are protected at CDC and health departments. As a condition of receiving CDC HIV prevention funding, state and local health departments must comply with strict standards for [data security](#). Additionally, HIV data held at CDC are strongly protected by an [Assurance of Confidentiality](#) under Section 308(d) of the Public Health Service Act. The Assurance of Confidentiality guarantees that all information is held in strict confidence; used only for the purposes stated in the Assurance of Confidentiality; will not otherwise be disclosed or released without the consent of the individual or institution; and that this protection lasts forever, including after death. CDC recognizes that strong, consistently applied data protections are essential to building trust with communities and ensuring that surveillance data are used solely for public health purposes.

Finally, community and partner involvement is essential for the ongoing support of NHSS. CDC is committed to expanding mechanisms to obtain input on surveillance activities and to make surveillance data widely accessible to the extent permitted by law and HIV data re-release policies.

Your perspectives are valuable as CDC reviews the proposed data collection for NHSS. CDC appreciates your support of NHSS data collection and continued commitment to end HIV in the United States.

Sincerely,

HIV Surveillance Branch
Division of HIV Prevention
Centers for Disease Control and Prevention
Department of Health and Human Services

Carol-Ann Swain
AIDS Institute, New York State Department of Health
Albany, NY 12237

Subject: Response to Comments on NHSS Docket No. 2025-18904

Dear Dr. Swain and Colleagues at the New York State Department of Health,

On behalf of the Centers for Disease Control and Prevention (CDC), thank you for your comments made in support of continuing the data collection for the CDC National HIV Surveillance System (NHSS) published in the Federal Register on September 30, 2025, Volume 90, Number 187, Pages 46891-46893 (Docket No. CDC-2025-0519).

The strong support for NHSS and the recognition of its critical role in guiding HIV prevention, care, and public health response are noted. Your emphasis on the importance of comprehensive and timely surveillance data is well aligned with CDC's mission to protect and improve health outcomes nationwide.

Your concerns regarding confidentiality, public trust, and the scope of data collection are acknowledged. CDC takes these concerns seriously and has implemented multiple layers of protection to safeguard sensitive HIV surveillance data. These include:

- **Legal protections** of an Assurance of Confidentiality under section 308(d) of the Public Health Service Act, which prohibits unauthorized disclosure of identifiable information and ensures that data are used solely for public health purposes.
- **Standard operating procedures (SOPs)** that strictly limit access to HIV surveillance data to authorized personnel and govern secure data handling, storage, and transmission.
- **Data release agreements with state health departments**, which outline clear protocols for data sharing and are designed to prevent inadvertent disclosure of sensitive information.
- **Rigorous review processes** to ensure that any public release of data, especially those involving small geographic areas or detailed demographic categories, does not compromise an individual's confidentiality.

The comment regarding the limitations of surveillance systems in capturing social determinants of health is also noted.

Your perspectives are valuable as CDC reviews the proposed data collection for NHSS. CDC appreciates your support of NHSS data collection, your dedication to protecting the health and privacy of individuals affected by HIV, and your continued commitment to end HIV in the United States.

Sincerely,

HIV Surveillance Branch
Division of HIV Prevention
Centers for Disease Control and Prevention
Department of Health and Human Services

AIDS Healthcare Foundation
700 SE 3rd Ave.
Fort Lauderdale, FL 33316

Subject: Response to Comments on NHSS Docket No. 2025-18904

Dear Colleagues at AIDS Healthcare Foundation,

On behalf of the Centers for Disease Control and Prevention (CDC), thank you for your comments made in support of continuing the data collection for the CDC National HIV Surveillance System (NHSS) published in the Federal Register on September 30, 2025, Volume 90, Number 187, Pages 46891-46893 (Docket No. CDC-2025-0519).

Your comments underscore the importance of disease surveillance as a core public health function and recognize NHSS as a critical tool for understanding HIV epidemiology, monitoring trends, and informing prevention and care strategies. CDC notes your observations regarding the value of surveillance data in supporting local decision-making, resource allocation, and targeted service delivery in communities most impacted by HIV.

CDC also acknowledges your recommendation regarding the availability of more granular geographic data to support local policy and programmatic efforts. All surveillance and surveillance-related data collected and maintained by NHSS, must be managed, presented, published and released in accordance with principles and guidelines for confidentiality, security and data release. These principles and guidelines must be strictly followed as geographic and small-cell data may be indirectly identifying when combined with other detailed information. Within its control and authority, CDC is committed to making surveillance data as useful and actionable as possible for jurisdictions. In this context, it is essential that the level of detail provided in publications and releases maximizes the utility of data while ensuring the protection of privacy.

Your perspectives are valuable as CDC reviews the proposed data collection for NHSS. CDC appreciates your support of NHSS data collection and continued commitment to end HIV in the United States.

Sincerely,

HIV Surveillance Branch
Division of HIV Prevention
Centers for Disease Control and Prevention
Department of Health and Human Services

Mr. Brandon M. Macsata
ADAP Advocacy
PO Box 846
Nags Head, NC 27959

Subject: Response to Comments on NHSS Docket No. 2025-0519

Dear Mr. Macsata,

On behalf of the Centers for Disease Control and Prevention (CDC), thank you for your comments made in support of continuing the data collection for the CDC National HIV Surveillance System (NHSS) published in the Federal Register on September 30, 2025, Volume 90, Number 187, Pages 46891-46893 (Docket No. CDC-2025-0519). CDC appreciates ADAP Advocacy's strong endorsement of NHSS and its recognition of the system's critical role in guiding evidence-based public health interventions.

Your observations highlight key priorities that align with CDC's mission: affirming the scientific validity and practical utility of NHSS data for identifying clusters, monitoring trends, and informing timely public health responses, and ensuring continuity of operational capacity to maintain a robust surveillance infrastructure. These priorities are essential to sustaining effective HIV prevention and care efforts nationwide.

We share your commitment to sustaining NHSS as an essential component of the national HIV response. The examples you cited, including the Scott County and West Virginia outbreaks, illustrate the value of timely and accurate surveillance data in preventing and mitigating HIV transmission. CDC remains dedicated to advancing surveillance methodologies that meet the highest scientific standards and to ensuring that data collection efforts remain efficient, actionable, and responsive to public health needs.

Thank you again for your comments. Your perspective is valuable as CDC considers NHSS data collection going forward. CDC appreciates your support for NHSS data collection and continued commitment to improving health outcomes for people living with HIV nationwide.

Sincerely,

HIV Surveillance Branch
Division of HIV Prevention
Centers for Disease Control and Prevention (CDC)
Department of Health and Human Services