



January 20, 2026

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Information Collection Review Office
Centers for Disease Control and Prevention
1600 Clifton Road NE
Atlanta, Georgia 30329

Re: Docket No. CDC-2025-0753

On behalf of the HIV Prevention Action Coalition (HPAC), a workgroup of the Federal AIDS Policy Partnership, and the undersigned organizations, we submit these comments in strong support of the National HIV Behavioral Surveillance System (NHBS) and the continued need for sustained federal investment in timely, comprehensive, secure, and high-quality HIV behavioral surveillance data.

NHBS is a cornerstone of the nation's HIV response. It remains the only nationally representative, standardized system designed to collect critical behavioral and prevention-related data among populations disproportionately affected by HIV, including gay, bisexual, and other men who have sex with men; people who inject drugs; and heterosexuals vulnerable to HIV transmission across the lifespan. These data provide essential context that case surveillance alone cannot capture, including information on access to prevention services, testing behaviors, social determinants of health, and barriers to care.

We support continued investment in modernizing NHBS to ensure the system remains adaptive, efficient, and secure. Modernized data collection and management systems improve data quality and timeliness, enhance analytic capacity, and strengthen the ability of health departments to respond rapidly to emerging HIV outbreaks. Improvements in system interoperability and standardized processes also promote coordination across jurisdictions, supporting a more efficient use of limited public health resources.

Timely behavioral surveillance data are critical to identifying concerning trends and informing prevention and care strategies. Delays or gaps in NHBS data collection weaken situational awareness and limit the ability of health departments and community partners to deploy evidence-based interventions, adjust prevention strategies, and communicate effectively with

neighboring jurisdictions and federal partners. Near–real–time access to high-quality behavioral data allows for earlier intervention, reduces the likelihood of broader transmission, and mitigates long-term public health and financial impacts.

Health departments have made significant investments in building and sustaining a skilled surveillance workforce capable of implementing NHBS with rigor. Continued federal support for staffing, training, and technical assistance is essential to maintaining data integrity, completeness, and consistency across jurisdictions. Importantly, no amount of local innovation can replace a federally led, standardized, and nationally representative behavioral surveillance system. Health departments cannot fill gaps created by uneven or diminished national data collection, and fragmented approaches undermine national situational awareness and federal oversight. A unified federal approach is essential to identifying emerging threats early and coordinating effective responses.

NHBS data inform a wide range of public health activities at the federal, state, and local levels. Health departments and community-based organizations rely on NHBS findings to design and evaluate HIV prevention strategies, tailor outreach and education efforts, and address barriers to testing, pre-exposure prophylaxis (PrEP), and care. A robust national sample is necessary to ensure equitable resource distribution and accurately assess progress toward federal HIV goals. Reliable behavioral data help ensure that limited federal dollars are directed where they can have the greatest impact. NHBS data ensure we are good stewards of taxpayer funding and deliver a strong return on investment.

HPAC acknowledges the limited NHBS-Trans activities conducted in select project areas and emphasizes the importance of preserving and expanding opportunities for jurisdictions to collect meaningful data among transgender people—particularly transgender people of color—whose needs are often underrepresented in national data systems.

We also emphasize the importance of protecting participant confidentiality and maintaining trust with communities disproportionately impacted by HIV. NHBS relies on voluntary participation and individuals' willingness to share sensitive information. Strong data protections, clear privacy safeguards, and transparent communication about data use are crucial for sustaining participation and maintaining data quality. Any changes to data collection methods or systems must prioritize confidentiality and minimize the risk of misuse or re-identification.

In addition, we support efforts to enhance efficiency within NHBS, reducing the administrative burden on health departments while preserving data quality and utility. Streamlining data collection processes, improving interoperability with other public health data systems, and

providing clear, consistent guidance can help jurisdictions allocate their limited capacity to public health actions rather than duplicative administrative tasks. Reducing unnecessary burden while maintaining rigorous standards aligns with the goals of the Paperwork Reduction Act and strengthens the overall effectiveness of the system.

We commend the Centers for Disease Control and Prevention for its leadership in supporting NHBS and for its continued engagement with state and local partners. Ongoing collaboration and sustained investment in modernization, workforce capacity, data protection, timeliness, and efficiency are critical to ensuring that NHBS remains a foundational component of the nation's HIV prevention and surveillance infrastructure.

If you have any questions regarding these comments, please do not hesitate to contact the HPAC co-chairs: Kevin Herwig (kherwig@hivhep.org), Mike Weir (mweir@NASTAD.org), and Nick Armstrong (narmstrong@taimail.org).

Endorsements

AIDS Action Baltimore

AIDS Foundation Chicago

Association of Nurses in AIDS Care

Equality California

Equitas Health

Georgia AIDS Coalition

HIV+Hepatitis Policy Institute

HIV Medicine Association

International Association of Providers of AIDS Care

NASTAD

National Alliance for HIV Education and Workforce Development

National HIV Aging Advocacy Network (NHAAN)

NC AIDS Action Network

NMAC

PrEP4All

SAGE

San Francisco AIDS Foundation

The AIDS Institute

Transcanwork

Treatment Action Group (TAG)