



December 1, 2025

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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-2025-0519

On behalf of the HIV Prevention Action Coalition (HPAC) and undersigned organizations, we submit these comments to emphasize the crucial role of the National HIV Surveillance System (NHSS) and the necessity for sustained investment in timely, comprehensive, secure, and high-quality HIV surveillance data. The NHSS serves as a foundation of the nation's public health infrastructure and remains indispensable for monitoring trends, guiding prevention and care efforts, and evaluating progress toward ending the HIV epidemic in the United States.

We support continued investment in data modernization to ensure that the NHSS remains adaptive, efficient, and secure. Modernized data systems enhance data quality and timeliness, thereby strengthening the ability of health departments to respond rapidly to emerging HIV outbreaks. These advancements enhance coordination across jurisdictions and increase the overall efficiency and impact of HIV prevention and care programs.

Timely HIV surveillance data are crucial for detecting and responding to outbreaks. Delayed, inconsistent, or incomplete reporting undermines the ability of health departments to identify concerning trends, deploy prevention and care resources, and communicate with partner jurisdictions. Real-time or near-real-time data enhances situational awareness and facilitates earlier intervention, thereby reducing the likelihood of broader transmission and mitigating long-term public health and financial impacts.

Health departments across the country have strengthened their surveillance workforce to meet the growing demands of modern data systems and ensure high-quality reporting. Continued investments in staffing, training, and technical support are necessary to maintain data integrity, timeliness, and completeness. However, no amount of local innovation can replace federally led, standardized, and nationally representative data collection. Health departments cannot fill gaps

created by uneven or diminished national surveillance, and fragmented systems weaken national situational awareness and federal oversight. A unified federal approach is the only way to guarantee that emerging threats are detected early and that response efforts are coordinated and effective.

Community-based organizations (CBOs) and clinical providers rely on NHSS data to shape outreach strategies, tailor prevention and care programs, and identify where additional resources are needed to support people living with and affected by HIV. Accurate and timely data enables CBOs to design interventions that reflect the realities of the communities they serve and helps clinicians improve linkage to care, treatment adherence, and long-term health outcomes. Ensuring reliable, nationally representative surveillance data strengthens the entire HIV service delivery system—not only health departments but also the community partners and clinicians who depend on these data every day.

We also emphasize that investments in surveillance must be paired with strong, clear, and consistently applied data protections. Communities most affected by HIV face disproportionate criminalization, stigma, and discrimination, and the safety of their data is paramount. Federal leadership is critical to ensuring that surveillance information is protected from misuse, stored securely, shared appropriately, and used only for public health purposes. Strong data protections build trust with affected communities and strengthen the ability of health departments and community partners to engage people in prevention and care.

NHSS data informs an array of essential public health activities. Health departments and community partners rely on these data to educate communities about HIV, respond to and prevent transmission, and support tailored care and treatment programs. Federal agencies also rely on NHSS data to inform key programs, such as the Ryan White HIV/AIDS Program and the Housing Opportunities for Persons with AIDS (HOPWA) program. A robust national sample is essential to ensure equitable resource allocation and accurately assess progress toward federal HIV goals. Reliable national data also ensures that federal dollars are directed where they can have the greatest impact, allowing agencies to target gaps, scale effective interventions, and avoid wasting limited resources.

The undersigned organizations also emphasize the importance of enhancing efficiency within the NHSS to alleviate the administrative burden on health departments. Streamlining data collection processes, strengthening system interoperability, and providing clear guidance allows jurisdictions to focus limited resources on public health action. Timely and complete data also supports faster response to new HIV transmissions and more agile program implementation.

We commend the Centers for Disease Control and Prevention for its leadership in supporting NHSS. Continued collaboration and investment in modernization, workforce capacity, data protections, timeliness, and efficiency will ensure that the NHSS remains a foundation of the nation's HIV response.

If you have any questions regarding this letter, 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).

Endorsers

AIDS Alabama

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AVAC

Community Access National Network

DAP Health

Five Horizons Health Services

HealthHIV

HIV+Hepatitis Policy Institute

HIV Medicine Association

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Southern Black Policy and Advocacy Network

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