



National Association of County & City Health Officials

The National Connection for Local Public Health

COMMENTS OF THE NATIONAL ASSOCIATION OF COUNTY AND CITY HEALTH OFFICIALS

On the Request for Comments on

Infectious Diseases and Circumstances Relevant to Notification Requirements

Docket Number NIOSH-219

February 10, 2011

The National Association of County and City Health Officials (NACCHO) is pleased to submit the following comments on the Centers for Disease Control and Prevention (CDC) request for comments on the matter referenced above.

NACCHO represents the nation's 2800 local health departments. These city, county, metropolitan, district and tribal departments work every day to ensure the conditions that promote health and equity, combat diseases, and improve the quality and length of all lives for all people in their communities through public health policies and services. Local health departments in particular have unique roles and responsibilities in the larger health system and within every community. They are the only local entities that focus on the health and well being of every person in their communities. They work from a population-wide perspective. They have statutory powers that enable their role and enshrine a duty to serve every person and household in their jurisdiction.

Local health departments have long experience in infectious disease control, including disease surveillance and notification. The purpose of these comments is to ask that CDC remain mindful of Congressional intent with respect to the notification requirements as articulated in House Report 111-305. The report says, "Because states and localities have their own requirements for infectious disease surveillance, prevention, investigation, and control, the Committee expects that in developing the disease list under this section, the Secretary will consult as appropriate with state and local governmental public health authorities, and work to optimize efficiency and coordination with state and local procedures."

Local and state public health officials have the authority and responsibility to determine the appropriate course of action with respect to infectious disease exposures. They respond aggressively to reports of immediately life-threatening infectious disease. As the House Report noted, the notification requirements established by Public Law 111-87, which apply only to exposures that may have been incurred by emergency response employees, coexist with current state and local requirements for all notifiable disease reporting. NACCHO recommends that the list and proposed guidance be accompanied by a statement to that effect. The guidelines should specify that state and local requirements and guidance should be consulted and used where the federal guidelines do not adequately address a particular circumstance and where the state and local requirements are more expansive than the federal list of diseases and guidance.

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