April 5, 2011

CDC Desk Officer  
Office of Management and Budget  
Washington, DC 20503


The Center for Science in the Public Interest (CSPI)\(^1\) supports the collection of environmental data from foodborne illness outbreak environmental assessments at the national level, as proposed by the Centers for Disease Control.\(^2\) The Office of Management and Budget should approve this data collection. Understanding the review is a requirement of the Paperwork Reduction Act, which has as its purpose minimizing the burdens imposed and assuring the greatest public benefit from information collected by the government,\(^3\) CSPI offers the following comment.

The study proposed by CDC would provide more timely data on the causes of outbreaks, including environmental factors associated with them. Such data is essential to efforts at improving response to outbreaks and for preventing future outbreaks. This will have tremendous benefit to the public, which bears the direct health and financial consequences of outbreaks, and to State, local, tribal and territorial governments that will be tasked with providing the data.

Various studies have quantified the burden of foodborne illnesses as ranging from billions to hundreds of billions of dollars.\(^4\) One reason for the range of estimates is the lack of adequate epidemiological data for estimating illness rates and limited information attributing disease to particular foods.\(^5\) Data collection to date is not adequate to permit CDC and the States to understand the scope of the foodborne illness burden and coordinate activities to prevent

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\(^1\) CSPI is a nonprofit health advocacy and education organization focused on food safety, nutrition, and alcohol issues. CSPI is supported principally by the 900,000 subscribers to its Nutrition Action HealthLetter and by foundation grants. It accepts no government or industry funding. In the area of food safety, CSPI publishes annual attribution data on foodborne disease, generates periodic reports on foodborne disease to better inform public discourse on actions to alleviate the human and economic burden of these preventable illnesses, and works with policy makers to improve consumer protections afforded by food safety systems.


\(^3\) 44 U.S.C. § 3501.


outbreaks. Enclosed is CSPI’s recent report “All Over the Map” which is a 10 year review of outbreak reporting by the 50 States. Our study found that in some years, 70 percent of outbreaks reported to CDC by the States are not resolved, meaning information that could prevent future outbreaks is lost. Meanwhile, variability in reporting by the States results in a paucity of information that impedes efforts to prevent foodborne illness. The NVEAIS data collection would help fill gaps in current reporting, and since State programs often provide public healthcare services, it is reasonable to assume that savings will accrue to the States as they benefit from better assessments of the scope and impact of foodborne disease.

For this reason we believe the proposed data collection will produce benefits that outweigh any burden it may impose on States. We encourage OMB to approve the collection and for CDC to proceed expeditiously in the design and implementation of the program.

Sincerely,

David W. Plunkett
Senior Staff Attorney
Center for Science in the Public Interest

cc: Centers for Disease Control and Prevention

enclosure: All Over the Map