



STATE OF WASHINGTON
DEPARTMENT OF HEALTH
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Jeffrey M. Zirger, Lead
Information Collection Review Office,
Office of Public Health Ethics and Regulations
Centers for Disease Control and Prevention
1600 Clifton Road NE, MS H21-8
Atlanta, GA 30329

RE: Docket No. CDC-2025-0750; Proposed Data Collection project entitled Pregnancy Risk Assessment Monitoring System (PRAMS)

Dear Mr. Zirger:

The Washington State Department of Health (DOH) appreciates the opportunity to provide comments on the proposed extension of the Pregnancy Risk Assessment Monitoring System (PRAMS) data collection. DOH has served as a Centers for Disease Control and Prevention (CDC) PRAMS partner for more than three decades and strongly supports the continuation and strengthening of this critical maternal and child health surveillance system.

PRAMS has provided essential, population-based data on maternal and infant health in Washington state for over 30 years. The survey captures self-reported information on experiences before, during, and after pregnancy, including health care access and utilization; tobacco, alcohol, and opioid use; exposure to violence; mental health and discrimination; and infant care practices.

DOH urges the CDC to take the following action:

- Extend PRAMS data collection for an additional three years.
- Restore federal funding and staffing necessary to ensure consistent data collection, analysis, and production.
- Restore public and researcher access to PRAMS data to support evidence-based decision-making by researchers, clinicians, and public health professionals.

In Washington, PRAMS data are used by state and local health departments, Tribal partners, health systems, researchers, and policymakers to plan, implement, and evaluate programs and policies aimed at improving maternal and infant health outcomes and reducing morbidity and mortality. PRAMS is uniquely positioned to capture behavioral health indicators and postpartum context during a critical period, making it the only surveillance system that integrates these data elements at scale.

PRAMS data play a vital role in public health decision-making by:

- Identifying emerging needs and challenges faced by pregnant and postpartum populations.
- Informing interventions and policies designed to reduce maternal and infant morbidity and mortality.
- Providing longitudinal data that allow states and the federal government to assess trends, evaluate impact, and determine what strategies are working.

At the national level, CDC provides essential leadership and coordination for PRAMS, including maintaining standardized survey protocols, core questions, a dedicated data system with online response capability, and uniform data cleaning and weighting processes. This work requires sustained investment in knowledgeable federal staff to ensure data quality and consistency across all participating sites.

CDC has also historically played a critical role in producing and distributing PRAMS research data files. These publicly accessible datasets have enabled researchers, planners, and program implementers to leverage both state and national data to inform policy and practice. Over the past year, the removal of publicly available PRAMS data from the CDC website has created significant barriers to data access and placed unsustainable administrative burdens on individual states. Reactivating and maintaining the Automated Research File (ARF) portal is essential to ensure equitable, efficient access to past and future PRAMS data for researchers, clinicians, policymakers, and public health agencies.

DOH strongly urges CDC to extend PRAMS data collection for an additional three years and to restore the technical, staffing, and financial resources necessary to support this foundational maternal and child health surveillance system. Continued federal leadership and investment in PRAMS are essential to improving health outcomes for women, infants, and families in Washington state and across the nation.

Thank you for the opportunity to comment and for your continued partnership in advancing maternal and child health. If you have any questions, please contact Mike Ellsworth at Michael.Ellsworth@doh.wa.gov or the Director, Federal and Interstate Affairs for Governor Ferguson's Washington, D.C. office Rose Minor at Rose.Minor@gov.wa.gov

Sincerely,



Michele Roberts, MPH, MCHES
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