



STATE OF WASHINGTON  
DEPARTMENT OF HEALTH

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Olympia, Washington 98501*

January 20, 2026

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

RE: Docket No. CDC-2025-20582; Proposed Data Collection Submitted for Public Comment and Recommendations—National HIV Behavioral Surveillance System (NHBS)

Dear Mr. Zirger:

The Washington State Department of Health (DOH) appreciates the opportunity to comment on the proposed continuation of data collection for the National HIV Behavioral Surveillance System (NHBS). DOH strongly supports the continued federal investment in and implementation of NHBS and urges the Centers for Disease Control and Prevention (CDC) to maintain this critical surveillance system.

NHBS is a cornerstone of HIV surveillance in Washington state and nationally. It is one of the only systematic data sources that provides detailed information on HIV risk behaviors, service engagement, and social determinants of health among populations disproportionately affected by HIV, including men who have sex with men, people who inject drugs, and transgender women. These populations are not adequately represented in population-based surveys, yet they are essential to understanding the evolving dynamics of the HIV epidemic and related syndemic conditions.

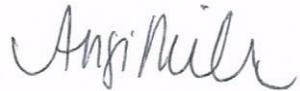
In Washington state, NHBS data are critical for guiding evidence-based public health action. The data inform resource allocation decisions, support the design and tailoring of HIV prevention and harm reduction programs, enable the identification of disparities, and allow for evaluation of progress toward state and federal HIV prevention goals. NHBS also represents a successful and longstanding partnership between federal, state, and local public health agencies. Washington state has participated in NHBS since 2003 and receives CDC funding to administer the program, with Public Health Seattle & King County conducting local implementation.

Ending or reducing federal funding for NHBS would effectively eliminate this surveillance system in Washington state and likely across the nation. Such an outcome would result in the loss of more than two decades of investment in infrastructure, workforce capacity, and community partnerships. It would also undermine the ability to conduct longitudinal analyses that are only possible through continuous data collection. Most importantly, it would leave HIV prevention and disease control programs without the timely, population-specific data necessary to respond to emerging trends and persistent inequities.

Washington state values the sustained federal commitment to NHBS and the role it plays in advancing data-driven public health practice. We strongly urge CDC to continue supporting NHBS to ensure states and local jurisdictions have the information needed to protect public health and reduce the burden of HIV among communities most affected.

Thank you for the opportunity to comment and for your continued partnership in advancing HIV surveillance and prevention. If you have any questions, please contact Mike Ellsworth at [Michael.Ellsworth@doh.wa.gov](mailto: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](mailto:Rose.Minor@gov.wa.gov)

Sincerely,



Angi Miller  
DCHS Acting Assistant Secretary  
Disease Control & Health Statistics  
Washington State Department of Health