



Request for Public Comment on Privacy, Confidentiality and Security Considerations for Data Collection and Use during a Public Health Emergency: Instructions for Submission

On September 14, 2020, the National Committee on Vital and Health Statistics (NCVHS), Subcommittee on Privacy, Confidentiality, and Security, will seek input from public health practitioners and other experts to explore data privacy and security in light of the COVID-19 Public Health Emergency (PHE). The Committee will use this input to inform the development and dissemination of a toolkit outlining methods and approaches to collect, use, protect, and share data responsibly during a pandemic or long-term nationwide PHE.

Objectives of this meeting are to:

- Understand current policies and practices involving data collection and use with respect to privacy and security during the COVID-19 PHE;
- Understand challenges and potential areas of clarification in light of these practices, new and emerging technology developments, and new and evolving policy directions;
- Identify best practices and areas where additional technical assistance or guidance may be useful.

The Committee requests comments from the public to inform the Committee's deliberations about data privacy and security considerations for data collection and use during a PHE in advance of this hearing and will consider them together with the oral input of subject matter experts at the hearing.

The Committee developed specific questions to ensure comments address key issues under consideration by the Committee. The Committee requests that commenters please use the questions provided here to frame and organize input. For general comments, please note this in your statement as well:

- a) What is the proper scope of data collection, analysis, and sharing in an emergency?
- b) What are fair information principles for a pandemic?
- c) What are best practices for properly cabining emergency authorities that supersede extant data protections?
- d) What data should organizations be collecting?
- e) What rules are all right to override to advance public health, and what should remain in force?
- f) What data rights may be contracted away, and what should remain inalienable?
- g) What level of identification of data is appropriate for which purposes?
- h) When is there a need for identifiable data?
- i) When is aggregate data more appropriate?
- j) Is case-level data without identifiers an adequate compromise?
- k) How do standards differ at the local / state / federal levels?

Send comments to NCVHSmal@cdc.gov no later than close of business, Wednesday, September 9, 2020.