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Submitted via the Federal Regulations Web Portal, <http://www.regulations.gov>

**RE: Pregnancy Risk Assessment Monitoring System (PRAMS);
Docket No. CDC-2025-0750**

We commend the Centers for Disease Control and Prevention (CDC) for continuing to address maternal health through the **Pregnancy Risk Assessment Monitoring System (PRAMS)** data collection. PRAMS is a cornerstone of maternal health data, providing critical insights that are not collected elsewhere. The release of this notice of proposed data collection further underscores CDC's commitment to improving maternal health outcomes by collecting critical data that informs maternal health initiatives at the local, state, and federal levels.

Despite sustained attention to the maternal health crisis, gaps still exist. Persistent disparities in maternal health outcomes, particularly among historically underserved communities, are exacerbated by outdated and incomplete data collection practices¹. The adoption of comprehensive, standardized data collection categories is crucial for improving data access, utilization, and supporting community-driven interventions.

We support the three-year extension of PRAMS data collection as a critical component of addressing disparities in maternal health outcomes. We also urge the CDC to adopt and promote the 2024 revised Office of Management and Budget (OMB) Statistical Policy Directive No. 15 (SPD 15) standards for the collection and use of race and ethnicity data. Standardizing race and ethnicity categories across federal programs, including PRAMS, is foundational to identifying disparities, improving health outcomes, and advancing health equity². Incorporating SPD 15 standards in PRAMS will enhance the quality and utility of PRAMS data, ensuring that all survey respondents are fully and accurately represented in the data that is collected.

Inclusion of the updated OMB SPD 15 categories into PRAMS data collection will promote consistency across other federal data collection initiatives, especially on maternal health, and support CDC's broader goals to improve maternal health in the United States. Further, adoption

¹ [The Issues of Interoperability and Data Connectedness for Public Health - PMC](#)

² [Data Standards - Tools and Technologies for Registry Interoperability, Registries for Evaluating Patient Outcomes: A User's Guide, 3rd Edition, Addendum 2 - NCBI Bookshelf](#)

of these standards will create alignment with state government and private sector data collection as the deadline for adoption of the new SPD 15 categories draws closer.

We respectfully urge CDC to integrate the revised OMB SPD 15 standards into all PRAMS data collection as part of the three-year extension.

As conveners of the Data Equity Coalition, we appreciate the opportunity to comment on this notice of proposed data collection.

Sincerely,

Data Equity Coalition