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March 22, 2021

Re: Title 17 SARS-CoV-2 Sequencing Data Submission

Dear CDPH Center for Infectious Disease,

On behalf of the California Conference of Local Health Officers (CCLHO), we support the proposed addition to Title 17 Sections 2505 of the California Code of Regulations, enhancing our understanding SARS-CoV-2 and requiring submission and notification of SARS-CoV-2 genetic sequencing data.

Proposed Addition:

A laboratory that performs genetic sequencing of SARS-CoV-2 shall submit sequence data to the Department in an electronic format specified by the Department. In addition, a laboratory that identifies a SARS-CoV-2 strain designated as a variant of public health importance by the Department shall transmit the report in a format specified by the Department to the state electronic reporting system or local electronic reporting system that is linked to the state electronic reporting system. The sequence data submission and the strain report shall include the information identified in subsection (c), and the federal Clinical Laboratory Improvement Amendments certificate number if applicable.

CCLHO was established in statute in 1947 to advise the California Department of Health Services (now California Department of Public Health), other departments, boards, commissions, and officials of federal, state and local agencies, the Legislature and other organizations on all matters affecting health. CCLHO membership consists of all legally appointed physician health officers in California's 61 city and county jurisdictions.

We thank you for your continued partnership and collaboration with you about matters of importance to the state and local health officers. Should you have any questions, please contact me by email at karen.relucio@countyofnapa.org or by phone at (707) 253-4566.

Sincerely,

Karen Relucio, MD

President, California Conference of Local Health Officers