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October 27, 2025

Re: Proposed information collection project titled Data Management Plan (DMP) Template,
Docket No. CDC-2025-0288

SPARC appreciates the opportunity to submit comments to the Centers for Disease Control and Prevention (CDC) regarding its proposed *Data Management Plan (DMP) Template*. SPARC is a non-profit advocacy organization that supports systems for research and education that enable everyone, everywhere to access, contribute to, and benefit from sharing knowledge. Our membership includes more than 200 academic and research libraries at higher education institutions in the U.S. spanning 45 states.

As stewards of taxpayer-funded research, the CDC has a responsibility to make the results of publicly funded research (both publications and data) freely available and fully reusable to the public, as well as ensure that publicly funded scientific data serves the public interest as a shared national resource. SPARC strongly supports the CDC's commitment to advancing data reuse, reproducibility, and accessibility, and believes the DMP guidance and template can play a pivotal role in ensuring broader public access to and discovery of CDC-funded data.

SPARC supports the use of a common DMP template across the agency. The proposed DMP template appropriately asks applicants to describe how data will be shared and to justify any data that will not be made freely available. To further strengthen these provisions and to align with the *2025 Gold Standard Science Guidance*¹ and the *2022 OSTP Public Access Memorandum*², we recommend that the CDC explicitly adopt the principle that the data underlying publications should be made open by default with appropriate safeguards to protect privacy. In addition, the CDC should require that applicants include plans for sharing data not directly associated with a scientific publication. This ensures that applicants consider data management and sharing early in the research lifecycle - reinforcing research integrity and enhancing reproducibility.

SPARC applauds the CDC's emphasis on the long-term preservation of data and its requirement for applicants to specify where data will be hosted. To further support sustained access and effective stewardship, we recommend that the CDC require applicants to use repositories that align with the *National Science and Technology Council's Guidance on Desirable Characteristics of Data Repositories for Federally Funded Research*³ and that adhere to appropriate privacy frameworks when handling data that may contain or be derived from personal information. Such repositories are best positioned to ensure that federally funded data remain findable, accessible, interoperable, and reusable (FAIR).

We commend the CDC's collection of standards and documentation in DMPs to promote data interoperability and reuse. SPARC encourages CDC to further strengthen this practice by using digital persistent identifiers (PIDs). The CDC should recommend the use of data repositories that assign PIDs to the data, as well as utilize PIDs for data creators/authors, creator affiliations, funding organizations, and sources of funding to better support scientific integrity and transparency^{4,5}. These PIDs might include digital object identifiers (DOIs) for research outputs and funding awards, archival resource keys (ARKs) for research outputs, ORCID iDs for authors, and research organization registry (ROR) IDs for organizations.

The CDC's goals of promoting data reuse, improving accessibility, and enhancing interoperability are both important and achievable. Success will depend on ensuring that applicants plan for data management from the outset and leverage research infrastructure designed to advance openness and reuse. SPARC and our academic library community support the CDC's goals and appreciate the opportunity to provide input on this important initiative. We look forward to opportunities to engage with the CDC to support achieving them.

Sincerely,

A handwritten signature in black ink, appearing to read "Carly Robinson". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Carly Robinson
Senior Policy Fellow
SPARC

¹ Office of Science and Technology Policy Memo (2025), [Agency Guidance for Implementing Gold Standard Science in the Conduct & Management of Scientific Activities](#).

² Office of Science and Technology Policy Memo (2022), [Ensuring Free, Immediate, and Equitable Access to Federally Funded Research](#).

³ National Science and Technology Council, Subcommittee on Open Science (2022), [Desirable Characteristics of Data Repositories for Federally Funded Research](#).

⁴ U.S. Department of Transportation, National Transportation Library, [Library Guide on Persistent Identifiers](#).

⁵ U.S. Department of Energy, Office of Scientific and Technical Information, [Guidance on Using Persistent Identifiers](#).