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February 24, 2026

Re: Public Comment on Notice of Funding Opportunity (NOFO) Data Management Plan (DMP)  
Template for Extramural Research

Dear Drs. Wong and Eliseo,

SPARC appreciates the opportunity to provide comments regarding the proposed Data Management Plan (DMP) template designed for CDC's extramural research applicants. 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.

SPARC strongly supports the CDC's commitment to advancing data reuse, reproducibility, and accessibility, and we believe that the DMP guidance and template can play a pivotal role in ensuring broader public access to and discovery of CDC-funded data.

In October 2025, [SPARC provided comments](#) to CDC's Federal Register Notice ([Docket No. CDC-2025-0288](#)). SPARC was appreciative of the CDC's responsiveness – confirming receipt of our comment and following up by email on those recommendations. This revised DMP template addresses the majority of our recommendations, including requiring data underlying scientific publications to be made available coincident with the paper and incorporating the use of persistent identifiers.

SPARC applauds the CDC's requirements for applicants to include the standards to be used for collecting or generating data and the mechanisms for providing access to and sharing of the data within the DMP. To align with established federal guidance, improve data management and sharing, and emphasize long-term preservation of data, we also recommend the CDC explicitly direct 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*<sup>1</sup> and that adhere to appropriate privacy frameworks when handling data that may contain or be derived from personal information.

SPARC commends the CDC's objectives of promoting data reuse, improving accessibility, and enhancing interoperability. 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 the first name "Carly" being more prominent than the last name "Robinson".

Carly Robinson  
Senior Policy Fellow  
SPARC

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<sup>1</sup> National Science and Technology Council, Subcommittee on Open Science (2022), [Desirable Characteristics of Data Repositories for Federally Funded Research](#).