

To: Centers for Disease Control and Prevention (CDC) and Office of Information and Regulatory Affairs (OIRA)

Re: Public Comment on Notice of Funding Opportunity (NOFO) Data Management Plan (DMP) Template (ICR Reference Number: 202601-0920-012)

2/20/2026

Dear Drs. Wong and Eliseo,

Thank you for the opportunity to submit this comment regarding the proposed Data Management Plan (DMP) template designed for CDC's extramural research recipients. I'm noting that I fully support CDC's responsiveness to [previous comments](#) submitted by The Data Foundation and SPARC.

While the revised template provides a structured approach to capturing data management intentions, the following recommendations are offered to improve the quality of collected information, reduce burden on investigators, and ensure alignment with federal data policy. I also recommend that the template undergo additional polish to improve the user experience in filing out the collection. Finally, it is not immediately clear which system and SORN the collected data will be stored under and I request that that information be included on the form itself.

Also, I drafted these comments prior to the very recent announcement that the NIH plans to change their [DMP template](#). My recommendation below to align with the mature NIH DMP template and plan relates to the current version and not the proposed changes noted in this new announcement. The new NIH proposal diverges from the fitness-for-purpose of the DMP template: which is to set researchers up for success in making their data findable, accessible, interoperable, and reusable once it is eventually shared in a responsible manner per agency policy. Now that Dr. Bhattacharya is both NIH Director and acting Director of the CDC, I hope that greater coordination and alignment on these instruments and policies between the two agencies is possible.

Thank you, again for the opportunity to submit this comment.

Sincerely,

Christopher Steven Marcum, Ph.D.
Open Science Advocate

Alignment with Federal Data Frameworks

The current template sections on standards and archiving should explicitly direct users to ensure their plans are consistent with established federal guidance. Please make direct reference to the following federal guidance documents in the template to assist investigators

who may need help:

- **NSTC Desirable Characteristics:** The form should require that selected data repositories meet the standards outlined in the [NSTC Desirable Characteristics of Data Repositories for Federally Funded Research](#) report to ensure long-term preservation and discoverability.
- **NIST Research Data Framework (RDaF):** The CDC should direct applicants to use the [NIST Research Data Framework](#) as a guide for managing the full lifecycle of research data.
- **Open Government Data Act (OGDA):** I applaud the CDC for including an option for researchers to deposit their data in HHS repositories. CDC is obligated by Title II of the Evidence Act (the OGDA), and its [OMB implementation guidance](#), to maintain all data assets it acquires in an open, machine-readable, format, and with an open-license (or in the public domain). CDC should add instructions to the DMP template providing guidance that conformity to the requirements of the OGDA is an expectation for all CDC-funded research data.

Persistent Identifiers and Public Access

To ensure transparency and compliance with federal requirements, track the ROI of CDC R&D investments, and facilitate AI-use of research outputs, the template should strengthen its use of persistent identifiers (PIDs).

- **ORCID Requirements:** Section P.03 currently lists ORCIDs for team members. I commend CDC for including those in the collection. However, to be consistent with [NSPM-33 implementation guidance](#), the form should be updated to strictly require ORCID iDs for all Principal Investigators to ensure unambiguous researcher attribution.
- **DOI Mandates:** Consistent with the [2022 OSTP Public Access Memo](#), the template should require that all data, code, and manuscripts generated under the award are shared using [Digital Object Identifiers \(DOIs\)](#).

Interagency Consistency and Burden Reduction

The CDC should align this DMP template and its underlying policy with the more mature [NIH Data Management and Sharing Policy](#).

- **Efficiency:** Adopting a framework consistent with the NIH DMSP will improve administrative efficiency for the many research institutions that receive funding from both agencies.
- **Burden Reduction:** Greater interagency consistency reduces the compliance burden on the research community by providing a unified set of expectations for data management and sharing.

Technical Documentation and Archiving

The current template provides options for data documentation such as README files and codebooks to be included by the investigator. I also recommend that the CDC further emphasize that these materials, along with the underlying code produced by a CDC grant, must be deposited in open repositories alongside the data. This ensures that the public and scientific community can fully understand and replicate the findings of CDC funded research as intended by federal information policies.