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**Comments Received :**

Re: Opposition to ICR Reference No: 202602-0925-003 / NIMH Data Archive (NDA) Data Access Closeout Report

To the Office of Information and Regulatory Affairs (OIRA) and the Department of Health and Human Services:

I am submitting this comment to formally object to the methodology proposed in the Information Collection Request titled "The National Institute of Mental Health Data Archive (NDA) Data Access Closeout Report" (ICR Reference No: 202602-0925-003).

While the NIMH's goal of monitoring data access and expiration is administratively understandable, the requirement that researchers must explicitly "confirm destruction of all copies of accessed data" introduces a severe architectural vulnerability to the federal scientific record.

Scientific integrity and reproducibility rely heavily on the decentralized preservation of data. By mandating the destruction of all independent, local research copies, this ICR forces the NIMH Data Archive to become a single point of failure. Centralized repositories—regardless of the current administration—are historically vulnerable to sudden policy shifts, funding gaps, server migrations, and administrative re-prioritizations. If the central NDA repository is ever compromised, altered, or taken offline, the scientific community will have been stripped of the distributed backups required to verify historical research.

Furthermore, the federal government should not be relying on 471 hours of human burden and honor-system paperwork to enforce data governance. Modern data architecture has already solved this.

Instead of forcing scientists to destroy data, the NIMH should adopt mathematically constrained data architectures that use W3C standards such as the Data Privacy Vocabulary (DPV) and the Open Digital Rights Language (ODRL). When access controls and expirations are cryptographically bound to the data at the point of inception (Data Physics), the data natively enforces its own usage limits.

I urge OIRA to reject this ICR. We must not use the Paperwork Reduction Act to mandate the destruction of the decentralized scientific record when native, cryptographic data architectures render such administrative burdens obsolete.