

Appendix 7: Data dissemination and data sharing requirements for recipients

1.0 Background

This document is designed to provide health departments applying to the *Overdose Data to Action: Limiting Overdose through Collaborative Actions in Localities* (OD2A: LOCAL) NOFO details on key data dissemination and data sharing requirements.

Public dissemination and sharing of data submitted by recipients to CDC is governed by general requirements that apply to all OD2A: LOCAL recipients (See Section 2.0). Federal mandates to both disseminate and secure data collected from entities is briefly described. Requirements set forth in the Office of Management and Budget (OMB) memo, “Open Data Policy—Managing Information as an Asset” (OMB M-13-13)¹; Executive Order 13642 titled “Making Open and Machine Readable the New Default for Government Information”²; and the Office of Science and Technology Policy (OSTP) memorandum titled “Increasing Access to the Results of Federally Funded Scientific Research” (OSTP Memo)³ mandate that CDC is responsible for disseminating data it has collected from funded entities, subject to limits imposed by law, resources, confidentiality, technology, and data quality.

CDC recognizes the critical importance of maintaining standards of data quality, upholding individual and institutional privacy and confidentiality, and ensuring impartiality in the sharing of public health data. CDC stores all data received by recipients in an access-controlled share folder, which resides on the CDC Network. The CDC Network is password protected and follows all National Institute of Standards and Technology (NIST) requirements for data security.

2.0 General data dissemination and data sharing requirements for all OD2A: LOCAL recipients

CDC will use data received by recipients to do such things as assess data quality, identify data entry errors, evaluate application of case definitions, inform program evaluation, and disseminate data and results to a broad audience. Jurisdictions will be required to ensure high quality, complete, and timely data are shared with CDC. CDC will also review and conduct quality control checks on all data submitted by the jurisdiction prior to conducting analysis; if discrepancies are identified, CDC staff will reach out to the jurisdiction to identify the problem and facilitate correction or resubmission of the data. Once data are submitted by the jurisdiction and verified by CDC, they are considered validated, and CDC is permitted to widely and publicly disseminate results. Below are several examples:

- Print, including publications in peer-reviewed literature, MMWRS, published reports, data briefs, periodicals, brochures, books, and media correspondence,
- Electronic, such as the CDC website (e.g., dashboards), listserv, and e-mail,
- Audiovisual, broadcast scripts, audio or videotapes, and video casting,

¹ <https://project-open-data.cio.gov/policy-memo/>

² <https://obamawhitehouse.archives.gov/the-press-office/2013/05/09/executive-order-making-open-and-machine-readable-new-default-government->

³ https://obamawhitehouse.archives.gov/sites/default/files/microsites/ostp/ostp_public_access_memo_2013.pdf

- Oral, formal speeches, oral presentations, and interviews, or commentaries for publication or broadcast,
- Data briefs or tables shared with CDC, HHS, and other governmental leaders in response to internal or external requests,

Across all CDC dissemination products, data suppression rules will be used to prevent possible identification through publication of tables combining characteristics that could be used to identify an individual (e.g., age, sex, race/ethnicity, and geographic location). CDC may suppress data for case counts ranging from 1 to 9 cases at the jurisdiction level and for rates calculated with fewer than 20 cases because of possible instability of estimates. CDC aims to provide recipients with advance notification before CDC publicly releases any print publications (e.g., peer-reviewed publications, MMWRs) or web data (e.g., website updates using the data) that use data submitted by recipients.