

SB 870 Elev8 Baltimore_Alexandria Warrick Adams_Fa

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Position: FAV

February 21, 2022

Maryland General Assembly
Education, Health and Environmental Affairs Committee
2 West
Miller Senate Office Building
Annapolis, MD 21401

Attention Senator Paul G. Pinsky, Chair
Senator Cheryl C. Kagan, Vice Chair

Elev8 Baltimore submits this letter of support for ***Senate Bill 870: Baltimore City Youth Data Hub - Establishment***. Elev8 Baltimore partners with schools, families and the community to ensure that every student is prepared for high school, college career and life by providing out-of-school time opportunities, school-based health services, and resources, support and outreach for the families we serve.

Senate Bill 870 establishes the Baltimore City Youth Data Hub, an integrated, electronic data management system that links data about youth from any provider to promote the well-being of youth and improve access to and cost-efficiency of youth programs.

Though Baltimore's youth receive services from multiple public agencies and nonprofits, the lack of information-sharing between providers prevents Baltimore from strategically, effectively, and equitably designing programs that meet the needs of young people. The Baltimore Youth Data Hub will bring allied stakeholders, including communities, providers, policymakers and researchers, into a partnership that will inform policy decisions and program design and better address the diverse needs of the community.

As such, Elev8 Baltimore urges the Senate Education, Health, and Environmental Affairs Committee to give Senate Bill 870 a favorable report.

In Service,

Alexandria Adams

Alexandria Warrick Adams
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SB0870 - BP Testimony.pdf

Uploaded by: Bridget Blount

Position: FAV



SB870: Baltimore City Youth Data Hub – Establishment

Senate Committee on Education, Health, and Environmental Affairs

February 22, 2022

Position: Support

On behalf of the Board of Baltimore's Promise¹ and its hundreds of community partners across the city's public, private, and nonprofit sectors, we write to express our strong support for SB870, which establishes the Baltimore City Youth Data Hub for the purposes of promoting the well-being of youth and improving access to and cost-efficiency of youth programs.

Baltimore's youth receive services from multiple public agencies and nonprofits. All of these organizations collect data, but there is not a centralized, permanent, and secure infrastructure within the city to facilitate data sharing among agencies that support many of the same youth. This lack of information-sharing prevents Baltimore from strategically, effectively, and equitably meeting its young people's needs. This disjointed approach to service delivery coupled with a lack of transparency, only exacerbates current and historical inequities. We are confident that the data generated by the Baltimore City Youth Data Hub will enable public agencies, youth-program providers, philanthropic collaboratives, and policymakers to understand the complex, interconnected issues facing children and families in Baltimore, identify where systems efforts are duplicated or missing, maximize resource efficiency, and to advance programs and policies that better meet the specific needs of the community.

Many states and cities across the U.S. have established cross-agency integrated data systems, and the Baltimore Youth Data Hub will build on best practices to generate evidenced-based information to improve education, health, housing, employment and other quality of life outcomes for all of our young people.

Working with Actionable Intelligence for Social Policy (AISP), a national technical assistance provider, Baltimore's Promise, Baltimore City Schools, and the Mayor's Office participated in a nation-wide cohort training program to build specific plans related to the legal, governance, and operational framework of an integrated data system. The Baltimore Youth Data Hub is being designed to minimize risks to privacy and security as well as the risk of inaction when our youth need us to act. The Hub is being constructed with principles of privacy by design. This means that privacy protections and data ethics are not an afterthought or an add-on but are central to how the entire Data Hub is being designed and implemented. Access to and use of the Baltimore Youth Data Hub will be controlled by a transparent, inclusive governance oversight process.

The Baltimore City Youth Data Hub brings communities, providers, policymakers and researchers into partnership, to make informed decisions as they create and implement programs and policies designed to eliminate disparities and achieve equitable outcomes for the success of Baltimore's youth and families. We urge the Senate Education, Health and Environmental Affairs Committee to give SB870 a favorable report.

¹ Baltimore's Promise is a city-wide collaborative that coordinates strategy, identifies quality programs, supports alignment activities, establishes shared measures for meaningful results, builds public will, and advances policy on behalf of Baltimore City's children and youth.



How will the Baltimore Youth Data Hub Protect Individual's Privacy?

People won't use data they don't trust. The Baltimore Youth Data Hub is employing industry-leading privacy and security protections to ensure the Hub is a tool we can all trust.

[The Baltimore Youth Data Hub](#) will help city agencies and partners [better understand and serve](#) Baltimore's youth and will protect people's privacy in two ways:

1. Data security measures that prevent unauthorized access to data.
2. Data privacy policies and governance that control authorized access.

In short, the Hub's is designed to keep the wrong people out and to transparently govern how the approved people access and use data.

Data Security: [The Hub's technological safeguards keep systems secure.](#)

- All data used in the Baltimore Youth Data Hub will be [deidentified](#), meaning that the data won't include names or any personal information that could identify an individual person.
- The Data Hub's technological systems will be managed by a trusted **service provider** with the expertise and experience to implement data security measures, protect against ransomware attacks, and keep up with developments in the system management and security fields.
- The Hub will employ [multifactor authentication](#), which requires users to verify their identity with multiple methods, typically [a combination](#) of a known element (like a password), possession of a controlled item (like an authorized computer), and a personal marker (like a fingerprint).
- Data in the Hub will be **encrypted in movement and at rest**, meaning that any data brought together through the Hub will be purposefully altered and disguised so that it could not be understood or interpreted even if someone were to access it.
- The Hub is being built as a **federated model**, meaning that no data permanently lives within the Hub. All data is stored and managed by the same city agencies who have the data now; data is only connected through the Hub when an authorized user is conducting approved research.

Data Privacy: [The Hub's policies govern access and ensure data use is ethical and fair.](#)

- The Hub is being constructed with [principles of privacy by design](#). This means that privacy protections and data ethics aren't an afterthought or an add-on, but are central to how the entire Data Hub is being designed and implemented.
- Access to and use of the Baltimore Youth Data Hub will be controlled by a **transparent, inclusive governance committee**. This governance body will include representatives from all of the city agencies that are contributing data to the Hub. Only projects approved by this committee can be done.
- Access to the Data Hub will be [role-based](#), meaning that only people whose need access to specific data to do their jobs will have access. Access is based on people's roles, not on favors or informal arrangements.

Many [other cities and states](#) have successfully implemented this type of data hub and The Baltimore Youth Data Hub will build on the field's best practices. The Baltimore Youth Data Hub is being designed to minimize risks to privacy and security as well as the risk of inaction when our youth need us to act.



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BALTIMORE'S
PROMISE

Every Child. Infinite Possibilities.

SB 0870_AISP_fav.pdf

Uploaded by: Emily Berkowitz

Position: FAV



Esteemed members of the Maryland General Assembly,

Our team at Actionable Intelligence for Social Policy (AISP) at the University of Pennsylvania is writing in support of Senate Bill 0870 establishing the Baltimore City Youth Data Hub. For the past thirteen years, we have assisted government agencies and their university and non-profit partnerships as they work to build the relationships and infrastructure to securely share and integrate data to improve lives.

We have worked with over 40 cities, counties, and states across the country and regularly convene a national network where we promote best practices and standards for data sharing. In this capacity we provided training to the City of Baltimore and Baltimore's Promise in the early stages of the Youth Data Hub's development in 2018-19. We have since witnessed their progress towards a vision where integrated data drives policy and program improvements to better meet the complex needs of the Baltimore's youth.

We have also seen similar efforts pay dividends in other cities and states. When data are shared and linked, governments are better able to measure outcomes to understand what works and efficiently allocate resources where they're needed most.

Our network has demonstrated that this can be done safely with strong governance, legal frameworks, and security protocols in place to protect privacy. To date, we are not aware of a single largescale security breach or incident in the network, and many governments report that the cross-agency governance they've established to share data has in fact improved privacy practices within participating agencies as well. Therefore, we recommend that governments invest to in these systems to minimize risks and maximize the impact of their shared data assets.

In conclusion, we strongly urge you to support Senate Bill 0870 and the establishment of the Baltimore City Youth Data Hub in keeping with national best practices. Thank you for all you do to support evidence-based practices that promote the well-being of children and youth of Baltimore and across the state.

Sincerely,

Della Jenkins
Executive Director, Actionable Intelligence for Social Policy (AISP)

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SB0870-EHE-FAV.pdf

Uploaded by: Faith Leach

Position: FAV



BRANDON M. SCOTT
MAYOR

*Office of Government Relations
88 State Circle
Annapolis, Maryland 21401*

SB 870

February 22, 2022

TO: Members of the Senate Education, Health, and Environmental Affairs Committee

FROM: Faith Leach, Director, Deputy Mayor of Equity, Health and Human Services

RE: SB 870 - Baltimore Youth Data Hub

POSITION: SUPPORT

Chair Pinsky, Vice Chair Kagan, and Members of the Committee, please be advised that the Baltimore City Administration (BCA) **supports** Senate Bill (SB) 870 which establishes a Youth Data Hub to help improve the quality of life for the City's youth and families.

The City of Baltimore recognizes our young people as our greatest asset. As such, it is the intention of the Mayor Scott Administration to leverage our platform, and this pivotal moment in our City's history to marshal the resources of government to support our young people. It is our goal to transform the systems that for far too long have failed to respond quickly to their needs – especially our young people and families in crisis.

In Baltimore the statistics are alarming:

- In our city there are more than 18,000 young people disconnected from school and/or work.
- Over the past five years, 208 children died in Baltimore City.
- Child fatality victims in Baltimore are predominantly (1) vulnerable infants and children, and (2) teens aged 16-17 struggling in school and involved in the juvenile justice system

Young people and their families, especially our most vulnerable young people like the ones described above often are receiving government services and touching multiple systems. Imagine if these systems were able to share data, and tailor interventions and services to potentially save lives – that is our goal with the Baltimore Youth Data Hub.

The Baltimore Youth Data Hub is an integrated data system, linking data across youth-serving organizations into an anonymous system subject to community oversight and strict guidelines, to improve quality of life outcomes for all of our City's young people.

It brings together communities, providers, policymakers, and researchers into partnership, to make informed decisions as they create and implement programs and policies designed to eliminate disparities and achieve equitable outcomes for the success of Baltimore's youth and families.

Through the data hub, we are adding world-class IT capacity to our data systems. By partnering with technologists who have experience in both securing and anonymizing data we will create both the technical infrastructure required to protect this information, but also the analytical capacity to turn that data into action. Being able to use data and analysis to understand how our work has impacted youth over generations is foundational to deepening our impact and healing our communities.

Data are a public trust, and being good stewards of our data resources entails not just protecting it but seeking the most effective and ethical means for leveraging it. We can and must do both, and the Youth Data Hub can demonstrate best practices in both data management and use. We need *every tool* available to us to improve health and education outcomes; to heal our children from trauma; and to mitigate the continued impact of generations of inequity and injustice, and that means making better use of our collective data resources.

Mayor Scott has prioritized data governance, privacy, and transparency, and the City intends to bring these practices to bear in the implementation of the Youth Data Hub. The Baltimore Youth Data Hub concept has at its core best practices in data security, privacy, and warehousing – tools like anonymization, multifactor authentication, encryption, and transparent governance. Upon this foundation, the City and its partners can combine data to build deeper insights about our children's intersecting services and needs, identify service gaps, and stage more effective interventions.

Baltimore cannot afford to leave opportunities for better and more equitable health and education outcomes for our children on the table, nor can we afford to expose our precious data resources to attack or theft. The Youth Data Hub will enable the City and its partners to change the direction of our children's lives and protect our most valuable data resources.

We respectfully request a **favorable** report on SB 870.

SB 0870_Mark Lerner_fav.pdf

Uploaded by: Mark Lerner

Position: FAV



**Testimony Concerning SB0870 “Baltimore City Youth Data Hub – Establishment”
Submitted to the Senate of Delegates Committee on Education, Health, and
Environmental Affairs
February 22, 2022**

To: The Senate of Delegates Committee on Education, Health, and Environmental Affairs.
From: Mark Lerner, Baltimore’s Promise, Board Chair

Re: SB 0870 “Baltimore City Youth Data Hub—Establishment”

I am honored, in my capacity as Board Chair of Baltimore’s Promise, to join in others testifying today with regard to the unique opportunity that we have before us for Baltimore’s children, and therefore request your support for the Education, Health, and Environmental Affairs Committee to pass this proposed legislation to establish the Baltimore Youth Data Hub.

The mission of Baltimore’s Promise is to coordinate strategy, identify quality programs, support alignment activities, establish shared measures for meaningful results, build public will, and advance policy on behalf of Baltimore City’s youth. Today, hundreds of stakeholders – including the school district, higher education institutions, foundations, businesses, nonprofits, community leaders, adult residents, and youth and young adults – are engaged to build a broad basis of support for our commitment to work together to benefit our children.

Baltimore’s Promise has five ambitious goals for the City’s youth as they progress from childhood to adulthood:

- Babies are born healthy.
- Children enter kindergarten ready to succeed in school.
- Children and youth achieve at grade level in school.
- Youth graduate high school prepared for the next step without remediation.
- Youth earn quality post-secondary credential or receive training and are career ready.

From the outset, we have operated collaboratively, always committed to undertaking our efforts within Baltimore’s Promise’s clear commitment to race, equity, and inclusion. Throughout Baltimore’s history, we have never had a complete and reliable compilation of data that provided us with the means of assessing both the resources our young people need and how we can most effectively raise and allocate them so that our young people can grow up with an expectation that they will graduate from high school prepared for continuing education and/or meaningful employment.



During the past decade, bringing together leaders from government including mayors, school CEOs, Health Commissioners, heads of universities, leaders from major businesses and philanthropies, we have launched a number of undertakings that are transforming education, public safety, justice, housing, workforce training, and more for the sake of improving the lives of Baltimore's youth. However, every project we undertake leads us back to an absolute need for reliable data about the City's young people in order to make sure that we are meeting their needs and most efficiently allocating resources to these efforts. The Baltimore Youth Data Hub is an integrated data system, linking across youth-serving organizations into an anonymous system subject to community oversight and strict guidelines, to improve quality of life outcomes for all of our young people. Moreover, more than a half decade has gone into designing this data hub, learning from the experiences of more than 60 cities around the US that have implemented youth data hubs, and assuring that the privacy rights of every young person in Baltimore are assured as the data hub is implemented and maintained.

The opportunities that will be generated by this data hub are truly transformational and I implore the Committee members to vote in support of SB 0870. Please let me know if you have any questions or need further clarification. I can be reached by phone at (410) 602-0195 or by e-mail at Mark@tramar.org. Thank you very much.

Baltimore Youth Data Hub 1 Pager.pdf

Uploaded by: Mary Washington

Position: FAV



The Baltimore Youth Data Hub is an integrated data system, linking data across youth-serving organizations into an anonymous system subject to community oversight and strict guidelines, to improve quality of life outcomes for all of our young people.

Baltimore’s youth receive services from multiple public agencies and nonprofits. All of these organizations collect data, but they don’t—or legally can’t—share that data with other agencies that support many of the same youth. This lack of information-sharing prevents Baltimore from strategically, effectively, and equitably meeting its young people’s needs. This disjointed approach to service delivery coupled with a lack of transparency, only exacerbates the current and historical inequities we seek to eliminate.

Building on many of the emerging best practices of other cities, we are developing the Baltimore Youth Data (“the Hub”), an integrated data system that will create a central archive for data that is linked at the individual level, with all potential identifying information removed to protect the privacy of individuals. It offers a secure and sustained system that enables practitioners, policy makers, and researchers the ability to share and use data between multiple agencies and organizations. By linking data across agencies, we will be able to understand the complex, interconnected issues facing children and families in the city and design programs that better meet the needs of the community.

WHAT KIND OF DATA MAY BE INCLUDED?



EDUCATION



HEALTH



HOUSING



CHILD WELFARE



EMPLOYMENT



JUSTICE SYSTEMS



PARTNERS

Hub partners and community stakeholders collaborate on “use cases” — demonstration projects that link data from multiple agencies — to address issues that are important to the community. For example, a Hub use case on “opportunity youth” may link data from foster care, juvenile services, public housing, homeless services, out-of-school time, social services, early childhood programs, education, and employment to understand the causes of long-term disconnection from higher education and workforce opportunities and design programs to intervene early with supportive services.

BALTIMORE YOUTH DATA HUB PRINCIPLES

1. Quality data analysis can only be achieved with an understanding of historical context and competence.
2. Transparency and community trust building are key priorities of data governance, sharing and use.
3. Focus on improving system level program efficiencies and service coordination, not on individual participants.
4. Data will be used to highlight and eliminate racial disparities and inequities.
5. Data use will be ethical, transparent, and enforce high standards of privacy.

HOW CAN THE BALTIMORE YOUTH DATA HUB HELP BALTIMORE?

The “Baltimore Youth Data Hub” brings communities, providers, policymakers and researchers into partnership, to make informed decisions as they create and implement programs and policies designed to eliminate disparities and achieve equitable outcomes for the success of Baltimore’s youth and families.

With the Hub, stakeholders can better understand interrelated needs of communities and compare services and outcomes across groups by gender, race/ethnicity, place, and program-specific subpopulations (e.g. foster youth or youth experiencing homelessness) to address inequities in resources and opportunities.

The Hub will offer a more secure and efficient way for agencies to share data that will help inform policy decisions and program design and better address the diverse needs of the community.



DEMONSTRATION PROJECT

In 2019, we began convening and engaging summer program providers around a collaborative Baltimore Summer Engagement Ecosystem (SEE) project to demonstrate the potential of the Hub to inform our understanding of gaps in summer opportunities and provide intelligence for planning more equitable programs to serve youth in Baltimore throughout the summer.

By integrating data from the Baltimore Summer Funding Collaborative, Baltimore City Recreation and Parks, the Mayor’s Office of Employment Development YouthWorks program, Baltimore City Public Schools, and the Family League of Baltimore, we will have unduplicated counts of participation by Baltimore City children in summer programs. We will also be able to see whether there are gaps in participation across geographic space or time over the summer or gaps in service uptake by age, gender, race, or ethnicity. By understanding patterns of participation, the city can collectively plan to eliminate gaps.

GOVERNANCE, TRANSPARENCY, SECURITY

Administrative data in Baltimore is generated by and belongs to the people of Baltimore. All stakeholders, including the public, benefit from comprehensive data accessed in a way that protects individual privacy and security. The Hub will be governed by a board made up of the executive leadership of the agencies that contribute data and informed by community stakeholders. Only authorized individuals will be allowed to access the Hub and only upon approval of the Governing Board in accordance with its governance policies and procedures.

Sen Washington Written Testimony SB870.pdf

Uploaded by: Mary Washington

Position: FAV

MARY L. WASHINGTON, PH.D
Legislative District 43
Baltimore City

Education, Health, and
Environmental Affairs Committee

Chair
Joint Committee on Ending
Homelessness

Chair
Joint Committee on Children,
Youth, and Families



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THE SENATE OF MARYLAND
ANNAPOLIS, MARYLAND 21401

SB 870 – Baltimore City Youth Data Hub - Establishment
Testimony of Senator Mary Washington
February 22, 2022

Dear Colleagues,

I respectfully urge you to vote favorable on SB 870, which has been requested on behalf of Mayor Brandon Scott of Baltimore City.

SB 870 would establish a Youth Data Hub (“The Hub”) for Baltimore City. The Hub is an integrated data system, linking anonymous data across youth-serving organizations into a system subject to community oversight and strict guidelines. The goal is to improve quality of life outcomes for all of our City’s youth. The Hub is a partnership between the City, City Schools, and nonprofits that are currently collecting data on City youth but cannot legally share the data they are collecting – even though they are all supporting the same youth.

SB 870 legally allows for that data exchange and establishes a safe, secure, anonymized way of sharing that data in one centralized location. All potential identifying information will be removed to protect the privacy of the individuals. The bill allows for a more comprehensive and unified approach to addressing the complexities and inequities in the delivery of services, resources, and opportunities for the City’s youth.

This hub has been years in the making and promises to use data to more effectively and equitably meet the needs of youth in the community. For these reasons, I ask for your favorable report on Senate Bill 870.

In Partnership,

A handwritten signature in blue ink, appearing to read "Mary Washington".

Senator Mary Washington
Maryland 43rd District

SB870 Testimony - City Schools - Baltimore City Yo

Uploaded by: Theresa Jones

Position: FAV

BALTIMORE CITY PUBLIC SCHOOLS

Brandon M. Scott
Mayor, City of Baltimore

Jhnette Richardson
Chair, Baltimore City Board
of School Commissioners

Dr. Sonja Brookins Santelises
Chief Executive Officer

Testimony in Support of Senate Bill 870 – Baltimore City Youth Data Hub

February 22, 2022

The Baltimore City Public School System (City Schools) supports SB870, which seeks to establish an integrated electronic data management system for the purpose of information-sharing across multiple public agencies and nonprofits serving young people. The goal of the proposed “Baltimore City Youth Data Hub” is to promote the health, safety, security and well-being of youth, and to improve equitable access to and overall cost-efficiency of programs serving youth.

City Schools has long been a partner in envisioning a method for Baltimore City whereby organizations can engage in data sharing in ways that lead to improved service delivery to young people. Specifically, Baltimore’s youth currently receive services from multiple public agencies and nonprofits. These organizations all collect data, but they do not – or legally can’t – share that data with other agencies that support many of the same youth. This lack of information-sharing prevents Baltimore from strategically, effectively, and equitably meeting its young people’s needs. This disjointed approach to service delivery coupled with a lack of transparency, only exacerbates the current and historical inequities City Schools seeks to eliminate.

Building on many of the emerging best practices of other cities, SB870 seeks to develop a collaborative “Hub” to link data across youth-serving organizations into an anonymous system subject to community oversight and strict guidelines, to improve education, health, housing, employment, and other quality of life outcomes for the City’s young people. The “Baltimore Youth Data Hub” will bring communities, providers, policymakers, and researchers into partnership, to make informed decisions as they create and implement programs and policies designed to eliminate disparities and achieve equitable outcomes for the success of Baltimore’s youth and families.

As the public school system partner in this endeavor, City Schools recognizes that efforts to tackle challenges in education – as well as health, public safety, and economic opportunity – are often limited by data silos which create a fragmented picture of services and risks shaping the lives of young people. City Schools looks forward to partnering with our sister agencies at the Baltimore City Health Department, the Mayor’s Office for Children and Family Success, and the Mayor’s Office of Employment Development among others, to establish this data-sharing platform. It is our shared goal that the Youth Data Hub will provide a secure system of inquiry enabling agencies and policymakers to make decisions on the complex needs facing our youth and families as they interact with multiple systems.

City Schools looks forward to fulfilling its role as a data provider to the Hub, and to ensuring the establishment of the necessary technology to build and deliver the data sets required for approved projects. In these challenging times, especially as we continue to face the long-term effects of the COVID-19 pandemic, it is more important than ever to establish a permanent and sustained cross-agency data sharing infrastructure to facilitate better coordination, inform decision-making, understand service utilization partners, support better program planning, and inform the effective use of target resources. For all these reasons, we respectfully urge a favorable committee report of SB870.

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Uploaded by: Hanna Abrams

Position: FWA

BRIAN E. FROSH
Attorney General

WILLIAM D. GRUHN
Chief

ELIZABETH F. HARRIS
Chief Deputy Attorney General



STATE OF MARYLAND
OFFICE OF THE ATTORNEY GENERAL

WRITER'S DIRECT DIAL NO.

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February 22, 2022

TO: The Honorable Paul G. Pinsky, Chair
Education, Health, and Environmental Affairs Committee

FROM: Hanna Abrams, Assistant Attorney General

RE: Senate Bill 870– Baltimore City Youth Data Hub - Establishment –
SUPPORT WITH AMENDMENTS

The Office of the Attorney General supports, with amendments, Senate Bill 870 (“SB 870”), which establishes the Baltimore City Youth Data Hub (Hub) to improve equitable access to programs serving youth in Baltimore City.

The bill includes procedures to safeguard the security and confidentiality of data included in the Hub, but we recommend modifying the definition of “personally identifiable information.” Section 31-101(j) defines personally identifiable information as “any data that, either alone or in combination, would tend to associate or link a piece of information with a particular individual in a manner that would allow a reasonable person in the community to identify the particular individual.” Because the definition is limited to data which would “allow a reasonable person” to identify an individual, it might be interpreted to not include personal identifiers such as biometric information. Given that this program will be collecting personal information, it is critical that the definition of personally identifiable information be as broad as possible to ensure that any personal information collected is adequately protected. Because the program involves youth, we recommend modifying the definition to conform with the definition codified in the Family Educational Rights and Privacy Act (FERPA)¹ by adding the following language to the definition of personally identifiable information:

“Personally identifiable information includes, but is not limited to:

- (a) The individual’s name;
- (b) The name of the individual’s parent or other family members;
- (c) The address of the individual or individual’s family;

¹20 U.S.C. 1232g; CFR §99.3.

(d) A personal identifier, such as the individual's social security number, student number, or biometric record;

(e) Other indirect identifiers, such as the individual's date of birth, place of birth, and mother's maiden name; or

(f) any data that, either alone or in combination, would tend to associate or link a piece of information with a particular individual in a manner that would allow a reasonable person in the community to identify the particular individual.”

With this amendment, the Office of the Attorney General urges a favorable report.

Cc: Members, Education, Health, and Environmental Affairs
The Honorable Mary Washington