



MLDS CENTER

Maryland Longitudinal Data System

Address 550 West Baltimore Street
Baltimore, MD 21201
Phone 410-706-2085
Email mlds.center@maryland.gov
Website mldscenter.maryland.gov

Testimony on Maryland Senate Bill 56 Maryland Longitudinal Data System Center - External Data Sharing - Multistate Reporting - Authorization

To: Chair Feldman, Vice Chair Kagan, and members of the Senate Committee on Education, Energy, and Environment
From: Ross Goldstein, Executive Director
Maryland Longitudinal Data System Center
Date: February 4, 2026
Position: Favorable

Overview

Senate Bill 56 would allow the MLDS Center Governing Board to authorize the Center to provide individual-level student and workforce data to a third party data center to enable multistate research and reporting on student outcomes. The legislation also specifies a set of criteria that the Governing Board must consider before granting authorization, and annually thereafter. The criteria include ensuring that:

1. The third party data center security meets or exceeds the data security implemented by the Center, including confirming that the third party data center remains a FedRAMP authorized and certified platform;
2. The use of personally identifiable information is limited to only those data elements that are necessary for data matching and that privacy enhancing techniques, such as data hashing, are used in place of personally identifiable data whenever appropriate;
3. Only de-identified data are used for analytic purposes;
4. Only aggregate data are released in reports and other output;
5. Aggregate data that may be identifiable based on the size or uniqueness of the population under consideration are not reported in any form; and
6. Written data sharing agreements are in place between the MLDS Center and the third party data center to comply with state and federal laws relating to data privacy.

Notably, items 3, 4, and 5 mirror the data use and disclosure limitations that apply to the Center under Education Article, § 24-703(h)(2) - (4), Annotated Code of Maryland. Finally, the legislation also requires the Governing Board to approve the data elements and data sets to be provided and to approve each proposed research or reporting project that seeks to use Maryland data provided to the third party data center.

SB 56 also repeals a provision that allows the Governing Board to send student information to the United States Census Bureau (see Ed. Art., § 24-703.2(e), Annotated Code of Maryland).

The purpose of that authorization was to allow the Center to share data with Census to be part of their *Post-Secondary Employment Outcomes Explorer (PSEO)*, a tool that provides earnings and employment outcomes for college and university graduates by degree level, degree major, post-secondary institution, and state of institution.

After the legislation passed, the Maryland Higher Education Commission determined that it would take the lead and provide the requisite higher education data needed for participation with PSEO. As such, there is no longer a need for this provision.

Justification

Nationally, state longitudinal data system leaders have recognized that there are limits to what a state can learn from only looking at its own data. This is especially true for states, like Maryland, that border several other states and have interconnected economies. To address these limitations, states have been developing multistate partnerships to allow them to conduct multistate research and analysis that capture movement across state lines.

Recently, the MLDS Center and its counterparts in Washington D.C. and Virginia submitted a joint grant application to the Coleridge Initiative's¹ *Democratizing Our Data Grant Challenge* to establish a multistate data sharing partnership for the purpose of better understanding K-12, higher education, and workforce pathways in the Capital Region. The grant was awarded, but for Maryland, participation in this initiative requires your approval of this departmental legislation which will authorize the MLDS Governing Board to allow the Center to disclose individual level student and workforce data (including personally identifiable information) necessary for this project.

In addition to important lessons that can be learned about K-12, higher education, and workforce pathways across Virginia, Maryland, and the District of Columbia, this bill will also make it possible, with approval and oversight by the MLDS Governing Board, for the MLDS Center to join other states in future multistate projects.

¹ The [Coleridge Initiative](#) is a nonprofit organization working with governments to ensure that data are more effectively used for public decision-making. Coleridge achieves this both by providing a platform to securely link confidential data within and across states and agencies, and by providing data literacy training to agency staff. Their platform is the [Administrative Data Research Facility](#) (ADRF), which is a secure, FedRAMP-authorized, cloud-based environment that enables government agencies to link their longitudinal data with other states and agencies. FedRAMP (Federal Risk and Authorization Management Program) is managed by the U.S. General Services Administration and provides a standardized approach to security assessment, authorization, and continuous monitoring for cloud products and services. The FedRAMP designation requires annual audits and reviews and assures a level of security that is equivalent to federal agencies.

In 2013, when the MLDS was being built, the first consideration was the security and privacy of student and worker data. In developing plans for a multistate project, the first consideration is still the security and privacy of student and worker data. This bill and our plans to conduct this multistate data sharing project with the Coleridge Initiative reflect that continued commitment. Coleridge and the ADRF have an advanced and highly secure system in place and strong data governance procedures to ensure Maryland data will be properly managed. SB 56 requires the same level of data security and governance as maintained by the MLDS Center.

For these reasons, I strongly encourage the committee to approve SB 56 which will provide Maryland with the opportunity to advance our understanding of student outcomes without compromising our high data security and privacy standards.