

## **SB0056 – Maryland Longitudinal Data System Center – External Data Sharing With Third-Party Data Centers**

Chair and members of the Committee:

I am a Maryland parent and special education advocate. I urge an **UNFAVORABLE** report on SB0056 because it authorizes the external sharing of individual-level student data **without creating meaningful protections, transparency, or rights for families—particularly families of students with disabilities.**

### **This bill expands data sharing without expanding parent rights**

SB0056 allows the Maryland Longitudinal Data System Center to share **individual-level student and workforce data** with third-party, multistate data centers for research and reporting purposes. While the bill references FERPA compliance and technical security standards, it provides **no requirement for parent notice, consent, opt-out, or meaningful transparency.**

FERPA is a minimum standard. It is not an enforcement mechanism, and families already know how limited its protections are in practice.

### **“De-identified” is not the same as “non-identifiable”**

The bill permits the use of personally identifiable information for data matching and relies on hashing and aggregation for downstream reporting. For students with disabilities—especially those in small or low-incidence populations, alternative placements, juvenile services, or child welfare systems—**re-identification risk is real**, even when data is labeled “aggregate.”

SB0056 does not acknowledge or mitigate that risk.

### **Students with disabilities are uniquely exposed**

Students with disabilities are disproportionately represented across the very systems whose data is being linked and shared under this bill: special education, discipline, juvenile services, and social services. SB0056 authorizes **cross-agency, cross-state data linkage** without a single disability-specific safeguard, limitation, or harm-prevention requirement.

That omission is not incidental—it is consequential.

### **Security controls are not the same as accountability**

SB0056 is detailed about:

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- platform certifications,
- data agreements,
- audits, and
- board approvals.

But it is silent on:

- family awareness,
- public transparency about what data is shared and why,
- remedies if data is misused or causes harm,
- accountability to the students whose data is being exported.

This is a systems-first data bill, not a student-centered protection bill.

### **Closing**

Maryland families are already carrying the burden of enforcement when educational rights are violated. SB0056 asks families to also surrender visibility and control over their children's data—without consent, without notice, and without meaningful recourse.

Until the General Assembly is willing to pair any expansion of data sharing with enforceable parent rights, disability-specific safeguards, transparency, and remedies, this bill should not advance.

I respectfully urge an **UNFAVORABLE** report.

Respectfully submitted,

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