

# **SB 56 MLSC External Data Sharing FAV.pdf**

Uploaded by: Beatrix Peck

Position: FAV



## Support

### Senate Education, Energy, and the Environment Committee

#### *Senate Bill 56 (Feldman)*

#### *Maryland Longitudinal Data System – External Data Sharing With Third-Party Data Centers for Multistate Reporting - Authorization*

**Matt Power, President**

[mpower@micua.org](mailto:mpower@micua.org)

**February 4, 2026**

On behalf of Maryland's independent colleges and universities and the more than 56,000 students we serve, thank you for the opportunity to provide a letter of support regarding [\*Senate Bill 56 \(Feldman\)\*](#) [\*Maryland Longitudinal Data System Center - External Data Sharing With Third-Party Data Centers for Multistate Reporting - Authorization.\*](#)

The Maryland Independent College and University Association (MICUA) has a long-standing commitment to data-driven decision making and has been an active partner in the development and implementation of the Maryland Longitudinal Data System (MLDS). As a member of the MLDS Center's Governing Board, MICUA has witnessed firsthand the exemplary work and research produced by the Center, which has established itself as the premier longitudinal data system in the country.

The MLDS Center's work provides critical insights and data analysis to inform education policy and improve student outcomes. Senate Bill 56 will enable the existing and professional Governing Board to share data in appropriate circumstances with reputable parties, allowing the MLDS to be nimbler and more responsive to emerging research needs and opportunities. By authorizing the Center to partner with third-party data centers, the bill will further enhance the MLDS's research, dashboards, and reporting capabilities, ultimately benefiting students, educators, and policymakers across the State.

MICUA strongly supports Senate Bill 56 and believes that it will help to advance the State's education goals and improve student outcomes. We urge the Committee to favorably consider this legislation and look forward to continuing our partnership with the MLDS Center to promote data-driven decision making and excellence in education.

**SB0056\_MACC\_FAV.pdf**

Uploaded by: Drew Jabin

Position: FAV

**Senate Education, Energy, and the Environment Committee**

February 4, 2026

**SB 56 - Higher Education - Scholarships for Correctional Officers**

**Position: Favorable**

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The Maryland Association of Community Colleges (MACC), representing Maryland's 16 community colleges, supports **SB 56**. This bill authorizes the Maryland Longitudinal Data System (MLDS) Center to share limited student and workforce data with secure third-party data centers for the purpose of multistate research and reporting on student outcomes, subject to strict privacy, security, and oversight requirements.

Maryland's community colleges educate a highly mobile student population, with many students living, working, or continuing their education across state lines. Current data systems are limited in their ability to capture these cross-border education and employment outcomes, which can result in an incomplete picture of how well programs prepare students for the workforce. By allowing participation in multistate data partnerships, SB 56 will help provide a more accurate and comprehensive understanding of how Maryland's community college students progress into further education and employment beyond the State's borders.

Importantly, SB 56 maintains strong safeguards for student privacy and data security. The bill requires that any third-party data center meet or exceed the MLDS Center's security standards, be certified under the Federal Risk and Authorization Management Program (FedRAMP), limit the use of personally identifiable information to what is necessary for data matching, and ensure that only de-identified and aggregate data are used for analysis and reporting. In addition, all data sharing must be governed by written agreements and subject to annual review and approval by the MLDS Center Governing Board.

For community colleges, access to high-quality multistate outcome data will strengthen program evaluation, workforce alignment, and accountability efforts by allowing institutions and policymakers to better assess the long-term educational and employment outcomes of students. SB 56 provides a responsible and carefully structured framework to support this work while preserving essential privacy protections. Accordingly, MACC urges the Committee to issue a **FAVORABLE** report on **SB 56**.

Please contact Brad Phillips ([bphillips@mdacc.org](mailto:bphillips@mdacc.org)) or Drew Jabin ([djabin@mdacc.org](mailto:djabin@mdacc.org)) with questions.

# **SB56\_ HB293 – Maryland Longitudinal Data System Ce**

Uploaded by: Jamie Shopland

Position: FAV

**Written Testimony - Favorable**

**Jamie Shopland, Appointed Member, Maryland Longitudinal Data System  
Governing Board**

**3915 Braveheart Circle, Urbana, MD 21704**

February 2, 2026

RE: Testimony in Support

SB 56 / HB 293 – Maryland Longitudinal Data System Center – External Data  
Sharing – Multistate Reporting – Authorization

Dear Chair Feldman and Members of the Education, Energy, and the Environment  
Committee,

I submit this testimony in strong support of SB 56 / HB 293 as an appointed member of  
the Maryland Longitudinal Data System (MLDS) Governing Board.

SB 56 authorizes the MLDS Center, with explicit Governing Board approval and  
oversight, to participate in secure, multistate research partnerships that allow Maryland  
to better understand education and workforce outcomes that cross state lines. This  
authority is both timely and necessary, and it better positions Maryland to leverage  
broader data sets to make informed, data-driven policy decisions.

**Why Multistate Data Sharing Matters**

Nationally, state longitudinal data system leaders have recognized that there are limits  
to what any state can learn by examining its data in isolation. This is especially true for  
Maryland, which borders multiple states and the District of Columbia and is part of a  
highly interconnected regional economy.

Maryland students frequently cross state lines for postsecondary education,  
employment, and training opportunities. Without the ability to responsibly link data  
across jurisdictions, policymakers are left with an incomplete picture of educational  
attainment, workforce participation, and economic mobility. SB 56 allows Maryland to  
move beyond these limitations and to use broader, more comprehensive data to  
evaluate what is working, where gaps remain, and how public investments can be better  
aligned with outcomes.

**3<sup>rd</sup> Partiers like the Coleridge Initiative and the Administrative Data Research  
Facility (ADRF)**

SB 56 would allow the MLDS Center to participate in a multistate partnership facilitated  
by the Coleridge Initiative, a nonprofit organization that works with governments to  
improve the use of data for public decision-making. Coleridge operates the  
Administrative Data Research Facility (ADRF), a secure, cloud-based data environment

## **Written Testimony - Favorable**

### **Jamie Shopland, Appointed Member, Maryland Longitudinal Data System Governing Board**

**3915 Braveheart Circle, Urbana, MD 21704**

that is authorized under the Federal Risk and Authorization Management Program (FedRAMP).

FedRAMP authorization requires rigorous security controls, continuous monitoring, and annual audits, providing a level of data security equivalent to that required of federal agencies. Participation through ADRF enables Maryland to benefit from larger, multistate datasets while maintaining strong safeguards around privacy and data security.

#### **Strong Governance, Oversight, and Privacy Protections**

Importantly, SB 56 does not grant blanket authority to share data. Instead, it places responsibility squarely with the MLDS Governing Board.

Before authorizing any data sharing, and annually thereafter, the Governing Board must determine that:

- The third-party data center meets or exceeds the MLDS Center's existing data security standards and remains FedRAMP authorized;
- Personally identifiable information is limited to only what is necessary for data matching, with privacy-enhancing techniques such as data hashing used whenever appropriate;
- Only de-identified data are used for analytic purposes;
- Only aggregate data are released in any reports or outputs;
- Aggregate data that could be identifiable due to small or unique populations are not reported; and
- Written data-sharing agreements are in place to ensure compliance with all applicable state and federal privacy laws.

These requirements closely mirror the existing data use and disclosure protections already governing the MLDS Center under Education Article § 24-703(h)(2)–(4). In addition, the bill requires Governing Board approval of the specific data elements, datasets, and each proposed research or reporting project that seeks to use Maryland data.

This framework ensures that Maryland can responsibly leverage broader data sets while maintaining strong oversight, transparency, and public trust.

#### **Clarification Regarding the U.S. Census Bureau Provision**

**Written Testimony - Favorable**

**Jamie Shopland, Appointed Member, Maryland Longitudinal Data System  
Governing Board**

**3915 Braveheart Circle, Urbana, MD 21704**

SB 56 also repeals a prior authorization allowing the MLDS Center to share data with the U.S. Census Bureau for participation in the Post-Secondary Employment Outcomes Explorer (PSEO). That authorization is no longer needed, as the Maryland Higher Education Commission has assumed responsibility for providing the necessary higher education data for PSEO participation. This change appropriately aligns statutory authority with current practice.

**Conclusion**

SB 56 represents a careful, forward-looking approach to strengthening Maryland's data infrastructure. It enables the State to responsibly access broader, multistate data sets, improves the quality of evidence available to policymakers, and supports better decision-making across education and workforce systems.

As a member of the MLDS Governing Board, I am confident that this legislation preserves strong privacy protections, reinforces Board oversight, and positions Maryland to lead in the responsible use of data for public good.

I respectfully urge the Committee to issue a favorable report on SB 56.

Thank you for your consideration.

Respectfully,

Jamie Shopland

Appointed Member, Maryland Longitudinal Data System Governing Board

3915 Braveheart Circle, Urbana, MD 21704

**SB 56 - Testimony - Coleridge - 20260204.pdf**

Uploaded by: Jonathan Mills

Position: FAV

**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:** Jonathan Mills, Vice President, Data Enclave Operations  
The Coleridge Initiative, Inc.  
**Date:** February 4, 2026  
**Position:** Favorable

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Chair Feldman, Vice Chair Kagan, and members of the Senate Committee on Education, Energy, and Environment. Thank you for the opportunity to speak.

My name is Jonathan Mills, and I serve as Vice President of Data Enclave Operations at The Coleridge Initiative. We are a 501(c)(3) non-profit organization focused on working with government agencies to enable the effective, secure use of administrative data for evidence-based policymaking.

I am here today to talk about Coleridge's Initiative's Administrative Data Research Facility (ADRF), a FedRAMP-authorized, secure cloud-based data platform for government, researchers, and policymakers.<sup>1</sup>

### **About Coleridge Initiative**

The Coleridge Initiative was founded in 2018 as a research effort within NYU focused on improving how administrative data is used for evidence-based policymaking. It was grounded in the idea that government administrative records—data collected in the course of running programs—hold tremendous public-policy value if they can be used responsibly and securely. In August 2020, Coleridge became a stand-alone, 501(c)(3) non-profit organization.

Coleridge's mission is to work with government agencies to enable the effective use of data for public decision-making. Coleridge has partnered with multiples state and federal agencies to achieve this goal by:

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<sup>1</sup> FedRAMP ([Federal Risk and Authorization Management Program](#)) is a U.S. government-wide program that standardizes security assessment, authorization, and continuous monitoring for cloud services used by federal agencies, based on security standards established by the National Institute for Standards and Technology (NIST).

- Building new technologies and tools that enable secure access to and sharing of confidential microdata
- Building comprehensive data systems
- Training agency staff to build capacity in modern data analytical skills
- Developing research and data products to communicate findings

Coleridge is supported by a blend of philanthropic investment, competitive grant funding, and state and federal service agreements.

### **The Power of Administrative Data**

Senate Bill 56 would allow Maryland to share student and workforce data with authorized third-party data centers like Coleridge to allow for the examination of critical policy questions. Such data include state workforce and employment data, K12 education data, post-secondary completion data, etc.

These data offer the potential to answer important policy questions like:

- Do job-training or reskilling programs actually increase earnings over time?
- Which credentials or certifications lead to stable employment, not just initial placement?

These data are, however, sensitive. They are powerful for research purposes because they contain personally identifiable information (PII), which allows for linking different datasets to one another (e.g., K12 school records to postsecondary enrollment and completion). Thus, it is critical that data sharing is governed by strict data security and privacy standards. Under SB 56, third-party data centers must demonstrate they have rigorous security, use PII only for data matching, employ privacy techniques (e.g., data hashing), and report results in the aggregate, not at the individual level. Coleridge's Administrative Data Research Facility (ADRF) is an example of a secure data sharing platform that meets SB 56 requirements.

### **What is the ADRF?**

The Administrative Data Research Facility (ADRF) is Coleridge's secure, FedRAMP-authorized cloud-based platform. It's a specialized, highly protected environment where approved researchers can safely use confidential government data to answer important policy questions that support communities. FedRAMP (Federal Risk and Authorization Management Program) is a U.S. government program that sets standardized security and authorization requirements for

cloud systems used by federal agencies. FedRAMP-approved platforms must successfully pass rigorous independent audits and are continuously monitored to meet over 300 of the highest federal security requirements. For states, FedRAMP-authorized platforms offer a widely recognized security benchmark for handling sensitive but unclassified data and can reduce risk, due-diligence burden, and approval time when partnering with federal agencies or sharing data across jurisdictions.

The ADRF was created with support and guidance from key federal agencies, including the Census Bureau and the Office of Management and Budget, to ensure policymakers have strong evidence for their decisions. The ADRF's innovative approach to secure data access was recognized with a Government Innovation Award in 2018.

The ADRF is built on the "Five Safes" data security model. This is a framework used by governments worldwide to ensure that sensitive data is used safely and responsibly.

It covers five layers of protection.

- **Safe Projects:** Only agency-approved projects are hosted in the ADRF, with project environments isolated and access restricted to approved users who have signed agreements.
- **Safe People:** Only authorized, trained researchers who have signed the required agreements can access data. All their activity is monitored.
- **Safe Settings:** The platform provides secure, authorized methods for transferring sensitive agency micro-data (including Personally Identifiable Information) into the ADRF.
- **Safe Data:** Sensitive data is hashed before transmission to the ADRF, and data stewards monitor who is accessing their data, how it is being used, and the status of user agreements.
- **Safe Exports:** Unauthorized removal of any information from the secure environment is prevented.

### **Important Features of the ADRF**

Coleridge works with existing government administrative data—such as education, workforce, and benefits records—allowing approved analysis in secure enclaves without broadly sharing the underlying data. The following sections provide information on how Coleridge accomplishes this through the ADRF.

***Secure Access through a FedRAMP Authorized Environment***

Rather than sending copies of data to researchers:

- Data stays in a secure, isolated environment
- Researchers are granted approved, time-bound access
- Raw data never leaves the enclave
- Outputs undergo multistage disclosure reviews before release

These measures significantly reduce:

- Re-identification risk
- Unauthorized reuse
- Accidental disclosure

***Strong Data Governance***

Strong data governance is at the core of our approach. Coleridge emphasizes that technology alone is not sufficient by using approved protocols that facilitate an agency's data governance and oversight requirements.

Before anyone accesses data:

- Clear legal authority and data-use agreements are established
- Research questions must be approved by authorized data stewards
- Roles, responsibilities, and accountability are explicitly defined
- Agencies retain authority over who, why, and how data is used

This ensures:

- Agencies do not lose control
- Use is purpose-limited
- Decisions are defensible in audits or hearings

***Approved Access for Approved Purposes***

Only those individuals who are approved by data providers to access data can do so in the ADRF.

- Identifiable data is tightly restricted
- Most users work with de-identified or linked datasets<sup>2</sup>

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<sup>2</sup> In collaboration with data curators and technology partners, the Coleridge Initiative developed ADRF Hasher, an application that agency collaborators can use to protect the privacy and confidentiality of their data prior to its transmission to ADRF. The application allows data providers to de-identify data containing personally identifiable or other sensitive information prior to ingestion by replacing sensitive fields with hashed values.

- Access is limited to what is strictly necessary
- All activity is logged and auditable

### ***Output Controls and Disclosure Review***

Users are prevented from unauthorized removal of any information within the secure environment.

The ADRF requires:

- Review of results before export
- Checks for small cell sizes or indirect disclosure
- Approval workflows for publications or downloads

This ensures insights can be released without exposing individuals or sensitive programs.

### **Use Case: The Multi-State Postsecondary Report**

The Multi-State Postsecondary Report (MSPSR) is a collaborative, secure dashboard tool developed by the Kentucky Center for Statistics (KYSTATS) with support from Coleridge Initiative and partner state agencies.<sup>3</sup> It originated to help post-secondary institutions located near state borders to be able to report on the workforce outcomes of their graduates. This reporting was previously difficult due to graduates moving and finding employment across state borders.

The MSPSR integrates linked administrative education and workforce data from multiple states within the Coleridge Initiative's ADRF. This provides comparative insights for policymakers and analysts.

Key features include:

- Cross-State Outcomes: Tracks employment and earnings of completers across participating states.
- Common Standards: Uses agreed-upon definitions for comparable analysis.
- Multi-State Scope: Expanded from Kentucky and Ohio to include Indiana, Tennessee, New Jersey, and Virginia.
- Interactive Dashboard: Allows data exploration by institution, credential, major, and demographic group for evidence-informed policymaking.

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<sup>3</sup> More information on the Multi-State Postsecondary Report is available at: <https://kystats.ky.gov/Latest/MSPSR>

In essence, the MSPSR uses securely linked data to illuminate education-to-employment pathways and evaluate college and workforce outcomes across state lines.

**Closing**

In summary, Senate Bill 56 establishes a standardized process for external collaboration based on high-level security and privacy benchmarks. The legislation will allow the state to collaborate with third-party data centers, such as Coleridge's ADRF, that meet data security and privacy standards. Through these collaborations, the state can examine complex policy questions regarding education and workforce pathways while maintaining strict governance over its data. This approach ensures that individual privacy is protected through mandatory de-identification and aggregate reporting, allowing Maryland to gain actionable insights without compromising security or jurisdictional control.

# Support

Uploaded by: Laurel Cratsley

Position: FAV

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**TO:** Senate Committee on Education, Energy, and the Environment

**BILL:** Senate Bill 56 – Maryland Longitudinal Data System Center - External Data Sharing With Third-Party Data Centers for Multistate Reporting - Authorization

**DATE:** February 4, 2026

**POSITION:** Support

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The Maryland State Board of Education (State Board) and the Maryland State Department of Education (MSDE) extend this letter of support for *SB 56 - Maryland Longitudinal Data System Center – External Data Sharing With Third-Party Data Centers for Multistate Reporting – Authorization*, which seeks to better understand educational and workforce pathways across the Capital Region (Maryland, the District of Columbia, and Virginia).

Under current law, the MLDS Center cannot share individual-level student or workforce data outside the state. As a result, the Center is limited in its ability to track and analyze educational and workforce pathways that cross state lines, which restricts both research and reporting. Nationally, leaders of state longitudinal data systems have recognized that there are limits to what a state can learn by examining only its own data. This is particularly true for Maryland, which borders multiple states and has an interconnected regional economy.

To address these limitations, states have been developing multistate partnerships that allow them to conduct research and analysis capturing movement across state lines. SB56 would amend existing statute to allow the MLDS Center Governing Board to permit sharing of student and workforce data with third-party data centers, under specific conditions, for multistate research and reporting. These changes would enable MLDS to match Maryland data with data from other jurisdictions, specifically the District of Columbia and Virginia, providing a more complete picture of Maryland students' educational and workforce outcomes.

SB56 is intended to support comprehensive, multistate research that allows Maryland's student outcomes to be compared and understood in a broader regional context, while maintaining strong privacy and security protections. It permits limited data sharing only under clearly defined conditions and requires oversight and approval by the MLDS Center Governing Board before any data is shared. The legislation requires that any third-party data center meet rigorous data security standards, including maintaining Federal Risk and Authorization Management Program (FedRAMP) certification, and limits data use to approved research and reporting purposes. Personally identifiable information may be used only as necessary to securely match records across jurisdictions, after which data must be de-identified, with only aggregate results permitted for public reporting. Together, these safeguards enable meaningful cross-state analysis while protecting the privacy of Maryland students and workers.

The State Board and MSDE respectfully request that the committee consider this information as it deliberates on SB 56. Please contact Laurel Cratsley, Interim Executive Director of Government Affairs, at [laurel.cratsley@maryland.gov](mailto:laurel.cratsley@maryland.gov) or at 443-571-5461, if you would like any additional information.

# **Michael\_Butkiewicz\_SB56\_ExternalDataSharing\_2026.**

Uploaded by: Michael Butkiewicz

Position: FAV

**Michael Butkiewicz**  
**9904 Belhaven Road, Bethesda, Maryland 20817**

**Senate Education, Energy, and the Environment Committee**

**SB 56 Maryland Longitudinal Data System Center - External Data Sharing With  
Third-Party Data Centers for Multistate Reporting - Authorization**

**Bill Hearing Date February 4th, 2026**

**Position: Favorable**

Dear Chair Feldman, Vice Chair Kagan, and Honorable Committee Members,

My name is Michael Butkiewicz. I am an author and civic-education researcher from Montgomery County, and my work has appeared across regional outlets. I write today in support of SB 56, which establishes a new gated mechanism for sharing Maryland student and workforce data with third-party multistate data centers.

While the bill is thoughtfully constructed, it is necessary to be candid about its limitations. The third gate, though admirable in purpose, assumes a level of Board attentiveness and technical literacy that may not be feasible in practice. As BCI Build reports, the DMV region has “seen a significant concentration” of data centers, and more than 402 million terabytes of data are created each day.<sup>1</sup> In this environment, it is reasonable to question whether the Board is structurally equipped to manage such expansive and growing demands.

Comparable state longitudinal data systems indicate that reviewing a single data-use request can require several hours of staff time, and reviewing a dataset schema can require days. Requiring Board-level approval for each element, dataset, and project would multiply this workload substantially.

Even with these concerns, I am compelled to support this legislation. Given the rapid expansion of private-sector data-center deployment around Maryland, strengthening our processes, particularly within the first two gates, to ensure that any third-party data center meets tightened statutory and privacy requirements is essential to protecting Marylanders.

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<sup>1</sup> Planned Data Center Construction in the DMV (BCI Build)

Data governance and privacy safeguards are vital on their own, but their importance grows as private-sector demand increases, especially among firms that, whether justifiably or not, often fail to meet meaningful standards of transparency.

An OECD report from late 2019 noted that data access and sharing “has not achieved its potential,” citing uncertainties about data ownership and reliance on opaque contractual agreements.<sup>2</sup> This concern is echoed in a 2019 Pew Research Center study finding that roughly half of Americans feel they have no control over who can access their online searches, and that most believe companies would not publicly acknowledge misusing consumer data.<sup>3</sup>

***Please report favorably on SB 56.***

Thank you.

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<sup>2</sup> Enhancing Access to and Sharing of Data (OECD, 2019)

<sup>3</sup> Americans and Privacy: Concerned, Confused and Feeling Lack of Control Over Their Personal Information (Pew Research Center, 2019)

# **MLDSC Bill Hearing Testimony\_final.pdf**

Uploaded by: Monica Dodge

Position: FAV

Good afternoon Chairman Feldman and members of the Senate Education, Energy and Environment Committee. My name is Monica Dodge, and I am honored to serve as the Executive Director of the District of Columbia's Office of Education Through Employment Pathways. I am here today to speak in support of [SB 56 - Maryland Longitudinal Data System Center - External Data Sharing With Third-Party Data Centers for Multistate Reporting - Authorization](#),

As this body knows well, the National Capital region, which includes Baltimore, Washington, DC and Richmond is the third largest regional economy in the United States and the seventh largest regional economy in the world. Among the region's 10.2 million residents, 20% cross state lines daily for their jobs. We know that our economy operates as a region, and so as we make decisions about how to respond to economic conditions, it is critical that we are able to examine outcomes as a region as well.

We sit at an extremely exciting moment. For the first time, stakeholders from Maryland, Virginia and the District have agreed to partner to understand educational and economic outcomes in our region, rather than being limited to examining data within our own jurisdictions.

Despite the value of this work, this collaboration will not be possible without the passage of SB 56, which will allow the Maryland Longitudinal Data System (MLDS) Governing Board to authorize the Maryland Longitudinal Data System Center (MLDSC) to share data about Maryland students and workers and match them with similar data from DC and Virginia to facilitate the analysis of K-12, higher education, and workforce pathways across the Capital Region. As a result, this bill will allow for this body and Maryland stakeholders across the state to more fully understand the paths that Maryland students are taking after high school graduation, including those who are employed in the District of Columbia and Virginia, information that has never been available to MLDSC before.

MLDSC is a national model for generating timely and accurate information about student performance that can be used to improve the State's education system and guide decision makers at all levels. I can say confidently that, in the creation of DC's Education Through Employment System, we have greatly benefited from learning from MLDSC's model and are grateful for their partnership. MLDSC is extremely comprehensive in its data coverage, and this project will address the largest gap that MLDSC has faced since its creation – a view into those who leave the state.

This bill will allow for clearer information to make more informed decisions to better serve our region, and I strongly encourage you to pass this legislation. I am happy to answer any questions you may have.

# **Testimony in support of SB0056 - External Data Sha**

Uploaded by: Richard KAP Kaplowitz

Position: FAV

02/04/2026

Richard Keith Kaplowitz  
Frederick, MD 21703

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**TESTIMONY ON SB#/0056- POSITION: FAVORABLE**

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**Maryland Longitudinal Data System Center - External Data Sharing With Third-Party Data Centers for Multistate Reporting – Authorization**

**TO:** Chair Feldman, Vice Chair Kagan, and members of the Education, Energy and the Environment Committee

**FROM:** Richard Keith Kaplowitz

**My name is Richard Keith Kaplowitz. I am a resident of District 3, Frederick County. I am submitting this testimony in support of SB#/0056, Maryland Longitudinal Data System Center - External Data Sharing With Third-Party Data Centers for Multistate Reporting – Authorization**

This bill adds data protection guardrails to any data sharing with third-party data centers or where data is used outside of Maryland. It is necessary to protect Marylanders from the deprivations that the Federal Government has been inflicting on our country.

As reported by NPR on 01/26/26 “*The Trump administration admits even more ways DOGE accessed sensitive personal data*”<sup>1</sup>

...the Social Security Administration said it discovered DOGE employees at the agency secretly and improperly shared sensitive personal data last year... The admission came in a [court filing last Friday](#), Jan. 16, that made numerous corrections to testimony given by top agency officials last year in a lawsuit alleging that DOGE was illegally accessing Social Security data.

The intent of this bill is to authorize the Governing Board of the Maryland Longitudinal Data System Center to provide certain student and workforce data to a third-party data center under certain circumstances; requiring each third-party data center to agree to comply with certain requirements relating to the data the center receives; requiring the Center to enter into a written data sharing agreement with certain third-party data centers; etc.

This bill will give our state the tools needed to fight misuse of Maryland data.

**I respectfully urge this committee to return a favorable report on SB#/0056.**

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<sup>1</sup> <https://www.npr.org/2026/01/23/nx-s1-5684185/doge-data-social-security-privacy>

# **SB 56 - Testimony\_MLDSC.pdf**

Uploaded by: Ross Goldstein

Position: FAV



# MLDS CENTER

Maryland Longitudinal Data System

Address 550 West Baltimore Street  
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Phone 410-706-2085  
Email [mlds.center@maryland.gov](mailto:mlds.center@maryland.gov)  
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## 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

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### 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's<sup>1</sup> *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.

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<sup>1</sup> 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.

# **MD SB56 Testimony.pdf**

Uploaded by: Tod Massa

Position: FAV



## COMMONWEALTH of VIRGINIA

STATE COUNCIL OF HIGHER EDUCATION FOR VIRGINIA

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Maryland Senate  
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Chairman Feldman,

As Director of Policy Analytics and the Virginia Longitudinal Data System Lead, and as a long-time admirer of the work done by my colleagues at the Maryland Longitudinal Data System, I write in support of SB 56.

For the last twenty years, the development and evolution of state longitudinal data systems have produced data-driven results to guide policy decisions within their state. They have, however, been hampered by the fact that they are limited to the individual state in which they are developed and granted authority to operate. Unfortunately, not all the questions asked by policymakers stop at the border of their states. Questions such as:

“How do our college graduates perform in the workplace? What are their earnings over time?”

“What do we know about the number of individuals who live in Virginia and work in DC or Maryland?”

“We know some of our high school students transfer to other states, are they well-prepared if they do?”

Virginia’s experience with the Post-Secondary Employment Outcomes project hosted by the US Census Bureau through the division of Longitudinal Employer-Household Dynamics has been invaluable in adding additional information to the reporting we have done on program-level wage and debt outcomes of graduates from our public and private institutions in the Commonwealth. Likewise, our partnership in the expanded Multi-State Post-Secondary Report with Kentucky, New Jersey, Ohio, Rhode Island, Tennessee, and Virginia has not only reaped benefits in new insights of college graduate outcomes but has also expanded staff knowledge and skills from working with multiple states to create datasets matching in content and individual identities (where such matches exist).

Finally, the potential benefits of Maryland, Washington, DC, and Virginia, being able to work together towards a shared understanding of the permeability of our borders and the number of citizens we “share” is likely far greater than we realize.

I hope the Committee sees the value in passing this bill to the full Senate with it ultimately being signed into law.

Respectfully,

A handwritten signature in black ink, appearing to read 'T. Massa', with a long horizontal flourish extending to the right.

Tod R Massa  
Policy Analytics Director and VLDS Lead  
State Council of Higher Education for Virginia

# **SB0056 – Maryland Longitudinal Data System Center**

Uploaded by: Alicia Baines

Position: UNF

## **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:

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

- 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,

**Alicia Baines**

Maryland Parent & Special Education Advocate