



MLDS CENTER

Maryland Longitudinal Data System

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Memorandum

To: Governing Board
From: Ross Goldstein
Date: September 2, 2022
Subject: Proposed Legislation for 2023

Background

In 2021, legislation was passed that amended Education Article § 7-212(c), Annotated Code of Maryland (see [Chapter 577](#)), to establish the following requirement:

- (1) *On or before July 1 each year, beginning in 2023 and ending in 2028, each county board shall report to the Maryland Longitudinal Data System on:
 - (i) *The number of students who completed and submitted the FAFSA in the immediately preceding school year;*
 - (ii) *The number of students who did not complete and submit the FAFSA in the immediately preceding school year; and*
 - (iii) *The number of students who completed the FAFSA by the deadline for eligibility for State financial aid.**
- (2) *A county board shall report the data required under paragraph (1) of this subsection, disaggregated by high school.*
- (3) *On or before October 1 each year, beginning in 2023 and ending in 2028, the Maryland Longitudinal Data System shall disaggregate the information reported under this subsection and submit a report to the Senate Education, Health, and Environmental Affairs Committee, the House Appropriations Committee, and the House Committee on Ways and Means, in accordance with § 2-1257 of the State Government Article.*

As discussed during the June Governing Board meeting, the current provision presents two issues. The first issue is whether the current plan of the MLDS Center collecting Free Application for Federal Student Aid (FAFSA) completion data directly from LEAs is the most efficient and informative method to accomplish the goal of providing the General Assembly with information on this topic. The second issue is whether, as currently written, the reporting requirement is properly assigned to the MLDS Center. The requirements in § 7-212(c) are inconsistent with the type and nature of reporting the MLDS Center conducts. First, the data that the LEAs are required to provide to the MLDS Center are aggregate data, not unit record level student data. This means that the Center cannot meaningfully match and incorporate those data into the MLDS or analyze the data for cross-sector, longitudinal outcomes. Second, the report

required under § 7-212(c) is a single sector report containing only data from the K-12 sector. Finally, § 7-212(c) requires the MLDS Center to collect data directly from the LEAs. However, MSDE is the agency that LEAs report to and MSDE has the administrative expertise and oversight to effectively manage data collections.

Proposed Changes

Since the discussion at the June meeting, staff and counsel at MHEC and MLDS have explored the feasibility of the MLDS Center having direct access to the FAFSA application data in the federal Student Aid Gateway and the Maryland College Aid Processing System (MDCAPS). This access would allow the Center to directly collect FAFSA completion information at the student level, incorporate the FAFSA completion data into the MLDS, and match those data against data already submitted to the MLDS Center by MSDE. This approach would also allow for more in-depth analysis and reporting should it be requested. This approach would also remove an additional reporting requirement for LEAs.

Education Article

§ 7-212

(c) (1) On or before [July] **October** 1 each year, beginning in [2023] **2024** and ending in 2028, [each county board shall report to] the Maryland Longitudinal Data System **Center shall submit a report, with the following information to the Senate Education, Health, and Environmental Affairs Committee, the House Appropriations Committee, and the House Committee on Ways and Means, in accordance with § 2-1257 of the State Government Article:**

(i) The number of students who completed and submitted the FAFSA in the immediately preceding school year;

(ii) The number of students who did not complete and submit the FAFSA in the immediately preceding school year; and

(iii) The number of students who completed the FAFSA by the deadline for eligibility for State financial aid.

(2) [A county board shall report the data required under paragraph (1) of this subsection, disaggregated by high school.

(3) On or before October 1 each year, beginning in 2023 and ending in 2028, the] **The** Maryland Longitudinal Data System shall disaggregate the information reported under this subsection **by county and other student subgroups** [and submit a report to the Senate Education, Health, and Environmental Affairs Committee, the House Appropriations Committee, and the House Committee on Ways and Means, in accordance with § 2-1257 of the State Government Article.]

(3) To facilitate the reporting required under this subsection, the Maryland Higher Education Commission shall provide the Maryland Longitudinal Data System Center with access to student FAFSA data contained in the Student Aid Gateway System and data collected by the Office of Student Financial Aid.

Action

Approval to pursue this legislative change.