



MLDS CENTER

Maryland Longitudinal Data System

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MEMORANDUM

TO: MLDS Governing Board
FROM: Molly B. Abend, Data Management Coordinator
Ross Goldstein, Executive Director
DATE: December 6, 2024
SUBJECT: MLDS Center Suppression Policy Update

Purpose

The purpose of this agenda item is to provide an update to the Governing Board on the MLDS Center's new [Suppression Policy for Disclosure Avoidance](#), including a draft Disclosure Review Advisory Board Charter document.

Background

As specified in Education Article § 24-703(h), Annotated Code of Maryland, the MLDS Center may only use aggregate data in the release of data in reports and in response to data requests. The law also specifies that data that may be identifiable based on the size or uniqueness of the population under consideration may not be reported by the Center. The Center implemented that requirement by following the guidance of the National Center for Education Statistics in its technical brief entitled, *Statistical Methods for Protecting Personally Indefinable Information in Aggregate Reporting*. That guidance states that values less than 10 (whether directly disclosed or that can be derived) should be suppressed.

That bright line approach is straightforward and provides strong assurance against inadvertent disclosure of personal information. However, the approach does not allow for exceptions when disclosure risk is minimal. It also does not provide a process for a more nuanced approach that would allow the Center to weigh disclosure risk against the needs of policy makers to have comprehensive and meaningful information to guide decision making. As a result, over time the Center has established exceptions to the strict approach established in the NCES guidance document. A new suppression policy was proposed and approved at the September 13, 2024 Governing Board meeting and starts with the NCES standard, documents exceptions the Center has been using, and establishes an ongoing and transparent process for addressing suppression moving forward.

Disclosure Review Advisory Board

The policy explains that as part of the MLDS Center's suppression procedures, a Disclosure Review Advisory Board will be implemented to help assess when to relax the baseline approach in cases where the risk of disclosure is minimal and there is a need for more complete reporting.

The timeline for implementing the *Disclosure Review Advisory Board* is below:

Task	Deadline/Date
Advisory Board Introductory Meeting	9/27/24
Create Advisory Board Implementation Plan and Draft Charter	10/11/24
Present Implementation Plan and Draft Charter to Data GAB	10/17/24 and 11/21/24
Advisory Board Meeting #1	11/22/24
Present Implementation Plan and Draft Charter to RPB	12/6/24
Present Implementation Plan and Draft Charter to Governing Board	12/13/24
Advisory Board Meeting #2	1/24/25

The MLDS Center held an introductory meeting of the Disclosure Review Advisory Board (DRAB) on September 27, 2024 and provided an overview of the suppression policy and the implementation plan and discussed a time-sensitive data release. The MLDS Center worked internally to develop a draft purpose statement for DRAB’s charter document and reviewed the purpose with Data GAB on October 17, 2024. Based on Data GAB’s feedback, the MLDS Center revised the purpose statement and reviewed these updates at the November 21, 2024 Data GAB meeting.

The Advisory Board held its first official meeting on November 22, 2024 and discussed the Purpose, Membership, and Meetings sections of the draft charter. The charter is being shared at the December Governing Board meeting and the next DRAB meeting is scheduled for January 24, 2025.

Action

Informational.

Attachment

MLDS Center Charter For the Disclosure Review Advisory Board November 2024



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Maryland Longitudinal Data System (MLDS) Center

Disclosure Review Advisory Board

Purpose

The Disclosure Review Advisory Board (DRAB) is established to ensure ongoing input and participation from MLDS Center's key stakeholders and to assist the Governing Board with oversight of Center operations. As described in detail below, the DRAB will provide input and consultation on the MLDS Center's suppression policy and procedures, the implementation of the policy and procedures, and disclosure risks.

1. **Suppression Policy and Procedures** - DRAB will assist the Center in its development and annual review of the Suppression Policy and Procedures. DRAB will review documented MLDS Center exceptions and consider any new proposed exceptions. DRAB will also evaluate the policy and procedures in the context of relevant State and federal laws and regulations.
2. **Evaluate Disclosure Risks** - The MLDS Center produces multiple types of reports, research, and other projects that must undergo a suppression review with a baseline approach to suppress any value less than 10. Prior to the release of reports, research, and other projects that contain descriptive statistics, the Center may, at its discretion, request DRAB consider disclosure avoidance methodologies, their impact on disclosure and re-identification risk and their impact on public confidence.
3. **Review Suppression Implementation** - DRAB will review the results of the suppression requirements and disclosure avoidance techniques and review the usefulness of the reported data. Members will consider any possible limitations with the release of the suppressed data in reports, research, and other projects, including potential misinterpretations, false or misleading conclusions, etc.
4. **Review Best Practices** - DRAB will evaluate current suppression best practices used by state, federal, and other organizations for possible adoption in the MLDS Center's Suppression Policy and Procedures.



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Membership

Standing members of the Disclosure Review Advisory Board will consist of:

1. Representatives of the MLDS Governing Board members;
2. MLDS Center Branch Directors;
3. A data expert that regularly attends the MLDS Center Data Governance Advisory Board;
4. A policy expert that regularly attends the MLDS Center Research and Policy Advisory Board;
5. A representative from the Maryland Department of Legislative Services; and
6. Other key stakeholders identified by the Executive Director.

Standing members act as representatives of their organizations. Standing members are expected to attend all DRAB meetings or notify the Executive Director of the individual that will be representing the organization in their absence. Standing members are responsible for representing the position of their organizations and relaying the content of the meeting to appropriate members of their organizations.

Additionally, the Disclosure Review Advisory Board may include ad hoc members such as:

1. Experts in disclosure avoidance practices; and
2. Subject matter experts and practitioners identified by the Executive Director.

Ad hoc members will be invited to participate when their expertise can provide insight on disclosure avoidance techniques and topics.

All members will obtain “View Only Access” and comply with requirements described in the [Staff Authorization and Access Procedures](#).

Meetings

The Disclosure Review Advisory Board will meet on the fourth Friday of each month unless otherwise noted by the Executive Director or DRAB Chair. Additional meetings may be held if necessary. The MLDS Center Data Management Coordinator will serve as the facilitator for the meetings. The Advisory Board will follow a predefined agenda to conduct the meetings. Meetings may be either in person, or via conference call or Webinar coordinated by MLDS Center staff. A meeting invitation and meeting materials will be distributed to standing members of DRAB and other invited attendees one week in advance of each meeting. Meetings will not be electronically recorded.

Drafted – November 22, 2024