



Memorandum

To: Governing Board Members
From: Ross Goldstein, Executive Director
Date: September 5, 2025
Subject: Proposed Legislation

The MLDS Center is proposing legislation (see attached) to permit the Governing Board to authorize the Center to provide student and workforce data to the Administrative Data Research Facility managed by the Coleridge Initiative.

Overview

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. Over the past several years, the Coleridge Initiative has emerged as the most comprehensive resource for multistate partnerships; combining the highest level of technical expertise and infrastructure with a robust governance and procedural framework.

Multistate Partnership Opportunity

The MLDS Center and its counterparts in Washington D.C. and Virginia submitted a joint grant application to the Coleridge Initiative's *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 a change in state law to authorize the Center to disclose individual level student and workforce data (including personally identifiable information).

Coleridge Initiative and the Administrative Data Research Facility (ADRF)

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 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.

Legal Changes

The proposed legislative change (see attached) would allow the Governing Board to authorize the Center to provide individual-level student and workforce data to the ADRF 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 ADRF data security meets or exceeds the data security implemented by the Center, including confirming that the ADRF 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 Coleridge Initiative, Incorporated, to comply with state and federal laws relating to data privacy.

Notably, items 3, 4, and 5 mirror the data use and disclosure requirements 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 to be provided and to approve each proposed research or reporting project that seeks to use Maryland data in the ADRF.

U.S. Census Bureau

In 2024, the General Assembly passed legislation allowing the Governing Board to send student information to the United States Census Bureau (see Ed. Art., § 24-703.2(e), Annotated Code of Maryland). This proposed legislation repeals that authorization. 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. Since the Maryland Higher Education Commission has taken the lead and is providing the requisite data for participation with PSEO, this provision is no longer needed.

It is worth highlighting some of the differences between working with Census and the ADRF. Census receives state data for the purpose of their project. Census dictates what data elements are required and they decide what additional research they want to conduct with the data. In comparison, with the ADRF, Maryland will decide which data are used and what research is done using the data. Further, the research design with the ADRF and our Capital Region Partners will explore more than just college graduates and their workforce outcomes. Outcomes of non-graduates, apprenticeship completers, and other pathways from high school to the workforce can be explored.

Action

I request the Governing Board approve the proposed legislation.

A BILL ENTITLED

AN ACT concerning

Maryland Longitudinal Data System Center – External Data Sharing - Multistate Reporting

FOR the purpose of authorizing the Governing Board of the Maryland Longitudinal Data System Center to authorize the Center to provide certain student and workforce data to the Administrative Data Research Facility to enable certain multistate reporting; requiring the Governing Board to ensure certain criteria are met before authorizing data sharing; eliminating authorization to share data with the U.S. Census Bureau; and generally relating to the Maryland Longitudinal Data System Center.

By repealing and reenacting, with amendments

Article - Education

Section 24-703.2

Annotated Code of Maryland

(2022 Replacement Volume and 2025 Supplement)

BY adding to

Article - Education

Section 24-703.4

Annotated Code of Maryland

(2022 Replacement Volume and 2025 Supplement)

24–703.2.

(a) (1) In this section the following words have the meanings indicated.

(2) “Aggregated data” means de–identified data that is summarized by type of program of study or educational institution.

(3) “Student information” means:

(i) Student Social Security number;

(ii) Program of study;

(iii) Enrollment; and

(iv) Name of educational institution.

(4) “Tax information” means income tax records, wage information, and other data stored by the Comptroller.

(b) (1) The Center and the Comptroller jointly shall develop a protocol for research purposes for the:

(i) Center to send student information to the Comptroller;

(ii) Comptroller to match student information to tax information; and

(iii) Comptroller to produce aggregated data from the matched information on the average amount of wage or salary earnings from self-employment or other sources of income for individuals within each educational institution or program of study.

(2) The Comptroller may not produce any aggregated data that may be identifiable based on the size or uniqueness of the population under consideration.

(c) The Center and the Comptroller jointly shall develop data handling and security standards for the Comptroller to utilize for the protocol, including:

(1) Data retention and disposition policies;

(2) Authorized access and authentication for authorized access policies;

(3) Privacy compliance standards; and

(4) Breach notification and procedures.

(d) The Comptroller shall comply with any data privacy and security standards in accordance with the federal Family Educational Rights and Privacy Act and other relevant privacy laws and policies.

[(e) The Governing Board may authorize the Center to send student information to the United States Census Bureau.]

24-703.4

(A) IN THIS SECTION THE FOLLOWING WORDS HAVE THE MEANINGS INDICATED.

(1) “ADMINISTRATIVE DATA RESEARCH FACILITY” OR “ADRF” MEANS THE FEDRAMP CERTIFIED, SECURE CLOUD-BASED PLATFORM ESTABLISHED BY THE COLERIDGE INITIATIVE, INCORPORATED.

(2) “FEDERAL RISK AND AUTHORIZATION MANAGEMENT PROGRAM” OR “FedRAMP” IS THE FEDERAL GOVERNMENT PROGRAM MANAGED BY THE U.S. GENERAL SERVICES ADMINISTRATION THAT PROVIDES A STANDARDIZED APPROACH TO SECURITY ASSESSMENT, AUTHORIZATION, AND CONTINUOUS MONITORING FOR CLOUD PRODUCTS AND SERVICES.

(B) THE GOVERNING BOARD MAY AUTHORIZE THE CENTER TO PROVIDE INDIVIDUAL-LEVEL STUDENT AND WORKFORCE DATA, WHICH MAY INCLUDE PERSONALLY IDENTIFIABLE INFORMATION, TO THE ADRF TO ENABLE MULTISTATE RESEARCH AND REPORTING ON STUDENT OUTCOMES.

(C) (1) BEFORE GRANTING AUTHORIZATION UNDER SUBSECTION (B) OF THIS SECTION, AND ANNUALLY THEREAFTER, THE GOVERNING BOARD SHALL ENSURE THAT THE FOLLOWING CONDITIONS ARE MET:

(I) THE ADRF DATA SECURITY MEETS OR EXCEEDS THE DATA SECURITY IMPLEMENTED BY THE CENTER, INCLUDING CONFIRMING THAT THE ADRF REMAINS A FedRAMP AUTHORIZED AND CERTIFIED PLATFORM;

(II) 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;

(III) ONLY DE-IDENTIFIED DATA ARE USED FOR ANALYTIC PURPOSES;

(IV) ONLY AGGREGATE DATA ARE RELEASED IN REPORTS AND OTHER OUTPUT; AND

(V) AGGREGATE DATA THAT MAY BE IDENTIFIABLE BASED ON THE SIZE OR UNIQUENESS OF THE POPULATION UNDER CONSIDERATION ARE NOT REPORTED IN ANY FORM.

(VI) WRITTEN DATA SHARING AGREEMENTS ARE IN PLACE BETWEEN THE MLDS CENTER AND THE COLERIDGE INITIATIVE, INCORPORATED, TO COMPLY WITH STATE AND FEDERAL LAWS RELATING TO DATA PRIVACY.

(2) THE GOVERNING BOARD SHALL APPROVE:

(I) THE DATA ELEMENTS THAT COMPRISE EACH DATA SET PROVIDED TO THE ADRF;

(II) EACH DATA SET THAT IS TO BE PROVIDED TO THE ADRF; AND

(III) EACH PROPOSED RESEARCH OR REPORTING PROJECT THAT SEEKS TO USE MARYLAND DATA PROVIDED TO THE ADRF.

SECTION 2. AND BE IT FURTHER ENACTED, That this Act shall take effect on June 1, 2026.

Timeline for Participation with Coleridge's ADRF

Date	Action
September 12, 2025	Governing Board Meeting – consider and approve legislative proposal
September 2025	Governor's Legislative Office – review and approve legislative proposal
January – April 2026	General Assembly – Consider and enact legislation allowing participation with multistate data sharing with Coleridge's ADRF
April - May 2026	MLDS Center <ul style="list-style-type: none"> - Develop procedures for working with Coleridge's ADRF - Develop a data sharing agreement with Coleridge to be executed following Governing Board authorization to share data with Coleridge's ADRF.
June 12, 2026	Governing Board Meeting: <ul style="list-style-type: none"> - Authorize data sharing with Coleridge's ADRF - Review and approve data elements - Approves population parameters to include in the data set - Review and approve Capital Region Multistate Report
June 30, 2026	Data Sharing Partners – amend data sharing agreements as needed to allow redisclosure of data.
July 1, 2026	MLDS Center - Send approved data to Coleridge's ADRF
June 11, 2027	Governing Board Meeting: <ul style="list-style-type: none"> - Reauthorize data sharing with Coleridge's ADRF - Review and approve data elements and sets - Consider any new projects that use MLDS data