MLDS Center
Maryland Longitudinal Data System

Address 550 West Baltimore Street
Baltimore, MD 21201
Phone 410-706-2085
Email mlds.center@maryland.gov
Website mldscenter.maryland.gov

Memorandum

TO: MLDS Governing Board

FROM: Ross Goldstein, Executive Director

DATE: September 4, 2026

SUBJECT: 2026 Legislation

Departmental Legislation

The MLDS Center proposes amending the statutory requirement that imposes a 20 year limit on how long student data may be linked to workforce data within the Maryland Longitudinal Data System (MLDS). Instead of a strict limit defined in statute, the proposal seeks to authorize the Governing Board to establish an appropriate, research and policy informed delinking policy.

Overview

Longitudinal data systems depend on many years of continuous data in order to generate and provide meaningful insights. Maryland law currently requires the MLDS Center to unlink an individual's workforce record 20 years after that individual's last education record. No other state with a State Longitudinal Data System imposes a limit of this kind. Amending or repealing this restriction is critical to support long-term policy relevant research and reporting on education and workforce outcomes in Maryland.

Background

Education Article § 24-702(c) states that "linkage of student data and workforce data for the purposes of the Maryland Longitudinal Data System (MLDS) shall be limited to no longer than 20 years from the date of latest attendance in any educational institution in the State". The original MLDS statute limited the linkage of education and workforce records to only 5 years. In 2017, state law was amended (Chapter 791) to extend from 5 to 20, the number of years that records can be linked.

The MLDS contains education records beginning with the 2007-2008 cohort. Under the current statute, individuals with no new education record after 2007-2008 must be delinked from wages records beginning in 2028 . This results in an inconsistent analytic window for students from the same cohort and lowers the ability to compare outcomes for those who continue their education and those who do not. It should also be noted that while data must be de-linked, the data does not need to be removed from the system.

Effects on Research and Reporting Outputs

At the December 2025 MLDS Governing Board Meeting, members recommended that the MLDS Center undertake a review on the impact of the delinking requirement on MLDS Center research and reporting. The quantitative analysis (Appendix A) projected a substantial amount of delinking that would be required if the 20 year limitation remains in place. The qualitative analysis (Appendix B), which included a survey of data users (Appendix C), provided feedback and insights regarding the significant negative impacts of delinking.

<u>Proposed Amendment to Education Article</u>

§24–702

(c) **(1) THE GOVERNING BOARD SHALL ESTABLISH LIMITS ON THE [**The**]** linkage of student data and workforce data for the purposes of the Maryland Longitudinal Data System **[**shall be limited to no longer than 20 years from the date of latest attendance in any educational institution in the State**]**.

(2) IN ESTABLISHING THE LIMITS REQUIRED UNDER PARAGRAPH (1) OF THIS SUBSECTION, THE GOVERNING BOARD SHALL BALANCE THE NEED TO PROTECT STUDENT PRIVACY AND DATA SECURITY WITH THE NEED TO MAINTAIN DATA FOR A SUFFICIENT PERIOD OF TIME TO SUPPORT RESEARCH AND REPORTING THAT INFORMS STATE POLICY AND DECISION MAKING.

(3) THE GOVERNING BOARD SHALL REVIEW THE LIMITS ESTABLISHED UNDER THIS SUBSECTION EVERY FIVE YEARS TO DETERMINE WHETHER THE LIMITS CONTINUE TO BE NECESSARY AND APPROPRIATE FOR THE PURPOSES OF THE MARYLAND LONGITUDINAL DATA SYSTEM.

<u>Action</u>

Approve submission of the proposed Departmental Legislation to the Governor’s legislative office.

Mandatory Reports - Review

<u>Overview</u>

State Government Article § 2-1209, Annotated Code of Maryland, directs the Department of Legislative Services, in consultation with agencies, to review mandatory reporting requirements and make recommendations to repeal or modify those statutory requirements if the reports are no longer warranted because they have become obsolete, duplicative, impractical, inefficient, or otherwise unnecessary.

MLDS Center staff has reviewed the list of its mandatory reporting requirements. The initial recommendations to keep, repeal, or modify the reporting requirements can be found in Appendix D. The initial recommendations were shared with RPB, which did not raise any objections to the Center’s recommendations.

<u>Review Criteria</u>

The review process considered the following factors:

1. The time and resources necessary to produce the report,
2. Whether similar information is being provided by another source (i.e another state agency, the federal government or another MLDS Center report or dashboard);
3. Whether MLDS data is available or sufficient to answer the required questions;
4. Evidence that the Governor or General Assembly relies on the report for policy decision making;
5. The need for an annual report in light of the fact that data trends are not changing over time; and
6. Whether the desired information can be provided more efficiently by a dashboard that would require less time and resources to produce or is already provided in another report or dashboard produced by the Center.

<u>Action</u>

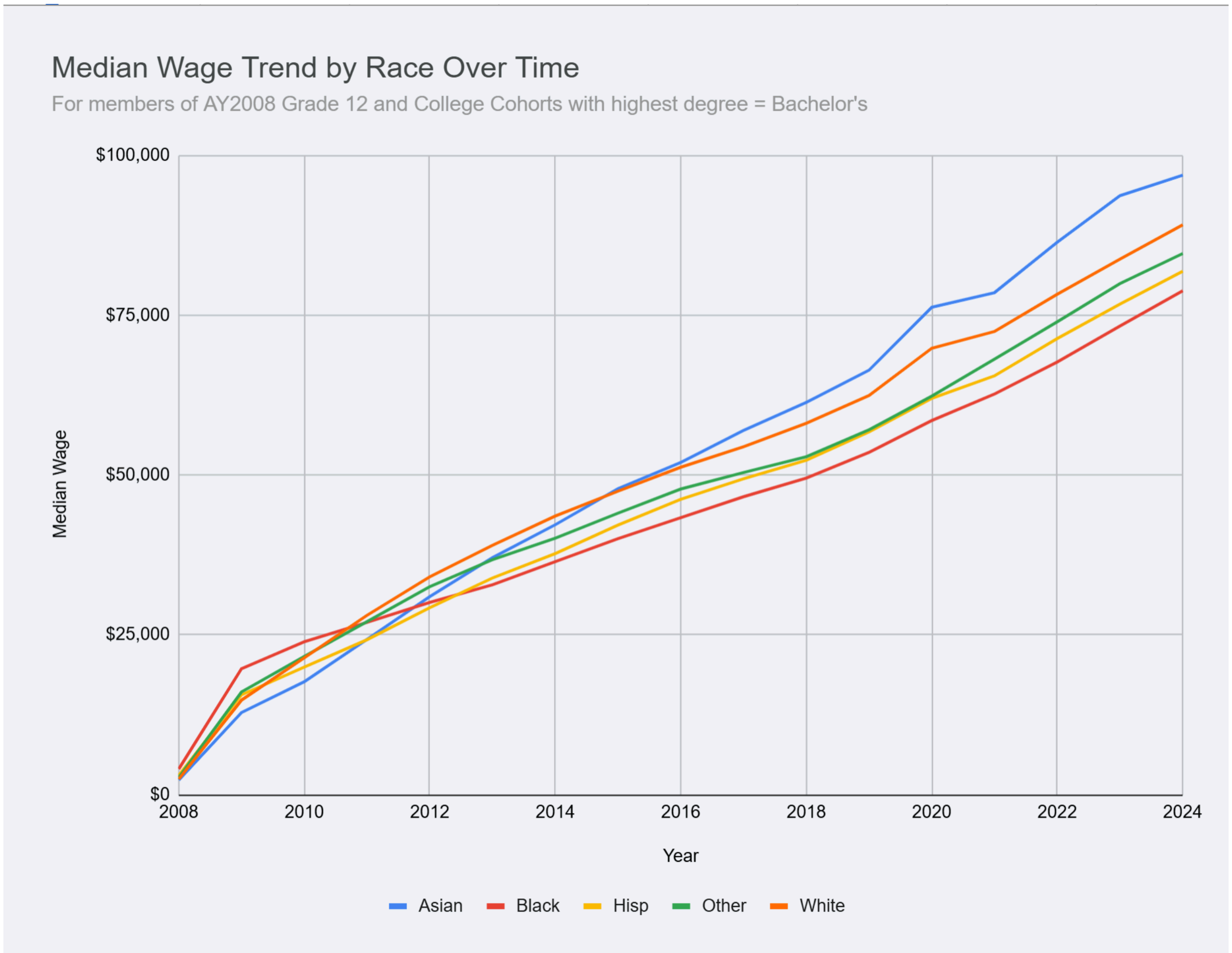
Review and approve the recommendations provided in Appendix D.

Appendix A: Quantitative Analysis

MLDS Staff conducted an analysis to assess the magnitude and impact of the delinking requirement using current data in the MLDS. The analysis projected the percentage of individuals whose wage records would be delinked under a 20 year limitation, assuming no additional college attendance occurs between 2026 and 2030. Please note, approximately 5 percent of Maryland public high school graduates from the 2008 cohort did not have a postsecondary attendance record in Maryland until more than 10 years after high school. This pattern is not captured in the projection assumptions and suggests that the projected delinking percentages are likely overstated by a few percentage points. Below is a summary of the findings.

1. In 2028, an estimated **46.7%** of Maryland State Department of Education high school records and **50.3%** of Maryland Higher Education Commission postsecondary records would require delinking because no new education record occurred after students' 2008 high school graduation.
2. The chart below displays wage outcomes for Grade 12 Maryland public high school graduates in the 2007-2008 academic year who went on to earn a Bachelor's degree. The chart includes 16 years of wage data and demonstrates steady wage growth over time. However, the chart does not capture the complete wage-growth trajectory. Access to wage information beyond the 20 year limit is necessary to fully assess long-term wage trends, particularly for individuals whose wages continue to increase well into their career.
3. Findings from the MLDS Center's annual Career Preparation Expansion Act report further underscores the need to amend or appeal the current 20 year limit. The report illustrates that wage trajectories continue to increase well beyond the early career period. The report demonstrates the need and importance of longitudinal wage data when examining long-term earnings.

Chart 1: Median Wage Trends by Race for AY2008 Grade 12 and College Cohorts with Highest Degree of Bachelor's



Appendix B: Qualitative Analysis

The Research Branch compiled information from 17 researchers to understand the negative impacts of the proposed 20-year limit on linking educational and workforce data in the Maryland Longitudinal Data System (MLDS) on high-quality, policy-relevant research. The consensus among the researchers was that a 20-year limit prevents the study of long-term effects of education policies and interventions, comprehensive cost-benefit analyses, and life-course perspectives—especially since peak earning potential may not be reached until 35 years after high school. Researchers emphasize that this limit would introduce bias by disproportionately removing wage data for individuals who follow non-traditional or delayed educational pathways. State Longitudinal Data Systems in other states and national longitudinal studies link data from individuals for far longer periods to provide valid research to improve the understanding of long-term educational and workforce opportunities.

In summary, researchers would like to see the legislative restriction removed, for two main reasons.

1. **The restriction prevents the study of long-term effects of education policies and interventions, comprehensive cost-benefit analyses, and life-course perspectives.**
   For people whose last educational record was in 2007-08, we currently (2026) see up to 18 years of wages. The restriction limits research in several ways:
   - Researchers can only observe ***short term effects*** of educational programs on wages. This means that we are unable to see if programs have longer term effects on wages.
   - Researchers currently only observe ***early career wages***. This essentially limits outcome measurement timing to young adulthood. Researchers are unable to see what happens to people's wages as they progress through mid- and late-career.

The restriction limits researchers' ability to provide research to inform policy implications about educational effects into peak earning potential, which may not be reached until 35 years after high school.

2. **The restriction introduces bias by disproportionately removing wage data for individuals who follow non-traditional or delayed educational pathways.**
   Policymakers would benefit from the ability to be informed by consistent long-term comparisons across groups. For instance, consider following the 2008 high school graduating cohort of students into college and the workforce to assess how college enrollment and degree attainment influence wages. This would involve comparing those who go on to college with those who do not and instead enter the labor market with only a high school diploma.

   However, the structure of the data with the current legislative restriction complicates such comparisons. For individuals who enroll in college, the observation window effectively resets, allowing their wage outcomes to be tracked for an additional 20 years after college. In contrast, for those who do not enroll in college, wage data are only available for 20 years following high school graduation. As a result, while we can observe wages in 2032 for students who graduate from college in 2012, we cannot observe wages in 2032 for those who did not attend college—their data end in 2028.

This misalignment creates a critical limitation: **without comparable long-term wage data for the students who did not attend college, it becomes difficult to estimate the impact of college degree attainment on wages 20 years after college.**

	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32
HS ONLY	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓				
COLL	✓	ENROLLED IN COLLEGE				✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

✓ = MLDS is permitted to retain wage records

Appendix C: Feedback on Proposed Data Linking Limit Survey

Linking Limit

To MLDS Center Research PIs,

Maryland Education Article § 24-702(c) states: "The linkage of student data and workforce data for the purposes of the Maryland Longitudinal Data System shall be limited to no longer than 20 years from the date of latest attendance in any educational institution in the State."

The purpose of this survey is to compile justification and evidence from MLDS researchers to support the MLDS Center in advocating for legislation to remove this de-linking requirement. We are hoping to collect specific examples that demonstrate the limitations and drawbacks that this requirement imposes.

For example, high school graduates in 2008 with no subsequent education record in Maryland can currently be linked to quarterly wage data through 2027 but starting in 2028 no further workforce records could be linked to them because of the 20-year limit. It is possible that further education records after that 20-year span would not be allowed to be linked either.

MLDS Center staff have compiled some data to describe the extent of this issue. There are 359,329 individuals with an education record in the 2007-2008 academic year (from both MSDE and MHEC). Of them, 178,314 (49.6%) have no further education record and would need to be de-linked under current law.

We are requesting that you complete this survey so that we can document the challenges posed by the current delinking requirement. We appreciate your participation. **Please complete the survey by Monday, March 23, 2026**.

If you have any questions, please contact Angie at angela.henneberger@maryland.gov.

1. Name

____

2. E-mail address

____

3. On a scale of 1 to 10, how problematic is the 20-year limit on linkage of educational and workforce data as described above?

Mark only one oval.

	1	2	3	4	5	6	7	8	9	10	
Not	◯	◯	◯	◯	◯	◯	◯	◯	◯	◯	Extremely problematic

4. How would a 20-year limit on data linkage harm your research with MLDS data?

____
____
____
____
____

5. How would your MLDS research benefit from the use of data linkage beyond 20 years? This could include work you have already completed, are in the process of completing, or plan to propose.

____
____
____
____
____

6. Please share some of your experiences with other state longitudinal data systems or other longitudinal data that provide data linked across more than 20 years. What benefits have they provided for research or other purposes?

____

____

____

____

____

7. Please tell us about some examples of other research that supports the need for linking records beyond a 20-year time span. (Full detailed citations are encouraged.)

____

____

____

____

____

8. Do you have any additional comments or suggestions regarding the 20-year linking limit?

____

____

____

____

____

9. Can Angie reach out to you with additional questions if necessary?

Mark only one oval.

- ⬭ Yes
- ⬭ No

Appendix D - Mandatory Reports

MSAR #	Report Name/Citation	Staff Recommendation	RPB Recommendation	Notes
8247	MLDS Center Annual Report	Keep		The report is an opportunity for the Center to annually catalogue and present its accomplishments to the General Assembly and other stakeholders. It provides an ongoing history of the work and development of the MLDS.
11685	Career Preparation Expansion Act Report - (Ed. Art.§ 21-206) Reports on the workforce outcomes of high school students five years after graduation.	Remove (No sunset date)		The report has been annually submitted since 2018. While the reports contain important insights, that information is already provided through other Center dashboards and data tables, making this report duplicative. Creating the report with detailed explanation of the tables and findings is time consuming and there is no evidence that the General Assembly is utilizing the report for policy decisions. Further an annual report is not necessary because the year-over-year trends are repeated.
13172	Progress in the Preparation and Diversity of Teacher Candidates (Ed. Art. § 5-413)	Remove (Sunsets 2031)		The report has 20 questions that require a response. The majority of the questions are actually information provided by MSDE or MHEC and do not require MLDS data. The few questions that actually require MLDS data can be better addressed through dashboards that can be updated annually. Additionally, the Maryland State Department of Education, the Maryland Higher Education Commission, and the Accountability Implementation Board each has its own set of dashboards, providing similar information, making this report duplicative and potentially creating confusion when similar but different metrics are reported. Rather that replicate work produced by other agencies, the Center should develop dashboards and reports other agencies cannot produce. MSDE: Maryland Educator Workforce Dashboard MHEC:Educator Preparation AIB: Pillar 2: High Quality and Diverse Teachers and Leaders Additionally, a more robust reporting tool has been developed by MLDSC, Maryland College Labor Sector and Wage Explorer: Educator Preparation Programs (MD-TCLaWE).
14625	FAFSA Report - (Ed. Art. § 7-212(c)(1))	Remove (Sunsets 2028)		The report requires MLDSC to provide the number of students who completed and submitted the FAFSA in the immediate school year, the number who did not complete and the number who completed the FAFSA by the deadline for eligibility for State financial aid. This report is set to sunset in 2028 and a similar version of this report is already available on the Federal website and provides real-time data on submission rates. The MLDSC does not have access to real-time data, thus the Federal website is a more contemporaneous source of FAFSA submission rates. If not eliminated, this report would be generated two more times.
14530	Foster Care Recipients and Homeless Youth (Ed. Art. § 24-703.1(c))	Remove		Keep the dashboard and remove the reporting requirement - The report requires the MLDSC to report on the experience of foster care recipients and homeless youth including their rate of enrollment in higher education, type of higher education institution, type of financial support received, and higher education graduation rate. Keep the dashboard requirement 24-703.1(c)(1)-(3), but remove the requirement to report the Governor and General Assembly §24-703.1(c)(4). This is consistent with the dual enrollment reporting requirement 24-703.1(b).
17010	State Government - Redisclosure of Personal Records and Sensitive Data (State Gov't Art. § 10-1702(c))	Keep		On or before July 1, 2026, each governmental entity shall, in accordance with § 2–1257 of this article, submit to the General Assembly a copy of the procedures developed under subsection (b) of this section. This is a one time report and can be removed from this tracking list after this year.

8450	Data Security and Safeguarding Plan - 2010 Ch 190	Remove		In Section 2 of Chapter 190, Laws of 2010, MLDS Governing Board was required to report to the Governor on the proposed data inventory, FERPA compliance, and the development of the Data Security and Safeguarding Plan. That report was completed and filed by the Governing Board prior to the establishment of the MLDS Center. This was a one time reporting requirement and can be removed from this tracking list.
17192	30 Day Report - 3rd party agreement with data center (Ed. Art. § 24-703.1(e))	Keep		After signing a written data sharing agreement with a 3rd party data center, the MLDSC shall report on the name of the 3rd party data center, a summary of the data to be shared and the purpose and value to the State for entering into the agreement.
17193	Annual Report - 3rd party agreement with data center (Ed. Art. § 24-703.1(e))	Keep		One year after signing a written data sharing agreement with a 3rd party data center, and annually thereafter, the MLDSC shall report on the status of the data sharing agreement, how the data is being used to further the purposes and stated value of the data sharing agreement, and any violations of the data sharing agreement.