MLDS CENTER
Maryland Longitudinal Data System

Better Data • Informed Choices • Improved Results

March 8, 2024	Project Approval and Management
Version 2	Procedures

Part 1. Introduction

1.1 Purpose

The purpose of the *Project Approval and Management Procedures* is to ensure that:
1. Projects that seek to use the MLDS provide information and analyses that conform to the requirements of Maryland law[1] and the Research Agenda[2] established by the MLDS Governing Board; and
2. Projects are subject to a fair and consistent process of review that includes stakeholder input and feedback to ensure projects:
   a. Squarely address the needs of Maryland policymakers and practitioners;
   b. Necessitate the use of MLDS cross-sector data; and
   c. Are being proposed by qualified individuals.

1.2 Applicability

These procedures are required for all projects that seek to use MLDS data, including projects proposed by staff of the MLDS Center, members of the MLDS Center Research Branch, and researchers or analysts who are not affiliated with the MLDS Center.

1.3 Definitions

1. "Cross-sector" means two or more sectors as established in the [MLDS Research Agenda](https://mldscenter.maryland.gov/ResearchAgenda.html)[3].
2. "Confidential Information" means:
   a. Any information about the data system, including the data dictionary and any documentation with information about database design or schematics that are proprietary or if disclosed could compromise system security; and
   b. Any data that contains personally identifiable information, de-identified individual records, or aggregate information that may be identifiable based on the size or uniqueness of the population or could foreseeably be combined with other publicly available information to reveal identifiable information.
3. "Data System" means all hardware and software that constitutes the MLDS, including virtual machines and other components.
4. "De-identified individual records" means individual student or worker records that have been stripped of personally identifiable information. This includes all records in the MLDS operational data store and all individual records in analytic data files created from the operational data store.

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[1] Education Article § 24-703(f)(5)-(8) enumerates areas of research for the MLDS Center to conduct. See Appendix A.
[2] Education Article § 24-704(g)(5) requires the MLDS Governing Board to establish a Research Agenda to guide the work of the MLDS Center. The Research Agenda is available online. See FN #3.
[3] https://mldscenter.maryland.gov/ResearchAgenda.html

5. "Executive Director" means the Executive Director of the MLDS Center, or the Executive Director's designee.
6. "Personally identifiable information" includes an individual's name, Social Security number, driver's license number, state identification number, or other individual identification number such as a passport number, an Individual Taxpayer ID, or a financial or other account number.
7. "Principal Investigator" means the individual who will serve as the project lead on an MLDS project.
8. "Project Team" means the principal investigator and other researchers who will access and use the data system (including view only access).
9. "Research Branch" means the MLDS Center Research Branch established pursuant to the Memorandum of Understanding between the MLDS Center and the University of Maryland, Baltimore.
10. "Research and Policy Advisory Board (RPB)" means the Executive Director's advisory Board established to ensure ongoing input and participation from key stakeholders in the MLDS Center's research and policy agenda, related output and general operations. The RPB Charter and membership is available [here](#).[4]
11. "Unit-record data" refers to any information collected and maintained in the MLDS on individual students or workers.

1.4 Exception - Data Requests

1. These procedures do not apply to a data request fulfilled by Center staff as required under COMAR 14.36.04.01 et seq.
2. A data request is any request from the public for a basic aggregate data table (i.e. a clearly defined cohort and a defined outcome).
3. A data request will be deemed a project if:
   a. It requires advanced statistical analysis;
   b. It requires development of complex constructed variables; or
   c. At the request of the person making the data request, the project is being done by a non-MLDS reporting staff member.
4. Determination - The Executive Director, in consultation with legal counsel, will make the final determination of whether a data request is a project subject to these procedures or a data request.

Part 2. Application

The Principal Investigator (PI) for the project must submit the online application and upload:
1. The completed *Detailed Project Information Form*[5]; and
2. A curriculum vitae or resume for each member of the project team.

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[4] https://mldscenter.maryland.gov/egov/Publications/RPBCharter_RevisedProposal.pdf
[5] The form can be downloaded - see item #3
https://mldscenter.maryland.gov/ProjectApprovalandManagementProcedures.html

Part 3. Review and Approval Process

3.1 Project Review Process

1. Process Generally
   a. The Executive Director shall make a determination to accept or reject a project after review and advice from:
      i. The Research Director or the Reporting Director;
      ii. The MLDS Center's internal review group; and
      iii. The Research and Policy Advisory Board (RPB).
   b. The review by the Center's internal review group shall include:
      i. A review of the project application using the [MLDSC Internal Review Form](https://mldscenter.maryland.gov/egov/Publications/ExternalResearch/InternalReviewForm.pdf);[6]
      ii. A review of the credentials of the applicants; and
      iii. If requested by a member of the Center's internal review group, a meeting with the project applicants to address questions or issues.
   c. Review by the RPB shall include:
      i. A review of the project application; and
      ii. A presentation by the PI in a format established by Center staff.
   d. At any step in the review process, the project team may elect to amend their proposal and resubmit the proposal for an additional round of review at that step in the process.
2. Exceptions
   a. The Executive Director shall refer a project to the Governing Board for approval if the project:
      i. Involves research or reporting on a unique or novel topic or that uses an approach or method that is dissimilar to other research or output using Center data;
      ii. Addresses a sensitive topic or plans to analyze and report on data in a way that may be contrary to the manner in which stakeholders generally report and analyze such data; or
      iii. Receives a level of concern or objection from RPB members, that the Executive Director determines Governing Board review and approval is required.
   b. When necessary due to time constraints, the Executive Director may approve a project without RPB review if the project is necessary for:
      i. A legislatively mandated report;
      ii. A request by the General Assembly or Governor; or
      iii. A mandatory reporting requirement by a state or local agency to support a state or federal reporting requirement.
   c. The Executive Director shall provide notice to:

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[6] https://mldscenter.maryland.gov/egov/Publications/ExternalResearch/InternalReviewForm.pdf

       i.   The RPB of any project approved pursuant paragraph b of this subsection; and

     ii.   The Governing Board of all approved projects.

3.2 Timeline

1. The Executive Director shall publish on the MLDS Center website a [schedule](#)[7] for submission and review of *Project Applications*.
2. The following factors may increase the amount of time that it takes to review a project application:
    a. The Research Director, in the case of a research project, or the Reporting Director, in the case of a reporting project, think additional information and work needs to be done to the application; or
    b. The Executive Director determines that, due to the Center's workload, other priorities, or the number of other project applications received, more time is needed.
3. Provide Time for Review and Comment
    a. Project applicants are encouraged to submit project applications early and build in time to consult with the Research Director or Reporting Director, who will evaluate the project proposal, identify issues, understand data limitations, and work with the applicant to shape the project proposal to ensure a favorable review and outcome.
    b. State agencies are encouraged to notify the Executive Director before issuing a request for proposals (RFP) from third parties to conduct a project that requires the use of MLDS data.

3.3 Conditional Support

While a project is proceeding through the approval process, the Executive Director may provide a conditional letter of support for a grant application, provided that the letter clearly states that final approval is pending the completion of the required review and approval process.

3.4 Review Considerations

1. Generally project review will determine whether the project:
    a. Includes all the required information in the application;
    b. Is cross-sector;
    c. Aligns to the Research Agenda;
    d. Relates to the audit or evaluation of a state or federal education program;
    e. Provides timely and accurate information about student performance that can be used to improve the State's education system and guide policy makers;
    f. Contains clear, concise research questions or hypothesis;

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[7]

https://mldscenter.maryland.gov/egov/Publications/ExternalResearch/2024ProjectApprovalReviewSchedule.pdf

g. Applies appropriate analysis and methodologies;
h. Seeks to use data that aligns with the research questions and are loaded and available for use;
i. Presents a unique topic that does not duplicate research already completed or underway;
j. Includes appropriate Center output;
k. Sufficiently describes the further development of the Center output;
l. Provides an appropriate timeline; and
m. Provides a benefit to the State of Maryland.

2. Additional Considerations Review. When applicable, the following additional review criteria will be considered:
    a. For projects proposed by a project team that is not from a Maryland college or university or is from a private research company, the additional review will include:
        i. A determination that the project team is familiar with Maryland and is conducting a project that meets a specific Maryland research need; and
        ii. Consideration of any letter of reference or endorsement from a Maryland researcher or MLDS stakeholder vouching for the researcher's qualifications.
    b. For projects that are receiving funding, the additional review will include:
        i. The source of the funding;
        ii. Whether the funder is on the approved funders list (see Appendix B); and
        iii. If not on the approved funders list, whether the funder could in any way compromise the objectivity and rigor of the research or analysis being proposed.

Part 4. Approved Projects

4.1.Overview

1. Upon approval of the project, the principal investigator will be responsible for fulfilling the following requirements:
    a. Establish and submit a project timeline;
    b. Ensure that the principal investigator and all project team members who need access to the MLDS have submitted a *Staff Authorization and Access Form*;
    c. For research[8] projects:
        i. Comply with the Institutional Review Board requirements as specified in section 4.7 below; and

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[8] Research has the meaning established in 45CFR46.102(d), "a systematic investigation, including development, testing, and evaluation, designed to develop or contribute to generalizable knowledge."

   ii. Ensure that all project team members have completed the relevant *Collaborative Institutional Training Initiative (CITI) Training*[9] and submitted documentation of course completion.
  d. Finalize and sign off on agreed reimbursement amount or request a waiver;
  e. Review and complete the *Restricted Use Data Agreement*;
  f. Schedule and complete the mandatory new researcher/analyst training; and
  g. Submit quarterly reports as specified in Section 4.8.
2. The MLDS Executive Associate will notify the principal investigator of the requirements and will receive and track the progress with completing the required items.

4.2 Project Timeline

In consultation with Center staff, the principal investigator will complete and submit a project timeline that includes the project start date, milestones, and completion. The timeline will take into consideration:
1. When required data will be available for the project; and
2. Whether the project will require the Center to develop analytic data sets and when resources will be available to do so.

4.3 System Access

1. The principal investigator must complete the *Staff Authorization and Access Form.*
2. Other members of the project team should complete the form if they require access[10] to the MLDS.
3. The Staff Authorization and Access Form will be sent to the principal investigator by the MLDS Executive Associate.

4.4 Restricted Use Data Agreement

1. A restricted use data agreement (RUDA) must be executed for each research project being conducted by a researcher or analyst, unless the researcher or analyst is employed by and conducting research for a Maryland State agency.
2. The agreement must be signed by:
   a. An official at the principal investigator's organization with the authority to bind the organization to the agreement; and
   b. If the project team is affiliated with multiple organizations an official at each affiliated organization with authority to bind the organization to the agreement.

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[9] If researchers have already completed CITI training, they can submit the training certificate for the modules they have already completed. If researchers need to start a new training, we recommend the module: *Ethical and Appropriate Uses of Administrative Data for Research and Evaluation*.

[10] For example, they require access to unit-record data for analysis or access to unsuppressed statistical output.

4.5 Reimbursement

1. Except as provided in subsection 2, projects shall reimburse the Center for the following costs when incurred by the Center in the administration and support of the project:
    a. Security background checks;
    b. System access, monitoring, data storage, and security;
    c. Compiling a data set for research;
    d. Support from subject matter experts;
    e. Support from Research Branch staff;
    f. Security Monitoring;
    g. Review of materials, including suppression review; and
    h. Technical assistance.
2. Waiver.
    a. A principal investigator may submit a request to the Executive Director to have reimbursement of costs waived or set at a reduced amount.
    b. The Executive Director will review the request and make a determination.
3. Externally Funded Projects.
    a. Externally funded projects should plan to provide funding for reimbursement for the MLDS Center's efforts on the project.
    b. The MLDS Center does not typically accept waivers for projects that are externally funded.

4.6 Training

The project team must complete the MLDS Center training session outlining the MLDS data system, its acceptable use, and the MLDS Center guidelines for suppression requirements.

4.7 Institutional Review Board

1. All project teams must provide the MLDS Center with an approval from their Institution's Institutional Review Board (IRB) or a justification why IRB approval is not required.
2. Approval may include a Non-Human Subjects Research exemption waiver.

4.8 Progress Reports

The principal investigator shall submit quarterly progress reports (see Appendix C) on:

1. Work completed and whether the project is on schedule;
2. Changes to project personnel; and
3. Whether, during the next quarter:
    a. The project team wants to meet with MLDS stakeholders to review findings or ask questions; or
    b. Any data tables will need to be reviewed for suppression compliance.

4.9 Software

1. The MLDS Center provides each researcher with a virtual machine with SAS Studio.
2. The principal investigator may request that the MLDS Center IT Team load other software programs on the virtual machine needed for the project. The principal investigator is responsible for the software license and any costs associated with the software that will be needed in support of the work on the project.

4.10 Data Usage

1. The project team may only use MLDS data for the project as specified in the project application. Access to and use of MLDS data is granted for a fixed amount of time and may be renewed if needed at the discretion of the Executive Director.
2. The Executive Director will immediately terminate access in cases where there is significant risk of unauthorized disclosure of confidential information, violation of security guidelines, or use of data in a manner that is not consistent with project application.

4.11 Project Changes

1. Changes to the approved project plan require approval from the Executive Director . Changes include:
    a. Changes to or the inclusion of additional research questions;
    b. Changes to the proposed methodology;
    c. Changes to the data sets requested for the project; or
    d. Changes to the project funding.
2. Change requests can be filed on the quarterly project report (see Appendix C).
3. After reviewing the change, the Executive Director will:
    a. Approve the change upon determining that the requested change is minor in scope and does not significantly alter the purpose or nature of the project that was originally submitted and reviewed; or
    b. Deny the change upon determining that the change is substantial in scope and materially changes the purpose and nature of the project beyond what was originally reviewed.
4. If the change is denied, the principal investigator may either continue pursuant to the original project application or submit a new application for approval.

4.12 Release of Research or Reporting Products

1. Suppression
    a. The principal investigator and members of the project team are responsible for compliance with MLDS Center Suppression Guidelines.[11] MLDS Center Staff will review, but not do the suppression work.

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[11] https://mldscenter.maryland.gov/DataSuppressionRules.html

b. The MLDS Center recognizes that there are several techniques used to avoid the disclosure of personally identifiable information. Moreover, there may be a unique situation in which the Guidelines fail to meet the needs of the project and/or FERPA or UI compliance. In such a situation, where the Guidelines are inadequate, the Center may require the principal investigator to take additional precautions through the application of additional masking techniques. The Center will work with the principal investigator to find the best possible solution to meet both the project needs and disclosure avoidance.

2. Release of Research and Reporting Products
    a. The project team is prohibited from removing any materials from the data system.
    b. When the project team is ready to remove materials from the data system, the principal investigator shall make a request to the Executive Director, using the online [suppression review request form](#).[12]
    c. Review Outcome
        i. The Executive Director will only authorize release of materials upon a determination that:
            ● Confidential information is not disclosed; and
            ● The product is consistent with the project application.
        ii. If release is not authorized because of a determination that confidential information is being exposed, the project team will be directed to fully address the issue and resubmit for review.
        iii. If release is not authorized because the work is inconsistent with the project application:
            ● The principal investigator will be directed to make necessary modifications to the project to conform it to the original project application; or
            ● If the product is substantially different from the original project application, the project will be terminated and the principal investigator will be denied further system access.

4.13 Center Product and Further Development

1. Center Product
    a. All projects must include a Center product. The Center product ensures that the project provides value to the State and allows for the consistent dissemination of the project findings and outcomes to MLDS stakeholders.
    b. A Center product includes:
        i. Presentations (e.g. MLDS Research Series);
        ii. Reports;
        iii. Research summaries;
        iv. Policy Briefs;
        v. Dashboards;
        vi. Data tables;

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[12] https://mldscenter.maryland.gov/ResearcherSuppressionRequest.html

        vii.   A report produced for the General Assembly, Governor, or another state agency; or

        viii.   Other content approved by the Executive Director.

c. Center products should be developed and delivered in a manner that is appropriate for the intended audience (generally state or local policymakers).

d. The Center product must be provided to the MLDS Center. Center still review the product and determine whether the product is sufficient or requires additional information. Once finalized, the Center will use and disseminate the product..

e. The Center shall provide notification to stakeholders of Center products and offer opportunities for discussion, conversation and questions about the implications and applicability of the findings.

2. Further Development

    a. The further development of a project under these procedures is subject to the Data Rights and Publication section of either:

        i.   For MLDS Research Branch projects, the interagency agreement between the University of Maryland, Baltimore and the MLDS Center; or

        ii.   For projects by an external researcher, the Restricted Use Data Agreement[13] must be entered into prior to the start of the project.

    b. Further developed work must be based on the proposed research question and may only use the analytic data set created for the project.

3. Further Developed Works

    a. As specified in subsection 4 of this section, further developed works are subject to the Data Rights and Publication section of the applicable agreement. The agreements require notification to the MLDS Center and a review period. The notification shall be provided by filling out the Notification of Further Development Form ([here](#)).[14]

    b. Except as provided in paragraph C of this subsection, further developed works must be made available to the MLDS Center in an electronic format for posting on its website.

    c. If a further developed work is copyrighted the principal investigator must provide, at no cost, a single copy to the Center and partner agencies.

    d. The principal investigator shall provide the Center with any additional dissemination plans other than those outlined in the original proposal.

    e. Further developed works must include the following:

This [research/report/analysis] was conducted using data from the Maryland Longitudinal Data System (MLDS) and with the technical support of the MLDS Center staff. The conclusions of this [research/report/analysis] do not reflect the opinion of the State of Maryland, MLDS Center, the MLDS Governing Board, or its partner agencies.

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[13] https://mldscenter.maryland.gov/ResearcherResources.html
[14] https://mldscenter.maryland.gov/ResearcherResources.html

4.14 Project Closeout

1. Access to the MLDS workstations and secure environment will be rescinded on the approved project end date or an earlier date if the project concludes before the project end date. When access is rescinded, physical access to the workstations will expire along with login permissions. All researcher folders/workspace files will be kept for a period of five years then destroyed.
2. The principal investigator should indicate that the project has been completed on the quarterly report (see Appendix C).
3. Any materials that the project team wishes to remove from the MLDS, including statistical program code or syntax, must follow suppression review procedures.
4. If a member of the project team leaves the project prior to completion, the project lead must inform the Executive Director immediately so access can be terminated.

Appendix A - MLDSC Duties

Education Article
§ 24-703
(f) The Center shall perform the following duties:

  (5)   Conduct research relating to:

      (i)   The impact of State and federal education programs;

      (ii)   The performance of educator preparation programs;

      (iii)   Best practices regarding classroom instruction, education programs and curriculum, and segment alignment; and

      (iv)   The impact child welfare programs have on the educational and economic outcomes of students;

    (6)   At the direction of the Accountability and Implementation Board established in Title 5, Subtitle 4 of this article provide:

      (i)   A researcher designated by the Board access to the data in the Maryland Longitudinal Data System in accordance with the procedures for staff authorization and data access established by the Maryland Longitudinal Data System governing board;

      (ii)   Aggregate data tables; or

      (iii)   Research or evaluation;

    (7)   Analyze social determinants from the following State agencies and appropriate local agencies that impact the education performance of students and indicate the need for wraparound services of students:

      (i)   The Maryland Department of Health;

      (ii)   The Department of Juvenile Services; and

      (iii)   The Department of Human Services;

    (8)   To the extent practicable, conduct longitudinal studies of the items under this section to evaluate the impact of the Blueprint for Maryland's Future on the State;

Appendix B - Approved Funders List

1. Federal Agencies, including:
   a. U.S. Department of Education (including NCES, IES and other divisions);
   b. National Institutes of Health;
   c. U.S. Department of Labor;
   d. Department of Justice (Office of Juvenile Justice and Delinquency Prevention);
   e. National Science Foundation;
   f. USDA; and
   g. Administration for Children and Families (U.S. Department of Health and Human Services)
2. Maryland State and Local Government, including county boards of education;
3. Maryland Public Institutions of Higher Education;
4. American Educational Research Association (AERA);
5. Spencer Foundation;
6. Russell Sage Foundation;
7. Bill & Melinda Gates Foundation;
8. William T. Grant Foundation;
9. Institute for Research On Poverty, University of Wisconsin;
10. Arnold Foundation;
11. Annie E. Casey Foundation; and
12. Abell Foundation
13. Wallace Foundation
14. Robert Wood Johnson
15. Kellogg Foundation
16. Lumina Foundation

Appendix C - Quarterly Project Progress Report

Introduction
Section 4.8 of the Project Approval and Management Procedures requires the principal investigator of an approved project to submit a quarterly progress report. Completing this form fulfills the reporting requirement and, when applicable, serves as a means to amend your project plan, project timeline, and/or project team. This form will be emailed to principal investigators of approved projects and the report will be completed using Google Forms.

Please Note
1. Parts of this report may be used to update stakeholders on project statuses.
2. If you are the principal investigator on more than one project, you must complete a separate form for each project.
3. If you have questions about this form, contact Ross Goldstein ross.goldstein@maryland.gov

Part 1 - Project Information
1. Which quarter is this report for?
    a. Quarter 1 - July through September - due 10/15
    b. Quarter 2 - October through December - due 1/15
    c. Quarter 3 - January through March - due 4/15
    d. Quarter 4 - April through June - due 7/15

2. Name of Principal Investigator *
3. ERA # (click here for list of project numbers) *
4. Project Title

Part 2 - Project Status
1. What is the status of your project?
    a. Approved, but work has not started
    b. Approved, but pending funding
    c. In-progress - work has begun. A Center Product has not been completed.
    d. Further Development. A center product has been provided and now further development work is ongoing.
    e. Complete - no further development is planned.
2. If not started - when do you anticipate starting your project?
3. What, if any assistance do you need from the MLDS Center to get started.

Part 3 - Project Updates
1. Provide a brief (200 words or less) description of the work completed during the reporting period. Note - This information will be copied and pasted into the MLDS Center

Monthly Report. Please use past tense and third person (i.e. The researchers finalized data cleaning).
2. Do you anticipate needing suppression review during the next quarter?

Part 4 - Output
1. In the past quarter, did you complete any of the following? (check all that apply)
   a. Center Product
   b. Conference Presentation (provide APA style citation below)
   c. Conference Proposal Acceptance (provide name of conference below)
   d. Journal Publication (provide APA style citation below)
   e. Grant Application not included in Project Application (provide name of funder and dollar amount below)
   f. New Grant Ward not included in Project Application (provide name of funder and dollar amount below)
   g. None of the Above
   h. Other: _____
2. For each of the boxes checked above, please provide the additional requested information.

Part 5 - Project Amendments Overview
1. You are required to report (as a project amendment) the following types of changes your project:
   a. Substantive Change - A substantive change includes: adding or changing research questions; changing the proposed methodology; changing the data requested for the project; or new or different project funding. If you aren't sure whether a change is "substantive," please include it anyway.
   b. Schedule Change - A significant change to the schedule you provided in your Project Application (i.e. more than a month).
   c. Team Member Changes
2. Do you have an amendment to report
   a. Yes
   b. No
3. Do you need to amend your *project schedule*?
   a. Yes - Please provide a revised schedule that includes: (1) when you intend to start using MLDS data; (2) time frame for analysis; (3) expected center product delivery; (4) time frame for further development; and (5) project completion and exit from system.
   b. No
4. Do you have a *substantive project change* to report? (A substantive change includes: adding or changing research questions; changing the proposed methodology; changing the data requested for the project; or new or different project funding)
   a. Yes - Please provide a detailed description of any: new or additional research questions; changes to the proposed research methodology; changes to the data requested for the project; and/or new or different project funding.

    b. No
5. Do you have a change in Research Team Members to Report?
    a. Yes
        i. Please provide the name of each research team member that is leaving the project. Please indicate whether the system access can be removed.
        ii. Please provide the name of each new researcher that will be joining the project. Please include whether the new research will require system access.
    b. No