July 2, 2020

The Honorable Larry Hogan, Governor
State House
100 State Circle
Annapolis, MD 21401

Senator Paul G. Pinsky, Chair
Senate Education, Health, and Environmental Affairs Committee
Miller Senate Office Building, 2 West
Annapolis, MD 21401

Delegate Anne R. Kaiser, Chair
House Committee on Ways and Means
House Office Building, Room 131
Annapolis, MD 2140

Re: MSAR #11654 Student Data Governance Report

Dear Governor Hogan, Senator Pinsky, and Delegate Kaiser:

Chapter 381 of 2018 requires the Maryland State Department of Education to submit to the Governor and the Maryland General Assembly on or before July 1 of 2019 and July 1, 2020, a report on the status of the implementation of the requirements of the Student Data Governance bill.

Please find enclosed the second and final report on the implementation of the Student Data Governance bill (Chapter 381). This report was made possible through the cooperation of Maryland's local school systems and the Student Data Governance Designees participation and assistance.

Should you have questions or need additional information, please contact Tiffany Clark, Director of Government Relations, at (410) 767-0090 or by email at tiffany.clark1@maryland.gov.

Best Regards,

Karen B. Salmon, Ph.D.
State Superintendent of Schools

Student Data Governance Report

to the

Senate Education, Health, and Environmental Affairs Committee

and the

House Committee on Ways and Means,

on the status of the implementation of

HB 568 - Student Data Governance

Presented by the

Maryland State Department of Education

July 1, 2020

Larry Hogan
Governor

MARYLAND STATE DEPARTMENT OF
EDUCATION
EQUITY AND **EXCELLENCE**
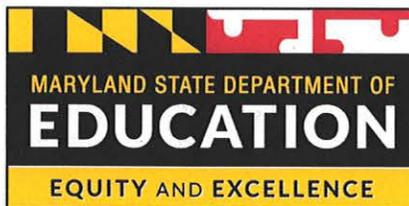
Karen B. Salmon, Ph.D.
State Superintendent of
Schools

MARYLAND STATE DEPARTMENT OF EDUCATION
200 West Baltimore Street
Baltimore, Maryland 21201
410-767-0100
MSDE.maryland.gov

Karen B. Salmon, Ph.D.
Superintendent of Schools

Brigadier General Warner I. Sumpter, (Ret.)
President, Maryland State Board of Education

Larry Hogan
Governor

Carol A. Williamson, Ed.D.
Chief Academic Officer
Teaching and Learning

Jennifer Judkins, Ed.D.
Assistant State Superintendent
Division of Assessment, Accountability, and Information Technology

Contents

Purpose and Background

During the 2018 Legislative Session, Maryland lawmakers passed the Student Data Governance bill (HB 568). This bill requires the Maryland State Department of Education (MSDE), in consultation with the Department of Information Technology (DoIT) and the county boards of education, to develop and update best practices for county boards on data governance and professional development on data governance policies and procedures. MSDE must also develop strategies to coordinate and assist local data governance staff in the counties to implement the bill's requirements. The bill took effect July 1, 2018.

The MSDE, in consultation with DoIT, and the county boards of education is required to provide guidance on best practices in three areas:
1. Data Governance,
2. Transparency, and
3. Professional Development.

The MSDE established a Student Data Governance Workgroup which created a roadmap that integrates three phases to complete the requirements of the legislation and sustain this work. Each phase includes strands of work with updates provided as part of required reporting. Phase I, during the 2018-2019 academic year, focused on planning and engagement. Phase II, during the 2019-2020 academic year, focused on the development and application of best practices. Phase III beginning in July 2020, includes continued technical assistance and sustainability to support local schools system implementation of best practices.

Reporting Requirements

The MSDE must report twice, by July 1 of 2019 and July 1, 2020, to the Senate Education, Health, and Environmental Affairs Committee and the House Committee on Ways and Means, on the status of the following related to the implementation of HB 568:
1. development and implementation of best practices in the areas of data governance, transparency, and professional development;
2. levels of engagement by county boards;
3. barriers to engagement, if any, including fiscal, statutory, or workplace obstacles; and
4. any recommended statutory changes.

This is the second and final report by the MSDE and will meet the legislative requirement to submit a report by July 1, 2020.

Status

Status on development and implementation of best practices

The MSDE convened a Student Data Governance Workgroup of local school system designees to provide expertise to the MSDE and the Department of Information Technology in developing and updating best practices for the State of Maryland. Since December 2018, the MSDE Student Data Governance Workgroup convened two in-person meetings, two virtual meetings, and conducted four needs-assessments or follow-up surveys.

The MSDE with the Student Data Governance Workgroup, created a roadmap that integrates three phases to complete the requirements of the legislation and sustain this work. Each phase included yearly strands of work that resulted in the required reporting and ensures sustainability. These interconnected strands of work require close coordination between the Workgroup, the MSDE, the Maryland Department of Information Technology, local school systems, and other relevant stakeholders. Each Workgroup meeting or survey aligned with the phases of the roadmap.

MSDE Student Data Governance Toolkit

To provide continued technical assistance and sustainability to support local schools system implementation of best practices, the MSDE is in the process of developing a Student Data Governance Toolkit. The toolkit reflects the needs of the Workgroup designees, the requirements of the Student Data Governance legislation, and best practices from across the nation. The toolkit focuses on Data Governance, Transparency, Professional Development, and Local School System Capacity. The toolkit also includes a complete glossary of terms. Each focus area will include a section on the importance of the area, a selection of best practices for local school systems, additional resources, and a case study highlighting a particular local school system, when applicable.

The Toolkit is a working document and will be updated over time to reflect the priorities of the Workgroup.

Planned Timeline for MSDE Student Data Governance Toolkit

Planned Date	Activity
October 2020	DRAFT Toolkit for review by the Student Data Governance Workgroup at next scheduled meeting
January 2021	Toolkit Release, version 1
June 2021	Identify proposed changes to toolkit at scheduled Workgroup meeting
January 2022	Toolkit Release, version 2

Status on the levels of engagement by county boards

Local school systems have been consistently engaged in this work with the MSDE. At the request of the MSDE, Baltimore, Caroline, Frederick, and Queen Anne's local school systems presented to the Workgroup at various meetings. Other local school systems, such as Baltimore City, attended Workgroup meetings with a governance team to participate in action planning and small group discussions.

At each meeting, Workgroup designees engaged in robust conversation. When the MSDE moved to virtual meetings, local school systems continued to actively participate in conversations and chat dialogue.

Student Data Governance Designees

In late 2018, during a regularly scheduled Public School Superintendents' Association of Maryland (PSSAM) meeting, the State Superintendent of Schools spoke with Maryland local school superintendents regarding the requirements of the law. In December 2018[1], the State Superintendent formally requested each local school system superintendent designate an employee to maintain a data governance program in the county (Md. Code, Ed. Art, §7-2004-(B)).

Student Data Governance Workgroup Meetings

Since December 2018, the Student Data Governance Workgroup has convened four times. Descriptions of the meetings and local school system engagement is described below.

Meeting 1: March 8, 2019

The Student Data Governance Workgroup met for the first time on March 8, 2019 for a full-day meeting. The meeting began with welcome and introductions from the designees and other staff in attendance. The Division of Assessment, Accountability and Information Technology (DAAIT) presented an overview of purpose and projected outcomes. The MSDE, with the workgroup, defined areas of focus, supports needed from the MSDE, discussed the phases to implement the legislation, and discussed options for sustainability. Technical assistance support from the Privacy Technical Assistance Center (PTAC) and the State Support Team (SST) of the Statewide Longitudinal Data Systems (SLDS) were available during the day to guide and add to conversations about best practices.

Meeting 2: November 11, 2019

The second meeting of the Student Data Governance Workgroup was held on November 11, 2019. The Division of Assessment, Accountability and Information Technology (DAAIT) reviewed the purpose of the Workgroup, the outcomes, and the timeline. Experts with the SLDS State Support Team presented on building local school system capacity through improving governance. During the first workgroup meeting, local school systems identified capacity building as an area in which additional assistance was needed. The SLDS State Support Team outlined steps local school systems may take to improve governance within a local school system. Workgroup designees then had the opportunity to work

---

[1] Memo, Local County Data Governance Designee, Maryland State Department of Education, December 14, 2018

through a District Action Plan based on the steps previously presented and with assistance from the SLDS State Support Team and the MSDE.

Meeting 3: April 20, 2020

The planned third in-person meeting was revised due to the coronavirus pandemic. The Workgroup met virtually on April 20, 2020 to focus on student data security and the role of student data governance during the coronavirus pandemic. Dale Cornelius, the Maryland State Department of Education's Chief Information Officer welcomed the workgroup and discussed the steps MSDE Office of Technology was undertaking to support this work. Mr. Cornelius introduced Edward Gardner, Frederick County Public School's Director of Technology Infrastructure. Mr. Gardner presented on Frederick County Public Schools' implementation of the State of Maryland Information Technology Security Manual and the importance of this work.

Meeting 4: May 18, 2020

The fourth meeting of the Student Data Governance workgroup took place virtually on May 18, 2020. The Division of Assessment, Accountability and Information Technology (DAAIT) reviewed the charge and purpose of the Workgroup. The Workgroup reviewed and discussed proposed recommended statutory changes suggested by the MSDE and Workgroup designees. The Workgroup also brainstormed existing barriers to the full implementation of student data governance work in their local school systems, and options for possible resolutions for those barriers. To close the meeting, the MSDE reviewed the deliverables to come out of the Workgroup and provided an update on the Maryland Student Privacy Council.

Percent of Local School System Participation by Meeting

A bar chart showing: Meeting 1: 79%, Meeting 2: 58%, Meeting 3: 71%, Meeting 4: 79%.
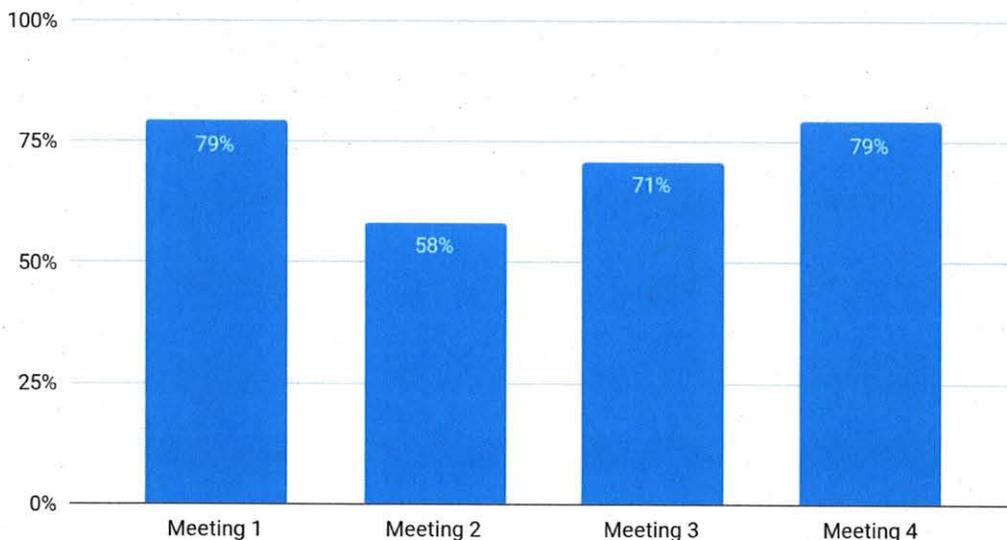
Survey Participation

The MSDE conducted four surveys since December 2018. Descriptions of each survey and local school system engagement are described below.

Survey 1: February 2019

The MSDE surveyed local school systems for baseline information on their status in meeting the requirements of the Student Data Governance (HB 0568) bill. Local school systems shared links and resources with the Workgroup through this survey.

Survey 2: April 2019

The MSDE conducted a follow-up survey after Meeting 1 to determine engagement, value, and next steps for the Workgroup.

Survey 3: October 2019

The MSDE surveyed Workgroup members to determine the needed areas of focus for the Workgroup activities through the year.

Survey 4: May 2020

The MSDE surveyed Workgroup members to gather information for the final report including agreement with proposed recommendations, other recommendations for consideration, resources for professional development, and local school system barriers.

Percent of Local School System Participation by Survey

Bar chart showing: Survey 1: 83%, Survey 2: 54%, Survey 3: 58%, Survey 4: 54%
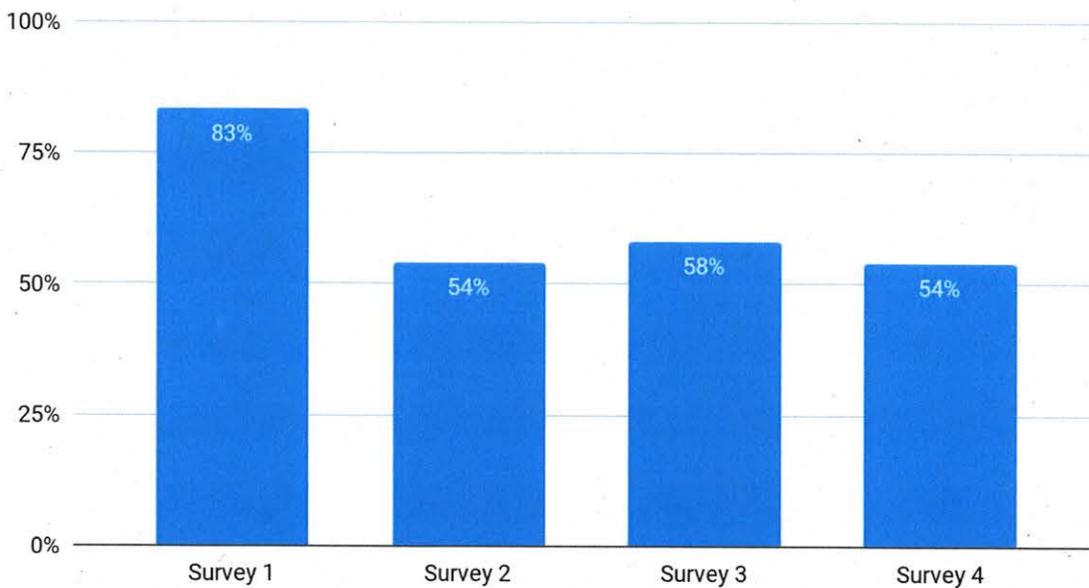
Status on barriers to engagement

The Student Data Governance Workgroup identified a number of barriers at both the state and local levels.

Local School System Fiscal Barriers

The *2018 Regular Session - Fiscal and Policy Note for House Bill 568*[2] indicates that the legislation "does not require local school boards to implement any best practices developed by MSDE (in consultation with DoIT and local school boards), jurisdictions that choose to implement the recommendations may realize significant costs."

The Workgroup identified three areas in which fiscal barriers impede this work in the local school systems. Each of these areas are described below. The Workgroup will continue to discuss possible solutions to these barriers especially in these challenging times.

1. *Risk to student data*

Local school systems increasingly rely on technology to support learning, instruction, and student engagement with increasing threats to the confidentiality, availability, and integrity of their data systems and technology. The FBI notes "The US school systems' rapid growth of education technologies and widespread collection of student data could have privacy and safety implications if compromised or exploited."[3] Such threats have fiscal and non-fiscal consequences.

Fiscal Consequences

An IBM Security/Ponemon Institute report[4] "shows that the average cost of a data breach is $141 per record, but in education it typically reaches $200 per record". The fiscal consequences for compromised or exploited student data cover four cost areas:

1. Detection and escalation
2. Notification Costs
3. Post data breach response, and
4. Lost business cost.

Non-fiscal Consequences

Both experts and Workgroup members noted the non-fiscal consequences for compromised or exploited student data including the breach of trust and confidence with students, families, and other stakeholders.

---

[2] "Fiscal and Policy Note (Revised)" 2018 Regular Session, House Bill 0568, *Maryland General Assembly*,, retrieved June 2020
[3] Department of Justice, Federal Bureau of Investigation. "Education Technologies: Data Collection and Unsecured Systems Could Pose Risks to Students." *Public Service Announcement*, Alert Number I-091318-PSA, 13 Sept. 2018.
[4] Ponemon Institute. "Cost of a Data Breach Study." IBM Security, 2019.

2. *Dedicated data governance staff positions*

As the Data Quality Campaign explains, "safeguarding student data is not just a technical project done by one person...It must be an integral part of the...purposeful, planned, and transparent efforts to use data in support of student learning." Dedicated and knowledgeable staff to lead and support a "culture of valuing data, clearly communicating about data, and understanding and practicing ethical data use" is an important component of effective student data governance.[5]

"We also need support for appropriate staffing to support this effort."

- Student Data Governance Workgroup participant

Few Maryland local school systems have dedicated staff positions necessary to manage and maintain a data governance program. Workgroup participants noted the major barrier to creating staff positions are the salary requirements and hiring costs. Workgroup members stressed the importance of dedicated staff for these positions cautioning that when such duties are assigned to existing staff other priorities are shifted, or the data governance duties are not given full attention. Staff positions may include a Data Governance Coordinator, Student Data Privacy Officer, and a Chief Information Security Officer (CISO).

Key data governance positions with descriptions and salary requirements are included in the table below.

---

[5] Horne, Carmen. "Roadmap to Safeguarding Student Data." *Data Quality Campaign*, 27 Nov. 2018.

Identified Data Governance Positions with Descriptions and Salary Requirements

Role	Description	Estimated Annual Salary Requirements
Data Governance Coordinator	The Data Governance (DG) Coordinator is responsible for leading the overall direction and implementation of the data governance program. As part of the implementation, the DG Coordinator manages the establishment, monitoring, improvement, documentation, and training for the data governance program, as well as for data policies and processes.[6]	$85,000[7] to $166,549.80[8] annually depending on experience, size of the organization, job classification, and geographic location
Chief Privacy Officer	A chief privacy officer is a senior leader who is responsible for managing an organization's privacy responsibilities and compliance with legal requirements. Responsibilities include creating and enforcing organizational privacy policies that govern an organization's data collection, sharing, and use.[9]	$123,789 to $162,993[10] annually depending on experience, credentials, size of the organization, job classification, and geographic location
Chief Information Security Officer	The Chief Information Security Officer (CISO) is a senior leader responsible for developing, maintaining and overseeing the system's Information Technology Security Program. Responsibilities include assessing system vulnerabilities for security risks and implementing risk mitigation strategies. The CISO is responsible to ensure security controls are in place that will safeguard digital files and vital electronic infrastructure.[11]	$130,759[12] to $338,881[13] annually depending on experience, credentials, size of the organization, industry bonuses, and geographic location

[6] SLDS Grant Program. "SLDS Guide: Single Agency Data Governance: Roles and Responsibilities." *Institute of Education Sciences (IES) SLDS Grant Program*, Dec. 2019.

[7] "Director of Data Governance." *Washington State Office of Superintendent of Public Instruction.*

[8] "Director III - K-12 Data Governance at Santa Clara County Office of Education." *EdJoin*, Accessed 16 June 2020.

[9] Laird, Elizabeth, "Chief Privacy Officers: Who Are They and Why Education Leaders Need Them." *Center for Democracy & Technology*, January 2019.

[10] "Chief Privacy Officer Salary in Maryland." *Salary.com*, Accessed 16 June 2020.

[11] "State of Maryland Information Security Manual." Version 1.2. *Maryland Department of Information Technology*, June 28, 2019.

[12] "Chief Information Officer Salaries in Maryland." *Indeed.com*. Accessed 16 June 2020.

[13] "Metrics and ROI That Matters in 2020 and Beyond." *Security Magazine*, 22 January 2020.

3. Security and privacy services

At the Workgroup's third meeting, Edward Gardner, Frederick County Public Schools' Director of Technology Infrastructure presented information on the State of Maryland Information Technology Security Manual and Frederick County Public Schools' recent audit under the Maryland Office of Legislative Audits. Mr. Gardner reviewed the requirements under the State of Maryland Information Technology Security Manual which requires a number of policies, procedures, and services.

The Workgroup noted the time and resources necessary to create effective policies and procedures and the cost in acquiring appropriate services.

> *"This is about changing the culture...around data, and this culture change starts from the top."*
>
> *- Data Quality Campaign, Safeguarding Data*

Local School System Workplace Barriers

Workgroup participants identified other barriers within their local school systems that impede this work. Each of these barriers is described below.

1. Barriers to building a culture of privacy

Workgroup members emphasized the need for buy-in throughout the system to ensure a culture of privacy. During the Workgroup's first meeting, the State Support Team highlighted the role executive level leadership plays in implementing a data governance program. Workgroup members also discussed how prioritization from leadership ensures that other offices within the system not only accept data governance programs, but also embrace them.

While the majority of attendees at the Workgroup meetings were representatives from information technology, they recognized the lack of interoffice cooperation as a persistent barrier.

2. Competing priorities

The Workgroup members acknowledged that the COVID-19 pandemic deterred or identified weaknesses for many local school systems' data governance plans or programs. Workgroup members emphasized the importance of incorporating data governance when there are competing priorities. As one Workgroup member noted:

> "The pandemic. We were meeting bi-weekly to work on and finalize certain formal documents... many in our group have had to shift responsibilities."

> *"COVID-19 has exposed the weaknesses"*
>
> *- Student Data Governance Workgroup participant*

3. Professional development challenges

The U.S. Department of Education's Privacy Technical Assistance Center (PTAC) identifies expanding and enhancing security training for all data users as the "best strategy for ensuring that a major threat to data security in education organizations—uninformed users—is proactively addressed."[14]

A barrier for our system is the ability to train and build understanding of all staff on best practices for keeping student data safe.

- Student Data Governance Workgroup participant

The primary barrier for Workgroup participants is the lack of available training materials. Even those systems who contract for SafeSchools online safety programs, noted that student data privacy is not an available module within the program. Workgroup participants also identified prioritizing the time for training as a persistent barrier.

The MSDE Fiscal Barriers

1. Risk to student data

Like local school systems, the Maryland State Department of Education also faces risks to compromised or exploited student data. The fiscal and non-fiscal consequences are similar for the MSDE as for local school systems, on a larger scale as the MSDE maintains student data for all Maryland local school systems.

2. Dedicated data governance staff positions

As noted above, dedicated and knowledgeable staff to lead and support a data governance program are an important component of effective student data governance.

Like the local school systems, the MSDE does not have dedicated staff positions necessary to manage and maintain a data governance program. Additionally, without dedicated staff the MSDE cannot provide support to local school systems. Staff positions may include a Data Governance Coordinator, Student Data Privacy Officer, and a Chief Information Security Officer (CISO). Salary requirements for these staff positions at the state level are comparable to the requirements presented for local school systems.

3. Lack of resources to local school systems

Federal grant funding or state funding supports many programs within the local school systems. For these programs, the MSDE administers and distributes the grant funding. There are no regular funding sources for this work to support the local school systems.

---

[14] Privacy and Technical Assistance Center, "Data Security and Management Training: Best Practice Considerations", *U.S. Department of Education*, December 2011 (revised June 2015),.

The MSDE Workplace Barriers

1. *Lack of clear guidance and support from Maryland Department of Information Technology (DoIT)*

The Workgroup noted that it is not clear what responsibilities local school systems have regarding the Maryland Information Security Manual. Additionally, many local school systems noted they have been subject to compliance audits by the Maryland Office of Legislative Audits which has held the local school system to requirements in the Maryland Information Technology Security Manual.

> "We are in great need of an 'Authoritative Source' that provides model policies and procedures as well as processes. We...get resistance from local staff on the need and importance of having detailed documentation on Data Governance."
>
> -Student Data Governance Workgroup participant

Local school systems are considered a unit of state government under Md. Ann. Code, State Government Art., §§10–1301-1306, and must comply with statutory requirements regarding the protection and destruction of personally identifiable data, and responsibilities in the event of a data breach. In June 2019, the Maryland Department of Information Technology (DoIT) released the State of Maryland Information Technology Security Manual (Version 1.2) which includes a minimum level of security requirements.

Local school systems, and the MSDE need clearer guidance on the relationship between the Maryland Information Technology Security Manual, statutory requirements, and audit compliance.

2. *Lack of a clear point of contact at the MSDE to coordinate support to local school systems*

The MSDE does not have a data governance office, nor have data governance tasks been clearly assigned to a particular office or person at the MSDE. Workgroup members noted that the lack of an authoritative source at the MSDE means that local school systems have no resource at the state level to provide technical assistance, ensure compliance, or disseminate information and resources. Many Workgroup members noted that an initial challenge in their local school systems was identifying the appropriate office to lead data governance work.

3. *Lack of consolidated legal counsel for local school systems*

Workgroup members noted that there are a number of state and federal laws that govern and protect student data. The Workgroup noted that local school system legal counsel may have limited knowledge or experience nuances of both state and federal law. The Workgroup agreed that a consolidated source for legal counsel in student data matters would benefit local school systems and ensure equity across the state.

Recommended statutory changes

The Workgroup with the MSDE identified three recommendations.

Recommendation 1

The Department should extend the Student Data Governance Workgroup beyond June 2020.

The designees agreed that the Workgroup should continue to meet through the 2020-2021 school year, and then re-evaluate the need to continue. Designees expressed the need for a collaborative space where local school systems can dialogue with each other and the MSDE on a regular basis.

Recommendation 2

Require each county board to designate an employee to manage and maintain a data governance program in the county.

Under Md. Ann. Code, Ed. Art., §7–210, a county board may designate an employee to manage and maintain a data governance program in the county. The MSDE recommends changing the "may" to "shall".

The MSDE has had success in the identification of designated positions within local school systems to ensure a direct point of contact to collaborate, assist in the dissemination of information, and assist in accountability.

Recommendation 3

The Maryland State Department of Education shall adopt regulations to implement the requirements of the Student Data Governance Act as required under Md. Ann. Code, Ed. Art., §7–2105.

The Workgroup supports the adoption of regulations to clarify the expectations for local school systems.

Appendix

Phases and Strands

The MSDE with the Student Data Governance Workgroup, created a roadmap that integrates three phases to complete the requirements of the legislation (HB 568, RS 2018) and sustain this work. Each phase includes strands of work that will take approximately one year to complete and will result in the required reporting and ensure sustainability. These interconnected strands of work requires close coordination between the Workgroup, the MSDE, the Maryland Department of Information Technology, local school systems, county boards of education, and other relevant stakeholders.

Phase I: Planning and Engagement

Year 1 (July 2018 - June 2019)

Engagement	Study	Develop	Report
☑ Identify data governance designees in each LSS	☑ Needs assessment questionnaire	☑ Begin to prioritize needs	☑ Report on the status of Phase I
☑ Develop purpose and outcomes	☑ Small group action planning	☑ Identify needed tools for local school systems	☑ Recommendations for Phase II
☑ Convene workgroup	☑ Determine barriers	☑ Identify additional partners with resources and supports	
☑ Identify available resources and supports	☑ Gather relevant resources from LSS		
☑ Build capacity and institutional knowledge	☑ Follow-Up survey		

Relevant Dates for Phase I: Planning and Engagement

July 1, 2018:	HB 568 passed during the 2018 MGA Legislative Session
November 2018:	Internal MSDE planning
December 14, 2018:	Request for identification of designees
January 2019:	Capacity building with U.S. Department of Education, State Support Team
February 2019:	Needs assessment questionnaire distributed and completed by designees
February 27, 2019:	Panel presenters virtual planning meeting
March 8, 2019:	MSDE Workgroup Meeting #1
March - April 2019:	Follow-up Survey
April 26, 2019:	Report feedback from Workgroup volunteers
May 7, 2019:	Student Data Governance Workgroup Roadmap dissemination and final approval
June 1, 2019:	Report review and acceptance from DoIT
July 1, 2019:	Report submission

Phase II: Development and Application

Year 2 (July 2019 - June 2020)

Engagement	Study	Develop	Report
☑ Convene workgroup	☑ Follow-up survey	☑ Review of relevant state and federal laws	☑ Report on the status of Phase II
☑ Build capacity and institutional knowledge	☑ Identify and discuss barriers within LSSs	☑ Gap analysis between existing laws and best practices	☑ Publish information annually
☑ Review needed tools and resources	☑ Review levels of engagement by county boards	☑ Define relevant terms	☑ Recommend statutory changes
☑ Identify potential partners and roles	☑ Identify available checklists, model policies, tools	☑ Adapt or develop checklists and other tools	
☑ Develop relationships with identified partners	☑ Identify tools and resources available from partners	☑ Adapt or develop model policies	
	☑ Identify training resources	☑ Adapt or develop training resources	

Relevant Dates for Phase II: Development and Application

July 1, 2019:	Weekly MSDE planning meetings with U.S. Department of Education, State Support Team begin
October 2019:	Student Data Governance Workgroup Questionnaire on meeting topics of interest to designees.
November 2019:	MSDE Workgroup Meeting #2
January 2020:	Initial draft development of MSDE Student Data Governance Toolkit
April 20, 2020:	MSDE Workgroup Meeting #3
May 2020:	Student Data Governance Workgroup Questionnaire on information on workgroup recommendations, resources for professional development, and local school system barriers.
May 18, 2020:	MSDE Workgroup Meeting #4
June 3, 2020:	Report dissemination to Student Data Governance Workgroup
June 5, 2020:	Report review and acceptance from DoIT
July 1, 2020:	Report submission

Phase III: Sustainability

Year 3 and Beyond (July 2020 and beyond)

Engagement	Study	Develop	Report
☐ Schedule regular meetings of the Student Data Governance Workgroup	☐ Review draft Toolkit and identify additional areas of need	☐ Develop additional best practice tools, model policies, and other resources	☐ Publish and advertise the Toolkit
☐ Develop purpose and outcomes for Workgroup	☐ Review previously published reports from workgroup and other relevant groups	☐ Develop a schedule to review and modify the Toolkit	☐ Publish information annually
☐ Facilitate engagement between Student Data Privacy Council Workgroup, and other stakeholders	☐ Review relevant Maryland legislation and study impact on local school systems	☐ Develop methods for LSS to share relevant documents with each other	☐ Review progress and evaluate next steps at regularly scheduled workgroup meeting

Planned Dates for Phase III: Sustainability

TBD 2020:	Engagement with leadership groups (Assistant Superintendents, Local Accountability Coordinators, etc.)
October 2020:	DRAFT Toolkit for review by the Student Data Governance Workgroup Workgroup meeting 1
January 2021:	Toolkit Release, version 1
February 2021:	Workgroup meeting 2
June 2021:	Workgroup meeting 3 at the Maryland Connections Summit