

Date: 2/26/2024
To: Sen. Ram Hinsdale
From: Tracy Locklin

Subject: Perspective on H.121

Dear Senator Kesha Ram Hinsdale:

Please allow me to introduce myself. My name is Tracy Locklin, and I am the Chief Privacy Officer of the National Student Clearinghouse, a data services nonprofit that has been serving the education community for 30 years, through a range of services including postsecondary enrollment reporting, degree verification, electronic transcript ordering, and research. The vast majority of degree-granting, Title IV participating postsecondary institutions utilize the Clearinghouse for one or more of our services.

As a registered data broker under the Vermont data broker registry, the Clearinghouse has some concerns about the new data broker requirements in H. 121, a bill that recently passed the House of Representatives and is within the jurisdiction of the Senate Committee on Economic Development, Housing and General Affairs. Although we disclose data only as permitted by the institutions that utilize our services, Vermont's current definition of a "data broker" brings us within the jurisdiction of the Vermont data broker law, and we have been registering as a data broker since the law's inception. Given our unique situation as a non-profit service provider that also qualifies as a Vermont data broker, the new requirements in H. 121 will be problematic for us, the institutions we serve, and the students who benefit from our services.

I am reaching out to you in your capacity as Chair of the Senate committee of jurisdiction for H. 121, and would like to request a virtual meeting with you to provide specific details of our concerns, as well as to propose an approach that would satisfy our concerns with the bill.

I have copied Magali Stowell Aleman, the Committee's Assistant, on this email.

Thank you for considering my request.

Sincerely,
Tracy Locklin