



HOUSE APPROPRIATIONS COMMITTEE

House Bill 912

Institutions of Higher Education - Instructor Training - Accommodations for Students With Disabilities

March 5, 2025

Letter of Information

Chair Barnes, Vice Chair Chang and members of the committee, thank you for the opportunity to offer testimony on House Bill 912. The bill requires institutions of higher education (IHEs) to provide instructors with training on the institution's obligations as it relates to students with disabilities and the federal laws of ADA and Section 504 of the Rehabilitation Act.

The University System of Maryland (USM) is comprised of twelve distinguished institutions and three regional centers. We award eight out of every ten bachelor's degrees in the State. Each of USM's 12 institutions has a distinct and unique approach to the mission of educating students and promoting the economic, intellectual, and cultural growth of its surrounding community. These institutions are located throughout the state, from western Maryland to the Eastern Shore, with the flagship campus in the Washington suburbs. The USM includes three Historically Black Institutions, comprehensive institutions and research universities, and the country's largest public online institution.

The USM does not currently have, nor have campuses budgeted for, the level of broadly-mandated training and instruction called for in House Bill 912. Among the primary concerns in House Bill 912 is the efficacy and appropriateness of faculty being trained to determine accommodations based on a student's disability using a yet-to-be "model training program" developed by the Maryland Higher Education Commission (MHEC). The USM institutions take seriously any considerations that may impact students' current HIPPA and medical confidentiality protections. On each campus, a training program of this scope would require a sizeable and significant multi-department collaboration among disability services, academic affairs, faculty senate, instructional technology/DoIT offices, and university counsel.

Faculty are encouraged to work alongside students and familiarize themselves with programs and staff that manage disability accommodation requests and implementation. Once students have been approved for accommodations by the respective disability services office, they can generate accommodation letters or notices for faculty, and review accommodation letters together in order to determine the best way to implement accommodations in each class.

The offices of disability services at USM institutions (as sampled by the [University of Maryland, College Park](#), [Bowie State University](#), [Frostburg State University](#), and the [University of Baltimore](#)) are well-equipped and properly trained to connect students with disabilities to the services they deserve and expect.

Understanding faculty expectations, and what types of accommodations a student has, and how they will be implemented in a specific course varies. For example, some students may not elect to use all of their indicated accommodations in a course. USM institutions treat all student disability and accommodation information as confidential in accordance with federal laws, including FERPA and ADA. Students are also not obligated to share a specific diagnosis, condition or disability with faculty members while discussing their accommodations.

Strategies that help faculty connect include but are not limited to posting a disability statement on class syllabi; using person-first language such as “students who use wheelchairs” instead of “wheelchair-bound students;” providing referral support for students who may need accommodations through disability services; and planning ahead for exams to confirm accommodations with students prior to each quiz, exam or test.

Reading House Bill 912 in real time presents practical and logistical problems. In addition to required faculty tutorial training on ADA/504 accommodations, the training would **now** need to align with recent regulatory changes pertaining to digital accessibility, inclusive teaching practices, and the use of digital tools and course materials. And while the USM may agree with the bill in principle, there is concern about the requirement that training be completed by all instructors by fall of October 2026. Most faculty will not be available during the summer, which means trainings would need to be offered August – September which is an extremely busy time for faculty and the limited summer staff.

The USM knows you’re well aware of the current budget climate as we all are. The recently proposed deductions to our budget of 5% equate to \$111 million. This is in addition to last year’s cut and another mid-year cut to the FY25 budget which leaves the USM down over \$180 million cumulatively in FY25 and FY26. The imposition of additional policy changes at this time would be more than challenging for all of our campuses on top of these reductions.



