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BILL: HB 688

TITLE: Education - High School Graduation Requirements - Financial Aid Application

DATE: February 25, 2025

POSITION: Oppose

COMMITTEE: House Ways and Means Committee

CONTACT: Mary Pat Fannon, Executive Director, PSSAM

The Public School Superintendents' Association of Maryland (PSSAM), on behalf of all twenty-four local school superintendents **opposes** House Bill 688.

This bill requires each public high school student beginning in the 2026-2027 school year to complete and submit the Free Application for Federal Student Aid (FAFSA) to the U.S. Department of Education or The Maryland State Financial Aid Application (MFSAA) to the Maryland Higher Education Commission as a requirement for graduation. In place of completing the FAFSA or MFSAA, a student or the parent or legal guardian of a minor student may submit to the county board a form stating that the student understands the requirement and declines to complete or submit FAFSA or MSFAA. This act shall take effect October 1, 2025.

Maryland superintendents recognize that completion of FAFSA and MFSAA are important tools for access to higher education, especially for low-income students and families. However, we oppose this legislation for the following reasons:

- **Requiring the completion, or waiver acknowledging an attempt to complete, these documents is wholly inappropriate as a graduation requirement.** Graduation requirements should be student-focused and academic-focused only. No child's diploma should be at risk due to the inability for an adult in their life to file taxes or fail to submit paperwork.

- **The underlying premise of this legislation is that all students are college bound** – a policy clearly not embraced by this Legislature with its heavy investments in College and Career Readiness opportunities through the Blueprint.
- Operational considerations - the legislation **imposes significant fiscal and operational mandates** on local school systems, especially with the current shortages of school counselors. **The fiscal note also clearly explains the state and local investments that will be needed to meet the bill’s requirements to verify that submission has been completed, particularly for the MSFAA.**
- This legislation requires the school districts to delve into the individual family dynamics to navigate the reasons why they have not completed the FAFSA or signed a waiver. **In the current national political climate, we are not comfortable approaching our potentially undocumented families to ask them to sign what may be interpreted as threatening “government” paperwork, causing unnecessary anxiety.**

School systems are heavily engaged in initiatives at both the local and state levels to improve financial aid application completion rates. High school counselors assist students and their families maneuver these applications through one-on-one counseling, parent nights, and evening sessions. Additionally, the Maryland College Application Campaign (MCAC) - a partnership between the Maryland State Department of Education (MSDE), the Maryland Higher Education Commission, and College Goal Maryland - supports students in filling out the FAFSA and provides materials and support to schools and districts.

Mandating FAFSA or MSFAA completion and submission for every student would impose significant financial and operational burdens on schools. Implementation costs will vary significantly by LEA, as those with lower completion rates will likely need more resources to help students and families complete the aid forms. This legislation would also increase workload for school counselors and/or other school staff and may require some school systems to hire additional personnel. As recognized in the fiscal note, Maryland’s ratio of counselors to students is 308 to 1, while the recognized acceptable level is 250 students to one guidance counselor. The fiscal note also indicates that Baltimore City Public Schools estimates that they will need to hire an additional counselor for each of its high schools leading to a \$4.0 million fiscal impact annually beginning in Fiscal Year 2026.

Lastly, also clearly articulated in the fiscal note, “The MSFAA was not designed to grant access to individual completion data by non-MHEC staff. At this time, the **cost** of granting access to local school system staff to this information **cannot be reliably estimated but is likely significant**. Further it is unclear what entity would be responsible for matching MSFAA data All options have costs and other implications that should be considered.”

Our opposition is not a statement on the value or importance of students' completing these important tools, but a realistic description of this bill's new requirements for school systems and already overburdened school counselors. And to reiterate, this legislation is potentially creating a new barrier to high school graduation that has nothing to do with a student's academic achievement and we vociferously oppose this as a new graduation requirement.

For these reasons, PSSAM **opposes** House Bill 688 and kindly requests an **unfavorable** report.