

HB 109: Institutions of Higher Education and Elementary and Secondary Schools - Title VI Coordinators: Please vote TO **OPPOSE** this bill.

Dear Appropriations Committee:

I am writing to respectfully **oppose HB 109**, which mandates Title VI coordinators for institutions of higher education and elementary and secondary schools.

While preventing unlawful discrimination is an important goal, **HB 109 creates unnecessary bureaucracy, expands administrative authority without sufficient guardrails, and risks undermining due process for students, parents, and educators.**

Most school systems and higher education institutions already comply with **federal Title VI requirements** and have existing procedures to address complaints. **HB 109 imposes a state-mandated layer of compliance that is duplicative, costly, and unfunded**, diverting limited resources away from classrooms, instruction, and student support services.

Equally concerning is the **concentration of investigatory and enforcement power** in newly designated coordinators **without clear limits, uniform standards, or robust procedural protections**. Expanding administrative roles with broad discretion **invites inconsistent application, mission creep, and ideological enforcement**, rather than neutral and fact-based adjudication of complaints.

Schools should be environments that promote learning, viewpoint diversity, and fairness—not bureaucratic compliance regimes that eliminate free speech, bypass established disciplinary processes, or substitute administrative judgment for **clear legal standards and due process protections**.

Decisions about staffing structures and compliance mechanisms are best left to **local school boards and institutional governance**, not imposed through statewide mandates that fail to account for differences in size, capacity, and community needs.

Maryland can uphold civil rights **without expanding administrative power, increasing costs, or weakening due process**. **HB 109 does not strike that balance.**

For these reasons, I respectfully urge you to **oppose HB 109**.

Thank you for your time and thoughtful consideration.

Respectfully,
Trudy Tibbals