



Association of Independent
Maryland & DC Schools

Hon. Brian Feldman
Chair
Senate, Education, Energy, and the Environment Committee

Bill: House Bill 505 - Public and Nonpublic Schools - Student School Transfers - Academic Records Documentation
Position: Favorable with Amendments

Chair Feldman, Vice-Chair Kagan, and Members of the Committee,

House Bill 505 appropriately seeks to ensure continuity of education when official records are withheld, but it would benefit from clarification of key terms and additional safeguards regarding the authenticity of unofficial documents in an era of rapidly advancing artificial intelligence tools. Support for intent

We support the bill's purpose of preventing a student's education from being disrupted solely because a sending school declines to release official records in the context of a dispute. Allowing a receiving school to enroll and place a transferring student based on unofficial documentation is a practical solution that prioritizes the student's educational continuity.

Need to clarify "dispute with a student"

We respectfully request clarification of what constitutes a "dispute between the sending school and the student" for purposes of triggering the obligation in subsection (B). It is unclear whether this phrase is intended to cover only tuition or contractual disputes, disciplinary matters, academic integrity issues, or any disagreement that leads the sending school to withhold records. Without a clearer definition or illustrative parameters, schools may interpret this language inconsistently, leading to uneven application of the statute and potential unintended incentives around how and when records are released. We also need clarity as to whether or not this includes a dispute with a student's family or guardian, and who can bring a claim. To address this, the bill could either define "dispute" in § 7-118(a) or cross-reference any existing statutory or regulatory framework governing record holds, so that schools, families, and counsel understand precisely when this section applies.

Verification and AI-generated documents

We also urge caution regarding the broad catch-all language in § 7-118(b)(6), which allows "any other unofficial record or copy of a document" to be used to evidence a student's academic history. The rapid progress and accessibility of artificial intelligence tools has significantly increased the risk that documents such as transcripts, award letters, and score reports can be fabricated or altered in ways that are difficult to detect without verification. To mitigate this risk while preserving flexibility, we suggest:

- Clarifying that acceptance of unofficial documents under § 7-118(b) does not limit a receiving school's ability to verify authenticity with the issuing institution or testing agency when practicable.



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- Encouraging the State Board or the Maryland State Department of Education to develop guidance or minimum best practices for reviewing and validating unofficial records, especially where they are delivered solely by the student or family and lack direct confirmation from the sending school.
- Considering language that prioritizes documents that can be traced back to an originating institution or secure electronic platform (for example, score reports or grade records transmitted via recognized portals), before relying solely on student-supplied copies that could be AI-generated or otherwise manipulated.

These modest clarifications would help ensure that HB 505 achieves its goal of protecting students caught in disputes with their former schools, while recognizing the new verification challenges posed by sophisticated AI tools and preserving the integrity of academic records.

Thanks for your time and consideration,

Peter Baily
Executive Director
AIMS MD&DC