

**HB 109/SB 316:** 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/SB 316**, 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/SB 316 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/SB 316 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/SB 316 does not strike that balance.**

For these reasons, I respectfully urge you to **oppose HB 109/SB 316**.

Thank you for your time and thoughtful consideration.

Respectfully,  
Trudy Tibbals