

**BILL:** House Bill 1074  
**TITLE:** Public Ethics Law - Participation Restrictions and Requirements for Local Governments and School Boards  
**HEARING DATE:** March 10, 2026  
**POSITION:** UNFAVORABLE  
**COMMITTEE:** Government, Labor, and Elections  
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The Maryland Association of Boards of Education (MABE), representing all of the State's local boards of education, **opposes House Bill 1074 – Public Ethics Law - Participation Restrictions and Requirements for Local Governments and School Boards.**

Ethical conduct is fundamental to the work of local boards of education. Board members are entrusted with the governance of public school systems and are expected to act in the public interest. Maryland law already establishes a comprehensive framework governing conflicts of interest, lobbying, and ethical conduct for local board members and school system employees. House Bill 1074 would require local governments and boards of education to revise their ethics laws so that their conflict-of-interest and lobbying provisions are equivalent to or more stringent than those in the Maryland Public Ethics Law.

**Maryland Already Provides a Comprehensive Ethics Framework and Established Removal Standards for Local Boards of Education.**

Local boards operate under ethics policies adopted pursuant to the Maryland Public Ethics Law, and board members receive regular ethics training, including training provided annually by MABE using the Maryland Ethics Commission's model policies set forth in COMAR 19A.05.04. Local board members are also subject to established statutory standards in Education Article § 3-108(d) governing removal from office for immorality, misconduct in office, incompetency, willful neglect of duty, or failure to attend required meetings. The Maryland State Board of Education has long adjudicated removal proceedings under these standards. The resulting decades of MSBE opinions have established that ethical violations fall under the well-established "immorality" and "misconduct in office" standards. Creating a separate and distinct removal provision outside of § 3-108(d) based solely on a conflict-of-interest violation would be inconsistent with this longstanding precedent and may potentially create duplicative or conflicting standards for removal, or introduce uncertainty into a process that the State Board has administered for decades. Maintaining a single, coherent removal structure based on clear standards (that, to be sure, already include conflict of interest violations that meet the threshold) ensures that alleged ethical violations are evaluated within the established due-process framework governing board member conduct.

**School Systems Already Have Strong Conflicts of Interest and Lobbying Policies Aligned to the State.**

House Bill 1074 is also unnecessary because local boards of education already operate under ethics frameworks approved by the State Ethics Commission. Local boards maintain ethics policies governing conflicts of interest and ethical conduct that largely track the Maryland Ethics Commission's model policies set forth in COMAR 19A.05.04, and board members receive regular ethics training, including annual training provided by MABE.

As the bill requires local boards to potentially revise those policies so that their lobbying and conflict-of-interest provisions are equivalent to or more stringent than those contained in the State Public Ethics Law, if they are not already, the bill may create unnecessary additional administrative processes without a demonstrated need.

Finally, the practical benefit of imposing the State's more detailed lobbying framework on local boards is limited. For at least two large school systems in Maryland, the only registered lobbyist is the technology company, Apple. In practice, local boards are rarely the focus of professional lobbying activity. Engagement with boards more commonly occurs through routine communication from parents, educators, community members, and local organizations participating in public meetings and policy discussions. As a result, requiring local boards to mirror the State system could impose additional administrative obligations while providing little practical benefit.

**For these reasons, MABE opposes House Bill 1074 and respectfully urges an unfavorable report.**