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TO: House Ways and Means Committee

BILL: House Bill (HB) 1097 - Education – Sports Injury Recordkeeping and Reporting – Requirements

DATE: March 10, 2026

POSITION: Letter of Information

The Maryland Public Secondary Schools Athletic Association (MPSSAA) submits this written informational only testimony for House Bill 1097 (HB1097), *Public High Schools - Sports Injury Recordkeeping and Reporting - Requirements*. The MPSSAA acknowledges the critical importance of ensuring the health and safety of student-athletes and supports measures that protect their well-being during high school sports events. The MPSSAA respectfully requests the following information be taken into consideration regarding the possible impacts of House Bill 1097.

HB 1097 would require the Maryland State Department of Education (MSDE), in collaboration with the Maryland Department of Health (MDH) and the MPSSAA, to adopt regulations and standardized reporting forms necessary to establish a statewide injury reporting system for student-athletes. While the intent of creating consistent injury data collection is understandable, there are significant operational, financial, privacy, and implementation concerns that warrant careful consideration.

Injury reporting and the use of Electronic Medical Record (EMR) systems are standard practice for certified athletic trainers. However, only a portion of Maryland public high schools currently employ certified athletic trainers as school-based staff. In schools without certified athletic trainers, coaches are required to complete care and prevention training in order to provide immediate assistance until qualified medical professionals arrive. These coaches are not medical professionals and are not typically trained or equipped to manage formal medical documentation systems. Implementing a statewide EMR-based reporting requirement in schools without appropriate medical personnel presents a significant operational challenge.

Establishing and maintaining a standardized EMR platform will create direct financial obligations for local educational agencies (LEAs). These costs would likely include system licensing, user access fees, training, and ongoing maintenance. Depending on the size of the school system and the number of required user licenses, the costs represent a substantial increase for system access, professional development, and ongoing maintenance.

The MPSSAA has concerns regarding the minimum data reporting requirements outlined in HB 1097 and believes additional flexibility is necessary in developing appropriate reporting metrics. The bill requires reporting the date and time of injury, as well as the date a student is authorized to return to participation. Because injuries frequently occur during publicly broadcast or live-streamed events, this level of specificity could inadvertently allow individuals to identify the injured student. Such identification raises serious concerns regarding compliance with state and federal student privacy laws.

To address these concerns, HB 1097 should include language granting MSDE the authority to modify minimum reporting requirements as necessary to protect student health records and ensure compliance with applicable privacy laws.

In many LEAs, athletic directors are primarily employed as classroom teachers and receive a stipend to manage athletic programs in addition to their teaching responsibilities. These individuals work extended hours—from early morning instruction through evening practices and competitions—and are responsible for facility setup, supervision, and event management.

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Adding substantial medical reporting requirements would place additional strain on these already overextended staff members, particularly in schools without certified athletic trainers to assume these responsibilities.

HB 1097 is scheduled to take effect on July 1, 2026. The first day of fall athletic practice for the 2026–2027 academic year is August 12, 2026. This timeline provides MSDE, MDH, and MPSSAA approximately six weeks to develop, approve, and implement a standardized statewide reporting platform serving approximately 200 public high schools. During that same six-week period, LEAs would also be required to train designated personnel on the new system. This compressed timeline presents significant logistical and operational challenges and may jeopardize successful implementation.

The MPSSAA respectfully request that you consider this information as you deliberate HB 1097. For further information, please contact Andy Warner, MPSSAA Executive Director, at 410-767-0376, or Robert.warner1@maryland.gov.