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**BILL:** House Bill 14  
**TITLE:** County Boards of Education - Bullying, Harassment, or Intimidation - Information Collection and Reporting Requirements  
**HEARING DATE:** January 29, 2026  
**POSITION:** LETTER OF INFORMATION  
**COMMITTEE:** Ways and Means  
**CONTACT:** Jessica Goff, Governmental Affairs Associate (jgoff@mabe.org)

The Maryland Association of Boards of Education (MABE), representing all of the State's local boards of education, offers this **Letter of Information for House Bill 14, County Boards of Education - Bullying, Harassment, or Intimidation - Information Collection and Reporting Requirements**, and appreciates the General Assembly's commitment to eliminating discrimination in our school systems.

House Bill 14 would add a requirement to the standardized form for reporting incidents of bullying, harassment, or intimidation. The form would now have to include if the incident is believed to have been motivated in whole or in substantial part by any of the following actual or perceived personal characteristics: race, national origin, marital status, sex, sexual orientation, gender identify, religion, ancestry, physical attributes, socioeconomic status, familial status, or physical or mental ability or disability. The bill would also require county boards to post information in a prominent location on their website about the number of incidents of bullying, harassment, or intimidation reported to the state board by the county board that were determined to be motivated by an actual or perceived personal characteristic of an individual or a group, disaggregated by the motivating personal characteristic.

MABE supports transparency, accountability, and measures taken to identify the prevalence of or trends in bullying, harassment, or intimidation in school systems. The information collected could help strengthen prevention and intervention strategies systemwide. However, we have three items that we would like to highlight: administrative burden, unintentional disclosure of students' identity, and clarifying the phrase, "that were determined to be motivated by" to mean after a complete and impartial investigation.

### **Administrative Burden**

Under Maryland Education Article section 7-424(e), each local board of education must submit to the State Board of Education summaries of report forms it has received. While we see the value in collecting the disaggregated data and even in reporting it to the

State Board, the additional step of requiring local school boards to post the data on their website is an unnecessary burden. This would likely require county boards to divert limited resources from core prevention supports. Rather, the State Board already publishes the summary data. It would be less burdensome for the State Board to add the data it collects to its existing reporting structure. Although, for the reasons identified immediately below, MABE recommends that the State Board adhere to the current requirements and only publish summary information on its website.

### **Unintentional Disclosure of Student's Identity**

While disaggregating data *could* lead to targeted prevention and supports, there is a risk that, especially in small school systems, this disaggregated information could still, even with personally identifiable information removed, lead to the disclosure of a student's identity. For instance, in a school system with a relatively homogenous racial makeup, reporting outcomes for a small subgroup—particularly when combined with other readily available characteristics such as grade level, program participation, or disability status—could make it possible to infer the identity of an individual student, thereby undermining student privacy and confidentiality protections. This is why, in compliance with the Federal Education Rights and Privacy Act (FERPA), [current Maryland State Department of Education \(MSDE\) policy](#) prohibits disclosure of data with an N size of less than 10. As a result, it is likely that much of the disaggregated data that would be collected and reported under section 7-424(f) could not be published.

While we support transparency, we feel the risks of potentially, albeit unintentionally, identifying students outweighs the benefits of requiring the county board to post the disaggregated data on its website. Therefore, MABE recommends removal of the requirement in section 7-424(f) for county boards to publish disaggregated data on their website. In the alternative, MABE recommends that the State Board continue to publish the summary information on its website.

### **Clarification**

If section 7-424(f) is not removed, **we recommend clarifying, with additional specificity, that the phrase “that were determined to be motivated by…” means after a complete and impartial investigation.** In discussions with local school systems, many worried that the requirement in 7-424(f) would result in the reporting of unsubstantiated claims. As we read the language, we understand it to mean only claims that were fully investigated and verified, but additional clarity would remove ambiguity in interpretation.



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Therefore, MABE recommends the language be revised to state, “that were determined after a complete and impartial investigation to be motivated by actual or perceived personal characteristic of an individual or a group, disaggregated by the motivating personal characteristic...”