



MISSOURI HOUSE OF REPRESENTATIVES
WITNESS APPEARANCE FORM

BILL NUMBER: HB 2502		DATE: 2/25/2026	
COMMITTEE: Elementary and Secondary Education			
TESTIFYING: <input checked="" type="checkbox"/> IN SUPPORT OF <input type="checkbox"/> IN OPPOSITION TO <input type="checkbox"/> FOR INFORMATIONAL PURPOSES			
WITNESS NAME			
INDIVIDUAL:			
WITNESS NAME: ARNIE C. "HONEST-ABE" DIENOFF-STATE PUBLIC ADVOCAT		PHONE NUMBER:	
BUSINESS/ORGANIZATION NAME:		TITLE:	
ADDRESS:			
CITY:		STATE:	ZIP:
EMAIL:	ATTENDANCE: In-Person	SUBMIT DATE: 2/25/2026 11:50 PM	
THE INFORMATION ON THIS FORM IS PUBLIC RECORD UNDER CHAPTER 610, RSMo.			

I am in Support of this Bill regarding Student School Records.



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WITNESS NAME		
BUSINESS/ORGANIZATION:		
WITNESS NAME: DOUG CRAWFORD		PHONE NUMBER: 417-276-5143
BUSINESS/ORGANIZATION NAME: STOCKTON R-1 SCHOOL DISTRICT		TITLE: SUPERINTENDENT
ADDRESS: 906 S. STREET		
CITY: STOCKTON		STATE: MO
		ZIP: 65785
EMAIL: dcrawford@stockton.k12.mo.us	ATTENDANCE: Written	SUBMIT DATE: 2/24/2026 7:42 AM

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I am Dr. Doug Crawford and I am the Superintendent of Stockton R-1 School Distirct. HB2502 is crucial in helping former or current students of Charter Schools in ensuring they can advance professionally within their educational careers.

In our district, a Charter school was closed suddenly. Following this closure, there was no guidance regarding the student's educational records. These records simply cannot be located. This causes great harm to the future of our youth. Yearly we recieve phone calls from these former stucents or their parents trying to locate their educational records so that they can enroll in trade schools or colleges. Unforuntatley, we are unable to provide this information for them. It just makes sense that the records of a closed charter school goes to the public school district in which the charter is located.



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WITNESS NAME			
REGISTERED LOBBYIST:			
WITNESS NAME: OTTO FAJEN		PHONE NUMBER: 573-634-3202	
REPRESENTING: MISSOURI NEA		TITLE: DIRECTOR OF LEGISLATIVE POLICY	
ADDRESS: 1810 E. ELM ST.			
CITY: JEFFERSON CITY		STATE: MO	ZIP: 65101
EMAIL: otto.fajen@mnea.org	ATTENDANCE: In-Person	SUBMIT DATE: 2/25/2026 11:53 AM	
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WITNESS NAME			
INDIVIDUAL:			
WITNESS NAME: SARAH BERRY		PHONE NUMBER:	
BUSINESS/ORGANIZATION NAME:		TITLE:	
ADDRESS:			
CITY:		STATE:	ZIP:
EMAIL:	ATTENDANCE: Written	SUBMIT DATE: 2/24/2026 1:05 PM	

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HB 2502 appears to add a new duty in § 161.092(15) requiring DESE to create a method for nonpublic schools that close to file transcripts and student records with a “repository approved by the board,” with board approval of the proposed repository if it “meets the requirements.”

That sounds administrative, but the drafting creates predictable legal and liability issues: FERPA / federal-conditions risk (privacy + federal compliance).

Student education records are governed by FERPA (20 U.S.C. § 1232g; 34 C.F.R. Part 99). A state-created transfer-and-repository system without explicit statutory limits on access, redisclosure, security controls, and retention invites violations and federal funding consequences for districts/agencies that interface with the system.

Unbounded delegation to the State Board (vagueness / arbitrary approval).

The bill requires a repository “approved by the board” but does not set minimum statutory standards (security, auditability, breach reporting, access controls, record formats, retention, chain-of-custody). That is a classic standardless delegation problem and invites inconsistent approvals, arbitrary denials, and litigation exposure under Missouri administrative law principles.

Unfunded mandate + operational failure points.
 Nonpublic schools closing can be chaotic. Without a defined, funded, and standardized process, records can be lost or mishandled—creating foreseeable harms (employment, college admission, disability accommodations) and potential due-process-type claims when students cannot prove coursework or graduation.

Data security and secondary disclosure risk.
 “Repository” is undefined. If records are placed with private vendors or loosely regulated entities, Missouri increases exposure to breach liability, identity theft risks, and disputes over who may access the information—especially if Sunshine Law requests are asserted and the statute is not crystal clear on confidentiality boundaries.

Legislative notice: As drafted, HB 2502 creates a state-sanctioned custody chain for sensitive student records without defined standards, which foreseeably increases privacy breaches, inconsistent administration, and downstream disputes over transcript validity.