

**MMHA - 2023 - SB 848 - Statewide Voucher(2).pdf**

Uploaded by: Aaron Greenfield

Position: FAV



**Bill Title:** Senate Bill 848, Statewide Rental Assistance Voucher Program - Establishment

**Committee:** Education, Energy and Environment

**Date:** February 28, 2023

**Position:** Favorable

This testimony is offered on behalf of the Maryland Multi-Housing Association (MMHA). MMHA is a professional trade association established in 1996, whose membership consists of owners and managers of more than 207,246 rental housing homes in more than 937 apartment communities. Our members house over 667,000 residents of the State of Maryland throughout the entire State of Maryland. MMHA membership also includes more than 216 associate members that supply goods and services to the multi-housing industry. More information is available at <https://www.mmhaonline.org/>

This bill establishes a Statewide Rental Assistance Voucher Program administered by the Department of Housing and Community Development and Public Housing Authorities (PHAs) to provide vouchers and housing assistance payments for low-income families that are on a waiting list under the federal Housing Choice Voucher Program. The Department and each Public Housing Agency must prioritize vouchers and housing assistance payments for families that include a child who is under the age of 16 years, a military veteran, an individual experiencing homelessness, a disabled individual or an elderly individual.

#### Housing Choice Voucher Program

The federal government's housing choice voucher program helps very low-income families, the elderly, and the disabled afford quality housing in the private market. The voucher is provided to the family or individual, which empowers the participant to find the type of housing that fits their needs, including single-family homes, townhouses, or apartments.

Federal vouchers are administered locally by public housing agencies (PHAs), which receive federal funds from the U.S. Department of Housing and Urban Development (HUD). In practice, the PHA pays a housing subsidy directly to the landlord on behalf of the participating family. The family then pays the difference between the actual rent charged by the landlord and the amount subsidized by the program. When authorized under certain circumstances by the PHA, a family may use its voucher to purchase a home.



### Status of Housing Choice Voucher Program

According to the Center on Budget and Policy Priorities, federal funding limitations mean that only 10% of eligible households receive a federal voucher. Of those eligible households, 84% waited more than a year to receive assistance. Many Maryland families are required to wait multiple years before receiving assistance.

In Maryland, the Housing Choice Voucher Program is also over capacity. Those who qualify are fortunate if they can get on a waitlist and access the housing support within years. Each PHA has its individual challenges. Out of the 22 PHAs in Maryland, MMHA understands that only six waitlists are currently open. Of these, the Department of Housing and Community Development Eastern shore waitlist will close at the end of February. While the Baltimore County waitlist is partially open, as of February 2023, and the Montgomery Housing Opportunity Commission is currently processing applications from 2016. In Howard County, “applications for vouchers are not being accepted at this time”. The Commission’s waiting list for vouchers has been closed since June 2012. For those who are on the waiting list, the current projected waiting period for a Voucher is approximately 8-10 years. Unfortunately, it does not appear that the waiting list will be opening for applications in the near future, based on recent funding decisions by the federal government”.

While not a panacea, Senate Bill 848 is an important effort in supporting the housing insecure.

For these reasons, we respectfully request a favorable report on Senate Bill 848.

**Aaron J. Greenfield, MMHA Director of Government Affairs, 410.446.1992**

# **SB0848 Statewide Rental Assistance Voucher Program**

Uploaded by: Cecilia Plante

Position: FAV



## **TESTIMONY FOR SB0848**

### **Statewide Rental Assistance Voucher Program – Establishment**

**Bill Sponsor:** Senator Guzzone

**Committee:** Education, Energy, and the Environment

**Organization Submitting:** Maryland Legislative Coalition

**Person Submitting:** Cecilia Plante, co-chair

**Position:** **FAVORABLE**

I am submitting this testimony in favor of SB0848 on behalf of the Maryland Legislative Coalition. The Maryland Legislative Coalition is an association of activists - individuals and grassroots groups in every district in the state. We are unpaid citizen lobbyists and our Coalition supports well over 30,000 members.

The average wait time to receive a Federal Housing Choice voucher is currently averaging 6 months to 6 years. For low-income residents who need assistance with housing, this is an untenable situation.

This bill would create a stop-gap a statewide Rental Assistance Voucher Program, which would provide vouchers and housing assistance payments for low-income families that are currently on a waiting list under the Federal Housing Choice Voucher Program. The vouchers would be good for up to 5 years or whenever the resident receives a Federal Housing Choice voucher, whichever comes first.

Vouchers and housing assistance payments would be prioritized for families that include: (1) a child who is under the age of 16 years; (2) a military veteran; (3) an individual experiencing homelessness; (4) a disabled individual; or (5) an elderly individual. Disability assistance and, in some cases, a live-in aide will also be provided under this program.

We believe that it is important to keep our residents housed, particularly those residents who are most at risk.

We support this bill and recommend a **FAVORABLE** report in committee.

**CDN SB 848 FAVORABLE.pdf**

Uploaded by: Claudia Wilson Randall

Position: FAV



**Testimony SB 848**  
**Education Energy, and the Environment Committee**  
**February 28 2023**  
**Position: FAVORABLE**

Dear Chairman Feldman and the Education, Energy & the Environment Committee:

The Community Development Network of Maryland (CDN) is the voice for Maryland's community development sector and serves nearly 200 member organizations. CDN—focuses on small affordable housing developers, housing counseling agencies and community-based non-profits across the state of Maryland. The mission of CDN is to promote, strengthen and advocate for the community development sector throughout Maryland's urban, suburban and rural communities.

SB 848- Provides a housing allowance to households that are receiving temporary cash assistance or transitional support services and are not receiving a certain housing subsidy where the tenant's portion of rent is based on a percentage of the tenant's income; and requiring the continuation of a housing allowance for 6 months following the termination of temporary cash assistance if the household is receiving or is eligible to receive Supplemental Nutrition Assistance Program benefits.

In Maryland, households with children, older adults and people with disabilities are most at risk for eviction. Rental assistance not only enables families to meet their housing needs but it leaves them with more resources to meet other basic needs. Evictions create significant costs for state and local governments including costs associated with shelters, education, transportation for homeless youth, foster care, and health care provided in hospitals rather than community- based care.

Many believe that eviction is a high poverty urban problem but it is clear that suburban renters face many of the same challenges as their city counterparts, including eviction. Over the past decade, research shows that evictions reinforce poverty and limit housing opportunities for Maryland's most fragile citizens. The stain of an eviction sets Marylanders on a path of housing insecurity that limits educational and economic opportunities, and increases health problems for them and their families.

A housing allowance could be a lifeline for households throughout the state of Maryland.

We ask that the committee issue a favorable report on SB 848.

Submitted by Claudia Wilson Randall, Executive Director, Community Development Network

# **SB848 JOTF FAV - Statewide Rental Assistance Vouch**

Uploaded by: Ioana Stoica

Position: FAV





*Advocating better skills, jobs, and incomes*

**TESTIMONY IN SUPPORT OF SENATE BILL 848:**  
**Statewide Rental Assistance Voucher Program – Establishment**

TO: Chair Brian J. Feldman and Members of the House Education, Energy, and the Environment Committee

FROM: Ioana Stoica, Policy Advocate

DATE: February 27, 2023

The Job Opportunities Task Force (JOTF) is an independent, nonprofit organization that advocates for better jobs, skills training, and wages for low-income workers and job seekers in Maryland. **JOTF supports Senate Bill 848 as a means of ensuring that low-wage workers across the state who are on the waitlist for federal housing vouchers receive state vouchers in order to support their and their families' housing needs.**

Maryland's low-wage workers are especially vulnerable to housing instability, as they are often faced with rising costs and a lack of affordable housing options. In 2018, the National Low-Income Housing Coalition (NLIHC) released state data on housing affordability by state and county. In the Baltimore City metro area, the NLIHC data shows that a low-wage worker would need to work over 80 hours per week to afford a market-rate apartment. On the state level, affordable housing in Maryland was declared as simply "out of reach," while the data gives a startling glimpse into the reality faced by our low-wage working families and residents.

Steady employment is predicated on affordable housing stability. A 2016 Harvard study showed that stable housing has a direct impact on an individual's ability to maintain employment. This study found that the likelihood of job loss was up to 22 percent higher for individuals who did not have secure housing. Even further, lost employment disrupts the ability to maintain housing – creating a vicious cycle of poverty for Maryland's most vulnerable. At JOTF, through our experience in workforce training, we have found that our workforce program participants are primarily renters and experience housing access and insecurity issues similar to those discussed in the Harvard study.

Economic instability stemming from the pandemic continues to push tens of thousands of Maryland households to the brink of homelessness. Currently, over 108,000 households are still behind on the rent in Maryland and need assistance avoiding eviction. JOTF supports SB 848 as a means to provide housing assistance to households that are on federal voucher waitlists. JOTF understands the fragile relationship that exists between housing and employment: to be stable in your employment, you must have a consistent, reliable, and safe place to live. For these reasons, **we respectfully urge a favorable report on Senate Bill 848.**

For more information on how SB 848 supports a thriving workforce please contact Ioana Stoica, JOTF Policy Advocate at [ioana@jotf.org](mailto:ioana@jotf.org) or 240-643-0059.

**SB 848\_realtors\_fav.pdf**

Uploaded by: Lisa May

Position: FAV



**Senate Bill 848** – Statewide Rental Assistance Voucher Program -- Establishment

**Position: Favorable**

Maryland REALTORS® support SB 848 which would establish a rental assistance program for low-income families who qualify for the federal housing choice voucher program but are put on a waiting list.

The Maryland Department of Housing and Community Development published a housing needs assessment in 2020 which concluded that Maryland has a deficit of 85,000 rental units for its lowest income citizens. The Maryland REALTORS® estimated that a general housing shortage of 120,000 for all families in the state. This chronic undersupply makes housing more expensive.

One of the federal programs which helps poorer families deal with housing costs is the federal housing choice voucher program. Eligible families receive payments to help with their rent costs and those payments often mean the difference between housing or homelessness. While the housing voucher program is well established and has had success, thousands of Maryland families qualify for the program but end up on waiting lists that can be years long.

SB 848 helps address the waiting list problem by creating a state program that will provide voucher assistance to families on the housing choice voucher waiting lists. The assistance is provided for up to 5 years or until the family starts receiving federal assistance.

The Maryland REALTORS® believes SB 848 helps both tenants and landlords and recommends a favorable report.

**For more information contact [lisa.mays@mdrealtor.org](mailto:lisa.mays@mdrealtor.org) or  
[christa.mcgee@mdrealtor.org](mailto:christa.mcgee@mdrealtor.org)**

**SB 848\_Temp Housing Voucher\_Guzzone\_EEE\_2023.pdf**

Uploaded by: Patrick Guibao

Position: FAV



# THE AMERICAN LEGION

Department of Maryland  
Legislative Committee

1020 Wallace Road, Crownsville MD 21032-1318 (Cellular) 443.949.6322 (Email) [patguibao@icloud.com](mailto:patguibao@icloud.com)

February 27, 2023

Chairman Feldman, Madam Vice Chair Kagan and Distinguished Members of the Senate  
Education, Energy and Environment Committee

Senate Bill 848 is an important, vital bill capable of reducing homelessness by placing families in suitable, safe housing.

For the veteran undergoing difficult financial circumstances this measure would be extremely meaningful. The five-year time limit should allow the veteran to transform his or her life to become a more productive member of the community.

The safeguards and limitations contained in SB-848 will allow beneficiaries to exist in proper fashion without personal fear and, at the same time be required to live an appropriate lifestyle that wouldn't harm or intimidate his or her neighbors.

In closing, Senate Bill 848 is a necessary bill and provide a meaningful impact on those benefitting from this measure and The American Legion Department of Maryland asks for a favorable report on this proposal and thank Senator Guzzone for the humanity expressed in SB 847.

Most respectfully,

Patrick J. Guibao  
Legislative Director  
The American Legion  
Department of Maryland

**SB 848\_MAP\_FAV.pdf**

Uploaded by: Stacey Jefferson

Position: FAV



## TESTIMONY IN SUPPORT OF SB 848

### Statewide Rental Assistance Voucher Program - Establishment

*Environment and Transportation*

February 28, 2023 1pm

*Submitted by Kali Schumitz and Mark Huffman, Co-Chairs*

### Member Agencies:

211 Maryland

Baltimore Jewish Council

Behavioral Health System Baltimore

CASH Campaign of Maryland

Energy Advocates

Episcopal Diocese of Maryland

Family League of Baltimore

Fuel Fund of Maryland

Job Opportunities Task Force

Laurel Advocacy & Referral Services,  
Inc.

League of Women Voters of Maryland

Loyola University Maryland

Maryland Center on Economic Policy

Maryland Community Action  
Partnership

Maryland Family Network

Maryland Food Bank

Maryland Hunger Solutions

Paul's Place

St. Vincent de Paul of Baltimore

Welfare Advocates

### Marylanders Against Poverty

Kali Schumitz, Co-Chair

P: 410-412- 9105 ext 701

E: [kschumitz@mdeconomy.org](mailto:kschumitz@mdeconomy.org)

Mark Huffman, Co-Chair

P: (301) 776-0442 x1033

E: [MHuffman@laureladvocacy.org](mailto:MHuffman@laureladvocacy.org)

**Marylanders Against Poverty (MAP) strongly supports SB 848**, which would provide vouchers and housing assistance payments for low-income families on the waiting list for the federal Housing Choice Voucher Program. Federal Housing vouchers are highly effective at reducing homelessness, housing instability, and racial inequities in housing as well as improving other outcomes for families and children – but there are not enough.

[Millions of households in the US with low-incomes are considered severely cost burdened in relation to their housing costs – meaning they spend more than 50% of their income on rent and utilities. This includes an estimated 182,000 households in Maryland with 402,000 people and 135,000 children.](#) Many of these are working families. The gap between housing costs and wages is so great that 5.7 million working renter households – nearly one in five – are included in these severely cost burdened numbers. Because of these cost burdens families are forced to make impossible choices between paying the rent and buying other essentials – like food and medicine. As a result of historic and systemic racism these cost burdened low-income renters are disproportionately people of color (71% in MD). They also include large numbers of seniors and people with disabilities – 49,000 seniors and 67,000 people with disabilities in Maryland.

Housing vouchers can right some of these wrongs and restore balance to family budgets by providing rental assistance that covers fair market rent expenses that exceed 30% of a household's income – the widely used standard for the amount a household can spend on housing and still afford other basic necessities. The benefits of this are not just economic. According to [Empath](#) (Economic Mobility Pathways) in Boston, brain science shows that the psychological trauma of eviction and homelessness as well as ongoing housing instability has negative impacts on the functioning of adults and the brain development of children. Children whose families receive vouchers change schools less frequently, are less likely to be in foster care, experience fewer sleep disruptions and behavioral problems, and exhibit positive social behaviors such as offering to help others or treating younger children kindly.

Unfortunately, in spite of the proven benefits and effectiveness of housing vouchers there are not nearly enough. Only one in four households who qualify for a federal housing voucher have one - with waiting lists that can be years long. SB0848 would begin to close that gap in Maryland by providing housing vouchers for families that qualify for a federal voucher but have not received one.

**MAP appreciates your consideration and urges the committee to issue a favorable report for SB 848.**

*Marylanders Against Poverty (MAP) is a coalition of service providers, faith communities, and advocacy organizations advancing statewide public policies and programs necessary to alleviate the burdens faced by Marylanders living in or near poverty, and to address the underlying systemic causes of poverty.*

**SB 848 - AOBA - FWA.pdf**

Uploaded by: Brian Anleu

Position: FWA





**Bill No:** SB 848—Statewide Rental Assistance Voucher Program – Establishment

**Committee:** Education, Energy, and the Environment

**Date:** February 28, 2023

**Position:** Favorable with amendments

The Apartment and Office Building Association of Metropolitan Washington (AOBA) represents members that own or manage more than 23 million square feet of commercial office space and 133,000 apartment rental units in Montgomery and Prince George’s Counties.

Senate Bill 848 establishes a statewide rental assistance voucher program by the Department of Housing and Community Development to provide housing vouchers and assistance payments for low-income families still waiting under the federal voucher program. The bill also requires local jurisdiction to administer the program.

AOBA supports measures that preserve the state's housing supply and provides additional aid to residents that need assistance with paying rent. SB 848 will expand and increase needed funding for a statewide housing voucher program for low-income families across the state. Over the past months, renters have experienced increased costs in rent, utilities, and other energy; this bill is essential in addressing the challenges of many financially burdened residents by creating this program.

However, AOBA agrees with affordable housing providers and voucher program administrators that the formula for administrative costs is far too low. This could potentially make the program difficult, if not impossible, to administer. AOBA recommends amending the bill to follow HUDs formula for administrative fees.

**For these reasons, AOBA urges a favorable with amendments report on SB 848.**

For further information, contact Brian Anleu, AOBA Vice President of Government Affairs for Maryland at (240)381-0494 or [banleu@aoba-metro.org](mailto:banleu@aoba-metro.org).

**SB848\_Support\_w.Amendments\_FINAL.pdf**

Uploaded by: David Prater

Position: FWA

**In the Senate – Education, Energy, and the Environment Committee**

**SB 848**

**Housing and Community Development – Statewide Rental Assistance Voucher Program --  
Establishment**

**POSITION: SUPPORT WITH AMENDMENTS**

The undersigned individuals and organizations **SUPPORT WITH AMENDMENTS** HB 826.

HB 826 is a ground-breaking proposal that would create a statewide Rental Assistance Voucher Program. HB 826 will provide tenant based rental assistance for low-income Marylanders and prioritizes specific populations for this rental assistance. This would constitute a significant investment in low-income families and produce many of the positive social and economic benefits associated with affordable housing.<sup>1</sup> The intent of the legislation is to replicate the federal housing choice voucher (“Section 8”), but in many areas the legislation **falls short** of the protections in federal regulations provide to families. Specific amendments and proposed language to correct these drafting errors are attached to this testimony as **Exhibit 1**. Without these amendments, specific rights enshrined in federal statutes and regulations will be unavailable to participants, especially for those with disabilities, in the Statewide Rental Assistance Voucher Program. We understand this is not the intent of the legislation.

People with disabilities are more likely than their non-disabled peers to experience unemployment and poverty,<sup>2</sup> and nationwide, about 4.1 million people with disabilities spend more than half of their income on rent.<sup>3</sup> In Maryland, more than half of all people with disabilities had annual household incomes below \$15,000 in 2016.<sup>4</sup> While many people with disabilities receive monthly Supplemental Security Income (SSI) benefits, SSI payments alone are usually not enough to afford market rate housing. In 2022, the average monthly rent of a one-bedroom apartment in Maryland was \$1,111, while monthly SSI payments were just \$841.<sup>5</sup> Consequently, many people with disabilities are forced into homelessness, nursing homes, State hospitals, emergency rooms, and Maryland’s jails and prisons. The Covid-19 pandemic demonstrated just how deadly and unjust the continued segregation of people with disabilities in

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<sup>1</sup> Nabihah Maqbool, et al., *The Impacts of Affordable Housing on Health: A Research Summary*, available at <https://nhc.org/wp-content/uploads/2017/03/The-Impacts-of-Affordable-Housing-on-Health-A-Research-Summary.pdf> (last accessed February 23, 2023).

<sup>2</sup> Debra L. Brucker et al., *Health and Health Services Access Among Adults with Disabilities Who Receive Federal Housing Assistance*, HOUSING POLICY DEBATE, Aug. 29, 2017, at 1.

<sup>3</sup> About 4.1 million people with disabilities nationwide pay more than half of their income on rent. CENTER ON BUDGET AND POLICY PRIORITIES, UNITED STATES FEDERAL RENTAL ASSISTANCE FACT SHEET (2021), <https://www.cbpp.org/sites/default/files/atoms/files/12-10-19hous-factsheet-us.pdf>.

<sup>4</sup> MD. DEP’T OF HEALTH, BRFSS BRIEF: DISABILITY AND HEALTH AMONG MARYLAND ADULTS (August 2018), [https://health.maryland.gov/bhm/DHIP/Documents/BRFSS\\_BRIEF\\_2018-08\\_Disability.pdf](https://health.maryland.gov/bhm/DHIP/Documents/BRFSS_BRIEF_2018-08_Disability.pdf).

<sup>5</sup> TECHNICAL ASSISTANCE COLLABORATIVE, PRICED OUT: THE HOUSING CRISIS FOR PEOPLE WITH DISABILITIES (2021), <http://www.tacinc.org/knowledge-resources/priced-out-v2/>. Maximum SSI payments increased to \$794/month in 2021.

facilities is.<sup>6</sup> Moreover, persons of color are more likely to experience disability.<sup>7</sup> Therefore, the ability of people with disabilities to live in the community is an issue of disability and racial justice.

In recognition of the devastating toll of the pandemic on Marylanders with disabilities and their lack of housing opportunities, the Attorney General and Access to Justice Commission the Covid-19 Access to Justice Taskforce called for more permanent housing solutions for households living in extreme poverty, including people experiencing homelessness and people with disabilities.<sup>8</sup>

A statewide rental voucher program would be a tremendous first step by Maryland to address the housing crisis facing persons with disabilities. In this respect, HB 826 will have a net positive effect on low-income households. On the other hand, such a program could also fill in many of the gaps in federal policy that excludes families from the housing. HB 826's replication of federal housing policies does not expand households eligible for rental assistance, including excluding families based on immigration status. As individuals and organizations who believe housing is a human right, this result is hard to accept especially knowing that different choices could be made.

Nonetheless, the undersigned support this legislation provided the amendments set forth in **Exhibit 1** are made to ensure HB 826 continues the protections guaranteed in current federal law and policy. These amendments are especially needed to ensure people with disabilities have access to needed supports, such as live-in aides, or can seek medical-care they need without having their assistance terminated with the opportunity for a hearing. These amendments also guarantee that the Statewide Voucher Program operates within the Constitutional and civil rights requirements.

For the foregoing reasons, we **support with amendments** HB 826

Respectfully submitted,

Accessible Resources for Independence

Baltimore Renters United

Disability Rights Maryland

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<sup>6</sup> <https://ncd.gov/progressreport/2021/2021-progress-report>

<sup>7</sup> CENTERS FOR DISEASE CONTROL AND PREVENTION, ADULTS WITH DISABILITIES: ETHNICITY AND RACE (last updated Sept. 16, 2020), <https://www.cdc.gov/ncbddd/disabilityandhealth/materials/infographic-disabilities-ethnicity-race.html>.

<sup>8</sup> CONFRONTING THE COVID-19 ACCESS TO JUSTICE CRISIS (JAN. 2021), *available at* [https://www.marylandattorneygeneral.gov/A2JC%20DocumentsI/AG\\_Covid\\_A2J\\_TF\\_Report.pdf](https://www.marylandattorneygeneral.gov/A2JC%20DocumentsI/AG_Covid_A2J_TF_Report.pdf), last accessed February 23, 2023).

The Freedom Center

Homeless Persons Representation Project

Independence Now

Image Center

Main St. Housing

Public Justice Center

Southern Maryland Center for Independent Living

**SB 848**

**Proposed Amendments**

1. 4-2901(B)(2), pg. 3 line 23 thru 26

**Comment:** This is a very restricted definition of disability and is rooted in HUD's definition for supportive housing for persons with disabilities. It is not necessary, or appropriate, for PHAs or the Department to evaluate the duration or the ability of individuals' ability to live independently. We recommend using the more narrow definition in federal civil rights statutes for persons with disabilities. Strike the current definition and replace with the following:

**Proposed language:** "A physical or mental impairment that substantially limits a major life activity."

2. 4-2901(g)(1-2), pg. 4 line 12-15

**Comment:** We were unclear on the need to specifically call out live-in aides in the legislation. Welcome more discussion on that, but it just felt a little strange because it is such a common occurrence. Not opposed to in but insight on the need would be helpful in understanding. We propose language that mirrors that of federal regulations, but does not incorporate by reference.

**Proposed language:** "Live-in aide" means an individual that:

- i) Is necessary for the care and well-being of a member of a Family;
- ii) is not obligated for the of support of the person; and
- iii) would not be residing in the unit expect to provide supportive services to a member of the family.

3. 4-2906, pg. 6 line 5 and 6

**Comment:** We believe the intent is that all of these preferences are equal. The mechanics of preferences for PHAs are that they exhaust households with a preference before moving to families without preferences. The families with preferences are called based on date/time of application. Additionally, we propose that families that include children who have aged out of foster be included as a priority equal to other priority families.

**Proposed language:** "The Department and each public housing agency shall equally prioritize vouchers and housing assistance payments for families that include: ..."

(6) children aging out of foster-care

4. 4-2907, pg. 6 line 13

**Comment:** A fifteen day period to provide documentation is completely unworkable for low-income persons, especially people with disabilities. This may require the submission of an award letter from SSA, which can take an extended period of time. Additionally, PHAs frequently ask about things like bank account statements AND work in the past year, gifts from family members, and any source of income. The documents required are quite extensive. Many of the requirements of time tables, time lines are left to discretion of PHAs in their administrative plans

**Proposed language:** “When an offer of assistance is made, a family ~~has 15 days to provide~~ must provide documentation to verify their income with the department of the public housing agency.”

5. 4-2908(A-B), pg. 6, line 17 thru 24

**Comment:** As discussed in our global comments, a concern with the drafting is the potential roll-back of housing programs at the federal level. We think a better approach to drafting would be incorporating the good provisions of current federal housing programs and omitting the bad ones.

**Proposed language** at line 22: “A family assisted under the State program shall be expected to pay a ~~portion of no more than 30%~~ of its monthly adjusted gross income for rent and utilities, as determined by the department or public housing agency.”

6. 4-2909, pg 6, line 26 thru 29

**Comment:** Time limited assistance has not adequately bridged families to federal rental assistance. DHCD’s RAP allows for one year, and the result is families are typically left homeless or in housing they cannot afford after the end of the year. A five year bridge period, while better than what currently exists, could cause the same effect. Some voucher waiting-lists exceed seven years, particularly in the most populated jurisdictions in the State (Montgomery County, Prince George’s, Baltimore County, and Baltimore City). Some voucher waiting-lists are shorter.

**Proposed language:** Housing assistance payments for a family shall continue ~~for up to 5 years or until a federal housing choice voucher under the federal housing choice voucher program becomes available; whichever occurs first.~~

7. 4-2910, pg. 7, line 2 thru 10

**Comment:** This language would limit live-in aides to only disabled households who are the head of household. This is more restrictive than what federal law and regulations in that it only allows for live-in aides for families of one where the HOH is a person with a disability. Specifically, federal regulations permit: “A family that consists of one or more elderly, near-elderly or disabled persons may request that the PHA approve a live-in aide to reside in the unit and provide necessary supportive services for a family member who is a person with disabilities.” 24 C.F.R. 982.316. Also, to our global comment, the inclusion of 24 C.F.R. 8.11 is a reference to reasonable accommodations in employment at HUD, so the reference doesn’t really check-out.

**Proposed language:** (A) “A family may request that the department or a public housing agency approve a live-in aide to provide necessary supportive services for a family member who is a person with disabilities.” ~~if the family is composed of a disabled individual who is the head of household.”~~

(B) The Department or public housing agency shall reasonably modify its policies, procedures, and rules to allow families that include a person with a disability to have live-in aide ~~approve a live-in aide if a live-in aide is required as a reasonable accommodation under 24 C.F.R. 8.11~~

(C) The Department or a public housing agency may not include a live-in aide’s income when determining a family’s income eligibility under the state program.”



8. 4-2911(B), pg. 7 line 25 thru 29

**Comment:** Paragraph B will have significant collateral consequences for other program participants residing in a building that is disqualified pursuant to this provision. For example, multiple participants may reside in a multi-family complex and if one participant has HQS violations and must relocation, that would require **ALL** families using statewide rental assistance to relocate, but not families using federal housing choice vouchers. Under federal regulations, there is more nuance that require a judgment related to 'a history or practice of non-compliance with HQS for units.' Our proposed edits are intended to mirror these revisions.

**Proposed language:** "A property owner who has a history or practice, as determined by ~~received three or more penalty notices from~~ the Department or a public housing agency, ~~for a violation of~~ of non-compliance with federal housing quality standards is not eligible to lease the owner's properties to families receiving assistance under the State program."

9. 4-2913(A)(1), pg. 8 line 6 thru 14

**Comment:** This provision is confusing. It is unclear if this provision is in reference to a landlord or in reference to a participant. I think it is potentially confusing to try to include both audiences into this provision. However, we propose that it be limited to prospective landlords

**Proposed language:**

4-2913(B)(2)(v), pg. 9 line 22-23

**Comment:** This allows for the automatic termination of families who are absent from a unit for more than 180 days. This does **not** replicate federal regulations and has a significant impact on families with disabilities. Federal regulations allow for termination of a Housing Assistance Payment Contract w/the landlord, 24 C.F.R. 982.312, and a family **may** be terminated from the program if they are absent for 180 days. 24 C.F.R. 982.551 (identifying as discretionary cause to terminate absence from a housing unit), 24 C.F.R. 982.555(a)(1)(v) (requiring a hearing for a family for absence from the unit). This is a significant issue for families with disabilities who may be out of a unit for extended medical absences or stays at rehabilitation centers. If families with disabilities are out of units for more than 180 days, they should have the right to challenge any termination. We would propose that either i) all terminations are discretionary as established in 4-2913(C); or ii) absence from a unit for 180 consecutive days be made a discretionary termination under 4-2913(C).

**Proposed language:** Remove 4-2913(B)(2)(V), and add language at 4-2913(C)(7): "Is absent from a State Program Unit for more than 180 Consecutive Days."

10. 4-2913(C)(2), pg. 10 line 2-3

**Comment:** PHAs may still evict households for marijuana use and so families who have not engaged in prohibited activity in Maryland may be excluded from State Assisted Housing under this provision. Preference is for State assisted housing to fill gaps not filled by federal housing programs. We propose striking, or alternatively limiting language.

**Proposed language:** Either strike this provision; or “has been evicted from federally assisted housing for violent criminal activity that threatens the health, safety, and welfare of residents of federally assisted housing within the preceding 3 years.”

11. 4-2913(E), pg. 10 INSERT NEEDED

**Comment:** There is no explicit requirement in the legislation to provide an informal hearing to participants who are proposed to be terminated or a right to challenge to challenge the factual basis for such a termination. Supreme Court precedent, *Goldberg v. Kelly*, requires that prior to termination of public benefits, such as housing assistance, due process is required before termination of assistance. Therefore, language is needed to guarantee an opportunity for a hearing prior to termination of housing assistance under this program. The proposed language mirrors what is in federal regulations at 24 C.F.R. 982.555

**Proposed Language:** 4-2913 (E) In no event shall assistance be denied or terminated to a family without a written notice of the reason for the family’s denial or termination with an opportunity to challenge the denial or termination at an informal hearing before an impartial hearing officer. At and prior to the informal hearing, Families must be allowed to:

- i) Be represented by an attorney;
- ii) Present evidence and question any witnesses;
- iii) Examine and make copies of any documents directly relevant to the proposed denial or termination.”

12. 4-2914(B)(1), pg. 10 line 10

**Comment:** It is frequent that some households with disabilities will rent units that are within proximity to and owned by family members. This is explicitly allowed by federal regulations at 24 C.F.R. 982.306(d) – “The PHA must not approve a unit if the owner is the parent, child, grandparent, grandchild, sister, or brother of any member of the family, unless the PHA determines that approving the unit would provide reasonable accommodation for a family member who is a person with disabilities.” Therefore, we suggest language that would accommodate the needs of families with disabilities.

**Proposed language:** “A family that receives a voucher under the state program may not 1) have a financial interest in the unit, however the Department of public housing agency may approve a family to reside in such a unit if doing so would reasonably accommodate a family member who is a person with a disability.”

13. 4-2917(B), pg. 12, line 4 thru 12

**Comment:** This provision seemed strange. I am unclear why elderly households may be treated differently than other households. Frequently, you may see an elderly households that have other family members – who are non-elderly – living with them. This is particularly true of households with adult children w/intellectual and developmental disabilities. We proposed striking paragraph (B) entirely. (B)(2) can be addressed through termination for absence from units for greater than 180 days.

**Proposed language:** [Strike paragraph B of 4-2917]

14. 4-2920

**Comment:** We would like to see additional reporting information on i) disability status of any households served; and ii) if the five year limitation on assistance remains, the number of households exiting assistance w/o having received a federal housing choice voucher should also be report on.

**Proposed Language:** 4-2920(7) “The race, disability status, and gender of individuals in families receiving assistance under the State Program.” ...

(14) Families terminated from assistance because they have not received a federal housing choice voucher within the five years of their receipt of State funded housing assistance.”

#### Other Comments

1. **Just Cause Protections.** Under current federal regulations for the Housing Voucher program, landlords can simply not renew a voucher household’s lease. Housing insecurity created by lease non-renewals has a particularly devastating impact on low-income families who cannot afford the costs and expenses of moving such as security deposits, moves, utility hook-ups, and other fees. Of note, ‘just cause’ or ‘good cause’ protections were formally part of the federal regulations implementing the voucher program, but were later repealed.
2. **Screening and Admissions.** Public Housing Authorities have limitations on who can be served, including criteria based on immigration status, income targeting levels for families at or below 50% Area Median Income, and criminal background screenings that limit who is eligible for federal rental assistance programs. The criminal background screenings *exceed* what is illegal in Maryland, such as Marijuana use. State funded program can serve families federal housing programs don’t.
3. **Do Not Incorporate Existing Regulatory Citations, but do include existing language.** Generally, legislation that incorporates other legislation by reference can create problems as those provisions can change or be interpreted in a way to defeat the intent of the legislation. Additionally, given that federal regulations can at times be byzantine, we support more specific language that incorporates the substantive language of relevant regulations over a reference to provision of the United States Code or federal regulations.

**Final -- SB 848 Statewide Vouchers Testimony.pdf**

Uploaded by: Fiona Mesfun

Position: FWA



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February 27, 2023

Senator Brian J. Feldman, Chair  
Senator Cheryl C. Kagan, Vice Chair  
2 West  
Miller Senate Office Building  
Annapolis, Maryland 21401

**RE: Support for Senate Bill 848 – Statewide Rental Assistance Voucher Program – Establishment  
Hearing before the Senate Education, Energy, and the Environment Committee on February 28, 2023**

**Position: Support (FAV) with amendments**

Dear Honorable Members of the Education, Energy, and the Environment Committee,

Thank you for the opportunity to submit testimony on behalf of the Baltimore Regional Housing Partnership (BRHP). I am writing to express our support for Senate Bill 848 – Statewide Rental Assistance Voucher Program – Establishment. The Housing Choice Voucher Program (HCV) is a federally funded, locally administered rental assistance program that subsidizes the rent of lower-income families, the elderly, and disabled to afford decent, safe housing in the private market using federal funds. Currently, there are 77 state-funded housing assistance programs across 34 states, with some states sponsoring multiple programs. This legislation will bring Maryland into line with the growing number of states providing statewide housing choice vouchers and narrowing the ever-widening gap between families in need of rental assistance and available resources.

The Baltimore Regional Housing Partnership (BRHP) is a non-profit organization that expands housing choices for low-income families, who have historically been excluded from housing in well-resourced neighborhoods, helping them access and transition successfully to safe, healthy, and economically vibrant communities. As the Regional Administrator for the Baltimore Housing Mobility Program, BRHP has opened pathways to a better future for low-income families for nearly 10 years. BRHP currently provides over 4,300 low-income families rental assistance in the form of the Housing Choice Voucher coupled with counseling support for families as they move from areas of concentrated poverty to areas of opportunity in Baltimore City and the five surrounding counties.

BRHP is dedicated to helping achieve racially and socially equitable public policy that ensures low-income families access to quality and affordable homes in communities of their choice. **We support Senate Bill 848 because establishing a state-funded housing choice voucher program will help more low-income families access rental assistance and lift thousands of families out of poverty.** Due to scarce program funding, families struggling to afford housing that manage to get off the waiting list for a Housing Choice Voucher must typically wait for years before receiving a voucher, the Center on Budget and Policy Priorities (CBPP) analysis of Department of Housing and Urban Development (HUD) data shows. Among the 50 largest housing agencies, only two have average wait times of

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under a year for families that have made it off the waiting list; the agencies with the longest have average wait times of up to *eight* years. However, these figures gravely understate the unmet need for assistance. Millions of families are eligible for rental assistance and never receive it because they never rise to the top of the waiting list, or they live in communities where the housing agency has closed or lacks a waiting list. For instance, in 2014 the Housing Authority of Baltimore City opened its waitlist for the first time in a decade and more than 75,000 people applied for housing assistance in less than two weeks. Out of that, only 25,000 were chosen and 6,000 to 9,000 were expected to receive one of the housing vouchers.<sup>i</sup> The demand for housing vouchers has far exceeded the amount of funding available, despite the demonstrated benefits of rental assistance and the effectiveness of vouchers specifically.

**The HCV program has three main goals: to provide stable and affordable housing for households with very low incomes, to reduce concentrated poverty, and to improve housing and neighborhood choice.<sup>ii</sup>** Research suggests that vouchers reduce housing cost burdens and homelessness among adults, and suggests that children benefit when their families use vouchers to move to low-poverty neighborhoods.<sup>iii</sup> A seminal study found that children whose families used vouchers to move from high-poverty to low-poverty neighborhoods were more likely to attend college and had higher future earnings compared with children in families with vouchers who did not have this option.<sup>iv</sup> These positive effects increased the longer the children lived in low-poverty neighborhoods. BRHP has seen firsthand how rental assistance can have life-changing impacts – annually, dozens of families successfully graduate from our program, transitioning to homeownership, or are able to sustain themselves financially without support. Voucher assistance is a tool for many families to achieve financial independence and break inter-generational cycles of poverty.

### Background

There is a critical lack of affordable housing options for low-income individuals and families in Maryland. Maryland is the 8th most unaffordable state for housing. In order to afford the Fair Market Rent (FMR) for a two-bedroom unit in Maryland, a person earning minimum wage would have to work over 100 hours per week to avoid paying more than 30% of their income on housing-related expenses.<sup>v</sup> There are 330,120 renter households in the state paying more than 30 percent of their income towards housing costs. Of those housing cost-burdened households, 76 percent have very low-incomes (under 50 percent of Area Median Income) and would therefore be eligible for rental assistance programs. HUD data also demonstrates that of the households with severe cost burdens, paying more than 50 percent of their income towards housing costs, 96 percent have very low incomes. More than 250,000 households could greatly benefit from rental assistance to bring their housing cost burden in line with the national standard, however, waiting lists are long and turnover rates are stagnant within the HCV program. Nearly 50,000 federally funded vouchers are available in the state, yet there are more than 5 times that number eligible for assistance in the State.





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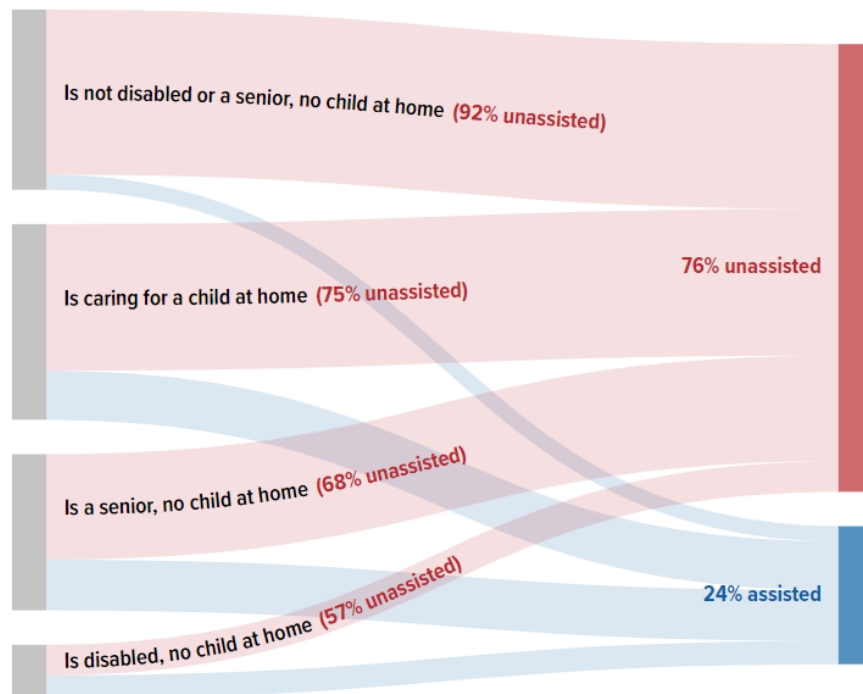
In 2004, DHCD's Office of Research compiled data for Governor Ehrlich's Commission on Housing Policy to highlight the shortage of affordable housing by county. Overall, DHCD projected a need for 120,486 additional units of affordable housing by 2014. Over a decade later, the State has made inadequate progress towards meeting the needs outlined in the report, as the Department of Legislative Services recently noted federal data showing "there is a shortage of approximately 190,700 affordable rental housing units [in Maryland] for families earning less than 50% of the area median income.<sup>vi</sup> Maryland needs a comprehensive approach to mitigating the current housing crisis, which has been exacerbated by the COVID-19 pandemic, that must include as many useful tools as possible. Establishing a statewide housing voucher program will expand rental assistance and help ensure that all Maryland residents have access to quality, affordable homes.

The Baltimore Regional Housing Partnership is an equal housing opportunity provider.



## 76% of Low-Income Renters Needing Federal Rental Assistance Don't Receive It

Unassisted vs. assisted households, headed by someone who:



1

Figure 1 - Center on Budget and Policy Priorities | CPBB.org

### Equity Implications

Unfortunately, the challenges of residing in a state with high living costs are borne disproportionately by minority, low-income families. Black Americans have one of the lowest levels of household income both in Maryland and nationally when comparing income levels by race or ethnicity. Furthermore, data regarding renters and general median income demographics indicate that renters in Maryland are more likely to be minority, low-income, or spend a disproportionate amount of income on rent.<sup>vii</sup> With housing being one of the most researched social determinants of health, a vast library of literature determines a direct link between expanded access to affordable housing and improvements in family

<sup>1</sup> Note: Groups of household types are sized (on left) by the number "needing assistance," which means they pay more than 30 percent of their monthly income on housing and/or are living in overcrowded or substandard housing. "Low income" = 80 percent or less of median income. For more on how we count assisted renters, please see CBPP's [federal rental assistance factsheet methodology](#).





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stability, economic growth, education retention, and health outcomes. Housing matters not only for the immediate well-being of individuals and families but also for the life chances of the subsequent generation. Historically, Black and Brown communities bear the brunt of unjust housing policies that impede progress toward building wealth and housing equity. Establishing a state-funded housing assistance program will equip our state with a sorely needed resource to prevent low-income Brown families from experiencing the detrimental domino effect triggered by housing instability.

### Recommended Changes

Several provisions of SB 848 raise concerns in our view as an administrator of the Federal Housing Choice Voucher program. As a general theme, we believe that it is important to allow Public Housing Authorities (PHA) the ability to administer state-funded vouchers identically to the federally funded vouchers. Specifically, the following provisions raise concerns about how an entity must administer these vouchers:

**Section 4-2906:** Policies for waitlist selections are set by each Public Housing Authority (PHA) in accordance with the particular needs of their jurisdiction. This section and the obligations of the agencies under it may require a PHA to adopt a new or separate waitlist selection criteria, adding administrative burden and possibly creating a bifurcation of waitlist policies for state versus federally funded vouchers.

**Section 4-2907:** Similarly, income verification policies are determined by each PHA in accordance with federal regulations, however timelines for verification may vary across agencies. Requiring a 15-day period for income verification may contradict the current policy for PHA, so we recommend setting a floor of 15 days for income verification, while allowing PHA flexibility to stay consistent with current policy.

**Section 4-2908:** Payment standards are a critical part of a successful voucher program, particularly in empowering households to move to resource-rich neighborhoods. Maryland PHA has made strides in setting varied payment standards to enable voucher households to access neighborhoods throughout the state, not just those where voucher holders tend to concentrate. This section should be clarified to explicitly allow agencies to use any payment standard allowed by HUD, including Small Area Fair Market Rents, HUD-approved Exception Payment Standards, as well as any payment standard associated with a PHA's Moving to Work flexibility.

**Section 4-2909:** This provision, which limits the payments made on behalf of a client to five years, or until a federal Housing Choice Voucher becomes available, presents a significant problem to a PHA. HUD has strict requirements for the execution of the HAP contract, required for all voucher-assisted units. If a household were transitioning from state-funded to federally-funded assistance, the PHA would be faced with an untenable position – having to require the family to vacate the unit in order to allow for HAP execution under the federal contract or eschewing federal regulations to allow





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the family to remain in the unit when executing the contract. We encourage the Committee to strike this section entirely.

BRHP appreciates your consideration and **urges the Committee to issue a favorable report for Senate Bill 848.**

Sincerely,

Adria Crutchfield  
Executive Director  
Baltimore Regional Housing Partnership

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<sup>i</sup> Wenger, Y. 2014. Thousands sign up as city's Section 8 wait list opens for the first time in a decade. *The Baltimore Sun*. [Thousands sign up as city's Section 8 wait list opens for first time in a decade – Baltimore Sun](#)

<sup>ii</sup> Galvez, Martha M. 2010. "What Do We Know about Housing Choice Voucher Program Location Outcomes? A Review of Recent Literature." Washington, DC: Urban Institute

<sup>iii</sup> Ellen, Ingrid Gould. 2020. "What Do We Know about Housing Choice Vouchers?" *Regional Science and Urban Economics* 80:103380.

<sup>iv</sup> Chetty, Raj, Nathaniel Hendren, and Lawrence F. Katz. 2016. "The Effects of Exposure to Better Neighborhoods on Children: New Evidence from the Moving to Opportunity Experiment." *American Economic Review* 106 (4): 855–902.

<sup>v</sup> National Low Income Housing Coalition (2020). Out of Reach. <https://reports.nlihc.org/or>

<sup>vi</sup> Governor's Commission on Housing Policy. (2004.) *Innovative Housing and Community Revitalization in Maryland: Solutions for a Positive Change*.

<sup>vii</sup> U.S. Census Bureau, American Community Survey, 1-Year Estimates, 2021



# **MLA Testimony in Support for Senate Bill 848 rev1.**

Uploaded by: Gregory Countess

Position: FWA



**MARYLAND  
LEGAL AID**

*Advancing*  
**Human Rights and  
Justice for All**

February 27, 2023

The Honorable Chair Brian J. Feldman  
Chair of the Education, Energy and the Environment Committee  
2 West  
Miller Office Building  
Annapolis, Maryland 21401

**Re: Maryland Legal Aid's Testimony in Support for Senate Bill 848**

Dear Mr. Chair and Members of the Committee:

Thank you for the opportunity to testify in support of Senate Bill 848, which would create and establish a Maryland Statewide Rental Assistance Voucher Program. This bill will help to close the affordable housing gap for low-income Marylanders. I submit this testimony on behalf of Maryland Legal Aid (MLA) at the request of Senator Guzzone.

MLA is a non-profit law firm that provides free legal services to the State's low-income and vulnerable residents. MLA handles civil legal cases involving a wide range of issues, including representing people and families struggling with housing and eviction.

There is an affordable housing crisis in this country. The crisis particularly affects extremely low-income families but also has an outsized effect on working people and the elderly. For some of these families, vouchers provide an opportunity to avoid homelessness or to get off of the streets. Though the state has opened its voucher waiting list for some counties on the Eastern Shore the sad fact is many voucher programs throughout the state have closed their waiting list so Marylanders who want to escape homelessness or avoid the potential of being homeless because they are spending more than thirty percent of their income for housing are left with no way out of their dilemma. SB 848 will help some of the 125,00 families who spend more than thirty percent of their income for rent as well the more than 50,000 people who experience homeless each year in Maryland avoid this tragedy<sup>1</sup>. However the bill needs to be amended so that it grants a preference for a particular vulnerable population of Marylander's- children aging out of foster care. If this program is to serve them then it must create a preference for these children while also creating exceptions to rules in the federal program that prevent many of these families and children from being eligible when federal based vouchers are available.

The need for this program is brought into sharp focus by the needs of families and children. Housing instability for children aging out of foster care and former foster care youth has been a long-standing

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<sup>1</sup> See <https://www.hchmd.org/homelessness-maryland> each year more than 50, 000 people experience homelessness.

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problem in Maryland. Many times, aging out of foster care results in a high percentage of homelessness, difficulty obtaining stable housing and employment. These youth who age out of care with no stability are forced to try to find places to sleep; some sleep on the floor or couches of this friend one night and a different person the next night. Sometimes they are in shelters, sometimes with people they do not really know, and for some they are on the streets. These foster children lack a support system. They do not have the same familial safety nets and resources as children who are not in care. Creating a preference for youth aging out of foster care will ensure stable housing which leads to success in all aspects of adulthood.

Current voucher programs do not provide viable options. A Family Unification Program (FUP) voucher rental assistance dedicated to a) FUP-eligible families, and b) youth ages 18 to 24, foster children.<sup>2</sup> However currently there are no FUP vouchers and none on the horizon in Maryland. The Foster Youth to Independence (FYI) voucher makes Housing Choice Voucher (HCV) assistance available to Public Housing Agencies (PHAs) in partnership with Public Child Welfare Agencies (PCWAs).<sup>3</sup> However, there is an extremely lengthy waiting list, or the waiting list is closed. In Montgomery County the FUP vouchers were never really used for children but given more to parents. There is a shortage of vouchers in Montgomery County that foster children can access.

Also, these vouchers are administered locally. Foster youth placed outside their home county are ineligible for a voucher from their home county. They would have to move back to their home county to be eligible for the home county voucher program even if the new area has no vouchers.

Children involved in the child welfare system have experienced trauma and they are among the most vulnerable population in Maryland. SB 848 is a step forward in their journey to becoming productive members of society. Establishing statewide rental assistance would provide foster children with the stability they need to maintain employment and prevent some of the contributing factors to additional children living in unstable homes and experiencing abuse and neglect.

This bill will improve housing stability for low-income Marylanders, especially youth aging out of foster care. **For these reasons, Maryland Legal Aid urges this committee to issue a FAVORABLE report on SB 848.**

Sincerely,

Gregory Countess, Esq.  
Director of Advocacy for Housing and Community Economic Development  
Maryland Legal Aid  
410 951 7687

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<sup>2</sup> A FUP voucher "...applies to youth at least 18 years and not more than 24 years of age (have not reached their 25th birthday) who left foster care, or will leave foster care within 90 days, in accordance with a transition plan described in Section 475(5)(H) of the Social Security Act, and are homeless or are at risk of becoming homeless at age 16 or older [https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/hcv/family](https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/family)

<sup>3</sup> <https://grantsforus.io/type-of-eligible-entity/organizations/local-government-agencies/foster-youth-to-independence-fyi-competitive-2022/>

# **SB848 - Favorable w Amendments - HOC.pdf**

Uploaded by: Ken Silverman

Position: FWA



**Chelsea Andrews**  
Executive Director

**Testimony of Chelsea Andrews,  
Executive Director of the Housing Opportunities Commission  
Favorable with Amendments on SB848 - Statewide Rental Assistance Voucher Program**

Chair Feldman, Vice Chair Kagan, and Members of the Education, Energy, and the Environment Committee:

The Housing Opportunities Commission of Montgomery County (HOC) strongly supports legislation to establish a Statewide Rental Assistance Voucher Program in Maryland. We thank Senators Guzzone, Smith, and Watson for developing this legislation and are eager to put these proposed new resources to work in Montgomery County.

HOC is Montgomery County's Public Housing Authority. We administer about 8,000 federal Housing Choice Vouchers, and serve more than 9,000 additional families through our properties and other programs. Our combined waiting list currently has almost 40,000 applicants and the average wait time to receive a federal Housing Choice Voucher in Montgomery County is 6.5 years. Additional state resources are crucial to be able to provide relief for these families until they are able to access federal assistance or reach self-sufficiency.

We do recommend a technical amendment to the bill to ensure that the program is feasible and sustainable for Housing Authorities. The proposed 1% administrative fee is much lower than the administrative fee provided through the HUD formula for Housing Choice Vouchers, and would simply not provide sufficient resources to administer these additional vouchers. A simple solution would be for the legislation to specify that administrative costs should be covered according to HUD's formula for Housing Choice Vouchers.

Notwithstanding our recommendation for this technical amendment, we hope you will support this legislation so that we can ensure that every family in our state has access to high-quality, affordable housing..

# **SB 848 ACDS Testimony in Support - Statewide Renta**

Uploaded by: Lisa Sarro

Position: FWA





February 28, 2023

**Senate – Education, Energy & Environment**

**SB 848**

**Statewide Rental Assistance Voucher Program -- Establishment**

**POSITION: SUPPORT WITH AMENDMENTS**

SB 848 is a ground-breaking proposal that would create a statewide Rental Assistance Voucher Program which would provide tenant based rental assistance for low-income Marylanders and prioritize specific populations for this rental assistance. This would constitute a significant investment in the goal of ensuring low-income families have housing opportunities and would produce many of the positive social and economic benefits associated with affordable housing.

The intent of this legislation is to replicate the federal housing choice voucher (“Section 8”), which is a critical tool for providing housing opportunities for low income renters. While we support the creation of a statewide Rental Assistance Voucher Program similar to the federal housing voucher program, as drafted, SB 848 does not include the protections that federal regulations provide to families. Without amendment to include those protections, specific rights enshrined in federal statutes and regulations will be unavailable to participants in the Statewide Rental Assistance Voucher Program.

A Statewide Rental Voucher Program would be a tremendous first step by Maryland to address the housing crisis facing low-income Marylanders that would be made even better with amendments to ensure the protections provided to holders of federal housing vouchers are provided to holders of State vouchers as well.

For the foregoing reasons, we urge a **FAVORABLE REPORT WITH AMENDMENTS** on SB 848.

# **HABC SB 848.pdf**

Uploaded by: Crystal Hypolite

Position: INFO

Robin Carter  
Chairperson, Board of Commissioners

Janet Abrahams  
President | Chief Executive Officer



SB 848

February 28, 2023

TO: Members of the Education, Energy and Environment Committee

FROM: Janet Abrahams, Chief Executive Officer

RE: Senate Bill 848 – Statewide Rental Assistance Voucher Program - Establishment

POSITION: Information Request

Chair Feldman, Vice Chair Kagan, and Members of the Committee, please be advised that Housing Authority of Baltimore City requests clarification on Senate Bill 848.

The Housing Authority of Baltimore City (HABC) was established to provide federally funded public housing programs and related services for Baltimore's low-income residents. Through our Public housing and Housing voucher (HCV) programs, HABC serves approximately 43,000 residents in every zip code in Baltimore City.

SB 848 creates a statewide rental assistance voucher program in the Department of Housing and Community Development to provide vouchers and housing assistance payments for low-income families that are on a waiting list under the federal Housing Choice Voucher Program; and requires the Department and public housing agencies to administer the State Program.

HABC is in favor of the bill's intent to provide housing to vulnerable low-income populations and minimize the time in which they stay on the voucher waiting list. However, there are specific concerns about the viability of the program as proposed.

For instance, as written, the State Program limits the time that a family would receive housing assistance through a temporary voucher to five years or until a HUD voucher becomes available, whichever is sooner. HABC is concerned about the possibility that after five years, a HUD voucher may not be

Housing Authority of Baltimore City | 417 East Fayette Street, Baltimore, MD 21202

410.396.3232 www.HABC.org @BmoreHabc

available to a family participating in this program, particularly given the instability of federal funding, and that a family would find themselves without housing assistance.

SB 848 intends to distribute a 1% fee each year to public housing authorities (PHAs) to defray staffing expenses related to the administration of the State Program. In addition to intake and eligibility screening, personnel would be required to perform periodic recertifications of the program participants, inspections of rental units, customer service to applicants and landlords, training, counseling, and ancillary functions. Therefore, HABC requests an increase to the 1% fee, as the average annual administrative fee is significantly higher.

Finally, of most concern to HABC is how applicants would be pulled from our waiting list given the priority households listed in the bill. Currently the bill requires PHAs to prioritize families that are selected for participation in this program that include:

- (1) a child who is under the age of 16 years;
- (2) a military veteran;
- (3) an individual experiencing homelessness;
- (4) a disabled individual; or
- (5) an elderly individual.

Households are placed on our waiting list based on the date and time that HABC receives their application and are not sorted or prioritized based on factors listed above. The bill would in effect require HABC to select households for participation in the State Program over other households that may have been waiting longer and are in a higher position on our waiting list. HABC's applicant waiting list is organized and administered in accordance with federal requirements to avoid discriminating against groups or classes of persons.

While HABC strongly agrees with the bill's intent to decrease the time that families remain on the voucher waiting list and provide more immediate assistance to those in need of housing, the Statewide Rental Assistance Voucher Program – Establishment as currently proposes raises concerns that HABC would recommend being addressed before enacting the program.

Respectfully submitted:

Janet Abrahams, HABC President & CEO