

# **Eileen Benecke Testimony in support of SB 1015.pdf**

Uploaded by: Eileen Benecke

Position: FAV

Eileen Benecke  
New Market, Maryland  
District 4 Frederick County  
February 28, 2024

Senator William C. Smith, Chair  
[will.smith@senate.state.md.us](mailto:will.smith@senate.state.md.us)  
Senator Jeff Waldstreicher, Vice Chair  
Judicial Proceedings Committee  
[Jeff.waldstreicher@senate.state.md.us](mailto:Jeff.waldstreicher@senate.state.md.us)  
2 East Miller Senate Office Building  
11 Bladen Street  
Annapolis, MD 21401

Re: Senate Bill 1015 Condominiums – Mandatory Insurance Coverage -- Alterations  
Hearing Date: February 29, 2024. Position: **Support**

Dear Senator Smith, Senator Waldstreicher and Judicial Proceedings Committee Members,

I am a member of the 2023 HB98 Task Group formed by the Board of Directors of Signature Club at Greenview Condominium in September 2023 to address the impacts of HB98 on our association and our detached condominium owners.

As you know, 2023 HB98 was intended to introduce another option for affordable housing in Maryland by altering the master policy requirements for all detached condominiums. However, there were unintended impacts on condominium associations with attached and detached homes as suddenly the Boards had the option to exclude detached homes from the master policy coverage. While the Board of Signature Club elected to continue covering the detached homes, association counsel recommended at a community meeting called to review 2023 HB98 that “shall” means shall so detached owners should secure their own building coverage.

After 17 years of master policy coverage on all condos, attached and detached, and governing documents that treated all ownership equally in all respects, the relationship between owners changed. Detached owners had to figure out what coverage they needed, and they found insurance agents were caught unaware of HB98 and did not understand the changes nor impacts. In some cases, agents indicated they did not have existing policy forms to match the law.

Our HB98 Task Group heard at the Maryland Insurance Administration’s HB98 Listening Session that a representative of the insurance industry was concerned about who may have an insurable interest at the time of a loss i.e. the master policy holder or the condominium unit owner’s insurance. Concern was also noted that agents may have written a “good” policy but may now have one that does not comply with HB98 law putting the owner and the insurance agent and company at risk for non-compliance and worse.

Senator William C. Smith, Chair  
Senator Jeff Waldstreicher, Vice Chair  
Page Two

There are other administrative impacts to note regarding 2023 HB98:

1. The Association, management companies and insurance companies did not have an existing data basis of detached owners. My insurance company, Erie, sent a notice to me, an attached condo owner, asking for my attached or detached status. Nor did the association community (management companies, lawyers, insurance agents, etc.) have a way to identify the mixed associations short of reviewing all condominium governing documents filed in land records.
2. Our HB98 Task Group was able to find five other similarly mixed condominiums in Frederick, Howard, Carroll and Baltimore Counties impacting 1261 homes. These mixed communities originated between 1997 and 2005. Most likely, there are others.
3. Because association insurance is issued annually, the Board would need to review or confirm its decision to cover/not cover detached condos under the master policy. This would mean annual notices are necessary to let detached condo owners know the status of coverage, as would their mortgage companies, insurance agents, and real estate agents (if detached owners were selling).

Senate Bill 1015/House Bill 1227 as filed will end all the unintended impacts of 2023 HB98 by making master policy coverage mandatory again for all condominium units with mixed attached and detached units and will also mean detached owners can return to using the HO6 owner policy that works as a complement to the master policy.

Thank you for your support of this change to exempt mixed attached and detached condominium from 2023 HB98 insurance law. We appreciate your prompt attention to corrections in 2024.

Sincerely,

*Eileen Benecke*

# **SB 1015 - Detached Condo Insurance - FAV - REALTOR**

Uploaded by: Lisa May

Position: FAV



## **Senate Bill 1015 – Condominiums – Mandatory Insurance Coverage – Detached Units**

### **Position: Support**

Maryland REALTORS® strongly supported 2023's HB 98/SB 403, which expanded the types of insurance coverage that are available condominiums that are developed as single-family detached properties. This legislation, developed over three sessions, provided additional choice in insurance policy structure for detached condo communities.

Unfortunately, several communities have reported that their insurance providers are cancelling existing unit coverage under the community's master policy, and instead requiring unit owners to obtain individual insurance policies.

This action was never mandated under HB 98/SB 403 and is not required under the statute as it stands today. The Attorney General's Office issued guidance on the legislation on August 28, 2023 which stated, in part, that:

***"...nothing in House Bill 98 or elsewhere in State law prohibits the Council to voluntarily provide coverage for detached units in the master policy."***

Further, the Maryland Insurance Administration issued both consumer and industry bulletins in the Fall of 2023 which reiterated this directive by stating:

***"Nothing in the statute prevents the council from voluntarily providing coverage to the owner of a detached residential unit through a policy obtained by the council."***

Nevertheless, we recognize the difficult position that residents of condominium communities have been placed in due to their insurance company's insistence to the contrary.

To the extent that this bill clarifies the existing requirements of Section 11-114 of the Real Property Article and its application to detached condominium communities, the REALTORS® recommend a favorable report on SB 1015.

**For more information contact  
lisa.may@mdrealtor.org or christa.mcgee@mdrealtor.org**

# **Support SB1015 R. Petrin Signature Club at Greenvi**

Uploaded by: Roger Petrin

Position: FAV

Roger Petrin, owner  
Signature Club at Greenview Condominium  
New Market, Maryland  
District 4 Frederick County  
March 1, 2024

Senator William C. Smith, Chair  
[will.smith@senate.state.md.us](mailto:will.smith@senate.state.md.us)  
Senator Jeff Waldstreicher, Vice Chair  
Judicial Proceedings Committee  
[Jeff.waldstreicher@senate.state.md.us](mailto:Jeff.waldstreicher@senate.state.md.us)  
2 East Miller Senate Office Building  
11 Bladen Street  
Annapolis, MD 21401

Re: Senate Bill 1015 Condominiums – Mandatory Insurance Coverage -- Alterations  
Hearing Date: February 29, 2024. Position: **Support**

Dear Senator Smith, Senator Waldstreicher and Judicial Proceedings Committee Members,

My name is Roger Petrin, and I am here to express my support for SB 1015. I am a detached condo unit owner and have been negatively impacted by HB98. At the advice of our association counsel, I terminated my HO-6 condo policy and replaced it with a HO-5 homeowner policy, even though our board continued the master policy for all homes, attached and detached. This move increased my insurance cost by \$600 per year. Others in the community, have said that their increases were between \$400-1,200.

As part of a community task force, we attended a Maryland Insurance Administration HB98 listening session. At the session we learned that HO-3/HO-5 policies were not designed for condos, but instead they were designed for homeowners. The issue lies with who has an “insurable interest”, the homeowner or the condominium association? If our home encounters a peril, which policy best insures my interest? Is it an HO-3, HO-5 homeowner policy or a HO-6 condo policy? Our condo master policy covers all units. Confusion abounds.

I am asking this Committee to vote yes on SB1015. We need to stop the confusion, reduce insurance costs and bring back, HO-6 policies to our community.

Thank you.

*Roger Petrin*

# **Oral Testimony Senate Bill 1015.pdf**

Uploaded by: Tony Burke

Position: FAV



Tony Burke  
Signature Club At Greenview Condominium  
New Market, Maryland  
District 4 Frederick County  
February 28, 2024

## Oral Testimony for Senate Bill 1015

Good afternoon Senator Smith, Senator Waldstreicher and Judicial Proceedings Committee Members.

My name is Tony Burke. I am speaking on behalf of the Signature Club at Greenview Condominium and community in support of SB1015. I am a member of the 2023 HB98 Task Group formed by the Board in September 2023 to address the impacts of HB98 on our association and our detached condominium owners.

2023 HB98 was intended to introduce another option for affordable housing in Maryland by altering the master policy requirements for all detached condominiums. However, there were unintended impacts on condominiums with attached and detached homes. Boards had the option to exclude detached homes from the master policy coverage. Our Board elected to continue covering the detached homes, but our attorney recommended **that "shall" means shall** so detached owners were on their own finding additional appropriate building coverage causing great anguish among the owners, all seniors, many of whom are on fixed incomes.

For the past 17 years, we had master policy coverage on all condos and governing documents that treated all ownership equally.

There were other impacts regarding 2023 HB98:

1. There was no database to find detached condo owners or mixed associations.
2. Our HB98 Task Group found five other mixed condominiums in Frederick, Howard, Carroll and Baltimore Counties impacting 1261 homes. Most likely, there are others.
3. Association insurance is issued annually so the Board would need to review and communicate to many stakeholders its decision to cover/not cover detached condos under the master policy, again another burden and expense for our senior community.

Senate Bill 1015/House Bill 1227 will end the unintended impacts of 2023 HB98 for all mixed attached and detached condominiums.

Thank you for your support to exempt mixed attached and detached condominiums from 2023 HB98 insurance law this year.

**SB 1015 - IA&B-FWA.pdf**

Uploaded by: Bryson Popham

Position: FWA



Insurance Agents  
& Brokers

February 28, 2024

The Honorable William C. Smith, Jr.  
Chair, Senate Judicial Proceedings Committee  
2 East, Miller Senate Office Building  
Annapolis, MD 21401

RE: Senate Bill 1015 – Detached Condominium Units – Support With Amendments

Dear Chair Smith and members of the Senate Judicial Proceedings Committee,

I am writing on behalf of the Maryland Association of Insurance Agents & Brokers (IA&B), a trade association comprised of nearly 200 independent agencies, employing approximately 1,800 licensed Maryland insurance producers, which are located in and doing business throughout the Maryland and the surrounding states.

Independent insurance agents play a crucial role in securing competitive insurance options for condominium associations and individual condominium unit owners. Our members are not restricted to providing rates through a single carrier, and therefore are uniquely well-equipped to understand trends and standards across the entire insurance industry.

Prior to the passage of House Bill 98 last year, insurance agents writing a condominium policy for an individual unit owner could reliably know that the condominium association was required to provide coverage for the unit, minus improvements and betterments installed by the unit owner. Across the insurance industry, all standard forms and policy language for condo unit policies have been carefully constructed for decades with this underlying premise in mind.

The levels and types of coverages provided by condo unit policies (HO-6) are designed to work tongue in groove with a master condo association policy that covers the unit, while your typical homeowners' insurance policy (HO-3, HO-5) is not designed for a condo regime. This system works well, so long as all condo association master policies include coverage on the units, as was the case in Maryland until last year.

However, with the passage of House Bill 98, condominium associations are no longer required to provide coverage on certain detached units. Without significant modification of the policy language on a case-by-case basis, using endorsements or modifications that are not typically included (and may not be available as an option), any HO-6, HO-3, or HO-5 policy will result in insufficient coverage if the master policy does not cover the units, resulting in unpaid claims in the event of a loss.

Senate Bill 1015 is an improvement over House Bill 98 insofar as it limits this fundamental insurance issue to a smaller subset of all-detached condominium associations, but it does not resolve it.



To further complicate things, neither insurance agents nor insurers themselves are equipped with the information necessary to determine whether a condominium development is comprised entirely of similar detached units. The agent who writes a policy for an individual unit owner is unlikely to be the same agent writing a policy for the master association, and such information is unlikely to be provided by the unit owner.

Based on our member experiences, it is a certainty that many units in all-detached condo developments will be insufficiently insured if the requirement to provide coverage on the units is not also applied to all-detached condominium associations. As currently written, Senate Bill 1015 does not resolve this issue, and, in some ways, complicates it further. In order to properly insure any condominium unit within the state of Maryland, agents would not only need to determine whether the unit they are seeking to insure is detached, but would also need to determine whether every other unit within the entire condominium association is similarly detached.

Accordingly, we believe the best approach to the situation is to re-adopt the longstanding coverage model for condominiums that existed in Maryland prior to the passage of House Bill 98, requiring all condominium associations to once again provide coverage on the common elements and units, regardless of whether the association is entirely comprised of similar detached units.

This would have the added benefit of reducing costs for the individual unit owners in these associations, as it is far less costly for a condominium association to take out a single policy covering all units than it is to require each unit owner to obtain a full homeowners' policy on their individual unit.

To that end, we respectfully urge the committee to amend Senate Bill 1015 to return 11-114 to the pre-House Bill 98 language.

Sincerely,

Johnathan Savant  
Government Affairs Director

**SB 1015\_FWA\_MAMIC.pdf**

Uploaded by: Bryson Popham

Position: FWA



191 Main Street, Suite 310 – Annapolis MD 21401 – 410-268-6871

February 28, 2024

The Honorable William C. Smith, Jr.  
Chair, Senate Judicial Proceedings Committee  
2 East, Miller Senate Office Building  
Annapolis, Maryland 21401

RE: Senate Bill 1015 - Condominiums – Mandatory Insurance Coverage – Detached Units - UNFAVORABLE

Dear Chair Smith and Members of the Committee,

On behalf of the Maryland Association of Mutual Insurance Companies (MAMIC), we respectfully support a series of amendments on Senate Bill 1015, should the Committee desire to move it forward.

MAMIC is comprised of 12 mutual insurance companies that are headquartered in Maryland and neighboring states. Approximately one-half of our members are domiciled in Maryland, and are key contributors and employers in our local communities. Together, MAMIC members offer a wide variety of insurance products and services and provide coverage for thousands of Maryland citizens.

Senate Bill 1015 and its House crossfile 1227 were introduced this year to address the confusion from the passage of House Bill 98 last year. The general subject of House Bill 98 was the well-settled law governing insurance coverage for condominium regimes and individual condominium units. That legislation disrupted the orderly process of insuring this type of property, a process which had developed over many years. House Bill 98 has raised continuing questions about the appropriate way for condominium associations, individual condominium unit owners, insurers and their agents to secure the proper insurance coverage on these entities.

Significantly, the witness list on House Bill 98 includes no insurance companies, agents or similar entities, probably because the insurance industry did not understand the intent of the bill or its potential effect. One of the witnesses summarized the problems of the legislation succinctly: “This bill is not properly worded and therefore its purpose is not clear.” That testimony has proven to be accurate. Equally significant is the lack of a letter of information in the bill file from the insurance regulator on that legislation. We trust the Committee will agree that input from those experienced in providing insurance coverage for condominiums, together with input from our State insurance regulator, are essential ingredients for any decision by the legislature on this topic.

This year’s legislation is a good faith attempt to address the questions that arose following the passage of House Bill 98 last year. Unfortunately, substantive coverage questions and issues for condominiums remain, and therefore the potential exists for confusion in the adjudication of claims arising from damage to detached condominium units and structures that would be covered by a master condominium policy.

MAMIC’s position on the bill is unusual. We support the bill with amendments, however, we should explain that our amendments would strike all of the new language in Senate Bill 1015, and furthermore, the amendments would also remove the language adopted in House Bill 98 in 2023 and return the statute to its prior status. Essentially,

our amendments would restart the process. Meanwhile, that would permit order to return to the process of underwriting and placing appropriate condominium insurance coverage, both for master policies and for individual units (whether detached or not). MAMIC also suggests that the amendment language would require a study conducted by the Maryland Insurance Administration to examine the subject of detached units that HB 98 sought to address. The study would direct the Administration to consult with insurers, producers, condominium associations and other stakeholders, and return a report to this Committee with recommendations for any changes in the law that it may believe are appropriate.

With these recommendations and amendments, MAMIC could support passage of Senate Bill 1015. We also pledge to encourage our individual members to participate in any study that may take place under the provisions of this bill.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jeane A. Peters".

Jeane A. Peters, President MAMIC

cc: Bryson Popham



**SB 1015 - IA&B-FWA.pdf**

Uploaded by: Sarah Joan Smith

Position: FWA



Insurance Agents  
& Brokers

February 28, 2024

The Honorable William C. Smith, Jr.  
Chair, Senate Judicial Proceedings Committee  
2 East, Miller Senate Office Building  
Annapolis, MD 21401

RE: Senate Bill 1015 – Detached Condominium Units – Support With Amendments

Dear Chair Smith and members of the Senate Judicial Proceedings Committee,

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Prior to the passage of House Bill 98 last year, insurance agents writing a condominium policy for an individual unit owner could reliably know that the condominium association was required to provide coverage for the unit, minus improvements and betterments installed by the unit owner. Across the insurance industry, all standard forms and policy language for condo unit policies have been carefully constructed for decades with this underlying premise in mind.

The levels and types of coverages provided by condo unit policies (HO-6) are designed to work tongue in groove with a master condo association policy that covers the unit, while your typical homeowners' insurance policy (HO-3, HO-5) is not designed for a condo regime. This system works well, so long as all condo association master policies include coverage on the units, as was the case in Maryland until last year.

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Senate Bill 1015 is an improvement over House Bill 98 insofar as it limits this fundamental insurance issue to a smaller subset of all-detached condominium associations, but it does not resolve it.



To further complicate things, neither insurance agents nor insurers themselves are equipped with the information necessary to determine whether a condominium development is comprised entirely of similar detached units. The agent who writes a policy for an individual unit owner is unlikely to be the same agent writing a policy for the master association, and such information is unlikely to be provided by the unit owner.

Based on our member experiences, it is a certainty that many units in all-detached condo developments will be insufficiently insured if the requirement to provide coverage on the units is not also applied to all-detached condominium associations. As currently written, Senate Bill 1015 does not resolve this issue, and, in some ways, complicates it further. In order to properly insure any condominium unit within the state of Maryland, agents would not only need to determine whether the unit they are seeking to insure is detached, but would also need to determine whether every other unit within the entire condominium association is similarly detached.

Accordingly, we believe the best approach to the situation is to re-adopt the longstanding coverage model for condominiums that existed in Maryland prior to the passage of House Bill 98, requiring all condominium associations to once again provide coverage on the common elements and units, regardless of whether the association is entirely comprised of similar detached units.

This would have the added benefit of reducing costs for the individual unit owners in these associations, as it is far less costly for a condominium association to take out a single policy covering all units than it is to require each unit owner to obtain a full homeowners' policy on their individual unit.

To that end, we respectfully urge the committee to amend Senate Bill 1015 to return 11-114 to the pre-House Bill 98 language.

Sincerely,

Johnathan Savant  
Government Affairs Director

**SB 1015\_FWA\_MAMIC.pdf**

Uploaded by: Sarah Joan Smith

Position: FWA



191 Main Street, Suite 310 – Annapolis MD 21401 – 410-268-6871

February 28, 2024

The Honorable William C. Smith, Jr.  
Chair, Senate Judicial Proceedings Committee  
2 East, Miller Senate Office Building  
Annapolis, Maryland 21401

RE: Senate Bill 1015 - Condominiums – Mandatory Insurance Coverage – Detached Units - UNFAVORABLE

Dear Chair Smith and Members of the Committee,

On behalf of the Maryland Association of Mutual Insurance Companies (MAMIC), we respectfully support a series of amendments on Senate Bill 1015, should the Committee desire to move it forward.

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Senate Bill 1015 and its House crossfile 1227 were introduced this year to address the confusion from the passage of House Bill 98 last year. The general subject of House Bill 98 was the well-settled law governing insurance coverage for condominium regimes and individual condominium units. That legislation disrupted the orderly process of insuring this type of property, a process which had developed over many years. House Bill 98 has raised continuing questions about the appropriate way for condominium associations, individual condominium unit owners, insurers and their agents to secure the proper insurance coverage on these entities.

Significantly, the witness list on House Bill 98 includes no insurance companies, agents or similar entities, probably because the insurance industry did not understand the intent of the bill or its potential effect. One of the witnesses summarized the problems of the legislation succinctly: “This bill is not properly worded and therefore its purpose is not clear.” That testimony has proven to be accurate. Equally significant is the lack of a letter of information in the bill file from the insurance regulator on that legislation. We trust the Committee will agree that input from those experienced in providing insurance coverage for condominiums, together with input from our State insurance regulator, are essential ingredients for any decision by the legislature on this topic.

This year’s legislation is a good faith attempt to address the questions that arose following the passage of House Bill 98 last year. Unfortunately, substantive coverage questions and issues for condominiums remain, and therefore the potential exists for confusion in the adjudication of claims arising from damage to detached condominium units and structures that would be covered by a master condominium policy.

MAMIC’s position on the bill is unusual. We support the bill with amendments, however, we should explain that our amendments would strike all of the new language in Senate Bill 1015, and furthermore, the amendments would also remove the language adopted in House Bill 98 in 2023 and return the statute to its prior status. Essentially,

our amendments would restart the process. Meanwhile, that would permit order to return to the process of underwriting and placing appropriate condominium insurance coverage, both for master policies and for individual units (whether detached or not). MAMIC also suggests that the amendment language would require a study conducted by the Maryland Insurance Administration to examine the subject of detached units that HB 98 sought to address. The study would direct the Administration to consult with insurers, producers, condominium associations and other stakeholders, and return a report to this Committee with recommendations for any changes in the law that it may believe are appropriate.

With these recommendations and amendments, MAMIC could support passage of Senate Bill 1015. We also pledge to encourage our individual members to participate in any study that may take place under the provisions of this bill.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jeane A. Peters".

Jeane A. Peters, President MAMIC

cc: Bryson Popham

# **SB 1015 Testimony (Condominiums – Mandatory Insura**

Uploaded by: Scott Silverman

Position: FWA

Vicki Caine, Chair  
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Susan Saltsman, CMCA, AMS, Member  
Scott J. Silverman, Esq., Member  
John Taylor, Member  
Tricia A. Walsh, CISR, Member

February 13, 2024

will.smith@senate.state.md.us  
jeff.waldstreicher@senate.state.us

Senator William C. Smith, Chair  
Senator Jeff Waldstreicher, Vice Chair  
2 East Miller Senate Office Building  
11 Bladen Street  
Annapolis, MD 21401

**RE: Senate Bill 1015**  
**Condominiums – Mandatory Insurance Coverage – Detached Units**  
**Hearing Date: February 29, 2024**  
**Position: Support**

Dear Chair Smith, Co-Chair Waldstreicher, and Members of the Judicial Proceedings Committee:

This letter is submitted on behalf of the Maryland Legislative Action Committee (“MD-LAC”) of the Community Associations Institute (“CAI”). CAI represents individuals and professionals who reside in or work with community associations (condominiums, homeowners’ associations, and cooperatives) throughout the State of Maryland.

Over the past several legislative sessions, MD-LAC supported a bill that would allow condominium associations with detached units (also known as single family or cottage homes – units not connected to any other dwelling) to transfer the responsibility of insuring those units against property loss to the unit owner. The origin of the bill was a developer(s) who wanted to build detached homes close to one another to create density (which also forced the creation of a condominium regime, but moreover, insurance subject to §11-114 (4) (g) of the Maryland Condominium Act, which requires that the condominium insure the common elements and units absent improvements and betterments installed by unit owners). The 2023 bill was known as House Bill (HB) 98, cross-filed with Senate Bill (SB) 403. The bills became law effective October 01, 2023.

Under the new law, while the detached units remain part of the condominium, subject to the General Liability, Directors and Officers Liability, Fidelity, and any other policies carried by the condominium (including property coverage for any common elements), owners are responsible for providing the

**Maryland Legislative Action Committee**  
**Post Office Box 6636**  
**Annapolis, Maryland 21401**



**Page 2, Senate Bill 1015**  
**Community Associations Institute**

property insurance on the entirety of the units for which they own, rather than being insured under a Master Policy. However, while allowing condominium associations with detached units to shift property insurance responsibility to unit owners may be a good idea for condominium associations comprised 100 percent of other similar detached units, when detached units are part of a larger association with mixed-style condominium units (garden/stacked-style, attached townhouse, and mid- and high-rise style units), the carve-out of detached units within these condominium developments can significantly complicate the income and budget process (including shared amenities and services), as well as the fulfillment of lending guidelines and obligations.

The Maryland Insurance Administration (MIA) issued on September 23, 2023, Bulletin 23-15 ([23-15-Obligation-of-Condominium-Owners-and-the-Council-of-Unit-Owners-of-a-Condominium-to-Purchase-Insurance.pdf \(maryland.gov\)](#)) which allows impacted associations to continue to insure within the Master Policy any detached units they may have. The bulletin was tremendously beneficial in helping impacted associations to avoid removal of detached units from the Master Policy if they were in the middle of a policy term or budget year. It also alleviated the burden of forcing a change that may not be in the best interest of the condominium. That said, the MIA's bulletin cannot be viewed as a long-term repair. Even if an association elects to maintain Property Coverage for its detached units under the Master Policy, the law presently requires owners of detached units to also carry insurance on the entirety of their units. The law, then, has created unintended additional expense to the owners of detached units along with a duplication (or possible exclusion) of coverage by two insurance carriers, which can be problematic when there is a casualty loss.

Senate Bill 1015 seeks to correct the current law's language by limiting the instances when an owner of a detached unit within a condominium is required to carry homeowners' insurance on the entirety of the unit to instead make the law applicable only to those associations that are comprised solely of similar detached units. Condominiums that include detached units within a condominium regime that also includes stacked/attached-style living would simply revert to prior law wherein the condominium association is required to insure the common elements and the units – including detached units – exclusive of improvements and betterments installed in the units by unit owners other than the developer. We ask, then, that the committee find in favor of SB1015 to correct by October 01, 2024, a law that inadvertently created more problems than it did solutions.

We are available to answer any questions the Committee Members may have. Please feel free to contact Lisa Harris Jones, lobbyist for the MD-LAC, at 410-366-1500, or by e-mail at [lisa.jones@mdlobbyist.com](mailto:lisa.jones@mdlobbyist.com); Vicki Caine, Chair of the MD-LAC, 215-806-9143, or by e-mail at [mdlacchair1@gmail.com](mailto:mdlacchair1@gmail.com); Robin Manougian, Member, MD-LAC, at 240-401-0855, or by e-mail at [robin.manougian@baldwinriskpartners.com](mailto:robin.manougian@baldwinriskpartners.com), or Scott Silverman, Esq., Member, MD-LAC, at 410-707-6363, or by email at [ssilverman@schildlaw.com](mailto:ssilverman@schildlaw.com).

Sincerely,

*Robin C. Manougian*  
Insurance Chair, CAI MD-LAC

*Scott J. Silverman, Esq.*  
Insurance Vice-Chair, CAI MD-LAC

*Vicki Caine*  
Chair, CAI MD-LAC