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January 17, 2025

Hon. Brian J. Feldman
Hon. Cheryl C. Kagan
Members of the Maryland Senate Committee on Education, Energy and the Environment
2 West Miller Senate Office Building
Annapolis, MD 21401

Re: Senate Bill 234 Housing and Community Development – Homeless Shelter Certification Program – Establishment, Support with Amendments

Dear Senators Feldman, Kagan and Members of the Committee on Education Energy and the Environment,

Since 1885, Baltimore City-based Helping Up Mission (HUM) has compassionately served people suffering from addiction, poverty and homelessness. In 2024 alone, on our recovery campuses for men and women in the Historic Jonestown neighborhood of East Baltimore, HUM served 2,971 unduplicated men, women and women with children who face head-on the substance use and trauma that has devastated their lives and left their families and communities in tatters.

Helping Up Mission was founded by Abraham Bradenbaugh, a Methodist pastor who left the comforts of a typical Church setting and went to the streets of Baltimore to “help people up” and out of their desperate post-Civil War circumstances. People of faith have kept HUM going and growing for 140 years. These thousands of donors, volunteers and staff are compelled and called to do excellent work every day, to help our neighbors living in desperate life-threatening conditions.

This is the kind of inspired work by faith-based organizations that should be given freedom from as much government regulation as possible to keep expenses low and effectiveness high. Understandably, there is a need for health department inspections, and fire and safety inspections. Faith-based organizations like us have welcomed these inspections and have productive relationships with City, State, and federal regulatory agencies. In fact, today HUM reports to over fifty regulatory groups.

Helping Up Mission is incorporated and operates as a Christian faith-based organization and delivers its services primarily through its signature 365-day Spiritual Recovery Program organized around the 12 Steps. As such, we meet those we serve where they are in their life and addiction journey and are not discriminatory in our admissions or services. HUM has developed broad community provider partnerships that offer embedded primary and behavioral health care for both men and women along with residential support programs for various populations that include access to evidence-based Medication Assisted Recovery (MAR).

In addition, HUM partners with flagship institutions such as Johns Hopkins Hospital, University of Maryland Medical Center, Johns Hopkins Bayview, Cornerstone Clinic of Johns Hopkins University, Johns Hopkins University, and the Hopkins Comprehensive Center for Addiction and Pregnancy to deliver wraparound services and to provide housing partnerships for those facing substance use and homelessness. HUM has

a contract with the US Department of Veterans Affairs to provide transitional housing for both male and female veterans. HUM truly offers an array of residential services as outlined in the attached HUM Summary of Programs.

In greater Baltimore and beyond, Helping Up Mission is an organization that public and private sector organizations turn to help solve problems. Here are a just a few examples:

- In 2023, the City of Baltimore Health Department contracted with HUM to provide Covid-isolation beds to alleviate the burden on area hospitals.
- Through the Next Step program with the hospitals mentioned above, HUM provides housing to people suffering from addiction in the emergency departments but do not require hospitalization.
- When Johns Hopkins Bayview's Center for Addiction & Pregnancy (CAP) needed housing for pregnant, addicted women in 2023, it turned to HUM; today, we have 23 CAP mothers enrolled in our Spiritual Recovery Program and 18 babies residing in our Center for Women & Children.

In 2024, HUM voluntarily sought accreditation from the Commission on Accreditation of Rehabilitation Facilities (CARF) for our residential recovery program, including temporary shelter services. CARF is a nationally recognized, independent, nonprofit accreditor of health and human services organizations. HUM received a three-year CARF accreditation, demonstrating to stakeholders of all stripes that HUM is committed to transparency in its operations, continuous performance improvement, responsive to feedback, and accountable to the people we serve.¹ In addition, Cornerstone Clinic operated by Johns Hopkins University on our campus to provide substance use disorder counseling and behavioral health services is CARF accredited and licensed. We also operate as a subcontractor to the Hopkins Broadway Center for Addiction Level 3.1 program, providing housing and are subject to their licensing and Joint Commission accreditation requirements.

In the 2024 General Assembly, House Bill 577 and Senate Bill 1107 were introduced to create a Homeless Shelter Licensing Program, which would be administered by the Department of Housing and Community Development (DHCD). As enacted, the law required DHCD to conduct a study and report findings and recommendations to the Assistant Secretary of the Homeless Solutions Division of DHCD and this Committee by July 1, 2025. Helping Up Mission reached out to DHCD in July 2024, to no avail, offering to be a resource to DHCD as it conducted the study. Having heard nothing from DHCD, HUM and other providers in the homeless services space reasonably expected DHCD to issue its study later this year. Instead, SB 234 (and its corollary House Bill 577) were introduced on January 8, 2025, seemingly with the mandated study being performed without public input or any transparency or not being performed at all. HUM and other similar faith-based providers were blindsided to learn of the robust and duplicative compliance and regulatory schedule proposed in SB 234/HB 93.

Without the benefit of the legally required study, a critical question must nevertheless be answered: What is the problem that SB 234 seeks to fix?

While HUM acknowledges the necessity for housing providers serving people suffering from homelessness to operate in compliance with health and safety codes and ordinances, and follow risk management best practices, this bill raises many serious issues and requires amendments.

¹ Manuals and materials related to CARF's accreditation process and requirements are voluminous. HUM will provide non-proprietary CARF information to this Committee upon request.

Critical questions to be addressed in amendments:

Would SB 234 treat HUM's entire operation, which consists of two facilities distinctly serving men at a 500-bed building and women and their children at a 250-bed building, -a "homeless shelter"? For purposes of complying with mandatory reporting to the Homeless Management Information System (HMIS), would SB 234 allow a carve-out of the limited number of beds that HUM offers as "overnight shelter"?

HUM's primary focus is addiction recovery and has a compelling interest in preventing admission to people currently and actively using alcohol and/or drugs. Would SB 234 allow an exemption, in whole or in part, for providers like HUM who operate even their temporary shelter beds as part of a recovery program?

Would SB 234 acknowledge accreditation, such as by CARF, as meeting the operational requirements that DHCD will develop for the regulatory structure? Does SB 234 contemplate 1st Amendment and federal statutory protections afforded faith-based organizations, including, but not limited to, federal laws that may not be applicable (e.g., ADA, Federal Fair Housing)?

HUM hopes these and other questions will be given due consideration, and respectfully, we propose the following amendments²:

Amendment to 6-1401 (H) (3):

- "Homeless Shelter" does not include: A facility or program where the participant is enrolled in or identifies as contemplating enrolling in a residential addiction recovery program.
- "Homeless Shelter" does not include: A facility operated by a faith-based organization to care for vulnerable neighbors experiencing homelessness.

Amendment to 6-1401:

- Strike subpart B (29) (Compliance with: ADA, Federal FHA, and other applicable Federal Laws) and substitute: Compliance with applicable Federal Laws.
- Add (F): The Department may accept accreditation by the Commission on Accreditation of Rehabilitation Facilities (CARF) or similar accreditation/certification as satisfaction of the minimum requirements to be applicable to each homeless shelter certification class.

Amendment to 6-1405 (D) (13):

- Strike "current" and state as: Past use of alcohol or illegal drugs, except and individual assessed by shelter staff as a threat to the health, safety or property of others.

Respectfully,



K. Daniel Stoltzfus, MPA
Chief Executive Officer

cc: Sky Woodward, Esq., General Counsel & Chief Administrative Officer, Helping Up Mission
Attachment

² HUM proposes a non-exhaustive list of amendments in this written testimony and states that many more amendments are likely necessary to satisfy it and similar organizations.

MEN'S SPIRITUAL RECOVERY PROGRAM (SRP)

Beds – Up to 225

HUM's "Flagship" program. The Spiritual Recovery Program is the convergence of spirituality and medicine. It is an incredibly innovative recovery model integrating primary healthcare, behavioral health, and evidence-based treatment for substance use disorder with spiritual 12-step principles, workforce development, education, and life enrichment activities. For one full year, participants reside in a therapeutic community and participate in a wide array of comprehensive wrap-around services. HUM aims to empower men to return to their families and communities as leaders and role models.

WOMEN'S SPIRITUAL RECOVERY PROGRAM

Beds – Currently expanding up to 125

HUM's "Flagship" program. The Spiritual Recovery Program is the convergence of spirituality and medicine. It is an incredibly innovative recovery model integrating primary healthcare, behavioral health, and evidence-based treatment for substance use disorder with spiritual 12-step principles, workforce development, education, and life enrichment activities. Participants reside in a therapeutic community and participate in a wide array of comprehensive wrap-around services. This program moved from a leased 40-bed facility on Chase St. to 1216 E. Baltimore St, to our newly constructed 250-bed facility in March 2022.

NEXT STEP PROGRAM

Beds-(up to 20 beds on both men's and women's campuses)

This program operates in partnership with local healthcare institutions, we currently have an agreement with John Hopkins Hospital and Hopkins Bayview. With the advent of Population Health and Total Cost of Care, Maryland hospitals are rated on over-all patient care. The Next Step Program provides local hospitals with a safe, stable residential facility to refer patients who need additional or ongoing care, but do not need to be in a costly hospital bed. Patient care is shared between the health center and HUM. The goal of the program is to help the patient take the next step in the process of their recovery journey.

JOHNS HOPKINS UNIVERSITY (JHU) CORNERSTONE CLINIC AT HELPING UP MISSION

A six-month intensive outpatient program embedded within HUM's Spiritual Recovery Programs which exclusively serves SRP men and women offering substance use disorder (SUD) and mental health counseling in both individual and group sessions. Cornerstone Clinic is operated by JHU and is CARF-accredited and licensed provider who handles their own Medicaid billing for services provided to HUM clients. As part of the agreement with JHU, HUM provides both office space, group rooms and use of telehealth equipment for Cornerstone counselors.

JOHNS HOPKINS BAYVIEW HOSPITAL CENTER FOR ADDICTION & PREGNANCY

Beds – Up to 30 Women and their babies at 1216 E. Baltimore St.

Johns Hopkins Bayview operates a Comprehensive Addiction and Pregnancy (CAP) program that provides outpatient services and programming for pregnant women with substance use disorders. Both CAP and HUM clients often face poverty and homelessness, yet stable housing is an essential element in substance use treatment. The Johns Hopkins Bayview Center for Addiction & Pregnancy (CAP) partnership with HUM offers specialized SUD counseling, clinical and medical services for pregnant and post-partum women concurrently residing at the Women's SRP and their babies. The CAP program is operated by Johns Hopkins Bayview who is a licensed provider to offer medical and clinical services for which they manage the Medicaid billing for any services provided to HUM CAP clients. As part of the agreement with CAP, HUM provides both office space, group rooms and use of telehealth equipment for CAP clinical staff along with transportation to Bayview campus for medical appointments.

JOHNS HOPKINS 911 BROADWAY CLINIC HOUSING PROGRAM

Beds – Up to 38 Men at 1029 E. Baltimore St, Up to 14 Women at 1216 E. Baltimore St.

HUM has a long-standing relationship with John Hopkins Institutions, including Johns Hopkins Hospital and Johns Hopkins University. The Hopkins Housing Program was established in 2008 to a single-point residence for patients enrolled in JHH's Broadway Center for Addictions program. JHH pays a nightly per diem for each program participant, which includes housing and transportation to and from the hospital. While these men and women are not participants in the Spiritual Recovery Program, they do live within the same therapeutic recovery-based community and abide by the same policies and procedures as everyone else. Patients who complete treatment of this program can transition laterally into the Spiritual Recovery Program (SRP) to follow through on their employment and housing goals.

DEPARTMENT OF VETERAN'S AFFAIRS – MEN'S BRIDGE HOUSING

Beds – up to 18

This is a partnership program in collaboration with the Department of Veterans Affairs, providing short term transitional housing for homeless veterans as they work towards accomplishing their goals of securing employment or identifying permanent housing (HUDVASH).

DEPARTMENT OF VETERAN'S AFFAIRS – FEMALE EMERGENT BEDS

Beds – up to 5

This is a partnership program in collaboration with the Department of Veterans Affairs, providing short term transitional housing for female homeless veterans as they work towards accomplishing their goals of securing employment or identifying permanent housing.

GRADUATE TRANSITIONAL HOUSING

Beds – varies based on census on the men's and women's campuses, currently 125-150

Established in 2004, this program provides up to two years of transitional housing following completion of the Spiritual Recovery Program. This aftercare housing provides graduates with an opportunity to

transition into more independent living while still reaping the benefits of accountability from the supportive recovery community.

SEMI-PERMANENT SUPPORTIVE HOUSING PROGRAM

Beds – 21 (each one of three row homes has a capacity of 7)

This program provides the next level of independent living for men who have completed two years in the Graduate Transitional Housing Program. Participants enjoy independent living within close proximity of the HUM supportive campus community. About half of these men are HUM residential staff members. This significant number of staff living on and near the main campus helps to maintain a consistent culture during evening and weekend hours.

GATEWAY TO TRANSFORMATION PROGRAM

Beds – Up to 28 at the Center for Women & Children

The Gateway Program is an up to 30-day residential program is designed for unaccompanied women who need help overcoming life controlling crises or trauma. Our clients include women experiencing homelessness, individuals struggling with drug or alcohol addictions, women fleeing domestic violence and countless others who have run out of options. The primary strategy of this new initiative is to assess and stabilize the client to be placed in the appropriate solution pathway.

OVERNIGHT GUEST SERVICES

Beds – Up to 60 on Men's Campus

Our longest, historical program since our inception in 1885, serves men experiencing homelessness. Individuals sleep in a dormitory style bed and receive two nutritious meals, a hot shower, and clothing. Beyond caring for these basic needs, the program offers hope, encouragement, and the opportunity for real and permanent change. Participants who acknowledge the need for help with alcohol or substance use disorder treatment are interviewed for our residential recovery program.

KEY PROGRAM ACRONYMS AND ABBREVIATIONS

OGS:	HUM's service to individuals experiencing homelessness, Overnight Guest Services
911 Program:	HUM's partnership and contract with Johns Hopkins Broadway Center for Addiction to provide residential services for men and women in this outpatient treatment program which includes medication-assisted treatment and individual/group counseling.
CAP:	The Johns Hopkins Bayview Comprehensive Addiction & Pregnancy (CAP) partnership with HUM which offers specialized SUD counseling, clinical and medical services for pregnant and post-partum women concurrently residing at the Women's SRP and their babies.