



Testimony to the Education, Health and Environmental Affairs Committee

Name: Elizabeth Scott Shatto, Executive Director
Organization: Heart of the Civil War Heritage Area (HCWHA)
Issue: **SB630** Grant Applications and Reporting – Uniform Forms and Requirements
Position: Opposed
Request: **Transition SB630 from Implementation to Study.**
Date: Thursday, February 27, 2020

Let me start by thanking you for your steadfast support of the Maryland Heritage Areas program. As you know, because the Heart of the Civil War Heritage Area (HCWHA) is certified by MHAA, nonprofits within our boundaries in Carroll, Washington and Frederick counties are eligible to apply for MHAA grants. Last year, HCWHA helped secure nearly \$1 million in grant dollars that support projects that generate heritage tourism and stimulate local economies. I am proud that our grantees include small, all-volunteer organizations, mid-sized nonprofits and even government units.

I am writing to express concern about SB630. I think the current bill may have unintended consequences as it does not appear to take into consideration that there are small grant programs administered by different State agencies, and these are frequently grants accessible to nonprofits and small municipalities that do not necessarily seek or receive federal grants.

CARROLL COUNTY
HAMPSTEAD
MANCHESTER
MOUNT AIRY
NEW WINDSOR
SYKESVIL
TANEYTOWN
UNION BRIDGE
WESTMINSTER

The bill plans for Uniform Guidance for federal grants to be followed by all of Maryland's grant programs. This would pose a hardship, even a barrier to some of the organizations served by the Heart of the Civil War Heritage Area through Maryland Heritage Areas Authority grants. Federally modeled statewide application and reporting requirements will likely disenfranchise numerous small granting organizations in Maryland, especially those working with underrepresented groups as grantees.

FREDERICK COUNTY
BRUNSWI
BURKITTSVILLE
EMMITSBURG
FREDERICK
MIDDLETOWN
MOUNT AIRY
MYERSVILLE
NEW MARKET
ROSEMONT
THURMONT
WOODSB

Even working through the Uniform Guidelines to find determine what modifications would be needed to minimize negative impact will require time that is hard to come by. The fact that the legislation provides for a Council that will develop a process to allow nonprofits to be exempted from the requirement is not very helpful. It seems the new law would require burden of time for small grant programs and their applicants just to keep doing grants the way that has been working for them all along.

I hope you will agree that it makes more sense study and inventory all the Maryland grant programs before passing legislation that requires implementation. I do not believe the Maryland Heritage Areas program or its grant applicants were included in old studies of the Urban Institute or the Government Accountability Office; at any rate I was not consulted on behalf of the Heart of the Civil War Heritage Area which is a nonprofit. A study would assure that the impact of reform legislation on Maryland grant programs and their nonprofit grantees will be understood before a new law is implemented.

WASHINGTON COUNTY
BOONSBORO
CLEAR SPRING
FUNKSTOWN
HAGERSTOWN
HANCOCK
KEEDYSVILLE
SHARPSBURG
SMITHSBURG
WILLIAMSPORT

Respectfully submitted,

Elizabeth Scott Shatto, Executive Director

Maryland Heritage Area Coalition

Written and Oral Testimony to the Education, Health and Environmental Affairs Committee

Name: Lucille Ward Walker, Executive Director
Southern Maryland Heritage Area
Chair, Maryland Heritage Area Coalition

Name: Sarah Rogers, Executive Director
Heritage Montgomery
Co-Chair, Maryland Heritage Area Coalition

Issue: SB630 Grant Applications, Reporting – Uniform Forms and Requirements

Position: **Opposed**

Request: **Transition SB630 from Implementation to Study**

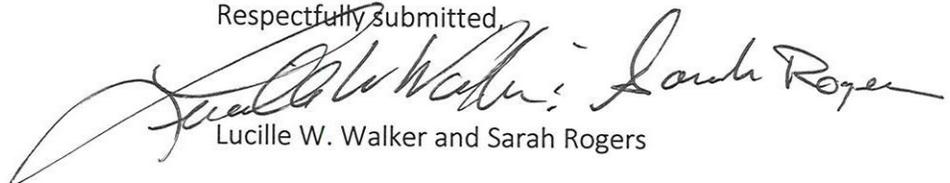
The Maryland Heritage Area Coalition has significant concerns with SB630/HB1539: Grant Applications and Reporting - Uniform Forms and Requirements. SB630/HB1539 will have unintended negative consequences for applicants to Maryland grant programs that do not now have to navigate the complexities of Uniform Guidance (developed for federal grants). The draft legislation states that "the Board shall adopt regulations that adopt the Uniform Guidance in its entirety for all state and local agencies that award state or federal grant funds." Although the legislation does provide for the establishment of a Council that will develop a process for nonprofits to pursue exemption, pursuit of the exemption will require time that is hard to come by for nonprofits that are already stretched to provide services, especially when Maryland grants are already working well without the Federal Uniform Guidelines.

What is particularly disturbing about this legislation is that many underrepresented groups and small organizations may be disenfranchised. The Maryland Heritage Area program has worked for years to make the application process and reporting MORE accessible to all organizations, especially underrepresented populations and smaller groups without the capacity to hire grant writers, compliance officers, post bond/insurance, etc. Federal Uniform Guidance can be a "heavy lift" even for large, well-funded organizations with a full staff.

This legislation has the potential to undue much of the hard work of the Maryland Heritage Area program (and other successful Maryland grant programs) in providing access to a diverse range of grantees throughout Maryland. In short, this legislation, as it stands now, erects a barrier of bureaucracy for funding to many groups who need it the most.

A step back is needed to understand the field and its complexities, using thorough and unbiased methodology. What problem is this bill trying to solve? What will be the impact on successful Maryland grant programs? We are recommending this proposed legislation be changed from "implementation" to "study." That way, the impact of such legislation on all Maryland grant programs and their nonprofit grantees will be understood before implementation is law.

Respectfully submitted,



Lucille W. Walker and Sarah Rogers



PRESERVATION MARYLAND

February 27, 2020

Mr. Chair and Members of the Senate Education, Health, and Environment Committee:

On behalf of the Board of Directors of Preservation Maryland and our thousands of statewide supporters, I would like to offer our support of SB630 with amendments.

Preservation Maryland is the statewide voice for historic preservation that works to protect the best of Maryland. Since 1931, we have worked tirelessly to protect the places, stories and communities in Maryland that matter.

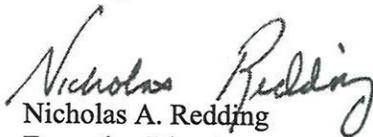
Preservation Maryland has heard from a number of our member organizations about their concerns regarding SB630. Many of the organizations that we advocate for and support through our own Heritage Grant program are small, volunteer groups. Although the legislation provides for a Council that will develop a process to allow certain non-profits to be exempted for undue burden, the pursuit of the exemption will require time that is hard to come by for nonprofits that are already stretched to provide services, especially when Maryland grants are already working well without the Federal Uniform Guidance.

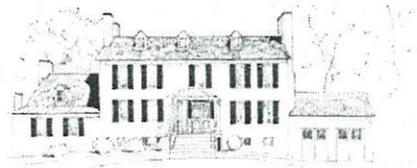
The federal Uniform Guidance, which SB630 requires the Board of Public Works to adopt in its entirety for all state and local agencies that award state or federal grants by July 2024, can be a heavy lift even for large, well-funded, well-staffed organizations. While the purpose of the bill is to make state grants more streamlined, by tying it to Uniform Guidance, many underrepresented groups and small organizations that do not have the capacity to hire grant writers, compliance officers, post bond/insurance, etc. will be disenfranchised. We must work to make sure that in trying to make state grant applications and reporting more accessible, we are not also erecting barriers to funding to many groups who need it the most.

Due to the requirement of the implementation of federal Uniform Guidance by 2024 in this legislation, we are seriously concerned that, if enacted, SB630 would unintentionally prevent small, volunteer, and organizations from underrepresented communities from accessing state funds, such as the Maryland Heritage Areas Authority grant program.

We would however support amending SB630 to a true study bill so that this issue can be examined more closely. This could be achieved by striking the language that sets a timeline for implementation of the adopt regulation that adopt the federal Uniform Guidance in its entirety (SB630, § 2-20 (D)(2)). We believe that invaluable work could be accomplished through this legislation by streamlining the state grant process, but we share in the concerns of our member organizations that it could unintentionally exclude certain groups. We ask that you consider amendments that would ensure these concerns are addressed.

Sincerely,


Nicholas A. Redding
Executive Director



Friends of Chapman State Park

www.friendsofchapmansp.org

P.O. Box 857

Bryans Road, MD 20616

Linda Dyson, FCSP President

February 25, 2020

BILL: SB630 Grant Applications and Reporting – Uniform Forms and Requirements
Senate Committee – Education, Health and Environmental Affairs
2 West Miller Senate Office Building

POSITION: **OPPOSED**

RECOMMENDATION: Redirect bill from Implementation to Study

To whom it may concern:

SB630/HB1539 will have unintended negative consequences for applicants to Maryland grant programs that do not now have to navigate the complexities of Uniform Guidance (developed for federal grants). The draft legislation states that "the Board shall adopt regulations that adopt the Uniform Guidance in its entirety for all state and local agencies that award state or federal grant funds." Although the legislation does provide for the establishment of a Council that will develop a process for nonprofits to pursue exemption, pursuit of the exemption will require time that is hard to come by for nonprofits that are already stretched to provide services, especially when Maryland grants are already working well without the Federal Uniform Guidelines.

What is particularly disturbing about this legislation is that many underrepresented groups and small organizations may be disenfranchised. The Maryland Heritage Area program has worked for years to make the application process and reporting MORE accessible to all organizations, especially underrepresented populations and smaller groups without the capacity to hire grant writers, compliance officers, post bond/insurance, etc. Federal Uniform Guidance can be a "heavy lift" even for large, well-funded organizations with a full staff.

This legislation has the potential to undue much of the hard work of the Maryland Heritage Area program (and other successful Maryland grant programs) in providing access to a diverse range of grantees throughout Maryland. In short, this legislation, as it stands now, erects a barrier of bureaucracy for funding to many groups who need it the most.

A step back is needed to understand the field and its complexities, using thorough and unbiased methodology.

**Essentially: What problem is this bill trying to solve?
What will be the impact on successful Maryland grant programs?**

We are recommending this proposed legislation be changed from "implementation" to "study."

That way, the impact of such legislation on all Maryland grant programs and their nonprofit grantees will be understood before implementation is law.

Sincerely,

Sheryl Elliott, Ph.D.
Board Member, Friends of Chapman State Park

The Patuxent River Naval Air Museum Association, Inc.

22156 Three Notch Road • Lexington Park • Maryland 20653 • Telephone 301-863-1900

February 26, 2020

BILL: SB630 Grant Applications and Reporting – Uniform Forms and Requirements

Senate Committee – Education, Health and Environmental Affairs
2 West Miller Senate Office Building

POSITION: **OPPOSED**

RECOMMENDATION: Redirect bill from Implementation to Study

SB630/HB1539 will have unintended negative consequences for applicants to Maryland grant programs that do not now have to navigate the complexities of Uniform Guidance (developed for federal grants). The draft legislation states that *"the Board shall adopt regulations that adopt the Uniform Guidance in its entirety for all state and local agencies that award state or federal grant funds."* Although the legislation does provide for the establishment of a Council that will develop a process for nonprofits to pursue exemption, pursuit of the exemption will require time that is hard to come by for nonprofits that are already stretched to provide services, especially when Maryland grants are already working well without the Federal Uniform Guidelines.

What is particularly disturbing about this legislation is that many underrepresented groups and small organizations may be disenfranchised. The Maryland Heritage Area program has worked for years to make the application process and reporting MORE accessible to all organizations, especially underrepresented populations and smaller groups without the capacity to hire grant writers, compliance officers, post bond/insurance, etc. Federal Uniform Guidance can be a "heavy lift" even for large, well-funded organizations with a full staff.

This legislation has the potential to undue much of the hard work of the Maryland Heritage Area program (and other successful Maryland grant programs) in providing access to a diverse range of grantees throughout Maryland. In short, this legislation, as it stands now, erects a barrier of bureaucracy for funding to many groups who need it the most.

A step back is needed to understand the field and its complexities, using thorough and unbiased methodology.

Essentially: What problem is this bill trying to solve?

What will be the impact on successful Maryland grant programs?

RECOMMENDATION: The proposed legislation be changed from "implementation" to "study."

That way, the impact of such legislation on all Maryland grant programs and their nonprofit grantees will be understood before implementation is law.



Amy Davis

Administrator
Patuxent River Naval Air Museum Association

Preserve • Educate • Inspire

FARM HERITAGE CONSERVANCY
Preservation, Cultivation, Education

PO Box 226
Benedict, Maryland 20612
(301) 274-4685

fhcbenedict2015@gmail.com
a 501(c)3 non-profit

26 February 2020

BILL: SB630 Grant Applications and Reporting – Uniform Forms and Requirements
Senate Committee – Education, Health and Environmental Affairs
2 West Miller Senate Office Building

POSITION: OPPOSED

RECOMMENDATION: Redirect bill from Implementation to Study

Dear Maryland Legislators,

The Farm Heritage Conservancy, a 501©3 non-profit, has significant concerns with SB630: Grant Applications and Reporting - Uniform Forms and Requirements. We are in opposition to the bill as presented and request to change this bill's status from Implementation to Study.

SB630/HB1539 will have unintended negative consequences for applicants to Maryland grant programs that do not now have to navigate the complexities of Uniform Guidance (developed for federal grants). We are particularly concerned that underrepresented groups and small organizations, like the Conservancy, may be disenfranchised. The application process and reporting should be more accessible to all organizations, especially underrepresented populations and smaller groups who have no capacity to hire grant writers, compliance officers, post bond/insurance. The Federal Uniform Guidance is a "heavy lift" even for large, well-funded organizations with a full staff.

This legislation has the potential to undue much of the hard work of many successful Maryland grant programs in providing access to a diverse range of grantees throughout Maryland. In short, this legislation, as it stands now, erects a wall of bureaucracy for funding to many groups who need it the most.

There are two questions that need to be answered before this bill would be enacted into law; What problem is this bill trying to solve? What will be the impact on successful Maryland grant programs? We are asking that this proposed legislation be changed from "implementation" to "study."

Thank you for your time and consideration, if there are any questions, I may be contacted at the number below.

Sincerely,



Franklin A. Robinson, Jr.
Chair, Farm Heritage Conservancy
301-399-1636



February 25, 2020

TESTIMONY

Lisa Ludwig

Lower Eastern Shore Heritage Area

Opposed

**REQUEST: Transition SB630 from Implementation to Study
SB630/HB1539: Uniform Guidance on Maryland Grants**

SB630/HB1539 will have unintended negative consequences for applicants to Maryland grant programs that do not now have to navigate the complexities of Uniform Guidance (developed specifically for federal grants). The draft legislation states that "On or before July 1, 2024, the Board shall adopt regulations that adopt the Uniform Guidance in its entirety for all state and local agencies that award state or federal grant funds." Although the legislation does provide for the establishment of a Council that will develop a process for nonprofits to pursue exemption, pursuit of the exemption will require time that is hard to come by for nonprofits that are already stretched to provide services, especially when Maryland grants are already working well without the Federal Uniform Guidelines.

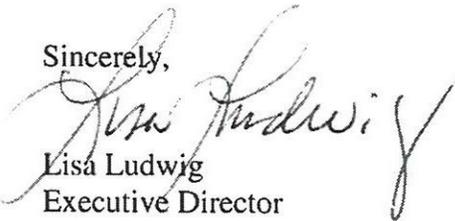
What is particularly disturbing about this proposed legislation, is that many underrepresented groups and small organizations will be disenfranchised. The Maryland Heritage Area Program has worked for years to make the application process and reporting MORE accessible to all organizations, especially underrepresented populations and smaller groups without the capacity to hire grant writers, compliance officers, post bond/insurance, etc.

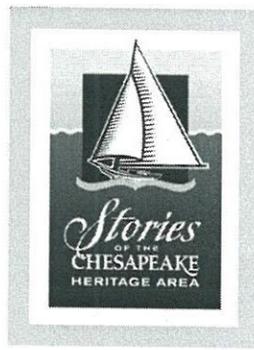
Federal Uniform Guidance is a "heavy lift" even for large, well-funded organizations with a full staff. This legislation will gut the Maryland Heritage Area Program (and others) and provide barriers to funding to many groups who need it the most. These are the very people that we work hard to help in our local communities day to day.

A step back is necessary to understand the field and its complexities, using thorough and unbiased methodology. Essentially: What problem is this bill trying to solve?

We are recommending this proposed legislation be changed from "implementation" to "study." In this manner the impact of such legislation on all Maryland grant programs and their nonprofit grantees will be understood before implementation is law.

Sincerely,


Lisa Ludwig
Executive Director



Testimony to the Senate Education, Health, and Environment Committee

Name: Gail Webb Owings, Executive Director
Organization: Stories of the Chesapeake: The Heritage Area of Caroline, Kent, Queen Anne's, and Talbot Counties
Issue: SB630
Position: Opposed

The Stories of the Chesapeake Heritage Area wishes to express its concerns about SB630 and requests a change to a study bill. While well meaning, the bill has unintended consequences particularly for the numerous small mostly volunteer nonprofits found in the rural counties served by the Stories of the Chesapeake. Many applicants to grant programs such as those from the Maryland Heritage Area Authority, Rural Maryland Council, Maryland State Arts Council, the African American Heritage Preservation Grant Program, and Maryland Historical Trust that work closely with small non-profit organizations by providing small grants will be disenfranchised by the provisions of this bill.

Maryland's Heritage Area program is the most successful of its kind in the country and frequently used as a model for other states seeking to build a strong economic base in heritage tourism. MHAA and other similar programs have worked tirelessly to simplify their grants process to make their programs assessible to all Marylanders. This bill disregards these efforts and most likely result in a more complex process.

Clearly, many Maryland nonprofits and the State grant agencies they call upon for support weren't considered in the legislation as it is drafted. Perhaps a step back to understand the field and its complexities, using thorough and unbiased methodology, makes more sense. That way, the impact of such legislation on all Maryland grant programs and their nonprofit grantees, will be understood before implementation is law.

Over the years, we've seen that a one size fits all rarely works for Maryland. It is doubtful that a one grant process for all will work either. Please send this bill to study.