

Dear Delegate Barve:

Thank you for permitting me to explain our opposition to HB592 on Tuesday. The sponsor's testimony stated very directly that this bill is about licensing property managers. However, it is written to allow regulation and taxing of COCs with little or no input from COCs. I ask that this bill be given an unfavorable report or that any reference to COCs not pertaining to licensing property managers be stripped from the bill.

I hope my written testimony makes clear the problems with this bill. Delegate Holmes' sponsorship of HB1054 supports my fears that the proposed State Board will certainly impose mandatory training on COC Boards, which will need a registry to implement and will be very expensive. At the end of my oral testimony on HB592, I responded to a question that we opposed "even a registry of COCs." We do so because it is a means to other ends such as a registry of COCs and mandatory training. There are no guidelines in HB592 as to who can have access to information in the registry and how the information can be used. Issues of privacy and limits on what information can be collected are not addressed. The cost of implementing and maintaining the registry is not addressed, but certainly will be expensive as my testimony documented and will be used to justify a mandatory fee on COCs of an amount "to be determined."

Similar versions of this bill have been rejected for the past several years by House and/or Senate committees. Nothing has changed to make this bill necessary or desirable. It will result in another tax on thousands of homeowners living in COCs. I write to ask that you do not give a favorable report to HB592. If you do, I ask that the bill be amended according to the suggestions at the end of my written testimony.

Thank you for your consideration.

Arthur T. Johnson, President
Foxhall Farm Cluster Home Association