

**Letter of Information****House Bill 87 – Short-Term Rentals and Home Amenity Rentals – Taxation, Regulation, and Crimes***Ways and Means / Environment and Transportation**January 28, 2025*

The Office of the Comptroller would like to thank Delegate Foley for introducing House Bill 87 (HB87), Short-Term Rentals and Home Amenity Rentals – Taxation, Regulation, and Crimes, and for allowing our office to provide input. HB87 establishes various provisions related to short-term rentals and home amenity rentals, including a reporting requirement. The Office of the Comptroller suggests three amendments, for your consideration:

**1. Change the reporting date:** Currently, the reporting requirement outlined on page 4, lines 6 – 15, requires that owners of short-term rental units and home amenity rentals report the number of times or nights their units were rented in the prior calendar year to the Comptroller on or before January 1. As written, this provision only provides owners with one day for reporting the prior year of activity. Amending this requirement to instead be on or before January **31** would create a more reasonable timeline and would keep this reporting requirement in line with other reporting deadlines, such as the deadline to report withholdings.

**2. Consider enforcement language:** The language in HB87 provides no enforcement provisions or penalties for non-compliance for the reporting requirement and therefore our agency would have no mechanism to enforce this requirement. We therefore recommend including language authorizing the Comptroller to adopt regulations to administer Business Regulation Article § 15-304, Maryland Annotated Code.

**3. Clarification is needed where there is no rental intermediary:** The language on page 3, lines 3 – 20, establishes certain health and safety requirements for short-term rental units and home amenities, and specifies that the rental intermediary shall provide the owner with the necessary funds to comply with these requirements. However, it does not address rental units without a rental intermediary. We request clarification regarding how these provisions apply to rental units that do not use a rental intermediary.

Thank you for your consideration of these potential amendments. If you have any questions, please feel free to reach out to Matthew Dudzic at [MDudzic@marylandtaxes.gov](mailto:MDudzic@marylandtaxes.gov).

