



CALVERT COUNTY BOARD OF COUNTY COMMISSIONERS

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March 11, 2025

The Honorable Edith Patterson
Chair, Southern Maryland Delegation
429 Lowe House Office Building
6 Bladen Street
Annapolis, MD 21401

Dear Chair Patterson,

We are writing to express concerns regarding House Bill 93 and Senate Bill 234, which seeks to establish a certification program for homeless shelters in Maryland. While the intent to ensure quality and consistency in shelter services is commendable, we urge the State to consider modifications to the bill that would better align with the operational realities of shelters and prevent unintended consequences that could reduce shelter capacity across the state.

The primary concern with the proposed certification program is that the requirements appear too cumbersome for most shelters to meet. Unlike hospitals, long-term care facilities, residential treatment centers, or childcare centers—entities that operate on a fee-for-service model—homeless shelters are nonprofit organizations that rely primarily on grants and donations to sustain their operations. Implementing certification requirements and imposing related penalties without providing complementary funding for both operating and capital costs may place shelters in a financially precarious position, potentially leading to closures and a subsequent reduction in available shelter beds statewide.

To address these concerns while still promoting quality services for Maryland's homeless population, we recommend that the bill be amended to:

1. **Shift from mandatory certification requirements to the establishment of best practice standards** – Instead of imposing a certification process that may be unattainable for many shelters, the State should develop voluntary best practice standards that provide a framework for shelters to enhance service delivery without creating undue administrative and financial burdens.
2. **Offer incentives for compliance with best practice standards** – Shelters that demonstrate adherence to these standards could receive priority consideration for state grants, technical assistance, or other forms of support. This approach would encourage improvement without threatening the viability of existing shelter programs.
3. **Allow more time to develop reasonable guidelines if certification remains a requirement** – The *Maryland Homeless Shelter Certification Recommendations Phase 1 Report* indicates that from January to April 2025, the Department of Housing & Community Development (DHCD) will be engaging key stakeholders, including county governments, through focus groups, interviews, and surveys on the Phase 1 report findings. Given that these activities have yet to take place statewide, including in our jurisdiction, the proposed legislation is premature. Additionally, the report lacks comparisons and input from other states that operate shelter certification programs, such as Michigan, Texas, and New York. There are likely valuable lessons to be learned from their implementation.

Maryland Relay for Impaired Hearing or Speech: 1-800-735-2258

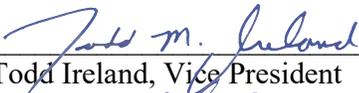
Maryland's shelters play a crucial role in providing safety and support to our most vulnerable populations. Any legislative efforts to enhance shelter services must be designed to uplift and support these essential programs rather than inadvertently reducing capacity. We respectfully urge you to consider these recommendations to ensure that House Bill 93/Senate Bill 234 achieves its intended goal without placing undue hardship on the very organizations working to combat homelessness.

Thank you for your time and consideration. We would welcome the opportunity to discuss these concerns further and work collaboratively toward a solution that benefits both shelters and the individuals they serve. Please contact Jennifer Moreland, Director of Community Resources, at Jennifer.Moreland@calvertcountymd.gov or (410) 535-1600, Ext. 8801 to arrange further discussion on this issue.

Sincerely,
BOARD OF COUNTY COMMISSIONERS
CALVERT COUNTY, MARYLAND



Earl F. Hance, President



Todd Ireland, Vice President



Mark C. Cox Sr.



Catherine M. Grasso



Mike Hart

CC: Jake Day, Secretary, Maryland Department of Housing & Community Development
Senator Michael A. Jackson, District 27
Delegate Mark Fisher, District 27C
Delegate Jeffrie E. Long, Jr., 27 B
Delegate Todd B. Morgan, District 29C