

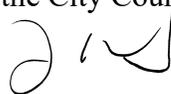
Robin Truiett-Theodorson
Chairperson | Board of Commissioners

Janet Abrahams
President | Chief Executive Officer



MEMORANDUM

TO: The Honorable President and Members of the City Council

FROM: Janet Abrahams, Chief Executive Officer 

CC: Mayor's Office of Government Relations

DATE: February 20, 2026

SUBJECT: City Council Bill 25-0141 Rental Dwelling Health and Safety Enforcement Act

The Housing Authority of Baltimore City (HABC) has received a referral for comment on City Council Bill 25-0141. This bill is seeking to update certain provisions regarding the licensing of rental dwellings; establishing certain penalties; requiring certain information be filed with a registration statement when applying for a rental dwelling license; requiring the Department of Housing and Community Development to promulgate certain regulations; creating a registry of rental inspectors; prohibiting certain actions based on actual or perceived immigration, status; establishing certain grounds for the revocation of a rental dwelling license; establishing a process for rental dwelling receivership; making conforming changes; providing for the effective dates of this Ordinance; and generally relating to the enforcement of rental dwelling health and safety standards.

HABC has concerns about Section 5-15 (b) (10), which lists the following actions as grounds for denial, suspension or revocation of a rental dwelling license or renewal:

“(I) DEMANDING, REQUESTING, OR COLLECTING INFORMATION REGARDING OR RELATING TO THE IMMIGRATION OR CITIZENSHIP STATUS OF A TENANT, PROSPECTIVE TENANT, OR APPLICANT FOR TENANCY;

(II) DISCLOSING OR THREATENING TO DISCLOSE INFORMATION REGARDING OR RELATING TO THE IMMIGRATION OR CITIZENSHIP STATUS OF A TENANT, PROSPECTIVE TENANT, OR APPLICANT TO ANY PERSON, ENTITY, OR LAW ENFORCEMENT AGENCY;

(III) REFUSING TO ENTER INTO A RENTAL AGREEMENT, APPROVE A SUBTENANCY, OR OTHERWISE PRECLUDE FROM OCCUPYING A DWELLING UNIT, A TENANT, PROSPECTIVE TENANT, OR APPLICANT FOR TENANCY, BASED SOLELY OR IN PART ON THE IMMIGRATION OR CITIZENSHIP STATUS OF THE TENANT, PROSPECTIVE TENANT, OR APPLICANT FOR TENANCY; OR

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(IV) BRINGING AN ACTION TO RECOVER POSSESSION OF A DWELLING UNIT 11 BASED SOLELY OR IN PART ON THE IMMIGRATION OR CITIZENSHIP STATUS OF A TENANT...”

Although properties owned and operated by HABC are not subject to the licensing requirements of this bill, we are concerned about the indirect consequences that the above-referenced provisions would have on privately owned and/or privately managed rental properties, which lease to tenants who are assisted with, or that contain units which receive rental subsidy provided through federal funding (e.g. tenant-based or project-based housing choice vouchers, project-based rental assistance, etc.). Under federal law, HABC is required to document and verify the citizenship and eligible immigration status of individuals before admitting them to the Public Housing or Housing Choice Voucher programs, and federal funds cannot be used to provide rental assistance to individuals who are deemed ineligible based on citizenship status. Additionally, privately managed properties are required to perform regular recertifications for tenants who receive federally funded rental assistance, and citizenship status and eligibility are again documented and verified during this process. We are concerned that the provisions about collecting information regarding immigration status may put these properties at risk of losing their license and/or jeopardizing their federal funding, thereby impeding their ability to provide affordable housing for those in need.

Therefore, HABC respectfully requests that language be added to carve out an exception for these circumstances and suggests inserting “unless required by federal law” at the end of Line 33 so that it reads:

“(10) TAKING 1 OF THE FOLLOWING ACTIONS, UNLESS REQUIRED BY FEDERAL LAW:...”

HABC remains committed to protecting residents’ rights and will continue to do so within the scope of federal regulations.