BALTIMORE CITY COUNCIL
LABOR & WORKFORCE COMMITTEE

Mission Statement

*On behalf of the Citizens of Baltimore City, the mission of the **Labor and Workforce Committee** is committed to strengthening Baltimore's workforce by championing fair labor practices, equitable job opportunities, and economic mobility for all residents. The committee prioritizes policies that ensure safe and dignified working conditions, uphold workers' rights, and expand access to career pathways through job training and education.*

The Honorable
Jermaine Jones
CHAIR

PUBLIC HEARING

January 14, 2026

2:00 PM
CLARENCE "DU" BURNS COUNCIL CHAMBERS

Bill:25-0116

Title: Security Officers – Compensation

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OFFICE OF COUNCIL SERVICES
NANCY MEAD – DIRECTOR
100 N. HOLIDAY STREET
BALTIMORE MD, 21202

Meeting: Legislative Oversight Hearing
Committee: Labor & Workforce
Bill # 25-0116

Title: Security Officers - Compensation

Purpose: For the purpose of requiring a certain type of employer to provide specified minimum compensation to a certain class of employee; defining certain terms; providing for the effective dates of this Ordinance; providing for the termination of certain provisions of this Ordinance; and generally relating to compensation for security officers.

REPORTING AGENCIES

Agency	Report
Law Department	Approved for Form and Legal Sufficiency
Department of Finance	Opposes
Department of General Services	Without Recommendation
Wage Commission	Not Received
Office of Equity and Civil Rights	Unfavorable

BACKGROUND

Security officers provide access control, monitor activity, and report safety concerns in many of Baltimore's large commercial buildings. Compensation for these workers is determined by individual employers and can vary based on contracting arrangements, building size, and industry standards.

Baltimore City has general authority to set local minimum wage requirements. Several major U.S. cities have policies, ordinances, or industry practices that result in defined wage standards for building service workers, including security officers.

In Washington, D.C., many security officers in commercial office buildings are covered under a citywide collective bargaining agreement negotiated by SEIU 32BJ, which sets standardized wage and benefit rates for building service employees.

New York City has long-standing industrywide labor agreements between building owners and SEIU 32BJ that establish uniform compensation standards for office-building security personnel.

Los Angeles maintains sector-specific wage standards through ordinances applicable to certain building service occupations and city-controlled facilities, including security officers working at sites such as Los Angeles International Airport.

Seattle and Chicago also have labor frameworks, through either municipal labor standards or industry agreements, that create consistent wage expectations for security officers and other building service workers in large commercial buildings.

Because Council Bill 25-0116 would apply a wage standard to one occupational group, the City must be able to show that the classification is reasonably related to a legitimate government interest.

Bill Summary

Council Bill 25-0116 establishes minimum compensation requirements for security officers employed in Baltimore City. The bill creates definitions, sets out a method for determining wages and benefits, and assigns responsibilities to the Wage Commission and covered employers.

Definitions

- "Covered security officers" are defined as individuals employed in Baltimore City to prevent, identify, and report theft, property damage, and disorder at buildings or events.

- Marine guards, ship watchmen, and unarmed employees of bars, taverns, or restaurants are excluded.

- A "covered security employer" is an employer with two or more covered security officers in the city.

The bill establishes two key compensation metrics:

1. The "average per-employee wage rate" for covered security officers working in commercial office buildings of at least 350,000 square feet in Baltimore City.

2. The "average per-employee total benefit rate," which reflects the hourly cost of providing bona fide fringe benefits, including medical care, pensions, unemployment benefits, life insurance, disability insurance, accident insurance, educational programs,

vacation, and holiday pay. Legally required benefits are excluded, except for federal holidays and the supplemental benefit rate required under state labor law.

A covered security officer's compensation may not be less than the higher of two figures. The first figure is the combined value of the minimum wage, health and welfare rate, and paid vacation and holiday rate for the federal Guard 1 classification under the federal Service Contract Act wage determination for Baltimore. The second figure is the combined average per-employee wage rate and average per-employee total benefit rate as defined in this bill.

The Wage Commission is responsible for calculating and publishing the required compensation amount each year. The determination must be made no later than July 1 and takes effect the following January 1 for the full calendar year. The Compensation determination must also be posted on the City's website annually.

Covered security employers are required to pay each covered security officer no less than the compensation amount determined by the Wage Commission. Paying below the required amount constitutes a violation of the Minimum Wage Law.

ADDITIONAL INFORMATION

Fiscal Note:

The minimum wage represents the base hourly pay employers are legally required to provide non-tipped workers. In Maryland, the established minimum wage is $15.00 per hour, which is also the mandatory rate for all businesses in Baltimore City with two or more employees. Although the rate is more than double the federal minimum wage rate of $7.25, the economic realities due to inflation and the cost-of-living leave many minimum wage workers financially insecure.

Effective July 1, 2025, Baltimore's City's contract establishes a minimum pay rate of $18.50 for Security Personnel. However, the purpose of Council Bill 25-0116 aims to establish a standard minimum wage and benefits for security guards for an employer that employs 2 or more security officers within the city. There is no immediate fiscal impact for this Bill since the compensation amount has not been determined, and any change will not be effective until January 1, 2027.

Information Source(s): 25-0116 1st reader and agency reports.

https://www.seiu32bj.org/contract-page/#Tri-State-Contract-Bilingual-2024-20271

https://www.seiu32bj.org/contract-page/#page-1

https://www.chicago.gov/content/dam/city/depts/dcd/ssa/2013SPA/SSA34SPA2013.pdf

https://seattle.gov/laborstandards/ordinances/minimum-wage

https://bca.lacity.gov/Uploads/lwo/Ordinance%2010.15.2018%20Version.pdf

https://civilrights.baltimorecity.gov/wage-commission/wages

https://www.dol.gov/general/topic/wages/minimumwage

https://boesubmit.baltimorecity.gov/Files/cb928d24-f094-41f4-8228-ff5c819c3d1f.pdf

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Analysis by: Juliane Jemmott Direct Inquiries to: (410) 396 - 1268
Analysis Date:12/8/2025

* All Hearings have used the same packet.*

CITY OF BALTIMORE
COUNCIL BILL 25-0116
(First Reader)

Introduced by: Councilmember Jones
Cosponsored by: President Cohen and Councilmembers Dorsey, Conway, Middleton, Torrence, Bullock, Blanchard, Ramos, Gray, Porter, Schleifer, and Glover
Introduced and read first time: November 10, 2025
Assigned to: Labor and Workforce Committee
REFERRED TO THE FOLLOWING AGENCIES: City Solicitor, Department of Finance, Department of General Services, Wage Commission, Office of Equity and Civil Rights

A BILL ENTITLED

AN ORDINANCE concerning

Security Officers – Compensation

FOR the purpose of requiring a certain type of employer to provide specified minimum compensation to a certain class of employee; defining certain terms; providing for the effective dates of this Ordinance; providing for the termination of certain provisions of this Ordinance; and generally relating to compensation for security officers.

BY adding
Article 11 - Labor and Employment
Section 3-9
Baltimore City Code
(Edition 2000)

SECTION 1. BE IT ORDAINED BY THE MAYOR AND CITY COUNCIL OF BALTIMORE, That the Laws of Baltimore City read as follows:

Baltimore City Code

Article 11. Labor and Employment

Division I. Minimum Wage Law

Subtitle 3. Wage Requirements

§ 3-9. SECURITY WORKERS.

(A) *DEFINITIONS.*

(1) *IN GENERAL.*

IN THIS SECTION, THE FOLLOWING TERMS HAVE THE MEANINGS INDICATED.

EXPLANATION: CAPITALS indicate matter added to existing law.
[Brackets] indicate matter deleted from existing law.

(2) *AVERAGE PER-EMPLOYEE TOTAL BENEFIT RATE.*

(I) *IN GENERAL.*

"AVERAGE PER-EMPLOYEE TOTAL BENEFIT RATE" MEANS THE AVERAGE HOURLY COST OF PROVIDING ALL BONA FIDE FRINGE BENEFITS FOR A COVERED SECURITY OFFICER, INCLUDING:

(A) MEDICAL OR HOSPITAL CARE;

(B) A PENSION UPON RETIREMENT OR DEATH;

(C) COMPENSATION FOR INJURIES OR ILLNESS RESULTING FROM OCCUPATIONAL ACTIVITY, OR INSURANCE TO PROVIDE ANY OF THE FOREGOING;

(D) UNEMPLOYMENT BENEFITS;

(E) LIFE INSURANCE;

(F) DISABILITY AND SICKNESS INSURANCE;

(G) ACCIDENT INSURANCE;

(H) THE COST OF AN APPRENTICESHIP OR OTHER SIMILAR EDUCATIONAL PROGRAM; AND

(I) VACATION AND HOLIDAY PAY.

(II) *EXCLUSIONS.*

"AVERAGE PER-EMPLOYEE TOTAL BENEFIT RATE" DOES NOT INCLUDE ALL OTHERWISE LEGALLY-REQUIRED BENEFITS, WITH THE EXCEPTION OF:

(A) FEDERAL HOLIDAYS; AND

(B) THE SUPPLEMENT BENEFIT RATE REQUIRED BY § 3-1604(A)(2)(II) OF THE STATE LABOR AND EMPLOYMENT ARTICLE.

(III) *EMPLOYEES INCLUDED IN CALCULATION.*

"AVERAGE PER-EMPLOYEE TOTAL BENEFIT RATE" IS CALCULATED AS AN AVERAGE AMONG COVERED SECURITY OFFICERS WHO ARE EMPLOYED AT A COMMERCIAL OFFICE BUILDING THAT IS:

(A) 350,000 SQUARE FEET OR MORE; AND

(B) LOCATED IN THE CITY.

(3) *AVERAGE PER-EMPLOYEE WAGE RATE.*

"AVERAGE PER-EMPLOYEE WAGE RATE" MEANS THE AVERAGE WAGE FOR A COVERED SECURITY OFFICER WHO IS EMPLOYED AT A COMMERCIAL OFFICE BUILDING THAT IS:

(I) 350,000 SQUARE FEET OR MORE; AND

(II) LOCATED IN THE CITY.

(4) *COMPENSATION.*

"COMPENSATION" MEANS ANY COMBINATION OF WAGES, BENEFITS, AND PAID TIME OFF.

(5) *COVERED SECURITY OFFICER.*

(I) *IN GENERAL.*

"COVERED SECURITY OFFICER" MEANS ANY INDIVIDUAL EMPLOYED IN BALTIMORE CITY TO DO ANY OF THE FOLLOWING:

(A) PREVENT AND IDENTIFY AND REPORT THE THEFT, MISAPPROPRIATION, OR CONCEALMENT OF GOODS, WARES, MERCHANDISE, MONEY, BONDS, STOCK CERTIFICATES, OR OTHER VALUABLE DOCUMENTS, PAPERS, AND ITEMS;

(B) PREVENT AND IDENTIFY AND REPORT THE DAMAGE TO, INTRUSION UPON, OR THEFT OF REAL OR PERSONAL PROPERTY; AND

(C) PREVENT AND IDENTIFY AND REPORT ASSAULTS, GATE-CRASHING, OR OTHER DISORDERS AT MEETINGS, EVENTS, OR PERFORMANCES.

(II) *EXCLUSIONS.*

"COVERED SECURITY OFFICER" DOES NOT INCLUDE:

(A) A MARINE GUARD OR SHIP WATCHMAN, REGARDLESS OF WHETHER THE GUARD OR WATCHMAN IS STATIONED ABOARD A SHIP OR ON A PIER; OR

(B) AN UNARMED EMPLOYEE OF A BAR, TAVERN, OR RESTAURANT.

(6) *COVERED SECURITY EMPLOYER.*

"COVERED SECURITY EMPLOYER" MEANS AN EMPLOYER THAT EMPLOYS 2 OR MORE COVERED SECURITY OFFICERS WITHIN THE CITY.

(B) *COMPENSATION DETERMINATION.*

(1) *IN GENERAL.*

THE COMPENSATION AMOUNT FOR A COVERED SECURITY OFFICER IN THE CITY MAY NOT BE LESS THAN THE HIGHER OF:

(I) FOR THE GUARD 1 CLASSIFICATION ESTABLISHED BY THE UNITED STATES SECRETARY OF LABOR PURSUANT TO CHAPTER 67 OF 41 U.S.C. § 6701 ET SEQ., AS AMENDED, THE COMBINED VALUE OF THE MINIMUM WAGE RATE, HEALTH AND WELFARE RATE, AND PAID VACATION AND HOLIDAYS RATES SET FORTH IN THE LOCALITY WAGE DETERMINATION ISSUED BY THE ADMINISTRATOR OF THE WAGE AND HOUR DIVISION OF THE EMPLOYMENT STANDARDS DIVISION OF THE U.S. DEPARTMENT OF LABOR FOR THE AREA THAT INCLUDES THE CITY; OR

(II) THE COMBINED VALUE OF:

(A) THE AVERAGE PER-EMPLOYEE WAGE RATE; AND

(B) THE AVERAGE PER-EMPLOYEE TOTAL BENEFIT RATE.

(2) *DETERMINATION BY WAGE COMMISSION.*

THE WAGE COMMISSION SHALL ANNUALLY DETERMINE THE COMPENSATION AMOUNT REQUIRED UNDER PARAGRAPH (1) OF THIS SUBSECTION BY JULY 1 OF EACH YEAR.

(3) *EFFECTIVE DATE.*

THE COMPENSATION AMOUNT ESTABLISHED UNDER THIS SUBSECTION SHALL BE EFFECTIVE THE FOLLOWING YEAR FROM JANUARY 1 THROUGH DECEMBER 31.

(C) *POSTING REQUIREMENT.*

THE WAGE COMMISSION SHALL POST THE DETERMINATION MADE UNDER SUBSECTION (B) OF THIS SECTION ON THE CITY'S WEBSITE NO LATER THAN JULY 1 OF EACH YEAR.

SECTION 2. AND BE IT FURTHER ORDAINED, That the Laws of Baltimore City read as follows:

Baltimore City Code

Article 11. Labor and Employment

Division I. Minimum Wage Law

Subtitle 3. Wage Requirements

§ 3-9. SECURITY WORKERS.

(A) *DEFINITIONS.*

(1) *IN GENERAL.*

IN THIS SECTION, THE FOLLOWING TERMS HAVE THE MEANINGS INDICATED.

(2) *AVERAGE PER-EMPLOYEE TOTAL BENEFIT RATE.*

(I) *IN GENERAL.*

"AVERAGE PER-EMPLOYEE TOTAL BENEFIT RATE" MEANS THE AVERAGE HOURLY COST OF PROVIDING ALL BONA FIDE FRINGE BENEFITS FOR A COVERED SECURITY OFFICER, INCLUDING:

(A) MEDICAL OR HOSPITAL CARE;

(B) A PENSION UPON RETIREMENT OR DEATH;

(C) COMPENSATION FOR INJURIES OR ILLNESS RESULTING FROM OCCUPATIONAL ACTIVITY, OR INSURANCE TO PROVIDE ANY OF THE FOREGOING;

(D) UNEMPLOYMENT BENEFITS;

(E) LIFE INSURANCE;

(F) DISABILITY AND SICKNESS INSURANCE;

(G) ACCIDENT INSURANCE;

(H) THE COST OF AN APPRENTICESHIP OR OTHER SIMILAR EDUCATIONAL PROGRAM; AND

(I) VACATION AND HOLIDAY PAY.

(II) *EXCLUSIONS.*

"AVERAGE PER-EMPLOYEE TOTAL BENEFIT RATE" DOES NOT INCLUDE ALL OTHERWISE LEGALLY-REQUIRED BENEFITS, WITH THE EXCEPTION OF:

(A) FEDERAL HOLIDAYS; AND

(B) THE SUPPLEMENT BENEFIT RATE REQUIRED BY § 3-1604(A)(2)(II) OF THE STATE LABOR AND EMPLOYMENT ARTICLE.

(III) *EMPLOYEES INCLUDED IN CALCULATION.*

"AVERAGE PER-EMPLOYEE TOTAL BENEFIT RATE" IS CALCULATED AS AN AVERAGE AMONG COVERED SECURITY OFFICERS WHO ARE EMPLOYED AT A COMMERCIAL OFFICE BUILDING THAT IS:

(A) 350,000 SQUARE FEET OR MORE; AND

(B) LOCATED IN THE CITY.

(3) *AVERAGE PER-EMPLOYEE WAGE RATE.*

"AVERAGE PER-EMPLOYEE WAGE RATE" MEANS THE AVERAGE WAGE FOR A COVERED SECURITY OFFICER WHO IS EMPLOYED AT A COMMERCIAL OFFICE BUILDING THAT IS:

(I) 350,000 SQUARE FEET OR MORE; AND

(II) LOCATED IN THE CITY.

(4) *COMPENSATION.*

"COMPENSATION" MEANS ANY COMBINATION OF WAGES, BENEFITS, AND PAID TIME OFF.

(5) *COVERED SECURITY OFFICER.*

(I) *IN GENERAL.*

"COVERED SECURITY OFFICER" MEANS ANY INDIVIDUAL EMPLOYED IN BALTIMORE CITY TO DO ANY OF THE FOLLOWING:

(A) PREVENT AND IDENTIFY AND REPORT THE THEFT, MISAPPROPRIATION, OR CONCEALMENT OF GOODS, WARES, MERCHANDISE, MONEY, BONDS, STOCK CERTIFICATES, OR OTHER VALUABLE DOCUMENTS, PAPERS, AND ITEMS;

(B) PREVENT AND IDENTIFY AND REPORT THE DAMAGE TO, INTRUSION UPON, OR THEFT OF REAL OR PERSONAL PROPERTY; AND

(C) PREVENT AND IDENTIFY AND REPORT ASSAULTS, GATE-CRASHING, OR OTHER DISORDERS AT MEETINGS, EVENTS, OR PERFORMANCES.

(II) *EXCLUSIONS.*

"COVERED SECURITY OFFICER" DOES NOT INCLUDE:

(A) A MARINE GUARD OR SHIP WATCHMAN, REGARDLESS OF WHETHER THE GUARD OR WATCHMAN IS STATIONED ABOARD A SHIP OR ON A PIER; OR

(B) AN UNARMED EMPLOYEE OF A BAR, TAVERN, OR RESTAURANT.

(6) *COVERED SECURITY EMPLOYER.*

"COVERED SECURITY EMPLOYER" MEANS AN EMPLOYER THAT EMPLOYS 2 OR MORE COVERED SECURITY OFFICERS WITHIN THE CITY.

(B) *COMPENSATION DETERMINATION.*

(1) *IN GENERAL.*

THE COMPENSATION AMOUNT FOR A COVERED SECURITY OFFICER IN THE CITY MAY NOT BE LESS THAN THE HIGHER OF:

(I) FOR THE GUARD 1 CLASSIFICATION ESTABLISHED BY THE UNITED STATES SECRETARY OF LABOR PURSUANT TO CHAPTER 67 OF 41 U.S.C. § 6701 ET SEQ., AS AMENDED, THE COMBINED VALUE OF THE MINIMUM WAGE RATE, HEALTH AND WELFARE RATE, AND PAID VACATION AND HOLIDAYS RATES SET FORTH IN THE LOCALITY WAGE DETERMINATION ISSUED BY THE ADMINISTRATOR OF THE WAGE AND HOUR DIVISION OF THE EMPLOYMENT STANDARDS DIVISION OF THE U.S. DEPARTMENT OF LABOR FOR THE AREA THAT INCLUDES THE CITY; OR

(II) THE COMBINED VALUE OF:

(A) THE AVERAGE PER-EMPLOYEE WAGE RATE; AND

(B) THE AVERAGE PER-EMPLOYEE TOTAL BENEFIT RATE.

(2) *DETERMINATION BY WAGE COMMISSION.*

THE WAGE COMMISSION SHALL ANNUALLY DETERMINE THE COMPENSATION AMOUNT REQUIRED UNDER PARAGRAPH (1) OF THIS SUBSECTION BY JULY 1 OF EACH YEAR.

(3) *EFFECTIVE DATE.*

THE COMPENSATION AMOUNT ESTABLISHED UNDER THIS SUBSECTION SHALL BE EFFECTIVE THE FOLLOWING YEAR FROM JANUARY 1 THROUGH DECEMBER 31.

(C) *POSTING REQUIREMENT.*

THE WAGE COMMISSION SHALL POST THE DETERMINATION MADE UNDER SUBSECTION (B) OF THIS SECTION ON THE CITY'S WEBSITE NO LATER THAN JULY 1 OF EACH YEAR.

(D) *COVERED SECURITY EMPLOYER REQUIREMENT.*

SUBJECT TO THE OTHER PROVISIONS OF THIS DIVISION I, A COVERED SECURITY EMPLOYER SHALL, AT A MINIMUM, PAY EACH COVERED SECURITY OFFICER THE COMPENSATION AMOUNT DETERMINED BY THE WAGE COMMISSION UNDER SUBSECTION (B) OF THIS SECTION.

(E) *VIOLATION.*

IT IS A VIOLATION OF THIS DIVISION I FOR A COVERED SECURITY EMPLOYER TO PAY A COVERED SECURITY OFFICER LESS THAN THE COMPENSATION AMOUNT REQUIRED BY THIS SECTION.

SECTION 3. AND BE IT FURTHER ORDAINED, That Section 1 of this Ordinance shall take effect on the date it is enacted. It shall remain effective until the end of December 31, 2026, at which time, with no further action required by the City Council, Section 1 of this Ordinance shall be abrogated and of no further force and effect.

SECTION 4. AND BE IT FURTHER ORDAINED, That the compensation amount determined under Section 1 of this Ordinance by the Wage Commission as of July 1, 2026, shall be effective the following year from January 1, 2027 through December 31, 2027.

SECTION 5. AND BE IT FURTHER ORDAINED, That, except as provided in Section 3 and Section 4 of this Ordinance, this Ordinance shall take effect January 1, 2027.

AMENDMENTS TO COUNCIL BILL 25-0116
(1st Reader Copy)

By: Councilmember Jones
{To be offered to the Labor and Workforce Committee}

Amendment No. 1

On page 1, in line 2, strike "**Officers**" and substitute "**Guards**"; and, on that same page, in line 6, strike "officers." and substitute "guards."; and, on that same page, in line 18, strike "**WORKERS.**" and substitute "**GUARDS.**"; and, on page 3, in line 9, strike "*OFFICER.*" and substitute "*GUARD.*"; and, on that same page, in line 21, strike "OFFICER"" and substitute "GUARD""; and, on page 4, in line 3, strike "OFFICER" and substitute "GUARD"; and, on page 5, in line 5, strike "**WORKERS.**" and substitute "**GUARDS.**"; and, on that same page, in line 13, strike "OFFICER," and substitute "GUARD,"; and, on page 6, in line 5, strike "OFFICERS" and substitute "GUARDS"; and, on that same page, in line 11, strike "OFFICER" and substitute "GUARD"; and, on that same page, in line 17, strike "*OFFICER.*" and substitute "*GUARD.*"; and, on that same page, in line 29, strike "OFFICER"" and substitute "GUARD""; and, on page 7, in lines 7 and 31, in each instance, strike "OFFICER" and substitute "GUARD"; and, on page 8, in line 3, strike "OFFICER" and substitute "GUARD".

Amendment No. 2

Strike beginning with line 1 on page 2 down throught and including line 5 on page 3; and, on page 3, in lines 6, 9, and 25, respectively, strike "(4)", "(5)", and "(6)", respectively, and substitute "(2)", "(3)", and "(4)", respectively; and, on page 4, strike beginning with "THAN" in line 4 down through and including "(I)" in line 5 and substitute "THAN,"; and, on that same page, in line 12, strike "CITY; OR" and substitute "CITY."; and, on that same page, strike in their entireties lines 13 through 15.

Amendment No. 3

On page 3, strike in their entireties lines 11 through 19 and substitute:

"""COVERED SECURITY GUARD" MEANS ANY INDIVIDUAL EMPLOYED IN BALTIMORE CITY BY A COVERED SECURITY EMPLOYER WHO PRINCIPALLY PERFORMS 1 OR MORE OF THE FOLLOWING FUNCTIONS:

(A) PROTECTS INDIVIDUALS OR PROPERTY FROM HARM, THEFT, OR OTHER UNLAWFUL ACTIVITY;

(B) DETERS, OBSERVES, DETECTS, OR REPORTS INCIDENTS IN ORDER TO PREVENT ANY UNLAWFUL OR UNAUTHORIZED ACTIVITY, INCLUDING UNLAWFUL OR UNAUTHORIZED INTRUSION OR ENTRY, LARCENY, VANDALISM, ABUSE, ARSON, OR TRESPASS ON PROPERTY; OR

(C) RESPONDS TO A TRIGGERED SECURITY SYSTEM ALARM IN ORDER TO PREVENT OR DETECT UNAUTHORIZED INTRUSION, ROBBERY, BURGLARY, THEFT, PILFERAGE, AND OTHER LOSSES OR TO MAINTAIN SECURITY OF A PROTECTED PREMISES.";

and, on that same page, strike in their entireties lines 26 and 27 and substitute:

"""COVERED SECURITY EMPLOYER" MEANS ANY PERSON, FIRM, LIMITED LIABILITY COMPANY, CORPORATION, PUBLIC ENTITY OR SUBSIDIARY OR DEPARTMENT OF SUCH FIRM, LIMITED LIABILITY COMPANY, CORPORATION, OR PUBLIC ENTITY EMPLOYING 2 OR MORE COVERED SECURITY GUARDS OR INDIVIDUALS BEING SELF-EMPLOYED AS A SECURITY GUARD ON EITHER A PROPRIETARY BASIS FOR ITS OWN USE OR ON A CONTRACTUAL BASIS FOR USE BY ANOTHER PERSON, FIRM, LIMITED LIABILITY COMPANY, CORPORATION, PUBLIC ENTITY OR SUBSIDIARY THEREOF WITHIN THE CITY."; and

on page 6, strike in their entireties lines 19 through 27 and substitute:

"""COVERED SECURITY GUARD" MEANS ANY INDIVIDUAL EMPLOYED IN BALTIMORE CITY BY A COVERED SECURITY EMPLOYER WHO PRINCIPALLY PERFORMS 1 OR MORE OF THE FOLLOWING FUNCTIONS:

(A) PROTECTS INDIVIDUALS OR PROPERTY FROM HARM, THEFT, OR OTHER UNLAWFUL ACTIVITY;

(B) DETERS, OBSERVES, DETECTS, OR REPORTS INCIDENTS IN ORDER TO PREVENT ANY UNLAWFUL OR UNAUTHORIZED ACTIVITY, INCLUDING UNLAWFUL OR UNAUTHORIZED INTRUSION OR ENTRY, LARCENY, VANDALISM, ABUSE, ARSON, OR TRESPASS ON PROPERTY; OR

(C) RESPONDS TO A TRIGGERED SECURITY SYSTEM ALARM IN ORDER TO PREVENT OR DETECT UNAUTHORIZED INTRUSION, ROBBERY, BURGLARY, THEFT, PILFERAGE, AND OTHER LOSSES OR TO MAINTAIN SECURITY OF A PROTECTED PREMISES.";

and, on page 7, strike in their entireties lines 3 and 4 and substitute:

""COVERED SECURITY EMPLOYER" MEANS ANY PERSON, FIRM, LIMITED LIABILITY COMPANY, CORPORATION, PUBLIC ENTITY OR SUBSIDIARY OR DEPARTMENT OF SUCH FIRM, LIMITED LIABILITY COMPANY, CORPORATION, OR PUBLIC ENTITY EMPLOYING 2 OR MORE COVERED SECURITY GUARDS OR INDIVIDUALS BEING SELF-EMPLOYED AS A SECURITY GUARD ON EITHER A PROPRIETARY BASIS FOR ITS OWN USE OR ON A CONTRACTUAL BASIS FOR USE BY ANOTHER PERSON, FIRM, LIMITED LIABILITY COMPANY, CORPORATION, PUBLIC ENTITY OR SUBSIDIARY THEREOF WITHIN THE CITY.".

Amendment No. 4

On page 3, after line 27, insert:

"(5) *MINIMUM COMPENSATION.*

(I) *IN GENERAL.*

"MINIMUM COMPENSATION" MEANS THE COMPENSATION AMOUNT A COVERED SECURITY EMPLOYER IS REQUIRED TO PAY TO A COVERED SECURITY GUARD PURSUANT TO THIS SECTION.

(II) *EXCLUSIONS.*

"MINIMUM COMPENSATION" DOES NOT INCLUDE ALL OTHERWISE LEGALLY-REQUIRED BENEFITS, WITH THE EXCEPTION OF:

(A) FEDERAL HOLIDAYS; AND

(B) THE SUPPLEMENT BENEFIT RATE REQUIRED BY § 3-1604(A)(2)(II) OF THE STATE LABOR AND EMPLOYMENT ARTICLE.";

and, on page 4, in line 1, strike "*COMPENSATION*" and substitute "*MINIMUM COMPENSATION*"; and, on that same page, in line 3, after the first instance of "THE" insert "MINIMUM"; and, on that same page, in line 17, after the second instance of "THE" insert "MINIMUM"; and, on that same page, in line 20, after "THE" insert "MINIMUM"; and, on that same page, in line 23, after the second instance of "THE" insert "MINIMUM COMPENSATION"; and, on page 7, after line 4, insert:

"(7) *MINIMUM COMPENSATION.*

(I) *IN GENERAL.*

"MINIMUM COMPENSATION" MEANS THE COMPENSATION AMOUNT A COVERED SECURITY EMPLOYER IS REQUIRED TO PAY TO A COVERED SECURITY GUARD PURSUANT TO THIS SECTION.

(II) *EXCLUSIONS.*

"MINIMUM COMPENSATION" DOES NOT INCLUDE ALL OTHERWISE LEGALLY-REQUIRED BENEFITS, WITH THE EXCEPTION OF:

(A) FEDERAL HOLIDAYS; AND

(B) THE SUPPLEMENT BENEFIT RATE REQUIRED BY § 3-1604(A)(2)(II) OF THE STATE LABOR AND EMPLOYMENT ARTICLE.";

and, on that same page, in line 5, strike "*COMPENSATION*" and substitute "*MINIMUM COMPENSATION*"; and, on that same page, in line 7, after the first instance of "THE" insert "MINIMUM"; and, on that same page, in line 21, after the second instance of "THE" insert "MINIMUM";and, on that same page, in line 24, after "THE" insert "MINIMUM"; and, on that same page, in line 27, after the second instance of "THE" insert "MINIMUM COMPENSATION"; and, on that same page, in line 31, after "THE" insert "MINIMUM"; and, on page 8, in line 3, after "THE" insert "MINIMUM"; and, on that same page, in line 9, after "the" insert "minimum".

Amendment No. 5

On page 4, in line 17, strike "COMMISSION" and substitute "COMMISSION, WITH THE ASSISTANCE OF THE OFFICE OF EQUITY AND CIVIL RIGHTS,"; and, on that same page, in line 23, strike "WAGE COMMISSION" and substitute "OFFICE OF EQUITY AND CIVIL RIGHTS"; and, on page 7, in line 21, strike "COMMISSION" and substitute "COMMISSION, WITH THE ASSISTANCE OF THE OFFICE OF EQUITY AND CIVIL RIGHTS,"; and, on that same page, in line 27, strike "WAGE COMMISSION" and substitute "OFFICE OF EQUITY AND CIVIL RIGHTS".

Amendment No. 6

On page 6, in lines 5 and 6, strike "AT A COMMERCIAL OFFICE BUILDING THAT IS:" and substitute "IN THE CITY."; and, on that same page, strike in their entireties lines 7 and 8; and, on that same page, in line 11, strike "AT A COMMERCIAL OFFICE BUILDING THAT IS:" and substitute "IN THE CITY."; and, on that same page, strike in their entireties lines 12 and 13.

Amendment No. 7

On page 8, after line 4, insert:

"(F) *EMPLOYER TO DISPLAY.*

(1) *IN GENERAL.*

UPON THE TAKING EFFECT OF THE COMPENSATION DETERMINATION UNDER THIS SECTION, A COVERED SECURITY EMPLOYER SHALL POST A SIGN, MEASURING AT LEAST 3 BY 5 INCHES IN SIZE, THAT INCLUDES:

(I) THE REQUIRED COMPENSATION AMOUNT;

(II) A CITATION OF THE APPLICABLE SECTIONS OF CITY CODE; AND

(III) THE CONTACT INFORMATION FOR THE WAGE COMMISSION.

(2) *LOCATION.*

THE COVERED SECURITY EMPLOYER SHALL POST THE SIGN REQUIRED UNDER THIS SUBSECTION:

(I) IN CLEAR VIEW OF EMPLOYEES; AND

(II) WHERE SIMILAR NOTICES ARE CUSTOMARILY POSTED.

(3) *OECR TO POST.*

THE OFFICE OF EQUITY AND CIVIL RIGHTS SHALL COMPILE AND POST ON THE CITY'S WEBSITE A PRINTABLE VERSION OF THE SIGN REQUIRED UNDER THIS SUBSECTION.".

Amendment No. 8

On page 8, after line 4, insert:

"(G) *ANNUAL REPORT.*

ON OR BEFORE JULY 1 OF EACH YEAR, THE OFFICE OF EQUITY AND CIVIL RIGHTS SHALL SUBMIT A REPORT TO THE MAYOR AND CITY COUNCIL THAT INCLUDES:

(I) THE NEWLY-DETERMINED AVERAGE PER-EMPLOYEE TOTAL BENEFIT RATE; AND

(II) THE NEWLY-DETERMINED AVERAGE PER-EMPLOYEE WAGE RATE.".

Amendment No. 9

On page 8, before line 5, insert:

"**SECTION 3. AND BE IT FURTHER ORDAINED**, That the Laws of Baltimore City read as follows:

Baltimore City Code

Article 11. Labor and Employment

Division I. Minimum Wage Law

Subtitle 3. Wage Requirements

§ 3-9. SECURITY GUARDS.

(A) *DEFINITIONS.*

(1) *IN GENERAL.*

IN THIS SECTION, THE FOLLOWING TERMS HAVE THE MEANINGS INDICATED.

(2) *COMPENSATION.*

"COMPENSATION" MEANS ANY COMBINATION OF WAGES, BENEFITS, AND PAID TIME OFF.

(3) *COVERED SECURITY GUARD.*

(I) *IN GENERAL.*

"COVERED SECURITY GUARD" MEANS ANY INDIVIDUAL EMPLOYED IN BALTIMORE CITY BY A COVERED SECURITY EMPLOYER WHO PRINCIPALLY PERFORMS 1 OR MORE OF THE FOLLOWING FUNCTIONS:

(A) PROTECTS INDIVIDUALS OR PROPERTY FROM HARM, THEFT, OR OTHER UNLAWFUL ACTIVITY;

(B) DETERS, OBSERVES, DETECTS, OR REPORTS INCIDENTS IN ORDER TO PREVENT ANY UNLAWFUL OR UNAUTHORIZED ACTIVITY, INCLUDING UNLAWFUL OR UNAUTHORIZED INTRUSION OR ENTRY, LARCENY, VANDALISM, ABUSE, ARSON, OR TRESPASS ON PROPERTY; OR

(C) RESPONDS TO A TRIGGERED SECURITY SYSTEM ALARM IN ORDER TO PREVENT OR DETECT UNAUTHORIZED INTRUSION, ROBBERY, BURGLARY, THEFT, PILFERAGE, AND OTHER LOSSES OR TO MAINTAIN SECURITY OF A PROTECTED PREMISES.

(II) *EXCLUSIONS.*

"COVERED SECURITY GUARD" DOES NOT INCLUDE:

(A) A MARINE GUARD OR SHIP WATCHMAN, REGARDLESS OF WHETHER THE GUARD OR WATCHMAN IS STATIONED ABOARD A SHIP OR ON A PIER; OR

(B) AN UNARMED EMPLOYEE OF A BAR, TAVERN, OR RESTAURANT.

(4) *COVERED SECURITY EMPLOYER.*

"COVERED SECURITY EMPLOYER" MEANS ANY PERSON, FIRM, LIMITED LIABILITY COMPANY, CORPORATION, PUBLIC ENTITY OR SUBSIDIARY OR DEPARTMENT OF SUCH FIRM, LIMITED LIABILITY COMPANY, CORPORATION, OR PUBLIC ENTITY EMPLOYING 2 OR MORE COVERED SECURITY GUARDS OR INDIVIDUALS BEING SELF-EMPLOYED AS A SECURITY GUARD ON EITHER A PROPRIETARY BASIS FOR ITS OWN USE OR ON A CONTRACTUAL BASIS FOR USE BY ANOTHER PERSON, FIRM, LIMITED LIABILITY COMPANY, CORPORATION, PUBLIC ENTITY OR SUBSIDIARY THEREOF WITHIN THE CITY.

(5) *MINIMUM COMPENSATION.*

(I) *IN GENERAL.*

"MINIMUM COMPENSATION" MEANS THE COMPENSATION AMOUNT A COVERED SECURITY EMPLOYER IS REQUIRED TO PAY TO A COVERED SECURITY GUARD PURSUANT TO THIS SECTION.

(II) *EXCLUSIONS.*

"MINIMUM COMPENSATION" DOES NOT INCLUDE ALL OTHERWISE LEGALLY-REQUIRED BENEFITS, WITH THE EXCEPTION OF:

(A) FEDERAL HOLIDAYS; AND

(B) THE SUPPLEMENT BENEFIT RATE REQUIRED BY § 3-1604(A)(2)(II) OF THE STATE LABOR AND EMPLOYMENT ARTICLE.

(B) *MINIMUM COMPENSATION DETERMINATION.*

(1) *IN GENERAL.*

THE MINIMUM COMPENSATION AMOUNT FOR A COVERED SECURITY GUARD IN THE CITY MAY NOT BE LESS THAN, FOR THE GUARD 1 CLASSIFICATION ESTABLISHED BY THE UNITED STATES SECRETARY OF LABOR PURSUANT TO CHAPTER 67 OF 41 U.S.C. § 6701 ET SEQ., AS AMENDED, THE COMBINED VALUE OF THE MINIMUM WAGE RATE, HEALTH AND WELFARE RATE, AND PAID VACATION AND HOLIDAYS RATES SET FORTH IN THE LOCALITY WAGE DETERMINATION ISSUED BY THE ADMINISTRATOR OF THE WAGE AND HOUR DIVISION OF THE EMPLOYMENT STANDARDS DIVISION OF THE U.S. DEPARTMENT OF LABOR FOR THE AREA THAT INCLUDES THE CITY.

(2) *DETERMINATION BY WAGE COMMISSION.*

THE WAGE COMMISSION, WITH THE ASSISTANCE OF THE OFFICE OF EQUITY AND CIVIL RIGHTS, SHALL ANNUALLY DETERMINE THE MINIMUM COMPENSATION AMOUNT REQUIRED UNDER PARAGRAPH (1) OF THIS SUBSECTION BY JULY 1 OF EACH YEAR.

(3) *EFFECTIVE DATE.*

THE MINIMUM COMPENSATION AMOUNT ESTABLISHED UNDER THIS SUBSECTION SHALL BE EFFECTIVE THE FOLLOWING YEAR FROM JANUARY 1 THROUGH DECEMBER 31.

(C) *POSTING REQUIREMENT.*

THE OFFICE OF EQUITY AND CIVIL RIGHTS SHALL POST THE MINIMUM COMPENSATION DETERMINATION MADE UNDER SUBSECTION (B) OF THIS SECTION ON THE CITY'S WEBSITE NO LATER THAN JULY 1 OF EACH YEAR.

(D) *COVERED SECURITY EMPLOYER REQUIREMENT.*

SUBJECT TO THE OTHER PROVISIONS OF THIS DIVISION I, A COVERED SECURITY EMPLOYER SHALL, AT A MINIMUM, PAY EACH COVERED SECURITY GUARD THE MINIMUM COMPENSATION AMOUNT DETERMINED BY THE WAGE COMMISSION UNDER SUBSECTION (B) OF THIS SECTION.

(E) *VIOLATION.*

IT IS A VIOLATION OF THIS DIVISION I FOR A COVERED SECURITY EMPLOYER TO PAY A COVERED SECURITY GUARD LESS THAN THE MINIMUM COMPENSATION AMOUNT REQUIRED BY THIS SECTION.

(F) *EMPLOYER TO DISPLAY.*

(1) *IN GENERAL.*

UPON THE TAKING EFFECT OF THE COMPENSATION DETERMINATION UNDER THIS SECTION, A COVERED SECURITY EMPLOYER SHALL POST A SIGN, MEASURING AT LEAST 3 BY 5 INCHES IN SIZE, THAT INCLUDES:

(I) THE REQUIRED COMPENSATION AMOUNT;

(II) A CITATION OF THE APPLICABLE SECTIONS OF CITY CODE; AND

(III) THE CONTACT INFORMATION FOR THE WAGE COMMISSION.

(2) *LOCATION.*

THE COVERED SECURITY EMPLOYER SHALL POST THE SIGN REQUIRED UNDER THIS SUBSECTION:

(I) IN CLEAR VIEW OF EMPLOYEES; AND

(II) WHERE SIMILAR NOTICES ARE CUSTOMARILY POSTED.

(3) *OECR TO POST.*

THE OFFICE OF EQUITY AND CIVIL RIGHTS SHALL COMPILE AND POST ON THE CITY'S WEBSITE A PRINTABLE VERSION OF THE SIGN REQUIRED UNDER THIS SUBSECTION.";

and, on page 8, in lines 5 and 9, respectively, strike "**3.**" and "**4.**", respectively, and substitute "**4.**" and "**5.**", respectively; and, on that same page, after line 11, insert:

"**SECTION 6. AND BE IT FURTHER ORDAINED**, That, Section 2 of this Ordinance shall take effect on January 1, 2027. It shall remain effective until the end of December 31, 2031, at which time, with no futher action required by the City Council, Section 2 of this Ordinance shall be abrogated and of no further force and effect.

SECTION 7. AND BE IT FURTHER ORDAINED, That, the minimum compensation amount determined under Section 2 of this Ordinance by the Wage Commission as of July 1, 2031, shall be effective the following year from January 1, 2032 through December 31, 2032.";

and, on that same page, in line 12, strike "**5.**" and substitute "**8.**"; and, on that same page, in lines 12 and 13, strike "3 and Section 4" and substitute "4, Section 5, Section 6, and Section 7,"; and, on that same page, in line 13, strike "2027." and substitute "2032.".

Baltimore City Council

Labor & Workforce

Committee

Bill: 25-0116

Title: Security Officers – Compensation

Agency Reports

CITY OF BALTIMORE

BRANDON M. SCOTT
Mayor

DEPARTMENT OF LAW
EBONY THOMPSON
CITY SOLICITOR
100 N. HOLLIDAY STREET
SUITE 101, CITY HALL
BALTIMORE, MD 21202

November 18, 2025

The Honorable President and Members
of the Baltimore City Council
Room 409, City Hall
100 N. Holliday Street
Baltimore, Maryland 21202

Re: City Council Bill 25-0116 – Security Officers – Compensation

Dear President and City Council Members:

The Law Department has reviewed City Council Bill 25-0116 for form and legal sufficiency. The bill would: establish a minimum wage for covered security officers employed in the City; require the Wage Commission to determine and publish that minimum wage annually based upon a specific formula; require employers who employ two or more covered security officers in the City to pay those workers no less than that minimum wage; and make failure to pay that minimum wage a violation of Division I of Article 11 of the City Code.

As a general matter, the City's police power extends to establishing a local minimum wage. *See Mayor and City Council v. Sitnick*, 254 Md. 303, 309-10 (1969). This bill establishes a minimum wage for only one class of workers, *i.e.*, certain security officers, so it would need to comply with constitutional equal protection requirements. If there is a rational basis for mandating a higher minimum wage for certain security workers than other workers—as well as for excluding certain security workers from the higher wage—then the disparate treatment is permissible so long as it is related to a legitimate government interest. *See, e.g., Mgmt. Corp. v. Baltimore Cnty*., 104 Md. App. 234, 243 (1995) (where there is no "infringement of a fundamental right or discrimination against a suspect class, we review the Council's actions under the rational basis test"); *Id.* at 244 (explaining that under the rational basis test, a law's disparate treatment of similarly situated parties may pass constitutional muster if that disparate treatment bears a rational relationship to legitimate government interests).

Assuming the City has a legitimate government interest in classifying certain security officers differently than other similarly situated workers, and that the classification is related to a legitimate government interest, the Law Department can approve the bill for form and legal sufficiency.

Sincerely,

Jeffrey Hochstetler
Chief Solicitor

cc: Ebony Thompson, Acting City Solicitor
Ty'lor Schnella, Mayor's Office of Government Relations
Hilary Ruley, Chief Solicitor, General Counsel Division
Ashlea Brown, Chief Solicitor
Michelle Toth, Assistant Solicitor
Desireé Luckey, Assistant Solicitor

CITY OF BALTIMORE
MAYOR BRANDON M. SCOTT

TO	The Honorable President and Members of the Baltimore City Council
FROM	Laura Larsen, Budget Director
DATE	December 9th, 2025
SUBJECT	City Council Bill 25-0116, Security Officers – Compensation

Position: Opposes

The Department of Finance is herein reporting on City Council Bill 25-0116, Security Officers – Compensation, the purpose of which is requiring a certain type of employers to provide specified minimum compensation to a certain class of employee; defining certain terms; providing for the effective dates of this Ordinance; providing for the termination of certain provisions of this Ordinance; and generally relating to compensation for security officers.

Background
The City Council has not recently worked on legislation that deals with specifically with security officer pay. However, there have been a number of other pieces of legislation that deal with increasing wages in the City, changing the way that the City calculates wages, applying the prevailing wage to City funded projects, and contract worker retention.

Bill #	Title	Status	Bill's Goal
17-0018	Labor and Employment - City Minimum Wage	Vetoed by Mayor	Would increase the minimum wage to $15 an hour.
17-0048	Labor and Employment - Displaced Service Workers Protection	Enacted	This provision protects displaced service workers by requiring their retention under certain contract transitions, ensuring transparency, prohibiting retaliation, and empowering the Wage Commission to enforce compliance.
18-0297	Prevailing Wages - Tax Increment Financing Projects	Enacted	Extends the existing prevailing wage requirement to projects receiving funds from TIFs.
20-0629	Prevailing Wage - Determination	Failed	Simplifies the process by which the City calculates its prevailing wage, and establishes a review process.
22-0249	Prevailing Wage - Revisions and Petitions	Failed - End of Term	Simplifies the process by which the City calculates its prevailing wage, and establishes a review process.

24-0556	Fair Wages for Tipped Employees	Failed - End of Term	Would bring the tipped wage up to the minimum wage.
25-0058	Fair Wages for Tipped Employees	In Committee	Would bring the tipped wage up to the minimum wage.

City Council Bill 25-0116
Council Bill 25-0116 establishes minimum compensation standards for security officers working in Baltimore City. The bill requires certain employers to pay security officers at least a defined combination of wages and benefits. Each year, the Wage Commission must determine the higher of the following: (1) the total compensation (wages, health and welfare benefits, and paid vacation/holidays) listed in the federal Department of Labor's "Guard 1" wage determination for the Baltimore area, or (2) the combined average wage rate and average total benefit rate paid to security officers. This is found by examining the wages of security officers positioned at buildings that are 350,000 square feet or more. The higher of these two amounts becomes the required minimum compensation. The Wage Commission must publish this determination annually by July 1 of each year.

Fiscal Impact
This legislation is estimated to result in approximately $820,000 of recurring costs for the City. The primary drivers of the increase come from the existing security contract utilized by DGS and additional staff needed to implement the legislation. This section summarizes our cost projections.

Security Cost Estimates
The City utilizes external security contracts for various City buildings through a contract managed by the Department of General Services (DGS). Most recently, DGS has utilized a contract with Abacus to provide security services. Under the contract, the City pays Abacus for 6,565 hours of security officer coverage per week. Abacus is permitted to charge one supervisory hour for every 16 hours worked by a nonsupervisory security officer. There is a flat rate for the use of patrol vehicles, and it is assumed this rate will not change as a result of the proposed legislation.

The current wage paid by the City's contractor to security officers is $18.50 per hour. The cost to the City is $27.40 per hour—approximately 48% higher than the wage paid. The supervisory wage is approximately $23.36 per hour, with the charge to the City being $34.58. It is assumed that the contractor will continue to apply a 48% markup for overhead and profit. The Department of Labor's wage determination for "Guard 1" in the Baltimore area lists a wage of $19.39 per hour and $4.98 in health and welfare benefits, for a total required compensation of $24.37 per hour. This is the only publicly available rate of the two mentioned above and thus was used to build this model. This represents a $5.87 per-hour increase. Due to wage compression, supervisory wages are also expected to increase. Currently, supervisory officers earn approximately 26% more than nonsupervisory employees. Under the new rates, supervisory wages are estimated to increase to $33.77 per hour, with the charge to the City rising to $49.98.

The table below outlines the hours and wages under the current contract as well as the estimated rates under Bill 25-0116.

Type of Hour	Hours worked per week	Current Contract Wage (cost to City)	Wage under 25-0116 (cost to City)
Weekly hours worked (nonsupervisory)	6,565	$18.50 ($27.40)	$24.37 ($36.07)
Weekly hours worked (supervisory)	410	$23.36 ($34.58)	$33.77 ($49.98)
Weekly hours used (car)	24	$13.52	$13.52

In the current contract, approximately 7% of the total cost can be attributed to holiday pay, overtime, and emergency assignments. It is assumed that this proportion will remain the same under a new contract. The table below outlines the weekly and monthly costs the City incurs for the security services contract and compares current costs to the projected costs under Bill 25-0116.

	Current Costs	Projected Costs	Difference
Weekly Cost	$194,394	$259,555	$65,161
Monthly Cost	$777,576	$1,038,221	$260,645
2-Month costs	$1,555,153	$2,120,625	$565,472
Overtime, holiday pay, and emergency assignments	$108,211	$148,444	$40,233
Total Cost	**$1,663,364**	**$2,269,068**	**$605,704**

Oversight Cost Projections

The Wage Commission would also need to hire additional staff to process violations of the legislation. The Office of Equity and Civil Rights has indicated they would need two additional Program Compliance Officer II positions to meet the requirements of this legislation. These positions have a salary of $70,509 with $36,450 in benefits for a total of $106,959 per position and $213,917 for the two positions. After a year, the Wage Commission has stated that they would assess staff workload to see if additional staff are necessary.

Overall, Bill 25-0116 is expected to meaningfully increase the wages of security officers as well as the cost of security services across multiple City agencies and affiliated institutions. While the bill aims to establish fairer compensation standards for security officers, the resulting rise in contract expenses will require additional funding to maintain current service levels.

Other Considerations

This legislation also impacts private businesses in the City who utilize private security contracts. These companies and firms will also see an overall increase in their costs. It is expected these costs will be passed on to consumers.

To estimate the potential impact on local businesses, the Department of Finance drew from the Occupational and Employment Wage Statistics (OEWS) program, managed by the Bureau of Labor Statistics (BLS) in partnership with State Workforce Agencies (SWAs). This program provides annual employment, and wage estimates for approximately 830 occupations. Data is collected from business establishments over a three-year period, excluding self-employed individuals, unpaid workers, and owners of unincorporated firms. The OEWS uses the Standard Occupational Classification (SOC) system to

categorize job roles. The survey is conducted twice a year (May and November), and no establishment is surveyed more than once every three years, reducing the response burden.

In 2024 (the most recent year for which the report is available) the median hourly wage for a security officer in Baltimore was $17.55; this is the average wage paid across all security service companies, not the average per-employee wage rate. As noted previously, the wage set by the Department of Labor for "Guard 1" is $24.37, representing a $6.82 increase in the cost of security services per hour, excluding the security service company's overhead. Any increases in wages and benefits would be passed along to businesses contracting these services in Baltimore. To continue operating, businesses would either need to reduce security services or cut costs in other areas, such as staffing, to accommodate the higher expenses associated with security services.

Conclusion
Council Bill 25-0116 aims to ensure fair compensation for security officers in Baltimore City. However, the legislation carries substantial fiscal implications for the City, its agencies, affiliated institutions, and the local business community. Increased costs for security services will require careful budget planning, as agencies may face higher operational expenses and businesses may need to adjust staffing or service levels to absorb these costs. While the bill advances equity for security officers, it also underscores the need for strategic financial planning to balance fair labor standards with the City's and local businesses' economic capacity.

For the reasons stated above, the Department of Finance opposes City Council Bill 25-0116.

cc: Michael Mocksten
Nina Themelis

CITY OF BALTIMORE
MAYOR BRANDON M. SCOTT

TO	The Honorable President and Members of the Baltimore City Council
FROM	Director Berke Attila, Department of General Services
CC	Mayor's Office of Government Relations
DATE	December 9, 2025
SUBJECT	25-0116 – Security Officers Compensation

Position: Without recommendation

BILL SYNOPSIS

This bill would require employers in certain security-related roles to pay their security officers a guaranteed minimum level of compensation. It sets definitions for who qualifies under the law, outlines when the new requirements would take effect, and includes a timeline for when some of the provisions would end. Overall, the bill is meant to ensure more consistent and fair pay for security officers working in Baltimore.

SUMMARY OF POSITION

The Department of General Services (DGS) has reviewed the Security Guard Compensation Bill and the associated report. After careful evaluation, DGS has no hesitation or operational concerns regarding this legislation. The bill does not pose an operational impact to DGS functions or service delivery.

The considerations raised by the bill relate primarily to financial and equity concerns, rather than operational capacity. As such, these matters fall under the fiscal and budgetary purview of the Bureau of the Budget and Management Research (BBMR). Accordingly, DGS aligns its position with BBMR's official stance and will defer to BBMR regarding fiscal impact determinations and funding implications.

It is important to note that current market pricing already exceeds the proposed rates in the bill. The most recent quoted action for guard coverage extension requests is significantly higher than the bill's proposed compensation levels. DGS anticipates that the bill could create a trickle-down effect, leading to increased demands for all facility postings to match the proposed rates.
As context, current pricing under the statewide contract is $27.40 per hour, with extended coverage under emergency terms priced at $36.76 per hour. For comparison, current federal Guard I rates are $19.39 per hour, plus an additional $5.36 per hour for fringe benefits, totaling

$24.75 per hour.

FISCAL IMPACT

There would be no fiscal impact on DGS, as BBMR would serve as the lead agency for all budgetary considerations

AMENDMENTS

N/A

CITY OF BALTIMORE
MAYOR BRANDON M. SCOTT

TO	The Honorable President and Members of the Baltimore City Council
FROM	Amber Greene, Chief Equity Officer and Director Office of Equity & Civil Rights
CC	Mayor's Office of Government Relations
DATE	December 9, 2025
SUBJECT	OECR Report on Baltimore City Council Bill 25-0116 Security Officers – Compensation

POSITION: Unfavorable

BILL SYNOPSIS

The Office of Equity and Civil Rights (OECR) has reviewed and is herein reporting on City Council Bill 25-0116 – *Security Officers – Compensation.*

This is an ordinance that accomplishes the following:

- Defines certain terms related to security workers, security employers, and their compensation.
- Identify covered and excluded security workers and employers under the bill.
- Establish a process by which a minimum wage shall be calculated for security workers.
- Establish a minimum wage for security workers.
- Mandate that it is a violation of the ordinance for employers to pay security workers below the rate established.
- Provide for an effective date.

The legislation accomplished this by adding Section 3-9 to Article 11 – Labor & Employment of the Baltimore City Code.

The bill would effectively set a minimum wage and benefit rate specifically for security workers within the City of Baltimore.

SUMMARY OF POSITION

City Council Bill 25-0116 bases the wage and benefit rate calculation specifically on the average wage and benefit rate of officers *working* at commercial office buildings over 350,000 square feet. However, the wage and benefit rate determined by the ordinance would apply ubiquitously to all covered security workers in the city. The definition of a covered worker is as follows, according to §3-9(A)(5):

(5) COVERED SECURITY OFFICER.

> (I) IN GENERAL.
> "COVERED SECURITY OFFICER" MEANS ANY INDIVIDUAL EMPLOYED IN BALTIMORE CITY TO DO ANY OF THE FOLLOWING:
>
> > (A) PREVENT AND IDENTIFY AND REPORT THE THEFT, MISAPPROPRIATION, OR CONCEALMENT OF GOODS, WARES, MERCHANDISE, MONEY, BONDS, STOCK CERTIFICATES, OR OTHER VALUABLE DOCUMENTS, PAPERS, AND ITEMS;
> > (B) PREVENT AND IDENTIFY AND REPORT THE DAMAGE TO, INTRUSION UPON, OR THEFT OF REAL OR PERSONAL PROPERTY; AND
> > (C) PREVENT AND IDENTIFY AND REPORT ASSAULTS, GATE-CRASHING, OR OTHER DISORDERS AT MEETINGS, EVENTS, OR PERFORMANCES.
>
> (II) EXCLUSIONS.
> "COVERED SECURITY OFFICER" DOES NOT INCLUDE:
>
> > (A) A MARINE GUARD OR SHIP WATCHMAN, REGARDLESS OF WHETHER THE GUARD OR WATCHMAN IS STATIONED ABOARD A SHIP OR ON A PIER; OR
> > (B) AN UNARMED EMPLOYEE OF A BAR, TAVERN, OR RESTAURANT.

With a new minimum wage established for all covered security workers city-wide, all city-contracted security officers currently covered under the Living Wage (Article 5, Subtitle 26) would shift to coverage under the minimum wage law established herein under Article 11. Through this change, the Wage Commission would lose the authority to require payroll submissions or conduct routine, proactive payroll audits of security employers under Article 5, Subtitle 26; however, the Wage Commission will continue to be able to request payroll from employers subject to a minimum wage violation investigation. Under Article 11, contractors are not automatically required to submit payroll records to the Wage Commission. However, the Wage Commission does have the authority to request payroll documents as part of its enforcement and compliance responsibilities.

Because payroll submission is not mandatory under Article 11, oversight in these cases is largely reactive and dependent on complaints or targeted requests. This structure limits the Commission's ability to proactively identify discrepancies, misclassification, and wage violations.

This is notable as, contrary to how the Wage Commission currently enforces wages for city-contracted security workers, enforcement of the minimum wage protections established herein under Article 11 would become complaint-based only, which increases the risk of non-compliance and makes restitution more difficult to obtain. Additionally, ensuring compliance will require significant adjustments.

Enforcement Mechanism

A major hurdle to establishing minimum wage and benefit rates for security workers under Article 11, Division I – Minimum Wage Law (as opposed to how the Wage Commission currently ensures wage compliance for city contracted security workers covered by Article 5, Subtitle 26 – Living Wage), is that Article 11 does not require contractors to submit payrolls or job-site documentation. Without those reports, the options for enforcement of security workers' wages are:

- Rely on/trust voluntary self-reporting from companies (no ability to audit and verify payroll proactively).
- Workers would have to voluntarily file complaints for any violations in order to trigger an investigation in which the Wage Commission may request payrolls, or
- The City simply does not verify and enforce the wages and benefits established herein.

In addition to the aforementioned enforcement challenges, the high turnover and decentralized structure of the private security industry are barriers to full implementation of the legislation.

Consistent and thorough enforcement creates deterrence; contractors adjust their behavior once audits are no longer complaint-driven only. Mandatory payroll submissions give the Wage Commission real-time visibility, proactive audits allow discrepancies to be identified early (misclassification, rate errors, fringe issues), and earlier detection prevents violations from compounding over multiple years and renewals. Without these, oversight, accountability, and compliance are difficult to achieve and maintain.

Awareness

Considerations must be made on the efficacy of informing only Baltimore's security workers of an industry-specific minimum wage and benefit rate, the Wage Commission's existence as an enforcement body, and the importance of filing complaints. To this extent, a question arises:

- How does the City make covered workers aware that one occupation now has a different minimum wage than the universal minimum wage? (As this is not aligned with most workers' conventional understanding of the minimum wage.)

The City and the Wage Commission would also need a robust strategy of continued outreach and awareness to notify every private security company operating in Baltimore, not only those with City contracts, of the new industry-specific minimum wage. This raises additional questions:

- How will the Wage Commission or any City agency communicate these new requirements to all affected employers?
- How will the Wage Commission or any City agency communicate these new requirements to all affected employees?
- Will the City rely on private companies to notify their employees, and is that an effective strategy for raising awareness?
- What process will ensure that employees actually receive the correct pay and benefits?

Minimum Wage Calculation

§3-9(B) of City Council Bill 25-0116 establishes the minimum wages and benefits to be based on the greater of two values for a given year. They are as follows:

THE COMPENSATION AMOUNT FOR A COVERED SECURITY OFFICER IN THE CITY MAY NOT BE LESS THAN THE HIGHER OF:

> (I) FOR THE GUARD 1 CLASSIFICATION ESTABLISHED BY THE UNITED STATES SECRETARY OF LABOR PURSUANT TO CHAPTER 67 OF 41 U.S.C. § 6701 ET SEQ., AS AMENDED, THE COMBINED VALUE OF THE MINIMUM WAGE RATE, HEALTH AND WELFARE RATE, AND PAID VACATION AND HOLIDAYS RATES SET FORTH IN THE LOCALITY WAGE DETERMINATION ISSUED BY THE ADMINISTRATOR OF THE WAGE AND HOUR DIVISION OF THE EMPLOYMENT STANDARDS DIVISION OF THE U.S. DEPARTMENT OF LABOR FOR THE AREA THAT INCLUDES THE CITY; OR
>
> (II) THE COMBINED VALUE OF:
>
> > (A) THE AVERAGE PER-EMPLOYEE WAGE RATE; AND
> > (B) THE AVERAGE PER-EMPLOYEE TOTAL BENEFIT RATE.

The calculation prescribed under §3-9(B)(1)(I) is conducted by the Federal Government and is simple to utilize, does not require staff hours from the Wage Division to identify, and is an industry standard-setting calculation. Establishment of a minimum wage for security officers based on this calculation would be logistically feasible.

The federal government calculates wage rates for service contracts under the McNamara–O'Hara Service Contract Act (SCA). The U.S. Department of Labor (DOL), specifically the Wage and Hour Division (WHD), is responsible for setting these rates.

Federal service contract rates are calculated by the Department of Labor using:

1. **Local wage surveys** to find out what people are actually paid.
2. **Collective bargaining agreements**, when applicable.
3. **A National Health & Welfare rate**, updated annually.

4. **Economic and inflation indicators** to keep wages current.
5. **Geographic-specific wage determinations** based on the county or region.

Security Guard I SCA rates in this region have gone from roughly **$14/hr to about $20/hr** over the last decade, *plus* separate health & welfare that is currently in the $5+ per hour range.

With respect to §3-9(B)(1)(II) of the bill, the OECR has considerable reservations on the feasibility of expecting the Wage Commission to determine a minimum wage rate and benefit rate under this calculation. The bill requires the Wage Commission to use the average per-employee wage rate and average per-employee total benefit rate for all commercial security workers working at a facility over 350,000 square feet; however, the bill does not elucidate nor prescribe how the Wage Commission would obtain this information. Currently, the Wage Commission adjusts its Living Wage each year using the Consumer Price Index (CPI) for All Urban Consumers (CPI-U) in the Washington–Baltimore–Arlington, DC–MD–VA–WV area, published by the U.S. Bureau of Labor Statistics (BLS).

Under Council Bill 25-0116, the Wage Commission would be required to determine the average wage and benefit rate for **ALL** security workers working at commercial office buildings over 350,000 square feet, Baltimore City contracted and private-sector; however, there is no existing structure or mechanism by which the Wage Commission could access this information for private employers to make such a calculation. As such, the OECR is left with the following questions:

- Will this information be self-reported?
- Will regulations be created to require building owners or security companies to submit wage and benefit data?
- What happens if a company does not report or provides incomplete information?

IMPLEMENTATION

The OECR, through the Wage Commission, will determine the required compensation rate for covered security officers working in commercial office buildings of 350,000 square feet or more using a two-step, annual analytical process mandated by the legislation. To potentially achieve this, the Wage Commission would have to:

First, identify the applicable federal Service Contract Act (SCA) "Guard 1" wage determination issued by the U.S. Department of Labor for the Baltimore locality. This includes the minimum hourly wage rate, health and welfare rate, and the required paid vacation and holiday provisions. These components will be converted into a total hourly compensation value for comparison purposes.

Second, calculate a local market-based compensation benchmark by analyzing the average per-employee wage rate and the average per-employee total benefit rate for security officers employed at qualifying 350,000+ square-foot commercial office buildings within the City. This analysis will rely on a combination of available industry data, payroll information reviewed through prior enforcement activity, publicly available labor data, and targeted outreach with private security employers and building operators. Benefit costs will be assessed on an hourly

equivalent basis and will include bona fide fringe benefits such as health insurance, retirement contributions, paid leave, and training or apprenticeship costs, as defined in the legislation.

Challenges associated with this second step may include limited access to reliable, accurate, and transparent private-sector wage and benefit data from these sources, the absence of mandatory reporting requirements for non–City contractors, and potential variability in how fringe benefits are structured and valued across employers. Additional challenges may include self-reporting inconsistencies, incomplete participation by security companies or property owners, and constraints on the Commission's ability to independently verify submitted information. These factors may affect both the timeliness and accuracy of the local-market compensation analysis unless supplemental reporting mechanisms, regulatory guidance, or interagency coordination are established.

The Wage Commission would then have to compare the total hourly value of the federal SCA package to the locally derived wage-and-benefit average and adopt the higher of the two amounts as the required compensation rate.

External coordination may include consultation with the U.S. Department of Labor (which may pose unique challenges), collaboration with City finance and procurement agencies as needed, and reliance on the cooperation of private-sector stakeholders.

FISCAL IMPACT

OECR currently handles wage disputes through a mix of proactive compliance work and complaint-based investigations, depending on the law involved. For Living Wage and Prevailing Wage enforcement, this includes reviewing payroll submissions, analyzing wage data, conducting site visits when needed, and issuing findings to recover back wages and assessing penalties. For Article 11 matters, enforcement is largely complaint-driven and depends on employees coming forward with concerns.

On an ongoing basis, OECR reviews payrolls, investigates complaints, calculates restitution, works with contracting agencies, and follows up with employers to ensure violations are corrected. Much of this work also involves direct communication with workers—helping them understand their rights and guiding them through the complaint process—as well as responding to questions from employers and City agencies.

Looking ahead, OECR anticipates an increase in wage-dispute work if the proposed legislation is implemented. Expanding coverage to additional private-sector employers, combined with the lack of routine payroll reporting, is likely to result in more employee complaints and more complex investigations. Many cases may involve questions about benefit calculations, worksite assignments, or inconsistent pay practices across locations, which will require additional time and coordination to resolve.

To manage both current workloads and expected increases, OECR will need additional staff capacity and resources to fulfill the following:

- Manage annual rate calculations

- Conduct thorough industry outreach
- Manage legal compliance
- Manage complaint investigation
- Monitor multi-site employers
- Data analysis support
- Policy analysis support
- Outreach and communication to educate private security companies, building operators, employees, and City agencies on the legally mandated wage and benefit rates.
- Establish new systems and procedures, including reporting mechanisms, enforcement protocols, regulatory amendments, public guidance, and tools for annual data collection.

Without increased capacity, it will be extremely difficult for the Commission to implement and enforce this law effectively and equitably, and as a result, the City and covered employers would likely fall out of compliance. Most importantly, OECR's ability to respond quickly and ensure workers receive the wages they are owed may be limited.

As such, the OECR preliminarily estimates that at least three (3) additional staff positions/PIN's would need to be added to the OECR's Fiscal Year 2027 budget to support implementation, rate-setting, investigations, and wage-violation enforcement by the bill's effective date.

The process and timeline for posting, hiring, training new staff, and preparing the office for enforcement responsibilities would be as follows:

I. Posting:

1-3 days to upload job posting of three new PINs to be available for applicants to apply.

II. Hiring:

45 days (30 days for interviewing and selection, 15 days to allow for background checks.)

III. Training:

120 days to ensure employees are fully trained on the requirements and compliance (OECR Chief Stafford/Wage Division). This training would consist of the following: learning the law, learning how to audit payrolls, conducting on-site visits, and communicating with contractors.

Operationalizing this legislation will require a multi-phased approach to ensure staff readiness, effective outreach, and enforceability, for which the OECR currently does not have the bandwidth to accommodate without significant allocation of additional staffing and resources.

I. Preparation and Legal Alignment (Months 1–2):

OECR will confirm legal interpretation with the Law Department, address enforcement authority under Article 11, This phase will include coordination with the Law Department to clarify compliance obligations, investigative authority, and interaction with existing wage enforcement frameworks. OECR will also assess internal readiness,

including staff training needs related to minimum wage enforcement procedures, rate application, documentation standards, and complaint-based workflows associated with Article 11.

II. Staffing, Training, and Infrastructure (Months 2–4):

Additional staff will be needed to support outreach, intake, and investigations. OECR will develop new procedures, tracking methods, and enforcement workflows specific to Article 11 and conduct staff training on minimum wage and complaint-based enforcement.

III. Outreach and Public Education (Months 4–6):

Due to payroll reporting not being required, and the City cannot rely solely on employers to notify workers of their new rights, OECR will conduct direct outreach to employees, private security companies, and building operators, including multilingual education efforts and coordination with community partners.

IV. Rate Determination and Enforcement (July 1–January 1):

The Wage Commission will determine and publish the annual compensation rate by July 1st. Enforcement will begin once the rate becomes effective on January 1 and will be primarily complaint-based, requiring continued outreach and monitoring.

Successful implementation will depend on timely staffing increases, clear legal guidance, and sufficient resources to support outreach and enforcement.

Notably, Section 1 and Section 3 of Council Bill 25-0116 require the Wage Commission to determine its wage and benefit rate calculation by July 1, 2026. This requirement is not possible to fulfill due to the aforementioned staff and resource allocations needed to operationalize the ordinance. The soonest these budgetary needs would be addressed is the Fiscal Year 2027 budget, in which the timeline above would be able to begin July 1, 2026 at the earliest.

CONCLUSION

Upon reviewing City Council Bill 25-0116, the OECR has not discerned inequity in the purpose of the legislation and appreciates the effort to obtain better wages and benefits for the City's security workers. As the agency within the City of Baltimore entrusted to uphold wage law and fair working conditions, the Office of Equity & Civil Rights, on principle, supports efforts and legislation to raise wages, ensure more robust worker benefits, and strengthen labor rights.

However, the methodology, approach, and logistics matter when considering how Baltimore collectively works to achieve these goals. Due to the aforementioned concerns on the various logistical hurdles that make the legislation prohibitive to implement and enforce as written, the OECR believes Council Bill 25-0116 may enact a mandate that the City will be unable to meet. The office supports the Sponsor's effort behind the bill to secure better wages for the City's workers and is open to further collaboration and discussion on how this may be achieved between

the Sponsor, the City Council, and the Administration. As such, the Office of Equity and Civil Rights respectfully requests an **unfavorable** committee report on City Council Bill 25-0116 at this time.

Respectfully Submitted,

Amber Greene
Director, Office of Equity & Civil Rights

Baltimore City Council

Labor & Workforce

Committee

Bill: 25-0116

Title: Security Officers - Compensation

Public Testimony

Testimony
Bill #25-0116
Position: **FAV**

To Chair Jones and Members of the Labor Committee,

My name is Brige Dumais. I am the Political Coordinator for 1199SEIU United Healthcare Workers East. We are the largest healthcare workers union in the nation, representing 5,000 members in Baltimore. Our union urges a **favorable** report on Bill # 25-0116 to establish minimum standards for security officers across our city because a significant portion of security officers in Baltimore work at hospitals, side by side with 1199 members. We want to ensure that all workers at hospitals earn a base wage that allows them to live with dignity.

Security officers are often first responders who help to de-escalate conflicts and keep Baltimore residents safe. Yet, many are unable to afford to live thriving lives in Baltimore, as they earn under $16/hour. Workers earning poverty wages in these times is even more dire than ever before due to the impending cuts to Medicaid and other social safety net programs that low wage workers typically rely on for support. Passing this bill can lift thousands of Baltimoreans out of poverty and help them afford necessities like healthcare that will no longer be adequately funded because of devastating federal Medicaid cuts.

Please vote YES on Bill #25-0116. Thank you.

In Solidarity,

Brige Dumais (they/them)
Political Coordinator, 1199SEIU
brigette.dumais@1199.org

Nicole Tortoriello, Managing Attorney
Workplace Justice Project
Public Justice Center
201 North Charles Street, Suite 1200
Baltimore, Maryland 21201
410-625-9409, ext. 279
tortoriellon@publicjustice.org

Bill 25-0116: Security Officers — Compensation

Hearing before the Baltimore City Council Labor & Workforce Committee, December 10, 2025

Position: FAVORABLE

The Public Justice Center (PJC) is a not-for-profit civil rights and anti-poverty legal services organization which seeks to advance social justice, economic and racial equity, and fundamental human rights in Maryland. Our Workplace Justice Project works to expand and enforce the right of low-wage workers to receive an honest day's pay for an honest day's work. The PJC supports Bill 25-0116, which would set a minimum living wage for security officers in Baltimore city.

Security Officers Work in a Vulnerable Profession in Need of Support

There are over 4500 security officers working in Baltimore, and unfortunately they work in a particularly vulnerable profession. This is an industry characterized by substandard wages, legal violations, and as a result, higher turnover. Security officer turnover rates are, by some estimates, up to 300% annually. Higher wages will help improve retention, reducing this turnover and encouraging higher expertise that comes with experience among the city's security workforce.

One common legal violation occurring within the security industry is rampant misclassification, with employers falsely claiming their workers are independent contractors. The Department of Labor sued a security firm in Chicago seeking more than $450,000 in unpaid wages and damages in 2023 for this form of wage theft. Closer to home, the DC Office of the Attorney General sued a Maryland-based security firm in 2021 for misclassifying its workers. When workers are misclassified, they are cut out of the social safety net and lose protections like sick leave, workers' compensation, health insurance, and more. The security workforce is in need of stronger workplace protections, oversight, and regulation. While this bill won't address all of these problems immediately, increasing the minimum wage is an important means of supporting and professionalizing this workforce.

Other jurisdictions have recognized the need to support vulnerable professions. Security officers in Washington, DC at city office buildings have received a wage and benefit rate higher than minimum wage since 2008. Workers at BWI airport and Baltimore's Penn station have had an increased minimum wage since 2021, due to a similar high rate of turnover and inexperience among

the workforce. Also in 2021, New York and New Jersey set higher wage and benefit rates for certain workers at JFK, LaGuardia, and Newark Airports. Moreover, some localities in Maryland have recognized the need for higher wages for all, with Montgomery County setting the minimum wage for large employers at $17.65, and Howard County at $16. Baltimore would not be an outlier in setting a higher wage rate for security officers in need of greater workplace protections.

Higher Wages Will Support Workers and Baltimore's Economy

Marylanders working minimum wage jobs already live paycheck to paycheck. In Baltimore, many security officers make as little as $15.80 per hour, just 80 cents more than the minimum wage. While inflation has significantly increased prices from the gas pump to the grocery store, workers continue to bring home the same pay. As a result, minimum wage workers struggle to afford basic necessities and, often, cannot make ends meet. In 2023, about half of Baltimore's security officers relied on public health insurance and a third received food stamps or SNAP assistance.

These state programs subsidize near-poverty wages by helping Maryland families cover basic necessities that their low wages make them unable to afford. Because low-income workers buy household necessities from local retailers, increasing the minimum wage for these workers will also inject revenue into Baltimore's economy. Increasing actual wages would allow for greater financial independence and lessen the burden on public programs, while helping the Baltimore economy.

For the foregoing reasons, the PJC **SUPPORTS BILL 25-0116** and urges a **FAVORABLE** report. Should you have any questions, please call Nicole Tortoriello at 410-625-9409 ext. 279 or tortoriellon@publicjustice.org.

Center for American Progress
1333 H Street NW, Suite 100E
Washington, DC 20005
202.682.1611
americanprogress.org

Establishing compensation standards for security guards: Testimony before the Baltimore City Council Labor & Workforce Committee on 25-0116

Karla Walter
Senior Fellow, Economic Policy
Center for American Progress

December 10, 2025

Thank you, Members of the Baltimore City Council Committee on Labor and Workforce for this opportunity to testify. Today, I will provide context and support for policies to adopt wage and standards for building security guards.

My name is Karla Walter. I am a Senior Fellow for Economic Policy at the Center for American Progress. CAP is an independent, nonpartisan, and progressive education and advocacy organization dedicated to improving the lives of Americans through ideas and action.

I have conducted extensive research on how cities, states, and the federal government can uphold decent wage and benefit standards for workers and support a well-qualified workforce that delivers good results for the public.[1] In October, my team released a report finding that low pay and poor benefits among security officers undermine workers' ability to make ends meet; fuel high industry-wide turnover; and reduce the retention of experienced, well-qualified workers.[2] In my testimony, I will situate the legislation in a national context and make three main points:

1. Security officers are paid stagnant wages and receive insufficient benefits.
2. Wage and benefits standards improve outcomes for workers and the public.
3. Security officer wage standards have been successfully adopted in other cities and states.

Security officers are paid stagnant wages and receive insufficient benefits

Security officers perform essential services to keep people safe at office buildings, hospitals, government buildings, and corporate campuses. They also act as first responders in emergencies. Too often, however, security officers are paid low wages and do not receive employer-sponsored health benefits.

New Center for American Progress analysis shows that security officers' wages have flatlined over the past 15 years even as the cost of living has soared.[3] In 2003, a typical security officer earned $17.05 per hour in 2024 dollars, while the median security worker in 2022 earned two cents less at $17.03 per hour. By comparison, the cost of rent grew by more than 14 percent over this period even when accounting for inflation.

Moreover, the analysis finds that approximately 40 percent of security officers do not receive employer-provided health insurance. The lack of access to health insurance forces a significant number of security officers to rely on Medicaid. According to ACS data, nearly 18 percent of all security officers were enrolled in Medicaid in 2023, compared with only 10 percent of private sector workers overall.[4]

Without local intervention, difficulty accessing affordable care will likely grow in the coming months. Many security workers will likely face greater insurance costs due to Medicaid funding cuts included in the federal One Big Beautiful Bill Act.[5] A previous CAP analysis found that a worker supporting a family of four with Medicaid and earning $33,000 per year—just below the median wage for a full-time security worker—will face up to $1,650 in increased out-of-pocket insurance costs.[6]

Finally, poor compensation disproportionately affects Black and Hispanic guards, who account for most workers in the occupation but earn around 10 percent less per hour than white security officers.[7]

Wage and benefits standards improve outcomes for workers and the public

Low wages and insufficient benefits contribute to high industry turnover. According to CAP analysis, in 2023, annual turnover among security officers reached nearly 51 percent nationwide.[8]

High turnover rates not only increase staffing costs as new workers need to be hired and trained but also diminish workers' ability to build skills that make them more effective on the job. In the security sector, ensuring a stable supply of well-qualified workers is essential to the public welfare, as security workers are often called on to respond to health emergencies, fires, acts of violence and other types of disturbances.

Increasingly, security industry publications and consultants cite high turnover as leading to training gaps, increased error rates and a lack of experience during "high-stakes scenarios where quick, well-informed responses are required." [9] These same publications recommend that employers raise pay and improve benefits to retain qualified workers.

Indeed, research demonstrates that wage, benefit and job quality laws help to boost the economic security of security officers and other workers, reduce turnover and promote high standards for the public. For example, one national study looking at the impact of wage standards on building service workers, finds that the laws support higher wages, increase the portion of employers providing health insurance benefits, and help to narrow racial pay gaps.[10]

After the city of San Francisco instituted a wage standard for airport workers, annual turnover rates among security screeners fell from 95 percent to 19 percent and employers saved about $4,275 per employee in restaffing costs.[11] Employers also reported that the standard helped increase morale and improve indicators of security, performance and customer service.

Similarly, a review of state and local contracting practices by the National Employment Law Project found that the adoption of wage standards often decreases employee turnover, which leads to savings in re-staffing costs, a more productive workforce, and improvements to the quality of public services—thereby helping to offset the cost of such a standard.[12]

Security officer wage standards have been successfully adopted in other cities and states.

Improving security officer compensation in Baltimore would similarly help to improve the lives of workers across the city, reduce racial pay disparities and guarantee a well-qualified workforce that maintains public safety.

By adopting wage and benefits standards for security guards employed wholly by the private sector, the proposal would build on the city's existing living wage standard for government service contracts.[13] While Baltimore was the first U.S. city to adopt a living wage standard, cities, states and the federal government have long established wage and benefits standards on government supported work to ensure that contracting and other sorts of government spending upholds basic standards and do not undercut market wages.[14]

Increasingly, some cities and states are going further to extend occupationally specific wage standards in essential sectors where low-wages and poor working conditions are driving high turnover and undercutting workforce experience levels.

For example, the District of Columbia requires all security officers working in commercial office buildings in the city to be paid at least the total compensation—wages and benefits—that prevails in the sector.[15] In justifying the law, the Council of the District of Columbia stated:

> Any wage that is not sufficient to provide adequate maintenance and to protect health impairs the health, efficiency, and well-being of persons so employed, constitutes unfair competition against other employers and their employees, threatens the stability of industry, reduces the purchasing power of employees, and requires, in many instances, that their wages be supplemented by the payment of public moneys for relief or other public and private assistance.

Because of the law, District of Columbia security officers are entitled to at least $19.39 per hour in wages plus an additional $5.36 per hour in benefits or their cash equivalent.[16]

And New York state requires that major energy generation facilities and critical infrastructure transmission or distribution facilities pay building service employees, including security guards, at least the prevailing wage and benefit rate.[17] Among the justifications for the law is that it can help ensure the security of critical infrastructure by reducing turnover and allowing for a more developed and trained workforce. In addition, New York City policymakers are debating a proposal to adopt a wage, benefit and training standard for security officers across the city.[18]

In occupations outside of security, California sets a compensation standard for registered apprentices on private construction projects based on the state prevailing wage.[19] And several states (California, Colorado, Michigan, Minnesota, New York, and Nevada) and three cities have (Seattle, Detroit, and Philadelphia) established industry standards boards that bring together representatives of workers, employers, and government to help set and enforce minimum workplace standards—including wages, hours, training, and safety—for an entire sector of the economy, such as fast food, nursing homes, home care, or agriculture.[20]

Conclusion

Security officers fulfill a crucial role protecting businesses and the public but are paid low wages and offered few benefits. These problems force workers to depend on public services for basic needs such as health insurance and drive high turnover rates that can ultimately endanger the public. Pro-worker policies such as occupational wage and benefit standards can help alleviate these problems, ensure decent pay and standards across the industry, and reestablish the city as a national leader.

Endnotes

[1] See, for example: Karla Walter, "Government on Workers' Side: How State and Local Policymakers and Advocates Can Raise Standards for Publicly Supported Work," (Washington, DC: Center for American Progress, 2024) available at https://www.americanprogress.org/article/government-on-workers-side/; Karla Walter, "Strong Prevailing Wage Standards Help America's Economy and Workers, *Wisconsin State Journal,* October 21, 2023, available at https://madison.com/opinion/column/karla-walter-strong-prevailing-wage-standards-help-americas-economy-and-workers/article_537b6dbc-4c82-5b6a-8135-50dbc914e8de.html; Aurelia Glass and Karla Walter, "Too Many Airport Service Workers Earn Low Wages and Benefits," (Washington, DC: Center for American Progress, 2025), available at https://www.americanprogress.org/article/too-many-airport-service-workers-earn-low-wages-and-benefits/; Karla Walter, "How State Spending Can Create a Good Jobs Economy," (Washington, DC: State

Innovation Exchange, 2025) available at https://stateinnovation.org/wp-content/uploads/2025/03/How-State-Spending-Can-Build-a-Good-Jobs-Economy-State-Innovation-Exchange-1.pdf.

[2] Aurelia Glass, "Low Standards Hurt Security Officers' Ability to Make Ends Meet," (Washington, DC: Center for American Progress, 2025), available at https://www.americanprogress.org/article/low-standards-hurt-security-officers-ability-to-make-ends-meet/.

[3] Ibid.

[4] Ibid.

[5] One Big Beautiful Bill Act, H.R.1, 119th Cong., 1st sess. (July 4, 2025), available at https://www.congress.gov/bill/119th-congress/house-bill/1.

[6] Andrés Argüello and Andrea Ducas, "House Republicans' Big, 'Beautiful' Bill Would Make Health Care More Expensive for Americans With Medicare and Other Insurance" (Washington: Center for American Progress, 2025), available at https://www.americanprogress.org/article/house-republicans-big-beautiful-bill-would-make-health-care-more-expensive-for-americans-with-medicare-and-other-insurance/.

[7] Glass, "Low Standards Hurt Security Officers' Ability to Make Ends Meet."

[8] Glass, "Low Standards Hurt Security Officers' Ability to Make Ends Meet."

[9] El Dorado Insurance Agency, "The Hidden Costs of Turnover: How Employee Retention Reduces Risk for Security Firms," November 18, 2024, available at https://www.eldoradoinsurance.com/security-industry-news/the-hidden-costs-of-turnover-how-employee-retention-reduces-risk-for-security-firms/. See also, TrackTik, "10 Strategies to Reduce Turnover Rates, Increase Engagement, and Retain Your Security Officers," May 17, 2024, available at https://www.tracktik.com/blog/strategies-to-reduce-turnover-rates-increase-engagement-and-retain-your-security-officers/.

[10] Frank Manzo and Robert Bruno, "The Impact of Service Contract Prevailing Wage Laws in the United States and Illinois: Effects on the Labor Market Outcomes of Janitors and Custodians" (La Grange, IL: Illinois Economic Policy Institute, 2021), available at https://illinoisepi.files.wordpress.com/2022/01/ilepi-pmcr-service-contract-prevailing-wages-final.pdf.

[11] Micheal Reich, Peter Hall, and Ken Jacobs, "Living Wages and Economic Performance: The San Francisco Airport Model" (Berkeley, CA: UC Berkeley Labor Center, 2003), available at https://laborcenter.berkeley.edu/living-wages-and-economic-performance-the-san-francisco-airport-model/. See also, Amanda Gallear, "The Impacts of Wages and Turnover on Security and Safety in Airports: A Review of the Literature" (Berkeley, CA: UC Berkeley Labor Center, 2017), available at https://laborcenter.berkeley.edu/pdf/2017/SFO-literature-review.pdf.

[12] Paul K. Sonn and Tsedeye Gebreselassie, "The Road to Responsible Contracting: Lessons from States and Cities for Ensuring That Federal Contracting Delivers Good Jobs and Quality Services" (Washington: National Employment Law Project, 2009), available at https://www.inthepublicinterest.org/wp-content/uploads/The_Road_to_Responsible_Contracting.pdf.

[13] Baltimore City Code Article 5, Subtitle 26, available at https://codes.baltimorecity.gov/us/md/cities/baltimore/code/5/26.

[14] Jeff Chapman and Jeff Thompson, "The Economic Impact of Local Living Wages," (Washington, DC: Economic Policy Institute, 2006) available at https://www.epi.org/publication/bp170/#:~:text=The%20living%20wage%20movement%20began%20in%20Baltimore,cost%20of%20contracts%20does%20not%20rise%20significantly.

[15] Compensation rates are set equal to the combination of minimum wage and fringe benefits required for the guard 1 classification under the Service Contract Act. Code of the District of Columbia, "Chapter 10. Minimum Wages," available at https://code.dccouncil.us/dc/council/code/titles/32/chapters/10/

[16] Department of Employment Services, "District of Columbia Security Officer Minimum Wage," Announcement of July 1, 2024 to June 30, 2026 updated wage rates, available at: https://does.dc.gov/sites/default/files/dc/sites/does/publication/attachments/July%202025-June%202026%20Security%20MW%20Rate%20Notice.pdf.

[17] New York Public Service Law Chapter 48, Article 2, Sec. 42-A, available at https://www.nysenate.gov/legislation/laws/PBS/42-A.

[18] New York City Int. 1391-2025, "Establishment of Compensation and Training Standards for Security Guards," available at https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=7681684&GUID=85593CB6-D9D4-473B-9EC0-88F301E5B320.

[19] Cal. Code. Regs. §208, available at https://www.law.cornell.edu/regulations/california/8-CCR-208.

[20] David Madland and Sachin Shiva, "Industry Standards Boards Are Delivering Results for Workers, Employers, and Their Communities," (Washington, DC: Center for American Progress, 2024) available at https://www.americanprogress.org/article/industry-standards-boards-are-delivering-results-for-workers-employers-and-their-communities/.

Bill 25-0116 – Worker Testimony (Lavette Williams)

Good evening. My name is Lavette Williams, and I am here to express my strong support for the Security Compensation Bill 25-0116 that would lift up the standards for security officers across Baltimore City.

I am a lifelong Baltimore City resident, and I find fulfillment in serving the community that raised and shaped me. I'm 55 years old and have been a security guard for almost seven years. You could say it's a family business —my twin sister and I work as guards, both committed to protecting the community we deeply love.

I love working as a guard because I love meeting new people and offering a warm, encouraging greeting. You never know what someone is going through, and I take pride in being a positive presence. Contributing to the safety of my community gives me purpose.

I'm a hardworking woman doing everything I can to make ends meet. My partner and I are guardians to my two grandchildren, ages 9 and 7. To provide for them I work three jobs. I work two security positions, and I also serve as a residential counselor for seniors with disabilities. Even with all of that, I am still living paycheck to paycheck. It should not be this way. An essential worker tasked with public safety and vigilance should not be barely scraping by. We play multiple roles and wear many hats every day in our role.

I'm grateful that I'm still able to get up each morning with the health and strength to work, but I'm also afraid of how much longer I'll be able to sustain this pace.

Higher wages would mean no longer having to work three jobs just to provide for my family. It would mean not living paycheck to paycheck, and it would give me the opportunity to truly thrive in the community I have always worked to uplift.

We all deserve dignity, and our city owes it to the people who keep Baltimore safe to ensure we are compensated fairly. That's why I am here to say: please pass Bill 25-0116. We give so much to this city, it is time for the city to step up for us.

Thank you.

Bill 25-0116 - Lavonna Shaw

Good evening everyone,

My name is Lavonna Shaw. I am here to testify in support of Security Officers - Compensation Bill # 25-0116.

I am a 65-year-old security guard who takes great pride in my career and the work I do. I have been a security guard for 15 years, keeping visitors and city residents safe.

Although my current job offers health insurance, I quickly realized it was a bottom-tier plan that would cover little to none of my necessary medical expenses. I have multiple medical conditions, some of which are life threatening.

I am a hardworking, caring woman who rarely asks for help unless it is absolutely necessary—and now it is. I applied for Medicaid and was denied because my income is just $100 over the limit. I applied for Medicare, not realizing I would be charged $1,100 for two missed cycles of premiums, an amount I simply could not afford. I have turned to community clinics, but even there I'm told I am $50 over the income threshold for assistance. I am being shut out of every path to the care I need. So I am here to ask: What am I supposed to do when the system leaves no room for people like me?

I have hypertension and must remain on my medication. My doctor was able to provide a one-month supply, but once that runs out, I will no longer have my medication or a way to afford it. I also have a cochlear implant, yet I cannot afford my follow-up appointments or the maintenance the device requires. My hearing is becoming more and more difficult as a result.

I have a mortgage, and I struggle month to month to keep up with the payments. I have missed car payments and have fought for years just to stay afloat.

I love meeting the people I encounter each day at my job, and I love encouraging others—even when I feel discouraged myself.

Higher wages and better benefits would mean having health insurance that gives me essential healthcare that I need to survive. It would mean catching up on bills and sustaining the life I have worked so hard to build. For many of us, it's not only about earning more than a living wage—it can be the difference between life and death. That's why I'm asking the Council to pass Bill 25-0116.

Thank you.

Bill 25-0116 – Worker Testimony (Kisha Parnell)

Good evening. My name is Kisha Parnell, and I am here in support of Bill 25-0116.

I am 37 years old, and I have been working as a security officer for nine years. I currently work warehouse shifts. I'm a hardworking, caring mother and I am the sole provider for my two children, who tragically lost their father. My 7-year-old daughter and my 9-year-old autistic son are what keep me going every day.

As a full-time security guard and sole provider, my wages are barely enough to get by. With the cost of living rising while wages stay the same, I'm constantly walking a financial tightrope to make sure my children and I have a chance at a life where we can thrive. I often fear unexpected emergencies because I don't know if one incident will be the tipping point into serious financial trouble.

As security guards, we put our lives and safety on the line every single day. I have been yelled at, belittled, and even threatened with violence, including with a deadly weapon—a knife. In moments like those, I am the first line of defense.

So I ask: are the wages and benefits we receive truly worth the risks we face? I love my job, and I value being part of something bigger than myself—protecting my community. But I also have a family I must protect and provide for. And it leaves me asking: how much longer can we be expected to face the risks without the support we deserve?

Higher wages and benefits mean peace of mind, affordable healthcare, and financial stability for my children and me. It would provide a real opportunity to achieve a life where hard work and dedication truly pay off.

This is why I'm here in support of Bill 25-0116

Thank you for your time.

Bill 25-0116 – Worker Testimony (Laura Dixon)

My name is Laura Dixon, and I have proudly served as a security officer for 18 years. I am here in support of Bill 25-0116.

I do this work because I care about my community and its safety. But the truth is doing this job has never been easy, and too often, it has felt like I'm doing it without real support.

For years I was paid the minimum wage. I still have no meaningful benefits, especially when it comes to healthcare. I tried to sign up for the company's health insurance, but it costs over $200 a month and comes with a huge deductible. On my wages, there is simply no way I can afford that.

Today, I'm dealing with serious knee problems. I have no cartilage in either knee, and I need surgery. But without real health insurance, I can't get the care I need. I pay $1,350 in rent, plus utilities, and I'm trying to qualify for Medicaid, but I don't even know if I'll be approved

Being a security officer is dangerous work. We are unarmed. We often work alone, especially at night. And we are the first line of defense when something happens. One night, someone pulled a gun on me while trying to steal a dirt bike. Moments like that are a stark reminder of the real dangers we face every single day just for doing our jobs.

Right now, I'm living paycheck to paycheck, without healthcare, and some days I honestly don't know how I'm getting by. I love the work I do, but after 18 years of service, I believe that I—and all security officers—deserve more than just scraping by. That is why I'm asking you to pass the Security Compensation Bill 25-0116, so the officers who give so much to this city can finally have the security and stability we deserve.

Thank you.

Bill 25-0116 - Worker Story (**Tisha Burrell**)

Good evening. My name is Tisha Burell, I am here to testify in support of Bill 25-0116, which would raise the wage and benefit standards for security officers like me across Baltimore City.

I'm a 25-year-old security guard, and for over a year I've worked to keep Baltimore residents safe — while I myself fall deeper into financial insecurity and exhaustion. I currently make $15 an hour, with no health insurance and no paid time off.

I have a 7-year-old son who depends on me to provide not just a life where he can survive, but one where he can thrive. I am a single mother. My son sadly lost his father, leaving me vulnerable to raise him on my own. On $15 an hour, I cannot afford medical emergencies or the ability to live on my own. Thanks to my mother's support, my son and I have a place to stay.

Too often, I am forced to choose between paying essential bills and making sure my son and I have what we need—groceries, clothing, and basic expenses.

As a security guard, I am entrusted with keeping the community safe. I grant access to authorized residents, stay vigilant, and monitor security systems. I love the work I do, and I take pride in helping our residents and protecting the public.

Better wages and benefits would mean that my son and I could finally have a place of our own and afford healthcare. It would mean no longer living paycheck to paycheck, no more choosing which essential needs we have to postpone until I can find the money. It would mean peace of mind—having emergency funds and a real safety net.

Security officers deserve better standards. We put our lives on the line to keep people safe, even as many of us struggle just to get by. I'm a dedicated worker and a loving mother, and when money gets tight, the stress can be overwhelming. That is why I strongly support Bill 25-0116—to level the playing field and help security officers who give so much to this city finally have the chance to thrive.

Thank you for your time and consideration.

MARYLAND MULTI-HOUSING ASSOCIATION, INC.

Baltimore City Council Bill 25-0116

Committee referred: Labor & Workforce Committee
Bill: 25-0116 Security Officers - Compensation
Date: January 5th, 2026
Position: Unfavorable

The Maryland Multi-Housing Association (MMHA) is a professional trade association established in 1996, whose members house more than 538,000 residents of the State of Maryland. MMHA's membership consists of owners and managers of more than 210,000 rental housing homes in over 958 apartment communities and more than 250 associate member companies who supply goods and services to the multi-housing industry.

For the multi-housing industry partners who utilize them, security officers are hired not to simply protect and oversee the property – but to provide peace of mind to residents who live in these professionally managed communities. They become an integral part of an apartment community's mission to provide the best service to their residents. These security officers can be the first to arrive, respond, and interface with residents and their emergencies at uncommon hours.

To review the potential impact of this legislation on the Baltimore multi-housing rental market, MMHA turned to a prominent Baltimore-based apartment community owner and operator for assistance. Based on their in-house analysis, **this operator expects an immediate annual increase of $12,000 in contracting costs** for their two security officers to continue operating 8 hours each for 7 days a week upon the passage of this legislation. **This cost will be passed onto the residents of these apartment communities, leading to higher rents and further driving housing unaffordability in the City.**

While MMHA agrees with the sentiment and intentions of this legislation, **the addition of <u>another</u> financial burden to apartment communities and their residents that will be paying for this with increasing rents is unacceptable.** Without an exclusion of these apartment communities from the bill, MMHA would respectfully request an unfavorable report on Council Bill 25-0116.

Please contact Matthew Pipkin, Jr. at (443) 995-4342 or mpipkin@mmhaonline.org with any questions.