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July 21, 2023

Office of the Assistant Secretary for Policy and Development  
Department of Housing and Urban Development  
451 7th Street SW, Washington, DC 20410-0500

**RE: FR-6401-N-01 Proposed Changes to the Methodology Used for Calculating Fair Market Rents**

To whom it may concern:

On behalf of the Baltimore Regional Housing Partnership (BRHP), we are writing to express support for the methods used to calculate Fair Market Rents in the Department of Housing Urban Development (HUD) notice titled "Proposed Changes to the Methodology Used for Calculating Fair Market Rents" (FR-6401-N-01), published in the Federal Register on June 23, 2023.

The Baltimore Regional Housing Partnership (BRHP) is a non-profit organization that expands housing choices for families with low incomes, who have historically been excluded from housing in well-resourced neighborhoods, helping them to access and transition successfully to safe, healthy, and economically vibrant communities. As the regional administrator for the Baltimore Housing Mobility Program, BRHP has opened pathways to a better future for families with low incomes for nearly 10 years. BRHP currently provides over 4,300 low-income families rental assistance in the form of the Housing Choice Voucher and couples that with counseling supports for families as they move from areas of concentrated poverty to areas of opportunity in Baltimore City and the five surrounding counties.

As a voucher administrator operating in a market that has seen steady and significant growth of rents over the years, we applaud HUD for these proposed changes to the FMR calculation methodology. BRHP supports both of the changes outlined in the notice, the redefinition of "recent mover" and the inclusion of private sector rent data to update rent estimates.



By limiting the “recent mover” definition to consider rents of households who moved in the current ACS year, HUD makes the “recent mover” measure far more reflective of current market conditions and limits the age of the data to a maximum of 11 months.

Private market data incorporated into the methodology also helps to correct both the lagging CPI and ACS data within the methodology. This change will allow, again, for FMR far more reflective of the current rental market.

Accurate FMRs and SAFMR are essential to the success of voucher programs, especially those committed to further deconcentration of poverty and voucher households. This proposed rule will help ensure that HUD is providing PHAs with FMRs that will help accomplish these important goals. BRHP would like to thank HUD for the opportunity to provide comments on the proposed rule.

Sincerely,

Adria Crutchfield  
Executive Director