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Regulations Division  
Office of General Counsel  
Department of Housing and Urban Development  
451 7th Street SW, Room 10276  
Washington, DC 20410-0500

*Submitted electronically at <http://www.regulations.gov>*

**RE: Baltimore Regional Housing Partnership Support for Proposed Rule: FR-6362-P-01 Reducing Barriers to HUD-Assisted Housing**

The Baltimore Regional Housing Partnership (BRHP) is submitting this comment in full support of the proposed rule regarding the evaluation of criminal records in housing admissions and reducing barriers to Department of Housing and Urban Development (HUD)- assisted housing, a model which aligns with the screening practices our organization has implemented for the Housing Choice Vouchers we administer. As the Regional Administrator for the Baltimore Housing Mobility Program, BRHP has been opening pathways to better futures for low-income families for over 10 years and currently provides over 4,300 low-income families rental assistance in the form of Housing Choice Vouchers coupled with counseling support for families as they move from areas of concentrated poverty to areas of opportunity in Baltimore City and the five surrounding counties.

Under current policy, in many jurisdictions individuals with nonviolent conviction and arrest records often still face unnecessary barriers in accessing stable housing, contributing to increased housing insecurity and homelessness. We commend HUD's initiative to ensure that criminal records are not automatic disqualifiers for individuals seeking housing assistance by clarifying relevant criminal activity for which Public Housing Authorities (PHAs) and owners can screen, placing a limit on lookback periods in admissions decisions to no more than three years prior to an application for most convictions, and clarifying that PHAs cannot rely solely on "illegal drug" use activity that occurred a year ago or longer to establish that the behavior is "current" when evaluating applicants.



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Implementing an individualized review process wherein applicants can challenge the accuracy or relevance of the information found in criminal record screening and provide any mitigating information before the actual denial will provide fair opportunities for those with conviction histories. By emphasizing mitigating factors and circumstances, HUD is acknowledging the complexity of individuals' experiences and their potential for successful tenancy. Moreover, clarifying additional mitigating circumstances that must be considered for termination of an existing lease, including the impact on household members not involved in the criminal conduct, helps to ensure that assisted housing fulfills its promise of giving families needed stability.

We urge HUD to finalize and implement these proposed regulations promptly. By doing so, HUD will take significant strides towards creating a more equitable and inclusive housing system, where more individuals have the opportunity to secure stable and safe housing.

Thank you for your consideration.

Adria Crutchfield  
Executive Director