

HB 6476 AN ACT ALLOWING A DEDUCTION FOR THE COST OF SERVICE ANIMALS FROM RENTAL PAYMENTS FOR SUBSIDIZED HOUSING

Housing Committee Public Hearing

02.14.19

Dear \*\*CHAIRS OF COMMITTEE\*\* and Members of the Housing Committee:

My name is \*\*NAME\*\* and I am submitting testimony representing the Connecticut Apartment Association (CTAA). CTAA represents 70,000 units, the largest number of apartments represented by any single association in the state. CTAA members consist of the state’s leading firms in the multifamily rental housing industry, many of whom manage national portfolios. The association’s mission is to actively lead the apartment industry in providing quality housing by educating, advocating and connecting property owners, managers and vendor partners.

I would like to address HB \*\*Number and Name of bill\*\* – in my testimony.

HB XXX potentially affects all housing providers in the state of Connecticut including providers of subsidized housing and every other housing provider in Connecticut as all landlords are mandated to accept vouchers for RAP and Section 8 subsidies. The intention of the bill is to reduce the financial burden for elderly and disabled persons in subsidized housing by allowing them to deduct the cost of service animals as a medical deduction from their rental costs. The CTAA fully supports assisting the elderly and disabled impacted by the use of a service animal, which is why the CTAA also supports other legislative efforts such as penalties for the misrepresentation of service animals.

There does seem to be a lack of clarity in this bill to whom it applies and what specifically it applies to. A broad interpretation of this bill as above would affect every landlord in the state of Connecticut. A more narrow interpretation, which was suggested to me, was the deductions for service animals are taken into account in the determination of rent for the elderly and disabled in subsidized housing as one of a number of items that are taken into account in rent determinations for subsidized housing and subsidy vouchers. If that is the intention of the bill, then it does not per say have the same effect on landlords. However, the application of HB 6746 needs to be clarified.

Therefore, the CTAA does not support HB 6476 in its current form. HB 6476 in its broad interpretation places significant financial burden on the housing provider to cover the cost of a service animal. The bill also becomes a potential violation of ADA and Fair Housing by the housing provider. It provides no guidance on what type of costs could be deducted from rents or what is an acceptable form of proof of costs for reductions in rent. Additionally, the cost for the apartment must be recouped somewhere. The reduced rent does not happen in a vacuum; this bill could potentially raise costs for other residents/units without a service animal making rents unaffordable for many.

There are alternatives to deductions in rent, i.e. a reduction in tax liability from the State of Connecticut to the affected person. This can be made a separate item from the current allowable medical deductions in Connecticut. The CTAA would like to be part of the discussion as to how to assist elderly and disabled residents impacted by the use of a service animal.

Thank you for the opportunity to speak to on this issue.

Sincerely,