

Municipal Landlord Registries

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Issue

Summarize the requirements of the landlord identification registry that municipalities may establish, including the newly expanded filing requirements for project-based housing providers (PBHPs).

Summary

By law, municipalities may establish landlord identification registries and require certain rental housing providers to file and maintain their residential addresses with them. A new law, <u>PA 19-168</u>, allows municipalities to impose additional filing requirements on landlords who are PBHPs (property owners that contract with the U.S. Department of Housing and Urban Development to rent housing to low-income tenants under the federal <u>Housing Choice Voucher Program (42 U.S.C. § 1437f(o)</u>).

A nonresident owner of a rental property (i.e., a landlord) located in a municipality that has established such a registry must file his or her residential address with the tax assessor, or other municipally-designated office. If the owner is a business entity, such as a corporation or trust, it must file the "agent-in-charge's" residential address instead. The agent-in-charge is the individual who manages and supervises the property and collects rent. (CGS § 47a-6a, as amended by PA 19-168).

Under the new law, PBHPs must additionally identify and provide a residential address for each "controlling participant" associated with the property. The controlling participants are the individuals or entities that exercise day-to-day financial or operational control. If a controlling participant is a business, the PBHP must identify and provide the residential address for a natural person who exercises control over that entity (<u>PA 19-168</u>, §1).

Entities required to file must do so regardless of whether the rental is vacant or occupied. Each filer must provide his or her full residential street address, which cannot be a post office box, and update it within 21 days if the filer moves.

Failing to file or update required information is an infraction and municipalities may establish, by ordinance, penalties of up to \$500 for first violations and \$1,000 for subsequent ones. If the landlord, agent, or PHBP fails to file his or her address, the address to which the tax assessor mails the tax bills for the rental property is considered to be his or her registered address (CGS § 47a-6a and -6b, as amended by PA 19-168).

The state or municipality may serve orders to a landlord, agent, or PBHP's registered address concerning its rental property's (1) maintenance and (2) compliance with state law and local codes. Under the law, if the landlord, agent, or PBHP fails to comply with such an order, service to the address on file is sufficient proof of service in any criminal or civil action arising from his or her failure to comply. The law does not limit the validity of any other means of serving notice of such orders.

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