

# Western Connecticut COUNCIL OF GOVERNMENTS



February 24, 2024

Esteemed Chairs Khan and Moore,  
Members of the Housing Committee:

The Western Connecticut Council of Governments (WestCOG) appreciates the opportunity to comment on Raised Bill 207, *An Act Concerning Housing Authority Jurisdiction*.

WestCOG **opposes** this bill as currently drafted.

WestCOG supports legislation that facilitates intermunicipal collaboration on a range of subjects. This includes housing. However, WestCOG's support is conditional on such collaboration being voluntary and mutual on the part of interested municipalities.

Bill 207 would allow housing authorities, which are created and controlled by municipalities, to expand into other municipalities unilaterally. This is an approach the state has not used – and should not use. Enabling municipal departments and agencies to expand beyond the body politic that governs and funds them, without the mutual agreement of the communities they are expanding into, is a recipe for loss of accountability, service duplication, and conflict.

The approach the state should use for housing is the approach it already uses for public health. State law enables municipalities to unite into regional health districts (CGS chapter 368f). Regional health districts are not created by a local health department unilaterally deciding to expand into other municipalities. They are created when two or more municipalities vote to form a regional health district. The regional health district, in turn, does not just serve its members; it is also governed and funded by them.

Connecticut's regional health districts exemplify sharing – municipalities coming together, voluntarily and driven by data and need, to provide services. The success of the model is demonstrated by its diffusion: over time, the majority of municipalities in Connecticut (130 of 169) have voted to join a regional health district.

Housing is often called a social determinant of health. Given this, WestCOG suggests your Committee replace Bill 207 with language, modeled on state law enabling regional health districts, to allow municipalities to come together voluntarily to form true regional housing authorities.

Should you have questions or require additional information, please do not hesitate to contact me. Thank you for your consideration.

A handwritten signature in black ink that reads "Francis R. Pickering". The signature is fluid and cursive, with a long horizontal line extending from the end of the name.

Francis R. Pickering  
Executive Director