

To: CRCOG Municipal Services Committee

From: Elizabeth Sanderson, Grants Coordinator/Principal Program Manager

Meeting Date: September 9, 2025

Subject: Establishing a Regional Fair Rent Commission Program at CRCOG

Executive Summary

Fair Rent Commissions (FRCs) are municipal administrative agencies that serve as a platform for tenants and landlords to settle complaints over excessive charges. FRCs are unique to Connecticut. They are required for all towns with more than 25,000 residents, although this may soon be extended to additional municipalities. Most commissions have 5-7 members serving on a voluntary basis. FRCs are subject to the Minority Representation Act, which limits the maximum number of members registered to the same political party. Support staff is needed to receive complaints, process them, schedule hearings, and record decisions.

Background

The Fair Rent Commission Act was enacted in 1969 (P.A. 274) and last amended in 2022 (P.A. 22-30), codified in [C.G.S., Sec. 7-148b](#) through 7-148f. Municipalities with a population of 25,000 or more are required to adopt an ordinance that creates an FRC, although any municipality may provide one. As of July 2025, 54 municipalities in Connecticut have FRCs. Each FRC functions as a municipal board that receives and reviews tenant complaints. Unique to Connecticut, FRCs have the primary power to limit or modify rent increases and other rental charges that are determined to be “so excessive, with due regard to all the circumstances, as to be harsh and unconscionable.”

Of CRCOGs 38 Member Municipalities, fourteen must have FRCs, and sixteen provide them. If new legislation expands the requirement to all municipalities, or those with population of 15,000 or more, then more municipalities will need to provide them. In 2024, [HB-5056](#) passed, which allows COGs to perform the required administrative and regulatory activities required for fair rent and fair housing commissions.

Role of an FRC

FRCs conduct studies and investigations, hold hearings, and receive complaints related to rental charges on housing accommodations. They respond to tenant complaints about excessive rent increases and other rental charges. Excessive rents are “so excessive, with due regard to all the circumstances, as to be harsh and unconscionable” and are intended to be reset to an amount that is “fair and equitable.”

Tenant complaints are often resolved in mitigation through informal meetings, without

needing public hearings. Decisions on charges are binding and fully enforceable. An aggrieved party may appeal a decision to Superior Court.

To operate effectively, FRCs require support staff to receive the complaints, analyze complaints, notify parties, schedule and facilitate informal conciliation meetings, schedule and arrange a hearing, post notice of the hearing, prepare meeting agendas, record proceedings, and send out the decision. These staff would primarily function as an intermediary. If a complaint is related to compliance with housing maintenance codes, the municipality's code enforcement division may become involved. Having legal counsel present at FRC hearings may also be beneficial and CRCOG recommends that legal counsel be present at Regional FRC hearings.

Potential Structure of the Regional FRC

CRCOG would administer the FRC, hiring support staff and/or procuring consultants to handle the day-to-day operations and administrative matters. CRCOG would also retain legal counsel to attend hearings and advise the FRC as necessary.

Commission membership varies from 3 to 9 people, with most having 5 to 7. The total number of appointments by town or within the region could be determined with agreement from participating members. Note, the maximum number of members registered to the same political party must not exceed the limit set by the Minority Representation Act (C.G.S. 9-167a). CRCOG staff proposes that the chief elected officials or chief administrative officers of participating member municipalities nominate commission members, with appointments being made by CRCOG Executive Director.

Next Steps in Establishing a Regional FRC

1. Obtain approvals from the legislative body of each municipality and/or COG that will participate in the regional FRC.
2. Adopt an Ordinance. CRCOG drafts the Regional FRC Ordinance, for review and acceptance by the legislative bodies of each participating municipality.
 - At a minimum, the Ordinance must:
 - a) adopt the state Fair Rent Commission Act (C.G.S. 7-148b through 7-148f), either by cross-reference or by copying the text of the state statute into the ordinance;
 - b) identify who will appoint the members of the commission; and
 - c) indicate the number and terms of the commissioners.
 - Detailed ordinances include a comprehensive framework, identifying complaint-filing and hearing procedures, time deadlines, staffing, appeal procedures, and other key factors related to operating an FRC program.
 - Examples of municipal ordinances from across Connecticut are available

[here](#), and a model ordinance is available [here](#).

3. Determine the number of commissioners:
 - Commission membership varies from 3 to 9 people, with most having 5 to 7 members.
 - a) Depending on the number of participating municipalities, CRCOG's FRC could be comprised of one representative from each participating municipality.
 - There is no required balance of landlords, tenants, and homeowners, though most commissions have a mix.
 - The maximum number of members registered to the same political party must not exceed the limit set by the Minority Representation Act (C.G.S. 9-167a).
 - Commissioners do not need to have professional expertise, and their role is to hear cases and apply a standard that is based on fairness and conscionability.
 - Select reasonable terms to avoid the occurrence of vacancies and ensure quorums are met at each public hearing.
4. Appoint commissioners.
 - Appointing authority may be held by the chief executive or legislative body of the government agency primarily responsible for administering the FRC. For CRCOG's FRC, staff proposes that CRCOG's Executive Director appoint commissioners with input from the chief elected officials or chief administrative officers of participating municipalities. CRCOG will conduct a background check of people nominated to serve on the Regional FRC. Appointed members will receive training related to their participation on a government board and an overview of what they can expect related to the FRC specifically.
5. Manage the Program
 - CRCOG Staff are anticipated to perform the following duties: manage the intake of complaints; investigate valid complaints; schedule and facilitate informal meetings to resolve complaints; schedule and facilitate regular public hearings; prepare meeting agendas; advise commissioners; document decisions; communicate professionally with complainants, landlords, consultants, and all other parties involved throughout the process.

Budget and Dues Structure

CRCOG staff anticipates the budget would comprise the following:

- CRCOG Project Manager
- Fees to procure and retain Consultants or staff to administer the FRC:

- a) Service Provider to accept and process complaints.
- b) Legal Counsel
- c) Social Services Provider
- d) Others?

Municipalities that agree to participate in CRCOG's Regional FRC would pay for the program through annual membership dues comprised of a base fee plus an additional fee by population tier (using population data from the 2020 Census):

Tier 1: Population of 0-24,999 (23 municipalities in CRCOG)

Tier 2: Population of 25,000 – 49,999 (10)

Tier 3: Population of 50,000 – 74,999 (4)

Tier 4: Population of 75,000 – 99,999 (0)

Tier 5: Population of 100,000 or more (1)

Future determination of the dues structure could be based on a rolling average (3 to 5 years) of number of complaints / cases handled by the commission.

The bar graph in Attachment #1 depicts 2020 Census total population for each of CRCOG's 38 member municipalities in increments of twenty-five, to match the tiers listed above. CRCOG reserves the right to adjust fees annually following a review of the actual costs associated with managing the program.

Please contact me at esanderson@crcog.org or 860-724-4701 with questions or comments. Thank you.

Attachment:

1. Bar Chart of 2020 Total Population in CRCOG

Municipality	2020 Total Population
Andover	3,151
Avon	18,932
Berlin	20,175
Bloomfield	21,535
Bolton	4,858
Canton	10,124
Columbia	5,272
Coventry	12,235
East Granby	5,214
East Hartford	51,045
East Windsor	11,190
Ellington	16,426
Enfield	42,141
Farmington	26,712
Gastonbury	35,159
Granby	10,903
Hartford	121,054
Hebron	9,098
Manchester	59,713
Mansfield	25,892
Marlborough	6,133
New Britain	74,135
Newington	30,536
Plainville	17,525
Rocky Hill	20,845
Simsbury	24,517
Somers	10,255
South Windsor	26,918
Southington	43,501
Stafford	11,472
Suffield	15,752
Tolland	14,563
Vernon	30,215
West Hartford	64,083
Wethersfield	27,298
Willington	5,566
Windsor	29,492
Windsor Locks	12,613

