## DRAFT FAIR HOUSING GROUP AI IMPLEMENTATION PLAN – FY 2023 6/28/2022

## FY 2022 Highlights

- With support from local governments in the Baltimore region, the Fair Housing Action Center of Maryland:
  - o Refined its paired testing process and recruited 66 new testers, bringing it to a total of 75 trained testers.
  - $\circ$   $\,$  Conducted 10 matched pair tests for source-of-income discrimination.
  - Held 16 trainings on topics such as the HOME Act and disability, reaching more than 100 service providers, community members, and property managers
- BMC Housing Committee continued to be a forum for discussing AI implementation and other key fair housing and housing-related issues, including:
  - Reconvening the BMC's Housing Affordability Preservation Task Force, exploring notification requirements and Year 15 preservation issues related to Low Income Housing Tax Credits.
  - Tackling racial gaps in homeownership
  - o The 2020 Maryland Housing Needs Assessment
  - How Montgomery County eliminated its development moratorium around school capacity.
  - o Baltimore City's Equity in Planning work through its Planning Department
  - Work with the Maryland Dept. of Housing and Community Development (DHCD) around affirmative marketing of Statesupported rental housing.
- The Regional Project-Based Voucher (PBV) Program continued to progress:
  - More than 30 families have leased in the first four developments to be completed: Riverwatch II in Elkridge, Homes at Fountain Green in Bel Air, Robinson Overlook in Columbia, and Town Courts in Annapolis.
  - Program issued two requests for proposals, one in July 2021 and one in March 2022, receiving a total of six proposals requesting a total of 139 vouchers. Only one achieved the threshold for an award, receiving 20 project-based vouchers.
- Fair Housing Group jurisdictions and PHAs submitted joint comments on the development of the 2022 Qualified Allocation Plan, achieving important, but limited results:
  - DHCD kept the five-point incentive for Choice Communities developments and allowed project-based vouchers to count as 30% area median income (AMI) units without onerous and duplicative income verification requirements.
  - DHCD did not expand incentives for metro opportunity areas, as we strongly suggested.
- The Regional Fair Housing Group pursued its priority strategies for tackling racial homeownership gaps:
  - Held six focus groups with housing counseling agencies that included a total of 29 housing counselors. Top barriers
    included resources to put toward a down payment and ongoing mortgage payments as well as lack of available homes at a
    reasonable price.
  - o Conducted an electronic survey of people who have received housing counseling in an effort to buy a home.

- o Compiled a chart with all State and local down payment assistance programs in the Baltimore region.
- Compiled a list of lenders who work with housing choice voucher (HCV) homeownership programs and discussed with PHAs how to boost existing programs and start new ones.
- Learned about a new race-conscious mortgage product being developed by Neighborhood Housing Services-Baltimore in order to narrow Baltimore's racial homeownership gap.
- Working with Maryland DHCD, the Regional Fair Housing Group:
  - Conducted a survey of more than 100 property managers, with the assistance of the Maryland Affordable Housing Coalition, on their needs regarding affirmative fair housing marketing.
  - Explored improvements to <u>www.MDHousingSearch.org</u>, such as automatic population of accessibility features and clearer advance posting of affordability for new properties, to improve it as a clearinghouse for available affordable housing and as an affirmative marketing tool.
  - Received Maryland DHCD data on LIHTC unit occupancy by race; initiated an effort to improve reporting of housing choice voucher use, with 90 percent of that data missing.
- MOU increasing support for housing policy coordination staffing at the Baltimore Metropolitan Council for fiscal years 2021-23 was finalized with last signature.
- BMC has continued to produce a report of regional accomplishments each summer for inclusion in jurisdiction Consolidated Annual Performance and Evaluation Reports (CAPERs).

Contact with questions:

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## Legend

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Regional Action Steps from 2020 Regional AI Implementation Measures & Expected Outcomes

✓ = Completed action/outcome

Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Enhance regional fair housing capacity		l	1	1	
<ol> <li>Continue to support housing policy coordination staffing at BMC to coordinate the implementation of the Action Plan in the 2020 Regional AI and reporting of regional progress through local government Consolidated Annual Performance and Evaluation Reports (CAPERs).</li> </ol>					
Every jurisdiction has signed three-year MOU committing to continued collaboration and to increase their contributions to BMC regional coordination to a total of \$60,000/year beginning July 1, 2020. Update MOU in FY23.	~	~	•		
In addition to ongoing coordination, BMC produces progress report each summer that local governments incorporate into their CAPERs.	~	~	•	•	•
Prepare updated Regional AI/AFH primarily in FY 2024; finish in FY 2025.				•	•
<b>Expected outcome:</b> Strong progress on 2020 AI regional action items and new 2024 or 2025 Regional fair housing analysis with updated action plans for FY 2026-2030					•
<ol> <li>Coordinate regionally to support the new Fair Housing Action Center of Maryland. Ensure systematic paired testing for discrimination, including for Maryland's new law banning discrimination based on source of income.</li> </ol>					
Supported by Baltimore-area local governments, in FY 21, the Fair Housing Action Center (FHAC) conducted 22 matched pair tests for source-of-income discrimination and 11 matched pair and triple tests on lending discrimination. In FY22, FHAC refined its testing process, recruited additional testers, and conducted 10 matched pair tests for source of income discrimination. Also reached seven property managers with online training.	~	<u>~</u>			
Fair Housing Action Center and jurisdictions set goals of 50 paired tests in FY 2023, 75 in FY 2024, and					
100 in FY 2025. Also a goal of two trainings for property managers each fiscal year, reaching at least 50		<u>√</u>	•	•	•
property managers with each training.					
<b>Expected outcome:</b> Robust and regular training of property owners and managers, as well as systematic paired testing around the region to root out discrimination.		▼	•	•	•

**Deleted:** Jurisdictions set training and testing goals in conjunction with Fair Housing Action Center as the Center's capacity becomes clearer.

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Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
<ol> <li>BMC continue to convene local and State housing agencies with housing practitioners and advocates through BMC's Housing Committee to review progress on implementing 2020 Regional AI action steps and strategize on further action.</li> </ol>					
Notable FY21 Housing Committee discussions included sharing information on COVID-19-related rent relief, the Central Maryland Regional Transit Plan, BMC's Baltimore Region Transit Funding and Governance Study, relevant legislation in the 2021 General Assembly, LIHTC award analysis, housing and zoning reforms in Anne Arundel and Howard Counties, AI implementation, tackling racial homeownership gaps, and the 2020 Maryland Housing Needs Assessment.	~				
Notable FY22 Housing Committee work included reconvening the BMC's Housing Affordability Preservation Task Force, including exploring notification requirements and Year 15 preservation issues related to Low Income Housing Tax Credits; devoting two meetings to developing and carrying out priority strategies for tackling racial gaps in homeownership; discussing the 2020 Maryland Housing Needs Assessment; learning how Montgomery County eliminated its development moratorium around school capacity; hearing about the Baltimore City's Planning Department's Equity in Planning work; and working with the Maryland Dept. of Housing and Community Development (DHCD) around affirmative marketing of State-supported rental housing.		<u>×</u>			
<b>Expected outcome:</b> BMC and Fair Housing Group Chair to convene BMC Housing Committee quarterly or as needed on an ongoing basis	~	~	•	•	•
Increase rental housing options					
<ol> <li>Sustain the Baltimore Regional Project-Based Voucher (PBV) Program beyond the initial 2015 HUD seed grant, identifying new funding for the program's operations and contributing vouchers as appropriate.</li> </ol>					
PHAs and BRHP contribute a total of \$60,000/year toward BMC coordination of Regional PBV Program beginning July 1, 2020; update MOU in FY 2023.	~	<u>×</u>	•		
PHAs contributed an additional 43 vouchers to the Regional PBV Program "virtual pool" in summer 2020, bringing the total to 193. We issued a July 2020 request for proposals and awarding an additional 21 vouchers to three opportunity area developments. Unfortunately, none of the three developments were able to move forward due to a lack of Low Income Housing Tax Credits or zoning. Fortunately, other developments were moving forward, and our program was able to help 10 families lease units in one of two developments by June 30, 2021.	~				
Program issued two RFPs in FY 2022, receiving six proposals for 139 vouchers. Only one proposal surpassed the threshold to receive an award, however, for 20 vouchers. As of June 30, 2022, 121 vouchers have been awarded, and 34 units were occupied in the first four developments to be completed.		<u>~</u>			

Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes		FY 2022	FY 2023	FY 2024	FY 2025
<b>Expected outcome:</b> 200 vouchers awarded and 120 units occupied by June 30, 2025. Goals will be revised annually, as needed, based on an evaluation of the adequacy of regional pool of vouchers and resources for counseling	2021	2022	2023	2024	•
<ul> <li>5. Continue to monitor the Maryland Department of Housing and Community Development's (DHCD's) awards of Low Income Housing Tax Credits (LIHTC) and advocate for Qualified Allocation Plan (QAP) policies that: <ul> <li>a. Ensure the Baltimore metropolitan area receives at least 50% of Maryland tax credits awarded, reflecting the Baltimore area's proportion of the State's low income population.</li> <li>b. Award 65% of the region's credits to family developments in opportunity areas in order to address past inequities, while focusing remaining awards in comprehensive revitalization areas.</li> </ul> </li> </ul>					
BMC compiles analysis of DHCD LIHTC awards each year and coordinates Fair Housing Group regional comments to DHCD when DHCD asks for input. Chairs of Fair Housing Group and PHA group help lead effort to compile regional comments. No QAP changes in FY 2021 and no competitive LIHTC round in FY 2022. Comments submitted October 2021, and helpful income-targeting change for Regional PBV Program made in 2022 QAP, but not recommended increase in incentives for metro-area family opportunity developments.	~	*	•	•	•

Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Awards from Maryland DHCD's 2020 9% LIHTC round reached our revitalization goals, but not our opportunity area goals. The graph below shows this has been true in every year since 2011 except 2018. Baltimore City received four awards, including two for the Perkins-Somerset Choice Neighborhoods redevelopment. But the Baltimore area received only seven out of 18 total statewide awards for 444 units, short of our 50% goal of 556. And only three of those seven awards were in opportunity areas, all in Anne Arundel County. The 161 units in those three awards was short of our 32.5% goal of 361.					
Maryland 9% LIHTC Family Oppty Area Awards 2011-20	¥				
<b>Expected outcomes:</b> 9% LIHTC awards FY 2021-2025 include 2300 units awarded in Baltimore region, including 1500 family units in areas of opportunity and 800 units contributing to concerted community revitalization plans					•
<ol> <li>Baltimore-area PHAs see the merit in a regional mobility counseling program and will seriously consider applying for the HUD Mobility Demonstration once the requirements are made known through the HUD NOFA.</li> </ol>					

Action Dian Stone and (chaded) Implementation Maccurac & Evacated Outcomes	FY	FY	FY	FY	FY	
Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	2021	2022	2023	2024	2025	
Application submitted Feb. 1, 2021 requesting 112 additional vouchers and \$4.5 million for mobility- related services and set-up expenses. Proposed six-year regional program involves five PHAs, BMC, and the Baltimore Regional Housing Partnership, and it enrolls a total of 2,168 families with children.	~					
Outcome: We did not receive an award.						
7. Continue to distribute portability educational booklets and show video in all PHA voucher briefings. Conduct an electronic survey of voucher holders who have ported within the metropolitan area in the last two or more years and, where possible, attempted to port in order to identify how much difficulty they may have experienced. Use the findings to develop plans for intra-regional ports moving forward.						
Distribution of portability education booklet and showing of video at voucher briefings ongoing.	•	•	•	•	•	
Administered electronic survey with responses from 18 voucher holders who had recently ported or		<u> </u>				Deleted: By early FY 2022 devise and administer
attempted to port. Results demonstrated overall satisfaction with the porting process						Deleted: of
Expected outcome: Porting survey results analyzed and relevant action taken if needed.		•				Deleted: have
<ol> <li>Through Regional Preservation Task Force, assist local governments in designing affordable housing contracts to facilitate preservation at their expiration.</li> </ol>						Deleted: •
Through March 2022 Housing Committee meeting, began a discussion of how extractive investors can exploit weaknesses in contracts to harm affordability at Year 15 point. Spurred Maryland DHCD-led effort to explore possible improvements to Qualified Allocation Plan (QAP).		<u>×</u>				
Develop model language and identify points of leverage to insist on affordability contracts that will facilitate preservation. Set goals for use.		▼	<u>•</u>			Deleted: •
Track use of such language numbers of contracts that include it.			-	•	•	Deleted: •
Expected outcome: Based on goals set in FY23					•	Deleted: FY22
<ol> <li>Ensure that PHA policies do not have a disparate impact on the ability of persons with disabilities to obtain and maintain housing, offering a reasonable accommodation whenever required.</li> </ol>						
PHAs review their policies by the end of FY <u>2022</u> .	•	•				Deleted: 2021
Expected outcome: PHAs implement any needed changes.		•	•			Deleted: •
10. Ensure that people with disabilities have control in the choice of their service provider by prohibiting leases that require tenants to receive supportive services from the provider operating the housing. Ensure that tenants cannot be evicted or discharged for reasons unrelated to their housing or a breach of their lease.						Deleted: •
PHAs review their policies by the end of FY 2022.		•				
Expected outcome: PHAs implement any needed changes.			•			
Increase ownership opportunities for underrepresented households						

	FY	FY	FY	FY	FY	
Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	2021	2022	2023	2024	2025	
11. Engage lenders in discussions about homeownership and mortgage lending disparities and how						
to address. Seek investments in financial literacy programs (including in schools) and assistance						
in helping subprime loan holders refinance to conventional loans. Develop specific action steps						
to address disparities in the minority homeownership rate.						
Continue conversations with lenders begun through development of 2020 Regional AI. Compiled a list of						
enders who work with housing choice voucher (HCV) homeownership programs and discussed with PHAs how to boost existing programs and start new ones.	✓	<u>√</u> ,				Deleted: •
Engaged Housing Committee at June 2021 meeting. Developed set of priority strategies. Devoted March						
and June 2022 Housing Committee meetings to implementation of those strategies.	✓	<u> </u>				
Held six focus groups with housing counseling agencies that included a total of 29 housing						
<ul> <li>Herd six rocus groups with housing counseling agencies that included a total of 29 housing counselors. Top barriers included resources to put toward a down payment and ongoing</li> </ul>						
mortgage payments as well as lack of available homes at a reasonable price.						
<ul> <li>Conducted an electronic survey of people who have received housing counseling in an effort to</li> </ul>						
buy a home.		<u>√</u>				
<u>Compiled a chart with all State and local down payment assistance programs in the Baltimore</u>		_				
region.						
Learned about a new race-conscious mortgage product being developed by Neighborhood						
Housing Services-Baltimore in order to narrow Baltimore's racial homeownership gap.						
Set goals in FY 2023 based on implementation of early strategies.			<u>•</u>			Deleted: 2022
Expected outcome: Based on goals set in action plan.			•	•	•	Deleted: •
Address barriers to equalizing access to opportunity						Deleted: •
12. Support transformative investments in Racially/Ethnically Concentrated Areas of Poverty						Deleted: •
(R/ECAPs) and similarly highly challenged markets, such as the renewal of State Project CORE						
(Creating Opportunities for Renewal and Enterprise) funding for Baltimore City						
Expected outcome: Local governments, coordinated by BMC, submit letter to governor at appropriate						
time supporting renewal of Project CORE funding for Baltimore City and other appropriate		▼	•	•	•	Deleted: •
transformative investments in R/ECAPs. 13. Support improved public transit access, including for persons with disabilities, to suburban job						
centers and opportunity areas with multifamily housing.						
BMC Housing Committee briefed on BMC's Regional Transit Funding and Governance Study at its March	✓					
2021 meeting.						
BMC use Preservation Database to conduct analysis of concentrations of multifamily housing in areas of			•			Deleted: •
opportunity to inform implementation of Central Maryland Regional Transit Plan.		<b>-</b>				Deleted. •

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Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	2021	2022	2023	2024	2025	
Expected outcome: Seek application of any lessons learned from analysis. Continued engagement by			•	•	•	
housing agencies and stakeholders in regional transit planning process.		▼		-	-	Deleted: •
14. Work with relevant agencies, such as the Maryland Transit Administration (MTA), to explore						
State or regional/federal support for alternatives to public transportation, such as Vehicles for						
Change, Lyft, Uber, etc., ensuring accessibility for persons with disabilities.						
BMC connect Fair Housing Group and Housing Committee to efforts within MTA and/or Baltimore		Γ				
Regional Transportation Board to explore these efforts, as well as any other efforts, such as South			•	•	•	Deleted: •
Baltimore Gateway Partnership.						
Expected outcome: Any appropriate support by local governments for these explorations.			•	•	•	Deleted: •
15. Work with Maryland DHCD to make its data on housing it assists more readily available,	T	Г				
including unit affordability levels, units targeted to persons with disabilities (and how many are						
occupied by persons with disabilities), units occupied by housing choice voucher holders, and						
residents by race and disability.						
BMC facilitated conversations between jurisdictions and Maryland DHCD.	✓					
BMC to submit Public Information Act (PIA) request to Maryland DHCD annually starting summer/fall						
2021, followed by analysis of data from fair housing perspective.		<u>√</u>		-	-	Deleted: •
2021 PIA request showed 90 percent of housing choice voucher (HCV) use missing. Effort to improve		~				
reporting initiated with Maryland DHCD.		<u> </u>				
Expected outcome: Data more readily available & analysis to help guide work with DHCD.			<u>•</u>			Deleted: •
16. Using the latest research, prepare and make available educational materials on the benefits	T	T	Γ	Γ		
that subsidized and accessible housing can bring to all members of vibrant communities.						
BMC staff connected Baltimore County to Dr. Tiffany Manuel (DrT) in FY 2021 regarding her innovative	<ul> <li>✓</li> </ul>	1				
research in this area. <u>Baltimore County began working with DrT more formally in FY 2022.</u>		<u>✓</u>				
Expected outcome: Support jurisdiction and/or private organization in carrying out this action step.		<u> </u>	•	•	•	Deleted: •
17. BMC and Fair Housing Group facilitate meetings of local school district officials and housing						
agency leaders in 3-5 jurisdictions to explore coordinated action to benefit high quality,						
equitable education.						
Expected outcome: 3-5 meetings			•	<u>•</u>		Deleted: •
18. BMC facilitate at least one meeting where jurisdictions either within or outside the region	7	T	Γ	Γ	Γ	
pursuing equity assessments of investments and/or policies can share their methodologies with						
other local governments.						
Expected outcome: Baltimore City presented on their Equity in Planning work at December 2, 2021		~		•	•	
Housing Committee meeting. Further meetings as useful to participants.					-	

Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY	FY	FY	FY	FY	
	2021	2022	2023	2024	2025	
19. Assist the Community Development Network of Maryland (CDN) in convening local government,						
community development organizations, and health care institutions in the Baltimore region to						
discuss the role of housing and community development in those institutions' development of						
their 2022 Community Health Needs Assessments.						
Maryland Citizens Health Initiative presented to August 5, 2021 Housing Committee regarding the 2021		✓				
legislation establishing Health Equity Resource Communities.						
Further meetings as useful.			•	•	•	
Expected outcome: Act on any useful synergies between health care institutions and housing, as					•	
resources allow.						
Expand fair housing resources and compliance						
20. Continue to engage with Maryland DHCD to make www.MdHousingSearch.org an effective:						
a. Clearinghouse of publicly assisted and market-rate rental homes, including homes						
accessible to persons with disabilities,						
b. Affirmative fair housing marketing tool for homes assisted through Maryland DHCD and						
other agencies, and						
c. Viable tool for public housing authorities to refer their housing choice voucher holders,						
including those with disabilities.						
Reiterated request to Maryland DHCD that Md. Housing Search automatically populate accessibility	✓	$\checkmark$				
features based on Fair Housing Act requirements. Response still pending as FY 2022 closes.	•	<u> </u>				
Expected outcome: Automatic population implemented.			•			Deleted: •
Fair Housing Group re-engaged with Maryland DHCD regarding Maryland Housing Search and agreed on	✓					
regular communication and prioritization of improvement for the platform.	•					
New ability to save Md. Housing Search apartment searches and get notices when homes become		✓				
available rolled out fall 2021.		v				
Began monthly calls with Maryland DHCD regarding, implementation of new 2018 working affirmative						Deleted: E
fair housing marketing policy. Continue <u>monthly coordination</u> with DHCD and advocate adjustments as		<u> </u>	•	•	•	Deleted: 's
needed.						
Began to monitor DHCD's requirement of an MOU between DHCD-supported owners and local PHAs						Deleted: to
and mobility programs. First discussions about improving MOUs. PHA point person compiled for DHCD		<u> </u>	•	•	•	Deleted: •
to share with property owners and managers.						Deleted: N
						Deleted: •
Check annually with PHAs and local fair housing stakeholders on accuracy and usefulness of Md.		<u> </u>	•	•	•	Deleten: •

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Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025	
<b>Expected outcome:</b> Md. Housing Search is a reliable, up-to-date database of available apartment homes used by DHCD-assisted property owners for affirmative marketing and by low-income families and PHAs and voucher holders to find affordable places to live.			•			
21. All PHAs offer online rental resources beyond GoSection8.com, including market-rate resources such as Apartments.com and Zillow and, as it becomes more effective, Md. Housing Search.						
PHAs all include additional online rental resources beyond GoSection8.com. Four PHAs currently refer voucher holders to Md. Housing Search.	~	<u>~</u>				
Evaluate Md. Housing Search each year for possible inclusion in rental resources for voucher holders, particularly as Maryland DHCD implements its updated affirmative marketing plans, which include Md. Housing Search.		·	•	•	•	Deleted: •
Expected outcome: All PHAs use a variety of apartment referral tools, including Md. Housing Search	_		•			
22. Review literature on criminal background and subsequent criminal activity – connected to assisted housing, if possible – to see what that research indicates the most justified criminal background standard for assisted housing should be.						
Internet search for studies conducted, revealing only one January 2019 study by Wilder Institute of 10,000 units of affordable housing in Minnesota and Wisconsin – "Success in Housing: How Much Does Criminal Background Matter?" It found no effect for many minor offenses, and that effects reduced to insignificance over 2-5 years for more major offenses	~					
Any needed revisions to PHA criminal background completed.	_	•				
Communicate results to Maryland DHCD, affordable housing developers through Maryland Affordable Housing Coalition, and market-rate property owners and managers through fair housing trainings and other methods			•	•	•	
Expected outcome: Criminal background standard supported by research in place for PHAs and other assisted housing.			•			
23. Conduct a training for local government and public housing authority officials on the duty to affirmatively further fair housing following each State election cycle.						
Discussions initiated, with DHCD very willing to host a training, likely before 2023.	✓					
Expected outcome: BMC and Fair Housing Group to coordinate training in 2023.			•			
<ol> <li>BMC and Regional Fair Housing Group sponsor fair housing trainings for property managers at least twice per year.</li> </ol>						
Fair Housing Action Center held one training specifically for property managers, serving seven.		$\checkmark$				
<b>Expected outcome:</b> BMC and Fair Housing Group to work with Fair Housing Action Center of Maryland to sponsor trainings in spring and fall beginning fall <u>2022</u> ,		▼	•	•	•	Deleted: •
						Deleted: 2021

Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025		
25. Work with Maryland DHCD, fair housing organizations, and HUD Fair Housing and Equal Opportunity (FHEO) to convene affirmative marketing training for the affordable housing industry as well as state and local agencies involved in the financing and/or developing of affordable housing.							
BMC staff worked with DHCD and Maryland Affordable Housing Coalition to conduct an electronic survey of more than 100 property managers to gauge needs for affirmative fair housing marketing training.		<u>×</u>					
<b>Expected outcome:</b> BMC to work with Maryland DHCD and other stakeholders to hold first training in <b>fiscal year 2023</b> and to ensure that effective trainings continue afterwards.		▼	•	•	•	(	Deleted: •
26. Identify the best way (e.g. electronic, paper) to disseminate information regarding fair housing rights and responsibilities to renters, property owners and managers, homebuyers, and real estate agents and then implement that best way.							Deleted: calendar year 2021
BMC and Fair Housing Group to update information in 2014 Fair Housing education booklets in 2022 and explore with fair housing stakeholders whether an online or phone app interface might be more effective than printed booklets to disseminate information.		₹	•				Deleted: 2021 Deleted: •
Expected outcome: Solution implemented by 2023,				•			Deleted: 2022
							Deleted: •