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Final Report: Executive Summary and Action Steps

2020 Analysis of Impediments to Fair Housing Choice in the Baltimore Region

PREPARED FOR:

City of Annapolis and the Housing Authority of the City of Annapolis; Anne Arundel County and the Housing Commission of Anne Arundel County; City of Baltimore and the Housing Authority of Baltimore City; Baltimore County; Baltimore Metropolitan Council (BMC); Harford County and the Havre de Grace Housing Authority; and Howard County and the Howard County Housing Commission

<http://bit.ly/RegionalAI>

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SECTION ES.

EXECUTIVE SUMMARY

Baltimore Regional AI Executive Summary

The Analysis of Impediments to Fair Housing Choice, or AI, is a planning process for local governments and public housing agencies (PHAs) to take meaningful actions to overcome historic patterns of segregation, promote fair housing choice, and foster inclusive communities that are free from discrimination.

This AI was conducted for the Baltimore Region between 2019 and 2020 as a joint effort among the following entities:

- City of Annapolis and the Housing Authority of the City of Annapolis,
- Anne Arundel County and the Housing Commission of Anne Arundel County
- City of Baltimore and the Housing Authority of Baltimore City,
- Baltimore County,
- Baltimore Metropolitan Council (BMC),
- Harford County and the Havre de Grace Housing Authority, and
- Howard County and the Howard County Housing Commission.

In general, this AI follows the template for the Assessment of Fair Housing (AFH) that was created by the US Department of Housing and Urban Development (HUD) pursuant to HUD's 2015 rule on affirmatively furthering fair housing. While following that template is no longer required, our region has a long history of working together to identify and address impediments to fair housing. The participants thought it was important to build upon that history by enhancing the community engagement process and continuing to examine our impediments collaboratively.

The AI is intended to identify barriers to fair housing. By its nature, the document identifies deficiencies in existing practices and problems that remain unaddressed. The fact that the AI is designed to point out areas of improvement is not meant to disparage the efforts made by the jurisdictions individually or the group's collective efforts, which is one of the few multijurisdictional attempts to remedy fair housing in the country.

Community Engagement

The Baltimore Regional AI community participation process resulted in meaningful engagement of nearly 2,800 residents and more than 660 stakeholders acting as part of local organizations, coalitions, private industry, state agencies, and local human rights and planning agencies.

Resident engagement was achieved through a community survey that was distributed primarily to applicants on Housing Choice Voucher waiting lists and to voucher participants in the region. As a result, the survey responses captured input from residents in the region who have the greatest housing needs and are at risk of facing fair housing challenges. Detailed findings from the survey are found in Appendix D.

Stakeholder consultation for the AI was accomplished through a Regional AI Stakeholder Work Group and hearings and meetings at the local levels. In creating the Work Group, the jurisdictions and housing authorities made significant effort to achieve balance by geography, interest, and protected classes. Maryland Commission on Civil Rights Deputy Director, Cleveland Horton, chaired the Work Group, and M&T Bank Administrative Vice President, Charles Martin, served as vice chair. In addition to participating in the Regional AI Stakeholder Work Groups, participating jurisdictions solicited feedback at the local level through hearings and meetings with local constituencies. Section I of the AI discusses the citizen outreach and stakeholder consultation processes in depth.

Primary Research Findings

The Baltimore Region is centered by the City of Baltimore—a city of architectural uniqueness, natural beauty, and strong anchor institutions, including world class universities and medical centers. The greater Baltimore region contains a mix of historic communities, newer suburbs, and rural towns, with a more traditional employment base supported by federal and state governments and related industries. The region is well-positioned to capture economic growth and workforce in the broader Washington D.C.-Baltimore region due to its relative affordability for both businesses and workers, well-developed public infrastructure, and strategic location on the east coast.

The region—and particularly, the City of Baltimore—is also notable for being challenged with a myriad of historical barriers to economic growth in both the public and private sectors for African Americans. These challenges, and their effect on the region and its residents, are the focus of this report.

This report is an update to fair housing analyses that have been conducted regularly in the region. The Baltimore Regional Fair Housing Group was formed in 1996 to coordinate their duty to affirmatively further fair housing under the federal Fair Housing Act of 1968. In 1996, this group created one of the first Regional Analyses of Impediments to Fair Housing Choice (AIs) in the nation and, since that time, it has completed fair housing plans regionally.

Sections III through VIII of this AI present research findings on the barriers to housing choice and economic opportunity in the region. The final section of the report presents an updated regional action plan to address identified barriers.

Primary findings include:

The region remains segregated racially and economically due to past actions that caused and have perpetuated inequities

- Like in many early U.S. cities, growth of heavy manufacturing in Baltimore City, which attracted new African American residents from more southern states and immigrants from abroad, prompted fears of encroachment into surrounding residential areas that were largely occupied by wealthier, White residents. The public sector attempted to implement racial zoning and other actions to promote segregation, and the private sector used deed restrictions toward the same end. Federal regulations that denied financial capital to many protected classes bolstered these local actions. Together, these discriminatory efforts resulted in neighborhoods that became highly segregated by race, ethnicity, and income.
- Many African American residents and other minorities were further denied upward mobility through limits on access to higher education and higher-paying jobs, making them more vulnerable to economic recessions and the overall decline of the manufacturing industry in the late 20th century.
- African American residents in the Baltimore region remain the most segregated of any racial group. While that segregation has decreased modestly as the region has grown economically, African American residents are still by far the most likely to live in neighborhoods with concentrated poverty, and face the largest disparities in educational and health outcomes. In this document's analysis of various "opportunity maps," and demographic patterns, African Americans are the only racial or ethnic group in the region more likely to live in lower opportunity areas than higher opportunity areas.
- Although racial segregation in the region is high, it is not as severe as in Chicago, Atlanta, Milwaukee, Philadelphia, St. Louis, and even nearby Washington D.C.

Housing and economic opportunity is unequally distributed among protected classes

- In the Baltimore region, African American individuals and families face housing needs at higher rates than what would be expected *even after accounting for income*. African American residents are more likely to be homeless and at-risk of homelessness, experience housing cost burden, live in publicly subsidized housing, be denied mortgage loans, and, as a consequence, rent, rather than own their home. For example, in the Baltimore region, Non-Hispanic White households with low incomes have a better chance of getting a mortgage loan approved than African American applicants with moderate to high incomes.
- Severe cost burden—an indicator of extreme housing needs and homeless risk—is nearly twice as high for African American and Hispanic households as for White Non-Hispanic households. It is also higher for single person households than for families.

- Access to quality educational environments varies considerably in the region. School proficiency data suggest that non-Hispanic African American students who attend schools in high-performing suburban districts, namely Howard County and Anne Arundel County, are much more likely to be proficient in reading and math than their counterparts in Baltimore City schools.
- There is a significant mismatch between residents with the greatest needs for employment (e.g., unemployed residents in Baltimore City), the location of jobs (increasingly in the suburban counties), and the time it takes on public transit to access those jobs. Households who are dependent on transit—many of whom are low income African Americans—have access to far fewer jobs than if they had a car. A worker in the region taking transit may access 17,344 jobs through a 30 minute ride compared to 584,586 jobs by car.

The supply of deeply affordable housing remains inadequate overall and also concentrated in portions of the metropolitan area without access to high-performing schools.

- The region has a shortage of nearly 60,000 deeply subsidized units, renting at less than \$500/month, to serve its households with incomes below the poverty level.
- While the implementation of recent voluntary conciliation agreements by the Maryland Department of Housing and Community Development and Baltimore County will increase the supply of affordable housing in higher opportunity areas of the Baltimore region somewhat, the current supply of publicly assisted housing remains skewed toward areas without access to high performing public schools. While nearly half (48%) of the total homes in the region are located in the high opportunity portions of the region identified in the 2014 Regional Housing Plan analysis, only 18 percent of publicly assisted housing units open to families are located in those same areas.
- While recent research has focused on the ability of housing vouchers to enable low income residents to access higher opportunity areas, only 25 percent of voucher holders live in the high opportunity areas identified in the 2014 Regional Housing Plan.
- According to the resident survey conducted for this AI, finding a landlord to accept a voucher remains a challenge, with four in five voucher holders who responded to the survey describing their experience using their voucher as difficult or very difficult. This finding came before the implementation of the recent new “source of income” ordinances in Baltimore City, Anne Arundel County, and Baltimore County. These laws may impact on the ability of voucher holders to find housing.

Continuation of a regional approach can address the region's disparities and help more families thrive in the region's economy.

- The Maryland Department of Planning estimates that the region will add nearly 55,000 jobs between 2020 and 2025. The Baltimore region will continue to be the state's primary place of employment, at 49 percent of all jobs.

- Most of the region’s current jobs—and those in high-growth industries—do not require a college degree, and the majority are not “family supporting.” “Family supporting” is defined as paying at least \$22.28 per hour. Publicly assisted housing will continue to be a critical need to support economic growth, especially for workers in the low-wage industries that are critical for supporting economic development.
- A combined strategy of helping low-income people access the existing high-opportunity areas in the region where jobs are growing, while also making the investments to bring opportunity to economically and racially segregated areas, will link more families with the opportunity of the Baltimore region’s economy and help support that economy.

The AFFH framework focuses on “fair housing issues”—defined as “a condition in a program participant’s geographic area of analysis that restricts fair housing choice or access to opportunity, and includes such conditions as racially and ethnically concentrated areas of poverty, significant disparities in access to opportunity, disproportionate housing needs, and evidence of discrimination or violations of civil rights law or regulations related to housing.”

Fair housing issues differ from “impediments”—the operative term in past AIs—in that they identify the conditions that create barriers to housing choice. Contributing factors align more closely with impediments in that they identify actions of public and private sector actors that create barriers to choice.

The regional action plan to address the challenges identified in this study will focus on the following fair housing issues—and addressing the barriers or “impediments” that continue to exist:

Fair Housing Issue No. 1: A significant shortage of deeply affordable rentals and/or public subsidies in the region, especially in opportunity areas, results in cost burden, overcrowding/doubling up, an increased risk of eviction, a higher risk of homelessness, and a lack of economic opportunity. Although this shortage affects all poverty-level households in the region, African Americans and persons with disabilities are disproportionately likely to experience the negative consequences from this shortage of rental units, both overall and in safe communities with access to high-performing schools.

Contributing factors:

- Continuing and widening wealth disparities,
- Community opposition to affordable housing,
- Limited public subsidies for extremely low income households,
- Limited resources to create needed rental housing, and
- Land use and zoning laws that limit the amount and location of multifamily housing development.

Fair Housing Issue No. 2: Significant differences in attaining homeownership

exist for African American and Hispanic residents, who have significantly lower ownership rates (in the 40-60% range) in all jurisdictions in the region. The lower ownership rates are a result of mortgage loan denials, geographic bias in lending (“lending deserts”), low appraisals in areas with affordable homeownership opportunities, and an inability for households to save for a down payment due to differences in economic status.

Contributing factors:

- Lending discrimination,
- Low home values in neighborhoods suffering disinvestment that then themselves constitute a barrier to new investment.
- Current and increasing wealth disparities,,
- Limited public resources to invest in neighborhoods needing significant revitalization, and
- High land costs, particularly in opportunity areas, due to limits on development opportunities and other factors.

Fair Housing Issue No. 3: Unequal access to economic opportunity exists, fueled by unequal access to high quality schools for children and unequal access to jobs for adults, especially for those relying on public transportation. These differences are greatest for African American residents.

Contributing factors:

- Limited affordable housing in areas with high quality schools,
- Inadequate resources in low performing schools,
- Inadequate educational attainment of many working-age adults,
- Availability, frequency, and access to areas of employment using public transportation, and
- Lack of readily available data on residency of Maryland DHCD-supported housing by race, disability, and voucher status to assist in evaluating how well this housing is addressing this unequal access.

Fair Housing Issue No. 4: Insufficient resources to revitalize high poverty neighborhoods. Revitalization of many of the region’s most challenged neighborhoods requires significant public and private sector support to catalyze redevelopment and to preserve existing affordable housing as redevelopment occurs to mitigate affordable housing loss and resident displacement.

Contributing factors:

- Current and increasing wealth disparities,

- Private disinvestment as evidenced by vacant and abandoned buildings
- Declining federal resources for revitalization.

Fair Housing Issue No. 5: Need for fair housing education and enforcement.

Awareness of fair housing obligations by residents and property owners and vigorous enforcement of those obligations are both critical to ensure that fair housing protections are effective. The new Fair Housing Action Center of Maryland provides a new opportunity for both education and proactive paired testing to enforce fair housing protections.

Approach to Address Barriers

There are many, significant efforts underway in the region to address the challenges identified above—including a well-established regional focus on mitigating fair housing challenges. The aim of this study is to further many of those efforts, strengthen others, and implement new actions.

Prioritization of fair housing issues. Prioritization of the fair housing issues was guided by HUD’s direction in the Assessment of Fair Housing (AFH) rule, as the AI guidance provides less direction on prioritization. In prioritizing the contributing factors to address, highest priority was given to those contributing factors that, for one or more protected classes:

- Limit or deny fair housing choice;
- Limit or deny access to opportunity; and
- Negatively impact fair housing or civil rights compliance.

To that end, the jurisdictions and housing authorities participating in this study propose the action items detailed in the matrices in Section X. In addition to actions specific to each local jurisdiction, high-impact regional actions include:

- 1) Continue to collaborate regionally to address barriers and expand capacity to further housing choice for all protected classes;
- 2) Continue and increase rental housing options through regional mobility efforts to enable choice among voucher holders, and expand affordable, accessible rental housing;
- 3) Advocate for criteria in the Low Income Housing Tax Credit (LIHTC) program that increases affordable and accessible rental stock in areas of opportunity and also catalyzes revitalization;
- 4) Advocate for programs and policies to address homeownership disparities among protected classes;

- 5) Preserve existing housing and mitigate displacement of low income households;
and
- 6) Establish a strong, central fair housing agency.

SECTION X.

FAIR HOUSING GOALS AND PRIORITIES

SECTION X.

Fair Housing Goals and Priorities

This section describes the fair housing goals and priority focus areas for the jurisdictions participating in the 2020 Baltimore Regional AI. It begins with a discussion of fair housing challenges and the “contributing factors” to those challenges. The section ends with the action steps that BMC and each participating jurisdiction will take to address the contributing factors, thereby addressing priority fair housing issues.

Many of the most significant challenges in the region affect demographic groups who experienced historical patterns of segregation, denial of homeownership opportunities (a key component of wealth building in this country), limited access to good quality schools, and discrimination in both employment and housing markets. In the Baltimore region, these residents are also disproportionately likely to be people of color, especially African Americans. Residents with disproportionate needs and limited resources were given the most consideration in crafting fair housing action items.

Fair Housing Issues and Contributing Factors

The AFFH framework focuses on “fair housing issues”—defined as “a condition in a program participant’s geographic area of analysis that restricts fair housing choice or access to opportunity, and includes such conditions as racially and ethnically concentrated areas of poverty, significant disparities in access to opportunity, disproportionate housing needs, and evidence of discrimination or violations of civil rights law or regulations related to housing.”

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disproportionately likely to experience the negative consequences from this shortage of rental units, both overall and in safe communities with access to high-performing schools.

Contributing factors:

- Continuing and widening wealth disparities,
- Community opposition to affordable housing,
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Fair Housing Issue No. 2: Significant differences in attaining homeownership

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Contributing factors:

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- High land costs, particularly in opportunity areas, due to limits on development opportunities and other factors.

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Contributing factors:

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- Lack of readily available data on residency of Maryland DHCD-supported housing by race, disability, and voucher status to assist in evaluating how well this housing is addressing this unequal access.

Fair Housing Issue No. 4: Insufficient resources to revitalize high poverty neighborhoods. Revitalization of many of the region’s most challenged neighborhoods requires significant public and private sector support to catalyze redevelopment and to preserve existing affordable housing as redevelopment occurs to mitigate affordable housing loss and resident displacement.

Contributing factors:

- Current and increasing wealth disparities,
- Private disinvestment as evidenced by vacant and abandoned buildings
- Declining federal resources for revitalization.

Fair Housing Issue No. 5: Need for fair housing education and enforcement. Awareness of fair housing obligations by residents and property owners and vigorous enforcement of those obligations are both critical to ensure that fair housing protections are effective. The new Fair Housing Action Center of Maryland provides a new opportunity for both education and proactive paired testing to enforce fair housing protections.

Approach to Address Barriers

There are many, significant efforts underway in the region to address the challenges identified above—including a well-established regional focus on mitigating fair housing challenges. The aim of this study is to further many of those efforts, strengthen others, and implement new actions.

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- Limit or deny fair housing choice;
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- Negatively impact fair housing or civil rights compliance.

To that end, the jurisdictions and housing authorities participating in this study propose the action items detailed in the matrices that follow.

In addition to actions specific to each local jurisdiction, high-impact regional actions include:

- 1) Continue to collaborate regionally to address barriers and expand capacity to further housing choice for all protected classes;
- 2) Continue and increase rental housing options through regional mobility efforts to enable choice among voucher holders, and expand affordable, accessible rental housing;
- 3) Advocate for criteria in the Low Income Housing Tax Credit (LIHTC) program that increases affordable and accessible rental stock in areas of opportunity and also catalyzes revitalization;
- 4) Advocate for programs and policies to address homeownership disparities among protected classes;
- 5) Preserve existing housing and mitigate displacement of low income households;
and
- 6) Establish a strong, central fair housing agency.

Regional Fair Housing Action Plan

ROW #	REGIONAL ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
Enhance regional fair housing capacity				
1	Continue to support housing policy coordination staffing at BMC to coordinate the implementation of the Action Plan in the 2019 Regional AI and reporting of regional progress through local government Consolidated Annual Performance and Evaluation Reports (CAPERs).	Resources for regional coordination of commitments to affirmatively furthering fair housing choice	Local jurisdictions, BMC	Jurisdictions increase their contributions to BMC regional coordination to a total of \$60,000/year beginning July 1, 2020. In addition to ongoing coordination, BMC produces progress report each summer that local governments incorporate into their CAPERs.
2	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.	Disparities in access to opportunity; private discrimination; lending discrimination; lack of local private fair housing outreach and enforcement; need for resources for fair housing agencies and organizations	Local jurisdictions, BMC	Jurisdictions will set training and testing goals in conjunction with Fair Housing Action Center as the Center's capacity becomes more clear.
3	BMC continue to convene local and State housing agencies with housing practitioners and advocates through BMC's Housing Committee to review progress on implementing 2019 Regional AI action steps and strategize on further action.	Need for regional cooperation and stakeholder involvement in carrying out commitments to affirmatively furthering fair housing choice	BMC, Chair of Fair Housing Group	BMC and Fair Housing Group Chair to convene BMC Housing Committee quarterly or as needed on an ongoing basis.
Increase rental housing options				
4	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.	Disparities in access to opportunity; location & type of affordable housing; resources for regional coordination of commitments to affirmatively furthering fair housing choice	PHAs, BRHP, & BMC	1) PHAs and BRHP contribute a total of \$60,000/year toward BMC coordination of Regional PBV Program beginning July 1, 2020 2) Contribute an additional 50 vouchers in FY 2021. 3) 34 units occupied in FY 2021. 4) 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.

ROW #	REGIONAL ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
5	<p>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:</p> <p>a. Ensure the Baltimore metropolitan area receives at least 50 percent of Maryland tax credits awarded, reflecting the Baltimore area's proportion of the State's low income population.</p> <p>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.</p>	Disparities in access to opportunity; location and type of affordable housing; siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plan and other programs	BMC, local jurisdictions and PHAs	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. Goals for 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.
6	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.	Disparities in access to opportunity	PHAs, BMC	Review HUD NOFA when it is issued and make application decision. Any application would then contain metrics for success if awarded.
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.	Disparities in access to opportunity; potential impediments to portability	PHAs, BMC	Distribution of portability education booklet and showing of video at voucher briefings ongoing. By end of FY 2021 devise and administer electronic survey of voucher holders who have recently ported or attempted to port. Analyze results and take action if they indicate the need.
8	Through Regional Preservation Task Force, assist local governments in designing affordable housing contracts to facilitate preservation at their expiration.	Loss of affordable housing	BMC, legal jurisdictions, PHAs	Develop model language and identify points of leverage to insist on affordability contracts that will facilitate preservation. Track use of such language -- numbers of contracts that include it.
9	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.	Access to publicly supported housing for people with disabilities	PHAs	PHAs review their policies by the end of FY 2021 and implement any needed changes.

ROW #	REGIONAL ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
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.	Access to publicly supported housing for people with disabilities; need for affordable, integrated housing for individuals who need supportive services.	PHAs	Include this topic in PHA policy review to be completed by the end of FY 2021.
Increase ownership opportunities for under-represented households				
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.	Disparities in homeownership rates; access to financial services	BMC	Continue conversations with lenders begun through development of 2020 Regional AI and engage Housing Committee. Develop action plan by end of fiscal year 2021.
Address barriers to equalizing access to opportunity				
12	Support transformative investments in Racially/Ethnically Concentrated Areas of Poverty (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.	Disparities in access to opportunity; deteriorated and abandoned properties; need for significant investment in particular neighborhoods	Local jurisdictions, BMC	Local governments, coordinated by BMC, submit letter to governor at appropriate time supporting renewal of Project CORE funding for Baltimore City and other appropriate transformative investments in RCAPs.
13	Support improved public transit access, including for persons with disabilities, to suburban job centers and opportunity areas with multifamily housing.	Disparities in car ownership; availability, type, frequency, and reliability of public transportation; location of employers	Local jurisdictions, BMC	BMC use Preservation Database to conduct analysis of concentrations of multifamily housing in areas of opportunity in fiscal year 2021 to inform implementation of Central Maryland Regional Transit Plan. Continue to facilitate engagement by housing agencies and stakeholders in regional transit planning process.

ROW #	REGIONAL ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
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.	Disparities in car ownership; availability, type, frequency, and reliability of public transportation; location of employers; access to transportation for persons with disabilities	BMC, local jurisdictions	BMC to connect Fair Housing Group and Housing Committee to efforts within MTA and/or Baltimore Regional Transportation Board to explore these efforts, as well as any other efforts, such as South Baltimore Gateway Partnership. Look for ways local governments can support such explorations.
15	Work with Maryland DHCD to make its data on housing it assists more readily available, 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.	Lack of data to inform fair housing evaluation and decision-making	BMC, local jurisdictions	BMC to facilitate conversations between jurisdictions and Maryland DHCD in fiscal year 2021. Data more readily available by the end of FY 2022.
16	Using the latest research, prepare and make available educational materials on the benefits that subsidized and accessible housing can bring to all members of vibrant communities.	Disparities in access to opportunity; location and type of affordable housing; community opposition	BMC	Identify resources for materials production, conduct local research, and compile videos or other public materials by the end of FY 2021. Disseminate materials FY 2021-25. Reassess and potentially adjust materials in FY 2023.
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.	Disparities in access to educational opportunity	BMC, local jurisdictions	3-5 meetings held by end of FY 2021.
18	BMC facilitate at least one meeting where jurisdictions – either within or outside the region – pursuing equity assessments of investments and/or policies can share their methodologies with other local governments.	Lack of attention/analysis regarding potential impacts of policy and resource decisions on protected classes.	BMC, local jurisdictions	One meeting held by the end of FY 2022. Further meetings as useful to participants.
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.	Impact of housing and community quality on health disparities by protected class.	BMC, CDN, local jurisdictions	One meeting in calendar year 2021, including relevant follow-up. Further meetings as useful.

ROW #	REGIONAL ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
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, and b. Affirmative fair housing marketing tool for homes assisted through Maryland DHCD and other agencies. c. Viable tool for public housing authorities to refer their housing choice voucher holders, including those with disabilities.	Disparities in access to opportunity; quality of affordable housing information programs; access to publicly supported housing for persons with disabilities	BMC, local jurisdictions and PHAs	In FY 2021 revisit pending request to Maryland DHCD that Md. Housing Search automatically populate accessibility features based on Fair Housing Act requirements. Goal of change made by FY 2022. Also in FY 2021, evaluate Maryland DHCD's implementation of new affirmative fair housing marketing policy. Continue to communicate with DHCD and advocate adjustments as needed. Monitor DHCD's requirement of an MOU between DHCD-supported owners and local PHAs and mobility programs. Check annually with PHAs and local fair housing stakeholders on accuracy and usefulness of Md. Housing Search listings so those listings can ultimately replace MOU requirement.
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.	Disparities in access to opportunity; quality of affordable housing information programs; access to publicly supported housing for persons with disabilities	PHAs	PHAs include additional online rental resources immediately. 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.
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.	Disparities in access to opportunity; importance of admissions and occupancy policies and procedures.	BMC, PHAs	Review completed by end of FY 2021; any needed revisions to PHA criminal background completed by FY 2022. In addition, 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.
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.	Capacity building to further jurisdiction commitment to affirmatively furthering fair housing choice	BMC, local jurisdictions	BMC and Fair Housing Group to coordinate training in 2023.

ROW #	REGIONAL ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
24	BMC and Regional Fair Housing Group sponsor fair housing trainings for property managers at least twice per year.	Need for key housing industry personnel to have accurate information on fair housing rights and responsibilities; private discrimination	BMC, local jurisdictions	BMC and Fair Housing Group to sponsor trainings in spring and fall beginning fall 2020.
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.	Lack of effective affirmative marketing plans and execution among assisted housing providers.	BMC, Maryland DHCD	BMC to work with Maryland DHCD and other stakeholders to hold first training in calendar year 2021 and to ensure that effective trainings continue afterwards.
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.	Need for public information on fair housing rights and responsibilities; private discrimination	BMC, local jurisdictions	BMC and Fair Housing Group to update information in 2014 Fair Housing education booklets in 2020 and explore with fair housing stakeholders whether an online or phone app interface might be more effective than printed booklets to disseminate information. Solution implemented by 2021.

City of Annapolis Fair Housing Action Plan

ROW #	CITY OF ANNAPOLIS ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
Expand fair housing resources and compliance				
1	Overall goal: Improve the public's knowledge and awareness of the Federal Fair Housing Act, and related laws, regulations, and requirements to affirmatively further fair housing in the City.	Need to educate members of the community concerning their rights and responsibilities under the Fair Housing Act and to raise awareness, especially for low-income households	Human Relations Commission/ Dept. of Human Resources	
	Continue to make available and distribute literature and informational material, in English and Spanish, concerning fair housing issues, an individual's rights, and landlord's responsibilities to affirmatively further fair housing.	<ul style="list-style-type: none"> ▪ Lack of education and increasing awareness regarding fair housing. ▪ Lack of outreach to protected classes and referral to assistance. 	Human Relations Commission/ Dept. of Human Resources/ Community Development Division	Devise Fair Housing Handbook, a comprehensive, easy to read guide with information about laws, fair lending practices, list of contacts for information and filing complaints. Distribute widely including through agencies that serve low income and protected classes. Create fair housing speakers bureau to conduct outreach with organizations serving the protected classes and low income by June 30, 2024
	Improve information on the Annapolis Fair Housing Law given to landlords participating in the city's rental license program	Lack of knowledge/awareness and willingness to comply with fair housing laws	Department of Planning and Zoning/Licenses and Permits	Prepare and disseminate a Fair Housing Brochure for landlords by December 31, 2020
	Improve language access for the city's non-English speakers, particularly the Latino and Hispanic community	Lack of meaningful language access	Office of the Mayor	Develop a Limited English Proficiency Plan (LEP) and implement recommendations from the LEP Plan by December 31, 2022
	Improve voucher holders' knowledge of the Source of Income protection in fair housing law.	Source of income discrimination	Department of Planning and Zoning/ Community Development Division/HACA	Develop a Handbook for Housing Voucher holders on Source of Income Discrimination in Housing by December 31, 2023

ROW #	CITY OF ANNAPOLIS ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
Expand fair housing choice for persons with disabilities				
2	Overall goal: Revise the City Zoning Code to affirmatively further fair housing.	<ul style="list-style-type: none"> •Occupancy codes and restrictions •Land use and zoning laws 	Department of Planning and Zoning/ Comprehensive Planning Division	
	Improve the City's regulation of group homes for persons with disabilities so not to impede the creation of group homes, limiting housing choice for the disabled in Annapolis.	Regulatory barriers to providing housing and supportive services for persons with disabilities.	Department of Planning and Zoning/ Comprehensive Planning Division	Planning and Zoning should review the existing ordinances and zoning regulations for compliance with the Fair Housing Act, as amended. Revise the definitions and add new definitions for the words: "Family," Handicap (Disabled)," "Fair Housing Act," "Accessibility," "Visitability," "Group Homes". Address during the Comprehensive Plan Process. By June 30, 2025
	Review regulations to ensure the rules are required to support health and safety without potentially impacting protected classes.	Regulatory barriers to providing housing and supportive services for persons with disabilities.	Department of Planning and Zoning/ Comprehensive Planning Division	Change City Code to reflect changes in regulations that negatively impact the health and safety of protected classes by June 30, 2025
Increase rental housing options				
3	Overall goal: Promote and encourage the construction and development of additional affordable rental housing units in the area, especially for households whose income is less than 80% of the median income.			
	Support and encourage by providing incentives to both private developers and non-profit housing providers to develop plans for the construction of new affordable and accessible renter-occupied and owner-occupied housing.	Limited opportunities for residential development/lack of developable land and increasing housing prices	Department of Planning and Zoning/ Community Development Division	Develop a policy regarding Payment in Lieu of Taxes (PILOT) and explore other incentives to encourage affordable housing construction by June 30, 2023

ROW #	CITY OF ANNAPOLIS ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
3	Continue to support and encourage the rehabilitation of existing housing units in the City to become decent, safe, and sound renter occupied and owner occupied housing that is affordable and accessible to lower income households	Lack of access to opportunity due to high housing costs	Department of Planning and Zoning/ Community Development Division	Continue use of CDBG funds and Housing Assistance Trust Fund for Housing Rehabilitation Program and Buyer Program. Leverage public financing to ensure satisfaction of the greatest need among the protected classes. July 1, 2020 - June 30, 2025
Increase ownership opportunities for under-represented households				
4	<p>Overall goal: Improve approval rates for all originated home mortgage loans.</p> <p>Credit history is the greatest reason for denial among all races of households. Debt-to-income ratio is the second highest contributor to denials. Work with lenders and provide resources to assist with reduction of the denial of home mortgage applications based on credit history.</p>	<ul style="list-style-type: none"> •Disparities in homeownership rates •Lending discrimination •Access to financial services 	Department of Planning and Zoning/ Community Development Division	Federal, state, local, and private funding should be used to provide a higher rate of public financial assistance to potential homebuyers in lower income neighborhoods to improve loan to value ratios, so that private lenders will increase the number of loans made in these areas. Support Community Action Agency and ACDS Housing Counseling Programs July 1, 2021- June 30, 2025.

Anne Arundel County Fair Housing Action Plan

ROW #	ANNE ARUNDEL COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
Increase affordable and workforce rental housing options and opportunities for ownership				
1	Invest in the creation of affordable and accessible rental units in Communities of Opportunity, especially in transit zones.	Lack of access to opportunity due to high housing costs	ACDS, Affordable Housing Developers, MD DHCD	Prioritize the investment of federal HOME funding and County general funds into affordable rental units in Communities of Opportunity and transit zones, recognizing that this often requires developers with developable land and other financing commitment.
2	Invest in the preservation of the existing stock of affordable rental units.	Potential loss of affordable housing in future	ACDS, HCAAC, County Council	Provide affordable financing to preserve the existing stock of affordable rental property. Over next five years, invest \$1.5 million in federal and County funds to support the redevelopment of Meade Village Public Housing and Newtown 20.
3	As part of the state-required Housing Element of the County's General Plan, include a housing needs analysis that identifies needs and barriers to affordable housing development.	Land use and zoning laws, Location and type of affordable housing, lack of access due to high housing costs	Planning and Zoning	The GDP, which will be completed by Planning and Zoning and approved by the County Council in Calendar Year 2020, will include a housing needs analysis and strategies for addressing that need.
4	Work to establish an inclusionary housing ordinance that addresses the housing needs identified. Closely monitor the effect of the ordinance and adjust as needed to ensure it creates housing that is needed by residents in the region.	Land use and zoning laws, Location and type of affordable housing, lack of access due to high housing costs	Planning and Zoning, Arundel Community Development Services, Inc. (ACDS), Office of Law	An inclusionary zoning ordinance will be introduced during FY 2020, with a focus on long term affordability for renters earning 50% AMI and below and homeowners earning 100% AMI and below.
5	Also as part of the General Plan update, include an analysis of opportunities to expand the development envelope where logical for the county to absorb new demand for housing (e.g., near transportation corridors and jobs).	Land use and zoning laws, Location and type of affordable housing, lack of access due to high housing costs	Planning and Zoning	The GDP, which will be completed by Planning and Zoning and introduced/approved by the County Council in Calendar Year 2020, will include an analysis of opportunities to expand the development envelope where logical for the County to expand new demand for housing (e.g. near transportation corridors and jobs).

ROW #	ANNE ARUNDEL COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
6	Reinstate and support a policy to give first priority for the use of County surplus land - as suitable- for the development of affordable housing serving 0-60 percent AMI renters and 60-100 percent AMI owners.	Limited development capacity and options	Central Services, Office of Law, ACDS	A workgroup will be convened in 2021 to examine whether or not changes in County code are necessary and what internal policies must be established to implement this policy.
7	Explore a dedicated funding source for affordable housing creation in opportunity areas and redevelopment in target revitalization areas. Until that fund is established, continue allocating County general fund dollars to support affordable housing development.	Disparities in housing challenges; limited development capacity and options	Finance, Office of Budget, ACDS	A workgroup will be convened in FY2021 to analyze potential funding sources, estimate targeted revenue, establish specific goals and introduce and pass legislation.
8	Adopt Small Area Fair Market Rents (SAFMRs) for housing choice voucher (HCV) program.	Disparities in Access to Opportunity	Housing Commission of Anne Arundel County	Implement Small Area Fair Market Rents starting July 1, 2020.
9	Continue and potentially expand housing vouchers created through locally controlled funds that can be used in Opportunity Areas.	Disparities in Access to Opportunity	ACDS	Each year, invest at least \$400,000 in County general funds into approximately 30 tenant based rental assistance to supplement existing federally funded vouchers. Define a policy that establishes rents that will allow for these vouchers to be used in Opportunity Areas.
10	Continue and expand fee waivers for affordable family housing.	Disparities in housing challenges; limited development capacity and options	Office of Law, Planning and Zoning, ACDS	The County will implement the new Workforce Housing legislation, which includes a 50% reduction in water and sewer fees for new affordable workforce housing units built under the law. The County will continue other policies that waive fees for affordable housing development, including waiving water and sewer fees for development serving elderly persons of modest means and waive impact fees for affordable housing developed by nonprofit developers for households earning 120% AMI. The County will explore other fee and regulatory waivers to extend to affordable housing development during FY 2021.

ROW #	ANNE ARUNDEL COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
11	Continue and expand resources for case management, housing search assistance and other supportive services to sustainably house low and very low income households.	Lack of resources to support empowerment of residents faced with discrimination; Discrimination in housing choice	Housing Commission, ACDS	The County will invest at least \$250,000 in County general funds annually into case management and housing location support for housing vouchers administered by HCAAC and TBRA programs funded with CoC, HOPWA, HOME and County funds to house hard to serve clients and help them access housing in Opportunity Areas.
12	Explore development of a landlord mitigation program to encourage wider utilization of housing vouchers in Opportunity Areas and among homeless and special needs families.	Lack of knowledge/awareness and willingness to comply with fair housing laws	ACDS	During FY 2020, raise private funding to establish the program. During FY 2021 develop a program that encourages landlords to enter into an agreement with the program that stipulates that they will waive some requirements- such as rent history, stringent credit requirements, and some criminal background elements- to reach harder to serve clients. In exchange, the program will provide a fund for additional property damage and case management to mitigate the risk.
13	Invest in credit counseling, first time homebuyer counseling and foreclosure prevention counseling to support and increase sustainable homeownership among the protected classes and promote access to better and sustainable rental housing for renters.	Disparities in Homeownership	ACDS	Invest at least \$400,000 annually to support counseling programs that serve at least 600 clients per year. Market these programs to the protected classes.
14	Investigate why there are disparities in minority homeownership rates and develop policies to address those disparities.	Disparities in homeownership	ACDS, Regional Fair Housing Group	In FY 2021, ACDS will develop a survey to reach past HOC clients to identify the causes of these disparities at the local level, as well as examine national and statewide data to better understand current trends in homeownership rates across race. Develop an action plan to help mitigate disparities at the local level in FY 2022.

ROW #	ANNE ARUNDEL COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
15	Explore partnerships with area hospitals and health providers to support both affordable housing and the needed support services for our special needs populations.	Capacity building to further jurisdiction commitment to affirmatively furthering fair housing choice	Department of Aging and Disabilities, ACDS, Health Department, Hospitals	Add hospitals to list of housing and community development stakeholders, and solicit feedback on housing/health needs for Consolidated Plan and Action Plans (FY 2021). Initiate meetings with Anne Arundel Medical Center and University of Maryland Baltimore Washington Medical Center as part of their next Community Needs Assessments (2023?).
16	Enforce the County's new fair housing ordinance, which includes a source of income provision.	Disparities in housing challenges; limited development capacity and options	Human Relations Commission	A local fair housing law with Source of Income was just passed. During FY 2020 and FY 2021 develop a range of trainings and outreach strategies to support education around this effort. During FY2020, appoint qualified members to the Human Relations Commission. During FY2021, establish a process for complaints and enforcement.
Address barriers to equalizing access to opportunity				
17	Continue to invest County and federal resources into neighborhood revitalization areas, including, but not limited to, residential revitalization programs, public services and transportation, developing or redeveloping public facilities, and providing financial coaching/counseling.	Deteriorated and abandoned properties, Need for continued revitalization strategies to give residents a better opportunities in older communities	ACDS	Over the next five years, target limited federal CDBG funds into Severn, Brooklyn Park and Glen Burnie.
18	Implement equity framework in public resource allocation decision making. Allocation of resources should result in an equitable approach to bring neighborhoods into similar standards of service delivery and amenities.	Disparities in Access to Opportunity	Office of Budget, County Executive Office	Explore best practices on how to adopt and implement this practice for FY 2022.

ROW #	ANNE ARUNDEL COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
Expand fair housing resources and compliance				
19	Support fair housing testing, Language Access Planning, diversity in housing and planning boards, investigating housing discrimination, and collaborative efforts with local and regional stakeholders.	Capacity building to further jurisdiction commitment to affirmatively furthering fair housing choice; Disparities in Access to Opportunity	Human Relations Commission, ACDS	ACDS will contract with the Fair Housing Action Center of Maryland to provide testing and follow up with investigations where warranted. ACDS will assess the FHAC's capacity at the end of FY 2021 to determine progress and whether future funds will be allocated. ACDS will collaborate with regional partners to build the capacity of the FHAC or another organization to successfully provide this service. The Human Relations Commission will also investigate discrimination complaints.
Expand fair housing choice for persons with disabilities				
20	Create a home/apartment accessibility modification program to serve low income renters with disabilities. Continue the existing program that serves homeowners.	Discrimination in reasonable accommodation requests; Disparate housing challenges for persons with disabilities	ACDS	Funding was appropriated for this in FY 2020. Develop policies and procedures during FY 2020 and begin implementation. Continue funding and implementation in subsequent years, funding approximately 7-10 modifications per year for homeowners and 7-10 modifications for renters.

City of Baltimore Fair Housing Action Plan

ROW #	CITY OF BALTIMORE ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
1	Create New Affordable Housing Opportunities			
	<p>Production of new publicly subsidized affordable rental housing across a range of geographies, including opportunity area census tracts and non-opportunity areas where the development activity will have a significant revitalizing impact on the area.</p>	<p>Providing affordable units in opportunity areas and in areas where redevelopment is occurring</p>	<p>DHCD in partnership with HABC</p>	<p>1,250 new rental units created over 5 years, primarily through new construction. These units will be developed using a range of resources such as tax credits and HOME program and Baltimore City Affordable Housing Trust funds. For some units, project based vouchers will help support project development. At least half of these units will be developed in opportunity areas. The remainder will be developed as part of publicly supported transformative revitalization projects, or in areas which are clearly gentrifying and public investment is required to ensure that rental units remain available for lower income households. The City recognizes the need to avoid over concentration of affordable rental housing and will not support projects that do so unless they are part of projects that are of a scale and breadth to be transformative to the area in which they are built.</p>
<p>Reform the Inclusionary Housing Law (IHL) so that it more effectively produces affordable housing opportunities.</p>	<p>Providing affordable units in opportunity areas and in areas where redevelopment is occurring</p>	<p>DHCD</p>	<p>Stop the imminent sunseting of the IHL and extend its time of operation two years during which consultant services will be procured to provide an assessment and evaluation of the Law; make recommendations to improve its effectiveness; suggest legislative improvements and revise program guidelines and processes by which the law is implemented. Before the end of the two year period the consultant recommendations will be implemented.</p>	

ROW #	CITY OF BALTIMORE ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
1	Continue using HOME Investment Partnerships Program, Low Income Housing Tax Credits and other City of Baltimore and Housing Authority of Baltimore City resources in the production wheelchair accessible affordable housing for persons with disabilities in-excess-of the minimum amount required by federal regulation to replace UFAS units lost from the affordable housing inventory.	Providing affordable accessible housing	DHCD in partnership with HABC	DHCD will supplant the 5% accessible units required by Section 504 of the Rehabilitation Act with a 7% rate.
	Continue to foster homeownership opportunities for under-represented households.	Addressing disparities in homeownership	DHCD & HABC	DHCD will provide down payment and settlement payment assistance to over 1,100 low income households over the CFY 2021 through CFY 2025. HABC, through its Housing Choice Voucher ("HCV") homeownership program, will assist at least 50 participants in the HCV program in becoming homeowners.
	Design and implement requirements governing mixed income tenancy in new developments receiving City financial support.	Providing affordable units in opportunity areas and in areas where redevelopment is occurring	DHCD	The City will, before the end of the five-year period covered by this AI, design and implement requirements that all new projects of more than twenty units that receive City financial support have market rate and publicly subsidized units in them.
	Continue to support homeownership counseling, both purchase and default, for under-represented households.	Addressing disparities in homeownership	DHCD	Fund homeownership counseling - pre-purchase, home-buying and foreclosure prevention and mitigation - for 3,000 households with incomes less than 80% of AMI per year for five years beginning with CFY 2021.
	Implement a Healthy Opportunities Program ("HOP"), which will be a mobility program that will assist families with children who are currently participants in HABC and where one or more family member has a medical condition, such as asthma, that is exacerbated by environmental factors. Housing and health-care providers will collaborate to provide stable, affordable and healthy housing in opportunity areas with the goal of improving participants' health outcomes and overall quality of life.	Disparities in access to housing in areas of opportunity & health disparities	HABC; BCHD	<ol style="list-style-type: none"> 1. Establish the program within one year. 2. Assist up to 150 current participants in the HCVP receive mobility counseling and assistance with moving to opportunity areas during a 2-year period.

ROW #	CITY OF BALTIMORE ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
1	Assist persons with disabilities in leasing units with the 27 Mainstream vouchers HABC received under the CARES Act	Integrated housing for persons with disabilities	HABC	27 persons with disabilities leasing units with Mainstream vouchers by 7/30/2021.
	If HUD issues a NOFA for Mainstream vouchers, HABC will consider applying for the vouchers depending on whether HABC is eligible and the NOFA requirements.	Integrated housing for persons with disabilities	HABC	The award and issuance of Mainstream vouchers in accordance with NOFA requirements.
2	Promote Affirmative Fair Housing Marketing			
	Ensure that HOME funded developers create and implement meaningful affirmative marketing plans	Addressing residents' lack of knowledge/awareness of newly constructed affordable housing in opportunity areas. Addressing marketing plans that do not market to communities unlikely to know about the housing opportunity.	DHCD	HOME agreements will contain affirmative marketing plans and their implementation will be enforced as part of the contract compliance process for all HOME projects. In CFY 2021 HOME compliance documents will be revised to better document review and assessment of marketing plans.
3	Preserve Existing Affordable Housing			
	Preservation of existing publicly subsidized affordable rental housing in any area in which improvements will significantly extend the amount of time housing units will remain a viable part of the city's publicly subsidized affordable housing inventory.	Preventing displacement of residents due to economic pressures; loss of affordable housing.	DHCD & HABC	HABC will preserve to 2,078 units via the Rental Assistance Demonstration (RAD) Program during the July 2020 - June 2025 period this AI is anticipated to be in force. These units are in addition to the 3,745 preserved through the end of 2019. The new RAD units will include the replacement of the 629 Perkins Homes public housing units via the Perkins, Somerset, Old Town Choice Neighborhoods redevelopment project. DHCD anticipates preserving 400 units of existing subsidized affordable housing over the same time period.
	In housing markets that are experiencing, or likely to experience, demographic changes that will significantly erode the availability of unassisted affordable rental and for-sale housing: 1. Design and implement, initially on a pilot basis, a program to preserve affordable rental housing. 2. Assist existing homeowners remain in their homes.	Preventing displacement of residents due to economic pressures.	DHCD	DHCD's initial pilot will focus on up to 15 units. The results of the pilot, if successful, will be used to develop a program to scale.

ROW #	CITY OF BALTIMORE ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
4	<p>Support Racially Integrated Communities</p> <p>Define and identify such areas and analyze and report on their social and physical characteristics.</p> <p>As appropriate, design and implementation of strategies that will strengthen these areas and maintain and improve their racial integration.</p>	<p>Preventing racially integrated communities from becoming segregated.</p> <p>Preventing racially integrated communities from becoming segregated.</p>	<p>DHCD</p> <p>DHCD</p>	<p>Complete demographic & geographic studies in the first year of the five year period - July 2020 through June 2025 - that is anticipated this AI will be in force.</p> <p>Following the completions of the geographic and demographic studies in the action step found above, strategies to strengthen these areas will be designed and implemented over the remainder of the five year period - July 2020 through June 2025 - that it is anticipated this AI will be in force. Specific strategies will be developed in concert with the persons who live in these neighborhoods and could include housing counseling and homeownership incentives specific to integrated neighborhoods as well as setting up a marketing and promotion program based on Chicago's Oak Park model. Regardless of the specific strategies decided on, the City will, likely working with non-profit partners, take actions to improve the physical and social infrastructure in these neighborhoods.</p>
5	<p>Community Planning, Support, and Coordination</p> <p>Work with the Baltimore City Department of Planning to support residents in all types of communities in creating comprehensive, transformative revitalization plans focused on development without displacement.</p>	<p>Addressing lack of community revitalization strategies; preventing displacement of residents due to economic pressures.</p>	<p>Department of Planning, DHCD</p>	<p>During the five year period - July 2020 through June 2025 - that it is anticipated this AI will be in force, a minimum of ten community plans will be created and implemented.</p>

ROW #	CITY OF BALTIMORE ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
5	As part of such plans, support a wide range of viable community-based affordability preservation and wealth-building tools, such as community land trusts, tax credits, housing counseling, and homeownership incentives, where appropriate.	Addressing lack of community revitalization strategies; addressing deteriorated and abandoned properties; addressing lack of public and private investments in specific neighborhoods including services or amenities; addressing lack of access to financial services; preventing displacement of residents due to economic pressures.	Department of Planning, DHCD	Support the development of community land trusts as a source of affordable housing production. As noted above, 15,000 low-income households will receive housing counseling and 1,000 will receive incentives to become homeowners. Planning Department staff will work with dozens of community based organizations to implement community plans over the course of the five year period it is anticipated this AI will be in force.
	Work with other City and quasi-City agencies (e.g. Police Department, Safe Streets, Health Department, Baltimore Development Corporation, Housing Authority of Baltimore City, Mayor’s Office of Employment Development) to coordinate investments and activities so that community revitalization efforts include improved education, public safety (including consistent, constitutional policing and violence interrupter activity), public health, and economic opportunities.	Addressing location of employers, access to financial services, public safety, proficient schools, public health.	City and quasi-City Agencies	Using recent multiple partner collaborative efforts, such as the Middle Market Inter-Agency Working Group, and the block-by-block redevelopment strategies that DHCD, the Planning Department and community partners have undertaken over the past year to implement the Neighborhood Framework, as models, a formal structure will be established through which City and quasi-City agencies collaborate and coordinate community planning efforts and actions. The purpose of this entity would be to integrate housing, health, public safety, infrastructure, education and economic objectives into planning and implementing community development initiatives and projects. This entity will be up and running within eighteen months of the release of the new AI. At least two major revitalization projects that involve inter-agency coordination and include new or rebuilt schools, community recreational facilities and new housing or large scale housing rehabilitation will be initiated and completed under the five-year period covered by this AI.

ROW #	CITY OF BALTIMORE ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
6	Support Fair Housing Access and Expand Resources and Compliance in the City			
	Support creation of a fair housing agency that will conduct fair housing testing and training, investigate housing discrimination and pursue fair housing claims.	Addressing local private fair housing outreach and enforcement	DHCD	Support the operations of the new Maryland Fair Housing Action Center (MFHAC) to conduct fair housing training and testing and investigate claims of housing discrimination throughout the Baltimore region. Training about, testing and investigation of, the State's new Source of Income Law will be part of the contractual obligations undertaken by the MFHAC.
	Continue implementation of Language Access Planning.	Addressing meaningful language access	All City Agencies	All City agencies will develop new LAP plans in the first two years this Regional Analysis of Impediments is in force.
	Create a partnership between the DHCD, HABC, Department of Planning, Health Department, Maryland Commission on Civil Rights, and the Office of Equity and Civil Rights, the City's fair housing compliance agency.	Capacity building to further compliance with fair housing laws	DHCD, HABC, Planning, Health, MCCR, OECR	OECR will initiate quarterly meetings of the participating organizations; Capture demographic data on fair housing issues from each agency
	Continue to enforce Article IV of the Baltimore City Code, the City's fair housing law by investigating fair housing complaints.	Complaints of housing discrimination	OECR	OECR received 225% more housing discrimination complaints in FY19 (14 complaints) than in FY18 (4 complaints) due to HUD FHIP-EOI funding. OECR estimates it will investigate 20 complaints of housing discrimination per year for a total of 100 over the course of five years.
	Continue to apply for HUD FHIP-EOI Funding.	Lack of resources to create a robust fair housing program	OECR	Continue to utilize HUD funds already awarded in FY20 for the time period of September 1, 2020 to August 30, 2021 to build a robust FHIP EOI program; Apply for additional FHIP-EOI funding in subsequent years.
	Implement a comprehensive Fair Housing Education and Outreach training program.	Lack of knowledge of fair housing laws and resources	OECR	OECR will provide fair housing training in FY20 to 200 residents and 50 housing professionals. Pending future HUD-FHIP funding, OECR will continue to train residents and housing professionals annually with a goal of training 250 individuals per year. All training is free of charge to residents and will be conducted across the City to address issues of access to certain communities.

ROW #	CITY OF BALTIMORE ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
6	Provide educational fair housing literature to residents.	Lack of knowledge of fair housing laws and resources`	OECR	OECR will create a comprehensive housing resource guide in FY20 that will be distributed to 250 residents. The resource guide will also be available on OECR's website. Additionally OECR will distribute five topic-specific fair housing brochures, which will also be available on OECR's website. Pending future HUD-FHIP funding, OECR will continue to distribute printed literature annually. All materials are free of charge to residents.
	Address language access in fair housing education	Lack of educational materials and training available in other languages.	OECR	OECR will provide in-person fair housing training to 25 individuals in FY20 in Spanish. All five of OECR's fair housing topic-specific brochures will be available in Spanish, Mandarin, and Korean. OECR will also have materials translated to Braille in FY20. All translated brochures will be available on OECR's website. Pending future HUD-FHIP funding, OECR will also have materials translated into Arabic and French. All materials are free of charge to residents.
	Address accessibility in fair housing education	Lack of access to in-person fair housing training.	OECR	OECR will provide five virtual fair housing educational videos in FY20 that can be viewed at home. OECR will also premiere these videos on a live virtual platform to allow for questions from viewers at home. Pending future FHIP funding, OECR will continue to provide virtual training. All training is free of charge to residents. Educational videos are subtitled. Subtitles are in English, Spanish, Mandarin, and Korean.
	Provide education around the City's Source of Income Protections	Lack of knowledge around the City's recently passed Source of Income (SOI) protections	OECR, HABC	Partner with HABC to create education and outreach plan on fair housing compliance regarding SOI to voucher holders and landlords/housing professionals in FY20. In FY 2021, rollout education and outreach plan.
	Explore amending Article 4 of the Baltimore City Code to be substantially equivalent to the Fair Housing Act	Strengthen current resources to create a robust fair housing program	OECR	Work with the City Council to draft language of amendment, write a letter of support, and encourage others to write letters of support of such an amendment.

ROW #	CITY OF BALTIMORE ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
6	Explore amending Article 4 to require landlords and housing professionals to accept TIN#s in the place of SSN	Lack of opportunities for immigrants and refugees to access safe and affordable housing	OECR	Work with the City Council to draft language of amendment, write a letter of support, and encourage others to write letters of support of such an amendment.
	Address language access in fair housing education.	Lack of educational materials and training available in other languages.	OECR	OECR will provide in-person fair housing training to 25 individuals in FY20 in Spanish. All five of OECR's fair housing topic-specific brochures will be available in Spanish, Mandarin, and Korean. OECR will also have materials translated to Braille in FY20. All translated brochures will be available on OECR's website. Pending future HUD-FHIP funding, OECR will also have materials translated into Arabic and French. All materials are free of charge to residents.
	Address accessibility in fair housing education.	Lack of access to in-person fair housing training.	OECR	OECR will provide five virtual fair housing educational videos in FY20 that can be viewed at home. OECR will also premiere these videos on a live virtual platform to allow for questions from viewers at home. Pending future FHIP funding, OECR will continue to provide virtual training. All training is free of charge to residents. Educational videos are subtitled. Subtitles are in English, Spanish, Mandarin, and Korean.
	Provide education around the City's Source of Income Protections	Lack of knowledge around the City's recently passed Source of Income (SOI) protections.	OECR, HABC	Partner with HABC to create education and outreach plan on fair housing compliance regarding SOI to voucher holders and landlords/housing professionals in FY20. In FY 2021, rollout education and outreach plan.
	Explore amending Article 4 of the Baltimore City Code to be substantially equivalent to the Fair Housing Act.	Strengthen current resources to create a robust fair housing program.	OECR	Work with the City Council to draft language of amendment, write a letter of support, and encourage others to write letters of support of such an amendment.
	Explore amending Article 4 to require landlords and housing professionals to accept TIN#s in the place of SSN.	Lack of opportunities for immigrants and refugees to access safe and affordable housing.	OECR	Work with the City Council to draft language of amendment, write a letter of support, and encourage others to write letters of support of such an amendment.

Baltimore County Fair Housing Action Plan

ROW #	BALTIMORE COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
Goal 1	Establish over-arching fair housing policy to establish a foundation for affirmatively furthering fair housing.	All impediments: Limited land dedicated to affordable residential housing development; need for ongoing funding and commitment to increase housing supply to accommodate need for affordable and workforce housing; Potential for increased concentration of protected classes in low opportunity areas without expanded multifamily development envelope; Limited information for residents on fair housing rights and housing opportunities, need for expanded fair housing outreach and education; and Neighborhood resistance to accommodating a diversity of housing choices		
Task 1	Ensure that there is a statement of policy in Master Plan 2020 and the Zoning Regulations that clearly articulates the County's commitment to expanding fair housing choice.	<ul style="list-style-type: none"> • Land use and zoning laws 	Department of Planning	Since the election of the new County Executive, the Source of Income legislation, known as the "Home Act", was successfully passed in November 2019. Any policy updates to Master Plan 2020 and the Zoning Regulations have been taken under advisement and are subject to further review. Provisions from the County's newly adopted "Home Act" will be included as an update to Master Plan 2020.
Task 2	Incorporate AFFH principles, including provisions to expand the locations available to multi-family housing, into any future substantial revisions to the zoning map.	<ul style="list-style-type: none"> • Land use and zoning laws • Community opposition 	Department of Planning	The County is exploring development of potential strategies as solutions to this task. The current year 2020 is the time for review of the County's Comprehensive Zoning Map Process (CZMP).
Task 3	Adopt an inclusionary housing ordinance that can be incorporated into the County's development codes.	<ul style="list-style-type: none"> • Occupancy codes and restrictions • Community opposition • Lack of state or local fair housing laws 	Department of Planning	The County will explore development of potential strategies as solutions to this task.

ROW #	BALTIMORE COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
Task 4	Revise policy priorities for the investment of HOME and CDBG funds to promote projects invoking rental housing for families on sites outside of racially/ethnically concentrated areas.	<ul style="list-style-type: none"> • Community opposition • Lack of access to opportunity due to high housing costs • Location and type of affordable housing • Location of accessible housing • Availability of affordable units in a range of sizes 	Department of Planning	The County continues to use HOME and CDBG funds to increase access to homeownership, and maintain while increasing housing for low-to-moderate income households.
Task 5	Track data showing the number of affordable housing created by household type (senior, family, large family, accessible) and by areas of opportunity and areas of racial and ethnic concentrations. To the extent possible, monitor occupancy of assisted units by protected class.	<ul style="list-style-type: none"> • Lack of access to opportunity due to high housing costs 	Department of Planning	Since 2016 the County has tracked data of affordable housing developemtns financed by VCA funds. The rental occupancy data of these units have continued to be reported to the Complainants and HUD on a monthly basis.
Task 6	Prioritize for participation in the Mobility Counseling Program, HCV applicants and participants who are families residing in census tracts that have been identified as areas of African-American racial concentration in the County's 2011 Analysis of Impediments and the 2019 Regional Assessment of Fair Housing.	<ul style="list-style-type: none"> • Lack of access to opportunity due to high housing costs • Availability of affordable units in a range of sizes 	Office of Housing	The Office of Housing implemented the Mobility program in 2016 to assist families with relocation to areas of opportunity.
Task 7	Reduce barriers to development or financial assistance for workforce and affordable housing developers	<ul style="list-style-type: none"> • Community opposition • Lack of access to opportunity due to high housing costs • Location and type of affordable housing • Location of accessible housing • Availability of affordable units in a range of sizes 	Department of Planning	The County meets with developers on a consistent basis to critique development plans and explore creative development strategies. Developers are briefed on the development process and pertinent requirements such as affirmative marketing, workforce development, DHCD QAP, Law Department and other relevant issues.

ROW #	BALTIMORE COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
Goal 2	Amend policy and program documents to affirmatively further fair housing.	Potential for increased concentration of protected classes in low opportunity areas without expanded multifamily development envelope and Limited information for residents on fair housing rights and housing opportunities; need for expanded fair housing outreach and education		
Task 1	Revise the County's HOME policies to remove potential impediments to the creation of rental units in non-concentrated areas, particularly the requirement that developers acquire assistance.	<ul style="list-style-type: none"> • Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs. 	Department of Planning	In the 2016 publication, "A Guidebook for Developers Requesting Development Financing and Assistance", the County's HOME policies revision removed the requirement "that developers require assistance". Any reference requiring County Council support to initiate the development or funding processes for affordable rental housing was deleted.
Task 2	Revise a written policy that encompasses the Site and Neighborhood Selection requirements at 24 CFR 983.6 (Project-Based HUD VASH vouchers), incorporate these requirements into the County's HOME written agreements, distribute as part of application package.	<ul style="list-style-type: none"> • Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs. 	Department of Planning	The Department of Planning revised its loan agreements to incorporate the Site and Neighborhood Selection requirements at 24 CFR 983.6 accordingly.
Task 3	Amend the affirmative marketing standards so that the County is responsible to devise the standards by which the effectiveness of affirmative marketing efforts for each project will be judged.	<ul style="list-style-type: none"> • Lack of local public fair housing enforcement • Lack of state or local fair housing laws 	Department of Planning	In accordance with the regulations of the Department of Housing and Urban Development (HUD), and in furtherance of Baltimore County's commitment to non-discrimination and equal opportunity in housing, the Department of Planning has developed a standard for the development of affordable housing in its 2017 Affirmative Fair Housing Marketing Plan. Also, certain Baltimore County-funded development projects are required to submit a Conciliation Agreement Marketing Plan (CAMP) that must be reviewed and approved by HUD FHEO. After which 30 days of affirmative marketing must take place prior to leasing.

ROW #	BALTIMORE COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
Task 4	Ensure that the HOME written agreements for developers encompass federal site and selection requirements	<ul style="list-style-type: none"> Lack of local public fair housing enforcement 	Department of Planning	Federal and state requirements are included in HOME written agreements with developers.
Goal 3	Increase access to County programs for persons with limited English proficiency.	Limited information for residents on fair housing rights and housing opportunities; need for expanded fair housing outreach and education		
Task 1	Complete four-factor analysis of needs and language access plan according to HUD's LEP guidance.	<ul style="list-style-type: none"> Lack of meaningful language access 	Office of Housing	The Office of Housing publishes its language access plan annually. The Department of Planning published the 2015 Language Access (LAP) Plan. Both agencies continue to take reasonable steps to ensure meaningful access to LEP persons per HUD guidance.
Task 2	Update the Section 8 Administrative Plan to include the policy determinations resulting from the four-factor analysis.	<ul style="list-style-type: none"> Lack of meaningful language access 	Office of Housing	The Office of Housing's Administrative Plan includes policy determination derived from the four-factor analysis.
Task 3	Continue to provide language services (interpreters, translators, etc.) on an as-needed basis.	<ul style="list-style-type: none"> Lack of meaningful language access 	Office of Housing	Both the Office of Housing and the Department continue subscriptions to Language Line services taking reasonable steps to ensure meaningful access to LEP persons per HUD guidance.
Goal 4	Ensure that members of the protected classes are represented on housing-related boards and commissions.	Limited information for residents on fair housing rights and housing opportunities, need for expanded fair housing outreach and education; and Neighborhood resistance to accommodating a diversity of housing choices		
Task 1	Survey current board members on a voluntary basis to document race, gender, ethnicity and disability status.		Department of Social Services Board	The Department of Social Services Board is currently comprised of members of protected classes and continues to affirmatively recruit members of the protected classes. In alignment with the Baltimore County Enterprise Strategic Plan 2019 to 2022, the County plans to develop, implement and maintain a comprehensive plan and recruitment strategy to increase diversity in housing-related boards and commissions membership.

ROW #	BALTIMORE COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
Task 2	Affirmatively recruit protected class members to fill vacancies on appointed boards and commissions.		Diversity, Inclusion and Equity Community Advisory Council	The Commission on Disabilities and Human Relations Committee continue to affirmatively recruit members of protected classes. In November of 2019 the newly elected County Executive in established the Diversity, Inclusion and Equity Community Advisory Council advocates for, engages in and responds to issues, concerns and needs of County residents as it relates to diversity, inclusion and equity. The Community Council's responsibilities include providing advisement to, and working collaboratively with, the Chief Diversity and Inclusion Officer on specific community diversity, inclusion and equity issues.
Task 3	Encourage the Greater Baltimore Board of Realtors (GBBR) to maintain data demonstrating the number of Realtors who are members of the protected classes to ensure that local Realtors reflect the County's diversity.	<ul style="list-style-type: none"> • Lack of diversity reflected within private Realtor community • Real estate sales discrimination • Lack of local private fair housing outreach and enforcement • Lack of resources for fair housing agencies and organizations 	Diversity, Inclusion and Equity Community Advisory Council	The County will explore opportunities for its Human Relations Committee to engage with Education and Equal Opportunities Committees of Greater Baltimore Board of Realtors (GBBR); as well as The National Association of Real Estate Brokers (NAREB) Real Estate Brokers of Baltimore and The National Association of Hispanic Real Estate Professionals (NAHREP) Maryland Greater Capital.
Goal 5	Increase the supply of housing affordable to households below 80% MHI, specifically in opportunity areas.	Potential for increased concentration of protected classes in low opportunity areas without expanded multifamily development envelope		
Task 1	Increase the Section 8 payment standard for higher-cost areas in the County as a means of expanding fair housing choice outside of racially/ethnically concentrated areas.	<ul style="list-style-type: none"> • Lack of access to opportunity due to high housing costs • Availability of affordable units in a range of sizes 	Office of Housing	The Office of Housing reviews payment standards annually to ensure Housing Choice in areas of opportunity.

ROW #	BALTIMORE COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
Task 2	Expand incentives for property owners and investors to build new apartment buildings or substantially rehabilitate existing buildings for occupancy by lower-income families, specifically in areas of opportunity.	<ul style="list-style-type: none"> • Lack of access to opportunity due to high housing costs • Lack of private investments in specific neighborhoods • Lack of affordable, accessible housing in range of unit sizes • Location and type of affordable housing • Deteriorated and abandoned properties • Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs. • Regulatory barriers to providing housing and supportive services for persons with disabilities. 	Department of Planning	The County continues to work with developers/property owners and has been successful in creating new multifamily and scattered site properties throughout the County. The County recently passed legislation to eliminate impact fees for affordable housing projects.
Task 3	Exempt affordable housing (not only senior housing or housing to assist homeless) from Adequate Public Facilities Ordinance (APFO).	<ul style="list-style-type: none"> • Community opposition • Location and type of affordable housing • Location of employers • Location of proficient schools and school assignment policies • Location of accessible housing Lack of community revitalization strategies • Lack of public investments in specific neighborhoods, including services or amenities • Availability, type, frequency, and reliability of public transportation • Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs. • Regulatory barriers to providing housing and supportive services for persons with disabilities. 	Department of Planning	The Baltimore County Council passed an ordinance imposing impact fees on new development in Bill 16-19, Development Impact Surcharge and Fee. The Bill provides a credit to the impact fee for affordable housing units. To ensure that residents of affordable housing live in a safe and healthy neighborhood with the same characteristics as other neighborhoods in opportunity areas, waivers should not be given to affordable housing developments from adequate public facility ordinances. Schools should not be overcrowded, constrained water and sewer service should not impact residents, traffic should not be burdensome to residents.

ROW #	BALTIMORE COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
Task 4	Implement fast track development approval and fee waivers for affordable and mixed income developments of all types (e.g., cannot be only senior complexes that receive benefit).	<ul style="list-style-type: none"> • Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs. • Regulatory barriers to providing housing and supportive services for persons with disabilities. • Land use and zoning laws • Occupancy codes and restrictions 	Department of Planning	The County has implemented some fast track development systems for approvals and incentives for all types of developments. The County recently passed legislation to eliminate impact fees for affordable housing projects.
Task 5	Initiate conversations between housing and school officials to explore possible reinforcing action to support integrated schools & neighborhoods.	<ul style="list-style-type: none"> • Lack of community revitalization strategies • Lack of private investments in specific neighborhoods • Lack of public investments in specific neighborhoods, including services or amenities • Location of proficient schools and school assignment policies 	Department of Planning and Office of Housing	In alignment with the Baltimore County Enterprise Strategic Plan 2019 to 2022, the County is exploring development of potential strategies and sustainable partnerships as solutions to this task including ensuring diversity, equitable access, and inclusive opportunities to achieve high academic outcomes for all learners; and pursuing expansion of "community schools" strategies throughout the County.
Task 6	Implement equity framework in public resource allocation decision making to bring neighborhoods into similar standards of service delivery and amenities.	<ul style="list-style-type: none"> • Lack of community revitalization strategies • Lack of private investments in specific neighborhoods • Lack of public investments in specific neighborhoods, including services or amenities • Location and type of affordable housing • Location of proficient schools and school assignment policies • Loss of Affordable Housing • Deteriorated and abandoned properties • Availability, type, frequency, and reliability of public transportation • Lack of access to opportunity due to high housing costs 	Diversity, Inclusion and Equity Community Advisory Council	In November of 2019 the newly elected County Executive established the Diversity, Inclusion and Equity Community Advisory Council which advocates for, engages in and responds to issues, concerns and needs of County residents as it relates to diversity, inclusion and equity. The Community Council's responsibilities include providing advisement to, and working collaboratively with, the Chief Diversity and Inclusion Officer on specific community diversity, inclusion and equity issues.

ROW #	BALTIMORE COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
Goal 6	Expand the availability of housing options for persons with disabilities	Potential for increased concentration of protected classes in low opportunity areas without expanded multifamily development envelope and Limited information for residents on fair housing rights and housing opportunities; need for expanded fair housing outreach and education		
Task 1	Devise means of more effectively publicizing the policy to increase the voucher payment standard for landlords who are willing to create accessible units.	<ul style="list-style-type: none"> • Access to publicly supported housing for persons with disabilities • Lack of affordable, accessible housing in range of unit sizes • Lack of assistance for housing accessibility modifications • Lack of assistance for transitioning from institutional settings to integrated housing • Location of accessible housing • Regulatory barriers to providing housing and supportive services for persons with disabilities. • State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing, shared housing, and other integrated settings. • Lack of local private fair housing outreach and enforcement 	Office of Housing	The Office of Housing will continue to incorporate voucher payment standards for landlords willing to create accessible units in its Annual, Five-Year and Administrative Plans.

ROW #	BALTIMORE COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
Task 2	Partner with regional affordable housing developers to increase the supply of accessible housing [in moderate and high opportunity areas], outside of racially/ethnically concentrated areas.	<ul style="list-style-type: none"> • Lack of community revitalization strategies • Lack of local or regional cooperation • Lack of affordable, accessible housing in range of unit sizes • Lack of affordable, integrated housing for individuals who need supportive services • Location and type of affordable housing • Location of accessible housing • Quality of affordable housing information programs 	Department of Planning	Since 2016 Baltimore County has worked with several affordable housing developers to assist with the creation of accessible housing units in areas of opportunity.
Task 3	Maintain a current list of landlords with accessible units to offer a high level of assistance to persons with disabilities.	<ul style="list-style-type: none"> • Access to publicly supported housing for persons with disabilities • Lack of affordable in-home or community-based supportive services • Lack of affordable, accessible housing in range of unit sizes • Lack of affordable, integrated housing for individuals who need supportive services • Lack of assistance for housing accessibility modifications • Lack of assistance for transitioning from institutional settings to integrated housing • Location of accessible housing • Regulatory barriers to providing housing and supportive services for persons with disabilities. • State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing, shared housing, and other integrated settings. • Lack of local private fair housing outreach and enforcement 	Office of Housing	Office of Housing continues to recruit landlords that have accessible housing.

ROW #	BALTIMORE COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
Goal 7	Improve the existing process for receiving, investigating and recording housing discrimination complaints	Limited information for residents on fair housing rights and housing opportunities; need for expanded fair housing outreach and education		
Task 1	Expand the protections of Article 29 to prohibit discrimination on the bases of familial status and sexual orientation in order to achieve consistency with Maryland's fair housing law.	<ul style="list-style-type: none"> • Lack of local private fair housing outreach and enforcement • Lack of local public fair housing enforcement • Lack of resources for fair housing agencies and organizations • Lack of state or local fair housing laws • Unresolved violations of fair housing or civil rights law 	Office of Housing/ Human Relations Committee/ County Executive	In 2012, the former County Executive signed legislation that added gender identity and sexual orientation to the county's existing anti-discrimination laws. Since the election of the new County Executive, the Source of Income legislation, known as the "Home Act", was successfully passed in November 2019. In alignment with the Baltimore County Enterprise Strategic Plan 2019 to 2022, the County plans to ensure greater economic viability and opportunity amongst traditionally underrepresented populations, communities, and businesses
Task 2	Continue to provide fair housing education and outreach efforts to landlords, building owners, rental agents and real estate agents.	<ul style="list-style-type: none"> • Lack of local private fair housing outreach and enforcement 	Department of Planning	Since 2017 Baltimore County has, and continues to fund vendors that provide fair housing services in the form of outreach and training geared towards housing industry professionals.

ROW #	BALTIMORE COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
Task 3	Support fair housing testing, Language Access Planning, diversity in housing and planning boards, investigating housing discrimination, and collaborative efforts with local and national advocates.	<ul style="list-style-type: none"> • Private discrimination • Source of income discrimination • Lending discrimination • State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing, shared housing, and other integrated settings. • Admissions and occupancy policies and procedures, including preferences in publicly supported housing • Lack of Access to publicly supported housing for persons with disabilities • Lack of Access to transportation for persons with disabilities • Lack of local public fair housing enforcement • Lack of resources for fair housing agencies and organizations • Lack of state or local fair housing laws • Lack of meaningful language access 	Department of Planning	The Department of Planning published the 2015 Language Access (LAP) Plan. Beginning in 2016 Baltimore County has, and continues to fund Fair Housing Action Center of Maryland to provide fair housing services in the form of outreach, training geared towards housing industry professionals, complaints and referrals and testing. In alignment with the Baltimore County Enterprise Strategic Plan 2019 to 2022, the County plans to build a future centered on equitable decisions, providing opportunities and allocating resources and services through an equity, diversity, and inclusion lens that enhances growth and prosperity.
Goal 8	Mitigate the extent to which mortgage loan denials and high-cost lending disproportionately affect minorities.	Potential for increased concentration of protected classes in low opportunity areas without expanded multifamily development envelope and Limited information for residents on fair housing rights and housing opportunities; need for expanded fair housing outreach and education		
Task 1	Continue to engage HUD-certified counselors to target credit repair education through advocacy organizations that work with minority populations.	<ul style="list-style-type: none"> • Quality of affordable housing information programs • Loss of Affordable Housing • Displacement of residents due to economic pressures 	Department of Planning	Credit repair education has been implemented in our ongoing contracts with HUD Certified Housing Counseling organizations contracted to provide housing counseling services.

ROW #	BALTIMORE COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
Task 2	Continue to facilitate home ownership education and outreach with particular attention to members of the protected classes.	<ul style="list-style-type: none"> Quality of affordable housing information provided 	Department of Planning	The County continues to facilitate education and outreach to home owners, home buyers and renters utilizing accessible venues and providing accessible materials for members of protected classes. These efforts continue to be reported in the County's CAPER.
Task 3	Determine whether a local agency exists that has the capacity to provide mortgage lending testing on the basis of race.	<ul style="list-style-type: none"> Lending discrimination Lack of resources for fair housing agencies and organizations 	Department of Planning	Since 2016 Baltimore County has, and continues to fund vendors that provide fair housing services in the form of outreach, training, intake of complaints and referrals, and testing on the basis of protected classes in the areas of rentals, sales and mortgage lending.

Harford County Fair Housing Action Plan

ROW #	HARFORD COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
Enhance regional fair housing capacity				
1	Support fair housing enforcement, testing and outreach in the County. Work with regional partners to provide sustained support and grow capacity of the Fair Housing Action Center of Maryland.	Capacity building to further jurisdiction commitment to affirmatively furthering fair housing choice; Lack of resources to support empowerment of residents faced with discrimination; Discrimination in housing choice	Harford County Office of Community and Economic Development	Utilize annual CDBG funding to contract with the Fair Housing Action Center of Maryland for fair housing testing, enforcement, outreach training and to provide annual fair housing training for landlords, property owners, property managers and tenants. Annual funding allocation: \$8,000.
Address barriers to equalizing access to opportunity				
2	Invest in older communities to support revitalization, commerce, jobs and homeownership as well as preserve affordable housing units.	Limited future development and more limited housing choice as the County approaches build out	Harford County Office of Community and Economic Development	Provide HOME and CDBG funds to support investment in older communities and to provide rehabilitation to older homes. Partner with eligible CHDOs to redevelop and preserve 20 affordable housing units throughout the County annually.
3	Continue to fund affordable housing for families, primarily in opportunity areas.	Concentration of affordable and accessible housing in low opportunity areas	Harford County Office of Community and Economic Development	Work with nonprofit and for-profit developers of affordable housing to create affordable housing units in opportunity areas. Increase the number of HCVs available for these units.
Increase ownership opportunities for under-represented households				
4	Continue to foster opportunities for homeownership throughout the County including housing counseling and down payment assistance for first time homebuyers.	Disparities in homeownership	Harford County Office of Community and Economic Development	Continue housing counseling and partnership with lending programs/partners to provide downpayment assistance to increase homeownership opportunities for first-time homebuyers.

ROW #	HARFORD COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
Increase rental housing options				
5	Explore increased FMRs and/or increased exception payment standards and provide mobility counseling to encourage voucher location in areas of opportunity.	Concentration of affordable and accessible housing in low opportunity areas	Harford County Office of Community and Economic Development	Continue the conversation with local partners and HUD to advocate for increased exception payment standards for rental units in Harford County.
6	Promote Family Self-Sufficiency (FSS) program and connect clients with transportation and employment opportunities.	Disparities in access to opportunities	Harford County Office of Community and Economic Development	Continue to market the FSS program to underserved communities.

Howard County Fair Housing Action Plan

ROW #	HOWARD COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
Increase rental housing options				
1	Explore existing County policies that may inhibit the creation of affordable housing, such as County Bill 18-2014	Limited future development and more limited housing choice as county approaches build out, especially if growth is reduced with APFO amendment	Howard County DHCD, Howard County Housing Commission	Work with Consultant and Housing Master Plan Task Force to complete the Housing Opportunities Master Plan by December 2020. The Plan will include community engagement work in each of the 5 council districts and complete an assessment of housing programs/policies in all departments/agencies of Howard County Government to improve efficiency, effectiveness and impact.
2	Open up new land use opportunities through zoning changes (e.g. commercial and industrial zones could allow affordable units) and/or donated land.	Limited future development and more limited housing choice as county approaches build out, especially if growth is reduced with APFO amendment AND Limited tools to produce affordable housing as new construction slows and growth becomes redevelopment- and infill-oriented	Howard County DHCD, Howard County Housing Commission, Howard County DPZ	Partner with the Department of Planning and Zoning to advocate for zoning changes that will open up land use for multi-family and affordable housing. Address geographic inequities in Housing Opportunities Master Plan.
3	Continue or increase funding for creating units and/or subsidizing tenant rents in opportunity areas. (e.g. dedicated funding source for affordable housing).	Disparities in Access to Opportunity; Increasing concentration of protected classes as county approaches build out and units become more scarce	Howard County Housing Commission, Howard County DHCD	Continue to work with BMC and BRHP to contribute funding for the Regional PBV program. Apply for federal voucher opportunities. Apply for state and federal funds to leverage with County funds.
4	Explore increased FMRs and/or Increased exception payment standards and provide mobility counseling to encourage voucher location in Opportunity Areas.	Disparities in Access to Opportunity; Increasing concentration of protected classes as county approaches build out and units become more scarce	Howard County Housing Commission	Continue to work with HUD to request exception payment standards for rental units in Howard County.

ROW #	HOWARD COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
5	<p>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:</p> <p>a. Ensure the Baltimore metropolitan area receives at least 50 percent of Maryland tax credits awarded, reflecting the Baltimore area's proportion of the State's low income population.</p> <p>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.</p>	Disparities in Access to Opportunity; location and type of affordable housing; siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plan and other programs	Howard County Housing Commission	Continue to work with BMC to provide comments to the State regarding the annual LIHTC application.
Expand fair housing resources and compliance				
6	<p>Support fair housing enforcement, testing and outreach in the County. Work with regional partners to provide sustained support and grow capacity of the Fair Housing Action Center of Maryland.</p>	Overt discrimination may continue to be a problem. Testing is necessary to ensure compliance with Fair Housing requirements.	Howard County DHCD, Howard County Housing Commission, Howard County Office of Human Rights	Provide annual funding for fair housing testing, enforcement and outreach training. Provide annual fair housing training for landlords, property owners, property managers and tenants. Annual funding estimate \$6000 - \$8000.
Address barriers to equalizing access to opportunity				
7	<p>Invest in older communities to support revitalization, commerce, jobs and homeownership as well as preserve affordable housing units, especially in areas along transportation routes.</p>	Limited future development and more limited housing choice as county approaches build out, especially if growth is reduced with APFO amendment	Howard County DHCD, Howard County Housing Commission	Utilize Community Renewal funds to support investment in older communities and to provide funding for rehabilitation loan programs. Work with the Housing Commission and area non-profits to redevelop and preserve 25-30 affordable housing units, especially in areas with transit access.

ROW #	HOWARD COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
8	Support efforts to nurture and sustain racially integrated communities in Howard County, such as the new Columbia Housing Center.	Increasing concentration of protected classes as county approaches build out and units become more scarce	Howard County DHCD, Howard County Housing Commission, Howard County Office of Human Rights and Office of Consumer Protection	Provide annual CDBG funding for this effort to ensure there is inclusiveness, equity, openness and accountability. Address geographic inequities in Housing Opportunities Master Plan.
Increase ownership opportunities for under-represented households				
9	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.	Disparities in homeownership rates; access to financial services	Howard County DHCD	Continue conversations with lenders begun through development of 2019 Regional AI and engage Housing Opportunities Master Plan Task Force. Include action plan in the Housing Opportunities Master Plan.
Expand fair housing choice for persons with disabilities				
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.	Access to publicly supported housing for people with disabilities; need for affordable, integrated housing for individuals who need supportive services.	Howard County DHCD, Howard County Housing Commission	Educate developers and builders about the DIHU (Disability Income Housing Unit) method of optional compliance for the MIHU requirement in a development. Include action plan in the Housing Opportunities Master Plan.