

FAIR HOUSING GROUP AI IMPLEMENTATION PLAN – FY 2025

10/8/2024

FY 2024 Highlights

- Baltimore Regional Fair Housing Group members signed an MOU to fund and develop an updated Regional Analysis of Impediments to Fair Housing Choice (AI) and issued a request for proposals for a consultant through the Baltimore Metropolitan Council (BMC). BMC and the Fair Housing Group also:
 - Contracted with Root Policy Research in early 2024.
 - Established partnerships with the Baltimore Neighborhood Indicators Alliance for analysis using BMC’s database of affordable housing and Baltimore Regional Housing Partnership for opportunity mapping.
 - Created stakeholder working groups for three key topics:
 - Fair Housing Enforcement in the Private Real Estate Market
 - Fair Housing Barriers for Renters
 - Housing Supply and Siting of Affordable Housing
 - Held a virtual kickoff in May 2024 attended by 68 people.
- In preparation for the updated AI, the Fair Housing Group and BMC held a training by attorney Sara Pratt on the duty to affirmatively further fair housing in September 2023 attended by 19 officials from all six Fair Housing Group jurisdictions, including representation from two planning departments and three law departments.
- BMC and Fair Housing Group members continued to integrate local governments’ fair housing and transportation planning by helping to shape a study of regional opinions related to housing and transportation. That study, funded by the Baltimore Regional Transportation Board, involved 96 participants from all Fair Housing Group jurisdictions. Those participants responded to four weeks of online prompts and 27 participated in three follow-up focus groups. The study focused on perceptions of housing costs and the housing market, public transit and transportation, housing supply constraints, possible solutions, and how housing can best relate to transportation infrastructure. Findings are expected in fall 2024.
- The Regional Project-Based Voucher (PBV) Program committed additional vouchers and leased up additional units in FY 2024:
 - The rolling March 2023 request for proposals (RFP) yielded six proposals before closing in fall 2023. The Program made two awards to new developments totaling 28 vouchers. The Program also made its first intent to award vouchers to existing housing – 33 units at Orchard Meadows Apartments in Ellicott City. The Howard County Housing Commission, which was recused from this RFP process, purchased that property during this fiscal year through Howard County’s Right of First Refusal law. The Regional PBV Program’s intent to award these 33 PBVs was critical to financing the purchase.
 - The Regional PBV Program also leased up the 10 PBV apartments at the Village at Blenheim Run in Havre de Grace, bringing the total PBV units leased to 44.
- Regarding affirmative marketing, as suggested by the Maryland Department of Housing and Community Development (DHCD), the Fair Housing Group public housing authorities (PHAs) developed a tailored template for the referral MOU now required by DHCD of Low Income Housing Tax Credit (LIHTC) awardees. In April 2024, the affordable housing developer Ingerman signed that MOU

with the Baltimore Regional Housing Partnership (BRHP) for Willows at Forest Drive in Annapolis. Through this MOU, Ingerman agrees to:

- Provide notice of first lease-up to BRHP and establish accurate listings on www.MdHousingSearch.org at least 30 days before first lease-up.
- When screening BRHP voucher holders, not apply a minimum credit standard, not consider student loan or medical debt, and accept BRHP's criminal background screening.
- Before shifting to focus on the new fair housing analysis, the BMC Housing Committee continued to be a forum for discussing AI implementation and other key fair housing and housing-related issues, including:
 - Presentation of the 2023 Housing Association of Nonprofit Developers (HAND) Housing Indicator Tool (HIT),
 - Discussion of drafts and then the final 2023 Maryland Qualified Allocation Plan (QAP),
 - Review of the draft FY24 AI Implementation Plan,
 - Requests for proposals regarding the housing & transportation opinion research cited above and the Baltimore Regional Project-Based Voucher Program,
 - Initial plans to engage stakeholders around the update of our 2020 Regional AI,
 - Results from the Johns Hopkins 21st Century Cities 2023 Baltimore Area Survey, and
 - The new Maryland DHCD UPLIFT Program to address racial appraisal gaps and promote homeownership for people of color.
- Fair Housing Group jurisdictions continued to promote the enforcement of fair housing protections through trainings and testing.
 - Funded primarily by Baltimore County, Economic Action Maryland conducted twelve trainings that reached more than 100 people, including members of the general public, first-time homebuyers, homeownership and rental housing counselors, and housing providers.
 - Anne Arundel and Harford Counties funded the Equal Rights Center in carrying out a total of 33 paired tests in those two jurisdictions.
- Baltimore-area public housing authorities heard suggestions from and held a discussion with two attorneys with Community Legal Services in January 2024. All PHAs believe they have made any necessary changes to comply with the fair housing rights of people with disabilities participating in their programs.
- BMC has continued to produce a report of regional accomplishments for inclusion in jurisdiction Consolidated Annual Performance and Evaluation Reports (CAPERs).

Contact with questions:

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Legend

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

✓ = Completed action/outcome

Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
<i>Enhance regional fair housing capacity</i>					
1. Continue to support housing policy coordination staffing at BMC to coordinate the implementation of the Action Plan in the 2020 Regional AI and reporting of regional progress through local government Consolidated Annual Performance and Evaluation Reports (CAPERs).					
Every jurisdiction has signed three-year MOU committing to continued collaboration and to increase their contributions to BMC regional coordination to a total of \$60,000/year beginning July 1, 2020. All jurisdictions have signed updated MOU for FY24-26, including 2% annual increase.	✓	✓	✓	✓	
In addition to ongoing coordination, BMC produces progress report each summer that local governments incorporate into their CAPERs.	✓	✓	✓	✓	•
Fair Housing Group reviewed draft HUD rule on affirmatively furthering fair housing and is now fully engaged in updating 2020 Regional AI. Jurisdictions and public housing authorities (PHAs) finalized MOU in January 2024, issued RFP, hired Root Policy Research, the Baltimore Neighborhood Indicators Alliance (BNIA) at the University of Baltimore, and the Baltimore Regional Housing Partnership (to create new opportunity map) to assist. Update formally kicked off in May with virtual meeting attended by 68 people. Final analysis anticipated in January 2025			✓	✓	•
Expected outcome: Strong progress on 2020 AI regional action items and new 2025 Regional fair housing analysis with updated action plans for FY 2026-2030					•
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.					
Supported by Baltimore-area local governments, in FY 21, the Fair Housing Action Center (FHAC) conducted 22 matched pair tests for source-of-income discrimination and 11 matched pair and triple tests on lending discrimination. In FY22, FHAC refined its testing process, recruited additional testers, and conducted 10 matched pair tests for source of income discrimination. Also reached seven property managers with online training.	✓	✓			

Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Fair Housing Action Center, now rebranded as the fair housing program of Economic Action Maryland (EAM), and jurisdictions set goals of 50 paired tests in FY 2023, 75 in FY 2024, and 100 in FY 2025; and two trainings for property managers each fiscal year, reaching at least 50 property managers with each training. EAM conducted 36 paired tests in FY23, short of the goal, although Anne Arundel County contracted with the Equal Rights Center to conduct 50 additional tests. Five EAM trainings in FY23 included 47 Baltimore-area property manager participants among the 95 total participants, also short of our goal.		✓	✓		
In FY24, Economic Action Maryland conducted twelve trainings, primarily in Baltimore County: seven trainings serving a total of 87 residents, one training for housing counselors and homebuyers, another for rental housing counselors, and three training for 26 property owners/managers. The Equal Rights Center conducted 33 paired tests in Anne Arundel and Harford Counties in FY24.				✓	•
Began to hold enforcement coordination meetings with Maryland Commission on Civil Rights, local civil rights agencies, and Economic Action Maryland. Working group created as part of developing new 2025 regional fair housing analysis in order to determine most effective methods of communication and coordination to maximize enforcement action.			✓	✓	
Expected outcome: Effective action steps in 2025 fair housing analysis to result in robust and regular training of property owners and managers, systematic paired testing around the region, and effective coordination of tracking and enforcement to root out discrimination.					•
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 2020 Regional AI action steps and strategize on further action.					
Notable FY21 Housing Committee discussions included sharing information on COVID-19-related rent relief, the Central Maryland Regional Transit Plan, BMC's Baltimore Region Transit Funding and Governance Study, relevant legislation in the 2021 General Assembly, LIHTC award analysis, housing and zoning reforms in Anne Arundel and Howard Counties, AI implementation, tackling racial homeownership gaps, and the 2020 Maryland Housing Needs Assessment.	✓				
Notable FY22 Housing Committee work included reconvening the BMC's Housing Affordability Preservation Task Force, including exploring notification requirements and Year 15 preservation issues related to Low Income Housing Tax Credits; devoting two meetings to developing and carrying out priority strategies for tackling racial gaps in homeownership; discussing the 2020 Maryland Housing Needs Assessment; learning how Montgomery County eliminated its development moratorium around school capacity; hearing about the Baltimore City's Planning Department's Equity in Planning work; and working with the Maryland Dept. of Housing and Community Development (DHCD) around affirmative marketing of State-supported rental housing.		✓			

Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Notable FY23 Housing Committee meetings included updating this implementation plan as well as priority strategies for reducing homeownership gaps, hearing from banks on special purpose credit programs to address Black and Latino homeownership, hearing from real estate experts about the housing shortage in the Baltimore region, hearing from Prince George’s County regarding their preservation-oriented right of first refusal in sales of multifamily properties, regular convening of Preservation Task Force (including learning about similar efforts currently in place in Detroit and Washington, DC), learning about new Maryland DHCD report on racial disparities in Maryland real estate, and learning about how Anne Arundel and Howard Counties have addressed housing in their comprehensive planning processes.			✓		
Notable FY24 Housing Committee meetings included a presentation of the latest Housing Association of Nonprofit Developers (HAND) Housing Indicator Tool (HIT), discussion of drafts and then the final 2023 Qualified Allocation Plan (QAP), the draft FY24 AI Implementation Plan, requests for proposals re: housing & transportation opinion research and our Regional Project-Based Voucher Program, initial plans to engage stakeholders around the update of our 2020 Regional AI, results from the Johns Hopkins 21 st Century Cities 2023 Baltimore Area Survey, and the new Maryland DHCD UPLIFT Program to address racial appraisal gaps and promote homeownership for people of color.				✓	
Expected outcome: BMC and Fair Housing Group Chair to convene BMC Housing Committee quarterly or as needed on an ongoing basis	✓	✓	✓	✓	•
<i>Increase rental housing options</i>					
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.					
PHAs and BRHP contribute a total of \$60,000/year toward BMC coordination of Regional PBV Program beginning July 1, 2020; MOU updated in FY 2023, including 2% increase per year.	✓	✓	✓		
PHAs contributed an additional 43 vouchers to the Regional PBV Program “virtual pool” in summer 2020, bringing the total to 193. We issued a July 2020 request for proposals and awarding an additional 21 vouchers to three opportunity area developments. Unfortunately, none of the three developments were able to move forward due to a lack of Low Income Housing Tax Credits or zoning. Fortunately, other developments were moving forward, and our program was able to help 10 families lease units in one of two developments by June 30, 2021.	✓				
Program issued two RFPs in FY 2022, receiving six proposals for 139 vouchers. Only one proposal surpassed the threshold to receive an award, however, for 20 vouchers. As of June 30, 2022, 121 vouchers have been awarded, and 34 units were occupied in the first four developments to be completed.		✓			

Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
28 vouchers rescinded from two developments that became non-viable, leaving 93 vouchers in use or moving forward and 100 available for future awards. New rolling RFP issued in March 2023 until late August.			✓		
<p>Program Selection Panel extended the 2023 RFP into September, resulting in six total proposals. Those yielded two awards for new developments totaling 28 vouchers and our first intent to award vouchers to existing housing. PBV awards to existing housing don't formally occur until the units are available and inspected for occupancy, so the Program awarded five vouchers in February 2024, although the Program intends to award 33 to Orchard Meadows Apartments in Ellicott City.</p> <p>At the same time, the Howard County Housing Commission (recused from the Selection Panel for all these decisions) asked to reduce the Program's award to Artist Flats at Cultural Center in Columbia from 20 to 16. The Program granted that revised award.</p> <p>All of this brings the Program's formal awards to 126 vouchers, with an intent to award a total of 150 vouchers, leaving only 43 for any future RFP. The Program determined in 2023 that the Baltimore Regional Housing Partnership had exhausted the funding for mobility counseling in the original 2015 HUD seed grant. The Program is now working to find a viable new source of funding for mobility counseling before issuing another 2024 RFP.</p> <p>In FY2024 the Program leased up the 10 units at the Village at Blenheim Run in Havre de Grace, resulting in a total of 44 PBV units leased by June 30, 2024.</p>				✓	
<p>Expected outcome: 140 vouchers awarded and 70 units occupied by June 30, 2025. Goals revised from 200 and 120 based on recent overall development financing difficulty and also being behind on 9% Low Income Housing Tax Credit awards in Communities of Opportunity (#5 below). All vouchers so far have been used in conjunction with LIHTC.</p>					•
<p>5. Continue to monitor the Maryland Department of Housing and Community Development's (DHCD's) awards of Low Income Housing Tax Credits (LIHTC) and advocate for Qualified Allocation Plan (QAP) policies that:</p> <ul style="list-style-type: none"> a. Ensure the Baltimore metropolitan area receives at least 50% of Maryland tax credits awarded, reflecting the Baltimore area's proportion of the State's low income population. 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. 					

Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025																																				
<p>BMC compiles analysis of DHCD LIHTC awards each year and coordinates Fair Housing Group regional comments to DHCD when DHCD asks for input. Chairs of Fair Housing Group and PHA group help lead effort to compile regional comments. No QAP changes in FY 2021 and no competitive LIHTC round in FY 2022. Comments submitted October 2021, and helpful income-targeting change for Regional PBV Program made in 2022 QAP, but not recommended increase in incentives for metro-area family opportunity developments. Comments submitted March 2023. Some Year 15 preservation recommendations adopted, but not Choice Neighborhoods or opportunity area recommendations.</p>	✓	✓	✓	✓	•																																				
<p>Awards from Maryland DHCD’s 2020 9% LIHTC round reached our revitalization goals, but not our opportunity area goals. Baltimore City received four awards, including two for the Perkins-Somerset Choice Neighborhoods redevelopment. But the Baltimore area received only seven out of 18 total statewide awards for 444 units, short of our 50% goal of 556. And only three of those seven awards were in opportunity areas, all in Anne Arundel County. The 161 units in those three awards was short of our 32.5% goal of 361.</p>	✓																																								
<p>Awards from Maryland DHCD’s 2022 9% LIHTC round also reached our revitalization goals, but not our opportunity area goals. Baltimore City received three awards, including for its Perkins Homes redevelopment submission. In this round the Baltimore area did receive half of statewide awards. But the total 313 opportunity-area units awarded 2020-22 was only 18% of total 1,717 units statewide.</p>			✓																																						
<p style="text-align: center;">Maryland 9% LIHTC Award Trends 2011-2023</p> <table border="1"> <caption>Maryland 9% LIHTC Award Trends 2011-2023</caption> <thead> <tr> <th>Year</th> <th>Goal for Balt-Area Family Oppty Awards (%)</th> <th>Actual Balt-Area Family Oppty Awards (%)</th> </tr> </thead> <tbody> <tr><td>2011 Awards</td><td>32.5</td><td>7</td></tr> <tr><td>2012 Awards</td><td>32.5</td><td>4</td></tr> <tr><td>2013 Awards</td><td>32.5</td><td>0</td></tr> <tr><td>2014 Awards</td><td>32.5</td><td>10</td></tr> <tr><td>2015 Round</td><td>32.5</td><td>10</td></tr> <tr><td>2016 Round</td><td>32.5</td><td>25</td></tr> <tr><td>2018 Round</td><td>32.5</td><td>75</td></tr> <tr><td>2019 Round</td><td>32.5</td><td>20</td></tr> <tr><td>2020 Round</td><td>32.5</td><td>15</td></tr> <tr><td>2022 Round</td><td>32.5</td><td>22</td></tr> <tr><td>2023 Round</td><td>32.5</td><td>45</td></tr> </tbody> </table>	Year	Goal for Balt-Area Family Oppty Awards (%)	Actual Balt-Area Family Oppty Awards (%)	2011 Awards	32.5	7	2012 Awards	32.5	4	2013 Awards	32.5	0	2014 Awards	32.5	10	2015 Round	32.5	10	2016 Round	32.5	25	2018 Round	32.5	75	2019 Round	32.5	20	2020 Round	32.5	15	2022 Round	32.5	22	2023 Round	32.5	45				✓	
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<p>For the first time since 2018, the April 2024 awards from Maryland’s 2023 9% LIHTC round met our opportunity area goals. The Baltimore region received 56% of statewide awards, with 85% of those Baltimore-area awards – 337 units – going in Communities of Opportunity (COOs). Combined, this meant that, for this round, 47% of statewide awards were in Baltimore-area Communities of Opportunity, well above our goal of 32.5%. (See graph above.) This was not the result of policy changes, however, since scoring incentives remained the same from past years that resulted in relatively few COO awards.</p> <p>The 2023 round also brought us closer to our overall prorated goals for total 9% LIHTC coming to the Baltimore region and share of those going to Communities of Opportunity (COOs). Since 2020, Maryland DHCD has awarded 9% LIHTC to 650 units in COOs, or 86% of our pro-rated goal of 771.</p> <div data-bbox="180 638 1108 1177"> <table border="1"> <caption>2020 Regional AI 9% LIHTC Prorated Goals-to-Actual</caption> <thead> <tr> <th>Category</th> <th>2020-2023 Actual</th> <th>Prorated 2025 Goal</th> </tr> </thead> <tbody> <tr> <td>Units Awarded</td> <td>1,157</td> <td>1,180</td> </tr> <tr> <td>Family COO Units</td> <td>650</td> <td>771</td> </tr> <tr> <td>Revitalization Units</td> <td>507</td> <td>420</td> </tr> </tbody> </table> </div>	Category	2020-2023 Actual	Prorated 2025 Goal	Units Awarded	1,157	1,180	Family COO Units	650	771	Revitalization Units	507	420					
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Units Awarded	1,157	1,180															
Family COO Units	650	771															
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<p>Expected outcomes: 9% LIHTC awards FY 2021-2025 include 2300 units awarded in Baltimore region (1,157 so far, or 50%), including 1500 family units in areas of opportunity (650 so far, or 43%) and 800 units contributing to concerted community revitalization plans (507 so far, or 63%). Maryland DHCD has awarded far fewer 9% LIHTC than anticipated, however, and so prorating our goals relative to statewide 9% LIHTC awards, as in the chart above, brings us closer.</p>					•												
<p>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.</p>																	

Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Application submitted Feb. 1, 2021 requesting 112 additional vouchers and \$4.5 million for mobility-related services and set-up expenses. Proposed six-year regional program involves five PHAs, BMC, and the Baltimore Regional Housing Partnership, and it enrolls a total of 2,168 families with children.	✓				
Outcome: We did not receive an award.					
7. Continue to distribute portability educational booklets and show video in all PHA voucher briefings. Conduct an electronic survey of voucher holders who have ported within the metropolitan area in the last two or more years and, where possible, attempted to port in order to identify how much difficulty they may have experienced. Use the findings to develop plans for intra-regional ports moving forward.					
Distribution of portability education booklet and showing of video at voucher briefings ongoing.		✓	✓	✓	•
Administered electronic survey with responses from 18 voucher holders who had recently ported or attempted to port. Results demonstrated overall satisfaction with the porting process		✓			
Expected outcome: Porting survey results analyzed and no additional action needed at this time.		✓			
8. Through Regional Preservation Task Force, assist local governments in designing affordable housing contracts to facilitate preservation at their expiration.					
Through March 2022 Housing Committee meeting, began a discussion of how extractive investors can exploit weaknesses in contracts to harm affordability at Year 15 point. Spurred Maryland DHCD-led effort to explore possible improvements to Qualified Allocation Plan (QAP).		✓			
Discussion resulted in March and July 2023 recommendations to Maryland DHCD for 2023 QAP. Those in turn yielded a new requirement in the final September 2023 QAP that the partnership agreement for Low Income Housing Tax Credit (LIHTC) developments must prevent the investor partner from seeking early termination of extended affordability requirements, from inappropriately removing the general partner or management member and from drawing from project reserves upon exit. We realized that regulation of this needs to be on the State level and that local affordability requirements need to be coordinated with the State.			✓	✓	
In FY24, Preservation Task Force also discussed the latest Housing Association of Nonprofit Developers (HAND) Housing Indicator Tool (HIT) and the AIRS/Empire Homes portfolio in Baltimore City, where affordable properties for people with disabilities are being lost to HUD foreclosure.				✓	
Outcome: State action to prevent early termination of LIHTC affordability restrictions.				✓	
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.					

Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Housing Commission of Anne Arundel County invited input from Legal Aid and made changes to policies as a result. Housing Authority of the City of Annapolis and Housing Authority of Baltimore City have reviewed and adjusted policies as part of fair housing litigation.			✓		
Remaining PHAs heard suggestions from representatives of Community Legal Services in January 2024 and believed they had already made any appropriate changes to policies.				✓	
Expected outcome: All PHAs implement any needed changes.				✓	
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.					
Housing Commission of Anne Arundel County invited input from Legal Aid and made changes to policies as a result. Housing Authority of the City of Annapolis and Housing Authority of Baltimore City have reviewed and adjusted policies as part of fair housing litigation.			✓		
Remaining PHAs heard suggestions from representatives of Community Legal Services in January 2024 and believed they had already made any appropriate changes to policies.				✓	
Expected outcome: All PHAs implement any needed changes.				✓	
<i>Increase ownership opportunities for underrepresented households</i>					
11. Engage lenders in discussions about homeownership and mortgage lending disparities and how to address. Seek investments in financial literacy programs (including in schools) and assistance in helping subprime loan holders refinance to conventional loans. Develop specific action steps to address disparities in the minority homeownership rate.					
Continue conversations with lenders begun through development of 2020 Regional AI. Compiled a list of lenders who work with housing choice voucher (HCV) homeownership programs and discussed with PHAs how to boost existing programs and start new ones.	✓	✓			
Engaged Housing Committee at June 2021 meeting. Developed set of priority strategies. Devoted March and June 2022 Housing Committee meetings to implementation of those strategies.	✓	✓			

Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
<ul style="list-style-type: none"> Held six focus groups with housing counseling agencies that included a total of 29 housing counselors. Top barriers included resources to put toward a down payment and ongoing mortgage payments as well as lack of available homes at a reasonable price. Conducted an electronic survey of people who have received housing counseling in an effort to buy a home. Compiled a chart with all State and local down payment assistance programs in the Baltimore region. Learned about a new race-conscious mortgage product being developed by Neighborhood Housing Services-Baltimore in order to narrow Baltimore’s racial homeownership gap. 		✓			
<ul style="list-style-type: none"> Compiled chart of special purpose credit programs available in Baltimore and heard from Chase and TD Bank. Given housing counselor feedback on high prices as key hurdle, explored evidence of a regional housing shortage and worked with Baltimore Regional Transportation Board to create a FY24 Unified Planning Work Program item to explore public attitudes around housing growth. The Cities of Baltimore and Annapolis established new down payment assistance programs and Anne Arundel, Harford, and Howard Counties increased assistance in their existing programs. Updated priority strategies given work and information gathered to date. 			✓		
Carried out focus groups exploring public attitudes toward housing growth, affordable housing, and transportation, including transit-oriented development.				✓	
Create new BMC web page, including homeownership success stories, special purpose credit programs, local and State down payment assistance programs, home repair assistance programs (for homeownership preservation)					•
Evaluate utility and workability of credit alternatives, such as Underwriting for Good and Tu Hogar.					•
Explore ways to elevate mortgage lenders with good track records serving Black homebuyers.					•
Evaluate success of higher local government down payment assistance programs.					•
Explore success of homebuyer clubs and other peer-support, socially oriented homeownership strategies.					•
Expected outcome: Based on goals set in action plan.					•
<i>Address barriers to equalizing access to opportunity</i>					
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					

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Expected outcome: Local governments, coordinated by BMC, submit letter to governor at appropriate time supporting renewal of Project CORE funding for Baltimore City and other appropriate transformative investments in R/ECAPs.					•
13. Support improved public transit access, including for persons with disabilities, to suburban job centers and opportunity areas with multifamily housing.					
BMC Housing Committee briefed on BMC's Regional Transit Funding and Governance Study at its March 2021 meeting.	✓				
Expected outcome: Engagement by housing agencies and stakeholders in regional transit planning process.					•
14. Work with relevant agencies, such as the Maryland Transit Administration (MTA), to explore State or regional/federal support for alternatives to public transportation, such as Vehicles for Change, Lyft, Uber, etc., ensuring accessibility for persons with disabilities.					
BMC connect Fair Housing Group and Housing Committee to efforts within MTA and/or Baltimore Regional Transportation Board to explore these efforts, as well as any other efforts, such as South Baltimore Gateway Partnership.					•
Expected outcome: Any appropriate support by local governments for these 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.					
BMC facilitated conversations between jurisdictions and Maryland DHCD.	✓				
BMC to submit Public Information Act (PIA) request to Maryland DHCD regularly starting summer/fall 2021, followed by analysis of data from fair housing perspective.		✓		✓	•
2021 PIA request showed 90 percent of housing choice voucher (HCV) use missing. Effort to improve reporting initiated with Maryland DHCD.		✓			
Analysis of 2021 PIA data also showed that Black residents were substantially able to access new opportunity-area LIHTC homes created through Maryland DHCD's 2017 voluntary conciliation agreement. Still, many individual properties show a need for additional affirmative marketing.			✓		
Expected outcome: Data more readily available.					•
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.					
BMC staff connected Baltimore County to Dr. Tiffany Manuel (DrT) in FY 2021 regarding her innovative research in this area. Baltimore County began working with DrT more formally in FY 2022.	✓	✓			

Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
As stated in #11 above, carried out focus groups exploring public attitudes toward housing growth, affordable housing, and transportation, including transit-oriented development.				✓	
Expected outcome: Results of FY24 focus groups put to use by policy makers in region					•
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.					
2025 AI effort includes analysis of impact of crowded schools on residential development.				✓	
Expected outcome: 3-5 meetings as part of 2024 Regional AI effort.					•
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.		✓			
Expected outcome: Baltimore City presented on their Equity in Planning work at December 2, 2021 Housing Committee meeting. 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.					
Maryland Citizens Health Initiative presented to August 5, 2021 Housing Committee regarding the 2021 legislation establishing Health Equity Resource Communities.		✓			
Attended Baltimore convening by the National Fair Housing Alliance to explore coordinating fair housing analyses and hospitals' Community Health Needs Assessments. Also organized a meeting with representatives of Lifebridge, St. Agnes, and Bon Secours to further explore that possibility locally.				✓	
Further meetings as useful.					•
Expected outcome: Act on any useful synergies between health care institutions and housing, as resources allow.					•
<i>Expand fair housing resources and compliance</i>					
20. Continue to engage with Maryland DHCD to make www.MdHousingSearch.org an effective: <ul style="list-style-type: none"> a. Clearinghouse of publicly assisted and market-rate rental homes, including homes accessible to persons with disabilities, b. Affirmative fair housing marketing tool for homes assisted through Maryland DHCD and other agencies, and c. Viable tool for public housing authorities to refer their housing choice voucher holders, including those with disabilities. 					

Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Reiterated request to Maryland DHCD that Md. Housing Search automatically populate accessibility features based on Fair Housing Act requirements. Response still pending.	✓	✓			
Expected outcome: Automatic population implemented.					•
Fair Housing Group re-engaged with Maryland DHCD regarding Maryland Housing Search and agreed on regular communication and prioritization of improvement for the platform.	✓				
New ability to save Md. Housing Search apartment searches and get notices when homes become available rolled out fall 2021.		✓			
Conducted several calls with Maryland DHCD regarding effective implementation of affirmative marketing, including a training for property managers and owners.	✓	✓	✓		•
<p>Began to monitor DHCD's requirement of an MOU between DHCD-supported owners and local PHAs and mobility programs. First discussions about improving MOUs with representatives of Maryland Affordable Housing Coalition. PHA point person list compiled for DHCD to share with property owners and managers.</p> <p>First MOU using regional PHA group template signed in April 2024 by Ingerman and Baltimore Regional Housing Partnership (BRHP) for Willows at Forest Drive in Annapolis. Through this MOU, Ingerman agrees to:</p> <ul style="list-style-type: none"> • Provide notice of first lease-up to BRHP and establish accurate listings on www.MdHousingSearch.org at least 30 days before first lease-up. • When screening BRHP voucher holders, not apply a minimum credit standard, not consider student loan or medical debt, and accept BRHP's criminal background screening. 		✓	✓	✓	•
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.		✓	✓	✓	•
Expected outcome: Md. Housing Search is a reliable, up-to-date database of available apartment homes used by DHCD-assisted property owners for affirmative marketing and by low-income families and PHAs and voucher holders to find affordable places to live.					•
21. All PHAs offer online rental resources beyond GoSection8.com, including market-rate resources such as Apartments.com and Zillow and, as it becomes more effective, Md. Housing Search.					
As of FY23, five of six PHAs include additional online rental resources beyond GoSection8.com and refer voucher holders to Md. Housing Search.	✓	✓	✓	✓	
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.					•
Expected outcome: All PHAs use a variety of apartment referral tools, including Md. Housing Search					•

Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
22. Review literature on criminal background and subsequent criminal activity – connected to assisted housing, if possible – to see what that research indicates the most justified criminal background standard for assisted housing should be.					
Internet search for studies conducted, revealing only one January 2019 study by Wilder Institute of 10,000 units of affordable housing in Minnesota and Wisconsin – “Success in Housing: How Much Does Criminal Background Matter?” It found no effect for many minor offenses, and that effects reduced to insignificance over 2-5 years for more major offenses	✓				
Reviewed 2022 HUD Policy Development & Research post on criminal background checks, additional studies cited, and coverage of new policies in Seattle, Minneapolis, and New Jersey. In April, HUD announced imminent proposed new changes to its regulations on criminal background consideration.			✓		
Reviewed HUD’s proposed new regulations. All PHAs are already conducting individual assessments and most do not look back further than three years.				✓	
Communicate results to Maryland DHCD, affordable housing developers through Maryland Affordable Housing Coalition, and market-rate property owners and managers through fair housing trainings and other methods					•
Expected outcome: Criminal background standard supported by research in place for PHAs and other assisted housing.					•
23. Conduct a training for local government and public housing authority officials on the duty to affirmatively further fair housing following each State election cycle.					
Training scheduled for September 2023.			✓		
Outcome: BMC and Fair Housing Group held September 2023 training by attorney Sara Pratt attended by 19 officials from all six Fair Housing Group jurisdictions, including representation from two planning departments and three law departments.				✓	
24. BMC and Regional Fair Housing Group sponsor fair housing trainings for property managers at least twice per year.					
Fair Housing Action Center held one training specifically for property managers, serving seven.		✓			
Economic Action Maryland (new home of work of former Fair Housing Action Center) held two HOME Act trainings in April 2023, serving 13 Baltimore-area property managers. Three other trainings, including disability and general fair housing compliance, attracted another 34 attendees.			✓		
Economic Action conducted three trainings for 26 property owners/managers in FY24.				✓	
Expected outcome: Address training needs going forward through 2025 fair housing analysis.					•

Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
25. Work with Maryland DHCD, fair housing organizations, and HUD Fair Housing and Equal Opportunity (FHEO) to convene affirmative marketing training for the affordable housing industry as well as state and local agencies involved in the financing and/or developing of affordable housing.					
BMC staff worked with DHCD and Maryland Affordable Housing Coalition to conduct an electronic survey of more than 100 property managers to gauge needs for affirmative fair housing marketing training.		✓			
Expected outcome: Address need for affirmative marketing going forward through 2025 fair housing analysis.					•
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.					
BMC and Fair Housing Group to update information in 2014 Fair Housing education booklets as part of 2025 Regional AI effort, including HOME Act information, and explore with fair housing stakeholders whether an online or phone app interface might be more effective than printed booklets to disseminate information. Explore coordinating with local rental registration processes for education of property owners.					•
Expected outcome: Solution included in 2025 Regional AI.					•