

FAIR HOUSING GROUP FY 2013-2020 AI IMPLEMENTATION PLAN

8/24/20

FY 2020 Highlights

- Completed a new 2020 Regional Analysis of Impediments to Fair Housing Choice (AI), including:
 - Continued work with consultant team led by Root Policy Research to release a draft AI on March 2 and finalize it by the end of June.
 - Use of BMC's Preservation Database for analysis of publicly assisted units, including by accessibility for persons with disabilities and location relative to opportunity areas.
 - Convening the AI Stakeholder Work Group an additional three times – twice to review draft action steps and one additional time jointly with the BMC Housing Committee to review the draft AI – making a total of eleven Stakeholder Work Group meetings.
 - Seven additional outreach meetings and events, combined with 28 from fiscal year 2019 to make a total of 35 outreach meetings and events.
 - One additional local hearing, combined with six from FY 2019 for a total of seven local hearings prior to the release of the draft Regional AI on March 2, 2020.
 - 52-day public comment period on draft AI from March 2 to April 22, 2020, including public hearing.
 - Edits to draft and responses to comments completed by end of June.
 - Action steps included in each jurisdiction's Consolidated Plan set to begin July 1, 2020.
- Moved to expand and sustain the Baltimore Regional Project-Based Voucher (PBV) Program, a collaboration of six public housing agencies (PHAs), the Baltimore Regional Housing Partnership (BRHP), and Baltimore Metropolitan Council (BMC):
 - Participating housing agencies signed an addendum to the original 2016 Intergovernmental Agreement:
 - Adding an additional 50 vouchers to the program, bringing it to a total of 150 vouchers.
 - Promising to contribute a total of \$60,000 per year beginning fiscal year 2021 to support central coordination of the program by BMC's housing policy coordinator, sustaining it beyond the original 2015 HUD seed grant.
 - Awarded an additional 81 project-based vouchers (PBVs) to eight proposed developments through a new February 2020 RFP, for a total of 145 vouchers awarded from this newly expanded pool of 150.
 - The first four developments, containing a total of 34 regional project-based vouchers, closed on their financing, with signed Agreements to enter into a Housing Assistance Payments contract (AHAPs) for the project-based vouchers, and began construction.
- Fair Housing Group continued its analysis of Low Income Housing Tax Credit awards/applications, showing that DHCD's 2019 removal of opportunity-area incentives drove the share of Baltimore-area 2019 tax credit awards in Communities of Opportunity down to 33 percent.
- Informed by that analysis, the Fair Housing Group, including PHAs, submitted two rounds of comments on the Maryland DHCD draft 2020 Qualified Allocation Plan and Program Guide, ultimately winning the following changes:
 - Two-point incentive for family or intergenerational homes in Communities of Opportunity in the Baltimore and Washington DC metropolitan areas (although capped at only two projects).

- Five points for Choice Neighborhood developments – the redevelopment of Perkins and Somerset Homes – that are also twinning projects of at least 150 units.
- Reduction in minimum units to 120 to qualify as a twinning project for earning direct leveraging points.
- No points for pushing PHAs to target project-based vouchers to households with incomes below 30% of area median income.
- Fair Housing Group held periodic discussions with the new Fair Housing Action Center of Maryland, which is working to carry on the education, training, and paired testing work of Baltimore Neighborhoods, Inc. (BNI). Several Fair Housing Group jurisdictions supported the Fair Housing Action Center with Community Development Block Grant (CDBG) funds.
- Fair Housing Group submitted comments on proposed regulations:
 - Concerns in March 2020 about HUD’s proposed rule regarding affirmatively furthering fair housing.
 - Opposition in April 2020 to proposed revisions to Community Reinvestment Act regulations.
- While meeting less frequently, the BMC Housing Committee continued to be a forum for discussing key fair housing-related issues:
 - Maryland Transit Administration presented at the November 2019 Housing Committee meeting regarding the Regional Transit Plan for Central Maryland.
 - Housing Committee held regular, virtual meetings in spring 2020 regarding housing agency responses to the COVID-19 pandemic, sharing information on local rent-relief programs and writing an April 8 letter to Maryland Housing Secretary Kenneth Holt urging him to provide statewide rent relief.
- Fair Housing Group submitted comments on draft Regional Transit Plan for Central Maryland in June 2020 urging definition of transit-oriented development to include a mix of incomes, including deep affordability.
- Most PHAs in region are using differential voucher payment standards to enable voucher holders to rent homes in opportunity areas. Baltimore City and Baltimore County using exception payment standards (EPS) for higher opportunity census tracts. Anne Arundel moved from EPS to small-area fair market rents (SAFMRs) beginning July 1, 2020. Howard County planning to move from EPS to SAFMRs during FY 2021.
- Fair Housing Group continued to meet monthly to coordinate implementation of 2012 AI and development of 2020 AI and agreed to increase CDBG contributions to a total of \$60,000 per year to support housing policy coordinator position at BMC.
- BMC and Fair Housing Group again compiled an accomplishments list to aid jurisdictions in reporting progress through Consolidated Annual Performance and Evaluation Reports (CAPERs).

Contact with questions:

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Detailed Table of FY 2013-2020 Actions/Accomplishments

Legend

Text	Regional Fair Housing Action Plan Steps from 2012 AI – Regional Section
Text	Implementation Measures & Outcomes

✓ = Completed action/outcome

Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY 2013	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020
a. Actions to preserve the supply of affordable rental housing for families: i. On a regional basis, support a replacement policy that encourages the region to work together to: 1. Preserve the number of affordable housing units available by replacing vacant units or creating equivalent units in opportunity areas whenever economically feasible, and/or 2. Provide housing choice vouchers, subject to funding availability, relocation assistance and mobility counseling for displaced families within the region.								
Convened public housing authorities (PHAs) several times, developing initial regional plans for addressing portability and exception payment standards.	✓	✓	✓					
Recommendation regarding regional replacement policy included in draft Opportunity Collaborative Regional Housing Plan		✓	✓					
Draft Regional Rental Home Affordability Preservation Policy circulated to area housing agencies and stakeholders			✓					
BMC made substantial progress in compiling a new regional database of affordable rental units, drawing on the inventory created for the Baltimore Regional Housing Plan, along with the National Housing Preservation Database and HUD's multifamily and Section 8 contracts database				✓				
Replacement policy informed by financial realities in place, along with regional database housed at BMC of affordable rental unit inventory.					✓			
Added Low Income Housing Tax Credit data from Maryland DHCD and project-based voucher data from PHAs to database. Began adding accessibility and affordability level information. Vetted records with local governments and PHAs in FY18. Continue refining database and adding information on subsidies and accessibility						✓	✓	

Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY 2013	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020
Letter template created, via BMC's request, for agencies, developers, and organizations to request copy of advance notice of subsidy opt-out that owners send to Maryland DHCD, including under Maryland Assisted Housing Preservation Act and federal Low Income Housing Preservation and Resident Homeownership Act (LIHPRHA).						✓		
Outcome: Regional Rental Home Affordability Preservation Task Force generally continued to meet at least twice per year, although not during the preparation of the 2020 Regional AI. Attention focused on enforcement of the Maryland Assisted Housing Preservation Act.					✓	✓	✓	
As discussions with Md. DHCD re: MdHousingSearch.org move forward, explore option to upload database information to their existing service at certain intervals (e.g. annually). Began those discussions in FY 2016.				✓				
<p>b. Actions to expand the supply of affordable rental housing for families in opportunity areas:</p> <p>i. Encourage the State of Maryland to revise its QAP and other vehicles for affordable housing to:</p> <ol style="list-style-type: none"> 1. Create a set-aside for tax credit projects in opportunity areas of the Baltimore region 2. Give preference to family units in opportunity neighborhoods 3. Eliminate local approval requirements, and 4. Create incentives for scattered site tax credit projects. 								
<p>Submitted five rounds of comments on new Maryland Qualified Allocation Plan (QAP).</p> <p>Outcome: Changes include:</p> <ul style="list-style-type: none"> • No local council resolution required for Low Income Housing Tax Credit projects • Scoring points equalized for Community Impact Projects and projects in Communities of Opportunity • For persons with disabilities (PWD): <ul style="list-style-type: none"> ○ New requirement for 5% of units for PWD in non-elderly projects, and point incentives up to 20% of units ○ Points awarded for subsidies to bring affordability down to 30% of area median income (AMI). • Boost in point scoring for projects that include units with 2-3 or more bedrooms for families with children • Enabled scattered site projects in communities of opportunities to apply for an exception to site control requirements 	✓							

Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY 2013	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020
Sent letter of support to Housing of Delegates Environmental Matters Committee Chair for House Bill 453: Multifamily Rental Housing Programs Efficiency Act. Outcome: Bill passed; streamlined many Maryland housing programs and eliminated local resolution requirement and veto capability. DHCD revised QAP in 2014 to reflect legislative changes.		✓						
<p>Met with Secretary Holt in September 2015 and sent follow-up letter advocating for a set-aside for affordable family housing in high opportunity areas. 2016 revisions to QAP do not include a set-aside, but do include other fair housing advances:</p> <ul style="list-style-type: none"> • Lease must require non-disabled tenant to move from a unit that meets Uniform Federal Accessibility Standards (UFAS) to another unit (if available) to make the UFAS unit available to a household that needs those features. • Developers can use project funding sources to finance up to 120% of “as is” value for family developments in opportunity areas (compared to 100% for others). • Site control is waived for scattered-side opportunity projects. • Revitalization plan requirements made stricter for non-opportunity development. • Family developments qualify for 30% boost in tax credit value. • Direct leveraging points are easier to earn for family opportunity developments. • Family developments within one mile of a rail or bus stop (compared to ½-mile for other non-rural developments) earn full 8 points for transit-oriented development. • Only family opportunity preservation developments can earn the full four preservation points, one more point than other preservation efforts. 				✓				

Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY 2013	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020																											
<p>Monitor implementation of updated QAP, including Baltimore-area’s share of credits: Outcome: Maryland QAP incentives over the 2010s have had a significant impact, both on the share of Baltimore-area 9% Low Income Housing Tax Credits that are awarded to general occupancy housing in Communities of Opportunity and on the share of Maryland’s tax credits that are awarded in the Baltimore region. Strong 2016 statewide incentives for family housing in Communities of Opportunity dramatically increased the share of Baltimore-area credits awarded in those areas but also served as a strong incentive for awards in rural parts of the state, likely because of low land costs. 2018 QAP Baltimore-area incentives designed to fulfill DHCD’s 2017 Baltimore-area fair housing Voluntary Conciliation agreement drove credits to Communities of Opportunity in the Baltimore region, funding more than 800 units there. When those incentives were dropped in 2019, the share of Baltimore-area credits awarded to family housing in Communities of Opportunity plunged as well, from 94% to 33%.</p> <div data-bbox="134 711 1236 1385"> <table border="1"> <caption>Maryland LIHTC Trends</caption> <thead> <tr> <th>Year</th> <th>Family Oppty Share of Total Baltimore Area Credits (%)</th> <th>Total Balt Area Share of Statewide Credits (%)</th> </tr> </thead> <tbody> <tr> <td>2011 Awards</td> <td>11</td> <td>63</td> </tr> <tr> <td>2012 Awards</td> <td>7</td> <td>62</td> </tr> <tr> <td>2013 Awards</td> <td>0</td> <td>55</td> </tr> <tr> <td>2014 Awards</td> <td>20</td> <td>50</td> </tr> <tr> <td>2015 Round Awards</td> <td>15</td> <td>68</td> </tr> <tr> <td>2016 Round Awards</td> <td>70</td> <td>35</td> </tr> <tr> <td>2018 Awards</td> <td>94</td> <td>81</td> </tr> <tr> <td>2019 Awards</td> <td>33</td> <td>62</td> </tr> </tbody> </table> </div>	Year	Family Oppty Share of Total Baltimore Area Credits (%)	Total Balt Area Share of Statewide Credits (%)	2011 Awards	11	63	2012 Awards	7	62	2013 Awards	0	55	2014 Awards	20	50	2015 Round Awards	15	68	2016 Round Awards	70	35	2018 Awards	94	81	2019 Awards	33	62		✓	✓	✓	✓	✓	✓	✓
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Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY 2013	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020
Work with other coalitions and groups as needed to advocate for any additional changes to the QAP that may be needed, including opportunity area set-asides, preferences for family units in opportunity neighborhoods, and incentives for scattered site projects that address impediments to fair housing choice.		✓		✓			✓	✓
Outcome: Some changes to QAP based on comments.	✓	✓						✓
c. Actions to educate elected officials on affirmatively furthering fair housing.								
i. Work with HUD, the Maryland Commission on Civil Rights, BMC or all three to conduct AFFH workshops for elected officials of the participating jurisdictions.								
Requested funding through HUD 2013 Fair Housing Initiatives Program (FHIP) for two workshops such as described below and fifteen one-on-one educational meetings with elected officials.	✓							
Outcome: Using 2013 FHIP funding, organized two workshops on local government legal obligations to affirmatively further fair housing. The first, May 20, 2014 at Baltimore Metropolitan Council, was attended by 38 people. 32 attendees were local government staff, including two county attorneys and seven other local law department staff. The second, on August 15, 2014 at Maryland Association of Counties (MACO) conference, was attended by 35 people, including three county councilmembers and one candidate. In addition, we met individually or in small groups with twenty local officials, including four Baltimore City Council members, four Howard County Council members, Harford County’s new Housing Director, and seven local government legal staff, including Harford’s new County Attorney and municipal attorneys for Bel Air, Aberdeen, and Havre de Grace.		✓	✓					
Three years of funding included in HUD Regional Project-Based Voucher program for new “Consider the Person”-style education materials on affordable housing more generally in opportunity areas – successful examples, what makes them successful, possible benefits for the community, why they help fulfill the Fair Housing Act. Began outreach in FY 2017, including dialogue with Enterprise Community Partners to use their housing-messaging research, to create “story of us” materials around high opportunity communities that include affordable housing. Continued outreach in FY 2018, including conversation with management at an affordable property in a high opportunity area in the region. Hiatus in work during development of 2020 Regional AI.				✓	✓	✓		

Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY 2013	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020
Held another educational session at BMC in December 2017, similar to May 2014 workshop above, for high-level local government law and planning officials regarding the duty to affirmatively further fair housing. 28 officials attended, including seven planning staff from four jurisdictions, two law department staff, and nine cabinet-level officials from all six jurisdictions represented. Participants heard briefings on recent fair housing conciliation agreements from Baltimore County and Maryland DHCD.						✓		
Invite elected officials and local government attorneys and other key staff to another conference on fair housing. Expected outcome: Elected officials and/or local government attorneys attend.								
Fact sheets created on Supreme Court disparate impact ruling & new HUD rule re: affirmatively furthering fair housing (AFFH) for law departments and elected officials.				✓				
Meeting with Howard County Attorney Gary Kuc, presentations at National Association of Housing and Redevelopment Officials (NAHRO) and Maryland Association of Housing and Redevelopment Agencies (MAHRA) meetings and at Baltimore City Vacants to Value Summit to educate on impact of disparate impact Supreme Court ruling and new HUD AFFH rule				✓				
d. Actions to expand the supply of accessible and affordable housing:								
i. Determine the unmet need for affordable, accessible housing for persons with mobility impairments in the Baltimore Metropolitan Area.								
Ensured through request for proposals (RFP) and process that Opportunity Collaborative housing plan consultant is working to determine unmet need.	✓							
Outcome: Unmet need for accessible, affordable housing set at 14,000 in Regional Housing Plan. This is not a precise number, given that it does not <i>per se</i> consider accessible features of the home. Instead, it prorates DHCD's figure of overall affordable need for those at 30% area median income (AMI) based on percentage of population with a mobility impairment.		✓						
ii. Take steps to address the identified unmet need for affordable, accessible housing for persons with mobility or sensory impairments in the Baltimore Metropolitan Area, which may include increasing the percentage of newly constructed rental housing units that must be made accessible for wheelchair users in accordance with the governing standards in place, and/or requiring that some percentage of newly constructed residential units meet universal design standards.								
New Maryland QAP establishes 5% threshold requirement for units for persons with disabilities (PWD) in non-elderly projects and point incentives up to 20% of units; also awards points for subsidies to bring affordability down to 30% of area median income (AMI).	✓							
Began adding information on accessibility in BMC's Preservation Database in FY 2018. Complete by the end of FY 2019.						✓	✓	

Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY 2013	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020
Consider urging adjustments to current Maryland law requiring a higher percentage of newly constructed or rehabilitated units to be accessible, or a new requirement for universal design standards. Expected outcomes: Consideration of new standard; urge potential changes if needed.								
iii. Sponsor informational and education sessions for those local jurisdictions in the region that do not have inclusionary zoning laws. The sessions would focus on using such legislation to require that a percentage of all newly constructed housing units be affordable to low and moderate income households, and on tools that may be used as incentives to create affordable housing, such as public infrastructure subsidies, density bonuses and tax increment financing.								
Funding to work with Innovative Housing Institute to conduct these sessions requested in 2013 application for Fair Housing Initiatives Program (FHIP) request to HUD	✓							
Outcome: Two inclusionary zoning tours and roundtable discussions held. June 4, 2014 event was attended by 18 people, including local government staff from four jurisdictions. June 12, 2015 event was attended by 40 people, including a State delegate, a Baltimore City Councilman, three planning directors and other local government staff from all six of the region's county-level jurisdictions as well as the City of Annapolis.		✓	✓					
iv. Convene a meeting with the State of Maryland Department of Housing and Community Development, which already maintains a database of apartments and identifies units that are wheelchair accessible, to discuss steps that may be taken that will result in more landlords listing their units in the State database, especially landlords with units that are accessible or have accessible features. Such steps may include, but not be limited to, conducting regional outreach and education to property managers on the importance of submitting information regarding accessible units to the database. Explore how the database may be improved and/or linked to services like socialservice.com.								
Meeting held with DHCD to explore joint work to promote Maryland Housing Search; funding to promote use requested in 2013 FHIP proposal.	✓							
Meetings held with Social Serve (who operates Md. Housing Search), advocates for people with disabilities, Md. Affordable Housing Coalition Property Managers Committee, and DHCD to explore possible improvements to Md. Housing Search. DHCD agreed to write a letter to owners urging them to list available Uniform Federal Accessibility Standard (UFAS) units. Also met with Md. Multi Housing Association and representatives from ForRent.com.			✓					

Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY 2013	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020
Maryland Disability Law Center did some testing of searchable “Disability Access” icon on ForRent.com and ApartmentGuide.com. Rents too expensive for their clients. We will need to focus on MdHousingSearch.org.				✓				
Through several calls and meetings with Md. DHCD, and working with fair housing and disability stakeholders, we compiled a list of suggested improvements to MdHousingSearch.org. Additional conversations resulted in creation of Advisory Committee and some prioritization of improvements in potential work plan for DHCD and Social Serve.				✓				
Additional suggestions made by Fair Housing group and advocates regarding making affirmative fair housing marketing requirements clearer to LIHTC applicants and awardees in DHCD forms and applications and for making Md. Housing Search a more effective affirmative fair housing marketing tool.					✓			
Continued to follow up with Maryland DHCD on affirmative fair housing marketing suggestions and suggestion that Md. Housing Search automatically populate Fair Housing Act-required accessibility features based on age and type of structure. Results still pending.						✓		
Expected outcome: Improvements to MdHousingSearch.org, making it a more effective tool for people to find available rental units and for developers, jurisdictions, and PHAs to fulfill their affirmative fair housing marketing requirements implemented in FY 2019 and thereafter.								
e. Organizational strategies for inter-jurisdictional cooperation and collaboration relative to fair housing:								
i. Formalize the regional efforts to address fair housing issues through a formal memorandum of understanding (“MOU”), entered into by Anne Arundel, Baltimore, Harford and Howard Counties and Baltimore City (the “Baltimore Regional Fair Housing Group” or the “Group”). Pursuant to the MOU, each jurisdiction would address the regional issues by committing staff time to meet on a regular basis and financial resources, as available, such as local entitlement funds, competitive FHIP funds, and Sustainable Communities Initiative planning funds to carry out regional actions to address fair housing impediments. Funds received would be made available for uniform fair housing testing, education and outreach throughout the region.								
MOU signed; staff coordinator hired; Fair Housing Group met 11 times, including one meeting with HUD Region III Administrator Jane Vincent and one with MTA Administrator Ralign Wells	✓							
Representatives of Baltimore Regional Fair Housing Group meet at least every other month to coordinate on carrying out this plan. Expected outcome: Regular meetings throughout work program		✓	✓	✓	✓	✓	✓	✓

Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY 2013	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020
Fundraising subcommittee established with Realtors, Maryland Commission on Civil Rights (MCCR), and Baltimore Neighborhoods, Inc. (BNI). Applied with three nonprofit partners (BNI, CPHA, Innovative Housing Institute) and MCCR for 18-month, \$125,000 Fair Housing Initiatives Program (FHIP) grant to produce and distribute educational materials, educate elected officials and housing professionals, expand online information on units accessible for people with mobility impairments, and extend coordinator position. Awarded \$125,000 FHIP grant by HUD	✓	✓						
Unsuccessfully applied for 2014 FHIP grant, but local governments agreed to double their CDBG contributions to regional work, and Baltimore Regional Transportation Board is devoting flexible transportation funds, if needed, to continue position. MOU signed to continue coordination for FY 2016, 2017, and 2018.			✓	✓				
Third MOU signed to continue regional coordination								✓
Most signatures gathered on an amendment to third MOU to increase annual support of BMC AI implementation coordination to a total of \$60,000 for FY 2021-2023.								✓
Paired testing in place, either locally or federally funded, in each jurisdiction FY 2015 – FY 2018.			✓	✓	✓	✓		
Held discussions with Baltimore Neighborhoods, Inc. (BNI) and developed new reporting form in FY 2017 in order to track follow-up in testing more effectively. Local government funders of testing began to require use of new form in FY 2018. Continued conversations with Fair Housing Action Center of Maryland in FY 2019 and 2020, including suggesting the use of the form in paired testing slated to get underway in FY 2021.					✓	✓	✓	✓
Shared our work on the Baltimore Regional AI, including implementation and intention to conduct a Regional Assessment of Fair Housing (AFH) under the new HUD affirmatively furthering fair housing rule, with Metro Washington Council of Governments (WashCOG) at March WashCOG meeting on complying with new HUD rule.				✓				
Consulted with WashCOG and Atlanta Regional Commission regarding plan to conduct a Regional Assessment of Fair Housing (AFH) under the new HUD affirmatively furthering fair housing rule.					✓			

Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY 2013	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020
Continue to seek funds to conduct education and outreach and to continue coordinated work beyond Opportunity Collaborative grant. Support organizations applying for grants that would move region toward uniform fair housing testing and other enforcement measures against problematic practices pertaining to non-rent-payers, such as residency restrictions based on credit checks. Expected outcomes: Carry out program(s) if grant(s) received. Support private enforcement applications that fill in gaps in testing regionally. Aggressively seek funding to sustain coordinated regional work for fiscal year 2016 and thereafter.			✓	✓	✓	✓	✓	✓
Fair Housing Group submitted comments expressing concerns about draft HUD regulation regarding affirmatively furthering fair housing and in opposition to proposed new regulations for the Community Reinvestment Act.								✓
ii. The Baltimore Regional Fair Housing Group will set goals each year and establish a schedule, which prioritizes the action steps recommended under this plan and articulates the scope of work and expected outcomes for each action. The Group's regional accomplishments will be reported in each participating jurisdiction's CAPER.								
Conducted three focus groups with fair housing stakeholders and developed year-by-year Implementation Plan for Fair Housing Action Plan.	✓							
Expected outcome: Updated Implementation Plan each year, noting past progress and making expected outcomes more specific where possible.		✓	✓	✓	✓	✓		✓
Use Implementation Plan to inform local Annual Plans and to report progress through Consolidated Annual Performance and Evaluation Reports (CAPERs). Expected outcomes: Elements of this plan included in local Annual Plans; progress reported in local CAPERs each year.		✓	✓	✓	✓	✓	✓	✓
Letter sent to HUD in February conveying intent to carry out Regional Assessment of Fair Housing (AFH) under new HUD fair housing rule. MOU completed, including City of Annapolis and four PHAs, formalizing intent to carry out Regional AFH by October 2019 with Anne Arundel County as lead jurisdiction. MOU enables Harford County to complete AFH with everyone in 2019, rather than 2016. MOU submitted to HUD in June 2016.				✓				
Explored interest from remaining PHAs (Havre de Grace, Carroll County, Westminster) in participating in Regional AFH. Havre de Grace PHA is now participating in Regional Analysis of Impediments to Fair Housing Choice (AI) following the Regional AFH process and tool.				✓	✓	✓		
All Regional AFH participants either updated their Community Participation Plans to include new AFH requirements or have updates in progress. Given HUD 2018 guidance, MOU among participants now applies to Regional AI, although can apply to Regional AFH, if HUD guidance changes. MOU includes roles and needed funding to complete Regional AI/AFH.						✓		

Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY 2013	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020
Conversations held in FY 2015 and FY 2016 with interested stakeholders in Howard County and Baltimore City regarding Oak Park-style intentional integration program. Following October 2016 Columbia Association-sponsored visit by Oak Park Regional Housing Center executive director Rob Breymaier, BMC helped support work by interested Howard County stakeholders to create a committee to explore creation of a Columbia Housing Center on Oak Park model. Housing Center ultimately became a Howard County action item in 2020 Regional AI and received CDBG funds for FY 2021.			✓	✓	✓	✓	✓	✓
iv. Examine the Section 8 porting procedures of each jurisdiction and, to the extent they are inconsistent, make them consistent. Work with HUD to convene a meeting to discuss porting procedures and regional cooperation. Request additional financial assistance from HUD to allow jurisdictions to implement increased payment standards to encourage moves to opportunity areas. If HUD provides the requested financial assistance, implement the increased payment standards.								
Convened public housing authorities (PHAs) in the region regularly to discuss obstacles to voucher porting and leasing in high opportunity communities.	✓	✓	✓	✓	✓	✓		
Worked with PHAs to convene meeting with HUD Region III Administrator Jane Vincent regarding potential HUD support for reforms to facilitate voucher porting.	✓							
Best practice research conducted regarding regional voucher cooperation, including April 2014 delegation learning trip to Chicago and continued contact with Chicago and other metro areas such as Denver. Results, including possible regional project-based voucher initiative, shared with PHAs and Housing Committee.	✓	✓						
Six PHAs submitted joint request to HUD to allow jurisdictions to implement increased payment standards to encourage moves to opportunity areas. Letter included request to discuss resources needed for such moves. Outcome: 120% Exception Payment Standards (EPS) approved by HUD; 130% EPS denied.			✓					
PHAs, including Baltimore Regional Housing Partnership, worked with BMC to successfully challenge HUD's proposed reduction of higher housing voucher payment standards for Columbia and regional loss of 50 th percentile fair market rents (FMRs). Individual PHAs requested higher EPS for federal fiscal year (FFY) 2016.				✓				
With help from Baltimore Regional Housing Partnership (BRHP), in FY 2016 explored impact of HUD's hypothetical zip code-based small-area payment standards and found significant adverse effect in high opportunity areas because of large zip code areas and fact that they are calculated at 40 th percentile. Selected PHAs received HUD approval for Exception Payment Standards in FY 2017 and FY 2018.				✓	✓	✓		

Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY 2013	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020
<p>In FY 2018, explored potential impact of loss of 50th percentile rents on possible payment standards in FY 2019. Outcome: Baltimore City and Baltimore County using exception payment standards (EPS) for higher opportunity census tracts. Anne Arundel moved from EPS to small-area fair market rents (SAFMRs) beginning July 1, 2020. Howard County planning to move from EPS to SAFMRs during FY 2021.</p>						✓	✓	✓
<p>Examined porting procedures in detail and began to reconcile in FY 2015. In FY 2016 all PHAs agreed to accept sending PHA criminal background check. Booklet describing remaining differences in bedroom size and interim policies created in FY 2017 and edited in FY 2018. Outcome: In FY 2019, booklet printed and distributed, and standardized briefing developed and implemented.</p>			✓	✓	✓	✓	✓	✓
<p>Explore inter-jurisdiction voucher moves without porting by tenant, analyzing challenges of administration, finances and local governance. In FY 2019, explore sending all intra-regional ports to the Baltimore Regional Housing Partnership (BRHP). Expected outcome: Program in place by end of FY 2020</p>			✓	✓				
<p>Five PHAs and BMC submitted letter to HUD urging them to fund Baltimore's participation in a multi-metro-area program through which Baltimore would establish a regional project-based voucher (PBV) program to encourage affordable housing construction in areas of opportunity. HUD responded with request for proposal, which six PHAs, the Baltimore Regional Housing Partnership (BRHP), and BMC submitted in October 2015. HUD funded three-year, \$550,000 start-up to this new program in December 2015. First RFP issued in conjunction with 2016 Md. DHCD Low Income Housing Tax Credit round. 16 vouchers conditionally awarded in October 2016 to Dorsey Overlook development proposed for Ellicott City. New RFP issued in May 2017, not tied to LIHTC process. New web page on BMC site describes new Regional PBV Program.</p>			✓	✓	✓			
<p>In FY 2018:</p> <ul style="list-style-type: none"> • Awarded 21 vouchers to two proposed developments under 2017 RFP. • Rescinded 2016 award of vouchers to Dorsey Overlook because school capacity obstacle led developer to change development to be senior-only. • Issued 2018 RFP, including existing units for the first time. • Awarded 31 additional vouchers to five proposed developments under 2018 RFP. • Received HUD approval to extend grant-funded program into a fourth year with existing grant funding level. 						✓		

Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY 2013	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020
Outcome: Amendment to Intergovernmental Agreement signed February 2020 adding 50 vouchers to original pool of 100 and committing PHAs to contribute a total of \$60,000 per year to sustain central coordination of program by BMC housing policy coordinator beyond HUD seed grant. 145 vouchers awarded as of June 2020, all in high opportunity areas of region as defined by BRHP.							✓	✓
f. Actions to encourage the inclusion of public transportation in opportunity areas of the region:								
i. Encourage entities engaged in transportation planning to involve housing agencies, housing advocates and developers of affordable housing in their planning and policy development processes, including obtaining their comments on specific programs, initiatives and policies released by local, state and federal transportation agencies and on funding strategies.								
ii. Encourage coordination between transportation and housing agencies to more effectively align housing and transportation investments and resources and to reflect both state and federal policies that are requiring more integrated approaches to community revitalization and development.								
Outcome: Worked with MTA, local transit agencies, and Vehicles for Change to conduct five informational discussions with local housing agencies, housing advocates, and developers of affordable housing on transit planning, funding, and policy development processes. Included in sessions information on route and schedule planning cycles for MTA and local transit agencies, yearly capital and operating budget schedule, and federally-required regional planning processes. Also included information on fair housing for transportation planners and agencies. <ul style="list-style-type: none"> ○ Held discussions with local housing agencies in four of five local HUD entitlement jurisdictions. Scheduled fifth discussion in Harford County ○ Held discussion with ABCD Network. Offered discussions to Maryland Affordable Housing Coalition and Baltimore Regional Housing Campaign. 	✓							
Outcome: Held discussion in Harford County; compiled notes & feedback from all discussions		✓						
Outcome: Continued routine interaction through discussions at Housing Committee regarding recommendation language for Regional Housing Plan/Fair Housing Equity Assessment. Final report includes recommendation that transit service better connect job seekers to job centers.		✓	✓					

Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY 2013	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020
Outcome: List of interested housing agencies, advocates and developers compiled and submitted to relevant transportation planning agencies, such as MTA, Md. Dept. of Transportation (MDOT), and BMC, for notice of opportunities to be involved in and/or comment on planning processes and policy development.				✓				
Briefing of Housing Committee in October 2016 by then-MTA planning director Kevin Quinn re: proposed BaltimoreLink bus line changes, followed by discussion. Follow-up presentation on BaltimoreLink implementation so far at May 2018 Housing Committee meeting by MTA director of service development Tom Hewitt. May 2018 meeting included discussion of new transportation elements of 2018 Maryland Qualified Allocation Plan					✓	✓		
Expected outcome: Participation by housing stakeholders not previously included in transportation planning and policy development processes.						✓		
Follow initial informational discussions described above with routine interaction and cooperation described under e.iii. above. Same expected outcomes through Opportunity Collaborative process and beyond.				✓	✓	✓	✓	✓
iii. Encourage MTA to create a bus line that circles the Baltimore beltway and includes multiple stops.								
iv. Encourage MTA to review public transportation routes to ensure that:								
1. Service is provided between residential opportunity areas and areas of employment opportunity and job growth for both first shift and second shift workers								
2. Service is provided between affordable housing resources and areas of employment opportunity and job growth for both first shift and second shift workers								
3. Service is provided between residential opportunity areas and educational institutions and health care facilities, and								
4. The various transportation systems are connected in order for riders to move easily from one system to another.								
Outcome: Formally made recommendations above to MTA through March 2013 letter and May 2013 follow-up meeting with MTA Administrator Ralign Wells.	✓							
Followed letter and meeting above with discussions described under f.i. and ii.	✓							
Jurisdictions participated in Howard County's EmpowerTrans Demonstration Project for the Opportunity Collaborative, publicizing involvement opportunities and helping Howard County and partner CPHA explore innovative ways to connect low income workers to jobs.		✓						
Jurisdictions participated in MTA's Bus Network Improvement Project (BNIP) to promote connections described in Action Steps above		✓	✓					

Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY 2013	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020
BMC received HUD Sustainable Communities grant, including funds to create a Regional Housing Plan, hire a staff coordinator for this Action Plan, and explore regional funding mechanisms. Outcomes: Grant received; housing policy coordinator hired; Opportunity Collaborative Regional Housing Plan consultant team retained and work on plan begun.	✓							
Regional Housing Plan finalized November 2014 through Baltimore Opportunity Collaborative and included in summary form in June 2015 Regional Plan for Sustainable Development. Outcome: Elements of Housing Plan implemented following release. Regional Project-Based Voucher program, regional affordability database, and racial diversity preservation work all moved forward FY 2016-2020.		✓	✓	✓	✓	✓	✓	✓
Pursue any available and fair housing-related HUD Sustainable Communities implementation grants following current planning grant. Outcome: No HUD Sustainable Communities implementation funds became available in 2014 or later.		✓	✓	✓	✓	✓	✓	✓
g. Legislative actions								
i. Advocate for the adoption of a statewide law that would include source of income as a class protected from discrimination.								
Three jurisdictions submitted testimony on source-of-income legislation in Maryland General Assembly in 2013 and two jurisdictions supported in 2016 and 2017. (Legislation not introduced in 2014, 2015, or 2018.)	✓			✓	✓			
Continued advocacy for a state law that adds people with source of income such as housing choice voucher as class protected from housing discrimination. Outcome: State Source of Income law passed FY 2019!							✓	
Discuss ways of recruiting landlords to participate and pursue, if appropriate.								
h. Education and Outreach								
i. Continue to hold routine regional education events on fair housing issues, especially as a means by which to educate housing professionals on relevant fair housing issues.								
Outcome: Held educational event with author Antero Pietila (<i>Not in My Neighborhood</i>), HUD, and advocates. 150 people attended December 2012 event, expanding our list of potential fair housing stakeholders.	✓							
Outcome: Used transportation-related discussion (f. i-ii. above) as opportunity to educate housing professionals in ABCD Network on fair housing issues. Offered same event to Maryland Affordable Housing Coalition and Baltimore Regional Housing Campaign.	✓							
Outcome: Used inclusionary zoning tours and roundtable discussions (d.iii. above) as additional opportunities to educate housing professionals on fair housing issues.		✓	✓					
Outcome: Worked with Baltimore Neighborhoods, Inc. (BNI) to conduct fair housing training for property managers April 21, 2016, at BMC, attended by 63 people.				✓				

Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY 2013	FY 2014	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020
Carry out events above if funded. Continue to work with partners to develop schedule of educational events that relate to current fair housing issues in region. Outcome: Continued discussion of educational events with new Fair Housing Action Center of Maryland, but no new events since April 2016 event.		✓	✓	✓				
ii. Develop a brochure, to be distributed regionally and placed on each jurisdiction's website, and a training program to educate multi-family property managers and landlords, especially those that operate in multiple jurisdictions, and real estate agents on the different fair housing ordinances and their applicability across the region. Use the Howard County training package and agreement with the Howard County Association of Realtors as a model.								
Furthered efforts to increase housing choice and the number of Housing Choice Vouchers accepted by landlords throughout the region by supporting the ABCD Network's successful application to the Opportunity Collaborative to fund the Consider the Person media campaign demonstration project, and participated on the campaign's advisory board.	✓							
Updated Fair Housing Protections Chart from AI and distributed at Howard County Housing Fair.	✓							
Outcome: Worked with Baltimore Neighborhoods, Inc. and the Maryland Commission on Civil Rights to win HUD FHIP funds in 2013 and develop a menu of educational events and trainings for various types of housing professionals, including attorneys and housing counselors.	✓	✓						
Outcomes: Nine trainings conducted in FY 2015 with BNI and sometimes MCCR, attended by more than 120 housing counselors, attorneys, real estate agents, property owners and managers, and homebuilders. April 21, 2016 BNI training for property managers attended by 63.			✓	✓				
Outcomes: Used 2013 chart to develop an educational booklet to be distributed at events, and to educate housing providers about the various fair housing requirements in the region. English-language booklet created in late FY 2014, with more than 17,000 printed and more than 10,000 distributed to individuals thereafter. Spanish and Korean booklets created in FY2015 with more than 6,000 printed and more than 1,100 distributed to individuals so far. English, Spanish, and Korean language booklets posted on Opportunity Collaborative/ BMC and all five local government web sites.		✓	✓	✓	✓	✓		