

# FAIR HOUSING GROUP AI IMPLEMENTATION PLAN – FY 2024

9/29/2023

## FY 2023 Highlights

- Local governments in the Baltimore region contracted with Economic Action Maryland (the former Maryland Consumer Rights Coalition, having rebranded the work it previously carried out under the name Fair Housing Action Center of Maryland) and the Equal Rights Center to conduct the following:
  - Conducted 86 paired tests focused on housing source-of-income and lending discrimination, in addition to discrimination against persons with disabilities.
  - Held five fair housing trainings, serving 47 Baltimore-area property managers and owners and 95 total participants.
- BMC Housing Committee continued to be a forum for discussing AI implementation and other key fair housing and housing-related issues, including:
  - A talk with bank representatives of two new special purpose credit programs (SPCPs) available in the Baltimore region with the goal of promoting Black and Latino homeownership.
  - Housing supply constraints in the region with representatives of Bright MLS, Up for Growth, Arundel Community Development Services, and the National Association of Realtors.
  - Prince George’s County Dept. of Housing and Community Development (DHCD) director Aspasia Xypolia and consultant John Maneval discussing with us the County’s Right of First Refusal program for market-rate multifamily sales.
  - Updating this AI Implementation Plan and priority strategies for addressing racial homeownership gaps.
  - Hearing from leaders of housing affordability preservation efforts in Detroit and Washington, DC similar to our Preservation Task Force to see what we could learn from each other.
  - National Center for Smart Growth at the University of Maryland and Enterprise Advisors talking with us about their December 2022 State-mandated report for Maryland DHCD on racial disparities in Maryland’s housing market.
  - Deputy Planning Directors from Anne Arundel and Howard County’s discussing the housing elements of their latest comprehensive planning processes.
- The Regional Project-Based Voucher (PBV) Program continued, issuing our ninth request for proposals (RFP) in March 2023:
  - Two developments, Brock Bridge Landing in Anne Arundel County and Village at Blenheim Run in Havre de Grace, began construction this fiscal year, moving to join the four finished developments in three jurisdictions where 34 families currently live.
  - We needed to reclaim 20 vouchers from Station Overlook when that property was offered for sale for market-rate development and eight vouchers from Towns at Odenton, when no alternative financing plan emerged for that property. 93 vouchers are currently in use or committed, with another 100 available in the current RFP.
  - Public housing authorities (PHAs) and Baltimore Regional Housing Partnership renewed their financial support for the program for another three years (through FY 2026), including annual increases.

- Fair Housing Group jurisdictions and public housing authorities (PHAs) submitted joint comments on the development of the 2023 Qualified Allocation Plan, with mostly disappointing results in the draft released by Maryland DHCD in June 2023:
  - While DHCD expanded the Choice Communities development incentive to areas awarded planning grants, it also reduced the incentive from five points to two.
  - DHCD did not expand incentives for family developments in metro-area Communities of Opportunity, as we urged them to do again.
  - In terms of affordability preservation at the Year 15 investor exit, DHCD proposed only a required Year 15 plan by the applicant in its June draft, although it did impose effective requirements on the investor in the final QAP in September.
- The Regional Fair Housing Group pursued its priority strategies for tackling racial homeownership gaps:
  - Compiled chart of special purpose credit programs available in Baltimore and heard from Chase and TD Bank.
  - Updated priority strategies given work and information gathered to date.
  - 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.
  - 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 Regional Fair Housing Group analyzed Maryland DHCD data on LIHTC unit occupancy by race, showing that Black residents were able to access newer family units in Communities of Opportunity made possible by DHCD's 2017 voluntary conciliation agreement. Some individual properties still show a need for additional affirmative marketing.
- BMC has continued to produce a report of regional accomplishments each summer for inclusion in jurisdiction Consolidated Annual Performance and Evaluation Reports (CAPERs).

Contact with questions:

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### Legend

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

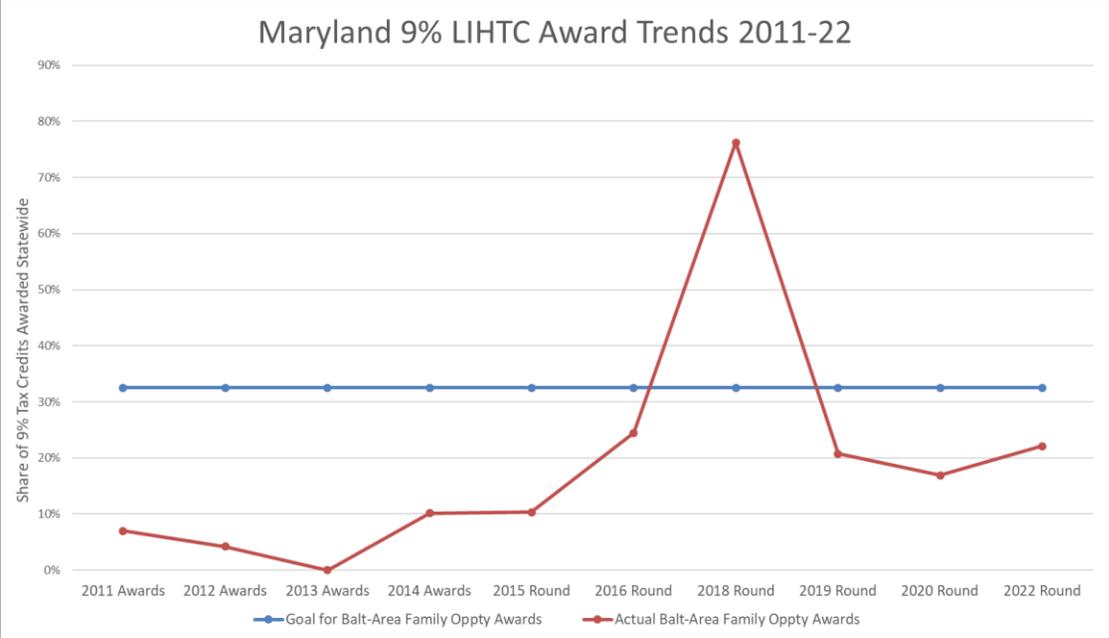
✓ = Completed action/outcome

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. Almost all jurisdictions have signed updated MOU for FY24-26, including 2% annual increase. Baltimore City to sign in early FY24.	✓	✓	✓	•	
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 held preliminary conversations on updating 2020 Regional AI. Prepare updated Regional AI/Equity Plan primarily in FY 2024; finish in FY 2025.			✓	•	•
<b>Expected outcome:</b> Strong progress on 2020 AI regional action items and new 2024 or 2025 Regional fair housing analysis with updated action plans for FY 2026-2030					•
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.		✓	✓	•	•
Began to hold enforcement coordination meetings with Maryland Commission on Civil Rights, local civil rights agencies, and Economic Action Maryland. Establish regular (perhaps monthly) meetings in FY24 to determine most effective methods of communication and coordination to maximize enforcement action.			✓	•	
<b>Expected outcome:</b> 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.			✓		
<b>Expected outcome:</b> 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.		✓			
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.			✓		
<b>Expected outcome:</b> 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.					•

Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
<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"> <li>a. Ensure the Baltimore metropolitan area receives at least 50% of Maryland tax credits awarded, reflecting the Baltimore area's proportion of the State's low income population.</li> <li>b. Award 65% of the region's credits to family developments in opportunity areas in order to address past inequities, while focusing remaining awards in comprehensive revitalization areas.</li> </ul>					
<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.</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>	✓				

Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025																																	
<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>  <table border="1"> <caption>Maryland 9% LIHTC Award Trends 2011-22</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>5</td></tr> <tr><td>2013 Awards</td><td>32.5</td><td>1</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>76</td></tr> <tr><td>2019 Round</td><td>32.5</td><td>21</td></tr> <tr><td>2020 Round</td><td>32.5</td><td>17</td></tr> <tr><td>2022 Round</td><td>32.5</td><td>22</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	5	2013 Awards	32.5	1	2014 Awards	32.5	10	2015 Round	32.5	10	2016 Round	32.5	25	2018 Round	32.5	76	2019 Round	32.5	21	2020 Round	32.5	17	2022 Round	32.5	22					
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<p><b>Expected outcomes:</b> 9% LIHTC awards FY 2021-2025 include 2300 units awarded in Baltimore region (768 so far, or 33%), including 1500 family units in areas of opportunity (313 so far, or 21%) and 800 units contributing to concerted community revitalization plans (455 so far, or 57%).</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>																																						
<p>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.</p>	✓																																					
<p><b>Outcome:</b> We did not receive an award.</p>																																						

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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		✓			
<b>Expected outcome:</b> 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 2023 recommendations to Maryland DHCD for 2023 QAP. Develop similar model language in FY24 for locally-funded affordability contracts (e.g., HOME funds, local funds) so that they facilitate preservation and avoid Year 15 investor exit problems. Set goals for use.			✓	•	
Track use of such language -- numbers of contracts that include it.				•	•
<b>Expected outcome:</b> Based on goals set in FY24				•	•
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.					
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 to invite input from one or more legal service providers and make any appropriate changes to policies.				•	
<b>Expected outcome:</b> 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.					

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 to invite input from one or more legal service providers and make any appropriate changes to policies.				•	
<b>Expected outcome: All PHAs implement any needed changes.</b>				•	
<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.	✓	✓			
<ul style="list-style-type: none"> <li>• 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.</li> <li>• Conducted an electronic survey of people who have received housing counseling in an effort to buy a home.</li> <li>• Compiled a chart with all State and local down payment assistance programs in the Baltimore region.</li> <li>• Learned about a new race-conscious mortgage product being developed by Neighborhood Housing Services-Baltimore in order to narrow Baltimore’s racial homeownership gap.</li> </ul>		✓			
<ul style="list-style-type: none"> <li>• Compiled chart of special purpose credit programs available in Baltimore and heard from Chase and TD Bank.</li> <li>• 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.</li> <li>• 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.</li> <li>• Updated priority strategies given work and information gathered to date.</li> </ul>			✓		

Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
Carry 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.				•	
<b>Expected outcome:</b> 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					
<b>Expected outcome:</b> 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.	✓				
BMC potentially use Preservation Database to conduct analysis of concentrations of multifamily housing in areas of opportunity to inform implementation of Central Maryland Regional Transit Plan as part of work exploring nexus of housing and transportation.				•	
<b>Expected outcome:</b> Seek application of any lessons learned from analysis. Continued 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.				•	•
<b>Expected outcome:</b> Any appropriate support by local governments for these explorations.				•	•

Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY 2021	FY 2022	FY 2023	FY 2024	FY 2025
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 annually 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.			✓		
<b>Expected outcome:</b> 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.	✓	✓			
As stated in #11 above, carry out focus groups exploring public attitudes toward housing growth, affordable housing, and transportation, including transit-oriented development.				•	
<b>Expected outcome:</b> 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.					
<b>Expected outcome:</b> 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.					
<b>Expected outcome:</b> 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.					

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Maryland Citizens Health Initiative presented to August 5, 2021 Housing Committee regarding the 2021 legislation establishing Health Equity Resource Communities.		✓			
Further meetings as useful.				•	•
<b>Expected outcome:</b> Act on any useful synergies between health care institutions and housing, as resources allow.				•	•
<i>Expand fair housing resources and compliance</i>					
<p>20. Continue to engage with Maryland DHCD to make www.MdHousingSearch.org an effective:</p> <ul style="list-style-type: none"> <li>a. Clearinghouse of publicly assisted and market-rate rental homes, including homes accessible to persons with disabilities,</li> <li>b. Affirmative fair housing marketing tool for homes assisted through Maryland DHCD and other agencies, and</li> <li>c. Viable tool for public housing authorities to refer their housing choice voucher holders, including those with disabilities.</li> </ul>					
Reiterated request to Maryland DHCD that Md. Housing Search automatically populate accessibility features based on Fair Housing Act requirements. Response still pending as FY 2022 closes.	✓	✓			
<b>Expected outcome:</b> 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.	✓	✓	✓	•	•
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.		✓	✓	•	•
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.		✓	✓	•	•
<b>Expected outcome:</b> Md. Housing Search is a reliable, up-to-date database of available apartment homes used by DHCD-assisted property owners for affirmative marketing and by low-income families and PHAs and voucher holders to find affordable places to live.				•	
21. All PHAs offer online rental resources beyond GoSection8.com, including market-rate resources such as Apartments.com and Zillow and, as it becomes more effective, Md. Housing Search.					

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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.				•	•
<b>Expected outcome:</b> All PHAs use a variety of apartment referral tools, including Md. Housing Search				•	
22. Review literature on criminal background and subsequent criminal activity – connected to assisted housing, if possible – to see what that research indicates the most justified criminal background standard for assisted housing should be.					
Internet search for studies conducted, revealing only one January 2019 study by Wilder Institute of 10,000 units of affordable housing in Minnesota and Wisconsin – “Success in Housing: How Much Does Criminal Background Matter?” It found no effect for many minor offenses, and that effects reduced to insignificance over 2-5 years for more major offenses	✓				
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.			✓		
Review HUD’s proposed new regulations and take appropriate action.				•	
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.			✓		
<b>Expected outcome:</b> BMC and Fair Housing Group to coordinate training in 2023.				•	
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.			✓		
<b>Expected outcome:</b> BMC and Fair Housing Group to work with Fair Housing Action Center of Maryland to sponsor trainings in spring and fall beginning fall 2023.				•	•

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.		✓			
<b>Expected outcome:</b> BMC to work with Maryland DHCD and other stakeholders to hold first training in fiscal year 2024 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.					
BMC and Fair Housing Group to update information in 2014 Fair Housing education booklets as part of 2024 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.				•	
<b>Expected outcome:</b> Solution implemented by 2024.					•