

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The Consolidated Annual Performance and Evaluation Report (CAPER) for City fiscal year (CFY) 2025 examines Baltimore City's efforts in meeting the housing and community development goals set forth in its current Consolidated Plan and in the companion Annual Action Plan (AAP). The Consolidated Plan helps guide and describe community development efforts in Baltimore City and serves as the application request for funding from four federal housing and community development programs. The AAP is the detailed listing of activities that implement strategies proposed in the Consolidated Plan. It is updated and annually submitted to the U.S. Department of Housing and Urban Development (HUD) while the Consolidated Plan is in force for a five-year period. This CAPER evaluates the fifth year of the five years covered by the Plan.

The CAPER primarily, and specifically, discusses the use of funds associated with four Federal programs: Community Development Block Grant (CDBG); Home Investment Partnership (HOME); Housing Opportunities for People With AIDS (HOPWA); and Emergency Solutions Grant (ESG). However, its scope extends to other Baltimore City activities and initiatives that relate to housing and community development. This report compares the City's actual performance during CFY 2025 - July 1, 2024, through June 30, 2025, to the performance proposed in the Consolidated and Annual Action Plans.

This CAPER is produced by using HUD's Integrated Disbursement and Information System (IDIS) based eCon Planning Suite. The Suite places tight limits on the number of characters that can be used in response to the HUD established CAPER questions. It is submitted to HUD electronically.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Assist HOs & LLs to Maintain Homes/Healthy Home	Affordable Housing	CDBG: \$ / General Fund: \$ / Other Federal - Lead: \$ / Private: \$ / State - Lead: \$	Homeowner Housing Rehabilitated	Household Housing Unit	4700	2761	58.74%	921	699	75.90%
Blight Elimination & Stabilization	Blight Elimination and Stabilization	CDBG: \$ / General Fund: \$ / Private: \$	Buildings Demolished	Buildings	1800	718	39.89%			
Blight Elimination & Stabilization	Blight Elimination and Stabilization	CDBG: \$ / General Fund: \$ / Private: \$	Other	Other	10	0	0.00%			
Code Enforcement	Non-Housing Community Development Code Enforcement	CDBG: \$ / Private: \$	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	15000	637714	4,251.43%	23800	12776	53.68%
Create/Increase Affordable Rental Housing	Affordable Housing	CDBG: \$ / HOME: \$ / LIHTC: \$ / Private: \$ / State - other: \$	Rental units constructed	Household Housing Unit	1800	592	32.89%	277	155	55.96%

Create/Increase Affordable Rental Housing	Affordable Housing	CDBG: \$ / HOME: \$ / LIHTC: \$ / Private: \$ / State - other: \$	Rental units rehabilitated	Household Housing Unit	750	111	14.80%	80	5	6.25%
Create/Increase Affordable Rental Housing	Affordable Housing	CDBG: \$ / HOME: \$ / LIHTC: \$ / Private: \$ / State - other: \$	Housing for Homeless added	Household Housing Unit	0	0		4	0	0.00%
Emergency Shelter & Serv. to Homeless Persons	Homeless	CDBG: \$ / ESG: \$ / Continuum of Care: \$29291862 / General Fund: \$ / Local - Journey Home: \$100000 / Private: \$ / State - Homeless Solutions Program: \$2111500 / State - other: \$1015606	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	25000	3465	13.86%	11675	715	6.12%

Emergency Shelter & Serv. to Homeless Persons	Homeless	CDBG: \$ / ESG: \$ / Continuum of Care: \$29291862 / General Fund: \$ / Local - Journey Home: \$100000 / Private: \$ / State - Homeless Solutions Program: \$2111500 / State - other: \$1015606	Homeless Person Overnight Shelter	Persons Assisted	50000	3068	6.14%	2509	2289	91.23%
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Emergency Shelter & Serv. to Homeless Persons	Homeless	CDBG: \$ / ESG: \$ / Continuum of Care: \$29291862 / General Fund: \$ / Local - Journey Home: \$100000 / Private: \$ / State - Homeless Solutions Program: \$2111500 / State - other: \$1015606	Homelessness Prevention	Persons Assisted	0	12871		1453	2730	187.89%
Housing for Special Needs Populations	Affordable Housing Non-Homeless Special Needs	CDBG: \$ / HOPWA: \$ / HOME: \$ / LIHTC: \$ / Other Federal Funds: \$ / Private: \$ / State - HIV/AIDS: \$441621	Rental units rehabilitated	Household Housing Unit	100	0	0.00%			

Housing for Special Needs Populations	Affordable Housing Non-Homeless Special Needs	CDBG: \$ / HOPWA: \$ / HOME: \$ / LIHTC: \$ / Other Federal Funds: \$ / Private: \$ / State - HIV/AIDS: \$441621	Homeowner Housing Rehabilitated	Household Housing Unit	0	248		2	126	6,300.00
Housing for Special Needs Populations	Affordable Housing Non-Homeless Special Needs	CDBG: \$ / HOPWA: \$ / HOME: \$ / LIHTC: \$ / Other Federal Funds: \$ / Private: \$ / State - HIV/AIDS: \$441621	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	3250	0	0.00%	1006	972	96.62%
Implement Fair Housing Practices	Affordable Housing	CDBG: \$ / Private: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0		3	3	100.00%
Implement Fair Housing Practices	Affordable Housing	CDBG: \$ / Private: \$	Other	Other	15	15	100.00%			
New Construction of homeownership units	Affordable Housing	CDBG: \$ / Private: \$	Homeowner Housing Added	Household Housing Unit	20	0	0.00%	21	3	14.29%

Preservation of Existing Affordable Rental Housing	Affordable Housing	HOME: \$ / LIHTC: \$ / Private: \$	Rental units rehabilitated	Household Housing Unit	500	0	0.00%			
Provide Housing Interventions for People Experienc	Affordable Housing Homeless	CDBG: \$ / HOME: \$ / ESG: \$ / Continuum of Care: \$ / LIHTC: \$ / Private: \$ / State - Homelessness: \$ / Youth Homeless Demonstration Program: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	1240	0	0.00%			
Provide Housing Interventions for People Experienc	Affordable Housing Homeless	CDBG: \$ / HOME: \$ / ESG: \$ / Continuum of Care: \$ / LIHTC: \$ / Private: \$ / State - Homelessness: \$ / Youth Homeless Demonstration Program: \$	Homelessness Prevention	Persons Assisted	1300	0	0.00%			

Provide Housing Interventions for People Experienc	Affordable Housing Homeless	CDBG: \$ / HOME: \$ / ESG: \$ / Continuum of Care: \$ / LIHTC: \$ / Private: \$ / State - Homelessness: \$ / Youth Homeless Demonstration Program: \$	Housing for Homeless added	Household Housing Unit	100	0	0.00%			
Public Facilities & Public Open Space Improvements	Non-Housing Community Development	CDBG: \$ / Private: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	600	6	1.00%	93	171	183.87%
Rehabilitation of primarily vacant/abandoned struc	Affordable Housing	CDBG: \$ / Private: \$ / State - other: \$	Homeowner Housing Rehabilitated	Household Housing Unit	70	6	8.57%	9	11	122.22%
Research, Planning, and Oversight of Formula Funds	Planning, Research and Admin	CDBG: \$ / HOPWA: \$ / HOME: \$ / ESG: \$ / Private: \$	Other	Other	61	0	0.00%	15	6	40.00%

Social, Economic & Community Development Services	Non-Housing Community Development	CDBG: \$ / HOPWA: \$ / Private: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		93	0	0.00%
Social, Economic & Community Development Services	Non-Housing Community Development	CDBG: \$ / HOPWA: \$ / Private: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	205000	29585	14.43%	76723	67940	88.55%
Social, Economic & Community Development Services	Non-Housing Community Development	CDBG: \$ / HOPWA: \$ / Private: \$	Homeless Person Overnight Shelter	Persons Assisted	0	0		0	0	
Social, Economic & Community Development Services	Non-Housing Community Development	CDBG: \$ / HOPWA: \$ / Private: \$	Businesses assisted	Businesses Assisted	0	27		480	260	54.17%
Strengthen Homeownership Markets	Affordable Housing	CDBG: \$ / Private: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	233		0	233	
Strengthen Homeownership Markets	Affordable Housing	CDBG: \$ / Private: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	15000	0	0.00%	14785	5074	34.32%
Strengthen Homeownership Markets	Affordable Housing	CDBG: \$ / Private: \$	Direct Financial Assistance to Homebuyers	Households Assisted	1000	0	0.00%	100	92	92.00%

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

Based on the annual budget and the activities we know have been performed, the largest share of costs incurred in PY 2024 were strategic non-residential property change, both of the city and of subrecipients. These expenses include the payments on the Chick Web Recreation Center, Parkview Recreation Center, Poppleton Recreation Center, improvements to various public open spaces and parks, demotion of 6 structures, and codes enforcement of 12,776 properties across the low-moderate income areas of the city. The second largest share of funds covered expenses for providing affordable, safe housing. These expenses included housing rehab work such as replacement roofs, emergency repairs, aging-in-place modifications, rehab admin of homes to be sold or rented to low-mod income households, and incentive funds to cover closing and other costs of low -mod income homebuyers. The third largest expense category in PY 2023 was public services, including youth programs, employment training, and legal services, among others.

The large majority of the HOPWA funds went toward 656 units of tenant based rental assistance, which is slightly below the goal of 671 households assisted.

HOME Funds were used to complete and lease 155 new rental units. While this number is under the 247 projected, it should be understood that construction and leasing often are fraught with delays. The units projected are still in the pipeline.

ESG and CDBG funds were leveraged with CoC and other funds to provide shelter and services, including eviction prevention and rapid re-housing to 5,734 persons and their households.

While the need for affordable housing and better living conditions continues to grow, Baltimore is strategically using the federal Formula Funds and the associated leverage funds to create housing, economic, and community opportunities for all residents.

Section 108 Projects

In PY 2024 the City of Baltimore paid a total of \$2,000,000 against the \$12,240,000 Section 108 Loan for the demolition and redevelopment of the Chick Webb Recreation Center. Located at 1401 East Monument Street in the Dunbar-Broadway neighborhood, the total project costs are estimated to be Twenty-Million Seven-Hundred Sixty-Thousand Seven-Hundred Ninety-Six Dollars (\$20,760,796). The Section 108 Loan Funds is

leveraged by Eight-Million Four-Hundred Sixty-Thousand Seven-Hundred Ninety-Six Dollars (\$8,460,796) in non-federal sources.

Once completed, the new center will include an upgraded and accessible swimming pool and locker facilities, a new multipurpose/ gym/ event space and exercise studio, basketball courts, classrooms, and a recording studio honoring the Center's namesake. The Chick Webb Recreation Center is one component of the Perkins Somerset Oldtown Transformation Initiative that was awarded a Thirty-Million Dollar (\$30,000,000) Choice Neighborhoods Grant in 2018.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

Describe the clients assisted (including the racial and/or ethnicity of clients assisted with ESG)

	HESG
American Indian, Alaska Native, or Indigenous	0
Asian or Asian American	0
Black, African American, or African	0
Hispanic/Latina/e/o	0
Middle Eastern or North African	0
Native Hawaiian or Pacific Islander	0
White	0
Multiracial	0
Client doesn't know	0
Client prefers not to answer	0
Data not collected	0
Total	0

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

See Appendix for complete table of Race and Ethnicity, and Income.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	20,956,686	39,464,049
HOME	public - federal	6,477,130	7,500,000
HOPWA	public - federal	7,253,353	932,527
ESG	public - federal	1,865,532	1,449,095
Continuum of Care	public - federal	29,291,862	
General Fund	public - local	15,065,915	8,645,581
LIHTC	public - state	53,104,583	28,742,881
Other	private	142,398,872	76,355,660
Other	public - federal	142,398,872	76,355,660
Other	public - local	142,398,872	76,355,660
Other	public - state	142,398,872	76,355,660

Table 3 - Resources Made Available

Narrative

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
City Wide	65	60	
East Impact Investment Area	7	1	
Low Moderate Income Areas	25	35	
Park Heights Impact Investment Area	0	0	
Southwest Impact Investment Area	0	1	
West Impact Investment Area	3	3	

Table 4 – Identify the geographic distribution and location of investments

Narrative

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

HOME

The total costs from all sources of funding (HOME, other loans from federal, state and local sources, as well as private loans and grants) for the projects eligible for reporting during this period was \$82,577,015. HOME program funds in the amount of \$7,500,000 leveraged \$75,077,868,015 in other private & public funds including \$3,500,000 of HUD 202 funds and represents 9% of total project costs.

Baltimore City DHCD predicts as many as four (4) HOME projects will be completed and fully leased by the end of the next fiscal year. Construction is already completed on Perkins 2, Uplands 2A and Uplands 2B, but lease up and final draw will occur in FY 26. Construction on Perkins 3 will be completed during FY26. These projects will combine more than \$152.858.535 of funding with \$7,500,000 of HOME funds, about 5% of the \$160.358.535 total funds.

This year's completed HOME projects are all new construction projects. These projects include the 99 units of 420 Aisquith/Somerset 3 now formally known as The Ella. The Ella is the third completed project in Somerset phase of the Perkins Somerset Oldtown transformation. The other completed project is the 56 units of multifamily housing at Perkins Homes Phase 1. This is the first of 5 planned phases to redevelop the Perkins Somerset Oldtown developments. See more in the Appendix.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	17,180,623
2. Match contributed during current Federal fiscal year	1,500,000
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	18,680,623
4. Match liability for current Federal fiscal year	395,931
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	18,284,692

Table 5 – Fiscal Year Summary - HOME Match Report

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match
tbd	06/04/2025	1,500,000	0	0	0	0	0	1,500,000

Table 6 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at begin-ning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
4,518,993	1,577,479	689,803	0	5,406,669

Table 7 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Dollar Amount	0	0	0	0	0	0
Number	0	0	0	0	0	0
Sub-Contracts						
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0
	Total	Women Business Enterprises	Male			
Contracts						
Dollar Amount	0	0	0			
Number	0	0	0			
Sub-Contracts						
Number	0	0	0			
Dollar Amount	0	0	0			

Table 8 - Minority Business and Women Business Enterprises

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

Table 9 – Minority Owners of Rental Property

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
Parcels Acquired		0		0		
Businesses Displaced		0		0		
Nonprofit Organizations Displaced		0		0		
Households Temporarily Relocated, not Displaced		0		0		
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

Table 10 – Relocation and Real Property Acquisition

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	301	2,039
Number of Non-Homeless households to be provided affordable housing units	931	778
Number of Special-Needs households to be provided affordable housing units	617	1,265
Total	1,849	4,082

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	914	3,131
Number of households supported through The Production of New Units	313	168
Number of households supported through Rehab of Existing Units	613	691
Number of households supported through Acquisition of Existing Units	9	92
Total	1,849	4,082

Table 12 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

More rental assistance was able to be provided than was projected: HOPWA was able to assist more households than expected and CDBG funding that was projected for shelter costs was actually used for Rapid Rehousing and Eviction Prevention.

We finished and rented /sold fewer units than projected: these are primarily HOME units that are being leased up after the PY ended.

More units were acquired than projected: this is due to our oversight in the AAP of units that were acquired by new homebuyers.

Discuss how these outcomes will impact future annual action plans.

it is unlikely that this year's results will significantly impact future plans. Affordable housing continues to be difficult to find and finance for many Baltimore households. While HOME funds continue to dwindle, CDBG funds are not well structured to take advantage of the large leverage sources that HOME has, and the subrecipients of CDBG funds are less capable of making the leap to housing production on a large scale.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	2,158	104
Low-income	206	37
Moderate-income	167	14
Total	2,531	155

Table 13 – Number of Households Served

Narrative Information

The table that breaks out renter vs homeowners by income level is in the Appendix.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The Baltimore City Continuum of Care (CoC) continues to make significant progress with efforts to engage people experiencing homelessness, especially unsheltered persons. During this reporting period the CoC maintained three homeless outreach teams that are staffed by the Mayor's Office of Homeless Services and two nonprofit service providers: Downtown Partnership of Baltimore and People Encouraging People (PEP). These three teams coordinate to ensure consistent coverage throughout Baltimore City, leading multiple citywide innovations that directly contributed to Baltimore's emergency response and encampment coordination strategies, all while maintaining direct, compassionate contact with over 800 individuals experiencing homelessness.

Outreach teams continued to implement the expanded Encampment Resolution Protocol—a framework that integrates trauma-informed service delivery with enhanced interagency coordination and clear enforcement timelines. This modernization enables the City to respond more swiftly and effectively to encampment concerns, balancing the need for public safety with compassion for vulnerable residents. By aligning service providers, law enforcement, and community partners, the protocol ensures that outreach and resolution efforts were consistent, transparent, and respectful.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City used ESG funds to support the following programs:

Shelters and Services

Provide one or more of the following: shelter, convalescent care, health checks and care, showers, laundry, meals, case management, income, mental health, substance abuse, housing location services, and referrals to other essential services.

Providers include Associated Catholic Charities, Weinberg Housing and Resource Center (ACC WHRC) (677 served); Health Care for the Homeless (HCH) (118 served); Project PLASE, Inc. (PPL), Temporary Housing for Vulnerable Adults (57 served); St. Vincent de Paul of Baltimore (SVDP), Sarah's Hope Shelter (279 served); TIME Organization, Men's Shelter (468 served); TIME Organization, Women's Shelter (486 served)

Day Centers

Provide one or more of the following: meals, case management, health checks and care, showers,

laundry, life skills training, mental health support, transportation assistance, housing location services, and referrals to other essential services.

Providers included Family and Children's Services of Central Maryland, Inc. T/A Springboard Community Services, Youth Resource Drop-In Center (210 served); St. Vincent de Paul of Baltimore (SVDP), Bean's and Bread Drop-in Center (267 served)

Street Outreach

Provide one or more of the following: basic needs (i.e. food, clothing), housing referrals, transportation to shelter and essential services, and connections to community resources.

Providers included Paul's Place (45 served); Downtown Partnership of Baltimore (197 served)

Rapid Rehousing and Eviction Prevention

Provide one or more of the following: medium-term rental assistance, short-term rental assistance, comprehensive case management, transportation assistance, and assistance to address barriers to housing.

Providers included St. Vincent de Paul of Baltimore (SVDP), Front Door Rapid Rehousing Program (19 households served); United Way of Central Maryland (45 households served)

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

To support housing opportunities for individuals and families exiting homelessness, the Mayor's Office of Homeless Services (MOHS) administers the House Baltimore Initiative—a collaborative effort among property owners and managers, community stakeholders, and homeless service providers in Baltimore City. Through this initiative, housing partners become House Baltimore members and receive a range of

benefits for renting to households experiencing or at risk of homelessness. In addition to financial incentives, the program provides access to wraparound services and ongoing housing stability support from local homeless service agencies, helping to ensure long-term success for tenants and landlords alike.

MOHS's Coordinated Access team works closely with providers to ensure that people have the resources and support needed to transition into permanent housing. In calendar year 2024, 1,044 clients exited homelessness to permanent housing. Additionally, as of PY 2024, 95% of clients had a successful housing placement to a permanent housing destination, including people who stayed in permanent housing projects longer than 6 months.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

HABC's annual report of their FY 2024 is in process and when available will be posted at <https://www.habc.org/habc-information/plans-reports-policies/plans-reports-policies/>

Actions taken to encourage public housing residents to become more involved in management and participate in homeownership

HABC's annual report of their FY 2024 is in process and when available will be posted at <https://www.habc.org/habc-information/plans-reports-policies/plans-reports-policies/>

Actions taken to provide assistance to troubled PHAs

HABC is not a troubled PHA

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

As noted in the Consolidated Plan, Baltimore City does not support public policies that limit the creation of housing for low-income households. Although Baltimore has less than a quarter of the region's population, Baltimore has over three-quarters of the region's subsidized housing as well as the largest reservoir of market rate housing affordable to households with incomes of less than 80% of AMI.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

As was noted in the 2021 – 2025 Consolidated Plan, the City has a large number of households in need of housing assistance and the City addresses the needs of some of these households through available Annual Plan resources.

As Table 1 in module CR-5 – Goals and Outcome at the beginning of this document shows, these actions were successfully carried out in PY 2024. DHCD and MOHS are collaborating using HOME ARP and ARPA funding to develop Permanent Supportive and Affordable Housing units for people experiencing homelessness, with 177 PSH and 156 affordable housing units projected. Additionally, five new emerging Development Teams completed the Supportive Housing Institute of which 4 received early-predevelopment funding.

CDBG funds were used to provide rehab and repair services to 691 LMI homeowners; provide down payment assistance to 92 first-time homebuyers; provide housing counseling to 5,074 LMI homeowners and buyers; add 13 new homes to the affordable housing inventory; and provide 379 households with subsistence funds to prevent eviction. CDBG funds supported 214 households in Permanent Supportive Housing. Additionally, ESG and CDBG funds provided rapid rehousing, homelessness prevention or other outreach services to 1569 homeless individuals and HOPWA funding provided tenant based rental support, Permanent Supportive Housing, Rapid Rehousing or Eviction Prevention services to 656 households.

HOME funds were used to construct and lease 155 new units of subsidised rental housing. Home funds also facilitated inspection 601 units of existing subsidised housing to preserved their status as affordable housing.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

Lead-based hazards continue to be a focus for Baltimore City. In PY 2024 156 LMI households with young children or pregnant women received lead abatement and education services. Eight (8) eligible

households were relocated to certified lead safe housing. lead hazard abatement compliance assistance was provided to two hundred three (203) property owners with vulnerable tenants.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

Baltimore Community Action Partnership (CAP) administers services and delivery systems that promote self-sufficiency and provide opportunities for low-income households. This program operates five geographically dispersed Community Action Partnership Centers located in the Govans, Park Heights, Cherry Hill, Highlandtown, and Oliver neighborhoods. in PY 2023 the CAP center provided self-sufficiency programs and referrals to other anti-poverty opportunities to 33,495 low-and-moderate income persons and their households.

The CDBG program funded 15 non-profits who provided job and employment readiness training and employment to a total of 1,753 low- and moderate-income persons. Living Classroom Foundation's Workforce Development Center provided workforce development services to 562 public LMI persons, and direct employment to an additional 88 persons through their Project Serve program that performs cleaning and boarding services for the Baltimore Codes Enforcement Division; Maryland New Directions assisted 272 low- and moderate-income individuals with employment preparation, career counseling, life skills training, computer literacy training, job placement and follow up employment services; Casa de Maryland provided job training to 105 LMI ESL learners.

The Caroline Center provided job training/education to 166 low-income women to enable them obtain jobs through a 15-week tuition-free program that includes soft skills training and occupational skills training in geriatric nursing and as a pharmacy technician. Banner Neighborhoods provided job readiness and skills training to 140 LMI teenage learners. Grow Home provided skills training and summer employment to 71 LMI youth and adults doing park and open space rehabilitation and repair work. Parks and People trained and employed 65 LMI teenage learners doing similar work in parks and open spaces. St Francis Neighborhood Center provided 10 LMI youth with paid interships

Bon Secours and Civic Works provided training and employment in green jobs to 10 and 6 job seekers, respectively.

Druid Heights CDC assisted 45 ex-offenders and Intersection of Change - Strength to Love served 8 ex-offenders with integrating back into society through job training and employment opportunities. PIVOT provided job skills training and placement services to 175 women reentering from incarceration.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

Capacity building activities were undertaken by the Central Baltimore Partnership using CDBG funds. The Community Law Center and The Community Mediation Center served subrecipients and other non-profits through legal and mediation services, respectively. The Neighborhood Design Center and Baltimore Green Space both provided planning services to neighborhoods and non-profits to enable

them to create and promote thriving, healthy neighborhoods and community amenities.

Belair-Edison Neighborhoods, Greater Baybrook Alliance, and Latino EDC all used CDBG funds to provide capacity building services to neighborhood businesses and emerging entrepreneurs to ensure that Baltimore's commercial districts thrive and provide needed services and goods to surrounding neighborhoods.

DHCD, MOHS, and several of the subrecipient organizations continue to develop capacity by providing career training and support to new and existing staff members. DHCD continues to re-organize the division to streamline the workflow, eliminate redundancies, and improve customer service.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

Government agencies, for-profit and nonprofit organizations all work to coordinate services for individuals in public and private housing.

The Mayor's Office of Homeless Services (MOHS) is the City's Continuum of Care lead applicant. During this CAPER period, MOHS continued its participation and coordination with public, housing, and social service agencies. For example, MOHS has partnered with the Department of Social Services (DSS) to bring DSS on-site to several emergency shelter locations to help shelter residents apply for benefits. As a result, DSS held over 970 appointments and submitted 311 applications between September 2024 through June 2025. Additionally, MOHS partners closely with the Housing Authority of Baltimore City to match over 1,400 housing vouchers to people experiencing homelessness.

MOHS administers Housing Opportunities for Persons with AIDS (HOPWA) for the Baltimore Eligible Statistical Metropolitan Area. Low-income persons living with HIV/AIDS and people experiencing homelessness receive priority for eligibility purposes.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

See the Attachments for a complete report on Baltimore's efforts to address impediments to fair housing choice in PY 2024.

CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

CDBG

DHCD, through its Consolidated Planning Office, provides a comprehensive review of subrecipient and local government agency performance related to the use of CDBG funds. The primary objective is to ensure compliance with applicable Federal, state, and local laws, regulations, policies, and procedures and to safeguard against improper use of Federal funds. Program and Financial Compliance Officers are responsible for conducting the necessary monitoring of subrecipients and City agencies awarded CDBG funding. The primary purpose of the monitoring process is to ensure that all subrecipients are maintaining appropriate documentation to support the applicable CDBG national objective(s) and eligibility category(s) outlined in their agreement.

Toward this end, monitoring procedures are designed to focus on contract compliance, compliance with local and federal regulations, soundness of internal controls, eligibility of program costs, program income and allied matters. Once the monitoring is completed, an exit interview is conducted with the agency staff to advise them of the outcome of the monitoring. A written report is e-mailed to the agency detailing the outcome of the monitoring and requesting the agency to address findings if any.

HOME

DHCD provides, through its Office of Project Finance, a comprehensive review of the HOME projects that have benefited from receiving HOME funds. The primary objective of this review is to ensure compliance with applicable federal laws, regulations, policies, and procedures and to safeguard against improper use of federal funds. Monitoring policies and procedures have been developed that address compliance with regulatory obligations, eligibility of HOME funded activities and internal management controls. The goals of monitoring are to identify deficiencies and provide corrective measures to improve reinforce or augment program performance in the management and administration of HOME funds.

ESG and HOPWA

In accordance with the requirements of funding, MOHS conducts ongoing compliance monitoring to ensure that both MOHS and its subrecipients are responsible stewards of public funds. This monitoring helps confirm that valuable services are being delivered to individuals experiencing homelessness, with the goals of securing housing, supporting long-term housing stability, and preventing eviction. The compliance monitoring framework is evidence-based and designed to be implemented on a continuous basis system-wide.

The compliance team conducts an onboarding meeting at the beginning of the fiscal year for both new and continuing programs to ensure that subrecipients understand funding requirements and reporting needs. Compliance monitoring starts with thorough planning to ensure that each subrecipient has a thorough understanding of the contract and project deliverables. Subrecipients submit monthly expenditure reports, which includes a review of all documentation for expenses incurred. Program Compliance and Fiscal Accountants schedule joint meetings at least quarterly, mid-year, and annually. This monitoring includes both on-site reviews and off-site (or remote) evaluations of records, reports, and audits.

Risk Assessments guide the planning and determine the type of monitoring required. When monitoring uncovers deficient performance, these are documented as Findings or Concerns. Each Finding necessitates the creation and execution of a Corrective Action Plan aimed at reinforcing, improving, correcting, or supplementing the subrecipient's performance.

Additionally, MOHS provides Technical Assistance as needed to support subrecipients in meeting compliance requirements.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

Pending completion of Public Comment Period.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

This CAPER covers the fifth year of the 2020-2024 Consolidated Plan's five years. This Consolidated Plan includes greater geographic specificity as to where activities will be undertaken, building off DHCD's A New Era of Neighborhood Investment: A Framework for Community Development. Such an approach more readily allows public resources to be concentrated, thus creating conditions likely to engender private market investment or, where such conditions are already in place, buttress private investment. While DHCD has long supported a build-from-strength approach, the 2020-2025 Consolidated Plan more explicitly identifies strategies and implementing actions that make such an approach manifest. The 2026-2030 Consolidated plan builds on this approach by identifying areas adjacent to where improvements have been made in 2020-2025 that are ripe for redevelopment in 2026-2030. The emphasis going forward will increasingly be a "whole block" approach to catalyze additional leverages as DHCD makes improvements.

This CAPER also covers the fifth year of this City administration. Accordingly, mayoral priorities have been instituted, which are generally in accordance with the Framework for Community Development. These priorities, known as Mayoral Pillars, are:

- Building Public Safety
- Prioritizing Our Youth
- Equitable Neighborhood Development
- Clean & Healthy Communities
- Responsible Stewardship of City Resources

Overall, the 2024 program year has been one of building staff capacity and streamlining processes to do more with less and do it consistently.

A major addition to Baltimore's program objectives going forward stems from the City and the State working together to address the blight caused by vacant properties in Baltimore. This work will continue into the coming Consolidated Plan years as more funds are devoted to demolition of delapidated buildings, stabilization of salvagable structures, legal and tax pressure on owners of vacant properties to sell or put the property back into productive use, and rehabilitation of abandoned homes for resale or leasing. While we have awarded federal entitlement funds to these types of projects in the past, with the State and private investors' leverage, we expect that more CDBG and other DHCD funds will go to these efforts.

Several Amendments to various Annual Action Plans were also approved in PY 2024. These Amendments generally were to spend funds that were expiring or to facilitate our "Spendedown Plan". In particular,

Amendments awarded funds to the Baltimore City Recreation and Parks Department to support several park and recreation center improvements or developments in low-moderate income areas. These projects are tied to the Mayor's Pillars to Prioritize Youth and Build Public Safety. Payment of the Chick Webb 108 will continue in coming program years, but additional park development is not expected to utilize CDBG as significantly. Amendments were also made to provide additional funds for Homeownership Assistance. Future Action Plans are expected to continue to place strong emphasis on homebuyer support.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

CR-50 - HOME 24 CFR 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Please list those projects that should have been inspected on-site this program year based upon the schedule in 24 CFR §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

During the City's fiscal year (July 1, 2024 – June 30, 2025), forty-eight (48) file inspections were conducted. 583 separate files were inspected. There were ten (10) properties with at least one file out of compliance with record keeping requirements. Neither rent or income eligibility were at issue in any case. All but one property passed their reinspection, the final property is pending reinspection. All of the properties cited had minor record keeping errors or overdue recertifications. Baltimore City conducts inspections based on the calendar year not the fiscal year, twenty-four (24) active HOME projects will have been inspected after the fiscal year. Approximately 320 individual files will be inspected during that time. Five (5) properties are not scheduled for inspection this year

During the City's fiscal year (July 1, 2024 – June 30, 2025), 54 physical inspections were conducted. In total, 601 units were inspected. Of the 54 properties, twelve (12) were cited for non-compliance.

Issues of the twelve properties found in non-compliance had at least one unit flagged issues including water damage to walls and ceilings, missing light fixtures, pest infestation, inoperable garbage disposals, loosed water closets and unfinished repair work, low maintenance to property grounds and building common areas. Physical inspections are conducted in accordance with 92.504(d), HUD's determination of frequency of schedule. According to its size, properties are inspected annually, every two years and every three years. Properties that are scheduled every two and three years, which were inspected in the fiscal year, did not require inspection for this reporting year.

[Due to character limitations imposed by eCon Suite program, detailed inspection lists categorizing physical and file inspections by inspection time period do not fit in the space available. These lists are found in the Appendix.]

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 24 CFR 91.520(e) and 24 CFR 92.351(a)

During the reporting period HOME staff continued to implement the regulations set forth at 24 CFR 92.351 by referencing the affirmative marketing provisions in all documents and security instruments signed by borrowers. The loan document holds the Borrower legally accountable and establishes compliance, which is a condition of receiving HOME funds. Non-compliance triggers default under the terms of the HOME loan. Borrowers participating in a HUD multifamily housing program administered by

the Office of Project Finance (OPF) are required to carry out a marketing program to attract prospective tenants of all minority and non-minority groups within the housing market area regardless of race, color, religion, sex, disability, familial status or national origin. During the onsite compliance monitoring, the compliance staff reviews evidence of compliance with the written agreement.

While implementing Baltimore City's HOME Program, several methods are utilized to ensure that all HOME recipients are aware of and comply with Affirmative Marketing Provisions of the Fair Housing Act. Baltimore City's Affirmative Marketing Policy is further described in the Department's Letter of Intent, Commitment Letter, and security instruments for all projects receiving HOME funds.

All Community Housing Development Organizations (CHDO's) and for-profit property managers of HOME-assisted rental projects are required to display the federal FHEO and drug-free workplace signs in areas visible to the public. In addition to any general marketing activities, each rental housing development must carry out an affirmative marketing program. The affirmative marketing efforts are to include but not be limited to groups that, because of the development's location or other factors, are considered 'least likely' to apply for housing at the development. The affirmative marketing program must also include outreach efforts to all persons with disabilities. In addition, those developments with accessible or adaptable apartments are to include, in their affirmative marketing program, specific outreach efforts to persons with physical disabilities.

Baltimore City continues to monitor affirmative marketing efforts through the annual certification of the project's tenant demographic information and continues to provide training for both for-profit and non-profit developers. Regulatory information is mailed annually to assist owners and property managers in their compliance efforts.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

The HOME Program began the fiscal year with \$4,518,993 in program income and collected \$1,577,479 during the fiscal year. During the fiscal year, \$689,803 was drawn to pay for construction costs associated with 525 Asquith/Somerset 2 and Uplands Phase 2A. Uplands 2A is still under construction and will provide 56 units of affordable housing. Somerset 2 completed construction during the fiscal year and has provided 99 units of affordable housing. Sixty-seven (67) of the 67 units were leased to tenants at 30% of AMI and 100% of tenants identified as African American. Many of the residents at 525 Aisquith (aka The Ruby) are returning public housing residents from Perkins Homes.

Describe other actions taken to foster and maintain affordable housing. 24 CFR 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 24 CFR 91.320(j)

Construction is complete of NHP Park Heights Senior. NHP Park Heights Senior includes 92 units at 60% of the Area Median Income ("AMI") and 8 units at 30% AMI adjusted for family size to meet the

programmatic requirements of the Affordable Housing Trust Fund. The unit mix includes one- and two-bedroom units. The total development costs are approximately \$53,512,303.

During the fiscal year, the first two HOME-ARP awardees completed underwriting.

Beacon House Square will leverage \$1,000,000 and HOME-ARP loan (the “HOME-ARP Loan,” and together with the City AHTF Loan in the approximate amount of \$1,800,000 to assist in the rehabilitation of 56 affordable rental units located at the property known as 3549 Old Frederick Road for low- and very low-income residents. The Development is a joint venture between Project PLASE, Inc. (“Project PLASE”), a 501(c)(3) non-profit organization, and Beacon Communities Corp. (“Beacon Communities”), with the support of Unity Properties, Inc. (“Unity”), a 501(c)(3) non-profit organization. Project PLASE is a not-for-profit real estate organization active in Baltimore that is dedicated to preserving and creating sustainable, service-enriched multifamily housing that is both affordable to very-low and low income families and beneficial to their communities. Beacon Communities is a full-service residential development company that specializes in all aspects of multi-family housing. Unity Properties, Inc. is a subsidiary of Bon Secours Mercy Health, Inc. The Development is expected to include 12 units at 30% or below AMI, 17 units at 50% or below AMI, and 27 units at 60% or below AMI. The unit mix includes studios and one-bedroom units.

A HOME-ARP Loan in the amount of \$1,250,000 was made to Clare Court II, Limited Partnership to finance a portion of hard construction costs for the development of 5 permanent supportive housing units for the qualifying populations of those at-risk of homelessness. Homes For America – Clare Court II project will utilize Baltimore City’s three sources for referrals for their transitional to permanent housing program. Those 3 sources to fill units will be through the City’s existing Coordinated Access System (CAS), the project-based waiting list of the Housing Authority of Baltimore City (HABC) and HFA’s waiting list managed by the owner/property manager of the projects. Clare Court II will include 13 units at 30% AMI or below, 9 units at 40% AMI or below, 8 units at 50% AMI or below, and 53 units at 60% AMI or below. As set forth below, the unit mix includes: one-bedroom units, two-bedroom units, three-bedroom units, and four-bedroom units.

CR-55 - HOPWA 91.520(e)

Identify the number of individuals assisted and the types of assistance provided

Table for report on the one-year goals for the number of households provided housing through the use of HOPWA activities for: short-term rent, mortgage, and utility assistance payments to prevent homelessness of the individual or family; tenant-based rental assistance; and units provided in housing facilities developed, leased, or operated with HOPWA funds.

Number of Households Served Through:	One-year Goal	Actual
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	20	80
Tenant-based rental assistance	600	671
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	10	0
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	4	0

Table 14 – HOPWA Number of Households Served

Narrative

MOHS continues to fund University of MD's HIV Clinic under with HOPWA Funded Support Services and Short-Term Rent, Mortgage and Utility assistance. Thus, MOHS continued to fund short term rent, mortgage and utility assistance under HOPWA through the University of Maryland's Institute of Virology, Baltimore County and Carroll County. Eighty (80) HOPWA eligible households were assisted in maintaining housing stability and placement in their homes through short-term rental, mortgage, and utility assistance funds.

Rental assistance:

A total of 605 rental subsidies were planned for persons living with HIV/AIDS across the Baltimore EMSA for PY 2024. The EMSA exceeded this goal, serving a total of six hundred seventy-one (671) households. Some jurisdictions in the Baltimore EMSA were able to eliminate their waiting lists and offer permanent housing assistance to HOPWA eligible households. Five counties in the EMSA have directed most of their funds to provide clients with tenant-based rental subsidies. In most counties, TBRA is administered through the housing agencies, with support services being provided by the local health departments. This remains consistent with the goals of increasing availability of affordable housing opportunities and housing for the disabled.

Facility-based housing:

There are currently no facility-based housing funded with HOPWA funds.

CR-58 – Section 3

Identify the number of individuals assisted and the types of assistance provided

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
Total Number of Activities	0	1	0	0	0
Total Labor Hours		150,008			
Total Section 3 Worker Hours		40,237			
Total Targeted Section 3 Worker Hours		7,625			

Table 15 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG	HOME	ESG	HOPWA	HTF
Outreach efforts to generate job applicants who are Public Housing Targeted Workers					
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.	15				
Direct, on-the job training (including apprenticeships).	5				
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.					
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).	10				
Outreach efforts to identify and secure bids from Section 3 business concerns.					
Technical assistance to help Section 3 business concerns understand and bid on contracts.					
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.					
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.	10				
Held one or more job fairs.					
Provided or connected residents with supportive services that can provide direct services or referrals.					
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.					
Assisted residents with finding child care.					
Assisted residents to apply for, or attend community college or a four year educational institution.	2				
Assisted residents to apply for, or attend vocational/technical training.	2				
Assisted residents to obtain financial literacy training and/or coaching.					
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.					
Provided or connected residents with training on computer use or online technologies.	9				
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.					
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.					

Other.					
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Table 16 – Qualitative Efforts - Number of Activities by Program

Narrative

DHCD estimates that at least 55 Baltimore City residents were employed at some point during the HOME projects that completed construction in FY 25. One of the projects completed was not required to report Section 3 received. Outreach efforts included job fairs for public housing residents and job posting with Employ Baltimore. Contractors at these projects also registered with the Mayor’s Office of Employment Development’s Employ Baltimore Program. The Mayor’s Office of Employment Development also posts job openings at their Career Centers and their website. In other efforts, McCormack Barron Salazar, the developer of Perkins Square has continues its engagement with a supportive housing organization to help former Perkins Homes residents find employment.

A total of 15 NPOs were awarded CDBG funds to provide job training, search assistance, or internships. 1,753 LMI residents were provided with services. Three agencies focus on serving teenagers. One agency focuses on medical job skills, and another has specific tracts for those wanting to work in the shipping ports. Place or type of residence is not something we track, but most of the agencies are near to one or more public housing developments.

CR-60 - ESG 91.520(g) (ESG Recipients only)

ESG Supplement to the CAPER in *e-snaps*

For Paperwork Reduction Act

1. Recipient Information—All Recipients Complete

Basic Grant Information

Recipient Name	BALTIMORE
Organizational DUNS Number	140231759
UEI	
EIN/TIN Number	526000769
Identify the Field Office	BALTIMORE
Identify CoC(s) in which the recipient or subrecipient(s) will provide ESG assistance	Baltimore City CoC

ESG Contact Name

Prefix	Ms
First Name	Michelle
Middle Name	
Last Name	Owens Goode
Suffix	
Title	Program Compliance Manager MOHS

ESG Contact Address

Street Address 1	7 E. Redwood Street - 5th Floor
Street Address 2	
City	Baltimore
State	MD
ZIP Code	21202-
Phone Number	4103962209
Extension	
Fax Number	
Email Address	michelle.owens-goode@baltimorecity.gov

ESG Secondary Contact

Prefix	Mrs
First Name	Ernestina
Last Name	Simmons
Suffix	
Title	Executive Director
Phone Number	4103962209
Extension	
Email Address	Ernestina.Simmons@baltimorecity.gov

2. Reporting Period—All Recipients Complete

Program Year Start Date	07/01/2024
Program Year End Date	06/30/2025

3a. Subrecipient Form – Complete one form for each subrecipient

Subrecipient or Contractor Name
City
State
Zip Code
DUNS Number
UEI
Is subrecipient a victim services provider
Subrecipient Organization Type
ESG Subgrant or Contract Award Amount

CR-65 - Persons Assisted

4. Persons Served

4a. Complete for Homelessness Prevention Activities

Number of Persons in Households	Total
Adults	
Children	
Don't Know/Refused/Other	
Missing Information	
Total	

Table 17 – Household Information for Homeless Prevention Activities

4b. Complete for Rapid Re-Housing Activities

Number of Persons in Households	Total
Adults	
Children	
Don't Know/Refused/Other	
Missing Information	
Total	

Table 18 – Household Information for Rapid Re-Housing Activities

4c. Complete for Shelter

Number of Persons in Households	Total
Adults	
Children	
Don't Know/Refused/Other	
Missing Information	
Total	

Table 19 – Shelter Information

4d. Street Outreach

Number of Persons in Households	Total
Adults	
Children	
Don't Know/Refused/Other	
Missing Information	
Total	

Table 20 – Household Information for Street Outreach

4e. Totals for all Persons Served with ESG

Number of Persons in Households	Total
Adults	
Children	
Don't Know/Refused/Other	
Missing Information	
Total	

Table 21 – Household Information for Persons Served with ESG

5. Gender—Complete for All Activities

	Total
Male	
Female	
Transgender	
Don't Know/Refused/Other	
Missing Information	
Total	

Table 22 – Gender Information

6. Age—Complete for All Activities

	Total
Under 18	
18-24	
25 and over	
Don't Know/Refused/Other	
Missing Information	
Total	

Table 23 – Age Information

7. Special Populations Served—Complete for All Activities

Number of Persons in Households

Subpopulation	Total	Total Persons Served – Prevention	Total Persons Served – RRH	Total Persons Served in Emergency Shelters
Veterans				
Victims of Domestic Violence				
Elderly				
HIV/AIDS				
Chronically Homeless				
Persons with Disabilities:				
Severely Mentally Ill				
Chronic Substance Abuse				
Other Disability				
Total (unduplicated if possible)				

Table 24 – Special Population Served

CR-70 – ESG 91.520(g) - Assistance Provided and Outcomes

8. Shelter Utilization

Number of New Units – Rehabbed	
Number of New Units – Conversion	
Total Number of bed - nighths available	
Total Number of bed - nights provided	
Capacity Utilization	

Table 25 – Shelter Capacity

9. Project Outcomes Data measured under the performance standards developed in consultation with the CoC(s)

CR-75 – Expenditures

11. Expenditures

11a. ESG Expenditures for Homelessness Prevention

	Dollar Amount of Expenditures in Program Year		
	2022	2023	2024
Expenditures for Rental Assistance			
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance			
Expenditures for Housing Relocation & Stabilization Services - Services			
Expenditures for Homeless Prevention under Emergency Shelter Grants Program			
Subtotal Homelessness Prevention			

Table 26 – ESG Expenditures for Homelessness Prevention

11b. ESG Expenditures for Rapid Re-Housing

	Dollar Amount of Expenditures in Program Year		
	2022	2023	2024
Expenditures for Rental Assistance			
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance			
Expenditures for Housing Relocation & Stabilization Services - Services			
Expenditures for Homeless Assistance under Emergency Shelter Grants Program			
Subtotal Rapid Re-Housing			

Table 27 – ESG Expenditures for Rapid Re-Housing

11c. ESG Expenditures for Emergency Shelter

	Dollar Amount of Expenditures in Program Year		
	2022	2023	2024
Essential Services			
Operations			
Renovation			
Major Rehab			
Conversion			
Subtotal			

Table 28 – ESG Expenditures for Emergency Shelter

11d. Other Grant Expenditures

	Dollar Amount of Expenditures in Program Year		
	2022	2023	2024
Street Outreach			
HMIS			
Administration			

Table 29 - Other Grant Expenditures

11e. Total ESG Grant Funds

Total ESG Funds Expended	2022	2023	2024

Table 30 - Total ESG Funds Expended

11f. Match Source

	2022	2023	2024
Other Non-ESG HUD Funds			
Other Federal Funds			
State Government			
Local Government			
Private Funds			
Other			
Fees			
Program Income			
Total Match Amount			

Table 31 - Other Funds Expended on Eligible ESG Activities

11g. Total

Total Amount of Funds Expended on ESG Activities	2022	2023	2024

Table 32 - Total Amount of Funds Expended on ESG Activities

APPENDICES

- Fair Housing AI update
- Map of all Expenditures

FAIR HOUSING GROUP FY 2021-2025 AI IMPLEMENTATION PLAN

8/11/2025

FY 2026 Highlights

- Baltimore Regional Fair Housing Group members, working with consultant Root Policy Research, the Baltimore Neighborhood Indicators Alliance, Baltimore Regional Housing Partnership, and many private stakeholders, completed a new Regional Fair Housing Plan in May 2025, including evaluation of 2020 action steps and new regional and local government action steps for 2025-2030.
 - Stakeholder involvement included:
 - July 17, 2024 virtual meeting attended by 59 people.
 - October 1 hybrid meeting attended by 64 people, including 36 in person at the Harriet Tubman Cultural Center in Columbia.
 - February 18, 2025 virtual Public Hearing attended by 34 people.
 - Public comment period for full month of February 2025. Comments responded to and some edits made to draft Plan.
 - Action steps emerged from stakeholder working groups in the following topics:
 - Increase and preserve quality rental housing options, including in high opportunity areas.
 - Address racial homeownership disparities.
 - Expand fair housing resources and compliance (enforcement)
- The Regional Project-Based Voucher (PBV) Program achieved a key milestone to sustain mobility counseling for PBV families and also leased up additional units in FY 2025:
 - The Maryland Dept. of Housing and Community Development (DHCD) approved a way to fund mobility counseling of PBV apartment families moving forward – a capital reserve fund using a portion of the developer’s fee or other new source of funding to the development. This will fund mobility counseling for PBV awards made from here on.
 - The PBV Program also secured \$52,000 from The Abell Foundation through the Baltimore Regional Housing Partnership to provide mobility counseling to families from the Housing Authority of Baltimore City (HABC) waiting list who will occupy PBV units already awarded.
 - Based on those two achievements, the Regional PBV Program issued an RFP in May 2025, its first since 2023, requiring the new reserve fund to cover the cost of mobility counseling for PBV unit families.
 - The Program also leased up the 8 PBV apartments at Brock Bridge Landing in Jessup and additional apartments at Orchard Meadows in Ellicott City, bringing the total PBV units leased to 62.
- BMC and Fair Housing Group members continued to integrate local governments’ fair housing and transportation planning by:

- Presenting the results of an FY24 study of regional opinions related to housing and transportation at:
 - The October 1, 2024 hybrid stakeholder meeting cited above,
 - The October 1 Baltimore Regional Transportation Board (BRTB) Technical Committee, and
 - A May 6 Fair Housing Group meeting with State Housing Secretary Jake Day.
- Participating in an FY25 BRTB Scenario Planning effort that modeled potential transportation consequences of various factors, including transit investments, travel demand management measures, and adding 90,000 new homes above current projections by the year 2050.
 - The new VisionEval modeling tool is now available to BMC and local governments to model additional options.
 - This exploratory work is in preparation for the region’s next long-range transportation plan in 2027.
- BMC has continued to produce a report of regional accomplishments for inclusion in jurisdiction Consolidated Annual Performance and Evaluation Reports (CAPERs).

Contact with questions:

Dan Pontious, Housing Policy Coordinator
 Baltimore Metropolitan Council
dpontious@baltometro.org
 410-732-0500 x1055

Legend

Text
Text

Regional Action Steps from 2020 Regional AI Implementation Measures & Expected Outcomes [Text Wrapping Break]
 ✓ = Completed action/outcome

Action Plan Steps and (shaded) Implementation Measures & Expected Outcomes	FY	FY	FY	FY	FY
	2021	2022	2023	2024	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.	✓	✓	✓	✓	

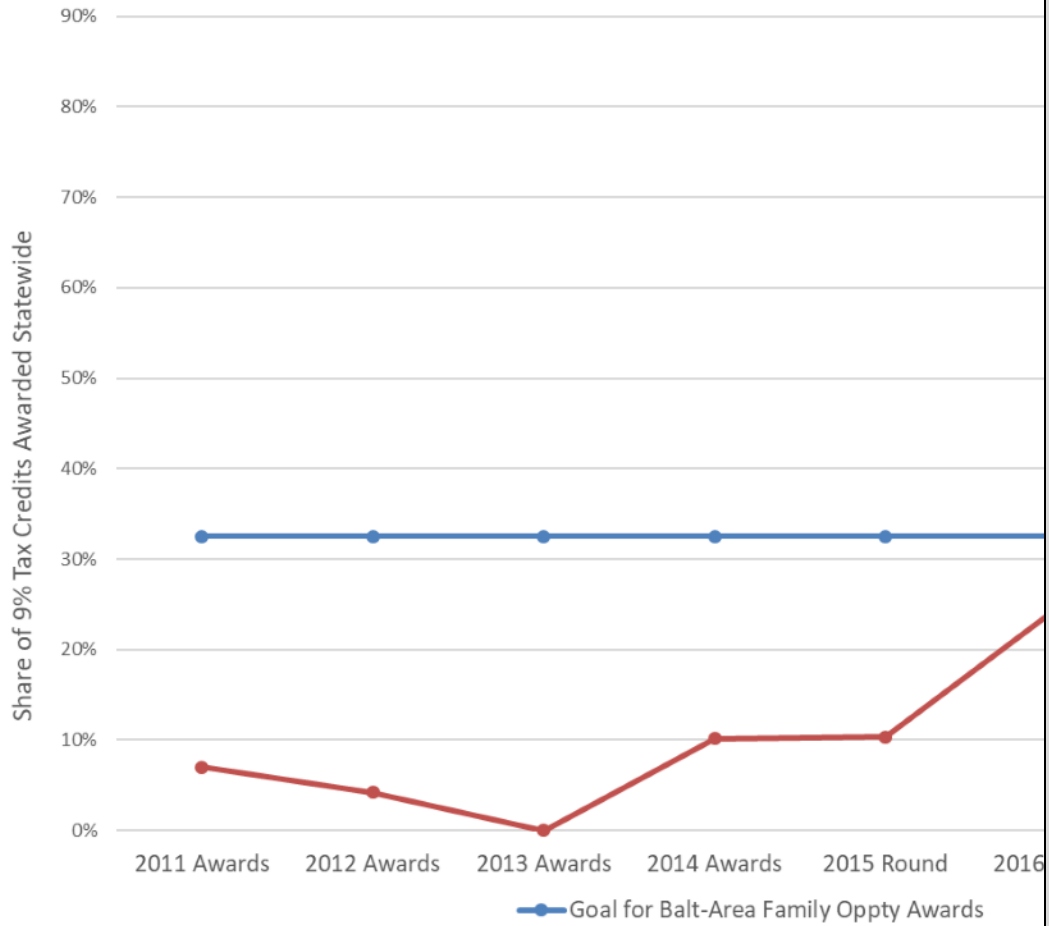
In addition to ongoing coordination, BMC produces progress report each summer that local governments incorporate into their CAPERs.	✓.	✓.	✓.	✓.	✓.
Fair Housing Group reviewed draft HUD rule on affirmatively furthering fair housing and is now fully engaged in updating 2020 Regional AI. Jurisdictions and 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. Two additional large meetings held, attended by 59 and 64 people, with the last meeting held hybrid in-person and online. Virtual public hearing held February 18, attended by 34 people, with comment period through February 28. Final analysis completed in May 2025.				✓.	✓.
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.	✓.	✓.			
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 trainings for 26 property owners/managers. The Equal Rights Center conducted 33 paired tests in Anne Arundel and Harford Counties in FY24.				✓.	
From March 1 to Sept. 30, 2024, the Equal Rights Center conducted 62 tests in Baltimore County – 55 rental tests, four lending tests, and three sales tests. 22 of those tests looked for discrimination based on source of income, 22 were based on disability, four on national origin, four on gender, and three on race.				✓.	✓.
In FY25, the Equal Rights Center conducted one training for Harford County Housing Analysts and attended a Renters Rights event sponsored by the Harford County Human Relations Commission.					✓.
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.			✓.	✓.	

Outcome: 2025 fair housing analysis calls for expanded training of property owners and managers, robust paired testing around the region, and tracking enforcement outcomes to establish an effective deterrent to 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.		✓.			
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.				✓.	
FY25 meetings with stakeholders focused on developing the 2025 Fair Housing Plan, with two large meetings described above on July 17 and October 1, 2024, and then a public hearing on February 18, 2025. Development of Plan also included twelve smaller meetings focused on Fair Housing Enforcement in the Private Market, Housing Supply and Siting of Affordable Housing, and Impediments to Fair Housing for Renters					✓.

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.		✓			
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.			✓		
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.					
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.				✓	
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.					
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.					
In FY25, the Program focused on identifying funding for mobility counseling for PBV unit tenants. \$52,000 has been secured from The Abell Foundation to counsel HABC families, and partners are exploring other interim funding sources. Maryland DHCD has agreed to allow developers to capitalize a reserve with part of their developer fee or other new					✓

<p>funding as a long-term solution, and in June 2025 the Regional PBV Program issued its first RFP since 2023.</p>					
<p>Outcome: 150 vouchers committed (goal of 140) and 62 units occupied (goal of 70) by June 30, 2025.</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. 					
<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>			✓.		

Maryland 9% LIHTC Awards



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.

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.

✓

2020 Regional AI 9% LIHTC Prorated Goals-to-Actual																		
<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>~1150</td> <td>~1180</td> </tr> <tr> <td>Family COO Units</td> <td>~650</td> <td>~780</td> </tr> <tr> <td>Revitalization Units</td> <td>~500</td> <td>~420</td> </tr> </tbody> </table>		Category	2020-2023 Actual	Prorated 2025 Goal	Units Awarded	~1150	~1180	Family COO Units	~650	~780	Revitalization Units	~500	~420					
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<p>Because Maryland DHCD's next 9% round came in early 2025, with a May 2025 deadline for applications, DHCD did not award additional 9% LIHTC in fiscal year 2025.</p> <p>Outcomes: 9% LIHTC awards FY 2021-2025 include 1,157 units awarded in Baltimore region, 49% of statewide awards (goal of 50%), including 650 family units in areas of opportunity, or 56% of Baltimore-area awards (goal of 65%) and 800 units contributing to concerted community revitalization plans, or 44% of Baltimore-area awards (goal of 35%).</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>Outcome: We did not receive an award.</p>		✓.																
<p>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.</p>																		
<p>Distribution of portability education booklet and showing of video at voucher briefings ongoing.</p>		✓.	✓.	✓.	✓.	✓.												
<p>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</p>		✓.																
<p>Expected outcome: Porting survey results analyzed and no additional action needed at this time.</p>		✓.																

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.					
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.	✓.	✓.			
<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.			✓.		
There was not enough time while developing the 2025 Fair Housing Plan to implement a new BMC web page, including homeownership success stories, special purpose credit programs, local and State down payment assistance programs, and home repair assistance programs (for homeownership preservation). 2025 plan includes action step to ensure this type of information is easily accessible from BMC and local government websites. Steps below were not done.					✓.
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.					
Outcome: This specific work deferred to 2025 Regional Fair Housing 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					
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.	✓.				
Several Housing and Planning Directors and private stakeholders participated in BMC’s scenario planning effort in spring 2025, exploring futures out to 2050 with different transportation investments and housing production in preparation for 2027 Baltimore Regional Long Range Transportation Plan.					✓.
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.					
No opportunity presented itself for BMC to connect Fair Housing Group and Housing Committee to efforts within MTA and/or Baltimore Regional Transportation Board to explore these efforts, as well as any other efforts, such as South Baltimore Gateway Partnership. Other demand-response efforts in region?					
Outcome: No real exploration of these efforts; need update on demand-response efforts.					
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.				✓.	
FY2024 PIA request yielded 2022 data, but that was only one year after 2021 data, and there was not enough time for analysis for 2025 Fair Housing Plan. 2021 data included in Plan’s analysis.					✓.
Outcome: No change in data availability.					

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, carried out focus groups exploring public attitudes toward housing growth, affordable housing, and transportation, including transit-oriented development.				✓	
Focus group results presented in two October 1, 2024 meetings: Technical Committee of Baltimore Regional Transportation Board and 2025 Fair Housing Plan Stakeholder Group. Also presented in May 6, 2025 meeting with Maryland Housing Secretary Jake Day and his leadership team.					✓
Outcome: Results of FY24 focus groups available for 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, including projected geographic scope of current Adequate Public Facilities Ordinance-related restrictions.				✓	✓
Outcome: Semi-annual meetings of Planning and Housing Directors envisioned in order to explore approaches to restrictions on housing development like these.					✓
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.					
Outcome: Shared information, but no action so far.					✓
<i>Expand fair housing resources and compliance</i>					
20. Continue to engage with Maryland DHCD to make www.MdHousingSearch.org an effective: a. Clearinghouse of publicly assisted and market-rate rental homes, including homes accessible to persons with disabilities,					

b. Affirmative fair housing marketing tool for homes assisted through Maryland DHCD and other agencies, and c. Viable tool for public housing authorities to refer their housing choice voucher holders, including those with disabilities.					
Reiterated request to Maryland DHCD that Md. Housing Search automatically populate accessibility features based on Fair Housing Act requirements. Response still pending.	✓.	✓.			
Outcome: Automatic population not yet 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.					
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: <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.		✓.	✓.	✓.	
Outcome: Md. Housing Search appears to be a more 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. PHAs will continue to use our template of the DHCD-required MOU to facilitate affirmative marketing to voucher holders.					✓.
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.					
Outcome: Almost 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.			✓.		
Reviewed HUD’s proposed new regulations. All PHAs are already conducting individual assessments and most do not look back further than three years. HUD 2024 proposed regulations never finalized.				✓.	
Outcome: Criminal background standard supported by research in place for PHAs.					✓.
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.				✓.	
In FY25, the Equal Rights Center conducted one training for Harford County Housing Analysts and attended a Renters Rights event sponsored by the Harford County Human Relations Commission.					✓.
Outcome: 2025 Regional Fair Housing Action Plan pledges expanded fair housing training for property owners and managers, including PHA partners and recipients of local government affordable housing support.					✓.
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.	✓.				
Outcome: Through 2025 Fair Housing Plan, BMC will continue to analyze Maryland DHCD’s LIHTC occupancy data to gauge success of affirmative marketing and conduct					✓.

any needed affirmative marketing training (Regional Step #17). PHAs will continue to use modified template of DHCD-required MOU with LIHTC developers to facilitate affirmative marketing to voucher holders (Regional Step #18).					
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.					
Outcome: 2025 Fair Housing Plan Regional Steps 19-21 include fair housing education for housing choice voucher holders, homebuyers through housing counseling programs, and property owners and managers. The Fair Housing Group will address needs for materials as part of those steps.					✓

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