

Baltimore County 2025 Analysis of Impediments to Fair Housing Choice, Fair Housing Action Plan DRAFT

	BALTIMORE COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
Goal 1	Establish over-arching fair housing policy to establish a foundation for affirmatively furthering fair housing.	All impediments: Limited land dedicated to attainable residential housing development; need for ongoing funding and commitment to increase housing supply to accommodate need for attainable and workforce housing; Potential for increased concentration of protected classes in low opportunity areas without expanded multifamily development envelope; Limited information for residents on fair housing rights and housing opportunities, need for expanded fair housing outreach and education; and Neighborhood resistance to accommodating a diversity of housing choices		
Task 1	Ensure that there is a statement of policy in Master Plan 2030 and the Zoning Regulations that clearly articulates the County's commitment to expanding fair housing choice.	<ul style="list-style-type: none"> •Lack of inclusive land use and zoning policies •Lack of access to opportunities for underserved communities 	Baltimore County Housing and Community Development (DHCD); and the Department of Planning	Since the election of the new County Executive, the Source of Income legislation, known as the "Home Act", was successfully passed in November 2019. Policy updates to Master Plan 2020 and the Zoning Regulations were taken under advisement for further review. Provisions from the County's 2019 "Home Act" were included as an update to Master Plan 2020. Appropriate language was added to the County's Master Plan 2030 - Goal 5, Action 2: <i>"Implement the County's Fair Housing Action Plan in alignment with the BMC's regional policies on housing ."</i>
Task 2	Incorporate AFFH principles, including provisions to expand the locations available to multi-family housing, into any future substantial revisions to the zoning map.	<ul style="list-style-type: none"> • Land use and zoning laws • Community opposition 	Department of Planning	The County is exploring development of potential strategies as solutions to this task. The current year 2020 is the time for review of the County's Comprehensive Zoning Map Process (CZMP). Baltimore County is actively strategizing to enhance equitable housing opportunities by prioritizing the development of diverse, attainable, and multi-family housing options within areas of growth and opportunity. Guided by Master Plan 2030, the County seeks to align land use policies and zoning practices with principles of equity and inclusivity, removing barriers to housing access while fostering mixed-use, mixed-income communities. This strategy emphasizes leveraging public-private partnerships, advancing transit-oriented development, and integrating housing near essential services, job centers, and amenities to support sustainable and inclusive growth.
Task 3	Adopt an inclusionary housing ordinance that can be incorporated into the County's development codes.	<ul style="list-style-type: none"> • Occupancy codes and restrictions • Community opposition • Lack of state or local fair housing laws 	Department of Housing and Community Development (DHCD)	Baltimore County's Master Plan 2030 supports addressing the impediments of occupancy codes, community opposition, and the lack of state or local fair housing laws by emphasizing housing diversity, equity, and affordability (Chapter 3, Housing, pages 50-53). It does not explicitly propose an inclusionary housing ordinance for incorporation into the county code. However, in December 2024, the County Executive issued an Executive Order establishing a framework for an inclusionary housing policy applicable to development projects requesting use of public funds.
Task 4	Revise policy priorities for the investment of HOME and CDBG funds to promote projects invoking rental housing for families on sites outside of racially/ethnically concentrated areas.	<ul style="list-style-type: none"> • Community opposition • Lack of access to opportunity due to high housing costs • Location and type of attainable housing • Location of accessible housing • Availability of attainable units in a range of sizes 	Department of Housing and Community Development (DHCD)	The County continues to use HOME and CDBG funds to increase access to homeownership, and maintain while increasing housing for low-to-moderate income households. Policies were revised to accommodate this priority.

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Task 5	Track data showing the number of attainable housing created by household type (senior, family, large family, accessible) and by areas of opportunity and areas of racial and ethnic concentrations. To the extent possible, monitor occupancy of assisted units by protected class.	<ul style="list-style-type: none"> Lack of access to opportunity due to high housing costs 	Department of Housing and Community Development (DHCD)	Since 2016 the County has diligently tracked data of attainable housing developments financed by VCA funds and reported the occupancy data of these units to the Complainants and HUD FHEO on a monthly basis. DHCD has improved its tracking of attainable housing data through tools like the Rental Occupancy Demographic Report Web Portal, the Opportunity Moves Report and additional mapping efforts. Demographic and accessibility data collection is ongoing to ensure alignment with mobility goals and VCA requirements. While foundational processes are established, continued efforts to engage rental property owners and tenants will address remaining data gaps and support sustained compliance.
Task 6	Prioritize for participation in the Mobility Counseling Program, HCV applicants and participants who are families residing in census tracts that have been identified as areas of African-American racial concentration in the County's 2011 Analysis of Impediments and the 2019 Regional Assessment of Fair	<ul style="list-style-type: none"> Lack of access to opportunity due to high housing costs Availability of attainable units in a range of sizes 	Office of Housing	The Office of Housing implemented the Mobility program in 2016 to assist families with relocation to areas of opportunity. The Mobility program is open to all voucher participants as a voluntart support. A preference or priority is not required as the program is open to all. Families residing in census tracts that have been identified as areas of African-American racial concentration are a targeted group for program marketing.
Task 7	Reduce barriers to development or financial assistance for workforce and attainable housing developers	<ul style="list-style-type: none"> Community opposition Lack of access to opportunity due to high housing costs Location and type of attainable housing Location of accessible housing Availability of attainable units in a range of sizes 	Department of Planning	The County meets with developers on a consistent basis to critique development plans and explore creative development strategies. Developers are briefed on the development process and pertinent requirements such as affirmative marketing, workforce development, DHCD QAP, Law Department and other relevant issues. The County has created a Housing Opportunity Fund and adopted other tools such as expedited review and fee waiver applications to help incentivize attainable development and remove common barriers.
Goal 2	BALTIMORE COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
	Amend policy and program documents to affirmatively further fair housing.	Potential for increased concentration of protected classes in low opportunity areas without expanded multifamily development envelope and Limited information for residents on fair housing rights and housing opportunities; need for expanded fair housing outreach and education		
Task 1	Revise the County's HOME policies to remove potential impediments to the creation of rental units in non-concentrated areas, particularly the requirement that developers acquire assistance.	<ul style="list-style-type: none"> Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs. 	Department of Housing and Community Development (DHCD)	In the 2016 publication, "A Guidebook for Developers Requesting Development Financing and Assistance", the County's HOME policies revision removed the requirement "that developers require assistance". Any reference requiring County Council support to initiate the development or funding processes for attainable rental housing was deleted.
Task 2	Revise a written policy that encompasses the Site and Neighborhood Selection requirements at 24 CFR 983.6 (Project-Based HUD VASH vouchers), incorporate these requirements into the County's HOME written agreements, distribute as part of application package.	<ul style="list-style-type: none"> Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs. 	Department of Housing and Community Development (DHCD)	The Department of Planning revised its loan agreements to incorporate the Site and Neighborhood Selection requirements at 24 CFR 983.6 accordingly and incorporated these requirements into the County's HOME written agreements and distributed as part of the developers application package.

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Task 3	Amend the affirmative marketing standards so that the County is responsible to devise the standards by which the effectiveness of affirmative marketing efforts for each project will be judged.	<ul style="list-style-type: none"> • Lack of local public fair housing enforcement • Lack of state or local fair housing laws 	Department of Housing and Community Development (DHCD)	In accordance with the regulations of the Department of Housing and Urban Development (HUD), and in furtherance of Baltimore County's commitment to non-discrimination and equal opportunity in housing, the Department of Planning has developed a standard for the development of attainable housing in its 2017 Affirmative Fair Housing Marketing Plan. Also, certain Baltimore County-funded development projects are required to submit a Conciliation Agreement Marketing Plan (CAMP) that must be reviewed and approved by HUD FHEO. After which 30 days of affirmative marketing must take place prior to leasing.
Task 4	Ensure that the HOME written agreements for developers encompass federal site and selection requirements	<ul style="list-style-type: none"> • Lack of local public fair housing enforcement 	Department of Planning	Federal and state requirements are included in HOME written agreements with developers.
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Goal 3	Increase access to County programs for persons with limited English proficiency.	Limited information for residents on fair housing rights and housing opportunities; need for expanded fair housing outreach and education		
Task 1	Complete four-factor analysis of needs and language access plan according to HUD's LEP guidance.	<ul style="list-style-type: none"> • Lack of meaningful language access 	Office of Housing	The Office of Housing publishes its language access plan annually. The Department of Planning published the 2015 Language Access (LAP) Plan. Both agencies continue to take reasonable steps to ensure meaningful access to LEP persons per HUD guidance.
Task 2	Update the Section 8 Administrative Plan to include the policy determinations resulting from the four-factor analysis.	<ul style="list-style-type: none"> • Lack of meaningful language access 	Office of Housing	The Office of Housing's Administrative Plan includes policy determination derived from the four-factor analysis.
Task 3	Continue to provide language services (interpreters, translators, etc.) on an as-needed basis.	<ul style="list-style-type: none"> • Lack of meaningful language access 	Office of Housing	Both the Office of Housing and the Department continue subscriptions to Language Line services taking reasonable steps to ensure meaningful access to LEP persons per HUD guidance.
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Goal 4	Ensure that members of the protected classes are represented on housing-related boards and commissions.	Limited information for residents on fair housing rights and housing opportunities, need for expanded fair housing outreach and education; and Neighborhood resistance to accommodating a diversity of housing choices		

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Task 1	Survey current board members on a voluntary basis to document race, gender, ethnicity and disability status.	<ul style="list-style-type: none"> •Lack of diversity data •Lack of representation •Lack of accessibility •Lack of transparent recruitment 	<ul style="list-style-type: none"> •Department of Social Services (DSS) Board •Office of Diversity, Equity, and Inclusion (DEI) Human Relations Commission 	<ul style="list-style-type: none"> •The Department of Social Services Board is currently comprised of members of protected classes and continues to affirmatively recruit members of the protected classes. •The Human Relations Commission actively supports diversity on housing-related boards and commissions by ensuring representation from protected classes and engaging in targeted outreach and recruitment efforts to promote inclusive participation.
Task 2	Affirmatively recruit protected class members to fill vacancies on appointed boards and commissions.	<ul style="list-style-type: none"> •Lack of leadership diversity •Lack of community trust •Lack of equitable policy advocacy 	<ul style="list-style-type: none"> •Office of Diversity, Equity, and Inclusion (DEI) Human Relations Commission 	The Commission on Disabilities and Human Relations Committee continue to affirmatively recruit members of protected classes. In November of 2019 the newly elected County Executive in established the Diversity, Inclusion and Equity Community Advisory Council advocates for, engages in and responds to issues, concerns and needs of County residents as it relates to diversity, inclusion and equity. The Community Council's responsibilities include providing advisement to, and working collaboratively with, the Chief Diversity and Inclusion Officer on specific community diversity, inclusion and equity issues.
Task 3	Encourage the Greater Baltimore Board of Realtors (GBBR) to maintain data demonstrating the number of Realtors who are members of the protected classes to ensure that local Realtors reflect the County's diversity.	<ul style="list-style-type: none"> • Lack of diversity reflected within private Realtor community • Real estate sales discrimination • Lack of local private fair housing outreach and enforcement • Lack of resources for fair housing agencies and organizations 	<ul style="list-style-type: none"> •Office of Diversity, Equity, and Inclusion (DEI) Human Relations Commission 	The County has taken this recommendation under advisement and will explore development of potential strategies as solutions to this task.
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Goal 5	Increase the supply of housing attainable to households below 80% MHI, specifically in opportunity areas.	Potential for increased concentration of protected classes in low opportunity areas without expanded multifamily development envelope		
Task 1	Increase the Section 8 payment standard for higher-cost areas in the County as a means of expanding fair housing choice outside of racially/ethnically concentrated areas.	<ul style="list-style-type: none"> • Lack of access to opportunity due to high housing costs • Availability of attainable units in a range of sizes 	Office of Housing	The Office of Housing reviews payment standards annually to ensure Housing Choice in areas of opportunity.
Task 2	Expand incentives for property owners and investors to build new apartment buildings or substantially rehabilitate existing buildings for occupancy by lower-income families, specifically in areas of opportunity.	<ul style="list-style-type: none"> • Lack of access to opportunity due to high housing costs • Lack of private investments in specific neighborhoods • Lack of attainable, accessible housing in range of unit sizes • Location and type of attainable housing • Deteriorated and abandoned properties • Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs. • Regulatory barriers to providing housing and supportive services for persons with disabilities 	Department of Housing and Community Development (DHCD)	The County continues to work with developers/property owners and has been successful in creating new multifamily and scattered site properties throughout the County. The County recently passed legislation to eliminate impact fees for attainable housing projects.

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Goal 6	BALTIMORE COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
	Expand the availability of housing options for persons with disabilities	Potential for increased concentration of protected classes in low opportunity areas without expanded multifamily development envelope and Limited information for residents on fair housing rights and housing opportunities; need for expanded fair housing outreach and education		
Task 1	Devise means of more effectively publicizing the policy to increase the voucher payment standard for landlords who are willing to create accessible units.	<ul style="list-style-type: none"> • Access to publicly supported housing for persons with disabilities • Lack of attainable, accessible housing in range of unit sizes • Lack of assistance for housing accessibility modifications • Lack of assistance for transitioning from institutional settings to integrated housing • Location of accessible housing • Regulatory barriers to providing housing and supportive services for persons with disabilities. • State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing, shared housing, and other integrated settings. • Lack of local private fair housing outreach and enforcement 	Office of Housing	The Office of Housing will continue to incorporate voucher payment standards for landlords willing to create accessible units in its Annual, Five-Year and Administrative Plans.
Task 2	Partner with regional attainable housing developers to increase the supply of accessible housing [in moderate and high opportunity areas], outside of racially/ethnically concentrated areas.	<ul style="list-style-type: none"> • Lack of community revitalization strategies • Lack of local or regional cooperation • Lack of attainable, accessible housing in range of unit sizes • Lack of attainable, integrated housing for individuals who need supportive services • Location and type of attainable housing • Location of accessible housing • Quality of attainable housing information programs 	Department of Housing and Community Development (DHCD)	Since 2016 Baltimore County has worked with several attainable housing developers to assist with the creation of accessible housing units in areas of opportunity. Including Project Based Voucher opportunities to facilitate development of new units or substantial rehabilitation of scattered site units.

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Task 3	Maintain a current list of landlords with accessible units to offer a high level of assistance to persons with disabilities.	<ul style="list-style-type: none"> • Access to publicly supported housing for persons with disabilities • Lack of attainable in-home or community-based supportive services • Lack of attainable, accessible housing in range of unit sizes • Lack of attainable, integrated housing for individuals who need supportive services • Lack of assistance for housing accessibility modifications • Lack of assistance for transitioning from institutional settings to integrated housing • Location of accessible housing • Regulatory barriers to providing housing and supportive services for persons with disabilities. • State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing, shared housing, and other integrated settings. • Lack of local private fair housing outreach and enforcement 	Office of Housing	Office of Housing continues to recruit landlords that have accessible housing. Housing Search Specialist work directly with families to identify their specific housing needs.
Goal 7	BALTIMORE COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
	Improve the existing process for receiving, investigating and recording housing discrimination complaints	Limited information for residents on fair housing rights and housing opportunities; need for expanded fair housing outreach and education		
Task 1	Expand the protections of Article 29 to prohibit discrimination on the bases of familial status and sexual orientation in order to achieve consistency with Maryland's fair housing law.	<ul style="list-style-type: none"> • Lack of local private fair housing outreach and enforcement • Lack of local public fair housing enforcement • Lack of resources for fair housing agencies and organizations • Lack of state or local fair housing laws • Unresolved violations of fair housing or civil rights law 	Office of Housing/ Human Relations Committee/ County Executive	In 2012, Baltimore County Executive enacted legislation that added gender identity and sexual orientation to the county's existing anti-discrimination laws. In November 2019, the Source of Income legislation, known as the "Home Act", was successfully passed, expanding Article 29 of the Human Relations Code for Baltimore County.
Task 2	Continue to provide fair housing education and outreach efforts to landlords, building owners, rental agents and real estate agents.	<ul style="list-style-type: none"> • Lack of local private fair housing outreach and enforcement 	Department of Housing and Community Development (DHCD)	Since 2017 Baltimore County has, and continues to fund vendors that provide fair housing services in the form of outreach and training geared towards housing industry professionals.

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Task 3	Support fair housing testing, Language Access Planning, diversity in housing and planning boards, investigating housing discrimination, and collaborative efforts with local and national advocates.	<ul style="list-style-type: none"> • Private discrimination • Source of income discrimination • Lending discrimination • State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing, shared housing, and other integrated settings. • Admissions and occupancy policies and procedures, including preferences in publicly supported housing • Lack of Access to publicly supported housing for persons with disabilities • Lack of Access to transportation for persons with disabilities • Lack of local public fair housing enforcement • Lack of resources for fair housing agencies and organizations • Lack of state or local fair housing laws 	Department of Housing and Community Development (DHCD)	The Department of Planning published the 2015 Language Access (LAP) Plan. Beginning in 2016 Baltimore County has, and continues to fund Fair Housing Action Center of Maryland to provide fair housing services in the form of outreach, training geared towards housing industry professionals, complaints and referrals and testing. In alignment with the Baltimore County Enterprise Strategic Plan 2019 to 2022, the County plans to build a future centered on equitable decisions, providing opportunities and allocating resources and services through an equity, diversity, and inclusion lens that enhances growth and prosperity.
Goal 8	BALTIMORE COUNTY ACTION ITEMS	FAIR HOUSING ISSUES/ IMPEDIMENTS TO ADDRESS	RESPONSIBLE PARTY	METRICS AND MILESTONES
	Mitigate the extent to which mortgage loan denials and high-cost lending disproportionately affect minorities.	Potential for increased concentration of protected classes in low opportunity areas without expanded multifamily development envelope and Limited information for residents on fair housing rights and housing opportunities; need for expanded fair housing outreach and education		
Task 1	Continue to engage HUD-certified counselors to target credit repair education through advocacy organizations that work with minority populations.	<ul style="list-style-type: none"> • Quality of attainable housing information programs • Loss of attainable Housing • Displacement of residents due to economic pressures 	Department of Housing and Community Development (DHCD)	Credit repair education has been implemented in our ongoing contracts with HUD Certified Housing Counseling organizations contracted to provide housing counseling services.
Task 2	Continue to facilitate home ownership education and outreach with particular attention to members of the protected classes.	<ul style="list-style-type: none"> • Quality of attainable housing information programs 	Department of Housing and Community Development (DHCD)	The County continues to facilitate education and outreach to home owners, home buyers and renters utilizing accessible venues and providing accessible materials for members of protected classes. These efforts continue to be reported in the County's CAPER.
Task 3	Determine whether a local agency exists that has the capacity to provide mortgage lending testing on the basis of race.	<ul style="list-style-type: none"> • Lending discrimination • Lack of resources for fair housing agencies and organizations 	Department of Planning	Since 2016 Baltimore County has, and continues to fund qualified fair housing enforcement organizations as vendors that provide testing on the basis of protected classes in the areas of rentals, sales and mortgage lending; and additional fair housing services in the form of outreach, training, intake of complaints and referrals and tenant advocacy services.