2019 Baltimore Regional Analysis of Impediments to Fair Housing Choice (AI)

9/18/18

Six local jurisdictions and five public housing authorities (PHAs) in the Baltimore area, along with the Baltimore Metropolitan Council (BMC), are preparing a **Regional Analysis of Impediments to Fair Housing Choice (AI)** over the coming year. The AI process will include substantial opportunities for stakeholder and public involvement.

The Analysis of Impediments to Fair Housing Choice (AI)

The Fair Housing Act, first passed in 1968, prohibits discrimination based on race, color, religion, national origin, sex, disability, and family status. It also requires the U.S. Department of Housing and Urban Development (HUD), and thus any jurisdiction or PHA receiving funding from HUD, to administer their housing and urban development programs in a way that "affirmatively furthers" the policies of the law.

A 2015 rule from HUD, based on many court rulings under the Fair Housing Act, says, **"Affirmatively furthering fair housing means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics."**

Both the 2015 rule and HUD's 1995 guidance for conducting an AI require jurisdictions receiving federal funds to examine data on classes protected under the Fair Housing Act, identify barriers to housing choice for those protected classes, and set out an action plan for addressing those impediments.

The jurisdictions and PHAs in this metropolitan area are voluntarily cooperating and working with the Baltimore Metropolitan Council (BMC) to prepare one regional analysis. Local governments and PHAs will include relevant action steps from the 2019 AI in their plans for using federal funds beginning July 1, 2020.

Regional Stakeholder Work Group

In order to receive thoughtful and continuous input from stakeholders around the region during this process, the participants are assembling a Regional Stakeholder Work Group of about 40 members. **Cleveland Horton, Deputy Director of the Maryland Commission on Civil Rights, will chair the Work Group. Charles Martin, Administrative Vice President for M&T Bank, will serve as vice chair.** The following are the goals and process of the Work Group:

- **Goals:**
  - Help the jurisdictions, PHAs, BMC, and consultant review and interpret data provided by HUD for this assessment.
  - Help identify easily obtainable local data that would assist with this analysis.
  - Provide ongoing stakeholder input into:
    - Analysis of what this data means and its significance
    - Assessment of:
      - Past fair housing progress
      - Current fair housing enforcement and outreach capacity
    - Development of fair housing goals and priorities.

- **Stakeholder Work Group Meetings:** We have scheduled eight 90-minute meetings of this work group. All meetings will be held 3:00-4:30 pm at the BMC office at 1500 Whetstone Way, Suite 300, in the McHenry Row development in Locust Point section of Baltimore. (McHenry Row is located just off I-95, with free parking and public transit access.)
  - **Tuesday, October 23:** Overview & Initial Data -- Segregation and Racially/ Ethnically Concentrated Areas of Poverty (R/ECAPs)
  - **Thursday, November 8:** Disparities in Access to Opportunity -- Education, Low Poverty, and Public Health
  - **Thursday, December 13:** Disparities in Access to Opportunity -- Employment and Transportation
  - **Wednesday, January 9, 2019:** Disproportionate Housing Needs & Publicly Supported Housing
  - **Wednesday, January 30:** Disability and Access
  - **Wednesday, February 20:** Fair Housing Enforcement, Outreach Capacity, and Resources
  - **Thursday, March 14:** Developing Goals and Priorities. (We anticipate releasing a draft Regional AI in April)
  - **Wednesday, May 22:** Feedback on Draft Regional AI
- BMC will post all of these meetings on its web site and all meetings will be open to the public.

Other Opportunities for Public Input

- BMC's web site includes a link to HUD-provided data so that those who are interested can do their own analysis and offer it to the AI process.
- We will hold well-publicized public hearings around the region for broader public input in late 2018 and early 2019.
- Interested parties will also be able to comment via email and through BMC's web site and participating agencies' web sites. The participants will respond to all comments.
- Groups will be able to request presentations on the AI and opportunities for input.
- We anticipate a **final regional hearing on the draft Regional AI in June 2019**, and to have a **completed AI by October 2019**.

Regional AI Partners

The Baltimore Metropolitan Council, which has been assisting area jurisdictions and PHAs in affirmatively furthering fair housing since 2012, will also be assisting the following participants in carrying out this Regional AI:

- City of Annapolis and the Housing Authority of the City of Annapolis
- Anne Arundel County and the Housing Commission of Anne Arundel County
- City of Baltimore and the Housing Authority of Baltimore City
- Baltimore County
- Harford County and the Havre de Grace Housing Authority
- Howard County and the Howard County Housing Commission

For More Information

Please contact BMC Housing Policy Coordinator Dan Pontious at dpontious@baltometro.org or (410) 732-0500 x1055 with any questions.