



City of Hagerstown
ANALYSIS OF IMPEDIMENTS
TO FAIR HOUSING CHOICE

August 2025

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Department of Community & Economic Development

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Executive Summary

The City of Hagerstown, Maryland is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant Program (CDBG). In accordance with the Housing and Community Development Act of 1974, as amended, each entitlement community must "affirmatively further fair housing." In order to demonstrate that the entitlement community is "affirmatively furthering fair housing," it has the option to conduct an Analysis of Impediments to Fair Housing Choice which identifies any impediments to fair housing choice and strategies to affirmatively further fair housing. The Analysis of Impediments to Fair Housing should also address the Fair Housing Act, Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Section 109 of Title I of the Housing and Community Development Act of 1974, Title II of the Americans with Disabilities Act of 1990, the Architectural Barriers Act of 1968, the Age Discrimination Act of 1975 and Title IX of the Education Amendments Act of 1972.

The City of Hagerstown has prepared this update of its Analysis of Impediments to Fair Housing Choice (AI) to coincide with the City's FFY 2025-2029 Five-Year Consolidated Plan. As part of its Annual Action Plan, the City must sign certifications stating that the City will "affirmatively further fair housing". This means that the City will take appropriate actions to overcome the effects of any impediments identified through the AI and will maintain records reflecting what analysis and corrective actions were taken.

The City of Hagerstown previously prepared an Analysis of Impediments to Fair Housing Choice in 2020 and has prepared this new Analysis of Impediments to Fair Housing Choice for 2025-2029. The findings produced through this analysis will be further addressed in the City's FFY 2025-2029 Five-Year Consolidated Plan.

This analysis focuses on the status and interaction of six (6) fundamental conditions within the community:

- The sale or rental of dwellings (public or private);
- The provision of housing brokerage services;
- The provision of financial assistance for dwellings;
- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly assisted housing;

- The administrative policies concerning community development and housing activities, which affect opportunities of minority households to select housing inside or outside areas of minority concentration; and
- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by HUD regarding assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 570.

The methodology employed to undertake this Analysis of Impediments included:

Research:

- A review of the City's Zoning Ordinance, Comprehensive Plan, and land use policies and procedures was undertaken.
- A review of the Hagerstown Housing Authority's Annual Plans, the Public Housing Agency's Admission and Continued Occupancy Policy, the Housing Choice Voucher Administrative Plan, Family Self-Sufficiency Program Action Plan, and Section 504 Needs Assessment was undertaken.
- Demographic data for the City was analyzed from the U.S. Census, American Community Survey, and the HUD-CHAS data and tables.
- A review of financial lending institutions through the Home Mortgage Disclosure Act (HMDA) database was completed.
- A review of area real estate and mortgage practices was undertaken.
- A review of prior year plans was completed.

Interviews & Meetings

- Meetings and interviews were conducted with several City of Hagerstown departments, the Hagerstown Housing Authority, public safety departments, community advocacy groups and social services agencies, homeless service providers, neighborhood groups, economic development groups, education providers, housing providers, members of the Pen-Mar Association of Realtors, and faith-based organizations and groups.

Analysis of Data

- Low- and moderate-income areas were identified.
- Concentrations of minority populations were identified.

- Concentrations of rental and owner housing were identified.
- Awareness of fair housing in the community was evaluated.

Potential Impediments

- Public sector policies that may be viewed as impediments were analyzed.
- Private sector policies that may be viewed as impediments were analyzed.

The City of Hagerstown's 2025-2029 Analysis of Impediments to Fair Housing Choice has identified the following potential Impediments to Fair Housing Choice, along with goals and strategies to address those impediments to Affirmatively Further Fair Housing (AFFH) in the City:

Impediment 1: Fair Housing Education, Outreach, and Enforcement

Between 2020 and 2024 there were twenty-eight (28) Fair Housing Complaints filed with HUD in Hagerstown. Stakeholders have reported that many more go unreported. There is a need to educate persons about their Fair Housing rights and landlord responsibilities to raise awareness about Fair Housing.

Goal: The general public, City officials, lenders, landlords, and housing providers will become knowledgeable and aware of the Fair Housing Act and other housing laws and regulations. The City will strive to fulfill its responsibility to affirmatively further fair housing in the City of Hagerstown.

Strategies: In order to attain this goal, the following activities and strategies should be undertaken:

- **1-A:** Support and empower a Fair Housing Commission or Program to address fair housing complaints and promote fair housing in the City of Hagerstown.
- **1-B:** Help residents understand their rights under the Fair Housing Act, the Americans with Disabilities Act, and other applicable Federal, state, and local law and regulations through media, seminars, informational literature, and partnerships with fair housing organizations.
- **1-C:** Cooperate with the local Board of Realtors, Landlords' Association, and lenders to ensure landlords, sellers, lenders, and real estate agents are aware of and follow Fair Housing regulations.
- **1-D:** Continue the City's Rental Registry Program to identify substandard rental housing and discriminatory practices, help landlords address these issues, and enforce penalties when needed.

Impediment 2: Decent, Safe, Sound, Sanitary, Accessible and Affordable Housing Options

The average sale price of a home in the Hagerstown Area in December 2024 was \$320,000, which is out of reach for low- and moderate-income City residents. There were over 27,000 applicants on the Hagerstown Housing Authority's public housing and housing voucher waitlists in 2024. Additionally, 37% of homeowners with a mortgage and 52% of renters in Hagerstown spend over 30% of their total household income on housing. There is a need for additional housing options that are decent, safe, sound, sanitary, accessible and affordable for both homebuyers and renters.

Goal: The supply of affordable for-sale and for-rent housing options that is decent, safe, sound, sanitary, and accessible will meet the needs of all households in the City of Hagerstown, through new construction, rehabilitation, and infill of dedicated housing and mixed-use structures.

Strategies: In order to attain this goal, the following activities and strategies should be undertaken:

- **2-A:** Continue to work with private, public, and nonprofit entities to renovate and construct new high-quality housing throughout the City, with a focus on affordability and homeownership.
- **2-B:** Continue to promote the City's Homeownership Program and Down Payment Assistance Program to increase the proportion of owner-occupied housing in order to advance wealth building, reduce the household cost burden, and encourage reinvestment and a sense of community pride.
- **2-C:** Continue to promote and finance the City's Home Rehabilitation Programs to conduct emergency repairs, install utility connections, and make improvements toward meeting City and national building codes for safety, energy efficiency and accessibility.
- **2-D:** Provide incentives to landlords to maintain rental properties to meet City and universal building codes for safety, energy efficiency and accessibility through construction and rehabilitation of rental housing, code enforcement activity, and continued use of the City's Rental Registry Program.
- **2-E:** Provide support to seniors and persons with disabilities in making accessibility improvements to their homes so they can continue to live independently.
- **2-F:** Continue to work with the Hagerstown Housing Authority to provide residents with high-quality accessible public housing options and housing choice vouchers.
- **2-G:** Continue to work with the City's Code Administration Department to identify suitable properties for rehabilitation, renovation, or demolition and new construction.

Impediment 3: Homelessness

The City of Hagerstown’s unhoused population has increased due to factors such as substance addiction, health, abuse, and financial losses. Beyond the impacts on persons who are unhoused or who are at risk of homelessness, this is a community issue that affects housing and community development.

Goal: In coordination with social service organizations, government agencies, and concerned citizens, the City will assist in providing services to prevent homelessness, assist in providing services to those experiencing homelessness, and assist in transitioning unhoused persons into decent, safe, sound, and sanitary housing according to the “Housing First” model.

Strategies: In order to attain this goal, the following activities and strategies should be undertaken:

- **3-A:** Support the efforts of nonprofits, public safety departments, and government agencies in providing “No Wrong Door” services to unhoused and at-risk persons, including food and personal necessities, emergency shelter, financial and legal support, and physical and mental healthcare.
- **3-B:** Support efforts to create a day shelter for homeless individuals to obtain food, services, healthcare, and job training for employment.
- **3-C:** Support efforts to improve care and housing for individuals and families who are victims of domestic violence, abuse, stalking, trafficking and similar activities.
- **3-D:** Assist households through aid organizations with rent and mortgage assistance, security deposits, application fees, utility assistance, and legal aid to forestall homelessness and transition unhoused persons and households out of homelessness.
- **3-E:** Continue to assist in developing housing for placement of unhoused persons according to the “Housing First” model, which will allow them to seek employment and financial stability.

Impediment 4: Economic Improvement and Investment

The December 2024 unemployment rate in the City was 3.6%, but only 62.2% of residents age 16 or older participated in the labor force. The others are excluded by factors such as disability, age, or the need to provide childcare. Only 20% of workers have at least a bachelor's degree, which limits the majority's access to high-skill, high-paying jobs and limits employer efforts to attract local residents to high-paying positions in the City.

Goal: The City will expand and diversify its tax base by attracting new businesses and expanding existing industries, and will support job training and education efforts which will reduce unemployment, increase wages, and support residents in reentering and succeeding in the labor force.

Strategies: In order to attain this goal, the following activities and strategies should be undertaken:

- **4-A:** Support organizations and agencies that educate and train low- and moderate-income persons and other disadvantaged groups such as seniors and persons with disabilities, persons in substance abuse recovery programs, persons exiting incarceration, or unhoused persons.
- **4-B:** Support organizations and agencies that provide services such as childcare, equipment, and transportation which will allow persons to enter or reenter the workforce.
- **4-C:** Support organizations and agencies that are developing and expanding commerce and industry in the City of Hagerstown, in order to increase the tax base and employ more residents.
- **4-D:** Coordinate job placement efforts with public and private employers, with an emphasis on higher-paid career positions accessible to those without higher education.
- **4-E:** Continue existing initiatives such as the Façade Improvement Program and consider new initiatives to encourage investment by local entrepreneurs in disadvantaged areas of the City.

Impediment 5: Social Services

The City of Hagerstown has a reputation for high-quality social services, but they may not be easily accessible or meet the public's needs. There is a need to identify, improve, complement, and provide a central clearinghouse for social and human services.

Goal: Residents of the City of Hagerstown will be able to easily access equitable and effective social and human services through a “No Wrong Door” collaboration of nonprofits, healthcare providers, food access organizations, government agencies and other interested parties.

Strategies: In order to attain this goal, the following activities and strategies should be undertaken:

- **5-A:** Coordinate and support the efforts of nonprofits, non-governmental organizations, public safety departments, and government agencies in providing “No Wrong Door” services to persons in need, including food and necessities, emergency shelter, financial and legal support, and physical and mental healthcare.
- **5-B:** Identify and eliminate any gaps in human services, particularly in previously identified areas such as food access, transportation, mental health treatment, and childcare.
- **5-C:** Complement services provided by different nonprofit and government agencies to ensure that all gaps are filled, eliminate unnecessary duplication of services, and facilitate a seamless handoff between services and agencies.
- **5-D:** Conduct outreach and improve services for at-risk groups such as seniors, persons with disabilities, youth, persons with limited English proficiency, and victims of domestic violence or trafficking.

Impediment 6: Public Facilities, Infrastructure, and Services

Public facilities, infrastructure, roads, sidewalks, trails, and park facilities in the City of Hagerstown are not completely ADA accessible or sufficiently maintained. Many citizens wish to see the City improve its community outreach with a focus on public safety and creating safe and clean neighborhoods.

Goal: The City will continue to make physical and operational improvements to public facilities, thoroughfares, and lands, will address litter and blight, and will create safe and attractive neighborhoods.

Strategies: In order to attain this goal, the following activities and strategies should be undertaken:

- **6-A:** Continue to provide and improve parks and recreational facilities, programming, arts and entertainment, literacy, and community events to increase visitation and pride in the City.
- **6-B:** Invest in public infrastructure in low- and moderate-income areas including roads, sidewalks, trails, sanitary and storm sewers, utilities, and parks to improve safety and usability.
- **6-C:** Improve public safety by investing in emergency services, community policing, and code enforcement to reduce blighting influences.
- **6-D:** Improve community pride by investing in neighborhood cleanup and other programs to reduce blighting influences.
- **6-E:** Address transportation needs in and around the City through public transit and paratransit improvements, partnerships with transportation providers, and improvements to pedestrian, bicycle, and automotive infrastructure.

I. Introduction

The City of Hagerstown is a CDBG Entitlement Community under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant Program and a HOME Entitlement Community under HUD's HOME Investment Partnership Program. In accordance with the Housing and Community Development Act of 1974, as amended, each entitlement community must "affirmatively further fair housing." As part of its commitment to "affirmatively furthering fair housing," the City of Hagerstown has prepared an Analysis of Impediments to Fair Housing Choice which identifies any real or potential impediments to fair housing choice.

"Fair housing choice" is defined as:

"The ability of persons, regardless of race, color, religion, sex, national origin, familial status, or handicap, of similar income levels to have available to them the same housing choices."

The Fair Housing Analysis consists of the following six (6) conditions:

- The sale or rental of dwellings (public or private);
- The provision of housing brokerage services;
- The provision of financial assistance for dwellings;
- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly assisted housing;
- The administrative policies concerning community development and housing activities, which affect opportunities of minority households to select housing inside or outside areas of minority concentration; and
- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by HUD regarding assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 570.

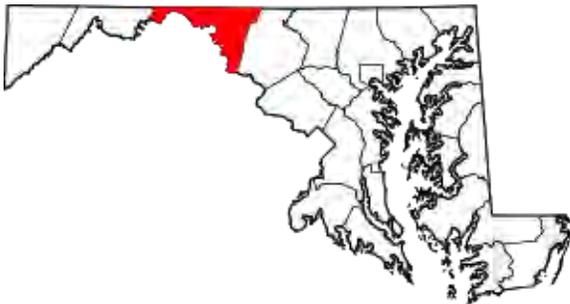
The City of Hagerstown has now prepared this 2025 Analysis of Impediments to Fair Housing Choice to coincide with the City's FFY (Federal Fiscal Year) 2025-2029 Five-Year Consolidated Plan and FFY 2025 Annual Action Plan.

II. Background Data



Photo credit: DRB Homes, drbhomes.com

In order to perform an analysis of fair housing in the City of Hagerstown, the demographic and socioeconomic characteristics of the City were evaluated as a basis for determining and identifying if there are any existing impediments to fair housing choice.



The City of Hagerstown was founded in 1739 when German immigrant Jonathan Hager purchased 200 acres of land in the Great Appalachian Valley and called it “Hager’s Fancy”. In 1762 Hager founded the town of Elizabethtown (named after his wife), and by 1776 he had convinced

the State to designate his town as the county seat of newly-created Washington County. In 1813 the City Council changed the city’s name to Hagerstown due to its popular usage and the Maryland State Legislature officially endorsed the name the following year.

Hagerstown is situated at the crossroads of the historic Great Indian Warpath, a major corridor through the eastern foothills of the Appalachian Mountains now known as US

Highway 11, and the National Pike (now US Highway 40), the first wagon road between the East Coast and the Ohio River. Hagerstown developed quickly as a transportation hub due to its proximity to these trade routes and the Potomac River. Through the 1800s the early roads were followed first by the Chesapeake & Ohio Canal in nearby Williamsport, then by branches of the Norfolk and Western, Baltimore and Ohio, Pennsylvania, and Western Maryland Railroads which all met and interchanged in Hagerstown. This infrastructure made Hagerstown a repeated target during the US Civil War; the city was occupied and looted three times by the Confederate army.

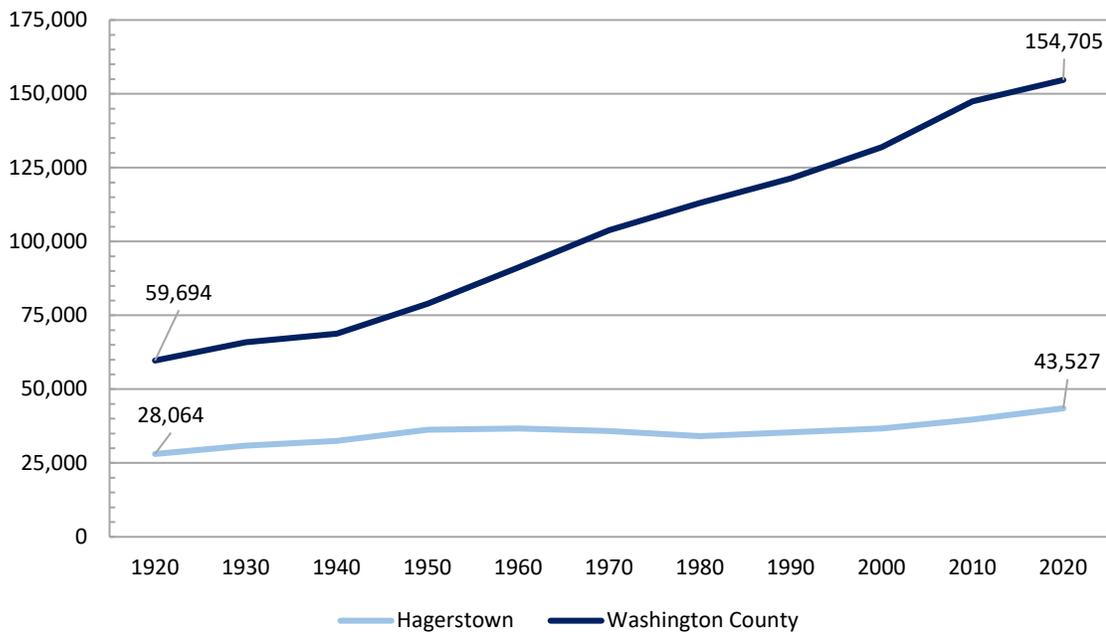
Through the 1800s, 1900s, and into the modern day, Hagerstown developed into a manufacturing center for textiles, furniture, automobiles, trucks and aircraft. The City continues to earn its “Hub City” nickname as the intersection of Interstate Highways 81 and 70 and multiple freight railroads, but also as a regional hub for business and data. There are several historic sites within a short distance of Hagerstown, including Antietam National Battlefield and the Chesapeake and Ohio Canal National Historic Park Headquarters. Downtown Hagerstown is a tourist destination itself. Home to the Maryland Symphony Orchestra and The Maryland Theatre, the City hosts several popular events such as the 2nd Saturday series of civic events, the Hagerfest Music & Arts Festival, and the 2025 Miss Maryland competition.

A. Population and Race:

Population

Since 1920, Hagerstown has grown an average of 4.0% yearly, though it experienced a small decline between 1960 and 1980 and has increased more quickly since 2000. Surrounding the City, Washington County has experienced an average 8.7% yearly growth rate since 1920. The growth of the greater Hagerstown area is due to its roles as a trade and business center, and as a bedroom community for the Washington-Baltimore-Arlington Combined Statistical Area (CSA).

Population Trends in the City of Hagerstown and Washington County, MD



Source: 1920-2020 U.S. Census

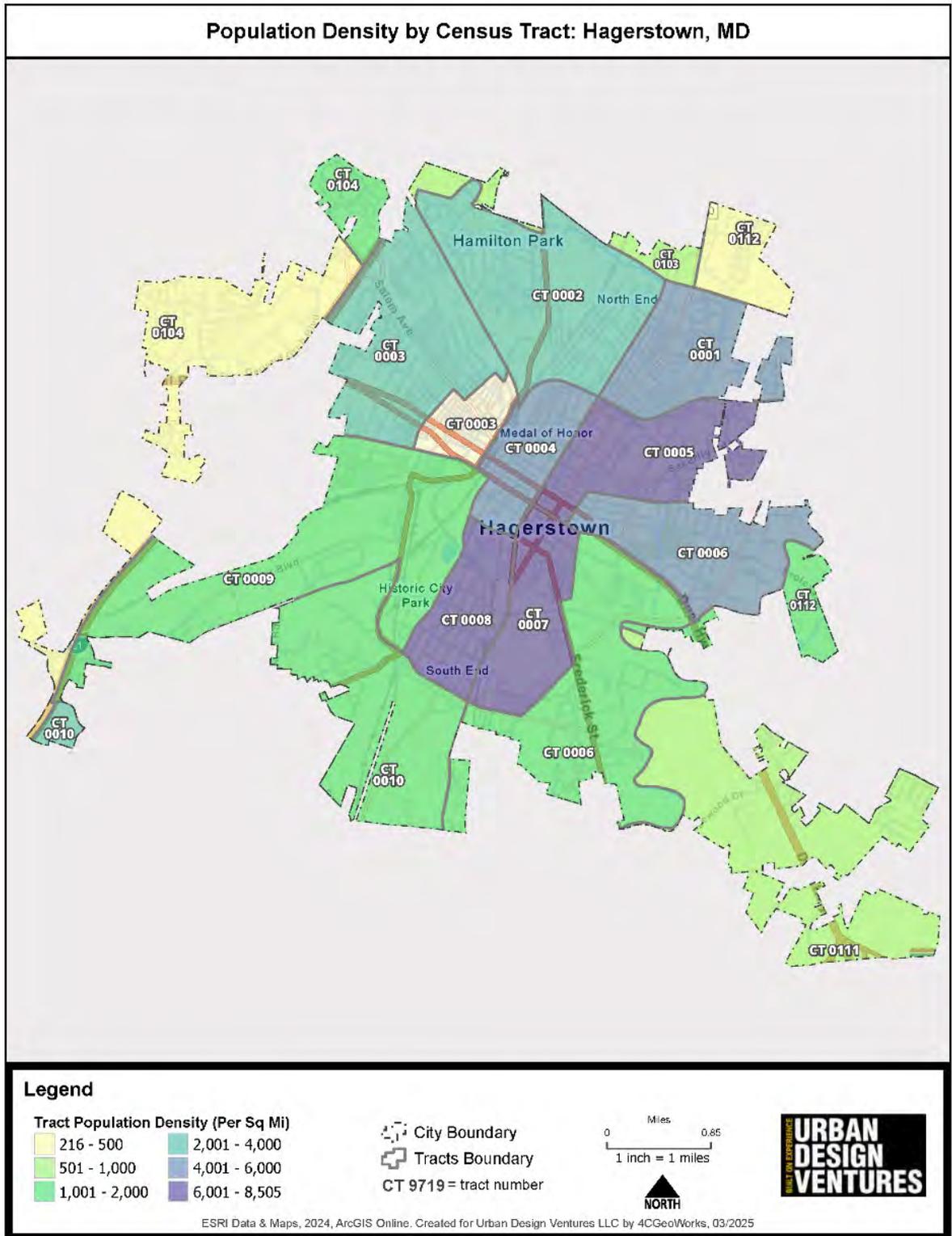
The American Community Survey (ACS) is an annual demographics survey program conducted by the United States Census Bureau. It regularly gathers information previously contained only in the long form of the decennial census, including ancestry, US citizenship status, educational attainment, income, language proficiency, migration, disability, employment, and housing characteristics. These data points are used by many public-sector, private-sector, and not-for-profit stakeholders to allocate funding, track shifting demographics, plan for emergencies, and learn about local communities.



The majority of the data used in this Analysis of Impediments is sourced from the 2019-2023 American Community Survey Estimates. Compared between 2014-2018 and 2019-2023 ACS, the City's population increased by an estimated 8.2% or 3,304 people. Over the same period, the Washington County population increased by approximately 3.5% or 5,222 persons, and the State of Maryland's population increased by 2.8% or 167,303 persons.

In 2023, there were an estimated 22,282 females (51.2%) and 21,208 males (48.8%) living in the City of Hagerstown.

The population density map below shows that the City's population is most dense in the central City area.



Population Density by Census Tract

Racial Makeup of Population

“White alone” is the largest racial cohort in Hagerstown, making up an estimated 60.9% of the City’s population in 2023. “Black or African American alone” remains the largest minority cohort at 22.9%, followed by “Two or more races” at 11.9% and Hispanic or Latino at 10.6%.

Racial Makeup of the Population in the City of Hagerstown, MD

Race and Hispanic or Latino	2014-2018 ACS		2019-2023 ACS	
	#	%	#	%
Total	40,186	-	43,490	-
White alone	28,524	71.0%	26,493	60.9%
Black or African American alone	6,777	16.9%	9,980	22.9%
American Indian and Alaska Native alone	184	0.5%	15	0.0%
Asian alone	1,144	2.8%	578	1.3%
Native Hawaiian and Other Pacific Islander alone	54	0.1%	72	0.2%
Some other race alone	812	2.0%	1,179	2.7%
Two or more races	2,691	6.7%	5,173	11.9%
Hispanic or Latino	3,391	8.4%	4,619	10.6%
Not Hispanic or Latino	36,795	91.6%	38,871	89.4%

Source: 2014-2018 and 2019-2023 ACS table DP05

Between 2018 and 2023 the City of Hagerstown’s total percentage of minority population increased by an estimated 10% (from 29.0% to 39.1%) due to a decrease in White alone population at the same time as a general population increase. The percentage and number of Asian and American Indian & Alaska Native persons also decreased, while the number of Black, Some Other Race, and Hispanic or Latino/a persons all grew.

The below table outlines the minority populations in each Census Tract represented within the City at the time of the 2014-2018 and 2019-2023 American Community Surveys. Tracts with a majority of minority (non-White and/or Hispanic or Latino/a) residents are **bold and shaded**. Hagerstown’s corporate boundaries do not correspond to the borders of Census Tracts, so the sum of the tracts’ population is larger than the total population of the City.

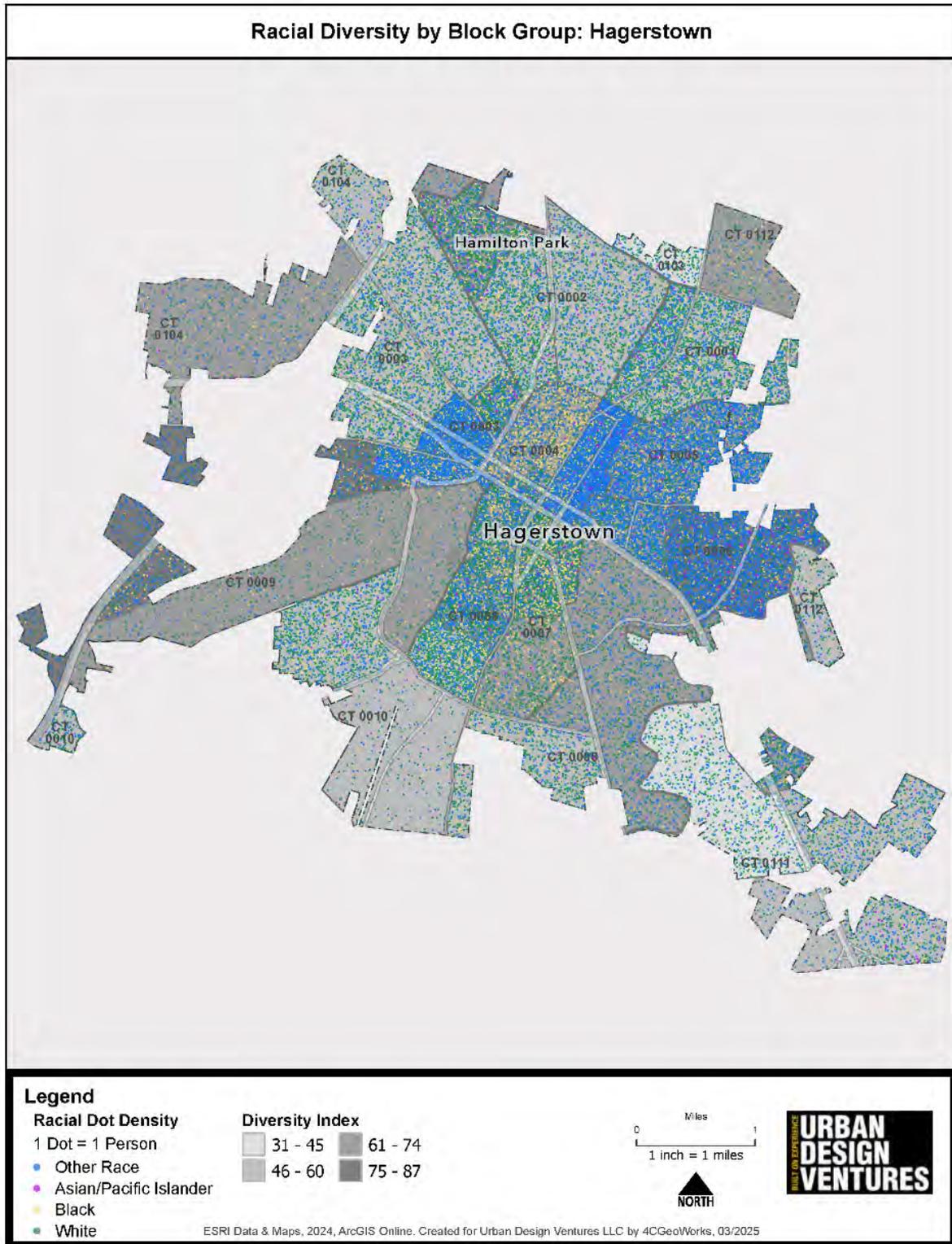
Minority Population by Census Tract

	Total Population	Minority Population	% Minority Population
1	3,939	938	23.8%
2	4,206	1,114	26.5%
3.01	3,421	1,309	38.3%
3.02	2,810	721	25.7%
4	1,607	960	59.7%
5	6,263	2,479	40.0%
6.01	2,582	837	32.4%
6.02	3,155	530	17.0%
7	3,291	1,959	59.5%
8	3,750	1,259	33.6%
9	3,781	1,686	44.6%
10.01	4,478	1,145	25.6%
103	7,848	1,599	20.6%
104.01	4,211	945	23.5%
104.02	6,605	1,967	29.8%
111	5,933	1,271	21.4%
112.02	4,989	1,483	29.7%
112.04	4,801	3,411	29.0%
Census Tract Totals	77,670	25,613	33.0%
City Total	43,490	16,997	39.1%

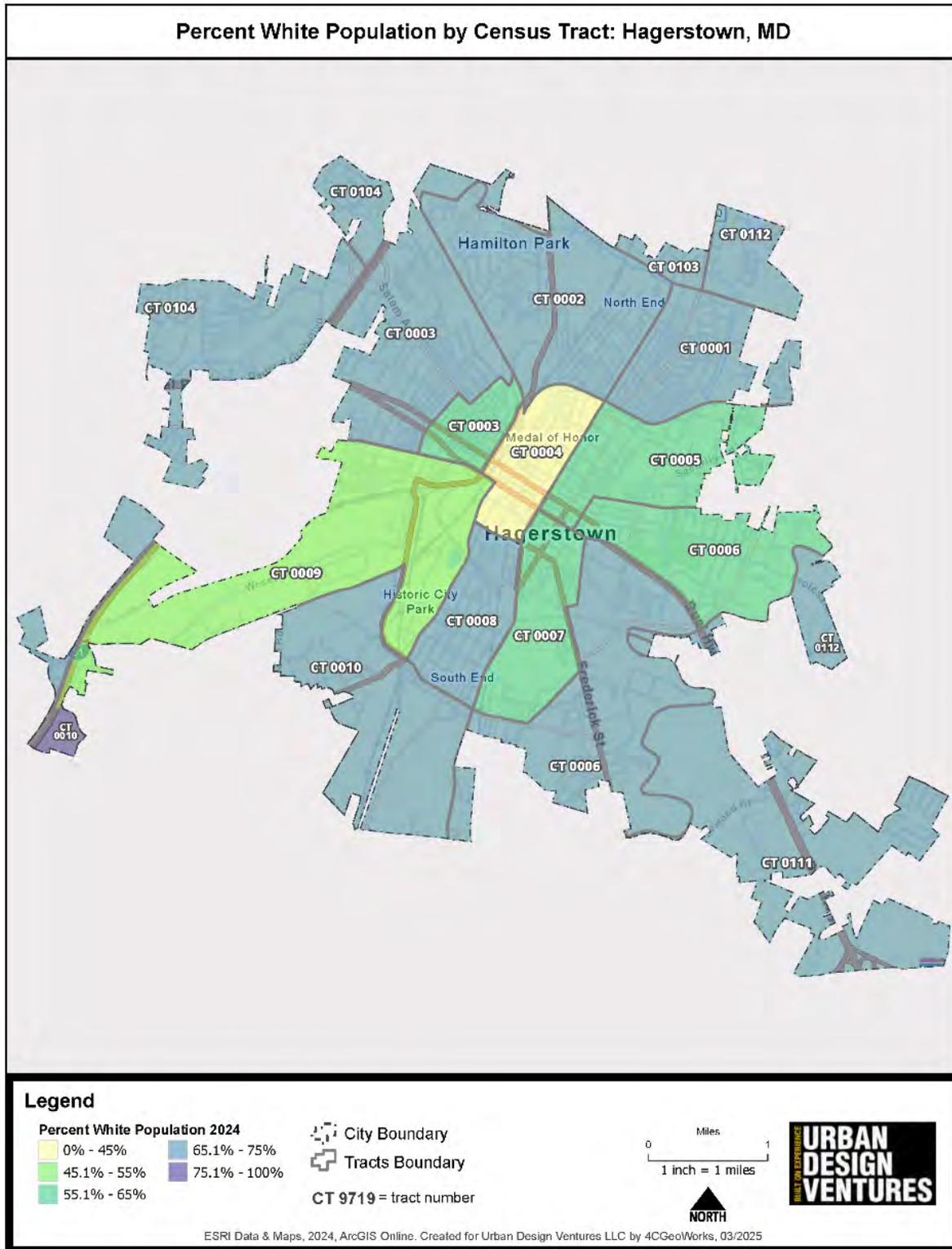
Source: 2019-2023 ACS table DP05

There is a higher concentration of minority population within the City of Hagerstown than in the surrounding census tract areas. Census Tracts 4 and 7 immediately north and south of downtown have a majority of minority (non-White and/or Hispanic or Latino/a) residents.

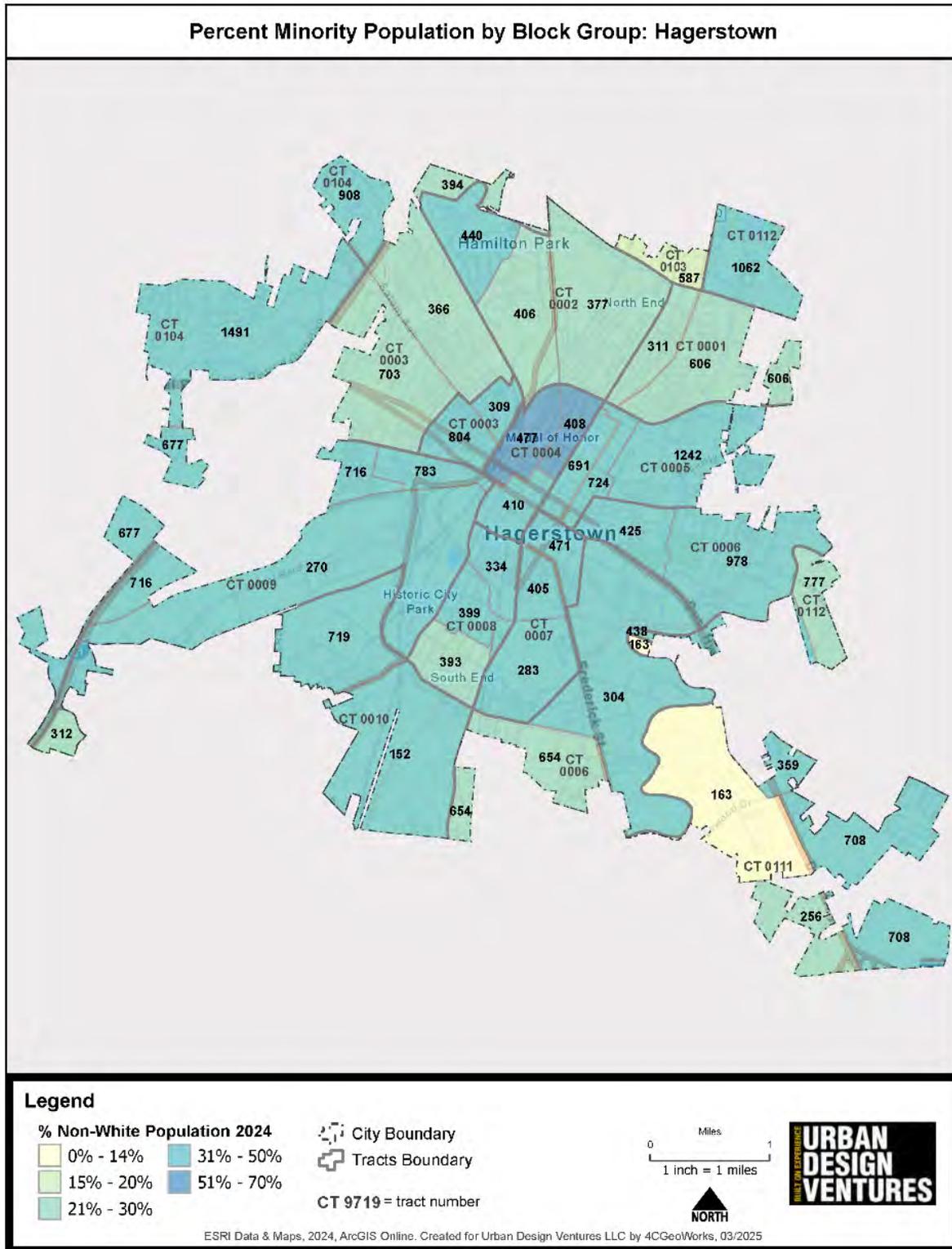
The maps below illustrate the Racial Diversity by Block Group and the percentages of White, Minority, and Hispanic Populations by Block Group in the City of Hagerstown. The darker shaded areas indicate a concentration of the specified groups.



Racial Diversity by Block Group

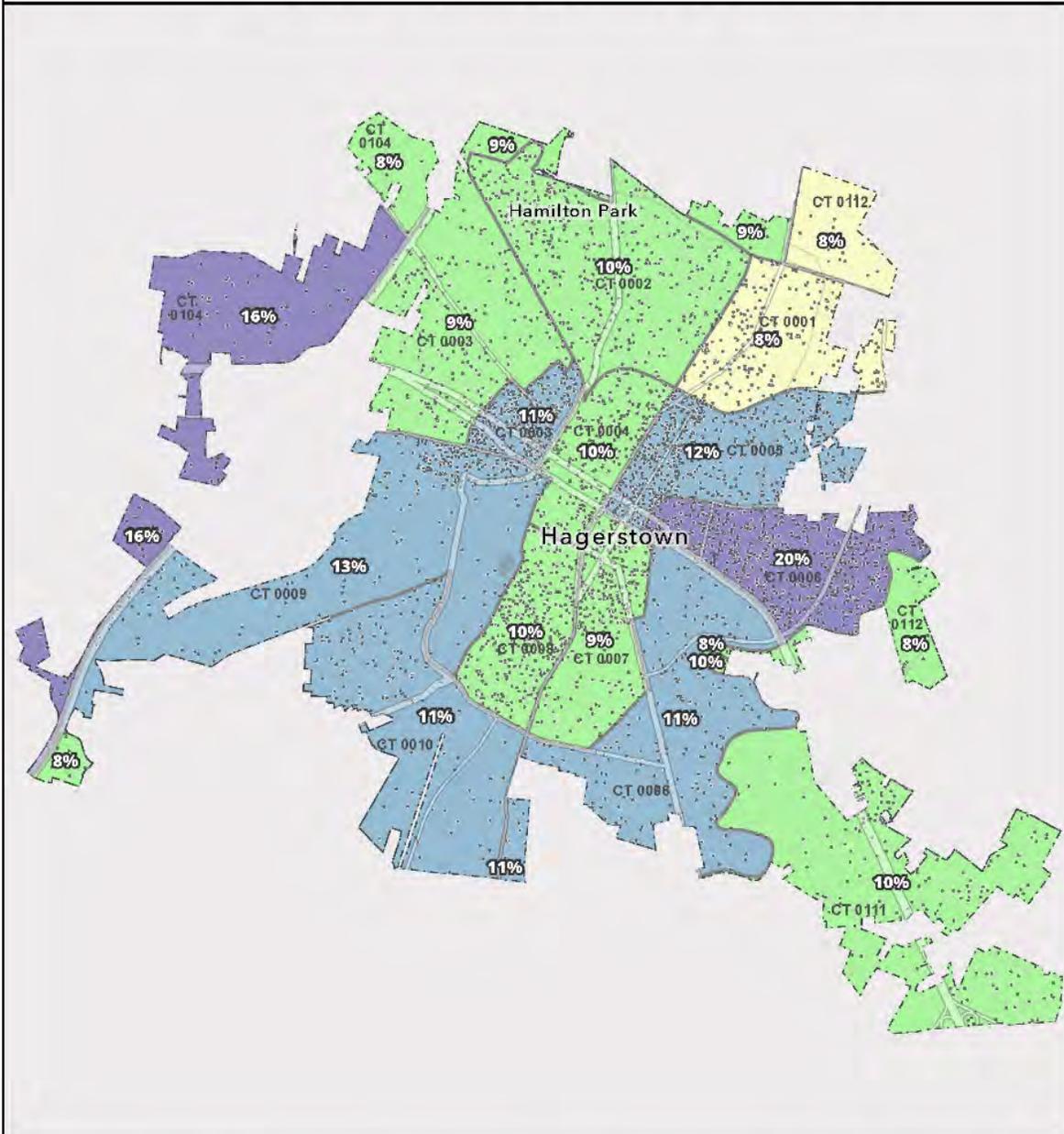


Percent White Population by Block Group



Percent Minority Population by Block Group

Percent Hispanic Population by Census Tract: Hagerstown

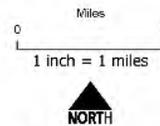


Legend

Ethnicity Dot Density
1 Dot = 1 Person
Hispanic

% Hispanic Population	
0.0% - 8.0%	Light Green
8.1% - 10.0%	Medium Green
10.1% - 15.0%	Blue
15.1% - 100.0%	Dark Purple

Census tract labels also show the percent of all races with Hispanic ethnicity.



ESRI Data & Maps, 2024, ArcGIS Online. Created for Urban Design Ventures LLC by 4CGeoWorks, 03/2025

Percent Hispanic Population by Block Group

Another way to consider racial distribution in a community is to look at the dissimilarity indices for an area. Dissimilarity indices measure the separation or integration of races across all parts of the city, county, or state. The dissimilarity index is based on the data from the 2020 U.S. Census and was calculated as part of Brown University's Diversity and Disparities Project (<http://www.s4.ad.brown.edu/projects/diversity/index.htm>). The dissimilarity index measures whether one particular group is distributed across census tracts in the metropolitan area in the same way as another group. A high value indicates that the two groups tend to live in different tracts. It compares the integration of racial groups with the White population of the City, or MSA, on a scale from 0 to 100, with 0 being completely integrated and 100 being completely separated. A value of 60 (or above) is considered very high. It means that 60% (or more) of the members of one group would need to move to a different census tract in order for the two groups to be equally distributed. Values of 40 or 50 are usually considered a moderate level of segregation, and values of 30 or below are considered to be fairly low. The chart below highlights the dissimilarity indices for various racial and ethnic groups, as compared to the White population in the City of Hagerstown.

The Black/African American population is the largest minority group in the City, making up nearly one-quarter (24.2%) of the population and having a White-Black/Black-White dissimilarity index of 21. The Asian population has a dissimilarity index of 27.8 with the White population, and the Hispanic population has a dissimilarity index of 16.1 with the White population. All other minority groups have relatively small populations, which introduces some error into the calculation of the dissimilarity indices. More specifically, for populations under 1,000 people, the dissimilarity index may be high even if the population is evenly distributed across the City, Metropolitan Statistical Area, or State.

The dissimilarity indices have decreased for each minority group since the time of the 2000 Census. Their values are all below 30, which is considered a low level of segregation.

Exposure indices refer to the racial/ethnic composition of the tract where the average member of a given group lives. For example, the average Hispanic person in some metropolis might live in a tract that is 40% Hispanic, 40% non-Hispanic white, 15% black, and 5% Asian. (Note that these various indices must add up to 100%.) These are presented as two categories: exposure of the group to itself, which is called the Isolation Index, and exposure of the group to other groups.

The isolation index is the percentage of same-group population in the census tract where the average member of a racial/ethnic group lives. It has a lower bound of zero (for a very small group that is quite dispersed) to 100 (meaning that group members are entirely

isolated from other groups). It should be kept in mind that this index is affected by the size of the group -- it is almost inevitably smaller for smaller groups, and it is likely to rise over time if the group becomes larger. The White-White isolation index in the City of Hagerstown is 62.2, Black-Black is 27.4, Hispanic-Hispanic is 10.5, and Asian-Asian is 4.3.

Indices of exposure to other groups also range from 0 to 100, where a larger value means that the average group member lives in a tract with a higher percentage of persons from the other group. These indices depend on two conditions: the overall size of the other group and each group's settlement pattern. The exposure to other groups index for Black to White in Hagerstown is 56.5 and for White to Black is 22.7. The exposure index for Hispanic to White is 58.6 and from White to Hispanic is 25, and the index for Asian to White is 55.7 and for White to Asian is 2.6.

Dissimilarity and Exposure Indices – City of Hagerstown

	Dissimilarity Index*	Isolation Index	Exposure Index*
White	--	62.2	22.7**
Black	21	27.4	56.5
Hispanic	16.1	10.5	58.6
Asian	27.8	4.3	55.7

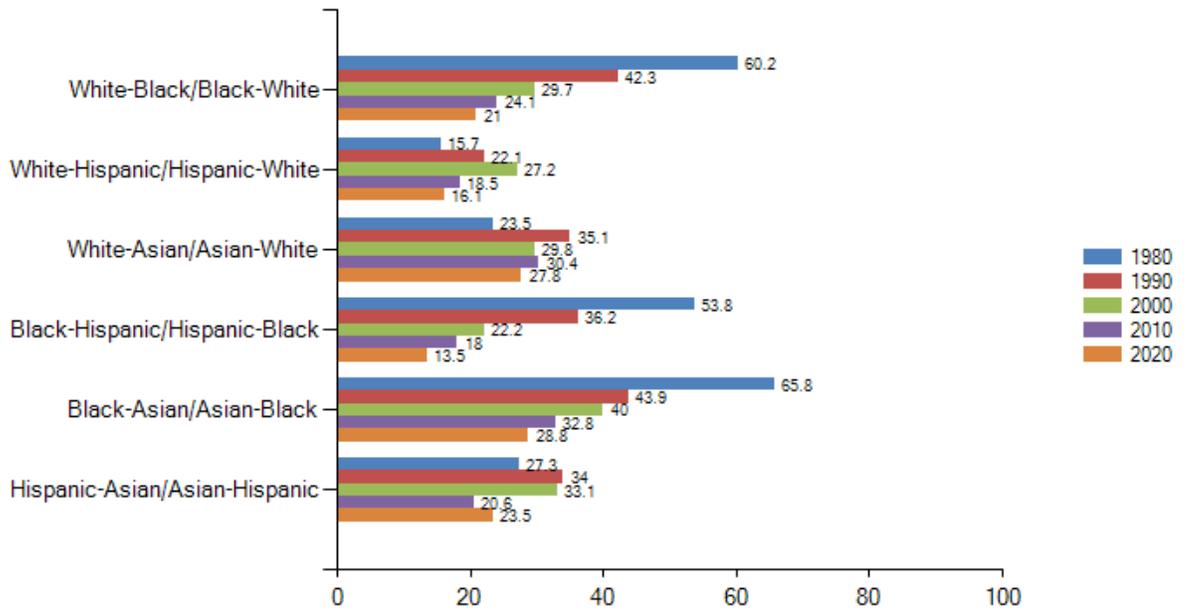
Source: American Communities Project, 2020 U.S. Census

* *Minority residents to White residents*

** *White residents to Black residents*

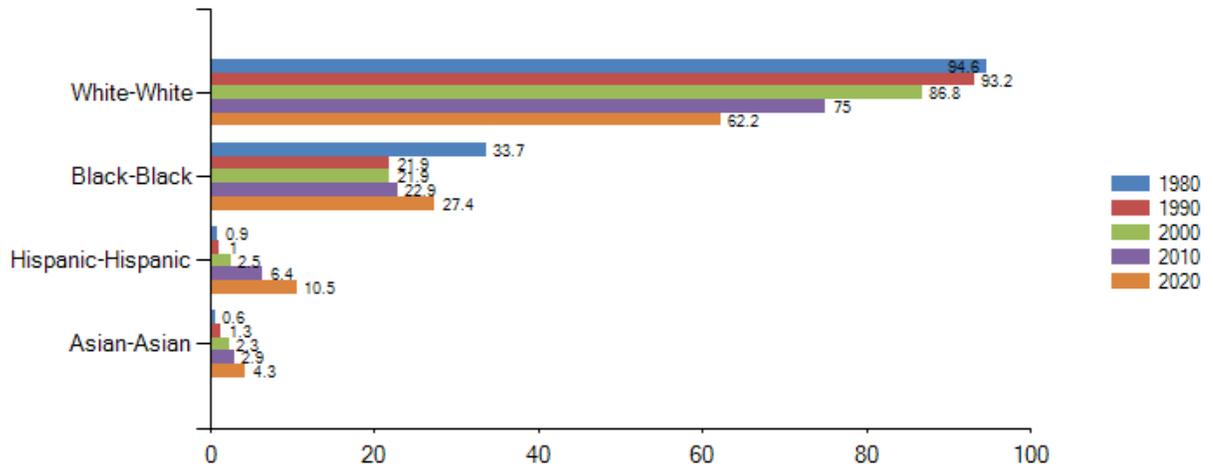
Below are charts illustrating the Dissimilarity, Isolation, and Exposure Indices for the City of Hagerstown and its various racial and ethnic groups.

Dissimilarity Index in the City of Hagerstown



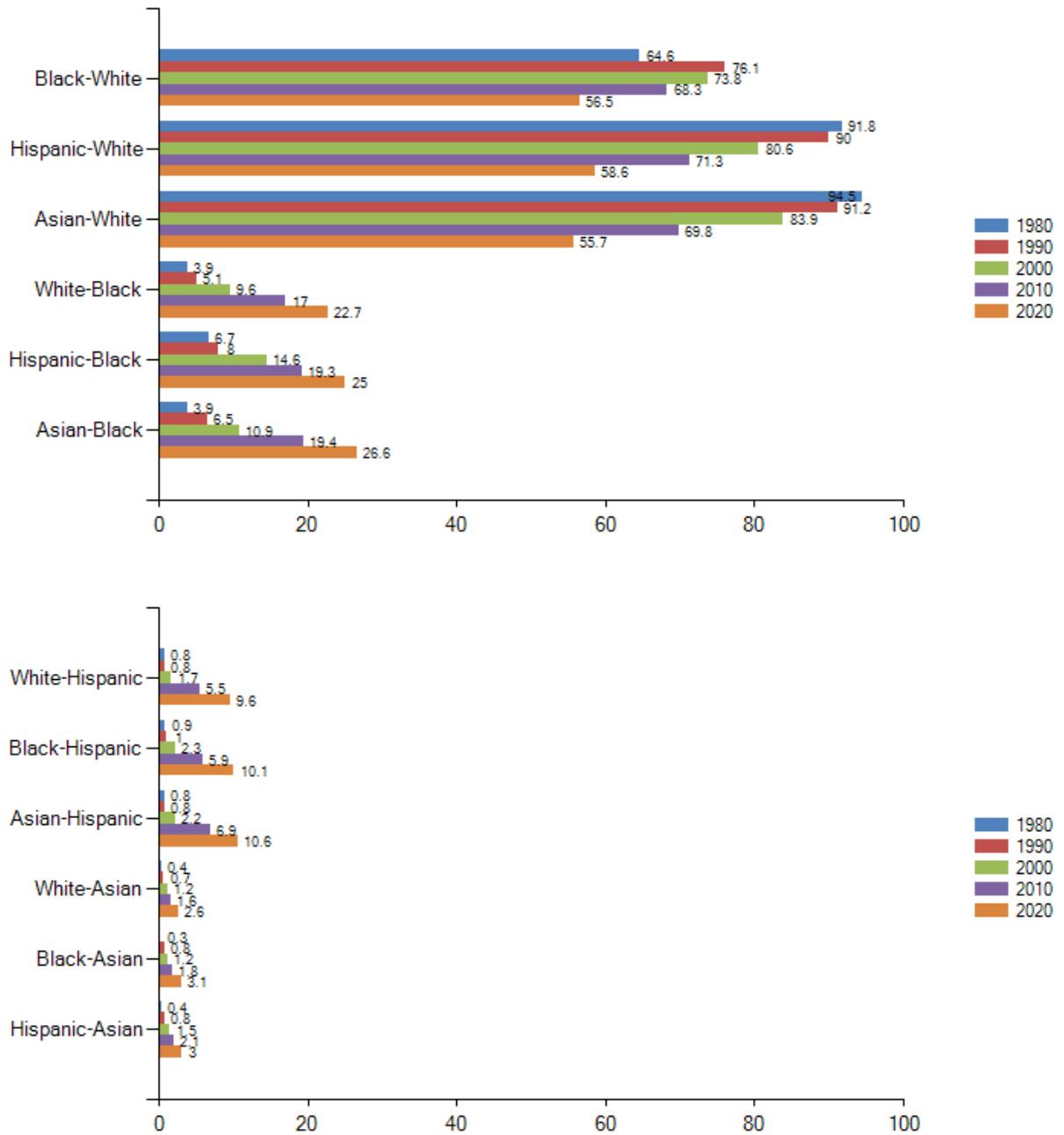
Source: American Communities Project, U.S. Census

Isolation Index in the City of Hagerstown



Source: American Communities Project, U.S. Census

Exposure Index in the City of Hagerstown



Source: American Communities Project, U.S. Census

Ethnicity

The below table highlights the ancestry and ethnicities of Hagerstown’s residents at the time of the 2014-2018 and 2019-2023 American Community Survey estimates.

Population by Ethnicity and Ancestry in the City of Hagerstown, MD

ANCESTRY	2014-2018 ACS		2019-2023 ACS	
	Number	Percent	Number	Percent
Total population	40,186	--	43,490	--
American	2,547	6.3%	2,132	4.9%
Arab	111	0.3%	73	0.2%
Czech	56	0.1%	69	0.2%
Danish	15	0.0%	26	0.1%
Dutch	278	0.7%	175	0.4%
English	2,705	6.7%	3,774	8.7%
French (except Basque)	720	1.8%	421	1.0%
French Canadian	12	0.0%	25	0.1%
German	8,652	21.5%	7,743	17.8%
Greek	104	0.3%	53	0.1%
Hungarian	63	0.2%	110	0.3%
Irish	4,177	10.4%	4,304	9.9%
Italian	2,253	5.6%	1,862	4.3%
Lithuanian	60	0.1%	20	0.0%
Norwegian	286	0.7%	138	0.3%
Polish	589	1.5%	926	2.1%
Portuguese	166	0.4%	241	0.6%
Russian	51	0.1%	272	0.6%
Scotch-Irish	334	0.8%	406	0.9%
Scottish	596	1.5%	224	0.5%
Slovak	28	0.1%	41	0.1%
Sub-Saharan African	1,075	2.7%	1,026	2.4%
Swedish	197	0.5%	127	0.3%

Swiss	151	0.4%	135	0.3%
Ukrainian	34	0.1%	66	0.2%
Welsh	254	0.6%	211	0.5%
West Indian (excluding Hispanic origin groups)	474	1.2%	373	0.9%

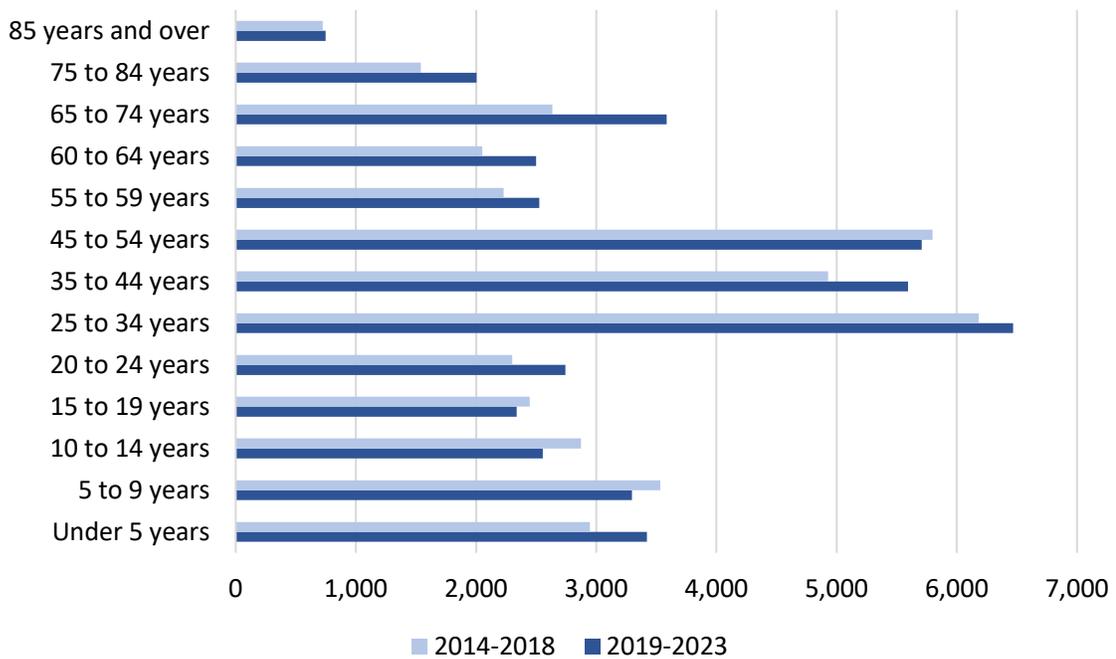
Source: 2014-2018 and 2019-2023 ACS table DP02

The most common ancestral group identified in the City of Hagerstown based on the 2014-2018 ACS data was German with 8,652 residents, comprising 21.5% of the population. The second most common ancestral group identified in the City of Hagerstown in 2012 was Irish with 4,177 residents or 10.4% of the population. In the 2019-2023 ACS, the most common ancestral group identified in the City of Hagerstown remained German with 7,743 residents (17.8% of the population) and the second-most common group remained Irish with 4,304 residents (9.9% of the population).

Age

The below chart illustrates the estimated age distribution within the City as of the 2014-2018 and 2019-2023 American Community Surveys.

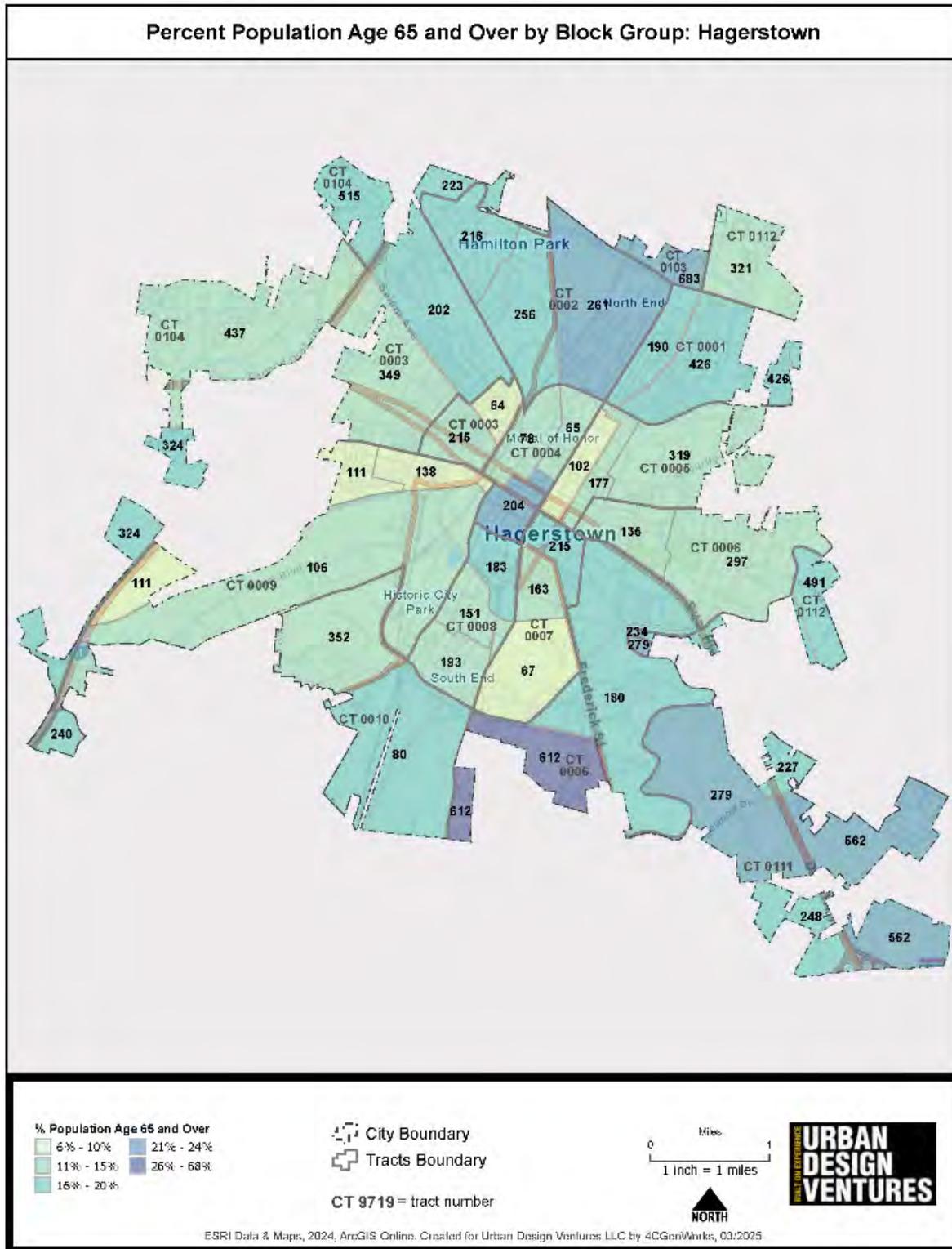
Chart II-4 – Age of Population in the City of Hagerstown, MD



Source: 2014-2018 & 2019-2023 ACS table DP05

The median age in the City of Hagerstown at the time of the 2019-2023 American Community Survey was 36.4 years, up from a median age of 34.6 years in the 2014-2018 ACS. According to the same survey, the median age in Washington County is considerably higher at 41.0 years, and the median age in the State of Maryland is also higher than the City's median age at 39.3 years. Though there has been a relative "baby boom" in the last five years in Hagerstown with an increase of nearly 500 persons under the age of 5, as well as a relative increase of persons between 20 and 44 years of age, the largest population gain has been in the population of persons age 55 and older. The single largest population gain was in the 65-to-74-year cohort, gaining nearly 1,000 persons.

The map below illustrates the population age 65 and over by Block Group in the City of Hagerstown. Senior citizens have a high concentration in Census Tract 6, which is home to a senior and assisted living community. There has been a national increase in the percentage of persons age 65 and over, and as a result, a greater need for accessibility improvements in housing and public spaces. Elderly individuals and households can be presumed to be low- or moderate-income since many are living on fixed incomes.



Percent Population Age 65 and Over by Block Group

Religion

The U.S. Census does not collect data on the religious affiliations of the population in the United States. In an effort to better understand the religious affiliations of the residents of Hagerstown, the City used the data made available by the Association of Religion Data Archives (ARDA). ARDA surveys the congregation members, their children, and other people who regularly attend church services within counties across the country. Although this data appears to be the most comprehensive available, it is unfortunately not entirely complete as it does not accurately include traditional African American denominations. The total number of regular attendees was adjusted in 2010 (the most recent year for which data is available) to represent the population including historic African American denominations. Unfortunately, the total number cannot be disaggregated to determine the distribution across denominational groups. The table below shows the distribution of residents of Washington County across various denominational groups as a percentage of the population which reported affiliation with a church.

Table II-5 compares religious affiliation in Washington County from 1980 through 2020 using data from the Association of Religion Data Archives and the US Census.

Table II-5: Religious Affiliation in Washington County, Maryland

	1980		1990		2000		2010		2020	
	#	%			#	%	#	%	#	%
Total Population:	113,086	--	121,393	--	131,923	--	147,430	--	154,705	--
Evangelical Protestant	11,989	10.6%	15,485	12.8%	18,310	13.9%	21,941	14.9%	26,592	17.2%
Black Protestant	0	--	1,941	1.6%	0	--	97	0.1%	852	0.6%
Mainline Protestant	36,374	32.2%	28,668	23.6%	27,785	21.1%	21,837	14.8%	17,985	11.6%
Catholic	6,913	6.1%	8,723	7.2%	10,675	8.1%	9,350	6.3%	8,396	5.4%
Orthodox	0	--	0	--	71	0.1%	163	0.1%	80	0.1%
Latter-day Saints	640	0.6%	556	0.5%	1,484	1.1%	1,539	1.0%	1,996	1.3%
Jehovah's Witnesses	0	--	0	--	0	--	0	--	1,006	0.7%
Other Christians	58	0.1%	69	0.1%	64	0.0%	68	0.0%	81	0.1%



Judaism	310	0.3%	300	0.2%	325	0.2%	281	0.2%	286	0.2%
Islam	0	--	0	--	300	0.2%	308	0.2%	1,432	0.9%
Hinduism	0	--	0	--	0	--	22	0.0%	0	--
Other	0	--	0	--	13	0.0%	26	0.0%	30	0.0%
Total Adherents:	56,284	49.8%	55,742	45.9%	59,027	44.7%	55,632	37.7%	58,736	38.0%
Unclaimed:	56,802	50.2%	65,651	54.1%	72,896	55.3%	91,798	62.3%	95,969	62.0%

Sources: The Association of Religion Data Archives, <https://www.thearda.com>; 1980-2020 US Census

Between 1980 and 2020, there was an 18,389 person decline in “Mainline Protestants” and a 14,603 person increase in “Evangelical Protestants.” The population of Latter-Day Saints, Jehovah’s Witnesses, and Muslims has steadily increased during each ARDA Census, while the number of Catholics peaked in 2000 and has receded. Washington County saw little change in the number of people identifying with religious traditions, but the proportion of religious adherents has decreased by about 12% over the last fifty years.

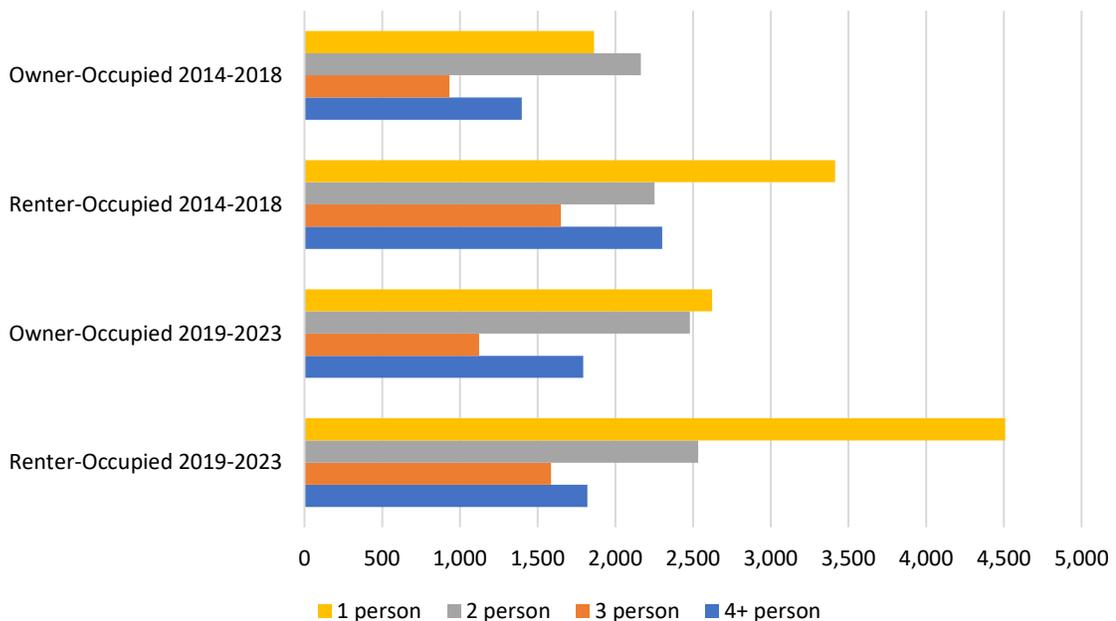
B. Households:

According to the 2014-2018 American Community Survey estimates, there were 18,290 housing units in the City of Hagerstown. Of these housing units, 15,976 (87.3%) were occupied and 2,314 (12.7%) were vacant. Of the occupied housing units, 6,359 (39.8%) were owner-occupied and 9,617 (60.2%) were renter occupied.

In the 2019-2023 ACS, the City’s total increased to 19,996 housing units. Of these units, 18,472 (92.4%) were occupied and 1,524 (7.6%) were vacant. Of the occupied housing units, 8,022 (43.4%) were owner-occupied and 10,450 (56.6%) were renter occupied.

Between the 2014-2018 and 2019-2023 American Community Surveys there was a 9.3% increase in housing units in the City of Hagerstown due to annexation, new construction, and rehabilitation. Though rental units still comprise the majority of housing units in Hagerstown, the number of owner-occupied structures has increased faster over the last five years. In 2023 the average size of the owner-occupied households was 2.44 persons and the average renter household was 2.47 persons. **Chart II-5** illustrates household size breakdown of owner and renter households.

Chart II-5 – Occupancy by Tenure in the City of Hagerstown, MD



Source: 2014-2018 & 2019-2022 ACS table S2501

The following **Table II-6** compares homeowners and renters by race. Overall, White householders are most common and Black or African American householders are next most common for both renters and homeowners. However, while there are only two hundred more White renters than homeowners there are fifteen hundred more Black renters than homeowners.

Table II-6 – Household Tenure by Race

Householder cohort	2014-2018 ACS				2019-2023 ACS			
	Owner	%	Renter	%	Owner	%	Renter	%
White alone	5,404	85.0%	6,853	71.3%	6,199	77.3%	6,384	61.1%
Black or African American alone	568	8.9%	2,081	21.6%	1,171	14.6%	2,666	25.5%
American Indian and Alaska Native alone	0	0.0%	85	0.9%	3	0.0%	10	0.1%
Asian alone	166	2.6%	140	1.5%	93	1.2%	183	1.8%
Native Hawaiian and Other Pacific Islander alone	0	--	3	0.0%	0	--	0	--
Some other race alone	83	1.3%	150	1.6%	115	1.4%	260	2.5%
Two or more races	138	2.2%	305	3.2%	441	5.5%	947	9.1%
Hispanic or Latino, any race	241	3.8%	772	8.0%	410	5.1%	871	8.3%
Total Households	6,359	--	9,617	--	8,022	--	10,450	--

Source: 2014-2018 & 2019-2023 ACS

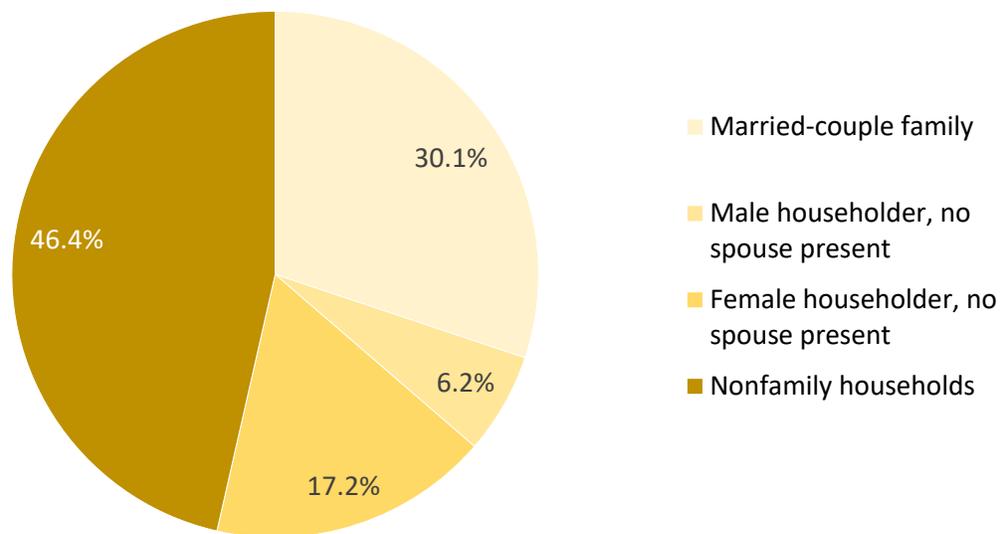
Homeownership rates for White householders have declined over the last five years, though the actual number of White householders has increased. Meanwhile, Black homeownership has risen by nearly 5% and rental rates by 4%, and there was a 3% increase in homeownership and a 6% jump in renters that were Two or More Races.

According to the 2014-2018 American Community Survey data, non-family households comprised 39.8% of all households, married-couple family households comprised 32.3% of all households, female householders with no husband present comprised 22.5% of all households, and male householders with no wife present comprised 5.4% of all households in the City.

At the time of the 2019-2023 ACS, non-family households comprised 46.4% of all households, married-couple family households comprised 30.1% of all households, female householders with no spouse present comprised 17.2% of all households, and male householders with no spouse present comprised 6.2% of all households in the City. There has been a marked decrease in the proportion of family households and married-couple households over the last five years, though the actual number of both has increased. The number and percentage of female-led households with no spouse present has decreased. In 2023 the Census also surveyed the number of cohabiting unmarried couples; this was 11.0%.

The chart below illustrates the breakdown of households by type in the City of Hagerstown using data from the 2019-2023 ACS.

Chart II-6 – Households by Type in the City of Hagerstown, MD



Source: 2019-2023 ACS Data table S2501

C. Income and Poverty:

The 2019-2023 American Community Survey reported that the estimated median household income for the City of Hagerstown was \$49,957. This is substantially lower than both Washington County’s median income of \$74,157 and less than half of the State of Maryland’s median income of \$101,652. **Table II-7** illustrates household income trends.

Table II-7 – Household Income in the City of Hagerstown, MD

Income	2014-2018 ACS		2019-2023 ACS	
	Number	Percentage	Number	Percentage
Total Households	15,976	--	18,472	--
Less than \$10,000	1,779	11.1%	1,380	7.5%
\$10,000 to \$14,999	1,250	7.8%	1,105	6.0%
\$15,000 to \$24,999	2,257	14.1%	2,285	12.4%
\$25,000 to \$34,999	1,727	10.8%	2,022	10.9%
\$35,000 to \$49,999	2,266	14.2%	2,452	13.3%
\$50,000 to \$74,999	2,897	18.1%	3,266	17.7%
\$75,000 to \$99,999	1,798	11.3%	1,888	10.2%
\$100,000 to \$149,999	1,381	8.6%	2,543	13.8%
\$150,000 to \$199,999	423	2.6%	947	5.1%
\$200,000 or more	198	1.2%	584	3.2%
Median Household Income	\$40,531	--	\$49,957	--
Mean Household Income	\$54,601	--	\$67,326	--

Source: 2014-2018 & 2019-2023 ACS

Table II-8 below identifies the Section 8 Income Limits in the Hagerstown, MD HUD Metro Fair Market Rent Area based on household size for FFY 2024. The Median Family Household Income for a family of 4 living in the Hagerstown, MD HUD Metro FMR Area was \$90,900 in 2024.



Table II-8 – Section 8 Income Limits for FFY 2024 for the Hagerstown, MD HUD Metro Fair Market Rent Area

Category	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Extremely Low (30%) Income Limits (\$)	\$19,100	\$21,800	\$25,820	\$31,200	\$36,580	\$41,960	\$47,340	\$52,720
Very Low (50%) Income Limits (\$)	\$31,850	\$36,400	\$40,950	\$45,450	\$49,100	\$52,750	\$56,400	\$60,000
Low (80%) Income Limits (\$)	\$50,900	\$58,200	\$65,450	\$72,700	\$78,550	\$84,350	\$90,150	\$96,000

Data obtained from hud.gov

Table II-9 below highlights the low- and moderate-income population in the City of Hagerstown according to HUD’s FY 2024 calculations based on the 2016-2020 ACS. The low-mod block groups are **bold and shaded**. The Hagerstown city limits span block groups, so the block group sum is greater than the City’s population.

Table II-9 – Low- and Moderate-Income in the City of Hagerstown, MD

TRACT	BLK GRP	LOW/MOD	LOWMOD UNIV	LOWMOD PCT
000100	1	1,390	2,070	67.1%
000100	2	530	1,370	38.7%
000200	1	500	1,215	41.2%
000200	2	345	1,295	26.6%
000200	3	550	1,285	42.8%
000301	1	900	1,390	64.7%
000301	2	565	1,460	38.7%
000302	1	470	665	70.7%
000302	2	1,135	1,925	59.0%
000400	1	300	320	93.8%
000400	2	720	900	80.0%
000400	3	390	430	90.7%



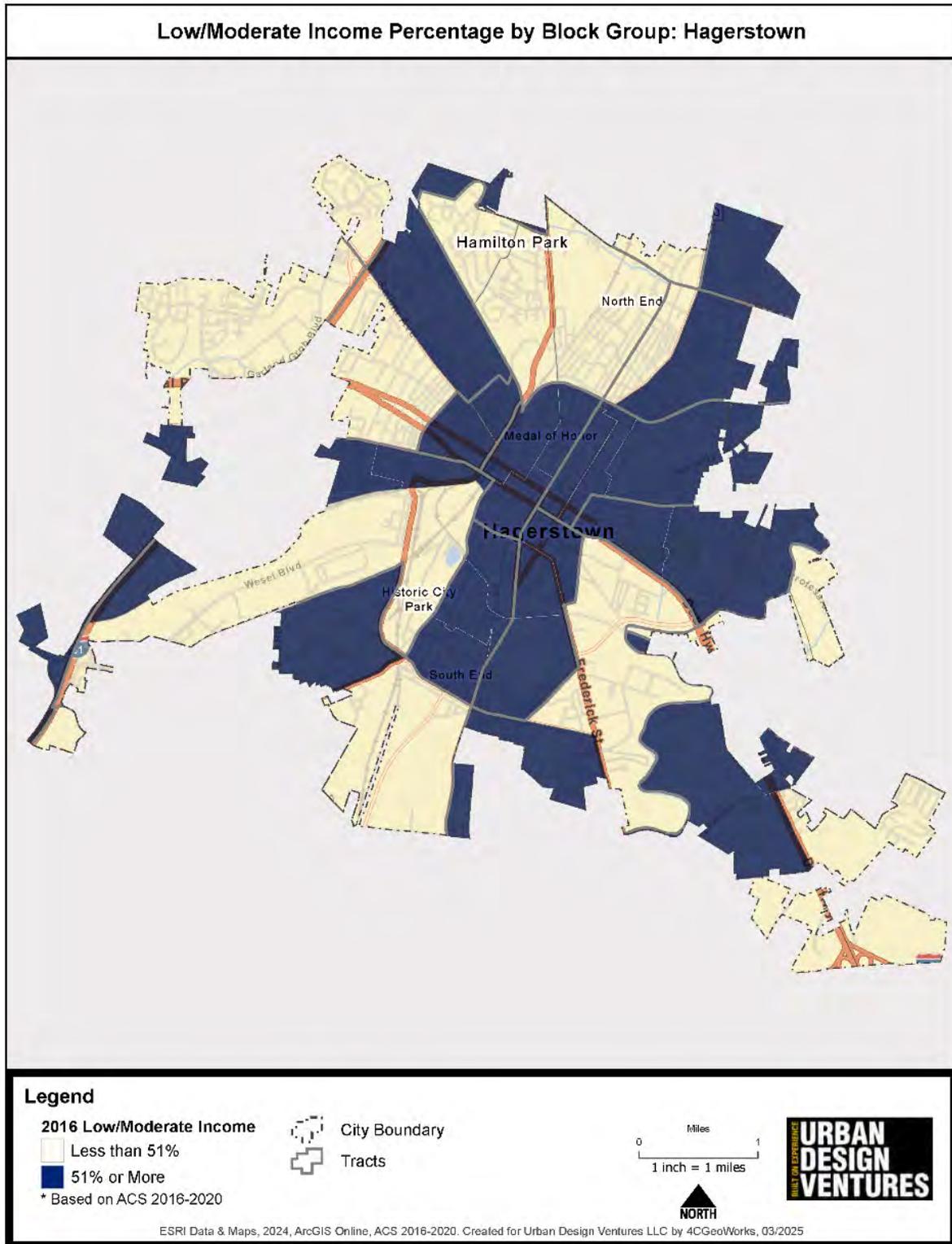
000500	1	940	990	94.9%
000500	2	1,010	1,425	70.9%
000500	3	1,620	2,890	56.1%
000601	1	710	1,385	51.3%
000601	2	475	660	72.0%
000602	1	1,360	2,260	60.2%
000602	2	285	645	44.2%
000700	1	1,075	1,155	93.1%
000700	2	1,185	1,280	92.6%
000700	3	450	640	70.3%
000800	1	1,145	1,230	93.1%
000800	2	695	1,275	54.5%
000800	3	630	920	68.5%
000900	1	750	1,165	64.4%
000900	2	920	1,475	62.4%
000900	3	195	665	29.3%
001001	1	270	595	45.4%
001001	2	1,345	2,340	57.5%
010300	1	1,170	1,550	75.5%
010300	2	535	3,080	17.4%
010401	2	535	2,420	22.1%
010402	2	1,035	2,985	34.7%
010402	3	880	1,620	54.3%
011100	1	780	1,135	68.7%
011100	2	785	1,920	40.9%
011100	3	555	1,070	51.9%
011100	5	230	1,185	19.4%
011202	4	1,265	2,215	57.1%
011204	2	580	1,550	37.4%
City of Hagerstown Total:		23,465	39,025	60.13%

Data obtained from hud.gov



As of FFY 2024, HUD estimates that well over half (60.13%) of all residents in the City of Hagerstown have a median household income of 80% or less than the Area Median Income of \$90,900. According to the 2019-2023 ACS, 22.7% of the population in the City of Hagerstown was living below the poverty level. In comparison, only 12.5% of the population of Washington County and 9.3% of the population in the State of Maryland live below the poverty level. All of these rates are decreases from the poverty rates five years earlier of 27.0% for the City, 12.7% in Washington County, and 9.4% statewide.

The following maps illustrate the percentages of Low-Income Population and Low-Income/Minority Population by Block Group in the City of Hagerstown.



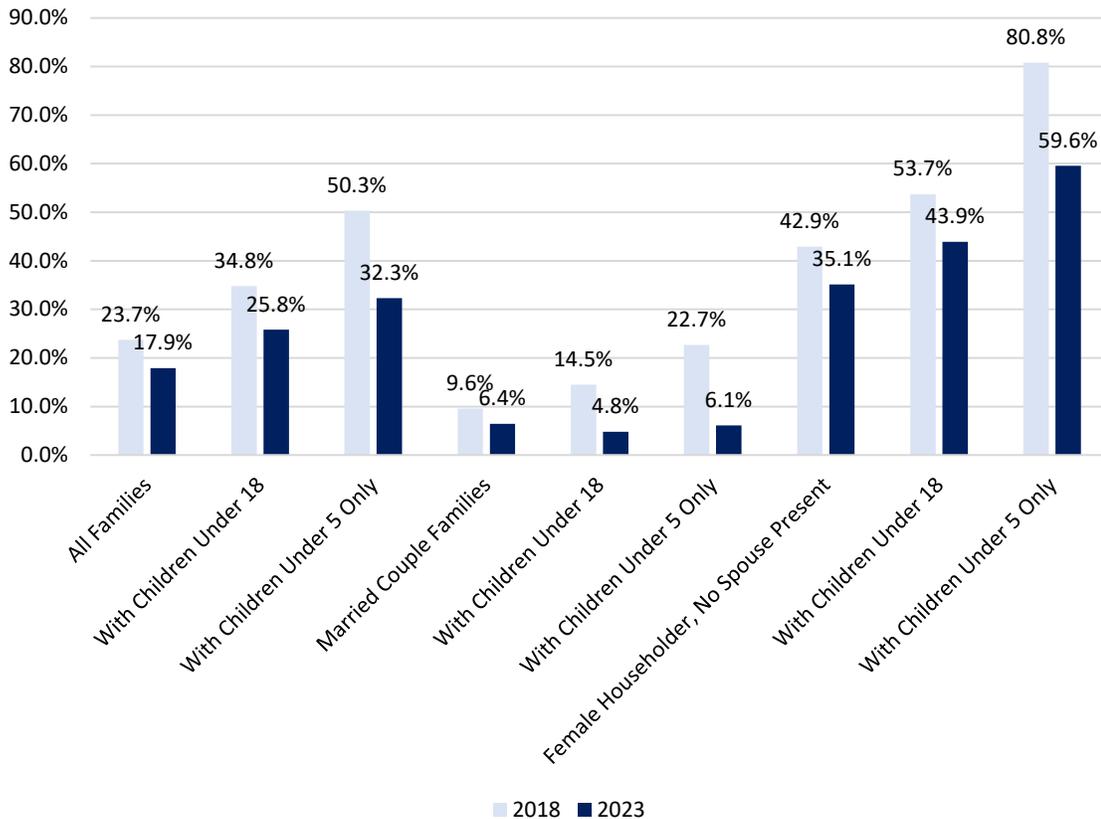
Low/Moderate Income by Block Group



Low/Moderate Income with Minority Percentage by Block Group

The 2019-2023 ACS shows that 17.9% of all families in the City of Hagerstown live in poverty. **Chart II-7** illustrates the poverty statistics for families living in the City of Hagerstown at the time of the 2014-2018 and 2019-2023 American Community Surveys.

Chart II-7 – Families in Poverty in the City of Hagerstown, MD



Source: 2014-2018 & 2019-2023 ACS table DP03

There has been a decrease in poverty levels across the board, most dramatically in the cohort of female householders (with no spouse present) having children under 5 years of age. It is unclear if these statistics will change when the ACS no longer takes into account COVID-era economic supports.

D. Employment:

According to the 2014-2018 American Community Survey estimates, the total number of eligible workers (population 16 years and over) in the City of Hagerstown was 30,304 persons. Of this population, 62.8% of eligible workers (19,038 persons) were in the civilian labor force and 5.9% of eligible workers (1,787 persons) were unemployed.

As of the 2019-2023 American Community Survey, the total number of eligible workers (population 16 years and over) in the City of Hagerstown was 33,403 persons. In 2023, 61.9% of eligible workers (20,678 persons) were in the civilian labor force and 5.2% of eligible workers (1,722 persons) were unemployed.

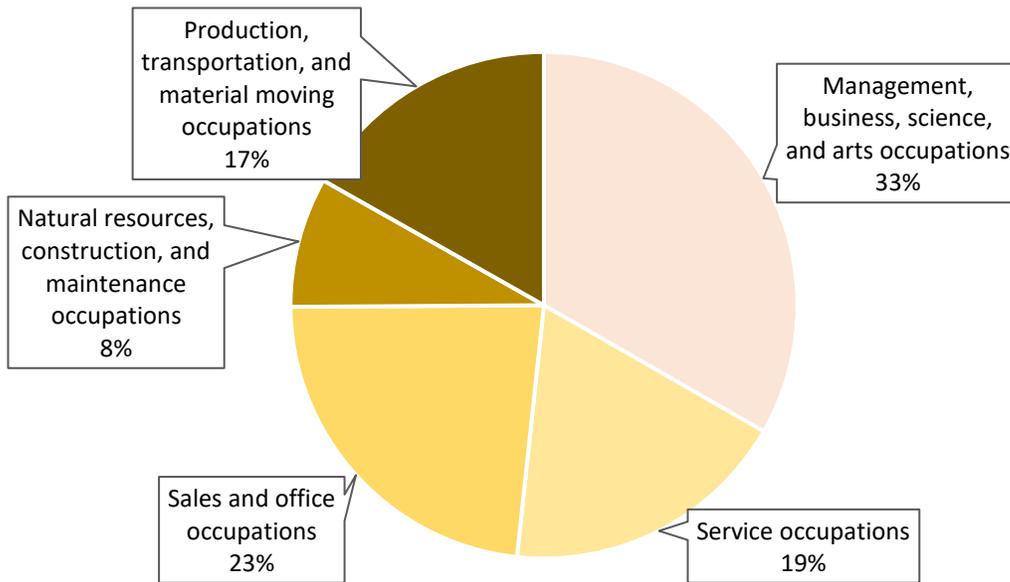
The 2019-2023 ACS estimates that workers residing in Hagerstown had a mean travel time of 25.5 minutes to work. Of the 18,728 civilian workers age 16 and over, 69.2% drove alone, 12.7% carpoolled, 1.4% used public transportation, 2.2% walked to work, and 4.3% used other means of transportation (such as taxis, ride-share apps, or bicycling). A tenth of the workforce (10.3%) worked from home.

In terms of non-employment income in the City:

- 21.9% (4,040 households) receive retirement income, with a mean income of \$25,801.
- 27.8% (5,138 households) of Hagerstown households receive Social Security Income, with a mean income of \$18,995.
- 8.7% (1,610 households) receive Supplemental Security Income, with a mean income of \$11,254.
- 4.9% (900 households) receive cash public assistance, with a mean income of \$3,491.
- 29.2% (5,394 households) received Food Stamp/SNAP benefits during FY 2023.

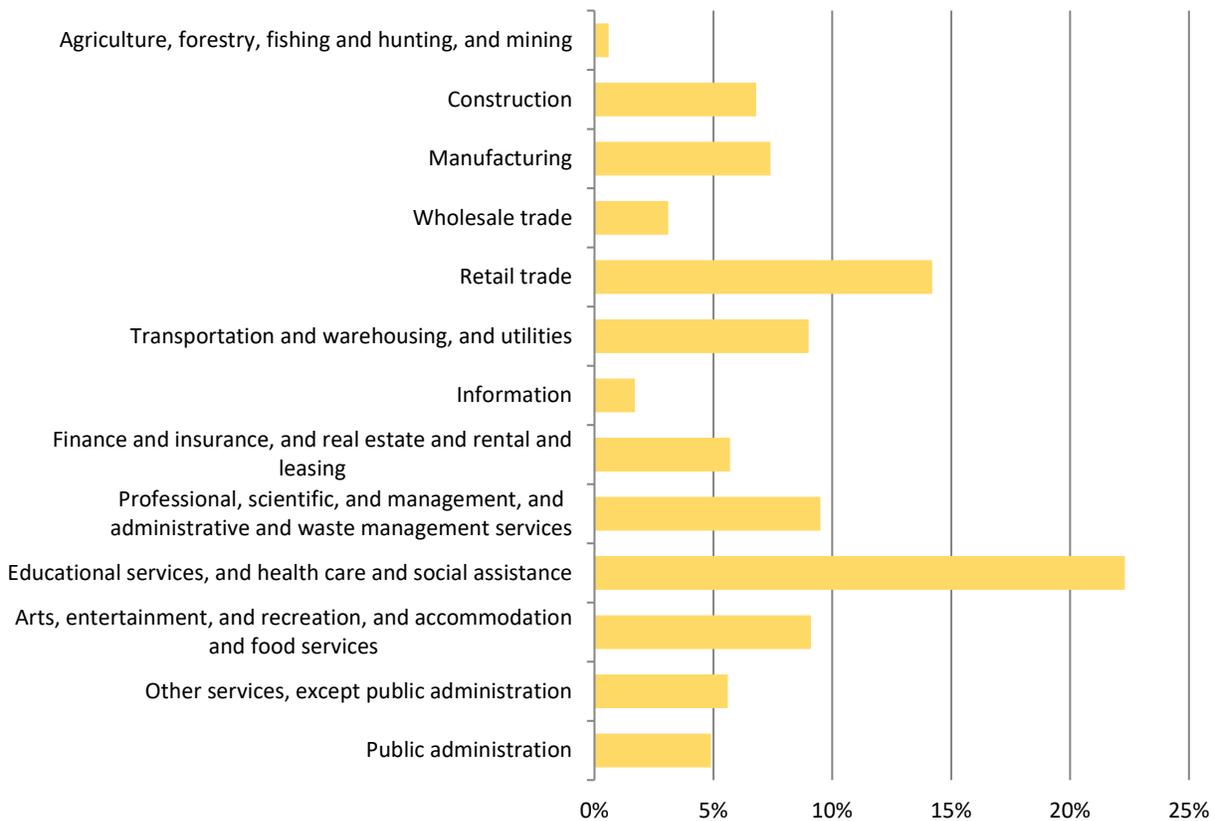
The following **Charts II-8, II-9 and II-10** outline the distribution of the City of Hagerstown workers by occupation, industry, and class respectively.

Chart II-8 – Hagerstown Occupation of Worker



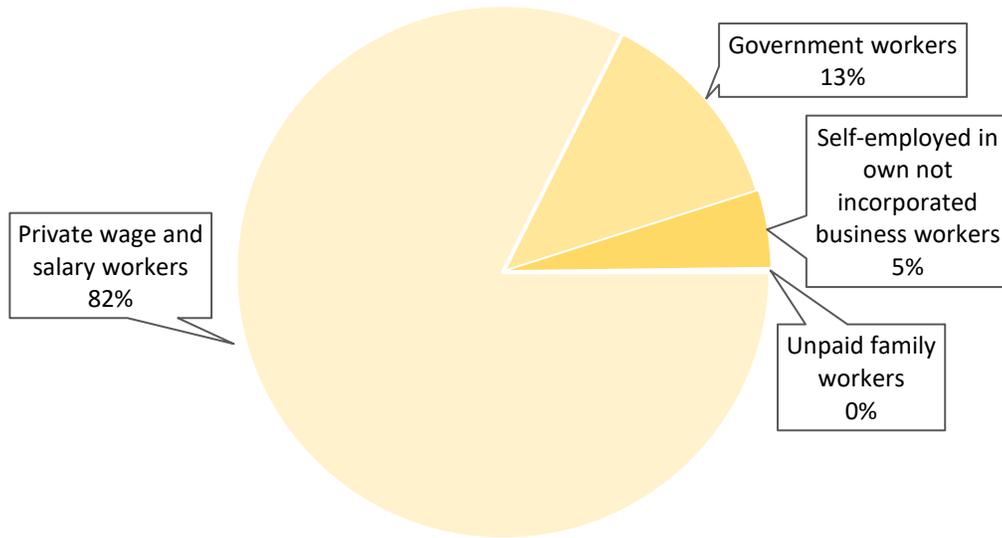
Source: 2019-2023 ACS table DP03

Chart II-9 – Hagerstown Industry of Worker



Source: 2019-2023 ACS table DP03

Chart II-10 – Hagerstown Class of Worker



Source: 2019-2023 ACS table DP03

Chart II-11 illustrates the unemployment rate trends for the Hagerstown-Martinsburg, MD-WV Metropolitan Statistical Area from January 2014 through November 2024 from the Bureau of Labor Statistics (www.bls.gov). These results are unadjusted for seasonal unemployment, which creates a “sawtooth” pattern.

Chart II-11 – Hagerstown-Martinsburg MSA Unadjusted Unemployment Rate



Source: <https://data.bls.gov>



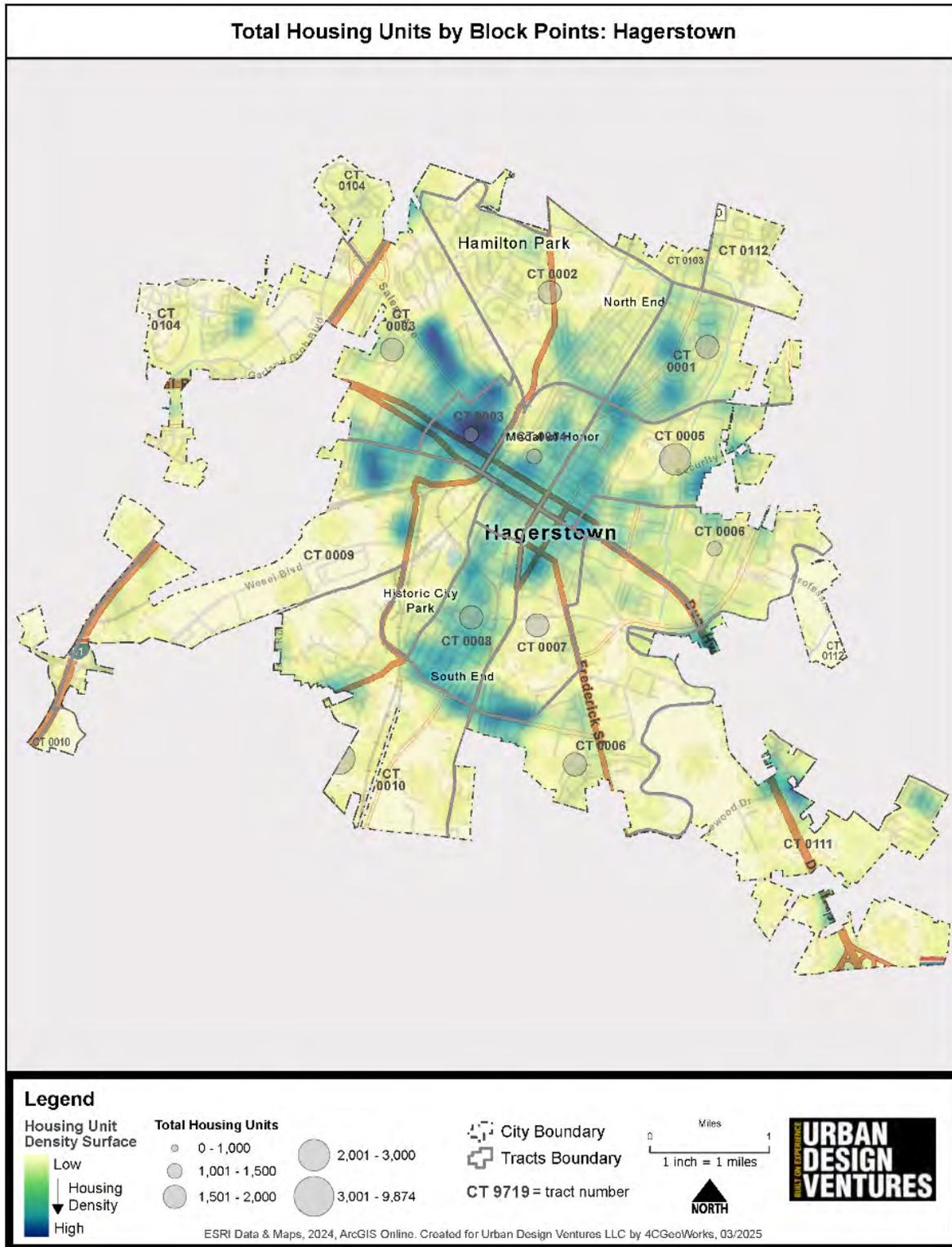
Aside from the peak COVID unemployment rate of 10.9% during April 2020, the highest unemployment rate in the Hagerstown-Martinsburg MSA was 7.0% in February 2014. Omitting the pandemic, the City of Hagerstown has experienced a steady reduction in unemployment in the past ten years – it reached a low of 2.3% unemployment in December 2022 and May 2023, and as of November 2024 is at 3.3%. During the same month of 2024, the unemployment rate of the City of Hagerstown was 4.2%, the State’s rate was 3.3%, and the national rate was 4.0%.

E. Housing Profile:

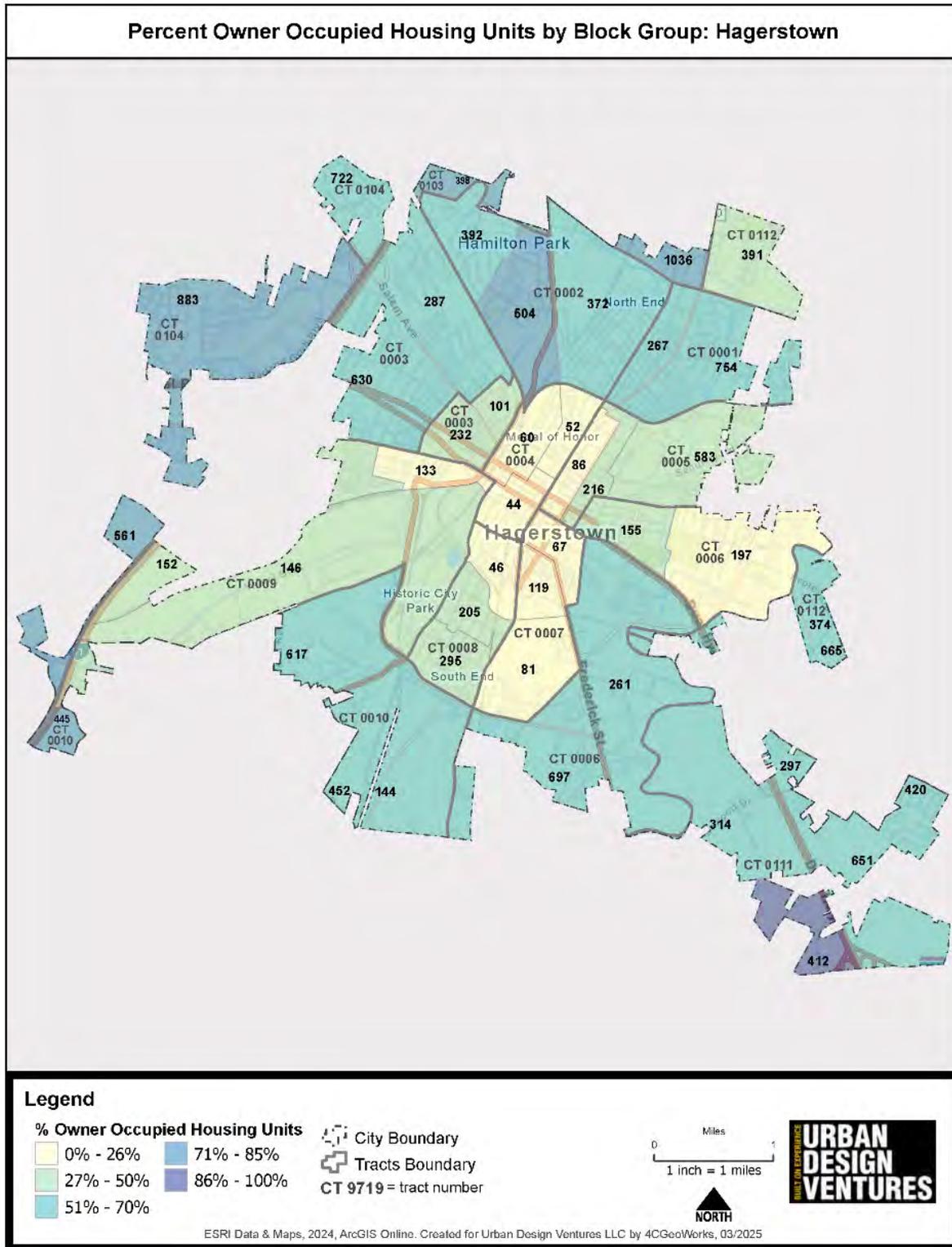
According to the 2019-2023 American Community Survey, there are 19,996 housing units in the City of Hagerstown of which 92.4% are occupied and 7.6% are vacant (over 5% higher occupancy than in the 2014-2018 ACS).

The densest concentration of housing in Hagerstown is just west of downtown in Census Tract 3, with relatively concentrated housing in Census Tracts 1, 4 and 8. The highest concentration of rental housing is located in Census Tract 4, with between 70 and 100% renter-occupied housing; portions or all of Census Tracts 3, 6, 7, and 9 have more than 51% renter-occupied housing as well. In contrast, owner-occupied housing is concentrated in Census Tracts 2, 10, 103, 104, and 111 bordering the municipal boundary. Finally, vacant housing units are concentrated in block groups within Census Tracts 3, 4, 8 and 10 in the center and southern portions of the City, with one block group in Census Tract 4 having over 25% vacant housing units.

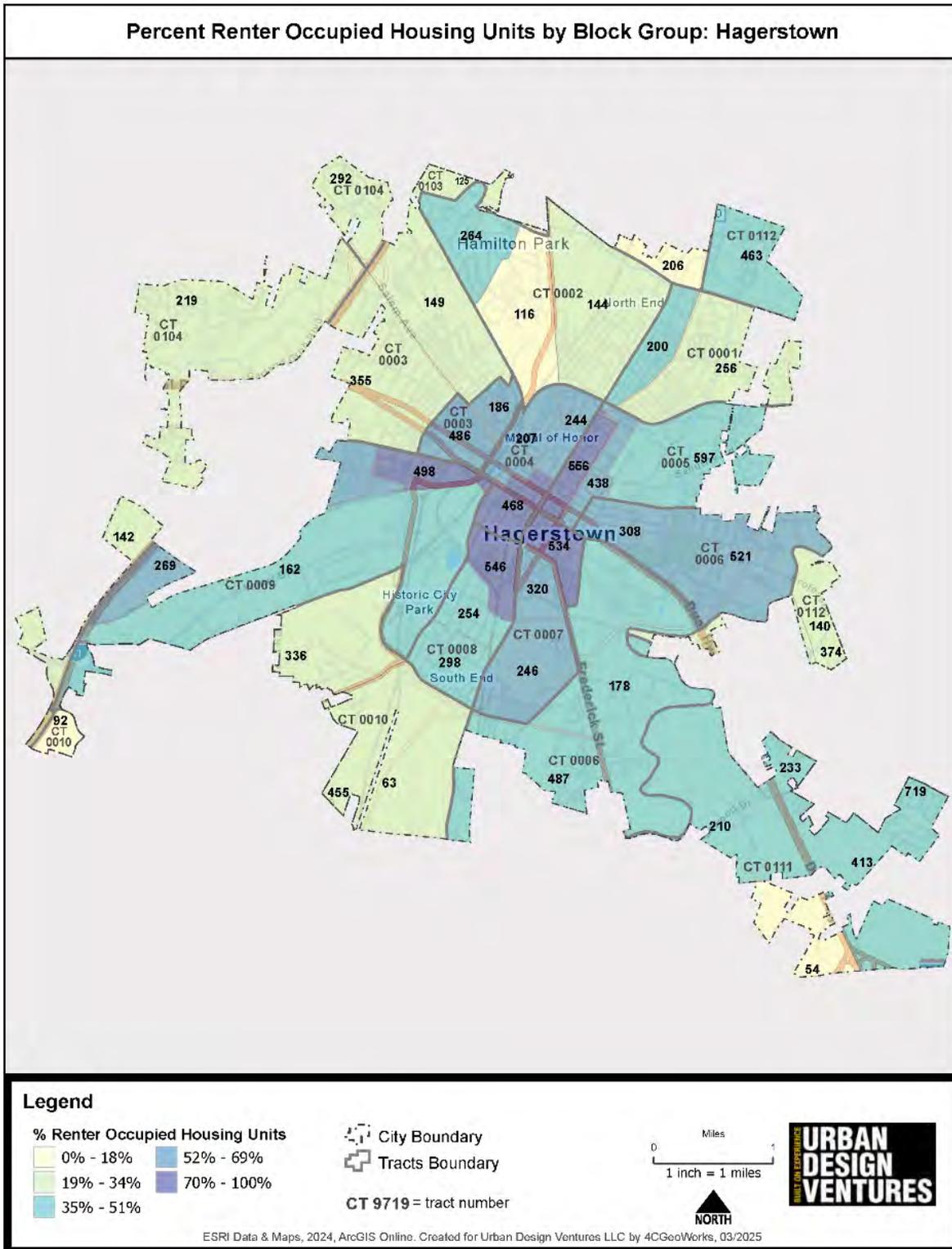
The maps below illustrate the Total Housing Units and the percentages of Owner-Occupied, Renter-Occupied and Vacant Housing Units by Block Group in the City of Hagerstown, with higher density indicated in the color blue.



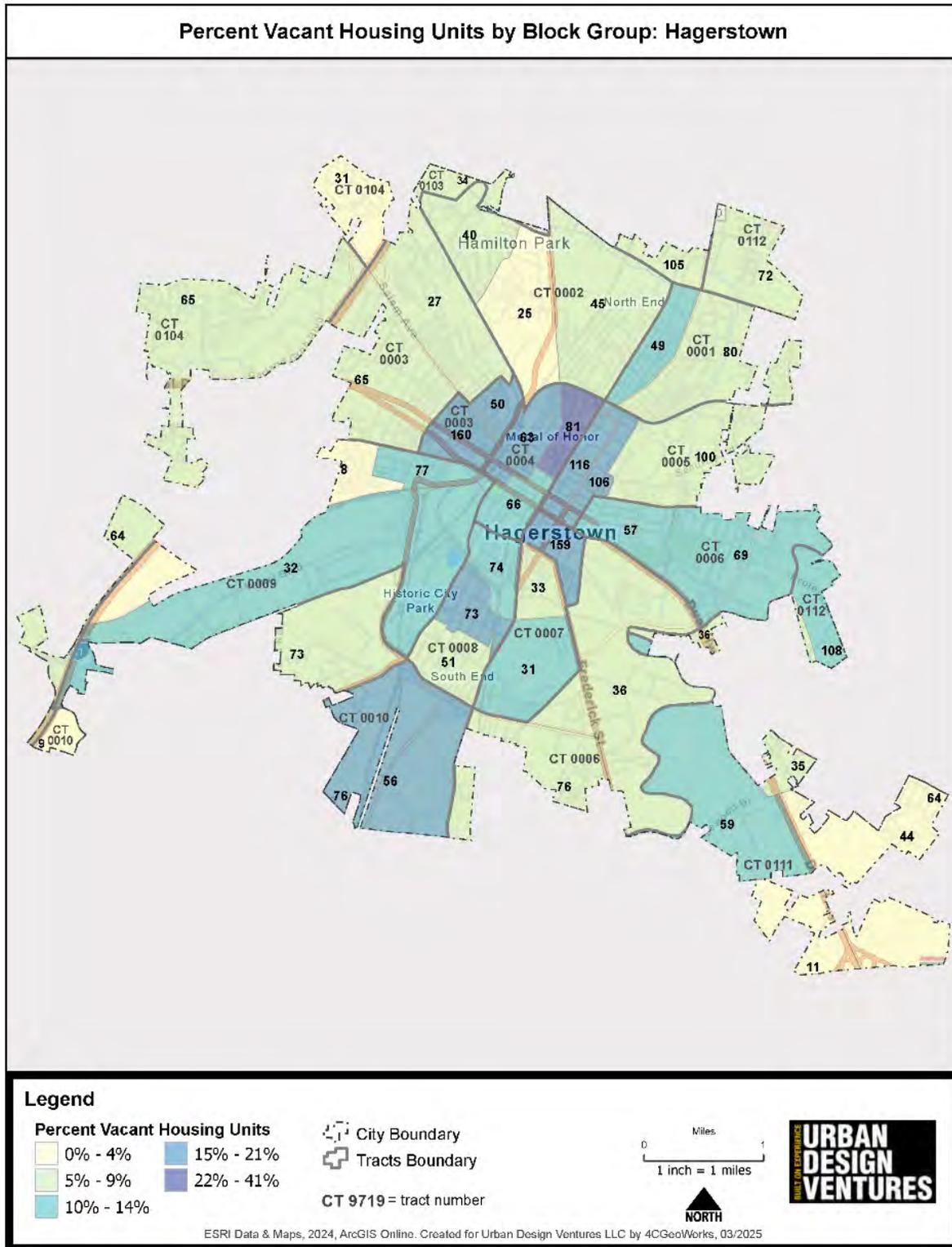
Total Housing Units by Block Points



Percent Owner Occupied Housing Units by Block Group



Percent Renter Occupied Housing Units by Block Group



Percent Vacant Housing Units by Block Group

Builders in the City of Hagerstown have consistently constructed at least one thousand homes during each decade since the 1940s. **Table II-11** illustrates the year that housing structures were built in the City of Hagerstown based on the 2014-2018 and 2019-2023 American Community Survey.

Table II-11 – Year Structure Built in the City of Hagerstown, MD

Housing Profile	2014-2018 ACS		2019-2023 ACS	
	Number	Percent	Number	Percent
Total Housing Units	18,290	--	19,996	--
Built 2020 or later	--	--	102	0.5%
Built 2010 to 2019	104	0.6%	1,179	5.9%
Built 2000 to 2009	420	2.3%	2,364	11.8%
Built 1990 to 1999	1,735	9.5%	1,575	7.9%
Built 1980 to 1989	1,546	8.5%	1,637	8.2%
Built 1970 to 1979	1,630	8.9%	1,855	9.3%
Built 1960 to 1969	1,651	9.0%	1,647	8.2%
Built 1950 to 1959	1,467	8.0%	2,187	10.9%
Built 1940 to 1949	2,072	11.3%	1,263	6.3%
Built 1939 or earlier	1,556	8.5%	6,187	30.9%

Source: 2014-2018 and 2019-2023 ACS table DP04

The State of Cities Data Systems (SOCDS) provides data for individual Metropolitan Areas, counties, and municipalities. The table below illustrates the number of residential construction permits issued between January 2014 and December 2023:

Table II-12 – Number of Residential Permits Issued in the City of Hagerstown and Washington County, MD, 2014-2023

Year	City of Hagerstown, MD			Washington County, MD		
	Single Family	Multifamily	Total	Single Family	Multifamily	Total
2014	26	80	106	192	80	274
2015	22	0	22	218	102	320
2016	25	0	25	194	6	200
2017	26	0	26	246	62	308

2018	40	0	40	306	4	310
2019	41	0	41	245	2	247
2020	82	0	82	282	2	284
2021	94	0	94	330	2	332
2022	79	0	79	311	232	543
2023	66	0	66	267	0	267
Total	501	80	581	2,591	492	3,083

Source: State of Cities Data Systems (SOCDS)

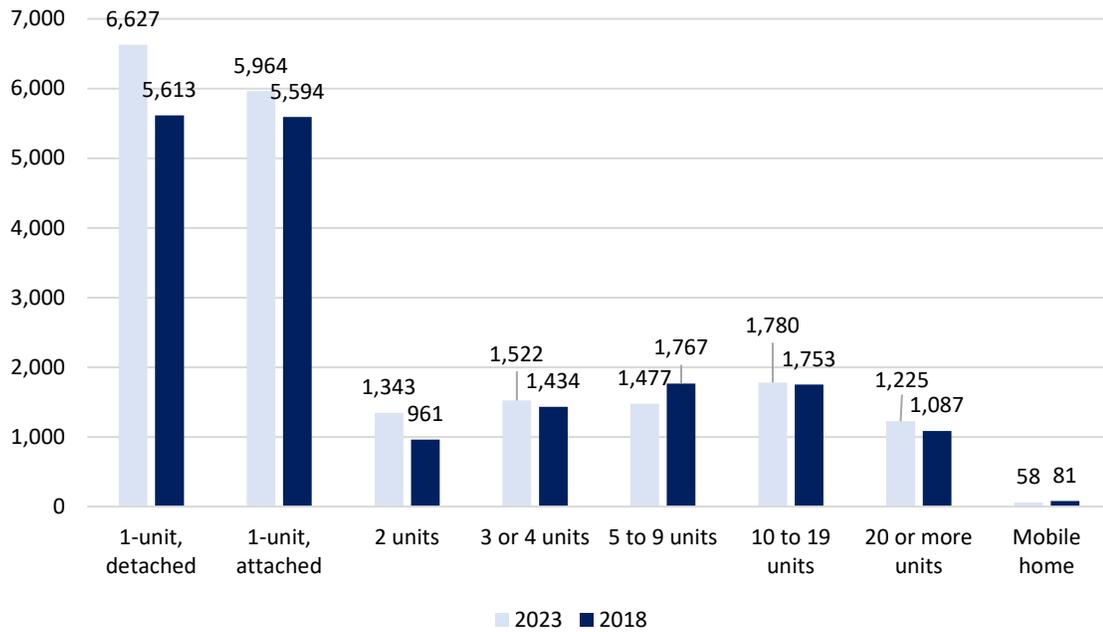
From January through November 2024 (the last available month of data) there were an average of 4.7 building permits issued per month in the City of Hagerstown and 20.4 building permits per month in Washington County. Most of these permits were issued between May and September in the County, and between July and September in the City. The majority of permits in the City (40 permits) were issued for single-family homes, though unlike the last ten years there were twelve (12) permits issued for multifamily units. The vast majority of permits issued in the County (208) were for single-family homes with only 16 permits issued for multifamily housing.

According to the 2014-2018 American Community Survey estimates, the City’s housing stock primarily consisted of single-family detached (30.7%) and single-family attached (30.6%) housing units; 38.3% of all homes were in multifamily units from duplexes to 20+ unit structures, but only 0.4% were mobile homes. The median value of owner-occupied homes in the City of Hagerstown in 2018 was \$152,200 compared to \$208,200 for Washington County and \$305,500 for the State of Maryland.

As of the 2019-2023 American Community Survey estimates, there were proportionally more single-family detached homes (33.1%) than detached (29.8%), though the number of both had increased. 36.8% of housing units were in multifamily structures, distributed fairly evenly from 2-unit duplexes all the way to 20+ unit structures. In 2023, mobile homes made up only 0.3% of the housing stock and were fewer in number than in 2018. The median value of owner-occupied homes in the City of Hagerstown in 2023 rose dramatically to \$207,700 but still lagged behind Washington County (\$275,900) and the State of Maryland (\$397,700).

Overall, the values of the housing stock in the City of Hagerstown are lower than those of Washington County and the State of Maryland as a whole, but all of these have increased considerably since 2018. **Chart II-11** shows the change in types of housing stock. Note: there were no residents living in boats, RVs, or vans during either survey.

Chart II-11 – Housing Stock Type in the City of Hagerstown, MD



Source: 2014-2018 & 2019-2023 AC table DP04

F. Financing:

Owner Costs

The median monthly costs for homeowners with a mortgage in the City of Hagerstown according to the 2019-2023 American Community Survey was \$1,459, compared to \$1,316 in the 2014-2018 ACS (a 10.9% increase). During the same period, median income increased by approximately 23.3% from \$40,531 to \$49,957. However, these figures do not account for increases in non-housing costs of living.

Table II-14 illustrates mortgage status and selected monthly owner costs.

Table II-14 – Mortgage Status and Selected Monthly Owner Costs

Monthly Owner Cost	2014-2018 ACS		2019-2023 ACS	
	Number	Percentage	Number	Percentage
Houses with a Mortgage	4,394	69.1%	5,557	69.3%
Less than \$500	79	1.8%	41	0.7%
\$500 to \$999	917	20.9%	775	13.9%
\$1,000 to \$1,499	1,886	42.9%	2,153	38.7%
\$1,500 to \$1,999	1,020	23.2%	1,452	26.1%
\$2,000 to \$2,499	340	7.7%	664	11.9%
\$2,500 to \$2,999	94	2.1%	296	5.3%
\$3,000 or more	58	1.3%	176	3.2%
Median (dollars)	\$1,316	--	\$1,459	--
Houses without a Mortgage	1,965	30.9%	2,465	30.7%
Median (dollars)	\$454	--	\$543	--

Source: 2014-2018 and 2019-2023 ACS table DP04

The number of homes in Hagerstown without a mortgage slightly decreased from 30.9% in 2018 to 30.7% in 2023, though the number of homeowners without a mortgage did increase. This indicates that there were more persons purchasing a home than paying off mortgages (or purchasing homes with cash or other non-mortgage instruments.)

Table II-15 illustrates housing costs for owner-households. These cost burdens have risen over the last five years, especially for homeowners with a mortgage.

Table II-15 – Selected Monthly Owner Costs as a Percentage of Household Income

Owner Costs as a % of Income	2014-2018 ACS		2019-2023 ACS	
	Number	Percentage	Number	Percentage
Housing Units with a Mortgage (Excluding those whose monthly costs cannot be calculated)	4,394	--	5,459	--
Less than 20 percent	1,859	42.3%	2,284	41.8%
20 to 24.9 percent	630	14.3%	688	12.6%
25 to 29.9 percent	452	10.3%	479	8.8%
30 to 34.9 percent	356	8.1%	322	5.9%
35 percent or more	1,097	25.0%	1,686	30.9%
Not computed	0	--	98	--
Housing Units without a Mortgage (Excluding those whose monthly costs cannot be calculated)	1,957	--	2,331	
Less than 30 percent	1,634	83.5%	1,985	85.2%
30 percent or more	323	16.5%	346	14.8%
Not computed	8	--	134	--

Source: 2014-2018 and 2019-2023 ACS table DP04

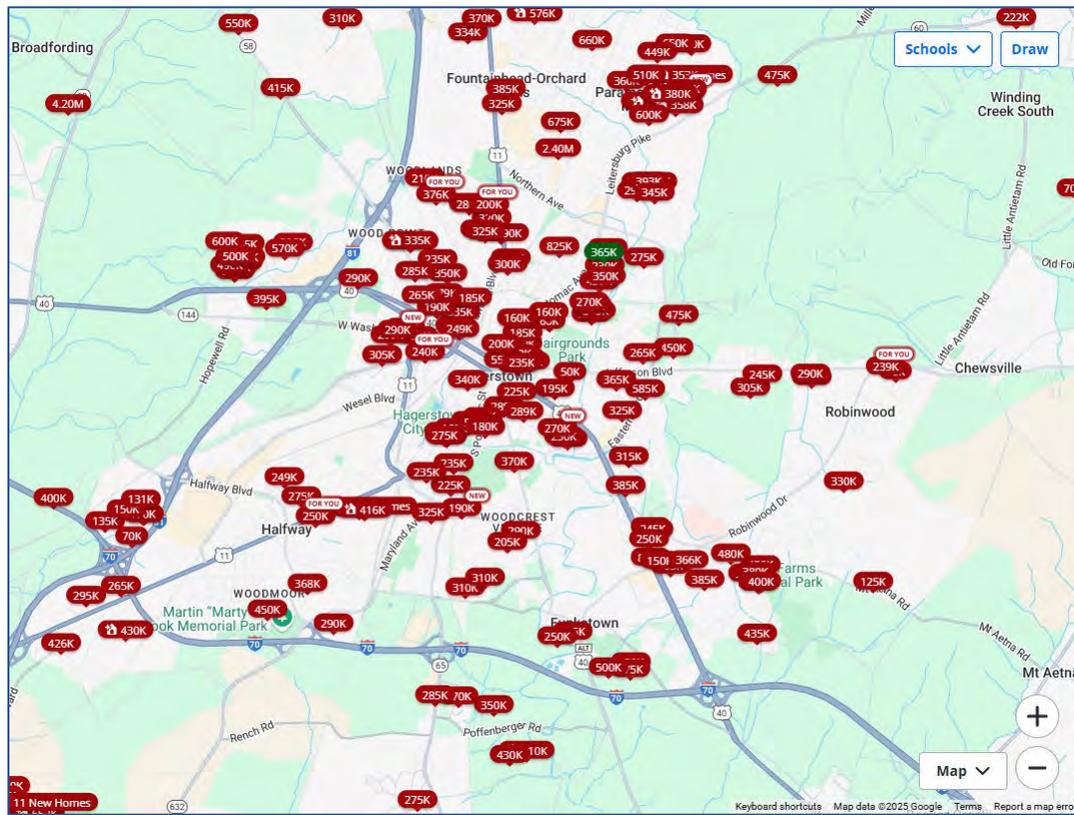
The median value of owner-occupied homes in the City of Hagerstown in 2023 was \$207,700 compared to \$275,900 for Washington County and \$397,700 for the State of Maryland according to the 2013-2017 American Community Survey. Along with the significantly lower home values – close to a third less than Washington County, just over half the statewide median – the percent of persons living in poverty in Hagerstown is much higher at 22.7% compared to 12.5% for Washington County and 9.3% statewide. As a result of the lower median income and high poverty rate, one-third (36.8%) of all owner-occupied households with a mortgage in Hagerstown are paying over 30% of their monthly income on housing. This is nearly 4% more than in 2018 and indicates a high percentage of owners whose housing is not considered affordable. This is nearly 4% more than in 2018. Additionally, this is a much higher rate of cost burden than in Washington County (24.6%) and the State of Maryland (26.2%). When also factoring in homeowners without a mortgage, 29.3% of Hagerstown homeowners are cost burdened, compared with 19.5% of homeowners in Washington County and 22.4% in the State of Maryland.

To determine the median list prices of homes in the City of Hagerstown, the City researched listings through Zillow Research at Zillow.com and examined data provided by Pen-Mar REALTORS. During the last Five-Year Consolidated Plan, the City also consulted

real estate ads in *At Home Places* Magazine and the *Herald-Mail* newspaper; *At Home Places* is no longer published. As of February 5, 2025, the *Herald-Mail Media* website only had one for-sale real estate ad, a two-bedroom mobile home for \$65,900.

Data provided by the Pen-Mar Regional Association of REALTORS indicates that the median sales price of homes for December 2024 in Washington County, MD was \$320,000, over \$40,000 more than the five year average sales price of \$279,376. There were 271 active listings with 123 closed sales in December 2024.

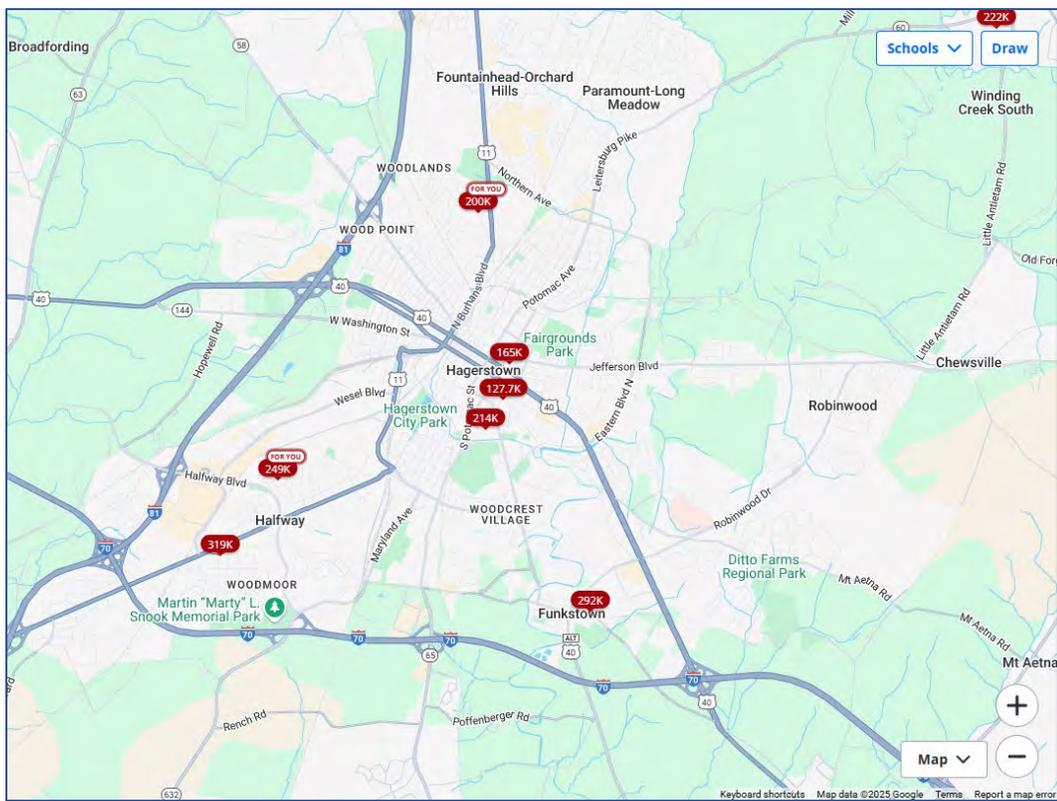
Similarly, Zillow Research estimates that the typical for-sale home value in the Hagerstown MSA was \$306,883.80, up 5.4% year-over-year. According to Zillow.com, as of February 5, 2025, there were 216 homes and properties for sale in the greater Hagerstown area (not contiguous with Washington County). The majority (142 houses, or 62.7%) were single-family detached houses. Of the remainder, 17 listings were for undeveloped residential real estate, 32 were townhomes (single-family attached housing), 5 were manufactured housing (commonly referred to as single- or double-wide mobile homes), and 20 were condominiums, apartments, or multifamily housing.



Source: [Zillow.com](https://www.zillow.com)

Foreclosures

According to Zillow.com, as of February 5, 2025, there were 8 properties in greater Hagerstown that were either in foreclosure, in pre-foreclosure, being auctioned, or that have already been foreclosed upon and are bank-owned. This is 3.7% of the total for-sale listings in the Hagerstown area (as defined by Zillow). These properties range between \$127,700 and \$318,800 (estimated), with most between \$200,000 and \$300,000. An analysis by ATTOM Data shows the 2024 Q3 nationwide average foreclosure rate as 0.02% and the statewide rate as 0.09%, so the Hagerstown area falls well above this rate. Below is a map of distressed property listings posted on Zillow:



Source: [Zillow.com](https://www.zillow.com)

Renter Costs

While the median monthly owner costs for homeowners with a mortgage only increased by 10.9% between 2018 and 2023, gross rent increased by 28.8% from \$808 to \$1,041. **Table II-16** illustrates rental rates within the City at the time of the 2014-2018 and 2019-2023 American Community Surveys.

Table II-16 – Gross Monthly Rent

Monthly Renter Cost	2014-2018 ACS		2019-2023 ACS	
	Number	Percentage	Number	Percentage
Renter-Occupied Housing Units	9,320	--	10,196	--
Less than \$500	1,859	19.9%	1,172	11.5%
\$500 to \$999	4,168	44.7%	3,520	34.5%
\$1,000 to \$1,499	2,734	29.3%	4,115	40.4%
\$1,500 to \$1,999	498	5.3%	1,152	11.3%
\$2,000 to \$2,499	44	0.5%	160	1.6%
\$2,500 to \$2,999	0	0.0%	32	0.3%
\$3,000 or more	17	0.2%	45	0.4%
No Cash Rent	297	--	254	--
Median (dollars)	\$808	--	\$1,041	--

Source: 2014-2018 and 2019-2023 ACS table DP04

HUD defines a housing cost burden as a household that pays over 30 percent or more of its monthly income on housing costs. The monthly housing costs for over half (52.1%) of all renter-occupied households exceeded 30% of monthly income in 2023, indicating a high percentage of renters whose housing is not considered affordable. This was a 6% increase from 2018. **Table II-17** illustrates the housing cost for renter-households.

Table II-17 – Gross Rent as a Percentage of Household Income

Rental Cost as a % of Income	2014-2018 ACS		2019-2023 ACS	
	Number	Percent	Number	Percent
Rental Units paying rent	9,256	--	10,078	--
Less than 15 percent	1,125	12.2%	1,342	13.3%
15 to 19.9 percent	1,313	14.2%	849	8.4%
20 to 24.9 percent	1,216	13.1%	1,241	12.3%
25 to 29.9 percent	1,157	12.5%	1,389	13.8%
30 to 34.9 percent	673	7.3%	809	8.0%
35 percent or more	3,772	40.8%	4,448	44.1%
Not computed	361	--	372	--

Source: 2014-2018 and 2019-2023 ACS table DP04



The Federal Fiscal Year 2024 and 2025 Fair Market Rents for the Hagerstown, MD HUD Metro FMR Area (consisting of Washington County, MD) are shown in **Table II-18** below.

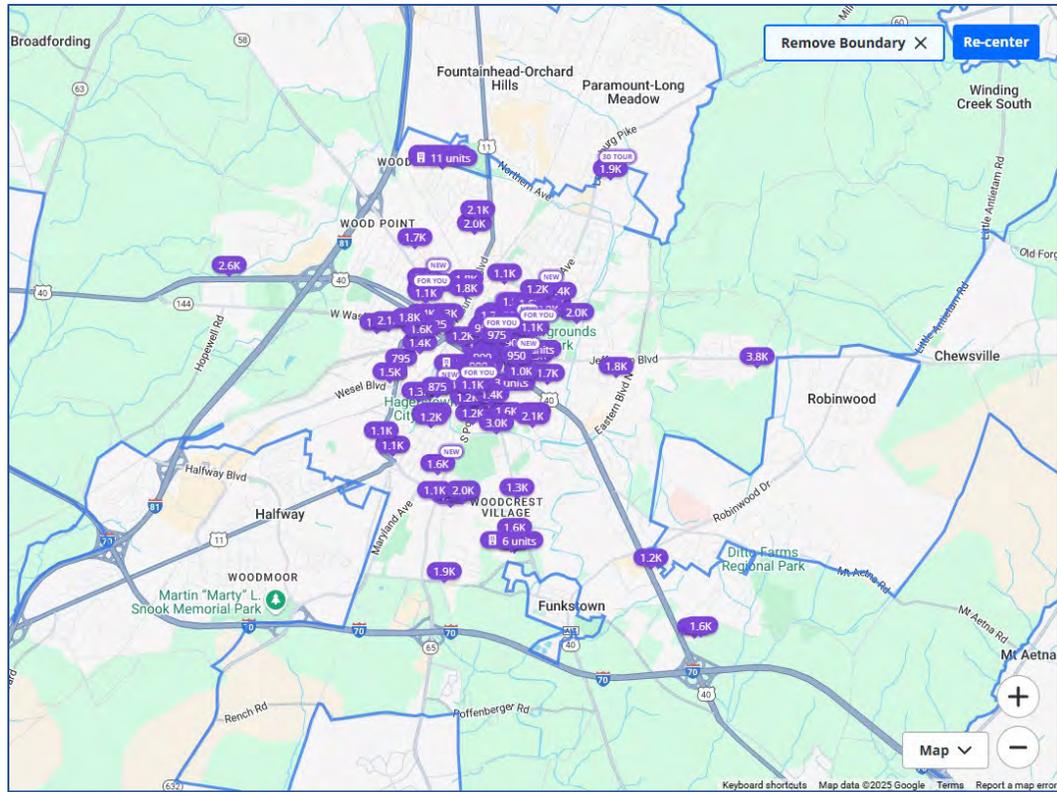
Table II-18 – FFY 2025 and 2024 Fair Market Rents by Unit Bedrooms

	Efficiency / Studio	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
FFY 2025 FMR	\$852	\$947	\$1,242	\$1,711	\$1,902
FFY 2024 FMR	\$830	\$932	\$1,225	\$1,713	\$1,889

Source: www.huduser.gov

With the exception of the FMR for three-bedroom units, most Fair Market Rents increased slightly. These are higher than the median gross rent cost as estimated by the 2019-2023 ACS, but in consultation with stakeholders, most units in 2025 are rented above the HUD FMR. This is consistent with area rental listings. According to Zillow Research, as of December 31, 2024, the typical observed market rate for rental apartments in the Hagerstown, MD MSA is \$1,538.39. This is close to \$100 more than December 2023 and over \$300 more than the HUD FFY 2024 Two-Bedroom FMR.

Rental advertisements were reviewed on Zillow.com, Craigslist.org, and the *Herald-Mail Media* website (heraldmailmedia.com) on February 5, 2025, for rental rates, availability, and Fair Housing compliance. The *Herald-Mail* only had one residential rental advertisement for units at the Park Plaza Apartments, ranging from \$900 to \$1,400 not including utilities. Zillow had 137 rental advertisements in the greater Hagerstown area (an area larger than the City of Hagerstown but smaller than Washington County). These ranged between \$750 a month for a studio apartment in Hagerstown and \$3,799/month for a five-bedroom house east of the City; the most expensive rental unit within the City was a three-bedroom apartment at \$3,000 per month. There were 725 ads for rental housing on martinsburg.craigslist.org within a 6.3-mile radius of Hagerstown, MD posted since December 23, 2024; the vast majority are duplicate ads for a handful of property management companies. The Craigslist ads ranged between \$700/month for a one-bedroom apartment and \$2,500/month for a four-bedroom house. A map of listings from Zillow.com is below:



Source: [Zillow.com](https://www.zillow.com)

In terms of fair housing issues noted in the above advertisements:

- Most rental units allow pets while reserving the right to restrict size, weight, and breed and to charge pet rent and fees. Some ads specifically prohibit certain breeds of “aggressive” dog (sometimes enumerated as Dobermans, Pit Bulls and Rottweilers). A few listings emphatically ban pets altogether, which places a burden on potential renters to prove that they have a trained Service Animal or a required Emotional Support Animal.
- None of the surveyed listings prohibited children, and many promoted nearby playgrounds and schools. Some listings did limit the number of occupants for a one-bedroom apartment, which could be problematic.
- Most advertisements did not mention a specific deposit amount, but one listing for a three-bedroom house renting for \$1,295/month required a two-month security deposit as well as a utility deposit for a total up-front cost of \$4,185.
- At least one advertisement required a minimum credit score of 650 and proof of monthly income of 2.5 times the rent (\$1,000 at that apartment), which is potentially discriminatory.

- The majority of the surveyed listings were not advertised as ADA-accessible. On Craigslist about a third of advertisements specify wheelchair access, but at least one property appears to have a front door narrower than the 32 inch minimum for wheelchair access. Only two advertisements on Zillow claim to be accessible, though a large number of other listings appear that they may be accessible.
- Only a few listings specify that they accept Section 8 or other Voucher payments, but no advertisements negatively mention keywords such as Section 8, Voucher, or HUD. Most listings did not mention government assistance at all.

The *Herald-Mail* advertisement does not mention Fair Housing or Equal Opportunity, but the property management company that placed the ad does have the Equal Opportunity logo on its website. Zillow not only has the Equal Opportunity logo and a link to the HUD Office of Fair Housing and Equal Opportunity but also features a Fair Housing Guide directed toward rental managers, giving an overview of fair housing law and guidance for rental advertisements and agreements both nationwide and on the state level. However, Zillow places the responsibility on lessors to adhere to Fair Housing law and regulations. As for Craigslist, its ads are more likely to present fair housing issues as individual landlords do not necessarily know fair housing law, though the large rental management companies often include Equal Opportunity language in their advertisements.

G. Household Types:

Based on a comparison between the 2014-2018 and 2019-2023 American Community Survey estimates, the City of Hagerstown’s population increased by 8.2%. The median income of the Hagerstown area increased by 23.3%, but per the U.S. Bureau of Labor Statistics’ CPI Inflation Calculator the adjusted purchasing power only increased by 1.0% between December 2018 and December 2023.

Table II-19 – Demographic Changes Between 2018 & 2023

Demographics	2014-2018 ACS	2019-2023 ACS	% Change
Population	40,186	43,490	8.2%
Households	15,976	18,472	15.6%
Median Household Income	\$40,531	\$49,957	23.3%

Data Source: 2014-2018 and 2019-2023 ACS tables DP02 and DP03

Table II-20 - Number of Households

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households *	4,475	3,195	3,300	1,860	5,530
Small Family Households *	1,215	1,100	1,275	705	2,220
Large Family Households *	210	230	305	245	595
Household contains at least one person 62-74 years of age	629	640	690	385	1,170
Household contains at least one person age 75 or older	475	490	430	154	365
Households with one or more children 6 years old or younger *	765	834	675	455	870

Data Source: 2017-2021 CHAS tables 5, 7, and 13

A household is considered to have a housing problem if it is cost burdened by more than 30% of its income, is experiencing overcrowding, or has incomplete kitchen or plumbing facilities. The four housing problems are: lacks complete kitchen facilities; lacks complete plumbing facilities; more than one person per room; and cost burden greater than 30%. The following tables illustrate the households that have one or more housing problems, and those that are cost burdened.



Table II-21 – Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Substandard Housing - Lacking complete plumbing or kitchen facilities	140	35	0	10	210	0	35	4	0	95
Severely Overcrowded - With >1.5 people per room (and complete kitchen and plumbing)	75	0	20	0	105	0	0	0	0	20
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	265	100	25	40	435	40	0	10	0	60
Housing cost burden greater than 50% of income (and none of the above problems)	2,145	210	0	0	2,355	250	245	40	0	535
Housing cost burden between 30-50% of income (and none of the above problems)	435	1,205	600	15	2,260	65	270	685	185	1,295
Zero/negative Income (and none of the above problems)	210	0	0	0	210	90	0	0	0	90

Data Source: 2017-2021 CHAS table 4

**Table II-22 – Households with one or more Housing Problems:
Lacks kitchen or complete plumbing, overcrowding, cost burdened**

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Having 1 or more of four housing problems	3,055	1,550	645	65	5,365	355	550	740	185	2,010
Having none of four housing problems OR household has negative income, but none of the other housing problems	960	795	1,165	605	5,745	105	300	750	1,005	5,255

Data Source: 2017-2021 CHAS table 1

Note: In the 2017-2021 CHAS data table 1, the “Household has negative income, but no other housing problems” category is now combined with the “Having none of four severe housing problems” category.

**Table II-23 – Households with one or more Severe Housing Problems:
Lacks kitchen or complete plumbing, severe overcrowding, severely cost burdened**

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
1 or more of four severe housing problems	2,625	345	45	50	3,105	290	280	55	0	710
None of four severe housing problems OR household has negative income, no other housing problems	1,390	2,005	1,765	620	8,005	170	570	1,435	1,190	6,555

Data Source: 2017-2021 CHAS table 2

Note: In the 2017-2021 CHAS data table 2, the “Household has negative income, but no other housing problems” category is now combined with the “Having none of four severe housing problems” category.

Table II-24 – Cost Burden More Than 30% and Less Than or Equal to 50% of Household Income

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Elderly Family	90	85	30	220	4	0	35	74
Small Family	210	565	325	1,104	20	135	200	445
Large Family	0	130	60	190	0	0	155	225
Elderly Non-Family	135	215	35	385	20	110	95	255
Other	255	270	150	675	20	60	210	345
Total need by income	690	1,265	600	4,439	64	305	695	1,344

Data Source: 2017-2021 CHAS table 7

Table II-25 – Cost Burden Greater Than 50% of Household Income

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Elderly Family	20	10	0	30	30	35	20	85
Small Family	660	85	0	745	10	15	10	35
Large Family	150	30	0	180	4	10	0	14
Elderly Non-Family	215	85	0	300	165	45	10	220
Other	1,275	35	0	1,310	40	140	0	180
Total need by income	2,320	245	0	2,565	249	245	40	534

Data Source: 2017-2021 CHAS table 7

Table II-26 – Overcrowding Conditions (More than 1, less than or equal to 1.5 persons/room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Single family households	220	100	25	40	395	40	0	10	0	60
Household with at least one subfamily or more than one family	0	0	0	0	0	0	0	0	0	0
Other, non-family households	45	0	0	0	0	0	0	0	0	0
Total need by income	265	100	25	40	435	40	0	10	0	60

Data Source: 2017-2021 CHAS table 10

Table II-26 – Severe Overcrowding Conditions (More than 1.5 persons per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Single family households	15	0	20	0	35	0	0	0	0	20
Household with at least one subfamily or more than one family	0	0	0	0	0	0	0	0	0	0
Other, non-family households	60	0	0	0	70	0	0	0	0	0
Total need by income	75	0	20	0	95	0	0	0	0	20

Data Source: 2017-2021 CHAS table 10

According to the 2019-2023 American Community Survey (ACS), there were 18,472 households in the City of Hagerstown. Of these, 7,133 (38.6% of total households) were single person households living alone, and single person households aged 65 and over comprised 1,589 households (12.7% of total households). It is presumed that as these seniors age in place, additional accommodation and special care needs will be necessary for this portion of the City’s population. The City will need to assist in obtaining funding and working with housing service and elderly support agencies to provide programs, activities, and accommodations for its elderly population. Of householders over the age 65 and living alone, the majority are female (1,443) compared to male (909).

Disabled Population:

Based on the 2019-2023 ACS data, a total of 8,874 residents (20.7% of the population) have a disability. Of the City's total population, 4.0% of residents have a hearing difficulty, 3.5% have a vision difficulty, 11.8% have a cognitive difficulty, 10.6% have an ambulatory difficulty, 3.9% have a self-care difficulty, and 9.4% have an independent living difficulty. Residents may have more than one disability (e.g. a person with a cognitive difficulty may also have a self-care difficulty) so these percentages are not cumulative.

In consultations, interviews and surveys, the lack of decent, safe, sound, sanitary, and affordable accessible housing for people with disabilities is an unmet housing need and problem. There are housing developments being constructed in and around Hagerstown that will include some accessible housing, but the majority of new and rehabilitated housing is aimed at "market rate" consumers rather than low-income householders. There is the potential for rehabilitating housing in and around the City's core, but this housing as a rule is not in accessible buildings and creating ADA access would dramatically raise costs.

The elderly and disabled populations are greatly affected by the high cost and low availability of housing in the City of Hagerstown. Many of the City's elderly and disabled residents have fixed or limited incomes. For homeowners, the rising cost of goods and services can make basic home repairs unaffordable, let alone sufficient weatherization improvements. Higher utility costs put elderly and disabled homeowners at risk of terminations and issues with creditors. Meanwhile, renters in the City face much higher rental rates than even five years ago, and increased demand is forcing those on fixed and limited incomes into less accessible, less safe, and less affordable housing that is often not code compliant. Social service agencies report a large rise in the number of elderly persons accessing food banks or hot meals to reduce food costs.

Victims of Domestic Violence, Dating Violence, Sexual Assault, and Stalking:

The Maryland Governor's Office of Crime Prevention and Policy tracks different types of crime committed at the County, Municipal, and State levels. This is provided by the Maryland Department of State Police's Central Records Division. In the year 2023 in the City of Hagerstown, there were 197 aggravated assaults, 28 rapes, and 4 murders.

In 2024 in Washington County, the Maryland State Police reported 88 sex offenses with 89 victims; of these, only 6 were cleared. There were also six kidnappings/abductions, all of which were cleared, and one human trafficking offense which remains uncleared.

All victims of domestic violence who interact with the Hagerstown Police Department are given a pamphlet of information for CASA, Inc. A member of the Continuum of Care, CASA is a domestic violence shelter that serves Washington County, MD. CASA’s services include individual counseling, support groups, abuser intervention, legal services, temporary emergency shelter, career advisement, a 24-hour hotline, and monthly workshops that deal with issues such as legal rights, self-esteem, job readiness, nutrition, and parenting skills.

According to their 2024 Annual Report, CASA served 691 survivors of domestic violence (DV), 109 survivors of sexual assault and/or abuse (SA), 67 dual DV and SA survivors, and 24 sex trafficking victims. Out of an estimated County population of 155,033, one out of every 205 persons has requested help from CASA for domestic violence and one out of every 881 persons has requested help for sexual assault or abuse; however, domestic violence and sexual assault tends to be underreported compared to other criminal activity. In terms of services provided, CASA assisted in 217 Medical Accompaniment calls (for forensic testing), 9,875 total shelter nights provided to survivors, 67 Final Protective Orders, and 23 safe stays for survivors’ pets.

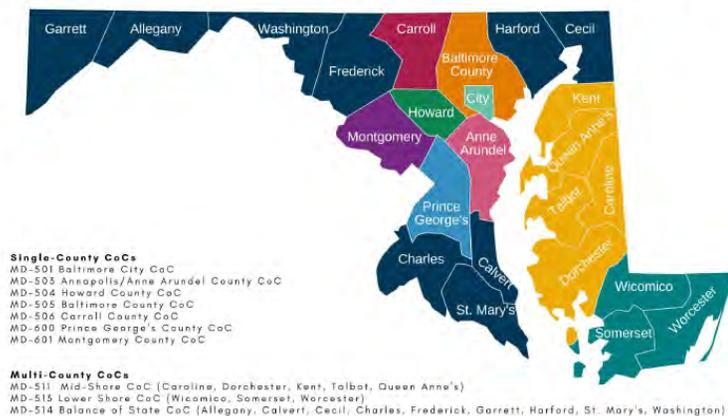
CASA, Inc is an active member of the Washington County Anti-Human Trafficking Collaborative. This collaborative focuses on raising community awareness of the signs of Human Trafficking and resources available for survivors.

Homelessness:

Homeless persons and persons at risk of becoming homeless, including victims of domestic violence, are significantly affected by the availability and affordability of housing.

The State of Maryland has ten (10) active Continuum of Care (CoC) Regions. The MD-514 Maryland Balance of State Continuum of Care serves nine counties in western, southern, and northern Maryland, including Washington County and the City of Hagerstown. The Balance of State assumed the duties of the former MD-512 Hagerstown/Washington County CoC after the

MARYLAND CONTINUUMS OF CARE



year 2020. The Washington County Community Action Council (WCCAC) is the county representative to the Balance of State CoC. The WCCAC offers various services to help meet the basic needs of low-to-moderate-income persons. This assistance includes crisis assistance, information and referral, energy programs, monthly food pantry, housing assistance programs, housing counseling, property assistance programs, and transportation assistance. Additionally, WCCAC manages 39 units of rental housing and has partnered with Habitat for Humanity Washington County to provide owner-occupied housing at 0% interest rates. Finally, WCCAC offers 7 youth (age 18-24) Rapid Rehousing beds as well as 1 family unit with 3 family beds and 6 adult-only Rapid Rehousing beds.

According to the MD-514 Point-in-Time count conducted on the night of January 24, 2024, 229 people were experiencing homelessness in Washington County. This is a 17% increase since 2023. Of them, 68 (30%) were unsheltered, 170 (55%) were in emergency shelter, and 36 (16%) were in transitional housing. In terms of demographics:

- 151 (66%) were men, 76 (33%) were women, and two people had different gender identities;
- 135 (59%) were White only and 68 (30%) were Black/African American only, with 11 (5%) being Hispanic/Latino (any race) and 12 (5%) being multi-racial;
- 20 (9%) were members of homeless families;
- 42 (18%) were chronically homeless;
- 20 (9%) were veterans;
- 10 (4%) were seniors age 65 and over; and
- 38 (17%) were youth age 24 and under, of which 30 (13% of the overall total) were children under age 18.

Individuals experiencing homelessness often face higher rates of substance abuse and mental illness, which may be both caused by and causes of homelessness. Their symptoms often worsen as the ability to cope with their surroundings becomes strained. For the entire MD-514 Balance of State CoC, the 2024 PIT count identified a total of 238 persons (20.0% of the total 1,188 homeless persons in the CoC) who were severely mentally ill and 154 persons (13.0% of the total) with chronic substance abuse. The CoC did not publish county-level data for homeless persons with severe mental illness or chronic substance abuse.

The 2024 MD-514 Housing Inventory Count conducted on January 24, 2024, identified the following types of shelter beds available in Washington County:

- 192 Emergency Shelter beds, 125 occupied

- 45 Transitional Housing beds, 36 occupied
- 25 Rapid Rehousing beds, 25 occupied
- 143 Permanent Supportive Housing beds, 128 occupied
- **Total: 405 beds, 314 occupied**

Sheppard Pratt, Inc. operates the Homeless Outreach Program (HOP). HOP is a walk-in service to assist individuals through crisis intervention, employment support, housing assistance, psychosocial support, referrals for healthcare and mental health services, and substance abuse support. Many of Sheppard Pratt's services target veterans, such as the Operation New Start program which supports homeless veterans with services such as transitional housing and employment training and placement. Sheppard Pratt's North Point Veterans Program is a clinically intensive transitional housing program for homeless male veterans with a mental health and/or substance use disorder. Its North Point facility provides 25 adult-only transitional housing beds. All 25 are designated as Veteran beds. Veterans can receive services for up to 24 months and become reestablished in the community through employment support, financial counseling, support for mental illness and substance abuse, life skills training, help with securing VA benefits, and other recovery-oriented services. The organization's Supportive Services for Veteran Families (SSVF) program, funded by the US Department of Veterans Affairs, helps veterans and their families secure permanent housing. It provides 40 Rapid Rehousing beds, divided into 12 adult-only beds and 7 family units with a total of 28 beds. Finally, their Homeless Veteran Reintegration Program (HVRP) helps veterans to get meaningful employment through industry-recognized certification programs, training, job placement, and other resources that address underlying barriers to employment.

Hagerstown Rescue Mission operates an emergency shelter with 41 beds. Of these, 31 are intended for families and 10 are adult-only beds. They also offer 20 beds of adult-only transitional housing.

The Hagerstown Housing Authority administers 59 Veterans Administration Supportive Housing (VASH) vouchers for providing permanent supportive housing for Veterans. Additionally, the Housing Authority of Washington County administers another 10 VASH vouchers for persons who choose to live outside of the City of Hagerstown proper.

Potomac Community Services (PCS) provides a wide range of services that include a Housing Program to help homeless individuals and families in Washington County secure permanent supportive housing and improve their employment and life skills. Individuals receiving services are encouraged to take an active role in mental health and/or substance abuse treatment to foster a healthier lifestyle and stay on track. PCS operates

two family unit homes with a total of 7 beds for chronically homeless individuals. PCS Adult Services also oversees two group homes with 26 beds that provide round-the-clock supervision for adult residents with chronic, severe mental illness that keeps them from living independently. The primary purpose is to ensure safety and maintain community living versus institutional living (or entering homelessness). Finally, Adult Services works closely with the Day Reporting Center treatment team, Sheriff's Department, and Washington County Detention Center to provide collaborative case management for adults who are currently justice-involved and working toward sobriety, employment, and long-term success during and after justice involvement.

REACH of Washington County is a nonprofit, faith-based organization serving Washington County since 1990. It is part of a network of local service providers and local congregations that assists low-income impoverished families and individuals during times of financial crisis. Reach offers many services in the homeless community: Bridge to Change gives homeless persons a stipend for clearing trash and teaches them financial literacy; Case Management matches clients with appropriate social services and places them in permanent housing (with a 45 day waiting period and a 94% rate of continued housing stability); Crisis Services offers encouragement, advice, referrals, and financial assistance to prevent homelessness, as well as assistance in securing identification documents and prescriptions; their Day Resource Center offers drop-in services for unhoused individuals to escape from the weather while they use the phone, check their mail, use the restroom, and get hygiene supplies; and, their Financial Education Partnership-Washington County provide budgeting and financial training for a broad spectrum of clients including the unemployed, individuals in recovery, homeless persons, and low-mod households. Reach operates a Cold Weather Shelter from the last Sunday in October through the first Sunday in April, from 7pm to 7am. The shelter is intended for adults age 18 and over who have the ability to care for themselves and are not at risk to themselves or others. The maximum bed capacity is 42 (30 men, and 12 women) with six overflow beds when the temperature will be below freezing. Reach also offers 3 adult-only Rapid Rehousing beds.

As of the 2022-2023 school year (the most recent nationally reported data), there were 833 homeless students enrolled in Washington County Public Schools. Demographics of homeless students are below:

- 346 (42%) were White, 201 (24%) were Black or African American, 144 (17%) were Hispanic or Latino of any race, and 138 (17%) were of Two or More races.
- 138 (17%) had one or more disabilities as defined by the Individuals with Disabilities Education Act (IDEA) and 94 (11%) were English Language Learners.

- 235 (28%) were unaccompanied youth.
- 682 (82%) were “doubled up” living temporarily with friends or family, 118 (14%) were living in hotels or motels, 23 (3%) were living in shelters or transitional housing, and 10 (1%) were unsheltered.
- In the 2022-2023 school year, 57 homeless students graduated within four years of high school (greater than or equal to 90% of all homeless students on the four-year high school track).

Additionally, 3,482 children ages 5-17 were reported as living in poverty and 108 students were in foster care.

The consequences of unaccompanied youth and homelessness are vast. Youth experiencing homelessness are more likely to have mental health problems and challenges, substance abuse disorders, unplanned and unsupported pregnancy, and criminal activity and victimization. These are all direct and indirect barriers to obtaining education, employment, and housing as they enter adulthood.

Specific needs of the extremely low-income who are housed but are at imminent risk of becoming unsheltered or living in shelters are: food, transportation and job training, including soft skills. Immediate needs are emergency rent, mortgage, and utility assistance for households that will become homeless if they are unable to pay their rent/mortgage and utility bills. Some local social service agencies provide food and clothing through food pantries and soup kitchens while others have provided short-term rental assistance and down payment assistance, but funds for direct assistance are increasingly scarce and inadequate to meet rising housing costs. Job training programs are available, but transportation and childcare are both barriers. A frequently mentioned issue is the assistance ceiling, wherein a person on assistance is unable to exceed that ceiling without losing access to housing and food benefits such as Section 8 vouchers or SNAP/EBT; this discourages people from entering the workforce full-time unless their job can pay for all of their expenses without assistance.

The high cost of decent, safe, sound, and sanitary housing in the City creates housing instability for low- and moderate-income families in the area. According to the 2019-2023 ACS data, over half (56.6%) of the City’s housing stock consists of renter occupied units and over half (52.1%) of renting families pay more than 30% of their income on rent. According to stakeholder meetings and survey participants, there is a general lack of decent, safe, sound, sanitary and affordable housing. Residents who are able to secure housing are hesitant to report fair housing or property maintenance concerns and violations due to fear of retaliation, evictions, and rent hikes.



Social service agencies and organizations in Washington County maintain records in the Homeless Management Information System (HMIS) and continue to monitor and track assisted households following their exit from homelessness.

H. Cost Burden:

The City of Hagerstown lacks affordable housing, especially decent, safe, sound, and sanitary housing. Many of the City’s lower income households are paying more than 30% of their total household income on the monthly cost for housing. The following table describes the demographics of cost-burdened households in the City of Hagerstown:

Table II-27 – Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)	Jurisdiction as a whole
Jurisdiction as a whole	11,049	3,909	3,109	295	18,370
White	8,195	2,335	2,120	195	12,845
Black / African American	1,525	1,075	615	35	3,245
Asian	170	85	25	-	280
American Indian, Alaska Native	4	4	4	-	14
Pacific Islander	-	-	-	-	-
Hispanic	585	365	95	65	1,115
Other / Multiple races	570	45	250	-	870

Data Source: 2017-2021 CHAS table 9

According to the 2017-2021 CHAS Data, of the City of Hagerstown’s 18,370 households there were 3,909 (21.3%) which were cost burdened by 30 to 50% and 3,109 (16.9%) which were severely cost-burdened by greater than 50%; 7,018 households (38.2%) in Hagerstown are cost burdened by 30% or more of household income. By demographic:

- White households: 18.2% are cost burdened by 30-50%, 16.5% are severely cost-burdened by greater than 50%
- Black/African American households: 33.1% are cost burdened by 30-50%, 19.0% are severely cost-burdened by greater than 50%
- Asian households: 30.4% are cost burdened by 30-50%, 8.9% are severely cost-burdened by greater than 50%
- Hispanic households: 32.7% are cost burdened by 30-50%, 8.5% are severely cost-burdened by greater than 50%
- Other/multiple race households: 16.7% are cost burdened by 30-50%, 28.7% are severely cost-burdened by greater than 50%.

Non-White households tend to have a higher rate of cost burden and severe cost burden than the City’s average cost burden, especially Black and Other Race households.

I. Housing Problems:

A household is considered to have a housing problem if it lacks complete kitchen facilities, lacks complete plumbing facilities, has more than one person per room, or has a cost burden greater than 30% of household income.

According to the 2017-2021 American Community Survey (from which the 2017-2021 CHAS data is derived), there are 18,472 total households in the City of Hagerstown. Of these, there are 12,583 (68.1%) White households, 3,837 (20.8%) Black/African American households, 276 (1.5%) Asian households, 13 (0.0%) American Indian or Alaska Native households, 375 (2.0%) Some Other Race households, and 1,388 (7.5%) Two or More Races households. Hispanic or Latino households of all races comprised 1,281 (6.9%) of all households. No Pacific Islander households were reported in the 2017-2021 ACS. During the planning process for the preparation of the City of Hagerstown’s Five-Year Consolidated Plan, an evaluation and comparison was made to determine the needs of the racial/ethnic groups in comparison to the overall need in the City. Disproportionate need is defined as a group having at least 10 percentage points higher than the percentage of persons as a whole with that same need.

The following tables illustrate the disproportionate needs in the City of Hagerstown.

Table II-28 – 0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems OR Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,410	1,065
White	2,160	755
Black / African American	810	140
Asian	55	0
American Indian, Alaska Native	4	0
Pacific Islander	0	0
Hispanic	140	145

Data Source: 2017-2021 CHAS table 1

In the 0-30% AMI range, 3,410 (76.2%) of 4,475 residents have one or more of the four housing problems. Asian and American Indian/Alaska Native households are both disproportionately affected, with 100% of both groups having one or more of the four housing problems.

Table II-29 – 30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems OR Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,100	1,095
White	1,440	740
Black / African American	435	200
Asian	55	0
American Indian, Alaska Native	4	4
Pacific Islander	0	0
Hispanic	115	50

Data Source: 2017-2021 CHAS table 1

In the 30-50% AMI range, 2,100 (65.7%) of 3,195 residents have one or more of the four housing problems. Asian households are disproportionately affected, with 100% having one or more of the four housing problems.

Table II-30 – 50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems OR Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,385	1,915
White	670	1,530
Black / African American	470	220
Asian	0	10
American Indian, Alaska Native	0	0
Pacific Islander	0	0
Hispanic	220	65

Data Source: 2017-2021 CHAS table 1

In the 50-80% AMI range, 1,385 (42.0%) of 3,300 residents have one or more of the four housing problems. Black/African American and Hispanic households are both disproportionately affected, with 68.1% of Black/African American households having one or more of the four housing problems and 77.2% of Hispanic households having one or more of the four housing problems.

Table II-31 – 80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems OR Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	250	1,610
White	175	1,220
Black / African American	0	175
Asian	0	25
American Indian, Alaska Native	0	0
Pacific Islander	0	0
Hispanic	44	75

Data Source: 2017-2021 CHAS table 1

In the 80-100% AMI range, 250 (13.4%) of 1,860 residents have one or more of the four housing problems. Hispanic households are disproportionately affected, with 37.0% having one or more of the four housing problems.

Table II-32 – Greater than 100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems OR Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	220	5,310
White	170	3,990
Black / African American	14	775
Asian	35	100
American Indian, Alaska Native	0	0
Pacific Islander	0	0
Hispanic	0	260

Data Source: 2017-2021 CHAS table 1

In the Greater than 100% AMI range, 220 (4.0%) of 5,530 residents have one or more of the four housing problems. Asian households are disproportionately affected, with 25.9% having one or more of the four housing problems.

The City's Asian households are disproportionately affected in the low and high AMI ranges, while in moderate- and medium-income ranges Black/African American and Hispanic households are disproportionately affected.

J. Disproportionately Greater Need: Severe Housing Problems:

A household is considered to have a severe housing problem if it lacks complete kitchen facilities, lacks complete plumbing facilities, has more than 1.5 persons per room, or is cost burdened by over 50% of household income.

According to the 2017-2021 American Community Survey (from which the 2017-2021 CHAS data is derived), there are 18,472 total households in the City of Hagerstown. Of these, there are 12,583 (68.1%) White households, 3,837 (20.8%) Black/African American households, 276 (1.5%) Asian households, 13 (0.0%) American Indian or Alaska Native households, 375 (2.0%) Some Other Race households, and 1,388 (7.5%) Two or More Races households. Hispanic or Latino households of all races comprised 1,281 (6.9%) of all households. No Pacific Islander households were reported in the 2017-2021 ACS. During the planning process for the preparation of the City of Hagerstown’s Five-Year Consolidated Plan, an evaluation and comparison was made to determine the needs of the racial/ethnic groups in comparison to the overall need in the City. Disproportionate need is defined as a group having at least 10 percentage points higher than the percentage of persons as a whole with that same need.

The following tables illustrate the disproportionate needs of the City of Hagerstown.

Table II-33– 0%-30% of Area Median Income

Severe Housing Problems	Has one or more of four severe housing problems	Has none of the four severe housing problems OR Household has no/negative income, but none of the other severe housing problems
Jurisdiction as a whole	2,915	1,460
White	1,820	1,095
Black / African American	755	190
Asian	25	35
American Indian, Alaska Native	4	0
Pacific Islander	0	0
Hispanic	70	210

Data Source: 2017-2021 CHAS table 2

In the 0-30% AMI range, 2,915 (66.6%) of 4,375 residents have one or more of the four severe housing problems. Black/African American and American Indian & Alaska Native households are disproportionately affected, with 79.9% of Black/African American

households having one or more of the four housing problems and 100% of American Indian & Alaska Native households having one or more of the four housing problems.

Table II-34 – 30%-50% of Area Median Income

Severe Housing Problems	Has one or more of four severe housing problems	Has none of the four severe housing problems OR Household has no/negative income, but none of the other severe housing problems
Jurisdiction as a whole	625	2,575
White	455	1,725
Black / African American	80	560
Asian	0	55
American Indian, Alaska Native	0	8
Pacific Islander	0	0
Hispanic	70	95

Data Source: 2017-2021 CHAS table 2

In the 30-50% AMI range, 625 (19.5%) of 3,200 residents have one or more of the four severe housing problems. Hispanic households are disproportionately affected, with 42.4% having one or more of the four severe housing problems.

Table II-35 – 50%-80% of Area Median Income

Severe Housing Problems	Has one or more of four severe housing problems	Has none of the four severe housing problems OR Household has no/negative income, but none of the other severe housing problems
Jurisdiction as a whole	100	3,200
White	65	2,125
Black / African American	4	685
Asian	0	10
American Indian, Alaska Native	0	0
Pacific Islander	0	0
Hispanic	20	260

Data Source: 2017-2021 CHAS table 2

In the 50-80% AMI range, 100 (3.0%) of 3,300 residents have one or more of the four severe housing problems. There are no disproportionately affected demographics.

Table II-36 – 80%-100% of Area Median Income

Severe Housing Problems	Has one or more of four severe housing problems	Has none of the four severe housing problems OR Household has no/negative income, but none of the other severe housing problems
Jurisdiction as a whole	50	1,710
White	10	1,385
Black / African American	0	175
Asian	0	25
American Indian, Alaska Native	0	0
Pacific Islander	0	0
Hispanic	4	115

Data Source: 2017-2021 CHAS table 2

In the 80-100% AMI range, 50 (2.8%) of 1,760 residents have one or more of the four severe housing problems. There are no disproportionately affected demographics.

Table II-37 – Greater than 100% of Area Median Income

Severe Housing Problems	Has one or more of four severe housing problems	Has none of the four severe housing problems OR Household has no/negative income, but none of the other severe housing problems
Jurisdiction as a whole	125	5,415
White	40	4,080
Black / African American	10	785
Asian	35	100
American Indian, Alaska Native	0	0
Pacific Islander	0	0
Hispanic	0	260

Data Source: 2017-2021 CHAS table 2

In the Greater than 100% AMI range, 125 (2.3%) of 5,440 residents have one or more of the four severe housing problems. Asian households are disproportionately affected, with 25.9% having one or more of the four severe housing problems.

The City’s Black/African American households are disproportionately affected in the extremely low AMI range, Hispanic households are disproportionately affected in the low AMI range, and Asian households are disproportionately affected in the high AMI range.

K. Disabled Households:

Table II-33 shows the number of disabled individuals in the City of Hagerstown. 20.7% (8,874 persons) of Hagerstown’s 42,795 civilian population are disabled. This is over one percent greater than in 2018 and almost ten percent higher than statewide. There is a need for affordable, accessible housing, who often have a fixed income and cannot afford the ballooning increases in the rental market around Hagerstown.

Table II-32 – Disability Status for Residents in Hagerstown, MD

Disability Status of the Civilian Non-Institutional Population	2014-2018 ACS		2019-2023 ACS	
	#	%	#	%
Total Civilian Population	39,534	--	42,795	--
Total Population with a disability	7,682	19.4%	8,874	20.7%
Total population under 5 years	2,947	--	3,422	--
With a hearing difficulty	0	--	0	--
With a vision difficulty	0	--	0	--
Total population 5 to 17 years	7,853	--	7,574	--
With a hearing difficulty	81	1.0%	39	0.5%
With a vision difficulty	175	2.2%	0	--
With a cognitive difficulty*	731	9.3%	983	13.0%
With an ambulatory difficulty*	50	0.6%	113	1.5%
With a self-care difficulty*	65	0.8%	168	2.2%
Total population 18 to 34 years	9,425	--	9,726	--
With a hearing difficulty	128	1.4%	67	0.7%
With a vision difficulty	186	2.0%	445	4.6%
With a cognitive difficulty	867	9.2%	1,016	10.4%
With an ambulatory difficulty	367	3.9%	226	2.3%
With a self-care difficulty	196	2.1%	30	0.3%
With an independent living difficulty**	592	6.3%	711	7.3%
Total population 35 to 64 years	14,919	--	16,207	--
With a hearing difficulty	614	4.1%	777	4.8%
With a vision difficulty	752	5.0%	383	2.4%
With a cognitive difficulty	1,355	9.1%	1,968	12.1%



With an ambulatory difficulty	2,078	13.9%	2,167	13.4%
With a self-care difficulty	459	3.1%	674	4.2%
With an independent living difficulty	989	6.6%	1,292	8.0%
Total population 65 to 74 years	2,471	--	3,508	--
With a hearing difficulty	261	10.6%	225	6.4%
With a vision difficulty	117	4.7%	295	8.4%
With a cognitive difficulty	181	7.3%	348	9.9%
With an ambulatory difficulty	618	25.0%	836	23.8%
With a self-care difficulty	105	4.2%	309	8.8%
With an independent living difficulty	228	9.2%	392	11.2%
Total population 75 years and over	1,919	--	2,358	--
With a hearing difficulty	463	24.1%	601	25.5%
With a vision difficulty	263	13.7%	221	9.4%
With a cognitive difficulty	344	17.9%	341	14.5%
With an ambulatory difficulty	753	39.2%	814	34.5%
With a self-care difficulty	303	15.8%	342	14.5%
With an independent living difficulty	589	30.7%	595	25.2%
Sex				
Male with a disability	3,865	20.3%	4,122	19.7%
Female with a disability	3,817	18.6%	4,752	21.8%
Race with a disability				
White alone	6,009	21.5%	5,787	22.3%
Black or African American alone	1,087	16.2%	1,980	20.1%
American Indian and Alaska Native alone	0	--	13	86.7%
Asian alone	172	15.0%	95	16.5%
Native Hawaiian / Other Pacific Islander alone	0	--	0	--
Some other race alone	89	11.0%	100	8.5%
Two or more races	325	12.1%	899	17.4%
White alone, not Hispanic or Latino	5,823	22.4%	5,445	22.2%
Hispanic or Latino (of any race)	421	12.5%	893	19.4%

Source: 2014-2018 and 2019-2023 ACS table S1810

*Cognitive, ambulatory, and self-care difficulty data is not collected for persons under 5 years.

**Independent living difficulty data is not collected for persons under 18 years.

Of the population age 65 and older, 40.6% have a disability. Of the total population, during the last five years women have overtaken men to have a higher rate of disabilities (21.8% versus 19.7%, respectively). Ignoring the outlier American Indian and Alaska Native group (whose sample size is extremely small), White persons are two percent more likely to be disabled than other racial or ethnic groups. The disparity likely relates to the different median ages of each demographic: the median age of White persons in Hagerstown is 42.6 years, over ten years higher than the next closest median age per racial or ethnic category (Black or African American, at 32.4 years).

The disparities between individuals who have a disability and those who do not is also apparent in employment statistics. According to the 2019-2023 American Community Survey table C18120, there are 25,933 civilian noninstitutionalized persons in Hagerstown between the age of 18 and 64. Of this group, 19,419 are in the labor force and 6,514 are not in the labor force; within the labor force, 17,790 persons are employed and 1,629 are not. Disabled persons comprise only 11.0% (1,962 persons) of the employed labor force but make up 28.4% (463 persons) of the unemployed labor force and a full 43.4% (2,829) of persons not in the labor force. Of the 4,921 disabled civilian noninstitutionalized persons in the City, 60.1% (2,959 persons) are unemployed or not in the labor force at all.

III. Review/Update to Original Plan

The previous “Analysis of Impediments to Fair Housing Choice” was prepared by the City of Hagerstown in 2020. The following restates the previously identified impediments from 2020 and summarizes the progress made on each.

Impediment 1: Fair Housing Education and Outreach

There is a need to educate persons about their rights under the Fair Housing Act and to raise community awareness to affirmatively further fair housing choice, especially for low-income residents, minorities and the people with disabilities who fear retaliation if they lodge a complaint.

Goal: The public in general and local officials will become knowledgeable and aware of the Fair Housing Act, related laws, regulations, and requirements to affirmatively further fair housing in the City.

Strategies: In order to reach this goal, the following activities and strategies should be undertaken:

- **1-A:** Create and support a local Fair Housing Commission or similar entity to handle fair housing complaints and promote fair housing in the City of Hagerstown.
- **1-B:** Distribute literature and informational material concerning fair housing issues, an individual’s housing rights, and landlord’s responsibilities to affirmatively further fair housing.
- **1-C:** Work with the local Board of Realtors to provide information and education on fair housing choice and additional ways to promote fair housing in the City.
- **1-D:** Promote Fair Housing awareness through the media, seminars, partnerships with local fair housing organizations, and training opportunities to provide educational opportunities for all persons to learn more about their rights under the Fair Housing Act and Americans with Disabilities Act.

Accomplishments:

- The City’s DCED programs related to housing repair funding and homeownership assistance funding all contain appropriate fair housing disclosures on the programs signature page, *“The City of Hagerstown does business in accordance with the Federal Fair Housing Act which prohibits the discrimination in the sale,*

rental, and financing of dwellings, and in other housing-related transactions based on race, color, national origin, religion, sex, familial status, and mental or physical disability. The City of Hagerstown fully supports the principals of Equal Opportunity for all and requires all program participants, loan recipients, developers, contractors, and subcontractors to comply with all applicable law.”

- HUD Fair Housing Brochures are available for customers at the City’s DCED office and Planning and Code Administration Office.
- The City of Hagerstown’s Planning and Code Administration Office includes Fair Housing educational materials in its outreach efforts.

Impediment 2: Need for Decent, Safe, Sound, Sanitary and Affordable Housing Options

There are over 20,000 applicants on the wait list for public housing including Gateway Crossing, Low rent Elderly Housing, Low rent Family Housing, and Housing Choice Vouchers. The City of Hagerstown does not have a sufficient supply of housing options that are decent, safe, sound, sanitary, and affordable.

Goal: The supply of affordable housing options that are decent, safe, sound and sanitary will meet the needs of all households throughout the City of Hagerstown, through new construction and in-fill housing, the rehabilitation of existing occupied structures and vacant buildings, and the development of mixed-income buildings.

Strategies: In order to reach this goal, the following activities and strategies should be undertaken:

- **2-A:** Support and encourage both private developers and non-profit housing providers to develop and construct new affordable mixed and middle-income rental housing that would be located throughout the City of Hagerstown.
- **2-B:** Support and encourage the rehabilitation of existing housing units in the City to create decent, safe, sound, and sanitary rental housing that is affordable to lower income households.
- **2-C:** Continue to promote the Homeownership Program and Down Payment Assistance Program to eligible first-time homebuyers.
- **2-D:** Promote and support the Façade Improvement Program and Home Rehabilitation Programs to eligible residents.

Accomplishments:

- Based on CDBG funding availability and user applications in a given budget year,

the City offers grants for emergency repairs to low-and-moderate income homeowners, grants to elderly low-and-moderate income homeowners to make needed repairs, single family low-and-moderate income homeowner rehabilitation loans, and rehabilitation costs associated with the city's homeownership program which purchases homes to rehab and sell to low- and moderate-income homeowners.

- The City of Hagerstown continues to carry out the Rental Licensing Program per the Rental Facilities Ordinance. The Rental Licensing Program is designed to promote safety, health, and habitability in rental housing and to encourage responsible management and operation of rental facilities and support property values, including those of neighboring properties.
- The City documented the need for de-concentration of poverty in its Five-Year Consolidated Plan.
- Homeownership Grant Program – Additional funding to existing program that provides down payment/rehab grants of \$7,500 City Wide. This program is available to all homebuyers within the City and has no income restrictions but does require that the homebuyer maintains the property as their primary residence for five years.

Impediment 3: Need for Senior Housing Communities and accessibility improvements for the elderly and persons with disabilities.

Single person households aged 65 and over comprised 1,589 households, or 29.8% of all single person households and waitlists for accessible housing range from 5 to 10 years. Senior only community housing and opportunities to age in place was a need continually mentioned in consultations and in surveys completed by residents. Additional accommodations and special care needs will be necessary for this portion of the City's population.

Goal: Increase the number of accessible Senior housing units through new construction and rehabilitation of existing housing units.

Strategies: In order to reach this goal, the following activities and strategies should be undertaken:

- **3-A:** Support and encourage both private developers and non-profit housing providers to develop and construct new affordable Senior rental housing.

- **3-B:** Promote programs and services to increase the amount of accessible housing through the rehabilitation and improvement to the existing housing stock by homeowners and landlords by making accessibility improvements.
- **3-C:** Promote programs to assist elderly homeowners in the City to make accessibility improvements to their properties in order for these residents to age in place by remaining in their homes.
- **3-D:** Support and encourage program development within Senior housing developments to create a sense of community and belonging.

Accomplishments:

- Based on CDBG funding availability in a given budget year, the City provides funding to a local sub-recipient (Hagerstown Neighborhood Development Partnership or HNDP) in order to provide deferred loans for down payment and closing cost assistance. Homebuyers using this funding program must be low- and moderate-income. Over the last 5 years, \$70,000 in down payment assistance funding has assisted 20 low/moderate income households achieve homeownership.
- When funding is available, CDBG funds are used by the City to acquire vacant/substandard properties to be rehabilitated and resold to low/moderate income homeowners. During the past 5 years, approximately \$708,000 has been expended for property acquisitions and rehabilitation of low/moderate income homeownership properties.
- The City also provides local operational funding support to the aforementioned sub-recipient HNDP. HNDP provides homeowner counseling and education to assist homebuyers achieve the dream of homeownership.
- The City is continuing its “Tax Sale Property Repurpose” program to obtain ownership of abandoned tax sale properties and resell properties through the Competitive Negotiated Sale Process, whose goal is to return properties to the private sector for their highest and best use which may include housing.
- The City of Hagerstown also provides local funding for the “Invest Hagerstown Homeownership Initiative” which offers down payment and closing cost loan-to-grants of up to \$7,500 to purchase owner-occupied homes in Hagerstown. Although this program does not have income restrictions, it can be utilized by low- and moderate-income homeowners. Since FFY 2020, approximately \$1,059,585 has been expended through this program and 142 homeowners have been assisted.

Impediment 4: Need for Accessibility Improvements for seniors and persons with disabilities

Waitlists for accessible units range anywhere between 5 to 10 years.

Goal: Increase the number of accessible housing units through new construction and rehabilitation of existing owner and renter units occupied by seniors, and persons with disabilities.

Strategies: In order to reach this goal, the following activities and strategies should be undertaken:

- **4-A:** Promote programs to assist elderly homeowners in the City to make accessibility improvements to their properties in order for these residents to age in place by remaining in their homes.

Accomplishments:

- The City's Planning and Code Department follows the Maryland Accessibility Code requirements for development of accessible units.
- Based on CDBG funding availability in a given budget year, the City provides funding to the Washington County Commission on Aging for the "Home Repair Grants for Seniors" program. This program assists elderly homeowners within Hagerstown city limits with necessary maintenance and repairs. This assistance enables clients to continue living in their own homes since many elderly homeowners are financially or physically unable to assume responsibility for repairs or maintenance.
- The City's DCED offers CDBG loans and grant funding assistance to low- and moderate-income homeowners for needed home repairs. Among the target demographics are elderly low- and moderate-income homeowners who can use grants for emergency repairs, accessibility modifications and improvements.

Impediment 5: Economic Issues Affecting Housing Choice

Many of the [low] skilled employment opportunities are located outside of the City of Hagerstown. Limited transportation options and a lack of job opportunities in the City or on the bus line create situations where individuals have to forego affordable housing options in order to be closer to work.

Goal: Create an environment that will encourage business development and growth within the City Limits Proper leading to the development of more affordable housing options in developing areas.

Strategies: In order to reach this goal, the following activities and strategies should be undertaken:

- **5-A:** Support and encourage more opportunities for tech related job development and attract higher wage jobs to the City.
- **5-B:** Promote the Façade Grant Program to eligible businesses to enhance and make the City Center more attractive to other potential business.
- **5-C:** Promote and encourage development in the Enterprise Zone to attract employment opportunities that pay a living wage.
- **5-D:** Promote and encourage the Invest Hagerstown Grant Programs and meet the program goals of creating inspiring redevelopment, reusing and repurposing existing vacant and underutilized property, improving rental properties and increasing homeownership.

Accomplishments:

- The City’s DCED revitalized a vacant property to create the “BuroBox” Entrepreneurial Resource Center. The BuroBox serves as a membership-based, collaborative workspace and resource center for entrepreneurs seeking to start or grow the business. The BuroBox has been in operation since 2017.
- The City’s DCED carries out Business Retention, Expansion and Attraction efforts by working with existing and prospective business owners and investors to retain, expand, and attract investment in Hagerstown. These efforts include the administration of a range of incentives and programs (Partners in Economic Progress (PEP), Invest Hagerstown Grant Programs, and others) as well as services such as grand opening and anniversary events.
- The City’s DCED manages a business revolving loan program designed to provide financing for new and expanding businesses for working capital, equipment, property acquisition, and property rehabilitation. Since FFY 2020, approximately 5 business loans have been provided through the HRLF program totaling \$605,000 in loan funds disbursed.
- The City’s DCED oversees seventeen business programs, five homeowner programs, and one non-profit program (CDBG Public Service Grants) with a range of direct financial and tax incentives that have resulted in over \$47 million in investment through public-private partnership projects.

IV. Impediments to Fair Housing 2025

In order to determine if impediments to fair housing choice exist, interviews and meetings were conducted, and an analysis of the fair housing complaints in Hagerstown was undertaken.

A. Fair Housing Complaints:

1. Fair Housing Efforts in the City of Hagerstown

The City of Hagerstown itself does not have a Fair Housing Commission or similar operating group. Educational materials regarding Fair Housing laws are available for consumers at the City's Department of Community and Economic Development (DCED) offices and the Planning and Code Administrative Office.



The City is organizing education and outreach efforts through the Planning and Code Administration Office's. The City's DCED programs related to housing repair funding and homeownership assistance all contain appropriate fair housing disclosures on the programs signature page. Individuals who wish to report a Fair Housing concern are directed to the HUD Fair Housing Hotline and website.

2. Hagerstown Home Store/Hagerstown Neighborhood Development Partnership



Hagerstown Home Store is a homebuyer education and counseling program, operated by Hagerstown Neighborhood Development Partnership, Inc. (HNDP), a non-profit 501(c)(3) promoting fair housing equal opportunity for all residents of the City of Hagerstown and Washington County, MD. The Home Store provides:

- Pre-purchase and Post purchase education including assistance with creating a budget.
- Fair Housing information and consultations
- Lead paint information for homebuyers, renters, and landlords
- Landlord and Tenant rights and responsibilities information and consultations
- Federally assisted housing resources and referrals

The Hagerstown Home Store was designated as a HUD-certified housing counseling agency in 2006. The Home Store supports the City of Hagerstown’s Homeownership Initiative, with funding provided by the U.S. Department of Housing & Urban Development (HUD), the State of Maryland, and the City of Hagerstown, as well as other sources. Its mission statement is:

“The Hagerstown Home Store is improving communities in Washington County, Maryland by promoting home ownership with fair and equal opportunities for all persons.”

For potential homeowners, the Home Store runs the “You Can Be A Homeowner Workshop” and individual counseling. It also provides Homebuyer Counseling certificates, case management, credit reports, and down payment & closing cost assistance (historically funded through the City of Hagerstown’s CDBG allocation) as families navigate the process to purchase a home.

The Home Store also provides Fair Housing information on its site and at its office for tenants and landlords. This includes resources for finding housing in Hagerstown and Washington County, including subsidized housing and homeless shelters. The Home Store also has a section of its site dedicated to Maryland’s rights and regulations about security deposits for renters and property owners, and a link to obtain a Landlord Education Certificate.

3. Maryland Legal Aid

Maryland Legal Aid is a statewide private, nonprofit law firm that provides free, civil legal services to low-income and vulnerable people to address their most fundamental legal problems. From its 12 offices throughout the state and through community-based clinics, the group helps clients preserve and access safe and affordable housing, maintain and regain custody of their children, and be safe from domestic violence. Maryland Legal Aid increases its clients’ economic security by defending against consumer debt, including foreclosures and tax sales, removing barriers to employment, and accessing critical income supports such as unemployment, food stamps and other vital public benefits. Through special projects, it represents elder adults, nursing home residents, children in alleged abuse and neglect cases, and migrant farmworkers. In its advocacy, Maryland

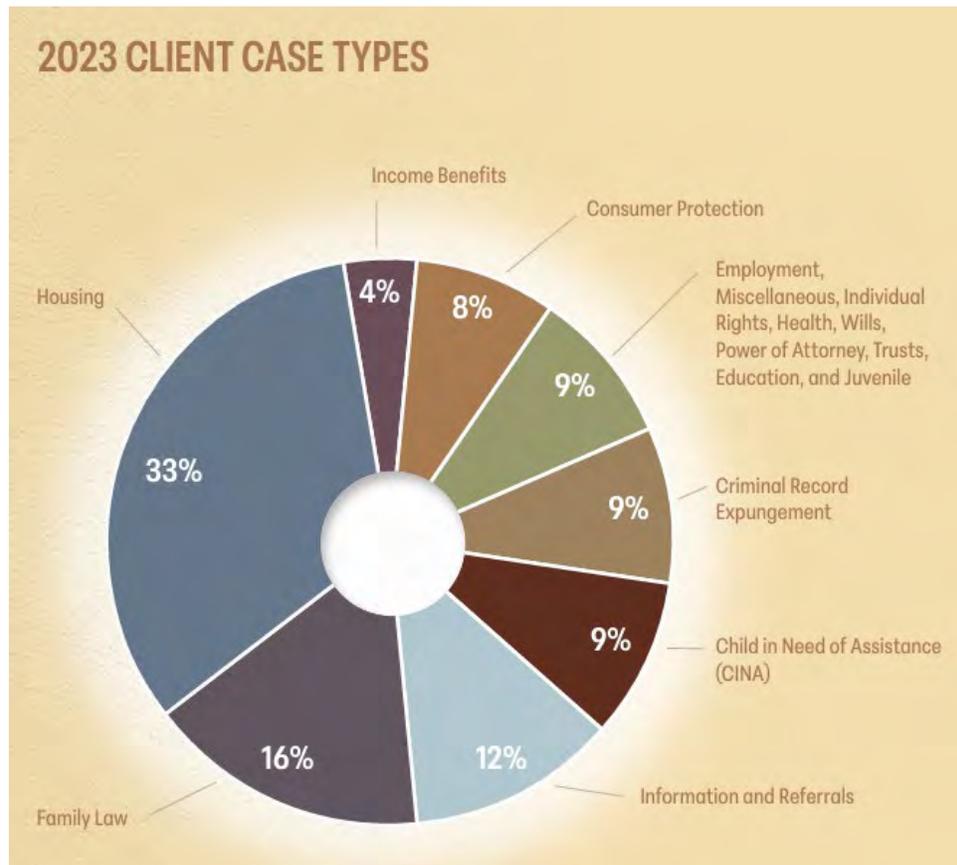
Maryland Legal Aid
Midwestern Maryland Office
22 S. Market Street, Suite. 11
Hagerstown MD, 21701
Phone: (301)-694-7414
Website: www.mdlab.org

Legal Aid seeks systemic change through impact litigation, in our advocacy, and by storytelling. Maryland Legal Aid’s mission is as follows:

“We advocate with and for Marylanders experiencing poverty to achieve equity and social justice through free civil legal services, community collaboration, and systems change.”

Of the 35,606 cases and 29,811 persons served by Maryland Legal Aid in 2023 (the most recent Annual Report), there were 124 cases, and 108 persons served in Washington County. Additionally, of the 176,461 matters handled by Maryland Legal Aid in 2023, 3,056 were in Washington County.

Chart IV-1 – Maryland Legal Aid Case Types Handled in 2023



Source: Maryland Legal Aid 2023 Annual Report

In 2023, Maryland Legal Aid handled 465 foreclosure cases and 8,715 renters’ cases statewide and provided housing services to 10,222 individuals.

4. State of Maryland Commission on Civil Rights

It is the policy of the State of Maryland to provide for fair housing throughout the State, to all its citizens, regardless of race, color, religion, sex, familial status, national origin, marital status, sexual orientation, gender identity, or disability. The Commission consists of

nine members who are appointed by the Governor and approved by the Maryland State Senate. The mission statement of the Maryland Commission on civil rights is as follows:

Maryland Commission on Civil Rights
William Donald Schaefer Tower
6 Saint Paul Street, Suite 900
Baltimore, MD 21202-1631
Phone: 410-767-8600
Website: mccr.maryland.gov

“It is the mission of the Maryland Commission on Civil Rights to ensure opportunity for all through the enforcement of Maryland’s laws against discrimination in employment, housing, public accommodations, and state contracts; to provide educational outreach services related to provisions of this law; and to promote and improve civil rights in Maryland.”

Historically, the Commission for Human relations was created by the General Assembly in 1927. At that time, it was known as the “Interracial Commission”. While the commission did not have enforcement powers or the ability to conduct investigations it publicly opposed the Act of 1904, more commonly known as the “Kerbin ‘Jim Crow’ Law” which required separate dining, seating, and sleeping arrangements for Black people and White people on railroads and steamships. The Commission also brought to light discrepancies in education between white and black communities.

In 1943 the Commission was renamed “the Commission to Study Problems Affecting the Colored Population” and created recommendations to improve the public education system through salary improvements, that Black people be represented on all Boards and Commissions appointed by the state, and a recommendation to establish an institution of higher learning for black people. Despite these recommendations, the Commission lacked staff and funding. In 1951 the Commission was rebranded as the “Commission on Interracial Problems and Relations” and was strongly supported by Governor Theodore McKeldin. Due to the National Civil Rights Movement, the Maryland General Assembly and Governor established the Commission on Human Relations in 1969. For the first

time the Commission was allotted a budget for staff to investigate complaints of discrimination in State Agencies. The Commission continues to adapt and build its framework to carry out its investigatory procedures and in 2011 was renamed the Maryland Commission on Civil Rights to more accurately reflect the anti-discrimination work through the State’s antidiscrimination laws, education, and public outreach.

The Department of Human Rights publishes an annual summary of docketed cases filed during the State Fiscal Year. **Table IV-1** below illustrates the trends for new complaints that were docketed and conciliated for the State of Maryland from FY 2020 through FY 2024. The reports are published each year in an annual report to the Governor and Maryland General Assembly. Employment related complaints have steadily decreased from 79.1% of the total in FY 2020 to 57.4% in FY 2024, and an average of 70% of all complaints filed over the five year period. On the other hand, MCCR’s belief that Housing violations were underreported was borne out by Housing complaints rising from 16.6% of complaints in FY 2020 to 36.5% in FY 2024; they comprised 24% of all complaints over the last five years. On average, 5% complaints are regarding Public Accommodation, 0.6% of complaints reference State Contracts, and about 0.1% of complaints are about Health Services (the newest category, added for FY 2024).

Table IV-1 – MCCR New Complaints Docketed

Category	2020	2021	2022	2023	2024	Total
Employment	609	519	461	443	388	2,420
Housing	128	159	120	167	247	821
Public Accommodations	33	34	36	46	35	184
State Contracts	0	4	6	6	3	19
Health Services (as of State FY 2024)	-	-	-	-	3	3
TOTALS	770	716	623	661	676	3,447

Source: State of Maryland Commission on Civil Rights. Includes in/out transfers.

During State FY 2024, there were 12 employment complaints, and 6 housing complaints received in Washington County. This was an increase from 4 employment complaints and 1 housing complaint during State FY 2023 (there was also 1 public accommodation complaint in FY 2023).

The **Table IV-2** below discusses complaint closure by category. Note: individual categories are not provided for FY 2020 through FY 2022, and there were no closures for Health Services complaints.

Table IV-2 – MCCR Complaints Closed

Category	2020	2021	2022	2023	2024	Total
Employment	Individual totals not reported			442	546	988
Housing				167	179	346
Public Accommodations				46	54	100
State Contracts				6	2	8
TOTALS	732	716	572	798	781	3,599

Source: State of Maryland Commission on Civil Rights

Of statewide FY 2024 closures, 484 had no probable cause, 138 were administrative closures, 97 were withdrawn with benefits, 59 resulted in settlements, 2 found probable cause, and 1 had a successful conciliation with none having unsuccessful conciliations. The MCCR obtained \$1,444,455 in total monetary relief, divided into \$1,265,249 in employment cases, \$138,582 in housing cases, and \$40,624 in public accommodation cases.

5. Fair Housing & Equal Opportunity (HUD)

The U.S. Department of Housing and Urban Development’s (HUD) Office of Fair Housing & Equal Opportunity (FHEO) receives complaints regarding alleged violations of the Fair Housing Act. These complaints can be filed directly via HUD’s Housing Discrimination hotline or lodged with state and local fair housing agencies through the Fair Housing Assistance Program (FHAP).

Baltimore Field Office
 Bank of America Building-Tower II
 100 South Charles Street-5th Floor
 Baltimore MD, 21201

HUD Housing Discrimination
 Hotline: 1-800-669-9777
 Website: www.hud.gov

According to the Fair Housing Act, Fair Housing violations may be alleged on the following bases:

- Race
- Color
- National Origin

- Religion
- Sex*
- Familial Status
- Disability
- Retaliation**

*Following the 2020 *Bostock v. Clayton County* Supreme Court decision, HUD and other Federal agencies were directed to investigate discrimination on the basis of sexual orientation and gender identity as a subset of discrimination on the basis of sex. Executive Order 14168 of January 20, 2025 countermanded this direction except as defined in existing Civil Rights law.

**It is illegal to retaliate against any person for making an allegation, testifying, assisting, or participating in any manner in a proceeding under HUD’s allegation process at any time, even after the investigation has been completed. The Fair Housing Act also makes it illegal to retaliate against any person because that person reported a discriminatory practice to a housing provider or other authority.

The complaints received for the City of Hagerstown are shown in the following **Table IV-3** to illustrate the most common basis for complaints over the five year span from January 1, 2019, to December 31, 2024. NOTE: some complaints have more than one basis, so the number of complaints per basis do not equal the total complaints and the percentage of complaints per basis is more than 100%.

Table IV-3: Basis for Complaint by Percent in the City of Hagerstown

Basis	Number	Percentage
Race	6	21.4%
Color	0	0%
National Origin	2	7.1%
Religion	0	0%
Sex (including gender identity and sexual orientation)	1	3.6%
Familial Status	0	0%
Disability	20	71.4%
Retaliation	8	28.6%
Total Complaints	28	100%

Source: U.S. Dept. of HUD-FHEO, Philadelphia Regional Office

The large majority of complaints were on the basis of disability. These complaints generally alleged some combination of a landlord’s refusal to make reasonable

accommodation or permit reasonable modifications, discriminatory language or facilities, or other denial of housing. It appears that all of the complaints are related to rental housing rather than for-sale housing.

Table IV-4 enumerates the reasons for which Fair Housing complaints were closed over the last five years.

Table IV-4: Fair Housing Complaint Closure in the City of Hagerstown

Closure Reason	Number	Percentage
Conciliation/settlement successful	6	21.4%
No cause determination	12	42.9%
Complaint withdrawn by complainant after resolution	3	10.7%
Complaint withdrawn by complainant without resolution	3	10.7%
Open complaint (as of 12/31/2024)	4	14.3%

Source: U.S. Dept. of HUD-FHEO, Philadelphia Regional Office

The following **Table IV-5** summarizes all of the complaints filed with the U.S. Department of Housing and Urban Development’s Office of Fair Housing & Equal Opportunity between January 1, 2019, and December 31, 2024, in the City of Hagerstown, MD. (All of the Fair Housing complaints for Washington County over the last five years were filed in Hagerstown.)

Table IV-5 – HUD-FHEO Fair Housing Complaints for the City of Hagerstown, MD, 2019-2024

HUD / FHAP	ZIP Code	Filing Date	Closure Date	Closure Reason	Bases	Issues
FHAP	21742	2/25/2019	6/13/2019	No cause determination	Disability	Otherwise deny or make housing unavailable; Failure to make reasonable accommodation
FHAP	21740	5/10/2019	6/27/2019	Conciliation / settlement successful	National Origin	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, etc.)
FHAP	21740	9/19/2019	1/27/2020	Complaint withdrawn by complainant after resolution	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to permit reasonable modification
FHAP	21740	11/4/2019	3/10/2020	No cause determination	Disability	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable
FHAP	21742	6/11/2020	7/15/2020	Conciliation / settlement successful	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation
FHAP	21742	8/27/2020	10/20/2020	Complaint withdrawn by complainant without resolution	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation
FHAP	21740	11/2/2020	6/15/2021	Conciliation / settlement successful	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, etc.)



FHAP	21740	3/29/2021	6/25/2021	Conciliation / settlement successful	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation
FHAP	21742	4/20/2021	2/1/2023	No cause determination	Disability	Failure to permit reasonable modification
HUD	21740	10/22/2021	9/26/2022	Conciliation / settlement successful	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation
FHAP	21740	12/15/2021	5/30/2023	No cause determination	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, etc.); Failure to make reasonable accommodation
FHAP	21742	3/10/2022	2/10/2023	Complaint withdrawn by complainant without resolution	Disability	Otherwise deny or make housing unavailable
FHAP	21740	4/13/2022	5/3/2022	No cause determination	Race, Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, etc.); Failure to make reasonable accommodation
FHAP	21742	6/7/2022	9/23/2022	Complaint withdrawn by complainant without resolution	Disability	Discriminatory refusal to rent
FHAP	21742	6/9/2022	9/15/2022	Conciliation / settlement successful	Disability	Discriminatory refusal to rent



FHAP	21740	8/18/2022	12/1/2023	Complaint withdrawn by complainant after resolution	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation
FHAP	21742	1/3/2023	6/30/2023	No cause determination	Race	Otherwise deny or make housing unavailable
FHAP	21740	1/5/2023	12/11/2023	No cause determination	Race, Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, etc.); Failure to make reasonable accommodation
FHAP	21740	1/11/2023	3/27/2023	No cause determination	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation
FHAP	21740	3/1/2023	6/15/2023	No cause determination	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation
FHAP	21740	6/9/2023	12/15/2023	No cause determination	Race, Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, etc.); Failure to make reasonable accommodation
FHAP	21740	7/11/2023	1/29/2024	No cause determination	Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, etc.)



FHAP	21742	9/12/2023	2/9/2024	No cause determination	National Origin	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable
FHAP	21740	6/13/2024	-	-	Retaliation	Discriminatory terms, conditions, privileges, or services and facilities
FHAP	21742	8/21/2024	-	-	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, etc.); Failure to make reasonable accommodation
FHAP	21742	9/18/2024	11/26/2024	Complaint withdrawn by complainant after resolution	Race	Discriminatory refusal to rent
FHAP	21740	12/12/2024	-	-	Race, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation
FHAP	21740	12/12/2024	-	-	Sex	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, etc.)

Source: U.S. Dept. of HUD-FHEO, Philadelphia Regional Office

5. Human Services, Housing, and Community and Economic Development Agencies

The City of Hagerstown interviewed agencies offering housing, human services, and community and economic development within the City in order to obtain their input and gain insight into potential impediments to fair housing. The following agencies were engaged in roundtable discussions or individual meetings, or returned stakeholder surveys:

- City of Hagerstown:
 - Mayor
 - City Administrator
 - City Councilmembers
 - City Engineer
 - Department of Community & Economic Development
 - Planning & Zoning Department
 - Public Works Department
 - Utilities Department
 - Fire Department
 - Police Department
- Hagerstown Housing Authority
- Washington County Community Action Council
- Hagerstown Neighborhood Development Partnership (HNDP/Hagerstown Home Store)
- Habitat for Humanity of Washington County
- Meritus Health
- Washington County Health Department
- Western Maryland Consortium
- Hitachi Rail
- Maryland Department of Labor, Hagerstown American Jobs Center
- Greater Hagerstown Committee
- Washington County Chamber of Commerce
- Head Start of Washington County
- Maryland Department of Education, Judy Centers of Washington County
- Washington County Free Library
- Boys & Girls Club of Washington County
- Ladders to Leaders
- United Way of Washington County
- The ARC of Washington County

-
- First Home Mortgage
 - Fulton Mortgage Company
 - Pen-Mar REALTORS
 - Hagerstown Area Religious Coalition (HARC)
 - Washington County Department of Social Services
 - Potomac Community Services (fka Potomac Case Management)
 - CASA, Inc.
 - Reach of Washington County
 - It's a Blessing to Be a Blessing
 - Washington County Council on Aging
 - True North
 - Girls Inc.
 - Hagerstown Community College
 - Covenant Life Church

Each of these agencies provided feedback on housing, homelessness, and community-related issues in the City of Hagerstown. Complete meeting notes can be found in the Appendix of the FFY 2025-2029 Five-Year Consolidated Plan. The following is a summary of some of the comments that were received during the roundtable discussions:

- Housing is unaffordable in the City and even more unaffordable in the County and region.
- There needs to be an emphasis on homeownership in Hagerstown.
- Absentee property owners are a growing problem, especially those who purchase multiple properties and let them deteriorate.
- Due to the lack of rental housing and pressures from the Baltimore and Washington areas, landlords are able to charge very high security deposits and application fees, demand high credit scores, and exclude anyone who has a past eviction.
- Some lessors make a habit of collecting application fees without ever intending to lease their property.
- Social service organizations need to communicate their needs, assets, and abilities more effectively.
- There needs to be more mental health counseling available.
- There needs to be more effective substance abuse treatment.
- Government regulations sometimes hinder social services, even though they are meant to help.

- The City and County have different governing priorities and philosophies and need to work together more effectively.
- Even though wages have increased around Hagerstown, they are not high enough and it's limiting homeownership.
- Transportation is unreliable, unaffordable, or unavailable for second and third shift workers.
- Public transportation is not sufficient.
- Youth need more opportunities for out-of-school and after-school activities.

B. Public Sector:

Part of the Analysis of Impediments is to examine the public policies of the jurisdiction and the impact on fair housing choice. The local government controls land use and development through the comprehensive plan, zoning regulations, subdivision regulations, and other laws and ordinances passed by the local governing body. These regulations and ordinances govern the types of housing that may be constructed, the density of housing, and the various residential uses in a community. Local officials determine the community's commitment to housing goals and objectives. Therefore, the local policies determine if fair housing is promoted or passively tolerated.

This section of the Analysis of Impediments evaluates the City's policies to determine if there is a commitment to affirmatively further fair housing.

1. Five-Year Priorities and Goals

The City of Hagerstown's FFY 2025-2029 Five-Year Consolidated Plan serves as a consolidated planning document, an application, and a strategic plan for the City's Community Development Block Grant (CDBG) Program and HOME Investment Partnership Program (HOME). The Five-Year Consolidated Plan proposes six (6) Priorities to address the housing, community development and economic development needs in the City of Hagerstown. These Priorities and subsequent goals to address them are as follows:

Housing Priority - (HS)

There is a need to increase the amount of affordable, decent, safe, sanitary, accessible and sound housing for homebuyers, owners, and renters.

Goals:

- **HS-1 Housing Improvements** - Provide financial assistance to low- and moderate-income homeowners and landlords of affordable housing to rehabilitate their existing owner- and renter-occupied housing.
- **HS-2 Housing Construction** - Increase the supply of affordable, decent, safe, sanitary, accessible and sound housing to owners and renters in the City by assisting with land acquisition, development fees, infrastructure improvements, and construction costs.

- **HS-3 Homeownership** - Promote homeownership by assisting low- and moderate-income homebuyers to purchase homes through down payment / closing cost assistance and associated housing counseling.
- **HS-4 Anti-Poverty Actions** - Reduce the isolation of income groups within areas with high concentrations of poverty through spatial de-concentration of housing opportunities for lower income persons and minority persons.
- **HS-5 Fair Housing** - Promote fair housing choice through education, training, outreach and housing counseling services. to affirmatively further fair housing and address public and private policies that may interfere with such activities.
- **HS-6 Acquisition and Rehabilitation** - Rebuild and revitalize neighborhoods by purchasing, rehabilitating, and reselling distressed residential properties to low- and moderate-income homebuyers.

Homeless Priority - (HO)

There is a need for services and housing opportunities for homeless persons and persons or families at risk of becoming homeless.

Goals:

- **HO-1 Housing Opportunities** - Improve housing opportunities and living conditions for persons and families who are homeless or who are at risk of homelessness, including emergency, transitional, and permanent supportive housing.
- **HO-2 Support and Management Services** - Promote and assist programming offered by public agencies and non-profit organizations that is directed toward helping persons who are homeless or who are at risk of homelessness.
- **HO-3 Homeless Prevention and Rapid Re-Housing** - Promote and assist in anti-eviction practices, rent and utility assistance, and programs for rapid re-housing to allow residents to live independently.

Other Special Needs Priority - (SN)

There is a need to increase housing opportunities, services, and facilities for persons with special needs.

Goals:

- **SN-1 Special Needs Housing** - Ensure there is a range of affordable, decent, safe, sanitary, accessible and sound housing options available and accessible to residents who are elderly, have disabilities, or have other special needs, including making improvements and reasonable accommodations to existing housing stock.
- **SN-2 Accessibility and Removal of Architectural Barriers** - Promote and assist in making accessibility improvements to public facilities and spaces, to allow residents who are elderly, have disabilities, or have other special needs to freely take part in everyday life.
- **SN-3 Social Services** - Promote and support public services such as transportation and medical services which assist residents who are elderly, have disabilities, or have other special needs to achieve dignity, well-being and self-sufficiency.

Community Development Priority - (CD)

There is a need to upgrade and improve community facilities, infrastructure, and public services, in order to rejuvenate socially and economically distressed neighborhoods and to improve the quality of life for residents.

Goals:

- **CD-1 Community Facilities** - Improve public parks and facilities, recreational facilities, neighborhood facilities, and trails to improve the health, well-being, and community pride of residents.
- **CD-2 Infrastructure** - Improve public infrastructure through rehabilitation, reconstruction, and new construction of streets, sidewalks, bridges, curbs, walkways, drinking water, stormwater systems, sanitary sewers, lighting enhancements, etc.
- **CD-3 Public Services** - Improve and enhance public service programs for youth, the elderly, persons with disabilities, and other low- and moderate-income City residents, such as nutritional services, substance abuse treatment, childcare, and literacy programs.

- **CD-4 Neighborhood Revitalization** - Make strategic investment to improve low-income neighborhoods and other areas exhibiting conditions of slums and blight through the Choice Neighborhoods Initiative and other programs.
- **CD-5 Public Safety** - Improve and enhance public safety and the ability to respond to emergency situations through facility improvements, purchase of new equipment, crime prevention, and other related activities.
- **CD-6 Code Enforcement** - Continue a systematic code enforcement program to ensure that the existing housing stock remains affordable, decent, safe, sanitary, accessible and sound.
- **CD-7 Clearance/Demolition** - Remove and eliminate slum and blighting conditions through demolition of vacant, abandoned, and dilapidated structures.
- **CD-8 Transportation** - Support the expansion of public transportation and access to bicycle, van, bus and automobile service to assist residents in accessing social services, healthcare, senior centers, employment opportunities, and other needs.

Economic Development Priority - (ED)

There is a need to increase employment, workforce development, self-sufficiency, educational training, and empowerment for residents of the City.

Goals:

- **ED-1 Employment** - Support and encourage job creation, job retention, and job training opportunities for unemployed and under-employed residents.
- **ED-2 Downtown Revitalization** - Support downtown and neighborhood revitalization efforts which enhance the urban core through the Maryland Main Street Program, the Community's City Center Plan, and other programs.
- **ED-3 Development and Redevelopment** - Support business and commercial growth through expansion, new development, entrepreneurship and small business initiatives, and redevelopment & adaptive reuse of vacant or underutilized properties.

Administration, Planning, and Management Priority - (AM)

There is a need for planning, administration, management, and oversight of Federal, State, and local funded programs to address the housing, community development and economic development needs.

Goals:

- **AM-1 Overall Coordination** - Provide program management and oversight for the successful administration of Federal, State, and locally funded programs, including planning services for special studies, annual action plans, five-year consolidated plans, substantial amendments, consolidated annual performance and evaluation reports (CAPER), environmental reviews and clearances, fair housing, and compliance with all Federal, State, and local laws and regulations.

The City of Hagerstown receives CDBG and HOME funds from HUD as an entitlement municipality under the program. In FFY 2025 the City will receive \$791,400.00 in CDBG funding and \$361,181.17 in HOME funding. It also expects to receive \$75,000.00 in CDBG Program Income and will match its HOME allocation with \$138,818.83 in City funds. The City will allocate its funds to residential rehabilitation, code enforcement, public services, homebuyer assistance, and infrastructure improvements. The entirety of the City's CDBG and HOME allocation will directly benefit low- and moderate-income persons.

The City of Hagerstown proposes to undertake the following activities with the FFY 2025 CDBG and HOME funds:



Table IV-7 – FFY 2025 CDBG and HOME Allocations for the City of Hagerstown

#	CDBG Project Name	
1.	Accessibility Ramps	\$125,000.00
2.	Alleys	\$100,000.00
3.	Wheaton Park Tennis Courts	\$25,000.00
4.	Skate Park Sidewalks & Steps	\$40,000.00
5.	City Park Tennis/Pickleball Courts	\$30,000.00
6.	HARC - Micah's Backpack	\$14,800.00
7.	Girls Inc. - Kids' Café	\$11,800.00
8.	Horizon Goodwill - Breakfast Outreach and Homeless Resource Center	\$9,800.00
9.	Literacy Council - Tutors Needed	\$5,800.00
10.	REACH Bridge to Change Program	\$19,800.00
11.	America's Hauling for Hope - Helping Hands Senior Outreach	\$11,800.00
12.	TruNorth Company - Hagerstown Area Recovery Transportation	\$19,800.00
13.	United Way - Ride United Network	\$14,800.00
14.	Community Free Clinic	\$9,800.00
15.	Cibus Mission - Youth Urban Farm & Fix-It-Keep-It Bike Repair	\$9,800.00
16.	Habitat for Humanity - Brush with Kindness Program	\$20,000.00
17.	Commission on Aging - Home Repair Grant Program	\$20,000.00
18.	Code Inspector	\$35,000.00
19.	Residential Single-Family Emergency Repair	\$64,849.00
20.	Single-Family Rehabilitation Administration	\$100,000.00
21.	CDBG Program Administration	\$178,551.00
	Total CDBG Expenditure	\$866,400.00
#	HOME Project Name	
22.	CHDO Set-Aside	\$75,000.00
23.	Homeownership Acquisition, Rehabilitation and Resale	\$275,000.00
24.	Residential Single-Family Rehabilitation	\$100,000.00
25.	HOME Program Administration	\$50,000.00
	Total HOME Expenditure	\$500,000.00

2. Other Funds

In addition to CDBG funds, the following public resources have been received by agencies in the City of Hagerstown for a variety of projects and programs that benefit the City:

- Federal Historic Preservation Fund grants
- Maryland Department of Natural Resources Project Open Space Funds
- Maryland Department of Housing and Community Development funds
- Maryland Heritage Areas Program grant funds
- Maryland Bricks-and-Mortar Preservation grants

3. Low Income Housing Tax Credits

The Low-Income Housing Tax Credit (LIHTC) Program was created under the Tax Reform Act of 1986 and is intended to attract private investment to develop affordable rental housing for low- and moderate-income households.

There are currently no known projects, proposed projects, or planned projects in the City of Hagerstown that will be using LIHTC funds. The City is supportive of the use of LIHTC projects to provide affordable housing to low-income households. It has developed twenty-two LIHTC projects between 1987 and 2017 with a total of 1,457 housing units, of which 1,352 were low-income housing units.

The following is a list of LIHTC projects which were built in the City of Hagerstown from 1987 through 2024. Any missing or unreported information is left blank.



Table IV-8 – LIHTC in the City of Hagerstown

HUD ID:	Project Name:	Address:	ZIP Code:	Total Units:	Low-Income Units:	Construction Type:
MDA19870020	EAST FRANKLIN STREET APARTMENTS	201 E Franklin St	21740	8	6	-
MDA19890065	HALFWAY MANOR	200 W Lincoln Ave	-	100	100	-
MDA19930085	NORTH POTOMAC STREET	35 N Potomac St	21740	4	4	-
MDA19940105	WEST BETHEL STREET APTS	134 Bethel St	21740	9	5	-
MDA20020055	HAGERSTOWN / ROBINWOOD SENIOR I	20014 Rosebank Way	21742	64	64	New Construction
MDA20030020	GATEWAY CROSSING I	908 Main Ave	21740	83	83	New Construction
MDA20040045	HAGERSTOWN / ROBINWOOD SENIOR II	20014 Rosebank Way	21742	56	56	New Construction
MDA20050062	GATEWAY CROSSING II	929 Ross St	21740	45	45	-
MDA20050063	GATEWAY CROSSING III	25 Elgin Blvd	21740	77	77	-
MDA20060040	GATEWAY CROSSING IV	155 Merrbaugh Dr	21740	85	85	New Construction
MDA20060115	WASHINGTON GARDEN APARTMENTS	950 Security Rd	21742	100	100	Acquisition and Rehab
MDA20110008	CWILLIAMS BROOKS	45 W Baltimore St	21740	60	60	-
MDA20180003	BETHEL GARDENS APARTMENTS	356 Henry Avenue	21740	94	94	Acquisition and Rehab
MDA20180015	HOPEWELL STATION	11341 Cici Way	21740	60	60	-
MDA20210016	MCCLEARY HILL PHASE I	West Washington St	21740	68	61	New Construction

Source: lihtc.huduser.gov

4. Planning, Zoning, and Building Codes

City of Hagerstown

The City of Hagerstown Land Management Code is under Section 140 Part II: General Legislation of the City Code and was adopted by the Mayor and City Council on July 16, 1999, by ordinance number 1991-9. The Code has been amended and updated through July 18, 2024.

The Zoning Ordinance of the City of Hagerstown divides the City into five base zoning districts: Agricultural Transition, Residential, Mixed Use, Commercial, and Industrial. Each zoning district contains permitted and conditional land uses, along with associated development standards. These development standards establish minimum lot sizes, maximum lot coverage, parking requirements, minimum yard setbacks and related requirements. The identified categories are:

- **AT (Agricultural Transition):** The purpose of the AT District is to enable agricultural uses to continue on newly annexed land, if desired by the property owner, as a temporary use until such time that the land is re-zoned for development.
- **RMOD (Residential – Moderate Density):** To provide areas for moderate-density residential development.
- **RMED (Residential – Medium Density):** To provide areas for medium density residential development.
- **RH District (Residential – High Density):** To provide areas for high density residential development. Also permitted are businesses of a type which serve nearby residents.
- **RO District (Residential – Office):** To provide for office uses in residential neighborhood containing large houses to make continued use of these properties feasible; and to provide a buffer between commercial and residential areas.
- **N-MU (Neighborhood – Mixed Use):**
 - Accommodate mixed-use buildings serving retail, service, and other uses on the ground floor and residential units above the nonresidential space;
 - Allow for commercial uses of a scale and intensity compatible with a residential neighborhood;

- Allow for exclusively residential buildings of a scale and intensity compatible with the City’s traditional neighborhood building design;
- Encourage development that exhibits the physical design characteristics of pedestrian- oriented, storefront-style shopping streets;
- Provide flexibility for adaptive re-use of old, non-residential buildings in these areas; and
- Promote the health and well-being of residents by encouraging physical activity, allowing for transportation alternatives, and providing for interaction of uses during day and evening hours.
- **CC-MU (City Center – Mixed Use):**
 - Promote development of a compact, pedestrian-oriented city center consisting of a diverse mix of residential, business, commercial, office, institutional, educational, and cultural and entertainment activities for workers, visitors, and residents;
 - Encourage pedestrian-oriented development within walking distance of transit opportunities at densities and intensities that will help to support transit usage and city center businesses;
 - Promote the health and well-being of residents by encouraging physical activity, alternative transportation, and greater social interaction;
 - Create a place that represents a unique, attractive, and memorable destination for visitors and residents; and
 - Enhance the community’s character through the promotion of high- quality urban design.
- **CL (Commercial – Local):** To provide for the daily shopping and business needs of nearby residents and workers by permitting retail and service uses which are compatible in use and scale with the adjacent residential neighborhood.
- **CG (Commercial – General):** To provide locations for businesses of a general nature to serve the community.
- **CR (Commercial – Regional):** To provide for commercial uses customarily found in a regional shopping center.
- **POM (Professional Office – Mixed):** To provide locations for offices, medical offices, research and development, institutional uses, certain industrial uses, and limited support retail. Retail and service uses are secondary and should generally serve the businesses and employees in the

office area including personal services, restaurants, day-care and other similar support services. These uses should be met in ways that do not substantially increase peak-hour traffic. It is anticipated that projects within this zoning classification will be planned and designed as a unified development.

- **INST (Institutional):** To provide locations for institutional uses to serve the community. Examples of existing large-scale institutional uses include public school campuses, hospital and nursing home properties, recreational facilities with fields, parks, professional ball stadiums, cemeteries, etc.
- **IR (Industrial Restricted):** To provide locations for offices and light industrial uses which do not require special measures to control odor, dust or noise and which do not involve hazardous waste and whose environmental impacts are contained within the property limits.
- **IG (Industrial General):** To provide for those manufacturing, processing and storage uses which should be separated from other uses by reason of characteristics which may conflict with other uses. The exclusion of residential and commercial uses is intended to promote the economic welfare of the city by reserving especially suited areas for industry and by controlling and intermingling of incompatible uses.
- **I-MU (Industrial – Mixed Use):** To provide locations for light industrial parks, office parks, research and development facilities, high-tech communications and technology facilities, trucking and distribution facilities, and minor commercial uses that support job centers.

In addition to these fifteen (15) districts the City created four (4) Overlay Districts:

- **PUD District (Planned Unit Development):**

The PUD District is established to permit and promote community scale, open air streetscape/ main street style commercial and mixed-use areas consisting of businesses serving the shopping and service needs of the community at large in an attractive public realm and promote public convenience and accessibility and contain common spaces, commercial, office and residential uses, and even limited warehousing and light manufacturing if designed in keeping with the scale of the development. The PUD District is designed to be flexible in development controls but requires integrated design and appropriate transitions to surrounding existing land uses and promotes a diverse mix of housing options. The

district is not intended to be accomplished in a fragmented, lot-by-lot fashion, developed with a single type of land use, nor developed in a manner where uses are segregated into dedicated pods throughout the tract. The uses will develop in an orderly manner in order to ensure achievement of development with multiple uses and will be developed on a harmonious architectural theme and in a manner that focuses traffic flow on vehicles, bicycles and pedestrians. Design and scale of a PUD will vary depending on the size of the tract and intended mix of uses.

PUD development will be implemented as one of the two following types:

- **PUD-V District (Planned Unit Development – Village):** The village style PUD is intended for a predominantly residential community, with an integrated mix of housing types on traditional streetscapes and village greens with a commercial component that, through necessity, must be oriented to adjoining collector and/or arterial streets, but will be developed with very small setbacks unless offset by amenity laden streetscaping.
- **PUD-R District (Planned Unit Development – Regional):** The regional style PUD is intended to serve a regional market that is predominantly commercial but will contain an integrated mix of uses, using traditional streetscapes, but permit more intense commercial and light manufacturing and warehousing type uses than would otherwise be permitted in the PUD-V development scheme. While the PUD-R development concept is predominantly commercial, it will contain a significant residential element with multiple housing types.

In all PUD development, housing types are required to be mixed and to the degree possible, commercial and residential uses mixed in buildings and streetscapes. The Mayor and Council shall only approve a concept plan and the Planning Commission shall only approve development plans and site plans that generally integrate housing types and commercial types and do not create segregated areas or pods that separate housing types and commercial use types.

- **Conversion District:** The purposes of this district are to stimulate the adaptive reuse of existing, nonresidential, multistory and large one-story structures, to maintain and increase the City's assessable base, to expand

business and employment opportunities, and to protect residential neighborhoods from excessive traffic, odors, fumes, noise, and light. The Conversion District provides an alternative development concept for underutilized structures while protecting the general health, safety, welfare, and aesthetics through the commitment to an approved development concept plan. Such structures must be in existence prior to March 7, 1977.

- **Local Conversion District:** The purposes of this district are to stimulate the adaptive reuse of existing, nonresidential and mixed-use structures embedded within densely developed residential districts and communities, to maintain and increase the city's assessable tax base, and to expand business and employment opportunities. The Local Conversion District allows for alternate forms of use and development for buildings and/or spaces that are part of or very close to residential uses in residential districts. Allowing such uses to fit into existing commercial and mixed-use structures re-establishes the historically mixed-use nature of the City's 19th and early 20th Century residential communities.

The Local Conversion District provides an alternative development concept for underutilized and vacant non-residential and mixed-use structures while protecting the general health, safety, welfare, and aesthetics in the vicinity of the site through the commitment to an approved development concept plan. A Local Conversion District can be overlaid on an active or expired non-conforming non-residential or mixed-use structure provided that it has not been converted to a use permitted by right or special exception, which voids the nonconformity. It is acknowledged that such uses will be outwardly commercial or mixed-use in nature and operation but are reviewed individually to ensure the proposed use or uses and improvements are not an undue burden on the surrounding area.

- **Historic Districts and Landmarks:** The Mayor and City Council may designate an historic district or landmark as an overlay zone in any area of the City. The historic district and landmark designation can concurrently occur as an overlay with any of the other various districts. Should a site, structure, or district have historical, archaeological, or architectural significance, it may be eligible for designation as an historic district or landmark.

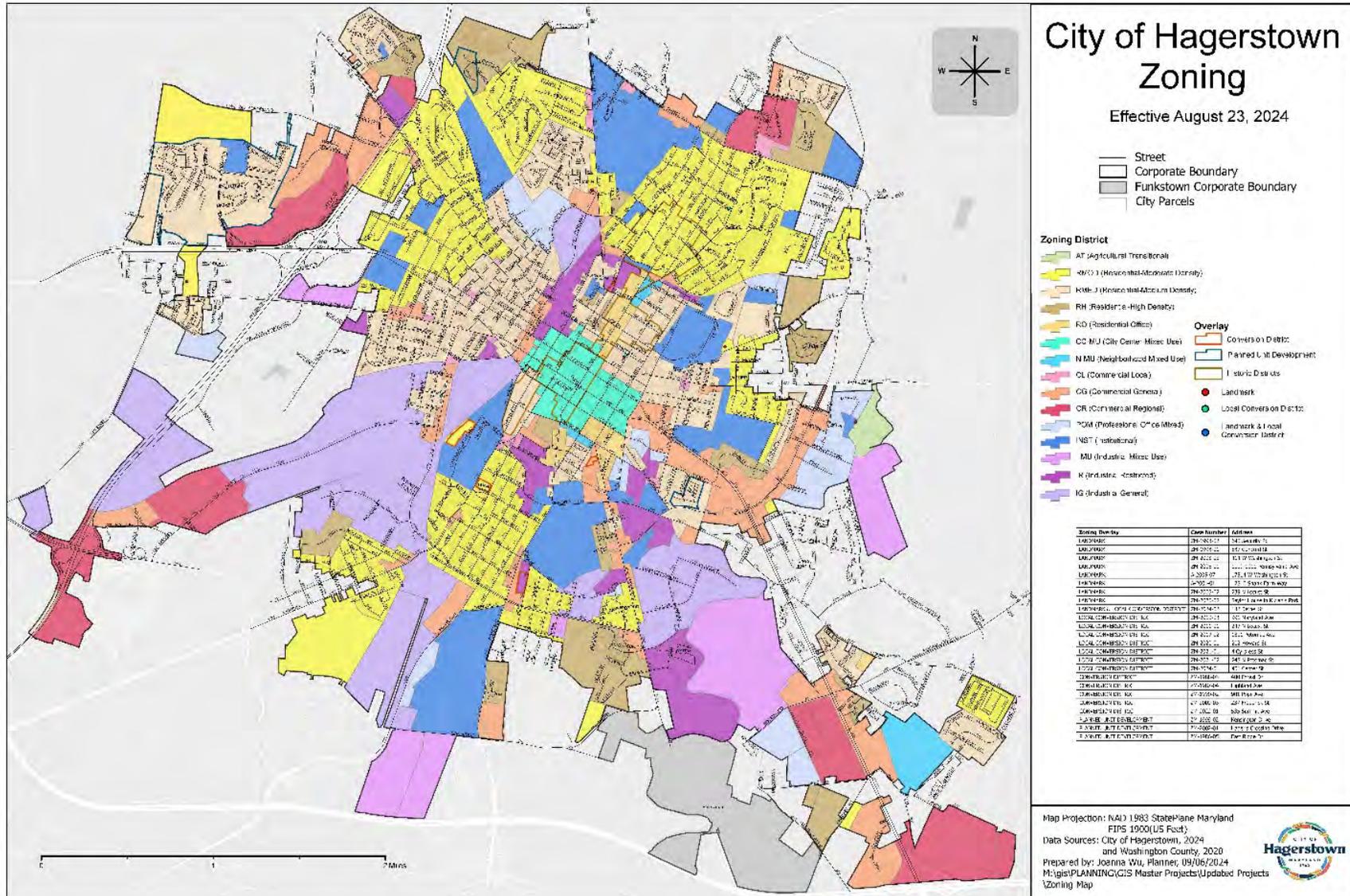
The 2020 Comprehensive Zoning plan implemented the policies of the 2018 Comprehensive Plan, known as *VisionHagerstown 2035*. The map amendments that implemented the policies of this Plan became effective on July 23, 2020, and those uses rendered nonconforming by these map amendments shall have an effective date of nonconformity on that date. The Department of Planning and Zoning administers the City’s Land Management Code which is current as amended through July 18, 2024. The City’s ordinance was reviewed for conformance with the Fair Housing Act of 1968, as amended, the Americans With Disabilities Act, as amended, and HUD Regulations and Guidelines.

While the City has added some of the definitions suggested in the last Analysis of Impediments to the Land Management Code such as “Group Home” and has provided additional categories such as “Crisis Care Facilities” and “Emergency Transient Housing”, further additions and clarifications should be considered:

- Expand the definition of “Family” to include: *A single person occupying a dwelling and maintaining a household; or, two or more persons related by blood, marriage, cohabitation, adoption, or any other partner relationship or child/guardian relationship such as foster care, occupying a dwelling, living together, and maintaining a common household.*
- Include the Federal definition for “Handicapped” or “Disabled” according to the Americans with Disabilities Act: *DISABILITY The term “disability” means, with respect to an individual—*
 - a. *a physical or mental impairment that substantially limits one or more major life activities of such individual;*
 - b. *a record of such an impairment; or*
 - c. *being regarded as having such an impairment.*
- Include a definition for “Transitional Housing”.
- Within permitted uses define “moderate,” “medium,” and “large” for residential development.

The following is a copy of the City of Hagerstown’s Zoning District Map, effective August 2024:

City of Hagerstown Zoning District Map



U.S. Department of Housing and Urban Development (HUD)

HUD encourages its grantees to incorporate “visitability” principles into their designs. Housing that is “visitable” has the most basic level of accessibility that enables persons with disabilities to visit the home of a friend, family member, or neighbor. “Visitable” homes have at least one accessible means of egress/ingress for each unit, and all interior and bathroom doorways have 32-inch clear openings. At a minimum, HUD grantees are required to abide by all Federal laws governing accessibility for persons with disabilities.

Federal laws governing accessibility requirements include Section 504 of the Rehabilitation Act, the Americans with Disabilities Act, and the Fair Housing Act.

Section 504 of the Rehabilitation Act (24 CFR Part 8), known as “Section 504” prohibits discrimination against persons with disabilities in any program receiving Federal funds. Specifically, Section 504 concerns the design and construction of housing to ensure that a portion of all housing developed with Federal funds is accessible to those with mobility, visual, and hearing impairments.

The Americans with Disabilities Act (42 U.S.C. 12131; 47 U.S.C. 155, 201, 218, and 225) (ADA) prohibits discrimination against persons with disabilities in all programs and activities sponsored by state and local governments. Specifically, ADA gives HUD jurisdiction over housing discrimination against persons with disabilities.

The Fair Housing Act was amended in 1988 to include persons with disabilities as a protected class, as well as to include design and construction requirements for housing developed with private or public funds. Specifically, this law requires property owners to make reasonable modifications to units and/or public areas in order to allow the disabled tenant to make full use of the unit. Additionally, property owners are required to make reasonable accommodations to rules or procedures to afford a disabled tenant full use of the unit. As it relates to local zoning ordinances, the Fair Housing Act prohibits local government from making zoning or land use decisions or implementing land use policies that exclude or discriminate against persons of a protected class.

5. Taxes

Though not an impediment to fair housing per se, real estate property taxes impact the affordability of owner- and renter-occupied housing.

The general residential real estate tax receipts in the City of Hagerstown are divided among the State of Maryland, Washington County, and the Municipality of Hagerstown. **Table IV-9** illustrates the taxes assessed on real estate, personal, and public utilities in “mills” (1/10 of a cent per dollar of value). Real Estate taxes have been identified as a significant cause of housing cost burden, and both personal property tax and utility tax increase the burden on low-income families.

Table IV-9: Tax Rates in the City of Hagerstown, FY 2024

	Municipal	County	State	Total
Real Property Tax rates	1.0020	0.8030	0.1120	1.9170
Assessment on \$100,000 property	\$100.20	\$80.30	\$11.20	\$191.70
Assessment on \$207,700 property	\$208.1154	\$166.7831	\$23.2644	\$398.1609

According to the 2019-2023 American Community Survey, the median home value in Hagerstown, MD is \$207,700; this gives an annual property tax of \$398.16. (The combined personal property tax rate of 4.8250 is only applicable to businesses, and the utility tax rate of 0.5600 only applies to railroads and public utilities.)

In City Code Part II, Chapter 223, Article IV, the City of Hagerstown allows tax credits for property owners who build or renovate structures for arts & entertainment purposes, who renovate single- or multi-unit residential properties, who convert multi-unit properties into single-unit residences, and who build or renovate structures that meet LEED (Leadership in Energy and Environmental Design) green building standards. However, the process of earning these tax credits may be burdensome for their benefit.

The residential rehabilitation tax credit is an abatement of the difference between pre- and post-improvement taxable value for up to five years. For example, a property worth \$100,000 whose owner spends \$25,000 on improvements and whose assessed value increases to \$150,000 only has a \$497.70 total reduction in property tax. To earn the credit though, the entire exterior and all core systems must be brought up to code, ground-floor bathrooms must be made accessible if practical, and off-street parking should be added if possible. The City should

consider loosening these program regulations, lowering the investment minimum from 25% of the property value (or \$20,000 per multifamily unit), and increasing the tax credit in order to spur improvements to its residential properties.

Washington County and the State of Maryland also offer various property tax credits for homeowners on a fixed income, seniors, renters, and disabled veterans.

6. Public Housing

Hagerstown Housing Authority

The Hagerstown Housing Authority (HHA) is an autonomous, non-profit, and private housing agency created in 1949 to address the need for low-income housing. According to the HHA mission statement, “The Hagerstown Housing Authority is committed to providing quality, affordable housing in a safe environment. Through partnerships with our residents and other groups, we will provide opportunities for those we serve to become self-sufficient.”

As of its FY 2024 Annual PHA Plan, Hagerstown Housing Authority owns and manages 1,317 units of public housing. HHA also subsidizes the rental of approximately 944 dwelling units in the private market under the Section 8 Housing Voucher Program, 59 units through the Veterans Affairs Supportive Housing (VASH) voucher program, and one (1) Foster Youth Initiative voucher.

The Hagerstown Housing Authority owns the following housing stock:

- 0 bedroom (studio/efficiency): 199
- 1 bedroom: 412
- 2 bedrooms: 331
- 3 bedrooms: 321
- 4 bedrooms: 47
- 5 bedrooms: 7
- **Total: 1,317**

The HHA waitlist is as follows:

Public Housing/LIHTC: 10,533

- By bedroom:
 - 0 bedroom: 494

- 1 bedroom: 2,865
- 2 bedroom: 3,471
- 3 bedroom: 2,657
- 4 bedroom: 922
- 5 bedroom: 94
- By income level:
 - Extremely low income:
 - Very low income:
 - Low income:
- By race or ethnicity:
 - White
 - Black or African American
 - Asian or Other
 - Hispanic

Project-Based Voucher/LIHTC: 5,993

Housing Choice Voucher: 10,815

Total: 27,341

The HHA Public Housing waitlist has never been closed. Their Housing Choice Voucher waitlist was reopened on June 15, 2018, after being closed since May 31, 2015.

The Housing Authority's policy is to make 5% of units fully accessible with 2% designed for the hearing and/or vision impaired. The goal for visitability is 100% of units having a ground floor.

The following are identified by the Hagerstown Housing Authority's PHA FY 2020-2024 5-Year Agency Plan as its goals to address the needs of its tenants in Public Housing and Section 8 housing. These goals are designed to identify gaps in services for families, seniors, and persons with disabilities, and close these gaps by providing and coordinating the delivery of quality services and resources to residents.

- I. Invest in staff training and education, employee development, and management tools to improve agency operations, foster innovation and leadership
 - Identify opportunities for streamlining and clarification.

- Prepare staff training and development plan for each position.
- Develop a succession plan for retiring senior staff.
- II. Ensure Equal Opportunity and Affirmatively Further Fair Housing
 - Undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion national origin, sex, familial status, sexual orientation, gender identity, marital status and disability.
 - Undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion national origin, sex, familial status, sexual orientation, gender identity, marital status and disability.
- III. Utilize our current community partners to assist in the development of an Envision Center Demonstration
- IV. Enhance Rental Assistance – Streamline Operations
 - Waitlist
 - Centralize Waitlist to eradicate the need for multiple Waitlist Administrators.
 - Market Rate units
 - Obtain market rate units that help provide alternate housing options for waitlist applicants.
 - Establish relationship with sister agencies to assist in housing those with alternate needs.
 - Promote those with a voucher in need of good housing to utilize vouchers at Market Rate units.
 - Redevelopment
 - Noland Village
 - Complete and occupy McCleary Hill Phase I.
 - Complete and occupy McCleary Hill Phase II.
 - Investigate redevelopment opportunities for Noland Village redevelopment Phases III.
 - Provide applications to DHCD for funding to substantially rehab 80 townhomes at Noland Village.
 - Applicant Screening Processes
 - Review and refine applicant screening systems.
- V. Use technology to improve client service, be more efficient, and promote Housing Authority programs

- Utilize software and other technology to allow residents more options to interact with the agency via the internet and mobile devices.
 - Implemented Yardi Document Management software to employ paperless processing and archiving in our current Housing Management Software.
 - Ensure the Authority remains current with technology to improve operations if financially possible.
 - Implement the barcoding of inventory and fixed assets for better tracking of agency assets.
 - Continually update IT policies and procedures to ensure the confidentiality, integrity, and accuracy of the Housing Authority's data.
 - Implement cloud and mobile devices and software to provide the agency with more flexibility and mobility to accomplish our mission.
 - Consolidate the number of hardware devices utilized by HHA to increase efficiency, provide better data security and reduce cost.
 - Establish an Electronic Intake system.
 - Establish an Electronic Annual and Interim recertification system.
 - Develop methods for obtaining tenant photos and attaching to electronic tenant files.
 - Streamlined Phone System by implementing Avaya Cloud Office providing agency staff additional ways to communicate with residents and applicants via text messaging and allowing for remote telephone operations.
 - Security Cameras – Gateway Crossing
 - Upgrade security cameras at Elgin Station
 - Install security cameras at Gateway Crossing maintenance
 - Install security cameras at Potomac Towers
 - Install security cameras at Frederick Manor
 - Install security cameras at Walnut Towers
 - Upgrade/Install security systems at Park and Douglas Court
- VI. Promote the safety and peaceful enjoyment of residents by assuring that residents are in compliance with the lease obligations that 1) prohibit criminal activity, 2) relate to peaceful living in a community environment, and 3) prohibit unauthorized residents.

- After an initiating Incident, meet with the affected resident to allow explanation and to reiterate lease obligations.
 - Communicate with other Departments regarding residents who may be in violation.
 - Utilize the imaging system to collect and organize documentation for the resident's case file.
 - Present resident cases to the in-house committee responsible for determining whether a resident will receive an eviction notice.
 - Assist and participate in the administrative eviction process, i.e., in-house and court hearings, etc.
 - Continue looking for safety and security grants to continue security enhancements to the properties throughout the HHA.
 - Expand the current camera network.
 - Installation of security picket style fencing around strategic areas of HHA properties to increase access control and safety of the tenants and property.
 - Add expertise to future development using CPTED strategies (Choice Neighborhood and Martin Heights)
- VII. Maintain the Authority owned and managed properties and buildings in good repair and appearance to attract potential residents to the Community insuring 100% occupancy.
- AMP 1: Parkside Homes, Frederick Manor, Douglass Court, Scattered Sites, 6-009 and 6-010
 - Completed Exterior aluminum siding, caulking and painting at Scattered Sites 6-009 and 6-010
 - Roof replacement at Scattered Sites, 6-009 and 6-010
 - Kitchen upgrades at Scattered Sites, 6-009 and 6-010
 - Furnace upgrades, as needed at Parkside Homes, Frederick Manor and Douglass Court
 - Furnace upgrades at Scattered Sites 6-009 and 6-010 by Weather Program
 - Interior LED lighting upgrades at Parkside Homes and Douglass Court
 - Investigate domestic water line upgrades (in and/or connected to units) at Douglass Court
 - Common areas community buildings upgrades as needed at Parkside and Douglass Court

- Exterior entry doors at Scattered Sites 6-010
 - Investigate exterior fences, grounds, concrete walks, signage and mailboxes at Parkside Homes
- Investigate sanitary systems, electric branch panels, wiring, gas meters, interior stairs, walls, ceilings and doors at Parkside Homes
- Investigating upgrades to exterior electric meters at Douglass Court
- New A/C at Frederick Manor Community Building
- AMP 2: Walnut Towers
 - Updated Apartment Security Access and Deadbolts
 - Elevator upgrades at Walnut Towers and continue
 - Investigate Solar – (Is the solar system safe to use? Safe to remove?)
 - Roof replacement at ‘A’ & ‘B’ Building
 - Walnut Tower Store
- AMP 3: Noland Village
 - Roof upgrades, as needed at Noland Village
 - Investigate and upgrade, if possible
 - Parking lots, signage, storage sheds, grounds, sidewalk upgrades
 - Replacement windows, patios, porches, sliding glass doors
 - Caulking, painting, exterior lighting upgrade (LED)
 - Kitchen and Bathroom upgrades
 - Interior LED lighting upgrade
 - VCT & Base upgrades
 - Upgrade common areas, as needed
- AMP 4: Potomac Towers (North and South)
 - Replacement of PTS elevator in process
 - Trash compactor upgrades
 - Switch gear, electrical and lighting equipment upgrades at PTS
 - Common areas furniture and artwork upgrades
 - Kitchen, bathroom, VCT & base and interior lighting upgrades at PTN and PTS

- Community Room upgrades to include new flooring, paint, and ceiling
 - Potomac Tower Ventilation upgrades in process
 - Replacement slider door in process
 - Gateway Crossing – Phase I, II, III & IV
 - Window upgrades at all phases
 - Storage room door trim upgrade at all phases
 - Blinds, carpet and exterior painting at Phase IV units
 - Carpet, VCT upgrade at Phases I, II, & III
 - Furnaces and water heaters as needed
 - C. Williams Brooks Building
 - Miscellaneous improvements as needed
 - Obtain quotes common area floor tile replacement
 - Obtain quotes common area furniture
 - All AMPS including Gateway Crossing and C. Williams Brooks
 - Annual miscellaneous improvements including site furniture, asphalt sealing, concrete, landscaping and tree pruning, removal and new trees
 - Energy efficient upgrades site improvements, dwelling structures and non-dwelling structures
- VIII. Promote Self Sufficiency and community awareness within the Authority's Communities Objectives:
- Apply for funding to offer additional services for residents.
 - Continue FSS Program by applying for grants when available.
 - Actively participate in the FSS Maryland FSS round table.
 - Promote the Family Self-Sufficiency program through new move ins and post occupancy home visits.
 - Promote homeownership opportunities to the residents through local banks, and programs such as Habitat for Humanity and Rural Development.
 - Explore HUD's Envision Center; present the concept to the Program Coordinating Committee.
 - Create relationships with local banks to development additional support, training, and resources for the residents.
 - Implement HCV Homeownership Program
 - Establish educational opportunities through local agencies.
 - Promote all activities through a newsletter, flyers and/or Facebook event.

- Utilize the Tenant Portal and email to advise residents of upcoming events.
- Utilize text message systems to advise residents of emergencies and upcoming meetings and events.
- Seek homeownership opportunities for participants on the HCV Homeownership waitlist.
- Assist current FSS participants complete goals with available forfeited funds when available.

IX. Implement the requirements of the Violence Against Women Act (VAWA)

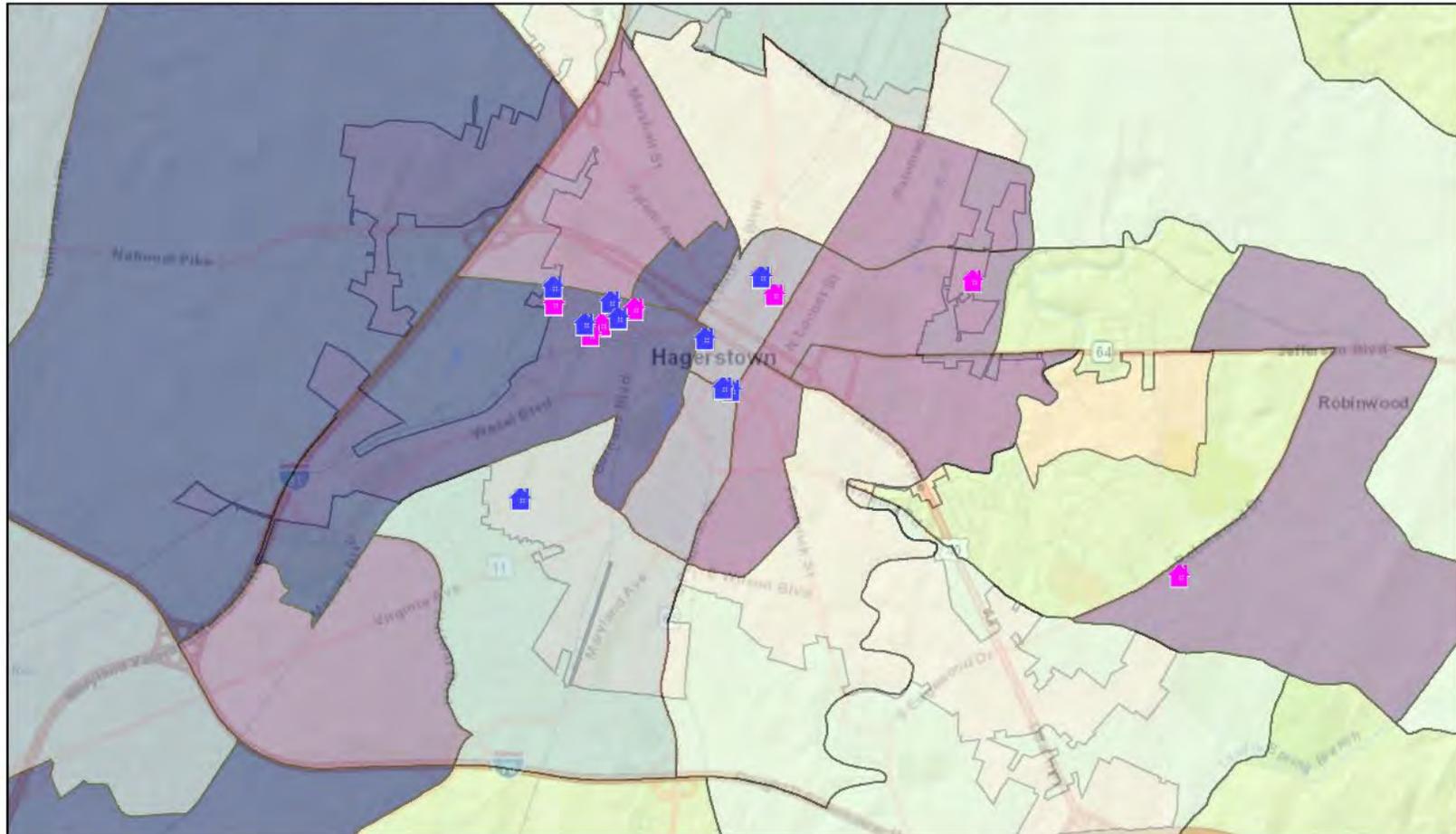
The HHA will exercise its right to act in accordance with the Violence Against Women Act and Department of Justice Act of 2005, as amended, which prevents the removal of assistance from certain persons living in Public Housing or receiving Housing Choice Voucher assistance if the asserted grounds for such action is an instance of domestic violence, dating violence, sexual assault, or stalking.

- Protect victims of domestic violence, dating violence, sexual assault, or stalking (in addition to members of the victims' immediate families) from losing their HUD-assisted housing because of being a victim of domestic violence.
- Undertake affirmative measures to make tenants participating in the Public Housing and Housing Choice Voucher programs aware of VAWA requirements.
- Undertake affirmative measures to make owners participating in the Housing Choice Voucher program aware of VAWA requirements.

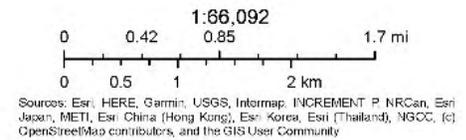
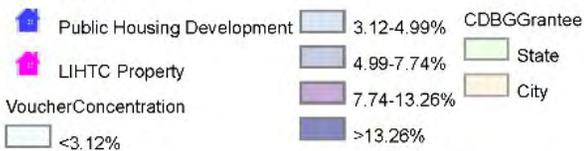
To meet this goal, the denial of assistance to an applicant or termination of assistance of a participant for criminal activity are subject to the provisions of the Violence Against Women Act of 2005, as amended, and reviewed on a case-by-case basis.

The map below illustrates Public Housing developments, LIHTC properties, and concentration of Section 8 voucher usage by Census Tract in the City of Hagerstown:

City of Hagerstown, Washington County, MD - Public Housing, LIHTC, and Voucher Concentration



April 2, 2025



The Hagerstown Housing Authority is not rated as a “troubled” agency by HUD.

The Hagerstown Housing Authority is improving its self-sufficiency programming by applying for funds to offer additional services to residents, complete home visits through new move ins and post occupancy home visits, promoting homeownership opportunities through partnerships with local banks and partners such as Habitat for Humanity, and partnering with local agencies for financial literacy programming, computer literacy and other educational opportunities.

The Housing Authority also offers training and educational opportunities to its employees. Residents and employees are encouraged to participate in the Citizen’s Police Academy to facilitate and build and understanding of what the Police Department does for the community. Residents and staff also participate in several committees including by not limited to: Boys and Girls Club, FSS Program Coordinating, Executive, and Maryland State Round Table Committee, Character County, Washington County Homeless Coalition, among others.

According to the Housing Authority’s Agency Plan, the housing authority is able to house those applicants with disabilities in a reasonable time and has experienced no problems with finding units that fit the accessibility needs of the disabled.

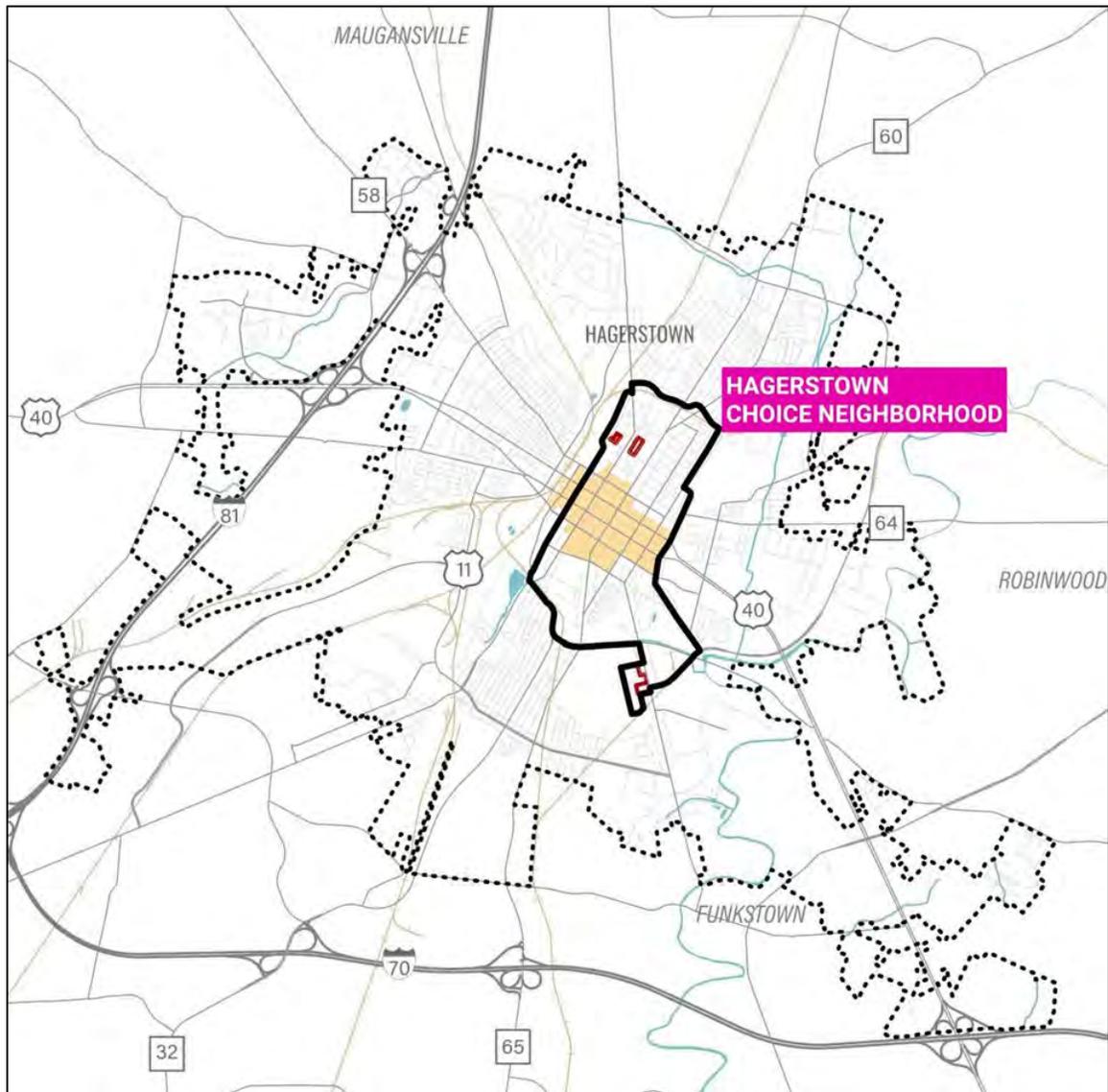
The Housing Authority’s operating budget provides funds for routine maintenance and operating costs. It also obtains an annual grant from HUD through the Capital Fund Program (CFP) for capital improvements and renovation costs. The CFP funds include the construction of capital maintenance initiatives identified in the Housing Authority’s Five-Year Plan, and implementation of the agency’s Section 504 handicap accessibility improvements. The Housing Authority’s FFY 2024 Statement of Financial Resources is as follows:



Table IV-10 – Hagerstown Housing Authority 2024 Statement of Financial Resources

	Sources	Planned \$	Planned Uses
1.	Federal Grants		
a)	Public Housing Operating Fund – CY2024	\$3,189,345.14	PH Operations
b)	Public Housing Capital Fund – 2024	\$2,947,344.00	PH Capital Improvements
c)	Annual contributions for Section 8 Tenant Based Assistance	\$8,276,441.00	Section 8 Vouchers
d)	Annual contributions for Section 8 Project Based Assistance	\$119,756.00	Section 8 Project
e)	Resident Opportunity and Self Sufficiency Grants	\$279,881.00	PH Supportive Services
f)	HCV FSS Coordinator Grant	\$0.00	S8 Supportive Services
g)	Section 8 Admin Fees	\$788,278.04	S8 Administration
2.	Prior Year Federal Grants (unobligated funds only)		
	MD06P006501-22	\$1,233,903.89	PH Capital Improvements
	MD06P006501-23	\$2,754,997.00	PH Capital Improvements
	MD3B006CNP123	\$500,000.00	Choice Neighborhood
3.	Public Housing Dwelling Rental Income		
	Rents	\$3,253,000.00	PH Operations
	Excess Utilities	\$38,750.00	PH Operations
4.	Other Income (list below)		
	Interest Income	\$110,000.00	PH Operations
5.	Non-Federal Sources (list below)		
	Non-Dwelling Rental	\$9,600.00	PH Operations
	Roof Top Income	\$153,000.00	PH Operations
	Management Fees GWC	\$202,084.00	PH Operations
	Management Fees CWB	\$41,810.00	PH Operations
	Management Fees McH	\$108,000.00	PH Operations
	Total Resources	\$24,006,190.07	

Hagerstown Choice Neighborhood Initiative



In cooperation with the City of Hagerstown, the Hagerstown Housing Authority received a planning grant for the HUD Choice Neighborhoods Initiative (CNI) program, focusing on creating vibrant, thriving, and connected neighborhoods. HHA began the planning process in 2023 and has already identified existing conditions, conducted a needs assessment and market study, and held community engagement meetings & workshops. This has helped to develop HHA's Choice Housing Transformation Plan, Choice Neighborhood Transformation Plan, and Choice People Transformation Plan.

Housing Authority of Washington County

The Housing Authority of Washington County (HAWC) sees to the needs of low-income residents of the County outside of Hagerstown's corporate limits. It owns or manages over 300 rental units, including six senior communities, and administers Housing Choice Vouchers for low-income families, seniors, and persons with disabilities to obtain market-rate rental housing. Though this organization does not provide housing within the City of Hagerstown, it does contribute additional public housing and housing assistance and relieve housing pressures.

7. Comprehensive Plan

VisionHagerstown 2035 is the City of Hagerstown's update to the City's 2008 Comprehensive Plan and provides a roadmap for how the City should plan for growth over the next twenty years. The plan covers several topics including Land Use, Transportation, Housing, Community Facilities, Water Resources, Economic Development, and Environmental Resources. Much of the comprehensive plan incorporates existing plans that have been vetted through the community including the 2012 Sustainable Community Plan and the community's City Center Plan.

The City solicited public and stakeholder input through meetings, and an online survey which was marketed to the community as a whole, and public meetings held by the Planning Commission, Mayor, and City Council. The City received over 1,300 responses from the public to five surveys in early 2017. The City also received input during the State clearinghouse review from the Maryland Department of Planning, Maryland Historical Trust, Maryland Department of the Environment, and State Highway Administration. The Planning Commission took the State's comments under advisement and revised the draft document to incorporate this input as deemed appropriate.

The *VisionHagerstown 2035* plan outlines strategies to address the relationship between planned growth and the infrastructure needed to accommodate it. Major themes include:

- **Growth Management and Land Use** - the City identifies as a medium-range growth area (MRGA). The plan recommends realignment of the MRGA to capture areas and development that the City utilities are

obligated to serve (such as areas along Sharpsburg Pike south of Interstate 70). Additionally, it recommends to guide the location of higher wage employers and high quality new residential developments to the City to enhance and broaden the City's economic base.

- **Revitalization of Downtown** - The plan recommends pursuing feasible revitalization projects that have the potential to spur redevelopment, such as areas identified in the Community's City Center Plan. Emphasis is placed on revitalization of the downtown through the attraction of market rate housing, office development and recruitment, heritage tourism, arts and entertainment activities and student housing support for the University System of Maryland-Hagerstown.
- **Water Resources** - The Plan recognizes the City's need to obtain additional water supply as well as to closely monitor the City's and County's wastewater treatment capacity and establishes policies to guide the future extension of these services. The plan also recognizes issues with non-point sources of nutrient pollution such as stormwater runoff from roads and lawns, and sediment from construction, agricultural runoff etc. The 2007 Maryland Stormwater Management Act, passed by the General Assembly, mandated substantial revision of the Stormwater Design Manual. Although the City intends to comply with the 2007 Act, there are substantial concerns that the 2007 Stormwater Act and subsequent guidance published by MDE may inhibit redevelopment in Hagerstown. While the City appreciates and supports the state's overall intention of reducing nonpoint source pollution of the Chesapeake Bay and its tributaries, it is the City's contention that some reduction of nutrients and other pollutants (as would be achieved with less stringent stormwater requirements) is preferable to no improvement at all.
- **Transportation**- the Hagerstown-Eastern Panhandle Metropolitan Planning Organization Long Range Transportation Plan lists locally recommended transportation improvements that are needed to serve the community and support land use policies.
- **Housing and Neighborhood Revitalization** - there is a need for future growth in undeveloped areas around the City, however, the City recognizes that need to have quality existing neighborhoods and stable home values The City has established a vision and commitment to housing and neighborhoods that includes making them safe, clean, and welcoming, creating a sense of community identity, and making sure that they have amenities and are walkable.

- **Enhancement of Parks and Recreation Opportunities** - The Plan recommends strategies to gain additional open space for parks in underserved neighborhoods, as well as natural buffers and strategies to improve public access to and enjoyment of Antietam Creek and Marsh Run.
- **Environmental Resources** - The Plan recognizes the importance of becoming a more sustainable community and protecting water and air quality. Goals of the Plan will include reducing greenhouse gas emissions, improving local water resources, and encouraging green and sustainable infrastructure.

VisionHagerstown 2035 has been amended twice since it was adopted, first in 2019 and again in 2022. The 2019 amendment recognized the annexation of Foggy Bottom Farm and Antietam Creek bed, as well as updating the compatible zoning districts of the Institutional and the Parks, Recreation & Open Space land use designations. 2022's amendment was more in-depth and addressed the transportation element of the plan, including recommendations on specific road & pedestrian improvements.

There were also two comprehensive rezonings, in 2019 and in 2023. The first rezoning implemented the new Institutional (INST) zone on schools, parks, government properties, and other institutional uses. In 2022, staff discovered eight properties that were inadvertently left out of the Institutional zone rezonings and two other museum properties that made sense to be rezoned INST. In all, 35 properties were affected in 2019 and another 10 in 2023.

8. Transportation

One of Hagerstown's nicknames is "the Hub City", based on its location at the intersection of the Great Indian Warpath and the National Road. The City continues to earn its nickname as a transportation center at the intersection of Interstate Highways 81 and 70 and a major waypoint along the CSX and Norfolk Southern Railroads. Following is a discussion of the City's public transit, place in the Maryland State Transportation Plan, and other forms of transportation in and around Hagerstown.

Public Transit

The Washington County Transit Department (WCT) operates all of the public

transit in Washington County providing safe, affordable, dependable and accessible mass transportation that enhances the mobility of its customers. The system runs eight fixed urban routes that originate in Hagerstown and offers services to Funkstown, Halfway, Long Meadow, Maugansville, Robinwood, Smithsburg and Williamsport. In addition, WCT provides transportation for the elderly and persons with disabilities through a ride assist voucher program, which is funded by the Statewide Special Transportation Assistance Program (SSTAP) and ADA Complementary Paratransit Service for individuals with disabilities who cannot access fixed-route service. WCT also operates the Job Opportunity Access Program (JOBS) in cooperation with the Washington County Department of Social Services (WCDSS). The urbanized fixed-route service carries the majority of the County's ridership. Total ridership averages over 516,000 passenger trips and all vehicles travel over 500,000 miles annually. WCT operates Monday-Saturday.

All transit buses operated by WCT are lift ramp-equipped and have two wheelchair securement positions on board. Fixed route buses are also equipped with a "kneeler" feature which allows the bus to lower making the step from the curb to the bus easier. All transit buses are equipped with seating designated as "Priority seating for the disabled".

Fares for the WCT system are as follows:

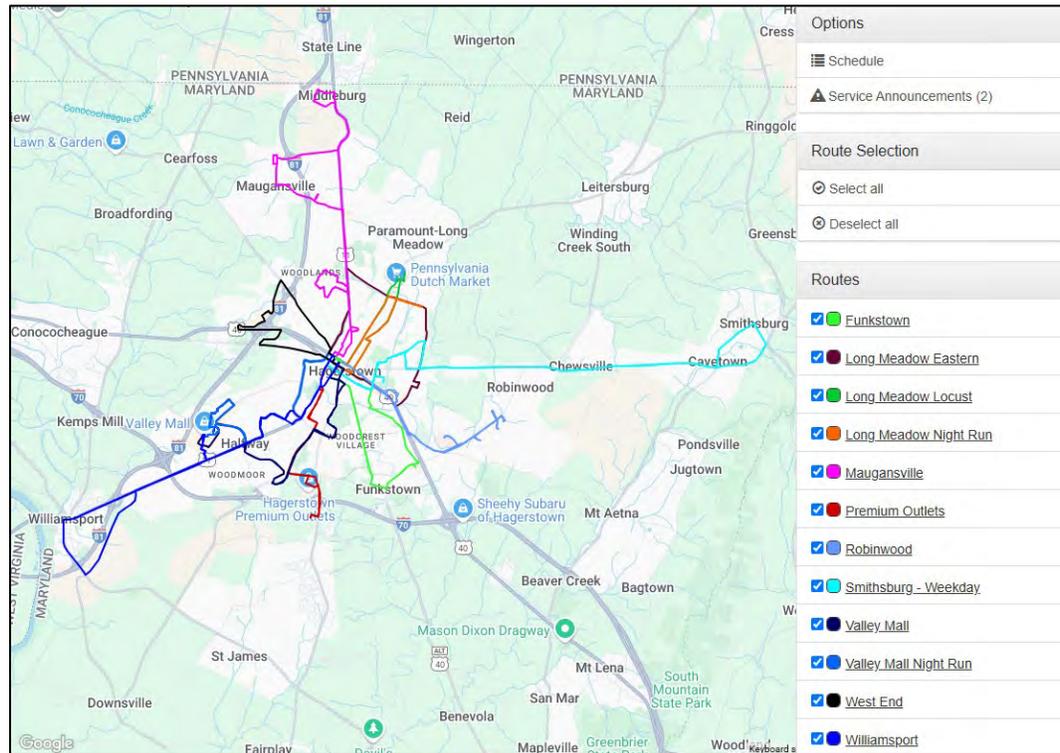
- One-way base fare (Adults 18-59): \$1.25
- Senior (60+)/Disabled: Peak: \$0.95, Off Peak: \$0.60
- Student (5-17) (18+ with valid school ID): \$0.85
- Children Under 5: Free

WCT also offers 20-ride cards and monthly, six-month, and annual passes. Reduced prices are available for seniors, people with disabilities, and students.

In addition to its fixed-route County Commuter buses, WCT also operates demand-response Complementary Paratransit and Ride Assist. ADA Complementary Paratransit is intended for persons who have been certified as not able to use fixed-route transportation. Users must prove their eligibility due to needing special accessibility accommodation and can ride the system for a flat fare of \$2, along with a personal care attendant for free. In contrast, the Ride Assist Program is intended for persons aged 60 or over and/or persons with disabilities who, for one or more reasons, cannot utilize the Washington County Transit fixed-route buses and who have applied to WCT to participate. These rides

are paid by vouchers that the rider purchases in advance and are provided by outside service providers.

The **map below** indicates the transit service lines that run through and around the City of Hagerstown and Washington County:



Additionally, the Maryland Transit Authority offers commuter service to the Washington, DC area, connecting with the WMATA Red Line at Shady Grove, MD and terminating in Bethesda, MD. This coach service along Interstates 70 and 270 benefits persons who want the advantages of living further from Washington but still work in and around the DC area.

Fares

Fares are charged based on travel as listed below:

- Hagerstown to Rock Spring - Zone 5
- Hagerstown to Shady Grove - Zone 4
- Shady Grove to Rock Spring - Zone 4
- Myersville to Shady Grove - Zone 3
- Shady Grove to Rock Spring - Zone 2

	Zone 2	Zone 3	Zone 4	Zone 5
One Way - Full Fare	\$5.00	\$6.00	\$7.00	\$8.00
One Way - Senior/Disability Fare	\$4.00	\$5.00	\$6.00	\$7.00
Tap Trip - Full Fare	\$2.00	\$3.00	\$4.00	\$5.00
Tap Trip - Senior/Disability	\$1.50	\$2.00	\$3.00	\$4.00
Monthly Pass Full Fare	\$170.00	\$204.00	\$238.00	\$272.00
Monthly Pass - Senior/Disability	\$126.00	\$150.00	\$174.00	\$208.00
Transit Link Card	(refer to commuterdetails.com for pricing)			

Commuter Bus Ticket Sales:
Commuter Direct
Website: MTA.CommuterDirect.com
Phone: 410-687-0212
Charm Press (mobile ticket)
Website: www.mta.com/charmpress
Phone: 833-542-7622
Email: MTACommuterDirect@mdot.maryland.gov

- Only each one-way fare, using exact change may be purchased on the bus. No change will be given if you overpay.
- Senior tickets and monthly passes can be purchased from Commuter Direct. One-way fares and monthly passes can be purchased via CharmPress mobile ticket app.
- Reduced fares are available for senior citizens (65+), persons with disabilities, and Medicare Cardholders. To be eligible, you must show one of the following: a valid MTA Senior/Disability photo ID card, or any valid government issued photo ID with proof of age, or a valid disability ID from another transit agency with any valid government issued photo ID, or a Medicare card with any valid government photo ID.
- Transit Link Cards allow for unlimited use of MTA Commuter Bus (up to the indicated zones), Metrolink, Metrolink, and Ride-On during the indicated months.

MTA Telephone Numbers

Information: (410) 528-9000 or 1 (866) RIDE-MTA
Internet Address: www.mta.maryland.gov
E-Mail Contact Line: commuterdirect@mta.maryland.gov
TTY (hearing/voice impaired): (410) 528-3387
Disability Assistance: (1) 800-238-2827
Commuter Choice Maryland Info: (410) 865-1100

Other Telephone Numbers

Atlantic Coast Charters (443) 864-2026
MDOT (410) 528-9000
Montgomery County Ride-On (301) 777-2433
Frederick County Transit (301) 662-2982
Frederick Commuter Assistance (301) 631-3943
Commuter Direct (410) 687-0212

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14001 AND 110400 AUMWELFARE
#18 Road Street
Baltimore, Maryland 21202-2654
www.mdt.maryland.gov

505 EFFECTIVE JULY 1, 2024
COMMUTER BUS
MARYLAND TRANSIT ADMINISTRATION
HAGERSTOWN/MYERSVILLE TO SHADY GROVE/ROCK SPRING BUS PARK
WEEKDAY SERVICE FROM 4:30 A.M. TO 8:09 P.M.
EXPRESS SERVICE VIA I-70 AND I-270 TO:
HAGERSTOWN MVA
MYERSVILLE P&R
ROCK SPRING BUSINESS PARK
ATLANTIC COAST CHARTERS (443) 864-7029
MDOT MARYLAND DEPARTMENT OF TRANSPORTATION
YOUR RIDE IS HERE. MARYLAND TRANSIT ADMINISTRATION

Regional Transportation Planning

The *VisionHagerstown 2035* plan has identified that the growth and sustainability of Hagerstown relies on making Hagerstown a desirable place to live, work, and visit. Priorities for road projects that add highway capacity, and other improvements to transportation such as transit, pedestrian and bicycle facilities have been considered as part of the plan. The goal is for these different transportation methods to meet the mobility needs of residents, business, and visitors of all ages, abilities, and socioeconomic backgrounds.

The Hagerstown/Eastern Panhandle Metropolitan Planning Organization (HEPMPO) is the federally designated body responsible for preparing a Long-Range Transportation Plan (LRTP) to assess transportation needs of the region that includes Washington County, Maryland and Berkeley and Jefferson Counties, West Virginia through the year 2040. This plan is known as *Direction 2040*, and the long-range transportation plan update found that the Hagerstown/Eastern Panhandle region will experience a 32% increase in travel demand by 2040. Maintaining capacity on interstates is critical for the long-term adequacy of Hagerstown's transportation system. Heavy congestion on the interstates will make Hagerstown's thoroughfares and local roads attractive alternative routes for regional through traffic.

State Transportation Planning

Every five years, Maryland law requires that the Maryland Department of Transportation update its long-range transportation plan. Accordingly, in January 2024 MDOT published its 2050 Maryland Transportation Plan, "The Playbook". According to the document's introduction, the Playbook will improve how the State, its businesses and its residents move goods and connect people to the places where they live, work and play.

Guiding Principles are concepts that will guide MDOT in its decision-making process to support the State's goals for the transportation system in Maryland.

- **Equity:** Integrate equity considerations in all aspects of transportation planning, programming, and operational processes.
- **Preservation:** Preserve the condition of the existing transportation system assets to provide safe and efficient movement.

- **Resilience:** Improve the transportation system’s ability to provide reliable service throughout natural weather events and man-made threats.
- **Modernization:** Transform the transportation system by using proven technological improvements and exploring innovative new ideas.
- **Experience:** Improve the experience of all transportation system users.

Goals show, at the highest level, what MDOT plans to do by 2050. Together with the guiding principles they produce a vision of how the transportation system will serve Maryland, and the key outcomes MDOT desires for Maryland.

- **Enhance Safety and Security:** By protecting the safety of all residents, workers, and visitors, Maryland will achieve zero traffic-related fatalities and serious injuries.
- **Deliver System Quality:** By investing to achieve system quality, MDOT will create an infrastructure program that is financially sustainable, environmentally resilient, and in a state of good repair.
- **Serve Communities and Support the Economy:** By expanding transportation options to allow Maryland’s diverse communities to access opportunities and to support the movement of goods, MDOT will expand transit and active transportation use, and bolster the State’s economy.
- **Promote Environmental Stewardship:** By minimizing and mitigating the environmental effects of transportation, Maryland will achieve a 20 percent reduction from 2019 in vehicle miles traveled (VMT) per capita by 2050, a 40 percent reduction in on-road transportation sector greenhouse gas (GHG) emissions by 2031 and move towards net-zero by 2045.

The Playbook is informed by and will inform future versions of the following MDOT modal administration plans: State Rail Plan, State Freight Plan, Bicycle and Pedestrian Master Plan, Zero Emission Bus Transition Act Legislative Report, State Zero Emission Vehicle Infrastructure Plan, Greenhouse Gas Reduction Act Plan, MAA Strategic Plan, MPA Strategic Plan, Strategic Highway Safety Plan, Strategic Asset Management Plan, Asset Management Plan, Shared Mobility Work Plan, Maryland Statewide Transit Plan, MARC Growth Transformation Plan and Connected & Automated Vehicle Strategic Framework. The Playbook is also informed by the WMATA Strategic Transformation Plan and the Moore-Miller Administration Guidance, MPO plans, long range plans from peer states, federal requirements, state priorities, public input, and stakeholder concerns.

In terms of projects directly called out in the Playbook as “game changing”, the I-81 Phase 2 Corridor Expansion is the most directly relevant to the Hagerstown area. The 12.1 miles of Interstate 81 through Maryland is only four lanes wide but is within the national top one percent of freight volume by lane-mile but has experienced a 70 percent increase in vehicle crashes and a 192 percent increase in truck crashes between 2011 and 2017. The four-phase I-81 Corridor Expansion will widen the highway to six lanes and improve interchanges, including the major interchanges with I-70, US 40, US 11, and Halfway Boulevard. This will improve the flow of traffic to both national destinations and to the major businesses and distribution centers in and around Hagerstown. For the 26% of Washington County residents (including a large number of Hagerstown residents) whose jobs are directly affected by the transportation and logistics industry, as well as local residents and visitors traveling northeast and southwest, the Phase 2 Corridor Expansion will help improve Hagerstown’s economy and standard of life.

Hagerstown is also highlighted as a case study in the Statewide Bicycle and Pedestrian Plan, section 4.3, of how to implement MDOT’s Equity Need index to improve pedestrian infrastructure. In Hagerstown specifically, the plan highlights a high need for shared-use paths and documented ADA-compliant sidewalks in the City’s outlying areas and a low to moderate need along the US 40/National Pike corridor as part of the State’s Complete Streets plans.

The City of Hagerstown will continue to work with Washington County and the municipalities within the County, the State of Maryland, and the Hagerstown Eastern Panhandle Metropolitan Planning Organization (HEPMPO) to pursue the timely completion of selected projects that facilitate traffic movement around the City’s periphery and increase the safety of roadways within the City. Specific projects are:

- Widening of I-81 and I-70, with bridge replacement when necessary.
- Widening and extension of Eastern Boulevard from MD 60 Leitersburg Pike to MD 64 Jefferson Boulevard.
- Extension of Halfway Boulevard from New Gate Boulevard to MD 63 Greencastle Pike.
- Pedestrian Safety Action Plan (PSAP) improvements to US 40 Dual Highway.

These and future transportation improvements will support *VisionHagerstown 2035* growth management and land use goals.

The public and stakeholders also contributed opinions and information regarding the City's transportation system and network. It was identified that while the public often likes individual bus drivers, public transportation as a whole is inadequate in both frequency and service hours. For those who work second or third shift at the warehouse parks, there are few inexpensive, timely and reliable options. Bike infrastructure is needed for residents (especially youth) to access work, education and shopping destinations, but the community is divided on their impact on traffic.

Other Transportation

Interstate 70 stretches from Baltimore, MD to Utah through cities such as Columbus, Indianapolis, St. Louis, Kansas City, and Denver. It is heavily used by residents to travel east to Baltimore and to Washington, DC via I-270; to the west it links Maryland with western Pennsylvania, the Rust Belt, Chicago and points west. Interstate 81 is a major freight corridor between the Northeastern and Southeastern states, as well as a bypass of crowded I-95. It directly links Hagerstown with Harrisburg and Martinsburg, and can be used to access New York City, Philadelphia, Charlotte, and other major cities.

From Hagerstown, there is daily bus service to Frederick, Silver Spring, and Baltimore, MD, from where travelers can connect to destinations throughout the region and country. The nearest MARC commuter train stations are in Frederick, MD and Martinsburg, WV, and the nearest Amtrak train station is in Martinsburg.

Hagerstown Regional Airport (HGR) offers year-round service to Orlando-Sanford and seasonal service to St. Petersburg/Clearwater and Myrtle Beach. Washington-Dulles International Airport (IAD) is 65 miles away in northern Virginia, and Washington-Reagan National Airport (DCA) and Baltimore-Washington International Airport (BWI) are both 75 miles distant from Hagerstown.

9. Education

Education is often an important factor influencing where people choose to live. According to the 2019-2023 American Community Survey, 16.6% of the population age 25 years and over have less than a high school education (or equivalent) in the City of Hagerstown; 35.7% have obtained a high school diploma or equivalent; and 19.7% have a bachelor's degree or higher.

Hagerstown and its surrounding towns are served by



Washington County Public Schools. The District has 44 public schools: twenty-five (25) elementary schools; seven (7) middle schools; nine (9) high schools; and three (3) special programs: Claude E. Kitchen Outdoor School at Fairview, InnovatED Learning Center (formerly the Antietam Academy), and the Marshall Street School/Job Development Program. According to the Maryland State Department of Education, the district has a student enrollment of 22,549 for the 2024-2025 school year, and as of March 2025 the District website shows a workforce of 3,699 employees (1,436 education support, 1,986 teachers, and 277 administration). As of the 2023-2024 school year, WCPS has a per-pupil district-wide cost of \$464 in Federal funding and \$1,728 in state and local funding for a total of \$2,192.

In its strategic plan entitled *Your Journey, Our Commitment*, Washington County Public School System identified the following four goals:

- **STUDENT SUCCESS:**

WCPS aims to engage each student in authentic, rigorous learning experiences to prepare them with the skills, knowledge, and habits to maximize their success. The goals include increasing kindergarten readiness as well as college and career readiness, enhancing intervention and support, and boosting student involvement in extracurricular activities to create a greater sense of belonging for each student.

- ***Kindergarten Readiness:*** Increase the percentage of students entering kindergarten ready to learn as measured by the MSDE readiness assessment.

- KRA: by at least a X*% increase from the baseline year by the end of the 2029-2030 school year in the students entering Kindergarten ready to learn.
 - **Meeting Grade Level Standards – Intervention and Support:** Increase the number of K-10 students meeting grade level expectations in core instruction in literacy and math.
 - ELA: 30% increase by the end of the 2029-2030 school year in the number of students K-10 meeting grade level expectations in core instruction in literacy.
 - Math: 100% increase by the end of the 2029-2030 school year in the number of students K-10 meeting grade level expectations in core instruction in math.
 - **College & Career Readiness:** Increase the rate of 11th and 12th grade students meeting the CCR standards in ELA and math.
 - CCR: by at least a X*% increase from the baseline year by the end of the 2029-2030 school year in the number of students who are college- and career-ready.
 - **Involvement in Extracurricular Activities:** Increase student engagement, as measured by participation in academics, sports, clubs, organizations, cultural activities, arts programs, and extracurriculars. Additionally, improve the sense of belonging.
 - By at least X*% at each elementary and secondary school from the 2024-2025 school year baseline by the end of the 2029-2030 school year.
 - Ensure that at least 90% of the students agree on the climate survey that they feel a sense of belonging in their school.
- **ACCESS AND OPPORTUNITIES:**

The district will focus on identifying and addressing barriers that impact student learning and success. Objectives include increasing pre-kindergarten enrollment, ensuring access to college and career preparation avenues, supporting student transitions, and integrating the Portrait of a Graduate competencies into the Essential Curriculum.

- **Pre-K Enrollment:** Increase Pre-Kindergarten enrollment for 3- and 4-year-olds.

- By at least 15% from the 2023-2024 baseline by the end of the 2029-2030 school year.
 - **Access to College & Career Preparation Avenues:** Ensure all graduating students complete rigorous and relevant coursework in CTE, AP, IB, and/or dual enrollment programs during their high school program of studies.
 - By the end of the 2025-2026 school year.
 - **Support For Student Transitions:** All WCPS schools will develop a comprehensive transition plan to support students and families who are transitioning from PreK to K, 5th to 6th, and 8th to 9th grade.
 - By the end of the 2025-2026 school year.
 - **Competency Development (Portrait of a Graduate):** The Portrait of a Graduate competencies will be integrated into the Essential Curriculum.
 - By the end of the 2025-2026 school year.
- **CULTURE, SAFETY, AND WELLNESS:**

WCPS is committed to creating a safe, engaging, and supportive learning environment for each student and staff member. This includes fostering a positive school culture and climate, improving student attendance, and enhancing staff recruitment and retention.

- **Safety and Well-Being:** Create a safe and supportive learning environment among students, staff, and families.
 - Each stakeholder group's responses to the WCPS climate survey results increase by at least X%* from the 2024-2025 baseline year by the end of the 2029-2030 school year.
- **School Culture and Climate:** Create a positive learning environment among students, staff, and families.
 - Each stakeholder group's responses to the MSDE Report Card Climate Survey results improve by at least X%* from the 2024-2025 baseline year by the end of the 2029-2030 school year.
- **Student Attendance:** Increase the student attendance rate in each school.
 - By at least 10% from the 2023-2024 baseline year by the end of the 2029-2030 school year.

- **Staff Recruitment & Retention:** Improve retention of supporting staff, teachers, and leaders.
 - Each year through the 2029-2030 school year, 95% of staff across the units return each year.

- **COMMUNITY ENGAGEMENT:**

The plan emphasizes the importance of partnering with caregivers and the community to develop strong, meaningful connections that support student success. Objectives include increasing family engagement, strengthening collaborations with local organizations and businesses to grow student learning opportunities, and increasing transparency and communication.

 - **Family Engagement:** Each school or program will engage with families through meetings, activities, and events in their school community.
 - At least 50% of the families in the school community by the end of the 2025-2026 school year and will increase this number by 5% each year after.
 - **Community Partnerships:** Strengthen district collaborative partnerships with local organizations and businesses.
 - By at least 25% from the 2024-2025 baseline by the end of the 2029-2030 school year.
 - **Enhanced Communications:** Increase transparency and communication with the community.
 - As evidenced by at least a X%* increase on the relevant questions in the WCPS climate survey from the 2024-2025 baseline by the end of the 2029-2030 school year

**Metrics to be determined after the 2024-2025 school year.*

Table IV-11 below compares student performance using the Maryland Comprehensive Assessment Program (MCAP) scores in the areas of reading, math, and science. English/Language Arts, and Mathematics is assessed in grades 3-8 and once in high school. For science, the Maryland Integrated Science Assessment (MISA), is administered in fifth and eighth grade and in high school every spring. The data below illustrates the percentage of student scores identified at Pass Level 3 or 4 for the 2023-2024 school year.

**Table IV-11 – Trend Data of Student Performance
(percentage of student's scores at Pass Level 3 or 4)**

	Grade/Class	Washington County School District % Pass Level (PL) 3/4	State of Maryland
English	3	47.0	46.5
	4	50.5	49.3
	5	46.3	44.2
	6	55.0	47.9
	7	54.1	48.6
	8	49.5	46.2
	English 10	64.0	55.3
	English All	53.0	-
Math	3	39.8	40.0
	4	34.0	32.8
	5	30.3	28.8
	6	22.7	19.8
	7	22.9	15.3
	8	14.8	7.0
	Algebra 1	25.2	20.0
	Algebra 2	31.4	24.0
	Geometry	10.7	21.9
	Math All	25.6	-
	Science	5	26.0
8		24.0	24.9
All High		46.1	37.3

The English language proficiency assessment is administered to multilingual learners (MLs) in grades K through 12 upon their entry into the school system (W-APT) and annually during a testing window in the second semester. The assessment measures a student's English language proficiency in the areas of listening/speaking (oral), reading/writing (literacy), and comprehension. English language proficiency is measured in six levels: entering, emerging, developing, expanding, bridging, and reaching.

Of the 1,111 multilingual students in Washington County Public Schools during the 2023-2024 school year, 10.7% were proficient in English as compared to 8.1% statewide.

The Maryland Comprehensive Assessment Program (MCAP) also addresses college readiness for secondary school graduates (or equivalent certificate). The scores are as follows:

- **SAT:**
 - Students Tested: 355 students
 - Reading and Writing Score (All Students): 557
 - Math Score (All Students): 535
 - Total Score (All Students): 1092
- **ACT:**
 - Students Tested: 30 students
 - English Score (All Students): 24
 - Math Score (All Students): 22
 - Reading Score (All Students): 25
 - Science Score (All Students): 23
 - Composite Score (All Students): 23
- **AP:**
 - Students Tested: 545 students
 - Number of Exams (All Students): 1,585 exams
 - Exams per Student (All Students): 2.9 exams
 - Mean Grade per Exam (All Students): 2.66
 - Exams with Grades 3-5 (Passing) (All Students): 842 exams
 - % Exams with Grades 3-5 (All Students): 53.1%

Private Schools

In addition to the public schools, the National Center for Education Statistics indicates that as of the 2021-2022 school year there were 14 private schools that serve Washington County, all but two of which had a Hagerstown mailing address. The majority of these are affiliated with a Christian church or denomination. Three of the 14 serve students from Pre-K through 12th grade, three of the schools are high school only, one is only preschool and kindergarten, and the others serve some combination of grades between 1st and 12th.

Post-Secondary Education

The following institutions serve the post-secondary educational needs of Hagerstown and Washington County:

- **Hagerstown Community College:** founded in 1946 as the first community college in Maryland, HCC is an accredited two-year institution whose goals include the economic development of Hagerstown and the surrounding community. As of 2023 it had 5,000 enrolled students and offers more than 100 programs of study.
- **University System of Maryland at Hagerstown:** USMH is a branch of the University System of Maryland (USM) based in the former Baldwin House Hotel in downtown Hagerstown. It boasts 44 offices, 22 classrooms, four interactive video network (IVN) classrooms, six computer labs, two nursing labs and a library/media center. USMH opened in January 2005 with three universities offering seven undergraduate and five graduate programs. Students are required to first complete their prerequisites at a two-year institution such as Hagerstown Community College, then they can apply for programs through six other USM colleges and attend classes at USMH.

10. Section 3

HUD's definition of Section 3 is:

Section 3 is a provision of the Housing and Urban Development Act of 1968. The purpose of Section 3 to ensure that employment and other economic opportunities generated by certain HUD financial assistance shall, to the greatest extent feasible, and consistent with existing Federal, State and local laws and regulations, be directed to low- and very low-income persons, particularly those who are recipients of government assistance for housing, and to business concerns which provide economic opportunities to low- and very low-income persons.

The City of Hagerstown is currently in the process of drafting its guidelines it will utilize to accomplish Section 3 compliance.

During this Analysis of Impediments study, no impediments or complaints were mentioned or filed based on Section 3 Requirements.

C. Private Sector:

The private sector has traditionally been the greatest impediment to fair housing choice in regard to discrimination in the sale, rental or advertising of dwellings, the provision of brokerage services, or in the availability of financing for real estate purchases. The Fair Housing Act prohibits such practices as the failure to give the same terms, privileges, or information, charging different fees, steering prospective buyers or renters toward a certain area or neighborhood, or using advertising that discourages prospective buyers or renters because of race, color, religion, sex, handicap, familial status or national origin.

1. Real Estate Practices

The Pen-Mar Regional Association of REALTORS® is the local organization of real estate brokers operating in Washington County, Maryland, and Franklin and Fulton Counties, Pennsylvania. The Mission of Pen-Mar REALTORS® is to enhance and empower association members through professionalism, networking, education, advocacy, and community engagement. Members are bound by the Code of Ethics of the National Association of Realtors (NAR). This Code of Ethics obligates its members to maintain professional standards including efforts to affirmatively furthering fair housing.



Article 10 under “Duties to the Public” states that: “REALTORS® shall not deny equal professional services to any person for reasons of race, color, religion, sex, handicap, familial status, national origin, sexual orientation, or gender identity.



REALTORS® shall not be parties to any plan or agreement to discriminate against a person or persons on the basis of race, color, religion, sex, handicap, familial status, national origin, sexual orientation, or gender identity. REALTORS®, in their real estate employment practices, shall not discriminate against any person or persons on the basis of race, color, religion, sex, handicap, familial status, national origin, sexual orientation, or gender identity.”

Each year, the Maryland Association of Realtors recognizes the significance of the anniversary of the 1968 Fair Housing Act and reconfirms their commitment to uphold fair housing laws as well as the commitment to offer equal professional service to all Maryland citizens in their search for real property. The Local, State and National Association of REALTORS® have dedicated pages on their websites

to Fair Housing. The Pen-Mar Regional Association of REALTORS® has brochures, videos, policy studies, infographics, and other educational materials for members.

Representatives from Pen-Mar were contacted during the Five-Year Consolidated Plan process; they did not report fair housing issues but did note that the increased price and very high demand for real estate has made it difficult for low-income families to purchase homes.

2. Newspaper and Online Advertising

Under Federal Law, no advertising with respect to the sale or rental of a dwelling unit may indicate any preference, limitation, or discrimination because of race, color, religion, sex, handicap, familial status, or national origin. Under the Fair Housing Act Amendments, descriptions are listed in regard to the use of words, photographs, symbols or other approaches that are considered discriminatory.

During the last Five-Year Consolidated Plan, the City consulted real estate ads in *At Home Places* Magazine and the *Herald-Mail* newspaper; *At Home Places* is no longer published and the *Herald-Mail* only publishes real estate advertisements on its website, *Herald-Mail Media*. Accordingly, for the 2025 Analysis of Impediments real estate listings were researched through *Herald-Mail Media*, the Pen-Mar REALTORS® website (see above), Zillow.com, and Craigslist.org.

Herald-Mail Media is owned by Gannett Co., Inc., a national news organization that manages over 200 individual newspapers. Its Real Estate Advertisements Equal Housing Opportunity statement is as follows:

The Federal Fair Housing Act makes it illegal to advertise "any preference, limitation, or discrimination because of race, color, religion, sex, handicap, familial status, or national origin, or intention to make any such preference, limitation, or discrimination." State law may also forbid discrimination based on these factors and others. We will not knowingly accept any advertising for real estate which is in violation of the law. All persons are hereby informed that all dwellings advertised are available on an equal opportunity basis. To complain of discrimination, call the U.S. Department of Housing and Urban Development at 800-669-9777.

Zillow is a real estate listing service with a large share of the national real estate market. Not only does Zillow have a fair housing statement, it has a Fair Housing

Guide to educate buyers, sellers, and agents on fair housing and discrimination in both rental and homebuyer situations, and links them to both US HUD and to the National Fair Housing Alliance for further detail. Zillow Group has an advocacy branch (advocacy.zillowgroup.com) that has the following mission:

Real Estate Rights for Consumers

Consumers deserve transparent, fair and equal opportunities in residential real estate and we are committed to reducing obstacles and improving the homebuying, homeselling, and renting experience. This starts by advocating for marketplace principles to govern the operations and interactions within the real estate industry, making it more equitable and modern to help more and more people get home.

Access to Information: We believe consumers and agents should have easy and free access to all available real estate information. That means everyone should have equal access to all home listings. Consumers should be able to see all available homes for sale – including new construction homes and properties listed for sale by owner – in a single search experience.

Independent Representation: We believe buyers and sellers should be represented by an agent who works solely for their best interests.

Fair & Transparent Compensation: Consumers should know who pays these fees and that they are negotiable.

Craigslist is a low cost classified ad service open to all, and due to its open structure its ads are of varying quality and fairness. For example, several advertisements strongly prohibited certain breeds of dog (which can limit service animals), others appeared to steer families either towards or away from certain properties, and at least one mentioned a single-occupancy-only unit. Some listings did specifically mention being accessible or having a multilingual leasing agent.

Additionally, craigslist does have a Fair Housing page entitled “Fair Housing is Everyone’s Right!” It provides education for both renters and lessors about the Federal and state law regarding Fair Housing including protected categories, exceptions, and how to recognize and report advertisement that may be discriminatory to both craigslist and to HUD or a local FHAP.

3. Private Financing

The Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (F.I.R.R.E.A.) requires any commercial institution that makes five (5) or more home mortgage loans, to report all home loan activity to the Federal Reserve Bank under the Home Mortgage Disclosure Act (HMDA). The 2023 HMDA data was obtained and is analyzed in the following pages of this Analysis of Impediments.

The tables on the following pages outline the disposition of conventional loans and FHA, FSA/RHS, and VA Home-Purchase Loans in the City of Hagerstown by Census Tract. The total population of the Census Tracts exceeds the population of Hagerstown as the municipal boundaries do not correspond exactly to the tract boundaries.

Note: the category “Purchased Loans” is omitted in these charts as it only refers to bank-to-bank transactions rather than homebuyer applications.

For tables IV-12 through IV-18, income and race data is compiled for the entirety of the Hagerstown-Martinsburg, MD-WV Metropolitan Statistical Area.

Table IV-12 – Disposition of Conventional Loans by Census Tract

Census Tract	Total Applications Received		Loans Originated		Approved, Not Accepted		Denied by Financial Institution		Withdrawn by Applicant		Filed Closed for Incompleteness	
	Total	% of Total	Census Tract	% of Tract	Census Tract	% of Tract	Census Tract	% of Tract	Census Tract	% of Tract	Census Tract	% of Tract
1	126	6.9%	64	50.8%	3	2.4%	27	21.4%	18	14.3%	5	4.0%
2	112	6.2%	74	66.1%	3	2.7%	12	10.7%	12	10.7%	1	0.9%
3.01	89	4.9%	55	61.8%	0	0.0%	15	16.9%	9	10.1%	2	2.2%
3.02	66	3.6%	33	50.0%	0	0.0%	13	19.7%	11	16.7%	3	4.5%
4	25	1.4%	8	32.0%	2	8.0%	7	28.0%	7	28.0%	0	0.0%
5	106	5.8%	60	56.6%	4	3.8%	17	16.0%	13	12.3%	1	0.9%
6.01	31	1.7%	12	38.7%	2	6.5%	8	25.8%	2	6.5%	4	12.9%
6.02	74	4.1%	42	56.8%	0	0.0%	13	17.6%	9	12.2%	0	0.0%
7	44	2.4%	24	54.5%	1	2.3%	4	9.1%	9	20.5%	2	4.5%
8	74	4.1%	37	50.0%	5	6.8%	12	16.2%	8	10.8%	2	2.7%
9	56	3.1%	30	53.6%	4	7.1%	12	21.4%	6	10.7%	1	1.8%
10.01	99	5.4%	56	56.6%	0	0.0%	22	22.2%	8	8.1%	3	3.0%
103	185	10.2%	93	50.3%	7	3.8%	51	27.6%	19	10.3%	8	4.3%
104.01	101	5.6%	49	48.5%	2	2.0%	27	26.7%	8	7.9%	3	3.0%
104.02	217	11.9%	77	35.5%	9	4.1%	73	33.6%	29	13.4%	11	5.1%
111	249	13.7%	132	53.0%	2	0.8%	49	19.7%	33	13.3%	4	1.6%
112.02	70	3.9%	44	62.9%	1	1.4%	13	18.6%	3	4.3%	3	4.3%
112.04	93	5.1%	53	57.0%	2	2.2%	12	12.9%	15	16.1%	2	2.2%
Total/% Total	1,817	100.0%	943	51.9%	47	2.6%	387	21.3%	219	12.1%	55	3.0%

Source: <https://ffiec.cfpb.gov/>

Slightly over half of conventional loan applications originated, while 21% were denied and 12% were withdrawn by the applicant. The lowest origination rates were in CT 4 (32.0%), CT 104.02 (35.5%), CT 6.01 (38.7%) and CT 104.01 (48.5%);

all other tracts had origination rates at or above 50% with the highest origination rate in CT 2 (66.1%). The highest denial rate was in CT 104.02 at 33.6%, and the lowest denial rate was in CT 7 at 9.1%.

Table IV-13 – Disposition of FHA, FSA/RHS & VA Loans by Census Tract

Census Tract	Total Applications Received		Loans Originated		Approved, Not Accepted		Denied by Financial Institution		Withdrawn by Applicant		Filed Closed for Incompleteness	
	Total	% of Total	Census Tract	% of Tract	Census Tract	% of Tract	Census Tract	% of Tract	Census Tract	% of Tract	Census Tract	% of Tract
1	52	4.7%	21	40.4%	0	0.0%	7	13.5%	9	17.3%	2	3.8%
2	80	7.2%	47	58.8%	1	1.3%	2	2.5%	7	8.8%	2	2.5%
3.01	55	5.0%	27	49.1%	0	0.0%	4	7.3%	6	10.9%	1	1.8%
3.02	34	3.1%	15	44.1%	0	0.0%	2	5.9%	4	11.8%	1	2.9%
4	10	0.9%	6	60.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
5	64	5.8%	30	46.9%	1	1.6%	5	7.8%	11	17.2%	2	3.1%
6.01	34	3.1%	17	50.0%	0	0.0%	6	17.6%	4	11.8%	0	0.0%
6.02	41	3.7%	17	41.5%	1	2.4%	3	7.3%	7	17.1%	5	12.2%
7	39	3.5%	16	41.0%	0	0.0%	6	15.4%	6	15.4%	0	0.0%
8	30	2.7%	12	40.0%	1	3.3%	2	6.7%	4	13.3%	0	0.0%
9	19	1.7%	6	31.6%	0	0.0%	3	15.8%	5	26.3%	3	15.8%
10.01	42	3.8%	17	40.5%	0	0.0%	8	19.0%	4	9.5%	3	7.1%
103	84	7.6%	40	47.6%	1	1.2%	3	3.6%	12	14.3%	4	4.8%
104.01	63	5.7%	32	50.8%	0	0.0%	7	11.1%	6	9.5%	2	3.2%
104.02	110	9.9%	48	43.6%	2	1.8%	18	16.4%	16	14.5%	5	4.5%
111	247	22.3%	105	42.5%	0	0.0%	45	18.2%	41	16.6%	8	3.2%
112.02	40	3.6%	16	40.0%	2	5.0%	3	7.5%	7	17.5%	0	0.0%
112.04	64	5.8%	30	46.9%	1	1.6%	9	14.1%	7	10.9%	1	1.6%
Total	1,108	100%	502	45.3%	9	0.9%	133	12.0%	156	14.1%	39	3.5%

Source: <https://ffiec.cfpb.gov/>

A lower proportion of FHA, USDA FSA/RHS, and VA home loan applications were originated than applications for conventional loans, and a lower proportion were declined as well. When Purchased Loans are omitted, the origination rates are somewhat higher and denial rates are lower for government-backed loans.

Tables IV-14 through IV-18 show the disposition of conventional loans disaggregated by minority status and income level for the Hagerstown-Martinsburg, MD-WV MSA. The number of applications for conventional loans submitted by White, non-Hispanic applicants significantly outnumbers minority applicants in each income level analyzed. Denial rate differences are considered to be disproportionate if the difference is 10% or greater between two groups. The percentages are based on the number of applicants in each minority status category, and since the White, non-Hispanic applicants far outnumber the minority applicants in each category, the results may be slightly misleading.

Note: there are 1,016 applicants in the Hagerstown-Martinsburg MSA with no income, negative income, or income not listed. These applications are omitted in Tables IV-14 through IV-18. The category “Purchased Loans” is also omitted from the following tables.

Table IV-14: Disposition of Applications by Minority Status, Greater than 0% and Less than 50% of Area Median Income

Minority Status	Total Applications Received		Loans Originated		Approved, Not Accepted		Denied by Financial Institution		Withdrawn by Applicant		Filed Closed for Incompleteness	
	Total	% of Total	# by Status	% by Status	# by Status	% by Status	# by Status	% by Status	# by Status	% by Status	# by Status	% by Status
American Indian or Alaska Native	7	0.8%	4	57.1%	0	0.0%	1	14.3%	0.0%	0.0%	2	28.6%
Asian	12	1.4%	3	25.0%	0	0.0%	6	50.0%	25.0%	3.9%	0	0.0%
Black or African American	55	6.5%	17	30.9%	0	0.0%	28	50.9%	10.9%	7.9%	4	7.3%
Native Hawaiian or Other Pacific Islander	0	0.0%	0	-	0	-	0	-	0	-	0	-
White	647	76.4%	273	42.2%	25	3.9%	244	37.7%	8.7%	73.7%	43	6.6%
Two or More Races, Joint, or Race Not Available	11	1.3%	0	0.0%	0	0.0%	0	0.0%	0.0%	0.0%	5	45.5%



Total	847	100.0%	348	41.1%	29	3.4%	317	37.4%	9.0%	9.0%	60	7.1%
Hispanic or Latino	61	7.2%	25	41.0%	2	3.3%	28	45.9%	6.6%	5.3%	1	1.6%
Not Hispanic or Latino	666	78.6%	277	41.6%	24	3.6%	255	38.3%	8.9%	77.6%	46	6.9%
Joint or Ethnicity Not Available	120	14.2%	46	38.3%	3	2.5%	34	28.3%	10.8%	17.1%	13	10.8%

Source: <https://ffiec.cfbp.gov/>

The above table indicates that for homebuyers in the 0-50% AMI range (extremely low- and low-income), White applicants have a higher origination rate and lower denial rate than most minority or Hispanic or Latino applicants. There is a disproportionately low origination rate for Black or African American homebuyers as well as a disproportionately high denial rate. With their very small sample sizes, the high origination and low denial rate for American Indian or Alaska Native homebuyers and the low origination and high denial rate for Asian homebuyers can be considered outliers.

Table IV-15: Disposition of Applications by Minority Status, 50-79% of Area Median Income

Minority Status	Total Applications Received		Loans Originated		Approved, Not Accepted		Denied by Financial Institution		Withdrawn by Applicant		Filed Closed for Incompleteness	
	Total	% of Total	# by Status	% by Status	# by Status	% by Status	# by Status	% by Status	# by Status	% by Status	# by Status	% by Status
American Indian or Alaska Native	7	0.4%	5	71.4%	0	0.0%	1	14.3%	1	14.3%	0	0.0%
Asian	35	2.0%	21	60.0%	0	0.0%	8	22.9%	6	17.1%	0	0.0%
Black or African American	118	6.6%	45	38.1%	5	4.2%	49	41.5%	14	11.9%	4	3.4%
Native Hawaiian or Other Pacific Islander	6	0.3%	3	50.0%	0	0.0%	3	50.0%	0	0.0%	0	0.0%
White	1,331	74.9%	771	57.9%	42	3.2%	302	22.7%	118	8.9%	71	5.3%
Two or More Races, Joint, or Race Not Available	281	15.8%	136	48.4%	5	1.8%	80	28.5%	25	8.9%	19	6.8%
Total	1,777	100.0%	981	55.2%	52	2.9%	443	24.9%	164	9.2%	94	5.3%



Hispanic or Latino	153	8.6%	90	58.8%	2	1.3%	38	24.8%	13	8.5%	4	2.6%
Not Hispanic or Latino	1,352	76.1%	752	55.6%	41	3.0%	339	25.1%	125	9.2%	72	5.3%
Joint or Ethnicity Not Available	273	15.4%	139	50.9%	9	3.3%	66	24.2%	26	9.5%	18	6.6%

Source: <https://ffiec.cfb.gov/>

The above table indicates that for homebuyers in the 50-80% AMI range (moderate-income), there is a disproportionately low origination rate for Black or African American homebuyers as well as a disproportionately high denial rate.

Table IV-16: Disposition of Applications by Minority Status, 80-99% of Area Median Income

Minority Status	Total Applications Received		Loans Originated		Approved, Not Accepted		Denied by Financial Institution		Withdrawn by Applicant		Filed Closed for Incompleteness	
	Total	% of Total	# by Status	% by Status	# by Status	% by Status	# by Status	% by Status	# by Status	% by Status	# by Status	% by Status
American Indian or Alaska Native	5	0.5%	3	60.0%	0	0.0%	1	20.0%	1	20.0%	0	0.0%
Asian	28	2.7%	18	64.3%	0	0.0%	7	25.0%	3	10.7%	0	0.0%
Black or African American	79	7.7%	38	48.1%	3	3.8%	25	31.6%	11	13.9%	1	1.3%
Native Hawaiian or Other Pacific Islander	0	0.0%	0	-	0	-	0	-	0	-	0	-
White	743	72.3%	452	60.8%	24	3.2%	147	19.8%	71	9.6%	36	4.8%
Two or More Races, Joint, or Race Not Available	12	1.2%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	12	100.0%
Total	1,028	100.0%	596	58.0%	33	3.2%	221	21.5%	104	10.1%	49	4.8%
Hispanic or Latino	58	5.6%	31	53.4%	1	1.7%	19	32.8%	4	6.9%	2	3.4%
Not Hispanic or Latino	802	78.0%	482	60.1%	28	3.5%	161	20.1%	80	10.0%	37	4.6%
Joint or Ethnicity Not Available	168	16.3%	83	49.4%	4	2.4%	41	24.4%	20	11.9%	10	6.0%



Source: <https://ffiec.cfbp.gov/>

The above table indicates that there are no disproportionately low origination rates, though Black or African American households are very close at 9.9% below the average approval rate. For denial rates, there are two disproportionately affected groups: Hispanic or Latino homebuyers and Black or African American homebuyers.

Table IV-17: Disposition of Applications by Minority Status, 100-119% of Area Median Income

Minority Status	Total Applications Received		Loans Originated		Approved, Not Accepted		Denied by Financial Institution		Withdrawn by Applicant		Filed Closed for Incompleteness	
	Total	% of Total	# by Status	% by Status	# by Status	% by Status	# by Status	% by Status	# by Status	% by Status	# by Status	% by Status
American Indian or Alaska Native	2	0.2%	1	50.0%	0	0.0%	0	0.0%	0	0.0%	1	50.0%
Asian	20	2.4%	11	55.0%	0	0.0%	4	20.0%	4	20.0%	1	5.0%
Black or African American	70	8.5%	33	47.1%	2	2.9%	20	28.6%	9	12.9%	3	4.3%
Native Hawaiian or Other Pacific Islander	2	0.2%	2	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
White	593	71.9%	392	66.1%	20	3.4%	94	15.9%	55	9.3%	20	3.4%
Two or More Races, Joint, or Race Not Available	138	16.7%	61	44.2%	8	5.8%	33	23.9%	18	13.0%	10	7.2%
Total	825	100.0%	500	60.6%	30	3.6%	151	18.3%	86	10.4%	35	4.2%
Hispanic or Latino	50	6.1%	30	60.0%	0	0.0%	12	24.0%	5	10.0%	1	2.0%
Not Hispanic or Latino	654	79.3%	415	63.5%	23	3.5%	119	18.2%	60	9.2%	25	3.8%
Joint or Ethnicity Not Available	121	14.7%	55	45.5%	7	5.8%	20	16.5%	21	17.4%	9	7.4%

Source: <https://ffiec.cfbp.gov/>



Omitting the outlier Native Hawaiian or Other Pacific Islander group (only two loan applicants), there are three groups with disproportionately low origination rates: Black or African American, Two or More Races/Joint/Race Not Available, and Joint/Ethnicity Not Available. Black or African American homebuyers also have disproportionately high denial rates.

Table IV-18: Disposition of Applications by Minority Status, 120% or More of Area Median Income

Minority Status	Total Applications Received		Loans Originated		Approved, Not Accepted		Denied by Financial Institution		Withdrawn by Applicant		Filed Closed for Incompleteness	
	Total	% of Total	# by Status	% by Status	# by Status	% by Status	# by Status	% by Status	# by Status	% by Status	# by Status	% by Status
American Indian or Alaska Native	8	0.3%	1	12.5%	0	0.0%	5	62.5%	2	25.0%	0	0.0%
Asian	150	5.5%	93	62.0%	4	2.7%	16	10.7%	23	15.3%	13	8.7%
Black or African American	236	8.6%	117	49.6%	10	4.2%	49	20.8%	45	19.1%	13	5.5%
Native Hawaiian or Other Pacific Islander	5	0.2%	1	20.0%	0	0.0%	3	60.0%	1	20.0%	0	0.0%
White	1,806	65.8%	1,206	66.8%	39	2.2%	261	14.5%	208	11.5%	70	3.9%
Two or More Races, Joint, or Race Not Available	536	19.5%	311	58.0%	14	2.6%	85	15.9%	62	11.6%	29	5.4%
Total	2,743	100.0%	1,729	63.0%	67	2.4%	420	15.3%	341	12.4%	125	4.6%
Hispanic or Latino	107	3.9%	54	50.5%	1	0.9%	23	21.5%	24	22.4%	4	3.7%
Not Hispanic or Latino	2,141	78.1%	1,385	64.7%	52	2.4%	317	14.8%	266	12.4%	94	4.4%
Joint or Ethnicity Not Available	495	18.0%	290	58.6%	14	2.8%	80	16.2%	51	10.3%	27	5.5%

Source: <https://ffiec.cfpb.gov/>

In the 120% or Greater of AMI category, both Black or African American homebuyers and Hispanic or Latino homebuyers have disproportionately low origination rates.



To examine overall trends that may reflect discriminatory practices, **Table IV-19** below shows the overall loan dispositions for applicants of all income levels by race or ethnicity.

Table IV-19: Disposition of Conventional Loan Applications by Race or Ethnicity (All Income Levels)

Minority Status	Total Applications Received		Loans Originated		Approved, Not Accepted		Denied by Financial Institution		Withdrawn by Applicant		Filed Closed for Incompleteness	
	Total	% of Total	# by Status	% by Status	# by Status	% by Status	# by Status	% by Status	# by Status	% by Status	# by Status	% by Status
American Indian or Alaska Native	30	0.4%	15	50.0%	0	0.0%	8	26.7%	4	13.3%	3	10.0%
Asian	265	3.2%	156	58.9%	4	1.5%	46	17.4%	43	16.2%	15	5.7%
Black or African American	583	7.1%	253	43.4%	20	3.4%	191	32.8%	85	14.6%	26	4.5%
Native Hawaiian or Other Pacific Islander	14	0.2%	6	42.9%	0	0.0%	7	50.0%	1	7.1%	0	0.0%
White	5,344	64.9%	3,141	58.8%	153	2.9%	1,203	22.5%	520	9.7%	243	4.5%
Two or More Races, Joint, or Race Not Available	2,001	24.3%	829	41.4%	52	2.6%	317	15.8%	172	8.6%	83	4.1%
Total	8,237	100.0%	4,400	53.4%	229	2.8%	1,772	21.5%	825	10.0%	370	4.5%
Hispanic or Latino	457	5.5%	233	51.0%	7	1.5%	140	30.6%	52	11.4%	13	2.8%
Not Hispanic or Latino	5,864	71.2%	3,374	57.5%	173	3.0%	1,348	23.0%	606	10.3%	278	4.7%
Joint or Ethnicity Not Available	1,916	23.3%	793	41.4%	49	2.6%	284	14.8%	167	8.7%	79	4.1%

Source: <https://ffiec.cfpb.gov/>

As seen in the above tables, Black or African American homebuyers are disproportionately affected by low origination rates, high denial rates, or both in all income categories. This appears to be a systemic issue in the Hagerstown-Martinsburg MSA and should be investigated further. At or above 80% AMI, Hispanic or Latino homebuyers are also disproportionately affected. American Indian or Alaska Native homebuyers and Native Hawaiian and Other Pacific Islander homebuyers may be disproportionately affected but have small population sizes, introducing calculation error.

In the overall table, it can also be noted that the Two or More Races/Joint/Race Not Available and Joint or Ethnicity Not Available categories are more likely to have disproportionately low loan origination rates, which may be due to a lower median household income.

Table IV-20 below examines the denial rates of conventional loans by primary denial reason and income level.

Table IV-20 – Conventional Loan Denial Rates by Primary Denial Reason and Income Level

	0-50% AMI		50-79% AMI		80-99% AMI		100-119% AMI		120% or More AMI		No / Negative / Income Not Available		Total Denials	
	# by Income	% by Income	# by Income	% by Income	# by Income	% by Income	# by Income	% by Income	# by Income	% by Income	# by Income	% by Income	Total	% of Total
Debt to Income Ratio	133	42.0%	140	31.6%	68	30.8%	34	22.5%	64	15.2%	27	12.3%	466	26.3%
Employment History	4	1.3%	10	2.3%	2	0.9%	1	0.7%	5	1.2%	8	3.6%	30	1.7%
Credit History	111	35.0%	159	35.9%	82	37.1%	60	39.7%	157	37.4%	107	48.6%	676	38.1%
Collateral	27	8.5%	51	11.5%	29	13.1%	19	12.6%	90	21.4%	6	2.7%	222	12.5%
Insufficient Cash	9	2.8%	8	1.8%	5	2.3%	4	2.6%	10	2.4%	1	0.5%	37	2.1%
Unverifiable Information	6	1.9%	9	2.0%	5	2.3%	4	2.6%	15	3.6%	2	0.9%	41	2.3%
Credit Application Incomplete	10	3.2%	19	4.3%	10	4.5%	10	6.6%	25	6.0%	56	25.5%	130	7.3%
Mortgage Insurance Denied	5	1.6%	8	1.8%	1	0.5%	2	1.3%	11	2.6%	5	2.3%	32	1.8%
Other	12	3.8%	39	8.8%	19	8.6%	17	11.3%	43	10.2%	8	3.6%	138	7.8%



Total Denials / % of Total	317	17.9%	443	25.0%	221	12.5%	151	8.5%	420	23.7%	220	12.4%	1,772	100%
Applications / % Denied	847	37.4%	1,778	24.9%	1,028	21.5%	825	18.3%	2,743	15.3%	1,016	21.7%	8,237	21.5%

Source: <https://ffiec.cfpb.gov/>

For applicants earning less than 50% Area Median Income the most common reason for denial is Debt-to-Income Ratio. The most common denial reasons for applicants at or above 50% AMI as well as for applicants with no, negative, or unavailable income is Credit History. These two denial reasons can be related – high unsecured debt is one cause of low credit scores, and financial institutions screen higher-income applicants through their credit score rather than needing to examine their debt-to-income ratio (as for someone with a less-established credit history). Overall, the three most common reasons for denial are Credit History (38.1%), Debt to Income Ratio (26.3%), and Collateral (12.5%).

Loan applications from low-income households (less than 50% of the Area Median Income) have a denial rate of 37.4%, compared to a denial rate of 15.3% of those whose income is more than 120% of the AMI. Upper-income households have higher origination rates than other income groups. In summary, the HMDA Data indicates that the lower the household income, the lower the origination rate and the higher the rate of denial. Nationwide, there were 8,876,548 applications for conventional loans in 2023 of which 4,524,455 loans were originated and 1,694,034 applications were denied for an origination rate of 51.0% and a denial rate of 19.1%. The Hagerstown-Martinsburg MSA origination rate is slightly higher at 53.4%, but its denial rate is also higher at 21.5%.

In all income groups, White, non-minority applicants for a conventional home purchase loan substantially outnumber minority applicants. The overall percentage of White applicants accounts for 64.9% of the total number of applications, with a peak of 76.4% in the 0-50% AMI category and a low of 22.0% of those with no, negative, or unavailable income. Loan origination rates are higher for White applicants than for minority applicants as a whole and minority denial rates are higher than White denial rates. Black or African American applicants as a whole and in each individual income category above 0% income have disproportionately higher denial rates and/or lower origination rates; there are also disproportionately affected Hispanic or Latino and Asia applicants in multiple categories. Further investigation is needed to determine the causes of these denials, and whether there is a systemic Fair Housing issue.

D. Citizen Participation:

In parallel with its FFY 2025-2029 Five-Year Consolidated Plan and FFY 2025 Annual Action Plan process, the City of Hagerstown’s 2025-2029 Analysis of Impediments to Fair Housing Choice included the following citizen participation.

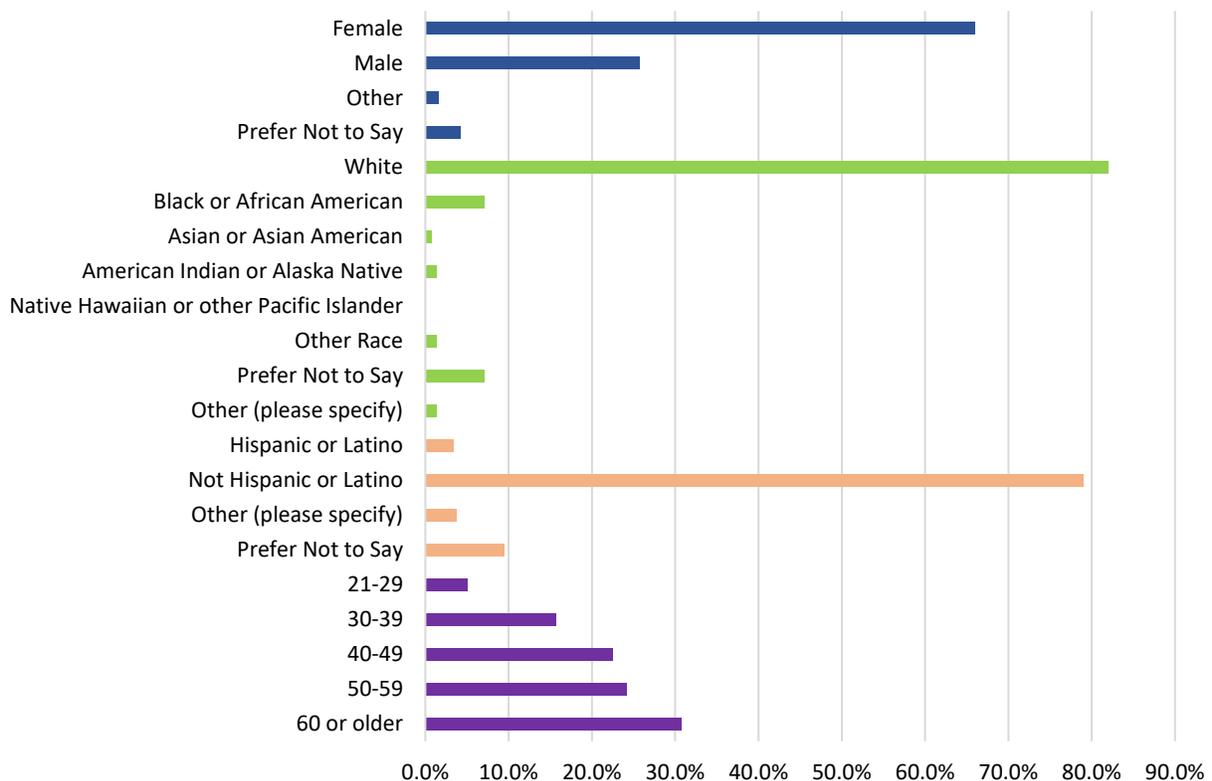
1. Resident Survey

As a part of the consolidated planning process, the City of Hagerstown distributed a Resident Survey online at:

- English: <https://www.surveymonkey.com/r/HagerstownCDBG2025-2029>
- Spanish: <https://es.surveymonkey.com/r/HagerstownCDBG2025-2029ESP>

The resident survey was available from January 20, 2025 to March 3, 2025. Additionally, the surveys were available in paper form for any residents, agencies, service providers, or community groups that requested them. There was a total of 377 resident questionnaires completed, 374 in English and 3 in Spanish. The chart below gives a visual representation of the respondents’ demographics.

Chart IV-2: Demographics of Survey Respondents



Examining the survey’s demographics:

- A majority of respondents (66.3%) are female.
- A majority of respondents (82.0%) are White, and 78.8% of respondents are not Hispanic or Latino.
- A plurality of respondents (30.8%) are 60 years of age or older; a majority (54.9%) are 50 years of age or older.
- A majority of respondents (73.2%) are homeowners; another 22.5% of respondents are renters.

Chart IV-3: Respondents’ Household Size

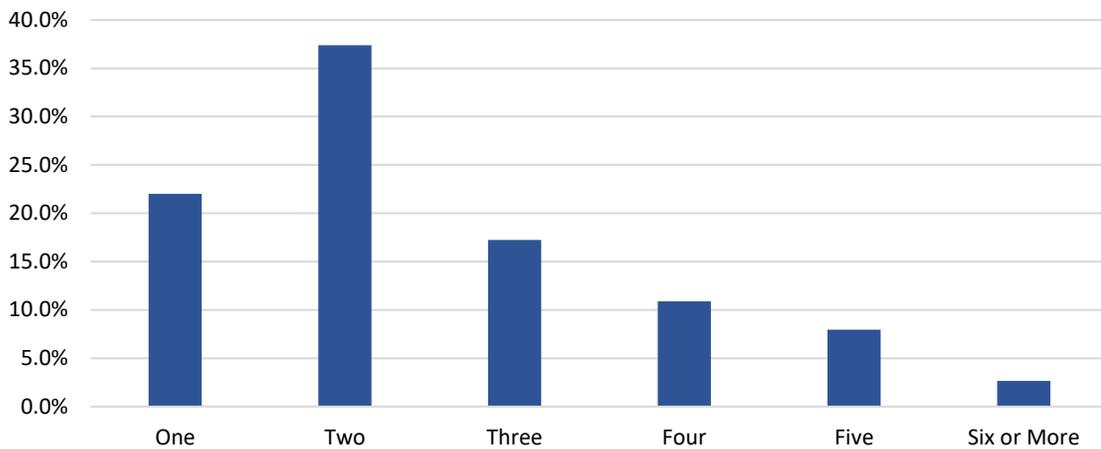
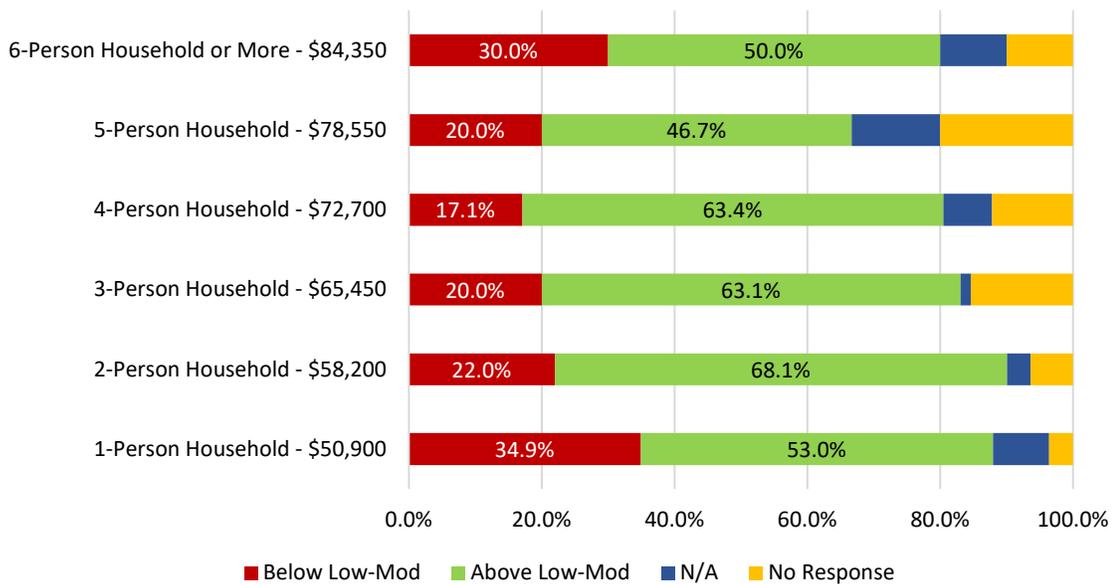
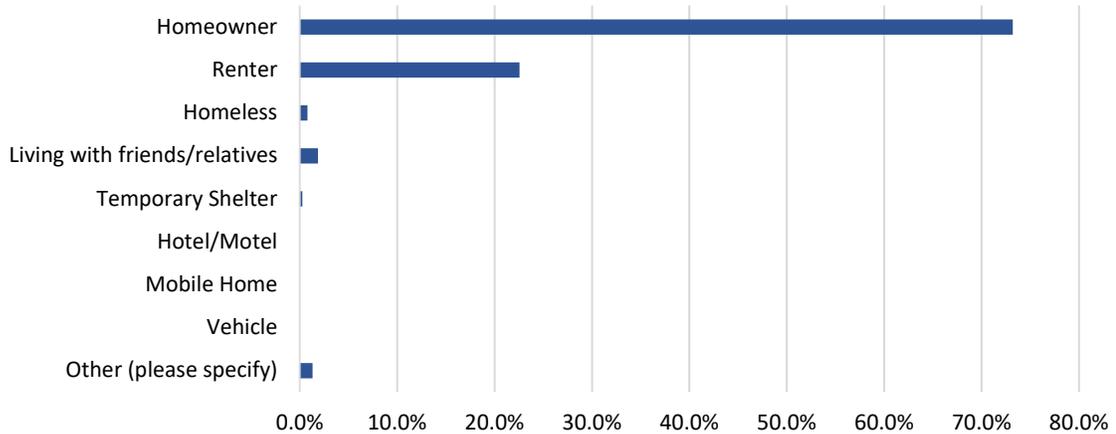


Chart IV-4: Respondents’ Household Income by Size



The chart below identifies the living situation of each respondent:

Chart IV-5: Living Situation of Respondents

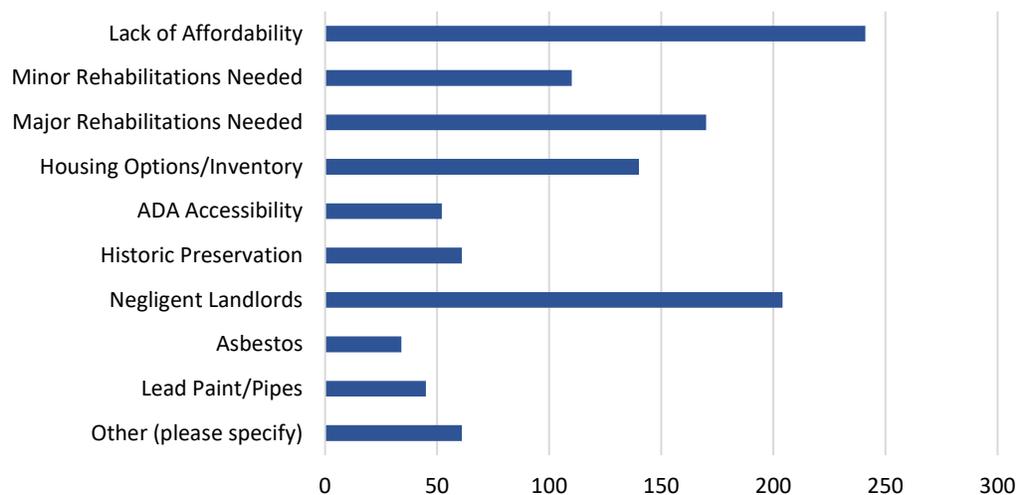


The large majority of survey-takers (73.2%) lived in owner-occupied households, while another 22.5% were renters.

Needs and Issues Within Hagerstown:

The survey-takers were asked a series of questions about the needs of Hagerstown. A summarized selection of their responses is below:

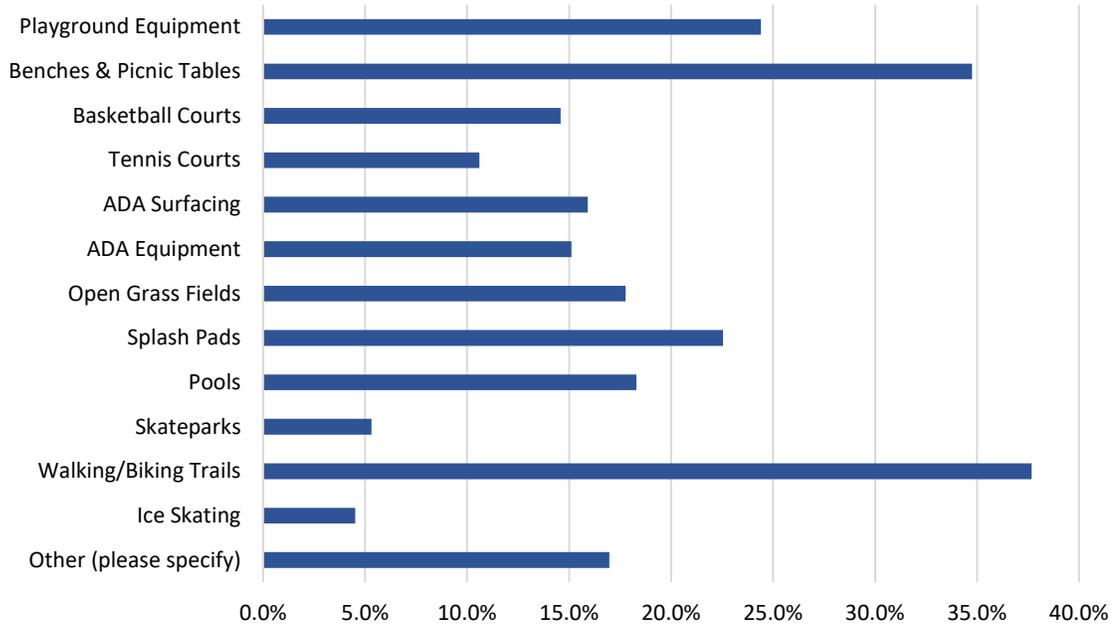
Chart IV-6: Housing or Rental Issues



“Other” responses included the need for inspections, substandard rental properties with pest and mold issues, lack of inventory for specific groups such as

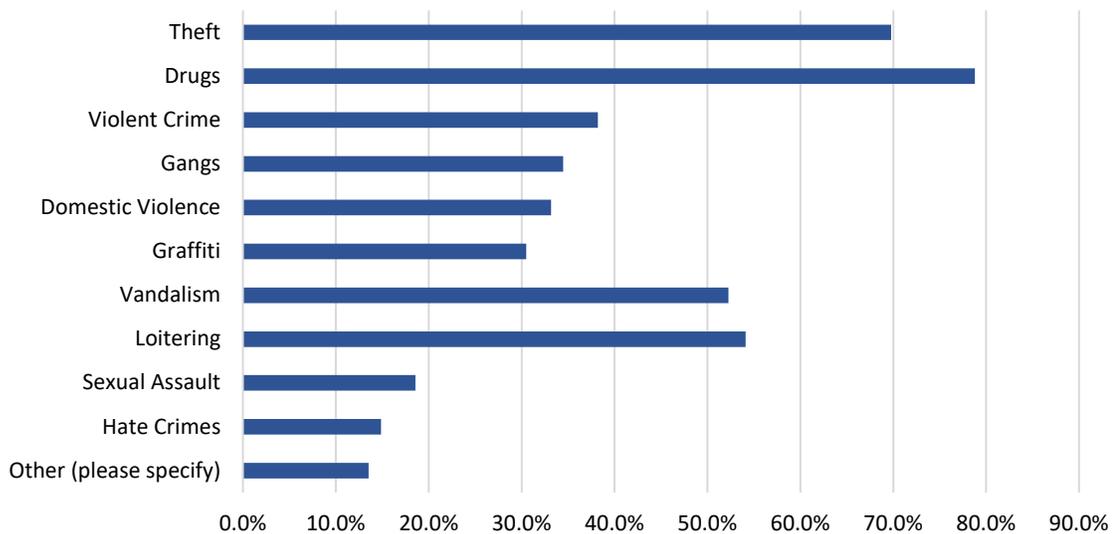
seniors or middle-class families, potential discrimination, high application fees, criminal activity, and a perception of having too many low-income Section 8 voucher recipients.

Chart IV-7: Parks & Recreation Needs



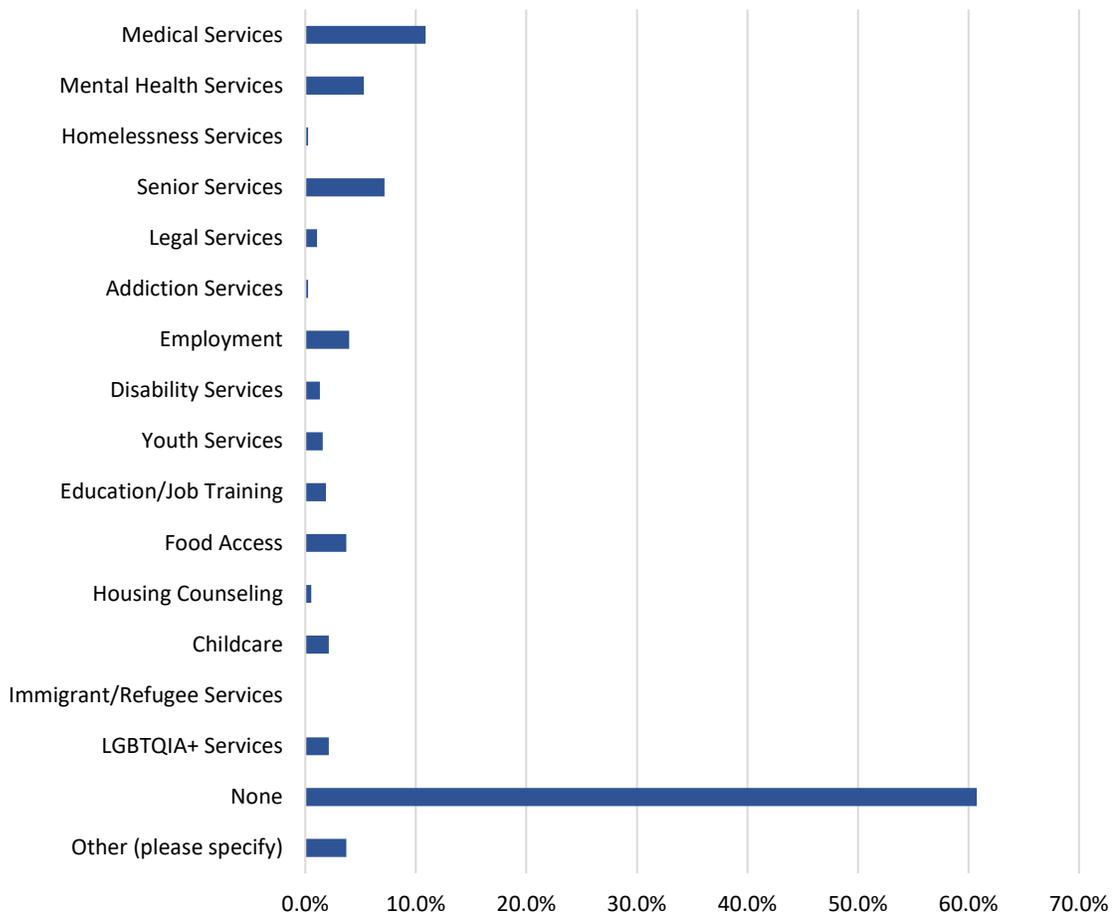
“Other” responses included litter pickup, pickleball courts, trail maintenance, safety, Little Free Libraries, and more park space near high-density housing.

Chart IV-8: Crime Issues



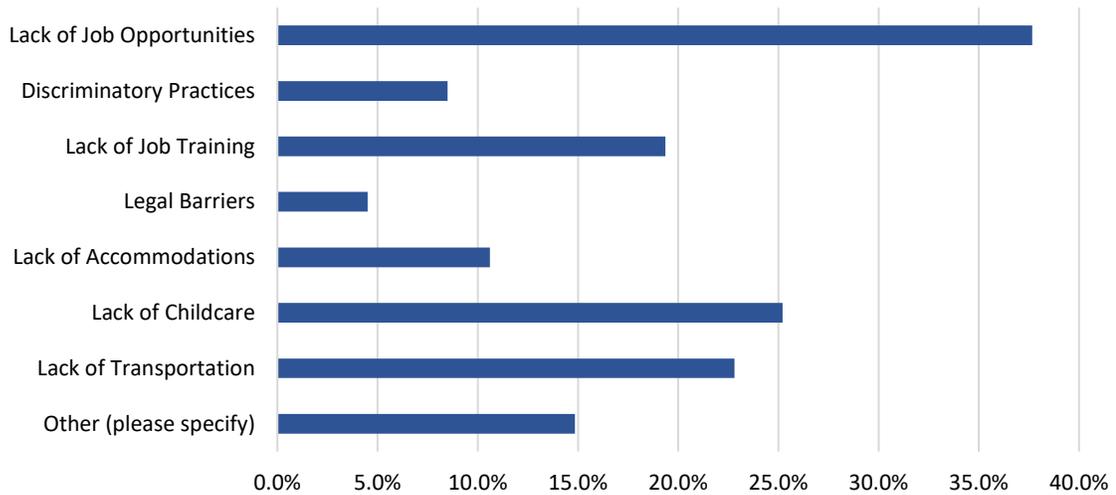
“Other” responses included littering, public urination & defecation, traffic violations (especially by bicyclists), harassment/stalking, panhandling, racism & anti-LGBTQ activity, car theft, drug sales & sex work in some neighborhoods, and respondents viewing homelessness as illegal.

Chart IV-9: Services Used



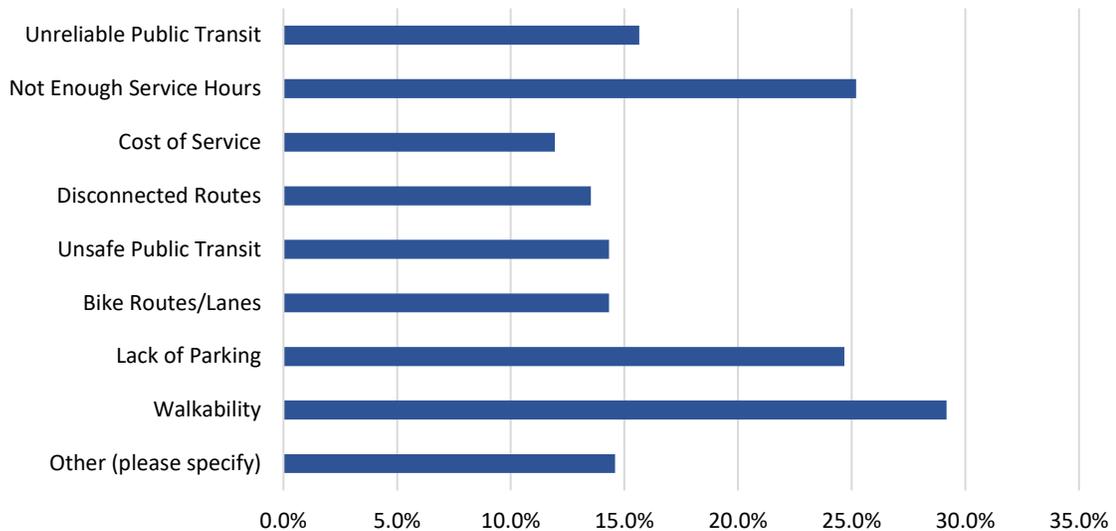
Most respondents (60.7%) do not use services provided by local social service agencies. The most commonly used social services were Medical (10.9%), Senior (7.2%), and Mental Health (5.3%). “Other” responses included services for veterans, domestic violence victims, literacy, and physical wellness.

Chart IV-10: Employment Issues



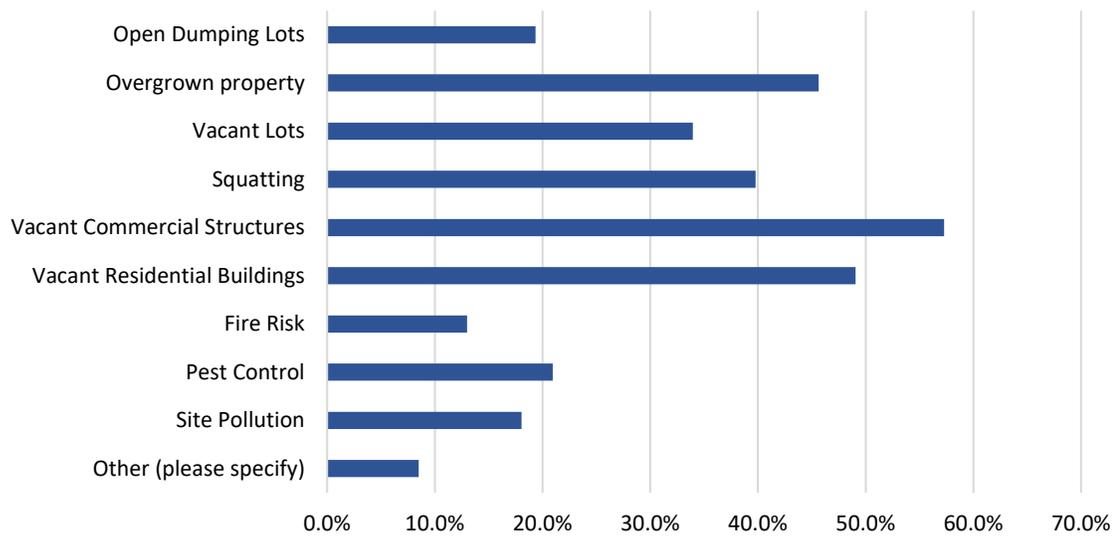
“Other” responses included the perception of people not wanting to work, lack of job postings, jobs not paying a living wage, a need for more white-collar and technical job categories, and more jobs needed for displaced or elderly workers.

Chart IV-11: Transportation Issues



“Other” responses included rough or impassable sidewalks, people not following traffic or pedestrian laws, confusion over the bus schedule, dislike of the new parking app and rates, the need for better traffic control, and pedestrian safety.

Chart IV-12: Blight Issues



“Other” responses included sanitary and septic sewer backups, homelessness generally, litter and trash collection, vacant community structures, a lack of trees and green space, lack of outdoor bathrooms (and related public urination and defecation), poor condition of the City’s alleyways, and a lack of interest by property owners in maintenance.

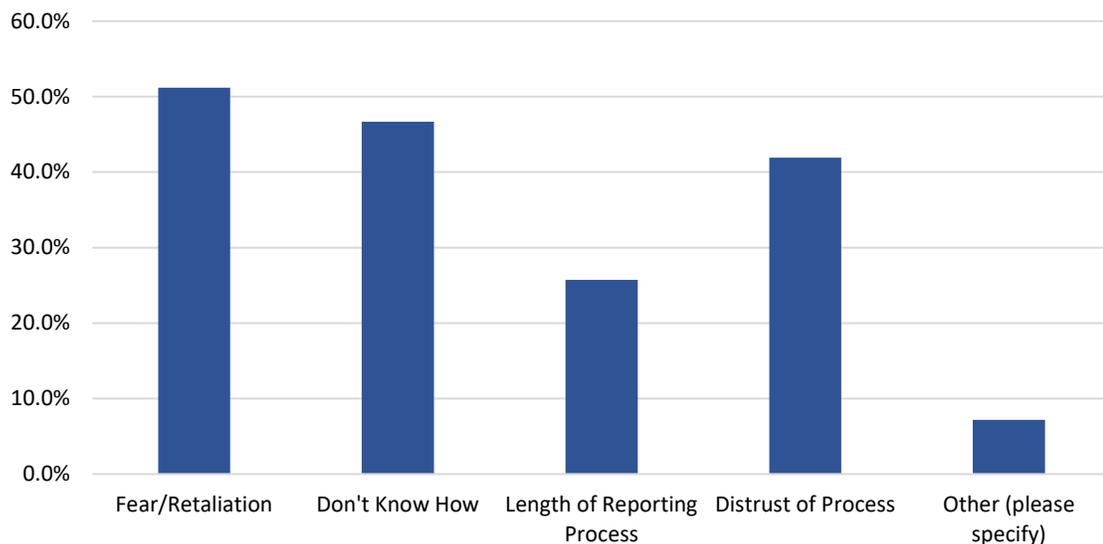
Below is a selection of responses to the question “Are there any programs or services that are missing or under-funded in the City?”

- Fair Housing and Tenants’ Rights programs
- Drug safety & counseling
- Mental health
- Youth programs and facilities
- Recreation centers
- Rehabilitation programs for post-incarceration
- Street sweeping
- Senior programs
- Property tax relief, especially for seniors
- Code enforcement
- Rehousing programs
- Year-around shelter space generally, but especially for single parents, women, and families
- Day shelters

- Homelessness prevention and utility assistance programs
- Security deposit assistance
- Wrap-around services
- Police and security presence
- Life skills and budgeting education
- Childcare and after-school care
- Children’s literacy programs
- More parks & recreation programming
- Trash collection and litter pickup
- Expanded public transportation

In response to the question “Are you aware of how to report fair housing violations in the City of Hagerstown?” 114 persons responded “Yes”, 142 responded “No”, and 62 were unsure. The following chart shows the reasons why respondents think Fair Housing violations would not be reported:

Chart IV-13: Reasons why Fair Housing Complaints Are Not Reported



Fear or retaliation was the most commonly-perceived reason for not reporting a fair housing concern to the City, State, or Federal government. “Other” reasons included tenants not knowing that an issue is illegal, the lack of time for busy households to file a complaint, the lack of other housing options, and especially the feeling that nothing will change positively if they do report an issue.

Fifteen (15) respondents who were renters reported that their current or past landlords had refused to make accommodations. Some of these were related to plumbing backups, pest control, windows, or other livability issues that the property management had not addressed. Others related to faulty or missing mobility aids at either the primary door or the emergency exit of the housing unit.

To follow up with the question about whether residents knew how to lodge fair housing complaints, respondents were asked about the likeliness of scenarios that may cause housing discrimination in Hagerstown. The following table discusses those survey results, with the total number of responses per question.

Table IV-21: Situations Which May Cause Housing Discrimination in Hagerstown

	Agree	Neutral / Unsure	Disagree	Total Responses
State or Local laws and policies that limit housing choice	20.2%	34.0%	18.8%	275
Lack of fair housing organizations in the City	25.5%	29.4%	18.8%	278
Lack of knowledge among bankers/lenders regarding fair housing	22.5%	31.6%	18.8%	275
Lack of knowledge among landlords and property managers regarding fair housing	33.4%	27.1%	13.3%	278
Lack of knowledge among real estate agents regarding fair housing	21.8%	32.6%	17.8%	272
Lack of knowledge among residents regarding fair housing	41.6%	23.6%	8.5%	278
Lack of accessible housing for persons with disabilities	32.1%	31.8%	9.5%	277
Lack of accessibility in neighborhoods (i.e. curb cuts)	27.6%	28.9%	15.1%	270
Lack of fair housing education	35.5%	25.5%	11.1%	272
Lack of affordable housing in certain areas	48.0%	17.0%	9.3%	280
Concentration of subsidized housing in certain neighborhoods	40.1%	24.1%	8.8%	275

Slightly under half of the respondents replied that the lack of affordable housing would cause housing discrimination in Hagerstown. “Other” responses to this question include the need to promote homeownership rather than rental, the risk that gentrification will force current residents from their current neighborhoods, the need for increased safety and police presence in affordable neighborhoods, disregard of Fair Housing regulations by landlords and property managers, lack of

inventory, zoning barriers, and lack of knowledge among lenders about how to apply government incentives.

Finally, respondents were given the opportunity to add freeform comments about their perceptions of Hagerstown. A paraphrased selection of comments is below:

- Many respondents want the City to focus on improving residential neighborhoods in public infrastructure and usability, not warehouses.
- Blight came up multiple times, with a need for demolitions and keeping squatters out of vacant houses.
- Crime is growing in perception, visibility and frequency, and several respondents report feeling unsafe. Multiple comments requested increased police presence and activity, but some respondents noted that police need a better education in defusing violence and minority rights.
- Respondents also perceive increased homelessness. Some respondents want to deal with the homeless population harshly (including involuntary job programs, imprisonment, or relocation to Baltimore), while others want aid for at-risk households and job security to prevent homelessness and a better way to house homeless individuals and families.
- Housing prices are “ridiculous”, and rent is “out of control”. Waiting lists are too long for income-based housing and the housing market is overwhelmed by homebuyers and renters from the Washington/Baltimore area. Some respondents want lower property taxes to compensate for higher housing costs.
- A number of respondents thanked the City for their efforts and admired the community, though some were upset by various City actions and inactions like code enforcement.

2. Citizen Comments

The City did not receive any public hearing comments in regard to the “draft” Analysis of Impediments to Fair Housing Choice. The Appendix of the FFY 2025-2029 Five Year Consolidated Plan includes the following supporting documentation applicable to the 2025 Analysis of Impediments:

- Public Hearing Notice
- Public Hearing Agenda
- Public Hearing Sign-In Sheets
- Public Hearing Minutes

V. Actions and Recommendations

The City of Hagerstown's 2025-2029 Analysis of Impediments to Fair Housing Choice has identified the following potential Impediments to Fair Housing Choice, along with goals and strategies to address those impediments to Affirmatively Further Fair Housing (AFFH) in the City:

Impediment 1: Fair Housing Education, Outreach, and Enforcement

Between 2020 and 2024 there were twenty-eight (28) Fair Housing Complaints filed with HUD in Hagerstown. Stakeholders have reported that many more go unreported. There is a need to educate persons about their Fair Housing rights and landlord responsibilities to raise awareness about Fair Housing.

Goal: The general public, City officials, lenders, landlords, and housing providers will become knowledgeable and aware of the Fair Housing Act and other housing laws and regulations. The City will strive to fulfill its responsibility to affirmatively further fair housing in the City of Hagerstown.

Strategies: In order to attain this goal, the following activities and strategies should be undertaken:

- **1-A:** Support and empower a Fair Housing Commission or Program to address fair housing complaints and promote fair housing in the City of Hagerstown.
- **1-B:** Help residents understand their rights under the Fair Housing Act, the Americans with Disabilities Act, and other applicable Federal, state, and local law and regulations through media, seminars, informational literature, and partnerships with fair housing organizations.
- **1-C:** Cooperate with the local Board of Realtors, Landlords' Association, and lenders to ensure landlords, sellers, lenders, and real estate agents are aware of and follow Fair Housing regulations.
- **1-D:** Continue the City's Rental Registry Program to identify substandard rental housing and discriminatory practices, help landlords address these issues, and enforce penalties when needed.

Impediment 2: Decent, Safe, Sound, Sanitary, Accessible and Affordable Housing Options

The average sale price of a home in the Hagerstown Area in December 2024 was \$320,000, which is out of reach for low- and moderate-income City residents. There were over 27,000 applicants on the Hagerstown Housing Authority's public housing and housing voucher waitlists in 2024. Additionally, 37% of homeowners with a mortgage and 52% of renters in Hagerstown spend over 30% of their total household income on housing. There is a need for additional housing options that are decent, safe, sound, sanitary, accessible and affordable for both homebuyers and renters.

Goal: The supply of affordable for-sale and for-rent housing options that is decent, safe, sound, sanitary, and accessible will meet the needs of all households in the City of Hagerstown, through new construction, rehabilitation, and infill of dedicated housing and mixed-use structures.

Strategies: In order to attain this goal, the following activities and strategies should be undertaken:

- **2-A:** Continue to work with private, public, and nonprofit entities to renovate and construct new high-quality housing throughout the City, with a focus on affordability and homeownership.
- **2-B:** Continue to promote the City's Homeownership Program and Down Payment Assistance Program to increase the proportion of owner-occupied housing in order to advance wealth building, reduce the household cost burden, and encourage reinvestment and a sense of community pride.
- **2-C:** Continue to promote and finance the City's Home Rehabilitation Programs to conduct emergency repairs, install utility connections, and make improvements toward meeting City and national building codes for safety, energy efficiency and accessibility.
- **2-D:** Provide incentives to landlords to maintain rental properties to meet City and universal building codes for safety, energy efficiency and accessibility through construction and rehabilitation of rental housing, code enforcement activity, and continued use of the City's Rental Registry Program.
- **2-E:** Provide support to seniors and persons with disabilities in making accessibility improvements to their homes so they can continue to live independently.

- **2-F:** Continue to work with the Hagerstown Housing Authority to provide residents with high-quality accessible public housing options and housing choice vouchers.
- **2-G:** Continue to work with the City’s Code Administration Department to identify suitable properties for rehabilitation, renovation, or demolition and new construction.

Impediment 3: Homelessness

The City of Hagerstown’s unhoused population has increased due to factors such as substance addiction, health, abuse, and financial losses. Beyond the impacts on persons who are unhoused or who are at risk of homelessness, this is a community issue that affects housing and community development.

Goal: In coordination with social service organizations, government agencies, and concerned citizens, the City will assist in providing services to prevent homelessness, assist in providing services to those experiencing homelessness, and assist in transitioning unhoused persons into decent, safe, sound and sanitary housing according to the “Housing First” model.

Strategies: In order to attain this goal, the following activities and strategies should be undertaken:

- **3-A:** Support the efforts of nonprofits, public safety departments, and government agencies in providing “No Wrong Door” services to unhoused and at-risk persons, including food and personal necessities, emergency shelter, financial and legal support, and physical and mental healthcare.
- **3-B:** Support efforts to create a day shelter for homeless individuals to obtain food, services, healthcare, and job training for employment.
- **3-C:** Support efforts to improve care and housing for individuals and families who are victims of domestic violence, abuse, stalking, trafficking and similar activities.
- **3-D:** Assist households through aid organizations with rent and mortgage assistance, security deposits, application fees, utility assistance, and legal aid to forestall homelessness and transition unhoused persons and households out of homelessness.
- **3-E:** Continue to assist in developing housing for placement of unhoused persons according to the “Housing First” model, which will allow them to seek employment and financial stability.

Impediment 4: Economic Improvement and Investment

The December 2024 unemployment rate in the City was 3.6%, but only 62.2% of residents age 16 or older participated in the labor force. The others are excluded by factors such as disability, age, or the need to provide childcare. Only 20% of workers have at least a bachelor's degree, which limits the majority's access to high-skill, high-paying jobs and limits employer efforts to attract local residents to high-paying positions in the City.

Goal: The City will expand and diversify its tax base by attracting new businesses and expanding existing industries, and will support job training and education efforts which will reduce unemployment, increase wages, and support residents in reentering and succeeding in the labor force.

Strategies: In order to attain this goal, the following activities and strategies should be undertaken:

- **4-A:** Support organizations and agencies that educate and train low- and moderate-income persons and other disadvantaged groups such as seniors and persons with disabilities, persons in substance abuse recovery programs, persons exiting incarceration, or unhoused persons.
- **4-B:** Support organizations and agencies that provide services such as childcare, equipment, and transportation which will allow persons to enter or reenter the workforce.
- **4-C:** Support organizations and agencies that are developing and expanding commerce and industry in the City of Hagerstown, in order to increase the tax base and employ more residents.
- **4-D:** Coordinate job placement efforts with public and private employers, with an emphasis on higher-paid career positions accessible to those without higher education.
- **4-E:** Continue existing initiatives such as the Façade Improvement Program and consider new initiatives to encourage investment by local entrepreneurs in disadvantaged areas of the City.

Impediment 5: Social Services

The City of Hagerstown has a reputation for high-quality social services, but they may not be easily accessible or meet the public's needs. There is a need to identify, improve, complement, and provide a central clearinghouse for social and human services.

Goal: Residents of the City of Hagerstown will be able to easily access equitable and effective social and human services through a “No Wrong Door” collaboration of nonprofits, healthcare providers, food access organizations, government agencies and other interested parties.

Strategies: In order to attain this goal, the following activities and strategies should be undertaken:

- **5-A:** Coordinate and support the efforts of nonprofits, non-governmental organizations, public safety departments, and government agencies in providing “No Wrong Door” services to persons in need, including food and necessities, emergency shelter, financial and legal support, and physical and mental healthcare.
- **5-B:** Identify and eliminate any gaps in human services, particularly in previously identified areas such as food access, transportation, mental health treatment, and childcare.
- **5-C:** Complement services provided by different nonprofit and government agencies to ensure that all gaps are filled, eliminate unnecessary duplication of services, and facilitate a seamless handoff between services and agencies.
- **5-D:** Conduct outreach and improve services for at-risk groups such as seniors, persons with disabilities, youth, persons with limited English proficiency, and victims of domestic violence or trafficking.

Impediment 6: Public Facilities, Infrastructure, and Services

Public facilities, infrastructure, roads, sidewalks, trails, and park facilities in the City of Hagerstown are not completely ADA accessible or sufficiently maintained. Many citizens wish to see the City improve its community outreach with a focus on public safety and creating safe and clean neighborhoods.

Goal: The City will continue to make physical and operational improvements to public facilities, thoroughfares, and lands, will address litter and blight, and will create safe and attractive neighborhoods.

Strategies: In order to attain this goal, the following activities and strategies should be undertaken:

- **6-A:** Continue to provide and improve parks and recreational facilities, programming, arts and entertainment, literacy, and community events to increase visitation and pride in the City.
- **6-B:** Invest in public infrastructure in low- and moderate-income areas including roads, sidewalks, trails, sanitary and storm sewers, utilities, and parks to improve safety and usability.
- **6-C:** Improve public safety by investing in emergency services, community policing, and code enforcement to reduce blighting influences.
- **6-D:** Improve community pride by investing in neighborhood cleanup and other programs to reduce blighting influences.
- **6-E:** Address transportation needs in and around the City through public transit and paratransit improvements, partnerships with transportation providers, and improvements to pedestrian, bicycle, and automotive infrastructure.



VI. Certification

Signature Page:

I hereby certify that this FFY 2025 Analysis of Impediments to Fair Housing Choice is in compliance with the intent and directives of the Community Development Block Grant (CDBG) Program and HOME Investment Partnership (HOME) Program regulations.

William B McIntire

Honorable William B. McIntire, Mayor
City of Hagerstown, MD

9/5/25

Date

VII. Appendices

Appendix A – Demographic Data

See the City of Hagerstown’s FFY 2025-2029 Five-Year Consolidated Plan and appendices for demographic data and sources relied upon in the preparation of the City’s 2025 Analysis of Impediments to Fair Housing Choice (AI).

Appendix B – Citizen Participation

See the City of Hagerstown’s FFY 2025-2029 Five-Year Consolidated Plan and appendices for citizen participation documentation including notices; summaries of stakeholder interviews, meetings, and hearings; resident survey responses; stakeholder questionnaire responses; and, public comments.