

## **NOTES ON UNDERSTANDING THE DRAFT CONSOLIDATED PLAN**

The State of Maryland has developed its new draft Consolidated Plan for the period July 1, 2015 through June 30, 2019.

Persons who are familiar with the Consolidated Plan will find this one very different from previous versions.

That is because HUD has moved the Plan from a written document to an (extensive) on-line fillable form. This form has a proscribed format, HUD provided data (that is not always correct, which we have noted were applicable) and was developed for entitlement jurisdictions, rather than States. Consequently, there will be times when items are not applicable, or where we've had to place the information requested in written text rather than in a HUD table due to flaws in the on-line tool where it simply doesn't work for States. (For example, Fair Market Rent information, which only allows for one market in the template while the State has numerous markets).

In addition, the on-line form version of the Con Plan severely limits the amount of space for discussions, so answers to some questions may be quite terse. In fact, the fillable form never allows for an answer, response, or discussion to any question or subject area to exceed a page (4,000 characters to be precise), no matter how complicated the subject. In addition, the entire document is password protected and exists within HUD's accounting system, so is only available to those with access to the system.

As a result of all this, in order to make the draft Plan public, as well as comprehensible for public review, we downloaded the form into a Word file, reformatted it, and provided answers to questions (such as the housing market at a State level) that are much longer than will be allowed in the final Plan. We will have to severely cut and edit some of these sections when uploading the individual discussion and submitting the final Plan to HUD. However, we have included expanded discussions in the draft Word version of the Plan so persons understand the issues and how DHCD reached some of the conclusions and goals in the Plan.

There is also much in the draft Plan that appears to be redundant. This is in part because of the design of the template, and in part because this particular document includes both a Five year Consolidated Plan (for the period July 1, 2015 through June 30, 2019) as well as an Annual Action Plan (for the period July 1, 2015 through June 30, 2016), where the policies in one are naturally echoed in the other. (Again, for persons not familiar with the Five Year Plan, the Five Year Plan sets over-arching goals, and Annual Action Plans set one year goals to achieve the five year goals. Consequently, if you look at the five year housing goals, the one year Action Plan goals basically represent one fifth of those goals, but the actions to achieve them remain the same – we will finance rental housing, provide tenant assistance, rehabilitate homes, etc.)

Lastly, because of new requirements, such as talking about CDBG-Disaster Recovery (CDBG-DR) funding that the State received in previous years, readers may notice some very odd skips in some discussions, such as a CDBG-DR discussion immediately following a discussion on Housing Choice Vouchers (AKA Section 8). These discussions are where we were required to put them in the template, and while odd juxtapositions, they are in the correct place according to HUD's office in Washington.