

Findings and Lessons Learned from Affordable Housing Compliance with Maryland Building Energy Performance Standards

Lauren Westmoreland, SK Collaborative

Alexander Jarrah, Stewards of Affordable Housing for the Future

Todd Nedwick, National Housing Trust

Madeleine McCullough, National Housing Trust

ABSTRACT

National Housing Trust, Stewards of Affordable Housing for the Future, and New Ecology launched the Maryland Clean Energy Capacity Building Program to assist affordable housing providers to comply with greenhouse gas emissions intensity (GHGI) targets set by the state's Building Energy Performance Standards (BEPS) policy. BEPS' targets require owners of covered buildings to reduce Scope 1 GHGI, with an initial target in 2030 and a final standard of net-zero Scope 1 emissions by 2040. The policy also requires property owners to benchmark and third-party verify property energy data.

This paper covers findings from the program, including affordable housing provider challenges with benchmarking, recapitalization timelines and financial limitations that conflict with BEPS' target schedule, and the significant risk that financial penalties for noncompliance poses to long-term property affordability and stabilization at a time of rising housing and utility costs. We find that of the 11 portfolios analyzed, affordable housing providers will pay over \$3.4 million in collective penalties over the course of the first compliance period if no alternative penalty scheme or compliance pathway is determined, threatening the affordability of 4,471 rental homes in the state. We conclude with lessons learned from the capacity building program, recommendations for proposed alternative compliance pathways for the affordable housing sector, and a comparison of alternative compliance pathways in other jurisdictions with building performance standards.

Introduction

State and local governments are increasingly turning to building performance standards to lower greenhouse gas emissions (GHG) and reduce energy consumption and costs in their existing building stock. In Maryland, the Climate Solutions Now Act of 2022 set a Building Energy Performance Standard (BEPS) requirement for residential buildings 35,000 square feet and greater to achieve carbon neutral Scope 1 emissions by 2040, with interim targets in 2030 and 2035. Scope 1 emissions are measured based solely on the emissions produced by the fossil fuel-fired equipment in buildings, and, as such, BEPS functions practically as an electrification requirement for covered buildings. Due to the novelty of building performance standards as a policy in both Maryland and other state and local jurisdictions, lessons, testimonials, and experiences of property owners seeking to comply with these policies are just beginning to emerge. This is especially true of the affordable housing sector, which faces hardships in complying with BEPS because of the unique regulatory landscape that applies to the sector, such as restrictions on accessing debt.

In 2025, National Housing Trust (NHT), Stewards of Affordable Housing for the Future (SAHF), and New Ecology, Inc. (NEI), with funding from philanthropy and assistance from Maryland state agencies, launched the Maryland Clean Energy Capacity Building Program to assist affordable housing providers with properties that have covered buildings that are subject to BEPS. The program’s goals were to set affordable housing providers up for success by providing them with educational webinars on BEPS, access to clean energy case studies and resources, and one-on-one technical assistance. For the purpose of this paper, affordable housing providers are defined as owners and/or managers of subsidized affordable multifamily housing properties, and are the responsible party that must demonstrate compliance with federal, state and local regulations.

In this paper, we provide a detailed overview of the Maryland Clean Energy Capacity program, highlight findings from the technical assistance offerings, and synthesize overall programmatic findings into lessons learned for state and local administrators of building performance standards to better encourage compliance and ensure long-term affordability of affordable housing properties.

Maryland BEPS: Requirements and Penalties

Maryland’s BEPS requires that multifamily housing 35,000 square feet and greater meet and maintain Scope 1 emissions intensity standards. BEPS’ emissions standard schedule is below:

Table 1. BEPS Emissions Reduction Requirements for Multifamily Housing

Compliance year	Scope 1 emissions intensity (kgCO ₂ e per square foot) requirement
2030	0.82
2035	0.41
2040	0.00

Given the policy’s sole focus on Scope 1 emissions, BEPS operates as an electrification requirement for existing buildings. That is, property owners must replace equipment and appliances that are fueled by fossil fuels, such as natural gas, with electric alternatives. Beyond reducing on-site emissions, BEPS also requires property owners with covered buildings to benchmark building energy data in ENERGY STAR® Portfolio Manager and submit energy data to the state annually. Beginning in 2026, all property owners must also have a credentialed third-party verify energy data for any covered buildings located on their properties; covered building data must be verified once every five years.

BEPS also imposes penalties (officially referred to as alternative compliance payments by the policy) on property owners for noncompliance. The penalties begin at \$230 per metric ton of carbon dioxide equivalent in excess of the emissions intensity standard in a given year. Penalties increase by \$4 per metric ton and are adjusted for inflation. The policy includes a provision that allows affordable housing providers to reduce penalties for noncompliance if they demonstrate a “good faith effort” to secure funding for energy efficiency and electrification upgrades, although the degree to which fines are reduced is not addressed in the policy or regulations.

BEPS regulations previously included a single energy use intensity (EUI) standard of 29 kBtu per square foot in 2040. While this provision was not included in the final regulations, the state has indicated it intends to adopt EUI requirements for buildings in 2027.

Maryland Clean Energy Capacity Building Program

The Maryland Clean Energy Capacity Building Program was a program developed by NHT and SAHF, and funded by a private funder, Invest in Our Future (IOF). The program offered participating affordable housing providers three technical assistance tracks. Providers could choose to participate in any and all tracks that they deemed relevant to their portfolio. NHT, SAHF, and NEI each led one of the three tracks. While the three tracks were distinct in their offerings and lead organization, together, the tracks served to provide providers with a holistic view of how to bridge the divide between BEPS as a policy and how compliance unfolds in practice. To ensure broad participation from affordable housing providers, avoid duplication of technical assistance and to share lessons learned, the team communicated regularly with Maryland state agencies, including the Maryland Energy Administration (MEA), the Department of Housing and Community Development (DHCD) and the Maryland Department of Environment (MDE).

Track 1, led by NHT, consisted of educational webinars that covered topics such as utility data collection and benchmarking best practices, BEPS policy requirements for covered multifamily buildings, programs and incentives to finance and fund electrification and energy efficiency retrofits, and other topics relevant to the affordable housing sector. Where applicable, NHT would include presenters from state agencies to allow for direct communication about programs, deadlines and funding.

SAHF led Track 2 technical assistance and provided portfolio-level analysis and support to providers. SAHF's technical assistance offering was twofold: first, helping providers set their properties up in ESPM and, second, using ESPM data to calculate the BEPS compliance status for each property and covered buildings on that property and estimating noncompliance penalties during the 2030 to 2035 compliance period.

In Track 3, NEI prepared preliminary electrification and energy efficiency scopes of work for one property for each participating provider. This technical assistance not only provided providers with a pathway to compliance but also introduced providers to new technologies and practices that can be replicated across their portfolio to help support compliance.

These three tracks are summarized in the following graphic:



Track 2: Portfolio-Level Technical Assistance Findings

In the following sections, we feature findings from the Track 2 of the program, including affordable housing provider challenges with benchmarking, recapitalization timelines and financial limitations that conflict with BEPS’ target schedule, and the significant risk that financial penalties for noncompliance poses to long-term property affordability and stabilization at a time of rising housing and utility costs.

Benchmarking: Challenges and Successes.

This section highlights findings related to assisting affordable housing providers benchmark their properties for the purpose of BEPS.

Affordable Housing Providers Need Assistance Setting Up Property Benchmarking

SAHF sought to help providers understand the risk that BEPS posed to their portfolio by estimating penalties for noncompliance. To do so, providers needed to have energy and GHG emissions data readily available. In some cases, SAHF found that providers had extensive experience with benchmarking in ESPM and had property-level energy data on-hand, while others were wholly unfamiliar with benchmarking, ESPM as a tool, data verification, and how to use property-level energy and emissions data to find properties that were noncompliant with BEPS and/or inefficient in general.

SAHF often educated property owners unfamiliar with benchmarking on the different platforms needed to comply with BEPS’ benchmarking requirements. There are three distinct platforms that affordable housing providers need to understand and navigate for BEPS: the state’s BEPS Portal, ESPM, and Exelon’s Energy Usage Data System (EUDS).¹ Each of these platforms serves a unique purpose, as described below:

¹ Our experience in the Maryland Clean Energy Capacity Building Program was limited to assisting affordable housing providers that were served by one of Exelon’s Maryland utilities including Baltimore Gas & Electric, Pepco, or Delmarva Power. The data connection platforms of other Maryland utilities may differ.

Table 2. Required Data Platforms for BEPS Compliance

Platform	Purpose
BEPS Portal	Lists covered buildings and provides a Unique Building Identifier for each covered property that is to be added to a property in ENERGY STAR® Portfolio Manager and shared with the state.
Exelon EUDS	Connects properties in ESPM to utility meter accounts and uploads both meter data and aggregated whole building data to ENERGY STAR® Portfolio Manager.
ENERGY STAR® Portfolio Manager	The main platform used to receive energy data from the utility and share the data with the state.

While the intended purpose of each platform was clear to affordable housing providers, the platforms may share terminology that can cause confusion. For example, the BEPS Portal provides buildings with a Unique Building Identifier (UBID) and the EUDS also provides a separate Building ID. This results in one property requiring two separate identifiers to comply with BEPS, and affordable housing providers sometimes assumed that one identifier was all that was needed. This issue, while minor in overall scope, highlights the need for better coordination between the relevant organizations.

Data Verification: Awareness, Education and Inaccuracies

Once properties were set up in ENERGY STAR® Portfolio Manager and receiving energy data, affordable housing providers assumed that if they followed the established process for BEPS compliance, whatever data they received from the utility was accurate, and therefore, energy benchmarking was complete. This, however, is not the case. In many instances, SAHF flagged properties that appeared to have missing or inaccurate data based on low property EUI and informed owners that they may need to contact their utility provider to resolve data inaccuracies. Some issues included missing natural gas meters, missing commercial meters in mixed-used properties, and incomplete historical utility data. ENERGY STAR® Portfolio Manager's platform is robust, and affordable housing providers were unfamiliar with downloading and reviewing individual meter data to be able to identify these issues. Additionally, terminology can result in confusion among owners, especially those who have not benchmarked before. For example, utility platforms, like Exelon's EUDS, may abbreviate whole-building data feeds as "WB" or "AGG" (for aggregated), but owners did not always know what these terms meant. Through this process, program partners learned of a deeper need for resources and tools oriented towards property owners to help them analyze, understand, and correct their property data, and ultimately make decisions on how to ensure compliance with BEPS and reduce the property's energy usage. Resolving these challenges is also important for ensuring that costs for third-party data verification, which will be required by BEPS and paid for by the property owner starting in 2026, remain as low as possible for affordable housing providers as the number of data inaccuracies or absences will require more reconciliation, and therefore a higher cost.

Portfolio Analysis: Determining Compliance Status, Estimated Fines, and Properties to Prioritize for Retrofits

Compliance Status and Estimated Fines Methodology

After receiving energy usage information from participating affordable housing providers and ensuring accuracy through review of ENERGY STAR® Portfolio Manager data, SAHF determined whether properties in providers' portfolios were compliant with BEPS' 2030 standards of 0.82 kgCO₂e per square foot. To note, SAHF did not have direct access to affordable housing providers' data in ENERGY STAR® Portfolio Manager, so SAHF calculated Scope 1 emissions intensity separately, but using the same methodology, and then benchmarked each property's emissions intensity against this standard. If the property was noncompliant with the 2030 standard, SAHF calculated estimated penalties for the property in the year 2030 and for every year until 2035 (when the standard becomes stricter) based on the property's excess on-site GHG emissions and multiplying this figure by penalty amount listed in the legislation.

Estimated penalties are one consideration that can help providers determine which properties to prioritize for electrification retrofits, but affordable housing, due to the complex regulatory structure, requires a closer examination. A key consideration in this regard is recapitalization timelines, when affordable housing is able to access new capital to fund property upgrades.² In interviews with providers and follow up data requests, SAHF received data on when affordable housing providers last recapitalized their properties or planned to recapitalize them in the near future and tied this into the analysis for which properties to prioritize for BEPS compliance.

Results

Overall, SAHF collected information from 11 affordable housing providers, totaling over 15,000 affordable housing units in 155 BEPS-covered buildings. Of these properties, 37 did not comply with BEPS' 2030 standard, 77 did comply, and 39 did not have sufficient data to comply.

In total, 4,471 units in 37 properties were not compliant with BEPS' 2030 standard. SAHF found that the average and median fines for a noncompliant property in 2030 are \$16,891 and \$11,630, respectively. Noncompliance fines in 2030 also encompassed a wide range, from as low as \$635 to as high as \$70,715. Cumulatively, the 11 affordable housing providers will pay \$658,766 in 2030 and \$3,408,399 from 2030 to 2035.

As a matter of motivating affordable housing providers to electrify their properties, BEPS' penalties, as written, fall into the middle ground of being great enough to threaten property net operating income (NOI) and the financial viability of the property but too insignificant to encourage investment in these properties. In several case studies, SAHF has found that average per unit costs to fully electrify affordable housing properties are between \$14,000 and \$16,000 *per unit*. These costs are comparable to the average annual fine *per property*. The greatest penalty per unit that SAHF recorded in a noncompliant property was \$2,326. This means that paying the fine may be the more economical decision for affordable housing providers, but they would also have no pathway to offset these costs. Furthermore, given

² Outside of recapitalization, it is nearly impossible for affordable housing to take on new debt due to investor and mortgage restrictions.

the policy’s “good faith” clause, fines for affordable housing could be reduced even further. This would serve to blunt some, but not all, of the financial impact of the penalties while conferring none of the benefits of electrification on affordable housing residents.

The threat of alternative compliance payments to NOI is due to the unique financial challenges and constraints facing affordable housing providers. Affordable housing providers participate typically in both state and federal housing programs that have strict rules that limit rents and tightly control how money can be used. Positive cash flow is often limited to begin with, before factoring in the costs of alternative compliance payments. Furthermore, when an affordable housing property earns additional revenue beyond its day-to-day expenses, that money may not go directly to the owner due to the extremely complicated financial structure of affordable housing. Instead, it is paid out in a very specific order, based on debt obligations to the property, with most of it spoken for before the owner ever sees a dollar. The distribution of cash flow is determined by legal and regulatory agreements with existing investors and government agencies. As an example, many affordable housing providers in Maryland utilize the Maryland Department of Housing and Community Development’s (MDHCD) Rental Works program, which provides gap financing for the purchase or development of affordable housing. Annual payments to MDHCD are up to 75% of the annual positive cash flow of the property³.

While BEPS currently lacks an EUI standard, state agencies have indicated their intention to adopt one in 2027. As an exercise, we determined how many properties were compliant with the previously proposed and now-rescinded standard of 29 kBtu per square foot. We found that 29 of the 155 properties included in the analysis complied with this standard. Notably, 40 out of 56 all-electric properties, which currently comply with the GHG emissions standards, do not comply with this site EUI standard. This would leave these properties potentially exposed to fines. Adopting the EUI standard at a later date may disrupt current planning for BEPS compliance or result in inefficient electric equipment being installed in affordable housing. In general, coupling a GHG and EUI target is preferred to ensure that decarbonization brings other benefits and prevents the installation of inefficient equipment, like electric resistance heating, that will significantly raise energy use and utility costs.

In addition to estimated penalties, SAHF collected information on refinancing timelines for noncompliant properties, as state and federal affordable housing regulations create a fifteen-year refinancing cycle⁴. SAHF found that 12 of 37 noncompliant properties had recapitalized since 2020. Without flexible midcycle funding that does not require refinancing, this means that, for these 12 properties, many of them would not be able to secure the capital necessary to fund BEPS-complying measures until 2035 at the earliest, as affordable housing timelines exist on a 15-year cycle. On a different yet related note, one affordable housing provider revealed that one property had recently replaced its furnace as part of an emergency repair in the winter and that this equipment would not be replaced during its useful lifespan simply in order to comply with BEPS. The experience of this provider underscores tension between BEPS’ policy goals and the responsibility of affordable housing providers to provide safe living conditions.

Public Housing Authority Utility Allowance Schedules Do Not Align with BEPS

³ Learn more about MDHCD Rental Works:

<https://dhcd.maryland.gov/HousingDevelopment/Pages/rhw/default.aspx>

⁴ Majority of affordable housing projects use the Low-Income Housing Tax Credit (LIHTC):

<https://www.novoco.com/resource-centers/affordable-housing-tax-credits/about-lihtc>

Residents of affordable housing receive a utility allowance to subsidize the cost of utilities for these homes. In some cases, affordable housing providers use utility allowance schedules that are determined by the local public housing authority (PHA). The local PHA will calculate and publish these utility allowances for both public housing and private affordable housing providers to use in determining total housing costs. Below are two examples from Maryland PHAs:

Utility Allowance Schedule

U.S. Department of Housing and Urban Development

Office of Public and Indian Housing

OMB Approval No. 2577-0169

exp. 04/30/2026

The following allowances are used to determine the total cost of tenant-furnished utilities and appliances.

LOCALITY/PHA			UNIT TYPE				DATE
Housing Commission of Anne Arundel County			Garden				7/1/2025
UTILITY OR SERVICE	MONTHLY DOLLAR ALLOWANCE						
	0-BR	1-BR	2-BR	3-BR	4-BR	5-BR	
HEATING							
a. Natural Gas	\$27	\$33	\$38	\$42	\$49	\$54	
b. Electric	\$37	\$47	\$55	\$66	\$78	\$87	
c. Heat Pump	\$22	\$27	\$32	\$39	\$46	\$51	
d. Fuel Oil	\$47	\$57	\$65	\$75	\$86	\$95	
e. Propane	\$55	\$66	\$76	\$87	\$100	\$110	
AIR CONDITIONING							
	\$17	\$23	\$28	\$37	\$46	\$54	
COOKING							
a. Natural Gas	\$10	\$11	\$13	\$14	\$15	\$15	
b. Electric	\$16	\$17	\$20	\$22	\$24	\$25	
c. Propane	\$22	\$23	\$27	\$29	\$32	\$33	
OTHER ELECTRIC							
	\$41	\$45	\$51	\$59	\$66	\$79	
WATER HEATING							
a. Natural Gas	\$15	\$20	\$26	\$36	\$48	\$59	
b. Electric	\$17	\$28	\$40	\$62	\$87	\$111	
c. Fuel Oil	\$23	\$32	\$40	\$56	\$74	\$92	
d. Propane	\$32	\$44	\$55	\$78	\$102	\$127	

Figure 1: Housing Commission of Anne Arundel County 2026 Utility Allowance Schedule that includes an option for heat pumps as a heating source. Source: Housing Commission of Anne Arundel County.

Utility Allowance Schedule

See Public Reporting and Instruction on back.

U.S. Department of Housing and Urban Development

Office of Public and Indian Housing

OMB Approval No. 2577-0169

exp. 7/31/22

The following allowances are used to determine the total cost of tenant-furnished utilities and appliances.

Locality/PHA			Unit Type		Date (mm/dd/yyyy)		
Montgomery County Housing Authority			End of Row - One Bedroom		10/01/2024		
Utility or Service	Fuel Type	Monthly Allowances					
		PECO	LANSDALE	PP&L	HATFIELD	MET-ED	
Heating	Natural Gas	\$21.00	\$21.00	\$21.00	\$21.00	\$21.00	
	Bottle Gas						
	Electric	\$82.00	\$84.00	\$72.00	\$83.00	\$87.00	
	Electric - Heat Pump						
	Fuel Oil	\$93.00	\$93.00	\$93.00	\$93.00	\$93.00	
	Other						
Cooking	Natural Gas	\$18.00	\$18.00	\$18.00	\$18.00	\$18.00	
	Bottle Gas						

Figure 2: Montgomery County Housing Authority Utility Allowance Schedule that does not include an option for heat pumps as a heating source. Source: Montgomery County Housing Authority.

As demonstrated in the two examples above, PHAs must follow HUD guidance, but are given broad authority to develop utility allowances that are most appropriate for their region, and they take into account the most typical HVAC equipment, utility costs and housing configurations. They are not required to provide specific heating allowances for heat pumps, and if a heat pump is installed in Montgomery County, the electric heating cost (which is significantly higher than natural gas) would be used for developing the utility allowance. For the owner, this means that they may be required to charge less rent for a unit with electric heating than a unit with natural gas. Therefore, electrifying space heating with heat pumps would mean requiring the owner to pay both a high upfront cost and the reduced rent, preventing the owner from recouping their cost.

To get around this disincentive, many PHAs have begun to include heat pumps as a separate heat source from both electric resistance and natural gas heating and setting the utility allowance amount for the heat pump as lower than that of both natural gas and electric resistance heating. As a result, owners are actually incentivized to install heat pumps because of the potential that they can raise rents. However, in SAHF's review of select PHA utility allowance schedules, many PHAs had yet to include heat pumps in their utility allowance schedules. This reveals a gap between state energy policy and local housing policy, where the former requires electrification, but the latter penalizes *efficient* electrification. Better coordination between state and local PHAs can help align incentives and policy.

Track 3: Property-Level Technical Assistance Findings

In this section, we discuss findings from Track 3's property-level technical assistance, led by NEI.

Electrical Capacity Poses a Major Cost and Infrastructure Barrier to Electrification

Properties undergoing electrification retrofits may need electrical upgrades to handle the added load. In Maryland, one affordable housing provider mentioned that, in a previous experience with an electrification retrofit, the provider also had to pay the utility for the grid infrastructure upgrade that would allow the building to receive the necessary electrical capacity. Requiring affordable housing providers to pay for grid infrastructure upgrades presents a major, and sometimes unforeseen, cost that will make BEPS compliance more difficult and more costly for providers.

Operations and Maintenance Costs Will Increase with BEPS-Complying Technology

Many of the affordable housing providers participating in the program were not familiar with the range of technologies needed to fully electrify a property nor the technologies that were best suited to Maryland's climate. Affordable housing providers were also not familiar with the new, emerging technologies, such as packaged window heat pumps, that are entering the market and providing electrification solutions to certain building types. Many of these new technologies have lower tolerances to less-than ideal operating environments and have increased operations and maintenance costs. As such, there will be an increased need for training and resources oriented towards maintenance staff and contractors to service and optimize new building systems.

Incentives are Not Sufficient to Cover Electrification Costs of Affordable Housing

NEI identified funding sources for participants that could cover the measures listed in the preliminary electrification and energy efficiency scopes of work. Maryland has several distinct and overlapping incentive programs that target these types of upgrades, including the Multifamily Energy Efficiency and Housing Affordable program and the Greenhouse Gas Reduction Program. While these programs provide significant funding, they often fall short in providing the level of assistance that affordable housing needs to comply with BEPS, especially for properties that are midcycle.

Recommendations for the State of Maryland and Other Jurisdictions with or Considering BEPS

Our experience with the Maryland Clean Energy Capacity Program provided several lessons learned and recommendations for the state, as well as other state and local jurisdictions that have adopted or are considering adopting BEPS. These recommendations were shared directly with MEA, MDE and DHCD.

- *Benchmarking systems should be intuitive for the layperson and support should be offered on an ongoing basis.* Participating affordable housing providers displayed a wide range of experience with benchmarking. State and local jurisdictions should offer resources, support, and assistance with benchmarking, especially as it relates to analyzing and understanding property energy and emissions data.
- *Increase incentives available to affordable housing providers, especially for comprehensive energy and electrification audits.* Maryland has several incentive programs that affordable housing can tap into to pay for upgrades. These programs can increase maximum funding caps to better serve the sector by providing properties that are midcycle with flexible funding.
- *Align affordable housing recapitalization and BEPS timelines.* Properties that have undergone a recent recapitalization should be exempt from penalties until their next recapitalization event. Jurisdictions can condition this exemption on the basis that BEPS-complying measures will be included in the scope of work for the recapitalization. Several jurisdictions with BEPS allow affordable housing providers to apply for compliance timeline adjustments to align with planned recapitalization (e.g. Colorado, Seattle, Boston, and Denver).
- *Include complementary EUI targets with Scope 1 emissions intensity targets to ensure energy efficient outcomes.* By itself, Scope 1 emissions intensity as a BEPS metric is one that encourages electrification rather than efficient electrification. For example, one participating affordable housing provider indicated their intention to replace fossil fuel heating equipment with electric resistance heating, which would significantly increase costs for residents, to avoid BEPS penalties. Without an EUI standard, owners may just invest in the cheapest equipment available to keep the property financially afloat, even if this equipment is costly to residents.
- *Ensure coordination between state agencies and local public housing authorities so incentives are aligned.* For some affordable housing providers that use local public housing authority utility allowance schedules, electrification can be a significant disincentive if heat pumps are not directly included in the schedule. Jurisdictions with

BEPS can consult with their local PHAs to ensure that property owners are not penalized for installing heat pumps.

Conclusion

The Maryland Clean Energy Capacity Building Program assisted several affordable housing providers to understand and prepare for BEPS compliance. In doing so, several lessons emerged from the program that could help ease the burden of compliance on affordable housing providers and ensure that residents and owners both benefit from the policy. Moving forward, ongoing technical assistance will be crucial to support the sector.