



# DRAFT

School Impact Analysis Regulations  
March 26, 2025

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# School Impact Analysis DRAFT Regulations

## Purpose

As directed by [Bill 31-24](#) and clarifying legislation [Bill 50-24](#), the Department of Planning shall adopt School Impact Analysis Regulations in accordance with [Article 3, Title 7](#) of the Baltimore County Code, 2015 Edition (the “Baltimore County Code”).

Pursuant to [Article 32, Title 6](#) of the Baltimore County Code, the purpose of these regulations is to require applicants, the Baltimore County Board of Education and certain Baltimore County agencies to submit sufficient information to the Department of Planning in order to determine the impact of development projects with a residential component on public school facilities.

## Definitions

The following words have the meaning stated in [Section 32-6-101](#) of the Baltimore County Code:

- (1) Applicant.
- (2) Development approval.
- (3) Dwelling.
- (4) Filing Date.
- (5) Residential development.

The following words have the meaning stated in [Section 32-6-103](#) of the Baltimore County Code:

- (1) Enrollment.
- (2) Overcrowded school district.
- (3) Redevelopment.
- (4) School.
- (5) State-rated capacity (SRC).

The following words have the meanings indicated.

- (1) “Approved plan” means:
  - a. an approved residential development (mobile homes and accessory apartments are considered residential developments);
  - b. an approved nonresidential development plan with a residential component;
  - c. a development plan for a planned unit development plan approved by the Hearing Officer in accordance with [§ 32-4-245](#) of the Baltimore County Code; or
  - d. a final redevelopment plan approved by the Director of Permits, Approvals and Inspections in accordance with [§ 430A.13](#) of the Baltimore County Zoning Regulations.
- (2) “Approved plan” does not include:
  - a. A housing facility or a portion of a housing facility that contains dwelling units that restrict occupancy to persons at least 55 years of age or older or to couples if

- one spouse is at least 55 years of age or older, and, in compliance with the Americans with Disabilities act, to any person, regardless of age, who has physical or developmental disabilities, which includes senior housing facilities, housing for the elderly, and elderly housing facilities, as defined in the Baltimore County Zoning Regulations;
- b. Emergency or transitional housing facilities—Sheltered housing for the handicapped or disabled and Community Care Centers, Nursing Homes, Continuing Care Facilities, and Assisted-Living Facilities, as defined in the Baltimore County Zoning Regulations;
  - c. Group Child Care Centers or Nursery Schools, as defined in the Baltimore County Zoning Regulations;
  - d. Subdivisions limited to three or fewer units;
  - e. University based retirement communities;
  - f. Veteran’s housing and treatment campuses;
  - g. Redevelopment projects that do not increase the number of dwelling units;
  - h. Purpose built student housing;
  - i. Homeless shelters, boarding homes or hotel or motel; or
  - j. Long-term care facilities.
- (3) “Conditional development approval” has the meaning stated in [§ 32-6-109](#) of the Baltimore County Code.
- (4) “Development Plan” has the meaning indicated in [§ 32-4-101](#) of the Baltimore County Code.
- (5) “Additional Capacity” means an addition, expansion, or renovation of an existing school that adds more seats or any other project or construction that may increase a school’s state-rated capacity or decrease a school’s enrollment.
- (6) “Cumulative approved development pupil yield” means the number of pupils estimated to be generated by all approved development that is not built out in a particular school district based on pupil yield factors established by the Committee on Public School Capacity and Baltimore County Board of Education.
- (7) “Projected pupil yield” means the number of pupils estimated to be generated by a development plan based on pupil yield factors established by the Committee on Public School Capacity and Baltimore County Board of Education.
- (8) “Net SRC” means the State Rated Capacity for a school district plus Additional Capacity minus seats from approved developments that are not built out in a particular school district and minus the seats projected for the specific development under review.
- (9) “School Utilization Report” means an annual report to be prepared by the Department of Planning that includes the current and projected utilization of each school as a percentage of the state-rated capacity for the current year and next three years, based on the current and projected state-rated capacity for the same timeframe as determined by the Baltimore County Board of Education and a map for each school districts that is currently or projected to be an overcrowded school which shows the overcrowded school district, adjacent school districts to the district and percentage of state-rated capacity and a projected change in utilization. The report must also consider anticipated additional seats of state-rated capacity for any school.

### Information to be provided by Baltimore County Board of Education

The Baltimore County Board of Education shall annually provide the Department of Planning the following information:

- (1) State-rated capacity for each school;
- (2) Anticipated additional seats of state-rated capacity for any school which the following is expected to be substantially complete in the next four years:
  - a. An addition, expansion, or renovation of an existing school; or
  - b. Any other project or construction that may increase a school's state-rated capacity or decrease a school's enrollment.
- (3) A countywide pupil yield table based on type of housing and number of bedrooms (relying on historic number of bedrooms by housing type data from the Department of Planning) to be updated at least every five years;
- (4) September 30th enrollments for all elementary schools, middle schools, and high schools;
- (5) Projected 10-year enrollments for all elementary, middle and high school districts;
- (6) A GIS layer of the current school district boundary for each school;
- (7) List of appropriated or funded capital projects by type (new, addition, expansion, renovation) that will add seats, number of seats that will be added and the proposed school year the seats will be added within the upcoming 4 years;
- (8) The detailed Capital Improvement Program and Capital Budget;
- (9) Any Funding Decisions of the Interagency Commission on School Construction;
- (10) Any approved plan that implements educationally sound programs or initiatives that will provide adequate capacity in an overcrowded school district for one of the following: grade realignment or assessment; schedule changes; magnet schools; special program locations; work-study programs; early graduation; registered internship or apprenticeship; dual enrollment program; or any program that would reduce enrollment; and
- (11) Any development that is included in current projections.

### Information to be provided by Department of Permits, Approvals and Inspects

The Department of Permits, Approval and Inspections shall provide the Department of Planning the following information for any proposed plan that has a residential component:

- (1) Project Name
- (2) Project Tracking Number
- (3) Filing Date
- (4) Approval Date
- (5) Active (Yes/No)
- (6) Expired (Date) (After nine years with extensions)
- (7) Residential Component (Yes/No)
- (8) Type and number of residential units proposed

### Information to be provided by Department of Housing and Community Development

The County Attorney, in consult with the director of the Department of Housing and Community Development shall issue a written opinion prior to plan approval stating the plan is necessary to meet the county's affordable housing requirements under the conciliation agreement (effective March 9, 2016).

The Department of Housing and Community Development shall provide the Department of Planning the following information:

- (1) Written Opinion

### Information to be provided by Department of Planning

The Baltimore County Department of Planning shall provide the following information:

- (1) Annual Utilization Report as defined in [Section 32-6-103](#)
- (2) Cumulative projected pupil yield from approved development
- (3) Approved Plan is exempt from APFO (Yes/No)
- (4) Reason approved plan is exempt from APFO
- (5) School Impact Analysis Run Date
- (6) School Impact Analysis Recommendation
- (7) Elementary, Middle and High School District which the development falls within
- (8) Project Build Out Date (Date last occupancy permit is approved for the build out of all residential units)
- (9) Date of when a project can proceed if placed on the overcrowded list and reason— school is no longer overcrowded or 4 years have elapsed following development plan approval

### Information to be provided by the Applicant

- (1) Number of residential units by type
- (2) Number of bedrooms in each residential unit by type
- (3) Projected Pupil Yield from the proposed development (using BOE Pupil Yield factors)

### Content of the School Impact Analysis

A school impact analysis by the Applicant shall, at a minimum, contain the following information on forms.

#### Form 1—Current and Three-Year Projected Enrollment

Form 1 shall include the following data:

- Project Name
- Project Tracking Number
- Filing Date
- Elementary, Middle and High School District which the development falls within

For the current year and three subsequent years:

- State Rated Capacity
- Projected Additional Capacity

- Cumulative projected pupil yield from approved development
- Projected Pupil Yield from the proposed development (Applicant using BOE factors for Pupil Yield)
- Net State Rated Capacity
- Enrollment and Projected Enrollment
- Number over or under capacity
- Percent over or under capacity

[See Appendix FORMS \(Form 1 Example\)](#)

Form 2—Projected Pupil Yield by Housing Type

Form 2 shall include the following data:

- Project Name
- Project Tracking Number
- Filing Date
- The number of units by housing type and number of bedrooms
- Based on the type of dwellings and number of bedrooms in the proposed development, projected pupil yield for the elementary, middle and high school districts impacted by the development plan. (Multiplying the BOE pupil yield factors by the number of units for that housing type)

Notes:

The Applicant may provide thorough data and justification to the Committee on Public School Capacity to demonstrate that the proposed project has a pupil yield less than that of the Baltimore County Board of Education, Pupil Yield Factors.

If the calculation of the number of pupils results in a number containing a fraction, the number of pupils shall be rounded to the next highest whole number.

The pupil yield by dwelling type and number of bedrooms will only be applied to the new dwelling units. Existing dwellings that will remain as part of the proposed development will not be included in the analysis.

[See Appendix FORMS \(Form 2 Example\)](#)

Form 3—Projected Pupil Yield from Current Approved Development Plans

The Department of Planning will compile a list of approved plans by school district. The list will also include an approved plan that has been granted an extension under § 32-4-261(b) of the Baltimore County Code.

The list will also contain the projected pupil yield for elementary, middle and high schools based on the dwelling type and number of bedrooms for the approved plans. This list will be used to sum the total approved plans pupil yield for each school district.

Form 3 shall include the following data:

School District Name

Project Name

Project PAI Number

Pupil Yield

Total pupil yield from all approved development for the specific school district

Notes:

If there are multiple approved plans for the same plan, the plan with the most pupil yield will be used.

An approved plan may be removed from the Approved Plan List, provided an occupancy permit was issued for all the new dwellings associated with the approved plan and that plan is considered built out.

[See Appendix FORMS \(Form 3 Example\)](#)

[Review and Action by the Department of Planning](#)

The Department of Planning shall review the School Impact Analysis submitted by the Applicant to verify the information and to determine compliance with the requirements of these regulations and [Article 32, Title 6](#) of the Baltimore County Code.

After review of the School Impact Analysis, the Department of Planning shall make its recommendation to the Hearing Officer or the Director of Permits, Approvals and Inspections as appropriate.

The date of final approval is the date of the hearing officer's hearing and not the decision date.

If a development plan is approved, the plan does not need to be reevaluated for school impacts if conditions change before the permitting process is underway.

Appendix (FORMS)

Form 1 Example:

**SCHOOL IMPACT ANALYSIS**  
Form 1  
Current and 3-Year Projected Enrollment  
Department of Planning

Project Name Wavey Way  
PAI Project Number 091234  
Development ID 1  
Filing Date 10/1/2024

**Current Enrollment**

School District	State Rated Capacity (SRC)	Additional Capacity*	Cumulative Approved Development Pupil Yield Totals**	Projected Pupil Yield this Development	Net SRC***	Current Enrollment	Current Enrollment Above or Below Net SRC	Current % of Net SRC
Arbutus Elementary	382	0	1	7	374	379	5	101%
Arbutus Middle	1,060	2	7	1	1054	847	-207	80%
Catonville High	1,011	4	15	1	999	983	-16	98%

**Year 1 Projected Enrollment**

School District	State Rated Capacity (SRC)	Additional Capacity*	Approved Development Pupil Yield Totals**	Projected Pupil Yield this Development	Net SRC***	Year 1 Projected Enrollment	Year 1 Above or Below Net SRC	Year 1 % of Net SRC
Arbutus Elementary	381	20	1	7	393	387	-6	98%
Arbutus Middle	1,060	1	7	1	1053	847	-206	80%
Catonville High	1,011	0	15	1	995	983	-12	99%

**Year 2 Projected Enrollment**

School District	State Rated Capacity (SRC)	Additional Capacity*	Approved Development Pupil Yield Totals**	Projected Pupil Yield this Development	Net SRC***	Year 2 Projected Enrollment	Year 2 Above or Below Net SRC	Year 2 % of Net SRC
Arbutus Elementary	382	0	1	7	374	400	26	107%
Arbutus Middle	1,060	1	7	1	1053	847	-206	80%
Catonville High	1,011	0	15	1	995	983	-12	99%

**Year 3 Projected Enrollment**

School District	State Rated Capacity (SRC)	Additional Capacity*	Approved Development Pupil Yield Totals**	Projected Pupil Yield this Development	Net SRC***	Year 3 Projected Enrollment	Year 3 Above or Below Net SRC	Year 3 % of Net SRC
Arbutus Elementary	480	30	1	7	502	425	-77	85%
Arbutus Middle	1,060	1	7	1	1053	847	-206	80%
Catonville High	1,011	0	15	1	995	983	-12	99%

\*An addition, expansion, or renovation of an existing school that adds more seats or any other project or construction that may increase a school's state-rated capacity or decrease a school's enrollment.  
\*\*Number of seats committed from an already approved development plan.  
\*\*\*The SRC plus additional capacity minus approved seats and the seats projected for this development.



Form 2 Example:

**SCHOOL IMPACT ANALYSIS**  
**Form 2**  
**Projected Pupil Yield by Housing Type**  
**Department of Planning**

Project Name	Test
PAI Project Number	091234
Filing Date	10/1/2024

**Projected Project Pupil Yield For Test**

Housing Type	Number of Units	Elementary School Pupils	Middle School Pupils	High School Pupils
Single Family Detached (3+ Bedroom)	30	6.61	0.60	0.08
Single Family Detached (2 Bedroom)	1	0.18	0.02	0.00
Single Family Detached (1 Bedroom)	0	0.00	0.00	0.00
Single Family Attached (3+ Bedroom)	0	0.00	0.00	0.00
Single Family Attached (2 Bedroom)	0	0.00	0.00	0.00
Single Family Attached (1 Bedroom)	0	0.00	0.00	0.00
Multi- Family (3+ Bedroom)	0	0.00	0.00	0.00
Multi- Family (2 Bedroom)	0	0.00	0.00	0.00
Multi- Family (1 Bedroom)	0	0.00	0.00	0.00
Total	31	6.79	0.62	0.09
<b>Rounded Total</b>		<b>7</b>	<b>1</b>	<b>1</b>

\*If the calculation of the number of pupils results in a number containing a fraction, the number of pupils shall be rounded to the next highest whole number

Form 3 Example:

# SCHOOL IMPACT ANALYSIS

## Form 3

### Projected Pupil Yield from Approved Development Plans Department of Planning

Project Name \_\_\_\_\_ Test \_\_\_\_\_  
PAI Project Number \_\_\_\_\_ 091234 \_\_\_\_\_  
Filing Date \_\_\_\_\_ 10/1/2024 \_\_\_\_\_

#### Arbutus Elementary District Approved Development Plans

Project Name	PAI Project Number	Approval Date	# of Pupils Elem School
Proj 1	091222	10/1/2022	5
Proj 2	091333	10/3/2023	11
Proj 3	091444	1/3/2024	9
			25

#### Arbutus Middle District Approved Development Plans

Project Name	PAI Project Number	Approval Date	# of Pupils Middle School
Proj 1	091222	10/1/2022	11
			11

#### Catonsville High District Approved Development Plans

Project Name	PAI Project Number	Approval Date	# of Pupils High School
Proj 1	091222	10/1/2022	8
			8

\*If the calculation of the number of pupils results in a number containing a fraction, the number of pupils shall be rounded to the next highest whole number