

2015 STATE OF NORTH CAROLINA ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE



**FINAL REPORT
NOVEMBER 13, 2015**

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Final Report

November 13, 2015

HAS YOUR RIGHT TO FAIR HOUSING BEEN VIOLATED?

If you feel you have experienced discrimination in the housing industry, please contact:

The United States Department of Housing and Urban Development

Address:

Office of Fair Housing and Equal Opportunity
Department of Housing and Urban Development
451 Seventh Street SW, Room 5204
Washington, DC 20410-2000

Telephone: (202) 708-1112

Toll Free: (800) 669-9777

Web Site: <http://www.HUD.gov/offices/fheo/online-complaint.cfm>

The North Carolina Human Relations Commission

North Carolina Human Relations Commission

116 West Jones Street, Suite 2109
Raleigh, North Carolina 27699-1318

Telephone: (919) 807-4420

Toll Free: 1 (866) 324-7474

FAX: (919) 807-4435

A printable complaint form is available at <http://www.doa.nc.gov/hrc/fairhousing.aspx>.

The Fair Housing Project of Legal Aid of North Carolina

Fair Housing Project

224 South Dawson Street
Raleigh, North Carolina

Telephone: 1 (855) 797-3247

Email: info@fairhousingnc.org

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EXECUTIVE SUMMARY

AI PURPOSE AND PROCESS

As a requirement of receiving funds under the Community Development Block Grant (CDBG), the HOME Investment Partnerships (HOME), and the Emergency Solutions Grant (ESG), states must submit certification of affirmatively furthering fair housing to the U.S. Department of Housing and Urban Development (HUD). This certification has three elements:

1. Complete an Analysis of Impediments to Fair Housing Choice (AI),
2. Take actions to overcome the effects of any impediments identified, and
3. Maintain records reflecting the actions taken in response to the analysis.

In the *Fair Housing Planning Guide*, page 2-8, HUD provides a definition of impediments to fair housing choice as:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices [and]
- Any actions, omissions, or decisions which have [this] effect.¹

The list of protected classes included in the above definition is drawn from the Federal Fair Housing Act, which was first enacted in 1968. However, state and local governments may enact fair housing laws that extend protection to other groups, and the AI is expected to address housing choice for these additional protected classes as well.

The AI process involves a thorough examination of a variety of sources related to housing choice, the fair housing delivery system, and housing transactions, particularly for persons who are protected under fair housing law.

The development of an AI also includes public input and review via direct contact with stakeholders, public meetings to collect input from citizens and interested parties, distribution of draft reports for citizen review, and formal presentations of findings and impediments, along with actions to overcome the identified impediments.

METHODOLOGY

As part of the consolidated planning process, and as a requirement for receiving HUD formula grant funding, the State of North Carolina is undertaking this AI to evaluate impediments to fair housing choice within the non-entitlement areas of the state. Residents of the State of North Carolina are protected from discrimination in housing choice by the Federal Fair Housing Act, which includes protections based on race, color, religion, national origin, sex, disability, and familial status². In addition, the North Carolina Fair Housing Act, which recognizes all of the protected classes identified in the Federal Fair Housing Act, extends additional protection by

¹ U.S. Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide*. Vol. 1, p. 2-8. http://www.hud.gov/offices/cpd/about/conplan/fairhousingexs/Module5_TopSevenAFFH.pdf

² 42 U.S.C.A. §3601

prohibiting discrimination in land-use decisions based on the fact that a prospective housing development will include affordable housing units.³

The purpose of this report is to determine current impediments to fair housing choice at work in non-entitlement areas of North Carolina and to suggest actions that the state can consider in order to overcome the identified impediments. Thus, this report represents only the first step in the three-part certification process.

This AI was conducted through the assessment of a number of quantitative and qualitative sources. Quantitative sources used in analyzing fair housing choice in the State of North Carolina included:

- Socio-economic and housing data from the U.S. Census Bureau,
- Employment data from the U.S. Bureau of Labor Statistics,
- Economic data from the U.S. Bureau of Economic Analysis,
- Investment data gathered in accordance with the Community Reinvestment Act,
- Home loan application data from the Home Mortgage Disclosure Act, and
- Housing complaint data from HUD.

Qualitative research included evaluation of relevant existing fair housing research and national and state fair housing legal cases. Additionally, this research included the evaluation of information gathered from several public input opportunities conducted in relation to this AI. This also included the 2015 North Carolina Fair Housing Survey and three Fair Housing Forums, held in Benson, Charlotte, and Hickory in early September of 2015.

Geographic analyses of racial and ethnic distribution were conducted by calculating race or ethnicity as the percentage of the total population of Census tracts throughout the state's non-entitlement areas and then plotting the data in geographic maps. For the purposes of this AI, maps were produced for several racial and ethnic groups based on both 2000 and 2010 Census data in order to examine how the concentrations of these populations changed over time. Five-year American Community Survey estimates from 2013 were also used for selected maps.

Ultimately, a list of potential impediments was drawn from these sources and further evaluated based on HUD's definition of impediments to fair housing choice, as presented on the previous page. Potential impediments to fair housing choice present within the state were identified; along with actions the State may consider in attempting to address possible impediments.

OVERVIEW OF FINDINGS

This AI includes a review of both public and private sector housing market contexts in non-entitlement areas of the State of North Carolina to identify practices or conditions that may operate to limit fair housing choice in the state. Analysis of demographic, economic, and housing data included in that review establish the context in which housing choices are made. Demographic data indicate the sizes of racial and ethnic populations and other protected classes; economic and employment data show additional factors in influencing housing choice;

³ N.C. Gen. Stat. §41A-4(g)

and counts of housing by type, tenure, quality, and cost indicate the ability of the housing stock to meet the needs of the state's residents.

The contextual analysis described above provides a foundation for detailed review of fair housing laws, cases, studies, complaints, and public involvement data. The structure provided by local, state, and federal fair housing laws shapes the complaint and advocacy processes available in the state, as do the services provided by local, state, and federal agencies. Private sector factors in the homeownership and rental markets, such as home mortgage lending practices, have a considerable influence on fair housing choice. In the public sector, policies and practices can also significantly affect housing choice.

Complaint data and AI public involvement feedback further help define problems and possible impediments to housing choice for persons of protected classes, and confirm suspected findings from the contextual and supporting data.

Socio-Economic Context

The population of the state's non-entitlement areas has grown by an estimated 16.5 percent since 2000, according to the latest Census Bureau estimate released in 2014. Between the 2000 and 2010 Census counts, the state's non-entitlement population grew by around 673,000, with much of that growth attributable to an increase in the number of residents aged 55 and over. The largest percentage of the non-entitlement population was 35 to 54 years in age; however, that percentage fell over the decade from 30 to 28.6 percent of the total population. By contrast the share of the population aged 65 and older grew at over twice the rate of the overall population.

More than three-quarters of the state's non-entitlement residents were white in 2000 and 2010; nevertheless, white residents declined as a share of the population from 77.3 to 75.3 percent in the decade following 2000. Slow growth among the black population also contributed to a decline in the share of black non-entitlement residents of around one percentage point, and black residents represented 16.3 percent of the non-entitlement population in 2010. At the same time, the number of residents identifying as "other", or who belonged to two or more racial groups, more than doubled over the decade: together, these residents accounted for 5.5 percent of the population in 2010. Similarly, Hispanic residents of all races more than doubled in number and grew as a share of the non-entitlement population by over three percentage points. In 2010, the Hispanic population represented 6.9 percent of the total population.

Both Hispanic and black residents tended to account for larger shares of Census tract populations in the east of the state, particularly in the inner coastal plain. Black residents were generally more concentrated in the northern and southern portions of the coastal plain, with Hispanic residents tending to concentrate in the central-inner coastal plain. There were also large concentrations of Hispanic residents observed in Census tracts near the center of the state, notably around Siler City and Sanford.

Residents with disabilities accounted for 22.9 percent of the non-entitlement population in 2000, and tended to be more highly concentrated in rural Census tracts than in more populous tracts closer to the state's entitlement areas. The same geographic pattern was observed in 2009-2013, when roughly 15.5 percent of the population was counted as living with some

form of disability. Note that the definition of disability employed by the Census Bureau in 2000 differed considerably from the one employed in 2008 and later. For that reason, the Census Bureau discourages direct comparisons between the two, and this definitional change may account for much of the apparent drop in the disability rate between 2000 and 2009-2013.

Growth in the non-entitlement labor force has been uneven, but largely positive, since 1990. The number of employed persons has also shown positive growth in most of the years within the same time period. However, that growth was punctuated by two periods of significant declines in the number of people working, the first beginning after 2000 and the second beginning after 2007. The latter period saw a more substantial drop in the number of employed workers and a corresponding spike in the unemployment rate, which reached 11.7 percent in 2010. However, the unemployment rate has declined steadily since February of that year, notwithstanding marked seasonal variation in unemployment.

As one might expect, the decline in the number of employed persons after 2007 coincided with a decline in the number of full- and part-time jobs in the state as a whole. Recent years have also seen a marked fluctuation in inflation-adjusted earnings for the average worker, as well as the inflation-adjusted income of the average state resident.

In the years since 2000, larger shares of households have moved into higher income brackets, and lower-income households have shrunk as a share of households overall. Nevertheless, turbulence in the labor market has contributed to a marked increase in the poverty rate throughout the state's non-entitlement areas, which grew from 12.5 percent in 2000 to 17.7 percent by 2009-2013. In both years, poverty rates in rural Census tracts along the inner coastal plain tended to be higher than in central, more populous Census tracts. The same was true of Census tracts in the south and west of the state.

Growth in the housing stock of the state's non-entitlement areas outpaced growth in the number of households, resulting in a 43.5 percent growth in the number of vacant units between 2000 and 2010. However, occupied units still accounted for a large majority, or 83.8 percent, of housing units throughout that area at the end of the decade. A majority of those occupied housing units were occupied by the people who owned them; however, there was a marked shift toward rental occupancy over the decade. Units that were rented or sold but not occupied accounted for a smaller share of vacant units at the end of the decade, while the share of units available for sale or rent grew. "Other vacant" units accounted for nearly a quarter of vacant units throughout the state's non-entitlement areas in 2010. These units tend to be more problematic than vacant units overall, as they are not available to the market place and may contribute to blight where they are grouped in close geographic proximity to one another. Though it was coastal and western Census tracts that saw the highest overall vacancy rates, "other vacant" units tended to represent a larger share of vacant units in central Census tracts, as well as those along the inner coastal plain.

As the housing stock grew between 2000 and 2009-2013, single-family housing units remained the dominant type of housing unit in the state's non-entitlement areas; these units represented 71.1 percent of the housing stock in recent estimates. Mobile homes also represented a relatively large percentage of housing units, at 20.4 percent in 2009-2013. However, this share represents a decline of three-percentage points over 2000. Meanwhile, apartment units have

come to account for a greater share of housing units: 4.6 percent in recent estimates, up from 3.6 percent in 2000.

Small households, or those including only one or two members, represented around 60 percent of all non-entitlement households, and this share grew over the decade. However, the state's non-entitlement areas also experienced a notable increase in the number of larger households, or those with five members or more.

In spite of this growth in the number of larger households, the percentage of households considered to be overcrowded or severely overcrowded fell after 2000, representing 2.3 percent of households in 2009-2013. Housing units are considered to be overcrowded if they include more than one resident per room.

Additional housing problems identified in Census and American Community Survey data relate to incomplete plumbing and kitchen facilities in housing units. Fewer than one percent of households were affected by either problem, though the percentage of units with incomplete kitchen facilities ticked up slightly between 2000 and 2009-2013, from 0.5 to 0.6 percent.

A more common problem was cost-burdened households, and this was, unfortunately, a problem that impacted a larger percentage of households in 2009-2013 than in 2000. Housing costs consumed more than 31 to 50 percent of household income in nearly 17 percent of households in 2009-2013, and an additional 13.5 percent of households were spending more than half of their monthly income on housing costs. Generally speaking, rental households were more impacted by cost-burdening than owner-occupied households, even those that were still under mortgage. Housing costs tended to be higher along the coast, in western Census tracts bordering on Tennessee, and in Census tracts surrounding the state's entitlement areas.

Review of Fair Housing Laws, Studies, and Cases

Residents of North Carolina's non-entitlement areas are protected from discrimination in the housing market by federal and state laws. The Federal Fair Housing Act provides the foundation for fair housing enforcement throughout the United States, prohibiting discrimination in a wide range of housing transactions on the basis of race, color, religion, national origin, sex, familial status, and disability. North Carolina also prohibits discrimination on these same bases in the state Fair Housing Act, and also prohibits discrimination in land-use decisions on the basis that a prospective housing development will include affordable housing units.

Housing law and jurisprudence has evolved considerably since the FHA was first enacted in 1968. The Fair Housing Amendments Act of 1988 added additional protections, strengthened the Act's relatively weak enforcement provisions, and gave the Department of Housing and Urban Development enhanced authority to enforce the Act. In addition, since the early 1970s the FHA has consistently been interpreted to apply to laws and policies that are apparently neutral with respect to protected class status, but which nevertheless "actually or predictably"⁴

⁴ *United States v. City of Black Jack, Missouri*, 508 F.2d 1179, 1184 (8th Cir. 1974) It was racial discrimination, specifically, that was at issue in this case.

result in discrimination. In 2013, HUD finalized a rule formalizing its interpretation of discriminatory effects liability under the FHA.

That interpretation was reaffirmed in a June 25, 2015 Supreme Court decision in *Texas Department of Housing and Community Affairs v. Inclusive Communities Project, Inc.* That case originated in a lawsuit against the Texas Department of Housing and Community Affairs (“the Department”) on the grounds that the process by which it awarded low income housing tax credits had the effect of concentrating affordable housing in areas with high concentrations of minority residents. In bringing the suit, the Inclusive Communities Project relied in part on the disparate impact theory, and it was that theory that the Department sought to challenge in asking the Supreme Court to hear the case. Ultimately, the Court held that individuals, businesses, and government agencies could be held liable for the disparate impacts of their policies.

Following on the heels of the Supreme Court decision, HUD announced a final rule significantly revamping its long-standing requirement to affirmatively further fair housing (AFFH). In developing and finalizing this rule, HUD has substantially revised the AFFH process by (1) replacing the analysis of impediments with the assessment of fair housing (AFH), (2) integrating fair housing planning into the consolidated planning process, and (3) providing a fair housing assessment tool and nationally standardized datasets, among other changes. Generally speaking, the new rule will apply to local entitlement jurisdictions that are due to begin their next five-year planning cycle in 2017 or later. For smaller entitlement jurisdictions, as well as states and insular areas, the new rule will apply to those set to begin their next planning cycle in 2018 or later. Until jurisdictions are required to submit an AFH, they are required to continue submitting analyses of impediments.

Under certain circumstances, the United States Department of Justice (DOJ) will file a fair housing complaint on behalf of residents who are suspected to have suffered a violation of fair housing law. The DOJ has filed six such complaints against housing providers throughout the state in the last ten years, one of which resulted in the largest monetary settlement ever assessed in a sexual harassment case brought under the Fair Housing Act, in which damages alone amounted to more than \$2.7 million. However, the DOJ complaints more commonly alleged discrimination on the basis of disability, often relating to failure to make reasonable accommodation or allow reasonable modifications.

In addition to the DOJ complaints, state agencies and organizations have also brought civil actions against housing providers, under state and federal law, for alleged discrimination in the housing market. Two of these cases related to land-use decisions, and one of them cited discrimination in land-use decisions based on the fact that a prospective development would consist of affordable units, a cause of action that is explicitly laid out in state, but not federal, fair housing law.

Fair Housing Structure

North Carolina residents who believe that they have been subjected to illegal discrimination in the housing market may file a complaint with the US Department of Housing and Urban Development (HUD), which has a regional office in Atlanta, Georgia. However, because HUD has deemed the state fair housing law to be substantially equivalent to the Federal Fair Housing

Act, HUD will generally refer complaints it receives from North Carolina residents to the North Carolina Human Relations Commission (NCHRC). The NCHRC, which enforces the North Carolina Fair Housing Act, collaborates with HUD under the Fair Housing Assistance Program (FHAP), under which the commission enforces state and federal fair housing laws, receiving reimbursement funding from HUD for its efforts.

In light of the fact that HUD has determined the federal and state Fair Housing Acts to be substantially equivalent, it is not surprising that HUD and the Human Relations Commission follow similar complaint procedures. North Carolina residents who wish to file a fair housing complaint with HUD or the Human Relations Commission may do so within a year of the most recent alleged violation at issue in the complaint. Once a complaint is lodged, HUD is required to complete the investigation within 100 days (the Commission has 90 days), unless it is impracticable to do so. During the investigation, HUD or the Commission will attempt to broker a conciliation agreement between the complainant and respondent (i.e., the person alleged to have committed the violation). If no agreement is reached, HUD or the Commission will determine whether or not the allegation amounts to a true instance of discrimination, and will issue a charge.

It is at this point that the procedures of HUD and the Human Relations Commission differ slightly. If the Commission determines that there is reasonable cause to believe that discrimination has occurred or will likely occur, it will require the two parties to attempt, where possible, to resolve the matter through conciliation or mediation before proceeding to an administrative hearing or civil action. Though HUD also attempts to resolve fair housing complaints through conciliation, the statutory conciliation process ends, at the federal level, when HUD determines whether or not the complaint has cause. If the HUD issues a charge of discrimination, the matter may proceed to an administrative hearing or civil action, depending on the wishes of the parties involved. The same is true of complaints filed with the Commission if the parties are unable to resolve the matter through conciliation.

Those who are found to have violated the state or Federal Fair Housing Act may be required to pay monetary damages and civil penalties, and to undertake a number of measures designed to prevent similar violations in the future, including training and the adoption of anti-discrimination policies.

The North Carolina Senate, in its version of the 2015 state budget, called for the elimination of the Human Relations Commission and the state Fair Housing Act. Though the Commission was not eliminated in the final version of the budget, passed in early September of 2015, it was designated for Continuation Review. The purpose of this review is to determine whether funding for the funds, agencies, or divisions designated will be continued, reduced, or eliminated. The Human Relations Commission, along with other agencies identified for continuation review, are required to conduct those reviews and present preliminary findings by December 1, 2015. The final reports from the Continuation Review are due by April 1, 2016.

In addition to the federal and state governmental agencies discussed above, North Carolina residents are served by the Fair Housing Project of Legal Aid NC. In addition to providing complaint intake and fair housing testing, the organization also conducts research into fair housing and predatory lending in the state and provides outreach and education to residents and stakeholders throughout the state.

Fair Housing in the Private Sector

A number of factors affect the housing choices available to residents of North Carolina's non-entitlement areas: such factors include patterns in home purchase and small business lending, perceived and actual discrimination in the housing market, and policies and practices of individuals and businesses in the housing market. For the present study, assessment of these factors was undertaken through a review of lending data collected from the Federal Financial Institutions Examination Council (FFIEC); complaint data collected by federal and state agencies and organizations; and the 2015 State of North Carolina Fair Housing Survey.

Banks and other lending institutions handled 3.7 million loans in the state's non-entitlement areas from 2004 through 2013, of which 1.4 million were home-purchase loans. Around 84.2 percent of these home purchase loans were intended to finance the purchase of a home in which the applicant intended to live, and around 570,000 applicants successfully secured a new loan on a home.

However, 22.8 percent of home loan applications were denied between 2004 and 2013, and the rate of loan denials has gone up in recent years. Moreover, applicants were more likely to be denied if they were female than if they were male, black than if they were white, and Hispanic than if they were non-Hispanic. The gap between denial rates for female and male applicants, 7.6 percentage points on average, ranged from 4.5 to 13.2 percentage points, depending on the year, and has been relatively wide in recent years. The denial rate for black applicants, at 40.1 percent over the ten-year period, was more than twice that of white applicants. Similarly, Hispanic applicants faced a denial rate that was over nine percentage points higher than the denial rate for non-Hispanic applicants.

Credit history was a common reason for loan denials, as was the applicant's debt-to-income ratio, so it is no surprise that denial rates tended to fall as the income of the applicant rose. However, disparities in loan denial rates by sex, race, and ethnicity tended to persist even when income was taken into account. For example, black applicants earning \$60,000 to \$75,000 per year were still around twice as likely to be turned down as white applicants in the same income range. Meanwhile, the denial rate for Hispanic applicants in that income range was 19.4 percent, more than five percentage points higher than the denial rate for non-Hispanic applicants who were similarly situated with respect to income.

In some cases, successful loan applicants were issued loans with comparatively high annual percentage rates. These high-cost "HALs" represented 12.1 percent of loans issued from 2004 through 2013. HAL rates were considerably higher in 2005 and 2006, but have fallen dramatically since that time. By 2009, the HAL rate had fallen below 5 percent.

However, as was the case with denied home loan applications, borrowers in the state's non-entitlement areas were impacted differently by high-cost lending according to their race or ethnicity. Around 24 percent of loans issued to black borrowers over the ten-year period were HALs, compared to a HAL rate of 10.4 percent for white borrowers. Similarly, nearly 20 percent of loans issued to Hispanic borrowers were HALs, compared to a HAL rate of 11.2 percent for non-Hispanic borrowers.

Geographically speaking, residents of rural Census tracts were more likely to be denied a loan and, if they were successful in their loan application, to be issued high-cost loans. This was particularly true along the inner coastal plain, though denial rates and HAL rates generally tended to be higher in Census tracts that lay further from entitlement communities or the state's barrier islands.

Analysis of small business lending indicates that lenders were generally more active in middle- to high-income Census tracts, with relatively few small business loans or loan dollars going to low- and moderate-income Census tracts. Geographically, this generally meant that small business lending tended to focus on areas around the state's entitlement jurisdictions and coastal areas, and to bypass more sparsely populated rural tracts in the north and south of the state, and especially along the inner coastal plains.

Fair housing complaints filed with the Department of Urban Development and the North Carolina Human Relations Commission most commonly cited perceived racial discrimination, followed by discrimination on the basis of disability. Disability-based discrimination figured in a majority of complaints filed with the Fair Housing Project, which has accepted many disability-related complaints that are not ultimately filed with HUD or the North Carolina Human Relations Commission, either because they represent ongoing litigation or because they are resolved before the issue rises to the level of formal complaint. Discrimination in the rental housing market figured prominently among HUD complaints, as did failure to make reasonable accommodation. HUD and NCHRC complaints were rarely found to have cause; more commonly they were resolved through settlement or conciliation. However, a majority of HUD complaints were found to be without cause, as were around 48 percent of complaints filed with the Human Relations Commission.

Responses of state residents and stakeholders to the 2015 North Carolina Fair Housing Survey indicate that respondents were more likely to be aware of potential fair housing issues and questionable practices in the rental housing market and mortgage and home lending industry than in other areas. Those who elaborated on their responses by providing additional commentary highlighted perceived discrimination on the basis of race, sex, and familial status, as well as the challenges stemming from an overall lack of affordable housing.

Fair Housing in the Public Sector

Fair housing choice in the state's non-entitlement areas is impacted by a number of factors in the public sector, including the extent and distribution of publicly-subsidized housing units; land-use and zoning laws, policies, and practices; and the provision of government services, among others.

Assisted units, whether subsidized directly by HUD or through low-income housing tax credits, were widespread in the state, though they tended to be clustered along major transportation corridors and around cities.

Respondents to the 2015 Fair Housing Survey were more likely to be aware of fair housing issues when considering land-use policies, zoning laws, and access to government services than other areas of the public sector. Over 17 percent of respondents maintained that they were aware of potential barriers to fair housing choice in land-use decisions, while over a fifth

cited questionable practices in zoning laws. In both cases, respondents who provided additional commentary cited local policies that serve to limit the placement of affordable housing units to low-income areas of the community. Finally, around one third of respondents highlighted limited access to government services, with many citing a need for greater access to public transit and employment services.

Public Involvement

During the 2015 AI process, the State sought the participation of residents and stakeholders through the 2015 Fair Housing Survey and a series of Fair Housing Forum presentations held in the state from the 8th through the 10th of September 2015.

Property managers and service providers accounted for relatively large shares of the 526 respondents to the 2015 North Carolina Fair Housing Survey, and most considered themselves to be at least somewhat familiar with fair housing laws. A majority of respondents were homeowners, though around 18 percent identified themselves as renters and 28.2 percent as “other”.

Respondents overwhelmingly agreed that fair housing laws serve a useful purpose, but were more divided on other aspects of fair housing law. A sizeable minority of respondents found fair housing laws to be difficult to understand or follow, and respondents were more or less evenly divided on the question of whether fair housing protections ought to be extended to other groups. Those who did favor including additional protections cited sexual orientation, income, and criminal history as protected classes. Just fewer than 30 percent of respondents felt that fair housing laws are not adequately enforced at present.

A majority of respondents were aware of available fair housing training opportunities, and 219 of the 526 respondents noted that they had participated in such training. Fewer respondents were aware of any fair housing testing, and those who weighed in on current levels of outreach, education, and testing tended to agree that those levels were insufficient.

In addition, the degree to which survey respondents were aware of which groups were protected under federal and state law varied considerably depending on the group in question. More than half of respondents, excluding missing responses, were aware that federal and state laws included fair housing protections based on gender, religion, family status, and national origin. Fewer respondents were aware that those laws also protect individuals based on their color, and a number of respondents identified classes that are not protected under state or federal law, including age and sexual orientation.

Around 21 percent of respondents were aware of a local, i.e., city or county, fair housing ordinance, regulation, or plan. Around 19 percent of respondents felt that they could identify geographic areas with fair housing problems, with many citing rural areas of the state as an example.

The State encouraged public participation during the AI process through a series of Fair Housing Forum presentations, held in Benson, Charlotte, and Hickory from September 8th through 10th of 2015. These presentations had two purposes: The first was to present state residents and stakeholders with the most current findings to date from the AI process. The

second was to encourage discussion on the trends and issues identified. Topics discussed during the forum presentations included fair housing requirements for local grantees, lack of understanding of fair housing law and policy, fair housing challenges relating to income and disability, and methods to improve outreach efforts and promote participation in fair housing education and training sessions.

Finally, the State sought the input of stakeholders and citizens during the public review process by holding a public review meeting on November 3, 2015. The purpose of this meeting was to review the AI findings and present the identified impediments to fair housing choice for discussion, along with the actions proposed to address those impediments.

IMPEDIMENTS TO FAIR HOUSING CHOICE AND SUGGESTED ACTIONS

Private Sector Impediments, Suggested Actions, and Measurable Objectives

Impediment 1: Discrimination in the rental housing market on the basis of race and disability. This impediment was identified through review of responses to the 2015 North Carolina Fair Housing Survey and complaints filed with the Department of Housing and Urban Development (HUD), and in consultation with participants in the 2015 Fair Housing Forum meetings.

Action 1.1: In partnership with the Housing Finance Agency (HFA), enhance education and outreach efforts targeting consumers and providers of housing in the state's non-entitlement areas.

Measurable Objective 1.1: The number of outreach and education sessions offered and the number of participants.

Impediment 2: Lack of reasonable accommodation and modification. This impediment was identified through review of responses to the 2015 North Carolina Fair Housing Survey and complaints filed with the Department of Housing and Urban Development (HUD), and in consultation with participants in the 2015 Fair Housing Forum meetings.

Action 2.1: In partnership with the HFA, enhance targeted outreach and education efforts for housing providers, highlighting legal rights and obligations relating to reasonable accommodation and modification.

Measurable Objective 2.1: The number of outreach and education and action sessions offered and the number of participants.

Impediment 3: Lack of understanding of fair housing law in rural areas of the state, both among housing consumers and housing providers. This impediment was identified in review of responses to the 2015 North Carolina Fair Housing Survey and in consultation with participants in the 2015 Fair Housing Forum meetings.

Action 3.1: In partnership with the HFA, enhance outreach and education efforts targeting consumers and providers of housing in rural areas of the state, focusing on rights and obligations under the Federal Fair Housing Act and the North Carolina Fair Housing Act.

Measurable Objective 3.1: The number of outreach and education and action sessions offered and the number of participants.

Impediment 4: Black and Hispanic residents experience higher rates of home purchase loan denials than white and non-Hispanic residents, leading to lower rates of homeownership.

This impediment was identified through a review of data gathered under the Home Mortgage Disclosure Act (HMDA) and responses to the 2015 North Carolina Fair Housing Survey.

Action 4.1: In partnership with the HFA, and with the participation of the Department of Commerce, convene a homeownership workgroup to identify ways to overcome disproportionately low homeownership rates among black and Hispanic residents. Task the workgroup with the identification of potential avenues to improve financial literacy, address lack of understanding of credit, loans, and lending, and any other challenges the workgroup may uncover.

Measurable Objective 4.1: The establishment of the homeownership workgroup, the identification of challenges to homeownership, and suggestions of ways to improve homeownership rates among black and Hispanic residents.

Public Sector Impediments, Suggested Actions, and Measurable Objectives

Impediment 1: Limited fair housing infrastructure serving rural state residents. This impediment was identified through a review of the organizations and agencies dedicated to promoting fair housing choice in the state, as well as in consultation with the Fair Housing Project of Legal Aid NC.

Action 1.1: In partnership with the HFA and Department of Commerce, contract with state and local Fair Housing Initiative Program (FHIP) participants to conduct outreach and education activities in rural areas of the state.

Measurable Objective 1.1: The hiring of FHIP organizations and the number of outreach and education sessions that they conduct.

Impediment 2: Limited understanding of duty to affirmatively further fair housing. This impediment was identified through review of responses to the 2015 North Carolina Fair Housing Survey and in consultation with participants in the 2015 Fair Housing Forum meetings.

Action 2.1: Require prospective sub-grantees of Community Development Block Grant (CDBG) funding to complete fair housing training. As funding applications from local jurisdictions are considered and scored, award additional points to those whose officials have completed fair housing training.

Measurable Objective 2.1: The establishment of a fair housing training requirement for local CDBG sub-grantees and the development of additional scoring criteria for local jurisdictions whose officials complete fair housing training.

Action 2.2: Require a letter from sub-grantees certifying that they will administer CDBG funding in a manner consistent with the findings and objectives of the state AI.

Measurable Objective 2.2: The number of letters received from CDBG sub-grantees.

Action 2.3: In lieu of requiring local jurisdictions to complete an AI, employ resources to conduct fair housing activities, including outreach, education, and training.

Measurable Objective 2.3: The amount of money and other resources dedicated to providing fair housing outreach, education, and training.

Action 2.4: The DOC will continue to monitor fair housing activities for grantees.

Measurable Objective 2.4: Records of fair housing activities conducted by local jurisdictions.

Impediment 3: Lack of understanding of fair housing law by units of local government in non-entitlement areas. This impediment was identified through a review of responses to the 2015 North Carolina Fair Housing Survey and in consultation with participants in the 2015 Fair Housing Forum meetings.

Action 3.1: The Department of Commerce will contract with state and local FHIP organizations to provide fair housing outreach, education, and training to local government officials.

Measurable Objective 3.1: The number of FHIP organizations hired, the number of fair housing outreach, education, and training sessions conducted, and the number of units of local government whose officials participate in those sessions.

SECTION I. INTRODUCTION

Title VIII of the 1968 Civil Rights Act, also known as the Federal Fair Housing Act, made it illegal to discriminate in the buying, selling, or renting of housing based on a person's race, color, religion, or national origin. Sex was added as a protected class in the 1970s. In 1988, the Fair Housing Amendments Act added familial status and disability to the list, making a total of seven federally protected classes. Federal fair housing law and policy are largely outlined in the following three pieces of U.S. legislation:

1. The Fair Housing Act,
2. The Housing Amendments Act, and
3. The Americans with Disabilities Act.

The purpose of fair housing law is to protect a person's right to own, sell, purchase, or rent housing of his or her choice without fear of unlawful discrimination. The goal of fair housing law is to allow everyone equal access to housing.

WHY ASSESS FAIR HOUSING?

Provisions to affirmatively further fair housing are long-standing components of the U.S. Department of Housing and Urban Development's (HUD's) housing and community development programs. These provisions come from Section 808(e)(5) of the Federal Fair Housing Act, which requires that the Secretary of HUD administer federal housing and urban development programs in a manner that affirmatively furthers fair housing.

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single planning process. This action grouped the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Solutions Grants (ESG)⁵, and Housing Opportunities for Persons with AIDS (HOPWA) programs into the Consolidated Plan for Housing and Community Development, which then created a single application cycle.

As a part of the consolidated planning process, states and entitlement communities that receive such funds as a formula allocation directly from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing. The State of North Carolina includes twenty-four entitlement cities and three entitlement counties that receive funding in the form of Community Development Block Grants (CDBG), and two counties that receive funding under the HOME program. A complete list of entitlement cities and counties in the state is included in Table I.1 on the following page.

The AFFH certification process has three parts:

1. Complete an Analysis of Impediments to Fair Housing Choice (AI),
2. Take actions to overcome the effects of any impediments identified through the analysis, and

⁵ In 1994, the Emergency Solutions Grants program was called the Emergency Shelters Grants program.

3. Maintain records reflecting the analysis and actions taken.

In the *Fair Housing Planning Guide*, page 2-8, HUD notes that impediments to fair housing choice are:

- “Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices [and]
- Any actions, omissions, or decisions which have [this] effect.”⁶

Table I.1
Entitlement Areas of North Carolina

The State of North Carolina
2015 HUD Grantee Data

Cities		Counties	
Asheville	Greensboro	Rocky Mount	Cumberland County
Burlington	Greenville	Salisbury	Mecklenburg County
Cary	Hickory	Wilmington	Wake County
Chapel Hill	High Point	Winston-Salem	Surry County
Charlotte	Jacksonville		Orange County
Concord	Kannapolis		
Durham	Lenoir		
Fayetteville	Morganton		
Gastonia	New Bern city		
Goldsboro	Raleigh		

State and local governments may enact fair housing laws that extend protection to other groups as well. As noted previously, North Carolina General Statutes, at §41A-4(g), include fair housing protections for all of the groups identified under federal law while extending additional prohibitions on discrimination in land-use decisions on the basis that prospective housing developments will include affordable housing units. A list of protected classes under federal and state law is presented in Table I.2 below.

Table I.2
Comparison of Fair Housing Laws

Federal and State-level Fair Housing Laws

Protected Group	Federal Fair Housing Act	State Fair Housing Act
Race	X	X
Sex	X	X
Religion	X	X
Familial Status	X	X
Disability	X	X
National Origin	X	X
Color	X	X
Affordable Housing (In Land-Use Decisions)		X

It is essential to distinguish between fair housing and housing production. As discussed above, fair housing protections at the federal level do not include consideration of income and do not address housing affordability outside the context of housing discrimination. While lack of affordable housing can be a significant concern to policymakers, it is not, on its own, a fair

⁶ *Fair Housing Planning Guide*.

housing problem unless members of protected classes face this issue disproportionately. In fact, a large increase in affordable units in close proximity to one another can contribute to a problem for fair housing choice in some cases, such as the concentration of racial or ethnic minorities.

PURPOSE OF THIS RESEARCH

HUD interprets the broad objectives of affirmatively furthering fair housing to include:

- “Analyzing and working to eliminate housing discrimination in the jurisdiction;
- Promoting fair housing choice for all persons;
- Providing opportunities for racially and ethnically inclusive patterns of housing occupancy;
- Promoting housing that is physically accessible to, and usable by, all persons, particularly individuals with disabilities; and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.”⁷

The objective of the 2015 AI process was to research, analyze, and identify prospective impediments to fair housing choice throughout non-entitlement areas of the state. The goal of the completed AI is to suggest actions that the State can consider when working toward eliminating or mitigating the identified impediments in its non-entitlement areas.

LEAD AGENCY

The agency that led the effort of preparing this report on behalf of the State of North Carolina was the North Carolina Department of Commerce.

Commitment to Fair Housing

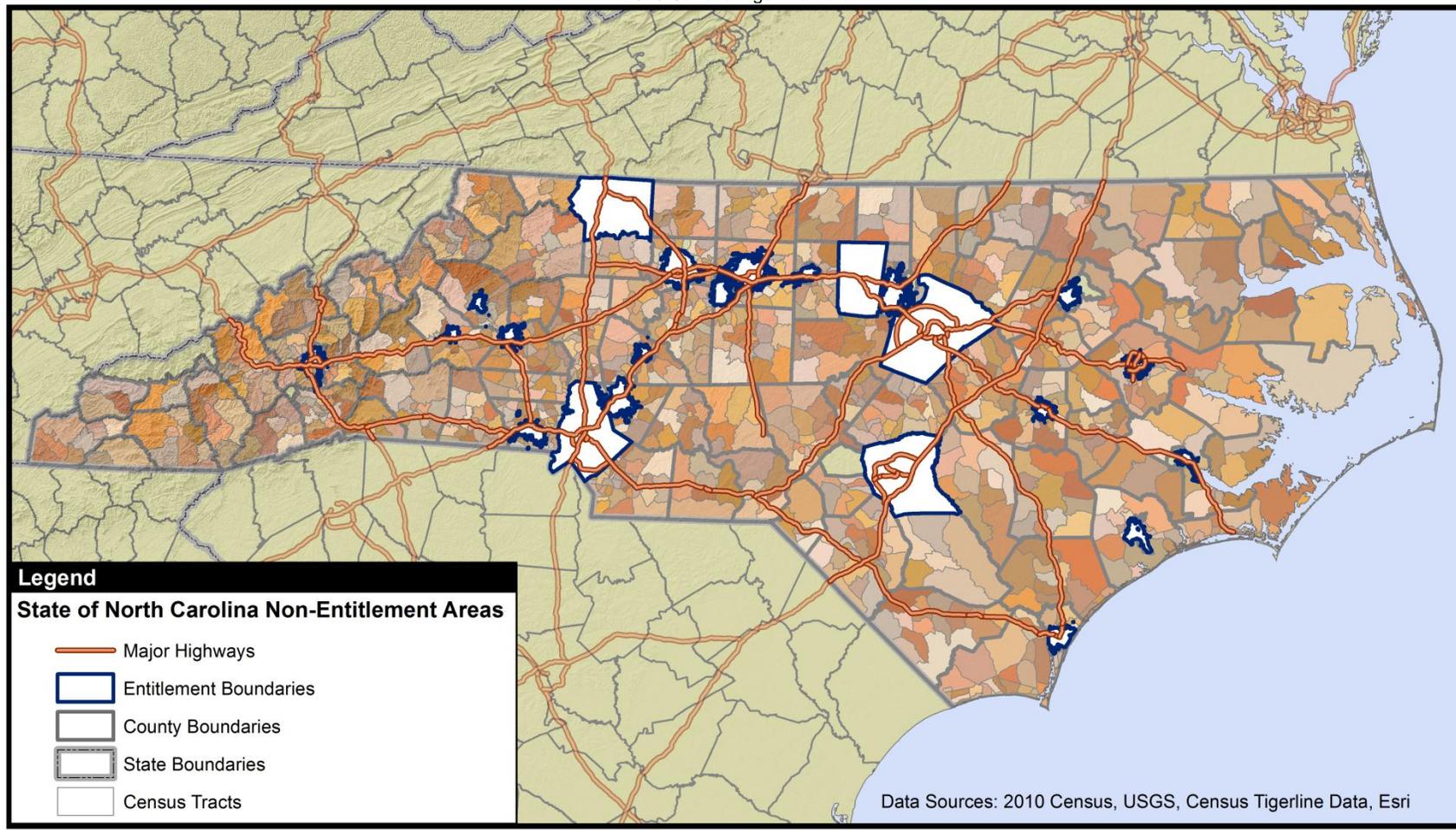
In accordance with the applicable statutes and regulations governing the Consolidated Plan, the State certifies that it will *affirmatively further fair housing*. This statement means that they have conducted an AI, will take appropriate actions to overcome the effects of any impediments identified through that analysis, and will maintain records that reflect the analysis and actions taken in this regard.

GEOGRAPHIC SCOPE OF THE ANALYSIS

This AI addresses the status of fair housing within non-entitlement areas of the State of North Carolina. Accordingly, data from the entitlement cities list in Table I.1 have been excluded from this analysis. Map I.1 on the following page, displays the State of North Carolina along with the areas encompassed by the 29 entitlement jurisdictions, which are white on this map.

⁷ *Fair Housing Planning Guide*, p.1-3.

Map I.1
North Carolina Study Area
Non-Entitlement Areas of North Carolina
2010 Census Tigerline Data



RESEARCH METHODOLOGY

The AI process involves a thorough examination of a variety of data related to housing, particularly for persons who are protected under fair housing laws. AI sources include Census data, employment and income information, home mortgage application data, business lending data, fair housing complaint information, surveys of housing industry experts and stakeholders, and related information found in the public domain. Relevant information was collected and evaluated via four general approaches:

1. *Primary Research*, or the collection and analysis of raw data that did not previously exist;
2. *Secondary Research*, or the review of existing data and studies;
3. *Quantitative Analysis*, or the evaluation of objective, measurable, and numerical data; and
4. *Qualitative Analysis*, or the evaluation and assessment of subjective data such as individuals' beliefs, feelings, attitudes, opinions, and experiences.

Some baseline secondary and quantitative data were drawn from the Census Bureau, including 2000 and 2010 Census counts, as well as American Community Survey data averages from 2009 through 2013. Data from these sources detail population, personal income, poverty, housing units by tenure, cost burdens, and housing conditions. Other data were drawn from records provided by the Bureau of Labor Statistics, the Bureau of Economic Analysis, and a variety of other sources. The following narrative offers a brief description of other key data sources employed for the 2015 AI for the State of North Carolina.

Home Mortgage Disclosure Act Data

To examine possible fair housing issues in the home mortgage market, Home Mortgage Disclosure Act (HMDA) data were analyzed. The HMDA was enacted by Congress in 1975 and has since been amended several times. It is intended to provide the public with loan data that can be used to determine whether financial institutions are serving the housing credit needs of their communities and to assist in identifying possible discriminatory lending patterns. HMDA requires lenders to publicly disclose the race, ethnicity, and sex of mortgage applicants, along with loan application amounts, household income, the Census tract in which the home is located, and information concerning prospective lender actions related to the loan application. For this analysis, HMDA data from 2004 through 2013 were analyzed, with the measurement of denial rates by Census tract and by race and ethnicity of applicants the key research objectives. These data were also examined to identify the groups and geographic areas most likely to encounter higher denial rates and receive loans with unusually high interest rates.

Fair Housing Complaint Data

Housing complaint data were used to analyze discrimination in the renting and selling of housing. HUD provided fair housing complaint data for the State from 2004 through 2014. This information included the basis, or protected class cited to the complaint; the issue, or prospective discriminatory action; and the closure status of the complaint, or the result of the investigation. The review of 514 fair housing complaints filed with HUD from within non-entitlement areas of the state allowed for inspection of the tone, the relative degree and frequency of certain types of unfair housing practices, and the degree to which complaints

were found to be with cause. Analysis of complaint data focused on determining which protected classes may have been disproportionately impacted by housing discrimination based on the number of complaints, while acknowledging that many individuals may be reluctant to step forward with a fair housing complaint for fear of retaliation or similar repercussion. A similar review was performed on data collected and provided by the North Carolina Human Relations Commission and the Fair Housing Project of Legal Aid of North Carolina.

Fair Housing Survey

HUD recommends that surveys be conducted during the AI process to gain input for the public regarding perceived impediments to fair housing choice in an area. As such, the State elected to utilize a survey instrument as a means to encourage public input in the AI process. This step was a cost-effective and efficient method to utilize research resources.

The survey targeted individuals involved in the housing arena, although anyone was allowed to complete the survey. In addition to gathering data, this survey was utilized to help promote public involvement throughout the AI process. The 2015 State of North Carolina Fair Housing Survey, an internet-based instrument, received 526 responses.

The survey was designed to address a wide variety of issues related to fair housing and affirmatively furthering fair housing. If limited input on a particular topic was received, it was assumed that the entirety of stakeholders did not view the issue as one of high pervasiveness or impact. This does not mean that the issue was nonexistent in the state, but rather that there was no widespread perception of its prevalence, as gauged by survey participants. The following narrative summarizes key survey themes and data that were addressed in the survey instrument.

Federal, State, and Local Fair Housing Laws

The first section of the survey asked respondents to address a number of questions related to fair housing laws, including assessment of their familiarity with and understanding of these laws, knowledge of classes of persons protected by these laws, the process for filing fair housing complaints, and an inquiry into whether or not fair housing laws should be changed.

Fair Housing Activities

The second section of the survey evaluated stakeholders' awareness of and participation in fair housing activities in the state, including outreach activities such as trainings and seminars, as well as monitoring and enforcement activities such as fair housing testing exercises.

Barriers to Fair Housing Choice in the Private Sector

This section addressed fair housing in the State of North Carolina's private housing sector and offered a series of two-part questions. The first part asked respondents to indicate awareness of questionable practices or barriers to fair housing choice in a variety of private sector industries, and the second part requested a narrative description of these questionable practices or concerns if an affirmative response was received. The specific areas of the private sector that respondents were asked to examine included the:

- Rental housing market,
- Real estate industry,
- Mortgage and home lending industries,
- Housing construction or accessible housing design fields,
- Home insurance industry,
- Home appraisal industry, and
- Any other housing services.

The use of open-ended questions allowed respondents to address any number of concerns such as redlining, neighborhood issues, lease provisions, steering, substandard rental housing, occupancy rules, and other fair housing issues in the private housing sector of the state.

Fair Housing in the Public Sector

Just as in the section of the survey concerning private sector barriers, respondents were asked to offer insight into their awareness of questionable practices or barriers to fair housing in the public sector. A list of areas within the public sector was provided, and respondents were asked first to specify their awareness of fair housing issues within each area. If they were aware of any fair housing issues, they were asked to further describe these issues in a narrative fashion. Respondents were asked to identify fair housing issues within the following public sector areas related to housing:

- Land use policies,
- Zoning laws,
- Occupancy standards or health and safety codes,
- Property tax policies,
- Permitting processes,
- Housing construction standards,
- Neighborhood or community development policies, and
- Any other public administrative actions or regulations.

The questions in this section were used to identify fair housing issues in the state regarding zoning, building codes, accessibility compliance, subdivision regulations, displacement issues, development practices, residency requirements, property tax policies, land use policies, and NIMBYism.⁸

Additional Questions

Finally, respondents were asked about their awareness of any local fair housing plans or specific geographic areas of the State with fair housing problems. Respondents were also asked to leave additional comments.

⁸ "Not In My Backyard" mentality

Research Conclusions

The final list of impediments to fair housing choice in non-entitlement areas of the State of North Carolina was drawn from all quantitative, qualitative, and public input sources, and was based on HUD's definition of an impediment to fair housing choice as any action, omission, or decision that affects housing choice because of protected class status. The determination of qualification as an impediment was derived from the frequency and severity of occurrences drawn from quantitative and qualitative data evaluation and findings.

PUBLIC INVOLVEMENT

This section discusses analysis of fair housing in the State of North Carolina as gathered from various public involvement efforts conducted as part of the AI process. Public involvement feedback is a valuable source of qualitative data about impediments, but, as with any data source, citizen comments alone do not necessarily indicate the existence of state-wide impediments to fair housing choice. However, survey and forum comments that support findings from other parts of the analysis reinforce findings concerning impediments to fair housing choice.

SECTION II. SOCIO-ECONOMIC CONTEXT

This section presents demographic, economic, and housing information collected from the Census Bureau, the Bureau of Economic Analysis, the Bureau of Labor Statistics, and other sources. Data were used to analyze a broad range of socio-economic characteristics, including population growth, race, ethnicity, disability, employment, poverty, and housing trends. Many of these data are also available by Census tract, and are shown in geographic maps. Ultimately, the information presented in this section illustrates the underlying conditions that shape housing market behavior and housing choice in non-entitlement areas of North Carolina.

To supplement 2000 and 2010 Census data, data for this analysis was also gathered from the Census Bureau's American Community Survey (ACS). The ACS data cover similar topics to the decennial counts but include data not appearing in the 2010 Census, such as household income and poverty. The key difference of these datasets is that ACS data represent a five-year average of annual data estimates as opposed to a point-in-time 100 percent count. The ACS data reported in this report, which span the years from 2009 through 2013, are not directly comparable to decennial Census counts because they do not account for certain population groups such as the homeless and because they are based on samples rather than counts of the population. However, *percentage* distributions from the ACS data can be compared to distributions from the 2000 and 2010 Censuses.

DEMOGRAPHICS

As part of the essential review of the background context of the markets which housing choices are made in non-entitlement areas of North Carolina, detailed population and demographic data are included to describe the residents of these areas. These data summarize the characteristics of the total population for the entire state's non-entitlement areas, as well as the outcome of housing location choices. These data help to address whether over-concentrations of racial and ethnic minorities exist, and if so, which areas of the state are most affected. Concentrations of protected class populations do not necessarily indicate the existence impediments to fair housing choice, but may represent the results of impediments identified in other data.

POPULATION DYNAMICS

Table II.1 at right presents population counts in non-entitlement areas of the State of North Carolina, as drawn from the 2000 and 2010 Censuses, intercensal estimates for 2001 through 2009, and postcensal estimates from 2011 through 2013. As shown, the population of the state's non-entitlement areas has increased by 16.5 percent since 2000. Data from the intercensal and postcensal estimates suggest that yearly population growth slowed considerably around 2008, from around 71,000 per year on average to an average of approximately 39,000 per year.

Table II.1
Intercensal Population
Estimates

Non-Entitlement Areas of
North Carolina
2000, 2010 Census and
Intercensal Estimates

Year	Estimate
Census 2000	4,857,316
July 2001 Est.	4,875,620
July 2002 Est.	4,938,727
July 2003 Est.	4,986,512
July 2004 Est.	5,054,371
July 2005 Est.	5,132,430
July 2006 Est.	5,234,796
July 2007 Est.	5,332,247
July 2008 Est.	5,425,102
July 2009 Est.	5,488,828
Census 2010	5,530,459
July 2011 Est.	5,568,311
July 2012 Est.	5,595,120
July 2013 Est.	5,626,088
July 2014 Est.	5,657,171
Change 00 – 14	16.5%

POPULATION BY AGE

The population of the state's non-entitlement areas grew by 13.9 percent between 2000 and 2010, or by roughly 673,000. As shown in Table II.2 below, much of that growth is attributable to a pronounced increase in the number of residents aged 55 to 64, along with those aged 65 and over. Each of these cohorts grew at a rate that was well above the overall average, and together they accounted for more than half of the overall population growth. All other cohorts grew at comparatively slow rates with the exception of residents aged 25 to 34, which declined by 5.5 percent over the decade: these cohorts all represented smaller shares of the non-entitlement population in 2010 than they had in 2000. However, residents aged 35 to 54 still represented the largest share of the population, at 28.6 percent.

Table II.2
Population by Age
Non-Entitlement Areas of North Carolina
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
Under 5	314,957	6.5%	343,713	6.2%	9.1%
5 to 19	996,630	20.5%	1,102,309	19.9%	10.6%
20 to 24	289,100	6.0%	320,332	5.8%	10.8%
25 to 34	667,536	13.7%	631,019	11.4%	-5.5%
35 to 54	1,456,471	30.0%	1,582,850	28.6%	8.7%
55 to 64	488,580	10.1%	730,454	13.2%	49.5%
65 or Older	644,042	13.3%	819,782	14.8%	27.3%
Total	4,857,316	100.0%	5,530,459	100.0%	13.9%

The rapid growth observed in the elderly cohort; i.e., among residents aged 65 and older; was attributable in large part to above-average growth in the number of residents at the younger and older ends of the elderly population. As shown in Table II.3 below, residents aged 65 and 66 increased in number by 43 percent, and the number of residents aged 67 to 69 grew by 39.5 percent. Meanwhile, the number of residents aged 85 or older grew by 35.8 percent and the number of residents aged 80 to 84 grew by 27.3 percent.

Table II.3
Elderly Population by Age
Non-Entitlement Areas of North Carolina
2000 & 2010 Census SF1 Data

Age	2000 Census		2010 Census		% Change 00-10
	Population	% of Total	Population	% of Total	
65 to 66	81,196	12.6%	116,141	14.2%	43.0%
67 to 69	112,124	17.4%	156,413	19.1%	39.5%
70 to 74	168,319	26.1%	201,258	24.6%	19.6%
75 to 79	132,426	20.6%	149,370	18.2%	12.8%
80 to 84	83,518	13.0%	106,320	13.0%	27.3%
85 or Older	66,459	10.3%	90,280	11.0%	35.8%
Total	644,042	100.0%	819,782	100.0%	27.3%

POPULATION BY RACE AND ETHNICITY

A majority of residents in the state's non-entitlement areas in 2000 were white, as shown in Table II.4 on the following page. However, the share of white residents declined by two percentage points over the following decade, to 75.3 percent in 2010. Black residents accounted for the second-largest share of the non-entitlement population in both years, though

that share also declined, from 17.3 to 16.3 percent. By contrast, residents who identified their race as “other” more than doubled in number, and nearly doubled as a share of the population. The same was true of the Hispanic population, which grew from 3.8 to 6.9 percent of the total population.

Table II.4
Population by Race and Ethnicity
 Non-Entitlement Areas of North Carolina
 2000 & 2010 Census SF1 Data

Race	2000 Census		2010 Census		% Change 00–10
	Population	% of Total	Population	% of Total	
White	3,755,612	77.3%	4,165,989	75.3%	10.9%
Black	840,869	17.3%	904,045	16.3%	7.5%
American Indian	84,630	1.7%	99,586	1.8%	17.7%
Asian	31,645	0.7%	52,758	1.0%	66.7%
Native Hawaiian/ Pacific Islander	1,676	0.0%	2,793	0.1%	66.6%
Other	95,197	2.0%	206,068	3.7%	116.5%
Two or More Races	47,687	1.0%	99,220	1.8%	108.1%
Total	4,857,316	100.0%	5,530,459	100.0%	13.9%
Non-Hispanic	4,670,866	96.2%	5,146,167	93.1%	10.2%
Hispanic	186,450	3.8%	384,292	6.9%	106.1%

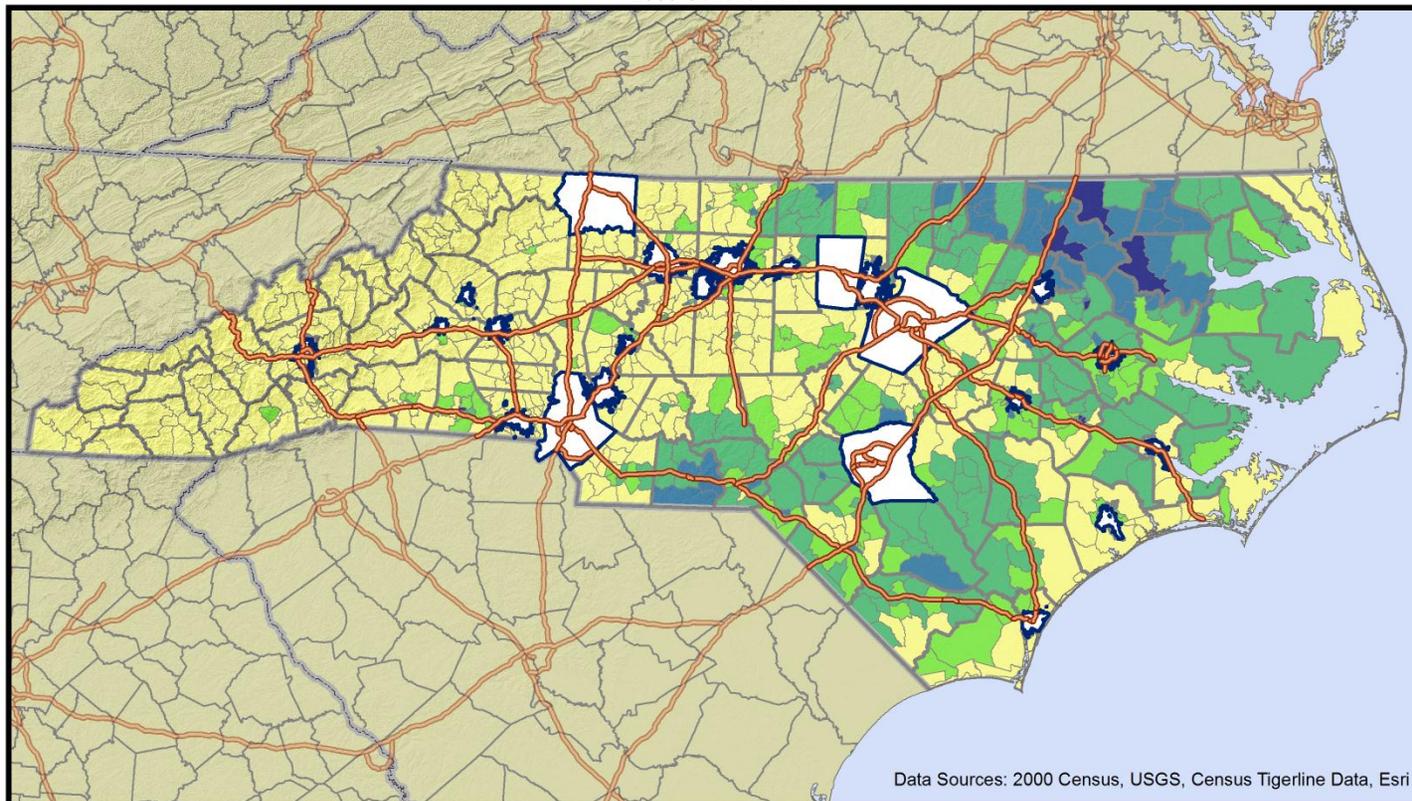
The geographic distribution of racial and ethnic minorities can vary significantly throughout a community. For the purposes of this study, a group is considered to be disproportionately concentrated in a Census tract if that group represents a share of the tract population that exceeds the group’s share of the total non-entitlement population by ten percentage points. For example, black residents accounted for 17.3 percent of the total non-entitlement population in 2000: therefore, any Census tract in which black residents made up more than 27.3 percent of the population is considered to have a disproportionate share of black residents.

There were many Census tracts outside of the state’s entitlement jurisdictions with disproportionate shares of black residents; as shown in Map II.1 on the following page, these Census tracts tended to be located in the eastern part of the state in 2000. In some cases, black residents represented more than three-quarters of the Census tract population, as in large rural tracts near the Virginia border and near Kinston and Tarboro. Black residents tended to represent relatively small shares of the population in Western North Carolina, with the exception of Census tracts around Shelby and in Rutherford County. The overall distribution of black residents in non-entitlement areas of the state was similar in 2010, as shown in Map II.2 on page 27.

As noted above, the Hispanic population grew markedly as a share of the state’s non-entitlement population: from 3.8 percent in 2000 to 6.9 percent by 2010. As the Hispanic population grew, Hispanic residents tended to become more and more concentrated in central, inland Census tracts. As shown in Map II.3 on page 28, more than a third of the population in and around Siler City was Hispanic in that year, and relatively high concentrations of Hispanic residents were observed in rural tracts to the east and west of Cumberland County.

In 2010, the highest concentrations of Hispanic residents appeared in many of the same Census tracts, as shown in Map II.4 on page 29. However, by that time Hispanic residents had come to account for as much as half of the population in Census tracts around Siler City and Sanford, as well as in large rural tracts to the south of Goldsboro.

Map II.1
Black Population by Census Tract
 Non-Entitlement Areas of North Carolina
 2000 Census Data



Data Sources: 2000 Census, USGS, Census Tigerline Data, Esri

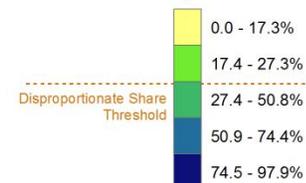
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2000 Black Population

2000 Percent black population in non-entitlement areas of North Carolina = 17.3%
 Disproportionate share threshold* = 27.3%

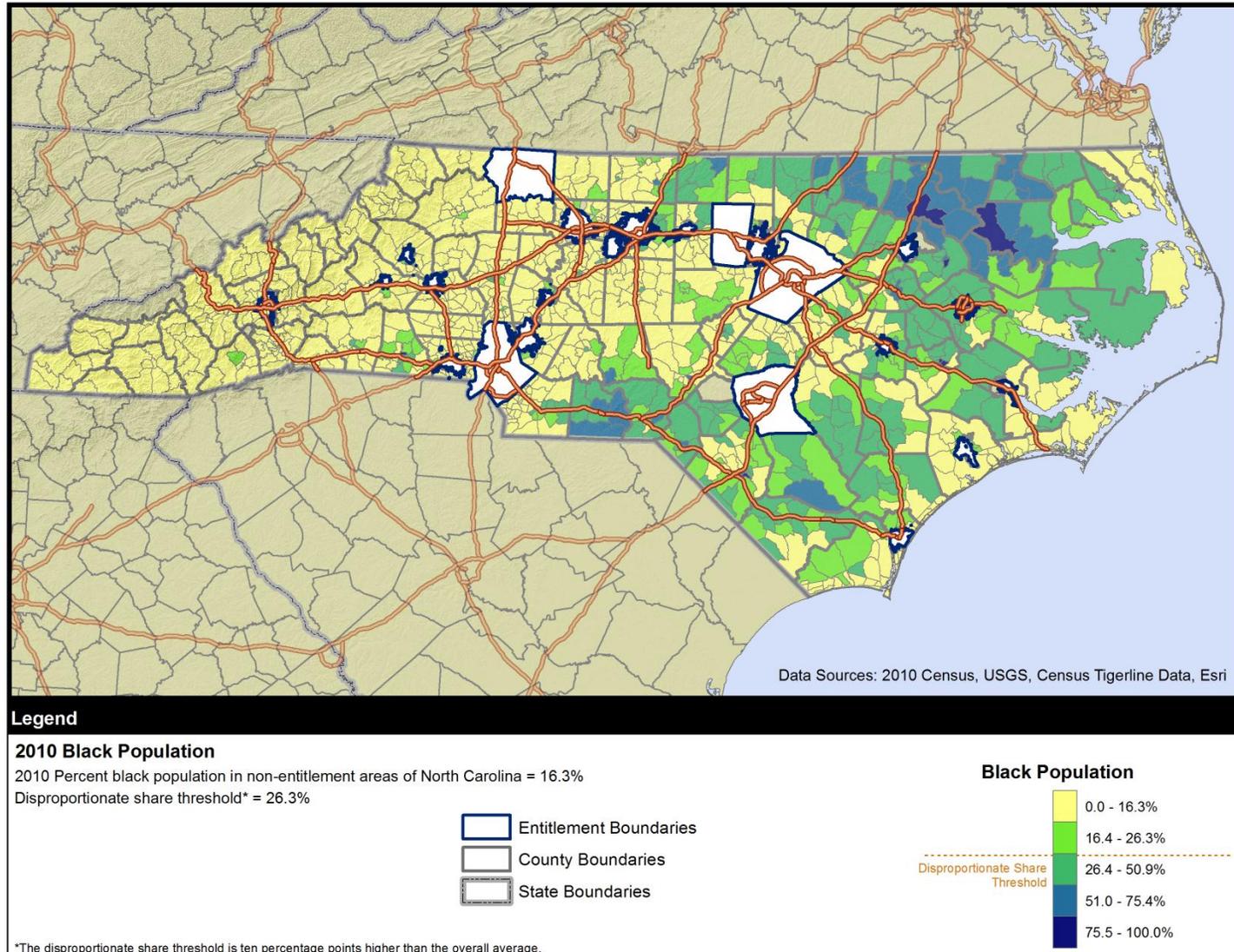
-  Entitlement Boundaries
-  County Boundaries
-  State Boundaries

Black Population

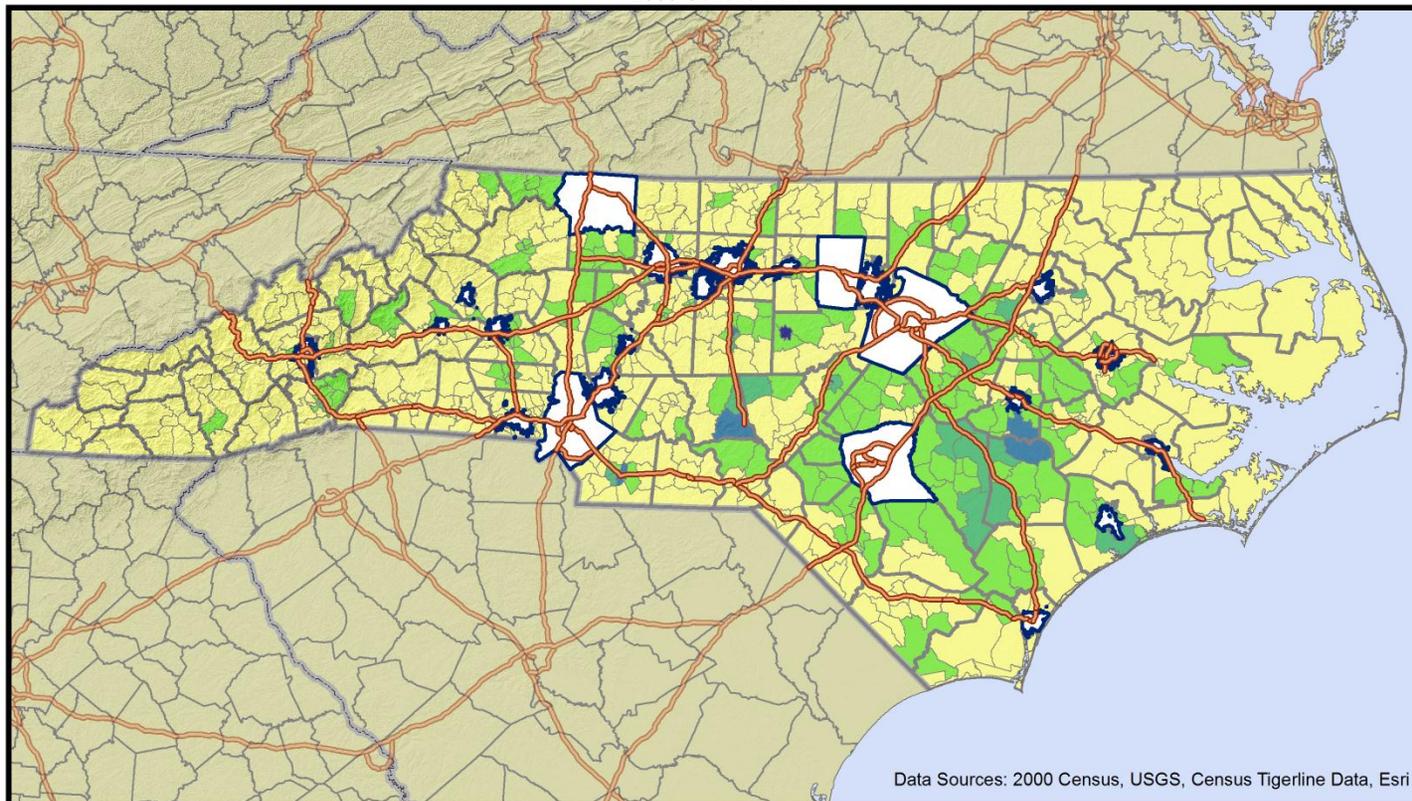


*The disproportionate share threshold is ten percentage points higher than the overall average.

Map II.2
Black Population by Census Tract
 Non-Entitlement Areas of North Carolina
 2010 Census Data



Map II.3
Hispanic Population by Census Tract
 Non-Entitlement Areas of North Carolina
 2000 Census Data



Data Sources: 2000 Census, USGS, Census Tigerline Data, Esri

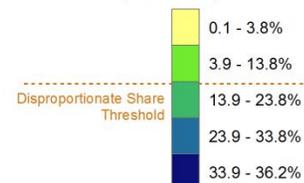
Legend

2000 Hispanic Population

2000 Percent Hispanic population in non-entitlement areas of North Carolina = 3.8%
 Disproportionate share threshold* = 13.8%

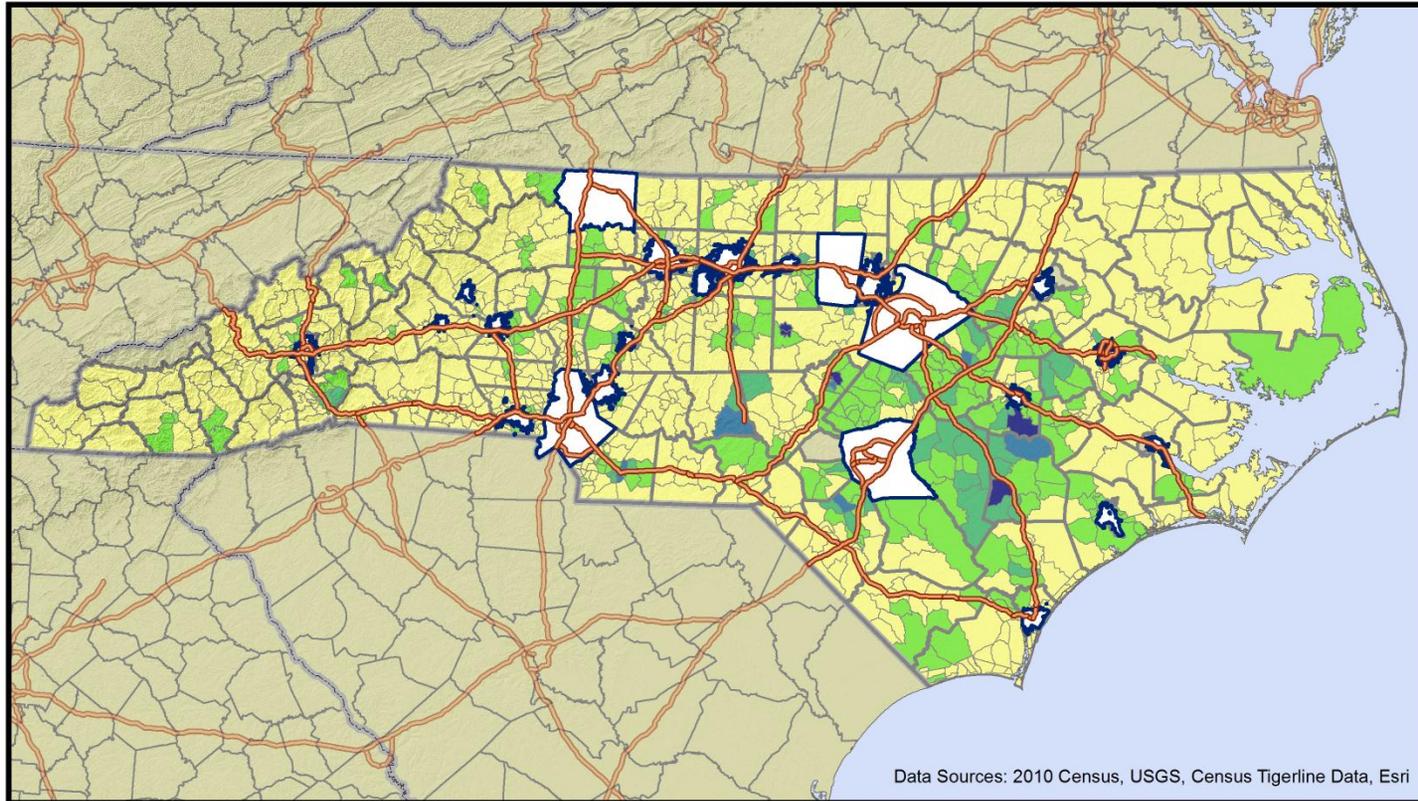
-  Entitlement Boundaries
-  County Boundaries
-  State Boundaries

Hispanic Population



*The disproportionate share threshold is ten percentage points higher than the overall average.

Map II.4
Percent Hispanic Population by Census Tract
 Non-Entitlement Areas of North Carolina
 2010 Census Data



Data Sources: 2010 Census, USGS, Census Tigerline Data, Esri

Legend

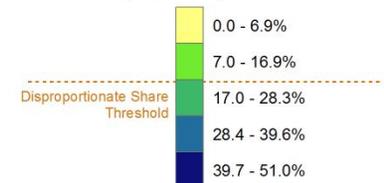
2010 Hispanic Population

2010 Percent Hispanic population in non-entitlement areas of North Carolina = 6.9%

Disproportionate share threshold* = 16.9%

-  Entitlement Boundaries
-  County Boundaries
-  State Boundaries

Hispanic Population



*The disproportionate share threshold is ten percentage points higher than the overall average.

DISABILITY STATUS

Residents with disabilities accounted for more than a fifth of the state's non-entitlement population in 2000, as shown in Table II.5 at right. In 2009-2013, residents with disabilities accounted for 15.5 percent of the population, as shown in Table II.6 below. In both years, the incidence of disabilities increased considerably with age. In considering these figures, it is important to note that the definition of "disability" employed in the 2009-2013 American Community Survey was substantively different from the definition included in the 2000 Census. For that reason, the Census Bureau discourages direct comparisons between the two. For example, it would not be appropriate to conclude that the share of residents with disabilities declined by 7.4 percentage points.

Table II.5
Disability by Age
Non-Entitlement Areas of North Carolina
2000 Census SF3 Data

Age	Total	
	Disabled Population	Disability Rate
5 to 15	46,602	6.3%
16 to 64	686,373	22.2%
65 and older	287,191	46.4%
Total	1,020,166	22.9%

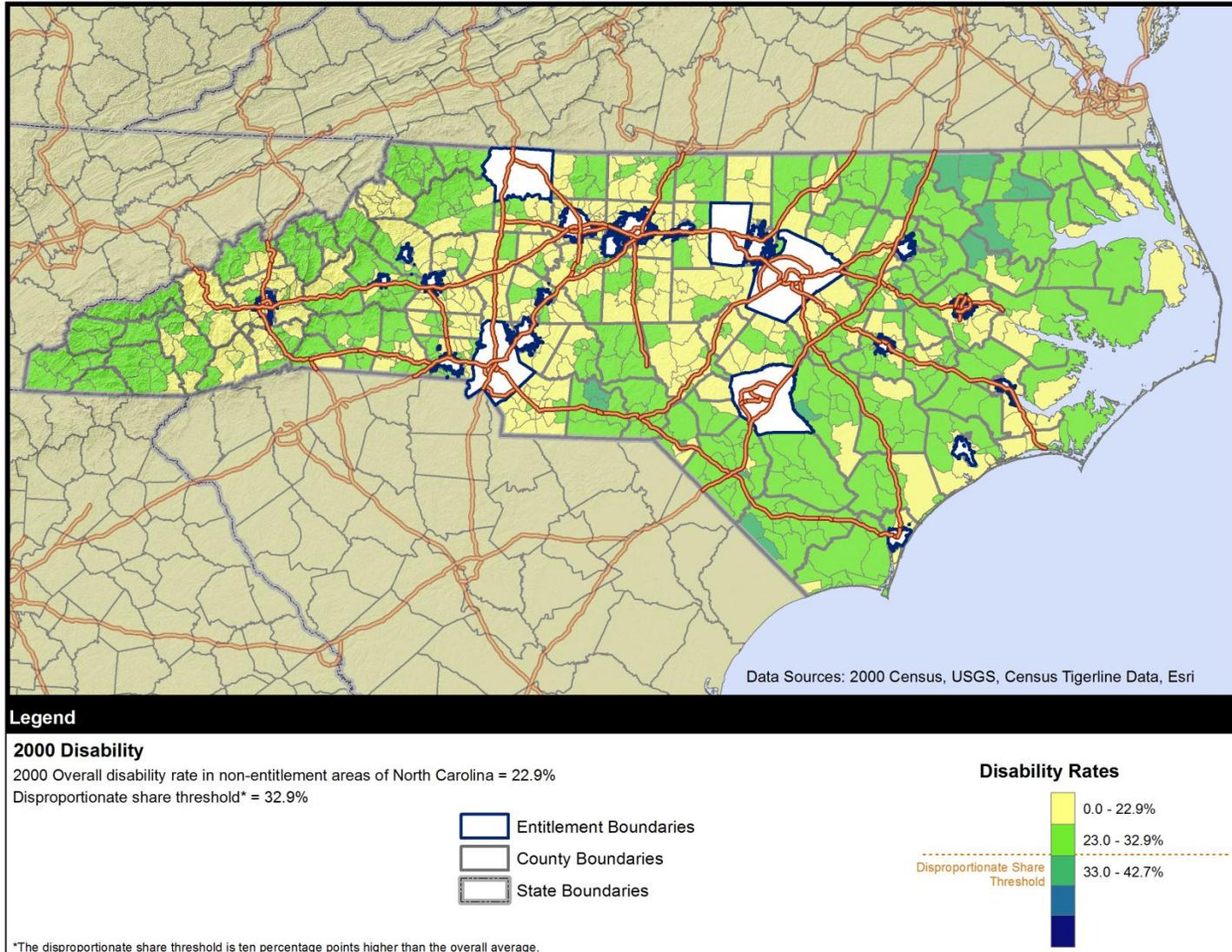
Table II.6
Disability by Age
Non-Entitlement Areas of North Carolina
2013 Five-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	1,635	1.0%	1,359	0.8%	2,994	0.9%
5 to 17	37,328	7.6%	23,287	5.0%	60,615	6.4%
18 to 34	43,386	8.3%	34,834	6.5%	78,220	7.4%
35 to 64	183,488	16.7%	189,795	16.2%	373,283	16.5%
65 to 74	70,732	30.3%	73,201	27.8%	143,933	29.0%
75 or Older	71,007	52.1%	112,973	55.4%	183,980	54.1%
Total	407,576	15.4%	435,449	15.5%	843,025	15.5%

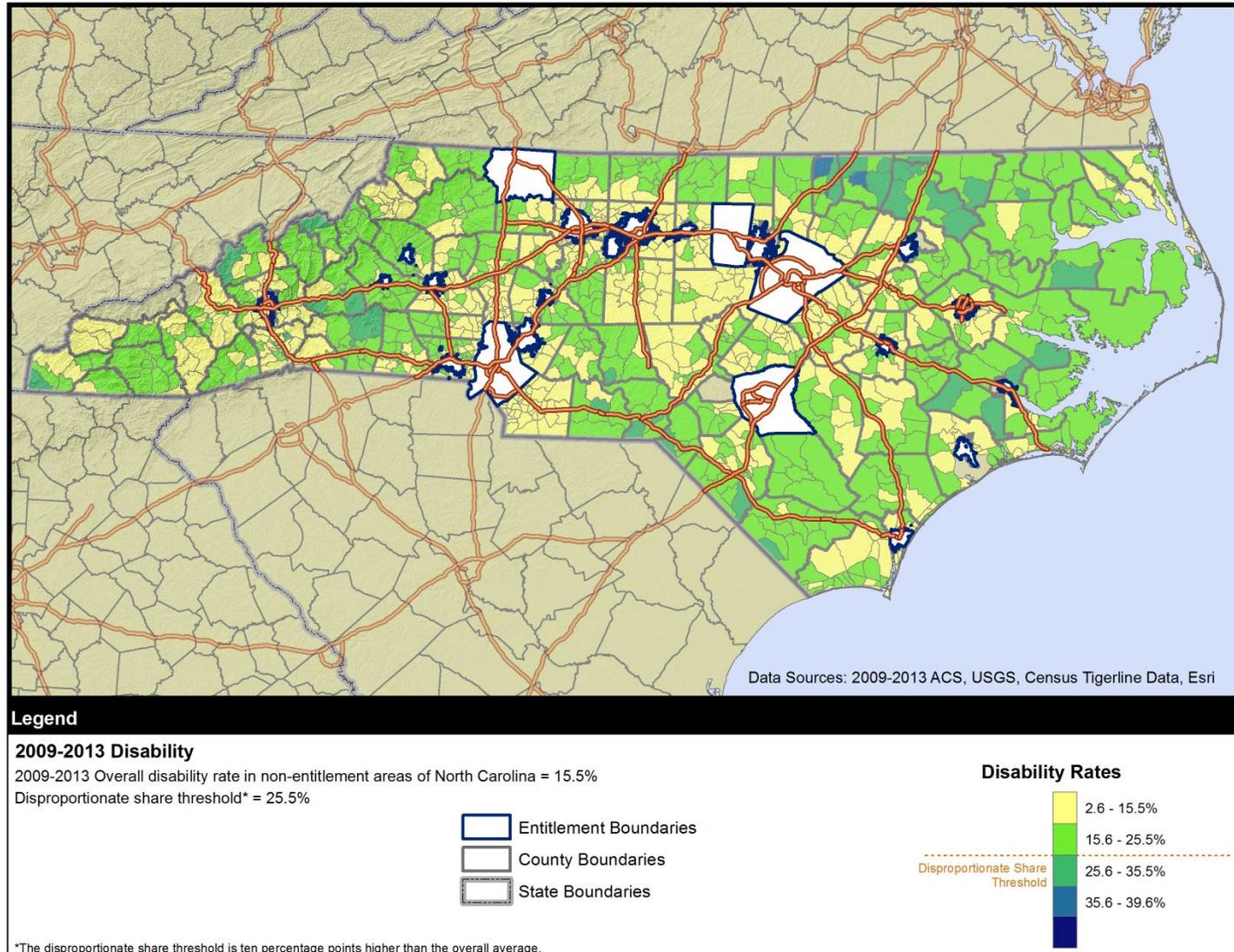
Non-entitlement residents with disabilities tended to account for larger shares of the population in Census tracts in the northeast of the state in 2000, as shown in Map II.5 on the following page. High concentrations were observed along the Interstate 95 corridor, near the border with Virginia, where 33 percent of residents or more were living with disabilities. Similar proportions were observed near the border with South Carolina, to the east of Interstate 95.

As noted above, the overall disability rate in the state's non-entitlement areas was considerably lower in 2009-2013 than it had been in 2000, owing in large part to a change in the Census Bureau's definition of "disability". However, the overall patterns observed in 2000 still obtained in 2009-2013, as shown in Map II.6 on page 32. Residents with disabilities tended to account for relatively small shares of the population in Census tracts that were closer to the state's entitlement areas, and higher shares of rural Census tracts, particularly near the state's northern border along Interstate 85.

Map II.5
Population with Disabilities by Census Tract, 2000
 Non-Entitlement Areas of North Carolina
 2000 Census Data



Map II.6
Population with Disabilities by Census Tract, 2009-2013
 Non-Entitlement Areas of North Carolina
 2009-2013 Census Data



ECONOMICS

Data indicating the size and dynamics of job markets in the non-entitlement areas of North Carolina, workforce, incomes, and persons in poverty provide essential contextual background and indicate the potential buying power of state residents when making a housing choice.

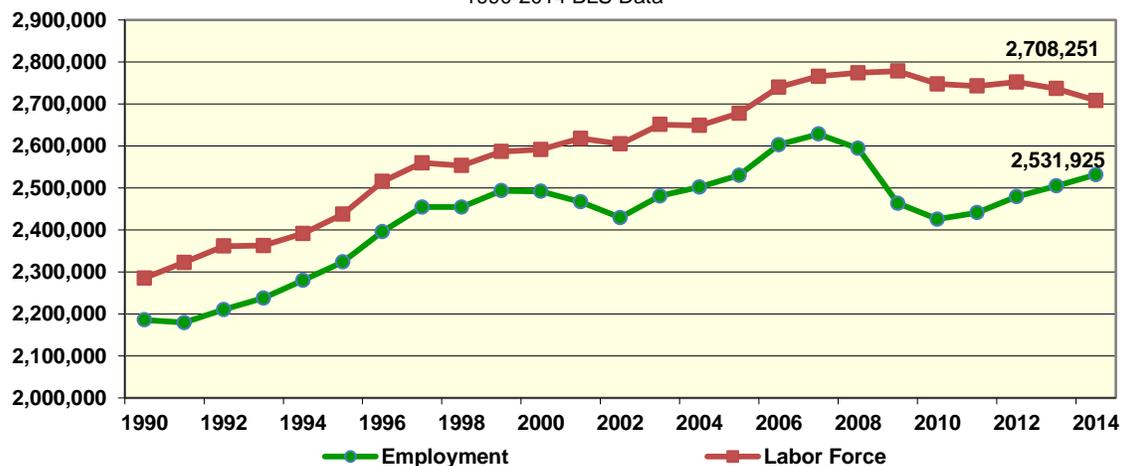
LABOR FORCE AND EMPLOYMENT

The Bureau of Labor Statistics collects data on labor force participation and employment, and represents a count of people either working or seeking work. These data are collected through the Current Employment Statistics program, which surveys about 144,000 businesses and government agencies each month. The unemployment rate is based on the gap between the number of employed persons and the total number in the labor force; this gap is represented as a percentage of the total labor force.

Growth in the state's non-entitlement labor force has been uneven, but generally positive, since 1990, as shown in Diagram II.1 below. New workers were added to the labor force in 14 out of the 17 years between 1990 and 2007, by which time the size of the labor force stood at around 2.77 million workers. However, growth in the labor force began to stall in that year, and the number of workers who were employed or looking for work in the state's non-entitlement areas fell after 2009, and has continued to fall since then.

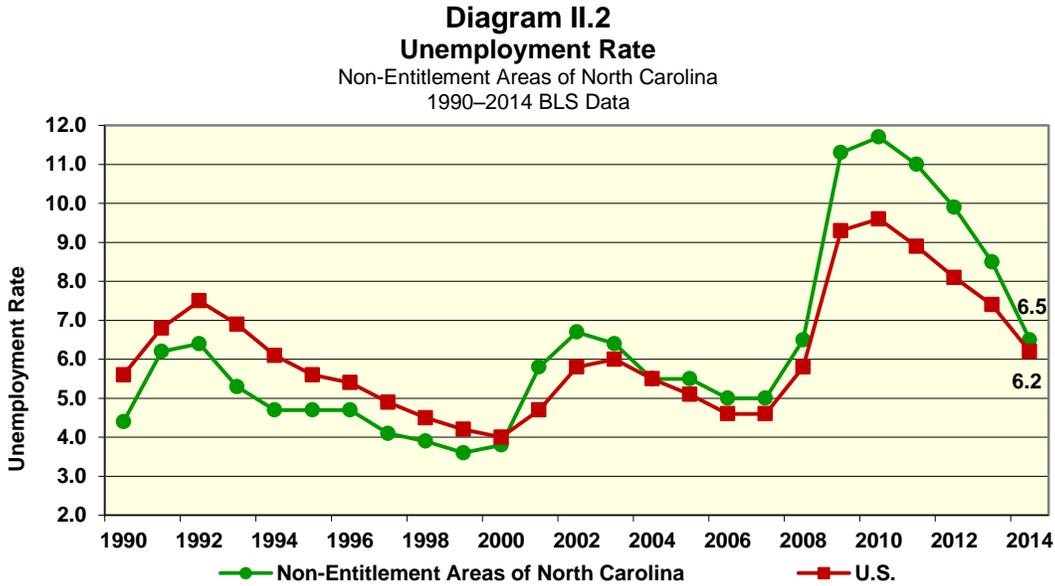
Like growth in the labor force, growth in the number of employed workers has generally been positive since 1990, but that growth has been punctuated by several periods of marked decline, notably after 2000 and again after 2007. This second period of decline, which coincided with the recent worldwide recession, was by far the more severe: the number of employed persons fell by over 202,000 in the space of three years. Since 2010, growth in the number of employed has been steady, and that number stood at 2,531,925 in 2014.

Diagram II.1
Employment and Labor Force
Non-Entitlement Areas of North Carolina
1990-2014 BLS Data

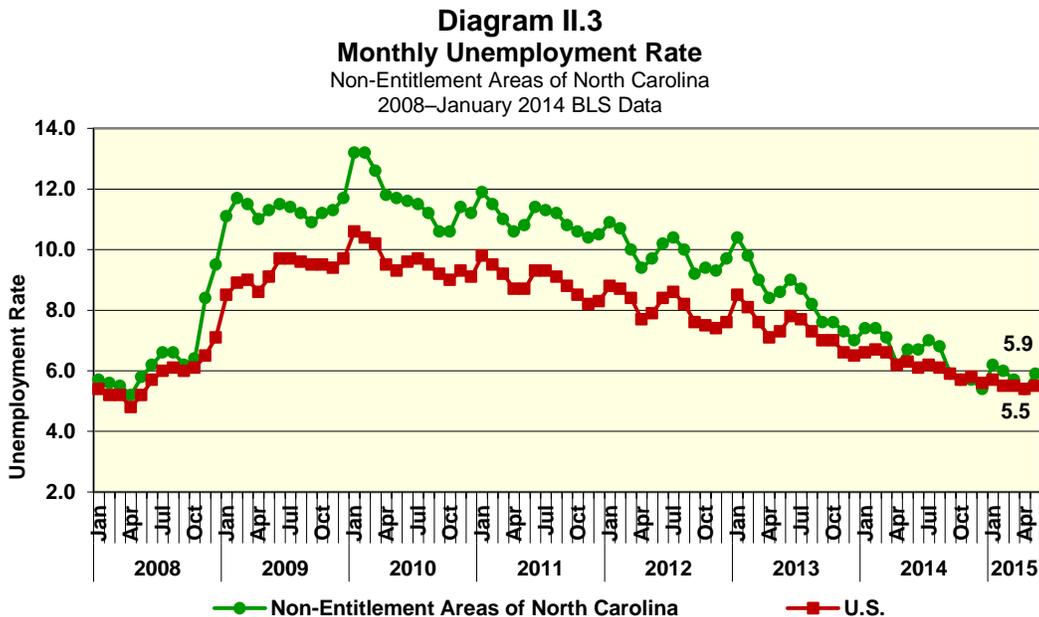


As the number of employed persons in the state fell after 2000 and again after 2007, the labor force remained relatively stable. The result, as shown in Diagram II.2 on the following page, was a spike in the unemployment rate in 2000-2002, followed by a considerably more

dramatic spike in 2007-2010. At its height, the unemployment rate stood at 11.7 percent in the state’s non-entitlement areas, well above the national unemployment rate of 9.6 percent. However, with a steady decline in the labor force since 2010, accompanied by steady growth in the number of employed, the unemployment rate has fallen rapidly over the last four years. By 2014, unemployed job-seekers represented 6.5 percent of the labor force, roughly on par with national figures.



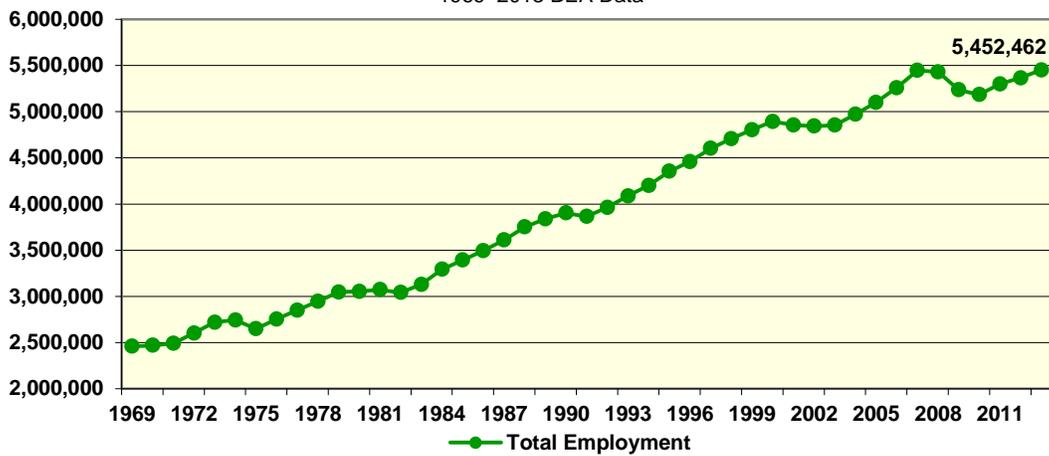
Monthly unemployment figures from 2008 through May of 2015, presented in Diagram II.3 below, indicate that the peak in the unemployment rate came in January and February of 2010, when 13.2 percent of the labor force was unable to find work. The unemployment rate has fallen steadily since that time, in spite of marked seasonal spikes in the winter and summer months of most years.



FULL- AND PART-TIME EMPLOYMENT AND EARNINGS

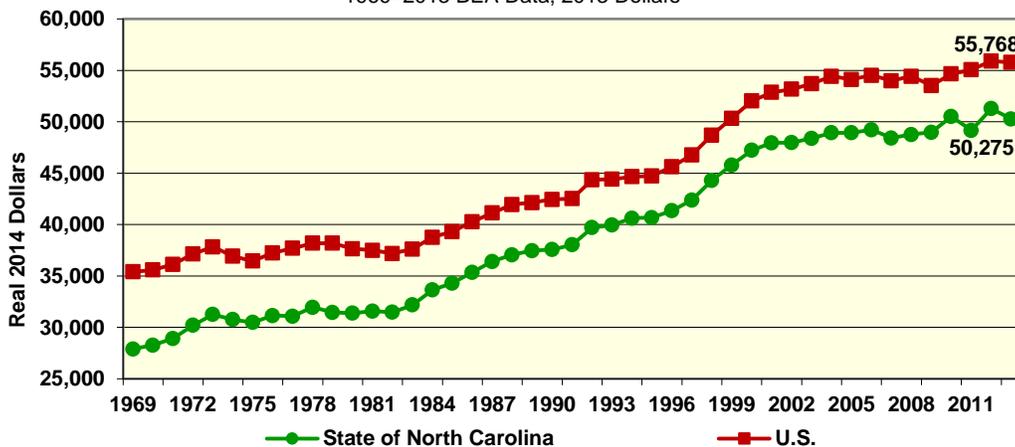
Total employment, as measured by the Bureau of Economic Analysis, refers to the total number of part-time and full-time jobs in the state as a whole. As shown in Diagram II.4 below, total employment figures largely reflect the overall positive growth in the labor market since 1990 described previously, and indicate that this growth is a continuation of a generally positive growth trend stretching back to the early- to mid-1970s. These figures also highlight the impact of the recent recession, as the number of full- or part-time jobs in the state fell by nearly 261,000 between 2007 and 2010. Since 2010, the number of full- and part-time jobs in the state has grown by more than 267,000, and stood at 5,452,462 in that year.

Diagram II.4
Full- and Part-Time Employment
 State of North Carolina
 1969–2013 BEA Data

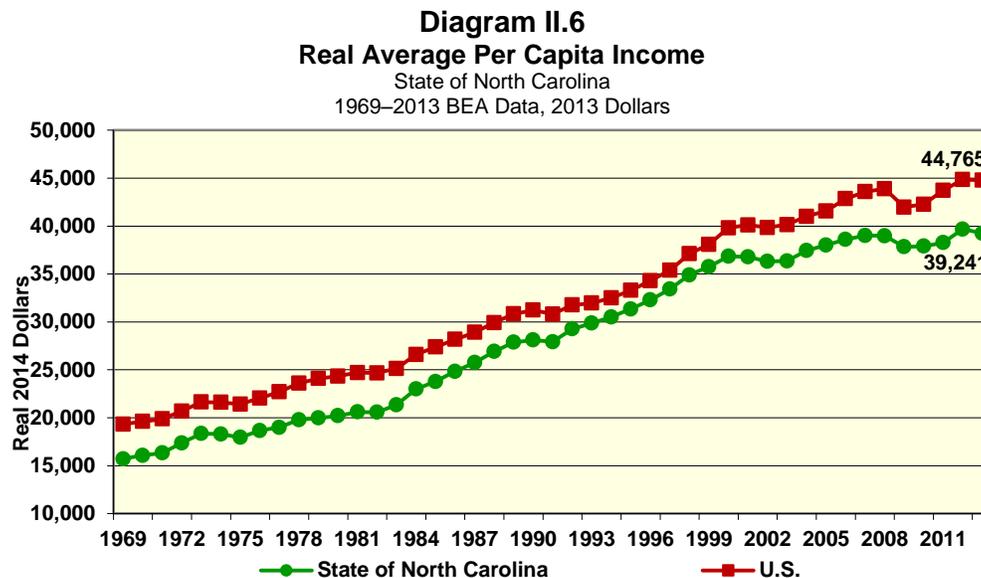


Growth in real average earnings per job was strong between 1990 and 2000, as shown in Diagram II.5 below. However, that growth began to slow considerably around 2000, and the amount that the average worker earned at his or her job, adjusted for inflation, changed relatively little over the next eight years. However, the period since 2009 has seen marked fluctuation in average inflation-adjusted earnings.

Diagram II.5
Real Average Earnings Per Job
 State of North Carolina
 1969–2013 BEA Data, 2013 Dollars



Changes in real per capita income (“real PCI”), though generally less pronounced than trends in average inflation-adjusted earnings, have largely followed the same pattern since the early 1970s. As shown in Diagram II.6 below, growth in the average state resident’s inflation-adjusted income, generally strong and steady through the 1980s and 1990s, stalled after 2000. Incomes experienced a modest decline over the next three years, before resuming a relatively steady level of yearly growth. However, real PCI in the state fell again after 2007, and in this case the decline was more pronounced: by 2010, the income of the average state resident was over \$1,100 less, in real dollars, than it had been in 2007. However, by 2013 real PCI had risen to \$39,241.



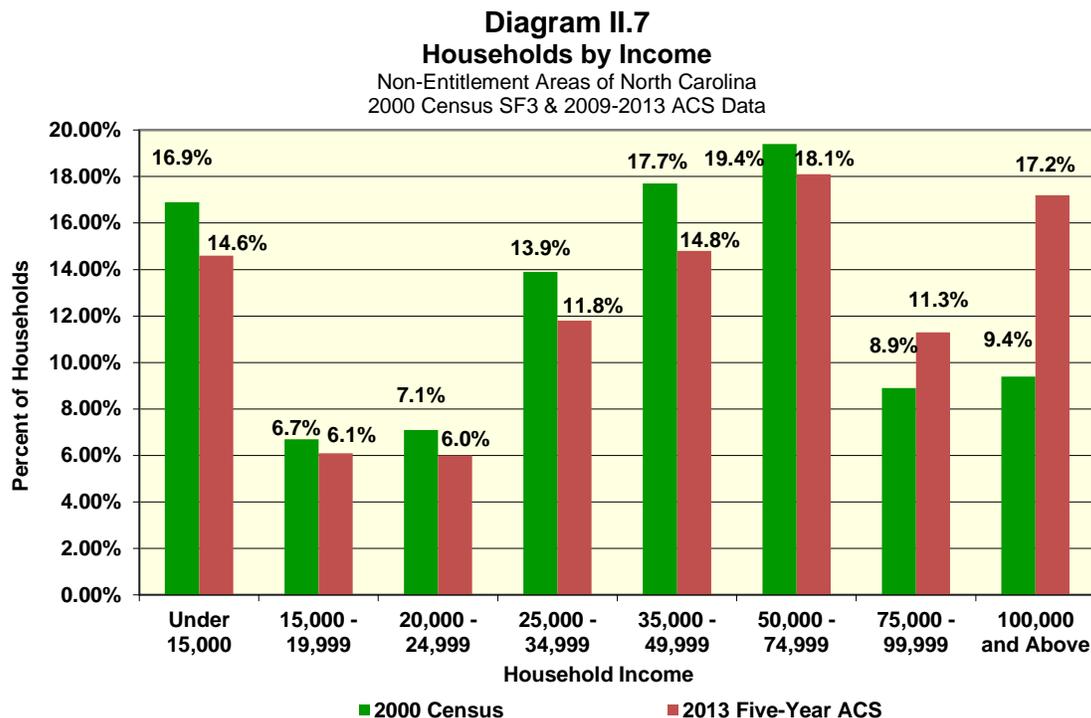
HOUSEHOLD INCOME

During the period from 2000 through 2009-2013, household incomes in the state’s non-entitlement areas shifted upward. As shown in Table II.7 below, households in income brackets below \$75,000 per year accounted for smaller percentages of total households in 2009-2013 than they had in 2000. By contrast, households earning \$75,000 to \$99,999 grew as a share of all non-entitlement households, from 8.1 to 11.5 percent. Similarly, the share of households with incomes of \$100,000 or more doubled after 2000, from 7.0 percent to 14.2 percent of all households.

Table II.7
Households by Income
 Non-Entitlement Areas of North Carolina
 2000 Census SF3 & 2013 Five-Year ACS Data

Income	2000 Census		2013 Five-Year ACS	
	Households	% of Total	Households	% of Total
Less than \$15,000	343,183	18.2%	331,319	15.6%
\$15,000 to \$19,999	134,568	7.1%	139,308	6.5%
\$20,000 to \$24,999	140,684	7.5%	134,287	6.3%
\$25,000 to \$34,999	270,268	14.3%	259,992	12.2%
\$35,000 to \$49,999	344,397	18.3%	323,730	15.2%
\$50,000 to \$74,999	367,984	19.5%	392,847	18.5%
\$75,000 to \$99,999	152,628	8.1%	245,212	11.5%
\$100,000 or More	131,115	7.0%	302,433	14.2%
Total	1,884,827	100.0%	2,129,128	100.0%

The shift toward higher incomes among households in the state’s non-entitlement areas is presented in Diagram II.7 below.



POVERTY

The Census Bureau uses a set of income thresholds that vary by family size and composition to determine poverty status. If a family’s total income is less than the threshold for its size, then that family, and every individual in it, is considered poor. The poverty thresholds do not vary geographically, but they are updated annually for inflation using the Consumer Price Index. The official poverty definition counts income before taxes and does not include capital gains and non-cash benefits such as public housing, Medicaid, and food stamps.

In spite of the upward shift in income described above, the poverty rate in the state’s non-entitlement areas rose from 12.5 to 17.7 percent over the same time period. As shown in Table II.8 below, the poverty rate among residents aged 18 to 54 rose by over four percentage points: by 2009-2013, around 56.6 percent of the population in that age group was living in poverty. By contrast, the incidence of poverty among elderly residents fell by over five percentage points.

Table II.8
Poverty by Age
Non-Entitlement Areas of North Carolina
2000 Census SF3 & 2013 Five-Year ACS Data

Age	2000 Census		2013 Five-Year ACS	
	Persons in Poverty	% of Total	Persons in Poverty	% of Total
Under 6	68,595	11.6%	123,863	12.8%
6 to 17	126,455	21.3%	207,096	21.4%
18 to 64	310,020	52.3%	547,085	56.6%
65 or Older	87,421	14.8%	88,010	9.1%
Total	592,491	100.0%	966,054	100.0%
Poverty Rate	12.5%	.	17.7%	.

Poverty was not spread evenly throughout the State, as some Census tracts had much higher rates of poverty than others. As shown in Map II.7 on the following page, poverty rates in 2000 tended to be lower in Census tracts that were closer to major cities and entitlement areas, and to be higher in more sparsely populated rural Census tracts. This was particularly true of inland Census tracts along the coastal plains, as well as in tracts bordering Tennessee, where poverty rates ranged from 22.6 to 35.5 percent. However, the highest poverty rates in 2000 were observed in Census tracts in small communities in the east of the state, where more than 40 percent of residents were living in poverty. Such communities included Elizabeth City, Kinston, and Wilson in the east of the state, Lexington in the center, and Lumberton in the south.

As the poverty rate throughout the state's non-entitlement areas increased after 2000, more and more communities were coming to experience disproportionate levels of poverty. The poverty rate ranged as high as 81.4 percent in some non-entitlement Census tracts, and the number of tracts in which more than half of the population was living in poverty grew considerably. As shown in Map II.8 on page 40, poverty rates tended to be relatively high in Census tracts in the east of the state. As was the case in 2000, the highest poverty rates in 2009-2013 were observed in Census tracts in and around Kinston and Wilson, where poverty rates exceeded 63.6 percent. Poverty rates also approached those levels in Boone in the west of the state.

HOUSING

Simple counts of housing by age, type, tenure, and other characteristics form the basis for the housing stock background, suggesting the available housing in non-entitlement areas of the state from which residents have to choose. Examination of households, on the other hand, shows how residents use the available housing, and shows household size and housing problems such as incomplete plumbing and/or kitchen facilities. Review of housing costs reveals the markets in which housing consumers in the state can shop.

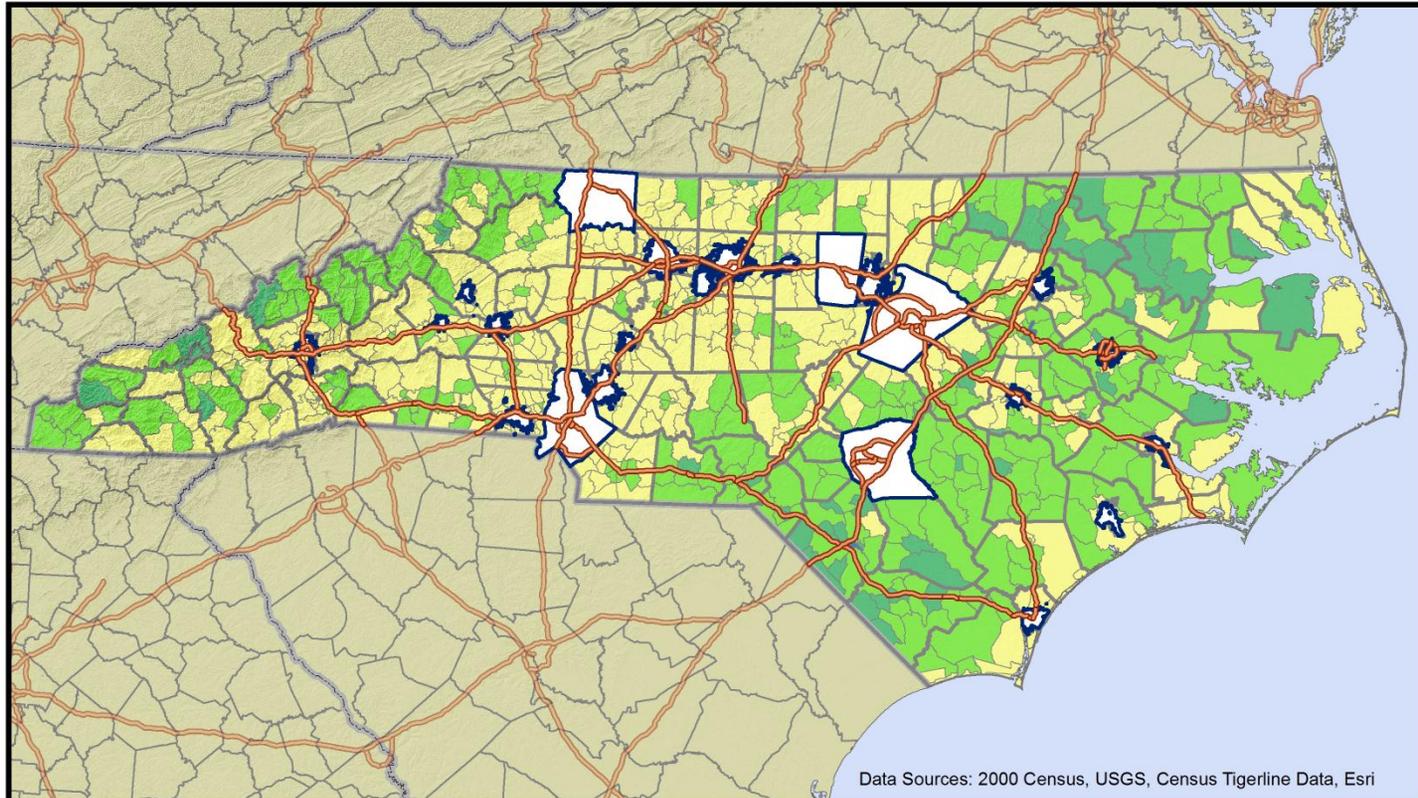
CHARACTERISTICS OF THE HOUSING STOCK

Between 2000 and 2010, the housing stock grew by 18.7 percent in the state's non-entitlement areas, outpacing growth in the number of households. As shown in Table II.9 below, the result was a moderate increase in the number of vacant housing units, which grew from 13.4 to 16.2 percent of the housing stock. Among occupied housing units, there was a marked shift toward rental units, as owner-occupied units fell from 76.2 to 73.1 percent of all owner-occupied units and the percentage of renter-occupied units increased by 3.1 percentage points.

Table II.9
Housing Units by Tenure
Non-Entitlement Areas of North Carolina
2000 & 2010 Census SF1 Data

Tenure	2000 Census		2010 Census		% Change 00-10
	Units	% of Total	Units	% of Total	
Occupied Housing Units	1,883,983	86.6%	2,163,790	83.8%	14.9%
Owner-Occupied	1,435,842	76.2%	1,580,733	73.1%	10.1%
Renter-Occupied	448,141	23.8%	583,057	26.9%	30.1%
Vacant Housing Units	291,055	13.4%	417,772	16.2%	43.5%
Total Housing Units	2,175,038	100.0%	2,581,562	100.0%	18.7%

Map II.7
Poverty Rate by Census Tract, 2000
 Non-Entitlement Areas of North Carolina
 2000 Census Data



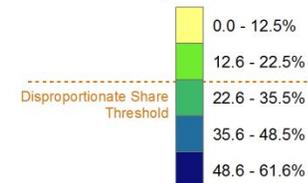
Legend

2000 Poverty

2000 Overall poverty rate in non-entitlement areas of North Carolina = 12.5%
 Disproportionate share threshold* = 22.5%

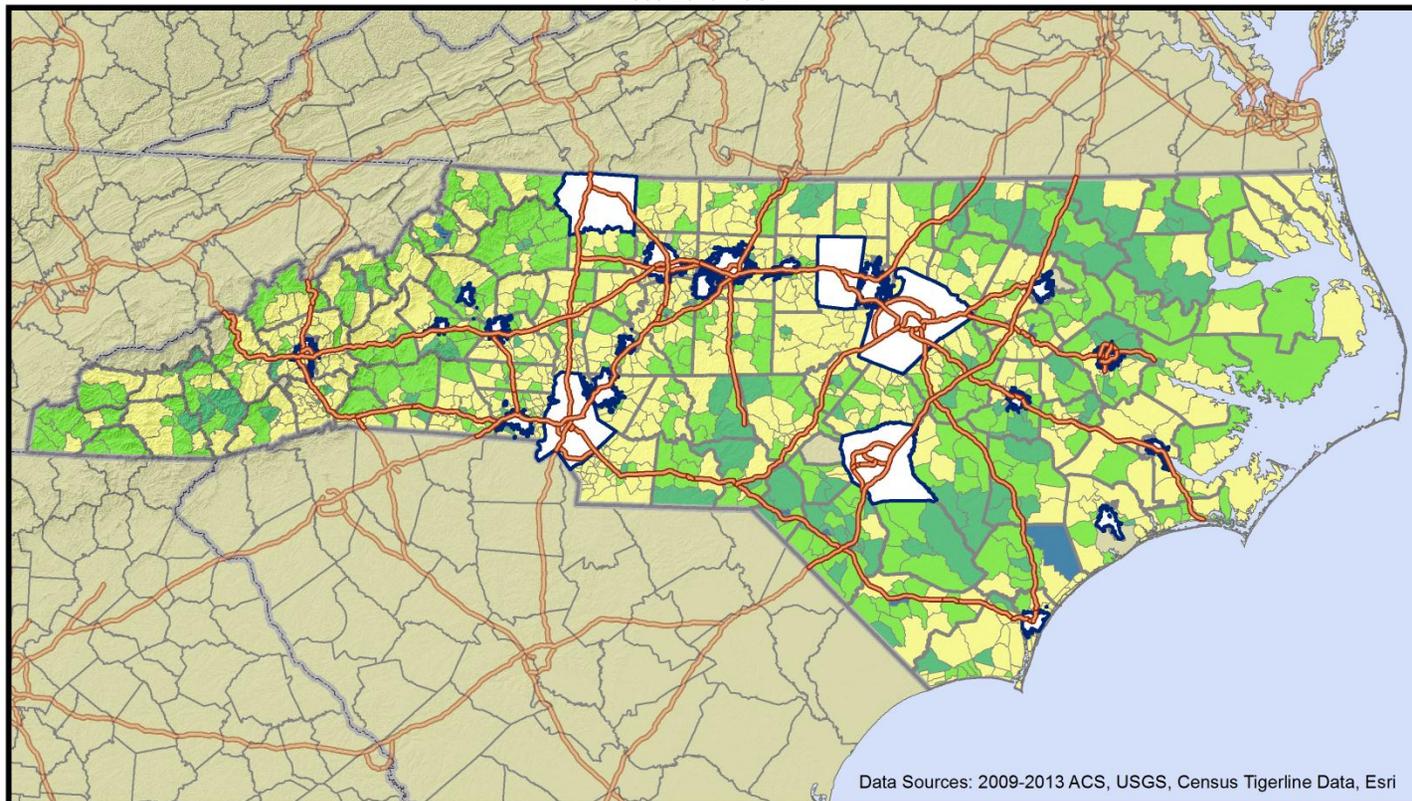
-  Entitlement Boundaries
-  County Boundaries
-  State Boundaries

Poverty Rates



*The disproportionate share threshold is ten percentage points higher than the overall average.

Map II.8
Poverty Rate by Census Tract, 2009-2013
 Non-Entitlement Areas of North Carolina
 2009-2013 ACS Data



Data Sources: 2009-2013 ACS, USGS, Census Tigerline Data, Esri

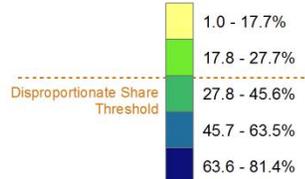
Legend

2009-2013 Poverty

2009-2013 Overall poverty rate in non-entitlement areas of North Carolina = 17.7%
 Disproportionate share threshold* = 27.7%

-  Entitlement Boundaries
-  County Boundaries
-  State Boundaries

Poverty Rates



*The disproportionate share threshold is ten percentage points higher than the overall average.

As shown in Map II.9 on the following page, housing units were more likely to be occupied by their owners in central and western Census tracts, as well as in coastal Census tracts. Anywhere from 83.2 to 100 percent of housing units were owner-occupied in Census tracts surrounding Charlotte, Winston-Salem, and Greensboro. By contrast, Census tracts with relatively high shares of rental housing appeared throughout the state in 2010, as shown in Map II.10 on page 43. However, these tracts were more common in the inner coastal plain.

VACANT HOUSING

The composition of the vacant housing stock also changed, as the share of units that were rented or sold but not occupied fell by over three percentage points. Meanwhile, as shown in Table II.10 below, the share of units that were available for rent grew from 16 to 18.6 percent, and the share of units available for sale grew from 9 to 10 percent of the vacant housing stock. The share of vacant units that were classified as “other vacant” also grew, by 0.7 percentage points. “Other vacant” units tend to be more problematic than other types of vacant housing: because they are not available to the market place, they may fall into dilapidation and contribute to a blighting influence where they are grouped in close geographic proximity.

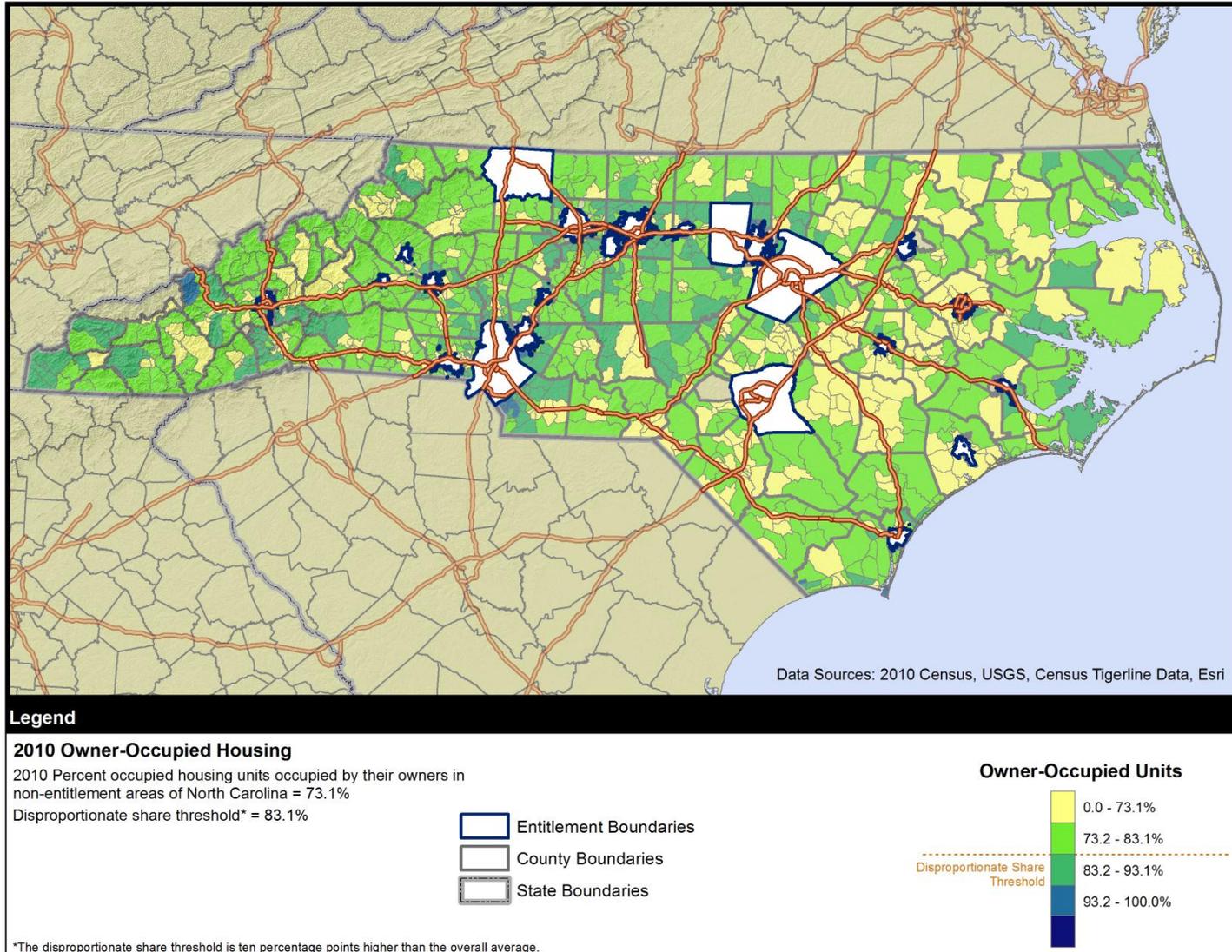
Table II.10
Disposition of Vacant Housing Units
Non-Entitlement Areas of North Carolina
2000 & 2010 Census SF1 Data

Disposition	2000 Census		2010 Census		% Change 00–10
	Units	% of Total	Units	% of Total	
For Rent	46,690	16.0%	77,561	18.6%	66.12%
For Sale	26,116	9.0%	41,972	10.0%	60.71%
Rented or Sold, Not Occupied	18,713	6.4%	13,465	3.2%	-28.04%
For Seasonal, Recreational, or Occasional Use	128,580	44.2%	180,962	43.3%	40.74%
For Migrant Workers	1,702	0.6%	1,502	0.4%	-11.75%
Other Vacant	69,254	23.8%	102,310	24.5%	47.73%
Total	291,055	100.0%	417,772	100.0%	43.5%

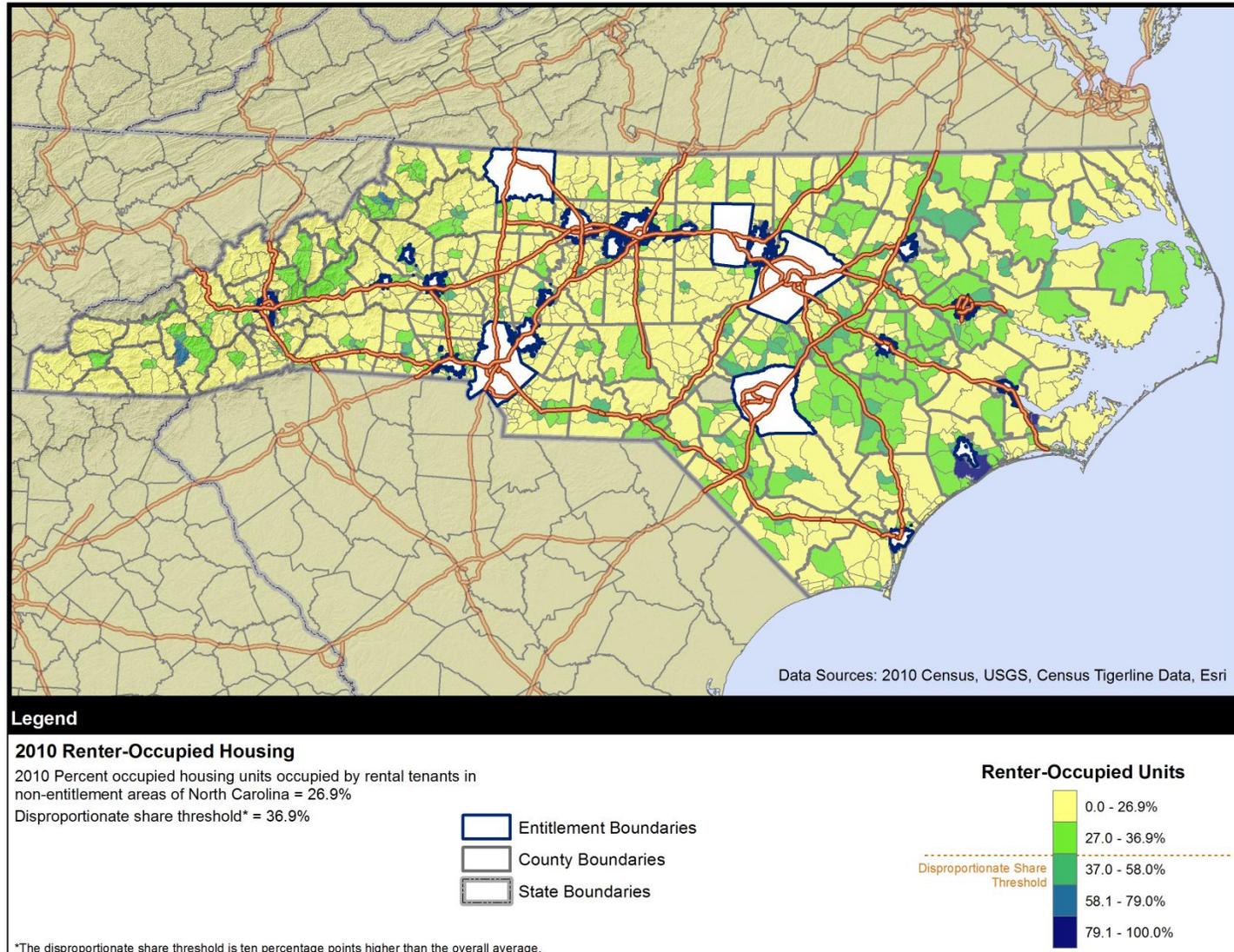
The highest vacancy rates in the state’s non-entitlement areas appeared in Census tracts along the border with Tennessee in the west and the state’s barrier islands in the east, as shown in Map II.11 on page 44. Central Census tracts tended to have relatively low vacancy rates, though there were a couple of clusters of central Census tracts, between Interstate 85 and 95 on the Virginia border and near Gilead in the south, in which vacancy rates were relatively high.

However, units classified as “other vacant” tended to account for relatively small shares of vacant units in Census tracts with high overall vacancy rates. As shown in Map II.12 on page 45, tracts with high rates of “other vacant” units generally lay in the center of the state, and were relatively uncommon in extreme western and eastern Census tracts.

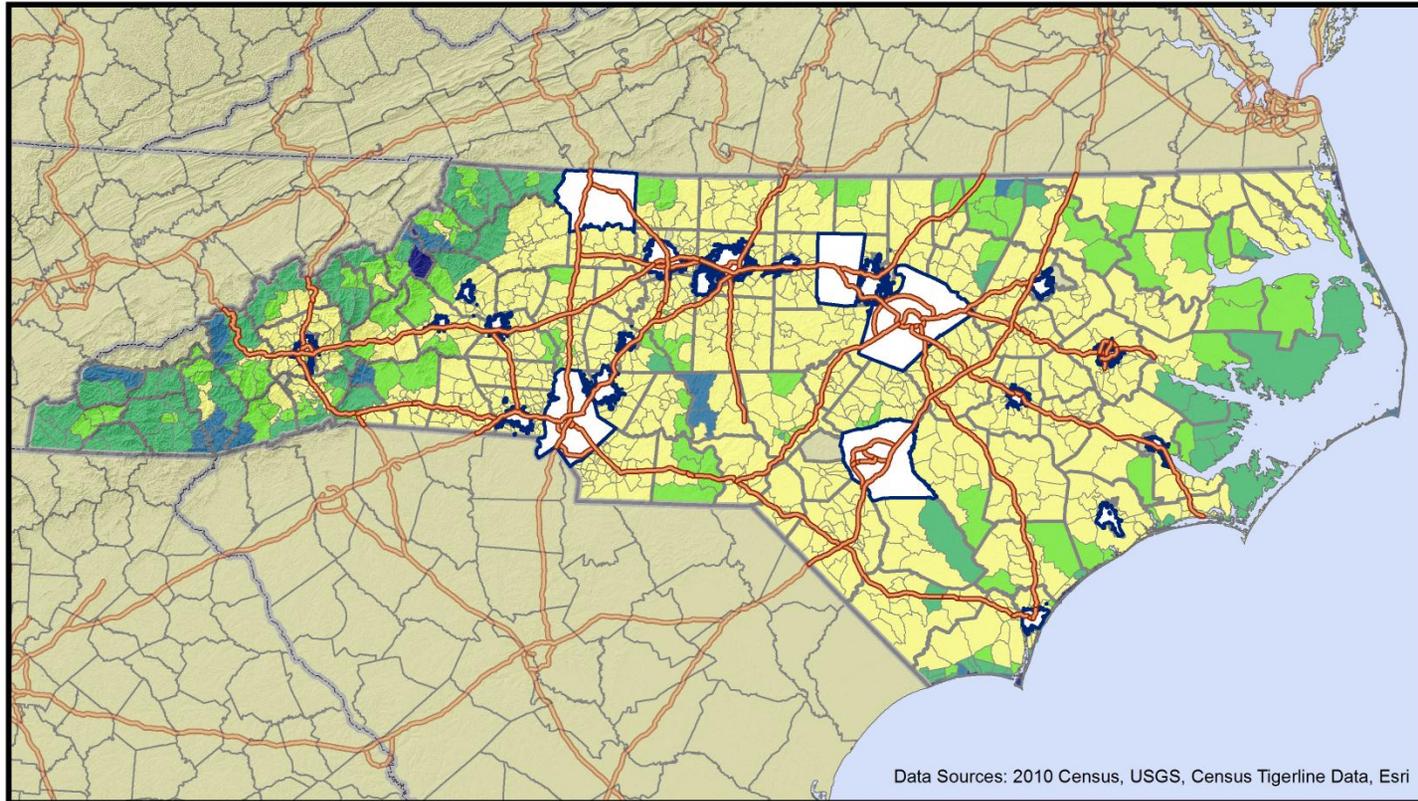
Map II.9
Owner-Occupied Housing Units, 2010
 Non-Entitlement Areas of North Carolina
 2010 Census Data



Map II.10
Renter-Occupied Housing Units, 2010
 Non-Entitlement Areas of North Carolina
 2010 Census Data



Map II.11
Vacant Housing Units, 2010
 Non-Entitlement Areas of North Carolina
 2010 Census Data



Data Sources: 2010 Census, USGS, Census Tigerline Data, Esri

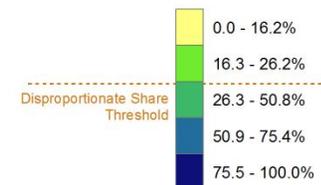
Legend

2010 Vacancy Rates

2010 Overall vacancy rate in non-entitlement areas of North Carolina = 16.2%
 Disproportionate share threshold* = 26.2%

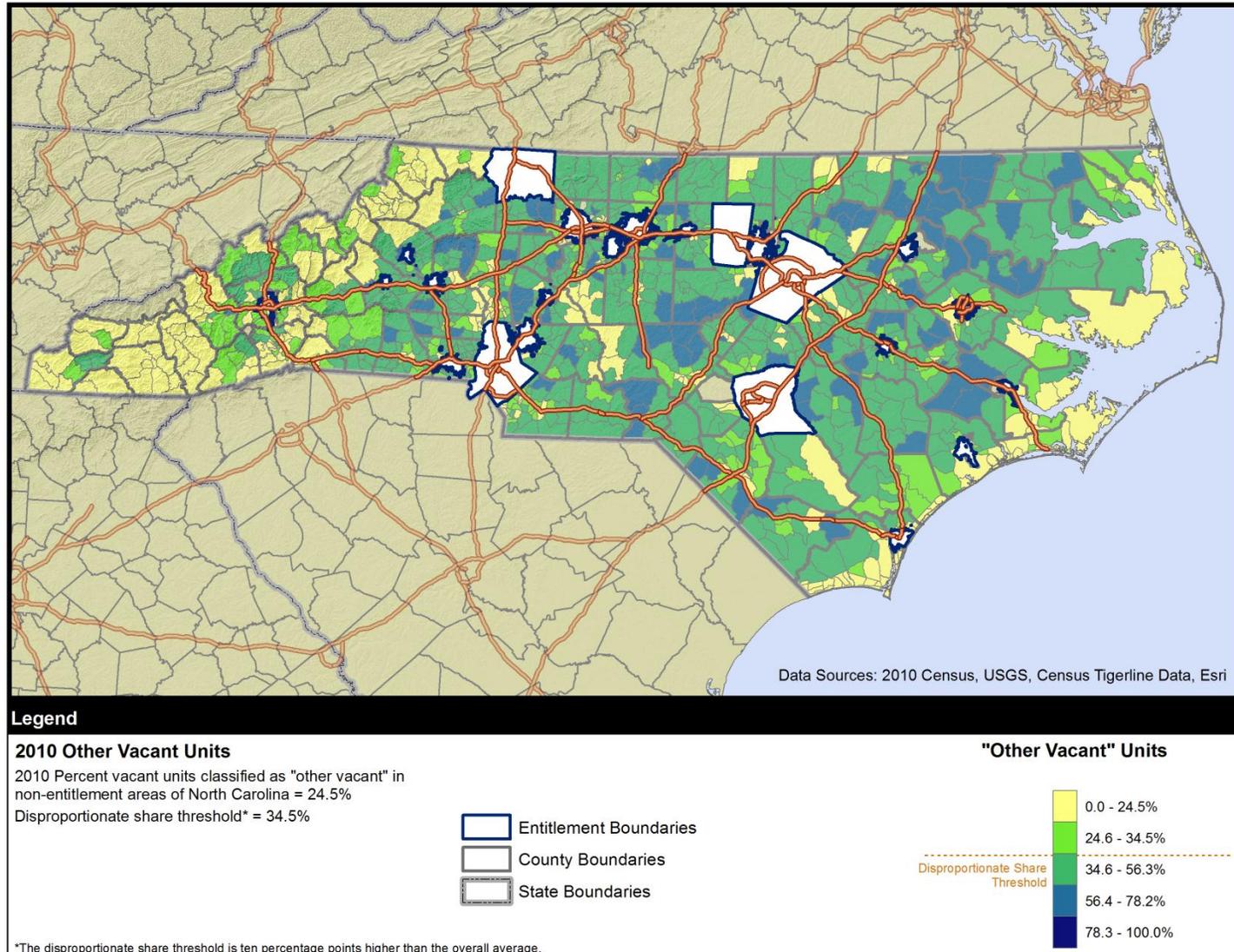
-  Entitlement Boundaries
-  County Boundaries
-  State Boundaries

Vacant Rates



*The disproportionate share threshold is ten percentage points higher than the overall average.

Map II.12
“Other Vacant” Housing Units, 2010
 Non-Entitlement Areas of North Carolina
 2010 Census Data



HOUSING UNITS BY TYPE

A large majority of housing units in the state's non-entitlement areas consisted of single-family units in 2000, as shown in Table II.11 below. The same was true in 2009-2013, by which time single-family units had grown as a share of the non-entitlement housing stock from 68.7 to 71.1 percent. Apartment units, which accounted for 3.6 percent of the housing stock in 2000, grew as a share of non-entitlement housing units by one percentage point. All other types of housing units either declined as a percentage of the housing stock, or retained the same shares in 2009-2013 as they had in 2000. Mobile homes, which constituted the second most common housing type, declined as a share of the overall housing stock by three percentage points.

Table II.11
Housing Units by Type
 Non-Entitlement Areas of North Carolina
 2000 Census SF3 & 2013 Five-Year ACS Data

Unit Type	2000 Census		2013 Five-Year ACS	
	Units	% of Total	Units	% of Total
Single-Family	1,494,217	68.7%	1,835,244	71.1%
Duplex	44,218	2.0%	49,595	1.9%
Tri- or Four-Plex	42,609	2.0%	51,488	2.0%
Apartment	79,194	3.6%	119,054	4.6%
Mobile Home	509,212	23.4%	525,989	20.4%
Boat, RV, Van, Etc.	5,393	0.2%	1,136	0.0%
Total	2,174,843	100.0%	2,582,506	100.0%

HOUSEHOLD SIZE

Small households, or those with one or two members, constituted a majority of households in 2000 and 2010. As shown in Table II.12 below, both one- and two-person households increased in number by over 100,000 between Census counts, each growing as a share of households overall. Households with five members or more also grew as a percentage of all households, though here the comparatively rapid proportional increase represented a relatively small growth in the number of households.⁹

Table II.12
Households by Household Size
 Non-Entitlement Areas of North Carolina
 2000 & 2010 Census SF1 Data

Size	2000 Census		2010 Census		% Change 00-10
	Households	% of Total	Households	% of Total	
One Person	441,268	23.4%	541,657	25.0%	22.8%
Two Persons	676,079	35.9%	778,533	36.0%	15.2%
Three Persons	349,545	18.6%	368,391	17.0%	5.4%
Four Persons	265,929	14.1%	283,295	13.1%	6.5%
Five Persons	100,698	5.3%	121,934	5.6%	21.1%
Six Persons	31,965	1.7%	44,216	2.0%	38.3%
Seven Persons or More	18,499	1.0%	25,764	1.2%	39.3%
Total	1,883,983	100.0%	2,163,790	100.0%	14.9%

⁹ For example, though the number of households with seven members or more increased by 39.3 percent, that increase represented an addition of only 7,265.

HOUSING PROBLEMS

The 2000 Census and 2009-2013 ACS also include data relating to several types of housing problems, including overcrowding, incomplete plumbing and kitchen facilities, and cost-burdening. Most of these problems became less severe after 2000; the exception was the cost-burdening, which affected a greater percentage of households in 2009-2013 than had been affected in 2000. These housing problems are discussed in greater detail below.

Housing units are considered to be “overcrowded” when they include more than one resident per room, but less than 1.5. Housing units with more than 1.5 residents per room are considered to be severely over-crowded. As shown in Table II.13 below, only three percent of housing units exhibited any degree of overcrowding in 2000, and that share had only fallen by 2009-2013. Renter-occupied units were more likely to be overcrowded than owner-occupied units: nevertheless, no more than 4.1 percent of renter-occupied units were overcrowded at any point during that time period.

Table II.13
Overcrowding and Severe Overcrowding
Non-Entitlement Areas of North Carolina
2000 Census SF3 & 2013 Five-Year ACS Data

Data Source	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	% of Total	Households	% of Total	Households	% of Total	
Owner							
2000 Census	1,407,940	98.1%	20,820	1.5%	6,869	0.5%	1,435,629
2013 Five-Year ACS	1,527,853	98.6%	17,375	1.1%	4,824	0.3%	1,550,052
Renter							
2000 Census	419,637	93.6%	18,349	4.1%	10,239	2.3%	448,225
2013 Five-Year ACS	552,507	95.4%	19,432	3.4%	7,137	1.2%	579,076
Total							
2000 Census	1,827,577	97.0%	39,169	2.1%	17,108	0.9%	1,883,854
2013 Five-Year ACS	2,080,360	97.7%	36,807	1.7%	11,961	0.6%	2,129,128

Less than one percent of households lived in housing units with incomplete plumbing facilities in 2000. As shown in Table II.14 below, that share had only declined by 2009-2013. Housing units are considered to have incomplete plumbing facilities if they lack piped hot and cold running water, a flush toilet, and a bathtub or shower.

Table II.14
Households with Incomplete Plumbing Facilities
Non-Entitlement Areas of North Carolina
2000 Census SF3 & 2013 Five-Year ACS Data

Households	2000 Census	2013 Five-Year ACS
With Complete Plumbing Facilities	1,870,467	2,119,998
Lacking Complete Plumbing Facilities	13,387	9,130
Total Households	1,883,854	2,129,128
Percent Lacking	0.7%	0.4%

Similarly, only 0.6 percent of housing units had incomplete kitchen facilities in 2009-2013, a slight increase over 2000, as shown in Table II.15 on the following page. Households are considered to have incomplete kitchen facilities if they live in housing units lacking a sink with piped hot and cold water, a range or cook top and oven, and a refrigerator.

Table II.15
Households with Incomplete Kitchen Facilities

Non-Entitlement Areas of North Carolina
 2000 Census SF3 & 2013 Five-Year ACS Data

Households	2000 Census	2013 Five-Year ACS
With Complete Kitchen Facilities	1,874,394	2,115,871
Lacking Complete Kitchen Facilities	9,460	13,257
Total Households	1,883,854	2,129,128
Percent Lacking	0.5%	0.6%

Finally, though relatively few households were impacted by overcrowding and fewer still were affected by incomplete plumbing or kitchen facilities, a relatively large percentage of households were cost-burdened. Households are considered cost-burdened when more than thirty percent of their monthly income goes toward housing costs, and severely cost-burdened when housing costs take up more than half of their combined monthly income.

As shown in Table II.16 below, around 13.8 percent of housing units in the state's non-entitlement areas were cost-burdened in 2000, and 9.4 percent were severely cost-burdened. By 2009-2013, the share of cost-burdened and severely cost-burdened units had grown to 16.9 and 13.5 percent, respectively. This problem fell particularly hard on renter-occupied households, 44 percent of which were cost-burdened to some degree in 2009-2013. A complete version of this table with data for all households is included in Appendix E.

Table II.16
Cost Burden and Severe Cost Burden by Tenure

Non-Entitlement Areas of North Carolina
 2000 Census & 2013 Five-Year ACS Data

Data Source	31%-50%		Above 50%		Total
	Households	% of Total	Households	% of Total	
Owner With a Mortgage					
2000 Census	104,149	16.70%	56,363	9.10%	622,423
2013 Five-Year ACS	187,873	19.70%	123,291	13.00%	951,399
Owner Without a Mortgage					
2000 Census	21,633	6.20%	13,631	3.90%	351,278
2013 Five-Year ACS	48,667	8.10%	33,201	5.50%	598,653
Renter					
2000 Census	68,539	15.80%	62,877	14.50%	434,988
2013 Five-Year ACS	123,495	21.30%	131,304	22.70%	579,076
Total					
2000 Census	194,321	13.80%	132,871	9.40%	1,408,689
2013 Five-Year ACS	360,035	16.90%	287,796	13.50%	2,129,128

Renters with a severe cost burden are at risk of homelessness. Cost-burdened renters who experience one financial setback often must choose between rent and food or rent and health care for their families. Similarly, homeowners with a mortgage who have just one unforeseen financial constraint, such as temporary illness, divorce, or the loss of employment, may face foreclosure or bankruptcy. Furthermore, households that no longer have a mortgage yet still experience a severe cost burden may be unable to conduct periodic maintenance and repair of their homes, and in turn, may contribute to a dilapidation and blight problem. All three of these situations should be of concern to policymakers and program managers.

HOUSING COSTS

Home values and housing costs were generally higher in the central and western parts of the state, and lower in inland Census tracts along the coastal plain. As shown in Map II.13 on the following page, contract rental costs tended to be highest in the populous Census tracts surrounding the state's entitlement areas, and relatively low in the rural areas between entitlement jurisdictions. Census tracts along the state's barrier islands were an exception; rental costs in that area were well above the overall median per tract.

Similarly, the median value of owner-occupied homes was generally higher in Census tracts to the west of Interstate 95 and along the coast, as shown in Map II.14 on page 51. Median home values were relatively low in Census tracts throughout the inner coastal plain.

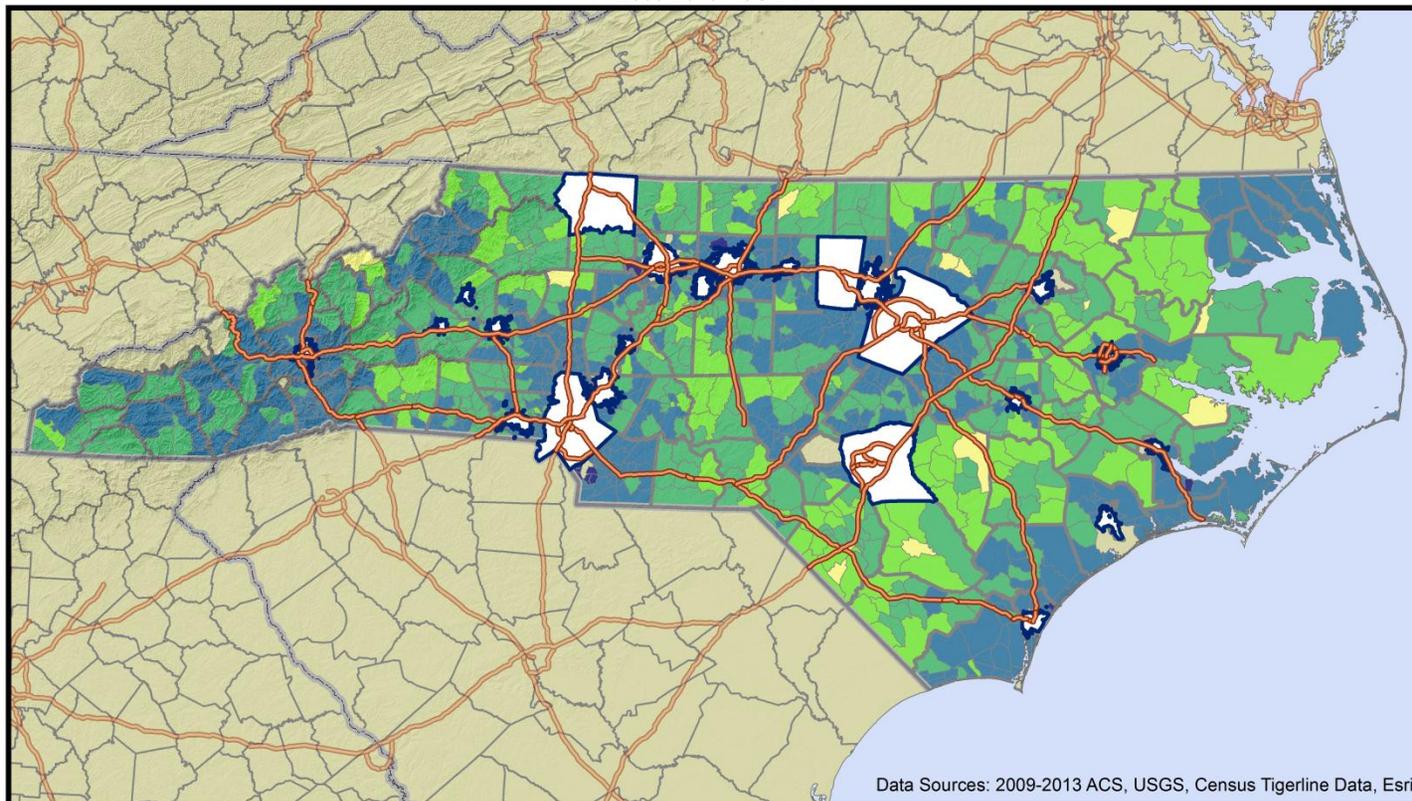
SUMMARY

The population of the state's non-entitlement areas has grown by an estimated 16.5 percent since 2000, according to the latest Census Bureau estimate released in 2014. Between the 2000 and 2010 Census counts, the state's non-entitlement population grew by around 673,000, with much of that growth attributable to an increase in the number of residents aged 55 and over. The largest percentage of the non-entitlement population was 35 to 54 years in age; however, that percentage fell over the decade from 30 to 28.6 percent of the total population. By contrast the share of the population aged 65 and older grew at over twice the rate of the overall population.

More than three-quarters of the state's non-entitlement residents were white in 2000 and 2010; nevertheless, white residents declined as a share of the population from 77.3 to 75.3 percent in the decade following 2000. Slow growth among the black population also contributed to a decline in the share of black non-entitlement residents of around one percentage point, and black residents represented 16.3 percent of the non-entitlement population in 2010. At the same time, the number of residents identifying as "other", or who belonged to two or more racial groups, more than doubled over the decade: together, these residents accounted for 5.5 percent of the population in 2010. Similarly, Hispanic residents of all races more than doubled in number and grew as a share of the non-entitlement population by over three percentage points. In 2010, the Hispanic population represented 6.9 percent of the total population.

Both Hispanic and black residents tended to account for larger shares of Census tract populations in the east of the state, particularly in the inner coastal plain. Black residents were generally more concentrated in the northern and southern portions of the coastal plain, with Hispanic residents tending to concentrate in the central-inner coastal plain. There were also large concentrations of Hispanic residents observed in Census tracts near the center of the state, notably around Siler City and Sanford.

Map II.13
Median Contract Rent
 Non-Entitlement Areas of North Carolina
 2009-2013 ACS Data



Legend

2009-2013 Median Contract Rent

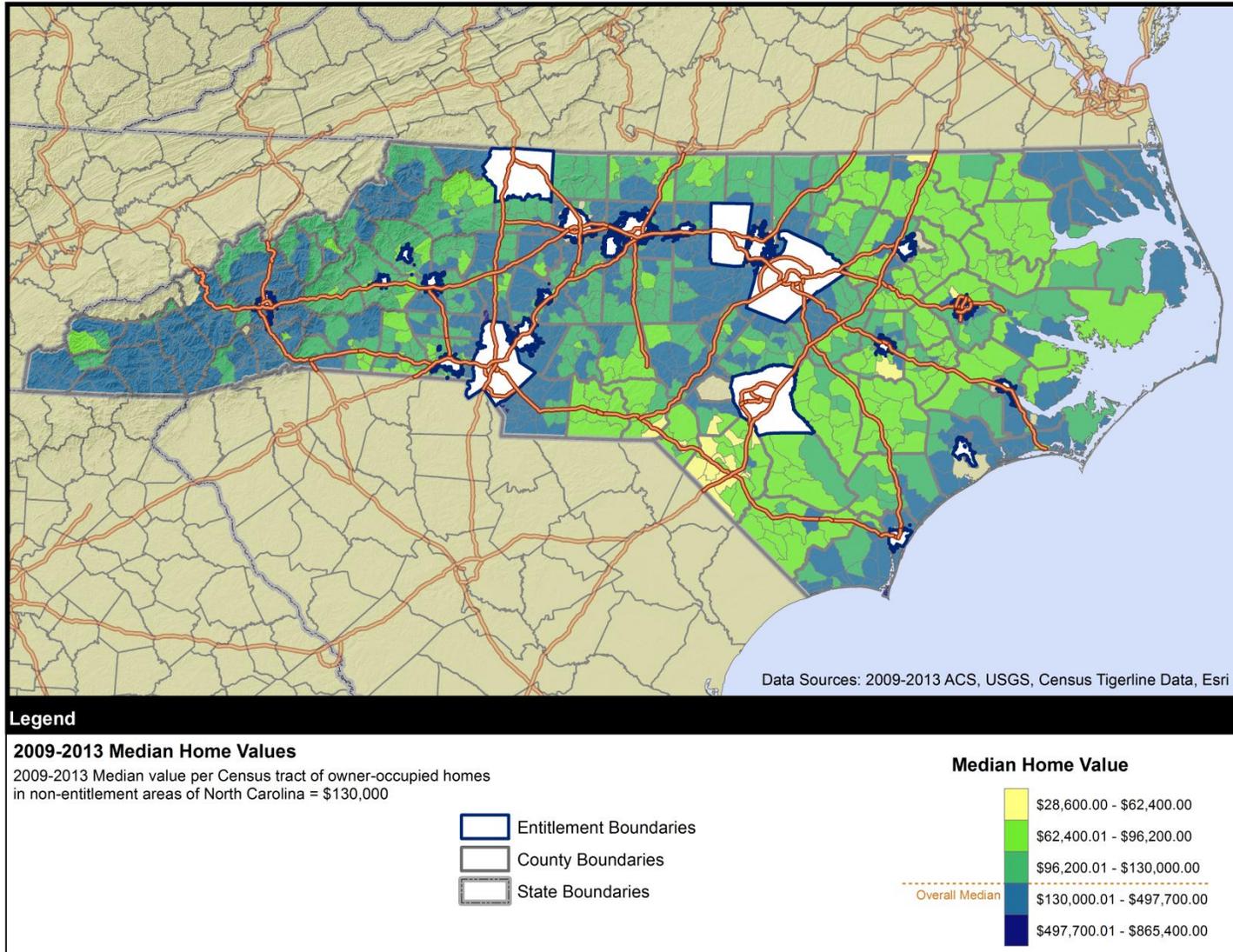
2009-2013 Median contract rental cost per Census tract of
 in non-entitlement areas of North Carolina = \$497

-  Entitlement Boundaries
-  County Boundaries
-  State Boundaries

Median Contract Rent



Map II.14
Median Home Value
 Non-Entitlement Areas of North Carolina
 2009-2013 ACS Data



Residents with disabilities accounted for 22.9 percent of the non-entitlement population in 2000, and tended to be more highly concentrated in rural Census tracts than in more populous tracts closer to the state's entitlement areas. The same geographic pattern was observed in 2009-2013, when roughly 15.5 percent of the population was counted as living with some form of disability. Note that the definition of disability employed by the Census Bureau in 2000 differed considerably from the one employed in 2008 and later. For that reason, the Census Bureau discourages direct comparisons between the two, and this definitional change may account for much of the apparent drop in the disability rate between 2000 and 2009-2013.

Growth in the non-entitlement labor force has been uneven, but largely positive, since 1990. The number of employed persons has also shown positive growth in most of the years within the same time period. However, that growth was punctuated by two periods of significant declines in the number of people working, the first beginning after 2000 and the second beginning after 2007. The latter period saw a more substantial drop in the number of employed workers and a corresponding spike in the unemployment rate, which reached 11.7 percent in 2010. However, the unemployment rate has declined steadily since February of that year, notwithstanding marked seasonal variation in unemployment.

As one might expect, the decline in the number of employed persons after 2007 coincided with a decline in the number of full- and part-time jobs in the state as a whole. Recent years have also seen a marked fluctuation in inflation-adjusted earnings for the average worker, as well as the inflation-adjusted income of the average state resident.

In the years since 2000, larger shares of households have moved into higher income brackets, and lower-income households have shrunk as a share of households overall. Nevertheless, turbulence in the labor market has contributed to a marked increase in the poverty rate throughout the state's non-entitlement areas, which grew from 12.5 percent in 2000 to 17.7 percent by 2009-2013. In both years, poverty rates in rural Census tracts along the inner coastal plain tended to be higher than in central, more populous Census tracts. The same was true of Census tracts in the south and west of the state.

Growth in the housing stock of the state's non-entitlement areas outpaced growth in the number of households, resulting in a 43.5 percent growth in the number of vacant units between 2000 and 2010. However, occupied units still accounted for a large majority, or 83.8 percent, of housing units throughout that area at the end of the decade. A majority of those occupied housing units were occupied by the people who owned them; however, there was a marked shift toward rental occupancy over the decade. Units that were rented or sold but not occupied accounted for a smaller share of vacant units at the end of the decade, while the share of units available for sale or rent grew. "Other vacant" units accounted for nearly a quarter of vacant units throughout the state's non-entitlement areas in 2010. These units tend to be more problematic than vacant units overall, as they are not available to the market place and may contribute to blight where they are grouped in close geographic proximity to one another. Though it was coastal and western Census tracts that saw the highest overall vacancy rates, "other vacant" units tended to represent a larger share of vacant units in central Census tracts, as well as those along the inner coastal plain.

As the housing stock grew between 2000 and 2009-2013, single-family housing units remained the dominant type of housing unit in the state's non-entitlement areas; these units represented

71.1 percent of the housing stock in recent estimates. Mobile homes also represented a relatively large percentage of housing units, at 20.4 percent in 2009-2013. However, this share represents a decline of three-percentage points over 2000. Meanwhile, apartment units have come to account for a greater share of housing units: 4.6 percent in recent estimates, up from 3.6 percent in 2000.

Small households, or those including only one or two members, represented around 60 percent of all non-entitlement households, and this share only grew over the decade. However, the state's non-entitlement areas also experienced a notable increase in the number of larger households, or those with five members or more.

In spite of this growth in the number of larger households, the percentage of households considered to be overcrowded or severely overcrowded fell after 2000, representing 2.3 percent of households in 2009-2013. Housing units are considered to be overcrowded if they include more than one resident per room.

Additional housing problems identified in Census and American Community Survey data relate to incomplete plumbing and kitchen facilities in housing units. Fewer than one percent of households were affected by either problem, though the percentage of units with incomplete kitchen facilities ticked up slightly between 2000 and 2009-2013, from 0.5 to 0.6 percent.

A more common problem was cost-burdened households, and this was, unfortunately, a problem that impacted a larger percentage of households in 2009-2013 than in 2000. Housing costs consumed more than 31 to 50 percent of household income in nearly 17 percent of households in 2009-2013, and an additional 13.5 percent of households were spending more than half of their monthly income on housing costs. Generally speaking, rental households were more impacted by cost-burdening than owner-occupied households, even those that were still under mortgage. Housing costs tended to be higher along the coast, in western Census tracts bordering on Tennessee, and in Census tracts surrounding the state's entitlement areas.

SECTION III. FAIR HOUSING LAW, STUDY, AND CASE REVIEW

As part of the AI process, existing fair housing laws, studies, cases, and other relevant materials were reviewed on a national and local scale. Results of this review are presented below.

FAIR HOUSING LAWS

FEDERAL FAIR HOUSING LAWS

Federal laws provide the backbone for U.S. fair housing regulations. While some laws have been previously discussed in this report, a brief list of laws related to fair housing, as defined on the U.S. Department of Housing and Urban Development's (HUD's) website, is presented below:

Fair Housing Act. Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits 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 (including children under the age of 18 living with parents or legal custodians, pregnant women, and persons securing custody of children under the age of 18), and handicap (disability).¹⁰

Title VIII was amended in 1988 (effective March 12, 1989) by the *Fair Housing Amendments Act* . . . In connection with prohibitions on discrimination against individuals with disabilities, the Act contains design and construction accessibility provisions for certain new multi-family dwellings developed for first occupancy on or after March 13, 1991.¹¹

Title VI of the Civil Rights Act of 1964. Title VI prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance.

Section 504 of the Rehabilitation Act of 1973. Section 504 prohibits discrimination based on disability in any program or activity receiving federal financial assistance.

Section 109 of the Housing and Community Development Act of 1974. Section 109 prohibits discrimination on the basis of race, color, national origin, sex or religion in programs and activities receiving financial assistance from HUD's Community Development and Block Grant Program.

Title II of the Americans with Disabilities Act of 1990. Title II prohibits discrimination based on disability in programs, services, and activities provided or made available by public entities. HUD enforces Title II when it relates to state and local public housing, housing assistance and housing referrals.

¹⁰ "HUD Fair Housing Laws and Presidential Executive Orders."

http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/FHLaws

¹¹ "Title VIII: Fair Housing and Equal Opportunity."

http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/progdesc/title8

Architectural Barriers Act of 1968. The Architectural Barriers Act requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 be accessible to and useable by handicapped persons.

Age Discrimination Act of 1975. The Age Discrimination Act prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance.

Title IX of the Education Amendments Act of 1972. Title IX prohibits discrimination on the basis of sex in education programs or activities that receive federal financial assistance.¹²

STATE AND LOCAL FAIR HOUSING LAWS

In addition to laws at the federal level, North Carolina residents are protected from discrimination in the housing market by the North Carolina Fair Housing Act (N.C. Gen. Stat. §41A). This chapter of North Carolina's General Statutes includes protections that are substantially equivalent to the Federal Fair Housing Act, prohibiting discrimination on the basis of race, color, religion, sex, national origin, disability, and familial status. However, the state law also includes a provision, at §41A-4(g), that prohibits discrimination in land-use planning based on the fact that a planned multifamily development will contain affordable housing units.

FAIR HOUSING IN THE UNITED STATES

THE FIRST FORTY YEARS OF THE FAIR HOUSING ACT

The Fair Housing Act of 1968 was a product of the tumultuous time in which it was passed. Coming near the end of a decade marked by concerted and often violent struggles for civil rights, it was a profound statement of a nation's commitment, despite considerable reluctance in many quarters, to work toward the end of segregation by race, color, religion, sex, and national origin. It was also, upon its passage, a relatively weak law: another sign of the social and political context in which it was passed. It was only after the enforcement provisions of the Act were considerably blunted that it was able to secure enough support to ensure its passage.¹³

Due in part to the weakening of those enforcement provisions, the Act was initially of only limited effectiveness in eradicating residential segregation, one of the policy goals that motivated passage of the law. According to one analyst, the first two decades of the Fair Housing Act constitute a "lost opportunity in terms of race relations in the United States¹⁴". Nevertheless, the period following the passage of the Act was marked by a "minority rights revolution¹⁵", whose germinal moment was the movement for civil rights for black Americans. This revolution was soon expanded to encompass the drive for equality for women, ethnic minorities, and the disabled.¹⁶ The civil rights movement had a limited impact on residential

¹²"HUD Fair Housing Laws and Presidential Executive Orders."

¹³ Denton, Nancy A. *Half Empty or Half Full: Segregation and Segregated Neighborhoods 30 Years After the Fair Housing Act*. Cityscape: A Journal of Policy Development and Research, 1999. Vol. 4, No. 3. P. 111.

¹⁴ *Ibid.*

¹⁵ Skrentny 2002. *The Minority Rights Revolution*. Harvard University Press, 2004.

¹⁶ Marsden, Peter V. *Social Trends in American Life: Findings from the General Social Survey since 1972*.

segregation, however, which has persisted since 1968 due in part to persistent discrimination in the housing market¹⁷¹⁸

However, the cultural shifts of the late twentieth century helped to pave the way for passage of the Fair Housing Amendments Act of 1988, which broadened the enforcement provisions of the Act, gave increased authority to the US Department of Housing and Urban Development (HUD) to administer and enforce fair housing law, and increased the penalties to those who violated the act.¹⁹ In addition, reflecting the impact of advocacy on behalf of those with disabilities as well as marked changes to the traditional family structure over the previous two decades²⁰, the 1988 law added new protections based on “handicap” and “familial status.”

The ten years following the passage of the 1988 amendments saw an increase in the number of fair housing complaints filed with HUD, as well as an evolution in housing discrimination to a form that was, in the estimation of former HUD Secretary Andrew Cuomo, “more sophisticated, less obvious, but more insidious.”²¹ An example of such segregation was to be found, according to a 1999 HUD study, in the home lending market. That study, which was based on the results of paired testing of home mortgage lenders in selected cities, concluded that minority applicants were given less time with loan officers than non-minority applicants, received less information on prospective loan products, and were quoted higher interests rates in most of the cities included in the study. This differential treatment occurred in spite of the fact that the paired testers represented themselves as being similarly situated with respect to credit history and other relevant characteristics.²²

It was not clear in the late 1990s whether HUD’s increasing fair housing case load was the result of increasing segregation or growth in the number of US residents taking advantage of newly expanded fair housing enforcement measures. To help answer this question, HUD conducted a massive three-part study of discrimination in metropolitan housing markets, publishing the results of the first phase in 2000. In the course of the study HUD, once again availing itself of the paired testing employed in earlier studies, demonstrated the persistence of housing discrimination on the basis of race and ethnicity and its continuation into the twenty-first century. As in the 1999 study on mortgage lending, the HUD report revealed that minority housing seekers were, on average, shown fewer units and given fewer housing options than their majority counterparts, even when similarly situated with respect to their financial status.²³ These findings were reinforced by a study conducted jointly by the University of Southern California and Oregon State University on the Los Angeles County housing market in 2006.²⁴

¹⁷ Denton 1999.

¹⁸ Yinger, John. *Measuring Racial Discrimination with Fair Housing Audits: Caught in the Act*. The American Economic Review, Vol. 76, No. 5: 1986. P. 881. This study, based on the results of paired fair housing tests in the city of Boston, concluded that housing agents, in “[catering] to the prejudices of current or potential white customers”, told black housing seekers about 30 percent fewer available housing units. A similar methodology was employed in a 2012, which demonstrated the persistence of this form of discrimination (See “Housing Discrimination Against Racial and Ethnic Minorities 2012,” published by the US Department of Housing and Urban Development).

¹⁹ Denton 1999.

²⁰ Marsden 2008

²¹ Janofsky, Michael. “HUD Plans Nationwide Inquiry on Housing Bias.” *The New York Times*, 17 November 1998.

²² Turner, Margery A. et al. “What We Know About Mortgage Lending Discrimination in America”. The Urban Institute. September 1999.

²³ *The Housing Discrimination Study*. Department of Housing and Urban Development. (HDS 2000).

²⁴ Carpusor, Adrian and William Loges. “Rental Discrimination and Ethnicity in Names.” *Journal of Applied Social Psychology* 36(4).

Recent Trends in Fair Housing Law and Policy

Released by the Poverty & Race Research Action Council in January 2008, *Residential Segregation and Housing Discrimination in the United States* asserts that many current governmental efforts to further fair housing actually result in furthering unfair housing practices across the U.S. This article suggests that fair housing efforts can cause residential segregation. For example, if the majority of public housing residents are non-white and most public housing accommodations are grouped in the same Census tracts, residential segregation is resultant. Similarly, many Section 8 voucher holders are racial or ethnic minorities, and most housing that accepts Section 8 vouchers is grouped in selected areas, which again results in residential segregation. The report offers recommendations to curb such residential segregation, including dispersing public housing developments throughout cities and communities and providing greater incentives for landlords with several properties to accept the vouchers.²⁵

Published in 2009 by the National Fair Housing Alliance, *For Rent: No Kids!: How Internet Housing Advertisements Perpetuate Discrimination* presented research on the prevalence of discriminatory housing advertisements on popular websites such as Craigslist. According to the article, while newspapers are prohibited from publishing discriminatory housing advertisements, no such law exists for websites like Craigslist, as they are considered interactive internet providers rather than publishers of content. As such, they are not held to the same legal standards as newspapers. While individual landlords who post discriminatory advertisements may be held responsible, there are no such standards for companies like Craigslist that post the discriminatory advertisements. Newspapers and other publishers of content are required to screen the advertisements they accept for publishing for content that could be seen as discriminatory. This may include phrases like “no children” or “Christian only,” which violate provisions of the Fair Housing Act that state families with children and religious individuals are federally protected groups.²⁶

In May 2010, the National Fair Housing Alliance published a fair housing trends report, *A Step in the Right Direction*, which indicated that recent years have demonstrated forward movement in furthering fair housing. The report began with a commendation of HUD’s federal enforcement of fair housing law and noted the agency’s willingness to challenge local jurisdictions that failed to affirmatively further fair housing. In response to the recent foreclosure crisis, many credit institutions have implemented tactics to reduce risk. However, this report suggests that policies that tighten credit markets, such as requiring larger cash reserves, higher down payments, and better credit scores, may disproportionately affect lending options for communities of color and women. *A Step in the Right Direction* concludes with examples of ways in which the fair housing situation could be further improved, including addressing discriminatory internet advertisements and adding gender identity, sexual orientation, and source of income as federally protected classes.²⁷

²⁵ U.S. Housing Scholars and Research and Advocacy Organizations. *Residential Segregation and Housing Discrimination in the United States*. January 2008. http://prrac.org/pdf/FinalCERD_HousingDiscriminationReport.pdf

²⁶ National Fair Housing Alliance. *For Rent: No Kids!: How Internet Housing Advertisements Perpetuate Discrimination*. August 2009. <http://www.nationalfairhousing.org/LinkClick.aspx?fileticket=zgbukJP2rMM%3D&tabid=2510&mid=8347>

²⁷ National Fair Housing Alliance. *A Step in the Right Direction: 2010 Fair Housing Trends Report*. May 2010. <http://www.nationalfairhousing.org/Portals/33/Fair%20Housing%20Trends%20Report%202010.pdf>

The positive note that the NFHA struck in its 2010 report carried over into the following year's *The Big Picture: How Fair Housing Organizations Challenge Systemic and Institutionalized Discrimination*, published by the Alliance in April of 2011. This report began by noting an encouraging downward trend in the proportion of individuals in large metropolitan areas living in segregation, which had dropped from 69 to 65 percent between 2000 and 2010, according to census data from 2010. The report also highlighted the work of fair housing organizations to combat systemic and institutionalized discrimination produced by exclusionary zoning, NIMBYism, the dual credit market, and other fair housing challenges, often on limited budgets and with limited personnel. The NFHA closed its 2011 report by praising the work of private fair housing organizations while underscoring the need for continued work.²⁸

The 2012 report from the NFHA focused on issues of fair housing in the context of the shifting demographic composition of the United States, where the white population is projected to no longer represent a majority of residents within thirty years. The report discussed encouraging signals from HUD and the Justice Department, who have "increased their efforts and announced landmark cases of mortgage lending, zoning, and other issues that get to the heart of the [Fair Housing] Act: promoting diverse and inclusive communities²⁹." The report also highlights a new arena for discrimination in housing, which has emerged as a result of the massive level of foreclosures in the country in recent years: uneven maintenance of Real Estate Owned (REO) properties in white and minority areas. In concluding, the report hails the creation of the Consumer Financial Protection Bureau as a new ally for fair housing and equal opportunity.³⁰

However, even as the 2012 NFHA underscored maintenance of foreclosed properties as a nascent form of housing discrimination, a HUD report issued in the following year demonstrated the persistence of more traditional forms of discrimination. Echoing the results of earlier paired tests for housing discrimination, the study demonstrated that where differences in the treatment of minority and white housing seekers occur, it is the white housing seekers who are more likely to benefit from such differential treatment. However, on an encouraging note, the study also demonstrated that well-qualified buyers are generally equally likely to get an appointment to hear about at least one available unit, regardless of race.³¹

The 2013 from the NFHA outlines an ambitious policy goal: expansion of the Fair Housing Act to prohibit discrimination based on source of income, sexual orientation, gender identity, and marital status. The report relates that cases of housing discrimination in general increased between 2011 and 2012, and that complaints based on non-protected statuses (source of income, etc.) were included in that upward trend. In spite of this, only 12 states include protections based on source of income, 21 states prohibit discrimination based on sexual orientation, sixteen states protect against discrimination based on gender identity, and 22 states offer protections based on marital status (the District of Columbia also extends protections on all of these bases). In concluding the report, the NFHA advocates the modernization and expansion of the FHA to bring the protection of individuals based on source of income, sexual orientation, gender identity, and marital status within its compass.

²⁸*The Big Picture: How Fair Housing Organizations Challenge Systemic and Institutionalized Discrimination*. National Fair Housing Alliance 2011 Fair Housing Trends Report. 29 April 2011.

<http://www.nationalfairhousing.org/LinkClick.aspx?fileticket=SbZH3pTEZhs%3d&tabid=3917&mid=5321>

²⁹ <http://www.nationalfairhousing.org/LinkClick.aspx?fileticket=GBv0ZVJp6Gg%3d&tabid=3917&mid=5321>

³⁰ *Ibid.*

³¹ Turner, Margery A. et al. "Housing Discrimination Against Racial and Ethnic Minorities 2012." The Urban Institute. June 2013.

In its 2014 Fair Housing trends report, entitled “Expanding Opportunities: Systemic Approaches to Fair Housing”, the NFHA began by lauding the efforts of HUD, DOJ, and private non-profit fair housing organizations for their efforts over the prior year in promoting fair housing choice across the United States. The report also noted an increase in the number of fair housing complaints relating to real estate sales, homeowner’s insurance, and housing advertisements, even as the overall number of housing complaints remained relatively steady. The 2014 report also featured a regional analysis of housing discrimination complaints, which indicated that complaints of housing discrimination were more common in the more racially and ethnically segregated metropolitan statistical areas of the country.³²

A CHANGING FAIR HOUSING LANDSCAPE

NATIONAL FAIR HOUSING CASES

As noted in the introduction to this report, provisions to affirmatively further fair housing (AFFH) are long-standing components of HUD’s Housing and Community Development programs. In fact, in 1970, *Shannon v. HUD* challenged the development of a subsidized low-income housing project in an urban renewal area of Philadelphia that was racially and economically integrated. Under the Fair Housing Act, federal funding for housing must further integrate community development as part of furthering fair housing, but the plaintiffs in the Shannon case claimed that the development would create segregation and destroy the existing balance of the neighborhood. As a result of the case, HUD was required to develop a system to consider the racial and socio-economic impacts of their projects.³³ The specifics of the system were not decided upon by the court, but HUD was encouraged to consider the racial composition and income distribution of neighborhoods, racial effects of local regulations, and practices of local authorities.³⁴ The Shannon case gave entitlement jurisdictions the responsibility of considering the segregation effects of publicly-funded housing projects on their communities as they affirmatively further fair housing.

More recently, in a landmark fraud case, Westchester County, New York, was ordered to pay more than \$50 million to resolve allegations of misusing federal funds for public housing projects and falsely claiming their certification of affirmatively furthering fair housing. The lawsuit was filed in 2007 by the Anti-Discrimination Center (ADC), a New York-based non-profit organization, under the False Claims Act. According to the ADC, the County “failed to consider race-based impediments to fair housing choice; failed to identify and take steps to overcome impediments; and failed to meet its obligations to maintain records concerning its efforts.”

In a summary judgment in February 2009, a judge ruled that the County had made “false certifications on seven annual AFFH certifications and on more than a thousand implied certifications of compliance when it requested a drawdown of HUD funds”. Pursuant to a settlement agreement brokered by the Obama Administration in April 2009, Westchester County was required to pay more than \$30 million to the federal government, with roughly

³² *Expanding Opportunity: Systemic Approaches to Fair Housing*. National Fair Housing Alliance. August 13, 2014.

³³ U.S. HUD. *39 Steps Toward Fair Housing*. <http://www.hud.gov/offices/ftheo/39steps.pdf>

³⁴ Orfield, Myron. “Racial Integration and Community Revitalization: Applying the Fair Housing Act to the Low Income Housing Tax Credit.” *Vanderbilt Law Review*, November 2005.

\$20 million eligible to return to the County to aid in public housing projects. The County was also ordered set aside \$20 million to build public housing units in suburbs and areas with mostly white populations, and to promote legislation “currently before the Board of Legislators to ban ‘source-of-income’ discrimination in housing”.³⁵

Finding that Westchester had failed to affirmatively further fair housing in the manner agreed upon in the earlier settlement, HUD rejected the County’s AFFH certification and discontinued federal funding in 2011. The case is likely to have ramifications for entitlement communities across the nation; activities taken to affirmatively further fair housing will likely be held to higher levels of scrutiny to ensure that federal funds are being spent to promote fair housing and affirmatively further fair housing. The case also signals an increased willingness on the part of HUD to bring enforcement pressure to bear in order to insure that state and local jurisdictions comply with the AFFH requirements.

Affirmatively Furthering Fair Housing

At the same time that HUD has pursued a more active role in fair housing enforcement, the agency has sought to bring additional guidance and clarity to fair housing policy. This effort was inspired in part by the agency’s own assessment of shortcomings in current policy and in part by criticism from other agencies; notably the Government Accountability Office (GAO).³⁶

In 2009, HUD noted that many of the AIs it reviewed as part of an internal study did not conform to the agency’s guidelines. This finding was reaffirmed in a 2010 study conducted by the GAO, which sought to assess the effectiveness of Analyses of Impediments as a tool to affirmatively further fair housing, as well as their effectiveness as planning documents. According to the GAO, an estimated 29 percent of CDBG and HOME grantees’ AIs were prepared in 2004 or earlier, and were therefore likely to be of limited usefulness in current planning efforts. Furthermore, the GAO found that those AIs that were up to date largely lacked features that would render them more effective as planning documents, including timetables and the signatures of top elected officials. More generally, the GAO noted that HUD guidelines concerning AIs are unclear, and that its requirements for the analyses are minimal³⁷. Under those requirements, the agency observed, grantees are “not required through regulation to update their AIs periodically, include certain information, follow a specific format in preparing AIs, or submit them to HUD for review”³⁸.

The conclusion of the GAO study is reflected in its title: *HUD Needs to Enhance Its Requirements and Oversight of Jurisdictions’ Fair Housing Plans*. In response to the criticism of the GAO, as well as a longstanding recognition on the part of HUD that fair housing policy stood in need of improvement and clarification, the agency developed and published a proposed rule entitled *Affirmatively Furthering Fair Housing* in July of 2013. The proposed rule represents a substantial restructuring of the AFFH process, eliminating the AI and replacing it with the Assessment of Fair Housing (AFH). According to the rule, the AFH will (1) incorporate key demographic and econometric metrics specifically identified by HUD, (2) be completed

³⁵ <http://www.hud.gov/content/releases/settlement-westchester.pdf>

³⁶ 24 CFR §5, 91, 92, et al. (2013)(Proposed Rule)

³⁷ “HUD Needs to Enhance Its Requirements and Oversight of Jurisdictions’ Fair Housing Plans”. *Government Accountability Office*. September 2010.

³⁸ *Ibid.*, page 32.

with nationally uniform data provided by HUD, and (3) be submitted to HUD for review in advance of the consolidated plan to insure that the findings of the fair housing analysis are fully integrated into the consolidated planning process.³⁹ The comment period for the proposed rule ended in September of 2013. The final rule was announced on July 8, 2015 and published on July 16, 2015.

As noted in the winter edition of the Pennsylvania Association of Housing and Redevelopment Agencies Monitor, “the [proposed rule’s] four specifically articulated goals are [as follows]:

1. “Improve integrated living patterns and overcome historic patterns of segregation;
2. Reduce or eliminate racially and ethnically concentrated areas of poverty;
3. Reduce disparities in access to community assets such as education, transit access, employment, as well as exposure to environmental health hazards and other stressors that harm a person’s quality of life; and
4. Address disproportionate housing needs by protected classes⁴⁰.”

Note that because the new requirements set forth in the rule will not take effect immediately, the current AI effort is being undertaken in conformance with HUD guidance that is currently in place, as articulated in the Fair Housing Planning Guide, subsequent memoranda, and as required by the AFFH rule itself.

Discriminatory Effects and the Fair Housing Act

In addition to the AFFH rule, HUD finalized a rule in February 2013 that was intended to “formalize HUD’s long-held interpretation of the availability of ‘discriminatory effects’ liability under the Fair Housing Act⁴¹.” According to HUD, individuals and businesses may be held liable for policies and actions that are neutral on their face but have a discriminatory effect on housing choice. This theory of liability had not yet been articulated by the signing of the Civil Rights Acts of 1964 or 1968; however, it has been an important test for discrimination in employment since the Supreme Court found in 1971⁴² that the Civil Rights Act “proscribes not only overt discrimination but also practices that are fair in form, but discriminatory in operation⁴³.”

The first test of “disparate impact theory” in housing law came in 1974, *with United States v. City of Black Jack*⁴⁴. In that case, the government alleged that the City of Black Jack had “exercised its zoning powers to exclude... a federally-subsidized housing development”, thereby excluding residents of low-income housing, who were disproportionately black.⁴⁵ In deciding the matter, the Eight Circuit Court maintained that a plaintiff “need prove no more

³⁹ 24 CFR §5, 91, 92, et al. (2013)(Proposed Rule)

⁴⁰ Poltrock, Leigh A. “Affirmatively Furthering Fair Housing: The Good, the Bad, and the Ugly of the Proposed Rule and Draft Assessment Tool.” *Pennsylvania Association of Housing and Redevelopment Agencies Monitor*. Winter 2014-2015, page 19. Accessible at <http://pahra.org/wp-content/uploads/2015/01/PAHRA-Monitor-Winter-2014-15.pdf>

⁴¹ 24 CFR §100 (2013)

⁴² Garrow, David J. “Toward a Definitive History of *Griggs v. Duke Power Company*”. 67 *Vand. L. Rev.* 197 (2014).

⁴³ *Griggs v. Duke Power Co.*, 401 U.S. 430 (1971).

⁴⁴ Rich, Joseph D. “HUD’s New Discriminatory Effects Regulation: Adding Strength and Clarity to Efforts to End Residential Segregation.” *Lawyers’ Committee for Civil Rights Under Law*. May 2013.

⁴⁵ *United States v. City of Black Jack, Missouri*, 508 F.2d 1179, 1184 (8th Cir. 1974)

than that the conduct of the defendant actually or predictably results in racial discrimination” to make a case that the conduct is itself discriminatory⁴⁶.

The theory of discriminatory effect established in this case has been consistently applied in fair housing cases and upheld in numerous district court decisions.⁴⁷ However, disparate impact theory was to face a considerable legal challenge in early 2015 in the case of *Texas Department of Housing and Community Affairs v. The Inclusive Communities Project*. In this case, the Supreme Court of the United States was asked to finally settle the question of whether or not housing providers and policy makers could be held liable not just for intentional discrimination, but for the effects of neutral policies that produce discriminatory outcomes.

Texas Department of Housing and Community Affairs v. The Inclusive Communities Project

In 2008, a Dallas-based non-profit organization called the Inclusive Communities Project (“the Project”) sued the Texas Department of Housing and Community Affairs (“the Department”), claiming that the point system by which it allocates federal tax subsidies serves to concentrate subsidized housing in low-income communities.⁴⁸ In the lawsuit, the Project relied in part on disparate impact theory, which had been established through decades of jurisprudence but upon which the Supreme Court had, at the time, never definitively ruled.

According to the Project, the Department disproportionately allocated low-income housing tax credits in minority areas while denying those credits in predominantly white communities. In addition to the direct effect of concentrating units subsidized through these tax credits, the Project alleged that this manner of allocation led to the further concentration of Section 8 Housing in those same areas⁴⁹, which served to limit housing options for low-income, minority residents to areas with high concentrations of racial minority residents.⁵⁰ In its original complaint, the Project argued both that the point scheme was intentionally discriminatory and that it produced a disparate impact on minority residents. The District Court for the Northern District of Texas found that the Project had failed to prove intentional discrimination but had proved its disparate impact claim.

Having been upheld in the U.S. Court of Appeals for the Fifth Circuit, the matter then moved to the Supreme Court at the request of the Department.⁵¹ In asking the Supreme Court to consider the case, the Department presented the court with two questions: First, “are disparate-impact claims cognizable under the Fair Housing Act?”⁵² In other words, does the Act permit disparate-impact claims? Second, in the event that the Court finds that the FHA does allow such claims, the Department also asked “what are the standards and burdens of proof that should

⁴⁶ *Ibid.*

⁴⁷ 24 CFR §100 (2013); Rich, Joseph D. “HUD’s New Discriminatory Effects Regulation: Adding Strength and Clarity to Efforts to End Residential Segregation.” Lawyers’ Committee for Civil Rights Under Law. May 2013.

⁴⁸ *Inclusive Communities Project v. Texas Department of Housing and Community Affairs* (2014).

⁴⁹ *Ibid.* Section 8 housing vouchers, which are often not accepted by private landlords, cannot be turned down by those who receive low income housing tax credits.

⁵⁰ *Ibid.*

⁵¹ Howe, Amy. “Will the third time be the charm for the Fair Housing Act and disparate-impact claims? In Plain English.” Supreme Court of the United States Blog. January 6, 2015. Accessible at “<http://www.scotusblog.com/2015/01/will-the-third-time-be-the-charm-for-the-fair-housing-act-and-disparate-impact-claims-in-plain-english/>”

⁵² *Texas Department of Housing and Community Affairs v. The Inclusive Communities Project* (2014). Petition for a Writ of Certiorari.

apply?”⁵³ The Court’s decision on this matter, handed down on June 25, 2015, upheld the availability of discriminatory effects liability under the Fair Housing Act.⁵⁴

STATE FAIR HOUSING CASES

Recent U.S. Department of Justice Cases

The U.S. Department of Justice (DOJ) enacts lawsuits on behalf of individuals based on referrals from HUD. Under the Fair Housing Act, the DOJ may file lawsuits in the following instances:

- Where there is reason to believe that a person or entity is engaged in what is termed a “pattern or practice” of discrimination or where a denial of rights to a group of people raises an issue of general public importance;
- Where force or threat of force is used to deny or interfere with fair housing rights; and
- Where persons who believe that they have been victims of an illegal housing practice file a complaint with HUD or file their own lawsuit in federal or state court.⁵⁵

The Department of Justice has filed six complaints against housing providers in the State of North Carolina in the last ten years. Four of those complaints related to alleged discrimination on the basis of disability, one related to discrimination on the basis of race, and one cited alleged discrimination on the basis of sex. The latter case was resolved in July of this year, and the resulting settlement of more than \$2.7 million represented the largest awarded to date in a sexual harassment complaint filed under the Fair Housing Act. The types of discriminatory actions cited in disability-based complaints included the following (names of cases in parentheses):

- Failure to design and build housing units in a manner that makes them accessible to residents with disabilities (*United States v. Joyner, et al.*);
- A town’s refusal to allow the transfer of a public housing resident to a wheelchair-accessible unit (*United States v. Town of Chapel Hill*);
- Refusal, on the part of a town and its board of adjustments, to allow up to eight men with drug and alcohol addictions to live together in an environment designed to support their recovery (*United States and Oxford House, Inc. v Town of Garner and the Town of Garner Board of Adjustment*); and
- A bank’s requirement that home loan applicants with disabilities provide a letter from their doctor as part of the loan application process (*United States v. Bank of America*).

In addition to those cases, the Department of Justice filed a complaint alleging that a manager of 24 single-family properties had discriminated against African-American residents through refusal to perform maintenance and retaliation against those who requested maintenance; verbal harassment with racial slurs and epithets; and making other discriminatory statements.⁵⁶ In that case, the DOJ was unsuccessful.

⁵³ *Ibid.*

⁵⁴ *Texas Department of Housing and Community Affairs v. The Inclusive Communities Project* (2015)

⁵⁵ “The Fair Housing Act.” The United States Department of Justice. http://www.justice.gov/crt/about/hce/housing_coverage.php

⁵⁶ *United States v. Cochran*

However, in a case that was resolved in July of this year, the DOJ alleged that employees of a public housing agency sexually harassed female participants in the Section 8 Voucher program, as well as applicants to the program. In settling the case, the housing agency agreed to pay \$2.7 million in damages to the victims of the sexual harassment and more than \$25,000 in civil penalties.⁵⁷

Recent State-Level Cases

Fair housing civil cases have also been brought by legal representatives and stakeholders at the state and local level. One such case, *Sellers, et al v. Southeastern Community and Family Services*, was the basis for a DOJ complaint that ended in the largest sexual harassment settlement ever assessed under the Fair Housing Act, as discussed above. The Fair Housing Project of Legal Aid NC participated in this case, as in three other recent cases:

- One case, settled in March of this year, alleged that a Raleigh homeowners association (HOA) imposed discriminatory terms and conditions upon a resident with disabilities. This case was brought following a North Carolina Human Relations Commission investigation that ended with the determination that there was reasonable cause to believe that the HOA's activities were discriminatory.⁵⁸
- In another case, the Royal Oak Concerned Citizens Association filed a complaint against the County of Brunswick to challenge the county's plans to expand a landfill located within a historically African-American community. As a result of the case, which was filed under the state's fair housing law, the county will use the land originally designated for the landfill expansion to house a new school.⁵⁹ The Fair Housing Project also participated in this case, which was initiated by the Center for Civil Rights at the University of North Carolina.
- In addition, a case settled in 2014 successfully challenged the efforts of the Village of Pinehurst to block an affordable housing development for senior citizens. This case is noteworthy for the fact that it cited, among other causes of action, practices that are explicitly prohibited under state, but not federal, fair housing law. Specifically, the case included an allegation that the village had violated §41A-4(g) of the North Carolina Fair Housing Act, which prohibits discrimination in land-use decisions on the basis that a prospective development includes affordable housing units.⁶⁰

SUMMARY

Residents of North Carolina's non-entitlement areas are protected from discrimination in the housing market by federal and state laws. The Federal Fair Housing Act provides the foundation for fair housing enforcement throughout the United States, prohibiting discrimination in a wide range of housing transactions on the basis of race, color, religion, national origin, sex, familial status, and disability. North Carolina also prohibits discrimination

⁵⁷ *United States v. Southeastern Community and Family Services, Inc.*, consolidated with *Sellers, et al v. Southeastern Community and Family Services*

⁵⁸ *N.C. Human Relations Comm'n ex rel Block v. Carriages at Allyn's Landing Owners Ass'n, Inc.*

⁵⁹ *Royal Oak Concerned Citizens Ass'n, et al v. Brunswick County*

⁶⁰ *Align Development, et al. v. Village of Pinehurst*

on these same bases in the state Fair Housing Act, and also prohibits discrimination in land-use decisions on the basis that a prospective housing development will include affordable housing units.

Housing law and jurisprudence has evolved considerably since the FHA was first enacted in 1968. The Fair Housing Amendments Act of 1988 added additional protections, strengthened the Act's relatively weak enforcement provisions, and gave the Department of Housing and Urban Development enhanced authority to enforce the Act. In addition, since the early 1970s the FHA has consistently been interpreted to apply to laws and policies that are apparently neutral with respect to protected class status, but which nevertheless "actually or predictably"⁶¹ result in discrimination. In 2013, HUD finalized a rule formalizing its interpretation of discriminatory effects liability under the FHA.

That interpretation was reaffirmed in a June 25, 2015 Supreme Court decision in *Texas Department of Housing and Community Affairs v. Inclusive Communities Project, Inc.* That case originated in a lawsuit against the Texas Department of Housing and Community Affairs ("the Department") on the grounds that the process by which it awarded low income housing tax credits had the effect of concentrating affordable housing in areas with high concentrations of minority residents. In bringing the suit, the Inclusive Communities Project relied in part on the disparate impact theory, and it was that theory that the Department sought to challenge in asking the Supreme Court to hear the case. Ultimately, the Court held that individuals, businesses, and government agencies could be held liable for the disparate impacts of their policies.

Following on the heels of the Supreme Court decision, HUD announced a final rule significantly revamping its long-standing requirement to affirmatively further fair housing (AFFH). In developing and finalizing this rule, HUD has substantially revised the AFFH process by (1) replacing the analysis of impediments with the assessment of fair housing (AFH), (2) integrating fair housing planning into the consolidated planning process, and (3) providing a fair housing assessment tool and nationally standardized datasets, among other changes. Generally speaking, the new rule will apply to local entitlement jurisdictions that are due to begin their next five-year planning cycle in 2017 or later. For smaller entitlement jurisdictions, as well as states and insular areas, the new rule will apply to those set to begin their next planning cycle in 2018 or later. Until jurisdictions are required to submit an AFH, they are required to continue submitting analyses of impediments.

Under certain circumstances, the United States Department of Justice (DOJ) will file a fair housing complaint on behalf of residents who are suspected to have suffered a violation of fair housing law. The DOJ has filed six such complaints against housing providers throughout the state in the last ten years, one of which resulted in the largest monetary settlement ever assessed in a sexual harassment case brought under the Fair Housing Act, in which damages alone amounted to more than \$2.7 million. However, the DOJ complaints more commonly alleged discrimination on the basis of disability, often relating to failure to make reasonable accommodation or allow reasonable modifications.

⁶¹ *United States v. City of Black Jack, Missouri*, 508 F.2d 1179, 1184 (8th Cir. 1974) It was racial discrimination, specifically, that was at issue in this case.

In addition to the DOJ complaints, state agencies and organizations have also brought civil actions against housing providers, under state and federal law, for alleged discrimination in the housing market. Two of these cases related to land-use decisions, and one of them cited discrimination in land-use decisions based on the fact that a prospective development would consist of affordable units, a cause of action that is explicitly laid out in state, but not federal, fair housing law.

SECTION IV. REVIEW OF THE EXISTING FAIR HOUSING STRUCTURE

The purpose of this section is to provide a profile of fair housing in the State of North Carolina based on a number of factors, including an enumeration of key agencies and organizations that contribute to affirmatively furthering fair housing, evaluation of the presence and scope of services of existing fair housing organizations, and a review of the complaint process.

FAIR HOUSING AGENCIES

FEDERAL AGENCIES

U.S. Department of Housing and Urban Development

The U.S. Department of Housing and Urban Development (HUD) oversees, administers, and enforces the Federal Fair Housing Act. HUD's regional office in Atlanta oversees housing, community development, and fair housing enforcement in North Carolina, as well as in Mississippi, Tennessee, Kentucky, Georgia, South Carolina, Alabama, Florida, the U.S. Virgin Islands, and Puerto Rico. Contact information for HUD is listed below⁶²:

Address:

Office of Fair Housing and Equal Opportunity
Department of Housing and Urban Development
451 Seventh Street SW, Room 5204
Washington, DC 20410-2000

Telephone: (202) 708-1112

Toll Free: (800) 669-9777

Web Site: <http://www.HUD.gov/offices/fheo/online-complaint.cfm>

The contact information for the regional HUD office in Atlanta is:

Address:

Atlanta Regional Office
U.S. Department of Housing and Urban Development Southeast Office
40 Marietta Street
Atlanta, GA 30303

Telephone: (404) 331-5001

Website: <http://www.HUD.gov>

The Office of Fair Housing and Equal Opportunity (FHEO) in HUD's Atlanta office enforces the Fair Housing Act and other civil rights laws that prohibit discrimination in housing, mortgage lending, and other related transactions in North Carolina. HUD also provides education and outreach, monitors agencies that receive HUD funding for compliance with civil rights laws,

and works with state and local agencies under the Fair Housing Assistance Program (FHAP) and Fair Housing Initiative Program (FHIP), as described below.

Fair Housing Assistance Program

The Fair Housing Assistance Program (FHAP) was designed to support local and state agencies that enforce local fair housing laws, provided that these laws are substantially equivalent to the Fair Housing Act. Substantial equivalency certification is a two-phase process: in the first phase, the Assistant Secretary for Fair Housing and Equal Opportunity makes a determination as to whether a state or local law is substantially equivalent to the Federal Fair Housing Act on its face. Once this determination has been made, and the law has been judged to be substantially equivalent on its face, the agency enforcing the law is certified on an interim basis for a period of three years. During those three years, the local enforcement organization “builds its capacity to operate as a fully certified substantially equivalent agency,” and FHAP grants during this time period are issued to support the process of building capacity. When the interim certification period ends after three years, the Assistant Secretary issues a determination on whether or not the state law is substantially equivalent to the Fair Housing Act “in operation”, this is the second phase of the certification process. If the law is judged to be substantially equivalent in operation, the agency enforcing the law is fully certified as a substantially equivalent agency for five years.

HUD will typically refer most complaints of housing discrimination to a substantially equivalent state or local agency for investigation (such complaints are dual-filed at HUD and the State or local agency), if such an agency exists and has jurisdiction in the area in which the housing discrimination was alleged to have occurred. When federally subsidized housing is involved, however, HUD will typically investigate the complaint.

The benefits of substantially equivalent certification include the availability of funding for local fair housing activities, shifted enforcement power from federal to local authorities, and the potential to make the fair housing complaint process more efficient by vesting enforcement authority in those who are more familiar with the local housing market. In addition, funding may be available to support partnerships between local FHAP grantees and private fair housing organizations.

The North Carolina Human Relations Commission currently serves state residents as a FHAP participant through administration and enforcement of the state’s Fair Housing Act (N.C. Gen. Stat. §41A).

Fair Housing Initiative Program

The Fair Housing Initiative Program (FHIP) is designed to support fair housing organizations and other non-profits that provide fair housing services to people who believe they have faced discrimination in the housing market. These organizations provide a range of services including initial intake and complaint processing, referral of complainants to government agencies that enforce fair housing law, preliminary investigations of fair housing complaints, and education and outreach on fair housing law and policy.

FHIP funding is available through three initiatives⁶³: the Fair Housing Organizations Initiative (FHOI), the Private Enforcement Initiative (PEI), and the Education and Outreach Initiative (EOI). These initiatives are discussed in more detail below:

- **The Fair Housing Organizations Initiative (FHOI):** FHOI funds are designed to help non-profit fair housing organizations build capacity to effectively handle fair housing enforcement and outreach activities. A broader goal of FHOI funding is to strengthen the national fair housing movement by encouraging the creation of fair housing organizations.
- **The Private Enforcement Initiative (PEI):** PEI funds are intended to support the fair housing activities of established non-profit organizations, including testing and enforcement, and more generally to offer a “range of assistance to the nationwide network of fair housing groups”.
- **The Education and Outreach Initiative (EOI):** EOI funding is available to qualified fair housing non-profit organizations as well as State and local government agencies. The purpose of the EOI is to promote initiatives that explain fair housing to the general public and housing providers, and provide the latter with information on how to comply with the requirements of the FHA.

Non-profit organizations are eligible to apply for funding under each or all of these initiatives. To receive FHOI funding, such organizations must have at least two years’ experience in complaint intake and investigation, fair housing testing, and meritorious claims in the three years prior to applying for funding. Eligibility for PEI funding is subject to “certain requirements related to the length and quality of previous fair housing enforcement experience.” Organizations applying for the EOI must also have two years’ experience in the relevant fair housing activities; EOI funds are also potentially available to State and local government agencies.

Residents across North Carolina are currently served by one full-service, statewide FHIP grantee: Legal Aid of North Carolina (LANC). The non-profit organization promotes fair housing choice through its Fair Housing Project, which provides fair housing education and outreach, provides legal representation to those who believe they have experienced discrimination in the state’s housing market, undertakes research concerning fair housing and predatory lending, conducts fair housing testing, and offers continuing legal education courses relating to fair housing law. The Fair Housing Project was established in 2011, and has been a consistent recipient of funding under the FHIP Private Enforcement Initiative since FY2012.

In addition to LANC’s Fair Housing Project, the Elizabeth City State University provides fair housing education and outreach to residents of fourteen rural counties in the northeast of the state. In furtherance of these efforts, the university was granted funding under the FHIP Education and Outreach Initiative for FY2014.

⁶³ Though there are four initiatives included in the FHIP, no funds are currently available through the Administrative Enforcement Initiative.

STATE AGENCIES

The North Carolina Human Relations Commission

The North Carolina Human Relations Commission (NCHRC) is the agency charged with enforcing the provisions of the state Fair Housing Act. The NCHRC accepts complaints from state residents who believe that they have suffered violations of the state fair housing law and, as a participant in HUD's Fair Housing Assistance Program (FHAP), the Federal Fair Housing Act.⁶⁴ Those who believe that they have been subjected to housing discrimination prohibited by state or federal fair housing laws may contact the agency through the following information:

Address:

North Carolina Human Relations Commission
116 West Jones Street, Suite 2109
Raleigh, North Carolina 27699-1318

Telephone: (919) 807-4420

Toll Free: 1 (866) 324-7474

FAX: (919) 807-4435

A printable complaint form is available at <http://www.doa.nc.gov/hrc/fairhousing.aspx>.

PRIVATE ORGANIZATION

The Fair Housing Project of Legal Aid of North Carolina

The Fair Housing Project ("the Project") is the only full-service, statewide fair housing organizations in the state. The Project has been in operation since 2011, and has participated in a number of housing-related civil cases at the state and national level, some of which were profiled in the previous section. In addition to accepting fair housing complaints from state residents, the project also conducts fair housing testing, conducts research into fair housing and predatory lending, and provides fair housing outreach and education to residents and stakeholders throughout the state. Those who believe that they have been subjected to illegal discrimination in the housing market may contact the Project through the following information:

Address:

Fair Housing Project
224 South Dawson Street
Raleigh, North Carolina

Telephone: 1 (855) 797-3247

Email: info@fairhousingnc.org

⁶⁴ The North Carolina Senate, in its version of the 2015 state budget, called for the elimination of the Human Relations Commission and the state Fair Housing Act. Though the Commission was not eliminated in the final version of the budget, passed in early September of 2015, it was designated for Continuation Review. The purpose of this review is to determine whether funding for the funds, agencies, or divisions designated will be continued, reduced, or eliminated. The Human Relations Commission, along with other agencies identified for continuation review, are required to conduct those reviews and present preliminary findings by December 1, 2015. The final reports are due by April 1, 2016.

COMPLAINT PROCESS REVIEW

COMPLAINT PROCESSES FOR FAIR HOUSING AGENCIES

U.S. Department of Housing and Urban Development

The intake stage is the first step in the complaint process. When a complaint is submitted, intake specialists review the information and contact the complainant (the party alleging housing discrimination) in order to gather additional details and determine if the case qualifies as possible housing discrimination. If the discriminatory act alleged in the complaint occurred within the jurisdiction of a substantially equivalent state or local agency under the FHAP, the complaint is referred to that agency, which then has 30 days to address the complaint. If that agency fails to address the complaint within that time period, HUD can take the complaint back.

If HUD determines that it has jurisdiction and accepts the complaint for investigation, it will draft a formal complaint and send it to the complainant to be signed. Once HUD receives the signed complaint, it will notify the respondent (the party alleged to have discriminated against the complainant) within ten days that a complaint has been filed against him or her, and send a copy of the formal complaint to the respondent. Within ten days of receiving the formal complaint, the respondent must respond.

Next, the circumstances of the complaint are investigated through interviews and examination of relevant documents. During this time, the investigator attempts to have the parties rectify the complaint through conciliation. The case is closed if conciliation of the two parties is achieved or if the investigator determines that there was no reasonable cause of discrimination. If conciliation fails, and reasonable cause is found, then either a federal judge or a HUD Administrative Law Judge hears the case and determines damages, if any.⁶⁵ In the event that the federal court judge finds the discrimination alleged in a complaint to have actually occurred, the respondent may be ordered to:

- Compensate for actual damages, including humiliation, pain, and suffering;
- Provide injunctive or other equitable relief to make the housing available;
- Pay the federal government a civil penalty to vindicate the public interest, with a maximum penalty of \$10,000 for a first violation and \$50,000 for an additional violation within seven years; and/or
- Pay reasonable attorneys' fees and costs.⁶⁶

If neither party elects to go to federal court, a HUD Administrative Law Judge will hear the case. Once the judge has decided the case, he or she issues an initial decision. If the judge finds that housing discrimination has occurred, he or she may award a civil penalty of up to \$11,000 to the complainant, along with actual damages, court costs, and attorney's fees. When the initial decision is rendered, any party that is adversely affected by that decision can petition the Secretary of HUD for review within 15 days. The Secretary has 30 days following the

⁶⁵ "HUD's Title VIII Fair Housing Complaint Process." <http://www.hud.gov/offices/fheo/complaint-process.cfm>

⁶⁶ "Fair Housing—It's Your Right." <http://www.hud.gov/offices/fheo/FHLaws/yourrights.cfm>

issuance of the initial decision to affirm, modify, or set aside the decision, or call for further review of the case. If the Secretary does not take any further action on the complaint within 30 days of the initial decision, the decision will be considered final. After that, any aggrieved party must appeal to take up their grievance in the appropriate court of appeals.⁶⁷

The North Carolina Human Relations Commission

As noted previously, HUD has deemed the North Carolina Fair Housing Act to be substantially equivalent to the Federal Fair Housing Act, meaning that the rights, remedies, and procedures enshrined in the state law are similar to those provided at the federal level. For this reason, the complaint process laid out in the state law is also similar to the HUD complaint process described above, though the two differ in certain details. For example, while HUD is required to complete its investigation and determine whether or not discrimination has occurred within 100 days of the filing of the complaint, the HRC must do so within 90 days.

In addition, the state law differs from the provisions set forth in the federal FHA by directing the HRC to attempt to broker a conciliation agreement between complainant and respondent after determining that a complaint has cause. Both federal and state laws allow for the voluntary resolution of complaints before the end of the investigation; however, informal efforts at conciliation end, at the federal level, when the investigation ends. By contrast, a charge of discrimination at the state level is followed by an informal conciliation process, at which stage the complaint may be resolved voluntarily. Generally, it is only if and when the conciliation process fails, or 130 days following the filing of the complaint have passed, that the complaint may proceed to a civil action or administrative hearing under state law.

SUMMARY

North Carolina residents who believe that they have been subjected to illegal discrimination in the housing market may file a complaint with the US Department of Housing and Urban Development (HUD), which has a regional office in Atlanta, Georgia. However, because HUD has deemed the state fair housing law to be substantially equivalent to the Federal Fair Housing Act, HUD will generally refer complaints it receives from North Carolina residents to the North Carolina Human Relations Commission (NCHRC). The NCHRC, which enforces the North Carolina Fair Housing Act, collaborates with HUD under the Fair Housing Assistance Program (FHAP), under which the commission enforces state and federal fair housing laws, receiving reimbursement funding from HUD for its efforts.

In light of the fact that HUD has determined the federal and state Fair Housing Acts to be substantially equivalent, it is not surprising that HUD and the Human Relations Commission follow similar complaint procedures. North Carolina residents who wish to file a fair housing complaint with HUD or the Human Relations Commission may do so within a year of the most recent alleged violation at issue in the complaint. Once a complaint is lodged, HUD is required to complete the investigation within 100 days (the Commission has 90 days), unless it is impracticable to do so. During the investigation, HUD or the Commission will attempt to broker a conciliation agreement between the complainant and respondent (i.e., the person alleged to have committed the violation). If no agreement is reached, HUD or the Commission

⁶⁷ "HUD's Title VIII Fair Housing Complaint Process." <http://www.hud.gov/offices/ftheo/complaint-process.cfm>

will determine whether or not the allegation amounts to a true instance of discrimination, and will issue a charge.

It is at this point that the procedures of HUD and the Human Relations Commission differ slightly. If the Commission determines that there is reasonable cause to believe that discrimination has occurred or will likely occur, it will require the two parties to attempt, where possible, to resolve the matter through conciliation or mediation before proceeding to an administrative hearing or civil action. Though HUD also attempts to resolve fair housing complaints through conciliation, the statutory conciliation process ends, at the federal level, when HUD determines whether or not the complaint has cause. If the HUD issues a charge of discrimination, the matter may proceed to an administrative hearing or civil action, depending on the wishes of the parties involved. The same is true of complaints filed with the Commission if the parties are unable to resolve the matter through conciliation.

Those who are found to have violated the state or Federal Fair Housing Act may be required to pay monetary damages and civil penalties, and to undertake a number of measures designed to prevent similar violations in the future, including training and the adoption of anti-discrimination policies.

The North Carolina Senate, in its version of the 2015 state budget, called for the elimination of the Human Relations Commission and the state Fair Housing Act. Though the Commission was not eliminated in the final version of the budget, passed in early September of 2015, it was designated for Continuation Review. The purpose of this review is to determine whether funding for the funds, agencies, or divisions designated will be continued, reduced, or eliminated. The Human Relations Commission, along with other agencies identified for continuation review, are required to conduct those reviews and present preliminary findings by December 1, 2015. The final reports from the Continuation Review are due by April 1, 2016.

In addition to the federal and state governmental agencies discussed above, North Carolina residents are served by the Fair Housing Project of Legal Aid NC. In addition to providing complaint intake and fair housing testing, the organization also conducts research into fair housing and predatory lending in the state and provides outreach and education to residents and stakeholders throughout the state.

SECTION V. FAIR HOUSING IN THE PRIVATE SECTOR

As part of the AI process, the U.S. Department of Housing and Urban Development (HUD) suggests that the analysis focus on possible housing discrimination issues in both the private and public sectors. While an examination of housing factors in the State of North Carolina's public sector is presented in **Section VI**, this section focuses on research regarding the state's private sector, including the mortgage lending market, the real estate market, the rental market, and other private sector housing industries.

LENDING ANALYSIS

HOME MORTGAGE DISCLOSURE ACT

Since the 1970s, the federal government has enacted several laws aimed at promoting fair lending practices in the banking and financial services industries. A brief description of selected federal laws aimed at promoting fair lending follows:

- The 1968 *Fair Housing Act* prohibits discrimination in housing based on race, color, religion, and national origin. Later amendments added sex, familial status, and disability. Under the Fair Housing Act, it is illegal to discriminate against any of the protected classes in the following types of residential real estate transactions: making loans to buy, build, or repair a dwelling; selling, brokering, or appraising residential real estate; and selling or renting a dwelling.
- The *Equal Credit Opportunity Act* was passed in 1974 and prohibits discrimination in lending based on race, color, religion, national origin, sex, marital status, age, receipt of public assistance, and the exercise of any right under the Consumer Credit Protection Act.
- The *Community Reinvestment Act* was enacted in 1977 and requires each federal financial supervisory agency to encourage financial institutions to help meet the credit needs of the entire community, including low- and moderate-income neighborhoods.
- Under the *Home Mortgage Disclosure Act (HMDA)*, enacted in 1975 and later amended, financial institutions are required to publicly disclose the race, sex, ethnicity, and household income of mortgage applicants by the Census tract in which the loan is proposed as well as outcome of the loan application.⁶⁸ The analysis presented in this section is based on data from the HMDA data system.

The HMDA requires both depository and non-depository lenders to collect and publicly disclose information about housing-related applications and loans.⁶⁹ Both types of lending institutions must meet the following set of reporting criteria:

⁶⁸ *Closing the Gap: A Guide to Equal Opportunity Lending*, The Federal Reserve Bank of Boston, April 1993. <http://www.bos.frb.org/commdev/closing-the-gap/closingt.pdf>

⁶⁹ Data are considered "raw" because they contain entry errors and incomplete loan applications. Starting in 2004, the HMDA data made significant changes in reporting, particularly regarding ethnicity data, loan interest rates, and the multi-family loan applications.

1. The institution must be a bank, credit union, or savings association;
2. The total assets must exceed the coverage threshold;⁷⁰
3. The institution must have had an office in a Metropolitan Statistical Area (MSA);
4. The institution must have originated at least one home purchase loan or refinancing of a home purchase loan secured by a first lien on a one- to four-family dwelling;
5. The institution must be federally insured or regulated; and
6. The mortgage loan must have been insured, guaranteed, or supplemented by a federal agency or intended for sale to the Federal National Mortgage Association (FNMA or Fannie Mae) or the Federal Home Loan Mortgage Corporation (FHLMC or Freddie Mac). These agencies purchase mortgages from lenders and repackage them as securities for investors, making more funds available for lenders to make new loans.

For other institutions, including non-depository institutions, additional reporting criteria are as follows:

1. The institution must be a for-profit organization;
2. The institution's home purchase loan originations must equal or exceed 10 percent of the institution's total loan originations, or more than \$25 million;
3. The institution must have had a home or branch office in an MSA or have received applications for, originated, or purchased five or more home purchase loans, home improvement loans, or refinancing mortgages on property located in an MSA in the preceding calendar year; and
4. The institution must have assets exceeding \$10 million or have originated 100 or more home purchases in the preceding calendar year.

HMDA data represent most mortgage lending activity and are thus the most comprehensive collection of information available regarding home purchase originations, home remodel loan originations, and refinancing. The Federal Financial Institutions Examination Council (FFIEC) makes HMDA data available on its website. While HMDA data are available for more years than are presented in the following pages, modifications were made in 2004 for documenting loan applicants' race and ethnicity, so data are most easily compared after that point.

Home Purchase Loans

From 2004 through 2013, banks and other lending institutions handled over 3.7 million home loans and loan applications from residents of the state's non-entitlement areas. As shown in Table V.1 on the following page, around 1.4 million of those loans were home purchase loans, or around 37.3 percent. Of the remainder, most were refinance loans, though approximately five percent were home improvement loans.

⁷⁰ Each December, the Federal Reserve announces the threshold for the following year. The asset threshold may change from year to year based on changes in the Consumer Price Index for Urban Wage Earners and Clerical Workers.

Table V.1
Purpose of Loan by Year
 Non-Entitlement Areas of North Carolina
 2004–2013 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Home Purchase	179,855	214,322	215,620	175,579	113,494	93,002	90,913	90,668	97,279	112,554	1,383,286
Home Improvement	25,034	31,961	31,518	31,530	23,597	12,259	10,164	10,661	14,077	15,560	206,361
Refinancing	246,267	255,295	238,043	228,771	191,946	238,399	184,179	167,508	197,932	174,826	2,123,166
Total	451,156	501,578	485,181	435,880	329,037	343,660	285,256	268,837	309,288	302,940	3,712,813

For the purposes of the current study, the following analysis will focus on home purchase loan applications, specifically on loans intended to finance the purchase of homes in which the loan applicants planned to live. These “owner-occupied” home purchase loans provide the best index of an applicant’s ability to choose where he or she lives. As shown in Table V.2 below, they accounted for over 1.1 million applications, or 84.2 percent of all home purchase loan applications, from 2004 through 2013.

Table V.2
Occupancy Status for Home Purchase Loan Applications
 Non-Entitlement Areas of North Carolina
 2004–2013 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Owner-Occupied	150,461	175,401	175,267	144,832	95,274	81,202	79,082	78,816	84,649	99,319	1,164,303
Not Owner-Occupied	28,463	37,806	39,082	29,798	17,528	11,656	11,718	11,680	12,509	13,123	213,363
Not Applicable	931	1,115	1,271	949	692	144	113	172	121	112	5,620
Total	179,855	214,322	215,620	175,579	113,494	93,002	90,913	90,668	97,279	112,554	1,383,286

Denial Rates

After the owner-occupied home purchase loan application is submitted, the applicant receives one of the following status designations:

- “Originated,” which indicates that the loan was made by the lending institution;
- “Approved but not accepted,” which notes loans approved by the lender but not accepted by the applicant;
- “Application denied by financial institution,” which defines a situation wherein the loan application failed;
- “Application withdrawn by applicant,” which means that the applicant closed the application process;
- “File closed for incompleteness” which indicates the loan application process was closed by the institution due to incomplete information; or
- “Loan purchased by the institution,” which means that the previously originated loan was purchased on the secondary market.

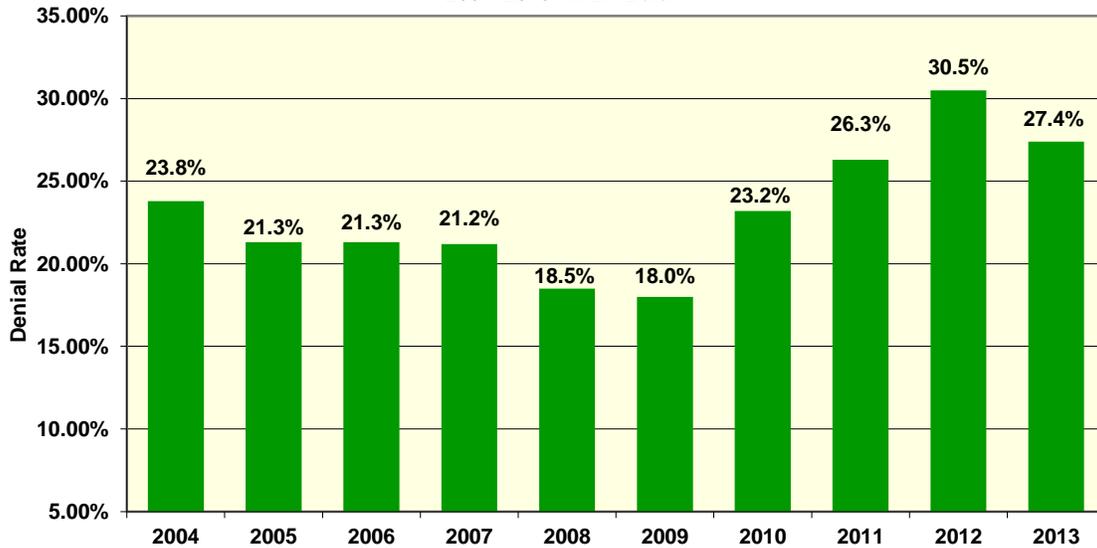
These outcomes were used to determine denial rates presented in the following section. Factors in denial of home purchase loans, such as credit scores or down payment amounts, are not reported in every report submitted through the HMDA, so the reasons for specific loan denials are often unknown. However, with that caveat in mind, the ratio of loan originations to loan denials can be seen as an indicator of the overall success or failure of home purchase loan applicants. Around 569,000 loan applications were approved in the state’s non-entitlement areas from 2004 through 2013. At the same time, approximately 168,000 were denied, as shown in Table V.3 on the following page, for a denial rate of 22.8 percent.

Table V.3
Loan Applications by Action Taken
 Non-Entitlement Areas of North Carolina
 2004–2013 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Loan Originated	73,910	88,540	88,893	73,869	49,789	40,712	37,488	34,802	36,487	44,619	569,109
Application Approved but not Accepted	9,493	10,281	11,598	8,626	3,929	2,177	3,220	5,667	5,273	6,840	67,104
Application Denied	23,131	23,911	24,012	19,857	11,297	8,929	11,297	12,439	16,039	16,876	167,788
Application Withdrawn by Applicant	9,017	12,055	9,907	8,356	7,214	5,738	5,677	5,136	5,108	6,519	74,727
File Closed for Incompleteness	2,055	2,409	2,543	2,375	1,653	1,467	1,394	1,289	1,211	1,218	17,614
Loan Purchased by the Institution	32,855	38,074	38,252	31,700	21,366	22,071	19,982	19,470	20,502	23,234	267,506
Preapproval Request Denied	0	130	57	45	26	108	21	13	18	8	426
Preapproval Approved but not Accepted	0	1	5	4	0	0	3	0	11	5	29
Total	150,461	175,401	175,267	144,832	95,274	81,202	79,082	78,816	84,649	99,319	1,164,303
Denial Rate	23.8%	21.3%	21.3%	21.2%	18.5%	18.0%	23.2%	26.3%	30.5%	27.4%	22.8%

Yearly denial rates are presented in Diagram V.1 below: as shown, after a steady decline in denial rates from 2004 through 2009, denial rates began to climb very quickly thereafter. In 2012, over 30 percent of home purchase loan applications were denied.

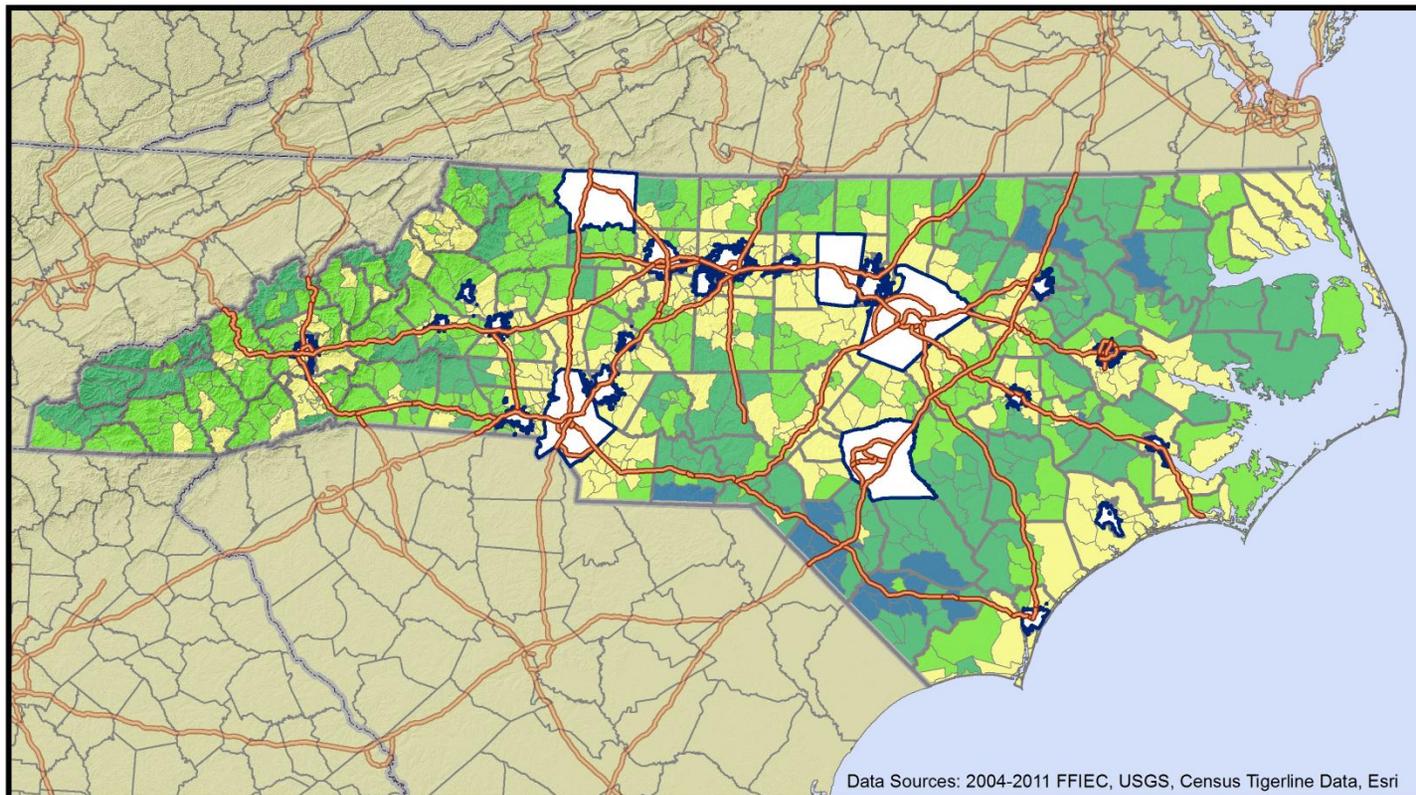
Diagram V.1
Denial Rates by Year
 Non-Entitlement Areas of North Carolina
 2004–2013 HMDA Data



In addition to showing marked variation by year, denial rates also tended to vary according to the geographic location of the housing unit whose purchase the loan was designed to finance. As shown in Map V.1 on the following page, denial rates from 2004 through 2011 tended to be relatively low in Census tracts surrounding the state’s non-entitlement areas, and relatively high in more rural Census tracts, notably in the inner coastal plain. Denial rates also tended to be relatively high in western Census tracts bordering Tennessee over that time period.

The same overall pattern was observed in the years after 2011, as shown in Map V.2 on page 82. As before, the highest denial rates were generally observed in Census tracts in the inner coastal plain.

Map V.1
Denial Rates by Census Tract, 2004-2011
 Non-Entitlement Areas of North Carolina
 2004-2011 HMDA Data, Mapped by Year-2000 Census Tract Boundaries



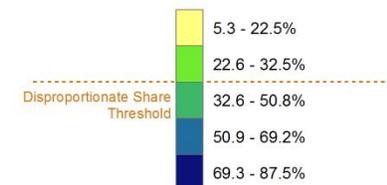
Legend

2004-2011 Overall Denial Rates

2004-2011 Denial rates for all applicants in non-entitlement areas of North Carolina = 22.5%
 Disproportionate share threshold* = 32.5%

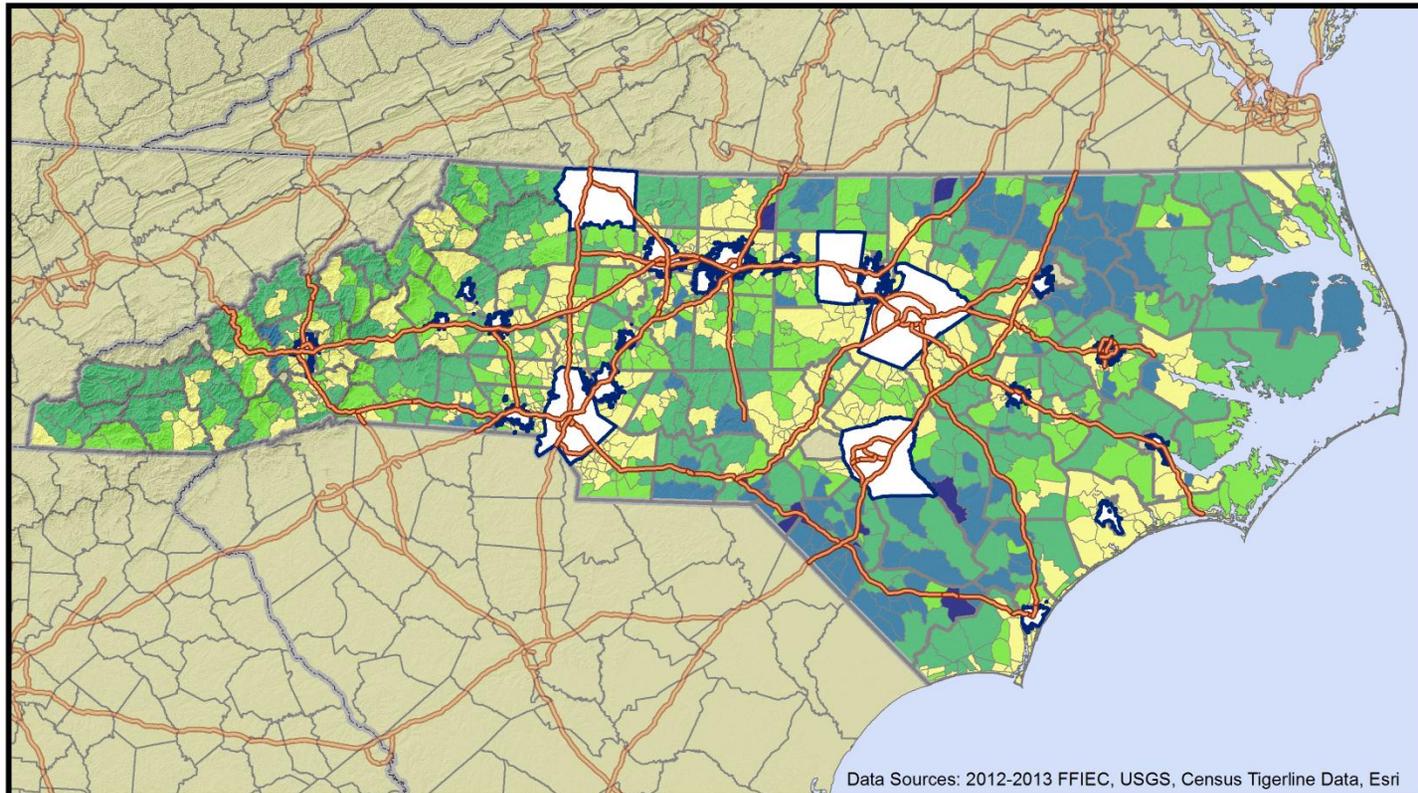
-  Entitlement Boundaries
-  County Boundaries
-  State Boundaries

Denial Rates



*The disproportionate share threshold is ten percentage points higher than the overall average.

Map V.2
Denial Rates by Census Tract, 2012-2013
 Non-Entitlement Areas of North Carolina
 2012-2013 HMDA Data, Mapped by Year-2010 Census Tract Boundaries



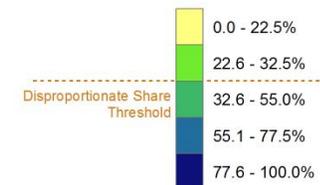
Legend

2012-2013 Overall Denial Rates

2004-2013 Denial rates for all applicants in non-entitlement areas of North Carolina = 22.5%
 Disproportionate share threshold* = 32.5%

-  Entitlement Boundaries
-  County Boundaries
-  State Boundaries

Denial Rates



*The disproportionate share threshold is ten percentage points higher than the overall average.

Similarly, denial rates varied markedly according to whether the loan applicant was male or female. As shown in Table V.4 below, an average of 27.5 percent of loan applications from female non-entitlement residents were denied from 2004 through 2013, compared to a denial rate of 19.9 percent for male applicants. There was a difference of 7.6 percentage points between the two on average, though this gap was wider in some years than in others: In 2004, the denial rate for female applicants was 7.2 percentage points higher than that of male applicants. By 2009, that gap had narrowed to 4.5 percentage points. However, the following three years saw a considerable widening of the distance between males and females in terms of denial rates, and by 2012, the denial rate for female applicants was 13.2 percentage points higher than for male applicants.

Table V.4
Denial Rates by Gender of Applicant
Non-Entitlement Areas of North Carolina
2004–2013 HMDA Data

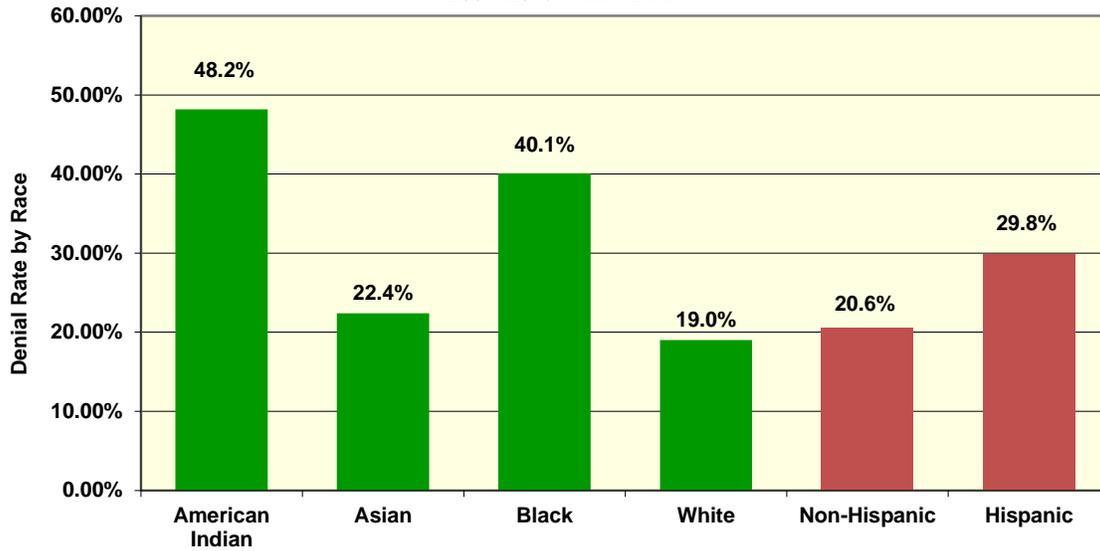
Year	Male	Female	Not Available	Not Applicable	Average
2004	21.3%	28.5%	34.1%	11.6%	23.8%
2005	18.8%	25.6%	31.5%	10.7%	21.3%
2006	18.7%	25.6%	30.9%	8.7%	21.3%
2007	19.0%	25.0%	28.6%	14.7%	21.2%
2008	16.5%	21.5%	28.9%	34.5%	18.5%
2009	16.1%	20.6%	29.0%	11.1%	18.0%
2010	19.8%	27.7%	40.1%	22.2%	23.2%
2011	21.9%	32.9%	43.8%	38.5%	26.3%
2012	25.7%	38.9%	45.0%	18.2%	30.5%
2013	23.5%	33.6%	44.3%	8.3%	27.4%
Average	19.9%	27.5%	34.4%	16.8%	22.8%

Denial rates differed considerably according to the race and ethnicity of the applicants. As shown in Table V.5 below, American Indian applicants were the most likely to be denied, as gauged by the share of applications from a given racial or ethnic group that ended in denials. In the case of American Indian applicants, that share was 48.2 percent. Over 40 percent of loan applications from black applicants were denied, well above the overall average of 22.8 percent for the ten-year period. By contrast, the denial rate for white applicants, at 19 percent, was below average, as was the denial rate for non-Hispanic applicants of all races. The denial rate for Hispanic applicants, on the other hand, was 29.8 percent, or around nine percentage points above average. Average denial rates over the ten-year period are presented in Diagram V.2 on the following page.

Table V.5
Denial Rates by Race/Ethnicity of Applicant
Non-Entitlement Areas of North Carolina
2004–2013 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Average
American Indian	51.2%	46.4%	41.7%	36.4%	38.5%	34.2%	49.3%	56.2%	63.3%	57.6%	48.2%
Asian	26.4%	23.3%	20.6%	23.2%	21.3%	18.0%	24.6%	20.7%	23.6%	20.3%	22.4%
Black	40.7%	35.4%	37.4%	37.5%	29.3%	28.0%	37.0%	47.5%	59.6%	53.9%	40.1%
White	20.1%	17.9%	17.7%	17.9%	15.9%	15.9%	19.5%	21.3%	24.5%	22.2%	19.0%
Not Available	30.5%	29.3%	28.1%	26.7%	27.4%	25.6%	35.0%	38.8%	41.6%	39.5%	30.9%
Not Applicable	25.1%	14.8%	10.3%	5.9%	33.3%	05.6%	022.2%	64.7%	11.1%	8.3%	23.2%
Average	23.8%	21.3%	21.3%	21.2%	18.5%	18.0%	23.2%	26.3%	30.5%	27.4%	22.8%
Non-Hispanic	23.6%	19.8%	20.1%	20.3%	17.2%	17.1%	20.3%	21.6%	24.6%	22.0%	20.6%
Hispanic	35.5%	31.3%	25.8%	26.7%	25.3%	24.1%	29.0%	32.2%	36.1%	33.6%	29.8%

Diagram V.2
Denial Rates by Race
 Non-Entitlement Areas of North Carolina
 2004–2013 HMDA Data



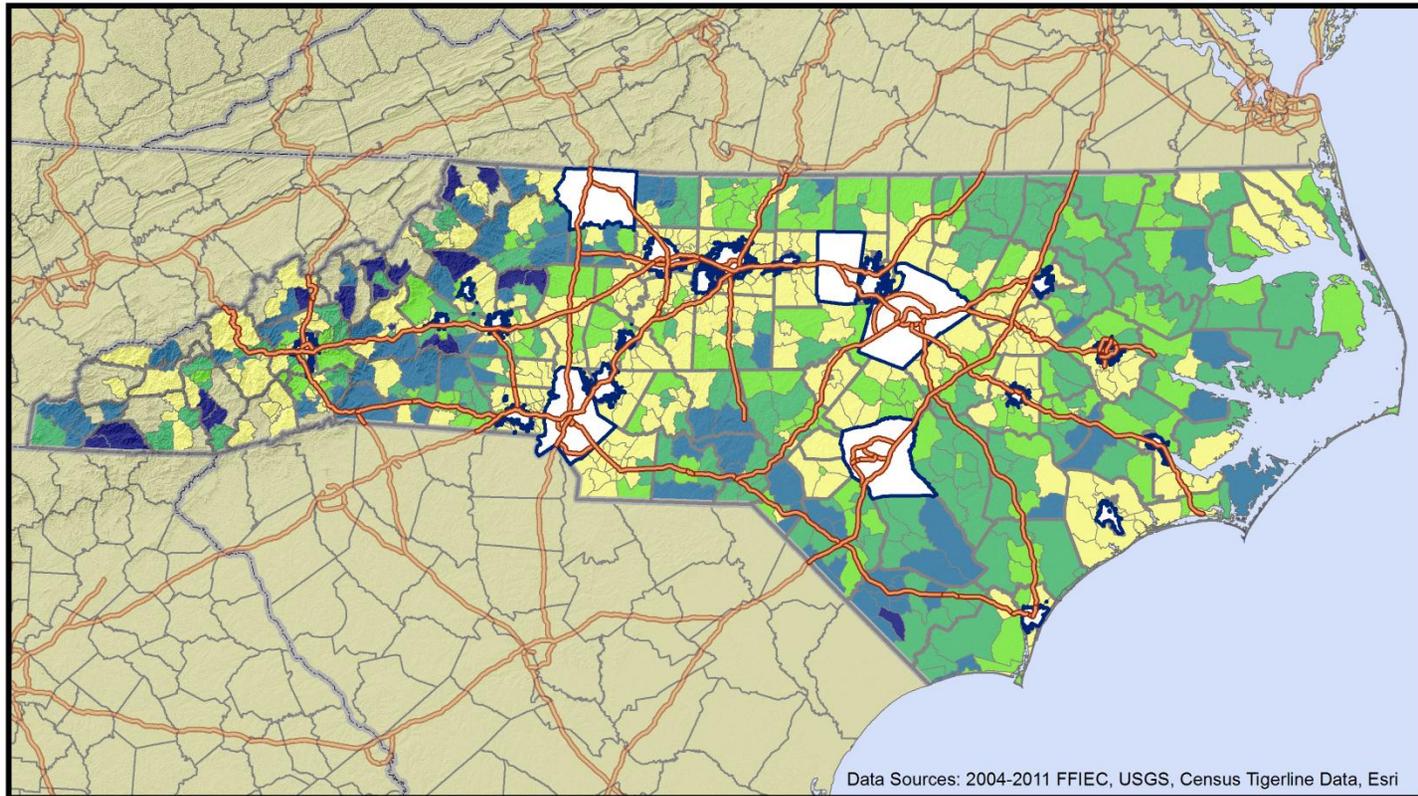
Lending institutions gave a number of reasons for loan denials, as shown in Table V.6 below. Credit history was the most common principal reason for loan denials in the state’s non-entitlement areas, figuring in over thirty percent of loan denials over the 2004-2013 period. The next most common reason given, excluding applications with missing information, was debt-to-income ratio. The relative importance of both of these factors varied over the ten-year period: The share of applications denied primarily due to credit history, 37.4 percent in 2004, had fallen to 17.2 percent by 2013. Similarly, though the share of denied applications listing debt-to-income ratio as a primary reason rose from around ten percent in 2004 to just over twenty percent in 2009, by 2013 the share of loans denied due to debt-to-income ratio had fallen back below twelve percent.

Table V.6
Loan Applications by Reason for Denial
 Non-Entitlement Areas of North Carolina
 2004–2013 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Debt-to-Income Ratio	2,314	2,172	2,464	2,551	2,030	1,808	1,885	1,779	1,998	1,983	20,984
Employment History	279	291	372	351	228	213	200	174	199	188	2,495
Credit History	8,649	8,727	8,417	7,414	3,477	2,866	3,219	2,927	3,022	2,900	51,618
Collateral	1,088	1,488	1,731	1,501	1,029	984	1,033	930	947	1,238	11,969
Insufficient Cash	669	525	523	589	375	227	254	198	231	334	3,925
Unverifiable Information	456	552	678	599	358	241	303	202	208	294	3,891
Credit Application Incomplete	762	926	939	940	509	362	338	364	579	642	6,361
Mortgage Insurance Denied	11	10	7	16	31	30	23	14	13	5	160
Other	3,117	4,143	3,589	1,533	735	666	628	665	713	586	16,375
Missing	5,786	5,077	5,292	4,363	2,525	1,532	3,414	5,186	8,129	8,706	50,010
Total	23,131	23,911	24,012	19,857	11,297	8,929	11,297	12,439	16,039	16,876	167,788

As was the case with loan applicants overall, black loan applicants tended to experience higher rates of loan denials in rural Census tracts, and lower denial rates around the state’s entitlement areas, as shown in Map V.3 on the following page. Though the highest denial rates were observed in the west of the state, Census tracts with high rates of home loan denials to black applicants also appeared throughout the inner coastal plain.

Map V.3
Denial Rates for Black Applicants by Census Tract, 2004-2011
 Non-Entitlement Areas of North Carolina
 2004-2011 HMDA Data, Mapped by Year-2000 Census Tract Boundaries



Data Sources: 2004-2011 FFIEC, USGS, Census Tigerline Data, Esri

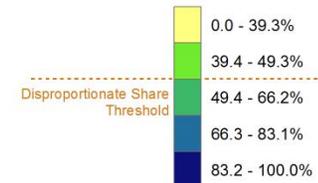
Legend

2004-2011 Black Denial Rates

2004-2011 Denial rates for black applicants in non-entitlement areas of North Carolina = 39.3%
 Disproportionate share threshold* = 49.3%

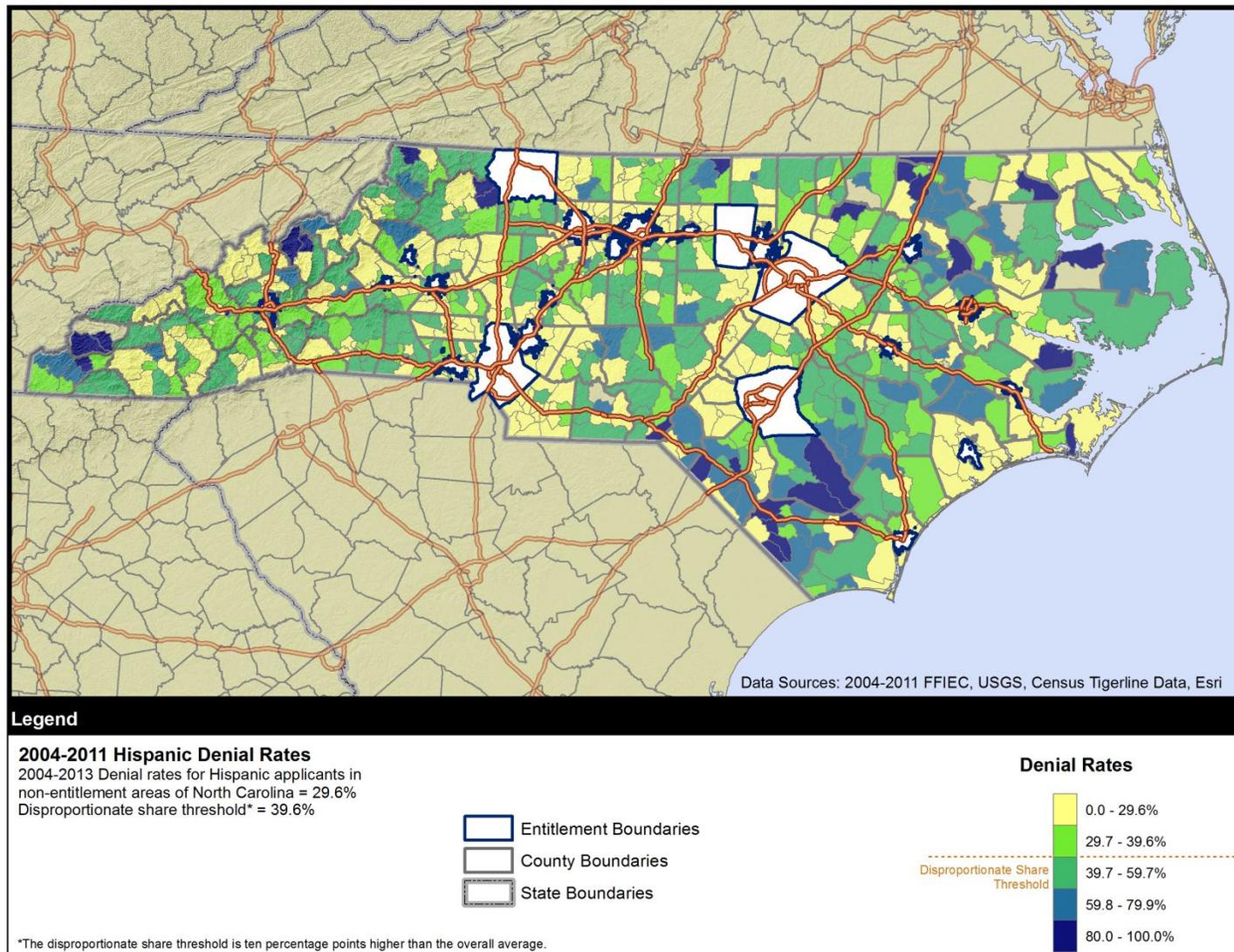
-  Entitlement Boundaries
-  County Boundaries
-  State Boundaries

Denial Rates



*The disproportionate share threshold is ten percentage points higher than the overall average.

Map V.4
Denial Rates for Hispanic Applicants by Census Tract, 2004-2011
 Non-Entitlement Areas of North Carolina
 2004-2011 HMDA Data, Mapped by Year-2000 Census Tract Boundaries



As with black applicants and applicants of all races and ethnicities, Hispanic loan applicants tended to have an easier time securing loans to purchase homes in Census tracts that lay closer to the state's entitlement jurisdictions. As shown in Map V.4 on the previous page, those who applied for loans in rural Census tracts throughout the state were more likely to be turned down.

As one might expect, given the overall prominence of debt-to-income ratios as a factor among loan denials, denial rates tended to fall as the income of the applicant rose. Table V.7 below provides a detailed portrait of denial rates by income category: as shown, applicants who were earning at or below \$15,000 per year were denied 72.3 percent of the time on average from 2004 through 2013. Denial rates fell progressively with entry into higher income brackets, to the point that the denial rate for applicants earning more than \$75,000 per year was about half of the overall average of 22.5 percent.

Table V.7
Denial Rates by Income of Applicant
Non-Entitlement Areas of North Carolina
2004–2013 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
\$15,000 or Below	66.6%	73.5%	64.5%	68.4%	61.6%	64.1%	74.3%	79.4%	83.9%	86.2%	72.3%
\$15,001–\$30,000	43.3%	41.8%	43.4%	42.7%	34.8%	31.5%	42.7%	48.4%	55.8%	53.6%	43.9%
\$30,001–\$45,000	25.9%	24.1%	25.1%	24.1%	21.1%	18.6%	24.0%	28.8%	34.1%	31.6%	25.5%
\$45,001–\$60,000	19.1%	17.5%	19.0%	19.1%	16.4%	14.7%	18.1%	22.4%	26.6%	24.8%	19.4%
\$60,001–\$75,000	13.4%	12.9%	15.2%	15.0%	13.5%	12.8%	15.7%	16.8%	19.8%	19.0%	15.1%
Above \$75,000	10.4%	10.5%	11.5%	11.9%	11.5%	11.7%	12.6%	12.7%	13.7%	13.0%	11.8%
Data Missing	22.1%	14.4%	15.6%	20.8%	46.0%	55.8%	51.1%	36.0%	41.6%	33.7%	23.8%
Total	23.8%	21.3%	21.3%	21.2%	18.5%	18.0%	23.2%	26.3%	30.5%	27.4%	22.8%

In spite of the effect that rising incomes had on the likelihood that an applicant would be denied a loan, denial rates were still observed to vary considerably by race and ethnicity even when income was taken into account. As shown in Table V.8 below, the denial rate for black applicants earning \$60,000 to \$75,000 per year was, at 26 percent, twice the denial rate of white applicants who were similarly situated with respect to income, while American Indian applicants in that income range were denied 36.4 percent of the time on average. Similarly, the denial rate for Hispanic applicants in the same income range was 19.4 percent, more than five percentage points higher than the denial rate for non-Hispanic applicants in that income range.

Table V.8
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
Non-Entitlement Areas of North Carolina
2004–2013 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	83.6%	64.0%	47.6%	37.0%	36.4%	27.0%	43.8%	48.2%
Asian	66.7%	41.6%	27.4%	19.7%	13.8%	13.6%	23.5%	22.4%
Black	86.4%	61.0%	39.3%	30.5%	26.0%	23.4%	40.3%	40.1%
White	67.1%	37.9%	21.7%	16.7%	13.0%	10.1%	17.3%	19.0%
Not Available	74.6%	55.9%	34.9%	27.2%	21.4%	17.1%	45.8%	30.9%
Not Applicable	.0%	29.8%	35.0%	18.2%	23.8%	7.5%	17.9%	23.2%
Average	72.3%	43.9%	25.5%	19.4%	15.1%	11.8%	23.8%	22.8%
Non-Hispanic	69.8%	41.0%	23.2%	17.7%	13.9%	10.9%	18.8%	20.6%
Hispanic	72.0%	42.7%	29.7%	22.8%	19.4%	17.4%	25.5%	29.8%

Predatory Style Lending

In addition to modifications implemented in 2004 to correctly document loan applicants’ race and ethnicity, the HMDA reporting requirements were changed in response to the Predatory Lending Consumer Protection Act of 2002 as well as the Home Owner Equity Protection Act (HOEPA). Consequently, loan originations are now flagged in the data system for three additional attributes:

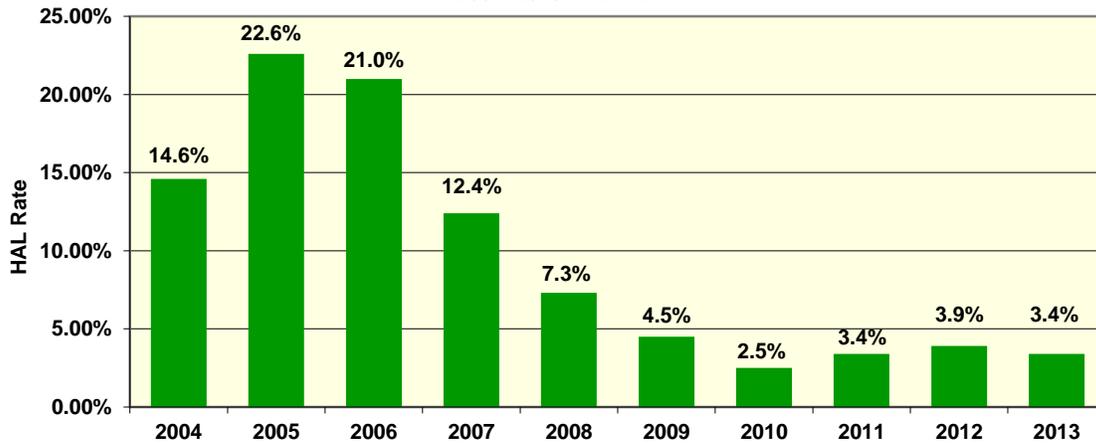
1. If they are HOEPA loans;⁷¹
2. Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans); and
3. Presence of high annual percentage rate loans (HALs), defined as more than three percentage points higher than comparable treasury rates for home purchase loans, or five percentage points higher for refinance loans.⁷²

As shown in Table V.9 below, such loans accounted for 12.1 percent of home purchase loans issued in the state’s non-entitlement areas, or around 69,000 loans. Yearly HAL rates, which topped 22 percent in 2005, have fallen considerably since that time, as shown in Diagram V.3 below. These high-cost loans have accounted for less than five percent of loans overall since 2009.

Table V.9
Originated Owner-Occupied Loans by HAL Status
 Non-Entitlement Areas of North Carolina
 2004–2013 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Other	63,103	68,553	70,236	64,707	46,157	38,893	36,537	33,621	35,064	43,111	499,982
HAL	10,807	19,987	18,657	9,162	3,632	1,819	951	1,181	1,423	1,508	69,127
Total	73,910	88,540	88,893	73,869	49,789	40,712	37,488	34,802	36,487	44,619	569,109
Percent HAL	14.6%	22.6%	21.0%	12.4%	7.3%	4.5%	2.5%	3.4%	3.9%	3.4%	12.1%

Diagram V.3
HAL Rates by Year
 Non-Entitlement Areas of North Carolina
 2004–2013 HMDA Data



⁷¹ Loans are subject to the HOEPA if they impose rates or fees above a certain threshold set by the Federal Reserve Board. “HMDA Glossary.” <http://www.ffiec.gov/hmda/glossary.htm#H>

⁷² 12 CFR Part 203, http://www.ffiec.gov/hmda/pdf/regc_020702.pdf

The geographic distribution of HALs throughout the state’s non-entitlement areas followed a pattern that was similar to the distribution of denial rates: as shown in Map V.5 on the following page, applicants were less likely to be issued a high-cost HAL in Census tracts surrounding the state’s non-entitlement areas from 2004 through 2011, and more likely to be issued such a loan in rural Census tracts, especially in Census tracts in the inner coastal plains and along the western border.

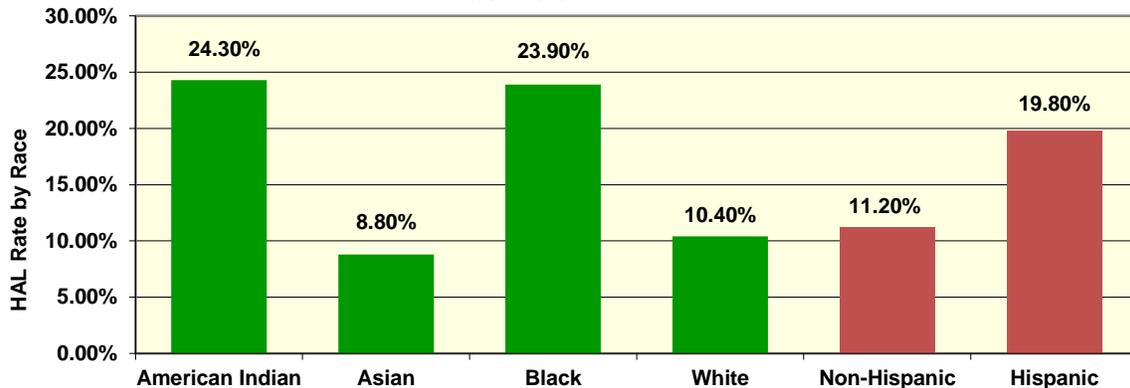
Historically low overall rates of predatory-style lending since 2005 have meant that fewer Census tracts after 2011 have had the high rates of HALs observed during the previous period. As shown in Map V.6 on page 91, there were a number of Census tracts along the southern border with high rates of predatory style home lending and a handful of tracts to the northeast of Rocky Mount, where more than a fifth of home purchase loans issued consisted of high-cost HALs.

As had been the case with loan denial rates, the likelihood that an applicant would be issued a HAL varied by the race and ethnicity of the applicant. Table V.10 below presents HAL rates for members of each race and ethnicity, demonstrating that American Indian borrowers were about twice as likely to receive a HAL as borrowers in general, and the same was true of black borrowers. At the same time, HAL rates for Hispanic borrowers were close to twice the rate at which these high-cost loans were issued to non-Hispanic borrowers. The differences in HAL rates by race and ethnicity are presented in Diagram V.4 below.

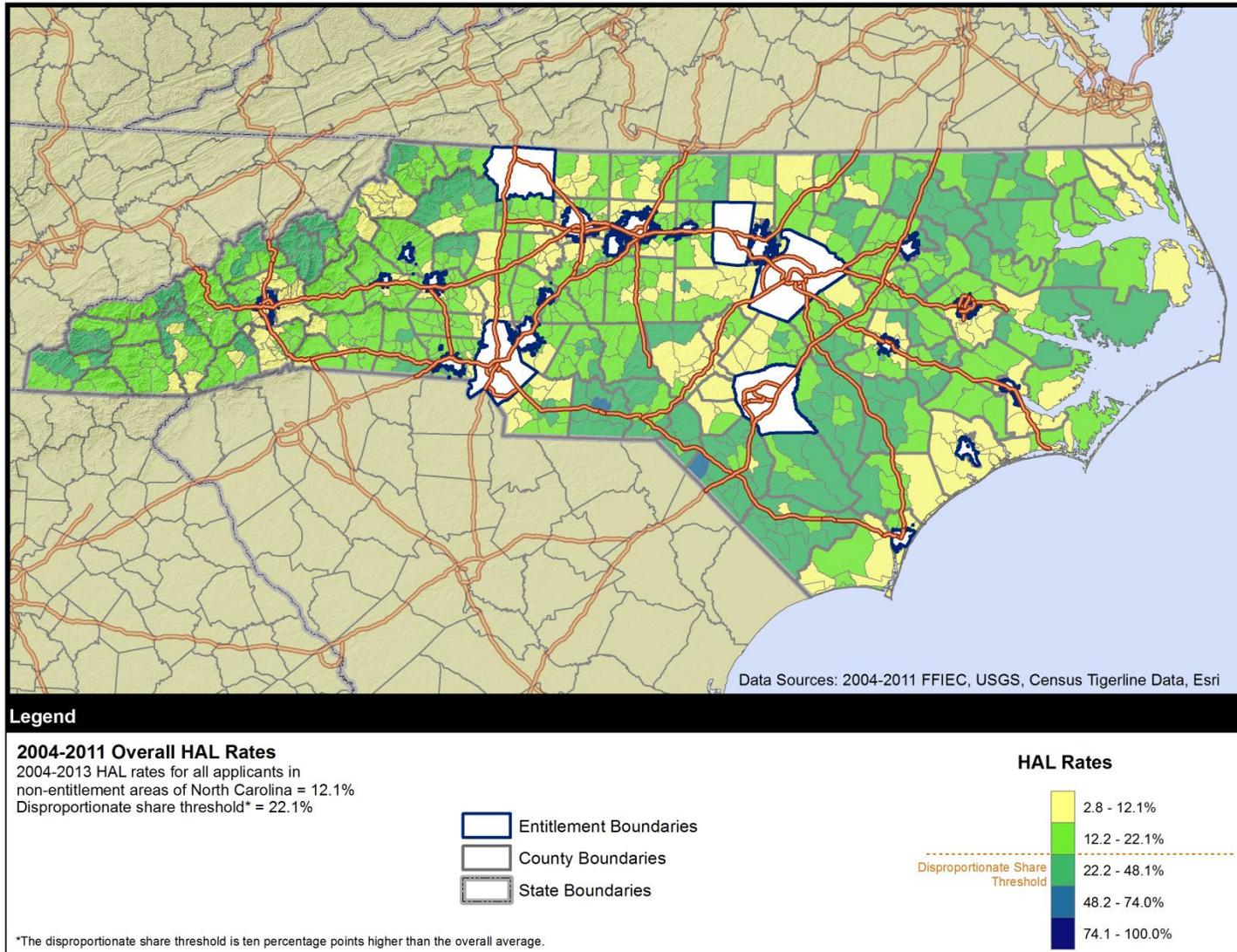
Table V.10
Rate of HALs Originated by Race/Ethnicity of Borrower
 Non-Entitlement Areas of North Carolina
 2004–2013 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Average
American Indian	28.7%	34.2%	27.7%	24.8%	20.5%	17.2%	14.1%	14.8%	20.9%	22.0%	24.3%
Asian	12.1%	18.9%	15.9%	9.2%	5.1%	3.4%	.9%	.9%	.7%	1.2%	8.8%
Black	30.1%	43.8%	39.2%	21.1%	10.2%	5.4%	4.9%	8.7%	11.3%	8.9%	23.9%
White	12.5%	19.0%	17.9%	11.1%	7.0%	4.5%	2.2%	2.7%	3.1%	2.7%	10.4%
Not Available	17.5%	33.1%	30.4%	14.8%	6.6%	2.4%	2.7%	4.3%	4.9%	4.9%	17.0%
Not Applicable	12.3%	.0%	.0%	6.3%	.0%	5.9%	.0%	.0%	.0%	.0%	8.5%
Average	14.6%	22.6%	21.0%	12.4%	7.3%	4.5%	2.5%	3.4%	3.9%	3.4%	12.1%
Non-Hispanic	14.9%	21.2%	19.7%	11.8%	7.0%	4.4%	1.9%	2.0%	2.4%	1.9%	11.2%
Hispanic	21.7%	31.9%	33.3%	21.0%	13.7%	8.8%	4.6%	4.2%	9.1%	5.3%	19.8%

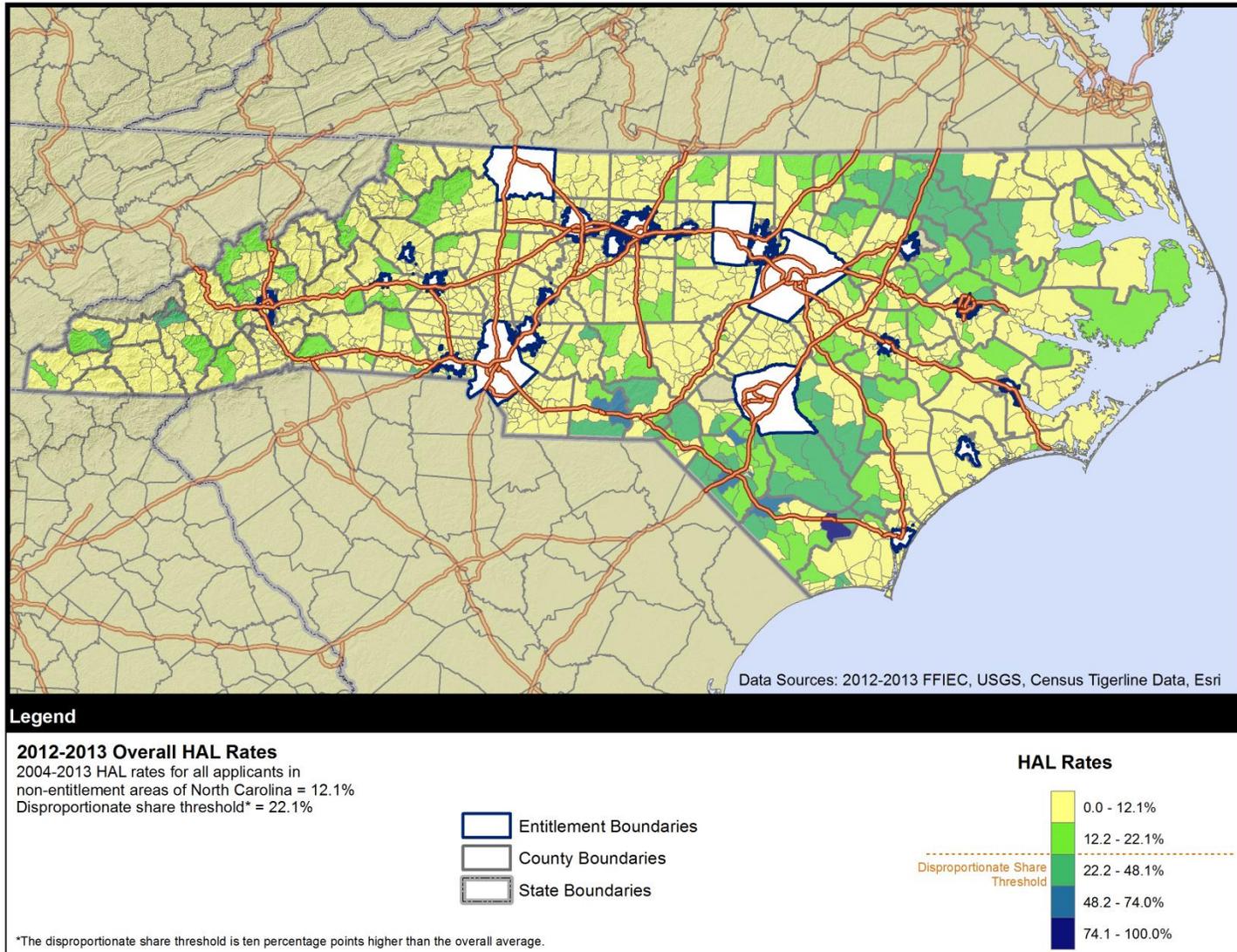
Diagram V.4
HAL Rates by Race
 Non-Entitlement Areas of North Carolina
 2004–2013 HMDA Data



Map V.5
Rate of HALs by Census Tract, 2004-2011
 Non-Entitlement Areas of North Carolina
 2004-2011 HMDA Data, Mapped by Year-2000 Census Tract Boundaries



Map V.6
Rate of HALs by Census Tract, 2012-2013
 Non-Entitlement Areas of North Carolina
 2012-2013 HMDA Data, Mapped by Year-2010 Census Tract Boundaries

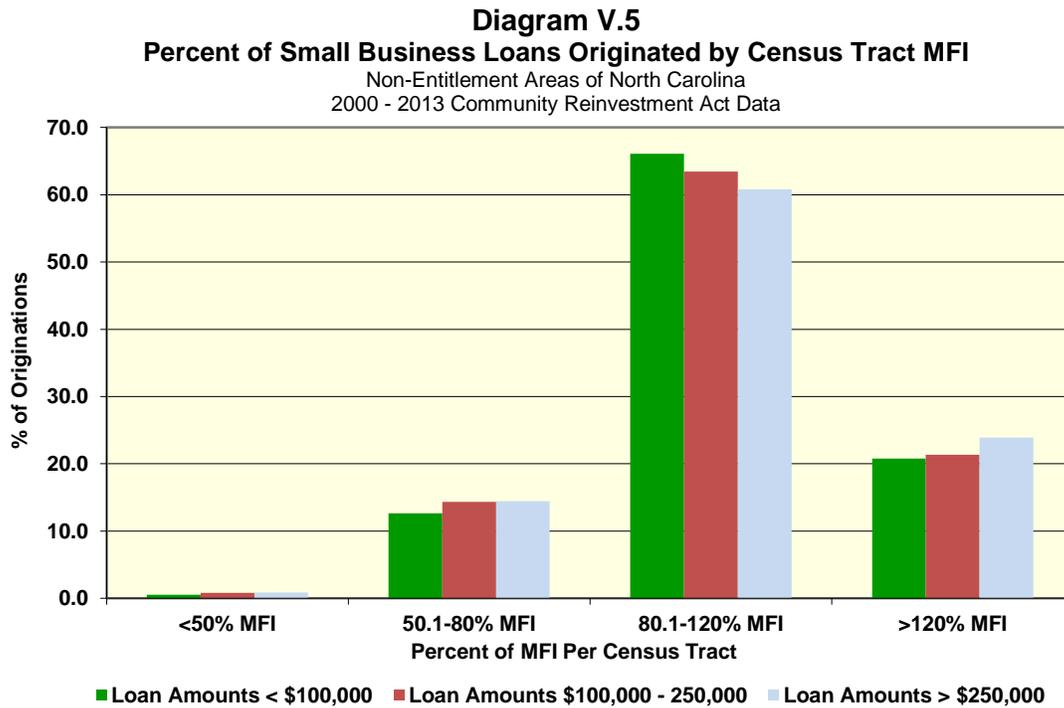


Trends in predatory-style lending for black borrowers also tended to mirror trends in denial rates for black applicants from 2004 through 2011: as shown in Map V.7 on the following page, denial rates for black applicants were relatively low in more populous Census tracts that surrounded entitlement jurisdictions, and relatively high in many rural Census tracts. A similar pattern was observed in HAL rates for Hispanic applicants over the same time period, as shown in Map V.8 on page 94.

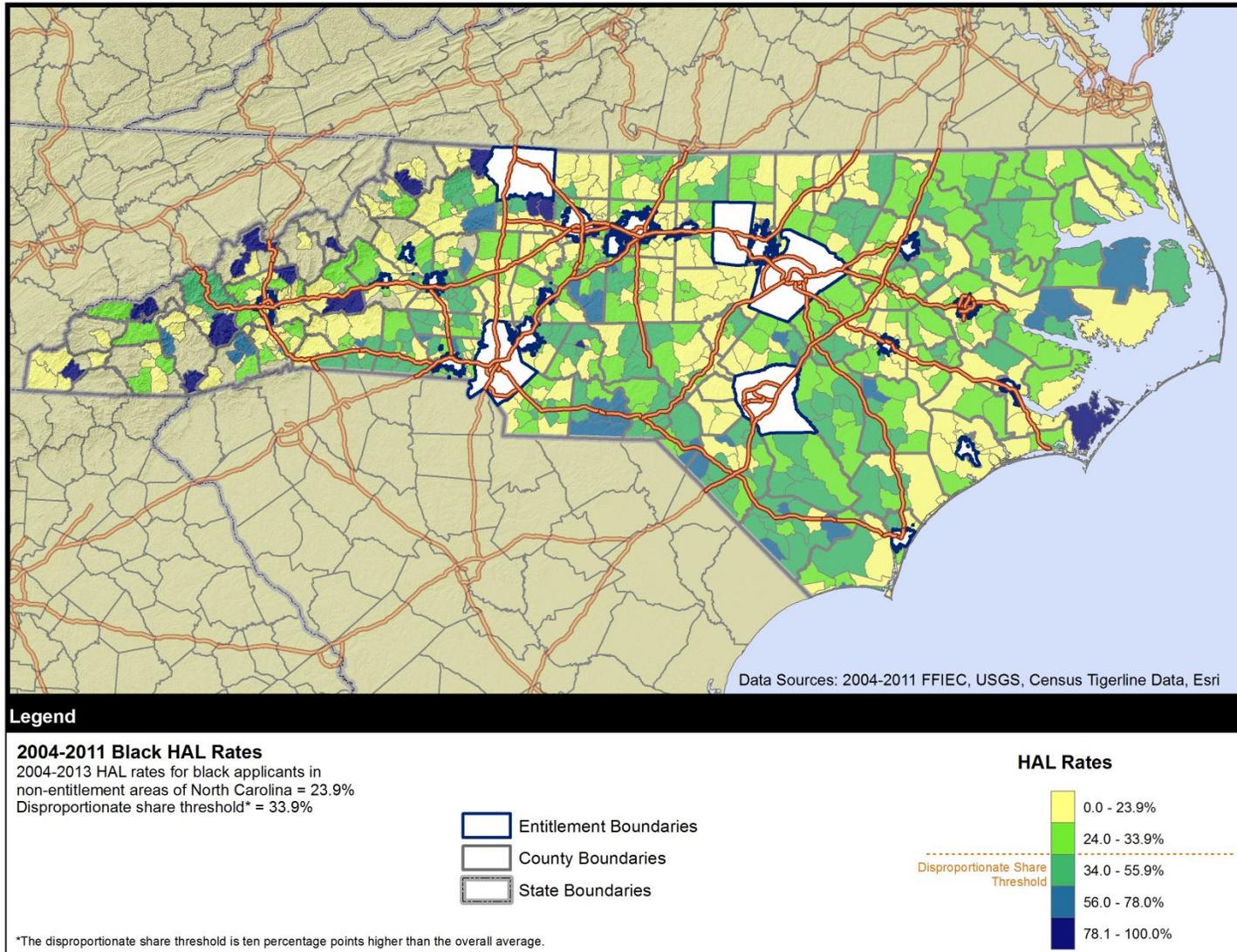
COMMUNITY REINVESTMENT ACT DATA

Small business loan data gathered under the Community Reinvestment Act (CRA) contribute to an overall picture of the economic viability of neighborhoods. These loans were analyzed to determine the location of funding by Census tract income level; these income levels are established with referenced to the area median family income (MFI). Census tracts in which the MFI is 50 percent of the area MFI or less are considered low-income Census tracts; those in which the MFI ranges from 50.1 to 80 percent of the area MFI are considered moderate income Census tracts.

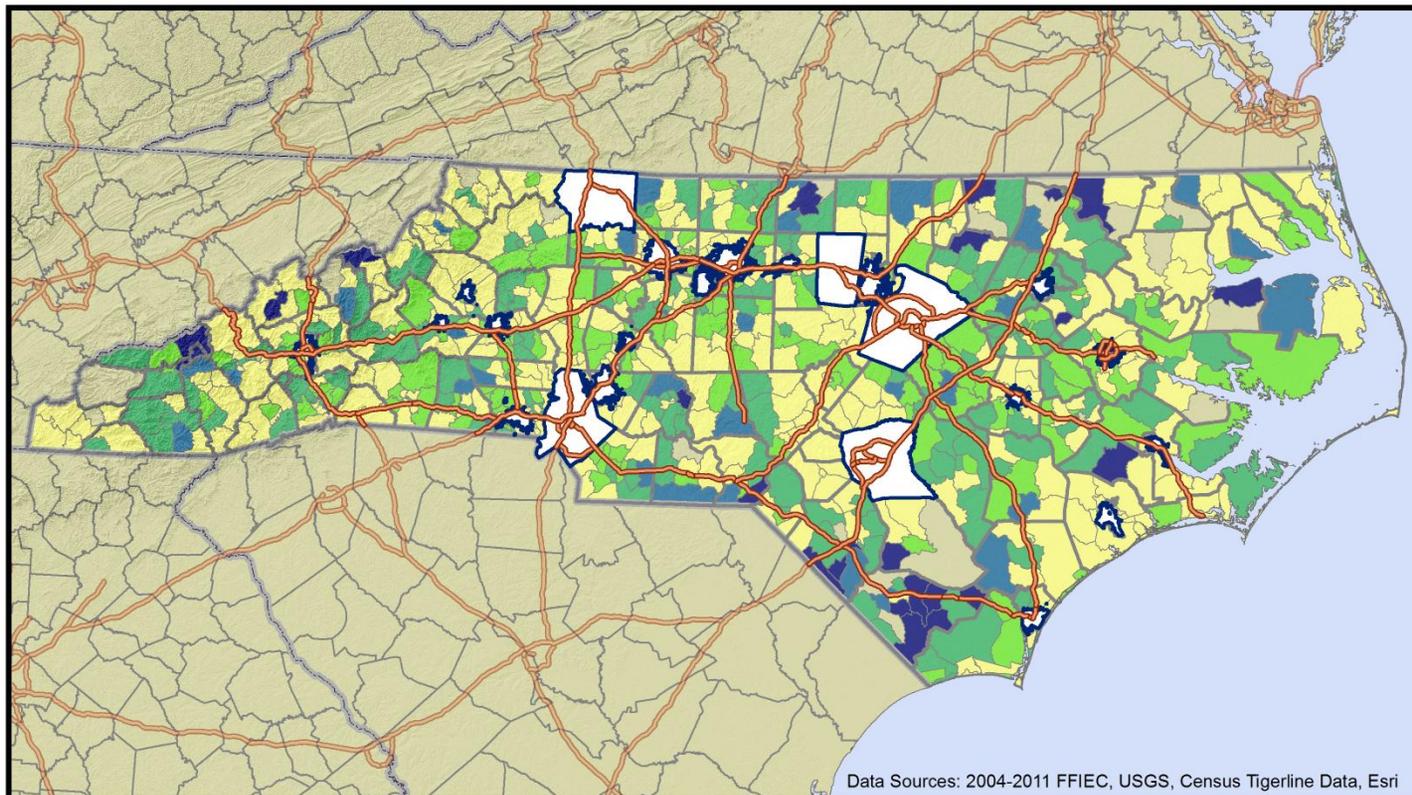
Diagram V.5, below, presents the distribution of small business loans by value and by percent of MFI by Census tract. As the diagram indicates, the 1,490,297 small business loans issued in the state’s non-entitlement areas most commonly went to middle-income Census tracts, in which median family incomes ranged from 80 to 120 percent of the MFI for the areas in which those tracts were located. Such areas received more than 60 percent of loans of all values. Upper-income Census tracts were the next most common targets for small business loans, receiving more than twenty percent of the loans issued in the state’s non-entitlement areas. Low- and moderate-income Census tracts, by contrast, received relatively little in the way of small business loans.



Map V.7
HALs to Black Applicants by Census Tract, 2004-2011
 Non-Entitlement Areas of North Carolina
 2004-2011 HMDA Data, Mapped by Year-2000 Census Tract Boundaries



Map V.8
HALs to Hispanic Applicants by Census Tract, 2004-2011
 Non-Entitlement Areas of North Carolina
 2004–2011 HMDA Data, Mapped by Year-2000 Census Tract Boundaries

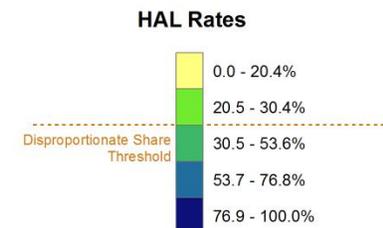


Data Sources: 2004-2011 FFIEC, USGS, Census Tigerline Data, Esri

Legend

2004-2011 Hispanic HAL Rates
 2004-2013 HAL rates for Hispanic applicants in non-entitlement areas of North Carolina = 20.4%
 Disproportionate share threshold* = 30.4%

-  Entitlement Boundaries
-  County Boundaries
-  State Boundaries



*The disproportionate share threshold is ten percentage points higher than the overall average.

As shown in Map V.9 on the following page, small business loans tended to be more common in and around the state’s entitlement areas and less common in large, rural Census tracts. The greatest number of small business loans was issued in a Census tract to the immediate north of Mecklenburg County, which received 13,954 loans from 2000 through 2011. As one might expect, areas with relatively high poverty rates tended to receive comparatively few loans: for instance, the number of small business loans was at or below the statewide median in Census tracts throughout the northern part of the inner coastal plain. This area also held relatively high concentrations of black residents in 2000 and 2010. Tracts near the southern border and along the Interstate 95 corridor also received comparatively few loans.

These trends generally continued after 2011, as shown in Map V.10 on page 97. However, the last two years have also seen a relatively large number of loans going to Census tracts near Wake County.

It is not surprising that the distribution of loan dollars tended to mirror the distribution of loans, and the areas that received the greatest numbers of loans tended to receive the most loan dollars. As shown in Map V.11 on page 98, over \$713,000 in small business loans went to the Census tract to the north of Mecklenburg County from 2000 through 2011, the most loan dollars issued in any individual Census tract. Throughout the state, it was Census tracts in and around the state’s entitlement areas that tended to receive the most loan dollars, while relatively few loan dollars went to rural Census tracts. The pattern in the distribution of loan dollars since 2011 has been similar, as shown in Map V.12 on page 99.

FAIR HOUSING COMPLAINTS

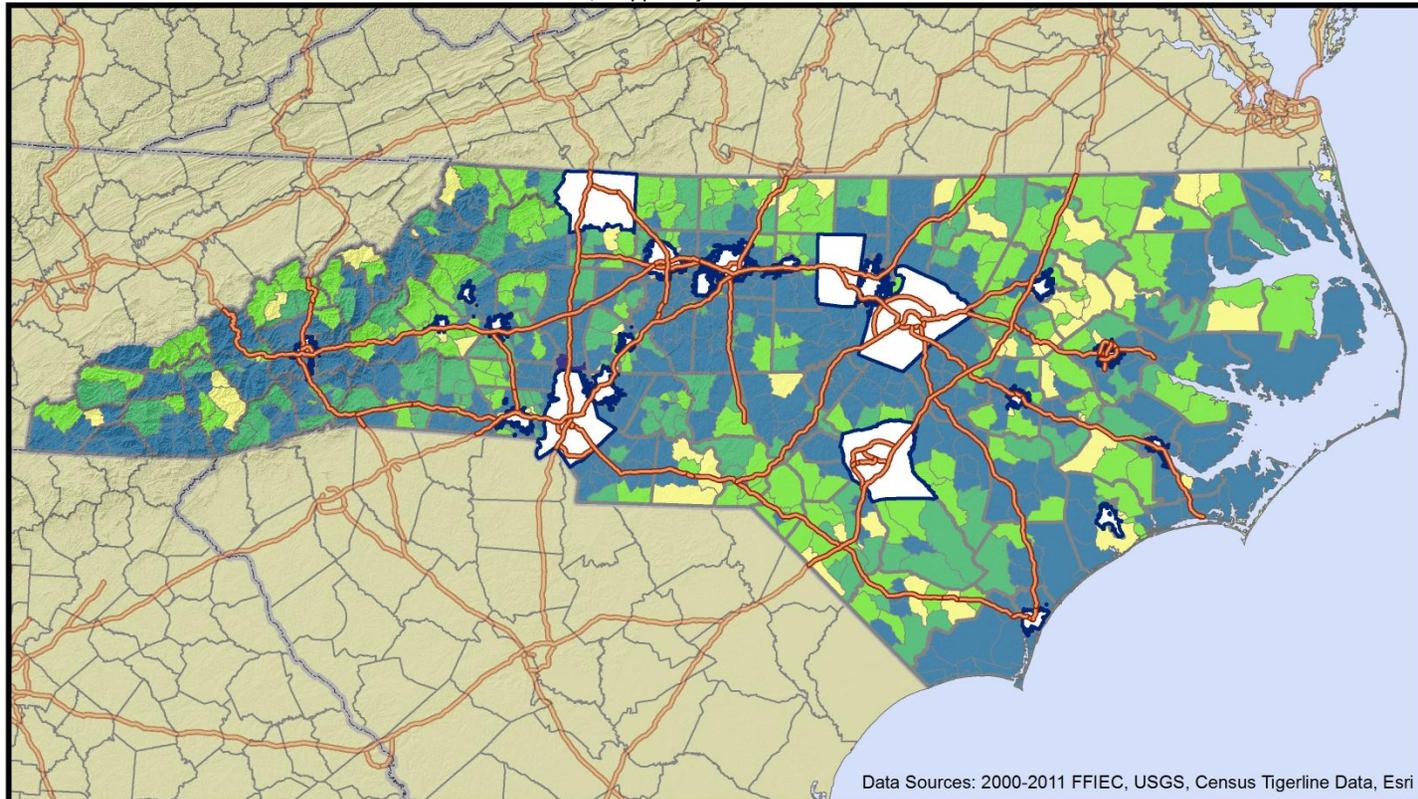
U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

The U.S. Department of Housing and Urban Development maintains records of complaints that represent potential or actual violations of fair housing law. As shown in Table V.11 below, residents of the state’s non-entitlement areas filed 514 complaints from 2004 through 2014. The most common complaint cited racial discrimination, which figured in more than half of the complaints filed across the entire period. The next most common complaint related to disability, which was cited in 194 complaints. Fewer than twelve percent of complaints cited discrimination on any other basis.

Table V.11
Fair Housing Complaints by Basis
 Non-Entitlement Areas of North Carolina
 2004–2014 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
Race	44	14	29	39	37	26	38	19	14	8	8	276
Disability	15	14	20	20	28	21	22	17	15	8	14	194
Family Status	6	2	6	8	12	3	11	2	5	3		58
Sex	10	1	8	6	2	8	10	3	3	6	1	58
National Origin	5	1	3	6	1	5	3	4	3	1	3	35
Retaliation	3			2	1	2	1	2	7	3	5	26
Religion	1			3	1	1			1	1	1	9
Color	1	1	1			3			1			7
Total Bases	85	33	67	84	82	69	85	47	49	30	32	663
Total Complaints	64	30	49	62	71	50	64	40	34	24	26	514

Map V.9
Number of Small Business Loans, 2000-2011
 Non-Entitlement Areas of North Carolina
 2000–2011 CRA Data, Mapped by Year-2000 Census Tract Boundaries



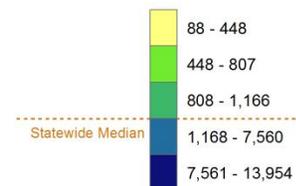
Legend

2000-2011 Small Business Loans

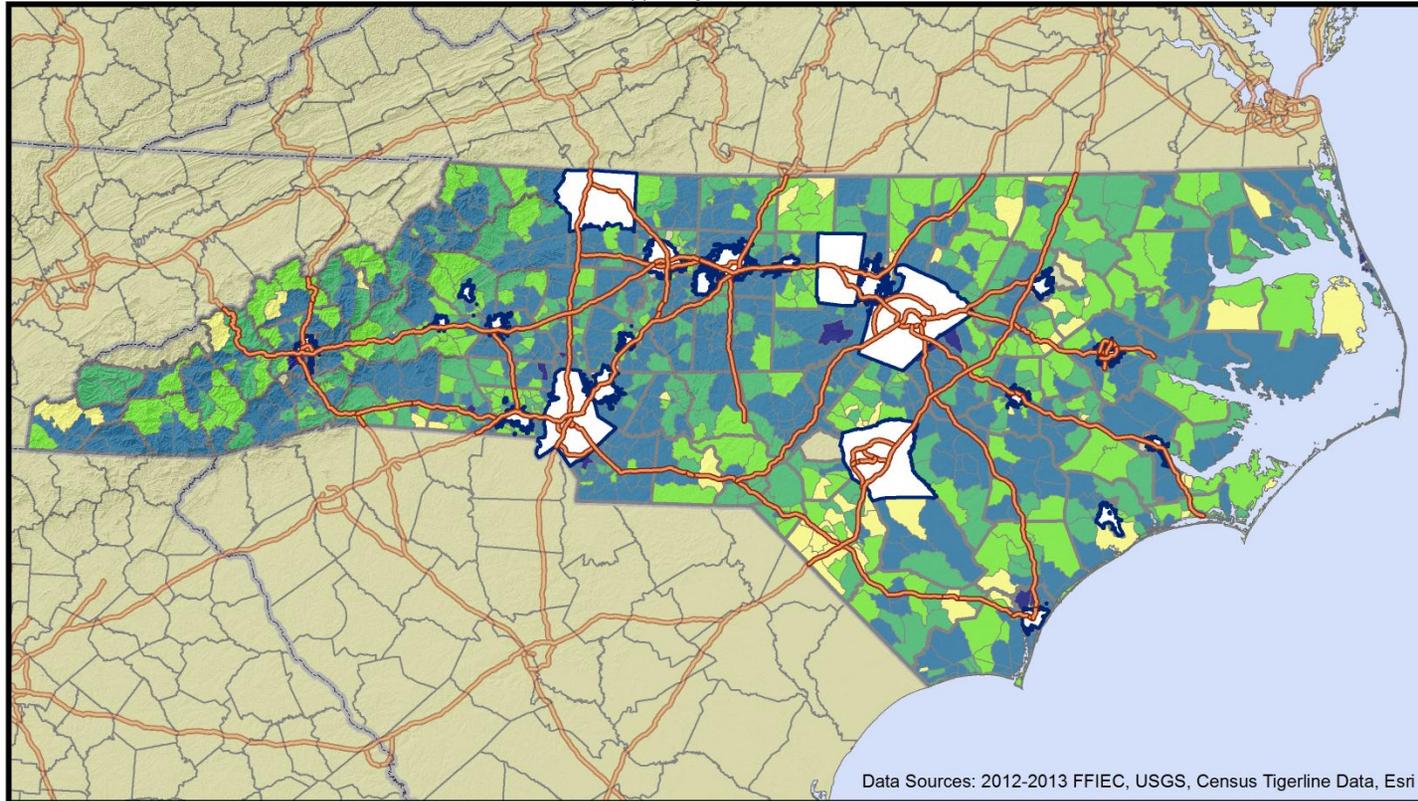
2000-2011 Median number of small business loans per Census tract in non-entitlement areas of North Carolina = 1,166

-  Entitlement Boundaries
-  County Boundaries
-  State Boundaries

Loans



Map V.10
Number of Small Business Loans, 2012-2013
 Non-Entitlement Areas of North Carolina
 2012-2013 CRA Data, Mapped by Year-2010 Census Tract Boundaries



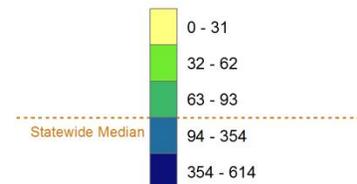
Legend

2012-2013 Small Business Loans

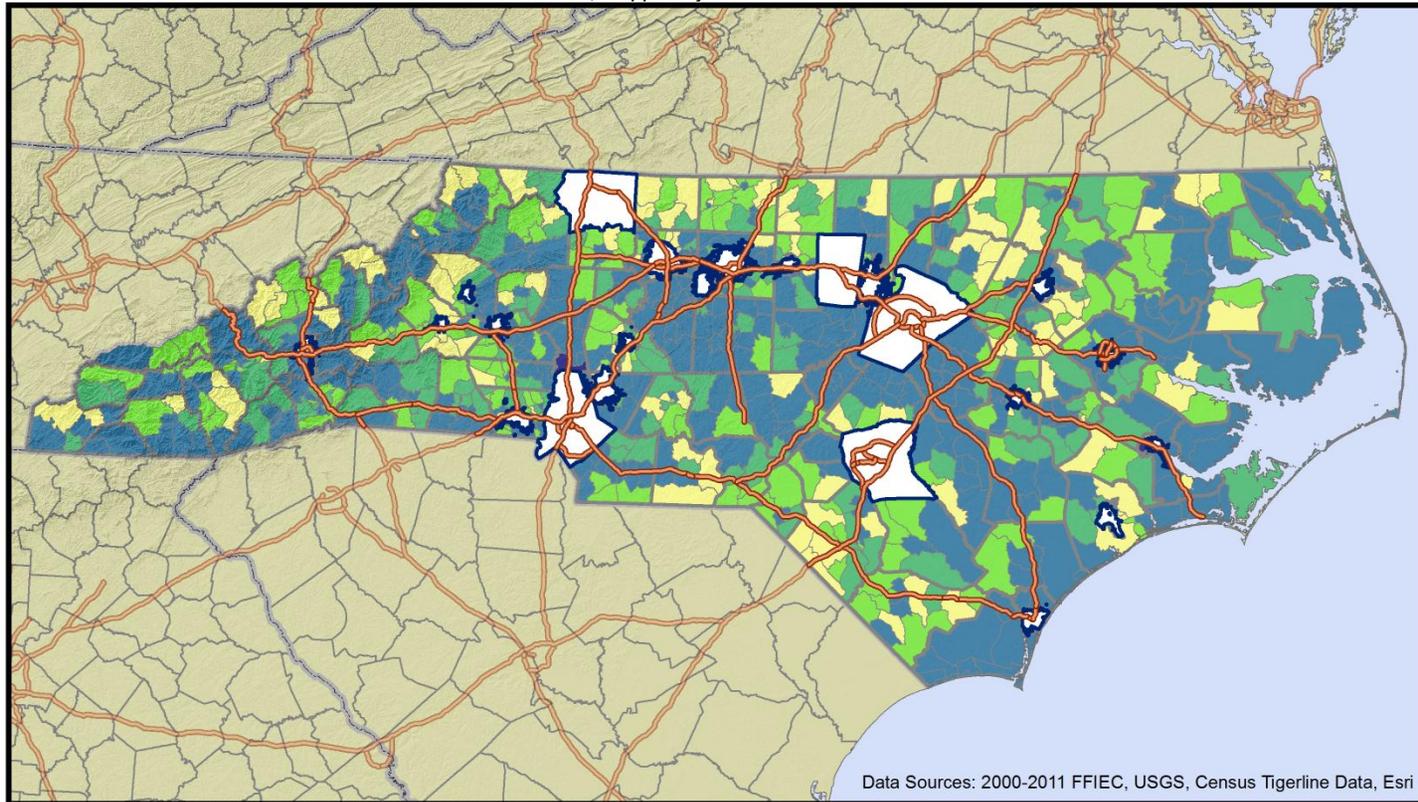
2012-2013 Median number of small business loans per Census tract in non-entitlement areas of North Carolina = 93

-  Entitlement Boundaries
-  County Boundaries
-  State Boundaries

Loans



Map V.11
Amount of Small Business Loan Dollars, 2000-2011
 Non-Entitlement Areas of North Carolina
 2000–2011 CRA Data, Mapped by Year-2000 Census Tract Boundaries



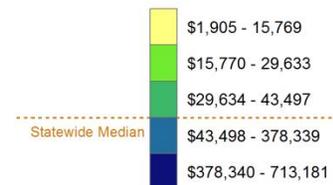
Legend

2000-2011 Dollar Value of Small Business Loans

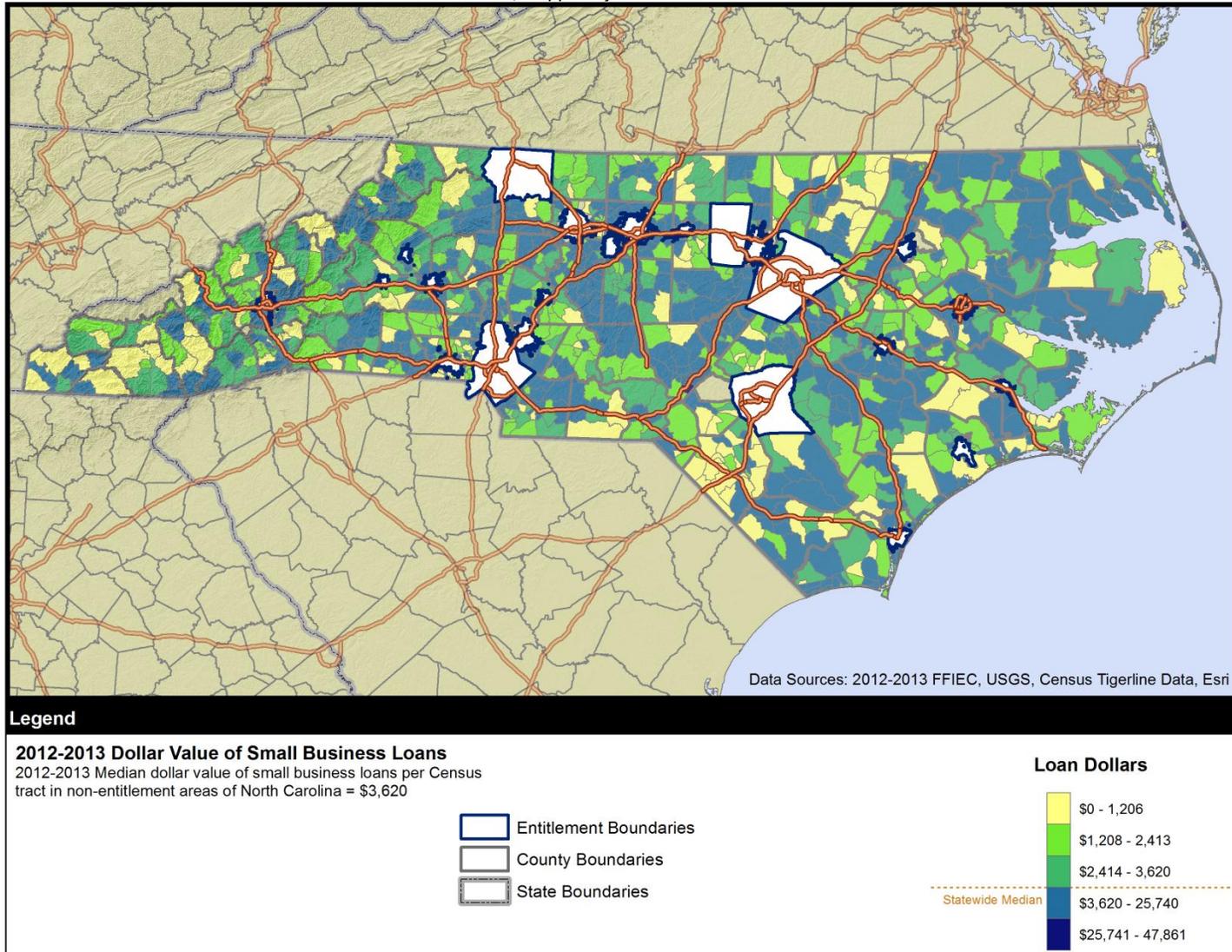
2000-2011 Median dollar value of small business loans per Census tract in non-entitlement areas of North Carolina = \$43,497

-  Entitlement Boundaries
-  County Boundaries
-  State Boundaries

Loan Dollars



Map V.12
Amount of Small Business Loan Dollars, 2012-2013
 Non-Entitlement Areas of North Carolina
 2012-2013 CRA Data, Mapped by Year-2010 Census Tract Boundaries



The most common action or practice cited in these complaints was discrimination in terms, conditions, or privileges relating to rental. As shown in Table V.12 below, this discriminatory “issue” figured in 175 complaints, or around 34 percent. Additional issues that were commonly cited in these complaints included the following (approximate percentage of total complaints in parentheses):

- Discriminatory terms, conditions, privileges, or services and facilities (26 percent);
- Discriminatory acts under Section 818 (17 percent); and
- Failure to make reasonable accommodation (17 percent).

“Discriminatory acts under Section 818” encompass a range of coercive actions that are designed to prevent state residents from exercising their rights under the Fair Housing Act. A complete version of the following table is included in Appendix E.

Table V.12
Fair Housing Complaints by Issue
 Non-Entitlement Areas of North Carolina
 2004–2014 HUD Data

Issue	Total
Discrimination in term, conditions or privileges relating to rental	175
Discriminatory terms, conditions, privileges, or services and facilities	132
Discriminatory acts under Section 818 (coercion, etc.)	89
Failure to make reasonable accommodation	86
Discriminatory refusal to rent	80
Discriminatory advertising, statements and notices	53
Otherwise deny or make housing available	40
Discriminatory financing (includes real estate transactions)	33
Discriminatory refusal to rent and negotiate for rental	30
Failure to permit reasonable modification	17
False denial or representation of availability - rental	15
Discrimination in terms, conditions, privileges relating to sale	15
Discriminatory refusal to sell and negotiate for sale	11
Discriminatory refusal to sell	9
Discrimination in the terms or conditions for making loans	7
Discrimination in services and facilities relating to rental	7
Using ordinances to discriminate in zoning and land use	7
Steering	6
Other discriminatory acts	5
Discriminatory refusal to negotiate for sale	4
Discriminatory refusal to negotiate for rental	4
Discrimination in the selling of residential real property	3
Discrimination in the appraising of residential real property	3
Restriction of choices relative to a rental	3
False denial or representation of availability - sale	2
Refusing to provide municipal services or property	2
Failure to provide an accessible building entrance	2
Failure to provide an accessible route into and thru the covered unit	2
Discriminatory advertisement - rental	1
False denial or representation of availability	1
Discrimination in making of loans	1
Discrimination in the brokering of residential real property	1
Discrimination in terms and conditions of membership	1
Discrimination in services and facilities relating to sale	1
Adverse action against an employee	1
Non-compliance with design and construction requirements (handicap)	1
Discriminatory acts under Section 901 (Criminal)	1
Total Issues	851
Total Complaints	514

As Table V.13 below shows, more than half of those complaints were closed when HUD or the state Human Relations Commission concluded its investigation and determined that there was no cause to believe that discrimination had occurred, or was about to occur. However, over a quarter of complaints ended when the parties reached a successful conciliation agreement, or were withdrawn following voluntary resolution of the complaint.

Table V.13
Fair Housing Complaints by Closure Status
Non-Entitlement Areas of North Carolina
2004–2014 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
No Cause	43	13	21	28	31	24	41	24	19	16	11	271
Conciliated / Settled	12	13	12	15	13	8	4	5	3	3	6	94
Withdrawal After Resolution	2	2	3	2	8	6	8	4	5	1	3	44
Complainant Failed to Cooperate	2		5	6	11	5	7	1	1	1		39
Withdrawal Without Resolution	3		2	6	7	5	4	4	4	1	2	38
Lack of Jurisdiction			2	5		1			1			9
Unable to Locate Respondent	1				1			1				3
FHAP Judicial Consent Order			1							1		2
Litigation Ended – Discrimination Found		1	1									2
Administrative Hearing Ended – No Discrimination Found		1										1
Untimely Filed	1											1
Election Made to Go to Court			1									1
DOJ Dismissal			1									1
FHAP Judicial Dismissal								1				1
Administrative Closure									1	1	4	7
Open						1						1
Total Complaints	64	30	49	62	71	50	64	40	34	24	26	514

Unlike complaints overall, those that were found to have cause, were settled, or were otherwise resolved most commonly alleged discrimination on the basis of disability. As shown in Table V.14 below, disability was cited in 66 complaints, or 47.1 percent. The next most common allegation in resolved complaints cited discrimination based on race, which was cited in 60 complaints, and sex, cited in 16 complaints.

Table V.14
Resolved Fair Housing Complaints by Basis
Non-Entitlement Areas of North Carolina
2004–2014 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
Disability	5	8	8	9	11	6	5	4	4		6	66
Race	7	6	7	6	9	10	7	3	2	1	2	60
Sex	4	1	2		2	3			1	3		16
Family Status		2	3	2	1	1	1		3			13
National Origin	1		2	1	1	1	1	2	1		1	11
Religion	1			1							1	3
Retaliation	1										1	2
Color						1						1
Other Origin												
Total Bases	19	17	22	19	24	22	14	9	11	4	11	172
Total Complaints	14	16	16	17	21	14	12	9	8	4	9	140

The discriminatory issues involved in complaints that were found to have cause, or were otherwise resolved, were similar to those cited in complaints overall. However, as shown in Table V.15 below, an exception was to be found in the case of complaints alleging failure to make reasonable accommodation: these complaints, which were the fourth most common in complaints overall, were the second-most common in resolved complaints. A complete version of this table, with complaint data for all years, is included in Appendix E.

Table V.15
Resolved Fair Housing Complaints by Issue
 Non-Entitlement Areas of North Carolina
 2004–2014 HUD Data

Issue	Total
Discrimination in term, conditions or privileges relating to rental	51
Failure to make reasonable accommodation	31
Discriminatory terms, conditions, privileges, or services and facilities	29
Discriminatory acts under Section 818 (coercion, etc.)	21
Discriminatory refusal to rent	20
Discriminatory advertising, statements and notices	14
Otherwise deny or make housing available	11
Failure to permit reasonable modification	10
Discriminatory refusal to rent and negotiate for rental	5
False denial or representation of availability - rental	4
Discrimination in terms, conditions, privileges relating to sale	4
Discriminatory financing (includes real estate transactions)	3
Discrimination in services and facilities relating to rental	2
Other discriminatory acts	2
Discriminatory refusal to sell	1
Discriminatory refusal to negotiate for sale	1
Discriminatory refusal to sell and negotiate for sale	1
Discriminatory refusal to negotiate for rental	1
Discrimination in the appraising of residential real property	1
Discrimination in terms and conditions of membership	1
Steering	1
Restriction of choices relative to a rental	1
Refusing to provide municipal services or property	1
Non-compliance with design and construction requirements (handicap)	1
Failure to provide an accessible building entrance	1
Failure to provide an accessible route into and thru the covered unit	1
Total Issues	219
Total Complaints	140

NORTH CAROLINA HUMAN RELATIONS COMMISSION

As the agency empowered by North Carolina law to enforce the state’s fair housing law, the North Carolina Human Relations Commission is charged with accepting fair housing complaints from state residents who believe that they have been subjected to illegal discrimination in the housing market. As shown in Table V.16 on the following page, the Human Relations Commission received 597 fair housing complaints from state residents between 2008 and August of 2015. The most common complaints related to alleged discrimination on the basis of race and disability, which figured in 42.4 and 39.7 percent of complaints, respectively. Discrimination on the basis of sex was third most common, figuring in around 12 percent of complaints, followed by complaints based on family status, which was cited in a similar share of complaints.

Table V.16
Fair Housing Complaints by Basis
 Non-Entitlement Areas of North Carolina
 January 2008 - August 2015 HRC Data

Basis	2008	2009	2010	2011	2012	2013	2014	2015	Total
Race	49	40	53	38	19	19	20	15	253
Disability	42	30	34	35	23	25	23	25	237
Sex	16	10	22	5	2	7	7	3	72
Family Status	10	8	21	10	8	5	5	4	71
National Origin	10	8	10	6	4	1	5	7	51
Religion	1	1	3		1	1	1	1	9
Color		1	2		1	1			5
Retaliation / Coercion			1		1	1	1		4
Affordable Housing								1	1
Missing Basis	6	8							14
Total Bases	134	106	147	94	60	61	63	56	721
Total Complaints	117	86	107	80	53	53	54	47	597

As was the case with complaints recorded by HUD, many of which number among complaints filed with the Human Relations Commission, it was common for complaints to be found to have no cause. As shown in Table V.17 below, 285 complaints ended with a finding of no cause, or around 47.7 percent of complaints. The next most common outcome for these complaints was conciliation or settlement, which resolved around 13 percent of complaints; around 9.4 percent were otherwise withdrawn after resolution. Thirty-five complaints were still open as of August 2015.

Table V.17
Fair Housing Complaints by Closure Status
 Non-Entitlement Areas of North Carolina
 January 2008 - August 2015 HRC Data

Closure Status	2008	2009	2010	2011	2012	2013	2014	2015	Total
No Cause	50	35	59	50	30	27	26	8	285
Conciliated/Settled	17	12	8	11	2	9	15	3	77
Withdrawal with Resolution	7	7	15	9	8	5	4	1	56
Failure to Cooperate	16	10	14	2	5	2	2		51
Open							2	33	35
Withdrawal without Resolution	10	4	3	1	5	1	5	1	30
Transferred to HUD		9	2	2		1			14
Cause Missing	9	1		1	2	1			14
Conciliated After Finding of Cause	1		2	3		1			7
Withdrawal	1	3	3						7
Cause		1		1		3			5
Dismissed for Lack of Jurisdiction	1	3							4
Reactivated	2					2			4
Unable to Locate Respondent	1	1	1		1				4
Complaint Documents not Returned						1		1	2
Indeterminate	2								2
Complaints	117	86	107	80	53	53	54	47	597

LEGAL AID OF NORTH CAROLINA

The Fair Housing Project, which is a project of Legal Aid of North Carolina, also accepts and investigates complaints filed by state residents. As shown in Table V.18 on the following page, these complaints differ somewhat from complaints filed with HUD in that the most common discriminatory basis cited in these complaints was disability. In fact, disability-based complaints were not only more common, but predominant; three-quarters of complaints filed with the Fair

Housing Project related to disability. The next most common complaint cited racial discrimination, which figured in 14.5 percent of complaints, and sex, cited in around 13 percent of complaints. It should be noted that many of the disability-based complaints filed with the Fair Housing Project were not filed with HUD or the HRC, either because they related to ongoing litigation or because they were resolved before rising to the level of formal complaint.

Table V.18
Fair Housing Complaints by Basis
The State of North Carolina

May 2011 – June 2015 LANC Fair Housing Project Data

	2011		2012		2013		2014		2015	Total
	May - Oct	Nov-Jan	Feb-Oct	Nov-Jan	Feb - Oct	Nov-Jan	Feb - Dec	Jan - June		
Disability	58	26	92	18	99	20	98	57	468	
Race	14	4	20	3	28	1	20	6	96	
Sex	12	5	13	5	19	7	19	6	86	
Family Status	8	3	12	1	7	2	9	3	45	
National Origin	2	1	8	1	2	2	2		18	
Religion	3					1		1	5	
Affordable Housing					2				2	
Color									0	
Other						1	1	2	4	
Total Bases	97	39	145	28	157	34	149	75	724	
Total Complaints	85	39	135	27	146	26	133	71	662	

FAIR HOUSING SURVEY – PRIVATE SECTOR RESULTS

Additional evaluation of fair housing within the State of North Carolina was conducted through an online survey of stakeholders that began in April 2015. The purpose of the survey was to gather insight into the knowledge, experiences, opinions, and feelings of stakeholders and interested citizens regarding fair housing. Results and comments related to the questions in the private sector are presented below, and additional survey results are discussed in **Sections VI and VII**.

The 2015 State of North Carolina Fair Housing Survey was completed by 526 persons in the state and was conducted entirely online. Individuals solicited for participation included representatives of housing groups, minority organizations, disability resource groups, real estate and property management associations, banking entities, and other groups involved in the fair housing arena. Most questions in the survey required simple “yes,” “no,” or “don’t know” responses, although many questions allowed the respondent to offer written comments. When many respondents reported that they were aware of questionable practices or barriers, or when multiple narrative responses indicated similar issues, findings suggested likely impediments to fair housing choice.

Numerical tallies of results and summaries of some comment-driven questions are presented in this section. A complete list of written responses is available in Appendix B.

FAIR HOUSING IN THE PRIVATE SECTOR

In order to address perceptions of fair housing in the State of North Carolina’s private housing sector, survey respondents were asked to identify their awareness of possible housing discrimination issues in a number of areas within the private housing sector, including the:

- Rental housing market,
- Real estate industry,
- Mortgage and home lending industry,
- Housing construction or accessible housing design fields,
- Home insurance industry,
- Home appraisal industry, and
- Any other housing services.

The results of the private sector portion of the Fair Housing Survey are presented in Table V.19 below. Note that where percentages are given in the following narrative, those figures were based only on survey-takers who actually responded to each question; missing responses were omitted.

As shown, the most salient fair housing concerns among survey respondents pertained to policies and practices in the rental housing market and mortgage and home lending industry. Over twenty-nine percent of survey respondents were aware of questionable practices in the rental housing market. Those who provided additional commentary on this question highlighted perceived discrimination on the basis of familial status or race, as well as the challenges stemming from an overall shortage of affordable housing units. In addition, around 19 percent of survey respondents were aware of questionable practices or barriers to fair housing choice in the mortgage or home lending industry, with many respondents citing perceived discrimination on the basis of race and sex and stating that minority applicants and women tended to receive loans with higher interest rates.

More than ten percent of respondents were aware of potential challenges in the real estate and home appraisal industries, while fewer than ten percent noted an awareness of barriers to fair housing choice in the housing construction, accessible housing design, and home insurance fields, or in any other fair housing services.

Table V.19
Barriers to Fair Housing in the Private Sector
 State of North Carolina
 2015 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
The rental housing market?	99	136	99	192	526
The real estate industry?	53	141	142	190	526
The mortgage and home lending industry?	63	131	139	193	526
The housing construction or accessible housing design fields?	31	158	142	195	526
The home insurance industry?	20	138	173	195	526
The home appraisal industry?	39	132	161	194	526
Any other housing services?	24	135	170	197	526

SUMMARY

A number of factors affect the housing choices available to residents of North Carolina's non-entitlement areas: such factors include patterns in home purchase and small business lending, perceived and actual discrimination in the housing market, and policies and practices of individuals and businesses in the housing market. For the present study, assessment of these factors was undertaken through a review of lending data collected from the Federal Financial Institutions Examination Council (FFIEC); complaint data collected by federal and state agencies and organizations; and the 2015 State of North Carolina Fair Housing Survey.

Banks and other lending institutions handled 3.7 million loans in the state's non-entitlement areas from 2004 through 2013, of which 1.4 million were home-purchase loans. Around 84.2 percent of these home purchase loans were intended to finance the purchase of a home in which the applicant intended to live, and around 570,000 applicants successful secured a new loan on a home.

However, 22.8 percent of home loan applications were denied between 2004 and 2013, and the rate of loan denials has gone up in recent years. Moreover, applicants were more likely to be denied if they were female than if they were male, black than if they were white, and Hispanic than if they were non-Hispanic. The gap between denial rates for female and male applicants, 7.6 percentage points on average, ranged from 4.5 to 13.2 percentage points, depending on the year, and has been relatively wide in recent years. The denial rate for black applicants, at 40.1 percent over the ten-year period, was more than twice that of white applicants. Similarly, Hispanic applicants faced a denial rate that was over nine percentage points higher than the denial rate for non-Hispanic applicants.

Credit history was a common reason for loan denials, as was the applicant's debt-to-income ratio, so it is no surprise that denial rates tended to fall as the income of the applicant rose. However, disparities in loan denial rates by sex, race, and ethnicity tended to persist even when income was taken into account. For example, black applicants earning \$60,000 to \$75,000 per year were still around twice as likely to be turned down as white applicants in the same income range. Meanwhile, the denial rate for Hispanic applicants in that income range was 19.4 percent, more than five percentage points higher than the denial rate for non-Hispanic applicants who were similarly situated with respect to income.

In some cases, successful loan applicants were issued loans with comparatively high annual percentage rates. These high-cost "HALs" represented 12.1 percent of loans issued from 2004 through 2013. HAL rates were considerably higher in 2005 and 2006, but have fallen dramatically since that time. By 2009, the HAL rate had fallen below 5 percent.

However, as was the case with denied home loan applications, borrowers in the state's non-entitlement areas were impacted differently by high-cost lending according to their race or ethnicity. Around 24 percent of loans issued to black borrowers over the ten-year period were HALs, compared to a HAL rate of 10.4 percent for white borrowers. Similarly, nearly 20 percent of loans issued to Hispanic borrowers were HALs, compared to a HAL rate of 11.2 percent for non-Hispanic borrowers.

Geographically speaking, residents of rural Census tracts were more likely to be denied a loan and, if they were successful in their loan application, to be issued high-cost loans. This was particularly true along the inner coastal plain, though denial rates and HAL rates generally tended to be higher in Census tracts that lay further from entitlement communities or the state's barrier islands.

Analysis of small business lending indicates that lenders were generally more active in middle- to high-income Census tracts, with relatively few small business loans or loan dollars going to low- and moderate-income Census tracts. Geographically, this generally meant that small business lending tended to focus on areas around the state's entitlement jurisdictions and coastal areas, and to bypass more sparsely populated rural tracts in the north and south of the state, and especially along the inner coastal plains.

Fair housing complaints filed with the Department of Urban Development and the North Carolina Human Relations Commission most commonly cited perceived racial discrimination, followed by discrimination on the basis of disability. Disability-based discrimination figured in a majority of complaints filed with the Fair Housing Project, which has accepted many disability-related complaints that are not ultimately filed with HUD or the North Carolina Human Relations Commission, either because they represent ongoing litigation or because they are resolved before the issue rises to the level of formal complaint. Discrimination in the rental housing market figured prominently among HUD complaints, as did failure to make reasonable accommodation. HUD and NCHRC complaints were rarely found to have cause; more commonly they were resolved through settlement or conciliation. However, a majority of HUD complaints were found to be without cause, as were around 48 percent of complaints filed with the Human Relations Commission.

Responses of state residents and stakeholders to the 2015 North Carolina Fair Housing Survey indicate that respondents were more likely to be aware of potential fair housing issues and questionable practices in the rental housing market and mortgage and home lending industry than in other areas. Those who elaborated on their responses by providing additional commentary highlighted perceived discrimination on the basis of race, sex, and familial status, as well as the challenges stemming from an overall lack of affordable housing.

SECTION VI. FAIR HOUSING IN THE PUBLIC SECTOR

While the previous section presented a review of the status of fair housing in the private sector, this section will focus specifically on fair housing in the public sector. The U.S. Department of Housing and Urban Development (HUD) recommends that the AI investigate a number of housing factors within the public sector, including health and safety codes, construction standards, zoning and land use policies, tax policies, and development standards. The AI should also examine the placement of public and publicly assisted housing as well as its access to government services.

PUBLIC SERVICES

Community features, including public services and facilities, and the location of public and assisted housing are essential parts of good neighborhoods, leading to a more desirable community.

MULTI-FAMILY ASSISTED HOUSING UNITS

Public or assisted housing can exist in several forms, including low-income housing projects, housing voucher programs, and supportive housing. The objective of public and other forms of assisted housing is to provide housing that is suitable for persons with special needs or families of low- to moderate-income levels and to promote access to jobs, transportation, and related community resources. Uneven distribution of public and assisted housing can be the result of an impediment such as land use policies that discourage multi-family or low-income housing in some areas, thus leading to segregation or the overconcentration of low-income and other populations.

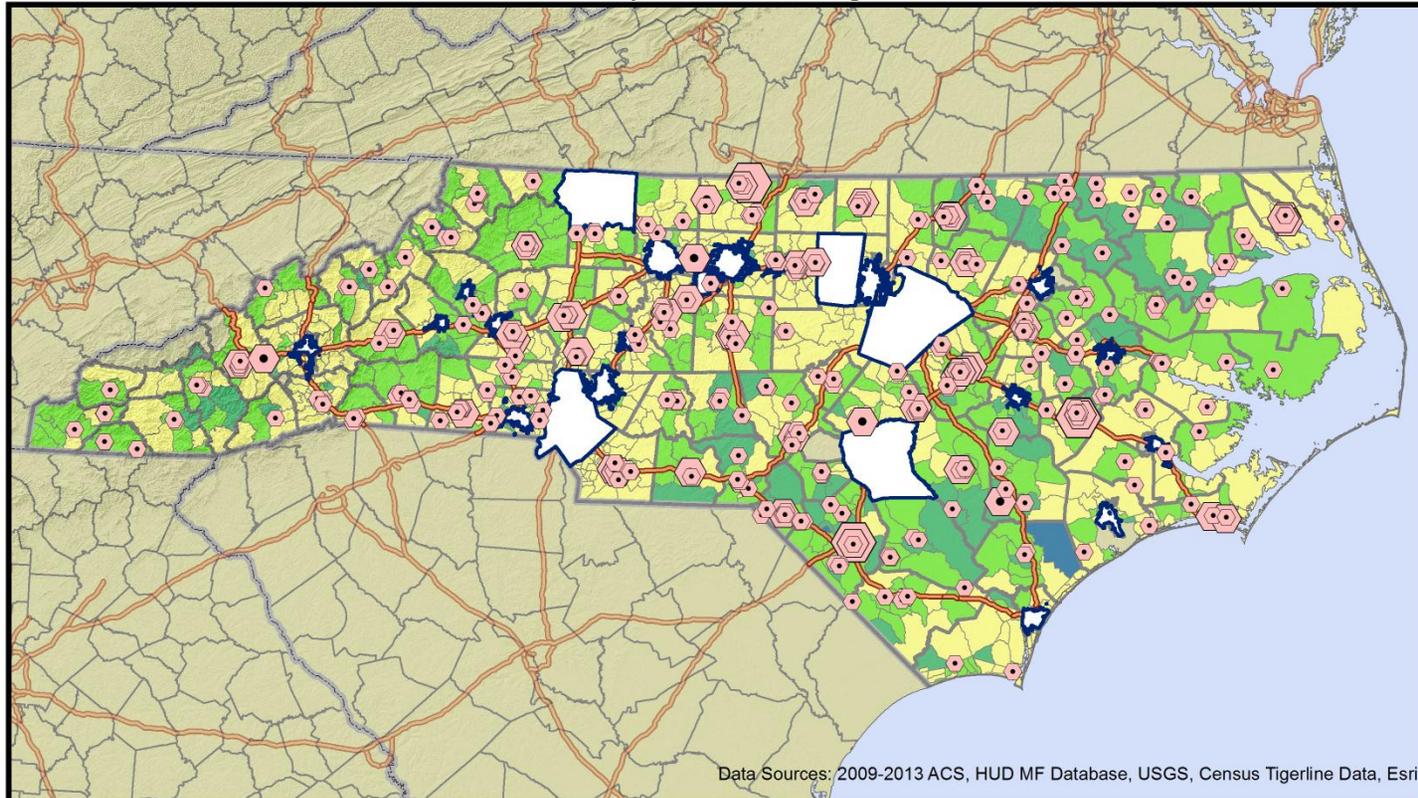
HUD multifamily housing projects were distributed widely throughout the state, and were generally located along major transportation corridors, as shown in Map VI.1 on the following page.

LOW-INCOME HOUSING TAX CREDIT PROGRAM

The Low-Income Housing Tax Credit (LIHTC) Program is designed to promote investment in affordable rental housing by providing tax credits to developers of qualified projects. To qualify for the tax credits, housing projects must be residential rental properties in which a proportion of available units are rent-restricted and reserved for low-income families. Property owners are required to maintain rent and income restrictions for at least thirty years, pursuant to the HUD-mandated minimum affordability period, though in some areas they are required to operate under these restrictions for longer time periods.

The distribution of LIHTC units in the state was similar to the distribution of multifamily housing units, as shown in Map VI.2 on page 111.

Map VI.1
Multi-Family Assisted Housing Units
 Non-Entitlement Areas of North Carolina
 2015 Multi-family and Section 8 Housing Database



Data Sources: 2009-2013 ACS, HUD MF Database, USGS, Census Tigerline Data, Esri

Legend

HUD Multifamily Projects and Poverty

2009-2013 Overall poverty rate in non-entitlement areas of North Carolina = 17.7%

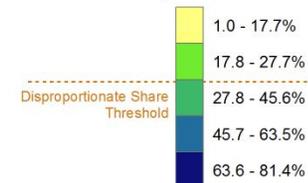
Disproportionate share threshold* = 27.7%

-  Entitlement Boundaries
-  County Boundaries
-  State Boundaries

HUD Multifamily Projects

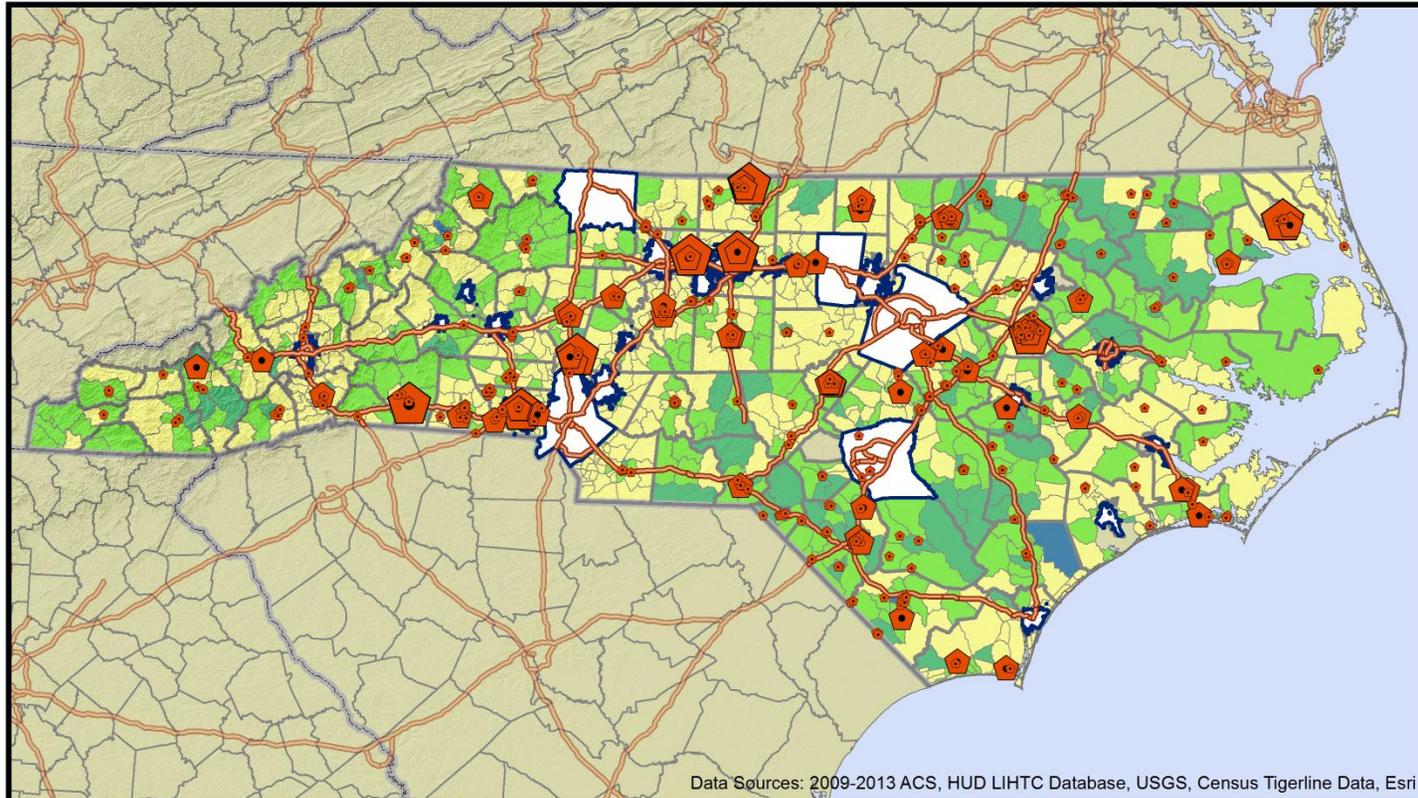
-  4 - 50
-  51 - 100
-  101 - 148

Poverty Rates



*The disproportionate share threshold is ten percentage points higher than the overall average.

Map VI.2
Low Income Housing Tax Credits
 Non-Entitlement Areas of North Carolina
 2015 HUD LIHTC Database



Legend

Low-Income Housing Tax Credit Projects and Poverty

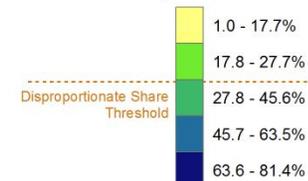
2009-2013 Overall poverty rate in non-entitlement areas of North Carolina = 17.7%
 Disproportionate share threshold* = 27.7%

-  Entitlement Boundaries
-  County Boundaries
-  State Boundaries

LIHTC Projects

-  0 - 50
-  51 - 100
-  101 - 155

Poverty Rates



*The disproportionate share threshold is ten percentage points higher than the overall average.

FAIR HOUSING SURVEY – PUBLIC SECTOR RESULTS

As mentioned previously, further evaluation of the status of fair housing within State of North Carolina was conducted via an online 2015 Fair Housing Survey, which was completed by 526 stakeholders and citizens. Those solicited for participation included a wide variety of individuals in the fair housing arena. Most questions in the survey required “yes,” “no,” or “don’t know” responses, and many allowed the respondent to offer written comments. While the numerical tallies of results are presented in this section, along with summaries of some comment-heavy questions, a complete list of written responses is available in Appendix B. Other survey results are also discussed in **Sections V** and **VII**.

FAIR HOUSING IN THE PUBLIC SECTOR

Public sector effects on housing can be complex and varied. The questions in this section of the survey asked respondents to think about possible barriers to fair housing choice within very specific areas of the public sector, as follows:

- Land use policies,
- Zoning laws,
- Occupancy standards or health and safety codes,
- Property tax policies,
- Permitting processes,
- Housing construction standards,
- Neighborhood or community development policies,
- Access to government services, and
- Any other public administrative actions or regulations.

Responses to these questions are presented in Table VI.1 on the following page. As before, percentage figures presented in the following narrative do not include missing responses.

Larger shares of respondents professed to be aware of questionable practices or barriers to fair housing choice in land-use policies, zoning laws, and in limited access to government services than in other public sector areas. Around 17.5 percent of respondents were aware of questionable practices or barriers to fair housing choice in land-use policies, citing local policies that limit the placement of affordable housing units to low-income areas of the community. Just over a fifth of respondents were aware of questionable practices in local zoning laws, with many respondents citing some of the same issues highlighted in the previous question concerning land-use policies. One-third of respondents were aware of questionable practices or barriers in the provision of government services, with a large share of those respondents citing limitations in the availability of public transportation.

In addition to those areas, around 15 percent of respondents were aware of fair housing issues in occupancy standards or health and safety codes, nearly 12 percent were aware of problematic neighborhood or community development policies, and about 11 percent were aware of potential barriers in other public administrative actions or regulations. In all other areas, the share of respondents who were aware of questionable practices or barriers to fair housing choice was ten percent or less.

Table VI.1
Barriers to Fair Housing in the Public Sector

State of North Carolina
 2015 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
Land use policies?	54	128	127	217	526
Zoning laws?	69	107	132	218	526
Occupancy standards or health and safety codes?	46	130	132	218	526
Property tax policies?	29	121	157	219	526
Permitting process?	20	120	168	218	526
Housing construction standards?	25	130	152	219	526
Neighborhood or community development policies?	36	124	145	221	526
Limited access to government services, such as transportation or employment services?	99	110	91	226	526
Public administrative actions or regulations?	33	97	175	221	526

SUMMARY

Fair housing choice in the state's non-entitlement areas is impacted by a number of factors in the public sector, including the extent and distribution of publicly-subsidized housing units; land-use and zoning laws, policies, and practices; and the provision of government services, among others.

Assisted units, whether subsidized directly by HUD or through low-income housing tax credits, were widespread in the state, though they tended to be clustered along major transportation corridors and around cities.

Respondents to the 2015 Fair Housing Survey were more likely to state an awareness of fair housing issues when considering land-use policies, zoning laws, and access to government services than other areas of the public sector. Over 17 percent of respondents maintained that they were aware of potential barriers to fair housing choice in land-use decisions, while over a fifth cited questionable practices in zoning laws. In both cases, respondents who provided additional commentary cited local policies that serve to limit the placement of affordable housing units to low-income areas of the community. Finally, around one third of respondents highlighted limited access to government services, with many citing a need for greater access to public transit and employment services.

SECTION VII. PUBLIC INVOLVEMENT

This section discusses analysis of fair housing in the State of North Carolina as gathered from various public involvement efforts conducted as part of the AI process. Public involvement feedback is a valuable source of qualitative data about impediments, but, as with any data source, citizen comments alone do not necessarily demonstrate the existence of statewide impediments to fair housing choice. However, survey and forum comments that support findings from other parts of the analysis reinforce findings concerning impediments to fair housing choice.

FAIR HOUSING SURVEY

As discussed in previous sections, a 2015 Fair Housing Survey comprised a large portion of the public involvement efforts associated with the development of the 2015 AI. While data from the survey regarding policies and practices within the private and public sectors have already been discussed, questions included to gauge and characterize public participation in the survey are discussed below.

The purpose of the 2015 Fair Housing Survey, a relatively qualitative component of the AI, was to gather insight into knowledge, experiences, opinions, and feelings of stakeholders and interested citizens regarding fair housing as well as to gauge the ability of informed and interested parties to understand and affirmatively further fair housing. Many organizations and individuals throughout the State were solicited to participate.

A total of 526 persons in the State of North Carolina completed the survey, which was conducted entirely online. A complete list of responses is included in Appendix B. Other survey results are also discussed in **Sections V and VI**.

Respondents to the 2015 Fair Housing Survey played a variety of roles in the housing industry: as shown in Table VII.1 at right, some 133 respondents worked in property management, 104 were service providers, 78 were advocates/service providers, 77 were local government officials, and 26 worked in construction/development.

Table VII.1
Role of Respondent
State of North Carolina
2015 Fair Housing Survey Data

Primary Role	Total
Property Management	133
Service Provider	104
Advocate/Service Provider	78
Local Government	77
Construction/Development	26
Banking/Finance	9
Real Estate	6
Insurance	4
Appraisal	1
Law/Legal Services	1
Other Role	80
Missing	7
Total	526

Table VII.2
What is your housing status?

State of North Carolina
2015 Fair Housing Survey Data

Tenure	Total
Homeowner	275
Renter	94
Other	145
Missing	12
Total	526

As shown in Table VII.2 at left, 275 respondents identified themselves as homeowners, 94 as renters, and 145 identified their housing status as “other”.

Survey respondents generally considered themselves at least somewhat familiar with fair housing laws: as shown in Table VII.3 on the following page, only 39 respondents, about 10 percent, felt that they were not familiar with fair housing laws.

Nearly half considered themselves very familiar with fair housing laws.

Respondents also offered their assessment of fair housing laws in a series of questions relating to the usefulness and effectiveness of those laws; responses to these questions are summarized in Table VII.4 below. As shown, 364 respondents considered fair housing laws to be useful, or around 91 percent of those who responded to the question. However, survey respondents were more divided on other aspects of fair housing law: A majority did not find fair housing laws to be difficult to understand or follow, though a sizeable minority, or 32 percent, did consider them to be difficult to understand or follow. Respondents were closely divided on the question of whether fair housing laws should recognize additional groups: 30 percent felt that they should, citing a need for protections based on sexual orientation, income (including “low income” and “source of income”), and criminal history. Respondents generally considered fair housing laws to be adequately enforced, though a sizeable minority, just fewer than 30 percent, did not.

Table VII.3
How Familiar are you with Fair Housing Laws?
State of North Carolina
2015 Fair Housing Survey Data

Familiarity	Total
Not Familiar	39
Somewhat Familiar	161
Very Familiar	195
Missing	131
Total	526

Table VII.4
Federal, State, and Local Fair Housing Laws
State of North Carolina
2015 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Do you think fair housing laws are useful?	364	8	26	128	526
Are fair housing laws difficult to understand or follow?	128	230	38	130	526
Do you think additional groups should be protected under the State fair housing law?	117	113	160	136	526
Do you think fair housing laws are adequately enforced?	241	109	25	151	526

Some 241 respondents reported that they were aware of a training process available to learn about fair housing laws, and 219 noted that they had participated in such training, as shown in Table VII.5 below. Nevertheless, around 42 percent of respondents felt that current levels of outreach and education were insufficient; just under a quarter of respondents felt that current outreach and education efforts were adequate, and less than one percent felt that they were excessive. More than half of respondents reported that they were not aware of any fair housing testing, and a majority did not know enough about current levels of fair housing testing to evaluate them. Of those who did provide an assessment of current levels of fair housing testing, around 72 percent considered those levels inadequate.

Table VII.5
Fair Housing Activities
State of North Carolina
2015 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total	
Is there a training process available to learn about fair housing laws?	241	109	25	151	526	
Have you participated in fair housing training?	219	49	10	248	526	
Are you aware of any fair housing testing?	97	202	75	152	526	
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity?	156	89	3	126	152	526
Is there sufficient testing?	90	31	4	248	153	526

To give an indication of public understanding of fair housing law, respondents were asked to list classes of persons protected by fair housing laws at the federal or state level. Race and disability were offered as examples of protected classes in the question narrative, and respondents were encouraged to continue on and list other protected classes. As shown in Table VII.6 at right, respondents were generally aware that gender, religion, family status, and national origin were protected under fair housing laws: more than half of those who responded to the question correctly identified those groups. Around 44 percent of respondents also correctly identified color as a protected class. On the other hand, 31 percent of respondents identified age, and 21.3 percent identified sexual orientation, neither of which is protected under federal or state fair housing laws.

Table VII.6
Protected Classes

State of North Carolina
2015 Fair Housing Survey Data

Protected Class	Total
Religion	228
Gender	227
Family Status	195
National Origin	172
Color	139
Age	98
Sexual Orientation	67
Ethnicity	36
Disability	33
Income	21
Marital Status	21
Military	11
Race	11
Criminal History	5
Victims of Domestic Violence	5
Persons with AIDS/HIV	4
Ancestry	2
Other	91
Total	1,347

When asked if they were aware of any city or county fair housing ordinance, regulation, or plan, 60 respondents stated that they were, as shown in Table VII.7 below. However, a majority responded “no” or “don’t know” to this question.

Around 19 percent of respondents stated that they were aware of specific geographic areas with fair housing problems, with several respondents citing the more rural areas of the state.

Table VII.7
Local Fair Housing

State of North Carolina
2015 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any city or county fair housing ordinance, regulation, or plan?	60	114	117	235	526
Are there any specific geographic areas that have fair housing problems?	56	52	189	229	526

Finally, respondents were asked if they had any additional comments relating to any aspect of fair housing in the state. Topics addressed in that commentary were predictably wide-ranging, though there were some common themes: For example, a number of respondents cited issues relating to residents with disabilities, including the perceived failure to ensure an adequate supply of accessible housing or to ensure that housing providers provide reasonable accommodations or modifications where necessary. Other responses expressed concern about the level of enforcement of fair housing laws, with many considering such enforcement to be inadequate.

FAIR HOUSING FORUMS AND PUBLIC REVIEW MEETINGS

FAIR HOUSING FORUMS

The North Carolina Department of Commerce and the Department of Health and Human Services hosted a series of fair housing forum presentations from the 8th through the 10th of September 2015. The first meeting was held in Benson on the eighth, the second in Charlotte on the ninth, and the third in Hickory on the tenth, all at 10:00 in the morning. The purposes

of the fair housing forums were to present members of the public and stakeholders with findings from the AI process and to gain their perspective on the trends and issues identified.

Throughout each presentation, attendees engaged in discussions on a number of topics, including fair housing requirements that the Department of Commerce has established for local grantees to whom the Department directs CDBG funding, fair housing planning at the local level, lack of understanding of fair housing law and policy, fair housing challenges relating to income and disability, and methods to improve outreach efforts and promote participation in fair housing education and training sessions.

FAIR HOUSING PUBLIC REVIEW MEETING

During the public review period, which ran from October 5, 2015 to November 4, 2015, a draft of the AI was presented to the public for review and comment. On November 3, 2015, the State held an additional public review meeting to review the findings of the AI with stakeholders and citizens, as well as to discuss the identified impediments and proposed actions to address those impediments.

SUMMARY

During the 2015 AI process, the State sought the participation of residents and stakeholders through the 2015 Fair Housing Survey and a series of Fair Housing Forum presentations held in the state from the 8th through the 10th of September 2015.

Property managers and service providers accounted for relatively large shares of the 526 respondents to the 2015 North Carolina Fair Housing Survey, and most considered themselves to be at least somewhat familiar with fair housing laws. A majority of respondents were homeowners, though around 18 percent identified themselves as renters and 28.2 percent as “other”.

Respondents overwhelmingly agreed that fair housing laws serve a useful purpose, but were more divided on other aspects of fair housing law. A sizeable minority of respondents found fair housing laws to be difficult to understand or follow, and respondents were more or less evenly divided on the question of whether fair housing protections ought to be extended to other groups. Those who did favor including additional protections cited sexual orientation, income, and criminal history as protected classes. Just fewer than 30 percent of respondents felt that fair housing laws are not adequately enforced at present.

A majority of respondents were aware of available fair housing training opportunities, and 219 of the 526 respondents noted that they had participated in such training. Fewer respondents were aware of any fair housing testing, and those who weighed in on current levels of outreach, education, and testing tended to agree that those levels were insufficient.

In addition, the degree to which survey respondents were aware of which groups were protected under federal and state law varied considerably depending on the group in question. More than half of respondents, excluding missing responses, were aware that federal and state laws included fair housing protections based on gender, religion, family status, and national origin. Fewer respondents were aware that those laws also protect individuals based on their

color, and a number of respondents identified classes that are not protected under state or federal law, including age and sexual orientation.

Around 21 percent of respondents were aware of a local, i.e., city or county, fair housing ordinance, regulation, or plan. Around 19 percent of respondents felt that they could identify geographic areas with fair housing problems, with many citing rural areas of the state as an example.

The State encouraged public participation during the AI process through a series of Fair Housing Forum presentations, held in Benson, Charlotte, and Hickory from September 8th through 10th of 2015. These presentations had two purposes: The first was to present state residents and stakeholders with the most current findings to date from the AI process. The second was to encourage discussion on the trends and issues identified. Topics discussed during the forum presentations included fair housing requirements for local grantees, lack of understanding of fair housing law and policy, fair housing challenges relating to income and disability, and methods to improve outreach efforts and promote participation in fair housing education and training sessions.

Finally, the State sought the input of stakeholders and citizens during the public review process by holding a public review meeting on November 3, 2015. The purpose of this meeting was to review the AI findings and present the identified impediments to fair housing choice for discussion, along with the actions proposed to address those impediments.

SECTION VIII. SUMMARY OF FINDINGS

This AI reviews both the public and private sector contexts for housing markets in non-entitlement areas of the North Carolina, in order to determine the effects these forces have on housing choice. As part of that review, analysis of demographic, economic, and housing data provide background context for the environments in which housing choices are made. Demographic data indicate the sizes of racial and ethnic populations and other protected classes; economic and employment data show additional factors in influencing housing choice; and counts of housing by type, tenure, quality, and cost indicate the ability of the housing stock to meet the needs of the state's residents.

Once this contextual background analysis has been performed, detailed review of fair housing laws, cases, studies, complaints, and public involvement are better supported by the background information. The structure provided by local, state, and federal fair housing laws shapes the complaint and advocacy processes available in the state, as do the services provided by local, state, and federal agencies. Private sector factors in the homeownership and rental markets, such as home mortgage lending practices, have substantive influence on fair housing choice. In the public sector, policies and codes of local governments and a limited location of affordable rental units can significantly affect the housing available in each area, as well as neighborhood and community development trends. Complaint data and AI public involvement feedback further help define problems and possible impediments to housing choice for persons of protected classes, and confirm suspected findings from the contextual and supporting data.

Socio-Economic Context

The population of the state's non-entitlement areas has grown by an estimated 16.5 percent since 2000, according to the latest Census Bureau estimate released in 2014. Between the 2000 and 2010 Census counts, the state's non-entitlement population grew by around 673,000, with much of that growth attributable to an increase in the number of residents aged 55 and over. The largest percentage of the non-entitlement population was 35 to 54 years in age; however, that percentage fell over the decade from 30 to 28.6 percent of the total population. By contrast the share of the population aged 65 and older grew at over twice the rate of the overall population.

More than three-quarters of the state's non-entitlement residents were white in 2000 and 2010; nevertheless, white residents declined as a share of the population from 77.3 to 75.3 percent in the decade following 2000. Slow growth among the black population also contributed to a decline in the share of black non-entitlement residents of around one percentage point, and black residents represented 16.3 percent of the non-entitlement population in 2010. At the same time, the number of residents identifying as "other", or who belonged to two or more racial groups, more than doubled over the decade: together, these residents accounted for 5.5 percent of the population in 2010. Similarly, Hispanic residents of all races more than doubled in number and grew as a share of the non-entitlement population by over three percentage points. In 2010, the Hispanic population represented 6.9 percent of the total population.

Both Hispanic and black residents tended to account for larger shares of Census tract populations in the east of the state, particularly in the inner coastal plain. Black residents were generally more concentrated in the northern and southern portions of the coastal plain, with

Hispanic residents tending to concentrate in the central-inner coastal plain. There were also large concentrations of Hispanic residents observed in Census tracts near the center of the state, notably around Siler City and Sanford.

Residents with disabilities accounted for 22.9 percent of the non-entitlement population in 2000, and tended to be more highly concentrated in rural Census tracts than in more populous tracts closer to the state's entitlement areas. The same geographic pattern was observed in 2009-2013, when roughly 15.5 percent of the population was counted as living with some form of disability. Note that the definition of disability employed by the Census Bureau in 2000 differed considerably from the one employed in 2008 and later. For that reason, the Census Bureau discourages direct comparisons between the two, and this definitional change may account for much of the apparent drop in the disability rate between 2000 and 2009-2013.

Growth in the non-entitlement labor force has been uneven, but largely positive, since 1990. The number of employed persons has also shown positive growth in most of the years within the same time period. However, that growth was punctuated by two periods of significant declines in the number of people working, the first beginning after 2000 and the second beginning after 2007. The latter period saw a more substantial drop in the number of employed workers and a corresponding spike in the unemployment rate, which reached 11.7 percent in 2010. However, the unemployment rate has declined steadily since February of that year, notwithstanding marked seasonal variation in unemployment.

As one might expect, the decline in the number of employed persons after 2007 coincided with a decline in the number of full- and part-time jobs in the state as a whole. Recent years have also seen a marked fluctuation in inflation-adjusted earnings for the average worker, as well as the inflation-adjusted income of the average state resident.

In the years since 2000, larger shares of households have moved into higher income brackets, and lower-income households have shrunk as a share of households overall. Nevertheless, turbulence in the labor market has contributed to a marked increase in the poverty rate throughout the state's non-entitlement areas, which grew from 12.5 percent in 2000 to 17.7 percent by 2009-2013. In both years, poverty rates in rural Census tracts along the inner coastal plain tended to be higher than in central, more populous Census tracts. The same was true of Census tracts in the south and west of the state.

Growth in the housing stock of the state's non-entitlement areas outpaced growth in the number of households, resulting in a 43.5 percent growth in the number of vacant units between 2000 and 2010. However, occupied units still accounted for a large majority, or 83.8 percent, of housing units throughout that area at the end of the decade. A majority of those occupied housing units were occupied by the people who owned them; however, there was a marked shift toward rental occupancy over the decade. Units that were rented or sold but not occupied accounted for a smaller share of vacant units at the end of the decade, while the share of units available for sale or rent grew. "Other vacant" units accounted for nearly a quarter of vacant units throughout the state's non-entitlement areas in 2010. These units tend to be more problematic than vacant units overall, as they are not available to the market place and may contribute to blight where they are grouped in close geographic proximity to one another. Though it was coastal and western Census tracts that saw the highest overall vacancy

rates, “other vacant” units tended to represent a larger share of vacant units in central Census tracts, as well as those along the inner coastal plain.

As the housing stock grew between 2000 and 2009-2013, single-family housing units remained the dominant type of housing unit in the state’s non-entitlement areas; these units represented 71.1 percent of the housing stock in recent estimates. Mobile homes also represented a relatively large percentage of housing units, at 20.4 percent in 2009-2013. However, this share represents a decline of three-percentage points over 2000. Meanwhile, apartment units have come to account for a greater share of housing units: 4.6 percent in recent estimates, up from 3.6 percent in 2000.

Small households, or those including only one or two members, represented around 60 percent of all non-entitlement households, and this share grew over the decade. However, the state’s non-entitlement areas also experienced a notable increase in the number of larger households, or those with five members or more.

In spite of this growth in the number of larger households, the percentage of households considered to be overcrowded or severely overcrowded fell after 2000, representing 2.3 percent of households in 2009-2013. Housing units are considered to be overcrowded if they include more than one resident per room.

Additional housing problems identified in Census and American Community Survey data relate to incomplete plumbing and kitchen facilities in housing units. Fewer than one percent of households were affected by either problem, though the percentage of units with incomplete kitchen facilities ticked up slightly between 2000 and 2009-2013, from 0.5 to 0.6 percent.

A more common problem was cost-burdened households, and this was, unfortunately, a problem that impacted a larger percentage of households in 2009-2013 than in 2000. Housing costs consumed more than 31 to 50 percent of household income in nearly 17 percent of households in 2009-2013, and an additional 13.5 percent of households were spending more than half of their monthly income on housing costs. Generally speaking, rental households were more impacted by cost-burdening than owner-occupied households, even those that were still under mortgage. Housing costs tended to be higher along the coast, in western Census tracts bordering on Tennessee, and in Census tracts surrounding the state’s entitlement areas.

Review of Fair Housing Laws, Studies, and Cases

Residents of North Carolina’s non-entitlement areas are protected from discrimination in the housing market by federal and state laws. The Federal Fair Housing Act provides the foundation for fair housing enforcement throughout the United States, prohibiting discrimination in a wide range of housing transactions on the basis of race, color, religion, national origin, sex, familial status, and disability. North Carolina also prohibits discrimination on these same bases in the state Fair Housing Act, and also prohibits discrimination in land-use decisions on the basis that a prospective housing development will include affordable housing units.

Housing law and jurisprudence has evolved considerably since the FHA was first enacted in 1968. The Fair Housing Amendments Act of 1988 added additional protections, strengthened

the Act's relatively weak enforcement provisions, and gave the Department of Housing and Urban Development enhanced authority to enforce the Act. In addition, since the early 1970s the FHA has consistently been interpreted to apply to laws and policies that are apparently neutral with respect to protected class status, but which nevertheless "actually or predictably"⁷³ result in discrimination. In 2013, HUD finalized a rule formalizing its interpretation of discriminatory effects liability under the FHA.

That interpretation was reaffirmed in a June 25, 2015 Supreme Court decision in *Texas Department of Housing and Community Affairs v. Inclusive Communities Project, Inc.* That case originated in a lawsuit against the Texas Department of Housing and Community Affairs ("the Department") on the grounds that the process by which it awarded low income housing tax credits had the effect of concentrating affordable housing in areas with high concentrations of minority residents. In bringing the suit, the Inclusive Communities Project relied in part on the disparate impact theory, and it was that theory that the Department sought to challenge in asking the Supreme Court to hear the case. Ultimately, the Court held that individuals, businesses, and government agencies could be held liable for the disparate impacts of their policies.

Following on the heels of the Supreme Court decision, HUD announced a final rule significantly revamping its long-standing requirement to affirmatively further fair housing (AFFH). In developing and finalizing this rule, HUD has substantially revised the AFFH process by (1) replacing the analysis of impediments with the assessment of fair housing (AFH), (2) integrating fair housing planning into the consolidated planning process, and (3) providing a fair housing assessment tool and nationally standardized datasets, among other changes. Generally speaking, the new rule will apply to local entitlement jurisdictions that are due to begin their next five-year planning cycle in 2017 or later. For smaller entitlement jurisdictions, as well as states and insular areas, the new rule will apply to those set to begin their next planning cycle in 2018 or later. Until jurisdictions are required to submit an AFH, they are required to continue submitting analyses of impediments.

Under certain circumstances, the United States Department of Justice (DOJ) will file a fair housing complaint on behalf of residents who are suspected to have suffered a violation of fair housing law. The DOJ has filed six such complaints against housing providers throughout the state in the last ten years, one of which resulted in the largest monetary settlement ever assessed in a sexual harassment case brought under the Fair Housing Act, in which damages alone amounted to more than \$2.7 million. However, the DOJ complaints more commonly alleged discrimination on the basis of disability, often relating to failure to make reasonable accommodation or allow reasonable modifications.

In addition to the DOJ complaints, state agencies and organizations have also brought civil actions against housing providers, under state and federal law, for alleged discrimination in the housing market. Two of these cases related to land-use decisions, and one of them cited discrimination in land-use decisions based on the fact that a prospective development would consist of affordable units, a cause of action that is explicitly laid out in state, but not federal, fair housing law.

⁷³ *United States v. City of Black Jack, Missouri*, 508 F.2d 1179, 1184 (8th Cir. 1974) It was racial discrimination, specifically, that was at issue in this case.

Fair Housing Structure

North Carolina residents who believe that they have been subjected to illegal discrimination in the housing market may file a complaint with the US Department of Housing and Urban Development (HUD), which has a regional office in Atlanta, Georgia. However, because HUD has deemed the state fair housing law to be substantially equivalent to the Federal Fair Housing Act, HUD will generally refer complaints it receives from North Carolina residents to the North Carolina Human Relations Commission (NCHRC). The NCHRC, which enforces the North Carolina Fair Housing Act, collaborates with HUD under the Fair Housing Assistance Program (FHAP), under which the commission enforces state and federal fair housing laws, receiving reimbursement funding from HUD for its efforts.

In light of the fact that HUD has determined the federal and state Fair Housing Acts to be substantially equivalent, it is not surprising that HUD and the Human Relations Commission follow similar complaint procedures. North Carolina residents who wish to file a fair housing complaint with HUD or the Human Relations Commission may do so within a year of the most recent alleged violation at issue in the complaint. Once a complaint is lodged, HUD is required to complete the investigation within 100 days (the Commission has 90 days), unless it is impracticable to do so. During the investigation, HUD or the Commission will attempt to broker a conciliation agreement between the complainant and respondent (i.e., the person alleged to have committed the violation). If no agreement is reached, HUD or the Commission will determine whether or not the allegation amounts to a true instance of discrimination, and will issue a charge.

It is at this point that the procedures of HUD and the Human Relations Commission differ slightly. If the Commission determines that there is reasonable cause to believe that discrimination has occurred or will likely occur, it will require the two parties to attempt, where possible, to resolve the matter through conciliation or mediation before proceeding to an administrative hearing or civil action. Though HUD also attempts to resolve fair housing complaints through conciliation, the statutory conciliation process ends, at the federal level, when HUD determines whether or not the complaint has cause. If the HUD issues a charge of discrimination, the matter may proceed to an administrative hearing or civil action, depending on the wishes of the parties involved. The same is true of complaints filed with the Commission if the parties are unable to resolve the matter through conciliation.

Those who are found to have violated the state or Federal Fair Housing Act may be required to pay monetary damages and civil penalties, and to undertake a number of measures designed to prevent similar violations in the future, including training and the adoption of anti-discrimination policies.

The North Carolina Senate, in its version of the 2015 state budget, called for the elimination of the Human Relations Commission and the state Fair Housing Act. Though the Commission was not eliminated in the final version of the budget, passed in early September of 2015, it was designated for Continuation Review. The purpose of this review is to determine whether funding for the funds, agencies, or divisions designated will be continued, reduced, or eliminated. The Human Relations Commission, along with other agencies identified for

continuation review, are required to conduct those reviews and present preliminary findings by December 1, 2015. The final reports from the Continuation Review are due by April 1, 2016.

In addition to the federal and state governmental agencies discussed above, North Carolina residents are served by the Fair Housing Project of Legal Aid NC. In addition to providing complaint intake and fair housing testing, the organization also conducts research into fair housing and predatory lending in the state and provides outreach and education to residents and stakeholders throughout the state.

Fair Housing in the Private Sector

A number of factors affect the housing choices available to residents of North Carolina's non-entitlement areas: such factors include patterns in home purchase and small business lending, perceived and actual discrimination in the housing market, and policies and practices of individuals and businesses in the housing market. For the present study, assessment of these factors was undertaken through a review of lending data collected from the Federal Financial Institutions Examination Council (FFIEC); complaint data collected by federal and state agencies and organizations; and the 2015 State of North Carolina Fair Housing Survey.

Banks and other lending institutions handled 3.7 million loans in the state's non-entitlement areas from 2004 through 2013, of which 1.4 million were home-purchase loans. Around 84.2 percent of these home purchase loans were intended to finance the purchase of a home in which the applicant intended to live, and around 570,000 applicants successfully secured a new loan on a home.

However, 22.8 percent of home loan applications were denied between 2004 and 2013, and the rate of loan denials has gone up in recent years. Moreover, applicants were more likely to be denied if they were female than if they were male, black than if they were white, and Hispanic than if they were non-Hispanic. The gap between denial rates for female and male applicants, 7.6 percentage points on average, ranged from 4.5 to 13.2 percentage points, depending on the year, and has been relatively wide in recent years. The denial rate for black applicants, at 40.1 percent over the ten-year period, was more than twice that of white applicants. Similarly, Hispanic applicants faced a denial rate that was over nine percentage points higher than the denial rate for non-Hispanic applicants.

Credit history was a common reason for loan denials, as was the applicant's debt-to-income ratio, so it is no surprise that denial rates tended to fall as the income of the applicant rose. However, disparities in loan denial rates by sex, race, and ethnicity tended to persist even when income was taken into account. For example, black applicants earning \$60,000 to \$75,000 per year were still around twice as likely to be turned down as white applicants in the same income range. Meanwhile, the denial rate for Hispanic applicants in that income range was 19.4 percent, more than five percentage points higher than the denial rate for non-Hispanic applicants who were similarly situated with respect to income.

In some cases, successful loan applicants were issued loans with comparatively high annual percentage rates. These high-cost "HALs" represented 12.1 percent of loans issued from 2004 through 2013. HAL rates were considerably higher in 2005 and 2006, but have fallen dramatically since that time. By 2009, the HAL rate had fallen below 5 percent.

However, as was the case with denied home loan applications, borrowers in the state's non-entitlement areas were impacted differently by high-cost lending according to their race or ethnicity. Around 24 percent of loans issued to black borrowers over the ten-year period were HALs, compared to a HAL rate of 10.4 percent for white borrowers. Similarly, nearly 20 percent of loans issued to Hispanic borrowers were HALs, compared to a HAL rate of 11.2 percent for non-Hispanic borrowers.

Geographically speaking, residents of rural Census tracts were more likely to be denied a loan and, if they were successful in their loan application, to be issued high-cost loans. This was particularly true along the inner coastal plain, though denial rates and HAL rates generally tended to be higher in Census tracts that lay further from entitlement communities or the state's barrier islands.

Analysis of small business lending indicates that lenders were generally more active in middle- to high-income Census tracts, with relatively few small business loans or loan dollars going to low- and moderate-income Census tracts. Geographically, this generally meant that small business lending tended to focus on areas around the state's entitlement jurisdictions and coastal areas, and to bypass more sparsely populated rural tracts in the north and south of the state, and especially along the inner coastal plains.

Fair housing complaints filed with the Department of Urban Development and the North Carolina Human Relations Commission most commonly cited perceived racial discrimination, followed by discrimination on the basis of disability. Disability-based discrimination figured in a majority of complaints filed with the Fair Housing Project, which has accepted many disability-related complaints that are not ultimately filed with HUD or the North Carolina Human Relations Commission, either because they represent ongoing litigation or because they are resolved before the issue rises to the level of formal complaint. Discrimination in the rental housing market figured prominently among HUD complaints, as did failure to make reasonable accommodation. HUD and NCHRC complaints were rarely found to have cause; more commonly they were resolved through settlement or conciliation. However, a majority of HUD complaints were found to be without cause, as were around 48 percent of complaints filed with the Human Relations Commission.

Responses of state residents and stakeholders to the 2015 North Carolina Fair Housing Survey indicate that respondents were more likely to be aware of potential fair housing issues and questionable practices in the rental housing market and mortgage and home lending industry than in other areas. Those who elaborated on their responses by providing additional commentary highlighted perceived discrimination on the basis of race, sex, and familial status, as well as the challenges stemming from an overall lack of affordable housing.

Fair Housing in the Public Sector

Fair housing choice in the state's non-entitlement areas is impacted by a number of factors in the public sector, including the extent and distribution of publicly-subsidized housing units; land-use and zoning laws, policies, and practices; and the provision of government services, among others.

Assisted units, whether subsidized directly by HUD or through low-income housing tax credits, were widespread in the state, though they tended to be clustered along major transportation corridors and around cities.

Respondents to the 2015 Fair Housing Survey were more likely to state an awareness of fair housing issues when considering land-use policies, zoning laws, and access to government services than other areas of the public sector. Over 17 percent of respondents maintained that they were aware of potential barriers to fair housing choice in land-use decisions, while over a fifth cited questionable practices in zoning laws. In both cases, respondents who provided additional commentary cited local policies that serve to limit the placement of affordable housing units to low-income areas of the community. Finally, around one third of respondents highlighted limited access to government services, with many citing a need for greater access to public transit and employment services.

Public Involvement

During the 2015 AI process, the State sought the participation of residents and stakeholders through the 2015 Fair Housing Survey and a series of Fair Housing Forum presentations held in the state from the 8th through the 10th of September 2015.

Property managers and service providers accounted for relatively large shares of the 526 respondents to the 2015 North Carolina Fair Housing Survey, and most considered themselves to be at least somewhat familiar with fair housing laws. A majority of respondents were homeowners, though around 18 percent identified themselves as renters and 28.2 percent as “other”.

Respondents overwhelmingly agreed that fair housing laws serve a useful purpose, but were more divided on other aspects of fair housing law. A sizeable minority of respondents found fair housing laws to be difficult to understand or follow, and respondents were more or less evenly divided on the question of whether fair housing protections ought to be extended to other groups. Those who did favor including additional protections cited sexual orientation, income, and criminal history as protected classes. Just fewer than 30 percent of respondents felt that fair housing laws are not adequately enforced at present.

A majority of respondents were aware of available fair housing training opportunities, and 219 of the 526 respondents noted that they had participated in such training. Fewer respondents were aware of any fair housing testing, and those who weighed in on current levels of outreach, education, and testing tended to agree that those levels were insufficient.

In addition, the degree to which survey respondents were aware of which groups were protected under federal and state law varied considerably depending on the group in question. More than half of respondents, excluding missing responses, were aware that federal and state laws included fair housing protections based on gender, religion, family status, and national origin. Fewer respondents were aware that those laws also protect individuals based on their color, and a number of respondents identified classes that are not protected under state or federal law, including age and sexual orientation.

Around 21 percent of respondents were aware of a local, i.e., city or county, fair housing ordinance, regulation, or plan. Around 19 percent of respondents felt that they could identify geographic areas with fair housing problems, with many citing rural areas of the state as an example.

The State encouraged public participation during the AI process through a series of Fair Housing Forum presentations, held in Benson, Charlotte, and Hickory from September 8th through 10th of 2015. These presentations had two purposes: The first was to present state residents and stakeholders with the most current findings to date from the AI process. The second was to encourage discussion on the trends and issues identified. Topics discussed during the forum presentations included fair housing requirements for local grantees, lack of understanding of fair housing law and policy, fair housing challenges relating to income and disability, and methods to improve outreach efforts and promote participation in fair housing education and training sessions.

Finally, the State sought the input of stakeholders and citizens during the public review process by holding a public review meeting on November 3, 2015. The purpose of this meeting was to review the AI findings and present the identified impediments to fair housing choice for discussion, along with the actions proposed to address those impediments.

SECTION IX. IMPEDIMENTS AND SUGGESTED ACTIONS

IMPEDIMENTS TO FAIR HOUSING CHOICE AND SUGGESTED ACTIONS

Private Sector Impediments, Suggested Actions, and Measurable Objectives

Impediment 1: Discrimination in the rental housing market on the basis of race and disability. This impediment was identified through review of responses to the 2015 North Carolina Fair Housing Survey and complaints filed with the Department of Housing and Urban Development (HUD), and in consultation with participants in the 2015 Fair Housing Forum meetings.

Action 1.1: In partnership with the Housing Finance Agency (HFA), enhance education and outreach efforts targeting consumers and providers of housing in the state's non-entitlement areas.

Measurable Objective 1.1: The number of outreach and education sessions offered and the number of participants.

Impediment 2: Lack of reasonable accommodation and modification. This impediment was identified through review of responses to the 2015 North Carolina Fair Housing Survey and complaints filed with the Department of Housing and Urban Development (HUD), and in consultation with participants in the 2015 Fair Housing Forum meetings.

Action 2.1: In partnership with the HFA, enhance targeted outreach and education efforts for housing providers, highlighting legal rights and obligations relating to reasonable accommodation and modification.

Measurable Objective 2.1: The number of outreach and education and action sessions offered and the number of participants.

Impediment 3: Lack of understanding of fair housing law in rural areas of the state, both among housing consumers and housing providers. This impediment was identified in review of responses to the 2015 North Carolina Fair Housing Survey and in consultation with participants in the 2015 Fair Housing Forum meetings.

Action 3.1: In partnership with the HFA, enhance outreach and education efforts targeting consumers and providers of housing in rural areas of the state, focusing on rights and obligations under the Federal Fair Housing Act and the North Carolina Fair Housing Act.

Measurable Objective 3.1: The number of outreach and education and action sessions offered and the number of participants.

Impediment 4: Black and Hispanic residents experience higher rates of home purchase loan denials than white and non-Hispanic residents, leading to lower rates of homeownership. This impediment was identified through a review of data gathered under the Home Mortgage Disclosure Act (HMDA) and responses to the 2015 North Carolina Fair Housing Survey.

Action 4.1: In partnership with the HFA, and with the participation of the Department of Commerce, convene a homeownership workgroup to identify ways to

overcome disproportionately low homeownership rates among black and Hispanic residents. Task the workgroup with the identification of potential avenues to improve financial literacy, address lack of understanding of credit, loans, and lending, and any other challenges the workgroup may uncover.

Measurable Objective 4.1: The establishment of the homeownership workgroup, the identification of challenges to homeownership, and suggestions of ways to improve homeownership rates among black and Hispanic residents.

Public Sector Impediments, Suggested Actions, and Measurable Objectives

Impediment 1: Limited fair housing infrastructure serving rural state residents. This impediment was identified through a review of the organizations and agencies dedicated to promoting fair housing choice in the state, as well as in consultation with the Fair Housing Project of Legal Aid NC.

Action 1.1: In partnership with the HFA and Department of Commerce, contract with state and local Fair Housing Initiative Program (FHIP) participants to conduct outreach and education activities in rural areas of the state.

Measurable Objective 1.1: The hiring of FHIP organizations and the number of outreach and education sessions that they conduct.

Impediment 2: Limited understanding of duty to affirmatively further fair housing. This impediment was identified through review of responses to the 2015 North Carolina Fair Housing Survey and in consultation with participants in the 2015 Fair Housing Forum meetings.

Action 2.1: Require prospective sub-grantees of Community Development Block Grant (CDBG) funding to complete fair housing training. As funding applications from local jurisdictions are considered and scored, award additional points to those whose officials have completed fair housing training.

Measurable Objective 2.1: The establishment of a fair housing training requirement for local CDBG sub-grantees and the development of additional scoring criteria for local jurisdictions whose officials complete fair housing training.

Action 2.2: Require a letter from sub-grantees certifying that they will administer CDBG funding in a manner consistent with the findings and objectives of the state AI.

Measurable Objective 2.2: The number of letters received from CDBG sub-grantees.

Action 2.3: In lieu of requiring local jurisdictions to complete an AI, employ resources to conduct fair housing activities, including outreach, education, and training.

Measurable Objective 2.3: The amount of money and other resources dedicated to providing fair housing outreach, education, and training.

Action 2.4: The DOC will continue to monitor fair housing activities for grantees.

Measurable Objective 2.4: Records of fair housing activities conducted by local jurisdictions.

Impediment 3: Lack of understanding of fair housing law by units of local government in non-entitlement areas. This impediment was identified through a review of responses to the 2015 North Carolina Fair Housing Survey and in consultation with participants in the 2015 Fair Housing Forum meetings.

Action 3.1: The Department of Commerce will contract with state and local FHIP organizations to provide fair housing outreach, education, and training to local government officials.

Measurable Objective 3.1: The number of FHIP organizations hired, the number of fair housing outreach, education, and training sessions conducted, and the number of units of local government whose officials participate in those sessions.

SECTION X. GLOSSARY

Accessible housing: Housing designed to allow easier access for physically disabled or vision impaired persons.

ACS: American Community Survey

AI: Analysis of Impediments to Fair Housing Choice

AMI: Area median income

BEA: Bureau of Economic Analysis

BLS: Bureau of Labor Statistics

CDBG: Community Development Block Grant

Census tract: Census tract boundaries are updated with each decennial census. They are drawn based on population size and ideally represent approximately the same number of persons for each tract.

Consolidated Plan: Consolidated Plan for Housing and Community Development

Cost burden: Occurs when a household has gross housing costs that range from 30.1 to 50 percent of gross household income.

CRA: Community Reinvestment Act

Disability: A lasting physical, mental, or emotional condition that makes it difficult for a person to conduct daily activities of living or impedes him or her from being able to go outside the home alone or to work.

Disproportionate share: Exists when the percentage of a population is 10 percentage points or more above the study area average.

DOJ: U.S. Department of Justice

ESG: Emergency Shelter Grants program

Fannie Mae: Federal National Mortgage Association (FNMA), a government-sponsored enterprise that purchases mortgages from lenders and repackages them as mortgage-backed securities for investors.

Family: A family is a group of two people or more related by birth, marriage, or adoption and residing together.

FFIEC: Federal Financial Institutions Examination Council

FHAP: Fair Housing Assistance Program

FHEO: Fair Housing and Equal Opportunity

FHIP: Fair Housing Initiative Program

Floor area ratio: The ratio of the total floor area of a building to the land on which it is situated, or the limit imposed on such a ratio.

Freddie Mac: Federal Home Loan Mortgage Corporation (FHLMC), a government-sponsored enterprise that purchases mortgages from lenders and repackages them as mortgage-backed securities for investors.

GAO: U.S. Government Accountability Office

Gross housing costs: For homeowners, gross housing costs include property taxes, insurance, energy payments, water and sewer service, and refuse collection. If the homeowner has a mortgage, the determination also includes principal and interest payments on the mortgage loan. For renters, this figure represents monthly rent and electricity or natural gas energy charges.

HAL: High annual percentage rate (APR) loan, defined as more than three percentage points higher than comparable treasury rates for home purchase loans, or five percentage points higher for refinance loans.⁷⁴

HMDA: Home Mortgage Disclosure Act

HOME: HOME Investment Partnerships

HOPWA: Housing Opportunities for Persons with AIDS

Household: A household consists of all the people who occupy a housing unit. A house, an apartment or other group of rooms, or a single room, is regarded as a housing unit when it is occupied or intended for occupancy as separate living quarters; that is, when the occupants do not live with any other persons in the structure and there is direct access from the outside or through a common hall.

Housing problems: Overcrowding, incomplete plumbing or kitchen facilities, or cost burdens

HUD: U.S. Department of Housing and Urban Development

Incomplete kitchen facilities: A housing unit is classified as lacking complete kitchen facilities when any of the following are not present: a sink with piped hot and cold water, a range or cook top and oven, and a refrigerator.

Incomplete plumbing facilities: A housing unit is classified as lacking complete plumbing facilities when any of the following are not present: piped hot and cold water, a flush toilet, and a bathtub or shower.

Labor force: The total number of persons working or looking for work

MFI: Median family income

Mixed-use development: The use of a building, set of buildings, or neighborhood for more than one purpose.

MSA: Metropolitan Statistical Area

NIMBYism: "Not in my backyard" mentality among community members, often in protest of affordable or multi-family housing.

Other vacant units: Housing units that are not for sale or rent

Overcrowding: Overcrowding occurs when a housing unit has more than one to 1.5 persons per room.

Poverty: The Census Bureau uses a set of money income thresholds that vary by family size and composition to determine who is in poverty. If a family's total income is less than the family's threshold, then that family and every individual in it is considered in poverty. The official poverty thresholds do not vary geographically, but they are updated for inflation using Consumer Price Index (CPI-U). The official poverty definition uses money income before taxes and does not include capital gains or noncash benefits (such as public housing, Medicaid, and food stamps).

Predatory loans: As defined by the Predatory Lending Consumer Protection Act of 2002 as well as the Home Owner Equity Protection Act (HOEPA), loans are considered predatory based on:

1. If they are HOEPA loans;⁷⁵
2. Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans); and
3. Presence of HALs. For full definition, see **HAL**.

Protected Class: Group of people protected from discrimination and harassment. North Carolina residents are protected from housing discrimination based on race, sex, religion,

⁷⁴ 12 CFR Part 203, http://www.ffiec.gov/hmda/pdf/regc_020702.pdf

⁷⁵ Loans are subject to the HOEPA if they impose rates or fees above a certain threshold set by the Federal Reserve Board. "HMDA Glossary." <http://www.ffiec.gov/hmda/glossary.htm#H>

familial status, disability, national origin, and color. In addition, state law prohibits discrimination against affordable housing in land-use decisions.

Public housing: Public housing was established to provide decent and safe rental housing for eligible low-income families, the elderly, and persons with disabilities.

RDA: Redevelopment agency

Severe cost burden: Occurs when gross housing costs represent 50.1 percent or more of gross household income.

Severe overcrowding: Occurs when a housing unit has more than 1.5 persons per room.

Steering: Actions of real estate agents or landlords to discourage a prospective buyer or tenant from seeing or selecting properties in certain areas due to their racial or ethnic composition.

Tenure: The status by which a housing unit is held. A housing unit is "owned" if the owner or co-owner lives in the unit, even if it is mortgaged or not fully paid for. A cooperative or condominium unit is "owned" only if the owner or co-owner lives in it. All other occupied units are classified as "rented," including units rented for cash rent and those occupied without payment of cash rent.

APPENDICES

The following sections present additional data prepared in development of the State of North Carolina Analysis of Impediments to Fair Housing Choice.

A. COMMUNITY REINVESTMENT ACT DATA

Table A.1
Small Business Loans Originated: \$100,000 or Less by Tract MFI
 Non-Entitlement Areas of North Carolina
 2000–2013 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	285	10,486	52,974	13,433	0	77,178
2001	318	10,920	53,554	13,791	2	78,585
2002	445	14,210	66,847	17,504	4	99,010
2003	484	13,926	74,180	21,248	0	109,838
2004	484	14,484	75,968	21,639	0	112,575
2005	448	15,413	83,743	23,615	0	123,219
2006	483	18,733	107,113	33,620	0	159,949
2007	545	19,644	114,865	36,753	0	171,807
2008	402	14,777	86,165	27,409	0	128,753
2009	191	7,194	38,836	12,244	0	58,465
2010	166	6,166	33,919	11,141	0	51,392
2011	188	6,768	38,982	13,087	0	59,025
2012	1,216	9,611	35,602	18,490	12	64,931
2013	1,226	8,834	32,319	17,571	14	59,964
Total	6,881	171,166	895,067	281,545	32	1,354,691
Loan Amount (\$1,000s)						
2000	4,300	164,896	771,858	206,672	0	1,147,726
2001	5,620	174,611	843,318	227,374	8	1,250,931
2002	7,069	215,827	948,648	263,076	29	1,434,649
2003	8,325	213,773	1,046,070	304,293	0	1,572,461
2004	7,809	222,641	1,109,954	317,332	0	1,657,736
2005	6,363	221,347	1,101,138	320,717	0	1,649,565
2006	6,247	237,838	1,277,145	396,030	0	1,917,260
2007	8,091	252,495	1,388,632	444,073	0	2,093,291
2008	5,633	200,717	1,071,371	333,278	0	1,610,999
2009	4,173	136,794	665,519	203,056	0	1,009,542
2010	3,408	114,112	546,455	172,186	0	836,161
2011	4,479	117,780	624,831	206,920	0	954,010
2012	23,195	147,625	513,669	260,885	72	945,446
2013	23,836	141,492	498,151	263,548	176	927,203
Total	118,548	2,561,948	12,406,759	3,919,440	285	19,006,980

Table A.2
Small Business Loans Originated: \$100,001 to \$250,000 by Tract MFI
 Non-Entitlement Areas of North Carolina
 2000–2013 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	21	572	2,636	712	0	3,941
2001	32	724	3,571	1,064	0	5,391
2002	24	773	3,938	1,237	0	5,972
2003	48	953	4,391	1,520	0	6,912
2004	42	959	4,551	1,403	0	6,955
2005	31	851	4,139	1,283	0	6,304
2006	32	919	4,290	1,393	0	6,634
2007	27	943	4,114	1,393	0	6,477
2008	27	867	3,797	1,314	0	6,005
2009	29	694	3,163	1,025	0	4,911
2010	32	525	2,358	764	0	3,679
2011	25	570	2,404	790	0	3,789
2012	133	671	1,941	978	0	3,723
2013	113	679	2,015	1,045	2	3,854
Total	616	10,700	47,308	15,921	2	74,547
Loan Amount (\$1,000s)						
2000	3,581	98,540	439,033	122,482	0	663,636
2001	5,793	125,693	606,153	183,991	0	921,630
2002	4,301	131,819	669,950	209,320	0	1,015,390
2003	8,578	166,623	744,922	263,631	0	1,183,754
2004	7,084	166,367	779,480	243,114	0	1,196,045
2005	5,494	149,899	706,006	226,643	0	1,088,042
2006	5,322	161,056	740,553	249,238	0	1,156,169
2007	4,550	166,042	710,806	244,987	0	1,126,385
2008	4,705	153,771	661,563	230,999	0	1,051,038
2009	5,415	120,244	555,261	180,911	0	861,831
2010	5,442	92,685	408,161	131,442	0	637,730
2011	4,688	101,096	415,374	139,240	0	660,398
2012	23,841	116,371	337,258	170,769	0	648,239
2013	20,765	119,480	351,193	184,011	400	675,849
Total	109,559	1,869,686	8,125,713	2,780,778	400	12,886,136

Table A.3
Small Business Loans Originated: More than \$250,000 by Tract MFI
 Non-Entitlement Areas of North Carolina
 2000–2013 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	11	351	1,630	545	0	2,537
2001	26	471	2,487	827	0	3,811
2002	25	642	2,778	944	0	4,389
2003	36	788	3,443	1,327	0	5,594
2004	48	788	3,339	1,315	0	5,490
2005	38	671	3,180	1,219	0	5,108
2006	38	733	3,281	1,288	0	5,340
2007	29	722	3,351	1,313	0	5,415
2008	25	776	3,295	1,323	0	5,419
2009	16	614	2,555	968	0	4,153
2010	14	452	1,905	675	0	3,046
2011	14	544	2,132	825	0	3,515
2012	107	610	1,833	1,002	0	3,552
2013	101	642	1,900	1,017	0	3,660
Total	528	8,804	37,109	14,588	0	61,029
Loan Amount (\$1,000s)						
2000	5,778	178,844	799,239	270,476	0	1,254,337
2001	15,094	231,611	1,237,716	410,260	0	1,894,681
2002	11,025	333,430	1,392,238	474,916	0	2,211,609
2003	16,986	411,995	1,775,046	691,888	0	2,895,915
2004	22,333	398,496	1,657,171	677,611	0	2,755,611
2005	17,298	341,552	1,592,898	641,024	0	2,592,772
2006	19,342	375,001	1,631,319	668,612	0	2,694,274
2007	12,854	366,605	1,693,699	682,694	0	2,755,852
2008	11,715	401,021	1,662,622	694,679	0	2,770,037
2009	8,665	318,592	1,305,531	503,976	0	2,136,764
2010	7,619	230,129	952,361	345,287	0	1,535,396
2011	7,557	284,691	1,084,869	425,563	0	1,802,680
2012	57,587	302,101	945,189	512,630	0	1,817,507
2013	53,292	338,196	966,530	531,777	0	1,889,795
Total	267,145	4,512,264	18,696,428	7,531,393	0	31,007,230

Table A.4
Small Business Loans to Businesses with Gross Annual Revenues of Less Than
\$1 Million by Tract MFI
 Non-Entitlement Areas of North Carolina
 2000–2012 CRA Data

Year	<50% MFI	50.1-80% MFI	80.1-120% MFI	>120% MFI	Missing MFI	Total
Number of Loans						
2000	133	5,968	26,509	6,622	0	39,232
2001	192	6,825	31,654	8,232	2	46,905
2002	175	6,671	29,603	7,551	0	44,000
2003	218	7,181	37,117	10,592	0	55,108
2004	211	7,526	38,898	10,705	0	57,340
2005	208	8,161	45,286	12,949	0	66,604
2006	217	8,676	50,072	14,923	0	73,888
2007	235	9,409	54,411	16,715	0	80,770
2008	172	6,647	36,097	10,987	0	53,903
2009	109	4,336	21,562	6,258	0	32,265
2010	106	3,482	18,136	5,676	0	27,400
2011	118	4,046	22,835	7,867	0	34,866
2012	690	5,056	18,160	10,127	3	34,036
2013	667	4,865	18,102	10,624	5	34,263
Total	3,451	88,849	448,442	139,828	10	680,580
Loan Amount (\$1,000s)						
2000	7,290	257,605	1,205,458	369,744	0	1,840,097
2001	15,841	323,764	1,607,710	499,853	8	2,447,176
2002	13,291	397,538	1,798,862	583,746	0	2,793,437
2003	16,585	446,590	2,121,831	765,630	0	3,350,636
2004	13,780	452,985	2,166,919	761,760	0	3,395,444
2005	12,863	374,238	2,047,109	704,436	0	3,138,646
2006	12,705	402,637	2,120,323	763,096	0	3,298,761
2007	11,928	404,281	2,101,172	744,384	0	3,261,765
2008	11,780	369,447	1,742,508	681,185	0	2,804,920
2009	8,980	327,684	1,520,954	520,269	0	2,377,887
2010	9,367	211,119	1,075,822	384,179	0	1,680,487
2011	8,925	256,344	1,126,871	442,164	0	1,834,304
2012	54,673	270,491	919,029	535,242	35	1,779,470
2013	37,225	247,003	828,089	500,928	52	1,613,297
Total	235,233	4,741,726	22,382,657	8,256,616	95	35,616,327

B. FAIR HOUSING SURVEY OPEN QUESTIONS

FEDERAL, STATE, AND LOCAL LAWS

Table B.1

Where would you refer someone if they felt that their fair housing rights had been violated?

The State of North Carolina
2015 Fair Housing Survey Data

Comments:
A fair housing center or legal aid
A lawyer
A supervisor
ABCRC
ABCRC, NAACP, ABIPA
ACLU
An attorney
An attorney or I would look up fair housing online for resources
another state
Asheville Buncombe Community Relations Council
Asheville Buncombe Community Relations Council; Pisgah Legal Services
Asheville Buncombe Community Relations Council. They would then guide the complainant through the process.
Asheville Buncombe County Community Relations
Asheville-Buncombe Community Relations Council
Atlanta
Attorney General
atty generals office, real estate board
Call the Fair Housing Office nearest me, or write/call HUD and file a Housing Discrimination Complaint, or go online to fill out & submit the form.
Cape Fear Housing Coalition
Charlotte city/county government
City of Durham Human Relations Department
City of Durham, City Council
City of WS Dept. of Human Relations
City of WS' Human Relations, HUD
City staff
Community Development at City of W-s
Community Relations Committee of Legal Aid
Congress Representative
Consumer Financial Protection Bureau
Department of Commerce
Department of Housing and Urban Development
Department of HUD and the Department of Justice, state and federal.
Depends if there is a local entity I would initially refer them there, most often to HRC.
Depends on the circumstance.
Depends where they live, what ordinances are in force, If good city ordinances, a city office of fair housing. If not maybe legal aid or other lawyer resource. Or in some circumstances just address directly with property management office -- bring in info about fair housing. Also some cities have housing coliation type agencies.
dept of HUD
Dept of HUD
DHHS
don't know
Don't know
Don't know. Possibly Roy Cooper.
don'tknow
DSS
Duke Legal Clinic
Duke Legal project
Duke University Law Center
EEOC
EHOC
Fair Housing / legal aid
Fair Housing and Equal Opportunity national hotline at 1-800-424-8590
Fair Housing Complaints with HUD and Legal Aid
Fair housing HUD department for complaints.
Fair Housing Project toll-free number
fairhousingnc.org
FHAP or FHIP agencies
FHEO
Fiar Housing Office
File a complaint to HUD

Follow chain of command and help them file a grievance
 good question?
 Google (I work in an office away from people, this never comes up for me by the way)
 Greensboro Housing Coalition
 Greenville Human Relations Council and HUD
 have no idea
 HC Human Relations Council
 Housing Assistance
 housing authority
 Housing Authority
 Housing Coalition
 Housing Counseling Agency
<https://portalapps.hud.gov/AdaptivePages/HUD/complaint/complaint-details.htm>
 hud
 Hud
 HUD
 HUD 800-669-9777 http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/complaint-process
 HUD Human Relations Commission
 HUD - 1-800-669-9777 and the local organization that handles Fair Housing.
 HUD - Hud provides a HUD Discrimination complaint form that can be downloaded from HUD's website
 HUD 1-800-669-9777
 HUD 800 number
 HUD Fair Housing
 HUD Fair Housing Complaint website
 HUD fair housing web site
 HUD Fair housing, legal aide
 HUD Greensboro
 HUD houseing counselor
 HUD office
 Hud or DOJ
 HUD or legal aid
 HUD or Legal Aide
 HUD or NC Legal aid
 HUD or State HRC or a FHAP
 HUD or the NC Fair Housing Commission
 HUD or to Legal Aid of the Southern Piedmont
 HUD or with state or local fair housing enforcement agencies
 HUD website
 HUD website.
 HUD, City
 HUD, Human Relations Commission
 HUD, Legal Aid
 HUD, local housing authority, attorney
 HUD, NCREC, NC Human Relation Commission
 HUD, Office of Fair Housing & Equal Opportunity
 HUD, State Housing Relations Commission, NC Justice Center, NC Legal Aid
 HUD: 800-669-9777 or Legal Aid Of NC Fair Housing Project: 855-797-FAIR (3247)
 HUD?
 hud.gov
 HUD.gov
 HUD.gov Local housing agency State housing agency
 HUD.GOV US Dept. of HUD
 HUD/ Secretary of Fair Housing
 HUMAN RELATION COUNCIL
 Human Relations Commission
 Human Relations Commission (local or state)
 Human Relations Commission of City of Winston-Salem
 Human relations commission or HUD
 Human Relations Council or Legal Aid
 Human Relations Department
 Human Relations dept with the City.
 Human rights commission
 I don't know.
 I don't really know.
 I would have them call the local housing authority
 I would have them call this number Toll Free: 1-866-324-7474
 I would look on line for a fair housing phone number
 I would look up fair housing on line to find out where
 I would refer them back to the agency that is assisting them with housing,
 I would suggest they go online.
 I'd have to look online
 I'm not sure
 It depends on where the violation occurred. HUD 800-669-9777 Human Relations Commission 919-807-4420

Legal advice
 legal aid
 Legal aid
 Legal Aid
 Legal Aid and Housing Counseling Agencies.
 Legal Aid and/or Fair Housing Complaint officer for Jacksonville, NC located at City Hall.
 Legal Aid of NC
 Legal Aid of NC.
 Legal Aid of North Carolina
 Legal Aid or Disability Rights
 Legal Aid or help them check the HUD web site
 Legal Aid, City, fair housing project
 Legal Aid, HUD
 Legal Aid, local government official, NC Human Rights Department
 Legal Aid's Housing Project
 Legal Aid/ Fair Housing Project
 Legal Aide and/or HUD office out of Atlanta. New Hanover County use to have a Human Relations Department, but it was eliminated.
 legal services
 Legal Services or a lawyer
 Local Community Development Department Department of HUD
 Local Fair Housing Office or HUD Office
 Local fair housing office or to HUD
 local government
 Local government contact person or Fair Housing at state level
 local government housing office, public housing office, NC Human relations commission, HUD online complaint form
 Local Governments, HUD website, Human Relations Commission, Legal Aid
 local HUD office
 Local HUD office
 Local HUD Office
 local Human Relations Commission
 Local Human Relations Commission
 local legal aid
 local legal aid services
 Local or State Fair Housing Agency
 Local or state human relations commission
 Locally to our Legal AID, the City of Wiston-Salem, HUD
 Locally to the Fair Housing office in the Gaston Cocounty government
 Look online
 Manager.
 Mecklenburg County human relations commitee
 My Corporate office first
 NC COALITION TO END HOMELESSNES
 NC Department of Adminsitration Housing Complaint form (online)
 NC Disability Rights, HUD
 NC Fair Housing
 NC housing commission
 NC Housing Finance Agency
 NC HUD Greensboro Office or City/County Human Rights Department
 NC Human Relations Commission
 NC HUMAN RELATIONS COMMISSION
 NC Human Relations Commission NC Fair Housing Project HUD
 NC Human Relations Commission unless the local government has a local FH ordinance. If the complaint comes from an active HUD project area, then it must be dealt with by that local government
 NC Human Relations Commission/HUD
 NC Human Relations Council
 NC Human Relations of their county
 NC Human Rights Commission
 NC Human Rights Commission, HUD
 NC Legal Aid
 NCHFA
 NCHFA, HUD, EEOC
 no idea
 No idea
 North Carolina Fair Housing
 North Carolina Fair Housing. Not really sure. I would find the right source.
 North Carolina Human Relations Commission
 North Carolina Human Relations Commission or Legal Aid
 North Carolina Real Estate Commission
 Not sure
 Office of Fair Housing, U.S. Dept. of HUD or local Human Relations Department
 Orange County Human rights office in Hillsborough
 pishgah legal

Pisgah legal or the HUD website
 Pisgah Legal Services
 Private attorney
 Probably Google it, and try to find a Housing office, or call Sarah Lancaster and ask her.
 Realtors Association and U S Dept of HUD
 Social Services
 speak with Hud
 state
 State and/or Federal housing authorities
 State Attorney General's office
 State DHHS
 State Level Leadership
 State of North Carolina and file a grievance
 State or Federal fair housing contact number
 State or Federal Fair Housing office
 The City of Durham's Community Development department
 The City of Greensboro's Human Relations Department and/or HUD.
 The fair housing authority, phone # or website
 The HUD website
 The internet to find a local agency.
 The local housing authority
 The local HUD office
 The local office of Fair Housing and Equal Opportunity
 the state
 Their county human rights commission or community development department. NC Fair Housing Center
 To a housing advocacy organization that investigates such issues or HUD.
 To an attorney familiar with Fair Housing law
 To HUD's website for filing a complaint (or give them the phone number for complaint dept.)
 To Legal Aid
 To our 504 coordinator
 To our fair housing complaint officer
 To our local HUD agency or to the NC offices of HUD.
 to t he fair housing office in the county they lived
 To the Asheville-Buncombe Community Relations Council.
 To the NC Human Relations Commission, unless the local govt has a FH Ordinance or an existing FH plan (and they live in the CDBG project area)
 U S Department of Housing and Urban Development
 U.S Department of Housing and Urban Development, Assistance Secretary for Fair Housing and Equal Opportunity, Washington, DC 20410 1-800-669-9777
 U.S. Dept. of Fair Housing and Urban Development
 Unknown
 US Department of Housing and Urban Development
 Us Department of Housing and Urban Development.
 US DEPT OF HOUSING -- HUD
 US Dept of housing and urban development
 US Dept of Justice or state or local Fair Housing Agency
 US Dept. of Housing
 USDA or HUD
 USDA Website
www.doa.nc.gov/hrc/fairhousing.aspx
www.hud.gov/fairhousing and will assist the consumer when needed with filing the complaint ?
 yes
 Yes
 Yes, but due to the lack of enforcement agency in my area, most will not follow through. There is a barrier that exists between our most vulnerable populations and fair housing enforcement here.

Table B.2
What "Other" type of Tenure are you?

The State of North Carolina
 2015 Fair Housing Survey Data

Comments:
site manager Administrator for property management company. Advocate assisting clients to find suitable housing affordable housing nonprofit developer Affordable Housing Planner agency Agency that assists homeless DV clients with housing Agent agent for property owner Apartment Property Manager for elderly & disabled apt complex owner/management (landlord)

Assistant Community Manager
 Assisted Housing Director
 both i own in Rocky Mount and I rent in New Bern
 Business - non profit
 Business owner
 case manager
 Case Manager
 Case Manager for Rapid Re-Housing Program
 case manager for Rapid Rehousing program
 CDC
 City Council Member, Chair of Housing and Community Development Committee
 Community Development
 Community Manager
 Community Organizer
 community services
 Compliance for LIHTC Housing in NC
 Compliance Specialist
 Construction/Development Executive
 Counseling Management
 counselor with IL
 developer
 Developer
 Development/management
 District manager
 ED
 Emergency Shelter Director
 Emergency shelter provider
 employee of local Government
 Employee of Our towns habitat for Humanity
 employer
 Habitat family services
 habitat for Humanity
 homeless shelter
 Homeless Shelter
 homeless shelter director
 Housing Authority
 Housing Coordinator
 Housing Counselor
 housing counselor in a non profit providing HCV program
 Housing Developer
 Housing Specialist at MCO
 Human Services Agency
 I live in a different state
 Intentional Community
 Land Lord
 Landlord
 Landlord and Property Manager
 lessor
 Local Government Manager
 management
 Management
 management agent
 management company
 Management employee
 Manager
 manager of a specialized housing contract that serves people living with HIV
 Non profit affordable housing provider
 Non Profit Housing Repair Provider
 non-profit
 Non-Profit Construction
 Non-profit Housing provider
 Non-Profit Rehabilitation
 Non-profit who serves low to moderate income clients
 nonprofit
 nonprofit director
 nonprofit lender
 Office Manager for Habitat Affiliate
 owner
 Owner of Multifamily Property Management Company
 President of Management Company
 Previous renter
 Proerty Manager
 Professional in the industry

program director
 Program Director for homeless housing assistance
 Program management for grant funded housing program via ESG funds
 Propeerty Manager
 property management
 Property Management
 Property Management Agent
 property management company
 property manager
 Property manager
 Property Manager
 Provider of Affordable Housing
 Public Houising Authority
 Regional care administrator
 Regional Manger
 regional property manager
 Regional property manager
 Regional Property Manager
 Ryan White Administrator
 School staff
 Section 8 Housing Director
 service provider
 Service provider
 Service Provider
 Service Provider for the Homeless
 Shelter
 Shelter provider
 Site Manager
 Social Service Agency
 Social worker with transitional housing program
 Supportive Service Provider
 Vice President of Operations and Compliance
 work for a property owner non profit
 Work for Company
 Work for Property Management Company
 Work in the Industry of Property Management and Development

Table B.3
How did you become aware of fair housing laws?

The State of North Carolina
 2015 Fair Housing Survey Data

Comments:

I learned about Fair Housing laws working with low-moderate income families directly for 3.5 years in early 2000's as a staff member as well as being a NC Broker.
 -paid position doing fair housing research with NC Legal Aid some years ago -review these issues as part of my job
 504 Coordinator for a housing authority
 6 years of working with the homeless community
 8 years of working in housing and several trainings from NCHFA and Nan McKay
 Affordable housing training
 annual education
 Annual Fair Housing Classes are mandatory with my company.
 Annual training - Grace Hill and other entities
 As a almost 61yr old woman HIV+ woman living with AIDS, formerly homeless...now Chair of Winston-Salem Homeless Caucus, with voting seat on Operating Board and 10 year Plan to End Homelessness, I do my best to be informed!
 As a housing counselor, I've been taught the broad concepts of the laws. On a practical level, I have not learned how to help people enforce it.
 As a Realtor, I am required to know these laws and abide by them. Our Board of Realtors has regular update courses as refreshers and we also observe Fair Housing Month each April.
 As a result of my knowledge of CDBG regulations.
 Assisting families with identifying affordable housing
 Attend Fair Housing Seminars Annually
 attended a workshop
 attended fair housing law seminars every year
 Attended fair housing seminar each year through employer.
 Attended Fair housing seminars as provided by NCHFA for our Company training.
 Attending fair housing law trainings
 Being an advocate in placing individuals in housing I need to know the laws
 By reading the NC Fair Housing Act
 By studying the information that we must adhere to as providers of housing
 By taking Grace Hills Fair Housing class every year
 CDBG Required Plans
 Certification and continuing education training.

City of Lenoir Community Development Administrator 1978-1980, City of Wilmington Housing Program Manager 1981-1994 and Housing Consultant since 1994
 classes 25 years in property management
 COC meetings
 Community leader to talk to the community about their needs of the restructuring of the community housing and infrastructure in buying a homes for African America's in Onslow County since the Civil war/ 20th century played a role in the economy no job. the property taxes on the waterfront
 Counseling Management- very well presented at a variety of trainings, workshops, etc that we are routinely exposed to.
 Current employment deals fair housing
 deal with them regular and had training for rental housing
 Education and training through local, State and National REALTOR Organizations
 education requirements
 Employer provides annual training
 employer training
 employment
 Fair Housing and Reasonable Accommodation training by Nan McKay and Associates
 Fair Housing Classes Annually
 Fair Housing classes required.
 Fair housing is a part of my job. I am also a former real estate broker.
 Fair housing laws are in place to level the playing field in purchasing and leasing a house. The law also protects, or should, the person renting a dwelling from slumlords.
 Fair Housing Training
 Fair Housing Training Certified and
 Fair Housing Training via Grace Hill
 Fair housing training.
 Fair Housing Trainings over last 8 years
 Familiar due to working with the HOWPA program
 Focus in graduate research.
 from meeting with the Raleigh / Wake Partnership, VA Hud Vash program, Working with CSI, Legal Aid, and others who work with homeless and previously incarcerated individuals (primarily military veterans).
 From other agencies
 From Public Housing Authority and from recent training through state DHHS
 From working with people who are homeless
 General knowledge through news, education
 Google searches
 Grace Hill courses
 Grace Hill Training
 Greensboro Housing Coalition
 Have been involved in Property Management since 1984.
 have been working in rental housing my entire career
 Have drafted approximately two dozen Analyses of Impediments to Fair Housing and about 50 CDBG Fair Housing Plans over the years
 have worked in affordable housing rental for 19 years, but as the developer. Have a staff member who is property mgr and has attended fair housing classes.
 have worked in some sector of property management field for 10 + years
 Having been a renter in the past and working with non-profits on housing related issues.
 Having to do inspections and attending housing meetings once a month.
 Health care provider training
 helping clients to secure housing
 Housing Advocate for the rural parts of the State.
 Housing counselor training and research.
 Housing specialist with City Of Clinton
 HUD requirements and Pisgah legal brochures
 I am a HUD Certified Housing Counselor for the past 8-9 years.
 i am a licensed broker and have taken required and elective courses
 I am a REALTOR
 I am also a licensed real estate broker.
 I am an advocate
 I am an attorney at Legal Aid of North Carolina and we do fair housing work.
 I am familiar through my work and community homelessness meetings.
 I am required to certify in Fair Housing as part of my job
 I am responsible for the administration and oversight of CDBG programs for Warren County.
 I am the Family Services Director of an affordable housing program and we are required to be familiar with the laws related to housing.
 I attend workshops held by our Human Relations Council.
 I became somewhat familiar through my work at a NC Center for Independent Living.
 I coordinated a research study at UNCG with Dr. Stephen Sills - paired-testing audits of affordable rental units in Greensboro comparing Hispanic vs. non-hispanic white and then black-white finding discrimination rampant for black applicants but not for hispanic -- published papers available if you google me Elizabeth Blake and Stephen Sills -- I did the lit review and most of the rest of the writing of those publications. Also performed a records review for the city of Greensboro's fair housing office complaints
 I had to look them up in order to assist someone who was in search of housing.
 I have attended Fair Housing training
 I have attended multiple fair housing workshops with my job.

I have attended several trainings on Fair Housing Laws.
 I have attended training on fair housing for over 15 years.
 I have attended training seminars within my company and also with outside organizations.
 I have attended trainings about the subject
 I have been in property management for over 30 yrs.
 I have been working in local government for over 23 years
 I have been working in Property Management for about 3 years and have attended several trainings as well as read documents provided to us.
 I have taken Fair Housing training.
 I have taken several fair housing courses
 I have worked in community development for 20 years.
 I read Federal, State and Local laws that govern housing. I also attend training and seminars dealing with such.
 I volunteer with Habitat for Humanity
 I volunteered in the past with Fair Housing organization in interviewing Latino residents of apartment complexes in Durham
 I was a "secret shopper" for rental communities and asking about fair housing issues was one of the issues we asked about. This American Life also had a story in the past 1-2 years about Fair Housing laws.
 I work at a FHAP
 I work at the Salvation Army Center of Hope, which is a shelter for Woman and Children. They also go by the fair housing laws.
 I work for a housing agency in the IT department
 I work for a non-profit agency that assist in housing homeless people.
 I work in housing directly addressing landlord/tenant issues for consumers we serve.
 I work in the realm of promoting fair housing.
 I work with folks living in substandard housing
 I work with homeless families in Raleigh,NC
 I worked for a HUD approved counseling agency. I am also a HUD Certified Housing Counselor
 I worked on administering HPG and CDBG grants in a former job.
 I'm familiar with them in theory, but not point for point
 In my role as a Housing Specialist for many years, it was my job to be aware of rules, regulations, and laws around fair housing, and to communicate those to our clients.
 In Research/requirements for compliance with HUD guidelines
 In the business I work with
 in working with my clients, I often see discrimination based specifically on race and behavioral health issues. It inspired me to learn more. I have attended a number of events about fair housing by Asheville-Buncombe Community Relations
 Industry requirements
 Information provided by Grant Administrator
 Interaction with Supreme Court case out of Texas and the Senate proposal to repeal the NC Fair Housing Law.
 internet
 job responsibilities
 Knowledge of this is required as a result of working at a public housing authority.
 Landlord Trainings
 Learned about the laws through training at work.
 Learned as part of the requirements of my profession.
 Legal Aid
 legal background
 Local Govt.
 Managing and Developing affordable housing (HUD/RD/Tax Credit) since 1979.
 Mandatory Classes through Grace Hill and our Management Company
 Member of our local Cape Fear Housing Coalition.
 Multifamily housing property manager for over 15 years. All of the management copmanies I have worked for make it a top priority to provide yearly Fair Housing Training.
 My agency does HUD Housing Counseling and I have attended several workshop concerning fair housing.
 My business hosted a fair housing class
 My coworkers are housing specialists. I also have spent years providing services to the mentally ill and assisting them with housing.
 My previous experience was in property manager. Fair Housing was a topic of many seminars.
 My work requires me to be familiar and take classes
 NC Housing Coalition and NCCEH training and presentations
 NC State Law
 on a board of a community relations org and a housing tester
 on line training and self educated
 on the job experience and exposure to housing issues; news updates regarding Supreme Court decision regarding fair housing laws.
 Online and in person workshops and trainings
 Online training and reading the code at Fed Reg
 organization adheres to policies
 Our management company requires all property managers to attend the Fair Housing classes yearly.
 Our organization has a Fair Housing Seminar every year for local residents and residents in surrounding counties. The seminar educates residents on fair housing laws who are renting, buying or looking to rent or buy.
 over 20 years of experience working in affordable housing industry
 own rental property, and advocate at our organization ABIPA.
 Part of my employment
 President of Management Company
 Previous property management software
 Previously sold real estate

Professional training and on-line instruction
 Professionally, through experience, research, and training
 Property management training
 Property manager for 20 years
 Property Manager HUD/Tax Credit Properties
 Provide services to the Homeless with housing options
 Providing repairs to seniors homes through various grant and governmental agencies.
 Reaching out to Legal Aid of NC
 read up on them
 Reading
 Reading online information
 Real Estate Agent
 real estate agent 87-94
 real estate broker license; minimum housing code enforcement
 Real Estate Broker, Non Profit Administrator, Government Official
 real estate broker. section 8 work.
 Real Estate career
 Realtor
 References in paperwork, news stories
 Regular articles, personal interest
 Regular management training seminars with my employer
 renting property
 Required classes and training due to occupation
 Research due to the type of work I do.
 Researched the Fair Housing Laws when looking for housing
 Researching for myself and clients
 School
 See pamphlets about it that we are required to hand out.
 Somewhat familiar due to my career requirements.
 State trainings, HUD guidelines , C/O/C, Balance of state, Internet,webinars
 Studied in graduate school.
 Study through publications and American Bankers Association online courses.
 Supervising funding programs for affordable housing
 Tax Credit Training
 Teaching ready to rent curriculum
 The City of Durham's Community Development Department hosted a Fair Housing training earlier this year
 The first 4 apt units we built were constructed under the federal tax credit program.
 The organization I work for has a Fair Housing program.
 Through 15 years of CDBG, HOME and Section 8, administrative work.
 Through a presentation by ABCRC in Asheville.
 Through administration of CDBG projects, I have had to become familiar with fair housing laws in order to comply with federal/state requirements.
 Through administration of Community Development programs
 Through CDBG compliance procedures
 Through Community Development Academy training and CDBG fair housing training
 Through COmmunity Development administration
 Through Community Link and ESG
 Through education in regards to implementing a Rapid Re-housing Program from Emergency Solution Grant funds. Knowledge of laws and fair housing in essential to provide efficient services.
 Through Fair Housing Training and addressing issues in Management of affordable rental housing.
 Through Fair Housing Training courses through management companies and NAA.
 Through housing counseling certification
 Through HUD and NCHFA project development experience
 Through internet, emails, newsletters etc.
 Through my becoming an Onslow County United Way Board Member
 Through my work as a social worker
 Through my work with Habitat for Humanity
 Through my years working in the affordable housing industry
 Through NAHMA courses
 through online research
 Through research and training on different housing programs
 through research, history and my employment
 Through the students with whom I work. These students often find housing challenging so I contacted ABCRC for more info.
 Through training as a Certified Property Manager and additional Continuing Ed for my North Carolina Real Estate Broker license.
 Through training with NCHFA
 through various trainings offered by SAHMA, HUD, local lawyers, etc.
 Through work
 Through Work
 through work hearing about reasonable accomodations, landlord tenant law brochure from legal aid
 through work in local government and working with customers
 through work.
 Through working with Ryan White and HOPWA
 through working with the homeless and getting them housed

took classes through Fair Housing training

TRAINING

Training / Legal Seminars

Training and experience

Training and experience in industry

Training as part of my certification as a Housing Counselor. I was taught the Federal laws. I can recognize a violation and suggest that it be reported. I cannot always say where or how or what the outcome might be.

Training as part of my role as a Housing Counselor

training by NAA

training classes

Training on Fair Housing offered locally.

Training required by HUD

Training seminars through HFHI and NCSOS.

Training seminars, company training.

Training through courses offered by NeighborWorks, and other organizations

Training through different agencies.

Training thru employer.

Trainings

Trainings about fair housing, providing assistance to people with disabilities regarding fair housing issues, NC Housing Finance Agency booklet

trainings for grant administration

Trainings, research/reading

Use to be on Section 8 and previous renter

Various training classes over the years and reading materials related to the subject.

Very aware of an RAI & understand their purpose. Also know that changes will be occurring over the next several years with more stringent laws.

VOA Provides yearly training on Fair Housing

We are a HUD approved housing agency and a Habitat for Humanity affiliate with ties to the NC Housing Finance Agency so we are aware of fair housing laws.

We build houses for low income persons.

We have a transitional housing program, understanding HUD fair housing and NC fair housing laws is essential.

We have constant classes

We receive government funding for our shelter so try to stay informed.

Webinars, and online access.

When I became involved in apartment rental.

While studying to become a certified "Ready to Rent" instructor.

work

work as a CDBG program administrator. Have prepared at least two dozen Analyses of Impediments to Fair Housing and implemented many Fair Housing Plans for local governments.

Work for Housing Dept. for Wake County

Work in the industry

Work in the industry.

work with human relations division

Worked as a leasing agent in market rent apartments. Work in accounting of tax credit apartments. Fair housing is covered in annual meetings with the property managers. I listen in.

Worked with FHAP for more than 15 years.

working as a homeless services provider

Working for a housing organization.

Working for DSS

Working in Community Development

Working in homeless services.

working in housing industry

Working in local government. Also in previously purchasing and selling my own home.

Working in property management for over 25 years, I have had annual training from various sectors in the rental industry.

Working in property management in VA I had to maintain a current certification.

Working in real estate, mortgages and property development

Working with CDBG grants

Working with Habitat for Humanity of Orange County

Working with housing grants through my employment

Working with HUD and the Housing Choice Voucher program

Working with HUD programs CDBG & HOME

Working with landlords and renters

working with Legal Aid on a project and Habitat for Humanity

working with local governments on a multi-jurisdictional Assessment of Fair Housing, modeled upon proposed HUD rules

Years in Property Management and yearly fair housing class

Table B.4
How should fair housing laws be changed?

The State of North Carolina
 2015 Fair Housing Survey Data

Comments:
1) persons with low credit scores 2) persons released from prison 3) veterans 4) LGBT persons 5) unmarried adults (shared housing) 6) older adults (not in designated elderly housing) Acknowledging the recent federal change to include LGBT citizens. All groups All stated in #4. I know people living in dangerous dwellings whose personal issues are used against them as leverage to not make waves, particularly group homes Any person with criminal histories Certain Criminal background types and certain things on a person credit should not penalize them from obtaining housing children of immigrant parents chronic homeless, bad credit, former offenders, those with immigration status issues Criminal pasts...depending on the charge and length of time since conviction Domestic violence victims Domestic Violence Victims, Veterans Domestic violence victims economic discrimination since this is about the only one left. Ethnicity Preference (LGBT) Age families with children non-traditional family units Former offenders Formerly incarcerated, military veterans, some people with mental disorders. Gay and Lesbian, Bisexual and Transgender Gay/Transgender Gender gender identity; sexual orientation; mental health GLBT HIV+ population and aging adults Homeless homeless families homeless, HIV cases, and youth without anywhere to stay due to certain disorders. homosexuals, transgender people I don't think landlords should discriminate against people with felonies. I feel that housing younger people with mental and physical disabilities in the same housing units with elderly residents is inappropriate and unfair to both parties; has been problematic especially to senior citizens who reside near mentally ill neighbors If not already then, same sex couples and LGBT If sexual orientation isn't already a protected class, it should be. In my experience, individuals on ITIN have a difficulty with adequate housing. Income, Homelessness Status Individuals with felonies (there should be a time statute or limitation) individuals with housing vouchers JOB RELATED- IF SOMEONE IS ABLE TO WORK THEY SHOULDN'T QUALIFY FOR ANY ASSISTANCE LGBT LGBTQ LGBTQ community LGBTQ individuals locally. LGBTQ, occupation low-income Marital Status, Low-Income Marital status, source of income, age Minorities, homeless and the disabled, only because I feel there are systemic ways to get around "housing" these folks fairly. People Infected with Hepatitis People lost job should also get protected too People who are lesbian, bisexual, gay, transgender People who were most recently homeless. People who are living on a fixed income -- can't easily absorb rent increases. People with criminal records who have completed their time served People with non-violent criminal records should have rights when trying to lease a home. It seems nearly impossible for them to find housing. persons with disabilities, military veterans, etc. Prior offenders; including sex offenders. same sex couples Same sex marriages Seniors, Veterans, and Persons of low income. sex, aging sexual orientation Sexual orientation Sexual Orientation sexual orientation gender identity unmarried couples (don't know if marital status is still an issue -- used to be problems in some places) sexual orientation (LGBT), ex-offenders of non-violent crimes Sexual orientation and citizenship status

sexual orientation and gender identity
 Sexual Orientation and Gender Identity expression.
 sexual orientation and marital status
 Sexual orientation and marital status
 sexual orientation, gender identity, age
 Sexual Orientation, Gender Identity, Marital Status, Medical Condition, Gender Expression
 sexual orientation, income level, ex-offender status
 Sexual orientation, marital status, age, sources of income
 Sexual Orientation, Marital Status, Fixed Income
 Sexual orientation; marital status
 Sexual orientation; marriage status
 Sexual Orientation/Identity
 sexual preference
 sexual preference and gender identify
 Sexual preferences
 Single (couples) - such as roommates. I have had people come to me about a local HUD apartment complex that will not allow 2 single roommates to live together. They tell them they must be married.
 Smoker
 Source of income
 source of income to increase options for housing choice voucher holders
 Source of income, age, marital status, sexual orientation, gender identity, domestic violence survivor/victim, military personnel
 Source of Income; marital status; sexual orientation
 Those with criminal background concerns or have family members with criminal background concerns
 Those with low level criminal charges or background. Continues to perpetuate cycle of homelessness.
 Though there are laws protecting persons with HIV AIDS, I personally know of people here in Winston-Salem who are being evicted because of their status!
 Transgender
 Transgender population, certain criminal backgrounds
 Transgender, regardless of sexuality or sexual preference
 undocumented residents, lgbtq
 Unmarried Couples and LGBT.
 very low income/proverty level families
 victims of domestic violence or sexual assault. previously incarcerated women w/children who have felony from 6 years ago. we have had many women (victims of dv/sa) who can not secure housing because of a felony conviction from their past (6 or more years ago), many times during their teen years, before they even began a family). They have since cleaned up their lives, no re-offending, and yet can not qualify for housing. Yet the crime rate, while improved, remains to be horrendous. In fact, we have had several shootings in local housing resulting in at least one death. How long must one pay for for a crime they committed years ago? We don't get a lot of trouble with these sorts of things in our region of the state, but recent news suggests sexual orientation may be or become a problem in certain parts of the state.
 What is referred to as a disability should be more defined.
 While they already are protected, stronger protections for transgender and transsexual tenants.
 WOMEN
 Young and elderly people

LOCAL FAIR HOUSING

Table B.5
Are there any specific geographic areas that have fair housing problems?

The State of North Carolina
 2015 Fair Housing Survey Data

Comments:
All Asheville - substandard housing, unsafe housing, discrimination Asheville, NC. Since "Fair Market Rent" for Housing Choice Vouchers is calculated for such a large region, including relatively inexpensive rural areas where there is no public transportation or jobs, it seems we are at risk of depopulating Asheville of historically marginalized groups including blacks and the disabled. I think the black community in Asheville is already smaller than in similarly sized NC cities. Brunswick County, fastest growing county Chapel Hill - many of the workers from UNC cannot afford to live anywhere near the University because the housing has gotten so unaffordable and any housing that is remotely so is targeted/rented to students only. Eastern North Carolina far eastern and western areas of the state- less metropolitan areas For the most part very rural areas. Halifax, Nash, Warren, Bertie, Hertford, and Northampton Counties has too few rural development housing programs to help those in need. I answered 'don't know'; however, it stands to reason that in smaller and/or rural areas where these services are not located, lack of transportation and knowledge of existence of such programs would likely cause residents to either not be aware of or not be able to access these services. I can only speak for Durham as that is what I am familiar with. With the increasing population and certain neighborhoods becoming desirable, working class, Latinos and African American families are being pushed out of neighborhoods.

I think everywhere
 It's more substandard housing issues up here. Encouraging each area to provide access to FIT inspections without having to go to the level of court would be a major step in the right direction.
 Most rural areas have them. Urban areas too but people are more aware of their rights in bigger towns.
 Northeastern NC where there is a lack of community resources to access housing resources and if any resources of available, they are usually gone before the majority of the population has access to them.
 Onslow County
 Probably some more than others - depends on the people involved in the rental or buying transaction & if they know the rules or feel like there would be consequences.
 probably urban and rural areas which resist higher density housing
 Raleigh/Durham/Chapel Hill, Fayetteville, Rocky Mount
 Rural and metropolitan areas of the state have fair housing problems. Not sure of which areas but it does exist.
 Rural Areas
 Rural areas and communities appear to have segregated neighborhoods
 Rural areas are affected by suburban sprawl, which reduces low-cost housing stock and increases land values. Urban areas are affected by gentrification, which increases property values and rental costs.
 Rural areas within NC
 Rural areas.
 Rural areas... Small towns are impossible to increase fair housing- low rent
 Rural NC.
 rural, urban
 small towns and rural areas of NC
 Southeast Raleigh, Central Raleigh
 Statewide
 The larger cities and more populated areas.
 The wealthier areas in Charlotte, Raleigh, Cary, Asheville, etc.
 There is NO enforcement entity in the Western part of the state.
 There needs to be more public housing in our area
 This more of a general statement but residents of areas that lack access to local or regional fair housing agencies are at disadvantage when it comes to the ability to respond their complaints in a timely manner.
 TRANSYLVANIA, POLK AND HENDERSON COUNTIES
 Union County
 Urban and rural areas have these problems mainly due to lack of affordability and accessibility.
 Wake and Meck County
 West Winston-Salem
 Western and more rural areas of the state
 Western North Carolina rural communities.
 Whoever wrote this survey.
 Wilm8ngton
 WNC
 WNC has huge issues around fair housing -- particularly since many group homes were established here and then many of those clients have been released or fall under the State's mandates to help folks become sustainable on their own. I've also seen a good bit of racial discrimination in housing here.
 Yes I am certain this is across the country but again I can't give specifics at this time all I can say is that fair housing must be enforced but I don't think it is always the case

Table B.6
Please share any additional comments.

The State of North Carolina
 2015 Fair Housing Survey Data

Comments:

A state rental assistance program would be a wonderful idea. The Federal Section 8 program is so limited and waiting lists around the state are large.
 Affordable housing is very difficult in Jacksonville. Barriers include: evictions and/or poor credit and criminal history. Many landlords disqualify clients based on this information.
 always seems to be lack of ground floor apartments for handicapped individuals and no elevators- stairs only. all of recent and pending construction is multilevel.
 As a housing provider, it is sometimes difficult to have any respect for fair housing advocates who investigate absurd discrimination claims which are clearly invalid and yet they insist on conciliation when there is no evidence of discrimination present! And the testers are not always ethical in their dealings. It is a shame that these FHEO employees waste so much time on ridiculous claims instead of concentrating on discrimination that is so open and obvious!
 Due to laws and regulations occurring frequently and due to some of the questions you have asked, I feel that I need to enhance my knowledge. I will seek
 Due to the foreclosure crisis of the past few years, more and more persons/families are forced to rent. I worry that landlords and rental agents are not properly educated on FH laws. I also think that those that rent are unaware of their rights and responsibilities as well. I worry that our aging population will suffer disproportionately as rehab funds are no longer available to allow them to age in place.
 Everyone deserves to be treated fairly regardless of their physical appearance, handicap, race or sex or religious beliefs, level of education or income, or color of their skin. People should be respected and received as they are.
 Fair Housing is very important. Some of the regulations are very clear but some others like desperate impact are more difficult to understand and apply.
 Fair Housing it seems is not really fair at all. If you play by the "rules" persons with disabilities often still lose and don't get the help

and support they need.

Fair housing opportunity can sometimes be impeded by the 'grey' areas that exist in income eligibility for programs and/or services whether for rental or purchase or repair. The 'working poor' are often left out because of these cutoffs and lack of consideration that their gross income (which is usually what is asked for) is not what they have to work with and since they don't qualify for entitlements, it's just as likely that they will have difficulty meeting income requirements for renting or purchasing or making repairs that would keep their housing in proper condition.

Fair housing practices aren't as much of an issue as landlord/tenant law. A

Fair housing should be strictly enforced but I don't think this is always the case

Former offenders are often not allowed to rent certain properties even though they work and can afford the rent or mortgage.

I am concerned about gentrification in Durham and other cities where long time residents are being displaced with no viable plan to keep them in their existing community. Often current residents are priced out of the newer, energy efficient housing.

I am only familiar with our activities here at the Housing Authority, and we protect and serve AFFH. While I'm sure there are violations, I don't know of any specifically and hope these violations will be stopped to protect choice.

I have too many. If you organize a committee to study the State's plan for affirmatively furthering fair housing, I would like to be included.

I know this is a hot topic in the news right now and that individual privilege is being touted as a civil right by those who have never had to look at the margins. However, in this region, the issue of Fair Housing seems mostly to be a matter of ignorance rather than intent. Much of what we see is touted as punitive by those obviously seeking to further their own fiscal gain. A consistent public campaign focusing on the facts that does not change its message during the random wedge issue drama fests that will always crop up would be the best course for ensuring non-biased access to information was always there. If it was rendered more frequent in times of high drama, the consistent message of support would potentially have the side benefit of calming folks down a bit from their soap-box fueled fears.

I need much clarification on Fair Housing

I rarely work in North Carolina, so while I am familiar with the laws, I'm unsure if they are adequately enforced.

I think annual Fair Housing Training should be mandatory for anyone who works in the housing industry.

I think fair housing laws are generally followed and enforced, although unintentional violations can happen. Without fair housing laws, we would not see minorities moving into previously all-white suburbs, but it seems likely that many racially identifiable neighborhoods will persist because of financial issues and homebuyers' choices. Ensuring that all people are allowed to buy or rent a home in whatever neighborhood they choose and can afford should be the main focus of fair housing efforts. Forcing cities or neighborhoods to achieve some statistical goal of diversity does not benefit individuals. The state building code could require wider doors and other accessibility standards both for currently disabled residents and for owners who wish to "age in place" without having to modify their homes. That would be a worthwhile goal benefiting almost everyone.

I think our area just needs more resources and tactics on scrutinizing what we have so that it is not used by ineligible participants.

In my admittedly limited "real world" experience, it seems many of these rules and regulations are toothless- the resources necessary to enforce them simply don't exist. A strengthening of enforcement in a targeted way (put bluntly, making an example of violators) may help reduce the willingness for people to take these laws and policies lightly.

Individuals renting a room in their houses may not wish to rent to the opposite gender in order to avoid awkward and uncomfortable situations. This is not the same as not renting an apartment to someone of the opposite gender and should not be illegal.

It is very important that developers who receive tax credits or other financial incentives to build housing that is supposed to be available for people with disabilities be held accountable that they are doing so. It is not fair to receive these credits and then rent at market rates.

Lack of affordable, safe housing for people with no or limited income is a huge problem. Some of the subsidized housing is not safe. Many answers of "don't know" because while I believe there are problems in those specific areas, I don't have absolute, confirmed specifics.

Maybe I missed it, but I think that access to grocery stores and fresh food is a problem for many protected classes. There are several food deserts within Asheville, and they tend to predominately be in areas with high populations of protected classes.

n/a

NC has always been very protective of individuals right to housing and fair lending practices. Better than most in the nation I believe. Need more communication between state and local governments and better regulation of those entities that receive federal CBDG and HOME funds

Need to increase zoning for low income housing, shelter

Need training for the general public as well as service providers

Not realistic here. Old white money rules

Our agency feels that HUD has done a remarkable job assuring that fair housing is a priority and has set regulations to assure that equality, accessibility, and education are in place and available.

Our county has a severe shortage of affordable housing, period. Our public housing has a 1-2 year waiting list, the Section 8 voucher program is closed, and our 3 privately-owned income-based apartment complexes are so overwhelmed with applications that they aren't accepting any more. That is creating a stalemate for shelters and homeless services here, as there literally are no low-income housing options for anyone, even those with income or disabilities.

Private landlords are the real problem. Otherwise, it is lack of knowledge, not bad intentions that result in fair housing violations. I could see a new leasing agent/property manager steering tenants to certain buildings because they have children and want to make sure the new tenants have other kids nearby to befriend, or doing more for one tenant than they would another because that person doesn't have friends or family around to help (or that person was just really nice).

State policies should encourage smaller jurisdictions in metro regions to join with larger cities on regional fair housing strategies, outreach, testing and enforcement. LIHTC allocation plans and decisions should specifically encourage new rental housing outside areas of high poverty and along transit corridors.

Thank you for doing this survey.

The barriers that the Section 8 clients encounter is the label the client receives by virtue of the fact he is a "Section 8 Participant".

Some of the realtors in this area discourage owners from accepting the section 8 client.

The general public does not understand what is fair housing. There are key things like credit, income, and what is really available in the market that will effect where a household can afford to live vs would like to live.

The majority of our clients don't qualify for housing because they can't pass the credit check. Most of our women are indigent when they come into the shelter. Others have bad credit from many years past.

The Raleigh Housing Authorities Fair Market Rents are well below real market value rents. By having them so low, it limits where the voucher holders are able to rent, often not allowing them to choose neighborhoods with more diversity, conveniences, and better schools. While I realize that the voucher program has faced funding cuts, limiting voucher holders to below market rent values, that even keeps them from renting at low income tax credit communities, seems to be an unjust practice. Also, Raleigh Housing limits their rent increases at renewal to landlords at \$20 which is not keeping up with the pace of the market, especially when they have refused rent increases in the past or asked landlords to take cuts in rent. Again, this forces the family with the voucher to have to move (a great expense) to a neighborhood that is less than desirable without the conveniences they have experienced at current location.

We need a fair housing enforcement arm over here in WNC. We're mountain folk (not necessarily our description, but one that seems to get used a lot in Raleigh about us). We trust our own and waiting for someone in Raleigh to make a decision about our cases doesn't feel well. I've had clients who said they never got followed up on when a complaint was filed. I know our numbers have been low, but in talking with agencies here who do the work, many have stated the clients don't trust Raleigh in light of our general assembly's actions of the last several years against the area.

We need affordable housing for Families with Children.

We participate in ongoing courses and adhere to the guidelines.

We provide housing/shelter to those in need regardless of disability, race, gender, etc. As long as we have space available in The ARK.

Would love more practical knowledge on where to get information and assistance locally.

FAIR HOUSING IN THE PRIVATE SECTOR

Table B.7

Are you aware of any questionable practices or barriers to fair housing choice in the rental housing market?

The State of North Carolina
2015 Fair Housing Survey Data

Comments:
<p>-some of these are social (I want to live with people like me) -gentrification -the recent decisions on fair housing worry me because it could have the unintended consequence of reducing investment in existing low income housing communities and building new ones where the land is economically viable to do so.</p> <p>1. too few choices outside high poverty areas 2. lack of resources to subsidize new affordable rental units in suburban and rural areas 3. lack of policies to target suburban, high opportunity areas for new affordable rental housing 4. decisions by the N.C. General Assembly to stop using Small Cities CDBG funding for housing</p> <p>A general barrier for all renters is lack of rental property in Asheville due in part to the number of units being used as vacation housing. This certainly increases any barriers for low-income families.</p> <p>Accessible housing is a big issue.</p> <p>Advertising vacancies to specific groups. Protected groups may not be aware of rental properties.</p> <p>Affordable rental properties are often only built in communities of color or low wealth neighborhoods - restricting the options of low income families</p> <p>Anecdotaly I know of people in my area who were questioned about familial status or felt discriminated against based on race.</p> <p>Cost is a major barrier in Asheville. Also there are landlords who prefer not to rent to people of color. Lots of gated communities are springing up.</p> <p>Cost of rent too high in small areas with energy inefficient homes.</p> <p>credit and criminal background</p> <p>credit checks can be used to restrict protected persons from their housing choice.</p> <p>credit checks, background checks with arrests/convictions on record</p> <p>Discrimination based on race</p> <p>Excludes families living in hotels and families that are doubled up and fall under the McKinney Vento definition of homelessness</p> <p>Failure to rent to Mexicans.</p> <p>Families - don't want kids Felonies</p> <p>Fear is a big cause.</p> <p>Government Regulations</p> <p>Have known of some residents being refused for rental property when they realized there were bi-racial children.</p> <p>Hearing impaired. Renters hear \$\$ when considering moderate accommodation, instead of, limited income renter for life high rental rates</p> <p>Housing Authority requires on-line applications and does not invite applicants to come to the office. It concerns me that persons with disabilities are overlooked in their application process and I think they should be required to host application sessions in coordination with Voc Rehab and the VA.</p> <p>I am not totally sure, but given the make-up of our state, it would not surprise me. I have had a few of my clients suspect something funny.</p> <p>I am sure there are but its more discreate</p> <p>I believe that individual landlords regularly discriminate.</p> <p>I hear stories of landlords turning down applicants for having children (e.g. they accept two adults but not one adult and one child).</p> <p>I know property owners who refused to rent to people they feel have mental health, substance abuse and/or intellectual developmental disabilities.</p> <p>I once had a man denied because the landlord learned he was connected to a HIV organization.</p> <p>I was speaking to a lady the other day and she said she was moving into a house and when the landlord found out she was married to an African American she told her not to unpack the van.</p> <p>I was supporting an individual who was looking to rent a home with her boyfriend. They had adequate joint income to support the rent amount and both had good references. They landlord denied them because they were not married. I encouraged them to report this and they chose not too because it was someone within the neighborhood they were already living in. I encouraged another</p>

person to file a reasonable accommodation request to allow her to pay rent when her disability payment arrived, as she had requested this previously in person with the property manager and was denied. She was granted the accommodation, but would not have received it had she not been informed about the process.

In particular I have seen it with behavioral health clients. The state requires that agencies help clients become sustainable on their own, yet many cannot get adequate living arrangements that won't "penalize" them the minute they find out the client has a diagnosis or caseworker. I have seen clients get denied or charged a different rate based on this fact alone. I have also seen it with same-sex families who, when discussing a place as an individual, everything is fine. Then, when they fill out the application and list a spouse or partner, the situation changes and a unit is no longer available.

Income barriers. If people are discriminated against in employment, which many groups are in NC, then they cannot afford adequate housing.

income, gays, looks, etc...

Independent landowners not working with a real estate firm may have less knowledge about the laws and feel as if the rules do not apply to them

Individuals coming out of homelessness (especially shelters/street) may improve themselves and financial status but have been denied housing due to the stigma and stereotypical thinking about homelessness.

ITIN individuals often live in substandard housing

landlords lack of knowledge of the law

Landlords, I know of a specific example in another county where he will not rent the house to this young couple because he doesn't want children there. They have a new baby.

language barrier

language barriers, families with children

Large families, single mom's with male children have a difficult time renting.

local government Planning Departments, Board of Adjustments and elected officials need to make decisions regarding request to build housing for lower income and disabled persons based on the land use and zoning requirements set forth in their Codes and Ordinances not the sentiment of unaccepting residents. The potential impact on the value of adjoining property should not be a condition for a special or conditional use permit if the proposed housing for persons with a disability or special need (i.e.: substance addiction) is requested in an area of compatible land uses or approved uses in the zoned area.. Property values are subjective decisions.

Local private rental property owners still exhibit bias, especially with low-income applicants. They will often rent to white applicants with the same income as other ethnicity applicants first. There is still a stigma associated with minority renters, such as black, hispanic and hmong, our main minority populations here, and property owners are concerned about overcrowding and poor property maintenance if they rent to them.

Many landlords and property managers are ill-informed on fair housing requirements.

many landlords are not prepared to modify properties for the disabled.

Mixed-race children are often used by housing providers to deny housing to qualified applicants because of (skin color).

Most common is rental to large family with multiple children

Most renter's are required to have income that is equivalent to 3 times the rent. Supplemental income is too low and subsidized housing has such a long waiting list.

Much of this in our area stems from the refusal of landlords to accept Section 8 vouchers

Neighborhoods are segregated. Affordable housing (specifically public housing) is very much separate from the rest of the City, and for this reason has little access to resources, jobs, and amenities. Asheville has made developmental decisions that continues to perpetuate segregation, i.e. Urban Renewal in the 70s, and more recently the I-26 Connector plans that will take out one of the two last remaining African American neighborhoods.

Nimbyism for developing low income rental units

no low income housing

no renting to anyone with a criminal record (felony) no renting to folks with bad credit

Not all rental properties are handicap-accessible.

Not allowing a Hispanic family to move into an apartment community because of stereotypes and preconceived notions..

not allowing rentals with service dogs.... restricting certain age of children.

Old landlord debt Criminal Histories Race discrimination Sex discrimination--Landlord discrepancies with female single family homes

Once homeless, too many landlords resist renting to us. They may fabricate reasons that are within the legal allowables...but they are fabricated...or suddenly "no longer available"

people not wanting to rent to people with mental illness

People often list rentals as for a couple, or not for families. However, if they are landlords with few units, they are not subject to Fair Housing laws. Also, people refuse to rent to those with HUD subsidies, often discriminating against those with disabilities.

People who are undocumented are limited to where they can rent due to lack of papers. As a result, they often end up in sub-standard housing, and feel unable to speak up about housing conditions. Children who are American citizens live under these sub-standard conditions.

People's perception of affordable housing creation in general.

Placing tenants with vouchers in a separate building from tenants that pay full rent

presence of unsafe, substandard housing limits choice

Private sector is the real Fair Housing problem. Religion, national origin, and familial status will likely be a determining factor in whether someone is shown a rental house or accepted as a renter. The private sector home owner has to deal with the neighboring home owners. It puts pressure on the person to find tenants that "don't cook stinky foods" or "don't have a bunch of kids."

racial discrimination-housing taken off market or implied already rented due to race

Racism structured covertly into application and screening process without overtly violating laws or regulations.

Refusal to rent based on Gender and familial status.

refusing to rent based on low credit scores

refusing to rent based on previous address

Refusing to rent to people with a Section 8 voucher disproportionately impacts people of color, people with disabilities, and the elderly.

Religion, Christian conservative beliefs questioned.

rental housing costs exclude a disproportionate number of lower income from the "better" areas, i.e., schools, parks, sidewalks, bike lanes, etc. Many of our African American neighbors are low income.

Section 8 discrimination, LGBT discrimination, race discrimination, age discrimination.

sex offenders

Shelter clients, homeless, DV clients, human trafficking clients

small-time landlords requiring more from black applicants (criminal background, for example), in general mom-and-pop operations -- whether or not they fit under the umbrella of exceptions to FHA due to limited number of properties), white landlords steering white applicants away from their majority black neighborhood properties, Also just the widespread de facto segregation by race/economic status that exists while not necessarily covered by law, definitely creates a climate of unfairness, differential life outcomes, and ghetto-ization of poor and black communities. Also public housing and housing authority operated systems such as housing choice vouchers (at least in Winston-Salem) excludes the least advantaged even though they are often the most affordable option by requiring criminal and credit checks that create barriers especially for those who do not understand how to advocate for themselves and make their way thru the system.

Some areas wish to exclude minorities

Some ignorance about working with those with disabilities seems to be prevalent statewide, particularly among smaller landlords.

Perhaps a small bit of funding to allow a summary brochure to be sent to anyone who declares rental income in their tax return.

Some properties require tenants have a certain income level, although income is not a protected class, many people with disabilities do not meet the required income level required.

Stories about higher rental rates (monthly rate, deposits and late fees) for Hispanic persons have been communicated.

substandard housing; deteriorating conditions of older homes; insects/pests/bats; unresponsive landlords;

The news media indicates there are impediments, though I have not seen them first hand.

The research is fairly clear that black potential tenants are denied housing significantly more often than any other race, nationwide as well as in North Carolina.

The supply of affordable rental units is not keeping up with the demand.

there are limitations if you have a past.

There are rental agencies and individuals that will not rent to people of a certain religion or background in Anson County. There are also landlords in Anson County that accept only cash payments from renters in order to not pay their fair share of income tax. Anson County is tough on people of certain backgrounds in the rental market.

There is very little affordable rental housing in Chapel Hill and Carrboro. Individuals with Social Security income cannot afford housing.

Unwritten expectations in specific neighborhoods related to race or appearance of non-Christian beliefs.

We are still faced with neighbors where renting or purchasing a home is based on color. Still seeing racial segregation within our communities, whereas, occupants of another race are not readily accepted in certain communities.

zoning issues in favorable neighborhoods

Table B.8
Are you aware of any questionable practices or barriers to fair housing choice in the real estate industry?

The State of North Carolina
 2015 Fair Housing Survey Data

Comments:

-I (white) personally was shown a home in a predominantly black neighborhood by a black realtor. It fit my income needs and I liked it. But he did everything he could to discourage me including not returning calls AFTER we had met in person.

Above.

Affordable housing not available and families with children are not included.

area is bias

Client made aware of property by a current resident/friend but was shown a different property when visiting the site and was told property was no longer available; however, friend informed that no one had moved in several weeks later.

complexes that only house families

Doesn't help the homeless. Landlords difficult to find for our families - especially if they have had a conviction

For purchase? NO. Real estate agents are often soulless vultures just out for a sale.

Government Regulations

Home Owner Associations creating barriers to buying and selling properties in certain locations.

I am 100% sure that discrimination happens in this area; proving it is another story.

I have heard from friends in the real estate industry that this is in practice.

I have known agents to steer a potential buyer to neighborhoods he/she thought the client would fit in or like better and suggest that other neighborhoods are not "what you'd want."

I have not experienced this, but only showing properties in certain areas to certain races.

I have referred consumers to real estate agents in order to find rental property in areas that have public transportation and great schools. These people were shown properties specifically located outside of the city limits which did not have the resources they needed to thrive.

I have seen same-sex families be denied showings

I have seen situation where people are denied a home because they have kids.

its an excellent way to keep homeless "less thans" out of their rentals

Limited data from real estate industry to prove discrimination.

no renting to anyone with a criminal record (felony) no renting to folks with bad credit

No violation, but some trend of showing homes to families that are not going to be able to afford them. ie a family says less than 150k and the realtor shows up to 220k when they know a low bid is not going to be accepted.

Not many real estate companies rent here, mostly "mom and pop" landlords.

Not wanting to rent to families with teenagers

Only showing african american clients properties in targeted areas

people are steered to certain areas

People of color and people with disabilities own homes disproportionately less than white people.
 Race discrimination is a bigger problem in the real estate industry. Religion discrimination is a barrier
 Realtors locally sometimes seem to steer people by race, age, and family composition
 Realtors look at your family situation in making suggestions of housing to purchase.
 same as above
 Senior housing with incentives considered section 8 because of subsidy
 Showing people of color to specific areas
 Some properties owners/managers will not consider allowing the property to be rented as a group living setting for adults. For example, Oxford Houses, etc.
 Some real estate agents say more than they should to buyers
 Steering is often used by housing providers who are seeking to unlawfully create an "adults only" community (Familial Status Violation).
 Steering minorities to certain areas only.
 Subsidized housing is always targeting the homeless to live in the lower income areas based on the "market rate" for subsidizing housing whether it is temporary or permanent
 the same as above. More than 2 or 3 kids
 The steering of homebuyers to certain counties or certain areas of town based on the "schools reputation". School reputation is coded language for race
 This survey is very confusing. What do these phrases mean?
 Yes not showing homes because of previous address

Table B.9
Are you aware of any questionable practices or barriers to fair housing choice in the mortgage and home lending industry?

The State of North Carolina
 2015 Fair Housing Survey Data

Comments:
discriminating against individuals who lost their homes based on lack of employment Embedded discrimination occurs for racial minorities along with stereotyping. Government Regulations Hard to hearing complaints that if a home needs some improvements, then the loan is disapproved. complaints that lenders are more willing to lend for new homes. High risk for payment Higher interest and more flexible loans available to whites and males. Access to loan agents in a timely fashion. higher interest rates to racial minorities higher rates and taking advantage of women, single person households I am a woman and a minority. I FEEL LIKE WOMEN ARE TAKING ADVANTAGE OF BECAUSE THEY ARE NAIVE AND ARE NOT FAMILIAR WITH THE STOCK MARKET/RATES/ AND RIGHTS I know of the Bank of America/Countrywide settlement about this. I know that black friends of mine have had to meet more onerous standards to borrow money. I learned from a Housing Coalition survey that this is a practice. I personally experienced high interest rates because we are Black. I would suspect that persons with lower credit scores are predominantly and disproportionately persons of color and/or women I've read about cases, but don't know anything personally. In many cases of clients coming in to seek mortgage assistance, single women and minorities do seem to have higher interest rates than other customers. I have seen several recent loan modifications that had staggeringly high interest rates for minority borrowers where the terms were extended, but the interest rate was left untouched. INCOME BASED ON GROSS VS. NET Income is measured primarily by full time employment, regardless of net income; full time employment is increasingly difficult to obtain for minority groups and younger generations. Interest rates based on race. ITIN individuals have extremely limited options. (High rates and ARMs) Lack of knowledge and fear. Lenders giving higher interest rates to non-Caucasians low income individuals not getting opportunities to buy homes Many women and minorities are offered much higher rates; women are often told to bring their husbands or male partners to discussions. minorities denied mortgages Minorities have a much difficult time getting mortgages. My ex before I became homeless experienced this personally none specifically, but it happens Not giving loans to minorities. Often see higher interest rates for female and minority clients seeking mortgage assistance. Originators are not drawn to sell lower price homes due to making a bigger commission on more expensive homes. Thus less choice in how they are helped and by whom. People of color are at risk of being offered higher interest rate loans, or not being offered mortgages at all. Also, people of color aren't given the information or opportunity to participate in these processes. People of color may be found to be just as responsible in paying bills Predatory lending practices have been used to qualify minority applicants even though they may qualify for a lower rate.

Prey on those with bad credit
 Race discrimination in this industry is a huge barrier for minority persons to get approved
 red lining
 requiring extremely high credit scores excludes low to moderate income families from home ownership opportunities
 Restricting builders who would prefer to build affordable housing from obtaining loans effectively discriminates against lower income homeseekers.
 Settlements awarded in area for bad lending. Bank Central in Charlotte
 Single women with children usually get higher rate,because they can't afford the high interest. So they have to do what they have to do at the time.
 some of my clients have complained about this not sure if it's a fact.
 The foreclosure crisis disproportionately affected women and people of color. Several studies have shown that those demographics were offered more risky mortgage products than whites, even when their incomes and credit scores were the same
 There have been many practices uncovered through the years from charging certain classes higher interest,to discriminating due to race, to allowing someone to purchase/finance a house they are upside down in....
 This could result in woman and minorities having credit issues or lower wages. Some woman may be divorcing or widowed resulting in less income in the household resulting in credit issues and many minorities don't have equal pay as their white counterparts making lending opportunities more strenuous.
 This is done so undercover that it is hard to detect or prove.
 Wells Fargo lending practices
 Women and other minorities are overlooked for fair housing opportunities
 Women, especially single women, can have a hard time.
 Yes, a situation in which a woman with children was charged an increased interest because she had kids but was counted as an insurance charge.

Table B.10
Are you aware of any questionable practices or barriers to fair housing choice in the housing construction or accessible housing design fields?

The State of North Carolina
 2015 Fair Housing Survey Data

Comments:

-inherently older properties have severe hardships when meeting accessibility requirements.
 Bldg code should cover this. But if developer knows an elected official shit gets stirred
 Code and federal requirements are enforced in our county--based on my experience. There is very minimal building due to economy.
 Concentrating affordable housing complexes in areas that further concentrate racial and economic segregation.
 Even though new construction is supposed to be built accessible to all...to many are NOT following
 Failure to design and construct multi-family dwellings to meet disability accessibility standards.
 Government Regulations
 handicapped units not leased to handicapped residents and charging higher rent for them as well
 have had complaints about that in the past
 Homes and apartments built for low income have no access to outdoor living.
 Inconsistent enforcement of ADA standards/building codes can severely restrict housing choice for disabled persons.
 Just based on observation, many of the new developments do not have units specifically designed to accommodate people with disabilities, or when they do, there are other barriers to living there such as transportation, parking, etc.
 Limited number available units for wheelchair bound individuals.
 limits accessibility and choices
 Many apartment complexes, especially older ones, don't have roll-in showers, or other accommodations to really meet the needs of someone who uses a larger power wheelchair - even in their "accessible" units.
 Most housing being built seem to rarely have persons with disabilities in mind.
 Not enough accessible housing
 Nothing really, but we include a resort area, a large portion of our region makes it virtually impossible to build homes the locals can afford.
PROBABLY 95 % ARE AND ONLY A COUPLE SET ASIDE FOR THOSE WITH DISABILITIES
 Profile applicants
 There has been an influx of new homes built in the Asheville area that have this "green" model -- however, they do not at all appear accessible. With an ever-increasing lack of affordable housing, the City tries to encourage the development of smaller "accessory" housing units, many of which are around 800sqft. It is very unlikely that these accessory units will be able to be accessible being so small. This will further segregate people with disabilities.
 There is an ableist element in the planning, design and implementation of new homes.
 Usually handicap facilities are set up separately
 Yes, I have some clients who wheelchair bound and have many obstacles in the substandard housing they are provided

Table B.11
Are you aware of any questionable practices or barriers to fair housing choice in the home insurance industry?

The State of North Carolina
 2015 Fair Housing Survey Data

Comments:
Charging high insurance premiums, often to people who speak little English, and requiring them to sign a "Consent to Rate" form. charging higher rates for certain types of homes or older homes Covertly based on zip codes which may be heavily populated with minorities. This is disguised as risk but designed to continue oppression. Difficulty in being able to find an insurer will obviously disqualify certain perfectly capable people from buying in certain area or a given price range Government Regulations However, higher rates based on proximity to certain hi-risk areas will result in higher rates. I don't like that a person has their credit checked to set the rate for their homeowners insurance. language barrier Minorities are sometime denied insurances due to credit issues or given higher rates resulting in financial burden. Minority groups may be charged higher insurance premiums, or be denied coverage because their property is located in a high crime, or low property value neighborhood. red-lining Yes! Personal experience

Table B.12
Are you aware of any questionable practices or barriers to fair housing choice in the home appraisal industry?

The State of North Carolina
 2015 Fair Housing Survey Data

Comments:
African American neighborhoods are often appraised for less than comparable white neighborhoods Black and Hispanic homeowners are more likely to receive a lower property value appraisal than White homeowners. But, most of the region is low minority, so there are very few neighborhoods comprised primarily of racial or ethnic minorities. also, our CMSs only allow for recognition of Hispanic as an ethnicity, so it is virtually impossible to track most ethnicities. Devaluing certain areas based on race. Government Regulations Home values are much lower in communities of color. However, the cost of living throughout the City is continuing the rise, which causes property taxes to rise. This rising of property taxes causes people of color to no longer be able to afford their homes that they have had for decades. home values being based on race and ethnicity of neighbors Houses located in predominately African American neighborhood tend to have less values compared to the same homes in other areas. I have also seen that houses even in a predominately White neighborhood, if the owners of the home are African-American, the value of the home is decreased compared to the other homes in the same neighborhood. I am quite certain that pricing is based on location. When we were looking for a house to buy, it was much less expensive for the same quality and size in black neighborhoods. I have seen home prices in minority neighborhoods appraise lower than the same home in the same condition in non-minority neighborhoods. I have seen numerous instances where houses seemed devalued because of the ethnic makeup of a neighborhood, or comparables were unreasonable. I was sent a notice that my property had been re-assessed and that due to the "changing cultural climate" of the neighboring complexes in the past year my proverty value had gone down, and that this was forecasted to continue. loss of property value in African American or Hispanic communities Many times minorities are forced to buy less house in a suburban neighborhood or buy more house in a urban neighborhood in order to accommodate family size and situations. A smaller house in a suburban neighborhood may appraise a lot higher than a larger house in an urban neighborhood just because of the neighborhood ethnic composition. May lead to unfairly devaluing the true worth of a given property only because of ethnic makeup problem when using comps problem with comps Profiling red-lining some areas recently had property values decreased through reappraisals the example given is the only one I can come up with There is a perception in our area that this practice persists VALUES GOES DOWN WHEN THE ETHNIC COMPOSTION CHANGES While shopping for a home last year I noticed that real estate prices were significantly cheaper in african american communities.

Table B.13
Are you aware of any questionable practices or barriers to fair housing choice in any other housing services?

The State of North Carolina
 2015 Fair Housing Survey Data

Comments:
<p>1. Housing available to ex-offenders though they have worked hard to get past their past. 2. Prior evictions - used as a WHIP to avoid giving housing. Debts have been satisfied and in many cases, years have gone by but no matter how long or how better established an individual or family has become, the eviction is used against them because of the law that allows it to stay on a credit history (not a criminal history) for a lifetime. This needs to be revisited to give room for recovery and not be a 'life' sentence.</p> <p>Affordable housing with subsidized rents do not have include units for families with children and are usually limited to two bedrooms this includes tax credit properties, NCHFA, and HOME Funded.</p> <p>building majority rental housing in poor communities of color</p> <p>Contractors and home repair professionals often quote different prices for equivalent work, seemingly based on race and gender. I don't think most know they are covered by fair housing laws.</p> <p>Durham Housing Authority! Same as answer above.</p> <p>Government assistance programs that will not allow program funds to be spent on mobile homes. In other words, if residential dwellings are not on a permanent foundation, many times the folks are ineligible for government funded repair programs.</p> <p>Government Regulations</p> <p>I could see a private sector landlord not wanting to rent to a disabled person thinking that the potential reasonable accommodations won't be so reasonable. Or possibly that there would be requests for the landlord to come over and help move furniture or perform services out of the scope of the landlord/renter relationship.</p> <p>I have seen in the news media that some renters are not treated as fairly as others.</p> <p>I've read the national studies showing that black and latino applicants with similar incomes pay more for their homes than whites. My best guess is that white realtors spend more time and work harder for those they are comfortable spending time with (whites).</p> <p>Lack of affordable housing</p> <p>lack of swimming pools or exercise facilities in poorer communities</p> <p>limited section 8 options</p> <p>local shelters only allow homeless that have id and gov't documents</p> <p>no renting to anyone with a criminal record (felony) no renting to folks with bad credit</p> <p>Not enough affordable housing, and subsidies de facto apply only to low-income properties -- you rarely see subsidies high enough to attract property managers in white or high-income neighborhoods with good schools, safer environments. Found a bullet casing yesterday in a parking lot of low-rent apartment complex.</p> <p>Persons who have a felony criminal record are often denied housing even though the conviction occurred years ago.</p> <p>red-lining</p> <p>Rental prices are based off of Military's ability to pay rent, etc. Limits clients with little to no income.</p> <p>Rezoning can be tabled by a town council to effectively kill a LIHTC development. This happens more in rural communities.</p> <p>The limited amount of affordable housing and the fact that it is only available to the chronically homeless.</p> <p>Very limited availability of handicapped accessible apartments</p> <p>We just have limited affordable housing for our families. We need more that are within our city limits, are on a bus line.</p>

FAIR HOUSING IN THE PUBLIC SECTOR

Table B.14
Are you aware of any questionable practices or barriers to fair housing choice in land use policies?

The State of North Carolina
 2015 Fair Housing Survey Data

Comments:
<p>..... Policies that don't permit multi-family housing in certain upper class areas.</p> <p>CDBG's are used in the areas that often need it least. Areas with the strongest tax bases in Western NC still secure more additional funding than neighborhoods who have a greater need.</p> <p>certain land lords only allow certain things on their property and charge more when you have more on their property</p> <p>Difficulty in building affordable properties around the state, NIMBY</p> <p>educating communities about "low income" housing</p> <p>Exclusionary Zoning laws impede the availability of housing.</p> <p>Housing that is built outside of public transportation routes precluding the ability to access transportation to jobs, shopping, doctors etc.</p> <p>I believe there are some communities that in there bylaws might limit the minimum size a house can be thus decreasing the degree of concentration of houses I.e. fewer do to larger size requirement</p> <p>I have witnessed municipal planning boards exhibit discrimination when approving multi-family housing site plans for certain areas of the town/city that might be considered more valuable.</p> <p>In my area, smaller towns seem to reject affordable housing.</p> <p>It is hard to get multi-family housing in some areas of the county.</p> <p>It seems as if zoning practices are used to place more people in certain zip codes and the customary practice of having new construction to fit the likeness of existing housing is ignored.</p> <p>limit accessibility, restrict development of mixed use housing</p> <p>limits mixed use housing in neighborhoods</p>

little commitment on the part of cities and suburban towns to designate land outside core areas for multi-family uses
 local Government Land Uses plans should offer choices of different types of housing throughout their community based on the demographics of their community.
 local governments giving better rates to companies looking to construct low income housing in minority neighborhoods
 Many municipalities group the poor into specific areas.
 multi-family in traditional African-American neighborhoods. Difficult to develop in other areas of town due to greatly increased land prices
 Multifamily - especially low income multifamily - housing is concentrated in poorer or more rural communities
 No inclusive zoning, only mixed use
 No one really wants low income housing nearby.
 Objections to multifamily housing in certain areas.
 Often times the lowest cost land is in the most economic depressed areas. This concentrates low income housing
 ordinances allowing multi-family in certain zoning districts and public hearings are required for the permits; therefore the process for permit approval contains lay opinions and generalized fears.
 Placing unwanted and toxic items near minority areas.
 Public housing is separate from the rest of the community.
 Relegating public housing to areas with higher rates of industrial use and pollution or higher traffic areas.
 requiring large lots is an exclusionary practice; not giving municipalities express authority for a mandatory inclusionary program equals exclusion of minorities; MF allowed only in certain locations
 rezoning sites in favorable neighborhoods to higher densities
 same as answer from first page.
 Same as stated before
 Shelters
 Shortage of mixed-income housing
 Some areas will not allow for low income housing to be built
 Tabling, refusing to discuss, rezoning requests for LIHTC developments to avoid outright denial in certain areas.
 The lack of state CDBG funding for affordable housing multifamily projects forces developers to cram as many apartments into developments as possible in order to make the project profitable. I would suspect that new elderly housing projects are filled partially with non-elderly or non-disabled persons.
 The less-than-fair competition previously cited extends to both recreation/second home-owners and education facilities to the disadvantage to those depending on the local job market for their ability to purchase.
THERE ARE JUST NO ENOUGH HOMES FOR OUR FAMILIES - MAINLY WOMEN AND CHILDREN
 There are land use policies in Union County that make it very difficult for Habitat affiliates to build in certain areas of the county. The land use policies stipulate house size and style which does not allow lower-income families to live in many areas.
 Town regulations can be extremely onerous and expensive, essentially pricing affordable housing out of their communities.
 We need more mixed income development and land policies that require it.
 Within a certain radius
 Zoning and design review boards often aren't trained in fair housing

Table B.15

Are you aware of any questionable practices or barriers to fair housing choice in zoning laws?

The State of North Carolina
 2015 Fair Housing Survey Data

Comments:

Appears to depend on racial and socioeconomic makeup of area where the group home wishes to go.
 Areas zoned for single family may indeed zone out the development of group homes in this area. I feel sure this happens all across the state
 Certain neighborhoods do not want transitional housing or group homes in their neighborhood.
 City needs inclusionary zoning laws
 Corruption in politics likely determines zoning and building.
 Distance requirements for large group homes.
 Distance requirements limit the placement of group homes. This limits the number of housing options and locations that people have access to.
 Do not want group homes in certain neighborhoods.
 Exclusionary Zoning laws impede the availability of housing.
 Greenville will only allow group homes in certain areas.
 Group homes are kept far, far away from affluent neighborhoods; Section 8 housing is far, far away from affluent neighborhoods.
 Group homes have separation requirement
 Group homes must not be located within certain distances from other group homes.
 Homeless shelter cannot be within 75 feet of a regular residential area.... City has waived that requirement, but some businesses are fighting it.
 I have witnessed municipal zoning decisions that appeared discriminatory when re-zoning requests were made for certain types of housing in areas of the town/city that might be considered more valuable.
 I know of people who have tried to open group homes...and fought by "ordinances" to keep them out of neighborhoods!
 I understand there is a case here in Wilmington and group homes are being discussed.
 In Asheville, our zoning and density laws perpetuate segregation by limiting multi-family housing in neighborhoods where it "doesn't fit." While minor efforts have been made to increase density, this has only been done along very limited bus lines.
 Inclusionary zoning could help encourage developers and neighborhoods to created affordable housing.
 It is difficult to impossible to secure rezoning to higher densities in desirable neighborhoods.
 It is nearly impossible to build/establish shelters for those experiencing homelessness due to the NIMBY pushback that is always quick and powerful.
 Jackson County NC has multiple zoning districts, some of which try to limit development types such a group homes.

JACKSONVILLE, NC
 laws that restrict number of units per acre, low density requirement, max square footage requirements
 limitations on districts allowing manufactured housing limited opportunity for mixed-use development and lack of provisions to encourage mixed income developments
 limits accessibility
 limits accessibility and mixed-use housing
 Many towns/cities have restrictions on proximity of group homes, and this prevents people with disabilities from living in the the neighborhoods on their choice.
 many zoning laws have the effect of keeping the best land for use by the economically advantaged.
 Minimum lot restrictions
 need more mixed-use mixed income, also zoning seems always to place low-income residential near industrial and business zones, but high-income residential is just large swaths of residential.
 No group homes allowed in town
 restrict placement of homeless shelter sites, unable to house multiple families in housing donated for such.
 same as above
 Same as in Question 1. Additionally, changes from R-6 or R-10 to R20 seems to be done more often in zip codes where there is a higher concentration of low income families and/or minorities.
 Separation requirements in single family neighborhoods
 several articles in local papers about people not wanting them in their neighborhood
 Shelters
 Some laws in a given area may not allow group house for fear of devaluing a given property
 The zoning ordinance places a siting buffer on group homes that is consistent with state law but inconsistent with the Fair Housing Act.
 there are situations where there is a 500-foot separation required between group homes. Zoning districts controlling the type of housing choice.
 There are zoning laws such as the 10-10-10 rules in the City of Monroe that make things difficult for our Habitat affiliate to build in certain communities.
 There should not be laws that restrict group homes to specific distances from other group homes
 This may be the case in some smaller communities.
 Very hard to build a shelter- very few zoning for transitional or homeless shelters
 We have had several situations arise where neighborhoods have protested group home zoning. It seems as if there is always another reason for the denial of zoning, but in other cases those reasons don't exist.
 We have very few group homes
 Western NC is largely un-zoned, leaving wealth to determine land use.
 Within a certain radius
 Zoning allows group homes of more than six residents to be restricted to certain districts. I actually think this is a good thing, instead of a barrier, because it keeps group homes in higher populated areas with sidewalks, parks, and other public amenities.
 Zoning areas for group homes are decreased because no one wants a group home in their neighborhood.
 Zoning laws everywhere I've lived made some areas single family and other areas multi-family. This is more to protect the investment of home buyers rather than to limit options for renters.
 Zoning reinforces community objections to multifamily housing.
 Zoning rules in Wilmington restrict how close facilities and/or shelters can be to each other.

Table B.16
Are you aware of any questionable practices or barriers to fair housing choice in occupancy standards or health and safety codes?

The State of North Carolina
 2015 Fair Housing Survey Data

Comments:

A few years ago, NC pass a law prohibiting local governments from passing law allowing for inspections without a complaint. The complaint-based system open up already vulnerable tenants (undocumented, minorities) to illegal retaliation from landlords.
 Absentee Landlords and unwillingness of municipalities to enforce codes as well as use their power of eminent domain contribute to the decay of these lower income and immigrant neighborhoods.
 Allowing overcrowding might be discouraged, again devaluing property and perhaps might be more attractive to certain ethnic groups also, leading to probable devaluation of a given property
 as stated above in the example
 Because there is no formal law regarding occupancy standards, some landlords look the other way on how many occupants are in a unit as long as rent is paid on time.
 Case in Greensboro renting substandard properties to immigrants
 enforcement of minimum housing and NC Building Codes is not required for occupancy of a rental or of a home purchase. many homes are being occupied that may contain code violations.
 Especially in the farm community
 Fear of retaliation stops some people from reporting inadequate repair practices or unhealthy living conditions especially when landlords realize that folks don't know their rights as a tenant. It seems that fair housing education and city inspection requirements are taught at seminars and workshops attended by service providers but seldom taught at a grassroot level at times and places that would allow these individuals to participate or use/development of other means to get the info to families..
 Few unrelated people allowed to share housing.
 Health and safety codes are designed to protect lower-income renters from landlords trying to keep their costs at a minimum. Little code enforcement is done in higher-income owner-occupied neighborhoods.
 housing inspections very slow in certain parts of county
 I answered this "yes" simply because the minimum housing code has become "complaint" driven only, which scares many tenants to report for fear of losing housing.

I have observed code violations continue to go unaddressed in communities where there is a concentration of poorer residents and primarily African American.

I have seen and intervened in situations near the Chapel Hill area where landlords refused to give a copy of the rental agreement so that they could change the "rules" at any moment, seemingly on a whim, by charging made up fees all with the threat that they would call and have them deported (the renters were Hispanic).

I was just told today about a housing situation that was reported to the landlord, where the tenant was forced to live with human feces in her bathtub, backed up from plumbing that long since was not up to code!

In poorer latino neighborhoods, substandard housing goes unreported for fear of eviction.

It is very hard for a landlord to monitor and enforce this, but it happens. Again, I am sure this happens all across the state but is probably more prevalent with concentrations of minorities and immigrant renters.

Lack of code enforcement and minimal housing code in rural areas.

Little oversight
lowers housing standards
Many communities don't enforce housing codes.
minorities not being welcomed
Most of low-income housing does not meet basic inspections codes
Our codes are inadequately enforced because we do not have resources to offer people alternatives
People do not know who to call to report this. I am not sure that local codes support the enforcement of this.
Poor communities need more regular inspections that hold landlord to a higher standard.
Shelters aren't required to have health inspections. In many neighborhoods, violations don't get reported b/c there is nowhere else for a family to live.

SOME AREAS FOR LOWER INCOME CAN HAVE SAFETY ISSUES THAT GO IGNORED WHEN SOME HIGHER INCOME AREAS HAVE TO MEET HIGHER STANDARDS...AND LOWER INCOME ARE AFRAID OF EVICTION OR THREATS
some city and county building codes are absolutely ridiculous and are NOT consistent from one county and city to another. in our city, the city fire marshall has a seperate building code than the county code(state code) enforced by code enforcement
Some homes are have six people living in a two bedroom with poor living conditions
Sounds like a Northeast United States Problem. Slumlords won't make it down here.
There are no standard housing codes in some of the counties, therefore, landlords rent substandard housing to lots of immigrants.
There were several apartments I visited that were either private or public that were covered in roaches and not properly taken care of. Should have been deemed unsafe to live in some cases.
This goes both ways-- enforcement that is too strict will deter reporting because the folks living in substandard conditions often have no where else to go
Too many families and individuals live in substandard conditions. Because of limited options of rentals,they don't complain and are fearful of the repercussions if they address there landlord.
When I volunteered going door to door to speak to Latinos about their housing, often they spoke of renting a place and arriving with the apartment dirty. When windows or appliances were broken and they asked for the landlord to fix them, they were charged for something that they did not create. Apartments lack carbon monoxide detectors and Latinos are accustomed to burning charcoal in their homes back in their old country. Other apartments suffer from mold infestation.
Yell loud and you get attention for someone else's property; demolition days

Table B.17

Are you aware of any questionable practices or barriers to fair housing choice in property tax policies?

The State of North Carolina
2015 Fair Housing Survey Data

Comments:

All I see or hear about is tax incentives for wealthy!
as stated in the example above
decrease development of properties and therefore limits housing options
ethnic areas and lower property values
Hard to find affordable carpenters to build this
I am unaware of tax incentives for this. However, my focus is non-profit.
If you are a veteran u should automatically get a property tax break
limits development in rural area for this population
Many of the large property management organizations don't really allow for reasonable accommodations. They will accept the accommodation request if its dealing with a credit or criminal issue but rarely budge outside of their company perimeters. In regards to modifications of a unit if there is an agency working with the tenant and property management feels a fair housing issue may arise they will comply.
Might hinder disabled from buying property due to prohibitive costs to remodel to appropriate suitability for use
No outreach is made to offer education on how to best maneuver this complicated process for those with less time or education to approach the process with.
Not that I am aware of.
Some landlords cannot afford to make reasonable accomodations
Tax churches over a certain capacity. Ministers driving phat rides. Disgusting.
TAXES HAS ALOT TO DO WITH IT
The cost of installing elevators and ramps can be prohibitive.
There is really no program that a person with a disability can get help with home modification or accomodations so they can live comfortably in their home.
there should be a tax incentive if the landlord modifies housing to accommodate someone with a disability
There was a lot of trouble based on how quickly property values climbed or declined throughout the region vs how quickly tax values were reassessed, but this seems to have been a general trend as opposed to anything affecting any marginalized group.

Table B.18
Are you aware of any questionable practices or barriers to fair housing choice in the permitting process?

The State of North Carolina
 2015 Fair Housing Survey Data

Comments:
<p>All documentation should be provided in English only and an interpreter should be provided if necessary. Could lead to confusion, misunderstanding of certain things, becoming problematic later I am not aware of any documents printed in other languages in permitting office. However, interpreter services are available. I don't see internal documentation translated to spanish for my spansih speaking residents. I usually use Google Translate to communicate with residents on procedure, etc. and hope that the translation is accurate. In english only many applications for housing is not in Spanish. Most housing agencies in WNC offer applications in Spanish and bi-lingual staff . Rental agreements are often offered in English only and there is no effort to make certain they are understood before they are signed, even if it is clear that the person does not speak English well. Some efforts. Not consistent nor reasonable There are some documents in Spanish, but we have many other nationalities here in North Carolina</p>

Table B.19
Are you aware of any questionable practices or barriers to fair housing choice in housing construction standards?

The State of North Carolina
 2015 Fair Housing Survey Data

Comments:
<p>and horrible inspection follow-thru Bldg code not adhered to with consistency Boarding houses are particularly deplorable and often unregulated. Certain standards may be in place for certain material that might not be allowed and perhaps rules may be in place that may not allow deviation from a certain style of house in a given community Chapter 42 of NCGS is not made accessible for people to demand these standards. Construction seems to go appropriately despite our steep terrain, but upfitting of existing rental stock, as mentioned, needs some education. continious changing of building codes different standards for installation of handicap ramps in the city vs installation of a ramp in a home located in the county. Guidelines are extremely confusing and so subjective. I think there is inconsistency with interpretation and enforcement of building codes from county to county! Many guidelines are confusing New construction does not really seem to take into account the realistic needs for housing constructed with disability in mind. Permitting and inspectors are arbitrary. Different inspectors ask for different things. Rules are very complex and sometimes change after the building begins Some properties have poorly placed designated parking for people with disabilities. I have seen designated spaces immediately next to a large planter which impedes exiting and entering a vehicle. SOMETIMES EXITS ARE NOT FEASIBLE FOR EVERYONE TO REACH State level policies restrict buiding of tiny homes. Some fire regulations make affordable rental units out of reach for landlords seeking to run boarding houses. We witness this in rural counties in the western part of NC on a regular basis. Typically, the inspectors are one or two person offices that are staffed by individuals that take advantage of the power they have to interpret the standards when inspecting new construction.</p>

Table B.20
Are you aware of any questionable practices or barriers to fair housing choice in neighborhood or community development policies?

The State of North Carolina
 2015 Fair Housing Survey Data

Comments:
<p>Again, mostly placed in one neighborhood due to high cost of land, etc. All over the State As mentioned in the zoning issue above, trying to restrict group homes in residential areas. Continuing to use HUD funding in the same areas of the city year after year. Others areas are distressed but without any attention. Exclusionary Zoning. Habitat for Humanity building in poor, crime ridden areas based on availability of inexpensive land HOA limiting the I don't think so, but our campus seems to have an extra edge in creating student housing of a nature that does not provide sufficient parking for those w/o access to student satellite lots. This could be a problem if the university declines or sees a rise in disabled students. It remains hard for students with families to find appropriate student based housing, which would not be such a problem if family-based housing also could compete in proximity to the university.</p>

I have heard of "Not In My Backyard".
 I love Habitat and non-profits, they must do things where the cheapest land or the donated land is. And because zoning and local policy affects land value, almost all low income people end up in concentrated areas. And it is through no fault of the Habitat or non-profit.
 Lack of Availability in Vance, Franklin, Warren Co NC Area. We need more complexes because the needs has greatly outgrown the availability.
 minimum lot sizes, expensive architectural requirements
 NIMBY-ism
 Our policies concentrate new affordable housing in a handful of struggling neighborhoods.
 Repeating #2, while minor efforts have been made to increase density, this has only be done along very limited bus lines.
 Restricting affordable housing in certain locations
 restrict access
 rezoning to higher densities often impossible
 see previous comments
 targetting funds for affordable housing exclusively to high poverty neighborhoods lack of incentives for private rental complexes to accept moderate or low income households and voucher holders.
 The "development" and "improvement" should impact the entire community; rarely does it.
 The absence of a public policy that results in the creation of affordable housing in higher opportunity areas.
 There are special use districts in parts of Monroe that will not allow our Habitat affiliate to build in that area due to the rules and regulations for specific areas.
 There is a tendency to talk to neighborhoods after decisions have been made.
 They simply aren't used in the communities that need them most. They are often abused or mishandled (TIFS, ending revolving loan programs. Etc.).
 too much new construction in the affluent west Burlington area

Table B.21
Are you aware of any barriers that limit access to government services, such as a lack of transportation or employment services?

The State of North Carolina
 2015 Fair Housing Survey Data

Comments:

affordable housing tends to be away from the center of cities in this state and transportation services rarely stretch beyond the center of cities or the downtown area.
 Affordable land is not always near transportation services, impeding the building of affordable houses.
 Apparently if you are disabled you can't receive half-priced bus pass and Transaid. Getting to a doctors appointment and wanting to go buy groceries would require access to both.
 bus and train lines should connect new neighborhoods to work centers
 bus only goes so far and not after a certain
 Bus service does not extend to areas of the city that are developing, where there are more jobs being created. Access to vocational rehabilitation services is a lengthy process and confusing for many people during the first few steps.
 Certainly lack of transportation is a consistent issue for low-income populations across the state
 city and county public transportation is limited.
 confusion about how to access services. Some services not user friendly- such as staff who are disrespectful to those seeking services
 Depending on the location of the services, many individuals have a problem accessing services because of being in really rural areas. No way to get to appointments or find work which is required in order to receive some federal assistance.
 For example, like, many of our clients struggle to get to town to have a job and receive services.
 For rural areas within counties, access via transportation is always and issue. Specifically, for those within those areas at risk of becoming homeless there is little or no access to service within their geographic area. They must travel to the county seat to access services.
 Government employees level of helpfulness and attitudes. Shortened hours and excessive wait times. 9-4 is unacceptable. Low income people shouldn't have to take off work to wait for hours to take care of paperwork, evaluations, etc. No issue with employment services. Plenty of places are hiring and unemployment can be filed online last I heard. If you can't find a job, you aren't trying or won't accept what is available.
 I depend on WSTA public transportation, and they are considering changing the routes, which will sorely limit we the poor or homeless access to places we need to be!
 I have heard of some public transportation not offering transportation to someone that needs assistance in loading and unloading wheel chairs.
 I live in a neighborhood that is lower middle class. On the backside of that neighborhood are several diverse communities, specifically with Latino families. The public bus used to run through the neighborhood on a main road. Now, the route has been removed (not changed) completely from the transportation routes. Some families may have to walk substantially to get to the bus station at the front end of the neighborhood. Because there is no grocery store within 3 miles of some of those homes, shopping for essentials has become a huge issue. The only store is a little mom and pop type convenience store with prices much higher than a grocer.
 i understand that all section 8 applicants must apply "on line", though i am not sure this is true. if it is, it is certainly a barrier to those who do not have access to a computer or who lack the knowledge to operate one.
 if you live in a very rural area with no public transportation, gas is expensive to get to services and stores but you may continue to want to live way out in the country. You may choose it but it is a problem.
 In rural areas there is a severe lack of transportation in particular for people with disabilities and low-income households. This impedes a person's ability to work, attend medical appointments, participate in community activities, etc.
 It's NC, so public transportation is not adequate in many areas. Limited range of service.
 Lack of bus routes in some areas

Lack of education of general public relating how to obtain help. Not knowing whom the correct person to speak to

Lack of public transportation

lack of public transportation especially outside the major urban areas of the state

lack of public transportation in urban and rural areas

lack of public transportation; lack of pedestrian sidewalks; lack of accessible crossing at intersections

lack of translators fear of government from lack of knowledge lack of transportation is the main barrier

Lack of transportation is a huge barrier, particularly in rural areas of the state.

Lack of transportation is a large barrier in rural counties in North Carolina.

Lack of transportation is a major issue for people with disabilities being able to access government services.

Lack of transportation, and the people have to stay on the bus all day before they go home

language barriers, complexity of locating specific departments that might offer assistance.

limitations on transit routes to connect lower-income neighborhoods and employment opportunities. limited hours of bus services

Limited public transportation in New Hanover County

location of housing deters access to education, jobs, services

Many towns surrounding Raleigh lack internal transportation systems, and when these government services are not offered in that particular town or regionalized, residents must do without or pay money they don't have to spend using transportation services (i.e., a taxi) to get to services. This is a huge issue for areas surrounding Raleigh and for some areas within Raleigh that don't have city bus service in close proximity especially impacting the elderly, parents with small children, etc.)

No public transportation in many small Counties in NC. This is a major barrier.

No public transportation in our county

no public transportation in the area.lack of funding for low income transportation

No public transportation system in Alamance County

no public transportation in western north carolina, the restructuring of the former NC Employment Security Commission has been a disaster in many counties

Our area has no public transportation system which impedes all other aspects in daily living. If you don't have a car or someone who is willing to take you on their vehicle, you are not able to go the store, shopping, social services, access employment services, or even see your doctor.

Our area is sem-rural, so transportation and other services are limited.

Our city does not have any public bus community transit and very limited out of town bus transit

People in rural areas often do not have transportation to access government agencies or sufficient employment opportunities

poor public transportation available

Poor public transportation Orange Co. to attend the County's evening board meetings held in Hillsborough.

poor public transportation

Public housing was left out when survey door to change the bus routes, and they are the group who depends on this service for jobs, groceries, healthcare. They need to be considered the most in decisions made .

Public Transportation in Rural devolvement areas

Public transportation in small towns constitutes a shifting target. With few riders, buses tend to have a high per-rider cost, and routes become fixed even as demographics and commuting routes change.

Public transportation is abysmal.

Public transportation is supported with limited funding, seniors most impacted; crappy crosswalks in high volume pedestrian routes

Public transportation routes throughout the City.

Raleigh has inadequate public transit

Rural areas do not have access to public transportation making necessary appointments, employment, etc., difficult to get to where is needed.

Since the majority of the state is rural access to services outside of metro areas remains an issue.

SOME AREAS ARE EQUIPPED WITH BUS SERVICES AND SOME ARENT

Statewide, in most rural communities, there is inadequate public transport and options that exist have significant time-constraints. (eg a single disabled person without a strong social network may be able to use an on-call service funded by Voc-Rehab, but still have to commit 3+ hours for a half hour appointment with no guarantee the service will get him/her there on time to keep the appointment.) This sort limits access to governmental, non-profit, and health related services. Those without access to assistance groups to cover the cost may not have the option at all, and those with limited resources may also be dependent upon such services for access employment.

The bus service does not go to certain parts of Jacksonville especially the county. Making it extremely hard for some people to get around to government agencies and employment.

The bus system needs to extend to the county

The lack of public transportation in this area is a distinct barrier to greater integration of many neighborhoods.

The lack of public transportation severely impacts housing choice for those persons that cannot or do not drive or own vehicles.

The VA and Social Security offices are located in Durham (none in Orange County) and clients with no income cannot pay to ride the TTA bus to Durham.

There is a need for expanded public transportation to provide lower income residents with access to higher opportunity areas and community assets.

There is a very high unemployment rate for persons with disabilities. And some of the reasons are: lack of transportation and support networks to help gain government access to goods and services.

Transit system is very limited in Jacksonville. Many areas are not covered and residents without transportation have a difficult time accessing needed services.

Transportation

Transportation and education

transportation for elderly

Transportation is a barrier for people with disabilities in several communities - Lack of and cost of transportation

Transportation is a barrier in all rural areas in WNC.

Transportation is a HUGE barrier for families. Buses take forever and is very difficult with families with children.

Transportation is a major issue in some counties. There is no public transportation therefore, getting to a job is a barrier. When we survey the community lack of transportation was high on the list.

Transportation is always an issue if one does not own a car in NC.
 Transportation outside of the city limits is limited and infrequent, if available at all. Individuals have to plan an entire day in order to access appropriate services if they don't live close by.
 Transportation services are provided locally but routes are limited. Working to expand them. Existing routes are targeted at key areas such as government services or employment services.
 Transportation, time, patience, employees in the public sector who treat their work as a job rather than a service.
 Unemployed homeless persons do not have adequate access to the state employment provider b/c it is off the bus route.
 Very difficulty of clients to access transportation in rural areas
 Very limited public transportation here, that is not accessible to families with multiple children (not enough seats in vans for car seats)
 Warren County is a rural county with limited modes of transportation. Individuals who may not have personal vehicles or access to other modes of transportation may have limited access to government services.
 We are a rural town, but many people don't have transportation or cant afford. It would be nice if we could have some type of affordable bus system.
 We are rural and there is limited transportation due to community resources
 While transportation may not be lacking, it can be difficult, with multiple lines that need to be accessed, and with the limited time schedule, access to services may be very difficult.
 With cut backs in the Federal Govt. it is quite difficult for residents to obtain a Benefit Letter when they need to verify their income for housing recertification. The ones who have transportation to go to the SS office report several hours wait time. They tell them they can go online and sign up for an account. About 75% of seniors I deal with are not computer literate.
 Yes, certain areas there is no public transportation and resources are very limited based on affordability which limits social engagement and employment opportunities.
 yes, our suburban style of development that depends on the car/mass transit and the we don't provide adequate mass transit with sufficient trips rates.
 zip code

Table B.22

Are you aware of any questionable practices or barriers to fair housing choice in any other public administrative actions or regulations?

The State of North Carolina
 2015 Fair Housing Survey Data

Comments:

Again, I emphasize the issue of a "lifetime" sentence regarding evictions. Many were impacted by the economic slum that hit the U.S. Bailouts were given to banks and companies; however, many individuals are still suffering due to loss of employment, medical or mental/emotional health conditions that resulted from the fallout of the economy going downhill.
 Bureacracy at Housing Authority Winston-Salem is horrific. The staff has become jaded, most have NO clue what it is to have been homeless, how humiliating it is to need help, to sit across from someone that acts like they would prefer to be anywhere else in the world, vs doing their job with compassion and understanding!
 cities and housing authorities do not coordinate effectively on implementation of fair housing strategies (i.e. encouraging new apartment complexes to accept vouchers as a condition of zoning; making housing authority properties more accessible to transit.
 Complete silos
 Criminal records
 Durham Housing Authority might do a better job including persons with disabilities (per HUD regulations) in their application process.
 funding for low income services-food, transportation, medical appts.
 Group housing restrictions, counties without minimum housing standards
 Minimum wage and assessing credit reports in general are both hegemonic forces contributing to affordable housing issues.
 Systemic change is needed, not just in one area.
 Non-profit agencies and government agencies need to offer more information seminars at times that are conducive for the audience they want to reach. A lot of people have to work (e.g. 9 a.m. to 5 p.m.), have important appointments at work and still have to help their children with their homework and cook dinner. More information seminars need to be offered on the weekend and in the area where it is easily accessible for them in their own communities.
 None tht I am aware of
 not putting enough money toward dealing with these issues. It seems the current legislative bodies are intent on destroying any social network we have managed to coble together for low income/protected class peoples over the years.
 Often small towns restrict placement or refuse to allow affordable rental housing despite efforts to combat NIMBYism.
 Our city continues to tout affordable housing. A 1 bedroom apartment under their rules is close to \$700. That is not affordable for most of the people here who work full time. It also makes it incredibly hard for those receiving disability and SSI payments.
 Poor competency among those in charge of new and developing methods for alleviating currently existing barriers; those hired in the 80's and 90's no longer know how to approach solving these problems effectively.
 Public housing is complicated for clients to navigate; public housing has poor maintenance and inadequate number of units.
 Red tape. A person should be able to get someone on the phone, that works for the city or county, and is helpful, respectful, and knows the ins and outs of housing.
 Refusing to house those with criminal backgrounds.
 Restrictions put on being able to apply for subsidized housing due to criminal backgrounds and fair housing accommodations not being followed with housing authorities
 some phone systems are not user-friendly, at all, and make people want to hang up or give up, entirely
 The current political and social media climate does encourage the ignorant to discourage those deemed less valuable from even trying. I presume in some cases and areas this has turned into direct discrimination, but have had no observations locally come to my attention as of yet.
 The lack of affordable housing is a huge barrier. Therefore, lots of people live in substandard housng with high rent costs.
 The state's no longer providing single family rehab with CDBG funds will have a huge impact as LMI homeowners age in place.

Housing will deteriorate to a point statewide that overall safety of older and/or disabled persons will jeopardized. Tons of requirements such as using a registered vendor in some way when making renovations. Yes NC DHHS, US DHHS and HUD are the most discriminating public agencies in regards to housing for the disabled and special needs populations as a result of restricting their funding to specific housing. For example DHHS may refuse to fund housing that serves a disabled population with Medicaid/Medicare funds if that housing facility exceeds a certain number of bedrooms or units. This is definitely a choice limiting situation because persons with disabilities should have the opportunity to live in a larger housing complex rather than a 4 bedroom group home if they want to. Also larger housing complexes serving special need populations can offer more amenities and services than a 4 bedroom group home. Just like an apartment complex can offer an exercise room, pool, community room where the developer of a stand alone duplex can not afford those amenities. HUD by focusing its funding for homeless persons on permanent housing is discriminating against homeless persons who are able bodied and the disabled homeless person or person with a special need who may want to live in a transitional housing community where they receive assistance from providers as they prepare to transition to permanent housing by improving their economic situation or physical condition. The transitional housing provides the residents access and support to on site services not as available if they are isolated in an apartment and have to search for needed services in times of need. The VA's elimination of Transitional Housing for Veterans has been a big mistake. For veterans who can no longer choose that type of housing to help them recover from a physical or mental disability or help them assimilate back into the workforce as they go to school. Job training designed to accommodate a physical disability. HUD's lack of funding for the HUD202 program greatly discriminates against lower income seniors who have fewer housing choices today. Lower income seniors do not have options to improve their economic well being as they age. The LIHTC program does not offer rents low enough to help as many low income seniors.

C. MINUTES FROM 2015 FAIR HOUSING FORUMS

Benson Fair Housing Forum

Minutes from the Benson meeting could not be included due to technical difficulties.

Charlotte Fair Housing Forum

Comment 1: This is just an observation, but in your studies do you do any digging into maybe the accessibility regarding timing, because the general populations you are trying to reach don't work traditional banker hours or government hours. So, sometimes the ability for them to get access to these programs and knowing about them may be beyond their reach. Has that been a part of the investigation about timing?

Rob Gaudin: Not explicitly, no. The timing I am assuming you mean time of day, Monday through Friday banker hours 10 to 4 or whatever they are. The challenges in that also are simply having access to get there, mass transit, other things. Those are the kind of things we have encountered here, not the timing of it.

Comment 2: With regards to the steps to promote broad participation to fair housing planning at the local level; is every county government required to do that or only those that are participating in federal housing programs like CDBG or is every county doing that?

Rob Gaudin: For the State of North Carolina it is these, they are protected under land use law according to the state. If the senate budget isn't enacted, proposed budget isn't enacted that capacity might go away and what we would be left with is only those jurisdictions who participate in these sponsored programs. They would be required to take some action within the program itself. Maybe you can...

Comment 3: You answered it probably as best as I can. Generally, for us as far as Commerce is concerned we fund the CDBG programs so certainly those counties and those jurisdictions that receive our funding they are required to have a fair housing plan and some of the other compliance plans in place, but beyond anything else I am not sure if there is any major requirement unless they are receiving other federal funds like HOME funds or from the other agencies, because they have the same requirement, because all four programs are required to have those things in place.

Comment 4: So the condition right now is if a county is not participating in receiving any of those federal funds they don't necessarily have a local fair housing plan.

Comment 5: I don't know if the other federal programs, each county does receive some funds for services and a lot of those are federal funds.

Comment 6: So that may cover it as well.

Rob Gaudin: The other agencies probably do not have a monitoring goal to overlook fair housing. If they are another service or some sort. So, consequently the practical matter is if you participate in one of the four programs funneled through the state or are an entitlement jurisdiction then eventually you will be monitored by FHEO, Fair Housing Equal Opportunity and they will be looking for these kinds of things.

Hickory Fair Housing Forum

Comment 1: If have to do that when?

Rob Gaudin: The next time you do a Five-year Consolidated Plan, so five years from now roughly.

(Presentation)

Comment 2: The implications of it going back to HUD and losing.

Rob Gaudin: Please tell us.

Comment 3: I was just concerned that the Fair Housing Enforcement would tell you to go away, because if the funding goes away and HUD is responsible for it not going to happen unless they put it back in the hands of the folks that are applying for grants and things are ensuring that there is fair housing. I am not sure about that without funding.

Rob Gaudin: HUD will take care of it as HUD takes care of many other things.

Comment 4: That is my issue.

Rob Gaudin: So the reliability of HUD handling local issues makes it very difficult for people to get a hold of them, file a complaint because that goes to Washington or it might go to the Regional Office, but it certainly wouldn't be the state office. It wouldn't even be the local. It would be nothing. So it is much more challenging.

(Presentation)

Comment 5: Is that owned or rental or is that both?

Rob Gaudin: Well let's see what that is. Here we have of the total vacant housing this is those which are for rent it went up a lot and those which are for sale so that went up a lot. So there are more available, but other vacant were over 100,000 units in the non-entitled areas of the state. These are vacant units that are not available for rent or for sale. They are not on the market place.

(Presentation)

Comment 6: How old is this data?

Rob Gaudin: This is current data though this year.

(Presentation)

Comment 7: (Inaudible)

Rob Gaudin: How do you all feel about that?

(Presentation)

Comment 8: I had a landlord that called me just to ask me a couple of questions about fair housing law and she said so you mean if somebody comes to rent one of my apartments and they aren't married and they are living together, but my religion is I don't believe you should live together if you are not married, she said does that mean that I am breaking the fair housing law? I said well I think yes from what the law says, but does she have any recourse since this is a religious freedom for her not to rent to somebody that is living together?

Rob Gaudin: It reminds me of what I read about the County Clerk in Kentucky. I think you read that, but I would say if the perspective tenant were to complain, they may not be protected.

Comment 9: (Inaudible) protected class.

Rob Gaudin: Which of these protected classes would that be?

Comment 10: Martial status.

Rob Gaudin: Marital status is that here?

Comment 11: Is that not familial status?

Rob Gaudin: Familial status is children. The presence of children. Some landlords don't want to have kids around so that protects that. If you had marital status, then they would be protected.

Comment 12: This affects the number of landlords you have, because they don't want these kinds of stipulations. They want the freedom to control who is in their properties.

Rob Gaudin: Right, there are limitations in the law. I mean if these were two white individuals, if they were a mixed couple they could say it was based on race or color or something else, but they could potentially make a case on gender because they are not the same gender. Wait we can't have that. It is really interesting.

Comment 13: It depends on the number of units they have too?

Comment 14: She just said she had...

Comment 15: It is my property why should somebody tell me what I can do with my properties. I mean I gave her some information.

Comment 16: I want to continue with what you are saying, a lot too is landlords that you work with they are done. They are just tired of dealing with this. Tired of you know.

Comment 17: I think it is a lot of different issues. The biggest issues I run into is related to disability and income, because they have disability income. We have some landlords in the community that they said you have to make so much money to be able to be even eligible for the unit. Some of those thresholds are higher than disability incomes, so that excludes anybody on disability. So is that a refusal because of income or because of disability? It is income. So it is not protected. So they can discriminate. They can just say we are not going to allow anybody who makes under \$850, because the majority of people on SSI make \$733. So all those people are discriminated against and can't get and even if their rents are probably some of the lowest rents, we have a landlord in town that has the lowest rents in town, but won't take Section 8 ever. Their one bedroom units are \$345, but they don't qualify because their income is not enough and they won't accept Section 8. So what kind of sense does that make? You can live cheap, but not if you are on Disability and they won't take Section 8.

Comment 18: The landlords are worried that they won't be able to pay the rent?

Comment 19: Yes, you have to have so much income to be able and I understand that and appreciate that, but the reality is the majority of people spend more than 30 percent of their income on housing. Particularly people with disabilities. It is amazing the amount of money that people with disabilities live off of without subsidized housing. That is the biggest thing that I see is discrimination of income, which is not a protected class as opposed to disability but it is directly related to their disability because they can't get any more unless they go to work.

Rob Gaudin: So in a way am I hearing you say that we should add protections for source of income?

Comment 20: That would be my preference, because people with disability and SSI income who have never worked. These are people who have been disabled from birth and never have been able to work and are on SSI can't get into affordable housing. They may be able to live independently or have children or families, but on SSI they can't get into housing without subsidy or if they are going to get into housing it is substandard housing and it has gotten better, but we still have a lot of slumlords. People in places that I wouldn't live, because that is the only places they could get into afford.

Comment 21: We are all discriminated in regards to income. Income limits where we can live or what we can afford.

Comment 22: Yes, but we can at least afford something. People on disability, if those were uniform across all landlords, they wouldn't have a place to live and that is not fair housing. That is not fair to people with disabilities at all. I appreciate that I can live on the lake with my salary, but that is more of a choice. I can afford a home for my family. I am living on my choice and it is not denial, but it may not be where I want to.

Comment 23: Some landlords they; and people will rent and then not pay their rent for months and they spend that money. I can see both sides where I guess that is one reason they have limits on income is they want to get their money.

Comment 24: I understand too. This is a business and all of that. I see that this is a business and you have to make money and you can't give housing away for free. I appreciate that, but just the lack of subsidy and the landlords not accepting subsidy and then not renting to people with limited incomes. Quite honestly the HUD guidelines are worse to discriminate than some of the landlords that I run into as far as allowing reasonable accommodations or considering

reasonable accommodations for Section 8 or for Public Housing. A lot of times it is harder to do reasonable accommodations for subsidized HUD funds than Section 8 or Public Housing. That is your average landlord and some of that maybe their lack of knowledge on the landlord's part, but reasonable accommodation is very difficult to get subsidized housing. I think education is huge. We really don't do enough for education for the landlords or tenants or the people that are providing the housing, I'm like...

Comment 25: What about this with familial status that is a hard question. I mean that is confusing. So but you are supposed to be that is like me, people are calling me and I don't know. If we don't know and we are supposed to be the professionals then how is anybody else supposed to know and enforce that? That is very difficult.

Comment 26: I have never seen a definition of familial status. I mean HUD has all kind of definitions and maybe I haven't actually seen that definition of what that is.

Comment 27: The question that I have for everybody is education. How do you get people to actually come if you have workshops that would train you on fair housing and all of the definitions and offer that free if you come to the area and then you have people show up? What engagement would the state have, because that is going to be our challenge to figure out how to engage different communities to participate? So we offer the training and we bring it to you. How do we actually get people to come and then voice their opinions about what things could change? Things will never change if people don't speak up. You have a small group and some of the challenges you have, but you don't have a broad group of folks that are actually saying that this is not working then those things are never going to change. So our challenge is how do you get people to actually participate?

Comment 28: I am having the same challenges in other things that we do. Our Continuum of Care that we do here, it is hard to get people to attend some of the awareness things. What we found was you have to find them and that person. With fair housing and things there are landlord associations that have meetings. You know taking it to the meeting, because I couldn't get them to come to me. So I think taking it to and advertising you can get more out. I know we are very active and we didn't find out about this meeting until Tuesday, last Tuesday when the Balance of State Continuum of Care called and so it made it in the newspaper.

Comment 29: But who reads the newspaper anymore?

Comment 30: I mean and that is my fault. For a lot of people newspapers went away and I am not faulting anybody, but we try to spread the word too. We changed our meeting time to get more people here and that didn't work. So, we truly appreciate how hard it is to get people to attend.

Comment 31: It is I think it is incentives. You know what is in it for that person at the end? You know we go through the same argument with employment, with a lot of around the local area. When you talk to businesses and stuff about hiring your clients they are like what is in it for me? You know I am not getting any type of tax break. You know so it is going to like well if there is a tax break they need to know about it. I think you are having the same issue with the landlords. It is kind of like they are getting all of this headache and nothing in return. You have the stigma about the government about how long it takes you to get paid. (Inaudible)

Comment 32: I think some of the issues are not that we have too in our area are not just related to landlord issues or discrimination issues, but we have people that are getting places to live

and do not know how to maintain places to live. So they ruin their record with the landlord or they leave those utility bills and owing people hundreds of dollars, because they are not having the support to maintain, but that is another issue.

Comment 33: Yes we could go on to generational poverty and all of that.

Rob Gaudin: Thank you for your input. Other commentary questions or concerns?

Comment 34: You made the comment earlier about how we can't point the finger at mortgage lenders and things like that. I guess part of me wants to know why we can't. Especially when it comes to in my opinion, it should be one plus one equals two kind of thing and not something that is based on your color.

Rob Gaudin: The Federal Reserve and you see this HAL here and I think you can with this. When you drill down this data you will see that the type of housing unit that these guys are buying is different than these guys. These guys are buying manufacture housing and there are three lenders that do that nationally and they are and some of these lenders that is all they do these predatory loans on that type of property. It is easy to get in and a high interest rate. They hide it in the fine print and these guys are not there. I think that is what is going on. It is really prevalent in the rural areas where that occurs and that is a lender issue.

Comment 35: I have a question about and I think it is one slide back from that one. It was one that was like there is a lot of missing data. I think it is on income maybe. So how do you truly determine the average if there is so much data missing? That is a large percentage of data that is missing.

Rob Gaudin: This is just the percentage of this group and it is not of the data that is missing. It could be ten or 40 percent is American Indian and this is kind of like this.

Comment 36: So that is not the percentage of information that is missing it is...OK.

Rob Gaudin: I include these not applicable and not available and data missing, so that we are looking at the full dataset. So that in reality the table in the back of the document that has the numbers that also supports the percentages.

Comment 37: I guess that was my, the not available, the not applicable, and the data missing even that even valid data.

Rob Gaudin: Well, if it is not available it is not valid. Well, within this category here black verses white that is 23 percent of black households who got this denial rate. That is how many were denied in that income category. In the data that were missing this we were able to indicate what is missing is their income, we do know their rates. This is from the LAR, Loan Account Record and there are some are data elements to it, because it was entered by a human. Somebody typed it in so there are human errors. The errors equal out with the bad errors statically.

D. ADDITIONAL HMDA TABLES

I. HMDA DATA: NON-ENTITLEMENT AREAS OF NORTH CAROLINA

Table D.I.1
Owner-Occupied Home Purchase Loan Applications by Loan Type
 Non-Entitlement Areas of North Carolina
 2004–2013 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Conventional	126,431	151,401	152,381	122,002	54,595	34,690	34,702	37,877	43,445	54,941	812,465
FHA - Insured	14,646	14,359	12,701	12,399	24,467	21,752	21,576	17,802	16,315	16,517	172,534
VA - Guaranteed	8,397	8,753	9,247	8,963	11,298	12,569	13,324	12,211	12,275	14,176	111,213
Rural Housing Service or Farm Service Agency	987	888	938	1,468	4,914	12,191	9,480	10,926	12,614	13,685	68,091
Total	150,461	175,401	175,267	144,832	95,274	81,202	79,082	78,816	84,649	99,319	1,164,303

DENIAL RATES

Table D.I.2
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant
 Non-Entitlement Areas of North Carolina
 2004–2013 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
American Indian	Originated	512	549	571	460	288	262	284	230	263	363	3,782
	Denied	538	475	409	263	180	136	276	295	453	493	3,518
	Denial Rate	51.2%	46.4%	41.7%	36.4%	38.5%	49.3%	49.3%	56.2%	63.3%	57.6%	48.2%
Asian	Originated	1,046	1,238	1,370	1,224	802	678	545	583	575	757	8,818
	Denied	376	377	356	369	217	149	178	152	178	193	2,545
	Denial Rate	26.4%	23.3%	20.6%	23.2%	21.3%	18.0%	24.6%	20.7%	23.6%	20.3%	22.4%
Black	Originated	6,646	8,458	8,365	6,729	4,460	3,493	3,415	2,978	2,671	3,165	50,380
	Denied	4,558	4,641	4,998	4,035	1,851	1,361	2,006	2,693	3,936	3,707	33,786
	Denial Rate	40.7%	35.4%	37.4%	37.5%	29.3%	28.0%	37.0%	47.5%	59.6%	53.9%	40.1%
White	Originated	59,297	71,308	70,928	59,056	40,569	33,437	30,651	28,587	30,910	37,707	462,450
	Denied	14,873	15,523	15,268	12,858	7,662	6,308	7,443	7,758	10,006	10,772	108,471
	Denial Rate	20.1%	17.9%	17.7%	17.9%	15.9%	15.9%	19.5%	21.3%	24.5%	22.2%	19.0%
Not Available	Originated	6,182	6,964	7,633	6,384	3,656	2,825	2,586	2,418	2,060	2,616	43,324
	Denied	2,710	2,891	2,978	2,331	1,380	974	1,392	1,530	1,465	1,710	19,361
	Denial Rate	30.5%	29.3%	28.1%	26.7%	27.4%	25.6%	35.0%	38.8%	41.6%	39.5%	30.9%
Not Applicable	Originated	227	23	26	16	14	17	7	6	8	11	355
	Denied	76	4	3	1	7	1	2	11	1	1	107
	Denial Rate	30.5%	29.3%	28.1%	26.7%	27.4%	25.6%	35.0%	38.8%	41.6%	39.5%	23.2%
Total	Originated	73,910	88,540	88,893	73,869	49,789	40,712	37,488	34,802	36,487	44,619	569,109
	Denied	23,131	23,911	24,012	19,857	11,297	8,929	11,297	12,439	16,039	16,876	167,788
	Denial Rate	23.8%	21.3%	21.3%	21.2%	18.5%	18.0%	23.2%	26.3%	30.5%	27.4%	22.8%
Non-Hispanic	Originated	57,757	77,747	77,970	64,742	44,475	36,509	33,435	30,818	32,803	39,825	496,081
	Denied	17,839	19,160	19,654	16,463	9,270	7,513	8,490	8,479	10,687	11,236	128,791
	Denial Rate	23.6%	19.8%	20.1%	20.3%	17.2%	17.1%	20.3%	21.6%	24.6%	22.0%	20.6%
Hispanic	Originated	2,847	3,484	3,922	3,091	1,884	1,424	1,377	1,248	1,256	1,605	22,138
	Denied	1,564	1,590	1,365	1,128	637	451	563	593	709	813	9,413
	Denial Rate	35.5%	31.3%	25.8%	26.7%	25.3%	24.1%	29.0%	32.2%	36.1%	33.6%	29.8%

Table D.I.3
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant
 Non-Entitlement Areas of North Carolina
 2004–2013 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	382	448	3,729	14,318	2,097	10	20,984	1,155
Employment History	31	74	289	1,842	256	3	2,495	215
Credit History	1,320	643	11,755	32,697	5,195	8	51,618	2,708
Collateral	115	203	1,156	9,199	1,281	15	11,969	639
Insufficient Cash	60	101	586	2,819	356	3	3,925	253
Unverifiable Information	33	112	618	2,609	502	17	3,891	362
Credit Application Incomplete	74	115	728	4,432	1,001	11	6,361	310
Mortgage Insurance Denied	2	4	24	103	27	0	160	5
Other	269	314	2,968	10,995	1,809	20	16,375	1,101
Missing	1,232	531	11,933	29,457	6,837	20	50,010	2,665
Total	3,518	2,545	33,786	108,471	19,361	107	167,788	9,413
% Missing	35.0%	20.9%	35.3%	27.2%	35.3%	18.7%	29.8%	28.3%

Table D.I.4
Loan Applications by Selected Action Taken by Gender of Applicant
 Non-Entitlement Areas of North Carolina
 2004–2013 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Male	Originated	51,275	60,483	60,311	50,064	34,112	27,708	25,481	23,826	25,326	30,574	389,160
	Denied	13,876	13,971	13,875	11,729	6,758	5,331	6,291	6,686	8,763	9,375	96,655
	Denial Rate	21.3%	18.8%	18.7%	19.0%	16.5%	16.1%	19.8%	21.9%	25.7%	23.5%	19.9%
Female	Originated	20,482	25,318	25,349	20,649	13,801	11,505	10,569	9,685	10,129	12,656	160,143
	Denied	8,154	8,691	8,701	6,871	3,773	2,990	4,045	4,748	6,437	6,404	60,814
	Denial Rate	28.5%	25.6%	25.6%	25.0%	21.5%	20.6%	27.7%	32.9%	38.9%	33.6%	27.5%
Not Available	Originated	2,115	2,714	3,212	3,127	1,857	1,483	1,431	1,283	1,023	1,378	19,623
	Denied	1,096	1,246	1,434	1,252	756	606	959	1,000	837	1,096	10,282
	Denial Rate	34.1%	31.5%	30.9%	28.6%	28.9%	29.0%	40.1%	43.8%	45.0%	44.3%	34.4%
Not Applicable	Originated	38	25	21	29	19	16	7	8	9	11	183
	Denied	5	3	2	5	10	2	2	5	2	1	37
	Denial Rate	11.6%	10.7%	8.7%	14.7%	34.5%	11.1%	22.2%	38.5%	18.2%	8.3%	16.8%
Total	Originated	73,910	88,540	88,893	73,869	49,789	40,712	37,488	34,802	36,487	44,619	569,109
	Denied	23,131	23,911	24,012	19,857	11,297	8,929	11,297	12,439	16,039	16,876	167,788
	Denial Rate	23.8%	21.3%	21.3%	21.2%	18.5%	18.0%	23.2%	26.3%	30.5%	27.4%	22.8%

Table D.I.5
Loan Applications by Income of Applicant: Originated and Denied
 Non-Entitlement Areas of North Carolina
 2004–2013 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
\$15,000 or Below	Loan Originated	581	435	491	389	223	193	192	184	173	141	3,002
	Application Denied	1,158	1,209	894	842	358	344	554	710	899	878	7,846
	Denial Rate	66.6%	73.5%	64.5%	68.4%	61.6%	64.1%	74.3%	79.4%	83.9%	86.2%	72.3%
\$15,001 –\$30,000	Loan Originated	10,474	10,337	8,354	6,916	4,494	4,421	4,435	4,020	3,984	4,151	61,586
	Application Denied	7,993	7,421	6,393	5,162	2,396	2,029	3,307	3,767	5,022	4,788	48,278
	Denial Rate	43.3%	41.8%	43.4%	42.7%	34.8%	31.5%	42.7%	48.4%	55.8%	53.6%	43.9%
\$30,001 –\$45,000	Loan Originated	17,663	19,495	17,832	15,533	10,994	10,270	8,980	7,993	8,074	9,507	126,341
	Application Denied	6,189	6,185	5,980	4,935	2,935	2,351	2,832	3,239	4,186	4,391	43,223
	Denial Rate	25.9%	24.1%	25.1%	24.1%	21.1%	18.6%	24.0%	28.8%	34.1%	31.6%	25.5%
\$45,001 –\$60,000	Loan Originated	14,831	17,968	17,427	13,553	9,914	8,397	7,522	6,822	6,839	8,230	111,503
	Application Denied	3,509	3,799	4,089	3,190	1,946	1,450	1,662	1,964	2,475	2,717	26,801
	Denial Rate	19.1%	17.5%	19.0%	19.1%	16.4%	14.7%	18.1%	22.4%	26.6%	24.8%	19.4%
\$60,001 –\$75,000	Loan Originated	9,719	12,044	12,100	10,157	7,299	5,804	5,062	4,660	5,033	6,339	78,217
	Application Denied	1,508	1,786	2,174	1,790	1,139	853	942	944	1,246	1,489	13,871
	Denial Rate	13.4%	12.9%	15.2%	15.0%	13.5%	12.8%	15.7%	16.8%	19.8%	19.0%	15.1%
Above \$75,000	Loan Originated	18,359	24,584	28,354	25,382	16,413	11,305	10,891	10,662	11,951	15,734	173,635
	Application Denied	2,127	2,893	3,681	3,429	2,138	1,495	1,575	1,556	1,903	2,350	23,147
	Denial Rate	10.4%	10.5%	11.5%	11.9%	11.5%	11.7%	12.6%	12.7%	13.7%	13.0%	11.8%
Data Missing	Loan Originated	2,283	3,677	4,335	1,939	452	322	406	461	433	517	14,825
	Application Denied	647	618	801	509	385	407	425	259	308	263	4,622
	Denial Rate	22.1%	14.4%	15.6%	20.8%	46.0%	55.8%	51.1%	36.0%	41.6%	33.7%	23.8%
Total	Loan Originated	73,910	88,540	88,893	73,869	49,789	40,712	37,488	34,802	36,487	44,619	569,109
	Application Denied	23,131	23,911	24,012	19,857	11,297	8,929	11,297	12,439	16,039	16,876	167,788
	Denial Rate	23.8%	21.3%	21.3%	21.2%	18.5%	18.0%	23.2%	26.3%	30.5%	27.4%	22.8%

Table D.I.6
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 Non-Entitlement Areas of North Carolina
 2004–2013 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	47	768	1,016	730	428	739	54	3,782
	Application Denied	240	1,365	923	429	245	274	42	3,518
	Denial Rate	83.6%	64.0%	47.6%	37.0%	36.4%	27.0%	43.8%	48.2%
Asian	Loan Originated	51	931	1,615	1,675	1,148	3,112	286	8,818
	Application Denied	102	662	609	412	184	488	88	2,545
	Denial Rate	66.7%	41.6%	27.4%	19.7%	13.8%	13.6%	23.5%	22.4%
Black	Loan Originated	318	7,612	14,031	11,211	6,457	9,927	824	50,380
	Application Denied	2,016	11,914	9,076	4,919	2,269	3,036	556	33,786
	Denial Rate	86.4%	61.0%	39.3%	30.5%	26.0%	23.4%	40.3%	40.1%
White	Loan Originated	2,328	48,398	101,003	89,617	64,276	144,999	11,829	462,450
	Application Denied	4,740	29,477	27,971	17,962	9,565	16,287	2,469	108,471
	Denial Rate	67.1%	37.9%	21.7%	16.7%	13.0%	10.1%	17.3%	19.0%
Not Available	Loan Originated	255	3,818	8,609	8,225	5,892	14,821	1,704	43,324
	Application Denied	748	4,835	4,608	3,069	1,603	3,059	1,439	19,361
	Denial Rate	74.6%	55.9%	34.9%	27.2%	21.4%	17.1%	45.8%	30.9%
Not Applicable	Loan Originated	3	59	67	45	16	37	128	355
	Application Denied	0	25	36	10	5	3	28	107
	Denial Rate	.0%	29.8%	35.0%	18.2%	23.8%	7.5%	17.9%	23.2%
Total	Loan Originated	3,002	61,586	126,341	111,503	78,217	173,635	14,825	569,109
	Application Denied	7,846	48,278	43,223	26,801	13,871	23,147	4,622	167,788
	Denial Rate	72.3%	43.9%	25.5%	19.4%	15.1%	11.8%	23.8%	22.8%
Non-Hispanic	Loan Originated	2,498	51,903	109,651	97,388	69,078	153,355	12,208	496,081
	Application Denied	5,785	36,075	33,177	20,996	11,126	18,801	2,831	128,791
	Denial Rate	69.8%	41.0%	23.2%	17.7%	13.9%	10.9%	18.8%	20.6%
Hispanic	Loan Originated	158	4,660	6,432	4,337	2,286	3,587	678	22,138
	Application Denied	407	3,469	2,719	1,283	550	753	232	9,413
	Denial Rate	72.0%	42.7%	29.7%	22.8%	19.4%	17.4%	25.5%	29.8%

PREDATORY LENDING

Table D.I.7
Loans by Loan Purpose by HAL Status
 Non-Entitlement Areas of North Carolina
 2004–2013 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Home Purchase	Other	63,103	68,553	70,236	64,707	46,157	38,893	36,537	33,621	35,064	43,111	499,982
	HAL	10,807	19,987	18,657	9,162	3,632	1,819	951	1,181	1,423	1,508	69,127
	Percent HAL	14.6%	22.6%	21.0%	12.4%	7.3%	4.5%	2.5%	3.4%	3.9%	3.4%	12.1%
Home Improvement	Other	5,981	7,110	7,770	7,608	4,971	3,691	3,829	3,920	4,732	6,107	55,719
	HAL	2,595	3,851	3,927	3,244	1,885	736	279	216	163	121	17,017
	Percent HAL	30.3%	35.1%	33.6%	29.9%	27.5%	16.6%	6.8%	5.2%	3.3%	1.9%	23.4%
Refinancing	Other	65,772	60,018	54,425	54,933	58,621	97,764	76,985	69,374	87,030	73,345	698,267
	HAL	17,970	22,803	23,503	17,138	10,182	4,332	405	455	511	356	97,655
	Percent HAL	21.5%	27.5%	30.2%	23.8%	14.8%	4.2%	.5%	.7%	.6%	.5%	12.3%
Total	Other	134,856	135,681	132,431	127,248	109,749	140,348	117,351	106,915	126,826	122,563	1,253,968
	HAL	31,372	46,641	46,087	29,544	15,699	6,887	1,635	1,852	2,097	1,985	183,799
	Percent HAL	18.9%	25.6%	25.8%	18.8%	12.5%	4.7%	1.4%	1.7%	1.6%	1.6%	12.8%

Table D.I.8
HALs Originated by Race of Borrower
 Non-Entitlement Areas of North Carolina
 2004–2013 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
American Indian	147	188	158	114	59	45	40	34	55	80	920
Asian	127	234	218	113	41	23	5	5	4	9	779
Black	1,999	3,702	3,281	1,422	454	187	166	258	302	282	12,053
White	7,427	13,556	12,677	6,569	2,836	1,495	670	781	961	1,010	47,982
Not Available	1,079	2,307	2,323	943	242	68	70	103	101	127	7,363
Not Applicable	28	0	0	1	0	1	0	0	0	0	30
Total	10,807	19,987	18,657	9,162	3,632	1,819	951	1,181	1,423	1,508	69,127
Non-Hispanic	8,589	16,503	15,323	7,614	3,132	1,621	638	621	781	772	55,594
Hispanic	617	1,110	1,305	650	259	125	64	53	114	85	4,382

Table D.I.9
Loans by HAL Status by Race/Ethnicity of Borrower
 Non-Entitlement Areas of North Carolina
 2004–2013 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
American Indian	Other	365	361	413	346	229	217	244	196	208	283	2,862
	HAL	147	188	158	114	59	45	40	34	55	80	920
	Percent HAL	28.7%	34.2%	27.7%	24.8%	20.5%	17.2%	14.1%	14.8%	20.9%	22.0%	24.3%
Asian	Other	919	1,004	1,152	1,111	761	655	540	578	571	748	8,039
	HAL	127	234	218	113	41	23	5	5	4	9	779
	Percent HAL	12.1%	18.9%	15.9%	9.2%	5.1%	3.4%	.9%	.9%	.7%	1.2%	8.8%
Black	Other	4,647	4,756	5,084	5,307	4,006	3,306	3,249	2,720	2,369	2,883	38,327
	HAL	1,999	3,702	3,281	1,422	454	187	166	258	302	282	12,053
	Percent HAL	30.1%	43.8%	39.2%	21.1%	10.2%	5.4%	4.9%	8.7%	11.3%	8.9%	23.9%
White	Other	51,870	57,752	58,251	52,487	37,733	31,942	29,981	27,806	29,949	36,697	414,468
	HAL	7,427	13,556	12,677	6,569	2,836	1,495	670	781	961	1,010	47,982
	Percent HAL	12.5%	19.0%	17.9%	11.1%	7.0%	4.5%	2.2%	2.7%	3.1%	2.7%	10.4%
Not Available	Other	5,103	4,657	5,310	5,441	3,414	2,757	2,516	2,315	1,959	2,489	35,961
	HAL	1,079	2,307	2,323	943	242	68	70	103	101	127	7,363
	Percent HAL	17.5%	33.1%	30.4%	14.8%	6.6%	2.4%	2.7%	4.3%	4.9%	4.9%	17.0%
Not Applicable	Other	199	23	26	15	14	16	7	6	8	11	325
	HAL	28	0	0	1	0	1	0	0	0	0	30
	Percent HAL	12.3%	.0%	.0%	6.3%	.0%	5.9%	.0%	.0%	.0%	.0%	8.5%
Total	Other	63,103	68,553	70,236	64,707	46,157	38,893	36,537	33,621	35,064	43,111	499,982
	HAL	10,807	19,987	18,657	9,162	3,632	1,819	951	1,181	1,423	1,508	69,127
	Percent HAL	14.6%	22.6%	21.0%	12.4%	7.3%	4.5%	2.5%	3.4%	3.9%	3.4%	12.1%
Non-Hispanic	Other	49,168	61,244	62,647	57,128	41,343	34,888	32,797	30,197	32,022	39,053	440,487
	HAL	8,589	16,503	15,323	7,614	3,132	1,621	638	621	781	772	55,594
	Percent HAL	14.9%	21.2%	19.7%	11.8%	7.0%	4.4%	1.9%	2.0%	2.4%	1.9%	11.2%
Hispanic	Other	2,230	2,374	2,617	2,441	1,625	1,299	1,313	1,195	1,142	1,520	17,756
	HAL	617	1,110	1,305	650	259	125	64	53	114	85	4,382
	Percent HAL	21.7%	31.9%	33.3%	21.0%	13.7%	8.8%	4.6%	4.2%	9.1%	5.3%	19.8%

Table D.I.10
Rates of HALs by Income of Borrower
 Non-Entitlement Areas of North Carolina
 2004–2013 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Average
\$15,000 or Below	31.0%	32.2%	20.0%	28.0%	22.0%	15.0%	8.9%	18.5%	22.0%	13.5%	23.8%
\$15,001–\$30,000	22.4%	31.7%	26.7%	20.6%	14.6%	7.7%	6.8%	9.5%	11.8%	10.0%	19.2%
\$30,001–\$45,000	17.6%	28.0%	23.5%	13.5%	8.3%	4.5%	3.3%	4.3%	5.8%	5.5%	14.1%
\$45,001 –\$60,000	15.1%	25.0%	22.9%	12.7%	6.7%	3.9%	2.3%	3.4%	3.5%	3.2%	12.9%
\$60,001–\$75,000	12.2%	20.4%	20.5%	10.9%	5.4%	3.4%	1.4%	2.1%	2.0%	2.3%	10.5%
Above \$75,000	8.2%	13.5%	15.0%	8.8%	5.6%	3.9%	.8%	.9%	.9%	.8%	7.5%
Data Missing	10.9%	22.4%	32.7%	24.4%	5.5%	6.2%	.2%	.0%	.0%	2.3%	20.4%
Average	14.6%	22.6%	21.0%	12.4%	7.3%	4.5%	2.5%	3.4%	3.9%	3.4%	12.1%

Table D.I.11
Loans by HAL Status by Income of Borrower
 Non-Entitlement Areas of North Carolina
 2004–2013 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
\$15,000 or Below	Other	401	295	393	280	174	164	175	150	135	122	2,289
	HAL	180	140	98	109	49	29	17	34	38	19	713
	Percent HAL	31.0%	32.2%	20.0%	28.0%	22.0%	15.0%	8.9%	18.5%	22.0%	13.5%	23.8%
\$15,001 –\$30,000	Other	8,125	7,060	6,127	5,492	3,836	4,079	4,132	3,638	3,513	3,734	49,736
	HAL	2,349	3,277	2,227	1,424	658	342	303	382	471	417	11,850
	Percent HAL	22.4%	31.7%	26.7%	20.6%	14.6%	7.7%	6.8%	9.5%	11.8%	10.0%	19.2%
\$30,001 –\$45,000	Other	14,552	14,032	13,649	13,430	10,080	9,808	8,681	7,649	7,605	8,980	108,466
	HAL	3,111	5,463	4,183	2,103	914	462	299	344	469	527	17,875
	Percent HAL	17.6%	28.0%	23.5%	13.5%	8.3%	4.5%	3.3%	4.3%	5.8%	5.5%	14.1%
\$45,001 –\$60,000	Other	12,594	13,476	13,434	11,833	9,250	8,069	7,351	6,593	6,599	7,965	97,164
	HAL	2,237	4,492	3,993	1,720	664	328	171	229	240	265	14,339
	Percent HAL	15.1%	25.0%	22.9%	12.7%	6.7%	3.9%	2.3%	3.4%	3.5%	3.2%	12.9%
\$60,001 –\$75,000	Other	8,536	9,585	9,624	9,046	6,902	5,606	4,989	4,562	4,931	6,195	69,976
	HAL	1,183	2,459	2,476	1,111	397	198	73	98	102	144	8,241
	Percent HAL	12.2%	20.4%	20.5%	10.9%	5.4%	3.4%	01.4%	2.1%	2.0%	2.3%	10.5%
Above \$75,000	Other	16,860	21,253	24,090	23,161	15,488	10,865	10,804	10,568	11,848	15,610	160,547
	HAL	1,499	3,331	4,264	2,221	925	440	87	94	103	124	13,088
	Percent HAL	8.2%	13.5%	15.0%	8.8%	5.6%	3.9%	.8%	.9%	.9%	.8%	7.5%
Data Missing	Other	2,035	2,852	2,919	1,465	427	302	405	461	433	505	11,804
	HAL	248	825	1,416	474	25	20	1	0	0	12	3,021
	Percent HAL	10.9%	22.4%	32.7%	24.4%	5.5%	6.2%	.2%	.0%	.0%	2.3%	20.4%
Total	Other	63,103	68,553	70,236	64,707	46,157	38,893	36,537	33,621	35,064	43,111	499,982
	HAL	10,807	19,987	18,657	9,162	3,632	1,819	951	1,181	1,423	1,508	69,127
	Percent HAL	14.6%	22.6%	21.0%	12.4%	7.3%	4.5%	2.5%	3.4%	3.9%	3.4%	12.1%

II. HMDA DATA: ENTITLEMENT AREAS OF NORTH CAROLINA

Table D.II.1
Purpose of Loan by Year
 Entitlement Areas of North Carolina
 2004–2013 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Home Purchase	154,987	194,363	218,465	172,104	101,773	80,339	72,082	68,165	80,356	97,667	1,240,301
Home Improvement	15,165	18,352	18,705	19,993	14,655	6,922	5,417	5,913	8,898	9,521	123,541
Refinancing	175,457	174,870	158,225	151,642	130,472	187,047	149,157	133,373	180,251	152,396	1,592,890
Total	345,609	387,585	395,395	343,739	246,900	274,308	226,656	207,451	269,505	259,584	2,956,732

Table D.II.2
Occupancy Status for Home Purchase Loan Applications
 Entitlement Areas of North Carolina
 2004–2013 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Owner-Occupied	134,728	164,502	178,371	142,574	87,932	74,194	65,999	61,896	73,093	88,843	1,072,132
Not Owner-Occupied	19,501	28,762	39,278	28,875	13,436	5,986	6,000	6,154	7,121	8,613	163,726
Not Applicable	758	1,099	816	655	405	159	83	115	142	211	4,443
Total	154,987	194,363	218,465	172,104	101,773	80,339	72,082	68,165	80,356	97,667	1,240,301

Table D.II.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
 Entitlement Areas of North Carolina
 2004–2013 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Conventional	111,795	144,918	160,529	125,932	55,561	36,540	31,963	32,649	42,213	56,522	798,622
FHA - Insured	15,724	12,320	10,139	9,723	23,817	27,547	24,718	19,734	20,890	20,751	185,363
VA - Guaranteed	7,069	7,140	7,593	6,703	7,808	7,905	7,658	7,502	7,567	8,843	75,788
Rural Housing Service or Farm Service Agency	140	124	110	216	746	2,202	1,660	2,011	2,423	2,727	12,359
Total	134,728	164,502	178,371	142,574	87,932	74,194	65,999	61,896	73,093	88,843	1,072,132

DENIAL RATES

Table D.II.4
Loan Applications by Action Taken
 Entitlement Areas of North Carolina
 2004–2013 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Loan Originated	75,136	89,911	93,619	74,127	47,077	37,769	33,495	30,234	36,549	45,080	562,997
Application Approved but not Accepted	6,150	8,068	9,800	7,540	3,856	1,848	1,937	2,458	2,587	3,553	47,797
Application Denied	11,997	13,947	15,704	12,537	7,503	5,467	5,694	5,817	7,364	7,876	93,906
Application Withdrawn by Applicant	8,603	10,682	10,292	8,594	6,307	4,904	4,552	4,221	5,097	6,971	70,223
File Closed for Incompleteness	1,777	2,229	2,167	1,940	1,186	948	845	961	970	1,223	14,246
Loan Purchased by the Institution	31,065	39,550	46,770	37,793	21,987	23,120	19,475	18,202	20,524	24,132	282,618
Preapproval Request Denied	0	114	16	43	16	138	1	3	1	5	337
Preapproval Approved but not Accepted	0	1	3	0	0	0	0	0	1	3	8
Total	134,728	164,502	178,371	142,574	87,932	74,194	65,999	61,896	73,093	88,843	1,072,132
Denial Rate	13.8%	13.4%	14.4%	14.5%	13.7%	12.6%	14.5%	16.1%	16.8%	14.9%	14.3%

Table D.II.5
Loan Applications by Reason for Denial

Entitlement Areas of North Carolina
2004–2013 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Debt-to-Income Ratio	1,595	1,876	2,041	2,098	1,506	1,158	1,128	1,129	1,232	1,454	15,217
Employment History	226	285	373	345	216	181	173	156	184	190	2,329
Credit History	3,629	3,751	3,856	3,005	1,654	1,228	1,258	1,237	1,476	1,473	22,567
Collateral	618	886	1,191	986	757	723	701	593	651	869	7,975
Insufficient Cash	329	388	409	442	327	158	186	150	189	259	2,837
Unverifiable Information	479	609	795	758	416	246	252	244	283	262	4,344
Credit Application Incomplete	762	909	990	1,131	521	215	269	223	537	678	6,235
Mortgage Insurance Denied	11	6	4	24	33	21	14	14	12	8	147
Other	1,696	2,382	2,305	1,532	766	527	462	443	586	365	11,064
Missing	2,652	2,855	3,740	2,216	1,307	1,010	1,251	1,628	2,214	2,318	21,191
Total	11,997	13,947	15,704	12,537	7,503	5,467	5,694	5,817	7,364	7,876	93,906

Table D.II.6
Denial Rates by Race/Ethnicity of Applicant

Entitlement Areas of North Carolina
2004–2013 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Average
American Indian	25.5%	22.1%	20.8%	25.0%	26.5%	18.3%	23.4%	26.5%	37.7%	25.3%	24.4%
Asian	12.4%	11.7%	10.4%	13.9%	15.6%	13.6%	12.6%	14.3%	13.2%	14.6%	13.0%
Black	24.0%	22.0%	25.8%	26.7%	23.4%	20.7%	24.5%	30.4%	32.2%	28.7%	25.2%
White	9.8%	9.9%	10.1%	10.4%	10.5%	10.0%	11.2%	11.8%	12.6%	11.2%	10.5%
Not Available	21.0%	19.3%	20.5%	19.1%	18.3%	17.6%	21.9%	25.2%	25.9%	23.4%	20.6%
Not Applicable	17.2%	22.2%	18.2%	10.0%	.0%	05.6%	016.7%	.0%	28.6%	12.5%	15.8%
Average	13.8%	13.4%	14.4%	14.5%	13.7%	12.6%	14.5%	16.1%	16.8%	14.9%	14.3%
Non-Hispanic	12.6%	12.1%	13.1%	13.3%	12.8%	11.7%	12.9%	13.6%	14.2%	12.9%	12.9%
Hispanic	22.4%	20.7%	19.8%	21.5%	20.7%	19.2%	21.3%	20.9%	23.7%	21.4%	21.0%

Table D.II.7
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant

Entitlement Areas of North Carolina
 2004–2013 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
American Indian	Originated	351	445	430	297	169	152	151	114	132	168	2,409
	Denied	120	126	113	99	61	34	46	41	80	57	777
	Denial Rate	25.5%	22.1%	20.8%	25.0%	26.5%	23.4%	23.4%	26.5%	37.7%	25.3%	24.4%
Asian	Originated	2,797	3,523	3,729	3,284	2,113	1,748	1,593	1,527	2,022	2,548	24,884
	Denied	396	465	435	530	390	276	229	255	308	434	3,718
	Denial Rate	12.4%	11.7%	10.4%	13.9%	15.6%	13.6%	12.6%	14.3%	13.2%	14.6%	13.0%
Black	Originated	11,729	16,068	15,225	10,857	6,617	5,459	4,856	3,895	4,424	5,186	84,316
	Denied	3,698	4,538	5,288	3,953	2,017	1,428	1,577	1,699	2,103	2,092	28,393
	Denial Rate	24.0%	22.0%	25.8%	26.7%	23.4%	20.7%	24.5%	30.4%	32.2%	28.7%	25.2%
White	Originated	52,231	60,964	63,934	51,101	33,098	26,941	24,004	22,103	27,303	33,887	395,566
	Denied	5,663	6,691	7,207	5,928	3,899	2,990	3,033	2,948	3,938	4,288	46,585
	Denial Rate	9.8%	9.9%	10.1%	10.4%	10.5%	10.0%	11.2%	11.8%	12.6%	11.2%	10.5%
Not Available	Originated	7,759	8,904	10,265	8,570	5,063	3,452	2,886	2,588	2,663	3,284	55,434
	Denied	2,064	2,125	2,653	2,025	1,136	738	808	874	933	1,004	14,360
	Denial Rate	21.0%	19.3%	20.5%	19.1%	18.3%	17.6%	21.9%	25.2%	25.9%	23.4%	20.6%
Not Applicable	Originated	269	7	36	18	17	17	5	7	5	7	388
	Denied	56	2	8	2	0	1	1	0	2	1	73
	Denial Rate	21.0%	19.3%	20.5%	19.1%	18.3%	17.6%	21.9%	25.2%	25.9%	23.4%	15.8%
Total	Originated	75,136	89,911	93,619	74,127	47,077	37,769	33,495	30,234	36,549	45,080	562,997
	Denied	11,997	13,947	15,704	12,537	7,503	5,467	5,694	5,817	7,364	7,876	93,906
	Denial Rate	13.8%	13.4%	14.4%	14.5%	13.7%	12.6%	14.5%	16.1%	16.8%	14.9%	14.3%
Non-Hispanic	Originated	57,759	75,793	78,204	61,685	39,815	32,626	28,955	26,260	32,181	39,555	472,833
	Denied	8,343	10,461	11,831	9,446	5,824	4,315	4,286	4,148	5,324	5,864	69,842
	Denial Rate	12.6%	12.1%	13.1%	13.3%	12.8%	11.7%	12.9%	13.6%	14.2%	12.9%	12.9%
Hispanic	Originated	3,766	5,103	6,155	4,563	2,503	1,779	1,713	1,464	1,756	2,212	31,014
	Denied	1,089	1,331	1,519	1,253	652	424	465	387	546	601	8,267
	Denial Rate	22.4%	20.7%	19.8%	21.5%	20.7%	19.2%	21.3%	20.9%	23.7%	21.4%	21.0%

Table D.II.8
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant

Entitlement Areas of North Carolina
 2004–2013 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	103	739	4,489	7,833	2,044	9	15,217	1,341
Employment History	24	164	461	1,361	318	1	2,329	275
Credit History	235	637	8,284	10,280	3,122	9	22,567	1,770
Collateral	55	301	1,523	5,093	994	9	7,975	741
Insufficient Cash	20	179	625	1,631	378	4	2,837	238
Unverifiable Information	25	325	1,062	2,264	655	13	4,344	617
Credit Application Incomplete	36	318	1,303	3,417	1,153	8	6,235	480
Mortgage Insurance Denied	2	2	43	82	18	0	147	14
Other	83	449	3,181	5,531	1,811	9	11,064	976
Missing	194	604	7,422	9,093	3,867	11	21,191	1,815
Total	777	3,718	28,393	46,585	14,360	73	93,906	8,267
% Missing	25.0%	16.2%	26.1%	19.5%	26.9%	15.1%	22.6%	22.0%

Table D.II.9
Denial Rates by Gender of Applicant
 Entitlement Areas of North Carolina
 2004–2013 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	12.3%	15.3%	23.5%	25.0%	13.8%
2005	12.2%	14.6%	20.6%	20.0%	13.4%
2006	12.9%	15.7%	22.1%	28.0%	14.4%
2007	13.4%	15.7%	18.4%	22.2%	14.5%
2008	12.6%	15.3%	16.8%	26.1%	13.7%
2009	11.9%	13.1%	18.6%	5.9%	12.6%
2010	12.9%	16.1%	22.7%	16.7%	14.5%
2011	13.9%	18.6%	26.3%	.0%	16.1%
2012	14.6%	19.7%	24.7%	28.6%	16.8%
2013	13.2%	16.8%	24.0%	12.5%	14.9%
Average	12.9%	15.8%	21.2%	21.0%	14.3%

Table D.II.10
Loan Applications by Selected Action Taken by Gender of Applicant
 Entitlement Areas of North Carolina
 2004–2013 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Male	Originated	47,112	55,043	57,296	44,847	28,877	22,528	20,548	19,034	23,206	28,559	347,050
	Denied	6,597	7,670	8,508	6,934	4,148	3,033	3,048	3,075	3,975	4,336	51,324
	Denial Rate	12.3%	12.2%	12.9%	13.4%	12.6%	11.9%	12.9%	13.9%	14.6%	13.2%	12.9%
Female	Originated	25,496	31,459	31,957	25,049	15,363	13,340	11,418	9,798	11,965	14,643	190,488
	Denied	4,623	5,393	5,958	4,649	2,779	2,003	2,198	2,244	2,936	2,947	35,730
	Denial Rate	15.3%	14.6%	15.7%	15.7%	15.3%	13.1%	16.1%	18.6%	19.7%	16.8%	15.8%
Not Available	Originated	2,510	3,401	4,348	4,203	2,820	1,885	1,524	1,396	1,373	1,871	25,331
	Denied	771	882	1,231	946	570	430	447	498	451	592	6,818
	Denial Rate	23.5%	20.6%	22.1%	18.4%	16.8%	18.6%	22.7%	26.3%	24.7%	24.0%	21.2%
Not Applicable	Originated	18	8	18	28	17	16	5	6	5	7	128
	Denied	6	2	7	8	6	1	1	0	2	1	34
	Denial Rate	25.0%	20.0%	28.0%	22.2%	26.1%	5.9%	16.7%	.0%	28.6%	12.5%	21.0%
Total	Originated	75,136	89,911	93,619	74,127	47,077	37,769	33,495	30,234	36,549	45,080	562,997
	Denied	11,997	13,947	15,704	12,537	7,503	5,467	5,694	5,817	7,364	7,876	93,906
	Denial Rate	13.8%	13.4%	14.4%	14.5%	13.7%	12.6%	14.5%	16.1%	16.8%	14.9%	14.3%

Table D.II.11
Denial Rates by Income of Applicant
 Entitlement Areas of North Carolina
 2004–2013 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
\$15,000 or Below	54.1%	61.7%	44.9%	60.2%	53.3%	57.9%	68.4%	68.0%	76.3%	71.0%	59.7%
\$15,001–\$30,000	28.3%	28.8%	31.5%	27.5%	28.1%	23.3%	29.8%	36.0%	37.6%	36.9%	30.2%
\$30,001–\$45,000	15.9%	16.3%	17.7%	17.1%	15.9%	13.7%	16.7%	19.4%	21.0%	19.3%	17.0%
\$45,001–\$60,000	12.9%	12.7%	15.0%	14.9%	13.6%	11.6%	12.5%	16.3%	16.5%	15.1%	14.0%
\$60,001–\$75,000	9.4%	10.1%	12.4%	12.9%	11.6%	9.7%	11.2%	11.9%	12.5%	12.0%	11.3%
Above \$75,000	7.1%	7.5%	8.7%	10.0%	9.6%	9.1%	9.1%	9.0%	9.3%	8.9%	8.7%
Data Missing	18.0%	11.6%	13.7%	18.0%	22.4%	32.8%	23.0%	19.9%	27.1%	18.8%	16.6%
Total	13.8%	13.4%	14.4%	14.5%	13.7%	12.6%	14.5%	16.1%	16.8%	14.9%	14.3%

Table D.II.12
Loan Applications by Income of Applicant: Originated and Denied
 Entitlement Areas of North Carolina
 2004–2013 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
\$15,000 or Below	Loan Originated	321	210	363	171	143	109	98	96	82	95	1,688
	Application Denied	379	339	296	259	163	150	212	204	264	233	2,499
	Denial Rate	54.1%	61.7%	44.9%	60.2%	53.3%	57.9%	68.4%	68.0%	76.3%	71.0%	59.7%
\$15,001 –\$30,000	Loan Originated	7,440	7,861	6,048	4,972	3,170	3,340	3,091	2,410	2,689	2,722	43,743
	Application Denied	2,938	3,172	2,784	1,887	1,236	1,017	1,309	1,355	1,622	1,590	18,910
	Denial Rate	28.3%	28.8%	31.5%	27.5%	28.1%	23.3%	29.8%	36.0%	37.6%	36.9%	30.2%
\$30,001 –\$45,000	Loan Originated	16,658	19,174	17,688	13,925	9,699	8,624	6,927	5,778	6,584	7,172	112,229
	Application Denied	3,155	3,738	3,805	2,881	1,840	1,372	1,384	1,393	1,754	1,711	23,033
	Denial Rate	15.9%	16.3%	17.7%	17.1%	15.9%	13.7%	16.7%	19.4%	21.0%	19.3%	17.0%
\$45,001 –\$60,000	Loan Originated	13,974	16,539	16,785	13,022	8,403	6,999	5,575	4,786	5,732	6,881	98,696
	Application Denied	2,078	2,396	2,955	2,278	1,320	920	799	933	1,132	1,226	16,037
	Denial Rate	12.9%	12.7%	15.0%	14.9%	13.6%	11.6%	12.5%	16.3%	16.5%	15.1%	14.0%
\$60,001 –\$75,000	Loan Originated	9,935	11,789	12,153	9,395	6,170	4,873	4,222	3,748	4,416	5,675	72,376
	Application Denied	1,033	1,325	1,722	1,394	809	522	534	508	633	771	9,251
	Denial Rate	9.4%	10.1%	12.4%	12.9%	11.6%	9.7%	11.2%	11.9%	12.5%	12.0%	11.3%
Above \$75,000	Loan Originated	24,298	30,333	35,902	30,640	19,101	13,543	13,064	12,739	16,291	21,531	217,442
	Application Denied	1,863	2,449	3,400	3,398	2,022	1,349	1,301	1,256	1,679	2,112	20,829
	Denial Rate	7.1%	7.5%	8.7%	10.0%	9.6%	9.1%	9.1%	9.0%	9.3%	8.9%	8.7%
Data Missing	Loan Originated	2,510	4,005	4,680	2,002	391	281	518	677	755	1,004	16,823
	Application Denied	551	528	742	440	113	137	155	168	280	233	3,347
	Denial Rate	18.0%	11.6%	13.7%	18.0%	22.4%	32.8%	23.0%	19.9%	27.1%	18.8%	16.6%
Total	Loan Originated	75,136	89,911	93,619	74,127	47,077	37,769	33,495	30,234	36,549	45,080	562,997
	Application Denied	11,997	13,947	15,704	12,537	7,503	5,467	5,694	5,817	7,364	7,876	93,906
	Denial Rate	13.8%	13.4%	14.4%	14.5%	13.7%	12.6%	14.5%	16.1%	16.8%	14.9%	14.3%

Table D.II.13
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
 Entitlement Areas of North Carolina
 2004–2013 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	58.6%	37.4%	26.3%	24.0%	15.9%	13.7%	22.8%	24.4%
Asian	60.3%	26.8%	16.6%	13.4%	10.8%	8.9%	16.8%	13.0%
Black	73.1%	39.1%	24.6%	21.9%	19.9%	18.5%	27.3%	25.2%
White	53.8%	23.6%	12.7%	10.3%	8.5%	6.9%	12.0%	10.5%
Not Available	58.1%	43.7%	25.6%	21.4%	16.7%	12.6%	26.8%	20.6%
Not Applicable	25.0%	24.5%	15.1%	14.3%	25.0%	15.2%	11.5%	15.8%
Average	59.7%	30.2%	17.0%	14.0%	11.3%	8.7%	16.6%	14.3%
Non-Hispanic	58.7%	27.9%	15.5%	12.7%	10.4%	8.1%	14.1%	12.9%
Hispanic	60.9%	30.3%	21.0%	17.8%	16.0%	13.6%	20.0%	21.0%

Table D.II.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 Entitlement Areas of North Carolina
 2004–2013 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	24	405	553	374	296	686	71	2,409
	Application Denied	34	242	197	118	56	109	21	777
	Denial Rate	58.6%	37.4%	26.3%	24.0%	15.9%	13.7%	22.8%	24.4%
Asian	Loan Originated	75	1,697	3,531	3,782	3,246	11,806	747	24,884
	Application Denied	114	622	704	584	393	1,150	151	3,718
	Denial Rate	60.3%	26.8%	16.6%	13.4%	10.8%	8.9%	16.8%	13.0%
Black	Loan Originated	292	10,956	25,179	18,341	10,305	17,429	1,814	84,316
	Application Denied	794	7,032	8,206	5,150	2,568	3,963	680	28,393
	Denial Rate	73.1%	39.1%	24.6%	21.9%	19.9%	18.5%	27.3%	25.2%
White	Loan Originated	1,078	27,325	73,395	67,104	51,309	163,690	11,665	395,566
	Application Denied	1,256	8,420	10,643	7,721	4,787	12,162	1,596	46,585
	Denial Rate	53.8%	23.6%	12.7%	10.3%	8.5%	6.9%	12.0%	10.5%
Not Available	Loan Originated	216	3,320	9,492	9,047	7,196	23,753	2,410	55,434
	Application Denied	300	2,581	3,269	2,456	1,439	3,431	884	14,360
	Denial Rate	58.1%	43.7%	25.6%	21.4%	16.7%	12.6%	26.8%	20.6%
Not Applicable	Loan Originated	3	40	79	48	24	78	116	388
	Application Denied	1	13	14	8	8	14	15	73
	Denial Rate	25.0%	24.5%	15.1%	14.3%	25.0%	15.2%	11.5%	15.8%
Total	Loan Originated	1,688	43,743	112,229	98,696	72,376	217,442	16,823	562,997
	Application Denied	2,499	18,910	23,033	16,037	9,251	20,829	3,347	93,906
	Denial Rate	59.7%	30.2%	17.0%	14.0%	11.3%	8.7%	16.6%	14.3%
Non-Hispanic	Loan Originated	1,261	34,518	93,209	83,107	61,584	186,228	12,926	472,833
	Application Denied	1,789	13,330	17,038	12,115	7,151	16,306	2,113	69,842
	Denial Rate	58.7%	27.9%	15.5%	12.7%	10.4%	8.1%	14.1%	12.9%
Hispanic	Loan Originated	178	5,697	9,031	5,928	3,069	5,724	1,387	31,014
	Application Denied	277	2,474	2,398	1,288	586	898	346	8,267
	Denial Rate	60.9%	30.3%	21.0%	17.8%	16.0%	13.6%	20.0%	21.0%

PREDATORY LENDING

Table D.II.15
Originated Owner-Occupied Loans by HAL Status
 Entitlement Areas of North Carolina
 2004–2013 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Other	66,591	70,336	75,189	66,871	44,839	36,783	33,344	30,018	36,257	44,826	505,054
HAL	8,545	19,575	18,430	7,256	2,238	986	151	216	292	254	57,943
Total	75,136	89,911	93,619	74,127	47,077	37,769	33,495	30,234	36,549	45,080	562,997
Percent HAL	11.4%	21.8%	19.7%	9.8%	4.8%	2.6%	.5%	.7%	.8%	.6%	10.3%

Table D.II.16
Loans by Loan Purpose by HAL Status

Entitlement Areas of North Carolina
2004–2013 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Home Purchase	Other	66,591	70,336	75,189	66,871	44,839	36,783	33,344	30,018	36,257	44,826	505,054
	HAL	8,545	19,575	18,430	7,256	2,238	986	151	216	292	254	57,943
	Percent HAL	11.4%	21.8%	19.7%	9.8%	4.8%	2.6%	.5%	.7%	.8%	.6%	10.3%
Home Improvement	Other	3,318	3,860	4,452	4,999	3,515	2,069	1,885	1,892	2,621	3,348	31,959
	HAL	1,370	1,844	2,013	1,641	678	236	151	117	109	92	8,251
	Percent HAL	29.2%	32.3%	31.1%	24.7%	16.2%	10.2%	7.4%	5.8%	4.0%	2.7%	20.5%
Refinancing	Other	52,396	43,288	36,101	37,881	44,472	86,279	67,597	58,898	84,221	65,494	576,627
	HAL	9,961	13,828	13,832	9,417	4,389	1,941	86	182	256	187	54,079
	Percent HAL	16.0%	24.2%	27.7%	19.9%	9.0%	2.2%	.1%	.3%	.3%	.3%	8.6%
Total	Other	122,305	117,484	115,742	109,751	92,826	125,131	102,826	90,808	123,099	113,668	1,113,640
	HAL	19,876	35,247	34,275	18,314	7,305	3,163	388	515	657	533	120,273
	Percent HAL	14.0%	23.1%	22.8%	14.3%	7.3%	2.5%	.4%	.6%	.5%	.5%	9.7%

Table D.II.17
HALs Originated by Race of Borrower

Entitlement Areas of North Carolina
2004–2013 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
American Indian	50	117	107	32	14	7	3	5	2	3	340
Asian	197	434	410	177	57	31	4	3	4	2	1,319
Black	3,258	7,601	6,340	2,209	548	242	25	31	32	46	20,332
White	3,868	8,942	8,962	3,842	1,380	641	107	157	237	188	28,324
Not Available	1,150	2,481	2,609	995	237	64	12	20	17	15	7,600
Not Applicable	22	0	2	1	2	1	0	0	0	0	28
Total	8,545	19,575	18,430	7,256	2,238	986	151	216	292	254	57,943
Non-Hispanic	6,539	15,381	14,137	5,419	1,730	783	75	100	120	116	44,400
Hispanic	627	1,745	2,105	959	275	134	51	59	132	89	6,176

Table D.II.18
Rate of HALs Originated by Race/Ethnicity of Borrower

Entitlement Areas of North Carolina
2004–2013 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Average
American Indian	14.2%	26.3%	24.9%	10.8%	8.3%	4.6%	2.0%	4.4%	1.5%	1.8%	14.1%
Asian	7.0%	12.3%	11.0%	5.4%	2.7%	1.8%	.3%	.2%	.2%	.1%	5.3%
Black	27.8%	47.3%	41.6%	20.3%	8.3%	4.4%	.5%	.8%	.7%	.9%	24.1%
White	7.4%	14.7%	14.0%	7.5%	4.2%	2.4%	.4%	.7%	.9%	.6%	7.2%
Not Available	14.8%	27.9%	25.4%	11.6%	4.7%	1.9%	.4%	.8%	.6%	.5%	13.7%
Not Applicable	8.2%	.0%	5.6%	5.6%	11.8%	5.9%	.0%	.0%	.0%	.0%	7.2%
Average	11.4%	21.8%	19.7%	9.8%	4.8%	2.6%	.5%	.7%	.8%	.6%	10.3%
Non-Hispanic	11.3%	20.3%	18.1%	8.8%	4.3%	2.4%	.3%	.4%	.4%	.3%	9.4%
Hispanic	16.6%	34.2%	34.2%	21.0%	11.0%	7.5%	3.0%	4.0%	7.5%	4.0%	19.9%

Table D.II.19
Loans by HAL Status by Race/Ethnicity of Borrower
 Entitlement Areas of North Carolina
 2004–2013 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
American Indian	Other	301	328	323	265	155	145	148	109	130	165	2,069
	HAL	50	117	107	32	14	7	3	5	2	3	340
	Percent HAL	14.2%	26.3%	24.9%	10.8%	8.3%	4.6%	2.0%	4.4%	1.5%	1.8%	14.1%
Asian	Other	2,600	3,089	3,319	3,107	2,056	1,717	1,589	1,524	2,018	2,546	23,565
	HAL	197	434	410	177	57	31	4	3	4	2	1,319
	Percent HAL	7.0%	12.3%	11.0%	5.4%	2.7%	1.8%	.3%	.2%	.2%	.1%	5.3%
Black	Other	8,471	8,467	8,885	8,648	6,069	5,217	4,831	3,864	4,392	5,140	63,984
	HAL	3,258	7,601	6,340	2,209	548	242	25	31	32	46	20,332
	Percent HAL	27.8%	47.3%	41.6%	20.3%	8.3%	4.4%	.5%	.8%	.7%	.9%	24.1%
White	Other	48,363	52,022	54,972	47,259	31,718	26,300	23,897	21,946	27,066	33,699	367,242
	HAL	3,868	8,942	8,962	3,842	1,380	641	107	157	237	188	28,324
	Percent HAL	7.4%	14.7%	14.0%	7.5%	4.2%	2.4%	.4%	.7%	.9%	.6%	7.2%
Not Available	Other	6,609	6,423	7,656	7,575	4,826	3,388	2,874	2,568	2,646	3,269	47,834
	HAL	1,150	2,481	2,609	995	237	64	12	20	17	15	7,600
	Percent HAL	14.8%	27.9%	25.4%	11.6%	4.7%	1.9%	.4%	.8%	.6%	.5%	13.7%
Not Applicable	Other	247	7	34	17	15	16	5	7	5	7	360
	HAL	22	0	2	1	2	1	0	0	0	0	28
	Percent HAL	8.2%	.0%	5.6%	5.6%	11.8%	5.9%	.0%	.0%	.0%	.0%	7.2%
Total	Other	66,591	70,336	75,189	66,871	44,839	36,783	33,344	30,018	36,257	44,826	505,054
	HAL	8,545	19,575	18,430	7,256	2,238	986	151	216	292	254	57,943
	Percent HAL	11.4%	21.8%	19.7%	9.8%	4.8%	2.6%	.5%	.7%	.8%	.6%	10.3%
Non-Hispanic	Other	51,220	60,412	64,067	56,266	38,085	31,843	28,880	26,160	32,061	39,439	428,433
	HAL	6,539	15,381	14,137	5,419	1,730	783	75	100	120	116	44,400
	Percent HAL	11.3%	20.3%	18.1%	8.8%	4.3%	2.4%	.3%	.4%	.4%	.3%	9.4%
Hispanic	Other	3,139	3,358	4,050	3,604	2,228	1,645	1,662	1,405	1,624	2,123	24,838
	HAL	627	1,745	2,105	959	275	134	51	59	132	89	6,176
	Percent HAL	16.6%	34.2%	34.2%	21.0%	11.0%	7.5%	3.0%	4.0%	7.5%	4.0%	19.9%

Table D.II.20
Rates of HALs by Income of Borrower
 Entitlement Areas of North Carolina
 2004–2013 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Average
\$15,000 or Below	16.8%	18.6%	16.8%	16.4%	16.1%	10.1%	4.1%	14.6%	4.9%	4.2%	14.3%
\$15,001–\$30,000	16.4%	32.3%	26.4%	15.1%	10.0%	5.0%	1.6%	3.0%	3.7%	2.2%	15.7%
\$30,001–\$45,000	14.9%	29.6%	24.0%	11.2%	5.9%	3.4%	.8%	1.1%	1.4%	1.3%	13.5%
\$45,001–\$60,000	14.7%	26.6%	24.0%	10.7%	4.5%	2.4%	.5%	.6%	.7%	.7%	12.7%
\$60,001–\$75,000	10.6%	20.7%	20.5%	9.9%	4.5%	1.8%	.2%	.4%	.3%	.4%	10.1%
Above \$75,000	5.8%	11.4%	12.0%	6.7%	3.4%	1.8%	.1%	.2%	.2%	.1%	5.6%
Data Missing	11.6%	25.4%	36.1%	27.3%	2.6%	4.6%	.2%	.0%	.0%	.1%	21.2%
Average	11.4%	21.8%	19.7%	9.8%	4.8%	2.6%	.5%	.7%	.8%	.6%	10.3%

Table D.II.21
Loans by HAL Status by Income of Borrower
 Entitlement Areas of North Carolina
 2004–2013 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
\$15,000 or Below	Other	267	171	302	143	120	98	94	82	78	91	1,446
	HAL	54	39	61	28	23	11	4	14	4	4	242
	Percent HAL	16.8%	18.6%	16.8%	16.4%	16.1%	10.1%	4.1%	14.6%	4.9%	4.2%	14.3%
\$15,001 –\$30,000	Other	6,221	5,320	4,454	4,221	2,853	3,173	3,043	2,338	2,589	2,661	36,873
	HAL	1,219	2,541	1,594	751	317	167	48	72	100	61	6,870
	Percent HAL	16.4%	32.3%	26.4%	15.1%	10.0%	5.0%	1.6%	3.0%	3.7%	2.2%	15.7%
\$30,001 –\$45,000	Other	14,176	13,489	13,439	12,371	9,122	8,329	6,875	5,712	6,493	7,081	97,087
	HAL	2,482	5,685	4,249	1,554	577	295	52	66	91	91	15,142
	Percent HAL	14.9%	29.6%	24.0%	11.2%	5.9%	3.4%	.8%	1.1%	1.4%	1.3%	13.5%
\$45,001 –\$60,000	Other	11,926	12,135	12,756	11,629	8,024	6,834	5,549	4,756	5,690	6,835	86,134
	HAL	2,048	4,404	4,029	1,393	379	165	26	30	42	46	12,562
	Percent HAL	14.7%	26.6%	24.0%	10.7%	4.5%	2.4%	.5%	.6%	.7%	.7%	12.7%
\$60,001 –\$75,000	Other	8,886	9,343	9,660	8,464	5,893	4,784	4,214	3,734	4,401	5,654	65,033
	HAL	1,049	2,446	2,493	931	277	89	8	14	15	21	7,343
	Percent HAL	10.6%	20.7%	20.5%	9.9%	4.5%	1.8%	0.2%	.4%	.3%	.4%	10.1%
Above \$75,000	Other	22,895	26,890	31,586	28,588	18,446	13,297	13,052	12,719	16,251	21,501	205,225
	HAL	1,403	3,443	4,316	2,052	655	246	12	20	40	30	12,217
	Percent HAL	5.8%	11.4%	12.0%	6.7%	3.4%	1.8%	.1%	.2%	.2%	.1%	5.6%
Data Missing	Other	2,220	2,988	2,992	1,455	381	268	517	677	755	1,003	13,256
	HAL	290	1,017	1,688	547	10	13	1	0	0	1	3,567
	Percent HAL	11.6%	25.4%	36.1%	27.3%	2.6%	4.6%	.2%	.0%	.0%	.1%	21.2%
Total	Other	66,591	70,336	75,189	66,871	44,839	36,783	33,344	30,018	36,257	44,826	505,054
	HAL	8,545	19,575	18,430	7,256	2,238	986	151	216	292	254	57,943
	Percent HAL	11.4%	21.8%	19.7%	9.8%	4.8%	2.6%	.5%	.7%	.8%	.6%	10.3%

III. HMDA DATA: STATE OF NORTH CAROLINA

Table D.III.1
Purpose of Loan by Year
 State of North Carolina
 2004–2013 HMDA Data

Purpose	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Home Purchase	334,842	408,685	434,085	347,683	215,267	173,341	162,995	158,833	177,635	210,221	2,623,587
Home Improvement	40,199	50,313	50,223	51,523	38,252	19,181	15,581	16,574	22,975	25,081	329,902
Refinancing	421,724	430,165	396,268	380,413	322,418	425,446	333,336	300,881	378,183	327,222	3,716,056
Total	796,765	889,163	880,576	779,619	575,937	617,968	511,912	476,288	578,793	562,524	6,669,545

Table D.III.2
Occupancy Status for Home Purchase Loan Applications
 State of North Carolina
 2004–2013 HMDA Data

Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Owner-Occupied	285,189	339,903	353,638	287,406	183,206	155,396	145,081	140,712	157,742	188,162	2,236,435
Not Owner-Occupied	47,964	66,568	78,360	58,673	30,964	17,642	17,718	17,834	19,630	21,736	377,089
Not Applicable	1,689	2,214	2,087	1,604	1,097	303	196	287	263	323	10,063
Total	334,842	408,685	434,085	347,683	215,267	173,341	162,995	158,833	177,635	210,221	2,623,587

Table D.III.3
Owner-Occupied Home Purchase Loan Applications by Loan Type
 State of North Carolina
 2004–2013 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Conventional	238,226	296,319	312,910	247,934	110,156	71,230	66,665	70,526	85,658	111,463	1,611,087
FHA - Insured	30,370	26,679	22,840	22,122	48,284	49,299	46,294	37,536	37,205	37,268	357,897
VA - Guaranteed	15,466	15,893	16,840	15,666	19,106	20,474	20,982	19,713	19,842	23,019	187,001
Rural Housing Service or Farm Service Agency	1,127	1,012	1,048	1,684	5,660	14,393	11,140	12,937	15,037	16,412	80,450
Total	285,189	339,903	353,638	287,406	183,206	155,396	145,081	140,712	157,742	188,162	2,236,435

DENIAL RATES

Table D.III.4
Loan Applications by Action Taken
 State of North Carolina
 2004–2013 HMDA Data

Action	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Loan Originated	149,046	178,451	182,512	147,996	96,866	78,481	70,983	65,036	73,036	89,699	1,132,106
Application Approved but not Accepted	15,643	18,349	21,398	16,166	7,785	4,025	5,157	8,125	7,860	10,393	114,901
Application Denied	35,128	37,858	39,716	32,394	18,800	14,396	16,991	18,256	23,403	24,752	261,694
Application Withdrawn by Applicant	17,620	22,737	20,199	16,950	13,521	10,642	10,229	9,357	10,205	13,490	144,950
File Closed for Incompleteness	3,832	4,638	4,710	4,315	2,839	2,415	2,239	2,250	2,181	2,441	31,860
Loan Purchased by the Institution	63,920	77,624	85,022	69,493	43,353	45,191	39,457	37,672	41,026	47,366	550,124
Preapproval Request Denied	0	244	73	88	42	246	22	16	19	13	763
Preapproval Approved but not Accepted	0	2	8	4	0	0	3	0	12	8	37
Total	285,189	339,903	353,638	287,406	183,206	155,396	145,081	140,712	157,742	188,162	2,236,435
Denial Rate	19.1%	17.5%	17.9%	18.0%	16.3%	15.5%	19.3%	21.9%	24.3%	21.6%	18.8%

Table D.III.5
Loan Applications by Reason for Denial

State of North Carolina
2004–2013 HMDA Data

Denial Reason	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Debt-to-Income Ratio	3,909	4,048	4,505	4,649	3,536	2,966	3,013	2,908	3,230	3,437	36,201
Employment History	505	576	745	696	444	394	373	330	383	378	4,824
Credit History	12,278	12,478	12,273	10,419	5,131	4,094	4,477	4,164	4,498	4,373	74,185
Collateral	1,706	2,374	2,922	2,487	1,786	1,707	1,734	1,523	1,598	2,107	19,944
Insufficient Cash	998	913	932	1,031	702	385	440	348	420	593	6,762
Unverifiable Information	935	1,161	1,473	1,357	774	487	555	446	491	556	8,235
Credit Application Incomplete	1,524	1,835	1,929	2,071	1,030	577	607	587	1,116	1,320	12,596
Mortgage Insurance Denied	22	16	11	40	64	51	37	28	25	13	307
Other	4,813	6,525	5,894	3,065	1,501	1,193	1,090	1,108	1,299	951	27,439
Missing	8,438	7,932	9,032	6,579	3,832	2,542	4,665	6,814	10,343	11,024	71,201
Total	35,128	37,858	39,716	32,394	18,800	14,396	16,991	18,256	23,403	24,752	261,694

Table D.III.6
Denial Rates by Race/Ethnicity of Applicant

State of North Carolina
2004–2013 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Average
American Indian	43.3%	37.7%	34.3%	32.4%	34.5%	29.1%	42.5%	49.4%	57.4%	50.9%	41.0%
Asian	16.7%	15.0%	13.4%	16.6%	17.2%	14.9%	16.0%	16.2%	15.8%	15.9%	15.7%
Black	31.0%	27.2%	30.4%	31.2%	25.9%	23.8%	30.2%	39.0%	46.0%	41.0%	31.6%
White	15.6%	14.4%	14.3%	14.6%	13.6%	13.3%	16.1%	17.4%	19.3%	17.4%	15.3%
Not Available	25.5%	24.0%	23.9%	22.6%	22.4%	21.4%	28.7%	32.4%	33.7%	31.5%	25.5%
Not Applicable	21.0%	16.7%	15.1%	8.1%	18.4%	05.6%	020.0%	45.8%	18.8%	10.0%	19.5%
Average	19.1%	17.5%	17.9%	18.0%	16.3%	15.5%	19.3%	21.9%	24.3%	21.6%	18.8%
Non-Hispanic	18.5%	16.2%	16.8%	17.0%	15.2%	14.6%	17.0%	18.1%	19.8%	17.7%	17.0%
Hispanic	28.6%	25.4%	22.3%	23.7%	22.7%	21.5%	25.0%	26.5%	29.4%	27.0%	25.0%

Table D.III.7
Loan Applications by Selected Action Taken by Race/Ethnicity of Applicant

State of North Carolina
 2004–2013 HMDA Data

Race		2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
American Indian	Originated	863	994	1,001	757	457	414	435	344	395	531	6,191
	Denied	658	601	522	362	241	170	322	336	533	550	4,295
	Denial Rate	43.3%	37.7%	34.3%	32.4%	34.5%	42.5%	42.5%	49.4%	57.4%	50.9%	41.0%
Asian	Originated	3,843	4,761	5,099	4,508	2,915	2,426	2,138	2,110	2,597	3,305	33,702
	Denied	772	842	791	899	607	425	407	407	486	627	6,263
	Denial Rate	16.7%	15.0%	13.4%	16.6%	17.2%	14.9%	16.0%	16.2%	15.8%	15.9%	15.7%
Black	Originated	18,375	24,526	23,590	17,586	11,077	8,952	8,271	6,873	7,095	8,351	134,696
	Denied	8,256	9,179	10,286	7,988	3,868	2,789	3,583	4,392	6,039	5,799	62,179
	Denial Rate	31.0%	27.2%	30.4%	31.2%	25.9%	23.8%	30.2%	39.0%	46.0%	41.0%	31.6%
White	Originated	111,528	132,272	134,862	110,157	73,667	60,378	54,655	50,690	58,213	71,594	858,016
	Denied	20,536	22,214	22,475	18,786	11,561	9,298	10,476	10,706	13,944	15,060	155,056
	Denial Rate	15.6%	14.4%	14.3%	14.6%	13.6%	13.3%	16.1%	17.4%	19.3%	17.4%	15.3%
Not Available	Originated	13,941	15,868	17,898	14,954	8,719	6,277	5,472	5,006	4,723	5,900	98,758
	Denied	4,774	5,016	5,631	4,356	2,516	1,712	2,200	2,404	2,398	2,714	33,721
	Denial Rate	25.5%	24.0%	23.9%	22.6%	22.4%	21.4%	28.7%	32.4%	33.7%	31.5%	25.5%
Not Applicable	Originated	496	30	62	34	31	34	12	13	13	18	743
	Denied	132	6	11	3	7	2	3	11	3	2	180
	Denial Rate	25.5%	24.0%	23.9%	22.6%	22.4%	21.4%	28.7%	32.4%	33.7%	31.5%	19.5%
Total	Originated	149,046	178,451	182,512	147,996	96,866	78,481	70,983	65,036	73,036	89,699	1,132,106
	Denied	35,128	37,858	39,716	32,394	18,800	14,396	16,991	18,256	23,403	24,752	261,694
	Denial Rate	19.1%	17.5%	17.9%	18.0%	16.3%	15.5%	19.3%	21.9%	24.3%	21.6%	18.8%
Non-Hispanic	Originated	115,516	153,540	156,174	126,427	84,290	69,135	62,390	57,078	64,984	79,380	968,914
	Denied	26,182	29,621	31,485	25,909	15,094	11,828	12,776	12,627	16,011	17,100	198,633
	Denial Rate	18.5%	16.2%	16.8%	17.0%	15.2%	14.6%	17.0%	18.1%	19.8%	17.7%	17.0%
Hispanic	Originated	6,613	8,587	10,077	7,654	4,387	3,203	3,090	2,712	3,012	3,817	53,152
	Denied	2,653	2,921	2,884	2,381	1,289	875	1,028	980	1,255	1,414	17,680
	Denial Rate	28.6%	25.4%	22.3%	23.7%	22.7%	21.5%	25.0%	26.5%	29.4%	27.0%	25.0%

Table D.III.8
Loan Applications by Reason for Denial by Race/Ethnicity of Applicant

State of North Carolina
 2004–2013 HMDA Data

Denial Reason	American Indian	Asian	Black	White	Not Available	Not Applicable	Total	Hispanic (Ethnicity)
Debt-to-Income Ratio	485	1,187	8,218	22,151	4,141	19	36,201	2,496
Employment History	55	238	750	3,203	574	4	4,824	490
Credit History	1,555	1,280	20,039	42,977	8,317	17	74,185	4,478
Collateral	170	504	2,679	14,292	2,275	24	19,944	1,380
Insufficient Cash	80	280	1,211	4,450	734	7	6,762	491
Unverifiable Information	58	437	1,680	4,873	1,157	30	8,235	979
Credit Application Incomplete	110	433	2,031	7,849	2,154	19	12,596	790
Mortgage Insurance Denied	4	6	67	185	45	0	307	19
Other	352	763	6,149	16,526	3,620	29	27,439	2,077
Missing	1,426	1,135	19,355	38,550	10,704	31	71,201	4,480
Total	4,295	6,263	62,179	155,056	33,721	180	261,694	17,680
% Missing	33.2%	18.1%	31.1%	24.9%	31.7%	17.2%	27.2%	25.3%

Table D.III.9
Denial Rates by Gender of Applicant
 State of North Carolina
 2004–2013 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2004	17.2%	21.7%	28.8%	16.4%	19.1%
2005	15.8%	19.9%	25.8%	13.2%	17.5%
2006	16.0%	20.4%	26.1%	18.8%	17.9%
2007	16.4%	20.1%	23.1%	18.6%	18.0%
2008	14.8%	18.3%	22.1%	30.8%	16.3%
2009	14.3%	16.7%	23.5%	8.6%	15.5%
2010	16.9%	22.1%	32.2%	20.0%	19.3%
2011	18.5%	26.4%	35.9%	26.3%	21.9%
2012	20.8%	29.8%	35.0%	22.2%	24.3%
2013	18.8%	25.5%	34.2%	10.0%	21.6%
Average	16.7%	21.6%	27.6%	18.6%	18.8%

Table D.III.10
Loan Applications by Selected Action Taken by Gender of Applicant
 State of North Carolina
 2004–2013 HMDA Data

Gender		2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Male	Originated	98,387	115,526	117,607	94,911	62,989	50,236	46,029	42,860	48,532	59,133	736,210
	Denied	20,473	21,641	22,383	18,663	10,906	8,364	9,339	9,761	12,738	13,711	147,979
	Denial Rate	17.2%	15.8%	16.0%	16.4%	14.8%	14.3%	16.9%	18.5%	20.8%	18.8%	16.7%
Female	Originated	45,978	56,777	57,306	45,698	29,164	24,845	21,987	19,483	22,094	27,299	350,631
	Denied	12,777	14,084	14,659	11,520	6,552	4,993	6,243	6,992	9,373	9,351	96,544
	Denial Rate	21.7%	19.9%	20.4%	20.1%	18.3%	16.7%	22.1%	26.4%	29.8%	25.5%	21.6%
Not Available	Originated	4,625	6,115	7,560	7,330	4,677	3,368	2,955	2,679	2,396	3,249	44,954
	Denied	1,867	2,128	2,665	2,198	1,326	1,036	1,406	1,498	1,288	1,688	17,100
	Denial Rate	28.8%	25.8%	26.1%	23.1%	22.1%	23.5%	32.2%	35.9%	35.0%	34.2%	27.6%
Not Applicable	Originated	56	33	39	57	36	32	12	14	14	18	311
	Denied	11	5	9	13	16	3	3	5	4	2	71
	Denial Rate	16.4%	13.2%	18.8%	18.6%	30.8%	8.6%	20.0%	26.3%	22.2%	10.0%	18.6%
Total	Originated	149,046	178,451	182,512	147,996	96,866	78,481	70,983	65,036	73,036	89,699	1,132,106
	Denied	35,128	37,858	39,716	32,394	18,800	14,396	16,991	18,256	23,403	24,752	261,694
	Denial Rate	19.1%	17.5%	17.9%	18.0%	16.3%	15.5%	19.3%	21.9%	24.3%	21.6%	18.8%

Table D.III.11
Denial Rates by Income of Applicant
 State of North Carolina
 2004–2013 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
\$15,000 or Below	63.0%	70.6%	58.2%	66.3%	58.7%	62.1%	72.5%	76.5%	82.0%	82.5%	68.8%
\$15,001–\$30,000	37.9%	36.8%	38.9%	37.2%	32.2%	28.2%	38.0%	44.3%	49.9%	48.1%	38.9%
\$30,001–\$45,000	21.4%	20.4%	21.6%	21.0%	18.7%	16.5%	21.0%	25.2%	28.8%	26.8%	21.7%
\$45,001–\$60,000	16.2%	15.2%	17.1%	17.1%	15.1%	13.3%	15.8%	20.0%	22.3%	20.7%	16.9%
\$60,001–\$75,000	11.4%	11.5%	13.8%	14.0%	12.6%	11.4%	13.7%	14.7%	16.6%	15.8%	13.3%
Above \$75,000	8.6%	8.9%	9.9%	10.9%	10.5%	10.3%	10.7%	10.7%	11.3%	10.7%	10.1%
Data Missing	20.0%	13.0%	14.6%	19.4%	37.1%	47.4%	38.6%	27.3%	33.1%	24.6%	20.1%
Total	19.1%	17.5%	17.9%	18.0%	16.3%	15.5%	19.3%	21.9%	24.3%	21.6%	18.8%

Table D.III.12
Loan Applications by Income of Applicant: Originated and Denied

State of North Carolina
 2004–2013 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
\$15,000 or Below	Loan Originated	902	645	854	560	366	302	290	280	255	236	4,690
	Application Denied	1,537	1,548	1,190	1,101	521	494	766	914	1,163	1,111	10,345
	Denial Rate	63.0%	70.6%	58.2%	66.3%	58.7%	62.1%	72.5%	76.5%	82.0%	82.5%	68.8%
\$15,001 –\$30,000	Loan Originated	17,914	18,198	14,402	11,888	7,664	7,761	7,526	6,430	6,673	6,873	105,329
	Application Denied	10,931	10,593	9,177	7,049	3,632	3,046	4,616	5,122	6,644	6,378	67,188
	Denial Rate	37.9%	36.8%	38.9%	37.2%	32.2%	28.2%	38.0%	44.3%	49.9%	48.1%	38.9%
\$30,001 –\$45,000	Loan Originated	34,321	38,669	35,520	29,458	20,693	18,894	15,907	13,771	14,658	16,679	238,570
	Application Denied	9,344	9,923	9,785	7,816	4,775	3,723	4,216	4,632	5,940	6,102	66,256
	Denial Rate	21.4%	20.4%	21.6%	21.0%	18.7%	16.5%	21.0%	25.2%	28.8%	26.8%	21.7%
\$45,001 –\$60,000	Loan Originated	28,805	34,507	34,212	26,575	18,317	15,396	13,097	11,608	12,571	15,111	210,199
	Application Denied	5,587	6,195	7,044	5,468	3,266	2,370	2,461	2,897	3,607	3,943	42,838
	Denial Rate	16.2%	15.2%	17.1%	17.1%	15.1%	13.3%	15.8%	20.0%	22.3%	20.7%	16.9%
\$60,001 –\$75,000	Loan Originated	19,654	23,833	24,253	19,552	13,469	10,677	9,284	8,408	9,449	12,014	150,593
	Application Denied	2,541	3,111	3,896	3,184	1,948	1,375	1,476	1,452	1,879	2,260	23,122
	Denial Rate	11.4%	11.5%	13.8%	14.0%	12.6%	11.4%	13.7%	14.7%	16.6%	15.8%	13.3%
Above \$75,000	Loan Originated	42,657	54,917	64,256	56,022	35,514	24,848	23,955	23,401	28,242	37,265	391,077
	Application Denied	3,990	5,342	7,081	6,827	4,160	2,844	2,876	2,812	3,582	4,462	43,976
	Denial Rate	8.6%	8.9%	9.9%	10.9%	10.5%	10.3%	10.7%	10.7%	11.3%	10.7%	10.1%
Data Missing	Loan Originated	4,793	7,682	9,015	3,941	843	603	924	1,138	1,188	1,521	31,648
	Application Denied	1,198	1,146	1,543	949	498	544	580	427	588	496	7,969
	Denial Rate	20.0%	13.0%	14.6%	19.4%	37.1%	47.4%	38.6%	27.3%	33.1%	24.6%	20.1%
Total	Loan Originated	149,046	178,451	182,512	147,996	96,866	78,481	70,983	65,036	73,036	89,699	1,132,106
	Application Denied	35,128	37,858	39,716	32,394	18,800	14,396	16,991	18,256	23,403	24,752	261,694
	Denial Rate	19.1%	17.5%	17.9%	18.0%	16.3%	15.5%	19.3%	21.9%	24.3%	21.6%	18.8%

Table D.III.13
Denial Rates of Loans by Race/Ethnicity and Income of Applicant

State of North Carolina
 2004–2013 HMDA Data

Race	<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	Above \$75K	Data Missing	Average
American Indian	79.4%	57.8%	41.7%	33.1%	29.4%	21.2%	33.5%	41.0%
Asian	63.2%	32.8%	20.3%	15.4%	11.6%	9.9%	18.8%	15.7%
Black	82.2%	50.5%	30.6%	25.4%	22.4%	20.4%	31.9%	31.6%
White	63.8%	33.4%	18.1%	14.1%	11.0%	8.4%	14.8%	15.3%
Not Available	69.0%	51.0%	30.3%	24.2%	18.9%	14.4%	36.1%	25.5%
Not Applicable	14.3%	27.7%	25.5%	16.2%	24.5%	12.9%	15.0%	19.5%
Average	68.8%	38.9%	21.7%	16.9%	13.3%	10.1%	20.1%	18.8%
Non-Hispanic	66.8%	36.4%	19.8%	15.5%	12.3%	9.4%	16.4%	17.0%
Hispanic	67.1%	36.5%	24.9%	20.0%	17.5%	15.1%	21.9%	25.0%

Table D.III.14
Loan Applications by Income and Race/Ethnicity of Applicant: Originated and Denied
 State of North Carolina
 2004–2013 HMDA Data

Race		<= \$15K	\$15K–\$30K	\$30K–\$45K	\$45K–\$60K	\$60K–\$75K	> \$75K	Data Missing	Total
American Indian	Loan Originated	71	1,173	1,569	1,104	724	1,425	125	6,191
	Application Denied	274	1,607	1,120	547	301	383	63	4,295
	Denial Rate	79.4%	57.8%	41.7%	33.1%	29.4%	21.2%	33.5%	41.0%
Asian	Loan Originated	126	2,628	5,146	5,457	4,394	14,918	1,033	33,702
	Application Denied	216	1,284	1,313	996	577	1,638	239	6,263
	Denial Rate	63.2%	32.8%	20.3%	15.4%	11.6%	9.9%	18.8%	15.7%
Black	Loan Originated	610	18,568	39,210	29,552	16,762	27,356	2,638	134,696
	Application Denied	2,810	18,946	17,282	10,069	4,837	6,999	1,236	62,179
	Denial Rate	82.2%	50.5%	30.6%	25.4%	22.4%	20.4%	31.9%	31.6%
White	Loan Originated	3,406	75,723	174,398	156,721	115,585	308,689	23,494	858,016
	Application Denied	5,996	37,897	38,614	25,683	14,352	28,449	4,065	155,056
	Denial Rate	63.8%	33.4%	18.1%	14.1%	11.0%	8.4%	14.8%	15.3%
Not Available	Loan Originated	471	7,138	18,101	17,272	13,088	38,574	4,114	98,758
	Application Denied	1,048	7,416	7,877	5,525	3,042	6,490	2,323	33,721
	Denial Rate	69.0%	51.0%	30.3%	24.2%	18.9%	14.4%	36.1%	25.5%
Not Applicable	Loan Originated	6	99	146	93	40	115	244	743
	Application Denied	1	38	50	18	13	17	43	180
	Denial Rate	14.3%	27.7%	25.5%	16.2%	24.5%	12.9%	15.0%	19.5%
Total	Loan Originated	4,690	105,329	238,570	210,199	150,593	391,077	31,648	1,132,106
	Application Denied	10,345	67,188	66,256	42,838	23,122	43,976	7,969	261,694
	Denial Rate	68.8%	38.9%	21.7%	16.9%	13.3%	10.1%	20.1%	18.8%
Non-Hispanic	Loan Originated	3,759	86,421	202,860	180,495	130,662	339,583	25,134	968,914
	Application Denied	7,574	49,405	50,215	33,111	18,277	35,107	4,944	198,633
	Denial Rate	66.8%	36.4%	19.8%	15.5%	12.3%	9.4%	16.4%	17.0%
Hispanic	Loan Originated	336	10,357	15,463	10,265	5,355	9,311	2,065	53,152
	Application Denied	684	5,943	5,117	2,571	1,136	1,651	578	17,680
	Denial Rate	67.1%	36.5%	24.9%	20.0%	17.5%	15.1%	21.9%	25.0%

PREDATORY LENDING

Table D.III.15
Originated Owner-Occupied Loans by HAL Status
 State of North Carolina
 2004–2013 HMDA Data

Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Other	129,694	138,889	145,425	131,578	90,996	75,676	69,881	63,639	71,321	87,937	1,005,036
HAL	19,352	39,562	37,087	16,418	5,870	2,805	1,102	1,397	1,715	1,762	127,070
Total	149,046	178,451	182,512	147,996	96,866	78,481	70,983	65,036	73,036	89,699	1,132,106
Percent HAL	13.0%	22.2%	20.3%	11.1%	6.1%	3.6%	1.6%	2.1%	2.3%	2.0%	11.2%

Table D.III.16
Loans by Loan Purpose by HAL Status
 State of North Carolina
 2004–2013 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
Home Purchase	Other	129,694	138,889	145,425	131,578	90,996	75,676	69,881	63,639	71,321	87,937	1,005,036
	HAL	19,352	39,562	37,087	16,418	5,870	2,805	1,102	1,397	1,715	1,762	127,070
	Percent HAL	13.0%	22.2%	20.3%	11.1%	6.1%	3.6%	1.6%	2.1%	2.3%	2.0%	11.2%
Home Improvement	Other	9,299	10,970	12,222	12,607	8,486	5,760	5,714	5,812	7,353	9,455	87,678
	HAL	3,965	5,695	5,940	4,885	2,563	972	430	333	272	213	25,268
	Percent HAL	29.9%	34.2%	32.7%	27.9%	23.2%	14.4%	7.0%	5.4%	3.6%	2.2%	22.4%
Refinancing	Other	118,168	103,306	90,526	92,814	103,093	184,043	144,582	128,272	171,251	138,839	1,274,894
	HAL	27,931	36,631	37,335	26,555	14,571	6,273	491	637	767	543	151,734
	Percent HAL	19.1%	26.2%	29.2%	22.2%	12.4%	3.3%	.3%	.5%	.4%	.4%	10.6%
Total	Other	257,161	253,165	248,173	236,999	202,575	265,479	220,177	197,723	249,925	236,231	2,367,608
	HAL	51,248	81,888	80,362	47,858	23,004	10,050	2,023	2,367	2,754	2,518	304,072
	Percent HAL	16.6%	24.4%	24.5%	16.8%	10.2%	3.6%	.9%	1.2%	1.1%	1.1%	11.4%

Table D.III.17
HALs Originated by Race of Borrower
 State of North Carolina
 2004–2013 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
American Indian	197	305	265	146	73	52	43	39	57	83	1,260
Asian	324	668	628	290	98	54	9	8	8	11	2,098
Black	5,257	11,303	9,621	3,631	1,002	429	191	289	334	328	32,385
White	11,295	22,498	21,639	10,411	4,216	2,136	777	938	1,198	1,198	76,306
Not Available	2,229	4,788	4,932	1,938	479	132	82	123	118	142	14,963
Not Applicable	50	0	2	2	2	2	0	0	0	0	58
Total	19,352	39,562	37,087	16,418	5,870	2,805	1,102	1,397	1,715	1,762	127,070
Non-Hispanic	15,128	31,884	29,460	13,033	4,862	2,404	713	721	901	888	99,994
Hispanic	1,244	2,855	3,410	1,609	534	259	115	112	246	174	10,558

Table D.III.18
Rate of HALs Originated by Race/Ethnicity of Borrower
 State of North Carolina
 2004–2013 HMDA Data

Race	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Average
American Indian	22.8%	30.7%	26.5%	19.3%	16.0%	12.6%	9.9%	11.3%	14.4%	15.6%	20.4%
Asian	8.4%	14.0%	12.3%	6.4%	3.4%	2.2%	.4%	.4%	.3%	.3%	6.2%
Black	28.6%	46.1%	40.8%	20.6%	9.0%	4.8%	2.3%	4.2%	4.7%	3.9%	24.0%
White	10.1%	17.0%	16.0%	9.5%	5.7%	3.5%	1.4%	1.9%	2.1%	1.7%	8.9%
Not Available	16.0%	30.2%	27.6%	13.0%	5.5%	2.1%	1.5%	2.5%	2.5%	2.4%	15.2%
Not Applicable	10.1%	.0%	3.2%	5.9%	6.5%	5.9%	.0%	.0%	.0%	.0%	7.8%
Average	13.0%	22.2%	20.3%	11.1%	6.1%	3.6%	1.6%	2.1%	2.3%	2.0%	11.2%
Non-Hispanic	13.1%	20.8%	18.9%	10.3%	5.8%	3.5%	1.1%	1.3%	1.4%	1.1%	10.3%
Hispanic	18.8%	33.2%	33.8%	21.0%	12.2%	8.1%	3.7%	4.1%	8.2%	4.6%	19.9%

Table D.III.19
Loans by HAL Status by Race/Ethnicity of Borrower
 State of North Carolina
 2004–2013 HMDA Data

Race	Loan Type	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
American Indian	Other	666	689	736	611	384	362	392	305	338	448	4,931
	HAL	197	305	265	146	73	52	43	39	57	83	1,260
	Percent HAL	22.8%	30.7%	26.5%	19.3%	16.0%	12.6%	9.9%	11.3%	14.4%	15.6%	20.4%
Asian	Other	3,519	4,093	4,471	4,218	2,817	2,372	2,129	2,102	2,589	3,294	31,604
	HAL	324	668	628	290	98	54	9	8	8	11	2,098
	Percent HAL	8.4%	14.0%	12.3%	6.4%	3.4%	2.2%	.4%	.4%	.3%	.3%	6.2%
Black	Other	13,118	13,223	13,969	13,955	10,075	8,523	8,080	6,584	6,761	8,023	102,311
	HAL	5,257	11,303	9,621	3,631	1,002	429	191	289	334	328	32,385
	Percent HAL	28.6%	46.1%	40.8%	20.6%	9.0%	4.8%	2.3%	4.2%	4.7%	3.9%	24.0%
White	Other	100,233	109,774	113,223	99,746	69,451	58,242	53,878	49,752	57,015	70,396	781,710
	HAL	11,295	22,498	21,639	10,411	4,216	2,136	777	938	1,198	1,198	76,306
	Percent HAL	10.1%	17.0%	16.0%	9.5%	5.7%	3.5%	1.4%	1.9%	2.1%	1.7%	8.9%
Not Available	Other	11,712	11,080	12,966	13,016	8,240	6,145	5,390	4,883	4,605	5,758	83,795
	HAL	2,229	4,788	4,932	1,938	479	132	82	123	118	142	14,963
	Percent HAL	16.0%	30.2%	27.6%	13.0%	5.5%	2.1%	1.5%	2.5%	2.5%	2.4%	15.2%
Not Applicable	Other	446	30	60	32	29	32	12	13	13	18	685
	HAL	50	0	2	2	2	2	0	0	0	0	58
	Percent HAL	10.1%	.0%	3.2%	5.9%	6.5%	5.9%	.0%	.0%	.0%	.0%	7.8%
Total	Other	129,694	138,889	145,425	131,578	90,996	75,676	69,881	63,639	71,321	87,937	1,005,036
	HAL	19,352	39,562	37,087	16,418	5,870	2,805	1,102	1,397	1,715	1,762	127,070
	Percent HAL	13.0%	22.2%	20.3%	11.1%	6.1%	3.6%	1.6%	2.1%	2.3%	2.0%	11.2%
Non-Hispanic	Other	100,388	121,656	126,714	113,394	79,428	66,731	61,677	56,357	64,083	78,492	868,920
	HAL	15,128	31,884	29,460	13,033	4,862	2,404	713	721	901	888	99,994
	Percent HAL	13.1%	20.8%	18.9%	10.3%	5.8%	3.5%	1.1%	1.3%	1.4%	1.1%	10.3%
Hispanic	Other	5,369	5,732	6,667	6,045	3,853	2,944	2,975	2,600	2,766	3,643	42,594
	HAL	1,244	2,855	3,410	1,609	534	259	115	112	246	174	10,558
	Percent HAL	18.8%	33.2%	33.8%	21.0%	12.2%	8.1%	3.7%	4.1%	8.2%	4.6%	19.9%

Table D.III.20
Rates of HALs by Income of Borrower
 State of North Carolina
 2004–2013 HMDA Data

Income	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Average
\$15,000 or Below	25.9%	27.8%	18.6%	24.5%	19.7%	13.2%	7.2%	17.1%	16.5%	9.7%	20.4%
\$15,001–\$30,000	19.9%	32.0%	26.5%	18.3%	12.7%	6.6%	4.7%	7.1%	8.6%	7.0%	17.8%
\$30,001–\$45,000	16.3%	28.8%	23.7%	12.4%	7.2%	4.0%	2.2%	3.0%	3.8%	3.7%	13.8%
\$45,001–\$60,000	14.9%	25.8%	23.4%	11.7%	5.7%	3.2%	1.5%	2.2%	2.2%	2.1%	12.8%
\$60,001–\$75,000	11.4%	20.6%	20.5%	10.4%	5.0%	2.7%	.9%	1.3%	1.2%	1.4%	10.3%
Above \$75,000	6.8%	12.3%	13.4%	7.6%	4.4%	2.8%	.4%	.5%	.5%	.4%	6.5%
Data Missing	11.2%	24.0%	34.4%	25.9%	4.2%	5.5%	.2%	.0%	.0%	.9%	20.8%
Average	13.0%	22.2%	20.3%	11.1%	6.1%	3.6%	1.6%	2.1%	2.3%	2.0%	11.2%

Table D.III.21
Loans by HAL Status by Income of Borrower

State of North Carolina
2004–2013 HMDA Data

Income		2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Total
\$15,000 or Below	Other	668	466	695	423	294	262	269	232	213	213	3,735
	HAL	234	179	159	137	72	40	21	48	42	23	955
	Percent HAL	25.9%	27.8%	18.6%	24.5%	19.7%	13.2%	7.2%	17.1%	16.5%	9.7%	20.4%
\$15,001 –\$30,000	Other	14,346	12,380	10,581	9,713	6,689	7,252	7,175	5,976	6,102	6,395	86,609
	HAL	3,568	5,818	3,821	2,175	975	509	351	454	571	478	18,720
	Percent HAL	19.9%	32.0%	26.5%	18.3%	12.7%	6.6%	4.7%	7.1%	8.6%	7.0%	17.8%
\$30,001 –\$45,000	Other	28,728	27,521	27,088	25,801	19,202	18,137	15,556	13,361	14,098	16,061	205,553
	HAL	5,593	11,148	8,432	3,657	1,491	757	351	410	560	618	33,017
	Percent HAL	16.3%	28.8%	23.7%	12.4%	7.2%	4.0%	2.2%	3.0%	3.8%	3.7%	13.8%
\$45,001 –\$60,000	Other	24,520	25,611	26,190	23,462	17,274	14,903	12,900	11,349	12,289	14,800	183,298
	HAL	4,285	8,896	8,022	3,113	1,043	493	197	259	282	311	26,901
	Percent HAL	14.9%	25.8%	23.4%	11.7%	5.7%	3.2%	1.5%	2.2%	2.2%	2.1%	12.8%
\$60,001 –\$75,000	Other	17,422	18,928	19,284	17,510	12,795	10,390	9,203	8,296	9,332	11,849	135,009
	HAL	2,232	4,905	4,969	2,042	674	287	81	112	117	165	15,584
	Percent HAL	11.4%	20.6%	20.5%	10.4%	5.0%	2.7%	0.9%	1.3%	1.2%	1.4%	10.3%
Above \$75,000	Other	39,755	48,143	55,676	51,749	33,934	24,162	23,856	23,287	28,099	37,111	365,772
	HAL	2,902	6,774	8,580	4,273	1,580	686	99	114	143	154	25,305
	Percent HAL	6.8%	12.3%	13.4%	7.6%	4.4%	2.8%	.4%	.5%	.5%	.4%	6.5%
Data Missing	Other	4,255	5,840	5,911	2,920	808	570	922	1,138	1,188	1,508	25,060
	HAL	538	1,842	3,104	1,021	35	33	2	0	0	13	6,588
	Percent HAL	11.2%	24.0%	34.4%	25.9%	4.2%	5.5%	.2%	.0%	.0%	.9%	20.8%
Total	Other	129,694	138,889	145,425	131,578	90,996	75,676	69,881	63,639	71,321	87,937	1,005,036
	HAL	19,352	39,562	37,087	16,418	5,870	2,805	1,102	1,397	1,715	1,762	127,070
	Percent HAL	13.0%	22.2%	20.3%	11.1%	6.1%	3.6%	1.6%	2.1%	2.3%	2.0%	11.2%

E. ADDITIONAL TABLES

ADDITIONAL CENSUS TABLE

Table E.1
Cost Burden and Severe Cost Burden by Tenure
 Non-Entitlement Areas of North Carolina
 2000 Census & 2013 Five-Year ACS Data

Data Source	Less Than 30%		31%-50%		Above 50%		Not Computed		Total
	Households	% of Total	Households	% of Total	Households	% of Total	Households	% of Total	
Owner With a Mortgage									
2000 Census	458,289	73.6%	104,149	16.7%	56,363	9.1%	3,622	0.6%	622,423
2013 Five-Year ACS	634,572	66.7%	187,873	19.7%	123,291	13.0%	5,663	0.6%	951,399
Owner Without a Mortgage									
2000 Census	308,874	87.9%	21,633	6.2%	13,631	3.9%	7,140	2.0%	351,278
2013 Five-Year ACS	508,260	84.9%	48,667	8.1%	33,201	5.5%	8,525	1.4%	598,653
Renter									
2000 Census	239,867	55.1%	68,539	15.8%	62,877	14.5%	63,705	14.6%	434,988
2013 Five-Year ACS	239,490	41.4%	123,495	21.3%	131,304	22.7%	84,787	14.6%	579,076
Total									
2000 Census	1,007,030	71.5%	194,321	13.8%	132,871	9.4%	74,467	5.3%	1,408,689
2013 Five-Year ACS	1,382,322	64.9%	360,035	16.9%	287,796	13.5%	98,975	4.6%	2,129,128

HUD FAIR HOUSING COMPLAINTS: FULL TABLES

Table E.2
Fair Housing Complaints by Issue
 Non-Entitlement Areas of North Carolina
 2004–2014 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
Discrimination in term, conditions or privileges relating to rental	26	11	20	23	21	22	26	7	7	4	8	175
Discriminatory terms, conditions, privileges, or services and facilities	3	3	10	11	14	7	16	12	21	18	17	132
Discriminatory acts under Section 818 (coercion, etc.)	6	6	10	8	2	5	11	8	13	9	11	89
Failure to make reasonable accommodation	4	6	7	7	14	10	9	6	8	6	9	86
Discriminatory refusal to rent	4	1	6	16	14	12	11	5	3	5	3	80
Discriminatory advertising, statements and notices	3	2	2	4	4	6	4	7	8	6	7	53

Otherwise deny or make housing available	2		1		2	4	8		10	7	6	40
Discriminatory financing (includes real estate transactions)	21	1		3	1		3	3		1		33
Discriminatory refusal to rent and negotiate for rental	2		1	2	8	1	6	4	2	1	3	30
Failure to permit reasonable modification	2		3		1	1	1	4	1		4	17
False denial or representation of availability - rental			2	2	4		1	3	2		1	15
Discrimination in terms, conditions, privileges relating to sale	3	3	2			3	2	1			1	15
Discriminatory refusal to sell and negotiate for sale		1			3		1	3		3		11
Discriminatory refusal to sell	3	1	1		1			2			1	9
Discrimination in the terms or conditions for making loans		1		1			4	1				7
Discrimination in services and facilities relating to rental	1		1	2	1		2					7
Using ordinances to discriminate in zoning and land use			2	1			1		3			7
Steering					2	1	1	1			1	6
Other discriminatory acts	1		2						2			5
Discriminatory refusal to negotiate for sale	2					1				1		4
Discriminatory refusal to negotiate for rental	1				1				1		1	4
Discrimination in the selling of residential real property						1				2		3
Discrimination in the appraising of residential real property		1					1		1			3
Restriction of choices relative to a rental			2		1							3
False denial or representation of availability - sale							1			1		2
Refusing to provide municipal services or property		1					1					2
Failure to provide an accessible building entrance		1						1				2
Failure to provide an accessible route into and thru the covered unit								2				2
Discriminatory advertisement - rental			1									1
False denial or representation of availability		1										1
Discrimination in making of loans					1							1
Discrimination in the brokering of residential real property					1							1
Discrimination in terms and conditions of membership		1										1
Discrimination in services and facilities relating to sale								1				1
Adverse action against an employee						1						1
Non-compliance with design and construction requirements (handicap)		1										1
Discriminatory acts under Section 901 (Criminal)											1	1
Total Issues	84	42	73	80	96	75	110	71	82	64	74	851
Total Complaints	64	30	49	62	71	50	64	40	34	24	26	514

Table E.3
Resolved Fair Housing Complaints by Issue
 Non-Entitlement Areas of North Carolina
 2004–2014 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
Discrimination in term, conditions or privileges relating to rental	9	8	5	3	7	5	7	1	3	1	2	51
Failure to make reasonable accommodation	3	3	3	4	6	2	2	1	2		5	31
Discriminatory terms, conditions, privileges, or services and facilities		1	4	2	4	4	1	1	2	3	7	29
Discriminatory acts under Section 818 (coercion, etc.)	1	2	3	1		1	4	1	2	2	4	21
Discriminatory refusal to rent		1	2	5	3	3	2	2			2	20
Discriminatory advertising, statements and notices	1			1		2	2	3	1	2	2	14
Otherwise deny or make housing available	2					1	2		1	4	1	11
Failure to permit reasonable modification	1		2		1	1		1	1		3	10
Discriminatory refusal to rent and negotiate for rental				1	1		1	1			1	5
False denial or representation of availability - rental				1	2			1				4
Discrimination in terms, conditions, privileges relating to sale	1		1			1	1					4
Discriminatory financing (includes real estate transactions)				1			1	1				3
Discrimination in services and facilities relating to rental				1	1							2
Other discriminatory acts	1		1									2
Discriminatory refusal to sell	1											1
Discriminatory refusal to negotiate for sale	1											1
Discriminatory refusal to sell and negotiate for sale								1				1
Discriminatory refusal to negotiate for rental									1			1
Discrimination in the appraising of residential real property									1			1
Discrimination in terms and conditions of membership		1										1
Steering											1	1
Restriction of choices relative to a rental			1									1
Refusing to provide municipal services or property		1										1
Non-compliance with design and construction requirements (handicap)		1										1
Failure to provide an accessible building entrance		1										1
Failure to provide an accessible route into and thru the covered unit								1				1
Total Issues	21	19	22	20	25	20	23	15	14	12	28	219
Total Complaints	14	16	16	17	21	14	12	9	8	4	9	140

HUD COMPLAINT DATA: ENTITLEMENT AREAS OF NORTH CAROLINA

Table E.4
Fair Housing Complaints by Basis

Entitlement Areas of North Carolina
2004–2014 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
Race	67	60	77	75	62	54	87	64	39	44	28	657
Disability	55	48	47	42	51	44	60	65	41	41	49	543
National Origin	59	30	37	36	62	30	40	60	39	29	21	443
Family Status	17	23	15	13	19	19	39	41	27	22	18	253
Sex	20	21	21	19	17	18	31	13	14	16	11	201
Retaliation	3	3	3	6	2	1	4	3	15	6	12	58
Religion	2	3	2	5	2	3	5	1	1	1	1	26
Color		1				1	4	1	4	1	1	13
Total Bases	223	189	202	196	215	170	270	248	180	160	141	2,194
Total Complaints	179	142	153	153	179	132	191	195	132	122	103	1,681

Table E.5
Fair Housing Complaints by Closure Status

Entitlement Areas of North Carolina
2004–2014 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total	
No Cause	86	64	66	65	80	61	71	77	47	53	49	719	
Conciliated / Settled	48	47	45	39	46	27	67	72	59	45	35	530	
Withdrawal After Resolution	9	8	7	9	12	17	25	16	11	11	6	131	
Complainant Failed to Cooperate	5	10	7	19	28	14	12	9	6	4	3	117	
Withdrawal Without Resolution	6	2	14	11	10	5	7	1	6	1	4	67	
Unable to Locate Respondent	19	4	2	3	1	2	5	17	1	2		56	
Lack of Jurisdiction	6	3	4	2	2	3		2	1	1		24	
Litigation Ended – Discrimination Found		3	3									6	
Untimely Filed				3	2							5	
DOJ Dismissal					2		1					3	
FHAP Judicial Dismissal					1				1			2	
Election Made to Go to Court							1					1	
Open			1	2			2	3		1	5	6	20
Total Complaints	179	142	153	153	179	132	191	195	132	122	103	1,681	

Table E.6
Fair Housing Complaints by Issue
 Entitlement Areas of North Carolina
 2004–2014 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
Discrimination in term, conditions or privileges relating to rental	54	53	75	64	79	55	99	84	71	47	41	722
Discriminatory terms, conditions, privileges, or services and facilities	51	23	17	18	37	27	29	59	29	47	43	380
Failure to make reasonable accommodation	19	16	18	20	20	21	31	31	19	20	28	243
Discriminatory refusal to rent	16	9	14	23	24	10	28	24	14	16	9	187
Discriminatory acts under Section 818 (coercion, etc.)	8	19	26	16	12	9	16	12	26	17	23	184
Discriminatory advertising, statements and notices	2	1	1	2	10	6	15	13	17	20	21	108
Otherwise deny or make housing available	2	2		5	3		14	3	17	11	19	76
Discrimination in services and facilities relating to rental	10	9	3		3	5	9	8	4	7	2	60
Discrimination in terms, conditions, privileges relating to sale	3	8	6	10	3	9	5	1	4	2	2	53
Discriminatory refusal to rent and negotiate for rental	5	1	3	1	3	1	3	3	6	5	13	44
Discriminatory financing (includes real estate transactions)	5	1		4	6	4	13	3	4	1		41
Failure to permit reasonable modification	1	4	3			1	4	8	4	4	4	33
Other discriminatory acts	4	2	6	6	1	2		1	2	3		27
Discrimination in the terms or conditions for making loans	3	1	1	1	2	1	6	2	3	3		23
False denial or representation of availability - rental	3	3	2	1	1	1		3	1	2	5	22
Discriminatory refusal to sell	3	1	2	5	2	1	1	2	2	2		21
Non-compliance with design and construction requirements (handicap)	6	3	1					1		3		14
Failure to provide accessible and usable public and common user areas	4				4			1	1	4		14
Steering	2	3	1	1	1	1	1		1	1	1	13
Refusing to provide municipal services or property					2					9		11
Discriminatory refusal to sell and negotiate for sale	1	2	1	2		1	1		1	1		10
Discrimination in making of loans	3	1		1	1	3			1			10
False denial or representation of availability				4					1	3	1	9
Discrimination in the selling of residential real property		2		4			2		1			9
Discrimination in terms and conditions of membership			1	2	1	3	1	1				9
Using ordinances to discriminate in zoning and land use			1	2	1		2				1	7
Discriminatory refusal to negotiate for sale	1		1	1		1				1	1	6
Discriminatory refusal to negotiate for rental		1	1	1			1	1		1		6
False denial or representation of availability - sale	1			2			1		1	1		6
Discriminatory advertisement - rental					3				2			5
Failure to provide an accessible building entrance					1	1				3		5

Discrimination in the appraising of residential real property	2	1				1						4
Use of discriminatory indicators		1				2					1	4
Failure to provide an accessible route into and thru the covered unit	3									1		4
Discrimination in services and facilities relating to sale					1					2		3
Adverse action against an employee	1							1		1		3
Failure to provide usable kitchens and bathrooms	1										2	3
Discriminatory advertising - sale					1	1						2
Failure to provide usable doors											2	2
Discriminatory acts under Section 901 (Criminal)										1	1	2
Discriminatory brokerage service	1											1
Redlining - mortgage						1						1
Restriction of choices relative to a sale											1	1
Other non-compliance with design and construction requirements	1											1
Total Issues	216	167	184	198	222	166	283	262	235	240	216	2,389
Total Complaints	179	142	153	153	179	132	191	195	132	122	103	1,681

Resolved HUD Complaints

Table E.7
Resolved Fair Housing Complaints by Basis
 Entitlement Areas of North Carolina
 2004–2014 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
Disability	27	23	18	18	17	20	29	32	19	20	25	248
Race	15	20	27	18	9	11	38	30	18	14	8	208
National Origin	15	13	12	13	32	7	25	25	28	20	8	198
Family Status	7	11	4	3	4	9	24	24	20	13	11	130
Sex	4	4	7	4	4	7	10	3	7	5	6	61
Retaliation	1			4	1	1	1		2	1	4	15
Religion				1		1	2					4
Color									2	1		3
Total Bases	69	71	68	61	67	56	129	114	96	74	62	867
Total Complaints	57	58	55	48	58	44	92	88	70	56	41	667

Table E.8
Resolved Fair Housing Complaints by Issue

Entitlement Areas of North Carolina
 2004–2014 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
Discrimination in term, conditions or privileges relating to rental	17	19	24	20	27	21	57	48	50	28	23	334
Failure to make reasonable accommodation	10	9	12	10	11	13	17	15	11	9	15	132
Discriminatory terms, conditions, privileges, or services and facilities	12	12	9	9	14	9	10	16	9	16	13	129
Discriminatory advertising, statements and notices	1			1	5	1	7	4	5	14	13	51
Discriminatory refusal to rent	6	3	1	5	2	1	7	9	5	6	2	47
Discriminatory acts under Section 818 (coercion, etc.)		8	6	4	5	2	1	4	4	4	8	46
Discrimination in services and facilities relating to rental	5	5	1		2	1	4	7	1	5	1	32
Otherwise deny or make housing available	1			1	1		5	2	4	4	9	27
Failure to permit reasonable modification	1	1	1			1	1	5	3	3	1	17
Discriminatory refusal to rent and negotiate for rental	2				1	1		1	2	1	2	10
False denial or representation of availability - rental	1	1		1		1		2		1	2	9
Discrimination in terms, conditions, privileges relating to sale		3	3		1				1	1		9
Other discriminatory acts		1	1	2		2			1	1		8
Non-compliance with design and construction requirements (handicap)	2	3						1		2		8
Discriminatory financing (includes real estate transactions)					1		3		2			6
Discriminatory refusal to sell	1		2	2								5
Failure to provide accessible and usable public and common user areas	3				1					1		5
Discriminatory refusal to negotiate for rental			1	1				1		1		4
Steering	1	1			1						1	4
Discriminatory refusal to sell and negotiate for sale		1	1						1			3
Discrimination in making of loans						3						3
Discrimination in terms and conditions of membership			1	1	1							3
Use of discriminatory indicators		1				1					1	3
Using ordinances to discriminate in zoning and land use			1				1				1	3
Failure to provide an accessible building entrance					1	1				1		3
Discriminatory advertisement - rental					1				1			2
False denial or representation of availability				1						1		2

Discrimination in the terms or conditions for making loans							1		1			2
Adverse action against an employee	1						1					2
Failure to provide an accessible route into and thru the covered unit	1									1		2
Discriminatory refusal to negotiate for sale						1						1
Discrimination in services and facilities relating to sale									1			1
Failure to provide usable doors										1		1
Other non-compliance with design and construction requirements	1											1
Total Issues	66	68	64	58	75	59	115	115	102	101	92	915
Total Complaints	57	58	55	48	58	44	92	88	70	56	41	667

HUD COMPLAINT DATA: STATE OF NORTH CAROLINA

Table E.9
Fair Housing Complaints by Basis

State of North Carolina
2004–2014 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
Race	111	74	106	114	99	80	125	83	53	52	36	933
Disability	70	62	67	62	79	65	82	82	56	49	63	737
National Origin	64	31	40	42	63	35	43	64	42	30	24	478
Family Status	23	25	21	21	31	22	50	43	32	25	18	311
Sex	30	22	29	25	19	26	41	16	17	22	12	259
Retaliation	6	3	3	8	3	3	5	5	22	9	17	84
Religion	3	3	2	8	3	4	5	1	2	2	2	35
Color	1	2	1			4	4	1	5	1	1	20
Total Bases	308	222	269	280	297	239	355	295	229	190	173	2,857
Total Complaints	243	172	202	215	250	182	255	235	166	146	129	2,195

Table E.10
Fair Housing Complaints by Closure Status

State of North Carolina
2004–2014 HUD Data

Closure Status	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
No Cause	129	77	87	93	111	85	112	101	66	69	60	990
Conciliated / Settled	60	60	57	54	59	35	71	77	62	48	41	624
Withdrawal After Resolution	11	10	10	11	20	23	33	20	16	12	9	175
Complainant Failed to Cooperate	7	10	12	25	39	19	19	10	7	5	3	156
Withdrawal Without Resolution	9	2	16	17	17	10	11	5	10	2	6	105
Unable to Locate Respondent	20	4	2	3	2	2	5	18	1	2		59
Lack of Jurisdiction	6	3	6	7	2	4		2	2	1		33
Litigation Ended – Discrimination Found			4	4								8
Untimely Filed		1		3	2							6
DOJ Dismissal				1	2		1					4
FHAP Judicial Dismissal					1			2				3
FHAP Judicial Consent Order				1						1		2
Election Made to Go to Court				1			1					2
Administrative Hearing Ended – No Discrimination Found			1									1
Open			1	2		3	3		2	6	10	27
Total Complaints	243	172	202	215	250	182	255	235	166	146	129	2,195

Table E.11
Fair Housing Complaints by Issue
 State of North Carolina
 2004–2014 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
Discrimination in term, conditions or privileges relating to rental	80	64	95	87	100	77	125	91	78	51	49	897
Discriminatory terms, conditions, privileges, or services and facilities	54	26	27	29	51	34	45	71	50	65	60	512
Failure to make reasonable accommodation	23	22	25	27	34	31	40	37	27	26	37	329
Discriminatory acts under Section 818 (coercion, etc.)	14	25	36	24	14	14	27	20	39	26	34	273
Discriminatory refusal to rent	20	10	20	39	38	22	39	29	17	21	12	267
Discriminatory advertising, statements and notices	5	3	3	6	14	12	19	20	25	26	28	161
Otherwise deny or make housing available	4	2	1	5	5	4	22	3	27	18	25	116
Discriminatory refusal to rent and negotiate for rental	7	1	4	3	11	2	9	7	8	6	16	74
Discriminatory financing (includes real estate transactions)	26	2		7	7	4	16	6	4	2		74
Discrimination in terms, conditions, privileges relating to sale	6	11	8	10	3	12	7	2	4	2	3	68
Discrimination in services and facilities relating to rental	11	9	4	2	4	5	11	8	4	7	2	67
Failure to permit reasonable modification	3	4	6		1	2	5	12	5	4	8	50
False denial or representation of availability - rental	3	3	4	3	5	1	1	6	3	2	6	37
Other discriminatory acts	5	2	8	6	1	2		1	4	3		32
Discriminatory refusal to sell	6	2	3	5	3	1	1	4	2	2	1	30
Discrimination in the terms or conditions for making loans	3	2	1	2	2	1	10	3	3	3		30
Discriminatory refusal to sell and negotiate for sale	1	3	1	2	3	1	2	3	1	4		21
Steering	2	3	1	1	3	2	2	1	1	1	2	19
Non-compliance with design and construction requirements (handicap)	6	4	1					1		3		15
Using ordinances to discriminate in zoning and land use			3	3	1		3		3		1	14
Failure to provide accessible and usable public and common user areas	4				4			1	1	4		14
Refusing to provide municipal services or property		1			2		1			9		13
Discrimination in the selling of residential real property		2		4		1	2		1	2		12
Discrimination in making of loans	3	1		1	2	3			1			11
Discriminatory refusal to negotiate for sale	3		1	1		2				2	1	10
Discriminatory refusal to negotiate for rental	1	1	1	1	1		1	1	1	1	1	10
False denial or representation of availability		1		4					1	3	1	10
Discrimination in terms and conditions of membership		1	1	2	1	3	1	1				10
False denial or representation of availability - sale	1			2			2		1	2		8
Discrimination in the appraising of residential real property	2	2				1	1		1			7
Failure to provide an accessible building entrance		1			1	1		1		3		7
Discriminatory advertisement - rental			1		3				2			6
Failure to provide an accessible route into and thru the covered unit	3							2		1		6
Discrimination in services and facilities relating to sale				1				1	2			4

Adverse action against an employee	1					1	1		1			4
Use of discriminatory indicators		1				2					1	4
Restriction of choices relative to a rental			2		1							3
Failure to provide usable kitchens and bathrooms	1									2		3
Discriminatory acts under Section 901 (Criminal)									1	1	1	3
Discriminatory advertising - sale				1	1							2
Failure to provide usable doors										2		2
Discrimination in the brokering of residential real property							1					1
Discriminatory brokerage service	1											1
Redlining - mortgage							1					1
Restriction of choices relative to a sale											1	1
Other non-compliance with design and construction requirements	1											1
Total Issues	300	209	257	278	318	241	393	333	317	304	290	3,240
Total Complaints	243	172	202	215	250	182	255	235	166	146	129	2,195

Resolved HUD Complaints

Table E.12
Resolved Fair Housing Complaints by Basis
 State of North Carolina
 2004–2014 HUD Data

Basis	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
Disability	32	31	25	27	28	26	34	36	23	20	31	313
Race	22	26	33	24	18	21	45	33	20	15	10	267
National Origin	16	13	14	14	33	8	26	27	29	20	9	209
Family Status	7	13	7	5	5	10	25	24	23	13	11	143
Sex	8	4	6	4	6	10	10	3	8	7	6	72
Retaliation	2			4	1	1	1		2	1	5	17
Religion	1			2		1	2				1	7
Color						1			2	1		4
Total Bases	88	87	85	80	91	78	143	123	107	77	73	1,032
Total Complaints	71	73	66	65	79	58	104	97	78	59	50	800

Table E.13
Resolved Fair Housing Complaints by Issue

State of North Carolina
2004–2014 HUD Data

Issue	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Total
Discrimination in term, conditions or privileges relating to rental	26	26	29	23	34	26	64	49	53	29	25	384
Failure to make reasonable accommodation	13	12	14	14	17	15	19	16	13	9	20	162
Discriminatory terms, conditions, privileges, or services and facilities	12	13	13	11	18	13	11	17	11	18	20	157
Discriminatory refusal to rent	6	4	2	10	5	4	9	11	5	6	4	66
Discriminatory advertising, statements and notices	2			2	5	3	9	7	6	15	15	64
Discriminatory acts under Section 818 (coercion, etc.)	1	9	6	5	5	3	5	5	6	5	12	62
Otherwise deny or make housing available	3			1	1	1	7	2	5	7	10	37
Discrimination in services and facilities relating to rental	5	5	1	1	3	1	4	7	1	5	1	34
Failure to permit reasonable modification	2	1	3		1	2	1	6	4	3	4	27
Discriminatory refusal to rent and negotiate for rental	2			1	2	1	1	2	2	1	3	15
False denial or representation of availability - rental	1	1		2	2	1		3		1	2	13
Discrimination in terms, conditions, privileges relating to sale	1	3	4		1	1	1		1	1		13
Other discriminatory acts	1	1	2	2		2			1	1		10
Discriminatory financing (includes real estate transactions)				1	1		4	1	2			9
Non-compliance with design and construction requirements (handicap)	2	4						1		2		9
Discriminatory refusal to sell	2		2	2								6
Discriminatory refusal to negotiate for rental			1	1				1	1	1		5
Steering	1	1			1						2	5
Failure to provide accessible and usable public and common user areas	3				1					1		5
Discriminatory refusal to sell and negotiate for sale		1	1					1	1			4
Discrimination in terms and conditions of membership		1	1	1	1							4
Failure to provide an accessible building entrance		1			1	1				1		4
Discrimination in making of loans						3						3
Use of discriminatory indicators		1				1					1	3
Failure to provide an accessible route into and thru the covered unit	1							1		1		3
Discriminatory refusal to negotiate for sale	1					1						2
Discriminatory advertisement - rental					1				1			2

False denial or representation of availability				1						1		2
Discrimination in the terms or conditions for making loans						1		1				2
Adverse action against an employee	1					1						2
Using ordinances to discriminate in zoning and land use						1				1		2
Discrimination in the appraising of residential real property								1				1
Discrimination in services and facilities relating to sale								1				1
Restriction of choices relative to a rental				1								1
Refusing to provide municipal services or property		1										1
Failure to provide usable doors									1			1
Other non-compliance with design and construction requirements	1											1
Total Issues	87	85	80	78	100	79	138	130	116	109	120	1,122
Total Complaints	71	73	66	65	79	58	104	97	78	59	50	800

