

**Assessment of Fair Housing
City of Greenville, North Carolina**

DRAFT

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I. Cover Sheet

1. **Submission date:** Oct. 2, 2017
2. **Submitter name:** City of Greenville, N.C.
3. **Type of submission:** Single Program Participant
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5. **For PHAs, Jurisdiction in which the program participant is located:** N/A
6. **Submitter members (if applicable):** N/A
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 - e. **City:** Greenville
 - f. **State:** North Carolina
 - g. **Zip code:** 27858
8. **Period covered by this assessment:** October 2017 – October 2021
9. **Initial, amended, or renewal AFH:** Initial
10. **To the best of its knowledge and belief, the statements and information contained herein are true, accurate, and complete and the program participant has developed this AFH in compliance with the requirements of 24 C.F.R. §§ 5.150-5.180 or comparable replacement regulations of the Department of Housing and Urban Development;**
11. **The program participant will take meaningful actions to further the goals identified in its AFH conducted in accordance with the requirements in §§ 5.150 through 5.180 and 24 C.F.R. §§ 91.225(a)(1), 91.325(a)(1), 91.425(a)(1), 570.487(b)(1), 570.601, 903.7(o), and 903.15(d), as applicable.**

***** (Print Name) (Program Participant/Title)**

Amy Lowe
City of Greenville
Housing Division Administrator

(Signature) (date)

II. Executive Summary

1. **Summarize the fair housing issues, significant contributing factors, and goals. Also include an overview of the process and analysis used to reach the goals.**

Introduction

Known as the capital of East Carolina, Greenville, N.C., is the economic, cultural and educational heart of the region and the seat of Pitt County, located just inland off the Atlantic coast. Historically a leading marketer of tobacco, today the economic drivers are health care, education and manufacturing, with an emphasis on bioscience and robotics. Greenville has big city features – a convention center, art galleries, museums, theaters, a ballet and East Carolina University, which is the third largest university in the state with an enrollment of 28,289 students, including a medical school and 50,000-seat football stadium -but the city also has small town charms with inviting front-porch neighborhoods and more than 20 public parks.

Greenville has twice (2008 and 2010) been named among the nation's "100 Best Communities for Young People" by the America's Promise Alliance. Forbes Magazine ranked Greenville in the top 10 of the nation's "Best Small Places for Business and Careers" in 2012 and 24th in mid-city business growth and development in 2010.

Over the past couple of decades, Greenville has experienced steady growth. According to the most recent American Community Survey, the 2015 population in the city was 88,598 – a 46.5 percent increase since the year 2000 and twice the statewide rate of 22.3 percent.

Greenville-Pitt County serves the largest concentration of people in eastern North Carolina with a population density of 2,365 people per square mile, the highest density of any region on the east side of the state. Greenville-Pitt County is centrally located and has more than 812,000 people within 45 miles.

While the average housing cost in Greenville-Pitt County (Greenville area 2011 - \$194,476) is lower than the state and national averages, and from a strictly quantitative standpoint there are enough housing units to house the population, the problem is the availability of decent affordable housing situated in areas with economic opportunities. Economic growth has led to rising housing costs. As the cost of housing has risen, it has pushed out low-income residents, particularly renters who do not see rising housing costs as an increase in the value of their investment. When income is strongly linked to race or ethnicity this can

lead to racial and ethnic segregation. This is the case in Greenville. Low-income residents gather together along racial and ethnic lines and have been priced out of more affluent areas.

Through the process of this Assessment of Fair Housing, and described in Section V of this report, the following fair housing issues have been identified within the city of Greenville:

1. Segregation
2. Racial and Ethnic Concentrations of Poverty
3. Disparities in Access to Opportunity
4. Disproportionate Housing Needs
5. Publicly Supported Housing Location and Occupancy
6. Disability and Access Issues
7. Fair Housing Enforcement, Outreach Capacity and Resources

For each fair housing issue, the associated contributing factors identified in this assessment are prioritized by degree of impact on the particular fair housing issue – the highest ranking contributing factor thus contributing the most toward the fair housing issue. Overall, the highest priority of all the contributing factors is the location and type of affordable housing, which is overwhelmingly the leading factor contributing to segregation and racial and ethnic concentrations of poverty within the city.

Community opposition and displacement of residents due to economic pressure also contribute to multiple fair housing issues including segregation, racial and ethnic concentrations of poverty as well as disproportionate housing needs. Equally as important, the lack of public investments and the lack of local fair housing enforcement also contribute to multiple fair housing issues.

The city of Greenville has managed to leverage funds from outside federal grants, but the number of projects they create is not enough to meet the needs. Despite focused economic and community development efforts targeting the racially/ethnically-concentrated areas of poverty (R/ECAP) tract in the northwest area of the city, segregation and poverty persist there.

The location and type of affordable housing has deepened segregation in the R/ECAP tract, which has a very high rate of subsidized housing. In 2015, more than 30 percent of the population of the R/ECAP tract received subsidized housing, which is considerably higher than the city average of 4.54 percent. Areas with a high black, non-Hispanic population receive more subsidized housing than other areas of the city and this is contributing to the perpetuation of the R/ECAP.

According to HUD, public housing developments and residents using HCV housing vouchers are almost entirely black households pointing to segregation along racial lines. Access to public housing developments is not dependent on race, but because of location or preference, the developments are predominantly black. This is also true for a few Project-based Section 8 housing sites in the city.

While blacks make up 34.6 percent of households in the city of Greenville, a disproportionate number (41.7 percent) of households in the city with extremely low incomes (0-30 percent AMI) are black. Additionally, 43.5 percent of households that are very low income (0-50 percent AMI) are black. This means black households in the city are more likely to have low incomes as compared to other race groups, which partly explains why a majority of households residing in publicly supported housing are black.

Blacks are over-represented in all public housing categories as compared to the percentage of black households in the city, making up 92.2 percent of the public housing population. On the other hand, Hispanics account for 3 percent of households and Asians for 2.4 percent in the city, yet they have little or no representation in public housing programs. Hispanic and Asian households that meet the income requirements set by HUD for publicly supported housing are not utilizing these programs. As the Hispanic population is one of the fastest-growing communities in Greenville, it is important that they find adequate and affordable housing.

Diverse housing options enhance economic growth. But in Greenville, areas with economic opportunities lack the housing necessary for the workforce, which increases commute times and limits opportunities for low-income individuals. One area especially lacking in Greenville is housing units that are neither large multi-family complexes nor one-unit detached housing. Known as a the “missing middle,” 39.2 percent of housing falls in this category and is significantly higher than the county or state.

Another barrier is the lack of access to high performing schools. This creates roadblocks to student advancement, especially the northwestern areas of the city. Having limited access to high-performing schools is a contributing factor to low college education participation rates, and therefore low education attainment. Educational attainment is directly tied to earnings, which is a key part in income mobility.

According to the 2011-2015 ACS, only 17.4 percent of blacks 25 years and older had a bachelor’s degree or higher. The citywide rate is 38 percent. As of 2015, persons with a bachelor’s degree in Greenville earned \$37,386, while those with only a high school

education earned \$23,414 annually. Disparities in access to opportunities such as high-paying jobs and affordable housing will continue to persist in this community.

Another factor contributing to the deficiency of housing opportunities is the lack of private investment in specific neighborhoods, particularly in the northwest and western area of Greenville, compared to the rest of the city. While not a perfect indicator of a lack in private investment in an area, this part of the city has several areas with a very high percentage of business vacancies in commercial business locations.

According to the 2011-2015 ACS, 28.2 percent of homeowners with a mortgage and 59.4 percent of renters are cost burdened (spending more than 30 percent of income on housing costs), pointing to a major disconnect between the housing supply and residents' income. In addition to black families, the elderly and persons with disabilities are more likely to be cost burdened. Those with disabilities often face the added difficulty of purchasing homes that must be brought up to applicable state and local or Americans with Disabilities Act (ADA) codes, which adds to the cost of purchasing or owning a home.

Persons with a disability earn 17.5 percent less than those without (\$15,856 median income versus \$19,215). Approximately 28.2 percent of homeowners with a mortgage in the Greenville are already cost burdened, and cost burden generally increases as median income decreases. Persons with a disability have more limited options for homeownership in the city than non-disabled persons.

The city provides a grievance procedure to meet the requirements of the ADA. Written complaints detailing the circumstance can be filed with the ADA coordinator.

Affirmatively Furthering Fair Housing

Fair housing has long been an important issue in American urban policy – a problem born in discrimination and fueled by growing civil unrest that reached a boiling point during the Civil Rights Movement. The passing of the Fair Housing Act in 1968 was a critical step toward addressing this complex problem, but it was far from a solution. Since passage of the act, community groups, private business, concerned citizens and government agencies at all levels have worked earnestly at battling housing discrimination. The Fair Housing Act mandates that the Department of Housing and Urban Development (HUD) “affirmatively further fair housing” through its programs. Toward this end, HUD requires funding recipients to undertake fair housing planning (FHP) in order proactively to take steps that will lead to less discriminatory housing markets and better living conditions for minority groups and vulnerable populations. Until recently, the Analysis of Impediments to Fair

Housing Choice was the primary component of HUD's fair housing efforts.

On July 16, 2015, HUD published its final rule on affirmatively furthering fair housing (AFFH). Three weeks earlier the U.S. Supreme Court upheld the distinct but related concept of disparate impact liability (*Texas Department of Housing and Community Affairs v. Inclusive Communities Project*).

The procedural aspects of the rule are new, but the fundamental concept is not: the requirement to affirmatively further fair housing is a key provision of the Fair Housing Act, as codified in Title VIII of the Civil Rights Act of 1968 (42 U.S.C. 3608). As a condition of accepting HOME Investment Partnerships Program funding, Community Development Block Grants (CDBG), McKinney-Vento Homeless Assistance Grants and public housing subsidies, agencies must undertake "meaningful actions . . . that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics." ¹

The AFFH final rule replaces the existing requirement to conduct an analysis of impediments to fair housing (AI) with that of a new study, the Assessment of Fair Housing (AFH). The new AFH provides grantees with a uniform template, firmer guidance from HUD, and a host of data and mapping tools to assist them in their fair housing analysis.

The final rule states that a jurisdiction's "meaningful actions" must:

- Address significant disparities in housing needs and access to opportunity;
- Replace segregation with truly integrated and balanced living patterns; and
- Transform racially/ethnically concentrated areas of poverty into areas of opportunity.

There is no federal expectation for specific outcomes. Instead, agencies have to carefully and thoughtfully carry out the new process.

As a part of this new approach under the AFH, the city of Greenville will take a balanced approach to ensure these four goals are met for its residents:

1. Reduce segregation
2. Eliminate racially/ethnically concentrated areas of poverty (R/ECAP)

¹ Affirmatively Furthering Fair Housing: Final Rule. *Federal Register Vol. 80 No. 136*, July 16, 2015.
<https://www.gpo.gov/fdsys/pkg/FR-2015-07-16/pdf/2015-17032.pdf>

3. Reduce disparities in access
4. Reduce disproportionate housing needs for protected classes

It is the goal of this new assessment to take the next step in community planning regarding fair housing issues in the city.

Methodology/Overview of Process

The Assessment of Fair Housing Tool is broken down into four parts:

1. Community participation process;
2. Assessment of past goals and actions to reduce disparities in access;
3. Fair housing analysis, which includes a demographic summary, general issues, Public Housing Authority (PHA) analysis, disability access analysis and analysis of fair housing complaints, discrimination and segregation patterns.
4. Fair housing goals and priorities

Within these sections, the assessment consists of a comprehensive review of laws, regulations, policies and practices affecting housing affordability, accessibility, availability and choice within the city of Greenville. The assessment specifically includes an evaluation of:

- Existing socio-economic conditions and trends in the area, with a particular focus on those that affect housing and special needs populations;
- Public and private organizations that impact housing issues in the city and their practices, policies, regulations and insights relative to fair housing choice;
- The range of impediments to fair housing choice that exist within both the urban center communities and other areas of the city;
- Specific recommendations and activities for the city to address any real or perceived impediments; and
- Effective measurement tools and reporting mechanisms to assess progress in meeting fair housing goals and eliminating barriers to fair housing choice in the city.

The planning process was launched with a comprehensive review of existing studies for information and data relevant to housing need and related issues. These documents

included local comprehensive plans and ordinances, the Housing Division's Consolidated Plan for the city, and other policy documents. Additional service provider data and observations were incorporated to include qualitative and quantitative information on special needs populations.

An assessment of fair housing was also made for publicly supported housing and the PHA in the city.

The primary data used in this assessment was HUD-provided-data specific to the AFH. During the development of the AFH, HUD announced changes to the AFH Data and Mapping tool and the AFH User Interface on July 19, 2017, which updated the demographic data and opportunity indexes in the data and the boundaries of racial and/or ethnically concentrated areas of poverty (R/ECAP) and indicators in the Geographic Information System (GIS) maps. This AFH reflects the updates made by HUD.

Additional data obtained for the AFH from other sources were U.S. Census reports, the American Community Survey, the Home Mortgage Disclosure Act (HMDA), the Housing Authority of the City of Greenville, GreatSchools, Valassis Lists, and American Community Survey/Census GIS maps via PolicyMap.

Fair Housing Issues

HUD has recognized seven key areas in Fair Housing Issues for the AFH. They are:

- 1) Segregation
- 2) Racial and ethnic concentrations of poverty
- 3) Disparities in access to opportunity
- 4) Disproportionate housing needs
- 5) Publicly supported housing location and occupancy
- 6) Disability and access issues
- 7) Fair Housing enforcement, outreach capacity and resources

Significant Contributing Factors

Each of the seven fair housing issues as listed in the AFH has contributing factors that exist. Contributing factors to the fair housing issues are ranked by prevalence.

Contributing Factors of Segregation

1. Location and type of affordable housing
2. Community opposition
3. Displacement of residents due to economic pressures

Contributing Factors of R/ECAPs

1. Displacement of residents due to economic pressures
2. Location and type of affordable housing

Contributing Factors of Disparities in Access to Opportunity

1. The availability, type, frequency and reliability of public transportation
2. Location of employers
3. Location and type of affordable housing

Contributing Factors of Disproportionate Housing Needs

1. The availability of affordable units in a range of sizes
2. Displacement of residents due to economic pressures

Contributing Factors of Publicly Supported Housing Location and Occupancy

1. Admissions and occupancy policies and procedures, including preferences in publicly supported housing
2. Impediments to mobility
3. Lack of meaningful language access
4. Lack of private investment in specific neighborhoods
5. Quality of affordable housing information programs

Disability and Access Issues Contributing Factors

1. Access to publicly supported housing for persons with disabilities
2. Lack of affordable, integrated housing for individuals who need supportive services
3. Lack of assistance for housing accessibility modifications
4. Location of accessible housing
5. Loss of affordable housing

Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

1. Lack of resources for fair housing agencies and organizations

Goals

The following five goals were developed as a result of this AFH:

1. Increase Access to Affordable Housing
2. Reduce Substandard Housing
3. Increase Employment Training and Employment Opportunities
4. Increase Economic Development Activities & Investments
5. Increase Fair Housing Awareness and Education

III. Community Participation Process

1. Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AFH process, including the types of outreach activities and dates of public hearings or meetings. Identify media outlets used and include a description of efforts made to reach the public, including those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as R/ECAPs, persons who are limited English proficient (LEP), and persons with disabilities. Briefly explain how these communications were designed to reach the broadest audience possible. For PHAs, identify your meetings with the Resident Advisory Board and other resident outreach.

In order to gather the greatest number of viewpoints about the issues affecting the community, the City of Greenville conducted several meetings with community leaders and the general public. The city worked with local organizations to advertise the events and encourage participation from underrepresented groups.

Community Outreach Meeting #1

On August 8, 2017 at 9:30 am, the City of Greenville held a public meeting to discuss furthering fair housing in Greenville. This meeting was held in City Hall. Approximately thirty members of the community attended the meeting, which included a presentation and Q&A period. Additionally, local media was present to record the event. Issues discussed included public housing, homeownership, rental rates, landlord behavior, and other housing issues.

Interdepartmental Roundtable

On August 8, 2017 at 2:00 pm, leaders in the City of Greenville held a roundtable discussion to discuss AFH Goals. Included in this meeting were experts in zoning, fair housing education, compliance, home construction, financial literacy education, media outreach, economic development, and a neighborhood liaison.

Community Outreach Meeting #2

On August 8, 2017 at 6:00 pm, consultants for the City of Greenville held a public meeting to discuss furthering fair housing in Greenville. This meeting was held at the Lucille W. Gorham Intergenerational Community Center which is located in a R/ECAP tract. Government officials were not present in order to encourage honest and direct feedback from the community. Approximately ten residents attended this meeting.

Public Hearing

Scheduled: September 14

Assessment of Fair Housing 30-Day Public Comment Period:

Greenville made the City's Assessment of Fair Housing available to the public from August 14, 2017 to September 13, 2017

2. Provide a list of organizations consulted during the community participation process.

City of Greenville Community Development Department, City of Greenville Economic Development Division, City of Greenville Planning Division, North Carolina Department of Health and Human Service, and NC Housing Coalition.

3. Describe whether the outreach activities elicited broad community participation during the development of the AFH. If there was low participation, or low participation among particular protected class groups, what additional steps might improve or increase community participation in the future, including overall participation or among specific protected class groups?

Efforts to elicit meaningful communication were successful. There was sufficient input from a diverse group of citizens and community leaders. Meaningful insight was obtained – this insight informed the content of the plan and aided city staff in developing goals.

4. Summarize all comments obtained in the community participation process. Include a summary of any comments or views not accepted and the reasons why.

Meetings:

Community Outreach Meeting #1 – The following is a summary of the key points that arose during the first community outreach meeting on August 8. A complete list of comments is available in the appendix.

- What type of data is collected and compared in the AFH?
 - Transition from public housing to homeownership
 - Comparisons with similar communities, particularly other college towns
 - Cost burdens across different communities
- Segregation
 - Glaring segregation lines along the railroad track
 - Families lack the money to leave low-income communities, housing is segregated
 - Program changes are needed to encourage affordable housing in strategic areas and encourage rehabilitation
- Rental Issues
 - Increasing quickly
 - Lack of housing stock for some income categories
 - Renters in substandard housing because there are no other options
 - Landlords often require double deposits, a \$50 application fee, and charge for a background check, which all prohibits low-income families from finding housing and leads to homelessness and other instability
 - Legal and illegal discrimination is present in the community

- Outreach
 - More effort is needed to educate residents about financial literacy
 - Landlords and renters need more information about their rights

Interdepartmental Meeting – The following is a summary of the interdepartmental meeting held by the City of Greenville on August 8. A complete list of comments is available in the appendix.

- Zoning
 - Currently no affordable housing incentives
 - All multifamily buildings, whether it has four units or forty units, are viewed the same
- Increased Capacity
 - City needs greater code enforcement
 - City needs a stronger mediation program
- Five Goals Prioritized
 - Increase affordable housing access
 - Reduce Substandard Housing
 - Increase Employment Training and Employment Opportunities
 - Increase Economic Development Activities and Investments.
 - Increase Fair Housing Awareness and Education

Community Outreach Meeting #2 – The following is a summary of the key points that arose during the second community outreach meeting on August 8. A complete list of comments is available in the appendix.

- Home Ownership
 - City is not assisting with rehabilitation like it should be
 - It is difficult for many people to get a loan, even when they meet all the credit requirements. There is a perception of discrimination.
 - The city does not seem to be encouraging affordable housing
- R/ECAP Tracts
 - Lack home ownership opportunities
 - Lack necessary training to increase economic opportunities
- City Programs
 - Residents perceive the City and County are unhelpful and give residents “the run around”
 - “Housing First” program is needed to help with the homeless populations
 - Financial education is needed in minority communities

Public Hearing (TBD)

IV. Assessment of Past Goals, Actions and Strategies

1. Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents:

a. Discuss what progress has been made toward the achievement of fair housing goals.

The city of Greenville identified five impediments to fair housing in its 2013 Analysis of Impediments to Fair Housing Choice. They were:

- **Impediment 1:** Lack of affordable housing forces the lower income population to find alternative housing.
- **Impediment 2:** Lack of education about discrimination and fair housing laws in Greenville result in citizens who are unaware of rights or where to report violations and lenders who may not be knowledgeable about fair housing practices.
- **Impediment 3:** Substandard housing and low property maintenance contribute to the lack of safe, decent, and sanitary affordable housing.
- **Impediment 4:** Limited housing opportunities exist for the homeless, those who are at risk of homelessness, and special needs populations.
- **Impediment 5:** Lack of access to homeownership (based on HMDA and apparent predatory lending practices) limit housing choices.

Progress over the last five years was recorded annually through the Consolidated Annual Performance and Evaluation Report. The city of Greenville has continually worked at addressing the identified impediments through its planning efforts and has targeted specific areas and groups within the city with the highest need according to the Consolidated Plan Priorities.

For Impediment 1, the city mainly targeted the West Greenville Redevelopment Area with new single-family housing construction. The boundaries of this area are the Tar River to the north, Greene Street to the east, Tenth Street Connector to the south, and Memorial Drive to the west. Other activities that help to make housing affordable in the redevelopment area and across the city are the owner-occupied and rental housing rehabilitation efforts to help with maintaining homes in the city, property acquisition of dilapidated and blighted homes for the purpose of removal, tenant displacement and relocation, and the down payment assistance programs which helps with down payment funds for first-time low- and moderate-income homebuyers from federal and locally

funded sources. From 2011 to 2016, the city constructed 10 new single-family homes and also sold another four. In the same time period, 28 first-time low- and moderate-income families utilized the down-payment assistance program.

The city will continue to partner with nonprofits to build affordable units for homeownership or lease/purchase options.

For Impediment 2, the city is working continually to educate its citizens about fair housing laws and anti-discrimination rights. In 2013 the city released the 2013 Analysis of Impediments to Fair Housing Choice (AI), which was an analysis of fair housing in Greenville, identifying the five most pressing impediments for fair housing in the city. The AI brought together all the city's stakeholders seeking to further fair housing and produced a plan of action for each impediment. The city also continues to market fair housing strategies through advertisements in the local newspapers, social media, various community events, nonprofits and other media. Education of Fair Housing laws occurs throughout the year, but peaks during the month of April, which has been designated as "Fair Housing Month" in Greenville. Finally, efforts to affirmatively further fair housing in the city are handled by the human relations coordinator who can address landlord/tenant issues, provide emergency housing assistance and coordinates outreach. This staff member also serves as a liaison to the Greenville Humans Relation Council, which is responsible for advocating for education programs that enhance relationships, equal opportunity, mutual respect and harmony in the city. The city has also added fair housing presentation to the Homebuyer Education program. The community relations officer from Community Development Department facilitates the session.

For Impediment 3, substandard housing is addressed through the owner-occupied and rental housing rehabilitation efforts in the city. From 2011 to 2016, 65 owner-occupied homes were rehabilitated through the HOME program. Rehabilitation for owner-occupied housing was for low- and moderate-income households and helped rehab substandard dwellings for single-family homes. In 2011 and 2012, after rehabilitation of Winslow Pointe, a multi-family development with 84 rental housing units was made available to low- and moderate-income households as well.

Property was acquired in order to remove dilapidated structures and construct new affordable housing in the city. From 2011 to 2016, 21 dilapidated properties were acquired by the city to eliminate blighted conditions.

The city has now implemented an Energy Efficiency Program and Urgent Repair Program

for owner occupied homes as part of the Owner-Occupied Rehabilitation Program. The city now has a partnership with the State Employee's Credit Union to rehabilitate or build new single-family rentals or duplexes.

For Impediment 4, the city continues to support programs that increase self-sufficiency for homeless and at-risk special needs populations in Greenville. In 2016, the PIT Count was nine households with children and 78 without minor children. The city of Greenville is a member of the North Carolina Balance of State Continuum of Care (CoC) and meets with the CoC monthly to discuss issues affecting the homeless population in the city and the region and to develop ongoing strategies to provide assistance to this group.

The city, along with the Pitt County Board of Commissioners, also adopted resolutions in 2007 to develop a 10-year plan to end chronic homelessness in Pitt County. Financial assistance through the CDBG program was provided to the Center of Family Violence Prevention, which provides emergency housing to battered women and young children. Transitional housing was also provided through the center and is designed to be a bridge from homelessness to self-sufficient permanent housing.

In 2016, the city as a member of the Pitt County CoC and the Housing Authority of the City of Greenville (HACG) assisted 40 individuals with HIV/AIDS with housing opportunities using Housing Opportunities for Persons with AIDS (HOPWA) funds. Currently, HACG manages 10 units designated for HIV/AIDS individuals. Case management services are provided in partnership with the Pitt County AIDS Service Organization.

Finally, the Greenville Police Department and L.I.F.E. of NC, Inc. DBA STRIVE have collaborated together to implement a prisoner re-entry program in the city of Greenville. This program was made possible through a grant funded by the North Carolina Governor's Crime Commission.

For Impediment 5, to address the lack of access to homeownership (based on HMDA and apparent predatory lending practices), the city's efforts were focused on educating potential homebuyers. The city conducted property manager seminars that were attended by 68 individuals. All first-time homebuyers in the city are required to attend a workshop for Fair Housing Education. Also, additional workshops on fair housing, lending practices and access were scheduled throughout the program year and are ongoing. In the past three years alone, there have been more than 250 participants at these workshops.

b. Discuss how successful in achieving past goals, and/or how it has fallen short of achieving those goals (including potentially harmful unintended consequences).

Greenville's Housing Division consistently evaluates the CDBG and HOME programs for efficiency and regularly updates the requirements and procedures as needed on an annual basis.

Some highlights of success are the demolition of substandard and abandoned properties, which have improved the living conditions of low- and moderate-income neighborhoods. The majority of new rental properties in the city are now at or near market rates.

In the past five years, the CDBG program has recorded no failures. Activities of the program are accomplished in accordance with following National Objectives of the funding. There is also no record of Greenville experiencing potentially harmful unintended consequences as a result of the actions taken by the city to address furthering fair housing within its limits. Even with the limited funding available, the city has addressed all of the goals set forth by its plans. To assist in successfully achieving these goals, Greenville leveraged funds from federal funds and a variety of other sources.

There are, however, some areas where the city sees a need for improvement. The tax credit properties in Greenville offer lower-cost rental units, but it still leaves out families caught in the middle 50-80 percent median income brackets and large families. Families of five or more have a limited selection to choose from due to a shortage of housing stock large enough to accommodate their needs. Finally, the city recognizes the need for new rental construction that serves a diversity of renters. Over the past two years, the city has mostly targeted the student population.

c. Discuss any additional policies, actions, or steps that the program participant could take to achieve past goals, or mitigate the problems it has experienced.

Recent and past plans did not address important AFFH measures such as racial and/or ethnically concentrated areas of poverty (R/ECAP) tracts, opportunity indicators or dissimilarity indices. These measures help specify locations and beneficiaries and help provide solutions for affirmatively furthering fair housing within the city limits. In the past, the city has prioritized the West Greenville Redevelopment Area (Census Tract 37137000701), which traditionally has been an area where there is a high population of minority blacks and also an area of where poverty is high in the city. In 2000, the West Greenville Redevelopment Area was established in census tract 37147000701, which was

the only R/ECAP tract in the city at that time. The city of Greenville can adopt HUD's new measures of R/ECAP tracts, opportunity indicators and dissimilarity indexes to align more closely to HUD's fair housing measures.

The Rental Rehabilitation Program has been instrumental in the maintenance of multi-family rental units in the city, however, there is a need to implement this program for single-family homes and duplexes.

A creation of a rental registry for properties would be beneficial for properties that meet minimum housing standards and have been made lead safe. This would help the City with maintaining records and also be integral for residents as they seek or live in their homes.

Currently, fair housing seminars are sponsored by the city annually in April as part of the Fair Housing Month activities. These kinds of educational outreach programs need to be expanded in terms of frequency and audience. Additional outreach efforts should be directed to landlords and property managers as well as residents and potential residents.

d. Discuss how the experience of program participant(s) with past goals has influenced the selection of current goals.

Over the last five-year planning period, the city of Greenville has continually added and rehabilitated many affordable housing units, which contribute greatly to the affordability of housing in the city. The demand for affordable housing continues to outpace supply, a condition exacerbated by a growing population of low-income individuals and families complicated by rising housing costs, adding to the housing cost burden.

In past plans, the city identified the West Greenville Redevelopment Area (Census Tract 37137000701) as an area that has a high need for affordable housing. The majority of northwest Greenville has experienced higher levels of poverty than the rest of the city. R/ECAP tracts have persisted over several decades, which indicates the need to both improve conditions for residents and strategically to create affordable housing options elsewhere. The former can be addressed by improved transit, school supportive services and job training. The latter will result from increased development.

V. Fair Housing Analysis

A. Demographic Summary

1. Describe demographic patterns in the jurisdiction and region, and describe trends over time (since 1990).

Racial/Ethnic Populations

Greenville is in the east-central portion of North Carolina and is the principal city for the Greenville Metropolitan Statistical Area (MSA) contained in Pitt County. When reference is made to the region or the jurisdiction in this report it pertains to the MSA. The racial and ethnic demographics of Greenville are similar to the rest of the region. The white, non-Hispanic population makes up the majority in the city at 55.85 percent, which is close to the regional white, non-Hispanic population of 57.12 percent. The Hispanic population in Greenville is slightly lower than the region, 4.02 percent and 5.47 percent, respectively. The black, non-Hispanic population is the second largest racial group at 35.65 percent in Greenville and 33.79 percent in the region as a whole. The following table shows the racial and ethnic demographics for the jurisdiction and the region.

Race/Ethnicity	Jurisdiction: Greenville		Region: Greenville MSA	
	#	%	#	%
White, Non-Hispanic	47,354	55.85%	96,038	57.12%
Black, Non-Hispanic	30,227	35.65%	56,813	33.79%
Hispanic	3,408	4.02%	9,202	5.47%
Asian or Pacific Islander, Non-Hispanic	1,909	2.25%	2,632	1.57%
Native American, Non-Hispanic	247	0.29%	474	0.28%
Two or More Races, Non-Hispanic	1,492	1.76%	2,699	1.61%
Other, Non-Hispanic	144	0.17%	290	0.17%
Source: Decennial Census, 2010				

Since 1990, Greenville has undergone a slight demographic shift. The white, non-Hispanic population increased from 35,292 persons to 47,354, but, despite the growth, the percentage of the population that identify as white, non-Hispanic reduced from 66.22 percent to 55.85 percent. During that same period, the black, non-Hispanic population grew from 16,826 in 1990 to 30,227, or an increase from 31.55 percent to 35.65 percent. The Hispanic population has grown by nearly eight-fold since 1990 from 460 to 3,408, making them the third most populous ethnic group in the city. The Asian or Pacific Island

population nearly quadrupled from 559 to 1,909.

The overall region has undergone similar shifts in racial and ethnic demographics since 1990. The white, non-Hispanic population has grown from 70,198 to 96,038, but this growth has not matched overall population growth and the white population representation has shrunk from 65.04 percent to 57.12 percent. The black, non-Hispanic population grew from 35,796 in 1990 to 56,813. The Hispanic population had the highest rate of growth from 184 (or 0.17 percent of the population) to 9,202 (5.47 percent). The following table shows the racial and demographic trends for the jurisdiction and the region.

Table: Racial and Demographic Trends								
Race/Ethnicity	Jurisdiction: Greenville							
	1990 Trend		2000 Trend		2010 Trend		Current	
	#	%	#	%	#	%	#	%
White, Non-Hispanic	35,320	66.22%	41,509	61.84%	47,354	55.85%	47,354	55.85%
Black, Non-Hispanic	16,826	31.55%	22,273	33.18%	31,139	36.73%	30,227	35.65%
Hispanic	460	0.86%	1,479	2.20%	3,408	4.02%	3,408	4.02%
Asian or Pacific Islander, Non-Hispanic	559	1.05%	1,315	1.96%	2,301	2.71%	1,909	2.25%
Native American, Non-Hispanic	110	0.21%	270	0.40%	401	0.47%	247	0.29%
Race/Ethnicity	Region: Greenville MSA							
	1990 Trend		2000 Trend		2010 Trend		Current	
	#	%	#	%	#	%	#	%
White, Non-Hispanic	70,198	65.04%	81,605	60.99%	96,038	57.12%	96,038	57.12%
Black, Non-Hispanic	35,796	33.16%	45,352	33.89%	58,527	34.81%	56,813	33.79%
Hispanic	184	0.17%	492	0.37%	9,202	5.47%	9,202	5.47%
Asian or Pacific Islander, Non-Hispanic	676	0.63%	1,721	1.29%	3,243	1.93%	2,632	1.57%
Native American, Non-Hispanic	961	0.89%	4,208	3.14%	794	0.47%	474	0.28%
Source: Decennial Census, 2010, Brown Longitudinal Tract Database based on decennial census data 2000 and 1990, American Community Survey 2009-2013								

National Origin Populations

Greenville has seen a large increase in the foreign-born population in the past few decades. In 1990, only 1.64 percent (872 people) were born outside of the United States, but currently 5.13 percent (4,345 people) are foreign-born. The region saw similar growth rate in the foreign-born population from 1.22 percent (1,322 people) to 4.89 percent (8,226 people). The following table displays the trends in foreign-born population in the jurisdiction and region.

Table: Foreign-Born Population trends										
Jurisdiction: Greenville										
		1990 Trend		2000 Trend		2010 Trend		Current		
		#	%	#	%	#	%	#	%	
Foreign-Born		872	1.64%	2,688	4.00%	3,611	4.26%	4,345	5.13%	
Region: Greenville MSA										
		1990 Trend		2000 Trend		2010 Trend		Current		
		#	%	#	%	#	%	#	%	
Foreign-Born		1,322	1.22%	4,880	3.65%	7,774	4.62%	8,226	4.89%	
Source: Decennial Census, 2010, Brown Longitudinal Tract Database based on decennial census data 2000 and 1990, American Community Survey 2009-2013										

The most common country of origin for Greenville residents born outside the United States is India at 0.76 percent of the population. The second most common place of birth for the Greenville population is Mexico at 0.40 percent. The remainder of the countries of national origin make up less than 0.33 percent of the population each and include El Salvador, China (excluding Hong Kong & Taiwan), Korea, Canada, Taiwan, Egypt, Japan, and Guatemala. The Greenville region has a relatively large Mexican population making up nearly 1.84 percent of the total residency, or 2,934 people. The second most common country of origin for the region as a whole with 0.43 percent of the population is India. Canada, El Salvador, Korea, China (excluding Hong Kong & Taiwan), Japan, Philippines, Egypt and Taiwan make up the rest of the top 10 countries of origin for the region. The following table displays the national origin for the foreign-born population.

Table: National Origin						
	Jurisdiction: Greenville			Region: Greenville MSA		
		#	%		#	%
#1 country of origin	India	621	0.76%	Mexico	2,934	1.84%
#2 country of origin	Mexico	324	0.40%	India	686	0.43%
#3 country of origin	El Salvador	268	0.33%	Canada	369	0.23%
#4 country of origin	China*	231	0.28%	El Salvador	279	0.18%
#5 country of origin	Korea	225	0.28%	Korea	243	0.15%
#6 country of origin	Canada	182	0.22%	China*	231	0.14%
#7 country of origin	Taiwan	153	0.19%	Japan	222	0.14%
#8 country of origin	Egypt	146	0.18%	Philippines	183	0.11%
#9 country of origin	Japan	136	0.17%	Egypt	174	0.11%
#10 country of origin	Guatemala	135	0.17%	Taiwan	153	0.10%

Source: Decennial Census, 2010, American Community Survey 2009-2013
 * Excluding Hong Kong & Taiwan

Limited English Proficiencies

There is often a strong correlation between the size of foreign-born populations and the number of residents with limited-English proficiency (LEP), which requires agencies in the region to provide translators and services in a variety of languages. In Greenville, the percentage of the population that has LEP increased from 1.03 percent in 1990 to 2.11 percent. In total, more than 750 persons in city have LEP. There was similar growth in the region. In 1990, 1.07 percent of the population had LEP, but that increased to 2.64 percent. In the region, 4,438 people have LEP. The following table displays trends in LEP.

Table: Limited-English Proficiency Trends								
	Jurisdiction: Greenville							
	1990 Trend		2000 Trend		2010 Trend		Current	
	#	%	#	%	#	%	#	%
LEP	550	1.03%	1,457	2.17%	1,396	1.65%	1,786	2.11%
	Region: Greenville MSA							
	1990 Trend		2000 Trend		2010 Trend		Current	
	#	%	#	%	#	%	#	%
LEP	1,155	1.07%	3,258	2.44%	4,192	2.49%	4,438	2.64%

Source: Decennial Census, 2010, 2000, and 1990, American Community Survey 2009-2013

Spanish is the most common language for individuals with LEP in both Greenville and the region. The rate of LEP for Spanish speakers in Greenville is 0.80 percent, which is significantly less than the region 2.06 percent. This is a result of the considerably smaller Mexican-born population in Greenville versus the region. The second most common primary language classification for LEP individuals in Greenville is Chinese and is applicable to 0.31 percent of the population. All other languages represent less than 0.15 percent of the population. The following table displays LEP in the jurisdiction and region.

	Jurisdiction: Greenville			Region: Greenville MSA		
		#	%		#	%
#1 LEP Language	Spanish	649	0.80%	Spanish	3,282	2.06%
#2 LEP Language	Chinese	251	0.31%	Chinese	251	0.16%
#3 LEP Language	Arabic	116	0.14%	Arabic	116	0.07%
#4 LEP Language	Vietnamese	94	0.12%	Portuguese	108	0.07%
#5 LEP Language	Portuguese	81	0.10%	Vietnamese	108	0.07%
#6 LEP Language	Korean	69	0.08%	French	105	0.07%
#7 LEP Language	French	65	0.08%	Japanese	100	0.06%
#8 LEP Language	Persian	47	0.06%	Korean	69	0.04%
#9 LEP Language	Japanese	39	0.05%	Persian	62	0.04%
#10 LEP Language	German	37	0.05%	German	37	0.02%

Source: Decennial Census, 2010, 2000, and 1990, American Community Survey 2009-2013

Individuals with Disabilities by Disability Type

Greenville shows lower rates of disability than the region across all types. An ambulatory difficulty is the most common disability with 5.53 percent of Greenville and 7.10 percent of the region’s population experiencing one or more. Cognitive difficulty is the second most common disability with 4.57 percent in the city and 5.20 percent in the region, followed by an independent living difficulty with 3.54 percent of the city and 4.57 percent of the region. The following table displays the presence of disabilities by type within the jurisdiction and region.

Table: Disability Type				
	Jurisdiction: Greenville		Region: Greenville MSA	
	#	%	#	%
Hearing Difficulty	1,751	2.17%	4,439	2.81%
Vision Difficulty	1,719	2.13%	3,843	2.43%
Cognitive Difficulty	3,684	4.57%	8,207	5.20%
Ambulatory Difficulty	4,460	5.53%	11,207	7.10%
Self-Care Difficulty	1,940	2.41%	4,674	2.96%
Independent Living Difficulty	2,854	3.54%	7,225	4.57%
Source: American Community Survey 2009-2013				

Families with Children

In Greenville, there are 8,351 families with children, which is 47.87 percent of all families in city. The demographics in the Greenville MSA region are slightly lower: 46.65 percent (18,503 total). Communities that have a high level of families with children have special needs, including public transportation, high quality education and economic opportunities nearby.

Since 1990, the percentage of families with children has remained relatively stable in both the jurisdiction and the region, increasing less than 0.1 percent in the city and decreasing 2 percent in the jurisdiction. The following table displays trends in family type in Greenville.

Table: Families with Children								
	Jurisdiction: Greenville							
	1990 Trend		2000 Trend		2010 Trend		Current	
	#	%	#	%	#	%	#	%
Families with Children	5,392	47.78%	4,385	48.20%	8,351	47.78%	8,351	47.87%
	Region: Greenville MSA							
	1990 Trend		2000 Trend		2010 Trend		Current	
	#	%	#	%	#	%	#	%
Families with Children	12,912	48.67%	11,006	48.13%	18,503	46.65%	18,503	46.65%
Source: Decennial Census, 2010, 2000, and 1990, American Community Survey 2009-2013								

B. General Issues

I. Segregation/Integration

1. Analysis

a. **Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.**

The segregation levels in a jurisdiction can be quantified using Racial/Ethnic Dissimilarity Trends. According to HUD, “[t]his dissimilarity index measures the degree to which two groups are evenly distributed across a geographic area and is commonly used for assessing residential segregation between two groups. Values range from 0 to 100, where higher numbers indicate a higher degree of segregation between the two groups measured. Dissimilarity index values between 0 and 39 generally indicate low segregation, values between 40 and 54 generally indicate moderate segregation, and values between 55 and 100 generally indicate a high level of segregation.”

Currently, Greenville has generally moderate and low levels of segregation throughout the city, depending on the groups being compared. The highest value in Greenville is between black and white populations with an index score of 49.69. The lowest index score is between the Asian or Pacific Islander and white populations with a score of 21.68. The Greenville MSA Region has less variance between index scores. In the region, the highest index score is between black and white populations with a score of 42.00 and the lowest index score is between Asian or Pacific Islander and white population with a score of 34.21. The following table displays the racial/ethnic dissimilarity trends in the jurisdiction and the region.

	Jurisdiction: Greenville			
	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	42.69	33.21	30.59	45.45
Black/White	44.79	35.75	33.10	49.69
Hispanic/White	22.71	30.04	30.99	33.67
Asian or Pacific Islander/White	32.75	23.79	21.43	21.68
	Region: Greenville MSA			
	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	38.20	30.54	28.36	38.67
Black/White	40.08	32.82	30.65	42.00
Hispanic/White	22.66	27.45	28.14	35.35
Asian or Pacific Islander/White	38.06	29.19	27.44	34.21

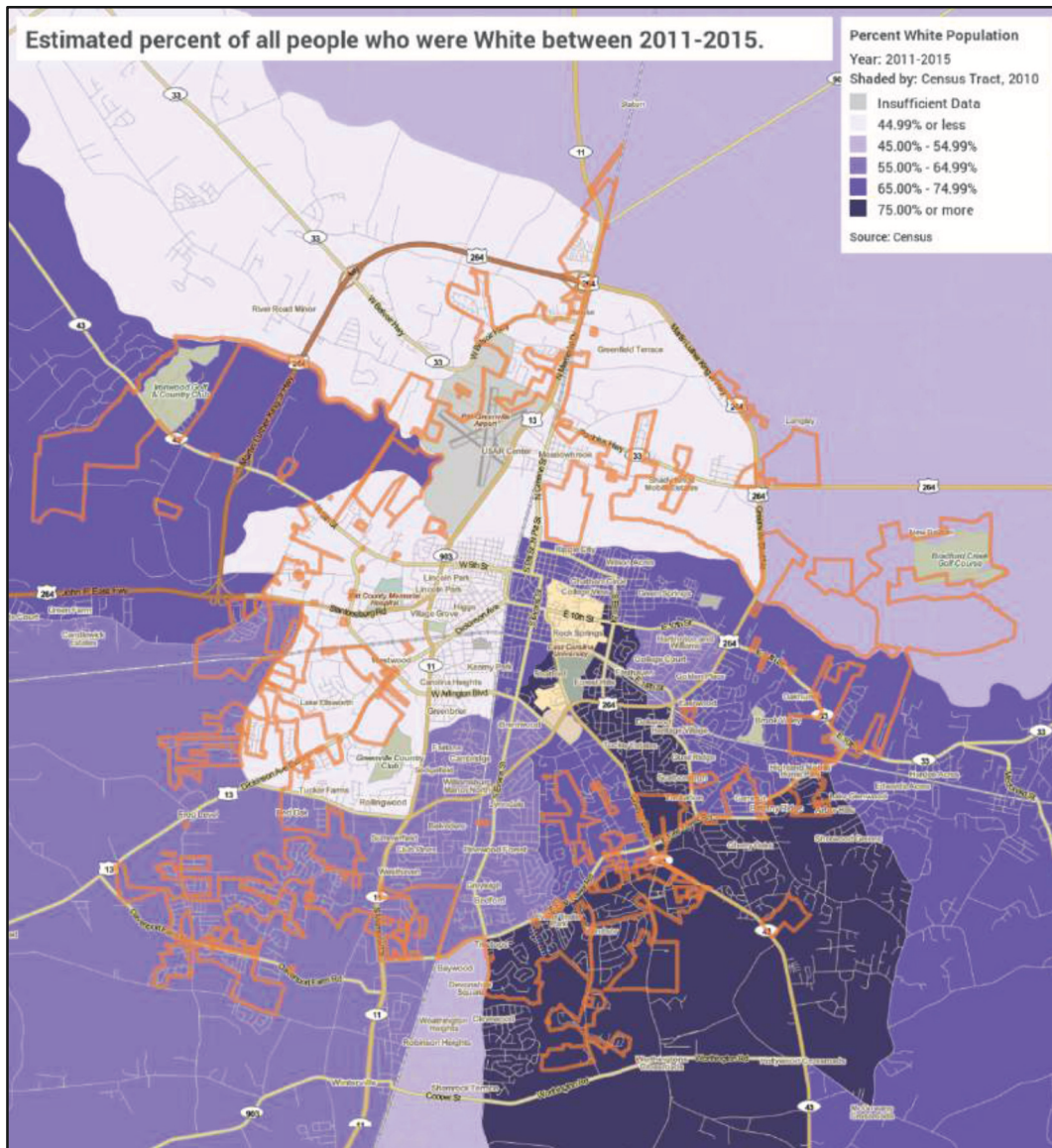
Source: Decennial Census, 2010; Brown Longitudinal Tract Database based on decennial census data, 2010, 2000, and 1990

- b. **Identify areas in the jurisdiction and region with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.**

Race/Ethnicity

Greenville is more segregated than the rest of the region. Relative segregation for an area is determined by the presence of a group compared to their overall representation in the city. For example, if 20 percent of the city's population is a particular group but make up 50 percent of a particular area, that area would be relatively segregated. In this section, data from the 2011-2015 American Community Survey 5-Year Estimates was used because it is the most recent data available.

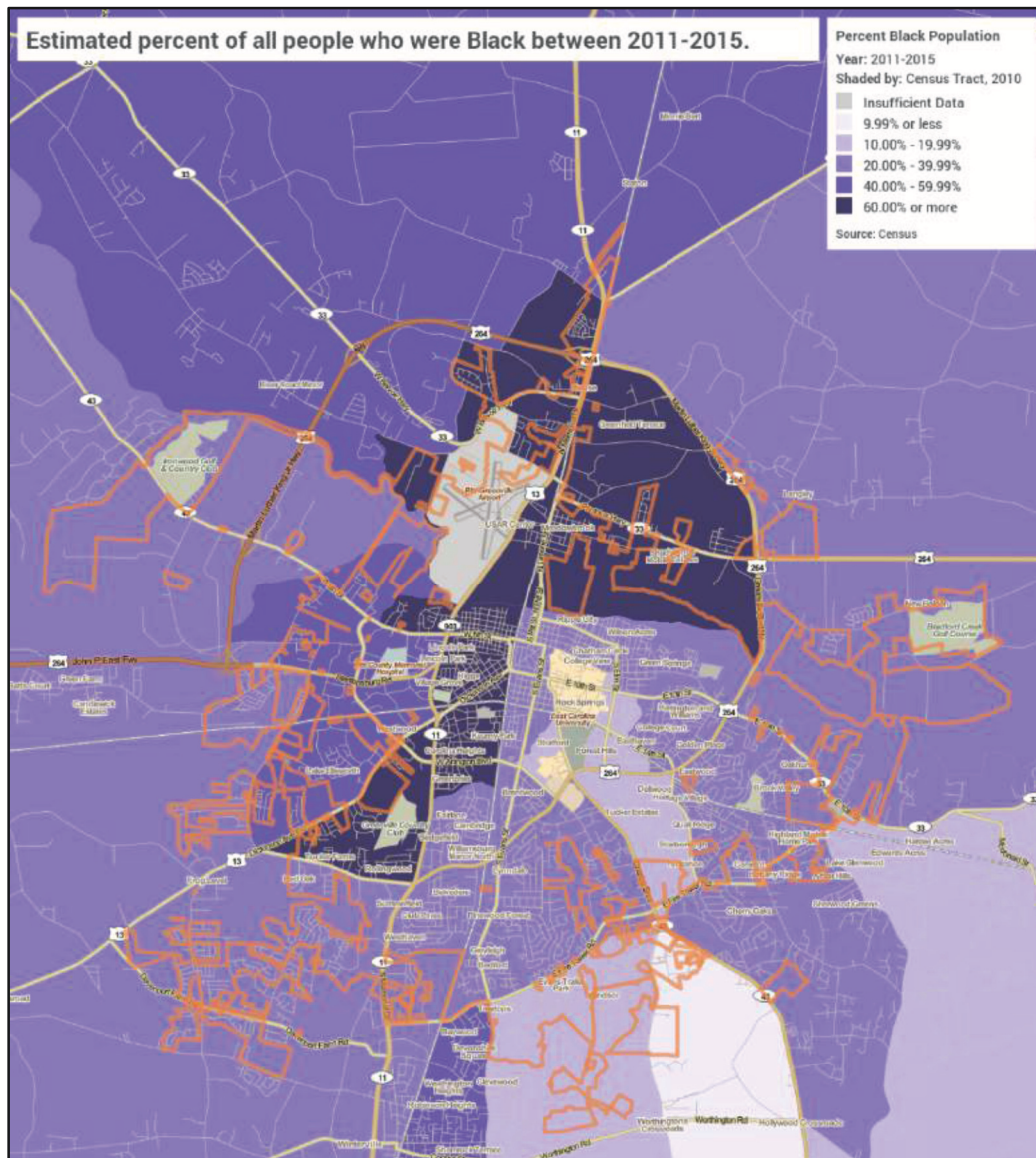
White: More than 55 percent of the population (55.85 percent) of Greenville identify as white, but there are four census tracts within the city showing a white population of more than 75 percent. The first is census tract 37147000400 and is centrally located and wraps around Eastern Carolina University primarily to the south and the east. The second census tract is 37147000301 and is located in the southcentral part of Greenville. This tract is bordered by Highway 264 to the north, Charles Boulevard to the west, E. 14th Street to the east, and Fire Tower Road to the south. The third and fourth census tracts are only partially within the city and they are both in the southwestern area. Tract 37147001303 is located south of Fire Tower Road between Evans Street and County Home Road. Tract 37147001200 is south and east of S. Charles and east of County Home Road. The following map displays the distribution of the white population in Greenville.



Source: 2011-2015 American Community Survey 5-Year Estimates via PolicyMap

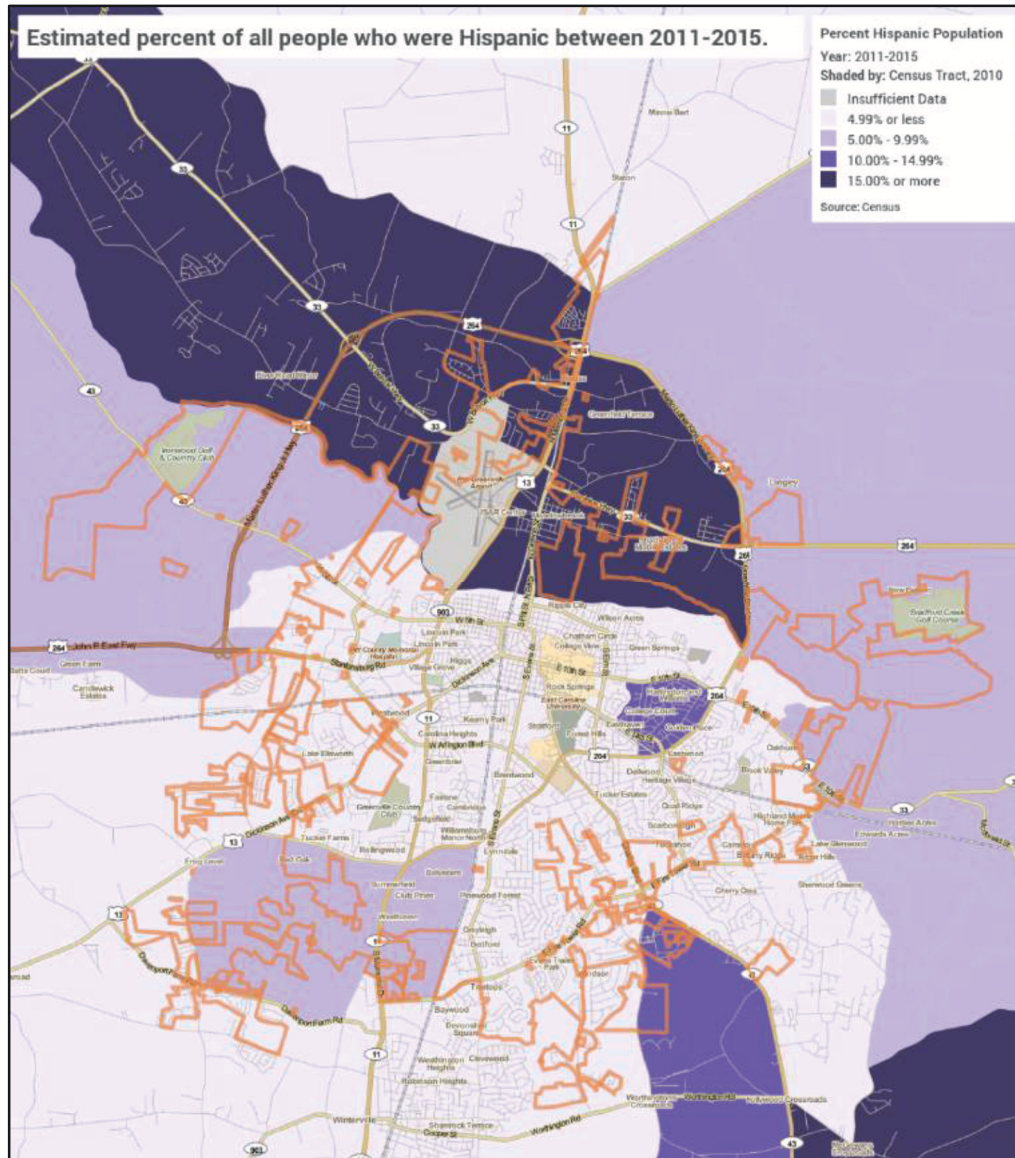
Black: Even with the sizeable population (approximately 35.65 percent) who identify as black, but there is relative segregation in the city. The CSX Rail line that runs north and south in the center of the city shows clear racial segregation. Tracts on the west side of the tracks are disproportionately populated by non-white residents and on the east side of the tract the opposite is true. There are four tracts that have a black population of 60 percent or more. Tract 3714000602 is located north of Greenville Boulevard, east of Highway 11 and southwest of Dickinson Avenue. Tract 37147000702 includes the neighborhoods of Greenbrier, Evans Park, and Carolina Heights and is boxed between the CSX Rail to the east, Memorial Drive to the west, and Spruce street to the north in the Higgs neighborhood. Tract 37147000701 includes the neighborhoods of Paige, Biltmore and half of Higgs. The

southern border is Spruce Street, the eastern border is Plant Street, and the western border is Highway 13 and moves along 5th Street. The final census tract, 37147000800, with a disproportionately large Black population is a geographically large tract near the Greenville airport that is primarily inside Highway 264.



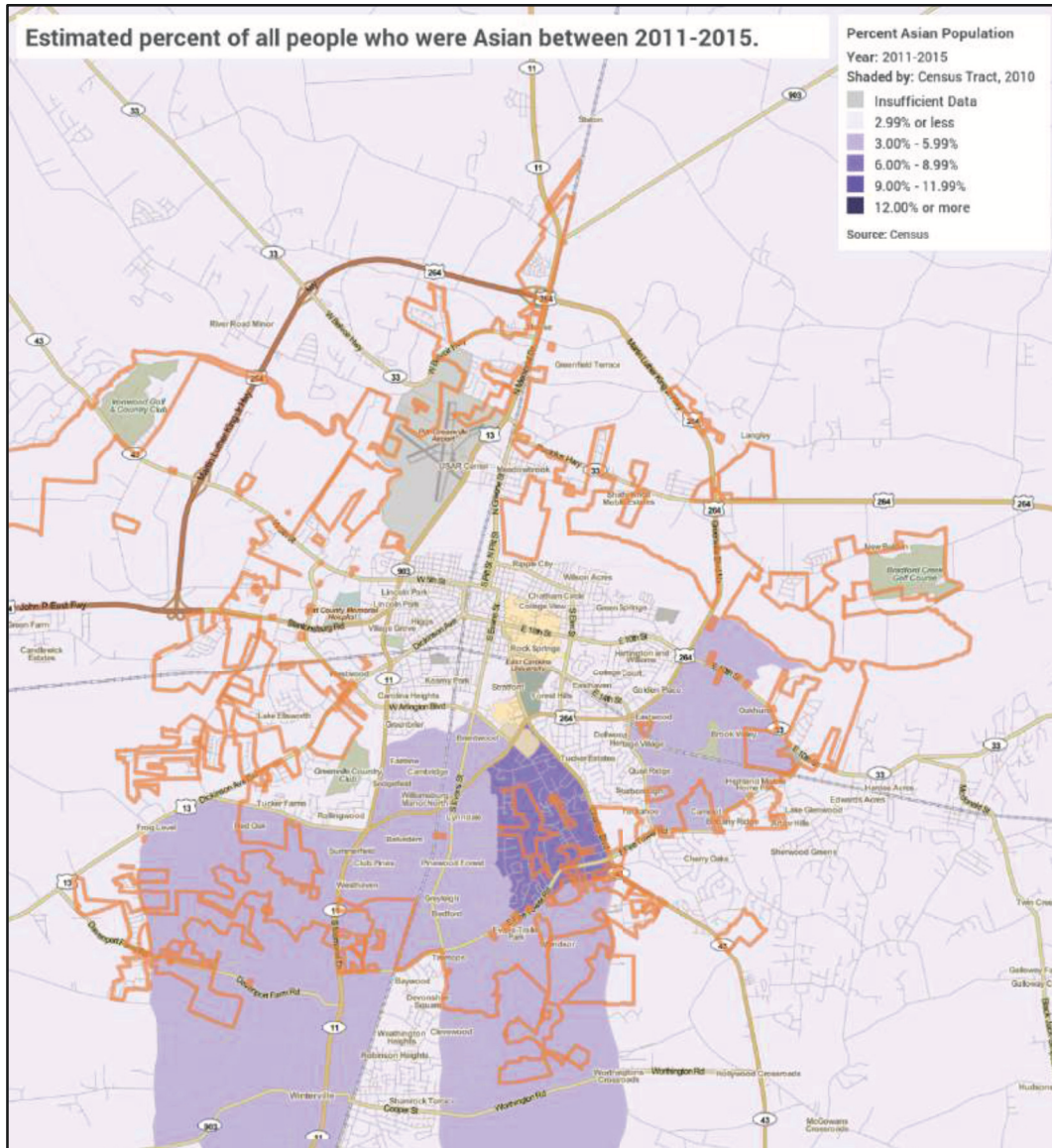
Source: 2011-2015 American Community Survey 5-Year Estimates via PolicyMap

Hispanic: Approximately 4 percent of the population of Greenville identify as Hispanic, but there is one tract with a disproportionately high Hispanic population of more than 15 percent. This tract, 37147000800 is around the Greenville airport and is the same tract with a disproportionately high black population. The following map displays the distribution of Hispanic households around the city.



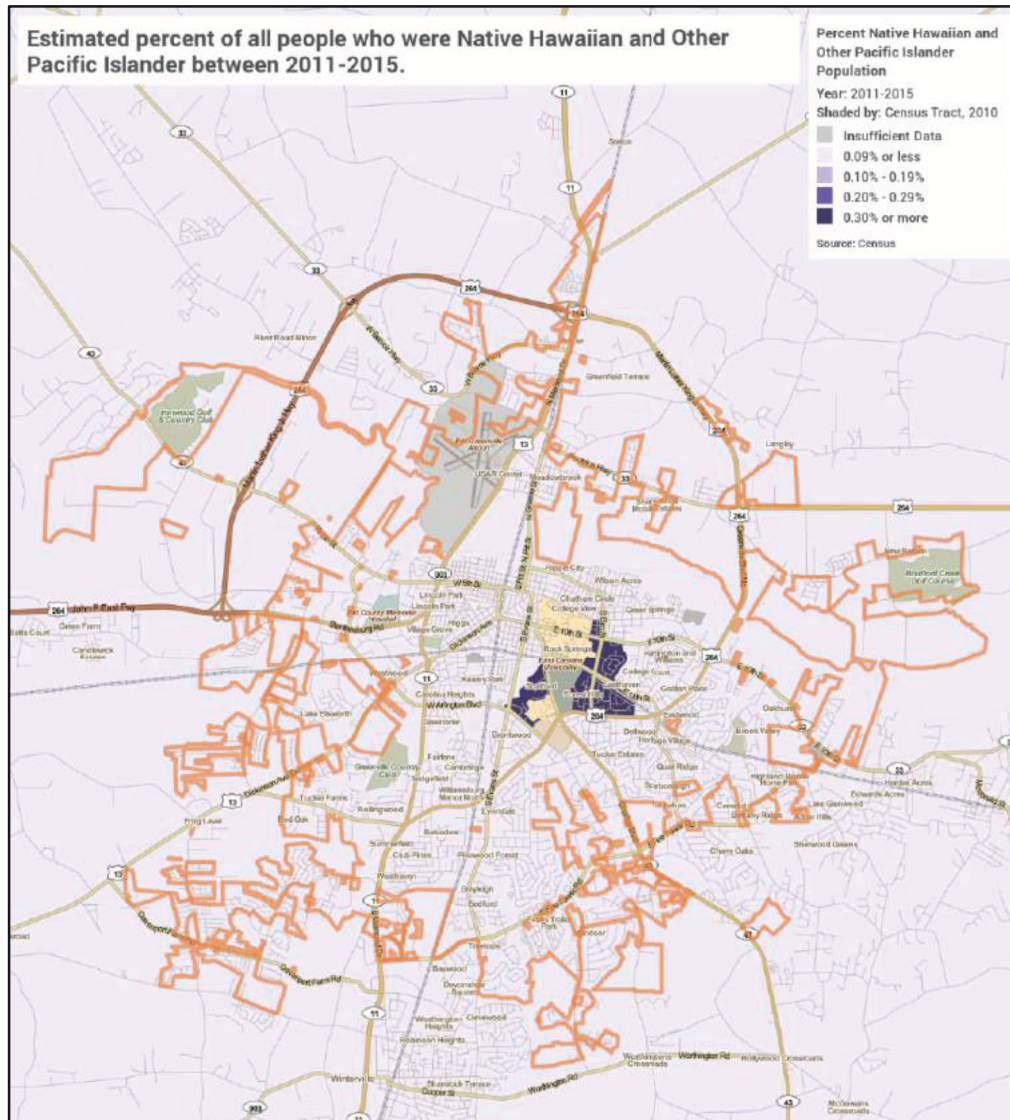
Source: 2011-2015 American Community Survey 5-Year Estimates via PolicyMap

Asian: Approximately 3 percent of Greenville identify as Asian. There are no census tracts that have a disproportionately high Asian population. The following map displays the geographic distribution of Asian residents.



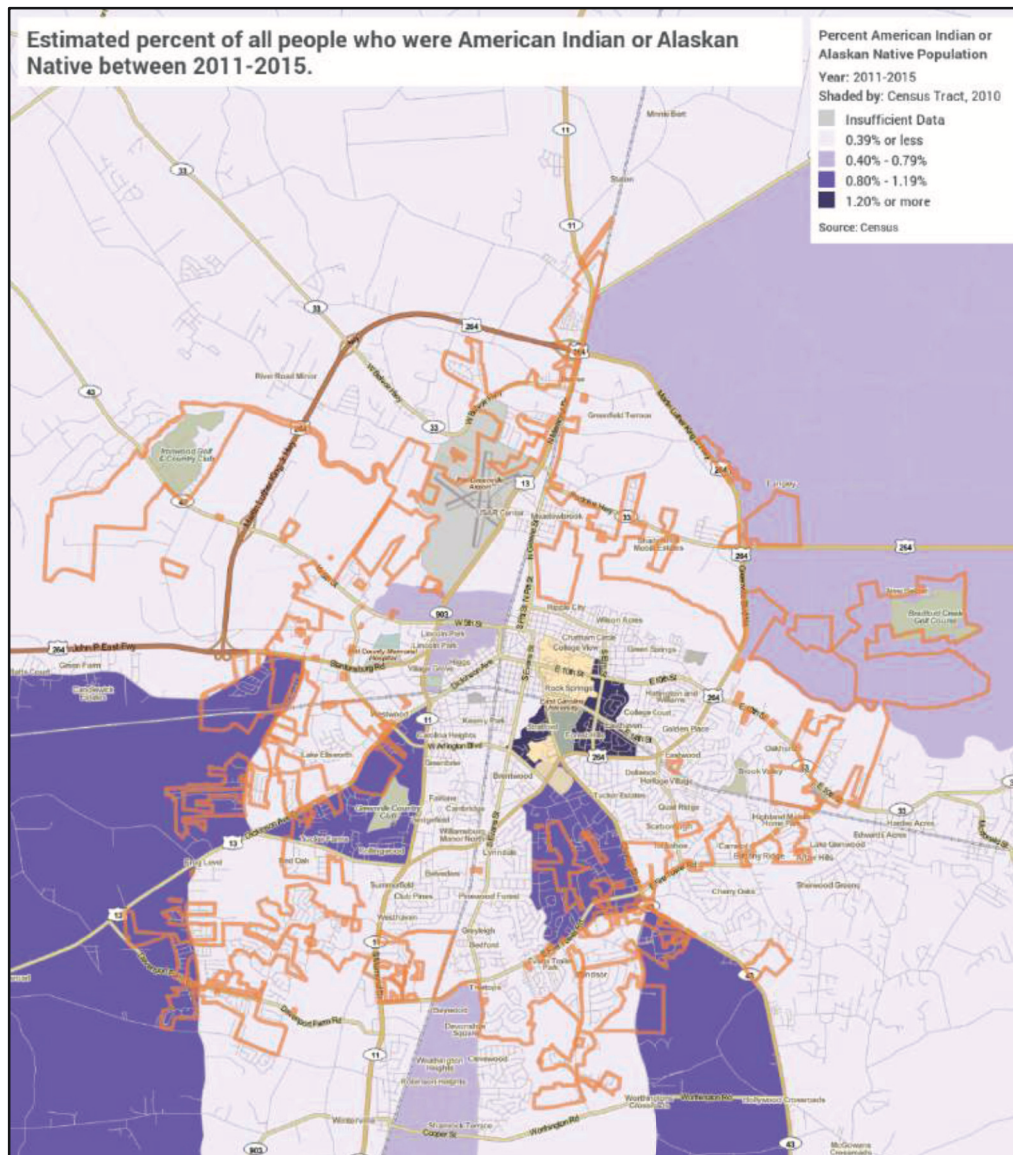
Source: American Community Survey 5-Year Estimates 2011-2015 via PolicyMap

Native Hawaiian or Other Pacific Islander: Approximately 0.03 percent of the population of Greenville identify as Native Hawaiian or Pacific Islander. One census tract, 37147000400, has a disproportionately high number of Native Hawaiian or Other Pacific Islander identified residents. The number is still very low, 0.3 percent, but that is considerably higher than the rest of the city. This tract includes East Carolina University. The following map shows the distribution of Native Hawaiian or other Pacific Islanders in Greenville.



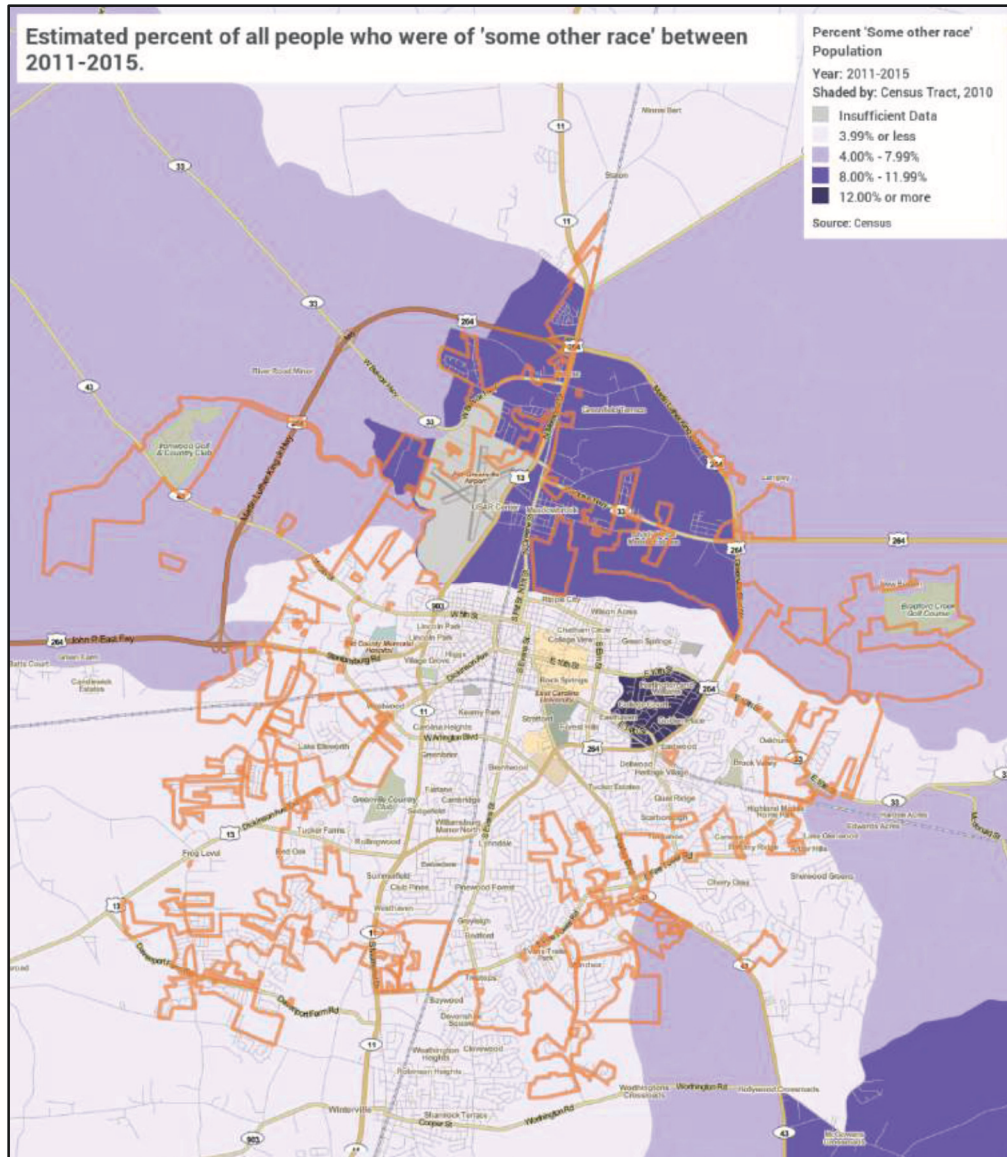
Source: 2011-2015 American Community Survey 5-Year Estimates via PolicyMap

American Indian or Alaska Native: Approximately 0.37 percent of the population fall into this category. One census tract, 37147000400, has a disproportionately high number of American Indian or Alaska Native identified residents. The number is still low, 1.8 percent, but that is considerably higher than the rest of the city. This tract includes Eastern Carolina University and points to a pattern where relatively small minority groups appear to live near the university. The following map shows the distribution of American Indian or Alaska Native in Greenville.



Source: 2011-2015 American Community Survey 5-Year Estimates via PolicyMap

Other Race: Nearly 1.7 percent of the population identifies as “Other Race” in the city. One census tract has a population of more than 12.5 percent for this group. Tract 37147000202 is located south of East 10th Street with Highway 264 as the western and southern border and includes College Court, Hartington and Williams neighborhoods. The following map displays the population distribution for this racial group.



Source: 2011-2015 American Community Survey 5-Year Estimates via PolicyMap

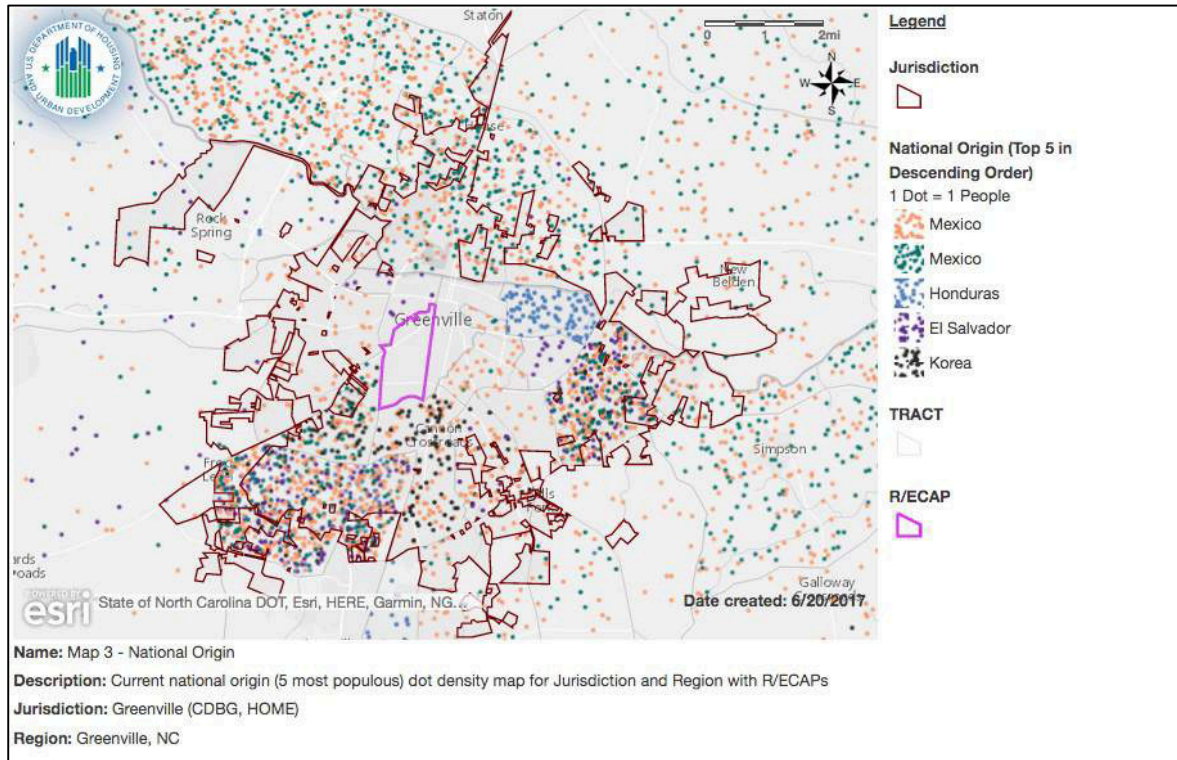
National Origin and LEP

Areas of relative segregation by national origin and LEP are intertwined. As expected, areas with a higher concentrations of residents from a foreign country also have higher rates of individuals who primarily speak the native language of that country. Despite the common overlap between language and national origin, it is important to analyze each data point separately to get a thorough look at national origin and LEP in Greenville. Several countries of common national origin share a native language (i.e., Mexico, El Salvador and Guatemala speak Spanish) and some common limited-English proficiency populations do not have a popular national origin represented in Greenville (i.e., Vietnamese, Persian and German). The following table shows the top 10 national origins and LEP languages.

Table: National Origin and Limited English Proficiency Language Populations						
	Jurisdiction: Greenville			Region: Greenville MSA		
	National Origin	Total	Percentage	National Origin	Total	Percentage
#1	India	621	0.76%	Mexico	2,934	1.84%
#2	Mexico	324	0.40%	India	686	0.43%
#3	El Salvador	268	0.33%	Canada	369	0.23%
#4	China*	231	0.28%	El Salvador	279	0.18%
#5	Korea	225	0.28%	Korea	243	0.15%
#6	Canada	182	0.22%	China*	231	0.14%
#7	Taiwan	153	0.19%	Japan	222	0.14%
#8	Egypt	146	0.18%	Philippines	183	0.11%
#9	Japan	136	0.17%	Egypt	174	0.11%
#10	Guatemala	135	0.17%	Taiwan	153	0.10%
	Jurisdiction: Greenville			Region: Greenville MSA		
	LEP Language	Total	Percentage	LEP Language	Total	Percentage
#1	Spanish	649	0.80%	Spanish	3,282	2.06%
#2	Chinese	251	0.31%	Chinese	251	0.16%
#3	Arabic	116	0.14%	Arabic	116	0.07%
#4	Vietnamese	94	0.12%	Portuguese	108	0.07%
#5	Portuguese	81	0.10%	Vietnamese	108	0.07%
#6	Korean	69	0.08%	French	105	0.07%
#7	French	65	0.08%	Japanese	100	0.06%
#8	Persian	47	0.06%	Korean	69	0.04%
#9	Japanese	39	0.05%	Persian	62	0.04%
#10	German	37	0.05%	German	37	0.02%
Source: American Community Survey 2009-2013 *Excluding Taiwan and Hong Kong						

The following map shows the geographic distribution of residents by national origin in Greenville. These distributions show some patterns of segregation, primarily with residents from El Salvador who live mostly in one census tract. It also appears that residents with a foreign national origin rarely live in large numbers in the central part of Greenville or in the two central R/ECAP tracts.

HUD Map 3 – National Origin

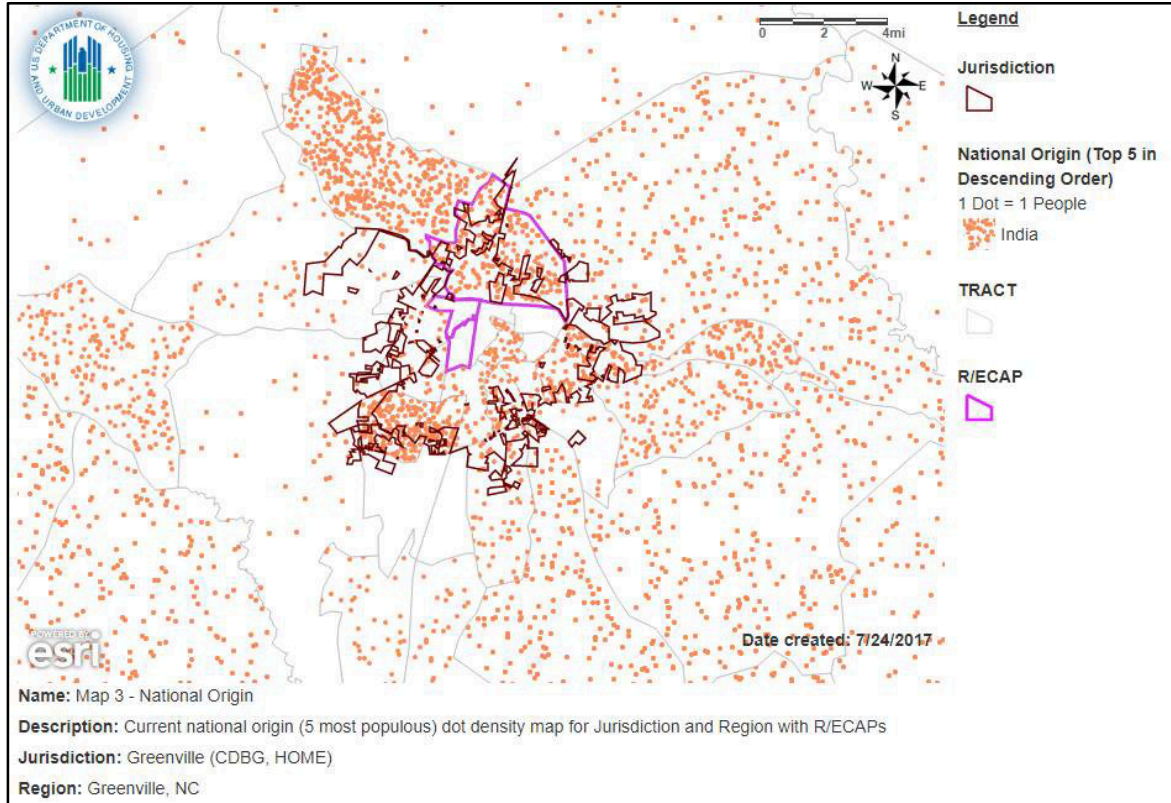


Source: HUD

National Origin – India

Residents from India are mostly spread uniformly around the jurisdiction. There are a few census tracts that lack residents from India, primarily in the west central part of the city that include two R/ECAPs. The following HUD-provided map displays the distribution of India-born residents in the jurisdiction.

HUD Map 3 – National Origin, India

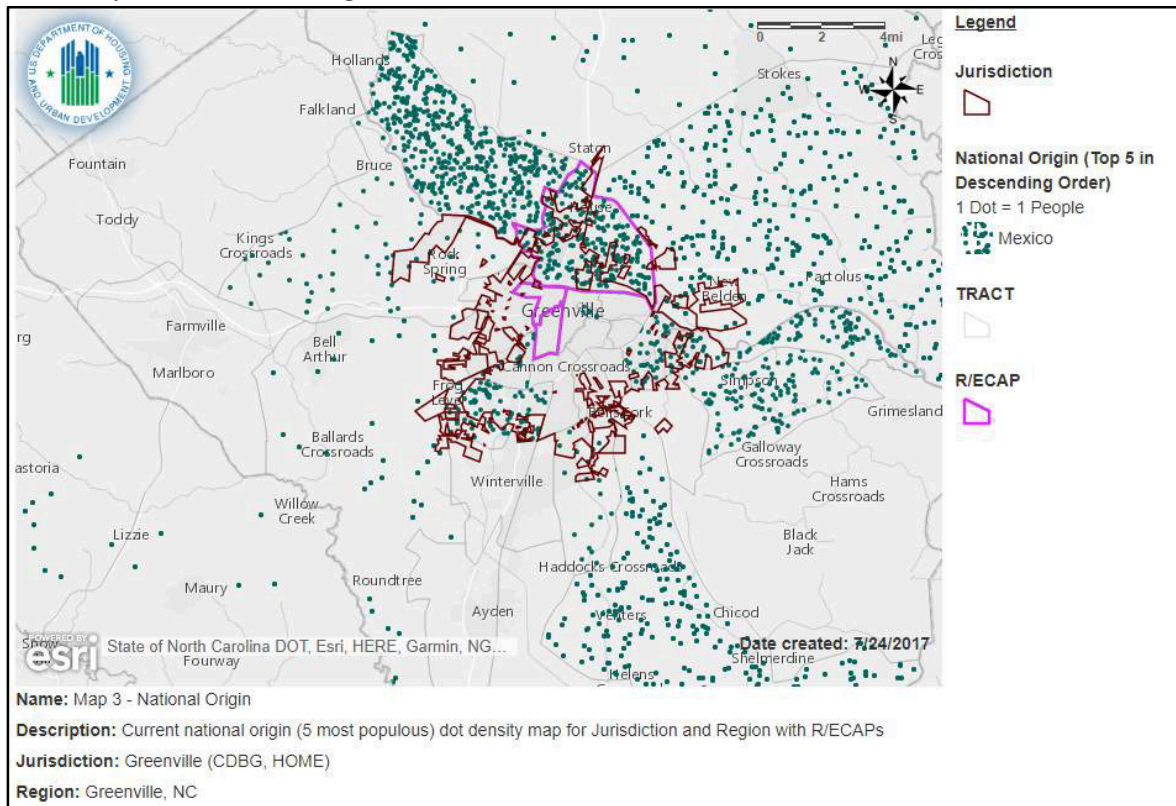


Source: HUD

National Origin – Mexico

Residents from Mexico live primarily in census tracts around the outer edges of the city, particularly in the north, east and southwest. The central part of the city has a significantly lower number of residents from Mexico than the outer tracts.

HUD Map 3 – National Origin, Mexico

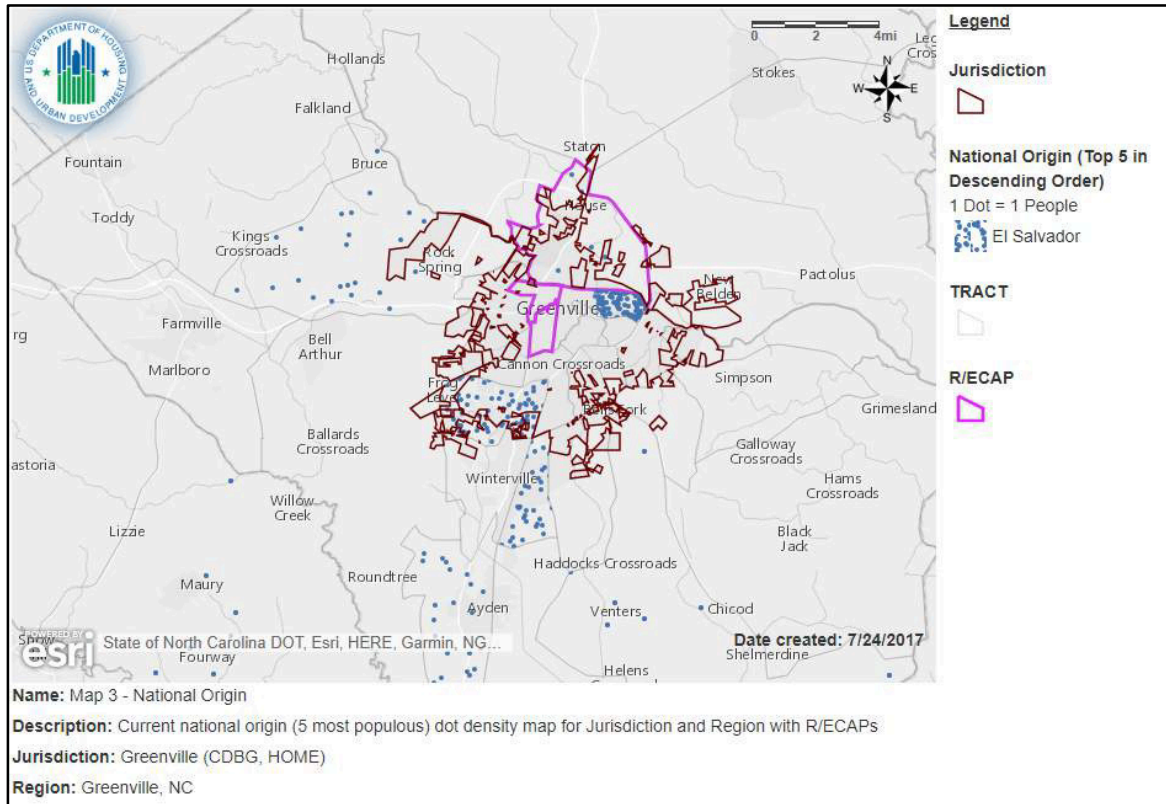


Source: HUD

National Origin – El Salvador

Residents from El Salvador tend to live clustered in two census tracts in Greenville. The first is located in the northeastern part of the city and the second in the southwestern part. Such relative segregation could have many causes and is worth noting.

HUD Map 3 – National Origin, El Salvador

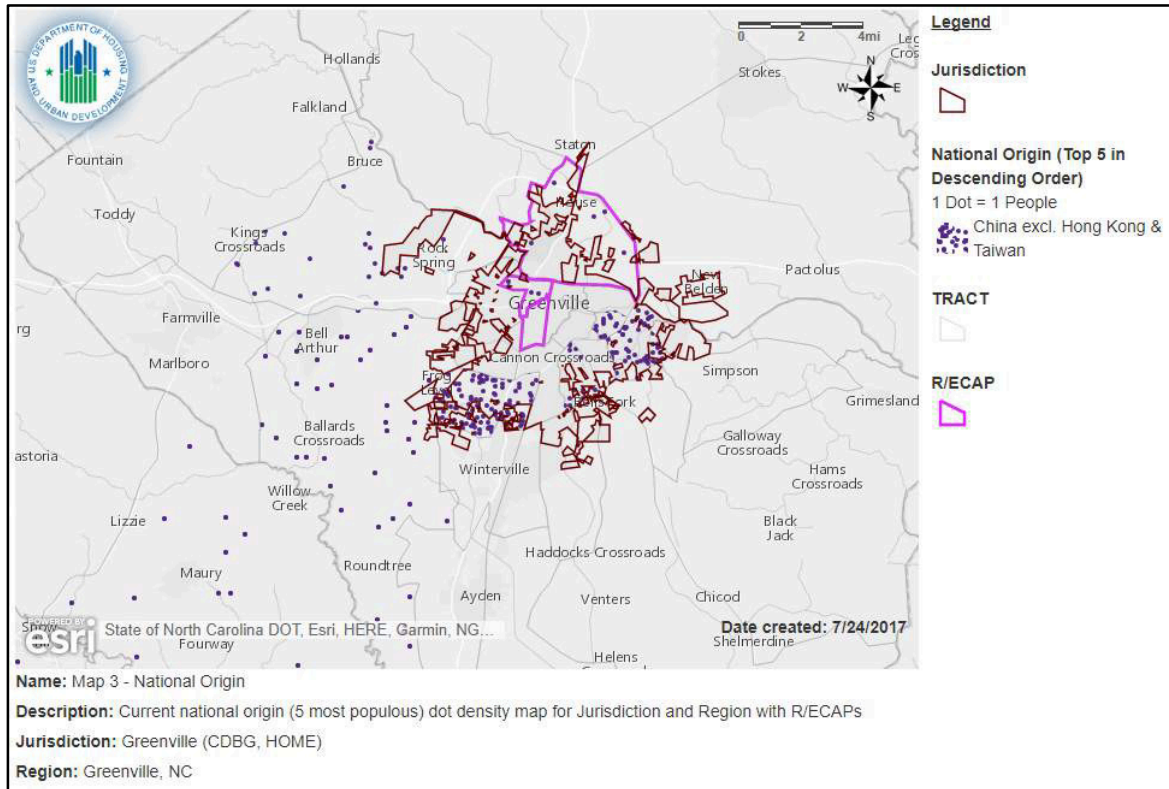


Source: HUD

National Origin – China, excluding Hong Kong & Taiwan

Greenville residents from China show similar living patterns to residents from El Salvador. They live primarily in two census tracts, one in the southwest and two in the east. These tracts also have a relatively high population of residents from El Salvador, Mexico and India.

HUD Map 3 – National Origin, China, excluding Hong Kong & Taiwan

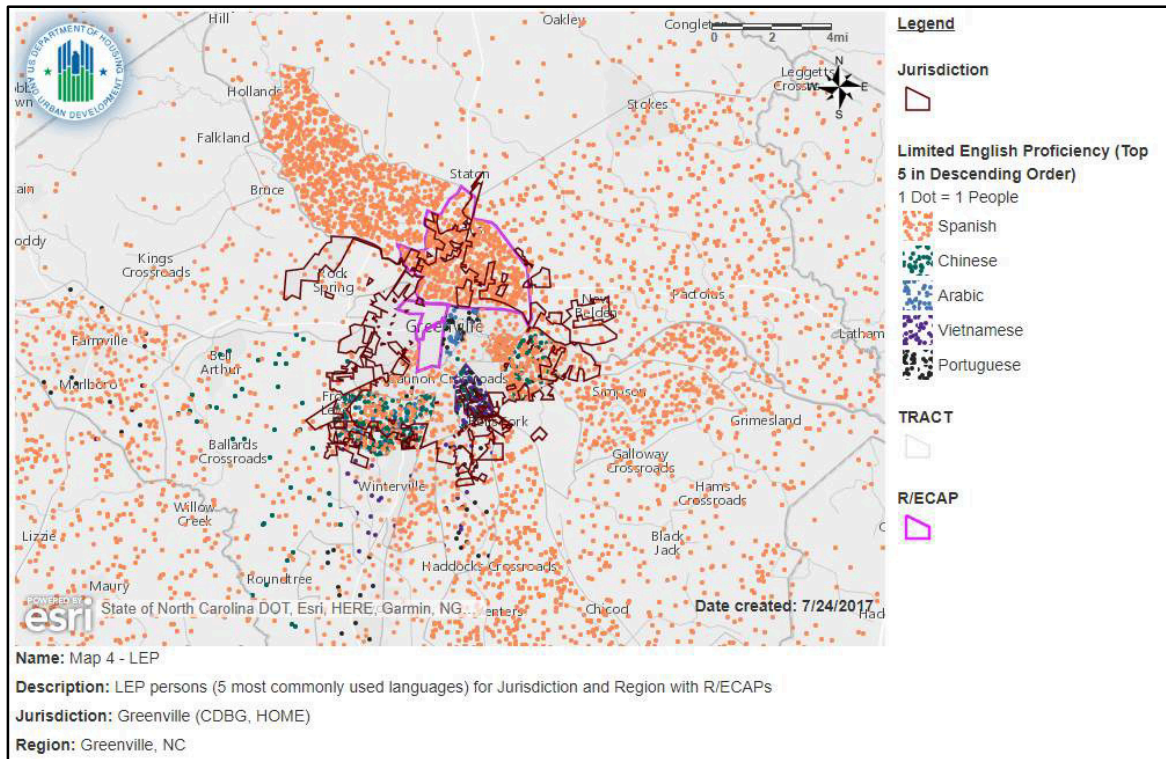


Source: HUD

Limited English Proficiency

The following map displays the distribution of residents who have limited English proficiency by language. Overall, the population with limited English proficiency is fairly distributed around the jurisdiction (with the two R/ECAP tracts near downtown and the surrounding area as a notable exception) but the particular languages spoken by these populations seem to be segregated into specific tracts.

HUD Map 4 - LEP

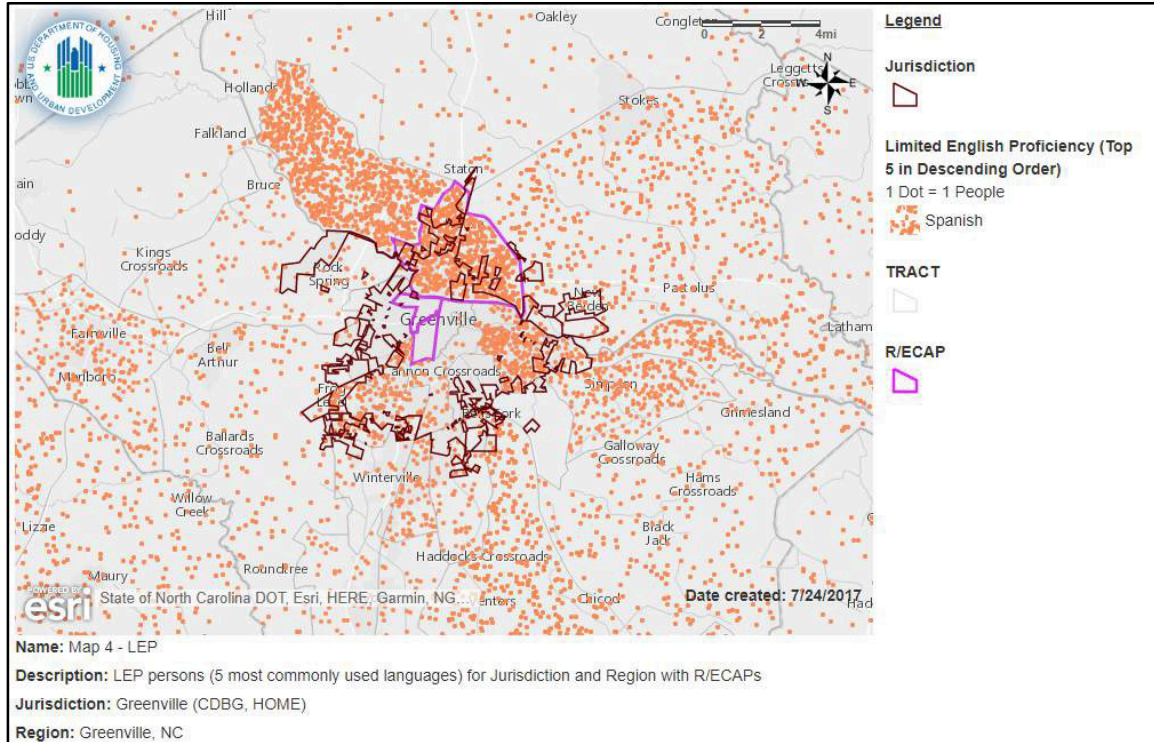


Source: HUD

Limited English Proficiency – Spanish

Not surprisingly, the distribution of the limited English proficiency population that speaks Spanish is closely correlated with the census tracts that have a high Mexican and El Salvadorian populations. The populations are primarily in the census tracts along the outside of the city, especially in the north R/ECAP tract near the airport.

HUD Map 4 – LEP, Spanish

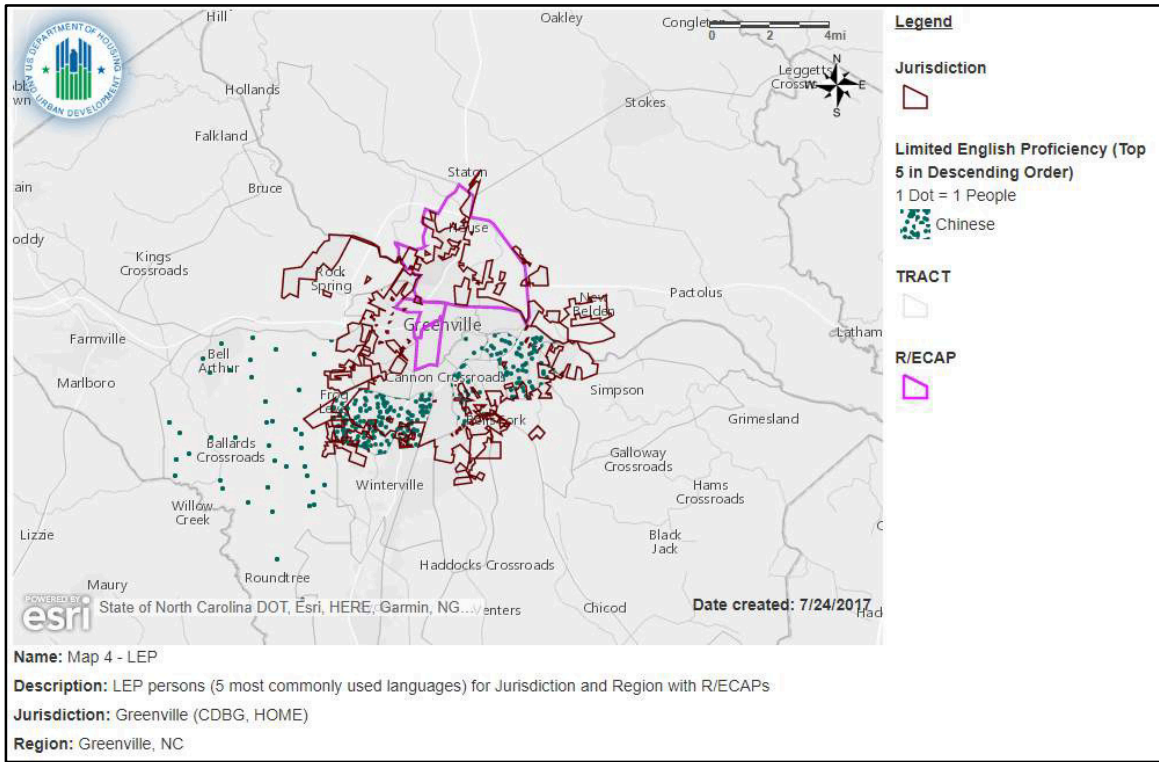


Source: HUD

Limited English Proficiency – Chinese

The limited English proficiency population that speaks Chinese is primarily in the eastern and southwestern corners of the jurisdiction. These are the same census tracts with a relatively high foreign-born population from China.

HUD Map 4 – LEP, Chinese

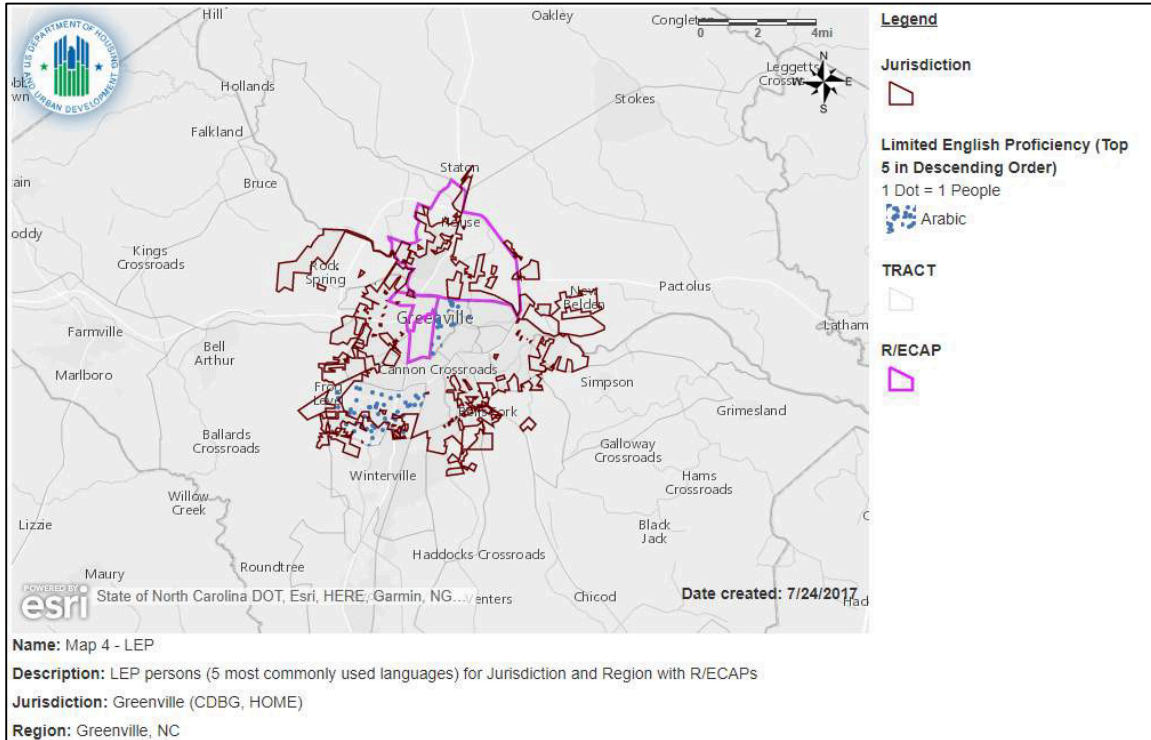


Source: HUD

Limited English Proficiency – Arabic

Arabic-speaking residents who have limited English proficiency live almost exclusively in two census tracts. The first tract is the southwest and is the same tract with a high foreign-born population. The second tract is near the downtown area southeast of the R/ECAP tracts.

HUD Map 4 – LEP, Arabic

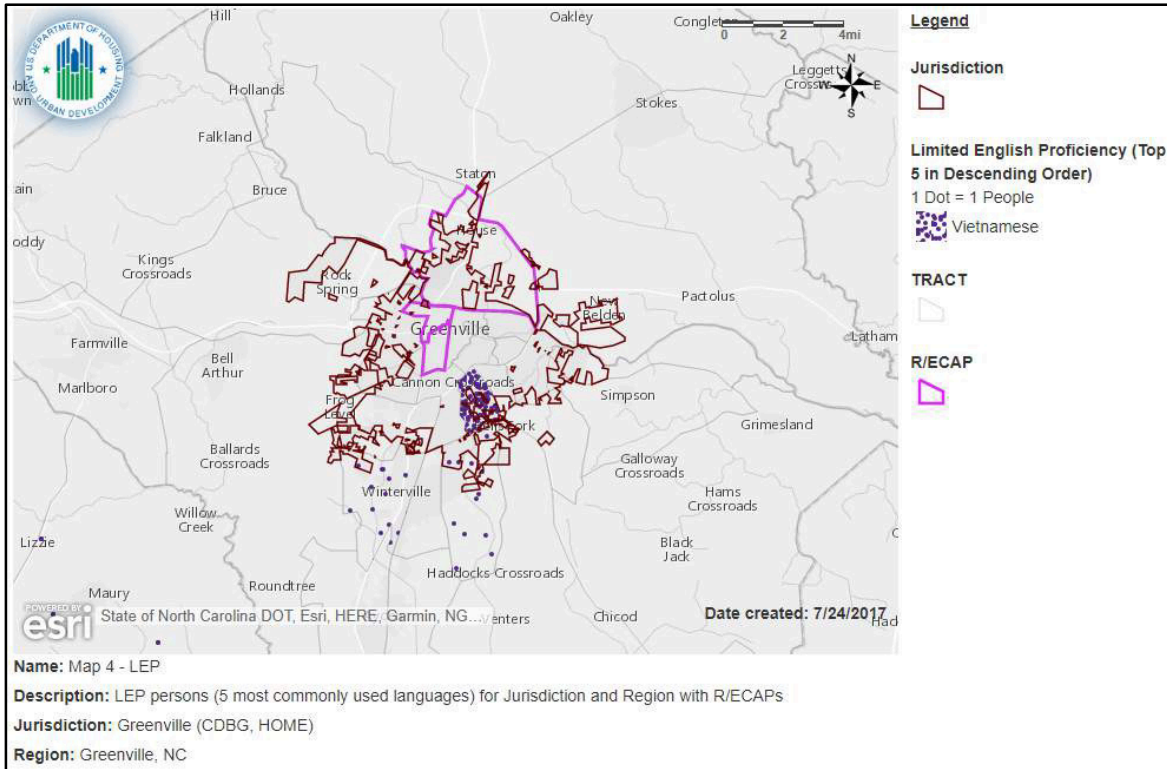


Source: HUD

Limited English Proficiency – Vietnamese

The Vietnamese speaking population lives almost entirely in one area of the city. While Vietnam is not a country of origin for a significant foreign-born population in Greenville, there are areas of China where Vietnamese is the primary language and it is possible that affects this statistic. Regardless of the reason, this population appears to be deeply segregated from the rest of the city and care should be taken to analyze and address this.

HUD Map 4 – LEP, Vietnamese

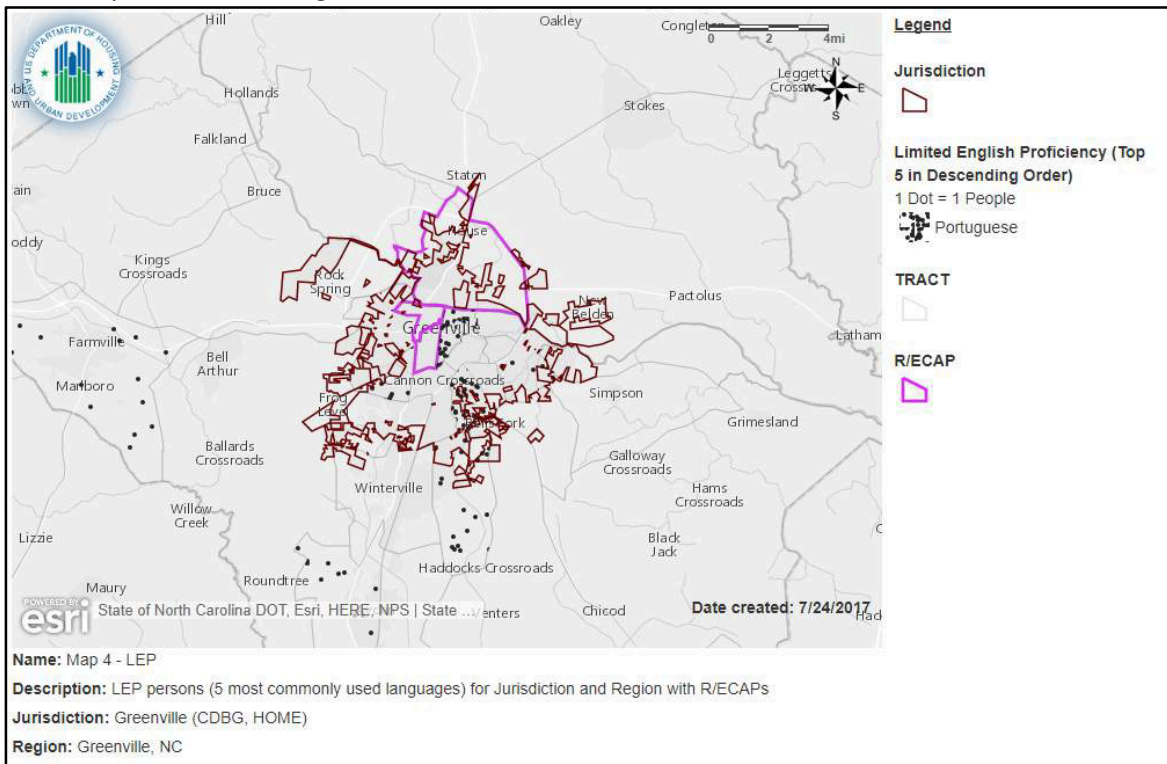


Source: HUD

Limited English Proficiency - Portuguese

The Portuguese-speaking population is relatively small and is present only in a handful of census tracts. This population resides near downtown and in the southeast corner of the city.

HUD Map 4 – LEP, Portuguese



Source: HUD

c. **Explain how these segregation levels and patterns in the jurisdiction and region have changed over time (since 1990).**

Since 1990, according to the racial/ethnic dissimilarity trends provided by HUD, the overall levels of segregation have increased slightly in Greenville, but the change has not been uniform. The segregation score between black and white populations has grown from 44.79 to 49.69, and the scores between Hispanic and white populations have grown from 22.71 to 33.67. On the other hand, the scores between Asian or Pacific Islander and white populations have decreased from 32.75 to 21.68.

The region saw a similar, but generally not as extreme change in segregation. The non-white/white index scores did not change overall, but the white and black scores increased slightly from 40.08 to 42.00. Additionally, the Hispanic and white index score increased significantly from 22.66 to 35.35. Finally, the Asian or Pacific Islander and white populations saw a slight decrease from 38.06 to 34.21.

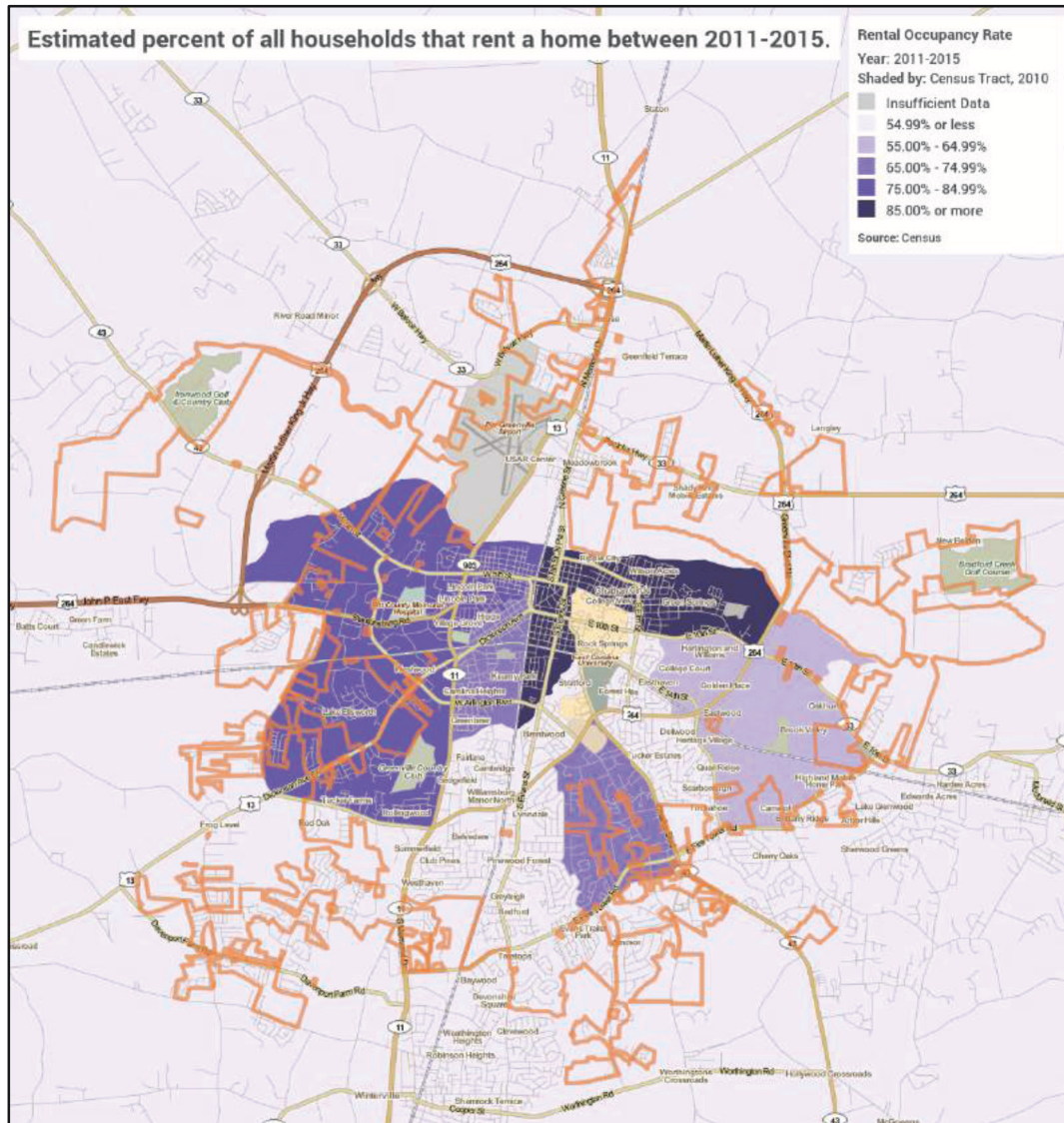
d. **Consider and describe the location of owner and renter occupied housing in the jurisdiction and region in determining whether such housing is located in segregated or integrated areas, and describe trends over time.**

Per the 2011-2015 American Community Survey, the rental occupancy rate in Greenville is 65.19 percent. The following table shows the five census tracts with rental occupancy above the city average and their racial/ethnic populations. This makes it possible to determine if rental housing is primarily in a segregated or integrated area. Four tracts have a disproportionately high black population and renter population. These cells are highlighted below.

Area	Percentage	Black	Hispanic
37147000601	79.17%	58.92%	2.52%
37147000701	80.90%	81.08%	4.19%
37147000602	76.48%	60.20%	1.75%
37147000702	67.23%	93.84%	3.36%
37147000100	88.11%	28.01%	3.01%
37147000201	93.41%	26.04%	4.48%
Greenville	65.19%	37.76%	4.11%
Source: 2011-2015 American Community Survey 5-Year Estimates			

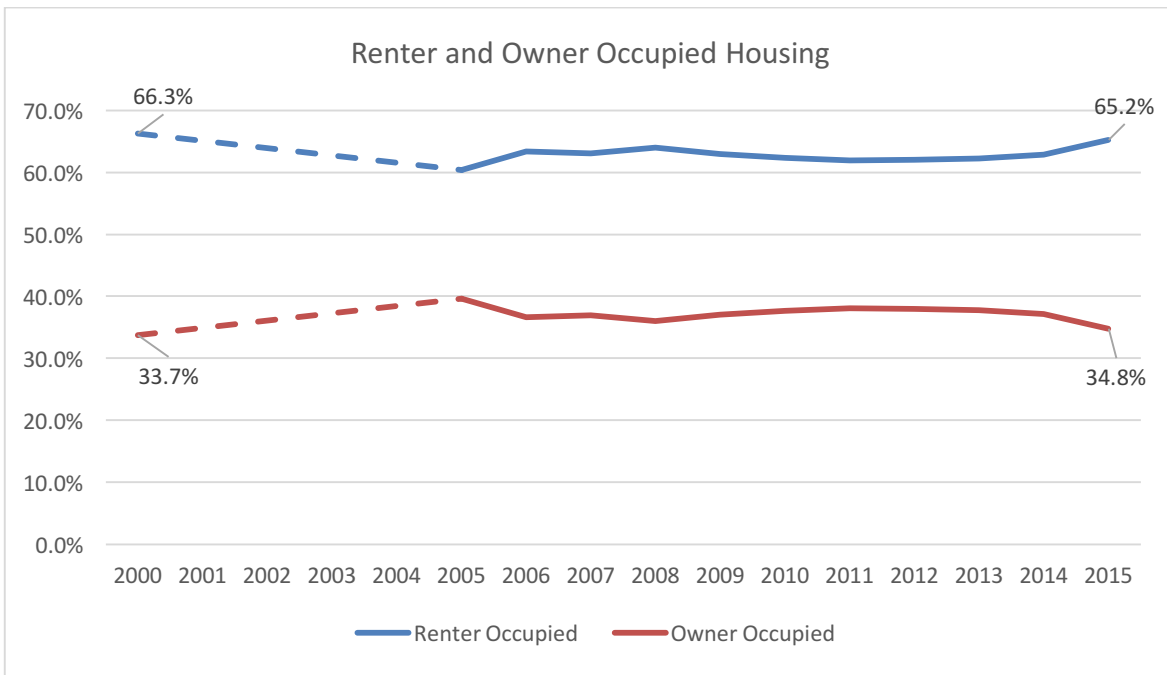
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The following map shows the geographic distribution of rental occupancy rates by census tract. The geographic distribution of renter-occupied housing units is not uniform in the city. The southern and eastern parts of the city, as well as the census tract near the airport, are primarily owner occupied. Conversely, tracts near the college and to the west of the rail tracks are primarily renter-occupied.



Source: 2011-2015 American Community Survey 5-Year Estimates via PolicyMap

According to data collected by the U.S. Census Bureau, homeownership rates remained fairly constant in Greenville between 2000 and 2015. In 2000, 33.7 percent of the occupied housing units were owner-occupied. By 2015, that demographic made up 34.8 percent of occupied housing units. The following table displays renter and owner-occupied housing data over time. Data note: the U.S. Census did not collect this data during 2001, 2002, 2003 or 2004.



Source: U.S. Census – American Community Survey and Decennial Census

Cost burdened households are a significant problem throughout the United States, and Greenville is no exception. According to HUD, a household is cost burdened if they are paying more than 30 percent of their income on housing costs. Over the last five years, the overall rate of cost burdened households has changed very little, in fact it has decreased slightly by 0.6 percent. But, that lack of change is deceptive because there has been significant change within certain demographics. The rate of renters and homeowners without a mortgage (specifically those who are elderly or otherwise on fixed incomes) that are cost burdened have both increased while homeowners with mortgages have seen a decrease in the rate of being cost burdened.

This is a troubling trend given the challenges renters and homeowners without a mortgage face. Nearly 60 percent of renters are cost burdened and that rate appears to be rising. Renters tend to face greater financial and housing instability, particularly when property prices rise. The increase in property value turns into increased rents which forces many

residents to be cost burdened or live in substandard housing. Residents of owner-occupied housing without a mortgage face being cost burdened at the lowest rate, but they also have a greater likelihood of being on a fixed income. Residents on a fixed income are often unable to handle the costs that come with home maintenance or increased property taxes that accompany an increase in home value. The following table displays cost burden within Greenville.

TABLE: Cost Burdened Households						
	2010		2015		Change	
	#	%	#	%	#	%
Renter Occupied Housing	11,658	58.4%	12,989	59.4%	+1,331	+1.0
Owner Occupied Housing with a Mortgage	3,425	35.4%	2,481	28.2%	-944	-7.2%
Owner Occupied Housing without a Mortgage	407	13.4%	524	15.0%	+931	+1.6%
Total Occupied Housing	15,409	47.4%	15,994	46.8%	+585	-0.6%
Source: American Community Survey 5-Year Estimates						

e. **Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future. Participants should focus on patterns that affect the jurisdiction and region rather than creating an inventory of local laws, policies, or practices.**

Overall, according to HUD-provided data, segregation is growing in Greenville, particularly between white and black populations, as well as the Hispanic and white populations. Maps reveal substantial segregation along racial and ethnic lines. These trends may be influenced by policies or practices within the city, including the location of rental housing or publicly supported housing if those housing options disproportionately affect households based on race or ethnicity.

2. Additional Information

- a. **Beyond the HUD-provided data, provide additional relevant information, if any, about segregation in the jurisdiction and region affecting groups with other protected characteristics.**

The Federal Fair Housing Act prevents housing discrimination based on the following protected classes: race, color, national origin, religion, sex/gender, familial status and disability. Race and national origin are addressed above and disability is addressed later in this document. The North Carolina State Fair Housing Act reinforces these protections but does not expand them to any other protected groups, and Greenville does not provide explicit housing protections for any groups.

The current data available does not point to segregation in the jurisdiction affecting groups with other protected characteristics.

- b. **The program participant may also describe other information relevant to its assessment of segregation, including activities such as place-based investments and geographic mobility options for protected class groups.**

The Housing Authority of the City Greenville “promotes the development of professional management of a variety of affordable housing opportunities, facilities and supportive services to nurture neighborhoods, provide economic development and self-sufficiency activities for residents while also assuring equal access to safe, quality housing for low- and moderate-income families throughout the community.”

To accomplish this goal, the Housing Authority of the City of Greenville runs the following programs:

- Family Self Sufficiency – this voluntary program assists families receiving HUD Housing Choice Voucher or living in public housing to improve their economic situation
- HCV Homeownership – The HCV Homeownership Program provides low-income, disabled and elderly families who are eligible to expand their housing options.
- Housing Choice Voucher Program – This program offers expanded opportunities for rental assistance for very low-income families, defined as 50 percent of area median income, in privately owned housing units.

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3. Contributing Factors of Segregation

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of segregation.

- Community opposition
- Displacement of residents due to economic pressures
- Lack of community revitalization strategies
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Lack of regional cooperation
- Land use and zoning laws
- Lending discrimination
- Location and type of affordable housing
- Loss of Affordable Housing
- Occupancy codes and restrictions
- Private discrimination
- Source of income discrimination
- Other

Zoning and land use ordinances can increase segregation along racial and ethnic lines. It is illegal to discriminate in this way, but the result of the ordinances may still be segregation. When laws determine *the location and type of affordable housing* into one area that can lead to segregation in communities where protected status and income are correlated.

Community opposition to integration is a difficult thing to accurately judge but potentially exists in every community. There are often stereotypes that low-income residents will bring down the property value of the neighborhood and may attract crime, and low-income residents often lack a voice in policy discussions. Even when communities recognize the need for public housing and publicly subsidized housing, like Low-Income Housing Tax Credits, throughout the city there can be a “Not In My Backyard” (NIMBY) view of public housing that may increase integration.

Rising housing costs can lead to *displacement of residents due to economic pressures*. As the cost of housing rises, it can push out low-income residents, particularly renters who do not see rising housing costs as an increase in the value of their investment. When income is strongly linked to race or ethnicity this can lead to racial and ethnic segregation. Low-income residents gather together along racial and ethnic lines and are priced out of more

affluent areas.

The following table displays economic changes over time within Greenville. The city has seen considerable growth in housing costs for homeowners, gross rent and the rate of cost-burdened residents. In addition, while the median household income has increased it has not done so at a rate that keeps pace with housing cost increases, particularly for renters.

TABLE: Economic Changes Over Time			
	2000	2015	Percent Change
Median Gross Rent	\$482	\$742	53.9%
Median Owner Housing Costs (with Mortgage)	\$1,036	\$1,265	22.1%
Median Owner Housing Costs (without Mortgage)	\$349	\$473	35.5%
Home Value	\$110,200	\$147,100	33.5%
Cost Burdened Renters	45.3%	59.4%	24.5%
Cost Burdened Home Owners	20.0%	24.5%	22.5%
Median Household Income	\$28,487	\$34,435	20.9%
Source: 2011-2015 American Community Survey 5-Year Estimates, 2000 Decennial Census			

II. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)

1. Analysis

a. Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction and region.

According to HUD, a racially/ethnically-concentrated area of poverty (R/ECAP) is defined as follows:

[R/ECAP] involves a racially/ethnic concentration threshold and a poverty test. The racial/ethnic concentration threshold is straightforward: R/ECAPs must have a non-white population of 50 percent or more. Regarding the poverty threshold, Wilson (1980) defines neighborhoods of extreme poverty as census tracts with 40 percent or more individuals living at or below the poverty line. Because overall poverty levels are substantially lower in many parts of the country, HUD supplements this with an alternate criterion. Thus, a neighborhood can be a R/ECAP if it has a poverty rate that exceeds 40 percent or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower

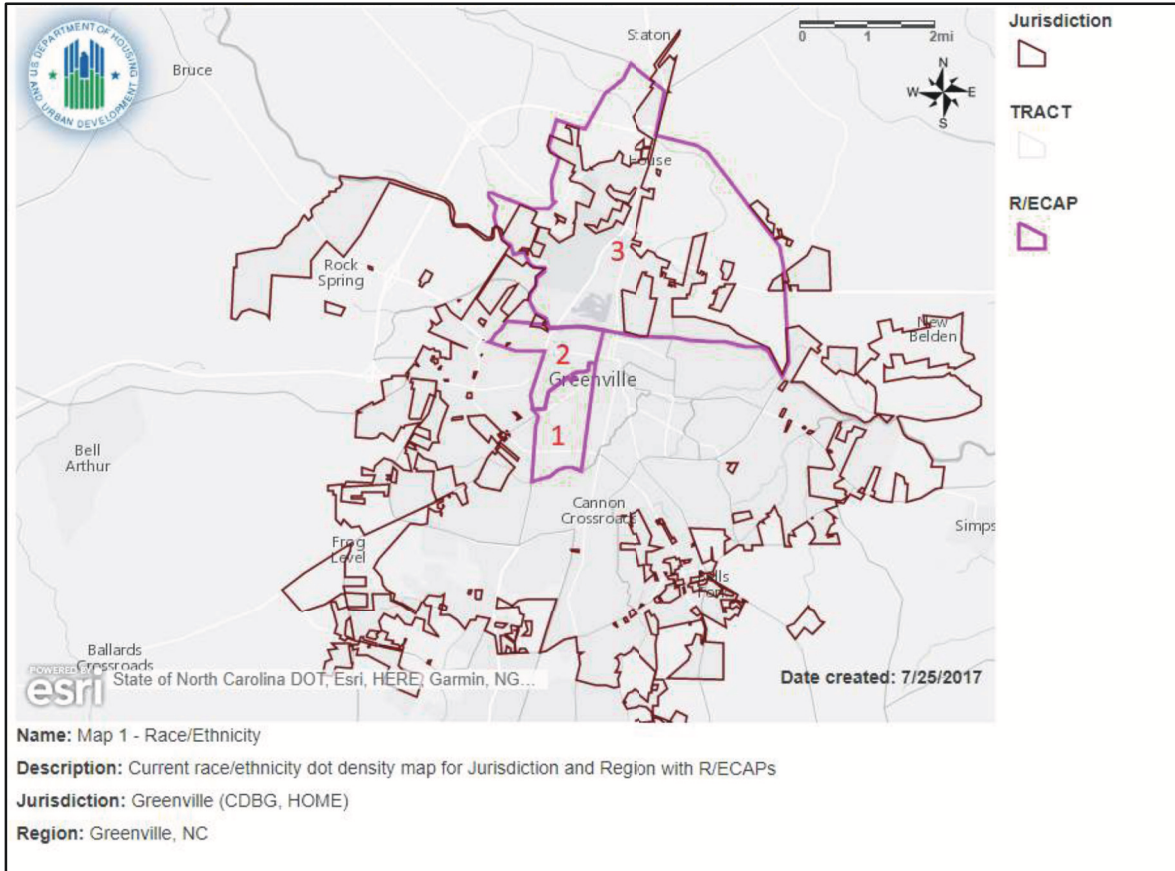
Based on the Affirmatively Furthering Fair Housing (AFFH) mapping tool, there are three R/ECAP tracts in the jurisdiction.

Tract 3714700702 (labeled “1” in the map below) is located in the western downtown area of Greenville to the west of the CST tracts. The western border is Highway 13 and the north border is Spruce Street. The tract’s southern border runs between Millbrook street and Ridge Place. The following map displays the R/ECAP tract in Greenville.

Tract 37147000701 (labeled “2” in the map below) is a tract that is shaped like the number “7” and is located north of Tract 3714700702.

Tract 3714000800 (labeled “3” in the map below) is a geographically large tract on the north end of the city that includes the Pitt-Greenville Airport. The east and northern borders are Highway 264 and the southern border is the Tar River.

HUD Map 1 – R/ECAP Tracts



Source: HUD

b. Describe and identify the predominant protected classes residing in R/ECAPs in the jurisdiction and region. How do these demographics of the R/ECAPs compare with the demographics of the jurisdiction and region?

Within Greenville’s R/ECAP tract the predominant protected class is black, non-Hispanic. The primary country of origin for foreign born residents is Mexico. The following table displays the complete demographics of this tract.

TABLE: R/ECAP Demographics			
Race/Ethnicity		#	%
Total Population		9,066	--
White, Non-Hispanic		1,071	11.81%
Black, Non-Hispanic		7,292	80.43%
Hispanic		465	5.46%
Asian or Pacific Islander, Non-Hispanic		66	0.73%
Native American, Non-Hispanic		33	0.36%
Other, Non-Hispanic		3	0.03%
Family Type		#	%
Total Families		2,053	--
Families with Children		874	42.57%
National Origin	Country	#	%
#1 Country of Origin	Mexico	142	1.70%
#2 Country of Origin	Venezuela	42	0.50%
#3 Country of Origin	Spain	22	0.26%
#4 Country of Origin	Peru	13	0.16%
#5 Country of Origin	China*	11	0.13%
#6 Country of Origin	Japan	9	0.11%
#7 Country of Origin	El Salvador	3	0.04%
#8 Country of Origin	<i>Null</i>	0	0.00%
#9 Country of Origin	<i>Null</i>	0	0.00%
#10 Country of Origin	<i>Null</i>	0	0.00%
Source: American Community Survey 5-Year Estimates *Excluding Hong Kong and Taiwan			

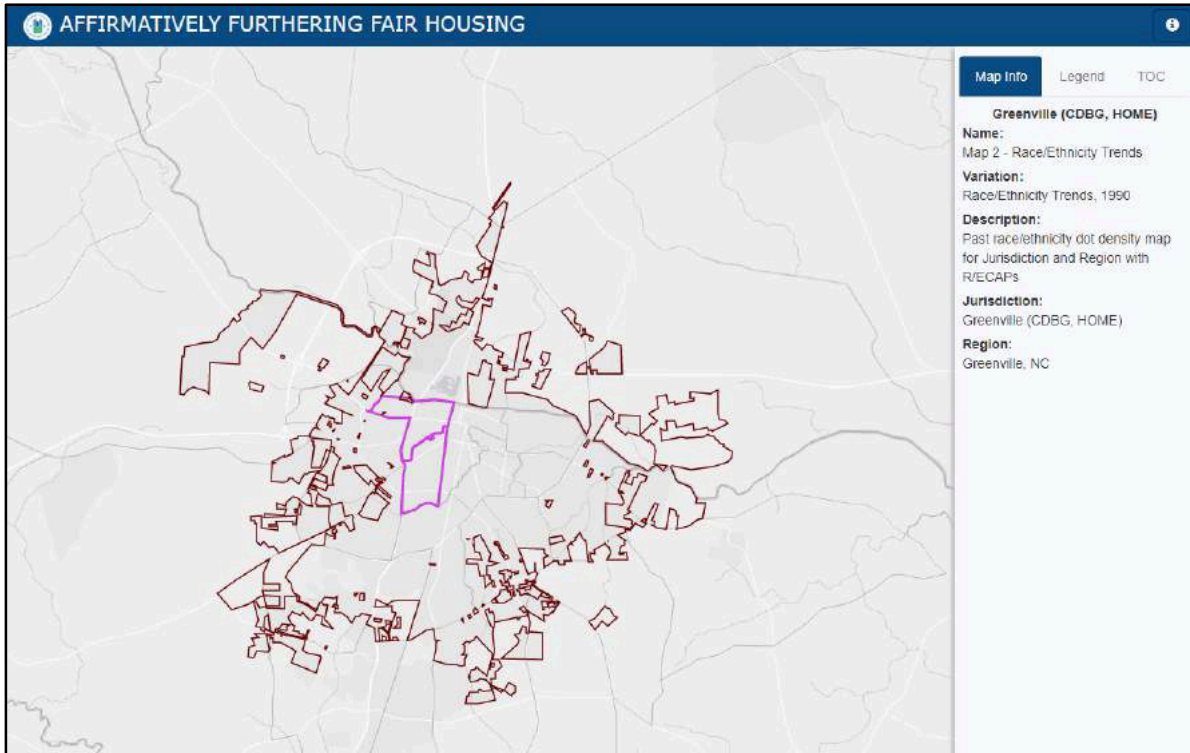
When compared to the city as a whole it is clear that there are some demographic differences within the R/ECAP tracts. The major difference is the high black, non-Hispanic population in the R/ECAP tracts. More than 80 percent of the R/ECAP tract is black, non-Hispanic, which is considerably greater than the black, non-Hispanic population in the city as a whole at 36.65 percent. Families in the R/ECAP tract are also slightly less likely to have children. Foreign-born residents in the R/ECAP are much more likely to come from Mexico than in the general population. Additionally, three national origins are present in the R/ECAP tract that do not show up in the 10 largest national origins for the city: Venezuela, Spain and Peru.

TABLE: Demographic Comparison Between R/ECAP Tract and Jurisdiction				
Race/Ethnicity	R/ECAP	Greenville	Percent Difference	
White, Non-Hispanic	11.81%	55.85%	44.04%	
Black, Non-Hispanic	80.43%	36.65%	-43.78%	
Hispanic	5.46%	4.02%	-1.44%	
Asian or Pacific Islander, Non-Hispanic	0.73%	2.25%	1.52%	
Native American, Non-Hispanic	0.36%	0.29%	-0.07%	
Other, Non-Hispanic	0.03%	0.17%	0.14%	
Family Type	R/ECAP	Greenville	Percent Difference	
Families with Children	42.57%	47.87%	5.30%	
National Origin	R/ECAP		Greenville	
	Country	%	Country	%
#1 Country of Origin	Mexico	1.70%	India	0.76%
#2 Country of Origin	Venezuela	0.50%	Mexico	0.40%
#3 Country of Origin	Spain	0.26%	El Salvador	0.33%
#4 Country of Origin	Peru	0.16%	China*	0.28%
#5 Country of Origin	China*	0.13%	Korea	0.22%
#6 Country of Origin	Japan	0.11%	Canada	0.22%
#7 Country of Origin	El Salvador	0.04%	Taiwan	0.19%
#8 Country of Origin	<i>Null</i>	0.00%	Egypt	0.18%
#9 Country of Origin	<i>Null</i>	0.00%	Japan	0.17%
#10 Country of Origin	<i>Null</i>	0.00%	Guatemala	0.17%
Source: American Community Survey 5-Year Estimates *Excluding Hong Kong and Taiwan				

c. Describe how R/ECAPs have changed over time in the jurisdiction and region (since 1990).

According to the HUD provided maps, there have been shifts in R/ECAP tracts since 1990. In 1990, there were only two identified R/ECAP tracts. These tracts are labeled “1” and “2” in the previous map. The following map displays R/ECAP tracts in 1990.

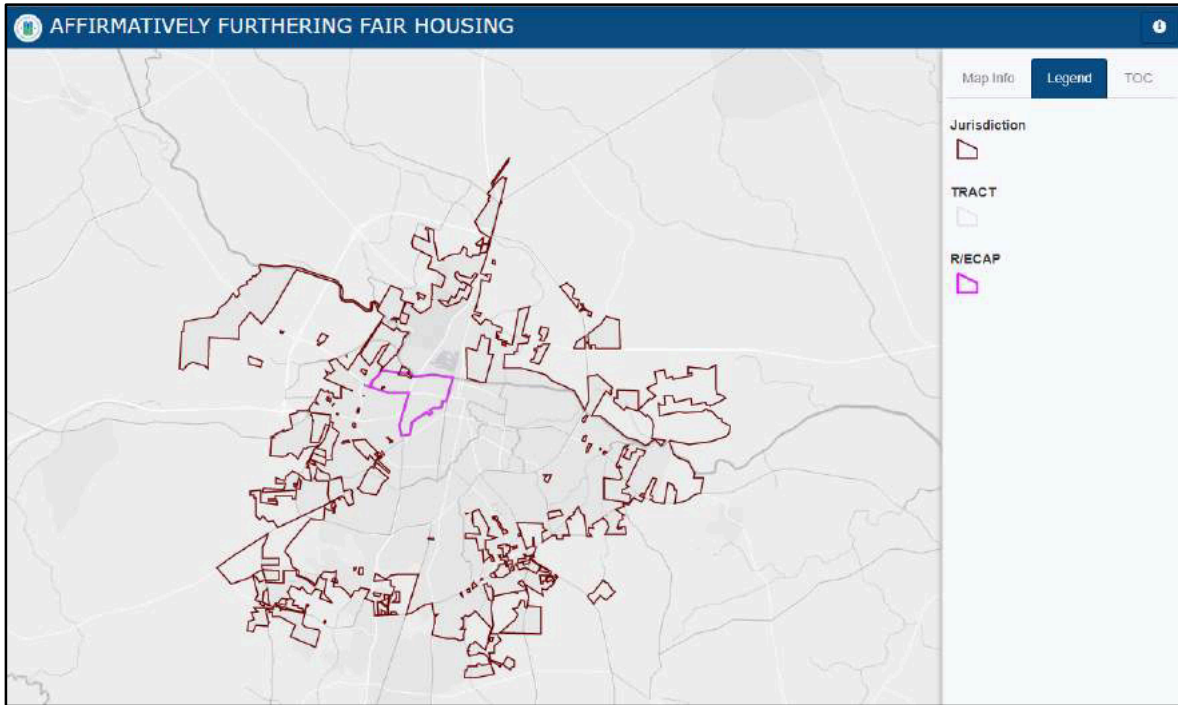
MAP: R/ECAP Tracts, 1990



Source: HUD

In 2000, data from Greenville identified only one R/ECAP. This R/ECAP was previously identified in 1990 (37147000701) and was previously labeled “2.” The following map displays the R/ECAP tract in 2000.

MAP: R/ECAP Tracts, 2000



Source: HUD

2. Additional Information

a. **Beyond the HUD-provided data, provide additional relevant information, if any, about R/ECAPs in the jurisdiction and region affecting groups with other protected characteristics.**

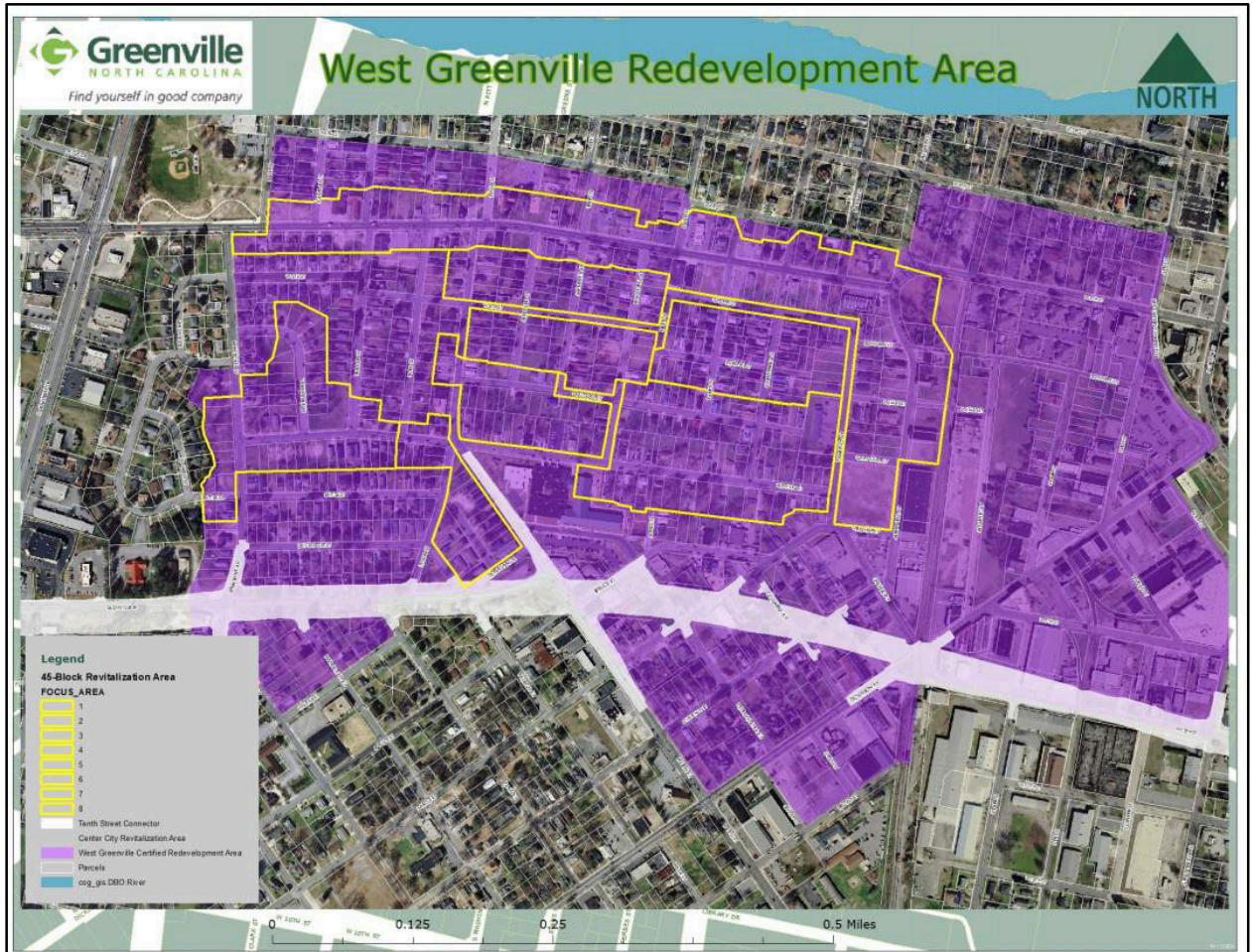
There is no further information about groups with protected characteristics in the jurisdictions R/ECAP tract.

b. **The program participant may also describe other information relevant to its assessment of R/ECAPs, including activities such as place-based investments and geographic mobility options for protected class groups.**

The city’s 2016-2017 Annual Action Plan included targeted redevelopment areas that focused on improving areas with low economic opportunities. In particular, the West Greenville Redevelopment Area includes a significant portion of a R/ECAP tract (census

tract 37147000701). Additionally, the city has increased investment in the R/ECAP tract to the north of the Tar River (census tract 3714000800). The following map displays the planned redevelopment area in West Greenville.

MAP: West Greenville Redevelopment Area



Source: 2016-2017 Greenville Annual Action Plan

3. Contributing Factors of R/ECAPs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of R/ECAPs.

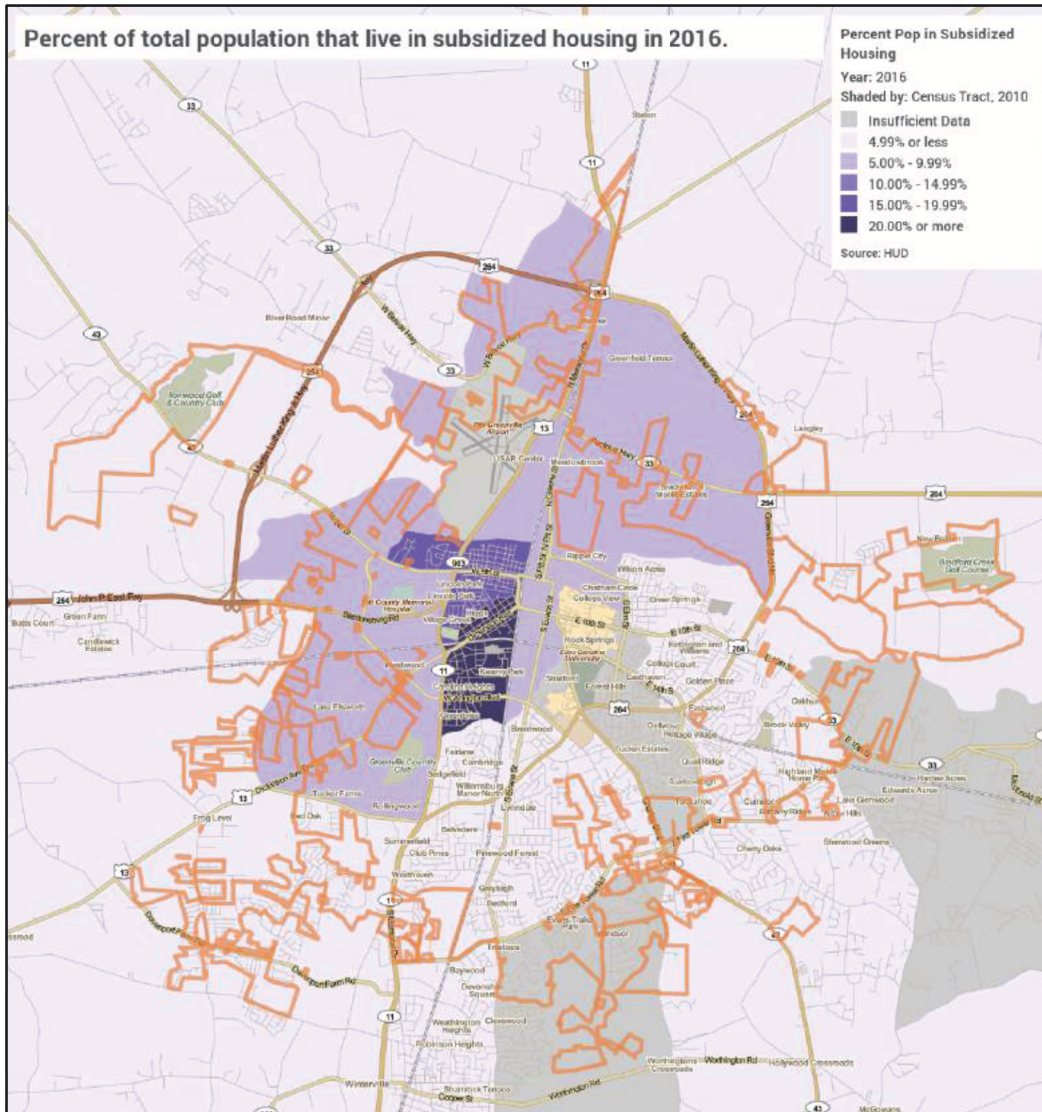
- Community opposition
- Deteriorated and abandoned properties
- Displacement of residents due to economic pressures
- Lack of community revitalization strategies
- Lack of local or regional cooperation
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Land use and zoning laws
- Location and type of affordable housing
- Loss of Affordable Housing
- Occupancy codes and restrictions
- Private discrimination
- Source of income discrimination
- Other

Due to the correlation between segregation and R/ECAP tracts, many of the factors here mirror those in the previous section on segregation.

Rising housing costs can lead to ***displacement of residents due to economic pressures***. As the cost of housing rises, it can push out low-income residents, particularly renters who do not see rising housing costs as an increase in the value of their investment. When income is strongly linked to race or ethnicity this can lead to racial and ethnic segregation. Low-income residents gather together along racial and ethnic lines and are priced out of more affluent areas.

The ***location and type of affordable housing*** can further segregation in ways that are similar to the above points. Subsidized housing can be pushed into certain neighborhoods or census tracts, and if income is correlated with race or ethnicity that can create segregation. The R/ECAP tract in Greenville has an inordinately high rate of subsidized housing. In 2015, more than 30 percent of the population of the R/ECAP tract received housing subsidies, which is considerably higher than the city average of 4.54 percent. The following map displays the populations who live in subsidized housing. Clearly the areas that have a high black, non-Hispanic population receive more subsidized housing than other areas of the city and this may be contributing to the maintenance of the R/ECAP.

MAP: Percent Living in Subsidized Housing



Source: American Community Survey via PolicyMap

III. Disparities in Access to Opportunity

1. Analysis

In order to determine disparities with access to opportunity, HUD provides indices that measure a number of social and economic indicators in the community. According to HUD, “a higher score on each of the indices would indicate: lower neighborhood poverty rates; higher levels of school proficiency; higher levels of labor engagement; closer proximity to jobs; lower transportation costs; closer access to public transportation; and greater neighborhood environmental quality (i.e., lower exposure rates to harmful toxins).”

The following tables display the HUD-provided indices for the jurisdiction and region for the total population and the populations below the poverty level.

TABLE: Opportunity Indicators - Greenville							
Total Population	Low Poverty	School Proficiency	Labor Market	Transit	Low Transportation Cost	Jobs Proximity	Environmental Health
White	64.78	38.68	59.43	64.25	44.06	55.60	58.62
Black	39.92	26.16	44.82	66.28	46.36	64.08	49.67
Hispanic	50.53	34.28	51.34	60.98	42.06	60.61	63.88
Asian or Pacific Islander	61.93	34.20	61.63	66.34	45.26	60.95	52.64
Native American	51.41	33.78	48.20	67.19	46.32	59.22	49.57
Population Below Poverty Line	Low Poverty	School Proficiency	Labor Market	Transit	Low Transportation Cost	Jobs Proximity	Environmental Health
White	56.22	36.59	50.89	73.10	50.69	60.94	50.15
Black	30.94	19.68	39.82	65.61	47.34	61.61	45.43
Hispanic	35.39	24.60	44.88	58.58	41.06	61.61	65.57
Asian or Pacific Islander	72.32	48.00	53.32	66.12	45.80	46.92	49.07
Native American	29.00	1.00	15.00	52.00	27.00	52.83	85.00

Source: American Community Survey 5-Year Estimates, Great Schools, Common Core of Data, School Attendance Boundary Information Systems, Location Affordability Index, Longitudinal Employer-Household Dynamics, National Air Toxics Assessment

TABLE: Opportunity Indicators - Region							
Total Population	Low Poverty	School Proficiency	Labor Market	Transit	Low Transportation Cost	Jobs Proximity	Environmental Health
White	55.50	40.65	55.12	44.31	32.68	55.04	75.13
Black	37.02	28.21	41.72	50.28	35.35	65.44	69.78
Hispanic	39.12	38.04	41.85	45.84	29.85	64.04	78.35
Asian or Pacific Islander	60.61	37.01	62.13	58.48	39.93	59.79	66.92
Native American	47.10	35.49	48.14	48.04	34.68	59.24	68.91
Population Below Poverty Line	Low Poverty	School Proficiency	Labor Market	Transit	Low Transportation Cost	Jobs Proximity	Environmental Health
White	52.09	36.21	49.23	59.11	42.06	54.56	65.88
Black	29.45	24.62	36.32	48.97	35.27	53.88	68.32
Hispanic	23.14	20.99	28.76	55.78	28.85	38.61	80.49
Asian or Pacific Islander	73.28	48.67	57.92	62.61	43.10	48.12	56.45
Native American	21.67	23.67	29.00	34.00	25.00	61.15	80.33

Source: American Community Survey 5-Year Estimates, Great Schools, Common Core of Data, School Attendance Boundary Information Systems, Location Affordability Index, Longitudinal Employer-Household Dynamics, National Air Toxics Assessment

a. Education

- i. For the protected class groups HUD has provided data, describe any disparities in access to proficient schools in the jurisdiction and region.**

The School Proficiency Index measures the proficiency of elementary schools and is determined by the performance of 4th graders on state exams. Index scores are 1-100, with a higher score meaning a higher-ranked school system as compared to a lower score meaning a lower-ranked school system.

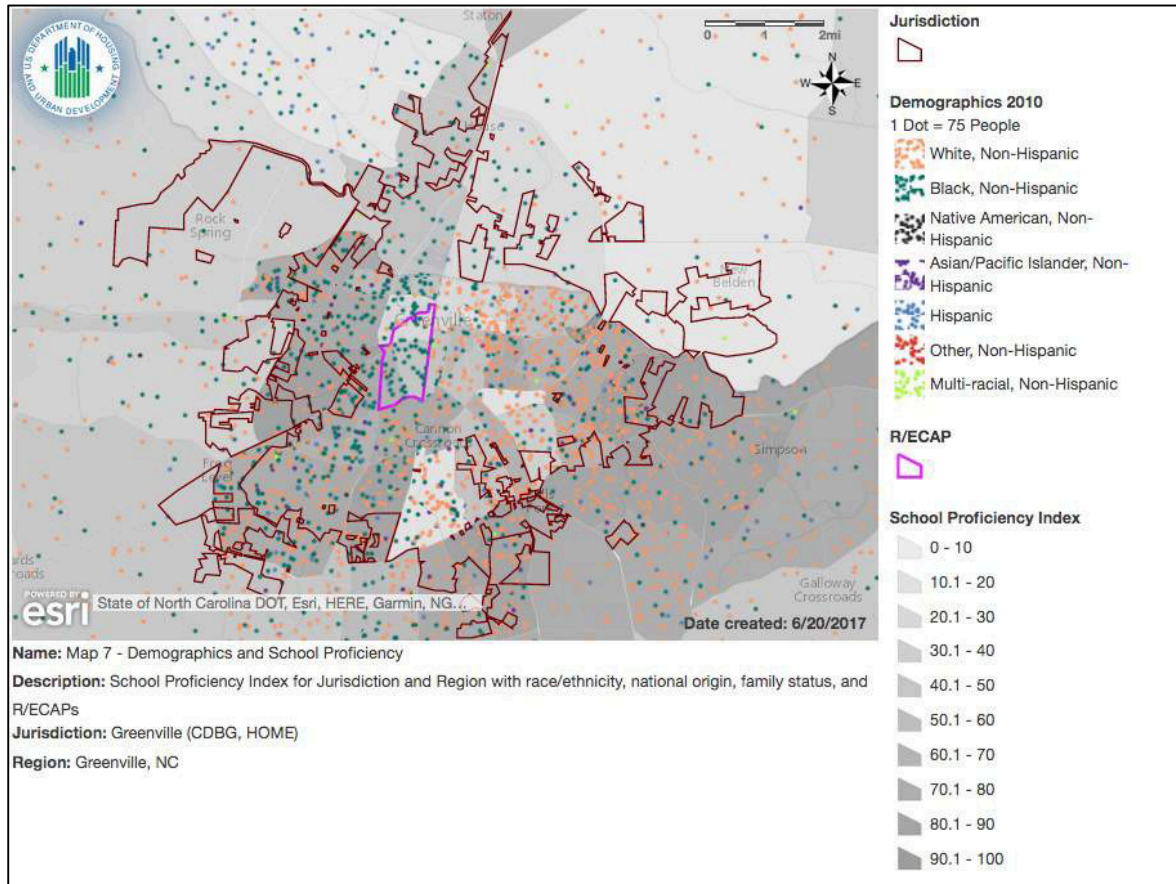
Overall, within Greenville, the school proficiency index is closely similar across racial and ethnic demographics, though the scores are fairly low. For the total population in the city, white, non-Hispanic residents have the highest score of 38.68 and black, non-Hispanics have the lowest score of 26.16. For the population below the poverty line, there is considerably more variety, Asian or Pacific Islanders have the highest score with 48.00 and the Native American populations have the lowest score with 1.00.

In the region, scores are somewhat similar for the total population. Again, the white, non-Hispanic population has the highest score with 40.65 and the black, non-Hispanic

population has the lowest score with 28.21. For the population below the poverty line, the Asian or Pacific Islander population has the highest score with 48.67 and the Hispanic population has the lowest score with 20.99.

The following map displays the School Proficiency Index in Greenville. The census tracts with the lowest scores tend to be in the north and west parts of the city.

HUD Map 7 – Demographics and School Proficiency



Source: HUD

- ii. For the protected class groups HUD has provided data, describe how the disparities in access to proficient schools relate to residential living patterns in the jurisdiction and region.

Within Greenville, there is only one protected group that appears to have disparities in access to proficient schools. The black, non-Hispanic population generally has less access to proficient schools than the other racial or ethnic groups. The lowest score belongs to the Native American, non-Hispanic population below the poverty level but this population is incredibly small.

- iii. **Informed by community participation, any consultation with other relevant government agencies, and the participant’s own local data and local knowledge, discuss programs, policies, or funding mechanisms that affect disparities in access to proficient schools.**

According to the Greenville Analysis of Impediments research was completed on the location of rental properties in the jurisdiction. The research found that most listings included inclusive descriptions that highlighted close proximities to schools. It is incredibly important that those living in rental housing have access to proficient schools because quality education is a gateway to economic opportunities leading to stability and home ownership. In this same report, Greenville recognized the need for further investment in proficient schools and began shifting funds from West Greenville into the northern part of the city where four schools are underachieving.

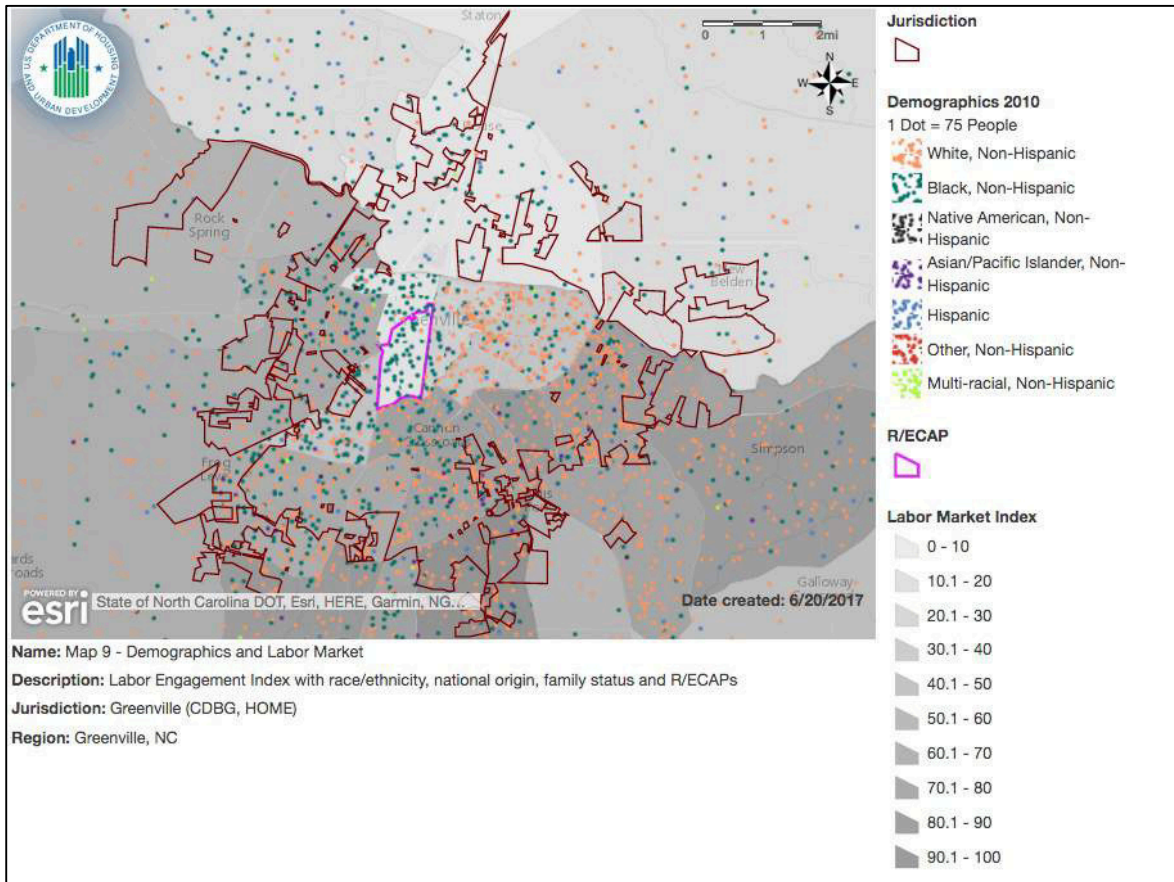
b. Employment

i. For the protected class groups HUD has provided data, describe any disparities in access to jobs and labor markets by protected class groups in the jurisdiction and region.

Disparities in access to jobs and labor markets can be identified by analyzing the Labor Market Index and Jobs Proximity Index in the jurisdiction. The Labor Market Index is a measure of unemployment rate, labor-force participation rate and the percent of the population (more than 25 years old) with a bachelor's degree. The Job Proximity Index measures the physical distance between an individual's home and job, based on race. These two indices provide a snapshot of employment opportunity disparities in the region. The indices are scored 1-100 with a low value indicating lower access and a higher value indicated better access.

Within Greenville for the total population there are some differences in the Labor Market Index between race and ethnic groups. The black, non-Hispanic population has the lowest score with 44.82 and the Asian or Pacific Islander, non-Hispanic population has the highest score with 61.63. For the population below the poverty line, there is more diversity in Labor Market Index Scores. The Native American, non-Hispanic population has the lowest score with 15.00 and the highest score is again the Asian or Pacific Islander, non-Hispanic population with a score of 53.32. The following map displays the geographic distribution of the Labor Market Index.

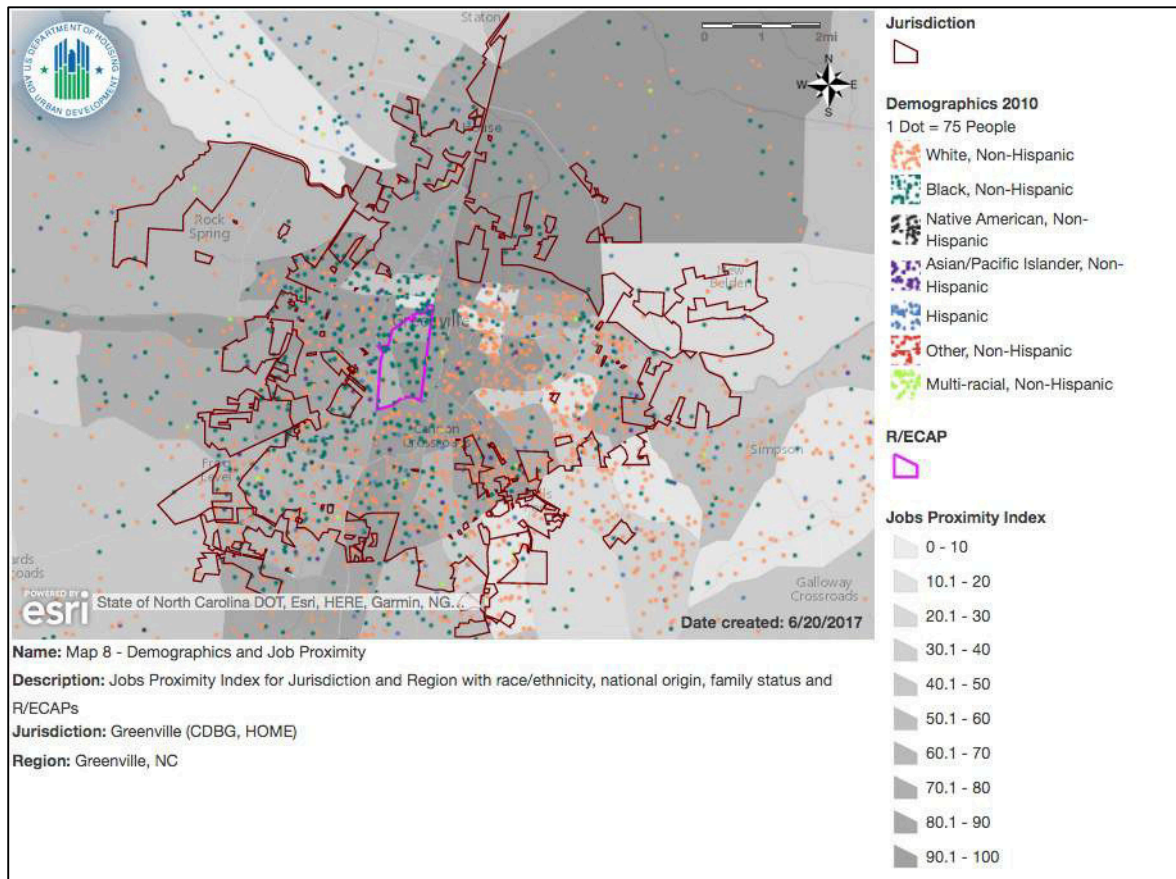
HUD Map 9 – Demographics and Labor Market



Source: HUD

The Jobs Proximity Index in the city is closely similar for the population as a whole within Greenville. The white, non-Hispanic population has the lowest score with 55.60 and the black, non-Hispanic population has the highest Jobs Proximity Index score with 64.08. For the population below the poverty level the scores are similar. The black, non-Hispanic and Hispanic populations both have the highest score with 61.61 and the Asian or Pacific Islander population has the lowest score with 49.92. The following map displays the geographic distribution of the Jobs Proximity Index.

HUD Map 8 – Demographics and Job Proximity



Source: HUD

ii. For the protected class groups HUD has provided data, describe how disparities in access to employment relate to residential living patterns in the jurisdiction and region.

The Labor Market Index is significantly linked to residential living patterns in the jurisdiction. Residents who live near the northern and western parts of the city have lower index scores, this area includes the R/ECAP tract previously identified. There is less of a geographic link to Jobs Proximity Index scores. There are some tracts with lower Jobs Proximity Index scores but they are distributed more evenly throughout the jurisdiction, though the eastern portion of the city generally has lower scores.

iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to employment.

The 2015-2016 Greenville CAPER recognizes the need for employment opportunities for all residents. In order to reduce poverty, the city is preserving housing stock that is occupied by low-income households, which preserves neighborhoods and employment opportunities for residents. Employment opportunities near residential neighborhoods is particularly important for low-income residents.

The 2013-2018 Consolidated Plan recognized the need for suitable employment in order to reduce poverty. To assist with this, Community Development Block Grant funding allows transitional housing providers (i.e. Greenville Community Shelter) to assist families with job training and educational programs. These programs focus on Certified Redevelopment Areas in Greenville with very high poverty rates and where the vast majority of the population is black, non-Hispanic.

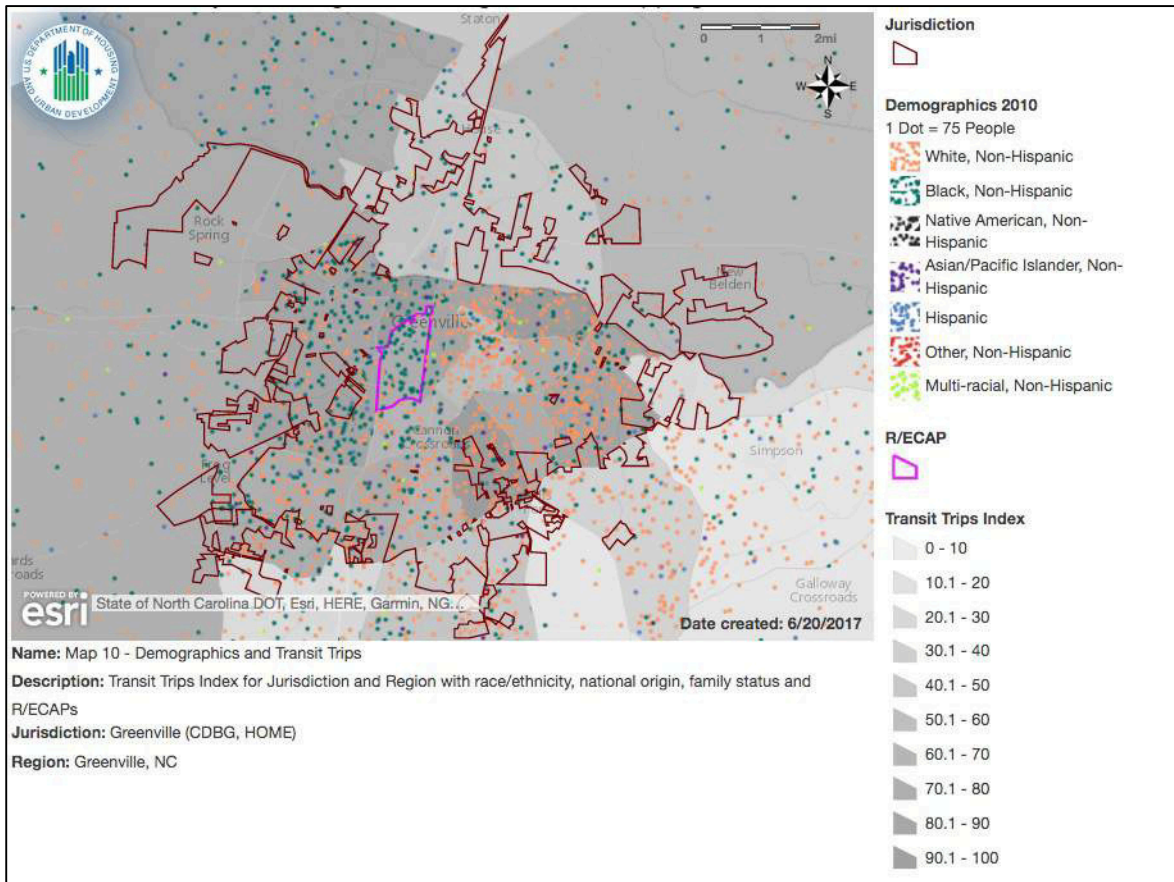
c. Transportation

- i. For the protected class groups HUD has provided data, describe any disparities in access to transportation related to costs and access to public transit in the jurisdiction and region.**

Disparities in access to transportation related to costs and access to public transportation can be identified by analyzing the Low Transportation Cost Index and Transit Index in Greenville. The Transit Index measures how often low-income families use public transportation and the Low Transportation Cost Index measures the cost of transportation. The indices are scored 0-100 with a low value indicating high use of public transportation and high transportation cost and a higher value indicates low use of public transportation and low transportation cost.

Within Greenville for the total population there is very little difference in the Transit Index between race and ethnic groups. The Hispanic population has the lowest score with 60.98 and the Native American, non-Hispanic population has the highest score with 67.19. For the population below the poverty line the scores vary slightly more. The lowest score is the Native American, non-Hispanic population with a score of 52.00, and the highest score is the white, non-Hispanic population with 73.10. The following map displays the Transit Index by race and ethnicity in Greenville.

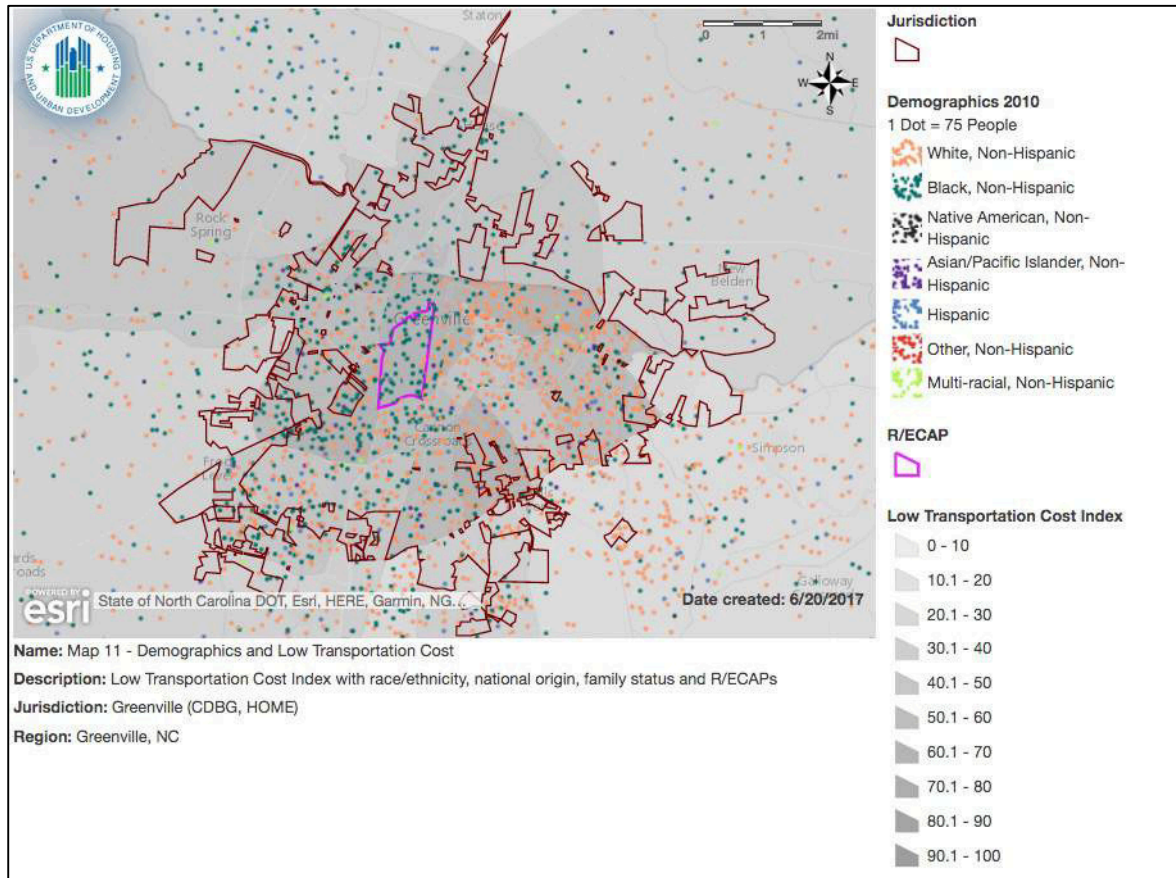
MAP 10 – Demographics and Transit Trips



Source: HUD

The Low Transportation Cost Index in the city also displays relative consistency for the population as a whole. The Hispanic population has the lowest score with 42.06 and the black, non-Hispanic population has the highest score with 46.36. For the population below the poverty level there is slightly more variety. The Native American, non-Hispanic population has the lowest score with 27.00 and the highest score is the white, non-Hispanic population with 50.69. The following map displays the Low Transportation Cost Index by race and ethnicity in Greenville.

HUD Map 11 – Demographics and Low Transport Cost



Source: HUD

ii. For the protected class groups HUD has provided data, describe how disparities in access to transportation related to residential living patterns in the jurisdiction and region.

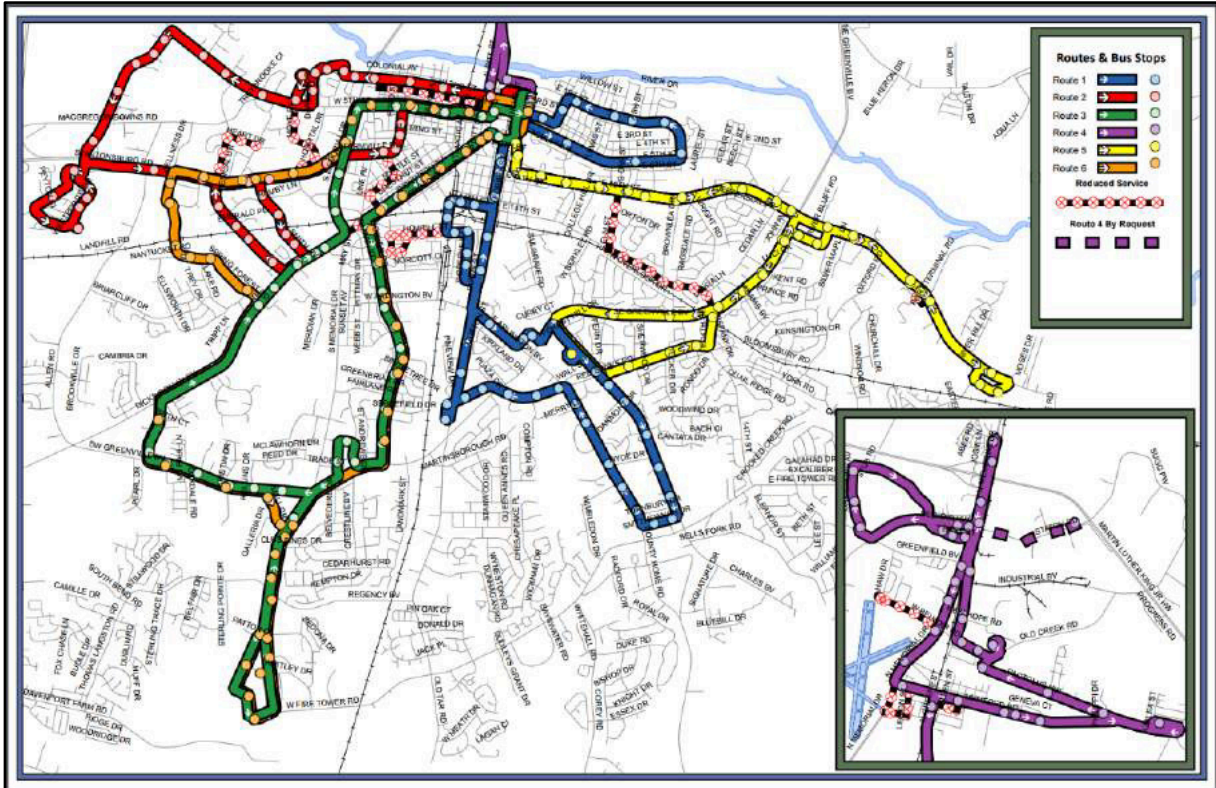
There are no protected classes that face disparities in access to transportation related to living patterns in the jurisdiction. In general, index scores are higher toward the center of town compared to the outskirts.

iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to transportation.

A robust public transportation system is necessary to reduce disparities in access to opportunities within a jurisdiction. Low-income families are more dependent on public transportation and if there isn't access to public transportation then those families have reduced employment and educational opportunities. The Greenville Area Transit (GREAT) system provides bus service throughout the city. In addition to providing buses throughout the city they have an explicit policy "to provide equal opportunities to all people who participate in or who are the recipients of GREAT services. GREAT is committed to ensuring that no person is excluded from participation in, or denied the benefits of the transit services, which are provided without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act."

There are areas in which the public transportation system could be improved, including an expansion of the times that buses are available. Currently, service is not available on Sunday, certain holidays (New Year's Day, Independence Day, Thanksgiving Day, Memorial Day, Labor Day or Christmas Day), after 7 p.m. on weekdays and after 6 p.m. on Saturdays. Unfortunately, many low-income jobs operate outside of these service hours, and residents may be forced to use more expensive or time-consuming forms of transportation, or possibly lose out on employment and educational opportunities. Additionally, discount fares are available for elderly and disabled residents but this program could be expanded to low-income families to reduce the cost burden they face. The following is a map of the service route for the GREAT system.

MAP: GREAT Service Route



Source: Greenville City Government, www.greenville.gov

According to the 2011-2015 American Community Survey, only 1.9 percent (814) of the workers used public transportation as their primary way to commute to work in Greenville. By far, the most common means of transportation is personal vehicle driven alone; the second most common is personal vehicle carpool. The following table displays means of transportation to work within Greenville.

TABLE: Means of Transportation to Work (Over 16 years old)		
	#	%
Car, truck, or van – Drove Alone	35,401	83.6%
Car, truck, or van – Carpooled	3,164	7.5%
Public Transportation	814	1.9%
Taxicab	76	0.2%
Motorcycle	56	0.1%
Bicycle	153	0.4%
Walked	1,330	3.1%
Other means	138	0.3%
Worked at home	1,212	2.9%

Source: American Community Survey 5-Year Estimates (2011-2015)

Commuters who use public transportation tend to be significantly different than the total population. They are much more likely to be black or African American, low-income and live in rental units. The following table displays select demographics for the population that uses public transportation to commute to work and the total population.

TABLE: Select Demographics of the Total Population and the Population that Uses Public Transportation for Work		
Race/Ethnicity	Population That Uses Public Transportation	Total Population
White	25.3%	60.2%
Black or African American	71.6%	33.4%
American Indian and Alaska Native	0.0%	0.2%
Asian	1.5%	3.3%
Native Hawaiian or Other Pacific Islander	0.0%	0.0%
Some Other Race	1.6%	1.5%
	Population That Uses Public Transportation	Total Population
Less than \$10,000	18.2%	22.9%
\$10,000 to \$14,999	29.7%	12.1%
\$15,000 to \$24,999	38.7%	15.4%
Greater than \$25,000	13.4%	49.7%
Median Earnings	\$15,357	\$24,700
	Population That Uses Public Transportation	Total Population
Owner-Occupied Housing Units	1.0%	35.9%
Renter-Occupied Housing Units	99.0%	64.1%
Source: American Community Survey 5-Year Estimates (2011-2015) S0801		

d. Access to Low Poverty Neighborhoods

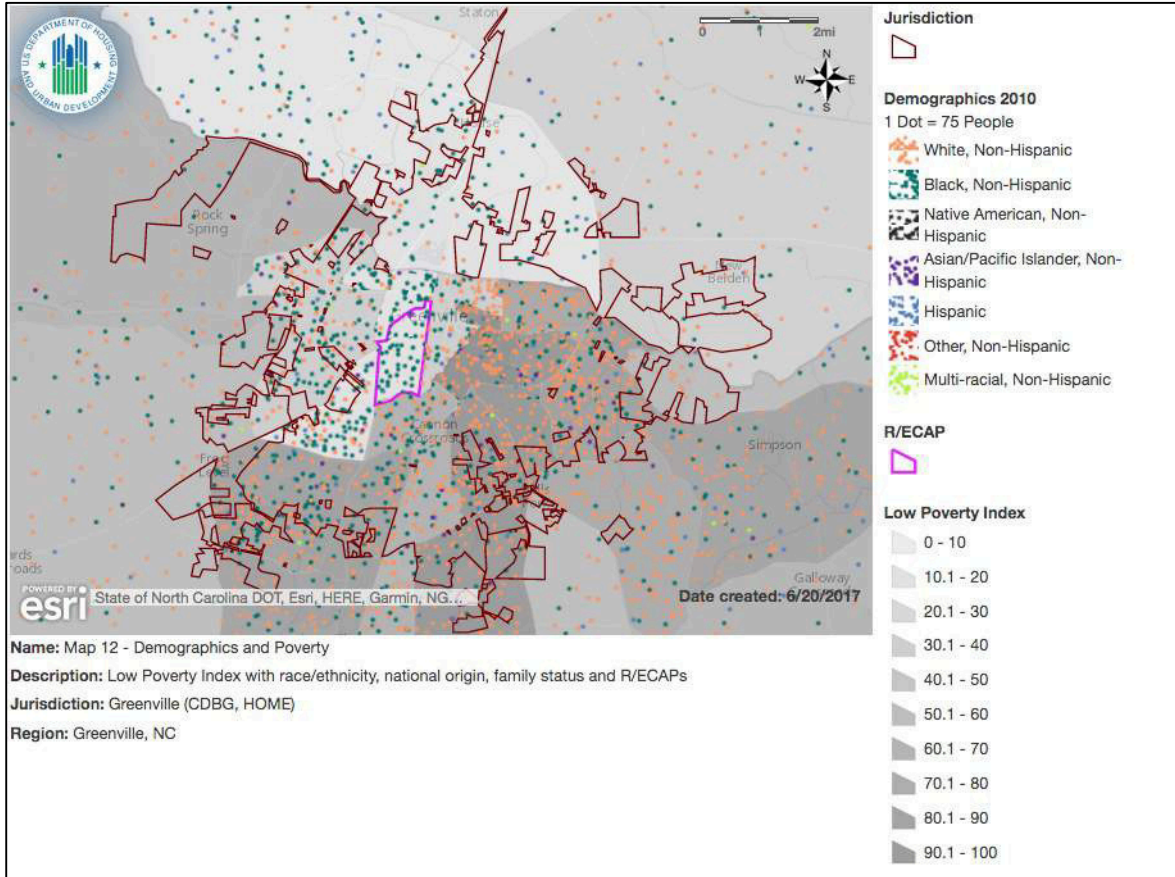
i. For the protected class groups HUD has provided data, describe any disparities in access to low poverty neighborhoods in the jurisdiction and region.

The HUD-provided data includes the Low Poverty Index, which uses rates of family poverty by household to measure exposure to poverty. A higher score generally indicates less exposure to poverty and a lower score generally indicates high exposure to poverty.

In Greenville, the Low Poverty Index scores by race/ethnicity are grouped into three groups. The relatively high score group is the white, non-Hispanic and the Asian or Pacific Islander, non-Hispanic populations with scores of 64.78 and 61.93, respectively. The middle score group includes the Hispanic population and the Native American, non-Hispanic population with 50.53 and 51.41, respectively. Finally, the low score group includes only the black, non-Hispanic population with a score of 39.92.

Unsurprisingly, scores on the Low Poverty Index are generally lower across all racial/ethnic demographics for the population below the federal poverty line. The two highest scores are again the Asian or Pacific Islander, non-Hispanic and white, non-Hispanic populations with 72.32 and 56.22. The remaining three racial/ethnic groups are significantly lower. The black, non-Hispanic population has a score of 30.94, the Hispanic population has a score of 35.39, and the Native American, non-Hispanic population has the lowest score with 29.00. The following map displays the Low Poverty Index by race/ethnicity in the jurisdiction.

HUD Map 12 – Demographics and Poverty



Source: HUD

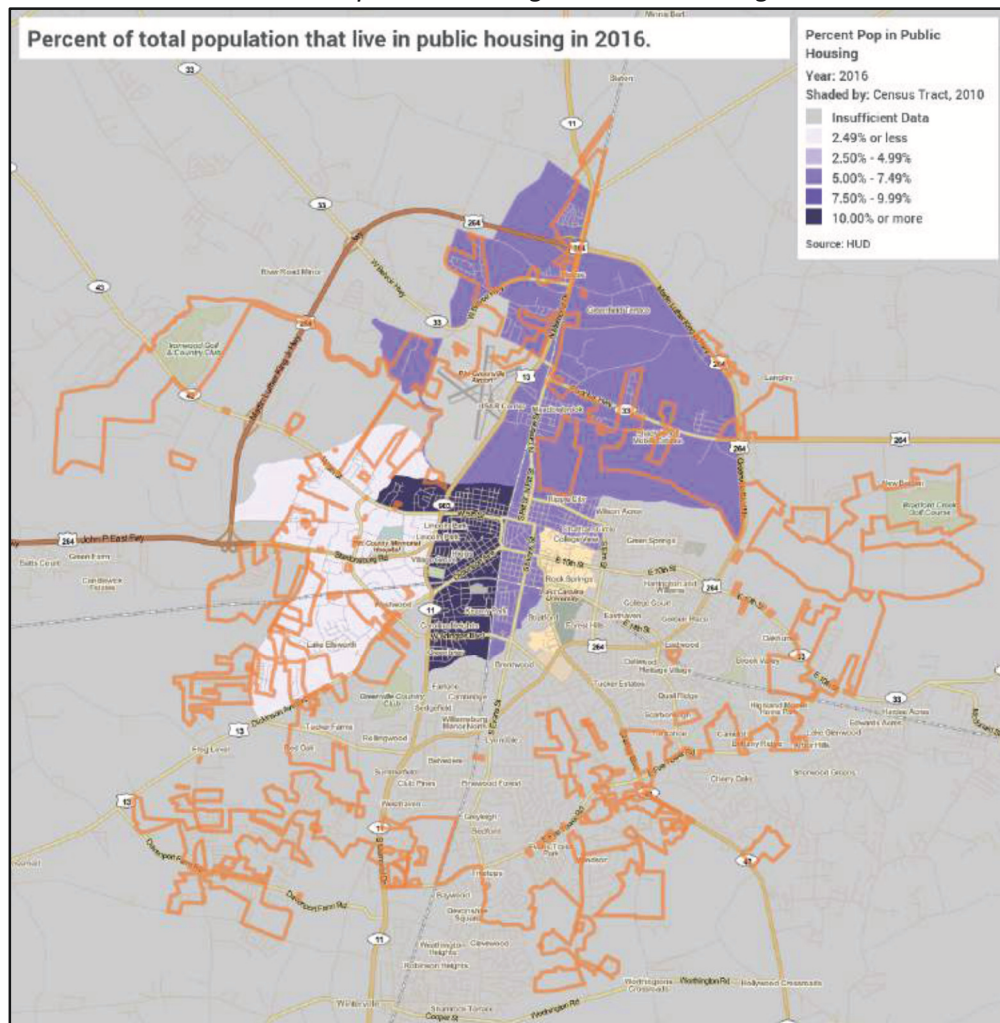
- ii. For the protected class groups HUD has provided data, describe how disparities in access to low poverty neighborhoods relate to residential living patterns of those groups in the jurisdiction and region.

According to the HUD-provided map and table the western part of the city, including the R/ECAP tract, has the lowest score on the Low Poverty Index. This area has a relatively high black, non-Hispanic population which points to a link between race and poverty within the city. Living on the west side or near the northern airport significantly increases the chance a resident will have reduced access to low poverty areas.

iii. **Informed by community participation, any consultation with other relevant government agencies, and the participant’s own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to low poverty neighborhoods.**

The location of public housing can contribute to disparities in access to low poverty neighborhoods. Public housing policies can often consolidate poverty into specific neighborhoods and limit the ability of people to live in low poverty areas. Public housing, and the issues surrounding it, are discussed more thoroughly elsewhere in this document. The following map displays the percentage of the population in public housing by census tract. The areas with high public housing use generally correlate with areas with a Low Poverty Index score.

MAP: Population Living in Public Housing



Source: HUD via PolicyMap

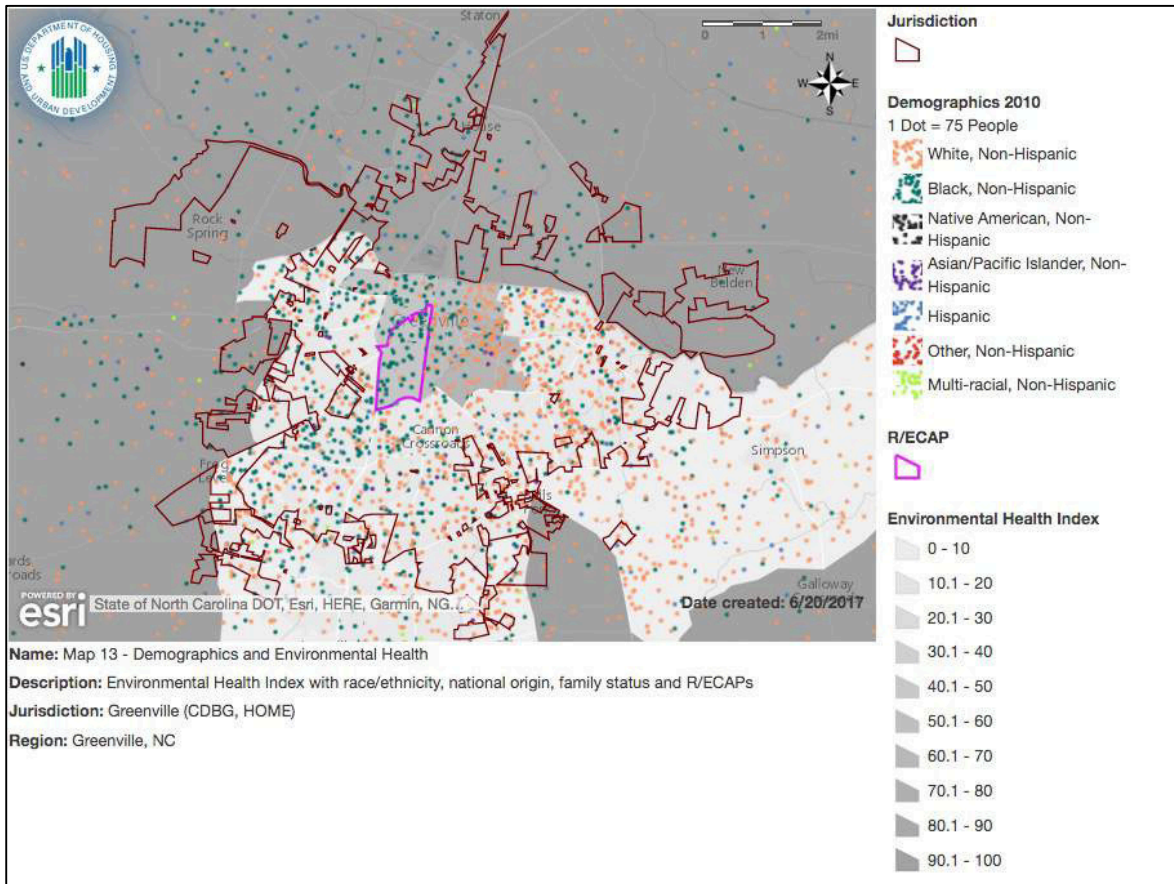
e. Access to Environmentally Healthy Neighborhoods

i. For the protected class groups HUD has provided data, describe any disparities in access to environmentally healthy neighborhoods in the jurisdiction and region.

In order to determine disparities in access to environmentally healthy neighborhoods we can compare Environmental Health Index between racial and ethnic groups. The Environmental Health Index measures exposure based on EPA estimates of air quality in terms of carcinogenic, respiratory and neurological toxins. A high score means that the neighborhood is environmentally healthy while a low score means that the neighborhood is not as environmentally healthy.

Within Greenville, there is very little variation among racial/ethnic groups in Environmental Health Index scores in the total population. Each racial and ethnic group has a moderate score. The highest score is the Hispanic population, with 63.88, and the lowest score is the Native American, non-Hispanic population with a score of 49.57. For the population below the poverty line, the scores are in the same moderate range but show more variation. The Native American, non-Hispanic population has the highest score (85.00) and the black, non-Hispanic population has the lowest score (45.43). The following map displays the Environmental Health Index within the jurisdiction.

HUD Map 13 – Demographics and Environmental Health



Source: HUD

ii. For the protected class groups HUD has provided data, describe how disparities in access to environmentally healthy neighborhoods relate to residential living patterns in the jurisdiction and region.

There are no groups that have noticeably less access to environmentally healthy neighborhoods.

iii. Informed by community participation, any consultation with other relevant government agencies, and the participant’s own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to environmentally healthy neighborhoods.

According to the 2013 Greenville Consolidated Plan the city is continuing to pursue funding from the Lead Grant and the Brownfields Grant to help eliminate environmental hazards in the city. They are specifically focusing on the elimination of hazards within low-income communities.

f. Patterns in Disparities in Access to Opportunity

- i. For the protected class groups HUD has provided data, identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors. Include how these patterns compare to patterns of segregation, integration, and R/ECAPs. Describe these patterns for the jurisdiction and region.**

For the total population in Greenville, the black, non-Hispanic population stands out as having less access to opportunity and greater exposure to adverse factors than other groups in the jurisdiction. The Asian or Pacific Islander, non-Hispanic and white, non-Hispanic populations have greater access to opportunities than other groups in Greenville. There is a similar pattern for the population below the poverty level. Again, the black, non-Hispanic population has the lowest access to opportunities and the Asian or Pacific Islander and white populations have the highest access to opportunities.

The R/ECAP tracts in Greenville have disproportionally high black, non-Hispanic and Hispanic populations. Not only are these tracts racially segregated and pose economic problems, those tracts also have low opportunity indicators.

TABLE: Opportunity Index Score Comparison		
Total Population	Total Opportunity Indicator Score	Average Opportunity Indicator Score
White	358.43	51.20
Black	327.80	46.83
Hispanic	337.09	48.16
Asian or Pacific Islander	384.87	54.98
Native American	341.60	48.80
Population Below the Poverty Line	Total Opportunity Indicator Score	Average Opportunity Indicator Score
White	359.14	51.31
Black	269.83	38.55
Hispanic	276.62	39.52
Asian or Pacific Islander	390.15	55.74
Native American	271.83	38.83
Source: HUD		

- ii. Based on the opportunity indicators assessed above, identify areas that experience: (a) high access; and (b) low access across multiple indicators.**

There are no clear cut “high access” and “low access” census tract blocks in Greenville across multiple indicators, but some patterns can be found. In general, the R/ECAP tracts are low access areas, particularly the R/ECAP to the north that includes the airport. Additionally, tracts on the west side of town appear to be lower access. High access areas include the tracts to the east of the college and along the southern border of the city.

2. Additional Information

- a. **Beyond the HUD-provided data, provide additional relevant information, if any, about disparities in access to opportunity in the jurisdiction and region affecting groups with other protected characteristics.**

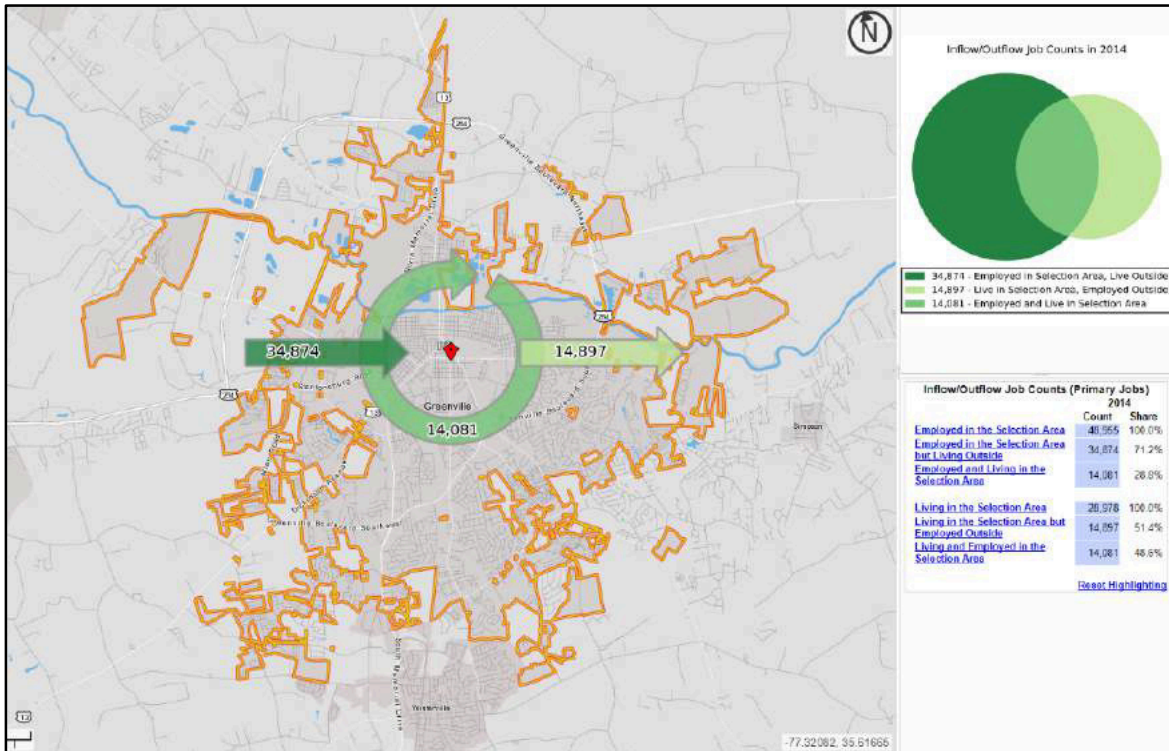
Greenville does not have significant disparities in access to opportunities within the jurisdiction affecting groups with other protected characteristics.

- b. **The program participant may also describe other information relevant to its assessment of disparities in access to opportunity, including any activities aimed at improving access to opportunities for areas that may lack such access, or in promoting access to opportunity (e.g., proficient schools, employment opportunities, and transportation).**

An analysis of commuting patterns within Greenville shows that providing greater housing and employment opportunities within the city can help with transportation issues. Individuals who cannot locate housing near their work must commute significant distances, which increases traffic, pollution, and places a strain on public investments. Long distance commuting also reduces opportunities for non-private vehicle commuting such as public transportation, cycling and walking. As noted earlier, the rate of non-private vehicle commuting is low in Greenville.

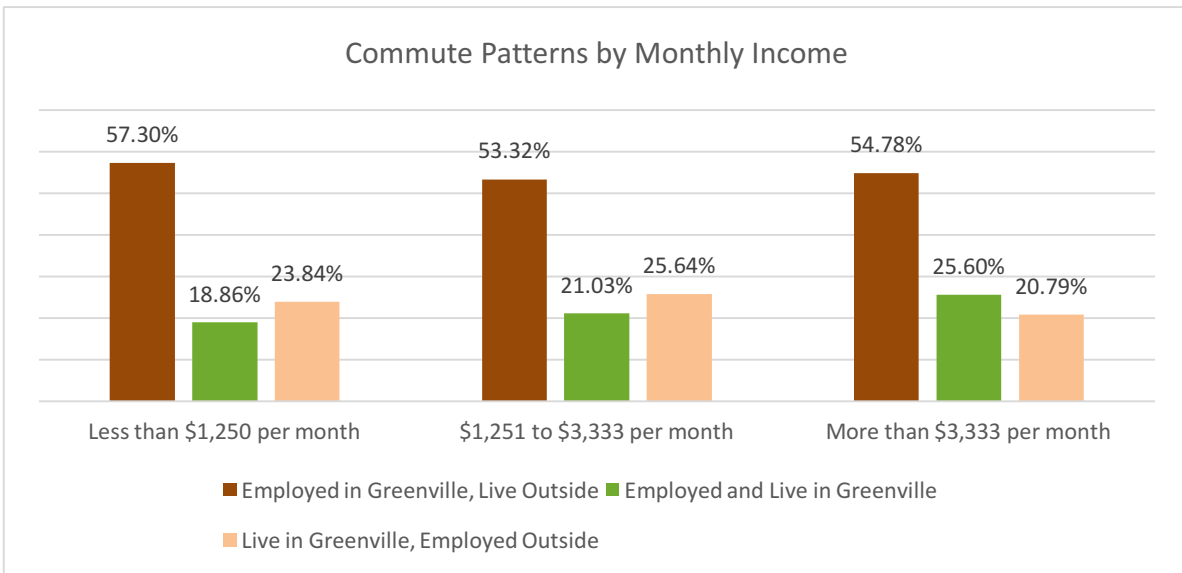
The following map show the commuting patterns for Greenville. The city faces a significant commuting imbalance. More than 70 percent of the workforce lives outside of the city and nearly half of the city's population works outside the city. That means nearly 50,000 have a commuting situation that does not work well with public transportation and adds significantly to the traffic in the city. This points to a demand for a variety of affordable housing options in the city. All other things being equal, residents would rather live near work and shorten commute than drive long distances for work.

MAP: Commuting Patterns



Source: U.S. Census Bureau

When analyzing the commute patterns by monthly income for Greenville there is no clear pattern based on income. This points to a general lack of appropriate housing all income levels. The following table displays 1428 commute patterns by monthly income.



Source: U.S. Census Bureau

3. Contributing Factors of Disparities in Access to Opportunity

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity.

- Access to financial services
- Availability, type, frequency, and reliability of public transportation
- Impediments to mobility
- Lack of access to opportunity due to high housing costs
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Lack of local or regional cooperation
- Land use and zoning laws
- Lending discrimination
- Location and type of affordable housing
- Location of employers
- Location of environmental health hazards
- Location of proficient schools and school assignment policies
- Loss of Affordable Housing
- Occupancy codes and restrictions
- Private discrimination
- Source of income discrimination
- Other

The availability, type, frequency, and reliability of public transportation is an issue in Greenville. A large portion of the working population commutes. Reliable transportation that is available when and where workers need it, particularly low-income workers, is essential to the community.

The *location of employers* and *location and type of affordable housing* are interrelated issues that contribute to disparities in opportunity. Areas with economic opportunities lack the housing necessary for the workforce, which increases commute times and limits opportunities for low-income individuals.

IV. Disproportionate Housing Needs

1. Analysis

a. Which protected class groups (by race/ethnicity and familial status) experience higher rates of housing problems (cost burden, overcrowding, or substandard housing) when compared to other groups for the jurisdiction and region? Which groups also experience higher rates of severe housing cost burdens when compared to other groups?

Race/Ethnicity

According to the HUD-provided data, 43.97 percent of all households in Greenville experience at least one of any of the four housing problems. The race/ethnicity with the highest rate of household problems is the black, non-Hispanic population with 51.82 percent. The Hispanic population has a similar rate of housing problems with 50.24 percent. The race/ethnicity with the lowest rate is the Native American, non-Hispanic population with 32.56 percent but that population is very small with only 43 families in the city. The white, non-Hispanic population has a relatively low rate of household problems with 39.36 percent.

Family Status

Families of five or more face housing problems at a much higher rate than other household types or sizes (58.66 percent). Family households with fewer than five face housing problems at the lowest rate (31.02 percent).

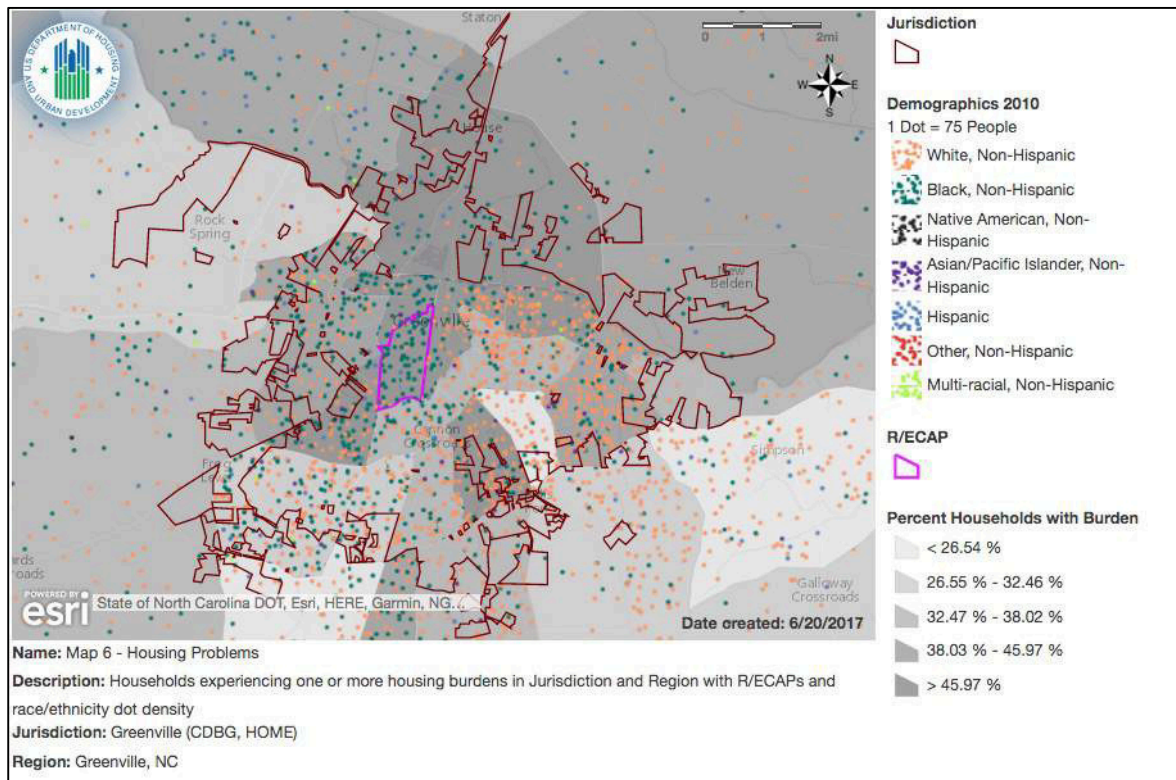
Race/Ethnicity	# with problems	# total households	% with problems
White, non-Hispanic	7,905	20,083	39.36%
Black, non-Hispanic	6,188	11,941	51.82%
Hispanic	520	1,035	50.24%
Asian or Pacific Islander, non-Hispanic	300	839	35.76%
Native American, non-Hispanic	14	43	32.56%
Other, non-Hispanic	250	552	45.29%
<i>Total</i>	<i>15,155</i>	<i>34,470</i>	<i>43.97%</i>
Household Type and Size	# with problems	# total households	% with problems
Family households, <5 people	4,750	15,314	31.02%
Family households, 5+ people	864	1,473	58.66%
Non-family households	9,530	17,664	53.95%

Source: Comprehensive Housing Affordability Strategy (CHAS), 2008-2012

b. Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?

According to the HUD-provided map and data, the areas with a high percentage of households with burden are strongly correlated with the R/ECAPs. Overall, seven census tracts have significantly above average percentage of households with housing problems (more than 45.97 percent), including the three R/ECAP tracts. The following map displays the percentage of households with burden in Greenville.

HUD Map 6 – Housing Problems



Source: HUD

The following table displays select demographic data for the high-burden census tracts. The Theil Index ranges from 0 to 1 and displays information about racial segregation. A score lower than .20 suggests less segregation and a score more than .40 suggests great segregation. Overall, one tract has high segregation (greater than .40) but two tracts are close to that cutoff mark with 0.36 and 0.37. The R/ECAP tracts make up three of the four highest Theil Index scores.

Census Tract	Households with Housing Problems	Theil Index	Black, Non-Hispanic	Hispanic
37147000800	48.86%	0.36	67.70%	15.07%
37147000701	51.97%	0.46	82.81%	4.19%
37147000702	53.06%	0.27	88.48%	3.36%
37147000602	53.95%	0.14	58.57%	1.75%
37147000100	57.73%	0.37	36.11%	3.01%
37147000201	61.59%	0.20	19.47%	4.48%
37147000502	48.85%	0.10	19.86%	4.15%
Greenville	43.97%	--	36.98%	4.11%
Source: Decennial Census 2010				

c. Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing for the jurisdiction and region.

Publicly supported housing in Greenville provides a variety of housing options for the residents of the city. Nearly one-third (30.56 percent) of the publicly supported housing stock is for homes with three bedrooms or more and are suitable for larger families. Approximately 35 percent of the homes are 0 or 1 bedroom, which is more suitable for single individuals or couples without children. Overall, there are appropriate home options for the households that utilize the programs – 881 of the families have children and 1,224 of the households have two bedrooms or more.

Publicly supported housing is primarily through the HCV Program and Public Housing. Of the 1,875 units, 706 (or 37.65 percent) are through the HCV Program and 686 (or 36.59 percent) are Public Housing. Other multifamily programs are the smallest with only 38 units in that program. The following table displays the publicly supported housing by category.

Housing Type	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
	#	%	#	%	#	%	#	%
Public Housing	130	18.92%	231	33.62%	325	47.31%	394	57.35%
Project-Based Section 8	310	68.58%	79	17.48%	56	12.39%	110	24.34%
Other Multifamily	38	86.36%	0	0.00%	0	0.00%	0	0.00%
HCV Program	173	23.67%	341	46.65%	192	26.27%	377	51.57%

Source: HUD, LIHTC Database

d. Describe the differences in rates of renter and owner occupied housing by race/ethnicity in the jurisdiction and region.

According to the 2011-2015 American Community Survey 5-Year Estimates, 34.8 percent of the occupied housing units in Greenville are owner-occupied. There is a correlation between race and housing tenure. White, non-Hispanic and Asian households are much more likely to be homeowners than black or Hispanic households. The following table displays housing tenure in Greenville by race/ethnicity.

TABLE: Housing Tenure by Select Race/Ethnicity		
	Owner-Occupied Housing	Renter Occupied Housing
White	46.3%	53.7%
Black	17.5%	82.5%
Asian	45.7%	54.3%
Hispanic	21.7%	78.3%
Greenville	34.8%	65.2%

Source: 2011-2015 American Community Survey

2. Additional Information

a. **Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the jurisdiction and region affecting groups with other protected characteristics.**

Lending Practices in Greenville

Citywide lending practices were analyzed using data gathered from lending institutions in compliance with the Home Mortgage Disclosure Act (HMDA). The HMDA was enacted by Congress in 1975 and is implemented by the Federal Reserve Board as Regulation C. The intent of the act is to provide the public with information related to financial institution lending practices and to aid public officials in targeting public capital investments to attract additional private sector investments.

Since enactment of the HMDA in 1975, lending institutions have been required to collect and publicly disclose data regarding applicants, including location of the loan (by census tract, county and MSA); income, race and gender of the borrower; the number and dollar amount of each loan; property type; loan type; loan purpose; whether the property is owner-occupied; action taken for each application; and, if the application was denied, the reason(s) for denial. Property types examined include one-to-four family units, manufactured housing and multi-family developments.

HMDA data is a useful tool in accessing lending practices and trends within a jurisdiction. While many financial institutions are required to report loan activities, it is important to note that not all institutions are required to participate. Depository lending institutions – banks, credit unions, and savings associations – must file under HMDA if they hold assets exceeding the coverage threshold set annually by the Federal Reserve Board, have a home or branch office in one or more metropolitan statistical areas (MSA), or originated at least one home purchase or refinancing loan on a one-to-four family dwelling in the preceding calendar year. Such institutions must also file if they meet any one of the following three conditions: status as a federally insured or regulated institution; originator of a mortgage loan that is insured, guaranteed or supplemented by a federal agency; or originator of a loan intended for sale to Fannie Mae or Freddie Mac.

For-profit, non-depository institutions (such as mortgage companies) must file HMDA data if their value of home purchase or refinancing loans exceeds 10 percent of their total loan originations or equals or exceeds \$25 million; they either maintain a home or branch office in one or more MSAs or in a given year execute five or more home purchase, home refinancing, or home improvement loan applications, originations, or loan purchases for

properties located in MSAs; or they hold assets exceeding \$10 million or have executed more than 100 home purchase or refinancing loan originations in the preceding calendar year.

It is recommended that the analysis of HMDA data be tempered by the knowledge that no one characteristic can be considered in isolation, but must be considered in light of other factors. For instance, while it is possible to develop conclusions simply based on race data, it is more accurate when all possible factors are considered, particularly in relation to loan denials and loan pricing. According to the FFIEC, “with few exceptions, controlling for borrower-related factors reduces the differences among racial and ethnic groups.” Borrower-related factors include income, loan amount, lender, and other relevant information included in the HMDA data. Further, the FFIEC cautions that the information in the HMDA data, even when controlled for borrower-related factors and the lender, “is insufficient to account fully for racial or ethnic differences in the incidence of higher-priced lending.” The FFIEC suggests that a more thorough analysis of the differences may require additional details from sources other than HMDA about factors including the specific credit circumstances of each borrower, the specific loan products that they are seeking, and the business practices of the institutions that they approach for credit.

The following analysis is provided for the city of Greenville, N.C., summarizing 2015 HMDA data (the most recent year for which data are available), and data between 2007 and 2015 where applicable. Due to HMDA data’s geographic constraints at the municipal jurisdiction level, the geography utilized includes all census tracts that fall within the boundaries of Greenville. Where specific details are included in the HMDA records, a summary is provided below for loan denials including information regarding the purpose of the loan application, race of the applicant and the primary reason for denial. For the purposes of analysis, this report will focus only on the information available and will not make assumptions regarding data that is not available or was not provided as part of the mortgage application or in the HMDA reporting process.

2015 City Overview

In 2015, Greenville residents applied for roughly 4,600 home loans to purchase, refinance or make home improvements for a single-family home – not including manufactured homes. Of those applications, more than 2,460 or 54 percent were approved and originated, an increase of more than 320 originations from 2014 and a percentage increase of 15 percent, below the national rate of 22 percent. Of the remaining 2,140 applications, approximately 730 or 16 percent of all applications were denied for reasons identified

below. It is important to note that financial institutions are not required to report reasons for loan denials, although many do so voluntarily. Also, while many loan applications are denied for more than one reason, HMDA data reflects only the primary reason for the denial of each loan. The balance of the approximately 1,400 applications that were not originated or denied were closed for one reason or another, e.g., a) the loan was approved but not accepted by the borrower; b) the application was closed because of incomplete information or inactivity by the borrower; or c) in many instances the application may have been withdrawn by the applicant.

Table: Disposition of Application by Loan Type and Purpose, 2015 Single-family Homes (excluding manufactured homes)				
	Loan Type	Home Purchase	Refinance	Home Improvement
Total Applications				
	Conventional	1,507	1,303	191
	FHA	471	388	12
	VA	239	317	4
	FSA/RHS	163	3	0
Loans Originated				
	Conventional	1,050	604	88
	FHA	239	133	7
	VA	133	123	2
	FSA/RHS	81	1	0
Loans Approved but not accepted				
	Conventional	29	55	18
	FHA	7	20	0
	VA	4	6	0
	FSA/RHS	1	0	0
Applications Denied				
	Conventional	84	303	72
	FHA	45	110	1
	VA	19	81	1
	FSA/RHS	18	0	0
Applications Withdrawn				
	Conventional	94	171	4
	FHA	37	60	0
	VA	19	50	0
	FSA/RHS	5	0	0
Files Closed for Incompleteness				
	Conventional	41	76	8
	FHA	5	17	2
	VA	2	29	1
	FSA/RHS	1	0	0

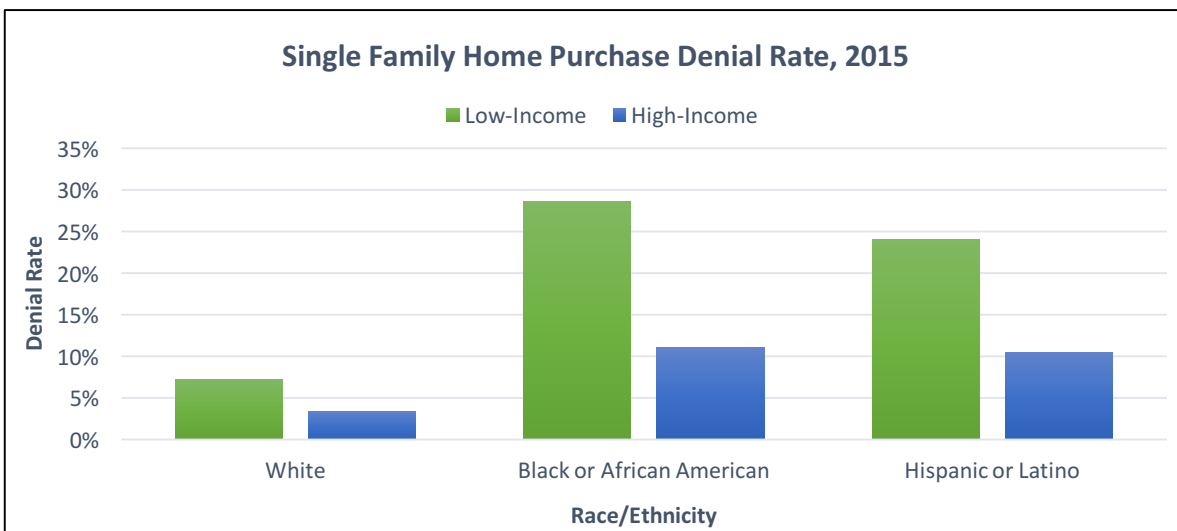
Of the home purchase loans for single-family homes that were originated in 2015, (1,500 loans originated) approximately 70 percent of these originations were provided by conventional lenders, higher than the national conventional home purchase share of 61 percent. The remaining 30 percent were provided by federally backed sources including the FHA, VA and FSA/RHS (Rural Housing Service). The FHA, VA, RHS lenders had application/approval ratios of 44 percent, 46 percent and 49 percent, respectively. Conventional lenders, by contrast, originated home purchase loans at a higher 58 percent of all applications.

A further examination of the 734 denials within Greenville during 2015 indicates that more than two-thirds were for applicants seeking to refinance existing mortgages for owner-occupied, primary residences. The number one reason for denial of refinance applications was credit history (31 percent of refinance denials), followed by lack of collateral (21 percent of refinance denials). Typically, homeowners seeking to refinance their existing home mortgage are able to use their home as collateral. When the denial reason given for a refinance is a lack of collateral, this would indicate the home is worth less than the existing mortgage and, therefore, refinancing is not an option – these homes are commonly referred to as “under-water” or the borrowers are “upside-down” in their mortgage.

The percentage of loan application denials for traditional home purchase loans for one-to-four family housing in Greenville varies by race/ethnic groups. It should be noted that the majority of conventional home purchase applicants in 2015 were non-Hispanic whites (more than 70 percent), followed by black applicants at nearly 23 percent. Hispanic (3 percent) and Asian (2 percent) applicants were represented by much smaller sample sizes, and are excluded from much of the following analysis due to insufficient data. In 2015, whites were least likely to be denied for conventional single-family home purchases, being denied at a rate of under 5 percent. Hispanics and Asians were denied at similar rates of 10 and 11 percent respectively, while black applicants faced the highest home purchase denial rate at 12 percent.

Additionally, a closer look at home purchase denial rates by race/ethnicity and income group within Greenville, shown below, demonstrates that high income blacks and Hispanics (having greater than 120 of Area Median Income) were more likely to be denied for a single-family home purchase, at 11 percent, than low income whites (having less than 80 percent of Area Media Income), at 7 percent. Further, low income blacks were the group with the highest home purchase denial rate at 29 percent, more than triple the rate of low income

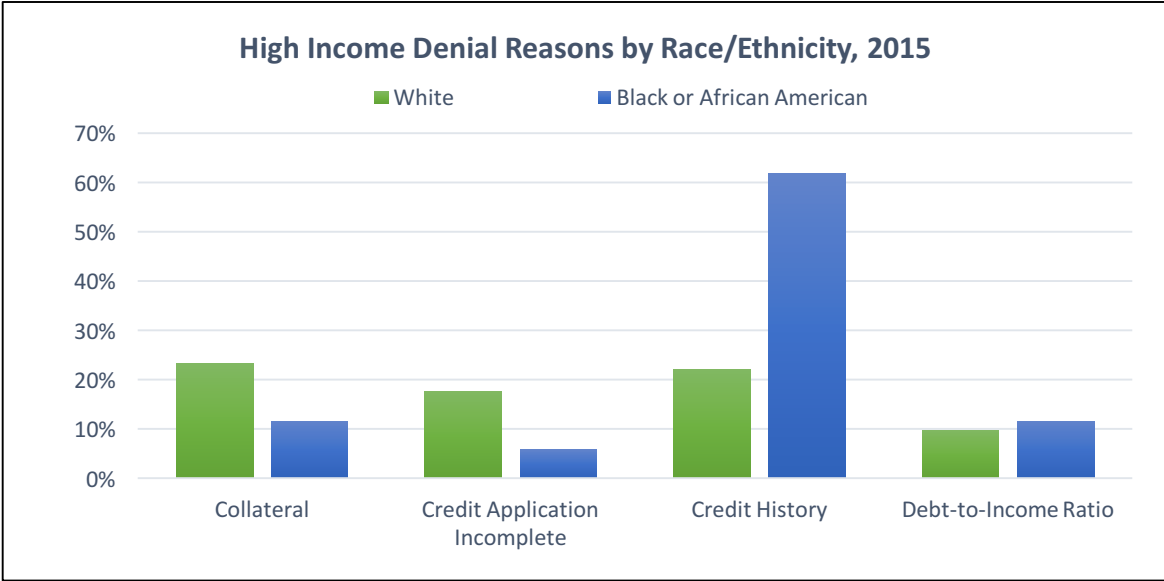
whites. High income blacks experienced a denial rate similar to high income Hispanics at approximately 11 percent, while high income whites were denied at a rate of 3 percent, the lowest of all groups examined. White applicants demonstrated the lowest disparity in denial rates between low- and high-income applicants, at 4 percent. The gap between low- and high-income Hispanics was approximately 14 percent while black applicants showed the greatest disparity in denial rates between low- and high-income applicants at 18 percent.



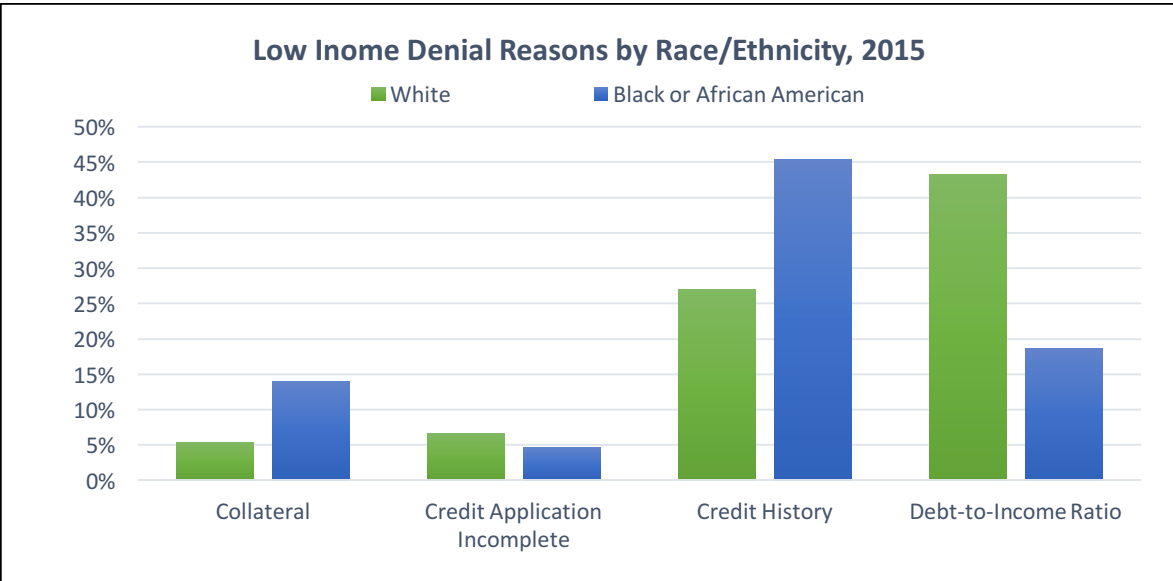
Application Denial Reasons by Income Group

The below charts compare denial reasons among black and white applicants in Greenville for 2015 by income group. Hispanic and Asian applicants are excluded due to small sample sizes.

As of 2015, the leading denial reason for high income black applicants by a significant margin was credit history, representing more than 60 percent of all denials. By contrast, denial reasons for high income white applicants were more evenly distributed, with lack of collateral as the most common denial reason at 23 percent, followed closely by credit history at 22 percent. High income whites were twice as likely to be denied for lack of collateral relative to high income blacks and three times as likely to be denied for incomplete credit applications.



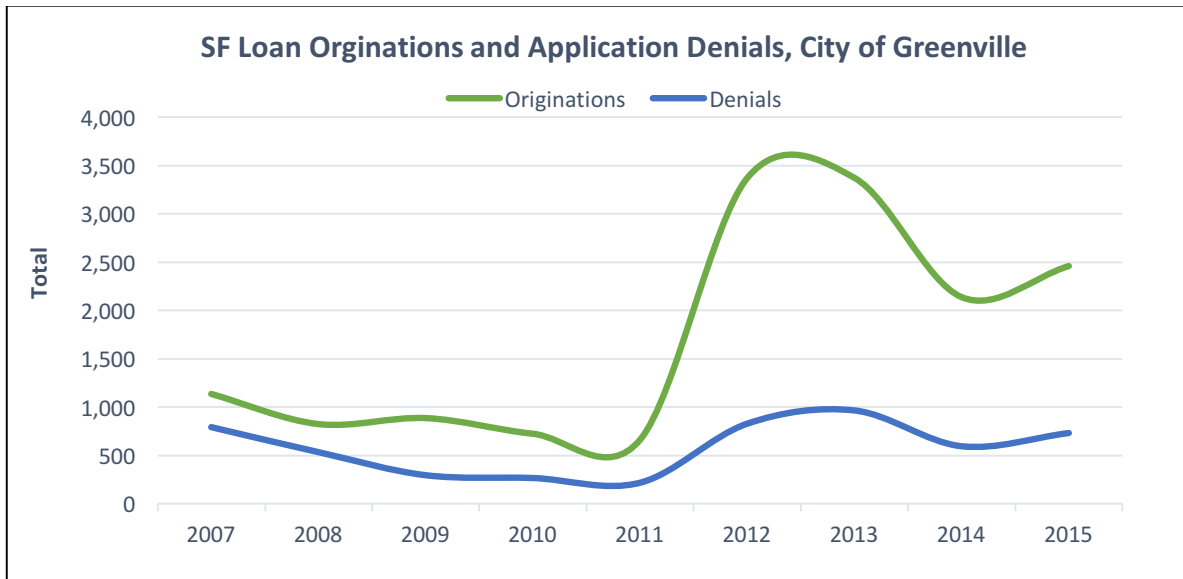
For low income denials, lack of collateral and incomplete credit applications represented relatively small shares in 2015, with the mild exception of the 14 percent of low income black applicants that were denied for lack of collateral. Both low income black applicants and low income white applicants were denied for debt-to-income ratio at a higher rate than their high income counterparts, and in the case of low income whites, the rate was more than quadruple. Similar to high income black applicants, credit history was the primary denial reason for low income black applicants.



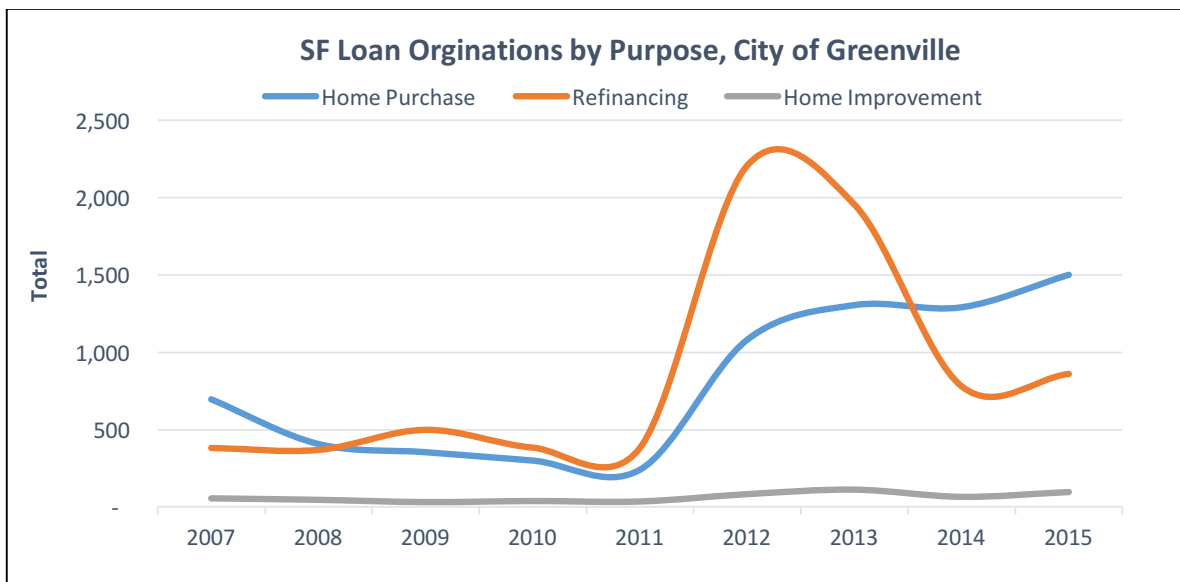
Greenville's Single-family Lending Market, 2007-2015

The following section will examine HMDA data over the time period 2007-2015, for the city of Greenville.

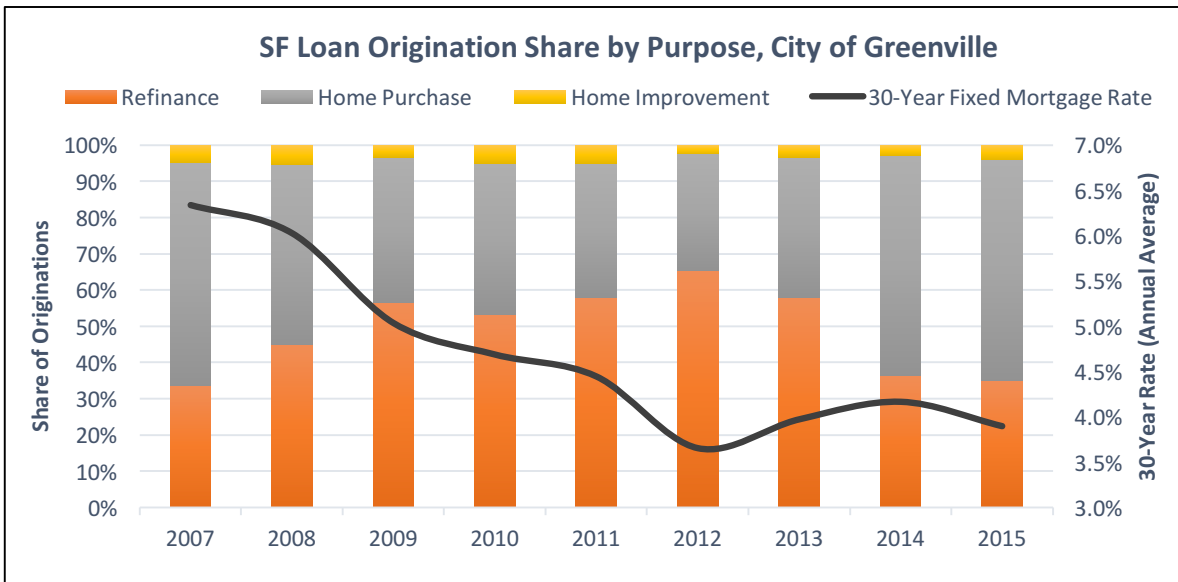
Highlighted below, the number of single-family loan originations in Greenville followed a dynamic trajectory between 2007 and 2015. At the onset of the housing crisis, originations declined between 2007 and 2008, followed by a slight increase between 2008 and 2009, in contrast to many other locations. Subsequently, originations trended downward between 2009 and 2011, falling to the lowest level of all years examined. Between 2011 and 2012, however, the total number of originations in Greenville more than quintupled, increasing by more than 2,700 and reaching nearly triple the 2007 total. Loan originations then fell by more than a third between 2013 and 2014, though grew by more than 15 percent between 2014 and 2015, and remain more than double the level prior to the housing crisis. In contrast to originations, the number of application denials within Greenville demonstrated less extreme changes between 2007 and 2015, falling every year between 2007 and 2011, increasing between 2011 and 2013 and fluctuating between 2013 and 2015. As of the most recent data year, denials are 8 percent below the level experienced in 2007. Relatedly, the share of denials as a percent of total originations and total denials has declined markedly since the housing bust, from more than 40 percent to approximately 23 percent.



Shown below, much of the year-to-year fluctuations in total originations that occurred between 2007 and 2015 were the result of refinancing originations. Though home purchases represented the top loan purpose by total originations prior to the housing bust in 2008, refinancing became the leading loan purpose between 2009 and 2013, and by significant margins in 2012 and 2013. Since 2014, home purchases have been the top loan purpose in Greenville, comprising more than 60 percent of the city’s total as of the most recent data year. The year-over-year growth of 16 percent between 2014 and 2015 reflects growing housing demand within the city.



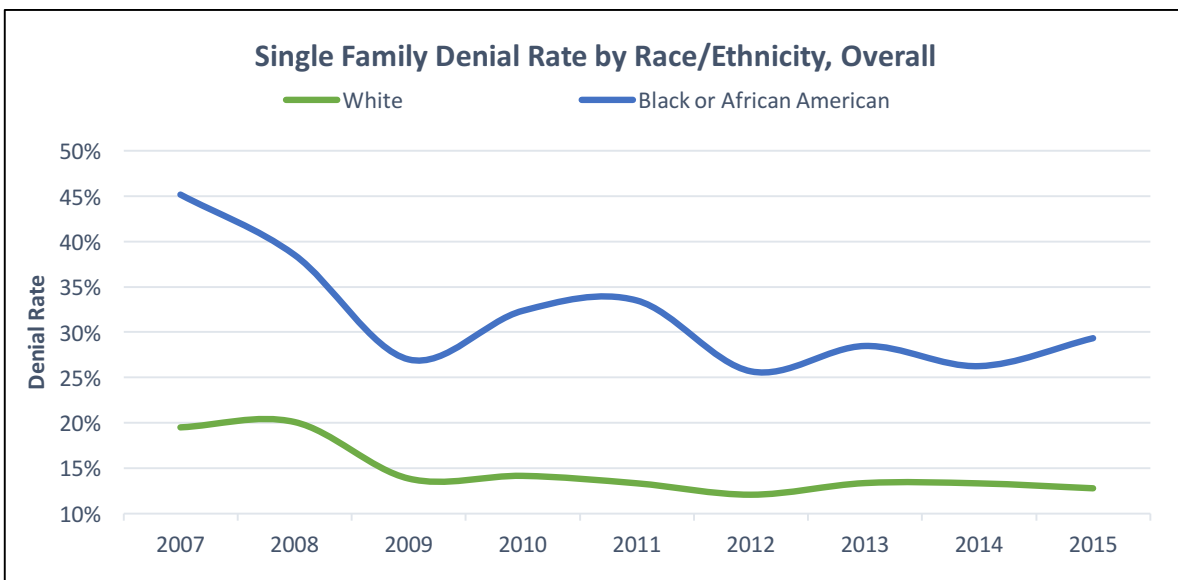
The level of refinance originations appears to move generally with the 30-year fixed rate mortgage average, shown below. In 2012, for example, when the average 30-year fixed rate mortgage was at its lowest level of all the years examined, refinance originations in Greenville surged in absolute numbers, reaching the highest share of all years examined. The decrease in the annual average of the 30-year fixed mortgage rate between 2014 and 2015 is consistent with Greenville’s 10 percent growth in the number of refinance loans over the same time period.



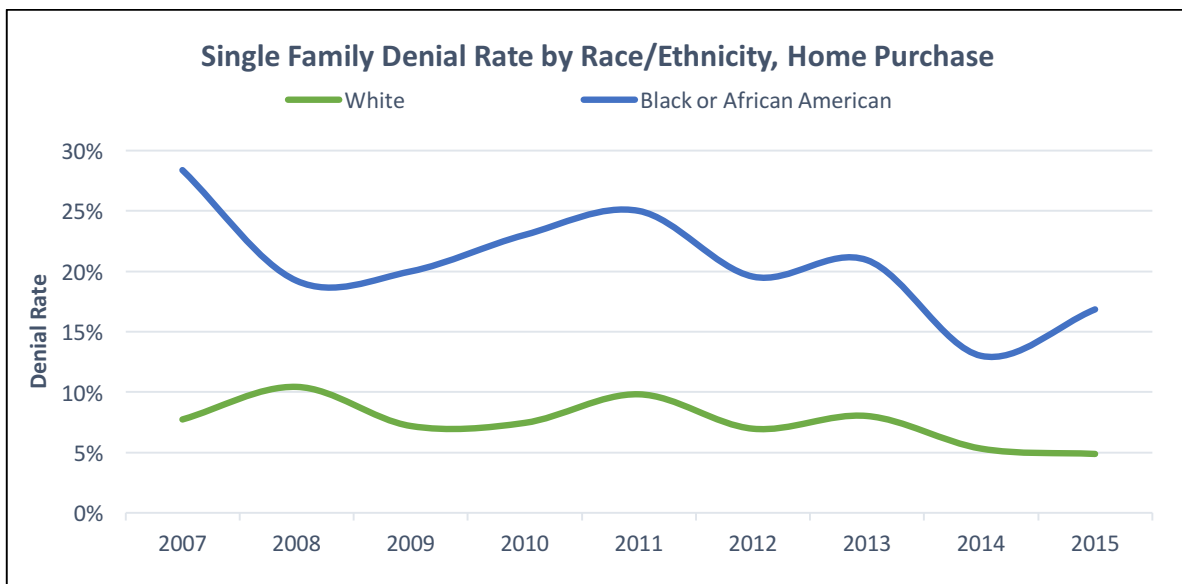
Source: HMDA, Federal Reserve Bank of St. Louis

Income, Race, and Single-family Loan Denials in Greenville

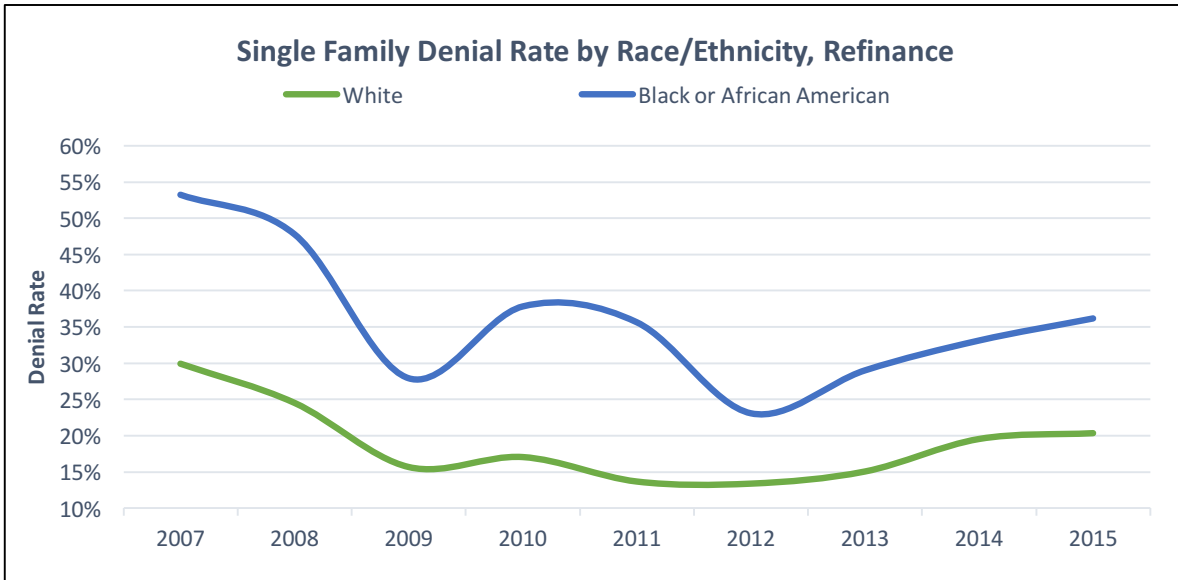
Denial rates for single-family loans in Greenville over time vary by race and ethnicity. The charts below show that between 2007 and 2015, white applicants were less likely to be denied relative to black applicants for all years examined. Though the denial rate for black applicants has fallen significantly from the rates prior to the housing bust, the overall disparity between black and white applicants has remained roughly the same, with black applicants approximately 2.3 times more likely to be denied than white applicants.



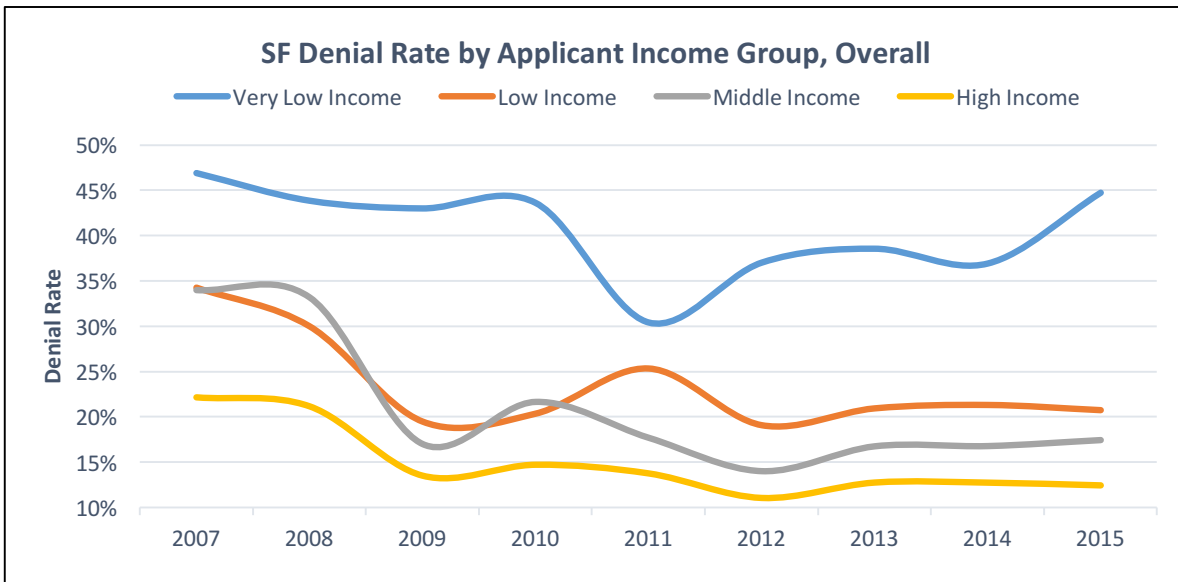
Home purchase applications exhibit lower denial rates for both black and white applicants relative to overall denial rates. The gap between black and white denial rates, however, is greatest for home purchases, with black applicants more than 3.4 times as likely to be denied for a home purchase relative to white applicants in 2015. Similar to overall denial rates, whites are the least likely of the two groups to be denied for every year examined. Additionally, black applicants saw a relatively sharp increase in the home purchase denial rate between 2014 and 2015, while the white denial rate declined slightly.



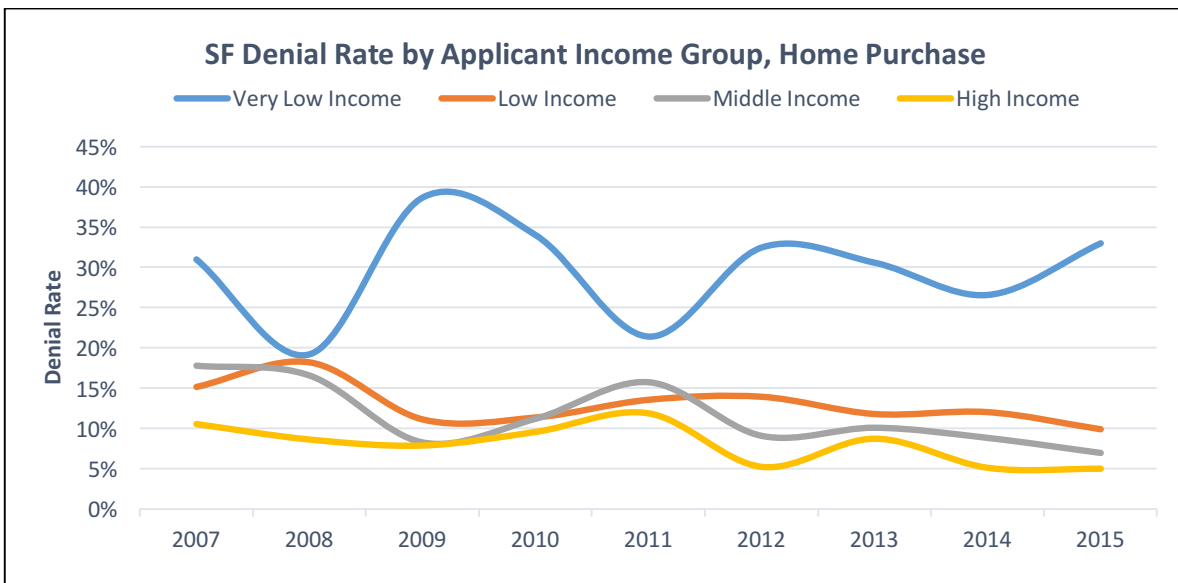
Consistent with the overall denial rate as well as the denial rate for home purchases, whites were the group with the lowest denial rate for a refinance application in all study years. For both black and white refinance applicants, denial rates have been increasing each year since 2012.



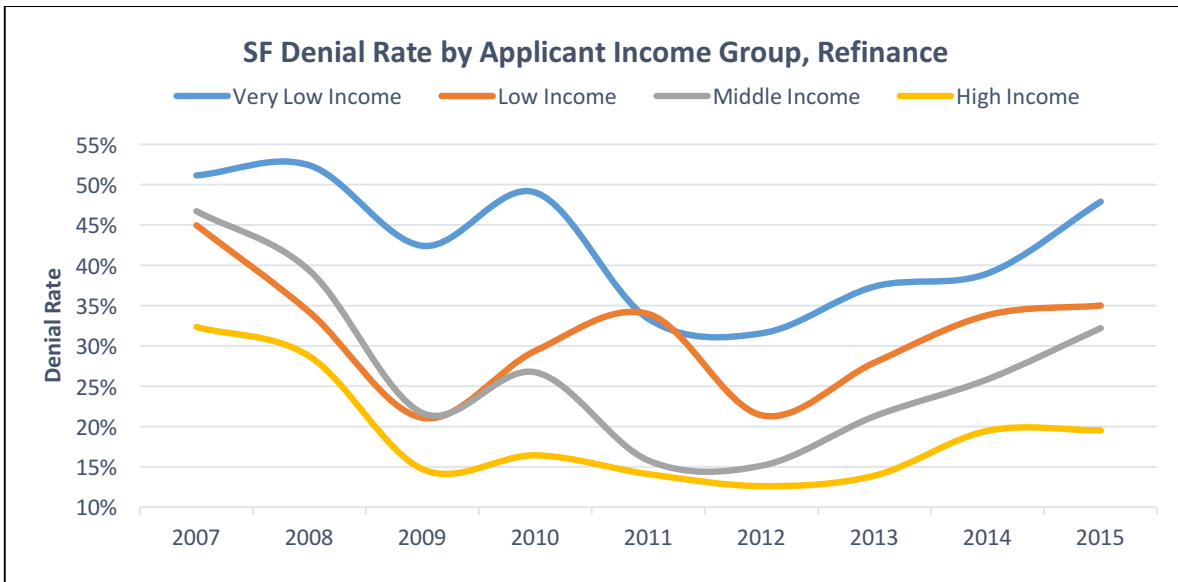
A view of single-family denial rates by applicant income group within Greenville, highlighted below, shows the expected outcome of higher income groups generally experiencing lower denial rates than lower income groups. Very low income applicants (50 percent of less of Area Median Income), however, have remained well above other income groups during the years examined, with increasing divergence since 2011. High Income (greater than 120 percent of Area Median Income) applicants consistently demonstrated the lowest overall denial rate. Since 2011, middle income (80 to 120 percent of Area Median Income) applicants have experienced the second lowest rate of denial, with low income (between 50 percent and 80 percent of Area Median Income) applicants consistently above the other two. The single-family denial rate for all income groups declined between 2007 and 2015, though it has risen significantly for very low income applicants since 2011.



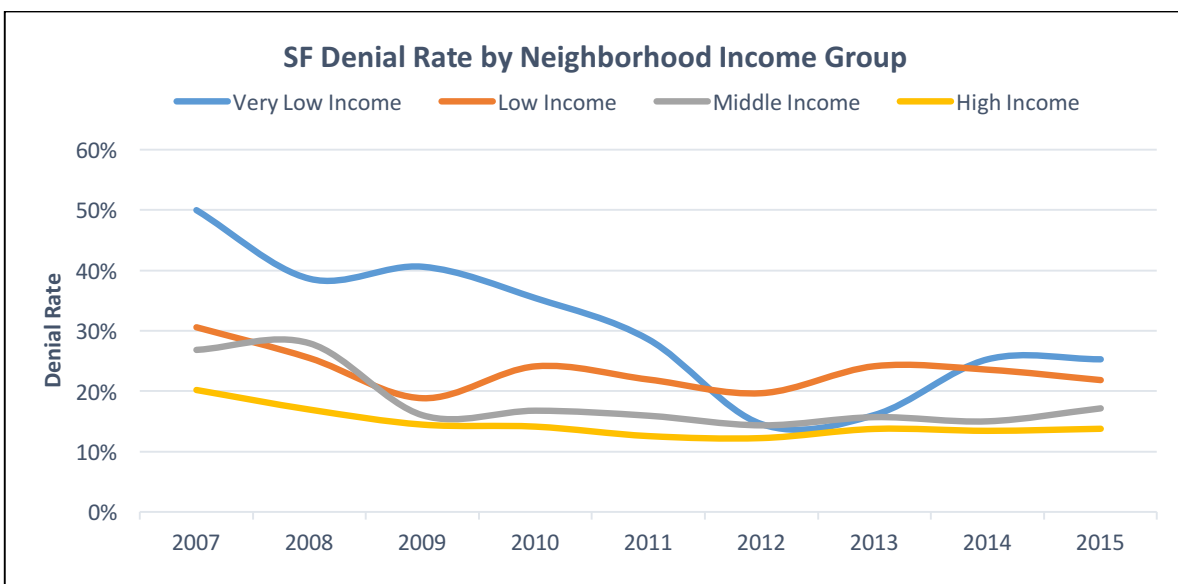
Similar to overall denial rates by income group, home purchase applications were denied at higher rates for very low income applicants between 2007 and 2015 while low, middle and high income applicants have remained closer to each other since 2009. In 2014 and 2015, home purchase denial rates for high income and middle income applicants were under 10 percent.



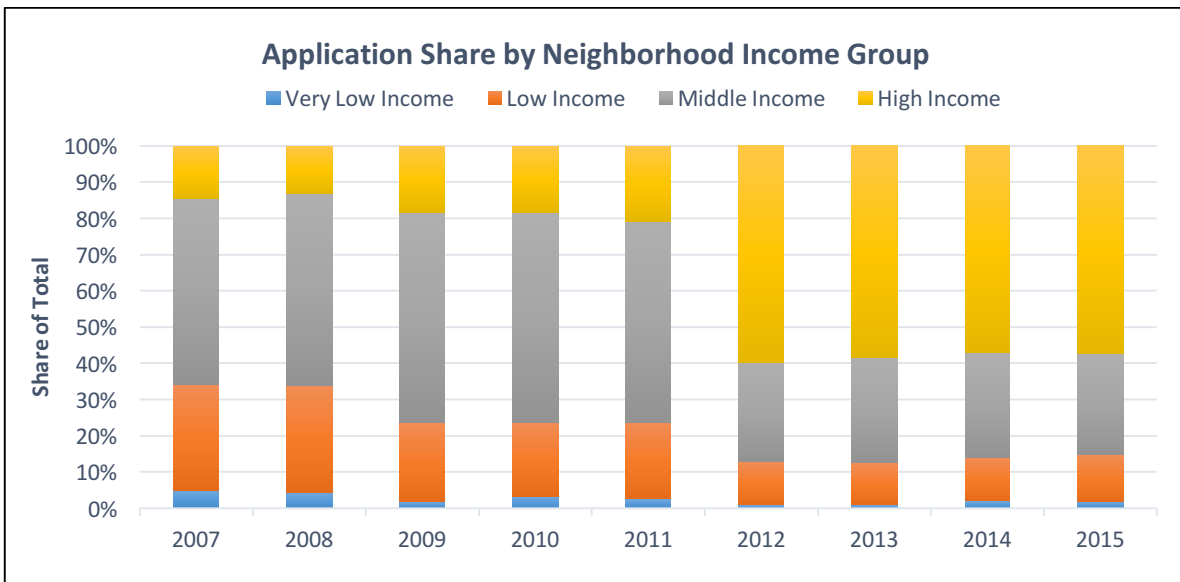
For all income groups, denial rates for refinance applications were higher than overall denial rates as well as those for home purchases as of 2015.



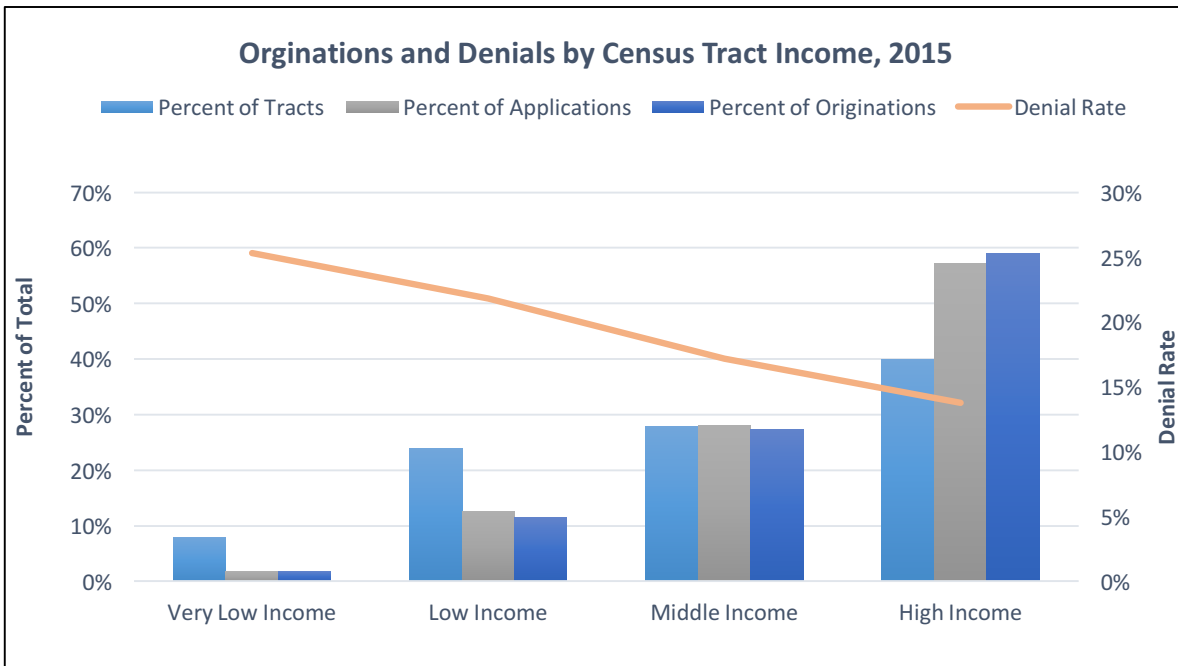
In addition to the income of the applicant, the median income of the property’s neighborhood (defined as Census Tract) also reveals the high income group outperforming other groups with regard to the denial rate. Though the sample size for very low income neighborhoods is much lower than other groups (discussed further below), years 2012 and 2013 show very low income neighborhoods experiencing lower denial rates than low income neighborhoods. In 2014 and 2015, however, the ranking of denial rates by neighborhood income groups was ordered by level of income. All neighborhood income groups have seen reductions in the single-family denial rate since 2007 as of 2015.



As a percentage of total applications within Greenville, middle income neighborhoods represented the largest share and majority every year between 2007 and 2011, though high income neighborhoods became the dominant group from 2012 onward. This is consistent with the observation that many neighborhoods within Greenville transitioned from middle income to high income classification between 2011 and 2012. In recent years, the distribution of applications by neighborhood income level has remained mostly unchanged.

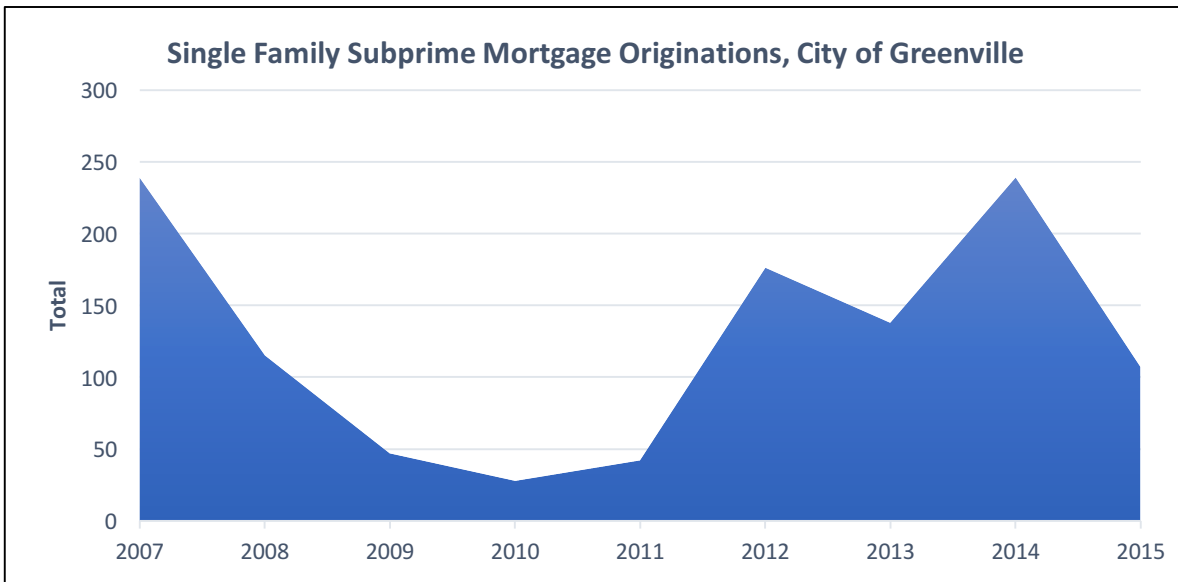


Within Greenville, very low income and low income neighborhoods represent 32 percent of the city's total neighborhoods, although they are represented by approximately 14 percent of total originations and 15 percent of total applications as of 2015, shown below. This suggests that low and very low Income neighborhoods within Greenville are less likely to participate in the single-family lending market. By contrast, loan applications and originations within Greenville are disproportionately likely to occur for properties in high income neighborhoods. For example, high income neighborhoods represent 40 percent of the city total, though they account for 57 percent of applications and 59 percent of all single-family loans originations throughout the city in 2015.



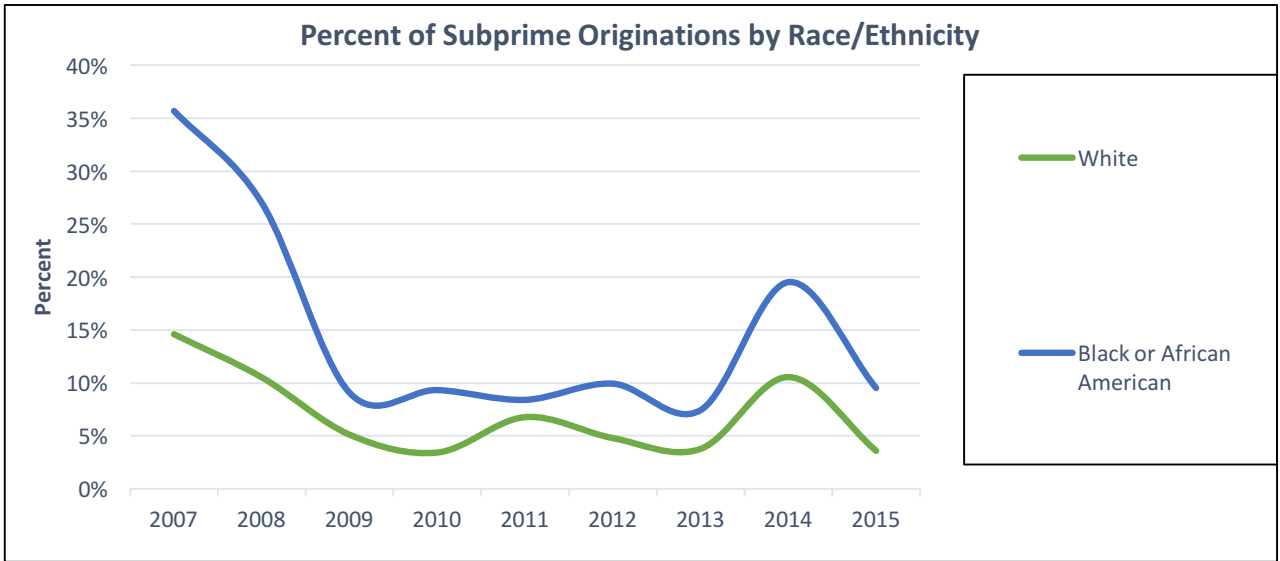
The Subprime Market

Illustrated below, the subprime mortgage market in Greenville declined significantly between 2007 and 2010, though on net increased sharply between 2011 and 2014, followed by a mild decline as of 2015. Subprime loans are defined as those with an annual percentage rate that exceeds the average prime offer rate by at least 1.5 percent. The total number of subprime loan originations fell by over 55 percent between 2007 and 2015, while prime originations increased by 160 percent during the same time period. Since 2010, however, the number of subprime loan originations has grown by more than 280 percent, though still remains less than 45 percent of the city’s 2007 levels. Relatedly, subprime originations as a percent of Greenville’s total has declined from 21 percent to 4 percent between 2007 and 2015.

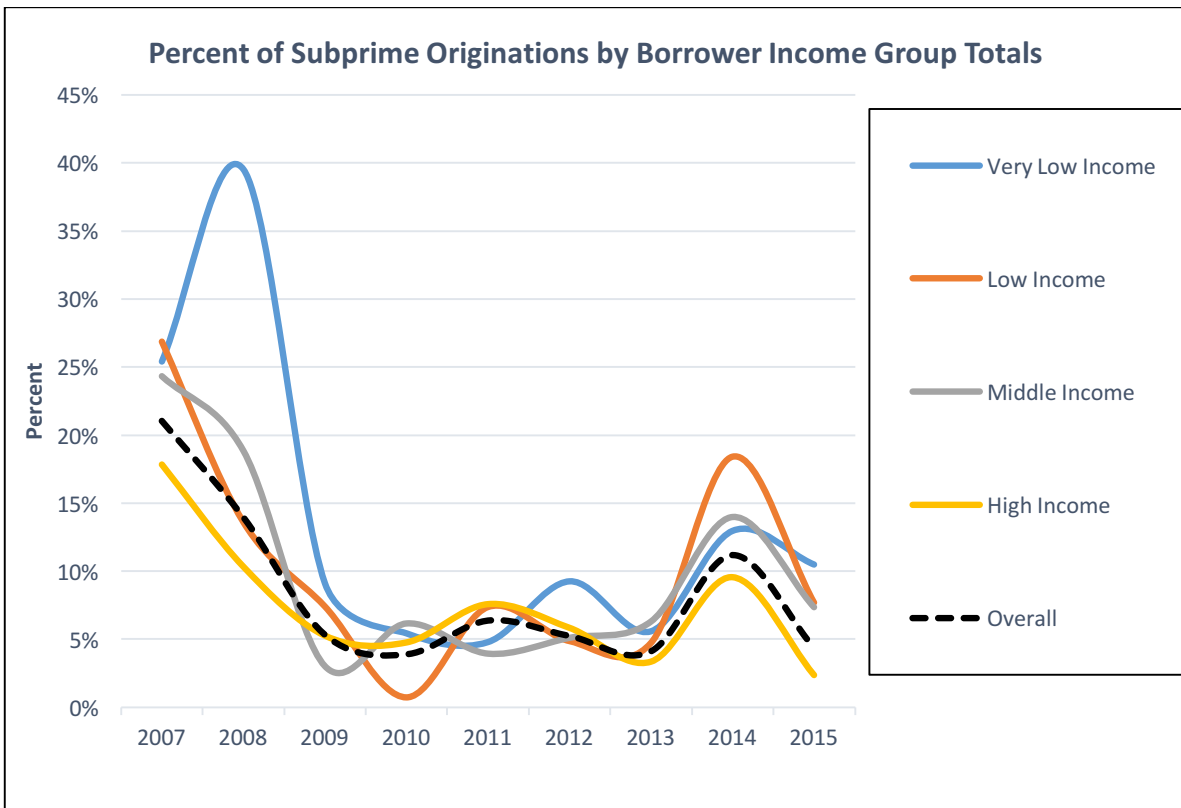


Looking at the share of subprime loans as a percentage of total originations by race reveals that black loan recipients were nearly two and a half times as likely to be subprime relative to white loan recipients in 2007. This trend is consistent with the broader national pattern of minorities being disproportionately subjected to predatory subprime lending leading up to the housing crash, as outlined in a post-crisis report by the U.S. Department of Housing and Urban Development.² The period between 2007 and 2009 saw the subprime share for black borrowers decline substantially, falling from 36 percent to 9 percent. Though the subprime share for both black and white borrowers remained below 10 percent between 2009 and 2013, the subprime share for both groups increased between 2014 and 2015 to 20 and 11 percent respectively. As of 2015, however, both groups had a subprime share under 10 percent, though black borrowers are more than 2.6 times as likely to be subprime relative to white borrowers. Relative to the pre-crisis share of subprime originations, black and white originations are under 30 percent of the 2007 share, at 27 and 25 percent, respectively.

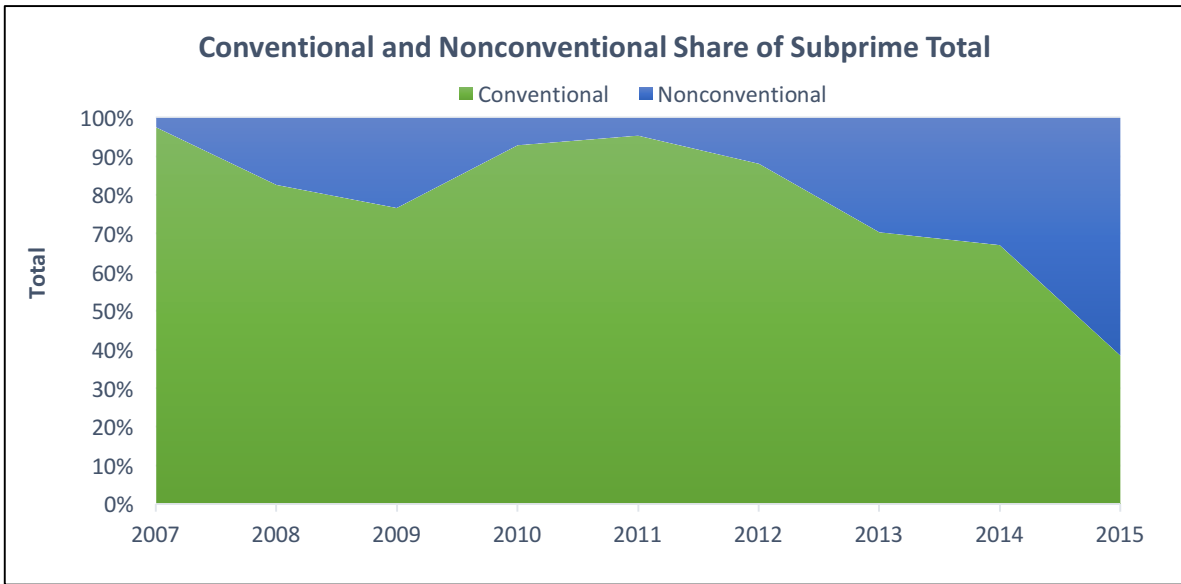
² https://www.huduser.gov/portal/publications/foreclosure_09.pdf



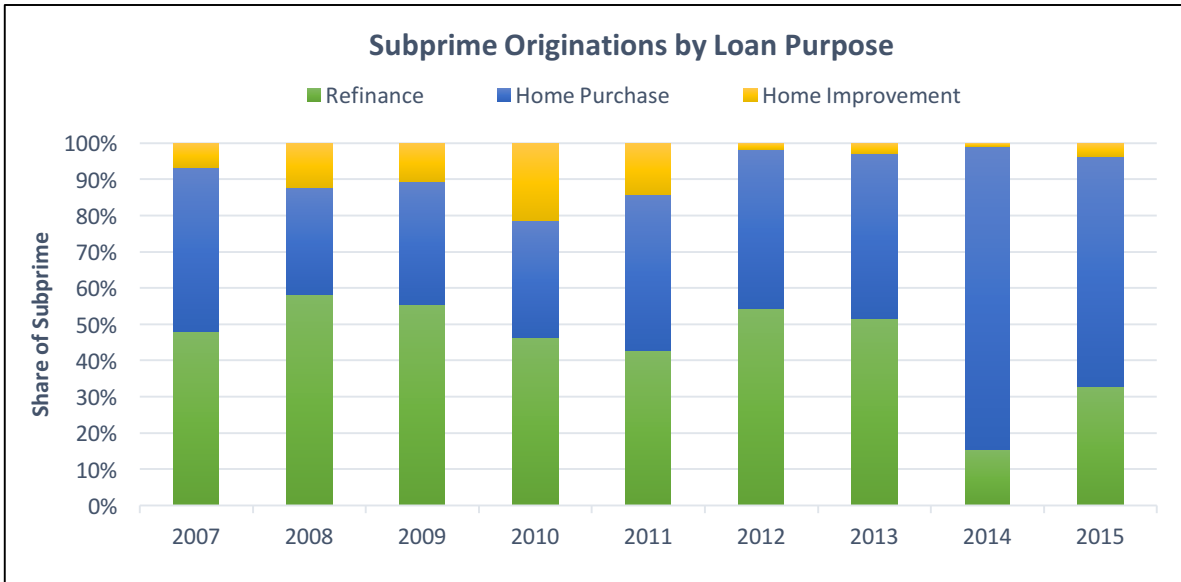
A view of subprime originations by income group totals shows a sharp decline between 2007 and 2010 among all groups, with broad increases from 2013 to 2014. Between 2014 and 2015, however, subprime shares for all income groups decreased, with changes most pronounced in the low- and middle-income borrower groups.



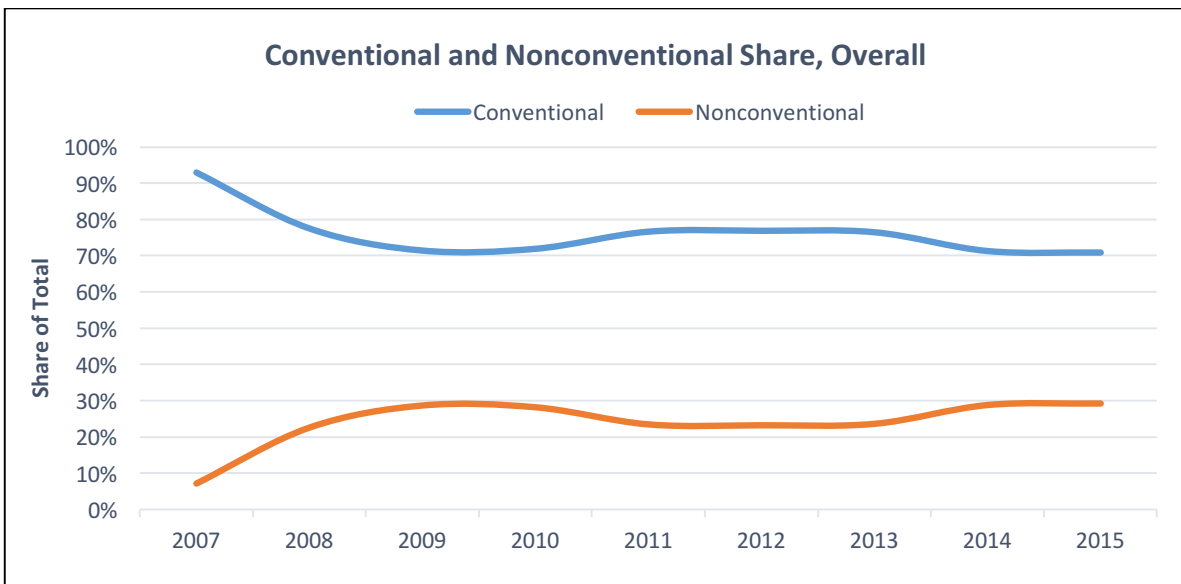
Consistent with broader national trends, the composition of subprime loans within Greenville has shifted from conventional loans to government-insured nonconventional loans in recent years. In 2007, approximately 98 percent of subprime loans within the city were originated by conventional lenders. As of 2015, that percentage has dropped to 38 percent, decreasing every year from 2011 onward. Of the nonconventional subprime loans originated in Greenville, the overwhelming majority are insured by the Federal Housing Administration (more than 98 percent in 2015).

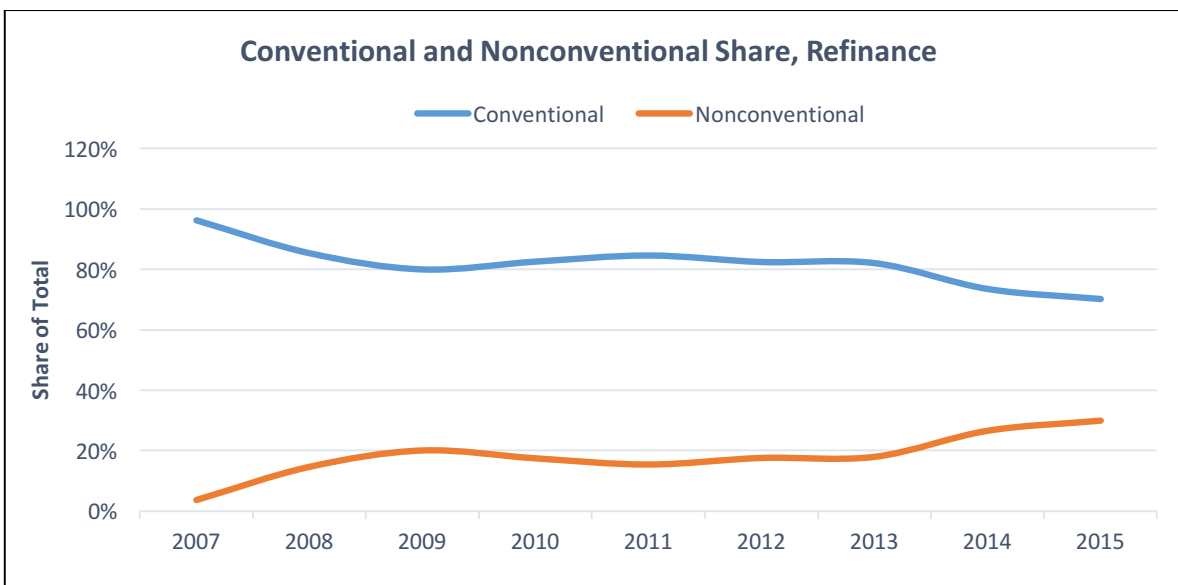
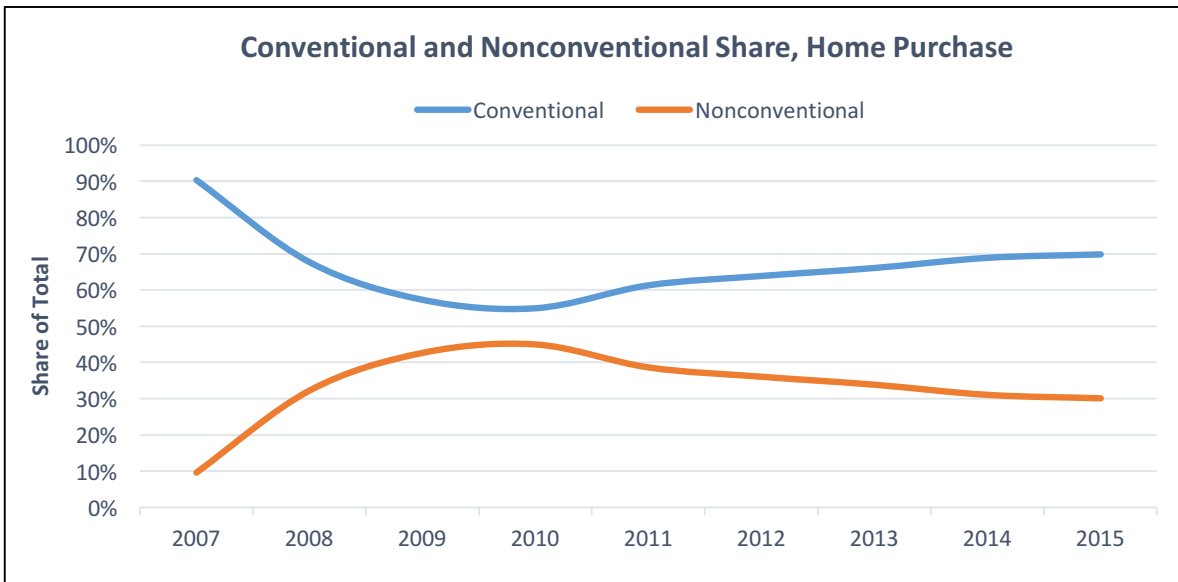


As a percentage of all subprime loan originations within Greenville, home purchases represented nearly two-thirds in 2015, up from 45 percent in 2007 and a low of 32 percent in 2010, though down from a peak of approximately 84 percent in 2014.



Though subprime loans within Greenville are mostly nonconventional, more than 70 percent of all single-family originations in 2015 were from conventional lenders, higher than the national average of 61 percent. For home purchase and refinance originations in Greenville, the majority were conventional in every year between 2007 and 2015. The relatively high share of conventional lending in Greenville is consistent with its prevalence of high income borrowers and neighborhoods.





Mortgage lending activity in Greenville is consistent with many of the broader trends that have occurred in the wake of the housing bust, recession and subsequent recovery.

Further, Greenville exhibits relatively strong mortgage market fundamentals, despite an overall year-over-year origination growth rate that is lower than the United States as a whole. Home purchase originations have remained relatively high and steady since 2012, suggesting signs of strong housing demand and a housing market recovery. Greenville is also characterized by an above average share of conventional borrowers, consistent with the city's high share of higher income neighborhoods.

The city has also been subject to cyclical trends that reflect broader economic conditions in recent years, including changes in mortgage rates that influence the prevalence of refinance originations. The subprime market remains well below its peak prior to the housing bust, despite a close return in 2014, and government-insured mortgages have increased, consistent with tighter credit conditions and a more active regulatory environment in the wake of the housing crash.

Some trends, however, have continued despite business cycle fluctuations, such as higher denial rates for black applicants relative to white applicants, in addition to higher denial rates for lower income applicants and neighborhoods.

b. The program participant may also describe other information relevant to its assessment of disproportionate housing needs. For PHAs, such information may include a PHA's overriding housing needs analysis.

The Housing Authority of the City of Greenville “promotes the development of professional management of a variety of affordable housing opportunities, facilities and supportive services to nurture neighborhoods, provide economic development and self-sufficiency activities for residents while also assuring equal access to safe, quality housing for low- and moderate-income families throughout the community.”

To accomplish this goal, the Housing Authority of the City of Greenville runs the following programs:

- Family Self Sufficiency – this voluntary program assists families receiving HUD Housing Choice Voucher or living in public housing to improve their economic situation
- HCV Homeownership – The HCV Homeownership Program provides low-income, disabled and elderly families who are eligible to expand their housing opportunities
- Housing Choice Voucher Program – This program offers expanded opportunities for rental assistance for very low-income families in privately owned housing units.

Additionally, the Housing Authority of the City of Greenville runs several programs that are designed to improve the community including Partnership for Progress, Community Police Officers, Neighborhood Network, and Shelter Plus Program.

3. Contributing Factors of Disproportionate Housing Needs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disproportionate housing needs.

- Availability of affordable units in a range of sizes
- Displacement of residents due to economic pressures
- Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking
- Lack of access to opportunity due to high housing costs
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Land use and zoning laws
- Lending discrimination
- Loss of Affordable Housing
- Source of income discrimination
- Other

In order for a community to see economic growth and development, it is necessary to have diverse housing options. *The availability of affordable units in a range of sizes* is a factor that can create, contribute to, perpetuate or increase the severity of disproportionate housing needs in Greenville. The following table shows the availability of housing types within Greenville, Pitt County and North Carolina, as a whole. In particular, housing in the “missing middle” is particularly important in providing affordable housing options for residents. The missing middle refers to housing units that are neither large multi-family complexes nor one-unit detached dwellings. Many communities are missing this middle form of housing that many families desire. Within Greenville, the percentage of housing that falls in the missing middle is 39.2 percent, which is significantly higher than the county or state.

	1-unit, detached	1-unit, attached	2 units	3 or 4 units	5 to 9 units	10 to 19 units	20 or more units	% “Missing Middle” Housing
Greenville	34.0%	10.2%	7.2%	3.6%	18.2%	15.7%	9.3%	39.2%
Pitt County	48.7%	6.1%	5.2%	2.7%	10.4%	8.6%	5.2%	24.4%
North Carolina	65.2%	3.9%	2.1%	2.8%	4.4%	4.2%	4.0%	13.2%

Source: American Community Survey 5-Year Estimates 2011-2015, DP04
 Note: Total housing for each location does not equal 100 percent because two categories (mobile home and boat, RV, van) have been removed from the table.

Rising housing costs can lead to ***displacement of residents due to economic pressures***, which adds to disproportionate housing needs. As the cost of housing rises, it can push out low-income residents, particularly renters who do not see rising housing costs as an increase in the value of their investment.

C. Publicly Supported Housing Analysis

1. Analysis

a. Publicly Supported Housing Demographics

- i. Are certain racial/ethnic groups more likely to be residing in one program category of publicly supported housing than other program categories (public housing, project-based Section 8, Other Multifamily Assisted developments, and Housing Choice Voucher (HCV)) in the jurisdiction?**

Black households are more likely to reside in all publicly supported housing in the city, especially in public housing developments and in the HCV Program.

Blacks make up 34.6 percent of households in the city of Greenville, however, approximately 41.7 percent of households in the city that have extremely low incomes (0-30 percent AMI) are black. Additionally, 43.5 percent of households that are very low income (0-50 percent AMI) are black. This means black households in the city are more likely to have low incomes as compared to other race groups, which partly explains why a majority of households residing in publicly supported housing are black.

While the majority of residents in publicly supported housing are black, the race group is over represented in all public housing categories as compared to the percentage of black households in the city. Black households are more concentrated in public housing (98.2 percent), Project Based Section 8 (74.3 percent), other multifamily (60.5 percent) and almost all HCV Program (96.5 percent) participants than the percentage of black households the general population (34.6 percent). On the other hand, Hispanics accounted for 3 percent of households and Asians for 2.4 percent in the city, yet they had little or no representation in public housing programs.

Data note: The percentage of black persons in the total population in Greenville is 35.7 percent, while the percentage of black households among all households in the city is 34.6 percent. The percent of persons who identify as Hispanic in the city was 4 percent, while the percent of Hispanic households was 3 percent. The percent of Asians in the city was 2.3 percent, while the percent of Asian households was 2.4 percent. (Source: HUD Table 1, Demographics & HUD Table 6, Publicly Supported Households by Race/Ethnicity)

HUD Table 6 - Publicly Supported Housing Residents by Race/Ethnicity								
(Greenville, NC CDBG, HOME) Jurisdiction	Race/Ethnicity							
	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	6	0.88%	667	98.23%	4	0.59%	0	0.00%
Project-Based Section 8	103	23.20%	330	74.32%	3	0.68%	5	1.13%
Other Multifamily	14	36.84%	23	60.53%	0	0.00%	0	0.00%
HCV Program	21	2.95%	687	96.49%	3	0.42%	1	0.14%
Total Households	20,083	58.26%	11,941	34.64%	1,035	3.00%	839	2.43%
0-30% of AMI	3,170	53.64%	2,463	41.68%	135	2.28%	45	0.76%
0-50% of AMI	4,565	47.11%	4,212	43.47%	220	2.27%	170	1.75%
0-80% of AMI	7,219	45.71%	7,111	45.02%	595	3.77%	300	1.90%

Note 1: Data Sources: Decennial Census; APSH; CHAS
Note 2: #s presented are numbers of households not individuals.
Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

ii. Compare the racial/ethnic demographics of each program category of publicly supported housing for the jurisdiction to the demographics of the same program category in the region.

In comparing protected groups (elderly, disabled, race and familial status) to the general population in Greenville with regards to the population in publicly supported housing, persons who are elderly, disabled, black and families with children have a higher proportion of those in public housing programs than the general public in many categories. The figures from HUD provided AFH tables provide data for public housing households in racially/ethnically-concentrated areas of poverty (R/ECAP) tracts and non-R/ECAP tracts, and both are compared against the general population estimates.

Elderly

According to the HUD-provided AFH Table 1, elderly persons 65 and older made up approximately 8.8 percent of the population in Greenville. While elderly made up 8.8 percent of the population in the city, this group accounted for a larger percentage of the residents in most publicly supported housing categories.

The HUD AFH Data Table 7, in R/ECAP tracts, shows data for three publicly supported housing categories: public housing, Project-based Section 8 and the Housing Choice Voucher Program (HCV). Elderly made up 23.3 percent of the residents in public housing developments and 17.7 percent of participants in the HCV Program. There were fewer elderly represented in Project-based Section 8 with only 5.6 percent.

In non-R/ECAP tracts, publicly supported housing was available in three categories: Project-

based Section 8, other HUD multifamily units and the HCV Program. The elderly population was overrepresented in all three programs: 86.3 percent of Project-based Section 8 residents, 86.4 percent of Other HUD Multifamily units and 18.1 percent of HVC Program residents were elderly. (Data Source: HUD AFH Table 7)

Persons with a Disability

According to the HUD-provided AFH Table 14, persons with a disability made up approximately 10.6 percent of the population in Greenville ages 5 and up. Persons with a disability made up a larger percentage of the public housing population in three of the four housing categories.

HUD AFH Data Table 7, in R/ECAP tracts, data shows data for three publicly supported housing categories: public housing, Project-based Section 8 and the Housing Choice Voucher Program (HCV). Persons with a disability made up 16.9 percent of the residents in public housing developments, 14.7 percent of participants in the HCV Program, and 11.1 percent in Project-based Section 8. All were higher than the disability rate in the city.

In non-R/ECAP tracts, publicly supported housing was available in three categories: Project-based Section 8, other HUD multifamily units and the HCV Program. The disabled population was overrepresented two of the three programs: 24.1 percent of Project-based Section 8 residents and 21.6 percent of HVC Program residents were persons with a disability. Other HUD multifamily housing had less than the citywide percentage of persons with a disability with 2.3 percent. (Data Source: HUD AFH Table 7)

Blacks

According to the HUD-provided AFH Table 1, blacks made up approximately 35.7 percent of the population in Greenville. While a minority population, blacks are overrepresented in all publicly supported housing categories.

HUD AFH Data Table 7, in R/ECAP tracts, shows data available for three publicly supported housing categories: Public Housing, Project-based Section 8 and the Housing Choice Voucher Program (HCV). Almost all the residents were black with 98.2 percent in public housing developments, 97 percent of participants in the HCV Program, and 100 percent in Project-based Section 8. All were much higher than the average percentage of blacks in the city.

In non-R/ECAP tracts, publicly supported housing was available in three categories: Project-based Section 8, other HUD multifamily units and the HCV Program. The black population

was also overrepresented in the three programs in these tracts with 66.7 percent of the residents in Project-based Section 8 units, 60.5 percent in other HUD multifamily units, and 96 percent of participants in the HCV Program. All were also much higher than the average percentage of blacks in the city. (Data Source: HUD AFH Table 7)

Families with Children

Families with children made up approximately 47.9 percent of family types in Greenville. This family type was more prevalent in R/ECAP tracts.

According to HUD AFH Data Table 7, in R/ECAP tracts, data was available for three publicly supported housing categories: public housing, Project-based Section 8 and the Housing Choice Voucher Program (HCV). Publicly supported housing in R/ECAP tracts had a higher percentage of families with children residing in them than the percentage of the family type in the general population. More than half the residents were families with children with 57.4 percent of the residents in public housing developments, 58.8 percent of participants in the HCV Program and 55.6 percent in project-based Section 8. All were higher than the percentage of families with children in the city.

In non-R/ECAP tracts, publicly supported housing data was available in three categories: Project-based Section 8, other HUD multifamily units and the HCV Program. Families with children were 10.6 percent of the residents in Project-based Section 8 units and 49.5 percent of participants in the HCV Program. Data showed that there was none of this family type in other HUD multifamily units. (Data Source: HUD AFH Table 7)

R/ECAP and Non-R/ECAP tract comparison for Publicly Supported Housing

As R/ECAP tracts represent a much smaller geographic portion of the city as compared to non-R/ECAP tracts, is not surprising to see fewer units located in R/ECAP tracts when publicly supported housing is available in both tracts (by category). Public housing development units, however, can only be found in R/ECAP tracts in the city. Likewise, other HUD multifamily units can only be found in non-R/ECAP tracts. The only publicly supported housing categories that operate in both tracts in Greenville is Section 8 housing and the HCV Program. For Section 8 housing, there are 348 total occupied units in non-R/ECAP tracts while there are only 19 units in R/ECAP tracts. For the HCV Program, there are 573 total housing units in non-R/ECAP tracts while there are 99 units in R/ECAP tracts. As mentioned before, there is simply more non-R/ECAP tracts in the city than R/ECAP tracts, however, PHA's also encourage residents to find housing in areas where there is less poverty and a better chance at finding suitable living arrangements. Non-R/ECAP tracts provide families with these options. (Source: HUD Table 7 – R/ECAP and Non-R/ECAP

Demographics by Publicly Supported Housing Program Category)

HUD Table 7 - R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category								
(Greenville, NC CDBG, HOME) Jurisdiction	Total # units (occupied)	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with children	% Elderly	% with a disability
Public Housing								
R/ECAP tracts	684	0.88%	98.23%	0.59%	0.00%	57.35%	23.29%	16.89%
Non R/ECAP tracts	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Project-based Section 8								
R/ECAP tracts	19	0.00%	100.00%	0.00%	0.00%	55.56%	5.56%	11.11%
Non R/ECAP tracts	348	30.12%	66.67%	0.88%	1.46%	10.60%	86.25%	24.07%
Other HUD Multifamily								
R/ECAP tracts	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	36	36.84%	60.53%	0.00%	0.00%	0.00%	86.36%	2.27%
HCV Program								
R/ECAP tracts	99	0.99%	97.03%	0.99%	0.99%	58.82%	17.65%	14.71%
Non R/ECAP tracts	573	3.44%	96.04%	0.52%	0.00%	49.50%	18.06%	21.57%
<p>Note 1: Disability information is often reported for heads of household or spouse/co-head only. Here, the data reflect information on all members of the household.</p> <p>Note 2: Data Sources: APSH</p> <p>Note 3: Refer to the Data Documentation for details (www.hudexchange.info).</p>								

- iii. **Compare the demographics, in terms of protected class, of residents of each program category of publicly supported housing (public housing, project-based Section 8, Other Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant program category of publicly supported housing in the jurisdiction and region. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.**

Four race/ethnic groups were recorded in HUD AFH Data Table 6 – Publicly Supported Households by Race/Ethnicity. This table displays the percentage of residents from the race/ethnic groups that resided in publicly supported housing and their income level in the city by category (0-30 percent, 0-50 percent and 0-80 percent AMI). The groups recorded were white, black, Hispanic and Asian. In all housing program categories, black households represented a higher percentage of the residents in public housing as compared to the percent of the households in all low- and moderate-income categories. On the other hand, white households had fewer residents as compared to the percentage of white households in all low- and moderate-income categories. Hispanic households represented smaller shares of the residents in public housing program categories than the percentage of the race/ethnic group in all low- and moderate-income categories – meaning many Hispanic households were eligible for public housing, but did not utilize it. Representation in public housing categories for Asian households was varied, but generally, Asian households also did not utilize publicly supported housing.

Publicly Supported Housing and Income Eligibility: Black Households

Black households made up at least 60 percent or more of all publicly supported housing categories, and almost all of the residents in public housing developments (98.2 percent) and the HCV Program (96.5 percent). When accounting for all four public housing categories, black households make up 91 percent of all households using publicly supported housing in the city. This was higher than the percentage of the race group in each low- and moderate-income category (0-30 percent, 0-50 percent and 0-80 percent AMI) in the city. Black households made up 41.7 percent of all extremely low-income households, 43.5 percent of all low-income households, and 45 percent of all moderate-income households. These figures are all higher than the percentage of black households in the city (34.6 percent).

Publicly Supported Housing and Income Eligibility: Hispanic Households

Hispanic households made up fewer than 1 percent of all publicly supported housing categories. This was lower than the ethnic group in each low- and moderate-income category (0-30 percent, 0-50 percent and 0-80 percent AMI) in the city. Hispanic households made up 2.3 percent of all extremely low-income households, 2.3 percent of all low-income households and 3.8 percent of all moderate-income households. When accounting the raw number of households, there is a clear indication of how Hispanic households are not being served by public housing. For the ethnic group, there are a total of 135 very low-income households and 220 low income households in the city, however only 10 Hispanic households participated in publicly supported housing. Hispanic households are not utilizing publicly supported housing, even though many are eligible for these housing services.

Publicly Supported Housing and Income Eligibility: Asian Households

Asian households also generally made up 1 percent or lower of all publicly supported housing categories. With a few exceptions, this was also generally lower than the percentage of Asian households for each low- and moderate-income category (0-30 percent, 0-50 percent and 0-80 percent AMI) in the city. Asian households made up 0.8 percent of all extremely low-income households, 1.8 percent of all low-income households and 1.9 percent of all moderate-income households. Similar to Hispanic households, when accounting for raw household numbers, 45 Asian households were extremely low income and 170 were low income, however, only six households used publicly supported housing. This also points to Asian households not utilizing publicly supported housing even while there were households eligible for these housing services.

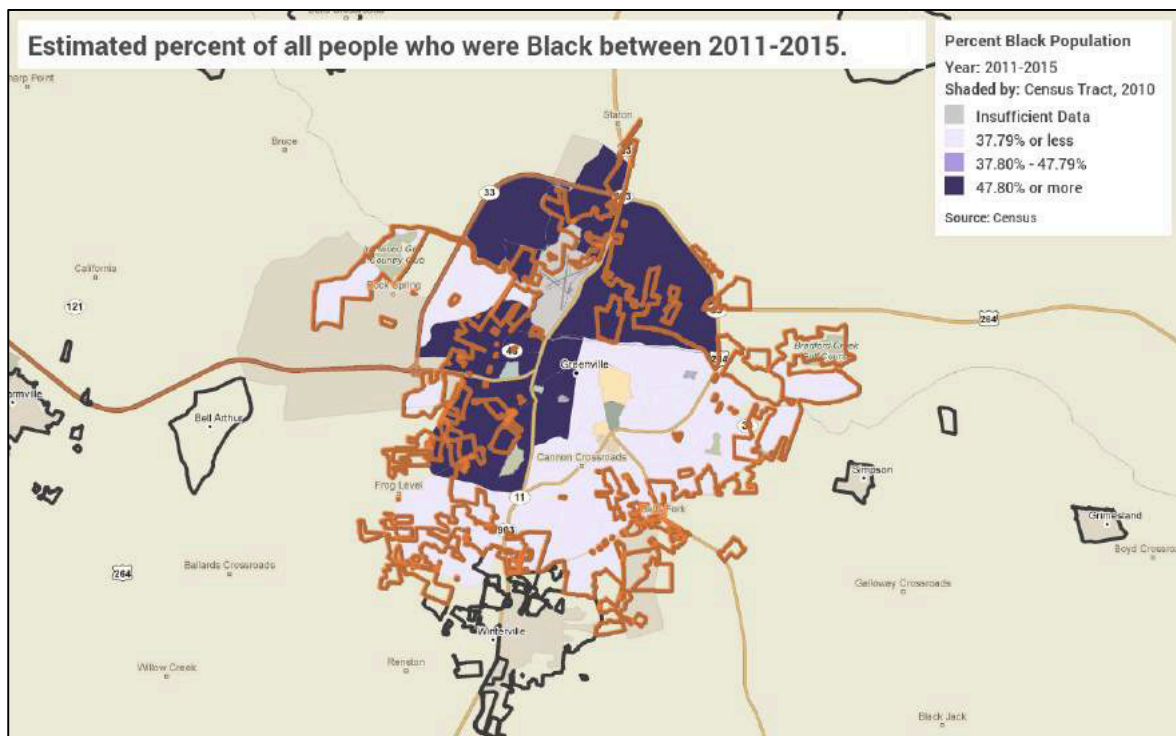
(Source: HUD AFH Data Table 6 – Publicly Supported Households by Race/Ethnicity)

b. Publicly Supported Housing Location and Occupancy

i. Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs in the jurisdiction and region.

According to HUD, a concentration is defined as the existence of ethnic/racial minorities in a census tract at a rate of 10 percent or higher than the city as a whole. In 2015, the population in Greenville was 37.8 percent black (2011-2015 ACS). A concentration of the race group would be a tract with 47.8 percent or higher population as the race group. Below is a map of areas where the black population is concentrated.

MAP – Black Population, Concentration



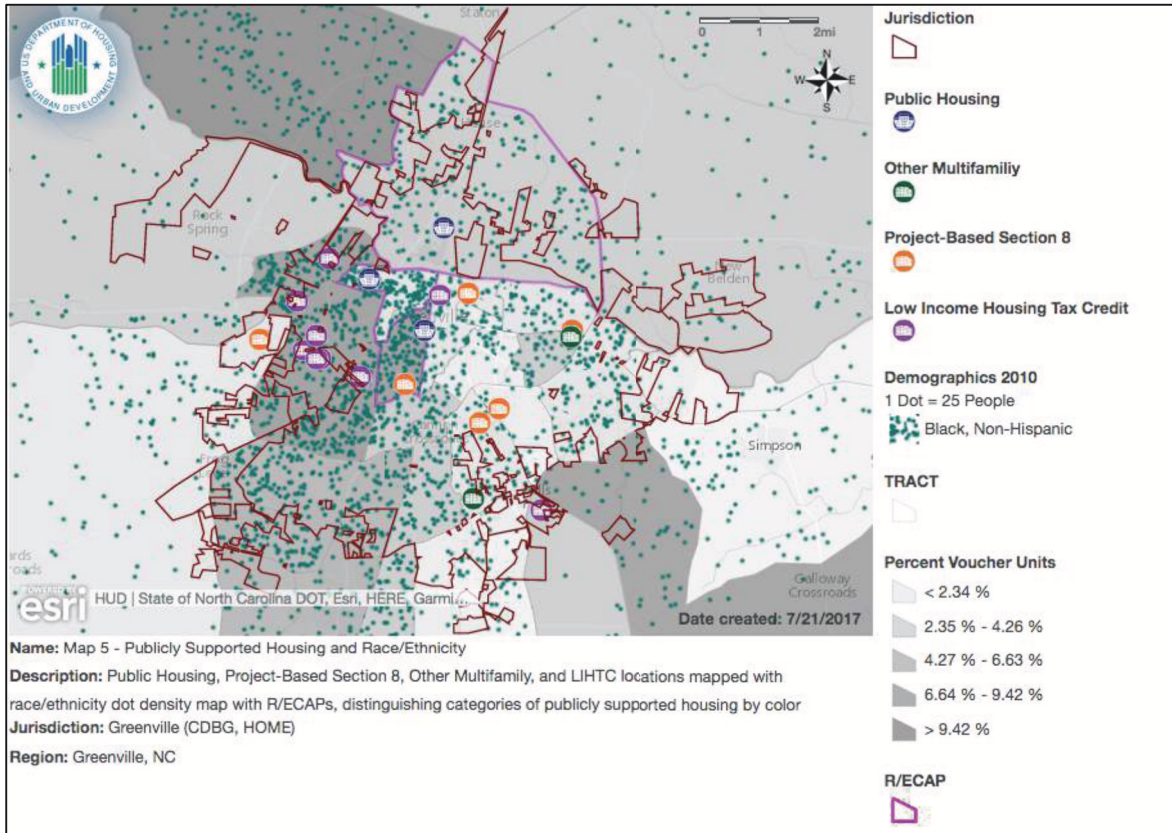
Source: 2011-2015 ACS via PolicyMap

The black population can be found concentrated mainly in areas surrounding Pitt-Greenville Airport and down to R/ECAP tract 3714700702 and to the western areas of the city.

Public Housing

The map below displays visually the geographic location of publicly supported housing in the city as it relates to areas where the black population is concentrated.

HUD Map 5 – Publicly Supported Housing and Race/Ethnicity, Black Population



Source: HUD

HUD Map 5 shows the concentration of blacks in the city by dot density (1 Dot = 25 People). The dot density map along with a percentage/concentration map offers a more complete picture of the location of each race group in the city. Correlation between the concentration and density of the population can provide important details in identifying appropriate priority areas. Currently, all three public housing developments are located directly in R/ECAP tracts. They are Kearny Park on W 14th Street in Census Tract 37147000702, Moyewood Park I on Roundtree Drive in Census Tract 37147000701 and Hopkins Park on Moore Street in Census Tract 37147000800. The public housing developments are all located in areas where there is a concentrated black population. While all three tracts have a concentration of blacks, R/ECAP tract 37147000800 has fewer people living in the tract – meaning there are also fewer blacks in general.

Housing Choice Vouchers

The percentage of HCV Program participants is highest in Census Tracts 37147000601, 37147000602 and 3714700000702, which is a R/ECAP Tract. These are also tracts where there are a large number of blacks. (Data Source: HUD AFH Map 5)

Project-Based Section 8

Project-based Section 8 housing units are more spread out throughout the city, however they are also located in areas where there are concentrations of blacks. There is a Section 8 housing unit located in R/ECAP tract 37147000702 (Carolina Cove Apartments on Lakeview Terrace).

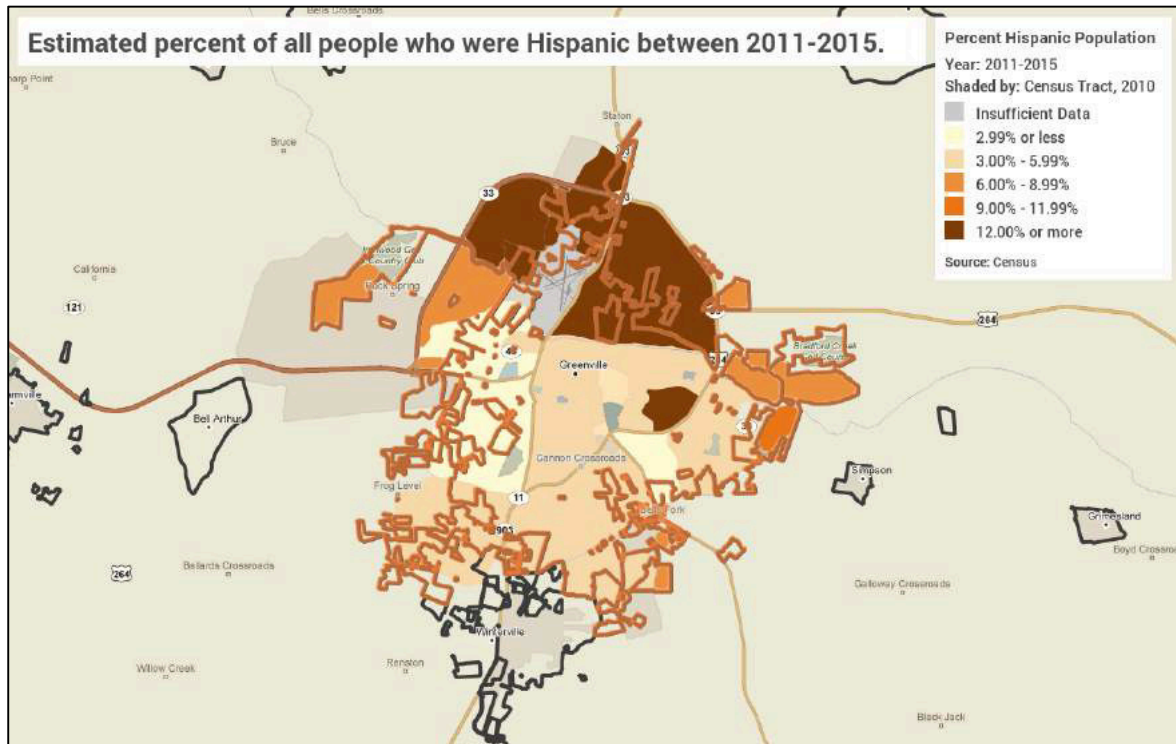
Low-Income Housing Tax Credit and Other HUD Multifamily Units

LIHTC housing is concentrated on the western tracts of the city and are also in close proximity to areas where there are concentrations of blacks. Other HUD multifamily housing units are located on the eastern side of the city where there are lower concentrations of blacks. This partly explains why there are fewer black households residing in that housing category than the other housing category types.

Hispanics and Publicly Supported Housing

According to HUD Table – Demographics, people who identify as Hispanic make up 4 percent of the population in Greenville. While there are no distinctly concentrated areas with a Hispanic population, they can still be found in larger numbers north of Pitt-Greenville Airport and the Tar River. Another pocket of Hispanics can be found just east of East Carolina University along ALT-264.

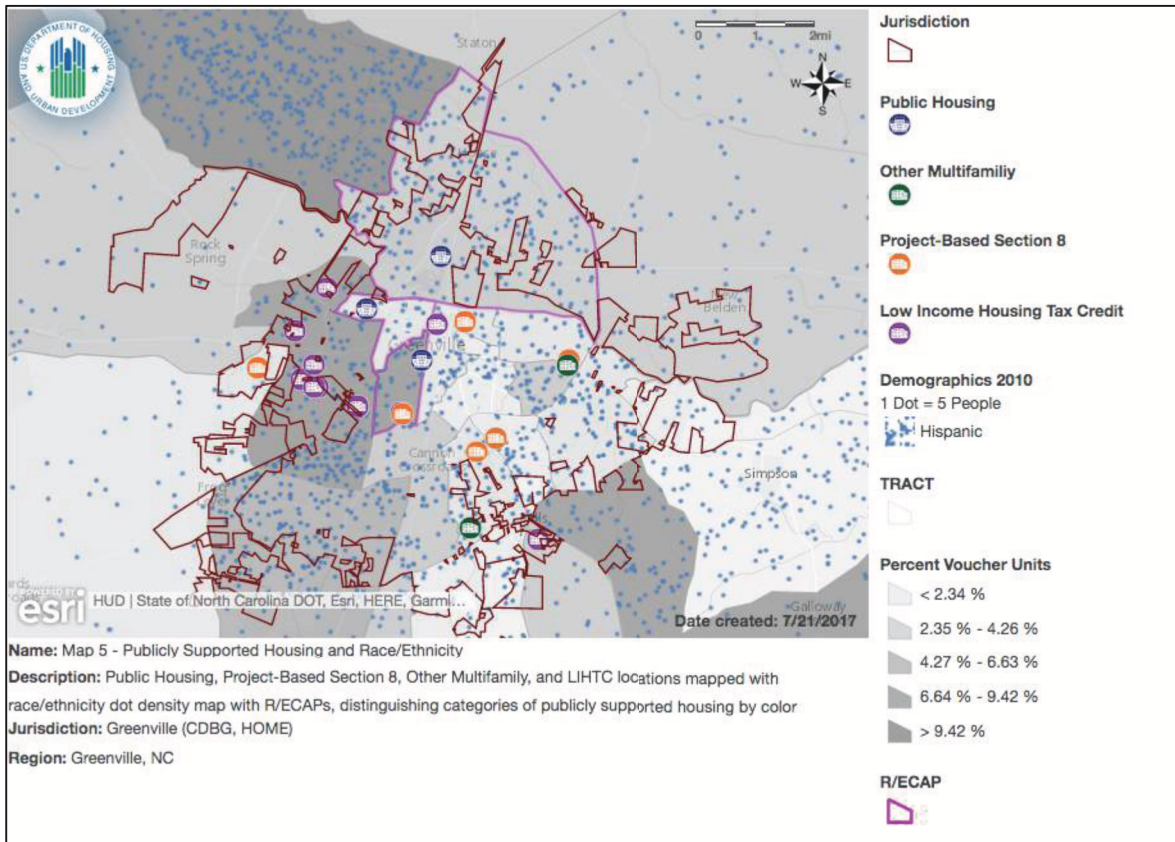
MAP – Hispanic Population



Source: 2011-2015 ACS via PolicyMap

There are several Section 8 housing units, LIHTC and other HUD multifamily units in close proximity to areas with a larger percentage of Hispanics. Public housing development, Hopkins Park located on W. Moore Street, is located in the R/ECAP tract 37147000800, of which 14.8 percent of the population is Hispanic.

HUD Map 5 – Publicly Supported Housing and Race/Ethnicity, Hispanic Population



Source: HUD

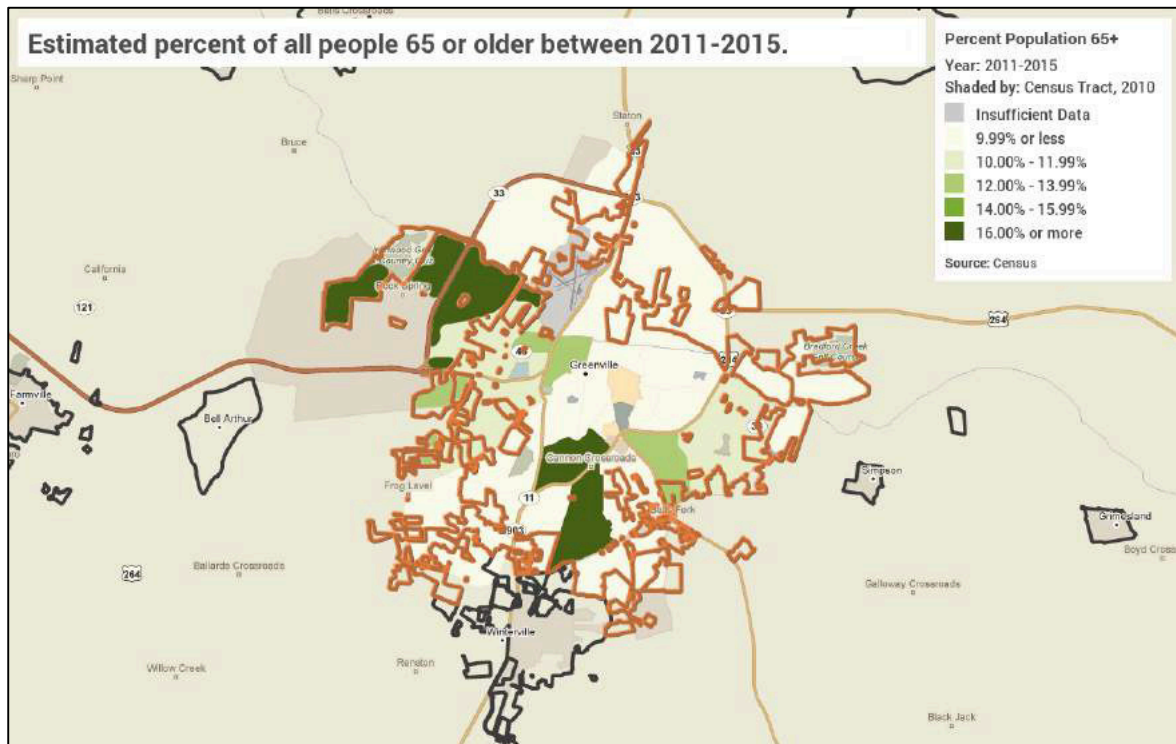
ii. Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs in the jurisdiction and region.

A description of each group can be found below as each group differs:

Elderly

Elderly, defined as 65 years and older, make up 8.8 percent of the population; however, they are not distributed evenly across the city. Elderly can be found in larger concentrations west of the airport and in the southern-central area of the city near Greenville Boulevard S.W. and along Evans Street.

MAP – Elderly Population



Source: 2011-2015 ACS via PolicyMap

According to HUD Map 5, there are no public development units, Project-based Section 8, or LIHTC housing in these area and HCV Program participant rate is also relatively low. (Data Source: HUD AFH Map 5, HUD AFH Table 7)

Families with Children

According to the HUD AFH Table 1 – Demographics, there were 8,351 families with children in Greenville – approximately 47.9 percent of family types in the city. The average family size was 2.98 persons, lower than the state average family size of 3.12 persons (2011-2015 ACS – S1101). With regard to publicly supported housing, the percentage of families with children in public housing varied depending on housing category.

For public housing developments, 57.4 percent of the residents were families with children – higher than the general population estimates for the family type.

Project-Based Section 8 housing was found in both R/ECAP tracts and non-R/ECAP tracts. In R/ECAP tracts, residents that were families with children were 55.6 percent – higher than the general population estimates for the family type. In non-R/ECAP tracts, however, they represented only 10.6 percent of the residents.

HCV program participants were also located in both R/ECAP and non-R/ECAP tracts. The percent of families with children in the HCV Program in non-R/ECAP tracts was 49.5 percent – slightly lower compared to the percent of families with children in the general population. Families with children, however, made up 58.8 percent of program participants in R/ECAP tracts.

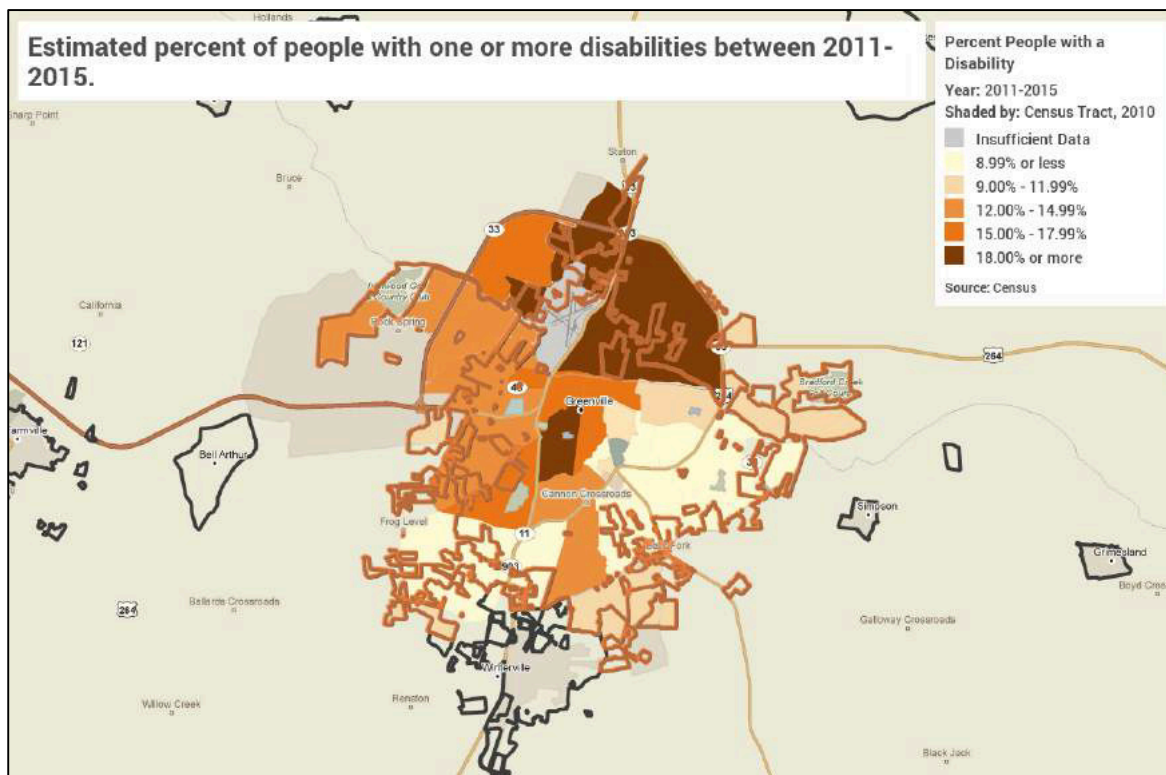
There were no families with children in other HUD multifamily units as these are generally reserved for elderly residents or individuals with a disability. (Data source: HUD AFFH Table 7 – R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category)

Disability

According to HUD Table 14 – Disability by Age Group, 10.6 percent of the population age 5 and older in Greenville had a disability. People with disabilities were spread out unevenly across the city, although a higher percentage of such residents were in the north and in R/ECAP tracts 37147000701 & 37147000702. In general, the northwest half of Greenville had a higher percentage of people with disabilities than the southeast half of the city.

Publicly supported housing is concentrated in the northeast area of the city where there are more people with disabilities; however, there are no units east of N. Greene Street/north of Tar River.

MAP – Disability



Source: 2011-2015 ACS via PolicyMap

iii. How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPs in the jurisdiction and region?

According to HUD Table 7 - R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category, only two types of publicly supported housing were recorded in both R/ECAP tracts and non-R/ECAP tracts in Greenville – Project-based Section 8 and the HCV Program. Below is a description of the demographic composition of Section 8 housing and the HCV Program in R/ECAP tracts as compared to those in non-R/ECAP tracts.

Project-Based Section 8

Far more Section 8 units were located in non-R/ECAP tracts compared to units within R/ECAP tracts in Greenville. There were only 19 occupied units in R/ECAP tracts compared to 348 occupied units in non-R/ECAP tracts. Elderly had far more representation in non-R/ECAP tracts with 86.3 percent of units, compared to just 5.6 percent in R/ECAP tracts. Persons with a disability also had a higher representation in non-R/ECAP tracts with 24.1

percent of units, compared to 11.1 percent in R/ECAP tracts.

By contrast, blacks had more households represented in R/ECAP tracts with 100 percent, compared to 66.7 percent in non-R/ECAP tracts. There were also more families with children in R/ECAP tracts (55.6 percent), than in non-R/ECAP tracts (10.6 percent). (Data source: HUD AFH Table 7)

HCV Program

There were also more HCV Program units located in non-R/ECAP tracts compared to units within R/ECAP tracts in the city. Only 99 occupied units in R/ECAP tracts compared to 573 occupied units in non-R/ECAP tracts.

Blacks had slightly more households represented in R/ECAP tracts with 97 percent in HCV Programs, compared to 96 percent in non-R/ECAP tracts. There were also fewer families with children in R/ECAP tracts in HCV Programs with 58.8 percent, compared to 49.5 percent in non-R/ECAP tracts. (Data source: HUD AFH Table 7)

Elderly had a slightly lower representation in R/ECAP tracts with 17.7 percent of units in HCV Programs, compared to 18.1 percent in non-R/ECAP tracts. Persons with a disability also had a lower representation in R/ECAP tracts with 14.7 percent of units in HCV Programs, compared to 21.6 percent in non-R/ECAP tracts.

iv. (A) Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category for the jurisdiction? Describe how these developments differ.

The Rental Assistance Demonstration was created in order to give public housing authorities the ability to preserve and improve public housing properties and address maintenance issues. The Low-Income Housing Tax Credit (LIHTC) is a resource for creating affordable housing in the city. With these programs come some basic requirements involving fair housing and protecting some classes and low- and moderate-income households.

Approximately 34.6 percent of the households in Greenville were black households, but the race group was represented in higher percentages in publicly supported housing units. Hispanic households represented 3 percent of the total percent of households in the city, but fewer than 1 percent of residents were from the ethnic group. Below is a description of the demographic composition of the developments.

Public Housing Development

At this time, the public housing developments show very low diversity. According to HUD AFH Table 8, they are almost all black households. Families with children make up 55 percent or more of the development's residents, which is more than the city's rate of 46.9 percent. One percent or fewer of the residents were Hispanic or Asian.

Project-Based Section 8

There are five Project-based Section 8 development units spread across the city. Three of the of the five sites are 93 percent or higher black. One site has 98 percent families with children. Three percent of the households in Greentree are Hispanic, but the rest of the Section 8 housing had 1 percent or fewer Hispanic households. Asians accounted for 2 percent of households in Oxford Village Apartments, however no data are available for the other four Section 8 sites.

Other HUD Multifamily Assisted Housing

Residential demographics data was available for only Royal Heights. This unit was less segregated. The unit has 61 percent black households and 37 percent white households. (Data source: HUD AFH Table 8)

Table 8 - Demographics of Publicly Supported Housing Developments, by Program Category								
Development Name	PHA Code	PHA	# Units	White	Black	Hispanic	Asian	HHs with Children
Public Housing								
(Greenville, NC CDBG) Jurisdiction								
Moyewood I	NC022	HACG	228	1%	96%	1%	N/a	64%
Kearney Park	NC022	HACG	238	1%	99%	0%	N/a	55%
Hopkins Park	NC022	HACG	248	1%	97%	1%	N/a	54%
Project-Based Section 8								
(Greenville, NC CDBG) Jurisdiction								
Grhi, Dba Oxford Village Apts.	N/a	N/a	288	40%	56%	1%	2%	N/a
Greentree	N/a	N/a	40	3%	95%	3%	N/a	98%
University Towers	N/a	N/a	60	5%	93%	0%	N/a	N/a
Carolina Cove	N/a	N/a	20	0%	100%	0%	N/a	56%
Arc/Hds Pitt Co Hous Corp #2	N/a	N/a	6	N/a	N/a	N/a	N/a	N/a
Other HUD Multifamily Assisted Housing								
(Greenville, NC CDBG) Jurisdiction								
Royal Heights Housing, Inc.	N/a	N/a	40	37%	61%	0%	N/a	N/a
Pitt County Group Home 03	N/a	N/a	0	N/a	N/a	N/a	N/a	N/a
<p>Note 1: For LIHTC properties, this information will be supplied by local knowledge.</p> <p>Note 2: Percentages may not add to 100 due to rounding error.</p> <p>Note 3: Data Sources: APSH</p> <p>Note 4: Refer to the Data Documentation for details (www.hudexchange.info).</p>								

(B) Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing for the jurisdiction and region.

Below is a description of the HCV Program as it relates to blacks and Hispanics in the city.

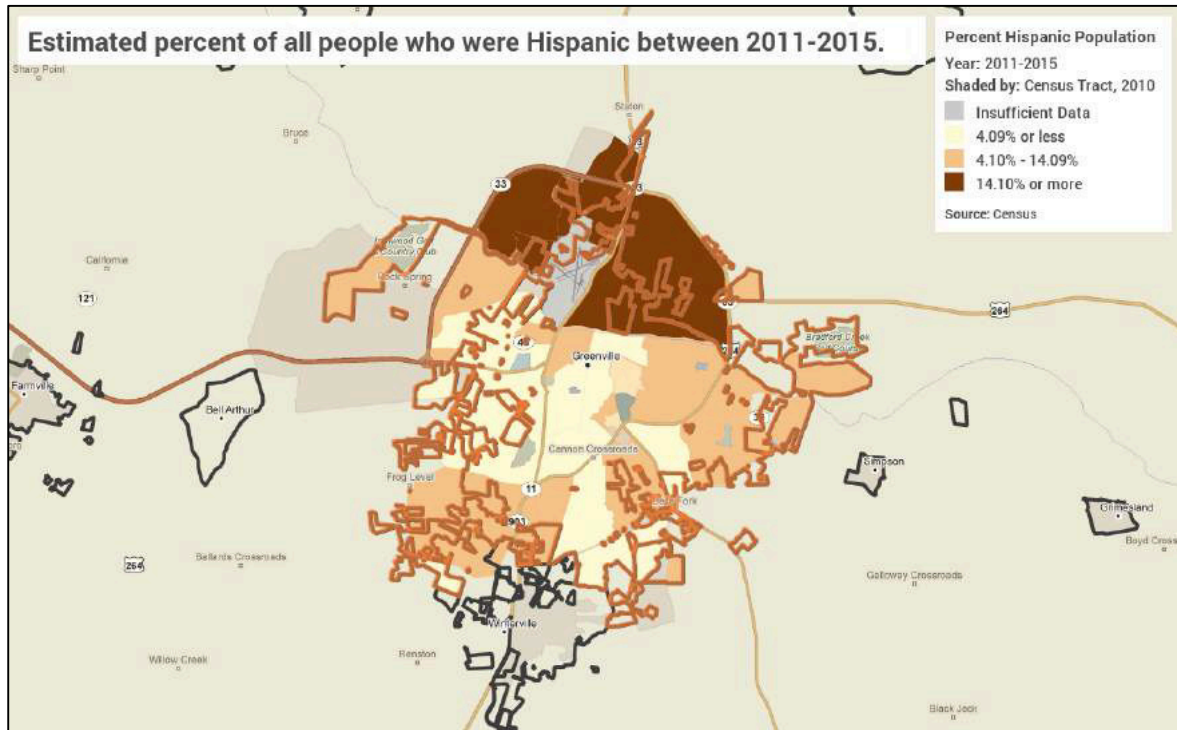
Black Households in the HCV Program

According to HUD Table 7, the HCV Programs has 97 percent of black households in R/ECAP tracts and 96 percent in non-R/ECAP tracts. This is much higher than the actual percentage of black households in the city (34.6 percent). The HCV Program also has highest usage of vouchers in areas where there is a concentration of the race group (western area of Greenville). As black residents made up the large majority of voucher users, the race group generally had a higher percentage of families with children, elderly and persons with a disability when compared to each respective group in the general population in Greenville.

Hispanic Households in the HCV Program

Hispanic households made up fewer than half of a percent of HCV Program participants. They made up 3 percent of the households in the city, however. HCV Program usage was also sparse in areas where there were a higher concentration of individuals who identified as the ethnic group. This area was just north and east of Pitt-Greenville Airport. HCV Program usage was highest in the R/ECAP tract and areas west of the R/ECAP.

MAP – Hispanic Population, Concentration

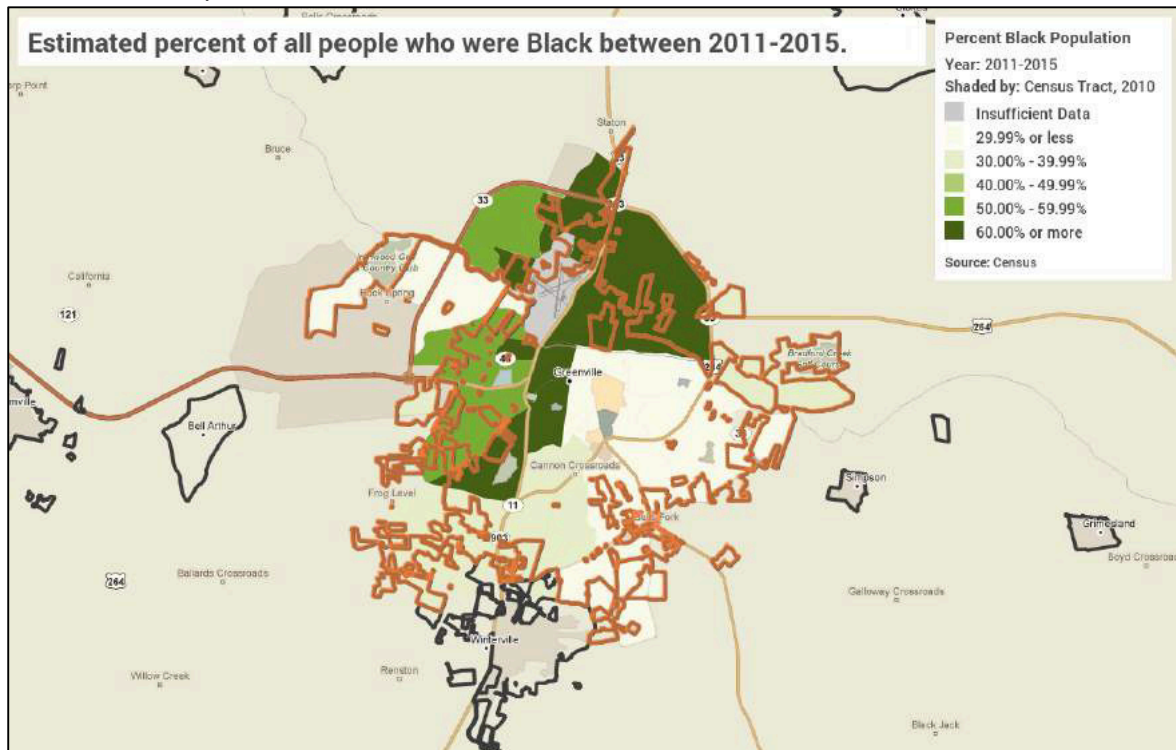


Source: 2011-2015 ACS via PolicyMap

v. Compare the demographics of occupants of developments in the jurisdiction, for each category of publicly supported housing (public housing, project-based Section 8, Other Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. For the jurisdiction, describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.

According to the 2011-2015 ACS via PolicyMap, in the majority of the northwest area of Greenville, 50 percent or more of the population is black. More than 60 percent is black in tracts that followed Route 13 from ALT-264 north to Pitt-Greenville Airport.

MAP – Black Population



Source: 2011-2015 ACS via PolicyMap

Public Housing Development

All three public housing developments are located in the northwest area of the City. These areas have also been identified as tracts that had a concentrated black population. Kearny Park, located in Census Tract 37147000702 (R/ECAP tract), has 99 percent black households residing and the tract has a population that is 87.7 percent black. Moyewood I is located in

Census Tract 37147000701, and has 96 percent black households residing and the tract has a population that is 82.2 percent black. Finally, Hopkins Park is with 97 percent black residents and is located in Census Tract 37147000800 with the tract having a 67.5 percent black population.

There are generally more households with children, elderly and persons with disabilities residing in the public housing developments than each of these protected groups among the general population. In public housing development units, families with children comprised 57.4 percent of the general population of the city, while families with children made up 46.9 percent of the population. Of the residents in the units, 23.3 percent were elderly (representing 9 percent of the general population) and 16.9 percent were those with disabilities (representing 10.6 percent of the general population).

Project-Based Section 8

Project-based Section 8 housing can be found throughout the city, and is not necessarily concentrated in areas where the percentage of blacks is highest. Despite this, blacks still make up at least 90 percent or more of three units including 100 percent at two of these units. Hispanics and Asians make up a very small number of the residents for Section 8 housing. Below is a table comparing each Section 8 housing unit and a description of its location.

Section 8 Housing Unit and Location			
Site	Census Tract	Unit Percent Black	Census Tract Percent Black
Greenpointe Regional Housing	37147001600	57.0	10.0
Carolina Cove Apartments	37147000702	100.0	87.7
University Towers	37147000100	92.0	36.0
Wedgewood Arms Apartments	37147000502	20.0	19.6
Arc/Hds Pitt County Group Home	37147000301	N/A	N/A
Greentree Village Apartments	37147000201	100.0	19.4
Source: HUD Map 5, PHA and Race/Ethnicity			
Data Note: Differences between HUD Map 5 and HUD Table 8 is due to sourcing differences from the Inventory Management System (IMS) and PIH Information Center (PIC).			

Other HUD Multifamily

According to HUD AFH Map 5, other HUD multifamily units are Ashton Place and Arc/Hds Pitt County Group Home 3. These two units are located on the east side of the city. Ashton Place has 48 percent black residents and is located in Census Tract 37147000201, which is

83.7 percent black. Arc/Hds Pitt County Group Home 3 is located in Census Tract 37147000502. No data is available for this housing unit.

HCV Program

The highest percentage of HCV Program voucher units are located in the R/ECAP tract (Census Tract 37147000702) and west of the tract and on to the border. The west side of Greenville is also where there is a large percentage of the black population, which correlates with the high use of vouchers for the race group in general (96.5 percent). According to HUD Map 5, Hispanics populate some of the areas with a higher percentage of voucher usage, such as Central Tract 37147000602 south of the R/ECAP with 7.9 percent of the population in the tract, but they have very little participation in the HCV program.

(Data Source: HUD AFH Table 7 & 8, HUD AFH MAP 5)

c. Disparities in Access to Opportunity

- i. Describe any disparities in access to opportunity for residents of publicly supported housing in the jurisdiction and region, including within different program categories (public housing, project-based Section 8, Other Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.**

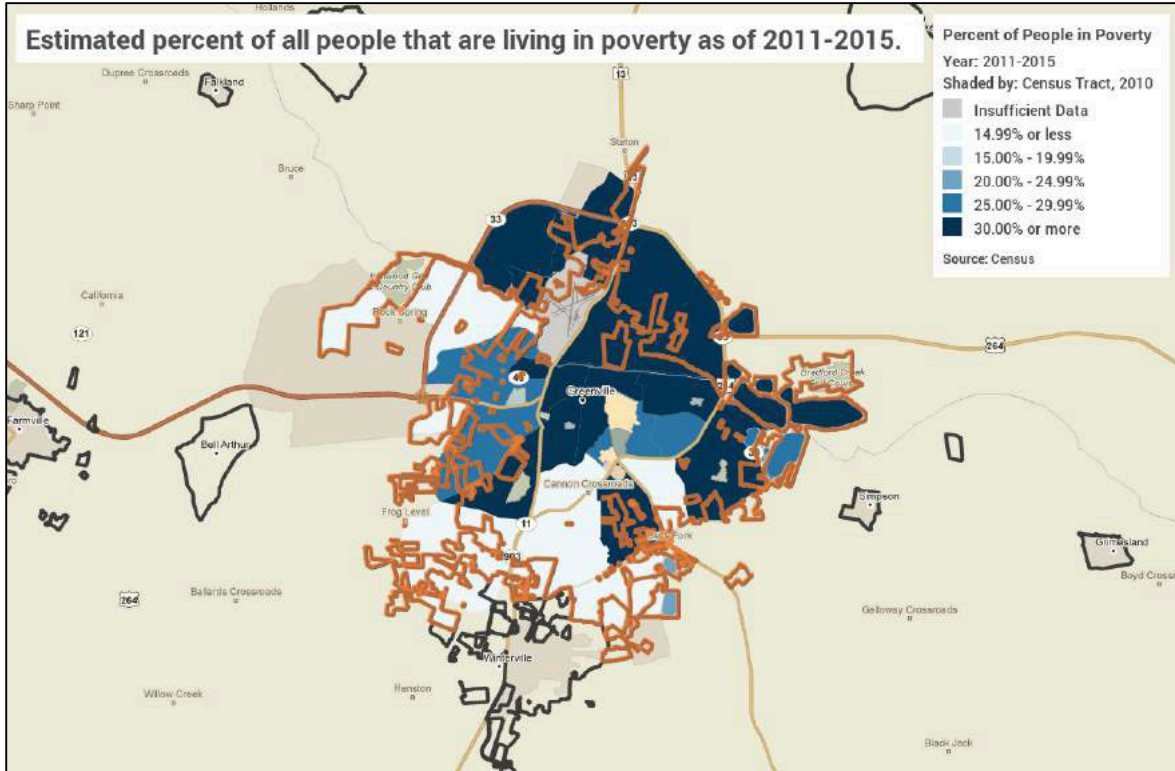
Access to High Wage Jobs

Based on the HUD AFH Maps, areas with high concentrations of public housing developments, Project-Based Section 8, and LIHTC housing fall mostly within the areas with a high percentage in the Job Proximity Index, which, according to HUD, measures the physical distance between place of residence and jobs. The Jobs Proximity Index is highest east of the airport and south along Route 13. Other areas such as the east side of the R/ECAP tract and tracts west of the R/ECAP also display high jobs proximity. (Source: HUD AFH MAP 5 & 8)

While the Job Proximity Index is high in these areas, they also are some of the areas with the highest poverty rate in the city. Almost all types of publicly supported housing fall within or in close proximity to areas where the poverty rate is higher than 25 percent. A large portion of the city has areas that experience as much as 30 percent of residents living

in poverty. This points to a lack of high wage jobs in these areas for many residents in Greenville, especially for those living in publicly supported housing.

MAP – People Living in Poverty

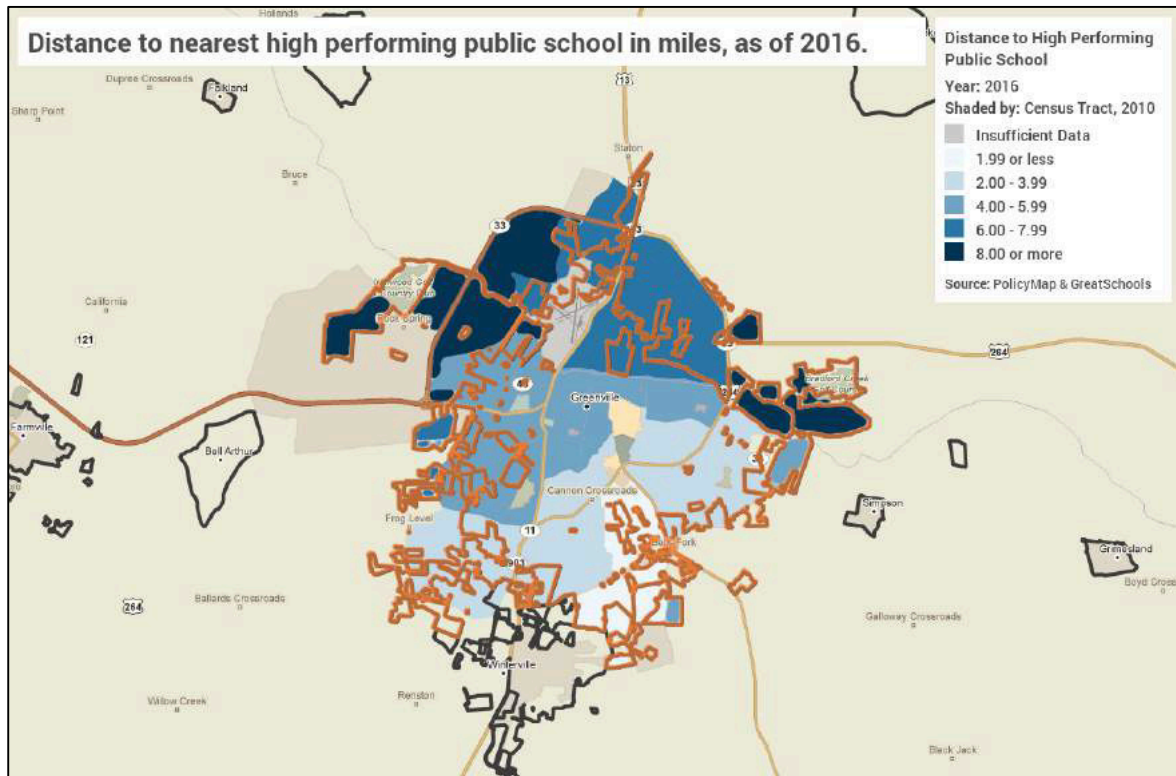


Source: 2011-2015 ACS via PolicyMap

Access to High Performing Schools

Blacks are not finishing college at the rate of the general population in Greenville. According to the 2011-2015 ACS (C15002), in 2015 only 17.4 percent of blacks 25 years and older had a bachelor’s degree or higher, which is well below the citywide rate of 38 percent. As blacks represent 35.7 percent of the total population of the city (HUD AFH Table 1), when the race group is removed from the citywide percentage of those with a bachelor’s degree or higher, the disparity can be expected to increase. Preparing students to succeed in college starts at primary and secondary schooling. High performing public schools (elementary through high school) are vital for the development of students. (Source: 2011-2015 ACS C15002B, S1501)

MAP – Distance to High Performing School



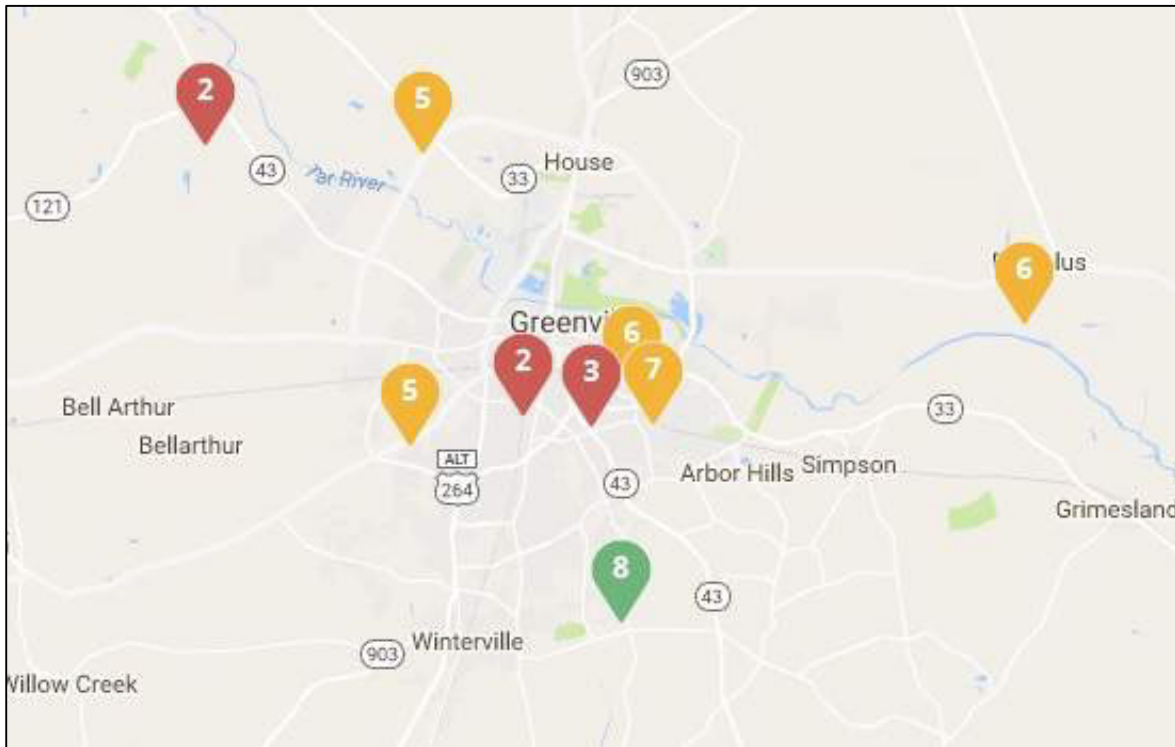
Source: 2016 GreatSchools via PolicyMap

Data Note: GreatSchools calculates school rating by averaging that school's ratings for all grade/subject combinations.

A higher percentage of blacks live in the northeast half of the city. This is also the location of areas furthest from high performing schools as reported by GreatSchools. GreatSchools is a nationally recognized non-profit that ranks public schools across the nation, provides profiles and also offers resources for parents and schools.

The following maps show the location of high- and low-performing schools in the city. Green markers indicate schools with a higher performance rating of eight or better, orange markers represent average performing schools of four to seven, and red markers are the lowest performing schools with a rating of three or less. Gray markers have no ranking. Schools are categorized into elementary, middle and high schools.

Elementary High/Low Performing Public Schools



Source: GreatSchools, 2016

According to GreatSchools, there is only one high-performing public elementary school in the city (Wintergreen Intermediate School). The rest of the public elementary schools in the city are average and low performing schools. Two low performing schools are located at the center of the city, with one inside the R/ECAP tract.

Middle School High/Low Performing Public Schools



Source: GreatSchools, 2016

The city has no low-performing public middle schools or high-performing schools.

High School High/Low Performing Public Schools



Source: GreatSchools, 2016

Data note: Schools with no rating were not included.

Public high schools in Greenville were average performing. While there were no low-performing public high schools in the city, there are also no high-performing public high schools in the area. The lowest performing high schools are located in the northwest area of the city where the highest concentrations of blacks reside.

Data note: GreatSchools calculates each rating by averaging that school's ratings for all grade/subject combinations.

2. Additional Information

- a. **Beyond the HUD-provided data, provide additional relevant information, if any, about publicly supported housing in the jurisdiction and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD-provided data.**

Other groups with protected characteristics not listed in the HUD provided data include the lesbian, gay, bisexual or transgender (LGBT) community, persons with criminal backgrounds and persons with HIV/AIDS and their families. Below is a description of these groups and their relation to publicly supported housing in Greenville.

Housing Discrimination against LGBT Individuals

The Fair Housing Act prohibits housing discrimination based on race, color, national origin, religion, sex, disability, and familial status, however it does not specifically include sexual orientation and gender identity as prohibited categories. HUD states, “Discrimination against a lesbian, gay, bisexual or transgender (LGBT) person may be covered by the Fair Housing Act if it is based on non-conformity with gender stereotypes. For example, if a housing provider refuses to rent to an LGBT person because he believes the person acts in a manner that does not conform to his notion of how a person of a particular sex should act, the person may pursue the matter as a violation of the Fair Housing Act’s prohibition of sex.”³

HUD also requires that housing providers that receive HUD funding be subject to HUD’s Equal Access Rule, which requires equal access to HUD programs. In February 2012, HUD released the Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity. Through the final rule, HUD has implemented policy to ensure all HUD programs, including publicly supported housing, were open to all eligible individuals and families regardless of sexual orientation, gender identity or marital status.

Compared to other protected groups, data for LGBT persons is difficult to collect for several reasons including the difficulty of defining an LGBT person and the parameters of what constitutes an LGBT person. The Williams Institute UCLA, a leader in research and publishing LGBT resource, identified same-sex couple households as an important measuring indicator. According to the institute, 142 family households were same-sex couple households in Greenville in 2010. This puts the group at 3.93 same-sex couples per

³ Ending Housing Discrimination Against LGBT and their Families, www.hud.gov, 2016

every 1,000 households – or one in every 254 households. While these numbers do not seem significant, housing discrimination is of great concern for the LGBT community. Polls conducted by the Williams Institute found that 81 percent of North Carolina residents think LGBT persons experience discrimination. Finally, while not a direct comparison, some LGBT persons still experience discrimination in the workplace because of their sexual orientation or gender identity. According to the institute, 77 percent of LGBT persons experienced being harassed or mistreated and 47 percent were not hired. (Source: The Williams Institute, UCLA)

Use of Criminal Records by Providers of Housing & Real Estate Transactions

On April 4, 2016, HUD's Office of General Counsel Guidance issued a guidance on the application of Fair Housing Act standards in relation to the use of criminal records by providers of housing and for real estate related transactions. The guidance addresses possible discrimination and disparate methods in Fair Housing cases in which a housing provider may refuse to rent or renew a lease based on an individual's criminal history. According to HUD, nearly one-third of the 100 million U.S. adults have a criminal record of some sort, many of whom having been incarcerated. When these individuals are released from prison or jail, their ability to access safe, secure and affordable housing is critical for their re-entry into the community. Many with criminal records, even those who were convicted but not incarcerated, face significant barriers including discrimination when seeking affordable housing (including publicly supported housing). Blacks and Hispanics are arrested, convicted and incarcerated at rates disproportionate to their share of the general population. HUD concludes: While the Act does not prohibit housing providers from appropriately considering criminal history information when making housing decisions, arbitrary and overbroad criminal history-related bans are likely to lack any legal sufficient justification. Thus, a discriminatory effect resulting from a policy or practice that denies housing to anyone with a prior arrest or any kind of criminal conviction cannot be justified, and therefore such a practice would violate the Fair Housing Act.⁴

Individuals with HIV/AIDS and their Families

According to the Center for AIDS Prevention Studies (CAPS) at the University of California San Francisco, one of the world's largest centers in HIV/AIDS research, individuals with the virus face stigma, which often leads to prejudice and discrimination. Much of this HIV/AIDS stigma is caused by misinformation and enduring ignorance.

⁴ Office of General Counsel Guidance on Application of Fair Housing Act Standards to the Use of Criminal Records by Providers of Housing and Real Estate-Related Transactions, HUD, 2016

Under HUD's Equal Access Rule, low-income persons with HIV/AIDS and their families may pursue public housing without discrimination and may be allowed reasonable accommodations for housing options. Persons with HIV/AIDS are also protected against discrimination in the sale and rental of housing and residential real estate. Under the Fair Housing Act and Section 504 of the Rehabilitation Act, persons with HIV/AIDS, who may have been discriminated against, can file a complaint with the local HUD office. HUD-funded public housing and other HUD-funded nonprofit development of low-income housing, or recipients of federal financial assistance would be subject to Section 504's non-discrimination requirements.

In 2015 the Housing Authority of the City of Greenville was provided funding to support 19 persons diagnosed with AIDS through HUD's HOPWA grant funds. HOPWA is a federally funded program that primarily provides housing assistance such as emergency shelter, transitional and permanent housing for lower income persons with HIV/AIDS.

b. The program participant may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or geographic mobility programs.

Housing Authority of the City of Greenville Programs

The Housing Authority of the City of Greenville (HACG) offers public housing services through its three properties and the Housing Choice Voucher (HCV) Program. Along with these affordable housing programs, the housing authority also provides a variety of affordable housing related programs. Below is a list of programs provided by HACG:

Partnership for Progress (PFP): PFP is an afterschool tutorial program designed for grades 1-3 who are not reading at grade level or who have been retained. The program is sponsored by the United Way of Pitt County with additional support from Pitt County Schools and HACG and tutoring services are at no charge to students in the program.

The Family Self-Sufficiency (FSS) Program: FSS is a voluntary program for participants in HACG's HCV and Public Housing Programs. Its purpose is to assist families receiving HCV rental assistance or living in public housing to improve their economic situation and reduce their dependence on public assistance and welfare.

HCV Home Ownership Program: HCV Program participants with the hope to improve their lives and move into homeownership have the option to apply for the Home Ownership Program which provides potential homebuyers with assistance towards the repayment of a mortgage loan for a maximum period of 15 years.

Neighborhood Network Program (NNP): NNP provides access to residents for information technology and economic opportunities to achieve long-term independence. The activities are located at the Career Connection Center, which provides computer access, adult education and youth programs. Programs are aimed at promoting self-sufficiency and independence.

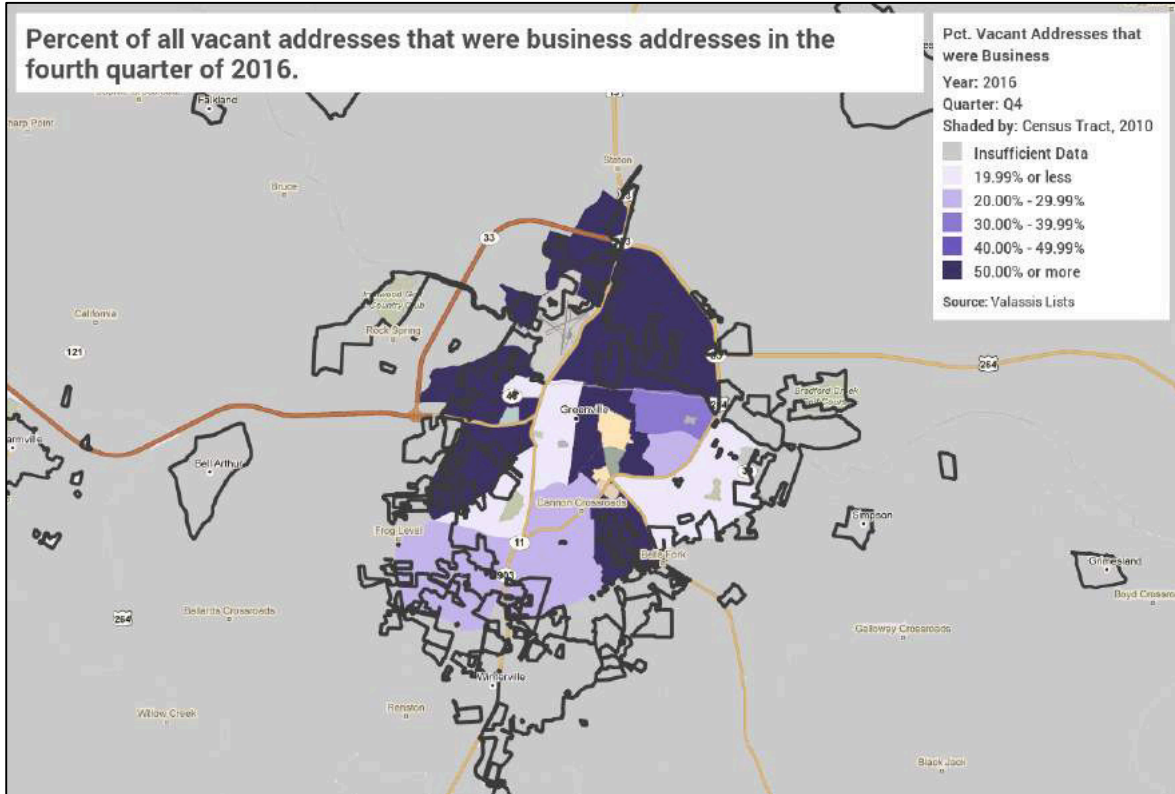
Cultural & Recreational Programs: Programs included in the Cultural & Recreational program includes the Education Program which offers a GED program and several tutoring programs, a Safe Haven Room which is equipped with a multimedia entertainment center along with current publications and magazines and also hosts a variety of programs such as movie nights and Teen Night, a Resource Room for a large selection of reading books and resource materials, a Computer Learning Lab, a Cultural Arts Program which provides the public housing community more access to special events, performance and festivals.

Lack of Private Investments in Areas with LIHTC Housing & HCV Program Usage

LIHTC is one of the most important resources for creating affordable housing in Greenville. The LIHTC program gives state and local LIHTC allocating agencies the ability to budget and have authority to issue tax credits for the acquisition, rehabilitation and new construction of rental housing targeted to low income households. The placement of LIHTC sites in coordination to planning that accounts for the economic wellbeing of low-income households is vital for keeping communities out of poverty. HCV Program participants are encouraged to seek housing in areas where there is less poverty and a better place to improve their lives. A lack of private investment in these areas do not work to improve their lives or keep these households out of poverty.

As seen in HUD Map 5 – Publicly Supported Housing, the vast majority of publicly supported housing and especially LIHTC housing sites are located in the northwestern area of the City. According to Valassis Lists, which records the number of business vacancies across the country, most of the northwestern half of the City had 50 percent or more business vacancies in Quarter 4 of 2016. While a high percentage of business vacancies is not the only indicator in a lack of private investments, it effects the overall sense of the economy in the area negatively.

MAP – Business Vacancies in Quarter 4, 2016

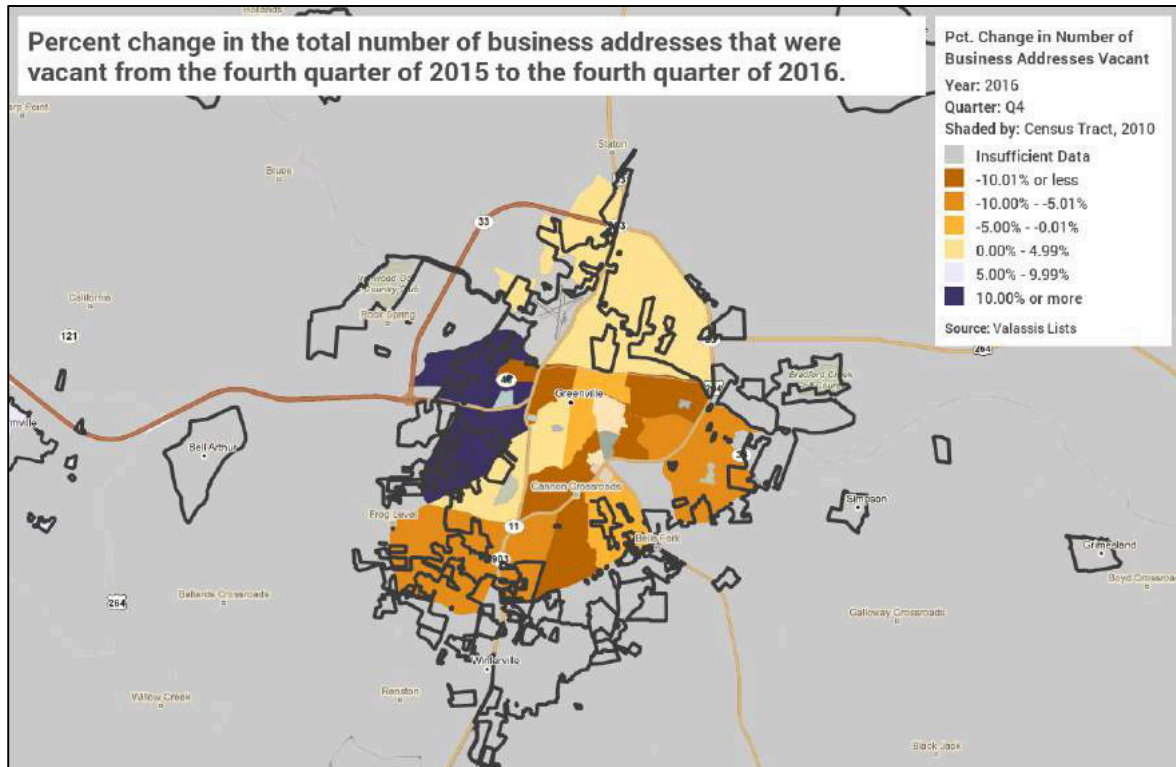


Source: Valassis Lists 2016 via PolicyMap

Data Note: Gray shaded areas have insufficient data.

The percentage of business vacancies is not the only indicator of a lack of private investment in an area, as having large parts of the City where businesses are constantly vacating also does not encourage new and existing businesses. In the map below, 10 percent or more business addresses became vacant from 4th quarter 2015 to 4th quarter 2016 on the western area of the City where LIHTC housing is located. By contrast, the rest of the business addresses in Greenville became less vacant in that time.

MAP – Percent Change in Number of Business Vacancies



Source: Valassis Lists 2016 via PolicyMap

The purple shaded area, Census Tract 37147000601 saw a change of 13.6 percent of business vacancies from the fourth quarter 2015 to fourth quarter 2016. The rest of the City saw -8 percent change of business vacancies, which means the number of business vacancies decreased throughout the City except for Census Tract 37147000601.

3. Contributing Factors-of Publicly Supported Housing Location and Occupancy

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.

- Admissions and occupancy policies and procedures, including preferences in publicly supported housing
- Community opposition
- Displacement of residents due to economic pressures
- Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking
- Impediments to mobility
- Lack of access to opportunity due to high housing costs
- Lack of meaningful language access
- Lack of local or regional cooperation
- Lack of private investment in specific neighborhoods
- Lack of public investment in specific neighborhoods, including services and amenities
- Land use and zoning laws
- Loss of Affordable Housing
- Occupancy codes and restrictions
- Quality of affordable housing information programs
- Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs
- Source of income discrimination
- Other

Admissions and occupancy policies and procedures, including preferences in publicly supported housing: As noted above, the publicly supported housing is located in majority Black neighborhoods. According to HUD, public housing developments and residents using HCV housing vouchers are almost entirely Black households pointing to at least some level of segregation along racial lines. Access to public housing developments is not dependent on race, but because of location or preference, the developments are predominantly Black. This is also true for most Project-based Section 8 housing sites in the City.

By contrast, while much smaller as a percentage of the total population in Greenville, qualified Hispanic households that meet the income requirements set by HUD for publicly

supported housing are not utilizing these programs. There are 135 extremely low-income (0-30 percent AMI), 220 low-income (0-50 percent AMI), and 595 moderate-income (0-80 percent AMI) Hispanic households in the city, however only 10 Hispanic households use publicly supported housing programs. As the Hispanic population is one of the fastest growing communities in Greenville, it is pertinent that they find adequate and affordable housing that suits their needs. Broadening services to include Hispanics may require a new approach to the community and new services and activities. (Data Source: HUD AFH Table 6 – Publicly Supported Households by Race/Ethnicity)

Impediments to mobility: The lack of access to high performing schools creates a barrier to advancement of students in Greenville, especially the northwestern areas of the city. Having limited access to high performing schools is a contributing factor to low college education participation rates, and therefore low education attainment. Educational attainment is directly tied to earnings, which is a key part in income mobility.

According to the 2011-2015 ACS, only 17.4 percent of blacks 25 years and over had a bachelor's degree or higher, which is below the citywide rate of 38 percent. As of 2015, persons with a bachelor's degree in Greenville earned \$37,386, while persons with only a high school education earned \$23,414 annually. With fewer blacks graduating with a bachelor's degree – likely resulting in lower incomes for individuals and families – disparities in access to opportunities such as high paying jobs and a lack of affordable housing will continue to persist in this community.

Lack of meaningful language access & Quality of affordable housing information programs: Hispanic households occupy fewer than 1 percent of publicly supported housing units, but Hispanic households account for 2.3 percent of extremely low-income households and 2.3 percent of low-income households in Greenville. The city must be proactive in its efforts to open a dialogue with these groups to better understand why publicly supported housing is not benefitting the Hispanic community.

Lack of Private Investment in Specific Neighborhoods: There is a disparity in private investment in the northwest and western area of Greenville compared to the rest of the city. While not a perfect indicator of a lack in private investment in an area, this part of the city has several areas with a very high percentage of business vacancies in commercial business locations. Business vacancies are also increasing in the western area of Greenville as opposed to the rest of the city. Furthermore, these neighborhoods are where there is a greater concentration of LIHTC and HCV Program residents.

D. Disability and Access Analysis

1. Population Profile

a. **How are persons with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?**

According to the AFH Table 13 – Disability by Type, six types of disabilities were recorded in Greenville. The most prevalent was ambulatory difficulty (5.5 percent), followed by cognitive difficulty (4.6 percent), independent living (3.5 percent), self-care (2.4 percent), hearing difficulty (2.2 percent), and vision difficulty (2.1 percent).

Table 13 - Disability by Type

Disability Type	(Greenville, NC CDBG, HOME) Jurisdiction		(Greenville, NC) Region	
	#	%	#	%
Hearing difficulty	1,751	2.17%	4,439	2.81%
Vision difficulty	1,719	2.13%	3,843	2.43%
Cognitive difficulty	3,684	4.57%	8,207	5.20%
Ambulatory difficulty	4,460	5.53%	11,207	7.10%
Self-care difficulty	1,940	2.41%	4,674	2.96%
Independent living difficulty	2,854	3.54%	7,225	4.57%

Note 1: All % represent a share of the total population within the jurisdiction or region.
 Note 2: Data Sources: ACS
 Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

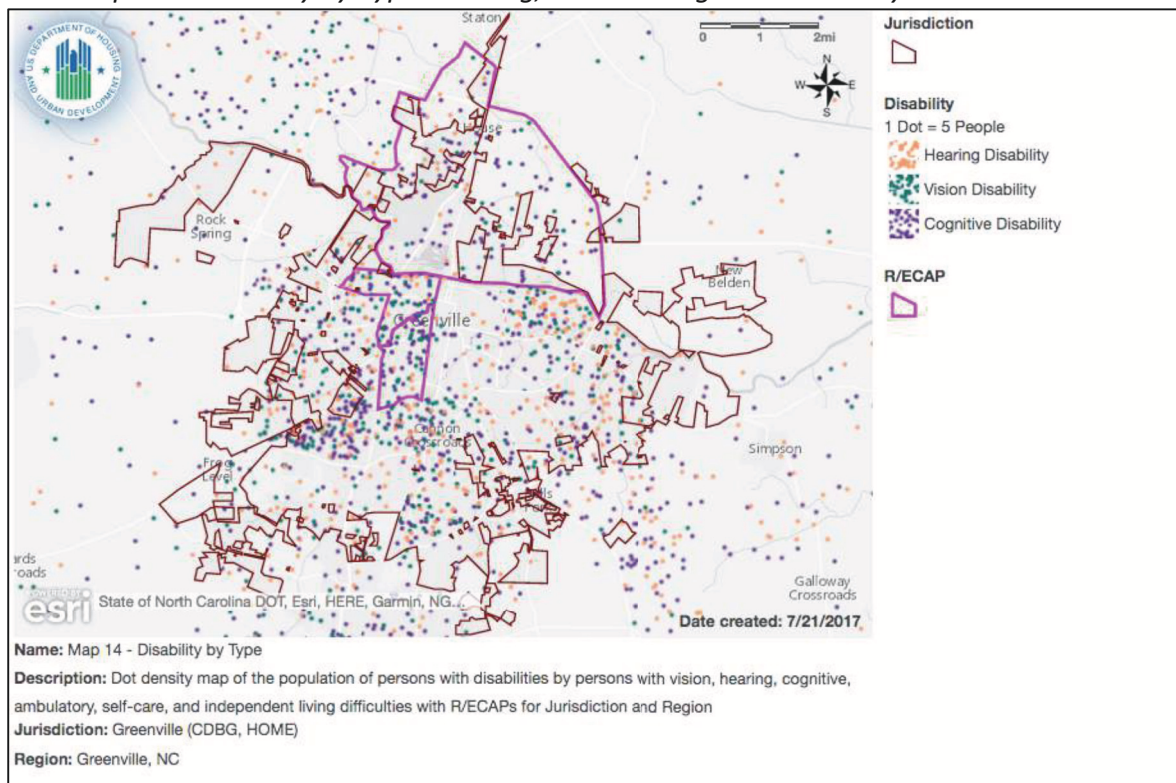
When referenced with the HUD AFH maps, several Census Tracts had more persons with a disability than others. The table below shows where these tracts are.

Census Tracts with Concentration of Disabled		
Census Tract	Location Description	Prominent Disabilities
37147000201	Northeast: From Elm St. to Greenville Blvd, and E 10 th Street up to Tar River	Hearing
37147000302	Northeast: From Greenville Blvd to the eastern city limits, and from E Fire Tower Rd up to the Tar River.	Hearing, Ambulatory
37147000501	South central: From Memorial Drive and SW Greenville Blvd to Queen Anne’s Rd., and from Fire Tower Rd up to R/ECAP tract.	Vision, Cognitive
37147000602	West: Southwest of R/ECAP to SW Greenville Blvd.	Cognitive, Ambulatory, Self-Care, Independent Living
37147000701	R/ECAP tract: Northwest area, from Route 13 to Greene St., and north to the Tar River	Ambulatory, Independent Living
37147000702	R/ECAP tract: Just west off the center of the City.	Vision, Cognitive, Ambulatory, Self-Care

Source: HUD

HUD Map 14 – Disability by Type: Hearing, Vision and Cognitive Disability visually displays the location where these disability types are more prevalent. Individuals with hearing disability are found throughout the city, with a cluster the northeast area of Greenville (Census Tract 37147000201). Individuals with vision disability can also be found in higher numbers in R/ECAP tracts 37147000701 and 37147000702 (the two R/ECAPs south of the airport). Individuals with cognitive disability are found in higher numbers in the same two R/ECAP tracts and Census Tract 37147000602 southwest of the R/ECAPs. Census Tract 37147000602 has one of the highest concentrations of persons with a disability in the city along with R/ECAP tracts 37147000701 and 37147000702.

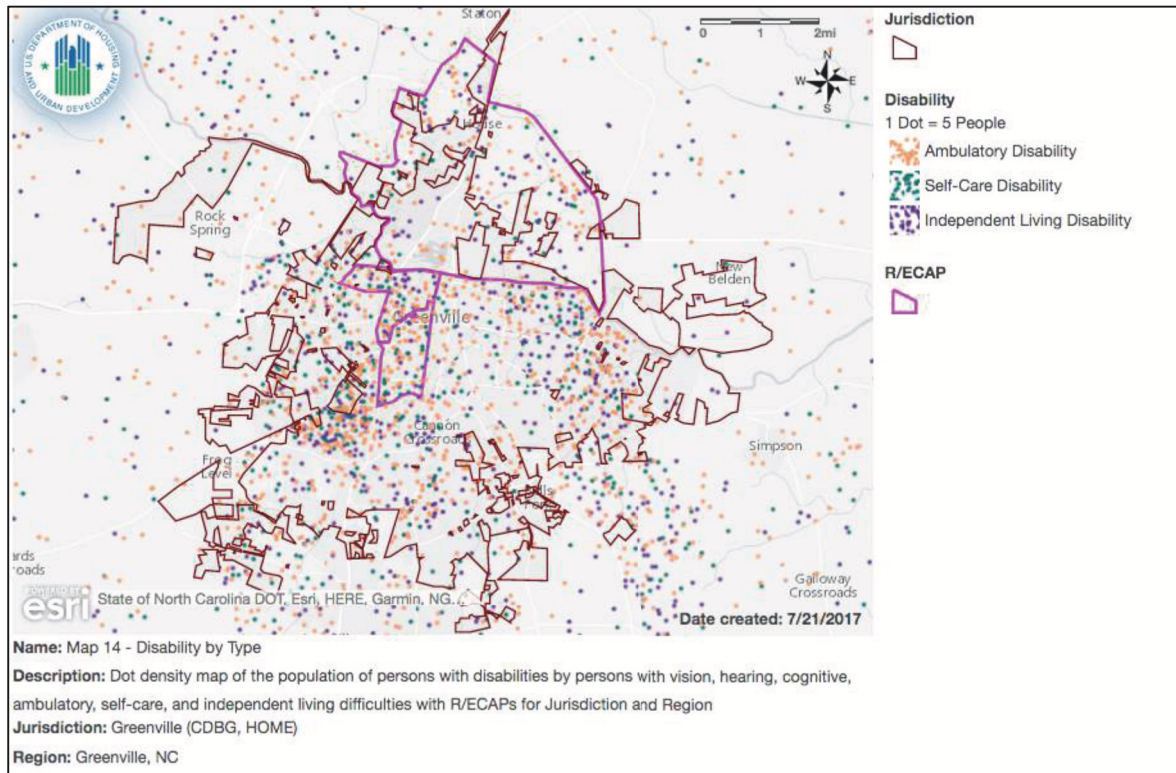
HUD Map 14 – Disability by Type: Hearing, Vision & Cognitive Disability



Source: HUD

Some of the northwest tracts of the city have the highest number of persons with ambulatory, self-care and independent living disabilities. These tracts are Census Tract 37147000602, 37147000701 (R/ECAP) and 37147000702 (R/ECAP). Individuals with ambulatory disability can also be found in larger numbers along the northeast part of the city just south of the Tar River (Census Tract 37147000201 & 37147000302).

HUD Map 14 – Disability by Type: Ambulatory, Self-Care & Independent Living Disability

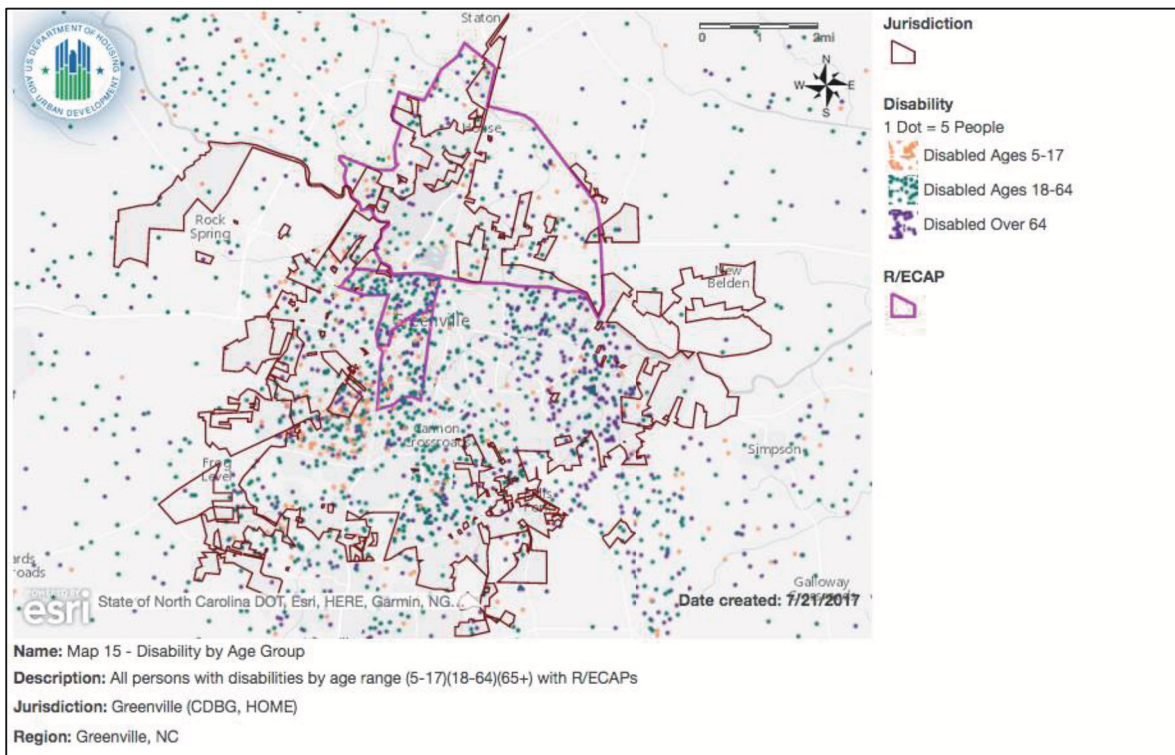


Source: HUD

b. Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges for the jurisdiction and region.

Three of the northwestern tracts in the Greenville have the highest concentration of disabled persons in the city. These are Census Tract 37147000701 (R/ECAP), 37147000701 (R/ECAP), and 37147000602 (southwest of R/ECAP). There is also some concentration of persons with a disability in the northeast areas by the Tar River and in the southeast areas from the R/ECAP tract toward Fire Tower Road.

HUD Map 15 – Disability by Age Group, All Ages (5 years and older)

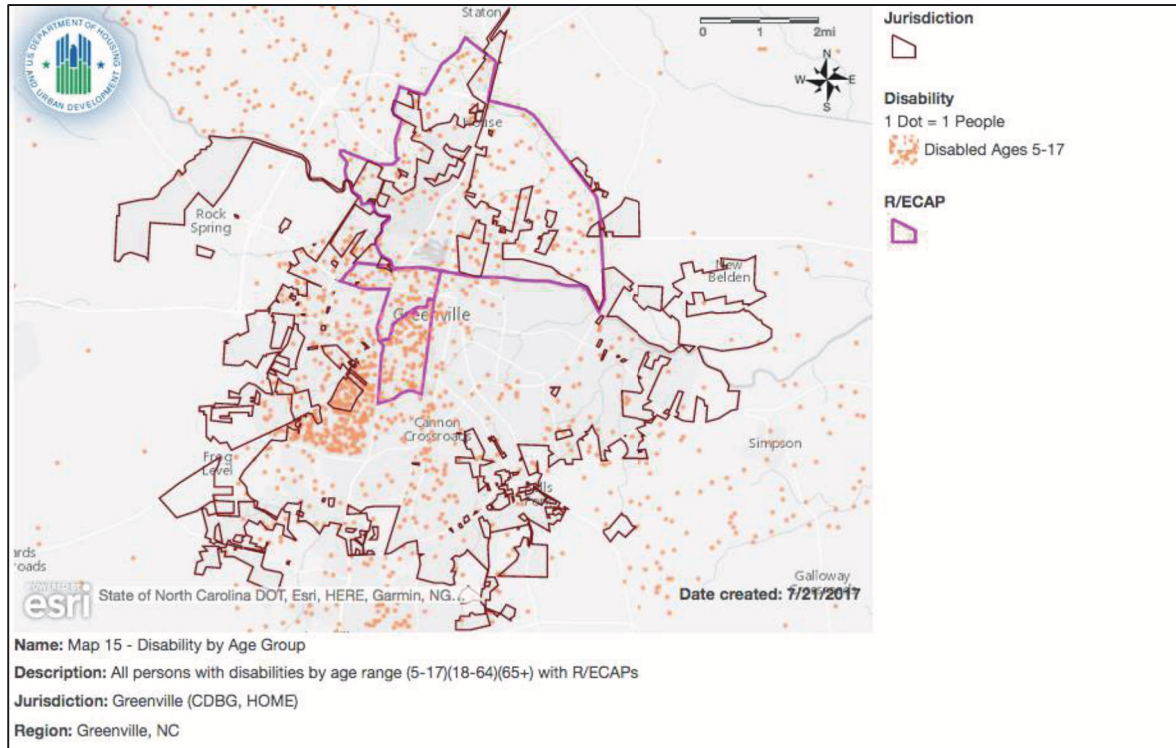


Source: HUD

Persons Age 5-17 with Disabilities

Persons 5-17 years old make up 13 percent of the disabled population in Greenville 5 years and older. According to HUD Map 15, Census Tract 37147000602 (southwest of R/ECAP) is by far the most heavily populated tract with young disabled persons. R/ECAP tracts 3714700701 & 3714700702 also show a larger number of young disabled persons than the rest of the city. (Source: HUD Table 14 – Disability by Age Group)

HUD Map 15 – Disability by Age Group, Ages 5-17 Years

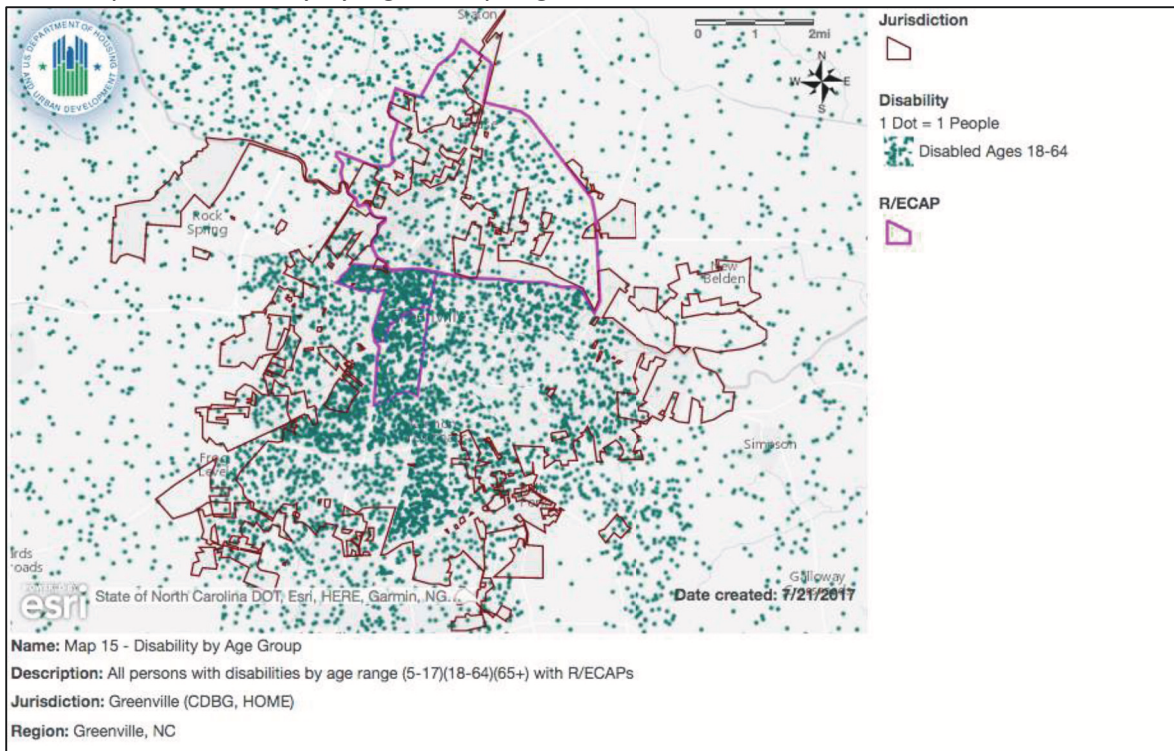


Source: HUD

Persons Age 18-64 with Disabilities

There are 4,701 disabled persons 18-64 years old in the city, which make up 55.3 percent of all the disabled population 5 years and older. The population with a disability in this age group is spread out more in the city than young persons and elderly with a disability, however, a large bulk of this age group is located in Census Tracts 37147000701 (R/ECAP) and 37147000702 (R/ECAP). Census Tracts 37147000602 (southwest of R/ECAP) and 37147000501 (from R/ECAP southeast to Fire Tower Road) also have concentrations of persons with disabilities in this age group. (Source: HUD Table 14 – Disability by Age Group)

HUD Map 15 – Disability by Age Group, Ages 5-17



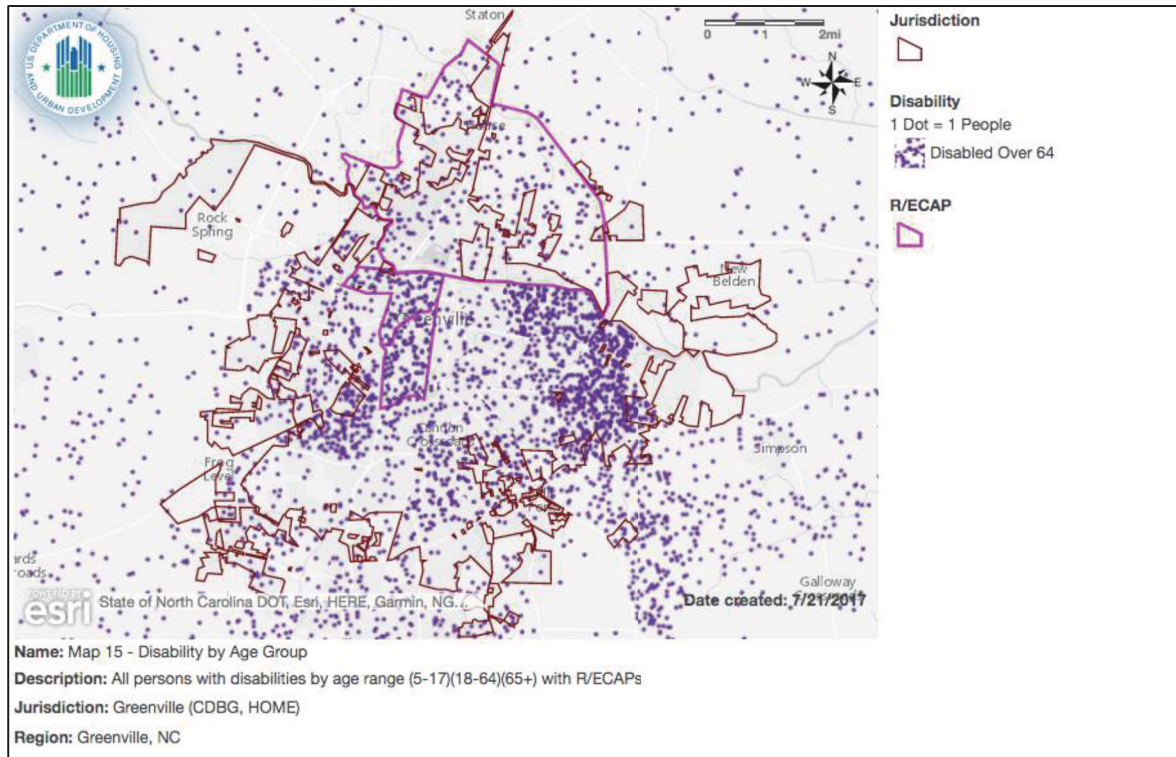
Source: HUD

Persons Age 65+ with Disabilities

According to HUD Table 14 – Disability by Age Group, 31.7 percent of the disabled population 5 years and older in the city are elderly (2,693 persons). Disabled elderly are located in some similar areas such as Census Tracts 37147000602 (southwest of R/ECAP) and 37147000702 (R/ECAP). A large number also are located in the northwest areas of the city (Census Tract 37147000201 north by Tar River and 37147000302 northeast of Greenville Boulevard).

As people age, otherwise able-bodied people develop disabilities that require adaptive arrangements to make it possible for them to live independently in the community. According to the 2011-2015 ACS, a third of the elderly ages 65-74 years in the city developed a disability (27.6 percent) and half of those older than 75 developed a disability (61.8 percent). Those estimates are well above all younger age cohorts.

HUD MAP 15 – Disability by Age Group, Age 64 or more years



Source: HUD

2. Housing Accessibility

a. Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.

There is a lack of decent affordable units across the board. From a purely quantitative standpoint, there are ample units in the city to house the population. The problem is that high home values and rents result in much of the housing stock being too costly for large portions of the population, especially the elderly and disabled. According to the 2011-2015 ACS, 28.2 percent of homeowners with a mortgage and 59.4 percent of renters are cost burdened (spending more than 30 percent of income on housing costs), pointing to a major disconnect between the housing supply and residents' income.

Table 10 - Demographics of Households with Severe Housing Cost Burden

Households with Severe Housing Cost Burden*	(Greenville, NC CDBG, HOME) Jurisdiction		
	# with severe cost burden	# households	% with severe cost burden
Race/Ethnicity			
White, Non-Hispanic	4,570	20,083	22.76%
Black, Non-Hispanic	3,229	11,941	27.04%
Hispanic	235	1,035	22.71%
Asian or Pacific Islander, Non-Hispanic	105	839	12.51%
Native American, Non-Hispanic	10	43	23.26%
Other, Non-Hispanic	155	552	28.08%
<i>Total</i>	<i>8,304</i>	<i>34,470</i>	<i>24.09%</i>
Household Type and Size			
Family households, <5 people	1,782	15,314	11.64%
Family households, 5+ people	228	1,473	15.48%
Non-family households	6,284	17,664	35.58%
Note 1: Severe housing cost burden is defined as greater than 50% of income. Note 2: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households. Note 3: The # households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems. Note 4: Data Sources: CHAS Note 5: Refer to the Data Documentation for details (www.hudexchange.info).			

As reported in HUD Table 10 – Demographics of Households with Severe Housing Cost Burden (housing costs greater than 50 percent of income), almost a quarter of every household in Greenville is severely cost burdened (24.1 percent). Blacks (27 percent) and other, n-Hispanic (28.1 percent) all had more severely cost burdened households than the citywide average. (Source: HUD AFH Table 10 – Demographics of Households with Severe Housing Cost Burden).

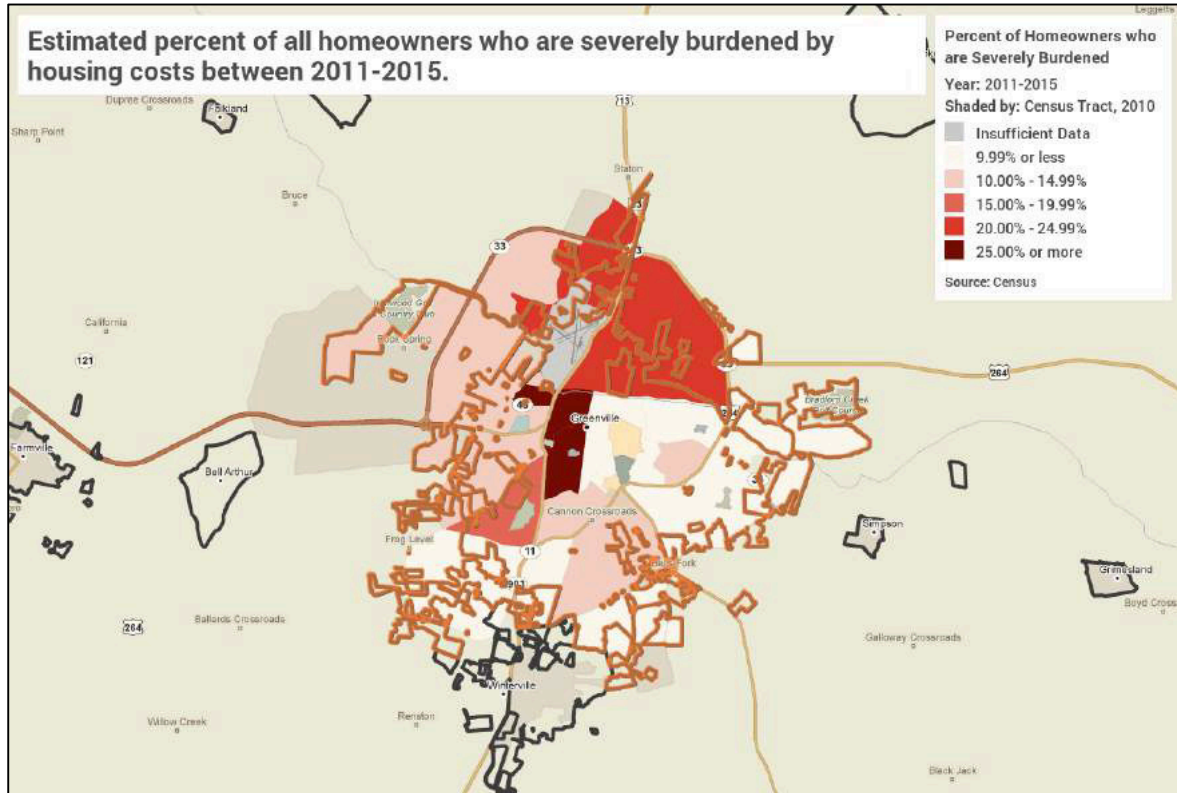
Location of Severely Cost Burdened Households

Severely Cost Burdened Homeowners

There are two areas where one in four or more households are severely cost burdened. The two tracts are Census Tract 37147000701 and Census Tract 37147000702, which are two of the R/ECAP tracts in the city. R/ECAP tract 37147000800 in the north and northeast area of the city also show a high percentage of homeowners who are severely cost burdened.

According to the 2011-2015 ACS via PolicyMap, R/ECAP tracts 37147000701 was 81.1 percent black and 37147000702 was 93.8 percent black. Both tracts had slightly more than 58 percent of people living in poverty.

MAP – Severely Cost Burdened Homeowners

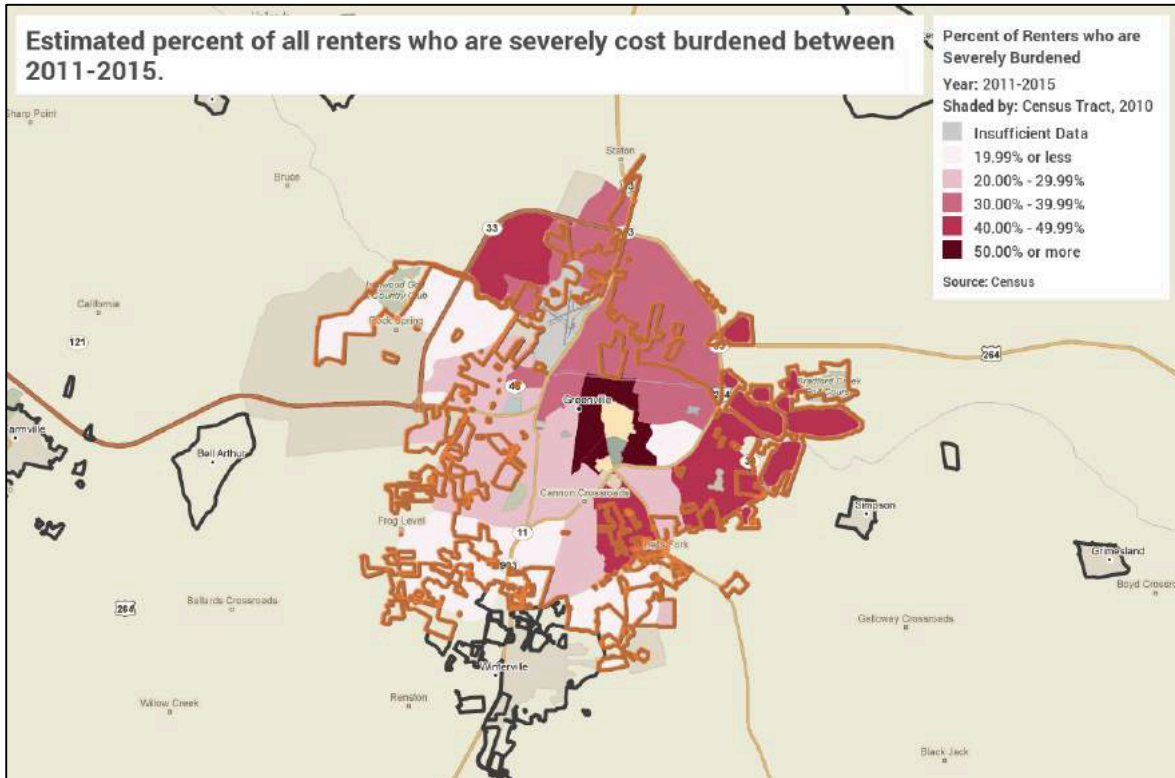


Source: 2011-2015 ACS via PolicyMap

Severely Cost Burdened Renters

Renters in Greenville are more severely cost burdened than homeowners on average and according to the map below, they are also more spread out around the city. There are two tracts (Census Tracts 37147000100 and 37147000400) around East Carolina University that have 50 percent or more renters who are severely cost burdened, however this data may be skewed by the high number of students living in the area.

MAP – Severely Cost Burdened Renters



Source: 2011-2015 ACS via PolicyMap

While many areas in the western part of Greenville have households with lower income and higher poverty rates, they are also in areas where media gross rent is lower than the rest of the city (Source: 2011-2015 ACS via PolicyMap).

Public Housing Access for Persons with Disability

The Housing Authority of the City of Greenville is the local public housing authority in the city. For disability access in public housing developments, the JHA is in compliance with all section 504 code and ADA regulations as required by a HUD-funded public housing authority projects. Currently, the housing authority has 714 public housing development

units available to residents, including eligible persons with a disability, and it also offers 746 housing choice vouchers, serving an additional 225 families through other federally funded programs. Staff may be contacted at (252) 329-4008 to inquire about programs and waiting lists.

The housing authority has an admissions preference for working families and those unable to work because of age or disability.

Public Housing Condition

The condition of public housing is also critical in determining availability of affordable housing for disabled residents who require assistance in the city. Although inspections may not occur every year, HUD releases physical inspection scores annually for public housing developments across the nation. Below is the inspection score for Greenville’s public housing developments.

Housing Authority of the City of Greenville, PH Development Physical Inspection Scores, 2016				
Site	Address	Units	Score	Inspection Date
Kearny Park	704 W 14 th Street	238	88	2/2/2015
Moyewood I	506 W Roundtree Drive	228	89	9/23/2015
Hopkins Park	209 W Moore Street	248	82	9/24/2015
Source: HUD				

The Housing Authority of the City of Greenville public housing development units are average performing, but not far from high performing. HUD Physical Inspection scores are deficiency based, meaning all developments start with 100 points, with each deficiency observed reducing the overall score. They are also weighted by inspection areas: site (15), building exterior (15), building systems (20), common areas (15), and most importantly dwelling units (35). In general, high performing developments will score greater than 90 and troubled developments will score below than 60. (See HUD 77 FR 47708 for detailed computation of physical inspection scores)

Multifamily assisted units in the city also receive physical inspection scores. As of 2016, 12 such sites were inspected, with eight rates as high performing and four as average. The following table displays multifamily sites and their inspection scores.

HUD Multifamily Physical Inspection Scores, 2016			
Site	Address	Score	Inspection Date
High Performing			
Ashton Place	985 Verdant Drive	99	1/8/2015
Spring Arbor of Greenville	2097 W Arlington Blvd	99	4/3/2015
The Pointe at Wimbledon II	1530 Wimbledon Drive	97	8/5/2013
Wedgewood Arms	121 Wedgewood Drive	97	9/12/2014
ARC/HDS Pitt County Group Home 2	1203 Red Banks Rd	95	10/30/2015
Carolina Cove Apartments	111 Lakeview Terrace	93	6/11/2014
Glendale Court Apartments	111 Glendale Ct	93	10/27/2015
Greentree Village Apartments	2915 Tammie Trail	91	7/16/2015
Average Performing			
Waterford Place Apartments I	2792 Stantonsburg Rd	89	11/13/2014
Waterford Place Apartments IV	2792 Stantonsburg Rd	85	10/22/2015
Signature Place	410 Beasley Drive	85	10/23/2015
University Towers	500 E Third St	82	11/21/2014
Source: HUD			

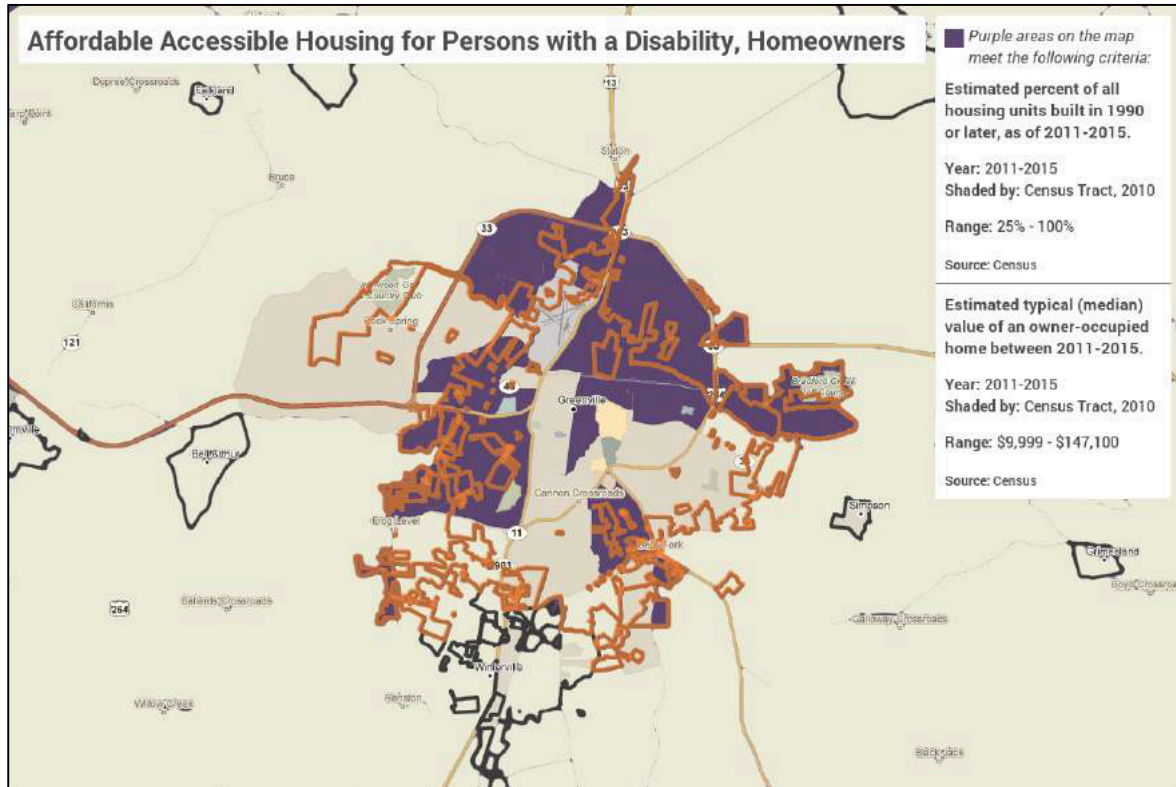
b. Describe the areas where affordable accessible housing units are located in the jurisdiction and region. Do they align with R/ECAPs or other areas that are segregated?

Housing for low-income persons with disabilities must be accessible, affordable and able to accommodate handicaps. Because the Fair Housing Act requires that most multifamily properties built after 1991 meet accessibility standards required by persons with a disability, it is generally accepted that multifamily housing built after this date meet the minimum level of accessibility if built in compliance with federal law. While not a perfect indicator of accessibility, an examination of the age of housing stock and its location can provide a picture of places where there is more or less accessibility.

To get a better picture of this, a combination of age of housing and affordability is used to determine accessibility. For age of housing, areas where 25 percent or more of housing was built after 1990 is deemed to be accessible. As of 2015, slightly more than 60 percent of the housing stock in the city was built after 1990, however this varied across Greenville.

For affordability, location of housing with value at the median home value or below (\$147,100) and rents at median gross rent and below (\$742) are considered to have accessible housing. The following two maps provide only areas that meet the criteria of housing built after 1990 and homeowner values of \$147,100 and below, and median gross rent of \$742 and below. (Source: 2011-2015 ACS)

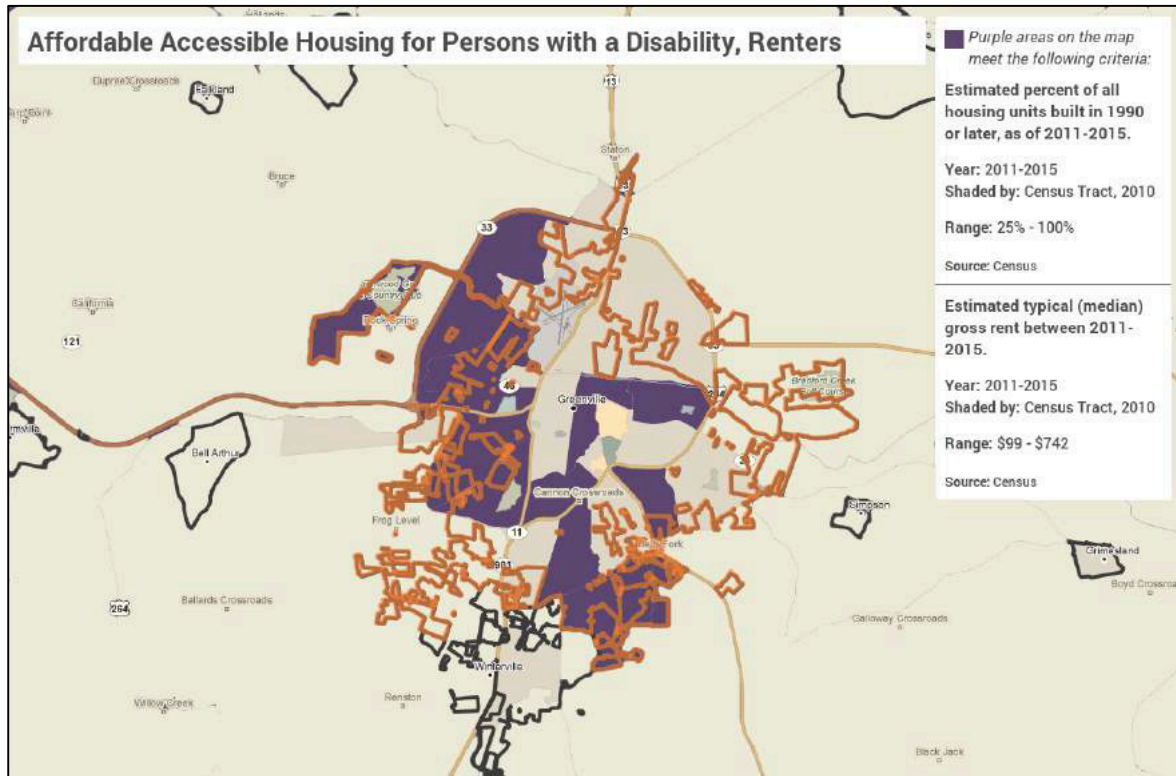
MAP – Affordable Accessible Housing for Persons with a Disability, Homeowners



Source: 2011-2015 ACS via PolicyMap

According to the map, the northern areas of Greenville are largely accessible for persons with a disability. Purple shades areas display both criteria of 25 percent or more of housing built after 1990 and homes with the city average median value of \$147,100 or below. While housing in the R/ECAP tract may be deemed affordable, there were fewer homes built after 1990.

MAP – Affordable Accessible Housing for Persons with a Disability, Renters



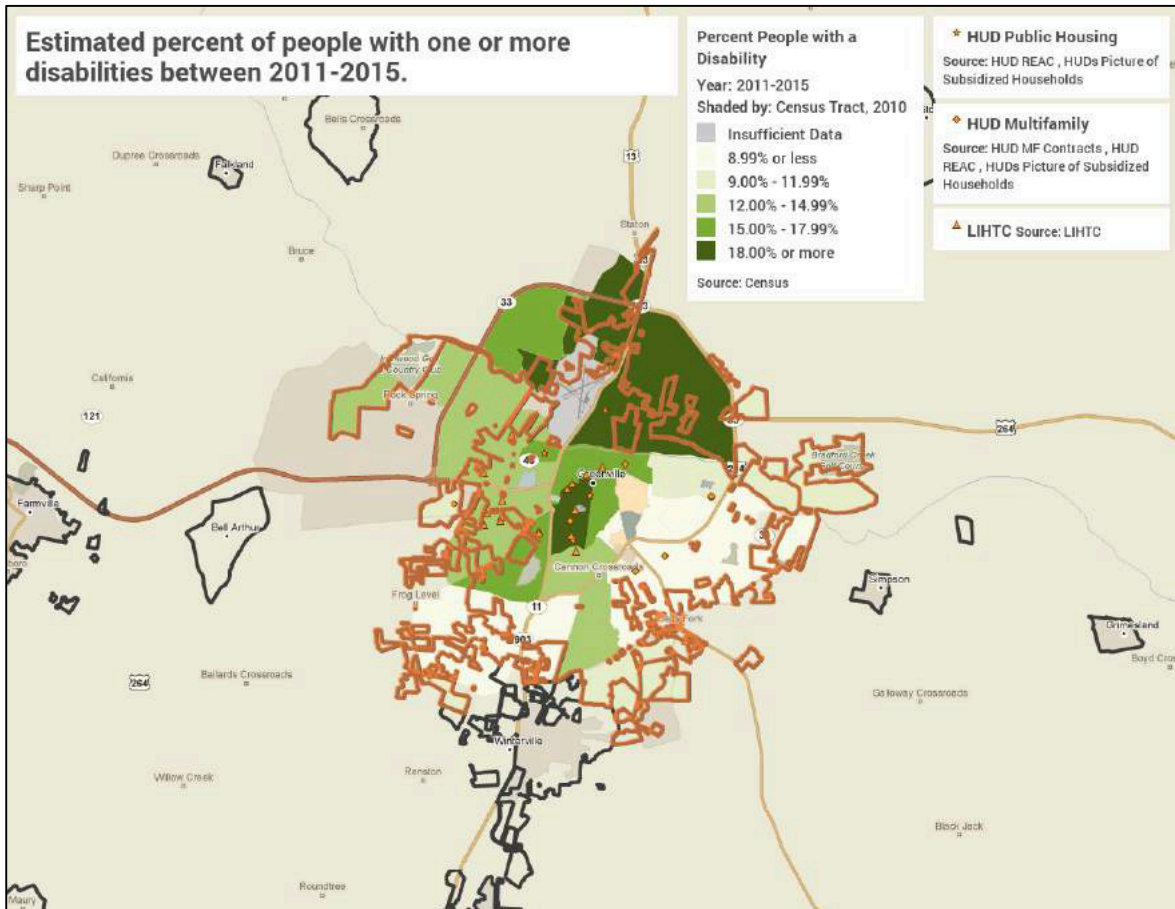
Source: 2011-2015 ACS via PolicyMap

Much of the western half of Greenville and the southeastern areas of the city have accessible housing for renters who are disabled. Purple shaded areas display both criteria of 25 percent or more of housing built after 1990 and homes with the city average median gross rent of \$742 or below. While housing in the R/ECAP tract may be deemed affordable, there were fewer homes built after 1990.

Accessible Publicly Supported Housing for Persons with a Disability

The majority of publicly supported housing is located in the northwest part of the Greenville, especially the housing authority's public housing developments, HCV program and LIHTC housing. While Section 8 housing was also present in the northwest area of Greenville, this housing type was more spread out across the city. The two other HUD multifamily housing units were on the east side of the city.

MAP: Persons with a Disability and Proximity to Public Housing



Source: 2011-2015 ACS, HUD and LIHTC via PolicyMap

c. To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing in the jurisdiction and region?

The Housing Authority of the City of Greenville (HACG) is a HUD recognized and funded public housing authority. All HUD-funded programs and projects are required to conform to the ADA regulations and be Section 504 compliant. It is the policy of the HACG to give preference to working families, elderly and persons who are disabled.

While the city and HACG promote and make reasonable accommodations for all persons with a disability, HACG has difficulty covering the needs of all people with disabilities. Project-based Section 8 housing and HCV housing vouchers, specifically in non-R/ECAP tracts, have the highest percentage of disabled residing in those units as compared to the other categories of publicly supported housing in Greenville. Project-based Section 8 residents in non-R/ECAP tracts are 24.1 percent – almost a quarter of all the residents in this housing category. In the HCV Program they are 21.6 percent – a little more than one in five. For the HCV Program, disabled persons holding housing vouchers have the option to find housing that accommodates their needs. (Source: HUD Table 7 – R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category)

3. Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings

a. To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?

In 1991, the U.S. Department of Justice defined “the most integrated setting appropriate to the needs of qualified individuals with disabilities” as “a setting that enables individuals with disabilities to interact with nondisabled persons to the fullest extent possible.”⁵ In 2011, they further reinforced this with a statement:

...those that provide individuals with disabilities opportunities to live, work, and receive services in the greater community, like individuals without disabilities. Integrated settings are located in mainstream society; offer access to community activities and opportunities at times, frequencies and with persons of an individual’s choosing; afford individuals choice in their daily life activities; and provide individuals with disabilities the opportunity to interact with non-disabled persons to the fullest extent possible.⁶

Two factors immediately influence the ability to integrate the settings of persons with a disability: where the individual lives and how the individual will travel to places. Deciding where to live for individuals with a disability is often a complicated process with several layers of considerations, which can lead to less affordability and accessibility. HUD MAP 15 – Disability by Age Group shows the highest number of disabled persons in Greenville live in Census Tracts 37147000701 (R/ECAP), 37147000702 (R/ECAP), and 37147000602 (SW of R/ECAP). All three of these tracts are located in the western half of the city. The two R/ECAP tracts 37147000701 and 37147000702, have an ample supply of restaurants up and down Route 13, parks in various locations and a variety of shops and stores especially along Dickinson Avenue and Route 13. Census Tract 37147000602 (SW of R/ECAP) has much less of in terms of restaurants, parks and shops and stores except for the southwest portion of the tract along Memorial Drive.

In 2015, Greenville had 8,703 total persons with a disability – 9.9 percent of the population. (Source: 2011-2015 ACS)

⁵ 56 Fed. Reg. 35694 (1992), codified at 28 C.F.R. pt. 35, app. B.

⁶ Statement of the Department of Justice on Enforcement of the Integration Mandate of Title II of the Americans with Disabilities Act and *Olmstead v. L.C.* (DOJ Olmstead Statement), http://www.ada.gov/olmstead/q&a_olmstead.htm. The Department of Justice is the agency charged with coordination of Section 504 and Title II of the ADA.

b. Describe the range of options for persons with disabilities to access affordable housing and supportive services in the jurisdiction and region.

Affordable Housing for Persons with a Disability

Eligible persons with a disability have access to publicly supported housing in Greenville through the Housing Authority of the City of Greenville (HACG). According to the HUD-provided data, there are 353 residents using public housing who have a disability.

As reported, there are 116 persons who reside in the public housing development managed by HACG. As a federally funded housing authority, HACG makes access to public housing, programs and activities available to all protected classes, including persons who are disabled.

The HCV Program in the city houses 147 persons with disabilities, which is approximately one-in-five program participants. This housing category serves the most disabled residents. Persons with a disability have the ability to seek housing throughout the city that can accommodate for their disabilities through the HCV Program, unlike other publicly supported housing that have permanent locations.

Project-based Section 8 has 89 disabled persons and other HUD multifamily sites reported one. (Data Source: HUD AFFH Table 15)

Table 15 - Disability by Publicly Supported Housing Program Category

(Greenville, NC CDBG, HOME) Jurisdiction	People with a Disability	
	#	%
Public Housing	116	16.89%
Project-Based Section 8	89	19.69%
Other Multifamily	1	2.27%
HCV Program	147	20.11%
(Greenville, NC) Region		
	#	%
Public Housing	116	16.89%
Project-Based Section 8	89	19.69%
Other Multifamily	1	2.27%
HCV Program	214	18.37%
Note 1: The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs.		
Note 2: Data Sources: ACS		
Note 3: Refer to the Data Documentation for details (www.hudexchange.info).		

Supportive Services for Persons with a Disability

A number of organizations and local agencies provide services for persons with disabilities. Below is a list of prominent agencies and organizations and a summary of the services they provide:

Disability Advocates & Resource Center is a center for independent living with a mission to empower people with a disability to become or remain independent in the community. This mission is accomplished through support for education, employment, and access to affordable housing, services and activities for disabled persons.

North Carolina Housing Coalition is a nonprofit member organization that works to provide decent and affordable housing for low- and moderate-income households throughout the state. Services through the coalition include referrals, technical assistance, advocacy and providing resources to the public, including serving as a clearinghouse for data, statistics, best practices and research.

North Carolina Department of Health and Human Services provides a comprehensive list of services, hotlines, fact sheets and advocacy throughout the state. The department also offers services for the blind, and helps assist those who are blind, deaf-blind and visually impaired to find or keep their job. Services for the deaf and hard-of-hearing are also available.

The North Carolina Office on Disability and Health works to promote health and wellness for persons with a disability in the state through an integrated program of policy, practice and evaluation. The office is a collaboration between the Division of Public Health of the Department of Health and Human Services and the Frank Porter Graham Child Development Institute at UNC at Chapel Hill. It developed the N.C. Plan to Promote the Health of People with Disabilities, which brings together the top experts and workers in the state to build the state's capacity to improve the health of people with a disability. The plan also identifies issues such as discrimination and issues a challenge to address these issues that people with disabilities face.

Pitt County Adult Services offers services to disabled persons or handicapped in respite, case management, in-home services and community alternative program.

Support Team for Adaptive Recreation (STAR), a nonprofit organization, provides support groups that promote independence through social and adapted recreation for persons with a disability. Members can join for the low cost of \$10 annually. Annual activities include an arts workshop, beach retreat, bowling event, water-based activity events, and adaptive

recreation and sports days. Social events are also planned such as pizza parties, special cooking demonstrations and a SuperBowl party.

4. Disparities in Access to Opportunity

a. To what extent are persons with disabilities able to access the following in the jurisdiction and region? Identify major barriers faced concerning:

i. Government services and facilities

The city of Greenville complies with American with Disabilities Act (ADA) policy and regularly gives notice that the city will not discriminate against qualified individuals with disabilities in the city's services, programs or activities. The city government does not discriminate on the basis of any class or characteristic protected by law. The ADA Compliance Notice for employment, effective communication and modifications to policies and procedures can be found at the following city-administered web address: www.greenvillenc.gov/live/ada-compliance-notice.

For employment, the city does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations by the U.S. Equal Employment Opportunity Commission under Title I of the ADA.

To allow persons with a disability to participate equally with the city's programs, services and activities, the city will generally, upon request, provide appropriate aid and services that lead to effective communication for persons with a disability. The city will also make all reasonable modifications to policies and programs to ensure that those with disabilities have an equal opportunity to enjoy all of its facilities, programs, services and activities. Anyone in need of aid or service for effective communication should contact the ADA coordinator no later than 48 hours before the scheduled event.

For more information on how disabled persons can access and participate in the city's programs, services and activities, the ADA coordinator can be contacted at (mailing) P.O. Box 7207, Greenville, North Carolina 27835-7207; (physical) 200 West Fifth St., Greenville, N.C. 27834; phone (252) 329-4452; fax (252) 329-4313; or email lmccarthy@greenvillenc.gov.

The city also provides a grievance procedure to meet the requirements of the ADA. Written complaints detailing the circumstance can be filed with the ADA coordinator. Information

in the complaint should include name, address, phone number of complainant and location, the date and description of the problem. A detailed description of the grievance procedure can be found at www.greenvillenc.gov/live/ada-compliance-notice.

ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)

According to the city's zoning and code of ordinances, sidewalks will be constructed in accordance with the city's Manual of Standard Designs and Details (MSDD), while remaining in compliance with the dimensional standards of the American with Disabilities Act. The MSDD can be found online and in download form on the city's website at <http://www.greenvillenc.gov/government/public-works/engineering/manual-of-standard-designs-and-details>

For parking a vehicle, qualified persons with a disability may use their handicapped placard to park their vehicle in a two-hour parking zone with no restriction to the time limits. To comply with this provision, the handicap placard must be displayed visibly. Handicapped parking places reserved for persons with a disability also have no time restrictions with a displayed handicap placard.

In 2016, the city adopted a community vision plan called the Horizons Plan 2026. As part of this plan, the city will actively promote a healthy lifestyle by allowing accessible sidewalks and lanes for physically disabled persons. These sidewalks and lanes will have access to community gardens, farmer's markets, grocery stores, housing, jobs and recreation.

iii. Transportation

Transportation services for persons with a disability in the city of Greenville is summarized below.

Bus and Paratransit Services

The Greenville Area Transit (GREAT) is owned by the city and is operated by the Transit Division of the Public Works Department. This transit service is available to all persons in the city, including those with disabilities. Routes are fixed and passengers can be picked up at designated stops throughout the city.

GREAT is ADA-compliant and also complies with North Carolina's accessibility requirements. Due to this, all GREAT buses in service have features to aid persons with a disability. These features include fold out wheelchair ramps, space for two wheelchairs, audio and visual announcements of major stops, reserved seating for qualified elderly and persons who are disabled, and kneeling vehicles for easier boarding. Service animals are allowed to ride free of charge. The driver must be notified before boarding, and the service animal may not occupy a seat or obstruct aisles or exits.

For those with a disability that prevents them from being able to access GREAT buses, paratransit service are available. The service is offered through the Pitt Area Transit System (PATS). PATS is a curb-to-curb service that runs during the same service hours as GREAT buses.

Any comments, concerns, inquiries or complaints about GREAT buses and accessible services can be directed to the department at (252) 329-4532.

Train Service

Passenger train service in and out of the city is available through Amtrak. The stop is available at Second and Reade streets a few blocks north of East Carolina University. Persons with a disability seeking accessible seating, space for wheelchairs and accommodations are available, but reservations are encouraged to ensure availability. Reservations can be made online by calling (800) USA-RAIL or TTY (800) 523-6590 and at any staffed station during regular ticket office hours. Currently, the Greenville stop is a parking- and curb-only location (no office or staffing), and there are no lifts or accessible high platforms, making this stop non-wheelchair accessible. Also, there are no shelters or water sources on these routes.

Airport Services

Pitt-Greenville Airport offers commercial flight services from American Airlines. The airport is located just 2 miles north of East Carolina University and 3 miles from Vidant Medical Center. The airport is accessible from Interstate 40 and 95. American Airlines offers special assistance through its disability team. Special assistance can be requested for wheelchair service and for assistance for those with hearing, vision or cognitive or developmental disability. To contact American's disability team for more information call (800) 892-3524 and for special assistance booking (800) 433-7300. Special assistance can

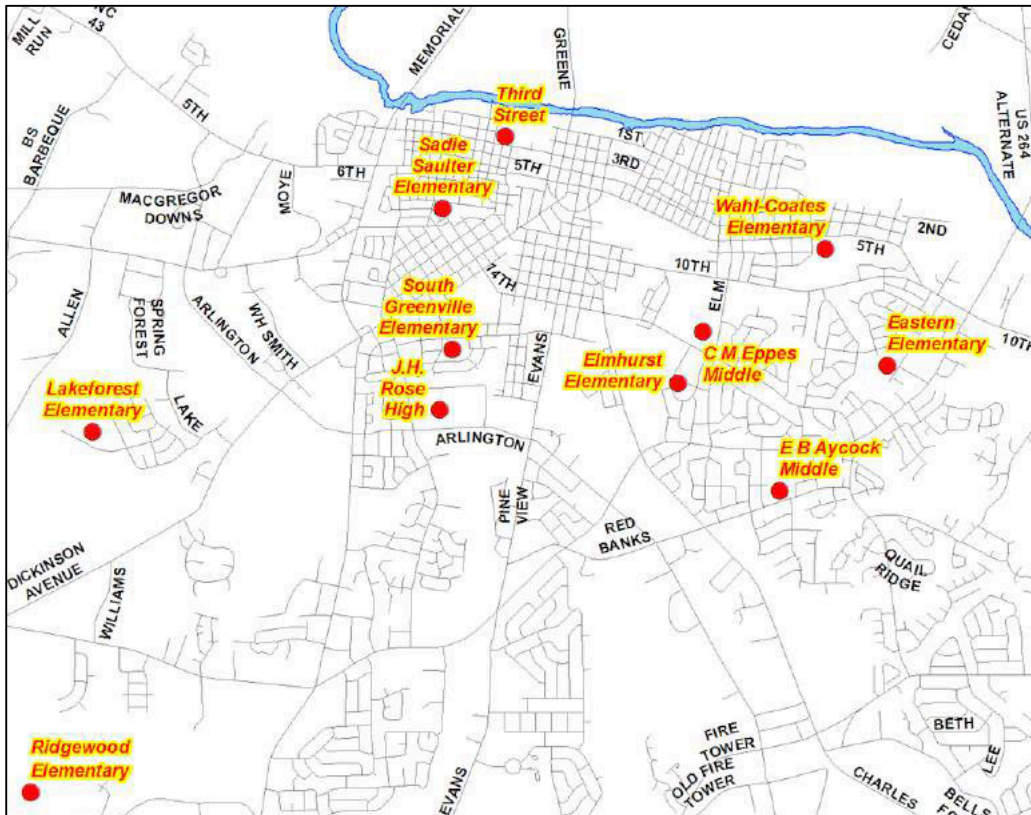
also be requested online at <https://www.aa.com/i18n/customer-service/contact-american/special-assistance.jsp>

iv. Proficient schools and educational programs

Public schools in the city of Greenville, managed by Pitt County Schools, are compliant with the American with Disabilities Act. The school district administers all education programs, employment activities and admissions without discrimination against any person on the basis of gender, race, color, national origin, religion, age or disability.

The Exceptional Children’s Department of Pitt County Schools works to assure that students with disabilities develop mentally, physically, emotionally and vocationally through appropriate individualized education in the least restrictive environment. The services encompass education programming for autism, adapted physical education, assistive technology, adapted curriculum such as music therapy, occupational course study to learn vocational skills, and pre-kindergarten services.

MAP: Public Schools K-12 in Greenville



v. **Jobs**

Of the 7,716 persons of working age (16 years and older) who were disabled in Greenville, 17.5 percent (1,347) were employed.

When comparing the percentages of disabled persons employed in a certain industries as compared to non-disabled persons in the city, a higher percentage with disabilities were employed in manufacturing, wholesale, finance and insurance, and real estate, rental and leasing. There were fewer disabled persons working in educational services, health care, social assistance, arts, entertainment, recreation, accommodation and food services.

In a comparison of occupations, persons who have a disability were more likely to be in sales and office occupations and production, transportation and material moving occupations. They are less likely to be in management, business, science and arts occupations. (Source: 2010-2014 ACS, S1811)

Employment Rights for Persons with a Disability

Persons with a disability in the city are protected through the U.S. Equal Employment Opportunity Commission (EEOC), which enforces the American with Disabilities Act of 1990 and Sections 501 and 505 of the Rehabilitation Act of 1973. EEOC is responsible for enforcing federal laws that make discrimination against hiring an applicant or an employee illegal on the basis of one's race, color, national origin, sex, religion, age or disability. The laws apply to all types of work situations including hiring, promotions, harassment, training, wages, benefits and firing. EEOC has the authority to investigate charges of discrimination against employers who are covered by the law. Charges of discrimination in hiring or in the workplace can be brought to the EEOC online at <https://www.eeoc.gov/contact/index.cfm> or by phone at (800) 669-4000 or TTY (800) 669-6820.

For applicants interested in working for the city and current city employees, the city of Greenville does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations in accordance with the American with Disabilities Act. Qualified persons with a disability may contact the coordinator at (mailing) P.O. Box 7207, Greenville, North Carolina 27835-7207; (physical) 200 West Fifth St., Greenville, N.C. 27834; phone (252) 329-4452; fax (252) 329-4313; or email lmccarthy@greenvillenc.gov.

b. Describe the processes that exist in the jurisdiction and region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.

In accordance with the American with Disabilities Act of 1990, the city of Greenville will not discriminate against qualified persons with a disability on the basis of any disability in its services, programs, activities and employment. For anyone with a disability who wishes to participate in city services, programs and activities, or for hiring and employment accommodations, there is a procedure to obtain access. In the event that any person with a disability feels the need to file a complaint alleging discrimination on the basis of disabilities in the provision of services, programs, activities and employment related issues, a grievance procedure is also available. Below are the procedures to request accommodations or to file a complaint.

Services, Programs and Activities Procedure

Any person who requires aid or accommodations to participate in services, programs, activities operated by the city should contact the Americans with Disabilities Act (ADA) coordinator as soon as possible, but no later than 48 hours before the scheduled event. The coordinator can be contacted through any of the following channels:

Mail: P.O. Box 7207, Greenville, North Carolina 27835-7207

Physical Location: 200 West Fifth St., Greenville, N.C. 27834

Phone: (252) 329-4452

Fax: (252) 329-4313

Email: lmccarthy@greenvillenc.gov

Employment Procedure

The city provides reasonable accommodation for interested applicants and current employees with a disability. During the application process, persons with a disability should contact the City of Greenville's Human Resources Department. Employees with a disability should contact the department for any accommodation they may require. The city's personnel policy governs employment-related complaints for discrimination on the basis of disability. The human resources department can be reached at City Hall, 200 West Fifth St., Greenville, N.C. 27858; (Phone) (252) 329-4492.

Grievance Procedure

The city of Greenville has established a detailed grievance procedure for persons with a disability who wish to file a complaint alleging discrimination on the basis of a disability in any of the city's services, programs and/or activities. The complaint should be in writing and contain a detailed description of the alleged discrimination, along with the complainant's name, phone number, location and date of the incident. Complaints may also be filed through personal interviews or a tape recording if requested by persons with a disability. The complaint can be submitted no later than 60 days after the alleged violation to the coordinator by mail at P.O. Box 7207, Greenville, NC 27835-7207.

After the submission of the complaint, the grievance procedure will follow through in this order:

1. Within 15 days of the receipt of the complaint, the ADA coordinator or its designee will meet with the complainant to discuss the complaint and possible resolution.
2. Within 15 days of the meeting, the ADA coordinator or its designee will respond in writing to the complainant (or in an appropriate accessible format to complainant) detailing the position of the city and offer options for substantive resolution of the complaint.
3. If the response is not satisfactory, the complainant may appeal the decision within 15 days after the receipt of the response. The appeal will be brought to the city manager.
4. Within 15 days of the receipt of the appeal, the city manager will meet with the complainant to discuss the complaint and possible resolutions.
5. Within 15 days of the meeting with the city manager, the city manager will respond in writing to the complainant (or in an appropriate accessible format to complainant) with a final resolution.

c. Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities in the jurisdiction and region.

Persons with a disability in Greenville face the added difficulty of purchasing homes that must often be brought up to applicable state and local or Americans with Disabilities Act codes, which adds to the cost of purchasing or owning a home. According to the 2011-2015 ACS, for working individuals, persons with a disability earn 17.5 percent less than a person without a disability (\$15,856 median income versus \$19,215). Approximately 28.2 percent of homeowners with a mortgage in the Greenville are already cost burdened, and cost burden generally increases as median income decreases. Due to the reasons of finding homes that can accommodate for persons with disabilities and the general lack of affordability, persons with a disability have more limited options for homeownership in the City than non-disabled persons. (Source: 2011-2015 ACS 5-Year Estimates DP04, S1811)

As for difficulty achieving homeownership by disability type in Greenville, there are 2,854 persons with an independent living difficulty, 1,940 with self-care difficulty and 4,460 persons with ambulatory difficulty. There are 1,751 with hearing difficulty, 1,719 with vision difficulty and 3,684 with cognitive difficulty. While these numbers overlap because an individual may have one or more difficulty, and not all persons with a disability may be seeking homeownership, it gives us a picture of the number of homes that may require accommodations in Greenville. (Source: HUD AFH Data Table 13 – Disability by Type)

5. Disproportionate Housing Needs

a. Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities in the jurisdiction and region.

The city of Greenville recognizes the importance of responding to the critical needs of disabled individuals to promote self-sufficiency and independent living opportunities. To examine this issue, an estimate of the number of persons by disability type is an important indicator in determining housing needs. HUD is provided data of disability type in Greenville by the ACS, which defines disability based on questions asked to determine if persons are one or more of these categories:

Hearing Disability: Is this person deaf or does he/she have serious difficulty hearing ?

Visual Disability: Is this person blind or does he/she have serious difficulty seeing even when wearing glasses?

Cognitive Disability: Because of a physical, mental or emotional condition, does this person have serious difficulty concentrating, remembering or making decisions?

Ambulatory Disability: Does this person have serious difficulty walking or climbing stairs?

Self-care Disability: Does this person have difficulty dressing or bathing?

Independent Living Disability: Because of a physical, mental or emotional condition, does this person have difficulty doing errands alone such as visiting a doctor’s office or shopping?

The table below displays the number of persons in the city by disability type.

Table 13 - Disability by Type

Disability Type	(Greenville, NC CDBG, HOME) Jurisdiction	
	#	%
Hearing difficulty	1,751	2.17%
Vision difficulty	1,719	2.13%
Cognitive difficulty	3,684	4.57%
Ambulatory difficulty	4,460	5.53%
Self-care difficulty	1,940	2.41%
Independent living difficulty	2,854	3.54%
Note 1: All % represent a share of the total population within the jurisdiction or region. Note 2: Data Sources: ACS Note 3: Refer to the Data documentation for details (www.hudexchange.info)		

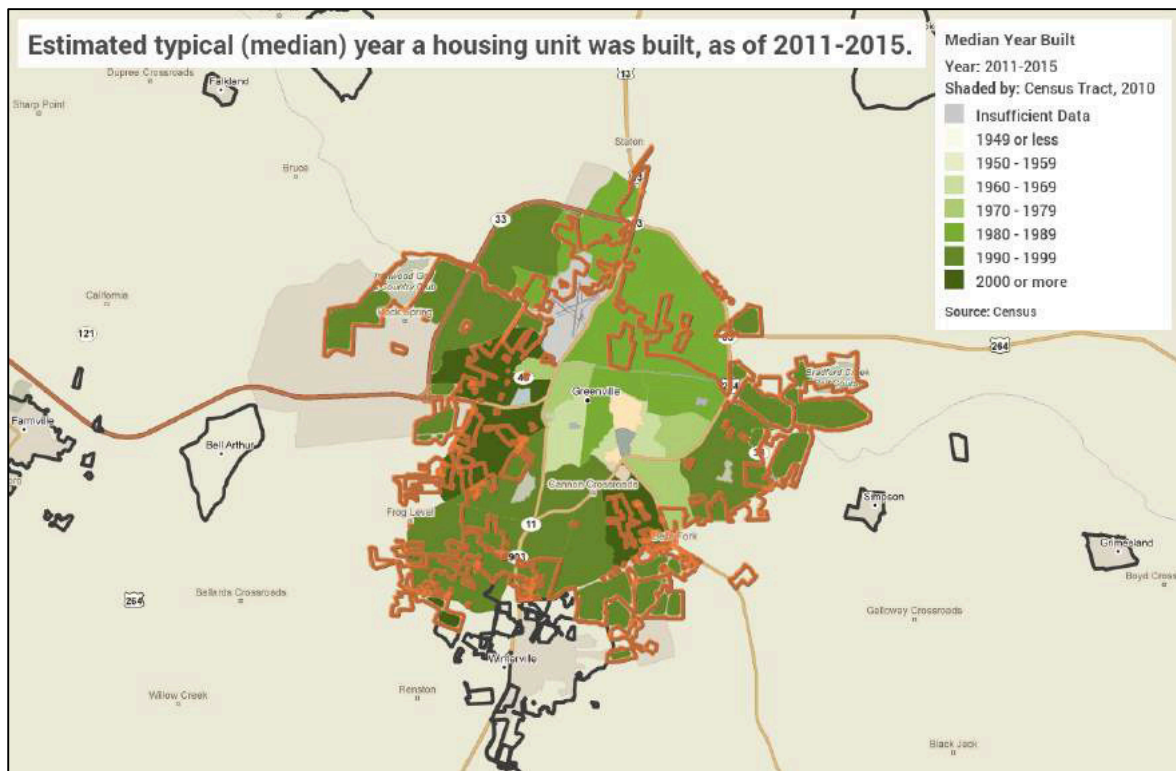
According to HUD AFH Data Table 13 – Disability by Type, disabled persons with an ambulatory difficulty are highest with 5.5 percent, followed by disabled persons with a cognitive difficulty with 4.6 percent and 3.5 percent with independent living difficulty.

Those with self-care difficulty represent 2.4 percent of the population and those with vision difficulties 2.1 percent.

As mentioned in the section before, affordability remains one of the most important issues persons with a disability face in achieving homeownership in Greenville. For working individuals, persons with a disability make 17.5 percent less than a person without a disability. More than one-in-four (28.2 percent) of homeowners with a mortgage in the city are already cost burdened, and cost burden generally increases as median income decreases. (Source: 2011-2015 ACS 5-Year Estimates DP04, S1811)

The age of housing can also disproportionately affect the housing needs of persons with a disability in the city. As the age of the house increases, it is more likely to require updates to bring the home up to date with current code, which adds to the cost of housing.

MAP: Median Year a Housing Unit was Built

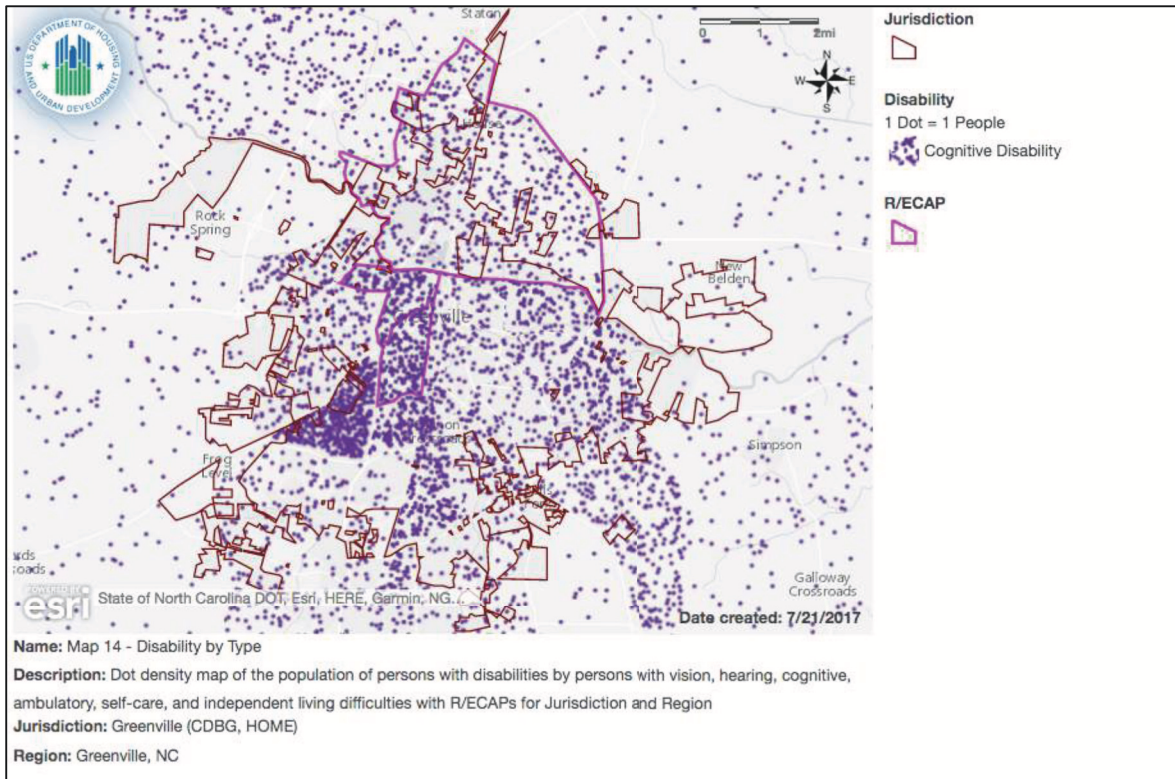


Source: 2011-2015 ACS via PolicyMap

In the map above, central areas of the city, including the R/ECAP tract, have the oldest homes in the city. Some of these areas have a median year built of 1979 and older. While this may indicate that there is low access to housing for persons with a disability due to the age of the structure, there are large groups by certain types of disabilities residing in these

areas. According to HUD MAP 14 – Disability by Type, two tracts show where there is a concentration of persons with ambulatory, self-care, independent living and cognitive disability also residing in tracts where the median year built for a home was 1979 or before. These tracts were the R/ECAP tracts 37147000701 and 37147000702.

HUD MAP 14 – Disability by Type, Cognitive



Source: HUD

While the tract SW of the R/ECAP (37147000602) displays the highest concentration of persons with a cognitive disability in the city, the tract generally has newer homes than the neighboring R/ECAP tracts. Other areas with a high number of individuals with this disability are also located in tracts where housing was built more recently.

6. Additional Information

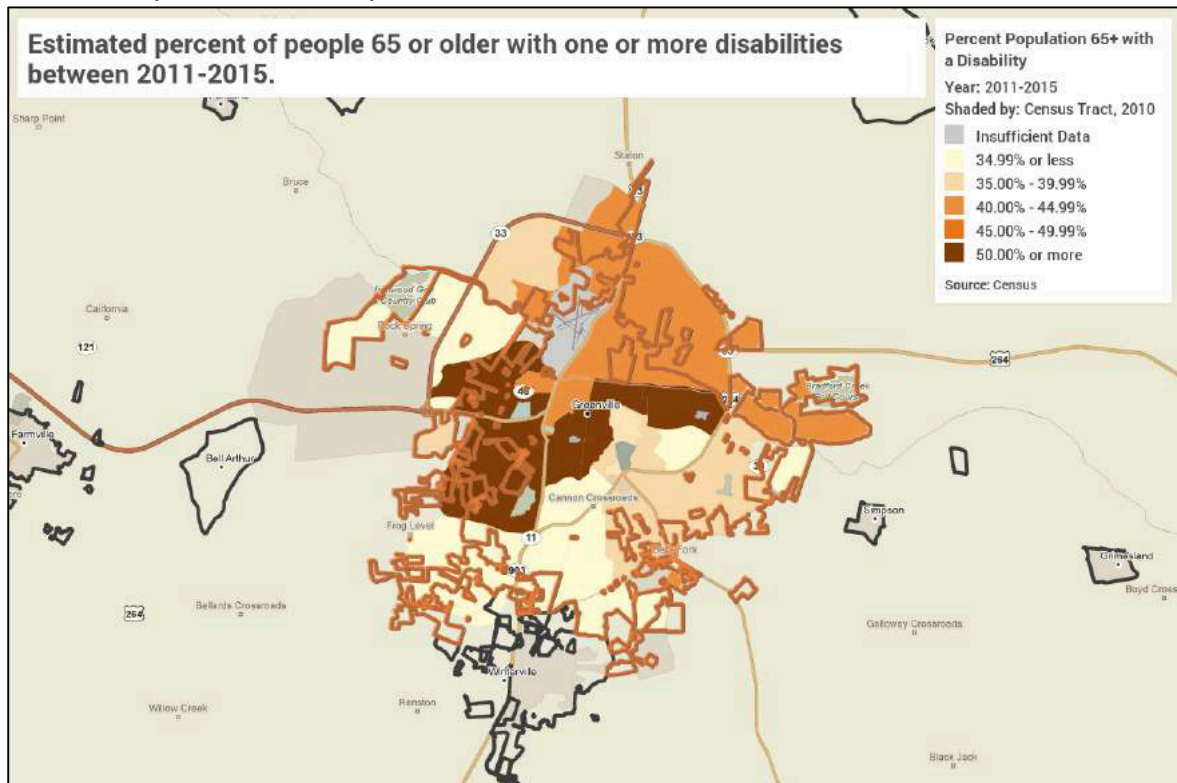
a. Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region including those affecting persons with disabilities with other protected characteristics.

Disabled persons in Greenville experience a lack of access to affordable and/or accessible housing that has been modified to meet their needs. When disabled persons are also elderly it brings forth a convergence of issues that must be addressed for them to continue to live independently or with family in the community.

Elderly and Disability Access

Elderly persons 65 years and older experience a disability rate much higher than the general population city-wide rate of disabled persons (9.9 percent). Approximately 27.6 percent of elderly 65 to 74 years old were with a disability and elderly 75 years and older experienced 61.8 percent with a disability – both much higher than the citywide rate. (2011-2015 ACS - S1810)

MAP: Elderly with a Disability



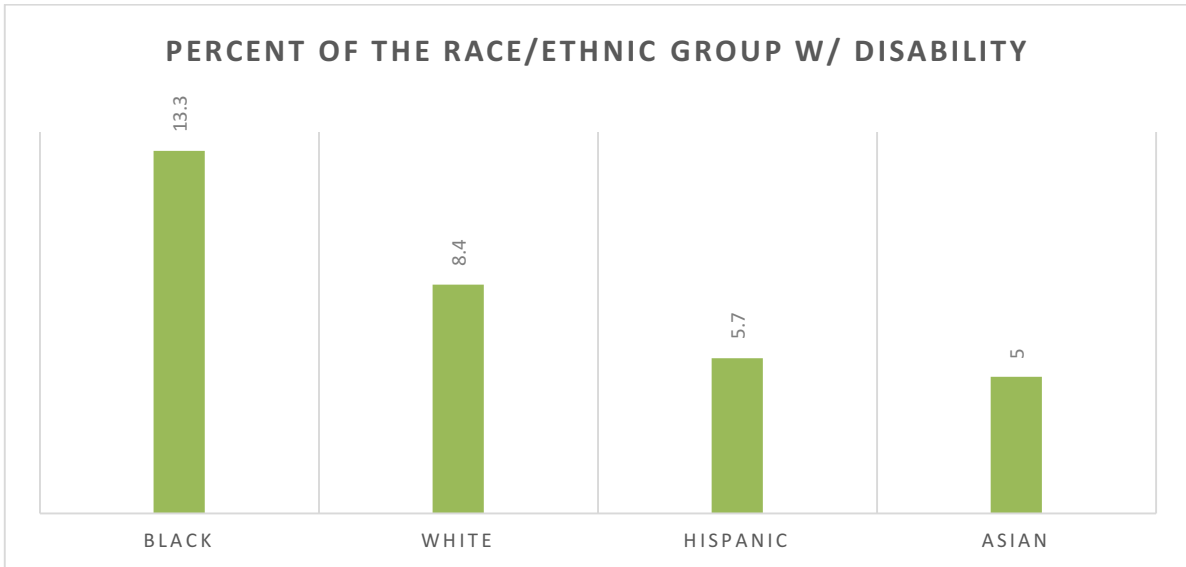
Source: 2011-2015 ACS via PolicyMap

Elderly 65 years and older with a disability are found in higher concentrations in north central areas of the city. Tracts with a concentration of 50 percent or more elderly with a disability are listed below:

- 37147000702: R/ECAP tract
- 37147000602: SW neighboring tract of the R/ECAP
- 37147000601: West of R/ECAP
- 37147000100: East of R/ECAP
- 37147000201: NE tract along Tar River

Race and Ethnicity and Disability Access

The disability rate for the city as a whole was 9.9 percent. All race and ethnic groups except for blacks have a disability rate lower than the citywide rate. Approximately 13.3 percent of blacks have a disability. Asians had a disability rate of 5 percent, and ethnic Hispanics with 5.7 percent. (2011-2015 ACS – S1810)

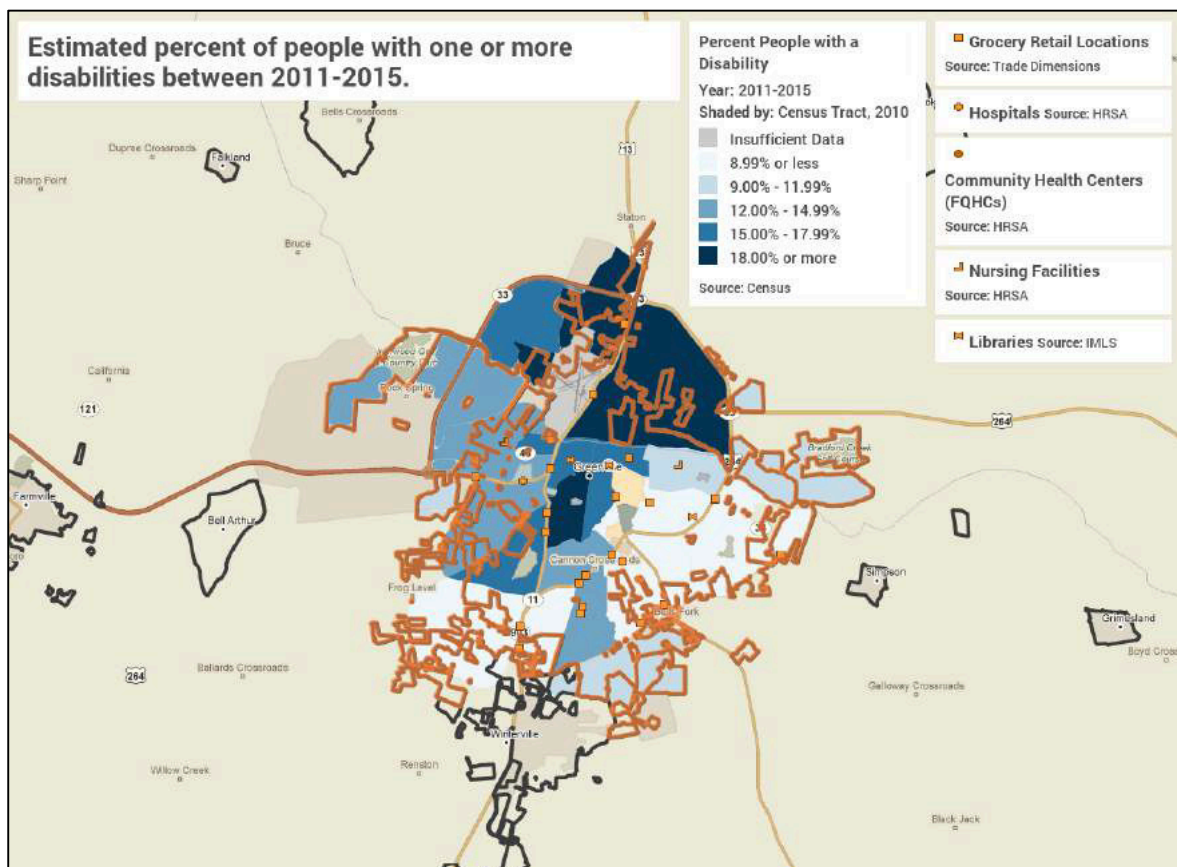


Source: 2011-2015 ACS (S1810)

b. The program participant may also describe other information relevant to its assessment of disability and access issues.

Planning that takes into consideration the needs of the population with disabilities is informed by an assessment of where high percentages of disabled persons reside in the city and how proximal these locations are to recreation, healthcare and grocery retail locations. The majority of these locations are found right along the major roadways in the city, however, there is no pattern of these locations targeting areas where a concentration of disabled people live.

MAP: People with Disabilities and Access



Source: 2011-2015 ACS vis PolicyMap

7. Disability and Access Issues Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disability and access issues and the fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor, note which fair housing issue(s) the selected contributing factor relates to.

- Access for persons with disabilities to proficient schools
- Access to publicly supported housing for persons with disabilities
- Access to transportation for persons with disabilities
- Inaccessible government facilities or services
- Inaccessible public or private infrastructure
- Lack of access to opportunity due to high housing costs
- Lack of affordable in-home or community-based supportive services
- Lack of affordable, accessible housing in range of unit sizes
- Lack of affordable, integrated housing for individuals who need supportive services
- Lack of assistance for housing accessibility modifications
- Lack of assistance for transitioning from institutional settings to integrated housing
- Lack of local or regional cooperation
- Land use and zoning laws
- Lending discrimination
- Location of accessible housing
- Loss of Affordable Housing
- Occupancy codes and restrictions
- Regulatory barriers to providing housing and supportive services for persons with disabilities
- Source of income discrimination
- State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing, shared housing and other integrated settings
- Other

There is a ***Lack of affordable, integrated housing for individuals who need supportive services*** for persons with a disability in the city of Greenville. While concrete numbers are difficult to equate, only 17.5 percent of persons who were disabled over the age of 16 were employed, and when they were employed they still earned less than non-disabled workers making affordable housing out of reach for many people with disabilities.

Also related is the ***Loss of Affordable Housing*** in the city. As employed persons with a disability earn less than nondisabled persons, it becomes increasingly difficult for them to find decent and safe housing when housing is becoming less and less affordable in Greenville. In 2000, 20 percent of homeowners were cost burdened, however in 2015 that number grew to 28.2 percent – an increase of more than 40 percent. For renters, in 2000, 45.3 percent were cost burdened and that number rose to 59.4 percent – an increase of more than 30 percent.

There is a ***Lack of assistance for housing accessibility modifications*** for disabled residents living in the city. While there are resources available for persons with a disability in Greenville, the strength of those resources falls short of the demand. The city has made it a high priority to preserve and increase affordable housing that is accessible for persons with disabilities in its latest consolidated plan.

There is also a lack of ***Access to publicly supported housing for persons with disabilities***. Persons with a disability face long wait times to have access into publicly supported housing in the city. While the Housing Authority of the City of Greenville takes disabled families as preference in its application selection, wait times can take several years. For example, recently opened Section 8 housing University Towers with 60 units has a current wait time of 24 to 30 months.

Housing that is both affordable and accessible for persons with a disability is difficult to find in the city. Census tracts in the city that are more affordable are located in the northwest tracts, nearby the R/ECAP tract. These tracts, however, show housing with a median year built of 1979 and older as well. Other areas with newer housing are also where home values and rents are higher making them less affordable. This in turn makes the ***Location of accessible housing*** a contributing factor in disability and access issues.

E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

1. List and summarize any of the following that have not been resolved:

- A charge or letter of finding from HUD concerning a violation of a civil rights-related law;
- A cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law;
- Any voluntary compliance agreements, conciliation agreements, or settlement agreements entered into with HUD or the Department of Justice;
- A letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law;
- A claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing; or
- A pending administrative complaints or lawsuits against the locality alleging fair housing violations or discrimination.

2. Describe any state or local fair housing laws. What characteristics are protected under each law?

The state of North Carolina has a statute, including a provision prohibiting discrimination in land-use or permitting decisions based on a development containing “affordable housing units for families or individuals with incomes below eighty percent (80%) of area median income.” Such a protection is unique in the nation among state fair housing laws. The law exempts decisions based on limiting “high concentrations of affordable housing.” To date no party has enforced the provision in court, but based on anecdotal accounts it has been used by developers to secure rezoning and other approvals.

Under the North Carolina Fair Housing Act of 1983:⁷

(a) It is an unlawful discriminatory housing practice for any person in a real estate transaction, because of race, color, religion, sex, national origin, handicapping condition, or familial status to:

⁷ Source: North Carolina State Fair Housing Act, Chapter 41A, 1983

- (1) Refuse to engage in a real estate transaction;
 - (2) Discriminate against a person in the terms, conditions, or privileges of a real estate transaction or in the furnishing of facilities or services in connection therewith;
 - (2a) – (2c) Repealed by Session Laws [2009-388](#), s. 1, effective October 1, 2009. (3) Refuse to receive or fail to transmit a bona fide offer to engage in a real estate transaction;
 - (4) Refuse to negotiate for a real estate transaction;
 - (5) Represent to a person that real property is not available for inspection, sale, rental, or lease when in fact it is so available, or fail to bring a property listing to his attention, or refuse to permit him to inspect real property;
 - (6) Make, print, circulate, post, or mail or cause to be so published a statement, advertisement, or sign, or use a form or application for a real estate transaction, or make a record or inquiry in connection with a prospective real estate transaction, which indicates directly or indirectly, an intent to make a limitation, specification, or discrimination with respect thereto;
 - (7) Offer, solicit, accept, use, or retain a listing of real property with the understanding that any person may be discriminated against in a real estate transaction or in the furnishing of facilities or services in connection therewith; or
 - (8) Otherwise make unavailable or deny housing.
- (b1) It is an unlawful discriminatory housing practice for any person or other entity whose business includes engaging in residential real estate related transactions to discriminate against any person in making available such a transaction, or in the terms and conditions of such a transaction, because of race, color, religion, sex, national origin, handicapping condition, or familial status. As used in this subsection, "residential real estate related transaction" means:
- (1) The making or purchasing of loans or providing financial assistance (i) for purchasing, constructing, improving, repairing, or maintaining a dwelling, or (ii) where the security is residential real estate; or
 - (2) The selling, brokering, or appraising of residential real estate.
- The provisions of this subsection shall not prohibit any financial institution from using a loan application which inquiries into a person's financial and dependent obligations or from

basing

- its actions on the income or financial abilities of any person.

(c) It is an unlawful discriminatory housing practice for a person to induce or attempt to induce another to enter into a real estate transaction from which such person may profit:

(1) By representing that a change has occurred, or may or will occur in the composition of the residents of the block, neighborhood, or area in which the real property is located with respect to race, color, religion, sex, national origin, handicapping condition, or familial status of the owners or occupants; or

(2) By representing that a change has resulted, or may or will result in the lowering of property values, an increase in criminal or antisocial behavior, or a decline in the quality of schools in the block, neighborhood, or area in which the real property is located.

(d) It is an unlawful discriminatory housing practice to deny any person who is otherwise qualified by State law access to or membership or participation in any real estate brokers' organization, multiple listing service, or other service, organization, or facility relating to the business of engaging in real estate transactions, or to discriminate in the terms or conditions of such access, membership, or participation because of race, color, religion, sex, national origin, handicapping condition, or familial status.

(e) It is an unlawful discriminatory housing practice to coerce, intimidate, threaten, or interfere with any person in the exercise or enjoyment of, on account of having exercised or enjoyed, or on account of having aided or encouraged any other person in the exercise or enjoyment of any right granted or protected by this Chapter.

(f) It is an unlawful discriminatory housing practice to:

(1) Refuse to permit, at the expense of a handicapped person, reasonable modifications of existing premises occupied or to be occupied by the person if the modifications are necessary to the handicapped person's full enjoyment of the premises; except that, in the case of a rental unit, the landlord may, where it is reasonable to do so, condition permission for modifications on agreement by the renter to restore the interior of the premises to the condition that existed before the modifications, reasonable wear and tear excepted.

(2) Refuse to make reasonable accommodations in rules, policies, practices, or services, when these accommodations may be necessary to a handicapped person's equal use and enjoyment of a dwelling.

(3) Fail to design and construct covered multifamily dwellings available for first occupancy after March 13, 1991, so that:

a. The dwellings have at least one building entrance on an accessible route, unless it is impractical to do so because of terrain or unusual site characteristics; or b. With respect to dwellings with a building entrance on an accessible route: 1. The public and common use portions are readily accessible to and usable by handicapped persons;

2. There is an accessible route into and through all dwellings and units; 3. All doors designed to allow passage into, within, and through these dwellings and individual units are wide enough for wheelchairs; 4. Light switches, electrical switches, electrical outlets, thermostats, and other environmental controls are in accessible locations; 5. Bathroom walls are reinforced to allow later installation of grab bars; and 6. Kitchens and bathrooms have space for an individual in a wheelchair to maneuver.

(g) It is an unlawful discriminatory housing practice to discriminate in land-use decisions or in the permitting of development based on race, color, religion, sex, national origin, handicapping condition, familial status, or, except as otherwise provided by law, the fact that a development or proposed development contains affordable housing units for families or individuals with incomes below eighty percent (80%) of area median income. It is not a violation of this Chapter if land-use decisions or permitting of development is based on considerations of limiting high concentrations of affordable housing.

3. Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.

The city of Greenville frequently collaborates with local and regional agencies and organizations to provide fair housing services and resources to the residents of the city. Initiatives such as fair housing seminars and awards recognizing fair housing efforts are some of the activities through the collaboration. Listed below are some of these partners.

The Housing Authority of the City of Greenville (HACG): HACG is the local public housing authority and operates and manages the public housing developments and HCV Program. HACG strictly adheres to federal and local fair housing laws and works in accordance with Americans with Disabilities Act requirements. HACG also provides fair housing information and is a resource to low- and moderate-income households in the city.

Greenville Human Relations Council (GHRC): GHRC promotes understanding and enhanced human relations among all people in Greenville. GHRC does this through education, advocacy, communication and initiation of actions that foster the recognition of and appreciation for the diversity in the city. GHRC recognizes and awards individuals, groups and organizations for their work in such efforts.

North Carolina Human Relations Commission (NCHRC): NCHRC provides services and programs with the purpose of improving relationships among all citizens of the state, while seeking to ensure equal opportunities in the areas of employment, housing, education and other services. NCHRC also provides resources via its website and through direct contact.

North Carolina Department of Insurance (NCDOI): NCDOI has the responsibility to help educate state residents about insurance-related issues. NCDOI can help with assistance by answering complicated questions about health insurance. Complaints can also be filed through NCDOI.

4. Additional Information

a. Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region.

Listed below are the primary agencies and organizations that are HUD certified as substantially equivalent agencies and/or important outreach and resources in the city.

Fair Housing Enforcement

The North Carolina Human Relations Commission (NCHRC) facilitates the resolution of fair housing complaints, creates public awareness of anti-discrimination laws and promotes equal housing opportunities. The commission resolves complaints of housing discrimination made by private persons. In accordance with the federal and state Fair Housing Acts, staff receives, investigates, conciliates and litigates claims of discrimination related to housing transactions on behalf of private persons. HUD certified the commission as a substantially equivalent agency in 1990.

The complaint form is available at:

<http://ncadmin.nc.gov/document/housing-discrimination-complaint-form>

Outreach and Resources

Private efforts also exist at the state level to assist with housing issues. The Fair Housing Project of Legal Aid of North Carolina represents victims of housing discrimination, conducts testing, and provides training to tenants, community groups, landlords, property managers and other housing providers. According to its website:

As a part of Legal Aid of North Carolina (LANC), the Fair Housing Project provides legal representation, advice, referrals, and information to individuals statewide who have experienced housing discrimination. Legal services are provided both through local LANC offices as well as through the Project's full-time staff.

Fair housing trainings and educational seminars conducted by the Project target renters and homebuyers; people with disabilities and their service providers; local governments, housing developers, property managers, and other housing providers; Spanish-speakers; and attorneys and housing professionals who represent individuals in mortgage and foreclosure-related matters.

b. The program participant may also include information relevant to programs, actions, or activities to promote fair housing outcomes and capacity.

The city of Greenville continues to fund affirmatively fair housing marketing actions within the city. These actions are inherent to each of the housing activities provided through the Community Development Department. Below is a list of activities and programs the city operates and promotes to further fair housing in the city.

- Education of the Fair Housing Laws occurs throughout the year and most specifically during the month of April, which is designated as "Fair Housing Month" and "Community Development Week".
- The Housing Partners Reception is held as part of a weeklong celebration of Community Development Week in the city. During the week, elected officials participate in a public education forum hosted by the city and the Housing Partners Reception.
- Fair Housing Month activities in the month of April include an educational seminar/forum. The community relations officer coordinates a community-wide Fair Housing Workshop and also disseminates information.
- Fair Housing Outreach is disseminated throughout the year. These activities include monthly public service announcements through the local media such as radio, television and newspapers. Information regarding fair housing mediation services and fair housing

workshops is distributed in printed form to local merchants and residents.

- Quarterly landlord/tenant workshops on affirmatively furthering fair housing.
- In 2013, the Analysis of Impediments to Fair Housing Choice was updated by the city and a Fair Housing Analysis was updated for the current consolidated plan. This update includes existing impediments to fair housing choice currently being addressed and the actions to remedy them. The update was shaped by public/private information regarding the real estate and banking industries, Greenville housing and community development activities, North Carolina and Greenville Human Relations Agencies, and the Greensboro and Atlanta HUD Offices of Fair Housing and Equal Opportunity.
- While the city of Greenville doesn't officially accept fair housing complaints in the city, the community relations officer will provide assistance to residents in the resolution of housing complaints by referring discrimination complaints to HUD and the North Carolina Human Relations Commission.
- Evaluation will be ongoing on the need for establishing a local Fair Housing Ordinance.

5. Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the lack of fair housing enforcement, outreach capacity, and resources and the severity of fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each significant contributing factor, note which fair housing issue(s) the selected contributing factor impacts.

- Lack of local private fair housing outreach and enforcement
- Lack of local public fair housing enforcement
- **Lack of resources for fair housing agencies and organizations**
- Lack of state or local fair housing laws
- Unresolved violations of fair housing or civil rights law
- Other

The ***Lack of resources for fair housing agencies and organizations*** are a significant contributing factor to the lack of fair housing enforcement and outreach capacity. While the city of Greenville has been able to leverage funds from outside federal grants, the number of projects they create are not enough to fill all the needs in the city. The city has focused economic and community development efforts targeting the northwest area of the city for more than a decade. Despite these efforts, segregation and poverty continue to persist in these R/ECAP tracts.

While it may seem that the lack of specific fair housing laws in the city may be a contributing factor, there is a state fair housing law that includes an exceptional provision regarding project siting. Given the extent of the North Carolina statute, any absence of a local ordinance specifically addressing fair housing is not a significant factor.

VI. Fair Housing Goals and Priorities

1. For each fair housing issue as analyzed in the Fair Housing Analysis section, prioritize the identified contributing factors. Justify the prioritization of the contributing factors that will be addressed by the goals set below in Question 2. Give the highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance.

Through the process of this Assessment of Fair Housing, and described in Section V of this report, the following fair housing issues have been identified within the city of Greenville:

1. Segregation
2. Racial and Ethnic Concentrations of Poverty
3. Disparities in Access to Opportunity
4. Disproportionate Housing Needs
5. Publicly Supported Housing Location and Occupancy
6. Disability and Access Issues
7. Fair Housing Enforcement, Outreach Capacity and Resources

For each fair housing issue, the associated contributing factors identified in this assessment are prioritized by degree of impact on the particular fair housing issue – the highest ranking contributing factor thus contributing the most toward the fair housing issue. Overall, the highest priority of all the contributing factors is the location and type of affordable housing, which is overwhelmingly the leading factor contributing to **Segregation** and **Racial and Ethnic Concentrations of Poverty** within the city. Community Opposition and Displacement of Residents Due to Economic Pressure also contribute to multiple fair housing issues including **Segregation**, **Racial and Ethnic Concentrations of Poverty** as well as **Disproportionate Housing Needs**. Equally as important, the Lack of Public Investments and the Lack of Local Fair Housing Enforcement also contribute to multiple Fair Housing Issues.

See following chart:

Identifying and Prioritizing Contributing Factors of Segregation		
Fair Housing Issue	Contributing Factor	Prioritization and Justification
Segregation	Zoning and land use ordinances can increase segregation along racial and ethnic lines. It is illegal to discriminate in this way, but the result of the ordinances may still be segregation. When laws determine the location and type of affordable housing into one area that can lead to segregation in communities where protected status and income are correlated.	
	Community Opposition to integration is a difficult thing to accurately judge but potentially exists in every community. There are often stereotypes that low-income residents will bring down the property value of the neighborhood and may attract crime, and low-income residents often lack a voice in policy discussions. Even when communities recognize the need for public housing and publicly subsidized housing, like LIHTC, throughout the city there can be a “Not In My Backyard” (NIMBY) view of public housing that may increase integration.	
	Rising housing costs can lead to displacement of residents due to economic pressures . As the cost of housing rises, it can push out low-income residents, particularly renters who do not see rising housing costs as an increase in the value of their investment. When income is strongly linked to race or ethnicity this can lead to racial and ethnic segregation. Low-income residents gather together along racial and ethnic lines and are priced out of more affluent areas.	
Identifying and Prioritizing Contributing Factors of R/ECAPs		
Fair Housing Issue	Contributing Factor	Prioritization and Justification
R/ECAPs	Rising housing costs can lead to displacement of residents due to economic pressures . As the cost of housing rises, it can push out low-income residents, particularly renters who do not see rising housing costs as an increase in the value of their investment. When income is strongly linked to race or ethnicity this can lead to racial and ethnic segregation. Low-income residents gather together along racial and ethnic lines and are priced out of more affluent areas.	
	The location and type of affordable housing can further segregation in ways that are similar to the above points. Subsidized housing can be pushed into certain neighborhoods or census tracts, and if income is correlated with race or ethnicity that can create segregation. The R/ECAP tract in Greenville has an very high rate of subsidized housing. In 2015, more than 30 percent of the population of the R/ECAP tract received subsidized housing, which is considerably higher than the city average of 4.54 percent. The following map displays the populations who live in subsidized housing. Clearly the areas that have a high black, non-Hispanic population receive more subsidized housing than other areas of the city and this may be contributing to the maintenance of the R/ECAP.	

Identifying and Prioritizing Contributing Factors of Disparities in Access to Opportunity		
Fair Housing Issue	Contributing Factor	Prioritization and Justification
Disparities in Access to Opportunity	<i>The availability, type, frequency, and reliability of public transportation</i> is an issue in Greenville. A large portion of the working population commute. Reliable transportation that is available when and where workers need it, particularly low-income workers, is essential to the community.	
	The <i>location of employers</i> is an issue that contributes to disparities in opportunity. Areas with economic opportunities lack the housing necessary for the workforce, which increases commute times and limits opportunities for low-income individuals.	
	The <i>location and type of affordable housing</i> is an issue that contributes to disparities in opportunity. Areas with economic opportunities lack the housing necessary for the workforce, which increases commute times and limits opportunities for low-income individuals.	
Identifying and Prioritizing Contributing Factors of Disproportionate Housing Needs		
Fair Housing Issue	Contributing Factor	Prioritization and Justification
Disproportionate Housing Needs	In order for a community to see economic growth and development it is necessary to have diverse housing options. <i>The availability of affordable units in a range of sizes</i> is a factor that can create, contribute to, perpetuate, or increase the severity of disproportionate housing needs in Greenville. The following table shows the availability of housing types within Greenville, the Pitt County, and North Carolina, as a whole. In particular, housing in the “missing middle” is particularly important in providing affordable housing options for residents. The “Missing Middle” are housing units that are neither large multi-family complexes nor 1-unit detached units. Many communities are missing this middle form of housing that many families desire. Within Greenville 39.2% of the housing falls in the “missing middle”, which is significantly higher than the county or state.	
	Rising housing costs can lead to <i>displacement of residents due to economic pressures</i> which adds to disproportionate housing needs. As the cost of housing rises, it can push out low-income residents, particularly renters who do not see rising housing costs as an increase in the value of their investment.	
Identifying and Prioritizing Contributing Factors of Publicly Supported Housing Location and Occupancy		
Fair Housing Issue	Contributing Factor	Prioritization and Justification
Publicly Supported	<i>Admissions and occupancy policies and procedures, including preferences in publicly supported housing:</i> Publicly supported	

Housing Location and Occupancy	<p>housing is located in majority black neighborhoods. According to HUD, public housing developments and residents using HCV housing vouchers are almost entirely black households pointing to segregation along racial lines. Access to public housing developments is not dependent on race, but because of location or preference, the developments are predominantly black. This is also true for a few Project-based Section 8 housing sites in the City.</p> <p>By contrast, while much smaller as a percentage of the total population in Greenville, qualified Hispanic households that meet the income requirements set by HUD for publicly supported housing are not utilizing these programs. There are 135 extremely low-income (0-30 percent AMI), 220 low-income (0-50 percent AMI), and 595 moderate-income (0-80 percent AMI) Hispanic households in the city, however only 10 Hispanic households use publicly supported housing programs. As the Hispanic population is one of the fastest-growing communities in Greenville, it is pertinent that they find adequate and affordable housing that suits their needs. Broadening services to include Hispanics may require a new approach to the community and new services and activities.</p>	
	<p>Impediments to mobility: The lack of access to high performing schools creates a barrier to advancement of students in Greenville, especially the northwestern areas of the city. Having limited access to high performing schools is a contributing factor to low college education participation rates, and therefore low education attainment. Educational attainment is directly tied to earnings, which is a key part in income mobility.</p> <p>According to the 2011-2015 ACS, only 17.4 percent of blacks 25 years and over had a bachelor’s degree or higher, which is below the citywide rate of 38 percent. As of 2015, persons with a bachelor’s degree in Greenville earned \$37,386, while persons with only a high school education earned \$23,414 annually. With fewer blacks graduating with a bachelor’s degree – likely resulting in lower incomes for individuals and families – disparities in access to opportunities such as high paying jobs and a lack of affordable housing will continue to persist in this community.</p>	
	<p>Lack of meaningful language access: Hispanic households occupy less than 1 percent of publicly supported housing units, but Hispanic households account for 2.3 percent of extremely low-income households and 2.3 percent of low-income households in Greenville. The city must be proactive in its efforts to open a dialogue with these groups to better understand why publicly supported housing is not benefitting the Hispanic community.</p>	
	<p>Quality of affordable housing information programs: This is related to the lack of meaningful language access in the city. The city must be proactive in its efforts to open a dialogue with these groups to better understand why publicly supported housing is not benefitting the Hispanic community.</p>	

	<p>Lack of Private Investment in Specific Neighborhoods: There is a disparity in private investment in the northwest and western area of Greenville compared to the rest of the city. While not a perfect indicator of a lack in private investment in an area, this part of the city has several areas with a very high percentage of business vacancies in commercial business locations. Business vacancies are also increasing in the western area of Greenville as opposed to the rest of the city. Furthermore, these neighborhoods are where there is a greater concentration of LIHTC and HCV Program residents.</p>	
<p>Identifying and Prioritizing Contributing Factors of Disabilities and Access Issues</p>		
Fair Housing Issue	Contributing Factor	Prioritization and Justification
<p>Disabilities and Access Issues</p>	<p>There is a Lack of affordable, integrated housing for individuals who need supportive services for persons with a disability in the City of Greenville. While concrete numbers are difficult to equate, only 17.5 percent of persons who were disabled over the age of 16 were employed, and when they were they earned less than non-disabled workers making affordable housing out of reach for many people with disabilities.</p>	
	<p>There is a Lack of assistance for housing accessibility modifications for disabled residents living in the city. While there are resources available for persons with a disability in Greenville, the large number of these individuals make it difficult to serve everyone when they are in need. The city has made it a high priority to preserve and increase affordable housing that is accessible for persons with disabilities in its latest consolidated plan.</p> <p>There is also a lack of Access to publicly supported housing for persons with disabilities. Persons with a disability face long wait times to have access into publicly supported housing in the city. While the HACG takes disabled families as preference in its application selection, wait times can take several years. For example, recently opened Section 8 housing University Towers with 60 units has a current wait time of 24 to 30 months.</p>	
	<p>Location of accessible housing: Housing that is both affordable and accessible for persons with a disability is difficult to find in the city. Census tracts in the city that are more affordable are located in the northwest tracts, nearby the R/ECAP tract. These tracts, however, show housing with a median year built of 1979 and older as well. Other areas with newer housing are also where home values and rents are higher making them less affordable. This in turn makes the location of accessible housing a contributing factor in disability and access issues.</p>	
	<p>Loss of Affordable Housing: As employed persons with a disability earn less than nondisabled persons, it becomes increasingly difficult for them to find decent and safe housing when housing is becoming less and less affordable in Greenville. In 2000, 20 percent of homeowners were cost burdened, however in 2015 that number grew to 28.2 percent – an increase of more than 40 percent. For</p>	

	renters, in 2000, 45.3 percent were cost burdened and that number rose to 59.4 percent – an increase of more than 30 percent.	
Identifying and Prioritizing Contributing Factors of Fair Housing Enforcement, Outreach Capacity, and Resources		
Fair Housing Issue	Contributing Factor	Prioritization and Justification
Fair Housing Enforcement, Outreach Capacity, and Resources	The <i>lack of resources for fair housing agencies and organizations</i> are a significant contributing factor. While the city of Greenville has been able to leverage funds from outside federal grants, the number of projects they create are not enough to fill all the needs in the city. The city has focused economic and community development efforts targeting the northwest area of the city for more than a decade. Segregation and poverty continues to persist in these R/ECAP tracts.	

2. For each fair housing issue with significant contributing factors identified in Question 1, set one or more goals. Using the table below, explain how each goal is designed to overcome the identified contributing factor and related fair housing issue(s). For goals designed to overcome more than one fair housing issue, explain how the goal will overcome each issue and the related contributing factors. For each goal, identify metrics and milestones for determining what fair housing results will be achieved, and indicate the timeframe for achievement.

Goal #1	Contributing Factors	Fair Housing Issues	Strategy	Measurement of Achievement	Responsible Program Participants
<p>Increase Access to Affordable Housing</p>	<p>Land Use and Zoning Laws; Community Opposition; Location and Type of Affordable Housing</p>	<p>Segregation; Disproportionate Housing Needs; Publicly Supported Housing; Fair Housing Enforcement</p>	<p>1a. Establish a formal “Affordable & Fair Housing Working Group”. The purpose of this group is to develop meaningful recommendations, advocate for policy changes and get political buy-in for affordable and fair housing initiatives.</p> <p>1b. Establish TBRA program to help low-income families achieve affordable rent.</p> <p>1c. Increase homeownership opportunities via down payment assistance.</p>	<p>1a.1 Formally establish the Working Group by end of Year 1.</p> <p>1a.2 Development and publish 3 meaningful recommendations by end of Year 2.</p> <p>1b.1 Formally establish the TBRA Program by end of Year 2.</p> <p>1b.2 Disseminate 20 TBRA vouchers by end of Year 3.</p> <p>1c.1 Assist 2 persons per year for the coming five program years achieve homeownership through down payment assistance</p>	<p>City of Greenville</p>

Goal #2	Contributing Factors	Fair Housing Issues	Strategy	Measurement of Achievement	Responsible Program Participants
Reduce Substandard Housing	Location and Type of Affordable Housing; Lack of public investments in specific neighborhoods	Segregation; R/ECAPs; Disproportionate Housing Needs; Publicly Supported Housing	2. Rehab substandard homes	2.1 Rehab 10 homes per year for the coming five program years. 2.2 At least 50% of rehabs to take place in R/ECAP tracts.	City of Greenville
Goal #3	Contributing Factors	Fair Housing Issues	Strategy	Measurement of Achievement	Responsible Program Participants
Increase Employment Training and Employment Opportunities	Lack of public investments in specific neighborhoods; Location of employers; Lack of private investments in specific neighborhoods	Segregation; R/ECAPs; Disproportionate Housing Needs; Publicly Supported Housing, Disparities in Access to Opportunities	3a. Increase financial literacy through increased partnership with Literacy Volunteers of America 3b. Increase job training programs for vulnerable populations through partnership with STRIVE. 3c. Increase city financial literacy training	3a.1 Train 20 people per year for the next five years in financial literacy 3a.2 Increase outreach in R/ECAP tracts 3a.3 Train 15 people from R/ECAP tracts per year in financial literacy 3b.1 Provide job training for 5 people per year for the next five years 3b.2 Increase outreach in R/ECAP tracts 3b.3 Provide job training for 20 people from R/ECAP tracts per year 3c.1 Provide literacy training for 20 people per year for the next five years	City of Greenville

				3c.2 Increase outreach in R/ECAP tracts 3c.3 Provide financial literacy training for 10 people from R/ECAP tracts per year	
Goal #4	Contributing Factors	Fair Housing Issues	Strategy	Measurement of Achievement	Responsible Program Participants
Increase Economic Development Activities & Investments	Lack of public investments in specific neighborhoods; Location of employers; Lack of private investments in specific neighborhoods	Segregation; R/ECAPs; Disproportionate Housing Needs; Publicly Supported Housing	4. Increase economic development activities that benefit low-income residents	4.1 Increase coordination between community and economic development departments. 4.2 Facilitate for the inclusion of affordable housing in new economic developments.	City of Greenville
Goal #5	Contributing Factors	Fair Housing Issues	Strategy	Measurement of Achievement	Responsible Program Participants
Increase Fair Housing Awareness and Education	Lack of resources for fair housing agencies and organizations;	Segregation; R/ECAPs; Publicly Supported Housing Location and Occupancy; Fair Housing Enforcement, Outreach Capacity and Resources	5a: Increase the number of fair housing education events 5b: Conduct fair housing education directly in R/ECAP tracts	5a: Increase number of fair housing events to 3 per year for the next five years. 5b1: Increase the number of participants from R/ECAP tracts to 25 every year 5b2: Hold 2 fair housing education events in a R/ECAP tract per year.	City of Greenville

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