



**Analysis of Impediments to Fair Housing Choice
City of Greenville, North Carolina**

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Table of Contents

Executive Summary	4
Methodology	6
Purpose of Fair Housing	9
Fair Housing Concepts	11
Assessment of Previously Identified Impediments	12
Demographic Summary	16
Racial/Ethnic Populations	16
National Origin Populations	18
Limited English Proficiencies	19
Individuals with Disabilities by Disability Type.....	20
Families with Children	21
Disability and Access Analysis	21
Disability Disparities in Access to Opportunity.....	28
Housing Accessibility	42
General Issues	55
Segregation/Integration	55
Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs).....	82
Disparities in Access to Opportunity.....	91
Education	92
Employment.....	94
Transportation	98
Access to Low Poverty Neighborhoods	104
Access to Environmentally Healthy Neighborhoods	107
Disproportionate Housing Needs	113
Publicly Supported Housing Analysis	138
Overview	138
Legislation Pertaining to Fair Housing	138
Promoting Fair Housing and Fair Lending	142
Community Development Block Grants.....	143
HOME Investment Partnership Program.....	144
Emergency Shelter Grant (ESG)	145
US Department of Agriculture (USDA) – Rural Development	146
Housing Opportunities for Persons with AIDS (HOPWA)	146
Low Income Housing Tax Credit Program	146
Protected Groups	147
Publicly Supported Housing Location and Occupancy	153
Fair Housing	180
Fair Housing Complaints	182
Fair Housing Agencies	183
NIMBY (Not in My Backyard)	184
New HUD Fair Housing Guidance	185
Additional Information	186
Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors	188

Fair Housing Issues & Goals	189
Goal: 1 Increase Access to Affordable Housing	190
Goal 2: Reduce Substandard Housing	192
Goal 3: Increase Employment Training and Employment Opportunities	193
Goal 4: Increase Economic Development Activities & Investments	195
Goal 5: Increase Fair Housing Awareness and Education	197

Executive Summary

The following Analysis of Impediments to Fair Housing Choice (AI) is a modified document that was originally completed to comply with the Assessment of Furthering Fair Housing (AFFH) rules and regulations as established by the US Department of Housing and Urban Development (HUD). In the fall of 2017, the City of Greenville worked to complete their first AFFH utilizing the new HUD provided template, data and mapping tools made available to grantees. However, early January 2018 HUD provided a nation-wide extension for submission AFFH reports – effectively suspending the AFFH report requirements. Furthermore, HUD provided additional guidance on January 5, 2018 suggesting grantees to continue utilizing the data, maps, and template provided as part of the AFFH tools to complete their AI. AS such, the analysis complies with this guidance.

Introduction

The AI serves as a comprehensive look at fair housing issues in the City of Greenville. The report includes a review of the City’s efforts to affirmatively further fair housing per federal law, analysis of various demographic, economic, housing indicators, a review of public and private sector policies that affect fair housing, and fair housing goals and priorities.

Greenville is located in Pitt County near the South Carolina’s eastern Atlantic coastline. Greenville has experienced steady growth over the past couple decades. According to the most recent American Community Survey, the 2015 population in the city was 88,598. That represents a 46.5 percent population growth since the year 2000 – twice the statewide rate of 22.3 percent. A growing population has many economic impacts; among them is strong growth in the housing market.

While the overall population grew, growth among the race groups varied widely. From 2000 to 2015, whites grew from a population of 37,133 (61.4 percent of the total population) to 48,587 (54.8 percent). In the same time period, blacks grew from 20,649 (34.1 percent) to 33,454 (37.8 percent). Asians grew from 1,098 (1.8 percent) to 2,579 (2.9 percent) and persons who identified as Hispanic grew from 1,244 (2.1 percent) to 3,640 (4.1 percent). Even while the population of whites grew in the city, the overall percentage decreased from 2000 to 2015, while the black, Asian and Hispanic population grew (2000 Census, 2011-2015 ACS).

U.S. Department of Housing and Urban Development (HUD) provides demographic and housing data for the Assessment of Fair Housing (AFH) which is used in this report and is supplemented with other data sources. Some observations from the AFH data show that 19.4 percent of the population is under the age of 18 years and 8.8 percent is more than 65 years old. Approximately 10.6 percent of all people ages 5 and older have a disability with ambulatory impairment (i.e., a physical disability in which the individual is unable or has difficulty moving freely from place to place without aid) and cognitive difficulty the two

most common types. Foreign-born individuals and persons with limited English proficiency (LEP) have also been slowly rising in Greenville.

Data for public housing in Greenville was also provided by HUD. The Greenville Housing Authority manages and operates public housing in the city. Publicly supported housing was available in these categories: Public housing development units, Project-based Section 8, other HUD multifamily units, and the Housing Choice Voucher (HCV) program. Altogether, there were 1,975 housing units available for low- and moderate-income families in the city. Black households were by far the largest race group residing in public housing in Greenville.

The City of Greenville has developed five goals to address impediments to fair housing. These goals use strategies that are measurable and attainable to address the factors that contribute to fair housing issues. Fair housing issues can not all be addressed in the short-term, but these goals and strategies will lay a foundation for long-term success.

Goal 1: Increase Access to Affordable Housing – Lack of affordable housing is incredibly pervasive in Greenville. This is particularly true for low-income Black and Hispanic households who experience higher rates of poverty, lower incomes, and lower rates of homeownership than white residents. To address this issue the City of Greenville will work to establish a formal fair housing working group, establish a Tenant-Based Rental Assistance program, increase homeownership opportunities using down-payment assistance, and increase mobility-based counseling efforts in all affordable housing programs.

Goal 2: Reduce Substandard Housing – Increasing the availability of affordable housing will not address all fair housing needs. Many residents prefer to stay in their homes even if affordable options become available elsewhere in the city. This is particular problem in R/ECAP tracts where substandard housing is present at much higher rates than elsewhere in the city. The strategies in this goal aim to improve the quality of the housing stock in the city, particularly homes located in R/ECAP tracts. The City of Greenville plans to rehab substandard homes throughout the city with a focus on R/ECAP tracts.

Goal 3: Increase Employment Training and Employment Opportunities – An additional aspect of fair and affordable housing is the availability of economic opportunities in the City. Greater access to education and employment will raise household income which will increase the number of homes that are affordable to residents. The City of Greenville plans on improving employment and economic opportunities through partnerships with the Literacy Volunteers of America and STRIVE. These partnerships will allow the City to train vulnerable populations in marketable skills and increase literacy. Special focus will be on R/ECAP tracts due to the lower levels of education and higher levels of unemployment.

Goal 4: Increase Economic Development Activities & Investments – Increasing education is important to address the economic needs of households but it is also necessary to provide targeted investments in areas. The City of Greenville will increase economic

development activities in areas that will primarily benefit low-income minority residents. There will also be increased coordination between community and economic development departments in the city which will help facilitate the inclusion of affordable housing in new economic development projects.

Goal 5: Increase Fair Housing Awareness and Education – It is imperative that residents are aware of their fair housing rights and the programs that are available to them. This goal aims to increase education among residents by hosting fair housing education events, particularly in R/ECAP tracts.

Methodology

The Greenville Analysis of Impediments to Fair Housing Choice (AI) is broken down into three parts:

1. Assessment of past goals and actions to reduce disparities in access;
2. Fair housing analysis, which includes a demographic summary, general issues, PHA analysis, disability access analysis and fair housing analysis
3. 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 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, HMDA, the Greenville Housing Authority, Great Schools, Valassis Lists, and ACS/Census GIS maps via PolicyMap.

Fair Housing Issues

HUD has recognized seven key areas in Fair Housing Issues for the AFH which will also be reviewed in this AI. 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 above 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

Purpose of 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 in the Civil Rights Movement. The passing of the Fair Housing Act in 1968 was a critical step towards addressing this complex problem, but it was far from a solution. Since the passing of the Act, community groups, private businesses, concerned citizens, and government agencies at all levels have worked diligently to battle housing discrimination. The Fair Housing Act mandates that HUD ‘affirmatively further fair housing’ through its programs. Towards this end, HUD requires funding recipients to undertake fair housing planning (FHP) in order to proactively take steps that will lead to less discriminatory housing markets and better living conditions for minority groups and vulnerable populations.

As part of the HUD-mandated Consolidated Planning process, the City of Greenville is finalizing its Five Year Consolidated Plan for 2018. The Five Year Consolidated Plan is an assessment of the economic and social state of the city, as well as local government policies and programs aimed at improving the living environment of its low- and moderate-income residents. The Strategic Plan includes a vision for the region that encompasses the national objectives of the Community Development Block Grant (CDBG) and HOME Investments Partnership program and is accompanied by a first year Action Plan that outlines short-term activities to address identified community needs. As part of the planning process, Greenville must also affirmatively further Fair Housing and undertake Fair Housing planning. This process includes the preparation of an Analysis of Impediments to Fair Housing Choice.

This 2018 Analysis of Impediments to Fair Housing Choice is an in-depth examination of potential barriers, challenges and opportunities for housing choice for Greenville residents on a citywide scale. Impediments to Fair Housing are defined as any actions, omissions, or decisions based upon race, color, religion, national origin, disability, gender, or familial status that restrict, or have the effect of restricting, housing choice or the availability of housing choice. Fair Housing Choice is the ability of persons of similar income levels – regardless of race, color, religion, national origin, disability, gender, or familial status – to have the same housing choices.

The Analysis of Impediments is an integral component of the fair housing planning process and consists of a review of both public and private barriers to housing choice. It involves a comprehensive inventory and assessment of the conditions, practices, laws and policies that impact housing choice within a jurisdiction. It provides documentation of existing, perceived and potential fair housing concerns and specific action strategies designed to mitigate or eliminate obstacles to housing choice for the residents. The Analysis is intended to serve as a strategic planning and policy development resource for local decision makers, staff, service providers, the private sector, and community leaders in the city. As such, this Analysis of Impediments will ultimately serve as the foundation for fair housing planning in the region.

The long-term objective of this Analysis of Impediments to Fair Housing Choice is to make housing choice a reality for residents of Greenville through the prevention of discriminatory housing practices. One goal of the study is to analyze the fair housing situation in the city and assess the degree to which fair housing choice is available for area residents. A second goal is to suggest ways to improve the level of choice through continued elimination of discriminatory practices, if any are found to exist. The sections that follow provide a brief overview of the legal and conceptual aspects of fair housing planning and policy.

Fair Housing Concepts

Housing choice plays a critical role in influencing individuals' and families' abilities to realize and attain personal, educational, employment and income potential. The fundamental goal of HUD fair housing policy is to make housing choice a reality through sound planning. Through its on-going focus on Fair Housing Planning, HUD "is committed to eliminating racial and ethnic discrimination, illegal physical and other barriers to persons with disabilities, and other discriminatory practices in housing." Among the recurring key concepts inherent in fair housing planning are:

- *Affirmatively Further Fair Housing (AFFH)* – Under its community development programs, HUD requires its grantees to affirmatively further fair housing through three broad activities: 1) conduct an *Analysis of Impediments to Fair Housing Choice*; 2) act to overcome identified impediments; and 3) track measurable progress in addressing impediments and the realization of fair housing choice.
- *Affordable Housing* – Decent, safe, quality housing that costs no more than 30% of a household's gross monthly income for utility and rent or mortgage payments.
- *Fair Housing Choice* – The ability of persons, regardless of race, color, religion, national origin, disability, gender, or familial status, of similar income levels to have the same housing choices.
- *Fair Housing Planning (FHP)* – Fair Housing Planning consists of three components: the *Analysis of Impediments*, a detailed *Action Plan* to address identified impediments, and a monitoring process to assess progress in meeting community objectives. FHP consists of a close examination of factors that can potentially restrict or inhibit housing choice and serves as a catalyst for actions to mitigate identified problem areas.
- *Impediments to Fair Housing* – Any actions, omissions, or decisions based upon race, color, religion, national origin, disability, gender, or familial status that restrict, or have the effect of restricting, housing choice or the availability of housing choice.
- *Low and Moderate Income* – Defined as 80% of the median household income for the area, subject to adjustments for areas with unusually high or low incomes or housing costs. *Very low-income* is defined as 50% of the median household income for the area, subject to adjustments for areas with unusually high or low incomes or housing costs. Poverty level income is defined as 30% or below median household income.
- *Private Sector* – Private sector involvement in the housing market includes banking and lending institutions, insurance providers, real estate and property management agencies, property owners, and developers.
- *Public Sector* – The public sector for the purpose of this analysis includes local and state governments, regional agencies, public housing authorities, public transportation, community development organizations, workforce training providers, and community and social services.

Assessment of Previously Identified Impediments

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 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 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 aid 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 Greenville Housing Authority (GHA) assisted 40 individuals with HIV/AIDS with housing opportunities using HOPWA funds. Currently, GHA 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.

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.

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 part a R/ECAP tract in the city. Today, this area is no longer a R/ECAP tract. 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.

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.

Demographic Summary

Racial/Ethnic Populations

Greenville is in the east-central portion of North Carolina and is the principal city for the Greenville Metropolitan Statistical Area. 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.

Race/Ethnicity	Jurisdiction: Greenville
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	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 and 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								

Disability and Access Analysis

Population Profile

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%), followed by cognitive difficulty (4.6%), independent living (3.5%), self-care (2.4%), hearing difficulty (2.2%), and vision difficulty (2.1%).

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%

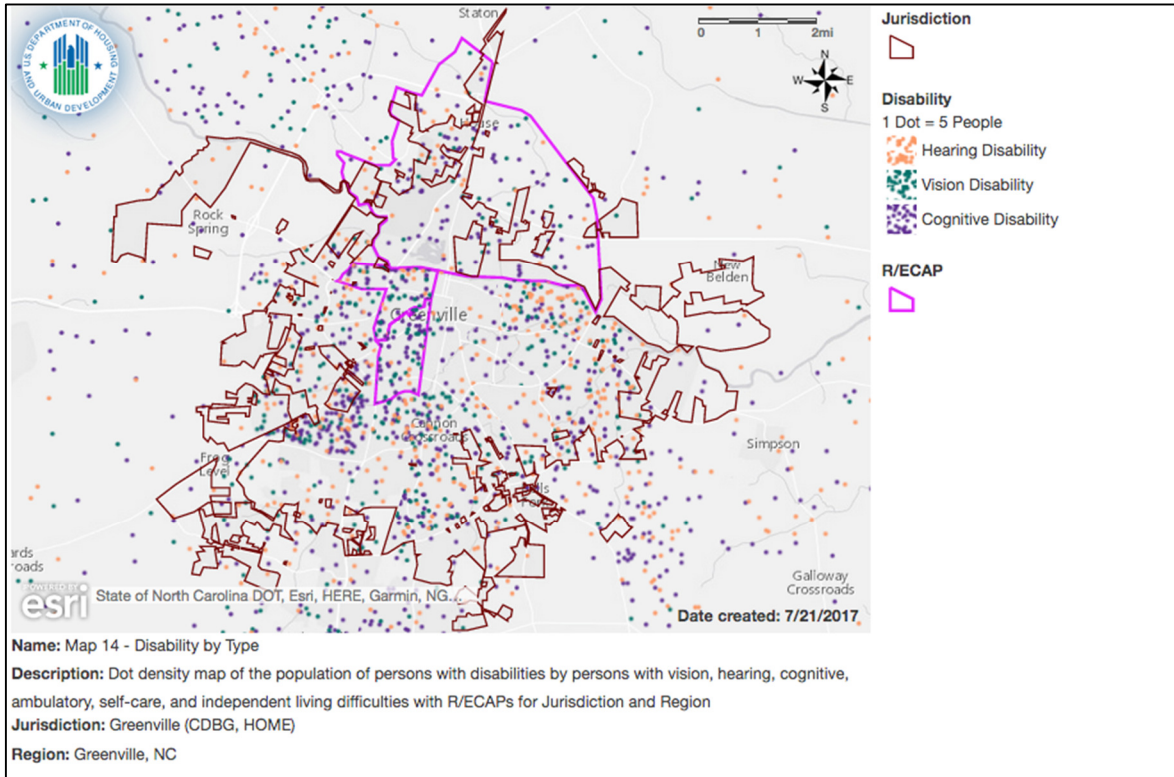
Vision difficulty	1,719	2.13%	3,843	2.43%
Cognitive difficulty	3,684	4.57%	8,207	5.20%
Ambulatory difficulty	4,460	5.53%	11,207	7.10%
Self-care difficulty	1,940	2.41%	4,674	2.96%
Independent living difficulty	2,854	3.54%	7,225	4.57%
Note 1: All % represent a share of the total population within the jurisdiction 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 of 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, however there is a cluster of the disability type in 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). Finally, 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 concentration of persons with a disability in the City along with R/ECAP tracts 37147000701 and 37147000702.

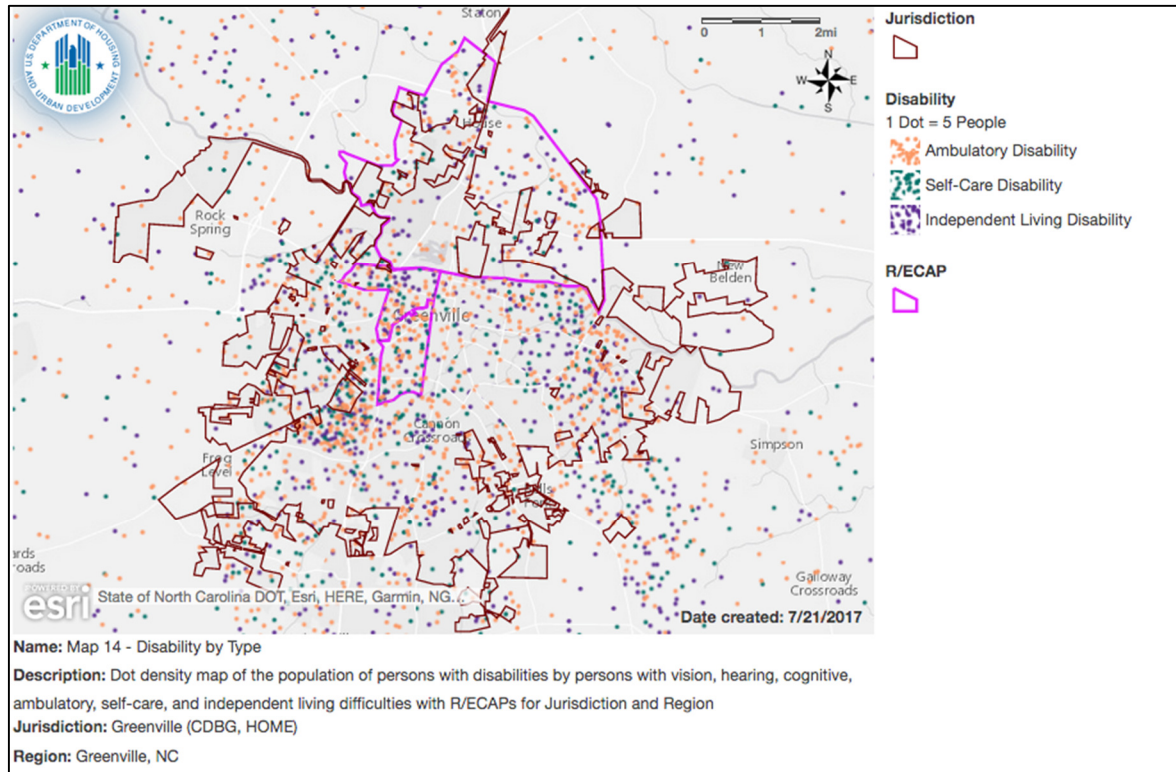
HUD Map 14 – Disability by Type: Hearing, Vision & Cognitive Disability



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

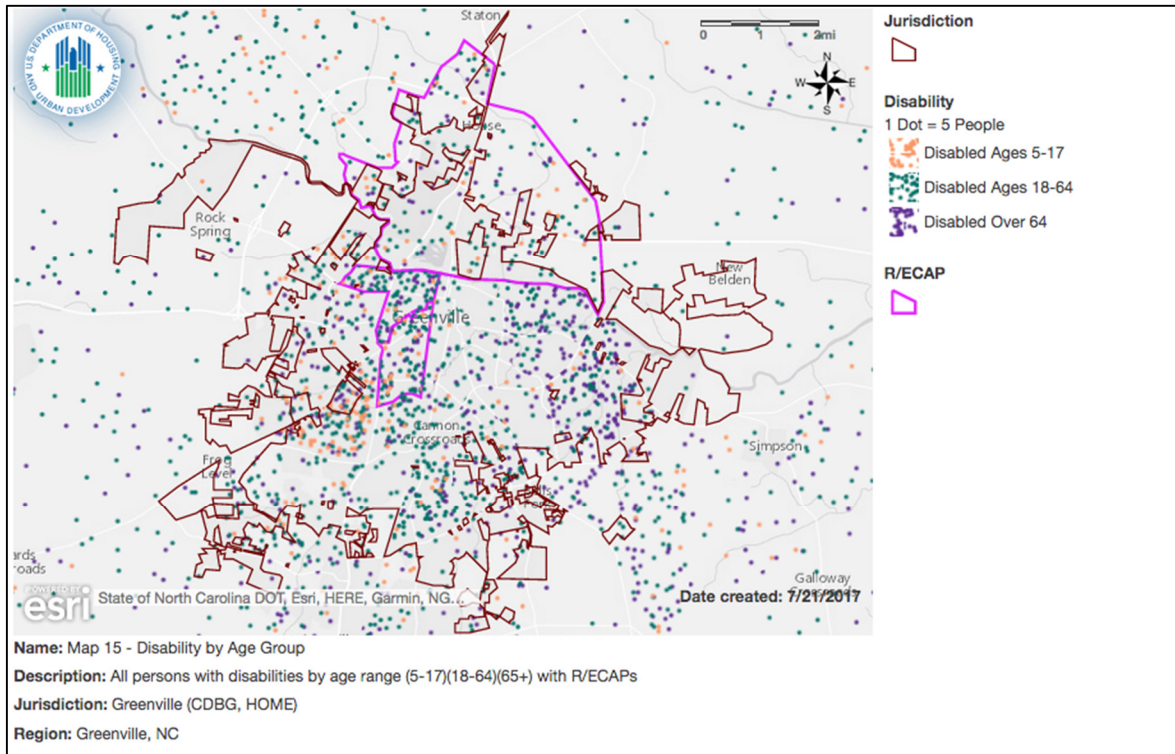


Source: HUD

Geographic Patterns

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 south-east areas from the R/ECAP tract towards Fire Tower Rd.

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

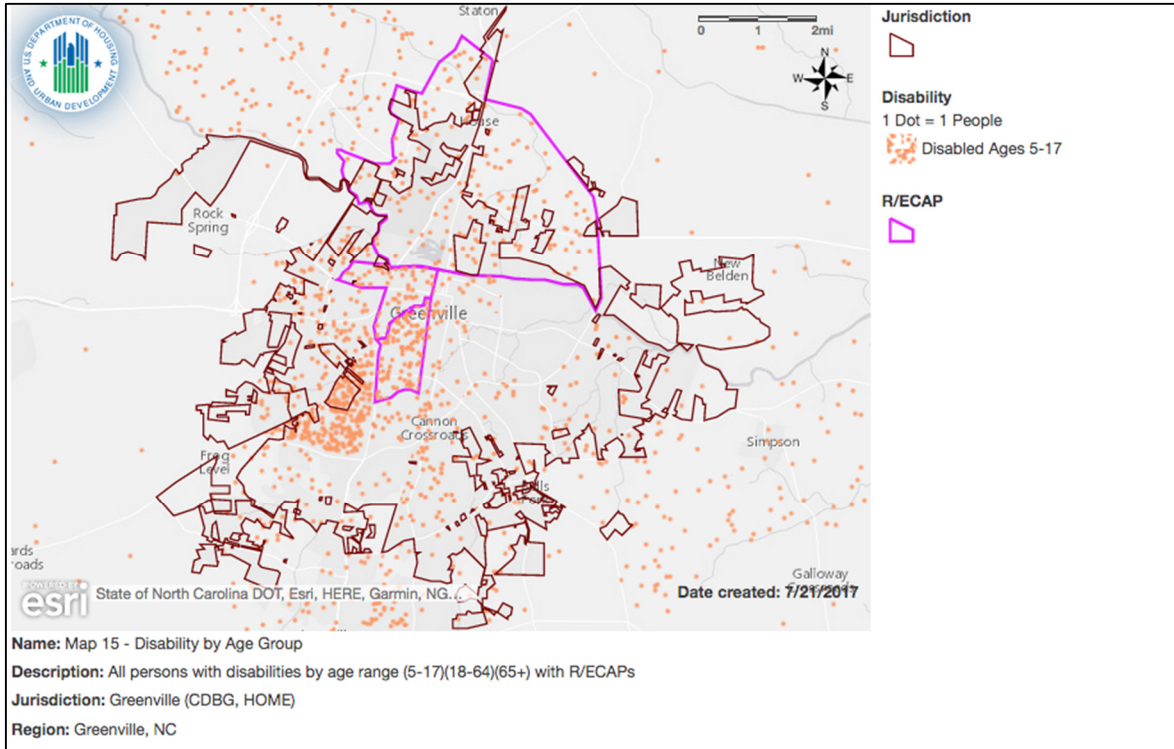


Source: HUD

Persons Age 5-17 with Disabilities

Persons age 5-17 years old make up 13 percent of the disabled population in Greenville ages 5 years and older. According to HUD Map 15, Census Tract 3714700602 (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

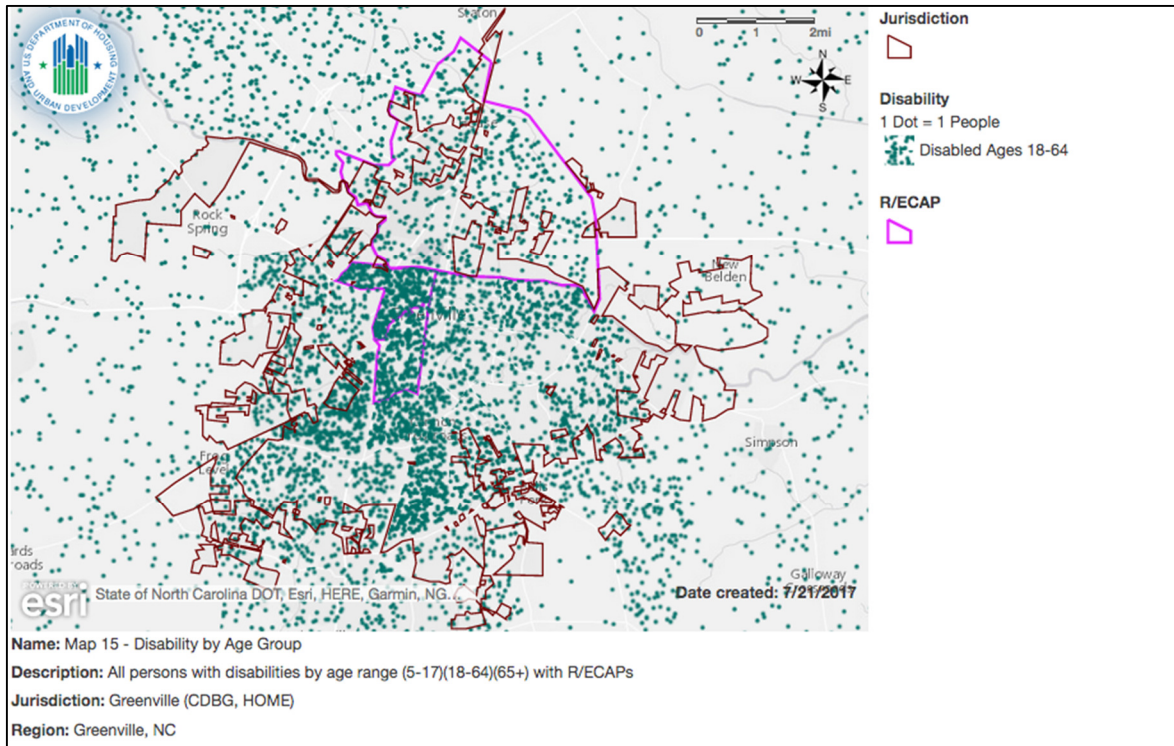


Source: HUD

Persons Age 18-64 with Disabilities

There are 4,701 disabled persons age 18-64 years old in the City, which make up 55.3 percent of all the disabled population 5 years and older. Persons 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 Rd) 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 Years



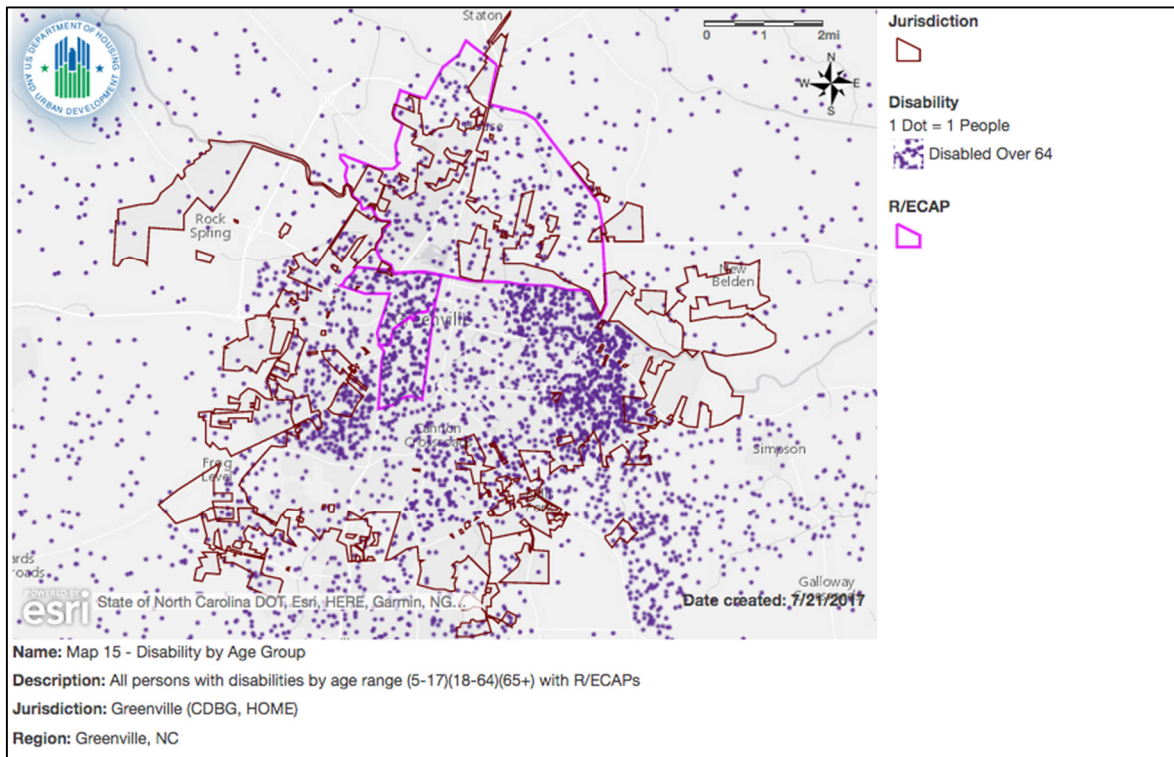
Source: HUD

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), however a large number of them are located in the northwest areas of the City (Census Tract 37147000201 north by Tar River and 37147000302 northeast of Greenville Blvd).

As people age, some elderly in the population may start to develop unique and special needs to be able to live independently in the community. According to the 2011-2015 ACS, a third of the elderly ages 65-74 years in the City experienced a disability (27.6%) and elderly over 75 years old experienced over half with a disability (61.8%). Those estimates are well above all younger age cohorts.

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



Source: HUD

Disability Disparities in Access to Opportunity

Government services and facilities

The City of Greenville complies with 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. Furthermore, the City government does not discriminate on the basis of any class or characteristic protected by law. The City has also published on its website its ADA Compliance Notice for employment, effective communication and modifications to policies and procedures that can be found at the following 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 US 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 people with disabilities have an equal opportunity to enjoy all of its facilities, programs, services and activities. Anyone who needs 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) PO Box 7207, Greenville, North Carolina 27835-7207; (Physical) 200 West Fifth Street, Greenville, North Carolina 27834; Telephone: (252) 329-4452; Facsimile: (252) 329-4313; or Email: lmccarthy@greenvillenc.gov.

The City has also provided a Grievance Procedure as established to meet the requirements of the ADA. If anyone feels they have been discriminated against based on disability, they may file a complaint with the ADA Coordinator through writing and contain information about the alleged incident. 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 the following web address: www.greenvillenc.gov/live/ada-compliance-notice.

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 (ADA). 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 2-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 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 and grocery stores as well as connect to destinations where there is housing, jobs, recreation and food.

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 persons who are disabled. Routes are fixed, and passengers can be picked up at designated stops throughout the City.

GREAT is ADA compliant and also complies to the State of North Carolina 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, but must notify the operator before boarding and may not occupy a seat or obstruct aisles or exits.

Paratransit service is also available for persons with a disability that prevents them from being able to access GREAT buses. 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 Street 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 telephone (1-800-USA-RAIL), TTY (1-800-523-6590) and at any staffed station during regular ticket office hours, however 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. There is also no shelter and no accessible water.

Airport Services

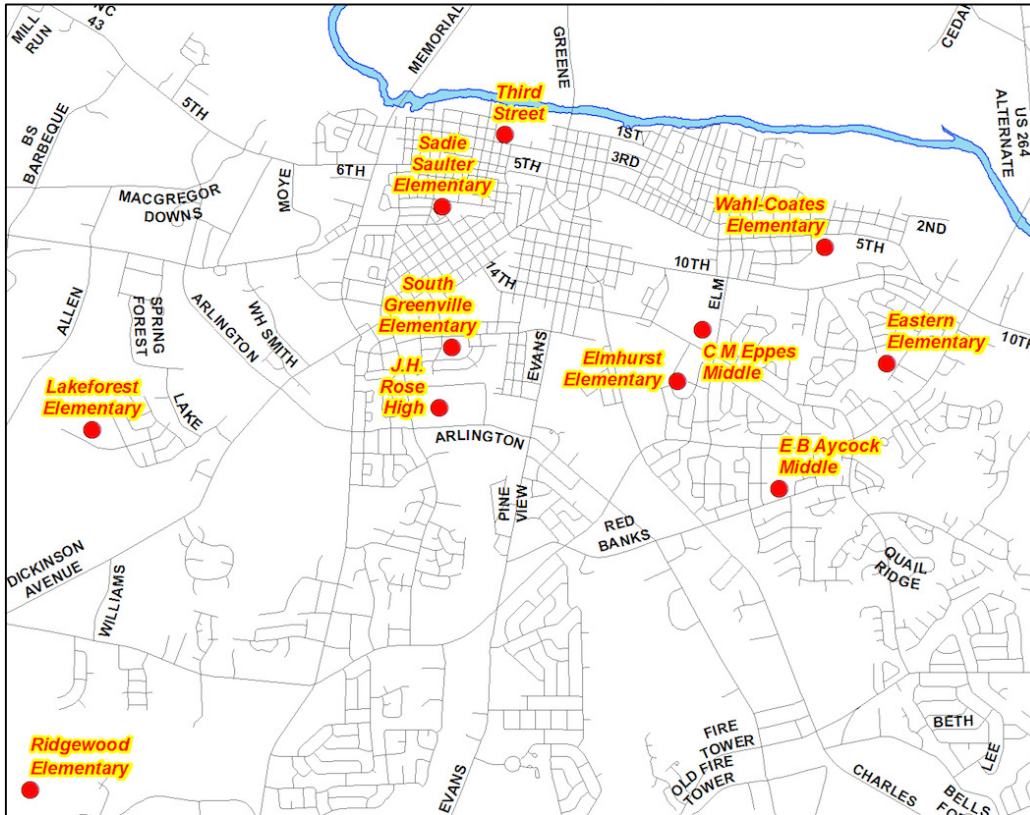
Pitt-Greenville Airport offers commercial flight services from American Airlines. The airport is located just two miles north of East Carolina University and three miles from Vidant Medical Center. The airport is accessible from Interstate 40 and 95. American Airlines offers special assistance through its disability team. Special assistance can be requested during booking for wheelchair service, and for assistance for hearing, vision and 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>

Proficient schools and educational programs

Public schools in the City of Greenville are managed by Pitt County Schools (PCS). PCS is compliant with Federal Law including the ADA and 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 (ECD) 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. ECD 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-k services.

MAP: Public Schools K-12 in Greenville



Source: Pitt County Schools

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 Industry as compared to non-disabled persons in the City, there was a higher percentage of persons with a disability employed in Manufacturing, Wholesale Trade, and Finance and insurance, and real estate and rental and leasing. There was less of a percentage of persons who were disabled working in Educational services, and health care and social assistance and Arts, entertainment, and recreation, and 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 US Equal Employment Opportunity Commission (EEOC), which enforces the American with Disabilities Act of 1990

(ADA) 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 1 (800) 669-4000 or TTY 1 (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 of 1990 (ADA). Qualified persons with a disability may contact the ADA Coordinator at: (Mailing) PO Box 7207, Greenville, North Carolina 27835-7207; (Physical) 200 West Fifth Street, Greenville, North Carolina 27834; Telephone: (252) 329-4452; Facsimile: (252) 329-4313; or Email: lmccarthy@greenvillenc.gov.

Access to Accommodations

In accordance with the American with Disabilities Act of 1990 (ADA), 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 any person who is disabled and wishing 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 ADA Coordinator as soon as possible, but no later than 48 hours before the scheduled event. The ADA Coordinator can be contacted through any of the following channels:

Mail: PO Box 7207, Greenville, North Carolina 27835-7207
Physical Location: 200 West Fifth Street, Greenville, North Carolina 27834
Telephone: (252) 329-4452
Facsimile: (252) 329-4313
Email: lmccarthy@greenvillenc.gov

Employment Procedure

As the City provides equal employment opportunities to qualified persons with a disability (physical or mental disability), the City will provide reasonable accommodation for interested applicants and for current employees with a disability. During the application process, persons with a disability should contact the City of Greenville's Human Resources (HR) department. Employees with a disability should contact the HR department for any accommodation they may require. The City's Personnel Policy governs employment related complaints for discrimination on the basis of disability. The HR department can be reached at: City Hall, 200 West Fifth Street, Greenville, NC 27858; (Phone) (252) 329-4492.

Grievance Procedure

The City of Greenville has established a detailed Grievance Procedure for person with a disability that 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 information about the alleged discrimination. Information that should be included in the letter is their name, phone number of complainant and location, the date of the incident, and a detailed description of the problem. Complaints may also be filed though 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 ADA Coordinator by mail at: PO 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 of the complaint.

Homeownership Difficulties

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 ADA codes, which will likely add 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 amount of homes that may require accommodations in Greenville. (Source: HUD AFH Data Table 13 – Disability by Type)

Disproportionate Housing Needs

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

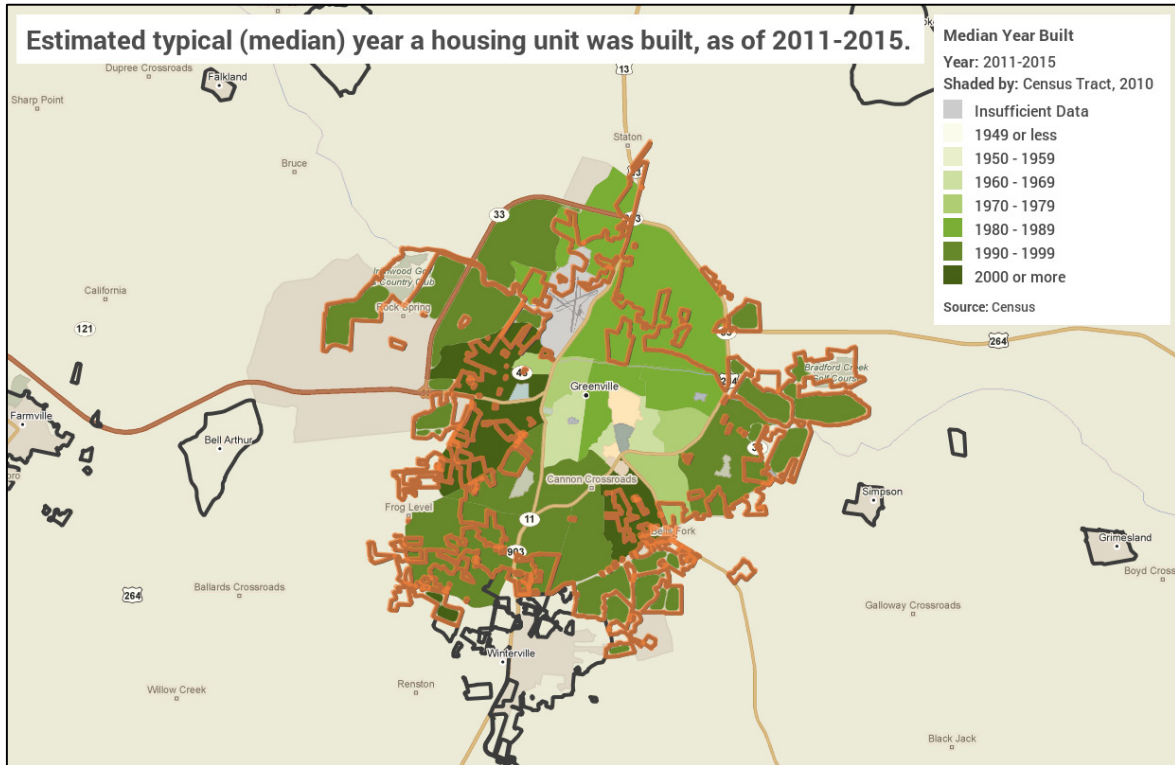
Disability Type	(Greenville, NC CDBG, HOME) Jurisdiction	
	#	%
Hearing difficulty	1,751	2.17%
Vision difficulty	1,719	2.13%
Cognitive difficulty	3,684	4.57%
Ambulatory difficulty	4,460	5.53%
Self-care difficulty	1,940	2.41%
Independent living difficulty	2,854	3.54%
Note 1: All % represent a share of 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 then 3.5 percent are with independent living difficulty. There are also 2.4 percent with self-care difficulty, and 2.1 percent with vision difficulty that would likely require accommodations to allow these persons to live independently or with family in homes.

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%) 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.

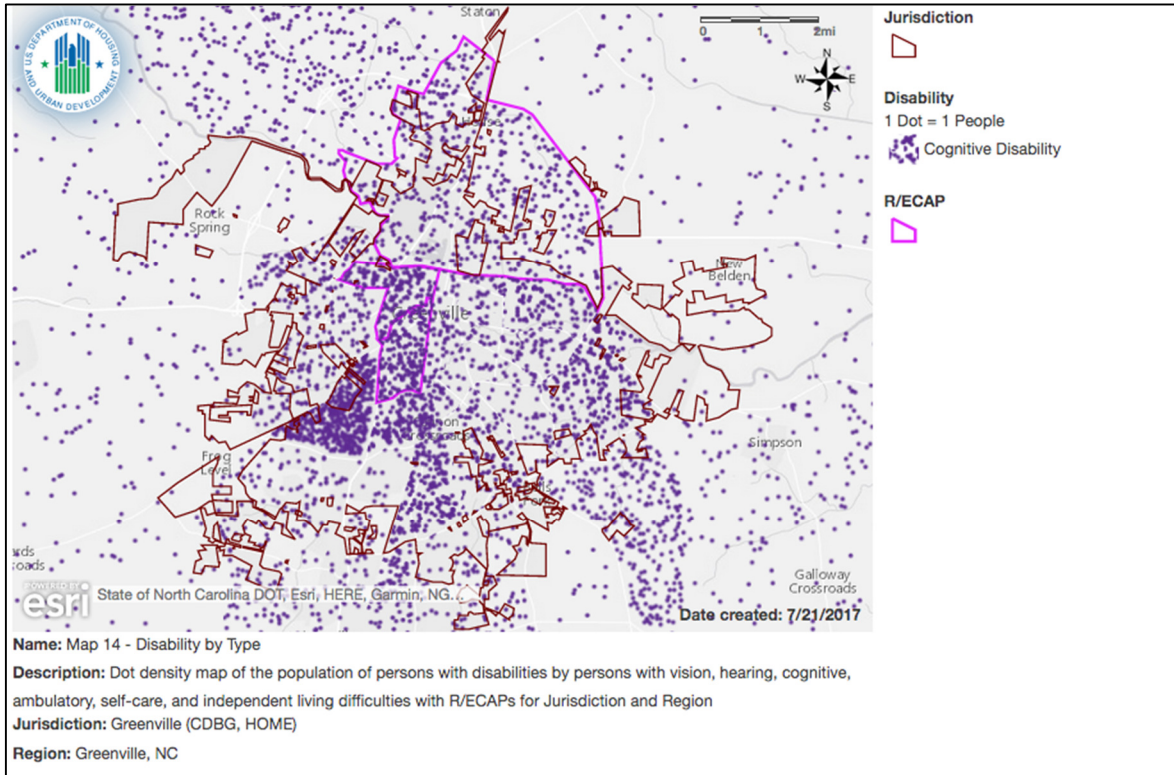
MAP: Median Year a Housing Unit was Built



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 actually 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 where there is a high number of persons with this disability are also located in tracts where housing was built more recently.

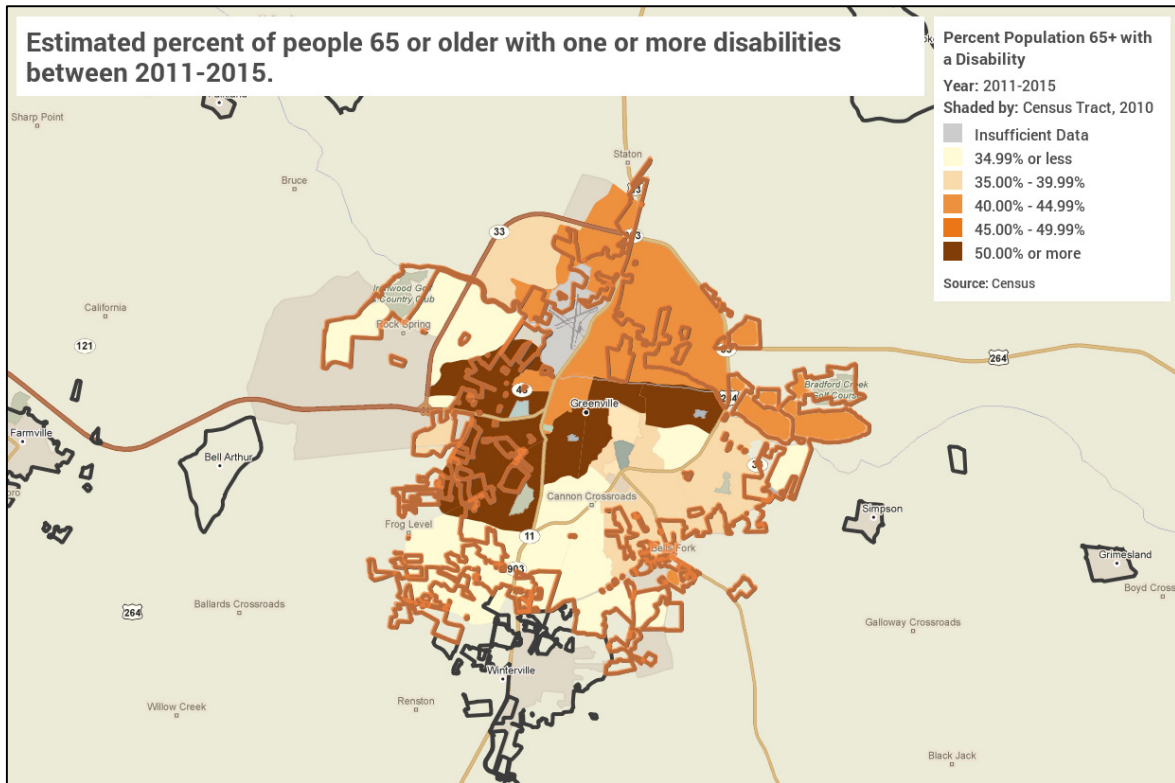
Additional Information

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 65 years and over experience a disability rate much higher than the general population city-wide rate of disabled persons (9.9%). Approximately 27.6 percent of elderly 65 to 74 years old were with a disability and elderly 75 years and over 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 over with a disability are found in higher concentrations in north central areas of the City. Tracts where there is a concentration of 50 percent or more elderly with a disability are listed below:

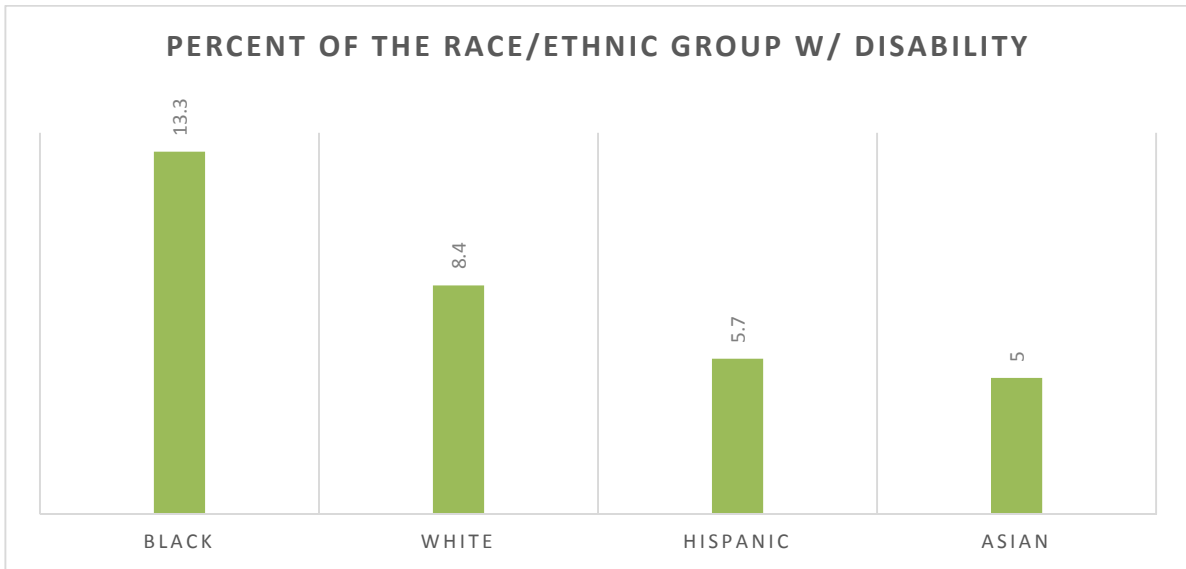
37147000702: R/ECAP tract

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

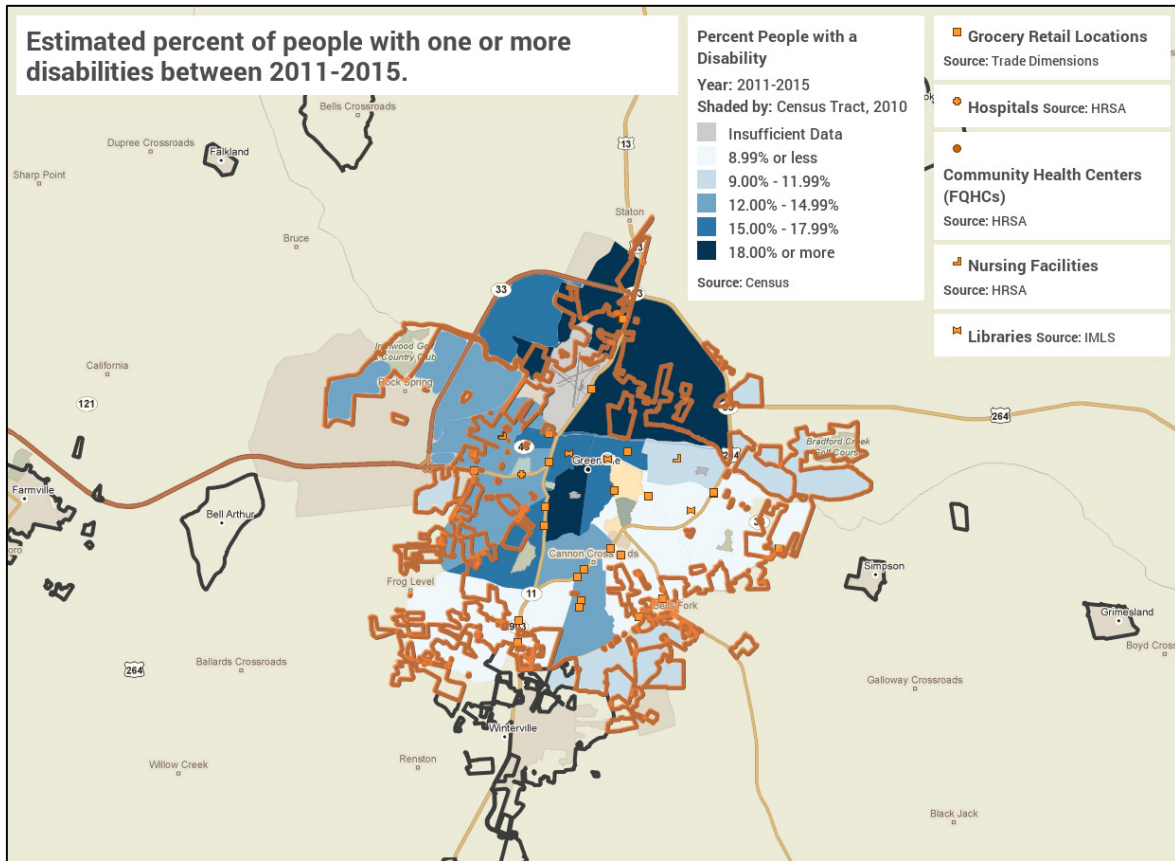
The disability rate for the City as a whole was 9.9 percent. All race and ethnic groups except for Blacks have a disability rate lower than the Citywide rate. Approximately 13.3 percent of Blacks were with a disability. Asians had a disability rate of 5 percent, and ethnic Hispanics were with only 5.7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



Source: 2011-2015 ACS (S1810)

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 lives.

MAP: People with Disabilities and Access



Source: 2011-2015 ACS vis PolicyMap

Disability and Access Issues Contributing Factors

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 over 40 percent. For renters, in 2000, 45.3 percent were cost burdened and that number rose to 59.4 percent – an increase of over 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 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.

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 GHA 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. However, these tracts 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.

Housing Accessibility

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. However, high home values and rents result in much of the housing stock being out of the affordable range 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% 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 are 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% of income), almost a quarter of every household in Greenville is severely cost burdened (24.1%). Blacks (27%) and Other, Non-Hispanic (28.1%) all had more severely cost burdened households than the Citywide average. (Source: HUD AFH Table 10 – Demographics of Households with Severe Housing Cost Burden).

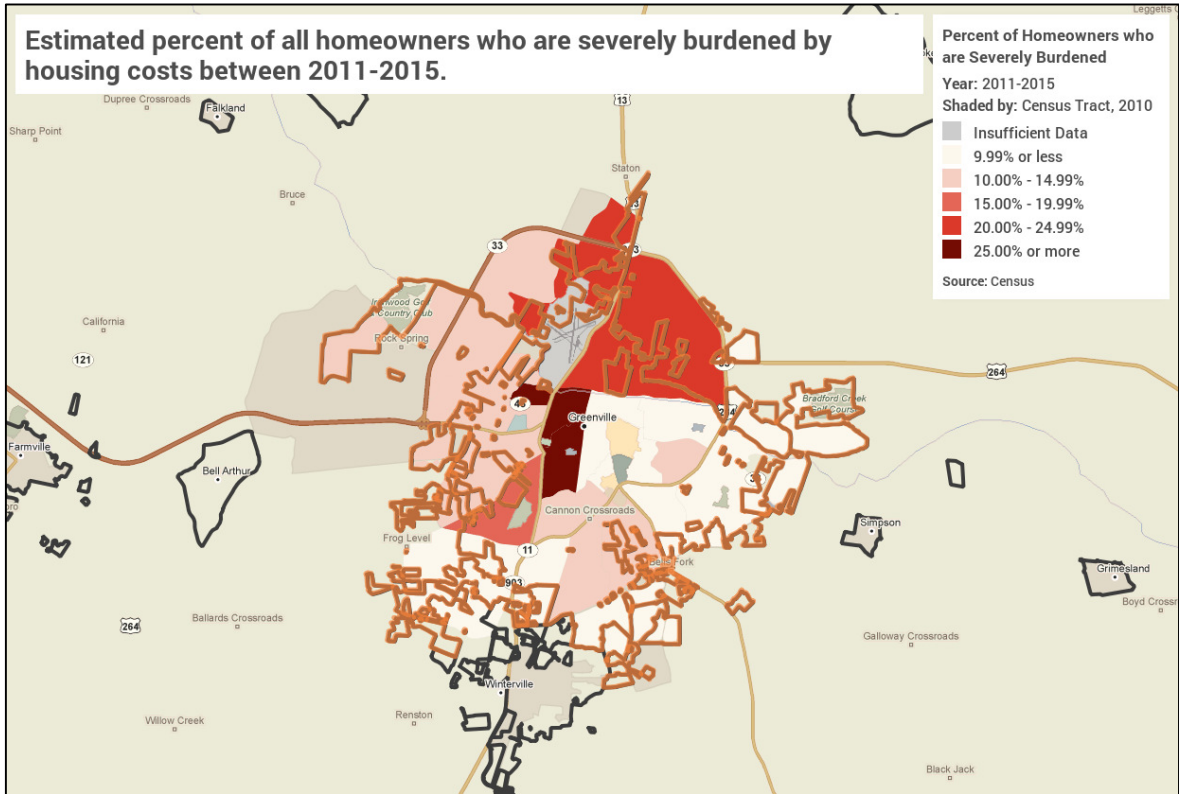
Location of Severely Cost Burdened Households

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 shows 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 over 58 percent of people living in poverty.

MAP – Severely Cost Burdened Homeowners

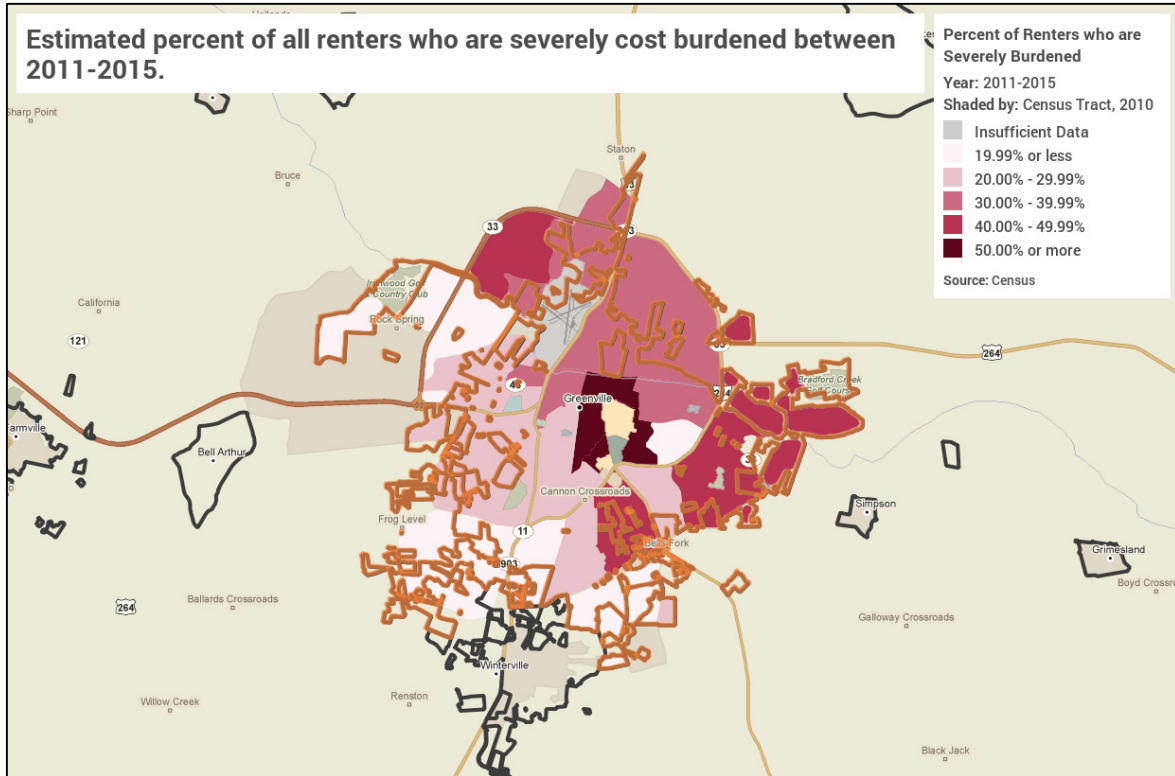


Source: 2011-2015 ACS via PolicyMap

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 Greenville Housing Authority (GHA) is the local PHA 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 PHA. Currently GHA has 714 public housing development units available to residents, including eligible persons with a disability and also offer 746 housing choice vouchers with an additional 225 families served through other federally funded programs. Staff may be contacted at (252) 329-4008 to inquire about programs and waiting lists.

GHA 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 GHA’s public housing developments.

Greenville Housing Authority, 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				

GHA public housing development units are average performing development units, 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 less 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, twelve (12) sites received inspection scores with eight being high performing, while 4 sites were average performing. 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			

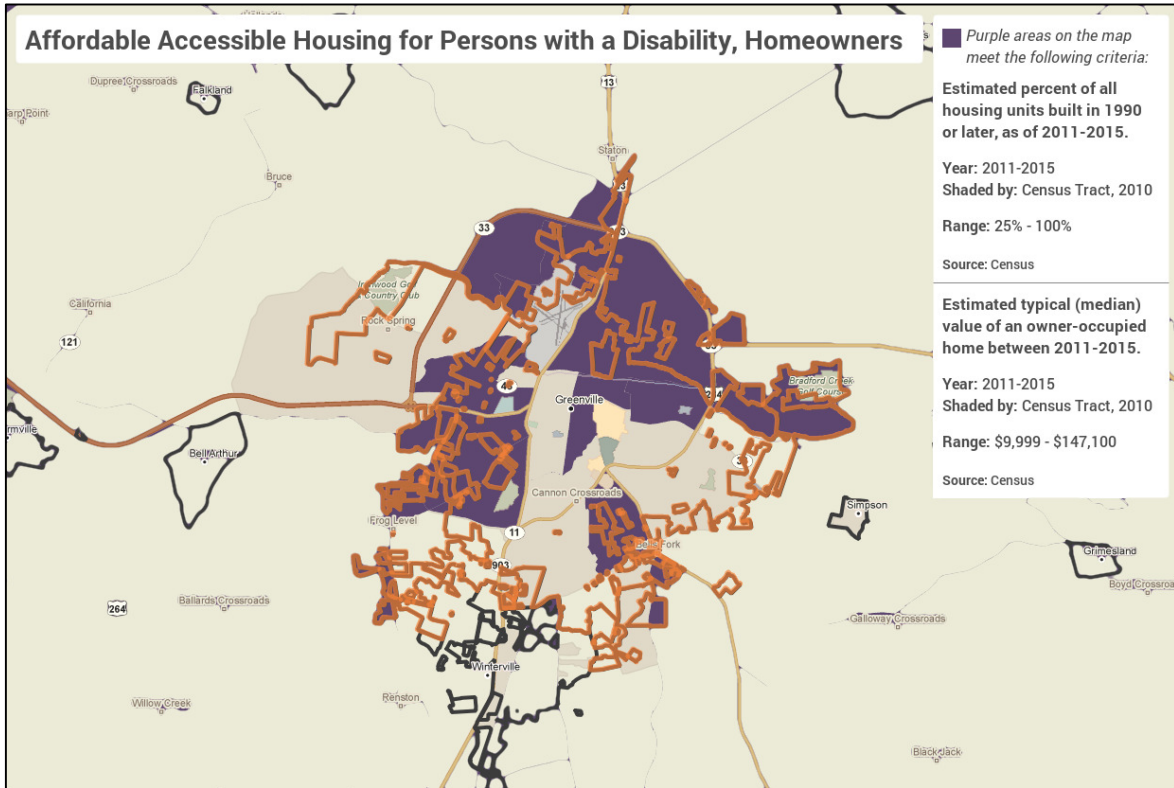
Affordable Housing and Segregation

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, just over 60 percent of the housing stock in the City was built after 1990, however this varied throughout various locations 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)

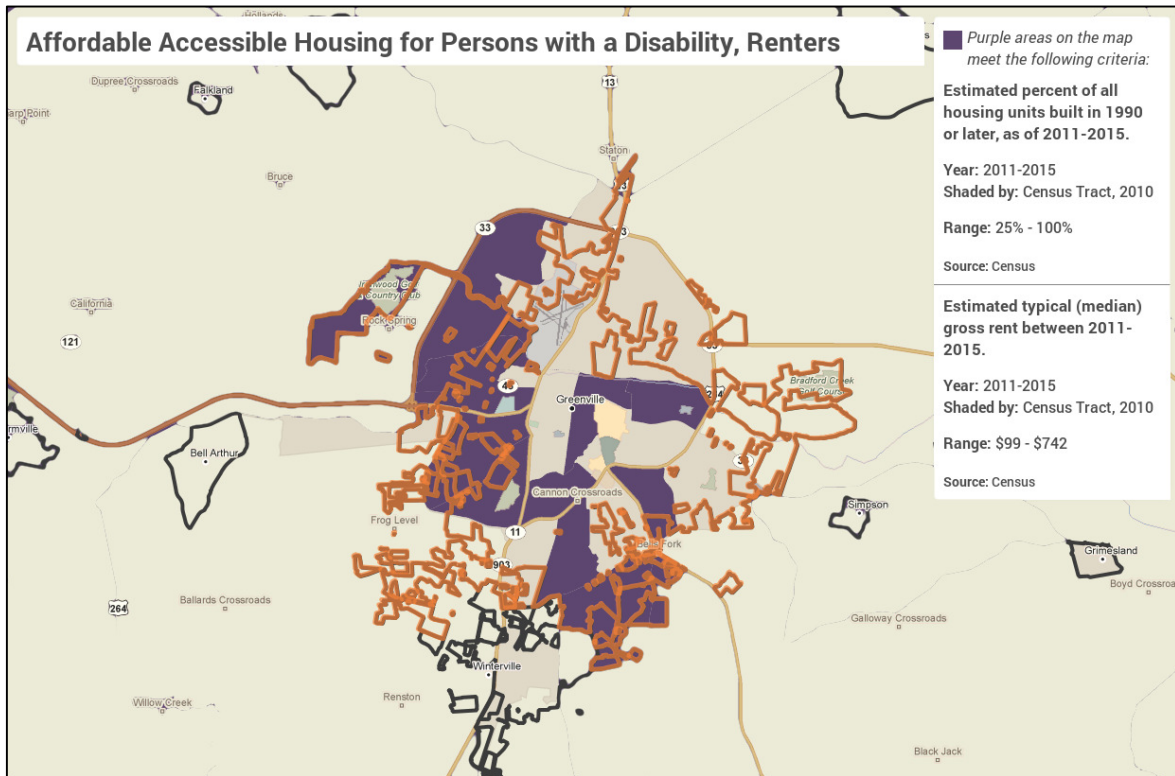
MAP – Affordable Accessible Housing for Persons with a Disability, Homeowners



Source: 2011-2015 ACS via PolicyMap

According to the map, the northern areas of Greenville are largely accessible for persons with a disability. Purple shaded 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 less homes built after 1990.

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



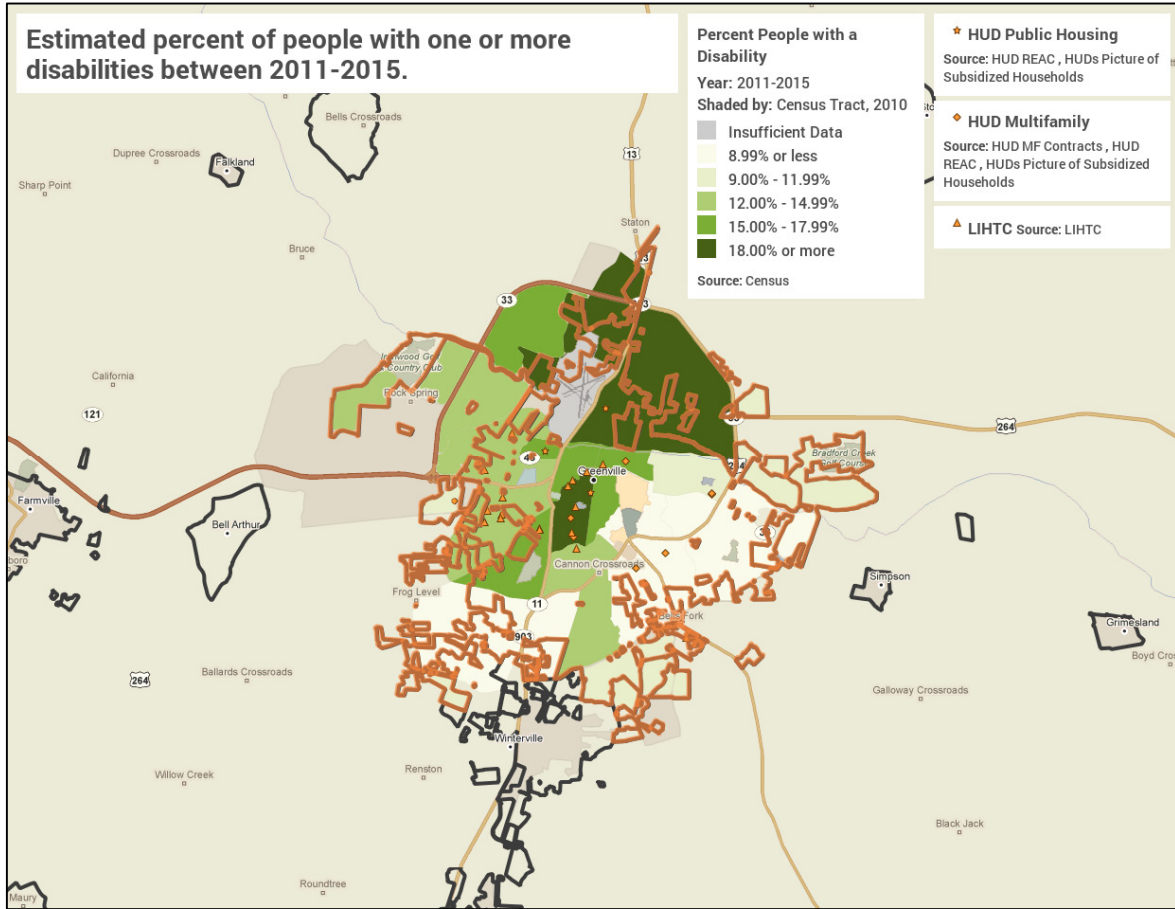
Source: 2011-2015 ACS via PolicyMap

Much of the western half of Greenville and the southeastern areas of the City have accessible housing for renters who are disabled. Purple shades 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 less 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 City, especially the GHA'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 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

Persons With Disabilities and Housing Access

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

While the City and GHA promotes and makes reasonable accommodations for all persons with a disability, GHA 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 over 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)

Integration of Persons with Disabilities Living in Institutions and Other Segregated 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.”¹ 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.²

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 Ave 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)

Affordable Housing for Persons with a Disability

Eligible persons with a disability have access to publicly supported housing in Greenville through the Greenville Housing Authority. According to the HUD provided data, there are 353 residents using public housing which have a disability.

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

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

² 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.

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

There are a number of organizations and local agencies that provide support and services for persons with disabilities. Below is a list of prominent agencies and organizations and a summary of what their services are:

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 towards decent and affordable housing for low- and moderate-income households throughout the state. Services through the coalition include resource and referrals, technical assistance, advocacy, and providing resources to the public such as 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 is 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 the UNC at Chapel Hill. It developed the NC 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) is a nonprofit organization that 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, a beach retreat, a bowling event, a water based activity events, and adaptive recreation and sports days. Social events are also planned such as pizza parties, special cooking demonstrations and a Super Bowl party.

General Issues

Segregation/Integration

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.

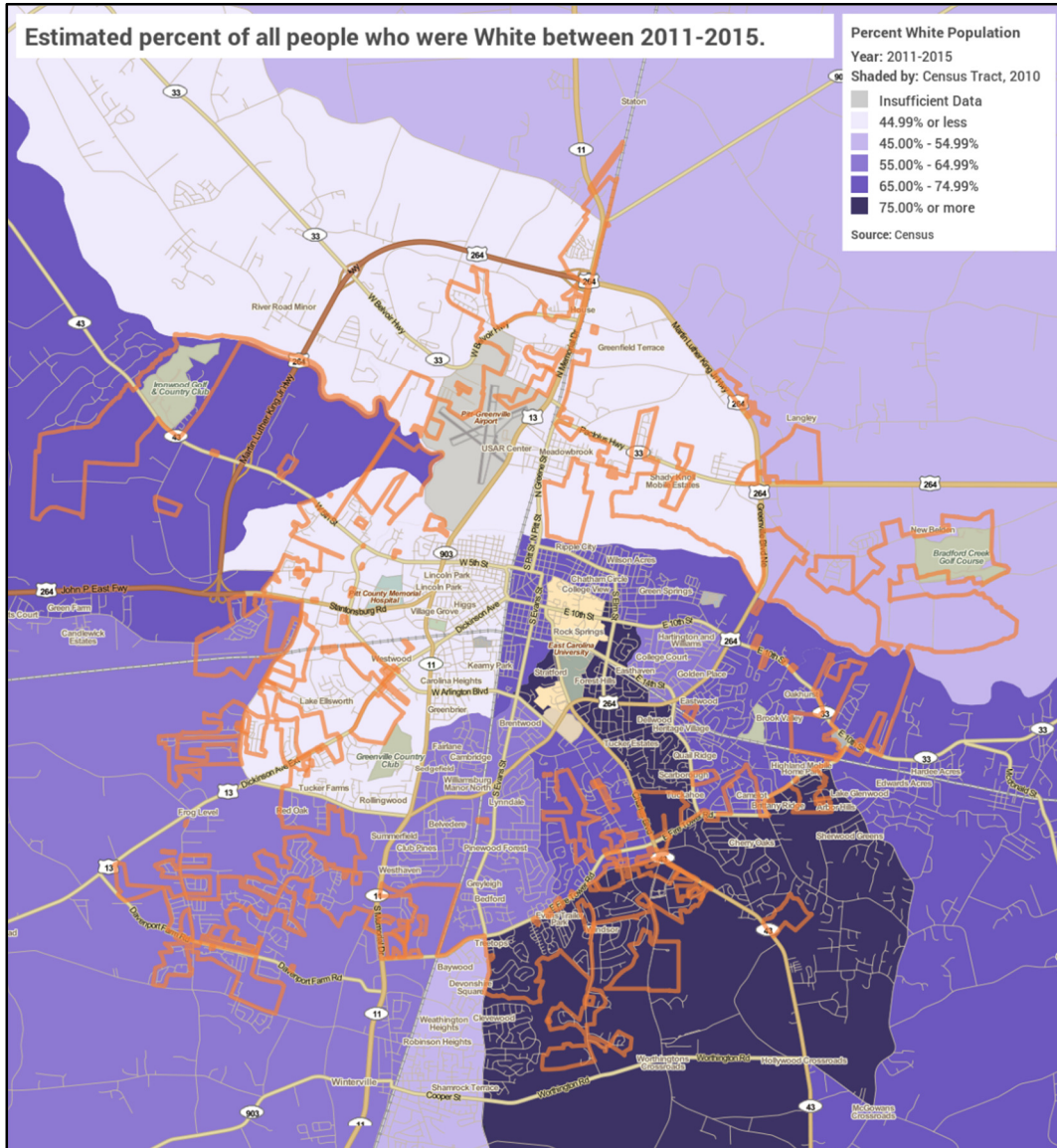
Table: Racial/Ethnic Dissimilarity Trends				
	Jurisdiction: Greenville			
	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	42.69	33.21	30.59	45.45
Black/White	44.79	35.75	33.10	49.69
Hispanic/White	22.71	30.04	30.99	33.67
Asian or Pacific Islander/White	32.75	23.79	21.43	21.68
	Region: Greenville 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				

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

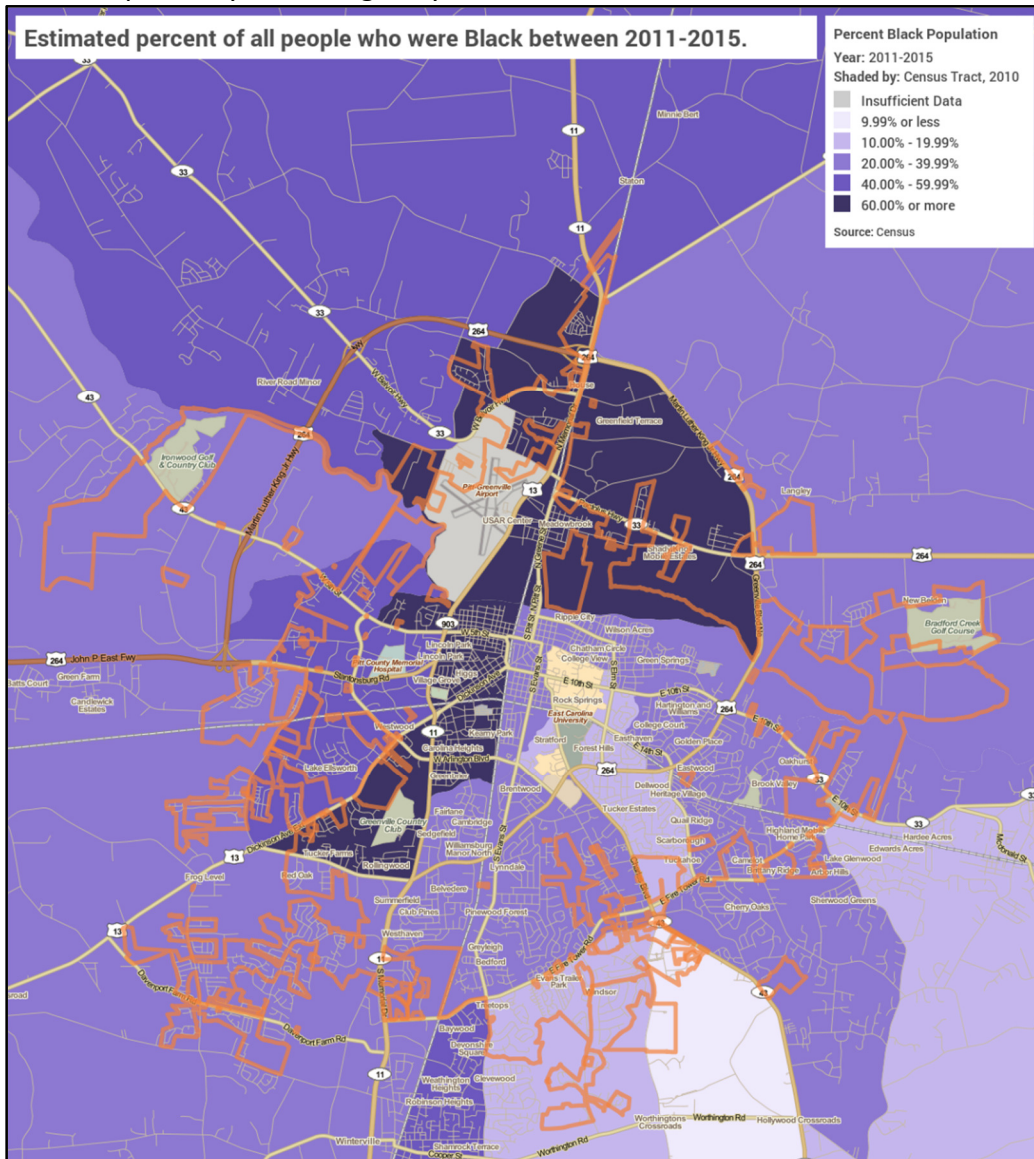
than 75 percent. The first is census tract 37147000400 and is centrally located and wraps around Eastern Carolina University primarily to the south and the east. The second census tract is 37147000301 and is located in the southcentral part of Greenville. This tract is bordered by Highway 264 to the 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

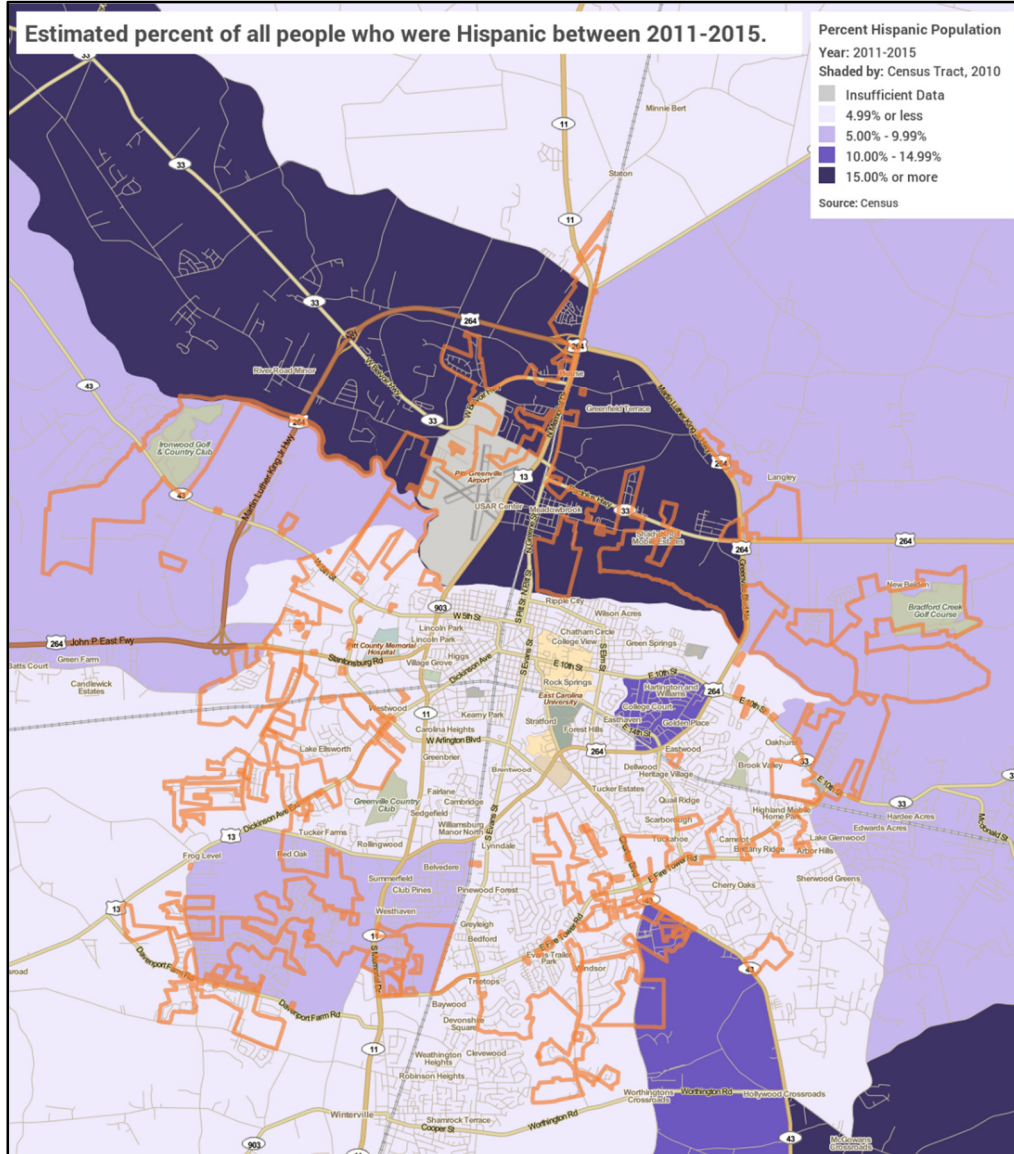
Black: Even with the sizeable population (approximately 35.65 percent) who identify as black, but there is relative segregation in the city. The CSX Rail line that runs north and south in the center of the city shows clear racial segregation. Tracts on the west side of the tracks

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 northern 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.



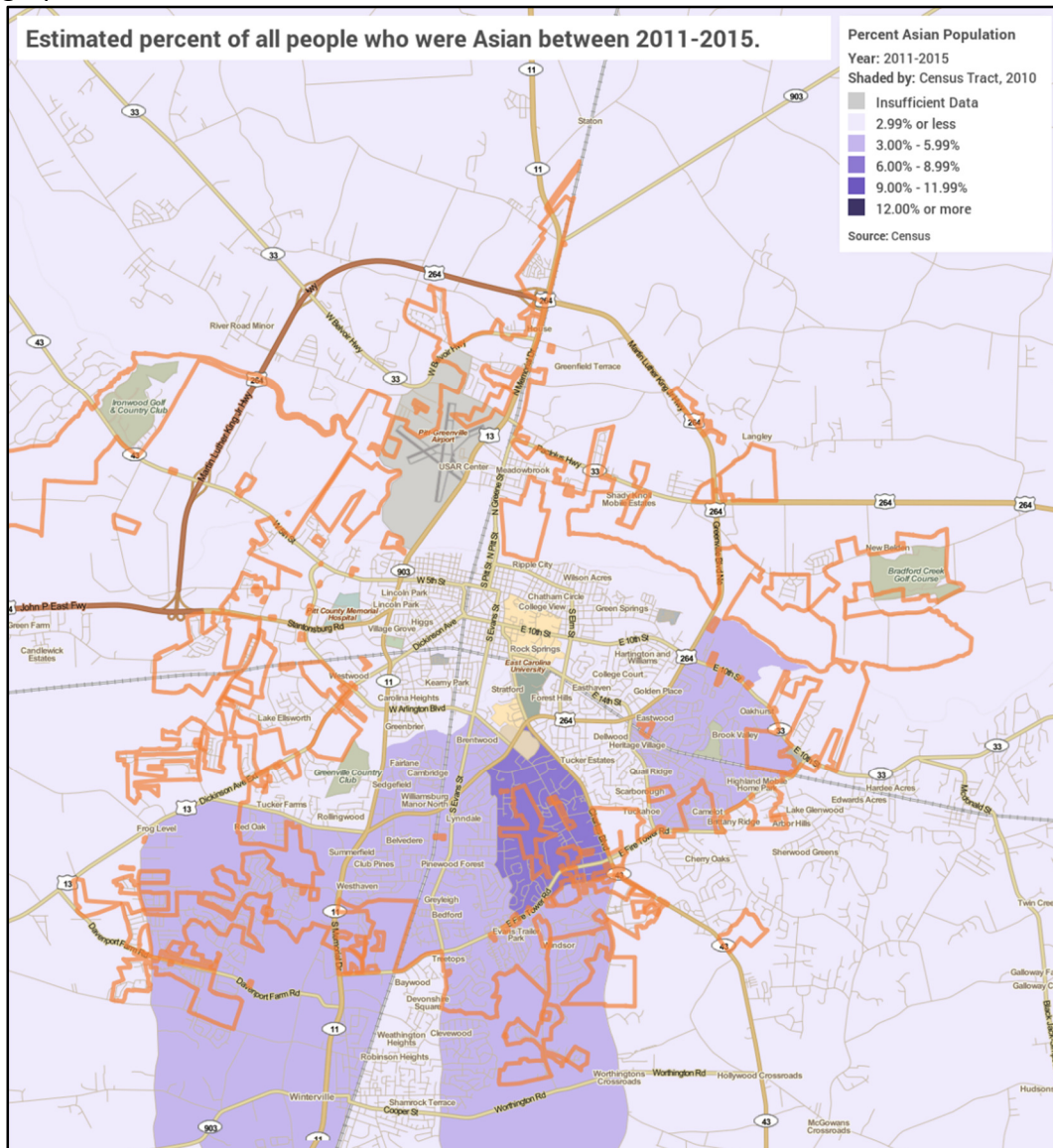
Source: 2011-2015 American Community Survey 5-Year Estimates via PolicyMap

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.



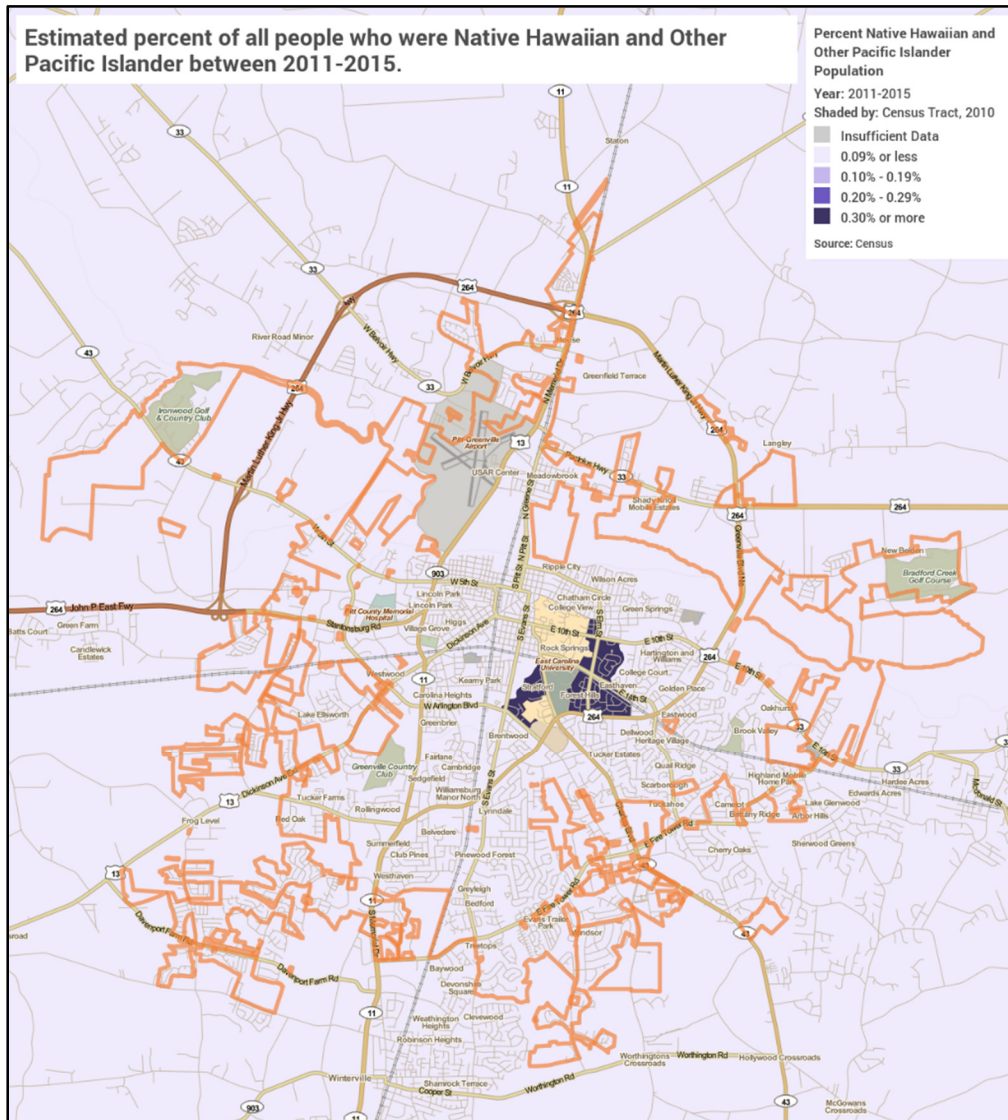
Source: 2011-2015 American Community Survey 5-Year Estimates via PolicyMap

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.



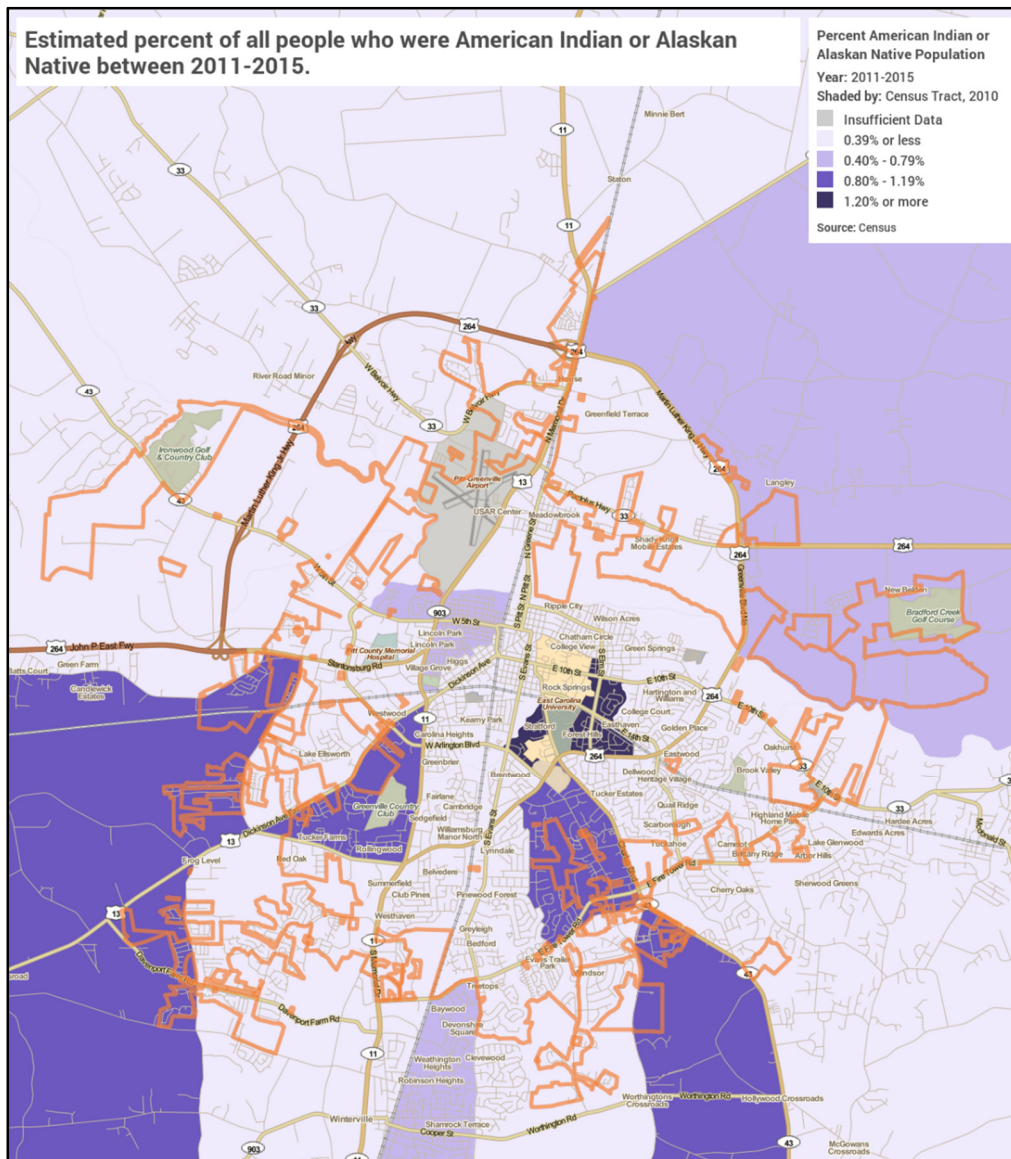
Source: American Community Survey 5-Year Estimates 2011-2015 via PolicyMap

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 Eastern Carolina University. The following map shows the distribution of Native Hawaiian or other Pacific Islanders in Greenville.



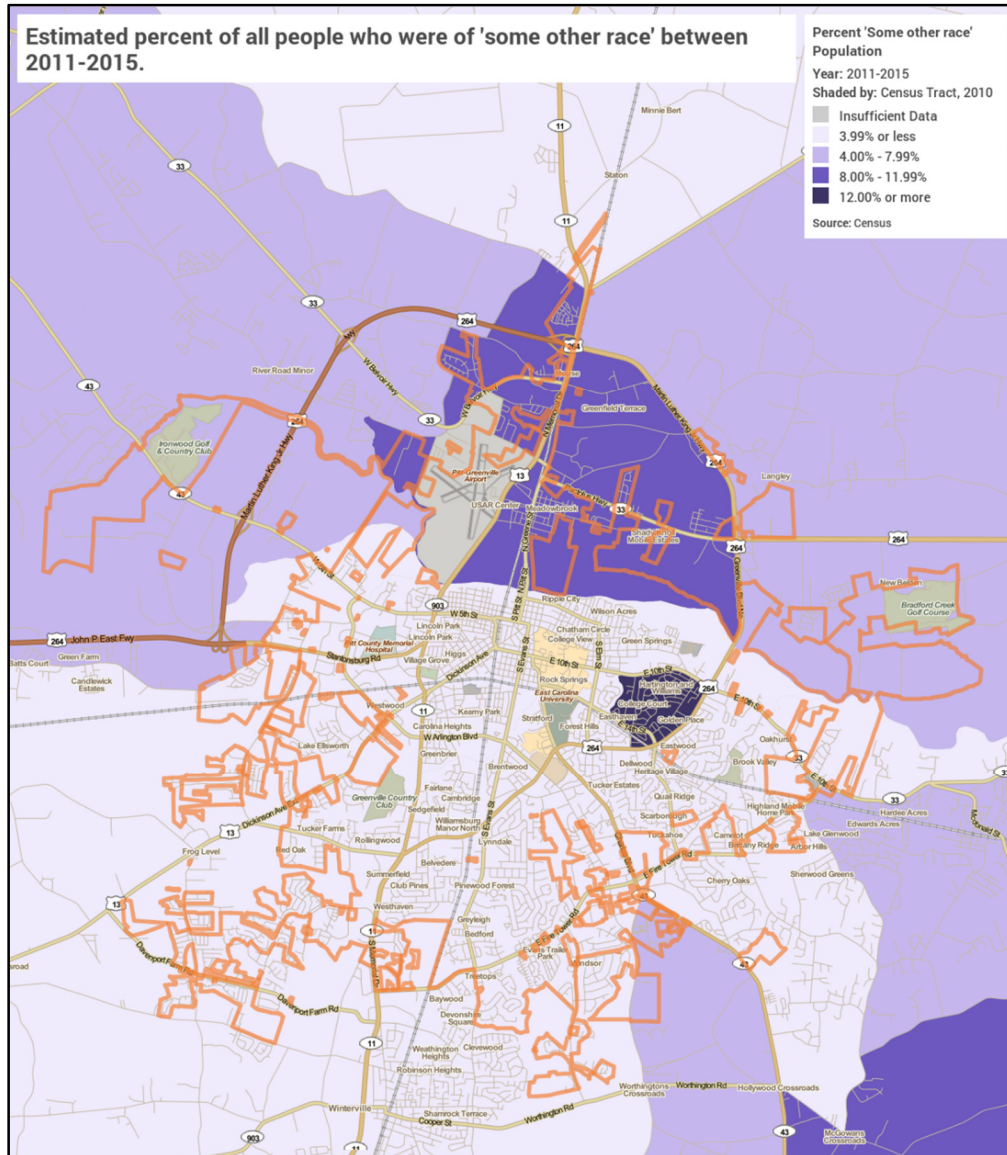
Source: 2011-2015 American Community Survey 5-Year Estimates via PolicyMap

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

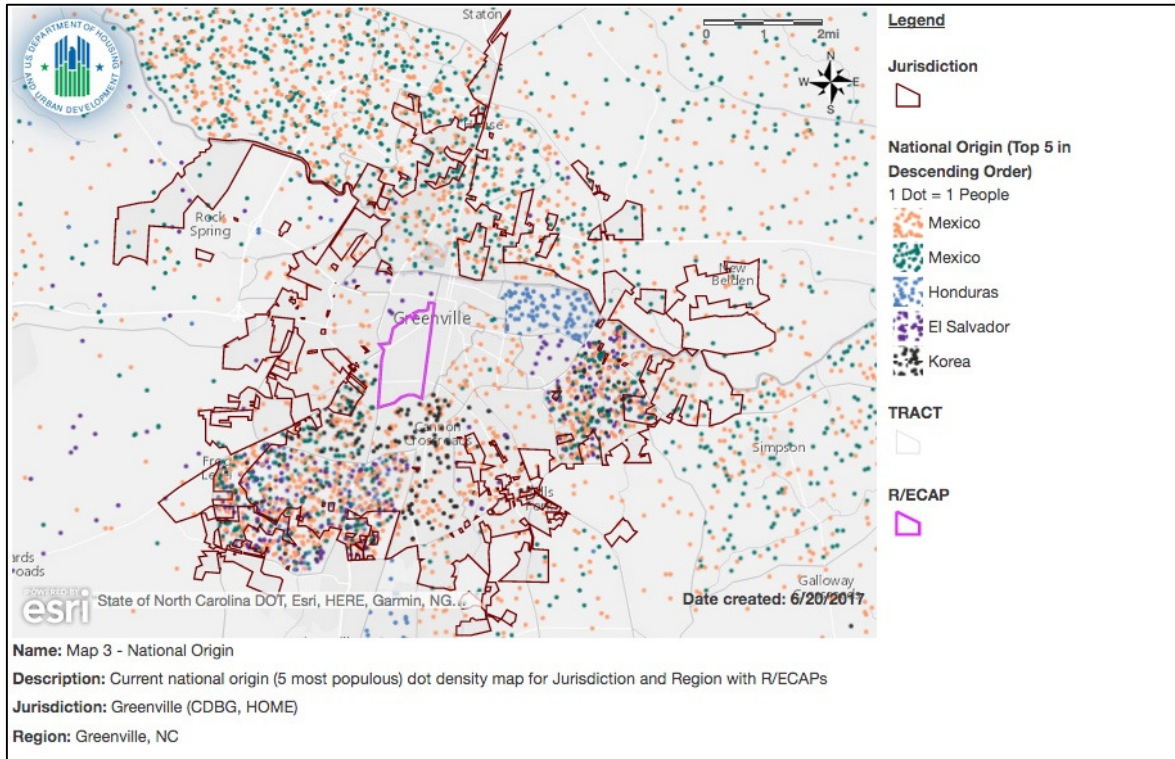
National Origin and LEP

Areas of relative segregation by national origin and LEP are intertwined. As expected, areas with a higher concentration 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

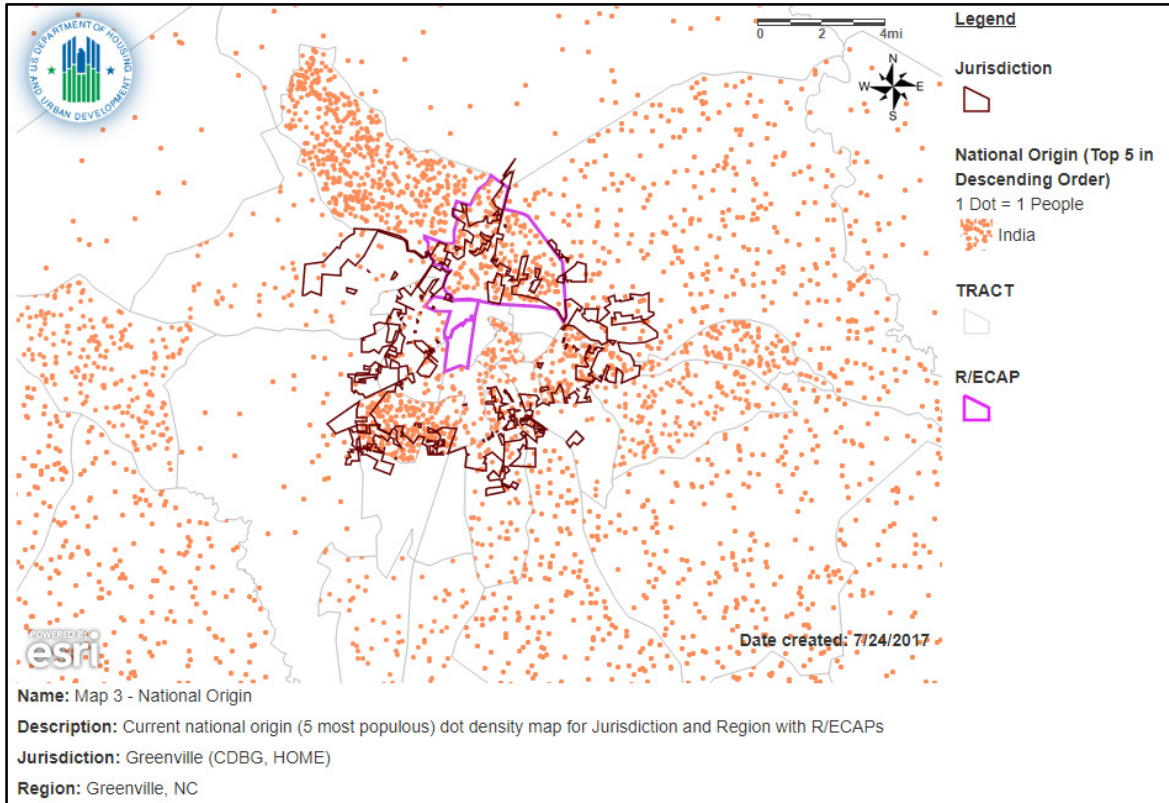


Source: HUD

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

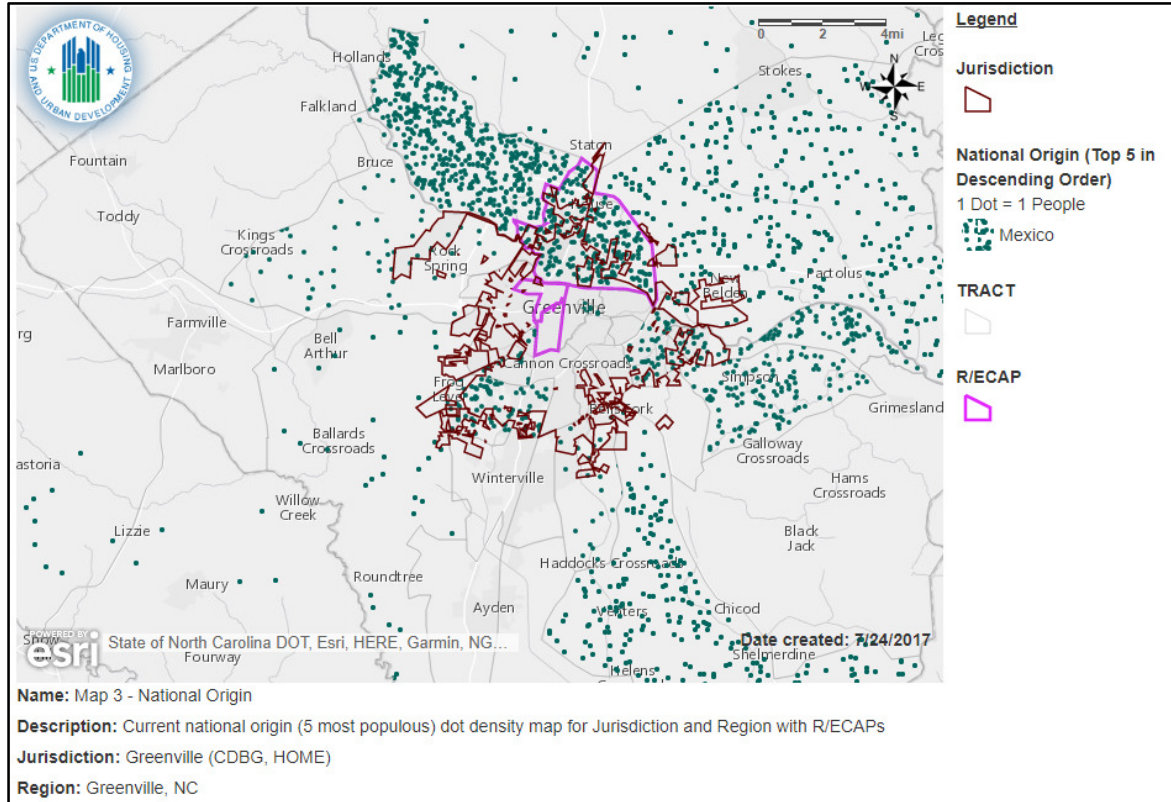


Source: HUD

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

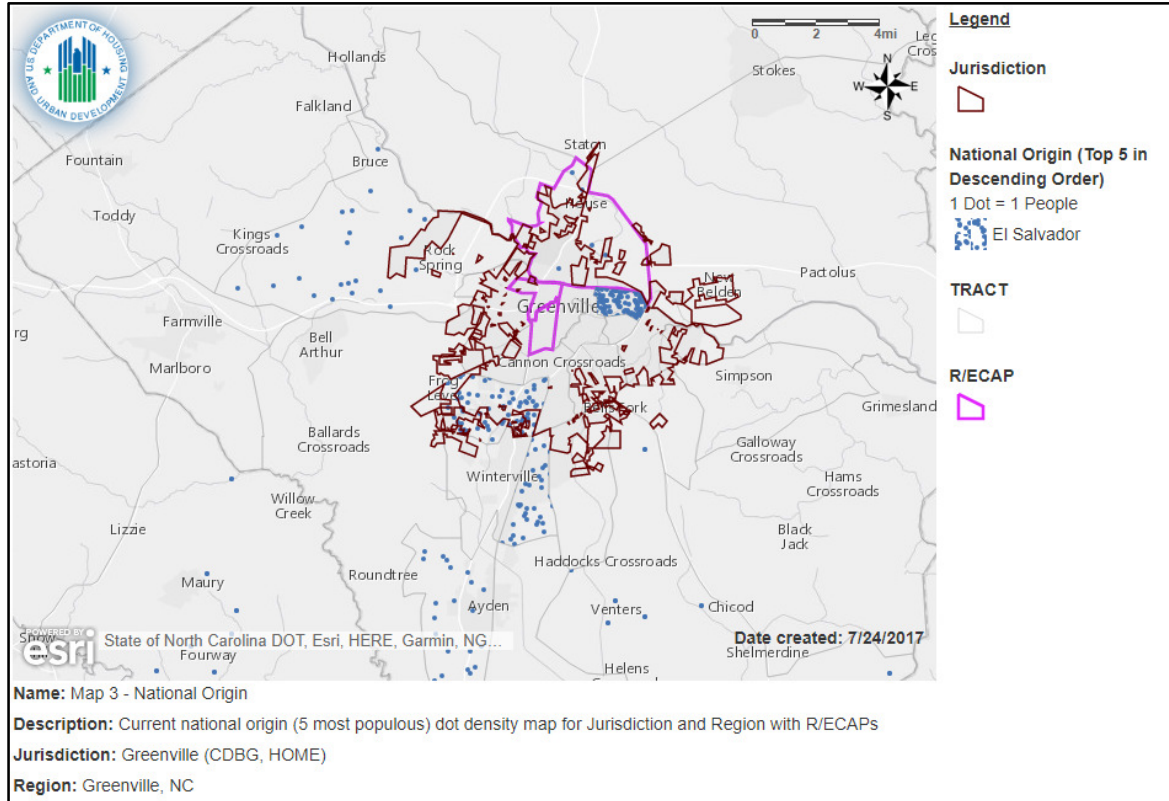


Source: HUD

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.

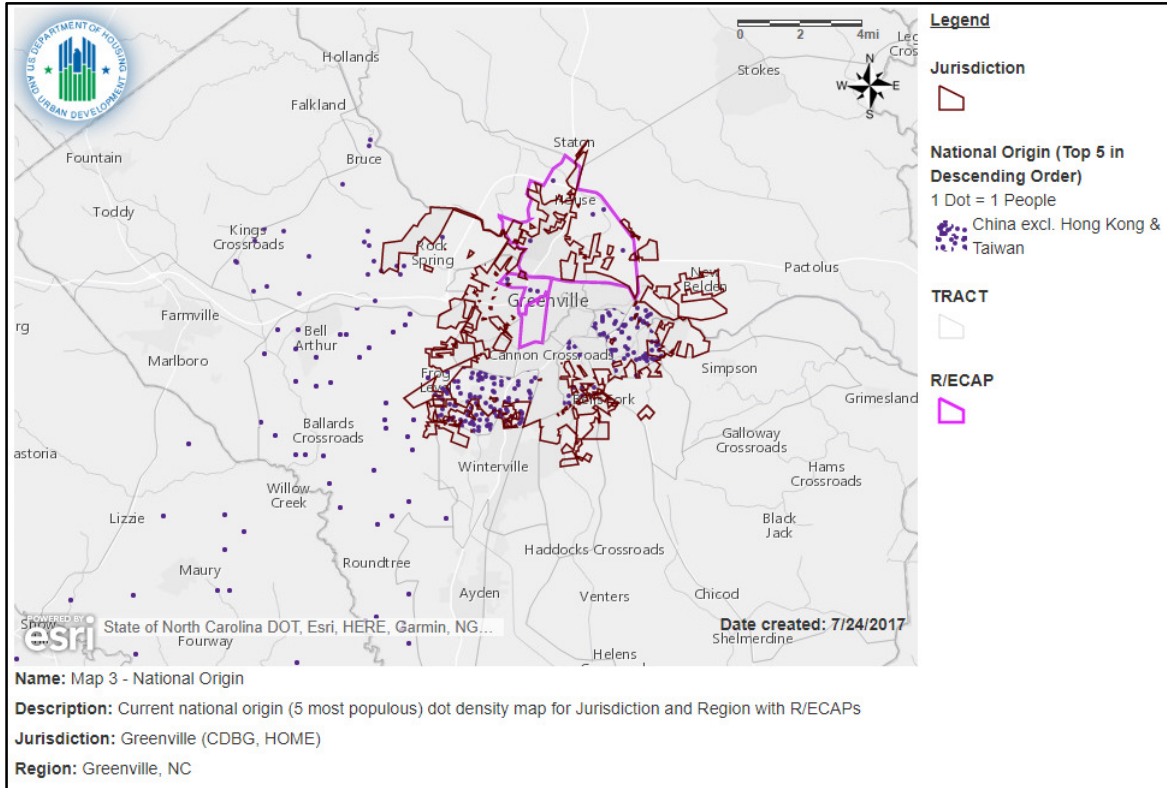
HUD Map 3 – National Origin, El Salvador



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*

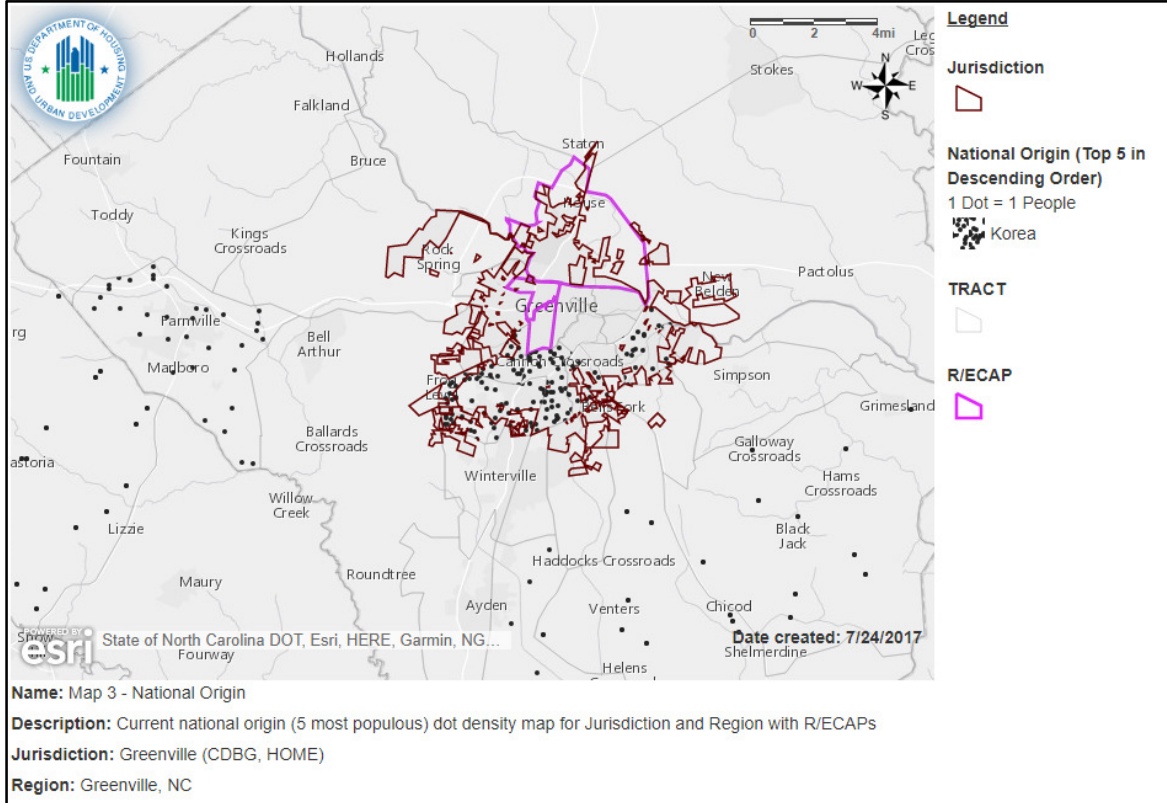


Source: HUD

National Origin – Korea

The population from Korea is primarily distributed to the east and southern parts of the city. Like many foreign-born populations the number of residents from Korea is relatively small but patterns of segregation exist.

HUD Map 3 – National Origin, Korea

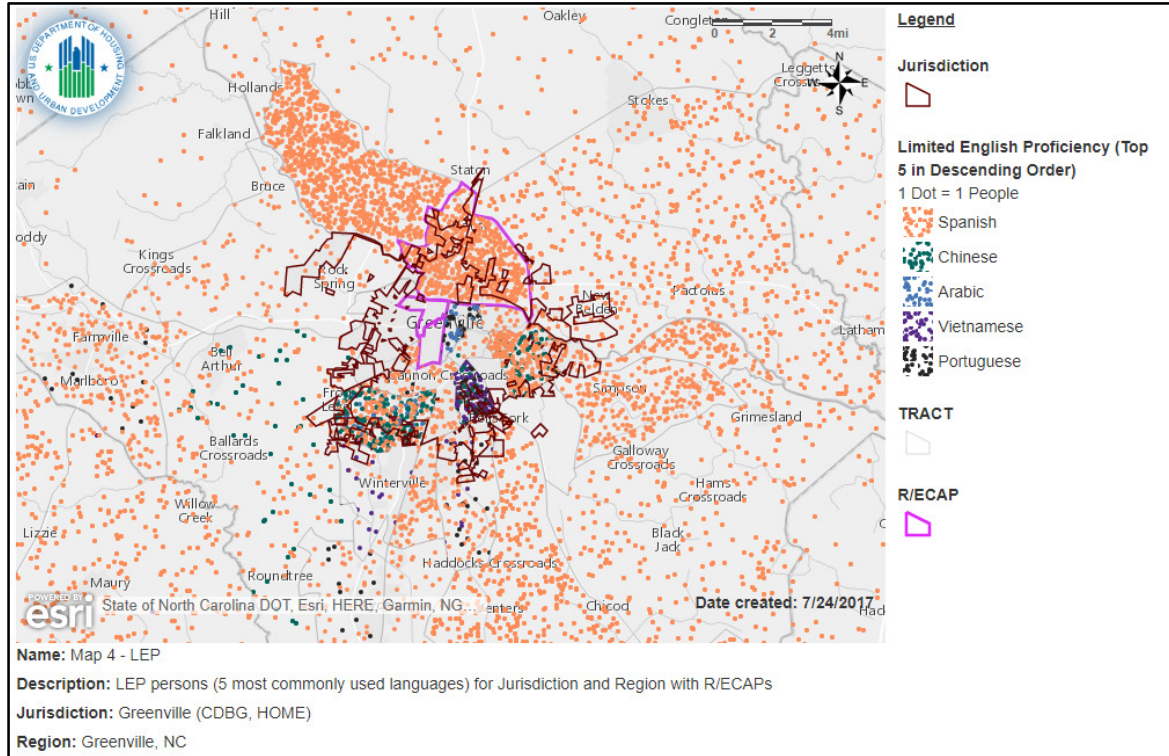


Source: HUD

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

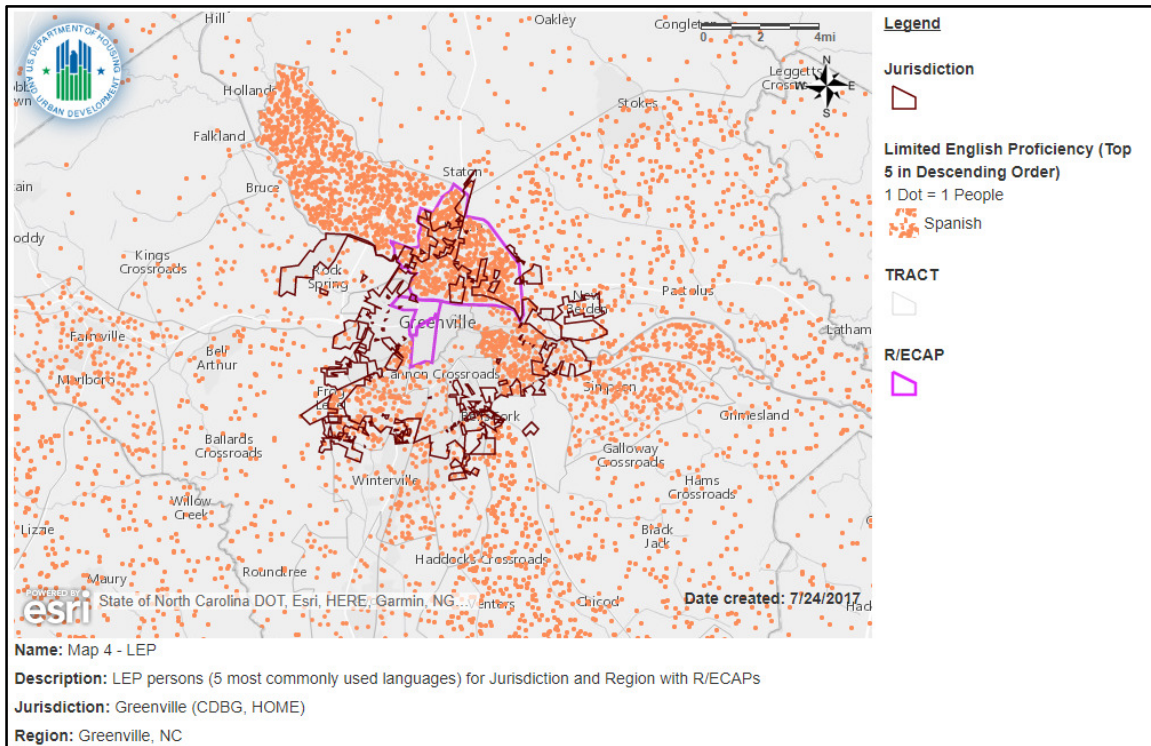


Source: HUD

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

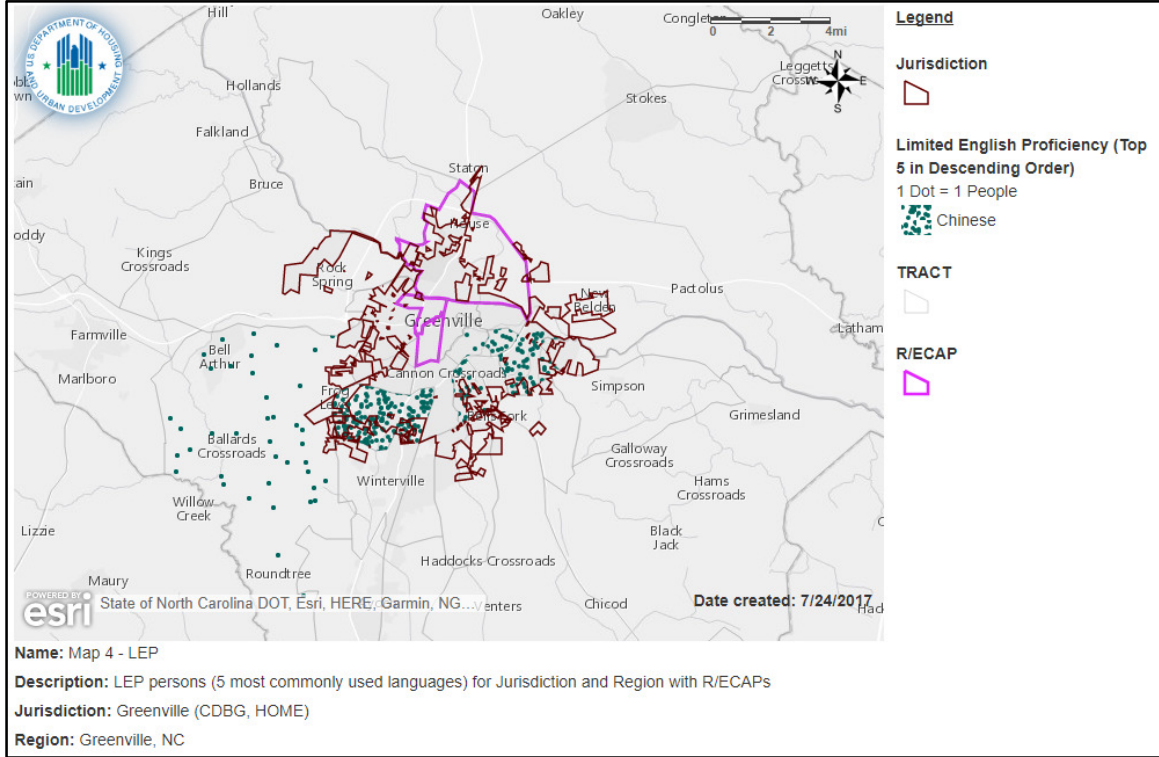


Source: HUD

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

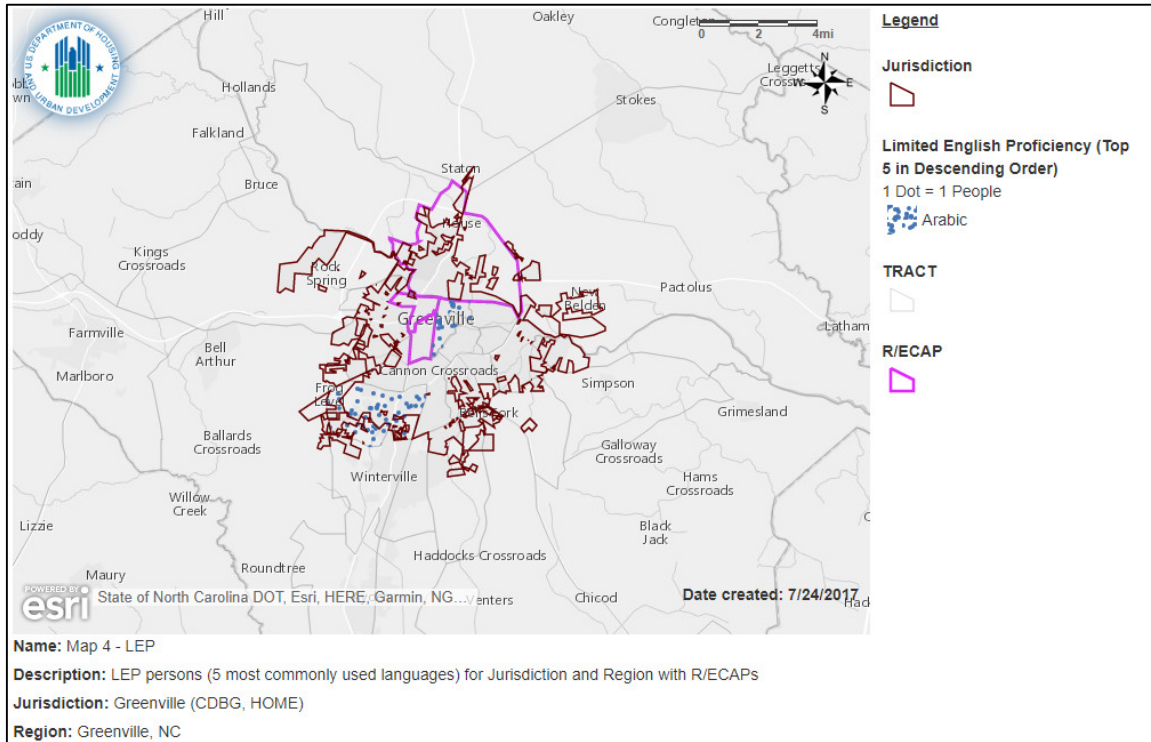


Source: HUD

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

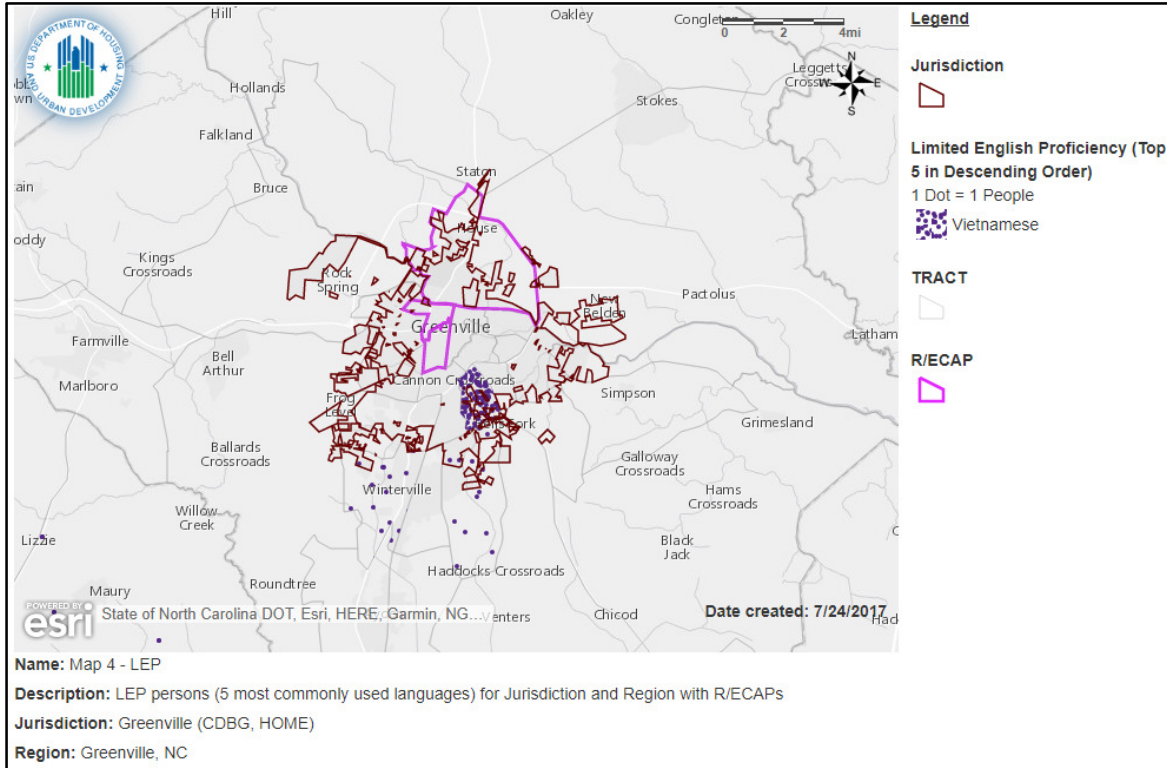


Source: HUD

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

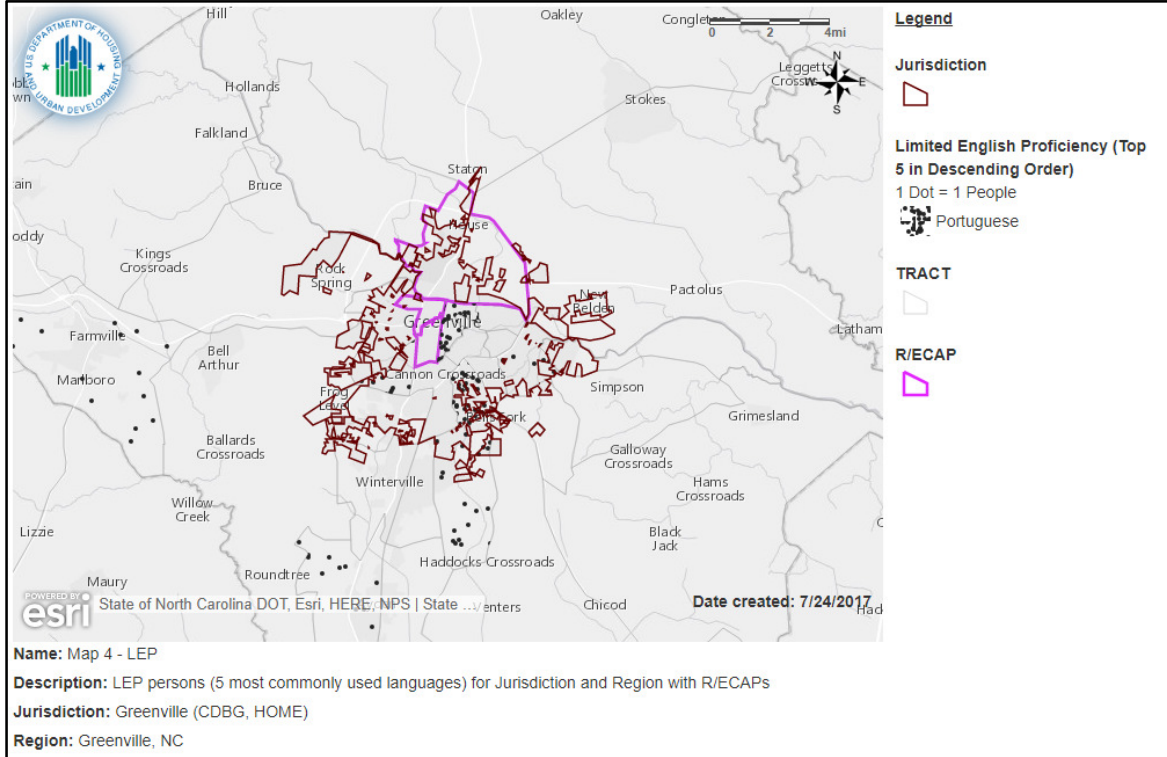


Source: HUD

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

Change in Segregation Over Time

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.

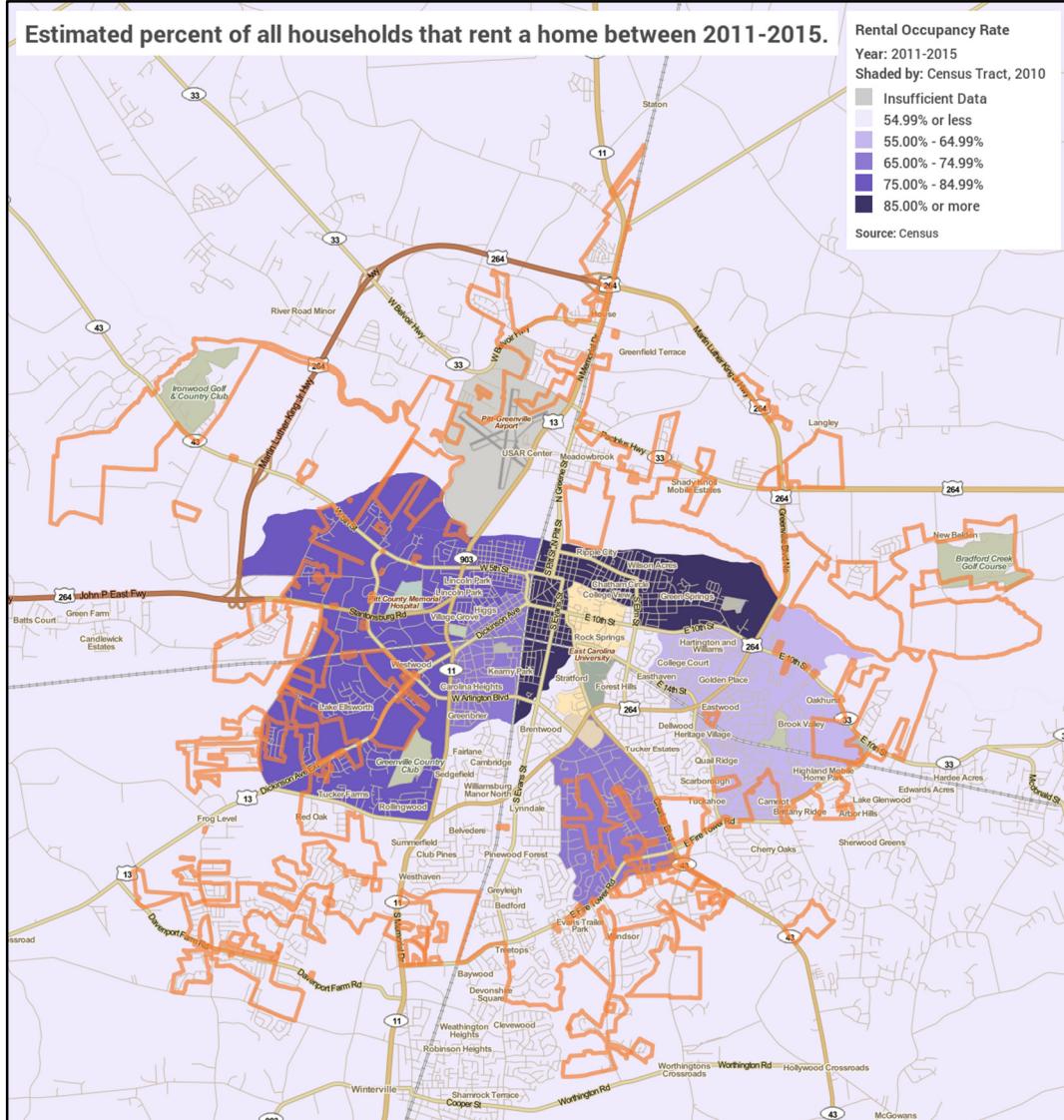
Housing Tenure and Segregation

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%

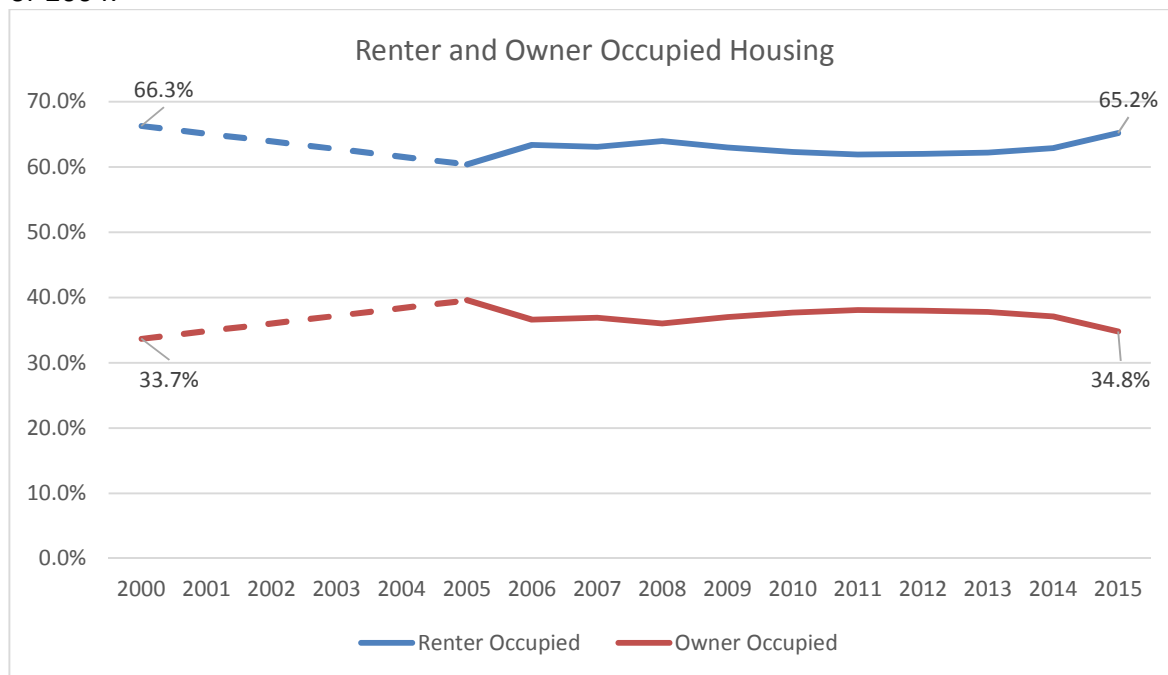
Source: 2011-2015 American Community Survey 5-Year Estimates

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 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						

Policies Affecting Segregation Trends

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.

Additional Information:

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.

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 in privately owned housing units.

Contributing Factors of 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 costs 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 the gross rent, housing costs for home owners, and the rate of cost-burdened residents. In addition, the median household income has increased but not as quickly as costs, 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			

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

According to HUD, a racially/ethnically-concentrated area of poverty (R/ECAP) definition:

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% or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower

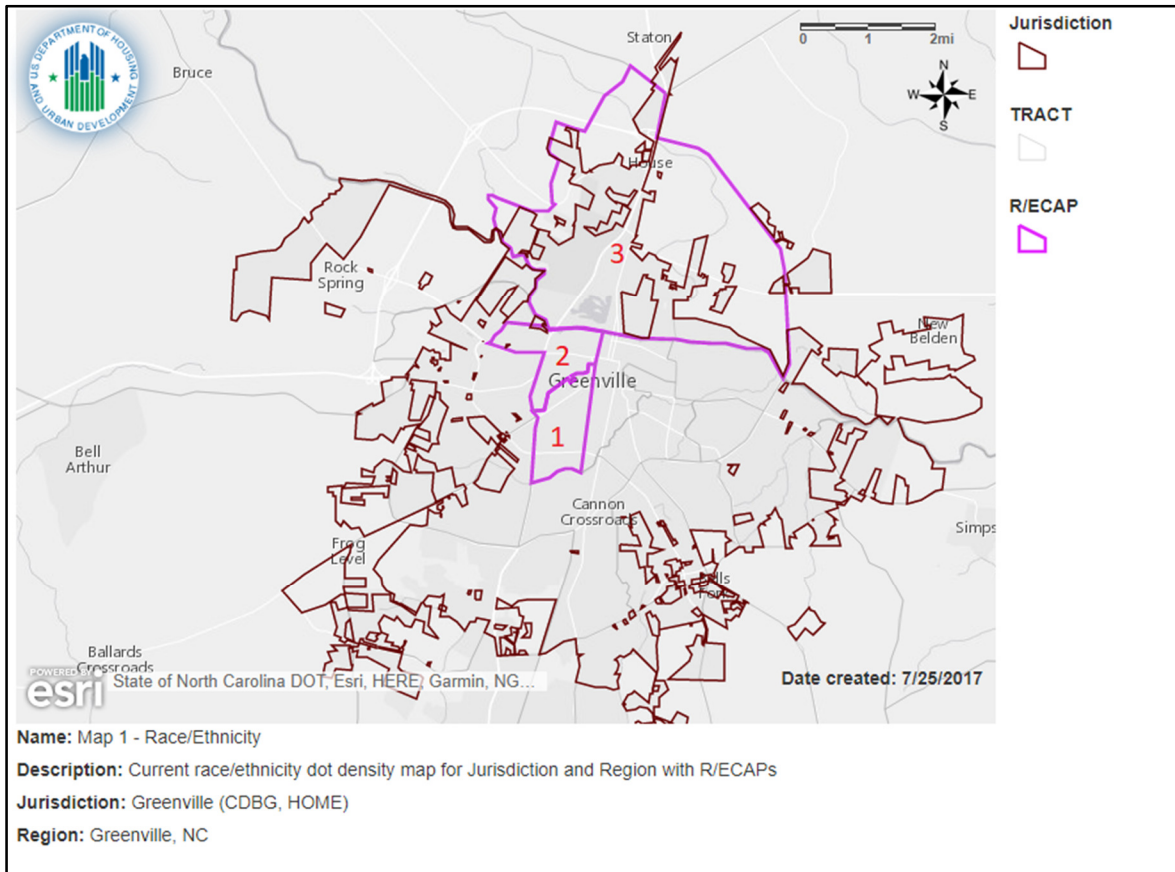
Based on the AFFH Mapping Tool, there are three R/ECAP tracts in the jurisdiction.

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 a 7 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

R/ECAP Demographics

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. Over 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 ten largest national origins for the city: Venezuela, Spain, and Peru.

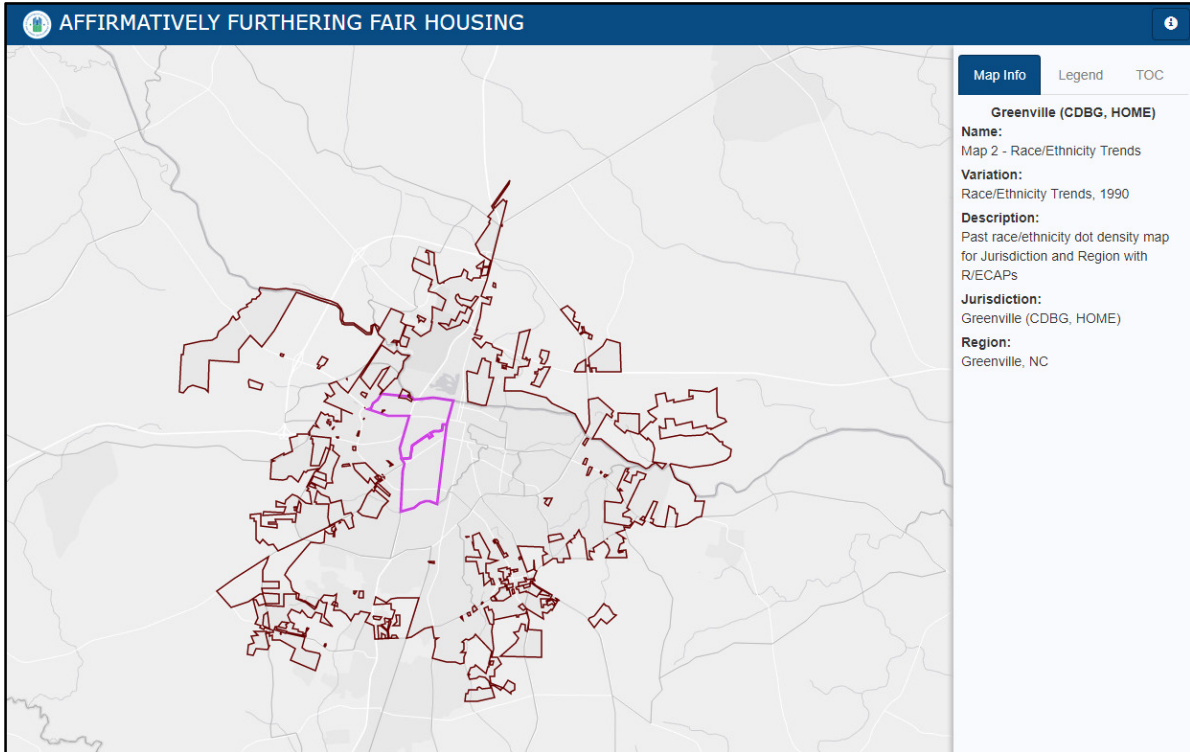
TABLE: Demographic Comparison Between R/ECAP Tract and Jurisdiction			
Race/Ethnicity	R/ECAP	Greenville	Percent Difference
White, Non-Hispanic	11.81%	55.85%	44.04%
Black, Non-Hispanic	80.43%	36.65%	-43.78%
Hispanic	5.46%	4.02%	-1.44%
Asian or Pacific Islander, Non-Hispanic	0.73%	2.25%	1.52%
Native American, 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				

R/ECAP Demographic Trends

According to the HUD provided maps, there has been some shift 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.

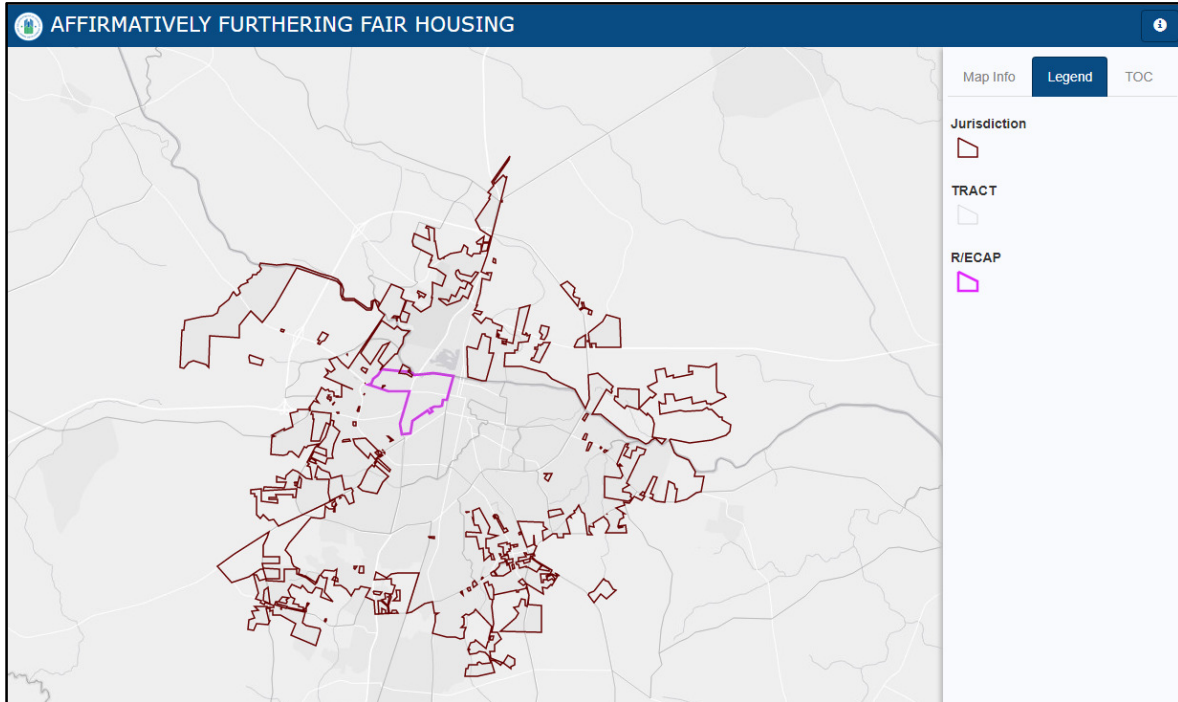
MAP: R/ECAP Tracts, 1990



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

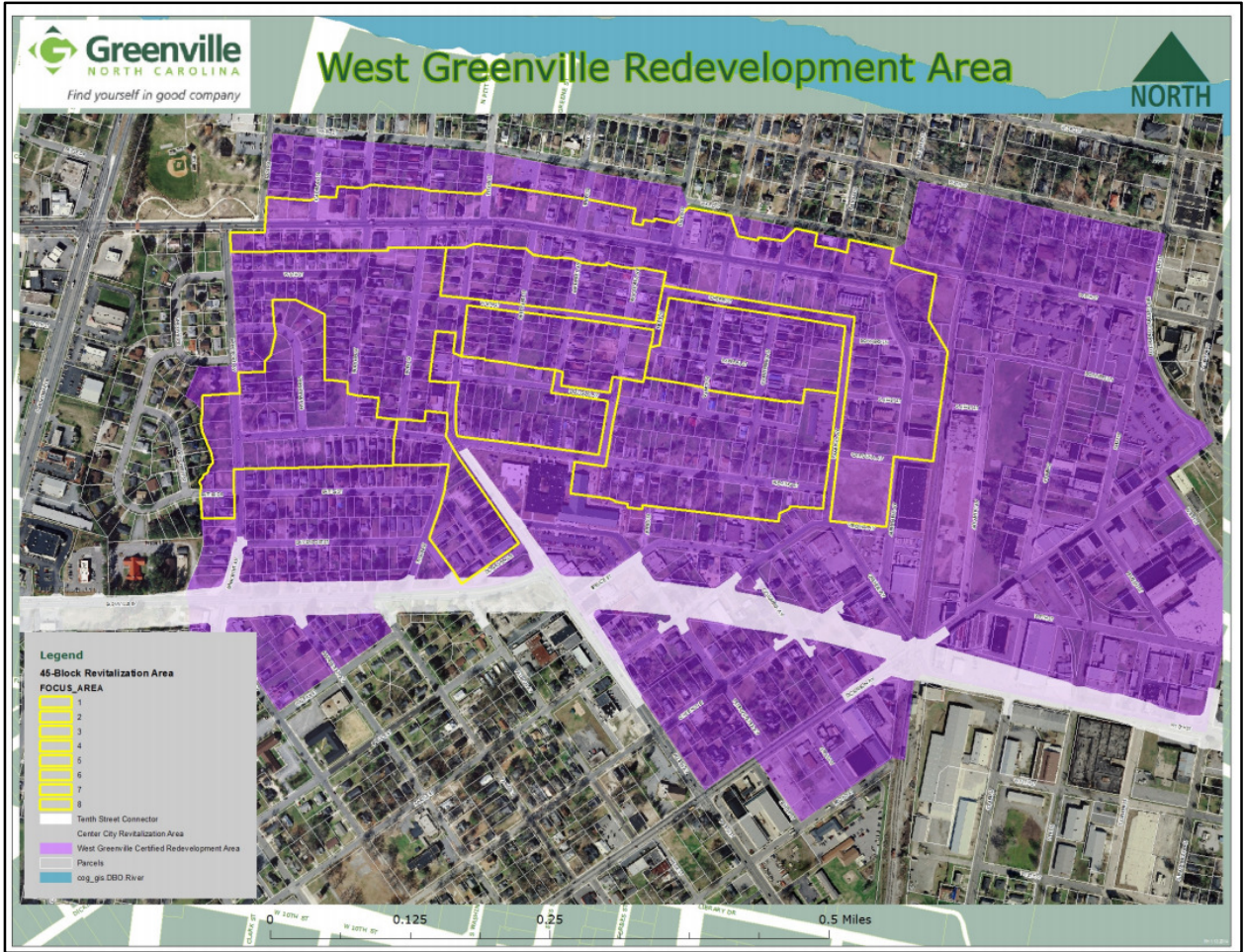


Source: HUD

Additional Information

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

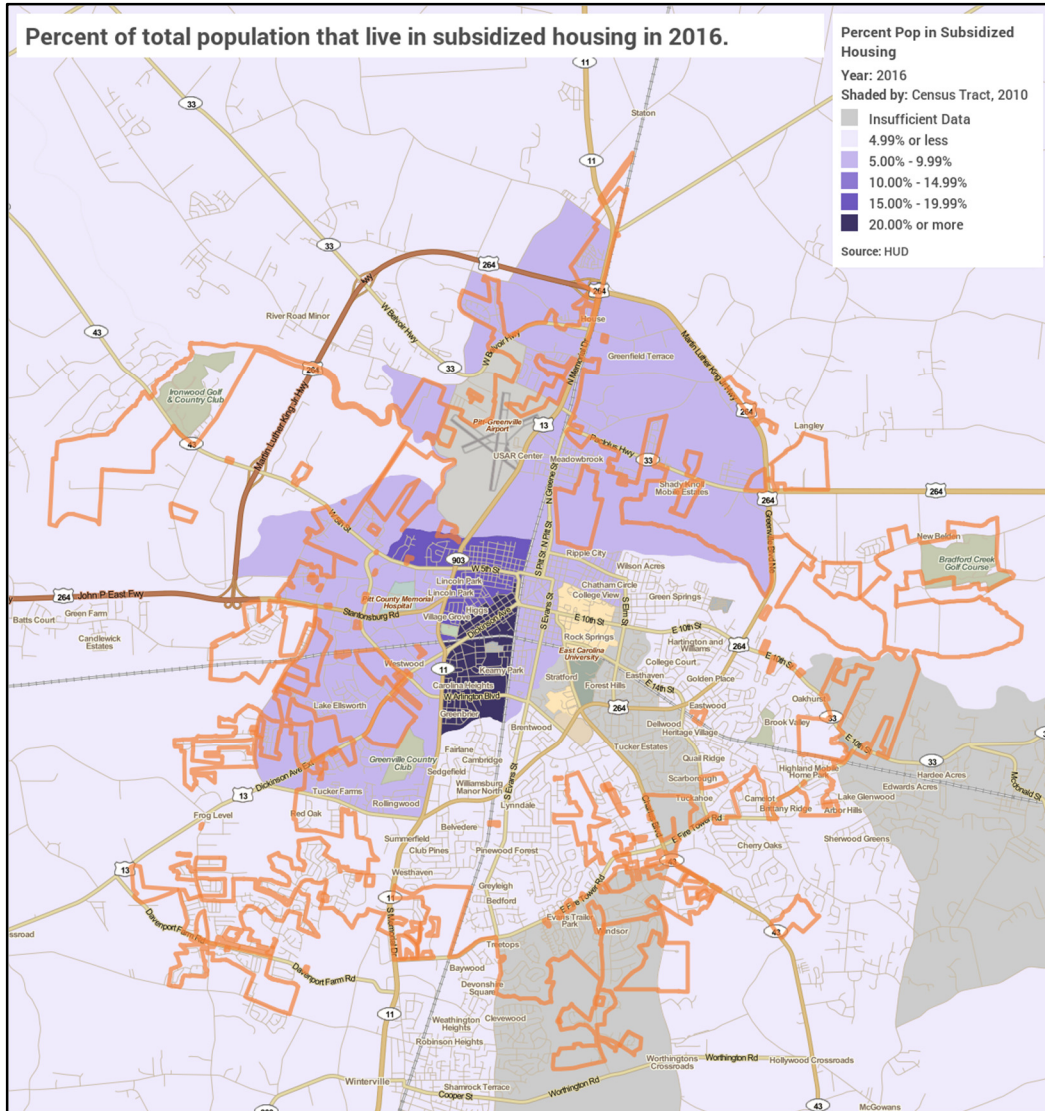
Contributing Factors of R/ECAPs

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 costs 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 incredibly high rate of subsidized housing. In 2015, over 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.

MAP: Percent Living in Subsidized Housing



Source: American Community Survey via PolicyMap

Disparities in Access to Opportunity

In order to determine disparities in access to opportunity HUD has provided a number of 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 displays the HUD provided indices for the jurisdiction and region for the total population and the populations below the poverty level.

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

Education

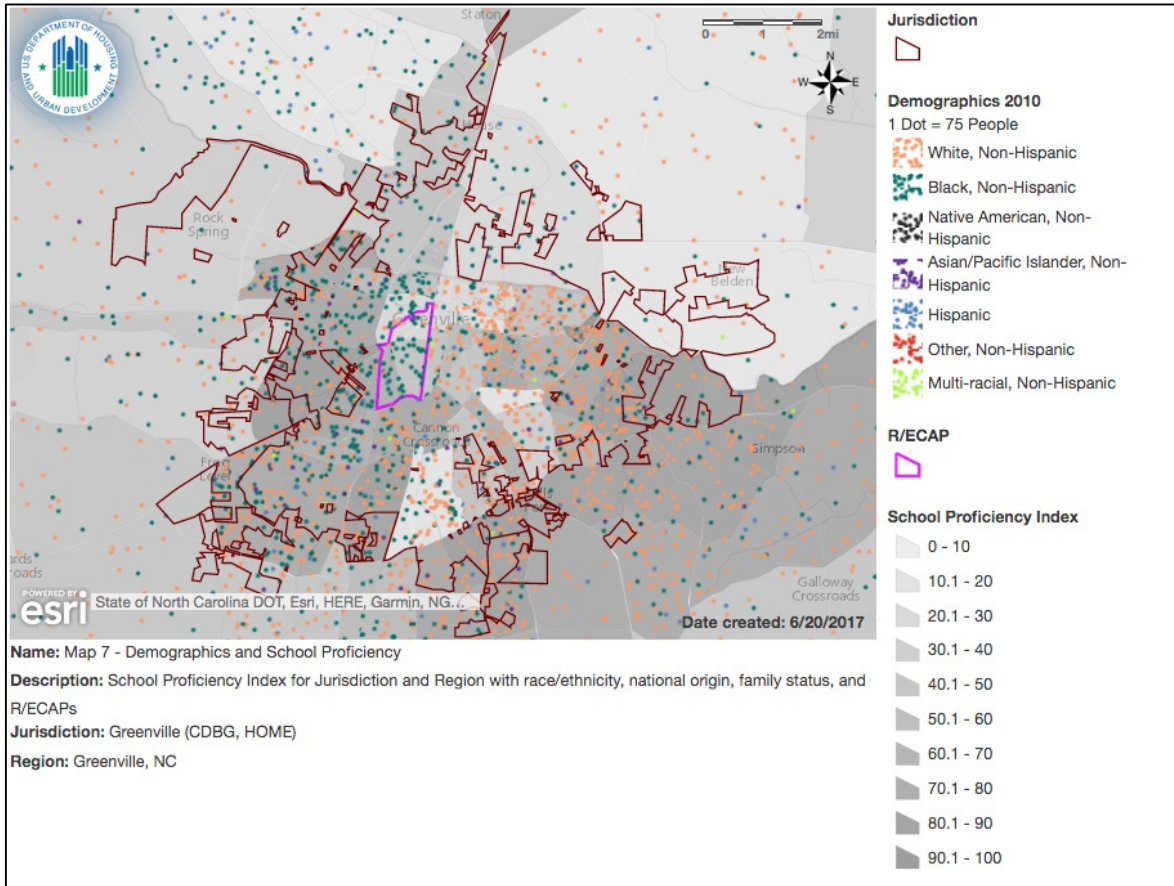
The School Proficiency Index measures the proficiency of elementary schools and is determined by the performance of 4th graders on state exams. Index scores are 1-100, with a higher score meaning a higher ranked school system as compared to a lower score meaning a lower ranked school system.

Overall, within Greenville, the school proficiency index is very 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 with 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

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.

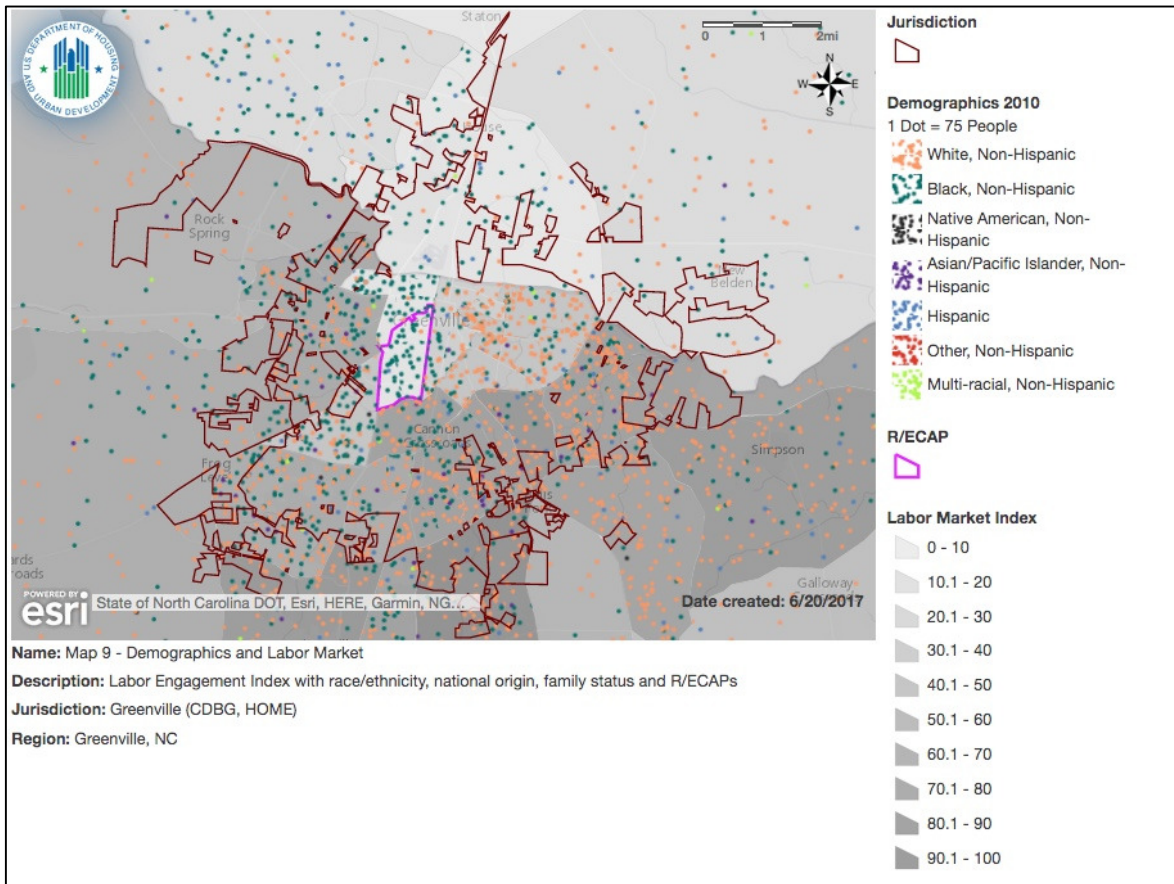
According to the Greenville Analysis of Impediments research was completed on the location of rental properties in the jurisdiction. The research found that most listings included inclusive descriptions that highlighted close proximities to schools. It is incredibly important that rental housing have access to proficient schools because a 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.

Employment

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 (over 25 years old) with a Bachelor's degree. The Job Proximity Index measures the physical distance between where someone lives and their 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.

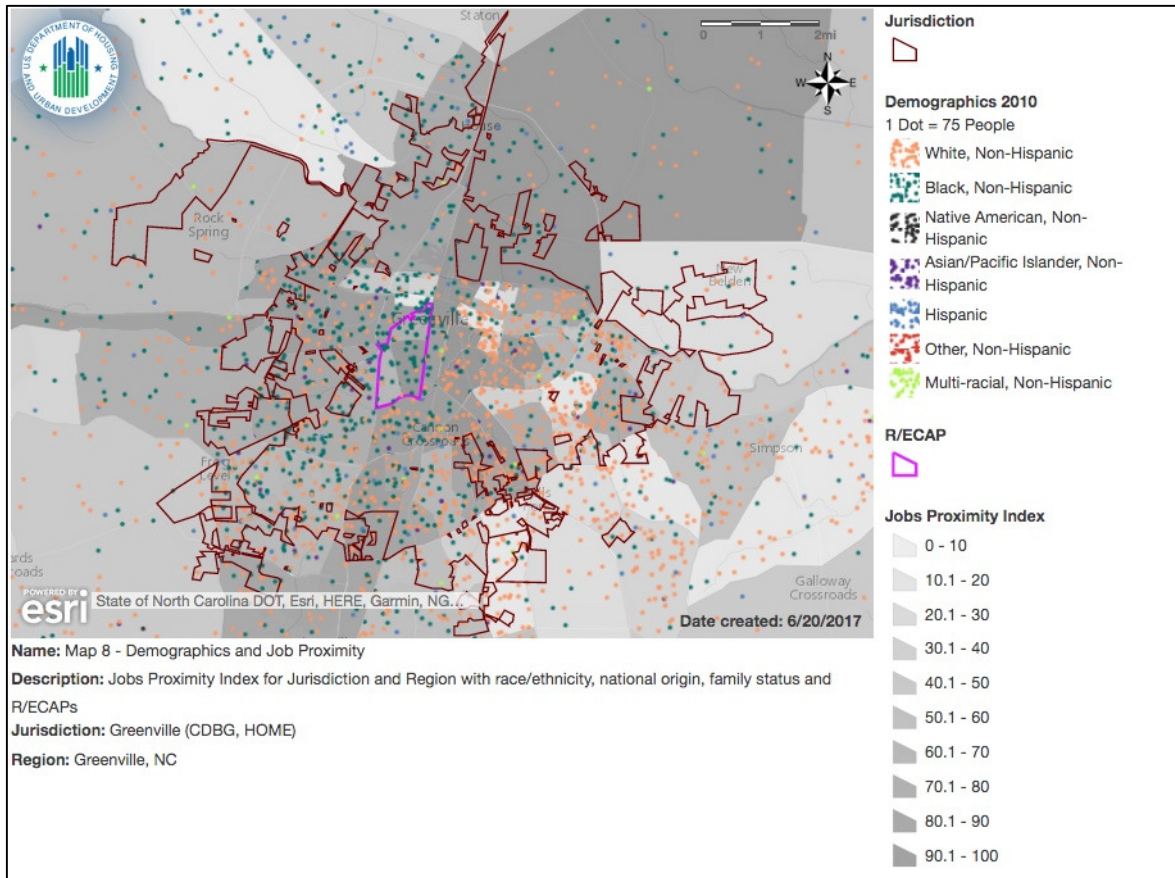
HUD Map 9 – Demographics and Labor Market



Source: HUD

The Jobs Proximity Index in the City is very 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

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.

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.

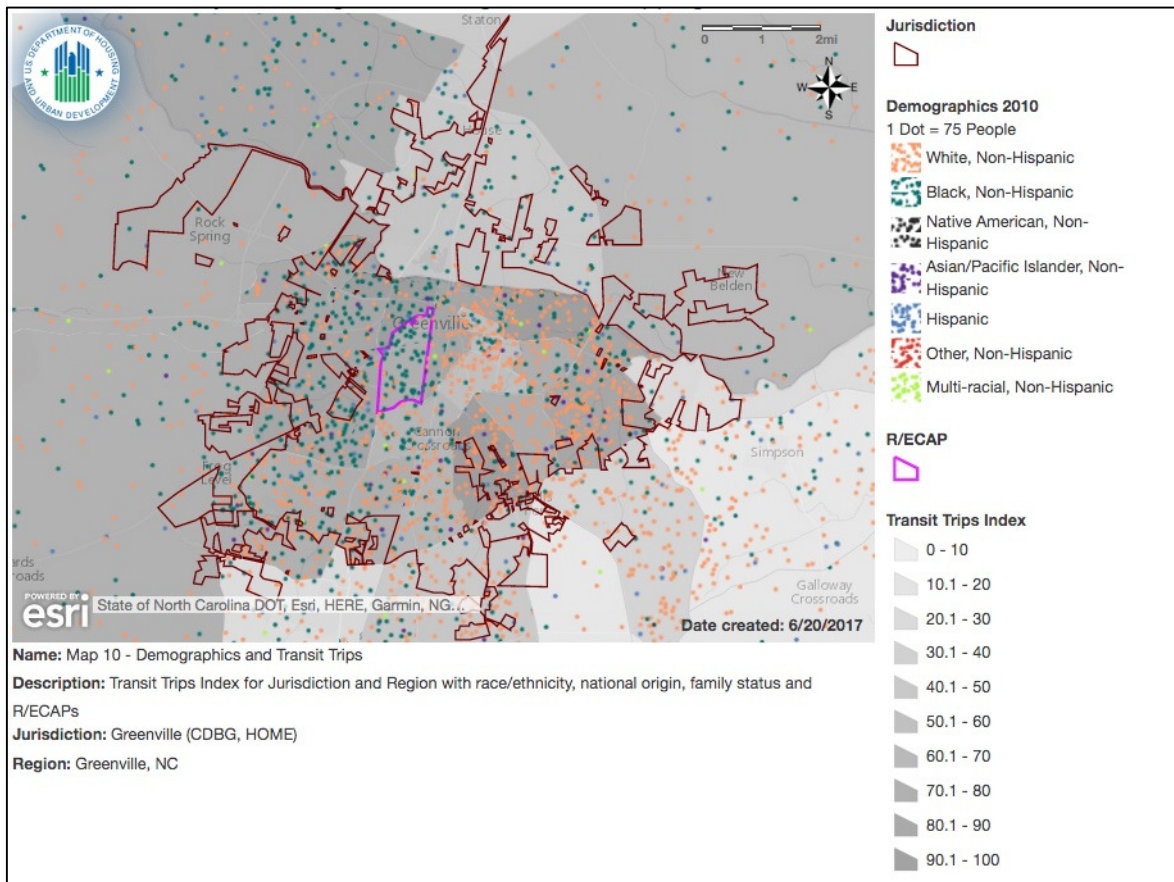
The 2013-2018 Consolidated Plan recognized the need for suitable employment in order to reduce poverty. To assist with this CDBG funding allows transitional housing providers (i.e. Greenville Community Shelter) to assist families with job training and educational programs. These programs focus on Certified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

Transportation

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.

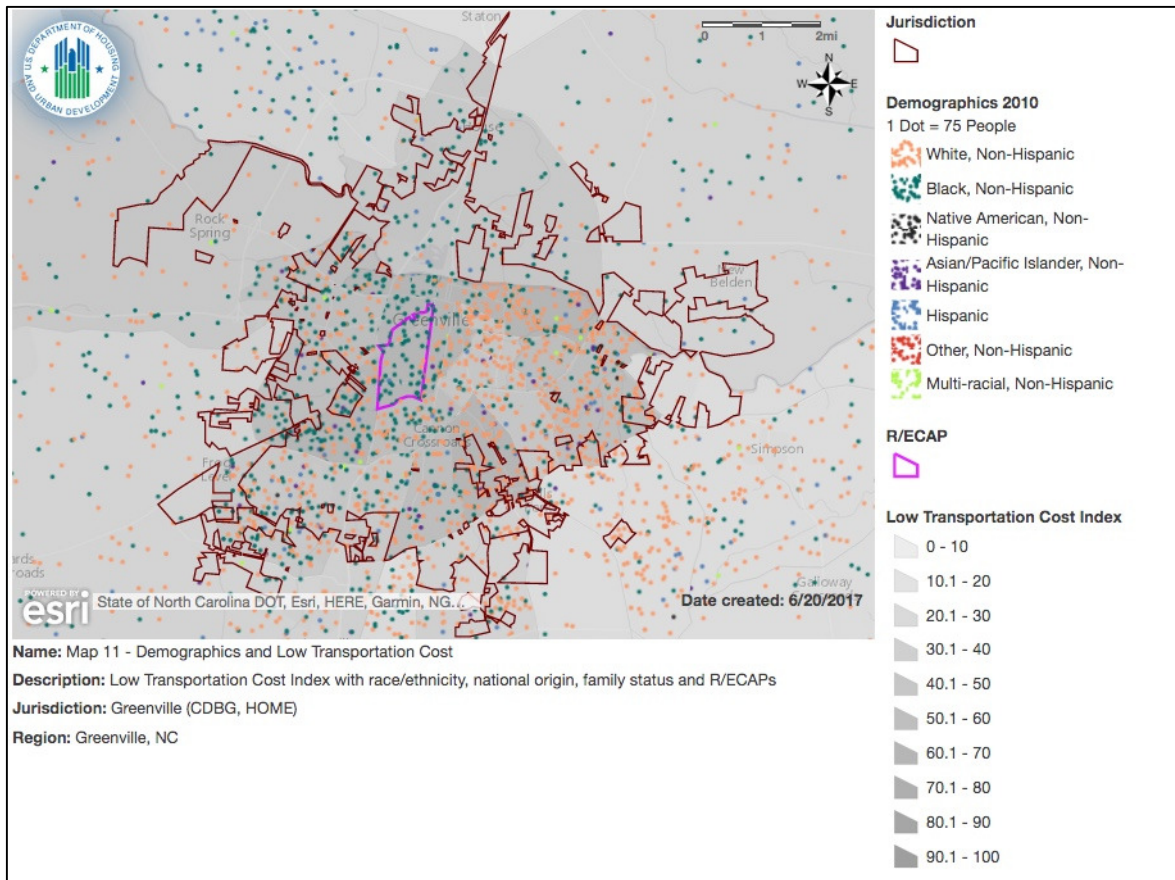
MAP 10 – Demographics and Transit Trips



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



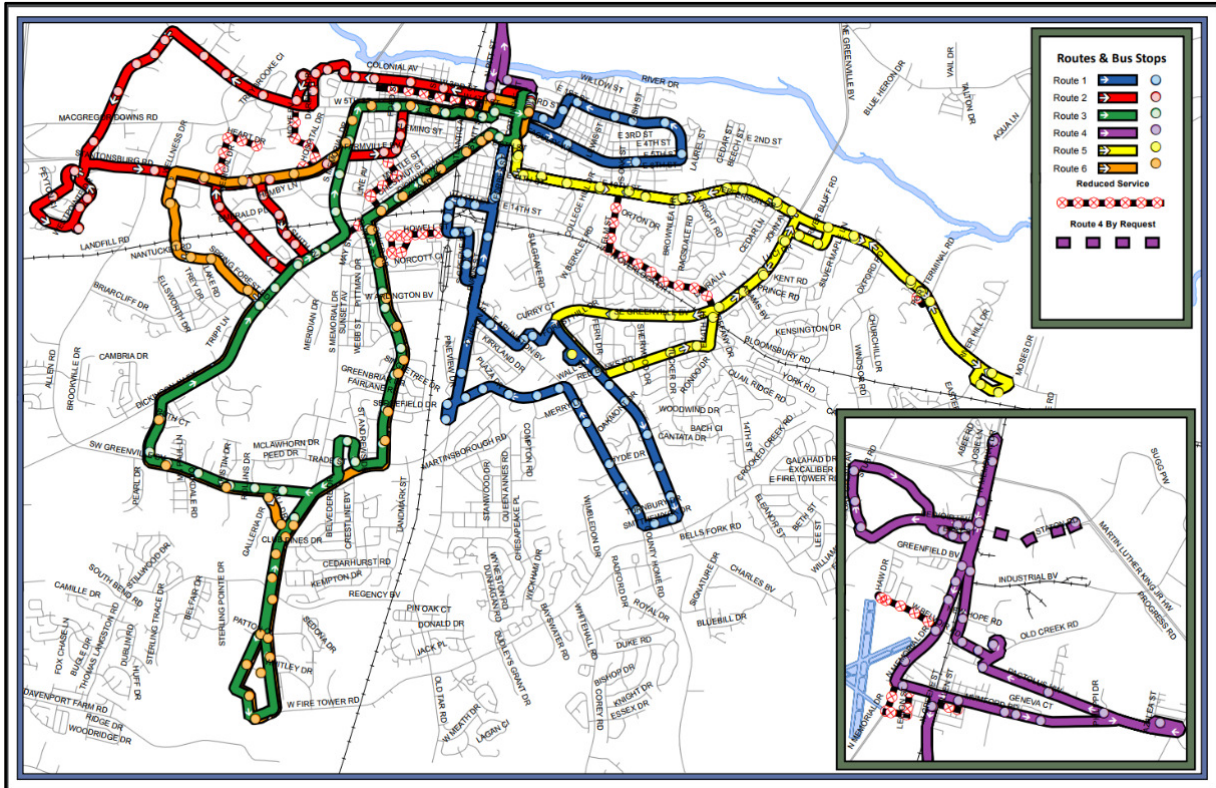
Source: HUD

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 towards the center of town than they are on the outskirts.

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 7:00pm on weekdays and after 6:00pm 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 drove alone and the second most common is personal vehicle carpool. The following table displays means of transportation to work within Greenville.

	#	%
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 renter-occupied housing 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		

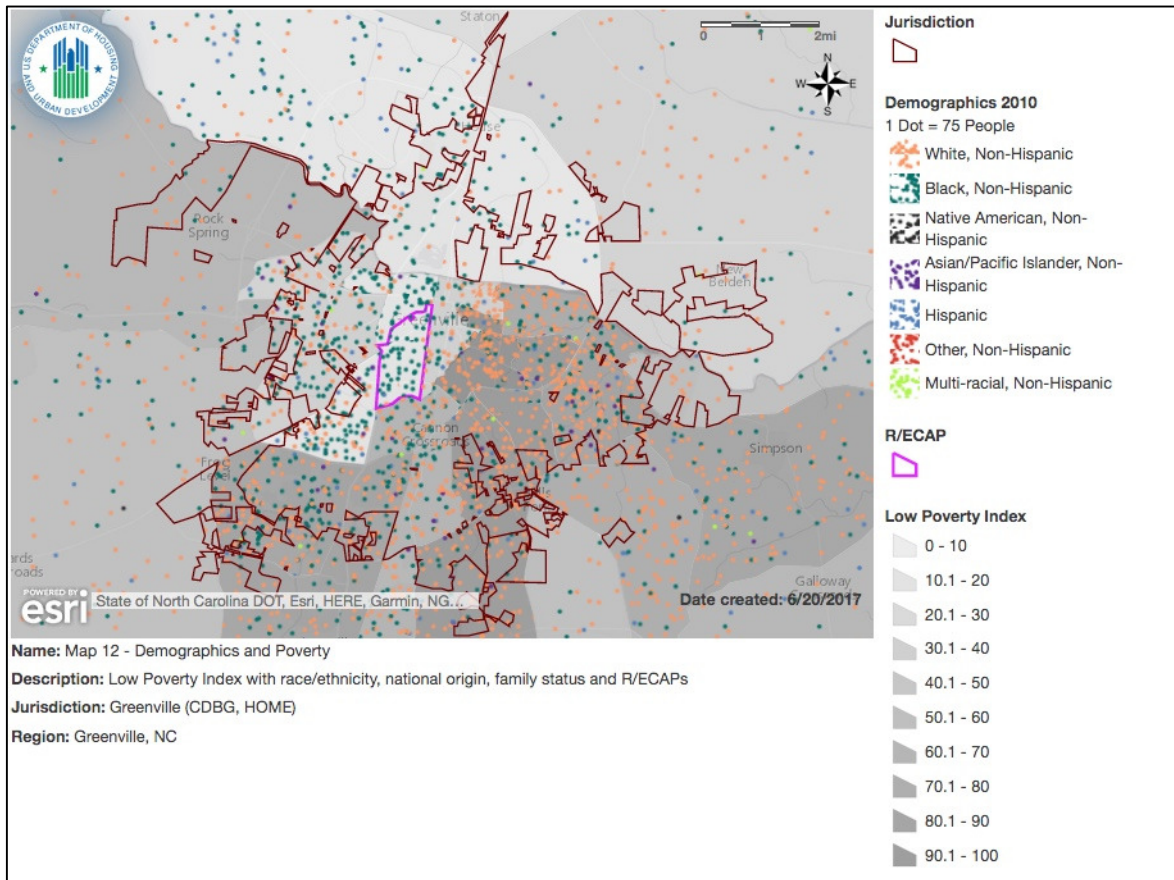
Access to Low Poverty Neighborhoods

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

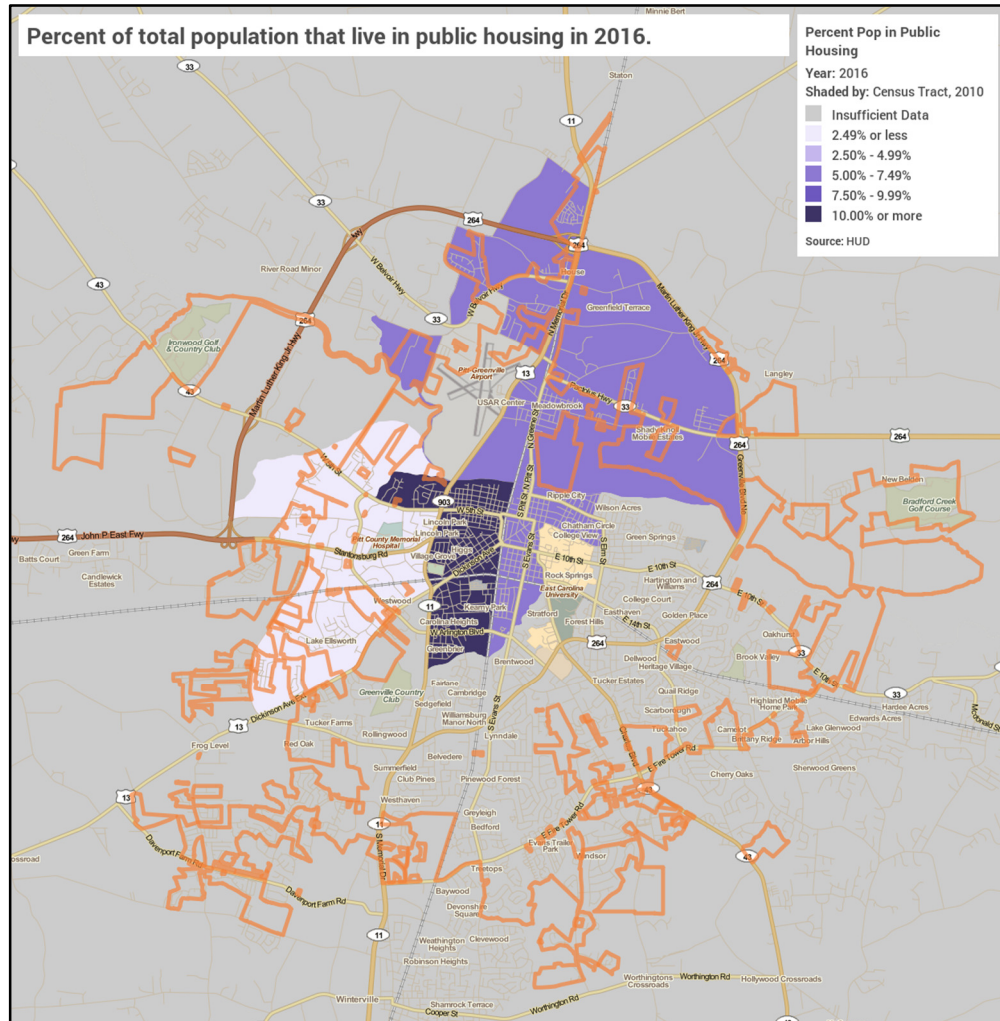


Source: HUD

According to the HUD-provided map and table the western part of the city, including the R/ECAP tract, have 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.

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



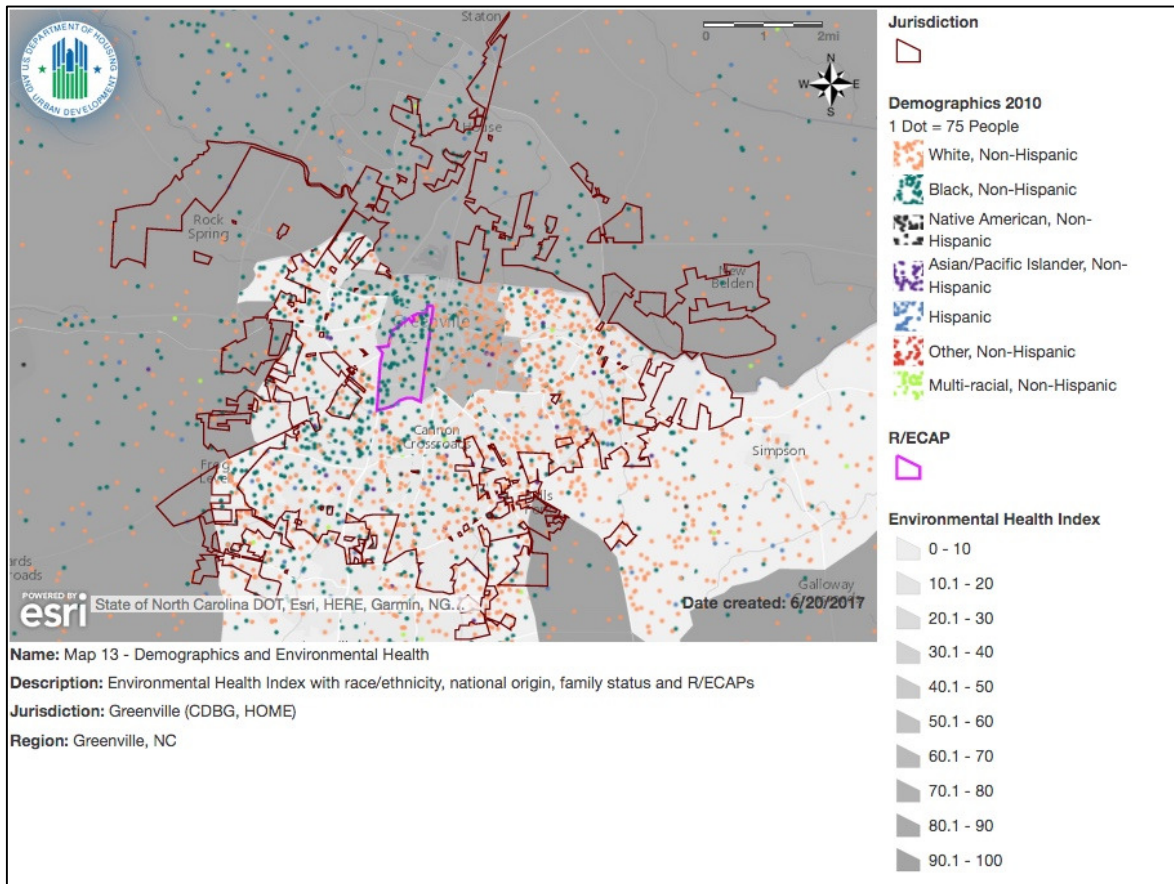
Source: HUD via PolicyMap

Access to Environmentally Healthy Neighborhoods

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 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

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.

Patterns in Disparities in Access to Opportunity

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 a disproportionately high Black, non-Hispanic and Hispanic populations. Not only are these tracts racially segregated and face 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		

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.

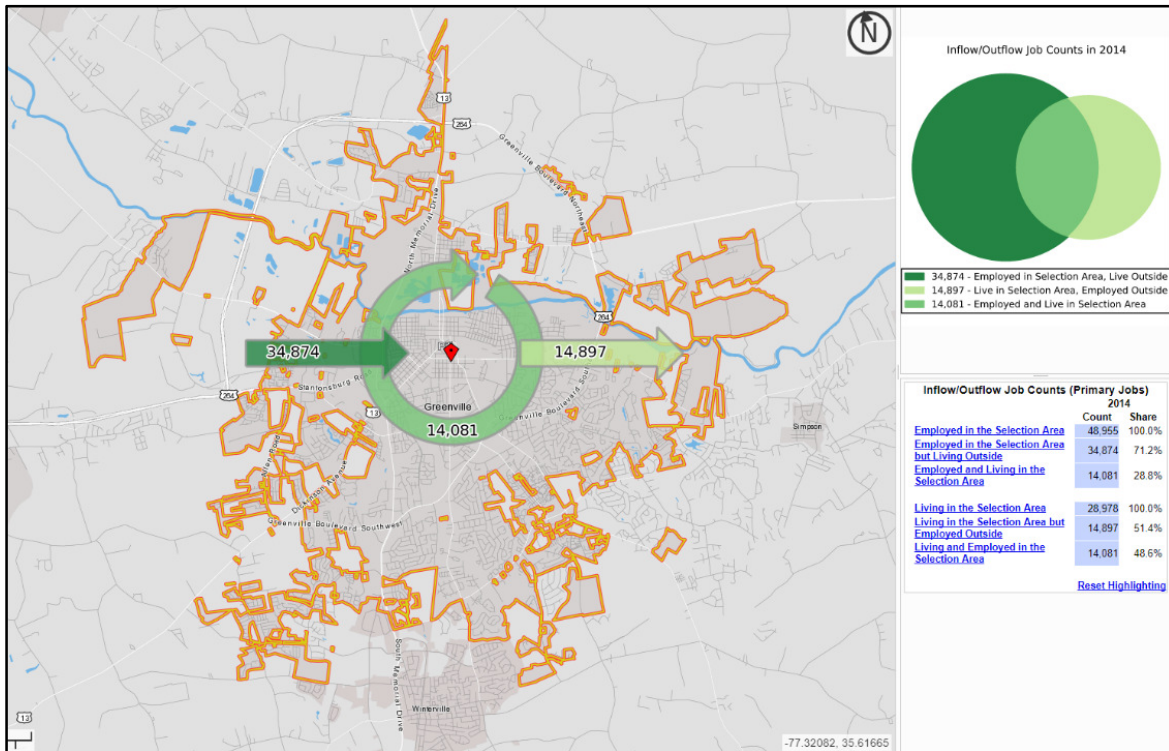
Additional Information

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 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.

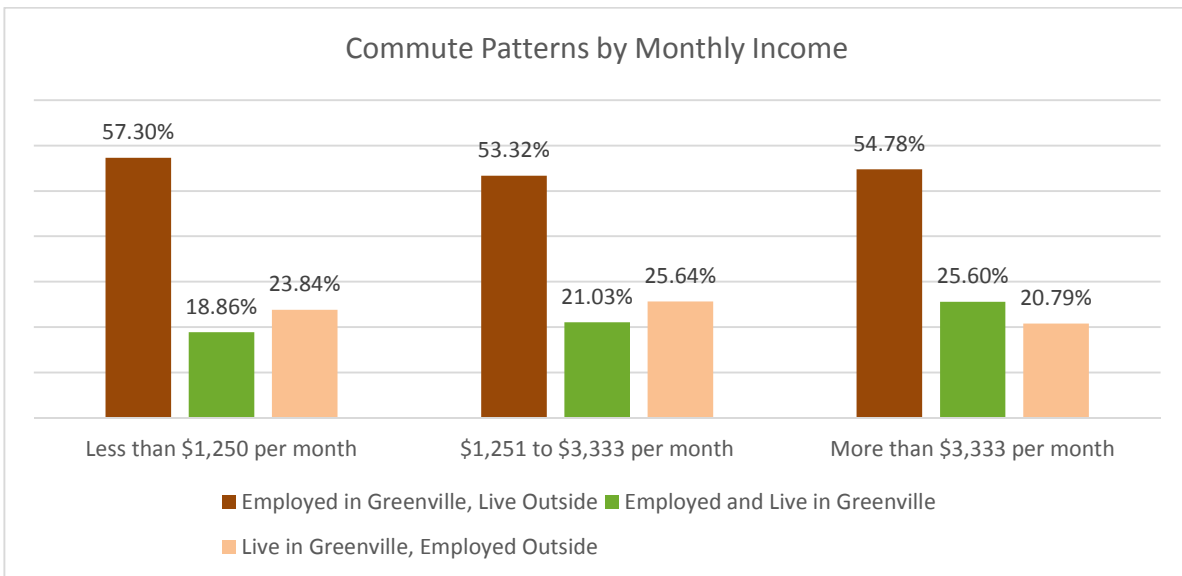
The following map show the commuting patterns for Greenville. The city faces a significant commuting imbalance. Over 70 percent of the workforce lives outside of the city and nearly half of the population that lives in the city leaves it for work. That means nearly 50,000 have commuting situation that 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: US 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 that impacts all income levels. The following table displays commute patterns by monthly income.



Source: US Census Bureau

Contributing Factors of Disparities in Access to Opportunity

The availability, type, frequency, and reliability of public transportation 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 ***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.

Disproportionate Housing Needs

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 incredibly 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.

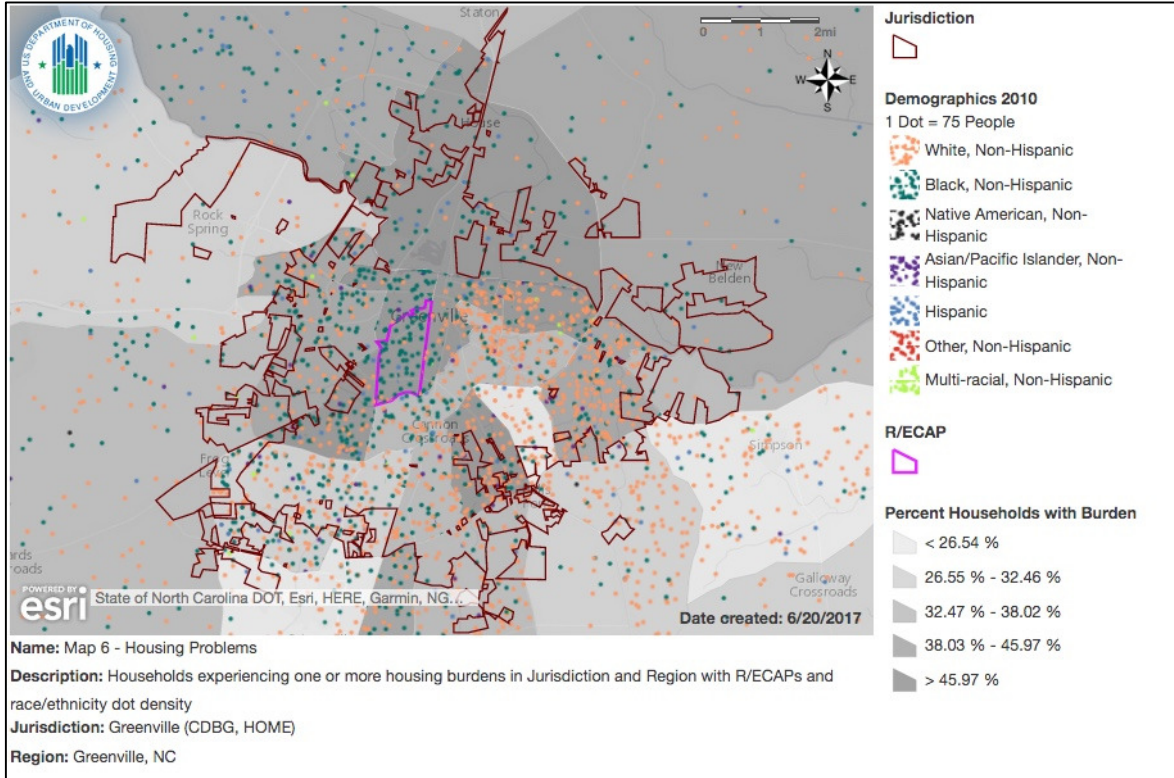
Family Status

Families with five or more people in it face housing problems at a much higher rate than other household types or size, 58.66 percent. Family households with less than five people 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			

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 (over 45.97 percent), including the three R/ECAP tracts. The following map displays the percent 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 over .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				

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 is appropriate home options for the households who utilize the programs, 881 of the families have children and 1,224 of the households have 2 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								

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		

Additional Information

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, North Carolina, 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, over 2,460 or 54 percent were approved and originated, an increase of over 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 including 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
Source: 2015 HMDA				

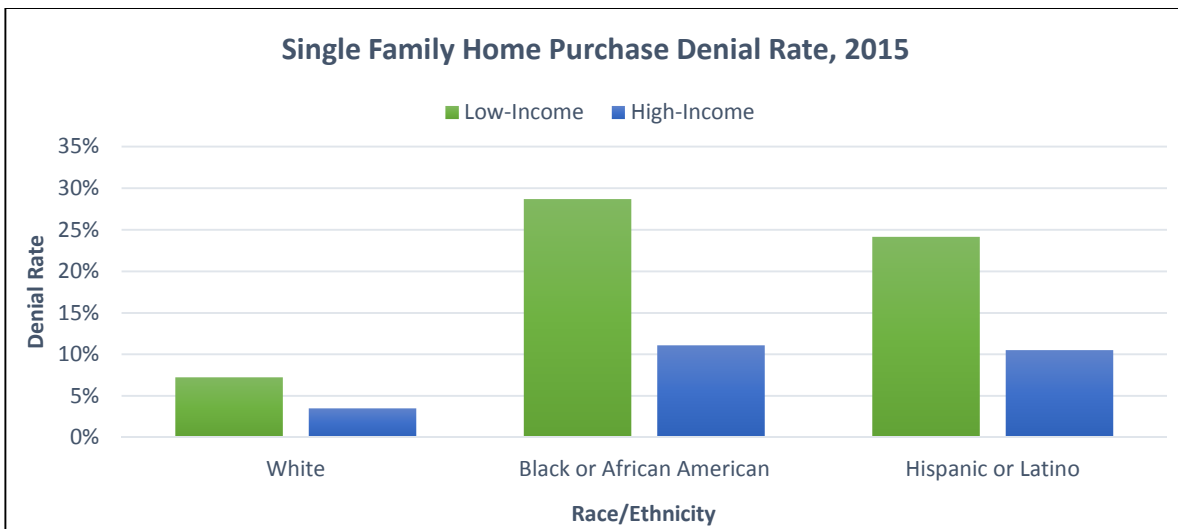
Of the home purchase loans for single family homes that were originated in 2015, (1,500 loans originated) approximately 70 percent of these originations were provided by conventional lenders, higher than the national conventional home purchase share of 61 percent. The remaining 30 percent were provided 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 over 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 refi. denials), followed by lack of collateral (21 percent of refi. 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 (over 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 the 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.

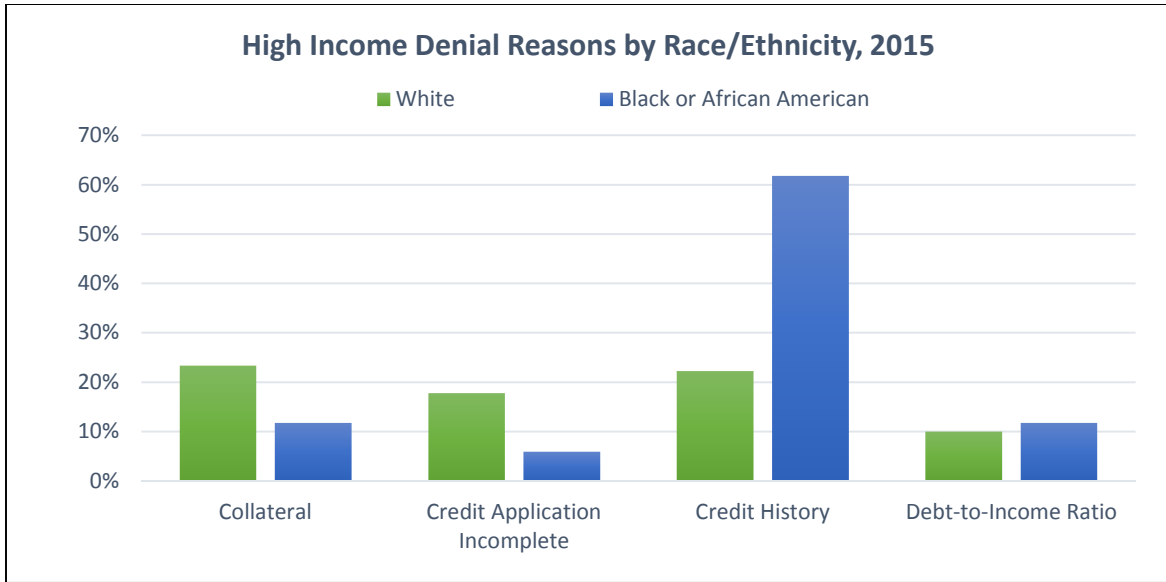


Application Denial Reasons by Income Group

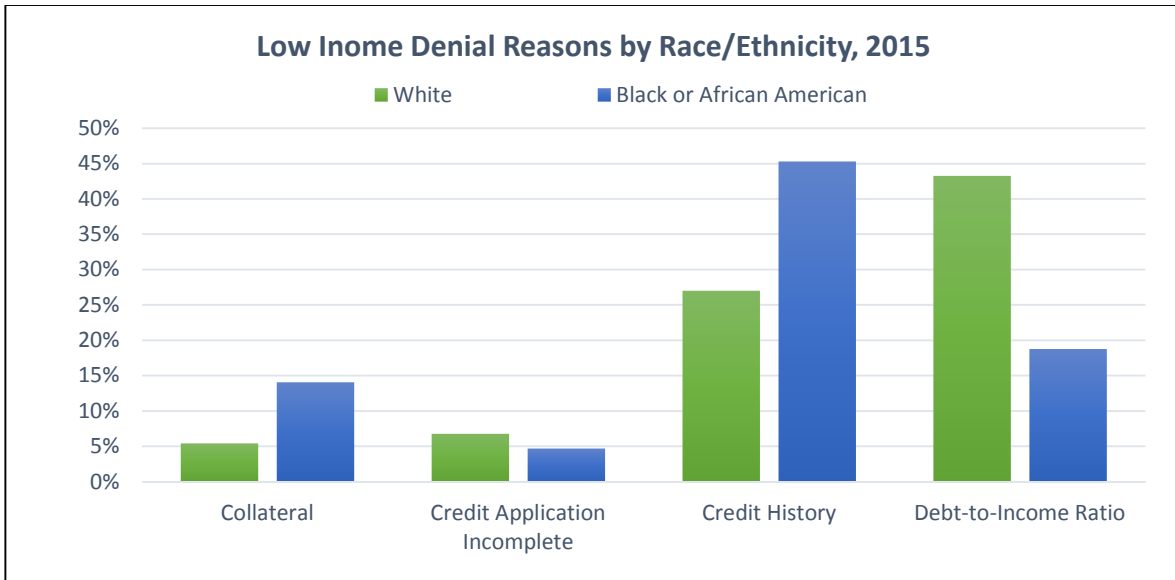
The below charts compare denial reasons among Black and White applicants in Greenville for 2015 by income group. Hispanic and Asian applicants are excluded due to small sample sizes.

As of 2015, the leading denial reason for High Income Black applicants by a significant margin was credit history, representing over 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.



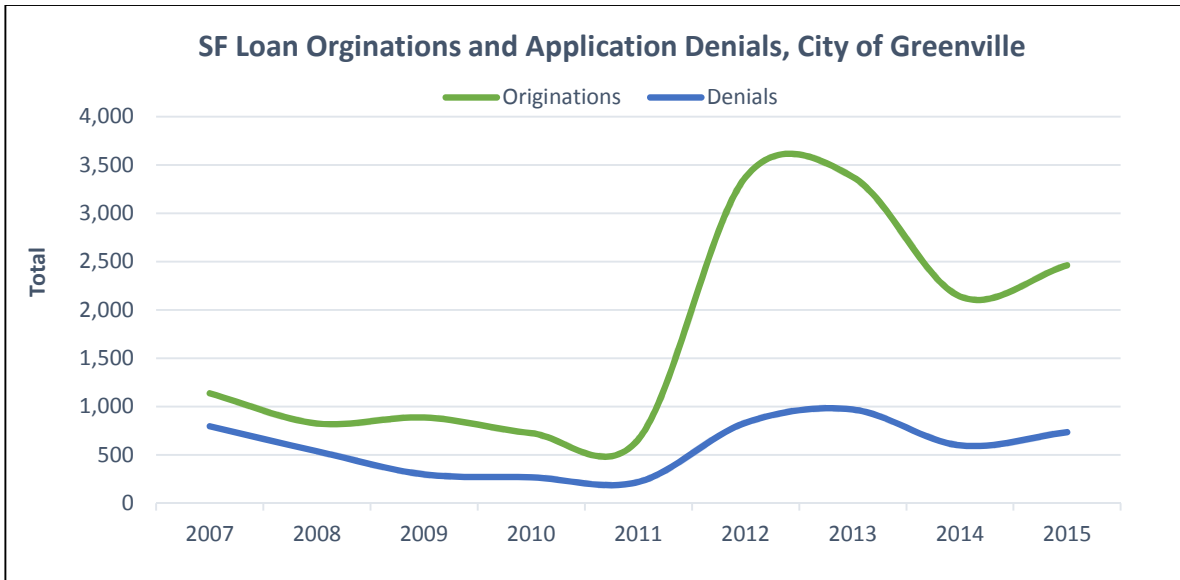
For Low Income denials, lack of collateral and incomplete credit applications represented relatively small shares in 2015, with the mild exception of the 14 percent of Low Income Black applicants that were denied for lack of collateral. Both Low Income Black applicants and Low Income White applicants 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 over quadruple. Similar to High Income Black applicants, credit history was the primary denial reason for Low Income Black applicants.



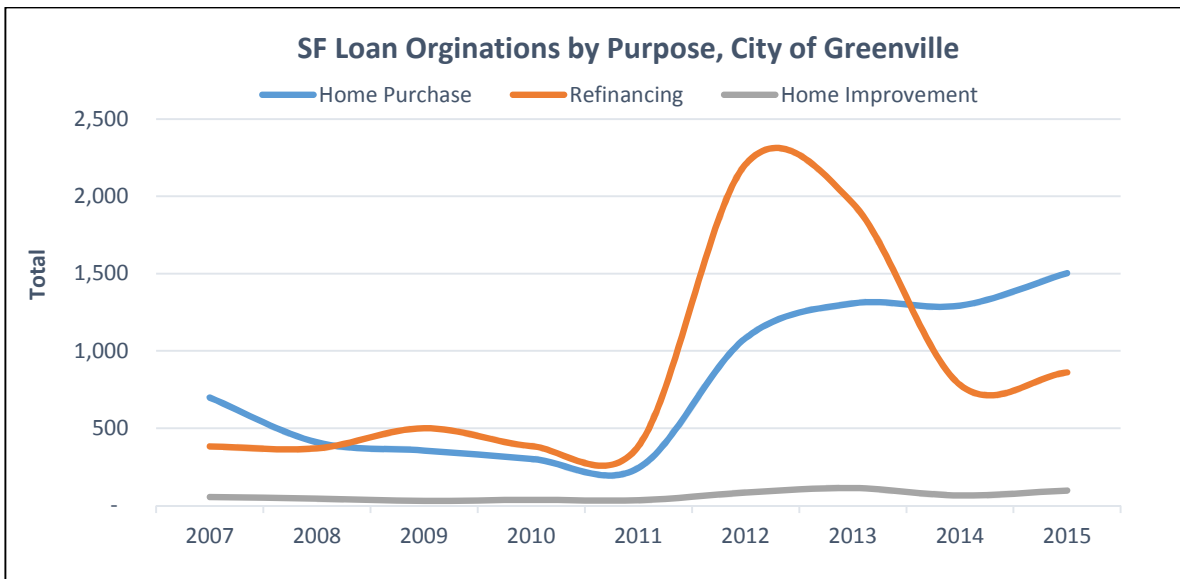
Greenville’s Single-Family Lending Market, 2007-2015

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. However, between 2011 and 2012, the total number of originations in Greenville more than quintupled, increasing by over 2,700 and reaching nearly triple the 2007 total. Loan originations then fell by over a third between 2013 and 2014, though grew by over 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 over 40 percent to approximately 23 percent.

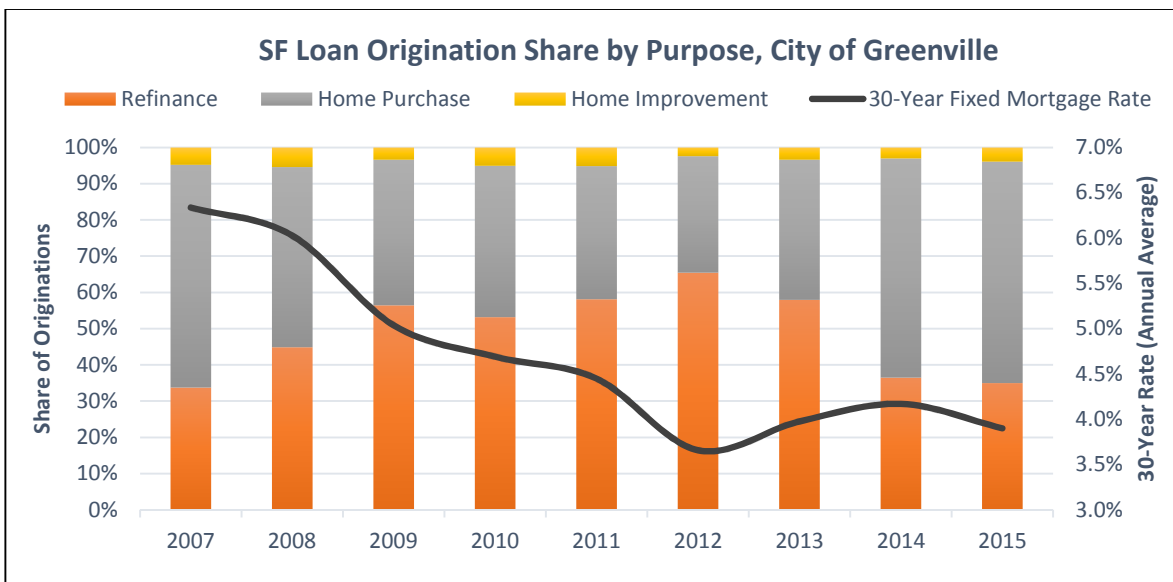


Shown below, much of the year-to-year fluctuations in total originations that occurred between 2007 and 2015 were the result of refinancing originations. Though home purchases represented the top loan purpose by total originations prior to the housing bust in 2008, refinancing became the leading loan 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 over 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

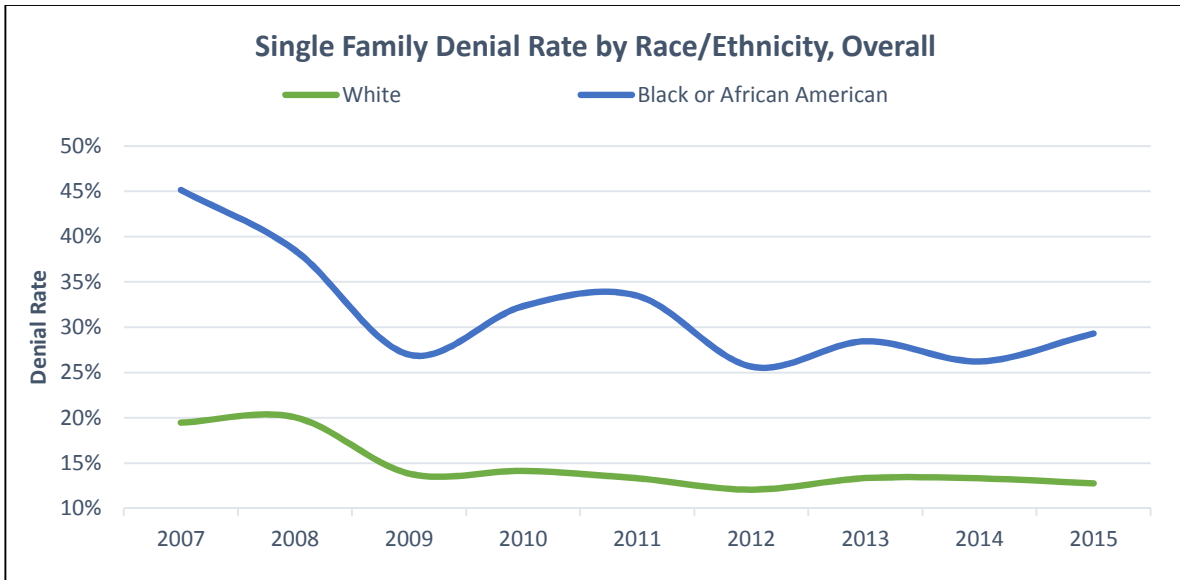
Greenville surged in absolute number terms and reached the highest share of all years examined. The decrease in the annual average of the 30-year fixed mortgage rate between 2014 and 2015 is consistent with Greenville’s 10 percent growth in the number of refinance loans over the same time period.



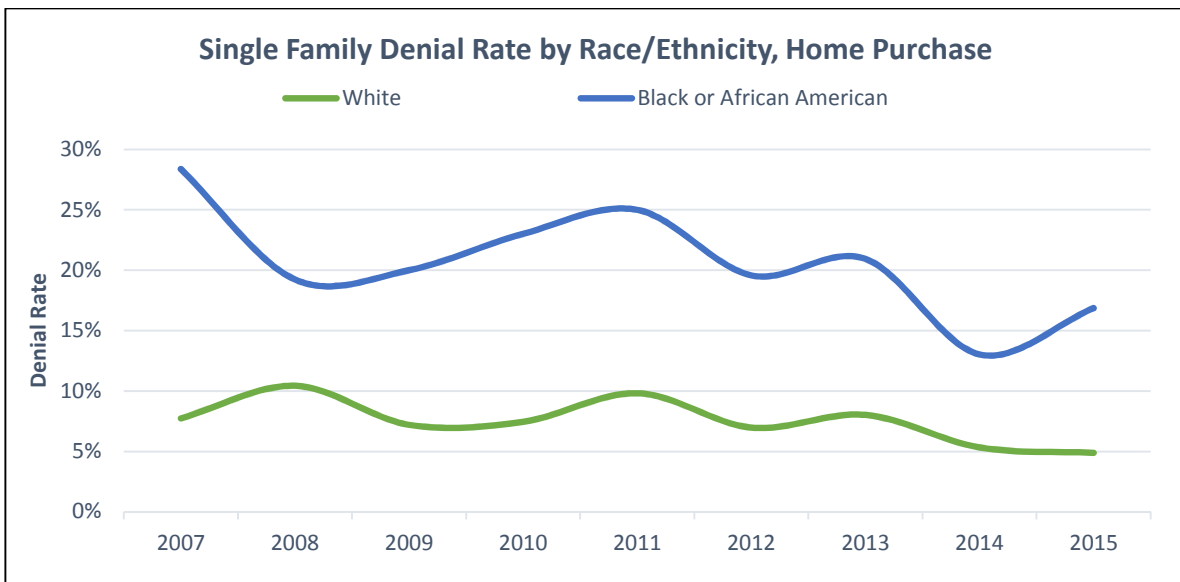
Source: HMDA, Federal Reserve Bank of St. Louis

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

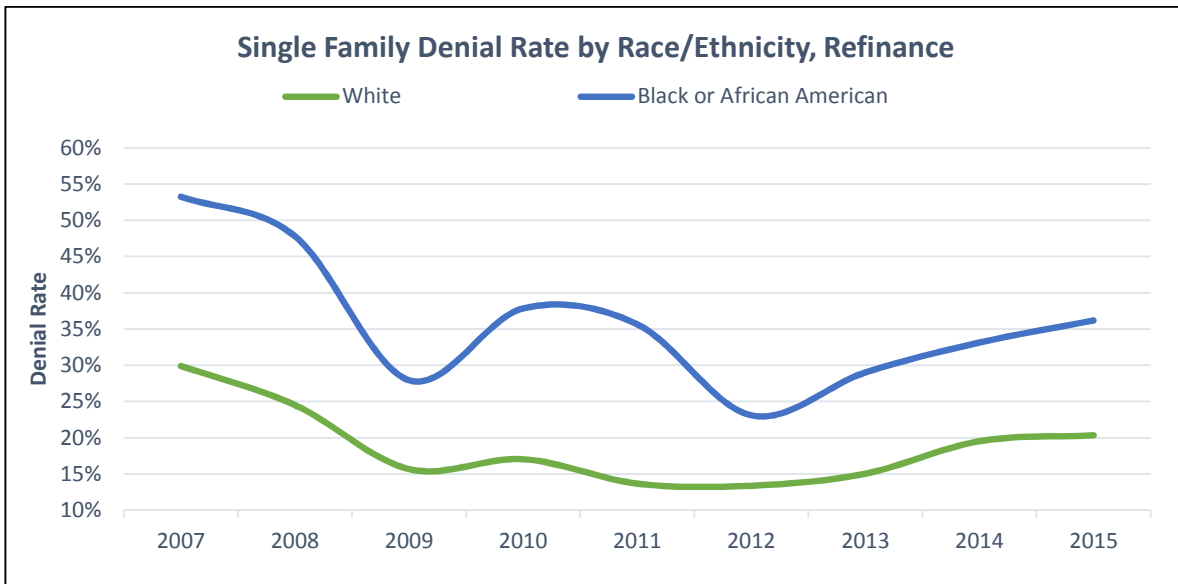
Denial rates for single family loans in Greenville over time vary by race and ethnicity. The charts below show that between 2007 and 2015, White applicants were less likely to be denied relative to Black applicants for all years examined. Though the denial rate for Black applicants has fallen significantly 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.



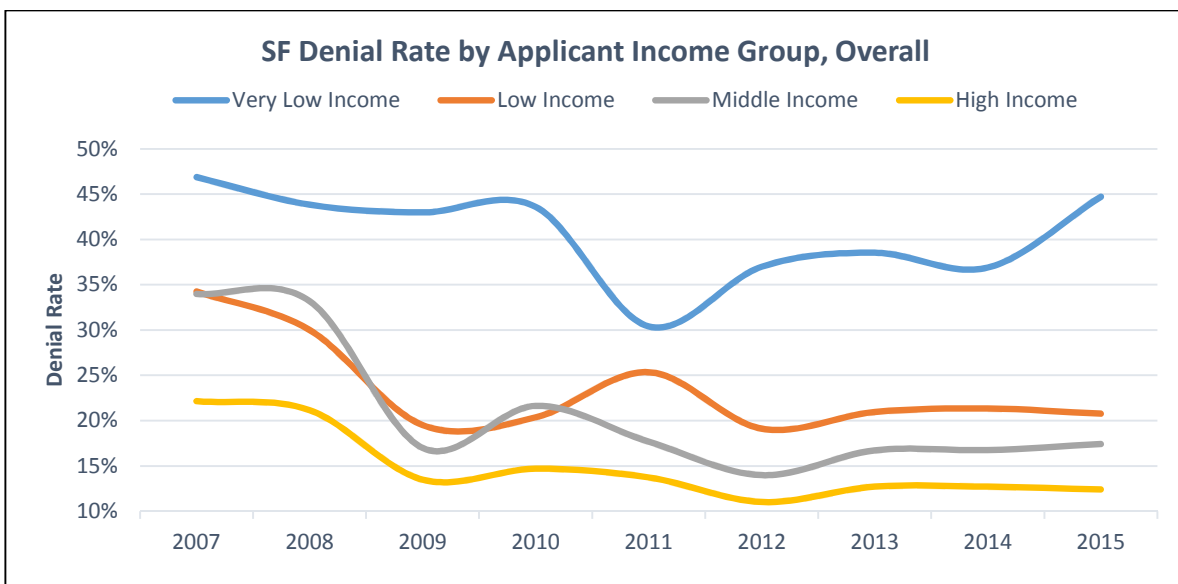
Home purchase applications exhibit lower denial rates for both Black and White applicants relative to overall denial rates. However, the gap between Black and White denial rates is greatest for home purchases, with Black applicants more than 3.4 times as likely to be denied for a home purchase relative 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.



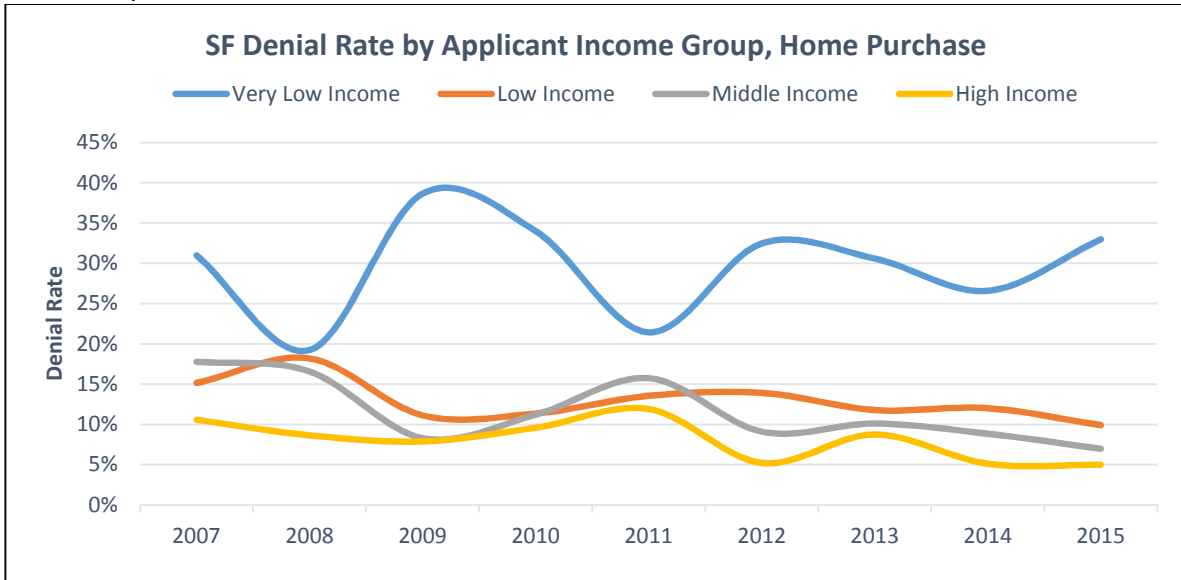
Consistent with the overall denial rate as well as the denial rate for home purchases, Whites were the group with the lowest denial rate for a refinance application in all study years. For both Black and White refinance applicants, denial rates have been increasing each year 2012.



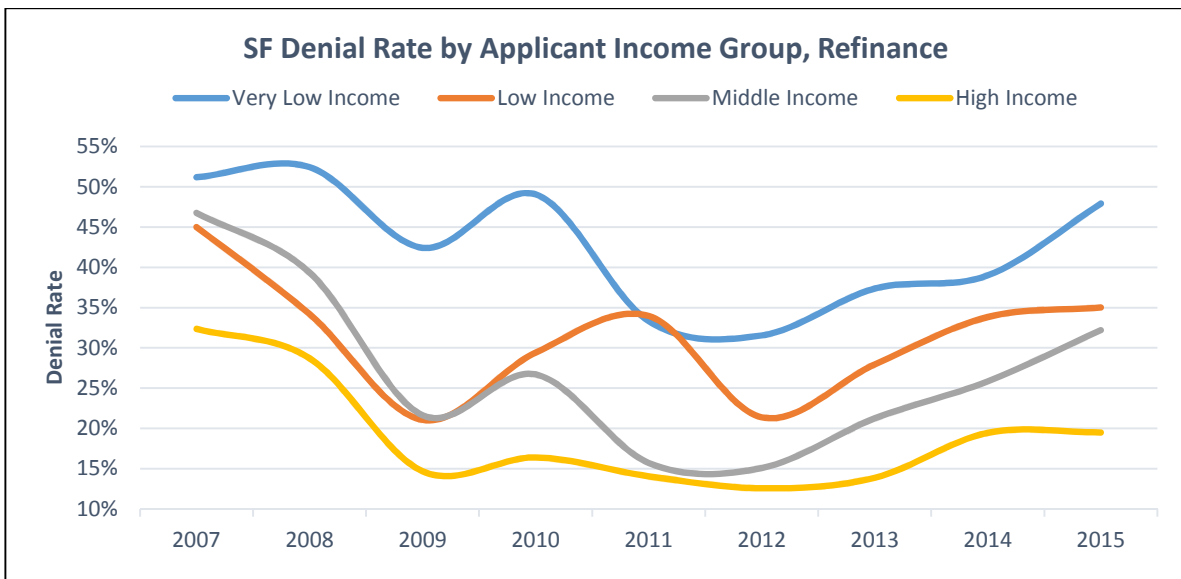
A view of single family denial rates by applicant income group within Greenville, highlighted below, shows the expected outcome of higher income groups generally experiencing lower denial rates than lower income groups. However, Very Low-Income applicants (50 percent or less of Area Median Income) have 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 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.

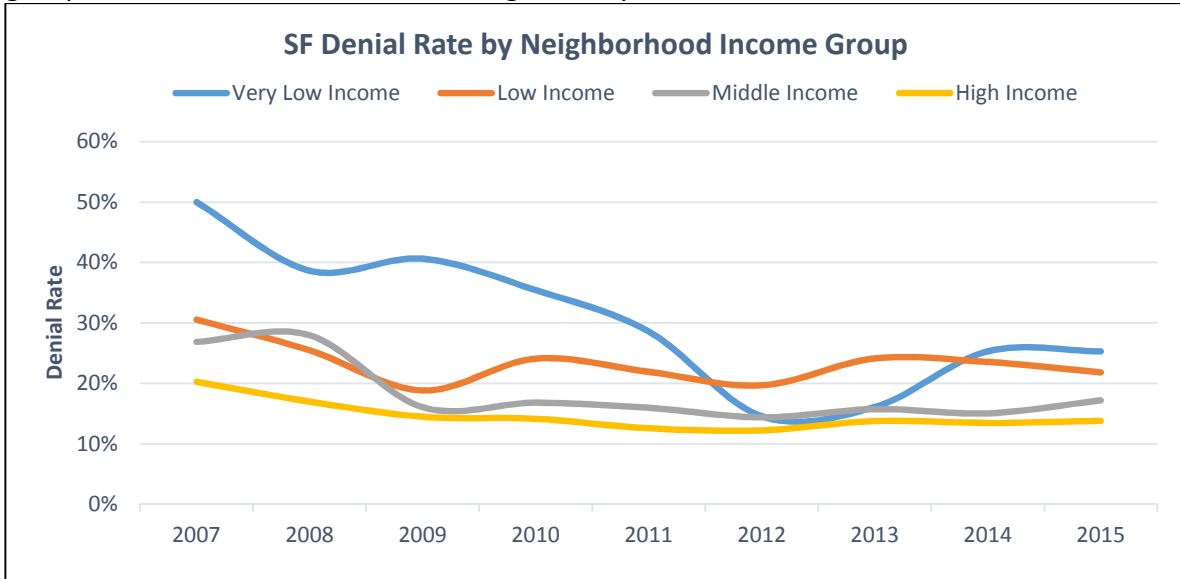


For all income groups, denial rates for refinance applications were higher than overall denial rates as well as those for home purchases as of 2015.

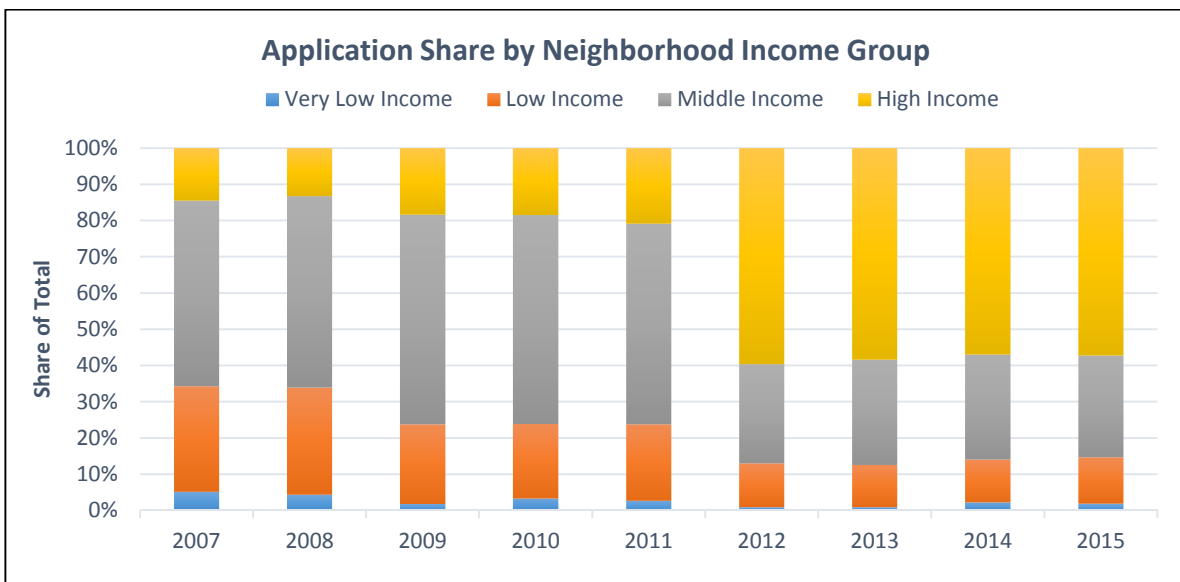


In addition to the income of the applicant, the median income of the property's neighborhood (defined as Census Tract) also reveals the High-Income group outperforming other groups with regards to the denial rate. Though the sample size for Very Low-Income

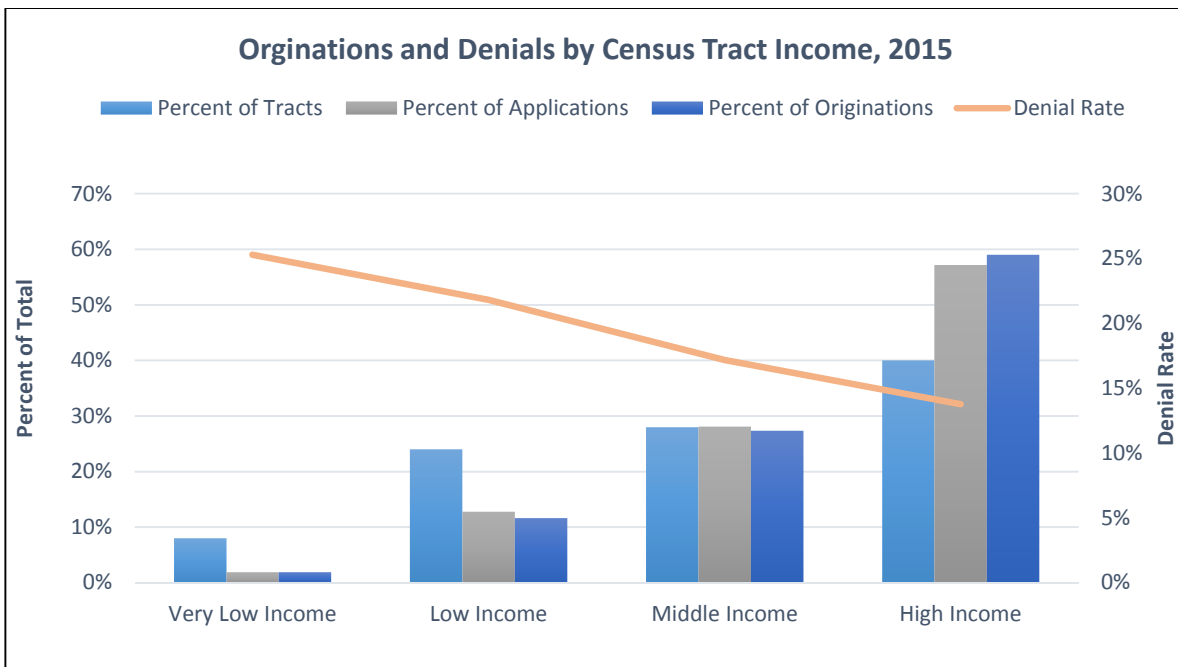
neighborhoods is much lower than other groups (discussed further below), years 2012 and 2013 show Very Low-Income neighborhoods experiencing lower denial rates than Low Income neighborhoods. However, in 2014 and 2015, the ranking of denial rates by neighborhood income groups was ordered by level of income. 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.

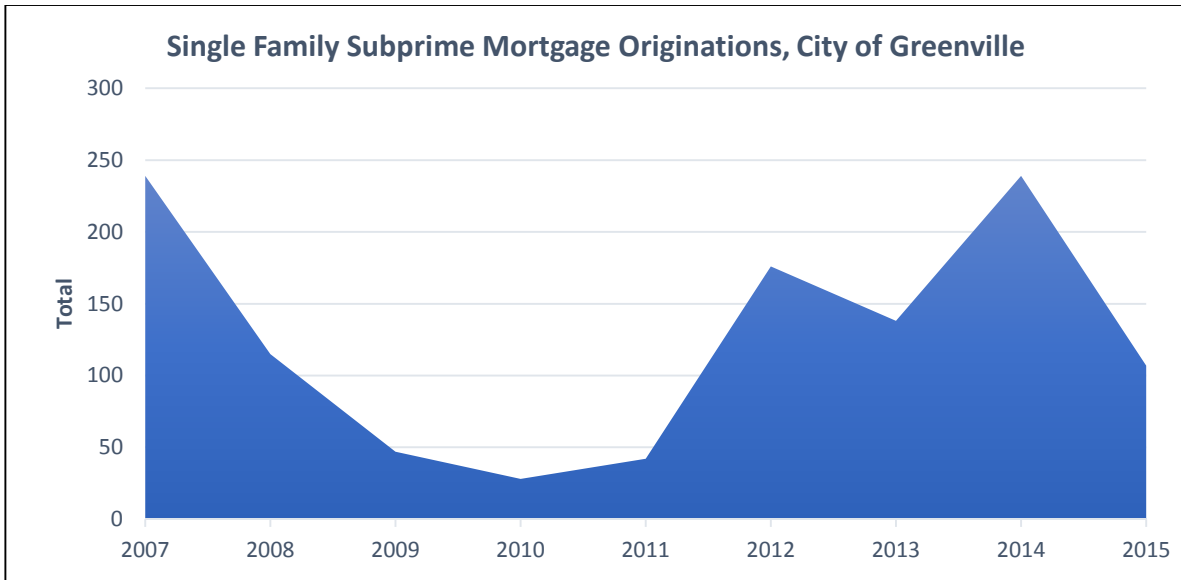


Within Greenville, Very Low Income and Low-Income neighborhoods represent 32 percent of the City’s total neighborhoods, although they are represented by approximately 14 percent of total originations and 15 percent of total applications as of 2015, shown below. This suggests that Low and Very Low-Income 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.



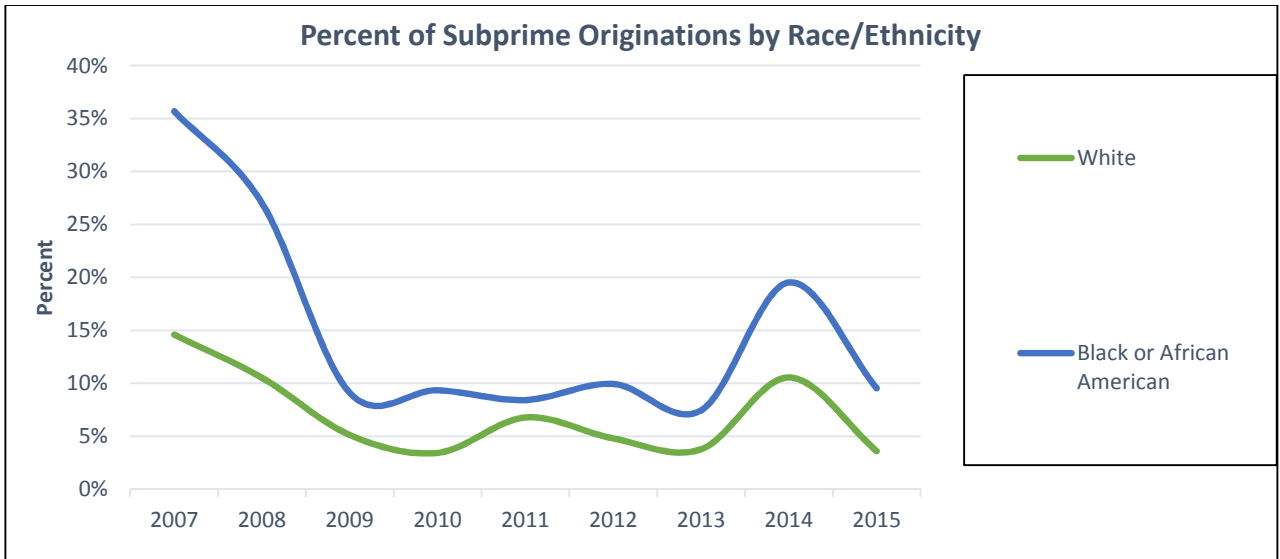
The Subprime Market

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. However, since 2010, the number of subprime loan originations has grown by over 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.

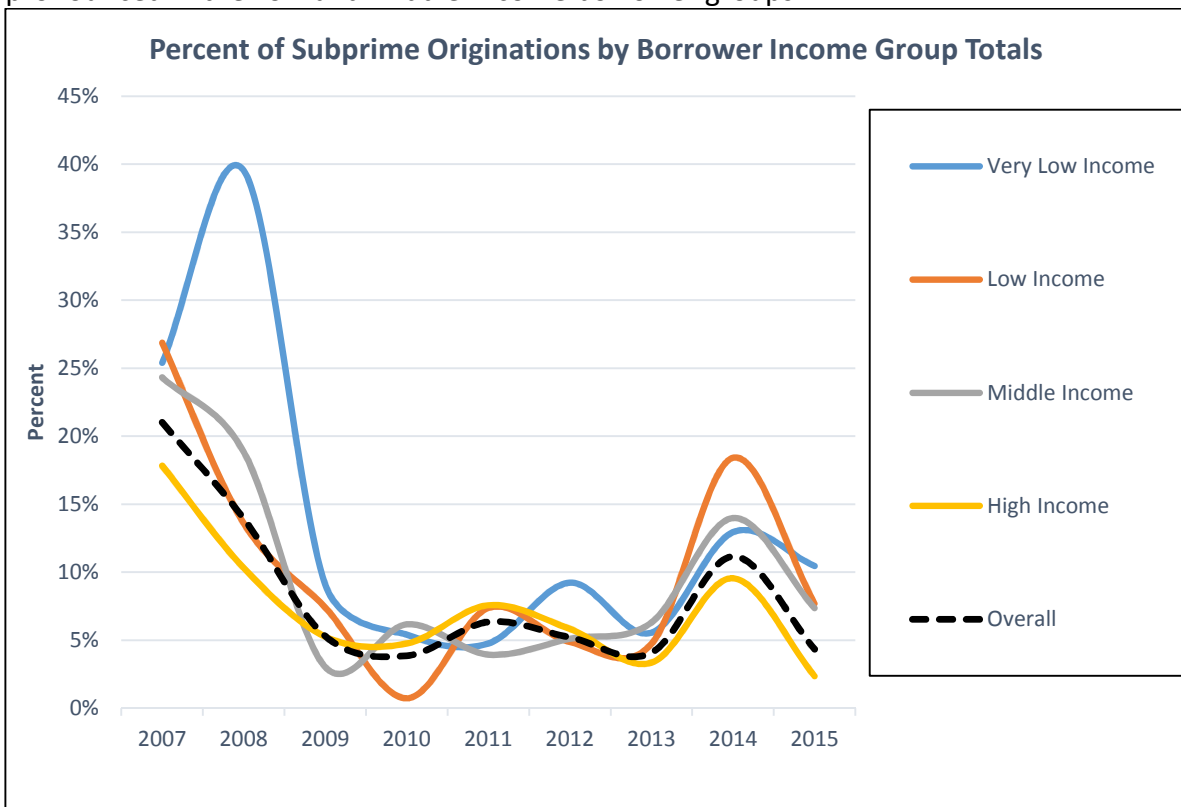


Looking at the share of subprime loans as a percentage of total originations by race reveals that Black loan recipients were nearly two and a half times as likely to be subprime relative to White loan recipients in 2007. This trend is consistent with the broader national pattern of minorities being disproportionately subjected to predatory subprime lending leading up to the housing crash, as outlined in a post-crisis report by the US Department of Housing and Urban Development.³ 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. However, as of 2015, 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.

³ https://www.huduser.gov/portal/publications/foreclosure_09.pdf

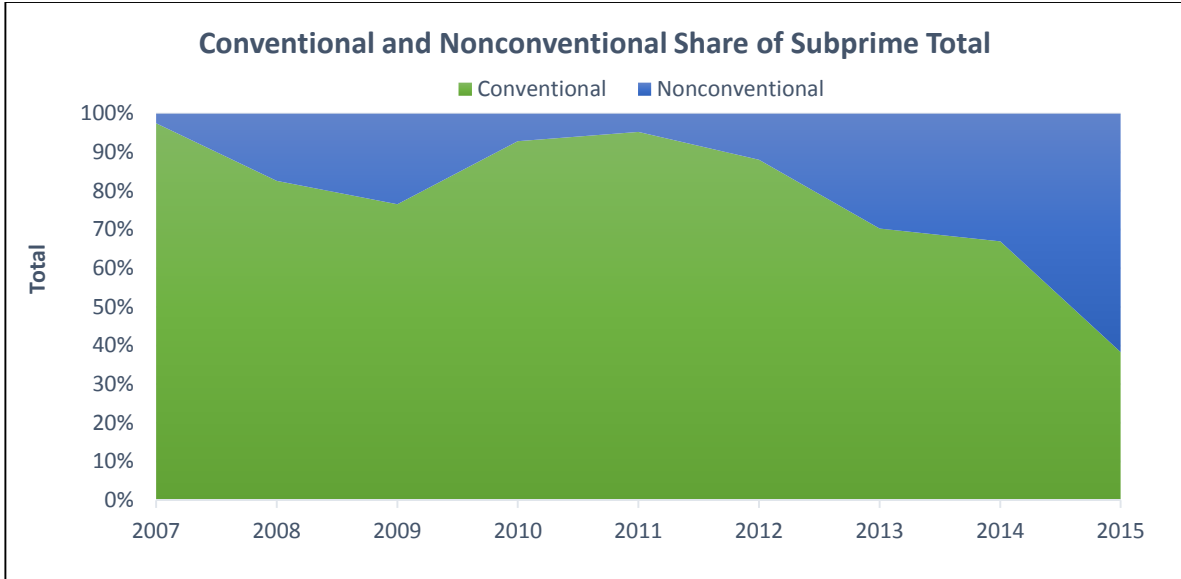


A view of subprime originations by income group totals shows a sharp decline between 2007 and 2010 among all groups, with broad increases from 2013 to 2014. Between 2014 and 2015, however, subprime shares for all income groups decreased, with changes most pronounced in the Low and Middle-Income borrower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

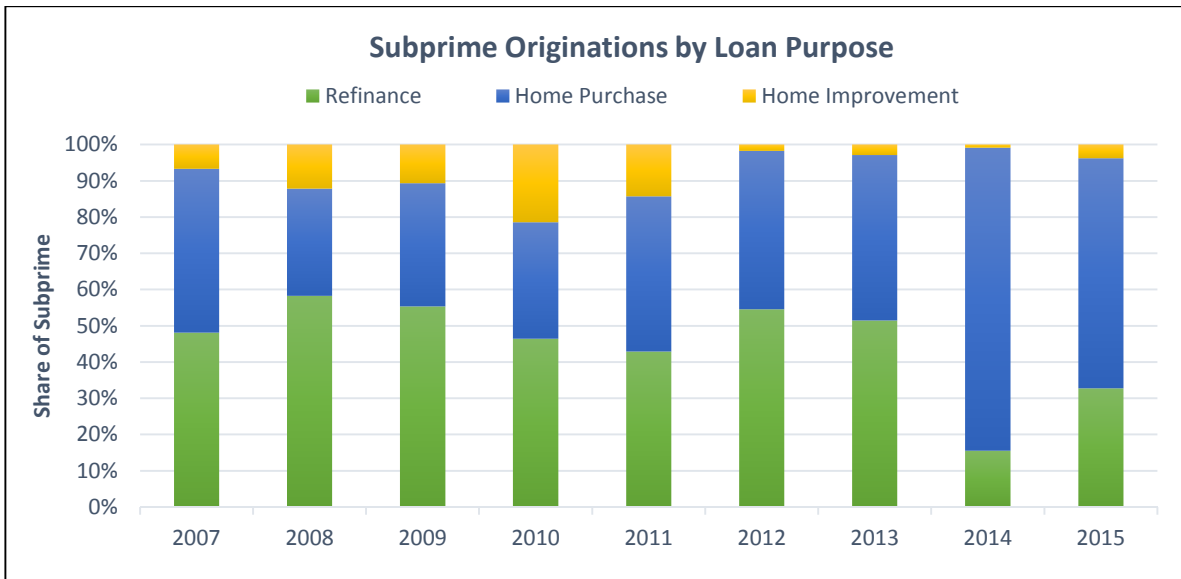


Consistent with broader national trends, the composition of subprime loans within Greenville has shifted from conventional loans to government-insured nonconventional loans in recent years. In 2007, approximately 98 percent of subprime loans within the City

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 (over 98 percent in 2015).

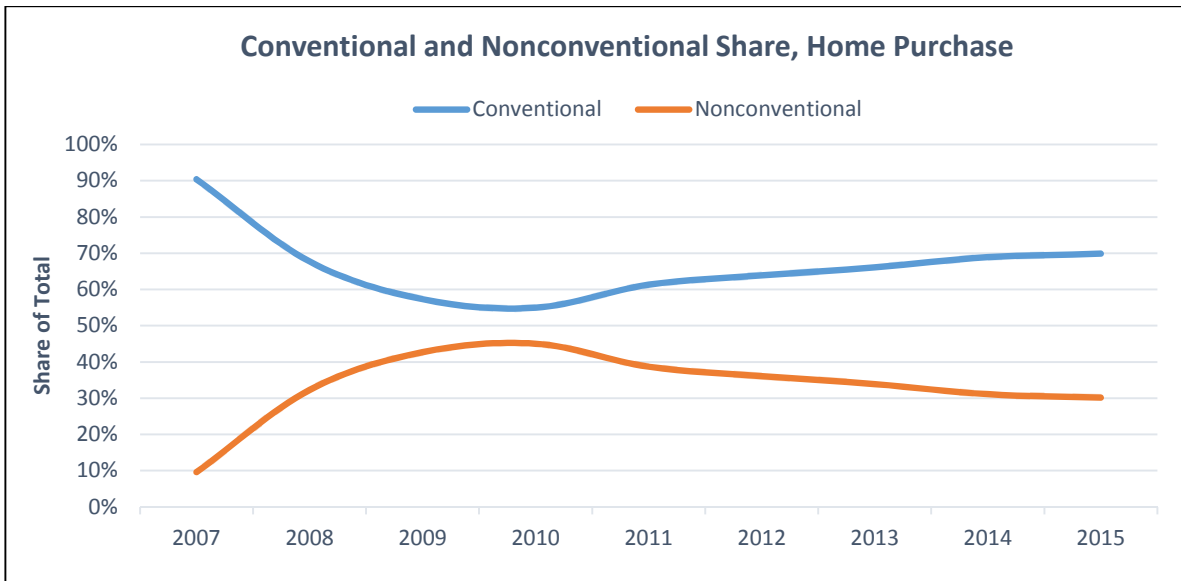
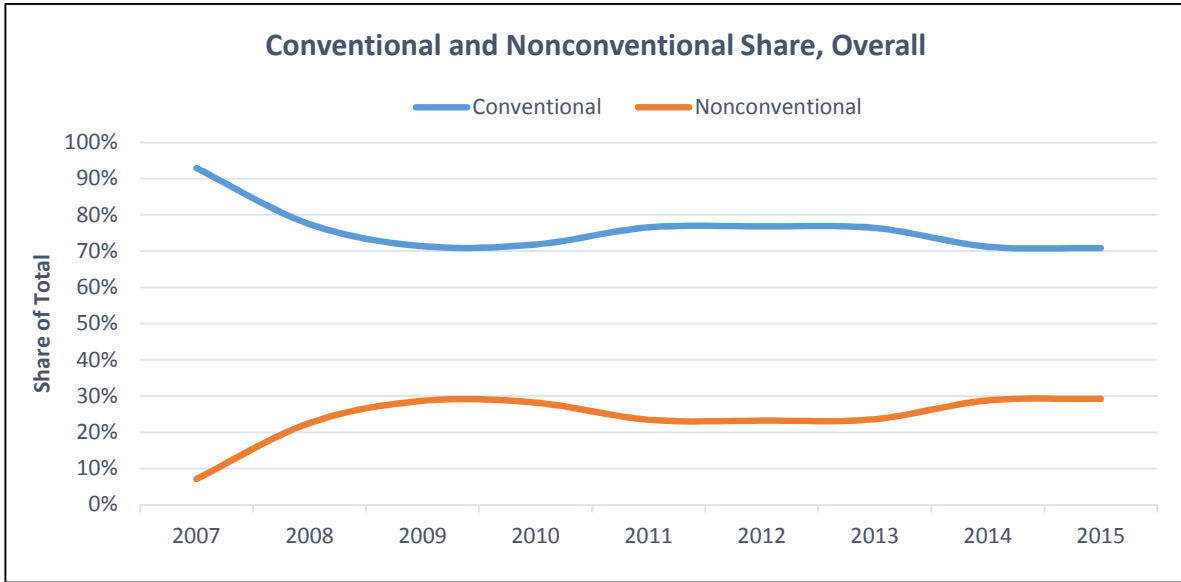


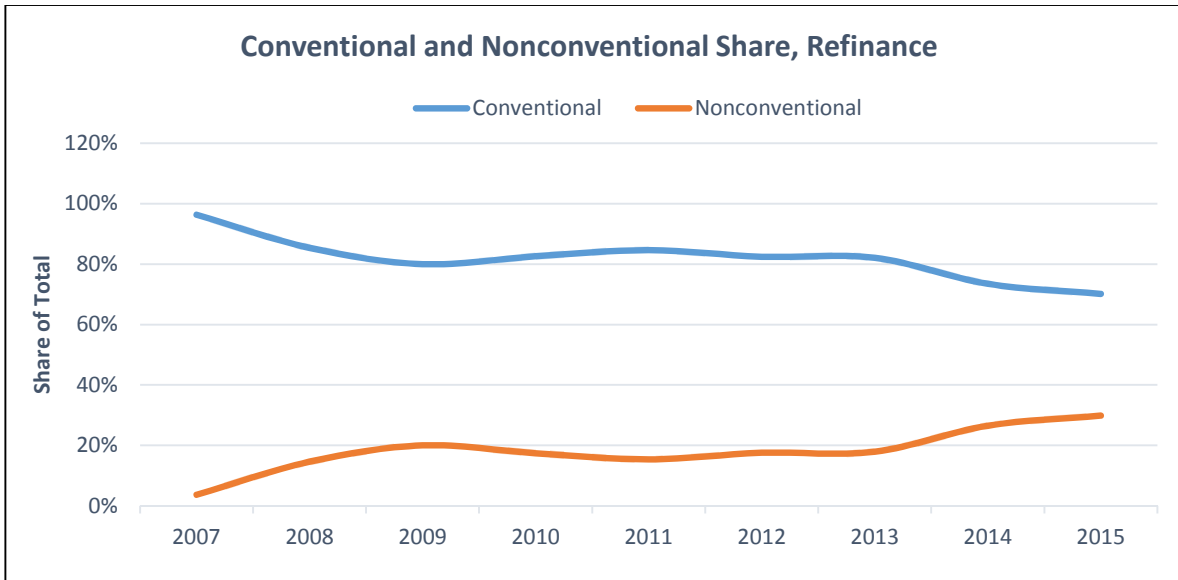
As a percentage of all subprime loan originations within Greenville, home purchases represented nearly two-thirds in 2015, up from 45 percent in 2007 and a low of 32 percent in 2010, though down from a peak of approximately 84 percent in 2014.



Though subprime loans within Greenville are mostly nonconventional, over 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, Great 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.

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

Contributing Factors of Disproportionate Housing Needs

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, 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.

	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% 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 costs 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.

Publicly Supported Housing Analysis

Overview

Fair Housing is the right of individuals to obtain the housing of their choice, free from discrimination based on race, color, religion, sex, disability, familial status, or national origin. This right is assured by the Federal Fair Housing Acts of 1968 and 1988, as amended, which make it unlawful to discriminate in the sale, rental, financing, or insuring of housing. The Fair Housing Acts, as amended, also make it unlawful for municipalities to utilize their governmental authority, including zoning and land-use authority, to discriminate against racial minorities or persons with disabilities. Zoning ordinances segregate uses and make differentiations within each use classifications. While many zoning advocates assert that the primary purpose of zoning and land-use regulation is to promote and preserve the character of communities, inclusionary zoning can also promote equality and diversity of living patterns. Unfortunately, zoning and land-use planning measures may also have the effect of excluding lower-income and racial groups.

Zoning ordinances aimed at controlling the placement of group homes are one of the most litigated areas of fair housing regulations. Nationally, advocates for the disabled, homeless, and individuals with special needs have filed complaints against restrictive zoning codes that narrowly define "family" for the purpose of limiting the number of non-related individuals occupying a single-family dwelling unit. The group home arrangement/environment provides for many people who are disabled the only affordable housing option for residential stability and more independent living. By limiting the definition of "family" and creating burdensome occupancy standards, disabled persons may suffer discriminatory exclusion from prime residential neighborhoods.

This Analysis of Impediments to Fair Housing Choice for the City of Greenville discusses the results of recent analyses of impediments and the steps the city intends to take to implement policies that will prevent and eliminate housing discrimination in the community.

Legislation Pertaining to Fair Housing

Numerous acts, laws, and presidential executive orders have been enacted in order to create fair housing opportunities throughout the US. The following information can be found on the website for the US Department of Housing and Urban Development (HUD). Some of the legislation in the section below does not directly address fair housing, but is included because it promotes the prevention and termination of discrimination, which is related to fair housing law.

Presidential Executive Order 11063

John F. Kennedy, in 1963, created the first piece of fair housing legislation by issuing presidential executive order 11063. The terms of the order stated that "discrimination in the sale, leasing, rental, or other disposition of properties and facilities" is prohibited if the

properties or facilities are owned, operated, or funded by the government.

Civil Rights Act of 1964

According to Title VI of the Civil Rights Act of 1964, “discrimination on the basis of race, color, or national origin” is prohibited in programs and activities receiving federal financial assistance.

Presidential Executive Order 11246

Lyndon B. Johnson, in 1965, issued executive order 11246. According to this amended presidential order, discrimination based on race, color, religion, sex, or national origin was forbidden in federal employment.

Fair Housing Act

The Fair Housing Act, which is Title VIII of the Civil Rights Act of 1968, prohibits discrimination or other unfair actions against persons, which “otherwise make unavailable or deny a dwelling to any person because of race, color, religion, sex, familial status, or national origin.” The act prohibits both intentional housing discrimination — disparate treatment — and action or policies that may not seem to discriminate but do have a negative effect on fair housing choice — disparate impact. The federal Fair Housing Act provides for a broad range of sanctions and remedies to cure existing and prevent future violations.

Architectural Barriers Act

In 1968 the Architectural Barriers Act was enacted to increase accessibility for handicapped individuals. The act “requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds [...] must be accessible to and useable by handicapped persons.”

Education Amendments Act

Title IX of the Education Amendment Act of 1972 prohibits discrimination on the basis of sex. This applies to federally funded education programs or activities.

Rehabilitation Act

The Rehabilitation Act of 1973 is a provision of the federal Fair Housing Act administered by HUD. Section 504 of the act prohibits a “refusal to make accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford them [the handicapped person] equal opportunity to use and enjoy a dwelling [...] including public and common use areas.” This act includes nearly all public activities that can adversely affect housing for handicapped people and is not limited to federally funded projects.

Housing and Community Development Act

Section 109 of Title I of the Housing and Community Development Act of 1974 protects

against discrimination when HUD funds are involved. That is, programs and activities receiving financial assistance from HUD's Community Development Block Grant Program cannot discriminate based on race, color, national origin, sex, or religion.

Home Mortgage Disclosure Act

The Home Mortgage Disclosure Act (HMDA), passed by Congress in 1975, was created in order to make loan information publicly available. HMDA mandates that information to help determine how financial institutions are responding to the housing needs be made available to local communities. HMDA also assists public officials in attracting private investors. Additionally, the Act aids in identifying discriminatory lending practices. HMDA requires the disclosure of information from banks, savings associations, credit unions, and other mortgage lending institutions. The required information includes the distribution of home mortgage and home improvement lending on a geographic and demographic basis such as the distribution of mortgage loans to minorities. More specifically, reporting requirements include data on the number, type, and amount of loans as well as the type of action taken — applications approved but not accepted, applications denied, applications withdrawn, or files closed as incomplete (<http://www.ffiec.gov/hmda/history.htm>).

Age Discrimination Act

The Age Discrimination Act of 1975 prohibits discrimination on the basis of age. This applies to federally funded programs or activities.

Community Reinvestment Act

According to the U.S. Environmental Protection Agency, lenders, developers and property owners are concerned about the cost and liabilities of cleaning up and refinancing low-to-moderate income urban neighborhoods, leading them to develop in other areas that are perceived to be less risky. The Community Reinvestment Act (CRA) was enacted by Congress in 1977, to "require banks, thrifts, and other lenders to make capital available in low- and moderate-income urban neighborhoods, thereby boosting the nation's efforts to stabilize these declining areas" (<http://www2.epa.gov/brownfields>).

The CRA applies to: federally insured depository institutions, national banks, thrifts, and state- chartered commercial and savings banks (<http://www.occ.gov/topics/compliance-ba/cra/index-cra.html>). It works to prevent redlining – discrimination by refusing to grant loans, mortgages or insurance to people in a specific area, particularly those deemed poor or to be "financial risks."

In May 1995, the Office of the Comptroller of the Currency revised the CRA to allow lenders to claim community development loan credits for loans "made to help finance the environmental cleanup or redevelopment of an industrial site when it is part of an effort to revitalize the low- and moderate-income community in which the site is located." This revision was intended to encourage economic activity in inner-city neighborhoods through financing and property redevelopment.

The CRA requires that each insured bank's record of helping meet the credit needs of its entire community be evaluated periodically (<http://www.ffiec.gov/cra/history.htm>). There are several organizations that work to promote and ensure the credibility and compliance of all lenders subject to the CRA: Office of the Comptroller of the Currency (OCC), Board of Governors of the Federal Reserve System (FRS), and the Federal Deposit Insurance Corporation (FDIC). The Office of Thrift Supervision (OTS) as of 2011 is no longer an active regulatory agency. The following active institutions are required to report data under the CRA:

- All savings associations except small institutions (those with total assets equaling less than \$1 billion in the past 2 years) regulated by the OTS.
- All state member banks, state nonmember banks, and national banks except small institutions (those with total assets less than \$250 million in the past 2 years) regulated by the FRS, FDIC, and OCC.

Amendment of the Federal Fair Housing Act

In 1988 the federal Fair Housing Act was amended to include handicapped persons among those protected; those with one or more handicaps are discriminated against when there is a failure to make reasonable modifications to residential premises which may be necessary to enable a handicapped person "full enjoyment of the premises."

Americans with Disabilities Act

Title II of the Americans with Disabilities Act of 1990 prevents discrimination against disabled persons. More specifically, public programs, services, and activities cannot discriminate based on disabilities. Further, "HUD enforces Title II when it relates to state and local public housing, housing assistance, and housing referrals."

Presidential Executive Order 12892

In 1994 President William J. Clinton issued his first presidential executive order pertaining to fair housing. The amended executive order 12892 "requires federal agencies to affirmatively further fair housing in their programs and activities."

Presidential Executive Order 12898

In 1994, President Clinton issued his next presidential executive order pertaining to fair housing. According to executive order 12898, federal agencies must conduct programs, policies, and activities that have an impact on the environment and individuals' health in a way that does not exclude anyone based on race, color, or national origin.

The Quality Housing and Work Responsibility Act

The Quality Housing and Work Responsibility Act (QHWRA), signed by President Clinton in 1998, applies to public housing and public housing voucher programs. Its purposes range from "reducing the concentration of poverty in public housing," to creating opportunities

and incentives for public housing residents to find work, to rehabilitating public housing units through the establishment of the HOPE VI program.

Presidential Executive Order 13166

In 2000, President Clinton issued his final presidential executive order pertaining to fair housing. Executive order 13166 strives to eliminate the barrier caused by poor English proficiency that would deny benefits from federally funded programs and activities.

Presidential Executive Order 13217

In 2001, President George W. Bush issued the most current fair housing-related executive order. His executive order 13217 requires federal agencies to examine their policies and programs in order to find way to improve the availability of “community-based living arrangements for persons with disabilities.”

Promoting Fair Housing and Fair Lending

U.S. Department of Housing and Urban Development

In 1965, the Department of Housing and Urban Development Act created the Department of Housing and Urban Development (HUD) as a Cabinet-level agency. The Civil Rights Act of 1968 made most types of housing discrimination illegal and gave HUD “enforcement responsibility” when dealing with fair housing practices. The official website for HUD states that the department’s primary purpose is to “promote non-discrimination and ensure fair and equal housing opportunities for all.” HUD’s main responsibilities involve “implementing and enforcing a wide array of civil rights laws, not only for members of the public in search of fair housing, but for HUD funded grant recipients as well,” and are enforced by a group of laws known as the Civil Rights Related Program Requirements, or CRRPRs.

HUD-funded grant recipients are obligated by law not to discriminate “in housing or services directly or indirectly on the basis of race, color, religion, sex, national origin, age, familial status, or disability.” According to the FHA, the Secretary of HUD “shall administer programs and activities relating to housing and urban development in a manner that affirmatively furthers the policies outlined” within sections of the Act. Some examples of these programs and activities include but are not limited to offering counseling programs, establishing fair housing enforcement organizations in areas of need, working with housing providers, and encouraging banks and lenders to use more non-traditional credit evaluation methods.

The amended Housing and Community Development Act of 1974 is the primary law for the Community Development Block Grant (CDBG) Program. Under this act, every grant recipient is responsible for assuring HUD that the grant will be carried out in a manner that affirmatively furthers fair housing. CDBG recipients are required to:

1. Examine and attempt to alleviate housing discrimination within their jurisdiction

2. Promote fair housing choice for all persons
3. Provide opportunities for all persons to reside in any given housing development, regardless of race, color, religion, sex, disability, familial status, or national origin
4. Promote housing that is accessible to and usable by persons with disabilities
5. Comply with the non-discrimination requirements of the Fair Housing Act

HUD's Super Notice of Funding Availability (SuperNOFA) provides funds to ensure that HUD and grantees work towards furthering fair housing and decreasing housing discrimination.

HUD and Fair Lending

Fair lending plays a major role in fair housing. The FHA states that it is unlawful to discriminate in the following ways based on race, color, national origin, religion, sex, familial status, or disability:

- Refuse to make a mortgage loan
- Refuse to provide information regarding loans
- Impose different terms of conditions on a loan, such as different interest rates, points, or fees
- Discriminate in appraising properties
- Refuse a loan or set different terms of conditions for purchasing a loan

HUD investigates claims of lending discrimination at no charge. "HUD has conducted a number of studies to determine whether minority homebuyers receive the same treatment and information as whites during the mortgage lending process." HUD also addresses issues such as subprime lending, predatory lending, and minority homeownership. (Source: <http://portal.hud.gov/hudportal/HUD>)

Community Development Block Grants

Entitlement Grants are awarded to urban communities on a formula basis to support affordable housing and community development activities. The Community Development Block Grant (CDBG) program is used to plan and implement projects that foster revitalization of eligible communities. The primary goal of the program is the development of viable communities. Program objectives include the provision of decent housing, a suitable living environment, and expanded opportunities principally for low- to moderate-income individuals and families. The City of Greenville receives its CDBG allocation directly from HUD. Activities include:

- Acquisition/Rehabilitation
- Homebuyer Assistance
- Homeless Assistance
- Economic Development
- Public Improvements
- Public Services

The city's community and neighborhood development activities are administered through

the Greenville Housing Division. Project eligibility is outlined in accordance to HUD program objectives, which are:

- 1) Development of urban communities including decent housing and a suitable living environment. •
- 2) Expanding economic opportunity, primarily for low- and moderate-income persons. •

In order to achieve the program objectives, each qualifying activity must meet one of the three broad National Objectives:•

- a) Primarily benefit low- and moderate-income families. More specifically, 51% of the project must benefit families with incomes at or below 80% of the median income. •
- b) Aid in the prevention or elimination of slum or blight. Activities considered to aid in the prevention or elimination of slum or blight are activities located within a designated area which: 1) meets a definition of a slum, blighted, deteriorated, or deteriorating area under State or local law; and 2) where there is a substantial number of deteriorating or dilapidated buildings or needed improvements throughout the area. •
- c) Meet urgent community development needs. The proposed project must meet needs that have a particular urgency where existing conditions pose a serious and immediate threat to the health or welfare of the community where other financial resources are not available to meet such needs. •

HOME Investment Partnership Program

The HOME Investment Partnerships Program (HOME) is authorized under Title II of the Cranston-Gonzalez National Affordable Housing Act, as amended. Program regulations are at 24 CFR Part 92. HOME “provides formula grants to states and localities that communities use – often in partnership with local nonprofit groups – to fund a wide range of activities including building, buying, and/or rehabilitating affordable housing for rent or homeownership or provide direct rental assistance to low-income people. •HOME is the largest federal block grant to state and local governments designed exclusively to create affordable housing for low-income households.”⁴ Each year it allocates approximately \$2 billion among the states and hundreds of localities nationwide.

Grantees, referred to as Participating Jurisdictions (PJs), may choose among a broad range of eligible activities using HOME funds, including but not limited to: 1) providing home purchase or assistance to new homebuyers, 2) building or rehabilitating housing for rent or ownership, 3) or for other reasonable and necessary expenses related to the development of non-luxury housing, including site acquisition or improvement, demolition of dilapidated

⁴ Housing and Urban Development, “HOME Investment Partnerships Program: FY 2016 HOME Information”

http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/affordablehousing/programs/home/

housing to make way for new HOME- assisted developments, and payment of relocation expenses.

All HOME-based housing and rental assistance must be targeted to low-income families. Jurisdictions must reserve 15% of their HOME funds for housing that is developed, sponsored, or owned by Community Housing Development Organizations (CHDOs). A CHDO is a private, community-based non-profit that has among its purposes the provision of decent, affordable housing for low-income persons.

Emergency Shelter Grant (ESG)

The Emergency Solutions Grant (ESG) is a Federal grant that was established by the Homeless Housing Act of 1986, in response to the growing issue of homelessness among men, women & children in the United States. In 1987, the ESG program was incorporated into subtitle B of title IV of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11371-11378). The ESG program is administered in North Carolina through the State Department of Health and Human Services.

The objectives of the Emergency Solutions Grant program are:

- Increase the number and quality of emergency shelter and transitional housing facilities for homeless individuals and families
- Operate these facilities
- Provide essential social services
- Help prevent homelessness

The four main ESG Program Eligible Activities are:

- Homeless Prevention
- Essential Services
- Operational and Maintenance
- Renovation, Rehabilitation, and Conversion

US Department of Agriculture (USDA) – Rural Development

The US Department of Agriculture (USDA) administers several housing programs through their Rural Development program. Community development programs are a major focus of the USDA Rural Development mission. The Rural Development programs invest hundreds of millions of dollars each year in rural North Carolina to improve the quality of life for thousands of individuals through housing; upgrades to rural electric services, water, and wastewater services; community facilities programs; renewable energy and energy efficiency; business and cooperative development; and job creation. The USDA Rural Development program assists families and individuals in North Carolina with their need for decent, safe, sanitary, and affordable housing. Single Family Housing (SFH) programs administered by USDA offer homeownership and home improvement loans and grants for individuals and families in rural areas. The nearest USDA Rural Development office is located in Cedar City in neighboring Iron County and can be reached at (435) 586-7274.

Housing Opportunities for Persons with AIDS (HOPWA)

The Housing Opportunities for Persons with AIDS (HOPWA) program is designed to provide housing assistance and supportive services for low-income people with HIV/AIDS and their families. HOPWA has been successful in helping organizations work with individuals with HIV/AIDS and their families to deal with crisis management, illness, and the depletion of finances. Funding may be used for a range of activities including: housing information services, resource identification, project- or tenant-based rental assistance, short-term rent, mortgage and utility payments to prevent homelessness, housing and development operations, and supportive services. In North Carolina, the State Health and Human Services oversees the HOPWA program and contracts with community partners to implement the program at the local level.

Low Income Housing Tax Credit Program

The Low-Income Housing Tax Credit Program (LIHTC) was created by the 1986 Tax Reform Act and is designed to provide an incentive to owners developing multifamily rental housing. The Internal Revenue Service and North Carolina Housing Finance Agency jointly administer the LIHTC program in North Carolina. Developments that may qualify for credits include new construction, acquisition with rehabilitation, rehabilitation, and adaptive reuse.

Owners of and investors in qualifying developments can use the credit as a dollar-for-dollar reduction of federal income tax liability. Allocations of credits are used to leverage public, private, and other funds to keep rents to tenants affordable.

Candidates eligible for Tax Credits include: individuals, partnerships, corporations, for-profit or nonprofit organizations, and other legal entities. Eligible applicants must submit proposals to be ranked in accordance with the Qualified Allocation Plan (QAP). Authority staff will evaluate all applications for LIHTCs to determine if the proposed development meets the State's housing need priorities.

Eligible developers must submit proposals to be ranked in accordance with the QAP. That ranking is based on housing need, priorities and other criteria. The evaluation will also ensure a development does not receive more tax credits than are needed for it to be financially feasible.

Developers must comply with federal guidelines governing tenant income. To be eligible, a development must have at least 20% of its units occupied by households earning at or below 50% of the area median income, or 40% of its units occupied by households earning at or below 60% of the area median income.

Protected Groups

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 Greenville City, however approximately 41.7 percent of households in the City that have extremely low incomes (0-30% AMI) are Black. Also, 43.5 percent of households that are very low income (0-50% 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 residents who identify as Black are more common in publicly supported housing than other racial groups.

Black households are more concentrated in public housing (98.2%), Project Based Section 8 (74.3%), Other Multifamily (60.5%) and almost all HCV Program (96.5%) participants than the percentage of Black households the general population (34.6%). On the other hand, Hispanics accounted for 3 percent of households and Asians accounted for 2.4 percent of the households 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).

In comparing protected groups (elderly, disability, race and familial status) to the general population in Greenville with regards to the population in publicly supported housing, persons who are elderly, disabled, Blacks, 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 – Demographics, elderly 65 and over made up approximately 8.8 percent of the population in Greenville. While elderly made up 8.8 percent of the population in the City, the group accounted for a larger percentage of the residents in most publicly supported housing categories.

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). 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 less 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 HCV 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.

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). 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 – Demographics, Blacks made up approximately 35.7 percent of the population in Greenville. While Blacks made up 35.7 percent of the population in the City, the group was overrepresented in all publicly supported housing categories.

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). 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). However Public housing development units 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>								

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%, 0-50% and 0-80% 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 less 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 the residents in Public Housing developments (98.2%) and the HCV program (96.5%). 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%, 0-50% and 0-80% 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%).

Publicly Supported Housing and Income Eligibility: Hispanic Households

Hispanic households made up less 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%, 0-50% and 0-80% 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

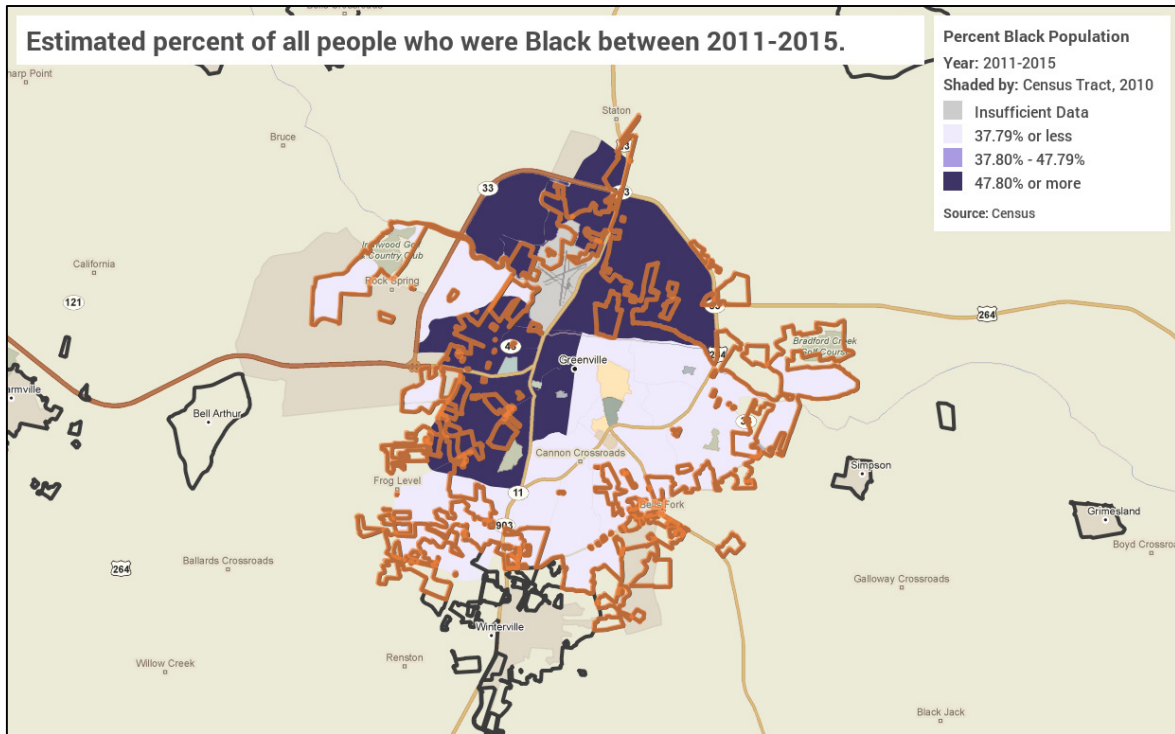
Asian households also generally made up 1 percent or lower of all publicly supported housing categories. With a few exceptions, this was also generally lower than the percentage of Asian households for each low- and moderate-income category (0-30%, 0-50% and 0-80% AMI) in the City. Asian households made 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 there were only 6 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)

Publicly Supported Housing Location and Occupancy

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



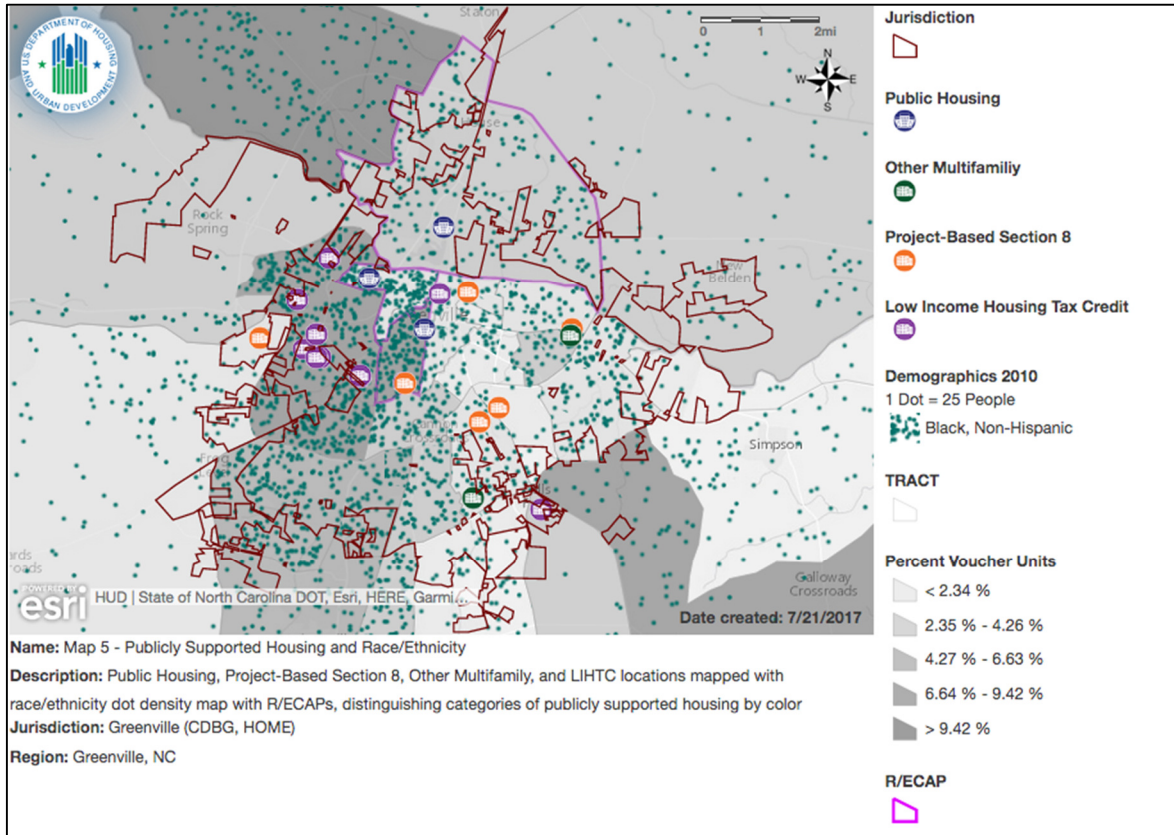
Source: 2011-2015 ACS via PolicyMap

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 Dr. in Census Tract 37147000701 and Hopkins Park on Moore St. 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 less people living in the tract – meaning there are also less 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 is a large number of the Black population. (Data Source: HUD AFH Map 5)

Project-Based Section 8

Project-based Section 8 housing units can be found more spread out throughout the City; however, they are also located in areas where there is a concentrated Black population. There is a Section 8 housing unit located in R/ECAP tract 37147000702 (Carolina Cove Apartments on Lakeview Terrace).

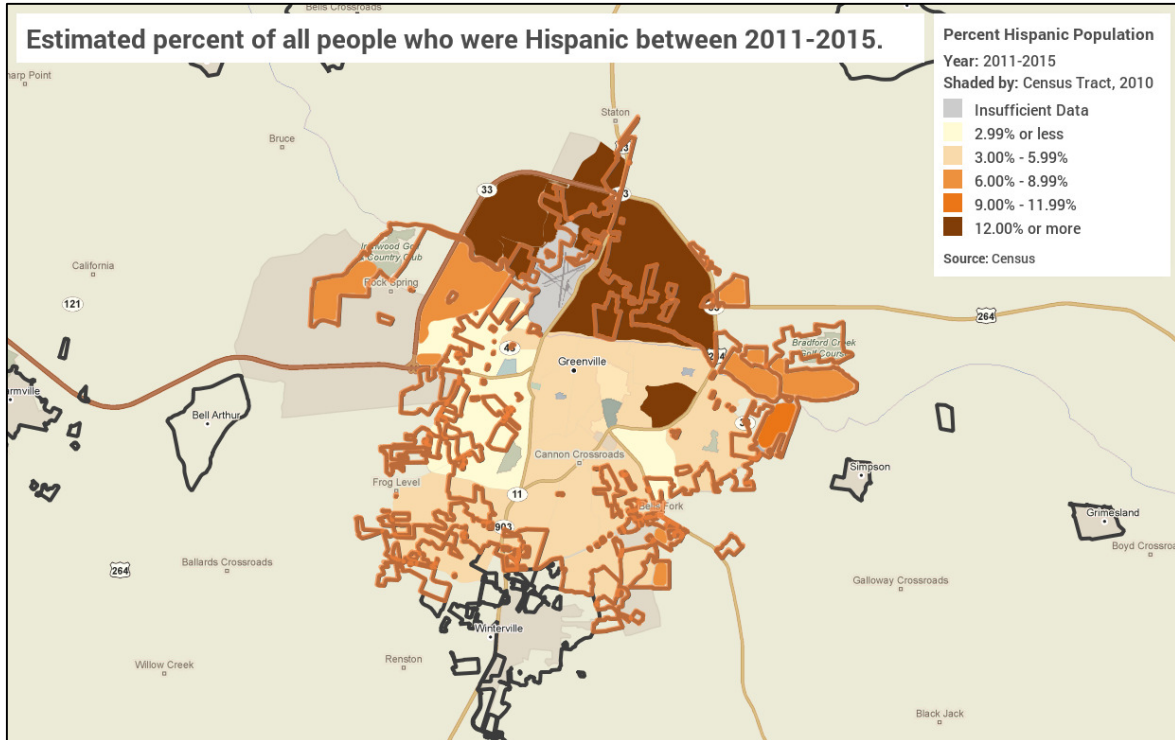
Low Income Housing Tax Credit and Other HUD Multifamily Units

LIHTC housing is concentrated on the western tracts of the City and are also in close proximity to areas where there is a concentrated Black population. Other HUD Multifamily housing units are located on the eastern side of the City where there is a lower concentrated Black population. This partly explains why there are less Black households residing in that housing category than the other housing category types.

Hispanics and Publicly Supported Housing

According to HUD Table 1 – 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.

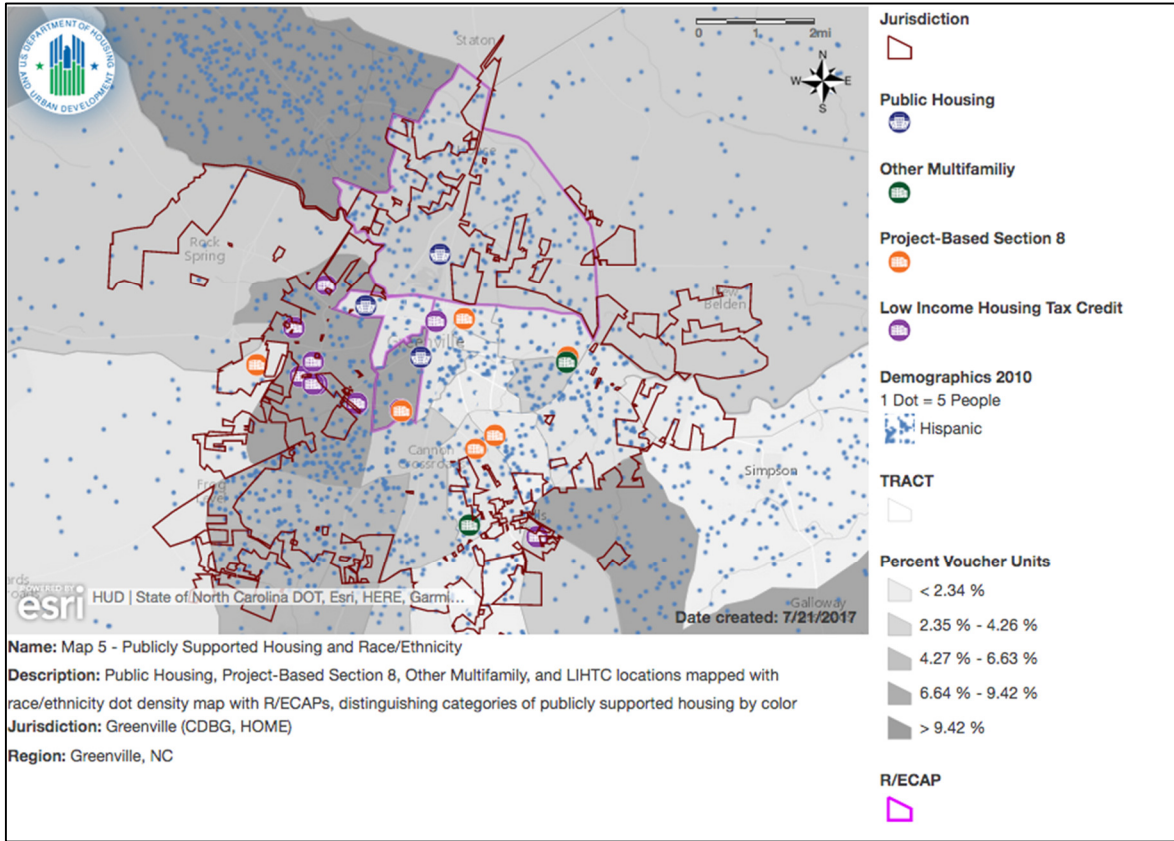
MAP – Hispanic Population



Source: 2011-2015 ACS via PolicyMap

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

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



Source: HUD

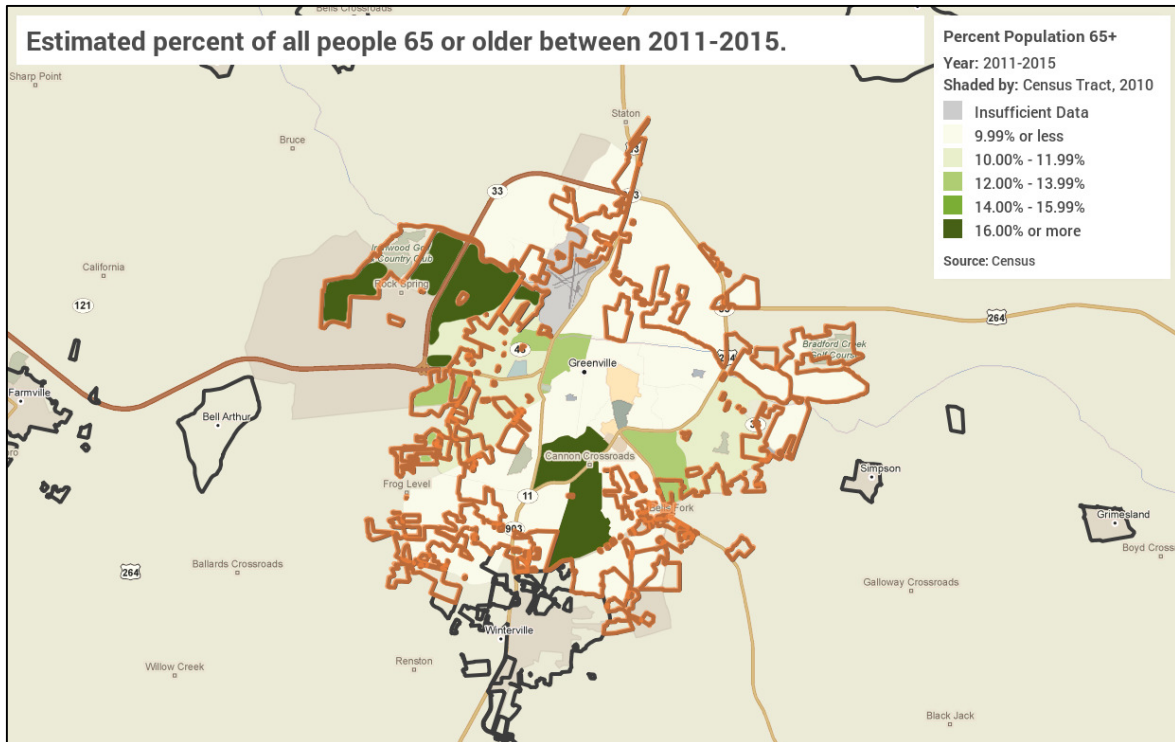
Geographic Location of Publicly Supported Housing

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

Elderly

Elderly 65 years and over 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 Blvd SW and up and down 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). In 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. However, in non-R/ECAP tracts, they were 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. However, families with children made up 58.8 percent of program participants in R/ECAP tracts.

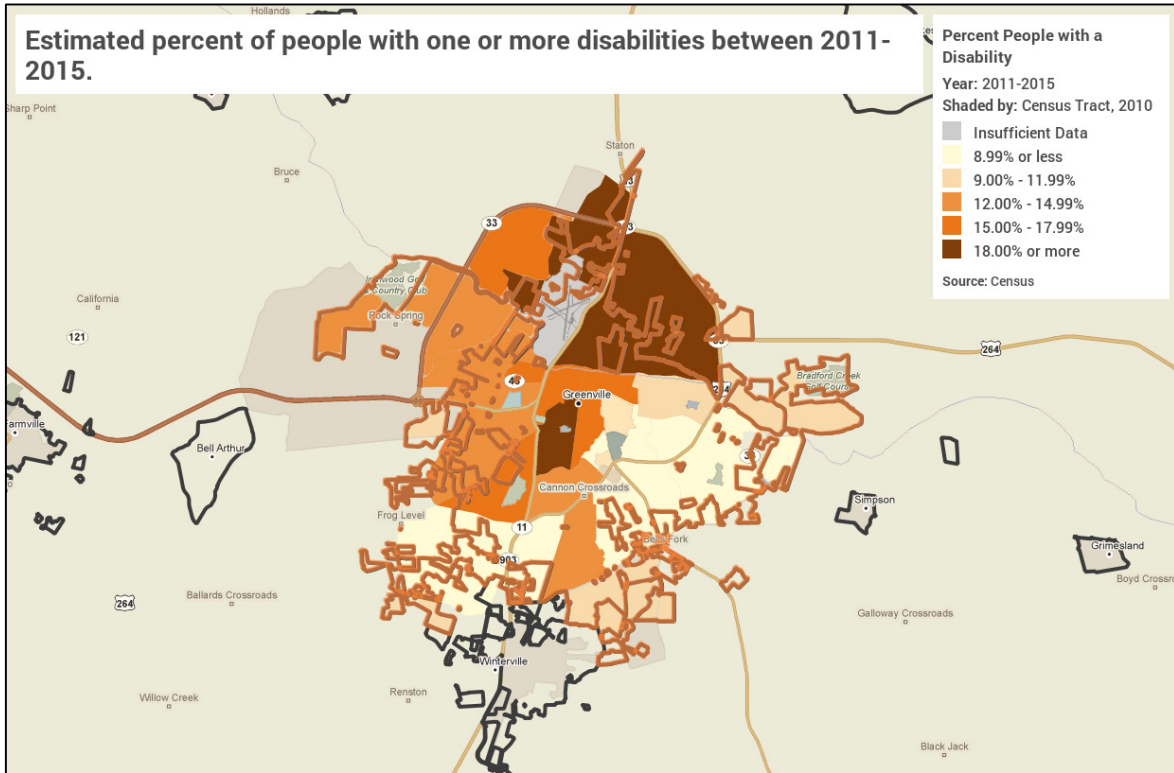
There were no families with children in Other HUD Multifamily units as these are generally reserved for elderly residents or individuals with a disability. (Data Source: HUD AFFH Table 7 - R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category)

Disability

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

Publicly supported housing is concentrated in the northeast area of the City where there is a large percentage of 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

Publicly Supported Demographic Comparison (R/ECAPs and non-R/ECAPs)

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.

In contrast, Blacks have 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%), than in non-R/ECAP tracts (10.6%). (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 have 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.

RAD and LIHTC Demographic Composition

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 less 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 higher of the development's residents, which is higher than the City's rate of 46.9 percent. One percent or less 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 was 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	GHA	228	1%	96%	1%	N/a	64%
Kearney Park	NC022	GHA	238	1%	99%	0%	N/a	55%
Hopkins Park	NC022	GHA	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>								

Additional Information

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

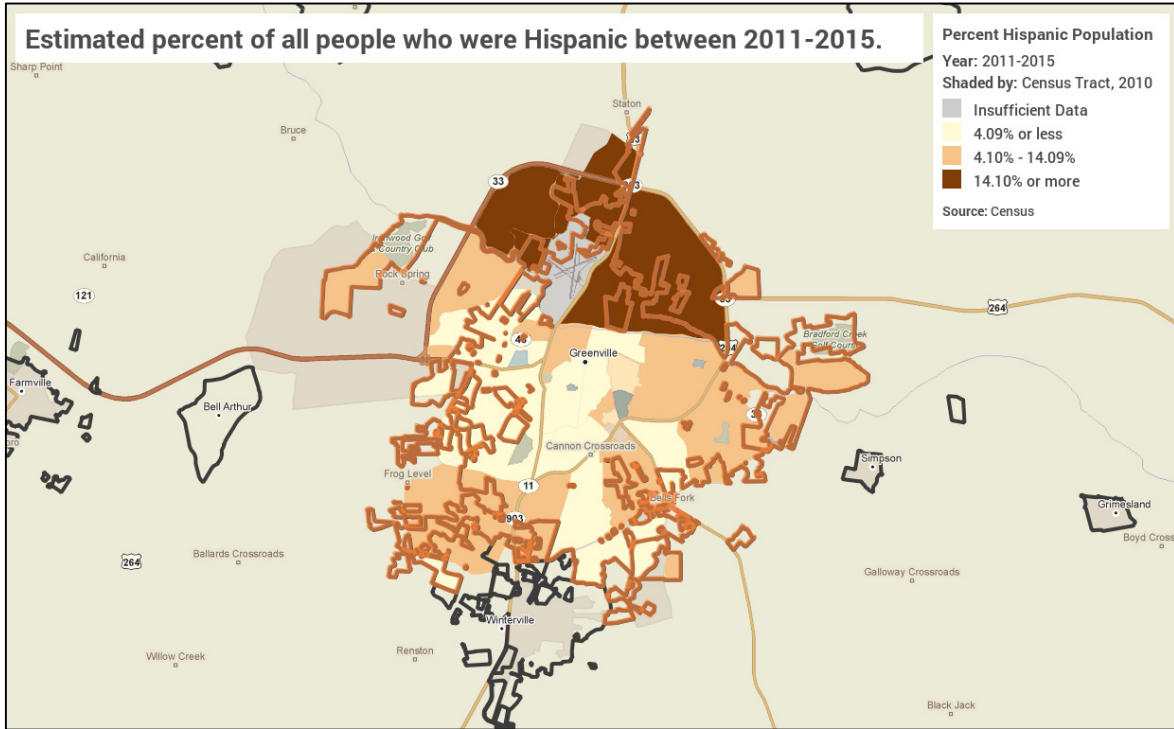
Black Households in the HCV Program

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%). 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 less than half of a percent of HCV Program participants however they made up 3 percent of the households in the City. HCV Program usage was also sparse in areas where there was a higher concentration of individuals that 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

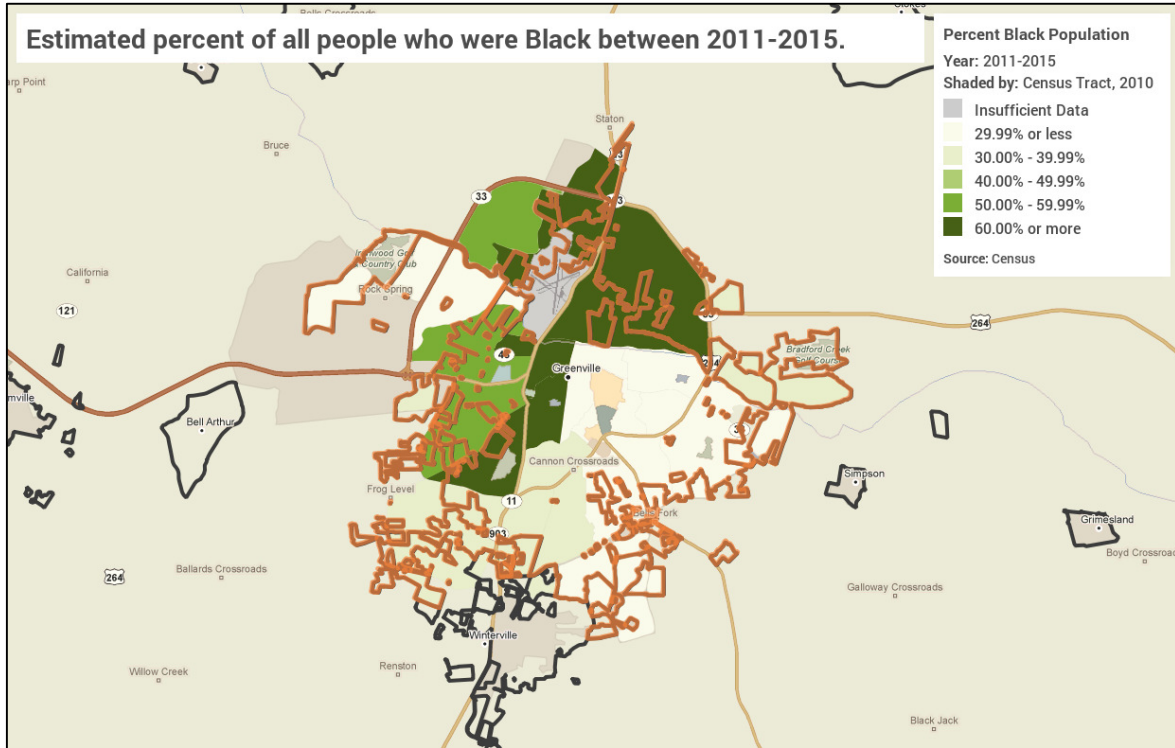


Source: 2011-2015 ACS via PolicyMap

Demographic Comparison by Publicly Supported Housing Categories

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. Over 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 have 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, more elderly and more persons with a disability residing in the public housing developments than each of these protected groups among the general population. In public housing development units, families with children were 57.4 percent, while families with children were 46.9 percent of the family type among the general population in the City. Elderly were 23.3 percent of the residents in the units,

however elderly were only 9 percent of the general population. Persons with a disability were 16.9 percent of the residents in the units, while they were 10.6 percent of the general population.

Project-Based Section 8

Project-based Section 8 housing can be found spread 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 displaying 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 however data was not 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%). 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)

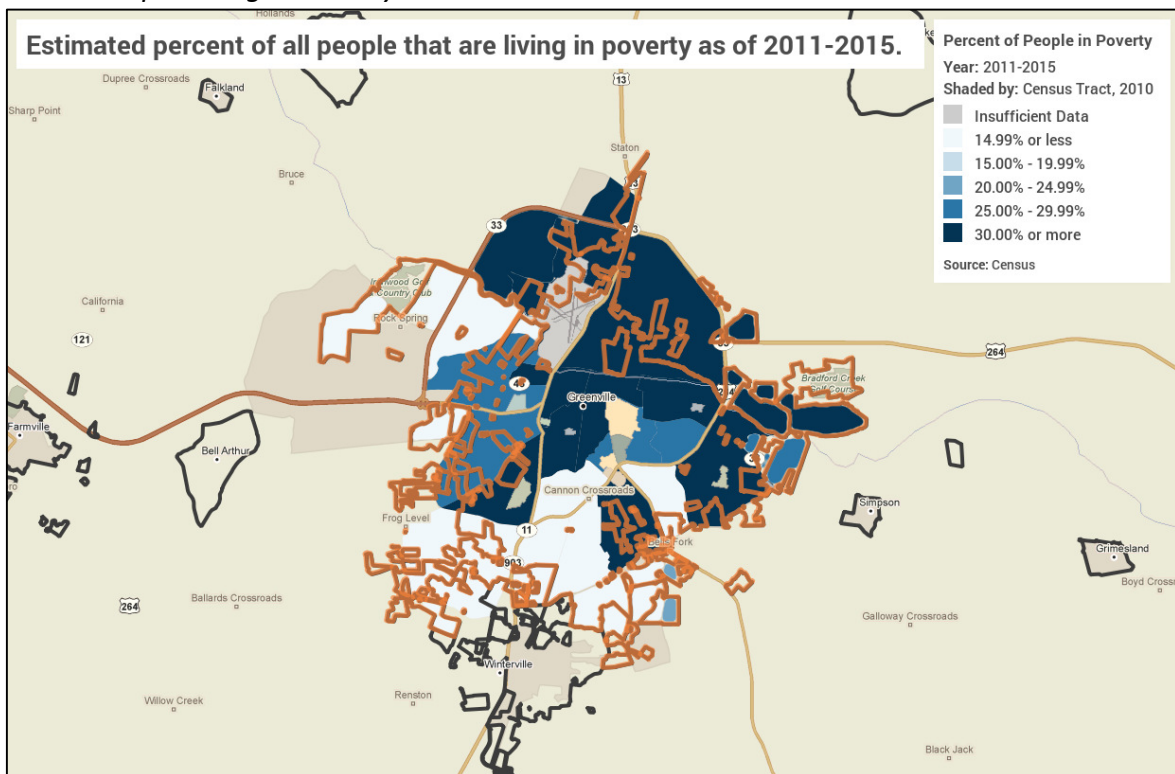
Disparities in Access to Opportunity

Access to High Wage Jobs

Based on the HUD AFH Maps, areas where there is a concentration 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 distances 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 were also 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

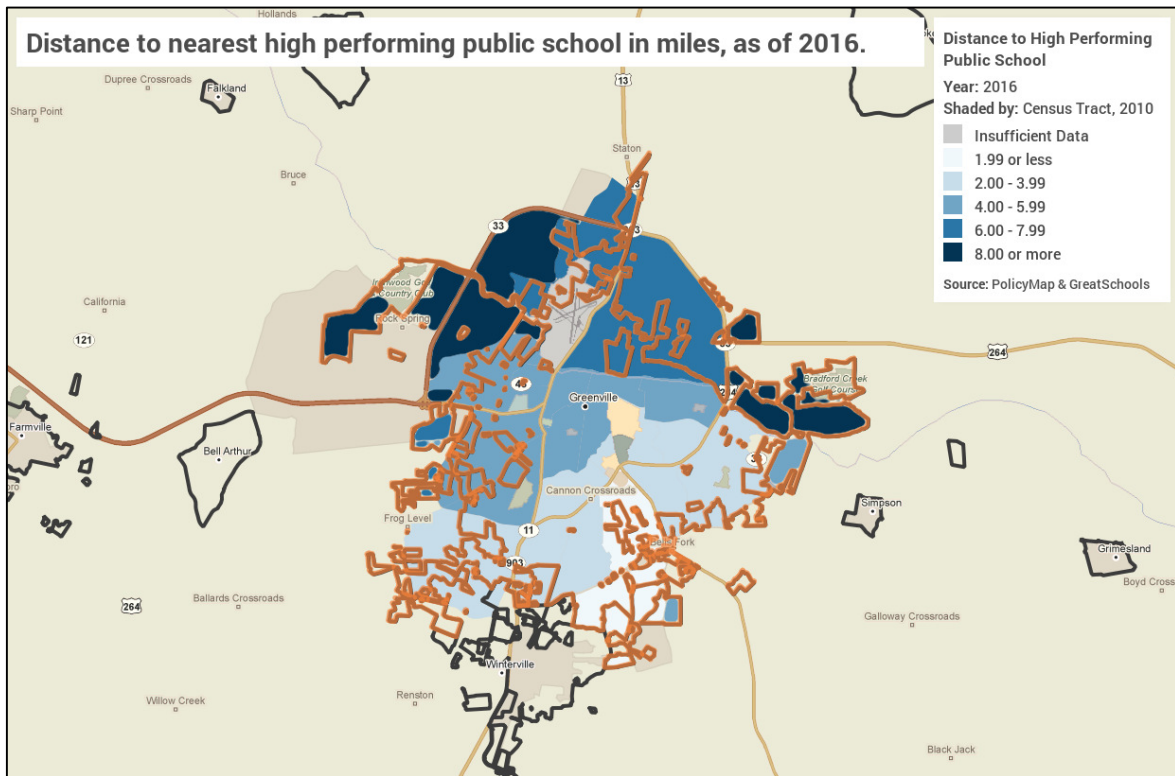


Source: 2011-2015 ACS via PolicyMap

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 over had a Bachelor's degree or higher, which is 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 elementary and high school. 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 as high performing or low performing and 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 8 or better, orange markers are average performing schools of 4-7, and red markers are the lowest performing schools with a rating of 3 or lower. Gray markers have no ranking. Schools are categorized into elementary, middle and high schools.

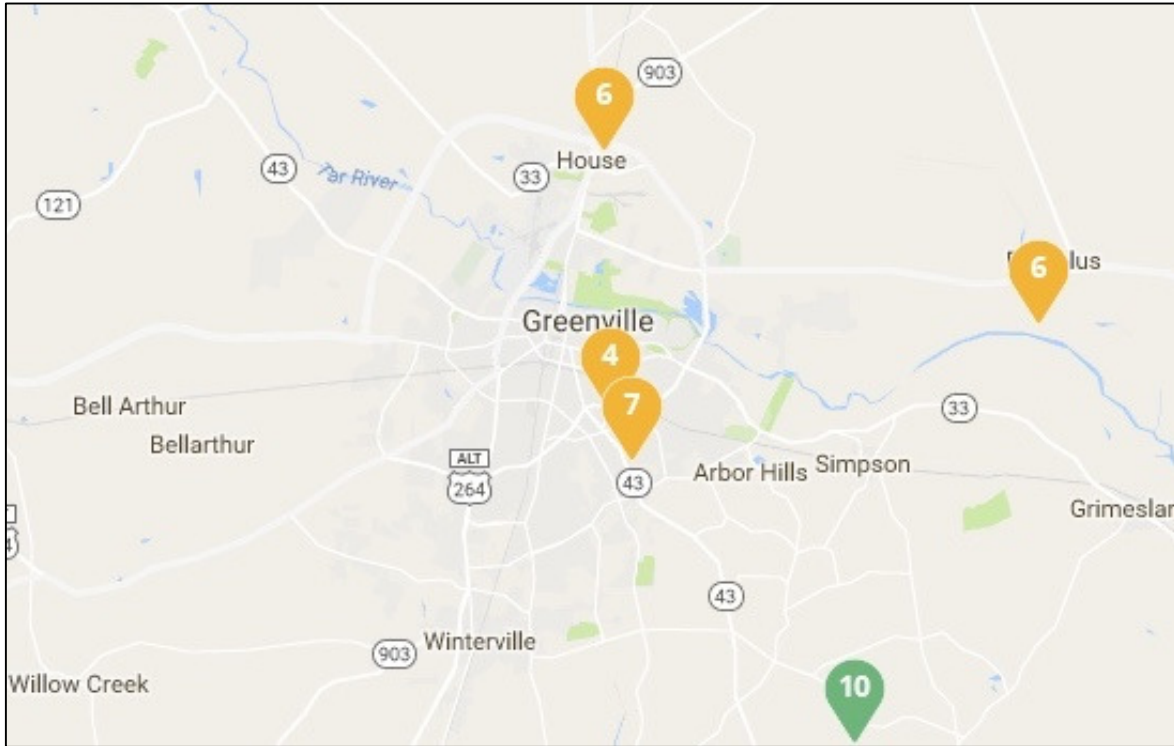
Elementary High/Low Performing Public Schools



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

There are no low performing public middle schools in the City, however there are also no 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 schools. While there were no low performing public high schools in the City, there are also no high performing public high schools in the area.

There is a general lack of high performing public schools in the northwest area of the City. The correlation between the lack of high performing schools and the location of where the highest percentage of the Black population resides points to indicators of why Blacks have less high levels of educational attainment in the City as compared to the general population.

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

Additional Information

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 with regards 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.”⁵

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. However, 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, in 2010, 142 family households were same-sex couple households in Greenville. This puts the group at 3.93 same-sex couples per 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

⁵ Ending Housing Discrimination Against LGBT and their Families, www.hud.gov, 2016

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, with many of these individuals 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 individuals with criminal records, even those who were convicted but not incarcerated face significant barriers such as 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.⁶

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 ongoing ignorance by uneducated persons on the virus. According to the center, stigma exists not only individually, but also across the broader social and cultural contexts, and still requires widespread and significant education efforts to combat it.

In regard to publicly supported housing, individuals with HIV/AIDS and their families are protected under HUD's Equal Access Rule, meaning low-income persons with HIV/AIDS and their families may pursue public housing without discrimination and may be allowed reasonable accommodations for housing options. It is not limited to public housing, as persons with HIV/AIDS are also protected against discrimination in the sale and rental of housing and residential real estate. Furthermore, 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.

⁶ 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

In 2015 the Greenville Housing Authority (GHA) was provided funding to support 19 persons who were diagnosed with Acquired Immune Deficiency Syndrome (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.

Greenville Housing Authority Programs

GHA 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 the GHA:

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 GHA 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 GHA'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.

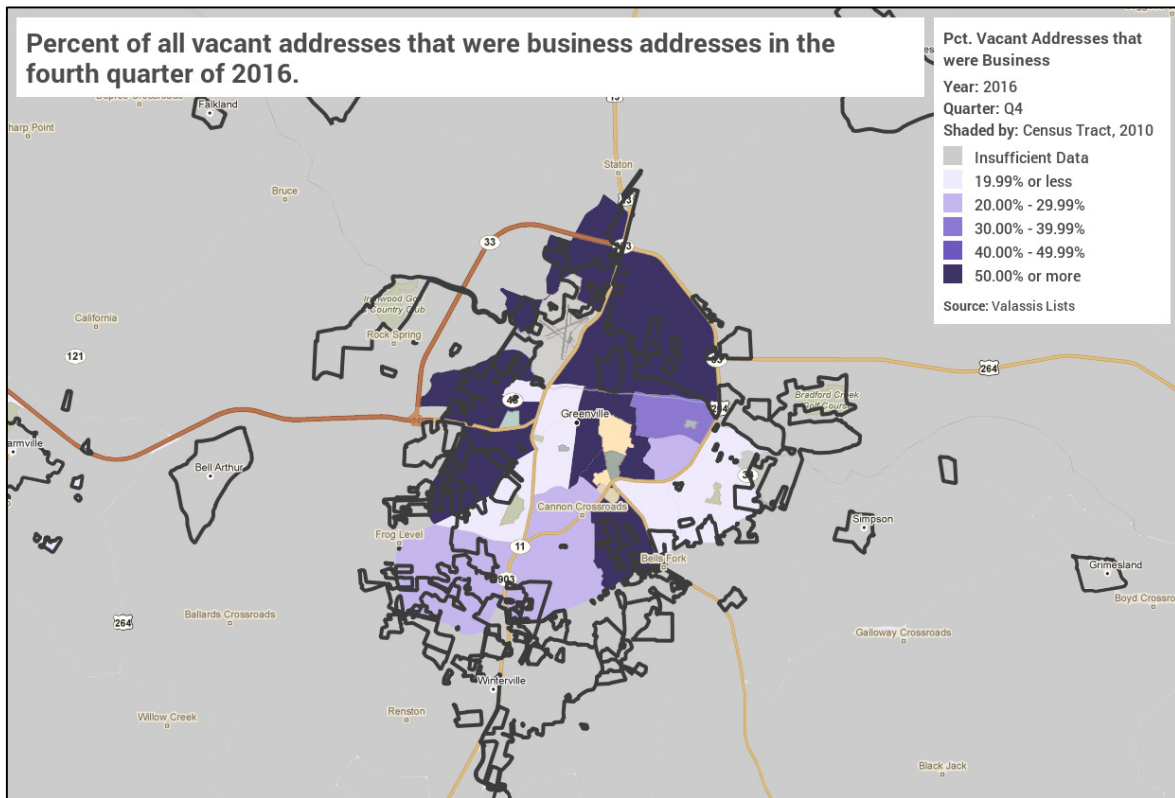
Lack of Private Investments in Areas with LIHTC Housing & HCV Program Usage

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

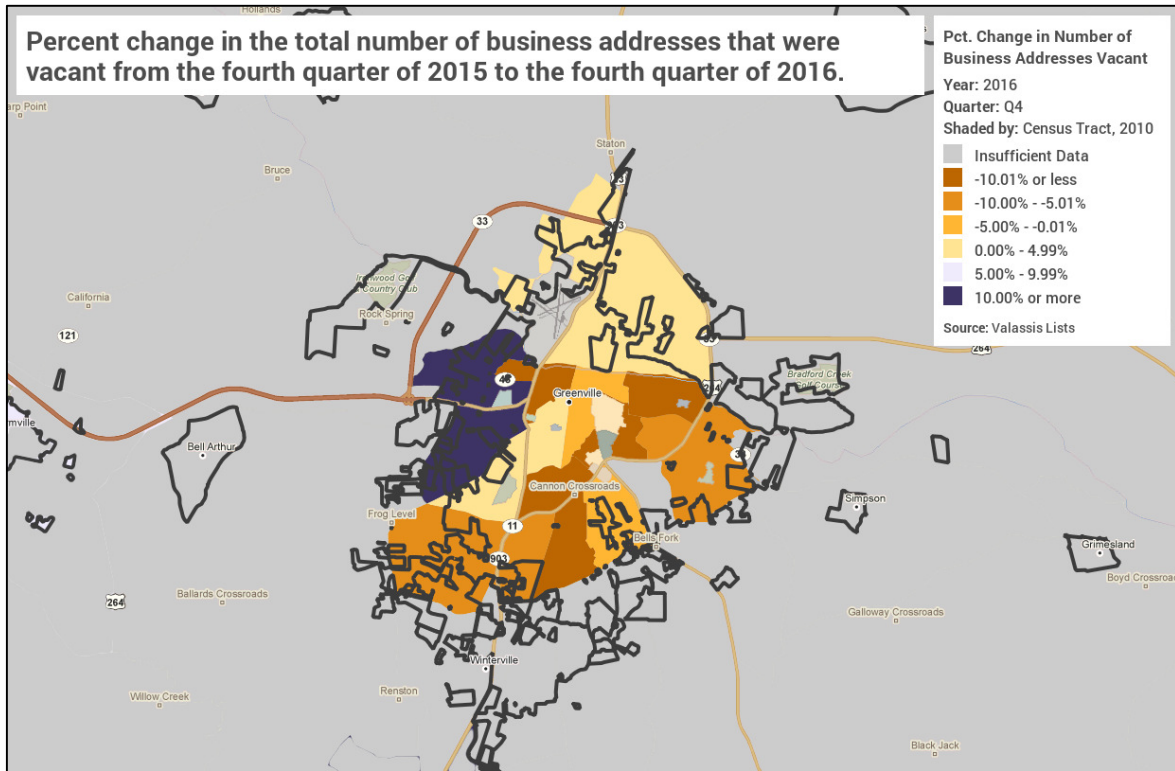


Source: Valassis Lists 2016 via PolicyMap

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.

Contributing Factors-of Publicly Supported Housing Location and Occupancy

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% AMI), 220 low-income (0-50% AMI), and 595 moderate-income (0-80% 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 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.

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.

Fair Housing

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:

(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

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

loan application which inquires 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.

Fair Housing Complaints

Currently, there are no outstanding fair housing complaints against the City of Greenville. According to data from HUD, two complaints have been filed against parties within Greenville since 2012. Both of these complaints were disability-related cases.

Case Number	City	Filing Date	Closure Date	Closure Reason	Bases	Issues
04-15-0996-8	Greenville	8/25/15	1/12/16	No cause determination	Disability	Discriminatory refusal to rent Discrimination in terms/conditions/privileges relating to rental Failure to make reasonable accommodation
04-15-1127-8	Greenville	9/23/15	2/5/16	No cause determination	Disability	Discriminatory refusal to rent Discrimination in terms/conditions/privileges relating to rental

Fair Housing Agencies

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.

Greenville Housing Authority (GHA): GHA is the local public housing authority and operates and manages the public housing developments and HCV Program. GHA strictly adheres to federal and local fair housing laws and in accordance with ADA requirements. GHA 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 between all the 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 these 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.

NIMBY (Not in My Backyard)

Opposition by local residents to new developments that may be needed by the overall community, but may be considered unattractive for various reasons is often referred to as NIMBY (Not in My Backyard). In regard to fair housing, NIMBY can create a barrier to the development of certain housing types (e.g. units that are affordable to middle- to low-income residents).

Development of affordable housing is widely seen as a necessary need for the larger community, however local residents may oppose affordable housing projects for fear that it may have adverse effects on the area, including lowering property values, creating added living costs, and, in some cases, increasing crime in the area. In protecting the interest of the local residents from new affordable housing development projects, the result is that NIMBY becomes another barrier to fair housing, limiting low-income residents another opportunity to find affordable housing.

New HUD Fair Housing Guidance

Guidance on Application of Fair Housing Act Standards to the Use of Criminal Records⁸

The Fair Housing Act prohibits discrimination in the sale, rental, financing of dwellings and in other housing-related activities on the basis of race, color, religion, sex, disability, familial status or national origin. In April 2016, HUD's Office of General Counsel issued guidance on the discriminatory effect of using criminal history to make housing decisions. If a policy or practice that restricts access to housing on the basis of criminal history has a disparate impact on a protected class (whether or not that effect is intentional), it is in violation of the Fair Housing Act – unless there is a “substantial, legitimate, nondiscriminatory interest” served by the policy.

Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity

While the Fair Housing Act prohibits housing discrimination based on race, color, national origin, religion, sex, disability, and familial status (i.e. presence of children in the household), the Act does not specifically include sexual orientation and gender identity as prohibited bases. However, a lesbian, gay, bisexual, or transgender (LGBT) person's experience with sexual orientation or gender identity housing discrimination may still be covered by the Fair Housing Act. In addition, housing providers that receive HUD funding or have loans insured by the Federal Housing Administration (FHA), as well as lenders insured by FHA, may be subject to HUD program regulations intended to ensure equal access of LGBT persons.

As HIV/AIDS disproportionately affects the LGBT community, it is important to note that HIV/AIDS is protected under the Fair Housing Act as a disability. HUD specifically states that housing discrimination because of HIV/AIDS is illegal.

The HUD Office of Policy Development and Research conducted a study in 2013, *An Estimate of Housing Discrimination Against Same-Sex Couples*, as the first large-scale, paired-testing study to assess housing discrimination against same-sex couples in metropolitan rental markets via advertisements on the Internet. Two emails were sent out, with the only difference between the two emails was the sexual orientation of the prospective renting couples. The study finds:

“[... same-sex couples experience less favorable treatment than heterosexual couples in the online rental housing market. The primary form of adverse treatment is that same-sex couples receive significantly fewer responses to e-mail inquiries about advertised units than heterosexual couples. Study results in jurisdictions *with* state-level protections against housing discrimination on the basis of sexual orientation unexpectedly show slightly more adverse treatment of same-sex couples than results in jurisdictions *without* such protections.”⁹

⁸ U.S. Department of Housing and Urban Development. “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,” April 4, 2016.

https://portal.hud.gov/hudportal/documents/huddoc?id=HUD_OGCGuidAppFHASandCR.pdf

⁹ HUD Office of Policy Development and Research, *An Estimate of Housing Discrimination Against Same-Sex Couples*, June 2013

Additional Information

Listed below are the primary agencies and organizations which 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

There also is private activity at the state level. 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 their 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.

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 CD Week the City. In this week, there is a tour for Elected Officials, 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 at this time.

- 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. There is advertisement of fair housing mediation services and distribution of print materials to local merchants and residents advertising fair housing workshops and mediation services in the City.
- 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 presents a Fair Housing Analysis update 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 aid 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.

Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

The ***lack of resources for fair housing agencies and organizations*** 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 over a decade, however segregation and poverty continues 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, which includes a unique 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. ▪

Fair Housing Issues & Goals

Through the process of this Analysis of Impediments to Fair Housing Choice, using the AFH framework, 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 towards the Fair Housing Issue. Overall, the highest priority of all the Contributing Factor 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.

Goal: 1 Increase Access to Affordable Housing

Housing cost-burden and a lack of affordable housing options are pervasive problems in Greenville, and the data indicate that this burden disproportionately falls on certain populations, especially low-income Black and Hispanic households. Blacks and Hispanics experience higher rates of poverty, earn lower incomes, and have significantly lower rates of homeownership than their white neighbors.

As income is one of two major variables comprising 'affordable' housing (the other being housing supply), systematically earning lower incomes makes the attainment of housing more difficult to attain across the board – a major barrier to fair housing choice. Indeed, a person or household cannot be said to have any meaningful degree of choice when the options available to them are systematically limited from the start. Not being able to attain safe and decent housing at affordable rates because of belonging to a group that has historically and systemically had lower access to economic opportunities, and as a result earned lower incomes, means that the housing problem of cost burden disproportionately falls on these groups.

The city's community development and fair housing efforts have long targeted increasing access to affordable housing, particularly among the populations that experience disproportionate housing needs. Of course, a blanket policy of simply providing affordable housing cannot alone solve all fair housing issues, but it is not meant to. By increasing access to affordable housing, especially amongst those populations experiencing disproportionate housing needs, these efforts are part of a focused and multifaceted set of goals overall strategy towards building a strong foundation that makes chips away fair housing issues in a meaningful way from multiple angles.

Furthermore, strategy 1d. aims to increase mobility-based counseling efforts in all of the city's affordable housing programs - such as educating TBRA and Down Payment Assistance program participants in the ability and benefits of living in high-opportunity areas.

Goal #1	Contributing Factors	Fair Housing Issues	Strategy	Measurement of Achievement
<p>Increase Access to Affordable Housing with a Focus on Increasing Mobility and Alleviating Disproportionate Needs</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>1d. Increase mobility-based counseling efforts in all affordable housing programs, such as educating TBRA and Down payment Assistance program participants in the ability and benefits of living in high-opportunity areas.</p>	<p>1a.1 Formally establish the Working Group by end of Year 2.</p> <p>1a.2 Development and publish 3 meaningful recommendations by end of Year 3.</p> <p>1b.1 Formally establish the TBRA Program by end of Year 2.</p> <p>1b.2 Disseminate 10 TBRA vouchers by end of Year 3.</p> <p>1c.1 Assist 1 persons per year for the coming five program years achieve homeownership through down payment assistance</p> <p>1d. Increase number of program participants moving to high-opportunity areas.</p>

Goal 2: Reduce Substandard Housing

While increasing access to affordable housing and increasing mobility-based strategy education is a viable spoke in the city's wheelhouse of tools to combat fair housing issues, not every resident is able or interested in leaving their long-term homes and communities. This goal and set of strategies is aimed at improving the quality of the housing stock throughout the city, and is also part of an overall place-based initiative aimed at increasing investment in RECAPs - improving living conditions and upgrading the housing stock in areas of high need. Substandard housing is an issue that plagues the city's RECAPs at rates much higher than more affluent areas, placing a disproportionate need on the low-income minority populations that tend to be overrepresented in these areas. Strategy 2b directly addresses improving living conditions in R/ECAPS, a strategy aimed at relieving disproportionate housing needs of those living in these underserved and historically segregated areas.

Goal #2	Contributing Factors	Fair Housing Issues	Strategy	Measurement of Achievement
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	2a. Rehab substandard homes 2b. Focus on rehabbing substandard in R/RECAP	2.a Rehab 3 homes per year for the coming five program years. 2.b At least 1/3 of rehabs to take place in R/ECAP tracts.

Goal 3: Increase Employment Training and Employment Opportunities

This goal aims to address disparities in opportunity, the effects of segregation, and disproportionate needs by providing job training and financial literacy training to populations that experience low access to opportunities. As the analysis in Section V indicates, Blacks and Hispanics in Greenville -particularly those residing in the city's R/ECAPs - lag across almost all socioeconomic indicators when compared to the city as a whole, and especially when compared to Whites. They experience higher poverty, higher unemployment, lower educational attainment, lower incomes, and carry a disproportionate amount of the burden when it comes to Greenville's housing problems.

All of these variables are interlinked and interdependent, and intertwined with fair housing choice in that a sufficient income (as well as having the knowledge and skills to properly manage that income) is a prerequisite to obtaining adequate housing. As income drops a household's options for housing drop in tandem – in terms of the size and quality of the housing unit, and in terms of location. Furthermore, the location of housing highly influences access to quality education, creating a feedback loop that has the potential to have negative impacts across generations. Residing in an area with lower performing schools because one cannot afford to live elsewhere statistically leads to lower educational attainment in the long run. In turn, educational attainment is highly correlated with employment and income – contributing to a self-sustaining cycle.

Comparing the Jobs Proximity Index Map to the Labor Force Participation map shows a clear need for increased employment training in the city's R/ECAPs. The Jobs Proximity Index Map shows that residents of R/ECAPs live close to jobs and economic opportunities, but labor force participation in these areas is amongst the lowest in Greenville – pointing to a clear disconnect in between job skills and opportunities in these areas. Training and education is an important strategy in reversing this trend.

By increasing employment training and employment opportunities for vulnerable populations, especially amongst those in the city's R/ECAPs, this goal takes meaningful action at affirmatively furthering fair housing by combating one of the leading socioeconomic contributing factors. This can be seen in Strategies 3a, 3b, and 3c, particularly in Measurements of Achievement 3a.2, 3a.3, 3b.2, 3b.3, 3c.2, and 3c.3.

Goal #3	Contributing Factors	Fair Housing Issues	Strategy	Measurement of Achievement
<p>Increase Employment Training and Employment Opportunities</p>	<p>Lack of public investments in specific neighborhoods; Location of employers; Lack of private investments in specific neighborhoods</p>	<p>Segregation; R/ECAPs; Disproportionate Housing Needs; Publicly Supported Housing, Disparities in Access to Opportunities</p>	<p>3a. Increase financial literacy through increased partnership with Literacy Volunteers of America</p> <p>3b. Increase job training programs for vulnerable populations through partnership with STRIVE.</p> <p>3c. Increase city financial literacy training</p>	<p>3a.1 Train 20 people per year for the next five years in financial literacy</p> <p>3a.2 Increase outreach in R/ECAP tracts</p> <p>3a.3 Train 10 people from R/ECAP tracts per year in financial literacy</p> <p>3b.1 Provide job training for 5 people per year for the next five years</p> <p>3b.2 Increase outreach in R/ECAP tracts</p> <p>3b.3 Provide job training for 10 people from R/ECAP tracts per year</p> <p>3c.1 Provide literacy training for 10 people per year for the next five years</p> <p>3c.2 Increase outreach in R/ECAP tracts</p> <p>3c.3 Provide financial literacy training for 5 people from R/ECAP tracts per year</p>

Goal 4: Increase Economic Development Activities & Investments

This goal and set of strategies aim to increase economic development in areas that suffer from historical segregation patterns that experience disproportionate housing needs by increasing both public and private investment in R/ECAPs. By better linking community development and economic development efforts, and increasing coordination between the two, the goal is to increase the amount of economic development investment in areas identified by community development initiatives as in need of investment. The city has a number of impressive economic development initiatives but those initiatives could have more impact in underserved areas by strategically investing in R/ECAPs specifically. Additionally, these efforts could impact fair housing issues more broadly by incorporating aspects of economic development projects located in high opportunity areas that directly target and benefit low-income minority populations, such as inclusion of affordable housing units and job training and education initiatives targeted at these populations.

This broad economic development strategy is one piece of a multifaceted approach that aims to have synergistic effects by creating positive feedback loops. For example, increasing public investment - both from economic development efforts as well as community development efforts such as reducing substandard housing (goal 2) and beautifying these areas – will build momentum and eventually attract private investment. Increasing employment training (goal 3) prepares those living in R/ECAPs for the increased employment opportunities brought about by economic development efforts, and so on.

Goal #4	Contributing Factors	Fair Housing Issues	Strategy	Measurement of Achievement
<p>Increase Economic Development Activities & Investments</p>	<p>Lack of public investments in specific neighborhoods; Location of employers; Lack of private investments in specific neighborhoods</p>	<p>Segregation; R/ECAPs; Disproportionate Housing Needs; Publicly Supported Housing</p>	<p>4a. Increase economic development activities that benefit low-income minority residents</p> <p>4b. Increase coordination between community and economic development departments.</p> <p>4c. Facilitate for the inclusion of affordable housing in new economic development projects.</p>	<p>4a.1 Amount of economic development spending that benefit low-income minority residents.</p> <p>4a.1 Amount of economic development spending on projects directly located in R/ECAPs.</p> <p>4b.1 Amount of economic development spending on projects directly located in R/ECAPs.</p> <p>4c.1 Number of affordable units in new economic development projects.</p> <p>4c.2 Number of affordable units in new economic development projects located in R/ECAPs.</p>

Goal 5: Increase Fair Housing Awareness and Education

This goal aims to increase education among residents of Greenville with regards to Fair Housing issues. It is imperative that residents are aware of their legal rights and options when it comes to housing. When residents are unaware of their rights it can exacerbate segregation and reduce enforcement of fair housing laws. The city plans on holding multiple fair housing events for residents with a particular emphasis for those living in R/ECAP tracts.

Goal #5	Contributing Factors	Fair Housing Issues	Strategy	Measurement of Achievement
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 2 per year for the next five years. 5b1: Increase the number of participants from R/ECAP tracts to 20 every year 5b2: Hold at least 1 fair housing education events in a R/ECAP tract per year.