EXECUTIVE SUMMARY

PREPARED FOR THE PIEDMONT TRIAD SUSTAINABLE COMMUNITIES REGIONAL PLANNING PROJECT

BY

DR. STEPHEN J. SILLS
DR. MARK R. SILLS

SILLS CONSULTING, LLC
BACKGROUND
As a recipient of a Sustainable Communities Regional Planning Grant, the PTRC has been charged with the task of engaging those who may have been marginalized from community planning processes in the past. One element of final regional plan for sustainable development is a Fair Housing and Equity Assessment (FHEA) to enumerate the experiences of protected classes and make recommendations that will address disparate treatment and outcomes in the area. According to HUD guidelines, the Fair Housing and Equity Assessment should examine the impact of state, local, and regional policies, procedures, and practices on the availability of fair and affordable housing for all people in the region. It should also analyze the impact of private-sector policies and rules in order to identify actions, decisions, policies or omissions that have the effect of restricting housing choice based on one’s membership in a protected class as defined by the federal Fair Housing Act.

Title VIII of the Civil Rights Act of 1968 and its sub-sequent amendments were designed to protect renters and home buyers from unequal treatment, yet testing has revealed continuing patterns of housing discrimination against protected groups. When these groups find their residential mobility blocked, it creates a barrier to spatial assimilation – a key component to socioeconomic and occupational mobility. The Fair Housing Act declares, “It is the policy of the United States to provide, within Constitutional limitations, for fair housing throughout the United States.” In addition the law directs all executive departments and to administer their programs and activities related to housing and urban development in a manner that affirmatively furthers the purposes of the Act.

DATA SOURCES
Primary and secondary data sources were used in this report. The analytical design included information from micro, meso, and macro levels of analysis. Inherently mixed-method in design, the analysis attempts to triangulate the experiences of residents (with a special focus on those most vulnerable for discrimination), the perceptions of housing experts, and the empirical quantitative and geospatial data from state, federal, and commercial sources. These sources include:

- Freedom of Information Act (FOIA) request for Fair housing complaints/violations in region
- Findings from local paired testing studies
- Federal Financial Institutions Examination Council’s (FFIEC) Home Mortgage Disclosure Act (HMDA) Loan Application Report (LAR) data analysis
- Key Informant Interviews with realtors, landlords, community planning, and fair housing experts
- Focus Groups in a selection of the R/ECAPs and areas of high opportunity/low diversity
- Online Survey of residents regarding ethnic relations and fair housing
- Geographic Information Systems Mapping using ArcGIS online with layers from commercial and governmental sources.
North Carolina is the tenth most populous state in the United States. Over the course of the last decade, the population growth has been twice that of the nation. As of 2010, the twelve county region of the Piedmont Triad had a population that exceeded 1.6 million residents. At the heart of the Piedmont Triad is one of the most sprawling metropolitan areas in the country. The Greensboro-Winston-Salem-High Point MSA has experienced rapid and extensive growth, with urban and suburban development over an area of nearly 1000 square miles.

During the past twenty years, the Piedmont Triad Region of NC has become more ethnically and culturally diverse as immigrants and refugees from all parts of the world have moved into the region. Between 2000 and 2010, the non-white population increased from a quarter (24.9%) of the population to just under a third (29.1%) of residents. In the last decade alone, Winston-Salem and Greensboro became majority-minority.

As a whole, 6.8% of residents living within the twelve counties of the Piedmont Triad are either immigrants or refugees from foreign countries. In particular, Mexican immigration flows have shifted from their traditional destinations (Florida, Texas, and the West Coast states) to the mid-South. North Carolina led the nation in Hispanic population growth from 1995 to 1999, with Mexican migrants often beginning as agricultural workers and then moving into other low-wage sectors such as poultry processing, construction, and service work. Between 2000 and 2010, the Hispanic population has doubled from 72,867 to 142,829 or about 8.7% of the population.

Diversity in the U.S. population is increasing. The Diversity Index shows the likelihood that two persons chosen at random from the same area belong to different race or ethnic groups. The diversity score for the entire United States in 2012 is 61. While the overall diversity of the region has increased, residential distribution of populations vary greatly. Urban areas in the Piedmont Triad vary greatly in ethnic diversity with some pockets of high diversity (scores above 82) and others of almost no diversity. Rural areas of the western Piedmont Triad are particularly lacking in diversity (scores between 4 and 29).
Table 2 - Hispanic Population Piedmont Triad, Census 2000 and 2010

<table>
<thead>
<tr>
<th></th>
<th>2010 Census</th>
<th>2000 Census</th>
<th>2000-2010 Change</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Counts</td>
<td>Percentages</td>
<td>Counts</td>
</tr>
<tr>
<td>Alamance County</td>
<td>16,639</td>
<td>11.01%</td>
<td>8,835</td>
</tr>
<tr>
<td>Caswell County</td>
<td>744</td>
<td>3.14%</td>
<td>415</td>
</tr>
<tr>
<td>Davidson County</td>
<td>10,408</td>
<td>6.39%</td>
<td>4,765</td>
</tr>
<tr>
<td>Davie County</td>
<td>2,496</td>
<td>6.05%</td>
<td>1,209</td>
</tr>
<tr>
<td>Forsyth County</td>
<td>41,775</td>
<td>11.91%</td>
<td>19,577</td>
</tr>
<tr>
<td>Guilford County</td>
<td>34,826</td>
<td>7.13%</td>
<td>15,985</td>
</tr>
<tr>
<td>Montgomery County</td>
<td>3,926</td>
<td>14.12%</td>
<td>2,797</td>
</tr>
<tr>
<td>Randolph County</td>
<td>14,698</td>
<td>10.37%</td>
<td>8,646</td>
</tr>
<tr>
<td>Rockingham County</td>
<td>5,159</td>
<td>5.51%</td>
<td>2,825</td>
</tr>
<tr>
<td>Stokes County</td>
<td>1,254</td>
<td>2.65%</td>
<td>836</td>
</tr>
<tr>
<td>Surry County</td>
<td>7,155</td>
<td>9.71%</td>
<td>4,620</td>
</tr>
<tr>
<td>Yadkin County</td>
<td>3,749</td>
<td>9.76%</td>
<td>2,357</td>
</tr>
<tr>
<td>Total</td>
<td>142,829</td>
<td>8.71%</td>
<td>72,867</td>
</tr>
</tbody>
</table>

Historically, the economy of Piedmont Triad of NC relied heavily on furniture manufacturing, textiles, and agriculture. With globalization and competition from Latin America and East Asia, much of the textile and furniture production moved to countries with lower labor costs. Agriculture also experiences a decline as demand for tobacco has declined. Today, major employment sectors include: manufacturing (14.9%), retail trade (11.3%), health care and social assistance (13.3%), accommodation and food services (8.5%), educational services (7.6%), and administrative and waste services (7.3%).

Poverty in the Piedmont Triad has increased from 12.3% of individuals in 2000 to approximately 16.4% of the population. Household median incomes ranged from a low in Surry County of $36,788 to a high of $50,562 in Davie County. Poverty is highest in rural where unemployment was high (Caswell, Montgomery, Surry, and Randolph Counties) as well as in a few census tracts of the urban core of the Piedmont Triad. Nationally, this trends has been well established in the literature - the poor, and especially poor minorities, have been increasingly concentrated in segregated areas. A recent study by Lichter, Parisi, and Taquino (2012) entitled “The Geography of Exclusion: Race, Segregation, and Concentrated Poverty” found:

...that the poor are likely to be living in poor areas and are highly and increasingly segregated from the non-poor population. The post-2000 period was not only marked by rising poverty rates but also by a new pattern of spatial (and social) isolation America’s poor. The 2000s represent a clear change from the past. America’s poor and affluent Populations are increasingly being sorted unevenly across poor (and economically declining) and non-poor communities. Geographic isolation is a central component to the notion of “concentration effects” on employment outcomes, maladaptive behaviors (e.g., drug use) ,and cultural patterns that reflect and reinforce poverty.

Jaret et al. (2006) have found that areas with high rates of suburban growth, such as we find in the Piedmont Triad, are “linked to increased residential segregation between blacks and whites, along with the related claim that such suburbanization contributes to more severe job-residence spatial
Table 3 - Per Capita and Household Incomes, 2007-2011

<table>
<thead>
<tr>
<th></th>
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<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>North Carolina</td>
<td>$25,256</td>
<td>$46,291</td>
<td>12.3%</td>
<td>16.1%</td>
</tr>
<tr>
<td>Alamance County</td>
<td>$23,477</td>
<td>$44,430</td>
<td>11.1%</td>
<td>16.1%</td>
</tr>
<tr>
<td>Caswell County</td>
<td>$17,643</td>
<td>$37,926</td>
<td>14.4%</td>
<td>20.5%</td>
</tr>
<tr>
<td>Davidson County</td>
<td>$22,624</td>
<td>$44,728</td>
<td>10.1%</td>
<td>15.1%</td>
</tr>
<tr>
<td>Davie County</td>
<td>$26,412</td>
<td>$50,562</td>
<td>8.6%</td>
<td>12.3%</td>
</tr>
<tr>
<td>Forsyth County</td>
<td>$26,424</td>
<td>$46,417</td>
<td>11.0%</td>
<td>16.3%</td>
</tr>
<tr>
<td>Guilford County</td>
<td>$26,644</td>
<td>$46,288</td>
<td>10.6%</td>
<td>16.2%</td>
</tr>
<tr>
<td>Montgomery County</td>
<td>$18,816</td>
<td>$32,946</td>
<td>15.4%</td>
<td>25.9%</td>
</tr>
<tr>
<td>Randolph County</td>
<td>$21,384</td>
<td>$40,602</td>
<td>9.1%</td>
<td>17.6%</td>
</tr>
<tr>
<td>Rockingham County</td>
<td>$20,861</td>
<td>$38,311</td>
<td>12.8%</td>
<td>15.8%</td>
</tr>
<tr>
<td>Stokes County</td>
<td>$21,021</td>
<td>$43,099</td>
<td>9.1%</td>
<td>14.3%</td>
</tr>
<tr>
<td>Surry County</td>
<td>$20,391</td>
<td>$36,788</td>
<td>12.4%</td>
<td>18.0%</td>
</tr>
<tr>
<td>Yadkin County</td>
<td>$21,523</td>
<td>$40,375</td>
<td>10.0%</td>
<td>12.3%</td>
</tr>
</tbody>
</table>

mismatches for blacks.” Historically, all of the jurisdictions included in this study have, in effect, sustained patterns of segregation and created concentrated areas of poverty by zoning policies that tended to limit the development of public and affordable housing to certain areas. More recently, steps have been taken to undo some of the harm caused by such policies by means of Housing Choice Voucher programs and redevelopment initiatives.

Affordable Housing Stock

A factor that often limits fair housing choice is the combination of availability and affordability of housing. According to the 2010 United States Census, the Piedmont Triad Region contained a total of 724,393 units of housing. The overall occupancy rate was 86.24% indicating a relatively soft rental market. Of the total housing units, 60.81% were occupied by the owner. About a tenth (10.5%) of all units are vacant. Rates of owner-occupied housing are highest in the urban counties (Guilford County, Alamance County, and Forsyth County), but lowest in the urban core of those areas. Rural counties in general have high rates of owner-occupancy (64%-75%) with the exception of Montgomery County and much of Caswell County where poverty is high. Forty-four percent of the housing in this region was built prior to 1978.

According to the American Community Survey 2008-2010, the median monthly housing cost for renters in this region was $607.33. The median home value in the Piedmont Triad Region in 2012 was an estimated $125,129. Median home values are highest (over $348,000) in the suburban areas Northwest of Greensboro, just north of downtown Greensboro, and in urban Winston-Salem west of downtown. The lowest home values ($53,000 or less) are found in those areas with the highest concentrations of minorities and poverty as well as in rural areas. Overall, nearly 50% of all renters in the region were “cost burdened”, meaning that they spent more than 30% of household income on housing related costs. This is well above the 33% national rate of cost burdened households. Caswell and Montgomery Counties had the highest percentage of cost burdened households with the percentage just below or above 60% of the total. All counties were above the national average.
In all of the jurisdictions included in this study, a shortage of affordable housing was noted as an impediment. A shortage of affordable housing choices not only limits individual families. The impact on family spending has significant economic repercussions throughout the immediate community and beyond. The 2011 State of the Nation's Housing report showed that a shortage of affordable housing forces lower-income families to shift the cost of housing to transportation living further from the places where schools, shopping, and employment are located.
Awareness of Fair Housing Law

An online survey was conducted in 2013 to solicit feedback from residents in the Piedmont Triad. The survey posited two questions testing respondents’ understanding of what is legal under fair housing law and who is protected by the law. The survey also presented several questions and scenarios testing respondents’ opinions about fair housing issues and attitudes toward segregation.

- **Awareness of Protected Classes:** Race, color, religion, national origin, sex, familial status, and disability are all statuses currently protected under the federal law. A majority of respondents correctly identified disability, race, and ethnicity as protected classes. Only half (50.6%), identified religion as a protected class. Importantly, sex, familial status, and national origin were not identified by most as protected classes. Age, employment status, sexuality, marital status, and having pets are not protected classes under federal laws, though some local ordinances may provide protections. More than two-thirds of respondents (67.6%) misidentified age as a protected category. A little over a quarter of respondents (26.2%) believe that sexual orientation statuses are protected. Others were under the impression that same-sex couples (22.1%) and unmarried couples (17.6%) are protected. A few respondents (7.9%) believe that people who are unemployed are protected. An almost equal number (7.4%) identified people with pets as a protected category.

- **Thoughts on Steering:** Participants were asked whether it is legal for real estate agents to steer home searches to all-white or all-black areas. A majority of respondents correctly indicated that steering is not legal. However, 99 of 503 respondents (19.7%) believed it to be currently legal to do so.

- **Limiting home searches to racial/ethnic neighborhoods:** Respondents were asked if a real estate agent should be able to decide to focus home search on all-black or all-white areas. Most people responded correctly to this question. Only 5.1% of respondents indicated that a real estate agent should be able to steer clients to particular neighborhoods based on race.

- **Restricting sales or rental to minorities:** Survey respondents were asked if they think homeowners and landlords should decide for themselves to whom to sell or rent their home/apartment to, even if they prefer not to sell or rent people of a certain race, religion, or nationality. More than a third of respondents (34.4%) felt that homeowners and landlords should have the right to decide to whom they sell or rent. Non-Hispanic whites were more likely to favor restrictions as were those in who live in rural areas.
EXPERIENCES OF SEGREGATION AND DISCRIMINATION

Survey respondents were also asked about housing choice, diversity, as well as their as experiences of everyday discrimination and housing discrimination.

- **Reasons for selecting their home:** Respondents were allowed to select the three most important factors which influenced their selection of a home. More than half of the respondents indicated affordability (54.0%) and convenience (52.0%) and over a third (35.3%) indicated safety.

- **Racial exclusivity as factors in home selection:** Only nine people (1.8%) indicated that having people of the same race was important to their selection of housing. Seven of the nine live in rural areas.

- **Desire to live in racial enclave.** Respondents we asked if they would prefer to live in a community made up mainly of people who are the same race as them or a mix of races. One in six respondents (16.2%) indicate they would like to live racial enclaves. Further exploration was conducted into these cases. We found statistically significant link between older, white, and rural residents and desire to live in racially segregated areas.

- **Diversity as selection criterion:** only 46 respondents (9.0% of cases) indicated that diversity was a factor in selecting a home. Diversity was more important to African Americans than other race/ethnic groups. Diversity was also more important to immigrants. Likewise, it was more important to urban residents than rural.

- **Neighborhood racism.** Eighty-one respondents of 492 (16.5%) said that they had lived in a neighborhood where neighbors made life difficult for them or their family. This was more common among non-white (22.9%) than white respondents (15.8%)

- **Discrimination in home seeking.** One in five respondents reported that they had experienced housing discrimination when in the process of buying or renting a home. Of those, 45.9% said it had occurred on more than one occasion. Nearly three-quarters of respondents (73.3%) said the discrimination had occurred in the rental process as opposed to home buying (26.7%). Nearly a third said it was the landlord of a rental property (29.9%) who discriminated against them. Nearly a quarter (23.4%) said it was the homeowner in the sale of a property. Real estate agents were the third most common to have discriminated (17.8% of respondents).

- **Responses to discrimination.** Only 21.9% respondents indicated that they took any action against discrimination. Most respondents complained to the person discriminating against them and/or complained to someone else (28.6% each). Only three (7.1%) complaints were filed with a government agency and only five (11.9%) sought help with a fair housing organization. Most who did not respond to the discrimination said it was not worth it (26.8%) or didn't think it would help (26.8%). Importantly some people (11.0%) were not sure about where or how they should complain.
FAIR HOUSING COMPLAINTS TO HUD 2009-2011

Analysis of two years of data from HUD helped us to understand some of the most significant fair housing issues in the region. The majority of cases originated in counties with Fair Housing Assistance (FHAP) Agencies – in the urban areas of Alamance (7.6% of cases), Guilford County (42.7% of cases), and Forsyth County (41.2%).

1. **Reasons for complaints:** Cases originated as complaints of discrimination against individuals on the basis of race (37.4% of cases), national origin (37.4% of cases), sex (16.8% of cases), disability (22.9% of cases), or family status (14.5% of cases). Many cases involved multiple forms of discrimination simultaneously.

2. **Few rural complaints:** 94.7% of cases were processed by FHAPs rather than by HUD directly (7 cases of 131). This is not to imply that counties without FHAPs do not have violations of Fair Housing laws, but that communities may be less aware or unsure of how to pursue a case.

3. **Complaint resolution:** One fifth (21.4%) of cases reached settlement or conciliation, while more than two-fifths (43.5%) of cases resulted in a “no cause” determination. The remaining 20% of cases were closed or withdrawn for a variety of reasons. Only 19 cases ended up with the complainant receiving compensation (ranging from $200 to $7670).

**Table 4 - Basis of Complaint**

<table>
<thead>
<tr>
<th>Basis</th>
<th>N</th>
<th>Percent</th>
<th>Percent of Cases</th>
</tr>
</thead>
<tbody>
<tr>
<td>Race</td>
<td>49</td>
<td>28.3%</td>
<td>37.4%</td>
</tr>
<tr>
<td>National Origin</td>
<td>49</td>
<td>28.3%</td>
<td>37.4%</td>
</tr>
<tr>
<td>Sex</td>
<td>22</td>
<td>12.7%</td>
<td>16.8%</td>
</tr>
<tr>
<td>Disability</td>
<td>30</td>
<td>17.3%</td>
<td>22.9%</td>
</tr>
<tr>
<td>Family Status</td>
<td>19</td>
<td>11.0%</td>
<td>14.5%</td>
</tr>
<tr>
<td>Religion</td>
<td>2</td>
<td>1.2%</td>
<td>1.5%</td>
</tr>
<tr>
<td>Retaliation</td>
<td>2</td>
<td>1.2%</td>
<td>1.5%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>173</td>
<td>100.0%</td>
<td></td>
</tr>
</tbody>
</table>

**Table 5 - Closure Reason on HUD Fair Housing Complaints, Piedmont Triad NC**

<table>
<thead>
<tr>
<th>Closure Reason</th>
<th>Frequency</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>OPEN CASE</td>
<td>27</td>
<td>20.6%</td>
</tr>
<tr>
<td>Complainant Failed to Cooperate</td>
<td>6</td>
<td>4.6%</td>
</tr>
<tr>
<td>Conciliated/Settled</td>
<td>28</td>
<td>21.4%</td>
</tr>
<tr>
<td>Lack of Jurisdiction</td>
<td>2</td>
<td>1.5%</td>
</tr>
<tr>
<td>No Cause</td>
<td>57</td>
<td>43.5%</td>
</tr>
<tr>
<td>Unable to Locate Complainant</td>
<td>1</td>
<td>.8%</td>
</tr>
<tr>
<td>Withdrawal Without Resolution</td>
<td>4</td>
<td>3.1%</td>
</tr>
<tr>
<td>Withdrawn After Resolution</td>
<td>6</td>
<td>4.6%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>131</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

FEEDBACK FROM REGIONAL HOUSING PROFESSIONALS
County planners, economic development professionals, fair housing advocates, property managers, and fair housing advocates were interviewed for this report. Notably missing were economic development professionals who declined to be interviewed. According to these key informants:

1. **Lack of consistency in policies by jurisdiction:** Key informants indicated that fair housing policies, activities and enforcement differ significantly between urban and rural areas. Outside of the cities, there is little or no fair housing activity. While urban areas have educational outreach services and some level of investigation or enforcement, rural areas reported that enforcement of fair housing law is viewed as an anti-business activity and therefore such efforts are directly or indirectly discouraged.

2. **Poor housing market conditions** were a significant factor in influencing housing choice both urban and rural areas. The overall condition of the economy is a driving factor in all areas, but financing for the purchase of manufactured housing is especially difficult in rural areas.

3. **Steering:** Steering occurs when housing professionals (agents, landlords, property managers, etc.) try to limit housing choice by encouraging home seekers to view certain apartments, homes, or neighborhoods on the basis of their race, national origin, or another reason. Housing professionals in the area admitted that this is a factor in limiting choice.

4. **Infrastructure issues** (principally water and sewer) were seen as limiting for the development of affordable or multi-family housing in rural areas.

5. **Housing code enforcement** was seen as a potential way to overcome disparities in areas with Racial or Ethnic Concentrations of Poverty (R/ECAPS). Seizing abandoned housing, as well as properties on which back taxes are owed, and turning them over to charitable groups was suggested as a way to reclaim housing stock in blighted neighborhoods and provide more affordable choices.

6. **Transportation:** Several planning directors pointed out that housing tends to cost less in rural counties, but the best paying jobs are concentrated in urban counties. They suggested that more inter-county transportation options would significantly increase housing choice for protected classes by making it more affordable for people to live in rural counties and work in urban counties. Housing advocates also tended to see an expansion of transportation options as life enhancing for lower-income households by increasing access to educational, employment, and shopping opportunities.

7. **Regionalization** in fair housing and planning were received positively by most. A regional approach to fair housing enforcement and planning "makes good sense from both the programmatic and the economic standpoint."
EVIDENCE OF RENTAL DISCRIMINATION

Paired-testing studies of rental units in Greensboro have revealed continuing patterns of discrimination against minorities and immigrants and steering of whites away from the more diverse, but lower income neighborhoods. The social structure and market conditions in Greensboro are similar to those in other urban areas of the Piedmont Triad. Greensboro may therefore be seen as a good proxy for rental market activities in these other urban areas.

The 2012 Greensboro Audit Study documented the disparate treatment of potential renters on the basis of sex, race, or national origin. The study was conducted in two phases. First a series of over 1100 phone calls to all rental properties using accented callers and then 50 in-person paired tests. The analysis of pre-visit call and in-person visit data demonstrated disparate treatment of potential renters in regards to their access, quoted costs, and encouragement to rent properties by ascribed statuses of race/ethnicity and sex.

In both phases of the project minority testers were less likely to have calls returned, less likely to be told that a property was available when it was available to other testers, and were less likely to meet with a leasing agent. Some properties seemed to routinely turn away or not respond to voicemail from minority testers. Other properties were simply so inconsistent in their business practices that some callers were unable to obtain access. Yet, the aggregate data shows that after two rounds of telephone tests minority testers were less likely to complete a call and arrange for a visit to advertised rental properties.

In terms of information and costs, we also found a clear pattern in which minority testers were more likely to receive inconsistent rent amounts than white testers. Notably, in the first phase of the project 32.1% of tests conducted by African Americans resulted in higher rents quoted than were quoted to the testing coordinator during the control call. Face-to-face test supported this finding with African Americans quoted rents higher than control in 27.3% of cases.

On the measure of encouragement, we found that in phase one of the project, Asians and Latinos were the least encouraged to visit a property. Face-to-face paired tests in phase two showed African American testers to be the group most likely to be invited to apply on the spot while white testers were the most likely to be invited to take an application home and return it later.
DISPARATE ACCESS TO CREDIT

The seemingly transparent process of applying for a loan should produce equitable outcomes in the distribution of loan approvals, yet, discrimination may occur at different stages in the process of buying a home. Nearly two-thirds of all applications for a mortgage in the Piedmont Triad were approved (64.2% in 2011, down slightly from 66.8% in 2010). However, our analysis of HMDA data indicated the following disparate outcomes in approval rates.

- **Approval by loan type:** The approval rate varied by the type of the loan and the purpose of the loan. FHA loans, which had been in the 80% approval range in the mid-2000s, were down to 61.8% in 2011, due to greater scrutiny and stricter requirements for applications. VA loans (also historically in the 85% approval rate just five years ago), we found to be only slightly higher than conventional loans at 64.2%. Farm Service Agency (FSA) or Rural Housing Service (RHS) loans were the highest in 2011 at 80.5% approvals.

- **Approval by county:** Origination of loans varied significantly between counties. Forsyth had the highest approval rating with 67.0% of loan applications being approved. Rural counties fared less well than urban counties. Caswell County for example had only 51.8% of loan applications approved. Thus, access to credit is more limited in rural areas.

- **Approval by sex:** In 2011, 63.7% of male applicants and 58.6% female applicants were approved for a loan.

- **Approval by race:** White applicants were more likely to be approved than non-white applicants:
  - Two-thirds (65.4%) of applications made by Non-Hispanic White primary applicants were approved; only 50.1% of applications from Non-White primary applicants were approved.
  - Comparisons were made between each of the race/ethnic groups. Pacific Islanders had the highest approval rates (69.9%), followed by Non-Hispanic White applicants (65.4%), Asians (58.3%), Hispanics (51.4%), African Americans (48.4%), multiracial applicants (48.0%), and American Indians (41.2%).

- **Reasons for denial:** “Credit History” was the primary reason for both groups, yet we see nearly a 10% gap between them; 34.4% of non-whites’ applications were denied due to credit as compared with only 25.7% of whites. Other denial reasons such as “Debt-to-Income Ratio” only showed slight differences between groups (20.1% non-whites, 18.7% whites). “Collateral” was seen to be somewhat more an issue for whites (18.3% non-whites, 22.7% whites).
Racially Concentrated Areas of Poverty (RCAP)

According to HUD, a “RCAP/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 of individuals living at or below the poverty line. Because overall poverty levels are much lower in many parts of the country, we supplement this with an alternate criterion. Thus, a neighborhood can be an RCAP/ECAP if it has a poverty rate that exceeds 40% or is three times the average tract poverty rate for the metro/micro area, whichever threshold is lower. Census tracts with this extreme poverty that satisfy the racial/ethnic concentration threshold are deemed RCAPs/ECAPs.”

In order to investigate these areas, HUD’s Office of Policy Development & Research (PD&R) created a set of statistical and geospatial “Data Tools” and supplied them to the Sustainable Communities Regional Planning Grantees. This report uses data from the November 2012 update to the Data Tools. The update included corrections to geography in ArcGIS maps as well as some of the statistics used in computing RCAPs. Detailed geospatial analysis of demographic, labor and economic, housing, neighborhood and community conditions are provided in the full report for each RCAP identified. All of the RCAPs identified are in urban areas of Greensboro, Winston-Salem, High Point, Thomasville, and Lexington. No ECAPs were found using this data. While ethnic concentrations exist, none are geographically large enough or concentrated enough to fit the HUD definition of an ECAP.

Figure 1 - RCAPs in the Piedmont Triad of NC
DAVIDSON COUNTY RCAPs

Davidson County is 82.0% white, 8.9% African American and 6.4% Latino. The Dissimilarity Index for the Thomasville-Lexington MSA is 0.547. Racial imbalance in Davidson County has been documented in several other studies. For example, in the 2013 report “Racial and Economic Diversity in North Carolina’s Schools: An Update” the authors find that Davidson County has the second highest level of segregation in schools in the state. Part of this has to do with the concentration of minorities in historically black neighborhoods in Lexington and Thomasville. Two communities in particular were identified in Davidson County as fitting HUD’s definition of RCAPs: East Lexington and Northwest Thomasville.

LEXINGTON

Census Tract 614 in Lexington was identified as an RCAP. The area has a total population of 3,398 with 2,163 non-whites (63.7%). The poverty rate is 53%. The estimated unemployment rate here was 38.2% in summer 2010, affecting an estimated 454 people age 16 and over. This area is characterized by:

- Low owner occupancy (under 40%)
- About 15% of units are vacant and 47% are rental.
- The area has between 0.3% and 5.9% of units using housing Choice Vouchers.
- The HUD Job Access Index ranges from a low of 47 to a high of 94. However, Labor Market Engagement is at the lowest level on the scale (score of 1 out of 100).
- Median Net Worth is below $15,000.
- The School Proficiency Index (score 42.50) is mediocre, especially compared with adjacent tracts that have access to county schools. Lexington Senior High School captures students from these blocks. Nearly three-quarters (71.2%) of the students in this school are on free or reduced lunch.
- The Personal Crime Index for in this RCAP was high.

THOMASVILLE

Census Tract 608 in Thomasville was identified as an RCAP. The area has a total population of 4,538 with 2,625 non-white (57.8%). The poverty rate is 48%. The estimated unemployment rate here was 28.5%. This area is characterized by:

- Low owner occupancy (under 40%)
- Two-thirds of the units were rental, 9% owned free and clear, and 13% mortgaged.
- The HUD Job Access Index ranges from 41 to 84. However, Labor Market Engagement is at the lowest level on the scale (score of 6 out of 100).
- Median Net Worth is below $15,000
- Block 608.001 and 608.002 are rated in the lowest level of the School Proficiency Index (score 8.50) while block 608.003 is near the top of the scale (score 72.50). Thomasville High School captures students from blocks .001 and .002. Three quarters of the students in this school are on free or reduced lunch.
- The Personal Crime Index was relatively low.
FORSYTH COUNTY RCAPs

Forsyth County is 58.7% white, 25.5% African American and 11.9% According to the *City of Winston Salem and Forsyth County Analysis of Impediments of Fair Housing Choice:*

...approximately 87% of the Black population lives in the city. In fact, over 86% of all minorities reside within the city limits of Winston-Salem.3 Winston-Salem is racially segregated along the Hwy 52 corridor. These demographic trends have their basis in Southern history. Prior to the civil rights movement of the 1960s, segregation in the South was the rule. Current segregated housing patterns are attributable to the historical legacy of overt discrimination in housing through both public policy and social practices. Residential segregation became an important component of the institutionalized effort to isolate the races.

This community just east of Hwy 52 fits HUD's definition of an RCAP. Eight contiguous Census Tracts in Winston-Salem were identified (301, 500, 600, 700, 801, 802, 1602, 1901). The total population in this area is 16,034 of whom 14,993 (93.5%) are non-white. The estimated unemployment rate in the summer of 2010 ranged from a low or 10.6% to a high of 36.3%, affecting an estimated total of 1523 people age 16 and over. Recently, this area was also subject to severe devaluation of property tax values prompting fear that speculators would move in to buy up low value homes and gentrify the area. The southern portion of the RECAP has been identified for redevelopment in the City-County Planning Board 2013. “Southeast Winston-Salem Area Plan Update.” According to the Planning Board: *The Southeast area of Winston-Salem is an area that has experienced change in recent years due to the increased number of immigrants, mostly of Hispanic origin, settling in and opening new businesses, enhancing further diversity in the population of the area. This area is further characterized by:*

- Low owner occupancy (under 40%)
- Housing Choice vouchers per census tract in the RCAP range from a low of 8.22% of total housing units to a high of 55.47% of housing units.
- There is a concentration of low-income tax credit assisted units in the RCAP.
- The HUD Job Access Index ranges from a very low of 8, to a very high of 95. However, Labor Market Engagement is at the lowest level on the scale (score of 1 to 6 out of 100).
- Median Net Worth is below $15,000 in all of this R/ECAP.
- The School Proficiency Index for blocks within this RCAP show very poor result with scores as low as 2 and as high as 7. This is especially notable as adjacent blocks have scores of 95 and higher.
- The Personal Crime Index for the block groups in this RCAP ranged from a low of 80 to a high of 449
**Guilford County RCAPs**

Guilford County is 57.0% white, 32.5% African American and 7.1% Latino. The Dissimilarity Index for the Greensboro-High Point MSA is 0.498. According to Reardon and Biscoff (2011), income segregation increased in Greensboro-High Point MSA by .021 points; this was one of the biggest rises in income segregation in the US during the decade. This may be the result of policy and zoning. For example, the 2011 City of High Point Analysis of Impediments to Fair Housing Choice notes: *Zoning districts that permit multi-family housing units as a use by right are concentrated primarily in the central and southern neighborhoods of the City, which are also predominantly racially- and ethnically-impacted areas as well as LMI [low-and moderate-income] areas.* Likewise the report notes: *Despite the deconcentration efforts of the High Point Housing Authority, public housing and Section 8 units are concentrated primarily in the central and southern areas of the City, which are also areas of concentration of Blacks and Hispanics.* Thus, policy and planning choices have contributed to the concentration of low income minorities in the areas we have identified as fitting HUDs definition of RCAPs. There are four areas we will analyze as RCAPs in Guilford County, two in Greensboro and two in High Point: East Greensboro; South Central Greensboro; East High Point; and South High Point.

**Greensboro**

In east Greensboro, there are two Census tracts (11000 and 11200) designated as RCAPs. The total population in this area is 10,159 of whom 94.8% are non-white. The northern end of the RCAP encompasses the areas known as Eastside Park, East Market Street, and the Historically Black Colleges and Universities (HBCUs) of Bennett College and North Carolina Agricultural and Technical University. In this area the City of Greensboro has recently purchased and demolished dilapidated houses, conveyed properties to nonprofit housing developers, and rehabilitated apartments. The City adopted the East Market Street Redevelopment Plan in June 1998 and earmarked $1 million for improvements in the neighborhood. Since then, the East Market Street Corridor has seen more than $150 million in new private and public investment. The middle section of this RCAP has been known as Morningside, but is currently undergoing revitalization and will be known as Willow Oaks. The southern portion of this RCAP encompasses the communities of Southside and Ole Asheboro. According to the Urban Design Associates 2004 “Ole Asheboro Redevelopment Plan” the area has had serious issues with prostitution, lack of code enforcement, vacant and boarded-up properties, drug houses, absentee landlords, poorly maintained parks, abandoned houses, abandoned vehicles, vacant lots, city land banking, lack of neighborhood businesses. This area is further characterized by:

- Low owner occupancy (under 40%) ranging from a low of 0% owner occupancy to a high of 43%.
- The estimated unemployment rate in the summer of 2010 for the RCAP in east and southeast Greensboro ranges between 23.9% to 38.4%.
- The HUD Job Access Index ranges from a very low of 4 to a very high of 99. However, Labor Market Engagement is at the lowest level on the scale (score of 5 out of 100).
- The Median Net Worth is below $15,000.
- The Personal Crime Index for the block groups in this RCAP ranged from a low of 57 (around NC A&T) to a high of 293.
In south central Greensboro, there are two Census tracts (11400 and 11500) designated as RCAPs. The RCAP includes the communities of the Glenwood, Warnesville, Oak Grove, Southmont, and Smith Homes. Glenwood is one of Greensboro’s earliest planned neighborhoods. The total population in this area is 8,255 of whom 84.4% are non-white. The estimated unemployment rate in the summer of 2010 ranged from a low or 22.6 to a high of 43.3%, affecting an estimated total of 1254 people age 16 and over. Currently a $200 million, mixed-use campus village for UNCG is under construction in the north of the RCAP. The development will include hundreds of student housing units, retail shops, a recreation center, and a university police station.

- Owner occupancy in south central Greensboro ranges from a low of 12% to a high 39%.
- The HUD Job Access Index ranges from a very low of 1 to a high of 88. The Labor Market Engagement in this area varies from the lowest level on the scale (score of 1 out of 100) to a low of 38.
- The Median Net Worth is also below $15,000.
- The School Proficiency Index for Tracts within this RCAP have scores as low as 2.5 and as high as 66.5.

**HIGH POINT**

In east High Point, there are a total of nine Census block groups designated as RCAPs. This area includes the neighborhoods of Washington Drive, Washington Terrace, and East Central High Point. The total population in this area is 9,194 of whom 90.5% are non-white. The poverty rate is between 49% and 59%. According to the High Point Core City Plan Master Plan, the areas of East Central and Washington Drive, “...share strong cultural and historical ties to High Point’s African-American community. Unfortunately, these neighborhoods have been impacted by the exodus of middle-class households, and the proliferation of drugs and other social ills. A concentration of poverty and poor housing conditions have combined with these factors to impact on the marketability of the neighborhoods.” Washington Drive in particular is described as once being “an economic and cultural hub for High Point’s African American community.” Today though it is characterized by vacant buildings and lots, deteriorated buildings, physically and economically deteriorated surrounding neighborhood.” This area is further characterized by:

- Low owner occupancy (under 40%)
- Three of five tax credit assisted properties in High Point are located in this area
- Labor Market Engagement is very low (score of 3 out of 100).
- The Median Net Worth is below $15,000.
- The School Proficiency Index is as low as 2.5 and as high as 5.5 on a scale of 100.
- The Personal Crime Index for the block groups in this RCAP ranged from a low of 60 to a high of 269. All but one of the blocks was above the national average of 100.

In south High Point, there are a total of eight Census block groups designated as RCAPs. The total population in this area is 7,424 of whom 64.0% are non-white. The High Point Core City Plan Master Plan describes Southside as having “been targeted for scattered site public housing units, while the southern portions have vacant land and poor housing conditions.” This policy of the latter half of the 20th century contributed to the concentration of Race/Ethnic poverty. Just south of this area are the small, yet diverse ‘islands’ neighborhoods of Oak Hill and Highland Mill Village. These
communities are located in isolated pockets between industrial areas. According to the Master Plan they appear “to have been developed as housing for workers at the nearby mills. Although the housing dates from the 1940s and 1950s ...” The final two neighborhoods in this RCAP are West English Neighborhood and the Kendall Avenue Neighborhood. These neighborhoods are less economically and social stable than similar neighborhoods in other parts of the City. Housing stock is mixed with small, single-family homes from mid-20th century as well as “poorly designed apartment buildings from roughly the 1970s or 1980s, they feature parking lots in the front, and they are poorly maintained.” This area is further characterized by:

- A high poverty rate between 42% and 59% depending on the block group.
- An estimated unemployment rate ranging from a low of 17.8% to a high of 41.2%
- The median net worth of households ranged from a low of $8,571, or 13% of the national average to a high of $11,825, or 18% of the national average.
- School Proficiency scores are as low as 2.0 and as high as 5.5.
Areas of Opportunity

One of the goals of Fair Housing initiatives is to foster diverse communities with good opportunities for residents. By identifying areas of high educational and occupational opportunity and then assisting lower-income residents to live in these areas, HUD hopes to achieve the deconcentration of poverty that plagues some communities we have seen in the previous section on RCAPs. HUD has attempted to achieve this deconcentration by means of the Housing Choice Voucher Program that affords low income residents the means by which they might move to areas of better opportunity.

In this analysis, the choice was made to identify areas where relative performance of a neighborhood’s schools, access to jobs, labor market participation, unemployment, etc. were consistently strong (as computed by a summative score), where at least 15% of the population was non-white, where there were less than 1% HCVs in use, and where at least 10% of available housing stock was rental. Areas of Opportunity (at the resolution of block groups) were identified in the following urban, suburban and rural communities:

West Burlington
- This area of west Burlington is bounded on the north by S. Church St. and to the south by Huffman Mill Rd. Block group 1’s major feature is the Burlington Square Mall and Edgewood Village Shopping Center.
- There are several apartment communities within the tract. The total population here is 896, of whom 31.03% are non-white.
- The unemployment rate is marginal at 7.84%. In 2010 the average travel time to work was 19.50 minutes. Housing owned with a mortgage or loan represents 21.6% of available stock with another 6.1% owning their homes free and clear. More than half of the stock (54.4%) is rental or vacant (17.8%).
- Block group 3 is bounded on the south by I-40/85 and to the east by S. Mebane St. The population here is 1214 individuals of whom 33.69% are non-white.
- There are a few apartment communities in the west and north of the block. The remainder is modest single family homes. Housing owned with a mortgage or loan represents 20.5% of the total number of housing units with another 16.7% owned free and clear. Half is rental (49.2%) and the remaining 13.6 % are vacant.

Northwest Greensboro
- Tract 016006 Block 2 is in northwest Greensboro, just west of Battleground/220 North bounded by Drawbridge Pkwy to the south and Horse Pen Creek Rd on the north and west. The total population in the tract is 1628 individuals, of whom 26.97% are non-white. The unemployment rate is very low at .60%. Only 5.53% are below the poverty line and a poverty index of 83.
- The majority of housing is rental (68.6%) and 9.8% of units are vacant. There were no housing vouchers used in this area.
- Tract 016007 Block group 2 is just to the south of the previous area, bounded on the north east by Battleground Ave and to the south by New Garden Rd. Horse Pen Creek and a watershed form the northern and western boundaries. Brassfield Shopping Center is located at the intersection of New Garden and Battleground. The total population in this
block is 1515, with a quarter (25.87%) non-white. Unemployment is higher at 6.92%. A majority of housing units were rental (59.4%). Housing Choice Vouchers are more in use here representing 2.90% of units.

- Tract 016008 Block 1 was located just north of the Piedmont Triad International Airport. The total population in this suburban area is 2673 with 22.7% non-white. Poverty was low at 4.01% with a Poverty index score of 94. Unemployment was 7.4%. Schools were outstanding with an index of 93.5. Almost a third (30.3%) of housing stock was rental and 8.3% was vacant.

**West Greensboro**

- Two large Census tracts (16203 and 16406) were identified west of Greensboro along the suburban and semi-rural I-40 corridor. Some farming and vacant wooded areas remain, though much of the area has become bedroom communities and rural developments.
- Tract 016203 has a total population of 4013 of whom 26.51% are non-white. The poverty rate is very low (1.74%) and unemployment very low (3.32%). A little over a fifth of housing units (22.4%) are for rent, and 6.8% are vacant.
- To the east is tract 16406 with a population of 3300, 42.09% of whom are non-white. The unemployment is low (1.96%).
- The area is affordable with the median home value of $140,661, or 16% below than the national average. Much of the housing stock is rental (47.3%) or vacant (12.5%).

**North East High Point**

- Tract 16305 Block groups 1 and 2 are bounded on the north by Skeet Club Rd, Oak Hollow Lake to the west and south and Eastchester Dr./68 to the east. The area is mid-way between High Point and Jamestown and is largely a bedroom community.
- Block group 1 has a total population on 1701 with 22.5% who are non-white. This is an affluent area. Poverty is not an issue in the block (0.0% poverty rate). 22.3% of housing units are rental and another 5.3% that are vacant. No Housing Choice Vouchers were used in the area.
- Block group 2 has a total population on 1837 of whom 22.1% are non-white. Schools are outstanding (index of 94.5). One-fifth of housing was rental (20.2%) and another 15.4% of units were vacant. No Housing Choice Vouchers were used in the area.

**North Davidson County**

- The rural tract 60201 lies in northern Davidson County between Thomasville and Lexington. Old Thomasville Rd on the north, Abbots Creek to the east, and Clodfelter Rd to the west. It is sparsely populated with only 1606 individuals, 22.23% of whom are non-white. Schools are very good with an index score of 94.5. The environment is also very good with an index of 90.
- The areas is economically healthy with a poverty rate of 7.34% and unemployment is only 3.51%.
- Only 11.6% of housing units were rental and another 8.5% were vacant. The median home value in this block group in 2012 was $145,536, or 13% below than the national average. No Housing Choice Vouchers were used in the tract.
WEST WINSTON-SALEM
- Bounded on the south by Country club Rd and east by N Peace Haven Rd and to the north by Muddy Creek Tract 3909 Block Group 2 in Winston-Salem has a total population of 1269, of whom 19.23% are non-white.
- Poverty is low, Labor Market participation is high and unemployment is low (4.37%).
- A third of properties (32.2%) are rental and 7.6% are vacant. The median home value in this block group in 2012 was $118,724, or 29% below than the national average. No Housing Choice Vouchers were used in the tract.

LEWISVILLE
- Tract 4010 Block Group 2 in rural Lewisville is bounded on the south by Shallowford Rd and east by Ketner Rd and to the north by Robinhood Rd. It has a population of only 876 and has been included as it has 14.73% who are non-white.
- Poverty is fairly low at 8.61%. Unemployment is low (3.85%).
- A majority of housing was owner occupied. Here housing owned with a mortgage or loan represents 51.5% of the total number of housing units in the block group, and 22.8% owned their homes free and clear. Nonetheless, 19.8% of unites were rental and 6.0% were vacant.

CLEMONS
- Tract 4015 Block Group 1 is located in Clemmons bounded by Stratford Rd on the north, Hampton Rd on the west, Salem Creek on the east and railroad tracks to the south. It is very sparsely populated with on 844 of whom 26.18% are non-white. Schools are excellent with an index score of 93.5.
- Poverty is low in the area with 3.6%. Unemployment is a very low 3.76%.
- More houses are rental in the area (44.3%) than owner occupied. A very large amount of housing stock is vacant (38.7%).
RECOMMENDATIONS

Based on the review of primary and secondary data, we make the following recommendations in regards to increasing awareness of fair housing, addressing discriminatory practices, and increasing efforts to regionalize fair housing enforcement and planning. In addition, planning recommendations are made regarding efforts to address RCAPs as well as how to best utilize areas of opportunity.

INCREASE AWARENESS OF FAIR HOUSING RIGHTS AND LAWS

Lack of awareness of fair housing laws and principals were evident in the survey of residents as well as interviews with key informants. Findings from the review of local Analysis of Impediments to Fair Housing as well as recent paired-testing programs also reveal the need for further training of housing professionals and public officials. The following recommendations are made to increase awareness of Fair Housing law and best practices:

- Conduct local media campaign to educate the public, public officials, and housing providers
- All Housing Counselors, Section 8 managers, landlords, and agents, and staff of Assisted Housing Properties should be required to attend a mandatory Fair Housing training.
- Implement a program of mandatory Fair Housing Training for all agents, managers and staff at rental properties. This program should emphasize consistency of information provided to all clients, timely and effective communications, and equal treatment of all potential renters. This program should initially target those companies that consistently had issues with access, cost, information, and encouragement in paired-testing studies.
- County planners, economic development professionals, fair housing advocates, property managers, and advocates for persons who belong to the protected classes were interviewed for this report. Notably missing were economic development professionals who declined to be interviewed. This group, through Chamber of Commerce and economic development agencies, should be targeted for additional training as they represent investors and the business community.
- Educate city and county staff and elected and appointed officials on fair housing requirements, impediments identified, and actions being taken.
- Outreach activities at all levels should be targeted to immigrants and to persons who are not proficient in English.

ADDRESSING DISCRIMINATION

Clear evidence of disparate treatment or disparate outcomes was demonstrated in both rental and mortgage markets. The following recommendations are made to increase fair housing choice, encourage fair business practices, and enforce fair housing statues:

RENTAL PROPERTIES

- Low Cost Options:
  - Expand the supply of affordable rental housing for very low and low-income households by developing more mixed-income properties in all areas.
o Build “transit-villages” co-locating affordable multi-family housing and public transportation.

- **Recognize Good Companies:**
  o Implement an annual program of recognition of properties with the best business practices (ie. the fewest number of issues in access, cost, information, and encouragement).
  o Recognize publicly those companies with clearest evidence of fair treatment of potential renters.
  o Reinforce support for the business community while also encouraging companies with poor performance to strive for future recognition.

- **Vigorously Pursue Violators:**
  o Companies found to have policies or procedures that result in disparate treatment and/or disparate impact should be pursued to the fullest extent of the law. Our interviews with key informants showed that often Municipalities are hesitant to litigate even when there are clear violations. Regional enforcement would remove some of the contradictory roles of supporting business while protecting civil rights of residents.

**LENDING**

Housing market conditions was a significant factor in influencing housing choice within both urban and rural areas. The analysis of mortgage lending approval rates uncovered disparate impact in lending patterns.

- **Further Institutional Analysis:**
  o Conduct further institutional studies in order to determine which institutions have the most disparate outcomes by sex and race/ethnicity. With some effort, the existing dataset may be joined with descriptive data on each of the lending institutions to investigate the patterns of loan approvals and denials. This research may be beneficial in identifying which particular institutions have a record of consistently denying loans from particular race/ethnic minorities.
  o Clarify Disparate impact by use of supplement HMDA data with variables such as Credit scores, “loan-to-value” ratios, and “debt-to-income” ratios.
  o Conducted “matched-pair file reviews” of companies showing high disparities in odds of approval for minority borrowers.
  o Conduct GIS analysis of individual intuition’s lending practices in order to identify failure to provide equal lending services to minority neighborhoods (ie. red lining).

- **Recognize Good Lenders:**
  o Acknowledge institutions that evidence a lack of racial differences in lending with “Best Practices.”
  o Invite lenders with best practices to participate in programs to build greater homeownership in RCAPs.

**NATIONAL ORIGIN DISCRIMINATION**
Special protection needs to be given to immigrants and persons who are not proficient in English. These communities have been found to be the most disadvantaged in home seeking and targets of predatory actions as well as high levels of discrimination.

- **Language Access:**
  - Require real estate and mortgage transactions to be conducted through an interpreter and all documents be translated into home-seeker’s language.
  - Require that housing providers and lenders accord immigrants and persons who are not proficient in English reasonable accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford such persons equal opportunity to use and enjoy a dwelling because of their immigration status or lack of proficiency in English.

- **Limited English Proficient Testing**
  - Include systemic testing to detect discrimination against immigrants and persons who are not proficient in English because these individuals are very unlikely to report violations of the fair housing laws that they encounter.
  - Conduct “accented caller” testing

- **Provide protection for undocumented complainants**
  - Undocumented immigrants are often afraid to file complaints against abusive or discriminatory landlords for fear of deportation. A policy which protects immigrants from referral to U.S. Immigration and Customs Enforcement (ICE) is recommended.

**REGIONALIZATION OF FAIR HOUSING ENFORCEMENT AND PLANNING**

We have found that, based on information from the interviewees, fair housing policies, activities and enforcement differ significantly between and among urban and rural areas. Outside of the cities, there is little or no Fair Housing activity. While urban areas have educational outreach services and some level of investigation or enforcement, some rural areas reported that enforcement of fair housing law is viewed as an anti-business activity and therefore such efforts are directly or indirectly discouraged. Regionalization in fair housing enforcement and planning were received positively by most key informants interviewed and is clearly supported by the findings of this report and the research literature. A regional approach to fair housing enforcement and planning “makes good sense from both the programmatic and the economic standpoint.”

- **Regional Human Relations Commission:**
  - A strong Human Relations Commission is essential for helping our diverse community remain a place of harmony and peace. This Commission should have full authority to affirmatively promote Fair Housing at a regional level including the ability to enforce fair housing laws.

- **Policies and Codes:**
  - Develop regional template for policies and codes that could be adopted by all municipalities and towns within the region thus providing consistency for residents as they seek housing throughout the region.

- **Regional Enforceable Testing Program:**
Establish a regional Fair Housing Initiatives Program (FHIP) recipient to engage in enforceable paired testing and to investigate regional complaints.

Collect data on all complaints that allege discrimination against an existing protected class.

Collect data on all complaints that involve the denial of housing.

Track cases of systemic violations.

Conduct systemic testing on a regular basis in all communities to determine the nature and extent of the denial of housing.

Vigorously pursue civil and/or criminal penalties against violators.

ADDRESSING RCAPS

- Avoid gentrification
  
  o Stabilizing neighborhoods with incentives for existing homeowners such as low cost housing rehabilitation.

  o Follow one-for-one unit replacement for low cost housing in process of building new infrastructure

  o Be very cautious about de-concentration strategies. Most of the redevelopment and revitalization plans reviewed in Greensboro, High Point, Burlington, and Winston-Salem stress aesthetics, home-ownership, new and renovated housing, etc. But, there are few recommendations in these plans to address the general lack of affordable housing. Moreover, as communities are slated for revitalization much of the existing low-rent housing stock is converted to private home ownership. While this approach is very good for stabilizing the neighborhoods, it does so by bringing in home buyers from outside of the community and pricing existing low-income renters out of the neighborhoods. Care must be given to providing sufficient opportunities to existing residents either through loan assistance programs or rent subsidies.

  o Create neighborhood associations to empower RCAP communities. Moreover, pair these associations with modest Participatory Budgeting to allow residents in these neighborhoods to direct funding toward projects they feel are most vital in their communities.

- Encourage owner occupancy

  o Target full-time employed residents who currently rent for credit counseling programs that will increase credit-worthiness and eventually lead to home ownership.

  o Assist homeowners currently in the process of default or foreclosure to restructure loans and repayment plans taking advantage of current low mortgage rates.

- Housing code enforcement

  o Code enforcement was seen a potential way to overcome disparities in areas with Racial or Ethnic Concentrations of Poverty (R/ECAPS).

  o Buy back or seize vacant housing, as well as properties on which back taxes are owed, and turn them over to charitable groups. This was suggested as a way to reclaim housing stock in blighted neighborhoods and provide affordable choices.
A regional Rental Unit Certificate of Occupancy (RUCO) program, like the program that existed in Greensboro for a short time, would bring all rental housing units to an acceptable minimum housing standard.

- **Build infrastructure, school proficiency, jobs, and amenities:**
  - Increase funding of public schools in R/ECAPs to address very low School Proficiency Index scores.
  - Discourage city/county school districts (such as in Davidson County) that have led to high levels of segregated schools and limited attempts to integrate neighborhoods.
  - Encourage placement of supermarket or farmer’s markets via low cost properties or tax incentives.
  - Encourage development of neighborhood businesses through small business loans and training from the U.S. Small Business Administration.
  - Establish medical clinics in R/ECAPs.
  - Discourage placement of Tax Credit and other Public Assisted housing units in these areas; encourage instead the development of low-cost, owner-occupied units including townhouses, duplexes, as well as starter homes.
  - Encourage placement of high-quality, subsidized childcare in RCAP neighborhoods.
  - In areas with poor infrastructure: re-pave roads, fix sidewalks and street lights, provide bus stop benches, and improve parks and other public amenities.

- **Address Crime and Safety:**
  - R/ECAPs in the Piedmont Triad had some of the highest personal and property crime indices in the region. Collaborative community policing campaigns should be instituted to address crime rates.

**Areas of Opportunity**
Public investment should capitalize on areas that have been identified in this report as having high opportunities in access to jobs, good school proficiency scores, high employment, good amenities, etc.

- **Transportation:**
  - In order to increase diversity in high opportunities areas, they must become more accessible to lower income residents. While housing choice programs may provide low-income residents with vouchers that could be used in these areas, lack of public transit may prohibit options to move to areas of high opportunity.
  - Transportation throughout the region is a constant issue, especially for low-income, disabled, and elderly. Inter-county transportation options would significantly increase housing choice for protected classes. Increased transportation options for the elderly and the handicapped were also seen as beneficial.

- **Mixed income housing:**
  - Public-private investment in mixed-income housing in areas of high opportunity, when coupled with increased transportation choices, provides the infrastructure necessary for the development of diverse neighborhoods.
Housing Choice Voucher programs should target rental properties within these areas. When combined with better transportation, the effect will be to deconcentrate poverty and increase diversity within areas that have better schools, amenities, and other opportunities.