



CITY OF HIGH POINT

*211 S Hamilton Street
High Point, NC 27260*

Analysis of Impediments to Fair Housing Choice for FY 2020

June 15, 2020



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Executive Summary

The City of High Point, North Carolina is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant Program (CDBG) and the Participating Jurisdiction (PJ) for the HOME Investment Partnership (HOME) Program. In accordance with the Housing and Community Development Act of 1974, as amended, each entitlement community must "affirmatively further fair housing." In order to demonstrate that the entitlement community is "affirmatively furthering fair housing," each community must conduct an Analysis of Impediments of Fair to Housing Choice (AI) which identifies any impediments to fair housing choice and what steps it will take to affirmatively further fair housing. HUD advises communities that the Analysis of Impediments to Fair Housing should also address the Fair Housing Act, Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Section 109 of Title I of the Housing and Community Development Act of 1974, Title II of the Americans with Disabilities Act of 1990, Architectural Barriers Act of 1968, Age Discrimination Act of 1975, Title IX of the Education Amendments Act of 1972, Executive Order 11063, Executive Order 11246, Executive Order 12892, Executive Order 12898, Executive Order 13166, and Executive Order 13217.



The HUD Fair Housing and Equal Opportunity (FHEO) Office has advised Federal entitlement communities to update their AI to coincide with their Five Year Consolidated Plan, and then every five (5) years thereafter. As part of its Annual Action Plan, each entitlement City must additionally sign certifications every year stating that the City will affirmatively further fair housing. This means that the City will conduct an AI, take appropriate actions to overcome the effects of any impediments identified through the AI, and maintain records reflecting what analysis and corrective actions were taken.

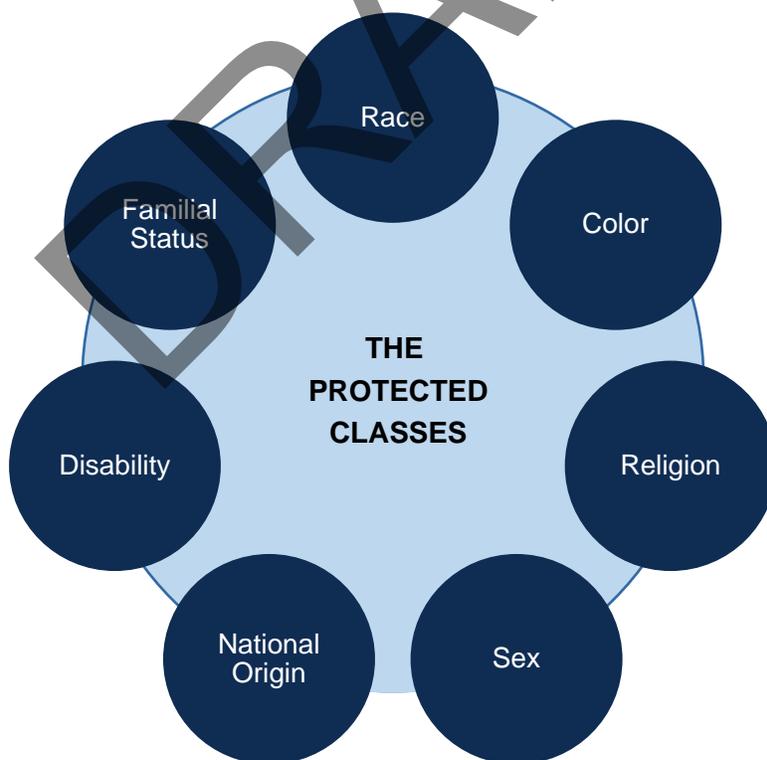
The City of High Point previously prepared an Analysis of Impediments to Fair Housing Choice in 2015, and has prepared a new Analysis of Impediments to Fair Housing Choice for 2020-2024. The findings produced through this analysis will be further addressed in the City's FY 2020-2024 Five Year Consolidated Plan.

This analysis focuses on the status and interaction of six (6) fundamental conditions within the City of High Point:

- The sale or rental of dwellings (public or private);
- The provision of housing brokerage services;
- The provision of financial assistance for dwellings;

- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly assisted housing;
- The administrative policies concerning community development and housing activities, which affect opportunities for minority households to select housing inside or outside areas of minority concentration; and
- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by HUD regarding assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 570.

The Fair Housing Act was originally passed in 1968 to protect buyers and renters from discrimination from sellers and landlords by making it unlawful to refuse to sell or rent property to persons included under the category of a protected class. The Fair Housing Act prohibits discrimination against persons based on their *race, color, religion, sex, national origin, disability, or familial status* in the sale, rental, and financing of housing.



As population shifts and economic trends grow, Fair Housing issues vary drastically between jurisdictions and regions. Therefore, the City of High Point is taking a more efficient and proactive approach towards affirmatively furthering fair housing choice for residents on both a local level and a regional level.

The City of High Point has produced beneficial insight into the issues affecting the housing market of the City. While certain fair housing issues are regional in scale, this AI strives to identify strategies and goals it can take to address the barriers that are impacting Fair Housing Choice for the City's residents.

The methodology employed to undertake this Analysis of Impediments included:

- **Research**
 - A review was performed of the City of High Point's zoning ordinance.
 - A review of The Housing Authority of the City of High Point's Affirmative Marketing Plan.
 - The most recent demographic data for the City and County was analyzed from the U.S. Census, which included general, demographic, housing, economic, social, and disability characteristics.
 - A review of the U.S. Department of Housing and Urban Development Comprehensive Housing Affordability Strategy (HUD-CHAS) data was undertaken.
 - A review of financial lending institutions through the Home Mortgage Disclosure Act (HMDA) database was completed.
 - A review of the real estate and mortgage practices was undertaken.
 - Home mortgage foreclosure data was also reviewed.
- **In-Person Meetings/Interviews**
 - Meetings were conducted with the following:
 - High Point Management Team
 - City of High Point Human Relations Division
 - City of High Point Fire Department
 - City of High Point Police Department
 - High Point Economic Development Corporation
 - City of High Point Parks & Recreation
 - City of High Point Engineering Services
 - City of High Point Information Technology
 - Burns Hill Neighborhood Association
 - Welfare Reform Liaison Project
 - Guilford Technical Community College
 - High Point Market Authority

- Guilford County Schools
- High Point Realtors Association
- The ARC of High Point
- Triad Health Project
- FaithHealthNC
- Piedmont Health Services & Sickle Cell Agency
- The Foundation for a Healthy High Point
- Partners Ending Homelessness
- High Point Community Foundation
- Highland – Rankin – Ward Street Methodist Churches
- Tiny House Community Development
- Housing Consultants Group
- Triad Lifestyle Realty
- The Housing Authority of the City of High Point
- High Point Museum
- West Side Neighborhood Association
- Macedonia Neighborhood Association
- West End Neighborhood Association
- Mental Health Associates of the Triad
- Triad Adult Day Care Center, Inc.
- Caring Services, Inc.
- Guilford County Family Justice Center
- Sandhills Center
- Greater High Point Food Alliance
- Roy B. Culler Senior Center
- Operation Xcel
- United Way of Greater High Point
- Senior Resources of Guilford County
- YWCA of High Point
- **Phone Interviews**
 - Phone interviews were conducted with the following:
 - City of High Point Transportation Department
 - City of High Point Planning Department
 - Surveys were sent to each housing, social service, and community development agency that was invited to the roundtable discussions. Follow up phone calls were made when an organization neither returned a survey nor attended a meeting.
- **Analysis of Data**

- Low- and moderate-income areas were identified and mapped.
- Concentrations of minority populations were identified and mapped.
- Concentrations of owner-occupied and renter-occupied housing units were identified and mapped.
- Fair housing awareness in the community was evaluated.
- The locations of Housing Cost Burdens throughout the City were analyzed.
- The locations of CDBG and HOME expenditures throughout the area were analyzed.
- The City's Five Year Goals and Objectives were reviewed.
- **Potential Impediments**
 - Public sector policies that may be viewed as impediments were analyzed.
 - Private sector policies that may be viewed as impediments were analyzed.
 - The status of previously identified impediments was analyzed.
- **Citizen Participation**
 - Electronic copies of a fair housing survey were made available on the City of High Point's Community Development & Housing website. The online survey produced 28 responses in English and no responses in Spanish. See copy of survey form in the Appendix Section (Appendix B).
 - The City of High Point held two (2) public meetings to engage the public and local organizations/agencies and help identify issues impacting Fair Housing Choice. The first public meeting was held on Monday, December 9, 2019 at the Morehead Recreation Center and the second public meeting was held on Tuesday, December 10, 2019 at the Morgan Room of the High Point Library.
 - Notices for the public meetings were published in the "The High Point Enterprise," the local newspaper of general circulation in the area.
 - The City of High Point met with representatives from thirty-three (33) local housing, community development, realtors, and social service organizations through a series of small group discussions. These were held with the following types of organizations:
 - The Housing Authority of the City of High Point
 - Community Organizations
 - Economic Development Organizations
 - Education Providers
 - Fair Housing Organizations
 - Housing Providers
 - Health Care Organizations
 - Homeless Service Providers

- Public Safety
- Social Service Providers
- The City of High Point conducted phone interviews with three (3) additional City Departments who were unable to attend the public hearings or individual group meetings.
- The 2020-2024 Analysis of Impediments to Fair Housing Choice was made available on the City of High Point's website at <https://www.highpointnc.gov/1622/Fair-Housing>, and a hardcopy could be delivered on request through the City's Public Records Request portal at <https://www.highpointnc.gov/1813/Public-Records-Request> from June 15, 2020 to July 14, 2020.
- The City of High Point held two Public Hearings on the "draft" 2020-2024 Analysis of Impediments on May 4, 2020.

Based on the data analysis and citizen participation process, the City staff in High Point identified the following issues impacting fair housing choice in the area:

- **Housing Opportunities:**
 - There is a shortage of affordable housing in the City of High Point that is decent, safe, and sanitary.
 - There is a lack of Federal and State funds for housing subsidies and the development of new affordable housing is not economically feasible for private developers.
 - There is a shortage of affordable housing units in areas of opportunity where low-income persons and households may move.
 - The population of the City of High Point has been growing, but the housing supply has not increased at the same rate as the population.
 - The number of renter-occupied units has been increasing as the number of owner-occupied units has been decreasing in the City of High Point.
 - There is enough vacant land for infill housing, but a lack of financial incentives to develop affordable housing on the vacant land by public, private, and non-profit developers.
- **Housing Choice:**
 - Housing units that are deteriorated and below code standards tend to be available at affordable rents.
 - Affordable housing units are concentrated in neighborhoods that are segregated by race or ethnicity in addition to income.

- The special needs population in the City of High Point has increased in the last 15 years, but landlords are frequently unwilling to make reasonable modifications and accommodations to their units.
- There are physical, economic, and social justice barriers that impede the development of new affordable and accessible housing in the City of High Point.
- There is a lack of "mixed-income" housing being built in the City.
- There is a high demand for elderly housing in the City.
- New affordable rental housing in the City of High Point can face opposition from the public and "NIMBYism."
- **Cost Overburden:**
 - Lower household incomes create cost overburdened housing conditions; approximately 24.1% of homeowners and 55.7% of renters in the City are cost overburdened of 30% or more.
 - Individuals and families in the lowest-income areas struggle to find high wage jobs.
 - The elderly, on fixed income, cannot afford to make the repairs, alterations, and accommodations to their homes to make them accessible to their needs.
 - Housing rehabilitation prices are inflated, especially in the Core City, and older housing stock becomes economically infeasible for homeowners to rehabilitate.
 - Property appraisals will often consider the area surrounding a house, particularly in low-income neighborhoods, discouraging investment.
- **Disability/Accessibility:**
 - There is a lack of housing in the City that is accessible and affordable for the elderly, the disabled, and persons with special needs.
 - The denial by some landlords to make reasonable modifications and accommodations limits the amount of accessible units in the City that are for rent for persons with special needs.
- **Fair Housing:**
 - Tenants and homebuyers do not always file housing discrimination complaints when they have been discriminated against, either because they do not know about the Fair Housing Act or they do not know where to report complaints.
 - Property appraisals will often create de facto redlining by considering the neighborhood and discouraging investment or steering potential homebuyers that may rehabilitate housing.
 - According to stakeholders, some realtors in the area have been steering homebuyers using coded language.
 - Fair Housing training for realtors is an elective with hourly requirements.

- The State zoning code has created distance requirements for group homes, though this is currently being adjudicated in court.
 - According to stakeholders, Quid Pro Quo sexual assault and hostile environment issues with Fair Housing have been increasing
 - Persons with Limited English Proficiency (LEP) do not always have a fair housing choice.
 - There is a lack of awareness of tenants' rights and landlords' responsibilities, including what reasonable modifications and accommodations are.
- **Access/Mobility:**
 - The limited public transportation network in the City is not convenient for lower income households to go to: work, health care, shopping, etc., which limits the choices where a low-income household can live.
 - The City of High Point is not designed for walkability, and there is a need for sidewalks in many portions of the City.
 - Landlords will frequently refuse to make reasonable modifications and accommodations, and discriminate against elderly tenants.
 - Families and individuals have a right to live wherever they choose if affordable housing is available outside areas of concentration of low income or racial concentration.

Using these findings, the City of High Point developed the following impediments for the 2020-2024 Analysis of Impediments to Fair Housing Choice and defined specific goals and strategies to address each impediment.

- **Impediment 1: Lack of Affordable Housing**

There is a lack of affordable housing in the City of High Point caused by the population growth in the Piedmont Region of North Carolina. This has created a high demand on a limited supply of housing, and a corresponding increase in the price of rent and the sales price of housing.

Goal: Increase the supply of affordable housing through new construction and rehabilitation of housing.

Strategies: In order to address the need and achieve the goal for more affordable housing, the following activities and strategies should be undertaken:

- **1-A:** Continue to promote the need for affordable housing by supporting and encouraging private developers and non-profits to develop, construct, and/or rehabilitate housing which is affordable.

- **1-B:** Encourage and promote the development, construction, and/or rehabilitation of mixed-income housing in the city.
- **1-C:** Financially support the rehabilitation of existing housing owned by seniors and lower-income households to conserve the existing affordable housing stock in the city.
- **1-D:** Provide financial and development incentives to private developers and non-profits which construct and/or rehabilitate affordable housing.

• **Impediment 2: Lack of Accessible Housing**

There is a lack of accessible housing in the City of High Point since the supply of accessible housing has not kept pace with the demand caused by the increase in the number of elderly persons in the city and the desire of disabled persons who want to live independently.

Goal: Increase the supply of accessible housing through new construction and rehabilitation of accessible housing for persons who are disabled and the elderly.

Strategies: In order to address the need and achieve the goal for more accessible housing, the following activities and strategies should be undertaken:

- **2-A:** Continue to encourage and promote supply of accessible housing by supporting and encouraging private developers and non-profits to develop, construct, and/or rehabilitate housing that is accessible to the elderly and persons who are disabled.
- **2-B:** Financially assist in improvements to single-family owner-occupied homes to make them accessible for the elderly and/or disabled so they can continue to remain in their homes.
- **2-C:** Encourage and promote the development of accessible housing units in multi-family buildings as a percentage of the total number of housing units.
- **2-D:** Encourage landlords to make reasonable accommodations to units and buildings so persons who are disabled can continue to reside in their rental units.
- **2-E:** Enforce the Americans with Disabilities Act (ADA) and the Fair Housing Act (FHA) in regard to making new multi-family housing developments accessible and visitor-friendly for persons who are physically disabled.

• **Impediment 3: Barriers Limiting Housing Choice**

There are physical, economic, and social barriers in the City of High Point which limit housing choices and housing opportunities for low-income households, minorities, and the disabled members of the city's population.

Goal: Eliminate physical, economic, and social barriers in the City of High Point and increase housing choices and opportunities for low-income households and members of the protected classes throughout the city.

Strategies: In order to achieve the goal for better housing choice, the following activities and strategies should be undertaken:

- **3-A:** Deconcentrate pockets of racial and ethnic poverty by providing affordable housing choices for persons and families who want to reside outside impacted areas.
- **3-B:** Support and promote the development of affordable housing in areas of opportunity so minority and low-income persons and families may have a choice to reside there.
- **3-C:** Promote and encourage homeownership initiatives for low-income households to build community wealth and create neighborhoods of choice.
- **3-D:** Support and provide subsidies to promote housing investment in the central core of the city and overcome low housing appraisals in core neighborhoods.

• **Impediment 4: Lack of Fair Housing Awareness**

There is a continuing need to educate and promote the rights of individuals, families, and members of the protected classes in regard to the Fair Housing Act (FHA), awareness of discriminatory practices, and combatting "NIMBYism."

Goal: Improve knowledge and awareness of the Fair Housing Act (FHA), related housing and discrimination laws, and regulations, so that the City of High Point can Affirmatively Further Fair Housing (AFFH) and eliminate the negative attitude of "Not In My Back Yard" (NIMBYism).

Strategies: In order to address the need and achieve the goal of promoting open and fair housing, the following activities and strategies should be undertaken:

- **4-A:** Continue to educate and make residents aware of their rights under the Fair Housing Act (FHA) and the Americans with Disabilities Act (ADA).

- **4-B:** Continue to educate and make realtors, bankers, and landlords aware of discriminatory housing policies and promote fair housing opportunities for all residents of the City of High Point.
- **4-C:** Continue to educate real estate appraisers about property values to discourage “de facto redlining” created by low property appraisals.
- **4-D:** Continue to support the High Point Human Relations Division to assist persons who may be victims of housing discrimination and/or are not aware of how to file a housing complaint.
- **4-E:** Continue to monitor the data from the Home Mortgage Disclosure Act (HMDA) to ensure that discriminatory practices in home mortgage lending are not taking place.
- **4-F:** Publish and distribute housing information and applications in both English and Spanish to address and inform the non-English speaking residents in the City of High Point.
- **4-G:** Continue to educate homebuyers about “predatory lending,” “steering,” and “redlining,” to eliminate deceitful practices when purchasing or selling a home.
- **4-H:** Educate residents and local officials to prevent them from pressuring to enact, or enacting and applying zoning or land use laws based on fears, prejudices, stereotypes, or unsubstantiated assumptions of community members to combat “NIMBYism.” See Joint HUD-DOJ Statement for guidance (Appendix E).
- **4-I:** Educate and train local elected and appointed officials regarding discriminatory practices when enacting or applying zoning or land use laws, and that acquiescence to community bias can be considered discriminatory. See Joint HUD-DOJ Statement for guidance (Appendix E).

- **Impediment 5: Lack of Economic Opportunities**

There are a lack of economic opportunities in the City of High Point for lower-income households to increase their income and thus improve their choice of housing.

Goal: Increase the employment opportunities and access to jobs in the City of High Point, which will increase household income and make it financially feasible to live outside concentrated areas of poverty.

Strategies: In order to address the need and achieve the goal for better economic opportunities, the following activities and strategies should be undertaken:

- **5-A:** Encourage and strengthen partnerships between public and private entities to promote economic development, improve the local tax base, and create a sustainable economy.
- **5-B:** Promote and encourage the expansion of existing commercial and light industrial enterprises, and small-scale manufacturing, which will create more employment opportunities.
- **5-C:** Provide financial and development assistance to enterprises, through workforce development and job training which will create higher wages.
- **5-D:** Identify development sites for potential private investment and/or expansion of existing enterprises.
- **5-E:** Support the increase in the number of bus routes and hours of operation in the City so low-income workers will have access to job opportunities outside their neighborhood.
- **5-F:** Promote and encourage wealth-building initiatives, such as Individual Development Accounts (IDA), for low-income populations, immigrants, and refugees who are cost overburdened and living under the area median income.

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I. Introduction

The City of High Point, NC is an entitlement community under the U.S. Department of Housing and Urban Development's (HUD) Community Development Block Grant (CDBG) Program and the Participating Jurisdiction (PJ) for the HOME Investment Partnership (HOME) Program. In accordance with the Housing and Community Development Act of 1974, as amended, each entitlement community must "affirmatively further fair housing." In order to demonstrate that the entitlement community is "affirmatively further fair housing," the community must conduct an Analysis of Impediments to Fair Housing Choice which identifies any impediments to fair housing choice and what steps it will take to affirmatively further fair housing. The HUD Fair Housing and Equal Opportunity (FHEO) Office has advised the Federal entitlement communities to prepare a new Analysis of Impediments to Fair Housing Choice to coincide with the Five Year Consolidated Plan, and then every five (5) years thereafter.

HUD defines "fair housing choice" as:

"The ability of persons, regardless of race, color, religion, sex, national origin, familial status, or handicap, of similar income levels to have available to them the same housing choices"

This Analysis of Impediments to Fair Housing Choice consists of the following six (6) conditions:

- The sale or rental of dwellings (public or private);
- The provision of housing brokerage services;
- The provision of financial assistance for dwellings;
- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly assisted housing;
- The administrative policies concerning community development and housing activities, which affect opportunities of minority households to select housing inside or outside areas of minority concentration; and
- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by HUD regarding assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition,

including actions involving the expenditure of funds made available under 24 CFR Part 570.

HUD-FHEO suggests that communities conducting an AI should consider the policies concerning “visitability,” in Section 504 of the Rehabilitation Act, the Americans with Disabilities Act, and the Fair Housing Act. Housing that is “visitable” means that it has the most basic level of accessibility that enables persons with disabilities to visit the home of a friend, family member, or neighbor.

- “Visitable” housing has at least one accessible means of ingress/egress, and all interior and bathroom doorways have as a minimum a 32-inch clear opening.
- Section 504 of the Rehabilitation Act (24 CFR Part 8), known simply as “Section 504,” prohibits discrimination against persons with disabilities in any program receiving Federal financial assistance.
- The Americans with Disabilities Act (42 U.S.C. 12131; 47 U.S.C. 155, 201, 218, and 225) (ADA) prohibits discrimination against persons with disabilities in all programs and activities sponsored by state and local governments.
- The Fair Housing Act requires property owners to make reasonable modifications to units and/or public areas in order to allow a disabled tenant to make full use of the housing unit. Additionally, property owners are required to make reasonable accommodations to rules or procedures to afford a disabled tenant the full use of the housing unit.

In regard to local zoning ordinances, the Fair Housing Act prohibits local government from making zoning or land use decisions, or implementing land use policies that exclude or discriminate against persons of a protected class.

The City of High Point previously prepared an AI in 2015. The City of High Point has prepared this 2020-2024 AI as an update to that plan. The findings produced through this analysis will be further addressed in the City’s FY 2020-2024 Five Year Consolidated Plan.

The document is designed to act as a planning tool, providing the City of High Point with the necessary framework to strategically address any identified impediments to fair housing choice over the next five (5) years and continue to make modifications based on events and activities in the community during that time period.

In order to affirmatively further fair housing, the City of High Point must look beyond the boundaries of the City and coordinate fair housing with Guilford County, the

City of Greensboro, and the Greater Piedmont Region. The City of High Point must also coordinate fair housing efforts with High Point University, which has a large housing and economic footprint in the City. Fair housing choice is the central goal of the AI, which stresses that opportunities should be available to low-income residents and members of the protected classes who may want to live in or around the City of High Point.

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II. Background Data

Description

High Point is the third largest City of the Piedmont Triad Region of North Carolina, behind Greensboro and Winston-Salem, and the second largest city in the Greensboro-High Point MSA. Though primarily located in Guilford County, portions of the City of High Point are also located in Davidson, Randolph, and Forsyth Counties. As of the 2010 census, the City had a total population of 104,677 residents and its Metropolitan Statistical Area had a population of 751,590. The Piedmont Triad region has been growing substantially, and its population was 1,639,944 in 2017.

High Point has historically been associated with the furniture industry, and holds a bi-annual furniture market that draws buyers from all over the world. Downtown High Point features multiple furniture showrooms catering to the furniture market, and the furniture industry continues to employ a large amount of residents, though the focus has shifted from manufacturing to design. Additionally, High Point is home to High Point University, which is a private liberal arts university affiliated with the United Methodist Church. The university has approximately 5,200 students, most of whom live on or near campus.

The population of High Point has grown since the turn of the century, both through domestic and international immigration. High Point's population according to 2017 American Community Survey (ACS) estimates is 111,513.

A. Population, Race, Ethnicity, and Religion

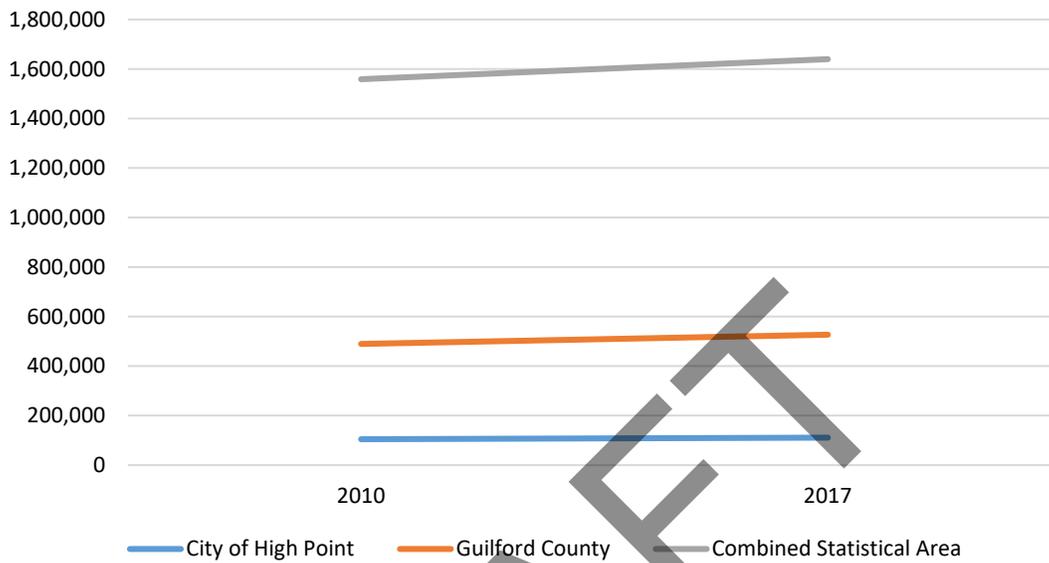
Population

High Point's population increased from 104,677 people in 2010 to 109,849 people in 2017 (an increase of 4.9 percent).

Population across the entire Greensboro-High Point Metropolitan Area, and the entire Piedmont Region, increased from 2010 to 2017.

Figure II-A-1

Population Change for the City of High Point



Source: 2010 U.S. Census and 2013-2017 ACS

Though the entire region grew, only a small portion of the regional growth and the growth in Guilford County was located in High Point.

Race

The following table highlights the racial composition of High Point at the time of the 2012 and 2017 American Community Surveys.

Table II-A-1: Race and Hispanic or Latino Population in High Point

Race and Hispanic or Latino	2008-2012 ACS		2013-2017 ACS	
	#	%	#	%
Total	104,394	100%	109,849	100%
One race	102,695	98.4%	106,853	97.2%
White alone	56,925	54.5%	56,410	51.4%

Black or African American alone	34,646	33.2%	37,395	34.0%
American Indian and Alaska Native alone	545	0.5%	420	0.4%
Asian alone	6,939	6.6%	8,980	8.2%
Native Hawaiian and Other Pacific Islander alone	0	0%	64	0.1%
Some other race alone	3,640	3.5%	3,584	3.3%
Hispanic or Latino	8,752	8.4%	11,133	10.1%

Source: 2010 U.S. Census and 2013-2017 ACS

The most common race identified in High Point in 2012 was White alone with 56,925 residents comprising 54.5% percent of the population. The second most common race identified in High Point in 2012 was Black or African American alone with 34,646 residents comprising of 33.2% percent of the population.

The most common race identified in High Point in 2017 was White alone with 56,410 residents comprising 51.4% percent of the population. The second most common race identified in High Point in 2017 was Black or African American alone with 37,395 residents comprising of 34.0% percent of the population.

There was not any change in proportional representation in High Point from 2012 to 2017 that was larger than 5.0 percentage points

Ethnicity

The following table highlights the ethnicities of High Point residents at the time of the 2012 and 2017 American Community Surveys.

Table II-A-2: Ethnicity and Ancestry in High Point

ANCESTRY	2008-2012 ACS		2013-2017 ACS	
	#	%	#	%
Total population	104,394	100%	109,849	100%

Background Data

American	6,368	6.1%	6,417	5.8%
Arab	119	0.1%	764	0.7%
Czech	654	0.6%	204	0.2%
Danish	146	0.1%	151	0.1%
Dutch	695	0.7%	848	0.8%
English	8,500	8.1%	7,920	7.2%
French (except Basque)	1,262	1.2%	1,419	1.3%
French Canadian	348	0.3%	166	0.2%
German	9,440	9%	8,519	7.8%
Greek	365	0.3%	298	0.3%
Hungarian	213	0.2%	170	0.2%
Irish	7,785	7.5%	5,766	5.2%
Italian	3,406	3.3%	2,811	2.6%
Lithuanian	36	0%	123	0.1%
Norwegian	500	0.5%	125	0.1%
Polish	1,152	1.1%	1,501	1.4%
Portuguese	242	0.2%	252	0.2%
Russian	262	0.3%	272	0.2%
Scotch-Irish	2,434	2.3%	2,283	2.1%
Scottish	2,081	2%	2,004	1.8%
Slovak	199	0.2%	150	0.1%
Sub-Saharan African	1,570	1.5%	1,935	1.8%
Swedish	563	0.5%	558	0.5%
Swiss	90	0.1%	128	0.1%
Ukrainian	36	0%	184	0.2%
Welsh	401	0.4%	399	0.4%
West Indian (excluding Hispanic origin groups)	507	0.5%	387	0.4%

Other Groups	55,020	52.7%	64,095	58.3%
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Source: 2008-2012 and 2013-2017 ACS

The most common ancestral group identified in High Point in 2012 was German with 9,440 residents comprising 9 percent of the population. The second most common ancestral group identified in High Point in 2012 was English with 8,500 residents comprising of 8.1 percent of the population.

The most common ancestral group identified in High Point in 2017 was German with 8,519 residents comprising 7.8 percent of the population. The second most common ancestral group identified in High Point in 2017 was English with 7,920 residents comprising 7.2 percent of the population.

It is important to note that Other Groups make up the largest ancestral group throughout the City. These Other Groups include people with multiple ancestries, including African American and Hispanic populations. This was the only group with any change in proportional representation in High Point from 2012 to 2017 that was larger than 5.0 percentage points.

Another way to consider racial distribution in a community is to look at the dissimilarity indices for an area. The **Dissimilarity Index (DI)** is based on the data from the 2010 U.S. Census and ACS data which measures whether one particular group is evenly distributed across census tracts in the metropolitan area in the same way as another group. More specifically, the index represents the extent to which the distribution of any two (2) groups (racial, ethnic, etc.) differs across census tracts. While there are limitations due to outside factors and scale size, the Dissimilarity Index can provide an effective method of analyzing segregation and identifying trends in a community.

A high value indicates that the two groups tend to live in different tracts. 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. However, context is important in interpreting the dissimilarity index. The index measures the degree two groups are segregated in a particular geographic area; however, the index alone does not provide the location of the segregation within the geographic area.

Brown University has provided metro-area dissimilarity indices for 1990 to 2010. Governing Magazine has provided the dissimilarity index based on the 2013-2017 ACS Five Year Estimates. Data was not available at the City or County levels.

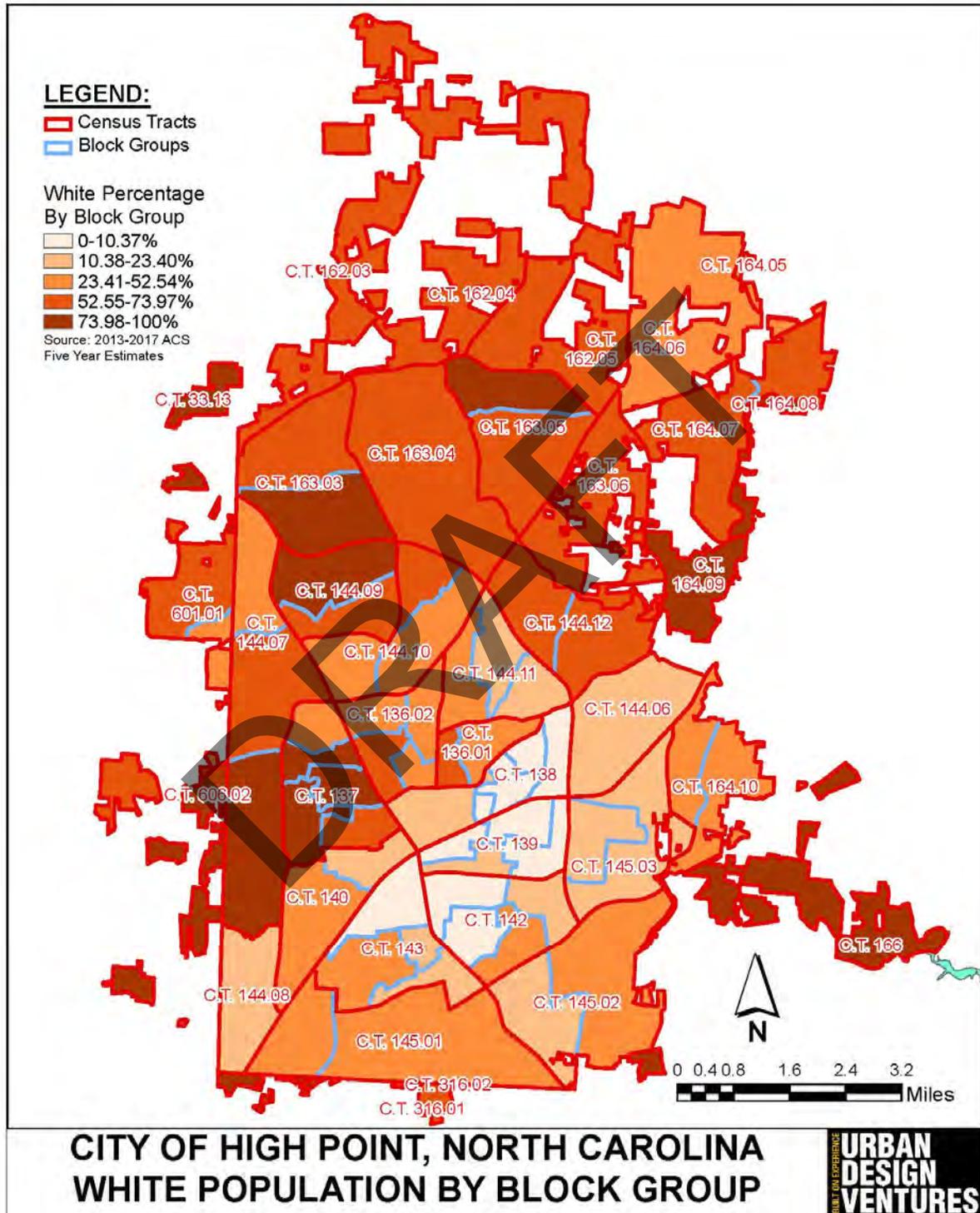
Table II-A-3: Dissimilarity Index in the Greensboro-High Point, NC MSA

Racial/Ethnic Dissimilarity Index	Greensboro-High Point, NC MSA			
	1990	2000	2010	2017
Black / White	46.4	43.0	39.0	53.3
Hispanic / White	78.2	62.4	53.8	42.9
Asian or Pacific Islander/White	78.0	62.6	54.3	54.8

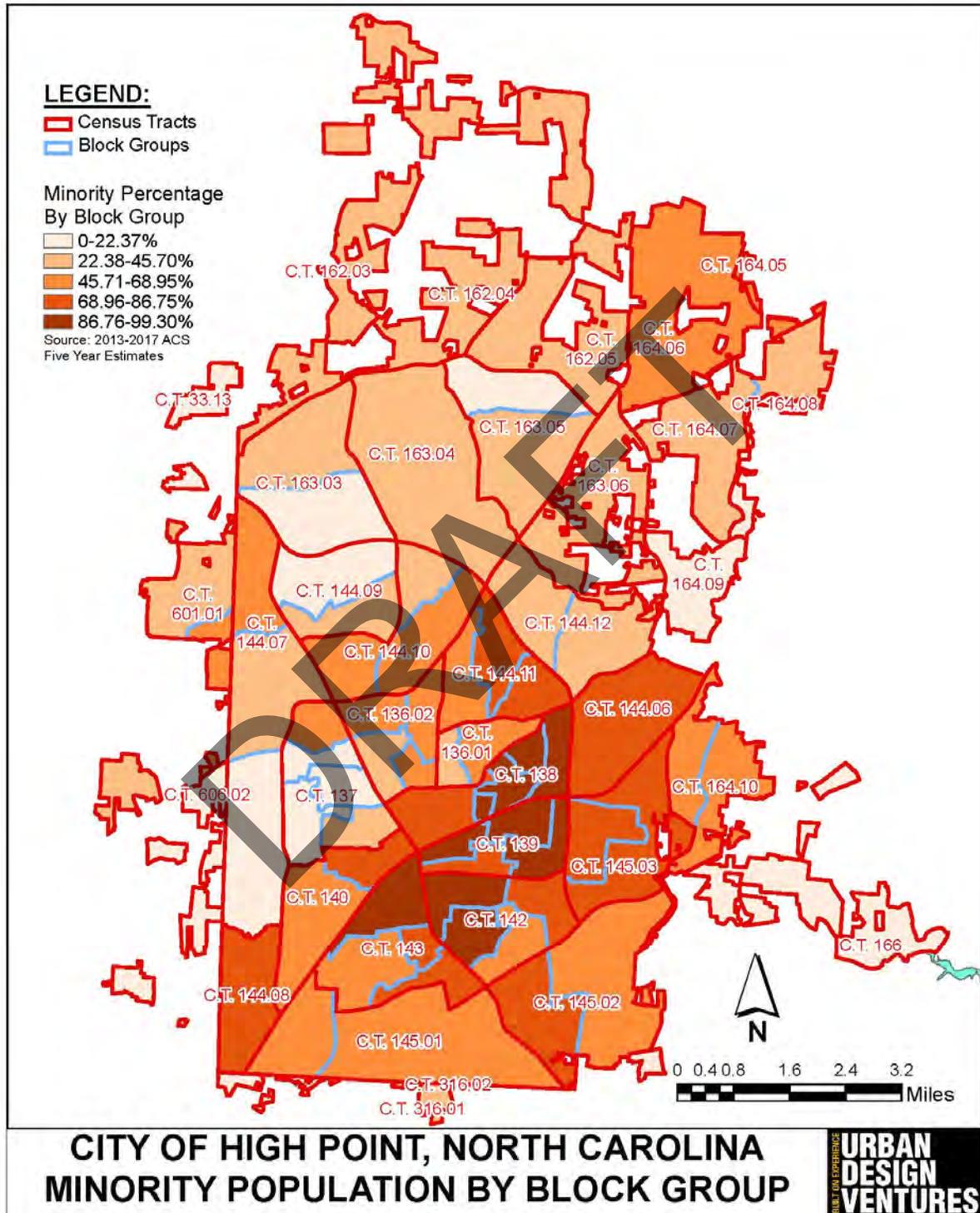
Source: 2000 U.S. Census & 2013-2017 ACS Estimates

The Dissimilarity Index (DI) trends among social/ethnicities in the Greensboro-High Point, NC MSA have diverged based on the race or ethnicity. According to the dissimilarity indices, the Greensboro-High Point region is moderately segregated. The Greensboro-High Point area had been growing less segregated from 1990 to 2010 in terms of White residents and Hispanic or White and Asian residents. However, the region has become more segregated between White and African American/Black residents since 2010.

Map II-A-1



Map II-A-2

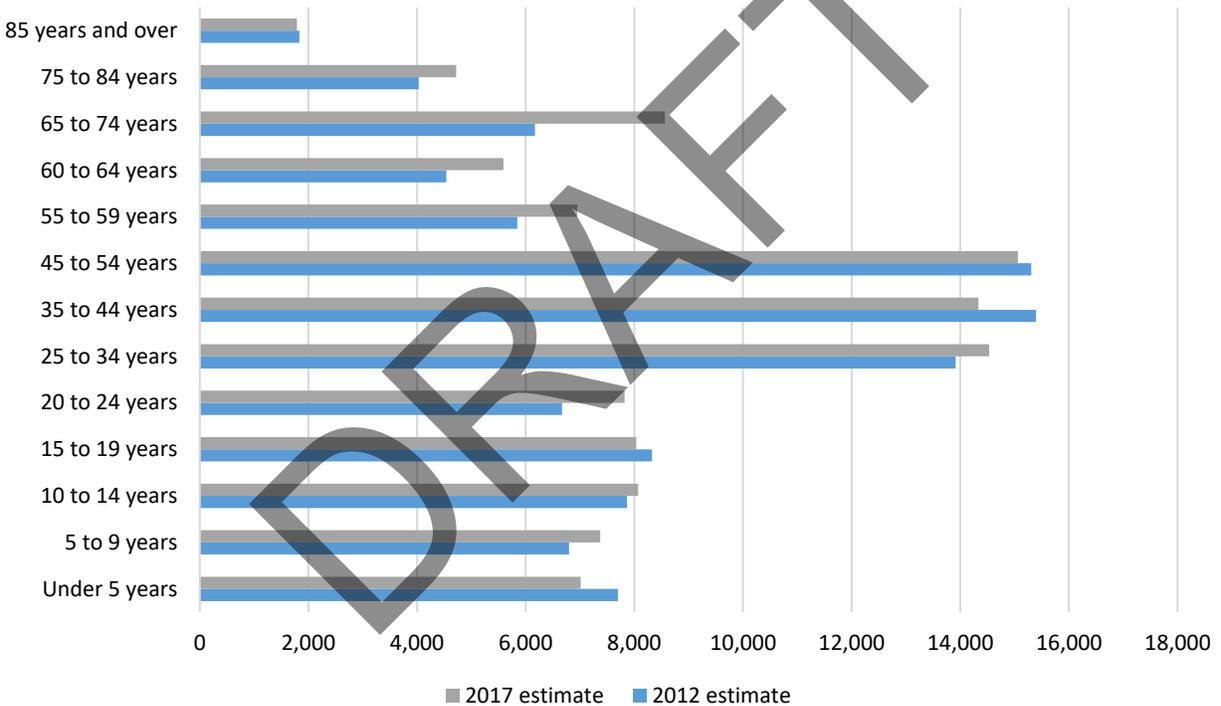


Age

The following chart illustrates age distribution in High Point at the time of the 2008-2012 ACS and 2013-2017 ACS. The Census shows that currently, children under 20 years of age represent 27.7 percent of the population; 33.3 percent of the population is between 20 and 45 years of age; 25.1 percent of the population is 45 to 65; and 13.7 percent of the population is 65 years of age and older. The median age is 36.4 years of age, but it was 35.5 in 2012, showing that the City is becoming older.

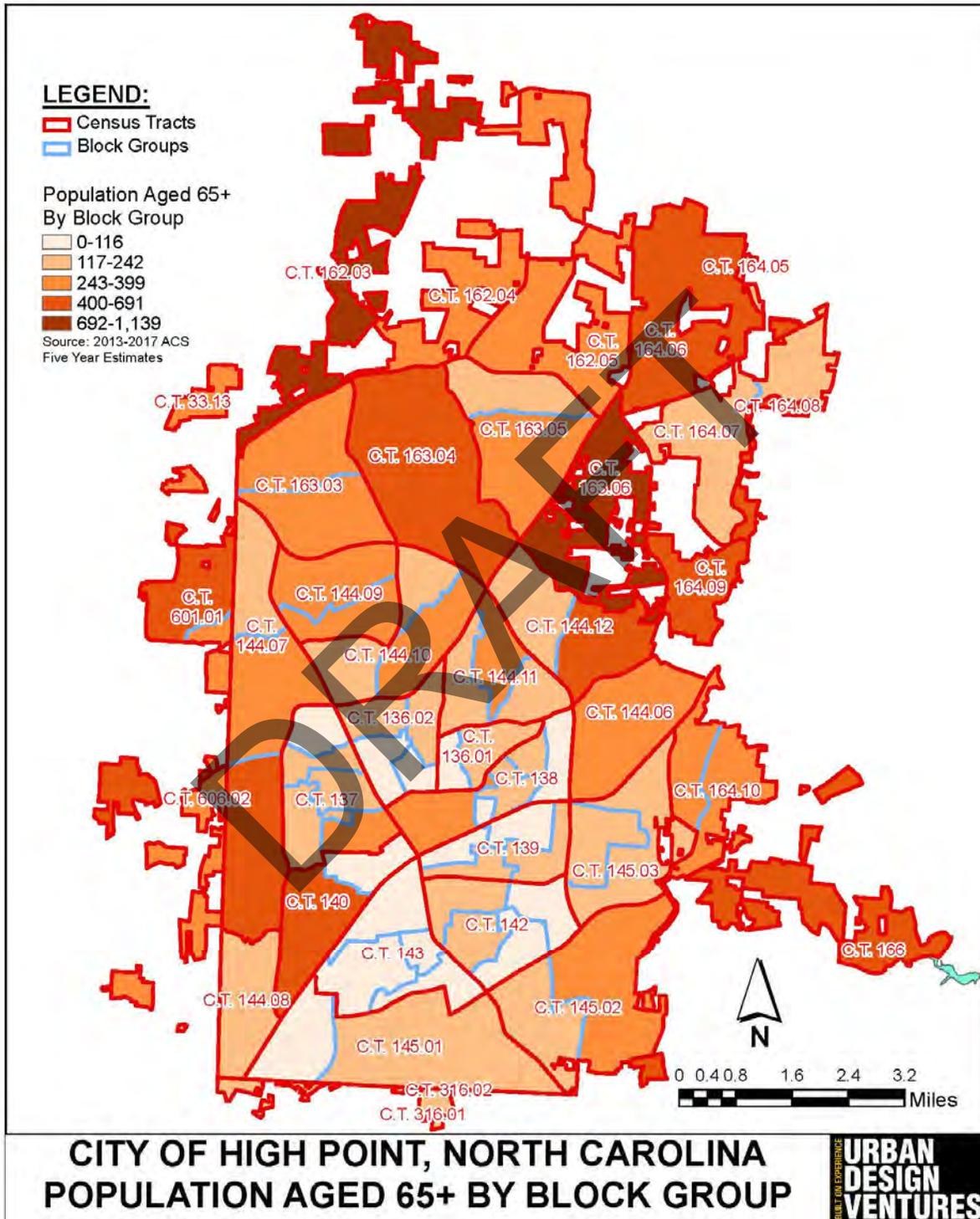
Figure II-A-2

Age Distribution and Change in the City of High Point

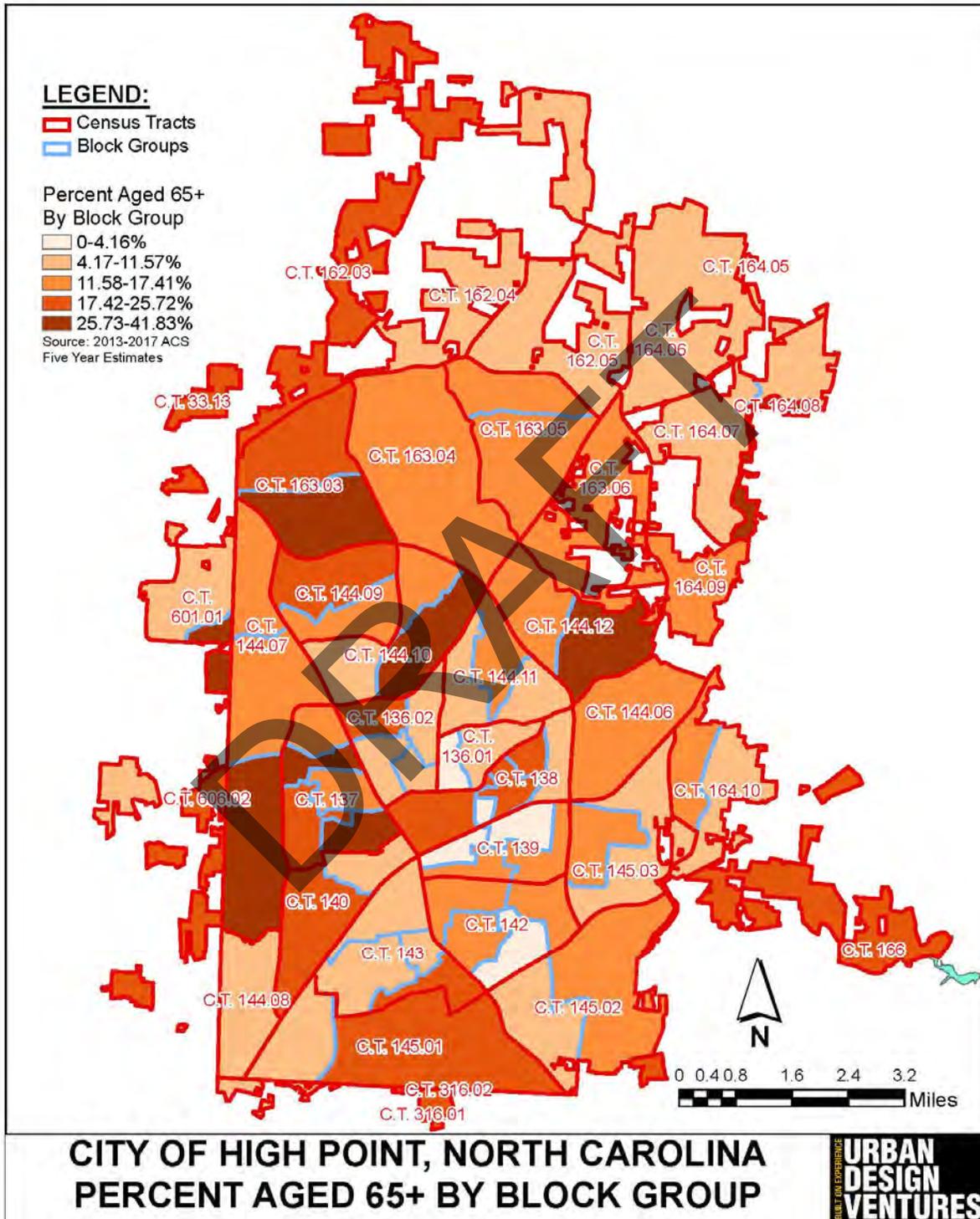


Source: 2008-2012 ACS and 2013-2017 ACS

Map II-A-3



Map II-A-4



Religion – Guilford County

The U.S. Census does not collect data on the religious affiliations of the population in the United States. In an effort to better understand the religious affiliations of the residents of Guilford County, the City used the data made available by The Association of Religion Data Archives (ARDA). ARDA surveys the congregation members, their children, and other people who regularly attend church services within counties across the country. Although this data appears to be the most comprehensive data that is available, it is unfortunately not entirely complete as it does not accurately include traditional African American denominations in the year 2000. The total number of regular attendees was adjusted in 2010 (the most recent year for which data is available) to represent the population including historic African American denominations. However, the total value cannot be disaggregated to determine the distribution across denominational groups.

The table below shows the distribution of residents of Guilford County across various denominational groups, as a percentage of the population which reported affiliation with a church.

Table II-A-4: Religious Affiliation in Guilford County

	1990		2000		2010	
	#	%	#	%	#	%
Total Population:	347,420	-	421,048	-	488,406	-
Evangelical Protestant	97,267	28.0%	84,662	20.1%	113,377	23.2%
Black Protestant	16,014	4.6%	0	0.0%	16,255	3.3%
Mainline Protestant	78,212	22.5%	81,243	19.3%	74,143	15.2%
Catholic	10,339	3.0%	21,628	5.1%	17,582	3.6%
Orthodox	0	0.0%	648	0.2%	540	0.1%
Other	3,658	1.0%	8,343	2.0%	14,164	2.9%
Total Adherents:	205,490	59.2%	196,524	46.8%	236,061	48.3%

Unclaimed:	141,930	40.9%	150,896	35.8%	252,345	51.7%
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Source: The Association of Religion Data

The most common religious affiliation that was identified in Guilford County in 1990 was Evangelical Protestant with 97,267 adherents comprising 28 percent of the population. The second most common religious affiliation identified in Guilford County in 1990 was Mainline Protestant with 78,212 adherents comprising 22.5 percent of the population.

The most common religious affiliation identified in Guilford County in 2010 was Evangelical Protestant with 113,377 members comprising 23.2 percent of the population. The second most common religious affiliation identified in Guilford County in 2010 was Mainline Protestant with 74,143 members comprising 15.2 percent of the population. It is important to note that the Association of Religion does not collect data on the number of adherents to the Islamic Faith, though these adherents are present in Guilford County as a minority religion.

B. Households

Household Tenure

According to the 2008-2012 American Community Survey, there were 45,669 housing units in High Point. Of these housing units: 40,038 (87.7%) were occupied and 5,631 (12.3%) were vacant. Of the occupied housing units: 23,672 (59.1%) were owner-occupied and 16,366 (40.9%) were renter-occupied.

According to the 2017 American Community Survey, there were 46,550 housing units in High Point. Of these housing units: 40,945 (88 percent) were occupied and 5,605 (12 percent) were vacant. Of the occupied housing units: 22,297 (54.5%) were owner-occupied and 18,648 (45.5%) were renter-occupied.

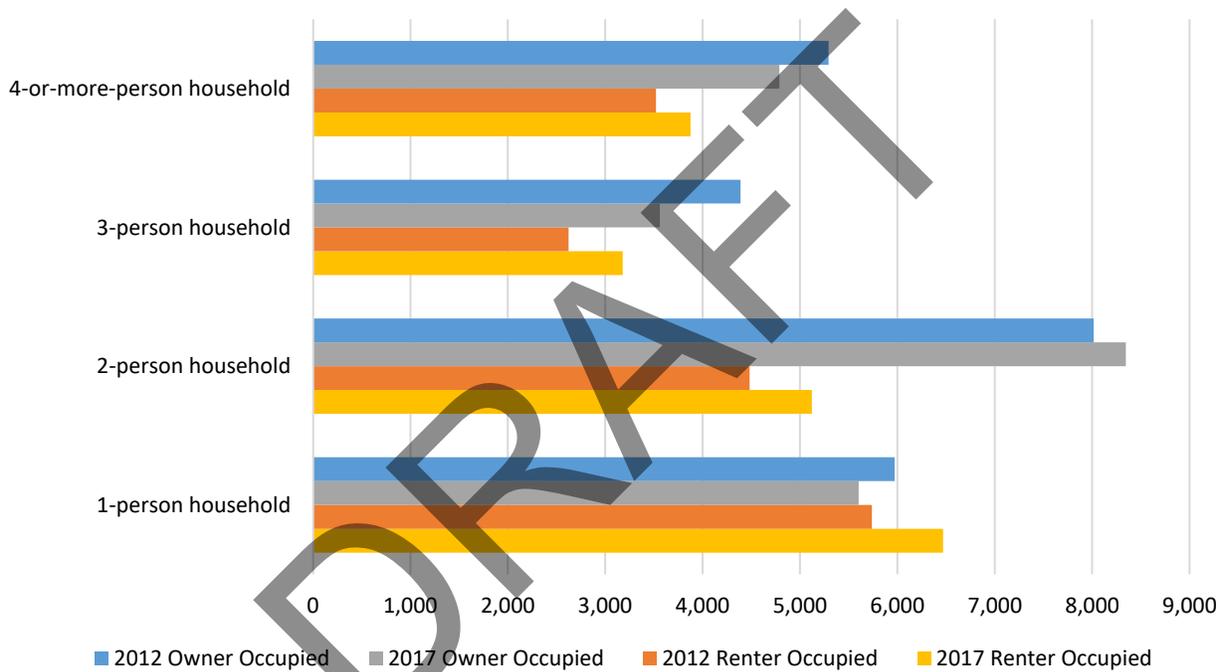
From 2008 to 2017 there was an 881 unit increase in the total number of housing units, a 907 unit increase (2.3 percentage point increase) in the number of occupied units, and a 26 unit decrease (0.5 percentage point decrease) in the number of vacant units. The number of owner-occupied

units decreased by 1,375 units (5.8 percentage point decrease) and the number of renter-occupied units increased by 2,282 units (13.9 percentage point increase).

There was a large increase in the number of renter-occupied units relative to the number of owner-occupied units from 2012 to 2017.

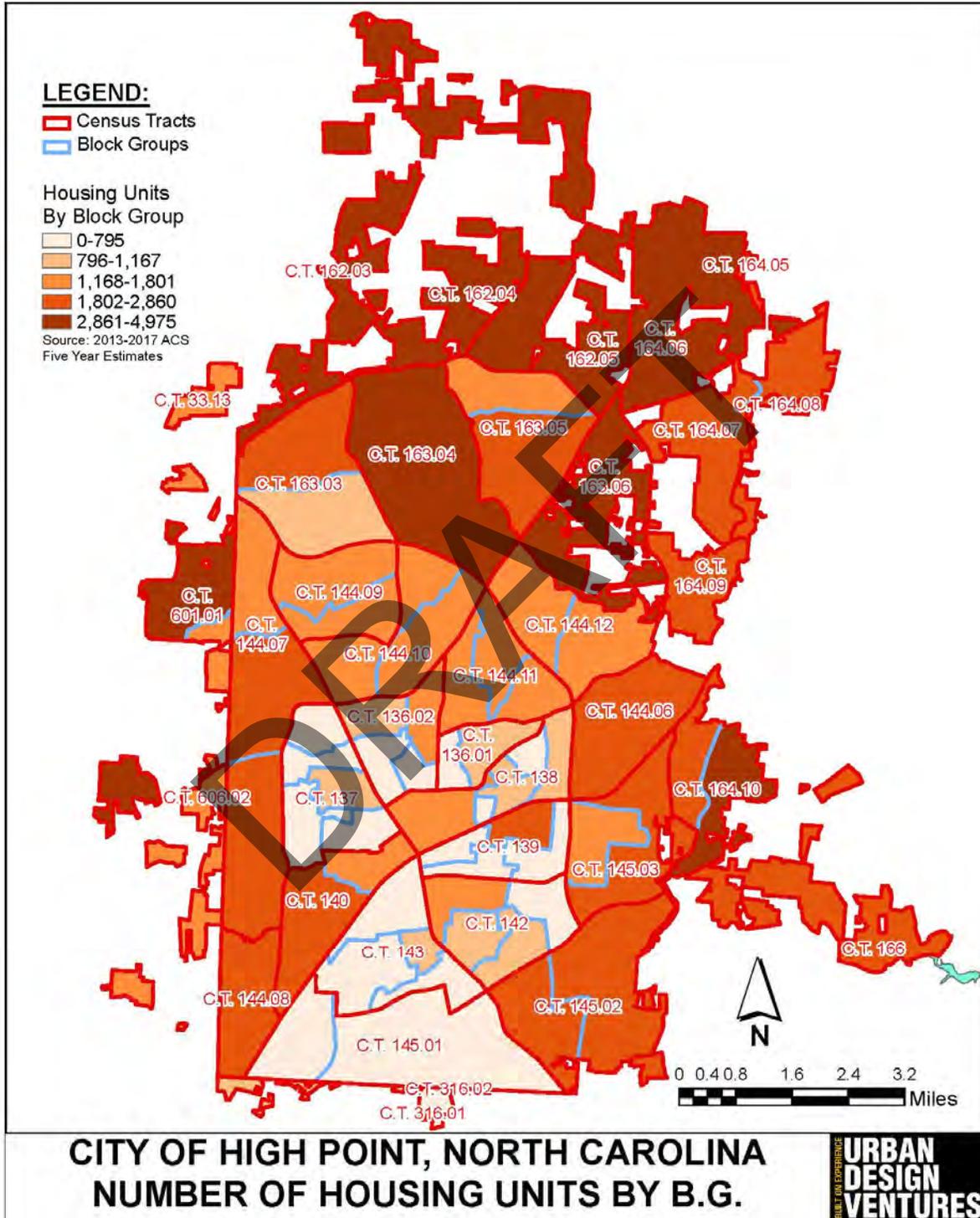
Figure II-B-1

Household Size by Tenure in the City of High Point

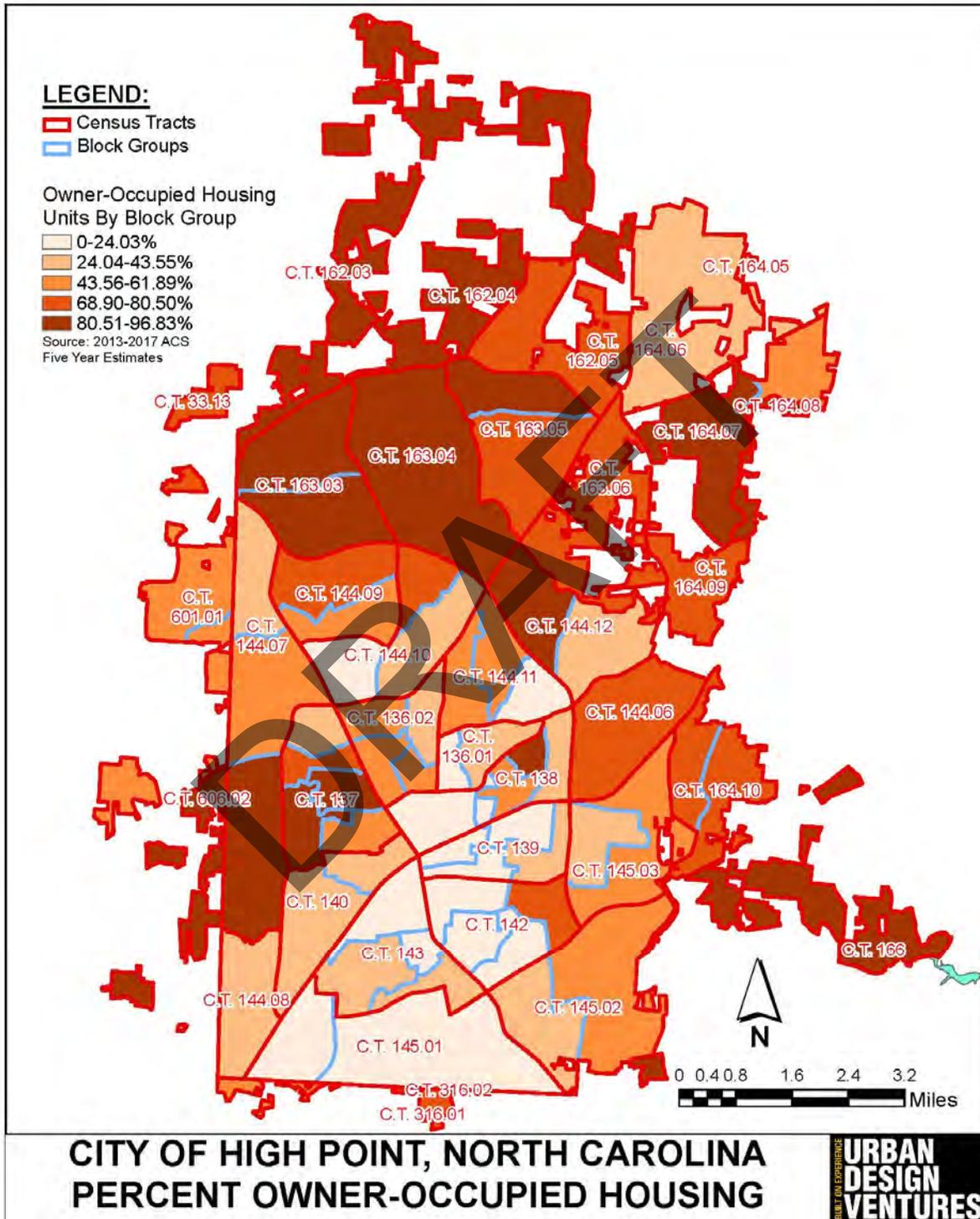


Source: 2012-2017 ACS and 2013-2017 ACS

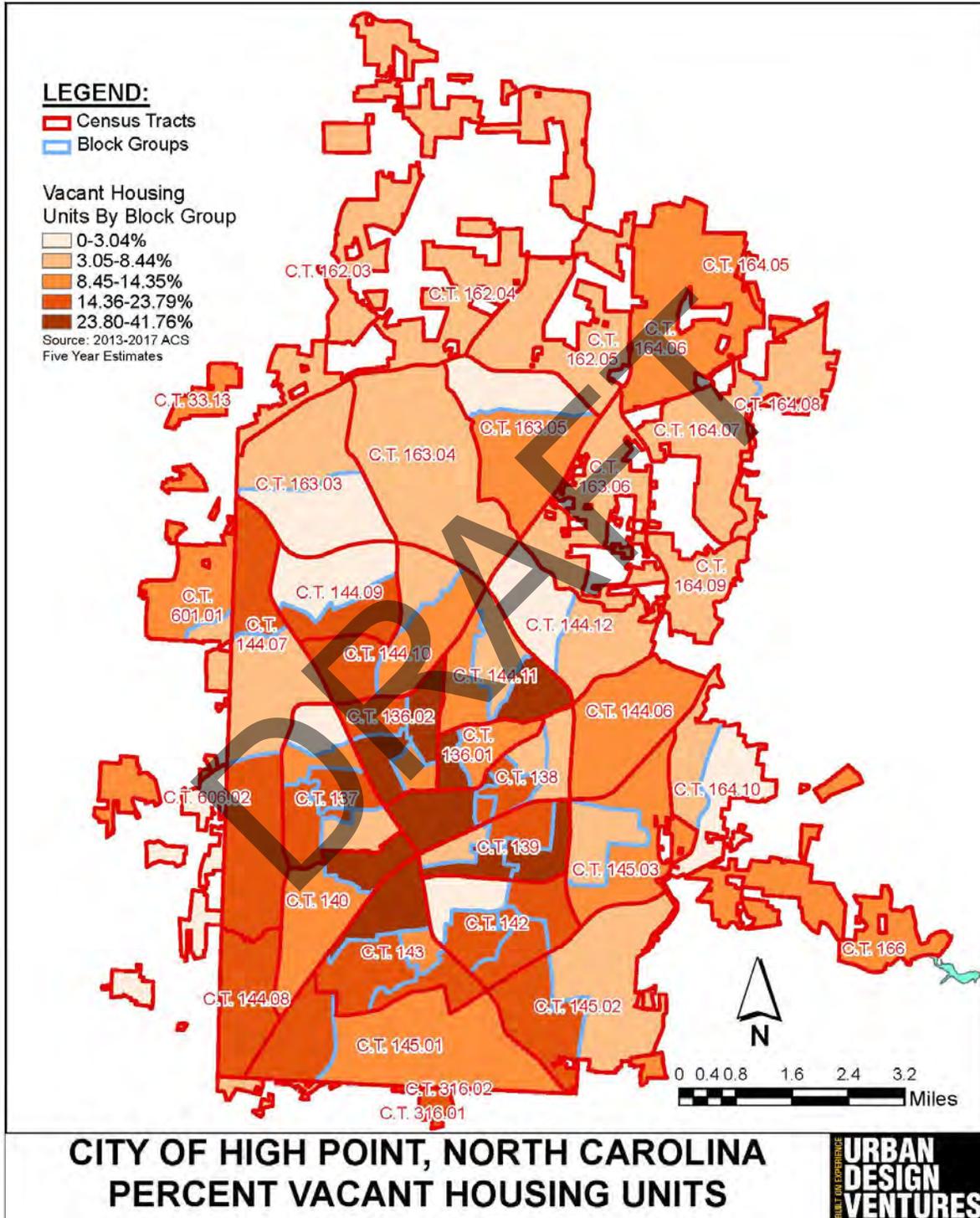
Map II-B-1



Map II-B-2



Map II-B-4



Household Tenure by Race and Ethnicity

The tables below compare homeowners and renters by race and ethnicity in High Point.

Table II-B-1: Household Type by Race and Ethnicity in the City of High Point

Cohort	2008-2012 ACS		2013-2017 ACS	
	#	%	#	%
Householder who is White alone	24,151	60.3%	22,682	55.4%
Householder who is Black or African American alone	12,699	31.7%	14,021	34.2%
Householder who is American Indian and Alaska Native alone	211	0.5%	164	0.4%
Householder who is Asian alone	1,676	4.2%	2,460	6%
Householder who is Native Hawaiian and Other Pacific Islander alone	0	0%	17	0%
Householder who is some other race alone	898	2.2%	915	2.2%
Householder who is two or more races	403	1%	686	1.7%
Householder who is Hispanic or Latino	2,324	5.8%	2,628	6.4%
Householder who is not Hispanic or Latino	22,860	57.1%	21,152	51.7%

Table II-B-2: Household Tenure by Race and Ethnicity in the City of High Point

Cohort	2008-2012 ACS				2013-2017 ACS			
	Owner	%	Renter	%	Owner	%	Renter	%
Householder who is White alone	16,886	42.2%	7,265	18.1%	14,947	36.5%	7,735	18.9%
Householder who is Black or African American alone	5,033	12.6%	5,285	12.9%	7,666	19.1%	8,736	21.3%
Householder who is American Indian and Alaska Native alone	126	0.3%	85	0.2%	34	0.1%	130	0.3%
Householder who is Asian alone	1,139	2.8%	537	1.3%	1,525	3.7%	935	2.3%

Householder who is Native Hawaiian and Other Pacific Islander alone	0	0.0%	9	0.0%	0	0.0%	8	0.0%
Householder who is some other race alone	301	0.8%	597	1.5%	310	0.8%	605	1.5%
Householder who is two or more races	187	0.5%	216	0.5%	187	0.5%	499	1.2%
Householder who is Hispanic or Latino	844	2.1%	1,480	3.7%	999	2.4%	1,629	4.0%
Householder who is not Hispanic or Latino	16,421	41.0%	6,439	16.1%	14,280	34.9%	6,872	16.8%

Source: 2008-2012 ACS and 2013-2017 ACS

Homeownership rates continue to decline in the City. Homeowners represented 59.1% (23,672 households) of all households in 2012 and 54.5% (22,297 households) of all households in 2017. In comparison, the number of rental units increased in the City. Renters represented 40.9% (16,366 households) of all households in 2012 and 45.5% (18,648 households) of all households in 2017.

Shifts in household tenure are particularly notable for Black/African American and Asian households in the City of High Point. These groups experienced the largest increases in rental populations from 2012 to 2017.

Families

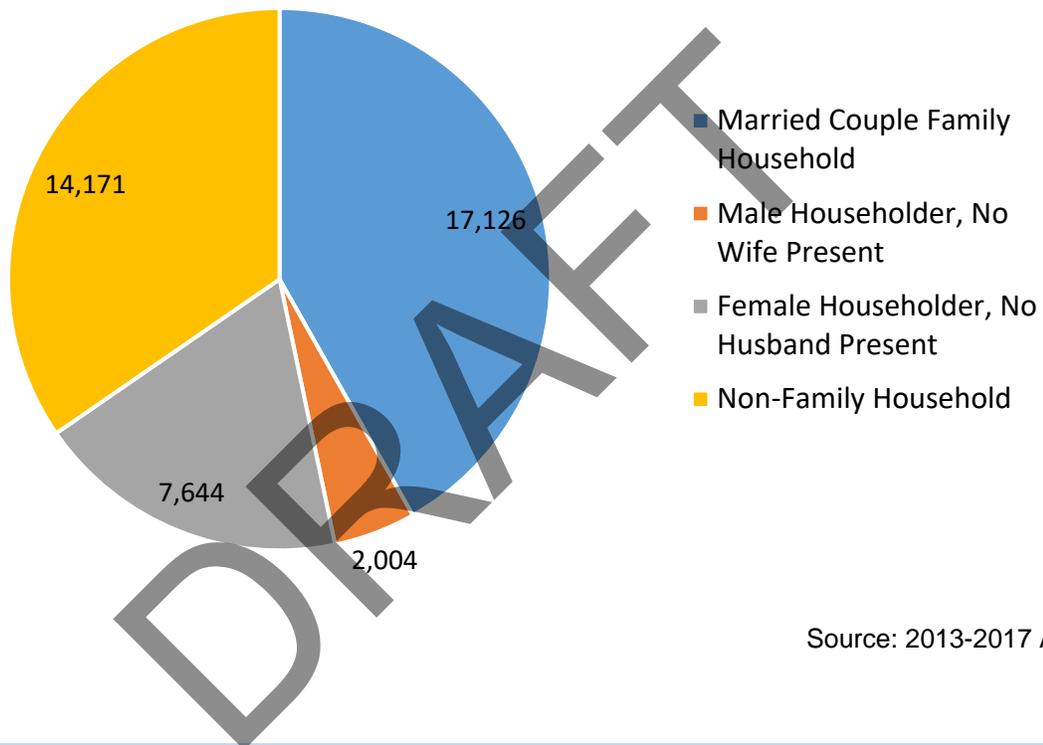
In 2012, there were a total of 40,038 households in High Point. Non-family households comprised 33.4% (13,932 households) of all households. In 2017, there were a total of 40,945 households, of which 14,171 (34.6% households) comprised non-family households. The total number of households in High Point increased by 907 units from 2012 to 2017, whereas the total number of non-family households increased by 239 units (1.7 percentage point increase). A non-family household is defined as a householder living alone or with others not related by family.

In 2017, non-family households comprised 34.6 percent of all households, married-couple family households comprised 41.8 percent of all households, female householders with no husband present comprised 18.7 percent of all

households, and male householders with no wife present comprised 4.9 percent of all households in the City. The chart below illustrates the breakdown of households by type in High Point as of 2017 using data from the 2013-2017 ACS.

Figure II-B-2

Family Type by Household in the City of High Point



Source: 2013-2017 ACS

C. Income and Poverty

Household Income

The median household income in High Point increased by only 0.6 percent (\$275 increase) from \$44,367 in 2012 to \$44,642 in 2017.

The table below compares the distribution of household income according to the 2008-2012 American Community Survey and the 2013-2017 American Community Survey.

Table II-C-1: Household Income in High Point

Items	2008-2012 ACS		2013-2017 ACS	
	Number of Households	Percentage	Number of Households	Percentage
Total Households	40,038	100%	40,945	100%
Less than \$10,000	3,454	8.6%	3,034	7.4%
\$10,000 to \$14,999	3,090	7.7%	2,802	6.8%
\$15,000 to \$24,999	4,836	12.1%	5,026	12.3%
\$25,000 to \$34,999	4,716	11.8%	5,493	13.4%
\$35,000 to \$49,999	6,411	16%	6,237	15.2%
\$50,000 to \$74,999	7,021	17.5%	6,782	16.6%
\$75,000 to \$99,999	4,268	10.7%	4,157	10.2%
\$100,000 to \$149,999	4,077	10.2%	4,619	11.3%
\$150,000 to \$199,999	1,405	3.5%	1,533	3.7%
\$200,000 or more	760	1.9%	1,262	3.1%
Median Household Income	\$44,367	(X)	\$44,642	(X)
Mean Household Income	\$57,547	(X)	\$64,445	(X)

Source: 2008-2012 and 2013-2017 ACS

The U.S. Department of Housing and Urban Development (HUD) establishes income limits that determine eligibility for assisted housing programs including Public Housing, Section 8 Project-Based, Section 8 Housing Choice Voucher, Section 202 housing for the elderly, and Section 811 housing for persons with disabilities programs. HUD develops income limits based on Median Family Income estimates and Fair Market Rent definitions for each metropolitan area, parts of some metropolitan areas, and each non-metropolitan county.

The Median Income for a family of four in the Metro Area was \$44,367 for 2012 which increased to \$44,642 in 2017.

The table below identifies the FY 2019 HUD Income Limits applicable to the Greensboro-High Point Metro Area.

**Table II-C-2: Greensboro-High Point, NC Metro Area
Section 8 Income Limits for FY 2019**

Income Category	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Extremely Low (30%) Income Limits	\$12,900	\$16,910	\$21,330	\$25,750	\$30,170	\$34,590	\$38,050	\$40,500
Very Low (50%) Income Limits	\$21,500	\$24,550	\$27,600	\$30,650	\$33,150	\$35,600	\$38,050	\$40,500
Low (80%) Income Limits	\$34,350	\$39,250	\$44,150	\$49,050	\$53,000	\$56,900	\$60,850	\$64,750

Source: HUD Section 8 Income Limits

The following table highlights the current low- and moderate-income population in the City of High Point. The block groups that have a population of more than 51% low- and moderate-income are highlighted in the following table. The City of High Point has an overall low- and moderate-income population of 46.77%.

**Table II-C-3: Low- and Moderate-Income
Population for the City of High Point Jurisdiction, NC**

CITY	COUNTY	TRACT	BLOCK GROUP	LOWMOD	LOWMODUNIV	LOWMODPCT
City of High Point	Forsyth County	003313	1	840	1480	56.76%
City of High Point	Guilford County	013601	2	120	165	72.73%
City of High Point	Guilford County	013601	1	780	955	81.68%
City of High Point	Guilford County	013602	1	660	1090	60.55%
City of High Point	Guilford County	013602	3	570	1035	55.07%
City of High Point	Guilford County	013602	2	380	695	54.68%
City of High Point	Guilford County	013602	4	530	925	57.30%
City of High Point	Guilford County	013700	3	305	810	37.65%

Background Data

City of High Point	Guilford County	013700	5	320	620	51.61%
City of High Point	Guilford County	013700	2	260	590	44.07%
City of High Point	Guilford County	013700	4	45	725	6.21%
City of High Point	Guilford County	013700	1	330	1075	30.70%
City of High Point	Guilford County	013800	2	845	1005	84.08%
City of High Point	Guilford County	013800	5	865	1515	57.10%
City of High Point	Guilford County	013800	4	435	445	97.75%
City of High Point	Guilford County	013800	3	300	445	67.42%
City of High Point	Guilford County	013800	1	555	790	70.25%
City of High Point	Guilford County	013900	4	1975	2215	89.16%
City of High Point	Guilford County	013900	2	465	635	73.23%
City of High Point	Guilford County	013900	3	705	815	86.50%
City of High Point	Guilford County	013900	1	665	750	88.67%
City of High Point	Guilford County	014000	2	1365	2010	67.91%
City of High Point	Guilford County	014000	1	995	1140	87.28%
City of High Point	Guilford County	014200	3	865	985	87.82%
City of High Point	Guilford County	014200	1	705	1005	70.15%
City of High Point	Guilford County	014200	4	860	915	93.99%
City of High Point	Guilford County	014200	2	730	840	86.90%
City of High Point	Guilford County	014300	4	380	670	56.72%
City of High Point	Guilford County	014300	1	545	580	93.97%
City of High Point	Guilford County	014300	2	625	720	86.81%
City of High Point	Guilford County	014300	3	805	960	83.85%

Background Data

City of High Point	Guilford County	014406	1	1070	2320	46.12%
City of High Point	Guilford County	014407	2	370	2375	15.58%
City of High Point	Guilford County	014407	3	1230	1720	71.51%
City of High Point	Guilford County	014407	1	930	2275	40.88%
City of High Point	Guilford County	014408	1	1515	2400	63.13%
City of High Point	Guilford County	014409	1	445	1455	30.58%
City of High Point	Guilford County	014409	2	955	1535	62.21%
City of High Point	Guilford County	014410	2	605	1070	56.54%
City of High Point	Guilford County	014410	3	1220	1580	77.22%
City of High Point	Guilford County	014410	1	550	1255	43.82%
City of High Point	Guilford County	014411	1	330	880	37.50%
City of High Point	Guilford County	014411	2	1300	2210	58.82%
City of High Point	Guilford County	014411	3	1240	1575	78.73%
City of High Point	Guilford County	014412	1	380	1095	34.70%
City of High Point	Guilford County	014412	2	535	1235	43.32%
City of High Point	Guilford County	014501	2	515	710	72.54%
City of High Point	Guilford County	014501	1	535	660	81.06%
City of High Point	Guilford County	014502	1	1565	2400	65.21%
City of High Point	Guilford County	014502	2	1800	2390	75.31%
City of High Point	Guilford County	014503	1	1840	2440	75.41%
City of High Point	Guilford County	014503	2	1090	1255	86.85%
City of High Point	Guilford County	016203	1	1075	3930	27.35%
City of High Point	Guilford County	016204	1	315	3345	9.42%

Background Data

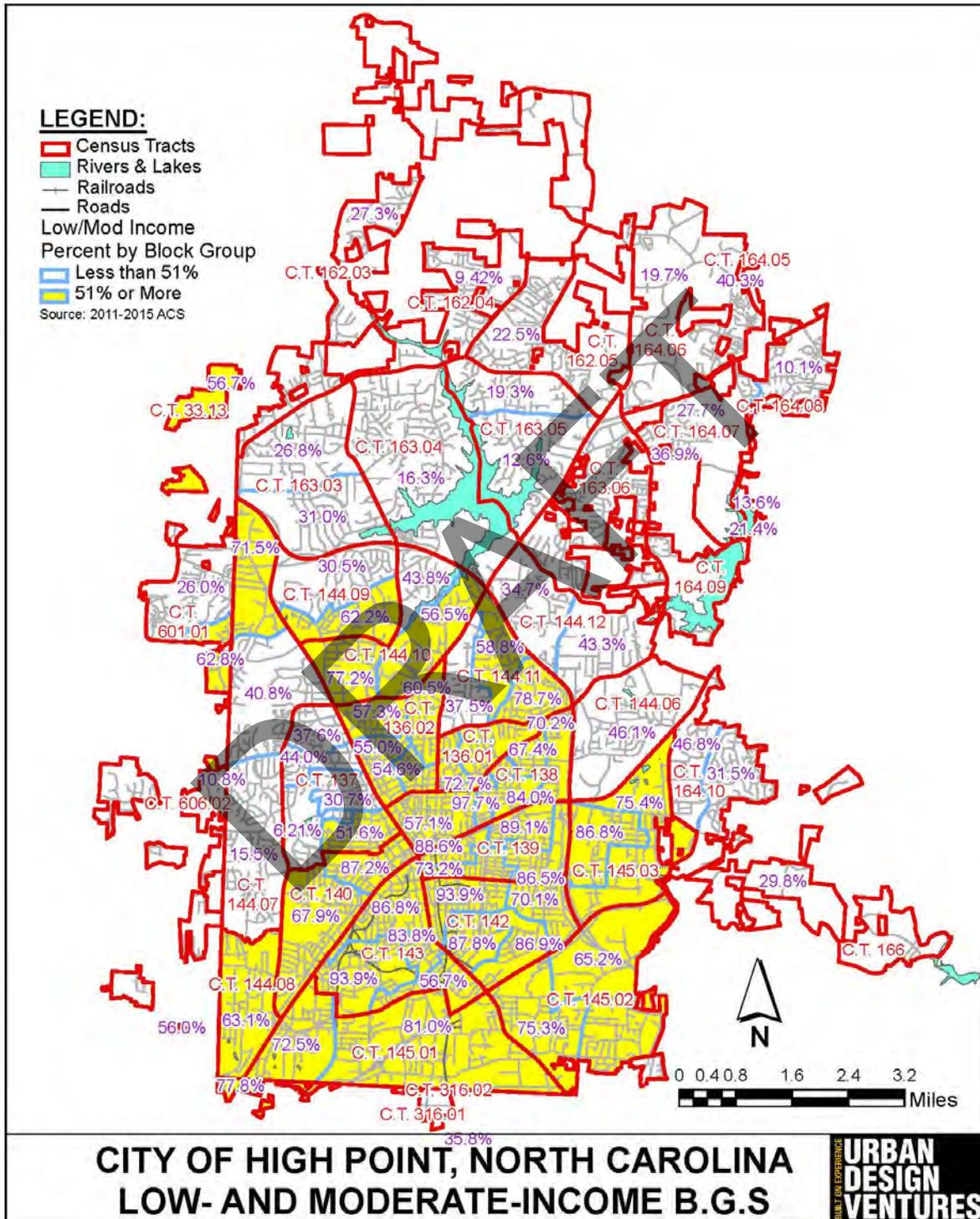
City of High Point	Guilford County	016205	1	890	3945	22.56%
City of High Point	Guilford County	016303	1	575	2140	26.87%
City of High Point	Guilford County	016303	2	405	1305	31.03%
City of High Point	Guilford County	016304	1	605	3710	16.31%
City of High Point	Guilford County	016305	2	230	1820	12.64%
City of High Point	Guilford County	016305	1	295	1525	19.34%
City of High Point	Guilford County	016306	1	1845	4995	36.94%
City of High Point	Guilford County	016405	1	720	1785	40.34%
City of High Point	Guilford County	016406	1	710	3595	19.75%
City of High Point	Guilford County	016407	2	240	2375	10.11%
City of High Point	Guilford County	016407	1	700	2520	27.78%
City of High Point	Guilford County	016408	1	260	1900	13.68%
City of High Point	Guilford County	016409	1	580	2710	21.40%
City of High Point	Guilford County	016410	1	1025	2190	46.80%
City of High Point	Guilford County	016410	2	1285	4070	31.57%
City of High Point	Guilford County	016600	1	770	2580	29.84%
City of High Point	Randolph County	031601	1	330	920	35.87%
City of High Point	Randolph County	031601	2	1020	1310	77.86%
City of High Point	Randolph County	031602	1	680	1290	52.71%
City of High Point	Davidson County	060101	1	1220	4680	26.07%
City of High Point	Davidson County	060101	2	745	1185	62.87%
City of High Point	Davidson County	060602	2	790	1410	56.03%
City of High Point	Davidson County	060602	1	140	1285	10.89%

Source: HUD Exchange

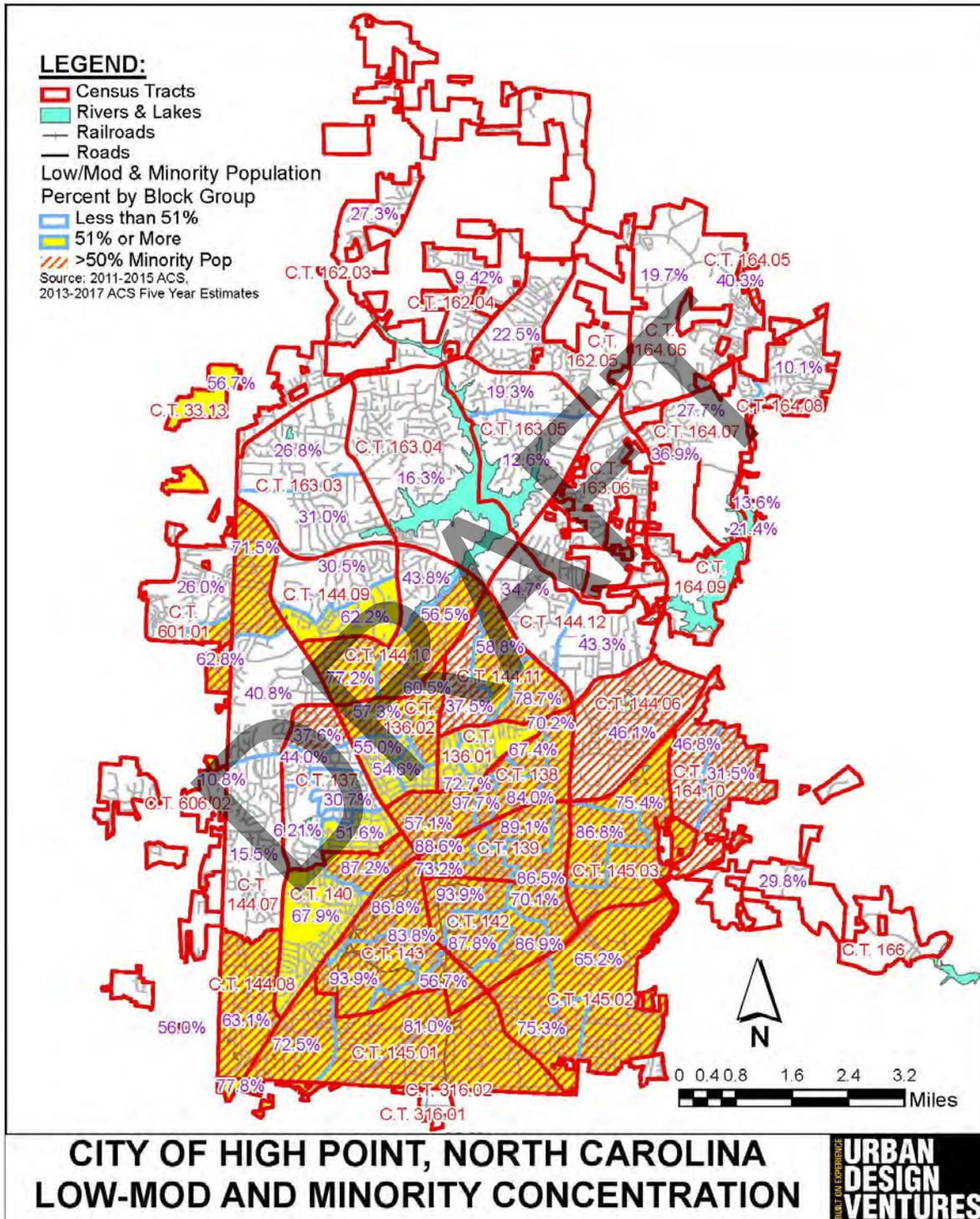
The following map illustrates areas of the City of High Point with concentrations of low- and moderate-income residents. These Census Block Groups are above 51% low- and moderate-income. They are mostly concentrated in the Core City of High Point, as well as some of the area to the East and South of the Core City. Additionally, a map of low- and moderate-income block groups with an overlay of all majority-minority block groups shows also that every minority-majority block group in the region is greater than 51% low- and moderate-income.

DRAFT

Map II-C-1



Map II-C-2

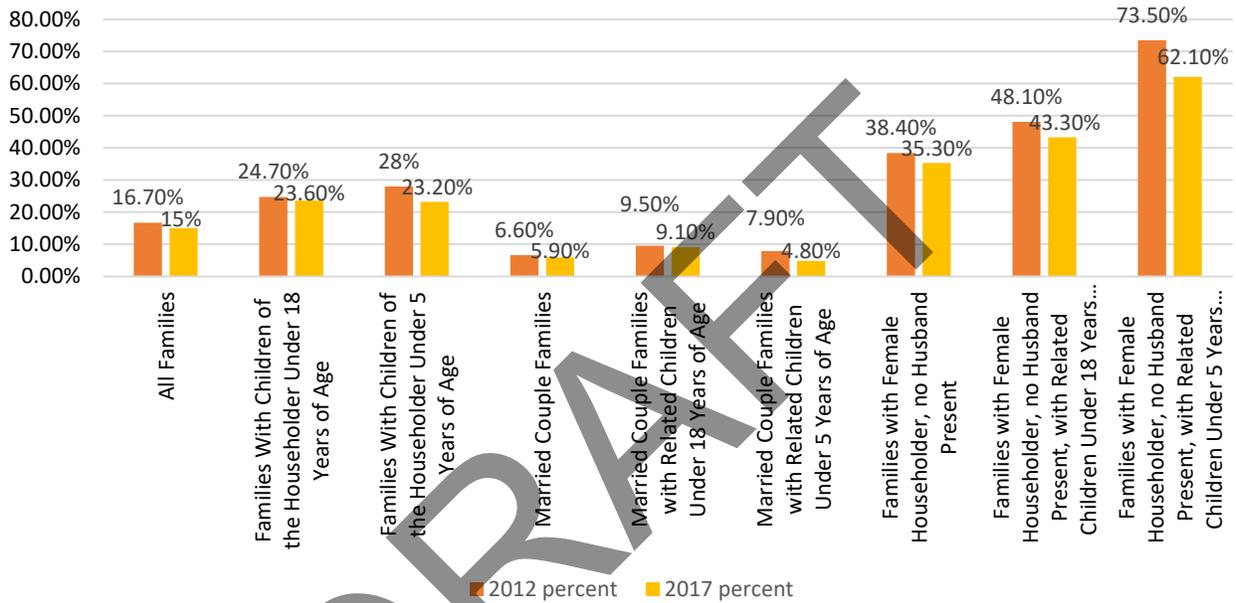


Family and Household Poverty

The City of High Point’s poverty statistics for families with children are highlighted in the chart below.

Figure II-C-1

**Percentage of Families in Household Poverty by Type
In the City of High Point, NC**



Source: 2008-2012 and 2013-2017 ACS

In High Point, the percentage of all families living in poverty experienced a decrease from 16.7% in 2012 to 15% in 2017. The percentage of female-headed householders with no husband present and with children under 18 years of age living in poverty was 48.1% in 2012 and decreased to 43.3% in 2017 in the City. The number of single female-headed households in poverty in the City is decreasing, though the proportion of these families in poverty is still very high.

D. Employment

Occupation

In 2012, according to 2008-2012 Estimates, the total number of eligible workers (population 16 years and over) in High Point was 80,299 persons. In 2012, 66.9 percent (53,758 persons) of eligible workers were in the labor force and 7.8 percent (6,231 persons) of eligible workers in the work force were unemployed.

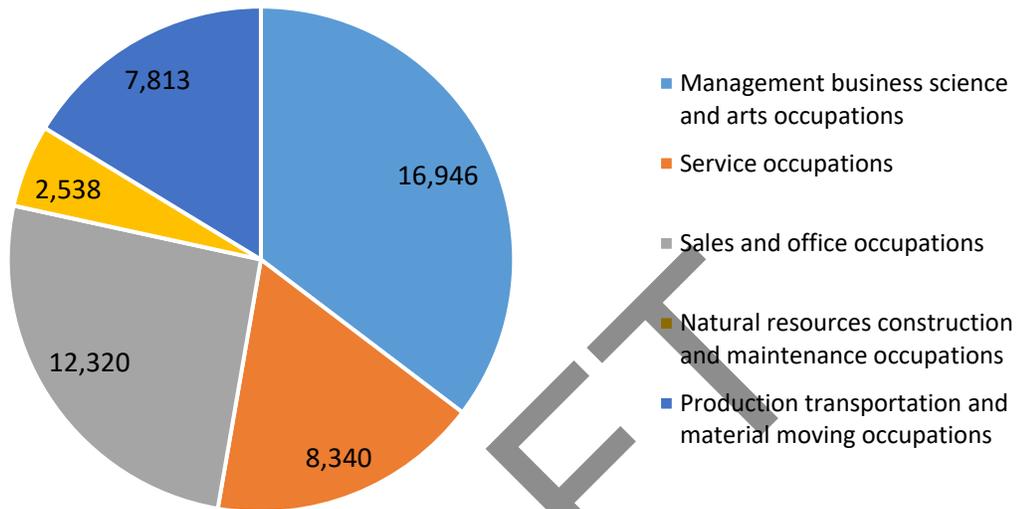
In 2017, according to 2017 ACS Estimates, the total number of eligible workers (population 16 years and over) in High Point was 86,001 persons. In 2017, 62.7 percent (53,944 persons) of eligible workers were in the labor force and 5.5 percent (4,745 persons) of eligible workers in the work force were unemployed. The number of people in the labor force in the City remained stagnant (though they took up a smaller portion of the population) while the unemployment rate went down. Many of people moving to High Point are not in the labor force, though the reason cannot be determined from this data.

Workers in 2017 had a mean travel time to work of 20.5 minutes.

Per the 2013-2017 American Community Survey, an estimated 30.5 percent (12,477 households) of households in High Point receive income from Social Security. The mean Social Security Income for 2017 was \$18,424.

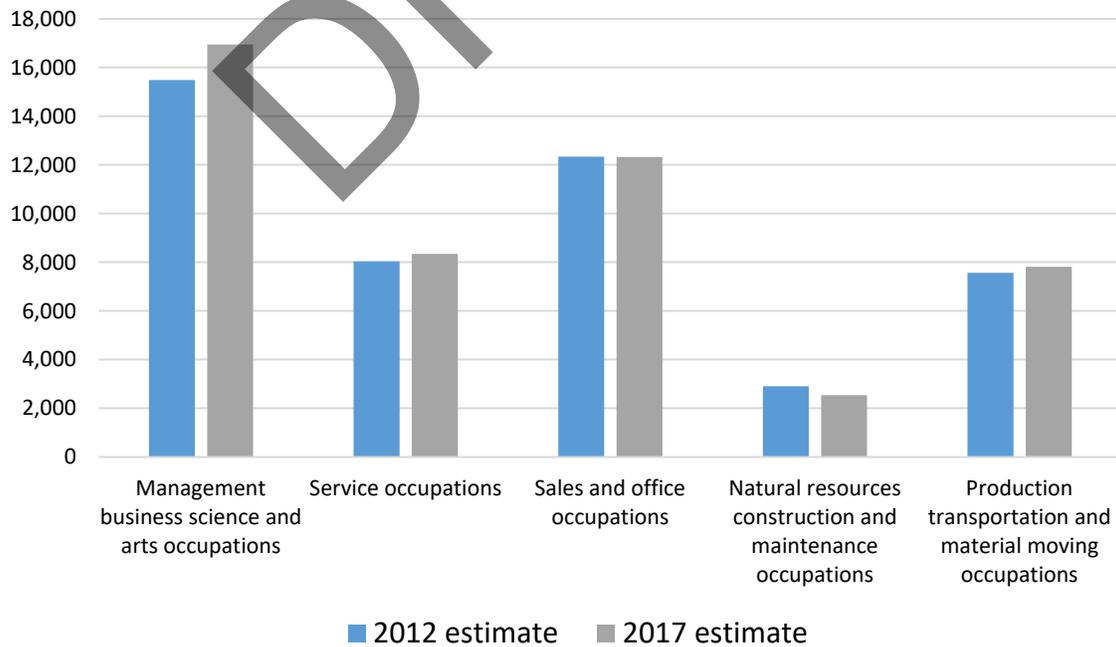
The following charts outline the distribution of High Point workers by occupation.

Figure II-D-1
Occupations in High Point



Source: 2013-2017 ACS

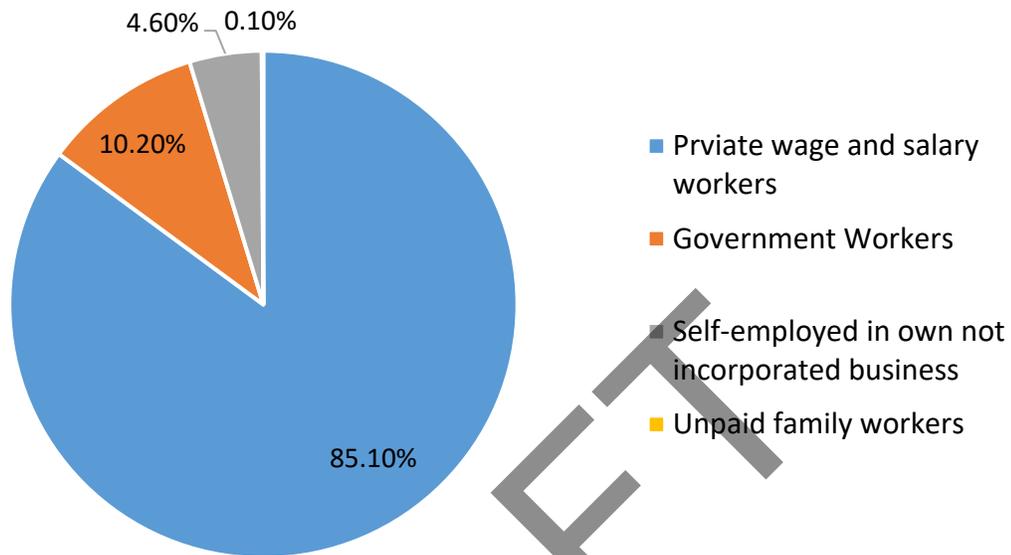
Figure II-D-2
Occupation Change in the City of High Point



Source: 2006-2010 ACS and 2013-2017 ACS

Figure II-D-3

Worker Class in the City of High Point in 2017

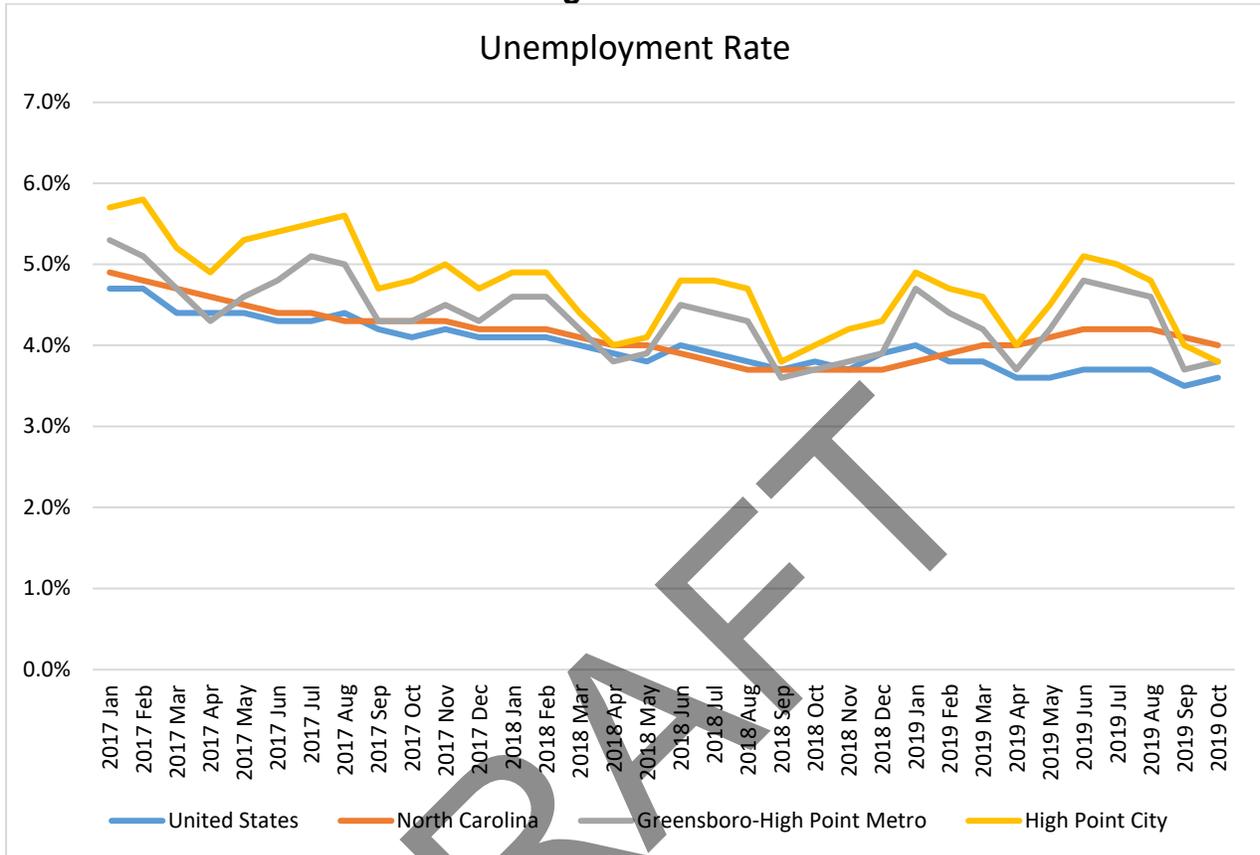


Source: 2006-2010 ACS and 2013-2017 ACS

Unemployment Rate

The unemployment rate for the City of High Point is shown below with the unemployment rate in the State of North Carolina and nationally. The unemployment rate in the City of High Point was 3.8% in October 2019 (the latest data available). In Guilford County, the unemployment rate was 3.8% during the same time period. The State of North Carolina had a 4.0% unemployment rate, which was above the Nation's at 3.6% in October 2019.

Figure II-D-4



Source: Bureau of Labor Statistics

The unemployment rates for the City of High Point and the Greensboro-High Point Metropolitan Statistical Area are not seasonally adjusted. From January 2017 to September 2019, the City unemployment rate was an average of 0.7 percentage points higher than the national and State unemployment rates, and an average of 0.3 percentage points higher than the unemployment rate of the Metropolitan Area.

The trends suggest that from January 2017 to September 2019 the unemployment rate in the City of High Point increased at a faster rate than the national average in 2019, which was a statewide trend for North Carolina.

E. Housing Profile

Slightly more than one-third of the City’s housing stock (35%) was built prior to 1970, which coincides with the City’s initial growth. Only 24% of its housing

stock was built after 2009. The oldest housing stock in the region is within the core of High Point; approximately 7% of the City’s housing stock was built prior to 1939. The following chart illustrates the year that housing structures were built in the City of High Point based on the 2013-2017 American Community Survey.

Housing Profile

The following table details the year that housing structures were built in the City of High Point as of 2017.

Table II-E-1: Year Structure Built in High Point

Housing Profile	2008-2012 ACS		2013-2017 ACS	
	#	%	#	%
Total	45,669	100%	46,550	100%
Built 2014 or later	-	-	329	0.7%
Built 2010 to 2013	165	0.4%	1,019	2.2%
Built 2000 to 2009	9,854	21.6%	9,833	21.1%
Built 1990 to 1999	8,416	18.4%	8,266	17.8%
Built 1980 to 1989	5,303	11.6%	4,978	10.7%
Built 1970 to 1979	6,698	14.7%	5,869	12.6%
Built 1960 to 1969	5,034	11.0%	5,472	11.8%
Built 1950 to 1959	4,546	10.0%	4,818	10.4%
Built 1940 to 1949	2,367	5.2%	2,709	5.8%
Built 1939 or earlier	3,286	7.2%	3,257	7.0%

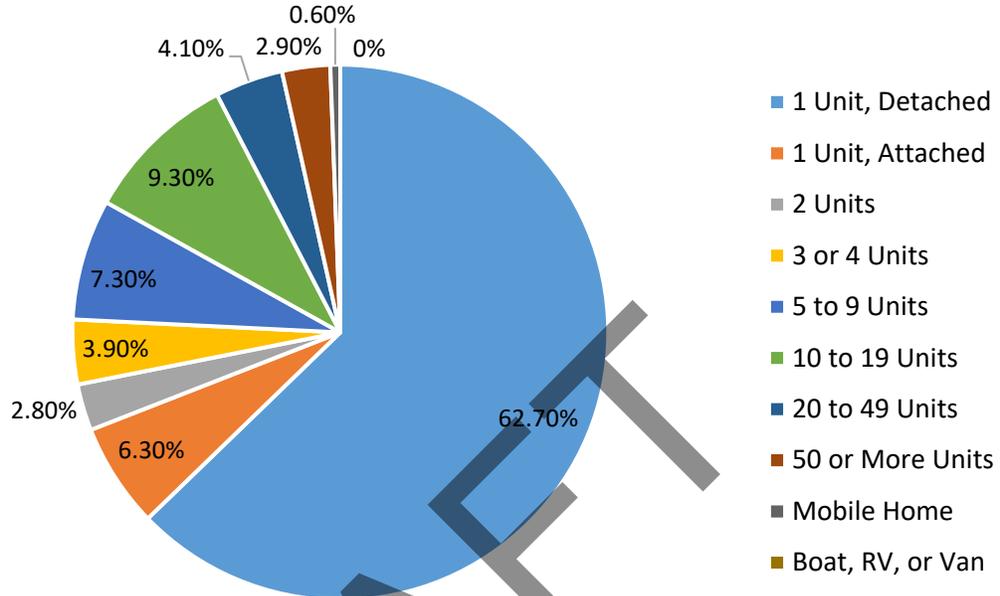
Source: 2008-2012 ACS and 2013-2017 ACS

The majority of housing units in High Point are 1-unit detached comprising 62.7% percent (46,550 units) of all housing units.

The following graph illustrates the composition of the housing stock in High Point as of 2017.

Figure II-E-1

Housing by Number of Units in the City of High Point



Source: 2013-2017 ACS

The 2013-2017 American Community Survey estimates that the median value of owner-occupied housing in High Point has decreased since 2012 from \$145,900 to \$144,900. The latest available data from real estate listings presented a similar value of home values in the City; according to Zillow, the median list price of a home in High Point was \$152,000 as of December, 2019.

The following table outlines the number of new housing units for which building permits were filed annually for the City of High Point. The City has seen a decrease in the total number of new units constructed since 2014, where the number of new permits peaked, with a large decrease between 2015 and 2016, although there was a slight increase in the number of permits granted from 2018 to 2019.

The table below contains data on the number of permits for residential construction issued by the City of High Point.

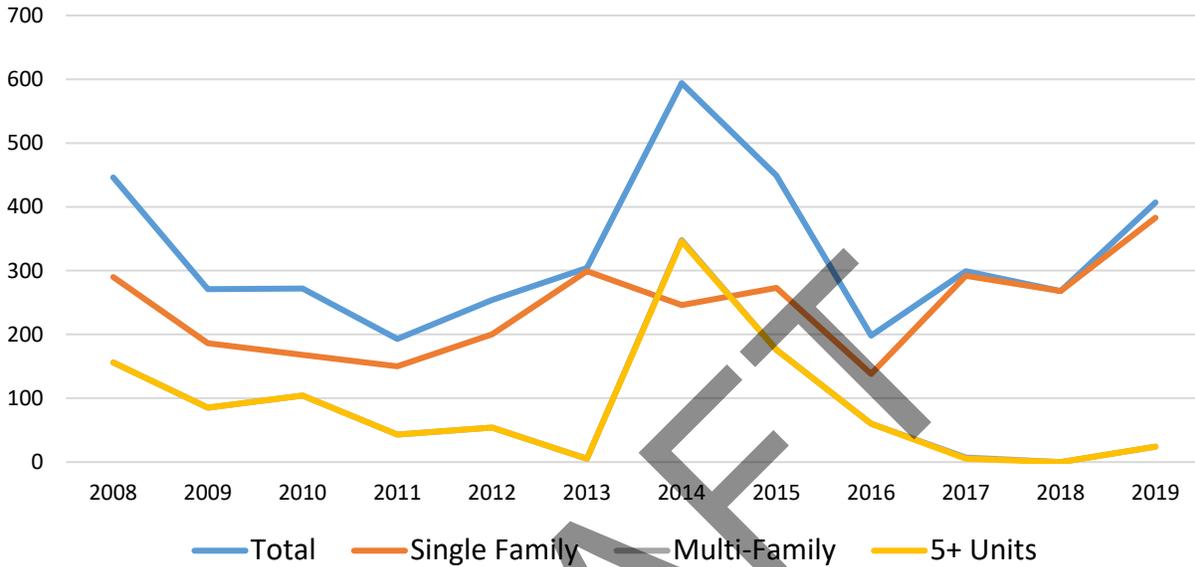
Table II-E-2: Units Authorized by Building Permits – High Point

YEAR	Total	Single Family	Multi-Family	5+ Units
2019	407	383	24	24
2018	268	268	0	0
2017	299	292	7	5
2016	198	138	60	60
2015	449	273	176	176
2014	594	246	348	346
2013	304	299	5	5
2012	254	200	54	54
2011	193	150	43	43
2010	272	168	104	104
2009	271	186	85	85
2008	446	290	156	156

Source: SOCDs Building Permits Database, HUD

Figure II-E-2

**Building Permits by Number of Units Issued in
The City of High Point**



Source: SOCDs Building Permits Database, HUD

The area has seen an overall decrease in the total number of new units constructed since 2014 and 2015. Averaged across the 12-year period, a 73.1 percent of new units each year were for single family units.

The year with the highest number of units authorized was 2014 and the year with the highest number of single-family units was 2019. The average number of units approved decreased from 2008 (following the housing crash) to 2011, and then began increasing again in the form of an increase in single-family housing permits from 2011 to 2013. In 2014, the number of single-family permits began falling, while the number of multi-family permits increased. However, following 2014, which was the peak of construction for multi-family units, the number of multi-family units permitted dropped substantially and has not increased until 2019. Single-family housing permits granted fell from 2013 to 2016, but then have been steadily increasing again since 2017.

F. Financing

Owner Costs

The median monthly housing cost for owner-occupied households was \$1,306 in 2012 and \$1,249 in 2017. The median monthly housing cost for owner-occupied households decreased by 4.3 percent, or \$57, from 2012 to 2017. Dollar amounts have been adjusted for inflation. This was likely due to the nature of new migrants to High Point, who are overwhelmingly renters. Because much of the demand has shifted to rentals, homeowner housing costs are largely unchanging.

The following table illustrates selected monthly owner-occupied costs in 2012 and 2017.

Table II-F-1: Monthly Owner Costs in High Point

Monthly Owner Cost	2008-2012 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Owner-Occupied Housing Units	23,672	100%	22,297	100%
Less than \$300	237	1.0%	188	0.8%
\$300 to \$499	738	3.1%	736	3.3%
\$500 to \$799	1,466	6.2%	1,318	5.9%
\$800 to \$999	1,471	6.2%	1,714	7.7%
\$1,000 to \$1,499	1,124	4.7%	1,222	5.5%
\$1,500 to \$1,999	1,063	4.5%	1,073	4.8%
\$2,000 or more	1,455	6.1%	1,418	6.4%
No Cash Rent	1,228	5.2%	1,315	5.9%
Median (dollars)	1,568	6.6%	1,642	7.4%

Source: 2008-2012 and 2013-2017 American Community Survey

The following table illustrates housing costs for owner-households in 2010 and 2017 according to the 2008-2012 ACS and the 2013-2017 ACS.

**Table II-F-2: Monthly Owner Costs
as a Percentage of Household Income in High Point**

Owner Costs as a % of Income	2008-2012 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Owner-Occupied Housing Units	23,672	59.1%	22,297	54.5%
Less than \$20,000	2,462	10.4%	1,769	7.9%
Less than 20 percent	189	0.8%	94	0.4%
20 to 29 percent	379	1.6%	203	0.9%
30 percent or more	1,894	8.0%	1,472	6.6%
\$20,000 to \$34,999	3,456	14.6%	3,204	14.4%
Less than 20 percent	805	3.4%	846	3.8%
20 to 29 percent	663	2.8%	684	3.1%
30 percent or more	1,965	8.3%	1,674	7.5%
\$35,000 to \$49,999	3,811	16.1%	3,017	13.5%
Less than 20 percent	923	3.9%	1,063	4.8%
20 to 29 percent	1,089	4.6%	958	4.3%
30 percent or more	1,823	7.7%	996	4.5%
\$50,000 to \$74,999	4,663	19.7%	4,482	20.1%
Less than 20 percent	1,775	7.5%	1,995	8.9%
20 to 29 percent	1,823	7.7%	1,649	7.4%
30 percent or more	1,065	4.5%	838	3.8%
\$75,000 or more	9,114	38.5%	9,573	42.9%
Less than 20 percent	6,060	25.6%	7,634	34.2%
20 to 29 percent	2,391	10.1%	1,606	7.2%
30 percent or more	663	2.8%	333	1.5%
Zero or negative income	166	0.7%	252	1.1%
No cash rent	NA	NA	NA	NA

Source: 2008-2012 and 2013-2017 American Community Survey

HUD defines a housing cost burden as a household that pays over 30 percent or more of its monthly income on housing costs. In 2012, 31.3 percent (7,410 units) of owner-occupied units were cost burdened and 23.9 percent (5,313 units) of owner-occupied households in 2017 were cost burdened. This is likely due to a combination of factors. Of those identified,

probable causes include: an increase in demand for rental housing among those migrating to High Point; fewer homeowners in the lowest-income categories that are now forced to rent and increasing demand for rental housing; and a decrease in the interest rate, reducing homeowner costs but not renter costs.

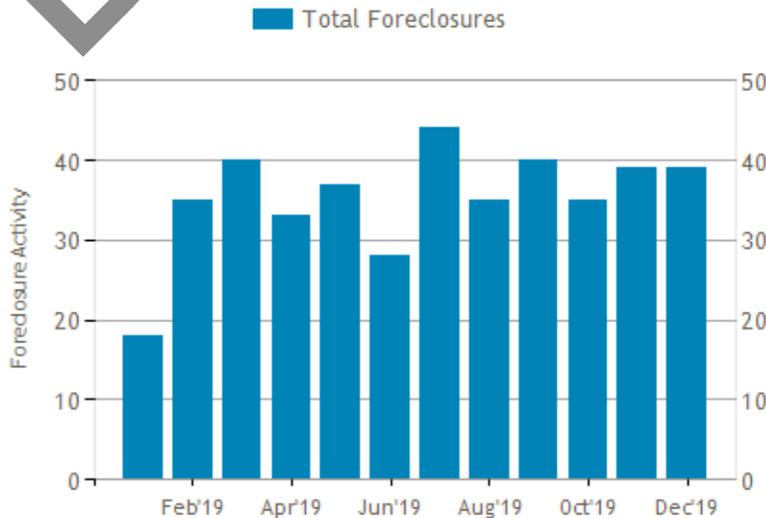
According to www.zillow.com, the median list price for a house in the City of High Point was \$152,000 in December of 2019, and the median sale price was \$145,000. The average price per square foot in the City of High Point is \$94 in the same time period.

Foreclosures

According to www.realtytrac.com, the City of High Point had 181 foreclosures at a rate of 1 in every 1,334 in December, 2019, while Guilford County had a foreclosure rate of 1 in 1,522. High Point’s foreclosure rate is third highest in the County, after Whitsett and Gibsonville.

The foreclosure rate in the City still remains higher than that of the State of North Carolina, which has a foreclosure rate of 1 in every 2,324. The North Carolina Housing Finance Agency had provided Hardest Hit funds to Guilford County for foreclosure mitigation due to the number of foreclosures in the County. The funds were administered by Housing Consultants Group, and all funding had been used for foreclosure mitigation by 2019.

**Figure II-F-1
Number of Foreclosures in the City of High Point, NC**



The number of foreclosures for the City of High Point was at its highest in July of 2019 with 44 foreclosures. Foreclosure prevention programs were provided through the NC Foreclosure Prevention Fund, which included two Hardest Hit Programs, Mortgage Payment Program (MPP) and Second Mortgage Refinance Program (SMRP), along with the State’s existing Home Protection Program (HPP) and Principal Reduction Recast/Lien Extinguishment (PRLE) program. Applicants for these funds are eligible if they are in danger of losing their homes, with other qualifications dependent on the program. More information of foreclosure mitigation programs can be obtained through contact with the Housing Consultants Group.

- Housing Consultants Group**
 804 Lindsay Street
 High Point, NC 27260
 Phone: 336-553-0946
www.housingconsultantsgroup.org

Renter Costs

The median monthly housing cost for renter-occupied households was \$757 in 2012; and \$821 in 2017. The median monthly housing cost for renter-occupied households increased by 8.5 percent, or \$64, from 2012 to 2017. Dollar amounts are adjusted for inflation. This increase has been caused by an increase in demand for rental housing from the in-migration of new residents.

The following table illustrates mortgage status and selected monthly renter costs in 2012 and 2017.

Table II-F-3: Selected Monthly Renter Costs in High Point

Monthly Renter Cost	2008-2012 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Renter-Occupied Housing Units	16,366	100%	18,648	100%
Less than \$300	1,064	6.4%	934	5.1%
\$300 to \$499	1,403	8.6%	1,143	6.1%
\$500 to \$799	6,671	40.8%	6,226	33.4%

\$800 to \$999	3,554	21.7%	4,987	26.7%
\$1,000 to \$1,499	2,284	13.9%	3,738	20.1%
\$1,500 to \$1,999	359	2.2%	638	3.4%
\$2,000 or more	343	2.1%	258	1.4%
No Cash Rent	688	4.2%	724	3.9%
Median (dollars)	757	(X)	821	(X)

Source: 2008-2012 and 2013-2017 American Community Survey

The following table illustrates housing costs for renter-occupied households in 2012 and 2017 according to the 2008-2012 ACS and the 2013-2017 ACS.

Table II-F-4: Selected Monthly Renter Costs as a Percentage of Household Income in High Point

Renter Costs as a % of Income	2008-2012 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Renter-Occupied Housing Units	16,366	40.9%	18,648	45.5%
Less than \$20,000	5,456	13.6%	5,636	13.8%
Less than 20 percent	103	0.3%	221	0.5%
20 to 29 percent	579	1.4%	327	0.8%
30 percent or more	4,774	11.9%	5,088	12.4%
\$20,000 to \$34,999	3,569	8.9%	4,512	11%
Less than 20 percent	239	0.6%	148	0.4%
20 to 29 percent	935	2.3%	813	2%
30 percent or more	2,395	6%	3,551	8.7%
\$35,000 to \$49,999	2,538	6.3%	3,174	7.8%
Less than 20 percent	567	1.4%	565	1.4%
20 to 29 percent	1,582	4%	1,678	4.1%
30 percent or more	389	1%	931	2.3%
\$50,000 to \$74,999	2,330	5.8%	2,286	5.6%
Less than 20 percent	1,574	3.9%	1,294	3.2%
20 to 29 percent	571	1.4%	874	2.1%
30 percent or more	185	0.5%	118	0.3%
\$75,000 or more	1,352	3.4%	1,909	4.7%
Less than 20 percent	1,181	2.9%	1,547	3.8%
20 to 29 percent	109	0.3%	289	0.7%
30 percent or more	62	0.2%	73	0.2%
Zero or negative income	433	1.1%	407	1%

No cash rent	688	1.7%	724	1.8%
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Source: 2008-2012 and 2013-2017 American Community Survey

Table II-F-5: Gross Rent as a Percentage of Household Income in High Point

Rental Cost as a % of Income	2008-2012 ACS		2013-2017 ACS	
	Number of Housing Units	Percentage	Number of Housing Units	Percentage
Rental Units paying rent	15,245	100%	17,517	100%
Less than 15 percent	1,688	11.1%	1,715	9.8%
15 to 19 percent	1,976	13%	2,060	11.8%
20 to 24 percent	1,944	12.8%	2,129	12.2%
25 to 29 percent	1,832	12%	1,852	10.6%
30 to 34 percent	1,098	7.2%	1,838	10.5%
35 percent or more	6,707	44%	7,923	45.2%
Not computed	1,121	7.4%	1,131	6.5%

Source: 2008-2012 and 2013-2017 American Community Survey

HUD defines a housing cost burden as a household that pays over 30 percent or more of its monthly income on housing costs. In 2012, 51.2 percent (7,805 units) of renter-occupied units were cost burdened and 55.7 percent (9,761 units) of renter-occupied households in 2017 were cost burdened. Note that the Gross Rent that has not been computed is an aggregation of “Zero or negative income” and “No cash rent” counts.

In 2012, 31.3 percent (7,410 units) of owner-occupied households were cost burdened whereas 51.4 percent (7,828 units) of renter-occupied households were cost burdened. In 2017, 23.9 percent (5,313 units) of owner-occupied households were cost burdened whereas 51.7 percent (9,054 units) of renter-occupied households were cost burdened. The construction of rental units has attempted to keep pace with the increased demand in the rental market, but demand has been increasing too quickly and driving prices up.

The 2019 and 2020 HUD Fair Market Rents and HOME Rent Limits for the Metro Area are shown in the table below.

Table II-F-6: Fair Market Rents (FMR) and HOME Rent Limits for the Metro Area

Rent	FY 2019	FY 2020	Change in FMR 2018 to 2019
Efficiency	\$686	\$612	-\$74
One-Bedroom	\$728	\$661	-\$67
Two-Bedroom	\$838	\$769	-\$69
Three-Bedroom	\$1,114	\$1,028	-\$86
Four-Bedroom	\$1,288	\$1,201	-\$87

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

Fair Market Rents (FMRs) are primarily used to determine payment standard amounts for HUD assisted housing. The High HOME Rent Limit for an area is the lesser of the Section 8 Fair Market Rent (FMR) for the area or a rent equal to 30% of the annual income of a family whose income equals 65% of the area median income, as determined by HUD. The Low HOME Rent Limit for an area is 30% of the annual income of a family whose income equals 50% of the area median income, as determined by HUD, capped by the High HOME Rent Limit. HUD's Economic and Market Analysis Division calculates the HOME rents each year using the FMRs and the Section 8 Income Limits.

The area median rent is estimated to be \$821 according to the 2013-2017 ACS data, while the median rent in the City of High Point for a two-bedroom apartment is \$800 according to Zillow in December, 2019. The average rents posted commercially do not exceed the area median rent and fair market rents. The rental market in the City of High Point is competitive and assisted rental housing units do not disproportionately impact the market forces dictating rents in the area. Rents in this area are comparable to those in the County (\$795), but less expensive than rents in Greensboro (\$875), which is driving demand.

G. Household Types

Based on a comparison between the 2012 to 2017 population, the City of High Point had an 8% increase in its population. The population increase was 8,079 persons, and the housing demand increased by 2,329 households. The City of High Point is experiencing in-migration both from within and outside the United States. The housing market in the City of High Point has added housing in conjunction with the population increase. The median income of the area increased by 1% from \$43,322 to \$43,594 from 2012 to 2017. This increase in median income represents a change in nominal dollars and not a change in real dollars. In order to calculate the change in real dollars, the Consumer Price Index is used to calculate the inflation rate for a given period. Between 2012 and 2017, the cumulative inflation rate was approximately 17.96%, meaning that the \$43,322.00 median income in 2012 would be \$46,424.02 if it were expressed in terms of 2017 dollars. By taking into consideration the rate of inflation, the median income in High Point has not kept up with the rate of inflation.

Table II-G-1: Changes Between 2012 & 2017

Demographics	2012	2017	% Change
Population	100,903	108,928	+8.01%
Households	38,788	41,117	+5.66%
Household Median Income	\$43,322	\$43,594	+0.06%

Data Source: 2008-2012 and 2013-2017 American Community Surveys

Table II-G-2: Number of Households Table – City of High Point

	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	>100% AMI
Total Households *	5,153	5,125	7,065	3,490	17,989
Small Family Households *	2,150	1,835	2,810	1,465	9,379
Large Family Households *	425	605	625	420	1,185
Household contains at least one person 62-74 years of age	735	1,125	1,505	670	3,475

	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	>100% AMI
Household contains at least one person age 75 or older	459	610	1,070	495	1,590
Households with one or more children 6 years old or younger *	1,350	1,119	1,020	449	2,270

Data Source: 2012-2016 CHAS

Of all households, slightly less than half (46.4%) have a higher income than the HUD Area Median Income (AMI) for the Greensboro-High Point, NC, MSA. This includes both small and large family households, though there are few large family households under 100% AMI. The remaining 53.4% of total households make less than the AMI, with the largest remaining group (19.2% of total households) being those making between 50-80% of AMI. Households that make 30% of AMI have an annual income of \$18,390; as HUD defines affordable housing as paying no more than 30% of income on rent, this leaves low-income households with less than \$460 per month (without taking out taxes) to spend on housing. The largest housing problem in the City of High Point is housing affordability. According to the 2013-2017 ACS data, an estimated 55.7% of all renter households are cost overburdened by 30% or more, and an estimated 24.1% of all owner households are cost overburdened by 30% or more. Approximately 28.5% of owner occupied households with a mortgage are cost overburdened by 30% or more, compared to only 11.9% of owner occupied households without a mortgage.

**Table II-G-3: Housing Problems
(Households with one of the listed needs) – City of High Point**

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Substandard Housing - Lacking complete plumbing or kitchen facilities	80	115	20	55	375	25	0	4	0	150

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	145	0	20	10	170	30	4	20	0	75
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	105	295	240	65	825	20	30	15	50	155
Housing cost burden greater than 50% of income (and none of the above problems)	2,450	1,170	135	10	3,795	550	575	555	45	1,780
Housing cost burden greater than 30% of income (and none of the above problems)	450	1,610	1,660	230	4,050	70	430	1,050	570	3,045
Zero/negative Income (and none of the above problems)	445	0	0	0	445	235	0	0	0	235

Data Source: 2012-2016 CHAS

The following table illustrates the discrepancies between homeowners and renters regarding housing problems. While there are slightly more owner-occupied housing units than renter-occupied units (22,297 to 18,648, respectively), renters face a much higher rate of housing problems.

Table II-G-4: Housing Problems (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden) – City of High Point

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Having 1 or more of four housing problems	2,780	1,580	405	135	5,165	620	610	595	95	2,160
Having none of four housing problems	939	2,045	3,380	1,469	11,973	125	885	2,675	1,774	18,799
Household has negative income, but none of the other housing problems	445	0	0	0	445	235	0	0	0	235

Data Source: 2012-2016 CHAS

While more renters than owners (5,170 vs. 2,160) face severe housing problems than renters, renters have a much higher rate.

Table II-G-5: Cost Overburdened Greater Than 30% – City of High Point

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	230	920	710	1,985	35	105	415	1,250
Large Related	60	235	170	465	20	25	45	205
Elderly	80	185	165	520	25	225	210	610
Other	155	355	535	1,125	4	25	195	539
Total need by income	525	1,695	1,580	4,095	84	380	865	2,604

Data Source: 2012-2016 CHAS

For those cost overburdened by more than 30%, renters are more likely to be highly affected; renter-occupied households are much likelier to be cost overburdened than owners (4,095 households vs. 2,604 households).

Table II-G-6: Cost Overburdened Greater Than 50% – City of High Point

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Small Related	1,190	485	30	1,705	160	145	220	544
Large Related	220	100	0	320	20	60	30	110
Elderly	430	255	110	865	105	195	95	410
Other	730	385	10	1,125	210	150	125	515
Total need by income	2,570	1,225	150	4,015	495	550	470	1,579

Data Source: 2012-2016 CHAS

For those who are cost overburdened by more than 50%, renters make up a higher percentage of affected households than owners based on the total number of households (71.8% of households vs. 28.2% of households).

Table II-G-7: Overcrowding Conditions – City of High Point

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Single family households	250	280	200	50	890	65	25	35	35	205
Multiple, unrelated family households	4	15	60	40	129	0	8	4	15	47
Other, non-family households	0	0	0	0	35	0	0	0	0	0
Total need by income	254	295	260	90	1,054	65	33	39	50	252

Data Source: 2012-2016 CHAS

For those households which are cost overburdened by more than 30%, renters are more likely to be highly affected; renter-occupied households are much more likely to be cost overburdened than owners. Put another way,

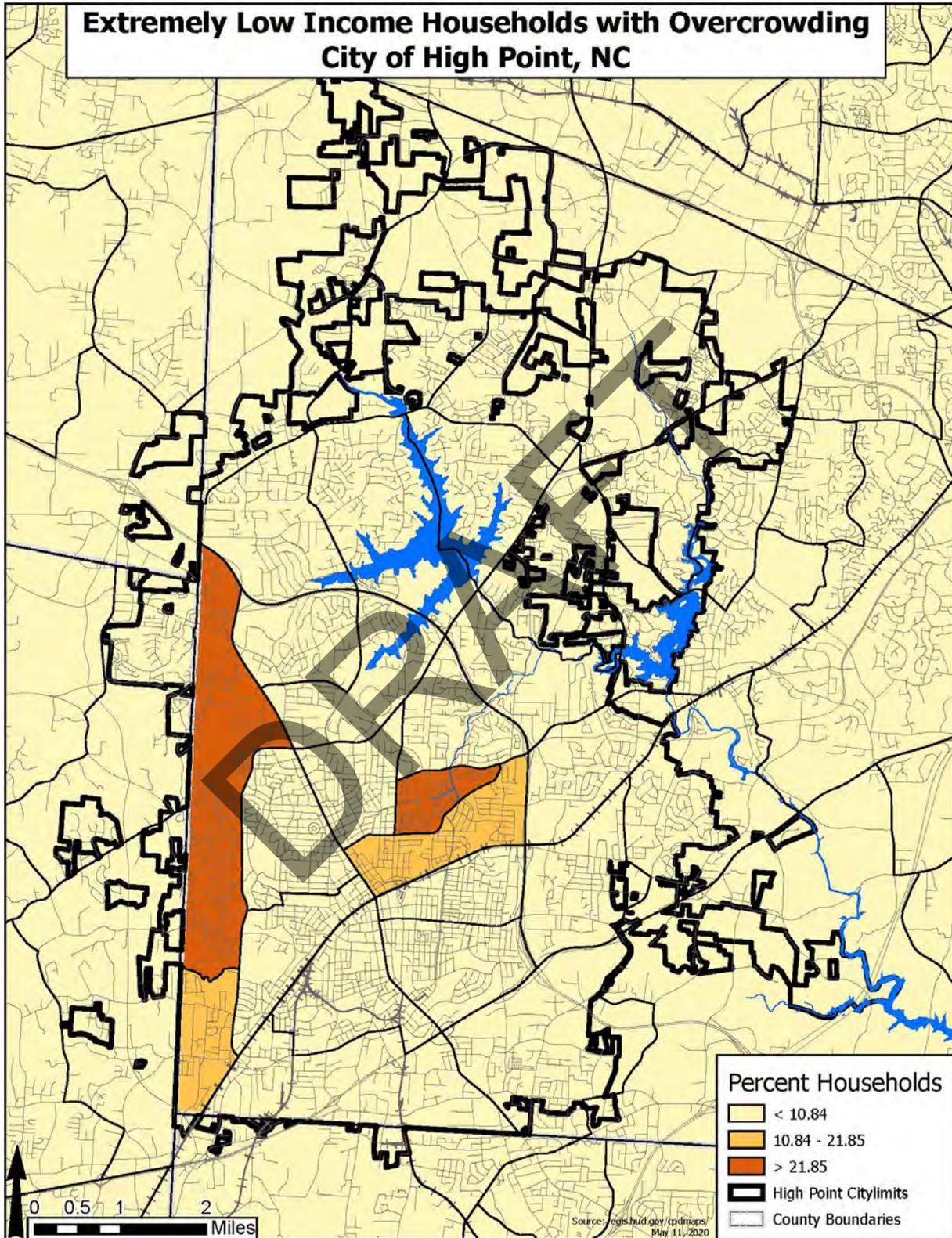
22.0% of renters are cost overburdened by 30%, while 11.7% of owners are cost overburdened by 30%.

The following three (3) maps illustrate census tracts where there is overcrowding for Extremely Low, Very Low, and Low Income Households.

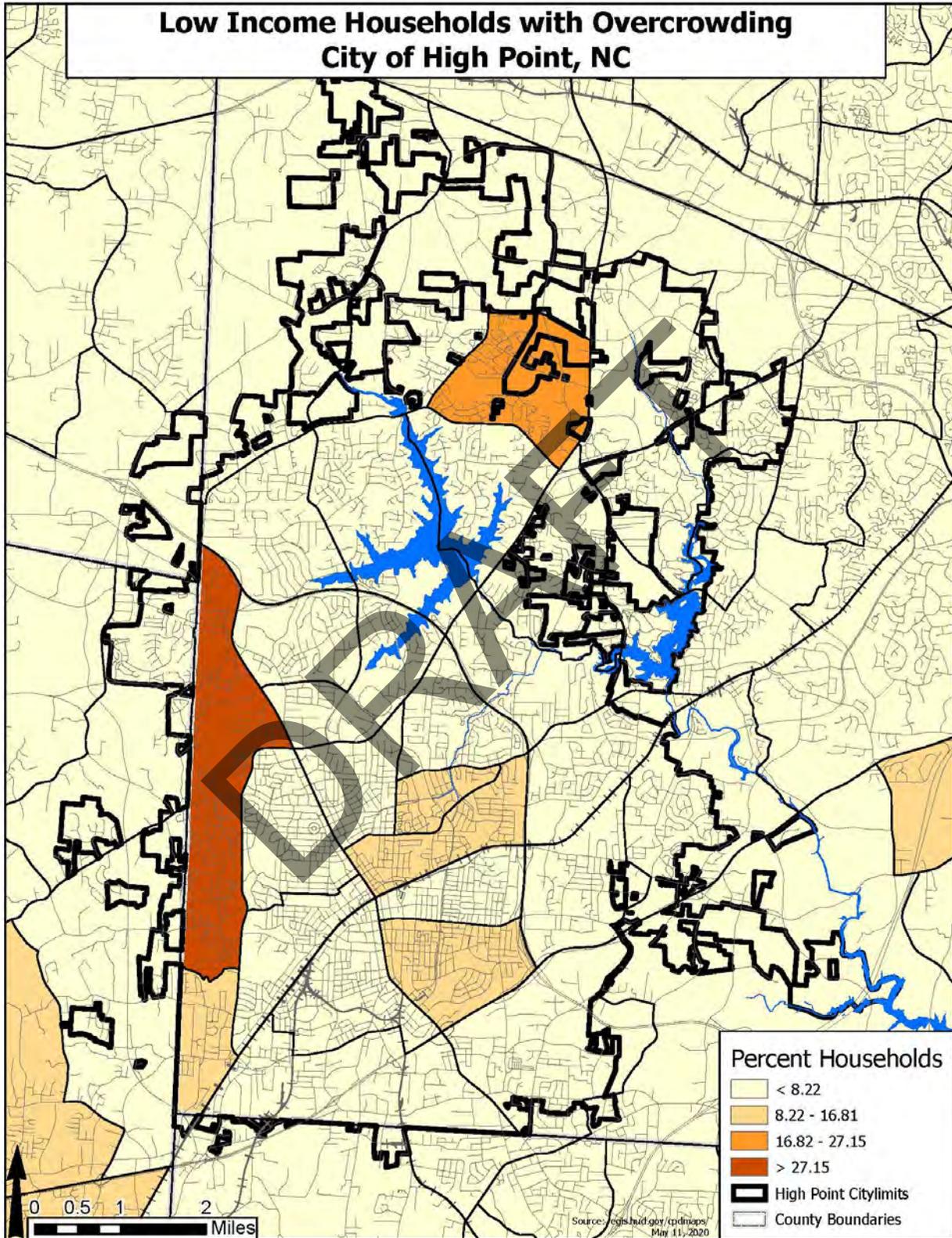
- **Map II-G-1:** Percentage Extremely Low Income Households with Overcrowding
- **Map II-G-2:** Percentage Low Income Households with Overcrowding
- **Map II-G-3:** Percentage Moderate Income Households with Overcrowding

DRAFT

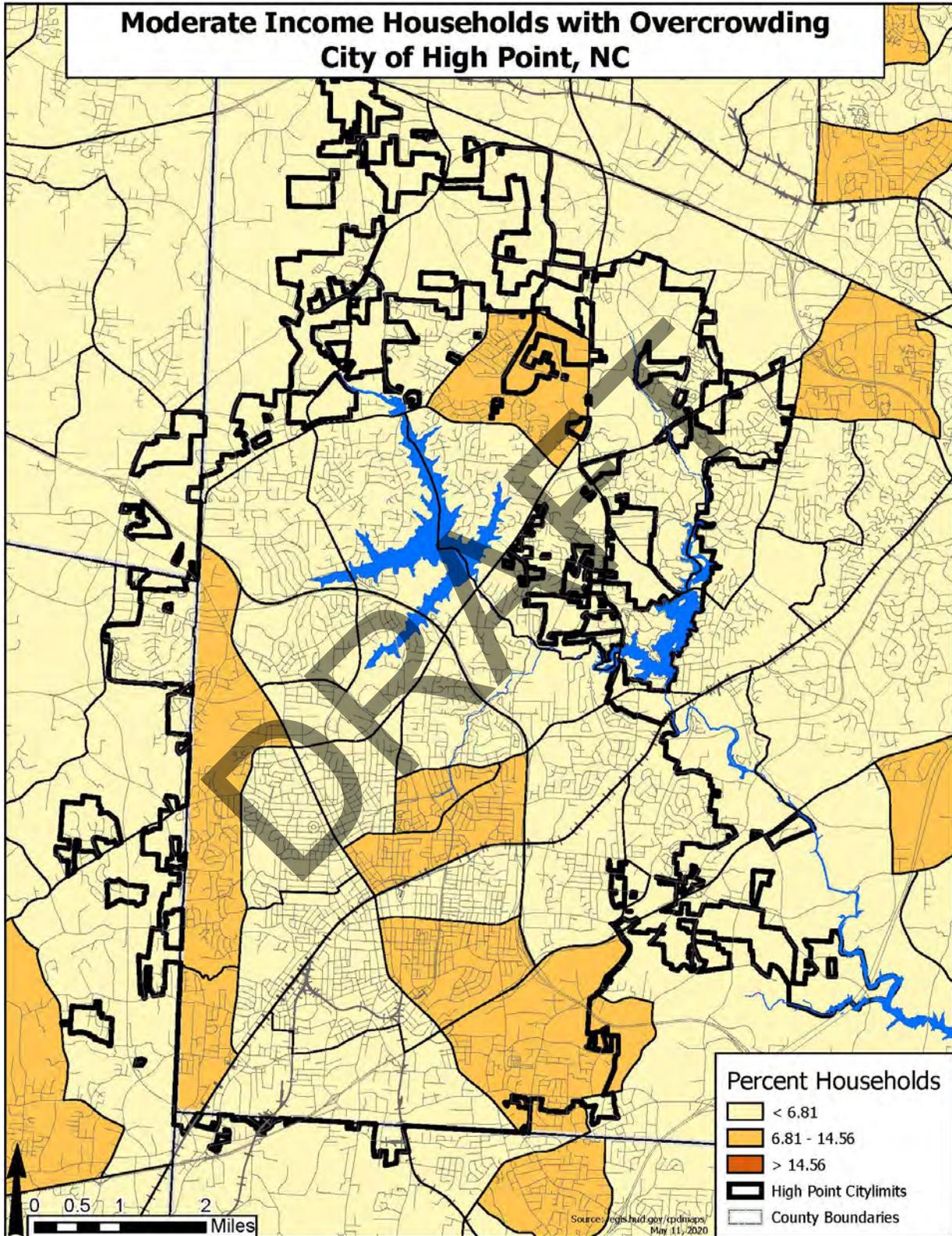
Map II-G-1



Map II-G-2



Map II-G-3



H. Cost Overburden

Overall, there is a shortage of decent, affordable housing in the City of High Point. Many of the City’s lower income households are paying more than 30% of their total household income on housing related costs. The following information was noted: 3,220 White households were cost overburdened by 30% to 50%, and 14,425 White households were severely cost overburdened by greater than 50%; 2,975 Black/African American households were cost overburdened by 30% to 50%, and 6,885 Black/African American households were severely cost overburdened by greater than 50%; and lastly, 645 Hispanic households were cost overburdened by 30% to 50%, and 1,375 Hispanic households were severely cost overburdened by greater than 50%.

Table II-H-1: Housing Cost Burden – City of High Point

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	24,600	7,539	5,950	715
White	14,425	3,220	2,405	255
Black / African American	6,885	2,975	2,720	310
Asian	1,420	545	230	80
American Indian, Alaska Native	95	0	10	10
Pacific Islander	0	0	10	0
Hispanic	1,375	645	395	45

Data Source: 2012-2016 CHAS

According to the HUD-CHAS data, there are a total of 20,305 White households and the 3,220 White households that are cost overburdened by 30% to 50% is 42.7% of the total cases of households that were considered cost overburdened by between 30% and 50%. Additionally, a total of 645 Hispanic households were considered cost overburdened by between 30% and 50%, which is 8.6% of the total cases of households that were considered cost overburdened by between 30% and 50%. A total of 2,975 Black/African American households were considered cost overburdened by

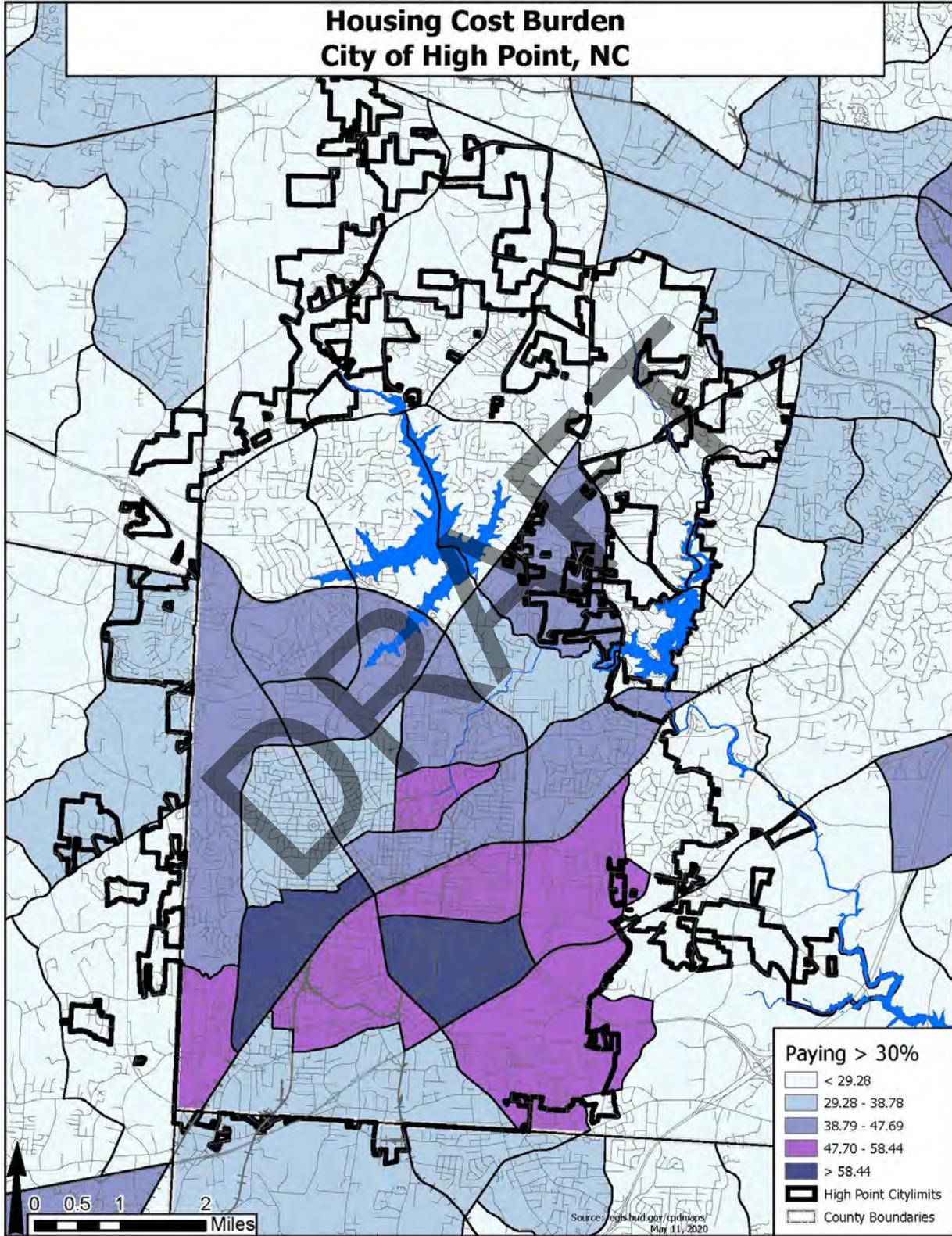
between 30% and 50%, which is 39.4% of total households in that income bracket, and 23.1% of the total 12,890 Black or African American households recorded in the dataset.

A total of 2,405 White households were considered severely cost overburdened by greater than 50%, which is 11.8% of the total number of White households recorded in the dataset. A total of 2,720 Black/African American households were considered cost overburdened by between 30% and 50%, which is 21.1% of the total cases of households that were considered cost overburdened by between 30% and 50%. A total of 395 Hispanic households were considered severely cost overburdened by greater than 50%, which is 16.1% of the total number of Hispanic households recorded in the dataset.

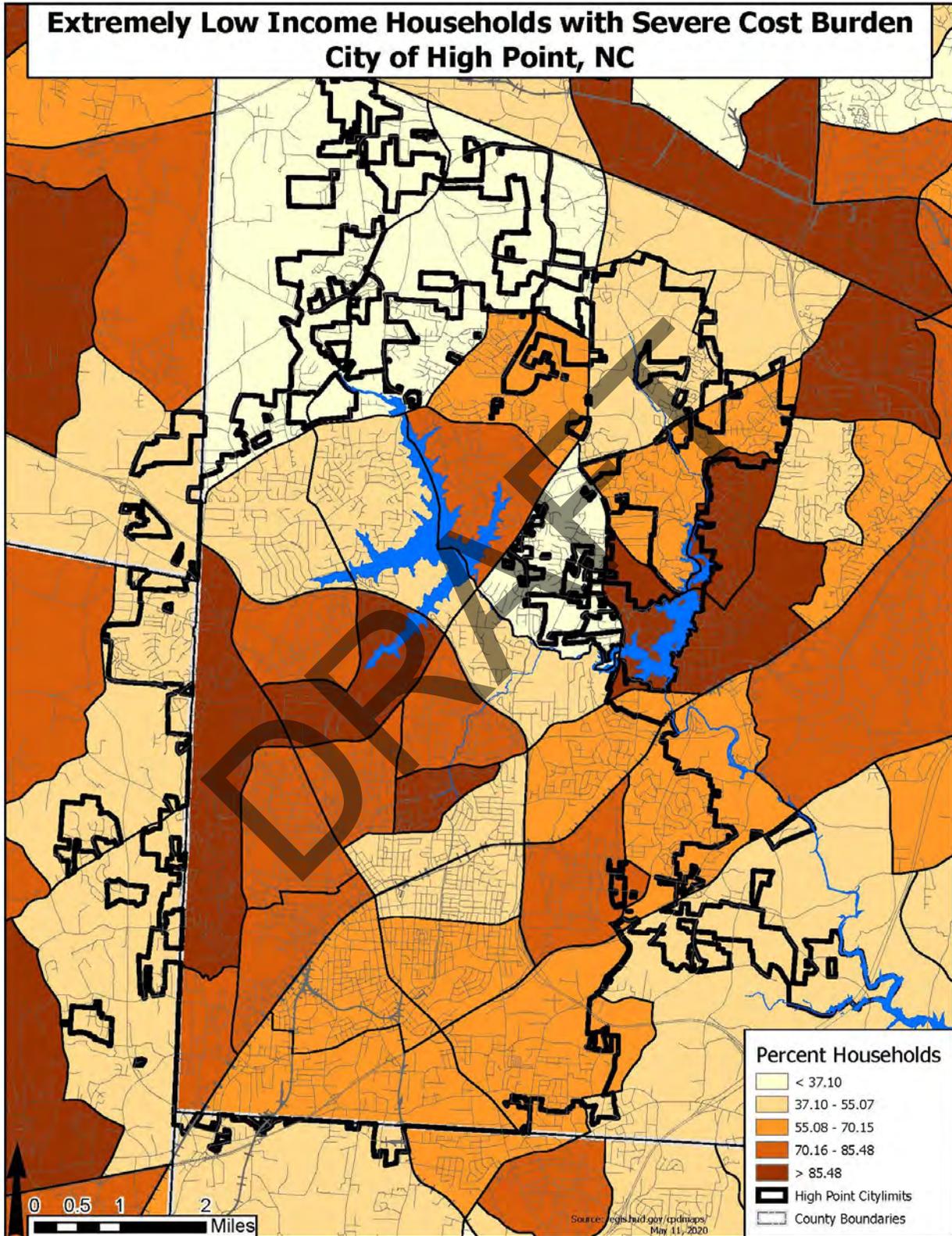
The following four (4) maps illustrate census tracts where there are housing cost overburdens for all households, Extremely Low, Very Low, and Low Income Households.

- **Map II-H-1:** Housing Cost Burden
- **Map II-H-2:** Percentage Extremely Low Income Households with Severe Cost Burden
- **Map II-H-3:** Percentage Very Low Income Households with Severe Cost Burden
- **Map II-H-4:** Percentage Low Income Households with Severe Cost Burden

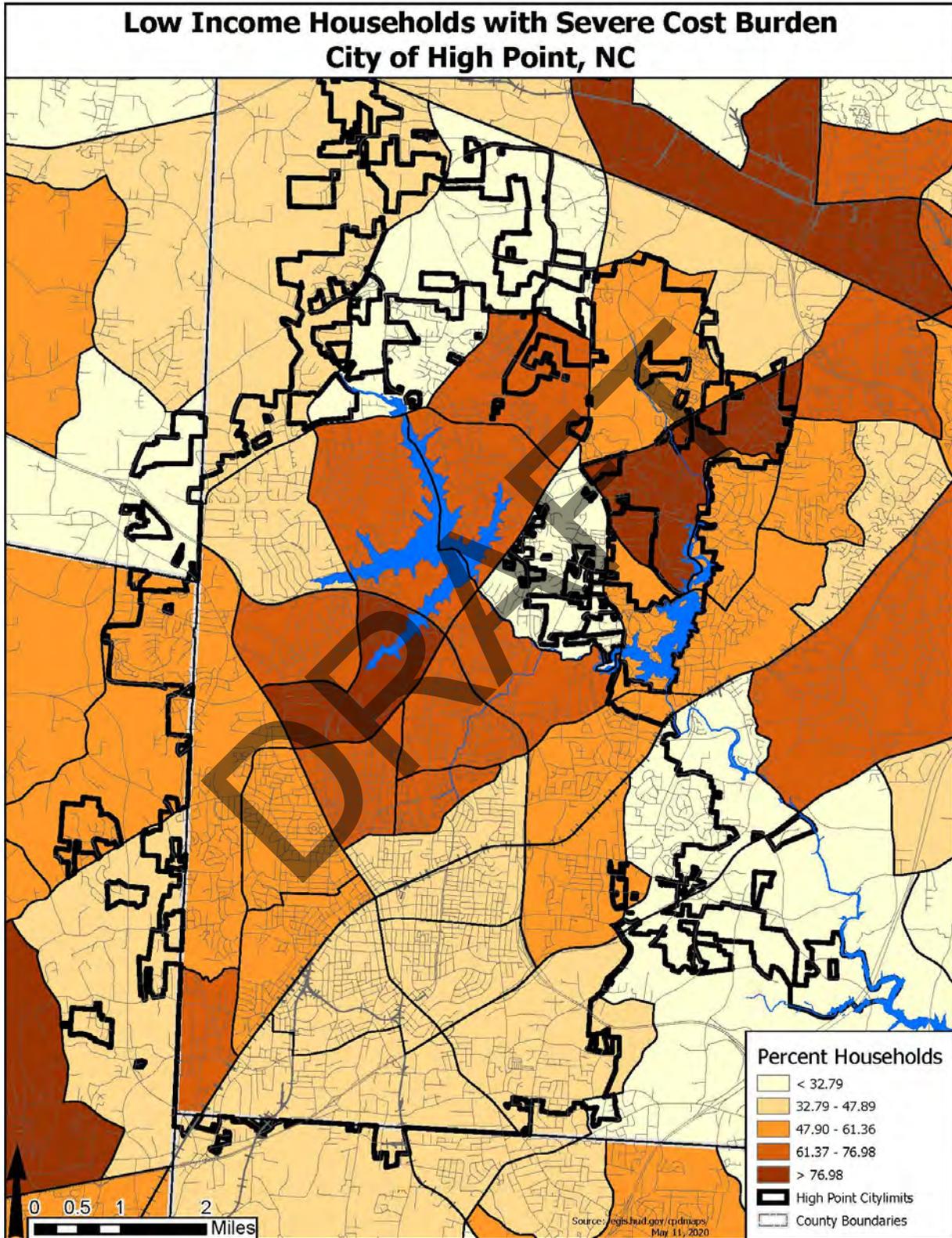
Map II-H-1



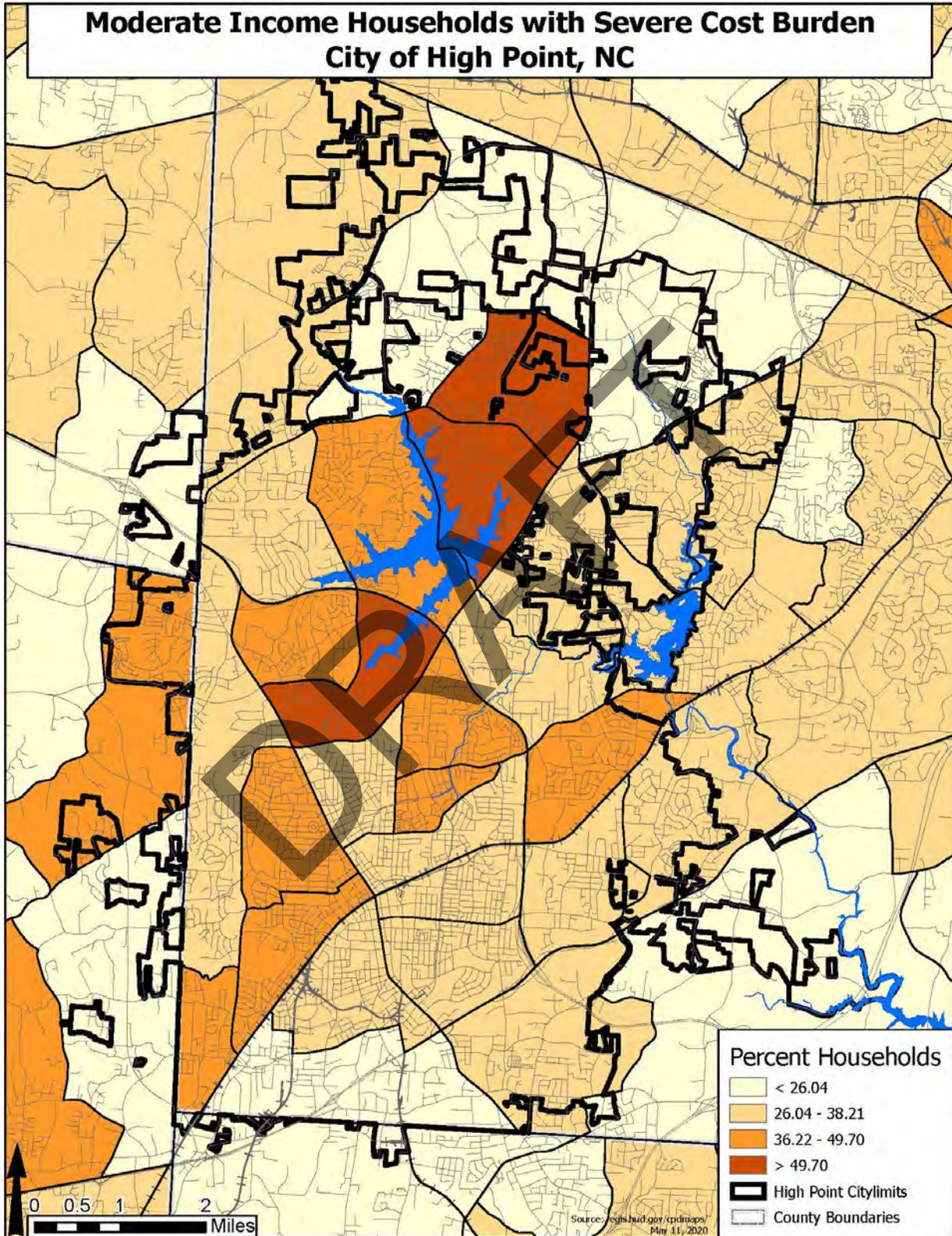
Map II-H-2



Map II-H-3



Map II-H-4



I. Housing Problems

A household is considered to have a housing problem if it contains one or more of the four (4) HUD designated housing problems; The four housing problems are: lacks complete kitchen facilities; lacks complete plumbing facilities; has more than one person per room; and is cost burden greater than 30%. The following tables illustrate the disproportionate needs in the City of High Point:

Table II-I-1: 0%-30% of Area Median Income (Extremely Low Income) – City of High Point

Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,920	544	680
White	1,080	135	225
Black / African American	2,105	325	310
Asian	165	0	80
American Indian, Alaska Native	15	4	10
Pacific Islander	0	0	0
Hispanic	355	40	45

Data Source: 2012-2016 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

The following map illustrates the location by Census Tract where extremely low-income households have severe housing problems.

Map II-I-1

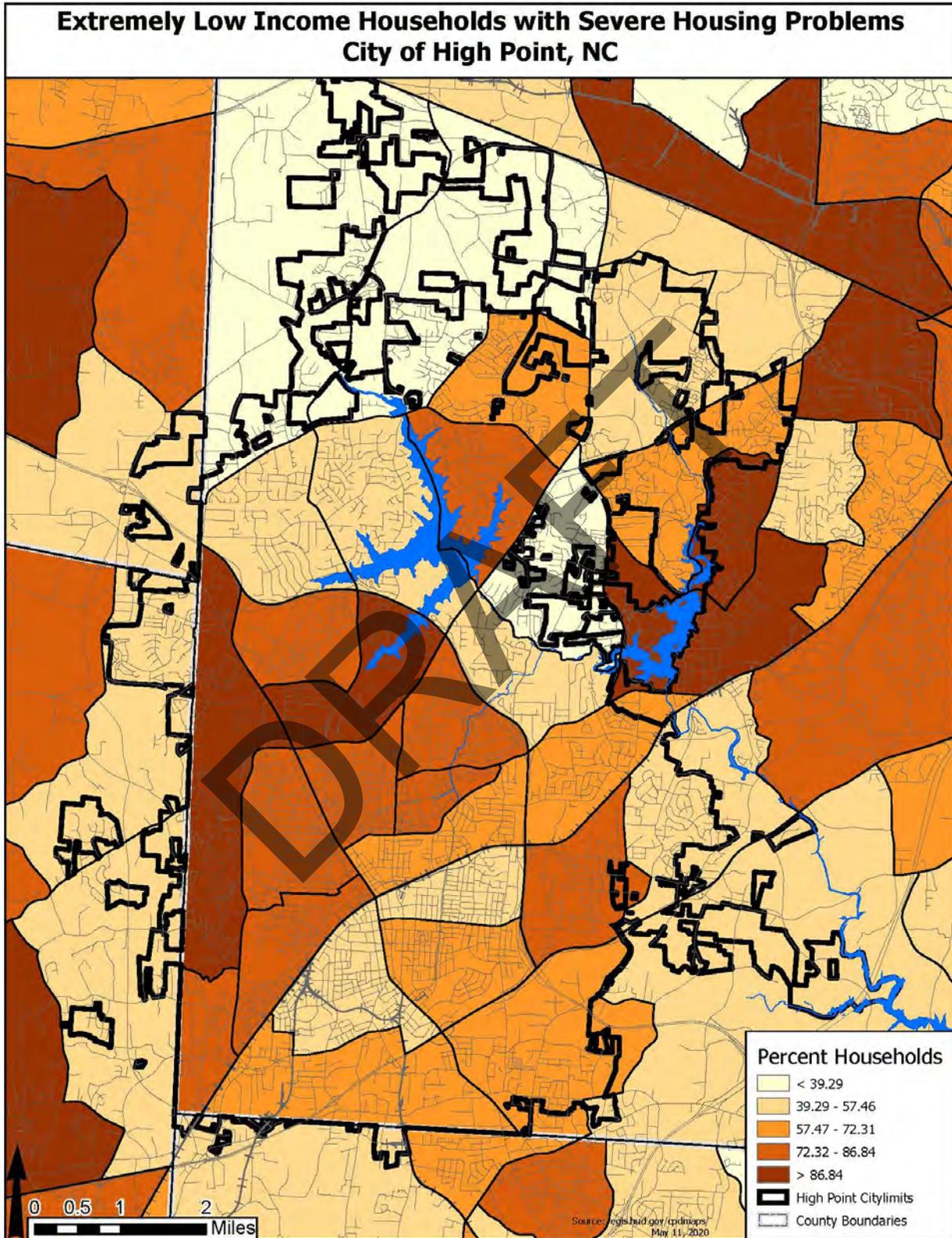


Table II-I-2: 30%-50% of Area Median Income (Low-Income) – City of High Point

Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,225	905	0
White	1,575	395	0
Black / African American	1,890	380	0
Asian	295	80	0
American Indian, Alaska Native	10	10	0
Pacific Islander	0	0	0
Hispanic	400	40	0

Data Source: 2012-2016 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

The following map illustrates the location by Census Tract where very low-income households have severe housing problems.

Map II-I-2

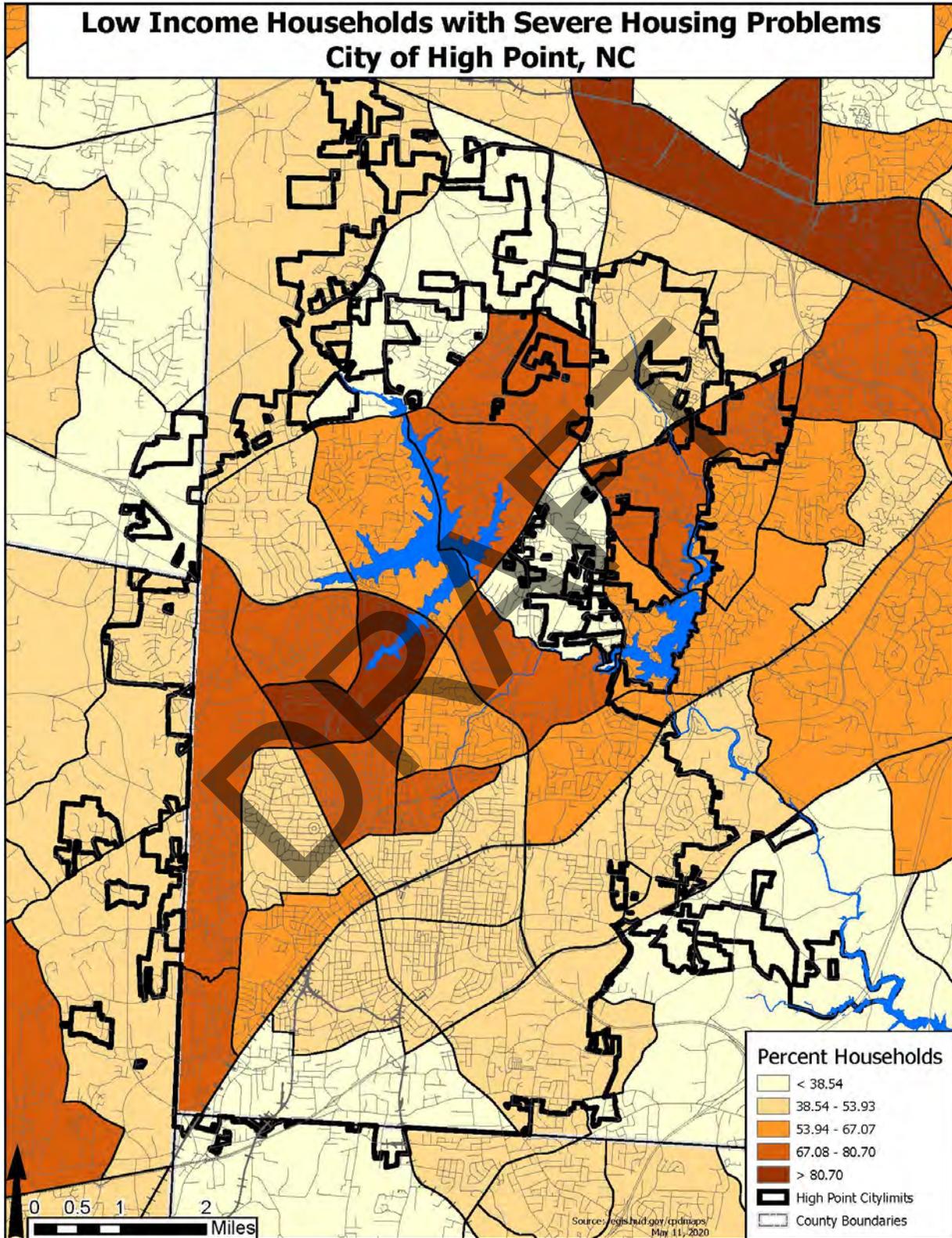


Table II-I-3: 50%-80% of Area Median Income – City of High Point

Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,715	3,345	0
White	1,745	1,435	0
Black / African American	1,345	1,460	0
Asian	215	230	0
American Indian, Alaska Native	0	25	0
Pacific Islander	0	0	0
Hispanic	345	185	0

Data Source: 2012-2016 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

The following map illustrates the location by Census Tract where low-income households have severe housing problems.

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Map II-I-3

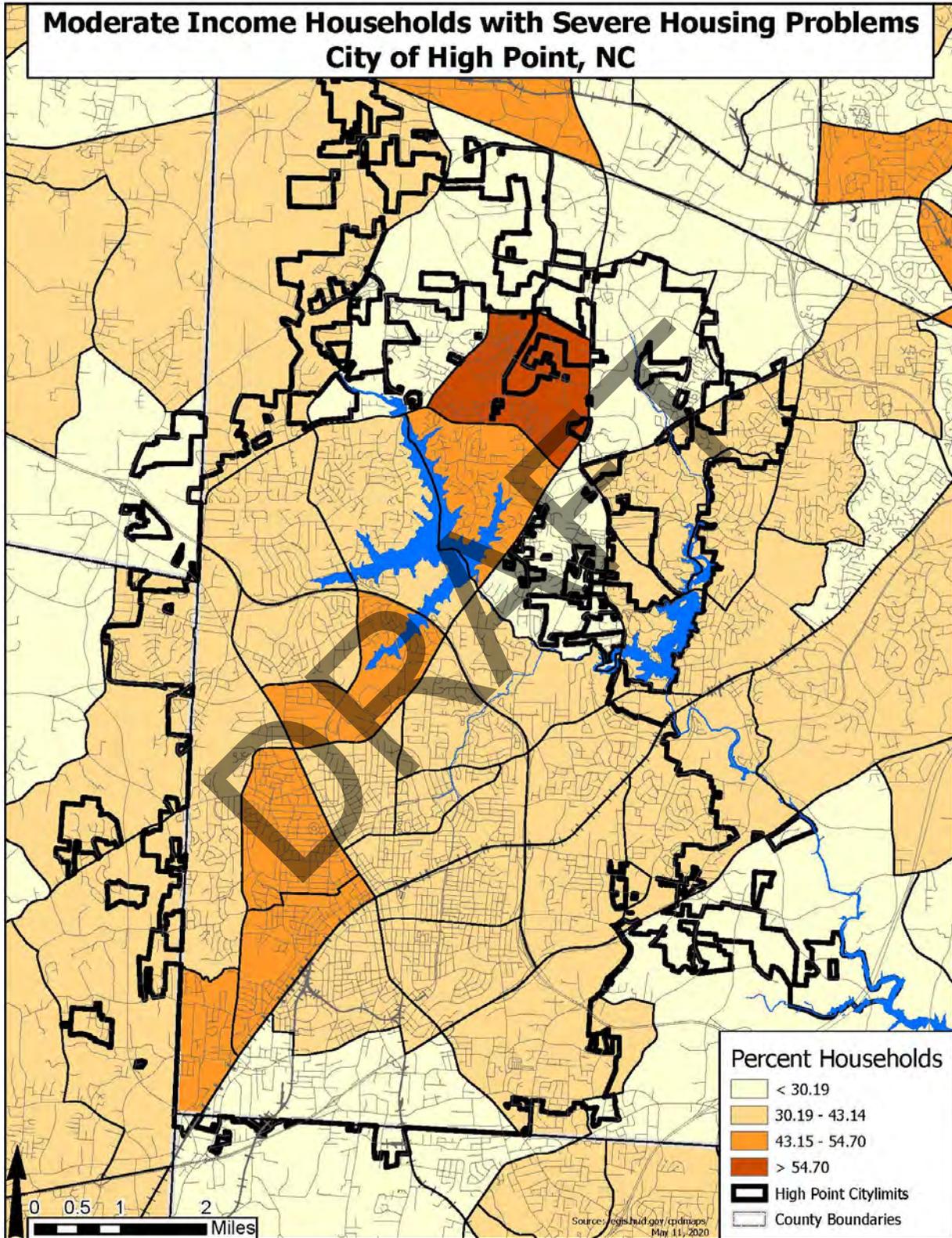


Table II-I-4: 80%-100% of Area Median Income – City of High Point

Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,035	2,438	0
White	550	1,120	0
Black / African American	225	960	0
Asian	155	150	0
American Indian, Alaska Native	0	8	0
Pacific Islander	10	0	0
Hispanic	80	155	0

Data Source: 2012-2016 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

The racial composition of households in the City of High Point, according to the 2012-2016 American Community Survey, was 53.3% White; 35.8% African American/Black; 9.1% Asian; and 1.2% American Indian. The Hispanic or Latino population was 10.1%. In the 0-30% Area Median Income category, African American/Black households had one or more housing problems, with a disproportionate need at 53.7%. In the 30-50% Area Median Income category, African American/Black households have disproportionate need at 44.7%. In the 80-100% Area Median Income category, Asians have a disproportionate amount of housing problems at 15.0%. There are no other racial or ethnic groups with disproportionate need at other income levels.

J. Disabled Households

Disabled Population

The following table includes the 2013-2017 ACS estimates for the number of disabled individuals in the City of High Point. The total population of

disabled persons in High Point is estimated to be 14,778 persons which represents 13.6 percent of the total population of the City. The two largest disability types are ambulatory and independent difficulties.

Table II-J-1: Disabled Persons in the City of High Point

Disability Status of the Civilian Non-Institutional Population	2008-2012 ACS		2013-2017 ACS	
	#	%	#	%
Total Civilian Population	103,375	-	109,016	-
Total Population with a disability	11,996	11.6%	14,778	13.6%
Population under 5 years	37	0.5%	0	0.0%
With a hearing difficulty	14	0.2%	0	0.0%
With a vision difficulty	37	0.5%	0	0.0%
Population 5 to 17 years	1,081	5.6%	954	4.7%
With a hearing difficulty	46	0.2%	37	0.2%
With a vision difficulty	91	0.5%	193	1.0%
With a cognitive difficulty	816	4.2%	684	3.4%
With an ambulatory difficulty	203	1.0%	212	1.1%
With a self-care difficulty	257	1.3%	167	0.8%
Population 18 to 64 years	6,554	10.1%	7,784	11.6%
With a hearing difficulty	859	1.3%	1,044	1.6%
With a vision difficulty	1,112	1.7%	1,449	2.2%
With a cognitive difficulty	2,775	4.3%	3,770	5.6%
With an ambulatory difficulty	3,474	5.4%	4,017	6.0%
With a self-care difficulty	1,154	1.8%	2,916	2.9%
With an independent living difficulty	2,333	3.6%	3,193	4.7%
Population 65 years and over	4,324	37.7%	6,040	41.1%
With a hearing difficulty	1,543	13.4%	2,251	15.3%
With a vision difficulty	843	7.3%	1,300	8.9%
With a cognitive difficulty	1,057	9.2%	1,910	13.0%
With an ambulatory difficulty	2,842	24.8%	4,024	27.4%
With a self-care difficulty	840	7.3%	1,262	8.6%
With an independent living difficulty	1,858	16.2%	2,908	19.8%
SEX				
Male	5,399	11.0%	6,294	12.2%
Female	6,597	12.1%	8,484	14.8%
HISPANIC/LATINO ORIGIN				
White alone	7,179	12.7%	8,032	14.4%
Black or African American alone	4,019	11.7%	5,393	14.6%
American Indian and Alaska Native alone	151	28.0%	45	14.6%
Asian alone	310	4.5%	644	7.2%

Native Hawaiian and Other Pacific Islander alone	0	0.0%	0	0.0%
Some other race alone	150	4.1%	203	5.7%
Two or more races	187	11.1%	461	15.5%
White alone, not Hispanic or Latino	6,913	13.4%	7,570	15.4%
Hispanic or Latino (of any race)	439	5.0%	693	6.2%

Source: 2008-2012 and 2013-2017 American Community Survey

The City of High Point recognizes the need for accessible and visitable housing units. The City ensures that multi-family housing developments which are rehabilitated or constructed using Federal funds, must comply with ADA requirements, and encourage visitable units beyond minimum requirements.

Another issue is a lack of affordable housing that is accessible. Public housing often has higher proportions of disabled residents and with most public housing consisting of 1-bedroom units, it is difficult for families and larger households with disabled members to find housing that is both accessible and affordable. The Housing Authority of the City of High Point responds to requests for reasonable accommodations and modifications in a timely manner.

There is a disparity between accessibility compliance of single-family and multi-family housing in the City. Much of the older single-family housing stock is not accessible, and newer single-family housing units are not required to meet the same accessibility standards of multi-family housing, so newer single-family homes also often have accessibility issues. The Fair Housing Act requires that multifamily properties built after 1991 meet Federal accessibility standards; therefore, multifamily housing units built after 1991 must be in compliance with Federal Law and meet the minimum level of accessibility. For this reason, multi-family units are more likely to be accessible, especially if they are newer. Older multi-family housing can still have accessibility issues. However, as 58.2% of housing units in the City of High Point were built prior to 1990, many of these units are more likely to have narrow halls, stairs, narrow doors, and little room for ramps to entrance doors.

The City of High Point funds a variety of home repair and rehabilitation programs owner-occupied housing. These programs will be used to make accessibility improvements to the existing housing stock.

Government and Housing Authority Facilities:

The City of High Point does not discriminate on the basis of disability for access, to nor operations of, its programs, services, or activities. If a resident of the City of High Point requires additional assistance to gain access to City facilities, he or she may contact the designated ADA Coordinator, Marquis H. Barnett, Human Resources Manager. The Coordinator can be contacted at: 211 S. Hamilton Street, High Point, NC (Phone: 336-883-3629). For matters outside of the City of High Point, a resident should contact the ADA Coordinator of the relevant County.

The Housing Authority of the City of High Point may provide reasonable modifications upon request. When a tenant requests an accommodation, the Housing Authority may verify the disability only to the extent necessary to ensure the applicants are entitled to the preference. However, the Housing Authority will not ask what the disability is. Once modifications are deemed reasonable, the work will be coordinated with the tenant; if the modifications are tantamount to those required for a fully accessible unit, the tenant/applicant will be placed on an Authority transfer/waiting list for the next available unit with the features requested, if so desired.

Public Improvements:

The City of High Point administers funds through the Federal Community Development Block Grant (CDBG) program to benefit low- and moderate-income areas. The City of High Point will make public improvements to infrastructure associated with housing development that is financed by tax credits to increase accessibility to the developments. The City of High Point also promotes partnerships with organizations that make accessibility improvements to housing during housing rehabilitation, and meets all accessibility requirements for new rental housing development.

Schools:

School districts are responsible for the provision of special education and related services for every student with a disability under the Individuals with Disabilities Education Act (IDEA) and Section 504 of the Rehabilitation Act of 1973. Section 504 complaints can be made through the US Department of Education. Children eligible under Section 504 are entitled to supports and services which are delivered through a 504 plan. Parents are entitled to rights outlined in Guilford County Schools' Section 504 Notice of Student and Parent Rights, and can file a grievance if they have any classroom concerns

related to Section 504. Guilford County Schools requests that concerns with specific teachers are directed toward either the schools' principal, or the district's 504 coordinator. Complaints can also be directed toward Guilford County Schools' Supervisor of Section 504.

- **Guilford County Schools**
Supervisor of Section 504
Charissa Cowley
2500 Lees Chapel Road
Greensboro, NC 27405
Phone: 336-375-2394 x722127
<https://www.qcsnc.com/Page/9678>

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III. Review/Update to Original Plan

In FY 2014, the City of High Point, NC, partnered with the Cities of Burlington and Greensboro, as well as the Surry HOME Consortium, to create an Analysis of Impediments to Fair Housing Choice (AI) and an Assessment of Fair Housing (AFH) to evaluate the housing conditions in the region. The analysis was intended to focus on the region to serve as a basis for fair housing planning for the cities Federal Entitlement programs. The following paragraphs that referred specifically to High Point were identified impediments from the 2014 Analysis of Impediments to Fair Housing Choice and summarize the progress made on each for the time period of 2014 through 2019.

A. Summary of 2014 Impediments – City of High Point

- **Program Improvements Needed:**

- Incorporate required compliance with the Federal Fair Housing Act in all HUD program sub-recipient agreements.
- Adopt a policy to refrain from providing Federal HUD funds to any sub-recipient that has engaged in discriminatory behavior as it relates to housing.
- The HOME Program must include and implement the Site and Neighborhood Standards (found at 24 CFR 983.6) for rehabilitation and new construction activities to prevent concentration of affordable housing opportunities in lower opportunity, minority neighborhoods.

Accomplishments:

The City of High Point has taken the following actions to reach this goal:

- The City of High Point incorporated the compliance language from the Fair Housing Act into its subrecipient agreements in 2015.
- The City of High Point adopted a policy to refrain from providing Federal HUD funds to any subrecipients engaging in discriminatory behavior as it relates to housing as of 2015 onward.

- The City incorporated Site and Neighborhood Standards for rehabilitation in its guidelines for construction and rehabilitation activities as of 2015.

- **Zoning Ordinance Impediments:**

- The zoning ordinance places a siting buffer on group homes that is consistent with state law but inconsistent with the Fair Housing Act.
- The zoning ordinance lacks a reasonable accommodation provision for persons with disabilities to request a modification to the statute.
- The zoning ordinance restricts homeless shelters to nonresidential districts.
- The zoning ordinance requires an overlay district or special permit for manufactured housing.

Accomplishments:

The City of High Point has taken the following actions to reach this goal:

- A new City Development Ordinance was adopted in May 2016 and included the following effective as of January 2017:
 - Subsection 2.4.9 – addresses reasonable accommodation for handicapped or disabled persons.
 - Subsection 3.5.6 – residential uses located within a mixed-use building are exempted from Minimum Off-Street Parking Standards.
 - Subsection 4.3.3 – includes single room occupancy (SRO) as a residential use classification.
 - Subsection 4.4.4 – addresses standards for residential accessory structures.
 - Subsection 5.4.7 – handicap accommodations for off-street parking.
 - Subsection 5.5.8 – handicap ramps are permitted in required landscaped yards.
 - Subsection 4.1.9 – Social Service Facilities, which include homeless shelters, orphanages, shelters for victims of domestic abuse, crisis centers, halfway houses, and drug and alcohol treatment facilities, are permitted in the City’s Residential Multifamily districts.

- Subsection 4.3.2 – North Carolina State Law requires group homes to be one mile away from each other. This is currently being adjudicated in court. The zoning ordinance addresses this by using the definition “social service facility,” which has no distance requirements.

- **Housing Affordability Impediments:**

- The absence of public policy that results in the creation of affordable housing in higher opportunity areas.
- An inadequate supply of decent, affordable housing for low- and moderate-income households, including affordable housing that is accessible to persons with disabilities.

Accomplishments:

The City of High Point has taken the following actions to reach this goal:

- Council allocated an additional \$1,000,000 for Core City activities through 2015 and 2016.
- Supported the development of Kirkwood Crossing, an 84-unit LIHTC development (\$2 million – Section 108) in 2016, located in a high opportunity area.
- Received HUD approval to provide \$694,000 in Section 108 funding in support of Hartley Ridge, an 84-unit LIHTC development (project awarded LIHTCs in August 2016) in 2016, located in a high opportunity area.
- Supported the development of Avondale Terrace, a 72-unit LIHTC development (\$654,000 – Section 108) in 2018, located in a high opportunity area.
- Provided 7 Core City Homebuyer Incentive loans totaling \$52,500 in 2015.
- Provided 53 Homebuyer Assistance Loans City-wide and in the Core City totaling \$382,500 in 2016.
- CDBG funds were used to address lead hazards on 3 properties totaling \$51,325.
- Provided seventy-nine (79) Core City Homebuyer Initiative loans.
- Provided emergency repairs 201 housing units.

- **Racial Poverty Concentration Impediments:**

- Sixteen out of the City's 67 block groups (23.8%) were identified as RCAP areas.
- The concentration of assisted housing in RCAP and other low- and moderate-income census tracts.
- A lack of paired testing in the housing market.

Accomplishments:

The City of High Point has taken the following actions to reach this goal:

- Kirkwood Crossing, Hartley Ridge, and Avondale Terrace projects are located in areas of high opportunity and serve to deconcentrate RCAPs.
- A total of 354 participants attended monthly homebuyer education classes.
- A total of 81 families participated in four IDA classes.
- Established 9 community gardens providing access to fresh foods.
- Provided seventy-nine (79) Core City Homebuyer Initiative loans.
- Submitted an application to the State to use NSP program income for public infrastructure in or near RCAPs.
- Provided technical assistance and support to eleven neighborhood associations/watch groups in the Core City in 2016.
- Provided funding and technical assistance to twelve organizations through public service programs and community based initiatives totaling \$43,030 in 2016.

IV. Impediments to Fair Housing 2020

Housing barriers affecting residents of the City of High Point were identified through a robust citizen participation process, which included a series of two (2) public meetings, eleven (11) small interview sessions (with City Departments, Housing Authority Staff, housing residents, and local housing groups), and 28 completed resident surveys.

A. Fair Housing Complaints

1. City of High Point Human Relations Division

The High Point Human Relations Division's Mission is "To promote equality of opportunity for citizens of High Point by advocating policies of nondiscrimination and serving as an informational resource regarding City, State and Federal laws that prohibit discrimination in employment, fair housing and public accommodation." The Human Relations Division investigates discrimination of fair housing and conducts trainings to educate landlords, tenants, and the general community on issues of fair housing and equal opportunity. Over the previous five year period, the High Point Human Relations Division has conducted the following investigations and trainings:

City of High Point Human Relations Division
211 S Hamilton Street
2nd Floor, Suite 205
High Point, North Carolina, 27261
336-883-3124
<https://www.highpointnc.gov/1390/Human-Relations-relations>

Telephone Calls

2019:

- 38 Landlord/Tenant Disputes
- 26 Customer Service (i.e. requesting information about organizations that provide financial assistance for utility bills, first time homeowner programs and housing shelters contact information, etc.)
- 5 Employment Rights (i.e. Employer did not pay employee for time worked)
- 5 Fair Housing Discrimination (3 disability; 2 did not disclose protected class but were referred to NC HRC for investigation)

- 2 Discrimination (citizens that have faced discrimination in High Point but not necessarily housing related discrimination)

Office Visits

2019:

- 30 Landlord/Tenant Disputes (i.e. information about organizations that provide financial assistance for utility bills, first time homeowner programs Swim Passes, etc.)
- 27 Customer Service
- 3 Fair Housing Discrimination (2 disability; 1 race)
- 3 Discrimination (i.e. experiencing discrimination at a Staffing Service)

Trainings Conducted

2018:

- Know your rights, “Students Edition”—HPU Students—50 people
- Cultural Diversity—High Point Association of Realtors—16 people
- Fair Housing for Seniors—HP Housing Coalition – 50 people
- Know Your Rights—Nurse Family Partnership—54 people
- Housing Needs for Elderly and Disabled—Triad Food Pantry –36 people
- Housing needs for Immigrant Community/Survey –World Relief—45 people
- Community Roundtable –48 people

The High Point Human Relations Commission partners with the High Point City Council and to advocate for improving human relations among diverse racial, ethnic, and religious groups.

Any complaints can be directed to the City of High Point’s Fair Housing Officer, who will direct complaints to the High Point Human Relations Division.

- **Human Relations Manager**
Jelani Biggs
211 S. Hamilton Street
Suite 205
336-883-3125

jelani.biggs@highpointnc.gov

2. North Carolina Office of Administrative Hearings – Human Relations Commission

The North Carolina Office of Administrative Hearings, Human Relations Commission (NCHRC) is the primary educator and enforcer of North Carolina’s Laws Against Discrimination.

North Carolina
 Office of Administrative Hearings
 Human Relations Commission
 1711 Hope Church Road
 Raleigh, NC 27609
 919-431-3000 (Voice)
 919-431-3100 (Fax)

In addition to its staff members, the North Carolina Office of Administrative Hearings, Human Relations Commission has twenty-two (22) Commissioners. Eighteen (18) are appointed by the Governor with the advice and consent of the Senate, two (2) are chosen by the Speaker of the House, and two (2) are chosen by the President of the Senate Pro Tempore.

The NCHRC filed the following forty (40) cases between July 1, 2018 and June 30, 2019:

Table IV-A-1: NCHRC Cases Filed in Guilford County, July 1, 2018-June 30, 2019

Case #	Basis	Issue(s)	County	Date Filed
18HO2114	Race, Familial Status	Discriminatory terms and conditions – Refusal to Rent	Iredell	7/31/2018
18HO2115	Handicap	Discriminatory terms and conditions – Refusal to Rent	Wake	8/31/2018
18HO2117	Familial Status	Discriminatory terms and conditions – Refusal to Rent	Cumberland	9/21/2018
18HO2118	Handicap	Discriminatory advertising, statements, and notices	Pitt	9/26/2018
18HO2116	Handicap	Refusal to provide reasonable accommodations	Mecklenburg	10/4/2018
18HO2119	Race	Discriminatory terms/conditions/ privileges relating to sale	Wake	10/30/2018
18HO2121	Handicap	Discriminatory terms/conditions/ privileges or services and facilities	Guilford	11/1/2018
18HO2120	Race, Handicap	Refusal to provide reasonable modifications	Lee	11/1/2018

Impediments to Fair Housing 2020

18HO2123	Familial Status, Handicap, Race, Color	Refusal to provide reasonable accommodations	Wake	11/29/2018
18HO2122	Handicap	Refusal to provide reasonable accommodations	Pitt	11/29/2018
18HO2124	Familial Status, Handicap	Refusal to provide reasonable accommodations	Alamance	12/7/2018
18HO2125	Race, Handicap	Refusal to provide reasonable accommodations	Buncombe	12/7/2018
18HO2126	Handicap	Refusal to provide reasonable accommodations	Wake	12/21/2018
18HO2127	Handicap	Refusal to provide reasonable accommodations	Catawba	12/21/2018
19HO2130	Handicap	Refusal to provide reasonable accommodations	Cumberland	4/3/2019
19HO2128	Handicap	Refusal to provide reasonable accommodations	Wilkes	4/8/2019
19HO2129	Sex, Handicap, Race	Discriminatory act under Section 818 (coercion, etc.)	Iredell	4/12/2019
19HO2135	Handicap	Refusal to provide reasonable accommodations	Cumberland	4/23/2019
19HO2133	Handicap	Refusal to provide reasonable accommodations	Robeson	4/25/2019
19HO2136	Handicap	Refusal to provide reasonable accommodations	Wake	4/25/2019
19HO2134	Race, Familial Status, Handicap	Refusal to provide reasonable accommodations	Mecklenburg	4/26/2019
19HO2137	Handicap	Refusal to provide reasonable accommodations	Cumberland	4/30/2019
19HO2138	Race, National Origin	Discriminatory in terms/conditions/privileges or services and facilities	New Hanover	5/7/2019
19HO2143	National Origin, Religion	Discriminatory in terms/conditions/privileges relating to sale	New Hanover	4/15/2019
19HO2144	Race	Discriminatory in terms/conditions/privileges or services and facilities	Wake	5/23/2019
19HO2142	Handicap	Refusal to provide reasonable accommodations	Johnston	5/228/2019
19HO2140	Sex, Familial Status	Discriminatory in terms/conditions/privileges or services and facilities	Stokes	5/28/2019
19HO2139	Familial Status	Discriminatory in terms/conditions/privileges or services and facilities	Avery	5/28/2019

19HO2156	Race	Discriminatory act under Section 818 (coercion, etc.)	Cumberland	5/30/2019
19HO2145	Handicap	Refusal to provide reasonable accommodations	Wake	6/3/2019
19HO2146	Handicap	Refusal to provide reasonable accommodations	Wake	6/3/2019
19HO2147	Race, Handicap	Refusal to provide reasonable accommodations	New Hanover	6/4/2019
19HO2151	Handicap	Refusal to provide reasonable accommodations	Scotland	6/5/2019
19HO2148	Handicap, Race	Refusal to provide reasonable accommodations	Brunswick	6/10/2019
19HO2155	Handicap	Refusal to provide reasonable accommodations	Randolph	6/13/2019
19HO2160	Race	Discriminatory terms and conditions – refusal to rent	Wake	6/17/2019
19HO2154	Handicap	Refusal to provide reasonable accommodations	Wake	6/26/2019
19HO2149	Race	Discriminatory in terms/conditions/privileges or services and facilities	Union	6/26/2019
19HO2150	Sex	Refusal to provide reasonable accommodations	Herford	6/26/2019
19HO2152	Handicap	Refusal to provide reasonable accommodations	Wake	6/21/2019

Of the forty (40) cases filed, one (1) was filed in Guilford County, making up 2.5% of all cases filed. Handicap was the most common basis for a complaint, making up 28 cases (70%).

3. Fair Housing & Equal Opportunity (FHEO-HUD)

The U.S. Department of Housing and Urban Development's (HUD's) Office of Fair Housing & Equal Opportunity (FHEO) receives complaints regarding alleged violations of the Federal Fair Housing Act. From January 1, 2014 to December 31, 2019, 15 fair housing complaints originated within Guilford County. HUD-FHEO Complaints are sent to NCHRC for adjudication. Attached is a listing for all the FHEO Complaints received and the status or resolution of the complaint.



The fair housing complaints in Guilford County that were filed with HUD are disaggregated in the following table to illustrate the most common basis of complaints. In Guilford County, disability/ handicap (66.7%) was the most common basis for a complaint filed between July 1, 2013 and December 31, 2019, with race (53.3%) and sex (13.3%) as the second and third most common causes for complaint, respectively. It is important to note that four (4) complaints identified a multiple basis in Guilford County, three (3) of which included both disability and race. The following table compares the frequency of each basis of complaint for the City of High Point and all other areas of Guilford County. Complaints based on disability were the most common in the City of High Point, at 80.0% of all complaints in the City of High Point. High Point was the most frequent location of complaints at 66.7% of total complaints in the County. 10 complaints were filed in High Point, 2 complaints were filed in Jamestown, 1 complaint was filed in Colfax, 1 complaint was filed in Greensboro, and 1 complaint was filed in Gibsonville.

The following table entitled “Basis for Housing Complaints” summarizes all of the complaints filed with the HUD Office of Fair Housing & Equal Opportunity between July 1, 2014 and December 31, 2019 in Guilford County.

Table IV-A-2: Basis for Housing Complaints Between 01/01/2014 to 12/31/2019 for Guilford County, NC

Basis	Guilford County (not including High Point)		City of High Point	
	Count*	% of County Complaints	Count*	% of County Complaints
Race	3	20.0%	4	26.7%
Disability	2	13.3%	8	36.3%
Familial Status	0	0.0%	0	0.0%
National Origin	0	0.0%	0	0.0%
Retaliation	0	0.0%	9	40.9%
Sex	1	6.7%	1	6.7%

Impediments to Fair Housing 2020

Color	1	6.7%	0	0.0%
Religion	1	6.7%	0	0.0%

Source: North Carolina Human Relations Commission

**Note: Each complaint may include multiple bases, so the counts do not add up to the total number of complaints*

Based on the previous table, race was the most common basis for a fair housing complaint, weighted heavily by complaints based on race in the City of High Point and comprise 75.0% of total fair housing complaints about race in the County. The most common complaint type in the County is Retaliation, at 40.9% of complaints. However, disability is the most common protected class basis for complaint in the County. This aligns with a national trend, where disability has overtaken race as the most common basis for a complaint. Disability discrimination complaints make up 36.3% of all protected class complaints filed in the entire Guilford County, with Race (26.7%) and Sex (6.7%) as the second- and third-most stated protected class basis. Color and Religion were the fourth- and fifth-most common basis for all complaints in the County.

The following table illustrates how complaints were closed. There were 15 complaints filed in Guilford County from January 1, 2014 through December 31, 2019. However, some complaints had a multiple basis, so the following chart shows 22 complaints. Totals reflect the number of complaints with multiple bases considered. Of the 15 total complaints, five (5) complaints were closed because of “no cause” and three (3) were “conciliated/settled,” and two (2) were “withdrawn.” In other words, over two-thirds (66.7%) of all complaints either lacked evidence or were easily settled.

Table IV-A-3: How Complaints Were Closed in Guilford County, NC

Basis	How Closed					
	No Cause	Charged or FHAP Caused	Conciliated/ Settled	Administrative Closure	Complaint Withdrawn after Resolution	Open
Race	4	1	1	0	2	0
Familial Status	0	0	0	0	0	0
Disability	5	0	4	0	1	0
National Origin	0	0	0	0	0	0
Retaliation	0	0	0	0	0	0
Color	1	0	0	0	0	0
Sex	1	0	0	0	1	0
Religion	1	0	0	0	0	0
Total*	12	1	5	0	4	0

Source: North Carolina Human Relations Commission

**Note: Each complaint may include multiple bases, so the counts do not add up to the total number of complaints*

The following table illustrates the dates complaints were filed in Guilford County. The largest yearly number of complaints filed with HUD was in 2016.

**Table IV-A-4: HUD Date Filed of Complaints
Guilford County, NC**

HUD Date Filed	Guilford County	
	Count	% of County Complaints
2014	3	20.0%
2015	1	6.7%
2016	5	33.3%
2017	3	20.0%
2018	2	13.3%
2019	1	6.7%

Source: North Carolina Human Relations Commission

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The following table entitled “HUD-FHEO Complaints” summarizes all of the complaints filed with the HUD Office of Fair Housing & Equal Opportunity between January 1, 2014 and December 31, 2019 in Guilford County.

Table IV-A-5: HUD-FHEO Complaints for Guilford County, NC

Violation City	Filing Date	Bases	Issues	Closure Reason
High Point	2/5/2014	Disability	Discriminatory terms and conditions, privileges, services and facilities; Failure to make reasonable accommodations	No Cause Determination
Greensboro	3/12/2014	Race	Discriminatory advertisement, statements and notices; Discrimination in services and facilities relating to rental	Conciliation/ Settlement Successful
High Point	4/30/2014	Disability	Discriminatory advertising, statements and notices; Discriminatory terms and conditions, privileges, services and facilities; Otherwise deny or make housing unavailable; Failure to make reasonable modification; Failure to make a reasonable accommodations	Conciliation/ Settlement Successful
High Point	7/30/2014	Race, Sex, Disability	Discriminatory terms and conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, etc); Failure to provide reasonable accommodations, Discriminatory advertising, statements and notices,	No Cause Determination
Jamestown	9/24/2015	Race	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, etc)	No Cause Determination
Jamestown	11/4/2015	Race, Disability	Discriminatory refusal to sell and negotiate for sale; Discriminatory advertising, statements and notices, Discrimination in the selling of residential property - Other discriminatory acts	No Cause Determination
Gibsonville	11/5/2015	Disability	Otherwise make housing unavailable; Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/ Settlement Successful
High Point	2/19/2016	Disability	Discriminatory terms and conditions, privileges, or services and facilities; Failure to provide reasonable accommodations	Conciliation/ Settlement Successful
High Point	5/11/2016	Race, Sex, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, etc); Discriminatory advertising, statements and notices	Withdrawn
Colfax	8/10/2016	Race, Color, Religion	Discriminatory refusal to sell and negotiate for sale; Discriminatory advertising, statements and notices,; False denial or representation of availability – sale	No Cause Determination
High Point	5/25/2017	Race	Refusal to rent; Discriminatory terms and conditions, privileges, or services and facilities	Withdrawn after Resolution

High Point	3/10/2017	Disability	Failure to make reasonable accommodation; Discriminatory terms, conditions, privileges, or services and facilities	No Cause Determination
High Point	5/8/2018	Race	Refusal to rent; Discriminatory terms and conditions, privileges, or services and facilities	Cause Determined
High Point	6/13/2018	Disability	Refusal to rent; Discriminatory terms and conditions, privileges, or services and facilities	Conciliation/ Settlement Successful
High Point	11/1/2018	Disability	Otherwise make housing unavailable; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory advertising, statements and notices	No Cause Determination

Source: North Carolina Human Relations Commission

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National Trends

The U.S. Department of Housing and Urban Development (HUD) funds the Office of Fair Housing and Equal Opportunity (FHEO), whose mission is to eliminate discrimination, promote economic opportunity, and achieve diversity. FHEO leads the nation in the enforcement, administration, development, and public understanding of Federal fair housing policies and laws. FHEO enforces laws that protect people from discrimination on the basis of race, color, religion, sex, national origin, disability, and familial status. FHEO releases annual reports to Congress, which provide information regarding complaints received during the particular year. The following table highlights the frequency of such housing complaints for the years of 2014, 2015, 2016, and 2017 organized by basis of complaint.

Table IV-A-6: HUD and FHAP Housing Complaints Nationwide

Basis	FY 2014		FY 2015		FY 2016		FY 2017	
	Number of Complaints	% of Total						
Disability	4,621	41%	4,605	42%	4,908	45%	4,865	59%
Race	2,383	21%	2,291	21%	2,154	20%	2,132	26%
Familial Status	1,051	9%	1,031	9%	882	8%	871	11%
National Origin	1,067	9%	898	8%	917	8%	834	10%
Sex	879	8%	915	8%	800	7%	826	10%
Religion	223	2%	225	2%	204	2%	800	10%
Color	146	1%	151	1%	143	1%	232	3%
Retaliation	867	8%	832	8%	785	7%	192	2%
Number of Complaints filed	11,237		10,948		10,793		8,186	

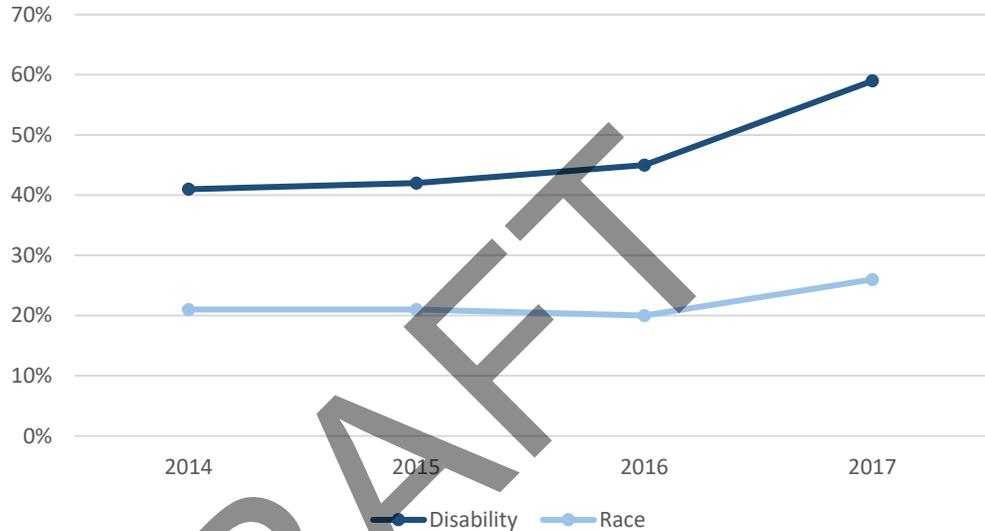
Source: HUD FY 2013-2017 Annual Reports on Fair Housing

Note: Complaints often allege more than one (1) basis of discrimination, and each base is counted as a separate complaint.

The majority of the HUD complaints filed nationwide in that four (4) years and specifically in 2017 were on the basis of disability, making up

59% of all complaints received that year. Race was next, making up 26% of all complaints, followed by familial status at 11%. As illustrated in the next chart, disability has become the most common basis of complaint, partially at the expense of racial complaints.

Figure IV-A-1: 4-Year Trends in Bases of Complaints



Source: HUD Enforcement Management Systems (HEMS), FY 2017 FHEO Annual Report

The HUD housing complaints filed in Guilford County were primarily based on disability and race, which are consistently the two most common causes for complaints across the nation as illustrated in the previous chart. Note: the percentages for each year do not equal 100% and the number of complaints each year do not equal the total complaints across all areas. This is because there is often more than one basis for the filing of a fair housing complaint.

4. Housing and Human Services Agencies

The City of High Point interviewed agencies offering housing and human services within the region to obtain their input and gain insight into potential impediments to fair housing. The following agencies participated in the information gathering through roundtable discussions, individual meetings, phone interviews, or through surveys:

- The Housing Authority of the City of High Point
- City of High Point Management Team
- City of High Point Fire Department
- City of High Point Police Department
- City of High Point Transportation
- City of High Point Economic Development Corporation
- City of High Point Planning & Development
- Guilford County Schools
- High Point Market Authority
- Guilford Technical Community College
- Welfare Reform Liaison Project
- City of High Point Human Relations Division
- City of High Point Realtors Association
- Partners Ending Homelessness
- Forward High Point
- Highland-Rankin-Ward Street Methodist Churches
- Tiny House Community Development
- Housing Consultants Group
- Triad Lifestyle
- Burns Hill Neighborhood Association
- Citizens Advisory Council
- High Point Museum Neighborhood
- Macedonia Neighborhood Association
- West End Neighborhood Association
- Mental Health Associates of the Triad
- Triad Adult Day Care
- Caring Services, Inc.
- Sandhills Center

Each of these agencies provided feedback on their experience with housing-related issues in the City of High Point. Complete summaries of meeting comments can be found in Appendix A. Below is a list of key points from each of the meetings.

Housing Issues

- There appears to be a lack of affordable housing that is decent, safe and sound in the City of High Point.

- There appears to be a lack of accessible housing in the City of High Point.
- Rental rates in the Core City of High Point are inflated and do not reflect the low quality of the supply of housing.
- Rehabilitation costs are inflated for properties in the Core City, leading to a degradation of housing supply for both renters and homeowners.
- Construction costs are high in the Core City. There are a number of vacant lots, but developers are unwilling to build affordable housing on these lots.
- There is a need to address housing with degraded quality throughout the City, although the Core City receives the most attention.
- The housing supply is decreasing around High Point University, leading to increased housing costs.
- There is a high demand for affordable housing for the elderly in the City.
- There have been instances of steering on the part of realtors, as well as “de facto redlining.” There is a need to affirmatively work to undo these policies and train realtors.
- The Comprehensive Housing Affordability Strategy (CHAS) data through HUD shows that 55.7% of all renters are cost overburdened in the City.
- Rental rates in the City have been rising while homeownership rates have been declining.
- NIMBYism is common, and affordable rental housing has been fought by neighborhood groups.
- The number of people evicted for domestic violence related issues has increased.

Social Services

- There are numerous social service programs available in the City.
- The homeless population in the area has become more visible, and there are many initiatives to serve this population, including the production of tiny homes for them.
- More social service programs are needed to assist the mentally ill, including people with addictions in the City, as problems have

become more complex over time while the amount of resources remains the same.

- Many social service programs assist the homeless, but there is a lack of affordable housing to rapidly rehouse the least complex cases for homeless individuals and families.
- There is a need for food security for many residents of the area. Though there are multiple feeding programs, they do not always reach all needy residents.
- With the reduction in Federal funds, there is a need for additional services to support the homeless population and those who are at risk of becoming homeless.
- Additional services are needed to assist the non-English speaking residents who are moving into the City.
- The local women's shelters are frequently at capacity.
- There are healthcare deserts in the City: there are neighborhoods where people do not have access to affordable care.
- There is a need for additional permanent supportive housing with wraparound services to assist the homeless population with mental health issues.
- Additional services are needed for youth who are coming out of foster care placement.
- Additional support services are needed for persons coming out of institutions including: hospitalization, correctional facilities, and mental healthcare in situations.

Public Policies

- The City of High Point recently adopted a complete rewrite of its zoning ordinance, which went into effect in 2017.
- High Point's zoning code began allowing for accessory dwelling units in 2019, which had constrained the supply of housing.
- There is a continuing need for education and training on tenant's rights and landlord's responsibilities under the Fair Housing Act.
- The zoning ordinance was recently changed to allow for single-room occupancy rentals in some districts to promote affordability.
- Lower appraisals of properties in neighborhoods of minority concentration lead to "de facto redlining" of these neighborhoods.
- North Carolina State Law requires group homes to be one mile away from each other. This is currently being adjudicated in court.

The zoning ordinance addresses this by using the definition “social service facility,” which has no distance requirements.

- There is a need to provide incentives to developers and businesses to create and develop affordable housing.

Transportation

- The City of High Point Transit System has limited hours. The Transit System has allocated funding to extend the hours, but is struggling to find drivers.
- There are no routes that directly connect the main cities of the region run by the City of High Point Transit System. Regional routes exist through Piedmont Area Regional Transportation (PART), which require traveling between local hubs.
- Ridership numbers for paratransit have been declining.
- There is a need for routes that connect residential areas to areas with high concentrations of jobs for low- and moderate-income residents.
- All buses have wheelchair lifts for accessibility purposes.
- The City’s Transportation Department has adopted a Complete Streets Policy and is working on principles and practices to improve road safety, and has added bike lanes and sidewalks in some neighborhoods.
- There is a need for multimodal transit that interconnects portions of the Core City together.

Economic Development

- There are multiple food deserts in the City of High Point that affect low- and moderate-income neighborhoods and areas of minority concentration.
- There are some commercial districts, such as Washington Street, that have a number of vacant store fronts.
- A wealth gap exists in the City, where low wage earners are trapped in a cycle of poverty.
- Job training programs are not always accessible to individuals without a car. Public transit is inadequate to attend these programs.
- There is a need to increase the diversity of those enrolled in job training programs.

- The Piedmont region has some high growth clusters, and there is a need to connect low income groups to these industries to increase earnings.

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B. Public Sector

Part of the Analysis of Impediments is to examine the public policies of the jurisdiction and the impact on fair housing choice. The Local governments control land use and development through their comprehensive plans, zoning ordinances, subdivision regulations, and other laws and ordinances passed by the local governing body. These regulations and ordinances govern the types of housing that may be constructed, the density of housing, and various residential uses in a community. Local officials determine the community’s commitment to housing goals and objectives. The local policies therefore determine if fair housing is to be promoted or passively tolerated.

This section of the Analysis of Impediments evaluates the City’s policies to determine if there is a commitment to affirmatively further fair housing.

1. CDBG Program

The City of High Point annually receives from HUD almost \$1,000,000 in CDBG funds. The City allocates its funds to housing construction, housing rehabilitation, public facilities, administration, and public services. This fiscal year the City will receive \$939,549 in CDBG funds.

In particular, the City proposed to allocate FY 2020 CDBG funds as outlined in the following table to affirmatively further fair housing.

Table IV-B-1: FY 2020 CDBG Allocation for the City of High Point, NC

Community Development Block Grant Program (CDBG)	
CDBG Administration	\$ 127,358.00
Housing Construction	\$ 415,745.00
Housing Rehabilitation	\$ 50,000.00
Affordable Housing Program Delivery	\$ 493,009.00
Community Capacity Building	\$ 191,825.00
Public Services	\$ 70,000.00
Section 108 Loan Repayment	\$ 104,357.00
Total:	\$ 1,552,294.00

The City anticipates receiving \$60,000.00 in Program Income and \$515,740.00 in a Section 108 Loan.

In its FY 2020-2024 Five Year Consolidated Plan, the City of High Point identified several goals to prioritize funding and address housing needs during this five-year period, as outlined in the following table:

Table IV-B-2: City of High Point, NC - Five Year Objectives

Housing Strategy – HSS
<i>Objective</i>
HNS-1 Increase Home Ownership – Promote, encourage and assist in developing opportunities for low- and moderate-income persons and families to become homeowners.
HNS-2 New Housing Development – Promote, encourage and assist in the financing and development of new affordable housing for both owner occupants and renter occupants including LIHTC funds, Housing Bond funds, and Section 108 Loan Guarantees.
HNS-3 Housing Rehabilitation – Provide funds and assist in the rehabilitation and improvement, including emergency repairs, of existing owner-occupied housing for low- and moderate-income household.
HNS-4 Fair Housing Choice – Affirmatively further fair housing by advocating, enforcing and educating residents, realtors, landlords, managers, and local officials on fair housing choice.
HNS-5 Housing Education – Provide training and educational programs to assist low- and moderate-income homebuyers and tenants in the best practices for the purchase and maintenance of housing, including the prevention of foreclosure and eviction.
HNS-6 CHDO Capacity Building – Support the capacity development of Community Housing Development Organizations (CHDOs).
Homeless Strategy – HMS
<i>Objective</i>
HMS-1 Housing for the Homeless – Promote and assist in the development of permanent housing opportunities for persons and families experiencing homelessness and those who are at risk of becoming homeless.
HMS-2 Operations and Support – Promote and assist organizations that provide supportive services and operate facilities and programs for persons and families experiencing homelessness, and those who are at risk of becoming homeless.
HMS-3 Transitional and Shelter Housing – Support and assist organizations that provide temporary housing and operations for persons

and families experiencing homelessness, and those who are at risk of becoming homeless.
HMS-4 Prevention of Homelessness – Promote and assist in programs to prevent unfair evictions, unfair housing practices and domestic violence which may contribute to homelessness.
Community Development Strategy – CDS
<i>Objective</i>
CDS-1 Build Community Capacity – Support, promote and provide technical assistance to neighborhood organizations serving the residents of low- and moderate-income areas of the City of High Point.
CDS-2 Neighborhood Improvements – Work in conjunction with neighborhood organizations and City Staff to clean-up, and visually improve low- and moderate-income neighborhoods in the City, including the removal of blight, and demolition of vacant, dilapidated and abandoned structures throughout the City to promote the stabilization of neighborhoods.
CDS-3 Public Transportation – Promote the expansion of routes, travel schedules, and improvement of the local bus service in the City.
CDS-4 Public Services – Improve, increase and support public services and programs for the youth, the elderly, developmentally delayed, disabled, of low- and moderate-income population, including housing, job training, educational, nutritional, advocacy, etc.
Special Needs Strategy – SNS
<i>Objective</i>
SNS-1 Housing – Promote, assist and support the development of affordable housing opportunities for persons with special needs in the community.
SNS-2 Support Services – Promote and support social and support services for the elderly, persons with disabilities, the developmentally delayed, persons with HIV, and other persons and their families with special needs.
SNS-3 Accessibility – Promote and support the elimination of architectural barriers, reasonable accommodations in rental properties, homeowner accessibility improvements, etc.
Economic Development Strategy – EDS
<i>Objective</i>
EDS-1 Job Creation and Employment – Promote, support and encourage new job creation, job retention, employment, and job training services for low- and moderate-income persons and families.
EDS-2 Financial Assistance – Support business retention, expansion, creation, and start-up of new businesses and commercial operations,

including small businesses, minority business enterprises, women-owned businesses, and socially or economically restricted businesses through low interest loans, Section 108 Loans, and financial incentives.

Administration, Planning & Management Strategy – APM

Objective

APM-1 General Administration – Continue to support the management staff who provide oversight for compliance with Federal, State and local programs.

APM-2 Planning – Promote and prepare plans for special studies, applications for funds, environmental reports, NRSA plans, Section 108 Loan Applications, Choice Neighborhood Initiative grants, etc.

APM-3 CHDO Capacity Building – Support the capacity development of Community Housing Development Organizations (CHDOs).

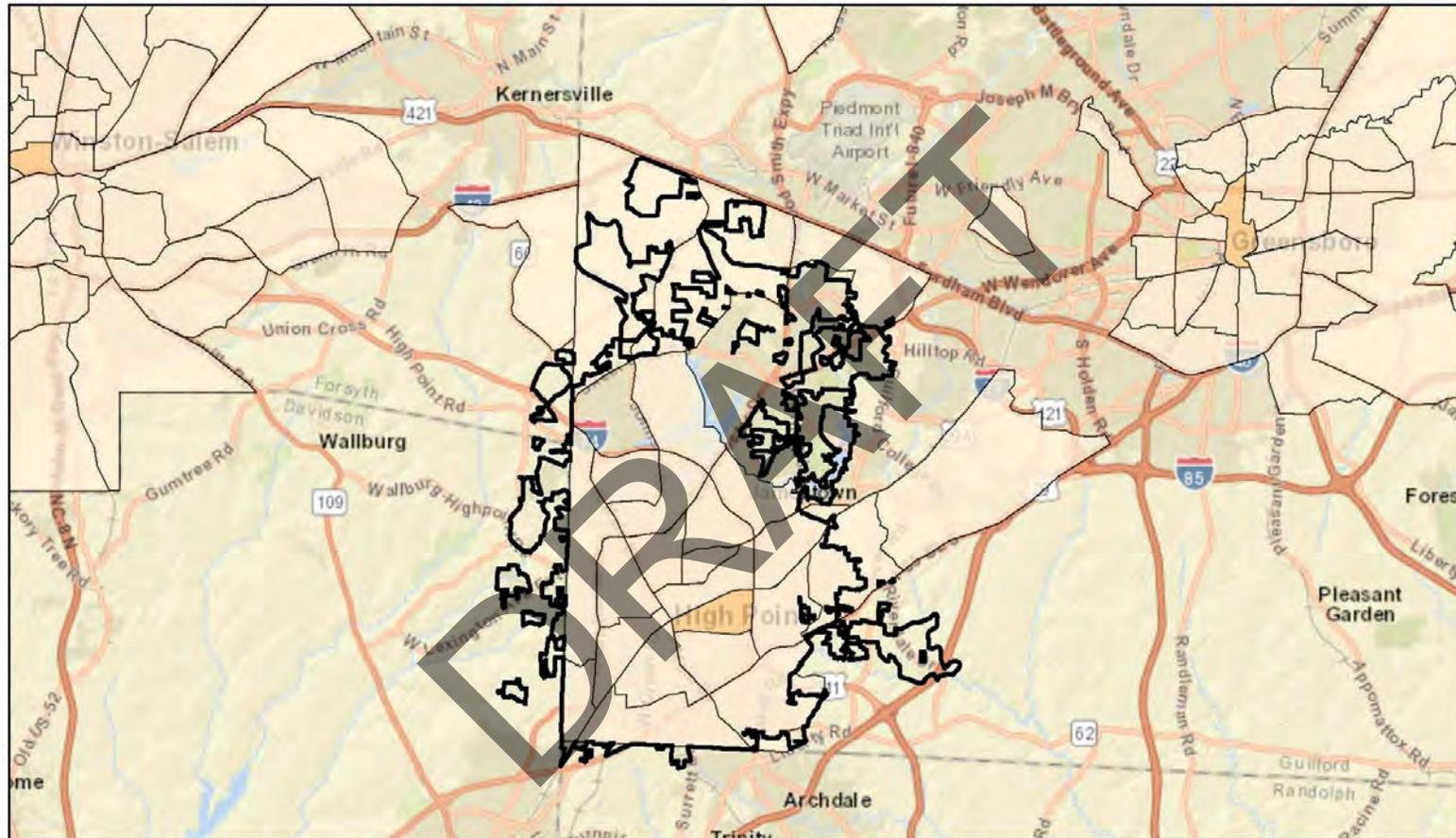
The following attached maps illustrate the locations of CDBG funded activities in the City of High Point:

- **Map IV-B-1: CDBG Activities Funding**
- **Map IV-B-2: CDBG All Activities**

Map IV-B-2: CDBG All Activities shows activities by type of activity funded between 2009 and 2019. Public service activities take place throughout the City, and are not confined to low- and moderate-income areas. Other activities largely occur in the Core City, which is a low- and moderate-income area.

Map IV-B-1

CDBG Funding - City of High Point, NC



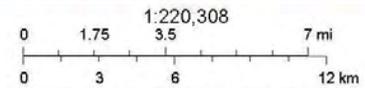
February 10, 2020

Override 1 CDBGActivitiesFunding

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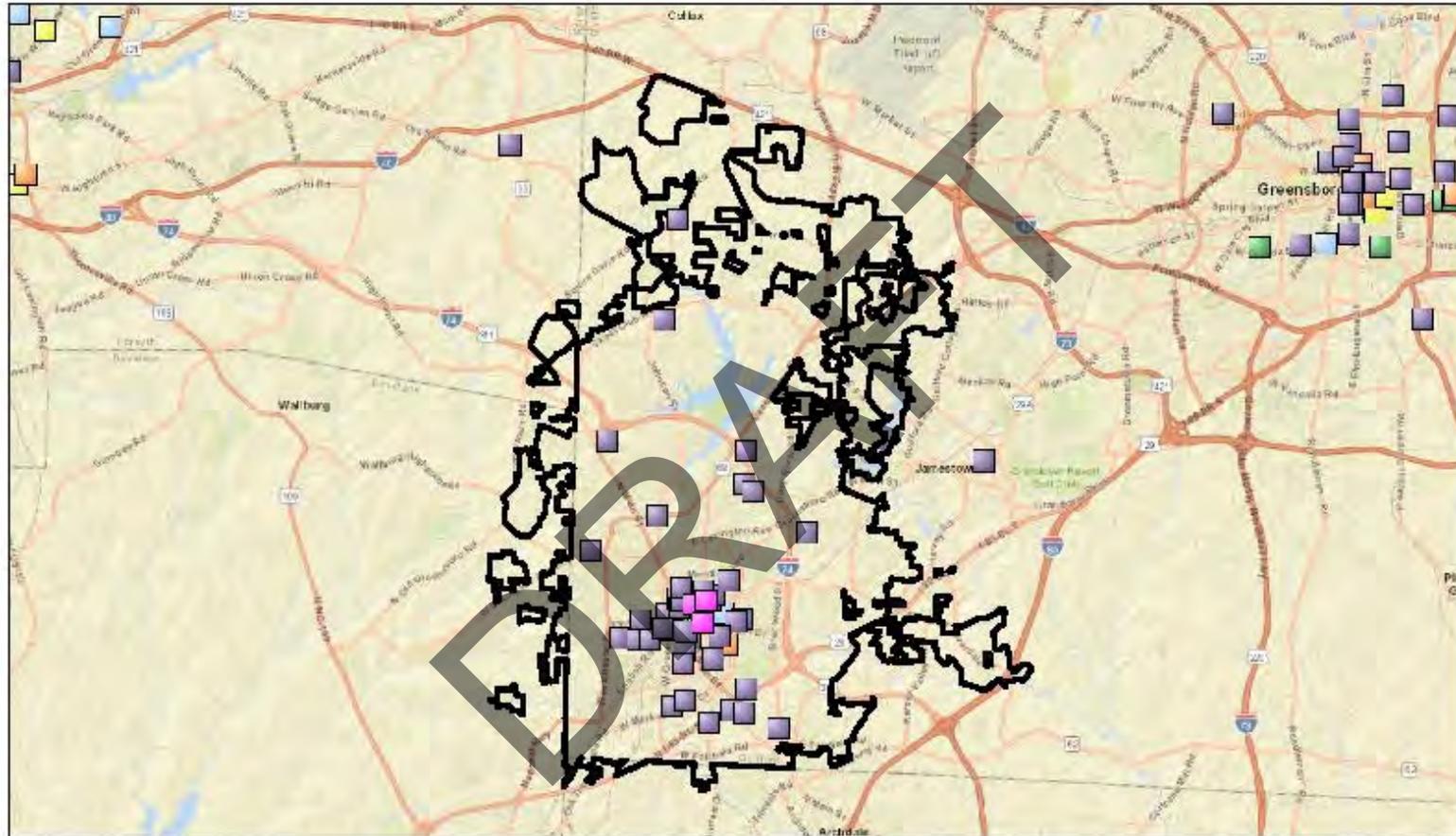
\$6,101,360.17-\$32,511,133.38



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

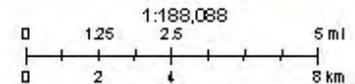
Map IV-B-2

CDBG All Activities - City of High Point, NC



May 11, 2020

- Year 2009 - 2020
 Year 2009 - 2020
 Override 1
- Year 2009 - 2020
 Year 2009 - 2020
- Year 2009 - 2020
 Year 2009 - 2020



Source: Esri, HERE, Garmin, USGS, Imagery, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Ireland), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

2. HOME Investment Partnership (HOME) Program

The City of High Point was allocated from HUD \$544,069 in HOME funds. The City allocates its funds to new construction and tenant-based rental assistance.

In particular, the City proposes to allocate FY 2020 HOME funds as outlined in the following table to affirmatively further fair housing.

Table IV-B-3: FY 2020 HOME Allocation for the City of High Point, NC

HOME Investment Partnership (HOME) Program	
HOME Administration	\$ 65,947.00
New Construction – Affordable Housing	\$ 184,255.00
Homebuyer Assistance & IDA Match	\$ 100,000.00
CHDO Activities	\$ 314,267.00
Total:	\$ 664,469.00

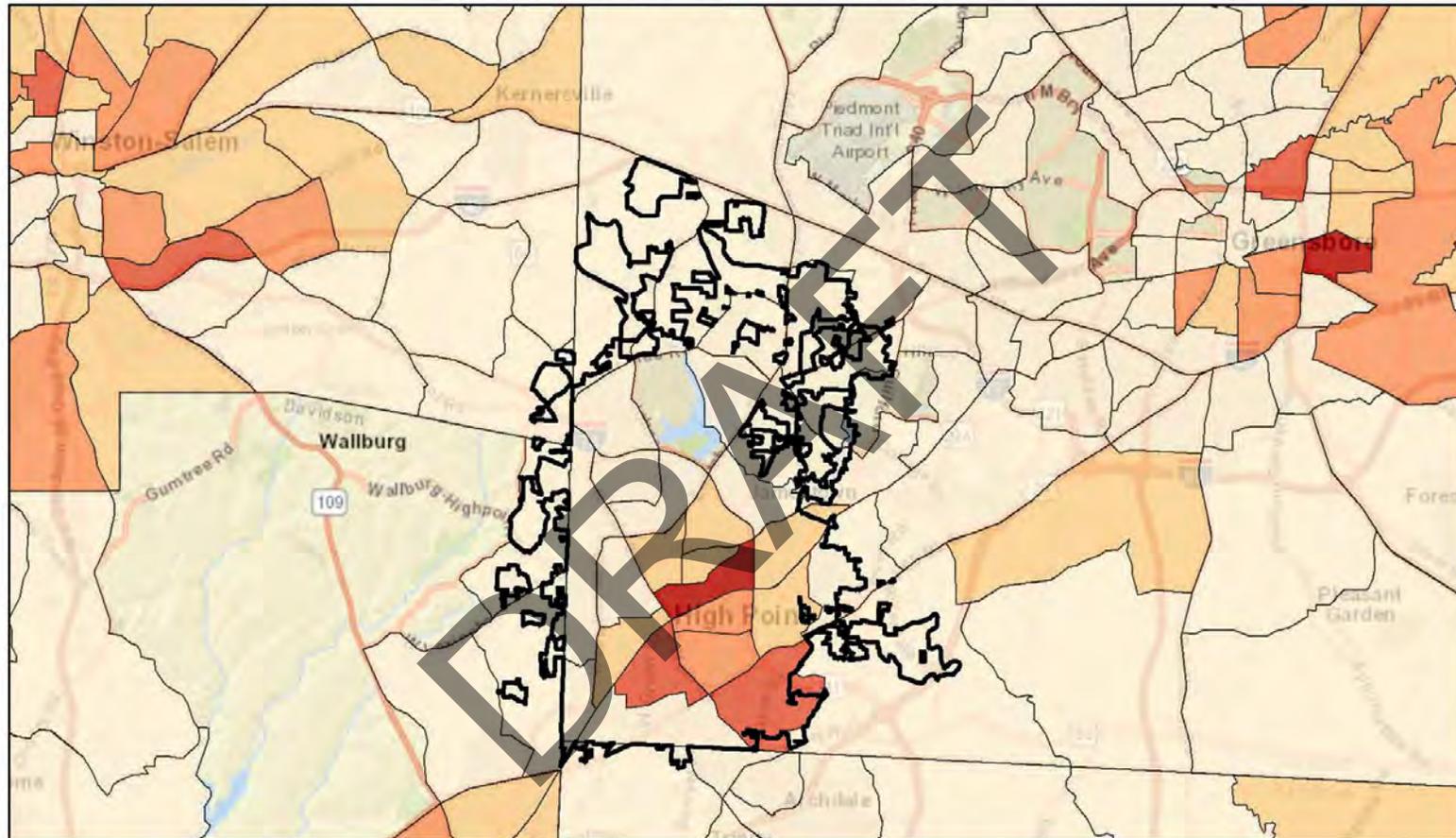
The City anticipates receiving \$115,400.00 in Program Income.

The following attached map illustrate the locations of HOME funded activities in the City of High Point:



Map IV-B-3

HOME Funding - City of High Point, NC



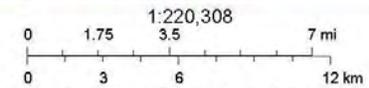
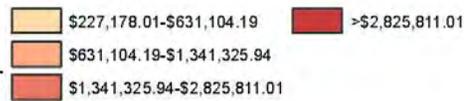
February 10, 2020

Override 1

HOMEActivitiesFunding

CPDMAPSO_IDIS_ACTV_HOME_TRACT_TOTAL_AMT

\$0-\$227,178.01



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

3. Continuum of Care (CoC)

The Guilford County Continuum of Care addresses homelessness throughout all of Guilford County. The Continuum of Care is composed of a variety of stakeholders including churches, advocates, emergency shelters and other nonprofits, affordable healthcare providers, employment training programs, The Housing Authority of the City of High Point, and the City of High Point, in addition to similar organizations within the City of Greensboro and other agencies in Guilford County.

Partners Ending Homelessness is the collaborative applicant and HMIS and Coordinated Entry lead for the Guilford County Continuum of Care. Partners Ending Homelessness has recently become the lead for the Coordinated Entry strategy to conduct intake and referrals for homeless persons and persons at risk of homelessness within Guilford County. During the intake process, a person is evaluated with the VI-SPDAT, scored and ranked in terms of services needed, and referred to an available bed with relevant support services. The CoC is targeting the chronically homeless, veterans, and homeless youth, the latter of which is being addressed through a recently formed Youth Homelessness Advocacy Committee.

4. The Housing Authority of the City of High Point –

The Housing Authority of the City of High Point (HPHA) is the primary provider of affordable housing in the City of High Point. It runs programs for both public housing and Section 8 Housing Choice Voucher Holders. HPHA is an integral partner for Low-Income Housing Tax Credit (LIHTC) developments. The Authority has placed voucher holders in LIHTC developments, and will be completing Phase II and Phase III of a LIHTC development to replace the Daniel Brooks Homes and Daniel Brooks Annex public housing communities.

**The Housing Authority of the
City of High Point**
500 E Russell Ave
High Point, NC 27260
(336) 887-2661
<http://www.hpha.net>

The Housing Authority of the City of High Point is recognized as a public body corporate and is a “Public Housing Authority” funded by the U.S. Department of Housing and Urban Development and the State of North Carolina. The Housing Authority is considered a “standard performer” by HUD and its everyday operations are handled by an Chief Executive Officer.

The Housing Authority of the City of High Point’s mission is to provide eligible families and individuals with adequate and affordable housing, economic advancement, and homeownership opportunities — in a safe, drug-free, suitable, living environment — without discrimination.

The Housing Authority of the City of High Point owns and professionally manages fifteen (15) family communities and three-hundred and fifty-seven (357) elderly/disabled rental apartments. Within these communities are a total of 1,146 public housing units. HPHA is currently in the process of demolishing the Daniel Brooks units, which is composed of three (3) different AMP units. There are 216 units in the core Daniel Brooks complex, along with 28 units in the Daniel Brooks Annex. The Housing Authority will replace these units with 264 tax credit units in a three-phase development across multiple sites.

The waiting list for public housing is currently open. The breakdown of the waiting list is 56.9% one-person households, 29.4% two-person households, 11.8% three-person households, 1.6% four-person households, and 0.3% five-person or greater households, as of December 11, 2019 (the last waiting list available).

HPHA has a Family Self-Sufficiency program which utilizes escrow accounts to purchase a home, as well as a first-time homebuyer program. HPHA serves as a certified HUD counseling agency for pre- and post-home purchase. HPHA also has an Upward Mobility where PHA residents can pay for their own utilities, and excess charges will no longer go back to tenants if they go over the consumption allowance.

The Housing Authority of the City of High Point administers 1,519 Section 8 Housing Choice Vouchers as of December 11, 2019, as well as an additional 321 vouchers that they will be receiving for the replacement of the Daniel Brooks units. There are currently 831

households on the Section 8 Housing Choice Voucher waiting list. The waiting list for Section 8 Housing Choice Vouchers is currently closed. The breakdown of the waiting list is 29.4% one-person households, 37.2% two-person households, 25.8% three-person households, 6.3% four-person households, and 1.4% five-person or greater households, as of December 11, 2019 (the last waiting list available). Section 8 Housing is currently at 98% occupancy.

HPHA takes an active role in ensuring the needs of its residents are met. Community resident councils have the opportunity to meet with the Executive Director every quarter at a director's roundtable. This ensures that the Executive Director is aware of the most pressing issues for community residents.

Public Housing –

The Housing Authority of the City of High Point (HPHA) aims to address the needs of the extremely low-income, very low-income, and low-income residents of the City of High Point.

HUD provides funding to The Housing Authority of the City of High Point through its Capital Improvement Program and Housing Choice Voucher Program. HPHA owns and manages 1,146 public housing units. Three hundred fifty-seven (357) of these units are elderly housing in Hillside Manor. Additionally, HPHA administers a Family Self Sufficiency Program that offers families an opportunity to participate in a program that provides them opportunity to work with a caseworker to develop a plan to gain access to education and job programs, administers a first-time homebuyer program, and an upward mobility program.

Table IV-B-4: The Housing Authority of the City of High Point – Public Housing

Community	Owner/Manager	Units
Astor Dowdy Towers	The Housing Authority of the City of High Point	106
Beamon Courts	The Housing Authority of the City of High Point	22
Carson Stout Homes	The Housing Authority of the City of High Point	116
Daniel Brooks Annex	The Housing Authority of the City of High Point	28
Daniel Brooks Homes	The Housing Authority of the City of High Point	216
Deep River Homes	The Housing Authority of the City of High Point	31
Elm Towers	The Housing Authority of the City of High Point	150
J.C. Morgan Courts	The Housing Authority of the City of High Point	94
Juanita Hills	The Housing Authority of the City of High Point	140
Morehead Court	The Housing Authority of the City of High Point	101
Scattered Site Development	The Housing Authority of the City of High Point	79
Upward Mobility	The Housing Authority of the City of High Point	60

Source: The Housing Authority of the City of High Point

The following table provides the racial data of the typical applicant for housing assistance from HPHA’s Affirmative Marketing Plan.

Table IV-B-5: The Housing Authority of the City of High Point Demographics and Marketing Area

Demographic Characteristics	Project’s Residents	Project’s Applicant Data	Census Tract	Housing Market Area	Expanded Housing Market Area
White	36%	9.9%	139.00	High Point, NC	Guilford County, NC
Black or African American	64%	81.3%	139.00	High Point, NC	Guilford County, NC

Hispanic or Latino	.02%	6.2%	139.00	High Point, NC	Guilford County, NC
Asian	.04%	1.9%	139.00	High Point, NC	Guilford County, NC
American Indian or Alaskan Native	0%	0.7%	139.00	High Point, NC	Guilford County, NC
Native Hawaiian or Pacific Islander	0%	0%	139.00	High Point, NC	Guilford County, NC
Other	46%	0%	139.00	High Point, NC	Guilford County, NC
Persons with Disabilities	54%	32.9%	139.00	High Point, NC	Guilford County, NC
Families with Children under the age of 18	0%	0%	139.00	High Point, NC	Guilford County, NC

Source: The Housing Authority of the City of High Point Affirmative Marketing Plan

Section 8 –

The Housing Authority of the City of High Point oversees the Section 8 Housing Choice Voucher Program. Eligible participants who receive vouchers may search on their own for privately owned housing. The Housing Authority encourages voucher holders to locate in areas of high opportunity and outside of areas with racial and ethnic concentrations of poverty. The Housing Authority of the City of High Point grants extensions to Voucher Holders to assist them in finding housing that passes the Section 8 inspection. The Section 8 Housing Choice Voucher utilization rate is currently 98%.

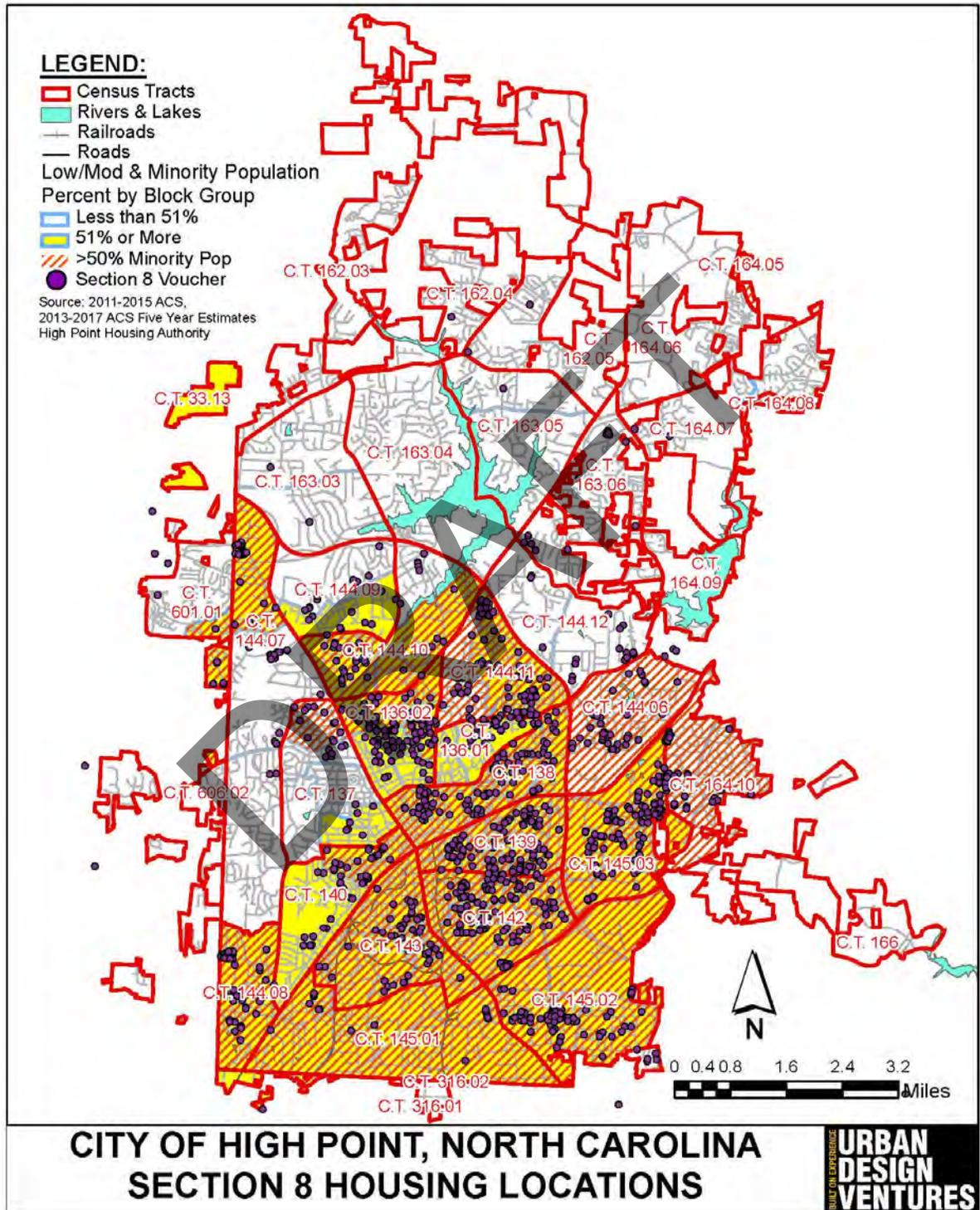
Additionally, Family Self-Sufficiency (FSS) programs are provided to Section 8 Housing Choice Voucher holders and public housing tenants. FSS program partners residents with a case manager to develop goals that will, over a five (5) year period, lead to self-sufficiency. These goals may include education, specialized training, job readiness, job placement activities, and career advancement objectives. The goals for each participating family member are set out in the Individual’s Training and Service Plan. HPHA has a baseline of 1,519 Section 8 Housing Choice Vouchers, and will be receiving an additional 321 vouchers with the creation of new rental units.

The Housing Authority of the City of High Point affirmatively markets its housing to all eligible income groups. Lower income residents will not be steered toward lower income developments and higher income people will not be steered toward higher income developments.

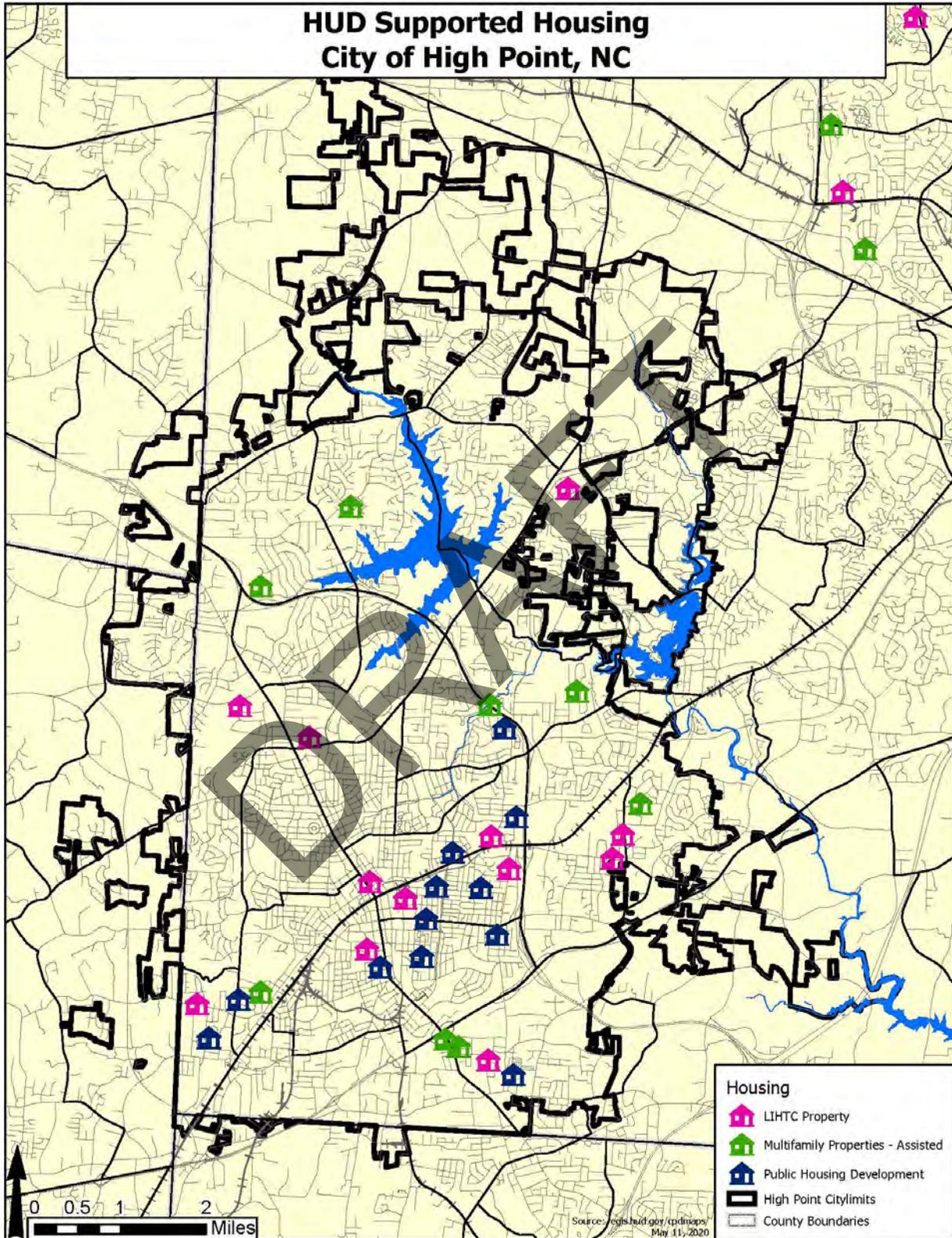
The following map shows the locations of Section 8 Housing Choice Voucher holders in the City of High Point:

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Map IV-B-4



Map IV-B-5



4. Additional Housing Authority Programs –

The Housing Authority of the City of High Point (HPHA) aims to address the needs of the extremely low-income, very low-income, and low-income residents of the City of High Point. This was done through HPHA assisting individuals and families through its public housing communities and Section 8 Project-Based units and the Housing Choice Vouchers. The Housing Authority promotes homeownership through its Family Self-Sufficiency Program.

Family Self-Sufficiency (FSS) programs are provided to Housing Choice Voucher holders and public housing tenants to transition from welfare to work or better paying jobs. The Head of Household works with the FSS staff to create a five-year plan, which lists steps they will take to pursue economic stability for their family. The plan includes goals to seek and maintain employment and become free of any welfare (cash) assistance. Throughout the program, FSS staff helps families access government and community programs and services for financial aid, career training, job search, childcare, transportation, counseling, budgeting, credit repair, and even homeownership.

As the family progresses in their program, any rent increases caused by increases in salary, better jobs, or wages are deposited in an FSS savings account. At the end of five years, when the Head of Household completes their FSS goals and “graduates,” they are eligible to receive money collected in this account. Past participants in FSS have returned to school, obtained living wage jobs, improved credit and finances, purchased vehicles, started businesses, and bought homes of their choice. Their futures become more secure as they build assets.

HPHA also runs an Upward Mobility program that assists tenants in self-sufficiency and prepares them for housing situations outside of Housing Authority properties. In response to people with financial means that wanted to stay in Housing Authority communities, HPHA started the Upward Mobility Program, in which residents move to another subsidized community, but pay their own utilities. This allows tenants to build self-sufficiency, while avoiding the over-consumption charges that are passed on to Public Housing residents.

HPHA is a HUD-certified housing counseling agency and provides pre- and post-homeownership counseling to all residents of the City. HPHA runs a first-time homebuyer program. Participants are assisted with budgeting and credit repair as needed, provided with homeownership education, and given support every step of the way as they purchase their home.

5. Low Income Housing Tax Credit –

The Low-Income Housing Tax Credit (LIHTC) Program was created under the Tax Reform Act of 1986 and is intended to attract private investment to develop affordable rental housing for low- and moderate-income households. This program provides a dollar-for-dollar tax credit to reduce the developer’s Federal income tax. The City of High Point promotes the use of Low Income Housing Tax Credits. The following table shows LIHTC projects completed in the City of High Point since 2000.

Table IV-B-6: The City of High Point, NC LIHTC Projects

Project Name / HUD ID Number	Project Address	Project City	Project ZIP Code	Total Number of Units	Total Low-Income Units
Kirkwood Crossing NCA0000X040	2208 Kirkwood Street	High Point	NC	27262	84
Park Terrace III NCA0000X052	885 Sharon Street	High Point	NC	27260	78
Franklin Ridge Apts NCA20000095	213 W Hartley Dr	High Point	NC	27265	48
Spring Brook Meadows NCA20030175	2732 Granville St	High Point	NC	27263	44
Brentwood Crossing NCA20040035	308D Brentwood St	High Point	NC	27260	136
Lake Road Apartments NCA20060135	308 Taylor Avenue	High Point	NC	27260	99
Spring Valley Apartments NCA20080180	509 East Commerce Avenue	High Point	NC	27260	79
The Oaks at Silver Ridge NCA20110095	2900 E Kivett Drive	High Point	NC	27260	100
Sheraton Towers NCA20110137	400 North Main Street	High Point	NC	27260	97
Park Terrace Apartments Phase II NCA20110581	885 Sharon Street	High Point	NC	27260-7699	92
Park Terrace NCA20114028	885 Sharon Street	High Point	NC	27260-7699	80

Admiral Pointe NCA20120804	3725 Admiral Drive	High Point	NC	27268	54
Addington Ridge NCA20150039	3726 Admiral Drive	High Point	NC	27265	58

Source: <http://lihtc.huduser.org/>

6. HUD Assisted Housing –

HUD has limited funding under the Section 202 and Section 811 Supportive Housing programs to encourage and support the development of assisted housing in cities and counties across the country. The Section 202 Supportive Housing for the Elderly Program provides financial support for the construction, rehabilitation, or acquisition of supportive housing for the elderly. Similarly, the Section 811 Supportive Housing for the Disabled provides financial assistance for nonprofit organizations seeking to develop affordable, supportive housing for low-income adults with disabilities. The City of High Point is supportive of the use of Section 202 and Section 811 Supporting Housing Programs, as well as the use of Low Income Housing Tax Credits (LIHTC).

7. Social Service Agencies –

The following table lists the organizations for the at risk, homeless, or disabled populations in the City of High Point.

Table IV-B-7: Supportive Service Programs

Agency Name	Description
The ARC of High Point	The ARC advocates for, and provides programs and services for individuals with cognitive and intellectual impairments. Programs include dental care, job training, and social programs.
Caring Services, Inc.	Caring Services provides long-term recovery care for people that have experienced addictions to drugs and alcohol. Caring Services provides transitional housing and programs targeted to veterans.
FaithHealth	FaithHealth operates out of High Point Medical Center to recruit volunteers that support people who are receiving treatment from the medical center.
The Foundation for a Healthy High Point	The Foundation for a Healthy High Point offers competitive grant funding to organizations undertaking initiatives to improve health outcomes in the City of High Point. The

	Foundation is currently targeting programs for grants that are working on projects associated with teen pregnancy prevention and early intervention, and behavioral health.
Greater High Point Food Alliance	Greater High Point Food Alliance seeks to alleviate food insecurity issues in the City of High Point. The Alliance seeks both to advocate for food security in food deserts in the City, and to provide a food security fund that residents can utilize when facing food insecurity.
Guilford County Family Justice Center	The Guilford County Family Justice Center is a collaborative of 12 organizations in one location. Clients at the center seek assistance with domestic violence, human trafficking, elder abuse, and other family justice issues.
Highland-Rankin-Ward Street Methodist Churches	These three Methodist churches have been working with homeless populations in the area, and are in the process of working to build a new shelter and care for people in cold weather events, along with providing food security.
Housing Consultants Group	Housing Consultants Group provides pre- and post-home purchase counseling for first-time homebuyers where below area median income. They provide a variety of services to homebuyers, and are in the process of becoming a CHDO.
Mental Health Associates of the Triad	Mental Health Associates of the Triad provides outpatient services, including group therapy, substance abuse assistance, and a psychological rehabilitation day program for severely and persistently mentally ill adults, called Destiny House.
Operation Xcel	Operation Xcel serves area students with after school programs, ranging from basic literacy and homework assistance to enrichment programs.
Partners Ending Homelessness	Partners Ending Homelessness is the lead entity of the Greensboro-High Point-Guilford County CoC. PEH coordinates placement of homeless individuals and families into appropriate housing and social service programs.
Piedmont Health Services & Sickle Cell Agency	Piedmont Health Services & Sickle Cell Agency provides wraparound services to individuals with Sickle Cell Disease. They also provide services for the families of individuals with the disease, and also conduct outreach for HIV/AIDS.
Roy B. Culler Senior Center	The Roy B. Culler Senior Center acts as a site for Senior Resources of Guilford County. The Senior Center provides programming and daily activities for seniors.
Sandhills Center	Sandhills Center provides public mental health care to individuals with mental health issues, intellectual/developmental disabilities, and substance abuse disorders. Sandhills uses Medicaid State Funds to provide services and train local providers in caring for their clients. Sandhills

	partners with many of the other social service providers in the area that may need mental health assistance for their clients.
Senior Resources of Guilford County	Senior Resources of Guilford County provides a continuum of services for independent living for older adults. These programs include nutrition programs and Meals on Wheels, as well as an “Adopt a Grandparent” program and medical transportation.
Tiny House Community Development	Tiny House Community Development creates tiny house communities of 3-10 tiny homes for individuals experiencing homelessness. They utilize volunteer labor and encourage tiny house residents to be active in community gardens, playgrounds, and other community building activities.
Triad Adult Day Care Center, Inc.	Triad Adult Day Care provides two apartment sites in the City of High Point that operate a variety of activities for the developmentally disabled. On-site, Triad Adult Day Care provides social services, including physical and education services.
Triad Health Project	Triad Health Project provides case management, food, and other assistance to individuals with HIV/AIDS in the cities of Greensboro and High Point. They provide confidential testing and assist individuals with HIV/AIDS in finding housing.
United Way of Greater High Point	United Way offers all youth head start programs in the area, including programs for both children and parents. United Way of Greater High Point (UWGHP) funds a backpack program for school students in the area to provide nutritious, kid-friendly, pre-packaged foods at pickup sties in the City and surrounding areas. UWGHP’s children’s initiatives includes an early childhood “Success by 6” program, public engagement campaigns to turn everyday activities into learning opportunities, early care scholarships, training courses for parents, and book exchange programs operated through “Little Free Libraries” distributed across the City.
Welfare Reform Liaison Project	Welfare Reform Liaison Project is a community action agency that offers free job training for low-income Guilford County residents. Programs are available in construction and media careers.
YWCA of High Point	The YWCA of High Point operates a variety of programs in the City of High Point. The YWCA advocates for social justice, and operates programs for healthy children, adolescent parenting, women’s resources, and youth services. The YWCA of High Point is the location of the City’s Latino Family Center.

8. Planning and Zoning

The City of High Point rewrote its Zoning Ordinance in 2016 and it was put into effect in 2017. Major changes to the previous zoning ordinance to affirmatively further fair housing include changing the definition of family and allowing for Single Room Occupancy buildings by-right in the two higher density multi-family zones, Transitional Office, and Office and Institutional Districts. Dense, multi-family development is also included in the zoning ordinance within the Core City, and the ordinance also provides for some tiny home development within the Core City.

There is a history of NIMBYism exhibited by residents in planning and zoning meetings, including withdrawals of applications for projects for a Low-Income Housing Tax Credit project in North High Point. This withdrawal was not against the zoning ordinance that was in place for the chosen site, but was withdrawn due to resident pressure.

The City of High Point does not have distance requirements for Social Service Facilities, which includes homeless shelters and shelters for victims of domestic violence, nor for Assisted Living Facilities. However, there is no definition of “Disabled” in the City of High Point’s Zoning Ordinance. Nor does the zoning ordinance contain a statement that the City affirmatively furthers fair housing.

Because the State of North Carolina allows for distance requirements between group homes, the City of High Point has a distance requirement for Family Care Homes of 2,640 feet away from existing Family Care Homes. Family Care Homes are a form of housing for people with some type of disability. Though this is prohibited by the Fair Housing Act, the State of North Carolina allows for these distance requirements. This matter is currently being adjudicated in Federal Court. The City of High Point has created a separate definition for “Social Service Facilities” to overcome this barrier, and homes with these designations do not have associated distance requirements.

U.S. Department of Housing and Urban Development (HUD)

HUD encourages its grantees to incorporate “visitability” principles into their designs. Housing that is “visitable” has the most basic level of accessibility that enables persons with disabilities to visit the home of a friend, family member, or neighbor. “Visitable” homes have at least one accessible means of egress/ingress for each unit, and all interior and bathroom doorways have 32-inch clear openings. At a minimum, HUD grantees are required to abide by all Federal Laws governing accessibility for disabled persons.

Federal Requirements

Federal laws governing accessibility requirements include Section 504 of the Rehabilitation Act, the Americans with Disabilities Act, and the Fair Housing Act.

Section 504 of the Rehabilitation Act (24 CFR Part 8), known as “*Section 504*” prohibits discrimination against persons with disabilities in any program receiving Federal funds. Specifically, Section 504 concerns the design and construction of housing to ensure that a portion of all housing developed with Federal funds is accessible to those with mobility, visual, and/or hearing impairments.

The Americans with Disabilities Act [42 U.S.C. 12131; 47 U.S.C. 155, 201, 218, and 225] (ADA) prohibits discrimination against persons with disabilities in all programs and activities sponsored by state and local governments. Specifically, ADA gives HUD jurisdiction over housing discrimination against persons with disabilities.

The Fair Housing Act was amended in 1988 to include persons with disabilities as a protected class, as well as to include design and construction requirements for housing developed with private or public funds. Specifically, this law requires property owners to make reasonable accommodations to units and/or public areas in order to allow a disabled tenant to make full use of the housing unit. Additionally, property owners are required to make reasonable accommodations to rules or procedures to afford a disabled tenant full use of the unit. As it relates to local zoning ordinances, the Fair Housing Act prohibits local government from making zoning or land

use decisions, or implementing land use policies that exclude or discriminate against persons of a protected class.

9. Taxes

Real estate property taxes may also impact housing affordability. This may not be an impediment to fair housing choice, but it does impact the affordability of housing.

The following table shows the millage rates for the jurisdictions in Guilford County.

**Table IV-B-8: Guilford County
Property Taxes - 2019**

	Tax Rate
Guilford County	.7305
Archdale	.2900
Burlington	.5973
Gibsonville	.5300
Greensboro	.6625
High Point	.6475
Jamestown	.4680
Kernersville	.5700
Oak Ridge	.0800
Pleasant Garden	.0500
Sedalia	.2750
Stokesdale	.0000
Summerfield	.0275
Whitset	.0155

Source: Guilford County Office of Assessment

Though the majority of the City of High Point lies in Guilford County, there are portions of the City in Randolph County, Forsyth County, and Davidson County. The City of High Point has a .6475 tax rate in all four (4) counties, but county rates vary as follows:

	Guilford County	Davidson County	Forsyth County	Randolph County
Tax Millage Rate	.7305	.5400	.7535	.6327

A variety of tax relief options are available to residents of Guilford County. Programs can be found at <https://www.quilfordcountync.gov/our-county/tax/property-tax-relief-programs>.

10. Transportation

Transportation plays an important aspect in determining where residents choose to live. Some families choose to live in an area that is more private than physically connected, while others place more emphasis on proximity to main arteries and highways for commuting to work.

City of High Point Transit System

The City of High Point Transit System serves the City of High Point, NC with 13 fixed routes and an additional express circulator, known as PART. The Transit System also runs a paratransit. All public transit is provided in the form of buses.

Based on stakeholder meetings, public transit is one of the greatest needs in the community. The greatest public transit needs in the area were increased route frequency into later hours, additional bus drivers to drive those routes, routes that connect residential areas to job centers, and transit that operates outside of the City of High Point with services in Greensboro and Winston-Salem.

The City of High Point Transit System has allocated the funding to expand bus service to the hours of 5:45 AM to 6:30 PM on Monday through Friday, and 8:45 AM to 5:15 PM on Saturday. However, the Transit System has had difficulty finding drivers for the bus route

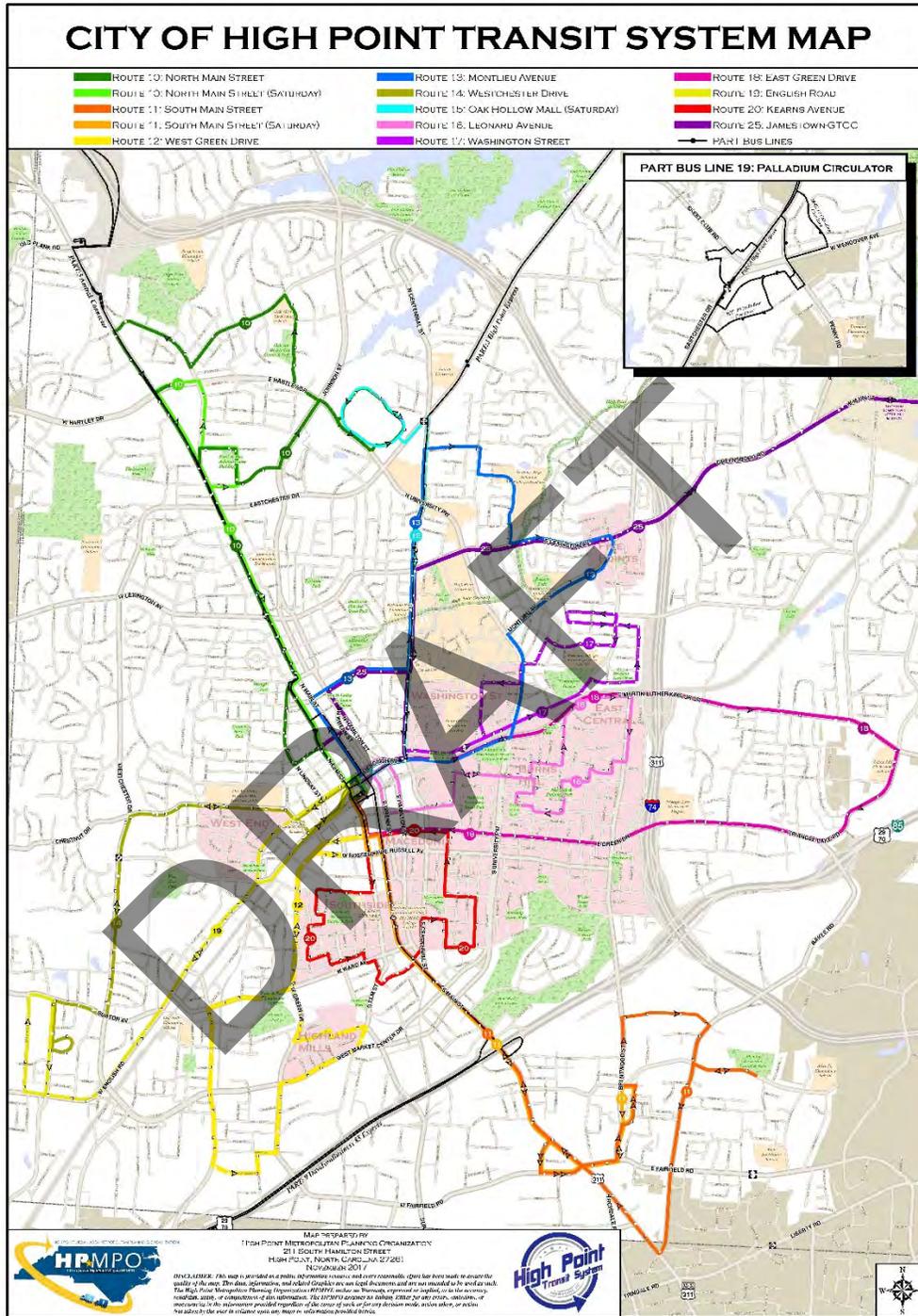
expansion. The Transit System struggles to pay a competitive wage to potential drivers with a Commercial Drivers License and to potential maintenance staff. For this reason, the expansion of hours does not yet have a set date. Though routes do not cover every neighborhood, the hours of operation are more frequently cited as a complaint about the public transit system.

Paratransit ridership has been declining for the Transit System.

The fixed route map for City of High Point Transit System is shown below:

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Map IV-B-6



Source: City of High Point Transit System

All City of High Point buses are equipped with bike racks and handicap lifts.

11. Jobs and Workforce Development

Access to good employment affects housing choice. However, there can be disparities in access to good jobs. The City of High Point has acknowledged these disparities and has partnered with local organizations to provide employment training. Stakeholders in the region have largely identified that low wages in the area contribute to poverty, and a service-oriented economy provides residents who are living in poverty with little upward mobility. Organizations and programs are in place to develop the City's workforce, with an emphasis on diversity, including:

- Guilford Technical Community College (GTCC) works with approximately 6,000 students per year, and provides job training for low-income students. The Community College has specifically been targeting small-scale manufacturing, such as upholstery, and carpentry as areas of need, and has been guiding adults toward internships in these positions. There are successful apprenticeship programs in these fields for youth. Other programs that the GTCC runs are quick career programs, where they cover gaps for underemployed people. GTCC also targets working with veterans that need workforce training assistance.
- The Southwest Renewal Foundation of the Core City is collaborating on an initiative to assist small manufacturing businesses and provide them with warehouse space that remains vacant in that part of the City.
- Forward High Point works on economic development in Downtown High Point. The Market Authority has worked to bring a Minor League Baseball Stadium to High Point, and is encouraging development and the associated job growth in the commercial corridor near that space.
- High Point Economic Development Corporation has worked to recruit large employers to the City and the region.

12. Education

Education is often an important factor influencing the opportunities for where people choose to live. Greensboro, High



Point, and Guilford County comprise Guilford County Schools. Guilford County schools are composed of 125 schools with 75,000 students. Generational poverty impacts the school system and creates certain schools with reputations as “good” or “bad” and drives investment or disinvestment in certain neighborhoods.

To ensure North Carolina schools are performing well, the State uses the North Carolina School Report Card system, which is an online platform released annually in the Fall that provides district and building level academic scores to all schools. Additionally, the Report Card Site informs the public of the academic performance measures of each school and provides local teachers, administrators, and parents an opportunity to compare the performance of local schools.

Of the 125 schools in the Guilford County School District in the 2018-2019 school year: 12 schools received an A (10.1%), 29 received a B (24.4%), 37 received a C (31.1%), 36 received a D (30.3%), and 5 schools received an F (4.2%). A total of 26 schools exceeded their growth goals (22.2%), 60 schools met their growth goals (51.3%), and 31 schools failed to meet their growth goals (26.5%).

The North Carolina Report Card system tracks performance among subgroups of students for grades 3-8. Levels 1 and 2 are considered below grade level, Level 3 is considered at grade level, and Levels 4 and 5 are considered above grade level. When taking these statistics into account, it is important to note that the Guilford County School District has a large homeless population and a large foster care population. Additionally, the population that speaks English as a second language has been growing, and the District provides ESL for refugee populations. Guilford County’s School proficiency data is shown below:

Table IV-B-9: Guilford County Schools Math Proficiency Grades 3-5

Math Performance	Not Proficient	Level 3	Level 4	Level 5
Other	42%	18%	33%	19%
ALL	48%	17%	25%	11%
Female	46%	18%	26%	11%

Male	49%	17%	24%	11%
American Indian	57%	15%	23%	5%
Asian	30%	14%	31%	26%
Black	63%	17%	16%	<5%
Hispanic	53%	19%	22%	6%
Two or More Races	45%	17%	26%	12%
White	26%	17%	36%	21%
Academically/Intellectually Gifted	6%	11%	45%	39%
Economically Disadvantaged	62%	17%	17%	<5%
English Learners	68%	15%	14%	<5%
Foster Care	75%	17%	7%	<5%
Homeless	76%	14%	9%	<5%
Military Connected	38%	22%	26%	14%
Students w/ Disabilities	82%	9%	7%	<5%

Source: NC Department of Public Instruction

Table IV-B-10: Guilford County Schools English Language Arts Proficiency

English Language Arts/Reading Performance	Level 1	Level 2	Level 3	Level 4	Level 5
Other	20%	19%	14%	42%	17%
ALL	26%	18%	13%	33%	10%
Female	22%	19%	13%	35%	11%
Male	30%	18%	12%	31%	9%
American Indian	34%	20%	19%	22%	6%
Asian	18%	16%	11%	38%	17%
Black	36%	22%	13%	25%	<5%
Hispanic	32%	21%	14%	28%	<5%
Two or More Races	21%	16%	14%	36%	12%
White	11%	12%	12%	46%	20%
Academically/Intellectually Gifted	<5%	<5%	6%	54%	36%
Economically Disadvantaged	37%	22%	13%	25%	<5%
English Learners	57%	20%	10%	12%	<5%
Foster Care	42%	28%	14%	13%	<5%
Homeless	50%	21%	12%	16%	<5%
Military Connected	15%	22%	8%	41%	14%
Students w/ Disabilities	63%	18%	7%	10%	<5%

Source: NC Department of Public Instruction

Additionally, the North Carolina Report Card system tracks suspensions and expulsions by subgroup. Guilford County's suspension and expulsion data is shown below:

Table IV-B-11: Guilford County Schools Suspensions and Expulsions

Suspensions and Expulsions (per 1000 Students in Subgroup)	Short-Term Suspensions	Long-Term Suspensions	Expulsions	In-School Suspensions
ALL	95.09	0.03	0.00	64.93
Female	58.11	0.00	0.00	41.45
Male	125.32	0.05	0.00	83.90
American Indian	81.85	0.00	0.00	121.00
Asian	17.02	0.00	0.00	15.58
Black	163.35	0.03	0.00	102.49
Hispanic	53.32	0.08	0.00	43.14
Pacific Islander	99.01	0.00	0.00	99.01
Two or More Races	109.94	0.00	0.00	67.11
White	34.52	0.00	0.00	31.18
Economically Disadvantaged	136.07	0.03	0.00	87.85
English Learners	40.43	0.00	0.00	32.98
Students w/ Disabilities	188.81	0.10	0.00	104.78

Source: NC Department of Public Instruction

The graduation rate for Guilford County schools for last year was 89%. In conjunction, the dropout rate increased to 11%.

13. Section 3

HUD’s definition of Section 3 is:

Section 3 is a provision of the Housing and Urban Development Act of 1968. The purpose of Section 3 to ensure that employment and other economic opportunities generated by certain HUD financial assistance shall, to the greatest extent feasible, and consistent with existing Federal, State and local laws and regulations, be directed to low- and very low income persons, particularly those who are recipients of government assistance for housing, and to business concerns which provide economic opportunities to low- and very low-income persons.

The following are the guidelines that the City of High Point’s Department of Community Development and Housing uses to accomplish Section 3 compliance:

- Requiring contractors and subcontractors who receive Section 3 covered funds to direct efforts towards contracting with Section 3 business concerns.
- Requiring contractors to submit a Section 3 Action Plan.
- Providing contractors with a list of Section 3 business concerns interested in and qualified for construction projects through the Section 3 Coordinator.
- Utilizing the Section 3 Coordinator to review the new hire clause of contractors and subcontractors.
- Advertising contracting opportunities that provide general information about the work to be contracted and where to obtain additional information.
- Provide written or electronic notice of contracting opportunities to all known Section 3 business concerns.
- Conduct workshops on contracting procedures in a timely manner to allow Section 3 business concerns to take advantage of opportunities.
- Contact business assistance agencies, Minority and Women's Business Enterprises (M/WBE) contractor Associations, and community organizations to inform them of contracting opportunities.
- Establish relationships with the Small Business Administration (SBA), M/WBE association, Community Development Organizations, and other agencies to educate and assist residents that would like to start their own business.
- Seek out referral sources in order to ensure job readiness for Section 3-qualified residents through on-the-job-training and mentoring to obtain necessary skills.

During the preparation of this Analysis of Impediments study, no impediments or complaints were mentioned or filed based on the HUD Section 3 Requirements.

C. Private Sector

Nationally, the private sector has traditionally been the greatest impediment to fair housing choice in regard to discrimination in the sale, rental, or advertising of housings, the provision of brokerage services, or in the availability of financing for real estate purchases. The Fair Housing Act and local laws prohibits such practices as the failure to give the same terms, privileges, or information; charging different fees; steering prospective buyers or renters toward a certain area or neighborhood; or using advertising that discourages prospective buyers or renters because of race, color, religion, sex, handicap, familial status, national origin, and sexual orientation.



1. Real Estate Practices

The High Point Regional Association of Realtors (HPRAR) is a trade association that represents real estate professionals throughout the High Point Region. HPRAR works in four counties and represents 500 real estate agents that specialize in both commercial and residential real estate.

As a requirement for membership in the National Association of Realtors (NAR), all members must complete a mandatory ethics training and abide by the National Association of Realtor’s Code of Ethics.

Article 10 of the NAR Code of Ethics states that Realtors *“shall not deny equal professional services to any person for reasons of race, color, religion, sex, handicap, familial status, national origin, sexual orientation, or gender identity. REALTORS® shall not be parties to any plan or agreement to discriminate against a person or persons on the basis of race, color, religion, sex, handicap, familial status, national origin, or gender identity.”*



<https://www.nar.realtor/sites/default/files/documents/2019-COE.pdf>)

HPRAR ensures that new members are exposed to Fair Housing Training. However, there is a greater need for continuing education for Fair Housing. The REALTORS Code of Ethics Training for the maintenance of memberships is a periodic, hourly requirement, which is often inadequate.

Regardless of the amount of training required for membership in the association of realtors, realtors can still use code words. Focus groups have reported instances of realtors steering renters and homebuyers.

2. Newspaper/Magazine Advertising

Under Federal Law, no advertisement with respect to the sale or rental of a dwelling unit may indicate any preference, limitation, or discrimination because of race, color, religion, sex, handicap, familial status, or national origin. Under the Fair Housing Act as amended, descriptions are listed in regard to the use of words, photographs, symbols, or other approaches that are considered discriminatory.

Real estate advertisements were reviewed from several real estate publications, including *The High Point Enterprise*. None of the advertisements in these publications contained language that prohibited occupancy by any protected class.

3. Private Financing

The Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (F.I.R.R.E.A.) requires any commercial institution that makes five (5) or more home mortgage loans, to report all home loan activity to the Federal Reserve Bank under the Home Mortgage Disclosure Act (HMDA). The annual HMDA data can be found online at www.ffiec.gov/hmda/ and is included in Part VII, Appendix C of this Analysis of Impediments. This analysis uses 2018 HMDA data to identify any discriminatory lending patterns between minority and non-minority households. The following two (2) tables provide an analysis of the HMDA data in the Greensboro-High Point, NC Metropolitan Statistical Area (MSA).

The following table compares lending in Guilford County to the Greensboro-High Point, NC MSA. Lending in Guilford County has been extracted from the MSA data based on census tract. Conventional loans in Guilford County comprised 74.3% of the number of such loans in the MSA as a whole and 82.7% of the value of such loans.

Table IV-C-1: HMDA Data Analysis for 2018

	Home Purchase Loans							
	FHA, FSA / RHS & VA		Conventional		Refinancing		Home Improvement Loans	
	#	\$ Amount*	#	\$ Amount*	#	\$ Amount*	#	\$ Amount*
Guilford County	3,360	490,500	16,476	2,915,160	3,512	564,260	1,662	150,360
MSA/MD	4,833	672,445	22,168	3,524,190	5,141	746,825	2,248	179,330
% of metro area lending in Guilford County	69.5%	72.9%	74.3%	82.7%	68.3%	75.6%	73.9%	84.0%

*Note: Amounts in thousands
Source: <https://www.ffiec.gov/hmda/>

The following table shows the conventional loan applications in Guilford County. 15,276 of the MSA's 20,663 mortgage applications came from Guilford County, which is 73.9% of all applications. More than half (62.1%) of the loan applications in the County were originated, while nearly a fifth (19.7%) were denied. County applicants had a slightly higher origination rate than the MSA as a whole, which comprised 62.1% of all loans originated, as well as 19.7% of denied applications.

Table IV-C-2: Disposition of Conventional Loans

	Guilford County		
	Count	% of Guilford County Applications	% of Total MSA Applications
Loans Originated	9,485	62.1%	61.3%
Approved, Not Accepted	410	2.7%	2.6%

Applications Denied	3,011	19.7%	20.8%
Applications Withdrawn	1,822	11.9%	11.6%
File Closed for Incompleteness	548	3.6%	3.6%

Source: <https://www.ffiec.gov/hmda/>

DRAFT

The following table outlines the disposition of conventional loans in Guilford County by income level (data for only the City of High Point is not available). Loan applications from low-income households have the highest denial rates by a large margin, while upper-income households have the lowest denial rates and highest origination rates. The percentage of loans originated and percentage of applications denied are both correlated with income, whereas the higher the income level, the more likely the application will be approved and loan originated.

Table IV-C-3: Disposition of Conventional Loans by Income Level in Guilford County, NC – 2018

Income Level	Applications Received		Loans Originated		Applications Approved, Not Accepted		Applications Denied		Applications Withdrawn		Files Closed for Incompleteness	
	Count	% of Total	Count	% of Total Income Level	Count	% of Total Income Level	Count	% of Total Income Level	Count	% of Total Income Level	Count	% of Total Income Level
Less than 50% of MSA Median	812	5.5%	270	33.3%	19	2.3%	366	45.1%	110	13.5%	47	5.8%
50-79% of MSA Median	1,905	12.9%	1,022	58.7%	13	2.4%	240	28.9%	76	11.2%	23	3.8%
80-99% of MSA Median	1,608	10.9%	944	58.7%	33	2.1%	362	22.5%	211	13.1%	58	3.6%
100-119% of MSA Median	1,393	9.5%	872	39.1%	40	2.2%	274	41.5%	152	13.1%	55	4.0%
120% or More of MSA Median	9,022	61.2%	5,984	62.6%	262	2.9%	1,370	19.7%	1,094	10.9%	312	3.9%
Total	14,470	100.0%	9,092	61.7%	399	2.7%	2,923	19.8%	1,781	12.1%	545	3.7%

Source: <https://www.ffiec.gov/hmda/>

The following tables show the disposition of conventional loans where the race of the applicant was reported, disaggregated by minority status and income level for Guilford County. The number of applications for conventional loans submitted by White applicants outnumbers minority applicants in each income level analyzed. Asian applicants have the highest origination rate 50% below median income. Black or African American applicants have a disproportionately high denial rate at this level, as do Hispanics or Latinos applicants.

Table IV-C-4: Loan Disposition Rates by Minority Status, Less than 50% of County Median Income

Race/Ethnicity	Applications Received	% of Total Applications	Loans Originated	% of Received Applications by Minority Status	Applications Approved but Not Accepted	% of Received Applications by Minority Status	Applications Denied	% of Received Applications by Minority Status	Applications Withdrawn	% of Received Applications by Minority Status	Applications Closed for Incompleteness	% of Received Applications by Minority Status
American Indian or Alaska Native	8	1.1%	1	12.5%	1	12.5%	5	62.5%	1	1.25%	0	0.0%
Asian	85	12.1%	44	51.8%	1	1.2%	25	29.4%	12	14.1%	3	3.5%
Black or African American	174	24.8%	33	19.0%	3	1.7%	109	62.6%	21	12.1%	8	4.6%
Native Hawaiian or Other Pacific Islander	3	0.4%	2	66.7%	0	0.0%	1	33.3%	0	0.0%	0	0.0%
White	431	61.5%	168	39.0%	14	3.2%	168	39.0%	51	11.8%	30	7.0%
Hispanic or Latino	65	9.2%	28	43.1%	2	3.1%	26	40.0%	4	6.2%	5	7.7%
Not Hispanic or Latino	644	90.8%	223	34.6%	17	2.6%	288	44.7%	81	12.6%	35	5.4%
Total	701	100.00%	248	35.4%	19	2.7%	307	43.8%	86	12.3%	41	5.8%

Source: <https://www.ffiec.gov/hmda/>

In this income category, Black or African Americans have a higher denial rate than their application rate, as do Hispanic or Latino applicants. Asian applicants have a high origination rate at 61.3% of applicants.

Table IV-C-5: Loan Disposition Rates by Minority Status, 50-79% of County Median Income

Race/Ethnicity	Applications Received	% of Total Applications	Loans Originated	% of Received Applications by Minority Status	Applications Approved but Not Accepted	% of Received Applications by Minority Status	Applications Denied	% of Received Applications by Minority Status	Applications Withdrawn	% of Received Applications by Minority Status	Applications Closed for Incompleteness	% of Received Applications by Minority Status
American Indian or Alaska Native	4	2.3%	3	75.0%	0	0.0%	0	0.0%	1	25.0%	0	0.0%
Asian	155	9.1%	95	61.3%	3	1.9%	32	20.6%	17	11.0%	8	5.2%
Black or African American	473	27.7%	203	42.9%	11	2.3%	177	37.4%	58	12.3%	24	5.1%
Native Hawaiian or Other Pacific Islander	8	4.7%	4	50.0%	0	0.0%	2	25.0%	2	25.0%	0	0.0%
White	1,067	62.5%	630	59.0%	26	2.4%	268	25.1%	108	10.1%	35	3.3%
Hispanic or Latino	176	10.3%	106	60.2%	2	1.1%	50	28.4%	13	7.4%	5	2.8%
Not Hispanic or Latino	1,530	89.7%	828	54.1%	37	2.4%	431	28.2%	173	11.3%	61	4.0%
Total	1,707	100.00%	935	54.8%	40	2.3%	479	28.1%	186	10.9%	67	3.9%

Source: <https://www.ffiec.gov/hmda/>

The number of White, Non-Hispanic applicants, in this income category is higher than other applicant types. White, Non-Hispanic applicants have a higher origination rate than their population rate. Black or African American residents have a denial rate comparable to their application rate at this income level.

Table IV-C-6: Loan Disposition Rates by Minority Status, 80-99% of County Median Income

Race/Ethnicity	Applications Received	% of Total Applications	Loans Originated	% of Received Applications by Minority Status	Applications Approved but Not Accepted	% of Received Applications by Minority Status	Applications Denied	% of Received Applications by Minority Status	Applications Withdrawn	% of Received Applications by Minority Status	Applications Closed for Incompleteness	% of Received Applications by Minority Status
American Indian or Alaska Native	3	0.2%	1	33.3%	0	0.0%	1	3.3%	1	3.3%	0	0.0%
Asian	94	6.6%	55	58.5%	0	0.0%	28	29.8%	10	10.6%	1	1.1%
Black or African American	367	25.8%	187	51.0%	15	4.1%	104	28.3%	48	13.1%	13	3.5%
Native Hawaiian or Other Pacific Islander	4	0.2%	1	25.0%	1	25.0%	2	50.0%	0	0.0%	0	0.0%
White	955	67.1%	603	63.1%	12	1.3%	182	19.1%	127	13.3%	31	3.2%
Hispanic or Latino	104	7.2%	60	57.7%	2	1.9%	24	23.1%	16	15.4%	2	1.9%
Not Hispanic or Latino	1,332	92.8%	801	60.1%	29	2.2%	290	21.8%	170	12.8%	44	3.2%
Total	1,423	100.00%	847	59.5%	28	2.0%	317	22.3%	186	13.1%	45	3.2%

Source: <https://www.ffiec.gov/hmda/>

At this income level, all minority groups with more than ten applications have a higher denial rate than origination rate. Origination rates for Asian applicants are lower at these levels, though higher for Black or African American applicants.

Table-IV-C-7: Loan Disposition Rates by Minority Status, 100-119% of County Median Income

Race/Ethnicity	Applications Received	% of Total Applications	Loans Originated	% of Received Applications by Minority Status	Applications Approved but Not Accepted	% of Received Applications by Minority Status	Applications Denied	% of Received Applications by Minority Status	Applications Withdrawn	% of Received Applications by Minority Status	Applications Closed for Incompleteness	% of Received Applications by Minority Status
American Indian or Alaska Native	2	0.2%	2	100%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Asian	67	5.5%	32	47.8%	2	3.0%	21	31.3%	8	11.9%	4	3.0%
Black or African American	302	24.6%	165	54.6%	8	2.6%	88	29.1%	32	10.6%	9	3.0%
Native Hawaiian or Other Pacific Islander	3	0.2%	1	33.3%	0	0.0%	1	33.3%	0	0.0%	1	33.3%
White	855	69.6%	582	68.1%	25	2.9%	133	15.6%	91	10.6%	24	2.8%
Hispanic or Latino	77	6.3%	48	62.3%	4	5.2%	15	19.5%	8	10.4%	2	2.6%
Not Hispanic or Latino	1,144	93.7%	730	63.8%	34	3.0%	220	19.2%	123	10.8%	37	3.2%
Total	1,229	100.00%	782	63.6%	35	2.8%	243	19.8%	131	10.7%	38	3.1%

Source: <https://www.ffiec.gov/hmda/>

In the table below, the number of White, non-Hispanic upper-income applicants significantly outnumbers the number of minority applicants. Of the racial/ethnic groups with more than 10 applicants in this income category, Black or African American and Asian applicants have a lower origination rate and a higher denial rate to white applicants, as well as higher denial rates.

Table IV-C-8: Loan Disposition Rates by Minority Status, 120% or More of County Median Income

Race/Ethnicity	Applications Received	% of Total Applications	Loans Originated	% of Received Applications by Minority Status	Applications Approved but Not Accepted	% of Received Applications by Minority Status	Applications Denied	% of Received Applications by Minority Status	Applications Withdrawn	% of Received Applications by Minority Status	Applications Closed for Incompleteness	% of Received Applications by Minority Status
American Indian or Alaska Native	14	1.8%	8	57.1%	0	0.0%	3	21.4%	3	21.4%	0	0.0%
Asian	420	5.4%	254	60.4%	23	5.5%	58	13.8%	65	15.5%	20	4.8%
Black or African American	1,188	15.4%	657	55.3%	35	2.9%	285	24.0%	161	13.6%	50	4.2%
Native Hawaiian or Other Pacific Islander	7	0.1%	4	57.1%	0	0.0%	3	42.9%	0	0.0%	0	0.0%
White	6,082	78.9%	4,228	69.5%	171	2.8%	815	13.4%	694	11.4%	174	2.9%
Hispanic or Latino	251	3.2%	153	61.0%	6	2.4%	51	20.3%	31	12.4%	10	4.0%
Not Hispanic or Latino	7,502	96.8%	5,036	67.1%	226	3.0%	1,108	14.8%	899	12.0%	233	3.1%
Total	7,711	100.00%	5,151	66.8%	229	3.0%	1,164	15.1%	923	12.0%	244	3.2%

Source: <https://www.ffiec.gov/hmda/>

The following offers a closer look at the denial rates of conventional loans based on reason and income level. For applicants earning up to 99% of median income, the most common reason for denial is debt-to-income ratio, followed by credit history and/or collateral. Overall, the most common reason for denial of conventional loans in the Guilford County, NC is credit history (32.99%), followed by debt-to-income ratio (28.31%) and collateral (14.06%).

Table IV-C-9: Conventional Loan Denial Rates by Denial Reason and Income Level

	Less than 50% Low		50-79% Middle		80-99% Upper- Middle		100-119% Upper		120% or More High		Income Not Available		Total Denials	
	Count	% of Income Level	Count	% of Income Level	Count	% of Income Level	Count	% of Income Level	Count	% of Income Level	Count	% of Income Level	Count	% of Total
Debt- to-Income Ratio	190	52.20%	200	36.56%	109	30.19%	77	28.31%	247	18.12%	25	28.41%	848	28.31%
Employment History	5	1.37%	7	1.28%	3	0.83%	3	1.10%	11	0.81%	1	1.14%	30	1.00%
Credit History	107	29.40%	186	34.00%	118	32.69%	100	36.76%	456	33.46%	21	23.86%	988	32.99%
Collateral	11	3.02%	49	8.96%	47	13.02%	34	12.50%	267	19.59%	13	14.77%	421	14.06%
Insufficient Cash	10	2.75%	16	2.93%	12	3.32%	9	3.31%	73	5.36%	2	2.27%	122	4.07%
Unverifiable Information	7	1.92%	22	4.02%	11	3.05%	14	5.15%	58	4.26%	6	6.82%	118	3.94%
Credit Application Incomplete	9	2.47%	35	6.54%	32	8.86%	18	6.62%	123	9.02%	9	10.23%	226	7.55%
Mortgage Insurance Denied	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%	0	0.00%
Other	25	6.87%	32	5.85%	29	8.03%	17	6.25%	128	9.39%	11	12.5%	242	8.08%
Total Denials and % of Total	364	12.15%	547	18.26%	361	12.05%	272	9.08%	1,363	45.51%	88	2.94%	2,995	100.00%

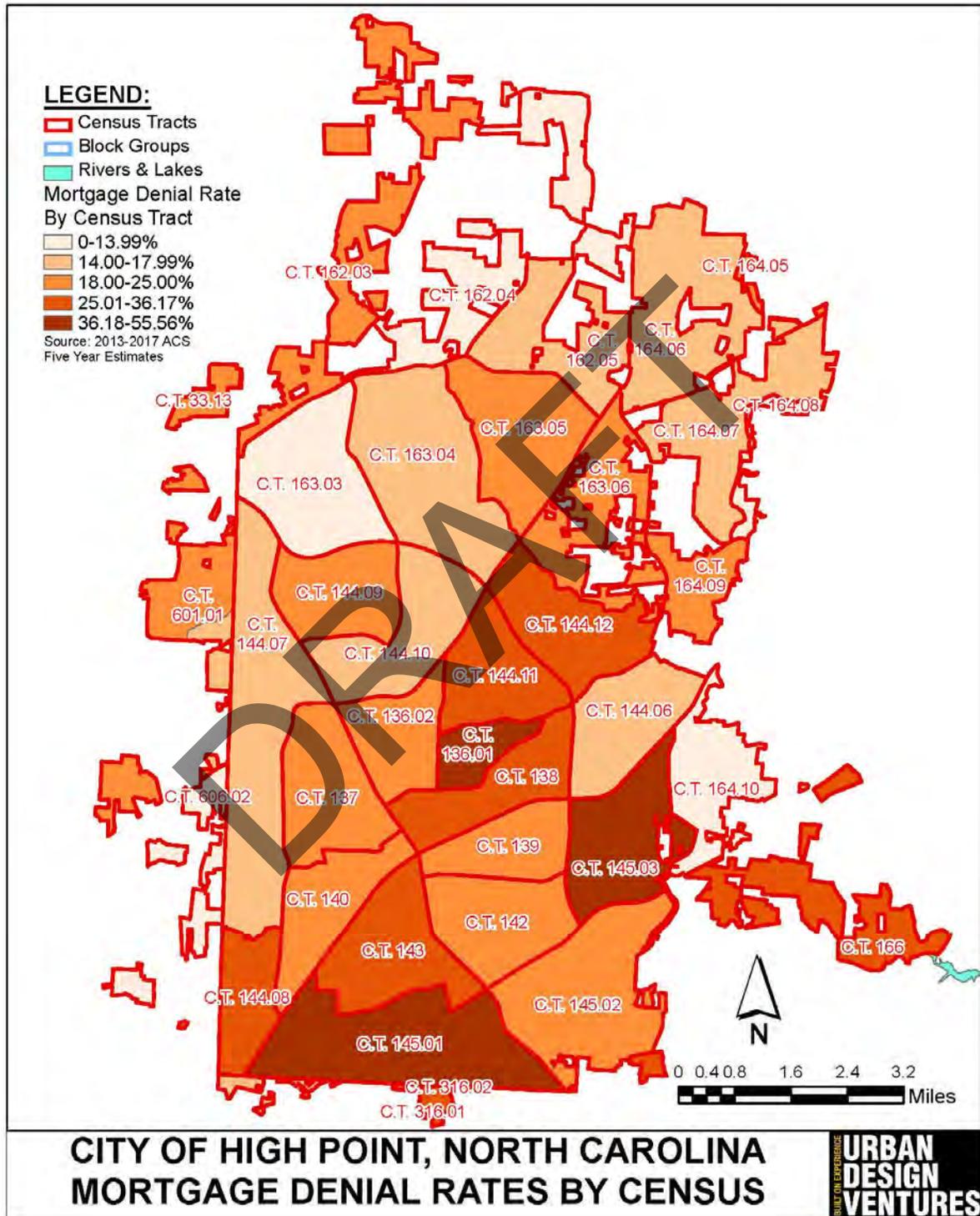
Source: <https://www.ffiec.gov/hmda/>

In summary, the HMDA data shows that more than half (62.1%) of conventional loan applications in Guilford County were originated, slightly less than a quarter (19.7%) were denied. County applicants had a slightly lower origination rate than that of the MSA, where 61.3% were originated and 20.8% were denied. The following map shows all Census Tracts where mortgage applications were received in the City of High Point, and the rates at which those applications were denied. A review of the map indicates higher denial rates correlate with lower incomes, and the Core City stands out as an area of concentrated higher denial rates.

When cross-referenced to the Low- and Moderate-income and minority population map of the City (Map II-C-2), two of the three census tracts with the highest percentages of denied mortgage applications are also minority-majority census tracts (C.T. 145.01 and C.T. 145.03). The third Census Tract, C.T. 136.01, has a low- and moderate-income percent of 72.7%, but it is not a majority-minority Census Tract.

Unfortunately, the HMDA data could not be broken down by only the City of High Point. The County statistics are skewed because they include the City of Greensboro which is another Federal Entitlement City, and the County Seat of Government.

Map IV-C-1



Additionally, the origination rates are higher and denial rates lower for ‘White’ applicants than for ‘Black or African American’ in every income category. As incomes decrease, denial rates increase, often due to these applicants being first-time homebuyers with little to no collateral, poor credit history, and debt. While denial rates decrease as income increases, minorities have higher denial rates than “Whites” within the same income groups.

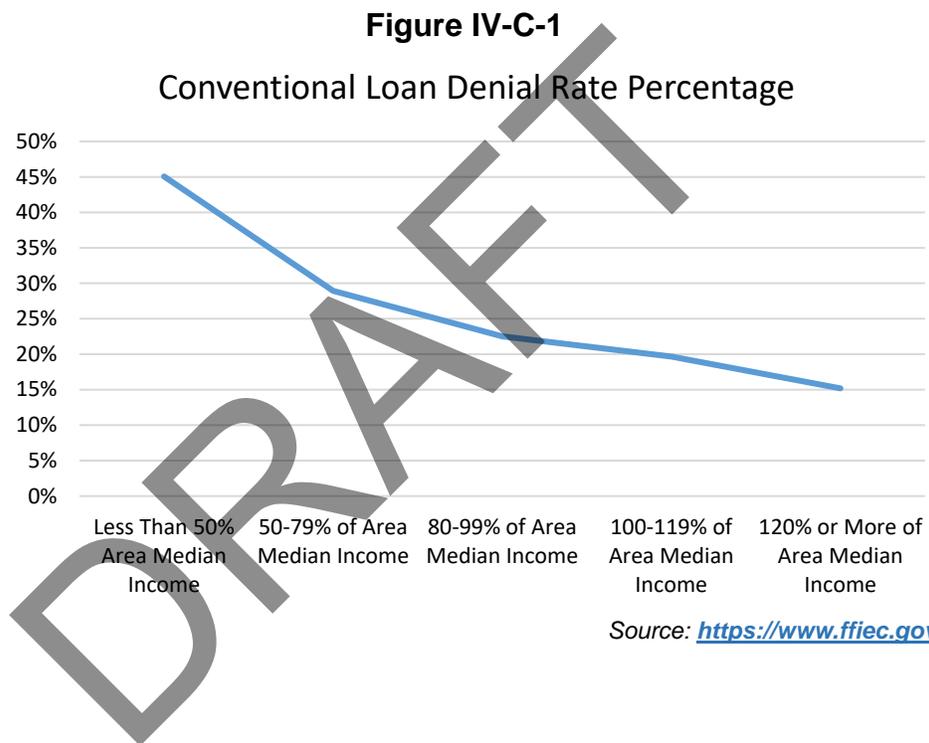


Figure IV-C-2

Conventional Loan Denial Rates by Race/Ethnicity and Income Category



Source: <https://www.ffiec.gov/hmda/>

Based on this data analysis, there is the possibility that there are discriminatory lending practices in Guilford County, as there are disparities between the origination and denial rates of minority and non-minority households. In every income category, White applicants have a higher loan origination rate and a lower denial rate than minority applicants. While denial rates decrease as income increases, minorities have higher denial rates.

While this data provides an insight into lending patterns in Guilford County, it should be noted that data identifying race that is unique to the City level would yield more conclusive findings and provide a more accurate understanding of any existing lending issues in the City. However, this data is not available.

D. Citizen Participation

The City of High Point's Department of Community Development & Housing undertook a broad participation strategy for this Analysis of Impediments to Fair Housing Choice to engage as many individuals, organizations, and agencies as possible.

Stakeholders: The City of High Point developed a list of stakeholders with direct knowledge of, and experience in, the housing market and issues affecting fair housing. Identified stakeholders were divided into the following categories:

- City Departments
- The Housing Authority of the City of High Point
- Health Service Providers
- Direct Housing Stakeholders
- Social Service Providers
- Fair Housing Agencies
- Planning Organizations
- Workforce & Economic Development Organizations

Agency/Organization/Stakeholder Meetings: The City of High Point contacted identified organizations and agencies to set up smaller meetings consisting of similar organizations to hold more in-depth conversations.

- City of High Point Public Safety – December 9, 2019 (High Point City Offices)
- Economic Development & Job Training – December 10, 2019 (High Point Parks & Recreation)
- Educational Providers – December 10, 2019 (High Point Parks & Recreation)
- High Point Human Relations – December 10, 2019 (High Point Parks & Recreation)
- Fair Housing Services – December 10, 2019 (High Point Parks & Recreation)
- Health Care Providers – December 10, 2019 (High Point Parks & Recreation)
- Homeless Services – December 10, 2019 (High Point Parks & Recreation)
- Housing Providers – December 11, 2019 (High Point Parks & Recreation)

- The Housing Authority of the City of High Point – December 11, 2019 (High Point Parks & Recreation)
- Community-Based Organizations – December 11, 2019 (High Point Parks & Recreation)
- Social Services – December 11, 2019 (High Point Parks & Recreation)

Any identified stakeholders that were not available to attend the meeting, as well as some of the aforementioned stakeholders, were then called to either (1) follow-up if they partook in either of the Public Meetings or (2) discuss fair housing issues with agencies/individuals who were unable to attend one of the Public Meetings.

Public Meetings: The City of High Point held two (2) Public Meetings to engage the public and local organizations/agencies and help identify issues impacting Fair Housing Choice. The First Public Meeting was held on Monday, December 9, 2019 at the Morehead Recreation Center and the Second Public Meeting was held on Tuesday, December 10, 2019 at the Morgan Room of the High Point Library.

There were three (3) resident attendees at the meeting held on Monday, December 9, 2019, and six (6) resident attendees at the meeting held on Tuesday, December 10, 2019. However, the eleven (11) scheduled stakeholder meetings with various government staff, social service organizations, housing agencies, realtors, and banks were well-attended. Public Meetings were advertised in the “High Point Enterprise,” the largest English-language newspaper in circulation in the area.

- The City of High Point emailed Public Meeting and Stakeholder Meeting invitations to:
 - The Housing Authority of the City of High Point
 - Community Organizations
 - Economic Development Organizations
 - Education Providers
 - Fair Housing Organizations
 - Housing Providers
 - Health Care Organizations
 - Homeless Service Providers
 - Public Safety
 - Social Service Providers

Additional Outreach: The City of High Point also employed the following to encourage extensive engagement and participation:

- Invitations to the stakeholder meetings were sent out by the City prior to the meetings (November 25th through November 29th).
- The City of High Point conducted phone interviews with three (3) additional City Departments who were unable to attend the public hearings or individual group meetings.

Resident Surveys: A survey was available online in both English and Spanish and physical copies were placed on public display to encourage resident input.

The online survey produced 28 responses. Actions to spread knowledge of the surveys included sending the survey to neighborhood organizations and associations for distribution, and emailing the link to interested parties. The information provided in these anonymous surveys were crucial in developing an accurate assessment of fair housing issues in the City.

The following is a summary of the 28 responses received:

Notable Characteristics

Some of the notable characteristics of respondents included (as a percentage of those that answered each question):

- The majority of respondents are female at 54.17%.
- The vast majority (70.83%) of respondents are White.
- Two-fifths of the respondents were over the age of 50 (41.67%). More than half of respondents were over the age of 40 (62.50%).
- Of those that answered the question, 68.00% were either a two-person or three-person household.
- 63.16% of respondents felt that residents of the City did not know how to report fair housing violations, and furthermore 26.31% thought fair housing complaints were not reported due to fear of retaliation.

The following is a list of needs/issues associated with different areas of community and economic development. Values were calculated as a percentage of those that answered each question.

Accessibility:

- 52.38% of respondents believe that there is a need for curb and sidewalk improvements in the City.

- 9.09% believe there are not enough ramps leading to public facilities throughout the City.

Employment:

- 64.29% of respondents indicated that there are employment issues in the City.
- 72.22% of respondents believe that there is a lack of job opportunities.
- 50.00% of respondents cite the lack of transportation as a barrier to employment.
- 22.22% of respondents believe that discrimination affects employment.

Housing:

- 81.82% said that there is a need for more affordable housing.
- 72.73% said that negligent landlords were a major issue in the City.
- 54.55% said there is a need for major rehabilitation of houses.
- 31.82% of respondents believe that there is a lack of housing options.
- 13.64% of respondents cite lead paint and lead pipes as a problem.

Fair Housing:

- Only 4.17% of respondents are aware that residents can make reasonable housing accommodation requests to their landlords.
- 41.67% believed residents did not know who to contact, and 54.17% were unsure of who to contact.

Reasons Fair Housing Complaints Are Not Reported:

- 26.31% specifically mention fear of retaliation, including eviction, legal reprisal, and poor retreatment.
- 63.16% point to a lack of knowledge in reporting practices as a cause.
- 5.26% of respondents believed the process took too long.
- 5.26% of respondents believed that distrust of the process contributes to the lack of reporting.

Transportation:

- 30.43% of respondents stated believe that there are not enough service hours for public transit.
- 17.39% of respondents believed that bus routes in the City are disconnected.
- 69.57% of respondents believe that the City needs to become more walkable.

- 30.43% of respondents believe that the City needs more bike routes and bike lanes.

Other:

- 28.57% of respondents used some type of medical or mental health social service.
- 9.52% of respondents believed that access to food is an issue.

The following table illustrates situations that may result in further discriminations and/or barriers to fair housing in the City of High Point:

Table IV-D-1: Resident Survey Results

	Strongly Agree	Agree	Neutral / Unsure	Disagree	Strongly Disagree
State or Local Laws and policies that limit housing choice	15.79%	5.26%	42.11%	31.58%	5.26%
Lack of fair housing organizations in the City	21.05%	21.05%	31.58%	21.05%	5.26%
Lack of knowledge among bankers/lenders regarding fair housing	15.79%	26.32%	36.84%	21.05%	0.00%
Lack of knowledge among landlords and property managers regarding fair housing	10.53%	15.79%	57.89%	10.53%	0.00%
Lack of knowledge among residents regarding fair housing	21.05%	47.37%	31.58%	0.00%	0.00%
Lack of accessible housing for persons with disabilities	27.78%	22.22%	44.44%	0.00%	5.56%
Lack of accessibility in neighborhoods (i.e. curb cuts)	21.05%	36.84%	36.84%	5.26%	0.00%
Lack of fair housing education	31.58%	26.32%	36.84%	5.26%	0.00%
Lack of affordable housing in certain areas	42.11%	31.58%	10.53%	10.53%	5.26%
Concentration of subsidized housing in certain neighborhoods	57.89%	15.79%	15.79%	5.26%	5.26%
Other barriers	13.33%	6.67%	73.33%	0.00%	6.67%

Source: Citizen Survey

Additional Comments or Concerns:

Typical responses included:

- “[We need] Improvements to access facilities, such as sidewalks and public transportation.”
- “Transportation [is] needed as related to receiving healthcare.”
- “[There is a] Lack of accessibility to fresh fruits and vegetables for residents without transportation. Sidewalks are needed to safely get to and from grocery stores from public housing areas.”

Public Meeting on the Draft AI Public Comments

The 2020 Analysis of Impediments to Fair Housing Choice was made available on the City’s website at <https://www.highpointnc.gov/231/Community-Development-Housing>, and hardcopies were available upon request from the City’s Public Records Request Portal at <https://www.highpointnc.gov/1813/Public-Records-Request> from June 15, 2020 to July 14, 2020.

The document was on public display for a period of thirty (30) days. Residents were encouraged to submit written or oral feedback on the Analysis of Impediments.

Based on the citizen participation process and fair housing analysis, the City of High Point staff identified the following fair housing issues:

- **Housing Opportunities:**
 - There is a shortage of affordable housing in the City of High Point that is decent, safe, and sanitary.
 - There is a lack of Federal and State funds for housing subsidies and the development of new affordable housing is not economically feasible for private developers.
 - There is a shortage of affordable housing units in areas of opportunity where low-income persons and families would like to live.
 - The population of the City of High Point has been growing, but the housing supply has not kept pace at the same rate as the population.
 - The number of renter-occupied units has been increasing as the number of owner-occupied units has been decreasing in the City of High Point.

- There is enough vacant land for infill housing, but a lack of financial incentives to develop affordable housing on the vacant land by public, private, and non-profit developers.
- **Housing Choice:**
 - Housing units that are deteriorated and below code standards tend to be available at affordable rents.
 - Current and existing affordable housing units are concentrated in neighborhoods that are impacted concentrations of racial or ethnic minorities and low-income households.
 - The special needs population in the City of High Point has increased in the last 15 years, but landlords are frequently unwilling to make reasonable modifications and accommodations to their housing units.
 - There are physical, economic, and social justice barriers that impede the development of new affordable and accessible housing in the City of High Point.
 - There is a lack of "mixed-income" housing being built in the City.
 - There is a high demand for elderly housing in the City.
 - New affordable rental housing in the City of High Point can face opposition from the public and "NIMBYism," especially compared to market rate multi-unit housing, which faces less opposition. Historic denials of multi-family affordable housing developments affects housing choice.
- **Cost Overburden:**
 - The construction of multi-family housing is a difficult process, requiring a substantial investment of time and money while the number of families in demand of affordable multi-family housing continues to grow.
 - Lower household incomes create cost overburdened housing conditions; approximately 24.1% of homeowners and 55.7% of renters in the City are cost overburdened by 30% or more.
 - Individuals and families in the lowest-income areas struggle to find higher paying jobs.
 - The elderly, on fixed income, cannot afford to make the repairs, alterations, and accommodations to their homes to make them accessible to their needs so they can remain in place.
 - Often due to long-term neglect, housing prices are inflated, especially in the Core City, and older housing stock becomes economically infeasible for low- and moderate-income homeowners to rehabilitate.

- Property appraisals will often consider the surrounding neighborhood, particularly in low-income neighborhoods, which discourages investment.
- Housing sales prices in the Core City are too low, creating an environment where rehabilitation costs exceed housing value.
- **Disability/Accessibility:**
 - There is a lack of housing in the City that is accessible and affordable for the elderly, the disabled, and persons with special needs.
 - The denial by some landlords to make reasonable modifications and accommodations limits the amount of accessible units in the City that are for rent for persons with special needs.
- **Fair Housing:**
 - Tenants and homebuyers do not always file housing complaints when they have been discriminated against, either because they do not know about the Fair Housing Act or they do not know where to report complaints.
 - Property appraisals will often create “de facto redlining” by considering the neighborhood and discouraging investment and/or steer potential homebuyers that may want to rehabilitate a house.
 - There had been discussion in focus groups of realtors in the area that have been steering homebuyers using a language code.
 - Fair Housing training for realtors is an elective with hourly requirements.
 - The State Zoning Code has created distance requirements for group homes, though this is currently being challenged in court.
 - Persons with Limited English Proficiency (LEP) do not always have a fair housing choice.
 - There is a lack of awareness of tenants' rights and landlords' responsibilities, including what reasonable modifications and accommodations are.
- **Access/Mobility:**
 - The limited public transportation network in the City is not convenient for lower income households to go to: work, health care, shopping, etc., which limits the choices where a low-income household can live.
 - The City of High Point is not designed for walkability, and there is a need for sidewalks in many portions of the City.

- Landlords will frequently refuse to make reasonable modifications and accommodations, and discriminate against elderly tenants and the disabled.
- Families and individuals have a right to live wherever they chose, if affordable housing is available outside areas of concentration of low income or racial concentration.

The City of High Point held a Public Hearings on the “draft” 2020-2024 Analysis of Impediments on Monday, May 4, 2020.

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V. Actions and Recommendations

The following impediments to fair housing choice and recommendations are presented to assist the City of High Point to affirmatively further fair housing in the Region. The previously identified impediments to fair housing choice were discussed in Section III and progress was reported for each impediment. New and carried over impediments to Fair Housing Choice are presented on the pages that follow. Of the previously identified impediments, racial segregation, a lack of accessible housing, and economic barriers for racial and ethnic minorities are still present in the City of High Point, despite the City's best efforts, and based on economic conditions, will continue to be addressed by the City of High Point.

Below is a list of impediments that were developed by the City of High Point for the 2020 Analysis of Impediments to Fair Housing Choice.

A. Impediments to Fair Housing Choice

Using these findings, the City of High Point developed the following impediments for the 2020-2024 Analysis of Impediments to Fair Housing Choice and defined specific goals and strategies to address each impediment.

- **Impediment 1: Lack of Affordable Housing**

There is a lack of affordable housing in the City of High Point caused by the population growth in the Piedmont Region of North Carolina. This has created a high demand on a limited supply of housing, and a corresponding increase in the price of rent and the sales price of housing.

Goal: Increase the supply of affordable housing through new construction and rehabilitation of housing.

Strategies: In order to address the need and achieve the goal for more affordable housing, the following activities and strategies should be undertaken:

- **1-A:** Continue to promote the need for affordable housing by supporting and encouraging private developers and non-profits to develop, construct, and/or rehabilitate housing which is affordable.
- **1-B:** Encourage and promote the development, construction, and/or rehabilitation of mixed-income housing in the city.
- **1-C:** Financially support the rehabilitation of existing housing owned by seniors and lower-income households to conserve the existing affordable housing stock in the city.
- **1-D:** Provide financial and development incentives to private developers and non-profits which construct and/or rehabilitate affordable housing.

- **Impediment 2: Lack of Accessible Housing**

There is a lack of accessible housing in the City of High Point since the supply of accessible housing has not kept pace with the demand caused by the increase in the number of elderly persons in the city and the desire of disabled persons who want to live independently.

Goal: Increase the supply of accessible housing through new construction and rehabilitation of accessible housing for persons who are disabled and the elderly.

Strategies: In order to address the need and achieve the goal for more accessible housing, the following activities and strategies should be undertaken:

- **2-A:** Continue to encourage and promote supply of accessible housing by supporting and encouraging private developers and non-profits to develop, construct, and/or rehabilitate housing that is accessible to the elderly and persons who are disabled.
- **2-B:** Financially assist in improvements to single-family owner-occupied homes to make them accessible for the elderly and/or disabled so they can continue to remain in their homes.
- **2-C:** Encourage and promote the development of accessible housing units in multi-family buildings as a percentage of the total number of housing units.
- **2-D:** Encourage landlords to make reasonable accommodations to units and buildings so persons who are disabled can continue to reside in their rental units.

- **2-E:** Enforce the Americans with Disabilities Act (ADA) and the Fair Housing Act (FHA) in regard to making new multi-family housing developments accessible and visitor-friendly for persons who are physically disabled.

- **Impediment 3: Barriers Limiting Housing Choice**

There are physical, economic, and social barriers in the City of High Point which limit housing choices and housing opportunities for low-income households, minorities, and the disabled members of the city's population.

Goal: Eliminate physical, economic, and social barriers in the City of High Point and increase housing choices and opportunities for low-income households and members of the protected classes throughout the city.

Strategies: In order to achieve the goal for better housing choice, the following activities and strategies should be undertaken:

- **3-A:** Deconcentrate pockets of racial and ethnic poverty by providing affordable housing choices for persons and families who want to reside outside impacted areas.
- **3-B:** Support and promote the development of affordable housing in areas of opportunity so minority and low-income persons and families may have a choice to reside there.
- **3-C:** Promote and encourage homeownership initiatives for low-income households to build community wealth and create neighborhoods of choice.
- **3-D:** Support and provide subsidies to promote housing investment in the central core of the city and overcome low housing appraisals in core neighborhoods.

- **Impediment 4: Lack of Fair Housing Awareness**

There is a continuing need to educate and promote the rights of individuals, families, and members of the protected classes in regard to

the Fair Housing Act (FHA), awareness of discriminatory practices, and combatting “NIMBYism.”

Goal: Improve knowledge and awareness of the Fair Housing Act (FHA), related housing and discrimination laws, and regulations, so that the City of High Point can Affirmatively Further Fair Housing (AFFH) and eliminate the negative attitude of “Not In My Back Yard” (NIMBYism).

Strategies: In order to address the need and achieve the goal of promoting open and fair housing, the following activities and strategies should be undertaken:

- **4-A:** Continue to educate and make residents aware of their rights under the Fair Housing Act (FHA) and the Americans with Disabilities Act (ADA).
- **4-B:** Continue to educate and make realtors, bankers, and landlords aware of discriminatory housing policies and promote fair housing opportunities for all residents of the City of High Point.
- **4-C:** Continue to educate real estate appraisers about property values to discourage “de facto redlining” created by low property appraisals.
- **4-D:** Continue to support the High Point Human Relations Division to assist persons who may be victims of housing discrimination and/or are not aware of how to file a housing complaint.
- **4-E:** Continue to monitor the data from the Home Mortgage Disclosure Act (HMDA) to ensure that discriminatory practices in home mortgage lending are not taking place.
- **4-F:** Publish and distribute housing information and applications in both English and Spanish to address and inform the non-English speaking residents in the City of High Point.
- **4-G:** Continue to educate homebuyers about “predatory lending,” “steering,” and “redlining,” to eliminate deceitful practices when purchasing or selling a home.
- **4-H:** Educate residents and local officials to prevent them from pressuring to enact, or enacting and applying zoning or land use laws based on fears, prejudices, stereotypes, or unsubstantiated assumptions of community members to combat “NIMBYism.” See Joint HUD-DOJ Statement for guidance (Appendix E).

- **4-I:** Educate and train local elected and appointed officials regarding discriminatory practices when enacting or applying zoning or land use laws, and that acquiescence to community bias can be considered discriminatory. See Joint HUD-DOJ Statement for guidance (Appendix E).

- **Impediment 5: Lack of Economic Opportunities**

There are a lack of economic opportunities in the City of High Point for lower-income households to increase their income and thus improve their choice of housing.

Goal: Increase the employment opportunities and access to jobs in the City of High Point, which will increase household income and make it financially feasible to live outside concentrated areas of poverty.

Strategies: In order to address the need and achieve the goal for better economic opportunities, the following activities and strategies should be undertaken:

- **5-A:** Encourage and strengthen partnerships between public and private entities to promote economic development, improve the local tax base, and create a sustainable economy.
- **5-B:** Promote and encourage the expansion of existing commercial and light industrial enterprises, and small-scale manufacturing, which will create more employment opportunities.
- **5-C:** Provide financial and development assistance to enterprises, through workforce development and job training which will create higher wages.
- **5-D:** Identify development sites for potential private investment and/or expansion of existing enterprises.
- **5-E:** Support the increase in the number of bus routes and hours of operation in the City so low-income workers will have access to job opportunities outside their neighborhood.
- **5-F:** Promote and encourage wealth-building initiatives, such as Individual Development Accounts (IDA), for low-income populations, immigrants, and refugees who are cost overburdened and living under median income.

B. Activities and Recommendations to Affirmatively Further Fair Housing

To affirmatively further fair housing, the following actions have, and will be, implemented by the City of High point through its Fair Housing Plan through various activities noted below:

1. The City of High Point's Human Relations Division addresses Fair Housing Complaints in the City. The City will continue to support the expansion of the capabilities of the Human Relations Division.
2. The City of High Point's Human Relations Division will continue to enforce fair housing and provide public education and outreach.
3. The City will reach out to NC Legal Aid to assist low income residents with free legal assistance to ensure that they are not denied a fair housing.
4. The City will continue to provide funds to monitor and report housing discrimination complaints.
5. The City will encourage testing and auditing of fair housing practices through its regional fair housing providers.
6. The City of High Point and the High Point Human Relations Division will continue to educate and attempt to overcome any remaining "Not in My Back Yard" (NIMBYism) attitudes in the City through its fair housing providers.
7. The City will continue to make every attempt to increase geographic choice in housing by providing links on the City website for low-income households to use.
8. The City of High Point's will continue to demolish vacant structures, acquire vacant land, and assemble parcels for large affordable housing development.
9. The City of High Point will continue to pursue affordable housing development within neighborhoods of choice.
10. City Departments will assist High Point Public Transit in recruiting CDL drivers to expand bus service hours.
11. The City of High Point's Human Relations Division and The Housing Authority of the City of High Point will continue to promote integration of public housing.
12. The City of High Point will encourage training for appraisers to eliminate discriminatory practices in housing appraisals.

13. The Housing Authority of the City of High Point will promote Section 8 Voucher landlords to rent to residents outside racially and ethnically concentrated areas of poverty.
14. The City of High Point will evaluate provisions in its Fair Housing Ordinance in order to qualify for Substantial Equivalency certification.
15. The City of High Point will continue to partner with their local developers and CHDOs to improve the quality of the affordable housing stock in the area for renters and homeowners.
16. The City will continue to promote economic development programs to assist in providing quality jobs to residents that will enable them to increase household income to access more housing options.
17. On an annual basis, the City of High Point will continue to declare April to be Fair Housing Month via proclamation, in conjunction with holding an annual fair housing workshop with partners.
18. The City of High Point's Human Relations Division will continue to perform outreach to the public by providing updated housing discrimination information.
19. The City of High Point will continue to support housing rehabilitation programs problems to assist homeowners and renters to attain safe, decent, sound, and affordable housing.

VI. Certification

Signature Page:

I hereby certify that this 2020-2024 Analysis of Impediments to Fair Housing Choice is in compliance with the intent and directives of the Community Development Block Grant (CDBG) Program and HOME Investment Partnership (HOME) Program regulations.

City of High Point, NC:

Jay W. Wagner, Mayor

Date

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VII. Appendix

The following items are in the appendix:

- Appendix A – Agency/Organization Meetings & Additional Consultations
- Appendix B – Resident Surveys and Agency Surveys
- Appendix C – Public Comments
- Appendix D – HMDA Data
- Appendix E – Joint Statement of the Department of Housing and Urban Development and the Department of Justice: State and Local Land Use Laws and Practices and the Application of the Fair Housing Act
- Appendix F – Page Number List of Tables, Figures, and Maps

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A. Appendix A – Agency/Organization Meetings

Attached are summaries of the following meetings:

- City Departments
- City Management Team
- Community Organizations
- Economic Development Organizations
- Education Providers
- Fair Housing Agencies
- Health Care Providers
- Continuum of Care
- The Housing Authority of the City of High Point
- Housing Providers
- Public Safety
- Social Services
- Phone Interviews with Transportation
- Phone Interview with City Planning

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City of High Point, North Carolina –
FY 2020-2024 Five Year Consolidated Plan, FY 2020 Annual Action Plan, and
FY 2020 Analysis of Impediments to Fair Housing Choice
City Manager Meeting – City Hall, 3rd Floor Fishbowl Conference Room
Monday, December 9, 2019 - 1:00 PM

Name	Organization	Phone Number	Email Address
EMC OLMEDO	City of HP	336 883 3018	EMC.OLMEDO@highpointnc.gov
Michael McNaughton	CHA	336-883-3676	Michael.McNaughton@nc883.com
Greg Ferguson	CHP	336.883-8515	greg.ferguson@highpointnc.gov
Randy McCastin	CHP	336 883-3291	randy.mccastin@highpointnc.gov
Walter J. Haglund	Urban Design Ventures	(413) 461-6916	walth@urban-design.com
Brandon Wilson	Urban Design Ventures	412-461-6916	brandon@urbandesignventures.com
Michelle McNaughton	CHP	(336) 883-3685	michelle.mcnaughton@highpointnc.gov
Nena Wilson	City of High Point	336-883-3351	tharena.wilson@highpointnc.gov

City of High Point, NC

2020-2024 Five Year Consolidated Plan & Analysis of Impediments

City Management

Monday, December 9, 2019 at 1:00pm

The following was discussed at the meeting:

- City priorities include economic development – the City’s tax base is growing but not as rapidly as the management team would like.
- Housing is a City priority. Most of the new housing development takes place in greenfields on the northern end of the City.
- The tax base that greenfield development generates pays for itself, but this is upper end.
- Redevelopment of the older housing stock is not paid for through new housing.
- It costs more to provide housing services on the part of the City than property tax revenue generated. Replacing the existing housing stock in the core city and upgrading it is a priority.
- Much of the housing stock was built in the 30s and 40s and there is a lot of demolition of housing that does not meet minimum standards.
- The Core City downpayment assistance program comes out of the general fund to provide \$500,000 regardless of income limits.
- They are going to do a study in the near future that determines why housing prices have increased.
- Water lines and sewer lines are aging and the City is working on replacing them.
- Whenever the City does a construction project they update water and sewer.
- The public works building is also an older building in a mill complex.
- Roads and other infrastructure are a need. They need to budget approximately \$5 million per year for street resurfacing.
- Their older downtown was taken up by the furniture market which provides a tax base and a large event twice per year, but a new downtown must be constructed on the north side of the furniture market.
- There is additional development coming in to the new downtown near the baseball stadium.
- The furniture industry is strong but not as strong as it once was. Some manufacturing is coming back but with far less jobs. The furniture makers are struggling to find trained manpower.
- The furniture market does not provide many big cultural events outside the big events.
- Public safety is going to be a local priority with the new council.
- Historically, the City has low crime rate, but recently there has been gang violence getting media attention.
- The police department is now at full capacity. They have a paid fire department. The High Point Model for policing is a national model for some of its programs including deterrence.
- Neighborhood stabilization is a need. This ties in to a need for good jobs.
- The homeless population is more visible than it has been in the past. There are aggressive panhandlers, squatters, and tent camps on vacant properties.

- The homeless population has been growing slightly. Overall there are more homeless women than ever. There is one women's shelter and one men's shelter and they are both full, especially when the weather is cold.
- The women's shelter is looking to expand during weather advisory.
- A church, Mt. Zion, is starting to take charge on opening their doors to homeless people.
- Most of the efforts in ending homelessness are nonprofit-driven. Greensboro receives ESG funds.
- There is not a great deal of nightlife in the City. There are no good walkable areas with multiple options in one place. There is a goal and action plan underway to create a new hotel and food hall near the baseball stadium.
- The Palladium, in the northern end of the City with more affluent ZIP codes, is an active nightlife spot.
- Public transportation is funded by the City. The system is good during the day but it shuts down at 6pm at night. It has limited hours on the weekends. They would like to see more coverage.
- The buses will not take people to newer jobs that are further out into the County, or in larger job centers like Greensboro and Winston-Salem.
- The regional system goes to outlying areas and brings them to Greensboro, Winston-Salem, and High Point. It connects their three systems.
- Many people complain about public transportation because it cannot get them to 2nd shift and 3rd shift jobs.
- Recruiting bus drivers is a challenge. They have approved an expansion of routes but they have not been able to find the bus drivers to implement it.
- The local community college is beginning to provide CDL certification.
- There is an initiative to encourage small-scale manufacturing in the southwest corner of the City that has many vacant buildings. Furniture and textiles had formerly been manufactured there.
- Three buildings were purchased to be marketed to various groups and marketed as a greenway to provide amenities to potential light industrial.
- The City is very diverse. There have been increases in Hispanic/Latino, Middle Eastern, and Pakistani communities.
- There are food deserts within the City. There are long-term efforts to encourage the entry of grocery stores.
- The City is averaging new construction of 50-60 units per year through LIHTC developments. As substandard rentals have been torn down, LIHTCs have helped replace them. They have gotten 5 LIHTC developments.
- The Housing Authority is putting out a 4% bond to redo a housing development.
- They have an NRSA. There are two opportunity zones in the City and a third nearby in Forsythe County. One of their Opportunity Zones comes very close to Main Street and encompasses commercial area.
- The City and the County do not collaborate well. The relationship between City and County elected officials is strained and the County does not offer traditional County services so the City must pick up these services.



City of High Point, North Carolina –
 FY 2020-2024 Five Year Consolidated Plan, FY 2020 Annual Action Plan, and
 FY 2020 Analysis of Impediments to Fair Housing Choice
 Public Safety Meeting – City Hall, 3rd Floor Fishbowl Conference Room
 Monday, December 9, 2019 - 2:00 PM

Name	Organization	Phone Number	Email Address
KENNETH J. SHURTZ	POLICE DEPARTMENT	336 887 7971	ken.shurtz@highpointnc.gov
Thomas Reid	Fire Department	336 883-3358	thomas.reid@highpointnc.gov
Brian A Evans	Fire Department	336-883-3370	brian.evans@highpointnc.gov
Brandon Wilson	Urban Design Ventures	478-461-6916	brandon@urbandesignventures.com
Duff Hay LD	Urban Design Ventures	478-461-6916	watt@urban-design-ventures.com
Nena Wilson	City of High Point	336-883-3351	narena-wilson@highpointnc.gov
Michelle V McNair	CHP	336/883-3685	Michelle.McNair@highpointnc.gov
Michael E. Madsen	CO+H	756-883-3676	michael-madsen@highpointnc.gov

City of High Point, NC

2020-2024 Five Year Consolidated Plan & Analysis of Impediments

Public Safety

Monday, December 9, 2019 at 2:00pm

The following was discussed at the meeting:

- The fire department's main involvement with the Planning department has been proving that they can be involved for safety factors.
- The fire department participates in Operation Inasmuch. They have 14 fire stations and 235 personnel. They are a Class 1 Accredited Agency.
- They have not experienced arsonists outside of expected juvenile arson.
- They have a robust program to deal with juvenile fire starters and work with the court system and police department. This program has run for 12-15 years and have only had 3 re-offenders.
- Kitchen fires are the biggest fire cause throughout the nation. This is due to latchkey kids cooking, or based on people returning home and cooking while intoxicated.
- They will also do inspections for commercial and multi-family housing.
- The fire department does first response but not EMS transport. They have a dive team and a rescue team. They also have rescue teams and structural collapse teams.
- There has been deferred maintenance on stations built in the early 60s. It is in the fire department's CIP plan to replace these. 5 of 14 need to be replaced.
- The fire department is having trouble recruiting minorities. This is a nationwide problem.

- The police department is 300 people strong, 255 sworn officers and 35 civilians. There is a need for six more police officers.
- There are a number of police officers in training, so this means there is a 18-20% gap in the number of people filling the job.
- The police have had challenges recruiting. They have had even bigger challenges recruiting diverse populations. They are impacted by politics.
- 2018 was one of the safest years for violent crime but the media did not frame it as this. They are a data driven department and have seen increases in crime, but not to the point of significance.
- There has been a decrease in property crimes but an increase in car thefts.
- The opioid problem continues to impact the region. They saw it begin to affect the region in 2014 and kept it as data earlier than other departments which made the opioid issue look worse in the area than in others, though this was skewed.
- Narcan and Naloxone are out in multiple locations. They have seen 22 overdose deaths this year.
- There are harm reduction coalitions and prevention efforts but the deaths continue to grow.
- The police use the HIPE acronym/method.
- There is a strategic focus on prevention and deterrence.

- The City has been recognized on its efforts for deterrence. They had open air drug markets in the core City and the High Point Model was used for deterrence. Mobile phones have changed the use of this model.
- Domestic violence numbers in the City have gone down. They have the Family Justice Center in Downtown High Point. It complements the domestic violence and family violence. Detectives work there and also works in the Special Victims Unit and works for advocacy organizations. Offender-Focused Domestic Violence Initiative has been around for about 6 years.
- The Fire Department has been gathering information on homeless camps. The assistance to the homeless camps end up making the fire department's job harder. There have been instances of people setting each other's tents on fire.
- There are frequent drug overdoses in the homeless camps.
- There will be a mapping project of the homeless camps on the part of the fire department.
- The blight efforts on the part of the City are tied together with the data driven methods of the Police Department. They work closely to map the hot spots and determine the areas to do blight removal work.
- There are beat patrolmen deployed in a data-driven way.
- Downtown has a few extra beat patrolmen to continue to encourage growth near the baseball stadium. This has driven the homeless population uptown.
- The Emergency Manager is in the fire department. The County has an emergency management office and the City has a coordination center.
- They are on the state-based EOC network. They participate in emergency response for gas pipelines, railroads, and highways that run through the City and have emergency management plans for all of these.
- With the two lakes in the City, the dams are inspected regularly and the emergency management office.
- In the River Meade area, there are flood hazards.
- The City has been working for several years to clean creeks and piping to alleviate flooding.
- The police are focused on the national emergency management model and focus on the County's emergency management plan as well. The County is the overall driver for the police department.
- The police department strives to train people to the Emergency Management codes and levels to manage the emergency. Higher ranked police have higher ranked Emergency Management Training.
- The Emergency Management Team in the police department has a team that serves in various finance, administrative, and liaison roles to work with the public following the disaster and emergency.
- The Fire Department has received grants to purchase two generators to turn recreation centers into shelters. This is driven from hurricanes that do not make it to this area. They will receive FEMA money and displaced people through Guilford County.
- The Police Department has worked with COPS and JAG grants.
- Public Safety will deploy rescue teams to the coast and both provide and receive mutual aid.



City of High Point, North Carolina –
FY 2020-2024 Five Year Consolidated Plan, FY 2020 Annual Action Plan, and
FY 2020 Analysis of Impediments to Fair Housing Choice
City Departments Meeting – City Hall, 3rd Floor Fishbowl Conference Room
Monday, December 9, 2019 - 3:00 PM

Name	Organization	Phone Number	Email Address
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City of High Point, NC

2020-2024 Five Year Consolidated Plan & Analysis of Impediments

City Departments

Monday, December 9, 2019 at 3:00pm

The following was discussed at the meeting:

- There was a need for the downtown area to have a place to congregate.
- Economic Development has recently released their annual report. They will co-market with Greensboro.
- There was discussion of having one Countywide group for marketing of the region. It is not a County organization but an alliance between the two communities.
- There are more manufacturing workers in Guilford County than in any other County in North Carolina, and they are top 5 in this worker class in the Southeast.
- High Point owns the airport in the region.
- There is a Megasite in Randolph County that is marketed for aviation or automotive manufacturing.
- The recently constructed stadium is intended to be used for multiple sources of entertainment like concerts and soccer.
- High Point University is a job and investment driver in the region. This has led to the recruitment of a laser cutting company.
- The Northern End of High Point is composed of larger business parks.
- The focus is to have high-paying manufacturing companies located in the City.
- The areas outside of downtown have higher poverty and require improvements.
- The previous council has worked to recruit millennials, create a catalyst project, and remove blight.
- The Economic Development Department was awarded a Small Manufacturing Technical Assistance Grant from Smart Growth America. They are working to encourage small scale manufacturing in older buildings with lower foot traffic.
- EDC is in the process of acquiring two small parcels for small-scale industries.
- There are two Opportunity Zones in the City, and the initial target area for the small scale manufacturing is in the Opportunity Zone. There is an additional zone in Forsythe County on the edge of the City.
- There is a high public demand for grocery stores. Three stores have been added as a result, but two stores were lost in the time that those were added.
- They had an Action Plan for the GCEDA, and this is the joint plan for the City of High Point and City of Greensboro.
- Unincorporated areas of the County are addressed by either High Point or Greensboro.
- There was a recent study to show the impact of the furniture industry in the area.
- There had been previous attempts to use CDBG funds to do economic development in the City, but these were largely unspent and diverted to housing.
- Crime in the Southern part of the City is an issue. The Sheetz on South Main will close as a result.



City of High Point, North Carolina –
FY 2020-2024 Five Year Consolidated Plan, FY 2020 Annual Action Plan, and
FY 2020 Analysis of Impediments to Fair Housing Choice
City Departments Meeting – City Hall, 3rd Floor Fishbowl Conference Room
Monday, December 9, 2019 - 4:00 PM

Name	Organization	Phone Number	Email Address
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City of High Point, NC

2020-2024 Five Year Consolidated Plan & Analysis of Impediments

City Departments

Monday, December 9, 2019 at 4:00pm

The following was discussed at the meeting:

- Parks and Rec just received grant money to fund their parks with Greenways and Whitewater Conservation. They also receive Federal money funneled through the State.
- Most of the Parks grants are based on the Parks Master Plan.
- The Department has parks that were built with WPA funds and an old department and a staff of 119 full time employees.
- The Parks Department has about a \$12 million budget and brings in about \$3 million in revenue.
- They manage two golf courses, an environmental center, two marinas with water recreation. They have five sworn officers as park rangers, 9 miles of greenway throughout the City, 8 miles of natural trails.
- They are taking on the construction of a new senior center and renovating City Lake Park through a bond measure that was just passed.
- The department has programs for all ages and try to make a diverse offering of programs.
- There are year-round programs that the parks department runs. There are three swimming pools.
- The Parks Department does not have a 504 Plan.
- The Parks Department has a lot of deferred maintenance and ADA accessibility issues, and they will address accessibility issues any time they make improvements.
- Any time the engineer does a road or sidewalk, they update everything to current ADA standards.
- There is a separate department for buildings and grounds.
- The ADA compliance official is not based out of Community Planning anymore.
- Engineering is doing a general stormwater project for public services. They are also doing a subdivision of 21 lots for Community Development – Affordable Housing.
- Engineering will also do the roadway construction and fine grading for the affordable housing subdivision.
- The City's current sewer/water maintenance job is ongoing and there are emergency contracts that engineering will cover when water lines break.
- The City is finishing a Safe Routes to School sidewalks project.
- There is a separate greenways project that engineering is completing.
- Near the stadium area, there are additional sewer upgrades to prepare for the upstream development that is anticipated.
- Engineering will also do minor surveying for other departments.
- Washington Street will be widened and moved.
- The public services department does street resurfacing jobs and contracts out for them.
- Engineering has done a portion of the design for the Southwest Greenway.

- High Point was a Northstate Gigabit City. They have Gigabit Fiber to most housing areas. Free Wifi is provided downtown and in all public facilities.
- The free Wifi was originally done for the furniture market but is now done year-round.
- The City is installing automatic meters for utilities. Most of them use a mesh network, and these could potentially put on community broadband.
- They would like to upgrade parking meters to the Passport system similar to Asheville.
- The City has its own water utility, but buys electricity from Duke and sells it back to the Public through electrocities.
- There are two water reservoirs in the City. The first is City Lake and the second is Ocala.
- IT provides planning with analytical capacity for GIS and data.
- There is a plan to create an open data portal.
- IT is going to go through its Enterprise Resource and Planning, and Community Development will be a large part of this project.
- The department has been using the Neighborly Program and the Tolemi Building Blocks layer.
- They have a website for The Point and they have 87 different end points for GIS data.

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City of High Point, North Carolina –
 FY 2020-2024 Five Year Consolidated Plan, FY 2020 Annual Action Plan, and
 FY 2020 Analysis of Impediments to Fair Housing Choice
 Economic Development – High Point Parks and Recreation
 Tuesday, December 10, 2019 - 9:00 AM

Name	Organization	Phone Number	Email Address
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City of High Point, NC

2020-2024 Five Year Consolidated Plan & Analysis of Impediments

Economic Development

Tuesday, December 10, 2019 at 9:00am

The following was discussed at the meeting:

- Forward High Point is the Downtown Revitalization nonprofit for non-furniture based industries. This includes business recruitment, residential development, and the catalyst project that took place with the baseball stadium.
- Downtown is defined as Commerce to East Chester based on Forward.
- The office market in the City is weak. There is a food hall and office space going up.
- There is not much of a daytime or nighttime population downtown except during the market.
- On Northern Main Street, there has been commercial and residential growth, though largely franchise growth.
- Land in Downtown High Point is extremely expensive. Construction is also extremely expensive. Rents need to be \$24/sq. ft. for a developer to develop in Downtown, but they are getting \$16.
- Downtown housing stock is older. Redevelopment of these buildings is expensive and any rehabs are done on a community benefit basis rather than financial.
- There is no lifestyle support for downtown residential development downtown. There is a need for small business startups.
- The coming food hall is expected to overcome some restaurant startup costs.
- Condo development will lead to smaller units due to the high construction costs.
- There is a need for 3-4 new parking decks in the next ten years and financing for it.
- There is a need for workforce housing options. Even 120% AMI housing in downtown is lacking.
- The furniture market is a driver of the high downtown development cost. This is not a return on investment for them—it is a marketing strategy.
- There is a need for pop-up retail to test the market. The stadium has jump-started big retail but there needs to be a different strategy for smaller retail.
- Zoning changes have affected the downtown development by preventing showrooms in certain areas. Building codes cannot be changed because they are controlled by the state.
- After the success of the Daniel Brooks bond sale, there is the potential to do more bond sales for housing.
- The furniture market has shifted to a design-based market. It has shifted to a vertical-based market which makes it more profitable than Las Vegas and Atlanta, two large competitors.
- The current model of renting for twelve months and using for two in the furniture market is unsustainable.
- The food hall is likely to face challenges due to high rents. It is the most sustainable but not quite there yet.
- The Market Authority will hold a concert at the baseball stadium in 2020, which will be the first multi-purpose use of the stadium.
- There is a need to fund the economic zone, possibly with matching grants.

- There is a need to take some risks to boost the downtown development.
- There is a need to look at housing that surrounds the downtown.
- There is a need to make amenities available for people of all incomes. Greensboro tends to have better amenities for all income brackets.
- Transportation and walkability are lacking.
- There is a need for government to create an environment that will invite the private sector.
- Guilford Technical Community College has been looking at small-scale manufacturing, upholstery, and carpentry sectors and guiding adults into apprenticeships for these programs. Their youth programs are successful.
- There is a need to close a wealth gap due to cyclical poverty.
- There is a need to close some of the initial costs toward job training, both on the end of the employer and the employee.
- There is a need to increase diversity at some of the skills training programs.
- Training that is available is not always accessible, possibly because of transportation or simply because of knowledge.
- Diesel mechanics are a current high demand industry in the area.
- There is a community makerspace in Greensboro that is open to residents of High Point to give experience to underemployed, unemployed, and re-entry populations. However, High Point residents do not go and they are looking at ways to expand this model.
- There is a need for wraparound services and supports in relation to any job training program.

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City of High Point, North Carolina –
 FY 2020-2024 Five Year Consolidated Plan, FY 2020 Annual Action Plan, and
 FY 2020 Analysis of Impediments to Fair Housing Choice
 Education – High Point Parks and Recreation
 Tuesday, December 10, 2019 - 10:00 AM

Name	Organization	Phone Number	Email Address
Dr. Mark E. Harris	GTCC/Education	336-854-0424	meharris@gtcc.edu
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City of High Point, NC

2020-2024 Five Year Consolidated Plan & Analysis of Impediments

Education

Tuesday, December 10, 2019 at 10:00am

The following was discussed at the meeting:

- GTCC's High Point campus serves about 6,000 students per year. They are the only campus on a main urban street for GTCC. They are surrounded by poverty.
- There are about 1,000 students served per week in adult education and basic skills.
- There is a population in ESL that is a refugee population.
- Another population in poverty is made up of adults trying to finish high school.
- Most of GTCC's students need to live with other people to have affordable housing. GTCC will assist with housing through emergency loans, bus transportation, and food.
- There is a lack of affordable housing in the City. There is a large waiting list for the Housing Authority.
- GTCC works with a Veterans' Group to convert an old Civilian Conservation Corps. camp into free housing for Veterans.
- Most of GTCC's funding is through fundraising. They have received numerous grants through the High Point Community Foundation in excess of \$60,000 and they receive funding from Home Depot and Veterans' Organizations.
- Most of the students are day students. The average student's age is 28. There are few extracurriculars. There are a few feeder programs to HPU but most are cost prohibitive for undergrad.
- GTCC does a lot of quick careers and covering skills gaps. There are many underemployed people.
- GTCC receives County funds for maintenance, upkeep, and salaries. The system has been expanding and serves over 35,000 students, mostly with workforce training as opposed to college transfer.
- Apprenticeship programs have been on the rise. There are small business centers in the Chamber of Commerce and High Point. They give free classes on business plans.
- The Small Business Center also provides training, and GTCC has started a furniture academy for the first time in ten years.
- GTCC has started recruiting for apprenticeships in the 11th grade. It had 100% placement and the average starting salary was \$40,000.
- GTCC runs a carpentry course before each market to bring people straight to work.
- Guilford County Schools has 125 schools with 75,000 students. Mr. Simpson has been working as an administrator in this system for 12 years.
- The school is a magnet hybrid school and unique. They serve students in the Penn-Griffin neighborhood. Their attendance zone is a rectangle that covers students in the region, but they also draw students interested in arts education. This draws from all over Guilford County.

- This leads to a mix of underprivileged and privileged families. This is also the only 6-12 school in the district.
- Within the City limits, Ferndale, Wellborn, and Southwest experience similar issues.
- Housing is an issue for many of their families. They have lots of families that move a lot. There is a family that was recently evicted and their school social worker will assist with finding and looking for housing.
- Generational poverty will make an impact on the school system.
- Finding affordable housing is a challenge in the City, and it also has an impact on where children go to school. Schools are inherently considered as “good” or “bad” schools and people struggling with housing will want to send their children to a specific school.
- There are multiple generations living within the same households. Housing is overcrowded based on home visits. Multiple families may be living together.
- High Point University’s expansion is pushing out students in Penn-Griffin.
- High Point University has not offered any relocation benefits following its displacements. People who live in the homes that are displaced are renting and the properties are investment properties. They are often evicted.
- The School district has just put forth a comprehensive plan for facilities throughout the County.
- There is not enough emergency housing.
- The demolitions of public or affordable housing will disrupt transit to walkable jobs at High Point University.
- The Arts Magnet school is for Visual and Performing Arts. Middle school has 300 lottery seats and high school admission is by audition, with training programs in the middle school portion. They have had 100% graduation rate and 100% acceptance to 4-year college rate.
- The School District Plan is available on the Guilford County Schools website.
- Real estate appraisals are an impediment to fair housing choice. These appraisals have the impact of redlining, preventing people from investing in housing in the core. The only way to encourage people to purchase in these areas is to provide large subsidies.
- The workforce in the furniture and textile industries are graying and a younger population is needed.
- On average, about 14% of college students are homeless. Based on FAFSA data, above 20% of students had housing insecurity. 9% of Veterans at GTCC were in housing transition.
- There are a number of kids in transitional housing and food insecurity at the middle school. However, there are a number of kids that are “under the radar” and may be living with a relative in the area after previously being evicted.
- Penn-Griffin will bus people to keep them in school because moving schools hurts achievement.



City of High Point, North Carolina –
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Fair Housing – High Point Parks and Recreation
Tuesday, December 10, 2019 - 11:00 AM

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City of High Point, NC

2020-2024 Five Year Consolidated Plan & Analysis of Impediments

Fair Housing

Tuesday, December 10, 2019 at 11:00am

The following was discussed at the meeting:

- Many people with intellectual disabilities live off SSI benefits once they turn 18.
- The Justice Department has sued the State of North Carolina over group homes.
- Group homes are now mandated. Any new group home can have no more than three people. The ARC is being pushed toward independent living.
- The ARC owns more than 350 homes across the state of North Carolina with a focus on independent living and condos with some support.
- The numbers of people diagnosed with Autism exiting the school system is increasing dramatically. There is a great need for housing for people with Autism.
- People with non-developmental disabilities do not have available housing and are forced to get on the waiting list for the Housing Authority.
- Every year, Guilford County graduates between 200-250 individuals with a learning disability.
- The Realtors Association has brought in 40 new members and exposes them on Fair Housing requirements.
- There is a need for a series of training programs for Realtors.
- The State Board of Realtors does not require continuing education on fair housing training for members.
- Though there are Fair Housing electives for license maintenance, they are not required courses.
- Code of Ethics Training for the maintenance of memberships does include Fair Housing, but it is not periodic and it's a hourly requirement.
- Selling prices are often much higher than asking prices for market ready houses due to bidding wars.
- Housing inventory is extremely low. Population growth is natural and not due to annexation.
- Most of the new housing construction is at the upper price point.
- The City's Human Relations Department communicates and serves resources based on fair housing issues to act as a starting point for understanding the fair housing law and fair housing complaints.
- Human Relations is trying to do a better job of tracking the number of complaints. They serve as one of the options to file a State complaint, but a resident could contact the State correctly.
- Communications and Public Relations has tracked the number of Fair Housing complaints, and the number of complaints is in the single digits per year.
- There has been a perception that the number of reported fair housing cases is low, and many people mistakenly think that there is no issue.
- One of the goals of Human Relations is to educate and provide outreach.

- The Human Relations Department does not do investigations. HUD does a calculation for expected minimum case load, and the number of complaints can be much higher than the expected case load by magnitudes of 100,000.
- Because Fair Housing investigations can be very detailed and take up to 300 days, the number of people who go through the Human Relations Department cannot necessarily reflect the total fair housing complaints. Complainants can go through other avenues like a private attorney.
- There is a need to educate landlords, tenants, and elected officials.
- Human Relations has a staff that Council leans on to use as gatekeepers to investigate complaints.
- The Human Relations Commission offers a yearly training, often in conjunction with Community Development. The ARC will also bring the department in for training.
- Council does a Fair Housing Proclamation. Michael McNair is the Fair Housing Officer.
- There is an Annual Housing Symposium that Community Development holds.
- There is an uptick in fair housing complaints on the part of people with Mental Health issues.
- There can be instances of discrimination tied in with these issues and there are no safe places to immediately and directly support these people when they do have a complaint. As a result, the needs of these people can be left unaddressed.
- There are fair housing issues that come disguised as code enforcement issues.
- At times, there have been clear violations on the parts of City Planning and Zoning Boards, but there were no complaints against this violation.
- In Greensboro and Guilford County, group homes must be a minimum of 1 mile away from each other. This is a State Law and it must be adjudicated at the Court.
- Quid Pro Quo and Hostile Environment cases on the basis of sexual abuse are difficult to successfully prove and the courts have laid out a high standard, so victims do not frequently report them.
- Under Sex for the Fair Housing Act, there are also Domestic Violence provisions. People cannot be evicted for the three strike rule from police calls.
- It is especially difficult for people who do not drive to find a place to live on the bus line.



City of High Point, North Carolina –
FY 2020-2024 Five Year Consolidated Plan, FY 2020 Annual Action Plan, and
FY 2020 Analysis of Impediments to Fair Housing Choice
Health Care – High Point Parks and Recreation
Tuesday, December 10, 2019 – 1:30 PM

Name	Organization	Phone Number	Email Address
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City of High Point, NC

2020-2024 Five Year Consolidated Plan & Analysis of Impediments

Healthcare

Tuesday, December 10, 2019 at 1:30pm

The following was discussed at the meeting:

- The Healthy High Point Foundation (?) makes grants to nonprofits that do the work.
- Triad Health Project is the HIV/AIDS organization for the County, with offices in Greensboro and High Point. They provide case management, assistance, food, etc. There are 108 clients with active monthly contacts.
- The Triad Health Project Assistance program also assists about 30 people with food assistance.
- There are several hundred people in Guilford County living with HIV/AIDS. In Greensboro, there is more specific funding guided to the Cohon Health Foundation. Greensboro gets HOPWA funding and has additional case managers.
- The number of clients served in High Point in Greensboro are about equivalent and they receive vouchers.
- The number of people living with HIV/AIDS in NC, 1 in 7 haven't been diagnosed and part of Triad's goal is to find these people and get them into care.
- Triad does prevention work as well.
- HIV/AIDS also matters with housing, addiction, and homelessness issues, so there is a need for a triage approach to stabilize people and ensure that they are cared for.
- There is a communal space for people with HIV/AIDS in Greensboro and there is a great need for one in High Point.
- Triad has confidential testing at all of its sites and brings them to any site where it is invited.
- Wherever there is poverty, HIV/AIDS is increasing.
- The stigma that surrounds HIV/AIDS is also a barrier, where people will not share their status.
- There is a need to raise awareness and encourage training in the City. This is foundation funded.
- Over the last few years, undetectable HIV has become untransmittable HIV which makes it impossible to transfer sexually.
- Faith Health works out of the High Point Medical Center. They gather volunteers to support people and keep them as healthy as possible while they deal with other health issues.
- Faith Health has two "connectors" who receive a stipend for 8 hours/week for work, and then 9 volunteers. They get referrals from hospitals but will also work with the community.
- Faith Health is relatively new to High Point and has only been there since February. They have gotten 20 referrals and have 4-5 active referrals.
- The Greater High Point Food Alliance has 3 neighborhood organizations that are connected and Faith Health wants to partner with them for this work.
- Faith Health started in Winston-Salem at North Carolina Baptist Hospital. The High Point Hospital is now under Wake Forest Medical.
- Piedmont Health Services is a sickle cell agency and 49-year old community based organization that provides wraparound services for sickle cell disease. They also have a prevention counseling

and outreach program for HIV. They provide care for women pre-conception to when the infant is 18 years old and fathers which includes counseling.

- There are about 98 persons with sickle cell and 1,800 with sickle cell traits.
- Piedmont Health provides transportation for all clients regardless of program. Their main office is in Greensboro, but their High Point office is in the South Recreation Center.
- In North Carolina since 1984, they provide sickle cell screenings for newborns. Piedmont receives the results of this screening and can contact parents.
- Public transit between Greensboro and High Point does not connect, unless somebody wants to get to GTCC in Jamestown. People will struggle to get to health clinics through public transit.
- People are unable to use public transit to access healthcare if they lack the income to do so.
- The communal house in Greensboro will have off-hours for people that can come in.
- Rural people are also able to come to the communal house for HIV/AIDS education.
- There have been instances of employment discrimination based on HIV/AIDS but they are difficult to prove. Duke Legal Clinic has assisted with this.
- High Point has a 25-unit apartment complex designated for people with HIV/AIDS. It is almost always at capacity, though it has been opened up to all disabilities and prioritizes HIV/AIDS positive people now.
- People with sickle cell will be discharged based on not feeling pain, so this dictates whether they will stay regardless of whether they have somewhere to go. Also these people are frequently accused of being drug seekers and released.
- Things have improved for people with HIV/AIDS since Wake Forest took over.
- Many people go to the Emergency Room because the shelters are full and they nowhere to go.
- People are presenting at the HIV/AIDS providers because they do not want to be at a shelter but may have other issues such as bedbugs or mental health issues.
- There was previously a chaplain assigned to homeless people going through the system in other places and there is a need to implement this practice in High Point.
- There are patient assistance programs for large copays and the HMAP program for people making less than \$36,000 per year to get affordable medications to people who are HIV/AIDS positive.
- PREP is a preventative measure that makes it so people cannot get HIV/AIDS if exposed. Guilford County is now number 2 in North Carolina HIV/AIDS positive percent.
- The demographics of who is contracting HIV may change. It's currently people aged 16-29. People of color are also disproportionately more affected with behavior held constant.
- Partner Notification for HIV is the same as for syphilis, gonorrhea, and other STIs.
- Piedmont Health is also in the Guilford County jails treating people identified as positive.
- People will also stop at the Communal House out of prison. It is not a 24 hour facility. Higher Ground is the name of the facility.
- There is a Community Health Needs Assessment put together by the health systems in the County. There is also the High Point Resiliency Plan.



City of High Point, North Carolina –
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Homeless Services – High Point Parks and Recreation
Tuesday, December 10, 2019 – 2:30 PM

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City of High Point, NC

2020-2024 Five Year Consolidated Plan & Analysis of Impediments

Homeless Service Providers

Tuesday, December 10, 2019 at 2:30pm

The following was discussed at the meeting:

- Partners Ending Homelessness is the Collaborative Applicant for NC-504 which is Guilford County's CoC. They also manage HMIS for the County.
- PEH is preparing to launch Coordinated Entry. This is to get people to enter service programs and avoid entering mainstream services that do not assist them.
- There are multiple shelters in the area. There is a men's shelter and Veteran's transitional shelter run by Open Door Ministries.
- There are expanded beds for cold weather. This will be the first year of specific weather amnesty programs, where Mt. Zion will open its doors to men and West End Ministries will shelter women.
- Leslie's House currently has 22 beds and the Reform Church is also looking to expand this program for the winter.
- There is no drop-in or day shelter. Every time there are attempts to bring a drop-in shelter to the City, something happens to prevent it.
- Carrie Services has 6 beds in partnership with the VA. Salvation Army will be re-adding 10 beds.
- The Domestic Violence Shelter is Family Services of the Piedmont.
- David Miller is a downtown business owner and has previously chaired homeless services programs. He has previously chaired for services for boys aging out of foster care too.
- There is a transitional home for foster youth to finish high school and have types of support while they are vulnerable.
- At the boys shelter, boys are out during the day and then come back at night. They will spend time at the library during the day.
- There are a lot of mental health issues contributing to the homeless issues in the area. It is a big issue in public schools. There are not a lot of mental health services in the area.
- Violence at home and in the neighborhoods and substance abuse problems create issues for youth that may put them into homelessness.
- There is no shelter for girls aging out of foster care like there is for boys.
- There are 400-500 kids in foster care at any given time, and only about 50 are fostered in High Point at any given time compared with the 150 that are actually from High Point.
- Guilford County Schools considers about 1,400 kids homeless. Their definition of homelessness is broader than the HUD definition.
- The primary shelter of Open Doors is between two growing parts of the City and may be displaced. The issue with moving it will be NIMBYism but it must be close to downtown.
- Open Door does not focus on counseling or education and opportunities.

- Clarinda Crawford has experience with working with homeless populations but not in the area. Her experience in ministry has been working with the disadvantaged and will let people stay in her churches if it's cold.
- Her three churches are going to include a new community center with possible sheltering in the future.
- All three churches have significant ministries and are working with food insecurity.
- The three churches are in a formerly valuable area that was abandoned by businesses.
- Rapid Rehousing and Permanent Supportive Housing are both also conducted on the part of Open Door Ministries.
- There is a need to link housing and services so people can be stable and secure.
- There is a need for affordable housing.
- There is a need to share resources and ideas to begin providing wraparound care in the City.
- There are some groups that come together to discuss food issues and there is the Continuum of Care as well as the Resilience Group that began planning in April and continues to discuss social services in the City. There is also a Housing Coalition that meets regularly.
- There is a need for Rapid Rehousing coming out of hospitals.
- There is a disconnect between the City and the creation of new beds, as new beds require operating costs.
- It is unlikely that there are discharge plans. Unless there is somebody to pick up anyone discharged from hospitals or jails.
- The VA has been proactive about finding somebody a place to go, but no other entity has.
- There is a need for a day center, but the operating expenses cause it to be difficult to create it.
- The CoC does not have a good count on the number of rural homeless.
- There is some geographic diversity to the homeless population. The number of homeless people has stayed constant since about 1991 in spite of the growth of the City. Greensboro has not increased in capacity either.
- The County is focusing largely on chronic homeless and homeless Veterans, and they have been successful with reducing these numbers.
- Single women without children have no shelter targeted to them in the area.
- The day shelter in Greensboro has had challenges because the population there is not necessarily representative of the whole homeless population.
- The number of homeless women aged 35-55 has been increasing. This may be caused in part by drug abuse or prostitution.
- Dan Hodgson does outreach into the tent communities.
- There are many women in domestic violence situations that stay in this situation rather than becoming homeless.
- There is a need for a safe place for people to park with services near them. Both Wal-Mart and Sheetz are magnets for people living in their cars.



City of High Point, North Carolina –
 FY 2020-2024 Five Year Consolidated Plan, FY 2020 Annual Action Plan, and
 FY 2020 Analysis of Impediments to Fair Housing Choice
 Housing Providers – High Point Parks and Recreation
 Wednesday, December 11, 2019 – 9:00 AM

Name	Organization	Phone Number	Email Address
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Michelle V McNeil	CHP	(336) 883-3685	michelle.mcneil@highpointnc.gov
CHERYL BRANDBERG	CHS	(336) 419-6079	cbrandberg@chshousing.org
Caroline McKinley	Tried Lifesty	336-863-1970	Carolburnett2@AOL.com
Jane Jackson	CHP	336-883-3347	toni.jackson@highpointnc.gov
Nena Wilson	City of High Point	336-883-3351	Therena.Wilson@highpointnc.gov
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City of High Point, NC

2020-2024 Five Year Consolidated Plan & Analysis of Impediments

Housing Providers

Wednesday, December 11, 2019 at 9:00am

The following was discussed at the meeting:

- Community Housing Solutions does home repairs for low-income persons. They focus on the core city.
- There were 38 repairs in 2018, 45 repairs in 2019, and they plan to do 55 in 2020. Most of their clients are elderly and disabled.
- CHS builds about 2 infill type single family houses in the South Side of the City.
- CHS is a CHDO. New construction is funded with HOME but repairs are not.
- Many of the repairs done are aging in place modifications such as ramps and grab bars. Also repairs due to water damage.
- About 75% of CHS' clients are elderly or disabled.
- CHS' staff is trained in lead-based paint and are all lead-certified. They do not have trouble finding lead-based paint certified contractors, but most work is done through their own staff assisted by volunteers. Certain situations will require contractors.
- CHS' funding sources are foundations. The High Point Community Foundation assisted them previously. Area employers also partner with them.
- CHS services the entire County and get resources from the County and State as well.
- CHS has a waiting list. The number of people on the waiting list is over 100 for the County.
- Many of the repairs that they do in the core city of High Point are major repairs. Many of the houses in the City are in poor condition.
- CHS partners with different groups such as Senior Resources and Meals on Wheels to get referred. They will also get word-of-mouth referrals from neighbors talking.
- CHS will do up to \$20,000 worth of repairs, and partner with other companies if the repair end up costing more than anticipated.
- The program is free or very low cost. Their delinquency rate is low. They do not use liens and instead use promissory notes.
- Operation Inasmuch does no liens and it is a completely free program.
- Housing Consultants Group provides homebuyer education. They work with the City and Community to engage with volunteers for Operation Inasmuch.
- There are two tiers of homebuyer ed. There is an 8 hour class for downpayment assistance.
- There is also the IDA or Individual Account Development Program that is 16 hours long and teaches people good spending behaviors. This class historically looked at credit, but now looks at income and people are not making enough.
- The City has done a good job diversifying the income levels of neighborhoods, but there is a lack of supply of housing stock.
- There is a need for more housing developers and more new construction homes. There are vacant lots but there are no people to build on them.

- Housing Consultants Group is looking to become a CHDO.
- After the housing crisis, many of the affordable housing builders left.
- HCG does financial literacy and basic credit and spending behavior programs. This is targeted toward people who are not ready for the IDA program yet. This puts people on the path to homeownership and has been successful in Greensboro with plans to bring it to High Point.
- There is a lack of realtors who understand affordable housing.
- There is a lack of lenders who understand affordable housing and financial layering.
- The South Side of the City has challenges that the City has been trying to overcome, but they need assistance from appraisers.
- HCG talks about fire extinguishers and toolboxes.
- HCG encourages homebuyers to be there for the inspections, especially first gen homebuyers.
- HCG also does post-purchase classes, and they hold these off until people have purchased their home. They require homebuyers to come to this course at least 12 months after purchase.
- They serve many single female head of households for homebuying.
- There have not been many disreputable contractors taking advantage of people.
- Elderly people typically have a family member that will assist them with home repairs.
- There is a need to create better connections with local community colleges to help people elevate their incomes.
- Living wage in the City is \$18/hour. This is true for the County overall as well.
- There is a need for additional estate planning for new homeowners and this is being incorporated into classes as well.
- Many people with low homeownership experience see the advantage of homeowner warranties.
- Many first time homeowners are paying about 75% less for their mortgage than they are for their rent.
- Tiny House Community Development is a newer nonprofit (6 years old) and they are 98% volunteer-based.
- High Point has been a trendsetter in North Carolina for affordable housing and they adopted the first official tiny house community.
- Tiny house communities utilize gardens, playgrounds, and other ways to build communities.
- Tiny House Community Development depends on fundraising. They strive to create developments without debt financing so they can charge below HUD FMR for rents.
- THCD rents to chronic homeless or formerly homeless. They collaborate with multiple agencies through the CoC.
- There is a need for community collaboration and engagement. There is also the need to incentivize affordable housing development. These people do not receive the same incentives as businesses that anticipate hiring in the area.
- Waiving connection fees or downpayments can be useful to incentivize affordable housing construction for people at the 0-30% AMI bracket. There is a high need for housing for them.
- There is a need to engage community partners, including corporate partners, to create volunteer opportunities.
- Unless there is the construction of an entire subdivision, developers will not come back because the profit is not necessarily there.

- In their Tiny Homes Community, they serve 2 Veterans and 4 other people that had experienced chronic homelessness at some points in their lives. This project is in Greensboro.
- There is a need to provide additional gap financing (often an additional 20%) that will encourage the development of affordable housing.
- The first Tiny House project did not coordinate with City Council, but Tiny Homes Community is encouraged to contact council before the ordinance is approved.
- High Point's zoning codes provide opportunities for accessory dwelling units.
- There is a need for first time homebuyers to utilize accessory dwelling units.
- For first time homeowners, there is also a need for educating people who may rent out these accessory dwelling units.
- Appraisals come in low in Burns Hill and the South Side because there is not a track record of successful new construction in those areas.
- There is a need to develop 3-4 houses to use as comps to raise the appraisals.
- Triad Lifestyle Realty works with first time homebuyers. Most realtors do not work with these people because of the lower commissions.
- Fair Housing Training for realtors is a part of the ethics training. To get licensed, fair housing training is required and it is required for leadership every 2 years.
- Fair housing is a big part of the realtors' code of ethics.
- Redlining has been on the rise with code words and realtors are using them.
- Testers are active in all communities in the state of North Carolina.
- There have been instances of racial steering on the part of realtors in the area, including with relocations based on the expansion of High Point University.
- There is a need for mixed-income developments in neighborhoods in High Point.
- There is still NIMBYism in the area and residents will fight affordable housing.
- It is often more difficult to get new affordable housing sold rather than built due to neighborhood stigma.
- City Council and the City Management Team will do volunteer work on Operation Inasmuch.
- High Point's tax rate is higher than neighboring areas because of previous disinvestment. They try to generate revenue through base growth.
- The walls are going up around High Point University. The University is trying to keep students in and keep every amenity on campus. This is to market to parents as students have more mixed opinions according to focus groups.
- Habitat has another dedication coming this Saturday and they are running out of land. Habitat has not done construction in mixed areas of the City yet.
- Habitat builds about 16 houses per year. They also have assistance from NCHFA.
- Residents of the housing authority did not know they had the opportunity to engage in the self-sufficiency program.
- It is important to focus on the number of aging adults in low-income areas. There is a need to assist aging populations with aging in place.
- There is a need to encourage the purchase of homeowner's insurance even after the home is paid for.
- There are a large number of homes without handrails.



City of High Point, North Carolina –
 FY 2020-2024 Five Year Consolidated Plan, FY 2020 Annual Action Plan, and
 FY 2020 Analysis of Impediments to Fair Housing Choice
 Housing Authority – High Point Parks and Recreation
 Wednesday, December 11, 2019 – 11:00 AM

Name	Organization	Phone Number	Email Address
Angela McGill	HPHA	336-888-2375	amegill@hpha.net
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Nena Wilson	City of High Point	336-883-3351	nena.wilson@highpointnc.gov
Brandon Wilson	Urban Design Ventures	412-461-6916	brandon@urbandesignventures.com
Walt Haglund	Urban Design Ventures	(412) 461-6916	walt@urbandesignventures.com

City of High Point, NC

2020-2024 Five Year Consolidated Plan & Analysis of Impediments

Housing Authority

Wednesday, December 11, 2019 at 11:00am

The following was discussed at the meeting:

- The Housing Authority has increased their voucher allocation with the relocation of Daniel Brooks. They received 75 more mainstream vouchers. They have 218 tenant protection vouchers. They anticipate 28 additional vouchers at a later date.
- There are a total of 321 new vouchers, but the challenge is finding housing that passes the HQS.
- The majority of people relocated are picking public housing. Anything not used in the relocation is issued to the voucher waiting list.
- They anticipate that at least half of the vouchers are not going to be issued to the waiting list.
- There is a need for more affordable housing that can accept vouchers.
- There is a need for project-based vouchers. They can set aside up to 20% of their vouchers for project-based housing.
- One-bedrooms and three-bedrooms are the greatest needs. They also have large families on the waiting list.
- They need to make sure that if landlords would like to rent to Section 8, they need to put themselves on social service lists.
- The biggest challenge is finding decent, affordable housing within payment standards.
- There is a need for higher paying jobs so that tenants can afford the rents.
- Fair Market Rents in the City are high.
- They have 1,146 public housing units.
- They have 1,519 plus 321 vouchers, meaning 1,840.
- Daniel Brooks is going to be demolished. There are three different AMP units. Daniel Brooks is 216 units and it's the core. They will tear down two adjacent units that are Scattered Sites that are duplexes. Also 28 units from the Daniel Brooks Annex across the street which totals 246 units.
- They will end up with 264 units back on the market in a three-phase development. Phase I is 4% non-compete with 100 units through the City bond. The project is adjacent to High Point University and has generated excitement.
- A police substation was built for HPU but it was put in the middle of the Habitat community.
- Phase II and Phase III will be a remaining 80 units apiece. No site has been identified yet. They will be LIHTC projects and 9% tax credits.
- There is a return policy for people relocated for the new replacement development. It will be a working community and people living there must be working 30+ hours per week. They must sign up for the FSS program, but elderly and disabled are exempt from this. This location will be managed third party through a developer. The vouchers for this development are not project-based. All of this development will take place on the former Daniel Brooks site.

- Clara Cox was replaced with Park Terrace. There are 250 units there that are LIHTC and it was three phase development. There were two 9% tax credits and one 4%.
- There are baseline requirements for FSS including financial literacy and having families provide five goals. They provide case management to get through the project. They get to use escrow accounts and that's an incentive.
- They are a HUD-certified housing counseling agency so they provide both to residents and the City, pre- and post-homeownership and have a first time homebuyer program.
- They started a youth financial literacy program that is also open to the community. They've had 100 kids go through the program aged 15-18.
- They try to have kids encourage parents and parents encourage kids to take part in financial literacy programs.
- They are at the baseline 5% for disabled units. They will do reasonable accommodations and they have a request form process for tenants. They typically do not turn people down for paperwork.
- They have a Section 8 new construction for elderly high rise.
- They have community resident councils. Because of low attendance, they do this through an executive round table where they meet with Angela personally. Community meetings also happen but these have lower attendance. They are done every quarter and as-needed.
- They have a potential RAD conversion for the redevelopment project of 28 units for the Daniel Brooks Annex. They have received CHAP and are working on approval and the financing plan.
- They are a standard performer rating. They are typically high performer but were downgraded this year for a reason that is unknown. They have responded by doing a comprehensive inspection and doing floor-to-ceiling repairs.
- The Section 8 Waiting List has been closed for the last few years with a 30 day opening period and they receive 800-1,000 applicants during that period.
- They do not have a high turnover rate on their public housing or vouchers so they must provide people with other resources. The waitlist can be months to years long.
- They refer them to Social Serve where all of the properties are listed.
- They have PHA Pay in most apartments for utilities. They also have a program where people can choose between flat rent or 30% adjusted. In this Upward Mobility Program, people pay their own utilities. People are afraid to move out because if they lose their job they know they will be secure.
- There are excess utility charges that go back to tenants if they go over allowed consumption.
- They do not have many evictions for drugs or crime anymore. The Housing Authority pays for police officers in the Housing Developments. The officers hired there are involved in programs and services for the residents.
- The waiting list for public housing works the same as the Section 8, and with the relocations, units are leased within 5 days.
- There is a need to put pressure on out-of-state landlords so they can sell the property and fix them up.
- There is not a large number of port-ins and port-outs, but there are more port-ins.
- Public transit is one of the biggest hindrances for public housing families. People with children have to balance paying childcare and transportation and their rent also goes up.

- Any family that applies simply needs to stop in when the waiting list opens and provide required documentation. There is no drug testing and the criminal background checks are not done until the person comes up on the waiting list.
- In Housing Authority policies, based on the type of criminal activity that comes up are between 3-7 years. The only crimes that are not allowed are sex offenders methamphetamine production.
- HUD mandated that all public housing authorities are smoke free. By policy, they are a 100% smoke free campus though this cannot be proven within people's houses.
- They have not received any formal fair housing complaints.
- The Mayor appoints board members of the Housing Authority with the consent of council.

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City of High Point, North Carolina –
FY 2020-2024 Five Year Consolidated Plan, FY 2020 Annual Action Plan, and
FY 2020 Analysis of Impediments to Fair Housing Choice
Community-Based Organizations – High Point Parks and Recreation
Wednesday, December 11, 2019 – 1:30 PM

Name	Organization	Phone Number	Email Address
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Jakki Davis	WSNA	336-383-6048	jdavis@itstime2dup.com
Johnnie Lofton Sr.	MECEDONIA	336 405-8040	loftonj36@gmail.com
Meredith Green	CHP	336-883-2684	Meredith.greene@highpointnc.gov
Alisha Duler	CHP	336 883-4014	Alisha.duler@highpointnc.gov
Dalton Lucas	West End / HP	540-206-7330	Dlucas1@Highpoint.edu
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Brandon Wilson	Urban Design Ventures	412-461-6916	brandon@urbandesignventures.com
Walt Hasbani	Urban Design		

City of High Point, NC

2020-2024 Five Year Consolidated Plan & Analysis of Impediments

Community-Based Organizations

Wednesday, December 11, 2019 at 1:30pm

The following was discussed at the meeting:

- Washington Street Neighborhood Association would like to see the speeding the neighborhood to be addressed. There is a need for speed bumps. There are many kids in the neighborhood that are in danger.
- There is a need for more businesses on Washington Street.
- There is a need for more activities for children, and mentorship opportunities.
- There is a need to house the veterans and the homeless and to find jobs for them.
- There is a need for higher wages. The minimum wage is too low.
- The business district in Washington Street should provide jobs that provide wages that are higher than the minimum wage.
- All of these needs are compounded for people with children.
- There is a need for affordable health care in the City, especially for families with children.
- In the Macedonia Neighborhood, there is a need for public transit. Many people with minimum wage jobs are forced to walk. This can also lead to workers calling off sick which is detrimental to wage workers.
- People in the Macedonia Neighborhood that do not speak English need assistance. There are policemen that do not speak these languages.
- There is a need for interpreters and English as a Second Language education.
- There is a need for the police to be present when crime is not going on. There is a need for improved relationships between the police and residents. Police largely just drive through the neighborhood and do not interact.
- There is a need for opportunities for mentorships and learning between generations.
- There is high crime in Washington Street's zip code but also poverty which leads to the crime.
- Education in the ZIP code is lacking and people will not be able to get livable wage jobs.
- There are people who are afraid to leave their house in the neighborhood because of crime.
- There is a need for churches to educate the children in their congregations.
- There is a need to give children more opportunities, not just team sports. There is the potential to teach children about gardening or trades where they work with their hands.
- There is a need to change policies to allow for less food waste.
- There is a need for job training for people that will not go to college.
- The High Point Museum has been working on a historical district for the Haley Historical District.
- There is no grocery store in the immediate area of the Haley District. A dollar store is the only place to get food in the immediate area.
- The Greenway backs up behind the museum and along the middle school and high school. Students will be on the greenway when they are in school and there is a need for some policing in that area.

- There are areas where the bushes are into the street, and the City needs to take care of some of this blight along with the other blight they are working on.
- There is a need for access to quality food, such as fresh fruits and fresh vegetables. Food insecurity shows itself most when public transit shuts down at 6pm.
- There is a need for improved education systems to address school disparities.
- The County School System is beginning some tutoring programs.
- The Burns Hill Neighborhood needs more economic development. The Green Street corridor has lost most of its core businesses.
- There is a need for more police engagement in Burns Hill as well as along Washington Street.
- There is a need for more speed bumps in the Burns Hill neighborhood.
- There is a need to distinguish the types of crimes in certain places, because high crime areas are not equivalent and they create a stigma.
- People conflate affordable housing and Section 8 housing. There is a need to educate people on the benefits of affordable housing.
- Oftentimes, landlords are not fixing up housing for people in neighborhoods like Washington Street.
- When the affordable housing development on Skee Club was coming up, there were people that explicitly and in coded language expressed that they did not want the development because it would change the racial makeup of the neighborhood.
- There is a need to address homelessness in the area, either with another shelter, a day shelter, or job and self-sufficiency training.

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City of High Point, North Carolina –
 FY 2020-2024 Five Year Consolidated Plan, FY 2020 Annual Action Plan, and
 FY 2020 Analysis of Impediments to Fair Housing Choice
 Social Services – High Point Parks and Recreation
 Wednesday, December 11, 2019 – 2:30 PM

Name	Organization	Phone Number	Email Address
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Teresa Hinkle	Camping Services, Inc.	334-880-5594	thinkercampingservices.org
Catherine Johnson	Gulford County FSC	336-641-7233	cjohnso5@gulfordcounty.nc.gov
Donna McCormick	Sandhills Center/IME/mco	910-673-7229	dnam@sandhillcenter.org
Carl Vining	Greater High Point Food Alliance	336-899-6855	carl.vining@ghfa.org
Christie Hyman - Shine	CHP P&R Roy B. Oulter Sem. Ct.	336-883-3584	christie.shine@highpointnc.gov
Carla Carpenter	Sandhills Center	910-673-3325	carlac@sandhillscenre.org
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City of High Point, North Carolina –
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Social Services – High Point Parks and Recreation
Wednesday, December 11, 2019 – 2:30 PM

Name	Organization	Phone Number	Email Address
Charlene Gladney	Operation Xcel	336-338-3384	cgladney@operationxcel.org
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Dorothy Durr	Sw Kivaas HPOC	336-777-5130	dorothy@kivaas.com
Ellen White	Semi Recovery of High Point	336-373-4814	director@senior-resources-guilford.org
Maura Mayorga	YWCA HP	336-882-4126	mmayorga@ywcahp.com
Brandon Wilson	Urban Design Ventures	478-461-6916	brandon@urbandedesignventures.com
Michael E. McNa	C+H	336-883-3672	Michael.McNa@highpointnc.com
Nena Wilson	City of High Point	336-883-3357	Thavenna.Wilson@highpointnc.gov
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City of High Point, NC

2020-2024 Five Year Consolidated Plan & Analysis of Impediments

Social Services

Wednesday, December 11, 2019 at 2:30pm

The following was discussed at the meeting:

- High Point's Senior Center will be developing a new site between 3-5 years from now. They do not know the location of the senior center yet but it must be on a bus line.
- The senior center provides programming and services, including daily activities, educational programs, meal vouchers which is associated at Senior Resources of Guilford County (housed in the center), Medicare and insurance, and legal aid assistance. All are free of costs.
- Children's Initiatives of United Way of Greater High Point and the High Point Opportunity Center. Both are part of Guilford Child Development which runs all of the early childhood and head start programs.
- Children's Initiatives works with the Resiliency Committee.
- Guilford County Family Justice Center is a collaborative of 12 organizations to work with victims of domestic violence, human trafficking, elder abuse, etc. This is a variety of services in one location and the High Point office has been open for one year.
- There is a need for more permanent services including housing for victims.
- Services provided include safety planning, civil and legal services, social services, etc.
- There is an increase in the number of people evicted for domestic violence in High Point.
- They have seen about 3,500 people in the High Point office over the course of their first year.
- Caring Services works to treat people with substance abuse disorders and also provides transitional housing. One of their main goals is to bring people to self-sufficiency. They have 108 transitional beds.
- Triad Adult Daycare Center is contracted with Sandhills to use Medicaid State Funds to allow people to attend their program. They provide services and experiences to maximize remaining skills and independence for people with development disabilities and their families.
- The Adult Daycare has two apartment sites for people once they leave the daycare program. They provide a variety of activities.
- Triad Adult Daycare provides complete social services, including any physical assistance.
- In addition the services for the developmentally disabled, there are classes for students that were no longer in school.
- The Greater High Point Food Alliance works on the issue of food insecurity. They work with food access in Burns Hill, Highland Mills, West End, and Washington Street. They have worked to change policies in the City to make it more urban garden friendly than the past.
- Mental Health Services of the Triad provides mental health services to adults in the area. They run several programs including a day program and psych-social rehab for adults with severe mental illness. They require a primary diagnosis and an MD order.

- Mental Health Services' fastest growing program is their court services program, which sends a licensed therapist into the jail to treat them. They served over 1,000 people in those three services last year and have added a certified addiction counselor.
- The number of people Mental Health Services' works with increases every year and problems become more complicated.
- Sandhills Center is a behavioral health provider agency that serves 9 counties. They work to transition people to community living and are responsible for providing transitional housing for Severe Persistent Mental Illness population. Their population with no income has increased.
- Sandhills is frequently seeking landlords for affordable housing.
- Sandhills is a member of several CoCs. There is a need for SOAR (?) workers to fill out applications to help people get incomes.
- There is a need for improved public transit for people with mental illnesses.
- Sandhills Center has offered opportunities to train providers working with their clients on fair housing so they understand the fair housing law as it relates to this tenant population.
- Sandhills Center serves approximately 100 in Guilford County.
- Southwest Renewal is a nonprofit Community Development organization. They work on the Southwest quadrant of the core City. 80% of the core City is in poverty and the southwest quadrant is in the 4th poorest ZIP code in the state. It is also a certified Opportunity Zone.
- The group is working on a trees for trash program and environmental conservation projects.
- The Southwest Quadrant was historically the industrial area of the City. They have 11 historic factories and mills which have attracted the small-scale manufacturing plan.
- There is a need for a multimodal interconnector in the Southwest Section that is also connected to the Northwest section of the City.
- Operation Xcel is also involved in the Resilience work group. High Point has the most food insecurity of all of their sites and the parents have the most transitional housing.
- Public transportation is a major need for students. Xcel provides transportation, as the students will frequently need to use Uber.
- Operation Xcel serves 60 students but there are requests for two more sites in High Point. There is currently a ratio of 1 adult to every 11 students.
- Senior Resources of Guilford provides a continuum of services for independent living for older adults. Their Senior Line program allows seniors to ask for assistance and information on nutritional programs. They run Meals on Wheels for the County and deliver to over 700 people in the County.
- There are 7 community nutrition sites in the County. Seniors that would like to get out have activities and socialization. They offer an "Adopt a Grandparent" program and the Senior Health Insurance Plan program. They also provide medical transportation and serve between 12,000-13,000 seniors every year.
- Senior Resources contracts with Sandhills.
- Senior Resources works with older refugees to learn English and gain citizenship.
- Exceptional children frequently get HS certificates instead of HS diplomas once they complete 12th grade. There is a need for a training facility for these types of students.
- There is a need for skills trainings for exceptional children. Many of these students may have incarcerated parents.

- Job training programs through the ARC is limited in funding.
- Public transportation is a major need.
- There is a need for affordable housing that is on the bus lines.
- There is a need for employment on the bus lines during shifts that are available.
- Much of the transitional housing is transitional and people move between transitional housing locations. This makes it difficult to do long-term case management.
- The Southwest Quadrant is create a multimodal transit system to feed into the major transit systems like the local bus terminal, the passenger train, and the passenger bus terminal.
- There are many chronic diseases in the Southwest Quadrant like diabetes.
- There is a need for more public recreation in public parks that provide the options for exercise.
- Urban greenways can act as both economic development tools and health tools.
- There is an opportunity to turn railway beds into greenways.
- High Point has a series of health issues. Transportation is one of its biggest barriers to healthcare. Many of the major health services are in Greensboro.
- There are seven food deserts within High Point. They are also healthcare deserts.
- There is a need for a day center for the homeless in the City.
- The Women's Shelter is at capacity. So is the Salvation Army's.
- Many of the homeless population in the City of High Point have additional issues with mental health and drugs.
- The best location for a day center is in a space where nobody wants it.
- A new healthcare provider in Greensboro and High Point called City Block allows people to sleep in the lobby if it is needed.
- High Point only has one library. There is the potential to investigate satellite libraries.
- The rules for the local paratransit have changed. The cost for paratransit has gone up and there is now a waiting list.
- There are 111 languages spoken in the Guilford County School System. There is a large immigrant population.
- World Relief brings a refugee resettlement population. The immigrant and resettled population has moved in as well for cost of living.
- There are many people without permanent addresses that miss mail notifying them about something important.
- Paratransit is no longer age-eligible and transportation for the elderly has become a greater challenge. This also applies to the mentally ill.
- There is a need for affordable housing, particularly in the core city.
- There is a need for a living wage. Many of the people who come to the food pantries are employed.
- The demand for services has increased while the resources provided have remained the same.
- There is a need for multimodal transit downtown and in the entire core city.
- Many people in transitional housing will frequently say they need to choose between their medication and another major payment, or rent and another major payment. There is a large need for affordable housing to help people feel secure.
- The North Carolina Poverty Research Fund is coming out with a paper on food security in High Point that will feature many statistics on poverty.

- There is no drop-in site that is a 24/7 service for people with mental health issues without traveling to Greensboro.
- A large number of hospital beds are occupied by people with mental health issues in the City of High Point because it is where people with issues are defaulted. This is the most expensive level of care. Jail is the second most expensive level of care and the most ineffective.

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B. Appendix B – Resident Surveys and Agency Surveys

Attached are copies and summaries of the following surveys:

- Residential Survey
- Agency Survey
- Survey Results

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**CITY OF HIGH POINT, NORTH CAROLINA
COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) AND
HOME INVESTMENT PARTNERSHIP (HOME) PROGRAMS
AGENCIES/ORGANIZATIONS NEEDS SURVEY**

Name of Agency/Organization:

Address:

Name:

Title:

Phone:

E-Mail:

Description of programs/services your agency provides: (Attach any brochures)

Does your organization provide any services or programs for the following?

- | | | |
|--|---|--|
| <input type="checkbox"/> Social/Human Services | <input type="checkbox"/> Housing | <input type="checkbox"/> Planning |
| <input type="checkbox"/> Community Development | <input type="checkbox"/> Economic Development | <input type="checkbox"/> Business Loans |
| <input type="checkbox"/> Job Training | <input type="checkbox"/> Public Health | <input type="checkbox"/> Justice/Corrections |
| <input type="checkbox"/> Policy Research | <input type="checkbox"/> Advocacy | <input type="checkbox"/> Other: _____ |

Please respond to the following questions if they apply to your agency or organization.

The clientele your program(s) serve?

- | | | |
|---|---|-----------------------------------|
| <input type="checkbox"/> Low Income | <input type="checkbox"/> Immigrants | <input type="checkbox"/> Families |
| <input type="checkbox"/> Incarcerated Individuals | <input type="checkbox"/> Disabled | <input type="checkbox"/> Elderly |
| <input type="checkbox"/> Communities | <input type="checkbox"/> Children/Youth | <input type="checkbox"/> Homeless |
| <input type="checkbox"/> LGBTQIA | <input type="checkbox"/> Other: _____ | |

What are the unmet community and economic development needs in the City?

What are the unmet housing needs in the City?

What are the unmet social service needs in the City?

Are there any Fair Housing issues in the City?

**Does your organization have plans to add new or expand existing programming?
In what ways?**

Other Comments/Suggestions:

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CITY OF HIGH POINT, NORTH CAROLINA – CONFIDENTIAL RESIDENT QUESTIONNAIRE

The City of High Point, North Carolina is conducting a survey to identify residents' needs in the community and fair housing concerns, such as acts of discrimination or barriers that might limit the housing choices of families and individuals. This survey will help the city prepare its Five-Year Consolidated Plan, Annual Action Plan and its Analysis of Impediments to Fair Housing Choice. Please take a few minutes and complete this **confidential questionnaire**. When completed, please return the survey to the **High Point Community Development & Housing Department, 211 S. Hamilton Street, Room 312, High Point, NC 27260**. The City would appreciate your response by **January 31, 2020**.

1. **Identify housing/rental issues in the City of High Point (Choose all that apply):**
 Affordability Minor Rehabilitation Major Rehabilitation Code Enforcement ADA Accessibility
 Historic Preservation Negligent Landlords Asbestos/Mold Lead Paint/Pipes Other _____
 2. **Identify any needs or improvements to parks/recreational facilities. (Choose all that apply):**
 Playground Equipment Benches & Picnic Tables Basketball Courts Tennis Courts
 ADA Surfacing ADA Equipment Open Grass Fields Splash Pads Pools Skateparks
 Walking/Biking Trails Ice Skating Other _____
 3. **Are there any problems in your neighborhood with the following (choose all that apply):**
 Streets Curbs/Sidewalks Handicap Access Parking Flooding Traffic Storm Sewers
 Sanitary Sewers Litter Property Maintenance Public Safety Crime Other _____
 4. **Identify any crime issues within the City of High Point.** Theft Drugs Violent Crime Gangs
 Domestic Violence Graffiti Vandalism Loitering Sexual assault Hate Crimes
 Other _____
 5. **Do you use any of the social services programs available in the City? (Choose all that apply)**
 Medical Mental health Homeless Senior Services Legal Addiction Employment
 Disabled Youth services Education/Job Training Food Access Warming shelters
 Childcare Immigrant LGBTQIA None Other _____
 6. **Are there any programs or services that are missing or under-funded in the City? Please list:**

 7. **Identify any employment issues in the City of High Point (Choose all that apply):**
 Lack of Job Opportunities Discriminatory Practices Lack of Job Training Legal Barriers
 Lack of Accommodation Lack of Childcare Lack of Transportation Other _____
 8. **Identify transportation issues in the City of High Point (Choose all that apply):**
 Not Reliable Public Transit Not enough service hours Cost of service Disconnected routes
 Unsafe public transit Bike routes/lanes Lack of Parking Walkability Other _____
 9. **Identify any blight (clearance/demolitions) issues in the City of High Point? (Choose all that apply):**
 Open Dumping Grounds Uncut Lawns Vacant Lots Squatting Vacant Commercial
Structures Vacant Residential Buildings Fire Risk Pest Control Site Pollution Other: _____
- Fair Housing impediments include any act of discrimination or barrier that limits the housing choices of families and individuals. The Fair Housing Act protects people from discrimination based on race, color, national origin, religion, sex, familial status or disability, when they are renting or buying a home, getting a mortgage, seeking housing assistance, or engaging in other housing-related activities.**
10. **In your opinion, are residents of the City of High Point aware of how to report fair housing violations?**
 Yes No Unsure **To whom should you report?** _____

(Turn Over to Complete)

11. **Identify the reasons why fair housing complaints may not be reported? (Choose all that apply):**
 Fear Retaliation Don't know how Reporting process Distrust of process Other: _____
12. **If you are a renter, has your landlord refused to make a reasonable accommodations for a disability?**
 Yes No **If 'Yes' what was the request?** _____
13. **Have you faced housing discrimination based on any of these characteristics? (Check all that apply):**
 Race Color National Origin Religion Sex Familial Status Disability
 Gender Identity Source of Income Sexual Orientation Transgender Status Other: _____
14. **Please evaluate whether the following situations result in further discriminations and/or barriers to fair housing in the City of High Point:**

	Strongly Agree	Agree	Neutral/ Unsure	Disagree	Strongly Disagree
State or Local laws and policies that limit housing choice	<input type="checkbox"/>				
Lack of fair housing organizations in the City	<input type="checkbox"/>				
Lack of knowledge among bankers/lenders regarding fair housing	<input type="checkbox"/>				
Lack of knowledge among landlords and property managers regarding fair housing	<input type="checkbox"/>				
Lack of knowledge among real estate agents regarding fair housing	<input type="checkbox"/>				
Lack of knowledge among residents regarding fair housing	<input type="checkbox"/>				
Lack of accessible housing for persons with disabilities	<input type="checkbox"/>				
Lack of accessibility in neighborhoods (i.e. curb cuts)	<input type="checkbox"/>				
Lack of fair housing education	<input type="checkbox"/>				
Lack of affordable housing in certain areas	<input type="checkbox"/>				
Concentration of subsidized housing in certain neighborhoods	<input type="checkbox"/>				
Other barriers	<input type="checkbox"/>				

15. **Are there any additional comments or concerns that you wish to share?**
- _____
- _____
- _____

Please take a minute to tell us about yourself:

16. **What is your street name and ZIP Code where you live in the City of High Point?**
 Street Name: _____ ZIP Code: _____ Neighborhood: _____
17. **Gender:** Male Female Non-binary/Gender Queer Gender non-conforming
 Gender Expansive Describe: _____
18. **Race/Ethnicity (choose all that apply):** White Black or African-American Native Hawaiian/
 Pacific Islander Asian American Indian/Alaskan Native Another Race Two or more Races
19. **Ethnicity:** Hispanic or Latino Not Hispanic or Latino
20. **Age:** 17 or younger 18-20 21-29 30-39 40-49 50-59 60 or older
21. **Number of persons living in your household?** One Two Three Four Five Six +
22. **Based on the number of persons living in your household check whether you are over or under the listed income?**

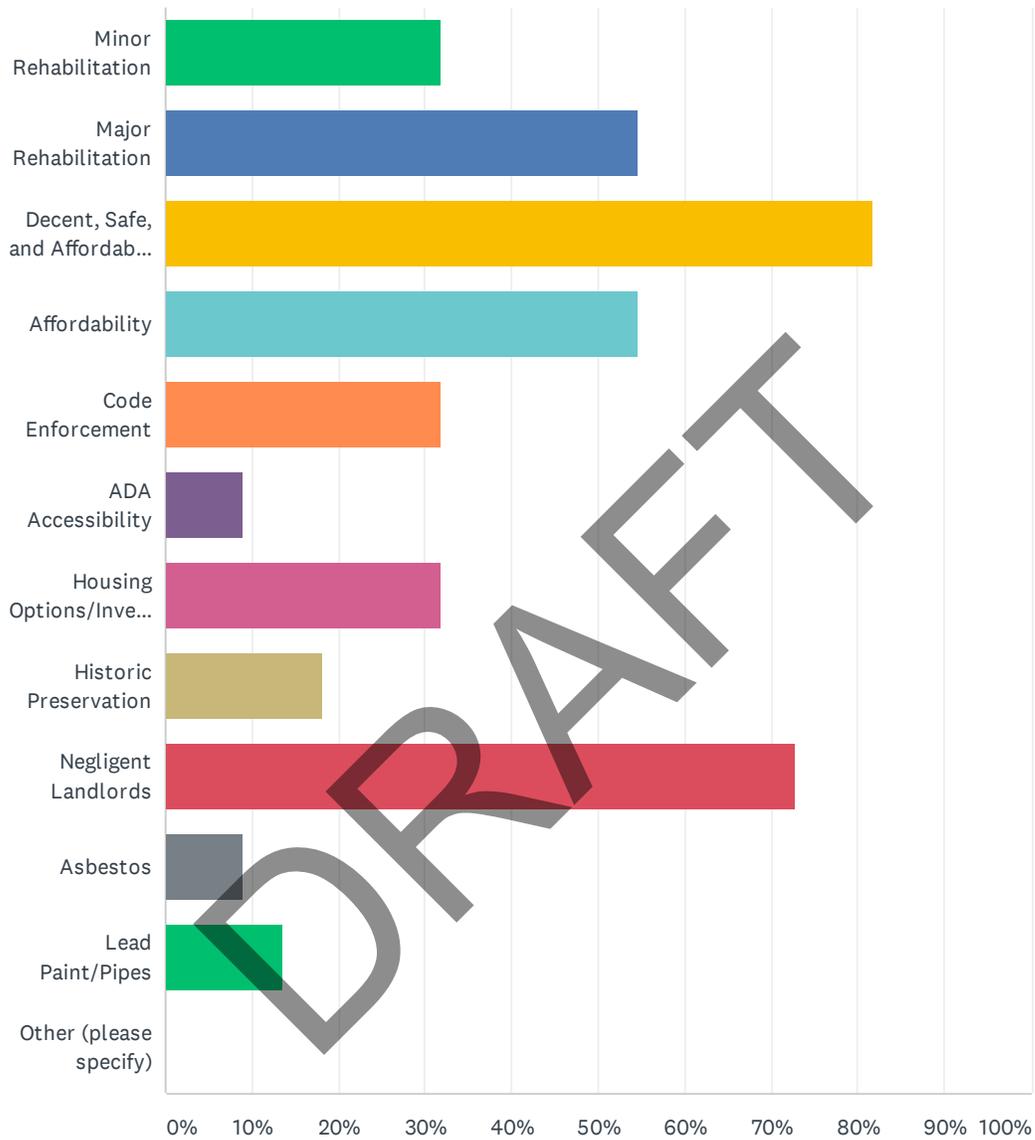
1 person household	<input type="checkbox"/> Over or <input type="checkbox"/> Under \$33,900	4 person household	<input type="checkbox"/> Over or <input type="checkbox"/> Under \$48,400
2 person household	<input type="checkbox"/> Over or <input type="checkbox"/> Under \$38,750	5 person household	<input type="checkbox"/> Over or <input type="checkbox"/> Under \$52,300
3 person household	<input type="checkbox"/> Over or <input type="checkbox"/> Under \$43,600	6 person household	<input type="checkbox"/> Over or <input type="checkbox"/> Under \$56,150

23. **Choose your housing status:** Homeowner Renter Homeless Living with friends/relatives
 Temporary Shelter Hotel/Motel Mobile Home Vehicle Other: _____

(Turn Over to Complete)

Q1 Identify housing/rental issues in the City of High Point (Choose all that apply)

Answered: 22 Skipped: 6



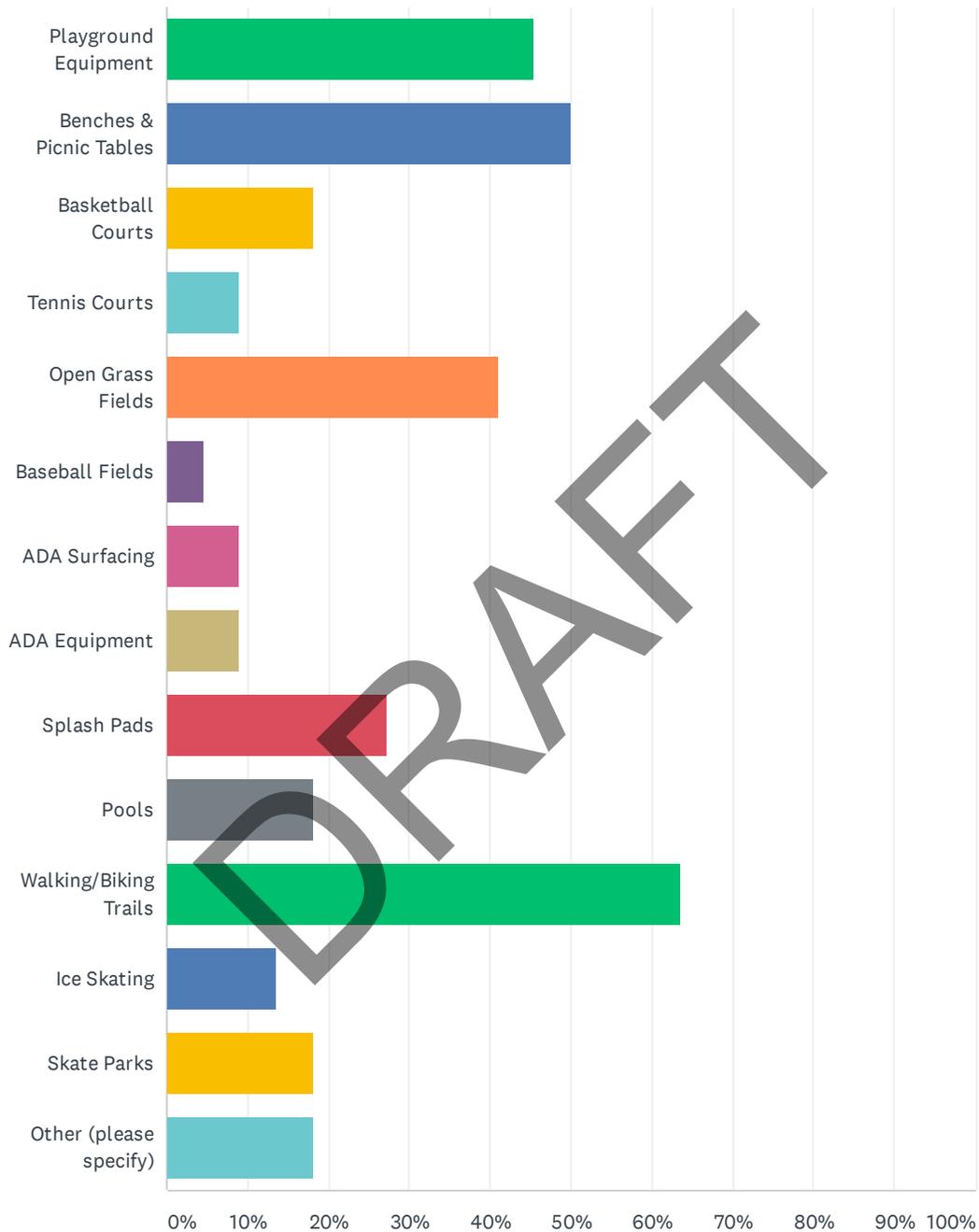
City of High Point, NC - Resident Survey

ANSWER CHOICES	RESPONSES	
Minor Rehabilitation	31.82%	7
Major Rehabilitation	54.55%	12
Decent, Safe, and Affordable Rental Units	81.82%	18
Affordability	54.55%	12
Code Enforcement	31.82%	7
ADA Accessibility	9.09%	2
Housing Options/Inventory	31.82%	7
Historic Preservation	18.18%	4
Negligent Landlords	72.73%	16
Asbestos	9.09%	2
Lead Paint/Pipes	13.64%	3
Other (please specify)	0.00%	0
Total Respondents: 22		

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Q2 Are there any needs or improvements to recreational facilities that you would like to see? (Please check all applicable boxes):

Answered: 22 Skipped: 6



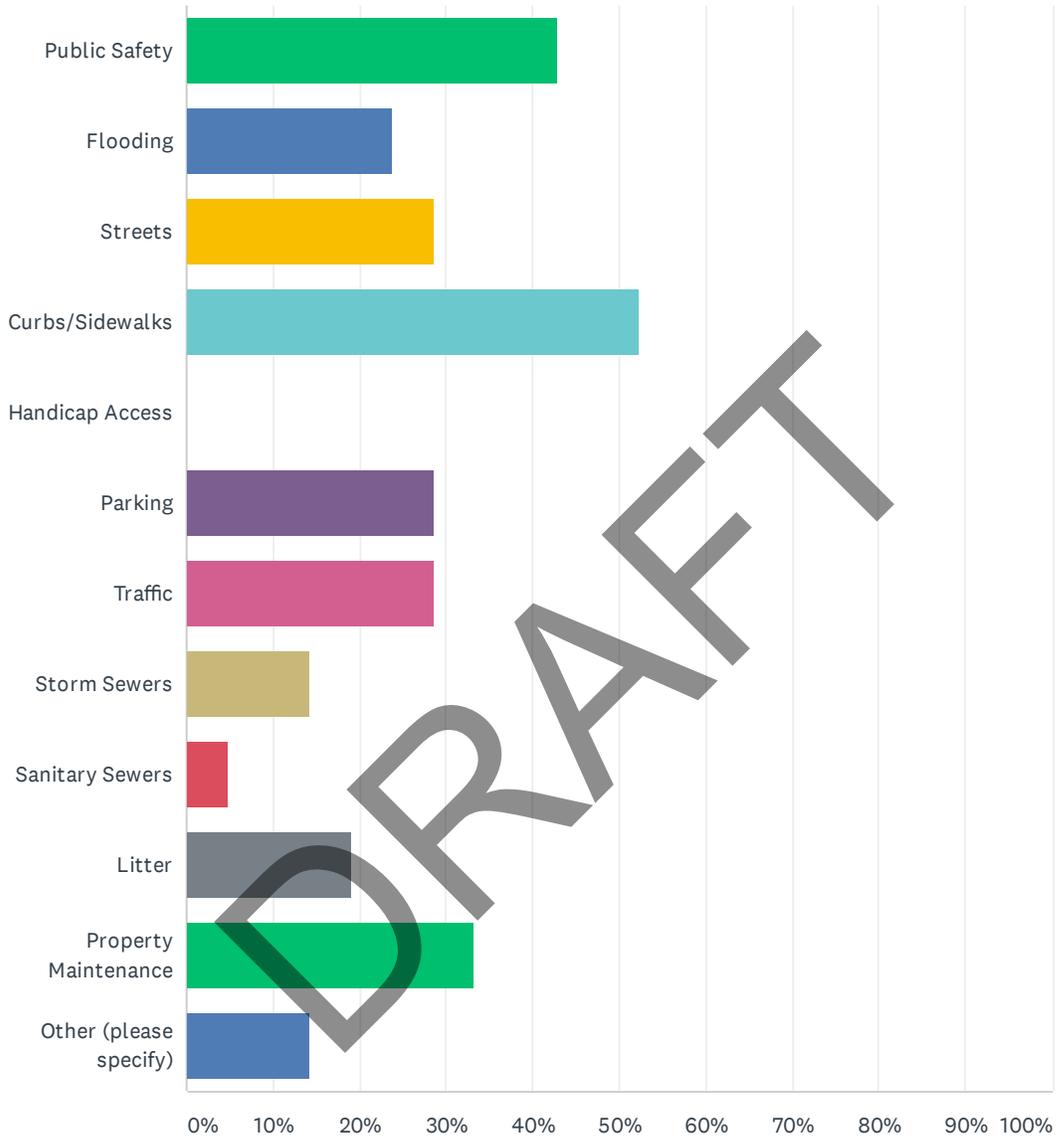
City of High Point, NC - Resident Survey

ANSWER CHOICES	RESPONSES	
Playground Equipment	45.45%	10
Benches & Picnic Tables	50.00%	11
Basketball Courts	18.18%	4
Tennis Courts	9.09%	2
Open Grass Fields	40.91%	9
Baseball Fields	4.55%	1
ADA Surfacing	9.09%	2
ADA Equipment	9.09%	2
Splash Pads	27.27%	6
Pools	18.18%	4
Walking/Biking Trails	63.64%	14
Ice Skating	13.64%	3
Skate Parks	18.18%	4
Other (please specify)	18.18%	4
Total Respondents: 22		

DRAFT

Q3 Are there any problems in your neighborhood with the following? (Choose all that apply):

Answered: 21 Skipped: 7



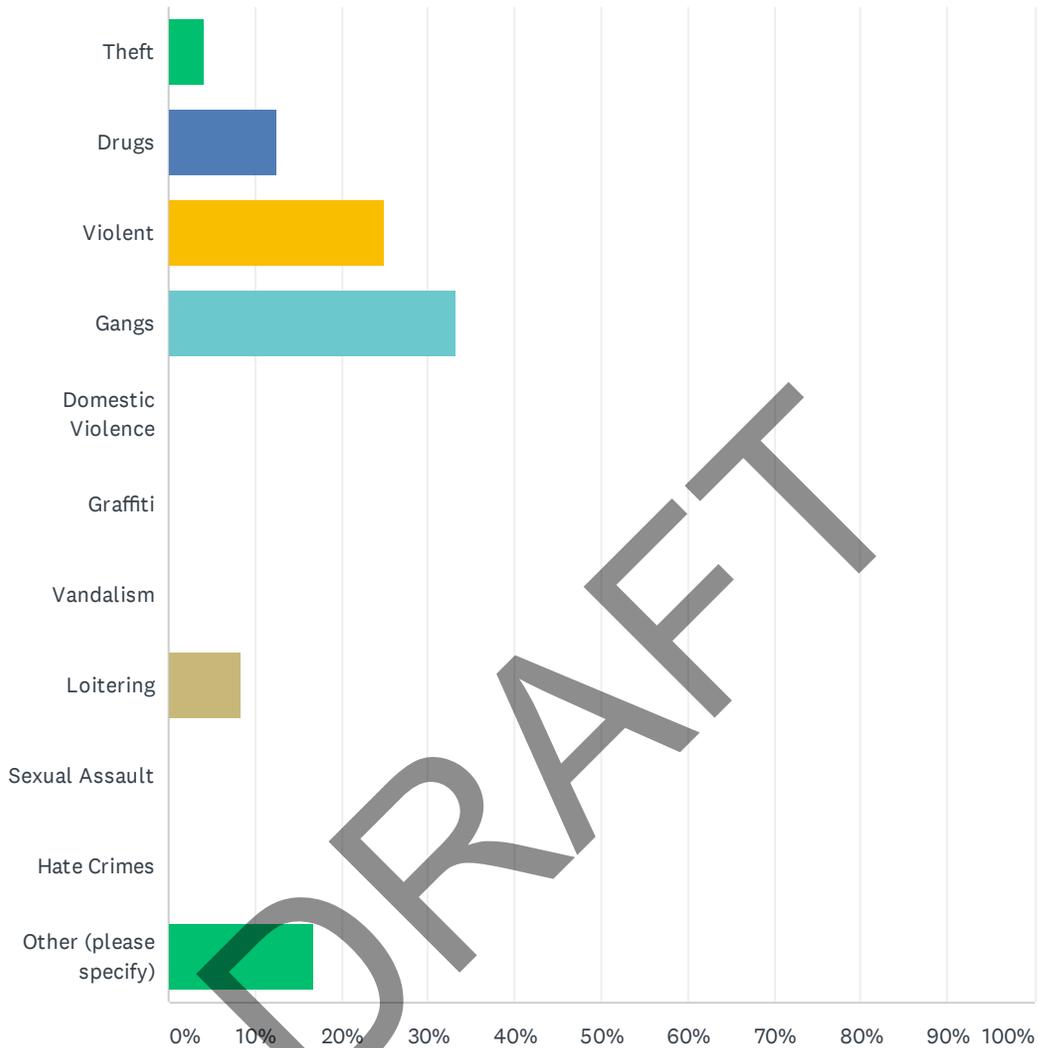
City of High Point, NC - Resident Survey

ANSWER CHOICES	RESPONSES	
Public Safety	42.86%	9
Flooding	23.81%	5
Streets	28.57%	6
Curbs/Sidewalks	52.38%	11
Handicap Access	0.00%	0
Parking	28.57%	6
Traffic	28.57%	6
Storm Sewers	14.29%	3
Sanitary Sewers	4.76%	1
Litter	19.05%	4
Property Maintenance	33.33%	7
Other (please specify)	14.29%	3
Total Respondents: 21		

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Q4 Identify any crime issues within the City of High Point.

Answered: 24 Skipped: 4



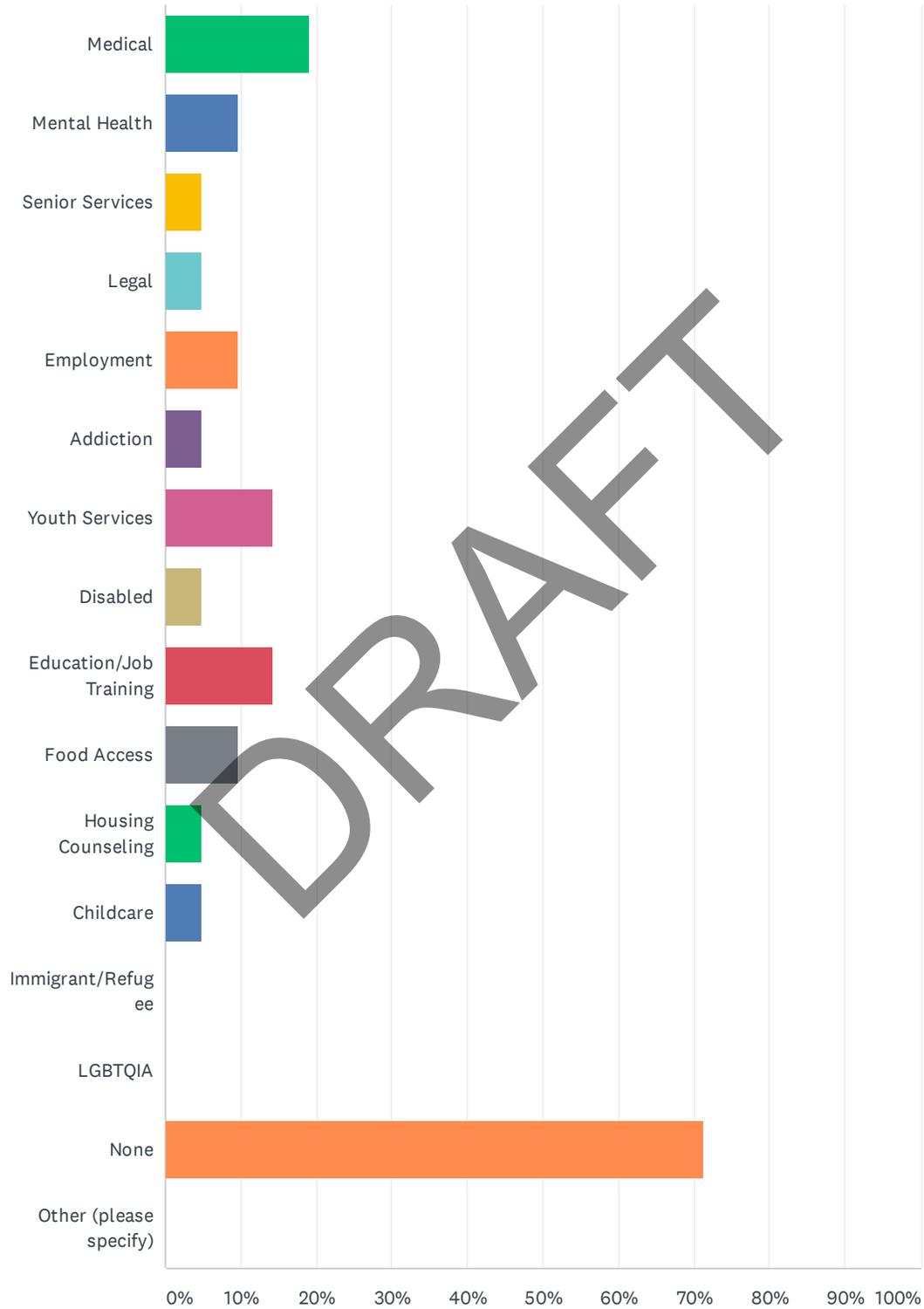
City of High Point, NC - Resident Survey

ANSWER CHOICES	RESPONSES	
Theft	4.17%	1
Drugs	12.50%	3
Violent	25.00%	6
Gangs	33.33%	8
Domestic Violence	0.00%	0
Graffiti	0.00%	0
Vandalism	0.00%	0
Loitering	8.33%	2
Sexual Assault	0.00%	0
Hate Crimes	0.00%	0
Other (please specify)	16.67%	4
TOTAL		24

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Q5 Do you use any of the social service programs available in the City? (Choose all that apply):

Answered: 21 Skipped: 7



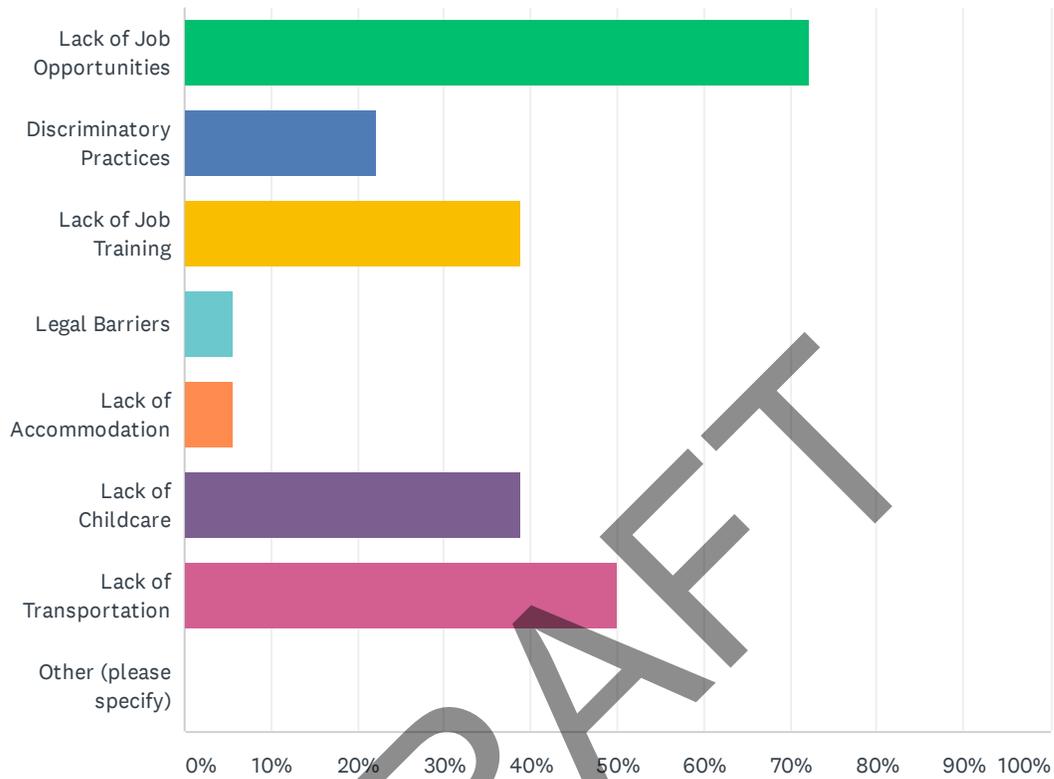
City of High Point, NC - Resident Survey

ANSWER CHOICES	RESPONSES	
Medical	19.05%	4
Mental Health	9.52%	2
Senior Services	4.76%	1
Legal	4.76%	1
Employment	9.52%	2
Addiction	4.76%	1
Youth Services	14.29%	3
Disabled	4.76%	1
Education/Job Training	14.29%	3
Food Access	9.52%	2
Housing Counseling	4.76%	1
Childcare	4.76%	1
Immigrant/Refugee	0.00%	0
LGBTQIA	0.00%	0
None	71.43%	15
Other (please specify)	0.00%	0
Total Respondents: 21		

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Q6 Identify any employment issues in the City of High Point? (Choose all that apply)

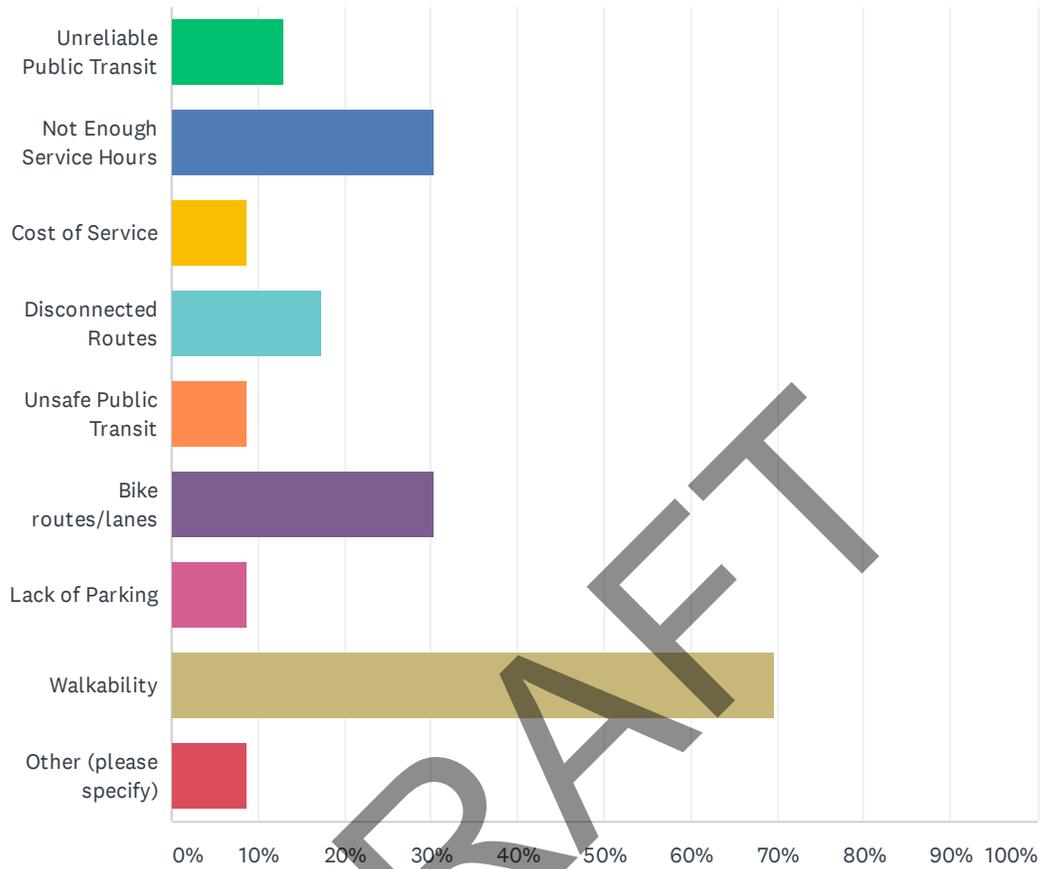
Answered: 18 Skipped: 10



ANSWER CHOICES	RESPONSES
Lack of Job Opportunities	72.22% 13
Discriminatory Practices	22.22% 4
Lack of Job Training	38.89% 7
Legal Barriers	5.56% 1
Lack of Accommodation	5.56% 1
Lack of Childcare	38.89% 7
Lack of Transportation	50.00% 9
Other (please specify)	0.00% 0
Total Respondents: 18	

Q7 Identify any transportation issues in the City of High Point.

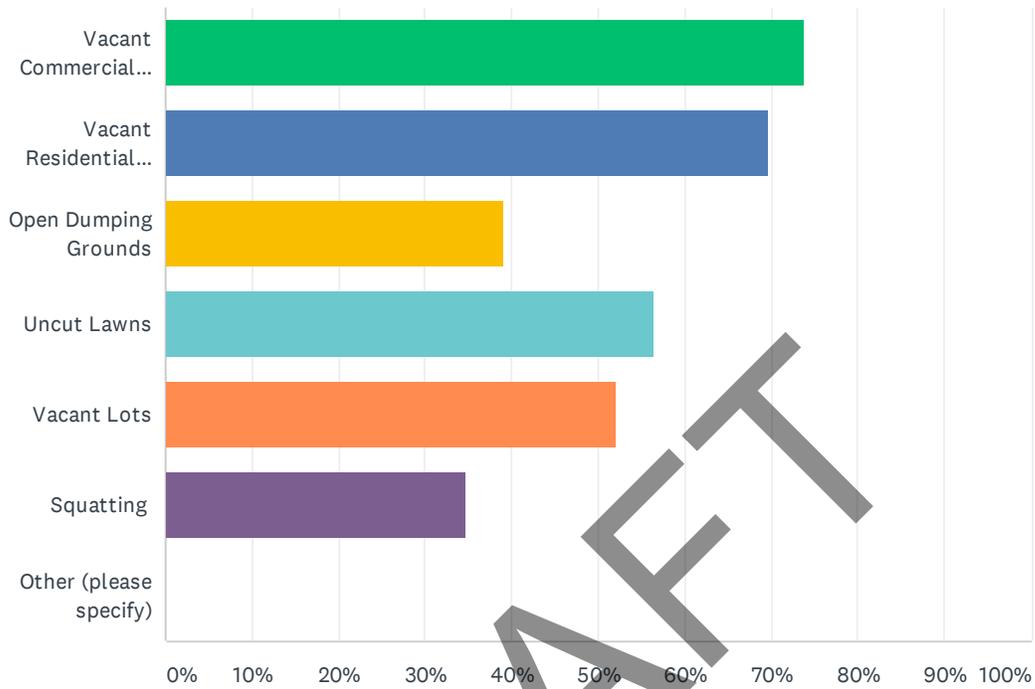
Answered: 23 Skipped: 5



ANSWER CHOICES	RESPONSES
Unreliable Public Transit	13.04% 3
Not Enough Service Hours	30.43% 7
Cost of Service	8.70% 2
Disconnected Routes	17.39% 4
Unsafe Public Transit	8.70% 2
Bike routes/lanes	30.43% 7
Lack of Parking	8.70% 2
Walkability	69.57% 16
Other (please specify)	8.70% 2
Total Respondents: 23	

Q8 Are there any blight (clearance/demolitions) issues in the City? (Choose all that apply):

Answered: 23 Skipped: 5



ANSWER CHOICES	RESPONSES	
Vacant Commercial Structures	73.91%	17
Vacant Residential Structures	69.57%	16
Open Dumping Grounds	39.13%	9
Uncut Lawns	56.52%	13
Vacant Lots	52.17%	12
Squatting	34.78%	8
Other (please specify)	0.00%	0
Total Respondents: 23		

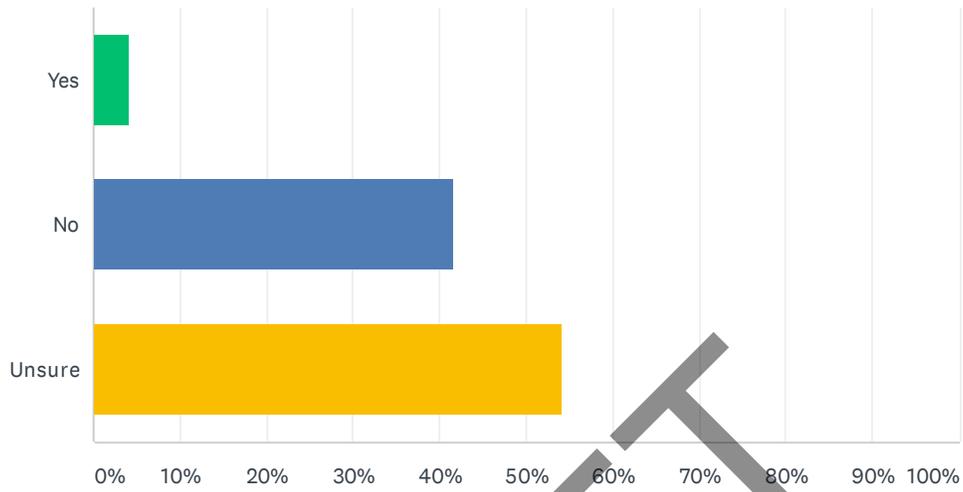
Q9 Are there any programs or services that are missing or under-funded in the city? Please list:

Answered: 4 Skipped: 24

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Q10 In your opinion, are residents of the City of High Point aware of how to report fair housing violations or concerns?

Answered: 24 Skipped: 4

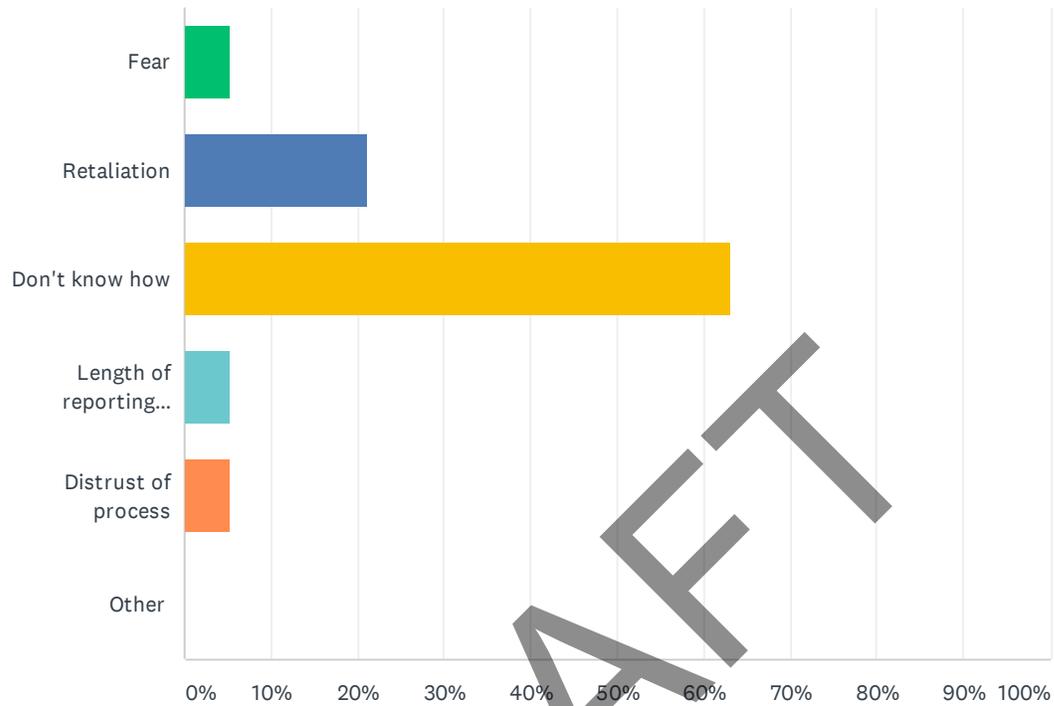


ANSWER CHOICES	RESPONSES	
Yes	4.17%	1
No	41.67%	10
Unsure	54.17%	13
Total Respondents: 24		

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Q11 What do you think are the primary reasons why fair housing complaints are not reported?

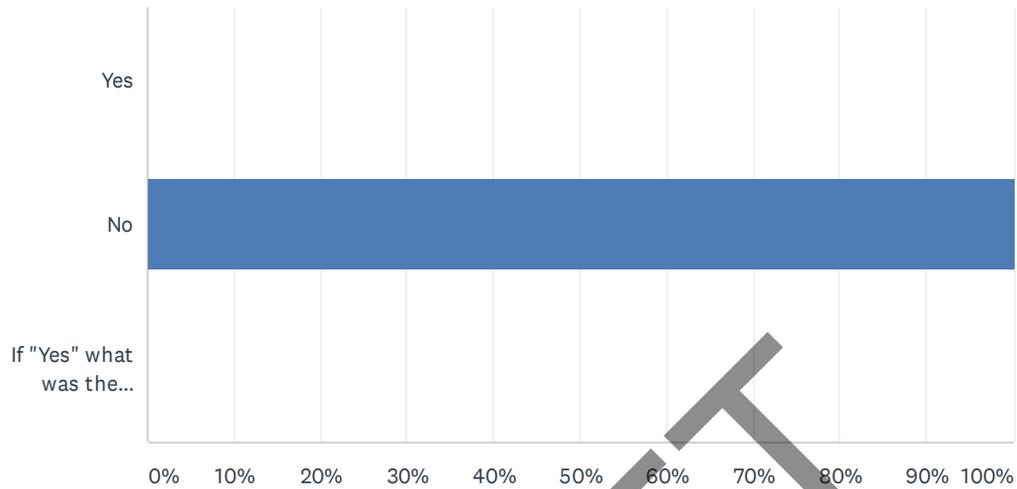
Answered: 19 Skipped: 9



ANSWER CHOICES	RESPONSES	
Fear	5.26%	1
Retaliation	21.05%	4
Don't know how	63.16%	12
Length of reporting process	5.26%	1
Distrust of process	5.26%	1
Other	0.00%	0
TOTAL		19

Q12 If you are a renter, has your landlord refused to make a reasonable accommodation for a disability?

Answered: 6 Skipped: 22

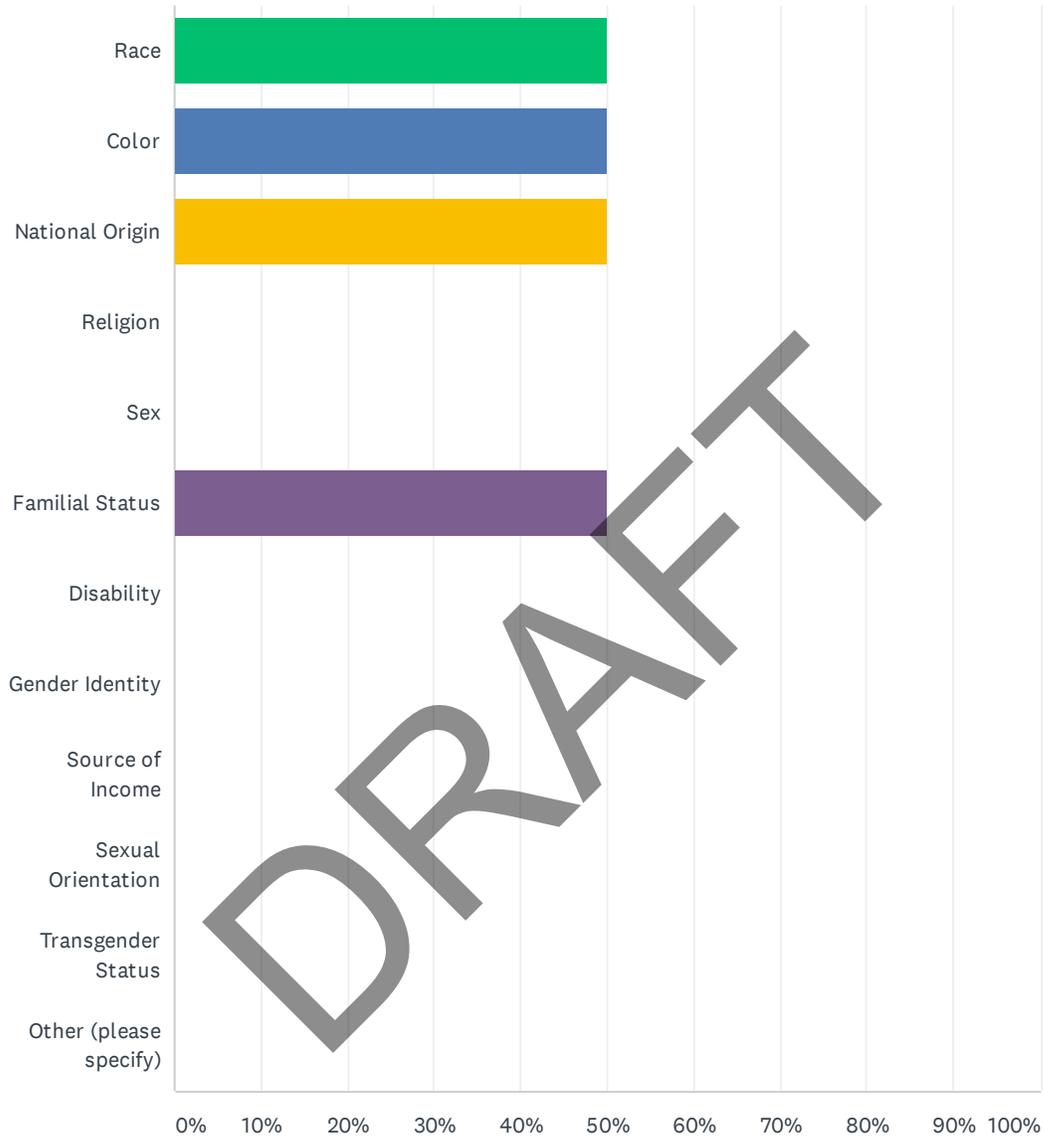


ANSWER CHOICES	RESPONSES	
Yes	0.00%	0
No	100.00%	6
If "Yes" what was the request?	0.00%	0
TOTAL		6

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Q13 Have you faced housing discrimination based on any of these characteristics? (Check all that apply):

Answered: 2 Skipped: 26



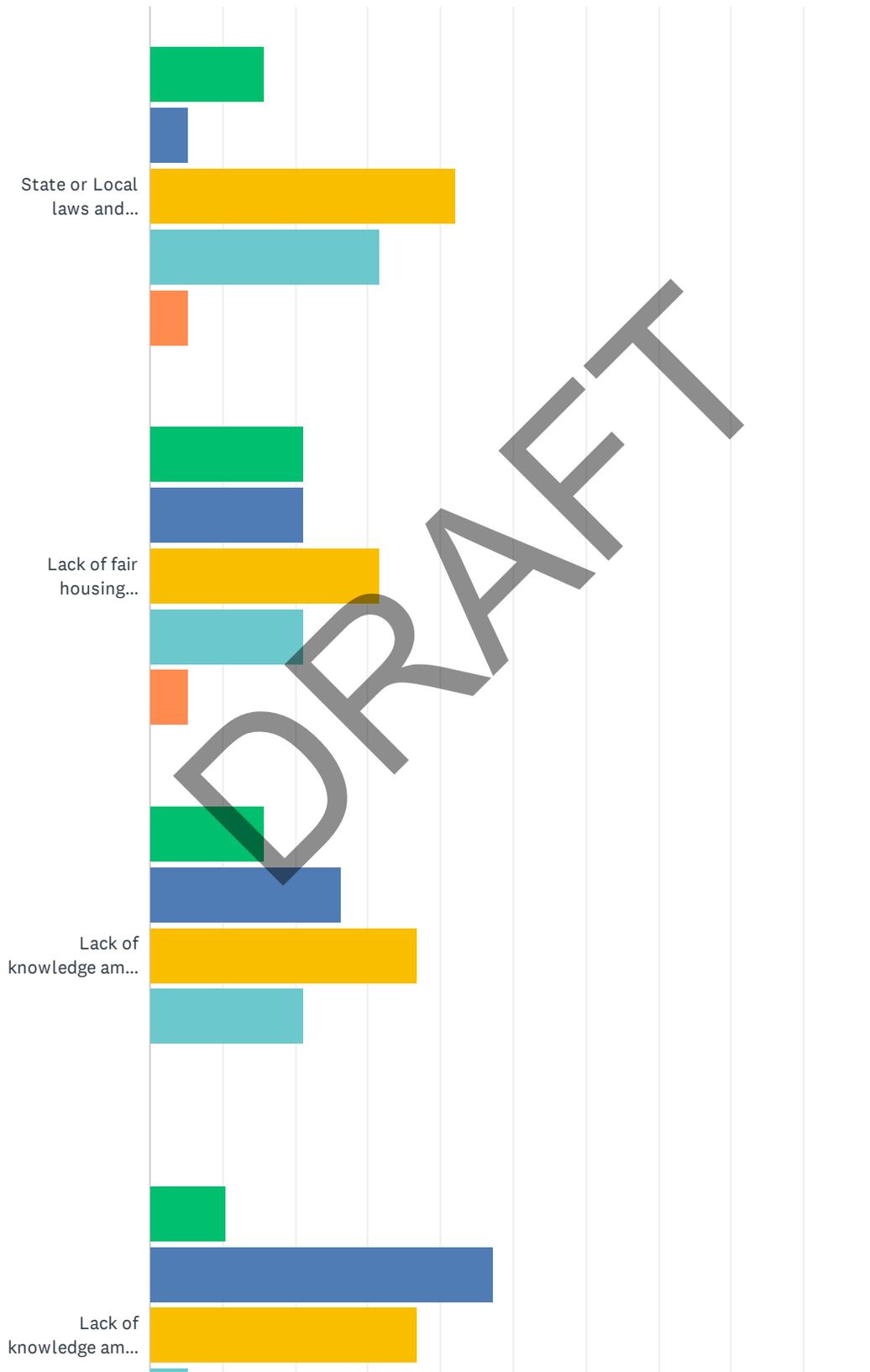
City of High Point, NC - Resident Survey

ANSWER CHOICES	RESPONSES	
Race	50.00%	1
Color	50.00%	1
National Origin	50.00%	1
Religion	0.00%	0
Sex	0.00%	0
Familial Status	50.00%	1
Disability	0.00%	0
Gender Identity	0.00%	0
Source of Income	0.00%	0
Sexual Orientation	0.00%	0
Transgender Status	0.00%	0
Other (please specify)	0.00%	0
Total Respondents: 2		

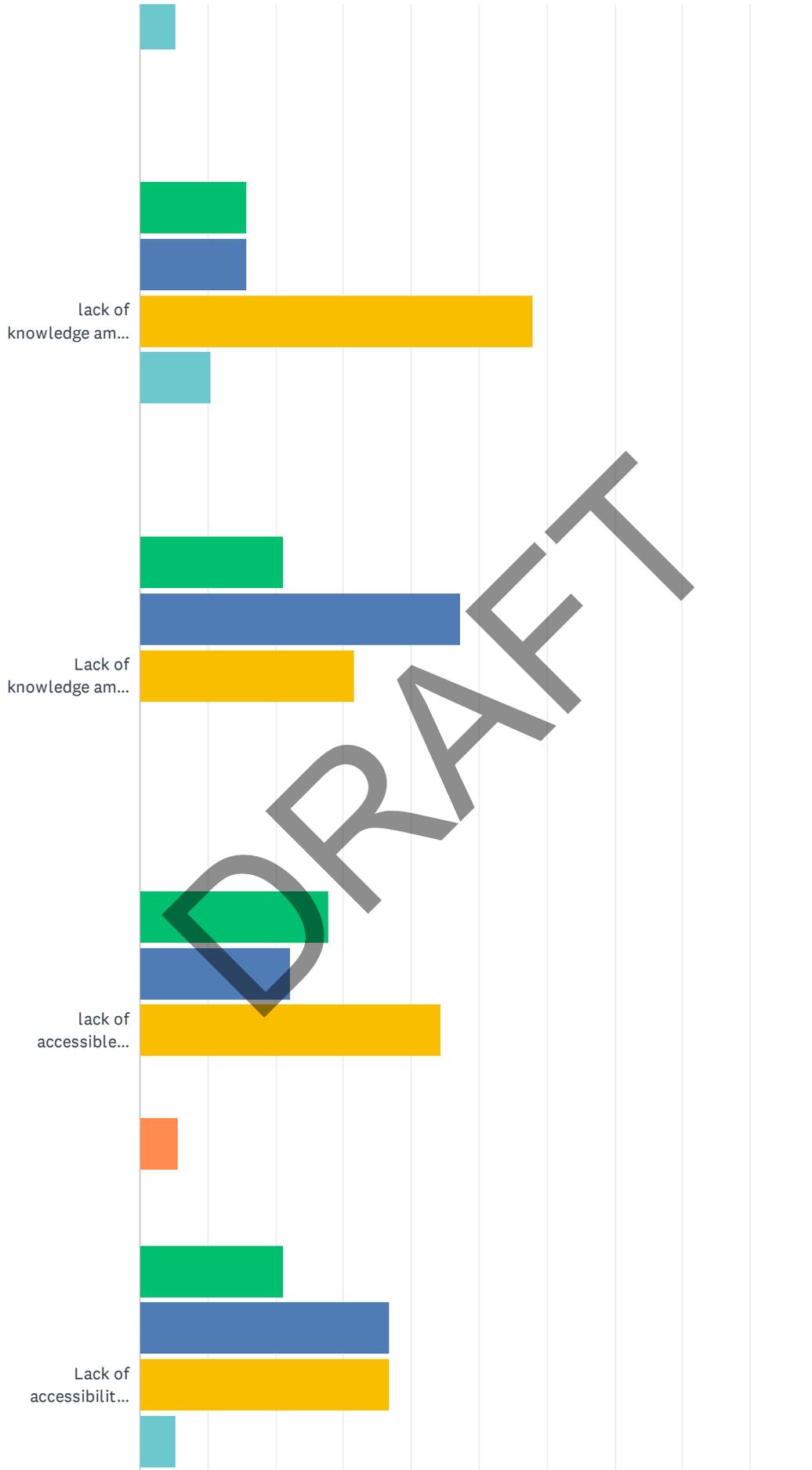
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Q14 Please evaluate whether the following situations result in further discrimination and/or barriers to fair housing in the City of High Point

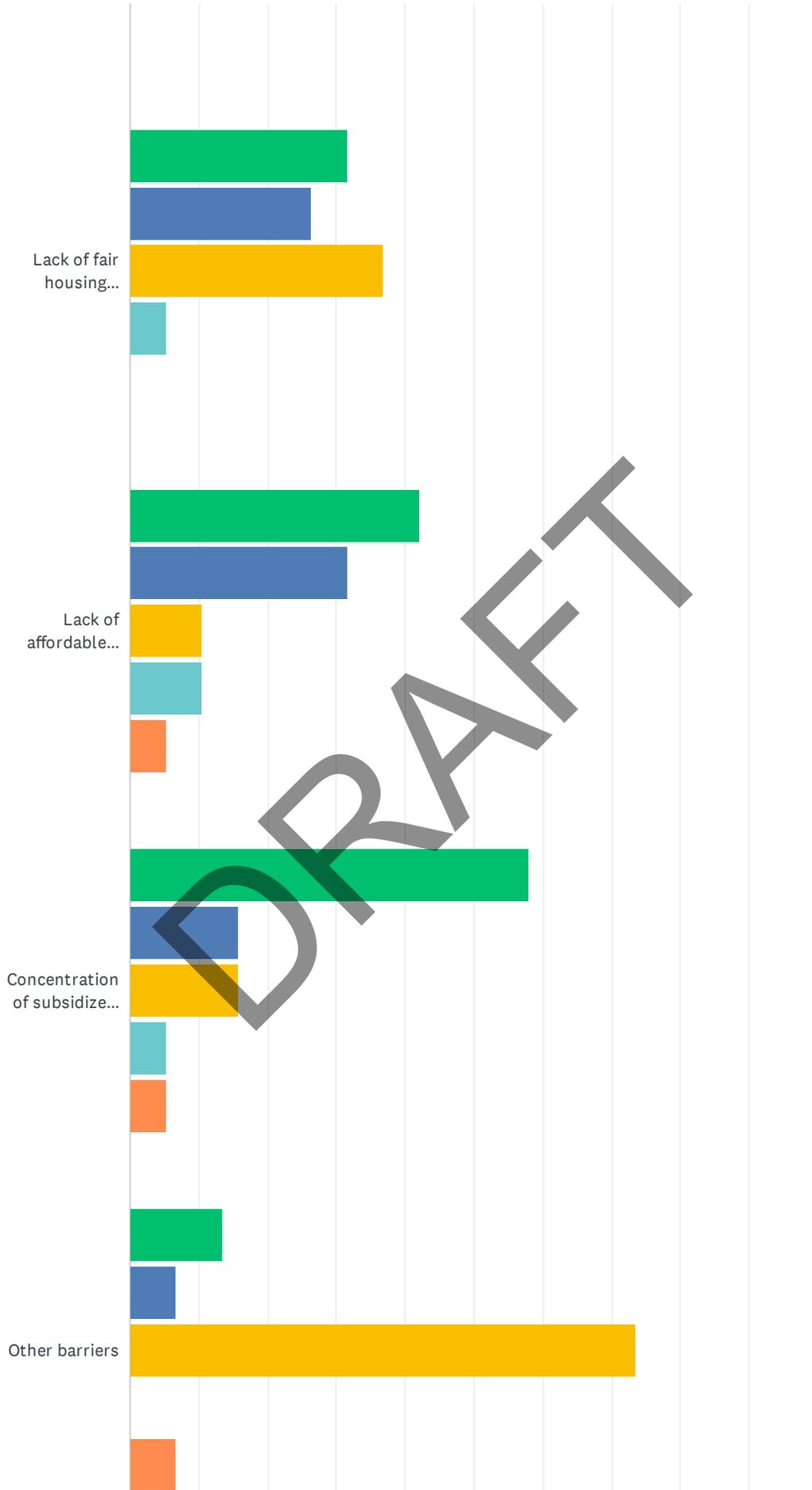
Answered: 19 Skipped: 9



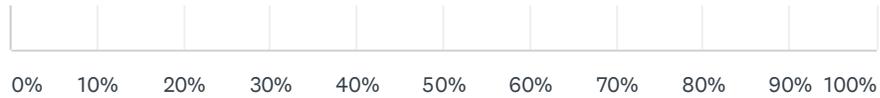
City of High Point, NC - Resident Survey



City of High Point, NC - Resident Survey



City of High Point, NC - Resident Survey



■ Strongly Agree
 ■ Agree
 ■ Neutral/Unsure
 ■ Disagree
■ Strongly Disagree

	STRONGLY AGREE	AGREE	NEUTRAL/UNSURE	DISAGREE	STRONGLY DISAGREE	TOTAL
State or Local laws and policies that limit housing choice	15.79% 3	5.26% 1	42.11% 8	31.58% 6	5.26% 1	19
Lack of fair housing organizations in the city	21.05% 4	21.05% 4	31.58% 6	21.05% 4	5.26% 1	19
Lack of knowledge among bankers/lenders regarding fair housing	15.79% 3	26.32% 5	36.84% 7	21.05% 4	0.00% 0	19
Lack of knowledge among landlords and property managers regarding fair housing	10.53% 2	47.37% 9	36.84% 7	5.26% 1	0.00% 0	19
lack of knowledge among real estate agents regarding fair housing	15.79% 3	15.79% 3	57.89% 11	10.53% 2	0.00% 0	19
Lack of knowledge among residents regarding fair housing	21.05% 4	47.37% 9	31.58% 6	0.00% 0	0.00% 0	19
lack of accessible housing for persons with disabilities	27.78% 5	22.22% 4	44.44% 8	0.00% 0	5.56% 1	18
Lack of accessibility in neighborhoods (i.e. curb cuts)	21.05% 4	36.84% 7	36.84% 7	5.26% 1	0.00% 0	19
Lack of fair housing education	31.58% 6	26.32% 5	36.84% 7	5.26% 1	0.00% 0	19
Lack of affordable housing in certain areas	42.11% 8	31.58% 6	10.53% 2	10.53% 2	5.26% 1	19
Concentration of subsidized housing in certain neighborhoods	57.89% 11	15.79% 3	15.79% 3	5.26% 1	5.26% 1	19
Other barriers	13.33% 2	6.67% 1	73.33% 11	0.00% 0	6.67% 1	15

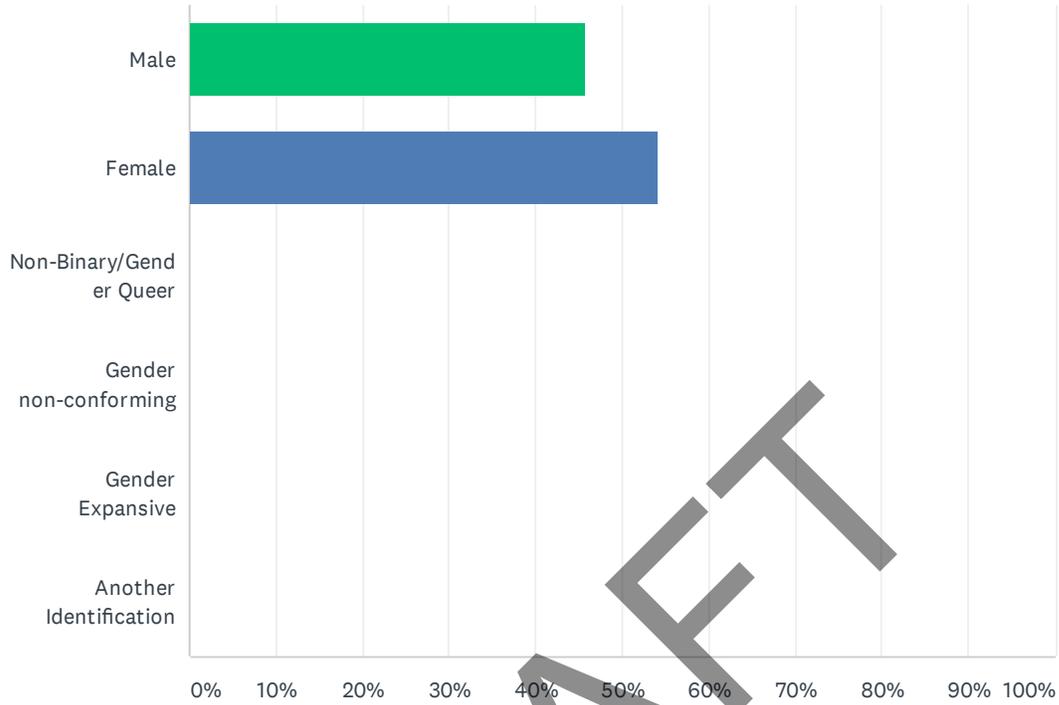
Q15 Are there any additional comments or concerns that you wish to share?

Answered: 1 Skipped: 27

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Q16 Gender

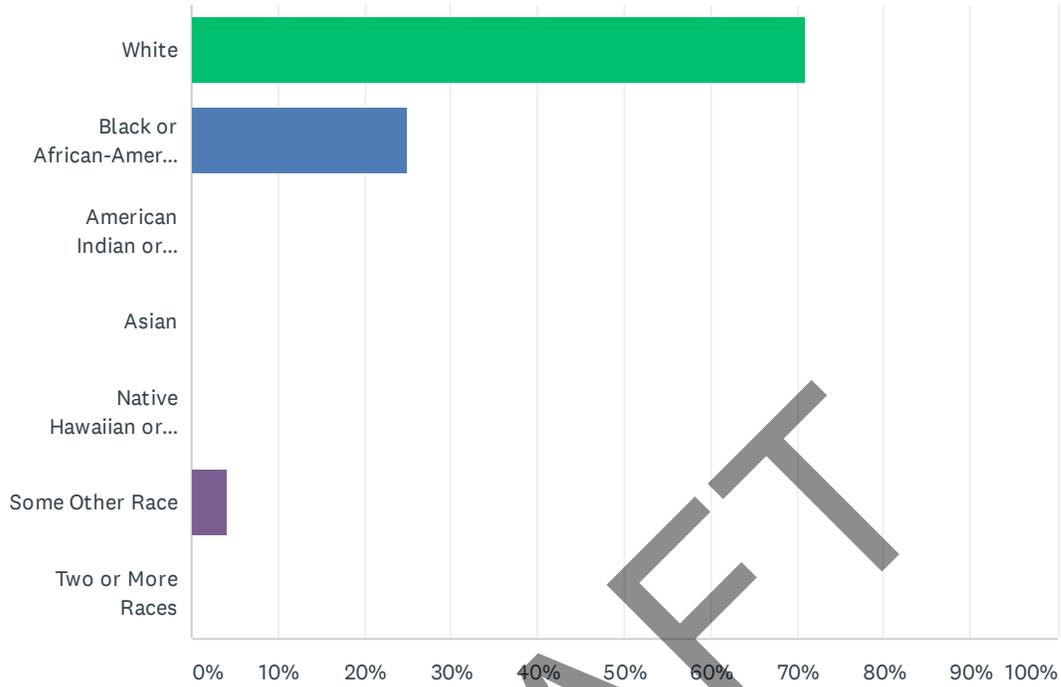
Answered: 24 Skipped: 4



ANSWER CHOICES	RESPONSES	
Male	45.83%	11
Female	54.17%	13
Non-Binary/Gender Queer	0.00%	0
Gender non-conforming	0.00%	0
Gender Expansive	0.00%	0
Another Identification	0.00%	0
TOTAL		24

Q17 Race

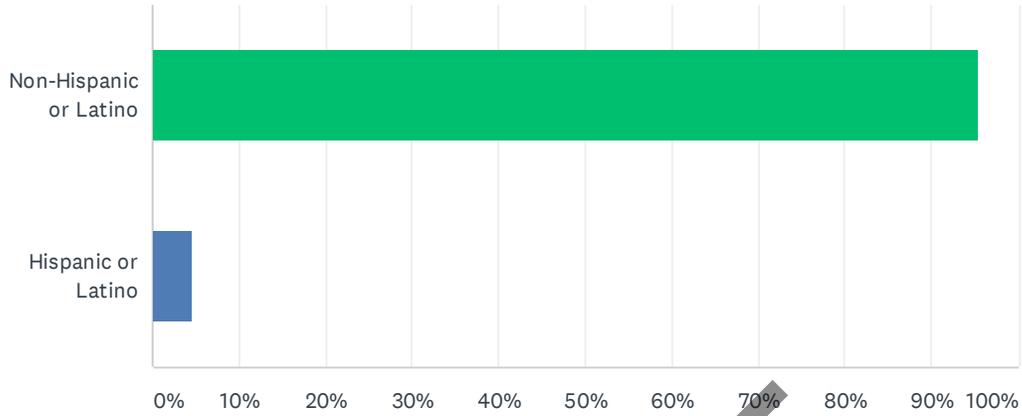
Answered: 24 Skipped: 4



ANSWER CHOICES	RESPONSES	
White	70.83%	17
Black or African-American	25.00%	6
American Indian or Alaskan Native	0.00%	0
Asian	0.00%	0
Native Hawaiian or other Pacific Islander	0.00%	0
Some Other Race	4.17%	1
Two or More Races	0.00%	0
Total Respondents: 24		

Q18 Ethnicity:

Answered: 22 Skipped: 6

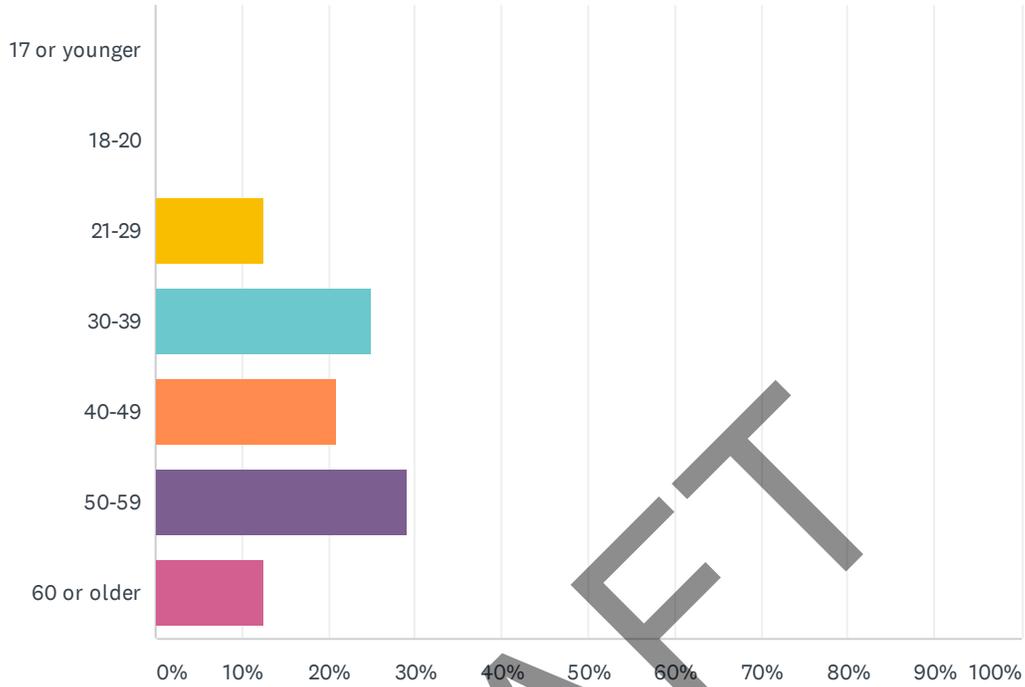


ANSWER CHOICES	RESPONSES	
Non-Hispanic or Latino	95.45%	21
Hispanic or Latino	4.55%	1
Total Respondents: 22		

DRAFT

Q19 Age

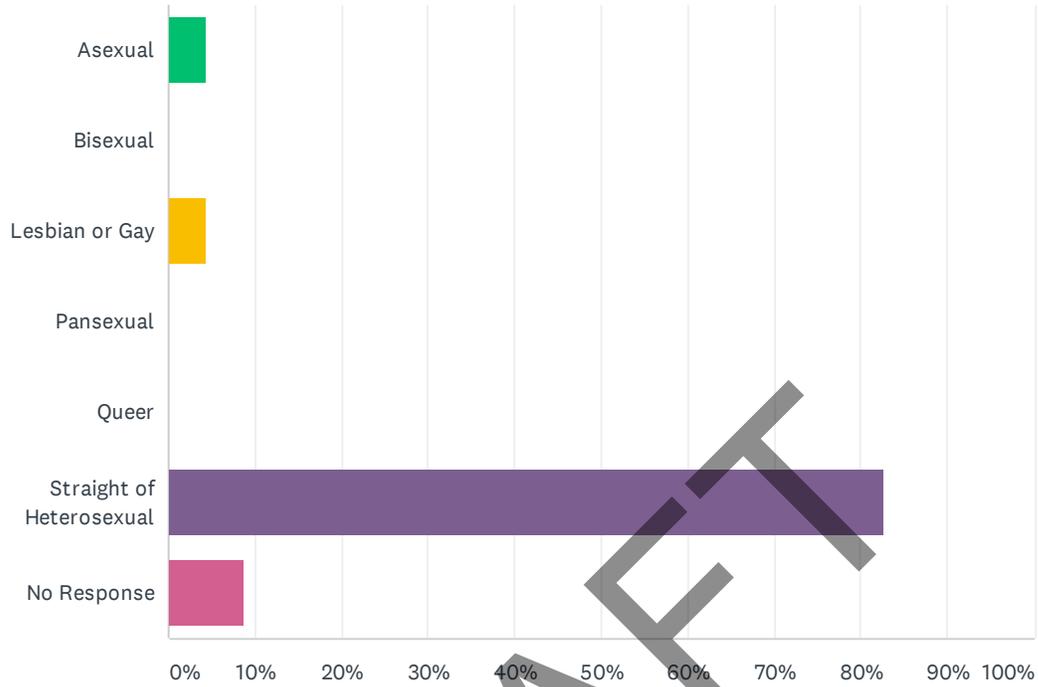
Answered: 24 Skipped: 4



ANSWER CHOICES	RESPONSES
17 or younger	0.00% 0
18-20	0.00% 0
21-29	12.50% 3
30-39	25.00% 6
40-49	20.83% 5
50-59	29.17% 7
60 or older	12.50% 3
TOTAL	24

Q20 What is your sexual orientation?

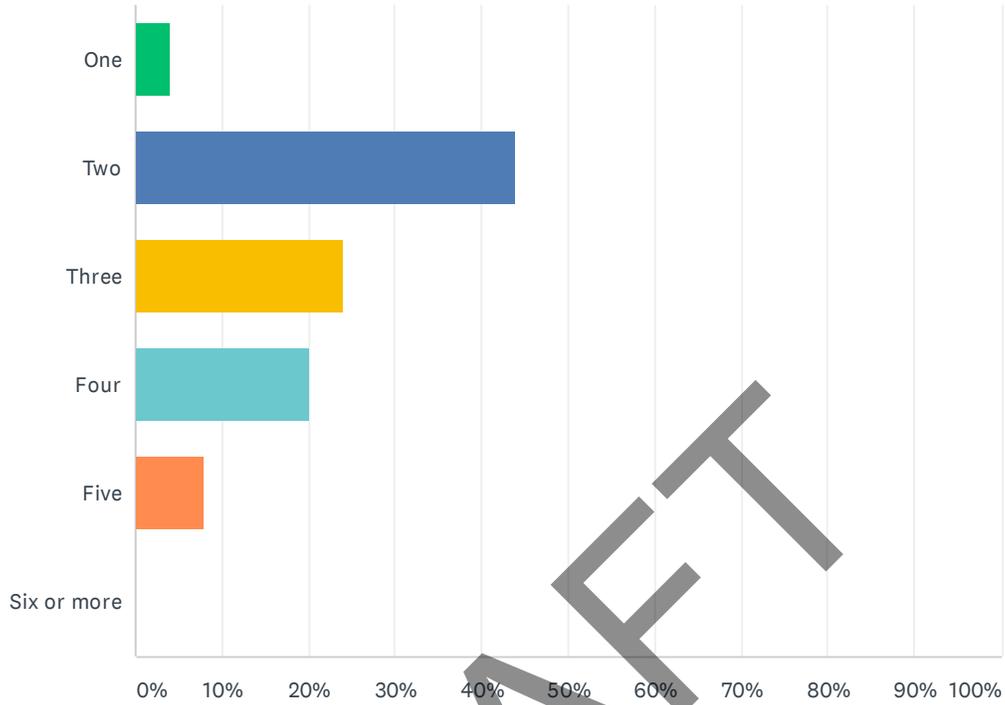
Answered: 23 Skipped: 5



ANSWER CHOICES	RESPONSES	
Asexual	4.35%	1
Bisexual	0.00%	0
Lesbian or Gay	4.35%	1
Pansexual	0.00%	0
Queer	0.00%	0
Straight of Heterosexual	82.61%	19
No Response	8.70%	2
TOTAL		23

Q21 Number of persons living in your household?

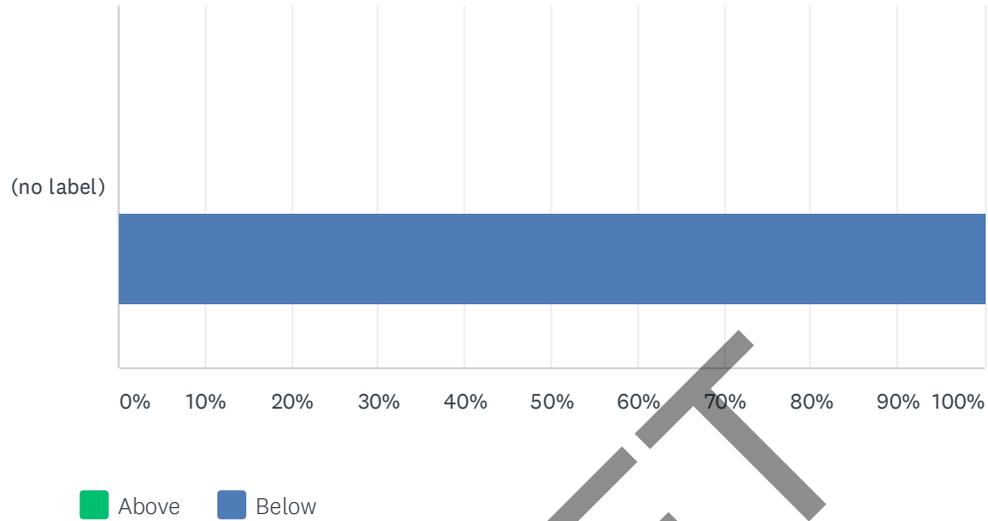
Answered: 25 Skipped: 3



ANSWER CHOICES	RESPONSES
One	4.00% 1
Two	44.00% 11
Three	24.00% 6
Four	20.00% 5
Five	8.00% 2
Six or more	0.00% 0
TOTAL	25

Q22 If you are a one (1) person household, is your total household income above or below \$33,900 per year?

Answered: 1 Skipped: 27

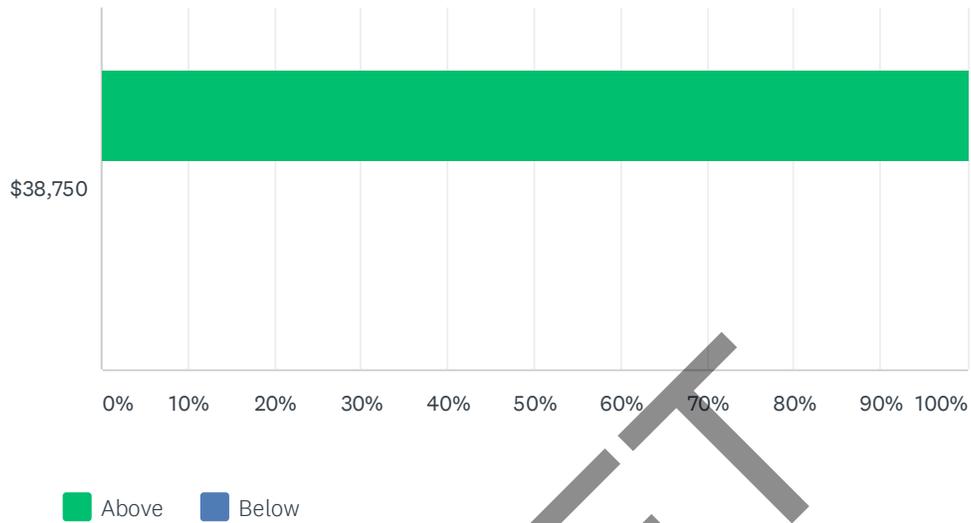


	ABOVE	BELOW	TOTAL	WEIGHTED AVERAGE
(no label)	0.00% 0	100.00% 1	1	2.00

DRAFT

Q23 If you are a two (2) person household, is your total household income above or below \$38,750 per year?

Answered: 11 Skipped: 17

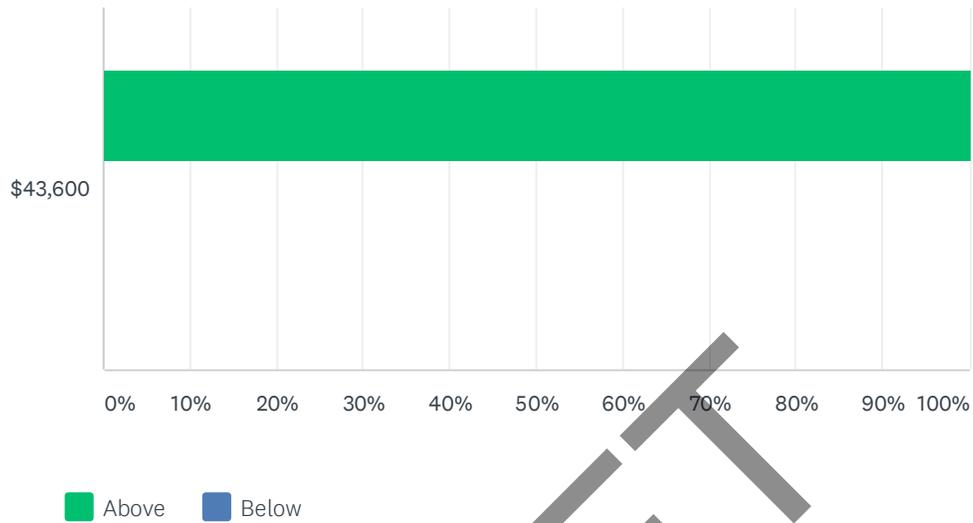


	ABOVE	BELOW	TOTAL
\$38,750	100.00%	0.00%	
	11	0	11

DRAFT

Q24 If you are a three (3) person household, is your total household income above or below \$43,600 per year?

Answered: 6 Skipped: 22

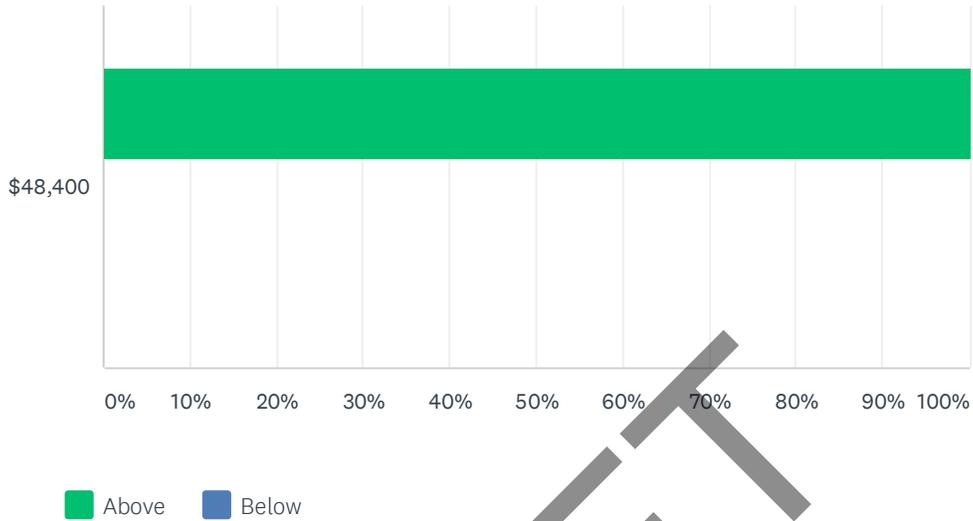


	ABOVE	BELOW	TOTAL
\$43,600	100.00% 6	0.00% 0	6

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Q25 If you are a four (4) person household, is your total household income above or below \$48,400 per year?

Answered: 5 Skipped: 23

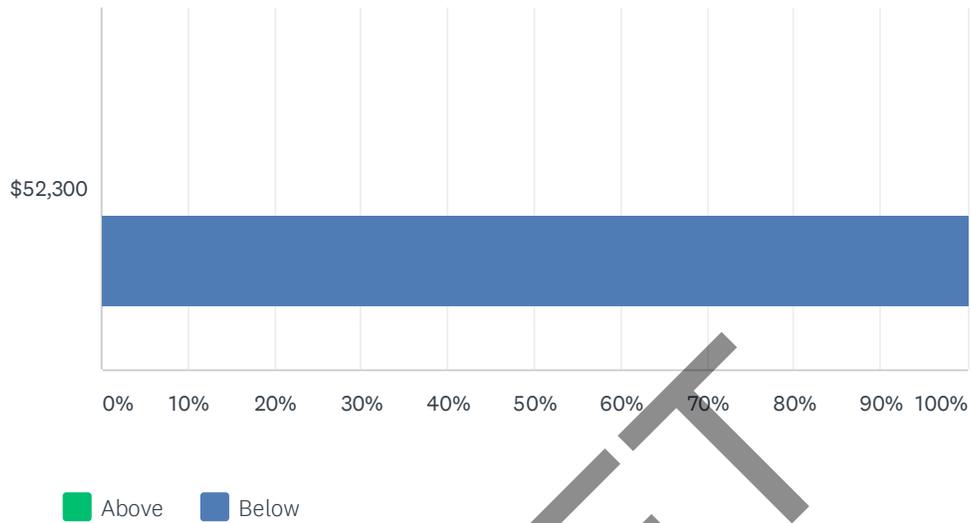


	ABOVE	BELOW	TOTAL
\$48,400	100.00% 5	0.00% 0	5

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Q26 If you are a five (5) person household, is your total household income above or below \$52,300 per year?

Answered: 2 Skipped: 26



	ABOVE	BELOW	TOTAL
\$52,300	0.00%	100.00%	
	0	2	2

DRAFT

Q27 If you are a six (6) person household, is your total household income above or below \$56,150 per year?

Answered: 0 Skipped: 28

 No matching responses.

	ABOVE	BELOW	TOTAL
\$56,150	0.00% 0	0.00% 0	0

DRAFT

Q28 Choose your housing status:

Answered: 0 Skipped: 28

 No matching responses.

ANSWER CHOICES	RESPONSES
Homeowner	0.00% 0
Renter	0.00% 0
Homeless	0.00% 0
Living with friends/relatives	0.00% 0
Temporary Shelter	0.00% 0
Hotel/Motel	0.00% 0
Mobile Home	0.00% 0
Vehicle	0.00% 0
Other (please specify)	0.00% 0
Total Respondents: 0	

DRAFT

C. Appendix C – Public Comments

Attached are summaries of the following meetings:

- Monday, December 9, 2019 Public Hearing
- Tuesday, December 10, 2019 Public Hearing

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PUBLIC MEETING NOTICE
CITY OF HIGH POINT, NORTH CAROLINA FY 2020
COMMUNITY DEVELOPMENT BLOCK GRANT & HOME INVESTMENT
PARTNERSHIP PROGRAMS

Notice is hereby given that the City of High Point, North Carolina will hold public meetings on **December 9, 2019, 6:00 p.m.** at Nathanael S. Morehead Recreation Center (101 Price St., High Point, NC 27260); and on **December 10, 2019, 6:00 p.m.** at the High Point Public Library, Morgan Room (901 N. Main St., High Point, NC 27262). Both locations are accessible to persons with disabilities. Persons with disabilities or who otherwise need assistance should contact Thanena Wilson at (336) 883-3351 or 336-883-8517 (TDD) in advance of the public meetings.

The purpose of the public meetings is to gather information for the City's Five-Year Consolidated Plan for FY 2020-2024, the Annual Action Plan for FY 2020, and the City's Analysis of Impediments to Fair Housing Choice (A.I.), which the City must prepare and submit to the U.S. Department of Housing and Urban Development (HUD) for the Community Development Block Grant (CDBG) Program. Additionally, the meetings will be used to solicit the views and comments of individuals and organizations concerning any impediments to fair housing choice in the City and what steps should be undertaken to affirmatively further fair housing.

The City of High Point anticipates, based on last fiscal year's allocation, that it may receive an estimated CDBG entitlement grant in the amount of \$948,000 and an estimated HOME entitlement grant in the amount of \$505,000 for FY 2020. In preparing its CDBG application the City intends to afford citizens, local agencies, and interested parties the opportunity to become involved in the planning process.

All interested citizens are encouraged to attend these public meetings and they will be given the opportunity to present oral or written comments concerning the needs of the City of High Point and the use of CDBG and HOME funds to address those needs over the next five (5) years. Written comments may be addressed to Ms. Thanena Wilson, Assistant Director, Community Development and Housing Department, City of High Point, 211 S. Hamilton Street, Room 312, High Point, NC 27260, fax at 336-883-3355, or via email at cdadmin@highpointnc.gov.

Si necesita esta información en español, por favor póngase en contacto con Arisbett Adame Smith (336) 883-3349.

Thanena Wilson, Assistant Director
Community Development and Housing Department
City of High Point, NC



City of High Point, North Carolina –
FY 2020-2024 Five Year Consolidated Plan, FY 2020 Annual Action Plan, and
FY 2020 Analysis of Impediments to Fair Housing Choice
Public Meeting – Morehead Recreation Center
Monday, December 9, 2019 - 6:00 PM

Name	Organization	Phone Number	Email Address
JERRY MINGO	BURNS HILL NEIGHBORHOOD ASSOCIATION	336 789-0308	JERRY47H15@YAHOO.COM
Bernita Sims	WRAP, Inc. CHA - OIC	336-691-5780	berntas@wrp.net
Nena Wilson	City of High Point	336-883-3357	Nena.Wilson@highpointnc.gov
Michelle McNeil	CHP	336/883-3685	Michelle.McNeil@highpointnc.gov
Meredith Green	CHP	336 883-3689	Meredith.Green@highpointnc.gov

City of High Point, NC

2020-2024 Five Year Consolidated Plan & Analysis of Impediments

Public Hearing – Morehead Recreation Center

Monday, December 9, 2019 at 6:00pm

The following was discussed at the meeting:

- The public meeting started at 6:05pm.
- The citizen had a neighbor that participated in a rehab loan program and was satisfied.
- The citizen lives in Burns Hill which is in the East Central part of the City.
- One of the biggest concerns in the neighborhood is the number of boarded up abandoned houses.
- The general appearance of neighborhoods is not good. People do not maintain their sidewalks.
- Kids will walk in the street to get to the school bus because of the low quality of sidewalks.
- Some houses are not in good enough condition to be torn down.
- The City has a land bank for tax foreclosures.
- The City does not have a good record of vacant properties.
- There was a request to send a list of vacant properties to the City's Community Development Department.
- The City may demolish 45-50 units per year.
- Economic development can be a part of the CDBG program for areas without businesses.
- The Burns Hill Neighborhood has a reputation for high crime, but most of this crime is committed by people coming in to the neighborhood.
- There is some interest in police substations.
- There is a need for police to get out of their cars and introduce themselves. There is a need for the police to engage more with members of the community.
- There are magnet schools in the City that mirror private schools.
- There are big problems with public transit. Most of the jobs are located on the I-68 Corridor and buses do not run late enough to these far-out areas. There is a need for more service hours instead of 6am to 6pm as is the current case.
- The Community College is working to start a CDL program to help recruit bus drivers.
- Bus drivers require 2 years of experience in addition to the CDL which makes it hard to recruit bus drivers.
- The second community member works for a CAC that works with people at 125% over the poverty level and helps people with employment, housing, wraparound services, etc. This organization also works with homeless individuals.
- The biggest need is housing that people can afford.
- The local housing stock that is affordable is low quality.
- In pockets of poverty, the population is mostly black or African American.
- There are food deserts in the City. All of the grocery stores are concentrated in the same parts of the community and not in the impoverished areas. Hunger is a big issue.
- Youth hunger is a major need. There are many backpack programs in the City.

- Medicine is largely unaffordable.
- Maintenance medication is expensive. Diabetes is common and people are unable to afford it.
- Medical care is unaffordable and people in poverty cannot access medical care.
- There is a need to integrate funding that comes to Community Services, Community Development, and funding from the County.
- There is a need to focus on changing communities holistically. This includes working on developing models similar to the Community Schools Model.
- It is often cheaper to keep a family housed than it is to build a new shelter, and this is a good leverage point for governments.
- Keeping people within their apartments is more effective than evicting people, and continuing to build shelters makes the intervention point the shelter and not meeting people where they are.
- Homeless people are being imported to the area.
- Income inequality is causing a massive increase in homelessness.

The meeting ended at 7:02pm.

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City of High Point, North Carolina –
FY 2020-2024 Five Year Consolidated Plan, FY 2020 Annual Action Plan, and
FY 2020 Analysis of Impediments to Fair Housing Choice
Public Meeting – High Point Library – Morgan Room
Tuesday, December 10, 2019 – 6:00 PM

Name	Organization	Phone Number	Email Address
Patricia Harner	Hyden Harner Family	336-501-2703	Patrickserv@ecol.com
Martha Wheeler	West End	267-481-4964 336	jesuslambtygudd@outlook.com
Don Becton	BHN/A	847-4921	debsr@northstate.net
Alisha Doulen	CHP	883-3042	alisha.doulen@highpointnc.gov
Therena Wilson	City of High Point	336-883-3357 (336)	therena.wilson@highpointnc.gov
Michelle McNew	CHP	883-3695 336	michelle.mcneairs@highpointnc.gov
Robert Sims	WRCP	908-7623	roberts@wrp.net
Emelyn Williams	London World Neighborhood Center	336-884-0566	ekwilliams1@trid,nc.gov



City of High Point, North Carolina –
 FY 2020-2024 Five Year Consolidated Plan, FY 2020 Annual Action Plan, and
 FY 2020 Analysis of Impediments to Fair Housing Choice
 Public Meeting – High Point Library – Morgan Room
 Tuesday, December 10, 2019 – 6:00 PM

Name	Organization	Phone Number	Email Address
Walt Hyland	Urban Design Ventures	(412) 461-6916	walth@urbdesignventures.com
Brandon Wilson	Urban Design Ventures	412-461-6916	brandon@urbdesignventures.com
Michael E. Nason	C10 + H	336-883-3676	michael.n@highpointnc.gov

City of High Point, NC

2020-2024 Five Year Consolidated Plan & Analysis of Impediments

Public Hearing – High Point Public Library

Tuesday December 10, 2019 at 6:00pm

The following was discussed at the meeting:

- The public meeting started at 6:09pm.
- There was a recent needs assessment completed by the Resilience Working Group.
- There was a recommendation to give people bus passes to increase ridership.
- There is a need for a day shelter in the City.
- There is a need for greater case management with Open Door Ministries.
- In the Northern part of the City, there was NIMBYism toward the affordable housing complexes.
- The developer withdrew this plan as a result of NIMBYism.
- There are likely the same problems here as there are in larger cities.
- A person who moved from a larger City was surprised to see the number of homeless people in such a small City.
- There was a ministry providing 5-10 tents to give people shelters and they were used in relatives' yards or in the woods.
- There are problems taking care of the elderly and disabled.
- A citizen told an anecdote about an elderly neighbor with a mentally challenged nephew. There is likely a need to assist a person like this.
- There is a need to further meet the needs of senior citizens in the area.
- One citizen echoed concerns about the homeless population and believed they should be a highly prioritized population.
- People without homes likely experience food insecurity as well.
- There is a question of what the City can do about the homeless population and how it can prioritize the homeless population.
- There were questions as to whether CDBG funding could be used for Rapid Rehousing and operations of a homeless day shelter.
- Traditionally, High Point has prioritized giving structures than of operations for services.
- The City uses its CDBG funds to leverage other funds and get Tax Credit projects.
- There have been improvements to bus stops in the area. There are major areas that still require better bus stops and shelters. Some bus stops are in ditches and in residents' yards.
- There is a lack of sidewalks in many neighborhoods.
- There is a tenant education program at UNC Greensboro. Steven Stills is in charge of this.
- There is a problem with speeding in the London Woods neighborhood. They hope to work on some speed bumps if necessary.
- London Woods also has littering problems.
- In London Woods, the problem is a repo and tow truck business with cars all over people's yards. The current zoning ordinance does not allow the City to take the cars off this yard. This

person was taken to court after an authorization and the City will be able to go on this business' property if the owner does not comply.

- Many of the people in the London Woods neighborhood are elderly or single and they are afraid to vocalize issues.
- The Foundation at one point had given a grant to public transit to improve their website.
- There is an urban agriculture initiative that began through the work through the foundation. People grow and sell at the Farmers' Market and this was a micro food hub. They are also forming a Growers' Cooperative that is spinning out into a for-profit business.
- There are additional neighborhood farmers' markets and there are attempts to start corner stores.
- Much of the urban agriculture initiatives have been done on small lots and some are leased from the City. This also builds community through the Urban Farm Festival. This tackles some of the food insecurity.
- Additionally, the foundation provides insurance for neighborhood groups that would like to have an urban garden.

The meeting ended at 7:03pm.

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D. Appendix D – HMDA Data

Attached are the HMDA Data Tables.

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E. Appendix E – Joint Statement of HUD and DOJ

Attached is the Joint Statement issued by HUD and the DOJ on the application of the Fair Housing Act on State and Local Governments.

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U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF FAIR HOUSING AND EQUAL OPPORTUNITY



U.S. DEPARTMENT OF JUSTICE
CIVIL RIGHTS DIVISION

Washington, D.C.
November 10, 2016

**JOINT STATEMENT OF THE DEPARTMENT OF HOUSING AND URBAN
DEVELOPMENT AND THE DEPARTMENT OF JUSTICE**

**STATE AND LOCAL LAND USE LAWS AND PRACTICES AND THE APPLICATION
OF THE FAIR HOUSING ACT**

INTRODUCTION

The Department of Justice (“DOJ”) and the Department of Housing and Urban Development (“HUD”) are jointly responsible for enforcing the Federal Fair Housing Act (“the Act”),¹ which prohibits discrimination in housing on the basis of race, color, religion, sex, disability, familial status (children under 18 living with a parent or guardian), or national origin.² The Act prohibits housing-related policies and practices that exclude or otherwise discriminate against individuals because of protected characteristics.

The regulation of land use and zoning is traditionally reserved to state and local governments, except to the extent that it conflicts with requirements imposed by the Fair Housing Act or other federal laws. This Joint Statement provides an overview of the Fair Housing Act’s requirements relating to state and local land use practices and zoning laws, including conduct related to group homes. It updates and expands upon DOJ’s and HUD’s Joint

¹ The Fair Housing Act is codified at 42 U.S.C. §§ 3601–19.

² The Act uses the term “handicap” instead of “disability.” Both terms have the same legal meaning. *See Bragdon v. Abbott*, 524 U.S. 624, 631 (1998) (noting that the definition of “disability” in the Americans with Disabilities Act

Statement on Group Homes, Local Land Use, and the Fair Housing Act, issued on August 18, 1999. The first section of the Joint Statement, Questions 1–6, describes generally the Act’s requirements as they pertain to land use and zoning. The second and third sections, Questions 7–25, discuss more specifically how the Act applies to land use and zoning laws affecting housing for persons with disabilities, including guidance on regulating group homes and the requirement to provide reasonable accommodations. The fourth section, Questions 26–27, addresses HUD’s and DOJ’s enforcement of the Act in the land use and zoning context.

This Joint Statement focuses on the Fair Housing Act, not on other federal civil rights laws that prohibit state and local governments from adopting or implementing land use and zoning practices that discriminate based on a protected characteristic, such as Title II of the Americans with Disabilities Act (“ADA”),³ Section 504 of the Rehabilitation Act of 1973 (“Section 504”),⁴ and Title VI of the Civil Rights Act of 1964.⁵ In addition, the Joint Statement does not address a state or local government’s duty to affirmatively further fair housing, even though state and local governments that receive HUD assistance are subject to this duty. For additional information provided by DOJ and HUD regarding these issues, see the list of resources provided in the answer to Question 27.

Questions and Answers on the Fair Housing Act and State and Local Land Use Laws and Zoning

1. How does the Fair Housing Act apply to state and local land use and zoning?

The Fair Housing Act prohibits a broad range of housing practices that discriminate against individuals on the basis of race, color, religion, sex, disability, familial status, or national origin (commonly referred to as protected characteristics). As established by the Supremacy Clause of the U.S. Constitution, federal laws such as the Fair Housing Act take precedence over conflicting state and local laws. The Fair Housing Act thus prohibits state and local land use and zoning laws, policies, and practices that discriminate based on a characteristic protected under the Act. Prohibited practices as defined in the Act include making unavailable or denying housing because of a protected characteristic. Housing includes not only buildings intended for occupancy as residences, but also vacant land that may be developed into residences.

is drawn almost verbatim “from the definition of ‘handicap’ contained in the Fair Housing Amendments Act of 1988”). This document uses the term “disability,” which is more generally accepted.

³ 42 U.S.C. §12132.

⁴ 29 U.S.C. § 794.

⁵ 42 U.S.C. § 2000d.

2. What types of land use and zoning laws or practices violate the Fair Housing Act?

Examples of state and local land use and zoning laws or practices that may violate the Act include:

- Prohibiting or restricting the development of housing based on the belief that the residents will be members of a particular protected class, such as race, disability, or familial status, by, for example, placing a moratorium on the development of multifamily housing because of concerns that the residents will include members of a particular protected class.
- Imposing restrictions or additional conditions on group housing for persons with disabilities that are not imposed on families or other groups of unrelated individuals, by, for example, requiring an occupancy permit for persons with disabilities to live in a single-family home while not requiring a permit for other residents of single-family homes.
- Imposing restrictions on housing because of alleged public safety concerns that are based on stereotypes about the residents' or anticipated residents' membership in a protected class, by, for example, requiring a proposed development to provide additional security measures based on a belief that persons of a particular protected class are more likely to engage in criminal activity.
- Enforcing otherwise neutral laws or policies differently because of the residents' protected characteristics, by, for example, citing individuals who are members of a particular protected class for violating code requirements for property upkeep while not citing other residents for similar violations.
- Refusing to provide reasonable accommodations to land use or zoning policies when such accommodations may be necessary to allow persons with disabilities to have an equal opportunity to use and enjoy the housing, by, for example, denying a request to modify a setback requirement so an accessible sidewalk or ramp can be provided for one or more persons with mobility disabilities.

3. When does a land use or zoning practice constitute intentional discrimination in violation of the Fair Housing Act?

Intentional discrimination is also referred to as disparate treatment, meaning that the action treats a person or group of persons differently because of race, color, religion, sex, disability, familial status, or national origin. A land use or zoning practice may be intentionally discriminatory even if there is no personal bias or animus on the part of individual government officials. For example, municipal zoning practices or decisions that reflect acquiescence to community bias may be intentionally discriminatory, even if the officials themselves do not personally share such bias. (See Q&A 5.) Intentional discrimination does not require that the

decision-makers were hostile toward members of a particular protected class. Decisions motivated by a purported desire to benefit a particular group can also violate the Act if they result in differential treatment because of a protected characteristic.

A land use or zoning practice may be discriminatory on its face. For example, a law that requires persons with disabilities to request permits to live in single-family zones while not requiring persons without disabilities to request such permits violates the Act because it treats persons with disabilities differently based on their disability. Even a law that is seemingly neutral will still violate the Act if enacted with discriminatory intent. In that instance, the analysis of whether there is intentional discrimination will be based on a variety of factors, all of which need not be satisfied. These factors include, but are not limited to: (1) the “impact” of the municipal practice, such as whether an ordinance disproportionately impacts minority residents compared to white residents or whether the practice perpetuates segregation in a neighborhood or particular geographic area; (2) the “historical background” of the action, such as whether there is a history of segregation or discriminatory conduct by the municipality; (3) the “specific sequence of events,” such as whether the city adopted an ordinance or took action only after significant, racially-motivated community opposition to a housing development or changed course after learning that a development would include non-white residents; (4) departures from the “normal procedural sequence,” such as whether a municipality deviated from normal application or zoning requirements; (5) “substantive departures,” such as whether the factors usually considered important suggest that a state or local government should have reached a different result; and (6) the “legislative or administrative history,” such as any statements by members of the state or local decision-making body.⁶

4. Can state and local land use and zoning laws or practices violate the Fair Housing Act if the state or locality did not intend to discriminate against persons on a prohibited basis?

Yes. Even absent a discriminatory intent, state or local governments may be liable under the Act for any land use or zoning law or practice that has an unjustified discriminatory effect because of a protected characteristic. In 2015, the United States Supreme Court affirmed this interpretation of the Act in *Texas Department of Housing and Community Affairs v. Inclusive Communities Project, Inc.*⁷ The Court stated that “[t]hese unlawful practices include zoning laws and other housing restrictions that function unfairly to exclude minorities from certain neighborhoods without any sufficient justification.”⁸

⁶ *Vill. of Arlington Heights v. Metro. Hous. Dev. Corp.*, 429 U.S. 252, 265–68 (1977).

⁷ ___ U.S. ___, 135 S. Ct. 2507 (2015).

⁸ *Id.* at 2521–22.

A land use or zoning practice results in a discriminatory effect if it caused or predictably will cause a disparate impact on a group of persons or if it creates, increases, reinforces, or perpetuates segregated housing patterns because of a protected characteristic. A state or local government still has the opportunity to show that the practice is necessary to achieve one or more of its substantial, legitimate, nondiscriminatory interests. These interests must be supported by evidence and may not be hypothetical or speculative. If these interests could not be served by another practice that has a less discriminatory effect, then the practice does not violate the Act. The standard for evaluating housing-related practices with a discriminatory effect are set forth in HUD's Discriminatory Effects Rule, 24 C.F.R § 100.500.

Examples of land use practices that violate the Fair Housing Act under a discriminatory effects standard include minimum floor space or lot size requirements that increase the size and cost of housing if such an increase has the effect of excluding persons from a locality or neighborhood because of their membership in a protected class, without a legally sufficient justification. Similarly, prohibiting low-income or multifamily housing may have a discriminatory effect on persons because of their membership in a protected class and, if so, would violate the Act absent a legally sufficient justification.

5. Does a state or local government violate the Fair Housing Act if it considers the fears or prejudices of community members when enacting or applying its zoning or land use laws respecting housing?

When enacting or applying zoning or land use laws, state and local governments may not act because of the fears, prejudices, stereotypes, or unsubstantiated assumptions that community members may have about current or prospective residents because of the residents' protected characteristics. Doing so violates the Act, even if the officials themselves do not personally share such bias. For example, a city may not deny zoning approval for a low-income housing development that meets all zoning and land use requirements because the development may house residents of a particular protected class or classes whose presence, the community fears, will increase crime and lower property values in the surrounding neighborhood. Similarly, a local government may not block a group home or deny a requested reasonable accommodation in response to neighbors' stereotypical fears or prejudices about persons with disabilities or a particular type of disability. Of course, a city council or zoning board is not bound by everything that is said by every person who speaks at a public hearing. It is the record as a whole that will be determinative.

6. Can state and local governments violate the Fair Housing Act if they adopt or implement restrictions against children?

Yes. State and local governments may not impose restrictions on where families with children may reside unless the restrictions are consistent with the “housing for older persons” exemption of the Act. The most common types of housing for older persons that may qualify for this exemption are: (1) housing intended for, and solely occupied by, persons 62 years of age or older; and (2) housing in which 80% of the occupied units have at least one person who is 55 years of age or older that publishes and adheres to policies and procedures demonstrating the intent to house older persons. These types of housing must meet all requirements of the exemption, including complying with HUD regulations applicable to such housing, such as verification procedures regarding the age of the occupants. A state or local government that zones an area to exclude families with children under 18 years of age must continually ensure that housing in that zone meets all requirements of the exemption. If all of the housing in that zone does not continue to meet all such requirements, that state or local government violates the Act.

**Questions and Answers on the Fair Housing Act and
Local Land Use and Zoning Regulation of Group Homes**

7. Who qualifies as a person with a disability under the Fair Housing Act?

The Fair Housing Act defines a person with a disability to include (1) individuals with a physical or mental impairment that substantially limits one or more major life activities; (2) individuals who are regarded as having such an impairment; and (3) individuals with a record of such an impairment.

The term “physical or mental impairment” includes, but is not limited to, diseases and conditions such as orthopedic, visual, speech and hearing impairments, cerebral palsy, autism, epilepsy, muscular dystrophy, multiple sclerosis, cancer, heart disease, diabetes, HIV infection, developmental disabilities, mental illness, drug addiction (other than addiction caused by current, illegal use of a controlled substance), and alcoholism.

The term “major life activity” includes activities such as seeing, hearing, walking, breathing, performing manual tasks, caring for one’s self, learning, speaking, and working. This list of major life activities is not exhaustive.

Being regarded as having a disability means that the individual is treated as if he or she has a disability even though the individual may not have an impairment or may not have an impairment that substantially limits one or more major life activities. For example, if a landlord

refuses to rent to a person because the landlord believes the prospective tenant has a disability, then the landlord violates the Act's prohibition on discrimination on the basis of disability, even if the prospective tenant does not actually have a physical or mental impairment that substantially limits one or more major life activities.

Having a record of a disability means the individual has a history of, or has been misclassified as having, a mental or physical impairment that substantially limits one or more major life activities.

8. What is a group home within the meaning of the Fair Housing Act?

The term "group home" does not have a specific legal meaning; land use and zoning officials and the courts, however, have referred to some residences for persons with disabilities as group homes. The Fair Housing Act prohibits discrimination on the basis of disability, and persons with disabilities have the same Fair Housing Act protections whether or not their housing is considered a group home. A household where two or more persons with disabilities choose to live together, as a matter of association, may not be subjected to requirements or conditions that are not imposed on households consisting of persons without disabilities.

In this Statement, the term "group home" refers to a dwelling that is or will be occupied by unrelated persons with disabilities. Sometimes group homes serve individuals with a particular type of disability, and sometimes they serve individuals with a variety of disabilities. Some group homes provide residents with in-home support services of varying types, while others do not. The provision of support services is not required for a group home to be protected under the Fair Housing Act. Group homes, as discussed in this Statement, may be opened by individuals or by organizations, both for-profit and not-for-profit. Sometimes it is the group home operator or developer, rather than the individuals who live or are expected to live in the home, who interacts with a state or local government agency about developing or operating the group home, and sometimes there is no interaction among residents or operators and state or local governments.

In this Statement, the term "group home" includes homes occupied by persons in recovery from alcohol or substance abuse, who are persons with disabilities under the Act. Although a group home for persons in recovery may commonly be called a "sober home," the term does not have a specific legal meaning, and the Act treats persons with disabilities who reside in such homes no differently than persons with disabilities who reside in other types of group homes. Like other group homes, homes for persons in recovery are sometimes operated by individuals or organizations, both for-profit and not-for-profit, and support services or supervision are sometimes, but not always, provided. The Act does not require a person who resides in a home for persons in recovery to have participated in or be currently participating in a

substance abuse treatment program to be considered a person with a disability. The fact that a resident of a group home may currently be illegally using a controlled substance does not deprive the other residents of the protection of the Fair Housing Act.

9. In what ways does the Fair Housing Act apply to group homes?

The Fair Housing Act prohibits discrimination on the basis of disability, and persons with disabilities have the same Fair Housing Act protections whether or not their housing is considered a group home. State and local governments may not discriminate against persons with disabilities who live in group homes. Persons with disabilities who live in or seek to live in group homes are sometimes subjected to unlawful discrimination in a number of ways, including those discussed in the preceding Section of this Joint Statement. Discrimination may be intentional; for example, a locality might pass an ordinance prohibiting group homes in single-family neighborhoods or prohibiting group homes for persons with certain disabilities. These ordinances are facially discriminatory, in violation of the Act. In addition, as discussed more fully in Q&A 10 below, a state or local government may violate the Act by refusing to grant a reasonable accommodation to its zoning or land use ordinance when the requested accommodation may be necessary for persons with disabilities to have an equal opportunity to use and enjoy a dwelling. For example, if a locality refuses to waive an ordinance that limits the number of unrelated persons who may live in a single-family home where such a waiver may be necessary for persons with disabilities to have an equal opportunity to use and enjoy a dwelling, the locality violates the Act unless the locality can prove that the waiver would impose an undue financial and administrative burden on the local government or fundamentally alter the essential nature of the locality's zoning scheme. Furthermore, a state or local government may violate the Act by enacting an ordinance that has an unjustified discriminatory effect on persons with disabilities who seek to live in a group home in the community. Unlawful actions concerning group homes are discussed in more detail throughout this Statement.

10. What is a reasonable accommodation under the Fair Housing Act?

The Fair Housing Act makes it unlawful to refuse to make “reasonable accommodations” to rules, policies, practices, or services, when such accommodations may be necessary to afford persons with disabilities an equal opportunity to use and enjoy a dwelling. A “reasonable accommodation” is a change, exception, or adjustment to a rule, policy, practice, or service that may be necessary for a person with a disability to have an equal opportunity to use and enjoy a dwelling, including public and common use spaces. Since rules, policies, practices, and services may have a different effect on persons with disabilities than on other persons, treating persons with disabilities exactly the same as others may sometimes deny them an equal opportunity to use and enjoy a dwelling.

Even if a zoning ordinance imposes on group homes the same restrictions that it imposes on housing for other groups of unrelated persons, a local government may be required, in individual cases and when requested to do so, to grant a reasonable accommodation to a group home for persons with disabilities. What constitutes a reasonable accommodation is a case-by-case determination based on an individualized assessment. This topic is discussed in detail in Q&As 20–25 and in the HUD/DOJ Joint Statement on Reasonable Accommodations under the Fair Housing Act.

11. Does the Fair Housing Act protect persons with disabilities who pose a “direct threat” to others?

The Act does not allow for the exclusion of individuals based upon fear, speculation, or stereotype about a particular disability or persons with disabilities in general. Nevertheless, the Act does not protect an individual whose tenancy would constitute a “direct threat” to the health or safety of other individuals or whose tenancy would result in substantial physical damage to the property of others unless the threat or risk to property can be eliminated or significantly reduced by reasonable accommodation. A determination that an individual poses a direct threat must rely on an individualized assessment that is based on reliable objective evidence (for example, current conduct or a recent history of overt acts). The assessment must consider: (1) the nature, duration, and severity of the risk of injury; (2) the probability that injury will actually occur; and (3) whether there are any reasonable accommodations that will eliminate or significantly reduce the direct threat. See Q&A 10 for a general discussion of reasonable accommodations. Consequently, in evaluating an individual’s recent history of overt acts, a state or local government must take into account whether the individual has received intervening treatment or medication that has eliminated or significantly reduced the direct threat (in other words, significant risk of substantial harm). In such a situation, the state or local government may request that the individual show how the circumstances have changed so that he or she no longer poses a direct threat. Any such request must be reasonable and limited to information necessary to assess whether circumstances have changed. Additionally, in such a situation, a state or local government may obtain satisfactory and reasonable assurances that the individual will not pose a direct threat during the tenancy. The state or local government must have reliable, objective evidence that the tenancy of a person with a disability poses a direct threat before excluding him or her from housing on that basis, and, in making that assessment, the state or local government may not ignore evidence showing that the individual’s tenancy would no longer pose a direct threat. Moreover, the fact that one individual may pose a direct threat does not mean that another individual with the same disability or other individuals in a group home may be denied housing.

12. Can a state or local government enact laws that specifically limit group homes for individuals with specific types of disabilities?

No. Just as it would be illegal to enact a law for the purpose of excluding or limiting group homes for individuals with disabilities, it is illegal under the Act for local land use and zoning laws to exclude or limit group homes for individuals with specific types of disabilities. For example, a government may not limit group homes for persons with mental illness to certain neighborhoods. The fact that the state or local government complies with the Act with regard to group homes for persons with some types of disabilities will not justify discrimination against individuals with another type of disability, such as mental illness.

13. Can a state or local government limit the number of individuals who reside in a group home in a residential neighborhood?

Neutral laws that govern groups of unrelated persons who live together do not violate the Act so long as (1) those laws do not intentionally discriminate against persons on the basis of disability (or other protected class), (2) those laws do not have an unjustified discriminatory effect on the basis of disability (or other protected class), and (3) state and local governments make reasonable accommodations when such accommodations may be necessary for a person with a disability to have an equal opportunity to use and enjoy a dwelling.

Local zoning and land use laws that treat groups of unrelated persons with disabilities less favorably than similar groups of unrelated persons without disabilities violate the Fair Housing Act. For example, suppose a city's zoning ordinance defines a "family" to include up to a certain number of unrelated persons living together as a household unit, and gives such a group of unrelated persons the right to live in any zoning district without special permission from the city. If that ordinance also prohibits a group home having the same number of persons with disabilities in a certain district or requires it to seek a use permit, the ordinance would violate the Fair Housing Act. The ordinance violates the Act because it treats persons with disabilities less favorably than families and unrelated persons without disabilities.

A local government may generally restrict the ability of groups of unrelated persons to live together without violating the Act as long as the restrictions are imposed on all such groups, including a group defined as a family. Thus, if the definition of a family includes up to a certain number of unrelated individuals, an ordinance would not, on its face, violate the Act if a group home for persons with disabilities with more than the permitted number for a family were not allowed to locate in a single-family-zoned neighborhood because any group of unrelated people without disabilities of that number would also be disallowed. A facially neutral ordinance, however, still may violate the Act if it is intentionally discriminatory (that is, enacted with discriminatory intent or applied in a discriminatory manner), or if it has an unjustified

discriminatory effect on persons with disabilities. For example, an ordinance that limits the number of unrelated persons who may constitute a family may violate the Act if it is enacted for the purpose of limiting the number of persons with disabilities who may live in a group home, or if it has the unjustified discriminatory effect of excluding or limiting group homes in the jurisdiction. Governments may also violate the Act if they enforce such restrictions more strictly against group homes than against groups of the same number of unrelated persons without disabilities who live together in housing. In addition, as discussed in detail below, because the Act prohibits the denial of reasonable accommodations to rules and policies for persons with disabilities, a group home that provides housing for a number of persons with disabilities that exceeds the number allowed under the family definition has the right to seek an exception or waiver. If the criteria for a reasonable accommodation are met, the permit must be given in that instance, but the ordinance would not be invalid.⁹

14. How does the Supreme Court's ruling in *Olmstead* apply to the Fair Housing Act?

In *Olmstead v. L.C.*,¹⁰ the Supreme Court ruled that the Americans with Disabilities Act (ADA) prohibits the unjustified segregation of persons with disabilities in institutional settings where necessary services could reasonably be provided in integrated, community-based settings. An integrated setting is one that enables individuals with disabilities to live and interact with individuals without disabilities to the fullest extent possible. By contrast, a segregated setting includes congregate settings populated exclusively or primarily by individuals with disabilities. Although *Olmstead* did not interpret the Fair Housing Act, the objectives of the Fair Housing Act and the ADA, as interpreted in *Olmstead*, are consistent. The Fair Housing Act ensures that persons with disabilities have an equal opportunity to choose the housing where they wish to live. The ADA and *Olmstead* ensure that persons with disabilities also have the option to live and receive services in the most integrated setting appropriate to their needs. The integration mandate of the ADA and *Olmstead* can be implemented without impairing the rights protected by the Fair Housing Act. For example, state and local governments that provide or fund housing, health care, or support services must comply with the integration mandate by providing these programs, services, and activities in the most integrated setting appropriate to the needs of individuals with disabilities. State and local governments may comply with this requirement by adopting standards for the housing, health care, or support services they provide or fund that are reasonable, individualized, and specifically tailored to enable individuals with disabilities to live and interact with individuals without disabilities to the fullest extent possible. Local governments should be aware that ordinances and policies that impose additional restrictions on housing or residential services for persons with disabilities that are not imposed on housing or

⁹ Laws that limit the number of occupants per unit do not violate the Act as long as they are reasonable, are applied to all occupants, and do not operate to discriminate on the basis of disability, familial status, or other characteristics protected by the Act.

¹⁰ 527 U.S. 581 (1999).

residential services for persons without disabilities are likely to violate the Act. In addition, a locality would violate the Act and the integration mandate of the ADA and *Olmstead* if it required group homes to be concentrated in certain areas of the jurisdiction by, for example, restricting them from being located in other areas.

15. Can a state or local government impose spacing requirements on the location of group homes for persons with disabilities?

A “spacing” or “dispersal” requirement generally refers to a requirement that a group home for persons with disabilities must not be located within a specific distance of another group home. Sometimes a spacing requirement is designed so it applies only to group homes and sometimes a spacing requirement is framed more generally and applies to group homes and other types of uses such as boarding houses, student housing, or even certain types of businesses. In a community where a certain number of unrelated persons are permitted by local ordinance to reside together in a home, it would violate the Act for the local ordinance to impose a spacing requirement on group homes that do not exceed that permitted number of residents because the spacing requirement would be a condition imposed on persons with disabilities that is not imposed on persons without disabilities. In situations where a group home seeks a reasonable accommodation to exceed the number of unrelated persons who are permitted by local ordinance to reside together, the Fair Housing Act does not prevent state or local governments from taking into account concerns about the over-concentration of group homes that are located in close proximity to each other. Sometimes compliance with the integration mandate of the ADA and *Olmstead* requires government agencies responsible for licensing or providing housing for persons with disabilities to consider the location of other group homes when determining what housing will best meet the needs of the persons being served. Some courts, however, have found that spacing requirements violate the Fair Housing Act because they deny persons with disabilities an equal opportunity to choose where they will live. Because an across-the-board spacing requirement may discriminate against persons with disabilities in some residential areas, any standards that state or local governments adopt should evaluate the location of group homes for persons with disabilities on a case-by-case basis.

Where a jurisdiction has imposed a spacing requirement on the location of group homes for persons with disabilities, courts may analyze whether the requirement violates the Act under an intent, effects, or reasonable accommodation theory. In cases alleging intentional discrimination, courts look to a number of factors, including the effect of the requirement on housing for persons with disabilities; the jurisdiction’s intent behind the spacing requirement; the existence, size, and location of group homes in a given area; and whether there are methods other than a spacing requirement for accomplishing the jurisdiction’s stated purpose. A spacing requirement enacted with discriminatory intent, such as for the purpose of appeasing neighbors’ stereotypical fears about living near persons with disabilities, violates the Act. Further, a neutral

spacing requirement that applies to all housing for groups of unrelated persons may have an unjustified discriminatory effect on persons with disabilities, thus violating the Act. Jurisdictions must also consider, in compliance with the Act, requests for reasonable accommodations to any spacing requirements.

16. Can a state or local government impose health and safety regulations on group home operators?

Operators of group homes for persons with disabilities are subject to applicable state and local regulations addressing health and safety concerns unless those regulations are inconsistent with the Fair Housing Act or other federal law. Licensing and other regulatory requirements that may apply to some group homes must also be consistent with the Fair Housing Act. Such regulations must not be based on stereotypes about persons with disabilities or specific types of disabilities. State or local zoning and land use ordinances may not, consistent with the Fair Housing Act, require individuals with disabilities to receive medical, support, or other services or supervision that they do not need or want as a condition for allowing a group home to operate. State and local governments' enforcement of neutral requirements regarding safety, licensing, and other regulatory requirements governing group homes do not violate the Fair Housing Act so long as the ordinances are enforced in a neutral manner, they do not specifically target group homes, and they do not have an unjustified discriminatory effect on persons with disabilities who wish to reside in group homes.

Governments must also consider requests for reasonable accommodations to licensing and regulatory requirements and procedures, and grant them where they may be necessary to afford individuals with disabilities an equal opportunity to use and enjoy a dwelling, as required by the Act.

17. Can a state or local government address suspected criminal activity or fraud and abuse at group homes for persons with disabilities?

The Fair Housing Act does not prevent state and local governments from taking nondiscriminatory action in response to criminal activity, insurance fraud, Medicaid fraud, neglect or abuse of residents, or other illegal conduct occurring at group homes, including reporting complaints to the appropriate state or federal regulatory agency. States and localities must ensure that actions to enforce criminal or other laws are not taken to target group homes and are applied equally, regardless of whether the residents of housing are persons with disabilities. For example, persons with disabilities residing in group homes are entitled to the same constitutional protections against unreasonable search and seizure as those without disabilities.

18. Does the Fair Housing Act permit a state or local government to implement strategies to integrate group homes for persons with disabilities in particular neighborhoods where they are not currently located?

Yes. Some strategies a state or local government could use to further the integration of group housing for persons with disabilities, consistent with the Act, include affirmative marketing or offering incentives. For example, jurisdictions may engage in affirmative marketing or offer variances to providers of housing for persons with disabilities to locate future homes in neighborhoods where group homes for persons with disabilities are not currently located. But jurisdictions may not offer incentives for a discriminatory purpose or that have an unjustified discriminatory effect because of a protected characteristic.

19. Can a local government consider the fears or prejudices of neighbors in deciding whether a group home can be located in a particular neighborhood?

In the same way a local government would violate the law if it rejected low-income housing in a community because of neighbors' fears that such housing would be occupied by racial minorities (see Q&A 5), a local government violates the law if it blocks a group home or denies a reasonable accommodation request because of neighbors' stereotypical fears or prejudices about persons with disabilities. This is so even if the individual government decision-makers themselves do not have biases against persons with disabilities.

Not all community opposition to requests by group homes is necessarily discriminatory. For example, when a group home seeks a reasonable accommodation to operate in an area and the area has limited on-street parking to serve existing residents, it is not a violation of the Fair Housing Act for neighbors and local government officials to raise concerns that the group home may create more demand for on-street parking than would a typical family and to ask the provider to respond. A valid unaddressed concern about inadequate parking facilities could justify denying the requested accommodation, if a similar dwelling that is not a group home or similarly situated use would ordinarily be denied a permit because of such parking concerns. If, however, the group home shows that the home will not create a need for more parking spaces than other dwellings or similarly-situated uses located nearby, or submits a plan to provide any needed off-street parking, then parking concerns would not support a decision to deny the home a permit.

Questions and Answers on the Fair Housing Act and Reasonable Accommodation Requests to Local Zoning and Land Use Laws

20. When does a state or local government violate the Fair Housing Act by failing to grant a request for a reasonable accommodation?

A state or local government violates the Fair Housing Act by failing to grant a reasonable accommodation request if (1) the persons requesting the accommodation or, in the case of a group home, persons residing in or expected to reside in the group home are persons with a disability under the Act; (2) the state or local government knows or should reasonably be expected to know of their disabilities; (3) an accommodation in the land use or zoning ordinance or other rules, policies, practices, or services of the state or locality was requested by or on behalf of persons with disabilities; (4) the requested accommodation may be necessary to afford one or more persons with a disability an equal opportunity to use and enjoy the dwelling; (5) the state or local government refused to grant, failed to act on, or unreasonably delayed the accommodation request; and (6) the state or local government cannot show that granting the accommodation would impose an undue financial and administrative burden on the local government or that it would fundamentally alter the local government's zoning scheme. A requested accommodation may be necessary if there is an identifiable relationship between the requested accommodation and the group home residents' disability. Further information is provided in Q&A 10 above and the HUD/DOJ Joint Statement on Reasonable Accommodations under the Fair Housing Act.

21. Can a local government deny a group home's request for a reasonable accommodation without violating the Fair Housing Act?

Yes, a local government may deny a group home's request for a reasonable accommodation if the request was not made by or on behalf of persons with disabilities (by, for example, the group home developer or operator) or if there is no disability-related need for the requested accommodation because there is no relationship between the requested accommodation and the disabilities of the residents or proposed residents.

In addition, a group home's request for a reasonable accommodation may be denied by a local government if providing the accommodation is not reasonable—in other words, if it would impose an undue financial and administrative burden on the local government or it would fundamentally alter the local government's zoning scheme. The determination of undue financial and administrative burden must be decided on a case-by-case basis involving various factors, such as the nature and extent of the administrative burden and the cost of the requested accommodation to the local government, the financial resources of the local government, and the benefits that the accommodation would provide to the persons with disabilities who will reside in the group home.

When a local government refuses an accommodation request because it would pose an undue financial and administrative burden, the local government should discuss with the requester whether there is an alternative accommodation that would effectively address the disability-related needs of the group home's residents without imposing an undue financial and administrative burden. This discussion is called an "interactive process." If an alternative accommodation would effectively meet the disability-related needs of the residents of the group home and is reasonable (that is, it would not impose an undue financial and administrative burden or fundamentally alter the local government's zoning scheme), the local government must grant the alternative accommodation. An interactive process in which the group home and the local government discuss the disability-related need for the requested accommodation and possible alternative accommodations is both required under the Act and helpful to all concerned, because it often results in an effective accommodation for the group home that does not pose an undue financial and administrative burden or fundamental alteration for the local government.

22. What is the procedure for requesting a reasonable accommodation?

The reasonable accommodation must actually be requested by or on behalf of the individuals with disabilities who reside or are expected to reside in the group home. When the request is made, it is not necessary for the specific individuals who would be expected to live in the group home to be identified. The Act does not require that a request be made in a particular manner or at a particular time. The group home does not need to mention the Fair Housing Act or use the words "reasonable accommodation" when making a reasonable accommodation request. The group home must, however, make the request in a manner that a reasonable person would understand to be a disability-related request for an exception, change, or adjustment to a rule, policy, practice, or service. When making a request for an exception, change, or adjustment to a local land use or zoning regulation or policy, the group home should explain what type of accommodation is being requested and, if the need for the accommodation is not readily apparent or known by the local government, explain the relationship between the accommodation and the disabilities of the group home residents.

A request for a reasonable accommodation can be made either orally or in writing. It is often helpful for both the group home and the local government if the reasonable accommodation request is made in writing. This will help prevent misunderstandings regarding what is being requested or whether or when the request was made.

Where a local land use or zoning code contains specific procedures for seeking a departure from the general rule, courts have decided that these procedures should ordinarily be followed. If no procedure is specified, or if the procedure is unreasonably burdensome or intrusive or involves significant delays, a request for a reasonable accommodation may,

nevertheless, be made in some other way, and a local government is obligated to grant it if the requested accommodation meets the criteria discussed in Q&A 20, above.

Whether or not the local land use or zoning code contains a specific procedure for requesting a reasonable accommodation or other exception to a zoning regulation, if local government officials have previously made statements or otherwise indicated that an application for a reasonable accommodation would not receive fair consideration, or if the procedure itself is discriminatory, then persons with disabilities living in a group home, and/or its operator, have the right to file a Fair Housing Act complaint in court to request an order for a reasonable accommodation to the local zoning regulations.

23. Does the Fair Housing Act require local governments to adopt formal reasonable accommodation procedures?

The Act does not require a local government to adopt formal procedures for processing requests for reasonable accommodations to local land use or zoning codes. DOJ and HUD nevertheless strongly encourage local governments to adopt formal procedures for identifying and processing reasonable accommodation requests and provide training for government officials and staff as to application of the procedures. Procedures for reviewing and acting on reasonable accommodation requests will help state and local governments meet their obligations under the Act to respond to reasonable accommodation requests and implement reasonable accommodations promptly. Local governments are also encouraged to ensure that the procedures to request a reasonable accommodation or other exception to local zoning regulations are well known throughout the community by, for example, posting them at a readily accessible location and in a digital format accessible to persons with disabilities on the government's website. If a jurisdiction chooses to adopt formal procedures for reasonable accommodation requests, the procedures cannot be onerous or require information beyond what is necessary to show that the individual has a disability and that the requested accommodation is related to that disability. For example, in most cases, an individual's medical record or detailed information about the nature of a person's disability is not necessary for this inquiry. In addition, officials and staff must be aware that any procedures for requesting a reasonable accommodation must also be flexible to accommodate the needs of the individual making a request, including accepting and considering requests that are not made through the official procedure. The adoption of a reasonable accommodation procedure, however, will not cure a zoning ordinance that treats group homes differently than other residential housing with the same number of unrelated persons.

24. What if a local government fails to act promptly on a reasonable accommodation request?

A local government has an obligation to provide prompt responses to reasonable accommodation requests, whether or not a formal reasonable accommodation procedure exists. A local government's undue delay in responding to a reasonable accommodation request may be deemed a failure to provide a reasonable accommodation.

25. Can a local government enforce its zoning code against a group home that violates the zoning code but has not requested a reasonable accommodation?

The Fair Housing Act does not prohibit a local government from enforcing its zoning code against a group home that has violated the local zoning code, as long as that code is not discriminatory or enforced in a discriminatory manner. If, however, the group home requests a reasonable accommodation when faced with enforcement by the locality, the locality still must consider the reasonable accommodation request. A request for a reasonable accommodation may be made at any time, so at that point, the local government must consider whether there is a relationship between the disabilities of the residents of the group home and the need for the requested accommodation. If so, the locality must grant the requested accommodation unless doing so would pose a fundamental alteration to the local government's zoning scheme or an undue financial and administrative burden to the local government.

**Questions and Answers on Fair Housing Act Enforcement of
Complaints Involving Land Use and Zoning**

26. How are Fair Housing Act complaints involving state and local land use laws and practices handled by HUD and DOJ?

The Act gives HUD the power to receive, investigate, and conciliate complaints of discrimination, including complaints that a state or local government has discriminated in exercising its land use and zoning powers. HUD may not issue a charge of discrimination pertaining to "the legality of any State or local zoning or other land use law or ordinance." Rather, after investigating, HUD refers matters it believes may be meritorious to DOJ, which, in its discretion, may decide to bring suit against the state or locality within 18 months after the practice at issue occurred or terminated. DOJ may also bring suit by exercising its authority to initiate litigation alleging a pattern or practice of discrimination or a denial of rights to a group of persons which raises an issue of general public importance.

If HUD determines that there is no reasonable cause to believe that there may be a violation, it will close an investigation without referring the matter to DOJ. But a HUD or DOJ

decision not to proceed with a land use or zoning matter does not foreclose private plaintiffs from pursuing a claim.

Litigation can be an expensive, time-consuming, and uncertain process for all parties. HUD and DOJ encourage parties to land use disputes to explore reasonable alternatives to litigation, including alternative dispute resolution procedures, like mediation or conciliation of the HUD complaint. HUD attempts to conciliate all complaints under the Act that it receives, including those involving land use or zoning laws. In addition, it is DOJ's policy to offer prospective state or local governments the opportunity to engage in pre-suit settlement negotiations, except in the most unusual circumstances.

27. How can I find more information?

For more information on reasonable accommodations and reasonable modifications under the Fair Housing Act:

- HUD/DOJ Joint Statement on Reasonable Accommodations under the Fair Housing Act, available at <https://www.justice.gov/crt/fair-housing-policy-statements-and-guidance-0> or <http://www.hud.gov/offices/fheo/library/huddojstatement.pdf>.
- HUD/DOJ Joint Statement on Reasonable Modifications under the Fair Housing Act, available at <https://www.justice.gov/crt/fair-housing-policy-statements-and-guidance-0> or http://www.hud.gov/offices/fheo/disabilities/reasonable_modifications_mar08.pdf.

For more information on state and local governments' obligations under Section 504:

- HUD website at http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/disabilities/sect504.

For more information on state and local governments' obligations under the ADA and *Olmstead*:

- U.S. Department of Justice website, www.ADA.gov, or call the ADA information line at (800) 514-0301 (voice) or (800) 514-0383 (TTY).
- 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.*, available at http://www.ada.gov./olmstead/q&a_olmstead.htm.
- Statement of the Department of Housing and Urban Development on the Role of Housing in Accomplishing the Goals of *Olmstead*, available at <http://portal.hud.gov/hudportal/documents/huddoc?id=OlmsteadGuidnc060413.pdf>.

For more information on the requirement to affirmatively further fair housing:

- Affirmatively Furthering Fair Housing, 80 Fed. Reg. 42,272 (July 16, 2015) (to be codified at 24 C.F.R. pts. 5, 91, 92, 570, 574, 576, and 903).
- U.S. Department of Housing and Urban Development, Version 1, Affirmatively Furthering Fair Housing Rule Guidebook (2015), *available at* <https://www.hudexchange.info/resources/documents/AFFH-Rule-Guidebook.pdf>.
- Office of Fair Housing and Equal Opportunity, U.S. Department of Housing and Urban Development, Vol. 1, Fair Housing Planning Guide (1996), *available at* <http://www.hud.gov/offices/fheo/images/fhpg.pdf>.

For more information on nuisance and crime-free ordinances:

- Office of General Counsel Guidance on Application of Fair Housing Act Standards to the Enforcement of Local Nuisance and Crime-Free Housing Ordinances Against Victims of Domestic Violence, Other Crime Victims, and Others Who Require Police or Emergency Services (Sept. 13, 2016), *available at* <http://portal.hud.gov/hudportal/documents/huddoc?id=FinalNuisanceOrdGdnce.pdf>.

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