

Affirmatively Furthering Fair Housing (AFFH)

Affirmatively furthering fair housing (24 C.F.R. § 5.152) means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. The duty to affirmatively further fair housing extends to all of a program participant's activities and programs relating to housing and urban development.



Fair housing choice is not only about combating discrimination

Fair housing choice involves individuals and families having the information, opportunity, and options to live where they choose without unlawful discrimination and other barriers related to race, color, religion, sex, familial status, national origin, or disability, and that their choices realistically include housing options in integrated areas and areas with access to opportunity. Fair housing choice encompasses (1) actual choice, which means the existence of realistic housing options; (2) protected choice, which means housing that can be accessed without discrimination; and (3) enabled choice, which means realistic access to sufficient information regarding options so that any choice is informed. For persons with disabilities, fair housing choice and access to opportunity include access to accessible housing and housing in the most integrated setting appropriate to an individual's needs.



Fair Housing Plan Components

1. Cover sheet and Certification
2. Summary of fair housing issues and capacity: NC State Impediments to Fair Housing Choice and Local issues if different from the State Impediments to Fair Housing Choice (http://portal.ncdenr.org/c/document_library/get_file?uuid=5cb596be-f737-4a42-ad40-c0bab9d0c36a&groupId=14655572).
3. Analysis of data:
 - a. NC State data
 - b. Local data and local knowledge
4. Fair housing data:
 - a. Contributing factors to the issues
 - b. Existing programs or activities that are supporting Fair Housing if any
5. Identification of fair housing priorities and goals: SMART Goals – Fair Housing Activities
6. Summary of community participation

Action must be meaningful and strategic to AFFH. A strategy that may affirmatively furthering fair housing in one context may not work in another. Additionally, to affirmatively further fair housing, actions need to be meaningful. This means that they are designed and can be reasonably expected to achieve a material positive change.

Fair Housing Plan (FHP)

1. Cover sheet and Certification

Grantee: Town of Enfield

Recipient's Address: P.O. Box 699, Enfield, NC 27823

Contact Person: Brenda Silver
(Fair Housing Officer)

Contact Email: bsilver@enfieldnc.org

Contact Phone #: (252) 445-3146

Telecommunications Device for the Deaf (TDD)/Teletypewriter (TTY) number: 1-866-324-7474

Period covered by this plan:

June 15, 2020 through June 15, 2023

Check one:	
Initial	<input type="checkbox"/>
Amended	<input type="checkbox"/>
Renewal FHP	<input checked="" type="checkbox"/>

1. To the best of its knowledge and belief, the statements and information contained herein are true, accurate, and complete and the program participant has developed this analysis in compliance with the requirements of 24 C.F.R. § 5.152 or comparable replacement regulations of the Department of Housing and Urban Development;
2. The program participant will take meaningful actions to further the goals identified in its analysis conducted in accordance with the requirements in 24 C.F.R. § 5.152 and 24 C.F.R. §§ 91.225(a)(1), 91.325(a)(1), 91.425(a)(1), 570.487(b)(1), 570.601, 903.7(o), and 903.15(d), as applicable.

Approved and adopted,


Mayor Wayne Anderson


Brenda Silver, Town Clerk

2. Summary of fair housing issues and capacity:

State of North Carolina Impediments

Private Sector

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

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

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

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

Public Sector

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

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

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

Local Impediments (Describe the Fair Housing issues known by the Town/City/County):

Lack of understanding of fair housing laws among housing consumers in rural Towns. This impediment was identified through a review of the responses to the 2020 Enfield Fair Housing Survey distributed by the Town.

3. Analysis of data:

The Town of Enfield has maintained a stable population, with slight peak in 2010. According to the 2018 US Census American Community Survey (ACS), the Town of Enfield had an estimated population of 2,322 people. This is a decrease from the 2,532 people indicated in the 2010 US Census. When compared to the 2000 US Census of 2,347, the Town has maintained a steady population over the 18-year span. Conversely, there is an increase in the number of households in the Town; 846 households in 2010 US Census and an estimated 952 households in the 2018 ACS.

The Town is a predominately Black/African American community. Of the 2,322 people living in the Town, 2,080 are Black/African American (89.6%), 203 are White/Caucasian (8.7%), 32 are American Indian (1.4%), 7 are Native Hawaiian/Pacific Islander (0.3%) and 3 are Other (0.1%). The 2010 ACS shows that out of the 2,560 total population, 89.8% of the Town were Black/African American and 10.2% were White/Caucasian.

The number of individuals under the age of 18 shrank from 915 in 2010 to 523 in 2018 ACS. This is emphasized by the number of households with children under the age of 18 dropping from 411 households in 2010 to 338 households in 2018. That represents a 13.1% change when compared to the total number of households in the Town. In the same time, there has been an increase in the total population over the age of 65; 2010 – 320 (12.5%); 2018 – 378 (16.3%). According to the ACS, the median age for the Town has increased 8.3 years from 28.7 years in 2010 to 37 years in 2018. It can be deduced that the Town of Enfield is experiencing an aging population.

Compared to North Carolina, the Town of Enfield is aging more rapidly than the overall state. North Carolina experienced an increase of 1.6 years in median age from 37.3 years in 2010 to 38.9 years in 2018. While the percent change in the population over the age of 65 is similar from 2010 to 2018 (increase from 12.5% to 16.3% for Enfield and an increase from 13% to 16.3% for North Carolina), the difference is seen in the change in percentage of individuals under the age of 18. North Carolina experienced a decrease in percentage of individuals under the age of 18 from 23.9% in 2010 to 22.1% in 2018. This is a 1.8% decrease compared to the 13.2% decrease experienced in the Town of Enfield.

According to the 2018 ACS, the median household income in the Town of Enfield is \$22,194 with 540 households (56.7%) of the 952 total households having earned income.

This is 35.2% less than the median household income of \$34,251 for Halifax County. In the Town, 522 households (54.8%) receive SNAP/food assistance and 248 households (26.1%) receive Supplemental Security Income.

Of the 952 occupied units in the Town of Enfield, 301 units (31.6%) are owner occupied and 651 (68.4%) are renter occupied according to the 2018 ACS. In 2010, 333 (39.4%) units were owner occupied and 513 units (60.6%) were renter occupied out of the 846 occupied units in the Town. The number of total occupied units have increased since 2010, however, occupancy is trending from owner occupied to renter.

According to the 2018 ACS, housing stock is relatively older within the Town with 787 (68.4%) of the total 1,150 available housing units being constructed before 1970. The data also shows no new units constructed after 2009. The units are single family in nature as 900 units (78.2%) are Single Family detached units and 30 units (2.7%) are Mobile Homes.

4. Assessment of data:

The demographics for the Town of Enfield point to a community that has a stable, but aging population. A large portion of the Town rely upon income assistance (54.8% SNAP and 26.1% SSI) and the Town maintains a lower median household income than the Tier 1 county in which it is located (as designated by the NC Department of Commerce).

Identified Fair Housing Issues and Contributing Factors

1. Fair Housing Outreach and Resources
 - a. Lack of resources for fair housing agencies and organizations:
 - i. There are limited local options to receive Fair Housing Training. The nearest trainings hosted by the Fair Housing Project were located an hour away from Enfield and were concentrated in larger cities.
 - b. Lack of local private and public Fair Housing enforcement and outreach:
 - i. Locally, there appeared to be no robust outreach, education, or enforcement efforts for fair housing.
2. Disproportionate Housing Needs
 - a. The available units in a range of sizes:
 - i. The community was surveyed as a part of this assessment and there was a consensus that the Town needed more affordable apartments and homes to rent.
 - b. Lack of private investment in specific neighborhoods:
 - i. As with what was stated above, it has been noted that there could be an improvement in the quality of available rental options within the Town.

Existing programs or activities that are supporting Fair Housing if any (Describe):

The Town does not currently conduct formal programs supporting Fair Housing.

5. Identification of fair housing priorities and goals: SMART Goals – Fair Housing Activities:

Goal	Contributing Factor	Fair Housing Issue(s)	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)
Educate Town Officials in Fair Housing Law	Lack of resources for fair housing agencies and organizations	Enforcement, Outreach Capacity and Resources	Increase in the number of Fair Housing workshops/trainings attended. Measured annually at the end of the fiscal year	Town Clerk and other Town officials
Educate Residents about Fair Housing Resources	Lack of local private/public fair housing outreach and enforcement	Enforcement, Outreach Capacity and Resources	Work with other agencies to increase awareness and advocate for affordable and fair housing. Measured over the term of the grant by number of outreach efforts	Town of Enfield Staff and Elected Officials
Promote Town as a site for affordable housing development	Lack of private investment in specific neighborhoods	Disproportionate Housing Needs	Increase outreach to potential affordable housing developers	Town of Enfield Staff or consultant



Quarterly Fair Housing Activity	Months	Year	Estimated Cost	Actual Cost
Establishing and publishing the grantee's fair housing complaint procedure and TDD number in the local newspaper	Jan-Mar	2020	\$100	
Post Fair Housing Posters in Town Hall (and other municipal buildings) and on the Town website	Apr-June	2020	N/A	
Distribute Fair Housing brochures to citizens by placing them in utility bill mailing	July-Sept	2020	N/A	
Send Town Clerk and/or Elected Official to Fair Housing Training	Oct-Dec (based on availability)	2020	\$75	
Place ad/article in the local newspaper promoting Fair Housing. Article will include TDD number	Jan-Mar	2021	\$100	
In celebration of National Fair Housing Month in April, The Town will support Regional Fair Housing Events and promote Fair Housing practices	Apr-June	2021	N/A	
Attend Annual Fair Housing Conference	Apr-June	2021	\$15/person	
Outreach to potential affordable housing developers and other housing market professionals	July-Sept	2021	N/A	
Send Town Clerk and/or Elected Official to Fair Housing Training	Oct-Dec (based on availability)	2021	\$75	



Place ad/article in the local newspaper promoting Fair Housing. Article will include TDD number	Jan-Mar	2022	\$100	
In celebration of National Fair Housing Month in April, The Town will support Regional Fair Housing Events and Fair Housing practices	Apr-June	2022	N/A	
Participate in a scheduled Fair Housing event	July-Sept (based on availability)	2022	N/A	

6. Summary of community participation:

1. Outreach Activities

- a. A public notice was posted on the Town’s website and at Town Hall
- b. An advertisement of the June 15, 2020 Public Hearing was placed in the Roanoke Rapids Daily Herald
- c. A Fair Housing Survey was made available to the public for more than 30 days. The survey was available at Town Hall in hard copy, online via Google Forms, and distributed in monthly utility bills. 67 completed surveys were returned to the Town in hard copy and 22 were complete via Google Forms. The survey and responses are attached as Appendix B
- d. A draft plan was made available to the public at Town Hall and online from June 4, 2020 through June 15, 2020. The plan was adopted by the Enfield Board of Commissioners on June 23, 2020.

2. Organizations Consulted

- a. Roanoke-Chowan Housing Authority
- b. Halifax County
- c. NC Justice Center
- d. Legal Aid North Carolina
- e. Deerfield Apartments
- f. Carriage House Apartments

3. Success

Our initial round of survey collection led to very low response rate. This was, in part, due to the emergence of covid-19, the closing of municipal buildings, and the lack of an available online survey. The second round of survey collection yielded more responses as the Town reopened on Mondays, Wednesdays, and Fridays and the COG created an online Google Form to collect responses.



Reaching out to local and state agencies did not lead to meaningful participation. Agencies are reluctant to share information.

4. Comments Received

Many comments received via the surveys echoed the lack of affordable homes or apartments to rent within the Town.



Appendix A

Fair Housing Complaint Procedure

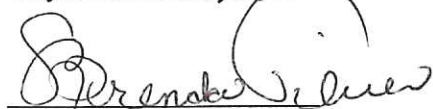
1. Any person or persons wishing to file a complaint of housing discrimination in the Town of Enfield, North Carolina may do so by informing the Town Clerk of the facts and circumstance of the alleged discriminatory acts or practice.

If a person does not want to file a complaint with the Town Clerk, they may pursue one of the following options:

- Visit the **NC Human Relations Commission** to file a discrimination complaint
 - Visit **HUD's website** to file a discrimination complaint
 - Visit the **US Department of Justice Civil Rights Division** to file a discrimination complaint
 - The **NC Fair Housing Project of Legal Aid North Carolina** is funded by a HUD Fair Housing Initiatives Program (FHIP) grant. The Fair Housing Project of NC is available to provide information concerning a person's rights under the Federal Fair Housing Act. When necessary, staff can also assist victims of housing discrimination in filing a complaint with HUD or other appropriate administrative or judicial bodies. For more information, or if you believe you have been a victim of housing discrimination, call the FHP's toll-free number: **1-855-797-FAIR (3247)**.
2. Upon receiving a housing discrimination complaint, the Town Clerk shall acknowledge the complaint within **10 days in writing** and inform the North Carolina Department of Commerce (NC DOC) – Rural Economic Development Division, and the North Carolina Human Relations commission about the complaint.
 3. The Town Clerk shall **offer assistance** to the Commission in the investigation and reconciliation of all housing discrimination complaints which are based on events occurring in the Town.
 4. The Town Clerk shall **publicize** in the local newspaper, with the TDD#, who is the local agency to contact with housing discrimination complaints.

Approved and adopted this 23rd day of June 2020.


Wayne Anderson, Mayor


Brenda Silver, Town Clerk



Appendix B

Town of Enfield Fair Housing Survey June 2020

Below are the survey results for a fair housing survey conducted in the months of April and May 2020. The survey was made available online via Google Forms and in hard copy form at Town offices and in utility bill mailings. Sixty-seven (67) completed surveys were received by the Town. Twenty-two (22) surveys were completed online. The survey responses are in **BOLD**.

It is illegal to discriminate in housing provision or transactions based on a person's race, national origin (e.g. Hispanic), color, religion, sex, familial status (children) or a disability. The Town of Enfield, NC is surveying its residents on fair housing issues in the Town of Enfield, in preparation for developing a plan to affirmatively further fair housing, as required by the HUD Community Development Block Grant (CDBG) program.

1. **Before reading the statement above, were you aware of the seven protected classes in cases of housing discrimination?** (race, national origin, color, religion, sex, familial status, disability)
 - Yes - **50**
 - Yes, some of them - **17**
 - No - **21**

2. **Do you think the residents of Enfield need more information on housing discrimination?**
 - Yes - **61**
 - No - **7**
 - I don't know - **21**

3. **Have you experienced or witnessed housing discrimination in Enfield?**
 - Yes - **19**
 - No - **58**
 - I'm not sure - **12**

4. **If you were to feel you were discriminated against in a housing transaction (buying, selling, renting, financing, or improving a residence), who would you notify?**
 - Town staff - **37**
 - A local elected official - **23**
 - A local nonprofit - **4**
 - Other - **23**

5. **Are there affordable housing options for everyone who wants to live in Enfield? If not, what types of housing are not available?**
 - We have enough affordable housing options in Enfield - **11**
 - Homes to purchase - **15**



- Homes to rent - 29
- Apartments to rent - 19
- Other/I don't know - 35

6. Do you own or rent your residence in Enfield?

- Own - 57
- Rent - 30

7. How long have you lived in Enfield?

- Less than 3 years - 11
- Between 3 and 6 years - 4
- Between 6 and 9 years - 3
- More than 9 years - 70

8. What is your race/ethnicity?

- White/Caucasian - 17
- Black/African American - 63
- Native American/American Indian
- Asian/Pacific Islander
- Hispanic
- Prefer not to respond - 8
- Other (Please specify) - 1

9. Is a language other than English spoken in your house?

- No - 89
- Yes (Please specify)

10. Is anyone in your household disabled, a senior citizen, or a veteran of the US military?

- Disabled - 26
- Senior Citizen (65 years or older) - 59
- Veteran - 12
- None of the above - 16

Recipient's Plan to Further Fair Housing

Grantee:	Town of Enfield
Recipient's Address:	P.O. Box 699, Enfield, NC 27823
Contact Person: Brenda Silver	Contact Phone #: (252) 445-3146
Contact Email: <u>bsilver@enfieldnc.org</u>	TDD #: 1-866-324-7474

I. Indicate if the Recipient will be affirmatively furthering fair housing for the first time or has implemented specific activities in the past.

First Time _____ Past Activities X _____

II. Identify and analyze obstacles to affirmatively furthering fair housing in recipient's community. (Use additional pages as necessary)

- Lack of knowledge of fair housing laws, regulations and guidelines by the general public.
- Local need for affordable and quality housing (to rent or own) for low and moderate income residents.
- Lack of coordination between housing-related groups and organizations in the private and public sector

III. Will the above activities apply to the total municipality or county?

Yes X No _____

If no, provide an explanation.
(Use additional pages as necessary)

IV. Briefly describe the quarterly activities that the recipient will undertake over the active period of the grant to affirmatively further fair housing in their community. A time schedule and estimated cost for implementation of these activities must be included. *Activities must be scheduled for implementation at least on a quarterly basis.* (Use attached table)



Grantee Name: Town of Enfield

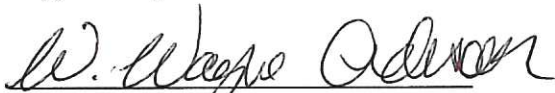
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V. Describe recipient's method of receiving and resolving housing discrimination complaints. This may be either a procedure currently being implemented or one to be implemented under this CDBG grant. Include a description of how the recipient informs the public about the complaint procedures. (Use additional pages as necessary)

- 1) Any person or persons wishing to file a complaint of housing discrimination in the *Town of Enfield, North Carolina* may do so by informing the *Town Clerk* of the facts and circumstance of the alleged discriminatory acts or practice.
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- 4) The *Town Clerk* shall **publicize** in the local newspaper, with the TDD#, who is the local agency to contact with housing discrimination complaints.

Approved By:


Wayne Anderson, Mayor

June 23, 2020

Date

