

AFFIRMATIVELY FURTHERING FAIR HOUSING (AFFH) PLAN

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|---|--|
| Grantee Name: | Town of Enfield |
| Time Period for this Plan: | |
| Grantee’s Mailing Address: | PO Box 699 Enfield, NC 27823 |
| Grantee Physical Address (if different than mailing): | 121 SE Railroad Street Enfield, NC 27823 |
| Contact Person and Title (Fair Housing Officer): | Patricia Whitaker, Finance Officer |
| Contact Email: | pwhitaker@enfieldnc.org |
| Contact Phone Number: | 252-445-3146 |
| TDD and/or TTY Number: | 711 or 800-735-2962 |

This information is available in Spanish or any other language upon request. Please contact Shante Williams, Town Clerk, at 252-445-3146 or at 121 SE Railroad St, Enfield, NC 27823 for accommodations for this request.

Esta información está disponible en español o en cualquier otro idioma bajo petición. Por favor, póngase en contacto con Shante Williams, Town Clerk, al 252-445-3146 o en 121 SE Railroad St, Enfield, NC 27823 de alojamiento para esta solicitud.

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

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

III. Will the above obstacles apply to the total municipality or county? Yes No

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

IV. Quarterly Activities.

Briefly describe the quarterly activities that the Recipient will undertake over the active period (to grant expiration date on front of grant contact/agreement) 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.

| Grantee Name: Town of Enfield | | | | |
|---|--|-------------|-----------------------|--------------------|
| Quarterly Fair Housing Actions Steps / Activities | | | | |
| Quarterly Fair Housing Action Step / Activity | Months | Year | Estimated Cost | Actual Cost |
| Adopt Fair Housing Complaint Procedure | Oct-Dec | 2024 | \$0.00 | |
| Publish Fair Housing Complaint Procedure in local newspaper | Jan-Mar | 2025 | \$175.00 | |
| Post/place Fair Housing posters, brochures and pamphlets in Town Hall Lobby | Apr-June | 2025 | \$25.00 | |
| Send Town Clerk and/or Elected Official to Fair Housing Training | July-Sept <small>(based on availability)</small> | 2025 | \$100.00/ person | |
| Place public service announcements promoting fair housing practices on the area radio station which reaches the local populace in the area. | Oct-Dec | 2025 | \$20.00 | |
| Contact local schools to distribute fair housing brochures and pamphlets. | Jan-Mar | 2026 | \$75.00 | |
| In celebration of National Fair Housing Month in April, the Town will support Regional Fair housing Events and Fair Housing Practices through the adoption of a proclamation by the Town Board | Apr-June | 2026 | \$0.00 | |
| Distribute Fair Housing brochures to citizens by placing them in utility bill mailing | July-Sept | 2026 | \$75.00 | |
| The Town will make pamphlets, posters, etc., available to citizens through the placement of said items in county governmental public offices (i.e., County Manager, Building Inspections Dept., Zoning Dept., Water Dept., and/or Office of Aging). | Oct-Dec | 2026 | \$75.00 | |
| Create an updated list of housing market professionals (realtors, banks, etc.) for use in later quarters | Jan-Mar | 2027 | \$0.00 | |
| Contact local housing professionals from updated list (i.e., realtors, banks, etc.) to distribute fair housing brochures and pamphlets. | Apr-June | 2027 | \$50.00 | |
| Contact local/County library to distribute fair housing brochures and pamphlets | July-Sept | 2027 | \$50.00 | |
| The Town will make pamphlets, posters, etc., available to citizens through the placement of said items in county governmental public offices (i.e., County Manager, Building Inspections Dept., Zoning Dept., Water Dept., and/or Office of Aging). | Oct-Dec | 2027 | \$75.00 | |

Additional Required Action Steps / Activities

1. The Town shall adopt and publicize in the local newspaper, with the TDD# and/or TTY#, the local jurisdiction's fair housing complaint procedures and Fair Housing Officer contact information for housing discrimination complaints.
2. The Town shall include the Equal Housing Opportunity logo and/or the phrase affirming Equal Opportunity in Housing on all the CDBG documents intended to be shared with the public.
3. The Town shall post/display Fair Housing and Equal Housing Opportunity posters, with local Fair Housing Officer name, title, and contact information, and other additional information in prominent locations.

V. Fair Housing Complaints

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 space/pages as necessary)*

The Town of Enfield adopts and uses the Fair Housing Complaint Procedure, most recently adopted on December 16, 2024. The Fair Housing Complaint Procedure is published in the local newspaper periodically, most recently on February 1, 2025.

Fair Housing Officer

In accordance with Title VIII, Civil Rights Act of 1968, as amended, the Fair Housing Officer identified on the front page has been designated to handle fair housing complaints and activities. The Fair Housing Officer (FHO) is responsible for the intake and processing of all housing complaints (if UGLG has its own enforcement agency) as well as implementation of the AFFH Plan activities and actions. If the Town does not have their own enforcement body, there should be a clear procedure for referring fair housing complaints to enforcement agencies that serve that municipality.

While not expected to be an "expert" in Fair Housing Laws, at a minimum, the FHO will be familiar with the complaint process and federal and state laws, which address Fair Housing. Records which show the date, time, nature of complaint and decisions made in the complaint process will be fully documented. A separate file will maintain a record of all housing discrimination complaints and follow-up actions. Referrals should be noted in the fair housing file.

The FHO is in charge of receiving fair housing complaints and tracking them in a fair housing log. They are also responsible for providing referral information in a timely manner. Thus, a specific procedure for receiving fair housing complaints must be developed. The FHO will keep a record of the progress on the number of complaints filed, actions taken, and the status of each complaint.

Housing Complaint Process

1. Any person or persons wishing to file a complaint of housing discrimination in the town may do so by informing the town clerk of the facts and circumstance of the alleged discriminatory acts or practice.

2. Upon receiving a housing discrimination complaint, the town clerk shall acknowledge the complaint within fifteen (15) working days in writing and inform the Division of Water Infrastructure 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.

A summary of actions which may constitute housing discrimination, and instructions for completing and filing housing discrimination complaints will be made available to citizens at Town Hall Building, at 121 SE Railroad St, Enfield, NC 27823


In addition, individuals can file a housing discrimination using the HUD 903 Form and HUD 903-A Form (Spanish version) at the following locations:

1. HUD at https://www.hud.gov/program_offices/fair_housing_equal_opp/online-complaint#_Information_About_Filing
2. NC Office of Administrative Hearings, Civil Rights Division at <https://www.oah.nc.gov/civil-rights-division/housing-discrimination>
3. US Department of Justice Civil Rights Division at <https://www.justice.gov/crt>

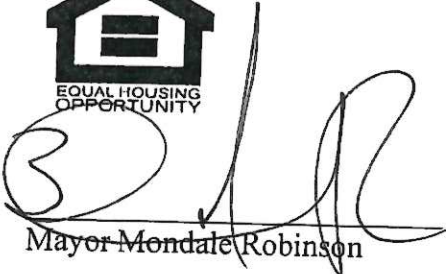
VI. AMENDMENTS

The Town shall amend and revise this Plan as required to keep current with state and federal fair housing and equal fairing opportunity statutes and regulations, and local actions and activities to further the purposes of this Plan.

PASSED BY THE TOWN BOARD, ENFIELD, NORTH CAROLINA.



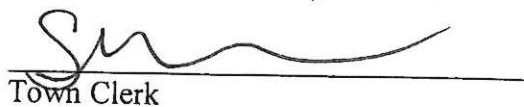
EQUAL HOUSING OPPORTUNITY



Mayor Mondale Robinson

Adopted on this 21st day of April 2025.

ATTEST:



Town Clerk

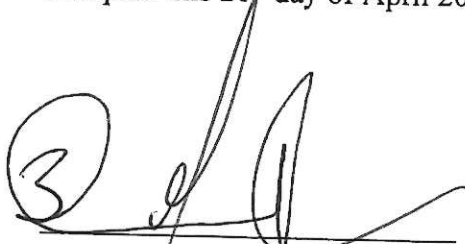
ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE (AI)

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| Grantee Name: | Town of Enfield |
| Time Period for this Plan: | 2025 - 2030 |
| Grantee's Mailing Address: | PO Box 699 Enfield, NC 27823 |
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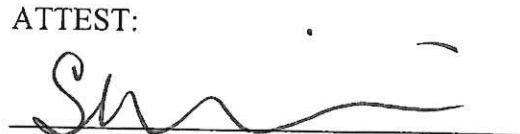
| | |
|-------------------|-------------------------------------|
| Check one: | |
| Initial AI | <input type="checkbox"/> |
| Amended AI | <input type="checkbox"/> |
| Renewal AI | <input checked="" type="checkbox"/> |



Adopted this 21st day of April 2025.



 Mayor Mondale Robinson

ATTEST:


 Town Clerk

GRANT RECIPIENT

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE (AI)

I. INTRODUCTION

The Department of Housing and Urban Development (HUD) is committed to eliminating racial and ethnic segregation and other discriminatory practices in housing and will use all its programmatic and enforcement tools to achieve this goal. The fundamental goal of HUD's fair housing policy is to make housing choice a reality through fair housing planning. Fair housing planning involves three main steps:

1. Conducting an analysis of impediments to fair housing choice within the jurisdiction;
2. Taking meaningful actions to overcome the effects of any impediments identified through the analysis; and
3. Maintaining records reflecting the analysis and actions taken.

This report is the Analysis of Impediments to Fair Housing Choice (AI). This analysis has been completed for the Town of Enfield to begin Oct-Dec 2024. This AI and a AFFH Plan will be incorporated into the Town's CDBG Policies and Procedures.

The AI is a review of impediments to fair housing choice in the public and private sector. It involves a comprehensive review of the jurisdiction's laws, regulations, policies, procedures, and practices; and an assessment of how those laws, etc. affect the location, availability, and accessibility of housing. In addition, it includes an assessment of conditions, both public and private, affecting fair housing choice for members of the protected groups.

Specifically, impediments to fair housing choice are any actions, omissions, or decisions, which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.

The AI includes an analysis of demographic data and a housing needs assessment. It then includes an analysis to determine the nature and extent of discrimination against the protected groups within the jurisdiction. The format used to conduct this analysis is a fair housing planning model developed for use by local government CDBG grantees by the North Carolina Department of Environmental Quality.

II. SOCIO-ECONOMIC BACKGROUND DATA AND ANALYSIS

A. Community Profile (*local government information, etc.*)

| Population by Race | | |
|----------------------------------|----------|---------|
| Race Group | Estimate | Percent |
| Total population | 1,967 | 100% |
| White | 203 | 10.32% |
| Black or African American | 1,739 | 88.41% |
| American Indian or Alaska Native | 10 | 0.51% |
| Two or More Races | 15 | 0.76% |

Source: U.S. Census Bureau, 2023 ACS 5-year estimates

B. Demographic Profile (local government, compare with county and state data)

| Population by Age Group Comparison with County & State | | | | | | |
|--|--------------|---------|----------------|---------|----------------|------------|
| Age Group | Enfield town | | Halifax County | | North Carolina | |
| | Estimate | Percent | Estimate | Percent | Estimate | Percent |
| Total population | 1,967 | 1,967 | 48,219 | 48,219 | 10,584,340 | 10,584,340 |
| 19 and under | 522 | 26.54% | 11,237 | 23.30% | 2,617,254 | 24.73% |
| 20 to 24 years | 143 | 7.27% | 2,487 | 5.16% | 705,276 | 6.66% |
| 25 to 44 years | 465 | 23.64% | 11,186 | 23.20% | 2,761,082 | 26.09% |
| 45 to 64 years | 398 | 20.23% | 12,883 | 26.72% | 2,713,701 | 25.64% |
| 65 to 84 years | 323 | 16.42% | 9,197 | 19.07% | 1,603,071 | 15.15% |
| 85 years and over | 116 | 5.90% | 1,229 | 2.55% | 183,956 | 1.74% |

Source: U.S. Census Bureau, 2023 ACS 5-year estimates

C. Education and Economic Profile (local government, compare with county and state data)

| Education Attainment Comparison with County & State | | | | | | |
|---|------------------------------|---------|--------------------------------|---------|----------------|---------|
| | Enfield town, North Carolina | | Halifax County, North Carolina | | North Carolina | |
| | Estimate | Percent | Estimate | Percent | Estimate | Percent |
| Population 25 and older | 1,302 | 100% | 34,495 | 100% | 7,261,810 | 100% |
| Less than 9th grade | 126 | 9.68% | 2,096 | 6.08% | 288,456 | 3.97% |
| 9 th to 12 th grade, no diploma | 228 | 17.51% | 4,490 | 13.02% | 456,125 | 6.28% |
| High School Graduate (includes equivalency) | 580 | 44.55% | 12,540 | 36.35% | 1,812,528 | 24.96% |
| Some College, no degree | 192 | 14.75% | 7,012 | 20.33% | 1,452,354 | 20.00% |
| Associate's degree | 145 | 11.14% | 3,025 | 8.77% | 730,994 | 10.07% |
| Bachelor's degree | 22 | 1.69% | 3,533 | 10.24% | 1,582,709 | 21.79% |
| Graduate or professional degree | 9 | 69.00% | 1,799 | 5.22% | 938,644 | 12.93% |
| High school graduate or higher | 948 | 72.81% | 27,909 | 80.91% | 6,517,229 | 89.75% |
| Bachelor's degree or higher | 31 | 2.38% | 5,332 | 15.46% | 2,521,353 | 34.72% |

Source: U.S. Census Bureau, 2023 ACS 5-year estimates

III. ANALYSIS TO DETERMINE DISPROPORTIONATE HOUSING NEED

A. Housing Profile (local government, compare with county and state data)

| Household Composition Comparison with County & State | | | |
|--|--------------|----------------|----------------|
| | Enfield town | Halifax County | North Carolina |
| Total Households | 809 | 20,269 | 4,186,924 |
| Average household size | 2.38 | 2.32 | 2.46 |
| Average family size | 3.51 | 2.95 | 3.05 |
| Single occupant households | 47.20% | 32.50% | 29.20% |
| % of households with 1 or more people under 18 years | 26.30% | 26.20% | 29.40% |

Source: U.S. Census Bureau, 2023 ACS 5-year estimates (All numbers are estimates)

| Occupied Household Size Comparison with County & State | | | |
|--|------------------------------|--------------------------------|----------------|
| | Enfield town, North Carolina | Halifax County, North Carolina | North Carolina |
| Total Households | 809 | 20,269 | 4,186,924 |
| 1-person household | 382 | 6,593 | 1,221,017 |
| 2-person household | 153 | 7,320 | 1,495,662 |
| 3-person household | 97 | 3,160 | 649,183 |
| 4-or-more person household | 177 | 3,196 | 821,062 |

Source: U.S. Census Bureau, 2023 ACS 5-year estimates

| Monthly Housing Costs in Enfield NC (2023) | | | | | | |
|--|------------------------|---------|------------------------------|---------|-------------------------------|---------|
| | Occupied Housing Units | | Owner-Occupied Housing Units | | Renter-Occupied Housing Units | |
| | Estimate | Percent | Estimate | Percent | Estimate | Percent |
| Less than \$300 | 80 | 9.9% | 5 | 1.7% | 75 | 14.8% |
| \$300 to \$499 | 179 | 22.1% | 98 | 32.5% | 81 | 16.0% |
| \$500 to \$799 | 160 | 19.8% | 47 | 15.6% | 113 | 22.3% |
| \$800 to \$999 | 55 | 6.8% | 24 | 7.9% | 31 | 6.1% |
| \$1,000 to \$1,499 | 171 | 21.1% | 92 | 30.5% | 79 | 15.6% |
| \$1,500 to \$1,999 | 62 | 7.7% | 36 | 11.9% | 26 | 5.1% |
| \$2,000 to \$2,499 | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| \$2,500 to \$2,999 | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| \$3,000 or more | 0 | 0.0% | 0 | 0.0% | 0 | 0.0% |
| No cash rent | 102 | 12.6% | (x) | (x) | 102 | 20.1% |
| Median (dollars) | 621 | 621 | 807 | 807 | 580 | 580 |

Source: U.S. Census Bureau, 2023 ACS 5-year estimates

IV. ANALYSIS TO DETERMINE THE NATURE AND EXTENT OF DISCRIMINATION

A. Analysis of the Level of Segregation and Spatial Isolation *(provide answers to the following and how/where you received the information)*

All answers are based on knowledge of Town Commissioners and long-term staff.

1. Are there areas of minority concentration within your jurisdiction? Yes
2. What is the county tier your community is located in? Tier 1; NC Commerce report (attached)

B. Historical Incidences that Contribute to Current Housing Patterns *(provide answers to the following and how/where you received the information)*

All answers are based on knowledge of Town Commissioners and long-term staff.

1. History of public policy decision on segregation within the community. None
2. Number of farms that utilizes migrant workers and its effects on housing patterns. None
3. Industry contributions to current housing patterns. None

C. Discrimination in the Rental Market *(provide answers to the following and how/where you received the information)*

All answers are based on knowledge of Town Commissioners and long-term staff.

1. Are there any zoning requirements that have the effect of limiting the availability of rental units within the jurisdiction? No
2. Where are the rental units located? Are they located in areas of minority concentration? None
3. Where are the public housing units located? Roanoke Chowan Public Housing (Freedom Street); Carriage House (Carriage House Lane); and Deerfield Apartments (Hwy 481)
4. Determine what barriers exist for protected class members in the rental market. None known
5. Are vouchers and Section 8 certificate holders able to find housing throughout the community? If not, identify the barriers that face them. No due to limited availability
6. Is steering an issue for protected class members? No
7. Is housing available for families with children and persons with disabilities? Yes

D. Discrimination in the Sales Market *(provide answers to the following and how/where you received the information)*

All answers are based on knowledge of Town Commissioners and long-term staff.

1. Does the local association of realtors have an MLS service? No local association known to exist by local staff or officials
2. Is the local association of realtors a VAMA signatory? N/A
3. Is there any evidence of protected class members steering or blockbusting within the local market? No
4. What are the relative housing values for minority and non-minority communities of similar economic composition? N/A
5. Identify any barriers to home ownership opportunities within your jurisdiction. None known to exist

E. Discrimination in Financing *(provide answers to the following and how/where you received the information)*

All answers are based on knowledge of Town Commissioners and long-term staff except where otherwise noted.

1. Are local lenders signatories of HUD's best practices program? Not known
2. Examine the Home Mortgage Disclosure Act information in your area. Is there evidence of higher denial rates for protected class members? No; Home Mortgage Disclosure Act information (ffiec.cfpb.gov)
3. Is there evidence of illegal redlining? No
4. Are banking services available on an equal opportunity basis? Yes
5. Examine the community needs assessment and community reinvestment activities of local banks to determine the adequacy of these activities as compared to community needs as determined through the jurisdiction's planning process. Not known
6. Do local financial institutions participate in housing projects or in the funding of housing related services sponsored by the jurisdiction? No

F. Discrimination in the Building and Construction Industry (*provide answers to the following and how/where you received the information*)

All answers are based on knowledge of Town Commissioners and long-term staff.

1. Do local building codes include the requirements of the Federal Fair Housing Act? Yes, handled by Halifax County
2. If not, how are local builders and architects made aware of these requirements? N/A
3. How many single-family and multi-family dwellings funded by local (including non-for-profits), state, or federal funds have been built in the past 20 years? 1 apartment complex
4. Are they in compliance with FFHA requirements? ADA requirements? Section 504? Yes on all counts
5. Is the local homebuilders' association a VAMA signatory? N/A, no known homebuilders' association exist
6. Is there an identified community need for persons with disabilities? Yes
7. Is there an identified community need for the construction of more affordable housing? Yes

G. Environmental Justice Discrimination (*provide answers to the following and how/where you received the information*)

All answers are based on knowledge of Town Commissioners and long-term staff.

1. Identify the location of hazardous materials within the community. Are they located disproportionately in areas of minority and low-income concentration? Helena Agri-Enterprises (S. Dennis St), Tri-County Peanut Warehouse (S. Dennis St), and Eastern Petroleum Corporation (Ringwood Rd); Yes
2. Identify any superfund sites within your jurisdiction. Are they located disproportionately in areas of minority or low-income concentration? None known to exist per www.epa.gov or town staff and Commissioners
3. Identify any areas without public water and sewer services. If there are areas, why are they lacking public services? Are they located disproportionately in areas of minority or low-income concentration? Identify local efforts to provide public services. None
4. Identify any local, state or federal efforts to remove environmental hazards. None
5. What barriers exist to remove environmental hazards from the community? None

V. **FAIR HOUSING ENFORCEMENT** (*provide answers to the following and how/where you received the information*)

All answers are based on knowledge of Town Commissioners and long-term staff.

1. Does the community have a fair housing ordinance? Yes
2. What mechanism exists for citizens to file a complaint alleging illegal discrimination in programs or services funded by your jurisdiction? The Fair Housing Complaint Procedure adopted by the Town
3. Do you have Affirmative Marketing Plan? Yes, this Fair Housing Analysis and Activity Plan
4. The number of discrimination complaints files against your jurisdiction within the past two years and the results on any investigations. None
5. The number of discrimination complaints filed with the NC Human Relations Commission or HUD originating in your jurisdiction and the results of any investigations. None
6. Number of findings related to Fair Housing or Equal Opportunity issued against your jurisdiction and the corrective action taken. None

VI. **FAIR HOUSING EDUCATION AND OUTREACH EFFORTS** (*provide answers to the following and how/where you received the information*)

All answers are based on knowledge of Town Commissioners and long-term staff.

1. Identify all resources available for promotion of fair housing and equal opportunity. Posters, newspaper ads, brochures, town websites, etc., communication with local housing related businesses, county offices and/or public schools.
2. How are citizens made aware of these activities? Posters, newspaper ads, brochures, town websites, communication with local housing related businesses, county offices and/or public schools, etc. Pamphlets and/or brochures are periodically mailed to citizens with their utility bills.
3. List all such activities during the past two years. What were the results of these activities? The above-mentioned activities have been done at regular intervals throughout the last 7⁺ years.

VII. **EXAMINATION OF PUBLIC POLICY AND PROGRAMS** (*provide answers to the following and how/where you received the information*)

All answers are based on knowledge of Town Commissioners and long-term staff.

1. Do current site selection policies have a disproportionate impact based upon a protected basis? If so, is there a nondiscriminatory reason for this policy and is there an alternative that would have a less discriminatory impact? No
2. Are municipal and/or county services equitably distributed throughout the community? Yes
3. Are there any zoning requirements that have the effect of limiting housing opportunities to protected groups? No
4. Are there any community development or public housing authority activities or programs that have the effect of perpetuating segregation? No
5. Is the Board or Commission representative of the community? Yes

VIII. **BARRIERS TO EQUAL HOUSING OPPORTUNITIES**

Identify and discuss the barriers to equal housing opportunities in your community and how they will be addressed through actions/activities. No known barriers other than price.