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Center for Housing  
& Community Studies

# Analysis of Impediments To Fair Housing Choice



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# Analysis of Impediments & Assessment of Fair Housing Choice

**Report Submitted to the City of Goldsboro**

May 1, 2021

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# INTRODUCTION

The terms “home” and “neighborhood” indicate the geographic locations where many Americans live out their daily existence. Home is the essential foundation for everything else in a person’s life, one of the three most basic human needs. To be without a safe and dependable home makes every aspect of daily living more complicated. The availability of fair, affordable, and safe housing plays a critical role in the economy and in communities by creating jobs, attracting new industry, reducing the incidence of foreclosures, increasing local tax revenues, and allowing working families to spend more on health, education, food, and other needs. The focus of this report will be on important and interrelated facets of the availability of safe, fair, and affordable housing in the City of Goldsboro.

This report was developed by the Center for Housing and Community Studies (CHCS) in response to a request for proposals for Analysis of Impediments to Fair Housing (AI) Consulting Services – RFP2019-005, from the City of Goldsboro. The initial proposal submitted January 21, 2020 was revised per

an amended RFP with a revised scope and budget submitted April 8, 2020 and fully executed contract dated July 9, 2020.

The project involved compiling, analyzing, and mapping local jurisdictional, state, and national data sources on residential housing disparities for the seven federally protected categories: Race, Color, Religion, Sex, Handicap, Familial Status, and National Origin. Local mortgage markets, house sales, public housing, voucher programs, market rental patterns, fair housing complaints, and other data points are referenced. Collection of primary data from stakeholders and key informants through public and stakeholder meetings and interviews aided in providing a comprehensive understanding of fair housing issues in the region.

The preparation of this Analysis of Impediments to Fair Housing Choice (AI) serves as a component of the Goldsboro’s efforts to satisfy the requirements of the Housing and Community Development Act of 1974. The City of Goldsboro is an entitlement city according to the U.S. Department of Housing and Urban Development (HUD) criteria. Accordingly,



the City receives annual allocations of funds for housing and community development projects under the Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) Programs. The City receives over half a million dollars in federal funds directly from the Department of Housing and Urban Development (HUD) each year.

### **Responsible Agencies**

The City of Goldsboro's Community Relations Department is the responsible for the advancement of human/civil rights issues such as fair housing, equal employment, unfair treatment, and equal access to public services/accommodations. It is the officially designated department responsible to receive, investigate, and mediate complaints of discrimination, such as fair housing. It is also the department responsible for ensuring that the City's fair housing requirements are met.

The City of Goldsboro implements the provisions of the Fair Housing Act and the State Fair Housing Act (North Carolina) as it relates to housing discrimination but also has its own specific fair housing ordinance: Fair Housing Resolution No. 1977-169. Title II, Chapter 32 of the City's Charter identifies

the Commission on Community Relations and Development as the advisory body to the City Council that "studies problems of discrimination as they are brought to the Commission's attention; and to encourage fair treatment and mutual understanding among all social and ethnic groups within the City."

Communities receiving HOME Investment Partnership are required to: 1) Examine and attempt to alleviate housing discrimination within their jurisdiction; 2) promote fair housing choice for all persons; provide opportunities for all persons to reside in any given housing development, regardless of race, color, religion, sex, disability, familial status or national origin; 3) promote housing that is accessible to and usable by persons with disabilities; and 4) comply with the non-discrimination requirements of the Fair Housing Act. The AI includes Assessment of Fair Housing for the jurisdiction and meets current requirements by highlighting impediments and proposing actions to remediate impediments.

### **Data Sources & Methods**

This project was conducted over an eight-month period (June 2020 to Feb 2021). The process of AI development included public

meetings and interviews with local fair housing stakeholders. The City of Goldsboro assisted CHCS Staff in providing local data and identification of local stakeholders. The project began with a meta-analysis of existing AI and planning reports. The synthesis of data from the reports provided a general assessment of current public and private fair housing programs and activities. Geographic information systems (GIS) and statistical analyses were performed with layers showing socio-demographic composition of the localities. Maps showed an overview of patterns of occupancy including census tract, census block, or count subdivision maps of proportion of population by each protected status; computation of GINI coefficients for each area; analysis of income, employment, and poverty data; and a housing stock profile for public and subsidized housing. Telephone and zoom interviews with key informant stakeholders (City and County staff, City Council, County Commissioners, developers, landlords, planners, mortgage officers, residents, housing advocate, etc.) were conducted, recorded, and transcribed.

HUD does not require jurisdictions to conduct primary data collection in order to

complete an Analysis of Impediments to Fair Housing Choice. Existing data from the AFFH Tool and reports may be used to uncover potential disparities. In this report, we have used data from the AFFH Tool (version AFFHT0006 released July 10, 2020).

We have supplemented this with additional data from a variety of secondary sources including the most recent American Community Survey (one-year and five-year estimates). We have also drawn upon 2018 Home Mortgage Disclosure Act (HMDA) data from the Federal Financial Institutions Examination Council (FFIEC) for a thorough analysis of fair lending practices. Finally, we have collected and analyzed primary data for this report including interviews and focus groups with area experts and residents.

These interviews explored issues and experiences related to barriers to fair housing access and choice as well as disparate impacts and disparate treatment within the housing marketplace. Four public and stakeholder meetings were also conducted to establish the key concerns of the community. These sessions were facilitated by Dr. Stephen Sills and Dr. Kenneth Gruber and were digitally recorded for the purposes of providing a reliable

record of the sessions. The recordings were analyzed for key findings. Survey data collected and provided by the City of Goldsboro was likewise reviewed. Finally, logistic regression analysis was performed on Housing Mortgage Disclosure Act (HMDA) data to examine fair lending practices.

## **Findings from Previous Analysis of Impediments**

Before conducting the current analysis, the research team reviewed the 2015-2019 Analysis of Impediments to Fair Housing Choice for the City of Goldsboro. This report, produced in 2015, identified ten significant impediments or barriers across public and private sector housing and in the administration of municipal resources for addressing residential housing needs.

### ***1. Zoning & Land Use***

According to the 2015-2019 study, zoning codes, land use controls, and administrative practices may impede fair housing choice and fail to affirmatively further fair housing. Requirements for commercial/business districts do not encourage residential uses and limit affordable housing close to public

transportation. Inadequate consideration of demographic data and housing needs of FHA protected classes such as persons with disabilities in the City's planning processes and documents such as the Comprehensive Plan. Public notification and community approval of affordable housing development for projects that are not allowed by right may initiate and support NIMBY and other opposition which limit fair housing choice.

### ***2. Neighborhood Revitalization***

Historic and consistent pattern of concentration of racial/ethnic and low-income populations in the City. Significant vacant and dilapidated structures in some neighborhoods affect housing affordability with a disparate impact on members of the protected classes. Concentration of Housing Choice Vouchers (Sec 8 vouchers available from the Housing Authority of the City of Goldsboro)<sup>1</sup> in high poverty low-opportunity areas and refusal to accept vouchers in better areas can restrict the fair housing choice for members of the protected classes.

### ***3. Fair Housing Complaint System***

According to the 2015-2019 study, The City has an inadequate fair housing complaint

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<sup>1</sup> <https://www.hacg.org/hcv-program>

and referral process which may hinder fair housing enforcement.

#### ***4. Employment-Housing-Transportation***

##### ***Linkage***

According to the 2015-2019 study, unreliable public transportation options, especially outside of the corporate limits fair housing choice with a disparate impact on FHA protected classes.

#### ***5. Private Sector Lending***

Protected class members are disproportionately impacted by lending practices based on disparities in loan denial rates, high costs and predatory practices. Protected class members are disproportionately impacted by credit history and low incomes that limit their loan qualification amounts.

#### ***6. Private Sector Real Estate***

Housing discrimination by landlords of single-family dwellings and multi-family developments restrict fair housing choice among members of the FHA protected classes. Increase in the potential for persons with mental disabilities to be restricted in housing choices due to cuts in case management and support services.

#### ***7. Special Needs Housing & Accessibility***

Public and private actions (inadequate accessible housing) and private attitudes (NIMBYism) limit housing choices for seniors and persons with disabilities.

#### ***8. Housing Affordability***

Lack of or inadequate affordable housing for Goldsboro residents due to high costs, availability of land, and diverse sites especially in low poverty “high-opportunity” areas limits fair housing choice. A highly competitive real estate market and investors with cash makes it challenging to create and/or preserve affordable housing. The age of housing stock coupled with the existence of lead paint hazards and limited financial resources for landlords to abate lead paint limits housing choices for families with young children.

#### ***9. Economic Factors***

Lack of financial resources for both individuals and housing providers limit fair housing choices. Non-compliance with Section 3 of the Housing and Urban Development Act of 1968 prevents members of protected classes from gaining economic opportunities necessary to allow them to exercise fair housing choice.

***10. Informational Programs, Education, Outreach, & Advocacy***

Inadequate fair housing education and awareness to all members of the community resulting in misconceptions, violations of fair housing laws and failure to report such violations. Lack of knowledge results in underutilization of available complaint systems and resources, meaning possible fair housing violations go unaddressed and

without sanction for those who discriminate. Language barriers especially among immigrant populations limits access to all available housing and awareness of fair housing rights. Lack of fair housing training for City staff, officials and zoning and planning boards limits their awareness of the effect of actions, decisions, or omissions on fair housing choice.



# FAIR HOUSING POLICY REVIEW

## **Civil Rights Act of 1866**

The Civil Rights Act of 1866 prohibits all racial discrimination in the sale or rental of property.

### ***Section 1982***

Section 1982 of Title 42 of the U.S. Code—part of the Civil Rights Act of 1866—protects citizens of the United States from racial discrimination in, among other things, private and public rental housing. Although Hispanics are not technically a race (the group consists of many races), the statute prohibits discrimination against Hispanic citizens in rental housing because Section 1982 defines racial discrimination as Congress considered it in 1866. Thus Section 1982 protects citizens against discrimination based not only on racial characteristics but also on ethnic characteristics and ancestry that were considered racial in the nineteenth century. Hispanics were considered a race in 1866.

### ***Section 1981***

Section 1981 of Title 42 of the U.S. Code—another part of the Civil Rights Act of 1866—prohibits discrimination based on race in the making of contracts. Section 1981 grants to

all people the same rights as “white citizens” to make and enforce contracts. The statute is broad enough to cover housing discrimination cases alleging refusal to rent or to grant privileges that normally accompany rental contracts. Section 1981 applies to private as well as public discrimination. Like Section 1982, Section 1981 protects all people who were considered to be nonwhite in 1866. Section 1981 is broader than Section 1982, however, because it protects all people (including aliens), not just citizens.

## **Equal Protection Clause**

The Equal Protection Clause of the U.S. Constitution requires courts to scrutinize strictly any governmental distinctions based on “suspect classifications,” which include race, national origin, and alienage (whether or not a person is a citizen). To recover monetary damages for a violation of the U.S. Constitution, a plaintiff must sue under the Civil Rights Act of 1871, which is codified as Section 1983 of Title 42 of the U.S. Code. The purpose of Section 1983 is to allow people to



## **EQUAL HOUSING OPPORTUNITY**

seek compensation from local governments for violations of federally protected rights. A plaintiff may sue a private defendant under Section 1983 only when some nexus, or connection, exists between the private defendant's action and the state. In other words, there must be some governmental, or state, action. The mere fact that a private landlord has received federal or state funding or is subject to heavy governmental regulation may not by itself provide a sufficient nexus for the court to find state action under Section 1983. The lower courts are in conflict about whether there is sufficient governmental action when a private landlord participates in the federal Section 8 program under Section 1437 of Title 42 of the U.S. Code, which provides vouchers or certificates for low-income people, to subsidize the cost of private rents.

### **North Carolina Fair Housing Act**

The state Fair Housing Act (Chapter 41A of the North Carolina General Statutes) makes illegal the same actions as the federal Fair Housing Act. The protected classes are race, color, sex, national origin, handicapping condition, and familial status. In 2009 the North Carolina General Assembly adopted amendments to the North Carolina Fair Housing Act that expanded coverage to include discrimination on the basis of affordable housing by adopting the following text: "It is an unlawful discriminatory practice to discriminate in land-use decisions or in the permitting of development based on race, religion, sex, national origin, handicapping condition, familial status, or, except as otherwise provided by law, the fact that a development or proposed development contains affordable housing units for families or individuals with incomes below 80% of area median income." The state Fair Housing Act designates the North Carolina Human Relations Commission, which was created in 1963 to promote civil rights and equal opportunities for North Carolina residents, as the enforcing agency.

## **Equal Credit Opportunity Act**

The Equal Credit Opportunity Act makes discrimination unlawful with respect to any aspect of a credit application on the basis of race, color, religion, national origin, sex, marital status, age or because all or part of the applicant's income derives from any public assistance program.

## **Americans with Disabilities Act**

Title III of the Americans with Disabilities Act prohibits discrimination against persons with disabilities in places of public accommodations and commercial facilities.

## **Federal Fair Housing Act**

The Fair Housing provisions of the Civil Rights Act of 1968 put an end to the legality of discriminatory practices, but because the law was the result of so much contention and compromise in Congress, it lacked adequate enforcement provisions and had the effect of simply making ongoing discrimination harder to detect. The Fair Housing Amendments of 1988 corrected the 1968 legislation's major flaws by strengthening enforcement mechanisms and broadening the scope of the original law. The Federal Fair Housing Act was passed just days after the assassination of Martin Luther

King Jr. in 1968. Today this act, and its amendments, protects renters and home buyers from unequal treatment on the basis of race, color, religion, sex, national origin, familial status, and handicap. With very few exceptions, all units are covered under Federal laws. There are some exemptions for owner-occupied units where the owner is renting out one unit only. There are also some exemptions for boarding house-style units where the kitchen and bathrooms are shared. The law applies to all transactions and dealings with housing providers, mortgage brokers, homeowner's insurance agents, and anyone else engaged in the sale or rental of housing. Discrimination is illegal in all housing-related activities, whether it occurs during the searching stages, when the tenant is currently in the unit, or when the tenant is leaving or has left the unit. Under Federal Law, there are 6 protected categories. Examples of Fair Housing violations include:

- Race / Color – An African American client arranged a rental by phone from another city. When she arrived at the unit on the move-in day the landlord took one look at her and said there was no way she could rent the place.

- Religion – While the number of cases filed since 1968 alleging religious discrimination is small in comparison to some of the other prohibited bases, an example may include: A landlord receives a complaint from a tenant who claims a Muslim tenant is "having a group of about five or six other Muslim men over to his apartment every Monday night." The tenant claims, "the men appear unfriendly" and thinks they may be "up to something." However, the tenant's visitors do not disturb the other residents in their peaceful enjoyment of the premises. A landlord could be accused of religious discrimination if s/he asks the tenant to refrain from having Muslim guests when there is no evidence of any violation of established property management rules.
- National origin – Many studies around the nation, including at least one recent study in the Piedmont Triad, revealed that Hispanic people are discriminated against, often on the basis of their accent. For example, some landlords refused to make repairs for Hispanic tenants, while making repairs for non-Hispanic tenants.
- Sex – Many advertisements on Craigslist will state "Females preferred." This is illegal.
- Disability – A woman with a bad knee was denied her request for an

accessible parking space so that she didn't have to climb a set of 16 stairs every day. They refused the request continually for 3 years and the client ended up having to get a knee replacement. The case went to a jury trial and was settled for \$1 million. Under the Fair Housing Act an aggrieved person may, not later than one year after an alleged discriminatory housing practice has occurred, file a complaint directly with the U.S. Department of Housing and Urban Development (HUD), or a state or local agency that enforces laws that are "substantially equivalent" to the Fair Housing Act. Upon the filing of such a complaint, HUD has the responsibility to serve notice of the complaint and conduct an investigation into the alleged discriminatory housing practice.

- Familial status – It is illegal for a landlord to steer a family with children away from second floor units out of fear for their children falling off the balcony. It is also illegal to set overly restrictive occupancy limits.
- In addition, the North Carolina Fair Housing prohibits discrimination based on "the fact that a development or proposed development contains affordable housing units for families or individuals with incomes below eighty percent (80%) of area median income. It is not a violation of this

Chapter if land-use decisions or permitting of development is based on considerations of limiting high concentrations of affordable housing.

### ***Prohibited Activities***

In the Sale and Rental of Housing: No one may take any of the following actions based on race, color, national origin, religion, sex, familial status or handicap:

- Refuse to rent or sell housing
- Refuse to negotiate for housing
- Make housing unavailable
- Deny a dwelling
- Set different terms, conditions or privileges for sale or rental of a dwelling
- Provide different housing services or facilities
- Falsely deny that housing is available for inspection, sale, or rental
- For profit, persuade owners to sell or rent (blockbusting) or
- Deny anyone access to or membership in a facility or service (such as a multiple listing service) related to the sale or rental of housing.

***In Mortgage Lending:*** No one may take any of the following actions based on race, color, national origin, religion, sex, familial status or handicap (disability):

- Refuse to make a mortgage loan

- Refuse to provide information regarding loans
- Impose different terms or conditions on a loan, such as different interest rates, points, or fees
- Discriminate in appraising property
- Refuse to purchase a loan or
- Set different terms or conditions for purchasing a loan.

***In Addition:*** It is illegal for anyone to:

- Threaten, coerce, intimidate or interfere with anyone exercising a fair housing right or assisting others who exercise that right
- Advertise or make any statement that indicates a limitation or preference based on race, color, national origin, religion, sex, familial status, or handicap. This prohibition against discriminatory advertising applies to single-family and owner-occupied housing that is otherwise exempt from the Fair Housing Act.

### ***Additional Disability Protections***

If you or someone associated with you:

- Have a physical or mental disability (including hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex and mental retardation) that substantially limits one or more major life activities
- Have a record of such a disability or
- Are regarded as having such a disability



Your landlord **may not**:

- Refuse to let you make reasonable modifications to your dwelling or common use areas, at your expense, if necessary, for the disabled person to use the housing. (Where reasonable, the landlord may permit changes only if you agree to restore the property to its original condition when you move.)
- Refuse to make reasonable accommodations in rules, policies, practices or services if necessary, for the disabled person to use the housing.

### **Affirmatively Furthering Fair Housing**

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act or FHA) and its 1988 amendments were designed to protect renters and home buyers from unequal treatment on the basis of race, color, religion, sex, national origin, familial status, and handicap. The FHA bars landlords from refusing to rent or sell housing, making housing unavailable, denying housing, setting different terms or conditions, or providing different housing services or facilities on the basis of one of the protected categories. Despite much improvement over the years, paired testing and other methods

have revealed continuing patterns of housing discrimination against protected groups. When these groups find their residential mobility blocked, it creates a barrier to socioeconomic and occupational mobility.

The Department of Housing and Urban Development (HUD) requires that recipients of HUD funds conduct an Analysis of Impediments (AI) to Fair Housing Choice every five years. The regulatory basis for the AI is found in the Code of Federal Regulations (CFR). Each jurisdiction is required to submit a certification that it will affirmatively further fair housing, which means that it will conduct an analysis to identify impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions in this regard. 24 CFR 91.225(a)1 (HUD Consolidated Plan Certifications). Thus, an AI is a third-party evaluation of a city's/jurisdiction's housing market and the ability of all groups to access safe and decent housing in the marketplace. It includes an enumeration of barriers and policy recommendations for removing them.

The National Affordable Housing Act of 1990, which governs the HOME program, as amended, {Section 105 (b)(15)} requires jurisdictions to include a certification with the housing strategy certifying that the jurisdiction will affirmatively further fair housing. Specifically, Consolidated Plan Regulations at 24 CFR 91.225 (a) state that the AFFH certification must be included in the annual submission to HUD.

The regulations governing the CDBG program also address fair housing requirements. Under 24 CFR 570.506(g) – Records to be maintained - the grantee must maintain fair housing and equal opportunity records containing: a) Documentation of the analysis of impediments; and b) The actions the recipient has carried out with its housing and community development and other resources to remedy or ameliorate any impediments to fair housing choice in the recipient’s community. Also per 24 CFR 570.601 (a) (2) the Fair Housing Act (42 USC 3601-3620 applies. It states that “in accordance with the Fair Housing Act, the Secretary requires that grantees administer all programs and activities related to housing and community development in a manner to affirmatively further the policies of the Fair

Housing Act. Section 104(b)(2) of the Act, for each community receiving a grant under subpart D goes on to state the grantee shall be required “to assume the responsibility of fair housing planning” the AFFH process as detailed above.

Finally, the Consolidated Plan certifications included under the “Specific CDBG Certifications” states that the Entitlement Community certifies under “Compliance with Anti- Discrimination Laws - that the grant will be conducted and administered in conformity with title VI of the Civil Rights Acts of 1964 (42 USC 2000d) , the Fair Housing Act (42UAC 3601-3619), and implementing regulations.

On July 16, 2015, HUD published the Affirmatively Furthering Fair Housing (AFFH) final rule. This rule establishes a new process that HUD program participants must use to plan for fair housing outcomes that will assist them in meeting their statutory obligation to affirmatively further fair housing.

Section 808 of the Fair Housing Act says that the authority and responsibility for administering the Act resides with the Secretary of Housing and Urban Development. Among the functions of the

Secretary are to prepare an annual report to Congress; and administer the programs and activities relating to housing and urban development in a manner affirmatively to further the policies of this subchapter.

On January 5, 2018, HUD suspended implementation of the agency's 2015 Affirmatively Furthering Fair Housing regulation by delaying submission of Assessments of Fair Housing until after October 31, 2020. The submission of these fair housing plans is tied to the 5-year cycle under which program participants must submit Consolidated Plans, most of which must be submitted before October 31, 2020. HUD's action means that most program participants will not be required to submit a fair housing plan for HUD review until 2024 or 2025.

### **Fair Housing Services, & Activities**

In the United States, while many municipalities and other governmental entities participate in HUD funded programming, some agencies receive special funding from HUD as Fair Housing Assistance Programs (FHAP) recipients. FHAP recipients require an ordinance or law that empowers a state or local governmental agency to enforce the state or local fair housing laws.

Once HUD determines that the local entity can operate on a "substantially equivalent" level to federal agency enforcement activities, HUD contracts with that agency to process fair housing complaints and reimburses the jurisdiction on a per case basis. FHAP grants are given only to public entities and are given on a noncompetitive, annual basis to substantially equivalent state and local fair housing enforcement agencies. To create a substantially equivalent agency, a state or local jurisdiction must first enact a fair housing law that is substantially equivalent to federal laws. In addition, the local jurisdiction must have both the administrative capability and fiscal ability to carry out the law. With these elements in place, the jurisdiction may apply to HUD for substantially equivalent status. The jurisdiction's law would then be examined, and officials of the federal government make a determination as to whether it was substantially equivalent to federal fair housing law. Once substantially equivalent status has been granted, complaints of housing discrimination are dually filed with either the state or local agency and with HUD. The state or local agency investigates most complaints. However, when federally

subsidized housing is involved, HUD will typically investigate the complaint. Still, the state or local agencies are reimbursed for complaint intake and investigation and are awarded funds for fair housing training and education.

There are six entities in North Carolina that have been designated by HUD as FHAP recipients. One of these is a state-wide entity and the others are agencies of local governments.

## **Complaint Process**

According to HUD, any person who feels their housing rights have been violated may submit a complaint to HUD via phone, mail or the Internet. The online complaint form is available at:<sup>2</sup>

*[portalapps.hud.gov/FHEO903/Form903/Form903Start.action](https://portalapps.hud.gov/FHEO903/Form903/Form903Start.action)*

When a complaint is submitted, intake specialists review the information and contact the complainant in order to gather additional details and to determine if the case qualifies as possible housing discrimination. Complaints that are specific

to a state or locality that is part of HUD's Fair Housing Assistance Program are referred to the appropriate parties, who have 30 days to address the complaint.

The City of Goldsboro falls within the jurisdiction of the North Carolina Office of Administrative Hearings (OAH), Civil Rights Division (CRD), Housing Discrimination Section. The NCOAH/CRD-Housing Discrimination Section may be contacted at:

Lamont Goins, Executive Director  
NCOAH/CRD-Housing Discrimination  
Section  
1711 New Hope Church Road  
Raleigh, North Carolina 27609  
(919) 431-3030 OR (866) 324-7474.

If HUD is handling the case, the formal complaint is sent to the complainant for review and is then forwarded to the alleged violator for review and response. A complaint can be submitted to the national HUD office at:

Office of Fair Housing and Equal  
Opportunity  
Department of Housing and Urban  
Development  
Room 5204, 451 Seventh St. SW  
Washington, DC 20410-2000  
1-800-669-9777

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<sup>2</sup> A printable form may be found at  
[https://files.nc.gov/ncoah/documents/files/HOUSING\\_DISCRIMINATION\\_COMPLAINT\\_FORM.pdf](https://files.nc.gov/ncoah/documents/files/HOUSING_DISCRIMINATION_COMPLAINT_FORM.pdf)

The contact information for the regional HUD office in Atlanta is:

Atlanta Regional Office of FHEO  
U.S. Department of Housing and  
Urban Development  
Five Points Plaza  
40 Marietta Street, 16th Floor  
Atlanta, Georgia 30303-2806  
1-800-440-8091

There is also a field HUD office located in Greensboro. The contact information is:

Denise Cleveland-Leggett,  
Regional Administrator  
Greensboro Field Office  
Asheville Building  
1500 Pinecroft Road, Suite 401  
Greensboro, NC 27407-3838  
(336) 547-4000

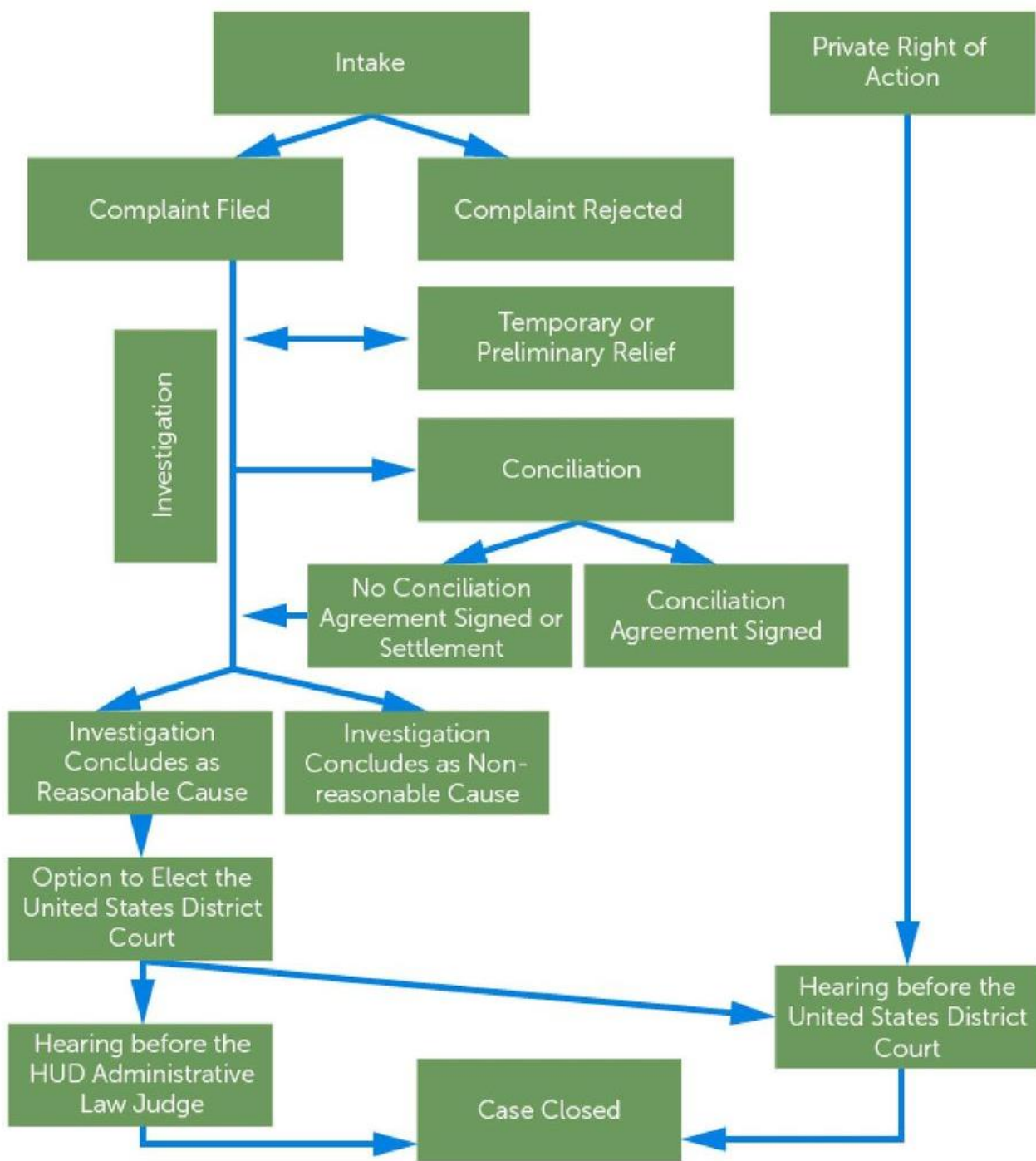
Next, the circumstances of the complaint are investigated through conducting interviews and examining relevant documents. During this time, the investigator attempts to rectify the situation through mediation, if possible. The case is closed if mediation of the two parties is achieved or if the investigator

determines that there was no reasonable cause of discrimination. If reasonable cause is found, then either a federal judge or a HUD Administrative Law Judge hears the case and determines damages, if any. A respondent may be ordered:

- To compensate for actual damages, including humiliation, pain and suffering.
- To provide injunctive or other equitable relief, for example, to make the housing available.
- To pay the Federal Government a civil penalty to vindicate the public interest. The maximum penalties are \$10,000 for a first violation and \$50,000 for an additional violation within seven years.
- To pay reasonable attorney's fees and costs.

### ***Section 504 Complaints***

In addition to general fair housing discrimination complaints, HUD accepts specific complaints that violate Section 504



**Figure 1 - HUD Fair Housing Complaint Process<sup>3</sup>**

<sup>3</sup> Source: Module 3.2 Study Guide HUD Housing Counselors Training U.S. Department of Housing and Urban Development

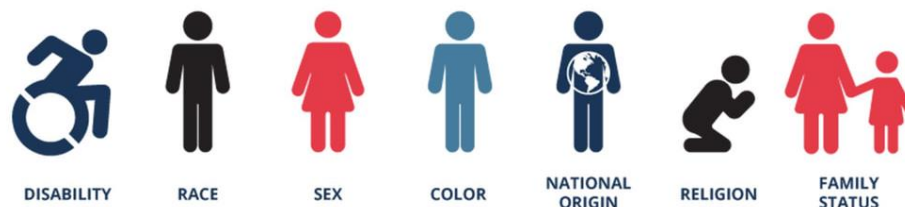
of the Rehabilitation Act of 1973,<sup>4</sup> which prohibits programs or organizations that receive federal funds from discriminating against persons with disabilities. In relation to housing, this means that any housing program that accepts federal monies must promote equal access of units, regardless of disability status. Both mental and physical handicap are included in Section 504. An example of a Section 504 violation is a public housing manager who demands a higher housing deposit to a person in a wheelchair because of the anticipated damage that a wheelchair may cause. This violates Section 504 in that a person cannot be held to different standards or liabilities due to disability. Complaints that are in violation of Section 504 are filed and processed in the

same manner as general fair housing complaints.

### ***Complaint Process for the NCOAH/CRD-Housing Discrimination Section***

In North Carolina, the NC Office of Administrative Hearings accepts fair housing complaints as they are related to fair housing violations in regard to the federal Fair Housing Act or the 1983 State Fair Housing Act.<sup>5</sup> This agency accepts complaints that are alleged to occur in areas that are not covered by existing FHAP agencies (see previous section). Complaints can be submitted by filling out the form (see Appendix C). The complaint form requires information regarding who was involved in the alleged discriminatory act and what violation may have occurred.

# **FAIR HOUSING ACT**



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<sup>4</sup> See [https://www.hud.gov/program\\_offices/fair\\_housing\\_equal\\_opportunity/disability\\_main](https://www.hud.gov/program_offices/fair_housing_equal_opportunity/disability_main)

<sup>5</sup> See State Fair Housing Act at [https://www.ncleg.gov/EnactedLegislation/Statutes/PDF/ByChapter/Chapter\\_41A.pdf](https://www.ncleg.gov/EnactedLegislation/Statutes/PDF/ByChapter/Chapter_41A.pdf)

# COMMUNITY OVERVIEW

The City of Goldsboro is located in Wayne County in the central-eastern part of North Carolina. The County has a total area of 557 square miles and a population of 124,262 (ACS, 2020). Wayne County was established during the American Revolutionary War on November 2, 1779 from the western part of Dobbs County. It was named for "Mad Anthony" Wayne, a general in the war. Wayne County is home to Seymour Johnson Air Force Base (530 officers, and 3,800 enlisted members and families).<sup>6</sup> The largest universities in Wayne County, NC are Wayne Community College and University of Mount Olive (enrollment 3,208).<sup>7</sup>

## Race & Ethnic Characteristics

According to the American Community Survey (ACS) 2020 estimates, Goldsboro, NC was home to an estimated 34,681 people and has lost -12.9% of its population (5,120 individuals fewer) since the 2000 Census. The City is 42.5% White, 48.8% African American, 6.9% Hispanic, and 2.7% Asian.

Evident in the review of the maps of ACS 2020 population data is the higher population density in the northern part of the city and in the area around Seymour Johnson Air Force Base. In these Census block groups we see 1,500-2,500 persons or more. However, in the western part of the City there are Census block groups where the populations are less than 1,000 or even less than 500. Maps of poverty and income show that these areas have low median incomes and high poverty rates. Neighborhoods in the west and south in particular are also where we see a concentration of Black or African American populations (>70%). Conversely in the areas of the Air Force Base and northeast neighborhoods are 60% or more non-Hispanic white. There is only one Census block group where the predominant racial or ethnic group is Hispanic - just south of the base.

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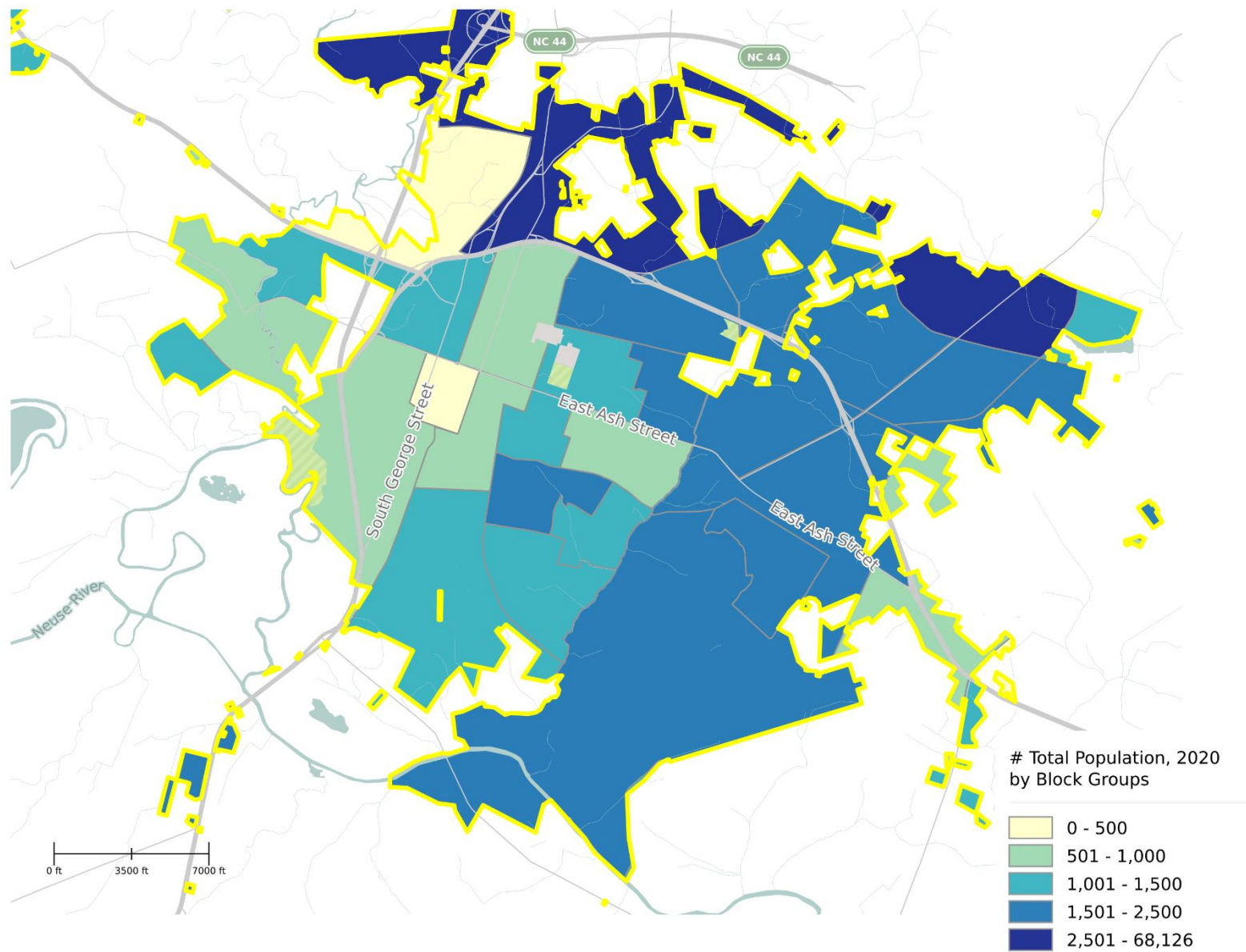
<sup>6</sup> <http://www.militarybases.us/air-force/seymour-johnson-afb/>

<sup>7</sup> <https://www.univstats.com/colleges/university-of-mount-olive/student-population/>

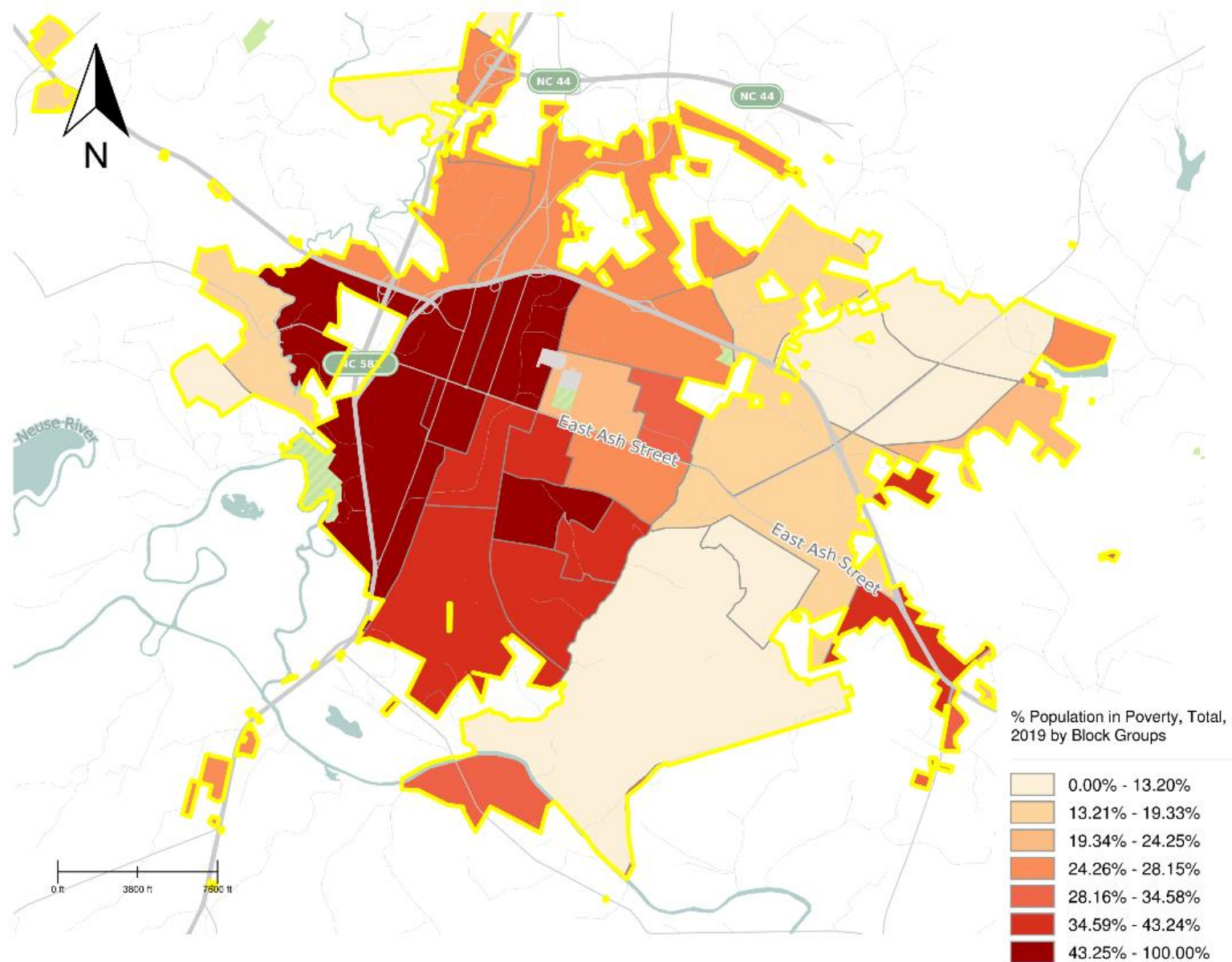


**Table 1 – Demographic Characteristics (ACS 2020)**

	<b>Goldsboro</b>		<b>Wayne County</b>		<b>North Carolina</b>	
<b>POPULATION &amp; SEX</b>						
<b>Total Population</b>	34,681		124,262		10,356,555	
<b>Male</b>	17,011	49.1%	60,666	48.8%	5,037,398	48.6%
<b>Female</b>	17,668	50.9%	63,533	51.1%	5,313,845	51.3%
<b>AGE</b>						
<b>Under 5 years</b>	2,165	6.2%	8,369	6.7%	600,815	5.8%
<b>5 to 9 years</b>	2,030	5.9%	7,580	6.1%	635,453	6.1%
<b>10 to 14 years</b>	1,631	4.7%	8,202	6.6%	659,334	6.4%
<b>15 to 17 years</b>	1,415	4.1%	4,905	4.0%	410,360	4.0%
<b>18 and 19 years</b>	927	2.7%	3,210	2.6%	297,890	2.9%
<b>20 to 24 years</b>	3,422	9.9%	9,842	7.9%	755,238	7.3%
<b>25 to 34 years</b>	5,544	16.0%	16,221	13.1%	1,344,751	13.0%
<b>35 to 44 years</b>	3,359	9.7%	14,066	11.3%	1,268,665	12.3%
<b>45 to 54 years</b>	3,952	11.4%	14,959	12.0%	1,338,742	12.9%
<b>55 to 64 years</b>	4,490	13.0%	15,778	12.7%	1,298,568	12.5%
<b>65 to 74 years</b>	3,224	9.3%	11,468	9.2%	987,845	9.5%
<b>75 to 84 years</b>	1,616	4.7%	6,279	5.1%	474,894	4.6%
<b>85 years and over</b>	882	2.5%	2,108	1.7%	178,545	1.7%
<b>RACE &amp; ETHNICITY</b>						
<b>White alone</b>	14,722	42.5%	78,789	63.4%	6,992,191	67.5%
<b>African American alone</b>	16,916	48.8%	36,388	29.3%	2,216,020	21.4%
<b>American Indian alone</b>	109	0.3%	461	0.4%	134,942	1.3%
<b>Asian alone</b>	931	2.7%	1,795	1.4%	325,205	3.1%
<b>Pacific Islander alone</b>	48	0.1%	63	0.1%	9,302	0.1%
<b>Some other race alone</b>	0	0.0%	1,885	1.5%	364,733	3.5%
<b>Two or more races</b>	1,952	5.6%	4,753	3.8%	303,501	2.9%
<b>Not Hispanic or Latino</b>	32,274	93.1%	108,481	87.3%	9,325,912	90.1%
<b>Hispanic or Latino</b>	2,406	6.9%	15,721	12.7%	1,026,085	9.9%

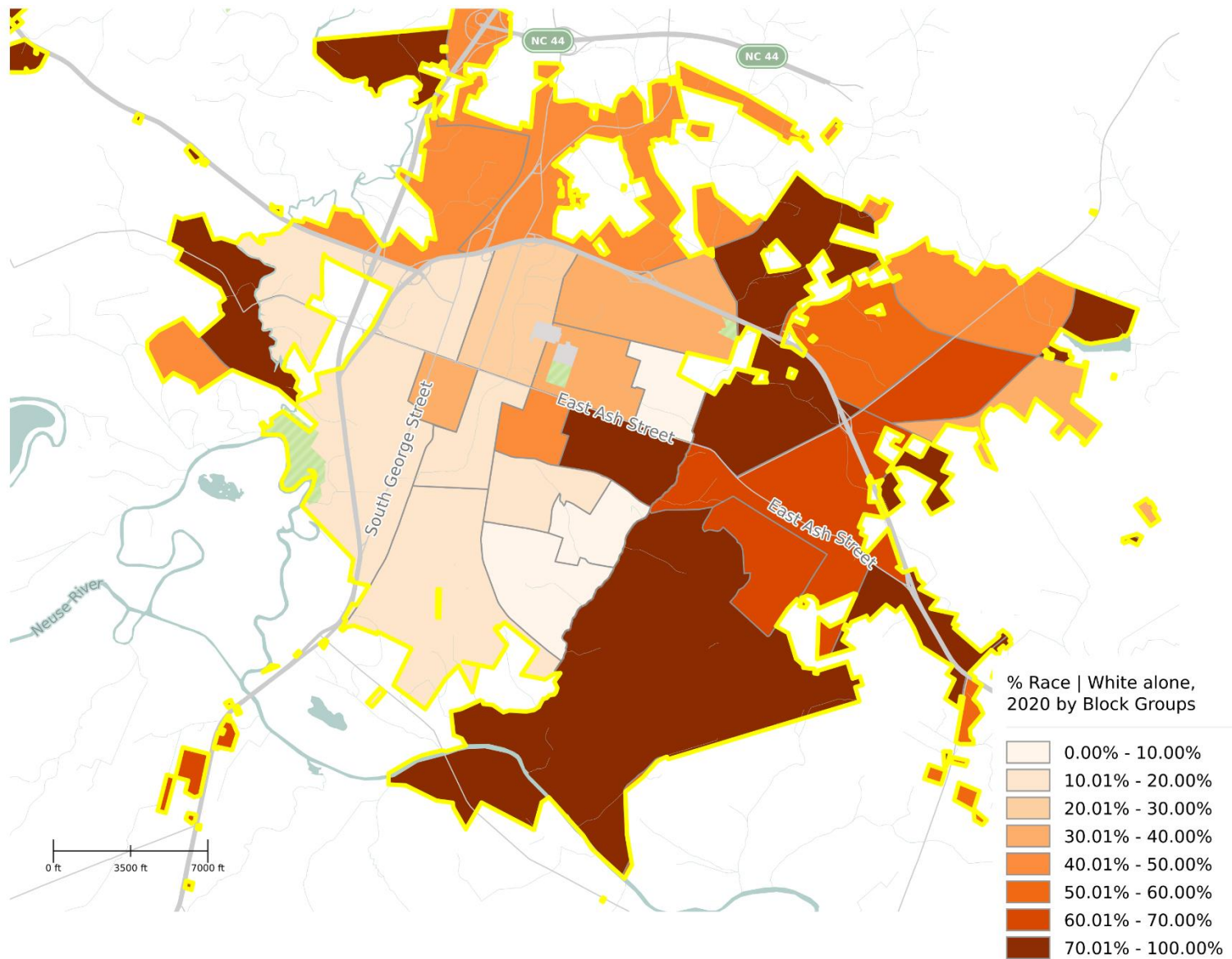


**Figure 2 – Total Population by Block Group (ACS 2020)**



**Figure 3 -Goldsboro Poverty by Block Group (ACS 2019) \* 2020 Estimates at Block Group level are unavailable**





**Figure 4 - Percent White by Block Group (ACS 2020)**

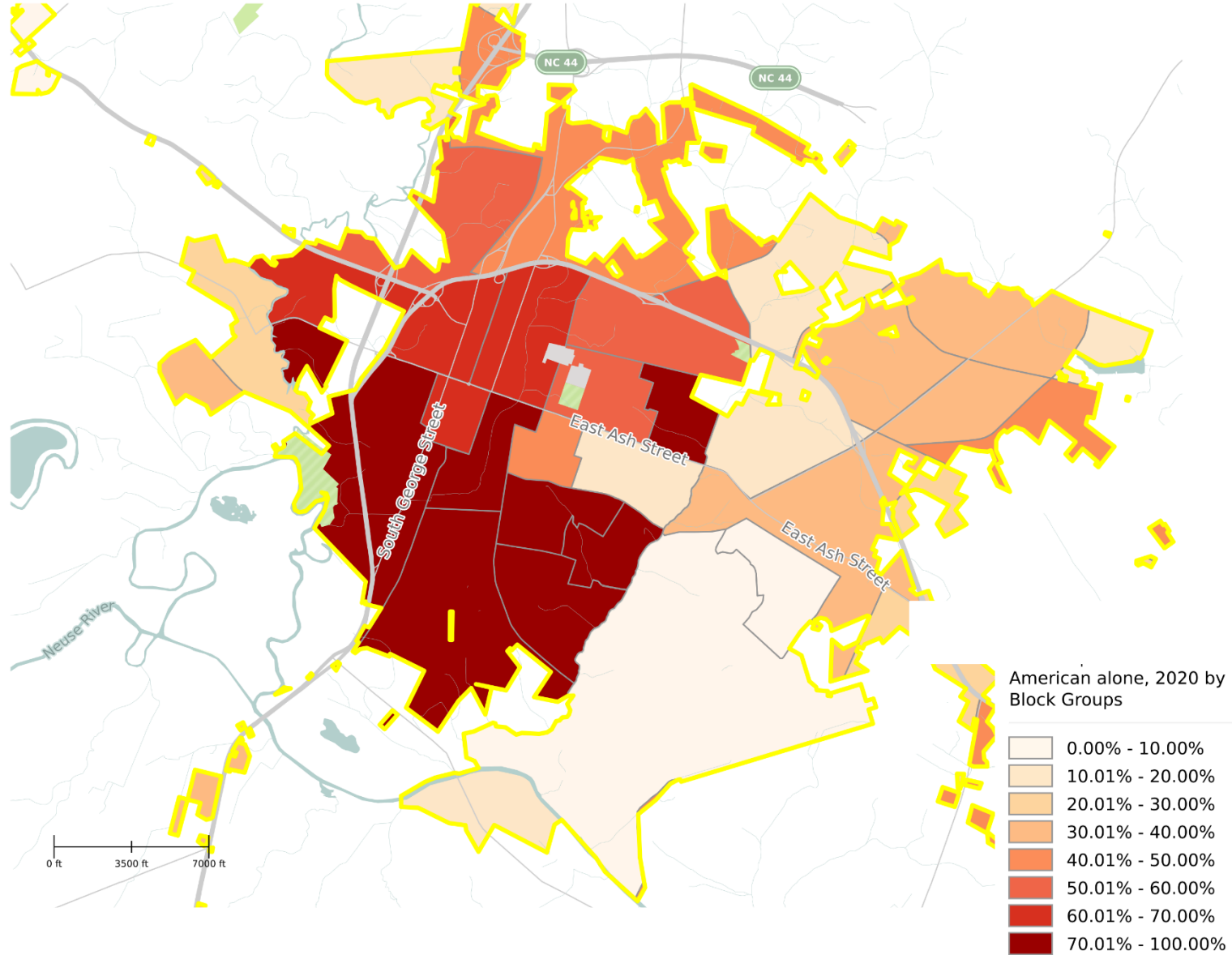


Figure 5 - Percent African American by Block Group (ACS 2020)

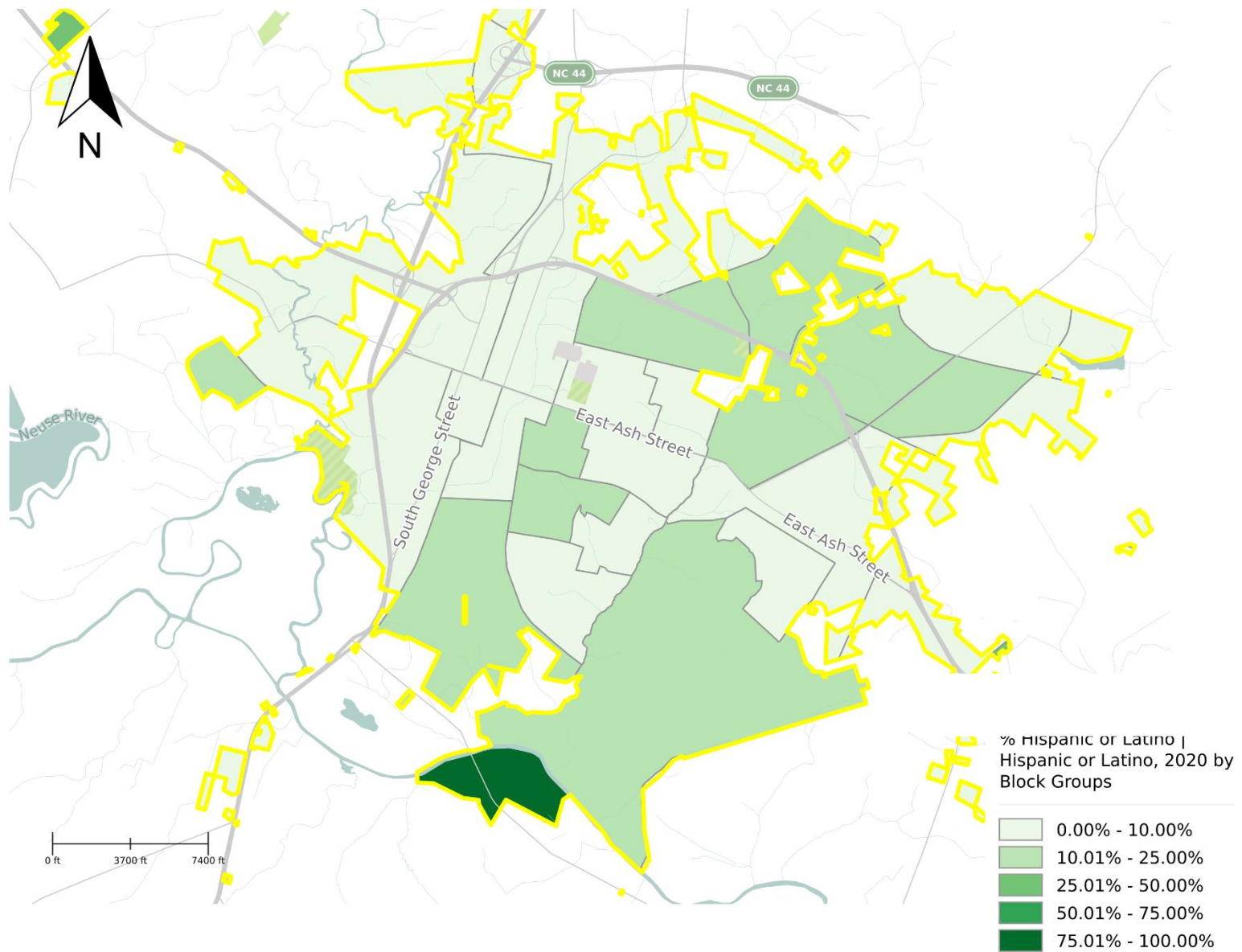
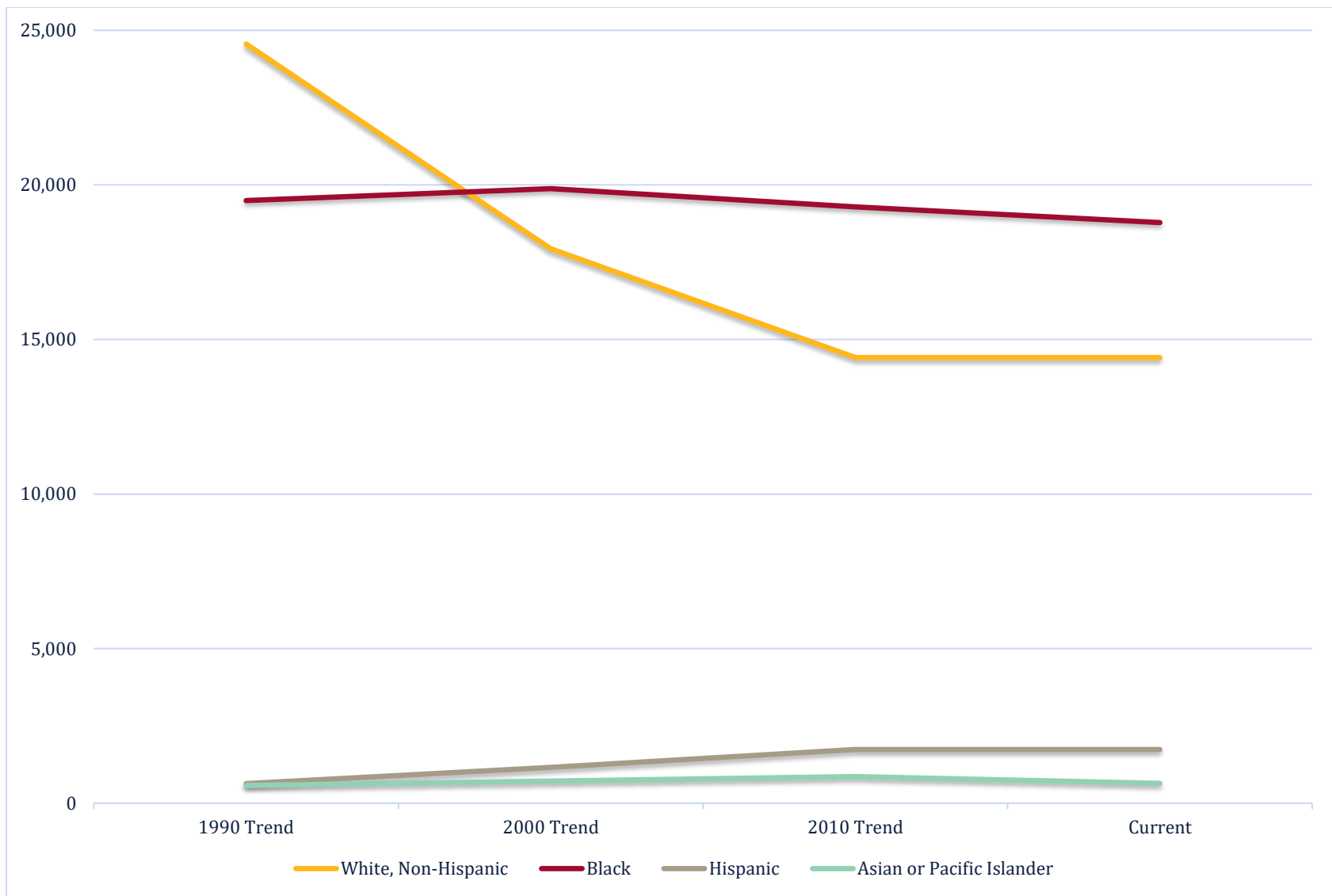


Figure 6 - Percent Hispanic by Block Group (ACS 2020)

Table 2 – Demographic Trends 1990-2020 (AFFH-T 2020)

Goldsboro, NC CDBG/HOME Jurisdiction								
	1990 Trend		2000 Trend		2010 Trend		Current	
Race/Ethnicity	#	%	#	%	#	%	#	%
White, Non-Hispanic	24,559	54.06%	17,934	44.83%	14,416	39.47%	14,416	39.47%
Black	19,496	42.92%	19,880	49.70%	19,287	52.81%	18,782	51.43%
Hispanic	633	1.39%	1,153	2.88%	1,736	4.75%	1,736	4.75%
Asian or Pacific Islander	571	1.26%	714	1.78%	860	2.35%	644	1.76%
Native American	109	0.24%	202	0.50%	146	0.40%	92	0.25%
National Origin								
Foreign-born	888	1.96%	964	2.41%	1,201	3.29%	1,753	4.80%
Limited English Proficiency	779	1.72%	711	1.78%	658	1.80%	1,095	3.00%



**Figure 7 – Demographic Trends by Race & Ethnicity Goldsboro 1990- 2020**



## Demographic Trends 1990-2020

Over the last 30 years, Goldsboro's ethnic and racial makeup has transitioned from a predominately black-white binary to more diverse and more non-white. The white non-Hispanic population has decreased by more than 10,000 while the African American population has held fairly constant and the Hispanic population has tripled.

## National Origin

Data from the U.S. Census indicate that 2,198 people or 6.3% of the population living in Goldsboro were "foreign born" including 1,537 naturalized citizens. Data compiled by HUD in the AFFH Tool (2020), shows that of the foreign born population, most are Mexican (n=220), Cuban (n=215), or from other Central American countries (n=195). The small Asian population in Goldsboro is predominantly from China (n=180). Spanish and Chinese are the leading languages of Limited English Proficient (LEP) households.

## Disability Status

17.9% of the civilian noninstitutionalized population has one or more types of

disabilities (ACS 2015-2019). Ambulatory difficulty was the largest category of disability (n=3,521) followed by 2,207 individuals with cognitive difficulties, and 2,147 with independent living difficulty. Over 1,000 individuals have issues with self-care, vision, and/or hearing. Nearly three-quarters (74.8%) of persons with a disability are not employed and 27.0% of those with a disability are living in poverty (ACS 2015-2019).

**Table 3 – Disability Characteristics (AFFH-T 2020)**

Disability Type	#	%
Hearing	1,005	3.37%
Vision	1,156	3.88%
Cognitive	2,207	7.41%
Ambulatory	3,521	11.82%
Self-care	1,379	4.63%
Independent living	2,147	7.20%

**Table 4 – Disability by Age (AFFH-T 2020)**

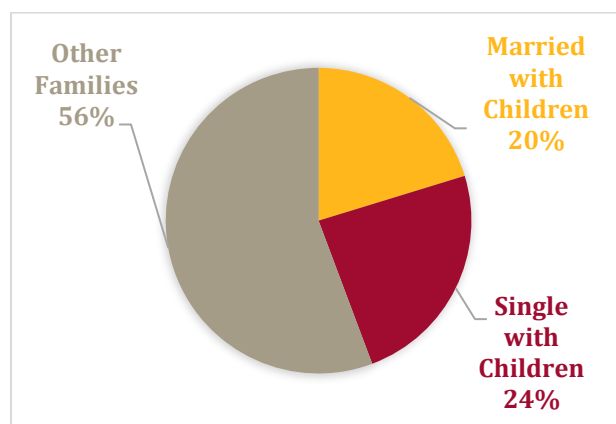
Age	#	%
5-17	469	1.57%
18-64	2,940	9.87%
65+	2,315	7.77%

**Table 5 – National Origin and LEP Characteristics (AFFH-T 2020)**

<b>(Goldsboro, NC CDBG) Jurisdiction</b>			
<b>National Origin</b>			
#1 country of origin	Mexico	220	0.67%
#2 country of origin	Cuba	215	0.66%
#3 country of origin	Other Central America	195	0.60%
#4 country of origin	China excl. Taiwan	180	0.55%
#5 country of origin	El Salvador	95	0.29%
#6 country of origin	Philippines	80	0.24%
#7 country of origin	Other Caribbean	70	0.21%
#8 country of origin	Germany	59	0.18%
#9 country of origin	Ireland	45	0.14%
#10 country of origin	Vietnam	44	0.13%
<b>Limited English Proficiency (LEP)</b>			
#1 LEP Language	Spanish	1,500	4.58%
#2 LEP Language	Other & Unspecified Language	350	1.07%
#3 LEP Language	Chinese	205	0.63%
#4 LEP Language	French	160	0.49%
#5 LEP Language	Other Indo-European Language	130	0.40%
#6 LEP Language	West Germanic Language	105	0.32%
#7 LEP Language	Tagalog	100	0.31%
#8 LEP Language	Other Asian & Pacific Language	94	0.29%
#9 LEP Language	Vietnamese	74	0.23%
#10 LEP Language	Slavic Language	50	0.15%

## Family Status

Approximately 16.5 % of the population is over the age of 65, 62.6% are of working age (18-64), 20.9% are under 18, and 6.2% are under 5 years old. Average household size was 2.3 (ACS 2015-2019). Of 14,404 households, 8,320 were considered ‘family’ households with 1,686 married persons with children, 1,999 single persons with children (of whom 1,862 were single females with children), and 4,635 other family households.



**Figure 8 - Family Households (ACS 2015-2019)**

## **Income & Employment**

The median household income in 2020 was \$32,250.73 compared to the state of North Carolina with a median of \$52,430 (ACS). Moreover 30.7% of the households in (4,364 households in total) had an income below \$20,000. Likewise, more than a quarter of the residents of Goldsboro (26.1% or 8,540 individuals) live below the poverty level.

Health Care and Social Assistance Industry Employment accounts for 18.8% of the workforce (2,295 jobs). Retail Trade Industry Employment follows with 1,820 positions or 14.9% of the workforce. Manufacturing Industry Employment account for 1,656 jobs or 13.6%. Finally, Accommodation and Food Services employs 1,314 or 10.8% of workers. According to the Bureau of Labor Statistics, pre-pandemic unemployment hovered at about 5-6% (about 2% higher than the state of North Carolina). During the pandemic, local unemployment peaked at 14.2% (May 2020) and now sits at about 9.2% (3% higher than the average for NC).

More than a quarter of households (27.6%) of households received public assistance income/food stamps/SNAP in the last 12 months (ACS 2020). In households with

children the rate increases to 49.7% of households.

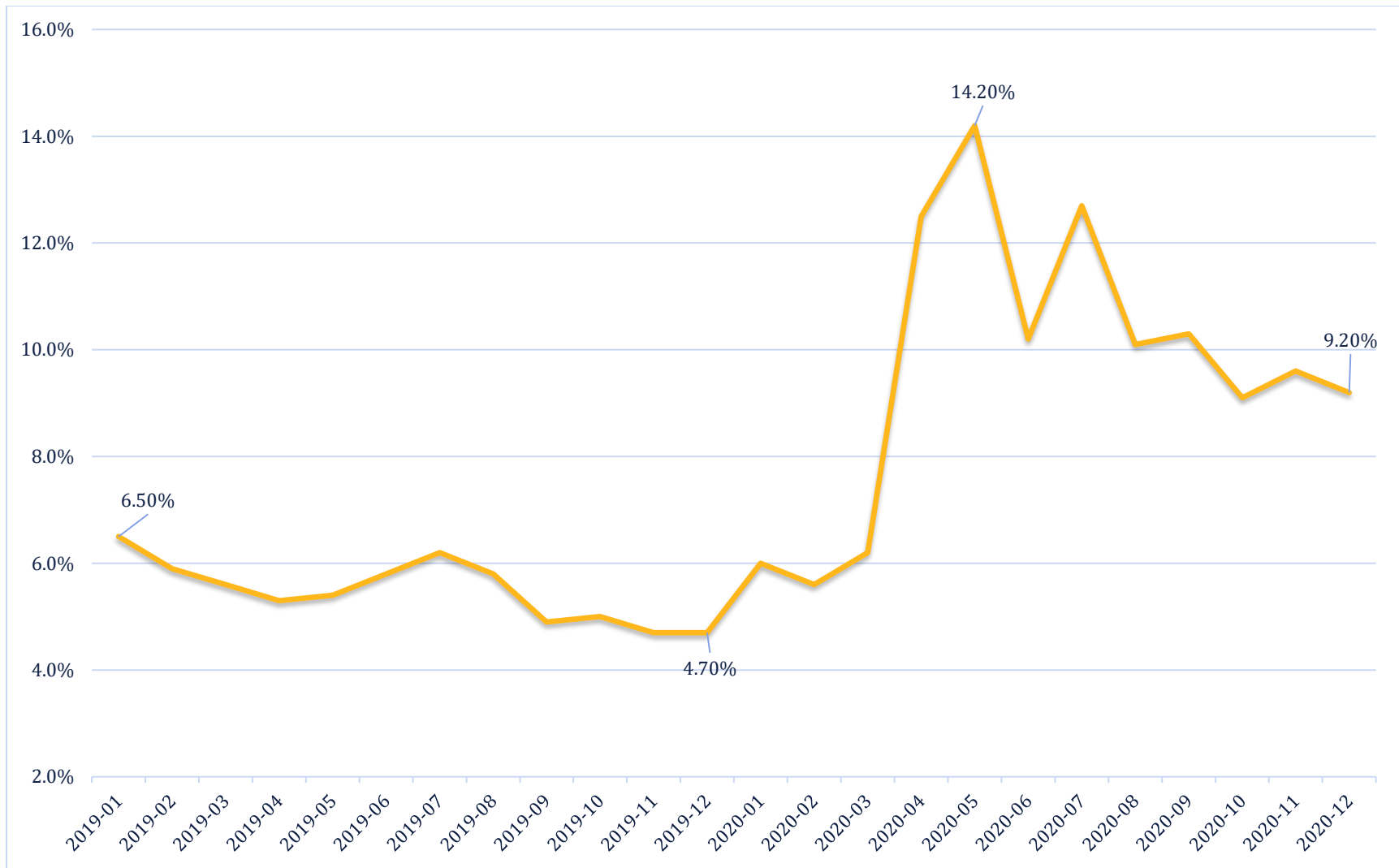
About one-in-four (25.0%) homeowners and nearly half (47.1%) of renters are cost burdened, spending more than 30% of income on housing-related costs (ACS 2015-2019). The average household spent \$10,078 on transportation costs in 2020 (Easy Analytic Software, Inc. - Consumer Expenditures (CEX) Database) yet 16.8% of households do not have a vehicle (SimplyAnalytics est 2020). The average household spent \$4,209 on fuel and public services, \$1,579 on electricity, \$643 on water and sewer in 2020 (Consumer Expenditures (CEX) Database).

## **Health Care**

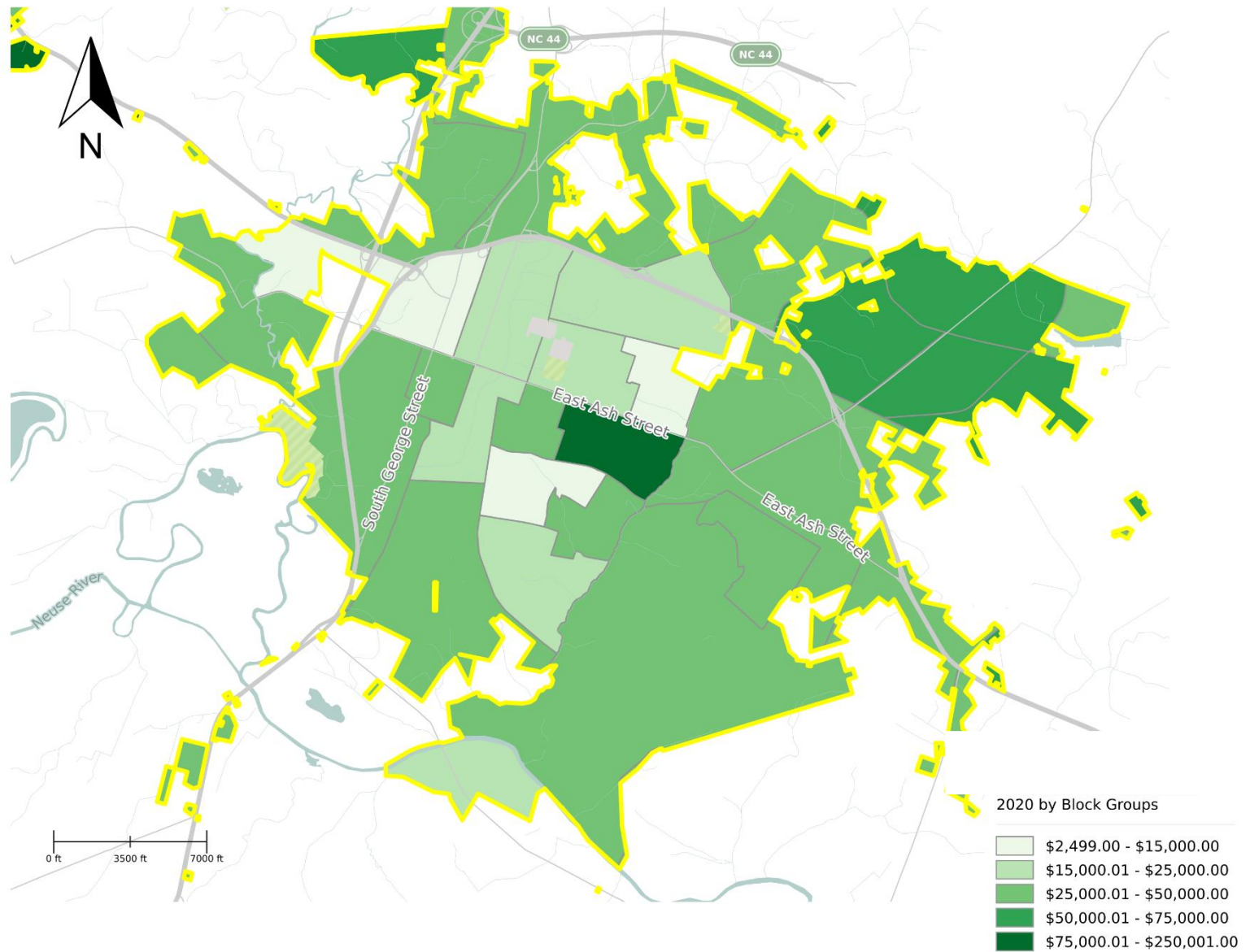
Nearly all census tracts in Wayne County have been designated as Medically Underserved Areas for having too few primary care providers, high infant mortality, high poverty, and/or a high elderly population by the Health Resources and Services Administration (HRSA 2019). About a quarter of residents (23.57%) self-report poor physical health and a fifth (20.98%) report poor mental health in the past 30 days (CDC BRFSS, 2013).

Table 6 - Economic Characteristics (ACS 2020)

	Goldsboro, NC		Wayne County, NC		North Carolina	
<b>INCOME</b>						
<b>Median HH Income</b>	\$32,251		\$42,136		\$52,430	
<b>Per Capita Income</b>	\$21,276		\$24,026		\$29,508	
<b>Households</b>	14,205		47,982		3,983,257	
<b>Less than \$10,000</b>	1,659	11.7%	3,303	6.9%	251,378	6.3%
<b>\$10,000 to \$19,999</b>	2,705	19.0%	6,666	13.9%	409,961	10.3%
<b>\$20,000 to \$29,999</b>	2,413	17.0%	7,013	14.6%	414,991	10.4%
<b>\$30,000 to \$39,999</b>	1,412	9.9%	5,856	12.2%	403,734	10.1%
<b>\$40,000 to \$49,999</b>	1,262	8.9%	4,477	9.3%	374,169	9.4%
<b>\$50,000 to \$59,999</b>	1,003	7.1%	3,602	7.5%	316,632	8.0%
<b>\$60,000 to \$74,999</b>	1,479	10.4%	4,175	8.7%	383,624	9.6%
<b>\$75,000 to \$99,999</b>	762	5.4%	4,887	10.2%	470,387	11.8%
<b>\$100,000 to \$124,999</b>	848	6.0%	3,162	6.6%	313,588	7.9%
<b>\$125,000 to \$149,999</b>	260	1.8%	1,922	4.0%	196,387	4.9%
<b>\$150,000 to \$199,999</b>	107	0.8%	1,140	2.4%	199,601	5.0%
<b>\$200,000 or more</b>	286	2.0%	1,293	2.7%	211,051	5.3%
<b>EDUCATION</b>						
<b>Less than HS</b>	3,104	13.5%	14,199	17.1%	964,635	13.6%
<b>High school/ GED</b>	6,928	30.0%	23,978	28.9%	1,710,790	24.2%
<b>Some college</b>	6,112	26.5%	17,314	20.9%	1,473,692	20.8%
<b>Associate's degree</b>	1,912	8.3%	9,529	11.5%	671,548	9.5%
<b>Bachelor's degree</b>	3,524	15.3%	12,038	14.5%	1,376,885	19.5%
<b>Master's degree</b>	1,095	4.7%	3,869	4.7%	583,652	8.3%
<b>Professional degree</b>	261	1.1%	637	0.8%	131,020	1.9%
<b>Doctorate degree</b>	130	0.6%	672	0.8%	103,972	1.5%

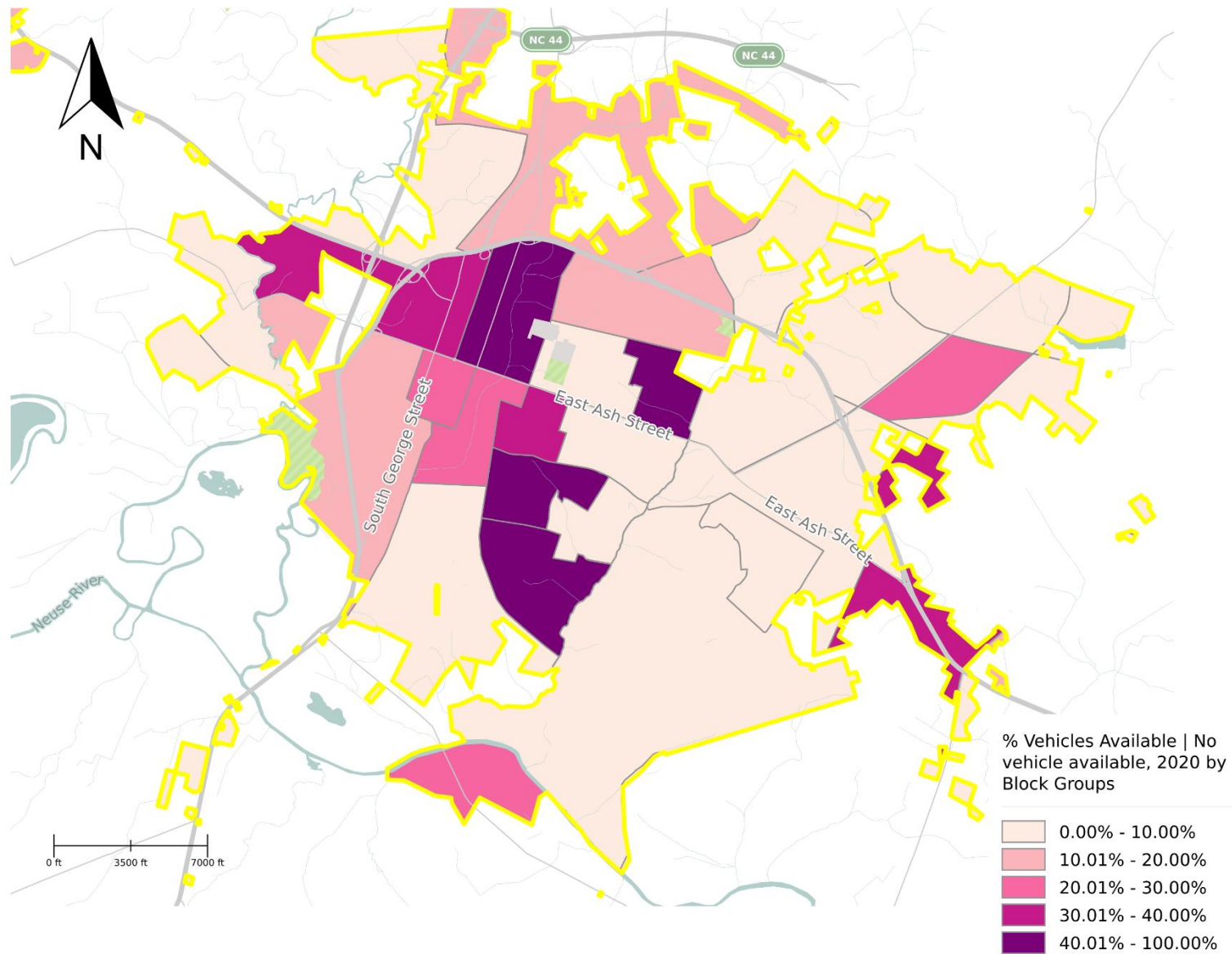


**Figure 9 - Goldsboro Monthly Unemployment Rates (Bureau of Labor Statistics 2019-2020)**



**Figure 10 -Goldsboro Median Household Income (ACS 2020)**





**Figure 11 -Goldsboro Household without a Vehicle (ACS 2020)**

# PUBLIC SECTOR HOUSING

## HUD Subsidized Households

Since 1937, the federal government has provided housing assistance to low-income renters. Currently, households pay rent equal to 30 percent of their incomes, after deductions, while the federal government pays the remainder of rent or rental costs. To qualify for a subsidy, an applicant's income must initially fall below a certain income limit. Applicants for housing assistance are usually placed on a waiting list until a subsidized unit becomes available.

Tenant assistance is the most common form of housing assistance provided. Tenant based programs allow participants to find and lease housing in the private market. The housing must meet housing quality standards and other program requirements. The subsidies are used to supplement the rent paid by low-income households. Another HUD rental assistance is a collection of programs generally referred to as multifamily assisted, or privately-owned, project-based housing. What these programs have in common is that they provide rental housing that is owned by

private landlords who enter into contracts with HUD in order to receive housing subsidies. The subsidies pay the difference between tenant rent and total rental costs.

## Goldsboro Housing Authority

The Housing Authority of the City of Goldsboro (HACG) provides Public Housing and Section 8 Housing Choice Vouchers to qualifying residents and is funded by the Department of Housing and Urban Development (HUD). HACG was established in 1950 and is governed by a seven-member Board of Commissioners appointed by the Mayor. HACG serves a diverse population that includes elderly, children, and disabled residents. The goals of HACG are:

1. Maintain and enhance resident safety and security.
2. Expand home ownership opportunities and self-sufficiency programs.
3. Increase assisted housing choices to meet demand.
4. Ensure a well-maintained housing stock.
5. Promote fair housing and equal opportunity.



## Public Housing Properties

Most of HACG inventory and other subsidized housing in Goldsboro is geographically located in predominantly lower income and minority populated areas. These very affordable units tend to limit choice by their location.

### Demographics

According to data from the AFFH Tool (AFFHT006), there were 1,293 Public Housing units (12.1% of all housing in Goldsboro) including: 523 Project-based Section 8 units, 154 Housing Choice Vouchers recipients, and 91 units in other multifamily supported housing programs. All of the Public Housing facilities were located in areas of >20% poverty.

In the Goldsboro HOME/CDBG Jurisdiction, 92.4% of public housing residents are African American. A third of Section-8 tenants are white while 62.2% are African American. Two-fifths (42.8%) of Public Housing units are concentrated in the R/ECAP in western Goldsboro. About half of all subsidized units are occupied by families with children and about 17.4% of all residents have a disability.

There are clear differences in occupancy by race/ethnicity as Waynesborough House Apartments and Kirkwood Apartments are predominantly white while all other subsidized programs are predominately African American. The average family expenditure per month for housing of subsidized residents in Goldsboro was \$247 and the average household income was \$10,652 or about 20% of AMI.<sup>8</sup>

### Fair Market Rent

The Fair Market Rent (FMR) set by HUD for 2021 in the Goldsboro MSA is \$827 for a two bedroom. These rent limits drive public affordable housing. According to HUD, Fair Market Rents are used to determine payment standard amounts for the Housing Choice Voucher program and for many other means tested programs.

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<sup>8</sup> See *Picture of Subsidized Households*  
<https://www.huduser.gov/portal/datasets/assthsg.html>

**Table 7 - Publicly Supported Housing Units by Program Category**

<b>Units by Program Category (Goldsboro, NC CDBG) Jurisdiction</b>		
Housing Units	#	%
<b>Total housing units</b>	17,062	-
<b>Public Housing</b>	1,293	7.58%
<b>Project-based Section 8</b>	523	3.07%
<b>Other Multifamily</b>	91	0.53%
<b>HCV Program</b>	154	0.90%

Note 1: Data Sources: Decennial Census; APSH

**Table 8 - Disability by Publicly Supported Housing Program Category**

<b>(Goldsboro, NC CDBG) Jurisdiction</b>		
	#	%
<b>Public Housing</b>	252	20.28%
<b>Project-Based Section 8</b>	41	8.05%
<b>Other Multifamily</b>	11	12.50%
<b>HCV Program</b>	38	28.12%

**Table 9 - Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children**

<b>(Goldsboro, NC CDBG) Jurisdiction</b>								
	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		Households in 3+ Bedroom Units		Households with Children	
<i>Housing Type</i>	#	%	#	%	#	%	#	%
<b>Public Housing</b>	251	20.19%	483	38.86%	507	40.79%	636	51.17%
<b>Project-Based Section 8</b>	243	47.37%	119	23.20%	151	29.43%	204	39.77%
<b>Other Multifamily</b>	83	94.32%	0	0.00%	0	0.00%	N/a	N/a
<b>HCV Program</b>	38	27.86%	41	30.26%	57	41.88%	62	45.67%

Note 1: Data Sources: APSH

**Table 10 - Final FY 2021 & Final FY 2020 FMRs By Unit Bedrooms (HUD 2021)**

Year	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
<b>FY 2021 FMR</b>	\$623	\$628	\$827	\$1,029	\$1,395
<b>FY 2020 FMR</b>	\$612	\$617	\$812	\$1,012	\$1,361

Race/Ethnicity								
Goldsboro (HOME/CDBG) Jurisdiction	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	74	5.96%	1,147	92.43%	20	1.61%	0	0.00%
Project-Based Section 8	171	33.33%	319	62.18%	16	3.12%	3	0.58%
Other Multifamily	2	2.41%	81	97.59%	0	0.00%	0	0.00%
HCV Program	5	3.36%	128	93.71%	4	2.93%	0	0.00%
Total Households	5,405	39.03%	7,216	52.10%	680	4.91%	250	1.81%
0-30% of AMI	419	17.19%	1,798	73.75%	100	4.10%	50	2.05%
0-50% of AMI	1,043	22.81%	3,133	68.53%	185	4.05%	75	1.64%
0-80% of AMI	1,992	27.62%	4,392	60.91%	500	6.93%	135	1.87%

Note 1: Data Sources: Decennial Census; APSH; CHAS

Note 2: Numbers presented are numbers of households not individuals.

Note 3: Refer to the Data Documentation for details ([www.hudexchange.info/resource/4848/affh-data-documentation](http://www.hudexchange.info/resource/4848/affh-data-documentation)).

(Goldsboro, NC CDBG) Jurisdiction	Total # units (occupied)	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with children	% Elderly	% with a disability
Public Housing								
R/ECAP tracts	532	7.33%	91.17%	1.50%	0.00%	57.14%	20.30%	17.49%
Non R/ECAP tracts	710	4.94%	93.37%	1.69%	0.00%	46.69%	22.22%	22.36%
Project-based Section 8								
R/ECAP tracts	N/a	N/a	0.00%	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	500	33.33%	62.18%	3.12%	0.58%	39.77%	45.03%	8.05%
Other Multifamily								
R/ECAP tracts	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
Non R/ECAP tracts	43	0.00%	100.00%	0.00%	0.00%	N/a	89.36%	23.40%
HCV Program								
R/ECAP tracts	17	0.00%	100.00%	0.00%	0.00%	52.94%	29.41%	20.00%
Non R/ECAP tracts	116	3.95%	92.61%	3.44%	0.00%	44.81%	31.18%	29.51%

Note 1: Disability information is often reported for heads of household or spouse/co-head only. Here, the data reflect information on all members of the household.

Note 2: Data Sources: APSH

Note 3: Refer to the Data Documentation for details ([www.hudexchange.info/resource/4848/affh-data-documentation](http://www.hudexchange.info/resource/4848/affh-data-documentation)).

**Table 11 - Demographics of Publicly Supported Housing Developments, by Program Category**

<b>Public Housing</b>								
<b>(Goldsboro, NC CDBG) Jurisdiction</b>								
<b>Development Name</b>	<b>Code</b>	<b>PHA Name</b>	<b># Units</b>	<b>White</b>	<b>Black</b>	<b>Hispanic</b>	<b>Asian</b>	<b>Children</b>
<b>WOODCREST-ELMWOOD-LITTLE WASHINGTON</b>	NC015	Housing Authority of the City of Goldsboro	275	5.7	92.78	1.52	N/a	60.08
<b>WEST HAVEN APARTMENTS</b>	NC015	Housing Authority of the City of Goldsboro	298	8.92	89.59	1.49	N/a	54.28
<b>FAIRVIEW APARTMENTS</b>	NC015	Housing Authority of the City of Goldsboro	249	7.63	89.96	2.41	N/a	42.97
<b>BROOKSIDE MANOR</b>	NC010	Eastern Carolina Regional Housing Authority	90	2.27	97.73	0	N/a	50
<b>WINFREY COURT II</b>	NC010	Eastern Carolina Regional Housing Authority	90	2.25	96.63	1.12	N/a	41.57
<b>LINCOLN APARTMENTS</b>	NC015	Housing Authority of the City of Goldsboro	289	4.24	93.99	1.77	N/a	50.88
<b>MISSING</b>	NC015	Housing Authority of the City of Goldsboro	2	N/a	N/a	N/a	N/a	N/a
<b>Project-Based Section 8</b>								
<b>(Goldsboro, NC CDBG) Jurisdiction</b>								
<b>Development Name</b>	<b>Code</b>	<b>PHA Name</b>	<b># Units</b>	<b>White</b>	<b>Black</b>	<b>Hispanic</b>	<b>Asian</b>	<b>Children</b>
<b>WAYNESBOROUGH HOUSE APARTMENTS</b>	N/a	N/a	80	56.79	37.04	1.23	2.47	N/a
<b>JEFFERSON COURT</b>	N/a	N/a	55	1.89	90.57	7.55	N/a	62.26
<b>KIRKWOOD APARTMENTS</b>	N/a	N/a	140	76.09	18.84	3.62	0.72	N/a
<b>ALPHA ARMS APARTMENTS</b>	N/a	N/a	88	0	97.67	1.16	N/a	73.26
<b>THE GRAND AT DAY POINT</b>	N/a	N/a	160	12.26	84.52	3.23	N/a	69.68
<b>Other Multifamily Assisted Housing</b>								
<b>(Goldsboro, NC CDBG) Jurisdiction</b>								
<b>Development Name</b>	<b>Code</b>	<b>PHA Name</b>	<b># Units</b>	<b>White</b>	<b>Black</b>	<b>Hispanic</b>	<b>Asian</b>	<b>Children</b>
<b>CHC OF WAYNE COUNTY</b>	N/a	N/a	6	N/a	N/a	N/a	N/a	N/a
<b>POPLAR STREET HOUSING, INC.</b>	N/a	N/a	44	0	100	0	N/a	N/a

# PRIVATE SECTOR HOUSING

## Housing Stock

There were an estimated 16,435 housing units in this jurisdiction. The majority of the housing stock (50.0%) is single family detached, followed by units in small apartment buildings (26.6%), duplexes (10.7%), and single family attached (townhomes) at 5.8%. The median year a housing unit was built is 1974 with wide variation by neighborhood. About 6.6% of houses were built before 1940, 38.0% between 1940 and 1969, 40.7% of between 1970 and 1999, and 14.7% are 2000 or newer. New construction is limited with a total of 272 new building permits issued in the Metro Area (2018). An estimated 1.96% of housing units lack complete plumbing facilities and 5.81% lack complete kitchens.

As noted in the City of Goldsboro 2010-2014 Consolidated Plan And 2010-2011 Annual Action Plan, “it is estimated that 3,285 (20%) [of housing units] are substandard and those suited for rehabilitation accounted for 2,616 or 80% of all substandard units. These figures are based on the number of homes built before 1950 plus the number of homes that lack complete plumbing and kitchen facilities, and the number of homes that lack a source of heat.”<sup>9</sup> Further, according to the Consolidated Plan there are recognized barriers to Fair Housing access including: Affordability, Awareness, Unit Size, Education, Accessibility, and Credit. Most of the stock is two (35.7%) or three bedrooms (40.4%), with 13.1% having four or more bedrooms. 7.0% being one-bedroom, and 3.7% studios.

**Table 12- Housing Stock by Type City of Goldsboro (ACS 2015-2019)**

	Number of Units	Percent of Units
Single family detached homes	8,218	50%
Single family attached homes	956	5.82%
2-unit homes and duplexes	1,753	10.67%
Units in small apartment buildings	4,366	26.57%
Units in large apartment buildings	562	3.42%
Mobile or manufactured housing	580	3.53%
Other types	0	0%

<sup>9</sup> [https://www.goldsboronc.gov/wp-content/uploads/consolidated\\_plan11.pdf](https://www.goldsboronc.gov/wp-content/uploads/consolidated_plan11.pdf)

# Goldsboro, NC

Percent Affordable Renter Units, 2020 (defined as units renting at or less than 30% of household income for a household with income at 50% of AMI) by Census Tract  
Data Source: HUD AFFHT0006

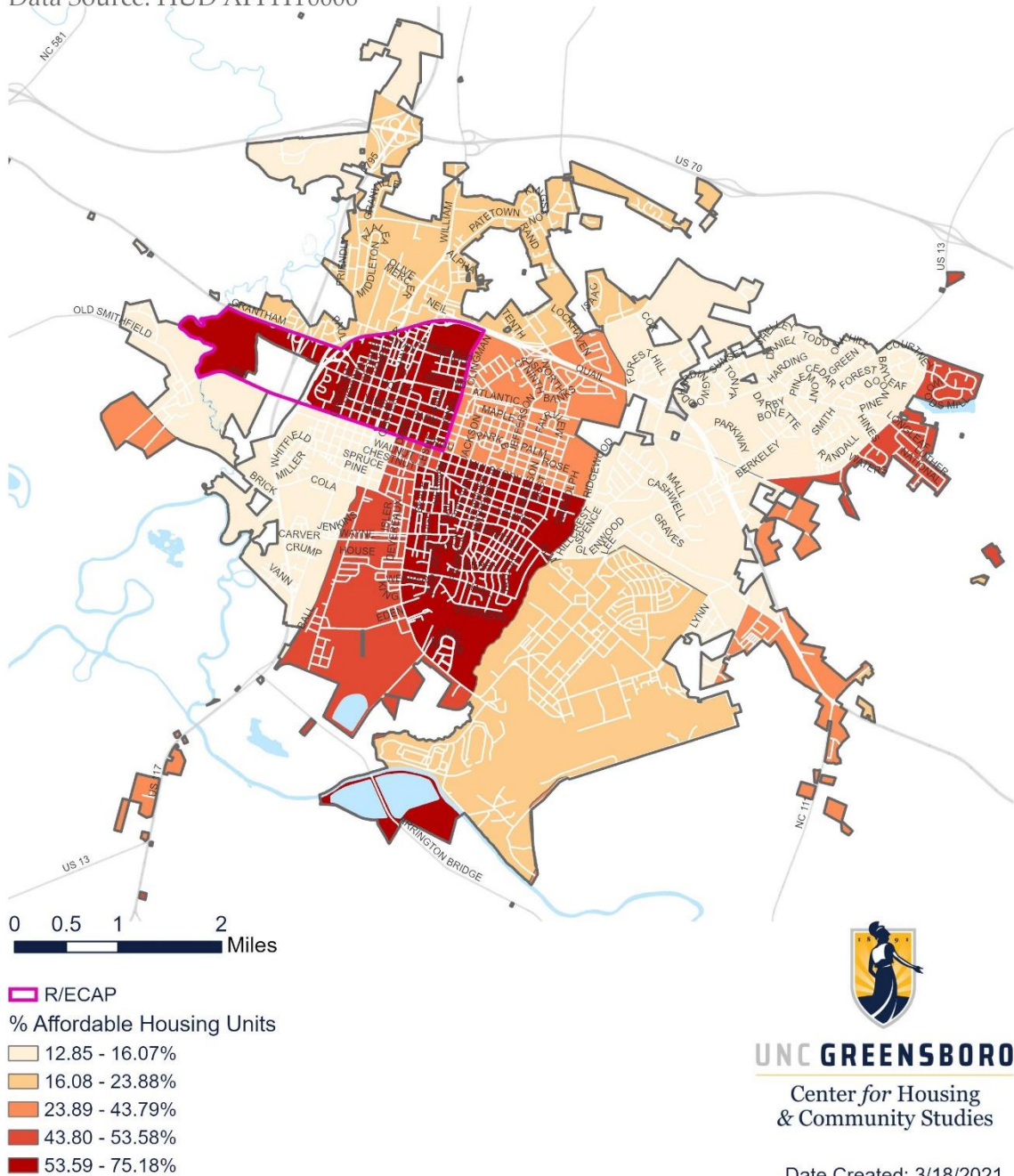
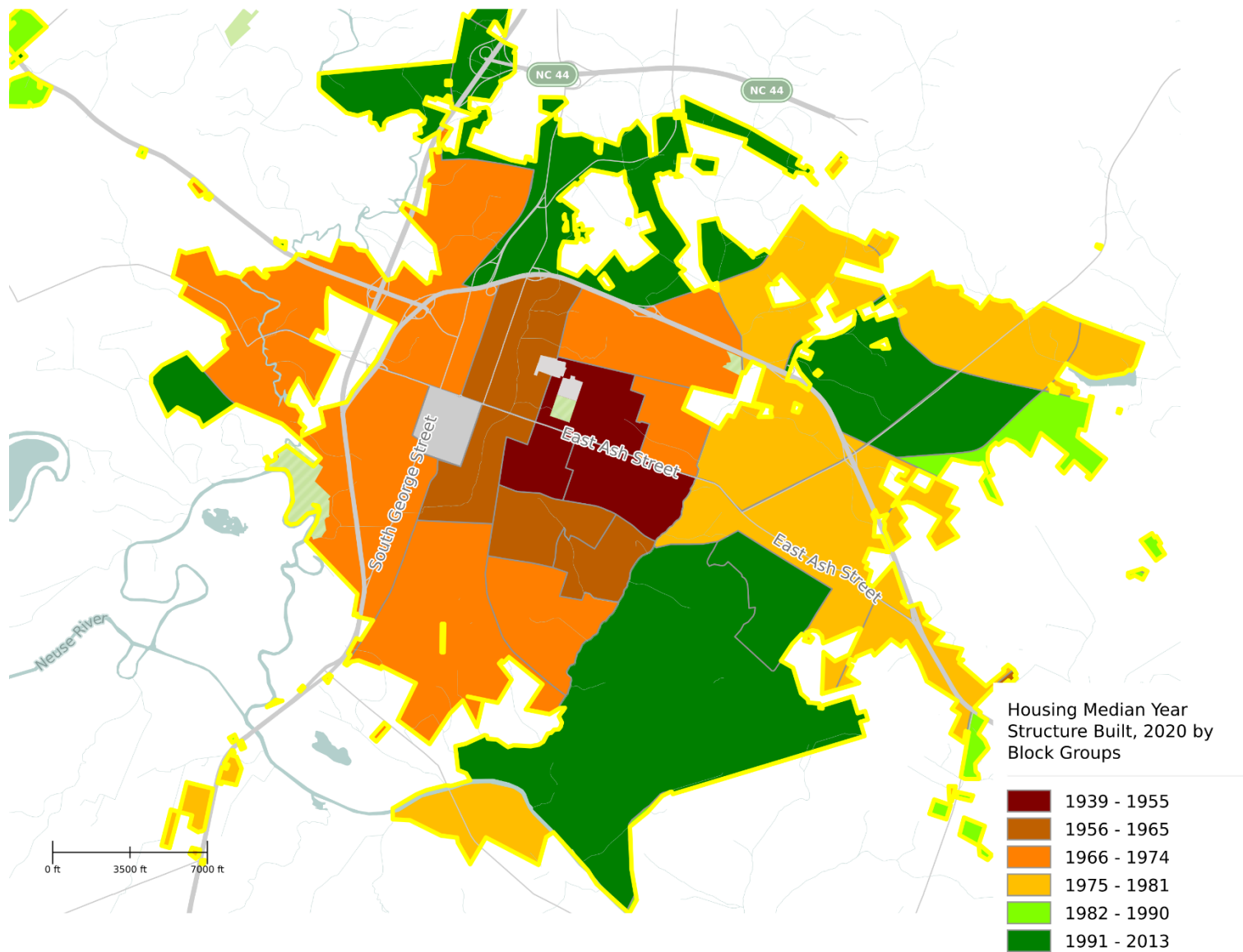


Figure 12 – Affordable Housing Units 2020 (AFFHT0006)



**Figure 13 – Median Age of Housing (ACS 2020)**



## **Vacant Property**

An estimated 12.4% of housing units in Goldsboro are vacant (ACS 2015-2019). Postal vacancy shows short-term vacancy trends based on addresses where mail has not been collected for over 90 days. Data from Valassis Lists tracks vacancy on a quarterly basis. In the 3<sup>rd</sup> quarter of 2020, the overall vacancy rate in this area was 9.08% down slightly from 9.48% in the 2<sup>nd</sup> quarter. Residential vacancy was 8.13% while business vacancy was 15.4%. These rates are significantly higher than the overall vacancy rates for Wayne County (3.55% in the 3<sup>rd</sup> quarter).

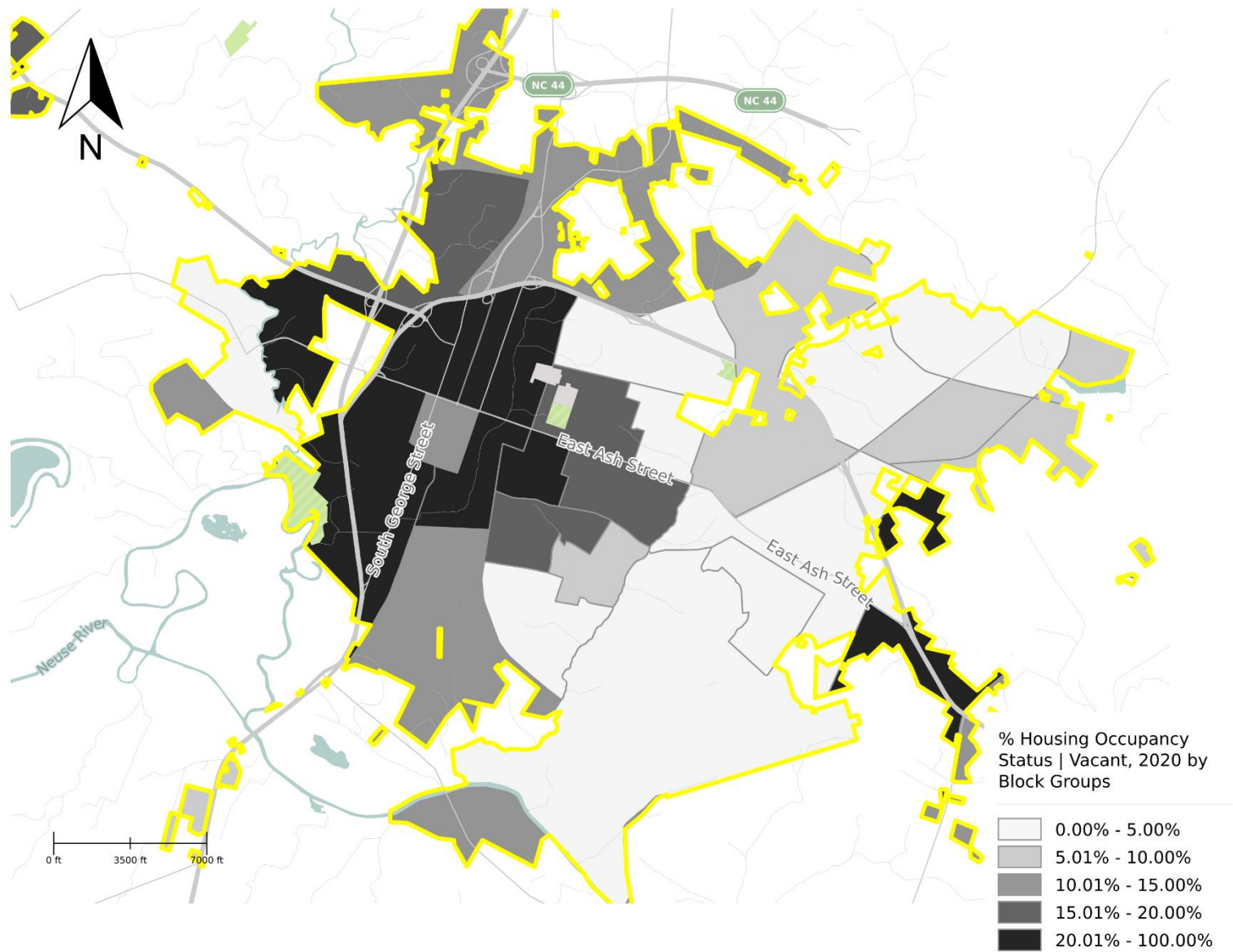
Vacancy has previously been recognized as an issue in Goldsboro in Analysis of Impediments and other housing reports. A housing unit is vacant if no one is living in it at the time of enumeration, unless occupants are temporarily absent. While the existence of vacant and abandoned properties is often indicative of economic distress and disinvestment in a neighborhood, these properties must also be approached as more than just a symptom of these forces. Property vacancy is also a cause of disinvestment. Once there are a few

vacant and abandoned properties in a neighborhood, a cycle of disinvestment and decline sets in (Accordino and Johnson 2000). This makes it vitally important to target investment and redevelopment efforts in areas with high concentrations of such properties.

By definition, distressed properties present the surrounding communities with a variety of problems that have been divided into three general categories. The first way in which these problems manifest is through the costs to communities. The presence of vacant properties tends to correlate with an increase in crime rates. Vacant and abandoned properties have been demonstrated to have a higher correlation to incidences of crime than any of the other variables tested (National Vacant Properties Campaign, 2005). Arson and accidental fires are highly associated with vacant and abandoned properties (Ahrens 2009).

The second set of problems associated with vacant and abandoned properties has to do with property values and tax revenues. Close proximity to vacant or abandoned properties can substantially decrease property values of other buildings. Another study found that





**Figure 14 - Vacant Housing by Block Group (ACS 2020)**

the average value of homes that were located within 150 feet of a vacant home in some cases decreased by over \$7,000. Vacant and abandoned properties also present a loss in tax revenues to cities. In a study comparing rehabilitated properties, un-renovated occupied properties, and vacant lots, a rehabilitated property could bring in twice the tax revenue of an un-renovated property and more than eleven times the tax revenue of a vacant lot (Goetz, Cooper, Thiele, and Lam 1998).

The third category of problems is in the indirect costs to homeowners that are not easily measured. Homeowners who live in close proximity to vacant or abandoned properties often face higher insurance premiums because vacant properties may be considered by insurance companies as hazardous liabilities. Homeowners surrounded by vacant properties also report a lower quality of life that may manifest in many ways, such as social fragmentation, isolation, and loss of aesthetic appeal. Childhood asthma, lead exposure, and cancers have also been shown to be possible negative effects of living in proximity to vacant lots, boarded homes, and high-

density traffic areas, and in substandard housing.

## **Home Ownership**

An estimated 37.3% or 5,371 households owned their homes. Nearly half of non-Hispanic white households (47.5%) were homeowners compared with a third (31.2%) of African American households, a quarter (25.7%) of Hispanic households and 32.0% of Asian households. One in four (25.0%) of homeowners were cost burdened. Cost burden homeowners were more likely to be over 65 years of age (27.8%) and/or making less than \$20,000 (79.3%).

Median sales price of single family, two to four unit multifamily, condominium and cooperative housing was \$85,000 in Goldsboro and \$125,000 in Wayne County in 2017 (Zillow Transaction and Assessment Dataset 2017). As a result of the current low interest rates, low inventory, and high demand resulting from the COVID19 pandemic, the median list price on the MLS is currently \$174,000 in the greater Goldsboro market and median sold home price is \$165,000 at 100 days on the market.

**Table 13 -Homeowners by Race/Ethnicity (ACS 2015-2019)**

<b>Race/Ethnicity</b>	<b>#</b>	<b>%</b>
<b>White, Non-Hispanic</b>	2,734	47.5%
<b>Black, Non-Hispanic</b>	2,471	31.2%
<b>Hispanic</b>	158	25.7%
<b>Asian or Pacific Islander, Non-Hispanic</b>	91	32.0%

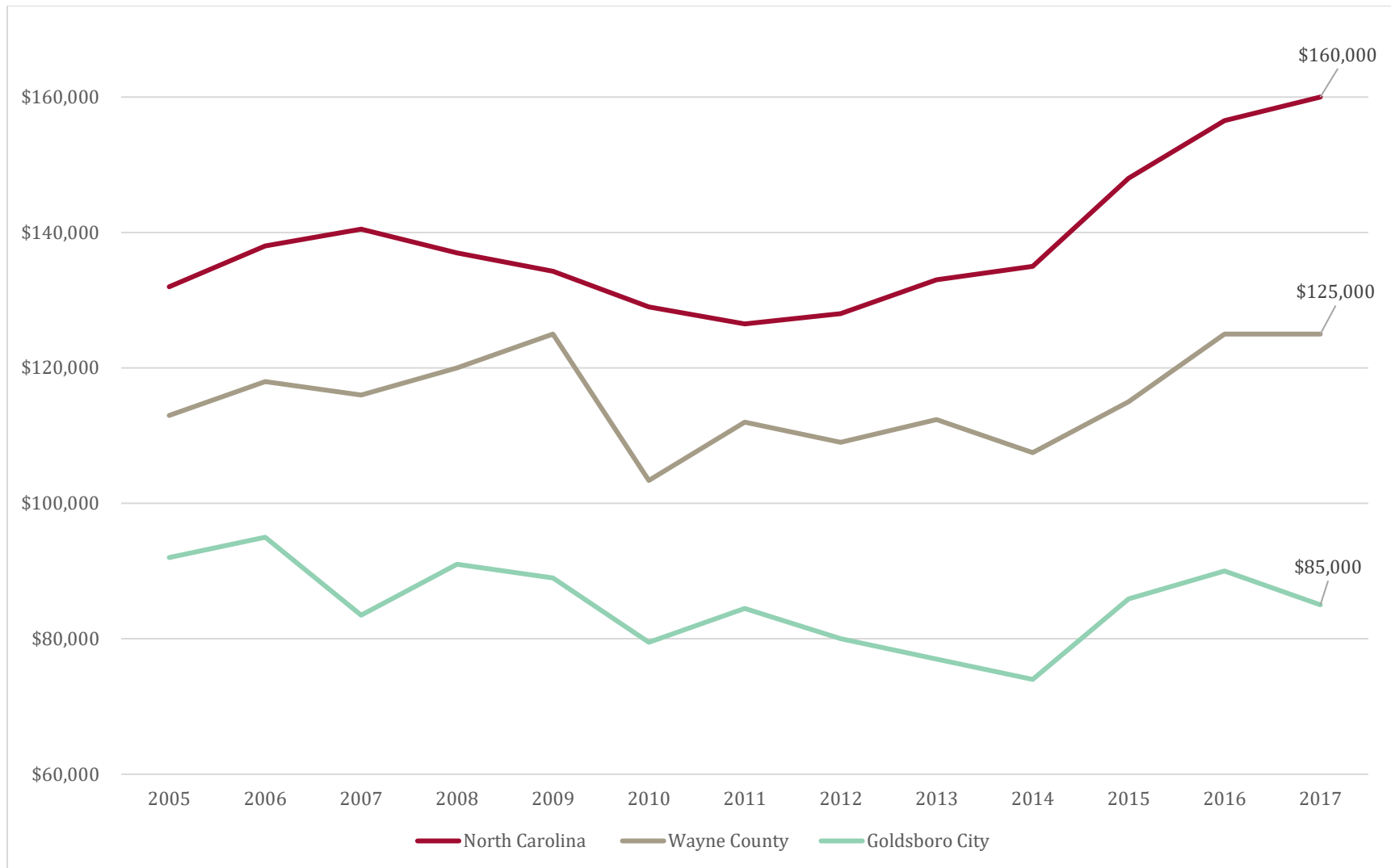
**Table 14 -Cost Burdened Homeowner by Age and Income (ACS 2015-2019)**

<b>Burdens by Age</b>	<b>#</b>	<b>% of owners who are cost burdened</b>
<b>Under 65</b>	629	22.4%
<b>65 or older</b>	713	27.8%
<b>Burdens by Annual Income</b>	<b>#</b>	<b>% of owners who are cost burdened</b>
<b>Less than \$20,000</b>	551	79.3%
<b>Less than \$50,000</b>	1,240	47.5%
<b>Less than \$75,000</b>	1,333	36.5%

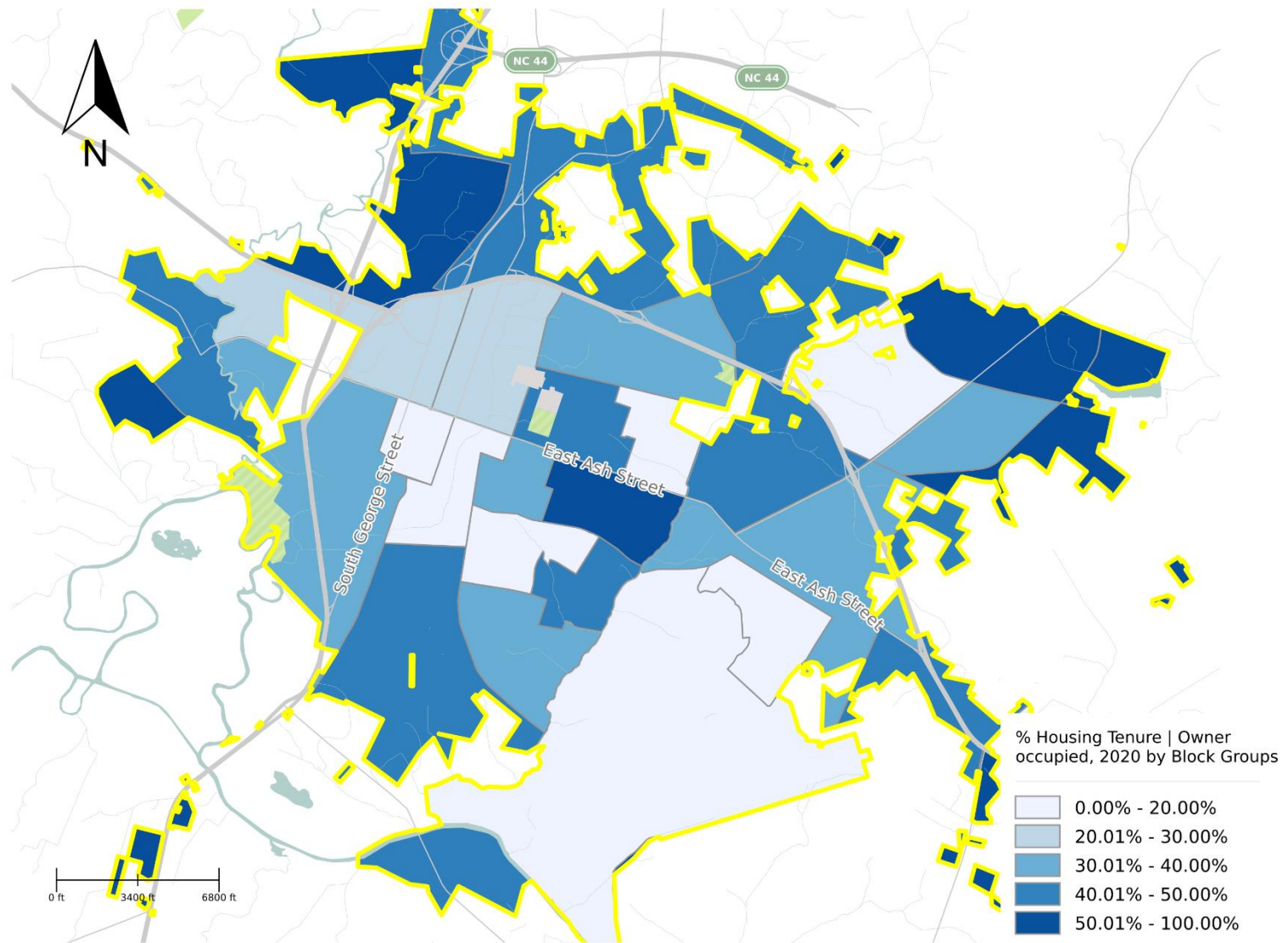
	<b>July-October 2020</b>	<b>April -June 2020</b>	<b>January -March 2020</b>
<b>Total New Listings During This Time Frame</b>	601	409	453
<b>Median Sold Price</b>	\$187,900	\$184,950	\$165,000
<b>Average Sold Price</b>	\$188,689	\$184,649	\$164,327
<b>Average Days on Market</b>	94	104	100
<b>Total Sold Dollar Volume</b>	\$109,251,218	\$69,428,102	\$60,307,840

**Figure 15 - Recent Sales Volume**

Source: Goldsboro Wayne County Association of REALTORS®

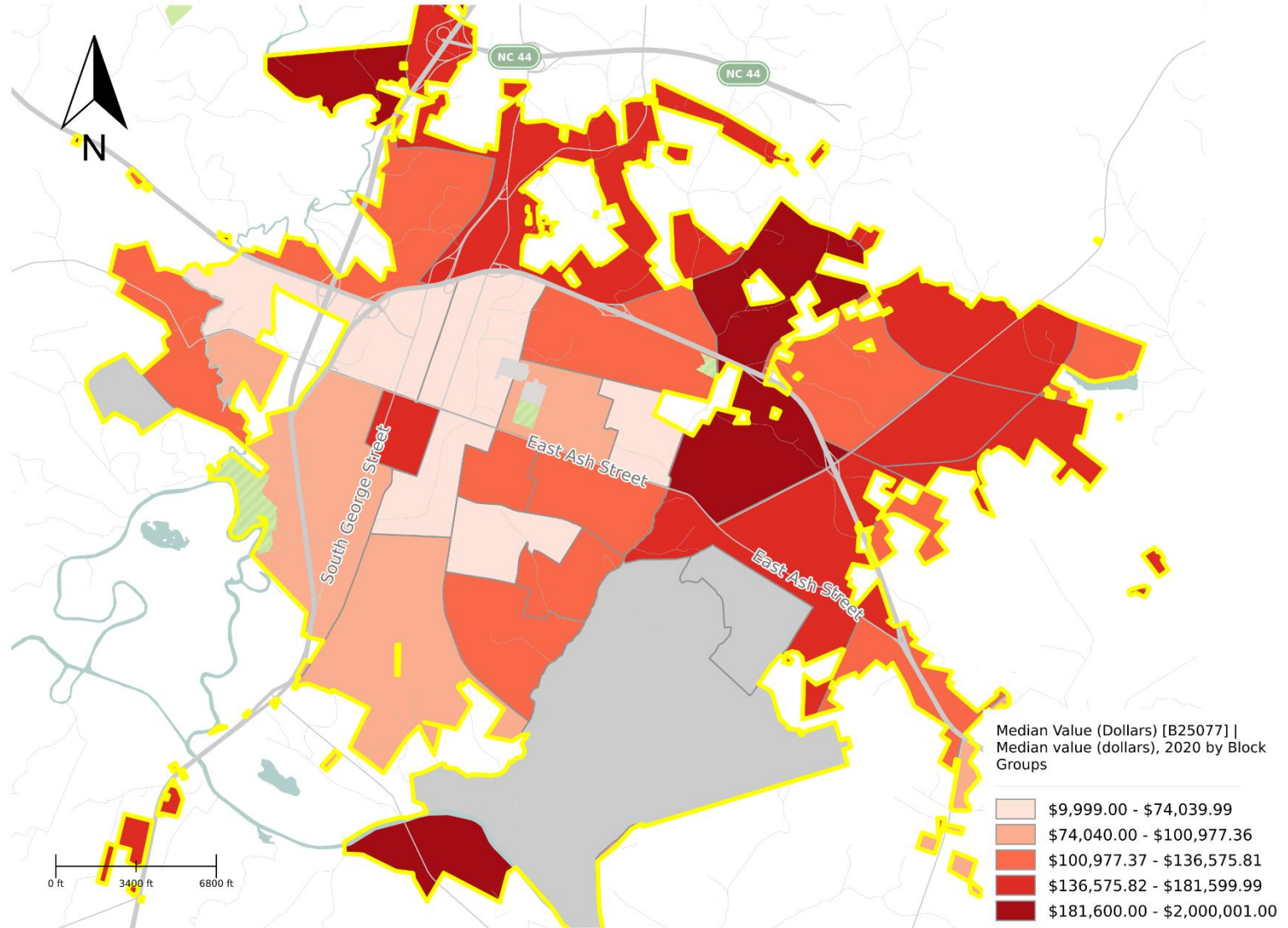


**Figure 16 - Median Sales Price 2005-2017; Source PolicyMap & Zillow**



**Figure 17 – Owner Occupancy (ACS 2020)**





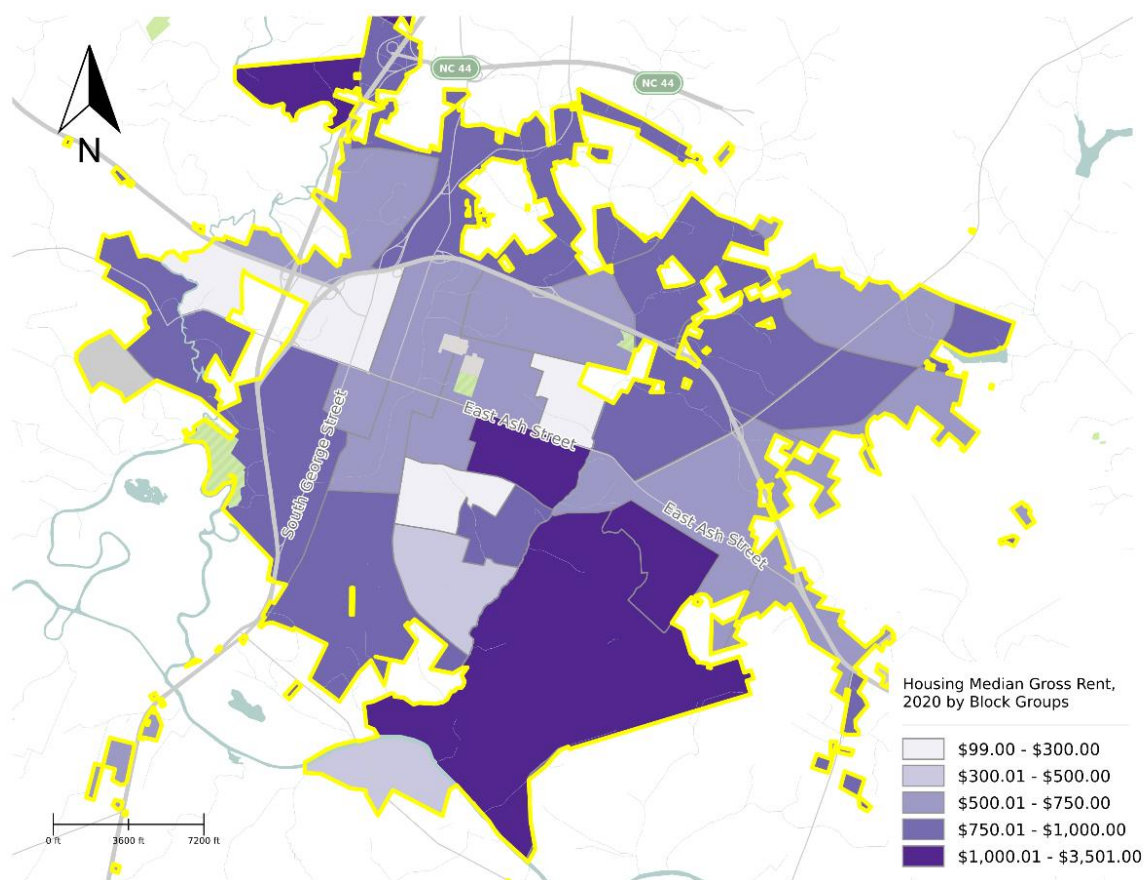
**Figure 18 – Median Housing Value (ACS 2020)**

## Rental Characteristics

A little less than two-thirds 62.7% (or 9,033 households) rented their homes in the City of Goldsboro. Just over half of non-Hispanic white households (52.5%) were renters compared with a two-thirds (68.8%) of African American households, three-quarters (74.2%) of Hispanic households and 68.0% of Asian households.

Typical (median) gross rent for rental units with cash rent in this area was \$791 (ACS 2015-2019). About 3.3% of all units fall

below \$300 and 13.2% of the rental stock is below \$500. Half of all units are over \$750 a month. While incomes are very low in the city, rents are disproportionately high leading to the high rate of cost burden. Nearly half of renters (47.1% or 4,256) were cost burdened paying more than 30% of their income towards rent. This is due in part to low wages and high poverty. Of cost burdened renters, 22.7% were over the age of 65. Additionally, 59.1% of cost burdened renters earned less than \$20,000 (ACS 2015-2019).



**Figure 19 – Median Gross Rent (ACS 2020)**



**Table 15 - Renters by Race/Ethnicity (ACS 2015-2019)**

<b>Race/Ethnicity</b>	<b>#</b>	<b>%</b>
<b>White, Non-Hispanic</b>	3,025	52.5%
<b>Black, Non-Hispanic</b>	5,446	68.8%
<b>Hispanic</b>	455	74.2%
<b>Asian or Pacific Islander, Non-Hispanic</b>	193	68.0%

**Table 16 -Rental Units by Size (ACS 2015-2019)**

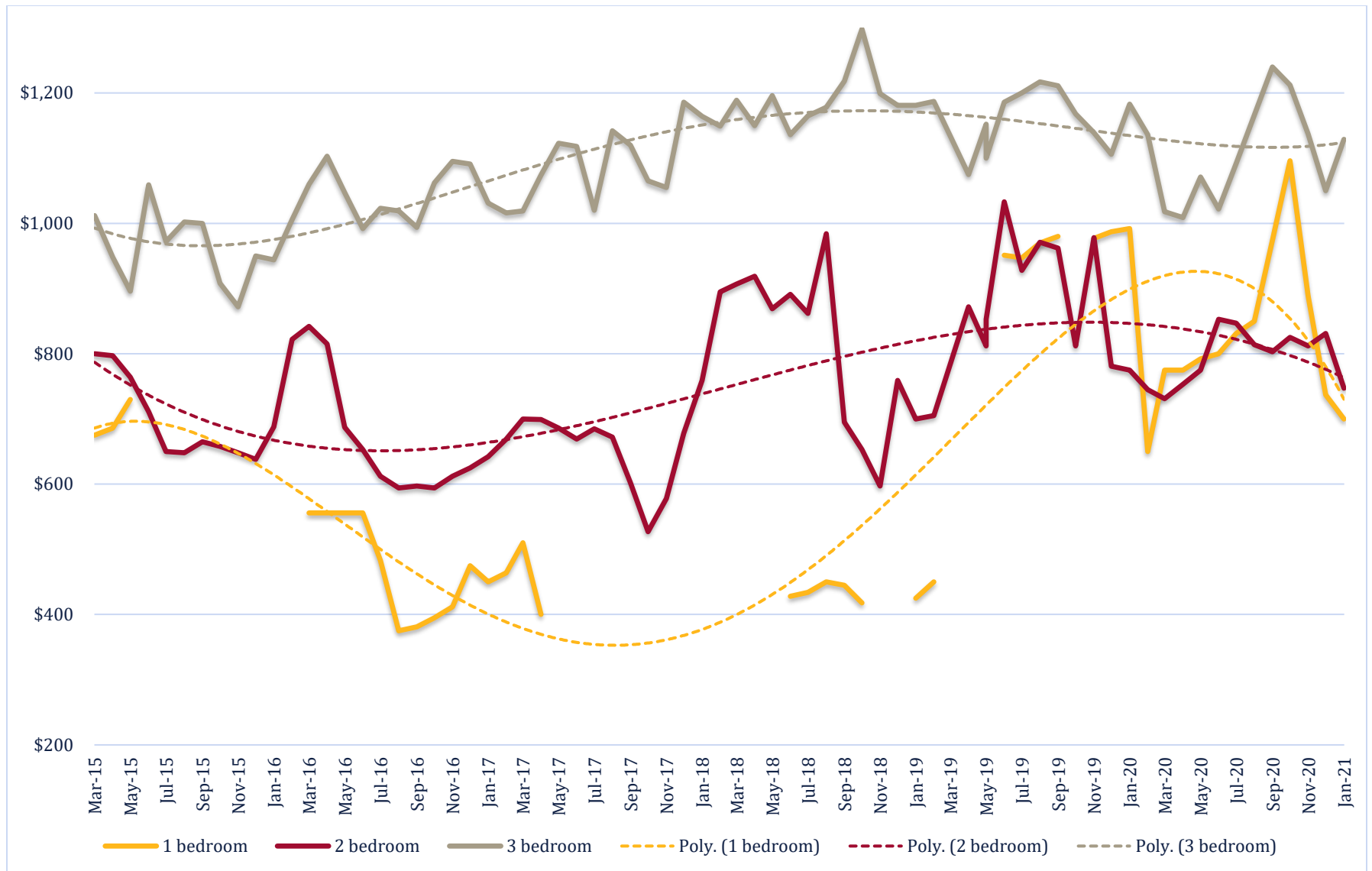
<b>Rental Units by Size</b>	<b>Number of Units</b>	<b>Percent of All Rental Units</b>
<b>0 or 1 Bedroom</b>	1,435	16.83%
<b>2 Bedrooms</b>	3,937	46.18%
<b>3 or more Bedrooms</b>	3,154	36.99%
<b>All</b>	8,526	100%

**Table 17 - Gross Rent by Inventory(ACS 2015-2019)**

<b>City of Goldsboro</b>	<b>Number of Units</b>		
	<b>0 or 1 Bedroom Units</b>	<b>2 Bedroom Units</b>	<b>3 or more Bedroom Units</b>
<b>&lt; \$300 / month</b>	566	343	189
<b>&lt; \$500 / month</b>	1,647	1,798	1,003
<b>&lt; \$750 / month</b>	2,218	5,682	3,554
<b>&lt; \$1,000 / month</b>	2,374	6,639	5,671
<b>&gt; \$1,000 / month</b>	64	283	1,597

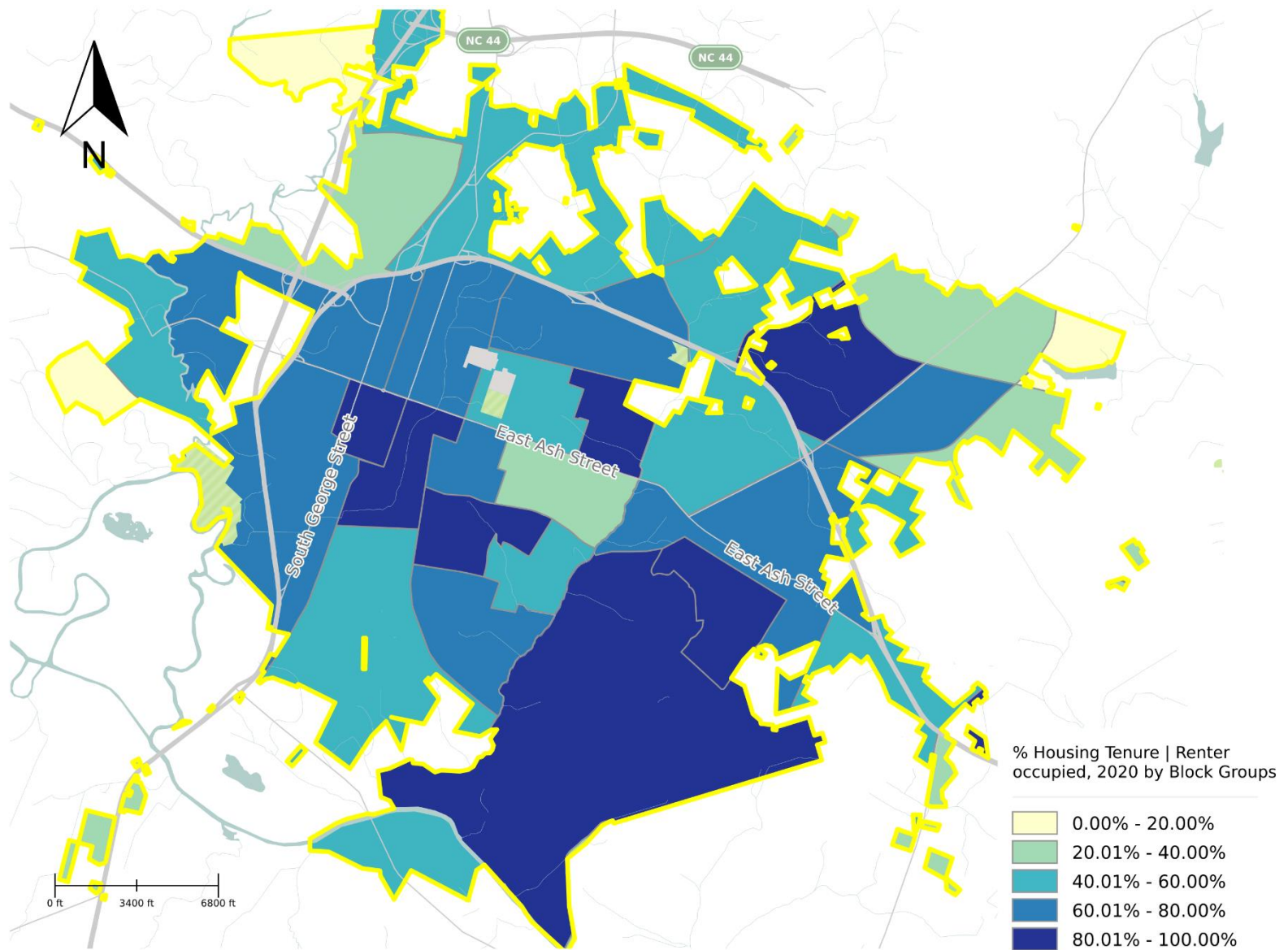
**Table 18 -Cost Burdened Renters by Age and Income**

<b>Burdens by Age</b>	<b>#</b>	<b>% of all cost burdened renters</b>
<b>Under 65</b>	3,290	77.30%
<b>65 or older</b>	966	22.70%
<b>Burdens by Annual Income</b>	<b>#</b>	<b>% of all cost burdened renters</b>
<b>Less than \$20,000</b>	2,516	59.12%
<b>Less than \$50,000</b>	4,145	97.39%
<b>Less than \$75,000</b>	4,256	100%



**Figure 20 – Advertised Rents in Apartments (Zumper Rental Research 2021)**

\*limited data for 1 bedroom as there is no or low advertised inventory some months



**Figure 21 - Renter Occupied Housing (ACS 2020)**

## IMPACT OF FLOODING

According to Wayne County Government, “Floods are a fact of life in all parts of Wayne County. A detailed analysis of flood hazards has been completed for most Wayne County rivers, creeks and streams. All streams in Wayne County are subject to flooding.”<sup>10</sup> Most notably, in 2016, Hurricane Matthew in 2016 and Hurricane Florence in 2018 as well as many previous storms small and large have led to damaged homes from flash floods and general flooding. Mathew alone damaged or destroyed 6,695 houses in Wayne County.<sup>11</sup> The County of Wayne North Carolina Multi-Jurisdiction Hazard Mitigation Plan details, “the number of structures within the City of Goldsboro’s jurisdiction that continue to be reported as repetitive loss structures due to flooding is nineteen (19). Eighteen of these structures are residential and one is a large commercial

structure. The tax value of these structures and land is \$ 1,591,350. The structures alone are valued at \$ 1,286,150. The commercial structure makes up approximately one third of this value.”<sup>12</sup>

Following Hurricane Florence, Governor Cooper established the North Carolina Office of Recovery and Resiliency (NCORR) to oversee funding from the U.S. Department of Housing and Urban Development (HUD) and from NC State Disaster Recovery Acts of 2017 and 2018, and the Storm Recovery Act of 2019 to assist local governments with disaster recovery in especially in Eastern North Carolina. ReBuild NC designated two areas in South Goldsboro as ‘buyout zones.’ More than 218 rental parcels were lost from the local market as a result of lying in flood prone areas.

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<sup>10</sup>[www.waynegov.com/DocumentCenter/View/2948/brochure6?bidId=](http://www.waynegov.com/DocumentCenter/View/2948/brochure6?bidId=)

<sup>11</sup>[files.nc.gov/rebuildnc/documents/matthew/rebuildnc\\_wayne\\_plan\\_combined.pdf](http://files.nc.gov/rebuildnc/documents/matthew/rebuildnc_wayne_plan_combined.pdf)

<sup>12</sup> [fremontnc.gov/wp-content/uploads/2019/02/Hazard-Mitigation-Plan-PDF.pdf](http://fremontnc.gov/wp-content/uploads/2019/02/Hazard-Mitigation-Plan-PDF.pdf)





# SEYMOUR JOHNSON AIR FORCE BASE

The Seymour Johnson Air Force Base was originally activated in 1942, deactivated in the post WWII period and reactivate in 1956. The United States Air Force 4th Fighter Wing is stationed at the base. There are 530 active-duty officers and 3,800 enlisted service members and their families stationed at the Base. More than 1,000 civilian and contractors are employed by the base.

In 1996, President Clinton authorized the National Defense Authorization Act which included the Military Housing Privatization Initiative (MHPI). The MHPI was meant to address problems concerning housing for military Service members and their families: (1) the poor condition of DoD owned housing, and (2) a shortage of quality affordable private housing. DoD was authorized to work with the private sector to remedy these issues and to provide service members with a Basic Allowance where they can choose to live in private sector housing or privatized on-base housing.

At Seymour Johnson, unaccompanied or single airmen of the rank between E1-E4 with less than 3 years of service are provided private accommodations in the barracks. However, between 2011-2015 dormitory renovations may have created some shortage of housing at Seymour Johnson. Reports of issues with base housing persisted in media reports in 2019.<sup>13</sup> Unaccompanied Airmen in the rank of E-4 or greater with greater than 3 years of service are housed in the local community with assistance from their basic allowance. On-base family rental housing is provided to enlisted and officers by Corvias, a partner to the U.S. military for the construction and management of on-base housing. Corvias manages 686 homes and has recently renovated 480 of these homes.<sup>14</sup> These homes include utilities, lawn care, trash & recycling, 24-hour maintenance included

The Military Housing Office (MHO) provides all personnel assistance in locating housing in the local community. For those military personnel who choose to live off-base, the

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<sup>13</sup> <https://www.airforcetimes.com/news/your-air-force/2019/07/10/seymour-johnson-afb-pledges-to-fix-dismal-housing-after-photos-surface/>

<sup>14</sup> <http://airforce.corviasmilitaryliving.com/renovationsj>

basic allowance in the Goldsboro areas for housing is assigned by rank and ranges from \$1,098 for an E1 ranked enlisted person with no dependents to \$1,890 for O7 with dependents.<sup>15</sup> BAH rates can be used to rent or purchase a home. It operates a database of available rental listings. As of April 2021, there were 43 units available on this system ranging from a \$450/month one-bedroom

unit to a \$1,695/ month four-bedroom, three bath home.

With more than 3,000 airmen and their families living off-base, Seymour Johnson Air Force Base may impact the availability of housing in the Goldsboro area. It is possible that the generous housing stipend received by off-base personnel may inflate local prices and decrease affordable housing supply.



**Figure 23 - Example Duplex for Rank E1-E6 with Dependents**

<sup>15</sup> <https://www.defensetravel.dod.mil/site/bahCalc.cfm>



# MORTGAGE ACTIVITY & FAIR LENDING

## Loan Application Characteristics

The following section describes the loan characteristics for applications filed in the City of Goldsboro in 2018 as well as the general characteristics of the lending institutions. According to the 2018 HMDA data file, there were 3,591 loan applications in the City of Goldsboro. Most were for conventional loans (52.3% or 1,878 applications), followed by loan applications for Department of Veteran's Affairs (VA) loans (31.4%, 1,128 applications), Federal Housing Administration (FHA) loans (13.8% or 494 applications), and finally 91 applications (2.5%) for Rural Housing Loans (RHS) or Farm Service Agency (FSA) loans.

## Property Type

In 2018, 91.3% (3,277) applications were for loans on one to four family properties on site-built, with only a small number of loan applications were on manufactured (8.5% or 304 applications). Multifamily on manufactured and site-built altogether (0.3% or 10 applications) only occupied less than one percent of the total loan applications.

## Purpose of Loan

More than half of loan applications (54.5% or 1,957 applications) were for home purchase. Refinancing and cash-out refinancing accounted for 15.5% (555) of applications and 14.5% (520) of applications respectively. Home improvement loans accounted for a small portion (5.3% or 189 applications) of the total applications.

*Table 19 - Type of Loan*

Loan Type	Percent
Conventional	52.3
FHA	13.8
VA	31.4
RHS or FSA	2.5
Total	100.0
N	3,591

*Table 20 - Property Type*

Property Type	%
Multifamily: Manufactured	0.0
Multifamily: Site-Built	0.3
Single Family: Manufactured	8.5
Single Family: Site-Built	91.3
Total	100.0
N	3,591

*Table 21 - Purpose of Loan*

Loan Purpose	Percent
Home purchase	54.5
Home improvement	5.3
Other purpose	6.8
Not applicable	3.5
Refinancing	15.5
Cash-out refinancing	14.5
Total	100.0
N	3,591

### **Occupancy Type**

Most loan applications were for a principal residence (93.8% or 3,369 applications). About five percent of the applications were targeted for investment properties (4.5% or 163 applications). Less than two percent (1.6% or 56 applications) were for a second residence.

### **Amount of Loan**

The loan amount requested on applications ranged from a minimum of \$5,000 to a maximum of \$21,000,000. The average loan application was for \$140,156 (mean). Average loan requests varied by the purpose of the loan: \$155,782 (mean) for the purchase of a home, \$53,836 (mean) for the

improvement of a home, \$154,072 (mean) for refinancing purpose, and \$145,385 (mean) for the purpose of cash-out refinancing. Logically, loan amounts were associated with the income of the applicant.

**Table 22 - Owner Occupancy**

Occupancy	Percent
Principal residence	93.8
Second residence	1.6
Investment property	4.5
Total	100.0
N	3,591

**Table 23 - Loan Amount**

Amount	2018
Mean	\$140,156
Median	\$125,000
Minimum	\$5,000
Maximum	\$21,000,000
N	3,591

**Table 24 - Loan Amount**

		Income	Loan to Income Ratio
Amount (000s)	Pearson Correlation <sup>16</sup>	.198**	.222**
	Sig. (2-tailed)	.000	.000
	N	3078	3078
Loan to Income Ratio	Pearson Correlation	-.163**	1
	Sig. (2-tailed)	.000	
	N	3078	3078

\*\* . Correlation is significant at the 0.01 level (2-tailed).

<sup>16</sup> The Pearson Correlation assesses the degree of relationship between two continuous variables which suggesting the strength of the relationship. The strength varies from -1 (perfect negative linear relationship) to +1 (perfect positive linear relationship), with 0 as no relationship.

**Table 25 - Crosstabulation of Approval vs. Pre-Approval Request (2018)**

2018 HMDA Data	Not Approved	Approved
Pre-approval requested	3.0% 2	97.0% 64
Pre-approval not requested	31.9% 1,126	68.1% 2,399
Total	31.4% 1,128	68.6% 2,463

**Pre-approval**

In 2018, only 1.8% of cases (66 of the 3,591 applications) requested pre-approval. Most cases (98.2% or 3,525 applications) did not request pre-approval. Approval rates were found to be associated with pre-approval requests. Of those requesting pre-approval in 2018, 97.0% were approved as compared with 68.1% of those who did not request pre-approval. This may be an area for improvement, especially in working with down payment assistance program participants.

**Table 26 - Pre-approval**

Pre-approval Status	Percent
Pre-approval requested	1.8
Pre-approval not requested	98.2
Total	100.0
N	3,591

**Loan Action**

In accordance with the reporting convention of other Fair Housing agencies (1997), the variable “Loan Action” of the Loan Application Register (LAR) data originally coded as “Loan originated” (53.7%), “Application approved but not accepted” (2.1%), or “Purchased loan” (12.8%) were recoded as “Approved” for this analysis. About two-thirds of the loan applications were approved (68.6% or 2,463 applications). Those applications coded as “Application denied” (16.6%), “Application withdrawn by applicant” (10.7%), “File closed for incompleteness” (4.1%), “Preapproval request denied” (.0%), or “Preapproval request approved but not accepted” (.0%) were recoded as “Not Approved (Denied, Withdrawn, or Incomplete)” and represented about a third of applications (31.4% or 1,128 applications).

**Table 27 - Loan Action 2018**

Action	Percent
Loan originated	53.7
Application approved but not accepted	2.1
Application denied	16.6
Application withdrawn by applicant	10.7
File closed for incompleteness	4.1
Purchased loan	12.8
Preapproval request denied	0.0 (n=1)
Preapproval request approved but not accepted	0.0 (n=1)
Total	100
N	3,591

**Table 28 - Loan Approval 2018**

Approved	Percent
Not approved (Denied, Withdrawn, or Incomplete)	31.3
Approved	68.6
Total	100.0
N	3,591

### ***Mortgage Brokers and Lending Institutions***

There were 215 institutions in the City of Goldsboro from which LAR data was received. There was a wide range in the number of applications from these institutions. More than a quarter (27.9% or 60 institutions) reported only one application and almost half of them (49.8% or 107 institutions) had fewer than ten applications. Conversely, the fifteen largest institutions (in terms of number of applications) accounted for half of all applications (66.4% or 2,384 applications). On average, institutions submitted 16.7 loan

applications with a range from 1 to 471 applications.

### **Applicant Information**

The Loan Application Register (LAR) includes the sex, race, ethnicity, and income of the applicants.

#### ***Sex***

The sex of the applicant was known in about 83.3% (2,990) of applications. More than a quarter of the primary applicants were female (25.7% or 922 applicants), and more than half (57.6% or 2,068 applicants) were male. 1,597 mortgage applications had a co-applicant, of whom 61.6% (984) were female.

**Table 29 - Sex of the Applicant**

Sex	Percent
Male	57.6
Female	25.7
Info not provided	5.1
Not Applicable	11.7
Total	100.0
N	3,591

**Table 30 - Sex of the Co-Applicant**

Sex	Percent
Male	5.7
Female	27.4
Info not provided	2.2
Not Applicable	9.2
No Co-applicant	55.5
Total	100.0
N	3,591

**Table 31 - Applicant Ethnicity**

Ethnicity	Percent
Hispanic	4.7
Non-Hispanic	75.5
Missing	19.9
Total	100.0
N	3,591

**Table 32 - Applicant Race/Ethnicity Recode**

Race	Percent	Valid Percent
American Indian	0.2	0.2
Asian	0.4	0.5
African American	17.5	21.4
Hispanic	4.7	5.7
Pacific Islander	0.1	0.1
Non-Hispanic White	57.3	70.2
Multiracial Non-Hispanic	1.5	1.8
Missing	18.5	-
Total	100.0	100.0
N	3,591	

### ***Race/Ethnicity***

The Loan Application Register records ethnicity as Hispanic or Non-Hispanic and race as American Indian or Alaska Native, Asian, Black or African American, Native Hawaiian or Other Pacific Islander, and White. This allows for multiple selections of up to five racial categories plus ethnicity for both the applicant and the co-applicant. Unfortunately, this system creates difficulties for analysis. In addition, about a one-in-five applications (18.5% or 663 applications) lacked race/ethnic information entirely. To facilitate analysis, race/ethnicity variables were collapsed and recoded into a single categorical variable. Hispanic ethnicity was treated as a unique race/ethnic identifier in any combination with race. All instances of multiple races (excluding combinations with Hispanic) were coded as “multiracial non-Hispanic.” More than two-thirds of all applications were by non-Hispanic white applicants (70.2%). African American applicants made up one fifth of applications (21.4%).

### ***Income***

Income data was available for 3,078 applications (85.7% of applications) and

ranged from \$820 to \$3,750,000 per annum.

The mean reported income in 2018 was \$74,670 and a median income of \$60,000. Notably income of applicants was above the median income of the City. Income was directly associated with other demographic characteristics of the applicants. For example, male primary applicants and a mean reported family income of \$81,300 while female primary applicants had a mean family income of only \$60,027. Similarly, variation existed between income and race/ethnicity. Multiracial applicants had a mean reported family income of \$106,769, followed by Non-Hispanic white applicants (\$79,552), American Indian applicants (\$72,429), Asian applicants (\$64,500), African American applicants (\$61,416), Pacific Islander applicants (\$61,000), and Hispanic applicants (\$59,825).

An ANOVA test of difference between groups was statistically significant ( $F=4.487$ ,  $df=6$ ,  $p<.001$ ). A Tukey’s Post Hoc Multiple Comparison Test demonstrated that the incomes of Non-Hispanic Whites and Multiracial applicants were significantly greater ( $p<.01$ ) than the incomes of African Americans.

**Table 33 - Reported Family Income 2018**

Amount	2018
Mean	\$74,670
Median	\$60,000
Minimum	\$820
Maximum	\$3,750,000
N	3,591

**Table 34 - Income by Race/Ethnicity 2018**

Race/Ethnicity (Recoded)	Mean Income
American Indian	\$72,429
Asian	\$64,500
African American	\$61,416
Hispanic	\$59,825
Pacific Islander	\$61,000
Non-Hispanic White	\$79,552
Multiracial Non-Hispanic	\$106,769

## Community Measures

In order to control for community characteristics, as well as to provide context for the applications, census data has been linked to each of the application records in the HMDA data set. The census tract population, percent minority, tract to MSA median family income percentage (a measure of relative wealth), number of owner-occupied units, and the number of 1 to 4 family units are provided for the tract in which the property is located.

## Loan Approval vs. Non-Approval

### *Approvals by Type & Purpose of Loan*

About two-thirds of all applications were approved (68.6%). However, approval rates varied by both the type of the loan and the purpose of the loan. RHS or FSA loans had highest approval rate (75.8%) then conventional, FHA, and VA (65.2%, 67.2%, and 74.3% respectively). There were 1,224 of the 1,878 conventional loan applications (65.2%) approved. Similarly, loan applications for the purpose of purchasing a home were more likely to be approved (78.7% approved) than for refinancing (60.4%



**Table 35 - Community Measures 2018**

	Minimum	Maximum	Mean
Population	957	8846	5763
Percent Minority	10.8%	90.2%	41.1%
Tract to MSA Income Percent	55.0%	152.0%	103.3%
Owner Occupied Units	132	2124	1438
One to Four Family Units	539	3388	2274
N=3,591			

**Table 36 - TOTAL POPULATION PER CENSUS BLOCK GROUP 2018**

		Income	Amount000s
Population	Pearson Correlation	-.006	0.027
	Sig. (2-tailed)	0.733	0.111
	N	3,078	3,591
Percent_Min	Pearson Correlation	-.020	-.047**
	Sig. (2-tailed)	0.270	0.000
	N	3,078	3,591
Tract_to_MSA_Income	Pearson Correlation	.063**	.088**
	Sig. (2-tailed)	0.000	0.000
	N	3,078	3,591
OwnerOCCunits	Pearson Correlation	.006	0.036*
	Sig. (2-tailed)	0.000	0.031
	N	3,078	3,591
One_to_four_famunits	Pearson Correlation	-.031	0.009
	Sig. (2-tailed)	0.083	0.597
	N	3,078	3,591

\*\* Correlation is significant at the 0.01 level (2-tailed).

\* Correlation is significant at the 0.05 level (2-tailed).

**Table 37 - Loan Type by Approval 2018**

Loan Type	Percent Approved
Conventional	65.2
FHA	67.2
VA	74.3
RHS or FSA	75.8
Total	68.6

approved) or improving a home (47.1% approved).

### ***Approval by Institution & Race/Ethnicity***

Twenty-nine companies served only non-white applicants. These institutions reported only between 1 and 4 applications each (43 applications total). Seventy-three institutions served only non-Hispanic white applicants, reporting between 1 and 13 applications each (144 applications total). Interestingly a large proportion of institutions had no data or missing data on race/ethnicity of the applications. For example, Quicken Loans (90 applications) had 66 applications missing race/ethnicity (73.3%), Freedom Mortgage Corporation (56 applications) had 42 missing on race/ethnicity (75.0%). A total of 7 of the 215 (3.3%) companies lacked complete race/ethnicity information on applicants. The following data presents the ten leading institutions in terms of greatest number of non-white applicants processed and their corresponding mortgage approval rates.

The overall approval rate for applications varied greatly between institutions. Over a

third of the institutions (35.3% or 76 institutions) had 100% approval of applications. Conversely, 30 institutions (14.0%) had 0% approval rates for applications. Of most interest to this study were the institutions with the greatest difference between White and non-White approval rates. Differences between the proportion of Whites and non-Whites were computed and then converted into a z-score<sup>17</sup>. These scores were then rank ordered from highest to lowest to see which institutions had the greatest difference between Whites and Non-Whites in the approval of loan applications (See Table 22). Difficulty in interpreting this data exists in that there is a great variation in the number of applications as well as the amount of missing race/ethnic data. For example, it is difficult to determine if the difference between White and non-White approval rates (36.7%) for Quicken Loans Inc. is noteworthy when nearly half of the race/ethnicity data were missing (42.3% or 66 out of 90 applications).

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<sup>17</sup> A measure of the distance in standard deviation of a score from the mean.

**Table 38 - Leading Institutions Serving Non-White Applicants 2018**

Institution	White Applicants	Non-White Applicants	Total Applicants	Non-White%	Overall Approval%	White Approved %	Non-white Approved%	Difference in White/Non-White Approvals
STATE EMPLOYEES'	324	127	451	28.2%	70.9%	54.3%	18.0%	36.4%
BRANCH BANKING AND TRUST COMPANY	306	42	348	12.1%	73.2%	67.0%	6.0%	60.9%
WELLS FARGO BANK	257	67	324	20.7%	79.3%	62.7%	11.1%	51.5%
ON Q FINANCIAL, INC.	106	27	133	20.3%	83.5%	66.9%	17.3%	49.6%
MOVEMENT MORTGAGE, LLC	96	23	119	19.3%	86.0%	68.9%	16.8%	52.1%
QUICKEN LOANS INC.	66	24	90	26.7%	66.0%	51.1%	14.4%	36.7%
FIRST-CITIZENS BANK & TRUST COMPANY	67	22	89	24.7%	68.6%	57.3%	10.1%	47.2%
USAA FEDERAL SAVINGS BANK	65	8	73	11.0%	63.9%	60.3%	8.2%	52.1%
MORTGAGE RESEARCH CENTER, LLC	45	22	67	32.8%	69.0%	50.7%	17.9%	32.8%
NEW DAY FINANCIAL, LLC	26	41	67	61.2%	19.1%	9.0%	10.4%	-1.5%

**Table 39 - Comparisons of Approval Rates Whites vs. Non-Whites 2018**

Institution	Total Applicants	Overall Approval Rate	White Approval Rate	Non-White Approval Rate	Difference in White/Non-White Approvals	Zscore: Difference in White/Non-White Approvals
CORPORATE INVESTORS MORTGAGE GROUP, INC.	3	100.0%	100.0%	0.0%	100.0%	1.31
GUARANTY TRUST COMPANY	4	100.0%	100.0%	0.0%	100.0%	1.31
REGIONS BANK	20	90.9%	95.0%	0.0%	95.0%	1.20
SOUTHERN BANK AND TRUST COMPANY	64	84.3%	78.1%	4.7%	73.4%	0.75
BRANCH BANKING AND TRUST COMPANY	348	73.2%	67.0%	6.0%	60.9%	0.49
MOVEMENT MORTGAGE, LLC	119	86.0%	68.9%	16.8%	52.1%	0.30
USAA FEDERAL SAVINGS BANK	73	63.9%	60.3%	8.2%	52.1%	0.30
WELLS FARGO BANK	324	79.3%	62.7%	11.1%	51.5%	0.29
ON Q FINANCIAL, INC.	133	83.5%	66.9%	17.3%	49.6%	0.25
FIRST-CITIZENS BANK & TRUST COMPANY	89	68.6%	57.3%	10.1%	47.2%	0.20
LOANDEPOT.COM, LLC	36	51.2%	47.2%	5.6%	41.7%	0.09
QUICKEN LOANS INC.	90	66.0%	51.1%	14.4%	36.7%	-0.02
STATE EMPLOYEES'	451	70.9%	54.3%	18.0%	36.4%	-0.03
21ST MORTGAGE CORPORATION	39	40.9%	41.0%	5.1%	35.9%	-0.04
MORTGAGE RESEARCH CENTER, LLC	67	69.0%	50.7%	17.9%	32.8%	-0.10
NAVY FEDERAL CREDIT UNION	51	61.4%	47.1%	17.6%	29.4%	-0.17
VANDERBILT MORTGAGE AND FINANCE, INC.	65	27.6%	16.9%	6.2%	10.8%	-0.56
CARRINGTON MORTGAGE SERVICES, LLC	20	65.2%	40.0%	30.0%	10.0%	-0.58

### ***Approvals by Applicant Characteristics***

Bivariate analysis of approval rates and reasons for denial based on the demographic characteristics of applicants were performed using SPSS. Reported are differences by sex, race/ethnicity, and income level.

#### ***Sex***

On average 66.9% of male applicants (n=1,384) and 61.6% female applicants (n=568) were approved for a loan. This difference of 5.3% was statistically significant (Pearson Chi-Square =233.869,  $df= 3$ ,  $p<.001$ ,  $\Phi=.242$ ,  $p<.001$ ). This disproportionate approval rate may be related to income differences noted between males and females (See Income).

Comparing males and females, it was found that denial reasons were fairly consistent with credit history being the leading reason for denial, followed by debt-to-income ratio, and then collateral.

#### ***Race/Ethnicity***

More than two-thirds (70.9%) of applications made by Non-Hispanic White primary applicants were approved. In comparison, only 49.7% of applications from Non-White primary applicants were

approved. This difference of 21.2% was statistically significant (Pearson Chi-Square =108.440,  $df= 2$ ,  $p<.001$ ,  $\Phi=.193$ ,  $p<.001$ ). Comparisons were made between each of the race/ethnicity groups. Asian had the highest approval rates (87.5%), followed by Non-Hispanic White (72.8%), Hispanic (57.5%), Pacific Islanders (50.0%), African American (49.1%), Multiracial Non-Hispanic (49.1%), and American Indian (14.3%).

An ANOVA test of difference between groups was statistically significant ( $F=31.702$ ,  $df=7$ ,  $p<.001$ ). A Tukey's Post Hoc Multiple Comparison Test demonstrated that only the approval rate of Non-Hispanic White was significantly greater ( $p<.01$ ) than African American, Hispanic, and Multiracial Non-Hispanic. While Asian approval rates were the highest, the low percentage (less than .5 %) of all applications rendered differences as statistically insignificant.

By race/ethnicity we see the reasons for denial is also consistent with credit history being the leading reason for denial, followed by debt-to-income ratio, and then collateral. Credit application incomplete was more likely for non-white applicants as was insufficient cash.

**Table 40 - Denial Reasons by Sex**

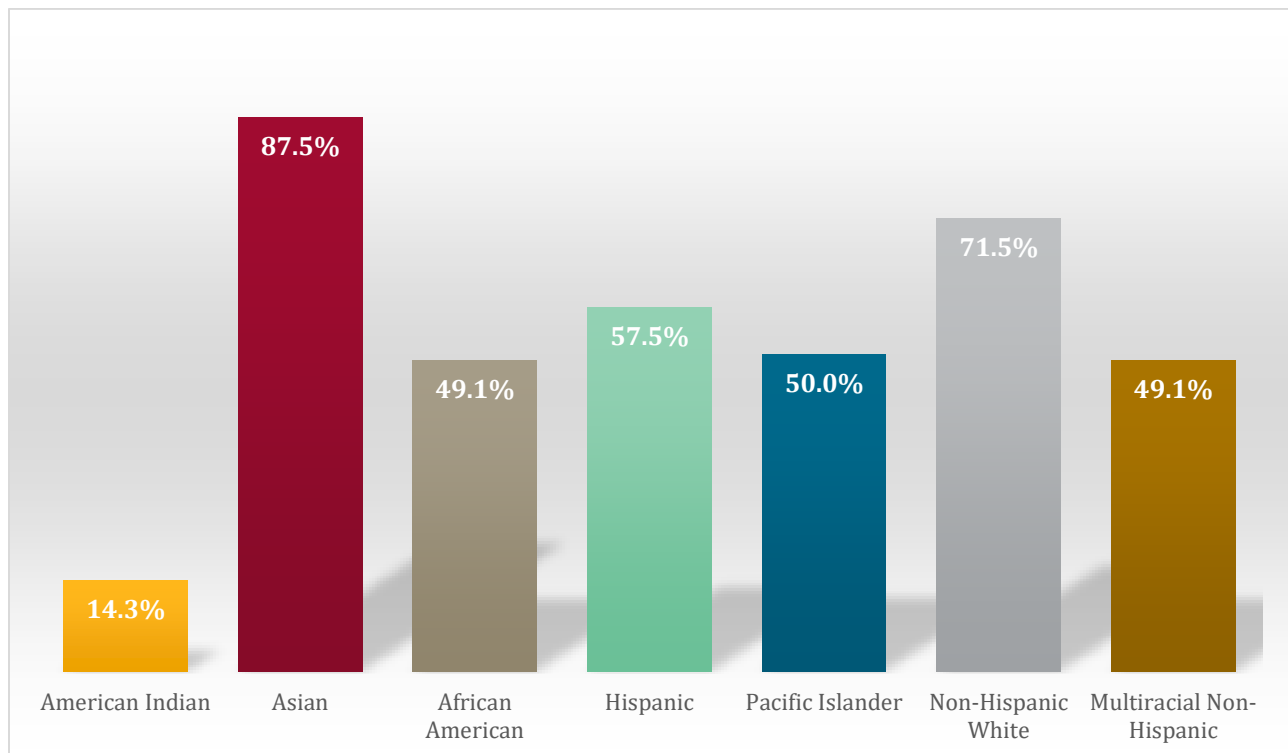
Denial Reasons	Male	Female
Credit history	144 41.14%	88 44.44%
Debt-to-income ratio	100 28.57%	62 31.31%
Collateral	65 18.57%	25 12.63%
Credit application incomplete	28 8.00%	10 5.05%
Insufficient cash	20 5.71%	15 7.58%
Unverifiable information	13 3.71%	15 7.58%
Employment history	9 2.57%	8 4.04%
Mortgage insurance denied	0 0.00%	1 0.51%
Other	41 11.71%	26 13.13%
N	350	198

**Table 41 - Minority Status and Denial Reasons**

Denial Reasons	Non-Hispanic White	Non-White
<i>Credit history</i>	<i>102 45.33%</i>	<i>124 40.66%</i>
<i>Debt-to-income ratio</i>	<i>67 29.78%</i>	<i>90 29.51%</i>
<i>Collateral</i>	<i>40 17.78%</i>	<i>45 14.75%</i>
<i>Insufficient cash</i>	<i>11 4.89%</i>	<i>21 6.89%</i>
<i>Credit application incomplete</i>	<i>10 4.44%</i>	<i>26 8.52%</i>
<i>Employment history</i>	<i>7 3.11%</i>	<i>10 3.28%</i>
<i>Unverifiable information</i>	<i>8 3.56%</i>	<i>21 6.89%</i>
<i>Mortgage insurance denied</i>	<i>0 0.00%</i>	<i>1 0.33%</i>
<i>Other</i>	<i>26 11.56%</i>	<i>37 12.13%</i>
Total	225	305

**Table 42 - Approval Rates by Race/Ethnicity**

	Not Approved	Approved
American Indian	85.7% 6	14.3% 1
Asian	12.5% 2	87.5% 14
African American	50.9% 319	49.1% 308
Hispanic	42.5% 71	57.5% 96
Pacific Islander	50.0% 1	50.0% 1
Non-Hispanic White	28.5% 586	71.5% 1470
Multiracial Non-Hispanic	50.9% 27	49.1% 26
Total	31.4% 1,128	68.6% 2,463



**Figure 24 - Approval Rates by Race/Ethnicity 2018**

**Table 43 - Race/Ethnicity and Denial Reasons 2018**

Race/Ethnicity		Debt-to-income ratio	Employment history	Credit history	Collateral	Insufficient cash	Unverifiable information	App incomplete	Mortgage insurance denied	Other	Total
American Indian	N	1	0	0	0	0	0	0	0	0	1
	%	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
African American	N	59	5	97	35	11	7	9	0	22	204
	%	28.9%	2.5%	47.5%	17.2%	5.4%	3.4%	4.4%	0.0%	10.8%	
Hispanic	N	8	6	8	4	4	1	0	0	7	29
	%	27.6%	20.7%	27.6%	13.8%	13.8%	3.4%	0.0%	0.0%	24.1%	
Non-Hispanic White	N	87	5	118	44	19	20	26	1	32	286
	%	30.4%	1.7%	41.3%	15.4%	6.6%	7.0%	9.1%	0.3%	11.2%	
Multiracial Non-Hispanic	N	5	1	5	4	0	1	1	0	2	16
	%	31.3%	6.3%	31.3%	25.0%	0.0%	6.3%	6.3%	0.0%	12.5%	
Total	N	160	17	228	87	34	29	36	1	63	536
	%	29.9%	3.2%	42.5%	16.2%	6.3%	5.4%	6.7%	0.2%	11.8%	100%



### ***Approvals by Income***

Bivariate analysis of approvals by income show that applications that were approved showed a mean income \$8,080 over that of applications that were not approved. According to an independent samples t-test, the difference is statistically significant ( $t=-2.298$ ,  $df=3076$ ,  $p<.05$ ). In order to further analyze the relationship between income and approval rate, applicant income were recoded into five categories based on z-score below the mean income (less than \$74,670), mean income to +1 standard deviation above (up to \$93,308), between +1 and +5 standard deviations above the mean (up to \$466,540), between +5 and +20 standard deviations above the mean (up to \$1.87 million), and more than +20 standard deviations above the mean (over \$1.87 million). The resulting crosstabulation shows that, as expected, the approval rate goes up with income, but only to a certain point. The association was statistically significant (Pearson Chi-Square=34.967,  $df=4$ ,  $p<.001$ ). Note that the percentage of approvals goes up as income increases until the fourth group (incomes above \$466,540). It was surmised that the decrease in the percentage of approvals at the \$466,540 to

\$1.87 million range was due in part to the loan amounts requested on the applications.

The FHFA sets the conforming loan limit size for different areas on an annual basis, though it changes infrequently. As of 2018, the limit was set at \$453,100 for most of the country. Loans above that amount are considered non-conforming, 'Jumbo' loans with higher interest rates and higher associated risk. Unlike conventional mortgages, a jumbo loan is not eligible to be purchased, guaranteed, or securitized by Fannie Mae or Freddie Mac. Designed to finance luxury properties and homes in highly competitive real estate markets, jumbo mortgages come with unique requirements and tax implications.

As income increased in our Goldsboro data, so to did the size of the loans ( $r=.198$ ,  $p<.001$ ). A loan-to-income ratio was then calculated to control for this issue. A ratio of less than 1.0 would mean a loan amount of less than the income of the applicant. A ratio of 2.0 (the mean) would be a loan amount requested that is twice the annual reported income of the applicant. This ratio was then converted into a Z-score and recoded into five categories: below the mean (a ratio of 2.52 or less); mean income to +1 standard

deviation above (a ratio of up to 2.86), between +1 and +5 standard deviations above the mean (a ratio of up to 14.28), between +5 and +20 standard deviations above the mean (a ratio up to 57.14), and more than +20 standard deviations above the mean (loans of more than 57.14 times the annual reported income of the applicant). A crosstabulation of approvals vs. loan-to-income ratio shows that, as expected, the approval rate decreases consistently as the ratio increases. The association was statistically significant (Pearson Chi-Square=38.924,  $df=4$ ,  $p<.001$ ).

#### ***Approvals by Community Measures***

Community measures provide for the setting in which properties are located. These geographic settings (neighborhoods, census tracts, block groups) are highly related to the

social characteristics of individuals living within them. We see by comparing mean numbers of approvals to non-approvals that census blocks that had higher populations were approved on average more than those with lower populations. Census tracts with lower percentages of ethnic/racial minorities were approved more often on average. Likewise, tracks with a higher relative income, more owner-occupied dwellings, and more single family than multifamily residences had higher mean approval rates. Percent minority, tract-to-MSA income ratio, and percentage owner-occupied units were all statistically significant ( $p<.001$ ). Thus, it is important to control for community factors when analyzing application approval.

***Table 44 - Income and Approval***

Income Category on Z-Score		Not Approved	Approved
Below mean income	Count	786	1246
	%	38.7%	61.3%
Mean income to +1 Standard Dev	Count	263	634
	%	29.3%	70.7%
+1 to +5 Standard Dev	Count	33	108
	%	23.4%	76.6%
+5 to +20 Standard Dev	Count	3	4
	%	42.9%	57.1%
More than +20 Standard Deviations above the mean	Count	1	0
	%	100.0%	0.0%
Total	Count	1,086	1,992
	%	35.3%	64.7%

**Table 45 - Loan to Income Ratio and Approval**

Loan to Income Ratio		Not Approved	Approved
Below mean income	Count	2	0
	%	100.0%	0.0%
Mean income to +1 Standard Dev	Count	244	378
	%	39.2%	60.8%
+1 to +5 Standard Dev	Count	792	1586
	%	33.3%	66.7%
+5 to +20 Standard Dev	Count	42	22
	%	65.6%	34.4%
More than +20 Standard Deviations above the mean	Count	6	6
	%	50.0%	50.0%
Total	Count	1086	1992
	%	35.3%	64.7%

**Table 46 - Community Measure Means Approved vs. Not Approve**

	Approval	N	Mean	Std. Deviation	Std. Error Mean
Population	Not approval	1,128	5676.53	1632.27	48.60
	Approval	2,463	5802.12	1461.28	29.44
Percent_Min	Not approval	1,128	43.57	20.23	0.60
	Approval	2,463	39.95	19.03	0.38
Tract_to_MSA_inc	Not approval	1,128	99.62	27.43	0.82
	Approval	2,463	105.02	26.98	0.54
OwnerOCCunits	Not approval	1,128	1389.91	537.34	16.00
	Approval	2,463	1460.70	515.117	10.38
One_to_four_famunits	Not approval	1,128	2253.20	640.77	19.08
	Approval	2,463	2284.06	585.54	11.80

## Odds of Approval

The primary focus of this section is to observe differences in mortgage applications by race/ethnicity of the applicant to see if there is evidence of structural barriers to home ownership for minority groups.

Logistic regression is a common technique for studying fair lending practices across applications (Avery, Beeson, Calem 1997; Covington 2000; Giles and Courchane 2000; Calem and Longhofer 2002). In a logistic regression the dependent variable is binary: the mortgage application is accepted or not accepted. Since the dependent variable is not continuous<sup>18</sup>, other multivariate analysis techniques that would control for the various independent variables (loan characteristics, property characteristics, applicant characteristics, and community factors) may not be used. Instead, probabilities of loan acceptance are plotted, and multivariate regression is used to predict the odds that a loan application would be approved when holding constant

the loan characteristics, property characteristics, applicant characteristics, and community factors. The following logistic regression models were developed based upon what was learned in the previous section about the factors associated with acceptance rates and the causes of denials.

### ***Model 1 Approval for Minority vs. Non-Hispanic White Populations***

As a baseline model, loan characteristics, community characteristics, and applicant characteristics were explored. The first block of the model (loan characteristics) shows that when all other factors are equal, there is a 65.7% decrease in the odds that loans for home improvements or refinancing would be approved when compared to loans for the purchase of a home<sup>19</sup>. This variable was statistically significant. The odds that a loan for a manufactured home would be approved was 33.6% less likely than a site-built home. The odds of approval for an FHA, VA, or RHS an FHS loan was 20.8% less than the odds of approval for a conventional loan. Finally, the odds of approval increase .20%

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<sup>18</sup> Variable where the scale is not made up of discrete steps. Therefore the variable may be expressed by a large range (often infinite) of values. For example: Age, amount of loan, and family income are continuous variables in this dataset.

<sup>19</sup> Coefficient to percentage formula:  $(e^b - 1) * 100\%$ .

per every thousand over the mean of \$140,156.

The second block of the model takes into consideration community characteristics. Population, Percent Minority, Census Tract to MSA Income, Owner Occupancy, and number of one to four family units in a neighborhood were not statistically significant.

The third block of the model takes into consideration individual characteristics of the primary applicant. When controlling for other factors, minority status was statistically significant predictors of the odds of loan approval. The odds that mortgage applications from minority primary applicants would be approved was 55.6% lower than that of Non-Hispanic White applicants.

### ***Model 2 Approval by Race/Ethnic Groups***

The second model uses the same loan characteristics, community characteristics, and applicant characteristics, but explores additional information regarding the race/ethnicity of the primary applicant.

The third block of the model takes into consideration the sex, race/ethnicity, and income of the applicant. The odds that

mortgage applications would be approved from primary applicants who were Hispanic was 53.5% lower than odds of approval for non-Hispanic white applicants. African Americans were 55.4% less likely to be approved while Other minorities were 66.3% less likely. Asians too had lower odds but due to the low number of Asian applicants, the coefficient was not statistically significant.

### ***Model 3 Approval Accounting for Loan to Income Ratio***

The third model attempts to improve fit by decreasing the number of variables (and thus the degrees of freedom *df*). Fit statistics are used to help the researcher arrive at a model that uses the least number of variables to explain the greatest amount of variance. While only a marginal improvement, Model 3 takes into account the interaction between income and amount of loan noted previously and eliminates the non-significant community measure of number of one to four family houses in a tract. It uses all of the other variables (loan characteristics, community characteristics, and applicant characteristics) of Model 2 with nearly equal results. The added variable loan to income ratio clearly shows that the odds of approval decrease 2.8% for every

unit increase in the loan-to-income ratio. For example, a house that is three times the reported family income would be 8.4% less likely to be approved than one that is the same as the family income.

### ***Limitations***

Many of the factors which enter into the loan officer's decision to approve or deny a loan were not contained in the HMDA dataset. For example: wealth and savings, employment history, debt-to-income ratio (P/I ratio), loan-to-value ratio, personal credit history and credit score are not all completed in the Loan Application Register. These factors would be important controls for a more rigorous test of sex or race/ethnic disparities in mortgage application approvals. Another limitation comes from the great deal of missing or incomplete data in the records. Dietrich (2001) notes that

missing data has been a consistent problem with HMDA data, explaining that in 1999 nearly a fifth of conventional loan applications and up to half of the FHA loans for home improvements lacked race/ethnic data. In this report, it was noted that the sex of the applicant was unknown in about 16.8% of cases out of the total 3591 applications. More importantly, about a fifth of applications (18.5%) were missing ethnicity. Likewise, 83.5% of applications that were denied lacked reason for denial. In logistic regression missing data presents a problem for bias. Deletion of a case occurs if there is a missing value for any single variable in the model. About one-fifth of cases (21.7%) were omitted in the logistic regression due to missing data.

**Table 47 - Logistic Regression Models 1-3**

	Model 1			Model 2			Model 3		
	$\beta$	Sig.	Exp( $\beta$ )	$\beta$	Sig.	Exp( $\beta$ )	$\beta$	Sig.	Exp( $\beta$ )
<b>Constant</b>	1.512	***	4.536	1.559	***	4.756	1.519	***	4.568
<b>Loan Characteristics</b>									
Home Improvement or Refinancing	-1.071	***	0.343	-1.096	***	0.334	-1.136	***	0.321
Not Owner Occupied	-0.278		0.757	-0.3		0.741	-0.346	**	0.708
Manufactured	-0.409	***	0.664	-0.399	***	0.671	-0.446	***	0.64
Non-Conventional Loan	-0.233	*	0.792	-0.225	***	0.798	-0.102	-	0.903
Loan Amount (Thousands) <sup>†</sup>	0.002	**	1.002	0.002	***	1.002	-	-	-
<b>Community Characteristics</b>									
Population <sup>†</sup>	0.021	-	1.021	0.011	-	1.011	0.029	-	1.029
Percent Minority <sup>†</sup>	0.002	-	1.002	0.003	-	1.003	0.003	-	1.003
Census Tract to MSA Income <sup>†</sup>	0.005	-	1.005	0.005	-	1.005	0.006		1.006
Owner Occupancy <sup>†</sup>	-0.017	-	0.983	-0.015	-	0.985	-0.01	-	0.99
One to Four Family Units <sup>†</sup>	0.086	-	1.09	0.108	-	1.114	0.052		1.054
<b>Applicant Characteristics</b>									
Female	-0.059	-	0.943	-0.081	-	0.922	-0.105	-	0.901
Minority	-0.812	***	0.444		-		-	-	-
Hispanic	-	-	-	-0.766	***	0.465	-0.788	***	0.455
African American	-	-	-	-0.807	***	0.446	-0.811	***	0.444
Asian	-	-	-	-0.51		0.601	-0.475	-	0.622
Other (Multiracial, Native American, Pacific Islanders)				-1.087	***	0.337	-1.070	***	0.343
Income (Thousands) <sup>†</sup>	.000	-	1.000	.000	-	1.000	-	-	-
Loan to Income Ratio <sup>†</sup>	-	-	-	-	-	-	-0.028	*	0.972
Classification Table Percent Correct	71.2%			71.4%			71.2%		
-2 Log Likelihood	3298.676			3292.938			3297.894		
Cox & Snell R <sup>2</sup>	.107			.109			.108		
Nagelkerke R <sup>2</sup>	.148			.151			.149		
Model Chi-Square	319.511	***		325.25	***		320.293	***	
df	13			16			15		
N	2812			2812			2812		
Missing	779			779			779		

\*p<.05; \*\*p<.01; \*\*\*p<.001

<sup>†</sup> Centered on Mean



**Table 48 - Model 3 Comparison of Odds Ratio as Percent Likelihood of Approval**

	Constant	Female	Hispanic	Asian	African American	Other	Sum	Exp( $\beta$ )	Probability of Approval Relative to White Men	Percent Difference from White Men
	$\beta$	$\beta$	$\beta$	$\beta$	$\beta$	$\beta$				
White Male	1.519						1.519	4.568		
White Female	1.519	-0.105					1.414	4.112	0.900	-10.0%
Asian Male	1.519			-0.475			1.044	2.841	0.622	-37.8%
Asian Female	1.519	-0.105		-0.475			0.939	2.557	0.560	-44.0%
Hispanic Male	1.519		-0.788				0.731	2.077	0.455	-54.5%
Hispanic Female	1.519	-0.105	-0.788				0.626	1.870	0.409	-59.1%
Black Male	1.519				-0.811		0.708	2.030	0.444	-55.6%
Black Female	1.519	-0.105			-0.811		0.603	1.828	0.400	-60.0%
Other Male	1.519					-1.07	0.449	1.567	0.343	-65.7%
Other Female	1.519	-0.105				-1.07	0.344	1.411	0.309	-69.1%

## OTHER INDICATORS OF DISPARITIES

HUD's Analysis of Impediments process includes an assessment tool that may be used by program participants to evaluate fair housing choice and access to opportunity in their jurisdictions, to identify barriers to fair housing choice and opportunity at the local and jurisdictional levels, and to set fair housing goals to overcome such barriers and advance fair housing choice. HUD has created the Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T)<sup>20</sup> which is publicly available and also for use by program participants to access HUD-provided data to conduct the fair housing analysis required as part of the Assessment of Fair Housing. On May 18, 2016 - A map rendering update was made to the AFFH-T updating R/ECAP map data from 2006-2010 ACS to 2009-2013 ACS. On September 29, 2017 AFFH-T Release 4.1 included functionality for some Public Housing Agency (PHA) maps and tables, additional features for the beta versions of state maps and tables, and other enhancements to the user experience. In this report, we have used

data from the latest AFFH Tool version AFFHT0006 released July 10, 2020.

### Dissimilarity Trends

The Gini Index is a statistical measure of distribution that is often used to track economic inequality. It measures how wealth is distributed in a given population. A higher value means greater inequality. A Gini value of 0 means a perfectly equal society, where everyone's income is the same. A value of 1, represents perfect inequality, in which only one group or area has all the wealth. Concentrated poverty itself becomes a significant impediment to fair housing choice because those living in such areas must spend far more time and money in order to purchase groceries or medicine, find opportunities for entertainment, or place their children in daycare while working. Since employment opportunities are also limited in such areas, residents must commute outside their residential communities for virtually all of their daily needs. Yet, a large percentage of affordable housing for lower-income households is

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<sup>20</sup> See <https://egis.hud.gov/affht/>

found only in such concentrated areas of poverty. In the case of Goldsboro, the Gini Index for the city is .50. However, according to the American Community Survey (ACS) there are Census Tracts in the western portion of the city where income inequality is as high as .66 (Census Tract 37191001800). In this case, the Gini Index is indicating concentrations of poverty.

### Diversity Indices

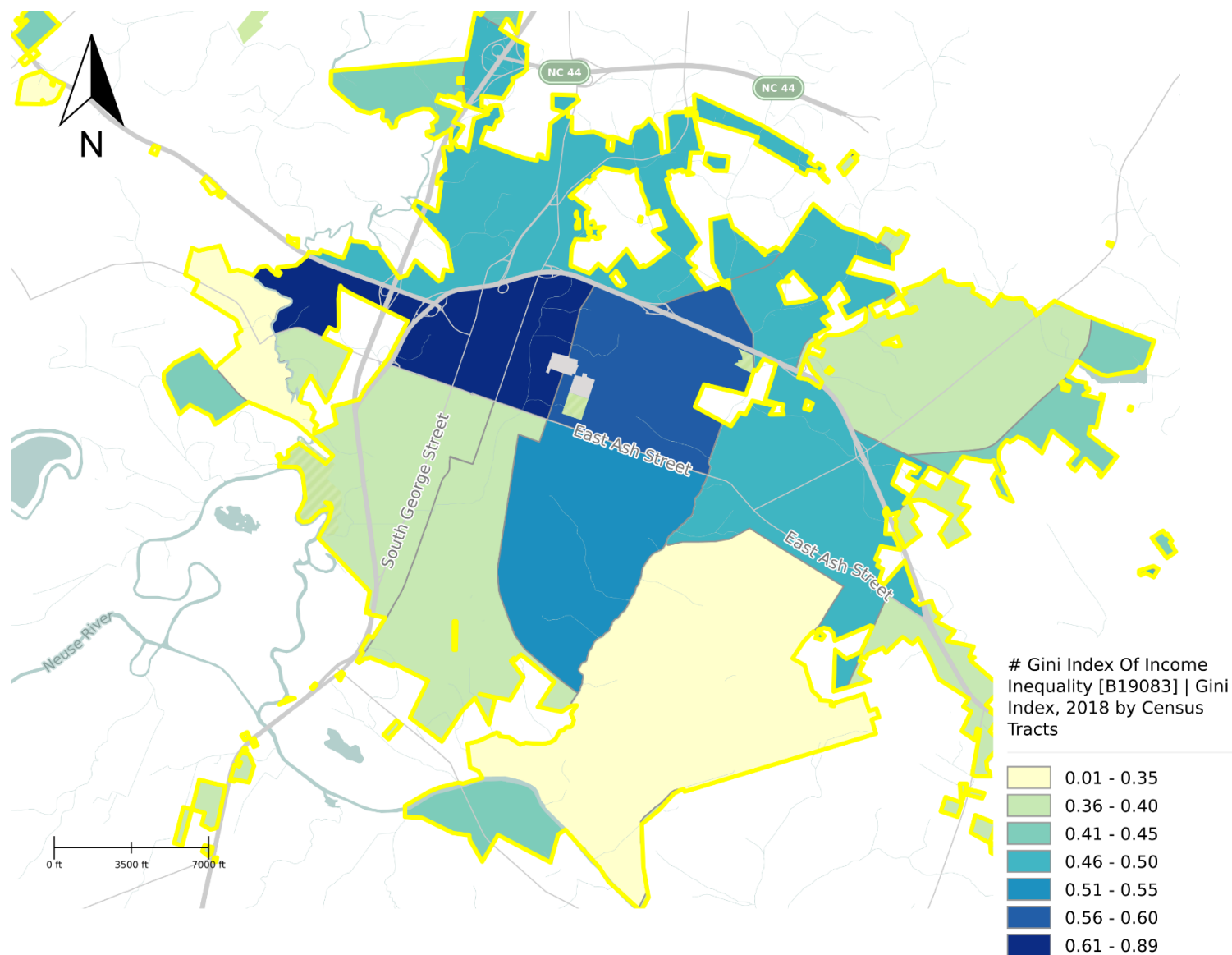
The *diversity index* is an index ranging from 0 to 87.5 that represents the probability that two individuals, chosen at random in the given geography, would be of different races or ethnicities. Lower index values between 0 and 20 suggest more homogeneity and higher index values above 50 suggest more heterogeneity. Racial and ethnic diversity can be indicative of economic and behavioral patterns. For example, racially and ethnically homogenous areas are sometimes representative of concentrated poverty or concentrated wealth. They could also be

indicative of discriminatory housing policies or other related barriers. According to this index the least diversity is found in Goldsboro neighborhoods where the predominate populations are over 70% African American.

Similar to the Gini coefficient for income, the *index of dissimilarity* is a demographic measure of the evenness with which two groups are distributed across a geography. The index of dissimilarity can be used as another measure of segregation between particular race/ethnic groups. It can be interpreted as the percentage of one of the two groups that would have to move into an area where the other group is predominant in order to distribute the groups more evenly. While the trend from 1990 to 2010 on the most part was declining (communities were becoming more diverse and less segregated) the trend from 2010 to now is clearly increasing in dissimilarity and in fact nearly as segregated as 1990.

**Table 49 - Racial/Ethnic Dissimilarity Index**

	1990 Trend	2000 Trend	2010 Trend	Current
<b>Non-White/White</b>	42.85	38.08	38.00	40.10
<b>Black/White</b>	45.69	41.78	42.99	43.86
<b>Hispanic/White</b>	28.61	19.97	19.24	26.66
<b>Asian/White</b>	19.37	15.80	19.31	25.97



**Figure 25 – GINI Index of Income Inequality (2018)**

# Goldsboro, NC

Diversity Index by Census Tract  
Data Source: US Census 2017

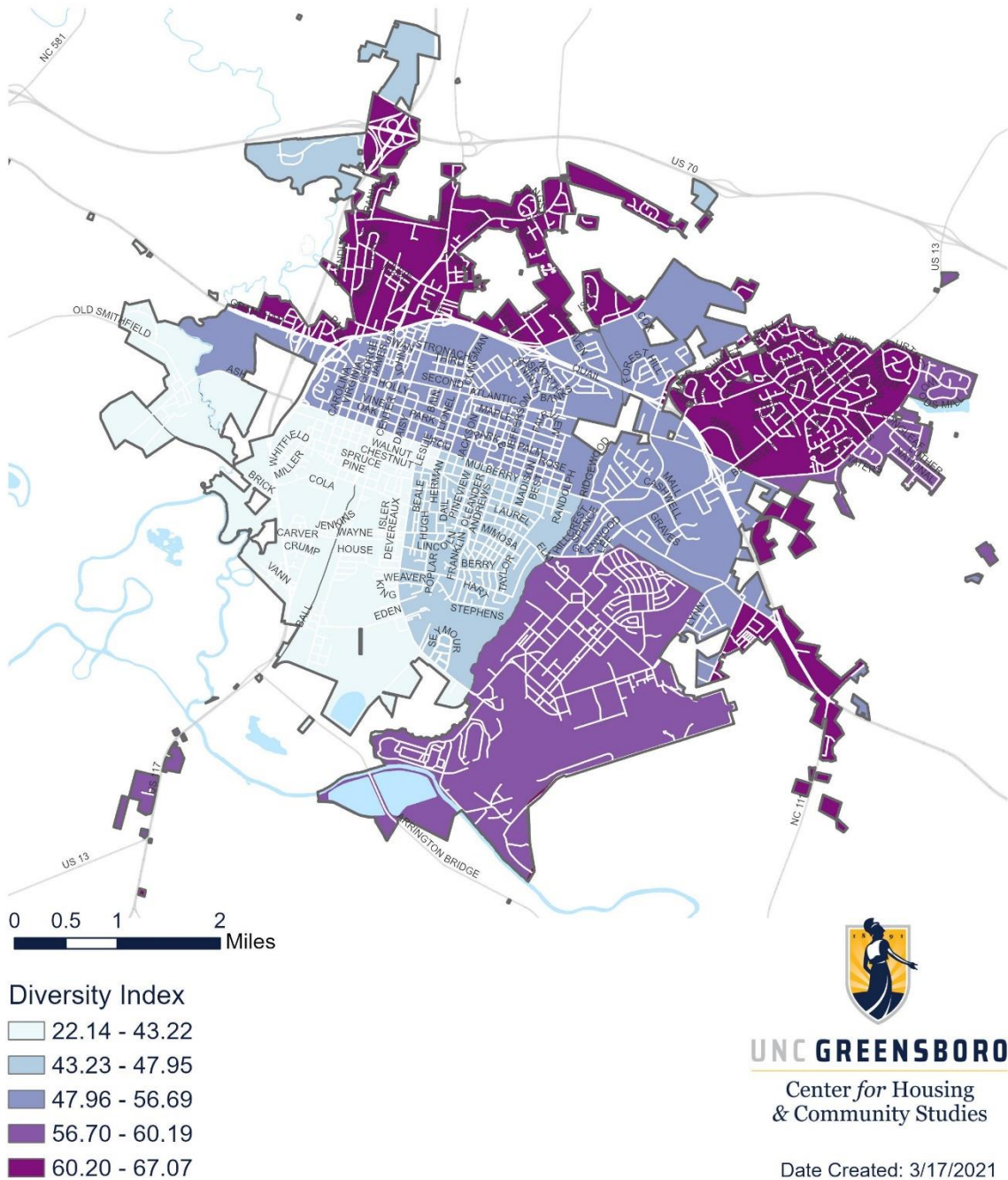


Figure 26 - Diversity Index (ACS 2013-2017)

## **Concentrations of Poverty & Race**

Geospatial analysis shows a resurgence of racial/ethnic isolation and a “concentration effect” of poverty and marginalization. GIS mapping of American Community Survey data reveals that Goldsboro has pockets that are highly segregated by race and income. Such residential concentrations of a particular ethnic group combined with high rates of poverty may lead to the designation by the federal government as a racial or ethnic concentration of poverty, or an “R/ECAP.” According to HUD, an “RCAP/ECAPs must have a non-white population of 50 percent or more. Regarding the poverty threshold, Wilson (1980) defines neighborhoods of extreme poverty as census tracts with 40 percent or more of individuals living at or below the poverty line... [or] three times the average tract poverty rate for the metro/micro area, whichever threshold is lower.” Race/Ethnic concentrations of poverty are accompanied by factors that have negative consequences for the health of individuals and families. Many of the poorest neighborhoods have only limited access to amenities such as good schools, health care, or affordable and

nutritious foods. Access to retail shopping and high-quality childcare is also quite limited in most of these areas. Combined with the relative lack of extensive public transit systems, persons living in such areas are greatly disadvantaged.

Census Tract 37191001800 (parts of zip code 27530 and 27534) has been designated by HUD as a R/ECAP. The area has a total population of 2,822 of whom 77.0% are African American, 16.9% non-Hispanic white, and 4.2% are Hispanic. There are 39 individuals (1.4% of population) who are foreign born from Caribbean and French origin. There are 661 family households and half (51.3%) are families with children. The population in this area has decreased 27.4% overall since 2000 (the White population changed by -41.6%, the African American population by -28.9%). The median household income for the area was \$19,107. More than 650 households (63.4%) live on less than \$25,000 of combined household income. Only 23.1% or 237 households owned their home. As of Q3 2020, 17.6% of residential units and 18.6% of business units were vacant according to Valassis Lists postal data.

**Table 50 - R/ECAP Demographics**

(Goldsboro, NC CDBG) Jurisdiction			
R/ECAP Race/Ethnicity		#	%
<b>Total Population in R/ECAPs</b>		2,822	-
<b>White, Non-Hispanic</b>		477	16.9%
<b>Black, Non-Hispanic</b>		2,173	77.0%
<b>Hispanic</b>		119	4.2%
<b>Asian or Pacific Islander, Non-Hispanic</b>		5	0.2%
<b>Native American, Non-Hispanic</b>		7	0.3%
<b>Other, Non-Hispanic</b>		6	0.2%
R/ECAP Family Type			
<b>Total Families in R/ECAPs</b>		661	-
<b>Families with children</b>		339	51.3%
R/ECAP National Origin			
<b>Total Population in R/ECAPs</b>		2,822	-
<b>#1 country of origin</b>	Other Caribbean	30	1.1%
<b>#2 country of origin</b>	France	9	0.3%

## Opportunity Indicators

HUD has developed a series of indices to help inform communities about segregation in their jurisdiction and region, as well as about disparities in access to opportunity.

### Low Poverty Index

The Low Poverty Index is based on the poverty rate and the values range from 0 to 100, with the highest scores signaling less exposure to poverty in a neighborhood. HUD created this index using data from the 2011-2015 American Community Survey.<sup>21</sup> Most of the values for low poverty within the City

of Goldsboro are between 1 and 30 with the exception of the area around Seymour Air Base where the low poverty index is between 60 and 80.

### School Proficiency Index

The School Proficiency Index summarizes which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. Values are percentile ranked and range from 0 to 100, with higher scores suggesting higher school system quality in a neighborhood. HUD created this index using

<sup>21</sup> <https://urban-data-catalog.s3.amazonaws.com/drupal-root-live/2020/08/04/AFFH-T-Data-Documentation-AFFHT0006-July-2020.pdf>



4th grade school performance data for 2016-2017 from Great Schools and the Common Core of Data, as well as 2018 Maponics attendance boundaries. Most of the values for school proficiency within Goldsboro are very low, between 1 and 30. Proficiency is higher in Wayne County.

### ***Labor Market Index***

The Labor Market Engagement Index provides an indication of the relative intensity of labor market engagement and human capital in a neighborhood. It is based upon the level of employment, labor force participation and educational attainment in a census tract. Values are percentile ranked nationally and range from 0 to 100, with higher scores representing greater labor force participation and human capital in a neighborhood. HUD created this index using data from the 2009-2013 American Community Survey. The Labor Market Engagement Index scores for Goldsboro were between 0 and 20 except for the areas of the northeast of the city where scores were as high as 58.

### ***Transit Index***

The Transit Trips Index is based on estimates of transit trips taken by a 3-person single-parent family with income at 50% of the

median income for renters for the region (i.e. the Core-Based Statistical Area (CBSA)). Values are percentile ranked nationally and range from 0 to 100. The higher the index score, the more likely residents in that neighborhood utilize public transit. The index controls for income such that a higher index value will often reflect better access to public transit. HUD created this index using 2012-2016 Location Affordability Index (LAI) data. We can see from the map of Goldsboro that the Transit Trips Index was highest in the R/ECAP (tract 37191001800) with a score of 34, the other tracts range from 0 to 30.

### ***Low Transportation Cost Index***

The Low Transportation Cost Index is based on transportation cost estimates for a 3-person single-parent family with income at 50% of the median income for renters for the region (i.e. CBSA). Values are inverted and percentile ranked nationally, with values ranging from 0 to 100. The higher the index score, the lower the transportation costs in that neighborhood. Low transportation costs can be indicative of many factors, such as good access to public transportation or a high density of homes, services, and jobs in and around a neighborhood. HUD created these estimates using 2012-2016 Location

Affordability Index (LAI) data. The scores for Goldsboro on the Low Transportation Cost Index were between 15 and 23 indicating fairly high costs of transportation.

### ***Jobs Proximity Index***

The Jobs Proximity Index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a CBSA, with larger employment centers weighted more heavily. Values are percentile ranked and range from 0 to 100. Higher index values suggest better access to employment opportunities for the residents of that block group. HUD created this index using 2017 Longitudinal Employer-Household (LEHD) data. This index, unlike most of the others, had a fairly robust score of 60 to 93 for Goldsboro neighborhoods with scores rising on the north end of the city along the major highways.

### ***Environmental Health Index***

The Environmental Health Index summarizes potential exposure to harmful toxins at a neighborhood level. Values are inverted and percentile ranked nationally. The values range from 0 to 100, with the higher index values suggesting less exposure to toxins harmful to human health and, thus, better environmental quality in an area. HUD

created this index using 2014 National Air Toxics Assessment data. Scores for Goldsboro on the Environmental Health Index are lowest (more harmful exposure) near the air base and the central area of the city with scores between 34 and 50. Further out along the city limits in the west and east scores rise into the 60s.

### ***Areas of Affordability***

Areas of affordability have also been mapped using the AFFH tool. Affordability is measured as the percentage of rental units that are renting at or less than 30 percent of household income for a household whose income is at 50 percent of area median income according to data from the Comprehensive Housing Affordability Strategy (CHAS 2011-2015). The highest area of affordability in Goldsboro is in the Census Tract designated as an R/ECAP where 75.2% of units are considered affordable.

### ***High Opportunity Areas***

These indices demonstrate some of the underlying issues facing Goldsboro in that poverty, poor schools, lack of labor force opportunity, and high transit costs are concentrated in the areas where we see affordable housing opportunity. Conversely, the areas of high opportunity with good job

proximity, better schools, lower levels of poverty, and good environmental health are in Census Tracts 37191001200 and 37191001301 on the northwest and northeast parts of town and, to a lesser degree just north of the Air Base in Census tract 37191001302.

### **Disparate Outcomes in Opportunity**

Disparities in Low Poverty, School Proficiency, and Labor Market Indices are clearly linked to racial and ethnic concentrations of poverty and lack of opportunity in low-wealth neighborhoods. Disaggregated by race and ethnicity we see that Asian residents on average have the highest (best) Low Poverty Index scores (48.3) followed by non-Hispanic whites (39.5), then Hispanics (35.1), and then Native Americans (26.9). In Goldsboro, the African American population's Low Poverty Index score is the lowest indicating high poverty overall (22.7). In fact, the scores of non-Hispanic whites, Hispanics, Asians, and Native Americans below the federal poverty line are all higher than the score for all African Americans (above and below the poverty line). While School Proficiency Scores are very low city-wide, we again see Asian (18.4) and non-Hispanic white (17.1)

populations having twice the score of African Americans (8.9). School Proficiency and poverty are clearly linked. The Labor Market Index also tracks with previous indicators whereas Asians score 38.6, non-Hispanic whites at 29.2, Hispanics at 24.4, but African Americans at 16.9. Disproportionality or disparities in Transit, Transportation Cost, Job Proximity, and Environmental Health Indices were not observed.

### **Disproportionality in Housing**

#### **Quality & Cost Burden**

We can clearly see in the maps and tables presented thus far that Black, Indigenous, and other People of Color (BIPOC) populations are disproportionately impacted by housing in Goldsboro. Homeownership rates are far lower for African Americans than for other race/ethnic groups. As we saw in the Community Overview, the African Americans and other people of color are more likely to be low income or living in poverty. We have also seen that African Americans in particular disproportionately live in neighborhoods where School Proficiency and Labor Market conditions are poor. Data from HUD demonstrates that BIPOC are twice as likely to experience severe housing cost burden

(spending more than 50% of income on housing), more likely to live in a home with four housing problems, and twice as likely to live in a home with four severe housing problems including incomplete kitchen facilities, incomplete plumbing facilities,

more than 1 person per room, and cost burden greater than 50%.

**Table 51 - Opportunity Indicators by Race/Ethnicity**

(Goldsboro, NC CDBG) Jurisdiction	Low Poverty Index	School Prof Index	Labor Market Index	Transit Index	Low Trans Cost Index	Jobs Proximity Index	Environ Health Index
Total Population							
<b>White, Non-Hispanic</b>	39.47	17.09	29.18	11.15	15.32	80.49	48.64
<b>Black</b>	22.73	8.94	16.90	13.97	16.38	77.04	49.34
<b>Hispanic</b>	35.06	15.50	24.36	14.34	15.32	78.90	47.85
<b>Asian</b>	48.27	18.39	35.63	9.02	16.10	84.93	47.95
<b>Native American</b>	26.90	15.25	21.59	15.41	14.93	68.64	50.57
Pop below poverty line							
<b>White, Non-Hispanic</b>	27.97	14.04	20.57	16.42	15.77	75.17	49.19
<b>Black</b>	13.47	5.61	10.10	18.01	16.97	75.84	49.56
<b>Hispanic</b>	27.45	11.65	30.21	11.98	12.72	70.88	54.28
<b>Asian</b>	38.53	17.76	25.69	17.21	17.37	81.29	45.60
<b>Native American</b>	24.23	10.35	22.73	17.73	11.74	62.22	53.90

**Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA**

Households with Severe Housing Cost Burden (Goldsboro, NC CDBG) Jurisdiction			
Race/Ethnicity	# with severe cost burden	# households	% with severe cost burden
White, Non-Hispanic	545	5,405	10.08%
Black, Non-Hispanic	1,565	7,216	21.69%
Hispanic	150	680	22.06%
Asian or Pacific Islander, Non-Hispanic	90	250	36.00%
Native American, Non-Hispanic	40	75	53.33%
Other, Non-Hispanic	85	208	40.87%
Total	2,475	13,850	17.87%
Household Type and Size			
Family households, <5 people	904	7,457	12.12%
Family households, 5+ people	220	935	23.53%
Non-family households	1,373	5,464	25.13%

*Note 1: Severe housing cost burden is defined as greater than 50% of income.*

Disproportionate Housing Needs (Goldsboro, NC CDBG) Jurisdiction			
Households experiencing any of 4 housing problems	# with problems	# households	% with problems
Race/Ethnicity			
White, Non-Hispanic	1,718	5,405	31.79%
Black, Non-Hispanic	3,279	7,216	45.44%
Hispanic	390	680	57.35%
Asian or Pacific Islander, Non-Hispanic	135	250	54.00%
Native American, Non-Hispanic	50	75	66.67%
Other, Non-Hispanic	100	208	48.08%
Total	5,675	13,850	40.97%
Household Type and Size			
Family households, <5 people	2,310	7,457	30.98%
Family households, 5+ people	630	935	67.38%
Non-family households	2,735	5,464	50.05%
Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems
Race/Ethnicity			
White, Non-Hispanic	722	5,405	13.36%
Black, Non-Hispanic	1,834	7,216	25.42%
Hispanic	205	680	30.15%
Asian or Pacific Islander, Non-Hispanic	100	250	40.00%
Native American, Non-Hispanic	40	75	53.33%
Other, Non-Hispanic	100	208	48.08%
Total	3,005	13,850	21.70%

*Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.*





**Figure 27 - Typical Housing Low vs High Opportunity Areas (Census Tract 37191001800 vs 37191001200)**

# Goldsboro, NC

Low Poverty Index, 2020 by Census Tract  
Data Source: HUD AFFHT0006

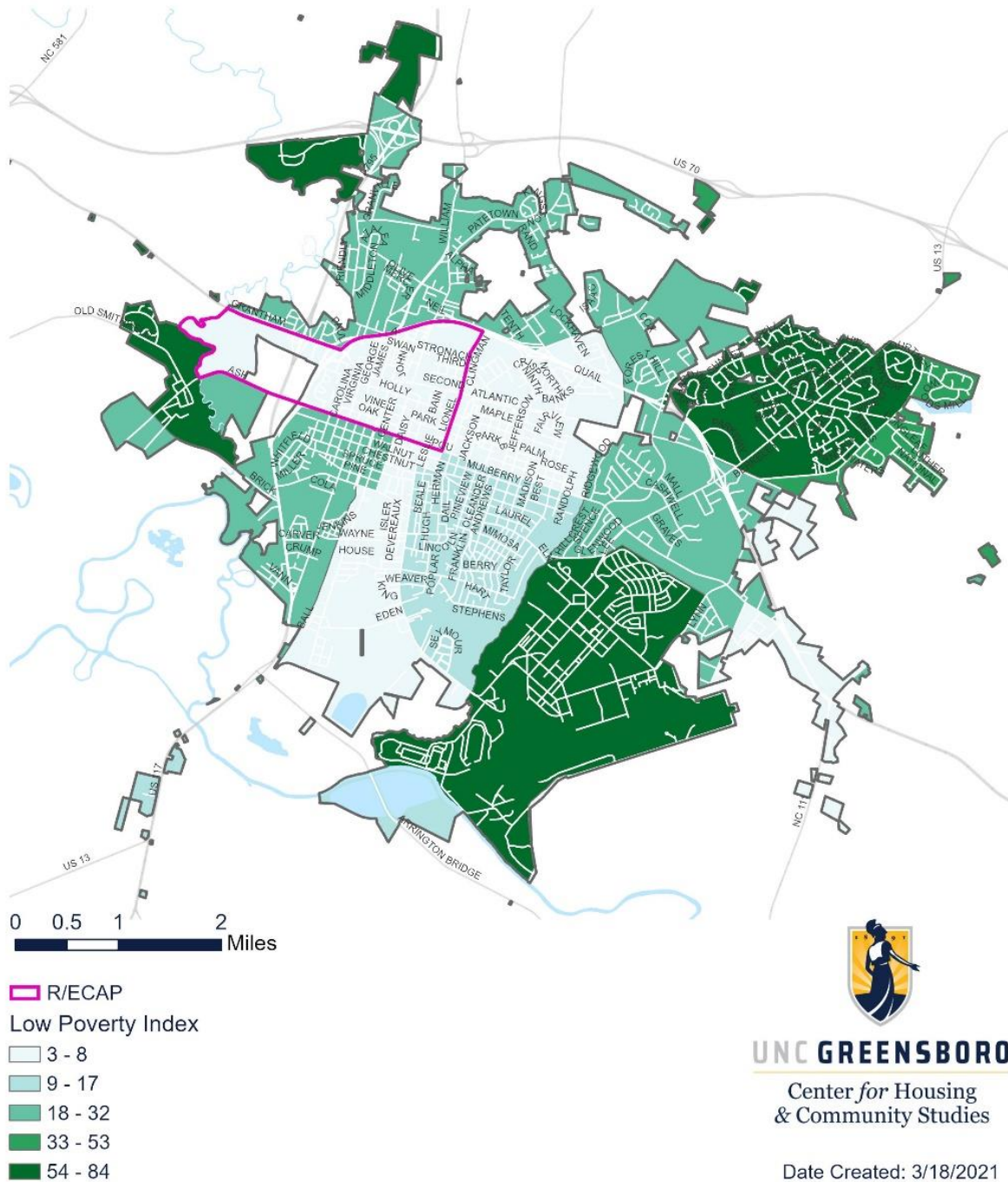


Figure 28 – Low Poverty Index 2020 (AFFHT0006)



# Goldsboro, NC

School Proficiency Index, 2020 by Block Group  
Data Source: HUD AFFHT0006

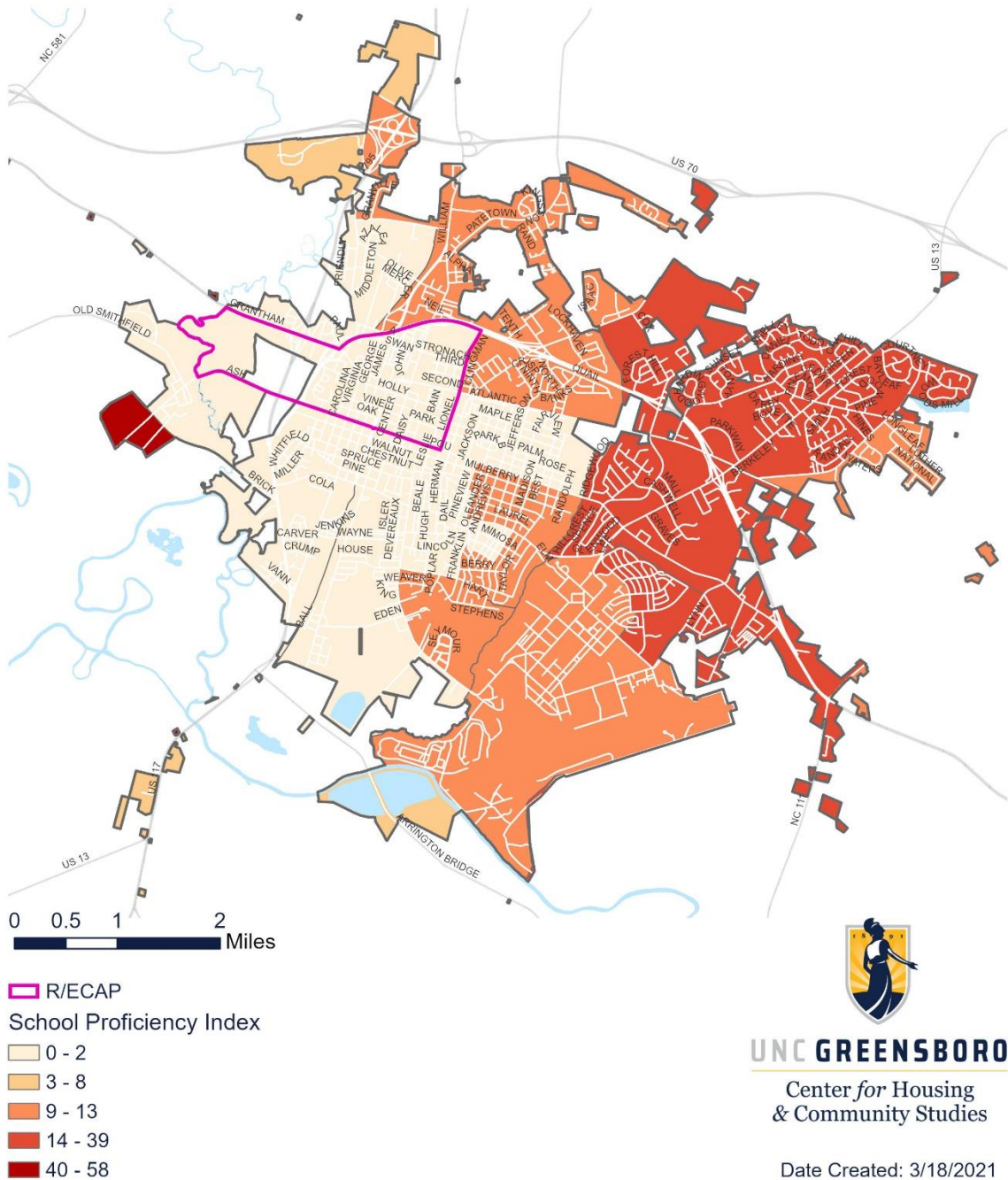


Figure 29 - School Proficiency Index 2020 (AFFHT0006)

# Goldsboro, NC

Labor Market Engagement Index, 2020 by Census Tract  
Data Source: HUD AFFHT0006

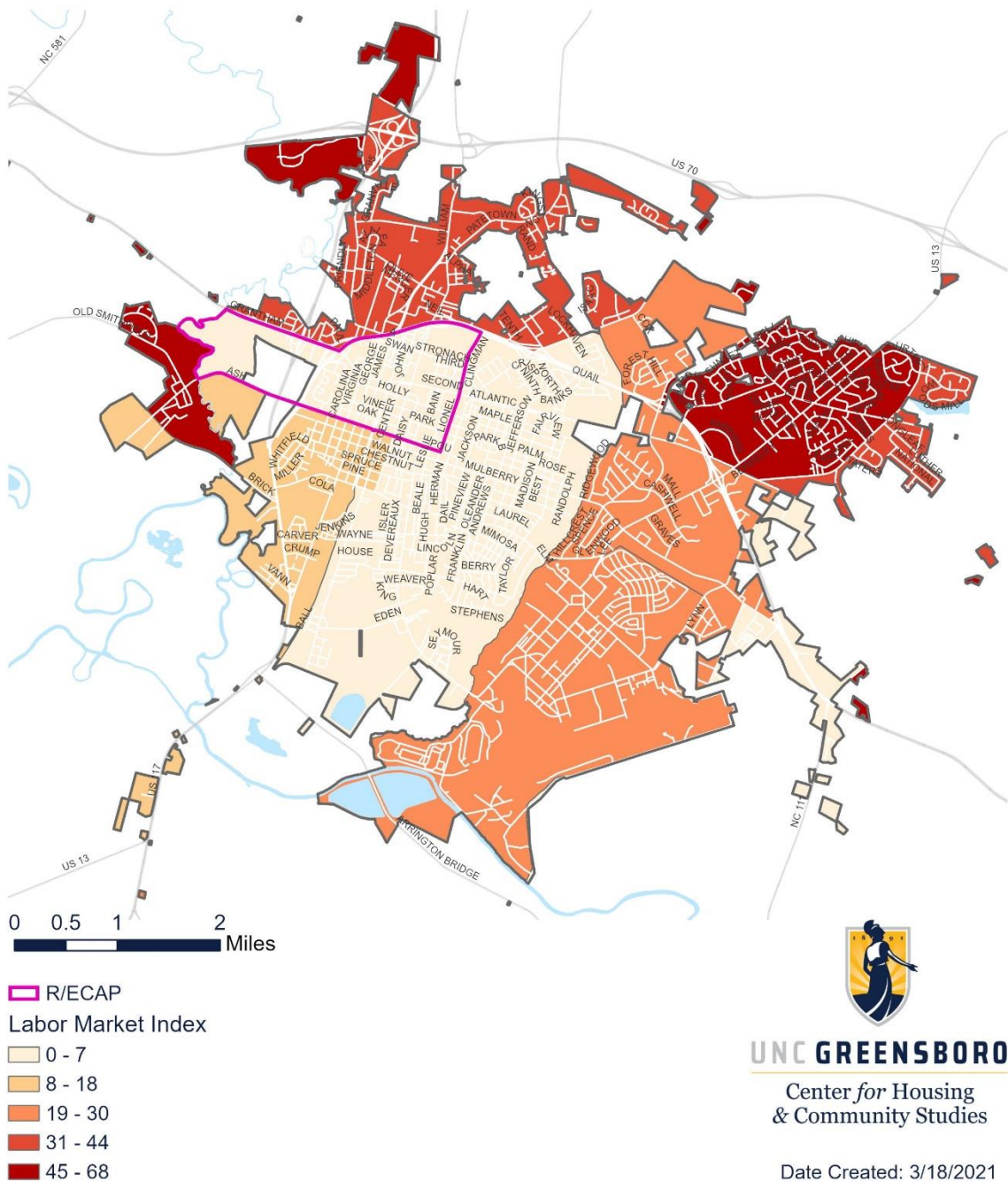


Figure 30 – Labor Market Engagement Index 2020 (AFFHT0006)

# Goldsboro, NC

Transit Trips Index, 2020 by Census Tract  
Data Source: HUD AFFHT0006

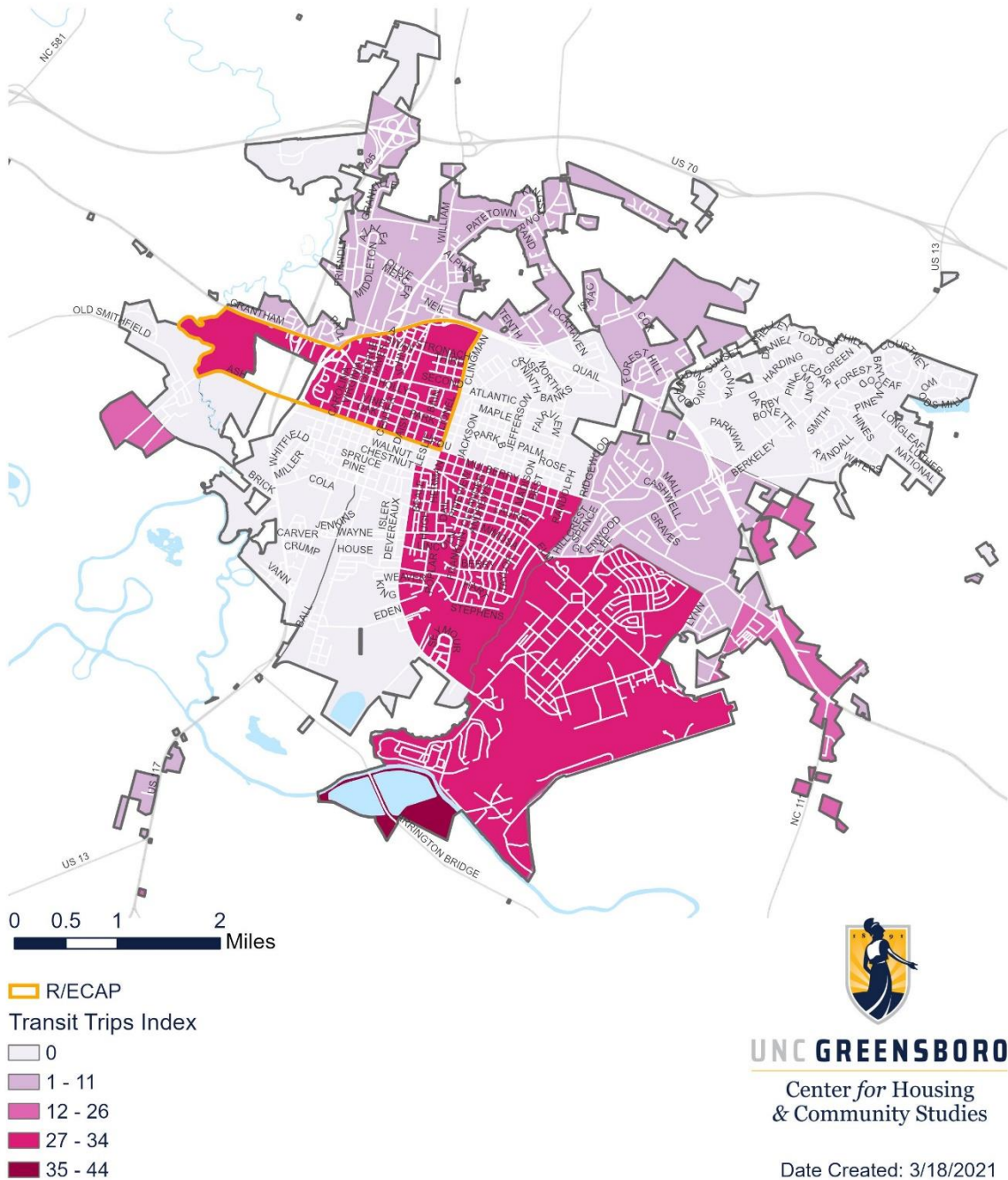


Figure 31 –Transit Trip Index 2020 (AFFHT0006)



# Goldsboro, NC

Low Transportation Cost Index, 2020 by Census Tract  
Data Source: HUD AFFHT0006

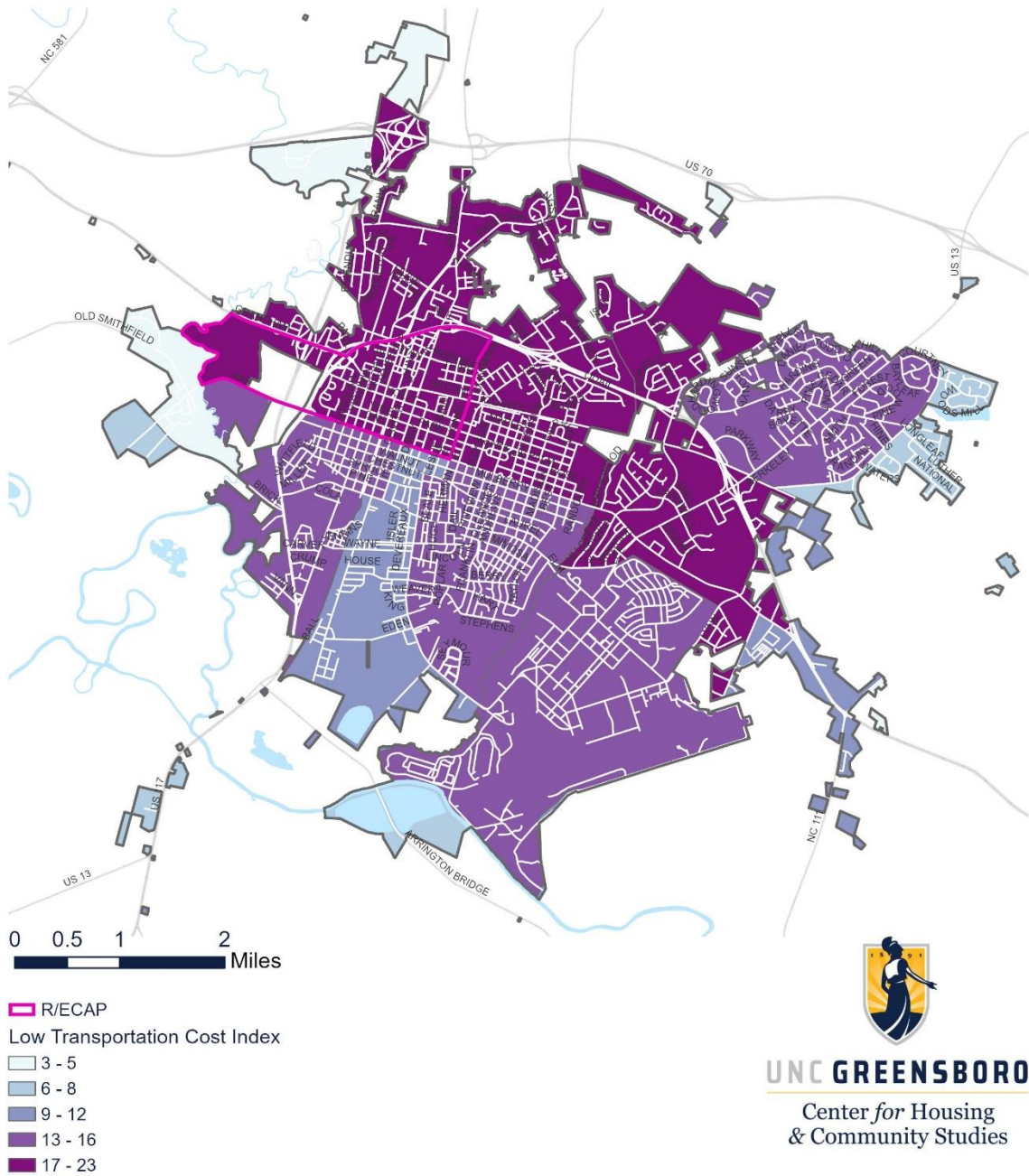


Figure 32 –Low Transportation Cost Index 2020 (AFFHT0006)

# Goldsboro, NC

Jobs Proximity Index, 2020 by Block Group  
Data Source: HUD AFFHT0006

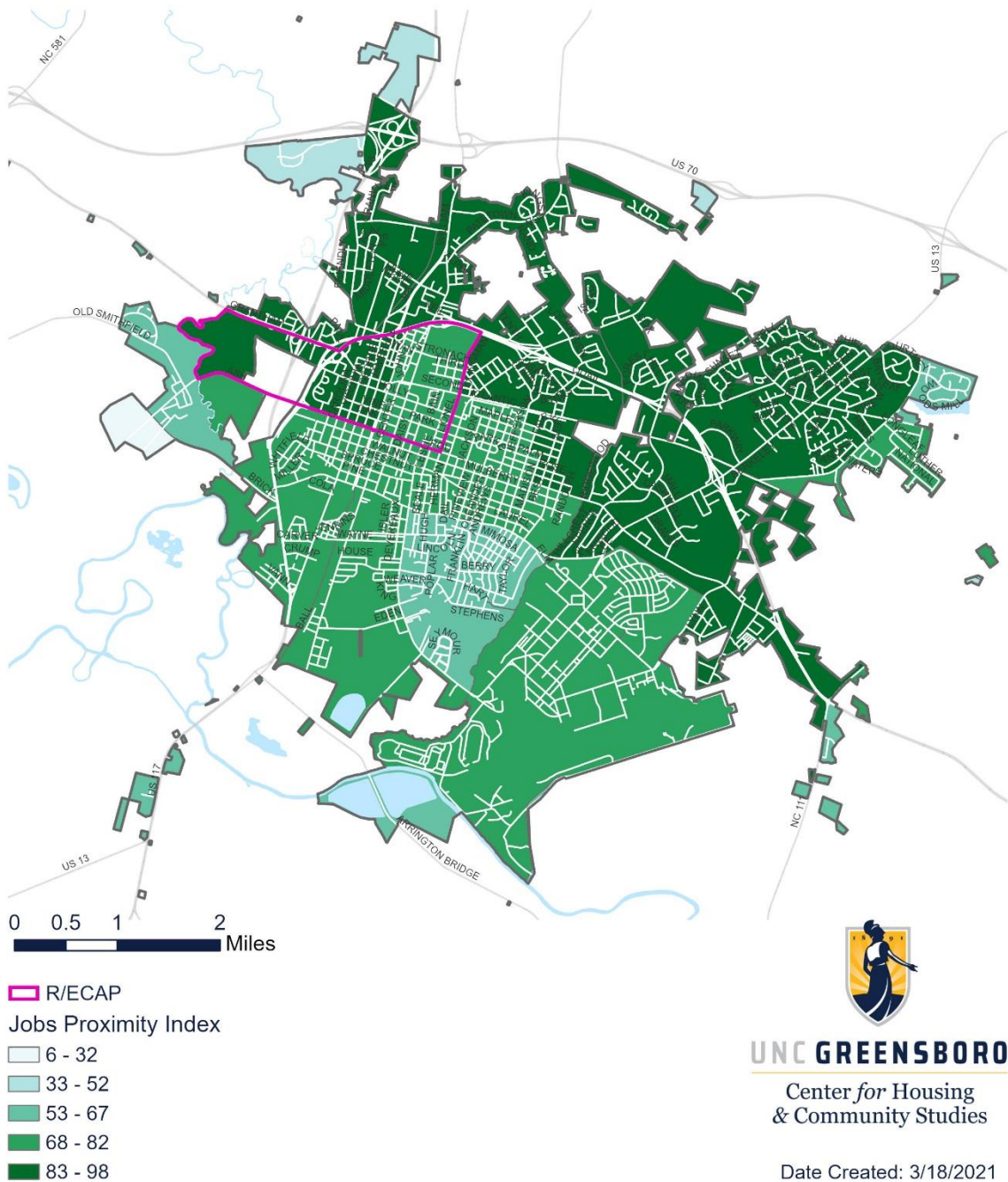


Figure 33 –Job Proximity Index 2020 (AFFHT0006)

# Goldsboro, NC

Environmental Health Index, 2020 by Census Tract  
Data Source: HUD AFFHT0006

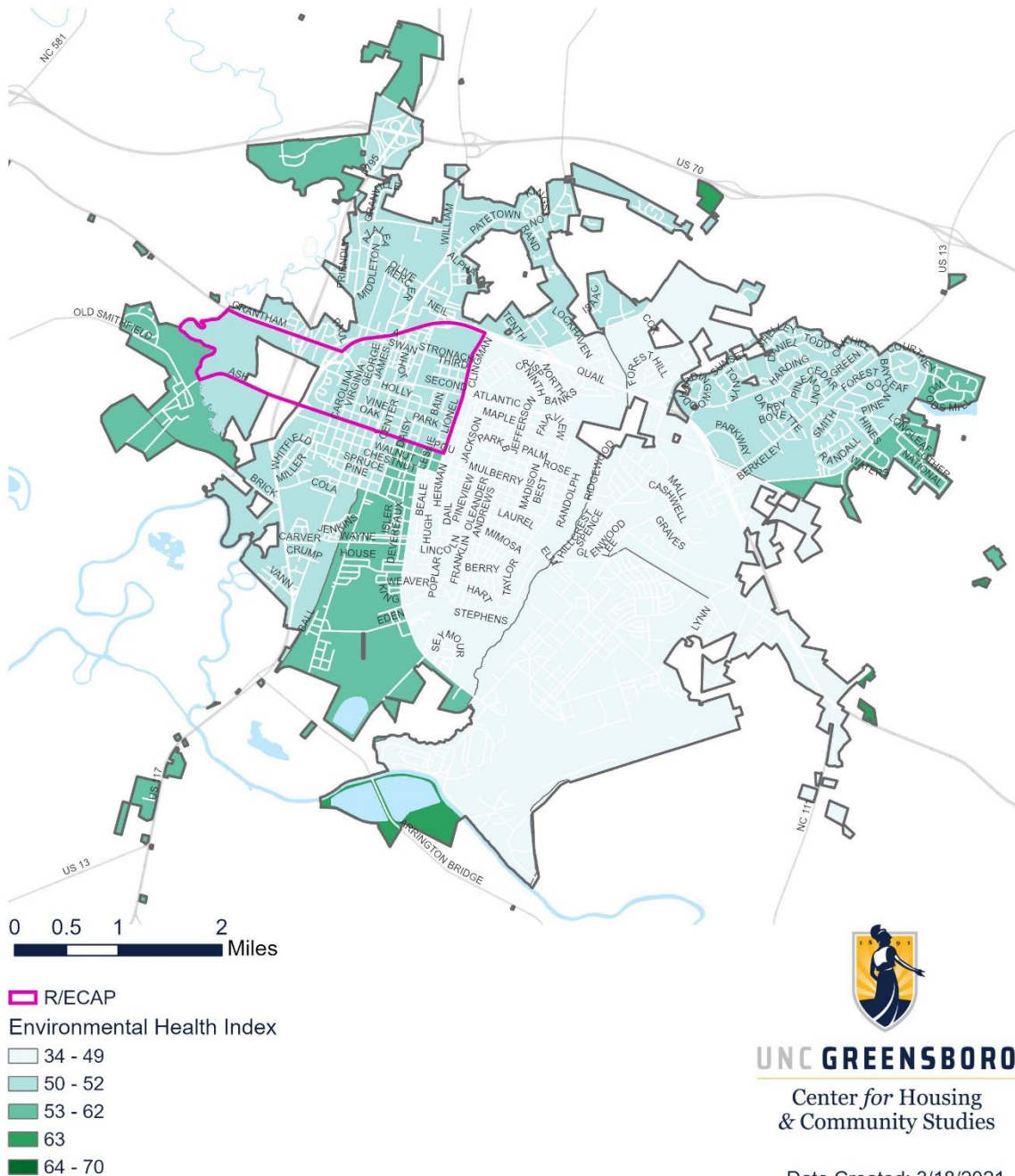


Figure 34 –Environmental Health Index 2020 (AFFHT0006)



# FAIR HOUSING COMPLAINTS & COURT FILINGS

## Fair Housing Complaints

Fair housing complaint data covering the last five and a half years (January 1, 2015 to June 23, 2020) were requested from the U.S. Department of Housing and Urban Development, Region IV Office of Fair Housing and Equal Opportunity. There were three cases: two were generated through the Community Relations Department and one filed directly with HUD. One case was for familial status and race, one for race alone, and one for disability. Issues included refusal to rent; discriminatory terms, conditions, privileges, or services and facilities; discriminatory acts under Section 818 (coercion, Etc.), and failure to make reasonable accommodation. Two cases reached conciliation/settlement successfully and one was found to have no cause. For comparison, in the previous five-year period (2009-2014) there were eleven complaints. This decline in cases may indicate a need for review of the local complaint process as well as the need for more pro-active engagement

with the community regarding fair housing issues.

## Housing-Related Court Filings

A review of five years of data on civil legal claims was conducted for Wayne County (District 8). The district had a total of 19,650 civil cases from the year 2015 to 2019, or an average total of 3,930 cases per year. The County disposed of 19,022 civil cases across all case types. Case dispositions were in part dictated by which court handled the case. Case issue types, court types, and dispositions were observed. The majority of cases were for summary ejectments (evictions) and foreclosures. There were no cases of unlawful discriminator housing practices found in the civil court records of the district between 2015 and 2019.

Housing related cases included 2,021 Summary Ejectment cases on average per year in the county. This was the leading type of civil claim. Other housing-related civil claims included 421 foreclosures annually.



**Table 52 – Fair Housing Complaints Wayne County 2015-2020**

Case Number - HUD	HUD/ Local	Violation City	Violation County	Violation State	Filing Date	Closure Date	Bases	Issues	Case Disposition	All Compensation and Victims Fund Amount
<b>04-15-0729-8</b>	Community Relations Department	Goldsboro	Wayne	North Carolina	06/08/15	12/18/15	Race, Familial Status	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	\$0
<b>04-17-9344-8</b>	Community Relations Department	Goldsboro	Wayne	North Carolina	08/23/17	06/05/18	Race	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	\$0
<b>04-19-6864-8</b>	HUD	Pikeville	Wayne	North Carolina	05/03/19	09/04/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	\$0

**Table 53 - Annualized Incidence by Issue Types – Civil Claims (NCAOC 2020)**

<b>Issue</b>	<b>District</b>	<b>Magistrate</b>	<b>Superior</b>	<b>Estate</b>	<b>Special Proceedings</b>
<b>Summary Ejectment</b>	31	1,990	-	-	-
<b>Divorce</b>	477	-	-	-	-
<b>Collection on Account</b>	432	-	8	-	-
<b>Domestic Violence</b>	254	-	-	-	-
<b>Foreclosure</b>	-	-	-	-	250
<b>Custody</b>	204	-	-	-	-
<b>Findings and Order of Foreclosure</b>	-	-	-	-	171
<b>Permanent Civil No-Contact Order</b>	107	-	-	-	-
<b>Incompetency</b>	-	-	-	-	83
<b>Guardianship of the Person</b>	-	-	-	56	-
<b>Claim/Designate Exempt Property</b>	21	4	1	-	-
<b>Name Change</b>	-	-	-	-	24
<b>Limited Driving Privilege</b>	8	-	-	-	-
<b>General Guardianship - Incompetent</b>	-	-	-	8	-
<b>Estate Guardianship - Incompetent</b>	-	-	-	7	-
<b>Temporary Restraining Order</b>	4	1	3	-	-
<b>Protective Services - Adult</b>	-	-	-	-	5
<b>Renew Permanent Restraining Order</b>	4	-	-	-	-
<b>General Guardianship - Minor</b>	-	-	-	1	-
<b>Renewal of Permanent Civil No-Contact</b>	1	-	-	-	-
<b>Objection to Exemptions Claimed</b>	-	< 1	-	-	-
<b>Domestic Violence Temp Child Support</b>	-	-	-	-	-
<b>Domestic Violence Temporary Custody</b>	-	-	-	-	-
<b>Power of Attorney</b>	-	-	-	-	-
<b>Permanent Restraining Order</b>	-	-	-	-	-
<b>Unlawful Discriminatory Housing Practice</b>	-	-	-	-	-

# PUBLIC FEEDBACK

## Resident Survey

### *Respondent Characteristics*

The Goldsboro ConPlan and AI Resident Survey was conducted by the Community Relations Department of the City of Goldsboro. Data was provided to UNCG CHCS in the form of results from the Survey Monkey website. The data herein is significantly limited as there was no sampling frame or methodological controls to estimate statistical impact. UNCG CHCS has processed the data as it was provided but recommends that a statistically accurate survey with rigorous research methodology be employed in the future.

The survey was advertised on the Community Relations Website and on social media. It had a total of 39 respondents. Nearly all (92.3%) live in the City of Goldsboro. Most respondents live in 27530 zip code (62.1%) and 27534 (27.6%), with only a few respondents from 27533 (3.4%), 27830 (3.4%), and 28333 (3.4%). Respondents ranged from 32 years old to 68 years old, (averaging 51.1 years). Three-quarters (77.8%) were female. Two-fifths



**Figure 35 - Advertisement for Survey**

(42.9%) of respondents were white, (35.7%) identified as African American, and 21.5% were multi-racial. Most of the respondents reported only one (31.0%) or two (27.6%) persons living in the household, and the majority selected living alone or in a related family household with spouse/partner and children. Two-fifths (44.8%) live with children in the household. Respondents on average had lived in Goldsboro for 26.2 years with a range from one year to more than fifty years. A little over a third (37.9%) of respondents were employed full-time, while a quarter (24.1%) were retired. A tenth were unemployed (10.3%), disabled (10.3%), or homemakers (10.3%). Respondents self-reported their household income with most falling between \$20,000 and \$75,000.

### ***Housing Status***

The majority of the respondents to the survey are homeowners (64.1%). Male respondents were more likely to be homeowners than females and White respondents more likely than African American respondents to own homes. Three-quarters (76.9%) live in single-family homes, 12.8% live in apartment, 7.7% live in townhomes, and 2.6% in mobile home or manufactured homes.

***Table 54 - Current Housing***

Current Housing	% of Cases
I live in public housing or project-based Section 8 housing	50.0%
My rent is based on my income	33.3%
I have a Section 8 or housing choice voucher	16.7%
The sale of my home is restricted by the program I bought it through	16.7%

Respondents were asked what factors were most important in choosing a home. The top three factors included cost (74.4%), neighborhood (33.3%), proximity to work (28.2%), and low crime rate (28.2%). Respondents were also asked what challenges they experience in their neighborhoods. "Poor/low school quality in my neighborhood" was the top challenge followed by "Inadequate infrastructure," and inability to afford a down payment.

***Table 55 - Current Housing Situation by Sex & Race***

Sex/Race	Homeowner	Renter	Shelter	Total
Male	83.3%	16.7%	0.0%	6
Female	57.1%	38.1%	4.8%	21
White	66.7%	33.3%	0.0%	12
African American	30.0%	60.0%	10.0%	10
Multi-racial	100.0%	0.0%	0.0%	5
Other	100.0%	0.0%	0.0%	1

### ***Public Assistance***

There were six (15.8%) respondents who lived in publicly assisted or deed-restricted housing. About half indicated they live in public housing or project based on Section 8 housing. About a third have rent based on income. Only three respondents have a Section 8 or housing choice voucher. They said they had somewhat or very difficult time finding a landlord to accept the voucher. The reasons for such difficulty were either not enough landlords accept vouchers, or the voucher was insufficient to cover the entire rent.

### ***Neighborhood Characteristics***

Respondents were asked to rate their levels of agreement/disagreement on a series of statements about their current living environment. These statements covered nearly all major aspects that can be related to one's neighborhood. Respondents' opinions on neighborhoods varied greatly.

**Table 56 - Top Three Factors Choosing Home**

Factors	% of Cases
Cost I could afford it	74.4%
Like the neighborhood	33.3%
Close to work/job opportunities	28.2%
Low crime rate/safe	28.2%

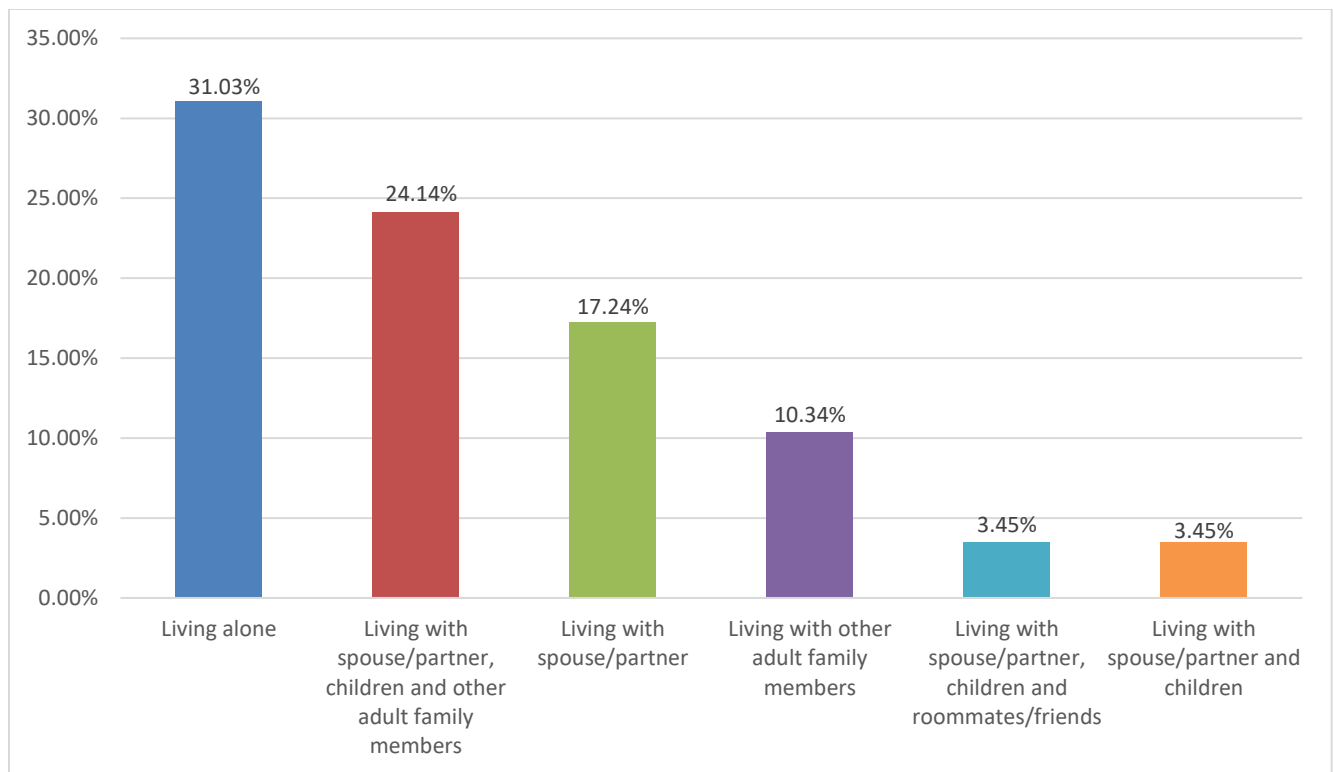
Out of the 31 respondents, three-quarters (75.0%) said it was not easy to find affordable housing near good schools. More than half disagree (58.1%) with the statement that all neighborhoods in their area have the same quality of parks and recreation. Likewise, 62.5% disagree with the statement that their neighborhoods had lower crime. When it came to proximity of job opportunities 59.4% disagreed that jobs were close to where they live. There was a great deal of variance on perception of housing condition. On average, respondents agreed that health care facilities were close to where they live (62.5% agree). A majority of respondents (65.6%) agreed that they

have supportive friends in their community. Three-quarters of respondents (75.0%) expressed that they agree that grocery stores are close to where they live and 84.4% agreed that they can easily get to places with their preferred form of transportation.

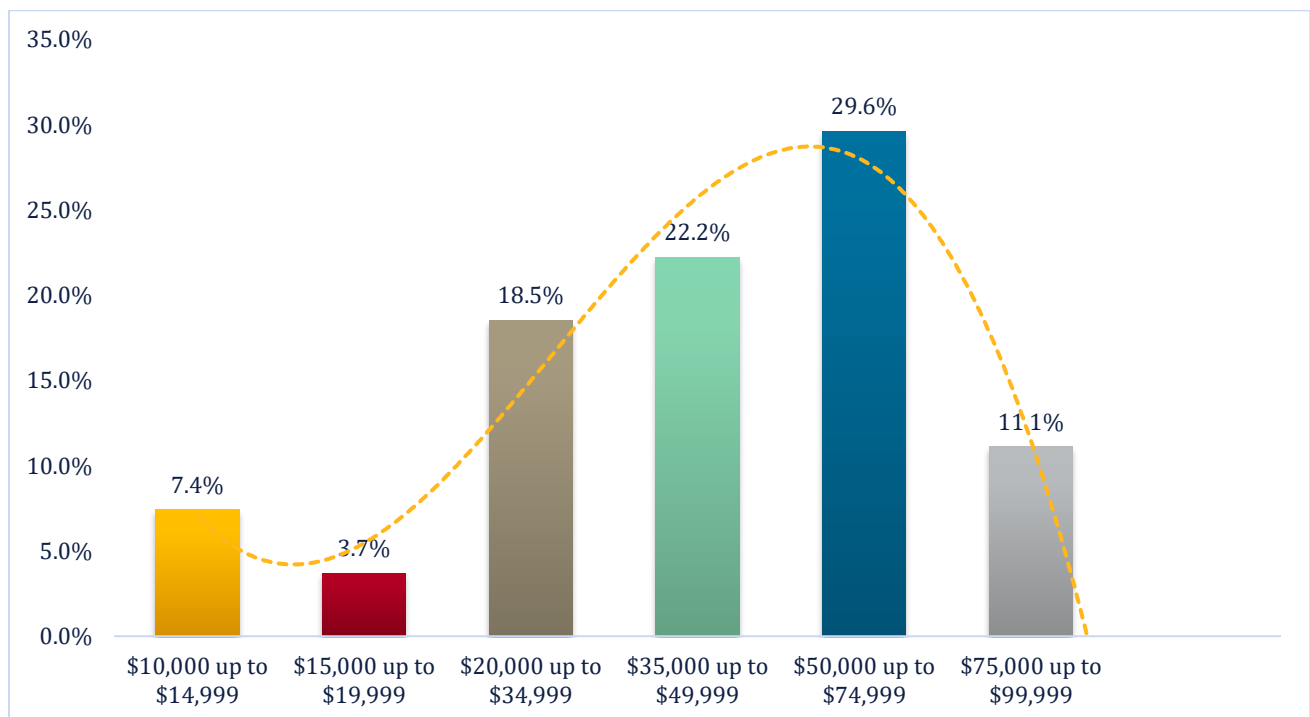
Respondents were asked their perception of acceptance in the neighborhoods in Goldsboro. Nearly half 47.3% "strongly disagree" or "disagree" indicating that they felt unwelcome in all neighborhoods. In follow-up analysis on the reasons for feeling unwelcome, four broad issues were noted with racism being by far the most prevalent (75.0%). For example, one respondent noted, "Black families are not fully welcome as neighbors in many neighborhoods or schools." Other reasons included related income exclusions, problem schools, and neighborhood crime.

**Table 57 - Challenges in Current Living Situation**

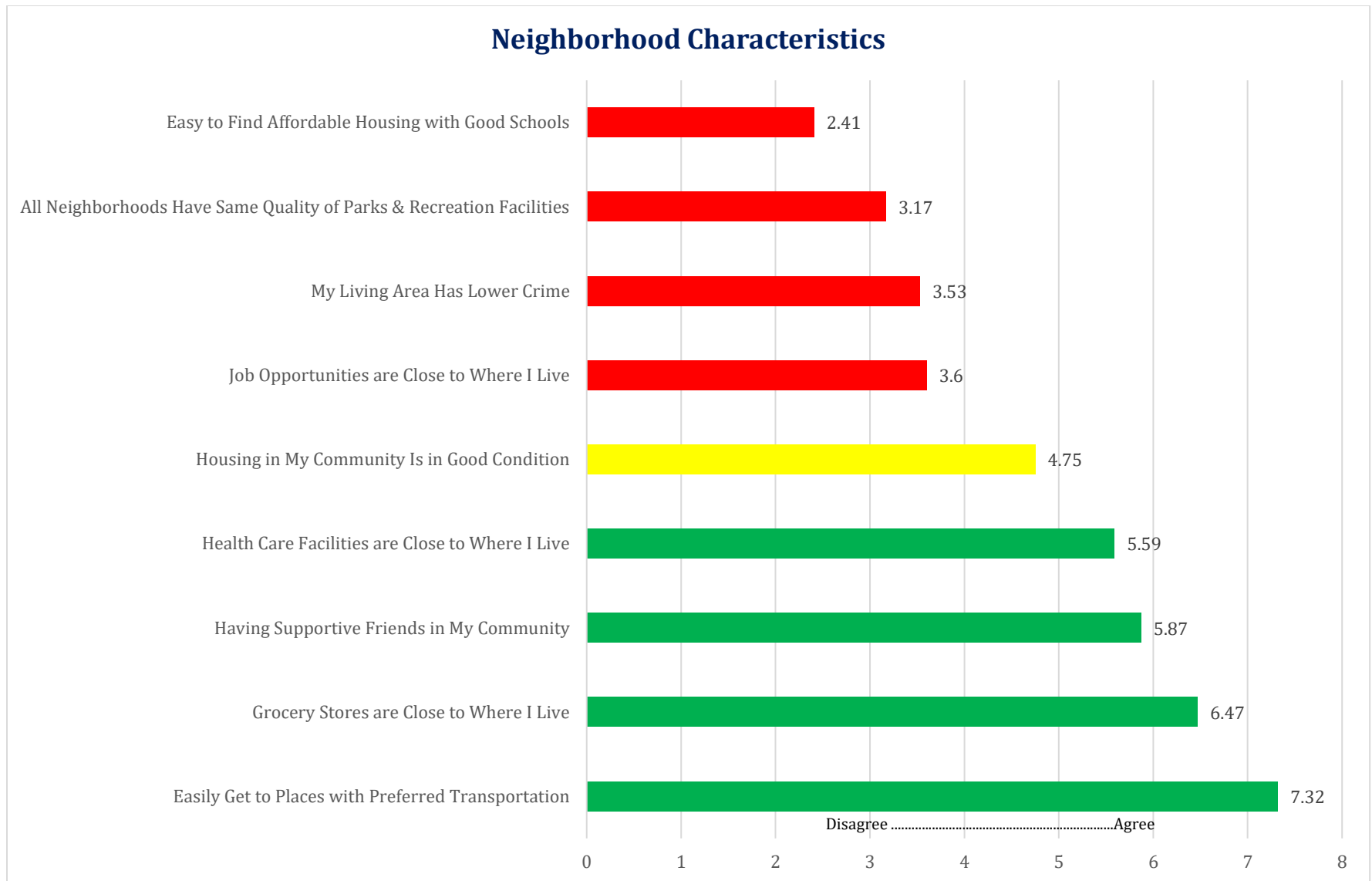
Challenges	% of Cases
Poor/low school quality in my neighborhood	36.7%
Inadequate sidewalks, streetlights, drainage, or other infrastructure in my neighborhood	30.0%
I want to buy a house but can't afford the down payment	26.7%
I worry about my rent going up to an amount	23.3%
Too much traffic/too much street/highway noise	20.0%
Buildings in my neighborhood are in poor condition	20.0%
I have bad/rude/loud neighbors	20.0%
High crime in my neighborhood	20.0%
Not enough job opportunities in the area	20.0%
My home/apartment is in poor condition	16.7%



**Figure 36 – Household Characteristics**

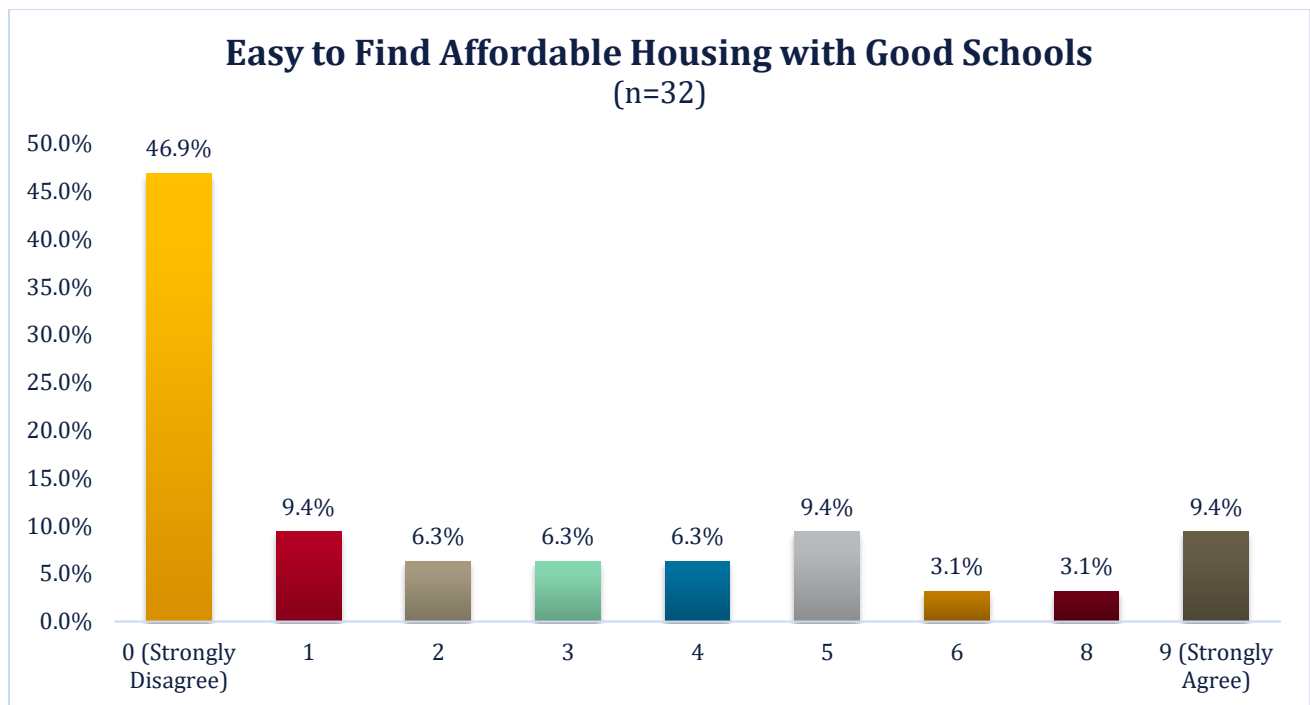


**Figure 37 - Household Income**

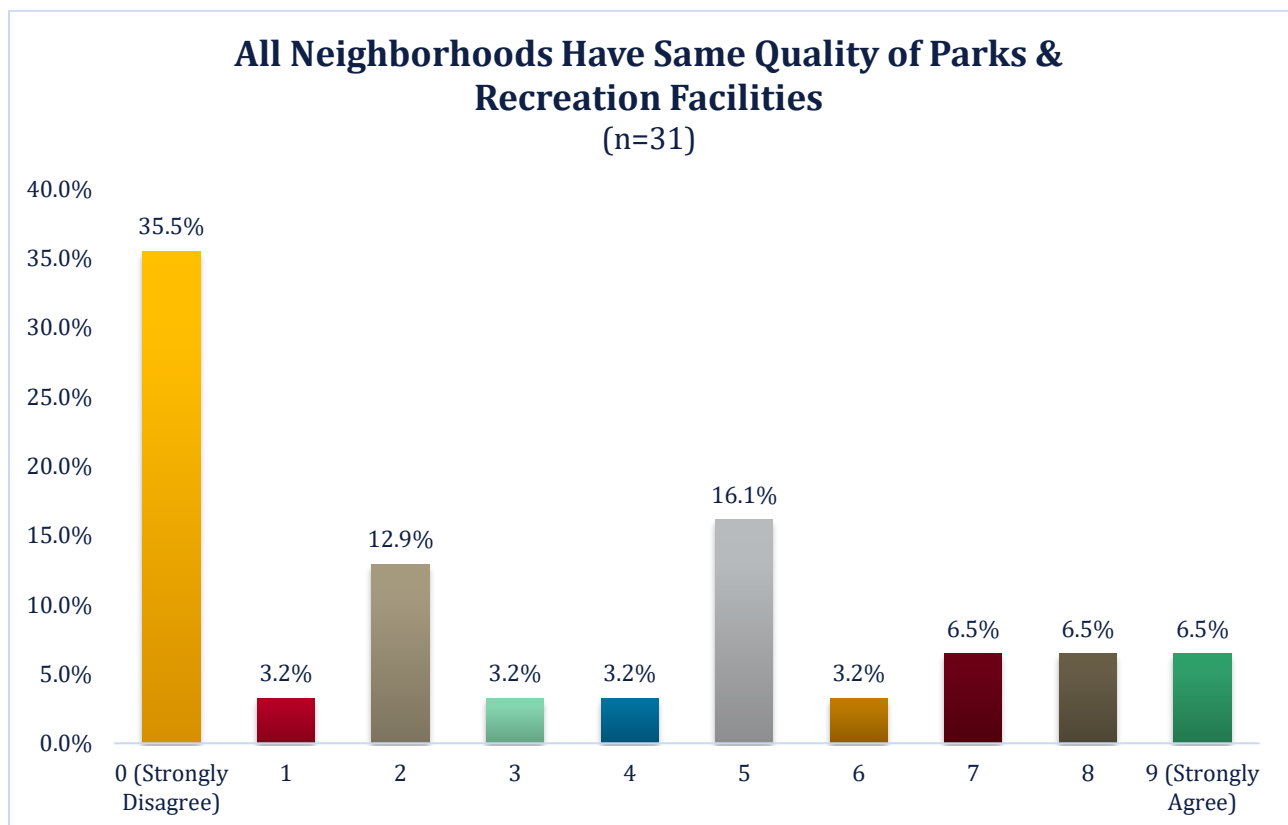


**Figure 38 - Comparison of Responses for Neighborhood Characteristics (mean scores)**

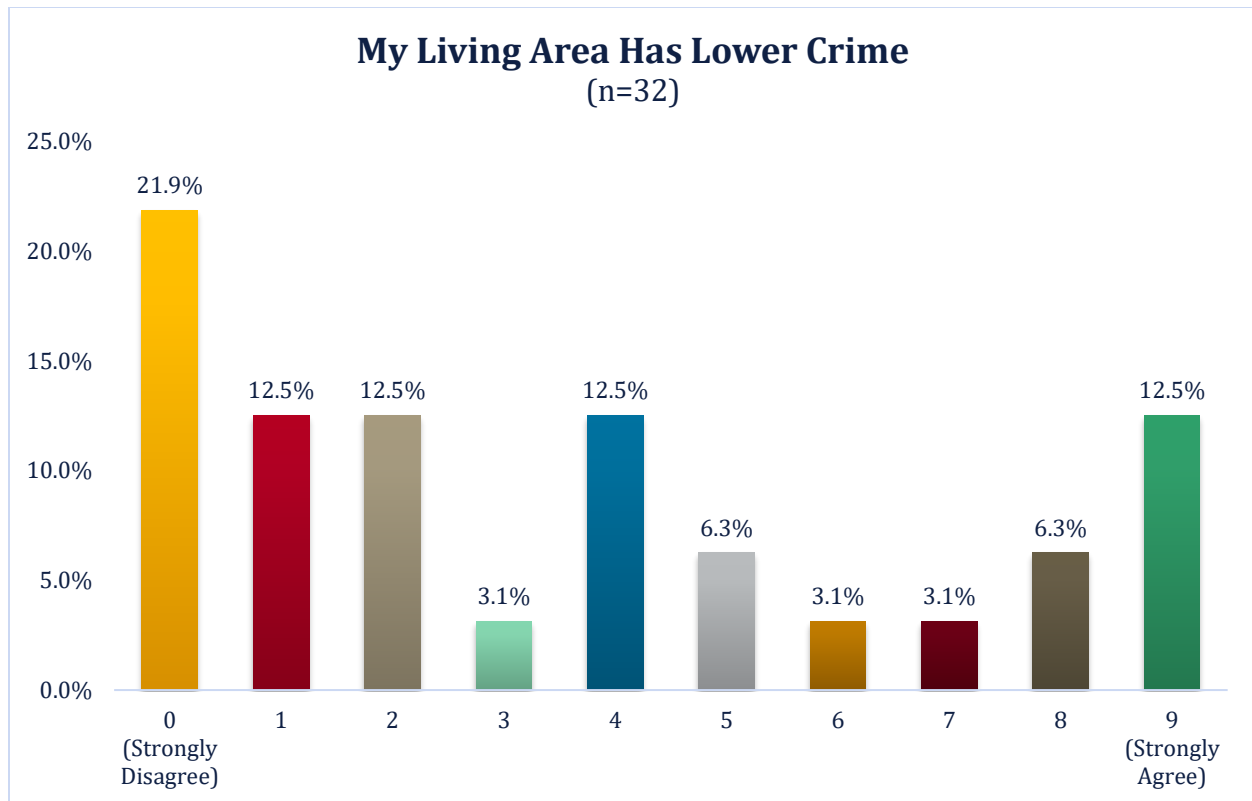




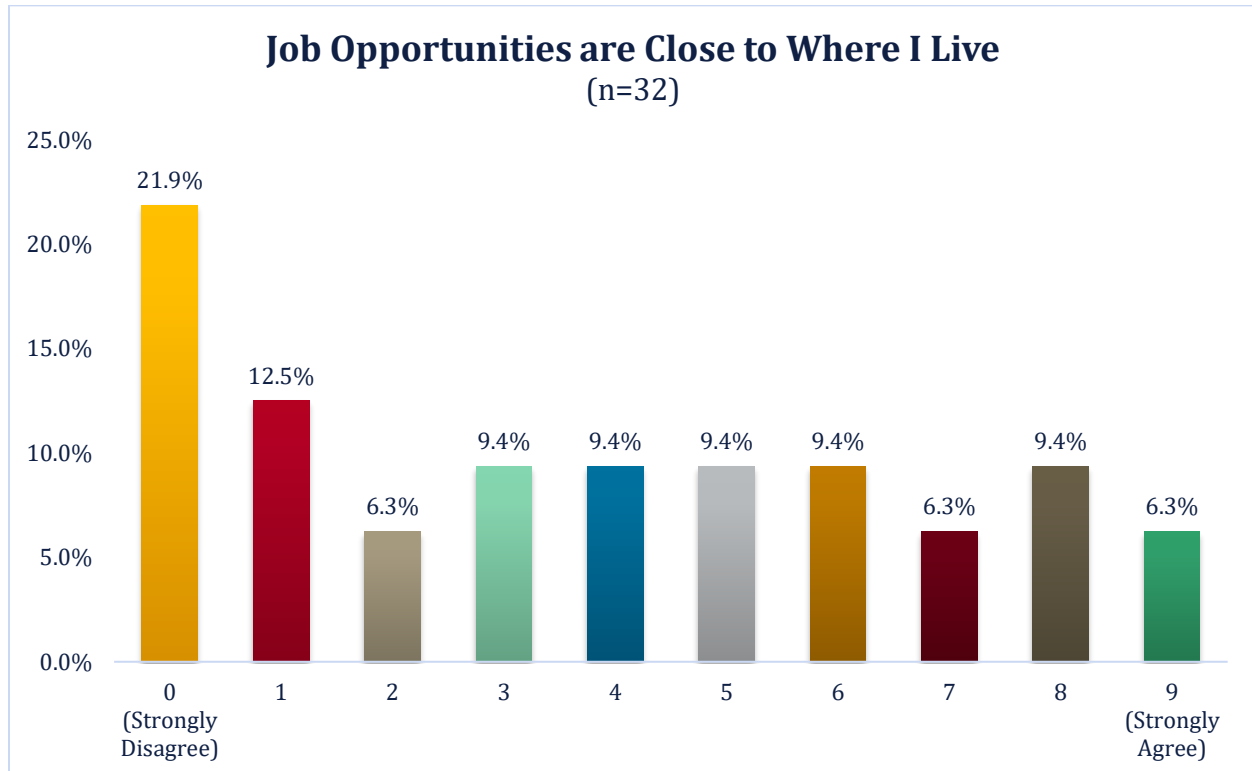
**Figure 39 - Affordable Housing with Good Schools**



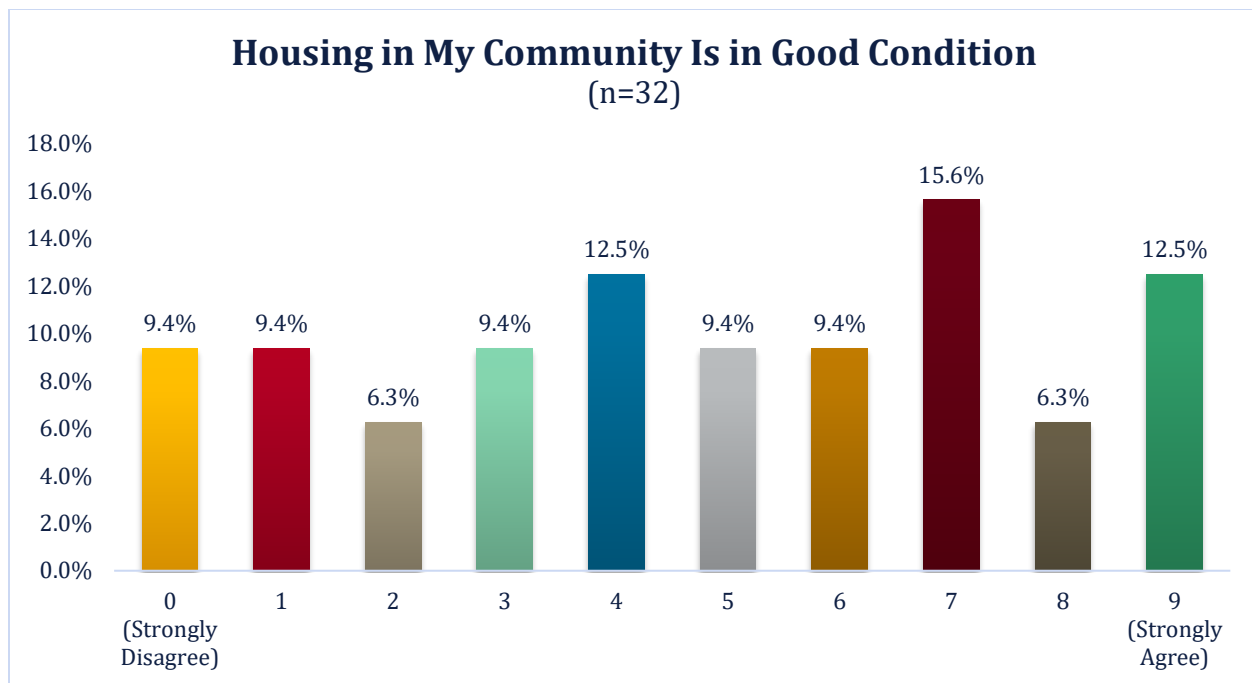
**Figure 40 - Same Quality of Parks & Recreation Facilities**



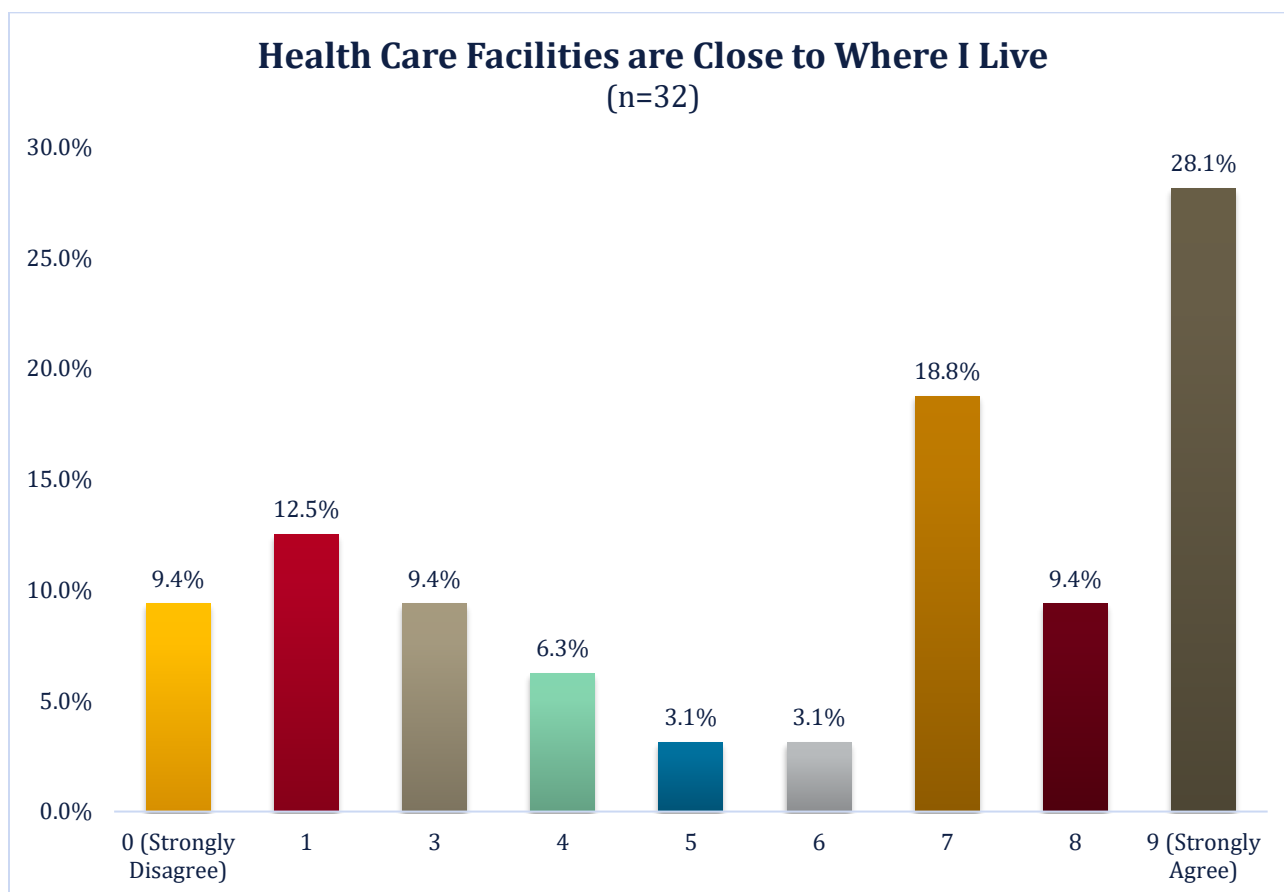
**Figure 41 - Lower Crime in Communities**



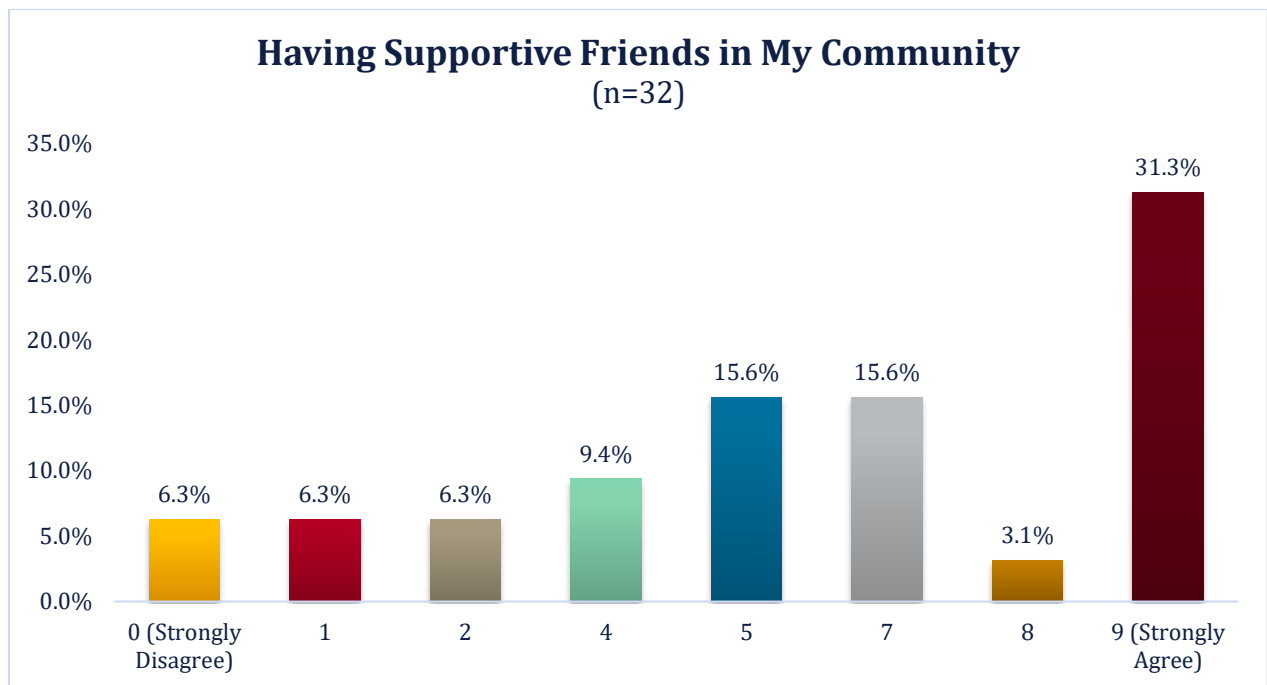
**Figure 42 - Job Opportunities to Living Place**



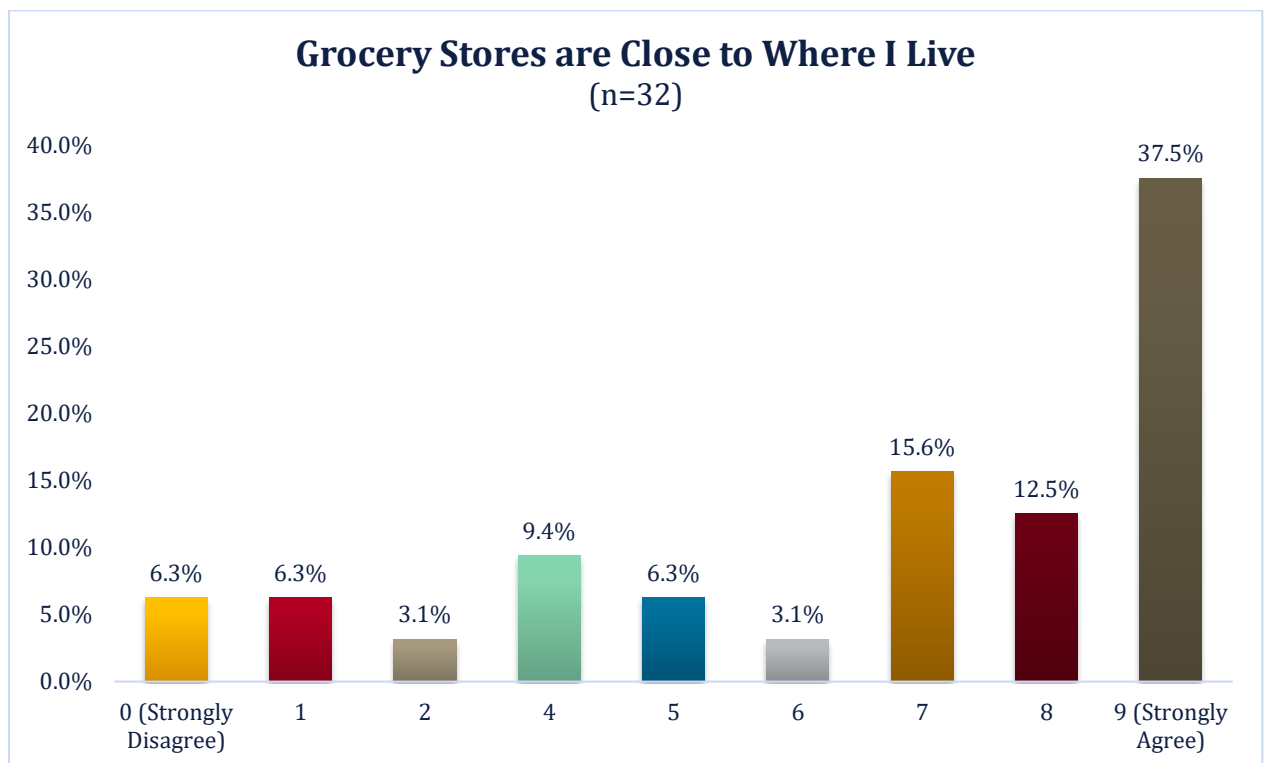
**Figure 43 - Housing Condition in Community**



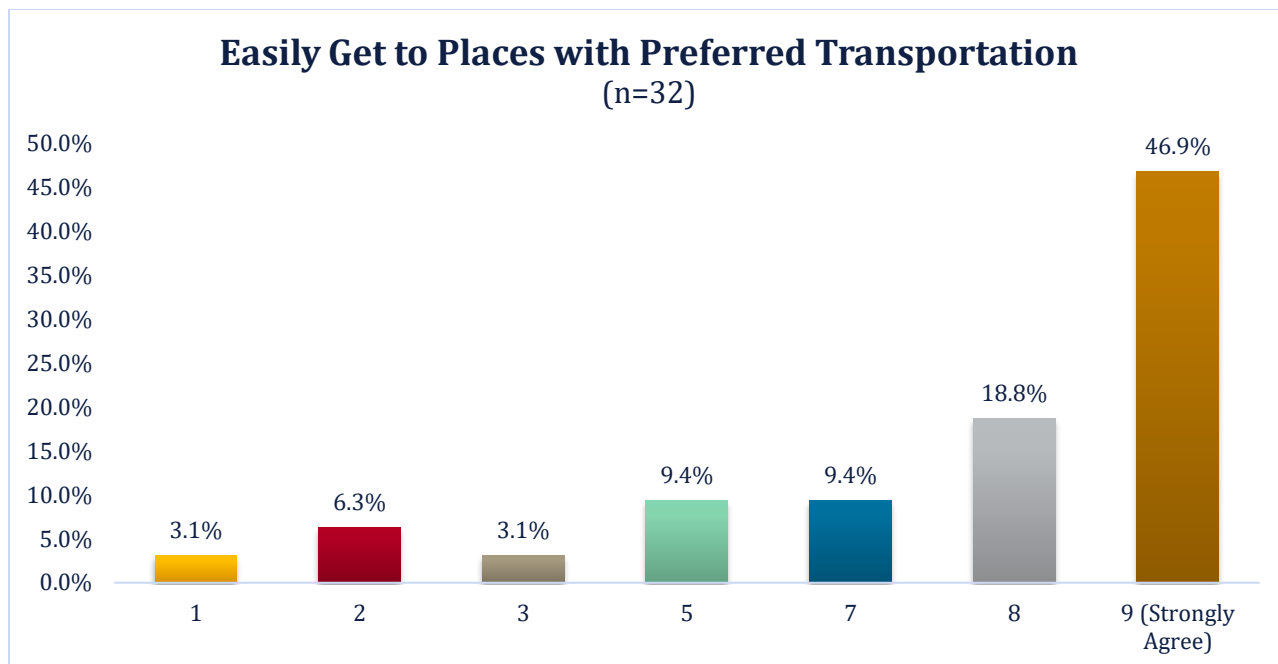
**Figure 44 - Convenience of Health Care Facilities**



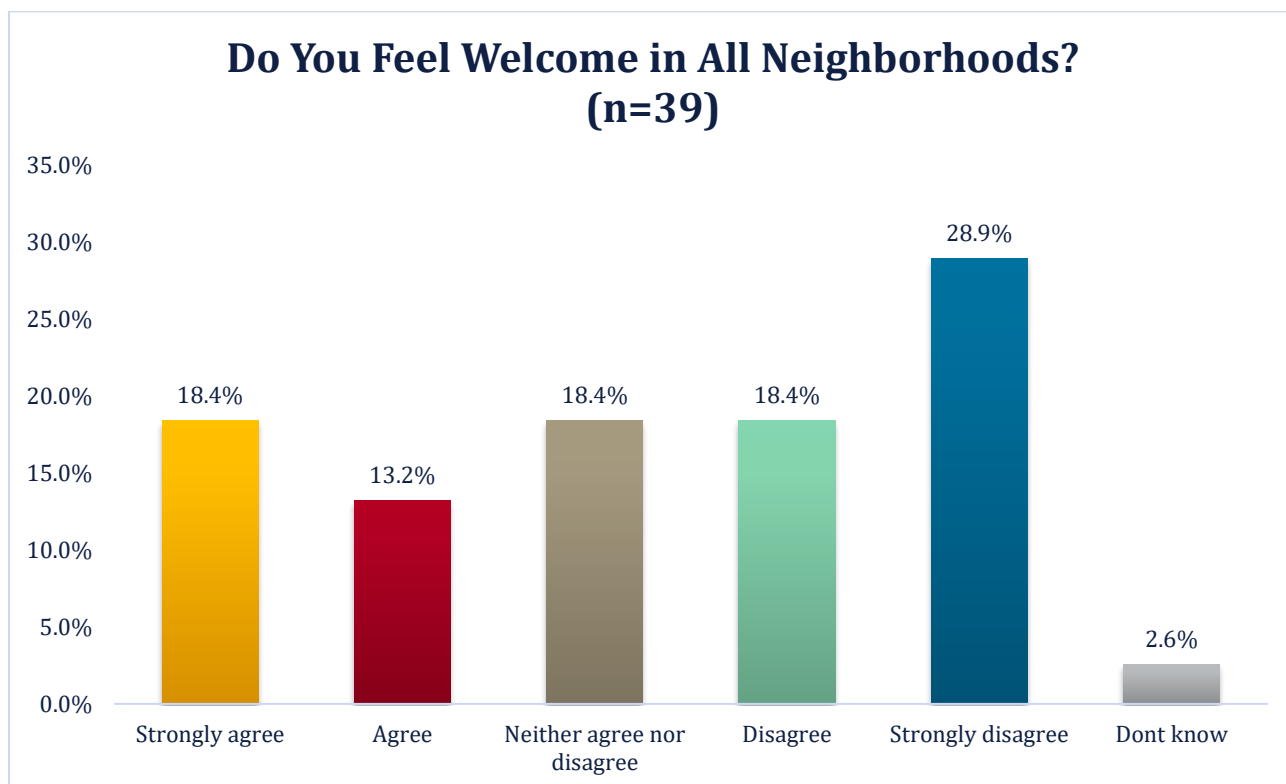
**Figure 45 - Supportive Friends in Communities**



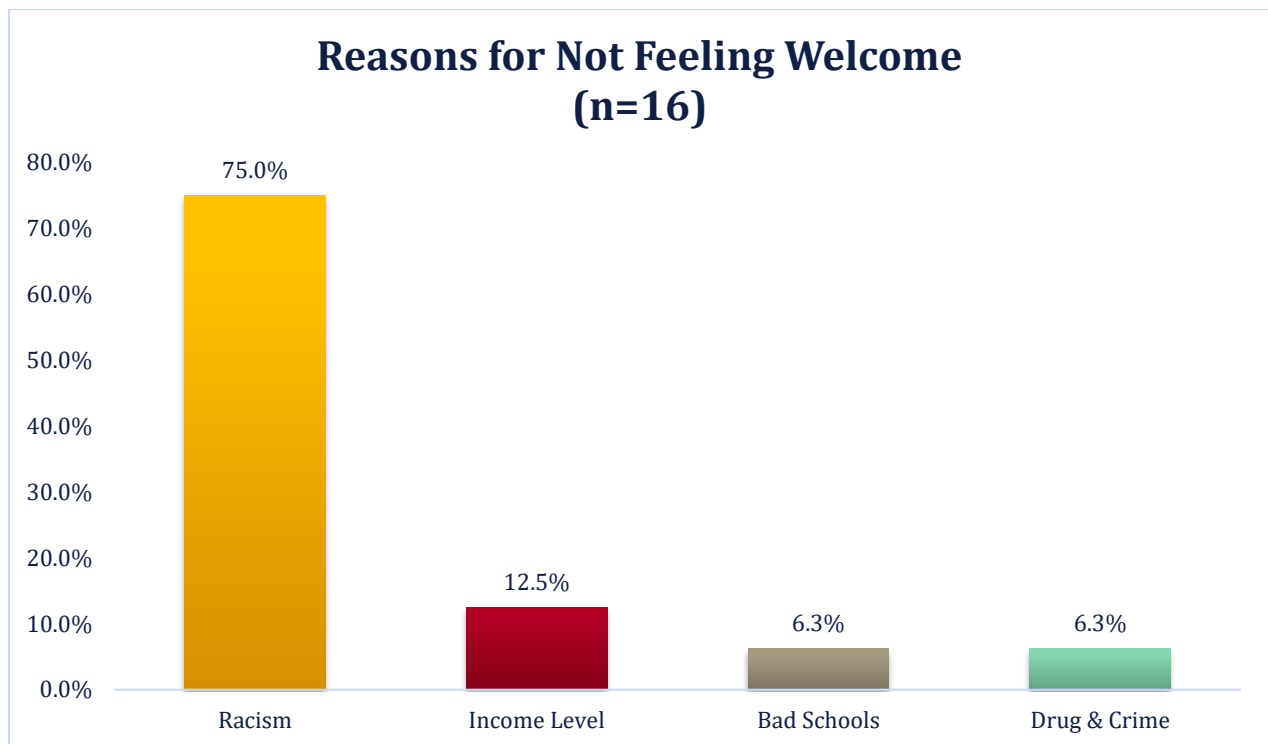
**Figure 46 - Convenience of Grocery Store**



**Figure 47 - Convenience of Transportation**



**Figure 48 - Do Residents Feel Welcome in Neighborhoods?**



**Figure 49 - Reasons for Not Feeling Welcome**

**Table 58 - Reasons for Moving Out of Current Place**

Move Reasons	% of Cases
Bigger house/apartment/more bedrooms	70.6%
Want to move to a different neighborhood	58.8%
Want to buy a home	52.9%
Crime/safety reasons	47.1%
Be closer to better schools	29.4%
Want to move to different city/county	17.6%
More walkable/bikeable area	17.6%
Better job opportunities	17.6%
Save money/get something less expensive	11.8%
Need more accessible unit or house	11.8%
Closer to family	5.9%
My neighborhood is changing/gentrifying and I no longer feel welcome	5.9%



### ***Intentions to Move***

There was a nearly equal split between residents wanting to move out of their homes (51.4%) and those wanting to stay (48.6%). Of those wanting to move, 70.6% wanted a bigger house/ apartment/ more bedrooms; 58.8% wanted to move to a different neighborhood; 52.9% wanted to buy a house; and 47.1% wanted to move for crime/safety reasons.

Most respondents (82.1%) to this survey have not moved in the last five years. The top three reasons for staying in place included that they can't afford to live anywhere else (53.3%); they can't find a better place to live (40.0%); and they can't pay moving expenses-security deposit, first/last month rent, pet deposit (40.0%).

Only 17.9% (n=7) Goldsboro respondents reported that they had moved in the last five

years. The reasons for having to move out can be summarized in three broad categories. First is economic reasons such as getting evicted due to being late on rent. Second is housing issues such as mold, unsafe conditions, or natural disaster like flooding. Finally, some moved due to the landlord selling the home or the landlord wanting to use the residence. Of those who moved, one had children who had to change schools, three had children who remained in their school, and three didn't have school aged children.

### ***Experiences with Housing Search***

When residents were looking for housing to rent or buy in Goldsboro in past five years, 8 of 27 (29.6%) respondents reported that they have been denied housing. The denials were examined by demographic characteristics with African American and female respondents having higher reports of

***Table 59 - Reasons for Not Moving Out***

Why Not Move	% of Cases
Can't afford to live anywhere else	53.3%
Can't find a better place to live	40.0%
Can't pay moving expenses-security deposit, first/last month rent, pet deposit	40.0%
Rentals are all full; can't find a place to rent	20.0%
Job is here	13.3%
Family/friends are here	13.3%
Need to find a new job	6.7%
Can't find a landlord to rent to me due to my credit history/eviction or foreclosure history	6.7%
Have submitted applications, but haven't secured housing	6.7%

being denied proportionally. Respondents explained that the reasons for denial included "income too low" (85.7%) and "bad credit" (71.4%) as the leading reasons.

Of those who had been denied housing, (57.1% or five out of eight) revealed that they had encountered a situation where bank or other lender would not offer them a loan. Two of eight denied housing had a landlord who did not return calls asking about a unit. Two of eight denied housing were told a unit was available over the phone, but when they showed up in person, the landlord told them it was no longer

available. Two of eight denied housing were only shown homes in neighborhoods where most people were of the same race or ethnicity as they were (aka steering). Likewise, two of eight denied housing said a bank or other lender charged them a high interest rate on their home loan.

### ***Perspectives on Housing Issues***

Respondents were asked a series of questions regarding openness in their neighborhood to groups with protected statuses. Nearly all respondents (91.7%) were not supportive of locating a residential

***Table 60 - Ever Denied by Sex & Race***

Sex/Race	Not Ever Denied	Ever Denied	N/A	Total
Male	50.0%	16.7%	33.3%	6
Female	42.9%	23.8%	33.3%	21
White	41.7%	16.7%	41.7%	12
African American	30.0%	40.0%	30.0%	10
Multi-racial	80.0%	20.0%	0.0%	5
Other	0.0%	0.0%	100.0%	1

***Table 61 - Reasons for Being Denied***

Denial Reasons	% of Cases
Income too low	85.7%
Bad credit	71.4%
Size of my family/household; too many people	28.6%
Landlord didn't allow pets	28.6%
Eviction history	14.3%
I have children	14.3%
Service animal/assistance animal/therapeutic animal	14.3%
Lack of stable housing record	14.3%

***Table 62 - House Searching Experience***

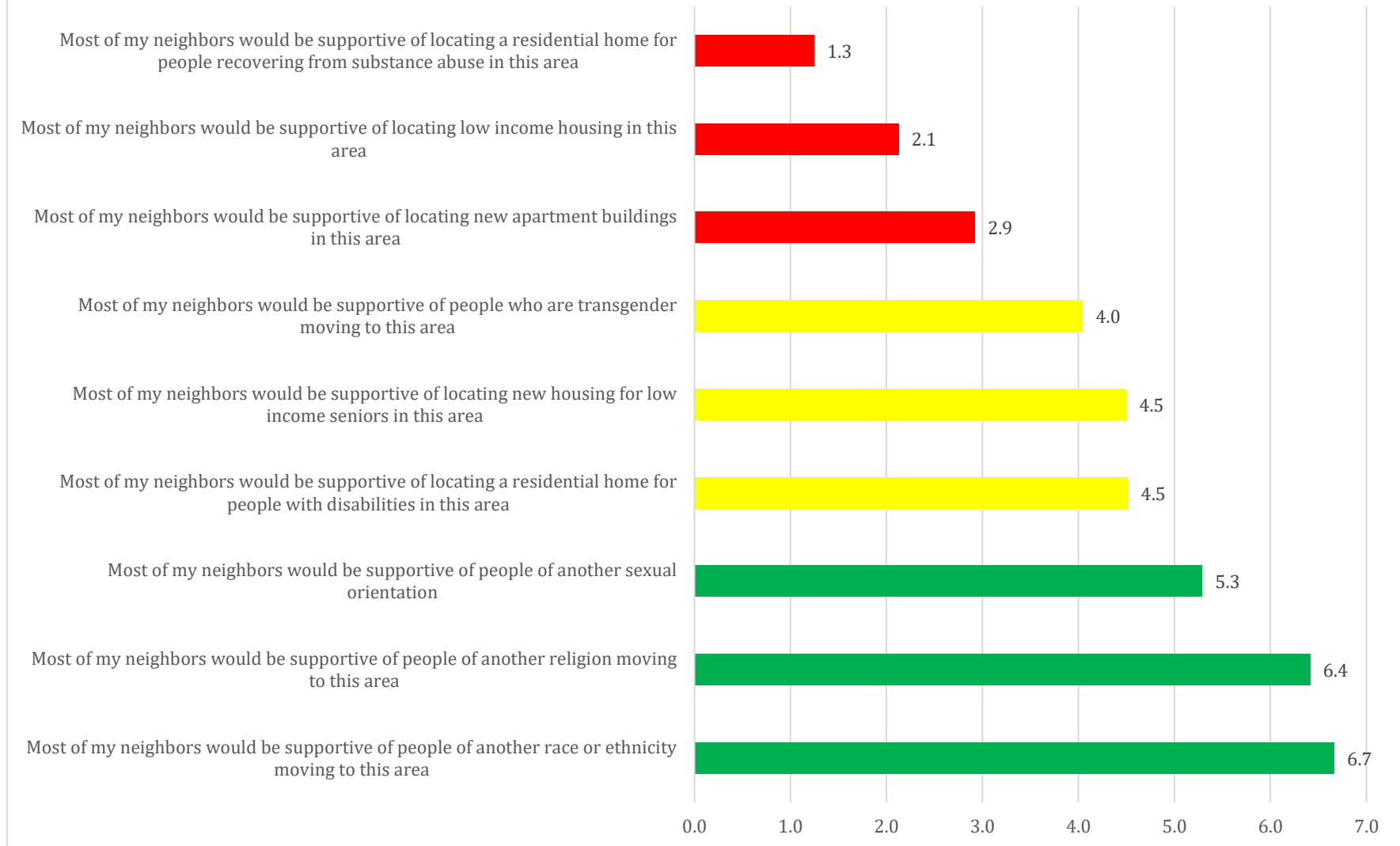
House Seeking Experience	% of Cases
A bank or other lender would not give me a loan to buy a home	57.1%
Landlord did not return calls asking about a unit	28.6%
I was told the unit was available over the phone, but when I showed up in person, the landlord told me that it was no longer available	28.6%
The real estate agent only showed me homes in neighborhoods where most people were of the same race or ethnicity/suggested only neighborhoods where most of the people were of my same race or ethnicity	28.6%
A bank or other lender charged me a high interest rate on my home loan	28.6%
Landlord did not return emails asking about a unit	14.3%
I requested a disability accommodation for myself or my family and it was not made	14.3%

home for people recovering from substance abuse in their neighborhoods. Similarly, 78.3% didn't support locating low income housing and 65.4% were not supportive of locating new apartment buildings in their neighborhoods. Respondents were more split in their support for people who are transgender (52.4% disagree); new housing for low income seniors (42.3% disagree); or a residential home for people with disabilities in their neighborhoods (44.4% disagree). Respondents were more in support of people of another sexual orientation (66.6% agree); people of another religion (79.2% agree); or people of another race or ethnicity moving to their neighborhoods (87.5%).

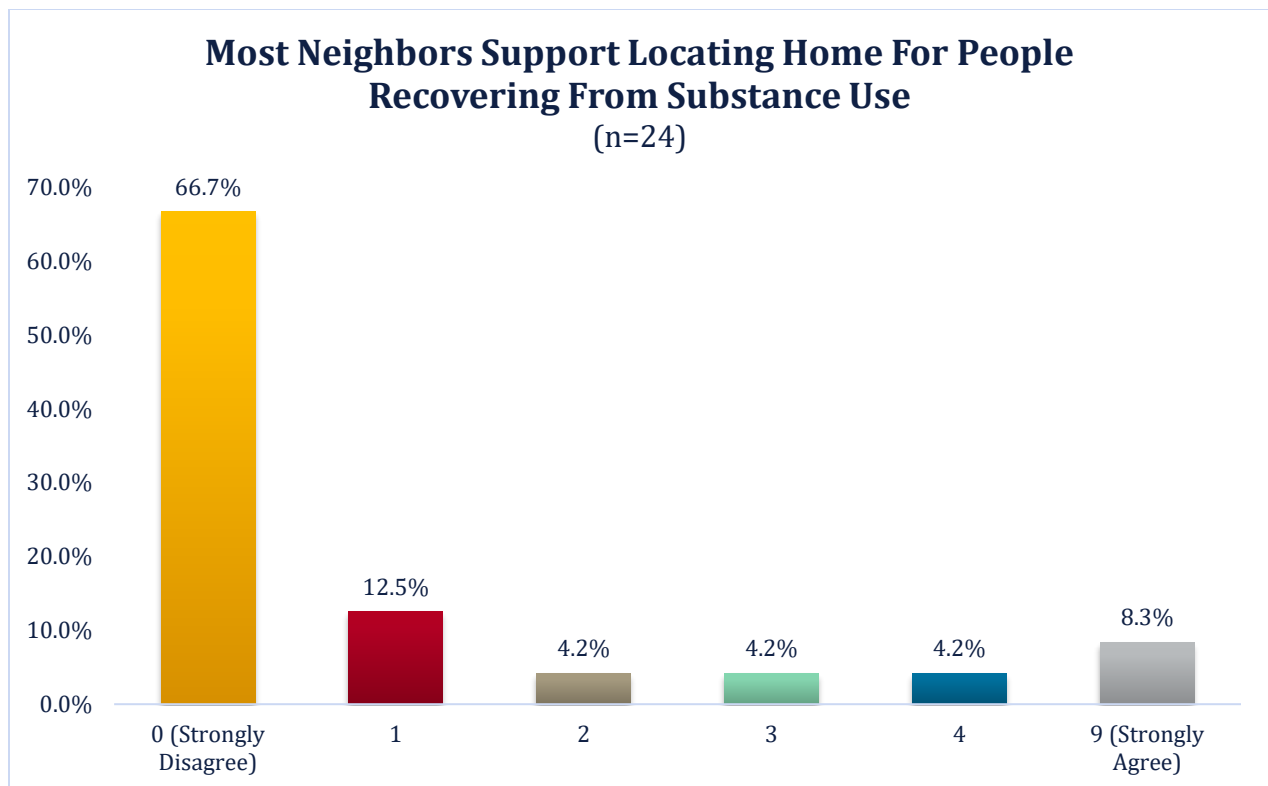
### ***Housing Issues - Disabilities***

About a third of the respondents (30.0%) reported having family member(s) with a disability, yet only three respondents reported that their house or apartment did not meet the needs of their household member with a disability. Those needs included: needing grab bars in the bathroom, having reserved accessible parking spots, allowing service or emotional support animal, and having wider doorways. Respondents offered some insights regarding how to help the person with a disability to acquire various kinds of resources. For example, one participant said part time jobs with no standing requirement

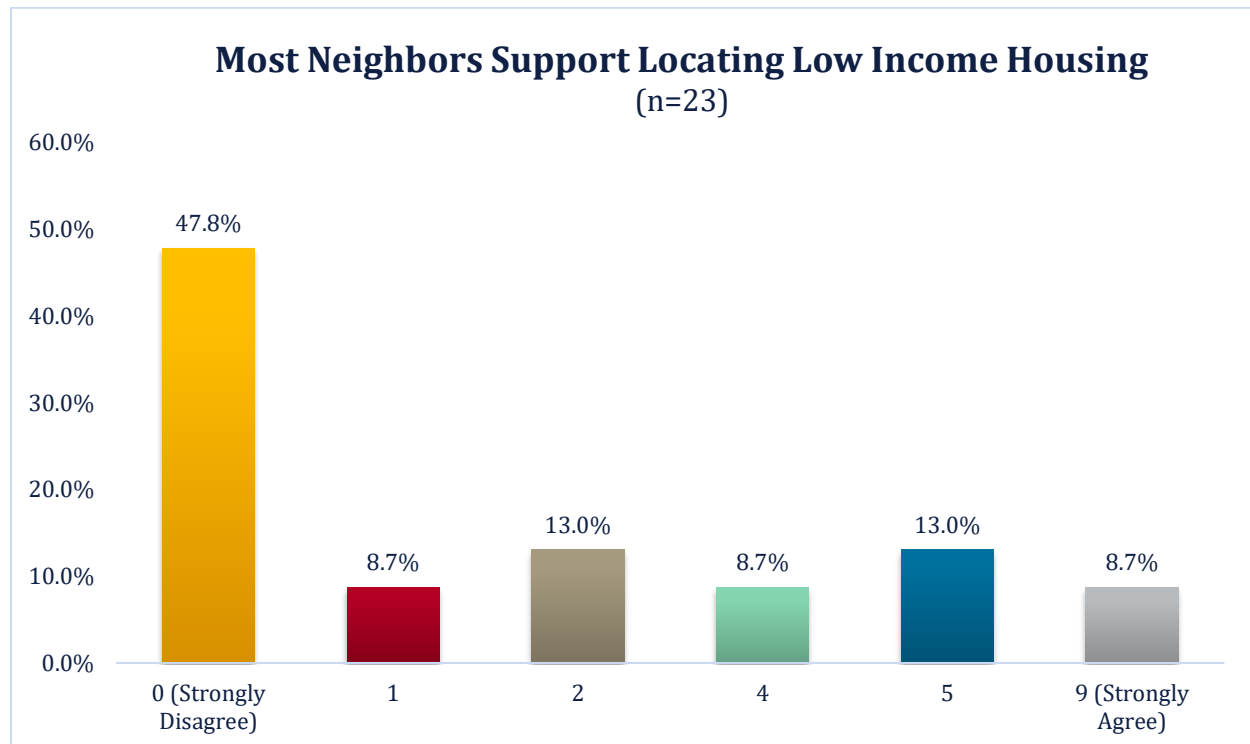
## Neighborhood Attitudes Toward Affordable Housing



**Figure 50 - Neighborhood Attitudes Toward Affordable Housing**



**Figure 51 - Neighbors Support Locating Home for People Recovering from Substance Use**



**Figure 52 - Neighbors Support Locating Low Income Housing**

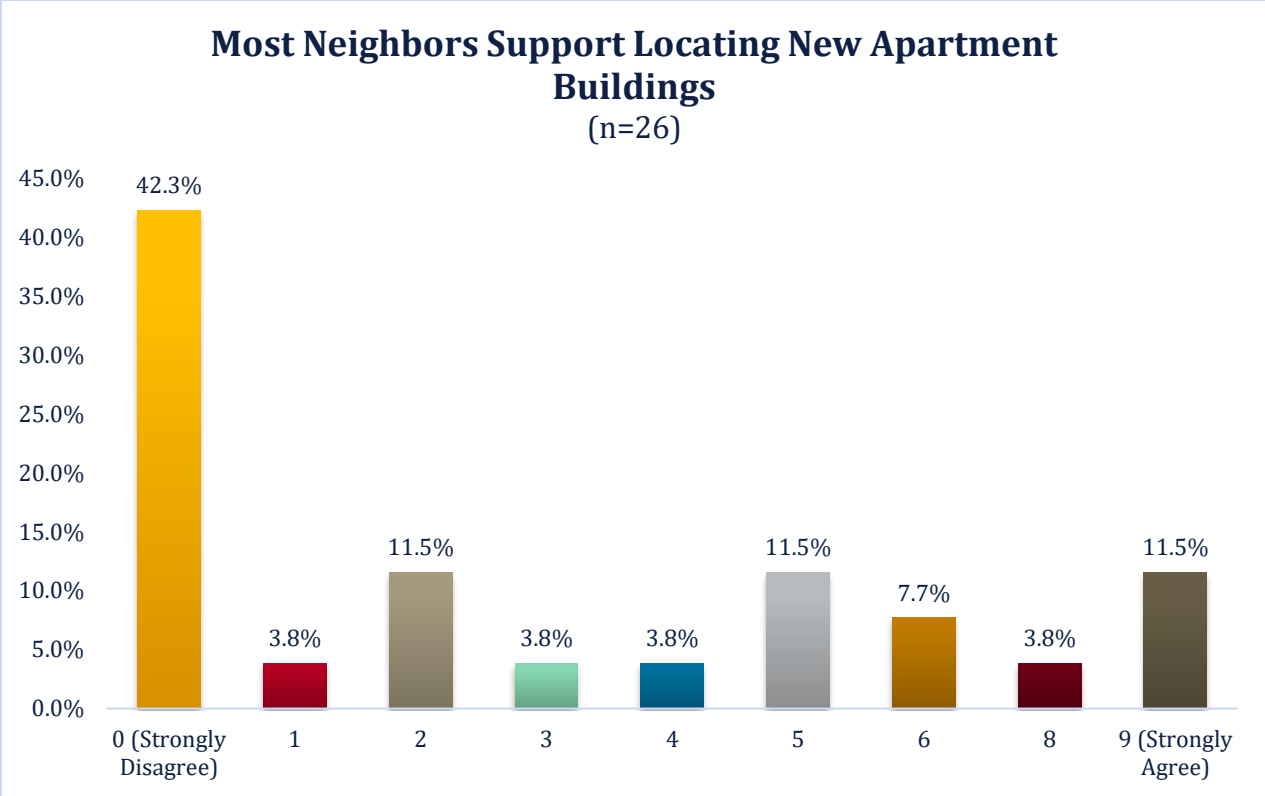


Figure 53 - Neighbors Support Locating New Apartment Buildings

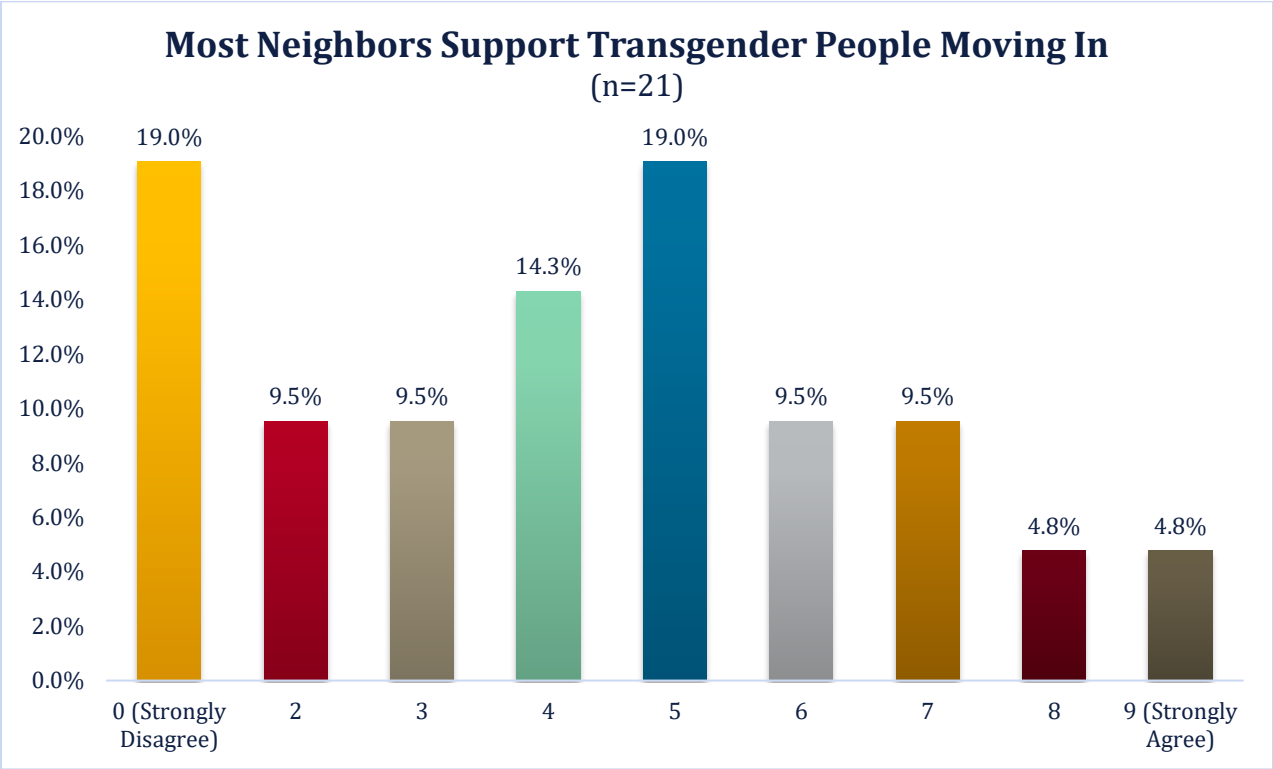
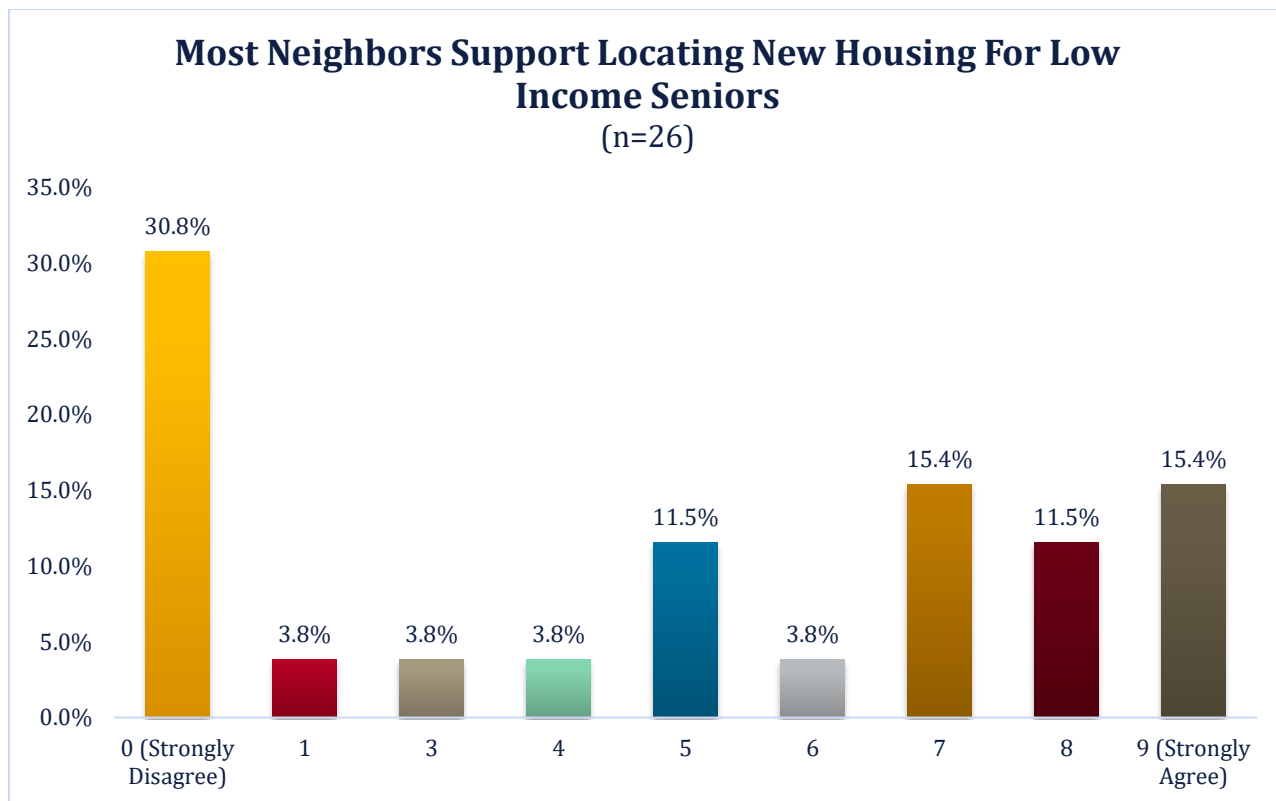
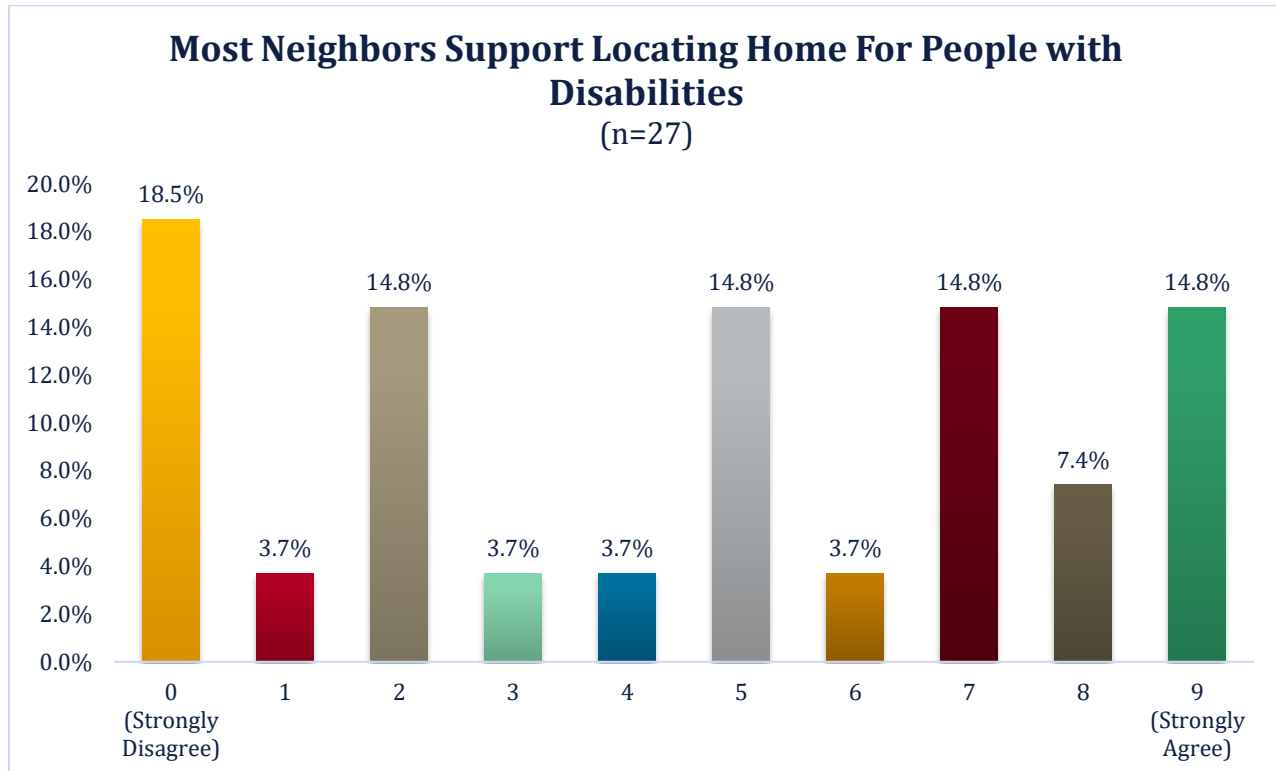


Figure 54 - Neighbors Support People of Transgender Moving In

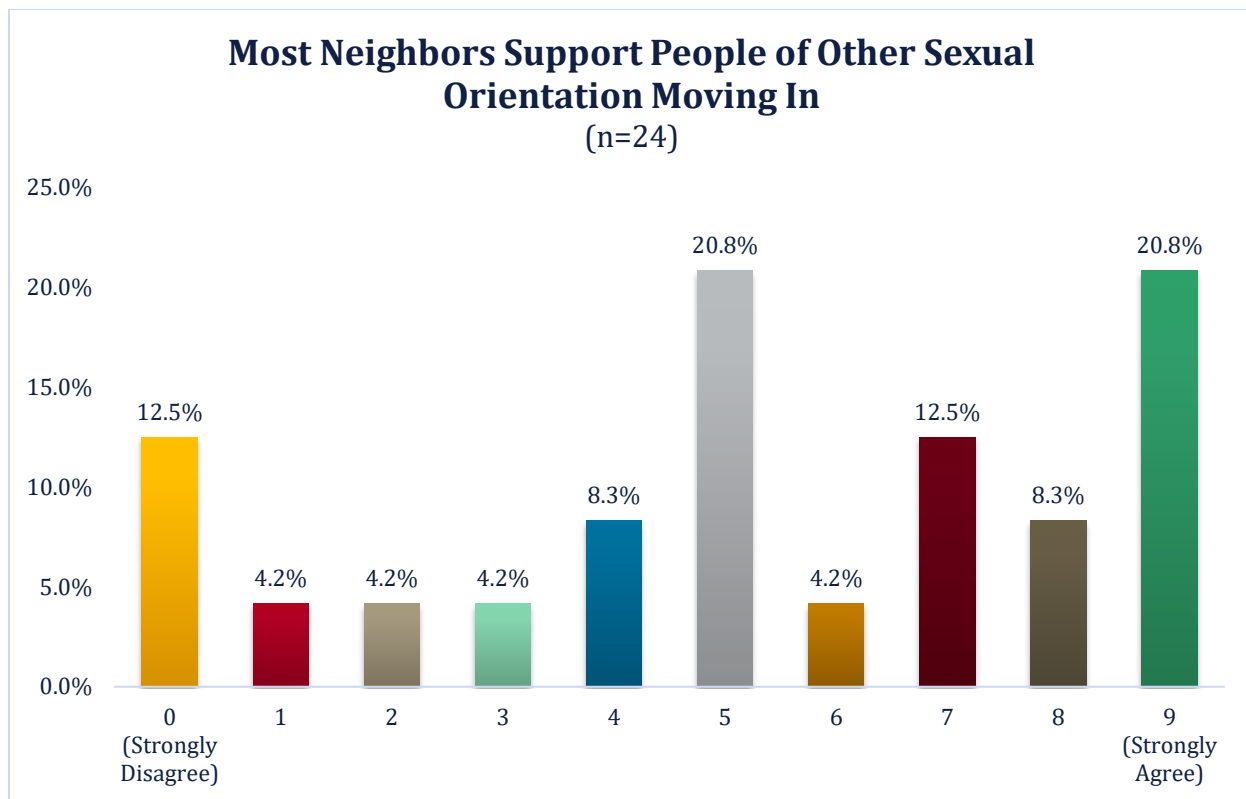


**Figure 55 - Neighbors Support Locating New Housing for Low Income Seniors**

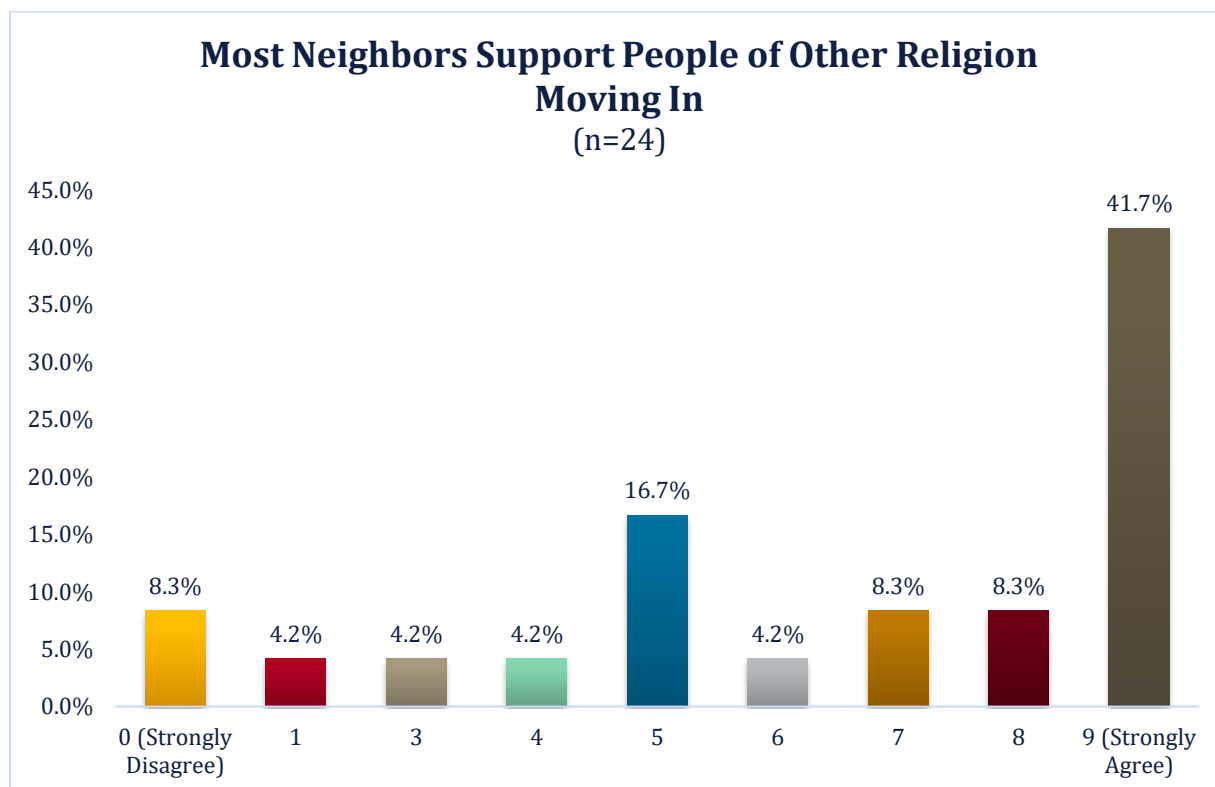


**Figure 56 - Neighbors Support Locating Home for People with Disabilities**

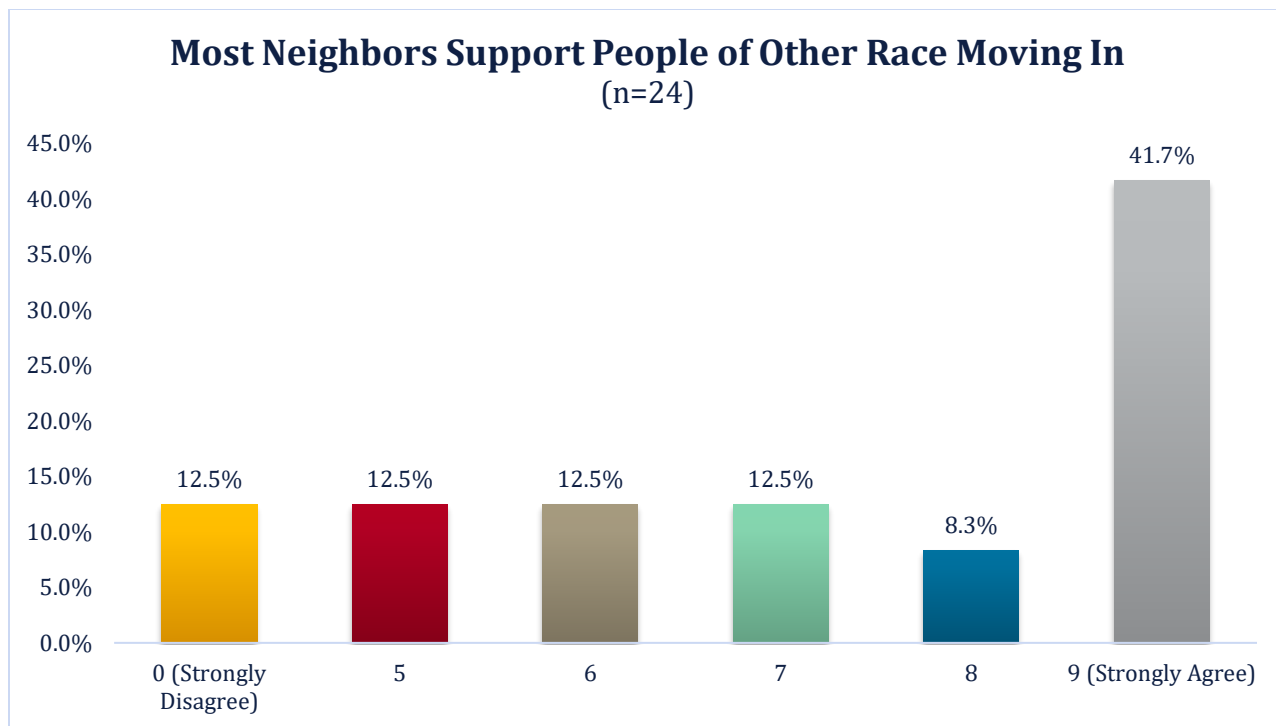




**Figure 57 - Neighbors Support People of Other Sexual Orientation**



**Figure 58 - Neighbors Support People of Other Religion Moving In**



**Figure 59 - Neighbors Support People of Other Race Moving In**

could help disabled people get a job. In order for them to receive better health services, some respondents said that doctors need to be more understanding and compassionate, some said the expansion of Medicaid, another mentioned higher pay, and one suggested more clinical appointments on sliding-scale fee. To better help disabled people access public amenities, one respondent suggested ADA Compliance at every location and festivals, and another said low cost adult classes. Respondents with disabilities noted that they face challenges in their housing situation. Most worried that housing equipped with accessibility features are out of their pricing

range. One respondent said, “I can't afford the housing that has accessibility features (e.g., grab bars, ramps, location, size of unit, quiet, chemical-free) I need.” Another mentioned fear of retaliatory eviction, I worry if I request an accommodation for my disability my rent will go up or I will be evicted “

### ***Experiences of Housing Discrimination***

When looking for housing in Goldsboro, there were seven respondents (23.3%) who reported being discriminated against. They indicated several reasons for this feeling: five respondents felt that discrimination was due to racism; three thought it was because of income level; and one thought it was as a

result of a past evictions and credit history. Four of the respondents said that the discrimination happened 2-5 years ago, while three respondents remembered it as occurring more than five years ago. Only one participant filed a complaint with HUD. Respondents were asked hypothetically what they would do if they or someone they knew was discriminated against when looking for a home. More than a quarter (28.6%) said they would do nothing. Four (14.3%) said they would contact a civil legal provider, 10.7% would reach out to a trusted family member, 10.7% would contact the housing authority, and 10.7% would look for assistance on the internet.

### ***Transportation Issues***

The majority of the respondents (96.6%) reported that they drive personal vehicle. Few respondents chose to walk (10.3%) or drive company vehicle (6.9%). Only a small number of respondents chose public transportation (3.4%). When further being asked how satisfied they are with their transportation situation, most respondents were satisfied. For those who were unhappy about the transportation situation, they mainly complained about the public transportation system in Goldsboro.

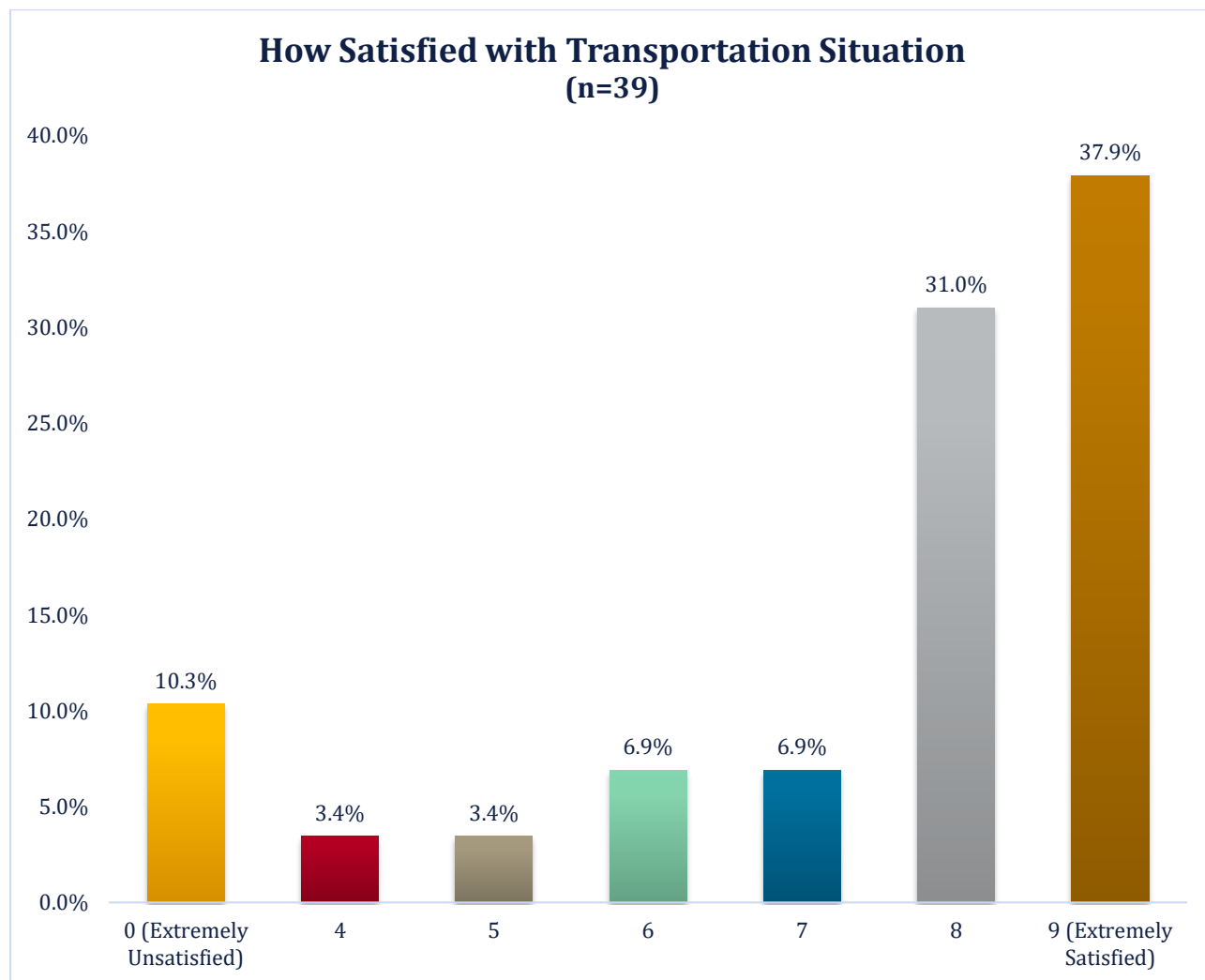
***Table 63 What would you do if someone you knew were discriminated against?***

<b>Action</b>	<b>Frequency</b>	<b>Valid Percent</b>
Nothing	8	28.6%
Contact a lawyer/Legal Aid/ACLU	4	14.3%
Contact a friend or family member I trust for advice	3	10.7%
Contact housing authority	3	10.7%
Look for help on the Internet	3	10.7%
Contact Community Relations Department	2	7.1%
Contact city/county government/elected officials	1	3.6%
Contact HUD	1	3.6%
Contact NAACP	1	3.6%
Other (please specify)	2	7.1%
Total	28	100.0%

***Table 64 - Mostly-Used Transportation Type***

<b>Transportation</b>	<b>%</b>	<b>% of Cases</b>
-----------------------	----------	-------------------

Drive personal vehicle	82.4%	96.6%
Walk	8.8%	10.3%
Drive company vehicle	5.9%	6.9%
Take public transit - bus, light rail	2.9%	3.4%



**Figure 60 - How Satisfied with Transportation Situation**

## Stakeholder Survey

### Respondents

The *Goldsboro Consolidated Plan and Analysis of Impediments Stakeholder Survey* was collected by the City of Goldsboro. There was a total of 26 respondents who completed the stakeholder survey. Of respondents, 24 (96%) provided services in the City of Goldsboro including: five stakeholders (20%) who work in Education, three stakeholders (12%) who work in Advocacy and/or legal services, (12%) in

Government, and (12%) in Human Services. Homeless Services had only two stakeholders (8%). Multifamily Development, Property Management, Land Use Planning, Services for Low Income Residents, and Transit Provider, all have only one stakeholder. It is worth mentioning that there are four stakeholders (16%) who chose “Other.” The answers they provided included multi-assistance nonprofit, public health, and managed care organization. One stakeholder did not indicate the type of organization they represented.

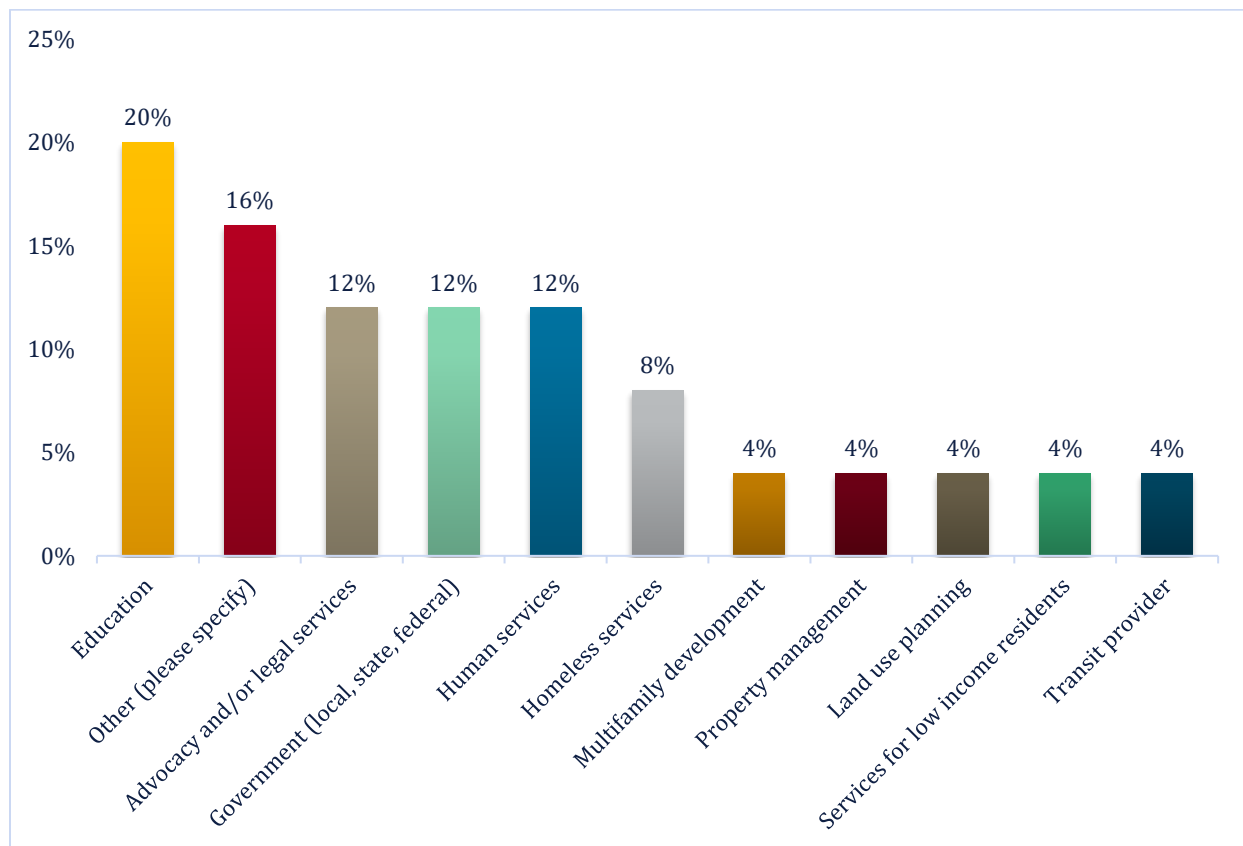
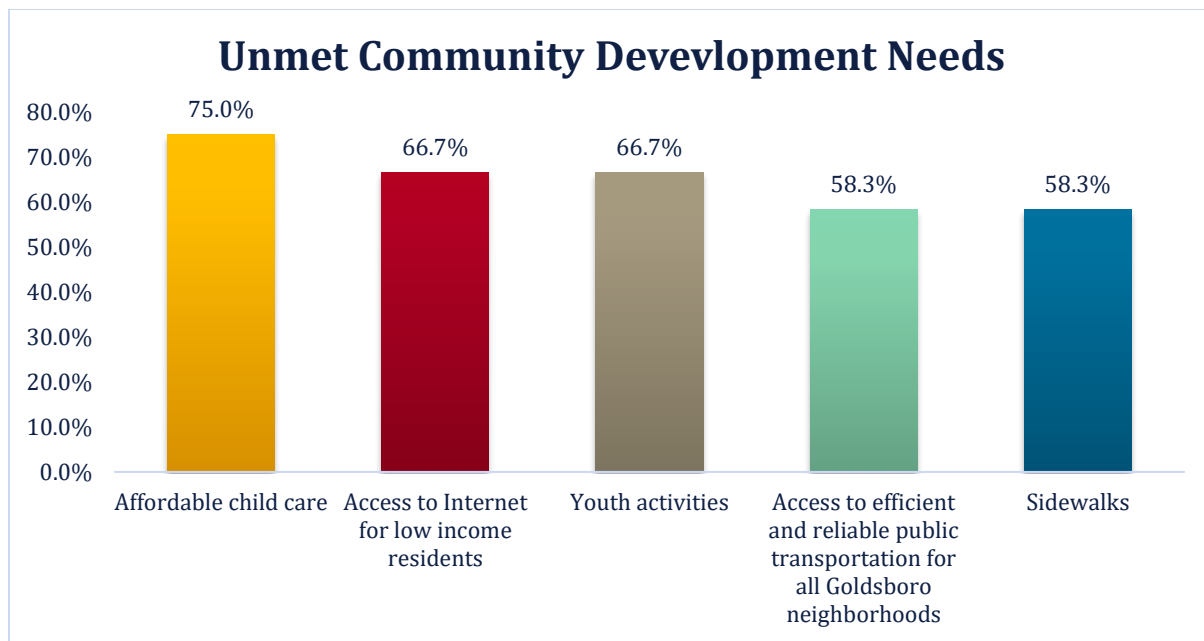


Figure 61 - Organizations Represented (n=25)



**Figure 62 - Top Five Unmet Community Development Needs in Goldsboro**

### **Unmet Community Development Needs**

Among the choices for unmet community development needs, the 12 respondents who answered this question selected *Affordable Child Care* (75.0%) as the greatest unmet need, followed by *Access to Internet for Low Income Residents* (66.7%), *Youth Activities* (66.7%), *Access to efficient and reliable public transportation for all Goldsboro neighborhoods* (58.3%), and *Sidewalks* (58.3%).

***There are a few schools that stand out as very underperforming. These schools have a high minority and low-income population. The schools need major repair and updates.***

***Focus on the youth. They are the community in years to come. Instead of trying to fix what is going wrong in the community, we should bring up the youth so that they are the fix. Youth are the building blocks or foundation of the community. We need a strong foundation to build a strong community.***

When asked which areas in the City are these unmet community development needs most prevalent, eight stakeholders provided their thoughts. Two of them mentioned the northern area of the City needs urgent community development; three pointed out that the inner area of the City was crucial, such as the Webtown neighborhood, Ashe Street to Slocumb Street. One stakeholder mentioned that several places need

sidewalks for people to get around more safely. Another stakeholder said that there are a number of schools that need extra attention in terms of repairs and updates.

***How to increase the effectiveness of the community development programs?***

Stakeholders were asked how to increase the effectiveness of the community development programs in the City of Goldsboro. Overall, the suggested adopting a more proactive approach to addressing community needs. Stakeholders emphasized leveraging as many grants and sponsorships as possible, making more direct outreach efforts, said sharing more information to the people who need it most. One stakeholder offered suggested a 'decision-making council' with people who are facing the issues in their communities such that diverse voices can be heard and the decision makers can have better understanding about what their constituents' true thinking and real needs are. Another stakeholder suggested offering free internet service for income-qualifying residents so that higher usage of resources can be expected, and educational opportunities can be increased. Several respondents said there should be greater

***Limited opportunities for clean, safe affordable housing, Utilities are too high. Not enough supply for homelessness that match the need.***

focus on preparing youth to make positive contributions to the community. A respondent pointed out that community development programs should get into the schools and get students and parents involved in the process.

***What are the top five greatest unmet housing needs?***

When asked about significant changes that have occurred in the Goldsboro housing market in past years, there were 11 stakeholders who gave input. The most outstanding issue was the shortage of affordable housing. As pointed out from several stakeholders, Goldsboro has limited opportunities for clean, safe, and affordable housing. They also noted that utilities are too high. Housing units for vulnerable populations and the homeless are far from enough. Some stakeholders said that as a result of rising property tax and property values in recent years the housing market in Goldsboro is out of the price range even for the middle class. Another stakeholder noticed the impact from natural and



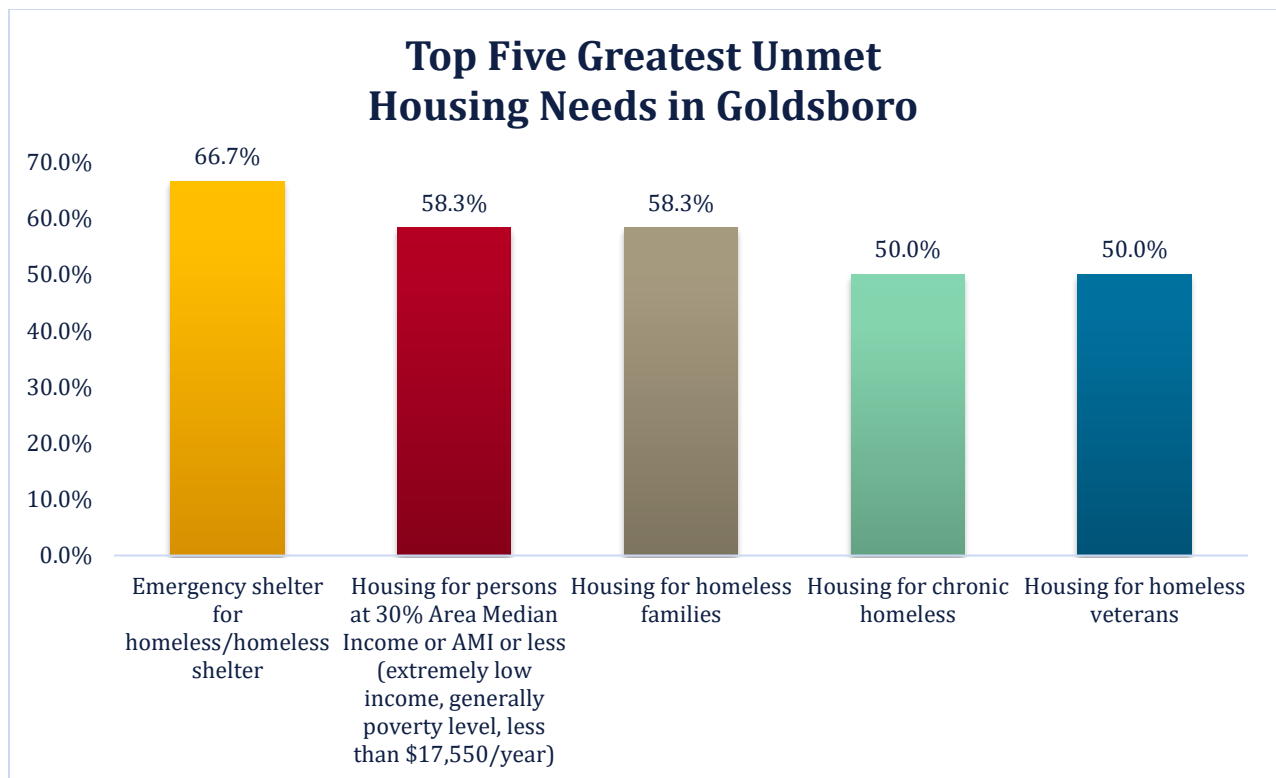
economic damages, saying that hurricane-related damage uprooted many residents, and they now can't find rental property that is both affordable and good quality for them to settle down.

Another issue brought by stakeholder is the landlords' attitude in participating the Section 8 Housing Choice Voucher program. On one hand, the landlords are unwilling to participate the program, on the other hand, housing code inspections are only implemented to a minimum level.

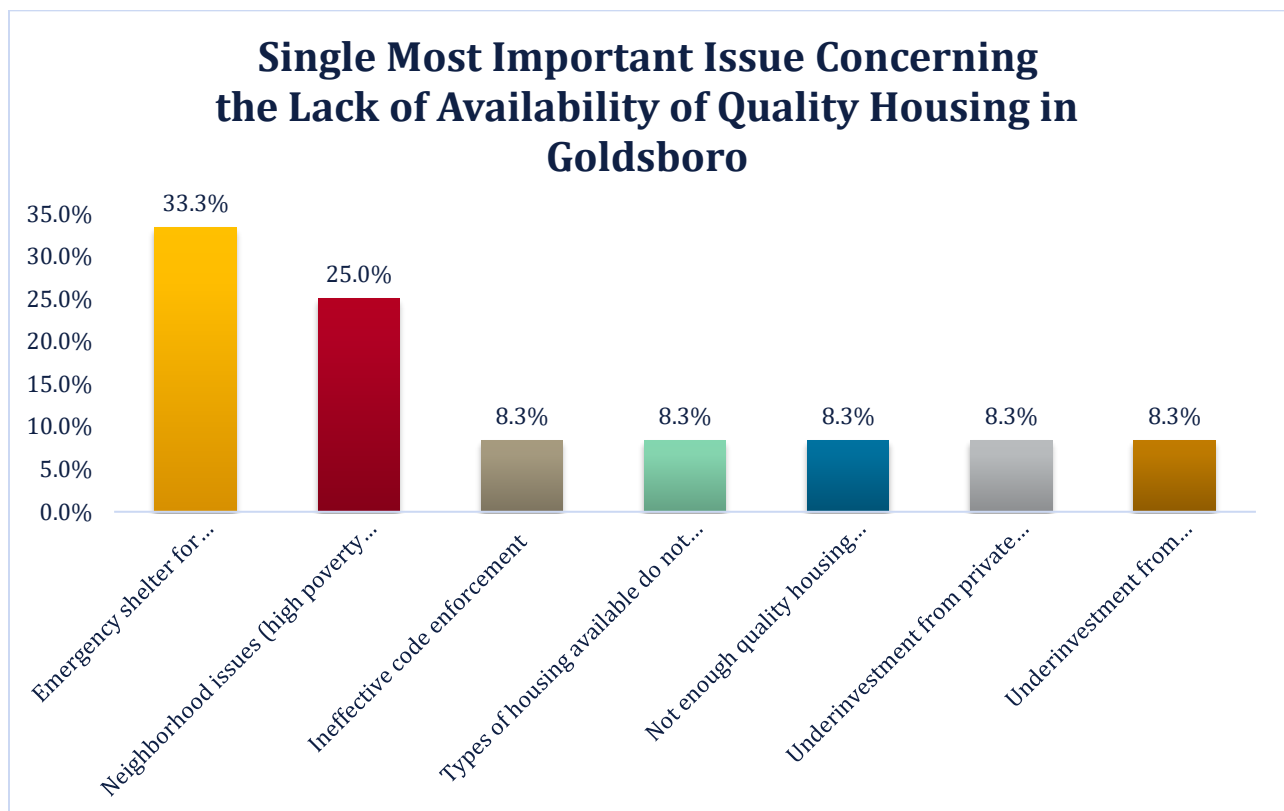
Under such influences in recent years, nearly all stakeholders recognized that the low-income families are the most affected resident group. One stakeholder expanded the most affected groups to single parent families, citizens with criminal backgrounds, persons with mental health challenges as well. A few stakeholders also mentioned the moderate-income families. However, one stakeholder warned that Goldsboro has already subsidized enough housing relative to its capacity that crime and economy issues become more and more obvious to see.

***Low income residents, single parent families, citizens with criminal backgrounds, persons with mental health challenges.***

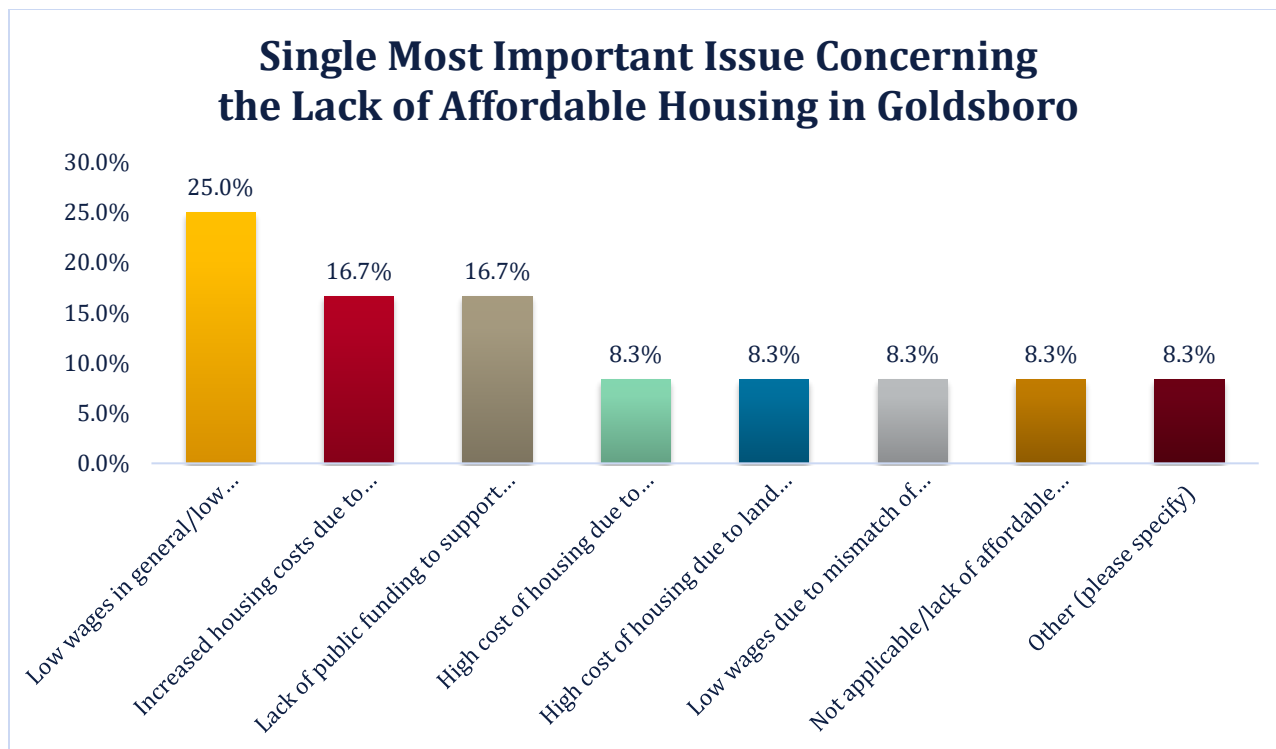
After reviewing the changes and its most affected groups in recent years, stakeholders have picked the Emergency shelter for homeless as the greatest unmet housing needs. Housing for persons at 30% Area Median Income (AMI) came next, then the housing for homeless families, housing for chronic homeless, and housing for homeless veterans. These top five unmet housing needs embodied stakeholders' consensus on extremely low-income families being the top concern. When being asked the single most important issue concerning the lack of availability of quality housing in Goldsboro, stakeholders still reached to a common result that Emergency shelter for homeless is the most important. As to what is the most important issue concerning the lack of affordable housing in Goldsboro, a quarter of stakeholders answered low wages in general or low minimum wage as the top reason.



**Figure 63 - Top Five Greatest Unmet Housing Needs in Goldsboro**



**Figure 64 - Single Most Important Issue about the Lack of Quality Housing in Goldsboro**



**Figure 65 - Single Most Important Issue about the Lack of Affordable Housing in Goldsboro**

### ***Effectiveness of The Housing Programs***

Stakeholders offered plenty of suggestions in regard to how to increase the effectiveness of the housing program. Their suggestions can be summarized into three kinds of efforts.

Firstly, the residents need to get more involved in their own communities; they need to continue to engage the community and the business community to find best solution. Once their involvement gets to another level, the revitalization of neighborhoods can be expected and the whole community can be cleaned up and stays clean.

Secondly, invest more efforts in amendment of current neighborhood situations. For example, one stakeholder said that building more affordable housing for low income and homeless people needs to be done in a urgent manner. Another stakeholder said that street improvements need to be addressed in top priorities such as sidewalks, surrounding home repairs. Also, increase the turnaround from foreclosing properties at risk to creating more affordable housing opportunities. For landlords who are unwilling to comply with the code requirement, just enforce the code more aggressively.

Thirdly, get more assistance from useful resources. Some stakeholders pointed out that providing sustainable grant opportunities in six figures to trusted organizations over next five years. Other stakeholder said financial assistance needs to provide to property owners as well so that they can make necessary repairs and keep properties up to code requirement.

Finally, despite the fact that nearly all stakeholders endorse more investment in affordable housing, one stakeholder cautioned that such investment needs to be stopped because the corresponding issues along with public housing have increased dramatically.

With the above suggestions in mind, stakeholders offered their thoughts on how they would it. Some focused on the resident's aspect, such as being more involved to keep their community clean, join workshops on health and education. If any criminal behaviors were found in the community, however, we should have zero tolerance towards it. A few others focused on having more practical attitude for

***Provide sustainable grant opportunities over the next five years in the 6 figures to trusted organizations.***

properties such as making properties safe and inhabitable rather than emphasizing its cosmetics. One stakeholder mentioned the idea of fully taking advantage of grant opportunities, utilizing non-profit volunteer efforts, and offering onsite youth opportunities. Finally, there is one stakeholder who thought about this question from a larger picture, saying that a master plan for the entire community is necessary to communicate, share strategies, and coordinate efforts.

Such strategies can bring a variety of positive outcomes as noted by stakeholders. First of all, more people can find affordable housing

***Create a master plan for the entire community - not just a portion - and hold monthly stakeholder meetings with agencies focused on affordable housing - rental & ownership - to communicate, share strategies & opportunities and coordinate efforts when possible. There is not enough communication about how to address housing and community development in Goldsboro.***

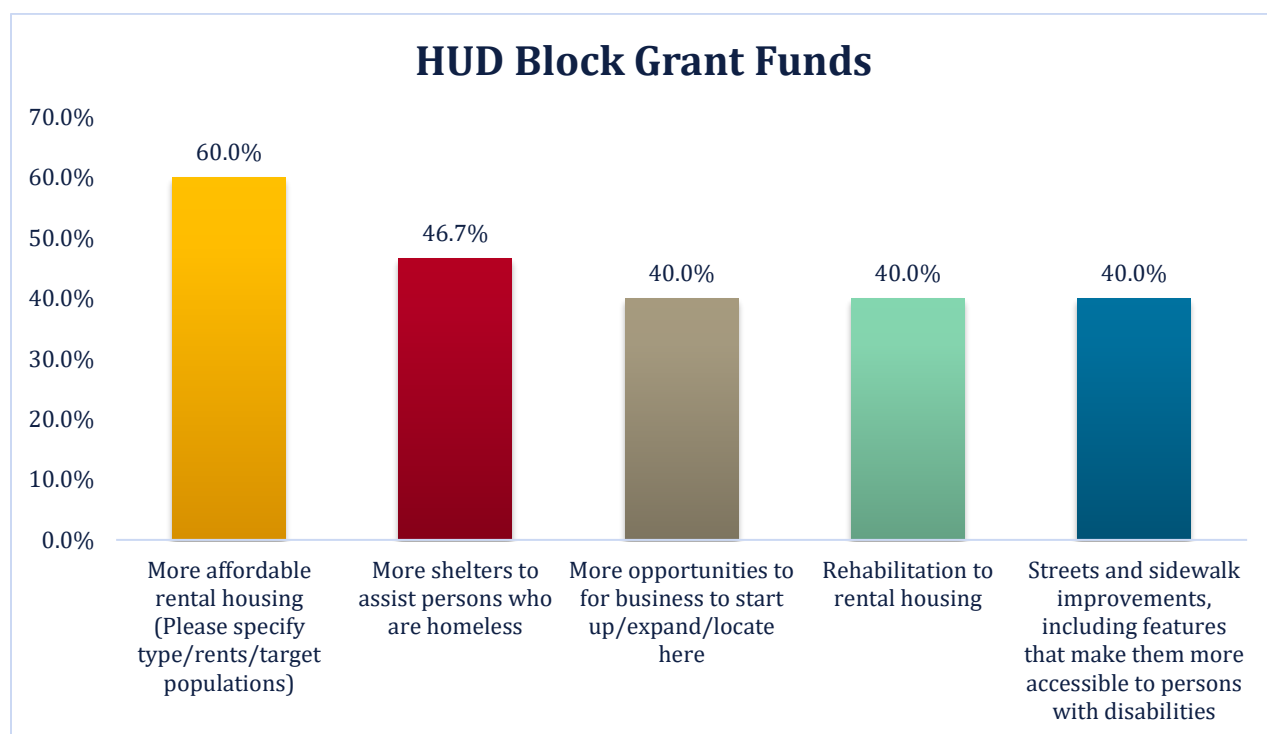
to suit their needs. Secondly, more people can gain skills and thus restore their hope for the family. The health disparities can also be addressed to a certain degree correspondingly. Lastly, the property values can also be increased.

For those stakeholders who also provide homeless housing or services, they mentioned that they need organizational and project funding for staff, facilities to house the homeless with education and training. There is one stakeholder who called for multiple resources as needed, such as

belief, structure, opportunities, and mental health case management.

### ***HUD Assistance***

Stakeholders have envisioned that if getting designated grant funds from HUD to address the housing and community development needs, building more affordable rental housing would be the greatest outcome. Having more shelters for homeless persons would be the second greatest outcome. Then, there was equal support for opportunities for business, rehabilitation to rental housing, and streets and sidewalk improvements.



**Figure 66 - Top Five Suggestions for HUD Block Grant Funds**

When adding more details to the above envisioned top outcomes, stakeholders have not only spoken more about the benefits from more affordable and accessible housing, but also mentioned a couple of aspects that went beyond the survey options. For example, one stakeholder suggested that when working with families at or below 80% of median household income, we should keep in mind that 40% of gross income is the threshold for debt-to-income before they become too heavy. Another stakeholder suggested that more funds should be allocated into childcare centers and education. There is one stakeholder, who have witnessed the history of Goldsboro for at least 30 years, saying that Goldsboro has a serious problem of

***More needs to be done to encourage businesses for jobs and stop subsidizing everything. Goldsboro is a decaying shell of what it once was. As a child I was amazed at all of the amenities the community once had that had disappeared. There was little to keep young adults in town and crime was on the rise then. Now those were the glory days and Goldsboro is even worse off than 30 years ago when it seemed bad. The children of each generation with any ambition and sense run for the hills as soon as they turn 18.***

***Create a center - not United Way - for governmental services, nonprofits, and faith-based organizations at which all can come together to identify community needs, reduce duplication of services, compare calendars, and train for maximum efficiency in service provision, finding funding/creating income, connecting with populations served, and communicating services. The center could provide certain services to the agencies and organizations, such as training or legal advice. It could include an incubator for new nonprofits.***

losing jobs and young generations. So, instead of subsidizing everything in Goldsboro, more needs to be done to encourage businesses for jobs.

Stakeholders are full of ideas about what to do when having additional funds to address capacity and organization needs. Some would hire more staff to undertake rehabilitation of structures, build small communities to address issues caused the homelessness, build women shelters and rehab homes, and so on. Others suggest increasing bus services frequency from 1 hour to half an hour, investing more in infrastructure projects, extending low-income schools who completed focused on End-of-Grade (EOG) tests to more grades

and more specialized subjects. There is one stakeholder who calls for a new type of center that all can come together to identify community needs, reduce duplication of services, compare calendars, train for maximum efficiency in service provision, etc. Such center would also provide certain services to agencies and organizations.

***What can be learned from other places and practices?***

When asked best practices about capacity-building for nonprofits that Goldsboro can borrow, some stakeholders mentioned a few places such as Forsythe County, Fayetteville, and Rocky Mount. Some stakeholder suggested that capacity building can also include privately funded nonprofits rather than everything to be done at the expense of the taxpayer. Other stakeholders pointed out that capacity-building for nonprofits should shift its focus on schools because the better education on younger generation can make them take on more responsibilities for the community.

Stakeholders held different thoughts on how to improve the Annual Action Plan. One stakeholder suggested that the Plan needs to be expanded to the south of Ash Street and its surrounding neighborhoods as well.

***I don't see low income housing as a solution to any kind of problem. The low-income housing, I see around Goldsboro are run down nasty dumps. I think more needs to be asked of Goldsboro residents. That isn't a popular opinion after so many years of handouts. That is why we need to focus on our youth. Effectively educating them and training them to understand hard work and working for what you want.***

Another stakeholder warned that any plan needs to let residents fully understand them so that they can care in the same way as plan makers. However, there is one stakeholder who always put education on first thought saying that low-income housing is simply not the solution to any kind of problem. Focusing on more youth, effectively educating them, and training them to understand hard work and working for what they want are the real solution.

Stakeholders also talked about other programs or policies that Goldsboro can tap into to addressing its housing and community development needs. One stakeholder said City of Rocky Mount has included low-income community representation in their planning process so that all sectors of the community have a stake at the table. Other stakeholders call for more community involvement from example



of Rocky Mount and Fayetteville. They mentioned that more coordination with other stakeholders in the community is quite necessary. Another stakeholder said that when it comes to housing and community development, more public information needs to be advertised rather than merely on Facebook.

### **Key Informant Interviews**

Interviews were conducted with a diverse set of people with housing related interests. Included in the pool were planners, economic development professionals, housing advocates, and advocates for persons who belong to protected classes including: Wayne County Planning Board, Wayne County Planning Department, Wayne County Public Schools, Community Soup Kitchen, Downtown Goldsboro, The 4 Day Movement, Inc, Rebuilding Broken Places, Wayne Uplift Resource Association, WayneForward, Wayne Action Group for Economic Solvency, Down East Coalition to Eliminate Homelessness, Literacy Connections, Wayne County Services on Aging, Habitat for Humanity - Goldsboro-Wayne County, Legal Aid of North Carolina, NC Justice Center, and Wayne Community College. Informants were selected based on

their participation in housing-related planning and practices in Goldsboro, their knowledge regarding fair housing issues, and/or their ability to speak to the experiences of members of protected classes. Since this report is focused primarily on impediments to fair housing choice, the key informants were asked to discuss in concrete terms the functional and policy issues that, in their opinion, pose the greatest impediment to fair housing choice in their service area.

Key Informants were assured that the information they shared would be kept completely confidential, so they could feel free to speak openly and honestly about their observations and concerns. In order to honor this commitment, this report does not list the names of key informants, only organizations, and does not attribute quotes to specific participants. All of the key informants taking part in this study had specific knowledge about housing conditions and barriers to housing choice within Goldsboro.

The research team sent emails to each potential key informant requesting his or her cooperation for an interview. A majority of those contacted agreed to be interviewed.

CHCS staff interviewed 20 key informants. For ease of access, all interviews were conducted over zoom. Interviews averaged about an hour and in some cases, interviewees were contacted more than once for additional follow up. Interviews were semi-structured, with most interviewees responding to similar questions. At times, researchers elected to change questions in order to best reflect the experiences and knowledge of the interviewee. During the interview, researchers took summary notes of responses in order to guide further questioning. Following the interviews, researchers reviewed the video recording of the interview and conducted spot-transcription of key themes.

### ***People in Need***

Participants were asked about groups or classes of people are in most need of affordable and decent housing. Responses were categorized into the following groups: cost burdened renters, moderate income workforce, single mothers, seniors, African Americans, homeless individuals, and those with mental or behavioral health issues.

### **Cost Burdened Renters**

According to interviewees, the rental community is most in need. Specifically, the low- to moderate-income rental community is cost burdened, paying too high a proportion of income for housing and housing-related expenses. The lack of affordable homeownership options puts pressure on the rental market. This issue is worse in lower-income and minority communities. Most vulnerable are those just above the HUD assistance income level and at the lower end of the affordable housing market. The combination in cost of housing + utilities + transportation results in a choice for many each month between which bills are paid and which become delinquent. One participant noted, “while affordable housing is needed, some have the means to pay rent, but don’t have the funds to pay rent and utilities.” Additionally, affordable units may be of substandard quality, “There are many dilapidated units that could be renovated and placed back on the market. But greed (hoping to sell or rent for higher amounts) and lack of caring about needs of others keep units off the market and unused.”

### Moderate Income Workforce

Rent burden also affects those in the 80%-120% AMI category. An interviewee noted, “community perception is that affordable housing is only for low income people – but there are working people groups such as teachers, fire fighters, and police who also need “affordable” housing.” Another participant added, “hourly wage and public employees, their incomes put them in the low end of market rate housing. They have limited options of where to live if price and location are both important.” Incomes in Goldsboro are not keeping up with housing prices, contributing to the disparities. Working people often are forced to decide between the affordability in less desirable housing versus or the risk of eviction and cost-burden in a more desirable home. “What is missing is ‘middle’ affordable housing – above low income and at the lower end of market rate housing. There are not many options for the median income range home buyer. There are not many programs established to help this group and there is need for Federal & City money to make a difference.

### Single Mothers

Single mothers stood out in many of the interviews as a class facing issues. They face stigma associated with why they are not living with the children’s father. Landlords may view them as an unreliable source of paying rent. Because of this stigma they are not given the opportunity to become a resident in in some places because they are thought to be too much of an economic risk. “They are denied the opportunity to prove they are not the risk they are believed to be.” In some cases, the threshold for being an acceptable risk may be higher than that applied to a “conventional” family. One participant felt this might also hold for single fathers. Familial status discrimination may result from this stigma.

### Seniors

According to interviewees, there is great demand for senior housing. Many older people want to live in Goldsboro. Military retirees, people who moved away and are coming back in their later years, those looking for a lower cost of living compared to many other places in the state, retirees from industry, etc. “[It is] important to recognize the value of investing in attracting and keeping retirees.... Placements must be safe,

affordable, and accessible to transportation. Kirkwood is a moderate cost senior community near the mall. Besides the location the unit have many amenities that are appropriate for seniors and individuals with disabilities.” Interviewees noted that seniors help the City by adding to the tax base and that keeping retirees out of nursing homes will save cost the State and Federal Governments.

#### **African Americans**

Low-to-moderate income African Americans are facing disproportionate housing cost burden compared to other racial groups, explains one interviewee. This fact is strongly supported in all of the data collected. Yet, one interviewee underscores that the need is not racial but economic, “it is less a black/brown issue and more of the same groups of people needing housing in the same price range and with similar needs of access to schools, shopping, and health care. It is not that there are not housing disparities – but higher densities of groups with housing issues increases the perception that all the access issues are related to actual disparities.”

#### ***Hispanic & Limited English Proficient***

While respondents say that the housing issues for the foreign-born community are mostly in the County, they do recognize that some, primarily Hispanic Limited English Proficient residents, have challenges understanding documents written in English and may be taken advantage of. “They have difficulty getting information needed regarding housing options.” Another respondent underscores that the lack of availability of interpreters limits the access to some housing opportunities for Limited English Proficient home seekers. “There is a language barrier affecting Hispanics that results in their being directed away from some housing and towards other housing. But the issue is not systemic, [I am] not sure of the implementors of this practice, just aware that it occurs.”

#### ***Neighborhoods of Need***

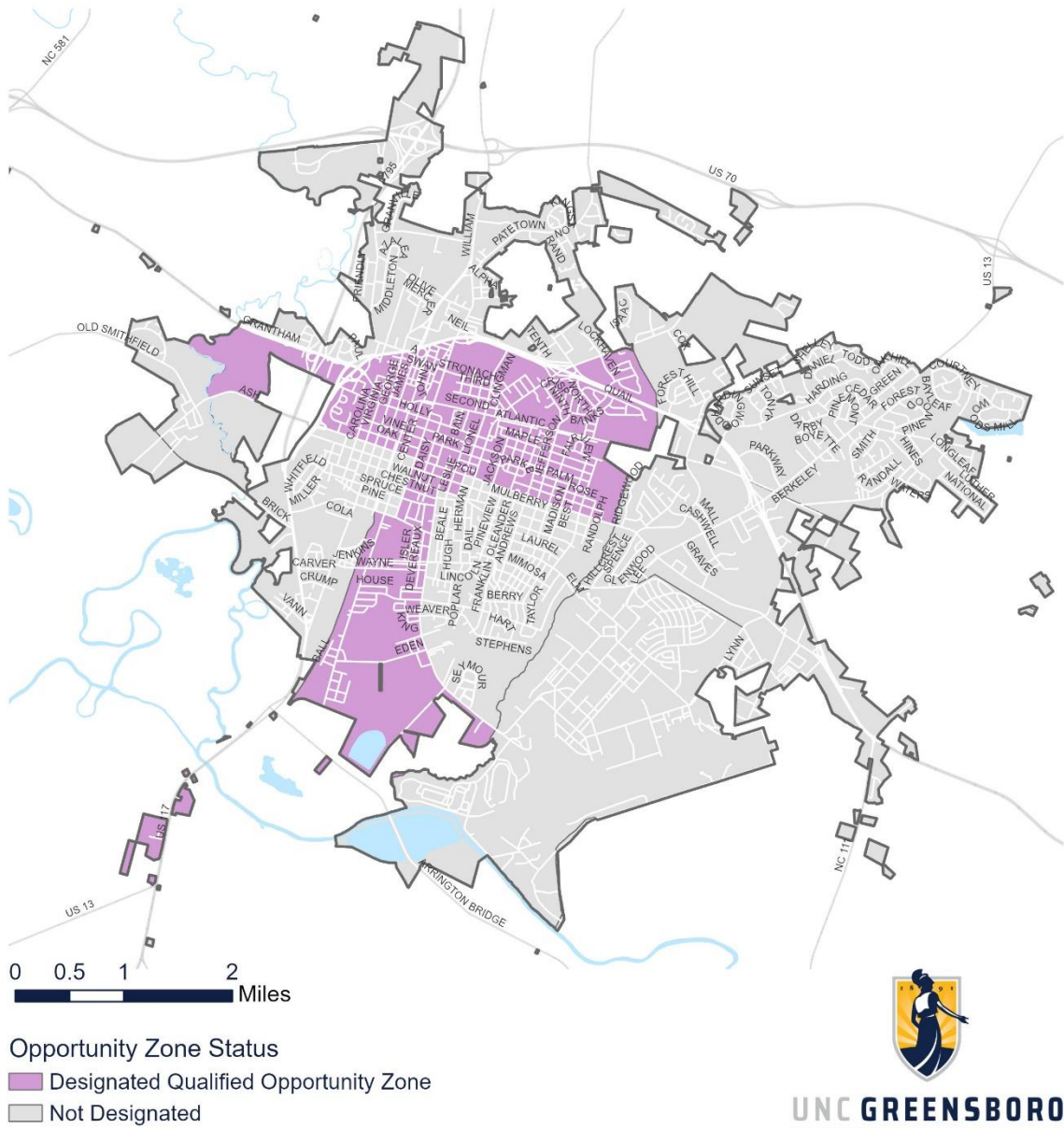
Participants were asked about areas of Goldsboro that have the most need for improvements in the availability and quality of housing. One interviewee noted, “there is affordable housing available to low to moderate income residents but there are other factors (such as location) that make some housing that may be in the affordable

range not desirable.” Overall, the City has a limited supply of affordable housing units including ones that moderate-income families such as law enforcement, firefighters, and teachers can afford. In downtown Goldsboro there are a number of boarded up single family housing units. Also, there are areas where housing has aged and deteriorated and is in need of improvement. Around downtown there are some vacant tracts where homes used to be that could be developed. In some parts of the city some of the housing on large tracts have low home values. Housing in the historic southern part of the center city with large lot sizes which were once part of very good housing neighborhoods have deteriorated. One area on Spence Avenue was pointed out as being referred to as “Pill Hill” and is an example of decline. A respondent noted that in these areas the return on investment for rehabilitation may not be sound. “[It is] costly to refurbish older historic housing. Many units may be past the point of being renovated cost-wise.” The deterioration of these neighborhoods along with dissatisfaction with local schools contributed

to the decline and disinvestment by the city and private investors. Other areas of need included, “North Goldsboro, N. John St., N. Center St., Welltown area, inner city have declined, while the suburbs are better off.” Some of these areas are distressed and have already been identified as Opportunity Zones. The areas have deteriorated and dilapidated homes in need of repairs. Additionally, there are limited options for safe and decent affordable housing, especially for low-income residents who are at 30% and below the Area Median Income (AMI). Housing quality has declined in “Williams St Extension, Paytown Rd, New Hope Rd, at the end there is a new development that is positive, Elm running between Berkeley and Slocum – older homes that have become more affordable.” Likewise, “the North End, Weebtown, and the Little Washington neighborhoods are areas that need improvements in the quality of housing.” Interviewees note that there is some limited affordable housing in the City near Wayne Memorial and Central Heights Rd. but that there also is a 6 -7 month waiting list.

# Goldsboro, NC

Opportunity Zones by Census Tract  
Data Source: CDFI Fund, 2018



UNC GREENSBORO

Center for Housing  
& Community Studies

Date Created: 3/19/2021

Figure 67 - Opportunity Zones Goldsboro

### ***Fair Housing Issues***

In addition to previously discussed issues of familial discrimination, fair housing issues identified by interviewees included racial discrimination, religious discrimination, and national origin discrimination. “People of color tend to get treated differently by people of a different skin tone or social/economic class. It is not addressed openly, but there are real estate agents who will direct potential tenants away from some properties because of race.” Another respondent counters though, “[There is] no real steering away from neighborhoods based on housing. Most steering is in the connection with schools and school districts. Inner city schools are perceived as “weaker” than schools in the outer part of the city and the County. Inner city schools are less racially diverse.” Yet another says steering is more a factor of economic conditions, “What does occur is that potential residents are steered based on price points. Lower income people are ‘steered’ towards housing they can afford, and this housing includes units that may be substandard.” The subject of steering also included national origin. “Undocumented immigrants are ‘steered’ towards low quality housing

because even if substandard they have no legal recourse to challenge the housing conditions without risking arrest and deportation.” Yet another protected class, that of religion, seemed to face discriminatory practices, “Goldsboro is a conservative community. There is discrimination against people who practice non-Christian religions” Steering to or away from neighborhoods, and denial of housing for a protected class of person, are all violations of fair housing law and may warrant further investigation by paired-testing studies.

### ***Barriers to Opportunity***

Respondents were asked about the key barriers to affordable housing opportunity. Most said it was issues of a lack of planning by the City, a problem with the poor-quality schools in Goldsboro, and NIMBYism.

#### ***Lack of planning & Leadership***

“The City does not have a plan for addressing the demand for affordable housing,” said one interviewee. Another agreed that, “[the] City does not know what it is doing.” Blame was levied at the City as community organization looked for leadership, “[There is] no organized effort to promote affordable housing. Every organization has its own plan.



The City needs to take the lead and needs to have a dedicated leader to conduct and lead planning.” Another person elaborated, “there is no organized effort to promote affordable housing. Not enough entities are involved to push creative solutions. The City operates with one lynchpin, one conduit, the community development director. This is a major barrier.” This person believed that the City is not interested in taking the actions it needs to make major improvements. “No one person should be in control to access HUD funding. The position is understaffed – possibly intentionally so.” Another community participant felt the lack of planning and leadership when it comes to HOME and CDBG funds was perhaps intentional. “[I am] not sure if the funding allocated for low-income housing is being spent as it has been allocated. Not suggesting anything illegal, just decisions to spend the funding may not be in the best interests for whom or what the funding has been designated.”

### Schools

Another barrier that was mentioned very frequently was the discussion of city schools.” Some of the city schools are not as good as charter schools.... Low to moderate

income residents don’t support charter schools.” Universally, respondents talked about the city schools being inferior to those outside the city and in the county. This dichotomy was said to be driving the flight to the county for home sales leaving the city for lower-income rentals.

### NIMBYism

There has been neighborhood resistance to increased development and affordable housing in Goldsboro. Many neighborhoods have fought rezoning requests to add density based upon perceived or real increases in traffic congestion. This neighborhood resistance seems to reflect the typical of NIMBYism where people do not want certain developments or changes in their neighborhoods based upon real or perceived concerns or based upon biases about who or what will be located in their neighborhoods. An interviewee notes, “there is some “push back” against affordable housing because the term gets associated with “the projects” and “problem housing” that attracts undesirable occupants. Affordable housing needs to be recognized as housing that employed people including police officers and schoolteachers can afford.” Yet, while there have been some

efforts by private developers to bring workforce housing to Goldsboro, when such projects are proposed there is often a strong reaction by community before it really gets off the ground.

### ***Promoting Access to Affordable and Decent Housing***

Interview participants were asked about positive steps being taken to promote access to affordable and decent housing in Goldsboro. They explained that there had been some improvements of older housing in the city including a “crack down” on some of the housing that had been boarded up requiring action to improve the properties so they could be inhabited. Good collaborative effort with community partners were noted. A coalition had emerged with WayneForward, Legal Aid, Habitat for Humanity, NC Justice, and others that works on issues including affordable housing, health access, and employment. It received City funding geared towards advocating for affordable housing. WayneForward in particular is a community advisory committee that focus on affordable housing and homelessness and has been in communication with the City regarding condemned housing and getting landlords to

fix their properties. Legal Aid too has assisted individual tenants with issues such as poor housing conditions. They advocate on the tenants’ behalf to help them live in safe and decent rental housing. They promote equitable housing and community development through efforts including community educational sessions, research of housing and community development strategies, written comments to the City with recommendations regarding City plans, and meetings and communications with the City. The Goldsboro Housing Authority was also noted for buying up and renovating properties, “in the past few years [they] have done this for four or five apartment complexes. But, except for the Fordham project, the Housing Authority is not very effective at addressing housing needs of some of the most vulnerable including the homeless.” Another barrier for low income residents is the lack of sufficient credit to purchase a home. “There are some programs to help with building good credit status, but many applicants find it difficult to take all the necessary actions to save and to achieve a debt-to-income ratio that places them at a level of risk of lenders are willing to accept. Consequently, some home

lending funds are not accessed because of too few applicants.”

### **Recommended Actions**

Participant were asked to discuss a policy change or other action that would most benefit those in most need of assistance in getting access to decent affordable housing. The range of choices included preventing displacement, preserving current supply of affordable housing, increasing the supply of affordable housing, revising land use and zoning to encourage affordability in high opportunity areas, increasing well-paying opportunities, improving neighborhood schools, increasing fair housing awareness, commissioning a comprehensive affordable housing plan, and creating an affordable housing task force or commission.

#### ***Increase Supply of Affordable Housing***

Housing markets respond to supply and demand. The demand for affordable housing outstrips supply, but the issue with increasing affordable housing is one of a lack of return on investment for the builder. Increasing the supply comes down to an issue of incentivizing builder making it cheaper to build affordable units including by providing low-cost capital , “the City needs more capital to be invested in

affordable housing.” One respondent noted that for years, the City has carried over a substantial amount of HOME funds unspent. “The City stated that it carried over a substantial amount of HOME funds from prior years because it did not undertake large development projects or because there have not been numerous potential home buyers who qualify for a mortgage loan from a lender.” Another interviewee suggested that the policy landscape within the City made it unfriendly to builders, they “need to look at restrictions and regulations affecting new construction.”

#### ***Preserve Current Supply of Affordable Housing***

One element in the equation to increase affordable housing supply is to provide incentive to renovate existing homes, especially in areas where housing quality is an issue. However, we were told that there “currently is not a real plan to replace housing (lots of vacant units) that could be renovated or replaced.” A carrot and stick approach is warranted, “[We] need to introduce some accountability to property owner to motivate them to keep their properties up and an maintain them. Once a property reaches a certain point it is likely

beyond needing just maintenance and the cost may be prohibitive in repairing it.” One strategy according to a participant, is for the City to designate “Redevelopment Zones” which could accommodate an increase in density and serve as the location for mixed-use and mixed-income developments. “Increasing allowable density creates a significant amount of value for existing property owners and creates an incentive to redevelop older (and presumably less expensive) housing stock.” Another strategy mentioned would be to implement “Equitable Code Enforcement,” to address properties that do not meet the minimum housing code. “Equitable code enforcement occurs when a local government implements a strategic approach that brings housing up to code while limiting widespread condemnation and demolition that could lead to displacement of residents.”

#### ***Revise Land Use & Zoning to Encourage Affordability in High Opportunity Areas***

Goldsboro’s land use policies and zoning play a direct role at promoting or limiting affordable housing opportunities. “Goldsboro is very land strapped and a number of properties are being held off the market. With the right policies could be

made usable and available for housing: Suggestions included using Opportunity Zones to attract investors in areas identified for improvement and included a “loosening” of some of the city’s regulations in order to incentivize investment. Another suggested strategy was using “Voluntary Inclusionary Up-zoning” in areas which would connect greater housing development to incentives for affordable housing. “This strategy differs from mandatory inclusionary zoning which requires developers to build affordable housing. Instead, the voluntary inclusionary up-zoning would be a voluntary option for developers who are willing to provide affordable housing in exchange for incentives. For example, the City could allow a zoning change which permits a developer to have taller building height or greater density in exchange for the developer including a portion of affordable housing units.” Finally, “Affordable Housing Overlay Zones” could offer developers incentives to build affordable housing including streamlined permitting process, increased density bonus, lower parking restrictions, increased building heights or allowing housing development in locations not zoned for residential uses.” Another suggestion

was to allow “Accessory Dwelling Units” by right. “Accessory dwelling units can provide additional affordable housing, especially for aging seniors, on certain existing residential properties.” Another transit-oriented suggestion was to strengthen connections between affordable housing, transit, and workforce development programs. “Cities benefit when residents can easily travel between employment opportunities and reasonably priced housing. When city leaders collaborate with local workforce and transportation agencies alongside larger local employers, it can result in transit-oriented development which spurs both the creation of affordable housing units with price protections for lower-wage earners and reliable transportation to employment opportunities for communities.” Land acquisition and banking function for the use of affordable housing is another possible strategy. “Goldsboro could acquire vacant sites from absentee landlords and then partner with private or nonprofit developers to build affordable rental units. Local sourced trust funds and partnerships with

philanthropies are important partnerships to have in light of diminishing federal resources for home ownership and stabilization of city owned properties.” None-the-less, with the 2018 passage of NC House Bill 573, municipalities can request to appoint a receiver to address vacant structures that have not complied with code enforcement orders. A pilot for a Vacant Housing Receivership Program is currently being tested in the City of Greensboro<sup>22</sup> and has been discussed at length by legal scholars at the UNC School of Government.<sup>23</sup>

Finally, expanding and improving code enforcement activity was suggested, “better enforcement of housing codes to improve housing quality – Eliminate housing in which when inside when you look up you can see the sky and when you look down you can see the ground. Some landlords don’t see these conditions in their units.”

Importantly interviewees recognized that multiple strategies are needed at once. “The solution to affordable housing needs to be multi-types based. For some, like the

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<sup>22</sup> See <https://www.greensboro-nc.gov/departments/neighborhood-development/code-compliance/minimum-housing-standards-commission/vacant-housing-receivership-program>

<sup>23</sup> See <https://www.sog.unc.edu/blogs/coates-canons/receivership-new-tool-addressing-vacant-problem-properties-north-carolina>

homeless, tiny houses can be an option for some. For others, the solutions need to be based on family needs and in terms of space, access to school, work, shopping, and services.”

### ***Prevent Displacement***

Displacement, due to condemnation, gentrification, revitalization, disaster, or other causes is a destabilizing issue that impacts the health of the housing market and the lives of those who are supplanted. An interviewee suggested, “one strategy to help long-term residents remain in their neighborhoods is for the City to create a Housing Assistance Displacement Program, especially for renters. Although the City should minimize the number of residents displaced, those who will be displaced should have the opportunity to seek program support to relocate within their neighborhoods. This Housing Assistance Displacement Program could help residents faced with involuntary displacement with resources including, but not limited to, finding another affordable home (City staff assistance or local non-profit partner assistance); providing a security deposit for a new home; paying utility connection fees; and offering first month’s rent for a new

home.” This idea of deposit and utility connection fee assistance was echoed by several of the homeless service agencies as well.

### ***Increase Well-Paying Opportunities***

Ultimately, housing affordability is as much an issue of low wages as it is an issue of high cost of housing. Participants noted that the City needs a magnet to attract investment and interest in moving into neighborhoods in the where there is affordable housing. “The “magnet” has several facets. One is to improve affordability of living in Goldsboro with good paying jobs and reasonable taxes. Another is to make the city more attractive as a place to live. This involves increasing the availability of affordable housing. These homes are not likely to be the areas in the city that are the most expensive or the most desirable – but there are many places where unoccupied housing units could be renovated to help revitalize once thriving areas of the city.” This is an interesting suggestion that underscores the cyclical relationship between housing and employment. If there is affordable, quality housing employers may see Goldsboro as a good place to establish their companies. If more employers move to Goldsboro, wages

will be better, and residents will be able to afford better housing. The relationship with workforce readiness was also noted, “Improve course offerings in school that would enable more students to acquire employable skills like welding and nursing. Make school less of a “required” process in life and more of a destination for learning useful, useable, and meaningful skills and information. More residents would be more employable and being able to afford housing.” Thus by providing employers with a higher-skilled workforce and better workforce housing more will invest in Goldsboro and in-turn more Goldsboro residents will be able to afford better housing.

### ***Improve Neighborhood Schools***

Many residents are unhappy with the quality of education their children receive. “County schools are viewed as better and many white families have moved out of the city since the 1990’s. Affordable housing cannot be adequately addressed without addressing the issues of perceived low-quality schools.” This idea of improving the schools in the City resonated throughout our interviews, “they

have declined and there is no real plan to address this. They have had performance issues with superintendents including possible misuse of funds.<sup>24</sup> The flow of more affluent families away from neighborhoods served by many of the City schools has meant less investment and less interest in investment in the schools and the neighborhoods that send children to these schools.” Clear evidence of the impact of schools is seen in the previous section on School Proficiency Index (p 89).

### ***Increase Fair Housing Awareness***

Awareness of fair housing issues and resources is ultimately a public-relations and community education issues. Although methods such as advertising on the City’s webpage and placing advertisements in the paper engage a certain amount of Goldsboro’s citizens, utilizing additional methods could have greater impact since some residents do not have a newspaper subscription or access to the internet. Additional methods such as mailing pamphlets (or including them as inserts in utility bills or other correspondences) to residents informing them of important

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<sup>24</sup> See <https://jocoreport.com/wayne-superintendent-resigns-after-disclosing-4-8m-budget-deficit/>



housing meetings and projects and engaging local organizations and churches to advertise important housing information would be beneficial for many residents. It is important to “educate the community as to what affordable housing is and address common misconceptions. It’s important to express that public housing and affordable housing aren’t mutually exclusive.”

### ***Commission a Comprehensive Affordable Housing Plan***

Repeatedly we heard that comprehensive planning was an issue in Goldsboro. “The City has a Comprehensive Plan but has allowed only minimal public input. [It] appears to not be interested in a diversity of opinions.”

In order to develop affordable housing in a fair or equitable manner, there should be a City-wide comprehensive affordable housing policy or plan. This comprehensive affordable housing policy or plan could provide details on strategies, including land use strategies, that will be used to increase affordable housing throughout the City. This policy or plan would be a roadmap for affordable housing development in Goldsboro, and it could provide transparency to the public on how

affordable housing goals will be accomplished. Other jurisdictions in North Carolina have affordable housing plans which provide details on achieving affordable housing goals. Examples include large cities, counties, and small towns across the state including the Town of Apex, town of Cary, City of Greensboro, City of Asheville, City of Wilmington and New Hanover County, City of Raleigh, City of Charlotte and Mecklenburg County, Wake County, Town of Carrboro, Town of Wake Forest, etc. An affordable housing master plan for the community would thus provide for those working in the housing arena to work with the City more effectively and with each other more effectively to better address the needs of the residents.

### ***Create an Affordable Housing Task Force or Commission***

As part of comprehensive planning, the City of Goldsboro should develop an Affordable Housing Task Force. “There is no central “authority” focusing on the welfare of people in need of affordable and safe housing. The system is fragmented.” The City should create an Affordable Housing Task Force or Commission to help promote fair housing and community development

initiatives. “This Task Force or Commission could be made up of various stakeholders such as City leaders, local residents, private developers, faith-based leaders, the Housing Authority, and other housing

advocates. The City of Rocky Mount’s Workforce Housing Advisory Commission could serve as an example or model for guidance.”

# IMPEDIMENTS & GOALS

## **Impediment 1: Lack of Affordable Rental Housing**

Lack of affordable rental housing arose repeatedly in the data. Nearly half of renters (47%) were cost burdened paying more than 30% of their income towards rent. Housing affordability repeatedly was discussed in interviews, clear in survey data, and throughout the secondary data analysis.

### ***Goal 1: Promote Preservation of Existing and Development of New Affordable Rental Housing***

Promote and encourage the development of affordable market rental housing units especially for households within 80% to 120% range and supported housing for those whose incomes are less than 80% of the Area Median Income. The strategies to meet this goal include:

- Ease land-use regulations and zoning laws by tying funding to voluntary inclusionary zoning and Affirmatively Furthering Fair Housing practices.
- Emphasize low-income housing and development that provide affordable housing options outside of current areas of concentration.
- Encourage public/private incentives and use of Low-Income Housing Tax

Credits, Community Reinvestment Act (CRA) money, and Community Development Financial Institutions (CDFI) funds.

- Preserve current affordable housing by purchasing more of the Naturally Occurring Affordable Housing (NOAH) stock and converting units to subsidized programs like Section 8 Housing Choice Vouchers as subsidized units are often easier to preserve than unsubsidized units.
- Decrease the concentration of public sector housing in areas of high poverty. Scattered site public housing was intended to de-concentrate poverty and race. Future construction of public housing such as Section 8 Project-Based Rental Assistance (PBRA) should be located in high-opportunity areas near employment, transportation, food, and medical services.
- Expand resources for preservation of unsubsidized rental units through lead-safe housing program, weatherization, and repair programs.
- Work with the Goldsboro Housing Authority to strategically expand public assistance to the 4,256 households that are cost burdened, particularly, those households below 50% of the median family income.

- Increase the jurisdictions and enforcement of *Minimum Housing Standards* and Code Enforcement while also providing resources to elevate housing quality to these standards by increasing funding for emergency repair programs, low-interest loans for rental housing, and forgivable loans to low-income homeowners using HOME funds.
- Support use of orders to repair, first-order liens, and receivership on rental properties that are vacant and in disrepair in order to move stock back into active use.
- Support land-use planning that increase affordable development opportunities including examination of minimum lot requirements which prohibit density and affordable housing.
- Reclaim tax delinquent, vacant, and underutilized parcels possibly through land-banking or other mechanisms.

## **Impediment 2: Lack of Affordable Housing for Sale**

Lack of affordable single-family housing was also found in the data. About a quarter of homeowners (25.0%) were cost burdened. The recent increase in the cost to purchase a single-family home may significantly limited the choice of housing for moderate income households.

## ***Goal 2: Promote and encourage the development of for-sale single family houses for low- and moderate-income households.***

Homeownership rates have declined by 13.5% since 2000 (ACS 2015-2019). Promote and encourage the development of for-sale single family houses for low- and moderate-income households. The strategies to meet this goal include:

- Continue to support down-payment assistance programs and mortgage financing to assist low-income homebuyers to purchase housing outside areas of RECAPs and areas of concentrated poverty/race.
- Support rehabilitation of existing owner-occupied housing stock to increase the supply of decent, safe, sound, and sanitary housing that is affordable to low-income households.
- Increase participation in existing homebuyer education and training programs to improve homebuyer awareness and increase the opportunities of fair housing choice for low-income households.
- Support non-profit developers like Habitat for Humanity who develop owner-occupied housing.
- Support land-use planning that increase affordable development

opportunities by increasing density by right.

- Institute title-clearing clinics with civil legal service providers, law schools, and pro-bono clinicians to address heir property issues.

### **Impediment 3: Private Lending Practices**

The analysis of fair lending has provided clear evidence, consistent with studies of HMDA data in other locations, that race/ethnicity is yet a major factor in loan approvals in the City of Goldsboro. When controlling for all factors (within the limitations of the dataset), odds of loan approval were significantly lower for Non-Whites (>50% less likely for loan approval for African American). Definitive causes for the disparities cannot be found within the HMDA data as it does not track all of the variables which play a part in the loan approval process. However, given the evidence of inequality it is recommended that the City engage in the following activities to reduce the disparities in mortgage approvals:

1. **Institutional Analysis** - Conduct further institutional studies in order

to determine which institutions have the most disparate outcomes by race/ethnicity. With some effort, the existing dataset may be joined with descriptive data on each of the lending institutions to investigate the patterns of loan approvals and denials. This research may be beneficial in identifying which institutions have a record of consistently denying loans from particular race/ethnic minorities. This would allow for targeted fair-lending testing such as outlined in Turner, Freiberg, Godfrey, Herbig, Levy, and Smith (2002).<sup>25</sup> This analysis could also be used to identify best-practice lenders, awarding them a City of Goldsboro Fair Housing “Stamp of Approval” or similar incentive.

2. **Home Buyer, Credit Building Courses** – Expand the scope and reach of courses which train prospective tenants with stable incomes on how to begin the process of building credit and applying for a loan. Credit history was the primary cause of denial in known cases. It may be of use for lending institutions and those promoting homeownership to provide workshops in target areas that would teach prospective buyers how to improve their credit ratings

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<sup>25</sup> <https://nyuscholars.nyu.edu/en/publications/all-other-things-being-equal-a-paired-testing-study-of-mortgage-l>

and prepare for the loan application process well before beginning the search for a home. This could both lower the overall denial rate and improve home ownership within target communities. This could be done in coordination with lenders who have a track record of equitable lending practices and could be targeted to particular communities identifies in GIS analysis.

The HMDA data suggests that there is a disparity between the approval rates of home mortgage loans that are originated from white and minority applicants. Access to credit and approval rates for all originated home mortgage loans should be fair, unbiased, and impartial throughout the jurisdiction, regardless of race and location.

***Goal 4: Improve access to credit for minorities.***

Improve access to credit for minorities. The strategies to meet this goal include:

- An in-depth review of the mortgage lending practices by local banks should be undertaken by an outside agency or firm, that does not have any interest in the local financial institutions.
- Testing should be performed by an outside agency like NC Justice to determine if any patterns of discrimination are present in local home mortgage lending practices by

brokers and representatives in low-income areas.

- Provide higher rate of public financial assistance specifically in lower-income areas to improve the loan to value ratio so private lenders will increase the number of home loan mortgages made in these areas. Currently, there are six block groups where 75% or more housing units are rental. By designating specific 'renaissance' or 'reinvestment' zones, these neighborhoods could reach a more balanced level of owners vs. renters.
- Develop a homebuyer credit repair workshop, separate from the existing homebuyer education courses, but tied to down payment assistance upon successful completion of the program. These programs take about six months for initial credit repair to address disputes and address derogatory marks. Programs may take up to several years to build a credit score that is adequate for homebuying in the commercial market. When partnered with homebuyer education courses and alternative credit sources like NCHFA, Self-Help, and social-impact lenders, these programs can be effective in increasing the pool of potential homebuyers by permitting loan approval with lower credit scores.

## **Impediment 4: Fair Housing Education and Outreach**

Lack of awareness of fair housing laws and principals were evident in the interviews with key informants. Further training of housing, planning, and non-profit professionals and public officials was also evident. Thus, there is a continuing need to educate persons about their rights under the Fair Housing Act and raise awareness of fair housing choice as well as protections and what to do if a violation has occurred.

### ***Goal 4: Improve the public's knowledge and awareness of the Fair Housing Act, and related laws, regulations, and requirements.***

Improve the public's knowledge and awareness of the Fair Housing Act, and related laws, regulations, and requirements.

The strategies to meet this goal include:

- Conduct local media campaign to educate the public, public officials, and housing providers.
- Promote fair housing seminars to provide educational opportunities for all persons to learn about their rights under the Fair Housing Act.

- Publish literature and informational material in English and Spanish to pass out concerning fair housing issues and place in prominent locations to be available for distribution.
- All housing counselors, Section 8 managers, landlords, and agents, and staff of assisted housing properties should continue to be required to attend mandatory Fair Housing trainings.<sup>26</sup>
- County planners, economic development professionals, economic development agencies, and the local Chambers of Commerce should be targeted for additional training as they represent investors and the business community who often block affordable housing development.
- Outreach activities at all levels should be targeted to immigrants and to persons who are not proficient in English.

## **Impediment 5: Accessible Housing**

Persons with disabilities, whether mental or physical, are often overlooked in analysis of fair housing practices. Interviews, surveys, and the data analyzed indicate that many

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<sup>26</sup> Some jurisdictions require Owner Certification Training courses <https://section-8-housing.org/information-for-section-8-landlords-section-8-housing/>



community members have disabilities that may affect their choice of housing.

***Goal 5: Improve accessibility of housing for those with disabilities.***

Improve accessibility of housing for those with disabilities. The strategies to meet this goal include:

- Increase the number of accessible housing units through rehabilitation of the existing housing stock.
- Increase the number of accessible housing units through the development and construction of new rental and single-family homes for sale.
- Enforce the ADA requirements for landlords to make “reasonable” modifications to rental properties to make housing units accessible to disabled tenants.
- Provide financial assistance to homeowners to make their properties accessible in order to allow them to remain in their residences.
- Encourage builders to use Universal Design principals in all new construction by tying incentive funding to accessibility.

## **Impediment 6: Lack of Affordable Housing Plan**

It was quite clear from public feedback – the residents of Goldsboro want an affordable housing plan that takes into consideration low- and moderate- income residents’ needs and most importantly listens to their voices. Comprehensive planning efforts too often appease developers and NIMBYist community organizations and ignoring the root causes of inequality.

***Goal 6: Assemble an Affordable Housing Steering Committee and Commission a 10-Year Plan to Address Affordable Housing***

- Establish a Steering Committee.
- A strong Affordable Housing Steering Committee with support from City Council and Management is essential for helping develop a plan that will balance resident concerns, municipal financial limitations, and developer needs. The Committee should have full authority to affirmatively promote Fair Housing including the ability to enforce fair housing laws, research impediments, and address barrier through policy and action plans.
- The Committee should examine the feasibility of opening a HUD Fair Housing Assistance Program (FHAP) to engage in enforceable paired

testing and to investigate complaints and to vigorously pursue civil and/or criminal penalties against violators.

- The Committee should develop, with community members and stakeholders, a 10-Year Affordable Housing Action Plan that coordinates and articulates with local/regional transportation planning, economic development, and comprehensive development plans in the City and Wayne County. The 10-Year Plan should help the City, the Public Housing Authority, and the various non-profit housing agencies focus efforts on addressing Race/Ethnic Concentrations of Poverty, eliminating blight, preserving current affordable

housing, and increasing new affordable housing stock – especially in homeownership opportunities for moderate- to low-income households and in areas where home ownership is very low.

- Establish multiple financial mechanisms for sustainable investments in housing including Low-Income Housing Tax Credit (LIHTC) opportunities, revolving loan funds from philanthropy, Community Land Trusts (CLT), Medicare/Medicaid expansion funding for improving housing quality, and Community Development Financial Institutions (CDFI)-friendly practices.<sup>27</sup>

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<sup>2727</sup> <https://www.cdfifriendlyamerica.com/>

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## Appendix A – Interview Instrument

Interviewee: \_\_\_\_\_

Date: \_\_\_\_\_

County: \_\_\_\_\_

Time: \_\_\_\_\_

### Introduction

Good Morning/Afternoon/Evening, my name is \_\_\_\_\_, calling on behalf of the City of Goldsboro. Am I speaking with \_\_\_\_\_?

I work with the UNCG Center for Housing and Community Studies, and we are assisting the City of Goldsboro by interviewing stakeholders concerning possible impediments to housing choice in your area. You should have received an email from me a few days ago to schedule this interview.

Is this still a good time to talk, or would you prefer that I call back at another time?

**IF NO:**

**NOTE Callback time/date here:**

### IF YES: (PROCEED WITH THE FOLLOWING)

Thank you so much for agreeing to this interview; your participation is critical to providing a complete and accurate understanding of the fair housing impediments in our region. Please be assured that your answers will not be used outside of the study and only aggregate responses will be utilized in the final report. No specific response will be identified with any specific key informant. I will be speaking with community leaders across Goldsboro. Is it okay with you if we record this interview for transcription purposes?

**IF YES:**

Alright, please give me a few seconds to begin recording this call.

### INTRODUCTION

1. Describe your organization's role in the development, improvement, provision, or protection of housing in the Goldsboro area?

2. What are your responsibilities within your organization?

3. What do you think currently is *working well* with regard to promoting access to affordable and decent housing in Goldsboro?

4. Is anything *not working well* with regard to affirmatively furthering access to housing for people of color, people from other countries, families, women, or people with disabilities? In other words, are there any barriers for people in any of these classes for finding affordable and decent housing in Goldsboro?

5. Are there any particular protected classes that experience barriers to accessing housing in your jurisdiction?
- *Protected classes include: Race, Color, Religion, Sex, Handicap, Familial Status, National Origin.*

6. Which population groups are most in need of housing? Why?
- Middle-income, low-income or both?

- Workers, students, the elderly, persons with disabilities, single-parent and female-headed households, people of color?

**7. Where is most of the affordable and workforce housing located now?**

**8. Are there areas or neighborhoods where it is more difficult for people to find housing?**

- Where should more be added?

**9. What one thing would you do to address access to fair, affordable, and healthy housing in Goldsboro?**

**10. Is there a *single policy change that would make a difference* in improving the current state of access to fair housing and community resources?**

- What strategies could support its success?

## **CONCLUSION**

11. You're the expert in this field. Have we asked the right questions? Are there ones we should have asked but haven't?

12. Who else should we talk to Goldsboro regarding impediments to fair housing choice?