



NC DEPARTMENT
of COMMERCE
RURAL ECONOMIC
DEVELOPMENT



NCDHHS



**NORTH
CAROLINA
HOUSING**
FINANCE AGENCY

2026-2030 Consolidated Plan

2026 Annual Action Plan

State of North Carolina

Community Development Block Grant (CDBG) Program

Draft Updated | 05-22-2026

This Document will include several updates until submitted to HUD

2026–2030 Consolidated Plan

2026 Annual Action Plan

State of North Carolina

Community Development Block Grant (CDBG) Program

DRAFT UPDATED | MAY 22, 2026

This document is subject to revision and will continue to receive updates prior to submission to HUD.

Executive Summary

ES-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The North Carolina Consolidated Plan 2026-2030 was developed in accordance with the Consolidated Plan regulations set forth in 24 CFR Part 91 and with the requirements set forth by the U.S. Department of Housing and Urban Development (HUD). The Consolidated Plan serves two purposes. First, it is the planning document that guides the North Carolina Consolidated Plan Partners in addressing housing and community development needs across the state for the next five years, using the allocated funds received from HUD. Secondly, this plan serves as a tool to inform a variety of stakeholders — including HUD, state and local officials, non-profit and advocacy organizations, and the residents of North Carolina — of the need for improving the living conditions for our state’s residents, especially the very low-, low-, and moderate-income populations.

A copy of the approved Consolidated Plan 2026-2030 which includes the 2026 Annual Action Plan, will be posted on the North Carolina Department of Commerce's website at www.commerce.nc.gov.

The 2026-2030 North Carolina Consolidated Plan includes six programs funded by HUD: the Community Development Block Grant (CDBG) program, the HOME Investment Partnerships (HOME) program, the national Housing Trust Fund (HTF), Recovery Housing Program (RHP) the Emergency Solutions Grants (ESG) program, and the Housing Opportunities for Persons with Aids (HOPWA) program. Additionally, the State is also administering the CDBG Disaster Recovery (CDBG-DR) programs through the Division of Community Revitalization. The State of North Carolina received an award of 1.4 billion dollars after Hurricane Helene. The RHP requires its own Action Plan and will be described in a separate Action Plan. Lastly, the State is also in the last stages of implementing the funding for CDBG Coronavirus (CDBG-CV), ESG Coronavirus (ESG-CV), and HOPWA Coronavirus (HOPWA-CV). These funds were included in an amendment to the North Carolina 2019 Annual Action Plan, but updates will be provided in subsequent annual reports.

The Consolidated Plan, its related Annual Action Plans, and Consolidated Annual Performance and Evaluation Reports (CAPER) are developed by the North Carolina Plan Partners. The partner state agencies include the North Carolina Department of Commerce which administers the CDBG and RHP programs, the North Carolina Housing Finance Agency which administers the HOME and HTF programs, and the North Carolina Department of Health and Human Services which administer the ESG and HOPWA programs. The North Carolina Office of Community Revitalization which implements the CDBG-

DR program continues to concentrate the recovery efforts from Hurricane Helene in the western part of the state.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

North Carolina will strategically invest its federal and state resources, partner with public and private organizations, and leverage non-governmental funds to alleviate critical housing, economic, and community development problems for North Carolina's households. This will be achieved through the following five goals:

1. Increase Housing Affordability and Availability: The affordability and availability of decent housing stock remains a dominant need in North Carolina. Among other needs, Hurricane Helene highlighted the importance of housing stability and the need for quality short-term, transitional, and permanent housing stock. Further, the Housing Needs Assessment revealed that NC is a growing state, particularly in urban areas; housing costs are unaffordable for about 380,000 low-income owner households and 535,000 low-income renter households; housing overcrowding is substantial; and over 10,000 individuals are homeless in the state.

In response, NC will strive to preserve and develop quality, affordable housing by increasing affordable rental homes, providing access to homeownership, and improving owner-occupied housing.

2. Provide Suitable Living Environment: While quality housing is essential, a suitable living environment is also. NC will support the provision of a suitable living environment by funding infrastructure especially water and sewer improvements to address deteriorated systems; providing public services such as short-term housing, emergency payments for rent, mortgage, and utilities, and food distribution; and preserving and creating public facilities such as community centers, parks, transitional housing, supportive housing, and emergency shelters.

3. Expand Economic Opportunity: NC will use its resources to spur economic development by creating and retaining jobs.

4. Stimulate Housing and Economic Inclusiveness: Ensure that all residents have valued information to assist with expanding job opportunities and the resources funding opportunities to start a business.

5. Respond to Hurricane Helene and its rebuilding efforts. The recovery efforts in Western NC will take years. The State and well as the federal government have made sizeable investments in new housing, infrastructure improvements and other public service and non-housing community development activities.

3. Evaluation of past performance

Through its five core programs, the state demonstrated continued success to assist low-to-moderate income persons and households. The NC Department of Commerce provided direct housing assistance to households. Considering all of NC Commerce's programs, including infrastructure, urgent needs, and other community development activities, households were aided ranging from clean drinking water, improved public services, and financial literacy training to help lift them out of poverty, to employment possibilities that were non-existent prior to the business moving to where they lived, and access to medical and dental care that was previously unobtainable. HOME funding continued to provide housing opportunities through down payment assistance, housing rehabilitation, financing, and other housing programs to enrich and improve the quality of life of low- to moderate-income persons across the state. ESG and HOPWA continued to address the needs of the most critically distressed citizens of North Carolina by providing shelter to the state's homeless population and individuals with special needs including those with HIV/AIDS and other related needs. The programs designed by each agency to address needs ranging from the most critical to moderate had a major impact on the citizens of this state as has been outlined each year in the Consolidated Annual Performance Evaluation Report (CAPER).

4. Summary of citizen participation process and consultation process

This information will be updated once the public hearing has taken place.

5. Summary of public comments

This information will be updated once the public hearing has taken place.

6. Summary of comments or views not accepted and the reasons for not accepting them

This information will be updated once the public hearing has taken place.

7. Summary

This information will be updated once the public hearing has taken place.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	North Carolina	NC Department of Commerce
HOPWA Administrator		NC Department of Health and Human Services
HOME Administrator	North Carolina	NC Housing Finance Agency
ESG Administrator		NC Department of Health and Human Services
HTF Administrator	North Carolina	NC Housing Finance Agency

Table 1 – Responsible Agencies

Narrative

Consolidated Plan Public Contact Information

John F. Brooks CDBG Section Chief Office 919-814-4663 or john.brooks@commerce.nc.gov

PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)

1. Introduction

Consultation and coordination among other state agencies and nonprofits have become increasingly important due to the destruction of homes, infrastructure, and non-housing community development projects with Hurricane Helene and its devastation in Western North Carolina, natural disasters, and the public health emergency due to COVID-19. To increase coordination, the state has several housing and community development policy bodies including the Interagency Council for Coordinating Homeless Programs (ICCHP) and the North Carolina Housing Partnership.. The Governor of NC after Hurricane Helene established a new division in the Department of Commerce to aid with coordination with Hurricane Helene relief efforts. For the State's Consolidated Planning efforts, the NC Plan Partners oversee the planning, implementation, and reporting for HUD CPD programs. In this role, the NC Plan Partners specifically sought input and consulted with COC's, CDBG grantees, ESG grantees, the HIV/AIDS service organizations, local health departments, mental health and substance abuse providers, Family Health Centers, and public housing authorities, in addition to the broader public while developing the 2026-2030 Consolidated Plan.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I)).

The state encourages participation among housing professionals, non-profit agencies, local government entities, and service agencies. The state has a coordinated planning process with its other HUD formula recipients in developing all HUD required plans. The NC Plan Partners have consistently reached out to other organizations such as the North Carolina Coalition to End Homelessness, NC Justice Center, and Legal Aid of North Carolina. The state solicits feedback during the comment phase of each plan by posting information on multiple websites. Information is also shared through listservs and contact databases. The state conducted regional meetings seeking feedback of its Housing Choice Plan and will hold one final public meeting prior to submission of the Consolidated Plan, Annual Action Plan. The state also conducted a survey this year that was coordinated with many agencies throughout the state.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

The NC Department of Health and Human Services coordinates with the NC Coalition to End Homelessness to provide fiscal and programmatic assistance to local Continua of Care (CoC). The Coalition also serves as an advocate on behalf of CoCs regarding policy and funding. Frequent dialogue is maintained with members of the CoC and the Coalition to End Homelessness. Specifically, within the

RFA, each CoC makes recommendations to the state in determining local priority needs, funding, performance standards and outcomes for chronically homeless individuals and families, families with children, as well as veterans. Each CoC membership is composed of representatives that serve and advocate for the provision of services to homeless persons. Membership includes homeless providers, local departments of social services and mental health, city and county agencies, housing and community developers, and staff representing corrections, domestic violence, public housing authorities, hospitals, and veterans.

In addition to the above, staff members at the North Carolina Housing Finance Agency serve roles with the NCCEH Balance of State CoC – one serves on the HMIS Advisory Board and another serves on the CoC Governance Board.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS.

See the response to the previous question. This initiative is coordinated by the NC Department of Health and Human Services.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

Agency/Group/Organization	Agency/Group/Organization Type	What section of the Plan was addressed by	How was the Agency/Group/Organization consulted and what are the anticipated outcomes
Continuum of Care			

Table 2 – Agencies, groups, organizations who participated

Identify any Agency Types not consulted and provide rationale for not consulting

The State of North Carolina develops, implements, and reports on the Consolidated Plan through the North Carolina Plan Partners. The NC Plan Partners consists of the North Carolina Department of Commerce (the lead agency), the North Carolina Housing Finance Agency, and the North Carolina Department of Health and Human Services. Additionally, these agencies seek input from the NC Department of Environmental Quality, the Broadband Infrastructure Office of NC Department of Information Technology, and the NC Division of Community Revitalization. Consolidated Plan related documents are posted for review and comments on the North Carolina Commerce website and the UNC School of Government Listserv for city and county managers. The drafts are also emailed to stakeholders that include local governments, COCs, consultants, and other state agencies

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care		

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(l))

Narrative (optional):

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

- 1. Summary of citizen participation process/Efforts made to broaden citizen participation
Summarize citizen participation process and how it impacted goal-setting**

This section will be added once the public hearing has taken place.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

North Carolina is a growing state with an increasing population and an increasing housing demand. The anticipated growth will lead to an older and more diverse population; however, the growth is not anticipated to be uniform, with greater growth expected in more urban areas.

An affordable housing supply gap exists and is expected to grow during the years covered in this Consolidated Plan with a greater need for access to affordable housing among several population groups, including lower income, elderly, disabled, veteran, homeless, or victims of domestic violence. Additionally, Black, Asian, Pacific Islander, and Hispanic households earning below median income have significant housing needs. Overall, those with the lowest incomes are more likely to experience cost burden, overcrowding, housing condition problems, and be at risk of experiencing homelessness.

Homelessness in North Carolina has been increasing in recent years. From 2023 to 2024, the number of individuals experiencing homelessness increased by 19%. Thousands of North Carolinians are currently experiencing homelessness. As of January 2024, there were over 10,000 individuals experiencing homelessness in North Carolina. North Carolina experienced an especially larger growth of those sleeping in unsheltered locations.

NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

North Carolina is the ninth most populous state in the country. The population is expected to reach 11.7 million by 2030, and the state is expected to be the seventh most populous in the nation by the early 2030s. The resulting population is projected to be an older, more diverse population. The North Carolina Office of State Budget and Management (OSBM) projects that one in five North Carolinians will be at least 65 years old by 2030. By 2060, it is anticipated that 48% of the population will be Hispanic, non-Hispanic American Indian, non-Hispanic Asian or Pacific Islander, Non-Hispanic Black, or Non-Hispanic Multiracial. Growth is not expected to be equally distributed across the state; between 2025 and 2030 it is expected that 16 counties (all but one being rural counties) will experience population loss. Changes in population impact the supply and demand of housing and are a key consideration in the provision of affordable housing. [NC Office of State Budget and Management]

Low-, very low- and extremely low-income households in North Carolina are spending a disproportionate amount of their incomes on housing. Housing cost burden affects 24.6% of the state's households and this percentage is even greater for extremely and very low-income households. Extremely low-income renters are most likely have severe cost burdening: 57.0% pay more than half their income for rent. Approximately 78.9% of very extremely low-income renter households and 68.6% of very low-income renter households are cost-burdened, along with 37.8% of low-income renter households. Higher percentages of low-income renters are cost-burdened than low-income owners. [2016-2020 CHAS]

Extremely low-income and very low-income renter households are more likely to reside in substandard or severely overcrowded housing than other renters and owners of any income category. There are 77,730 North Carolina households with incomes below 80% AMI (area median income) who live in crowded conditions or substandard housing. [2016-2020 CHAS]

Extreme housing conditions can be found throughout the state, in Eastern, Western, Central, and Metro counties. According to CHAS data, rural areas have 40% higher rates of inadequate kitchen or plumbing facilities than suburban areas. Higher rates of severe crowding (more than 1.5 people per room) were found in urban and suburban counties. [2016-2020 CHAS]

Demographics	Base Year: 2009	Most Recent Year: 2020	% Change
Population	9,845,194	10,386,227	5%
Households	3,775,659	4,031,592	7%
Median Income	\$0.00	\$56,642.00	

Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	522,475	503,625	719,130	429,675	1,856,690
Small Family Households	149,770	157,885	254,415	172,255	965,265
Large Family Households	29,545	35,320	50,925	32,220	129,090
Household contains at least one person 62-74 years of age	116,025	125,635	174,080	102,450	444,875
Household contains at least one person age 75 or older	80,135	94,355	100,190	47,090	147,080
Households with one or more children 6 years old or younger	81,495	79,220	105,855	61,635	211,650

Table 6 - Total Households Table

Data 2016-2020 CHAS
Source:

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	6,295	4,685	3,055	1,430	15,465	2,580	1,715	1,780	1,220	7,295
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	4,725	4,565	3,190	2,245	14,725	955	1,135	1,865	1,085	5,040
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	9,985	9,325	8,740	3,135	31,185	2,720	3,940	6,475	3,020	16,155
Housing cost burden greater than 50% of income (and none of the above problems)	179,950	63,600	11,365	1,255	256,170	100,105	50,365	29,270	6,145	185,885

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	37,190	110,080	103,465	16,890	267,625	36,555	63,265	91,075	39,095	229,990
Zero/negative Income (and none of the above problems)	31,915	0	0	0	31,915	21,265	0	0	0	21,265

Table 7 – Housing Problems Table

Data 2016-2020 CHAS
Source:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	200,960	82,175	26,350	8,060	317,545	106,360	57,155	39,395	11,470	214,380
Having none of four housing problems	114,890	171,150	277,350	141,750	705,140	100,270	193,145	376,035	268,400	937,850

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Household has negative income, but none of the other housing problems	0	0	0	0	0	0	0	0	0	0

Table 8 – Housing Problems 2

Data 2016-2020 CHAS
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	83,690	69,080	42,330	195,100	31,950	32,905	41,895	106,750
Large Related	15,825	11,555	5,210	32,590	6,660	7,860	6,930	21,450
Elderly	50,200	41,065	19,345	110,610	73,315	57,220	49,245	179,780
Other	83,550	62,905	50,910	197,365	28,095	17,520	23,780	69,395
Total need by income	233,265	184,605	117,795	535,665	140,020	115,505	121,850	377,375

Table 9 – Cost Burden > 30%

Data 2016-2020 CHAS
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	0	0	20,950	20,950	25,010	14,330	0	39,340
Large Related	0	0	2,285	2,285	4,770	2,585	955	8,310

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Elderly	37,300	16,555	3,840	57,695	49,975	25,125	14,185	89,285
Other	0	73,825	26,160	99,985	22,735	0	0	22,735
Total need by income	37,300	90,380	53,235	180,915	102,490	42,040	15,140	159,670

Table 10 – Cost Burden > 50%

Data 2016-2020 CHAS
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	13,120	11,505	9,040	4,140	37,805	3,105	4,310	6,670	2,755	16,840
Multiple, unrelated family households	1,020	1,810	2,260	675	5,765	560	795	1,695	1,225	4,275
Other, non-family households	770	890	850	650	3,160	80	30	115	195	420
Total need by income	14,910	14,205	12,150	5,465	46,730	3,745	5,135	8,480	4,175	21,535

Table 11 – Crowding Information – 1/2

Data 2016-2020 CHAS
Source:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	84,018	72,648	104,442	261,108	44,186	52,840	99,935	196,961

Table 12 – Crowding Information – 2/2

Alternate Data Source Name:
2023 ACS Public Use Microdata Sample

Data Source
Comments:

No CHAS tables contain info about children and crowding.

Describe the number and type of single-person households in need of housing assistance.

North Carolina has 1.16 million single person households, many of whom are elderly and/or low-income. This also includes single person households with disabilities and single person households who are experiencing homelessness. It is common for members of these populations to need housing assistance.

Of those 1.16 million one-person households across the state, 54.9% of these households are owners, while 45.1% are renters. 39.1% of 1-person households are elderly (65+). [ACS 2016-2020 data]

Households with lower incomes are more likely to experience challenges with housing affordability. The median income for a 1-person household in 2016-2020 ACS was \$30,401, significantly lower than the statewide median income for households of any size (\$56,642). By the 2024 ACS the median income for a 1-person household rose to \$40,196, which is substantially below the median for all households that year (\$73,958). [ACS 2016-2020 data and 2024 data]

In North Carolina, single-person households (“individuals”) represent 72% of all people experiencing homelessness. Of those individuals, 22% are chronically homeless, and 61% of the chronically homeless individuals are unsheltered. [2024 PIT Count]

The count of people experiencing homelessness who were not in families increased 17% from the 2023 PIT to the 2024 PIT. (This is similar to the 19% growth in the total count of people experiencing homelessness from 2023 to 2024.) In 2024 there were nearly 8,400 people experiencing homelessness who were not in families. 2024 PIT data shows that 22% of the population experiencing homelessness in North Carolina is aged 55 or older; this is comparable to the percent in 2023. [2024 and 2023 PIT Counts] Nation-wide, nearly half of the 55+ experiencing homelessness are unsheltered. [2024 AHAR] Older adults that are the most vulnerable to becoming homeless include those that have lost housing after the death of a loved one, or when age-related illness or infirmity results in the loss of employment and income.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

Roughly 32.1% (2.7 million) North Carolinians have one or more disabilities. People 65 and older are more likely to have disabilities, with 50.2% of disabled North Carolinians in this age range. [Center for Disease Control 2022 data] People with disabilities are more likely to be low-income and are more likely to be cost-burdened. Additional barriers such as accessibility and discrimination further limit their housing options. In North Carolina, about 20,150 individuals are on the “Innovations Waiver waitlist” (according to the NCDHHS Innovations Waiver Dashboard, available at <https://www.ncdhhs.gov/about/departments/initiatives/inclusion-connects/innovations-waitlist->

dashboard, updated January 13, 2026); this is a Medicaid waiver that allows people to receive the services necessary for them to live in the community and avoid institutionalization.

Often the housing needs for individuals with disabilities directly relate to having low incomes. In North Carolina, 217,098 people were living on SSI in 2025, when the maximum monthly SSI amount for an individual was \$967. [Social Security Administration] Approximately 7,900 North Carolinians received SSDI (Social Security Disability Insurance) in 2025, with an average monthly payment of \$1,340. [DisabilityAdvice.org] According to Realtor.com, the national median rent for a 1-bedroom unit was \$1,582 in May 2025, more than the monthly SSI payment. In North Carolina in 2024 the median monthly rent was \$1,338. [2024 ACS]

Domestic violence is consistently identified as a significant factor in homelessness. More than 90% of women who are experiencing homelessness report having experienced severe physical or sexual violence at some point in their lives, and 25% of homeless children have witnessed violence. [The Safe Alliance, & American Bar Association] Domestic violence, homelessness, and housing insecurity are undeniably linked, as lack of safe and affordable housing is often reported as one of the primary barriers survivors of domestic violence face when they choose to leave an abusive partner.

In North Carolina a total of 740 survivors of domestic violence experiencing homelessness were counted during the January 2024 PIT count. The majority (593) of these survivors were in transitional housing or emergency shelters and 147 were unsheltered. [HUD, based on 2024 PIT Count] The NC Department of Administration reported that over the one-year period from July 2023 to June 2024, 55,400 clients received services for domestic violence in North Carolina, of which 8,569 were homeless or housing insecure. [NC Dept of Administration]

What are the most common housing problems?

Many low-income renters pay more than they can afford for housing. Paying more than 30% for housing (called “cost-burden”) affects 37.8% of all renters earning >50-80% AMI, 68.6% of very low-income renters (those earning >30-50% AMI), and 78.9% of extremely low-income renters (those earning 0-30% AMI). Severe cost-burden (paying more than half the household’s income for housing) affects 3.7% of renters earning >50-80% AMI, 25.1% of very low-income renters (those earning >30-50% AMI), and 57.0% of those earning 0-30% AMI. [2016-2020 CHAS]

While homeowners typically have higher incomes than renters, severe cost burden is also a problem for homeowners. 29.0% of homeowners earning >50-80% AMI, 45.4% of owners earning >30-50% AMI, and 76.4% of owners earning 0-30% AMI (extremely low-income homeowners) are cost-burdened. 7.0% of owners earning >50-80% AMI, 20.1% of owners earning >30-50% AMI, and 28.0% of owners earning 0-30% AMI are severely cost burdened. [2016-2020 CHAS]

Are any populations/household types more affected than others by these problems?

Lower-income households are at greater risk of cost burdening than higher-income households. Extremely low-income households (those earning 0-30% AMI) comprise 12% of the households, but 32% of the cost-burdened households. Very low-income households (those earning >30-50% AMI) comprise 10% of the households but 19% of the cost-burdened households. And low-income households earning >50-80% AMI comprise 17% of the households but 25% of the cost-burdened households.

Households of color experience cost burdening disproportionately, compared to white households. Households with that identify as a race other than white comprise 40% of households, but 50% of the cost-burdened households. [2023 PUMS]

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

The characteristics and needs of families and individuals at imminent risk of homelessness can be modelled by looking at families and individuals who have actually entered homelessness.

The shortage of affordable rental housing is a driving factor for families that become homeless. When people are paying too large a share of their income for rent even a minor crisis or setback, such as a reduction in work hours or an unexpected expense, can be de-stabilizing and result in the loss of housing. The United States Interagency Council on Homelessness cites worst-case housing needs, evictions, family violence, and adverse childhood experiences as risk factors of homelessness for families. [USICH 2018 report “Homelessness in America: Focus on Families with Children”]

For individuals experiencing homelessness, major contributors to becoming homeless are similar to those for families experiencing homelessness: (a) a shortage of rental housing affordable to people with extremely low incomes or who rely on SSI benefits, (b) high rates of adverse childhood experiences, (c) incarceration, and (d) behavioral health disorders. [USICH 2018 report “Homelessness in America: Focus on Individual Adults”]

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

Not applicable.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

Research regarding housing instability and related data suggest that the primary contributor to homelessness is a lack of affordable housing in the region. [Colburn and Aldern (2022)] For people who need extra supports to remain stably housed (for example, they struggle with mental health or have a history of substance abuse) the supports found through permanent supportive housing are very effective at increasing their housing stability. [Aubry et al (2020) Lancet Public Health. Effectiveness of permanent supportive housing and income assistance interventions for homeless individuals in high-income countries: a systematic review]

Research published in 2017 found that families with previous homeless episodes returned to shelter more frequently than other families, and those who had previously doubled up were more likely than other families to double up again. These findings add to previous research that suggests past housing instability predicts future instability. [Glendening, Z. and Shinn, M. (2017) Cityscape. Risk Models for Returns to Housing Instability Among Families Experiencing Homelessness]

In contrast to doubling-up and lack of income, which each increase the risk of homelessness, housing subsidies decrease housing instability. For most families, homelessness is a housing affordability problem; lack of resources to afford housing increases instability and increases risk of homelessness. Access to affordable housing and access to long-term housing subsidies decrease risk of homelessness and increase housing stability. The Family Options Study, a multi-site random assignment experiment designed to study the impact of various housing and services interventions for homeless families, found that housing subsidies reduced all forms of housing instability dramatically, and also had significant impact on many aspects of family stability (like intimate partner violence, separation from children, food insecurity, and school absences). [HUD Office of Policy Development 2015 “Family Options Study: Short-Term Impacts of Housing and Services Interventions for Homeless Families”]

Discussion

There is insufficient affordable housing in North Carolina. An increase is needed of both rental units and homeownership units that are affordable to households in the extremely low-income range, very low-income range, and low-income range.

CDBG-DR

Certain characteristics of the housing supply in western North Carolina create challenges for hurricane recovery and rehousing displaced individuals, such as:

Seasonal Housing: In the 39 declared counties, seasonal housing represents approximately 10% of the total housing stock, with a range of less than 1% in many of the Piedmont counties to nearly 45% in Avery County. Statewide, seasonal housing is only 3.9% of the housing stock.

Vacant Units: In the 39 declared counties, 7.3% of total housing units are designated as ‘vacant-other’ according to ACS data. Often, housing units designated as ‘vacant-other’ are indicated as such due to condition, foreclosure, or other legal reasons, or for personal/family reasons and cannot easily or quickly

be reincorporated into the occupied housing stock. Statewide, vacant-other units are only 4.6% of total housing units.

Affordable Housing: HUD defines housing cost burden at several levels: a moderate housing cost burden means that a household pays more than 30% of income for housing while a severely cost burdened household pays more than 50% of income for housing. According to the Housing Impact Assessment, 20% of all homeowners and 45% of all renters in North Carolina are cost burdened. Within the Combined MID areas, Buncombe County has the highest concentration of cost burdened households. Further, the OSBM report indicates that in disaster-declared counties, 40.8% of households earn less than 80% of the area median income (AMI), so affordable housing is a key issue for this population. As noted earlier, manufactured housing units (MHUs) (often referred to as mobile homes) represent a substantial proportion of the housing stock in the counties covered by the major disaster declaration for Helene (DR-4827-NC). The Housing Impact Assessment identifies the following counties within the Combined MID areas as having more than 20% of their housing primarily categorized as mobile homes but including several other alternatives: Alexander, Burke, Graham, McDowell, Madison, Surry, Swain, Wilkes, and Yadkin. This information provides important focus given NCDOC's intention to focus on providing MHU owners with traditionally built houses to provide more resilient housing in response to these disaster-impacted households.

In proposing to allocate \$1.052 billion or 74% of its CDBG-DR allocation for housing recovery, NCDOC will seek to assist as many low- and moderate-income households as possible with their housing needs while still reserving 20% of funds for infrastructure and economic development needs

NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

This section assesses the extent to which any racial or ethnic group has disproportionately greater housing needs in comparison to the income group as a whole. A disproportionately greater need is identified when the percentage of households with at least one of four housing problems from a particular racial or ethnic group is at least 10 percentage points higher than the percentage of households with at least one of four housing problem for the income group overall.

The four income groups considered are:

- 0-30% of area median income (AMI)
- >30-50% AMI
- >50-80% AMI
- >80-100% AMI

The four housing problems include:

- Lack of complete kitchen facilities
- Lack of complete plumbing facilities
- More than one person per room
- Cost burden exceeding 30% of monthly gross income

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	380,975	141,252	0
White	189,761	84,332	0
Black / African American	135,011	40,724	0
Asian	7,658	2,223	0
American Indian, Alaska Native	5,605	2,796	0
Pacific Islander	121	123	0
Hispanic	33,098	7,896	0

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data 2016-2020 CHAS
Source:

*The four housing problems are:

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

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	312,605	190,988	0
White	161,227	126,664	0
Black / African American	98,433	40,883	0
Asian	6,547	2,196	0
American Indian, Alaska Native	2,595	3,370	0
Pacific Islander	229	90	0
Hispanic	35,648	15,081	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data 2016-2020 CHAS
Source:

*The four housing problems are:

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

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	260,235	458,893	0
White	153,376	298,251	0
Black / African American	71,712	103,809	0
Asian	5,261	6,552	0
American Indian, Alaska Native	1,788	4,988	0
Pacific Islander	237	192	0
Hispanic	22,429	37,468	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data 2016-2020 CHAS
Source:

*The four housing problems are:

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

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	75,381	354,146	0
White	49,908	237,535	0
Black / African American	15,629	76,504	0
Asian	2,100	6,325	0
American Indian, Alaska Native	833	3,333	0
Pacific Islander	79	157	0
Hispanic	5,544	23,661	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data 2016-2020 CHAS
Source:

*The four housing problems are:

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

Discussion

Income and racial disparities in access to a safe, stable, and affordable homes have long existed in North Carolina’s housing market: households with low incomes and people of color are more likely to experience one or more housing problems. For example, 72.9% of extremely low-income households (earning ≤30% of area median income (AMI)) and 62.1% of very low-income households (earning >30-50% AMI) report having one or more housing problems, while 17.6% of higher income households (earning >80-100% AMI) experience one or more housing problems. In addition, while housing problems are experienced by all races and ethnicities in North Carolina, Black/African American, Asian, Pacific Islander, and Hispanic households earning below median income are especially likely to experience at least one housing problem: 55.1% of Black/African American households, 55.5% of Asian households, 54.2% of Pacific Islander households, and 53.5% of Hispanic households experience at least one housing problem, compared to 47.3% of all households earning below median income. These trends are consistent across all four income groups explored in this section.

For the purposes of this analysis, a need is disproportionate if it is 10 percentage points or more above the overall jurisdiction level (“jurisdiction as a whole”). Per this definition, Asian 30-50% AMI households, Pacific Islander 50-80% AMI households, and Pacific Islander 80-100% AMI households have disproportionately greater housing needs compared to their income group as a whole.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

This section assesses the extent to which any racial or ethnic group has disproportionately greater severe housing needs in comparison to the income group as a whole. A disproportionately greater need is identified when the percentage of households with at least one of four severe housing problems from a particular racial or ethnic group is at least 10 percentage points higher than the percentage of households with at least one of four severe housing problem for the income group overall.

The four income groups considered are:

- 0-30% of area median income (AMI)
- >30-50% AMI
- >50-80% AMI
- >80-100% AMI

The four severe housing problems examined are:

- Lack of complete kitchen facilities
- Lack of complete plumbing facilities
- More than 1.5 persons per room
- Cost burden exceeding 50% of monthly gross income

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	307,125	215,074	0
White	150,562	123,635	0
Black / African American	109,888	65,902	0
Asian	6,803	3,078	0
American Indian, Alaska Native	4,295	4,095	0
Pacific Islander	109	135	0
Hispanic	27,504	13,525	0

Table 17 – Severe Housing Problems 0 - 30% AMI

Data 2016-2020 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	139,234	364,446	0
White	73,539	214,469	0
Black / African American	40,431	98,885	0
Asian	3,067	5,663	0
American Indian, Alaska Native	1,032	4,935	0
Pacific Islander	140	185	0
Hispanic	16,655	33,991	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data 2016-2020 CHAS
Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	65,706	653,314	0
White	39,432	412,127	0
Black / African American	14,253	161,387	0
Asian	1,790	10,010	0
American Indian, Alaska Native	603	6,178	0
Pacific Islander	73	356	0
Hispanic	8,746	51,089	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data 2016-2020 CHAS
 Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	19,505	410,108	0
White	11,174	276,303	0
Black / African American	3,923	88,231	0
Asian	884	7,541	0
American Indian, Alaska Native	475	3,694	0
Pacific Islander	50	186	0
Hispanic	2,725	26,498	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data 2016-2020 CHAS
 Source:

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

Discussion

As with the housing needs identified in NA-15 previously, households with low incomes and people of color are more likely to experience one or more severe housing problems. For example, 58.8% of extremely low-income households (earning $\leq 30\%$ of area median income (AMI)) and 27.7% of very low-income households (earning $>30-50\%$ AMI) report having one or more severe housing problems, while 4.5% of higher income households (earning $>80-100\%$ AMI) experience one or more severe housing problems. In addition, while severe housing problems are experienced by all races and ethnicities in North Carolina, Black/African American, Asian, Pacific Islander, and Hispanic households earning below median income are especially likely to experience at least one severe housing problem: 28.9% of Black/African American households, 32.3% of Asian households, 30.1% of Pacific Islander households, and 30.8% of Hispanic households experience at least one severe housing problem, compared to 24.4% of all households earning below median income. These trends are consistent across all four income groups explored in this section.

For the purposes of this analysis, a need is disproportionate if it is 10 percentage points or more above the overall jurisdiction level (“jurisdiction as a whole”). Per this definition, Asian 0-30% AMI households, Pacific Islander 30-50% AMI households, and Pacific Islander 80-100% AMI households have disproportionately greater housing needs compared to their income group as a whole.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction:

This section assesses the extent to which any racial or ethnic group has experienced disproportionately greater housing cost burden compared to all households statewide. A disproportionately greater need is identified when the percentage of cost-burdened or severely cost-burdened households from a particular racial or ethnic group is at least 10 percentage points higher than the percentage of households overall. Cost burden is defined as paying more than 30% of household income on housing costs. Severe cost burden is defined as paying more than 50% of household income on housing costs.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	2,931,230	574,494	468,654	55,888
White	2,108,166	331,019	255,248	31,119
Black / African American	505,330	165,412	150,710	16,168
Asian	74,753	11,527	9,897	1,559
American Indian, Alaska Native	27,881	4,974	5,131	1,314
Pacific Islander	1,205	433	249	119
Hispanic	166,868	48,966	35,798	4,451

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2016-2020 CHAS

Discussion:

Households from all race and ethnic groups except Asian households and white households experienced cost burden and severe cost burden at higher rates than the state overall. For example, 38.0% of Black/African American households, 26.6% of American Indian and Alaska Native households, 36.1% of Pacific Islander households, and 33.7% of Hispanic households were cost-burdened compared to 26.2% of the state overall, 21.8% of white households, and 22.3% of Asian households. For the purposes of this analysis, a need is disproportionate if it is 10 percentage points or more above the overall jurisdiction level (“jurisdiction as a whole”). Per this definition, Black/African American households have disproportionately greater housing cost burden compared to the state as a whole (38.0% vs. 26.2%, respectively).

These trends are consistent for severe cost burden, as well: 18.3% of Black/African American households, 13.5% of American Indian and Alaska Native households, 13.2% of Pacific Islander households, and 14.2% of Hispanic households were severely cost-burdened compared to 11.8% of the state overall, 9.5% of White households, and 10.3% of Asian households. Per the definition of disproportionate need, no racial or ethnic groups experienced severe housing cost burden levels disproportionately when compared to the state as a whole. (2016-2020 CHAS, NCHFA calculations. Because of ambiguity in the underlying data, households with no/negative income are excluded from both the numerator and denominator of these calculations.)

NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

Households with lower incomes and people of color experienced one or more housing problems or severe housing problems at the highest rates in North Carolina. For example, across the entire state, 47.3% of households experienced at least one housing problem compared to:

- 72.9% of extremely low-income households ($\leq 30\%$ AMI)
- 62.1% of very low-income households (30-50% AMI)
- 36.2% of low-income households (50-80% AMI)
- 17.6% of median-income households (80-100% AMI)
- 42.6% of White households ($< 100\%$ AMI)
- 55.1% of Black/African American households ($< 100\%$ AMI)
- 55.5% of Asian households ($< 100\%$ AMI)
- 42.8% of American Indian, Alaska Native households ($< 100\%$ AMI)
- 54.2% of Pacific Islander households ($< 100\%$ AMI)
- 53.5% of Hispanic households ($< 100\%$ AMI)

For the purposes of this analysis, a need is disproportionate if it is 10 percentage points or more above the overall jurisdiction level (“jurisdiction as a whole”). Per this definition, extremely low-income households and very low-income households disproportionately experienced at least one housing problem compared to the state as a whole.

Within almost every income category, there is one race or ethnic group disproportionately experiencing at least one housing problem compared to the income category as a whole: Asian 30-50% AMI households (74.9% vs. 62.1% in the income category as a whole), Pacific Islander 50-80% AMI households (55.2% vs. 36.2% in the income category as a whole), and Pacific Islander 80-100% AMI households (33.5% vs. 17.5% in the income category as a whole).[1] These trends are broadly consistent for severe housing needs, as well.

Regarding cost burden specifically, Black/African American households have disproportionately greater housing cost burden compared to the state as a whole (38.0% vs. 26.2%, respectively).

[1] Please note that the Pacific Islander population in North Carolina is very small (approximately 2,500 households).

If they have needs not identified above, what are those needs?

In addition to the housing needs identified already—cost burden, lack of plumbing facilities, lack of kitchen facilities, and crowding—there are additional housing challenges that have been identified by communities across North Carolina:

- Substandard housing quality: deteriorated, inaccessible, or otherwise unsafe units
- Rural gaps: rural areas often contend with an aging housing stock, lack of local resources, stagnant wages, and aging or inadequate infrastructure
- Urban pressures: urban areas often struggle with high housing prices and displacement pressures
- Limited resources to enable seniors to age in place
- Elevated risk of homelessness among vulnerable populations

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

A large and growing body of research has found that the housing affordability, safety, and adequacy challenges described in this section are more likely in areas of concentrated poverty. Analysis of 2020 racially/ethnically areas of concentrated poverty (R/ECAP) in North Carolina identified 79 census tracts across the state with both concentrated poverty (at least 40% of individuals in the census tract are living at or below the poverty line) and racial and ethnic concentrations per HUD’s definition (meaning at least 50% of the population in the census tract is non-white). Fewer than 3% of all census tracts in North Carolina are R/ECAPs. Of these, nearly half (34 census tracts or 43.0% of R/ECAPs) are located in the urban counties, 25 (31.6%) are located in rural counties, and 20 (25.3%) are located in suburban counties.[1] The counties with the largest number of R/ECAPs are all in more urban areas: Mecklenburg County (Charlotte) has the highest number with 11 qualifying census tracts, followed by Forsyth County (Winston-Salem) with 10 R/ECAPs and Guilford County (Greensboro) with 6 R/ECAPs. [Source: HUD on R/ECAP]

Beyond the racial, ethnic, and poverty concentrations that define them, R/ECAPs in North Carolina often exhibit several additional characteristics, when compared to other areas, including:

- Higher vacancy rates
- Lower property values
- Lower owner-occupancy and higher renter-occupancy
- An older housing stock
- Higher percentage of households experiencing cost burden
- Fewer households with internet access
- Closer proximity to highways, landfills, and airports

[1] County urbanicity was determined with the NC Rural Center’s County Classifications at <https://www.ncruralcenter.org/how-we-define-rural/>.

NA-35 Public Housing – 91.205(b)

Introduction

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *

Table 22 - Public Housing by Program Type

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	
									# Homeless at admission
# of Elderly Program Participants (>62)	0	0	3,027	5,292	235	5,033	4	2	
# of Disabled Families	0	0	3,007	7,752	127	7,475	12	12	

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
# of Families requesting accessibility features	19	0	15,035	27,192	596	26,227	70	96
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	9	0	3,851	10,455	352	9,938	18	49	58
Black/African American	5	0	10,577	16,230	244	15,788	51	45	41
Asian	0	0	112	34	0	31	0	1	1
American Indian/Alaska Native	5	0	481	431	0	429	1	1	0
Pacific Islander	0	0	14	42	0	41	0	0	0

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Other	0	0	0	0	0	0	0	0	0

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 25 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	1	0	455	378	6	364	1	4	2
Not Hispanic	18	0	14,580	26,814	590	25,863	69	92	98

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 26 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

N/A

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

N/A

How do these needs compare to the housing needs of the population at large

N/A

Discussion

Within the Helene Combined MID areas, thirty PHAs have been identified as serving these impacted areas. This census is based on information available on HUD’s website which provides contact information for PHAs in the State. These PHAs have a mix of Annual Contribution Contract (ACC) units, Housing Choice Vouchers (HCVs), and Project-Based Vouchers. The Housing Impact Assessment indicates public housing damage assessments have been completed and reflect limited damage to public housing and to units where households use HCVs. On the public housing side, only 26 units were reported in the Assessment as having been damaged and while several others had yet to report their damage as of January 15, 2025. No data are available in the Assessment regarding damage to HCV units. Concurrently, displacements as a result of damage were also limited and the Assessment indicates a total of 209 displacements between HCV holders (190) and public housing residents (19). Approximately 25% of those households displaced were rehoused by mid-January and additional progress has likely been made in the interim. The Housing Impact Assessment also provides a useful picture of damage to the 465 properties in the HUD multifamily housing portfolio that are located in the 39 counties declared under DR-4827. These properties either have a Federal Housing Administration (FHA) mortgage insurance, Project-based Rental Assistance (PBRA), deed restriction covenants or a combination of these instruments. Of the 465 properties, 10.45% sustained damage.

The Assessment reported that 71 households in HUD Multifamily properties were displaced as of early March 2025 and had been provided temporary housing. On a related point, the Assessment indicated that only 19 units at 6 multifamily properties in the North Carolina Housing Finance Agency (NCHSA) portfolio were off-line as of January 21, 2025. Similarly, the Assessment included data on damages to the USDA Rural Development multifamily portfolio, indicating that 66 properties suffered some damage but only 4 sustained major damage. This impact resulted in 21 units in Buncombe and Yancey counties being uninhabitable.

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

The January 2024 Point-in-Time count showed several increases that reflect nationwide trends among the general homeless population as well as the subpopulations. The 2024 Annual Homelessness Assessment Report reports that homelessness in North Carolina has increased 37% since 2019, including an increase in households with children and households with only children. Between 2023 and 2024, the number of individuals experiencing homelessness increased by 17%. Increases in unsheltered individuals outpaced increases in sheltered individuals (25% vs. 10%).

Increasing trends demonstrate that thousands of North Carolinians are currently homeless and in need of assistance and were most notable among the unsheltered versus sheltered populations. There were 11,626 homeless individuals in North Carolina identified during the Point-in-Time (PIT) count conducted in late January 2024. Of these 7,103, or 61%, were staying in emergency shelters or transitional housing, and 3,954, or 39% were sleeping in unsheltered locations. 71% were adults with no dependent children, and 24% were people in families with children. Seven percent (7%) were veterans. 524 unaccompanied youth were also counted. While 6,037 NC residents were housed in 2024, 17,987 entered into homelessness.

Homelessness in North Carolina has been increasing in recent years. The 2024 Annual Homeless Assessment Report (2024 AHAR) reports that between 2023 and 2024 the number of individuals experiencing homelessness increased by 17%. Unsheltered individuals increased by 25%, and sheltered individuals increased by 10%. [2024 AHAR]

Thousands of North Carolinians are currently homeless and in need of assistance. There were 11,626 homeless individuals in North Carolina identified during the Point-in-Time (PIT) count conducted in late January 2024. Of these 7,103, or 61%, were staying in emergency shelters, transitional housing, or Safe Haven shelters, and 4,523, or 39% were sleeping in unsheltered locations. The count of unsheltered individuals, in particular, saw striking growth: there are approximately twice as many unsheltered individuals than there were in the PIT count 5 years prior. [2019 PIT and 2024 PIT]

The 2024 PIT count showed that of the population experiencing homelessness, 68% were adults with no dependent children, and 28% were people in families with children. 524 unaccompanied youth were also counted. [2024 PIT Count] Fifteen percent (15%) of the homeless population was reported as having a severe mental illness; 8% a substance abuse disorder; 6% were victims of domestic violence. [HUD publication "HUD 2024 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulation].

As of the time of this writing the statewide PIT figures are not available, but a Continuum of Care in Buncombe County, one of the areas heavily impacted by Hurricane Helene, has released their counts. In comparison to 2024's total of 739 people experiencing homelessness, the 2025

figures totaled more than 2,300. Of those 2,300, approximately 1,548 were temporarily sheltered on the night of the count due to FEMA’s Transitional Sheltering Assistance program. And of the 328 who were unsheltered, 116 reported on the day of the count (3 months after the storm) that their homelessness was a result of Helene.

CDBG-DR Homeless Needs Assessment

The following table uses data from HUD’s 2023 Point-in Time (PIT) count to demonstrate homelessness estimates for North Carolina as a whole, for the counties covered by the Helene disaster declaration (DR4827), and for the Combined MID areas as defined by HUD and NCDOC. Consistent with the description of similar data in the Housing Impact Assessment, it should be noted that NCDOC has included the North Carolina Balance of State Continuum of Care in the combined MID estimate as the data for disaster impacted counties cannot be disaggregated. NCDOC sees this approach as a partial offset to the fact that PIT count is widely recognized as a significant undercount of homeless individuals.

Estimate Type	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
Statewide Area Estimate	5,034	1,259	3,443	9,754
FEMA Disaster Declaration Area Estimate	3,784	951	2,337	6,853
Combined MID Area Estimate	2,225	582	1,730	4,451

Table 1 - CDBG-DR Table: Point-in-Time (PIT) Count - Type of Shelter

For persons in rural areas who are homeless or at risk of homelessness, describe the nature and extent of unsheltered and sheltered homelessness with the jurisdiction:

The January 2024 Point in Time Count reports that 4,180 individuals were experiencing homelessness, which represents 36% of the homeless population. Roughly half of the total count of unsheltered homeless in North Carolina can be found in the largely rural CoCs. The majority of North Carolina’s unsheltered homeless families can also be found in the largely rural CoCs. This aligns with a report by the National Alliance to End Homelessness, which states that many rural homeless people reside in “hidden places”, such as campgrounds, cars, abandoned farm

buildings or other places not intended for habitation. Out of the total homeless in rural areas, 68% were sheltered and 32% were unsheltered.

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Persons in households with only adults comprised 72% of the homeless population, with 38% located in either shelter or transitional housing, and 34% were unsheltered. Persons in households with adults and children comprised 28% of the homeless population, with 22% of those families in either shelter or transitional housing and 5% unsheltered. Of the 524 recorded unaccompanied youth, more than a third were unsheltered. [HUD publication "HUD 2024 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations"]

The 2024 PIT records 2,085 chronically homeless persons, of which 53% are unsheltered. Eighteen percent (18%) of those experiencing homelessness are chronically homeless. Chronically homeless persons are less likely to be sheltered than the whole homeless population; only 47% are sheltered, compared to 61% of the total homeless population. Thirteen percent (13%) of chronically homeless people are in families. [2024 PIT Count]

Veterans, on the other hand, are more likely to be sheltered than the total homeless population; 77% of homeless veterans are sheltered (compared to 61% of the overall homeless population), and the remaining 23% of the 688 veterans experiencing homelessness are unsheltered. [HUD publication "HUD 2024 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations"] The number of homeless veterans decreased 41% from the 2014 PIT to the 2024 PIT.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	1,927	2,482
Black or African American	3,265	1,688
Asian	24	11
American Indian or Alaska Native	69	80
Pacific Islander	9	15
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	388	230
Not Hispanic	5,291	4,239

Data Source
Comments:

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

The number of homeless veterans has dropped by 30% from 2019, with 688 homeless veterans counted during the 2024 PIT. There was a total of 3,230 homeless adults with children during the 2024 PIT count; this represents a 30% increase from 2019.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

There are nearly over 5,700 Black people, nearly 5,000 white people, and nearly 1,000 people of other race categories experiencing homelessness in North Carolina. There are more than 600 Hispanic homeless people in the state.

Different racial/ethnic categories experience homelessness at different ratios. African Americans comprise approximately 21% of the state’s population, but 43% of the homeless population. 63% of the state’s population is in the category “White alone, not Hispanic or Latino”, while white people comprise only 38% of the state’s homeless population. Hispanic people make up 10% of the total population in North Carolina, but only 5% of the homeless population. Those identifying as Asian, Native Hawaiian/Pacific Islander, American Indian/Alaskan Native, and multi-racial together comprise 2% of the state’s homeless population.

Black people experiencing homelessness are more likely to be in shelters than white people experiencing homelessness with 66% of Black people experiencing homelessness are sheltered and only 44% of white people experiencing homeless are sheltered. The remainder are unsheltered or living in structures not intended for housing

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

Substantially more of the homeless population are sheltered than unsheltered. There were 11,626 homeless individuals in North Carolina identified during the Point-in-Time (PIT) Count conducted in late January 2024, of which 61% were sheltered and 39% unsheltered. This is a 15% decrease in sheltered homelessness from 2019.

People in households with only adults comprised 71% of the homeless population, with 53% located in either shelter or transitional housing, and 47% were unsheltered. People in households with adults and children comprised 28% of the homeless population, with 81% of those families were in either shelters or transitional housing and 19% were unsheltered.

People experiencing chronic homelessness are less likely to be sheltered; only 46% are sheltered, compared to 61% of the total homeless population. Veterans, on the other hand, are more likely to be sheltered than the total homeless population; 77% of homeless veterans are sheltered.

Discussion:

NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

This section focuses on non-homeless needs, especially those with disabilities and HIV/AIDS. As part of the State's continued effort to evolve and modernize the North Carolina Housing Opportunities for Persons with AIDS (HOPWA) program, NC has fully integrated the HOPWA program with the Ryan White Part B program funded by the Health Resources Services Administration (HRSA) and the HIV Prevention program funded by the Centers for Disease Control and Prevention (CDC). These programs, in collaboration, form the HIV/STD Prevention and Care Unit within the North Carolina Communicable Disease Branch. HOPWA program staff submitted, for review and comment, the draft Consolidated Plan to all Ryan White Part B HIV and HOPWA service providers that are funded by the North Carolina Division of Public Health HIV Care Program statewide. Hurricane Helene had a devastating impact on housing across western North Carolina, leaving thousands of families displaced and communities struggling to rebuild. Historic flooding, mudslides, and strong winds destroyed or severely damaged homes in areas such as Asheville, Swannanoa, Chimney Rock, and surrounding mountain towns. Many residents were left without flood insurance, creating major financial hardships and slowing recovery efforts. The storm also exposed the shortage of affordable housing in the region, as temporary shelters, FEMA housing, and rental assistance programs became overwhelmed. Even months after the storm, many families continued living in temporary housing, trailers, hotels, or damaged homes while waiting for repairs and rebuilding assistance.

The chart below requesting HIV Housing Need could not be populated in the provided template. The estimated unmet HIV housing need based on the type of HOPWA Assistance, however, is 88 for Tenant-Based Rental Assistance, 22 for Short-term Rent, Mortgage, and Utility, and 2 for Facility Based Housing (Permanent, short-term or transitional).

HOPWA

Current HOPWA formula use:	
Cumulative cases of AIDS reported	16,707
Area incidence of AIDS	699
Rate per population	8
Number of new cases prior year (3 years of data)	1,388
Rate per population (3 years of data)	15
Current HIV surveillance data:	
Number of Persons living with HIV (PLWH)	38,614
Area Prevalence (PLWH per population)	356
Number of new HIV cases reported last year	1,391

Table 29 – HOPWA Data

Data Source Comments: NC Surveillance Data effective July 1, 2025

HIV Housing Need (HOPWA Grantees Only)

Type of HOPWA Assistance	Estimates of Unmet Need
Tenant based rental assistance	0
Short-term Rent, Mortgage, and Utility	0
Facility Based Housing (Permanent, short-term or transitional)	0

Table 30 – HIV Housing Need

Data HOPWA CAPER and HOPWA Beneficiary Verification Worksheet
Source:

Describe the characteristics of special needs populations in your community:

The importance of housing status for HIV prevention and care is essential. Nine out of ten households receiving HOPWA housing assistance have extremely low or very low incomes. Nationwide 9 persons entering the HOPWA program were chronically homeless prior to entry and 0 persons HOPWA housing recipients were veterans. Research consistently shows that housing is a critical component of HIV care and prevention systems. By assisting with housing and related services, the HOPWA program helps PLWHA enter housing, access, and remain in care, and adhere to complex treatment regimens, which results in reduced use of emergency care and hospital services. Individuals living with and affected by HIV/AIDS have a higher incidence of homelessness which has a negative impact on their compliance with medical care. Lack of stable, secure, adequate housing is a significant barrier to consistent and appropriate HIV medical care, access, and adherence to antiretroviral medications, sustained viral suppression, and risk of transmission. The NC HOPWA and Ryan White Part B programs are fully integrated to ensure an integrated approach to housing, health, and support services to ensure individuals and their families are safely housed which results in improved health care outcomes. HOPWA Project Sponsors and Ryan White Part B funded providers share in the development of the Network Service Delivery Plan, Network Client Satisfaction Survey, Network Quality Management Plan, Network Evaluation Plan and Network Client Grievance Policy and Procedures. Their shared commitment to a blended plan for assessing client needs, satisfaction, and service delivery demonstrate the importance of these programs to work jointly under the umbrella of the HIV Care Program.

The HIV Care Program maintains a HOPWA Cascade which is a HIV Care Continuum Model for housing and care that analyzes HIV viral suppression in HIV+ individuals receiving HOPWA housing assistance. Data collected through the Cascade demonstrates that stable housing results in retention in care which thus results in better health outcomes and HIV Viral Suppression.

What are the housing and supportive service needs of these populations and how are these needs determined?

HIV responses have evolved from emergency initiatives focused primarily on treatment access to longer-term strategies for chronic disease management, increasing attention is paid to supportive service needs

that may affect treatment effectiveness. PLWHA are significantly more vulnerable to becoming homeless during their lifetime, with the greatest need for TBRA, STRMU, and PHP services which ensures access to permanent affordable housing. The housing and supportive services needs were determined based upon HOPWA Project Sponsors improved tracking of unmet need for HOPWA–Eligible households, Regional Networks of Care Needs Assessments, Regional Networks of Care Service Delivery Plans, and Regional Networks of Care Client Satisfaction Surveys.

In NC, the racial and ethnic composition of HOPWA housing recipients is reflective of the disparate impact of HIV on minorities: over 72% of persons receiving HOPWA housing identify as Black or African American or other racial/multiracial minorities 3% of households identify as having Hispanic/Latino ethnicity; over 32% of beneficiaries are female; and almost one-fifth are under 18 years of age. Our HOPWA Project Sponsors proposed to serve 249 eligible households with TBRA, and they served 232 eligible households. The number served was lower than proposed because due to a lack of available affordable housing options in the state, we continue to have TBRA waiting lists among our Project Sponsors. In addition, the rental and criminal background histories of some TBRA eligible clients are a barrier to obtaining housing.

Our HOPWA Project Sponsors proposed to serve 340 eligible households with STRMU assistance, and they served 238 eligible households. Although this number has significantly decreased from last year, the number served was still lower than proposed because Project Sponsors were successful in leveraging other resources to meet the short-term needs of eligible households.

Our HOPWA Project Sponsors proposed to serve 106 eligible households with PHP assistance, and they served 104 eligible households which is an increase. but as we continue to provide education to our Project Sponsors about allowable uses of permanent housing placement funds, we are seeing an increase, where appropriate, in the utilization of permanent housing services to assist eligible households.

Our HOPWA Project Sponsors proposed to serve 333 eligible households through SS, and they served 187 eligible households. This has significantly decreased, but clients have continued to utilize the other services to meet their needs.

Our HOPWA Project Sponsors proposed to serve 63 eligible households through Hotel/Motel, and they served 19 eligible households. This service has been added to assist clients that are in transition of housing needs.

Of the clients receiving HOPWA housing subsidy in 2025, 88.76% were stably housed and/or at reduced risk of homelessness. We attribute this to the fact that all our HOPWA Project Sponsors provide TBRA and STRMU services, as needed.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

The HOPWA formula grant was first funded for the State of NC in 1992 and served the entire state until 1998. In that year, the Charlotte, and Raleigh MSAs became eligible for HOPWA formula allocations and the state's service area was reduced. In 2002, Wake County received a transfer of HOPWA Formula funds from the Raleigh to provide HOPWA services to Wake, Franklin and Johnston counties. In 2011, Greensboro also became eligible for HOPWA formula funding to serve Guilford, Randolph and Rockingham counties and the state funding and service area was again reduced. The Charlotte MSA was revised in 2013 to include Iredell, Lincoln, and Rowan counties. The NC HOPWA program gained Anson County because of the 2013 revision to the Charlotte MSA service area. During the Federal Fiscal Year 2015, the Durham-Chapel Hill MSA became eligible for HOPWA formula funding which resulted in the transition of Chatham, Durham, Orange, and Person counties from the state HOPWA formula funding. As a result, the state's funding and service area was further reduced. In addition, clients living in Currituck and Camden County are served by the Virginia Beach, Virginia MSA, as well as Granville County are served by the Durham-Chapel Hill MSA. The NC HOPWA program was notified by HUD on October 9, 2020 that the Winston-Salem MSA became eligible for HOPWA Formula allocation and the State funding and service area will be further reduced in 2022. The City of Winston-Salem is in the process of developing an RFA for HOPWA funding with a planned start date of January 1, 2022. As a result, the NC HOPWA program will continue to provide HOPWA services for all counties within the Winston-Salem MSA through December 31, 2021. Effective January 1, 2022, the City of Winston-Salem MSA will provide HOPWA services for Davie, Davidson, Forsyth, Stokes, and Yadkin counties while the NC HOPWA program will continue to provide services for Surry County. In 2021, City of Fayetteville MSA was created and consisted of Cumberland, Harnett, and Holt County. Effective 2026, City of Fayetteville loss their MSA due them becoming ineligible for a HOPWA formula award, which resulted in the clients being transitioned back to the State program. As of January 2016, the state's HOPWA program now covers 74 of the 100 counties in NC. Funding from HUD supports the NC HOPWA Program ensuring the delivery of a comprehensive continuum of housing support services for persons living with HIV throughout 10 Regional Networks of Care and Prevention across the state. In addition to HOPWA services for individuals living with HIV/AIDS, each of the 10 Networks of Care and Prevention also provides core medical and support services for individuals living within each Network region.

If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))

N/A

Discussion:

NA-50 Non-Housing Community Development Needs – 91.215 (f)

Describe the jurisdiction’s need for Public Facilities:

Public facilities include all improvements and facilities that are either publicly owned or that are traditionally provided by the government, or owned by a nonprofit, and operated so as to be open to the general public. This would include neighborhood facilities, firehouses, public schools, libraries, and non-permanent housing such as shelters and transitional facilities for the homeless and other special needs populations. Public improvements include streets, sidewalks, curbs and gutters, parks, playgrounds, water and sewer lines, flood and drainage improvements, parking lots, utility lines, and aesthetic amenities on public property such as trees, sculptures, pools of water and fountains, and other works of art. These activities are primarily funded through the CDBG Neighborhood Revitalization Program, Economic Development, and Infrastructure programs. Units of local governments identify their needs and provide the documentation in the CDBG application submitted to the State. The Rural Economic Development Division consistently receives requests for funds to build and rehabilitate public facilities for the aging, homeless and low-and-moderate income communities. REDD will also assist businesses with building reuse, infrastructure, tenant improvement and other CDBG eligible activities. In return, the businesses will create and retain jobs, primarily for LMI persons. Recent destruction from Hurricane Helene in the western part of the State as allowed for the repair and replacement of numerous public facilities which include parks, walking trails, and community centers.

How were these needs determined?

One of the way needs have been determined is through an online survey as well as social media and contact with local stakeholders, consultants, and other interested parties.

Additionally, the housing needs assessment revealed that North Carolina's population is growing mostly in urban areas and in elderly population. Also, the homeless population and over-crowded housing is significant creating the need for emergency, transitional, and supporting housing.

Describe the jurisdiction’s need for Public Improvements:

CDBG

The public improvement needs throughout the state include broadband and water and sewer to address failing systems. Recent natural disasters have also highlighted the need for public improvements to respond to and prevent the disease. Some of the need is documented in the following reports:

<https://www.ncbroadband.gov/data-reports/homework-gap-north-carolina-report>

<https://www.ncbroadband.gov/data-reports/connecting-north-carolina-state-broadband-plan>

<https://www.ncbroadband.gov/data-reports/nc-broadband-indices>

<https://infrastructurereportcard.org/state-item/north-carolina/>

<https://governor.nc.gov/issues/infrastructure>

Broadband Access: High-speed Internet access is critical infrastructure for North Carolina communities, especially in rural and low-wealth areas. Without broadband, the residents, businesses, and institutions providing health care, education, and emergency response are technologically and socially isolated. More important, broadband access is critical to providing access to health care and education. The Broadband Infrastructure Office (BIO), in the NC Department of Information Technology (NCDIT), was established by North Carolina's Chief Information Officer in 2015 to serve as a statewide resource for broadband access, overseeing the State Broadband Plan for North Carolina. The office strives to narrow the digital divide in NC while continuously assessing the needs in the State

CDBG-DR:

The CDBG-DR Action Plan identified the need for public improvements including

- Electrical, Gas, Water, Sewer, Waste, and Telecom Infrastructure, and
- Roads and Bridges

How were these needs determined?

The needs determination is outlined in the reports noted above. Additionally, the need is documented through the demand during the funding application process and citizen participation surveys.

CDBG-DR Electrical, Gas, Water, Sewer, Waste, and Telecom Infrastructure:

The electrical, gas, water, sewer, waste, and telecom infrastructure of western North Carolina (WNC) services about three million residents and 500,000 businesses. The geography of this area creates unique challenges for pipes, wires, transmission and pumping stations, and related equipment as it must span terrains that are uniquely susceptible to natural disaster and especially difficult to repair or rebuild.

The total damage and need impact is estimated to be nearly \$7 billion. This is based on reports of damage from the NC Department of Environmental Quality, NC Department of Natural and Cultural Resources, municipal-owned electrical membership organizations, electrical cooperatives, private electricity and gas providers, and the Federal Communications Commission.

The direct damage and needs estimate is comprised of:

- \$1 billion in damage to the electrical wiring and electrical infrastructure facilities of 25 municipal-owned systems, seven cooperative-owned electrical systems, and Duke Energy Carolinas and Duke Energy Progress in a region serving nearly two million households
- \$100 million in damage to local parks, and erosion to riparian buffers and trail networks
- \$41 million in damage to gas lines impacting 400 customers and 10 retail propane locations that were severely damaged or destroyed resulting in the loss of 5,000 propane tanks
- \$205 million in damage to 29 public and private high hazard dams and 13 mining sites
- \$3.7 billion in damage to 163 water and sewer systems and hundreds of miles of impacted distribution pipes across more than 24 impacted towns
- \$128 million in damage at up to 400 facilities maintaining hazardous waste and 50 million cubic yards of debris, including 10 million cubic yards of curbside vegetative and construction/demolition waste needing to be recycled or disposed of
- \$100 million in damage to telecommunications and internet infrastructure, including submerged substations, thousands of downed utility poles, and downed transmission towers, covering a region with over 70 independent telecommunications and internet providers
- \$1.7 billion in funding to make infrastructure and technology upgrades to secure a more resilient WNC.

The financial toll of the disaster is nearly \$7 billion in damage and needs. OSBM estimates that the federal government and private sector will cover \$6 billion of this total, leaving \$730 million still unfunded, even after considering the State's investments to date.

OSBM projects that private businesses will bear more than \$1.2 billion in damage costs. Duke Energy, for instance, will shoulder the burden of restoring its infrastructure and will finance the repair costs by issuing storm bonds to cover over \$900 million in expenses. These funds will go towards replacing nearly 2,000 transformers, more than 12,000 power poles, and other critical infrastructure devastated by the storm. In WNC, gas providers will rely on a combination of insurance and their internal pipeline integrity mechanisms to manage their \$41 million in costs.

Private stormwater system owners are expected to handle \$100 million in damage through private insurance claims wherever possible. Uninsured private stormwater system owners, including HOAs, will either absorb the repair costs or pass them along to their customers in the form of higher fees. Similarly, telecommunications providers facing damage will likely absorb an estimated \$100 million in repair costs upfront, then shift those expenses to consumers through rate hikes.

CDBG-DR Roads and Bridges

Hurricane Helene has severely impacted approximately 5,000 miles of State-maintained roads across the affected area in western North Carolina, including several major national interstates and arterial routes that serve as critical transportation corridors. The North Carolina Department of Transportation (NCDOT) has found damage to 674 bridges and 712 culverts. Western North Carolina has 25% more public bridges than the State average, with the percentage of private bridges likely even higher due to the terrain and population density.

The terrain in this region is especially challenging, as it is mountainous with an elevation on average two to three times that of the Piedmont, which complicates road and bridge repairs. Western North Carolina also includes a significant number of privately maintained roads, with municipal and private roads making up 48% of all roads in the region compared to 41% for the State as a whole. This higher proportion of non-State infrastructure adds further complexity to recovery efforts. The following outlines the methodology used to estimate transportation needs resulting from Hurricane Helene. Estimates are based on data provided by government agencies, damage models, historical data, and trends. The total transportation impact is estimated at \$10.3 billion, the vast majority of which is anticipated to be covered by federal funding sources.

Of this total need, the NCDOT highway and bridge system is projected to require \$6 billion in repairs and replacements. Once major repair and replacement projects are underway, NCDOT will require substantial cash flow support while awaiting federal reimbursements. The Department's existing cash reserves are already committed to routine operations and ongoing programs, making additional financial resources essential to ensure long-term sustainability and the continued functionality of vital infrastructure.

CDBG-DR Private Roads and Bridges

OSBM's Disaster Recovery section has extrapolated data from previous storms, such as Tropical Storm Fred, to estimate the impact on private infrastructure in counties affected by Hurricane Helene. OSBM used this to estimate the potential number of affected private roads and bridges across counties hit by Hurricane Helene and scaled up the impact based on North Carolina Emergency Management (NCEM) advice on the severity of the damage relative to previous events. Private roads make up almost half of all roads in the region – more than 7,000 private roads, bridges, and culverts have been damaged.

While FEMA has already approved funding for over 3,000 minor repairs, significant support will be needed for larger repair and replacement projects. The unique nature of the mountainous terrain in western North Carolina presents additional challenges requiring specialized approaches to road and bridge repair.

Key issues of concern for repair of Helene-related infrastructure damage include:

- **Construction costs:** The assessment for infrastructure damage conservatively assumes construction costs will be 15% higher than estimated due to a shortage of available construction services and/or an increase in the cost of raw material and labor driven by multiple concurrent disasters across the Southeast. Experience from Hurricanes Matthew, Katrina, Harvey, and Florence, and Superstorm Sandy suggests similar shortages drove construction costs 8-20% higher in the aftermath of the event.¹⁸ In addition, Hurricane Helene construction costs are likely to be driven up by the continued impact of the pandemic recovery and more difficult terrain.
- **Damage Magnitude:** Proportional damage numbers, e.g., percent of roads damaged or destroyed, from county severity classification and inspection of locations with higher flooding, landslides, and road incidents.

- **Hazard Mitigation Costs:** The damage to road and bridge infrastructure across the Helene-impacted area is substantial, and hazard mitigation measures will be necessary to reduce future risks and long-term costs. OSBM estimates that \$1.7 billion will be needed for infrastructure and technology upgrades across Western North Carolina, including improvements to strengthen transportation, utilities, and other critical systems. Of this total, \$1.28 billion is expected to be allocated for hazard mitigation efforts specifically related to roads and bridges. This estimate was calculated by applying OSBM-reported mitigation cost factors, which range from 10% to 30% of total repair and replacement costs, to the \$6 billion in state-maintained road and bridge damage, \$1.38 billion in municipal road network damage, and \$460 million in private road and bridge damage. Using midpoint values within these ranges, a conservative estimate of \$1.28 billion was determined.

Describe the jurisdiction’s need for Public Services:

Public services needs have been increasing, especially following Hurricane Helene. The State of NC received a waiver from HUD that increased the cap in public service funding from 15% to 100% of documented need. This is only for one program year, and the area affected must be a county that was declared by FEMA as a disaster area. During the recovery from Hurricane Helene evidence of food deserts and insecurity was evident and has increased over time. Also, the job loss and the importance of housing stability have increased the demand for internet access and emergency payments for rent, mortgage, and utilities

How were these needs determined?

See the previous response and the resources below.

Food Deserts and Insecurity: <https://www.ers.usda.gov/data-products/food-access-research-atlas/go-to-the-atlas.aspx#.UuGErvYo6X1> <https://localfood.ces.ncsu.edu/food-access-food-security/>

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

While North Carolina continues to create new housing, it is not keeping up with the population. With both the total population increasing by about 6.4% and the number of households increasing by about 11.5% between 2020 and 2024 (based on US Census Bureau ACS One-year Estimates, DP05 & DP02), North Carolina's housing supply is not meeting its demand. The 2024 Bowen National Research report "Housing Supply Gap Analysis – State of North Carolina," found a gap of about 764,000 units, with a shortcoming of both rental and homeownership units. This gap is felt most strongly among lower income groups including low- and moderate-income households. Overall, housing supply has not kept pace with household growth, driving up home sales prices and rental costs. While housing costs may be lower in rural communities, incomes are often lower as well, making it difficult to buy, rent or maintain homes.

MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

Single-family homes make up most of the housing stock across the state. The vast majority of the housing units that are in developments with 20+ units are in urban areas. The six urban counties have more than double the number of units in these large developments as the other 94 counties combined. Twelve percent of the stock in urban areas are in such developments, compared to 4% in suburban areas and 2% in rural areas. The majority of the state’s mobile homes are in rural areas; among the state’s 74 rural counties, mobile homes comprise almost 20% of the housing stock (compared to 2% in urban counties and 11% in suburban counties). [2016-2020 ACS] Building permit data show that most new construction is of single-family homes; single-family homes comprised 74.0% of permits in 2024. There were 33.5% more building permits in 2024 than 2019, including 35.6% more 1-unit building permits, 26.2% more units in multifamily developments of 5 or more units, and 98.5% more duplexes. [U.S. Census Bureau 2019 & 2024 Building Permit Data]

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	3,061,131	65%
1-unit, attached structure	199,865	4%
2-4 units	219,915	5%
5-19 units	394,890	8%
20 or more units	227,259	5%
Mobile Home, boat, RV, van, etc	584,062	12%
Total	4,687,122	100%

Table 31 – Residential Properties by Unit Number

Data Source: 2016-2020 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	7,191	0%	50,275	4%
1 bedroom	28,415	1%	230,718	17%
2 bedrooms	374,045	14%	563,968	41%
3 or more bedrooms	2,240,198	85%	536,782	39%
Total	2,649,849	100%	1,381,743	101%

Table 32 – Unit Size by Tenure

Data Source: 2016-2020 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

Federally subsidized housing plays a key role in meeting the housing needs of seniors, people with disabilities, veterans, and low-income individuals in North Carolina. December 2025 data from the National Housing Preservation Database show there are 148,960 units in North Carolina with federal subsidies, including LIHTC, HOME, HTF, Section 8, Public Housing, USDA, and other HUD sources. LIHTC units constitute 57.0% of the federally subsidized rental housing stock, while Section 8 and Public Housing make up 31.7%.

A 2025 analysis by the Center for Budget and Policy Priorities shows that 271,100 residents in North Carolina rely on federal rent assistance to afford modest housing. Of those residents, 70% are seniors, children, or people with disabilities.

Each of the Consolidated Planning partners is involved in the provision of affordable housing. The North Carolina Housing Finance Agency sells bonds, allocates tax credits, and uses state and federal funds to finance affordable housing. Specifically, NCHFA administers and manages federal programs like the Low Income Housing Tax Credit (LIHTC), HOME Investment Partnerships Program (HOME), and national Housing Trust Fund (HTF) in addition to allocating state funding like the North Carolina Housing Trust Fund. The North Carolina Department of Commerce administers the federal Community Development Block Grant (CDBG) program, including the CDBG Disaster Recovery funds (CDBG-DR) as well as the Recovery Housing Program. The North Carolina Department of Health and Human Services (NC DHHS) Administers the Emergency Solutions Grant Program (ESG) and the Housing Opportunities for Persons with AIDS Program (HOPWA).

CDBG: Funds local community development activities with the goal of providing affordable housing, decreasing poverty and improving infrastructure.

ESG: Improves emergency shelters, provides essential services to shelter residents, re-houses homeless individuals and families, and prevents families and individuals from becoming homeless.

HOME: Funds rehabilitation, development, and preservation of rental and owner housing. Homeowner rehabilitation is offered for low- and moderate-income homeowners who are elderly, disabled, veterans, or who have a child under six regularly in the home. Rental housing development and rehabilitation targets renter households with incomes at or below 80% of AMI including elderly renters and those with special needs. Home buying programs target low- and moderate-income homebuyers, including those participating in sweat equity-based housing programs.

HTF: Funds development and rehabilitation of rental housing for households who are extremely low-income, including those who are elderly, disabled, veterans, or who have other special needs.

HOPWA: Provides housing and housing-related services to persons/families living with HIV infection in the 86 North Carolina counties covered by the state HOPWA program.

Low Income Housing Tax Credit: Finances development and substantial rehabilitation of affordable rental housing. It targets renters with incomes up to 80% of area median income (AMI) including elderly renters and those with special needs. LIHTC developments often make use of HOME or HTF funds to assist in financing the construction or rehabilitation.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

Most of North Carolina's subsidized affordable housing is financed through the federal Low-Income Housing Tax Credit (LIHTC) program, which incentivizes private investment in affordable rental housing by offering tax credits to developers in exchange for 30 years of affordability. This program has been the primary driver of affordable housing production in the state for decades. Although annual new construction has offset losses, the net increase in affordable properties financed with LIHTCs from year to year has been smaller due to those with expiring requirements. Since the program's inception, North Carolina has seen approximately 11.1% of apartments (or 12,500 units in 1,074 properties) leave the program due to expiring affordability requirements or early exits from the program due to foreclosures and qualified contracts, a regulated early sale option that is effectively no longer available in North Carolina. Having federal subsidies in addition to LIHTCs has helped extend the affordability restrictions of approximately 4,000 apartments with expired LIHTC affordability requirements. Most of these apartments (3,400) are in properties in rural communities with USDA 515 financing mandating longer rent restriction terms, with the remaining properties receiving locally-administered HOME funding, USDA 538 funding or are public housing.

Within the next decade, an additional 16,000 affordable apartments across 301 properties (16.0% of the active LIHTC portfolio) could see their LIHTC affordability restrictions expire if no additional preservation efforts are made. [This figure excludes LIHTC properties with additional federal subsidies with affordability restrictions that end after 2034]. Nearly half of these apartments are in metro counties (49.3%) with the highest concentrations in Wake (17.0%), Mecklenburg (9.7%) and Durham (7.8%) counties. By contrast, 22.3% of apartments are in eastern counties, 18.9% in central counties and 9.5% in western counties. [North Carolina Housing Finance Agency, The Role of the Low-Income Housing Tax Credit in Preserving Affordability 2025]

While the majority of federally assisted homes with expiring affordability restrictions in the coming years are financed with Low-Income Housing Tax Credits, properties financed with Section 8 project-based rental contracts, USDA rural development loans, and other HUD-provided financing (e.g., HOME, HTF, Section 202 Direct Loans, etc.) are also at risk. According to the National Housing Trust, 16% of federally assisted homes with expiring affordability restrictions in the next five years are assisted by HUD programs, 7% are assisted with USDA financing, 6% are assisted with Section 8 project-based rental

assistance contracts, and 4% are assisted with multiple federal programs (the remaining 68% are assisted with LIHTCs).

Beyond the subsidized affordable housing stock, North Carolina is also facing a growing shortage of low-rent unsubsidized units. The majority of the state's affordable housing stock is unsubsidized, making it vulnerable to changes in the housing market. Between 2012 and 2022 North Carolina lost 31% of its low-cost units (a loss of 139,000 units) with rents under \$600 and 35% of units with rents between \$600 and \$799 (a loss of 124,000 units) when adjusted for inflation. Several forces have contributed to the shrinking supply of low-cost rentals – including increased demand from high-income renters and an aging stock with costly repair needs. [Harvard Joint Center for Housing Studies, America's Rental Housing 2024]

Does the availability of housing units meet the needs of the population?

The housing needs of extremely low-income households are not being met by the current housing stock in North Carolina. There is a shortage of 196,200 homes for renters at 30% AMI and below and a shortage of 210,700 for renters at 50% AMI and below. As a consequence, low- and extremely low-income households are experiencing severe cost burden with 73% of extremely low-income renters spending half or more of their income on housing. [National Low Income Housing Coalition 2025 "The Gap" report] Other researchers forecasted a gap of 764,000 total units (322,000 rental units and 442,000 units for purchase) in North Carolina by 2029. [Bowen National Research report "2024 Housing Supply Gap Analysis, State of North Carolina"]

Describe the need for specific types of housing:

Federally subsidized housing plays a key role in meeting the housing needs of seniors, people with disabilities, veterans, and low-income individuals in North Carolina. December 2025 data from the National Housing Preservation Database show there are 148,960 units in North Carolina with federal subsidies, including LIHTC, HOME, HTF, Section 8, Public Housing, USDA, and other HUD sources. LIHTC units constitute 57.0% of the federally subsidized rental housing stock, while Section 8 and Public Housing make up 31.7%.

A 2025 analysis by the Center for Budget and Policy Priorities shows that 271,100 residents in North Carolina rely on federal rent assistance to afford modest housing. Of those residents, 70% are seniors, children, or people with disabilities.

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Administers the Emergency Solutions Grant Program (ESG) and the Housing Opportunities for Persons with AIDS Program (HOPWA).

CDBG: Funds local community development activities with the goal of providing affordable housing, decreasing poverty and improving infrastructure.

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Discussion

The current trends show housing becoming less affordable; in fact, of the population with the lowest incomes ($\leq 30\%$ AMI) nearly 3 of every 4 households pay more than half of their limited income for housing, leaving little left for other of life's necessity. [National Low Income Housing Coalition 2025 "The Gap" report]

There are not affordable homes for those households to move into; there is a shortfall of nearly 407,000 rental units affordable to VLI and ELI households. [National Low Income Housing Coalition 2025 "The Gap" report] The existing housing providers continue to produce affordable housing and preserve the affordable stock they are able, but a significant amount of the existing affordable stock is at risk of being lost to the population that needs it, as it ages out of its affordability restrictions.

The population in North Carolina is aging, which means there is an increasing need for housing that fits their needs and incomes. Currently 19 out of every 20 seniors lives alone [2016-2020 ACS]; living alone can be increasingly challenging as people age.

MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

North Carolina has seen an increase in median sales price and rents over the past decade. Incomes have not kept pace with rising housing costs which has led to affordability challenges, particularly for low-income households.

While housing costs vary by region, North Carolina continues to face a shortage of affordable housing for low-income households, particularly those earning 30% AMI or less. In urban areas, increased demand for housing and limited supply has driven up rents and housing prices. Unable to compete with higher income households for a limited number of homes, low-income workers in cities like Charlotte, Asheville, Durham, and Raleigh are being priced out of their neighborhoods. While housing costs may be lower in rural communities, incomes are often lower as well, making it difficult to buy, rent, or maintain homes. As a result, according to the 2016-2020 CHAS data, 1.04 million North Carolinians—more than one out of every four—spends more than 30% or more of their income on housing, leaving less money for other critical expenses like food, childcare, health expenses, and education.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2020	% Change
Median Home Value	154,900	182,100	18%
Median Contract Rent	624	749	20%

Table 33 – Cost of Housing

Data Source: 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	381,739	27.6%
\$500-999	636,988	46.1%
\$1,000-1,499	275,040	19.9%
\$1,500-1,999	63,254	4.6%
\$2,000 or more	24,722	1.8%
Total	1,381,743	100.0%

Table 34 - Rent Paid

Data Source: 2016-2020 ACS

Housing Affordability

Number of Units affordable to Households earning	Renter	Owner
30% HAMFI	108,815	No Data

Number of Units affordable to Households earning	Renter	Owner
50% HAMFI	394,515	260,115
80% HAMFI	892,980	691,830
100% HAMFI	No Data	1,009,725
Total	1,396,310	1,961,670

Table 35 – Housing Affordability

Data Source: 2016-2020 CHAS

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	0	0	0	0	0
High HOME Rent	0	0	0	0	0
Low HOME Rent	0	0	0	0	0

Table 36 – Monthly Rent

Data Source Comments:

Is there sufficient housing for households at all income levels?

Research published by the NC Chamber Foundation in 2024 estimated a housing supply gap of 764,000 total units (322,000 rental units and 442,000 units for purchase) by leveraging trends in household growth, housing affordability, housing conditions, and job growth projections. Findings from this report and analysis of US Census Bureau data reveal that while the housing unaffordability and instability resulting from this housing supply gap is experienced by households of all incomes and tenures, renters and households with low incomes are especially likely to struggle. For example, North Carolina renters are more than twice as likely as homeowners to report housing cost burden (41.8% of renter households compared to 18.2% of homeowners) and low-income households are more than nine times as likely as their higher income counterparts to report housing cost burden (52.3% of households earning 80% AMI or less compared to 5.7% of households earning more than 80% AMI).

How is affordability of housing likely to change considering changes to home values and/or rents?

As illustrated in Table 32, both median home values and median rents have increased in North Carolina from 2009 to 2020, by 18% and 20%, respectively. While an average annual increase of approximately 2% in median home values and rents may seem reasonable, these data do not reflect the nuances of housing affordability. For example, income growth during the same period has often lagged behind housing cost increases, meaning affordability has worsened even if percentage changes seem modest. Additionally, statewide averages do not capture the disproportionate impact on lower-income households.

In addition, North Carolina has seen housing unaffordability worsen in more recent years. COVID-19 pandemic-caused economic insecurity, high interest rates, and rapid increases in both rent and home prices, now coupled with disaster related damages from Hurricane Helene (2024) in 39 of the state's 100 counties, have only exacerbated the state's housing affordability challenges and undermined previous efforts to relieve the housing crisis. For example, the shrinking supply of low-rent units in recent years helps explain the high (and increasing) rates of cost burden noted above. While the number of low-rent units has decreased in nearly every state (47) between 2012 and 2022, North Carolina has experienced the third largest decrease in the number of low-rent units and the eighth largest percentage decrease. Between 2012 and 2022, North Carolina lost 31.2% of units with rents under \$600 (a loss of 139,000 units) and 34.6% of units with rents between \$600 and \$799 (a loss of 124,000 units) when adjusted for inflation. Meanwhile, the number of units with rents between \$1,400 and \$1,999 and \$2,000 or greater increased by 295.4% (227,000 units) and 261.7% (73,000 units), respectively. [Harvard Joint Center for Housing Studies, America's Rental Housing 2024]

In addition, home prices have surged nationally in recent years. According to the FHFA House Price Index, at their highest point, home prices increased 18.2% nationally from 2021-Q1 to 2022-Q1, with North Carolina outpacing the national trend, with a peak of 23.5% from 2021-Q2 to 2022-Q2. Although the pace of annual price growth has moderated in recent years, North Carolina home prices have still surged over the longer term—up 76.0% from just before the pandemic (2019-Q3) to late 2025 (2025-Q3). In the face of these high home prices—in addition to high interest rates—becoming a first-time homebuyer is increasingly unaffordable, requiring more capital to cover up-front and down payment costs needed to secure a mortgage and necessitating ever-higher incomes to qualify and to make the ongoing mortgage payments.

Incomes across the state have simply not kept pace with housing costs. Some of the occupations in North Carolina that employ the most people—fast food workers and retail salespersons—pay the least, with median hourly wages that are insufficient to afford modest housing. According to data from the NC Department of Commerce, North Carolina is projected to add 509,540 jobs between 2022 and 2032. Among the occupations that will have the largest number of annual job openings are in food preparation and services, office and administrative support, and recreation—occupations that pay less than \$30,000 per year. Without a significant increase in wages or subsidized affordable housing or rental assistance, low-income households will continue to struggle to pay for housing.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

While HUD does not provide statewide estimates for fair market rent or HOME rent limits, the Brunswick County HUD Metro FMR Area has a 2025 median household income identical to the statewide median household income of \$95,000 and can provide an approximate benchmark for North Carolina's rental market broadly.

According to Redfin, the median rent for all bedrooms and all property types in North Carolina was \$1,480 in March 2025, compared to the fair market rent of \$1,132 for a two-bedroom apartment in the Brunswick County area. The High HOME rent rate for a two-bedroom in that area is also \$1,132 while the Low HOME rent rate is \$1,058. This trend—where local median rents exceed both Fair Market Rent and HOME rents—is consistent across much of North Carolina and reinforces how difficult it can be for lower-income households to find affordable homes. Combined with the large housing supply gap, high rates of cost burden, decline in low-rent units, and sales price increases discussed throughout this section, these findings further support the need for developing and preserving more affordable housing across North Carolina.

Discussion

North Carolina faces a significant shortage of safe, affordable housing. Rising home prices and rents, combined with high interest rates and stagnant wages, have made housing increasingly unaffordable. While this shortage affects households across all income levels, the impact is especially severe for renters and households with lower incomes.

MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

North Carolina has an aging housing stock; 37.4% of all housing units were built before 1980. The housing stock in metropolitan areas and surrounding counties tends to be newer than that of more rural counties. Generally, renter-occupied units are slightly older. As of the 2016-2020 ACS the median year built for renter-occupied units is 1987 compared to 1990 for owner-occupied units. As of 2024 the median year built for renter-occupied units was 1992, and for owner-occupied units was 1994. [2024 1-yr ACS] Renter-occupied units are more likely to have conditions like inadequate plumbing or kitchen facilities, overcrowding and cost-burden. Between the 2016-2020 ACS and the 2024 1-yr ACS the percent of renter-occupied units that had one or more condition problems rose from 44.0% to 48.8%. For owners the percent rose in that time range from 19.5% to 21.0%. [2016-2020 ACS, 2024 1-yr ACS] Older housing is also more at risk for lead-based paint hazards. [HUD 2021 final report “American Healthy Homes Survey II Lead Findings”]

The vacancy rate in North Carolina (14.0%) is higher than in the United States (11.6%). The most common reasons for vacancy are “seasonal, recreational or occasional use”, “for rent” and “other”. Urban counties like Wake, Mecklenburg and Durham have vacancy rates below 8% which suggest tight real estate markets while more rural counties like Montgomery, Warren, Brunswick, and Swain have vacancy rates above 32%. Across the state, the large percentage of vacant units are for “other” reasons (39%). [2016-2020 ACS]

Describe the jurisdiction's definition of "standard condition" and "substandard condition but suitable for rehabilitation":

Standard Condition: The unit (a) meets NSPIRE and all state and local codes and (b) has none of the conditions of overcrowding, lack of kitchen/plumbing facilities and/or other utilities.

Substandard Condition: The unit does not meet code standards or has one of the selected conditions (overcrowding, lack of kitchen/plumbing facilities and/or other utilities).

Suitable for Rehabilitation: The amount of work required to bring the unit up to minimum code standard, and the existing debt on the property, together, are less than the fair market value of the property.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	506,703	19%	573,881	42%
With two selected Conditions	8,892	0%	31,740	2%

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With three selected Conditions	958	0%	1,798	0%
With four selected Conditions	0	0%	46	0%
No selected Conditions	2,133,296	81%	774,278	56%
Total	2,649,849	100%	1,381,743	100%

Table 37 - Condition of Units

Data Source: 2016-2020 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	810,370	31%	340,422	25%
1980-1999	912,189	34%	498,591	36%
1950-1979	731,381	28%	419,463	30%
Before 1950	195,909	7%	123,267	9%
Total	2,649,849	100%	1,381,743	100%

Table 38 – Year Unit Built

Data Source: 2016-2020 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	927,290	35%	542,730	39%
Housing Units build before 1980 with children present	400,040	15%	246,775	18%

Table 39 – Risk of Lead-Based Paint

Data Source: 2016-2020 ACS (Total Units) 2016-2020 CHAS (Units with Children present)

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	0	0	0
Abandoned Vacant Units	0	0	0
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 40 - Vacant Units

Data Source: 2005-2009 CHAS

Describe the Need for Owner and Rental Rehabilitation Based on the Condition of the Jurisdiction's Housing

Owner and rental rehabilitation are necessary to improve accessibility, enhance residential stability, and remove health hazards. Almost 3 in 10 housing units in North Carolina have at least one problem - incomplete kitchen facilities, incomplete plumbing facilities, overcrowding or cost-burden. Renter-occupied housing in particular needs rehabilitation – 44.0% of rental units have at least one problem and 32.7% were built before 1980. [2016-2020 ACS] Almost 73% of owners and renters earning 30% of area median income or less have at least one housing problem.

The physical and financial burdens of home maintenance can be overwhelming for seniors, particularly those with limited income. Rehabilitation allows elderly residents to age in place, deferring the costs of institutional care. The population of North Carolina is aging; 54.6% of owner-occupied households and 28.0% of renter-occupied households have a householder aged 55 or older. [2016-2020 ACS] Thus, the need for rehabilitation will only increase across the state.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

Close to 1.5 million occupied homes in North Carolina are at risk for lead-based paint hazards. Of those homes built before 1980, 41.2% have children age 6 or younger present. [2016-2020 ACS] The October 2021 American Healthy Homes Survey report says that low-income households had a higher rate of lead-based paint hazards (23.9%) than higher-income households (15.8%); government-assisted households had a lower occurrence of LBP hazards (11.1%) compared to those not receiving support (19.9%). [HUD's October 2021 American Healthy Homes Survey] Approximately 1.75 million North Carolina households earn less than 80% AMI and it is likely that many are living in units with LBP hazards. [2016-2020 CHAS]

Discussion

MA-25 Public and Assisted Housing – 91.210(b)

Introduction

Although some information is provided below, the State does not collect information from the public housing authorities that serve the non-entitlement regions of the state. Public housing authorities are governmental (or quasi-governmental) entities that manage various housing assistance programs on behalf of the U.S. Department of Housing and Urban Development (HUD). These programs include Public Housing, Section 8 Housing choice Vouchers, and other programs.

According to HUD’s Public and Indian Housing Program’s PH Dashboard, public housing developments provide housing to more than 45,000 North Carolinians, of which approximately 45% are children and 31% are elderly or have a disability. The households have an average annual household income of \$17,206, and an average monthly rent of \$373. [HUD Public Housing Dashboard, p. 6 of 7]

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	61	0	15,635	30,106	583	11,527	662	2,837	1,944
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 41 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

There are approximately 81 public housing authorities in the state of North Carolina which oversee 207 housing developments. The occupancy rate for public housing units in NC is 92%. [HUD Public Housing Dashboard, p. 4 and 6 of 7]

There are 22,056 units of public housing available in developments across the state that are managed by their local or regional public housing authority (PHA). [HUD Public Housing Dashboard, p. 3 of 7] The North Carolina Consolidated Plan Partners do not operate, own, or manage any public housing units. In North Carolina, PHAs in the larger suburban and metropolitan areas traditionally own and manage public housing developments.

Public Housing Condition

Public Housing Development	Average Inspection Score

Table 42 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

As noted above, the state does not oversee or track public housing units.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

As stated prior, the state specifically does not have direct oversight over local PHAs.

Discussion:

The 22,000 unit Public Housing Authority stock in North Carolina (housing stock outside the purview of the state agencies preparing this Consolidated Plan) comprise a very valuable part of the housing infrastructure in the state, housing some of the poorest and most vulnerable residents. Nearly a third of the housing units house elderly North Carolinians; as the state’s population ages public housing may prove even more valuable.

MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	2049	565	3905	616	0
Households with Only Adults	27	19	2	48	0
Chronically Homeless Households	961				0
Veterans	229				0
Unaccompanied Youth	242				0

Table 43 - Facilities and Housing Targeted to Homeless Households

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

The Emergency Solutions Grant (ESG), administered by NC DHHS, is responsible for ensuring that CoCs coordinate mainstream services to assist homeless individuals and families achieve housing stability as listed in 24 CFR 576.400(c). The CoCs are made up of coalitions of supportive housing and homelessness stakeholders including providers of housing as well as providers of services for individuals and families experiencing homelessness. These groups are made up of public and private housing providers, state-supported Managed Care Organization/Local Management Entities (MCO/LMEs) representatives providing mental and behavioral health services, vocational rehabilitation staff providing employment services, Social Security offices engaged in SAMHSA's SSI/SSDI Outreach, Access, and Recovery (SOAR) program, local Department of Social Services staff, as well as organizations providing health care and coordination of care services to people experiencing homelessness. CoCs are also required to use coordinated entry, which is an important process through which people experiencing homelessness can access the crisis response system in a streamlined way, have their strengths and needs assessed, and quickly connect to appropriate mainstream services in the community. The coordinated entry process provides individuals with a choice, rather than being evaluated for a single program within the system.

Landlords within the state of NC often charge higher rent for individuals with poor credit histories. HOPWA eligible individuals with poor credit and rental history have a difficult time finding affordable, decent, and safe housing. HOPWA eligible individuals cannot be transferred into other housing programs due to issues with criminal history, credit history, and extremely long and/or closed wait lists. Our There is a need for a statewide landlords and property owner training to educate landlords and property owners about fair housing practices to ensure that landlords and property owners are not discriminating against eligible individuals due to poor rental histories. There is also a need for a statewide free credit repair program to eliminate these barriers to housing eligible HOPWA participants. This service is trying to find a sponsor or a non-profit that can provide this service.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

The NC Plan Partners and other providers coordinate and/or fund several organizations across the state that provide services and facilities that meet the needs of the homeless and special populations such as families with children, veterans and their families, and unaccompanied youth. Services include homeless outreach; homeless intervention and prevention services; emergency shelter; transitional housing for individuals, families, veterans and youth; Permanent Supportive Housing; and traditional permanent affordable housing.

The NC Plan Partners use the CPD program to assist people experiencing homelessness with a variety of resources identified below.

CDBG: NC Commerce provides funding for public facilities such as transitional housing and emergency shelters and infrastructure support for permanent multifamily and single-family housing through the Neighborhood Revitalization (NR) program. A facility funded in Butner NC a few years ago is still in operation and serves homeless veterans by providing supportive services and housing after being dismissed from Veteran's Administration hospitals. The City of Sanford houses an emergency shelter with the City of Sanford and the Sanford Housing Authority. CDBG-NR has also funded domestic violence shelters and food banks/pantries especially during the pandemic and most recently Hurricane Helene where CDBG could fund up to 100% of documented need for public service needs in a FEMA declared disaster area. The overall goal of CDBG-NR is to preserve and create affordable housing for people at or below 80% of the area's median income.

RHP: In 2021, North Carolina was awarded funds for the Recovery Housing Program (RHP), a pilot program to assist people with substance-abuse disorders with stable housing. NC Commerce has since received an annual allocation totaling over 4.5 million dollars. Workforce housing is being constructed with these funds in Buncombe County with several partners in the area.

HOME and NHTF: Along with the Low-Income Housing Tax Credit and state funds, NCHFA utilizes HOME and NHTF to create and preserve affordable rental units. Properties receiving tax credits are required to participate in the Targeting Program, which sets aside between 10% and 20% of units for people with disabilities. NCHFA also offers the Supportive Housing Development Program to help nonprofit organizations and local governments build and rehabilitate emergency and permanent housing for people who are experiencing homelessness or have disabilities or other special needs such as substance use recovery. NCHFA partners with DHHS to provide integrated permanent supportive housing options to North Carolinians across state through the Transitions to Community Living Voucher, the Targeting Program and Key Rental Assistance.

HOPWA: For persons living with AIDS or HIV, NC DHHS assists using HOPWA funds with tenant-based rental assistance, short-term rental, mortgage, and utility assistance, and permanent housing placement services.

ESG: Through the ESG program, NC DHHS funds approximately 65 nonprofit agencies and local government entities statewide that provide shelter and services and rapid rehousing financial assistance and services for homeless persons including families with children, veterans, victims of sexual assault, and victims of domestic violence. Many subrecipients provide services to a variety of subpopulations of those experiencing homelessness; however, there are also subrecipients who focus on a particular subpopulation including those experiencing chronic homelessness, families with children, veterans and their families, and unaccompanied youth. Additionally, each Continuum of Care throughout the state

has a process for determining their priorities of service; many communities set their priorities for the subpopulations.

MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

HOPWA Assistance Baseline Table

Type of HOWA Assistance	Number of Units Designated or Available for People with HIV/AIDS and their families
TBRA	187
PH in facilities	0
STRMU	410
ST or TH facilities	0
PH placement	40

Table 44– HOPWA Assistance Baseline

Data Source: HOPWA CAPER and HOPWA Beneficiary Verification Worksheet

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

<

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

The NC Consolidated Plan address the special needs of the non-homeless through the CDBG, HOME, and the NHTF programs. Under the CDBG Neighborhood Revitalization (CDBG-NR) program, local governments may request funding for transitional and permanent supporting housing for special needs populations such as the elderly, frail elderly, youth in and aging out of foster care, persons with disabilities (mental, physical, and developmental), persons with alcohol and substance abuse addictions, and persons with HIV/AIDS. The CDBG-NR program also focuses on the rehabilitation of homeowner-occupied dwellings. Similar options are available through the HOME and the Low-Income Housing Tax Credit programs. North Carolina has also been selected as an eligible jurisdiction for the pilot Recovery Housing Program (RHP) that will fund stable housing for persons with substance abuse disorders. As stated earlier, this project is underway in Buncombe County for workforce housing for persons dealing with substance abuse.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

N/A

MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

Program design efforts, research, and data and policy analysis from Consolidated Planning partners and other North Carolina stakeholders provide insight into how land use, planning, and other public policies affect the development of affordable housing. While statewide laws can present opportunities or barriers to affordable housing (e.g., the North Carolina State Fair Housing Act prohibits discrimination in the siting of residential developments containing affordable housing), local governments in North Carolina have primary control over land use and develop their own zoning and development guidelines in accordance with state law. These local policies can promote more affordable housing with strategies ranging from more permissive zoning or streamlined permitting processes to local gap financing or selling/leasing public land. In addition to policies impacting housing supply, ensuring and increasing access to existing opportunities such as Housing Choice Vouchers and rental assistance can also lower barriers to affordable housing.

Other land use, planning, and programmatic policies can discourage affordable housing development and are described in greater detail below:

- High costs to develop and maintain affordable housing: The costs to develop affordable housing have significantly increased in recent years, driven by rising construction costs, land prices, interest rates, and operating costs. These increases drive up the costs to own a home and both to develop and operate affordable housing. For example, according to data from the Federal Reserve Bank of St. Louis, the cost of single-family and multifamily construction materials increased by 34% and 35%, respectively from January 2020 to January 2025. In addition, developers and residents of affordable housing have seen increases in local permits and impact fees, operating costs, insurance, and local property taxes in recent years.

Insufficient funding for affordable housing:

The expectations of affordable housing to offer long-term affordability and to comply with a range of funding, as well as permitting and zoning, requirements can result in higher costs to develop and maintain affordable housing. Local, state, and federal funding has been able to keep pace with these rising costs, which has resulting in fewer affordable homes being created per dollar in public funding.

Zoning ordinances: In many communities, much of the developable land is zoned exclusively for single-family use, making affordable rental property development challenging. Even when projects receive variances, navigating the approval and appeal process can add substantial—and at times prohibitive—time and costs to the project.

Expensive or lengthy local permit and/or approval processes: Developers of affordable housing often face substantial fees for permits and impact fees, and have to navigate lengthy review processes, which can extend project timelines and add costs to the project.

MA-45 Non-Housing Community Development Assets – 91.215 (f)

Introduction

Economic Development Market Analysis

Note: Tables 45-51 have been updated to reflect the most current available statewide North Carolina data identified during this revision. ACS-based tables use 2024 ACS 1-Year Estimates; LEHD/LODES job data use 2023, the most current LODES year available for North Carolina at the time of revision. Values are rounded to preserve the existing Consolidated Plan table format.

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	89,400	72,900	2	2	0
Arts, Entertainment, Accommodations	471,800	455,300	9	9	0
Construction	407,600	330,900	8	7	-1
Education and Health Care Services	1,217,900	1,072,600	23	22	-1
Finance, Insurance, and Real Estate	413,700	323,400	8	7	-1
Information	99,800	74,600	2	2	0
Manufacturing	521,300	478,900	10	10	0
Other Services	257,200	213,600	5	4	-1

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Professional, Scientific, Management Services	760,400	617,800	14	13	-1
Public Administration	251,600	249,700	5	5	0
Retail Trade	569,700	535,900	11	11	0
Transportation and Warehousing	280,500	254,700	5	5	0
Wholesale Trade	142,600	130,800	3	3	0
Total	5,483,500	4,811,100	--	--	--

Table 45 - Business Activity

Data 2024 ACS 1-Year Estimates (Workers) and 2023 LEHD/LODES Workplace Area Characteristics (Jobs). Figures are statewide North Carolina estimates and rounded.

Labor Force

Total Population in the Civilian Labor Force	5,520,000
Civilian Employed Population 16 years and over	5,309,000
Unemployment Rate	3.8
Unemployment Rate for Ages 16-24	9.7
Unemployment Rate for Ages 25-65	3.4

Table 46 - Labor Force

Data Source: 2024 ACS 1-Year Estimates / Census Reporter statewide North Carolina profile.
 Comments: Values rounded for consistency with the existing Consolidated Plan table format.

Occupations by Sector	Number of People
Management, business and financial	1,107,000
Farming, fisheries and forestry occupations	16,000
Service	853,000
Sales and office	1,048,000
Construction, extraction, maintenance and repair	486,000
Production, transportation and material moving	812,000

Table 47 – Occupations by Sector

Data Source: 2024 ACS 1-Year Estimates, occupation groups for the civilian employed population 16 years and over, North Carolina statewide. Values rounded.

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	3,085,000	67%
30-59 Minutes	1,145,000	25%
60 or More Minutes	370,000	8%
Total	4,600,000	100%

Table 48 - Travel Time

Data Source: 2024 ACS 1-Year Estimates, Travel Time to Work for workers 16 years and over who did not work from home, North Carolina statewide. Categories aggregated to match the existing table.
 Comments:

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	298,000	22,000	223,000
High school graduate (includes equivalency)	1,128,000	55,000	382,000
Some college or Associate's degree	1,648,000	72,000	386,000
Bachelor's degree or higher	1,649,000	44,000	268,000

Table 49 - Educational Attainment by Employment Status

Data Source: 2024 ACS 1-Year Estimates, Educational Attainment by Employment Status for the Population 25 to 64 Years, North Carolina statewide. Values rounded.
 Comments:

Educational Attainment by Age

	Age				
	18-24 yrs	25-34 yrs	35-44 yrs	45-65 yrs	65+ yrs
Less than 9th grade	17,000	57,000	70,000	172,000	149,000
9th to 12th grade, no diploma	62,000	85,000	87,000	237,000	183,000
High school graduate, GED, or alternative	282,000	405,000	433,000	1,069,000	768,000
Some college, no degree	310,000	389,000	378,000	858,000	477,000
Associate's degree	82,000	178,000	187,000	424,000	215,000
Bachelor's degree	165,000	478,000	505,000	959,000	427,000
Graduate or professional degree	22,000	243,000	302,000	551,000	312,000

Table 50 - Educational Attainment by Age

Data Source: 2024 ACS 1-Year Estimates, Educational Attainment by Age, North Carolina
 Comments: statewide. Values rounded and age bands aggregated to match the existing table layout.

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	\$28,100
High school graduate (includes equivalency)	\$36,400
Some college or Associate's degree	\$42,700
Bachelor's degree	\$64,500
Graduate or professional degree	\$80,600

Table 51 – Median Earnings in the Past 12 Months

Data Source: 2024 ACS 1-Year Estimates, Median Earnings in the Past 12 Months (2024 inflation-adjusted dollars) by Educational Attainment for the Population 25 Years and Over, North Carolina statewide. Values rounded.

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

Describe the workforce and infrastructure needs of the business community:

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

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Discussion

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

More than one in four (27.9%) households in North Carolina have at least one housing problem as defined by the 2016-2020 Comprehensive Housing Affordability Strategy (CHAS) data—incomplete kitchen facilities, incomplete plumbing facilities, overcrowding, or cost burden. Renter households are especially likely to experience these challenges (44.0%).

While far fewer households in North Carolina experience multiple housing problems simultaneously—44,600 or 1.02% of households in the state—renter and low-income households experience these compounding challenges at much higher rates according to data from the 2023 U.S. Census Bureau Public Use Microdata Sample (PUMS). Renter households are 5.8 times more likely to experience multiple housing problems than their owner counterparts in North Carolina. Low-income households earning 80% AMI or less are 16.7 times more likely to experience multiple housing problems than households earning more than 80% AMI.

There are multiple areas of the states with a concentration of households experiencing multiple housing problems, defined as any area where the percentage of households with two or more housing problems is greater than the state average of 1.02%. Because data from PUMS were used for this analysis, the number of households experiencing multiple housing problems is estimated at the Public Use Microdata Areas (PUMA) geography. PUMAs are non-overlapping areas containing no fewer than 100,000 people each. Given these population thresholds, in rural areas, multiple counties often make up a single PUMA. By this definition, there are 32 PUMAs in North Carolina—containing 42 counties [1]—with a concentration of households with multiple housing problems: Buncombe, Burke/McDowell, Cabarrus, Columbus/Bladen/Robeson, Durham, Forsyth, Franklin/Vance, Gaston, Guilford, Haywood/Madison/Swain/Graham/Jackson, Henderson/Transylvania, Hoke/Richmond/Scotland, Jackson/Macon/Cherokee/Clay, Johnston, Lenoir/Onslow/Jones, Mecklenburg, Nash/Edgecombe, Randolph, Rutherford/Cleveland/Polk, Sampson/Duplin, and Union/Anson. While these PUMAs/counties are located in western, eastern, and central parts of the state, most are in rural areas.

[1] County names separated by "/" indicate low-population areas where multiple counties are combined into a single PUMA.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

This analysis used the 2020 U.S. Department of Housing and Urban Development's "Racially/Ethnically Concentrated Areas of Poverty" (R/ECAP), which identifies census tracts with a non-white population of 50% or more AND a poverty rate that exceeds 40% or is three or more times the average tract poverty rate for the metropolitan/micropolitan area (whichever is lower).

Utilizing this definition, North Carolina has 79 census tracts where racial and ethnic minorities and low-income families are concentrated. These census tracts are located in 23 of the state's 100 counties. R/ECAPs are located across the entire state with 34 of the qualifying census tracts in urban areas, 25 in rural, and 20 in suburban. The counties with the largest number of R/ECAPs are all in more urban areas: Mecklenburg County (Charlotte) has the highest number with 11 qualifying census tracts, followed by Forsyth County (Winston-Salem) with 10 R/ECAPs and Guilford County (Greensboro) with 6 R/ECAPs.

What are the characteristics of the market in these areas/neighborhoods?

On average, R/ECAP census tracts in North Carolina tend to have higher vacancy rates, an older housing stock, lower property values, and lower monthly housing costs when compared to non-R/ECAP census tracts in the state. However, the housing market in R/ECAP census tracts are less affordable to the local residents. For example, the percentage of owner households in R/ECAPs experiencing housing cost burden is 1.5 times greater than owner households in non-R/ECAPs. For renter households, the percentage of households in R/ECAPs experiencing housing cost burden is 1.2 times greater than households in non-R/ECAPs. These differences in housing unaffordability are even more pronounced in the rural R/ECAPs.

R/ECAP census tracts tend to have different characteristics between urban and rural areas of North Carolina. For example, R/ECAPs in urban areas often have higher housing costs and home values, lower vacancy rates, and closer proximity to jobs and transit, while R/ECAPs in more rural areas tend to have lower housing costs but less access to jobs and transit.

Are there any community assets in these areas/neighborhoods?

Yes, there are community assets and resources in each region with R/ECAPs in North Carolina. This includes job centers, social services, schools, community facilities and community centers, libraries, cultural centers, and green space. In urban areas, these resources tend to be in closer proximity than in the state's more rural areas.

Are there other strategic opportunities in any of these areas?

The State administers several programs to facilitate the development and preservation of affordable housing, especially in lower income and non-entitlement jurisdictions. The Rental Production Program, Rental Preservation Loan Program, Self-Help Loan Pool, the Single Family Rehabilitation Loan Pool, and the Community Partners Loan Pool are some of the state programs that invest in transformative housing projects for low-income renters, homebuyers, and homeowners. These programs strategically invest where and when the housing market alone is insufficient. For example, residential development in rural areas is often more challenging in North Carolina because construction costs do not vary proportionately to what rents can be charged or what sale prices can be achieved. These challenges are compounded by the reality that rural areas do not often support larger developments, so economies of scale are not present to the same extent as in more urban counties. These state programs help address the range of

challenges present in making affordable housing feasible with financing specifically designed for households and communities that have historically been excluded from the housing market

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

The Updated Numbers from the NC Justice Center and NC Broadband Initiative

The Center's expanded research highlights how the wealth gap translates directly into a digital gap across the entire state:

- **Low-Income Households (<\$20,000):** Between **45% and 50%** do not have a broadband internet subscription at home.
- **High-Income Households (>\$75,000):** Only **6%** lack home broadband access.
- **The Urban/Suburban Myth:** The digital divide is often categorized as a purely rural issue, but the Justice Center noted that **730,000 urban and suburban residents** lack access, compared to **830,000 rural residents**

The Post-ACP Crisis: The broader state data from the North Carolina Department of Information Technology (NCDIT) notes that affordability challenges have intensified. The federal **Affordable Connectivity Program (ACP)**, which previously provided low-income families with monthly internet discounts, expired after funding ran out, putting thousands of low-income NC households at risk of losing their connections.

State Funding Initiatives: The \$86M "Stop-Gap Solutions" Program

Administered by the North Carolina Department of Information Technology (NCDIT), the **\$86 million Stop-Gap Solutions program** utilizes federal American Rescue Plan Act (ARPA) funds specifically to target the exact issue raised by the NC Justice Center: small, isolated pockets of unserved homes left behind by major infrastructure grids **Targeted Last-Mile Extensions:** Instead of building entirely new networks, it funds broadband providers to run "line extensions" to small groups of homes and individual households that are close to existing grids but lack actual hookups.

- **Recent 2026 Milestone:** Governor Josh Stein announced nearly **\$26 million in new awards** through this program.
- **Direct Scope:** This specific batch of funding expands high-speed infrastructure to **5,161 rural homes, businesses, and community institutions across 66 NC counties.**
- **Strict Timeline:** Because it relies on ARPA funding, the state is legally required to expend all of these program funds by **December 31, 2026**, making it an aggressive, fast-tracked deployment.

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

Low- and moderate-income (LMI) households face a severe, compounding need for digital access because modern society treats high-speed internet as a basic utility, yet the market prices it as a luxury. When a family cannot afford a reliable connection, they are effectively locked out of the modern economy, education system, and healthcare infrastructure.

The digital need in LMI households spans three core areas: affordability, hardware access, and digital literacy.

1. The Affordability Gap

For high-income households, internet service is a minor utility bill. For LMI households, it represents a major financial sacrifice.

- **The Cost Barrier:** Standard broadband subscriptions in North Carolina typically cost \$60 to \$100 per month. For a family earning under \$25,000, this single bill can consume up to 5% of their entire monthly income.
- **The Post-ACP Crisis:** Following the expiration of the federal Affordable Connectivity Program (ACP)—which provided a \$30 monthly subsidy to low-income families—millions of households lost their discounts. Without this support, many LMI families are forced to choose between internet access and other necessities like food, medicine, or electricity.
- **The Mobile-Only Trap:** To save money, many low-income households rely exclusively on smartphones with limited data plans for their internet access. This is highly inefficient for complex tasks like writing essays or working remotely.

2. The Device Deficit

An internet connection is useless without the proper hardware to utilize it. LMI households face a stark deficit in functional, modern devices.

- **Shared Technology:** In many LMI homes, multiple school-aged children and adults must share a single, aging laptop or tablet.

- **Outdated Hardware:** LMI individuals frequently rely on older, donated, or refurbished devices that cannot support modern software, video conferencing tools, or security updates.
- **No Desktop Infrastructure:** Essential tasks like formatting a resume, filling out a job application, or building a spreadsheet are incredibly difficult to execute on a mobile phone or a low-powered tablet.

3. Structural Barriers to Essential Services

Because LMI households lack adequate internet and devices, they experience a compounding disadvantage in daily life:

- **The Education Gap:** Students in LMI households struggle to complete homework, research projects, or access online grading portals. This places them at a severe academic disadvantage compared to wealthier peers.
- **Economic Immobility:** Job hunting has shifted almost entirely online. Without broadband, LMI adults cannot easily search for employment, submit digital applications, or access remote work opportunities that could lift them out of poverty.
- **Healthcare Isolation:** Low-income and rural residents often face transportation barriers to see doctors. While telehealth offers a solution, LMI patients cannot utilize video consultations due to slow data speeds or a lack of webcam-enabled devices.

4. The Digital Literacy Deficit

Even when infrastructure and devices are provided, a lack of technical training can prevent LMI individuals from fully utilizing these tools.

- **Navigating the Digital Economy:** LMI adults often need foundational training in online privacy, spotting phishing scams, using communication platforms like Zoom or Microsoft Teams, and navigating online banking or government benefit portals.

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

Introducing a second or third broadband Internet service provider (ISP) into a jurisdiction is a fundamental requirement under [U.S. Department of Housing and Urban Development \(HUD\) guidelines](#). Increased competition addresses the core root of the digital divide by targeting artificial affordability barriers, market complacency, and systemic economic exclusion in low- and moderate-income (LMI) neighborhoods. The North Carolina League of Municipalities highlights that the broadband gap isn't just an economic or quality of life issue in rural communities, but it has health implications too. Without reliable broadband infrastructure, rural communities can't take full advantage of health innovations, such as telemedicine and tele-dentistry, which could help fill the health care workforce shortage in rural communities.

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

Climate change is being felt in North Carolina. In recent years, the state has experienced flooding and extreme rainfall from a number of storms. Since 2020, Hurricanes Isais, Eta, Henri, Fred, Colin, Ian, Debby, and Helene have all resulted in death with those and many other severe storms causing significant property damage. In 2024, Hurricane Helene resulted in severe flooding, property damage, the death of over 100 people in North Carolina, and almost \$60 billion dollars in overall damage.

According to the North Carolina Climate Science Report (revised in 2020) from NC State, the state can expect to see disruptive sea level rise, rising temperatures leading to dangerous heat, and extreme rainfall as a result of climate. Hurricanes and other weather systems will become more frequent and more intense. Flooding will occur not only on the coast but also farther inland, potentially requiring people to move to higher ground. A 2025 study from the University of North Carolina at Chapel Hill and the North Carolina Policy Collaboratory finds that flooding, and especially repeat flooding, is more prevalent than previously recognized. The North Carolina Department of Environmental Quality has developed the NC Climate Risk and Resiliency Plan to address some of these challenges and, in 2018, the Governor signed Executive Order No. 80 to address climate change in the state.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

Research shows the climate change disproportionately impacts low-income communities. Low and moderate-income households are more likely to live in areas with greater exposure to natural disasters. These communities are also less likely to have the resources and capacity to prepare and recover from climate events. Additionally, climate change will exacerbate existing health conditions in these communities due to degraded air quality, dangerous heat levels, and increased mold.

The North Carolina Climate Risk Assessment and Resilience Plan identifies flooding as the biggest risk for housing and marks that aging infrastructure and housing are vulnerable.

According to a 2017 analysis by the NYU Furman Center, 281,881 units (6% of all units) are located in the floodplains of North Carolina. Of those units, 70,665 are occupied by renter households and 4,936 are subsidized rental housing units. The estimated poverty rate in the flood plains is 17.7% which is higher than the statewide average of 14%. Thus, it is likely that many low and moderate-income households in North Carolina are vulnerable to climate change.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The strategic plan outlines strategies to be used by the NC Plan Partners and other stakeholders to target the priority need groups identified over the next five years. The Strategic Plan is developed using the Housing and Market Analysis and Needs Assessment to create goals and objectives as well as strategies to achieve those goals. Based on the severity of need, the North Carolina Plan Partners assigned priorities to populations differentiated by income, tenure, and homeless/special need status. Priorities are addressed as High, Medium, and Low. The funding partners will deploy its allocations based on priority needs and each agency's target market. This cycle's five-year strategy, called the North Carolina Consolidated Plan 2026-2030, lays out the priority needs for the state, which are based on housing and population information captured from census data special tabulations that yield the incidence of certain housing problems (overcrowding, inadequate plumbing facilities, cost burden, etc.) among the population. The five-year plan also sets the framework from which each year's annual action plan can be drawn. The Annual Action Plan further details how the state will accomplish its five-year goals during annual program cycles.

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

Geographic Area

Table 1 - Geographic Priority Areas

1	Area Name:	Statewide
	Area Type:	Statewide
	Other Target Area Description:	Statewide
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	

Table 52 - Geographic Priority Areas

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

Table 53 – Priority Needs Summary

1	Priority Need Name	Housing for households under 30% AMI
	Priority Level	High
	Population	Extremely Low Low Families with Children Elderly Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence
	Geographic Areas Affected	
	Associated Goals	Homeowner Housing Rehabilitation Affordable Homeownership Affordable Rental Housing Development Affordable Rental Housing Rehabilitation ESG Housing Stability ESG Crisis Response
	Description	The need for affordable rents and units is a main issue for this group on residents.
	Basis for Relative Priority	The need for affordable housing for residents at 30% AMI is very concerning in this state. The National Low Income Housing Coalition estimates that the shortage is over 210,000 affordable housing units for this group of low income residents.
	2	Priority Need Name
Priority Level		High

	Population	Low Moderate Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families
	Geographic Areas Affected	
	Associated Goals	Homeowner Housing Rehabilitation Affordable Homeownership Affordable Rental Housing Development Affordable Rental Housing Rehabilitation
	Description	The elderly, domestic violence victims, person with disabilities are in need of safe and affordable housing.
	Basis for Relative Priority	<p>This option will assist low-and-moderate-income homeowners who are elderly or have disabilities face serious housing challenges. For seniors, the physical and financial burdens of home maintenance can be overwhelming; more than 48% of adults over 55 are housing cost-burdened, meaning they pay more than 30% of their monthly income in housing expenses. Furthermore, most homes are not designed for people with mobility or dexterity limitations. As a result, many low-income homeowners who are elderly or have disabilities cannot safely remain in their homes and must enter institutional care.</p> <p>Roughly 14%, or 1.43 million, of all North Carolinians have one or more disabilities. Persons 65 and older are more affected, with 42% of disabled individuals in this age range. Because people with disabilities are more likely to be low-income or extremely low-income, they are more likely to be cost-burdened. Additional barriers such as accessibility and discrimination further limit their housing options.</p> <p>Domestic violence and living with HIV/AIDS or addiction can precipitate housing insecurity and homelessness.</p>
3	Priority Need Name	Housing for households under 31-60% AMI
	Priority Level	High

	Population	Low Moderate Large Families Families with Children Elderly Rural Individuals Families with Children Persons with HIV/AIDS Victims of Domestic Violence
	Geographic Areas Affected	
	Associated Goals	Homeowner Housing Rehabilitation Affordable Homeownership Affordable Rental Housing Rehabilitation ESG Housing Stability ESG Crisis Response
	Description	The primary focus is on housing choices for residents at 31-60% AMI
	Basis for Relative Priority	The housing stock in NC is not meeting the need of this demographic. Additionally, the Low Income Housing Report that this is a critical need and a shortage exist in affordable rents and homeownership opportunities.
4	Priority Need Name	Housing for households under 61-80% AMI
	Priority Level	Low
	Population	Low Moderate Large Families Families with Children Elderly Rural Chronic Homelessness
	Geographic Areas Affected	

	Associated Goals	Homeowner Housing Rehabilitation Affordable Homeownership Affordable Rental Housing Development Affordable Rental Housing Rehabilitation
	Description	This priority is based on need and opportunity. Programs to assist these residents may provide down payment assistance or financing.
	Basis for Relative Priority	Disaster recovery and the lack of affordable housing has a great impact on residents who could move from rental to homeownership.
5	Priority Need Name	Housing for the homeless individuals
	Priority Level	High
	Population	Extremely Low Low Elderly Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS
	Geographic Areas Affected	
	Associated Goals	Homeowner Housing Rehabilitation Affordable Homeownership Affordable Rental Housing Development Affordable Rental Housing Rehabilitation ESG Housing Stability ESG Crisis Response
	Description	The number of homeless persons has increased in the State of NC. We see this in our Point in Time numbers and other data from the CoCs. The Recovery Housing program fills a gap when drugs and addiction are a part of the homeless situation.
	Basis for Relative Priority	With numbers increasing the priority is to increase housing stock, collaborate with partner agencies and explore other grant opportunities and private donations.

6	Priority Need Name	Neighborhood Revitalization
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Non-housing Community Development
	Geographic Areas Affected	
	Associated Goals	Homeowner Housing Rehabilitation Affordable Homeownership Affordable Rental Housing Development Affordable Rental Housing Rehabilitation
	Description	North Carolina' is still considered rural state and with the number of municipalities and counties, particularly in rural areas, have a high number of LMI residents. Improvements are needed in substandard or missing infrastructure, public facilities such as community centers and parks, and resources to support housing development, spur economic development, decrease disparities between these communities and the rest of the state, and mitigate the increased risk of natural disasters.
	Basis for Relative Priority	This will continue to be a priority due to the need for additional decent and affordable short-term and transitional facilities such as emergency shelters, to address the lack of funding for ongoing infrastructure maintenance and development that has resulted in infrastructure and community facility deficiencies, and the need for more jobs for LMI persons and assistance to small businesses. These issues have greatly impacted mostly rural and low-income areas in the state. This goal continues as a priority since Hurricane Helene and other weather related issues have slowed the progress of revitalizing many neighborhoods.
7	Priority Need Name	Hurricane Helene Recovery
	Priority Level	High

	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Rural Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities
	Geographic Areas Affected	
	Associated Goals	Homeowner Housing Rehabilitation Affordable Homeownership Affordable Rental Housing Development Affordable Rental Housing Rehabilitation ESG Housing Stability ESG Crisis Response
	Description	Hurricane Helene was a destructive force that impacted many residents Some were left homeless others lost businesses and many houses were destroyed. It will take years to recover. This will be a priority for many years to come.
	Basis for Relative Priority	The priority will be on rebuilding and relocating due to flooding and erosion. Infrastructure will be an integral part of the recovery. Many residents will not be able to return to their land to rebuild.
8	Priority Need Name	Non-Housing Community Development
	Priority Level	High

<p>Population</p>	<p>Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development</p>
<p>Geographic Areas Affected</p>	
<p>Associated Goals</p>	<p>Homeowner Housing Rehabilitation Affordable Homeownership Affordable Rental Housing Development Affordable Rental Housing Rehabilitation ESG Housing Stability ESG Crisis Response</p>

<p>Description</p>	<p>Public facilities include all improvements and facilities that are either publicly owned or that are traditionally provided by the government, or owned by a nonprofit, and operated to be open to the general public. This would include neighborhood facilities, firehouses, public schools, libraries, and non-permanent housing such as shelters and transitional facilities for the homeless and other special needs populations. Public improvements include streets, sidewalks, curbs and gutters, parks, playgrounds, water and sewer lines, flood and drainage improvements, parking lots, utility lines, and aesthetic amenities on public property such as trees, sculptures, pools of water and fountains, and other works of art. These activities are primarily funded through the CDBG Neighborhood Revitalization Program, Economic Development, and Infrastructure programs. Units of local governments identify its needs and provide the documentation in the CDBG application submitted to the State. The Rural Economic Development Division consistently receives requests for funds to build and rehabilitate public facilities for the aging, homeless and low- and moderate-income communities. REDD will also assist businesses with building reuse, infrastructure, tenant improvement and other CDBG eligible activities. In return, the businesses will create and retain jobs, primarily for LMI people.</p> <p>Recent natural disasters and the COVID-19 pandemic highlighted the needs for public facilities and improvements, especially non-permanent housing and broadband services. In addition to the Consolidated Plan that addresses housing and community development needs, Governor Cooper has released a statewide broadband plan that addresses infrastructure, affordability, and equity. The primary funding source to address the broadband needs is the American Rescue Plan Act funds that will be leverage with other state and private resources. ARPA funds will also be used in addition to CDBG, HOME, NHTF, HOPWA, and ESG to address permanent and non-permanent housing needs</p>
<p>Basis for Relative Priority</p>	<p>Increasing economic development activity especially in rural areas; to increase the availability of short-term and transitional housing options, especially to respond public health emergencies and natural disaster response; to create community facilities that will assist special populations including the elderly, disabled (physical, mental, developmental); and to provide public infrastructure to address water and sewer issues, promote health and wellness, and broadband/high-speed internet support. The local need will be identified by the local unit of government and presented to the state during the application process</p>

Narrative (Optional)

The North Carolina Consolidated Plan has eight priorities to address housing in our State. Hurricane Helene has delivered a major void in housing and housing affordability. Each of the eight categories make a concerted effort to assist the low and very low income as well as the moderate-income households. The rebuilding effort that has taken shape in Western NC will continue throughout the next 5 to 10 years.

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	TBRA is a required service in the 82 counties currently covered by NC HOPWA program. Lack of landlord participation in the HOPWA program results in a shortage of available housing stock. The NC HOPWA program staff is requiring all project sponsors to provide Resource ID services to identify more land participants and increase housing stock.
TBRA for Non-Homeless Special Needs	TBRA is a required service in the 82 counties currently covered by NC HOPWA program. Lack of landlord participation in the HOPWA program results in a shortage of available housing stock. The NC HOPWA program staff is requiring all project sponsors to provide Resource ID services to identify more land participants and increase housing stock.
New Unit Production	New housing units will be constructed in areas with an insufficient stock of affordable rental units and a significant number of low-income households with cost burden.
Rehabilitation	<p>There is a high need for rehabilitation of owner-occupied and rental properties serving low and moderate-income households in NC. These needs are caused by a number of factors, including rehabilitation and reconstruction of properties damaged in natural disasters, and properties that need to be modified to meet the needs of an aging population.</p> <p>Rehabilitation will be used in areas where there are a significant number of homeowners who are elderly, have disabilities or are low-income. Rehabilitation will increase the amount of decent, safe, and affordable housing allowing families and individuals to stay in their home.</p>
Acquisition, including preservation	Funds will be used to help low-income households purchase homes in high-cost areas and in rural markets. Under CDBG, acquisition, including preservation funds are also available to create or preserve affordable single-family and multi-family housings.

Table 54 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	46,417,547	0	0	46,417,547	230,000,000	NC Commerce receives CDBG funds for non-entitlement areas. The funds and program income are used primarily for economic development, housing rehabilitation and development support, public facilities, and infrastructure.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	13,159,440	9,800,000	0	22,959,440	73,400,000	NCHFA uses HOME funds and any program income to promote the production, ownership and rehabilitation of housing.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	5,441,502	0	0	5,441,502	0	NC DHHS administers HOPWA funding which assists with housing needs for persons with AIDS and HIV.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	5,126,360	0	0	5,126,360	20,505,440	ESG funding is administered by NC DHHS and supports housing stabilization and emergency shelter activities.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HTF	public - federal	Acquisition Admin and Planning Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership	4,000,000	200,000	0	4,200,000	19,600,000	NCHFA uses HTF funds for the development and rehabilitation of multifamily rental housing, including operating reserves.

Table 55 - Anticipated Resources

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The North Carolina General Assembly provides \$3M for HOME Match as a recurring appropriation. Additional match, if needed is secured through bond financing and excess HOME Match. HOME provides crucial support for multiple statewide housing programs, ranging from rental financing to home buyer assistance to home rehabilitation. HOME funds used to finance rental development are leveraged in conjunction with Low-Income Housing Tax Credits, state appropriations, as well as private and local funds. HOME funds used for homeownership provide shared mortgage financing used in conjunction with other Agency loan products and funds from nonprofits.

HOME funds that help finance loans for NCHFA's RPP program are used in conjunction with Low Income Housing Tax Credits, state-appropriated Workforce Housing Loan Program funds, and other private and local funding. LIHTC developments leverage private, state and local funds to build and rehabilitate rental housing. In NCHFA's CPLP program, HOME funds finance second mortgages that are combined with NCHFA's NC Home Advantage Mortgage™ program or a USDA Section 502 Loan. HOME- funded SHLP loans are used to compliment funds from Habitat for Humanity or other sources.

HTF funds that helps finance loans for NCHFA's RPP program are used in conjunction with Low Income Housing Tax Credits, state-appropriated Workforce Housing Loan Program funds, and other private and local funding. LIHTC developments leverage private, state and local funds to build and rehabilitate rental housing.

ESG funding is a dollar- for dollar- match. Local non-profits and units of government can use cash, non-cash (in-kind), donated value of a building/materials and or volunteer hours to match ESG funding. ESG match is provided at the recipient level.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

N/A

Discussion

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
North Carolina Housing Finance Agency	Government	Non-homeless special needs Ownership Rental	State
NC Commerce	Government	Economic Development Homelessness Non-homeless special needs Planning neighborhood improvements public facilities public services	State
NC Department of Health and Human Services	Government	Homelessness Non-homeless special needs Rental	State

Table 56 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The strength of the Emergency Solutions Grants delivery system is that it allows a broad range of providers to deliver services for the homeless or persons at risk of homelessness. In doing so, persons are often able to access services through multiple non-profits and local units of government that span North Carolina.

A gap in the Emergency Solutions Grants Program service delivery is limited funding. Providers must choose which services they may offer to homeless or persons at risk of homelessness and other special populations.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	X
Mortgage Assistance	X	X	X
Rental Assistance	X	X	X
Utilities Assistance	X	X	
Street Outreach Services			
Law Enforcement	X	X	X
Mobile Clinics	X	X	X
Other Street Outreach Services	X	X	X
Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care	X	X	X
Education	X	X	X
Employment and Employment Training	X	X	X
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	X
Other			
	X	X	X

Table 57 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

The state of NC has a vast network of services that begin with the ESG services that are available throughout North Carolina. Each program offers an array of services in local communities that provide homelessness prevention, street outreach and supportive services. Service provision of these programs may include, but are not limited to, health, mental health, employment services for homeless persons, chronically homeless individuals and families, families with children, veterans and their families, unaccompanied youth and people with HIV/AIDS.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

The strength of the Emergency Solutions Grants delivery system is that it allows a broad range of providers to deliver services for the homeless or persons at risk of homelessness. In doing so, persons are often able to access services through multiple non-profits and local units of government that span North Carolina.

A gap in the Emergency Solutions Grants Program service delivery is limited funding. Providers must choose which services they may offer to homeless or persons at risk of homelessness and other special populations.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

The North Carolina Department of Commerce, the CDBG Program provides grants to non-entitlement local governments for projects that enhance the viability of communities by providing decent housing and suitable living environments and by expanding economic opportunities, principally for people of low- and moderate-income. The state will continue to solicit feedback to determine where gaps are in providing CDBG funding opportunities to local units of government and design programs that help fill those gaps. This past year there was an increase in CDBG NR funds from economic development allocation that were reallocated to other neighborhood activities.

The state leverages funding through Consolidated Planning Programs like ESG, HOME and HTF and the most recent Recovery Housing Program (RHP) to further the impact of programs to assist with drug abuse and housing related issues. Local providers are also encouraged to foster opportunities to leverage by requesting funding from local units of government and other non-HUD grant opportunities

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Homeowner Housing Rehabilitation	2026	2030	Affordable Housing		Housing for households under 30% AMI Housing for non-homeless persons / special needs Housing for households under 31-60% AMI Housing for households under 61-80% AMI Housing for the homeless individuals Neighborhood Revitalization Hurricane Helene Recovery Non-Housing Community Development	HOME: \$5,739,860	Homeowner Housing Rehabilitated: 600 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Affordable Homeownership	2026	2030	Affordable Housing		Housing for households under 30% AMI Housing for non-homeless persons / special needs Housing for households under 31-60% AMI Housing for households under 61-80% AMI Housing for the homeless individuals Neighborhood Revitalization Hurricane Helene Recovery Non-Housing Community Development	HOME: \$9,183,776	Direct Financial Assistance to Homebuyers: 1200 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Affordable Rental Housing Development	2026	2030	Affordable Housing		Housing for households under 30% AMI Housing for non-homeless persons / special needs Housing for households under 61-80% AMI Housing for the homeless individuals Neighborhood Revitalization Hurricane Helene Recovery Non-Housing Community Development	HOME: \$3,443,916 HTF: \$4,421,012	Rental units constructed: 250 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Affordable Rental Housing Rehabilitation	2026	2030	Affordable Housing		Housing for households under 30% AMI Housing for non-homeless persons / special needs Housing for households under 31-60% AMI Housing for households under 61-80% AMI Housing for the homeless individuals Neighborhood Revitalization Hurricane Helene Recovery Non-Housing Community Development	HOME: \$2,295,944	Rental units rehabilitated: 50 Household Housing Unit
5	ESG Housing Stability	2026	2030	Homeless		Housing for households under 30% AMI Housing for households under 31-60% AMI Housing for the homeless individuals Hurricane Helene Recovery Non-Housing Community Development	ESG: \$15,379,090	Direct Financial Assistance to Homebuyers: 1500 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	ESG Crisis Response	2026	2030	Homeless		Housing for households under 30% AMI Housing for households under 31-60% AMI Housing for the homeless individuals Hurricane Helene Recovery Non-Housing Community Development	ESG: \$10,252,720	Direct Financial Assistance to Homebuyers: 1500 Households Assisted Homeless Person Overnight Shelter: 48000 Persons Assisted

Table 58 – Goals Summary

Goal Descriptions

1	Goal Name	Homeowner Housing Rehabilitation
	Goal Description	HOME funds are used for the rehabilitation or reconstruction of existing housing units. Rehabilitation investments help low-income veterans, seniors, children threatened by lead hazards and people living with disabilities remain in their homes. The Essential Single-Family Rehabilitation Loan Pool (ESFRLP) provides forgivable loans (grants for soft costs and administration) to home owners through regional agencies, units of local government, and nonprofit organizations. Funds are disbursed on a unit-by-unit basis with a first-come, first-approved “limited pool” to reimburse soft cost expenses for assisted units that do not meet the SFRLP (Essential) rehabilitation standard due to no fault of the Member (i.e., homeowner dies before rehabilitation has started). SFRLP (Essential) funds target owner householders below 80% of area median income with elderly, disabled and/or Veteran, fulltime household members or with a child under 6 years old frequently present in a home with lead hazards. Households across the state are eligible to apply with the exception of the five CDBG large entitlements (Durham, Charlotte, Greensboro, Raleigh, and Winston-Salem).

2	Goal Name	Affordable Homeownership
	Goal Description	Enable households to afford homes through North Carolina Housing Finance Agency's Homeownership programs, such as the Community Partners Loan Pool and the Self-Help Loan Pool
3	Goal Name	Affordable Rental Housing Development
	Goal Description	Finance the development of affordable rental units through the North Carolina Housing Finance Agency's Rental Production Program or other rental programs. If operating costs and/or reserves are indicated in underwriting or for continued financial viability of a development funded wholly or in part with national HTF, then these funds may also be provided for this use.
4	Goal Name	Affordable Rental Housing Rehabilitation
	Goal Description	Finance the rehabilitation of affordable rental units through the North Carolina Housing Finance Agency's Rental Production Program or other rental programs. If operating costs and/or reserves are indicated in underwriting or for continued financial viability of a development funded wholly or in part with national HTF, then these funds may also be provided for this use.
5	Goal Name	ESG Housing Stability
	Goal Description	ESG Housing Stability: ESG is administered by the NC Department of Health and Human Services (NC DHHS). Through its Housing Stability activity, NC DHHS serves homeless populations through Rapid Rehousing and Homelessness Prevention initiatives.
6	Goal Name	ESG Crisis Response
	Goal Description	ESG Crisis Response is administered by NC Department of Health and Human Services (NC DHHS) and provides temporary, emergency housing, and outreach to unsheltered homeless populations. Goal outcome indicators include shelter and street outreach (i.e., identified as "other" below).

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

Based on data from previous years, anticipated allocations, anticipated market, construction and other cost changes, HOME funding will assist approximately 2,100 low-income households (<80% AMI) including an anticipated 420 very low-income households (<50% AMI), and an anticipated 120 extremely low-income households (<30% AMI).

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

Activities to Increase Resident Involvements

Is the public housing agency designated as troubled under 24 CFR part 902?

Plan to remove the ‘troubled’ designation

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

Program design efforts, research, and data and policy analysis from Consolidated Planning partners and other North Carolina stakeholders provide insight into how land use, planning, and other public policies affect the development of affordable housing. While statewide laws can present opportunities or barriers to affordable housing (e.g., the North Carolina State Fair Housing Act prohibits discrimination in the siting of residential developments containing affordable housing), local governments in North Carolina have primary control over land use and develop their own zoning and development guidelines in accordance with state law. These local policies can promote more affordable housing with strategies ranging from more permissive zoning or streamlined permitting processes to local gap financing or selling/leasing public land. In addition to policies impacting housing supply, ensuring and increasing access to existing opportunities such as Housing Choice Vouchers and rental assistance can also lower barriers to affordable housing.

Other land use, planning, and programmatic policies can discourage affordable housing development and are described in greater detail below:

- High costs to develop and maintain affordable housing: The costs to develop affordable housing have significantly increased in recent years, driven by rising construction costs, land prices, interest rates, and operating costs. These increases drive up the costs to own a home and both to develop and operate affordable housing. For example, according to data from the Federal Reserve Bank of St. Louis, the cost of single-family and multifamily construction materials increased by 34% and 35%, respectively from January 2020 to January 2025. In addition, developers and residents of affordable housing have seen increases in local permits and impact fees, operating costs, insurance, and local property taxes in recent years.

Insufficient funding for affordable housing:

The expectations of affordable housing to offer long-term affordability and to comply with a range of funding, as well as permitting and zoning, requirements can result in higher costs to develop and maintain affordable housing. Local, state, and federal funding has been able to keep pace with these rising costs, which has resulting in fewer affordable homes being created per dollar in public funding.

Zoning ordinances: In many communities, much of the developable land is zoned exclusively for single-family use, making affordable rental property development challenging. Even when projects receive variances, navigating the approval and appeal process can add substantial—and at times prohibitive—time and costs to the project.

Expensive or lengthy local permit and/or approval processes: Developers of affordable housing often face substantial fees for permits and impact fees, and have to navigate lengthy review processes, which can extend project timelines and add costs to the project.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

This section of the plan explains whether the cost of housing or the incentives to develop, maintain, or improve affordable housing in the State are affected by its policies, including tax policies affecting land and other property, land use controls, zoning ordinances, building codes, fees and charges, growth limits, and policies that affect the return on residential investment. These issues are presented based on programmatic experience, previous analyses.

Public policies related to the cost of housing and incentives to develop, preserve or rehabilitate affordable housing vary throughout the state. In North Carolina, counties and cities develop their own land use, zoning, and development guidelines in accordance with state law. Various counties and municipalities across the state have implemented policies to promote more affordable housing from more permissive zoning to more streamlined permitting processes. In addition to policies impacting housing supply, ensuring and increasing access to existing opportunities such as Housing Choice Vouchers and rental assistance can also lower barriers to affordable housing.

The process of involving the examination of the laws and regulations that impact the construction of affordable housing as well as a review of industry practices and conditions. Previous analysis highlighted patterns in mortgage lending, discrimination in the housing market, and policies and practices of individuals and businesses in the housing market.

In sum, housing affordability and availability are the most dominant housing problems experienced by households in NC. This is evident from the demands for emergency shelters, waiting lists for public and assisted housing, low vacancy rates, the Point-In-Time counts across the states, and calls to social service providers and agencies for assistance. As an example, nearly 69% of NC state HOPWA households earning less than the median income pay more than 30% of their income for housing which means that they are extremely cost-burdened. Local tax rates are becoming significantly higher, especially in the urban areas of the state. Residents and advocates are exploring funding and legislative options to offset higher taxes, to keep housing affordable to LMI households. Also, the cost of building materials and labor has increased due to limited access and production of supplies caused by delays due to the pandemic and NC natural disasters. The NC Plan Partners will continue to review the HUD regulatory barrier clearinghouse to identify and establish strategies to remove barriers to affordable housing during the Annual Action Plan development process.

SP-60 Homelessness Strategy – 91.215(d)

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs.

ESG provides Street Outreach services to people experiencing homelessness, including those who are unsheltered. Street outreach includes engagement, case management, emergency health services, emergency mental health services, transportation, and services for special populations including homeless youth, and homeless persons with HIV/AIDS. Street outreach providers locate, identify, and build relationships with unsheltered homeless people to provide immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs.

Addressing the emergency and transitional housing needs of homeless persons

All the NC Plan Partners have programs that address homeless housing needs.

The CDBG Neighborhood Revitalization programs is a competitive program, but allows funding for emergency shelter and transitional housing needs of homeless people. The recovery housing program is a venue that helps to foster the homeless to work pipeline through the recovery housing program.

In conjunction with the Low-Income Housing Tax Credit and state funds, NCHFA utilizes HOME and HTF to create and preserve affordable rental units. Properties receiving tax credits are required to participate in the Targeting Program, which sets aside between 10% and 20% of units for people with disabilities. NCHFA also offers the Supportive Housing Development Program to help nonprofit organizations and local governments build and rehabilitate emergency and permanent housing for people who are experiencing homelessness or have disabilities or other special needs such as substance use recovery. NCHFA partners with DHHS to provide integrated permanent supportive housing options to North Carolinians across state through the Transitions to Community Living Voucher, the Targeting Program and Key Rental Assistance.

Through ESG, NC DHHS provides emergency shelter operations funding to meet the emergency housing needs of homeless persons. This includes day shelters, mass shelters, and hotel/motel vouchers when no other appropriate shelter is available. ESG also provides shelter services funding for shelter residents to receive essential services such as case management, childcare, education, employment, and life skills services, legal services, mental health and substance abuse services, transportation, and services for special populations. These services are provided to homeless individuals and families to get them housed as quickly as possible while also connecting them to mainstream services that will assist them in obtaining and maintaining their housing.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

ESG provides case management services under all programs (street outreach, shelter, rapid rehousing, homelessness prevention) to shorten the period of time that individuals and families experience homelessness and to prevent those recently homeless from becoming homeless again. These services are available to all homeless populations including chronically homeless individuals and families, families with children, veterans, and unaccompanied youth. Each continuum of care in the state sets their service priorities to serve and house the most vulnerable first. Many communities have prioritized families, those that are chronically homeless, veterans, and unaccompanied youth

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

ESG does not have an income limit for its street outreach, shelter, or rapid rehousing services. However, communities can prioritize their services to those who are most vulnerable. This often includes those with low, very low, or no income. ESG homelessness prevention services are only available to those who are at or below 30% area median income (AMI).

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

CDBG: The CDBG Neighborhood Revitalization Program which focuses on housing preservation and development also has lead-based paint policies in place. CDBG-NR enforces the 24 CFR 35 lead paint standards. Additionally, CDBG-NR allows the funding to be used to address LBP hazards as part of rehabilitation for multifamily developments and homeowner-occupied dwellings. During monitoring, staff inspect the property, checks for the LBP assessment, and, if lead was present, verifies a clearance report was prepared.

ESG: Lead-based paint policies are in effect for subrecipients utilizing NC ESG funds. Subrecipients must follow HUD’s lead-based paint guidelines and conduct visual assessments on properties as required. ESG funds cannot be utilized on units that do not pass lead-based paint assessments.

HOME: Lead-based paint policies in effect for program utilizing HOME funds. The North Carolina Housing Finance Agency operates a number of home rehabilitation programs that adhere to the 24 CFR 35 lead paint standards. Additionally, several programs provide forgivable loans to low-income homeowners for emergency repairs to correct safety hazards that pose an imminent threat to the safety of the household, including lead hazards.

The Agency will continue to participate quarterly in an ad hoc lead hazards advisory group made up of concerned individuals from the public health, environmental protection, affordable housing, and occupational safety sector.

HOPWA: The HOPWA program requires that each project sponsor providing TBRA services comply with HOPWA lead-based paint regulations which includes:

- Provision of HUD’s “Protect Your Family from Lead In The Home” pamphlet
- Disclosure notice to occupants: The property owner or lessor of the property is required to disclose the presence of known lead-based paint in the unit to be leased
- Visual assessment: Regulations require that a visual assessment of existing paint surfaces in dwellings constructed before 1978 be included in the HQS inspections before a unit is leased. An on-line training in visual assessment is available and should be completed by project staff.
- Paint stabilization: If a visual assessment reveals problem with paint services, the property owner should undertake paint stabilization before the start of a lease.
- Ongoing lead-based paint maintenance: A visual assessment of the stability of painted services should be conducted as part of the annual recertification and HQS process
- Response to a child with elevated blood lead levels: When a child under the age of 6 living in a HOPWA leased unit is found to have elevated blood levels, a response process must be followed

During project sponsor sub-recipient monitoring site visits, NC HOPWA staff will look for documentation that households received HUD's lead based paint pamphlet, that the landlord disclosed any known lead hazards, that a visual assessment of paint stability was completed prior to occupancy, that paint stabilization was undertaken if necessary, that visual assessments are completed upon recertification, and when necessary there was a proper response to elevated lead levels in children under the age of six.

How are the actions listed above related to the extent of lead poisoning and hazards?

CDBG: The CDBG Neighborhood Revitalization Program which focuses on housing preservation and development also has lead-based paint policies in place. CDBG-NR enforces the 24 CFR 35 lead paint standards. Additionally, CDBG-NR allows the funding to be used to address LBP hazards as part of rehabilitation for multifamily developments and homeowner-occupied dwellings. During monitoring, staff inspect the property, checks for the LBP assessment, and, if lead was present, verifies a clearance report was prepared.

ESG: Lead-based paint policies are in effect for subrecipients utilizing NC ESG funds. Subrecipients must follow HUD's lead-based paint guidelines and conduct visual assessments on properties as required. ESG funds cannot be utilized on units that do not pass lead-based paint assessments.

HOME: Lead-based paint policies in effect for program utilizing HOME funds. The North Carolina Housing Finance Agency operates a number of home rehabilitation programs that adhere to the 24 CFR 35 lead paint standards. Additionally, several programs provide forgivable loans to low-income homeowners for emergency repairs to correct safety hazards that pose an imminent threat to the safety of the household, including lead hazards.

The Agency will continue to participate quarterly in an ad hoc lead hazards advisory group made up of concerned individuals from the public health, environmental protection, affordable housing, and occupational safety sector.

HOPWA: The HOPWA program requires that each project sponsor providing TBRA services comply with HOPWA lead-based paint regulations which includes:

- Provision of HUD's "Protect Your Family from Lead In The Home" pamphlet
- Disclosure notice to occupants: The property owner or lessor of the property is required to disclose the presence of known lead-based paint in the unit to be leased
- Visual assessment: Regulations require that a visual assessment of existing paint surfaces in dwellings constructed before 1978 be included in the HQS inspections before a unit is leased. An on-line training in visual assessment is available and should be completed by project staff.

- Paint stabilization: If a visual assessment reveals problem with paint services, the property owner should undertake paint stabilization before the start of a lease.
- Ongoing lead-based paint maintenance: A visual assessment of the stability of painted services should be conducted as part of the annual recertification and HQS process
- Response to a child with elevated blood lead levels: When a child under the age of 6 living in a HOPWA leased unit is found to have elevated blood levels, a response process must be followed

During project sponsor sub-recipient monitoring site visits, NC HOPWA staff will look for documentation that households received HUD's lead based paint pamphlet, that the landlord disclosed any known lead hazards, that a visual assessment of paint stability was completed prior to occupancy, that paint stabilization was undertaken if necessary, that visual assessments are completed upon recertification, and when necessary there was a proper response to elevated lead levels in children under the age of six.

How are the actions listed above integrated into housing policies and procedures?

This information has been discussed in several sections of this plan as it deals with lead-based paint and its hazards. Pamphlets are given out to most households to make sure the recipient of CDBG, and other federal dollars are aware of the hazards of lead-based paint.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan.

The HOME, NHTF and CDBG and CDBG- CV, RHP) programs address the needs of extremely low, very-low and moderate income families and households across the state.

HOME: The HOME Program serves very low and low-income household providing assistance for homeownership, financing for rental development and funds for essential rehabilitation. The Agency's homeownership program allows low-income borrowers to purchase a home which in turn creates a pathway to economic stability and generational wealth building. Rental development efforts result in the creation of more units available at rents affordable to extremely low and very low-income households. Living in an affordable apartment reduces cost burden and allows renters to divert funds toward other essential expenses. The rehabilitation of single-family homes ensures individuals and families can remain in their homes, avoiding costly medical care.

National Housing Trust Fund: NHTF provides funding for the production and preservation of affordable rental housing for extremely low-income households and persons with disabilities.

CDBG: The NC Department of Commerce, through CDBG programs, believes that the true eradication of poverty means providing a holistic approach to community development. The CDBG-eligible activities are designed within the framework that allows grantees to address housing, infrastructure, economic, human capital, and all other community development needs. CDBG funds are granted to local governments for various types of infrastructure improvements to assist with business expansion or retention. A local funding match is required for every CDBG dollar except in the 25 most distressed counties ranked by the Department of Commerce for the NC Tier System. This helps impact poverty in the most distressed counties of the state.

SP-80 Monitoring – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

Each of the Consolidated Plan Partners as well as the new Division of Community Revitalization who administer a HUD program has developed standards and procedures for monitoring and ensuring compliance. Activities are monitored through site visits, file-reviews, and reporting on federal and state regulations (e.g., Davis-Bacon, Section 3, Fair Housing, etc.) These activities ensure that recipients of program funds are carrying out the objectives of each respective program as described in the five-year Consolidated Plan and annual action plans.

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	46,417,547.00	0.00	0.00	46,417,547.00	230,000,000.00	NC Commerce receives CDBG funds for non-entitlement areas. The funds and program income are used primarily for economic development, housing rehabilitation and development support, public facilities, and infrastructure.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	13,159,440.23	9,800,000.00	0.00	22,959,440.23	73,400,000.00	NCHFA uses HOME funds and any program income to promote the production, ownership and rehabilitation of housing.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	5,441,502.00	0.00	0.00	5,441,502.00	0.00	NC DHHS administers HOPWA funding which assists with housing needs for persons with AIDS and HIV.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	5,126,360.00	0.00	0.00	5,126,360.00	20,505,440.00	ESG funding is administered by NC DHHS and supports housing stabilization and emergency shelter activities.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HTF	public - federal	Acquisition Admin and Planning Homebuyer assistance Multifamily rental new construction Multifamily rental rehab New construction for ownership	4,000,000.00	200,000.00	0.00	4,200,000.00	19,600,000.00	NCHFA uses HTF funds for the development and rehabilitation of multifamily rental housing, including operating reserves.

Table 59 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The North Carolina General Assembly provides \$3M for HOME Match as a recurring appropriation. Additional match, if needed is secured through bond financing and excess HOME Match. HOME provides crucial support for multiple statewide housing programs, ranging from rental financing to home buyer assistance to home rehabilitation. HOME funds used to finance rental development are leveraged in conjunction with Low-Income Housing Tax Credits, state appropriations, as well as private and local funds. HOME funds used for homeownership provide shared mortgage financing used in conjunction with other Agency loan products and funds from nonprofits.

HOME funds that help finance loans for NCHFA's RPP program are used in conjunction with Low Income Housing Tax Credits, state-appropriated

Workforce Housing Loan Program funds, and other private and local funding. LIHTC developments leverage private, state and local funds to build and rehabilitate rental housing. In NCHFA's CPLP program, HOME funds finance second mortgages that are combined with NCHFA's NC Home Advantage Mortgage™ program or a USDA Section 502 Loan. HOME- funded SHLP loans are used to compliment funds from Habitat for Humanity or other sources.

HTF funds that helps finance loans for NCHFA's RPP program are used in conjunction with Low Income Housing Tax Credits, state-appropriated Workforce Housing Loan Program funds, and other private and local funding. LIHTC developments leverage private, state and local funds to build and rehabilitate rental housing.

ESG funding is a dollar- for dollar- match. Local non-profits and units of government can use cash, non-cash (in-kind), donated value of a building/materials and or volunteer hours to match ESG funding. ESG match is provided at the recipient level.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

N/A

Discussion

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Homeowner Housing Rehabilitation	2026	2030	Affordable Housing		Housing for households under 30% AMI Housing for households under 31-60% AMI Housing for households under 61-80% AMI	HOME: \$5,739,860.00	Homeowner Housing Rehabilitated: 120 Household Housing Unit
2	Affordable Homeownership	2026	2030	Affordable Housing		Housing for households under 30% AMI Housing for households under 31-60% AMI Housing for households under 61-80% AMI	HOME: \$9,183,776.00	Direct Financial Assistance to Homebuyers: 240 Households Assisted
3	Affordable Rental Housing Development	2026	2030	Affordable Housing		Housing for households under 30% AMI Housing for non-homeless persons / special needs Housing for households under 31-60% AMI Housing for households under 61-80% AMI	HOME: \$3,443,916.00 HTF: \$4,421,013.00	Rental units constructed: 50 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Affordable Rental Housing Rehabilitation	2026	2030	Affordable Housing		Housing for households under 30% AMI Housing for non-homeless persons / special needs Housing for households under 31-60% AMI Housing for households under 61-80% AMI	HOME: \$2,295,944.00	Rental units rehabilitated: 10 Household Housing Unit
5	ESG Housing Stability	2026	2030	Homeless		Housing for households under 30% AMI	ESG: \$8,456,890.00	Tenant-based rental assistance / Rapid Rehousing: 17102 Households Assisted Homeless Person Overnight Shelter: 14010 Persons Assisted Homelessness Prevention: 4195 Persons Assisted
6	ESG Crisis Response	2026	2030	Homeless			ESG: \$679,000.00	Other: 8989215 Other

Table 60 – Goals Summary

Goal Descriptions

1	Goal Name	Homeowner Housing Rehabilitation
	Goal Description	Provide financing for the rehabilitation, repair and accessibility modifications of substandard owner-occupied housing. Repair and rehabilitation programs serve owner households with low-income, elderly, disabled and/or Veteran, fulltime household members or with a child under 6 years old frequently present in a home with lead hazards.
2	Goal Name	Affordable Homeownership
	Goal Description	Provides financing to help low- to moderate-income buyers through local governments and nonprofit organizations that participate in our Community Partners Loan Pool (CPLP) and Self-Help Loan Pool (SHLP) programs. Partners use funding to make home ownership more affordable and sustainable with down payment assistance, shared mortgage financing and energy efficiency subsidies.
3	Goal Name	Affordable Rental Housing Development
	Goal Description	Finance the development of affordable rental units through the North Carolina Housing Finance Agency's rental programs including the Renal Production Program (RPP) or other rental programs. If operating costs and/or reserves are indicated in underwriting or for continued financial viability of a development funded wholly or in part with HTF, then these funds may be provided for this use.
4	Goal Name	Affordable Rental Housing Rehabilitation
	Goal Description	Finance the rehabilitation of affordable rental units through the North Carolina Housing Finance Agency's rental programs including the Renal Production Program (RPP) or other rental programs. If operating costs and/or reserves are indicated in underwriting or for continued financial viability of a development funded wholly or in part with HTF, then these funds may be provided for this use.
5	Goal Name	ESG Housing Stability
	Goal Description	
6	Goal Name	ESG Crisis Response
	Goal Description	

Projects

AP-35 Projects – 91.220(d)

Introduction

Projects

#	Project Name

Table 61 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

AP-38 Project Summary

Project Summary Information

Project Name	Target Area	Goals Supported	Needs Addressed	Funding	Description	Target Date	Est nu of f wil the act
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AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

HOME: HOME funds are distributed statewide, with an emphasis on geographic coverage in each program. Rental development and preservation programs permit HOME funds in developments in all 100 counties. All geographies in North Carolina are eligible for the Single-Family Rehabilitation Loan Pool program with the exception of the five CDBG large entitlements (Durham, Charlotte, Greensboro, Raleigh, and Winston-Salem). Counties are funded in a three-year rotation, so each year provides new multi-year funding for a third of the state. For HOME funded affordable homeownership, all counties in the state are eligible geographies, provided that there is a partner able to serve the county. HOME Match funds also can be distributed statewide following NC Session Law 2005-276.

HTF: Under the Rental Production Program, rental developments may use HTF in all counties, consistent with the state's Qualified Allocation Plan. For rehabilitation of rental housing, the intent is to serve the state as a whole and funds can assist eligible projects anywhere in North Carolina, with priority given to lower income counties.

Geographic Distribution

Target Area	Percentage of Funds

Table 62 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

HOME: The preference is for HOME dollars to serve the entire state. Homeowner rehabilitation makes an exception for the larger entitlement jurisdictions in the state that receive a large HOME Allocation directly from HUD.

HTF: HTF can be used in all areas of the state. Programs may make priorities for certain county conditions.

Discussion

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	0
Special-Needs	0
Total	0

Table 64 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	0
Acquisition of Existing Units	0
Total	0

Table 65 - One Year Goals for Affordable Housing by Support Type

Discussion

For HOME and HTF, an estimated 50 new units will be produced, 130 units will be rehabilitated, and 240 units will be acquired through homeownership.

AP-60 Public Housing – 91.220(h)

Introduction

Actions planned during the next year to address the needs to public housing

Actions to encourage public housing residents to become more involved in management and participate in homeownership

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

Discussion

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

Administered by the North Carolina Department of Commerce, Rural Economic Development Division (REDD) the CDBG Program provides grants to non-entitlement local governments for projects that enhance the viability of communities by providing decent housing and suitable living environments and by expanding economic opportunities, principally for persons of low and moderate income. The state will continue to solicit feedback to determine where gaps are in providing CDBG funding opportunities to local units of government and design programs that help fill some to those gaps.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The State of NC has 12 CoC's and will continue in this next year to reach out to individuals through its network of various churches and other agencies to aid in the distribution of material and support services for our homeless population.

Addressing the emergency shelter and transitional housing needs of homeless persons

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services,

employment, education, or youth needs

Discussion

AP-70 HOPWA Goals - 91.220 (I)(3)

One year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	398,021
Tenant-based rental assistance	1,259,158
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	169,541
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	0
Total	1,826,720

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

Discussion:

This topic takes on its own narrative in many parts of the State of NC. Public policies related to the cost of housing and incentives to develop, preserve, or rehabilitate affordable housing vary widely. North Carolina and its many counties and cities develop their own land use, zoning, and development guidelines in accordance with state law. Many counties and jurisdictions across the state have implemented policies to promote more affordable housing from more permissive zoning to more streamlined permitting processes. In addition to policies impacting housing supply, ensuring and increasing access to existing opportunities. Many downpayment assistance programs exist throughout the state but affordability is still an issue. Many affordable units are not welcome in a vast number of neighborhoods because of the view that these new housing units at a lower price point could bring down property values therefore infill housing seems to be a better option in some towns.

AP-85 Other Actions – 91.220(k)

Introduction:

HOME: HOME is a federal block grant specifically designed exclusively to increase the number of low-income households served with safe and quality affordable housing for low-income households and to expand the long-term supply of affordable housing.

HTF: HTF is designed to increase and preserve the supply of rental housing for extremely low-income households. HTF will reduce the housing costs of extremely low-income families and improve the resources available to meet other consumer needs. A portion of HTF can be used to increase homeownership for extremely low-income households.

Actions planned to address obstacles to meeting underserved needs

Actions planned to foster and maintain affordable housing

Actions planned to reduce lead-based paint hazards

Actions planned to reduce the number of poverty-level families

Actions planned to develop institutional structure

Actions planned to enhance coordination between public and private housing and social service agencies

Discussion:

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
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2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	90.00%

HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

To conduct housing-related activities, NCHFA uses nonfederal funds, federal funds and the private market. The nonfederal sources offer the NCFHA even more opportunities and flexibility to serve all

priority categories. The available funding sources include the North Carolina Housing Trust Fund; state-appropriated HOME Match, the NC Workforce Housing Loan Program, the Low-Income Housing Tax Credit Program, and bond financing.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

Homebuyer loan subsidies (except for the Self-Help Loan Pool) will be provided as subordinate deferred-payment loans that are not forgiven. Homebuyer loans under the Self-Help Loan Pool will be provided as principal-only amortizing loans. Loans under all home buyer programs can be called (1) when the property is sold, (2) when the property is no longer the home buyer's principal residence, (3) at the end of the loan term, or (4) when the first mortgage is refinanced. If the net proceeds of the sale of the property are insufficient to repay the home buyer loans in full, the Agency will accept its pro rata share of the net proceeds in full satisfaction of the loan. However, exceptions may be granted and assumptions may be allowed for an income-qualified heir or lineal descendant that will reside in the home as a principal residence.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

Homebuyer programs funded with HOME follow recapture requirements and ensure that the State recoups all or a portion of the HOME assistance to the homebuyers. As stated in number 2 above, home buyer loan subsidies except for the Self-Help Loan pool will be provided as subordinate deferred-payment loans that are not forgiven. Homebuyer loans under the Self-Help Loan Pool will be provided as principal-only amortizing loans. Loans under all home buyer programs can be called (1) when the property is sold, (2) when the property is no longer the home buyer's principal residence, (3) at the end of the loan term, or (4) when the first mortgage is refinanced. If the net proceeds of the sale of the property are insufficient to repay the home buyer loans in full, the Agency will accept its pro rata share of the net proceeds in full satisfaction of the loan. However, exceptions may be granted and assumptions may be allowed for an income-qualified heir or lineal descendant that will reside in the home as a principal residence

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

With the exception of the RPLP program HOME funds are not used for refinancing of existing debt, even in developments rehabilitated with HOME funds. For RPLP, NCHFA may determine that

refinancing of senior debt is necessary for the fiscal fitness of the property. In no event will the pro-rated portion of the refinance proceeds (refinance funds/total debt on the property at the time of application) exceed the pro-rated portion of the rehabilitation costs (rehabilitation costs/total value of the property at the time of application).

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

N/A

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

N/A

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

N/A

**Emergency Solutions Grant (ESG)
Reference 91.220(l)(4)**

1. Include written standards for providing ESG assistance (may include as attachment)
2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.
3. Identify the process for making sub-awards and describe how the ESG allocation is available to private nonprofit organizations (including community and faith-based organizations).

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

5. Describe performance standards for evaluating ESG.

Housing Trust Fund (HTF)

1. How will the grantee distribute its HTF funds? Select all that apply:

Applications submitted by eligible recipients

2. If distributing HTF funds through grants to subgrantees, describe the method for distributing HTF funds through grants to subgrantees and how those funds will be made available to state agencies and/or units of general local government. If not distributing funds through grants to subgrantees, enter "N/A".

N/A

3. If distributing HTF funds by selecting applications submitted by eligible recipients,
 - a. Describe the eligibility requirements for recipients of HTF funds (as defined in 24 CFR Â§ 93.2). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

The State will primarily distribute its HTF funds to eligible applicants through NCHFA's rental development and rehabilitation programs, including the Rental Production Program (RPP) and Rental Preservation Loan Program (RPLP), which provide long-term financing for the construction of new, affordable rental housing projects, for the rehabilitation of affordable rental housing, and for related permissible activity. The State will not distribute any HTF funds through subgrantees. The State will require that all recipient applications contain a description of the eligible activities to be conducted with HTF funds and that each eligible recipient certify that housing assisted with HTF funds will comply with HTF requirements. The state may also distribute HTF funds through the Supportive Housing Development Program (SHDP) which seeks to increase and maintain permanent supportive housing in the most integrated setting appropriate for adults and children with special needs below 50% AMI. SHDP

HTF-funded housing would be limited to serving households at or below 30% AMI.

-
- b. Describe the grantee's application requirements for eligible recipients to apply for HTF funds. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

For RPP, NCHFA will use the application process and eligibility requirements described in North Carolina's Qualified Allocation Plan (QAP) in awarding HTF funds (available online). The QAP details applicant eligibility, eligible activities, what applications must include, when and where applications are to be submitted, the criteria by which applications will be evaluated, who will review applications, and when awards are to be made. Awards through RPP may include funds for rehabilitation, acquisition, refinancing, or operating reserves/assistance.

For RPLP, NCHFA will use an application plan and selection criteria as detailed below. Awards through RPLP may include funds for rehabilitation, acquisition, refinancing, or operating reserves or assistance.

For SHDP, NCHFA will use an application plan and selection criteria as detailed below. Awards through SHDP may include funds for rehabilitation, acquisition, new construction, or operating reserves or assistance of eligible developments serving individuals with special needs.

-
- c. Describe the selection criteria that the grantee will use to select applications submitted by eligible recipients. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

RPP selection criteria are designed to identify the best applications based on site, market, rent affordability, development costs, project team, design and construction, energy efficiency, efficient use of tax credits, units for mobility-impaired individuals and ability to achieve community integration under to North Carolina's 2012 Olmstead settlement agreement with the U.S. Department of Justice. Appendix J of the QAP outlines the additional criteria for those tax credit applications requesting HTF funds.

https://www.nchfa.com/sites/default/files/page_attachments/QAP24-FinalQAP.pdf

RPLP loans are to be awarded using selection criteria that may include the following criteria:

- Need for rehabilitation for critical building components and health and safety needs
- Projects must have an owner in good standing with NCHFA
- Project Contractors, borrowers, developers and their subcontractors, or subsequent recipients must be in good standing with the federal and state government
- Applicant must have successfully owned and operated multifamily rental housing for a minimum of three years with no material or uncorrected

noncompliance issues unless there is a plan of action to address the issue(s) that has been accepted by the Agency.

- Applicant must have sound business practices as well as financial structure and viability
- Experience, including performance history, of development team and management agent(s)
- Ability to serve the lowest-income households, specifically those at or below 30% of AMI
- County income designation – priority will be given to projects in lower income counties
- Priority for applicants using below market loans or construction loans.

For more information, visit <https://www.nchfa.com/rental-housing-partners/rental-preservation-partners>

SHDP loans are to be awarded according to the criteria and methods described in the SHDP Program Cycle Applications Guidelines and Instructions.

https://www.nchfa.com/sites/default/files/page_attachments/SHDPProgramGuidelines.pdf. These include that a site meets minimum site standards, and scoring based on the following categories:

- Project location and site suitability
- Housing development and organizational capacity
- Financial structure and project readiness
- Ability to serve the lowest-income tenants and persons with disabilities

-
- a. Describe the grantee's required priority for funding based on geographic diversity (as defined by the grantee in the consolidated plan). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

For RPP, NCHFA portions its LIHTC new construction awards across the state's regions promoting geographic distribution. Additionally, the Agency avoids concentrations of awards in singular areas of the state. Furthermore, following North Carolina's 2012 Olmstead settlement agreement with the U.S. DOJ, the 2025 QAP includes competitive points for the "Olmstead settlement Initiative" that, in part, are awarded based on geographic NCDHHS priority counties.

For RPLP, NCHFA prioritizes applications that serve low-income counties, followed by moderate-income counties and then high-income counties. County income categorization is based on HUD's median family income.

-
- b. Describe the grantee's required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Grantees (i.e., the State) must "commit" their HTF within two years, and expend within five years. All tax credit projects have a strict window for completion and

must be placed in service by December 31 two years after the award of credits. For example, applications awarded tax credits in 2026 must be placed in service no later than December 31, 2028. There is also a requirement for projects to expend ten percent of the costs within 12 months of allocation. Using HTF with tax credits ensures that all projects will adhere to the requirement to obligate the funds and undertake eligible activities within 12 months. Appendix J of the QAP further states the ability to obligate funds and undertake activities in a timely manner will be a threshold requirement for HTF approval. NCHFA will request a timeline as part of the application for projects requesting HTF funds to verify the applicant's ability to meet all deadlines. RPLP projects must adhere to funding source requirements and regulations and are required to timely report and update NCHFA on project progress. The RPLP program may further prioritize project that meet funding source requirements, including timeliness.

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- c. Describe the grantee's required priority for funding based on the extent to which the rental project has Federal, State, or local project-based rental assistance so that rents are affordable to extremely low-income families. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

Housing affordable to extremely low-income families - those with incomes below 30% AMI or federal poverty line, whichever is higher - is defined as housing in which those families pay no more than 30 percent of their household income for housing costs, including utilities. Project-based rental assistance includes, but is not limited to, unit-based rental assistance, operating subsidies and cross-subsidization of rents within the project. All tax credit applicants and RPLP must set-aside a minimum of ten percent of the total units for persons with disabilities and all of these units (referred to as "Targeted Units") are eligible for state-funded project-based rental assistance known as Key Rental Assistance. Therefore, all rental projects eligible for HTF will be eligible for project-based rental assistance. Rental development applicants who have other types of project-based rental assistance must also provide the source and number of units receiving project-based rental assistance as part of their applications. Project-based rental assistance is stated as a priority in QAP Appendix J.

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- d. Describe the grantee's required priority for funding based on the financial feasibility of the project beyond the required 30-year period. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

The minimum affordability period is 30 years.

For HTF-funded RPP awards, a statement is included in QAP appendices to indicate that it is a threshold requirement for projects requesting HTF to have a minimum 30-year affordability period.

For HTF-funded RPLP awards, awards are made as loans and shall require the project to maintain the period of affordability for the full term of the loan, and in no event shall be less than the required minimum period of affordability.

For HTF-funded SHDP awards, awards are made as loans and shall require the project to maintain the period of affordability for the full term of the loan, and in no event shall be less than the required minimum period of affordability under the applicable funding source regulations.

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- e. Describe the grantee's required priority for funding based on the merits of the application in meeting the priority housing needs of the grantee (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations). If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

The QAP indicates what the State has determined to be the priority housing need(s) it intends to address based on the outcome of its HTF citizen participation process and priority needs indicated in its current Consolidated Plan. The State's Consolidated Plan as well as NC Housing Finance Agency's Strategic Plan, defines households earning 30 percent or less of the AMI to be a high-priority population. The QAP requires that at least 25 percent of the qualified low-income units in a proposed tax credit project be affordable to and occupied by households with incomes at or below 30 percent of AMI to be eligible to receive HTF funds.

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- f. Describe the grantee's required priority for funding based on the extent to which the application makes use of non-federal funding sources. If not distributing funds by selecting applications submitted by eligible recipients, enter "N/A".

All tax credit projects require leveraging of sources, public and private, to fully fund the cost of each housing development. Although the QAP does not provide points for leveraging, NCHFA provides additional opportunities to receive state funding through the state Housing Trust Fund and the Workforce Housing Loan Program to encourage leveraging. The QAP appendix further states priority will be given to projects based on leveraging of non-federal funds. In the event there is a tie in QAP scoring among projects seeking HTF funding, the project with the lowest percentage of federal funding to total sources will be used as the second tie breaker.

The SHDP program requires a minimum ratio of firmly committed matching funds. This ratio is 30% for CDBG entitlement areas and 40% for non-entitlement areas. Additionally, as incentive for increased firmly committed matching funds SHDP offers points in its application competition.

The RPLP program provides a priority in the award competition for projects that secure at least one new below market loan or other financial support to the project.

9.4

4. Does the grantee's application require the applicant to include a description of the eligible activities to be conducted with HTF funds? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes No N/A

5. Does the grantee's application require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements? If not distributing funds by selecting applications submitted by eligible recipients, select "N/A".

Yes No N/A

6. **Performance Goals and Benchmarks.** The grantee has met the requirement to provide for performance goals and benchmarks against which the grantee will measure its progress, consistent with the grantee's goals established under 24 CFR 91.315(b)(2), by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objectives screens.

Yes No

7. **Maximum Per-unit Development Subsidy Amount for Housing Assisted with HTF Funds.** Enter or attach the grantee's maximum per-unit development subsidy limits for housing assisted with HTF funds. The limits must be adjusted for the number of bedrooms and the geographic location of the project. The limits must also be reasonable and based on actual costs of developing non-luxury housing in the area.

If the grantee will use existing limits developed for other federal programs such as the Low Income Housing Tax Credit (LIHTC) per unit cost limits, HOME's maximum per-unit subsidy amounts, and/or Public Housing Development Cost Limits (TDCs), it must include a description of how the HTF maximum per-unit development subsidy limits were established or a description of how existing limits developed for another program and being adopted for HTF meet the HTF requirements specified above.

The State will use HOME maximum per unit development subsidy limits.

The HOME maximum per-unit subsidy limits were chosen for consistency as we also use HOME funds with tax credits. Given that HTF rules closely follow other established rules in the HOME program, it is appropriate to rely upon this limit. Currently, there is only one published limit for the entire state. Based on our experience with rental housing development, there are no significant differences in costs that would require any geographic adjustment from the statewide limit. As of April 2026, current subsidy limits are available through the Federal Register and published electronically through the same at: <https://www.federalregister.gov/documents/2026/04/10/2026-06926/home-investment-partnerships-program-maximum-per-unit-subsidy-limit-methodology-and-amount-notice>

8. **Rehabilitation Standards.** The grantee must establish rehabilitation standards for all HTF-assisted housing rehabilitation activities that set forth the requirements that the housing must meet upon project completion. The grantee's description of its standards must be in sufficient detail to determine the required rehabilitation work including methods and materials. The

standards may refer to applicable codes or they may establish requirements that exceed the minimum requirements of the codes. The grantee must attach its rehabilitation standards below.

In addition, the rehabilitation standards must address each of the following: health and safety; major systems; lead-based paint; accessibility; disaster mitigation (where relevant); state and local codes, ordinances, and zoning requirements; Uniform Physical Condition Standards; Capital Needs Assessments (if applicable); and broadband infrastructure (if applicable).

All NCHFA HTF-assisted rehabilitation program activities are held to the attached rehabilitation standards which incorporate and further require compliance with NCHFA and program-specific requirements including those found in the Appendix of the Qualified Allocation Plan (https://www.nchfa.com/sites/default/files/page_attachments/2026FinalAppendixB1.pdf) and the Appendix of the RPLP guidelines (https://www.nchfa.com/sites/default/files/page_attachments/RPLPAppendixD.pdf).

9. Resale or Recapture Guidelines. Below, the grantee must enter (or attach) a description of the guidelines that will be used for resale or recapture of HTF funds when used to assist first-time homebuyers. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

N/A

10. HTF Affordable Homeownership Limits. If the grantee intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, it must determine 95 percent of the median area purchase price and set forth the information in accordance with 24 CFR 93.305. If the grantee will not use HTF funds to assist first-time homebuyers, enter "N/A".

- The grantee will use the HUD issued affordable homeownership limits.
- The grantee has determined its own affordable homeownership limits using the methodology described in 24 CFR 93.305(a)(2) and the limits are attached.

N/A

11. Grantee Limited Beneficiaries or Preferences. Describe how the grantee will limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population to serve unmet needs identified in its consolidated plan or annual action plan. If the grantee will not limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, enter "N/A."
Any limitation or preference must not violate nondiscrimination requirements in 24 CFR 93.350, and the grantee must not limit or give preferences to students. The grantee may permit rental

housing owners to limit tenants or give a preference in accordance with Â§ 93.303(d)(3) only if such limitation or preference is described in the action plan.

N/A

12. Refinancing of Existing Debt. Enter or attach the grantee's refinancing guidelines below. The guidelines describe the conditions under which the grantee will refinance existing debt. The grantee's refinancing guidelines must, at minimum, demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing. If the grantee will not refinance existing debt, enter "N/A."

NCHFA may use HTF funds for the purpose of assisting existing low-income housing tax credit projects meet the property standards for rehabilitation projects found in 24 CFR § 93.301(b). Including HTF as part of NCHFA's goals to rehabilitate properties in danger of exiting the tax credit program will greatly preserve the existing affordable housing stock which continues to disappear. As a part of using HTF for the rehabilitation of projects, NCHFA will require projects to meet deeper income targeting to assist extremely low-income households or households with incomes at or below the poverty line (whichever is greater). The consequence of doing so will drive the available rents in the project down and therefore, in some instances, may make it difficult for projects to pay their debt obligations. NCHFA will evaluate each project for the possibility of refinancing existing debt to help keep the housing affordable and sustainable. In any event, refinancing is ancillary to the rehabilitation of the project and will only be provided if NCHFA determines it is necessary to reduce the overall housing costs and to make the housing more affordable and proportional to the number of HTF-assisted units in the rental project. The proportional rehabilitation cost must be greater than the proportional amount of debt that is refinanced.

Discussion:

N/A

Appendix - Alternate/Local Data Sources

1	Data Source Name
	HOPWA 2014 CAPER & HOPWA Beneficiary Verification
	List the name of the organization or individual who originated the data set.

	Provide a brief summary of the data set.
	What was the purpose for developing this data set?
	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?
	What time period (provide the year, and optionally month, or month and day) is covered by this data set?
	What is the status of the data set (complete, in progress, or planned)?
2	Data Source Name 2014 - 2018 ACS
	List the name of the organization or individual who originated the data set. U.S. Census Bureau
	Provide a brief summary of the data set. The American Community Survey shows how we live—our education, housing, jobs, and more. The American Community Survey provides information about the social and economic needs of your community every year.
	What was the purpose for developing this data set? Asks about topics not on the 2020 Census, such as education, employment, internet access, and transportation
	Provide the year (and optionally month, or month and day) for when the data was collected. Conducted every month, every year from 2014 - 2018
	Briefly describe the methodology for the data collection. <ul style="list-style-type: none"> • Conducted every month, every year • Sent to a sample of addresses (about 3.5 million) in the 50 states, District of Columbia, and Puerto Rico
	Describe the total population from which the sample was taken. Visit census.gov for details
	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed. Visit census.gov for details

3	Data Source Name 2014 Housing Inventory Count Report
	List the name of the organization or individual who originated the data set. HUD's Continuum of Care Homeless Assistance Programs
	Provide a brief summary of the data set.
	What was the purpose for developing this data set?
	Provide the year (and optionally month, or month and day) for when the data was collected.
	Briefly describe the methodology for the data collection.
	Describe the total population from which the sample was taken.
	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.
4	Data Source Name 2019 Housing Inventory Count Report
	List the name of the organization or individual who originated the data set. Department of Housing and Urban Development
	Provide a brief summary of the data set. Continuum of Care (CoC) Homeless Assistance Programs Housing Inventory Count Reports provide a snapshot of a CoC's HIC, an inventory of housing conducted annually during the last ten days in January, and are available at the national and state level, as well as for each CoC.
	What was the purpose for developing this data set? The reports tally the number of beds and units available on the night designated for the count by program type, and include beds dedicated to serve persons who are homeless as well as persons in Permanent Supportive Housing.
Provide the year (and optionally month, or month and day) for when the data was collected. January 2019	

	<p>Briefly describe the methodology for the data collection.</p> <p>Collection of all beds in a CoC that is entered into HDX</p>
	<p>Describe the total population from which the sample was taken.</p> <p>Summary of all available beds reported, aggregated to the state level</p>
	<p>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</p> <p>Visit https://www.hudexchange.info/programs/coc/coc-housing-inventory-count-reports/?filter_Year=2019&filter_Scope=State&filter_State=NC&filter_CoC=&program=CoC&group=HIC for more information</p>
5	<p>Data Source Name</p> <p>2019 AHAR Part I</p>
	<p>List the name of the organization or individual who originated the data set.</p> <p>HUD Exchange</p>
	<p>Provide a brief summary of the data set.</p> <p>Annual Homeless Assessment Report to Congress</p>
	<p>What was the purpose for developing this data set?</p> <p>This report outlines the key findings of the Point-In-Time (PIT) count and Housing Inventory Count (HIC) conducted in January. Specifically, this report provides national, state, and CoC-level PIT and HIC estimates of homelessness, as well as estimates of chronically homeless persons, homeless veterans, and homeless children and youth.</p>
	<p>Provide the year (and optionally month, or month and day) for when the data was collected.</p> <p>January 2019</p>
	<p>Briefly describe the methodology for the data collection.</p>
	<p>Describe the total population from which the sample was taken.</p>
	<p>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</p>
6	<p>Data Source Name</p> <p>2024 PIT Count by CoC</p>

	<p>List the name of the organization or individual who originated the data set.</p> <p>The Continuum of Care (CoC) Program is designed to promote communitywide commitment to the goal of ending homelessness; provide funding for efforts by nonprofit providers, and State and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; promote access to and effect utilization of mainstream programs by homeless individuals and families; and optimize self-sufficiency among individuals and families experiencing homelessness.</p>
	<p>Provide a brief summary of the data set.</p> <p>Continuum of Care (CoC) Homeless Assistance Programs Homeless Populations and Subpopulations Reports provide counts for sheltered and unsheltered homeless persons by household type and subpopulation, available at the national and state level, and for each CoC. The reports are based on Point-in-Time (PIT) information provided to HUD by CoCs in the application for CoC Homeless Assistance Programs. The PIT Count provides a count of sheltered and unsheltered homeless persons on a single night during the last ten days in January.</p>
	<p>What was the purpose for developing this data set?</p>
	<p>Provide the year (and optionally month, or month and day) for when the data was collected.</p> <p>January 2024</p>
	<p>Briefly describe the methodology for the data collection.</p> <p>HUD requires CoCs to collect reliable data on the total number and characteristics of all people (i.e., sheltered and unsheltered) residing in the CoCs’ geographic area who are homeless on a single night and report these data to HUD. CoCs often do not have complete data on everyone who is homeless and so must estimate some data. Therefore, HUD allows CoCs to use multiple approaches to complete their count, including a census approach, sample, or a combination of census and sampling approaches (shown in the graphic below). It is important for CoCs to closely examine their local circumstances, including resources, capacity, and other reporting needs, to determine whether a census or a sampling approach is appropriate for each aspect of their PIT count</p>
	<p>Describe the total population from which the sample was taken.</p>
	<p>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</p>
<p>7</p>	<p>Data Source Name</p> <p>RealtyTrac</p>

	List the name of the organization or individual who originated the data set.
	Provide a brief summary of the data set.
	What was the purpose for developing this data set?
	Provide the year (and optionally month, or month and day) for when the data was collected.
	Briefly describe the methodology for the data collection.
	Describe the total population from which the sample was taken.
	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.
8	Data Source Name ACS 2019, table DP03
	List the name of the organization or individual who originated the data set. The information was extracted from the ACS 2019, table DP03 and QCEW 2020 by the North Carolina Labor and Economic Development Analysis Division of the North Carolina Department of Commerce for the purposes of the NC Consolidated Plan 2021-2025.
	Provide a brief summary of the data set. Number of workers Table DP03 and Number Employed QCEW 2020
	What was the purpose for developing this data set? To provide the number of workers and employed by business sector in the Non-housing Community Development Section of the Plan
	Provide the year (and optionally month, or month and day) for when the data was collected. July 2021
	Briefly describe the methodology for the data collection. Not applicable
	Describe the total population from which the sample was taken. Not applicable

	<p>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</p> <p>Information was gathered from the American Communities Survey 2019 data</p>
9	<p>Data Source Name</p> <p>2023 ACS Public Use Microdata Sample</p>
	<p>List the name of the organization or individual who originated the data set.</p> <p>US Census Bureau</p>
	<p>Provide a brief summary of the data set.</p> <p>The American Community Survey (ACS) Public Use Microdata Sample (PUMS) files are a set of untabulated records about individual people or housing units.</p>
	<p>What was the purpose for developing this data set?</p> <p>This data set contains non-tabulated data and more variables than available through CHAS or ACS tables.</p>
	<p>Provide the year (and optionally month, or month and day) for when the data was collected.</p> <p>Accessed in 2026, using 2023 PUMS data</p>
	<p>Briefly describe the methodology for the data collection.</p> <p>Publicly available data.</p>
	<p>Describe the total population from which the sample was taken.</p> <p>The same population as ACS or CHAS data.</p>
	<p>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</p> <p>The same population as ACS or CHAS data.</p>
	10
<p>List the name of the organization or individual who originated the data set.</p>	
<p>Provide a brief summary of the data set.</p>	
<p>What was the purpose for developing this data set?</p>	
<p>Provide the year (and optionally month, or month and day) for when the data was collected.</p>	

	Briefly describe the methodology for the data collection.
	Describe the total population from which the sample was taken.
	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.
1	Data Source Name
1	Office of Employment Security
	List the name of the organization or individual who originated the data set.
	Provide a brief summary of the data set.
	What was the purpose for developing this data set?
	Provide the year (and optionally month, or month and day) for when the data was collected.
	Briefly describe the methodology for the data collection.
	Describe the total population from which the sample was taken.
	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.