City of Winston-Salem, Forsyth County, and Housing Authority of Winston-Salem Assessment of Fair Housing

August 2017

Prepared for the City of Winston-Salem, Forsyth County, and Housing Authority of Winston-Salem by



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I. Cover Sheet

- 1. Submission date: October 4, 2017
- 2. Submitter name: City of Winston-Salem, NC
- 3. Type of submission (e.g., single program participant, joint submission): Joint Submission
- **4. Type of program participant(s) (e.g., consolidated plan participant, PHA):** Consolidated Plan Participant, PHA
- 5. For PHAs, Jurisdiction in which the program participant is located: City of Winston-Salem
- 6. Submitter members (if applicable): City of Winston-Salem, Forsyth County, Housing Authority of Winston-Salem
- 7. Sole or lead submitter contact information:
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 - b. Title: Director
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 - d. Street address: Stuart Municipal Building, 100 East 1st Street
 - e. City: Winston-Salem
 - f. State: North Carolina
 - **g. Zip code:** 27101
- 8. Period covered by this assessment: July 1, 2018 to June 30, 2023
- 9. Initial, amended, or renewal AFH: Initial
- 10. To the best of its knowledge and belief, the statements and information contained herein are true, accurate, and complete and the program participant has developed this AFH in compliance with the requirements of 24 C.F.R. §§ 5.150-5.180 or comparable replacement regulations of the Department of Housing and Urban Development;
- 11. The program participant will take meaningful actions to further the goals identified in its AFH conducted in accordance with the requirements in §§ 5.150 through 5.180 and 24 C.F.R. §§ 91.225(a)(1), 91.325(a)(1), 91.425(a)(1), 570.487(b)(1), 570.601, 903.7(o), and 903.15(d), as applicable.

All Joint and Regional Participants are bound by the certification, except that some of the analysis, goals or priorities included in the AFH may only apply to an individual program participant as expressly stated in the AFH.

(Signature) (date)

12. Departmental acceptance or non-acceptance:

(Signature) (date)

II. Executive Summary

1. Summarize the fair housing issues, significant contributing factors, and goals. Also include an overview of the process and analysis used to reach the goals.

Title VIII of the Civil Rights Act of 1968, more commonly known as the Fair Housing Act, ensures protection of housing opportunity by prohibiting discrimination in the sale or rental of housing based on race, color, religion, sex, and national origin (the federally protected classes). The Act was amended in 1988 to include familial status and disability status as protected classes.

The City of Winston-Salem and Forsyth County receive funds from the United States Department of Housing and Urban Development (HUD) through the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Emergency Solutions Grant (ESG) programs. As participants in this program, the City and County are required to complete a fair housing study known as an Assessment of Fair Housing (AFH). As a housing authority, the Housing Authority of Winston-Salem (HAWS) is also required by HUD to complete an AFH. The City, County, and HAWS collaborated on a joint AFH that examines the Winston-Salem and Forsyth County geographies.

The AFH studies patterns of integration and segregation; racially and ethnically concentrated areas of poverty; disparities in access to opportunity; disproportionate housing needs; locations, occupancy, and policies for publicly supported housing; disability and access; and fair housing enforcement and outreach resources and activities. Based on the findings of this research, the AFH proposes fair and affordable housing strategies to overcome the identified fair housing issues.

Public input from local residents and other stakeholders was a key component of the AFH research. The City of Winston-Salem, Forsyth County, and HAWS used a variety of approaches to achieve meaningful engagement with the community on the topics listed above. They hosted two fair housing workshops for the general public and one for HAWS residents with a total of about 40 attendees. A community-wide survey on fair housing received 208 responses. The workshops and survey were advertised with ads in the *Winston-Salem Journal* and *The Chronicle* and on WSTV 13; through flyers posted in government buildings, libraries, and at HAWS properties; and through email invitations to City of Winston-Salem Neighborhood Associations, City of Winston-Salem Neighborhood Watch Chairpersons, Neighbors for Better Neighborhoods, managers and/or mayors of all Forsyth County towns and villages, and HAWS Resident Advisory Committee members.

Representatives from 38 housing and/or community development-related organizations participated in individual or small group interviews to inform the AFH. They represented a variety of relevant viewpoints, including human relations and fair housing, nonprofit housing developers, nonprofit organizations, homeless service providers and Continuum of Care representatives, neighborhood organizations representing low/moderate income areas, organizations representing African American and Latino residents, organizations representing people with disabilities, mortgage lenders, real estate agents, local colleges, faith-based organizations, mental health care providers, and schools.

This Executive Summary provides a brief overview of the study's key findings, followed by an outline of fair housing goals and related actions.

Segregation and Integration

To measure levels of racial and ethnic segregation, HUD uses a dissimilarity index (DI), which indicated the degree to which a minority group is separated from a majority group residing in the same area because the two are not evenly distributed geographically. Segregation is minimized when all small areas (census tracts, in this analysis) have the same proportion of minority and majority members as the larger area in which they live. The DI ranges from 0 (complete integration) to 100 (complete segregation), with HUD identifying a DI value below 41 as low segregation, a value between 41 and 54 as moderate, and a value of 55 or above as high segregation. The City of Winston-Salem and Forsyth County fall within HUD's "moderate" range for most racial and ethnic groups. Segregation between Black and white residents and Latino and white residents is roughly equivalent in Winston-Salem, while segregation between whites and Asians is considerably lower. This trend holds at the county level, although segregation levels there are slightly higher for each pairing. Regionally, one pairing (African Americans and whites) shows high segregation levels.

Since 1990, segregation between whites and Blacks fell steadily each decade in all three geographies (city, county, and region). Segregation between whites and Latinos nearly doubled from 1990 to 2000 as the Latino population grew considerably. Between 2000 and 2010, segregation levelled off, with dissimilarity indices showing slight declines over the decade. Between white and Asian residents, segregation in Winston-Salem and Forsyth County has been consistently low since 1990, with declines between 1990 and 2000 but little change between 2000 and 2010. Factors contributing to segregation include the location and type of affordable housing, lack of public and private investment in specific neighborhoods, and need for continued community revitalization strategies.

Racially and Ethnically Concentrated Poverty

This study uses a methodology developed by HUD that combines demographic and economic indicators to identify racially or ethnically concentrated areas of poverty (R/ECAPs). As of 2010, Forsyth County contained eight contiguous R/ECAP census tracts, all in downtown Winston-Salem or east Winston. No R/ECAP tracts existed in Forsyth County outside of Winston-Salem. Both Black and Latino residents are disproportionately likely to reside in an R/ECAP. The shares of R/ECAP residents who are African American or Latino is more than double the regional population share. African Americans are 7.3 times more likely than whites to live in an R/ECAP and Latinos are 5.5 times more likely to do so.

Historical data indicates that concentrations of poverty existed in several present-day R/ECAP tracts for at least 20 years, generally having expanded since 1990. Factors contributing to the presence of R/ECAPs include location of affordable housing, lack of public and private investment, lack of community revitalization, and deteriorated and abandoned properties.

Disparities in Access to Opportunities

Among the many factors that drive housing choice for individuals and families are neighborhood factors such as access to quality schools, jobs, and transit. To measure economic and educational conditions at a neighborhood level, HUD developed a methodology to quantify the degree to which a neighborhood provides such opportunities. This report provides analysis of the index scores on

several "opportunity dimensions," including school proficiency, poverty, labor market engagement, jobs proximity, transportation costs, transit trips, and environmental health.

On average, non-Latino whites live in neighborhoods with lower poverty and higher school proficiency and labor market engagement index values than African Americans and Latinos, both in the city of Winston-Salem and in Forsyth County. R/ECAP census tracts generally had low scores in each of these dimensions. Opportunity factors related to environmental health and access to transit and job centers showed less disparity, and in many cases, whites lived in areas with lower scores and thus less access than other groups. The R/ECAP tracts had higher scores on these dimensions. Location of affordable housing, location of proficient schools and school assignment policies, and access to jobs related to factors such as educational attainment, job training, job search assistance, and hiring practices were identified as factors contributing to these disparities.

Disproportionate Housing Needs

The AFH analyzes four unique housing needs: cost burden, overcrowding, dwellings lacking complete kitchen facilities, and dwellings lacking complete plumbing facilities. In Winston-Salem, more than one-third of households (37%) have one or more housing needs; in Forsyth County, 33% of households have a housing need. African American, Latino, and other non-Latino households experience housing needs at disproportionately higher rates than whites in both Winston-Salem and Forsyth County. They are disproportionately likely to be impacted by cost burdens and severe cost burdens, meaning that affordability is more likely to influence housing choice for these groups than for white households. Additionally, African Americans in Winston-Salem and Forsyth County were disproportionately likely to face homelessness when compared to white residents. Factors contributing to disproportionate housing needs include the availability of affordable units, reduced access to homeownership, and homelessness.

Publicly Supported Housing

Forsyth County contains 1,459 units of public housing, 1,262 units subsidized by project-based Section 8, and 4,482 Housing Choice Voucher holders. Although Black households make up 26% of the county and account for 45% of the county's very low-income population, 91% of voucher holders and 90% of public housing residents are African American. White households, in contrast, are more likely to reside in Project-Based Section 8 units than hold a voucher or live in public housing.

Generally, publicly supported housing properties, particularly those in Winston-Salem's core, are located in segregated communities comprised primarily of Black residents. Only the properties furthest from the city center are located in integrated neighborhoods. However, some differences are present when analyzing the individual types of publicly supported housing. Nearly all public housing properties are located in or adjacent to R/ECAPs and two of the four tracts with highest HCV use are R/ECAPS while the remaining two tracts are adjacent to these areas of concentrated poverty. Other types of publicly supported housing (Project-Based Section 8, Other HUD Multifamily Assisted developments, and LIHTC) are relatively more widely distributed throughout Forsyth County. Factors contributing to fair housing issues related to publicly supported housing include impediments to mobility and site selection policies, practices and decisions.

Disability and Access

In Forsyth County, an estimated 11% of persons over the age of 5 have a disability, comparable to the city of Winston-Salem's disability rate of 12%. Stakeholder input indicates that, while the region has been working to add more accessible housing, the current supply is not sufficient to meet the population's needs for affordable, accessible housing in a range of unit sizes. HAWS reports that five percent of the housing it provides is accessible to persons with disabilities. The private market also supplies some affordable housing that is accessible to people with disabilities, however, such housing options are scarce. HUD's Affordable Apartment Search Tool identifies a total of just 13 affordable rental properties in Forsyth County designed to serve people with disabilities.

The Winston-Salem/Forsyth County Unified Development Ordinance specifies that persons with disabilities may request a reasonable accommodation to zoning and land use requirements by applying to either the Board of County Commissioners or the Winston-Salem City Council. However, the ordinance lacks specificity as to the form that the request should take; the timeframe within which the reviewing authority must make a decision; the form that a decision must take and whether conditions may be attached; and how to appeal a decision. In addition to improving the local reasonable accommodation ordinance, affordable, integrated housing for people who need supportive services would help address fair housing issues related to disability and access.

Fair Housing Enforcement and Outreach

North Carolina has adopted a parallel version of Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988, known as the State Fair Housing Act. The state law does not extend protections to any other classes of persons outside of those protected by the federal FHA, but it does make it an additional unlawful discriminatory housing practice for a local government to discriminate against "affordable housing" in land-use decisions or permitting. Winston-Salem also has adopted a local fair housing ordinance to establish local procedures for executing fair housing laws and policies and protecting against discriminatory housing practices.

The Winston-Salem region has three primary sources of fair housing information, outreach, and enforcement: The City of Winston-Salem Human Relations Commission, the North Carolina Human Relations Commission, and HUD's Office of Fair Housing and Equal Opportunity. The City's Human Relations Department provides most fair housing activities in Winston-Salem, including education and outreach campaigns, fair housing testing, receiving complaints, investigating allegations of discrimination, seeking conciliation and settlement among parties to a complaint, and holding evidentiary hearings and making findings of fact and conclusions of law. The Department has two full-time Human Relations Specialists to carry out these activities, both of whom are bilingual and one of whom has the duties of a bilingual investigator and Hispanic outreach coordinator. While the City has an active fair housing outreach program, its activities could be bolstered with additional resources.

Fair Housing Goals

The City of Winston-Salem, Forsyth County, and HAWS identified the following fair housing goals based on the AFH research and findings. The goals will direct strategies to alleviate the fair housing issues and contributing factors described above.

- 1. Implement place-based community investment strategies to increase opportunity measures in R/ECAPs: In areas of racially and ethnically concentrated poverty, public investments will focus on increasing opportunities (as may be measured by HUD's poverty, school proficiency, labor market participation, transit usage, transportation cost, jobs proximity, and environmental health indices) in specific geographic areas. These place-based investments will recognize and build upon existing assets within the communities to be improved, including local interpretations of opportunity that may not be accounted for among HUD's specified indices. Place-based investments will simultaneously improve the built environment while advancing human capital development for the people residing in the community. Planning related to the Cleveland Avenue, Boston-Thurmond, and Bowen Park/Dreamland areas provide a starting point for place-based investments, and strategies called for in those areas will be advanced.
- 2. Focus new construction of affordable housing in neighborhoods that offer greater access to opportunities: To the degree new construction of affordable housing will be supported (as opposed to housing rehabilitation that preserves existing affordable units), siting of such developments will consider the surrounding community's access to opportunities and locations maximizing access will be prioritized. Consideration of these factors will result in expanded affordable housing options in communities of choice that offer amenities and resources that residents need to thrive.
- **3. Improve mobility for low- and moderate-income residents:** Low- and moderate-income households typically face a variety of barriers in considering a move to a community that may offer greater opportunities, such as better schools or increased employment options. These barriers may be financial (saving up security deposits and down payments), physical (not having a way to pack and move one's belongings), and psychological (not wanting to leave behind one's social and support networks). One-third of households with HCVs, who theoretically have a large degree of flexibility in where they choose to live, live in R/ECAP communities. While many R/ECAP residents desire to stay in their neighborhood, others may wish to move to other areas in the city or county, and those residents should be supported through the transition. The responsible program participants will develop a joint program to provide support to HCV holders and other households considering moves and will focus on other community development activities to help increase residential mobility opportunities for low- and moderate-income households, such as economic development incentives and improved transportation options.
- **4. Expand homeownership opportunities:** Stakeholders consulted throughout the process of developing this assessment described significant barriers faced by some people of color, particularly African Americans and Latinos, to homeownership. The three responsible program participants will each continue to fund and support programming that expands homeownership opportunities for low- and moderate-income households and people of color, such as financial assistance to homebuyers, financial literacy, and financing support for housing production.
- **5. Protect existing housing stock:** Helping homeowners improve and maintain existing single-family housing in R/ECAP census tracts will prevent property deterioration and serve as an

incentive for additional private investment. Additionally, homeowner rehabilitation may help households address deferred maintenance, enabling low- and moderate-income households and households of color to remain in their homes as homeowners longer than they otherwise may have been able to. Homeownership rehabilitation programs and multifamily rental rehabilitation will both help reduce housing costs (or limit cost increases) for low- and moderate-income households, including African American and Latino households who face housing needs and severe cost burdens at disproportionately higher rates than white households.

- **6. Improve existing reasonable accommodation processes:** The Unified Development Ordinance adopted by Winston-Salem and Forsyth County is commended for including a separate process for people with disabilities to request reasonable accommodations, however there remains room to improve the provision. The City and County will work through their planning staffs and elected officials, with public input, to add specificity to the UDO's reasonable accommodation process around the form that requests should take, the time frame within which the reviewing authority must make a decision, the form that a decision must take, whether conditions may be attached, and how to appeal a decision.
- 7. Support fair housing education and enforcement efforts: Fair housing education both for the public and housing professionals (such as lenders, real estate agents, landlords, and property managers) is an ongoing need. The City, County, and HAWS will all continue to support efforts to provide fair housing education throughout the community. Education targeted to non-English speakers and undocumented immigrants was described by stakeholders as a particular need and will specifically be supported.
- 8. Implement strategies to decrease homelessness: Homelessness disproportionately impacts people of color, whose lack of access to housing can constitute a fair housing issue. Existing programs and strategies for transitioning homeless persons into permanent housing and otherwise reducing the number of homeless people in the community will continue to be implemented by Winston-Salem, Forsyth County, and HAWS through the Continuum of Care.

III. Community Participation Process

1. Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AFH process, including the types of outreach activities and dates of public hearings or meetings. Identify media outlets used and include a description of efforts made to reach the public, including those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as R/ECAPs, persons who are limited English proficient (LEP), and persons with disabilities. Briefly explain how these communications were designed to reach the broadest audience possible. For PHAs, identify your meetings with the Resident Advisory Board.

The City of Winston-Salem, Forsyth County, and the Housing Authority of Winston-Salem (HAWS) used a variety of approaches to achieve meaningful public engagement with residents and other stakeholders from across the county.

Fair Housing Workshops

Three fair housing workshops were held in February 2017. Two were open to the general public and one was open to HAWS residents, voucher holders, and Resident Advisory Committee members. Each workshop began with a short presentation providing an overview of the Assessment of Fair Housing, related fair housing law, and ways to provide input for the study. The remainder of the workshops were devoted to an interactive discussion of fair housing, neighborhood conditions, and community resources in Winston-Salem and Forsyth County. Approximately 40 attendees came to the workshops, with a total of 33 people signing in. Meeting dates, times, and locations are shown below:

Public Workshop Hosted by Forsyth County

Wednesday, February 15, 2017 at 6:00 pm Rural Hall Public Library Auditorium 7125 Broad Street Rural Hall, NC 27045

PHA Resident, Voucher holder, and Resident Advisory Committee Member Workshop Hosted by HAWS

Wednesday, February 15, 2017 at 6:00 pm Cleveland Avenue Homes Community Center 1135 East 15th Street Winston-Salem, NC 27105

Public Workshop Hosted by the City of Winston-Salem

Thursday, February 16, 2017 at 6:00 pm Hanes Hosiery Community Center 501 Reynolds Boulevard Winston-Salem, NC 27105

Stakeholder Interviews

During the week of February 13, 2017, individual and small group stakeholder interviews were held at the Enterprise Center in Winston-Salem. For people unable to attend in-person interviews, followup via telephone was conducted during February and March. Stakeholders were identified by staff from the city's Community and Business Development Department and Planning Division, the county's Department of Housing and Community Development, and HAWS. They represented a variety of relevant viewpoints, including human relations and fair housing, nonprofit housing developers, nonprofit organizations, homeless service providers and Continuum of Care representatives, neighborhood organizations representing low/moderate income areas, organizations representing African American and Latino residents, organizations representing people with disabilities, mortgage lenders, real estate agents, local colleges, faith-based organizations, mental health care providers, and schools. City and County staff from public health, emergency services, community assistance, and transportation/transit were also invited to participate in interviews, along with members of HAWS staff and boards.

Interview invitations were made by email and/or phone to 59 stakeholders identified by the City, County, or HAWS. Thirty-eight people participated in an interview, and their organizations are listed in response to the next question in this section. A summary of input received from interviewees is provided in response to question four.

Community Survey

The third method for obtaining community input was a 26-question survey available to the general public, including residents and other stakeholders. The survey was available online and in hard copy in both English and Spanish from February 6 through March 17, 2017. A total of 208 respondents completed the survey. A summary of results is provided in response to question four of this section, with complete results available in the appendix to this document.

Community Engagement Advertisement

A variety of techniques were used to advertise the fair housing workshops and community survey to as broad an audience as possible. They included:

- An ad placed in the Winston-Salem Journal and The Chronicle;
- Advertisement about the project on WSTV 13 (the local government channel);
- Flyers in English and Spanish posted in government buildings, Forsyth County library branches, and at HAWS properties;
- Invitation to participate and flyer distribution to City of Winston-Salem Neighborhood Associations, City of Winston-Salem Neighborhood Watch Chairpersons, Neighbors for Better Neighborhoods, and managers and/or mayors of all Forsyth County towns and villages (a total of 250 contacts);
- Invitation to participate and flyer distribution to HAWS Resident Advisory Committee members;
- Dissemination of the online survey links to all City of Winston-Salem employees; and
- Hard copy surveys made available at the City of Winston-Salem Community and Business Development Department and HAWS properties.

To facilitate participation by persons with limited English proficiency, flyers and surveys were available in English and Spanish. The flyers contained instructions for participants on how to request interpretation services or accessibility accommodations at the workshops. All workshop locations were ADA accessible. Workshops located in the City of Winston-Salem were served by public transit, and one was located in an R/ECAP.

The diversity of the participants in the community engagement process is reflected in the demographic makeup of public survey respondents. Of the 208 respondents:

- 44.9% were people of color;
- 11.3% represented households containing one or more people with a disability;
- 17.6% represented households where a language other than English is spoken;
- 25.7% were renter households; and
- 5.4% lived in public housing or other subsidized housing.

Additionally, an estimated 42% of fair housing workshop attendees lived in public housing or held a housing choice voucher.

Public Comment Period

A 45-day public comment period to receive input on the draft AFH was held from July 6, 2017 through August 20, 2017. The draft was available online; at city, county, and HAWS offices; and at all Forsyth County public library branches. Three public hearings were held during the comment period, and included a presentation of the draft report and opportunities for the public to provide input on the draft. Meeting dates, times, and locations are shown below, with sign-in sheets provided in the appendix:

Public Hearing Hosted by HAWS

Tuesday, July 25, 2017 at 6:00 pm Cleveland Avenue Homes Community Center 1135 East 15th Street Winston-Salem, NC 27105

Public Hearing Hosted by the City of Winston-Salem

Tuesday, August 1, 2017 at 5:30 pm Stuart Municipal Building, 5th Floor Public Meeting Room 100 East First Street Winston-Salem, NC 27101

Public Workshop Hosted by Forsyth County

Wednesday, August 2, 2017 at 5:30 pm Walkertown Public Library Auditorium 2969 Main Street Walkertown, NC 27051

HAWS also presented the draft report to their Resident Advisory Board on August 16, 2017. Comments received at the public hearings included:

- Legal Aid Fair Housing Project undertakes fair housing education and information campaigns among its clients and its Fair Housing Committee plans to submit a written response, largely asking for more ambitious goals
- Suggestion that Winston-Salem, Forsyth County and/or HAWS create a list of all properties that have some affordability requirement or tax-credit support, to increase awareness of the location and existence of housing for people with low-to-moderate incomes
- Legal Aid of North Carolina has an in-house list of subsidized and affordable units
- More should be done to solve issue of housing affordability
- The analysis should include more about the historical aspect of fair housing and how historical events and trends continue to impact various protected classes under the Fair Housing Act, particularly the intersection of housing and schools, as well as the impact of discrimination on certain minority groups; the commenter has written a research report on the topic and shared it for inclusion of relevant ideas in the AFH

One written comment was received from Legal Aid of North Carolina (full comment included in the appendix). After review of Legal Aid's input by the City, County, and HAWS, numeric goals were added for several metrics identified in the fair housing goals table (Table 22), where appropriate; fair housing testing was also added as a metric.

2. Provide a list of organizations consulted during the community participation process.

Representatives of the following organizations were consulted in some fashion in the development of this AFH. Consultations may have occurred in an interview, participation at a public meeting or event, or other correspondence:

- Blanco Tackabery
- Boston-Thurmond Neighborhood Association
- Cardinal Innovations Healthcare
- Center for Homeownership
- Fairway Independent Mortgage
- Family Services
- Financial Pathways of the Piedmont
- First Citizens Bank
- Forsyth County Department of Housing and Community Development
- Forsyth County Department of Public Health
- Forsyth Technical Community College
- Goler CDC
- Goodwill Industries
- Hispanic League
- Housing Authority of Winston-Salem
- Housing Authority of Winston-Salem Board of Commissioners
- Housing Authority of Winston-Salem Resident Advisory Committee
- Legal Aid of North Carolina, Inc.
- North Carolina Department of Transportation, Division 9
- Northwest Winston-Salem Neighborhood Association

- Samaritan Ministries
- St. Timothy's Episcopal Church
- United Way of Forsyth County
- Winston-Salem City Council
- Winston-Salem Community Assistance
- Winston-Salem Community and Business Development Department
- Winston-Salem Fire Department
- Winston-Salem Human Relations Department
- Winston-Salem Police Department
- Winston-Salem Regional Association of REALTORS®
- Winston-Salem Transportation Department
- Winston-Salem Urban League
- Winston-Salem/Forsyth County Asset Building Coalition
- Winston-Salem/Forsyth County Continuum of Care
- Winston-Salem/Forsyth County Planning and Development Services Department
- Winston-Salem/Forsyth County Schools

3. How successful were the efforts at eliciting meaningful community participation? If there was low participation, provide the reasons.

Over 250 people participated in the community engagement process used to develop this AFH. A total of about 40 people attended one of the three fair housing workshops offered. Conversation in these settings was insightful and constructive, and participants generally showed an understanding of and engagement with the discussion topics. Participation was strongest at the two meetings held in Winston-Salem locations, which were in or near the city's R/ECAPs. The meeting hosted by HAWS at Cleveland Avenue Homes Community Center was well-attended by public housing residents or voucher holders, who are often underrepresented in planning processes.

Thirty-nine (39) community stakeholders were interviewed either individually or in small group settings with peers from related organizations. These stakeholders represented a wide variety of viewpoints, from professional fair housing advocates to local planning and zoning staff, to neighborhood association members, to religious leaders. Overall, local stakeholders were very willing to participate in the interview process; several people who did not participate in interviews attended a community meeting or said they would complete the survey.

A public fair housing survey was completed by 208 respondents, including various populations that are traditionally difficult to engage in community planning efforts. The survey was advertised in the Winston-Salem Journal and The Chronicle, on WSTV 13, and through flyers distributed to neighborhood associations, neighborhood watch chairpersons, town managers, and stakeholder organizations contacted for interviews, and displayed in public library branches, government buildings, and HAWS properties. Hard copies of surveys were available at the Winston-Salem Community and Business Development Department and at HAWS properties.

4. Summarize all comments obtained in the community participation process. Include a summary of any comments or views not accepted and the reasons why.

For the community participation process associated with this AFH, the consulting team developed a standard question set for use in public workshops and interviews. Listed below are each of the questions along with summarized comments from interview participants and meeting attendees. These comments do not necessarily reflect the views of the City of Winston-Salem, Forsyth County, or HAWS.

There were no comments or views expressed that were not accepted and considered in the development of this AFH.

Fair Housing Workshops

Workshop #1: Rural Hall Public Library Auditorium

- 1. Where are Forsyth County's areas of opportunity? What makes them attractive places to live? What barriers might someone face in moving to one of these high opportunity areas?
 - Not familiar with all of the county but works with families in Boston-Thurmond and La Deara Crest
 - The people she works with do like their neighborhoods but would like more grocery stores and things for kids to do afterschool
 - There is heavy community involvement, especially through churches
 - Transportation and access to bus routes is important for many families
 - Being near jobs is very important but there's a difference between being near something and being a part of it (e.g., the Innovation Quarter)
- 2. Do area residents of similar incomes generally have the same range of housing options? Are there any barriers other than income/savings that might limit housing choices?
 - Places you can live with Section 8 are concentrated; many are apartment properties in bad condition
 - Should be a mix of ownership and rental housing
 - Delayed maintenance is an issue for a lot of apartments
 - Lots of homes in East Winston lost value in recent revaluations; why do some places but not others hold their value?
 - Investors bought foreclosures to rent them
- 3. What types of fair housing services (education, complaint investigation, testing, etc.) are offered in the area? Who provides these services? Are these services effective? How well are they coordinated with the work of other organizations in the community?
 - Human Relations Department, but only serves city
 - United Way does some education
 - Experiment in Self-Reliance does some education around financial literacy/taxes
 - State's fair housing agency is not responsive, better to contact Human Relations
- 4. Are public resources (e.g. parks, schools, roads, police & fire services, etc.) invested in evenly throughout all neighborhoods?
 - For schools, yes and no; there's choice of what schools you can attend and a shuttle is available within a district

- Tax sharing between urban and suburban schools means your taxes may go towards a school your child cannot attend
- Some schools were left behind as resources went to build new schools in the suburbs
- Banks close in some neighborhoods and check cashing is only financial services available
- Same amenities should be in place in all neighborhoods
- 5. Is there anything we haven't discussed that you feel is important to our research?
 - Incentives for businesses need to make a better connection to low income folks; job training partnerships would be good
 - Sidewalks are needed; trail network connecting downtown
 - Homeless shelters/services are needed all over; now they're concentrated in downtown

Workshop #2: Cleveland Avenue Homes Community Center

- 1. Where are Forsyth County's areas of opportunity? What makes them attractive places to live? What barriers might someone face in moving to one of these high opportunity areas?
 - Downtown less drugs and crime; close to jobs and services but the cost of living is high
 - Cleveland Avenue "wonderful people here," good neighbors
 - Woodland good neighbors, beautiful
- 2. If you could move to a different neighborhood, would you?
 - Would stay because of good access to downtown
 - East Winston is prime real estate
 - There's no economic development opportunities in East Winston, but otherwise it would be a wonderful place to live
 - Would move to Davidson County because of wide open spaces and peacefulness
- 3. Do area residents of similar incomes generally have the same range of housing options? Are there any barriers other than income/savings that might limit housing choices?
 - The "income" piece of this question is problematic; can hold income equal between Black and white people
 - Criminal backgrounds prevent people from working and having income
- 4. Are people in the area segregated in where they live? What characteristics define the segregation? What causes it to occur?
 - Segregated by US-52, which started 60 years ago with city officials
 - City purposely puts shelters, food pantries, and social services in East Winston
 - Fear of the other has been stoked
 - Economics is part of the picture, but how people look makes a difference
- 5. Are public resources (e.g. parks, schools, roads, police & fire services, etc.) invested in evenly throughout all neighborhoods?
 - East Winston does not get much investment in its streets; potholes take 6-12 months to be filled
 - East Winston parks lack swings and trees
 - Streets are terrible, signs aren't visible, not enough street lighting

- East Winston is so far behind, receiving its "fair share" isn't enough to catch it up with the rest of the city; equal and equitable are different
- 6. Is there anything we haven't discussed that you feel is important to our research?
 - News stories focus on East Winston crime; you don't see the church revivals and neighbors helping one another

Workshop #3: Hanes Hosiery Community Center

- 1. Where are Forsyth County's areas of opportunity? What makes them attractive places to live? What barriers might someone face in moving to one of these high opportunity areas?
 - West End Boulevard
 - Clemmons, Lewisville
 - Along Business 40 there are more stores and healthier places to eat
 - East Kernersville
 - Downtown, but the barrier is cost
 - Difficult for young people to find affordable housing
 - Location of schools impact where people want to live
 - People want to live hear work, major roads, and shopping centers
- 2. Are people in the area segregated in where they live? What characteristics define the segregation? What causes it to occur?
 - Yes, segregation is based on infrastructure (schools, employment opportunities, availability of healthcare, food deserts)
 - Criminal background plays a big role in impacting employment and housing opportunities; need to support efforts to ban the box
 - Countywide, Kernersville is more diverse now and has diverse types of housing
- 3. Are you aware of any housing discrimination that occurs in the region? What are some things that can be done to overcome discrimination?
 - Redlining occurs and property is devalued based on ZIP code
 - Certain felonies are ok, others are not
- 4. What types of fair housing services (education, complaint investigation, testing, etc.) are offered in the area? Who provides these services? Are these services effective? How well are they coordinated with the work of other organizations in the community?
 - City's Human Relations office does testing
 - There are no resources other than the City
 - Legal Aid, but this is more related to housing conditions or landlord/tenant problems
- 5. Are public resources (e.g. parks, schools, roads, police & fire services, etc.) invested in evenly throughout all neighborhoods?
 - "No, of course not"
 - There are food deserts and differences in access to stores (WalMart, for example)
 - Not many parks in urban areas and they're not well-maintained
 - There are parks everywhere

- 6. Is there anything we haven't discussed that you feel is important to our research?
 - Everyone talks about going someplace else, but for the person who wants to stay in East Winston, the question is What does it take to make the area where you are now more comfortable?
 - Would like to see things like grocery stores, sidewalks, improved safety, new schools for East Winston to be more attractive
 - People here do have money to spend, but they have to go further out to spend it because that's where the stores are; people in East Winston end up driving to support stores in other neighborhoods and can't get any in their neighborhood
 - The argument that there's not enough income here to support retail is false
 - When you remove a school from a neighborhood, people will leave
 - As downtown spreads out, gentrification will happen; need to be careful
 - Can't prove redlining, but know that as NE Winston became browner, the grocery stores moved out; there used to be 4 of them here
 - Housing should be mixed income so poverty isn't concentrated

Stakeholder Interviews

- 1. What do you believe are the greatest fair housing needs or affordable housing needs in the community? Are there parts of the city or county that are particularly affected?
 - Fair housing complaints related to race and disability in rental and for-sale properties
 - National origin discrimination is perceived to be high
 - Community honors fair housing but you have to be diligent with ongoing education and training
 - Affordable housing is often inadequate and poorly maintained by landlords
 - Affordable rental and homeownership housing; rental market is tight
 - Affordable housing for homeless persons; city has made great strides in addressing veteran homelessness
 - Affordable housing in downtown and the western part of the city
 - Affordable housing; sometimes there's a disconnect between what city staff identifies as a need and what city council wants
 - Need to work to address issues of disparity of housing patterns between urban and suburban areas
 - Provide a diversity of housing choices, especially as more households look for options other than single-family homes
 - Jobs so people can afford housing
 - Language is an issue; if info isn't printed in Spanish and there isn't an interpreter or someone that speaks Spanish, Spanish speakers may leave and not come back
 - People afraid to seek help because of their immigration status and/or documentation
 - Affordable, decent housing in redlined areas; tenants are often afraid to complain about maintenance problems because landlords are local leaders

- 2. Where are Winston Salem's areas of opportunity? What makes them attractive places to live? What barriers might someone face in moving to one of these high opportunity areas?
 - Downtown is well along in the process of redevelopment and people are attracted to the ease of access to resources, but price is out of reach for low and middle income families
 - Being downtown is important for people without cars; they need access to buses and areas that are walkable
 - Downtown is the area of greatest opportunity; it will be the focal point for the whole county but cost is a barrier
 - Downtown and west Winston-Salem because of low crime rates (real or perceived), quality of schools, accessible public transit, and shopping centers
 - The further west of US-52, the better; Downtown is also desirable
 - Ardmore is the most centrally-located neighborhood and it has retail, is safe, good schools, and some affordable housing
 - Downtown, Ardmore, Tanglewood Park, Holly Avenue
 - The North End is nice and has good high school, good parks but not good transit access
 - Reynolda, Stratford Road, Silas Creek
 - Kernersville, Rural Hall, Clemmons
 - Lewisville, Clemmons
 - Places that are walkable to grocery stores, parks, restaurants, libraries for computer use, tutoring, and other activities
 - Areas around middle and high schools
 - People want to live where it is safe and they don't have to worry about things
 - Not all amenities have value to all residents; some may value having a bar on the corner or having a great park nearby, but for others, that's not a draw
 - Barriers include transportation and money
 - Homeownership barriers getting a loan; not having steady income; potential criminal record; no one you know owns a home
 - Rental barriers rent amounts, screening criteria, non-refundable application fees and deposits required
 - Wake Forest students compete for available housing in neighborhoods of choice
- 3. Do area residents of similar incomes generally have the same range of housing options? Are there any barriers other than income/savings that might limit housing choices?
 - Familial status is often a barrier; also, people are not offered same loan products
 - Skin color makes a difference; Familial status too, but to a lesser degree
 - Sure that things like race and ethnicity would probably still impact where people live
 - Landlords are not responsive to maintenance issues unless the tenant is white
 - Opportunities are equal and neighborhoods are diverse; Highway 52 is a dividing line of race
 - Opportunities are equal for those with the same financial means
 - Similar incomes have the same options, but option doesn't mean that that's what you want to do. People want to live around people like them because that's where they're comfortable. Even if they can afford different housing, they'll opt to live with similar people.
 - Folks stick to areas they know and feel safe and comfortable
 - Yes, people have the same options but may not know about all their options

- Yes, as long as assets and credit is ok
- The tobacco industry shaped segregation
- Mobility is a big challenge; relying on public transportation is a barrier
- People can't stay in some neighborhoods even if they want to if there's nowhere to buy groceries or cash a check, no way to get kids to school, the affordability of the neighborhood is outweighed
- Poor credit history and/or criminal backgrounds are often reasons for housing denials
- 4. Are people in the area segregated in where they live? What characteristics define the segregation? What causes it to occur?
 - East Winston is overwhelmingly minority, African American; historical factors caused segregation
 - Highway 52 one side is downtown (factories); 52 is a mental barrier too
 - The East Side is cheaper and property values are lower. This may lead poorer people to live there. It has historically always been that way.
 - There are six areas where someone can purchase a home for \$80,000-\$100,000 and they're all African America neighborhoods, not integrated
 - Northeast, east, and southeast Winston-Salem is predominately African American and southwest, west, and northwest is predominately white
 - Different wards clear wealth differences during election time
 - City is segregated by economics more than by race; newer developments are more integrated
 - Diverse areas Brownsboro Road, Speas elementary school, Forsyth Tech
 - Segregation was caused by the tobacco industry; Wake Forest in gentrifying the community
 - History perpetuates segregation. If people could move, they would. But they haven't been able to increase their socioeconomic status.
 - They are segregated; A lot of the segregation is by choice; A lot of the segregation is based on the history of how integration came about
 - Doesn't know the history of segregation; doesn't know if segregation is intentional or just continual
 - Segregation is unconscious; it's a habit
 - Racial residency patterns have been around for a long time and are slowly becoming more diverse; slow growth rate inhibits change
 - School system contributes to segregation, with better schools in nicer areas
 - Lots of NIMBY mentalities
 - Segregation is not an accident; It has been maintained because the people who made the rules wanted it that way
 - As Latino population moved to East Winston, issues between Latino and African American residents; a series of talks and activities between the two communities ("Beyond Soul and Salsa") helped to dispel stereotypes
 - Many Latino residents want to live near the Latino grocery store which provides a taxi service with a minimum purchase
 - Countywide, Clemons and Lewisville are predominately white; Kernersville is becoming more diverse and has a fairly sizeable Latino population on its east side

- 5. Are you aware of any housing discrimination that occurs in the region? What are some things that can be done to overcome discrimination?
 - Human Relations Department data has found that there is still discrimination occurring
 - Yes, discrimination related to documentation for immigrants; may specify what type of ID people can provide
 - Language barriers with landlords can create prejudice
 - Discrimination against people with mental illness by landlords
 - Yes, renters face discrimination on the basis of familial status; Single mothers often face harassment
 - Islamaphobia as of 3-4 years ago
 - Redlining; real estate agents are white and probably take clients to certain areas based on race
 - There is discrimination in the rental market from time to time; less so in the homebuying market
 - Not an issue with real estate professionals but may be with private owners who want to limit who they rent to
 - There are remnants of that from time to time; hasn't heard that it is widespread
 - Not aware of any; doesn't want to dismiss it and say it doesn't happen
 - Not sure if discrimination, but housing policy doesn't take into account mental illness
 - Not aware of any
 - Doesn't know of anything; sure it exists; "good ol boy sytem" runs deep
- 6. Is there an adequate supply of housing that is accessible to people with disabilities?
 - Yes, to his knowledge; Winston does a great job of Housing First Model, which includes folks with mental disabilities and addictions
 - Yes, there's an adequate supply
 - Not aware that there's not an adequate supply; area has improved significantly in this regard
 - ADA guidelines are closely followed in multi-family development
 - There are a range of group homes but surely not everyone with a disability has a home that fits their needs
 - Need more housing for the mentally disabled otherwise, they end up in homeless shelters
 - LIHTC doesn't do a good job of serving the population <30% AMI; Permanent Supportive Housing is needed for this group
 - Not sure; haven't heard about that problem from constituents
 - Doesn't know
 - I don't know, but there are more group homes within neighborhoods that serve populations with disabilities
 - Not many available accessible apartments; affordability is also an issue
 - Probably not given that population is aging
- 7. What types of fair housing services (education, complaint investigation, testing, etc.) are offered in the area? Who provides these services? Are these services effective? How well are they coordinated with the work of other organizations in the community?
 - The City's Human Rights department deals with discrimination and mediation
 - North Carolina Human Relations Commission

- Refer complaints to Legal Aid and HUD
- Industry organizations
- HAWS is always trying to get landlords and they give them a training
- Doesn't know
- Not aware of any; would be nice to have a representative come on a quarterly basis to give people support
- Residents go to orientation after receiving a voucher that covers their rights
- There is no private fair housing organization, no education, no strong enforcement; landlords can discriminate with impunity
- 8. Are public resources (e.g. parks, schools, roads, police & fire services, etc.) invested in evenly throughout all neighborhoods?
 - The City is making a hard push to ensure public services are evenly provided and accessible
 - Generally fairly evenly distributed
 - If you live in East Winston, you have to go across town to get to a range of commercial services, medical services, and grocery stores; this is a long-standing problem
 - The suburbs are park and recreation poor
 - Police and community relations are good and have strengthened in past 20 years
 - Schools aren't easily accessible depending on where you live
 - They have closed central library and redirected to downtown. Downtown has very few children's books. East Winston library doesn't have the resources.
 - Parks more parks in areas with substandard housing and lower income
 - Parks and rec centers are located throughout the city
 - Rec centers close at 6 and not open on the weekend; city council talking about the need for young people to have somewhere to go; asked for extended hours
 - Parks vary about what they have to offer
 - Swimming pools maintenance vary based on location
 - Forsyth Co neighborhood system segregated; schools aren't served equally based on the area
 - Disparities based on neighborhood exist
 - Police and fire is distributed equally
 - Parks are improving in different areas of town. Nice new playgrounds that aren't in "nice" parts of town. Can tell there has been effort made.
 - You don't hear about police brutality in Winston-Salem
 - Road conditions Off of Cleveland Avenue, needs better signage and fixes
 - DOT looks at congestion and areas of greatest need, which is often areas with higher development rates
 - City/County have policies to avoid and minimize impacts on existing neighborhoods as they do infrastructure projects; make a strong effort to inform neighbors
 - The City pushes resources into all areas equitably. The eight council wards help ensure balance in how investments are made.
 - Public resource investment is uneven: police and fire resources are greater in poor neighborhoods, bus stops are closer together. West wards are donors to the East.
 - If choosing between all failing schools, is it really a choice? All students should have a high performing school among their choices and transportation to get there.

- No, not at all even. Roads, stores, and restaurants are all better in some areas than others.
- No, investment of resources is not even. Comes down to the power of people to advocate for themselves and their communities.
- 9. Is there anything we haven't discussed that you feel is important to our research?
 - In the process of leveraging the redevelopment of another challenged area Peters Creek Parkway area. If successful, boost of affordable housing stock.
 - There's demand for multifamily housing even in the suburbs
 - The City needs to keep an eye on status of housing stock in older suburbs and be careful of deterioration of single family units
 - Housing's link to public health and family stabilization
 - The City has drastically reduced homelessness in 10 years
 - It would be cost effective to speed along the housing process to get the homeless off of the street and out of the ER
 - Winston-Salem has done a lot working on veterans' homelessness and poverty
 - There's a need to "move the needle" in more than just East Winston. There should be affordable housing in all areas.
 - More afterschool programs would help reduce the crime rate
 - Human Relations Dept does continuous outreach via TV and newsletters
 - Winston-Salem Building Integrated Communities started as a grant from Chapel Hill as a onestop-shop to connect immigrants to local resources
 - The state's QAP for tax credit allocation emphasizes proximity to a grocery store, which puts all of East Winston off limits no major chain grocery stores there.

Community Survey

The following includes a sample of questions and responses from the community survey. Complete results are provided as an appendix to this report.

- When asked to identify whether more housing is need in Winston-Salem and Forsyth County, most respondents (60%) said that a lot more housing affordable to low income households is needed. About half of respondents (48%) said that a lot more first time homebuyer assistance is needed. These were the two housing assistance types that survey takers most frequently identified as needing more in Winston-Salem and Forsyth County.
- Thinking about the provision of public resources in Winston-Salem and Forsyth County, more than half of respondents feel that water/sewer, fire protection, and garbage collection are equally provided throughout all areas. Resources that were most commonly perceived as not being equally provided include bus service (identified as unequally provided by 59% of respondents), schools (48%), and parks (40%). No other resources were considered to be unequally provided by more than 40% of survey takers.
- Just over half (53%) of respondents report understanding their fair housing rights. Similarly, half (52%) know where to file a discrimination complaint. Only 17% of survey takers said they do not understand their fair housing rights, but a higher share (38%) do not know where to file a discrimination complaint.

• Nineteen respondents (10%) experienced housing discrimination since living in Forsyth County. Landlords or property managers where the most frequent discriminators, impacting 15 out of 19 respondents (79%) who experienced discrimination, followed by mortgage lenders (5 out of 15 respondents or 26%). The most frequent bases for discrimination were race (11 out of 19 cases) and familial status (also 11 out of 19 cases).

Of the 19 survey participants who reported experiencing discrimination, only one made a report of it. Reasons for not reporting included not knowing what could it would do (identified by 6 out of 17 respondents), fear of retaliation (2 respondents), and the fact that sexual orientation is not a protected class under fair housing laws (2 respondents).

- Survey participants were asked whether they think housing discrimination is an issue in Winston-Salem and Forsyth County. Thirty percent (30%) said yes, it is an issue, and 32% said that it may be an issue. Ten percent (10%) of respondents did not see it as an issue, and the remaining 28% did not know.
- Asked to select any factors that are barriers to fair housing in Winston-Salem and Forsyth County, respondents identified the following as the top five impediments to fair housing:
 - Low income housing concentrated in a few areas (71% of respondents);
 - Lower incomes for African American, Latino, or other minority households (68%);
 - Residents not knowing their fair housing rights (63%);
 - Lower incomes for female householders (56%); and
 - Residents not knowing where to report housing discrimination (54%).

IV. Assessment of Past Goals, Actions & Strategies

5. Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents:

a. Discuss what progress has been made toward their achievement;

The Winston-Salem/Forsyth County Housing Consortium completed an Analysis of Impediments to Fair Housing Choice in 2013, in conjunction with preparation of its 2014-2018 Consolidated Plan. The AI identified seven fair housing barriers and related recommendations, listed below with the progress made to address them since 2013.

<u>Recommendation #1</u>: Educate community-at-large regarding the illegality of steering.

• Discussed illegality of steering during annual Fair and Affordable Housing Summit.

<u>Recommendation #2</u>: Focus on development of new outreach for the international populations in order to educate them about national origin discrimination.

- Disseminated community-oriented fair housing education materials in Spanish.
- Continued with Tu Comunidad newsletter and TV show.
- Partnered with Wake Forest University's School of Divinity to host religious forums to disseminate information on religious tolerance and discrimination to city and county staff.
- Partnered with community organizations through the Building Integrated Communities initiative. Developed the Newcomers' Pipeline, a one-stop-shop to provide local immigrant populations with information on fair and affordable housing, education, health care, transportation, language access, and related resources in Winston-Salem and Forsyth County. The City of Winston-Salem won the National League of Cities 2017 City Cultural Diversity Award for its Newcomers' Pipeline.

<u>Recommendation #3</u>: Develop outreach and marketing information for victims of domestic violence in order to educate them about their possible legal protections under fair housing laws.

• Partnered with Legal Aid, Inc. to explore ways of reaching out to victims of domestic violence and housing providers to educate about new HUD guidance related to domestic violence and fair housing.

<u>Recommendation #4</u>: Identify partner agencies in LGBTQIA, immigrant, and domestic violence communities to proactively identify and address barriers to fair and equal housing opportunity.

• See #3.

<u>Recommendation #5</u>: Continue fair housing testing within the local community until all protected classes have been tested.

• Conducted fair housing testing.

<u>Recommendation #6</u>: Develop creative media campaigns using social media, television, radio, and print media in order to reach younger segments of the community who are often not targeted for education awareness.

- Implemented Operation Community Awareness, a radio, television, and newspaper media campaign to raise visibility of Human Relations Department.
- Developed Fair Housing Media Campaign focused on the Human Relations Department's fair housing services, which led to an increase in the number of housing-related inquiries.

<u>Recommendation #7</u>: Continue to support and/or implement strategies concentrating on increasing local activities to identify and reduce barriers to fair and affordable housing choices in all areas of the City.

- Provided a variety of fair housing outreach activities during Fair Housing Month (April) and sponsored the annual Fair and Affordable Housing Summit for local housing industry professionals, with about 200 in attendance.
- Conducted home rehabilitation for low-income single-family homeowners.
- Funded construction of new affordable single-family units.
- Provided funding for development and redevelopment of affordable multifamily housing.
- Provided first-time homebuyer assistance; about 80% of participant households were African American.
- Supported Winston-Salem Regional Association of Realtors' annual American Dream Weekend to provide a one-stop-shop for first-time homebuyers.
- Funded the Center for Homeownership to provide homebuyer counseling and education (City of Winston-Salem).
- Operated Individual Development Account program to provide intensive financial literacy (Forsyth County).

b. Discuss how you have been successful in achieving past goals, and/or how you have fallen short of achieving those goals (including potentially harmful unintended consequences);

Winston-Salem and Forsyth County were particularly successful in addressing goals #2 (outreach to international populations), #6 (creative media campaigns), and #7 (increasing local activities to identify and reduce barriers to fair and affordable housing choice). In addition to disseminated fair housing information in Spanish through the Human Relations Department, the recently-developed Newcomers' Pipeline provides fair housing education for all immigrant groups. The Pipeline also expands immigrants' access to community resources such as affordable housing, education, health care, and transportation.

Creative marketing approaches – radio, television, newspaper, and other media efforts – to enhance public knowledge of the Human Relations Department and its fair housing services led to an increase in the number of housing-related inquiries since 2013.

The City and County offer a variety of programs to address affordable housing need, including assistance with single-family home rehabilitation, construction of single-family units, development and redevelopment of multifamily units, and assistance and education for first-time homebuyers.

The City and County also faced barriers to implementing some of the AI recommendations, including:

- Limited time to focus solely on the concept of steering as an education topic, given the Human Relations Department's numerous outreach campaigns intended to educate the community about the Fair Housing Act and its many facets;
- Limited time and resources the Human Relations Department can dedicated to creating new and innovative ways of reaching younger segments of the community;
- Limited budgetary resources to continue and increase Fair Housing Initiatives Program (FHIP) participation in testing; and
- Public opposition to multifamily and/or rental housing and zoning/land use regulations that often require rezoning (a legislative process with a public hearing) for multifamily housing.

c. Discuss any additional policies, actions, or steps that you could take to achieve past goals, or mitigate the problems you have experienced; and

The City identified two activities that could further their work around the goals of outreach to victims of domestic violence and identification of partner agencies in LGBTQIA, immigrant, and domestic violence communities:

- Identifying additional subject matter experts in the area of domestic violence to assist in creating targeted outreach and marketing information; and
- Developing a comprehensive plan on how to effectively partner with LGBTQIA, immigrant, and domestic violence communities.

d. Discuss how the experience of program participant(s) with past goals has influenced the selection of current goals.

The City of Winston-Salem and Forsyth County's extensive experience with fair housing education/enforcement, and local activities to reduce fair and affordable housing barriers informed selection of current goals, metrics, and timelines for implementation. With regard to fair housing education, the City notes that there is an increasing need for resources to conduct outreach to Winston-Salem's growing foreign-born population. There is a specific need to address various language barriers and cultural misinterpretations regarding fair housing rights.

The City also notes accommodation and accessibility issues, particularly for low- and moderateincome persons, with respect to affordable housing availability and choice in safe areas, which influenced selection of the goal related to accessibility and reasonable accommodation.

V. Fair Housing Analysis

A. Demographic Summary

1. Describe demographic patterns in the jurisdiction and region, and describe trends over time (since 1990).

The city of Winston-Salem has a population of about 222,000 residents, of which the largest share is non-Latino white (46.7%). About one-third of the city's population is non-Latino African American (34.3%) and about one-in-seven residents are Latino (14.8%). People of other races (Asian, Pacific Islander, Native American, multiple or other races) constitute less than 5% of city residents.

More than one-tenth of Winston-Salem's population is foreign-born (11.1%) and one-in-twelve people have limited English proficiency (LEP) (8.0%). For the foreign-born population, the top three countries of origin are Mexico, El Salvador, and Guatemala. Mexico alone accounts for more than half of Winston-Salem's immigrant population. Spanish is the language spoken by the vast majority of the city's LEP population (97.0%). Other common birth counties for foreign-born residents include India, Nicaragua, Philippines, China, Nigeria, Honduras, and Peru.

Forsyth County is less diverse than the city. Of the county's approximately 350,000 residents, 58.7% are non-Latino white. African American make up about one-quarter of the county's population, and Latinos comprise 11.9%. As in the city, other races have small population shares, with Asians, Pacific Islanders, Native Americans, and persons of other or multiple races collectively making up less than 4% of the county's total.

Foreign-born residents and persons with limited English proficiency make up slightly smaller shares of the county population than they do of the city. Nearly one-tenth of county residents were born outside the U.S. (9.3%) and one-in-fifteen speak limited English. Latin America (Mexico, El Salvador, Guatemala, Nicaragua, and Colombia) is the birthplace for most of the county's foreign-born population (62.1%). Other common birth countries include India, China, Philippines, Vietnam, and Germany. Like in the city, the large majority of the LEP population speaks Spanish (90.7%). Asian languages, including Chinese, Vietnamese, Korean, and others, are also common.

Diversity levels are further decreased at the regional level.¹ Of the Winston-Salem Region population, 70.4% is non-Latino white. Black residents make up only 17.1% of the region, and Latinos comprise 9.3%. Other racial groups (Asians, Pacific Islanders, Native Americans, other and multiple races) constitute 3.9% of the region. About 7% of the region's population was born outside the U.S. and about 5% has limited English proficiency. Top countries of origin and languages spoken are similar to those at the county level.

Since 1990, all three geographies (city, county, and region) became more racially and ethnically diverse. In the city of Winston-Salem, the African American population grew by 15.1% between 1990 and 2000 and by another 14.5% from 2000 to 2010. The Latino population expanded more than

¹ U.S. HUD defines the Winston-Salem, NC region as the following five counties: Forsyth, Stokes, Davie, Yadkin, and Davidson.

tenfold from 1990 to 2000, growing from 1,475 to 16,222 over the decade. It doubled between 2000 and 2010 to reach 33,323. The Asian population also grew over the last few decades, from a population of 1,215 to about 4,561 currently. Despite this large growth rate, Asians still make up a relatively small share of the city (2.1%). The city's white population decreased slightly each decade; by 4.2% from 1990 to 2000 and by 1.7% from 2000 to 2010.

In Forsyth County, the African American share of the population remained relatively constant at about 25% since 1990. Latino population, in contrast, grew considerably. In 1990, Latinos made up less than 1% of the county population; by 2010, their population grew by a factor of 20 to reach 41,752. As in the city, the county's Asian population had a significant growth rate (380.5% over the 1990 to 2010 period) but remained a small share of the county overall. Forsyth County's white population grew slowly since 1990 (at 5.3%) and lost overall population share. This loss was largely attributable to the growth in Latino population shares.

Regional population growth trends mimic those of Forsyth County. The African American population share remained stable at 17% since 1990. Latino population share grew substantially, from 0.2% in 1990 to 9.3% in 2010. Asian residents increased their numbers by a factor of 5 but remain less than 2% of the region's total population. The white population grew, but lost population share by about 11 percentage points.

Turning to other characteristics of the population, about one-tenth of residents in the city of Winston-Salem (10.9%) and in Forsyth County (10.8%) have one or more disabilities. In both geographies, ambulatory difficulties (i.e., serious difficulty walking or climbing stairs) were most common, affecting about 6% of the population. Independent living difficulties (i.e., difficulties doing errands alone such as visiting a doctor's office or shopping) and cognitive difficulties (i.e., difficulty remembering, concentrating, or making decisions) were the second and third most common disabilities, each affecting 4.4% of city residents and 4.3% of county residents. Regionally, the disability rate was slightly higher than in both the city and county, at 13.1%. Seven percent (7.3%) of the region's residents have an ambulatory difficulty, 5.1% have a cognitive difficulty, and 5.0% have an independent living difficulty.

About 53% of the population in the city of Winston-Salem are women and 47% are men, which is nearly identical to the breakdown in the county and region, with very little variation since 1990.

Looking now at age of the population, residents under the age of 18 make up just under one-quarter of the population in the city of Winston-Salem (24.6%), Forsyth County (24.4%), and the Winston-Salem Region (24.0%). Seniors age 65 and over comprise about one-in-eight residents in the city (12.4%) and county (13.0%), and slightly more in the region (14.0%). Only one of these shares varies by more than 2 percentage points since 1990. The youth (<18) population share in Winston-Salem was 22.0% in 1990 and grew steadily to 24.6% at present.

Families with children are most common in the city of Winston-Salem, where they make up 47.3% of family households (defined as households with two or more people related by birth, marriage, or adoption) and 30.6% of all households. They constitute progressively smaller shares of family households in the county (45.7%) and region (43.6%); the share of total households with children is steady at 30%. In the city, families with children as a share of family households grew by 3.2 percentage points since 1990; shares in the county and region changed by under 2 percentage points.

Table 1. Demographics										
	City of Winston-Salem			Forsyth	County		Winston-Salem Region			
Race/Ethnicity		#	%		#	%		#	%	
Non-Hispanic										
White		103,802	46.73%		205,934	58.73%		451,146	70.43%	
Black		76,166	34.29%		89,533	25.53%		109,416	17.08%	
Asian or Pacific Islander		4,561	2.05%		6,583	1.88%		9,008	1.41%	
Native American		541	0.24%		894	0.25%		1,838	0.29%	
Two or More Races		3,655	1.65%		5,255	1.50%		8,500	1.33%	
Other		514	0.23%		696	0.20%		1,005	0.16%	
Hispanic		32,889	14.81%		41,775	11.91%		59,682	9.32%	
National Origin										
#1 country of origin	Mexico	12,782	5.94%	Mexico	14,720	4.45%	Mexico	21,425	3.55%	
#2 country of origin	El Salvador	1,680	0.78%	El Salvador	2,077	0.63%	El Salvador	2,740	0.45%	
#3 country of origin	Guatemala	1,032	0.48%	India	1,429	0.43%	India	1,497	0.25%	
#4 country of origin	India	946	0.44%	Guatemala	1,186	0.36%	Guatemala	1,454	0.24%	
#5 country of origin	Nicaragua	558	0.26%	China	903	0.27%	China	1,029	0.17%	
#6 country of origin	Philippines	516	0.24%	Philippines	716	0.22%	Colombia	869	0.14%	
#7 country of origin	China	508	0.24%	Nicaragua	580	0.18%	Philippines	847	0.14%	
#8 country of origin	Nigeria	404	0.19%	Colombia	574	0.17%	Honduras	846	0.14%	
#9 country of origin	Honduras	382	0.18%	Vietnam	528	0.16%	Germany	727	0.12%	
#10 country of origin	Peru	348	0.16%	Germany	518	0.16%	Vietnam	718	0.12%	
Limited English Proficienc	y (LEP) Language									
#1 LEP Language	Spanish	16,765	7.79%	Spanish	19,582	5.92%	Spanish	26,854	4.45%	
#2 LEP Language	Other Asian Lang.	266	0.12%	Chinese	589	0.18%	Cambodian	665	0.11%	
#3 LEP Language	Chinese	256	0.12%	Other Asian Lang.	298	0.09%	Chinese	659	0.11%	
#4 LEP Language	Greek	207	0.10%	Vietnamese	280	0.08%	Vietnamese	348	0.06%	

Table 1. Demographics (continued)										
Limited English	City of W	inston-Sale	m		Forsyth County		Winston-Salem Region			
Proficiency (LEP)	Language	#	%				Language	#	%	
#5 LEP Language	Vietnamese	173	0.08%	Greek	279	0.08%	Other Asian Lang.	333	0.06%	
#6 LEP Language	French	137	0.06%	Italian	221	0.07%	Arabic	305	0.05%	
#7 LEP Language	Persian	134	0.06%	French	166	0.05%	Greek	292	0.05%	
#8 LEP Language	Tagalog	125	0.06%	Korean	144	0.04%	French	278	0.05%	
#9 LEP Language	Arabic	122	0.06%	Tagalog	139	0.04%	German	250	0.04%	
#10 LEP Language	Japanese	115	0.05%	Persian	134	0.04%	Italian	221	0.04%	
Disability Type										
Hearing difficulty		5,040	2.37%		8,456	2.58%		20,568	3.44%	
Vision difficulty		3,937	1.85%		5,751	1.76%		13,815	2.31%	
Cognitive difficulty		9,425	4.43%		14,074	4.30%		30,469	5.09%	
Ambulatory difficulty		13,554	6.37%		19,921	6.08%		43,669	7.30%	
Self-care difficulty		4,714	2.22%		7,170	2.19%		15,504	2.59%	
Independent living difficulty		9,480	4.46%		14,303	4.37%		29,623	4.95%	
Sex										
Male		104,347	46.98%		166,419	47.46%		308,353	48.14%	
Female		117,781	53.02%		184,251	52.54%		332,242	51.86%	
Age										
Under 18		54,549	24.56%		85,401	24.35%		153,483	23.96%	
18-64		139,997	63.03%		219,758	62.67%		397,568	62.06%	
65+		27,582	12.42%		45,511	12.98%		89,544	13.98%	
Family Type										
Families with children		25,402	47.33%		41,310	45.67%		75,326	43.58%	

Note: All % represent a share of the total population within the jurisdiction or region, except family type, which is out of total families.

Data Sources: Decennial Census; ACS

Table 2. Demographic Trends													
	City of Winston-Salem						Forsyth County						
	1990		2000		2010		1990		2000		2010		
Race/Ethnicity	#	%	#	%	#	%	#	%	#	%	#	%	
White, Non-Hispanic	117,669	65.05%	112,675	55.82%	110,806	48.18%	195,394	73.55%	202,098	66.08%	205,719	58.71%	
Black, Non-Hispanic	59,916	33.12%	68,964	34.17%	78,994	34.35%	65,777	24.76%	78,307	25.60%	92,828	26.49%	
Hispanic	1,475	0.82%	16,222	8.04%	33,323	14.49%	2,049	0.77%	19,531	6.39%	41,752	11.92%	
Asian or Pacific Islander, Non-Hispanic	1,215	0.67%	2,545	1.26%	5,258	2.29%	1,588	0.60%	3,682	1.20%	7,631	2.18%	
Native American, Non-Hispanic	349	0.19%	847	0.42%	1,031	0.45%	487	0.18%	1,345	0.44%	1,672	0.48%	
National Origin													
Foreign-born	3,437	1.90%	15,615	7.75%	23,741	10.33%	4,652	1.75%	19,819	6.49%	30,520	8.72%	
LEP													
Limited English proficiency	2,263	1.25%	12,112	6.01%	18,633	8.11%	3,152	1.19%	15,167	4.96%	22,982	6.56%	
Sex													
Male	83,868	46.36%	95,279	47.21%	104,347	46.98%	125,253	47.15%	146,055	47.76%	166,419	47.46%	
Female	97,035	53.64%	106,546	52.79%	117,781	53.02%	140,376	52.85%	159,749	52.24%	184,251	52.54%	
Age													
Under 18	39,802	22.00%	48,461	24.01%	54,549	24.56%	60,464	22.76%	74,929	24.50%	85,401	24.35%	
18-64	116,935	64.64%	125,659	62.26%	139,997	63.03%	172,791	65.05%	191,891	62.75%	219,758	62.67%	
65+	24,166	13.36%	27,705	13.73%	27,582	12.42%	32,374	12.19%	38,984	12.75%	45,511	12.98%	
Family Type													
Families with children	21,091	44.11%	17,799	46.74%	25,402	47.33%	33,242	45.41%	26,285	46.61%	41,310	45.67%	

Note: All % represent a share of the total population within the jurisdiction or region for that year, except family type, which is out of total families.

Data Sources: Decennial Census; ACS

2. Describe the location of homeowners and renters in the jurisdiction and region, and describe trends over time.

According to 2011-2015 American Community Survey data, the majority of households in Winston-Salem, Forsyth County, and the Winston-Salem Region are homeowners. In the city, 54.4% of households own their homes and 45.6% rent. Ownership rates are higher in the county, where just under two-thirds of households own their homes (62.1%). Regionally, slightly more than two-thirds of households are owners (67.6%), and just under one-third (32.4%) are renters.

The homeownership rate in the city declined only slightly since 2000, when it was 55.8%. The county and region saw somewhat more pronounced declines in homeownership rates, which both fell by 3.5 percentage points since 2000 (the county from 65.6% to 62.1% and the region from 71.1% to 67.6%.

The maps that follow show the share of owners and renters by census tract in Forsyth County. Within the city of Winston-Salem, homeownership is most prevalent in several tracts on the west side along Silas Creek Parkway/Highway 67 and Peace Haven Road at Robinhood Road and Country Club Road. Several tracts at the city limits also have high homeownership rates, including two in the city's southern portion along US-52 at West Clemmonsville Road, one in the north along Old Rural Hall Road containing Maple Chase Country Club, several in the west near Pfafftown, and one in the east along Kernersville Road at Sedge Garden Road. Homeowners make up more than 80% of households in these areas.

Within Winston-Salem, rental households are most common in downtown and east of downtown, including a group of tracts bordered by Main Street to the west, I-40 to the south, Martin Luther King, Jr. Drive and New Walkertown Road to the east, and Smith Reynolds Airport to the north. Other tracts with high shares of renters include two tracts just north of Wake Forest University along University Parkway, one at I-40 and Peters Creek Parkway, and two north of the I-40 and Hwy 421 interchange. More than two-thirds on households in each of these areas are renters.

At the county level, there are no census tracts where renters make up more than two-thirds of households. Unincorporated areas of Forsyth County typically have high shares of homeowners. More than 80% of households are owners in the unincorporated area north of Winston-Salem and Walkertown and east of Rural Hall, the tracts west of Winston-Salem (including parts of Lewisville), and one tract in Clemmons.

Regionally, homeownership predominates. In Stokes County (to Forsyth County's north) and Yadkin and Davie Counties (to the west), no tract has a homeownership rate below 68%; most are over 80%. Only Davidson County has tracts where the homeownership rate falls under 68% - specifically, around Lexington and Thomasville.

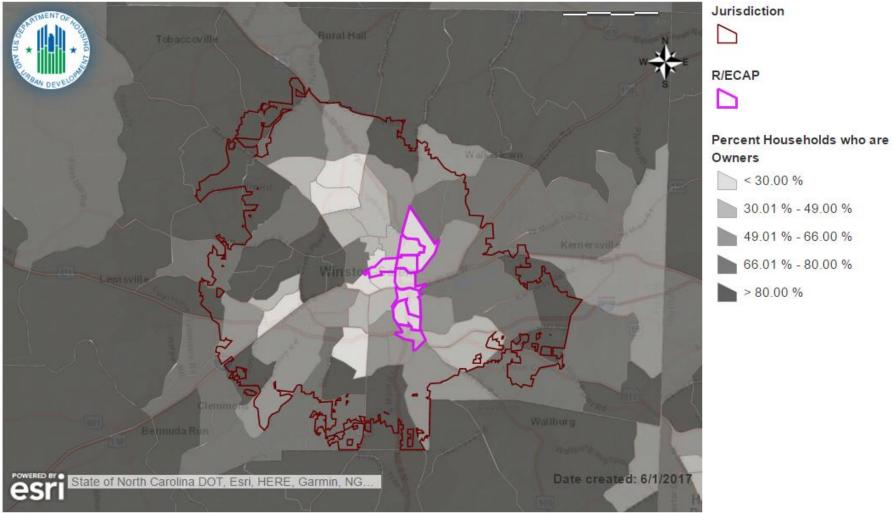


Figure 1. Share of Households that are Owners in the City of Winston-Salem and Forsyth County

Name: Map 16 - Housing Tenure

Description: Housing Tenure by Owners with R/ECAPs

Jurisdiction: Winston-Salem (CDBG, ESG)



Figure 2. Share of Households that are Renters in the City of Winston-Salem and Forsyth County

Name: Map 16 - Housing Tenure

Description: Housing Tenure by Renters with R/ECAPs

Jurisdiction: Winston-Salem (CDBG, ESG)

B. General Issues

i. Segregation/Integration

3. Analysis

a. Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.

The Dissimilarity Index (DI) indicates the degree to which a minority group is segregated from a majority group residing in the same area because the two groups are not evenly distributed geographically. The DI methodology requires a pair-wise calculation between the racial and ethnic groups in the region. Evenness, and the DI, are maximized and segregation minimized when all small areas have the same proportion of minority and majority members as the larger area in which they live. Evenness is not measured in an absolute sense, but is scaled relative to the other group. The DI ranges from 0 (complete integration) to 100 (complete segregation). HUD identifies a DI value below 41 as low segregation, a value between 41 and 54 as moderate segregation, and a value of 55 or higher as high segregation.

The proportion of the minority population group can be small and still not segregated if evenly spread among tracts. Segregation is maximized when no minority and majority members occupy a common area. When calculated from population data broken down by race or ethnicity, the DI represents the proportion of minority members that would have to change their area of residence to achieve a distribution matching that of the majority, or vice versa.

The table below shares dissimilarity indices for four pairings in the city of Winston-Salem, Forsyth County, and the Winston-Salem Region. As of 2010, segregation levels within the city were moderate for three pairings: White and Black residents (DI = 50.46), white and Latino residents (DI = 49.22), and white and non-white residents (DI = 46.15).

In Forsyth County, segregation levels were also moderate for these three pairings: Black and white residents had a DI of 52.99, Latino and white residents had a DI of 50.33, and white and non-white residents had a DI of 47.68. In both the city and county, segregation between white and Asian residents was low, at 25.15 and 27.04, respectively.

Regional segregation is higher than in the city and county for three of the four pairings. The regional white/Black dissimilarity index of 56.64 is the highest of any pairing and geography examined here. White/non-white segregation is higher in the region (50.08) than in the county (47.68), which is slightly higher than city levels (46.15). Asian/white segregation follows a similar pattern, although at lower DI levels and with more pronounced differences: regional DI of 40.33, county DI of 27.04, and city DI of 25.15. In contrast, Latino/white dissimilarity is relatively constant in each geograpy, from 49.00 in the region to 50.33 in the county.

Table 3. Racial/Ethnic Dissimilarity Trends									
Race/Ethnicity Dissimilarity Index	City of Winston-Salem			Forsyth County			Winston-Salem Region		
	1990	2000	2010	1990	2000	2010	1990	2000	2010
Non-White/White	59.45	52.86	46.15	60.59	54.12	47.68	59.31	54.30	50.08
Black/White	62.13	56.11	50.46	63.80	58.43	52.99	62.84	60.39	56.64
Hispanic/White	26.11	54.01	49.22	26.00	54.68	50.33	27.85	50.86	49.00
Asian or Pacific Islander/White	30.69	26.71	25.15	33.33	26.78	27.04	43.46	39.18	40.33

Data Sources: Decennial Census

b. Explain how these segregation levels have changed over time (since 1990).

This examination of segregation levels over time relies on dissimilarity indices calculated from tract level data from the 1990, 2000, and 2010 census, as provided in the previous table. In the city of Winston-Salem, segregation was reduced for three of the four pairings from 1990 to 2000 and 2000 to 2010. Black/white dissimilarity fell from 62.13 in 1990 to 50.46 in 2010. Dissimilarity indices between non-white and white residents and Asian and white residents also fell progressively over those two decades.

In contrast, dissimilarity indices increased for Latino and white residents. In 1990, when Latino residents made up only 0.8% of the city's population, segregation was low (DI = 26.11). By 2000, when Latinos made up 8.0% of the city, segregation reached a high level (DI = 54.01). If Latino immigrants behaved as many growing minority groups do, they would have moved into areas of the city predominately settled by people of their own ethnicity. The present data strongly suggests that the adoption of 11 times as many Latino immigrants as the then current population occurred in proximate areas. The expansion of existing Latino settlements was likely the primary force increasing the dissimilarity index between 1990 and 2000. This conclusion does not mean that there was no housing discrimination against Latinos; no metropolitan areas in the country was discrimination-free. But, the fact that the population grew so substantially masks less visible discriminatory dynamics. By 2010, the dissimilarity index between white and Latino residents moved to the moderate range at 49.22.

Similar trends occurred in Forsyth County over the decades from 1990 to 2010. Most pronounced declines were in non-white/white segregation, which moved from a high level of segregation in 1990 (DI = 60.59) to a moderate level in 2010 (DI = 47.68). Black/white dissimilarity indices fell by 10.81 points to 52.99 in 2010. Although always in the low range, Asian/white segregation was reduced from a DI of 33.33 in 1990 to 27.04 in 2010. As in the city of Winston-Salem, levels of Latino/white segregation in Forsyth County grew considerably from 1990 to 2000 as the Latino population expanded rapidly (the DI of 26.00 more than doubled to reach 54.68). Through 2010, segregation levels stabilized and were reduced slightly (DI = 50.33).

Regional changes in segregation levels from 1990 to 2010 mirrored the directionality of those at the city and county. Dissimilarity indices for non-white/white, Black/white, and Asian/white pairings declined, although at less pronounced levels than in Winston-Salem and Forsyth County. Segregation amongst white and Latino residents grew from 1990 to 2000 and then remained relatively constant through 2010.

A recent research paper by Wake Forest University student Drew Finley traces the history of racial segregation in Winston-Salem to the time before the communities of Winston and Salem were one. He reports that Salem was hospitable to African-Americans and generally had integrated living patterns, while Winston was highly segregated with many Black residents not moving to the city until the rise of the tobacco industry there. In 1913, the same year that Winston and Salem merged, William Darnell, a Black man, was arrested for violating a city ordinance forbidding people from moving onto blocks where they would be in the racial minority. The North Carolina Supreme Court ultimately invalidated the ordinance, and in following years, as African-Americans moved into East Winston, whites moved out. In the 1960s, expansion of Highway 52 through urban renewal led to the bulldozing of several mainly Black neighborhoods and further

divided downtown Winston-Salem from East Winston. By 1974, Winston-Salem was ranked as one of the most segregated city. according to a University of Wisconsin analysis of census data in 100 U.S. cities.²

c. Identify areas with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.

The maps that follow identify population by race and ethnicity by census tract in Winston-Salem and Forsyth County. They also include maps that identify foreign-born population and persons with limited English proficiency by tract.

Looking first at segregation and integration by race and ethnicity, the maps reveal that the majority of Winston-Salem's white residents live west of US-52. East of US-52, there is a concentration of white residents living at the eastern city limits near I-40 and Kernersville Road. African American residents live predominantly within three areas of the city: east of US-52, south of I-40, including near the I-40 and US-421 interchange, and in tracts lying to the east of I-52 that extend from north of downtown to Bethania. Latino residents live in somewhat similar areas, including around US-52, east of US-52, south of I-40, and in the northwest portion of the city.

Countywide, most African American and Latino residents live in incorporated areas, including Winston-Salem, Kernersville, Clemmons, Lewisville, and Rural Hall. There are fewer non-white residents in unincorporated Forsyth County.

Visually it can be seen that areas of greatest integration include:

- A group of tracts in northwest Winston-Salem, north of Wake Forest University and west of US-52, around Bethabara Park Boulevard and Shattalon Drive;
- A group of tracts in south Winston-Salem, south of I-40, along Ebert Road, US-52, and Thomasville Road; and
- An area in and near Rural Hall bounded by US-52 on the west, Germanton Road on the east, and Highway 65 to the north.

As of the 2010 Census, Rural Hall is the most diverse town in Forsyth County outside of Winston-Salem. White residents comprise 68.6% of its population, African Americans make up 15.5%, and Latino constitute 13.5%. Kernersville follows with a population that is 74.0% white, 12.4% Black, and 9.7% Latino.

Turning to national origin, the map shows residency patterns in Forsyth County for the five most common countries of origin for the foreign-born population. By far, most of the county's foreign-born residents live in Winston-Salem. Most immigrants reside within two generally areas of the city: south of the I-40 business route between Ebert Roade and US-311 and in the northwest part of the city around US-52 and along Bethabara Park Boulevard, Shattalon Drive, and Indiana Avenue.

² Findley, Drew. "Persistent Inequality: Residential Segregation and the Curse of Bigness." 2016. Student paper for Wake Forest University's Special Topics in Cultural Studies course.

As the last map shows, residency patterns for people with limited English proficiency closely follows those of foreign-born groups. Spanish speakers – the language spoken by most LEP groups in the county and city – reside primarily in Winston-Salem, particularly in its southern and northwestern portions.

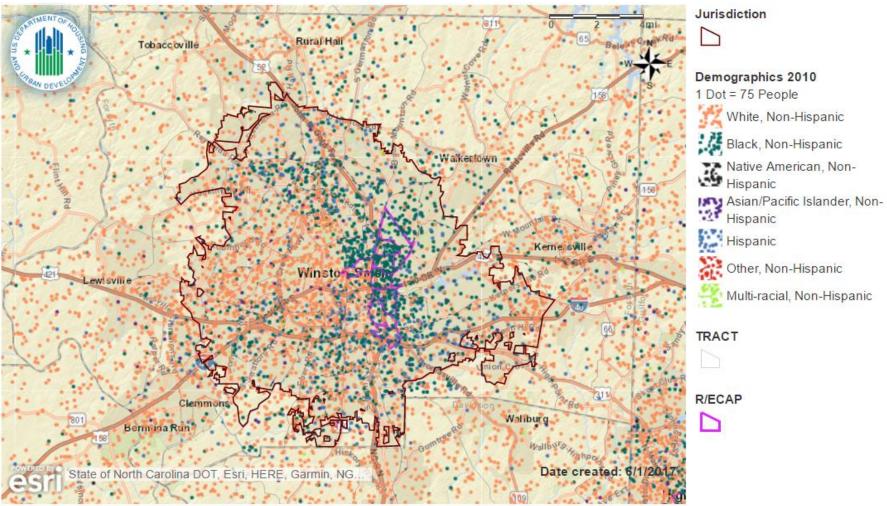


Figure 4. Population by Race and Ethnicity in the City of Winston-Salem and Forsyth County, 2010

Name: Map 1 - Race/Ethnicity

Description: Current race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs **Jurisdiction:** Winston-Salem (CDBG, ESG)

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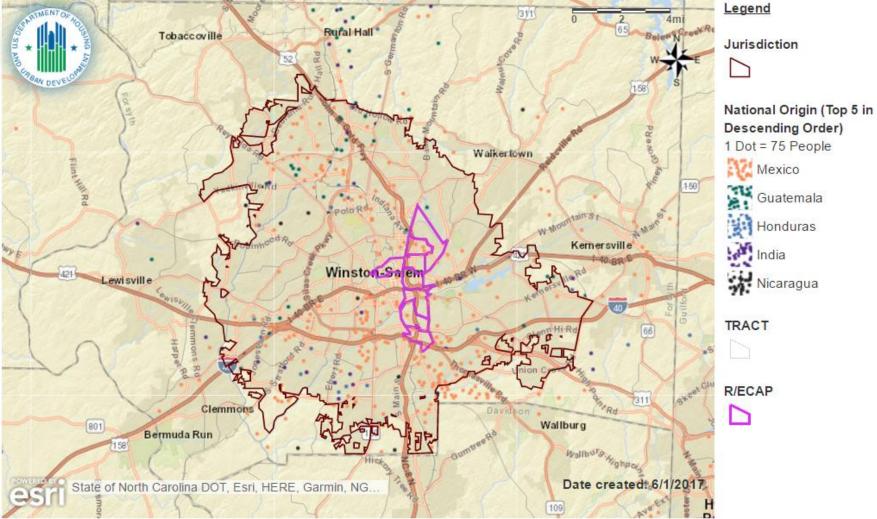


Figure 5. Foreign-born Population by Nationality in the City of Winston-Salem and Forsyth County

Name: Map 3 - National Origin

Description: Current national origin (5 most populous) dot density map for Jurisdiction and Region with R/ECAPs **Jurisdiction:** Winston-Salem (CDBG, ESG)

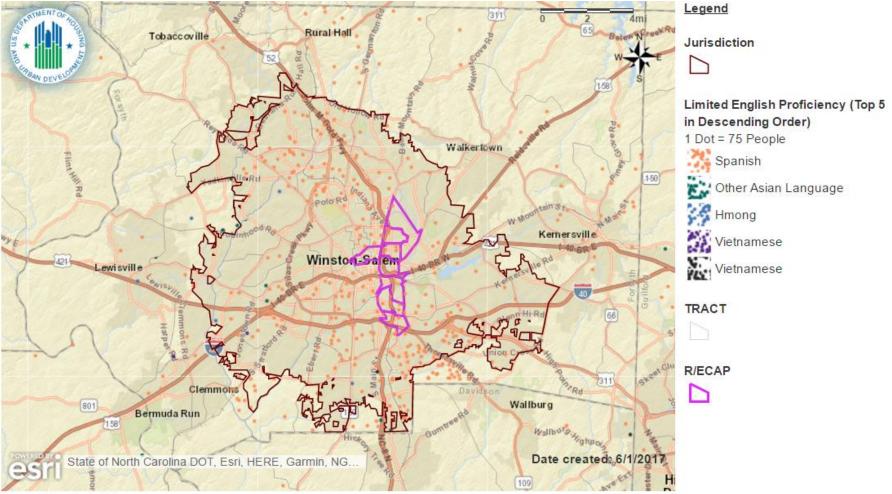


Figure 6. Persons with Limited English Proficiency in the City of Winston-Salem and Forsyth County

Name: Map 4 - LEP

Description: LEP persons (5 most commonly used languages) for Jurisdiction and Region with R/ECAPs **Jurisdiction:** Winston-Salem (CDBG, ESG)

d. Consider and describe the location of owner and renter occupied housing in determining whether such housing is located in segregated or integrated areas.

As discussed in the Demographic Summary, owner-occupied housing is most prevalent in west Winston-Salem, including census tracts along Silas Creek Parkway/Highway 67 and Peace Haven Road at Robinhood Road and Country Club Road. Areas in south Winston-Salem along US-52 at West Clemmonsville Road, in north Winston-Salem along Old Rural Hall Road, in west Winston-Salem near Pfafftown, and east Winston-Salem near Kernersville Road all have high rates of homeownership, as does unincorporated areas of the county.

Of the areas with high homeownership rates, those along Silas Creek Parkway, near Pfafftown, and along Kernersville Road are relatively segregated, with predominantly white populations. Likewise, unincorporated Forsyth County tracts have high homeownership rates and are segregated with majority white populations. The areas along Old Rural Hall Road and US-52/ West Clemmonsville Road have high rates of homeownership but are more integrated.

Renter households are most common in Winston-Salem, specifically in downtown and East Winston, in the area north of Wake Forest University along University Parkway, and north of the I-40 and Hwy 421 interchange. The first areas – downtown and East Winston – are segregated and predominantly African American. The areas north of Wake Forest University and at the I-40 and Hwy 421 interchange are more integrated.

e. Discuss how patterns of segregation have changed over time (since 1990).

The maps that follow provide racial and ethnic composition by census tract for Winston-Salem and Forsyth County in 1990 and 2000. They show that the current segregation patterns, particularly with respect to white and African American segregation along US-52, have existed for decades. Community input from residents and other stakeholders echoes the empirical data, with many people mentioning that US-52 has long been a dividing line between white and Black neighborhoods in Winston-Salem.

The maps also indicate growing levels of diversity in some parts of Forsyth County outside of Winston-Salem, particularly Rural Hall and Kernersville. Unincorporated Forsyth County was segregated in 1990 and 2000 and remains so today; tracts there are majority white and have low shares of people of color relative to the county overall.

The maps also show that more integrated areas, including several tracts in south Winston-Salem and northwest Winston-Salem, existed as far back as 1990 and have generally remained stable over the 20-year period. Tracts in south and southwest Winston-Salem became more diverse over that time frame, with African American population shares in several tracts increasing from 2000 to 2010.

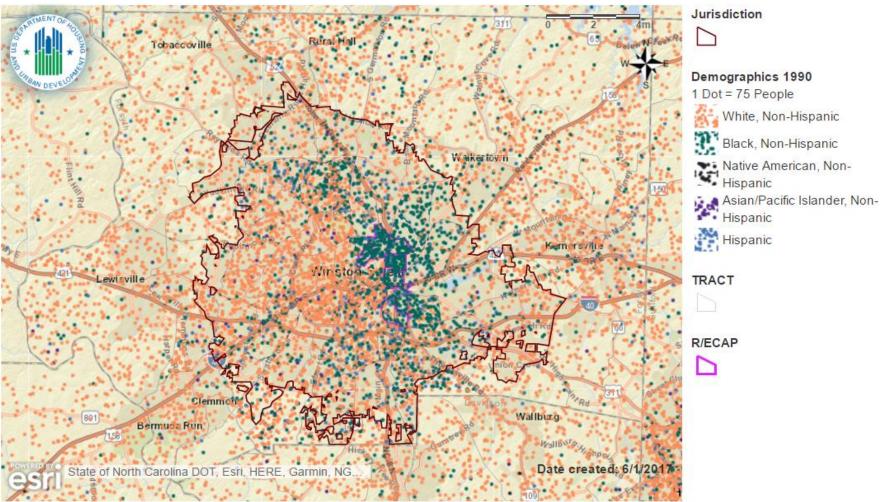


Figure 7. Population by Race and Ethnicity in the City of Winston-Salem and Forsyth County, 1990

Name: Map 2 - Race/Ethnicity Trends

Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Winston-Salem (CDBG, ESG)

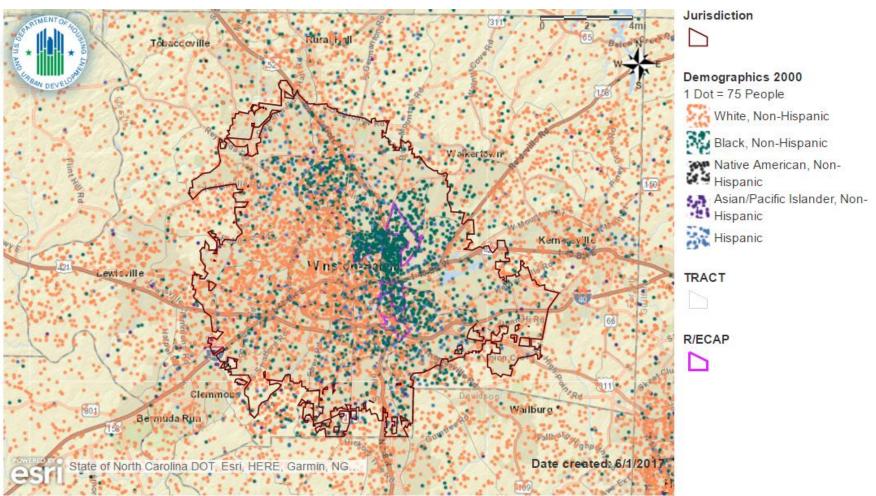


Figure 8. Population by Race and Ethnicity in the City of Winston-Salem and Forsyth County, 2000

Name: Map 2 - Race/Ethnicity Trends

 $\textbf{Description:} \ \texttt{Past} \ \texttt{race} / \texttt{ethnicity} \ \texttt{dot} \ \texttt{density} \ \texttt{map} \ \texttt{for} \ \texttt{Jurisdiction} \ \texttt{and} \ \texttt{Region} \ \texttt{with} \ \texttt{R} / \texttt{ECAPs}$

Jurisdiction: Winston-Salem (CDBG, ESG)

f. Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future.

While Winston-Salem and Forsyth County's populations became more diverse over the last two decades, dissimilarity indices indicate that most racial and ethnic groups are generally less segregated from one another in 2010 than they were in 1990. Segregation levels between Latino and white residents are an exception; they increased between 1990 and 2000 as the Latino population experienced rapid growth, and then declined through 2010 as the growth rate slowed. Assuming these overall demographic trends continue, the city and county would become less segregated, even as their populations become more diverse.

As downtown Winston-Salem becomes an increasingly attractive residential location, higherpriced residential developments have the potential to impact affordability and segregation levels there. To address rising housing costs in downtown, the City of Winston-Salem has focused on supporting affordable and mixed-income projects in the area.

More generally, policies and practices with regard to the siting of subsidized housing and the use of housing choice vouchers have the potential to impact segregation levels in the future, but those impacts should primarily be to decrease or have no effect on segregation rather than to increase it. Additionally, affirmative marketing practices provide another tool that can help avoid perpetuating segregated living patterns.

4. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about segregation in the jurisdiction and region affecting groups with other protected characteristics.

A few interview participants noted that housing discrimination against undocumented immigrants is an ongoing issue in the community. One participant also noted religious discrimination against Muslims, commenting that it has increased within the last 3 to 4 years. Community input identified racial and ethnic segregation as the primary form of segregation present in Winston-Salem and Forsyth County. Most meeting and interview participants noted that US-52 is, in effect, a dividing line between white and African American communities in Winston-Salem. Several community members cited historical practices, economic conditions, locations of lower-cost housing, and mental barriers in terms of where Winston-Salem residents consider as options to live as drivers of segregation. Others identified more direct reasons, such as redlining or steering by real estate agents.

b. The program participant may also describe other information relevant to its assessment of segregation, including activities such as place-based investments and mobility options for protected class groups.

The City of Winston-Salem and local community organizations have made specific efforts to address segregation and the role of US-52 as a dividing line within the city. The City has efforts underway to use infrastructure and physical design to lessen US-52's role as a barrier between downtown and East Winston. The development of the Wake Forest Innovation Quarter, on land along U.S. 52 that was formerly R.J. Reynolds Tobacco Company factories, has the potential to

change the dynamic. The Innovation Quarter is a place for research, business, and education in biomedical science, information technology, digital media, clinical services, and advanced materials. The Innovation Quarter currently comprises 1.8 million square feet of office, laboratory, and educational space on its 145 developable acres. In addition, there are approximately 80 apartments and condominiums within or close by the Innovation Quarter.

The community has also focused on programs and initiatives to bring together diverse populations in the city, including Project CommUnity in the 1970s, the Crossing 52 Initiative and the Institute for Dismantling Racism in the early 2000s, and, more recently, the Beyond Soul and Salsa initiative designed to increase interaction and dispel stereotypes between Latino and African American communities.

Please see the discussion of mobility options and place-based investments included in Question 2 of the Racially and Ethnically Concentrated Areas of Poverty section.

5. Contributing Factors of Segregation

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of segregation.

Priority Contributing Factors

- Lack of community revitalization strategies
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Location and type of affordable housing

Non-Priority Contributing Factors

- Community opposition
- Lending discrimination

ii. Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs)

1. Analysis

a. Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction.

This study uses a methodology developed by HUD that combines demographic and economic indicators to identify racially or ethnically concentrated areas of poverty (R/ECAPs). These areas are defined as census tracts that have an individual poverty rate of 40% or more (or an individual poverty rate that is at least 3 times that of the tract average for the metropolitan area, whichever is lower) and a non-White population of 50% or more.

As of 2010, the city of Winston-Salem contained eight contiguous R/ECAP census tracts (tracts 2, 5, 6, 7, 8.01, 8.02, 16.02, and 19.01). As the map that follows shows, this grouping lies along US-52 stretching from the Smith Reynolds Airport in the north to I-40 in the south. It is roughly bounded on the east by Martin Luther King, Jr. Boulevard and New Walkertown Road and on the west by Main Street, Salem College, and US-52. It contains much of the East Winston

neighborhood and the Winston-Salem State University campus. One tract in the R/ECAP grouping lies wholly to the west of US-52. This area is bounded by E. Northwest Boulevard to the north, Hanes Park to the west, and W. 8th Street to the south.

There are no other R/ECAP tracts in Winston-Salem and none in Forsyth County outside of Winston-Salem.

b. Which protected classes disproportionately reside in R/ECAPs compared to the jurisdiction and region?

The Winston-Salem R/ECAP grouping contains 34,035 residents (as shown in the table that follows). Both Black and Latino residents are disproportionately likely to reside in an R/ECAP. African Americans make up 65.0% of the R/ECAP population but only 34.3% of population in the city, 25.5% of the county, and 17.1% of the region. Latinos comprise 20.5% of R/ECAP population, compared to 14.8% of the city, 11.9% of the county, and 9.3% of the region. Relative to whites in the city of Winston-Salem, African Americans are 7.25 as likely to live in an R/ECAP; Latinos are 5.5 times as likely to do so.

More than half of families living in an R/ECAP have children (51.2%). This share is somewhat disproportionate to the share citywide (47.3%), and the difference becomes more pronounced at larger geographies (45.7% in the county and 43.6% in the region).

Of the top ten foreign-born population groups living in an R/ECAP, only one is disproportionate compared to the county and region. Mexican-born people make up 6.7% of the R/ECAPs, compared to 4.5% of Forsyth County and 3.6% of the Winston-Salem region.

Table 4. R/ECAP Demographics							
D/ECAD Dogo/Ethnisity	City of Winston-Salem						
R/ECAP Race/Ethnicity		#	%				
Total population in R/ECAPs		34,035	-				
White, Non-Hispanic		4,025	11.83%				
Black, Non-Hispanic		22,129	65.02%				
Hispanic		6,990	20.54%				
Asian or Pacific Islander, Non-Hispanic		155	0.46%				
Native American, Non-Hispanic		98	0.29%				
Other, Non-Hispanic		93	0.27%				
R/ECAP Family Type		#	%				
Total families in R/ECAPs		7,192	-				
Families with children		3,682	51.20%				
National Origin	Country	#	%				
Total population in R/ECAPs		34,035	-				
#1 country of origin	Mexico	2,272	6.67%				
#2 country of origin	El Salvador	82	0.24%				
#3 country of origin	Guatemala	78	0.23%				
#4 country of origin	Honduras	57	0.17%				
#5 country of origin	Cuba	32	0.09%				
#6 country of origin	Korea	29	0.09%				
#7 country of origin	Ecuador	21	0.06%				
#8 country of origin	Nicaragua	20	0.06%				
#9 country of origin	Russia	18	0.05%				
#10 country of origin	India	16	0.05%				

Source: Decennial Census; ACS

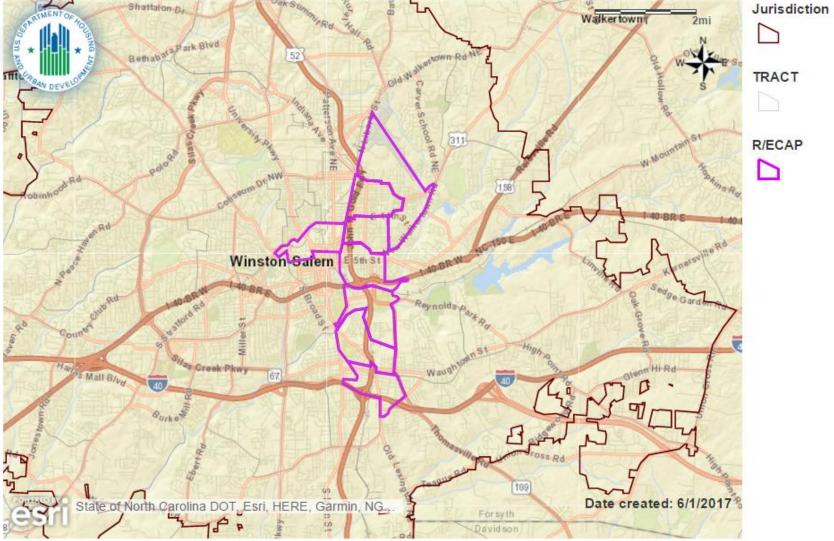


Figure 9. Racially and Ethnically Concentrated Area of Poverty in the City of Winston-Salem and Forsyth County, 2010

Name: Map 1 - Race/Ethnicity

Description: Current race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs **Jurisdiction:** Winston-Salem (CDBG, ESG)

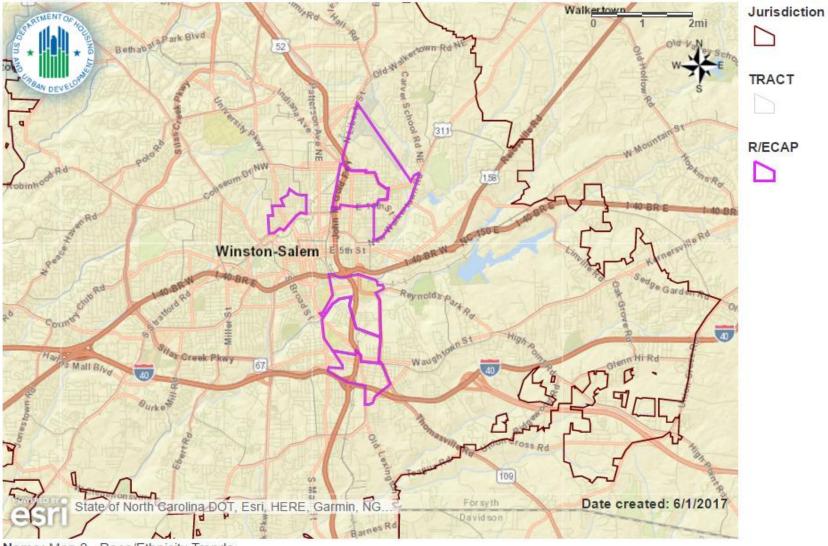


Figure 10. Racially and Ethnically Concentrated Areas of Poverty in the City of Winston-Salem and Forsyth County, 2000

Name: Map 2 - Race/Ethnicity Trends

Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Winston-Salem (CDBG, ESG)

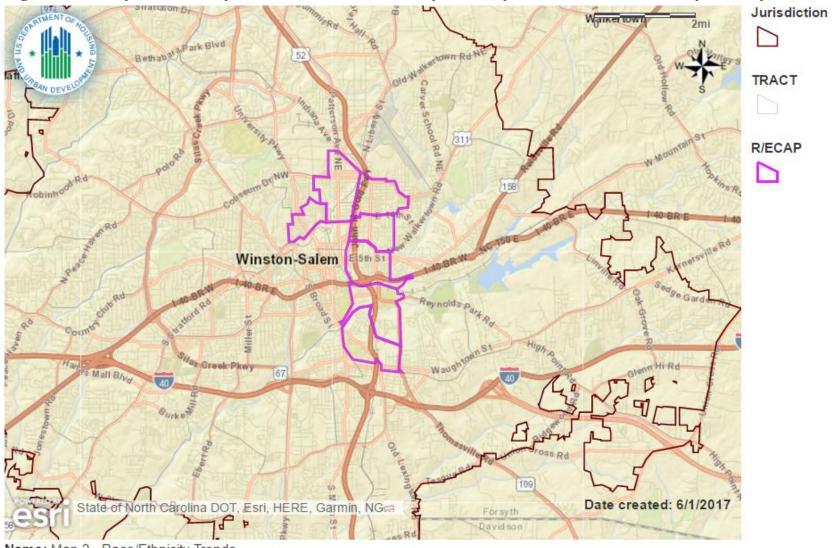


Figure 11. Racially and Ethnically Concentrated Areas of Poverty in the City of Winston-Salem and Forsyth County, 1990

Name: Map 2 - Race/Ethnicity Trends

Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Winston-Salem (CDBG, ESG)

c. Describe how R/ECAPs have changed over time (since 1990).

The maps shown on previous pages identify R/ECAPs in 1990, 2000, and 2010. They indicate that this area has a history of high-poverty and settlement primarily by households of color. The racial composition maps from the previous section show that African Americans made up the majority of R/ECAP population.

Small variations in R/ECAP geography did occur between 1990 and 2010. In 1990, the R/ECAP grouping was bounded on the north by Indiana Avenue and E. 25th Street and on the south by E. Sprague Street. By 2000, these boundaries extended to the airport on the north and I-40 on the south.

In 2000, tracts in East Winston from the E. 14th Street on the north to the I-40 business route on the south did not qualify as R/ECAPs, though they did in 1990 and would regain that status in 2010. During this time, the City of Winston-Salem put considerable effort and resources into adopting Redevelopment Plans for Redevelopment Areas, acquiring and demolishing property, and developing single-family owner-occupied housing for low- and moderate-income households. There were also slight changes in R/ECAP boundaries for the areas west of US-52, due in part to changing census tract boundaries over the decades.

The R/ECAPs on University Parkway and Patterson Avenue contain the Neal Place Redevelopment Area and Kimberly Park Terrace HOPE VI area, both of which reduced poverty in the area by 2010. Since 2010, census tract 2, the northern section of downtown Winston-Salem, has seen significant construction of market-rate housing, and the City of Winston-Salem has provided financing for two developments on condition that 10% and 25% of units, respectively, be affordable housing.

2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about R/ECAPs in the jurisdiction and region affecting groups with other protected characteristics.

Along with African Americans, Latinos, and families with children, members of two other protected classes are disproportionately affected by R/ECAPs. According to the Census Bureau's 2011-2015 five-year American Community Survey estimates, 14.2% of R/ECAP residents have a disability, which is above the city- and countywide shares of 10.8% and 10.9%, respectively.

Female householders are also more likely to live in an R/ECAP. Fifty-eight percent (57.7%) of R/ECAP households have a female householder, compared to 39.5% of Winston-Salem and 34.8% of Forsyth County.

b. The program participant may also describe other information relevant to its assessment of R/ECAPs, including activities such as place-based investments and mobility options for protected class groups.

The City of Winston-Salem, Forsyth County, HAWS, and other partners have made and continue to make significant place-based investments in R/ECAP neighborhoods. The R/ECAP grouping falls within the Winston-Salem/Forsyth County Housing Consortium's Neighborhood Revitalization Strategy Area (NRSA), which was established in 2000 and is targeted for certain

rehabilitation and economic development programs funded through CDBG and HOME grants. The 2014-2018 Consolidated Plan outlines specific strategies for the NRSA, including: loans to assist with single-family home rehabilitation by owner-occupants; improvements of commercial and industrial buildings through streetscaping, façade improvements, sidewalk replacement, and other aesthetic improvements; technical and financial assistance for small businesses; and real property development. Since 2014, the City and County have completed homeowner rehabilitation, homebuyer assistance, multifamily rehabilitation, and public facility projects within the R/ECAPs.

In addition to these investments, HAWS also undertook a significant master planning effort for the Cleveland Avenue neighborhood through a HUD Choice Neighborhoods Planning Grant. The Cleveland Avenue Neighborhood Transformation Plan was approved by HUD in May 2016, and top priorities identified by Cleveland Avenue neighborhood residents include access to quality housing, access to jobs, and improved outcomes for children. HAWS subsequently applied for a Choice Neighborhoods Implementation Grant. While the implementation grant was not awarded, HAWS has begun and continues to look for ways to achieve the goals and fund the activities outlined in the plan. HAWS completed construction of The Oaks at Tenth (50 units) in 2014 and Camden Station (30 units) in 2016. Both are "Step-Up" public housing locations to help residents transition from public housing to market-rate housing. HAWS also acquired two properties in the Plan area and conducted renovations to improve the aesthetics and functionality of the properties – Bethlehem Pointe in 2014 and New Hope Manor in 2017.

The City also assisted with commercial redevelopment in the R/ECAP grouping through its Revitalizing Urban Commercial Areas (RUCA) program. The City provided funding for improvements and renovations on Liberty Street, with the goal of re-energizing the distressed area and attracting new businesses to serve the community.

3. Contributing Factors of R/ECAPs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of R/ECAPs.

Priority Contributing Factors

- Deteriorated and abandoned properties
- Lack of community revitalization strategies
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Location and type of affordable housing

Non-Priority Contributing Factors

• Lending discrimination

iii. Disparities in Access to Opportunity

1. Analysis

Among the many factors that drive housing choice for individuals and families are neighborhood factors such as access to quality school, jobs, and transit. Housing market conditions, local policies and practices, and other factors that lead to disparate levels of access to these and other resources based on protected class have important implications for fair housing.

To measure economic, environmental, and educational conditions at a neighborhood level, HUD developed a methodology that quantifies the degree to which an area provides such opportunities. For each census block group in the U.S., HUD provides a score on several "opportunity dimensions," including school proficiency, poverty, labor market engagement, job proximity, transportation costs and transit trips, and environmental health. For each block group, a value is calculated for each index and results are then standardized on a scale of 0 to 100 based on relative ranking within the metro area. For each opportunity dimension, a higher index score indicates more favorable neighborhood characteristics. Average index values by race, ethnicity, and poverty status for the city of Winston-Salem, Forsyth County, and the Winston-Salem Region are provided in the table that follows. These values can be used to assess whether some population subgroups live, on average, in higher opportunity areas than others.

Table 5. Opportunity Indicators by Race/Ethnicity								
	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index	
City of Winston-Salem: Total Population								
White, Non-Hispanic	53.46	42.21	64.71	42.47	38.88	48.53	42.95	
Black, Non-Hispanic	23.43	18.70	31.92	46.95	44.58	53.79	41.79	
Hispanic	25.37	20.02	37.86	43.76	42.58	54.36	43.20	
Asian or Pacific Islander, Non-Hispanic	49.82	35.50	64.77	44.66	43.53	52.66	42.22	
Native American, Non-Hispanic	34.69	24.74	45.85	44.55	42.31	54.29	42.28	
City of Winston-Salem: Population Below Federal Poverty Line								
White, Non-Hispanic	36.44	26.94	49.73	44.43	43.44	56.15	41.40	
Black, Non-Hispanic	13.76	15.52	23.01	51.16	48.50	56.56	38.73	
Hispanic	16.91	19.91	34.42	46.39	44.41	53.53	43.25	
Asian or Pacific Islander, Non-Hispanic	31.78	24.83	49.21	50.49	50.50	70.76	38.01	
Native American, Non-Hispanic	59.95	28.72	65.51	31.33	26.81	40.90	58.76	
Forsyth County: Total Population								
White, Non-Hispanic	58.23	52.41	64.07	35.81	32.46	46.81	48.29	
Black, Non-Hispanic	27.82	23.95	35.52	44.30	41.82	51.99	43.25	
Hispanic	30.46	27.74	42.04	41.74	39.97	53.72	44.63	
Asian or Pacific Islander, Non-Hispanic	55.02	44.15	66.26	40.94	38.73	51.01	44.82	
Native American, Non-Hispanic	42.51	37.65	49.68	37.59	35.44	50.09	46.74	
Forsyth County: Population Below Federal Poverty Line								
White, Non-Hispanic	43.25	40.67	52.08	37.15	35.75	51.85	46.47	
Black, Non-Hispanic	15.69	17.75	24.83	50.10	47.31	55.76	39.41	
Hispanic	20.10	24.43	37.70	44.68	42.75	53.77	44.40	
Asian or Pacific Islander, Non-Hispanic	33.61	28.79	49.89	47.59	47.74	68.41	40.19	
Native American, Non-Hispanic	51.82	55.82	53.08	25.29	21.35	41.22	58.54	

	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index	
Winston-Salem Region: Total Population								
White, Non-Hispanic	51.10	54.39	50.57	31.14	22.82	46.22	53.83	
Black, Non-Hispanic	28.39	23.61	34.10	43.36	38.18	52.81	42.26	
Hispanic	31.13	30.84	38.70	40.04	33.93	53.59	45.16	
Asian or Pacific Islander, Non-Hispanic	51.22	42.18	57.94	38.64	33.41	51.92	44.41	
Native American, Non-Hispanic	42.05	40.72	42.73	34.83	25.82	49.78	48.05	
Winston-Salem Region: Population Below Federal Poverty Line								
White, Non-Hispanic	40.16	47.89	40.41	32.01	23.39	47.86	52.06	
Black, Non-Hispanic	15.64	22.04	22.60	49.91	42.31	57.08	37.24	
Hispanic	20.92	31.44	33.62	42.77	36.36	54.89	44.83	
Asian or Pacific Islander, Non-Hispanic	33.39	39.90	37.79	42.04	32.16	66.74	36.37	
Native American, Non-Hispanic	36.64	41.98	27.88	29.96	17.06	37.87	56.60	

Sources: Decennial Census; ACS; Great Schools; Common Core Data; SABINS; LAI; LEHD; NATA

a. Educational Opportunities

i. Describe any disparities in access to proficient schools based on race/ethnicity, national origin, and family status.

The maps on the following pages show HUD-provided opportunity scores related to education for Winston-Salem and Forsyth County, along with the demographic indicators of race/ethnicity, national origin, and family status. This school proficiency index is calculated based on performance of 4th grade students on state exams. It relies on attendance zones, if available, and otherwise calculates proficiency based on the performance of elementary schools within 1.5 miles of a block group's residents. In each map, lighter shading indicates areas of lower opportunity and darker shading indicates areas of higher opportunity.

In the city of Winston-Salem, non-Latino white residents have the highest average school proficiency index at 42.2. Index values for African Americans and Latinos are markedly lower at 18.7 and 20.0, respectively.

Countywide, access to proficient schools is improved for all groups. However, significant gaps between white residents and people of color persist. The average white resident in Forsyth County lives in an area with a school proficiency index of 52.4, compared to 24.0 for the average African American resident and 27.7 for Latinos. These gaps (28.5 and 24.7, respectively) are greater than those at the city level (23.5 and 22.2, respectively).

For the Winston-Salem population below the federal poverty line, access to proficiency schools is diminished. In the city, poor white residents live in areas with an average school proficiency index of 26.9, poor African Americans in an area with an average of 15.5, and poor Latinos, 19.9. These values indicate that disparities between racial and ethnic groups exist even for the population in poverty, although the gaps are less pronounced than for the population overall.

In the county, disparities in access to quality schools amongst poor population groups are larger than in the city. There is a 22.9-point gap between index values for poor white and Black residents, and a 16.2-point gap between poor whites and Latinos. Overall, these values indicate that poverty is less likely to impact access to quality schools in the county than in the city.

Proficient school access for foreign-born residents and families with children is discussed in the next question.

ii. Describe the relationship between the residency patterns of racial/ethnic, national origin, and family status groups and their proximity to proficient schools.

The maps that follow show school proficiency scores with race and ethnicity, national origin, and family status. The show that highest proficiency scores are in west Winston-Salem and the western part of Forsyth County. More specifically, the area of Winston-Salem west of N. Stratford Road between the I-40 business route and Reynolda Road, the western edge of the city, and the town of Lewisville have the highest scores. The lowest scoring areas are all in Winston-Salem, including most R/ECAP census tracts, areas along US-52 and University Parkway in the northwest, and areas southeast of the I-40 business interchange.

As the average index values by race and ethnicity indicate, African American and Latino residents are more likely than whites to live in areas with low school proficiency values. Immigrants, particularly Mexican-born residents, also live predominantly in areas with low access to proficient schools.

Quality schools are particularly important for families with children. The map indicates that families with children generally reside throughout the county and city. Families with children make up sizeable shares of households in Lewisville and west Winston-Salem, where quality school access is above average. However, families also make up even larger shares of households in R/ECAP tracts, where proficiency scores are among the lowest in the region.

iii. Describe how school-related policies, such as school enrollment policies, affect a student's ability to attend a proficient school. Which protected class groups are least successful in accessing proficient schools?

Winston-Salem/Forsyth County Schools serves 54,000 students in the city of Winston-Salem and Forsyth County. The district operates 43 elementary school, 14 middle schools, and 15 high school, along with 9 non-traditional schools. These counts include 20 magnet elementary, middle, and high schools offering intensive study in specific areas such as language, culture and global studies; science, technology, engineering, and math (STEM); career preparation; joint college enrollment; visual and performing arts; and hands-on learning.

The school district is divided into attendance zones, with multiple schools within each zone. Each student has the option of attending their residential school (assigned based on address) or another school of their choice located within their attendance zone. Each year, parents can identify up to two or three selections within their zone as the desired school. School assignments are made based on space availability. The district provides transportation to any school within each zone, so students are able to use the school bus even if they do not attend their residential school. Students may also select to attend a school in another zone; however, transfers to other zones are limited by availability and transportation is not provided across zones.

Students are also eligible to apply for up to three magnet schools. Generally, applications are open to any students within the school district, although some program may have specific requirements. The Downtown School, for example, requires that families live or work in downtown Winston-Salem. When more applications are received than magnet seats are available, acceptance is determined using a random lottery. Bus transportation is provided to all magnet schools, regardless of zones, via Magnet Shuttle stops. This service currently provides over 2,000 students with transportation to school.

Of the 20 magnet schools in Forsyth County, 14 are in a low- and moderate-income census tract; of these, three are also within an R/ECAP. Comparing the racial and ethnic composition of each school to that of the census tract where its located shows that 12 of the 20 magnet schools have a student body that is more diverse than the neighborhood as a whole; six of the schools are less diverse, and two have a racial/ethnic composition that roughly matches that of the surrounding neighborhood.

School proficiency indices indicate that African American and Latino students in Winston-Salem and Forsyth County are least successful in accessing proficient schools. HUD's indices assess the proficiency of schools proximate to households/population, but do not reflect that some students may attend other, more proficient schools within their zone, within another zone, or a magnet school. Because many families may prefer to attend their neighborhood school or be unable to secure spots in other schools, school performance at the neighborhood level continues to be a key dimension of fair housing and access to opportunity.

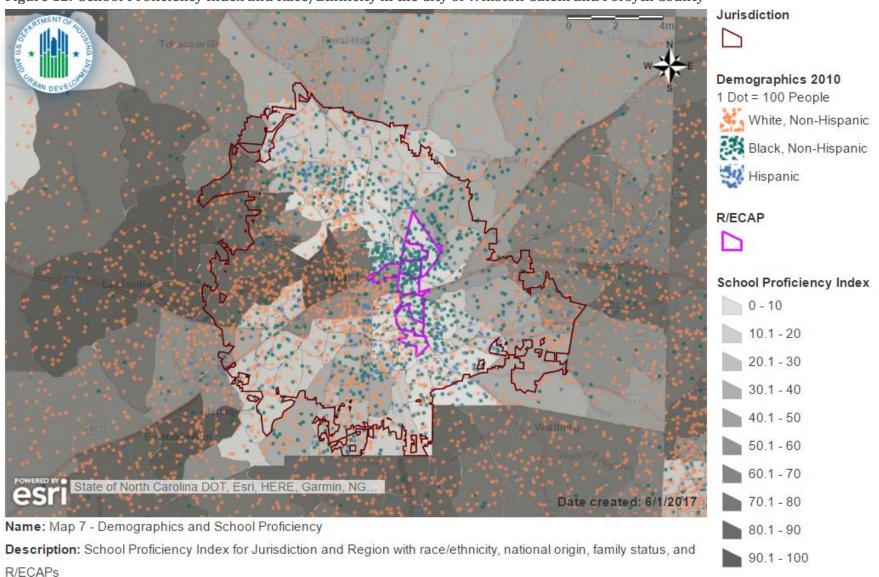


Figure 12. School Proficiency Index and Race/Ethnicity in the City of Winston-Salem and Forsyth County

Jurisdiction: Winston-Salem (CDBG, ESG)

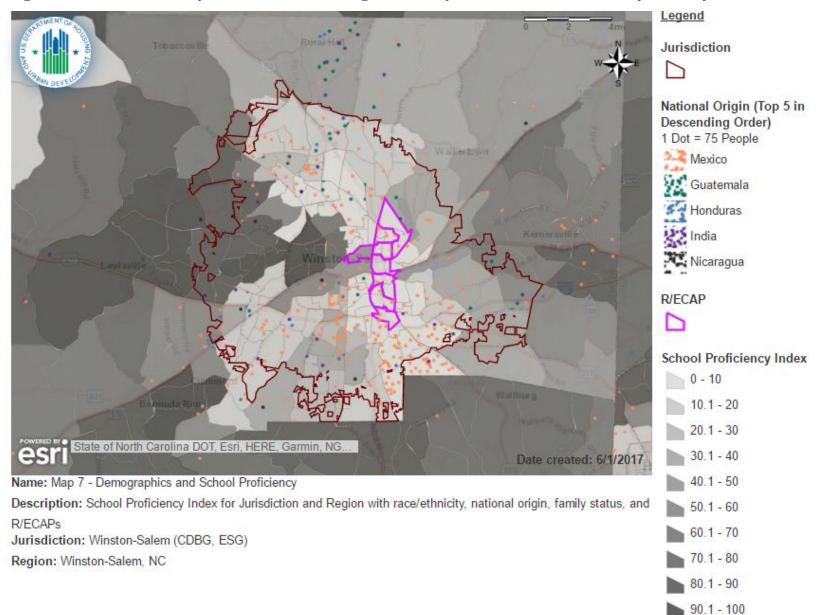


Figure 13. School Proficiency Index and National Origin in the City of Winston-Salem and Forsyth County

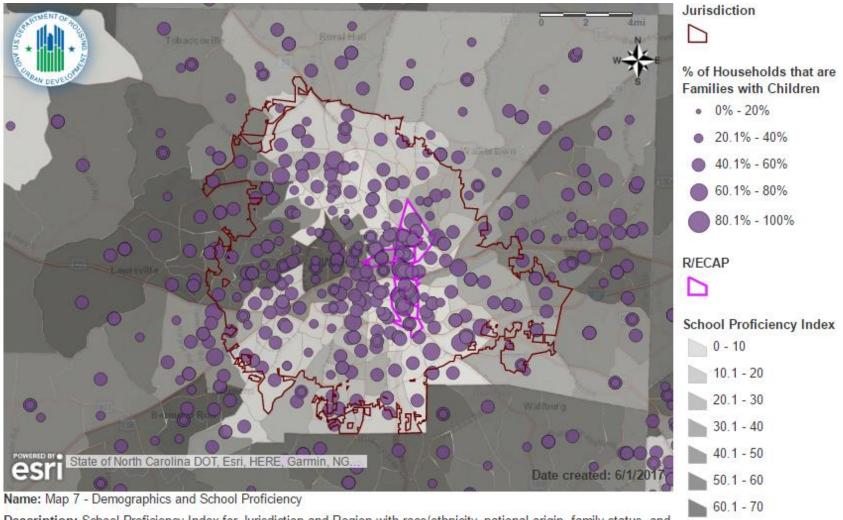


Figure 14. School Proficiency Index and Households with Children in the City of Winston-Salem and Forsyth County

Description: School Proficiency Index for Jurisdiction and Region with race/ethnicity, national origin, family status, and R/ECAPs Jurisdiction: Winston-Salem (CDBG, ESG) Region: Winston-Salem, NC

70.1 - 80

80.1 - 90

90.1 - 100

b. Employment Opportunities

i. Describe any disparities in access to jobs and labor markets by protected class groups.

According to *Legacy 2030*, Winston-Salem and Forsyth County's most recent Comprehensive Plan, employment in Forsyth County is projected to grow from 229,000 jobs in 2010 to 295,000 by 2030. This growth is anticipated to continue the county's transition from a good-producing economy to one that is knowledge- and service-based. Textile, cigarette, and furniture manufacturing jobs that historically provided many of the area's jobs with family-sustaining wages have become obsolete or left the region. From 1990 to 2010, Forsyth County lost 18,903 manufacturing jobs, a trend which continued during the recent depression.

As manufacturing jobs have declined, Winston-Salem and Forsyth County have seen growth in service-oriented employment (such as retail and hospitality) which are often low-wage jobs. Knowledge-based employment, including high-tech medical research companies, has also grown. These jobs often have higher wages, but also require higher education or advanced training.

In terms of economic development, Winston-Salem and Forsyth County's goal is to "attract new businesses and expand existing large and small businesses to provide a broad range of employment opportunities and a high quality of life and prosperity" for residents and employees. Toward this goal, the Wake Forest Innovation Quarter currently offers 1.8 million square feet of office, laboratory, and educational space for research, business, and education in the high-tech, biotechnology, and life science sectors. To assist the local workforce in meeting the needs of new employers, Forsyth Tech has a nationally-recognized biotech training program. To assist with business development in targeted redevelopment areas, the City of Winston-Salem offers business assistance programs, a building rehabilitation program, and its Revitalizing Urban Commercial Areas (RUCA) program. The City also operates a small business center and small business loan program for local entrepreneurs.

Table 5 and the maps that follow provide data regarding access to jobs and labor markets by race and ethnicity, national origin, and familial status. The Jobs Proximity Index measures the physical distance between place of residence and job locations. The Labor Market Engagement Index is based on unemployment rate, labor force participation rate, and the percentage of the population age 25 and over with a bachelor's degree or higher. Again, lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity.

Looking at jobs proximity, scores are roughly equivalent for most racial and ethnic groups in the city of Winston-Salem. They range from averages of 48.5 for whites to 54.4 for Latinos. For poor Winston-Salem residents, scores show little variation for the three largest population segments: 53.5 for poor Latino residents and 56 for poor whites and African Americans. Average scores for poor Asian and Native Americas vary considerably, but their low population shares prevent drawing strong conclusions from these values.

In Forsyth County, proximity to jobs is somewhat lower for each racial and ethnic group, not surprising given that the majority of jobs are within Winston-Salem. Again, there is little variation in average index scores, which range from 46.8 for whites to 53.7 for Latinos. For

people in poverty, average scores for the three largest population segments range from 51.9 for white people to 55.7 for Blacks residents.

Visually, it can be seen that areas with the closest proximity to jobs tends to be along key transportation corridors in the city and county, including US-52, I-40 Business, I-40, and Reidsville Road, which extend from Winston-Salem to parts of Kernersville, Rural Hall, and Clemmons. The Wake Forest University area is also a job center. As the average index scores show, many African Americans and Latinos live in areas with proximity to jobs, particularly along US-52 in Winston-Salem and Rural Hall. The concentration of foreign-born residents living in northwest Winston-Salem are proximate to job locations, while those in the southeast have less access.

While the Jobs Proximity Index does not show disparities by race and ethnicity, Labor Market Index values tell a different story regarding access to jobs, with pronounced gaps between average values for white, Black, and Latino residents. In the city of Winston-Salem, white residents have an average labor market index scores of 64.7, more than 25 points above that of African Americans (31.9) and Latinos (37.9). Controlling for income, gaps persist. Poor whites have an average score of 49.7, compared to 23.0 for African Americans and 34.4 for Latinos.

Labor market index scores at the county level are comparable to those of the city. White residents have an average of 64.1, more than 22 points above the average for Black and Latino residents (35.5 and 42.0, respectively). Again, this difference is not simply economics. Looking at scores for households in poverty, whites live in areas with an average labor market index value of 52.1, nearly 40 points above poor African Americans (24.8) and 26 points above poor Latinos (37.7).

As the maps show, areas with highest labor market index values are on the city's west side, south of Reynolda Road and north of I-40 Business. Parts of Rural Hall and Kernersville also have high labor market scores. In Winston-Salem, areas with the strongest labor markets are predominantly settled by whites; there are few foreign-born residents in these areas. Areas with concentrations of foreign-born residents in the Winston-Salem, particularly immigrants from Mexico, have low labor market index values. In the county, one tract in Rural Hall has strong labor market engagement and is home to many immigrants, including people from India, Guatemala, and Honduras.

Overall, the combination of the Jobs Proximity and Labor Market Indices reveal that proximity to jobs does not equate to access, and that areas with higher employment and labor force participation rates are not necessarily those closest to job centers.

ii. How does a person's place of residence affect their ability to obtain a job?

While neither employment index gauges Winston-Salem and Forsyth County residents' ability to obtain jobs, job proximity is likely to have an impact on employment opportunities, especially for low and moderate wage workers whose ability to afford transportation may be constrained. For those who are transit dependent, living near a bus route which connects easily to job centers with employment opportunities that match their skill set is crucial. For someone living in Winston-Salem, a job in a suburban area would likely not be accessible via public transit, and vice versa. Even within the city, long bus rides and/or multiple transfers

could inhibit accessibility. Reduced routes on weekends or weekday evenings can also affect riders' ability to take weekend or second or third shift jobs. Persons with disabilities may also see their employment opportunities limited by the availability of bus or paratransit service from their place of residence to desired job locations.

For low and moderate wage workers with personal automobiles, transportation costs may also affect job opportunities. Parking, fuel costs, and maintenance costs due to wear and tear on older cars can limit the distance employees are able to commute to work, and thus affect their ability to apply for jobs further from their residence.

iii. Which racial/ethnic, national origin, or family status groups are least successful in accessing employment?

The Labor Market and Jobs Proximity Indices show that in the city of Winston-Salem and in Forsyth County, African Americans are least successful in accessing employment. While they live in areas with comparable or better proximity to jobs than whites, labor market engagement (which is based on unemployment rates, labor force participation rates, and education attainment) is substantially lower. Black Winston-Salem residents live in neighborhoods that have, on average, a 32.8-point gap in labor market engagement scores compared to whites. In Forsyth County, the gap is 28.6 points.

Controlling for income, there is a 27.7-point gap in labor market engagement index values between poor white and poor African American residents in the city, and a 39.2-point gap in Forsyth County.

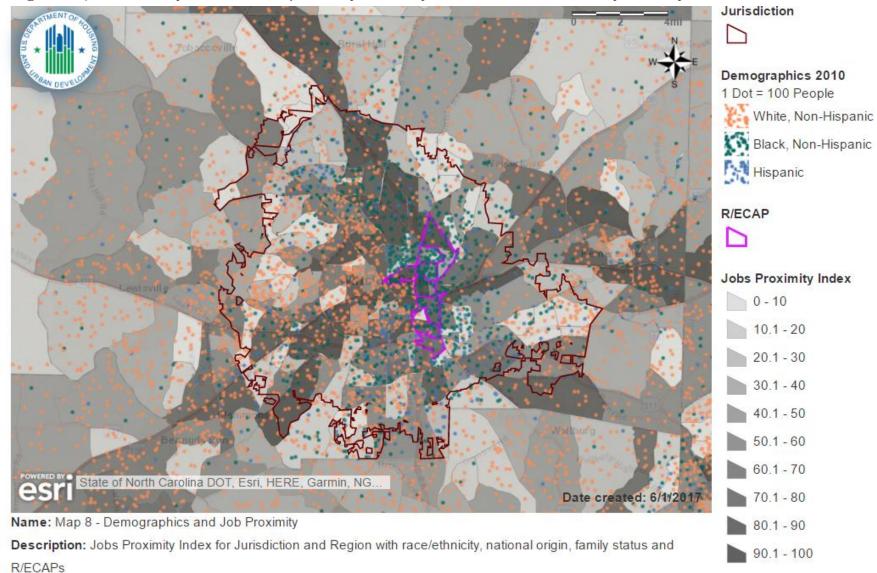


Figure 15. Jobs Proximity Index and Race/Ethnicity in the City of Winston-Salem and Forsyth County

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Jurisdiction: Winston-Salem (CDBG, ESG)

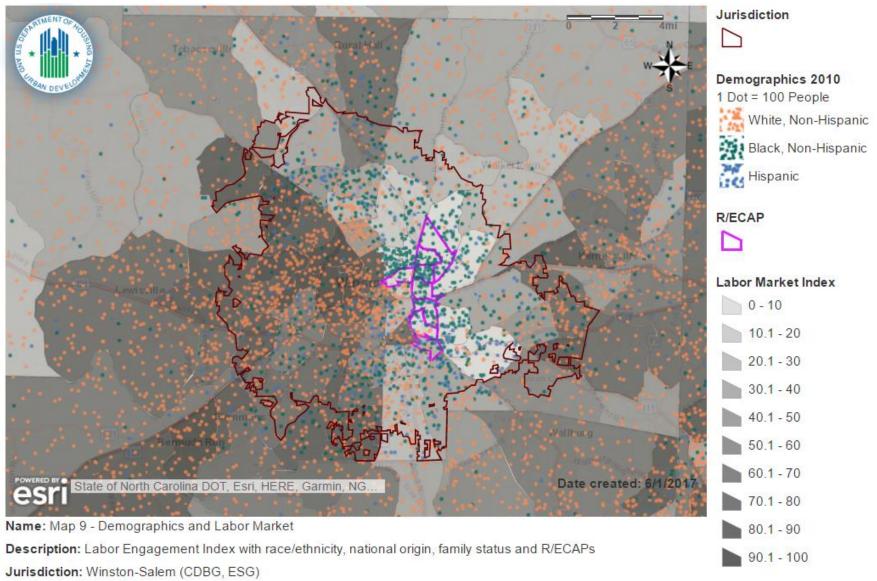


Figure 16. Labor Market Index and Race/Ethnicity in City of Winston-Salem and Forsyth County





90.1 - 100

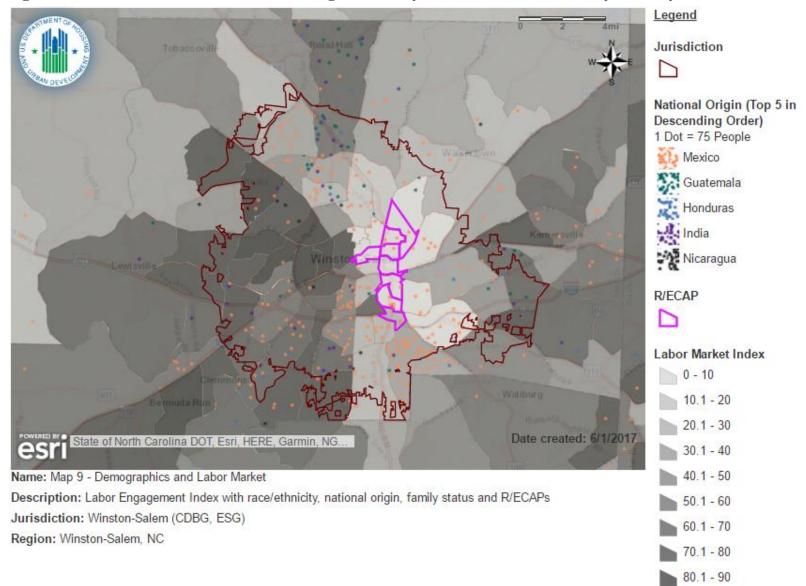


Figure 18. Labor Market Index and National Origin in the City of Winston-Salem and Forsyth County

90.1 - 100



Figure 19. Jobs Proximity Index and Households with Children in the City of Winston-Salem and Forsyth County

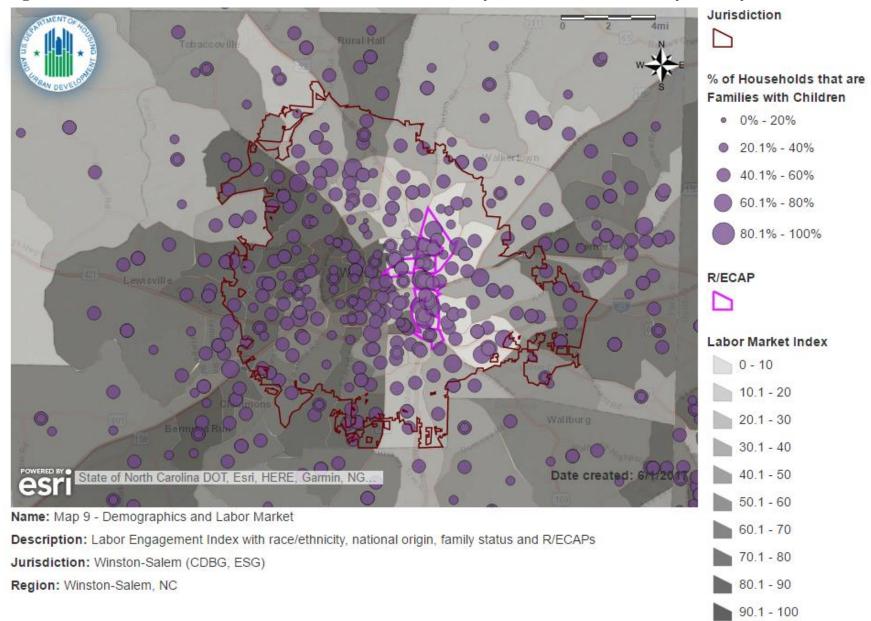


Figure 20. Labor Market Index and Households with Children in the City of Winston-Salem and Forsyth County

c. Transportation Opportunities

i. Describe any disparities in access to transportation based on place of residence, cost, or other transportation related factors.

The maps in this section illustrate data regarding access to transit and transportation costs by race and ethnicity, national origin, and familial status. The Transit Trip index measures how often low-income families in a neighborhood use public transportation, while the Low Transportation Cost Index measures the cost of transport and proximity to public transportation by neighborhood. Again, lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity.

Transit trip index values show that minority population groups in Forsyth County and Winston-Salem live in neighborhoods where residents use transit at similar or higher rates than whites; the same is true for the 5-county region as well. In all three of these geographies, Black residents tended to live in neighborhoods with the most frequent transit use while white residents' neighborhoods used public transportation least frequently. The disparity between Black and white population groups ranged from 12.22 points for the region to 8.49 points in Forsyth County, and 4.28 points in the City of Winston-Salem. Transit usage is therefore more equitable across racial and ethnic groups within Winston-Salem than in the county or the region.

The Low Transportation Cost index produces results similar to those of the Transit Trips index, only with a greater degree of disparity. Whether considering the City of Winston-Salem, Forsyth County, or the region, Black residents were more likely than any other population group to live in neighborhoods with low transportation costs whereas white residents tended to live in areas with the highest transportation costs. In all three geographies, the Black-white disparities were greater than any other pairing and ranged from 5.7 points in the city to 15.36 points in the region.

The Housing Authority recently completed a Choice Neighborhood Planning Grant, which included a community survey. Through its partnership with a community group, the Cleveland Avenue Transformation Team, the Authority achieved a 98% response rate from Cleveland Avenue Homes residents for this survey, completed in February 2015. Nearly half of resident survey respondents (49.6%) indicate that they rely on the bus for their transportation needs; another 31.4% use privately owned cars and 3.8% use Winston Salem's paratransit service Trans-AID. Very few respondents walk for purposes of transportation (5.8%), and none of the survey respondents indicate using a bicycle to get from place to place. The top transportation-related issues identified by survey respondents are pedestrian safety/sidewalk conditions and traffic speeds, both named by 27% of participants. Other issues of concern are the frequency of public transportation (23%), road conditions (21%), and transportation cost (20%). Transportation affordability tends to be an issue of ongoing concern in the neighborhood as well. A majority of neighborhood residents (62.3%) are spending 22-26% of their income on transportation-related costs; another 37.7% spend 18-22%. Although no residents currently report using a bike as their main form of transportation, many expressed a desire for improved biking facilities, including marked bike

lanes on streets (44%), better access to existing trails (32%), and improved connections and interaction with the greater city (30%).

ii. Which racial/ethnic, national origin or family status groups are most affected by the lack of a reliable, affordable transportation connection between their place of residence and opportunities?

Rural areas at the outer edges of Forsyth County that are not served by transit and are also furthest from job centers in Winston-Salem also happen to be primarily inhabited by white residents. At the same time, racial and ethnic minorities as well as foreign-born residents overwhelmingly live inside Winston-Salem's city limits where transit access is better and where the denser physical environment reduces transportation distances and, thus, costs. As a result, white residents are statistically most likely to live in places with low levels of transit use and proximity and the highest transportation costs. Heavy concentrations of families with children are found both in urban areas with good transit access and in rural and suburban areas where transit is less accessible.

iii. Describe how the jurisdiction's and region's policies, such as public transportation routes or transportation systems designed for use personal vehicles, affect the ability of protected class groups to access transportation.

The Winston-Salem Transit Authority (WSTA) serves the public transportation needs of the area's residents. The system operates 30 fixed bus routes as well as a demand-response paratransit service. Weekday bus service runs from 5:30 a.m. to 11:30 p.m. and limited routes are offered on Saturdays and Sundays. According to the National Transit Database, the WSTA provided more than 3.2 million unlinked passenger trips in 2014, with average of 11,480 passenger trips each weekday. The paratransit service provided another 169,000 trips in 2014 with an average of over 600 daily weekday trips. WSTA's fare is \$1, with free transfers between routes. Discounted fares are available for elderly passengers and those with disabilities. All WSTA routes are wheelchair-accessible and all buses are equipped with bike racks.

The WSTA's service area does not extend beyond the Winston-Salem city limits, but Forsyth County is one of 10 adjacent North Carolina counties participating in the Piedmont Authority for Regional Transportation (PART), a network of express bus service and vanpools connecting major cities within the region. The Forsyth County destinations of Clemmons, Kernersville, and King are accessible using the PART system as well as many other cities and communities in the region.

WSTA's affordable fares, daily service, and late-night schedules all work to make public transportation more accessible, particularly to those engaged in service-sector and shift work that requires non-traditional work hours. Those who live in suburban and rural areas typically have greater transportation costs, likely due to the absence of public transit service and the need to rely instead on personal vehicles. The cost to own and maintain a vehicle is prohibitive for many low-income families which can have the effect of limiting their housing choices only to areas with transit access. Some suburban locations are served by PART, which is a positive step toward opening up housing choices in communities outside Winston-Salem,

but PART's \$3 fares and express service model (i.e. limited stops) may make it impractical for some low-income residents.

In areas of denser land uses, walking and biking may be viable means of affordable transportation. The website walkscore.com publishes a point-based score for the walkability of any street address in the United States. The score is determined by the proximity of an address to various neighborhood amenities; the closer the amenities, the higher the Walk Score. Winston-Salem rates as a car-dependent city with an average Walk Score of 22 out of 100 possible points. However, the most walkable Winston-Salem neighborhoods are Downtown and the West End and Reynoldstown historic districts. Downtown and West End are both relatively diverse neighborhoods, while Reynoldstown is predominantly African American. A more walkable Winston-Salem may expand housing choices for low-income residents for whom transportation costs are a barrier, although people of color already appear to have access to housing opportunities in the City's most walkable communities.

Local planning policy and public investments have been supportive of public transit and transit alternatives designed to be more affordable. Progress toward goals in Forsyth County's *Legacy 2030* Comprehensive Plan has included such milestones as completion of a transit study and optimization of WSTA's bus routes for 2017, new parking regulations that require increased commitments to bike and pedestrian facilities in new development, and a greater emphasis on funding for public sidewalk construction.

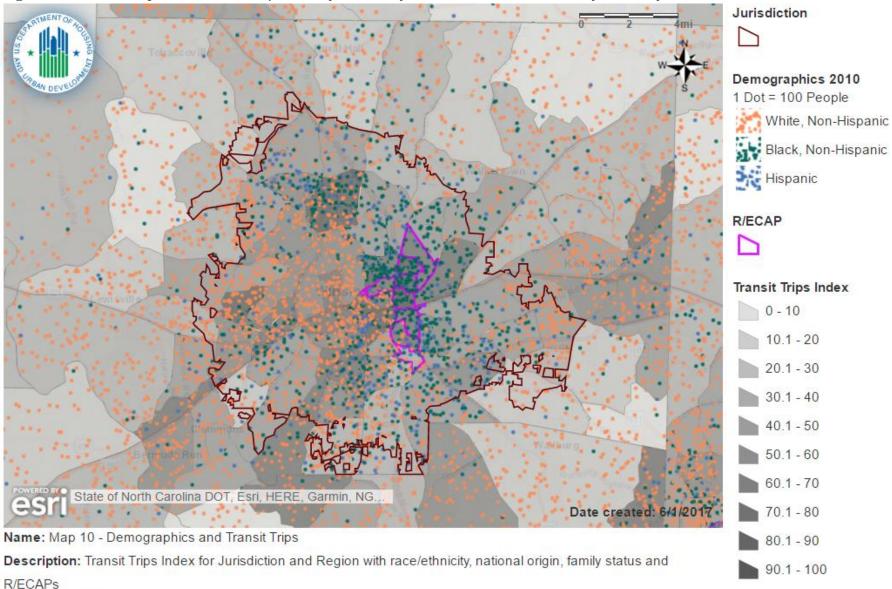


Figure 21. Transit Trips Index and Race/Ethnicity in the City of Winston-Salem and Forsyth County

Jurisdiction: Winston-Salem (CDBG, ESG)

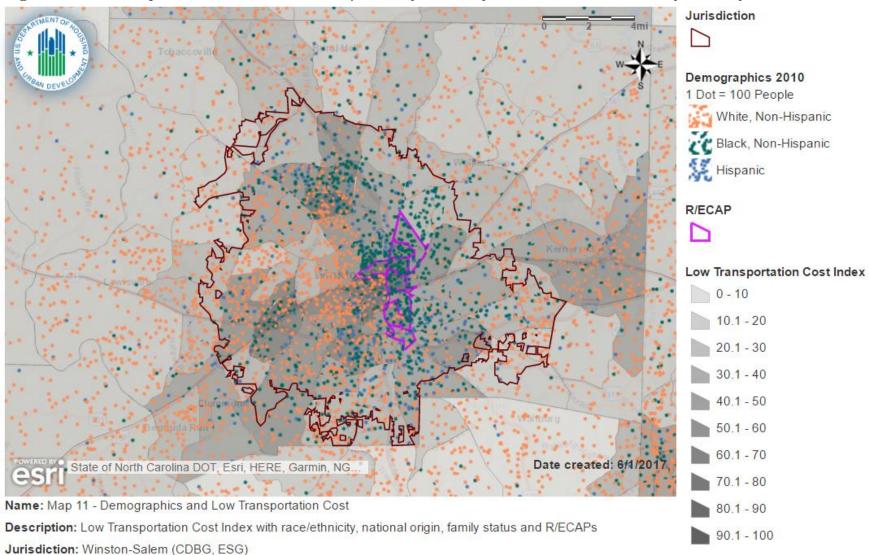


Figure 22. Low Transportation Cost Index and Race/Ethnicity in the City of Winston-Salem and Forsyth County

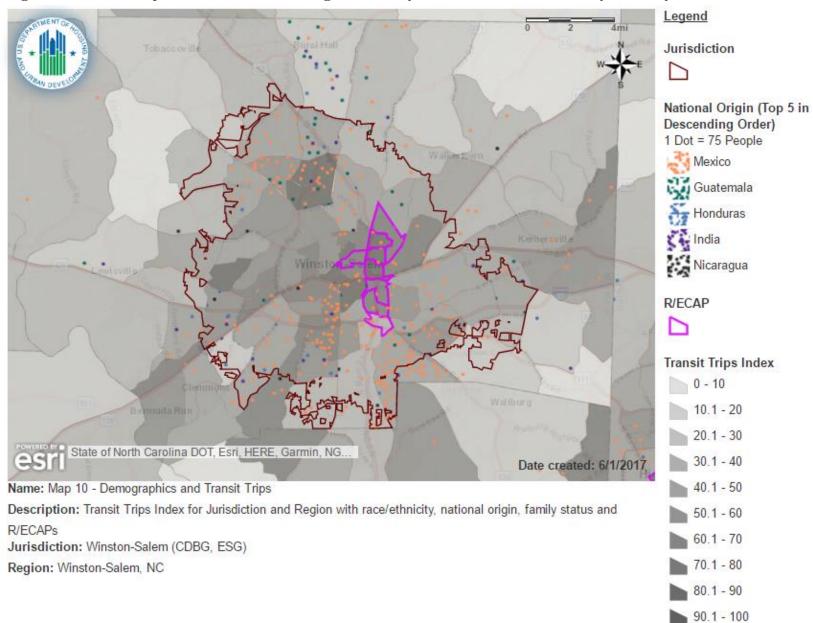


Figure 23. Transit Trips Index and National Origin in the City of Winston-Salem and Forsyth County

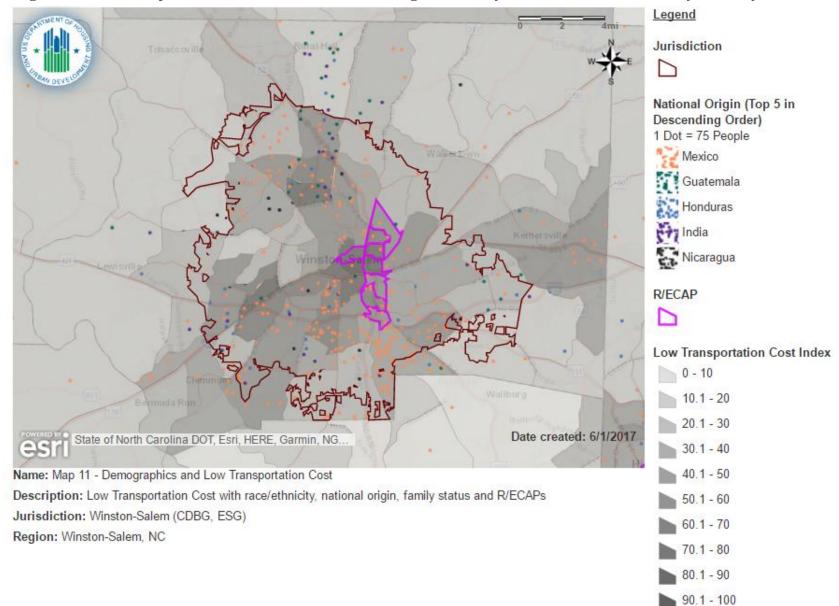


Figure 24. Low Transportation Cost Index and National Origin in the City of Winston-Salem and Forsyth County

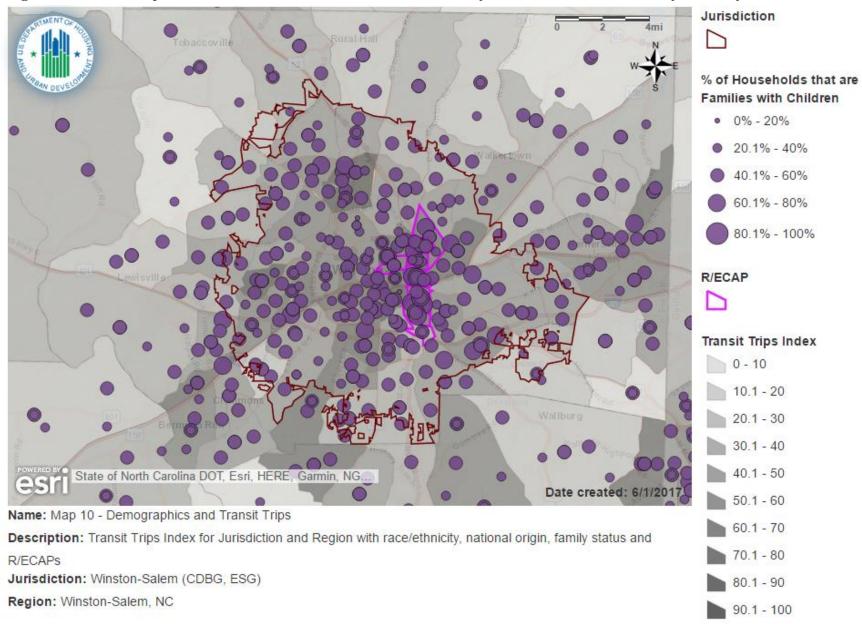


Figure 25. Transit Trips Index and Households with Children in the City of Winston-Salem and Forsyth County



Figure 26. Low Transportation Cost Index and Households with Children in the City of Winston-Salem and Forsyth County

d. Low Poverty Exposure Opportunities

i. Describe any disparities in exposure to poverty by protected class groups.

The maps appearing in this section display data regarding poverty levels in the Winston-Salem region. HUD's Low Poverty Index uses family poverty rates (based on the federal poverty line) to measure exposure to poverty by neighborhood. Lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity.

On average, African Americans and Latinos live in areas with a higher exposure to poverty than do whites and Asians. In Winston-Salem, whites have a poverty index value of 53.46, compared to 23.43 for Blacks, 25.37 for Hispanics, 34.69 for Native Americans, and 49.82 for Asians. The 30-point disparity between Blacks and whites holds true for Forsyth County as well (index values of 52.41 for whites and 23.95 for Blacks), but narrows when considering the wider region. In the region, Asians are least likely to live in impoverished neighborhoods, with an index score (51.22) just above that of whites (51.10) but 22.83 points greater than that of Blacks (28.39).

ii. What role does a person's place of residence play in their exposure to poverty?

The maps that follow indicate that a person's place of residence can have a strong impact on their exposure to poverty. Most of the county's highest-poverty neighborhoods are located in Winston-Salem. These include East Winston, but also other neighborhoods such as the Atwood Road area near the I-40 and US-421 junction, the Washington Park area, and the community surrounding Kimberly Park. While all of the county's highest-poverty neighborhoods are located within the city, Winston-Salem also contains some of the lowest-poverty neighborhoods. Notably, the Buena Vista Road area and the neighborhoods surrounding Forsyth Country Club have Low Poverty Index values of 90 or greater.

iii. Which racial/ethnic, national origin or family status groups are most affected by these poverty indicators?

Poverty exposure index values are lowest (indicating exposure to higher poverty rates) for African American households, followed in most cases by Latinos. With few exceptions, the maps below show that foreign-born residents are primarily clustered in high poverty neighborhoods; many of the county's lowest-poverty tracts contained too few foreign-born residents to register on the maps. Neighborhoods with high percentages of households with children are located in both high and low-poverty areas.

iv. Describe how the jurisdiction's and region's policies affect the ability of protected class groups to access low poverty areas.

The City of Winston-Salem implements programs in two areas designed to improve the access of residents to areas of low poverty. Economic self-sufficiency programs provide case management to people who are homeless, formerly homeless, and those re-entering society from prison to equip them with skills and opportunities to succeed economically. Economic security and independence for these residents will increase the range of housing choices they have available. The second type of anti-poverty program funded by the City involves wealth building through homeownership. Through homeownership counseling, matched savings

accounts (IDAs), and down-payment assistance programs, the City aims to increase access to homeownership in communities of choice.

Countywide policies contained in the *Legacy 2030* Comprehensive Plan focus on increasing indicators of opportunity present in high poverty neighborhoods. For example, the plan correctly notes the lack of healthy food retailing in East Winston and the disproportionate effect this has on people of color and those in poverty. An 11-item action agenda details steps to be taken to overcome this challenge, including assembly of parcels to accommodate a neighborhood-scaled grocery store in neighborhoods lacking healthy food access.

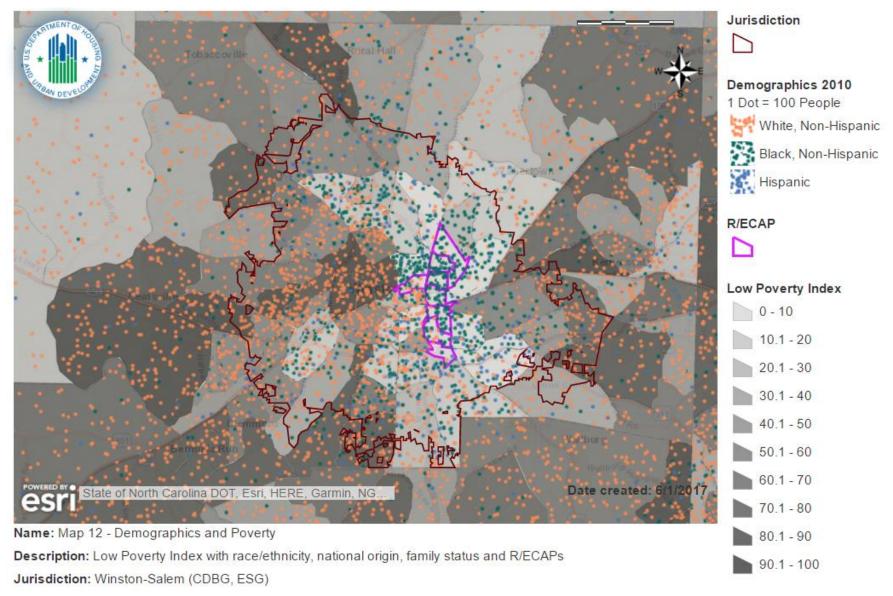


Figure 27. Low Poverty Index and Race/Ethnicity in the City of Winston-Salem and Forsyth County

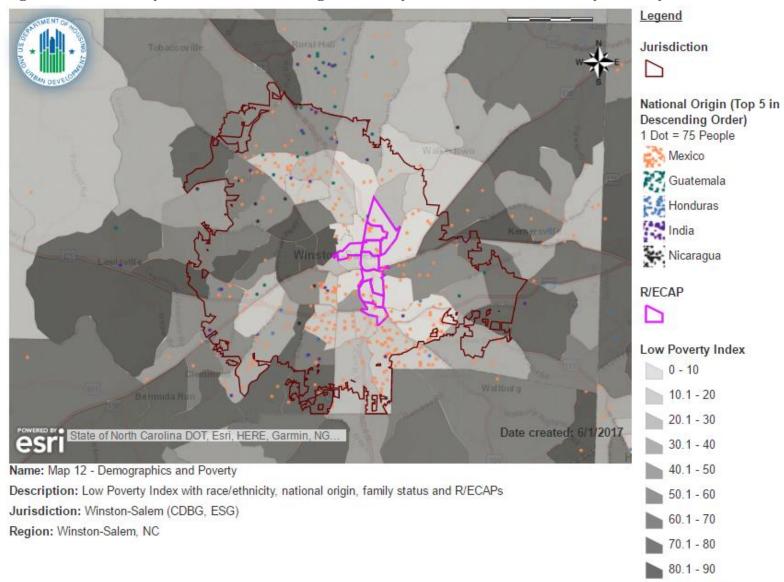


Figure 28. Low Poverty Index and National Origin in the City of Winston-Salem and Forsyth County

90.1 - 100

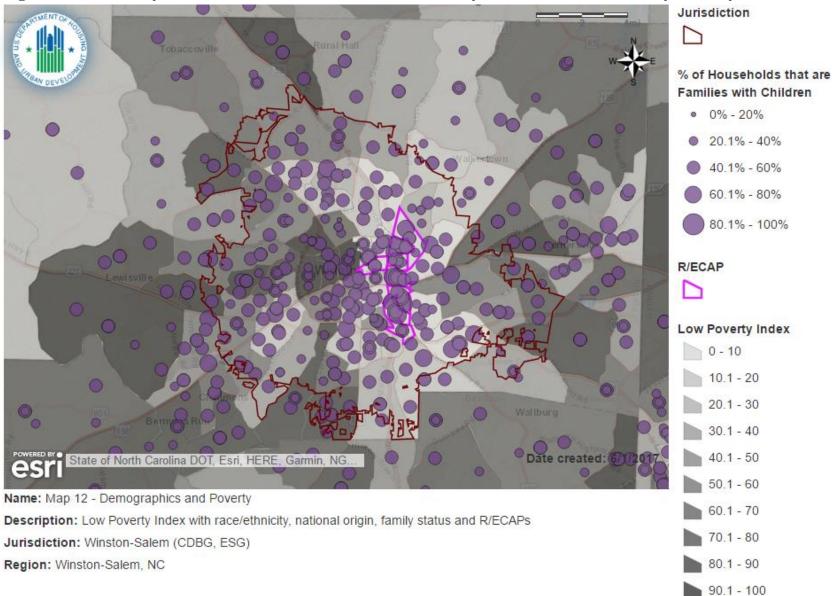


Figure 29. Low Poverty Index and Households with Children in the City of Winston-Salem and Forsyth County

e. Environmentally Healthy Neighborhood Opportunities

i. Describe any disparities in access to environmentally healthy neighborhoods by protected class groups.

The maps in this section illustrate levels of exposure to environmental health hazards. HUD's Environmental Health Index measures exposure based on EPA estimates of air quality (considering carcinogenic, respiratory, and neurological toxins) by neighborhood. The index only measures issues related to air quality and not other factors impacting environmental health. Lighter shading indicates areas of lower opportunity and darker shading indicates higher opportunity.

For both the City of Winston-Salem and Forsyth County, the environmental health index scores show relatively little variation, with just a 1.41-point disparity between the highest and lowest values in the city and a 5.04-point gap in the county. Index values for all racial and ethnic groups were lowest within the city, as compared with values for the same groups in the county or within the larger five-county region. However, it is noteworthy that, while index values are greatest when evaluating the region as a whole, disparities are also greater. Within the region, Black residents lived in neighborhoods with an average score of 42.26 whereas the average score for whites was 53.83, a gap of over 11 points. While the disparity is considerably narrower, Black residents of Winston-Salem and Forsyth County similarly lived in neighborhoods with lower air quality than any other racial or ethnic group.

ii. Which racial/ethnic, national origin or family status groups have the least access to environmentally healthy neighborhoods?

As the maps below show, environmental health hazards are highest in neighborhoods at the outer periphery of Winston-Salem. Within the city limits, most areas score between 20 and 60 on the Environmental Health Index. Highest index scores appear in communities at the outer edges of Forsyth County, particularly along the county's western border, in a section to the north along Stanleyville Road, and an area along Belews Creek in northeast Forsyth County.

Communities of color, particularly Asian, Black, and Hispanic groups, were least likely to live in areas of high environmental quality. On the other hand, the below map suggests that foreign-born residents were generally more likely to reside in areas of high environmental quality, especially in the northern part of Forsyth County. Several clusters of Mexican immigrants are shown south of I-40, an area with some low-scoring neighborhoods, however, Mexican immigrants appear able to access neighborhoods that ranked higher for environmental quality, as clusters also appear in areas with scores in the 40s and 50s. Families with children are dispersed in communities of both relatively high and low environmental quality, indicating that familial status is likely not a primary determinant of a household's ability to access environmentally healthy neighborhoods.

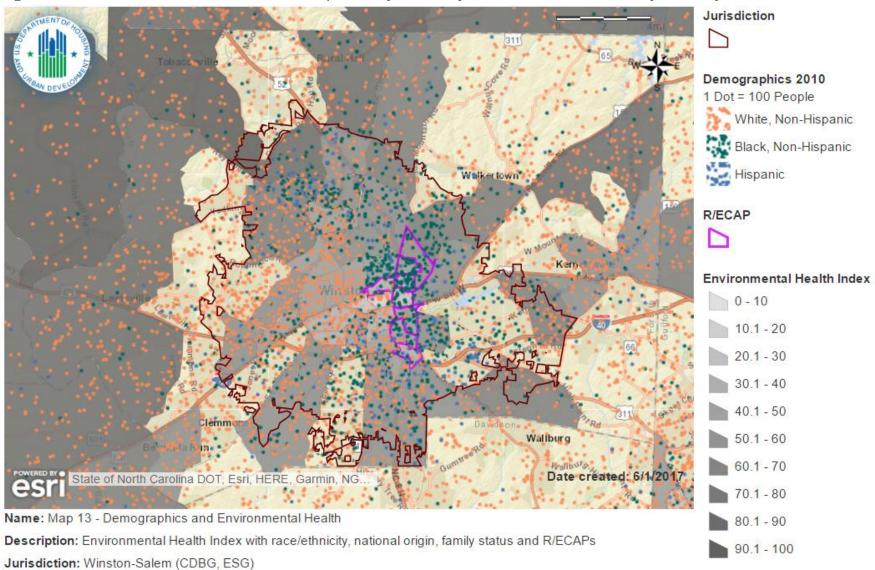


Figure 30. Environmental Health Index and Race/Ethnicity in the City of Winston-Salem and Forsyth County

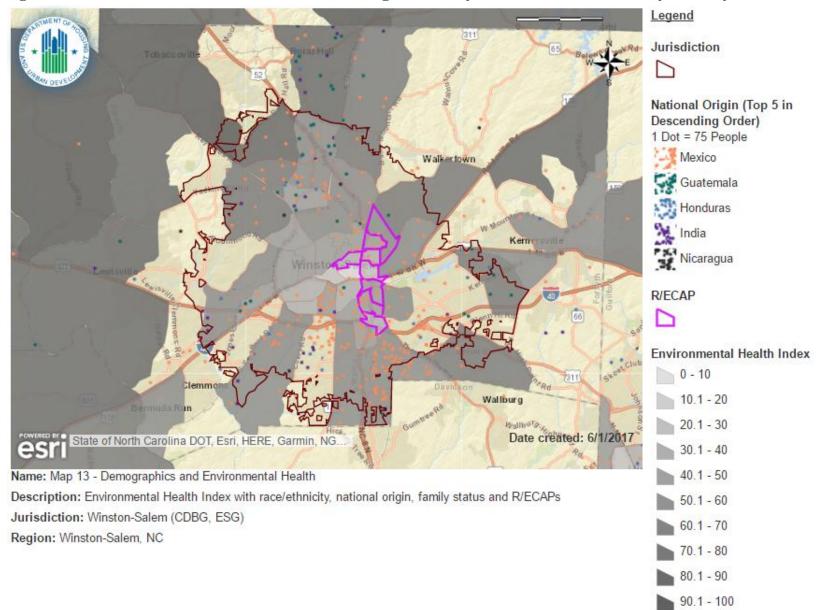


Figure 31. Environmental Health Index and National Origin in the City of Winston-Salem and Forsyth County

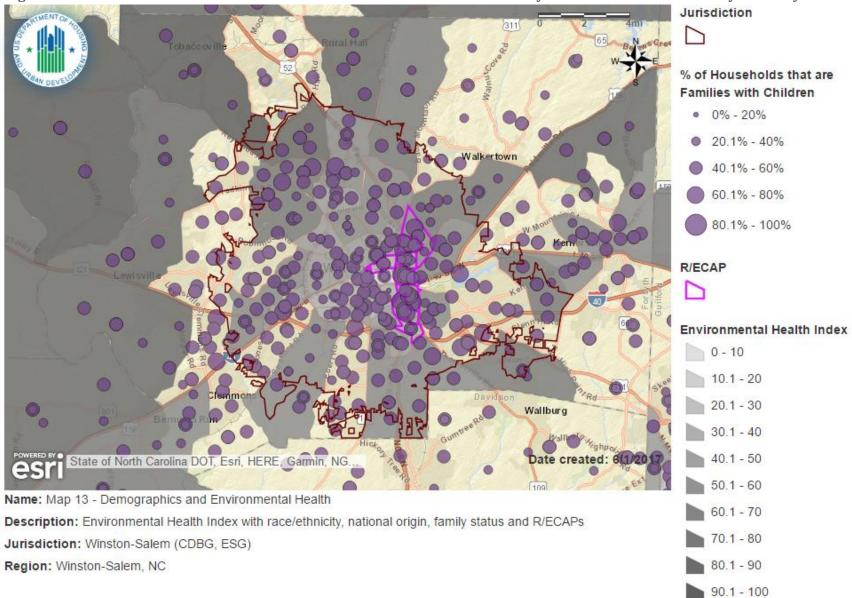


Figure 32. Environmental Health Index and Households with Children in the City of Winston-Salem and Forsyth County

- f. Patterns in Disparities in Access to Opportunity
 - i. Identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors based on race/ethnicity, national origin or familial status. Identify areas that experience an aggregate of poor access to opportunity and high exposure to adverse factors. Include how these patterns compare to patterns of segregation and R/ECAPs.

Overall, non-Latino whites tend to live in neighborhoods with lower poverty and higher school proficiency and labor market index values than African Americas and Latinos, both in the city of Winston-Salem and in Forsyth County. R/ECAP census tracts generally had low scores in each of these dimensions. Opportunity factors related to environmental health and access to transit and job centers showed less disparity, and in many cases, whites lived in areas with lower scores and thus less access than other groups. The R/ECAP tracts had higher scores on these dimensions.

2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about disparities in access to opportunity in the jurisdiction and region affecting groups with other protected characteristics.

In addition to the opportunity indices identified by HUD, community members and local stakeholders identified access to grocery stores and other shopping areas as a crucial resource that is currently lacking in many Winston-Salem neighborhoods, particularly in East Winston. According to the Forsyth Community Food Consortium, the Food Access Research Atlas identified 21 census tracts that qualify as food deserts in and around Winston-Salem. These are areas where a significant share of the population lives more than one mile from a supermarket.

Community members also noted that financial services are unequally provided within the city, with some neighborhoods having little to no access to traditional banks, with check cashing businesses as the only financial services available.

b. The program participant may also describe other information relevant to its assessment of disparities in access to opportunity, including any activities aimed at improving access to opportunities for areas that may lack such access, or in promoting access to opportunity (e.g., proficient schools, employment opportunities, and transportation).

The City of Winston-Salem, Forsyth County, HAWS, and their partners undertake many activities designed to improve access to opportunity, including:

- Winston-Salem/Forsyth County Schools' enrollment policies allow families to choose a school other than their residential school. WSFCS provides transportation to all schools within each attendance zone and to all magnet schools, regardless of attendance zone;
- Winston-Salem Transit Authority offers affordable fares, daily service, and late-night schedules make public transportation more accessible, particularly for people employed in service-sector or shift work positions that have non-traditional work hours;

- City of Winston-Salem provides federal and local funds to non-profit agencies for case management services to homeless and formerly homeless individuals to help them achieve self-sufficiency;
- Efforts are underway communitywide to address the needs of individuals re-entering society from prison;
- HAWS' PATH program focusing on education and employment as a means to help residents move from public to market-rate housing; and
- Mayor Allen Joines spearheaded a Poverty Thought Force using extensive community conversations, exchanges with local and national anti-poverty advocates and experts, impact/feasibility rankings, and review of the analysis by Forsyth Futures to develop recommendations to reduce the number of residents living in poverty (http://www.povertythoughtforce.com).

Additionally, the Winston-Salem/Forsyth County Planning Department outlined several goals for improving equity and opportunity in the city and county in *Legacy 2030*. Specific objectives related to HUD's opportunity indices and opportunity factors identified by the community include:

- Promoting and protecting health and equity by establishing guidelines, standards, and mechanisms that ensure land use planning and design positively affect community health and well-being;
- Designing for active and healthy living through compact, mixed-use neighborhoods with opportunities for transit, walking, biking, recreation, and access to healthy food;
- Providing opportunities for the improved health and welfare of residents of varying incomes, ethnic groups, races, and abilities;
- Providing safe, convenient opportunities for access to health, affordable food for all residents;
- Providing parks and recreational facilities that meet the needs of residents at accessible locations throughout the county;
- Creating a network of greenways that provide recreation, open space, and alternative transportation links to shopping, employment, neighborhoods, and community facilities; and
- Locating and designing education facilities that provide high quality learning opportunities for all and are assets to the neighborhoods where they are located.

3. Contributing Factors of Disparities in Access to Opportunity

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity.

Priority Contributing Factors

- Location of proficient schools and school assignment policies
- Access to jobs educational attainment, job training, job search assistance, hiring practices
- Location and type of affordable housing

Non-Priority Contributing Factors

- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities

iv. Disproportionate Housing Needs

1. Analysis

a. Which groups (by race/ethnicity and family status) experience higher rates of housing cost burden, overcrowding, or substandard housing when compared to other groups? Which groups also experience higher rates of severe housing burdens when compared to other groups?

To assess affordability and other types of housing needs, HUD identifies four housing problems:

- 1. A household is *cost burdened* if monthly housing costs (including mortgage payments, property taxes, insurance, and utilities for owners and rent and utilities for renters) exceed 30% of monthly household income.
- 2. A household is *overcrowded* if there is more than 1.0 persons per room, not including kitchens or bathrooms.
- 3. A housing unit *lacks complete kitchen facilities* if it lacks one or more of the following: cooking facilities, a refrigerator, or a sink with piped water.
- 4. A housing unit *lacks complete plumbing facilities* if it lacks one or more of the following: hot and cold piped water, a flush toilet, and a bathtub or shower.

HUD also defines four severe housing problems, including a severe cost burden (more than 50% of monthly household income is spent on housing costs), severe overcrowding (more than 1.5 persons per room, not including kitchens or bathrooms), lack of complete kitchen facilities (as described above) and lack of complete plumbing facilities (also as described above).

To assess housing need, HUD receives a special tabulation of data from the U.S. Census Bureau's American Community Survey that is largely not available through standard Census products. This data, knows as Comprehensive Housing Affordability Strategy (CHAS) data, counts the number of households that fit certain combinations of HUD-specified criteria, such as housing needs by race and ethnicity.

CHAS data for the city of Winston-Salem, Forsyth County, and the Winston-Salem region is provided in the tables below. As shown, there are an estimated 34,220 households in the city of Winston-Salem with one or more housing problems and 18,645 households with one or more severe housing problems. More than one-third of households citywide have a housing need (37.2%) and one-fifth have a severe need (20.3%). Rates of need are lower in Forsyth County: there 32.8% of households have one or more housing problems and 17.1% have a severe housing problem. Regionally, the incidence of housing needs is even lower.

Looking at need by householder race and ethnicity in Winston-Salem shows that non-Latino Whites have the lowest rates of both housing and severe housing problems (27.7% and 13.2%, respectively). HUD defines a group as having a disproportionate need if its members face housing needs at a rate that is ten percentage points or more above that of whites. Using this definition, there are three groups in the city with disproportionate needs:

- African Americans 46.9% of households have a need and 26.2% have a severe need;
- Latinos 57.0% of households have a need and 40.7% have a severe need; and

• Other non-Latino households – 51.2% of households have a need and 28.4% have a severe need.

In Forsyth County, one-quarter of white households have one or more housing needs (25.0%) and one-eight have a severe housing need (11.6%). Four group have disproportionate rates of housing need and severe housing need relative to white households. They include:

- African Americans 46.0% of households have a need and 25.2% have a severe need;
- Latinos 54.3% of households have a need and 37.6% have a severe need;
- Native Americans 48.4% of households have a need and 25.4% have a severe need; and
- Other non-Latino households 46.6% of households have a need and 25.9% have a severe need.

Table 6 also compares housing need rates for households by size and familial status. Small family households (under 5 people) have the lowest rate of needs (30.6% in the city and 25.7% in the county). Large families (5 or more people) are most likely to experience a housing need, with a little over one-half in the city (51.5%) and 45.0% in the county having one or more housing problems.

Table 7 examines only one dimension of housing need – severe cost burdens. Overall, 15,405 households in Winston-Salem and 20,077 households in Forsyth County spend more than 50% of their income on housing (16.8% and 14.3% of total households, respectively). In Winston-Salem, Black, Latino, and other non-Latino households are all disproportionately affected by severe cost burdens in comparison to white households. In Forsyth County, Black and other non-Latino households are disproportionately likely to have severe cost burdens.

In both geographies, non-family households have the highest rates of severe cost burdens (21.6% in the city and 20.8% in the county).

Overall, African American, Latino, and other non-Latino households typically experience housing problems, severe housing problems, and severe cost burdens at rates that are disproportionately higher than White households. In almost all instances, city of Winston-Salem households have higher rates of need, severe need, and severe cost burdens, than their counterparts in the county and region.

Table 6. Demographics of Households with Disproportionate Housing Needs											
Disproportionate Housing Needs	City	of Winston-S	Salem	Fo	Forsyth County			Winston-Salem Region			
Households Experiencing any of the Four Housing Problems	# with problems	# of households	% with problems	# with problems	# of households	% with problems	# with problems	# of households	% with problems		
Race/Ethnicity											
White, Non-Hispanic	13,645	49,340	27.66%	22,593	90,363	25.00%	48,573	191,683	25.34%		
Black, Non-Hispanic	14,825	31,580	46.94%	16,485	35,874	45.95%	20,319	43,877	46.31%		
Hispanic	4,680	8,215	56.97%	5,491	10,107	54.33%	7,550	14,193	53.20%		
Asian or Pacific Islander, Non-Hispanic	470	1,649	28.50%	672	2,260	29.73%	929	2,817	32.98%		
Native American, Non-Hispanic	40	113	35.40%	124	256	48.44%	314	771	40.73%		
Other, Non-Hispanic	558	1,091	51.15%	681	1,462	46.58%	828	1,838	45.05%		
Total	34,220	91,975	37.21%	46,007	140,299	32.79%	78,510	255,140	30.77%		
Household Type and Size											
Family households, <5 People	14,375	46,965	30.61%	20,001	77,804	25.71%	35,765	149,923	23.86%		
Family households, 5+ People	3,955	7,680	51.50%	5,064	11,253	45.00%	8,970	19,985	44.88%		
Non-family households	15,895	37,335	42.57%	20,948	51,285	40.85%	33,770	85,235	39.62%		
Households Experiencing any of the Four Severe Housing Problems	# with problems	# of households	% with problems	# with problems	# of households	% with problems	# with problems	# of households	% with problems		
Race/Ethnicity											
White, Non-Hispanic	6,500	49,340	13.17%	10,475	90,363	11.59%	23,059	191,683	12.03%		
Black, Non-Hispanic	8,285	31,580	26.23%	9,025	35,874	25.16%	11,101	43,877	25.30%		
Hispanic	3,340	8,215	40.66%	3,803	10,107	37.63%	4,998	14,193	35.21%		
Asian or Pacific Islander, Non-Hispanic	203	1,649	12.31%	307	2,260	13.58%	458	2,817	16.26%		
Native American, Non-Hispanic	15	113	13.27%	65	256	25.39%	225	771	29.18%		
Other, Non-Hispanic	310	1,091	28.41%	379	1,462	25.92%	474	1,838	25.79%		
Total	18,645	91,975	20.27%	24,042	140,299	17.14%	40,295	255,140	15.79%		

Note: All % represent a share of the total population, except household type and size, which is out of total households.

Source: CHAS

Table 7. Demographics of Households with Severe Housing Cost Burden												
	City	of Winston-Sa	alem	Fo	orsyth Count	y	Winston-Salem Region					
Households with Severe Housing Cost Burden	# with severe cost burden	# of households	% with severe cost burden	# with severe cost burden	# of households	% with severe cost burden	# with severe cost burden	# of households	% with severe cost burden			
Race/Ethnicity												
White, Non-Hispanic	0	49,340	11.95%	9,461	90,363	10.47%	20,110	191,683	10.49%			
Black, Non-Hispanic	7,415	31,580	23.48%	8,077	35,874	22.51%	9,900	43,877	22.56%			
Hispanic	1,650	8,215	20.09%	1,914	10,107	18.94%	2,560	14,193	18.04%			
Asian or Pacific Islander, Non-Hispanic	130	1,649	7.88%	220	2,260	9.73%	305	2,817	10.83%			
Native American, Non-Hispanic	15	113	13.27%	40	256	15.63%	200	771	25.94%			
Other, Non-Hispanic	300	1,091	27.50%	365	1,462	24.97%	460	1,838	25.03%			
Total	15,405	91,975	16.75%	20,077	140,299	14.31%	33,535	255,140	13.14%			
Household Type and Size												
Family households, <5 People	6,319	46,965	13.45%	8,112	77,804	10.43%	14,335	149,923	9.56%			
Family households, 5+ People	999	7,680	13.01%	1,294	11,253	11.50%	2,197	19,985	10.99%			
Non-family households	8,074	37,335	21.63%	10,645	51,285	20.76%	16,970	85,235	19.91%			

Note: All % represent a share of the total population within the jurisdiction or region, except household type and size, which is out of total households. The # households is the denominator for the % with problems, and may differ from the # households for the table on severe housing problems. Source: CHAS

b. Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?

The maps that follow show households experiencing housing problems as a share of total households by census tract for the city of Winston-Salem and Forsyth County. As shown, housing needs are most common in Winston-Salem. There are several areas where more than half of households have one or more housing needs. They include four R/ECAP tracts east of downtown across US-52, one tract immediately to the east of the R/ECAP cluster and just north of I-40 Business, and two tracts north of Wake Forest University between US-52 and University Parkway.

The R/ECAPs and the tract to its east with high rates of housing need are segregated; African American and Latino residents make up the majority of the population there. The tracts around Wake Forest University are more integrated, and may include some student households with cost burdens. These tracts also include higher shares of foreign-born populations, including immigrants from Mexico, Guatemala, Honduras, and India.

West Winston-Salem near the city limits, Lewisville, Tobaccoville, and Rural Hall have the lowest rates of housing need.

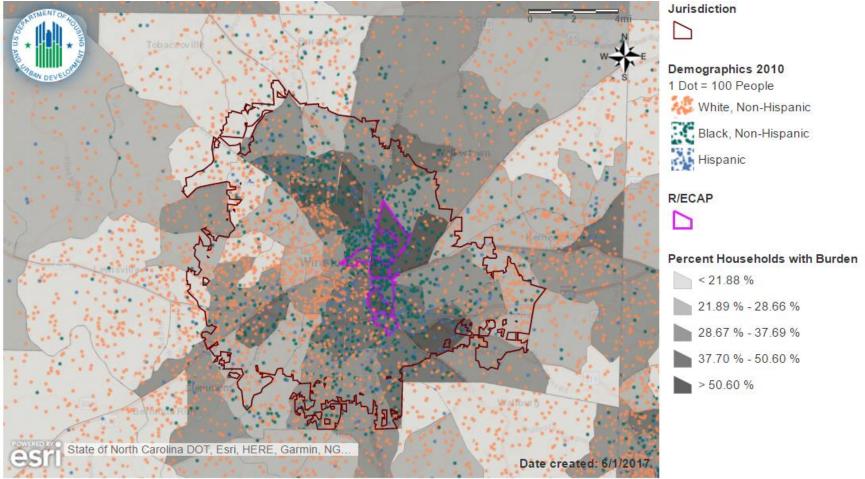


Figure 33. Housing Burden and Race/Ethnicity in the City of Winston-Salem and Forsyth County

Description: Households experiencing one or more housing burdens in Jurisdiction and Region with R/ECAPs and

race/ethnicity dot density Jurisdiction: Winston-Salem (CDBG, ESG)

Name: Map 6 - Housing Problems

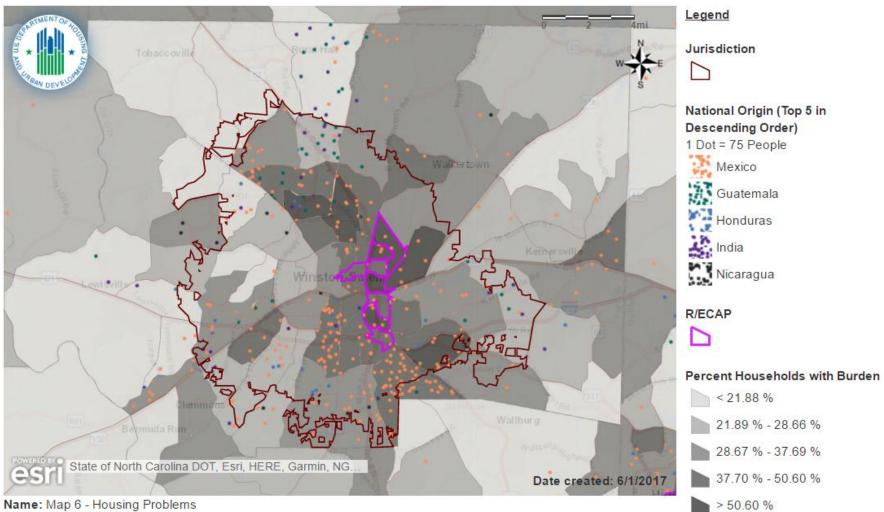


Figure 34. Housing Burden and National Origin in the City of Winston-Salem and Forsyth County

nume: map of floading floblems

Description: Households experiencing one or more housing burdens in Jurisdiction and Region with R/ECAPs and

national origin dot density Jurisdiction: Winston-Salem (CDBG, ESG) c. Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing.

Table 6 shows that there are 3,955 large family households (5 or more people) with a housing problem in the city of Winston-Salem and an additional 1,109 in Forsyth County. While we assume that families with five or more people include at least one child, smaller family households (up to four people) may also include children. Table 8 indicates that up to 3,202 households with children reside in publicly subsidized housing in Forsyth County (the vast majority of which are within Winston-Salem). This total may include family households with a subsidy who still spend over 30% of their income on housing or have another housing need (such as overcrowding), along with households who do not have a housing problem but would otherwise face a cost burden.

Looking at publicly supported housing by number of bedrooms, and assuming that large families would need at least a three-bedroom unit, there is currently an insufficient number of subsidized large units to house the city's large families who have a housing problem (3,955 households versus 2,233 units). Considering that 3+ bedroom units may also be occupied by large families without a housing problem and that there are an additional 1,109 households in Forsyth County outside of Winston-Salem who have a housing need, the imbalance is likely even higher.

Table 8. Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children												
		Forsyth County										
	Households in 0-1 Bedroom Units		Households in 2 Bedroom Units		3+	10lds in Unit ooms	Households with Children					
Housing Type	#	# %		%	#	%	#	%				
Public Housing	705	51.12%	424	30.75%	241	17.48%	501	36.33%				
Project-Based Section 8	898	72.77%	189	15.32%	113	9.16%	274	22.20%				
Other Family	257	87.12%	0	0.00%	0	0.00%	0	0.00%				
HCV Program	519	13.25%	1,443	36.84%	1,879	47.97%	2,427	61.96%				

Source: APSH

d. Describe the differences in rates of renter and owner occupied housing by race/ethnicity in the jurisdiction and region.

The table below provides the racial and ethnic composition of homeowners and renters in Winston-Salem, Forsyth County, and the Winston-Salem region. In the city, about two-thirds of owner households are white, one-quarter are African American, and 5.3% are Latino. Renters are more likely to be households of color, with African Americans making up 46.3% of renters and Latinos constituting 13.7%.

In Forsyth County, three-quarters of owner households are white, 17.8% are Black, and 4.4% are Latino. In contrast, African American households make up one-third of renters and Latinos make up 12.2%.

The data in Table 9 can be used to calculate homeownership rates by race and ethnicity, which shows that households of color are significantly less likely to be homeowners than whites. In Winston-Salem, 71.2% of white households own their homes, compared to 41.7% of African American households and 33.8% of Latinos. These disparities are almost identical at the county and regional levels.

Table 9. Homeownership and Rental Rates by Race/Ethnicity												
City of Winston-Salem				Forsyth	County		Winston-Salem Region					
Race/Ethnicity	Ow	Owners Renters		Ow	Owners Re		ters	Owners		Renters		
	#	%	#	%	#	%	#	%	#	%	#	%
Non-Hispanic												
White	35,110	67.28%	14,225	35.75%	67,740	75.54%	22,624	44.69%	147,885	83.61%	43,780	55.94%
Black	13,155	25.21%	18,405	46.26%	15,959	17.80%	19,887	39.29%	19,885	11.24%	23,980	30.64%
Asian	600	1.15%	1,055	2.65%	1,140	1.27%	1,129	2.23%	1,560	0.88%	1,264	1.62%
Native American	65	0.12%	50	0.13%	210	0.23%	54	0.11%	504	0.28%	265	0.34%
Other	480	0.92%	610	1.53%	714	0.80%	749	1.48%	975	0.55%	865	1.11%
Hispanic	2,775	5.32%	5,445	13.68%	3,947	4.40%	6,165	12.18%	6,085	3.44%	8,105	10.36%
Total	52,185	100%	39,790	100%	89,680	100%	50,619	100%	176,880	100%	78,260	100%

Source: APSH

2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the jurisdiction and region affecting groups with other protected characteristics.

Housing needs for persons with disabilities will be discussed in the Disability and Access Analysis.

b. The program participant may also describe other information relevant to its assessment of disproportionate housing needs. For PHAs, such information may include a PHA's overriding housing needs analysis.

In addition to the housing needs of people who are currently housed, the City of Winston-Salem, Forsyth County, and HAWS recognize that importance of addressing the needs of the homeless. Each year in January, the Winston-Salem/Forsyth County Continuum of Care (CoC) participates in a point-in-time count of homeless people in the county. As of the 2016 PIT count, there were 544 homeless people in Forsyth County: 413 in emergency and seasonal housing, 93 in transitional housing, and 38 unsheltered. The count indicated that African American residents were affected by homelessness at a significantly higher rate than white residents. Nearly two-thirds of those counted were Black (64.0%), compared to one-third of the city population (32.3%) and one-quarter of the county (25.5%). This disproportionate need was particularly acute for homeless families, of whom 75.7% were African American.

In its *Ten-Year Plan to End Chronic Homelessness*, the Continuum of Care identified several goals for providing housing and services for the homeless population, including:

- Creation of 600 new units of permanent, service-enriched housing for individuals and families who are homeless;
- Development of employment services to assist homeless people in finding work;
- Identifying ways to improve collaboration among service providers;
- Adoption of a "Housing First" approach that prioritizes permanent housing for homeless individuals and families and then provides supportive services; and
- System enhancements to ensure mainstream and homeless-specific services are more effective.

The CoC has worked with a variety of community partners, including HAWS, United Way of Forsyth County, Experiment in Self-Reliance, Salvation Army, Samaritan Ministries, Bethesda Center, AIDS Care Service, Next Step Ministries and others to provide housing, services, homeliness prevention, and outreach to homeless in the city and county. Activities included rapid rehousing and rental assistance for homelessness prevention; funding to serve residents of permanent supportive housing; funding for transitional housing with case management and supportive services; and funding for emergency shelter improvements and operations.

3. Contributing Factors of Disproportionate Housing Needs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disproportionate housing needs.

Priority Contributing Factors

- The availability of affordable units in a range of sizes
- Reduced access to homeownership
- Homelessness

Non-Priority Contributing Factors

• Lending discrimination

C. Publicly Supported Housing Analysis

- 1. Analysis
 - a. Publicly Supported Housing Demographics
 - i. Are certain racial/ethnic groups more likely to be residing in one category of publicly supported housing than other categories (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and Housing Choice Voucher (HCV))?

The following data and analysis concerns fair housing issues that may be associated with the location or occupancy of housing that is subsidized or supported in some way by public funds. Specifically, HUD defines publicly supported housing as "housing assisted with funding through federal, State, or local agencies or programs as well as housing that is financed or administered by or through any such agencies or programs." Throughout this analysis, this publicly supported housing stock is broken down into types, one of which is frequently labeled "Other HUD Multifamily," which includes Section 202 and Section 811 units serving the elderly and people with disabilities. Unless specifically stated, this "Other" category does not include LIHTC units or other housing funded by the USDA, the VA, or other federal programs.

Forsyth County contains 1,459 units of public housing, 1,262 units subsidized by projectbased Section 8, and 4,482 Housing Choice Voucher holders. Although Black households make up 26% of the county and account for 45% of the county's very low-income population, 91% of voucher holders and 90% of public housing residents are Black households. Meanwhile white households are far more likely to reside in Project Based Section 8 units than hold a voucher or live in public housing. The total numbers of Hispanic and Asian residents in any type of publicly supported housing were too low to be meaningfully connected to trends in the occupancy of housing units by type.

HAWS' public housing turnover for the period 6/1/2016 through 6/1/2017 is 25%. HAWS opened is Housing Choice Voucher waiting list in April 2010 for one week and received over 6,000 applications. The current waiting list for HCV assistance is approximately 1,500. Forsyth County residents spent less than 6 months on average in 2013 to get into the Public Housing Program, and more than 24 months to get into the HCV program.

Table 10. Publicly Supported Housing Units by Program Category									
Heneine Huite	Forsyth County								
Housing Units	#	%							
Total housing units	161,923	-							
Public housing	1,459	0.90%							
Project-based Section 8	1,262	0.78%							
Other multifamily	298	0.18%							
HCV program	4,482	2.77%							

Source: Decennial Census; APSH

Table 1	1. Publicly	Supported	d Housing	Residents	by Race/	Ethnicity						
		Race/Ethnicity										
Forsyth County	White		Bla	nck	Hisp	anic	Asian or Pacific Islander					
Housing Type	#	%	#	%	#	%	#	%				
Public Housing	111	8.16%	1,220	89.64%	29	2.13%	0	0.00%				
Project-Based Section 8	408	34.34%	734	61.78%	34	2.86%	6	0.51%				
Other Family	78	31.58%	165	66.80%	3	1.21%	1	0.40%				
HCV Program	229	5.94%	3,522	91.36%	98	2.54%	3	0.08%				
0-30% AMI	6,932	40.46%	7,626	44.51%	2,035	11.88%	217	1.27%				
0-50% AMI	12,102	36.07%	13,390	39.91%	4,634	13.81%	292	0.87%				
0-80% AMI	25,599	45.18%	20,100	35.47%	6,941	12.25%	676	1.19%				
Total Households	90,363	64.41%	35,874	25.57%	10,107	7.20%	2,260	1.61%				
Winston-Salem Region												
Public Housing	428	14.19%	2,499	82.86%	87	2.88%	0	0.00%				
Project-Based Section 8	1,051	39.69%	1,498	56.57%	74	2.79%	12	0.45%				
Other Family	200	37.11%	330	61.22%	7	1.30%	2	0.37%				
HCV Program	757	15.47%	4,014	82.04%	114	2.33%	4	0.08%				
0-30% AMI	17,190	57.74%	9,200	30.90%	2,535	8.52%	275	0.92%				
0-50% AMI	29,565	49.89%	16,365	27.61%	5,944	10.03%	394	0.66%				
0-80% AMI	60,425	58.95%	24,618	24.02%	9,293	9.07%	837	0.82%				
Total Households	191,683	75.13%	43,877	17.20%	14,193	5.56%	2,817	1.10%				

	Table 12. Publicly Supported Housing Residents by Race/Ethnicity												
Forsyth County	Total # units (occupied)	% Elderly	% with a disability	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with Children					
Public Housing													
R/ECAP tracts	1,037	15.68%	19.17%	3.53%	94.61%	1.86%	0.00%	44.63%					
Non R/ECAP tracts	345	36.13%	59.25%	21.99%	74.78%	2.93%	0.00%	11.56%					
Project-Based Section	Project-Based Section 8												
R/ECAP tracts	467	75.57%	9.94%	17.09%	80.38%	1.27%	0.84%	13.25%					
Non R/ECAP tracts	717	42.08%	21.84%	45.80%	49.44%	3.92%	0.28%	27.96%					
Other HUD Multifamily	/ Housing												
R/ECAP tracts	52	75.93%	25.93%	32.00%	68.00%	0.00%	0.00%	0.00%					
Non R/ECAP tracts	111	69.28%	12.42%	46.85%	52.25%	0.00%	0.90%	0.00%					
HCV Program													
R/ECAP tracts	1,429	17.65%	16.94%	3.65%	94.85%	1.43%	0.00%	51.31%					
Non R/ECAP tracts	2,518	7.76%	10.48%	7.23%	89.38%	3.19%	0.12%	68.01%					

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

Source: APSH

	Forsyth County										
Development Name	# Units	White	Black	Hispanic	Asian	Households with Children					
Public Housing											
Alder's Point Senior Apartments	50	2%	98%	0%	N/A	N/A					
Arbor Oaks, Phase III B	29	0%	96%	4%	N/A	85%					
Aster Park	57	0%	98%	2%	N/A	74%					
Azalea Terrace	50	2%	98%	0%	N/A	N/A					
Camden Station	30	3%	90%	3%	3%	43%					
Cleveland Avenue Homes	243	3%	95%	2%	0%	62%					
Crystal Towers	201	16%	80%	3%	N/A	N/A					
Healy Drive Towers	105	42%	53%	5%	N/A	N/A					
Piedmont Park	240	5%	93%	2%	N/A	61%					
Providence Place Family Apts.	28	4%	88%	8%	N/A	69%					
Stoney Glen Apartments	48	4%	96%	0%	N/A	89%					
Sunrise Towers	195	7%	92%	1%	N/A	1%					
The Oaks at Tenth	82	4%	96%	0%	N/A	38%					
Town View Apartments	49	0%	100%	0%	N/A	66%					
Willows Peak	52	6%	82%	12%	N/A	72%					
Project-Based Section 8 Housing	Ş										
Arc/Hds Forsyth Co Hous Corp #1	5	N/A	N/A	N/A	N/A	N/A					
Arc/Hds Forsyth Co Hous Corp #2	5	N/A	N/A	N/A	N/A	N/A					
Arc/Hds Forsyth Co Hous Corp #3	5	N/A	N/A	N/A	N/A	N/A					
Arc/Hds Forsyth Co Hous Corp #4	5	N/A	N/A	N/A	N/A	N/A					
Arc/Hds Forsyth Co Hous Corp #5	6	N/A	N/A	N/A	N/A	N/A					
Cherry Hill Apartments	40	5%	93%	3%	N/A	N/A					
Colony Manor	28	24%	52%	21%	3%	83%					
Country Village Apartments	150	76%	14%	9%	1%	N/A					
G. W. Holland Homes	114	22%	73%	4%	N/A	N/A					
Granville Place	100	40%	58%	0%	1%	N/A					
Koerner Place Apartments	80	97%	3%	0%	N/A	N/A					
Rolling Hills Apartments	110	6%	93%	1%	N/A	85%					
Rural Hill Apartments	32	87%	13%	0%	N/A	N/A					
Salem Gardens	150	2%	94%	3%	N/A	71%					
Southgate Apartments	108	6%	94%	0%	N/A	60%					
Spring Hill Apartments	37	22%	72%	0%	3%	N/A					
University Place II Apartments	96	5%	93%	1%	N/A	N/A					
Vespers Apartments	28	21%	61%	4%	11%	N/A					

Table 13. Demographics of Publicly Supported Housing Developments by Program Category (continued)								
	Forsyth County							
Development Name	# Units	White	Black	Hispanic	Asian	Households with Children		
West Hill Apartments	63	59%	40%	0%	N/A	3%		
Winston Summit	100	56%	38%	6%	N/A	1%		
Other HUD Multifamily Assisted	Other HUD Multifamily Assisted Housing							
As Forsyth Co Group Home 01	6	N/A	N/A	N/A	N/A	N/A		
Assembly Terrace Apartments	60	42%	57%	0%	2%	N/A		
Cac of Forsyth County	8	N/A	N/A	N/A	N/A	N/A		
Cac of Forsyth County #2	5	N/A	N/A	N/A	N/A	N/A		
Cac of Forsyth County #3	8	N/A	N/A	N/A	N/A	N/A		
Forsyth County Group Home 06	6	N/A	N/A	N/A	N/A	N/A		
Forsyth County Group Home 07	6	N/A	N/A	N/A	N/A	N/A		
Gladstone Apartments	12	75%	25%	0%	N/A	N/A		
Granville Plaza	42	40%	57%	0%	N/A	N/A		
St. Peter's Heritage Place Apts	42	42%	51%	2%	2%	N/A		
University Court	12	8%	92%	0%	N/A	N/A		

Note: Percentages may not add to 100 due to rounding error. Source: APSH

ii. Compare the demographics, in terms of protected class, of residents of each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant category of publicly supported housing. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.

Based on data in the above tables, Forsyth County's households are 64.4% white, 25.6% Black, 7.2% Hispanic, and 1.6% Asian or Pacific Islander. Comparing these household shares, Black households are overrepresented in all types of publicly supported housing. While making up just over a quarter of the county's households and 45% of its very low-income households, Black households make up 91% of the county's Housing Choice Voucher holders and nearly 90% of its public housing residents. White households (64% of the county's total households) made up just under 6% of voucher holders and 8% of public housing residents. Hispanic and Asian households are also underrepresented in all types of public housing. People of color in Forsyth County are disproportionately affected by poverty, which could partially explain the especially high numbers of Black households living in publicly supported housing. Whereas 8% of white households in Forsyth County are very low-income (incomes up to 30% AMI). 21% of Black households and 20% of Hispanic households fall into this category.

- b. Publicly Supported Housing Location and Occupancy
 - i. Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs.

Generally, publicly supported housing properties, particularly those in Winston Salem's core, are located in segregated communities comprised primarily of Black residents. Only the properties furthest from the city center are located in integrated neighborhoods. However, some differences are present when analyzing the individual types of publicly supported housing. Nearly all public housing properties are located in or adjacent to R/ECAPs and two of the four tracts with highest HCV use are R/ECAPS while the remaining two tracts are adjacent to these areas of concentrated poverty.

Other types of publicly supported housing (Project-Based Section 8, Other HUD Multifamily Assisted developments, and LIHTC) are relatively more widely distributed throughout Forsyth County:

- Only four of 20 properties containing Project-Based Section 8 units are located within R/ECAPs; Of the 16 properties outside R/ECAPs, a few are in segregated areas (some with high concentrations of Black and others with high concentrations of white residents), but most are in racially and ethnically integrated communities.
- Of 11 Other HUD Multifamily properties, just one is located in an R/ECAP and most are in integrated communities outside Winston-Salem's downtown core.
- Five of Forsyth County's 22 LIHTC developments are in R/ECAPs and another three were located adjacent to R/ECAPs in racially segregated areas. The remainder are distributed throughout the county in relatively diverse census tracts.

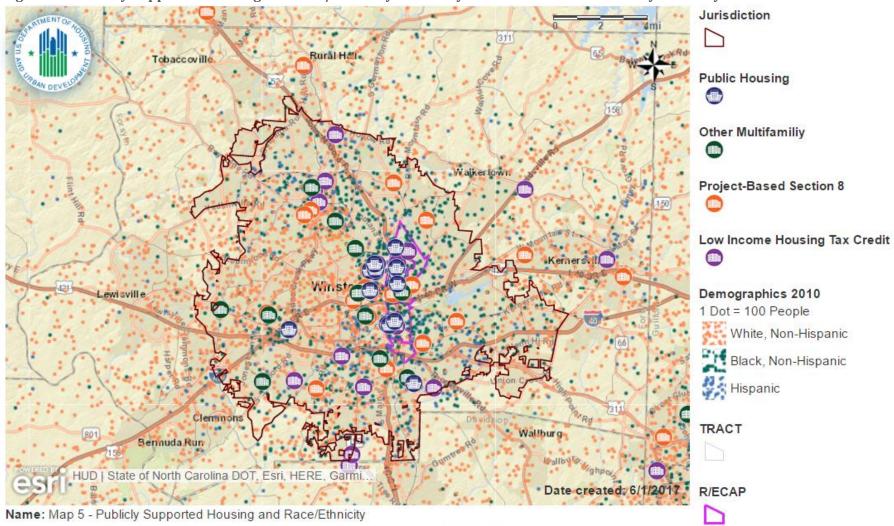


Figure 35. Publicly Supported Housing and Race/Ethnicity in the City of Winston-Salem and Forsyth County

Description: Public Housing, Project-Based Section 8, Other Multifamily, and LIHTC locations mapped with race/ethnicity dot density map with R/ECAPs, distinguishing categories of publicly supported housing by color **Jurisdiction:** Winston-Salem (CDBG, ESG)

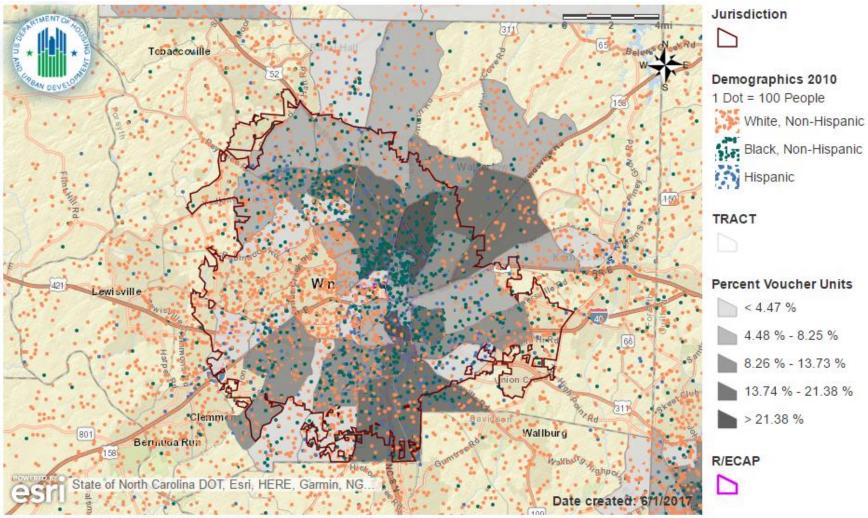


Figure 36. Housing Choice Vouchers and Race/Ethnicity in the City of Winston-Salem and Forsyth County

Name: Map 5 - Publicly Supported Housing and Race/Ethnicity

Description: Public Housing, Project-Based Section 8, Other Multifamily, and LIHTC locations mapped with race/ethnicity dot density map with R/ECAPs, distinguishing categories of publicly supported housing by color **Jurisdiction:** Winston-Salem (CDBG, ESG)

ii. Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs?

Nearly 45% of the public housing units located in R/ECAPs are occupied by families with children; by comparison, only 12% of the public housing units outside an R/ECAP were occupied by families with children. This disparity is less marked for other types of publicly supported housing. In Project Based Section 8 units, families with children made up a 13% share of units within R/ECAPs and a 28% share of those units outside; the figures are 51% in R/ECAPs and 68% outside for voucher holders.

A majority of public housing units outside R/ECAPs house households containing at least one person with a disability, while less than 20% of units located in these areas of concentrated poverty were occupied by people with disabilities. Elderly residents in Project Based Section 8 units and those with a voucher were more likely to reside in units in R/ECAP tracts, but the reverse is true for elderly residents of public housing. Public housing units outside R/ECAPs are more than twice as likely as those inside these tracts to house elderly residents.

iii. How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPs?

As discussed previously, Black households represent 90% of public housing residents while white households are just an 8% share. This disparity increases further when considering the 75% of public housing units that are located in R/ECAPs. Nearly 95% of these units are occupied by Black households, compared with less than 4% occupied by white households. White households occupy a significantly larger share of the county's public housing units that are located outside R/ECAPs: 22%, compared with 75% for Black households. For every type of publicly supported housing studied here, Black households were more likely to live in units in R/ECAPs than not. For white and Hispanic households, the opposite holds true; these households made up larger shares of the occupants of non-R/ECAP units in all cases.

iv. (A) Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category? Describe how these developments differ.

Black households account for between 80% and 100% of the occupants of every individual public housing development in Forsyth County except for Healy Drive Towers, where white households occupy 42% of the units compared with Black residents at 53%. Willows Peak is a relatively diverse public housing property with 6% white, 82% Black, and 12% Hispanic residents. Among Project Based Section 8 developments, some follow similar trends, with Black households occupying 80% or more of the units. However, whereas the largest share of white households at any public housing property was 42%, white households are far more likely to make up the majority of residents at Project Based Section 8 properties. At Koerner Place Apartments, white households are 97% of the residents and Black households make up only 3% of the residents. White households also make up significant percentages of the residents at Rural Hill Apartments (87%) and

Country Village Apartments (76%). West Hill Apartments perhaps most closely match the county's overall demographics with a composition of 59% white and 40% Black residents, however, West Hill has no Hispanic residents and only 3% of the property's households have children.

Some public housing properties are age restricted, with units available only to seniors, however, even among properties that allow families, significant disparities in demographics are apparent in the numbers of resident households with children. Families with children are far more prevalent at Stoney Glen Apartments (89%) and Arbor Oaks (85%) than at other public housing properties, such as The Oaks at Tenth (38%) and Camden Station (43%).

(B) Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing.

The City of Winston-Salem provides gap financing for the construction or rehabilitation of multifamily rental housing using federal (CDBG, HOME) and local funds. See Section 2.a. below. Occupancy in the federally assisted developments is heavily African American. Occupancy in the downtown market-rate developments is more diverse.

v. Compare the demographics of occupants of developments, for each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. Describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.

The demographics of the residents of subsidized housing developments are generally consistent with those of the immediate surrounding community, with a few exceptions. Stoney Glen Apartments is located in a racially and ethnically diverse neighborhood (38% white, 39% Black, 21% Hispanic), yet only 4% of its residents are white and none are Hispanic. Healy Drive Towers and Crystal Towers are both located in diverse neighborhoods and are also among the more racially diverse public housing properties; all other public housing properties are in predominantly African American neighborhoods and their racial compositions are comparable. The three Project Based Section 8 properties with large concentrations of white residents (Koerner Place, Rural Hill, and Country Village) are located in predominantly white communities.

c. Disparities in Access to Opportunity

i. Describe any disparities in access to opportunity for residents of publicly supported housing, including within different program categories (public housing, project-based Section 8, Other HUD Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.

Residents of publicly supported housing tend to face disparities in access to opportunity. Areas where public housing units are primarily sited (central and East Winston) are also some of the lowest-scoring areas on the School Proficiency index. Some Project Based Section 8 and LIHTC units as well as areas with higher HCV use are in areas of the county with marginally better school performance, but the scores in these areas remain quite low. Proximity to jobs and low transportation costs are opportunity factors that are generally available to residents of publicly supported housing of all types. Most locations are in locations that provide better access than average for the county. Despite job proximity and access to affordable transportation options, labor market engagement levels are lowest in the neighborhoods where most public housing developments are located. However, developments outside Winston-Salem's core (especially to the southwest and east) are in areas of greater opportunity related to labor market engagement.

2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about publicly supported housing in the jurisdiction and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD-provided data.

While the Housing Authority supports the operations of multifamily housing, the City of Winston-Salem provides gap financing for the construction or rehabilitation of multifamily rental housing. Developments affordable to very low-income residents completed in the last five years include:

- Abbington Gardens of Winston-Salem New construction of a 96-unit LIHTC development for families, located on the city's northern boundary. The City provided HOME funds.
- Rockwood at Oliver's Crossing New construction of a 64-unit LIHTC development for families, located on the southern county line of Forsyth County. The City provided HOME funds.
- Camden Station New construction of 50 units of public housing for families, located in the Housing Authority's Choice Neighborhoods area, which is a R/ECAP. The City provided local funds.
- Summit Square Garden Apartments Rehabilitation of 96 units, located in the Housing Authority's Choice Neighborhoods area, which is a R/ECAP. The City provided CDBG funds.
- The Enclave New construction of a 68-unit LIHTC development for families, located in the city's northern section. The City provided HOME funds.

In downtown Winston-Salem, residential development in the last five years has been in higherend, market rate housing. The City adopted an affordable workforce housing policy, which requires developments that receive financing from the City to set aside a percentage of units as workforce housing. The City has provided gap financing to two developments downtown:

- 757 North New construction of 115 units of market rate housing. The City provided local funds and required that 25% of units be affordable to households at 80% of area median income.
- Chatham Mill Apartments Historic renovation and conversion of a former textile mill into 166 units of market rate housing. The City provided local funds and required 5% of units be

affordable to households at 80% of area median income and 5% of units be affordable to households at 70% of area median income.

b. The program participant may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or mobility programs.

The Housing Authority has over the past three years undertaken a variety of programs involving direct support for empowering its tenants and participants. HAWS has five programs (LEAD, TEAM, PATH, Wheels for Hope, and CTAP) and a series of regular events, to engage tenants in educational, professional, and related matters.

- LEAD (Learn. Educate. Advance. Degree.) LEAD is a tuition assistance program developed to help tenants between the ages of 18-61 currently residing in our public housing communities remove the barriers associated with financing post-secondary education and training. It is available to all public housing tenants seeking career advancement or change in career in order to take advantage of the "in demand" career opportunities. To date we have had more than 150 tenants who have participated so far. More than 50 participants have attained sustaining full-time/part time employment.
- TEAM (Tenant Empowerment And Motivation) Townview HAWS partnered with the Bethesda Center to create a project designed to take a holistic approach to the 49 households in the Townview community and educate them on how to become self-sufficient. The holistic comprehensive services were provided to each individual living in the household. Assessments were conducted by the onsite case manager to determine the barriers and needs of each tenant. Upon completion of the assessments, the results would determine the coordination of services the tenant will require to successfully become self-sufficient. Bethesda Center employed a case manager to coordinate services for the work activity requirement. The case manager worked with each tenant to find or maintain employment in order to sustain their housing. Each of the 49 household members including those listed on their lease were assessed and utilized the program to maintain employment in order to sustain their housing.
- PATH Program (People Achieving Their Highest) A program designed to assist public housing tenants in reducing their dependency on governmental subsidies for family support while helping them to grow out of poverty. The coordinator identified barriers through a formal assessment and intake process which is then developed into an Individual Employment/Career Plan and/or Educational Plan for each tenant. The plan will identify specific goals and objectives as well as the needed supportive services that will eliminate barriers. We currently have 100 tenants enrolled in the program and working towards achieving their goals set forth in their individual/employment career plans.
- Wheels 4 Hope program Lack of transportation options is a severe problem for many public housing residents. Therefore, we've been partnering with Wheels4Hope, a faith-based, volunteer-driven, nonprofit organization dedicated to providing affordable and reliable transportation to economically vulnerable families and individuals who are referred by one of our partner agencies and who are working towards self- sufficiency. The agency works

diligently for 6-8 weeks to prepare a safe and dependable car for referred tenants. This is program is newly introduced; however, we have had one car blessing recipient. We continue to spread the word about the program and hope to have more tenants obtain transportation through the program.

• Construction Trainee Apprenticeship program – HAWS and Goodwill Industries have cosponsored a program created to assist public housing tenants obtain employment and obtain training in a trade in the construction industries through training and experience in order to obtain employment after the program has ended.

3. Contributing Factors of Publicly Supported Housing Location and Occupancy

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, RECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.

Priority Contributing Factors

- Impediments to mobility
- Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs

Non-Priority Contributing Factors

- Lack of private investment in specific neighborhoods
- Lack of public investment in specific neighborhoods, including services and amenities

D. Disability and Access Analysis

1. Population Profile

a. How are persons with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?

In Forsyth County, an estimated 11.17% of persons over the age of 5 have a disability, comparable to the City of Winston-Salem's disability rate of 11.41%, but lower than that of the region at 13.35%. Those with hearing difficulties are relatively evenly distributed throughout the county, but those with other types of difficulties appear more clustered. Clusters of people with vision impairments exist in Kimberly Park and Bowen Thomas Park neighborhoods, both of which are segregated and predominantly African American communities. Another cluster is located in the Reynolds Park area, a neighborhood that is slightly more diverse. Those with cognitive difficulties tend to cluster in and around central Winston-Salem, especially in the vicinity of Cleveland Avenue, with additional concentrations in the neighborhoods just north of Wake Forest University and surrounding the I-40 and US-421 junction on the west side of the city. People with ambulatory, self-care, and independent living disabilities appear clustered, largely in the same neighborhoods already described as having concentrations of people with disabilities.

Table 14. Disability by Type								
Disability Type	City of Winston- Salem		Forsyth County		Winston-Salem Region			
	#	%	#	%	#	%		
Hearing difficulty	5,040	2.37%	8,456	2.58%	20,568	3.44%		
Vision difficulty	3,937	1.85%	5,751	1.76%	13,815	2.31%		
Cognitive difficulty	9,425	4.43%	14,074	4.30%	30,469	5.09%		
Ambulatory difficulty	13,554	6.37%	19,921	6.08%	43,669	7.30%		
Self-care difficulty	4,714	2.22%	7,170	2.19%	15,504	2.59%		
Independent living difficulty	9,480	4.46%	14,303	4.37%	29,623	4.95%		

Note: All % represent a share of the total population within the jurisdiction or region. Source: Decennial Census; ACS

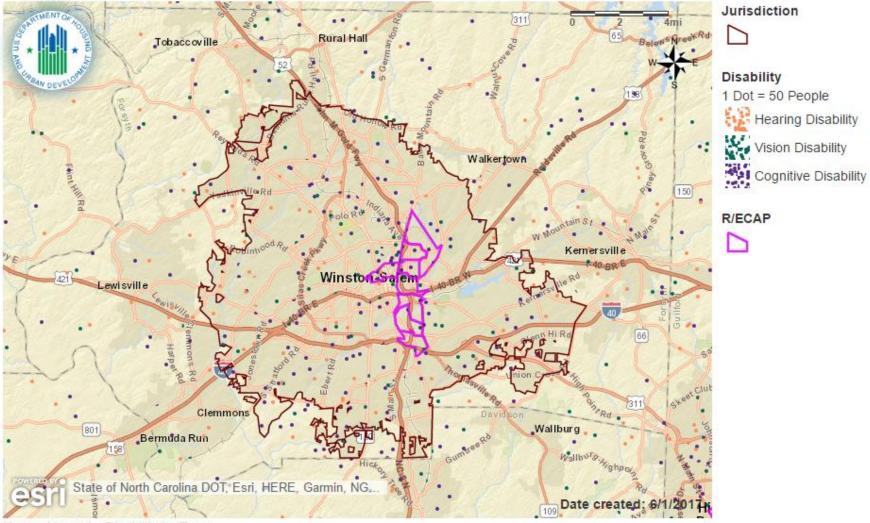


Figure 37. Persons with a Hearing, Vision, or Cognitive Disability in the City of Winston-Salem and Forsyth County

Name: Map 14 - Disability by Type

Description: Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region **Jurisdiction:** Winston-Salem (CDBG, ESG)

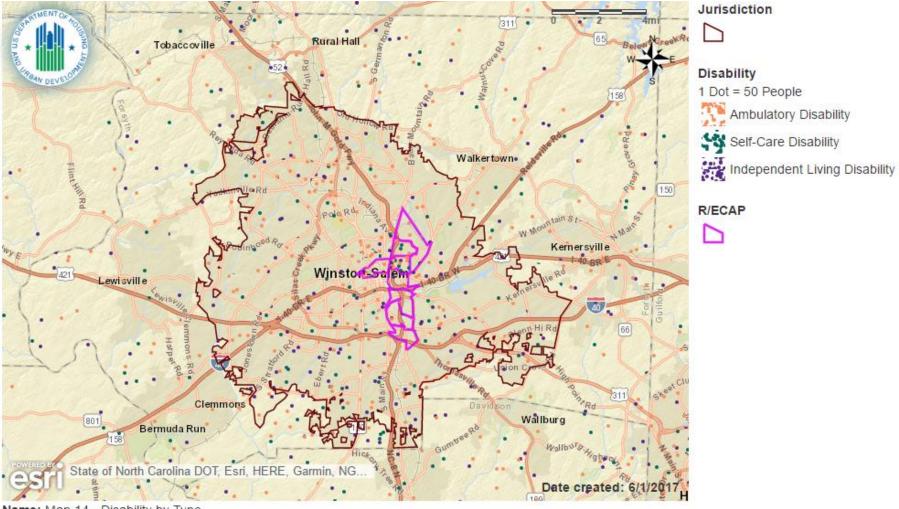


Figure 38. Persons with an Ambulatory, Self-Care, or Independent Living Disability in the City of Winston-Salem and Forsyth County

Name: Map 14 - Disability by Type

Description: Dot density map of the population of persons with disabilities by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region **Jurisdiction:** Winston-Salem (CDBG, ESG)

b. Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges.

Children and youth with disabilities are most likely to live in central Winston-Salem with additional clustering in the neighborhoods along Bethabara Road, north of the Wake Forest campus. Among those between 18 and 64 years old, the most significant clusters of people with disabilities are in central Winston-Salem (west of Highway 52, between Northwest Boulevard and 6th Street) and generally the south-central portion of Forsyth County. Seniors aged 65 and older clustered in the Cherry Hill/Kimberly Park area and along the Stratford Road and Thurmond Street corridors.

Table 15. Disability by Age Group								
Age of People with Disabilities	City of Winston- Salem		Forsyth County		Winston-Salem Region			
Disabilities	#	%	#	%	#	%		
Age 5-17 with disabilities	1,749	0.82%	2,498	0.76%	6,124	1.02%		
Age 18-64 with disabilities	12,844	6.04%	19,456	5.94%	42,208	7.06%		
Age 65+ with disabilities	9,670	4.55%	14,625	4.47%	31,533	5.27%		

Note: All % represent a share of the total population within the jurisdiction or region. Source: ACS

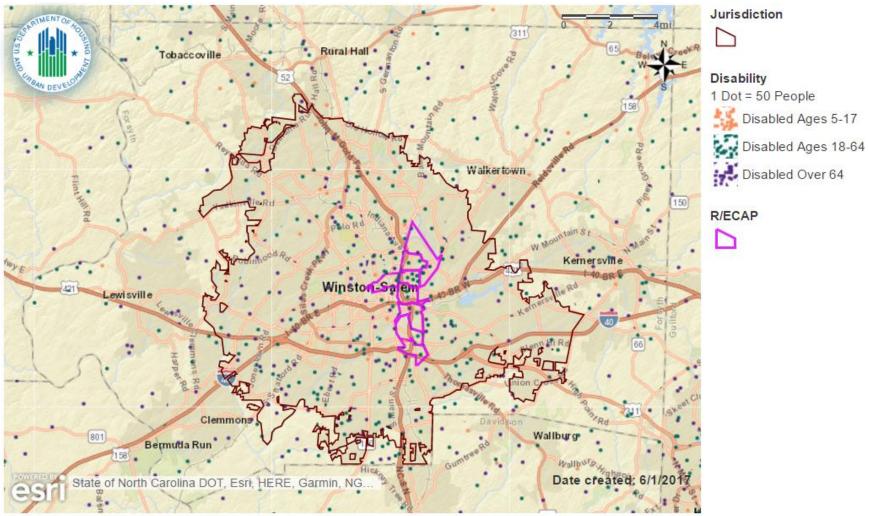


Figure 39. Persons with a Disability by Age in the City of Winston Salem, Forsyth County

Name: Map 15 - Disability by Age Group

Description: All persons with disabilities by age range (5-17)(18-64)(65+) with R/ECAPs **Jurisdiction:** Winston-Salem (CDBG, ESG)

2. Housing Accessibility

a. Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.

Stakeholder input indicates that, while the region has been working to add more accessible housing, the current supply is not sufficient to meet the population's needs for affordable, accessible housing in a range of unit sizes. Several issues and barriers to housing accessibility were identified, including:

- Permanent supportive housing is needed for those with disabilities whose incomes are under 30% of the area median income. No other existing housing programs meet this need.
- While there is a range of group homes available, the individual needs of people with disabilities are diverse and finding housing to meet individual needs can be difficult.
- People with mental disabilities do not have sufficient housing options and often become homeless as a result.
- There are not enough accessible apartments; affordability is also an issue.
- Given the region's aging population, the need for accessible housing will only increase.

b. Describe the areas where affordable accessible housing units are located. Do they align with R/ECAPs or other areas that are segregated?

HUD's Affordable Apartment Search Tool identifies a total of 13 affordable rental properties in Forsyth County designed to serve people with disabilities. All but one of the properties have Winston-Salem addresses, the other being located in Kernersville. A point-in-time search on socialserve.com for affordable accessible apartments currently for rent in the Winston-Salem area returned 11 results. Of those, seven were located in racially diverse neighborhoods and four were in segregated areas. Of those four, two were in R/ECAP tracts.

c. To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing?

As the table below shows, persons with disabilities are able to access various types of publicly supported housing. Nearly 30% of public housing residents are disabled. Public housing units in Forsyth County are more likely than other types of publicly supported units to house people with disabilities. Nearly 30% of these units are home to someone with a disability. Project Based Section 8 units follow, where about 17% of resident households include someone with a disability. The Housing Choice Voucher program houses a lower share of people with disabilities (only 12.82% of households with a voucher have a member with a disability), yet in absolute terms, more voucher units house people with disabilities than do public housing, Project Based Section 8, or any other supported housing type.

Table 16. Disability by Publicly Supported Housing Program Category							
	People with a Disability						
	Forsyth County Winston-Salem Region						
Housing Type	#	%	#	%			
Public Housing	403	29.22%	867	28.40%			
Project-Based Section 8	212	17.18%	492	17.57%			
Other Multifamily Housing	33	11.19%	66	10.05%			
HCV Program	502	12.82%	713	14.25%			

Note: The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs. Source: ACS

- **3.** Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings
 - a. To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?

The American Community Survey does not provide data regarding the number of persons with disabilities who reside in institutional settings, and no count is available locally. Inpatient behavioral health services in Winston-Salem are offered by Novant Health at Forsyth Medical Center and by Old Vineyard Behavioral Health Services. Both of these facilities are located near the I-40 and US-421 junction on the west side of the city. This is an area that is well-integrated, with demographics roughly approximating those of the county as a whole.

b. Describe the range of options for persons with disabilities to access affordable housing and supportive services.

The Housing Authority of Winston-Salem reports that five percent of the housing it provides is accessible to persons with disabilities. In addition to HAWS properties, the private market supplies some affordable housing that is accessible to people with disabilities, however, such housing options are scarce. As reported above, HUD's Affordable Apartment Search Tool identifies a total of just 13 affordable rental properties in Forsyth County designed to serve people with disabilities. A search on socialserve.com for affordable accessible apartments currently for rent in the Winston-Salem area returned 11 results. Of course, a resident's required accessibility features vary depending on her disability. An apartment advertised as accessible because it has wide doorways and a zero-step entry may not be accessible to someone with a vision, hearing, or cognitive impairment. Given the very limited options returned in a search for rental housing that is accessible only in a general sense, it is likely that available options would be further limited depending on the specific features sought by a prospective tenant with a disability.

The availability of supportive services represents another important need. Stakeholders representing HAWS described particular need for supportive housing for people with mental disabilities, as these residents typically have incomes below 30% AMI and are unable to afford

even other "affordable" housing (that often targets households with incomes of 60% AMI), and they require specialized supportive services in order to maintain stability. Despite the need, funding available for such services and case management is minimal.

4. Disparities in Access to Opportunity

- a. To what extent are persons with disabilities able to access the following? Identify major barriers faced concerning:
 - i. Government services and facilities
 - ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)
 - iii. Transportation
 - iv. Proficient schools and educational programs
 - v. Jobs

Access to government facilities, public infrastructure, and transit can be a considerable barrier for persons with disabilities, and can impact their ability to access educational and employment opportunities. The *Legacy 2030* Comprehensive Plan, which covers Forsyth County and all its municipalities (including Winston-Salem) outlines several policy priorities related to improving access to opportunity for people with disabilities. Among the countywide policies and action items are these:

- Create communities that are friendly and accessible places for older and disabled people.
- Collaborate with community organizations to help remove barriers to mobility and access to public and private facilities and services.
- Consider employing design principles that enable all community members, regardless of age or disability, to access services, social activities and opportunities for physical activity without special or separate design.
- Locate health and human service facilities to ensure easy accessibility, equitable distribution, and compatibility with adjoining uses
- Ensure that affordable transportation services are available to and from health and other community facilities, especially for the elderly, special needs, minority, and low-income groups.
- Expand the system of transit services for seniors and persons with disabilities to cover the entire county.
- Encourage and facilitate universal building design techniques that enable seniors and special needs persons to stay in their homes and neighborhoods.
- Facilitate the development of affordable housing for seniors and people with special needs, including accessory dwelling units or granny flats to allow them to age in place, as well as independent living and assisted living facilities.

Ambulatory difficulties are the most common type of barriers faced by Forsyth County residents who have a disability, affecting 6% of the county's population – nearly 20,000 people. For these residents, transportation and mobility barriers may keep them from physically accessing buildings and using infrastructure to get around their community. The *Legacy 2030* policies and action items described in the Comprehensive Plan emphasize the importance of addressing these barriers and, in fact, outline specific strategies for doing so.

b. Describe the processes that exist in the jurisdiction and region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.

Winston-Salem and Forsyth County have adopted a single Unified Development Ordinance governing zoning, environmental, and subdivision regulations. The ordinance specifically directs that persons with disabilities may request a reasonable accommodation to zoning and land use requirements by applying to either the Board of County Commissioners or the Winston-Salem City Council. It is important that this process with its own criteria is separate from the variance or special use permit processes because the criteria for variance and special use permits differ from standards which govern fair housing decision-making. However, the reasonable accommodation ordinance currently lacks specificity as to the form that the request should take; the timeframe within which the reviewing authority must make a decision; the form that a decision must take and whether conditions may be attached; and how to appeal a decision. Further, decisions by the Board of County Commissioners or the City Council must generally meet the notice requirements of the public hearing process. Subjecting the requestor to the public hearing process, where there is the potential for community opposition based on stereotypical assumptions about people with disabilities and unfounded speculations about the impact on neighborhoods or threats to safety, may unjustly impact the outcome of the decision-making body.

c. Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities.

The American Community Survey does not provide tenure or homeownership rates for persons with a disability or by disability type, nor is this data available locally. Stakeholder input suggests some factors that are barriers to homeownership generally and in some cases, the degree of these difficulties could be greater for those with a disability.

- Difficulty qualifying for a mortgage due to employment history or income
- Discrimination and/or steering by lenders and real estate agents
- Unfamiliarity with the process of homeownership; few friends or relatives who have previously gone through the experience

5. Disproportionate Housing Needs

a. Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities.

HUD's Comprehensive Housing Affordability Strategy (CHAS) data provided for this analysis does not identify levels of housing need for persons with disabilities or by disability type. Input received from stakeholders who work with clients with mental and physical disabilities indicate that cost burdens are an issue for this group, and that the supply of accessible units and permanent supportive housing units is very limited. Disabled persons who are unable to work and receive Supplemental Security Income (SSI) payments receive \$735 per month, which translates to an affordable rent of \$220 or less. With such limited incomes, this group is highly likely to face a cost burden or severe cost burden. Disabled seniors are also more likely to face a cost burden if their incomes decline as they reach retirement, especially if they rent their homes.

6. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region affecting groups with other protected characteristics.

The City provided local funds for rehabilitation at The SECU Commons, which provides transitional housing for high functioning adults on the autism spectrum, youth aging out of foster care, and homeless families with minor children. The Continuum of Care identified these subpopulations as having a need for housing and services that were not being met.

b. The program participant may also describe other information relevant to its assessment of disability and access issues.

See the discussion of disability-related housing discrimination complaints provided in the Fair Housing Enforcement, Outreach Capacity, and Resources Analysis.

7. Disability and Access Issues Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disability and access issues and the fair housing issues, which are Segregation, RECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor, note which fair housing issue(s) the selected contributing factor relates to.

Priority Contributing Factors

- Lack of affordable, integrated housing for individuals who need supportive services
- Land use and zoning laws
- State or local laws, policies, or practices that discourage individuals with disabilities from being placed in or living in apartments, family homes, and other integrated settings

Non-Priority Contributing Factors

• Lack of affordable, accessible housing in range of unit sizes

E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

8. List and summarize any of the following that have not been resolved: a charge or letter of finding from HUD concerning a violation of a civil rights-related law, a cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law, a letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law, or a claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing.

For the period January 2012 through April 2017, no significant cases or precedential decisions of alleged housing discrimination occurring in Winston-Salem or Forsyth County were found to have resulted in federal litigation or a HUD ALJ decision.

9. Describe any state or local fair housing laws. What characteristics are protected under each law?

North Carolina has adopted a parallel version of Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988, 42 U.S.C. §§ 3601 et seq. (the "Fair Housing Act"), known as the State Fair Housing Act (N.C. GEN. STAT. § 41A-1 et seq.). Both the federal and state laws prohibit discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on sex, race, color, disability, religion, national origin, or familial status. The state law does not extend protections to any other class of persons outside of those protected by the federal FHA.

The state law does make it an additional unlawful discriminatory housing practice for a local government to discriminate against "affordable housing" in land-use decisions or in the permitting of development where a development or proposed development contains affordable housing units for families or individuals with incomes below 80% of area median income. (GEN. STAT. §§ 41A-4(g); 41A-5(a)(4),(5)). It is not a violation of this provision if the local land-use decision or permitting of development is based on considerations of limiting high concentrations of affordable housing.

Winston-Salem also has adopted a local fair housing ordinance to establish local procedures for executing fair housing laws and policies and protecting against discriminatory housing practices. CODE OF ORDINANCES Sec. 38-101 et seq.

10. Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.

The Winston-Salem region has three primary sources of fair housing information, outreach, and enforcement. The State of North Carolina and the City of Winston-Salem both have human relations commissions that hold fair housing responsibilities. Additionally, HUD – through its Atlanta Regional Office of Fair Housing and Equal Opportunity and North Carolina Field Office – is a significant source of capacity for fair housing initiatives in the region.

HUD has designated North Carolina's Human Relations Commission (under the Department of Administration) and the City of Winston Salem's Human Relations Commission as participating agencies in HUD's Fair Housing Assistance Program (FHAP). FHAP designees receive HUD funds for enforcement of state and local fair housing laws that HUD has determined to be "substantially equivalent" to the federal FHA. This means that the state and local fair housing provisions being enforced provide rights, remedies, procedures, and the availability of judicial review that are substantially equivalent to the federal Fair Housing Act.

The North Carolina Human Relations Commission, under the office of administration, is tasked with ensuring equal opportunities in the areas of employment, housing, public accommodations, recreation, education, justice, and governmental services for all North Carolina citizens. The Commission has authority to enforce the State Fair Housing Act. At times, and as recently as 2015, state lawmakers have proposed eliminating the state's Human Relations Commission and the State

Fair Housing Act, purportedly for budgetary reasons. However, the latest state budget leaves the Commission and Act in place for now.

Among the several duties of the Winston-Salem Human Relations Commission/Human Relations Department (WSHRC/HRD), is to execute the powers assigned to it in accordance with the Fair Housing Ordinance of the City of Winston-Salem, Chapter 38 of the City Code. Anyone claiming to be aggrieved by a discriminatory practice that violates of the City's Fair Housing Ordinance may file a written, verified complaint with the WSHRC within one year after the alleged violation occurred or terminated. The WSHRC has the power to receive or initiate complaints, investigate allegations of discrimination contained in the complaint, seek conciliation and settlement among the parties, hold evidentiary hearings and make findings of fact and conclusions of law. If the hearing board finds reasonable cause to believe a violation of the Fair Housing Ordinance has occurred and conciliation agreement cannot be reached, the WSHRC, with approval of the city council, may initiate a lawsuit against the respondent in the county superior court.

Finally, Region IV of HUD's Office of Fair Housing and Equal Opportunity (FHEO) receives complaints by households regarding alleged violations of the Fair Housing Act for cities and counties throughout Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, and Tennessee. The mission of the FHEO is to eliminate housing discrimination, promote economic opportunity, and achieve diverse, inclusive communities. To achieve this mission, the FHEO receives and investigates complaints of housing discrimination, and leads in the administration, development, and public education of federal fair housing laws and policies.

11. Additional Information

a. Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region.

An individual who believes he or she has been the victim of an illegal housing practice under the FHA may file a complaint with the appropriate HUD Regional Office of Fair Housing and Equal Opportunity (FHEO) within one year of when the discriminatory practice occurred. The aggrieved party also may file a lawsuit in federal district court within two years of the discriminatory act (or in the case of multiple, factually-related discriminatory acts, within two years of the last incident). Where an administrative action has been filed with HUD, the two-year statute of limitations is tolled during the period when HUD is evaluating the complaint.

Like the federal FHEO complaint process, the State and City Human Relations Commissions are empowered to receive complaints of alleged housing discrimination within their respective jurisdictions, investigate claims, subpoena witnesses and documents, seek conciliation and settlement between parties, conduct reasonable cause hearings, and commence civil actions in court (the appropriate county superior court) to seek redress of unlawful housing discrimination. Under the state and local fair housing laws, complainants may potentially be awarded compensatory and injunctive relief, as well as punitive damages.

An aggrieved party may also opt to bypass these administrative routes and file a civil action directly in federal district court or state superior court, thus maintaining control of the case and the potential to collect punitive damages. Civil litigation is generally available without first exhausting administrative remedies.

Housing discrimination claims may be brought against local governments and zoning authorities and against private housing providers, mortgage lenders, or real estate brokers.

Complaints filed with HUD

From January 2012 through April 2017, HUD received 48 formal complaints of housing discrimination within the jurisdictions of Forsyth County, 45 of which occurred within the City of Winston Salem. One case occurred in Kernersville, one in Lewisville, and one in Rural Hall.

As of April 15, 2017, 10 of the 48 reported cases remained open; 1 case was withdrawn by the complainant after resolution; 4 cases were withdrawn by the complainant without resolution; and 8 cases were successfully conciliated by HUD. In two of the eight settled cases, the complainant was entitled to receive a monetary award of \$1,200 in one case and \$2,370 in the second. Over half of the cases, 25 of the 48 cases, were closed administratively due to a no cause determination by HUD following its investigation into the allegations and a lack of sufficient evidence to conclude that discrimination had occurred.

Table 17. Fair Housing Complaints by Basis – Filing Date Jan. 2012—April 2017							
Basis	2012	2013	2014	2015	2016	2017	Total
Race	4	2	3	2	5	4	20
National Origin	6	2	1	1	1	0	11
Religion	0	0	0	0	1	0	1
Sex	1	4	1	1	6	0	13
Disability	1	4	2	3	5	4	19
Familial Status	2	2	0	1	1	0	6
Retaliation	0	2	3	0	3	1	9
Total Bases	14	16	10	8	22	9	79
Total Complaints	10	9	6	5	14	4	48

More than one basis of discrimination may be cited in a single complaint. Thus, the 48 complaints filed and cases opened represent a total of 79 bases of discrimination. Race was the most often cited basis of discrimination with 20 counts, approximately a quarter of the total bases and occurring in approximately 42% of the cases, followed closely by disability with 19 counts (approximately 40% of cases), sex with 13 counts (approximately 27% of cases), and national origin with 11 counts (approximately 23% of cases). Of the 8 cases which HUD help to mediate a conciliation or settlement agreement, disability was an issue in 6 of those.

Complainants also may cite more than one discriminatory act or practice, recorded as the discriminatory *issue*.

The 48 complaints filed cited 107 discriminatory actions or practices. "Discriminatory terms, conditions, privileges, or services and facilities," drawn from Sec. 804 of the FHA, was the most often violation alleged, followed by "discriminatory acts under Sec. 818 (coercion etc.), and discriminatory refusal to rent.

In the eight cases which HUD settled, the respondents did not necessarily admit liability, but may have settled to avoid further expense, time, and the uncertainty of litigation.

Table 18. Fair Housing Complaints by Issue – Filing Date Jan. 2012—April 2017					
Issue	Total				
Discriminatory advertising, statements and notices	4				
Discriminatory terms, conditions, privileges, or services and facilities	19				
Discriminatory acts under Section 818 (e.g., coercion etc.)	18				
Discrimination in terms/conditions/privileges relating to rental	10				
Non-compliance with design and construction requirements	1				
Discriminatory refusal to rent	17				
Discriminatory refusal to negotiate for rental	3				
Discriminatory refusal to rent and negotiate for rental	3				
Discrimination in services and facilities relating to rental	3				
Otherwise deny or make housing unavailable	9				
Failure to make reasonable accommodation	10				
Discrimination in the terms/conditions for making loans	1				
Use of discriminatory indicators	1				
False denial or representation of availability – rental	4				
Other discriminatory acts	4				
	107				

Complaints filed with the North Carolina Human Relations Commission

The North Carolina Human Relations Commission, which maintains complaint data by counties, reported that it had received six complaints of housing discrimination in Forsyth County for the period January 1, 2012, through April 30, 2017. Three of the six cases were referred to the Commission by HUD for investigation and disposition.

Table 19. North Carolina Human Relations Commission Complaint Data Jan. 1, 2012 – April 30, 2017							
Date	Basis	Referral Source	Case Status	Decision / Disposition			
04/30/13	Intimidation / Harassment	HUD	Closed 9/13/13	No cause.			
03/11/14	Race	HUD	Closed 4/24/14	No cause.			
07/23/14	Retaliation	HUD	Closed 10/13/14	No cause.			
11/03/15	Race Sex Handicap	HUD	Open for investigation as of 5/18/17				
12/14/15	Race	NCHRC	Open for investigation as of 5/18/17				
04/26/17	Handicap	NCHRC	Open for investigation as of 5/18/17				

Race was reported as a basis for complaint in three of the six cases filed with or referred to the Commission. Handicap/disability was cited in two cases; sex in one case; retaliation in one case;

and intimidation/harassment in one case. Three of the six cases have been closed after a no cause determination following the Commission's investigation of the allegations. Three cases were still pending and open for investigation as of May 18, 2017.

Complaints filed with the Winston-Salem Human Relations Commission

The WSHRC reported the following data regarding fair housing complaints it received for the period January 1, 2012 through May 10, 2017.

Table 20. Winston-Salem Human Relations Commission Complaint Data by Basis/Bases, Jan. 1, 2012 – May 15, 2017							
Basis	2012	2013	2014	2015	2016	2017	Total
Race	3	3	2	2	5	3	18
Sex/gender	1	3	1	1	5	0	11
Religion	0	0	0	1	0	0	1
Disability/handicap	1	3	3	5	4	3	19
National Origin	5	1	1	1	0	0	8
Familial Status	2	2	0	2	0	1	7
Retaliation	0	0	0	0	2	0	2
Total Bases	12	12	7	12	16	7	66
Total Complaints	9	6	5	9	13	5	47

Over the relevant period, the WSHRC received and opened 47 cases of alleged unlawful discrimination in housing, representing a total of 66 bases of discrimination. Disability was the most cited basis of discrimination reported, occurring in 19 reported cases, equaling approximately 40% of cases, followed by race in 18 reported cases (approximately 38%), and sex/gender in 11 reported cases (approximately 23%).

WSHRC did not report the types of issues or prohibited discriminatory acts that were alleged by complainants.

Of the 47 complaints filed with the WSHRC from January 1, 2012 to May 10, 2017, four cases were withdrawn before a full investigation or cause/no cause determination could be made; one case was reported as withdrawn with resolution; and one case was administratively closed. The WSHRC concluded that 19 (or approximately 40%) of the 47 cases lacked reasonable cause to believe that a violation of the Fair Housing Ordinance had occurred, and closed those cases following a "no cause" determination. Seven of the cases were settled through conciliation, with three of those reported as including a monetary settlement in amounts ranging from \$730 to \$3,000. Eleven of the cases were reported to still be pending and open as of May 10, 2017.

b. The program participant may also include information relevant to programs, actions, or activities to promote fair housing outcomes and capacity.

The City of Winston-Salem's Human Relations Department, under the guidance of the Human Relations Commission, conducts activities within its jurisdiction to affirmatively further fair housing and protect the rights of citizens to obtain housing of their choice. The Department has two full-time Human Relations Specialists to carry out these activities, both of whom are bilingual and one of whom has the duties of a bilingual investigator and Hispanic outreach coordinator. In

addition, through the HUD FHAP grant, the Department has a bilingual intake specialist for case processing and conducting specialized fair housing outreach. Outreach activities include Trust Talks to discuss issues between communities of color and police or between communities of color; fair housing training for landlords, tenant associations, City employees, and interested non-profits; and intercultural events to ensure that all citizens learn about, respect, and appreciate the various cultures that are represented within the City.

The City's Human Relations Department also recognizes local organizations committed to furthering fair housing opportunity and equal treatment in the Winston-Salem community with its annual Breaking Barriers Award. The award is given to community agencies, organizations, businesses, or non-profits that create affordable fair housing choices, educate the community about fair housing rights, or remove impediments to renting or purchasing safe and decent housing. The City's inaugural award was presented to the Winston-Salem office of the Legal Aid Society of North Carolina, Inc. in 2014. Most recently, the Breaking Barriers Award was given to City With Dwellings, which works to address poverty and homelessness in Winston-Salem.

12. Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing enforcement, outreach capacity, and resources and the fair housing issues, which are Segregation, RECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each significant contributing factor, note which fair housing issue(s) the selected contributing factor impacts.

Priority Contributing Factor

• Lack of resources for fair housing agencies and organizations

VI. Fair Housing Goals and Priorities

1. For each fair housing issue, prioritize the identified contributing factors. Justify the prioritization of the contributing factors that will be addressed by the goals set below in Question 2. Give the highest priority to those factors that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance.

Listed in the table below are the fair housing issues with their associated contributing factors. The contributing factors are organized into two groups: *priority contributing factors* are those that are most likely to limit or deny fair housing choice or access to opportunity; *non-priority contributing factors* are likely to also have a causal relationship to the fair housing issue, but are less directly or immediately able to remedy the named issue.

	Table 21. Contributing Factors by Priority Level							
Housing Issue	Priority Contributing Factors	Non-Priority Contributing Factors	Priority Justification					
Segregation/ Integration	 Lack of community revitalization strategies Lack of private investments in specific neighborhoods Lack of public investments in specific neighborhoods, including services or amenities Location and type of affordable housing 	 Community opposition Lending discrimination 	Facing housing needs at disproportionately higher rates than whites, African Americans make up about 90% of public housing residents and voucher holders. Nearly all public housing is located in or adjacent to R/ECAPs, and the four census tracts with highest HCV use are also in or adjacent to R/ECAPs. Stakeholders note that segregated areas, particularly those with high shares of African American populations, lack private investment, particularly with respect to grocery stores, banks, and other businesses. Some stakeholders also noted differing levels of public investment, and access to opportunity data indicated lower levels of school proficiency.					

Racially/ Ethnically Concentrated Areas of Poverty	 Deteriorated and abandoned properties Lack of community revitalization strategies Lack of private investments in specific neighborhoods Lack of public investments in specific neighborhoods, including services or amenities Location and type of affordable housing 	Lending discrimination	Many stakeholders noted a lack of private investment in R/ECAP neighborhoods, and several also identified differing levels of public investment with respect to some services and amenities. As noted above, public housing units, occupied primarily by African American households, are almost all within R/ECAP or adjacent tracts. HCV use is also concentrated in R/ECAPs and adjacent tracts.
Disparities in Access to Opportunity	 Location and type of affordable housing Location of proficient schools and school assignment policies Access to jobs – education attainment, job training, job search assistance, hiring practices 	 Lack of private investments in specific neighborhoods Lack of public investments in specific neighborhoods, including services or amenities 	Locating new housing units in neighborhoods with good access to opportunity is a more direct strategy than investing in programs designed to boost opportunity in communities where it is lacking – but both approaches are essential. While general private and public investments in communities with low levels of opportunity may be helpful, targeted investment (such as funding for enhancement of educational and job training programs) are more likely to have a direct and immediate impact on the opportunities available in neighborhoods.
Disproportionate Housing Needs	 The availability of affordable units in a range of sizes Reduced access to homeownership Homelessness 	Lending discrimination	Needs related to housing needs (specifically affordability), homeownership, and homelessness all disproportionately affect African American households. Latino households are also disproportionately likely to be impacted by housing affordability needs and reduced homeownership levels.

Publicly Supported Housing Location and Occupancy	 Impediments to mobility Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs 	 Lack of private investment in specific neighborhoods Lack of public investment in specific neighborhoods, including services and amenities 	One-third of households with HCVs live in R/ECAP communities, suggesting that impediments to mobility are likely to exist. Additionally, siting new publicly supported housing developments in communities of choice that are integrated and have opportunities available to residents will have a direct impact on the housing choice available to residents of this type of housing. Improvements that bring increased services and amenities to R/ECAP or segregated communities are needed, but are less likely to result in immediate improvements to fair housing choice.
Disability and Access Issues	 Lack of affordable, integrated housing for individuals who need supportive services Land use and zoning laws State or local laws, policies, or practices that discourage individuals with disabilities from being placed in or living in apartments, family homes, and other integrated settings 	• Lack of affordable, accessible housing in range of unit sizes	Based on stakeholder input, the largest limitation on housing choice for people with disabilities is the availability of supportive housing options. Certain zoning restrictions limit the spacing of some integrated housing types that serve people with disabilities and the ability of residents to seek accommodation of their disabilities in housing. While a general lack of affordable, accessible housing is a factor, little mention was made of the range of available unit sizes being a concern.
Fair Housing Enforcement, Outreach Capacity, and Resources	• Lack of resources for fair housing agencies and organizations		A noteworthy infrastructure of fair housing agencies and organizations exists within Forsyth County and the City of Winston-Salem, however, the impact of these organizations is limited by the funding and other resources allocated to them. As described in Part IV of this AFH, the resource limitations prevent and/or slow implementation of established fair housing goals and initiatives.

2. For each fair housing issue with significant contributing factors identified in Question 1, set one or more goals. Explain how each goal is designed to overcome the identified contributing factor and related fair housing issue(s). For goals designed to overcome more than one fair housing issue, explain how the goal will overcome each issue and the related contributing factors. For each goal, identify metrics and milestones for determining what fair housing results will be achieved, and indicate the timeframe for achievement.

	Table 22. Fair Housing Goals							
Goal	Priority Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant(s)				
1. Implement place-based community investment strategies to increase opportunity measures in R/ECAPs	 Location and type of affordable housing Lack of public investment in specific neighborhoods Lack of private investment in specific neighborhoods Lack of community revitalization strategies Deteriorated and abandoned properties Access to jobs Location of proficient schools and school assignment policies Access to homeownership Siting selection policies, practices, and decisions for publicly supported housing 	 R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs Publicly Supported Housing 	 Choice Neighborhoods: Complete New Hope Manor (Q4, FY18) New construction or rehabilitation of 10 housing units per year HAWS will examine its policy on timing to build rental vs. homeownership (Q2, FY18) Construct and/or rehab housing in City targeted neighborhoods, e.g., Boston Thurmond, Bowen Park/Dreamland, or others. Related metrics are included in Goals 4 and 5. Explore asset tracking (Q4, FY18); undertake asset building activities each year 	 City of Winston-Salem HAWS 				

Discussion: In areas of racially and ethnically concentrated poverty, public investments will focus on increasing opportunities (as may be measured by HUD's poverty, school proficiency, labor market participation, transit usage, transportation cost, jobs proximity, and environmental health indices) in specific geographic areas. These place-based investments will recognize and build upon existing assets within the communities to be improved, including local interpretations of opportunity that may not be accounted for among HUD's specified indices. Place-based investments will simultaneously improve the built environment while advancing human capital development for the people residing in the community. Planning related to the Cleveland Avenue, Boston-Thurmond, and Bowen Park/Dreamland areas provide a starting point for place-based investments, and strategies called for in those areas will be advanced.

publicly supported housing 5. Support construction of housing by Habitat for Humanity outside of Winston-Salem – 6 units (Q4 FY20) 6. Explore siting public	2. Focus new construction of affordable housing in neighborhoods that offer greater access to opportunities	 Location and type of affordable housing Lack of public investment in specific neighborhoods Lack of private investment in specific neighborhoods Lack of community revitalization strategies Access to jobs Location of proficient schools and school assignment policies Availability of affordable units in a range of sizes Access to homeownership Impediments to mobility Siting selection policies, practices, and decisions for 	 Segregation R/ECAPs Disparities in Access to Opportunity Disproportionate Housing Needs Publicly Supported Housing 	 Continue construction of homes for home- ownership in Ridgewood Place subdivision – 5 units per year (beginning in FY18) Ujima CDC to complete Emmanuel Retirement Village (Q2, FY19) Support feasible applications for Low Income Housing Tax Credits, especially in areas of opportunity (ongoing) Support affordable workforce housing in downtown Winston-Salem (ongoing) 	 City of Winston-Salem Forsyth County HAWS
housing outside of		 Access to homeownership Impediments to mobility Siting selection policies, practices, and decisions for 		 4. Support affordable workforce housing in downtown Winston-Salem (ongoing) 5. Support construction of housing by Habitat for Humanity outside of Winston-Salem – 6 units (Q4 FY20) 6. Explore siting public 	

Discussion: To the degree new of affordable units), siting of such dwill be prioritized. Consideration	evelopments will consider the su	rrounding community's acce	ess to opportunities and locatior	is maximizing access
and resources that residents need	-	anded anordable nousing of	phons in communities of choice	that oner amendes
and resources that residents need 3. Improve mobility for low- and moderate-income residents	d to thrive.	 Segregation R/ECAPs Disparities in Access to Opportunity Publicly Supported Housing 	 Collect information on best practices in mobility programs from other jurisdictions (Q2, FY18) Design and implement a joint program, using HCVs and partner resources, to provide support to households considering moves to communities of greater opportunity (Q4, FY2018 and ongoing) Provide economic development incentives to businesses, with minimum wage requirements to help increase people's wages (ongoing) Undertake asset building activities (ongoing) Encourage development of project-based voucher developments (ongoing) Explore options for increasing transportation options for low- and moderate-income households, such as: Sidewalk, bikeway, and greenway install/ improvements 	 City of Winston-Salem Forsyth County HAWS

greater opportunities, such as better schools or increased employn	 Bus service needs and affordability, including routes, cost, and timing Explore program to help low-income persons purchase cars (e.g., Wheels for Hope) (ongoing) a variety of barriers in considering a move to a community that may offer nent options. These barriers may be financial (saving up security deposits and
	e's belongings), and psychological (not wanting to leave behind one's social and etically have a large degree of flexibility in where they choose to live, live in
	<i>i</i> in their neighborhood, others may wish to move to other areas in the city or
11 0	ition. The responsible program participants will develop a joint program to moves and will focus on other community development activities to help
increase residential mobility opportunities for low- and moderate-	income households, such as economic development incentives and improved
transportation options.	

4. Expand homeownership	• Location and type of	• R/ECAPs	1. Homebuyer assistance	• City of Winston-
opportunities	affordable housing	 Disproportionate 	programs:	Salem
opportunities	 Availability of affordable units in a range of sizes Access to homeownership 	• Disproportionate Housing Needs	 Programs: County to provide homebuyer assistance to 15 households per year City to provide home- buyer assistance to 5 households per year (beginning FY18) Individual development accounts: County to hold one class per year in FY18 and FY19 to close grant Require financial literacy and home-ownership 	Forsyth CountyHAWS
			training for homebuyer	

color, particularly African Ameri support programming that expan	Ilted throughout the process of de cans and Latinos, to homeowners nds homeownership opportunitie ers, financial literacy, and financir	ship. The three responsible p s for low- and moderate-inc	program participants will each co come households and people of c	ontinue to fund and
5. Protect existing housing stock	 Deteriorated and abandoned properties Lack of private investment in specific neighborhoods Reduced access to homeownership 	 Disproportionate Housing Needs R/ECAPs 	 Homeowner Rehabilitation Program: City to complete 35 cases per year County to complete 20 cases per year (beginning FY18) Code enforcement (ongoing) Support feasible applications for multifamily rental rehabilitation (ongoing) 	 City of Winston- Salem Forsyth County HAWS

Discussion: Helping homeowners improve and maintain existing single-family housing in R/ECAP census tracts will prevent property deterioration and serve as an incentive for additional private investment. Additionally, homeowner rehabilitation may help households address deferred maintenance, enabling low- and moderate-income households and households of color to remain in their homes as homeowners longer than they otherwise may have been able to. Homeownership rehabilitation programs and multifamily rental rehabilitation will both help reduce housing costs (or limit cost increases) for low- and moderate-income households, including African American and Latino households who face housing needs and severe cost burdens at disproportionately higher rates than white households.

	1	1		
6. Improve existing reasonable accommodation processes	 Land use and zoning laws State or local laws, policies, or practices that discourage individuals with disabilities from being placed in integrated settings Lack of affordable, accessible housing in a range of unit sizes Lack of affordable, integrated housing for individuals who need supportive services 	• Disability and Access	 Review the UDO with planning staff members and consult with community partners as needed to draft potential revisions (Q4, FY18); Amend ordinances and policies as necessary to expand housing choice for people with disabilities. (Q4, FY18) Support feasible applications for transitional or supportive housing, such as the Commons, Veterans Helping Veterans Heal (ongoing) 	 City of Winston- Salem Forsyth County HAWS
Discussion: The Unified Develop for people with disabilities to req will work through their planning around the form that requests sho must take, whether conditions ma	uest reasonable accommodations staffs and elected officials, with p ould take, the time frame within	s, however there remains ro public input, to add specificit which the reviewing authori	om to improve the provision. Th y to the UDO's reasonable accor	e City and County nmodation process

7. Support fair housing education and enforcement efforts	• Lack of resources for fair housing agencies and organizations	 Segregation Fair Housing Enforcement and 	1. Disseminate community- oriented fair housing education materials in	 City of Winston- Salem Forsyth County
		Outreach	English and Spanish through print, TV, and	• HAWS
			unougn print, TV, and	

electronic media
(ongoing)
2. Host and participate in 70
public forums/events on
community issues, e.g.,
religion, police/
community relations, and
youth issues (annually,
beginning FY18)
3. Increase involvement with
homeowners' associations
(ongoing)
4. Increase involvement with
immigrant communities,
such as through the BIC
(Building Integrated
Communities) Pipeline, a
one-stop shop to provide
local immigrant
populations with
information on fair and
affordable housing,
education, health care,
transportation, language
access, and related
resources in Winston-
Salem and Forsyth County
(ongoing)
5. Increase awareness
amongst landlords and
tenants of criminal
background check
guidance issued by HUD
(ongoing)
6. Conduct fair housing
testing (Q2, FY19)

Discussion: Fair housing education – both for the public and housing professionals (such as lenders, real estate agents, landlords, and property managers) – is an ongoing need. The City, County, and HAWS will all continue to support efforts to provide fair housing education throughout the community. Education targeted to non-English speakers and undocumented immigrants was described by stakeholders as a particular need and will specifically be supported.

8. Implement strategies to	Availability of affordable	Disproportionate	1. Complete and review	• City of Winston-
lecrease homelessness	units in a range of sizes	Housing Needs	recommendations of	Salem
	 Homelessness Lack of affordable, integrated housing for individuals who need supportive services 	• Disability and Access	 Continuum of Care (CoC) Strategic Plan (Q1, FY18) Coordinate with CoC on homeless delivery system (ongoing) Continue to support emergency shelter facilities and programs, rapid rehousing, and community intake, assisting about 1,600 persons per year (annually, beginning FY18) Encourage development of supportive housing (ongoing) Encourage development of income-based rental housing (ongoing) 	• Forsyth County

Discussion: Homelessness disproportionately impacts people of color, whose lack of access to housing can constitute a fair housing issue. Existing programs and strategies for transitioning homeless persons into permanent housing and otherwise reducing the number of homeless people in the community will continue to be implemented by Winston-Salem, Forsyth County, and HAWS through the Continuum of Care.

Note: Timeframes are based on a July 1 to June 30 fiscal year. For example, Q1, FY18 is July-September 2017; Q2, FY18 is October-December 2017; Q3, FY18 is January-March 2018; and Q4, FY18 is April-June 2018.