North Carolina Housing Finance Agency

Housing Assistance Fund Plan

June 15, 2021

Table of Contents

North Carolina's Housing Assistance Plan

North Carolina Housing Finance Agency (Agency) will be administering the Housing Assistance Fund (HAF) program on behalf of the eligible entity North Carolina Pandemic Response Office (NC PRO). The following plan is designed based on the April 14, 2021 guidance from the U.S. Department of the Treasury (Treasury).

Needs Assessment

Introduction

The COVID-19 pandemic has created economic hardships for homeowners across North Carolina. At the peak, over 350,000 homeowners were behind on payments.[1] As the state begins to show signs of recovery, 245,866 homeowners are behind on their payments or are already in foreclosure, placing them at heightened risk for losing their homes in the coming months.[2] An added sense of urgency exists for many North Carolina homeowners as the federal foreclosure moratorium comes to an end on June 30, 2021. Although it is difficult to estimate what is owed by delinquent homeowners, there is evidence of significant need. A survey of large credit unions in the state revealed that almost 900 loans are in active deferral, accounting for $142,455,015 in outstanding loan balances.[3] Among USDA loans in the state, nearly 6,000 loans are delinquent, 12% of all USDA loans.[4] Within the NC Housing Finance Agency's own portfolio, slightly more than 1,000 loans became delinquent during the pandemic owing approximately $8,140,000. While all of these homeowners may not qualify for assistance, the need for robust intervention exists across the state.

Many households experienced income shocks such as job loss, reduced hours or the death of a family member that impacted their ability to make housing payments. More than 1.5 million North Carolinians lost their jobs during the pandemic. The majority of job losses were in industries that pay low average wages—tourism, food services, and retail—for workers already facing financial precarity. Despite some recovery, employment remains low, especially in industries hardest hit by the pandemic. Between April 2020 and March 2021, unemployment decreased from 13.5% to 5.2% but remains above pre-pandemic levels.

Low-income households and households of color across the country have been especially hit hard by the pandemic with Black and Hispanic households more likely to lose their jobs and twice as likely to report being behind on their payments than white households. [5] These communities have been historically and systematically excluded from housing and economic opportunities, compromising their housing stability, financial security and wealth accumulation. During the 2008 recession, homeowners of color lost their homes at twice the rate of white homeowners and have experienced the slowest recovery from the housing market crisis. Without significant intervention, those same communities face the potential for major home ownership and wealth losses due to COVID-19.[6]

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[1] Census Bureau's Household Pulse Survey Week 14 (Sept 2 – Sept 14)
[2] Census Bureau's Household Pulse Survey Week 29 (April 28 – May 10)
[3] Comment letter from Carolina Credit Union League received by NCHFA
[4] NCHFA analysis of USDA data
[5] Consumer Finance Protection Bureau, "Housing Insecurity and the COVID-19 pandemic," March 2021, https://files.consumerfinance.gov/f/documents/cfpb_Housing_insecurity_and_the_COVID-19_pandemic.pdf
[6] Alanna McCargo and Jung Hyun Choi, "Closing the Gaps: Building Black Wealth through Homeownership," Urban Institute, November 2021, https://www.urban.org/sites/default/files/publication/103267/closing-the-gaps.pdf

To inform the distribution of resources and to target communities and populations in greatest need, the Agency examined demographics, economic conditions and risk factors for housing instability for the entire state at the county level. As shown in Table 1, risk factors included mortgage delinquencies, foreclosures, unemployment and the loss of utilities or home energy services. Limited by a scarcity of timely data, variables were chosen based on what the Agency had access to and what was understood to be key indicators of housing insecurity. Although imperfect, they provide a way to rank counties using these factors. The Agency tested several data points and scenarios and found consistency in the list of counties experiencing distress and social disadvantage.

Table 1. Measures for identifying the hardest-hit counties

Indicator	Measure	Sample Period	Data Source
Eligible homeowners	• Household earning less than 100% Area Median Income (AMI)	Annual	• CHAS 2013 - 2017
Socially disadvantaged individuals	• Share of nonwhite homeowners • Percentile rank for social vulnerability	Annual	• ACS 2015 – 2019 • CDC SVI 2018
Economic distress	• Difference in start to peak unemployment rate • Share of residents with any debt in collections • Loss of utilities	Monthly	• BLS • Urban Institute tabulations of credit bureau data • NC Utilities Commission
Housing distress	• Difference in start to peak 90+ day delinquency rate • Difference in start to peak forbearance rate • Non-forborne delinquency rate	Monthly	• Atlanta Fed calculations using Black Knight data • CoreLogic

Eligible Homeowners and Socially Disadvantaged Individuals

Nationally, homeowners earning less than $75,000 were twice as likely to be behind on mortgage payments than those earning more than $75,000. According to the latest CHAS data, North Carolina has over 1 million homeowners earning less than 100% AMI, approximately 40% of all homeowners.[7] In fifteen counties, the share of homeowners earning less than 100% AMI was 75% or greater suggesting a high concentration of eligible homeowners.

Socially disadvantaged individuals are those that have been subject to racial or ethnic prejudice or cultural bias because of their identity as a member of a group. To understand the geographic concentrations of socially disadvantaged individuals, the Agency used demographic data from the American Community Survey as well as the Center for Disease Control's (CDC) Social Vulnerability Index. Almost half of North Carolina’s non-white households are homeowners, whereas the majority (72%) of

[7] Consumer Finance Protection Bureau, “Housing Insecurity and the COVID-19 pandemic,” March 2021, https://files.consumerfinance.gov/f/documents/cfpb_Housing_insecurity_and_the_COVID-19_pandemic.pdf

white households are homeowners. North Carolina has 529,145 non-white homeowners, 20% of all homeowners. Of the 100 counties in the state, 42 have a share of non-white homeowners higher than the state average. In seven counties, half of all homeowners are non-white. These include Robeson, Hertford, Bertie, Northampton, Halifax, Warren and Hoke.

Table 2. Homeowners by Race/Ethnicity

Race/Ethnicity	Owner-Occupied Households	Homeownership Rate	Share of Homeowners
Total	2,585,935	65%	
White	2,056,789	72%	80%
Black or African American	380,625	46%	15%
American Indian and Alaska Native	27,287	64%	1%
Asian	56,464	62%	2%
Native Hawaiian and Other Pacific Islander	1,193	51%	0.05%
Some other race	34,409	42%	1%
Two or more races	29,167	50%	1%
Hispanic or Latino origin	114,117	46%	4%
White alone, not Hispanic or Latino	1,983,843	73%	77%

Source: ACS 2015 - 2019

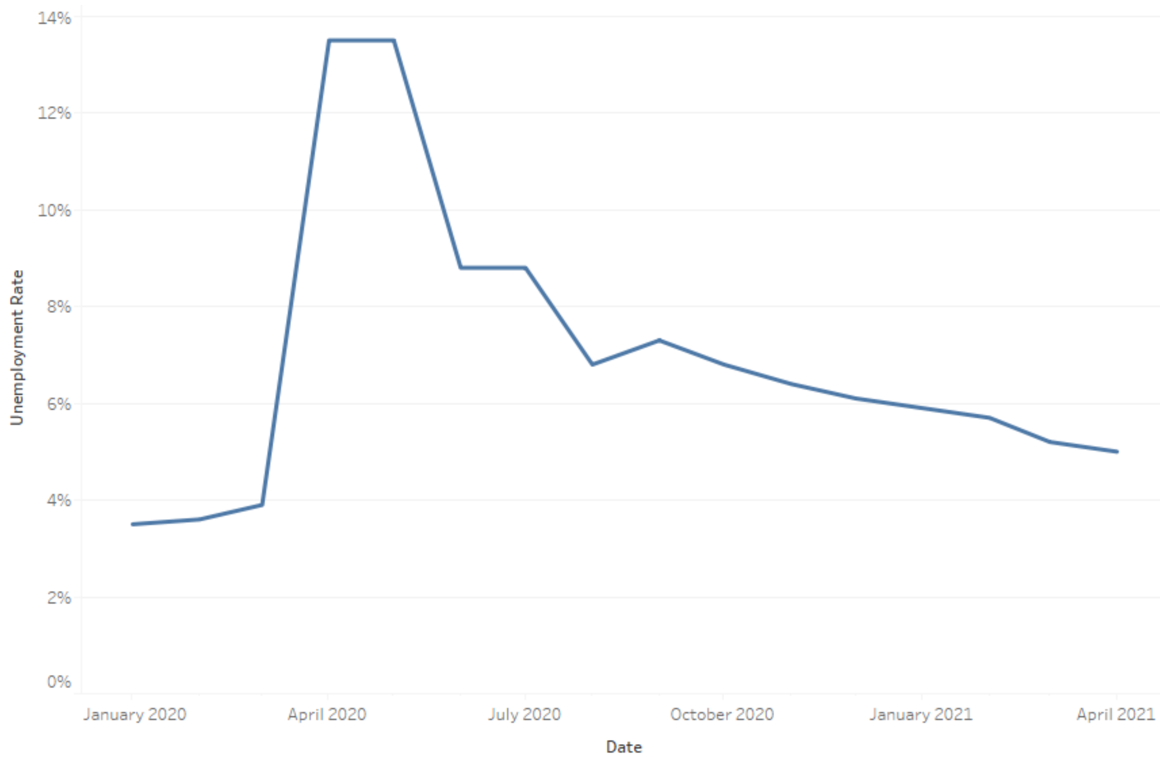
The CDC's Social Vulnerability Index ranks counties and census tracts on 15 social factors including unemployment, minority status and disability and others that impact a community's ability to prevent human suffering or financial loss in the event of a disaster. The ten counties in North Carolina with the highest levels of social vulnerability were Greene, Robeson, Lenoir, Scotland, Hertford, Duplin, Sampson, Vance, Richmond and Edgecombe. At the census tract level, North Carolina has 217 tracts across 56 counties at the top 10% of social vulnerability. Nearly half of the most socially vulnerable tracts were located in just nine counties: Mecklenburg, Guilford, Robeson, Forsyth, Durham, Cumberland, Wayne, Davidson and Wake.

Economic Distress

As the impacts of the pandemic became more widely felt and restrictions were put in place, employment fell sharply, especially in vulnerable sectors like leisure and accommodation. Over 1.5 million North Carolinians filed for unemployment between March 2020 and June 2021.[8] Additionally, as job losses were heavily concentrated in industries that employ many low-wage workers, the most vulnerable households were more likely to experience prolonged periods of unemployment and financial distress.

[8] Unemployment Benefits Data, Division of Employment Security (updated June 15, 2021) https://des.nc.gov/need-help/unemployment-benefits-data

Figure 1. Monthly unemployment rate (Jan 2020 – Apr 2021)



Source: BLS

Although North Carolina shows signs of recovery, many communities still have fewer jobs and more people looking for work than before the pandemic. North Carolina needs close to 160,000 jobs to reach pre-COVID employment levels.[9] The unemployment rate has remained higher than before the pandemic in every county except Hyde, and in 51 counties was still at least 2% higher than in February 2020. In February 2021, 46 counties had a higher unemployment rate than the state's overall rate of 5.7%. Counties with recreation and tourism economies were especially hard hit with some counties experiencing more than 20% unemployment in April 2020. Dare, Alexander, Swain, Buncombe and Catawba counties saw 15 percentage points difference between the start of the pandemic and peak unemployment.

The pandemic disrupted finances for many households, compromising their credit health and affecting their ability to weather an economic shock. An analysis by the Urban Institute shows that in October 2020, more than a third of North Carolinians had debt in collections.[10] Communities of color in North Carolina had higher shares of residents with debt in collection than majority-white communities, reflecting the impacts of systemic racism. Fifty counties had a higher share of residents in collections than the state overall, with Bertie having the highest share at 57%. Counties with poor credit health were concentrated in the eastern parts of the state. Debt in collections negatively impacts a person's ability to borrow and compromises their ability to build wealth over time.

[9] Michael Ettinger and Jordan Hensley, "COVID-19 Economic Crisis by State" UNH Carsey School of Public Policy, https://carsey.unh.edu/COVID-19-Economic-Impact-By-State

[10] Urban Institute, "Credit Health During the COVID-19 Pandemic", Feb 25, 2021 https://apps.urban.org/features/credit-health-during-pandemic/

Table 3. Share of Households with Debt in Collections (Oct 2020)

Geography	Share of debt in collections (Oct 2020)
North Carolina	34.3%
Communities of color	46.1%
Majority-white communities	29.6%

Source: Urban Institute tabulations of credit bureau data

Many residents have struggled to keep up with household expenses, including utility bills. Data on past due accounts and disconnections were made available through the NC Utilities Commission which implemented a mandatory reporting requirement for certain utility providers, excluding Class C wastewater and water public utilities. At the end of January, 42 utilities reported 600,000 residential accounts in North Carolina were behind on their payments, amounting to $134.6 million in arrearages. This is likely an underestimate of delinquency and disconnection as it excludes many municipal water utilities.

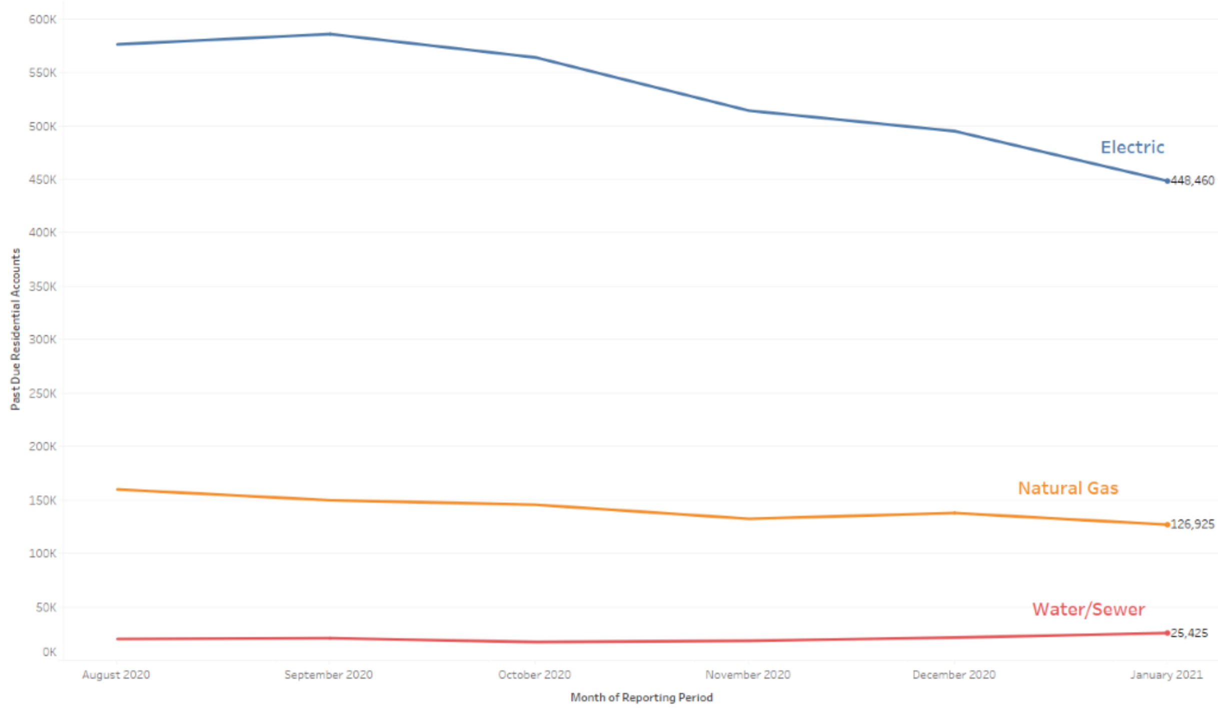
Table 4. Summary of Past Due, Repayment and Disconnected Accounts by Utility Type (Jan 2021)

Utility Service Type	Residential Accounts	Past Due Residential Accounts	Balance Past Due	Repayment Plan Accounts	Disconnected Accounts
Electric	3,190,342	448,460	$115,316,980	161,466	16,623
Natural Gas	1,266,174	126,925	$17,239,036	22,331	1,590
Water/Sewer	180,309	25,425	$2,086,154	2,296	777

Source: NC Utilities Commission

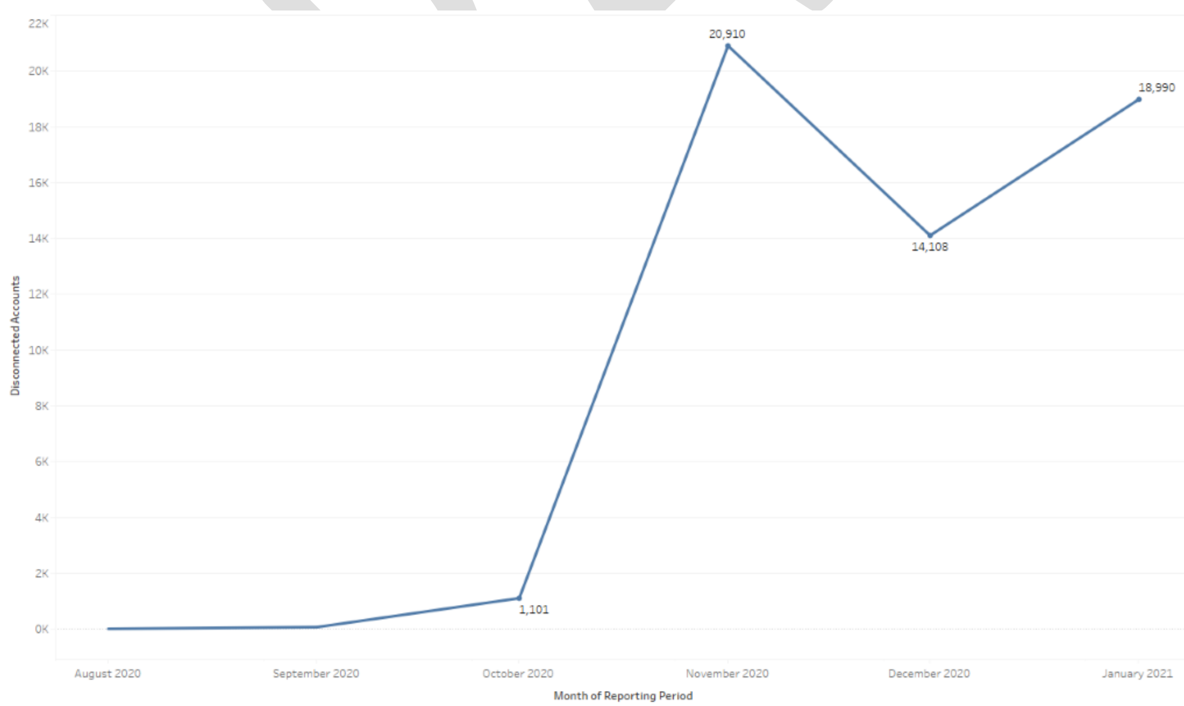
Although fewer accounts are behind on payments than earlier in the summer of 2020, disconnections have increased significantly since the end of the statewide moratorium on utility shutoffs. Disconnections were almost non-existent in August 2020 and September 2020 with a slight increase in October and steep increase in November 2020. Disconnections peaked in November with over 20,000 disconnected accounts and remained high in January 2021.

Figure 2. Past Due Residential Account by Utility Type



Source: NCHFA analysis of NC Utilities Commission data

Figure 3. Disconnections Across All Reporting Utilities



Source: NCHFA analysis of NC Utilities Commission data

Housing distress

Housing Distress Methodology

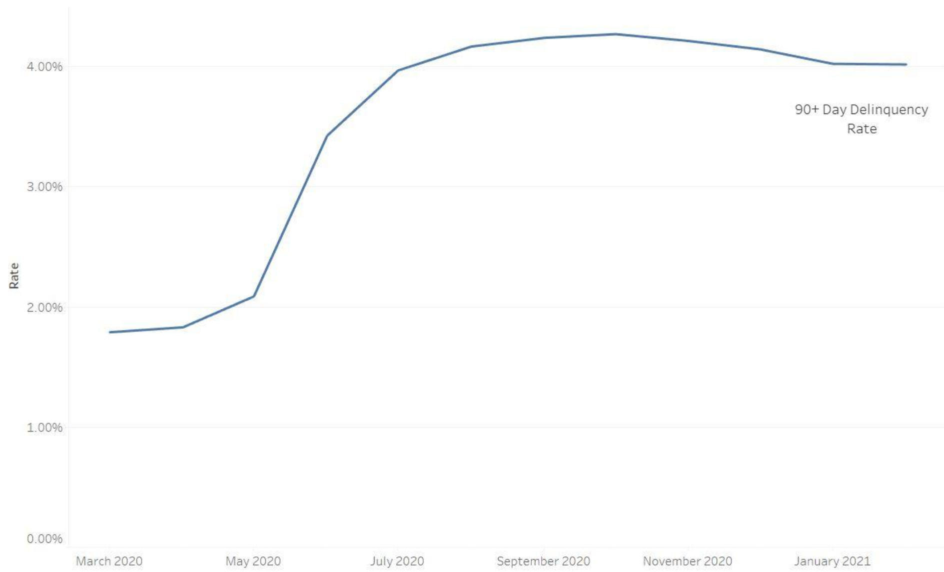
The metrics used to measure housing distress in North Carolina came from two sources: CoreLogic Market Trends Report and Federal Home Loan Bank of Atlanta calculations using Black Knight's McDash Flash daily mortgage performance data. The CoreLogic data provided the count and rate of loans 90 or more days delinquent, regardless of forbearance status. The Atlanta Fed calculations of Black Knight data included loans in forbearance and non-forborne delinquent loans. Both data sources are proprietary, so exact counts and rates cannot be released. To complete the needs assessment, the Agency analyzed the housing distress metrics and provided the corresponding county rankings and ranges as a method of representing the housing distress in North Carolina. The Atlanta Fed calculations of Black Knight data did not contain any county level data for seven counties (Hyde, Less, Lenoir, Martin, Pasquotank, Tyrrell, and Warren). To compensate for the lack of data, the Agency assigned a fixed rate to each of the seven counties based on the average across the state for each individual metric.

Two measures of delinquency and forbearance patterns were used for this assessment. Delinquency is measured first as it is traditionally, with the 90+ day delinquency rate which captures delinquent loans regardless of forbearance status. Second, the non-forborne delinquency rate is used. This second rate is important to assess borrowers who have not received relief during the pandemic either because they could not obtain forbearance or did not seek it out. The forbearance rates show loans that were in forbearance status, including both current and delinquent loans.

Housing Distress Analysis

Homeowners in distress have been forced to make difficult tradeoffs between utility bills, mortgage payments and other expenses. The number of North Carolina homeowners three or more months behind on their mortgage has decreased since the worst months of the pandemic, but only by 0.25% since the peak in October 2020. As the economic ramifications of the pandemic took hold, delinquency rates shot up across the state, nearly doubling between March 2020 and July 2020. In reality, homeowners fell behind on their mortgages faster than this would suggest, as these rates are based on those who are more than three months behind on mortgage payments, so the lag must be considered. However, a significant number of these delinquent loans were able to obtain forbearance plans due to the COVID-19 related forbearance provisions, removing the immediate risk of foreclosure.

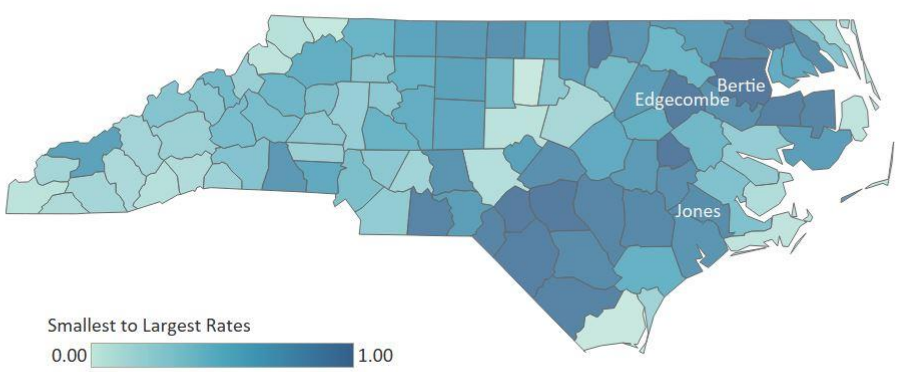
Figure 4: 90+ Day Delinquency Rates and Pre-Foreclosure Filing Rates Over Time



Source: CoreLogic Market Trends

Households across the state experienced difficulties paying their mortgage at different rates. In March 2020, Jones, Edgecombe and Bertie counties experienced the highest level of delinquency rates. At the pandemic's peak economic stress, Jones, Edgecombe and Bertie remained in the top 10 most distressed counties with Bertie's delinquency rate reaching nearly 3 percentage points more than the state average rate. As of February 2021, Bertie County had the greatest percent of homeowners three or more months behind on their rent, as shown in Figure 5 below.

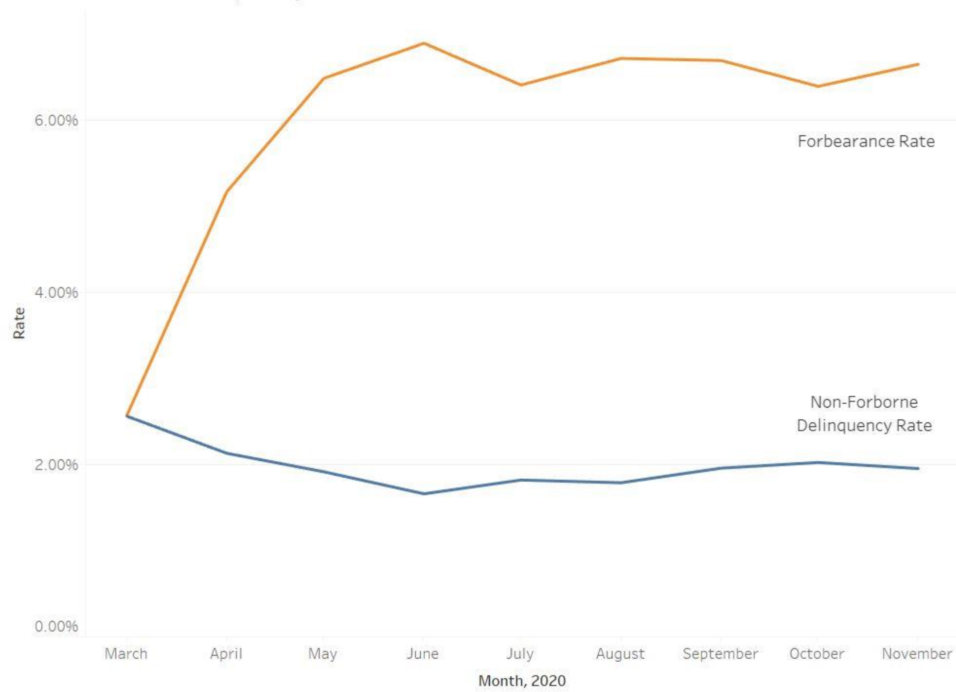
Figure 5: Percentile Rank of 90+ Day Delinquency Rates (As of February 2021)



Source: CoreLogic Market Trends

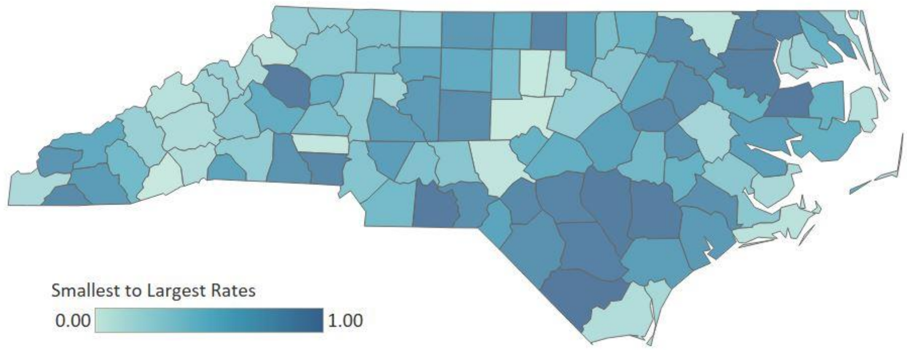
Under the Federal Housing Finance Agency (FHFA) decision, homeowners with Government-Sponsored Enterprise (GSE) and federally-backed mortgages could obtain forbearance for up to 360 days. Many servicers and investors offered similar protections for privately owned mortgages. Borrowers utilized the forbearance relief tool to stave off foreclosures. Many sought forbearances not to use immediately but to have available in case they later had trouble paying mortgages; others utilized forbearance to ensure their missed payments did not place them in jeopardy of losing their homes. By April 2020, North Carolina's forbearance rate had doubled from the previous month. Beginning in May through at least November 2020 (the last month for which we have these data), the rate stayed roughly triple that of the pre-pandemic March, 2020 rate.

Figure 6: Forbearance & Non-Forborne Delinquency Rates Over Time



Source: Atlanta Fed calculations using Black Knight's McDash Flash daily mortgage performance data (available with a two-day lag), U.S. Census Bureau 2017 FIPS Codes

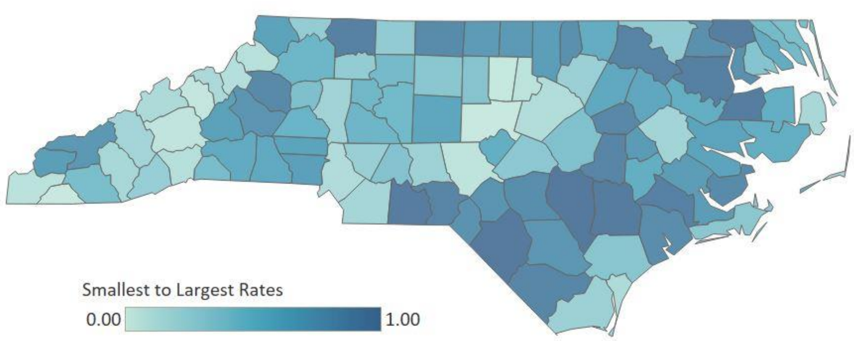
Figure 7: Percentile Rank of Forbearance Rate (As of November 2020)



Source: Atlanta Fed calculations using Black Knight's McDash Flash daily mortgage performance data (available with a two-day lag), U.S. Census Bureau 2017 FIPS Codes

For the most part, the number and rate of non-forborne delinquencies did not change in response to the pandemic. Because forbearance was offered so broadly, those without forbearance who struggled to maintain mortgage payments could be seen to be either with servicers not offering relief or the homeowner was not aware of the benefits or eligibility of forbearance relief. In many ways, areas of high non-forborne delinquency show a need for assistance and homeowners who are at higher risk of losing their homes.

Figure 8: Percentile Rank of Delinquency – Exclusive of Forborne Loans (As of November 2020)



Source: Atlanta Fed calculations using Black Knight's McDash Flash daily mortgage performance data (available with a two-day lag), U.S. Census Bureau 2017 FIPS Codes

As many homeowners were able to access forbearance plans, the foreclosure rates across the country and in North Carolina decreased. The pre-foreclosure filings—mortgages where the lender has started the foreclosure proceedings and made it known through public notice—dropped by 80% from January 2020 to April 2020. As of February 2021, the pre-foreclosure filings had doubled since the start of the pandemic, yet remained significantly below pre-pandemic levels. While the decreased filings may indicate housing stability, many potential foreclosures are being postponed due to current forbearance plans. Additionally, economically disadvantaged counties are at greater risk of foreclosures with higher percentages of pre-foreclosure filings. Over the course of the pandemic, homeowners in several counties continued to experience higher than average foreclosure rates. Bertie, Montgomery and Edgecombe counties experienced pre-foreclosure rates anywhere from two to four times higher than the state average.

An analysis of the Agency's loan portfolio which contains approximately 21,000 loans shows 1,024 loans in forbearance as of May 2021 with FHA loans most heavily impacted. The majority of loans in forbearance are more than three months behind, indicating significant economic hardship. Thirty counties had 5% or more loans in forbearance with eleven counties experiencing a rate of forbearance higher than 10% including Alleghany, Columbus, Pamlico, Dare, Montgomery, Currituck, Wilkes, Camden, Rutherford, Sampson and Richmond. In 2020, the Agency saw a significant spike in delinquencies from 62 loans missing a payment in 2019 to 674 loans missing a payment in 2020, and 379 loans missing a payment as of April 2021. Arrearages for accounts who first missed a payment in either year are approximately $8,140,000.

Analysis of USDA and FHA loans in North Carolina reflects similar trends in delinquency. Among USDA loans, 12% are delinquent with delinquency rates by county ranging from no delinquency in several counties to 28% in Pamlico County. Of the 5,995 USDA loans, a third are in the 41 counties prioritized for outreach (see Figure 13). The latest HUD Neighborhood Watch report shows a delinquency rate of 13.8% among FHA loans in North Carolina. Of the 31,062 delinquent loans, 22,383 or 9.9% of all loans are over three months delinquent indicating severe distress. While these loan portfolios do not represent the entirety of the market, they demonstrate significant need across the state, especially among low- to middle-income households.

Methodology for Identifying Geographic Areas of Distress and Social Disadvantage

The Agency created a priority index for identifying communities of social disadvantage with high levels of housing and economic distress caused by the pandemic. The index estimated the level of need in a county by measuring the prevalence of socially disadvantaged homeowners at risk of housing instability due to delinquency. The index aims to incorporate as close to real-time information as available on the impacts of COVID-19 on job loss and mortgage payments. To satisfy the statutory requirements and promote a racially equitable recovery, the index more heavily weights indicators of social disadvantage which include percentile rank of social vulnerability and non-white share of homeowners.

Table 5. Indicator weights

Indicator	Weight within subindex	Weight
Housing Distress		**0.3**
90+ day delinquency rate (2/21)	0.2	0.06
Difference in start to peak 90+ delinquency rate	0.2	0.06
Forbearance rate (11/20)	0.2	0.06
Difference in start to peak forbearance rate	0.2	0.06
Non-forborne delinquency rate (11/20)	0.2	0.06
Economic Distress		**0.3**
Unemployment rate (2/21)	0.33	0.1
Difference in start to peak unemployment rate	0.33	0.1
Share of debt in collections (10/20)	0.33	0.1
Social Disadvantage		**0.4**
Percentile rank of social vulnerability	0.5	0.2
Non-white share of homeowners	0.5	0.2

For each county in North Carolina, the Agency generated its percentile rank among all counties for 1) the 10 individual measures, 2) the three sub-indices and 3) its overall position. For the sub-indices, we summed the percentiles for the measures comprising each sub index. For overall county rankings, we summed the sums for each sub index using weights, ordered the counties and then calculated percentile rankings. Percentile rankings range from 0 to 1, with higher values indicating greater social disadvantage, housing insecurity and economic distress.

Figure 9. Map of Counties by Percentile Rank of Housing Distress

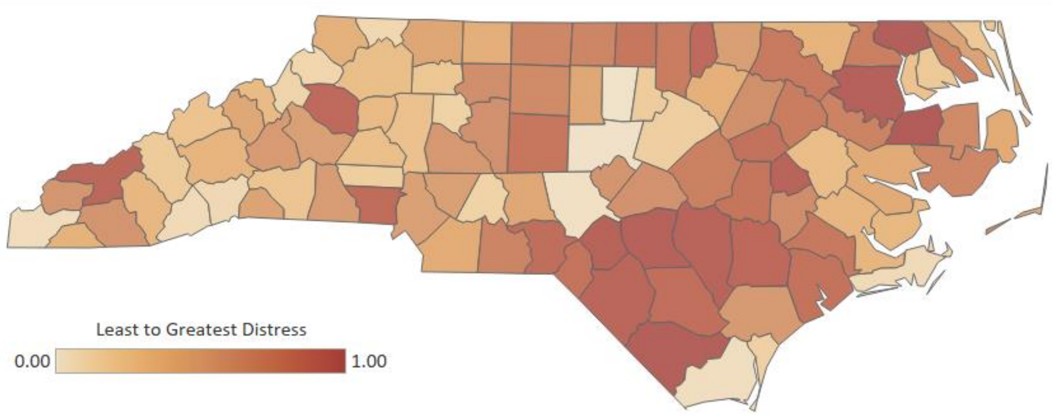


Figure 10. Map of Counties by Percentile Rank of Economic Distress

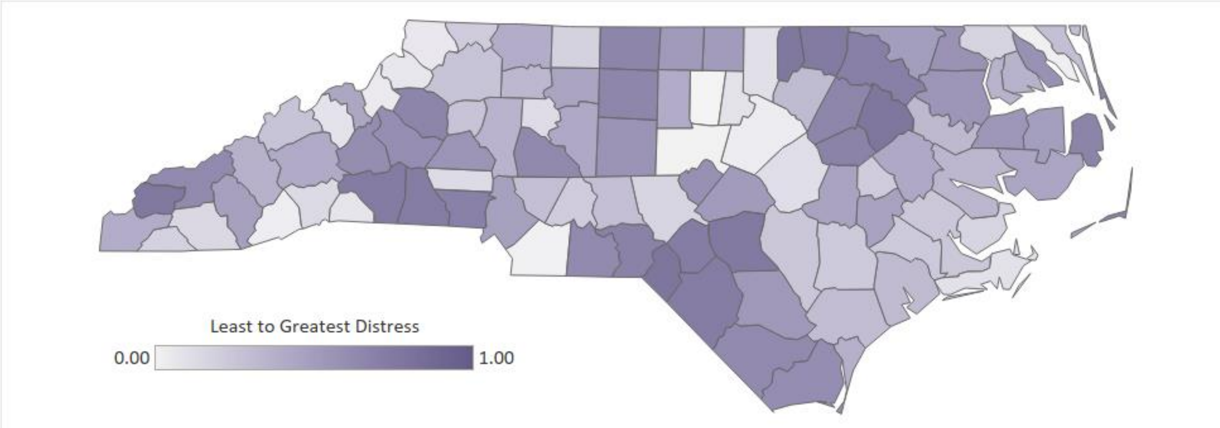


Figure 11. Map of Counties by Percentile Rank of Social Disadvantage

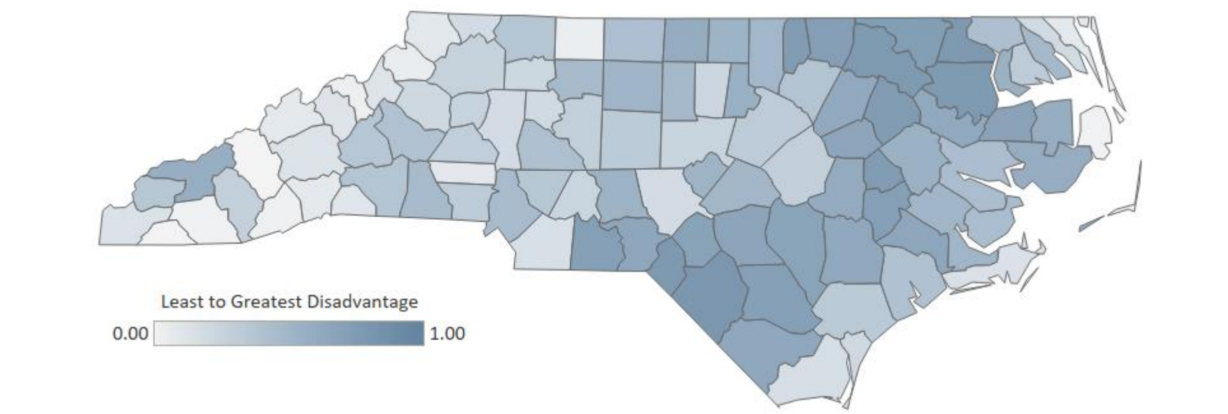
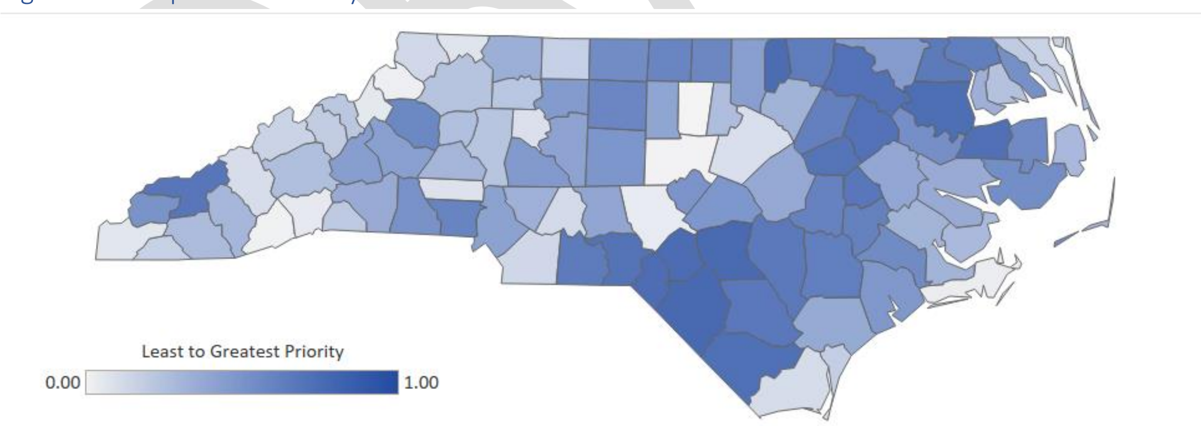


Figure 12. Map of Counties by Overall Percentile Rank



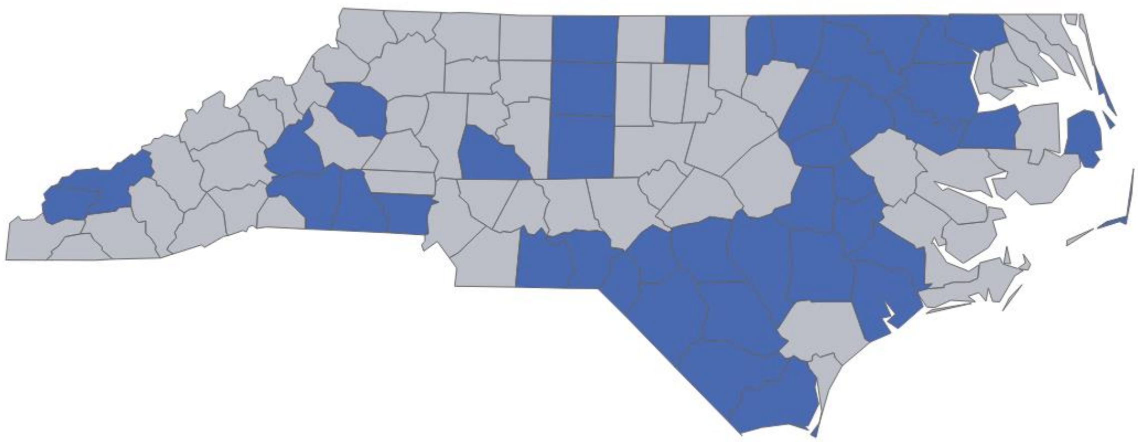
To identify counties that will be prioritized for outreach, the Agency defined target geographic areas as any county that is in the 75th percentile or higher in overall rank or in any of the three sub-indices. There was significant overlap in the counties represented in the top 25 of the sub-indices and in the overall ranking. As a result of this methodology, a total of 41 counties will by prioritized for outreach, 25 counties from the overall ranking, plus three from the top quartile of social disadvantage, four from the top quartile of housing distress and nine from the top quartile of economic distress, which were not captured in the overall ranking.

Table 6. Highest Ranking Counties by Subindex and Overall Rank

Rank	Social Disadvantage	Housing Distress	Economic Distress	Overall Ranking
1	Robeson	Washington	Scotland	Robeson
2	Hertford	Gates	Edgecombe	Cumberland
3	Scotland	Columbus	Vance	Hoke
4	Bertie	Bertie	Graham	Vance
5	Halifax	Cumberland	Cumberland	Scotland
6	Vance	Hoke	Warren	Bertie
7	Edgecombe	Sampson	Rutherford	Washington
8	Greene	Greene	Hoke	Columbus
9	Northampton	Robeson	Robeson	Edgecombe
10	Warren	Swain	Cleveland	Halifax
11	Lenoir	Duplin	Halifax	Richmond
12	Bladen	Vance	Gaston	Wilson
13	Anson	Caldwell	Richmond	Swain
14	Hoke	Gaston	Wilson	Greene
15	Washington	Richmond	Dare	Bladen
16	Sampson	Bladen	Caldwell	Sampson
17	Cumberland	Wilson	Rockingham	Hertford
18	Wilson	Onslow	Guilford	Anson
19	Richmond	Scotland	Nash	Warren
20	Jones	Wayne	Rowan	Gates
21	Columbus	Person	Anson	Duplin
22	Duplin	Randolph	Columbus	Nash
23	Nash	Jones	Swain	Lenoir
24	Martin	Halifax	McDowell	Wayne
25	Wayne	Edgecombe	Brunswick	Gaston

Note: Counties in yellow will be targeted for enhanced outreach

Figure 13. Map of Target Counties



Recognizing that county-level analysis obscures distress and disadvantage within a county, the Agency also undertook a census tract level analysis of urban counties (i.e. principal counties in a metropolitan statistical area). Due to the unavailability of data at the census tract level for some of the indicators used in the index, the Agency used several federal designations of distress and social disadvantage as proxies including Qualified Census Tracts, Racial and/or Ethnic Concentrated Areas of Poverty, distressed or underserved areas under Community Reinvestment Act, and Duty to Serve Areas. A total of 204 tracts in 19 counties had one or more federal designations and will be prioritized for targeted outreach.

Table 7. Urban Counties with Federally Designated Census Tracts

Counties	Number of Designated Tracts
Mecklenburg	60
Forsyth	30
Wake	23
Durham	18
New Hanover	12
Johnston	10
Pitt	7
Buncombe	6
Alamance	6
Orange	5
Catawba	4
Davidson	4
Brunswick	4
Iredell	4
Union	3
Burke	3
Craven	2
Caldwell	2
Chatham	1
Grand Total	**204**

Conclusion

There is demonstrable need for assistance across the state, especially to reduce mortgage delinquency among income-eligible and socially disadvantaged homeowners. The economic impacts of COVID-19 are still felt in communities across the state, especially those reliant on hard-hit industries like recreation and tourism. Black and Latino households were disproportionately affected by COVID-19 infection rates and job loss, compromising their ability to pay their mortgage and retain wealth. The Agency has identified 41 counties and 204 Census tracts with high levels of social disadvantage, economic and housing distress that will be targeted for enhanced outreach.

Program Design

North Carolina's Homeowner Assistance Fund (HAF) program will mitigate financial hardships associated with the COVID-19 pandemic by providing funds to eligible homeowners to prevent homeowner delinquencies, defaults, foreclosures and homeowner displacement. The primary goal of the program is for homeowner retention and reduced delinquencies among homeowners receiving assistance. Among other criteria described below, an eligible homeowner is one experiencing financial hardship after January 21, 2020 associated with the COVID-19 pandemic.

Based on the Needs Assessment presented earlier in this plan, North Carolina has seen a significant number of homeowners fall behind in housing payments. While data used shows mortgage-related needs, less visible through traditional data sources is the need for associated housing costs like insurance and taxes outside of escrow, and HOA and condo association fees that can jeopardize homeownership if left unpaid. The program intends to allow for a broad menu of eligible uses so that the Agency is well positioned to address the need both quantified by our data resources and the associated housing costs for which we have limited current data but that programmatically could place a homeowner in jeopardy of losing their home.

Use of Funds

The Agency plans to use HAF funding for the following types of qualified expenses that are for the purpose of preventing homeowner delinquencies, defaults, foreclosures and/or displacement:

1. Mortgage payment assistance;
2. Financial assistance to allow a homeowner to reinstate a mortgage or to pay other housing-related costs due to a period of forbearance, delinquency, or default. This would include a first and second mortgage, if needed, to bring the homeowner current;
3. Payment assistance for housing related costs. Examples include: homeowner's insurance, flood insurance, and mortgage insurance; homeowner's association fees or liens, condominium association fees, or common charges; and payment assistance for delinquent property taxes to prevent homeowner tax foreclosures

Eligible Homeowners

Homeowners are eligible to receive assistance under the HAF program if:

1. They experienced a financial hardship after January 21, 2020 and have incomes equal to or less than 150% of the area median income, consistent with Treasury guidance.
2. The qualified expenses are related to the dwelling that is the homeowner's primary residence.
3. They attest that they experienced financial hardship after January 21, 2020. The attestation must describe the nature of the financial hardship (for example, job loss, reduction in income, or increased costs due to healthcare or the need to care for a family member).

Income Determinations

For the purposes of determining income eligibility, NCHFA will use HUD's definition of "annual income" in 24 CFR 5.609 or use adjusted gross income as defined for purposes of reporting on Internal Revenue Service (IRS) Form 1040 series for individual federal annual income tax purposes.

Income Verification Requirements

To confirm income for eligibility and targeting, the homeowner must provide the following:

1. A written attestation as to household income, and
2. Documentation of income such as paystubs, W-2s or other wage statements, IRS Form 1099s, tax filings, depository institution statements demonstrating regular income, an attestation from an employer, or proof of receipt of a federal means-tested program which requires income to be at or below that required income for an eligible homeowner under HAF (such as Supplemental Nutritional Assistance Program/SNAP or Medicaid).
    a. If the homeowner is not able to produce the needed documentation, there is one alternate, fact-specific proxy that can be used for verifying income.
3. If the homeowner lives in a census tract with one or more of the following federal distress and/or low-income designations, the homeowner is presumed to meet the income eligibility requirements:
    a. FHFA Duty to Serve designations of Areas of Concentrated Poverty
    b. HUD designations of Racial and/or Ethnic Areas of Concentrated Poverty
    c. FFIEC designations of distressed, underserved, poverty, remote rural and/or unemployment)
    d. HUD designations of Qualified Census Tracts for use in the Low-Income Housing Tax Credit program

The Agency may also provide waivers or exceptions to these documentation requirements, as reasonably necessary, to accommodate extenuating circumstances, such as disabilities, practical challenges related to the pandemic or a lack of technological access by homeowners when alternative documentation or income verification is available.

Homeowner Assistance Offered

Eligible homeowners may be able to access the following assistance, up to a maximum of $35,000:

1. Mortgage payment assistance
2. Financial assistance to allow a homeowner to reinstate a mortgage or to pay other housing-related costs related to a period of forbearance, delinquency, or default. This would include a first and second mortgage
3. Payment assistance for housing related costs. Examples include: homeowner's insurance, flood insurance, and mortgage insurance; homeowner's association fees or liens, condominium association fees, or common charges; and payment assistance for delinquent property taxes to prevent homeowner tax foreclosures

Targeted Homeowners

The Agency will prioritize funding to the following populations:

1. Not less than 60% will be used for qualified expenses that assist homeowners having incomes equal to or less than 100% of the area median income or equal to or less than 100% of the median income for the United States, whichever is greater.
2. Any amount not made available to homeowners that meet the above income-targeting requirement will be prioritized for assistance to socially disadvantaged individuals. "Socially

disadvantaged individuals" are those who have been subjected to racial or ethnic prejudice or cultural bias because of their identity as a member of a group without regard to their individual qualities. There is a rebuttable presumption that the following individuals are socially disadvantaged if they self-identify as such: Black Americans, Hispanic Americans, Native Americans, and Asian Americans and Pacific Islanders.

3. The Agency will prioritize assistance to homeowners who have Federal Housing Administration (FHA), Department of Veterans Affairs (VA), or U.S. Department of Agriculture (USDA) mortgages and homeowners who have mortgages made with the proceeds of mortgage revenue bonds or other mortgage programs that target low- and moderate-income borrowers (such as Habitat for Humanity borrowers or those with an Agency NC Home Advantage loan).

Application Process

The Agency has been successful in the past with a direct online portal that is supplemented with telephone support. In some cases, the application process may be supported in local communities directly.

Payment Process

Payments will be processed through the HAF system with disbursements made directly to the third party and not to the eligible homeowner. The Agency will use the Common Data File (CDF) for validating loan information and communicating payments to servicers that use the CDF, which is similar in concept with the Hardest Hit Fund (HHF) program.

Other Available Sources of Assistance for Targeted Homeowners

The Agency has initially prioritized mortgage and mortgage-related assistance. While there is a need for assistance with utility and internet costs, the presence of other relief funds within North Carolina designed for these needs informed our decision to start with assistance more closely tied to the cost of mortgages, taxes, insurance and fees. Qualified assistance uses that are not included in the initial program may be offered at a later date.

The Agency funds the State Home Foreclosure Prevention Project (SHFPP) that provides extensive foreclosure prevention counseling. The counseling assists in finding solutions for homeowners struggling to make payments. NC211 is statewide resource referral that can connect homeowners to additional types of assistance they may require that is offer that the local, state or national level.

Methods for Targeting and Outreach for HAF Funding

There is significant need for homeowner assistance across the state, especially for reducing mortgage delinquency among the targeted populations. The economic impacts of COVID-19 are still felt in communities across the state, especially those reliant on hard-hit industries like recreation and tourism. Black and Latino households were disproportionately affected by COVID-19 infection rates and job loss, compromising their ability to pay their mortgage and retain wealth. The 41 counties and 204 census tracts identified in the Needs Assessment will be targeted for enhanced outreach based on their high levels of social disadvantage, economic and housing distress. Using the findings from the Needs Assessment included above, the Agency will determine the best outreach strategies to reach the target markets.

The following strategies and tactics will be deployed both statewide and in targeted markets:

1. Develop brand and build online presence for program information and how to apply.
2. Develop statewide digital marketing campaign driving traffic to microsite and/or call center.
3. Leverage media, state and local partnerships to promote program awareness to target audiences.
4. Use alternate media, trade and nonprofit organizations, niche publications and direct mail and email marketing to reach rural areas, hard-hit industries and socially disadvantaged groups.

Special consideration in reaching target markets

Digital marketing for the HAF program will need to be supplemented with other forms of outreach for residents of more rural areas who may not have reliable or any Internet access. Recent analysis reveals that only 74% of North Carolinians have Internet access. More than 40% of residents in the following counties lack access: Bertie, Graham, Halifax, Hyde, Jones, Northampton, Robeson and Warren. With the exception of Hyde, all of those counties were also among the 41 highest ranking counties across the Distress Indices discussed above. Thirty percent of residents in another 20 counties have no Internet access.

For past efforts in reaching homeowners in need, digital advertising was the most successful paid advertising in terms of statewide outreach, cost and return on investment. TV and radio advertising had a much higher cost per applicant. However, based on some of the rural target counties, we will explore both paid and PSA placements on rural radio stations and in local publications to reach socially disadvantaged individuals who may be among those lacking internet access. We will pay particular attention to stations and publications that target specific racial and ethnic groups.
Non-traditional outreach may prove to be more effective in reaching some of the targeted populations, particularly methods based on guidance from local partners on what will work best in their communities. The Agency is compiling a growing list of organizations and stakeholders who serve the geographic areas or the demographic groups identified for enhanced outreach. We plan to add to this list as we identify successful avenues of outreach.

With previous campaigns, printed materials were critical and used both at in-person events; onsite at libraries, local government and social service offices; and in strategic mailings. Given that offices may continue limiting visitors and in-person events are not immediately feasible, the focus for printed materials will be developing materials to include in our own and partner mailings. Materials will be provided in both English and Spanish to ensure wider reach to socially disadvantaged individuals.

Performance Goals

Goal	Activities and Measures	Sample outcomes
Targeting vulnerable groups	• # of inquiries received by phone, email, etc. • # and % applications completed • # of outreach events in priority counties and Census tracts • # of mailers, ads, in priority counties and Census tracts	>50% of inquiries from counties or Census tracts prioritized for enhanced outreach >50% of applications completed by socially disadvantaged individuals
Reducing mortgage delinquency among program participants	• # and % of households able to receive a mortgage remedy within 6 months • # and % of households current (or within 30 days) on the mortgage one year after the assistance	Share of households served by the program is proportional to or exceeds nonwhite share of homeowners 75% of accepted applicants able to receive a mortgage remedy within six months 75% of accepted applicants current on mortgage one year after receipt of assistance

Other performance measures may be added after vendor selection is finalized. Examples of additional measures include prevention of foreclosure among program participants and the efficiency of our application and review process.

Best Practices & Coordination with other HAF Participants:

The Agency is well positioned to quickly and efficiently launch the HAF program. The Agency is experienced in designing and implementing programs quickly and effectively, targeting those most in need based on household circumstances and geography. The Agency is particularly well suited with designing programs to be responsive to the need at hand. This has occurred with respect to housing solutions provided after natural disasters like recent Hurricanes and economic disasters like the Great Recession. Best practices for program administration have been gleaned from previous Agency program experiences as well as other Housing Finance Agencies (HFAs) across the nation.

The most recent precedent is through the Hardest Hit Fund (HHF), the program was administered by the U.S. Department of the Treasury and delivered assistance through HFAs in states with high rates of unemployment. North Carolina was designated a Hardest Hit state in 2010. The Agency and NCHFA operated an HHF funded programs under the North Carolina Foreclosure Prevention Fund from 2010 until it closed in July of 2019. There are multiple similarities in HAF to the delivery systems employed by the HHF.

On the state level, the Home Protection Program, initially designed to help with large employer closure, expanded to assist all homeowners that had lost their job through no fault of their own and provided bridge loans to cover mortgages until the homeowner could retrain or find alternate employment. A robust feature of the Home Protection Program allowed the Agency to place a stay of foreclosure while the application was being processed. The Home Protection Program statute, still in place, was the underpinning for the state's HHF program.

Also housed at the Agency is the State Home Foreclosure Prevention Program (SHFPP). SHFPP is funded by a one-time foreclosure filing fee assessed to mortgage servicers. SHFPP does not offer direct financial assistance to homeowners but pays for housing counseling sessions for homeowners at the risk of foreclosure and some legal costs. SHFPP is anticipated to be heavily used by both HAF eligible and ineligible homeowners as they seek longer term solutions to successfully maintain homeownership. The National Foreclosure Mitigation Counseling (NFMC) program, its predecessor program, offered counseling for foreclosure prevention and mitigation. Much like HAF, it is a targeted program for homeowners in distress. The Agency ensured homeowners during the Great Recession knew of and were offered help in navigating foreclosure prevention and mitigation solutions with their mortgage servicers.

The Agency will rely on the expertise gained through our multitude of programs but perhaps most specifically from our administration of HHF programs for a decade. The Agency is confident in its ability to replicate past success based on both HPP and HHF experience, leveraging historical knowledge and partnerships gained through the previous programs. In addition, the Agency intends to utilize the skills of reputable outside vendors to help administer various aspects of the HAF program. The experience gained through designing these targeted programs, in emergent situations prepares the Agency to successfully launch the HAF program.

Through administering the HHF programs, the Agency recognized the vital importance of having a safe, secure and efficient data-sharing system. In collaboration with the other 17 states who received HHF, the U.S. Department of the Treasury and major servicers, the Common Data File (CDF) was created. Prior to the CDF, each HFA had to develop individual relationships with servicers to ensure their participation in the program and transmit data based on each servicer's criteria. This individualized approach caused delays in program implementation and slowed assistance to households in need. The CDF streamlined the process for data transmission and allowed servicers to become more comfortable with the HHF programs, especially those who worked across state lines. With one central data management system applications could be sent and reviewed overnight, drastically increasing the speed at which households received assistance. The Agency will take this valuable lesson and apply the same understanding to the HAF programs. The Agency will advocate for any opportunities to safely streamline data sharing and access and ensure consistent reporting across HFAs, with servicers and Treasury. There is consensus among the HFAs that participated in HHF that the CDF was an invaluable tool and its use with HAF programs is critical to HAF program success. The Agency supports any efforts to update or repurpose the HHF CDF.

Program expertise sharing occurs regularly across state agencies with regard to multiple design elements for HAF program. This coordination and collaboration has been vital to the Agency's planning process. The National Council of State Housing Agencies has provided a useful convening platform with weekly calls to think through some of the complexities found in addressing the demands of the program. The Agency dedicated staff time to ensure representation at the NCSHA HAF meetings, at which HFAs shared program design ideas, discussed compliance requirements and collaborated to build strong programs and outreach efforts. The Agency connected other HFAs with the Federal Home Loan Bank of Atlanta to discuss their forbearance data, a much-needed resource for the HAF Needs Assessment. The ideas shared and questions posed at these meetings helped inform the Agency's program design and targeted outreach strategies and are reflected in this plan. The Agency will continue attending meetings with other HFAs, held through NCSHA and on a regional basis as program design and implementation progress.

In addition to partnering with other HFAs, the Agency engages a variety of partners across the state on a regular basis. The strength of these partnerships will help ensure the success of the HAF program. The Agency has partnered with 89 local governments, 182 lending institutions, 3,380 loan officers, 6,657 real estate agents, 19 housing counseling organizations and 109 nonprofits groups. More than 700 mortgage servicers participated with the HHF programs and the Agency expects many of these strong partnerships to continue for the duration of the HAF program.

The Agency has longstanding partnerships with many federal and state agencies. Through our program outreach efforts, we will specifically contact the Department of Veteran Affairs, the Department of Health and Human Services, the U.S. Department of Agriculture and the North Carolina Rural Center, among others. The Agency plans to utilize the partnership with North Carolina Habitat for Humanity to ensure eligible Habitat homeowners are made aware of the HAF program. These entities will aid in the communication and outreach efforts to low-income and socially disadvantaged communities.

Readiness to Implement the Program

Staffing & Systems

The Agency's staff is well positioned to launch the HAF program efficiently and effectively. The experience gained through administering the HHF programs and HPP prepared staff to manage statewide homeowner assistance for homeowners in dire need due to economic turmoil. The Agency successfully launched the HHF program and hurricane related disaster recovery programs in a timely and effective manner. The same expeditious attention will be provided to the HAF program. The Agency has approximately 12 subject matter experts on staff who were crucial to the success of HHF and will be assisting in the rollout of HAF. They will continue to share their expertise with other staff, ensuring their knowledge is used to benefit the entire program.

Outside of administering the HHF program and the other programs mentioned above, the Agency has decades of expertise running homebuyer assistance, first-time home buyer assistance and down payment assistance programs. Agency staff review, underwrite and approve loans for our homebuyer programs which includes mortgage and down payment assistance. Managing these programs has built the subject matter expertise and technical prowess of staff that will be required in the HAF program.

In May, the Agency released a Request for Information (RFI) from potential vendors on an array of software, call center, payment processing and other related program administration services. There were 24 respondents to the RFI. The Agency plans to make its selection of vendor and services needed by the end of June. After vendor selection, the Agency will work quickly to finalize procedures for the operation of the program.

Reporting & Compliance

Agency staff across departments will ensure HAF compliance and reporting requirements are met. Administering the HHF programs prepared the Agency to take on such efforts. Initially, without a required reporting template, the Agency pulled data to respond to compliance inquiries. However, there were some variations across departments based on specific requests. As the Agency expanded its HHF programs, the Information Technology group (IT) was able to develop comprehensive report builders which captured all relevant data. These report builders ensured consistent use of metrics across departments and enabled the ability to track program shifts and success across time. In addition to the IT department, a dedicated Business Intelligence (BI) group collaborates across departments, including IT, to ensure consistent reporting for all programs. BI played a central role in collecting, analyzing and reporting data for the HHF program. They will continue to be involved in reporting and compliance for the HAF program. The Agency will be able to utilize the existing reporting framework to quickly adapt systems to capture necessary data for the HAF program. The Agency will also ensure any selected vendors will partner with internal reporting staff and adhere to all reporting requirements established by Treasury and the State.

The Agency established a dedicated quality assurance team to ensure accurate underwriting of the HHF program applications and loans. An internal group of Agency staff, with specialized skills, reviewed applications and loan documents to ensure quality control. Each new contractor's underwriting was reviewed during an initial trial period to ensure everyone working on applications followed the same guidelines. This same level of quality control will be applied to the Agency's administration of the HAF program.

Contracts & Partnerships

In addition to the Agency's experienced staff, partnerships are being formed with qualified vendors to administer various aspects of the program. The Agency met informally and witnessed demos with several vendors through various HAF meetings. The data gathered from these meetings helped the Agency better align the RFI with both the Treasury requirements and industry standards. The interest from 24 vendors represented a significant increase from the HHF's launch nearly a decade ago. At the time, only a limited number of vendors worked with the Agency. This shifting dynamic highlights both the changes in the affordable housing field and the presence of the Agency as a major player in the industry. The Agency will continue to identify professional, efficient vendors with high levels of customer service to assist in program administration. After the final vendors have been identified, contracts will be signed to ensure compliance with all federal and state requirements and to ensure quality service for North Carolina homeowners. These partnerships will be crucial to the delivery of the program and the Agency will ensure all reporting and compliance metrics are met.

Pilot Program

The Agency does not plan to implement a pilot program specific to the HAF program. As shown in the Needs Assessment, low-income homeowners around North Carolina are in urgent need of assistance. Opening the program to eligible households across the state as quickly and efficiently as possible is the Agency's central goal. The years of experience with HPP and HHF programs have sufficiently prepared the organization and staff to quickly administer such a program while ensuring eligibility, compliance and reporting requirements are all met.

Budget

North Carolina will receive $273,337,247 from the Homeowner Assistance Fund. The Agency will dedicate at least $232,336,660 (85%) to assistance to homeowners. No more than $41,000,587 (15%) will be used for the administration of the program.

Appendix

Indicator Selections and Definitions

Social Disadvantage Subindex

- *Percentile rank of social vulnerability*: Social vulnerability level as defined by index created by the Centers for Disease Control (CDC SVI 2018)
- *Share of nonwhite homeowners:* percent of households with a non-White householder that are owner households between 2015 – 2019 (2015-2019 ACS data)

Housing Distress Subindex

- *90+ day delinquency rate:* percent of mortgages delinquent by 90 days or more, regardless of forbearance status, of the total loan count in a geography (county). Based on the CoreLogic Market Trends Report. There is approximately a 75% to 90% loan coverage, varying by market.
- *Difference from start to peak 90+ day delinquency rate:* 90+ day delinquency rate from March, 2020 compared to the peak of each respective county. Based on the 90+ day delinquency rate from the CoreLogic Market Trends Report.
- *Forbearance rate:* percent of mortgages in forbearance agreements of the total number of loans in a geography (county). Based on the Federal Reserve Bank of Atlanta calculations using Black Knight's McDash Flash daily mortgage performance data (available with a two-day lag), U.S. Census Bureau 2017 FIPS Codes.
- *Difference from start to peak forbearance rate:* change in forbearance rate from March 2020 to the peak forbearance rate by each county. Based on the Federal Reserve Bank of Atlanta calculations using Black Knight's McDash Flash daily mortgage performance data (available with a two-day lag), U.S. Census Bureau 2017 FIPS Codes.
- *Non-forborne delinquency rate:* percent of mortgages 60 or more days delinquent, not in forbearance agreements, of the total number of loans in a geography (county). Based on the Federal Reserve Bank of Atlanta calculations using Black Knight's McDash Flash daily mortgage performance data (available with a two-day lag), U.S. Census Bureau 2017 FIPS Codes.

Economic Distress Subindex

- *Share of population with debt in collections:* percentage of people with a credit bureau record with any debt in collections (Urban Institute tabulations of credit bureau data, October 2020)
- *Unemployment rate:* percentage of labor force that is unemployed (Bureau of Labor Statistics)
- *Difference from start to peak unemployment rate*: the difference between the highest unemployment rate during the pandemic and the start of the pandemic (March 2020)

Housing Assistance Fund Priority Outreach Index

Note: Measures expressed as percentile rankings ranging from 0 to 1, with higher values indicating greater social disadvantage, housing insecurity and economic distress. For overall ranking, 1 – 25 would correspond to 75 percentile and above.

County	Social Disadvantage	Housing Distress	Economic Distress	Overall	Overall Ranking
Alamance	0.60	0.42	0.51	0.51	50
Alexander	0.32	0.28	0.33	0.31	69
Alleghany	0.21	0.08	0.24	0.09	91
Anson	0.88	0.70	0.80	0.83	18
Ashe	0.12	0.36	0.07	0.16	84
Avery	0.14	0.10	0.06	0.07	93
Beaufort	0.56	0.41	0.42	0.44	56
Bertie	0.96	0.97	0.69	0.95	6
Bladen	0.88	0.85	0.67	0.86	15
Brunswick	0.20	0.03	0.76	0.14	86
Buncombe	0.16	0.33	0.52	0.32	68
Burke	0.49	0.48	0.75	0.54	47
Cabarrus	0.43	0.48	0.36	0.41	59
Caldwell	0.27	0.88	0.84	0.72	29
Camden	0.24	0.47	0.03	0.24	76
Carteret	0.18	0.05	0.12	0.04	96
Caswell	0.75	0.69	0.66	0.75	26
Catawba	0.37	0.25	0.70	0.38	62
Chatham	0.31	0.01	0.01	0.01	99
Cherokee	0.17	0.04	0.48	0.08	92
Chowan	0.70	0.22	0.43	0.42	58
Clay	0.01	0.35	0.23	0.20	80
Cleveland	0.59	0.53	0.91	0.65	36
Columbus	0.80	0.98	0.78	0.93	8
Craven	0.64	0.32	0.29	0.39	61
Cumberland	0.84	0.96	0.96	0.99	2
Currituck	0.08	0.19	0.35	0.19	81
Dare	0.02	0.40	0.86	0.36	64
Davidson	0.36	0.61	0.53	0.52	49
Davie	0.25	0.12	0.15	0.11	89
Duplin	0.79	0.90	0.27	0.80	21
Durham	0.71	0.16	0.10	0.33	67
Edgecombe	0.93	0.76	0.99	0.92	9
Forsyth	0.58	0.63	0.57	0.58	43
Franklin	0.48	0.37	0.38	0.40	60
Gaston	0.38	0.87	0.89	0.76	25
Gates	0.53	0.99	0.21	0.81	20
Graham	0.43	0.57	0.97	0.64	37
Granville	0.62	0.75	0.13	0.55	46
Greene	0.93	0.93	0.24	0.87	14
Guilford	0.65	0.65	0.82	0.74	27

Halifax	0.96	0.77	0.90	0.91	10
Harnett	0.63	0.60	0.64	0.61	40
Haywood	0.00	0.17	0.46	0.13	87
Henderson	0.08	0.07	0.17	0.06	94
Hertford	0.99	0.74	0.72	0.84	17
Hoke	0.87	0.95	0.91	0.98	3
Hyde	0.73	0.67	0.55	0.68	33
Iredell	0.21	0.24	0.44	0.28	72
Jackson	0.34	0.31	0.61	0.37	63
Johnston	0.35	0.73	0.14	0.47	53
Jones	0.81	0.78	0.27	0.70	31
Lee	0.66	0.59	0.74	0.63	38
Lenoir	0.90	0.64	0.59	0.78	23
Lincoln	0.11	0.15	0.16	0.10	90
Macon	0.03	0.58	0.17	0.34	66
Madison	0.08	0.23	0.31	0.18	82
Martin	0.77	0.71	0.40	0.67	34
McDowell	0.45	0.54	0.77	0.56	45
Mecklenburg	0.57	0.51	0.60	0.53	48
Mitchell	0.05	0.29	0.55	0.26	74
Montgomery	0.67	0.44	0.34	0.49	51
Moore	0.21	0.02	0.19	0.05	95
Nash	0.77	0.62	0.82	0.79	22
New Hanover	0.26	0.13	0.47	0.22	78
Northampton	0.92	0.34	0.63	0.57	44
Onslow	0.51	0.83	0.39	0.60	41
Orange	0.29	0.00	0.00	0.00	100
Pamlico	0.55	0.30	0.19	0.35	65
Pasquotank	0.60	0.72	0.73	0.66	35
Pender	0.42	0.55	0.37	0.46	54
Perquimans	0.40	0.18	0.45	0.30	70
Person	0.67	0.79	0.64	0.73	28
Pitt	0.69	0.27	0.53	0.48	52
Polk	0.13	0.46	0.09	0.25	75
Randolph	0.41	0.79	0.71	0.62	39
Richmond	0.82	0.86	0.88	0.90	11
Robeson	1.00	0.92	0.91	1.00	1
Rockingham	0.54	0.67	0.84	0.69	32
Rowan	0.52	0.56	0.81	0.59	42
Rutherford	0.47	0.21	0.94	0.45	55
Sampson	0.85	0.94	0.30	0.85	16
Scotland	0.98	0.82	1.00	0.96	5
Stanly	0.30	0.11	0.24	0.15	85
Stokes	0.06	0.38	0.22	0.21	79
Surry	0.46	0.45	0.48	0.43	57
Swain	0.72	0.91	0.78	0.88	13
Transylvania	0.04	0.05	0.04	0.02	98
Tyrrell	0.74	0.65	0.62	0.71	30

Union	0.19	0.39	0.02	0.17	83
Vance	0.93	0.88	0.98	0.97	4
Wake	0.38	0.14	0.05	0.12	88
Warren	0.91	0.52	0.95	0.82	19
Washington	0.86	1.00	0.68	0.94	7
Watauga	0.07	0.09	0.08	0.03	97
Wayne	0.76	0.81	0.58	0.77	24
Wilkes	0.33	0.26	0.31	0.29	71
Wilson	0.83	0.84	0.87	0.89	12
Yadkin	0.28	0.20	0.41	0.27	73
Yancey	0.14	0.42	0.10	0.23	77