

## Consultation

The North Carolina Housing Finance Agency (NCHFA) consulted with stakeholders throughout the development of the HOME-ARP allocation plan through online forums, individual consultations and web-based surveys. Stakeholders were asked to provide input on the needs, service gaps, and potential uses of funds in their communities. NCHFA’s efforts are summarized below.

- NCHFA convened local participating jurisdictions within North Carolina that received HOME-ARP funds to help coordinate the to coordinate use of funds. Representatives from 20 participating jurisdictions were invited; 13 representatives from 10 participating jurisdictions attended.
- NCHFA held three listening sessions for interested stakeholders, consistent with the required consultations found in [CPD-21-10](#). Sessions were publicized via email, website, and social media. A total of 103 individuals representing at least 40 organizations participated.
- NCHFA created and distributed a survey via email, website and social media. A total of 94 individuals responded.
- NCHFA attended 5 stakeholder meetings to inform participants of the HOME-ARP funding including three with the local leadership group of North Carolina Coalition to End Homelessness, a convening of state and local Human Relation Councils and Commissions and the Governor’s Working Group on Veterans, Service Members and their Families.
- NCHFA staff also held 5 virtual meetings with stakeholders.

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Local HOME participating jurisdictions (13 attendees)	Public agencies that address the needs of the qualifying populations <ul style="list-style-type: none"> <li>• All qualifying populations</li> </ul>	Online forum (11/4/21)	<ul style="list-style-type: none"> <li>• Identified services, non-congregate shelter for families and youth, affordable rental housing for households earning less than 30% AMI as priority needs in their communities</li> <li>• In many communities, voucher holders were unable to find housing</li> <li>• High cost of land and construction prices make development difficult</li> </ul>
NC Emergency Solutions Grant Program, NC Department of Health and Human Services	Public agencies that address the needs of the qualifying populations <ul style="list-style-type: none"> <li>• Homeless service providers</li> </ul>	Virtual meeting (11/10/21)	<ul style="list-style-type: none"> <li>• Several regional committees across the state lack sufficient shelter capacity. In addition to geographic coverage, there is an unmet demand within specific populations.</li> <li>• Extend financial assistance for households receiving</li> </ul>

			<p>ESG-CV to prevent homelessness</p> <ul style="list-style-type: none"> <li>• Support a flexible housing fund for low-income households</li> <li>• Increase non-profit capacity</li> </ul>
<p>NC Office of Recovery and Resiliency, NC Department of Public Safety</p>	<p>Public agencies that address the needs of the qualifying populations</p> <ul style="list-style-type: none"> <li>• All qualifying populations</li> </ul>	<p>Virtual meeting (11/19/21)</p>	<ul style="list-style-type: none"> <li>• Extend rental assistance to HOPE households to prevent homelessness</li> <li>• Create more affordable housing rental units</li> </ul>
<p>NC Coalition to End Homelessness</p>	<p>Homeless service providers &amp; domestic violence service providers</p>	<p>Virtual meetings 12/2/21 2/26/22 6/15/22</p>	<ul style="list-style-type: none"> <li>• Provide funding for services, rental assistance in permanent supportive housing</li> <li>• Increase permanent supportive housing for the homeless</li> <li>• Provide access to Targeted Units for homeless service providers</li> <li>• Work with landlords on tenant selection policies</li> </ul>
<p>Public Housing Authorities (28 attendees)</p>	<p>Public housing agencies</p>	<p>Online forum (12/8/21)</p>	<ul style="list-style-type: none"> <li>• Preservation and rehabilitation of existing public housing is needed</li> <li>• Finding landlords that are willing to accept vouchers is an ongoing challenge</li> <li>• Affordable 1- and 2-bedroom rental units are needed</li> <li>• Payment standards are too low in some counties</li> <li>• Funding for job training and other programming is needed</li> </ul>
<p>Continuums of Care and Service Providers (63 attendees)</p>	<p>Public agencies that address the needs of the qualifying populations</p> <ul style="list-style-type: none"> <li>• Continuums of Care</li> </ul>	<p>Online forum (12/9/21)</p>	<ul style="list-style-type: none"> <li>• Several counties in the Balance of State have no emergency housing</li> <li>• Permanent supportive housing and rental units for households below 30% AMI are the greatest need</li> </ul>

	<ul style="list-style-type: none"> <li>• Homeless service providers</li> </ul>		<ul style="list-style-type: none"> <li>• Lack of affordable housing creates challenges for finding placements for homeless</li> <li>• More intensive case management and support services are needed</li> <li>• Mismatch between needs of specific populations experiencing homelessness and shelter types</li> </ul>
Opportunity and Well-Being Division, Office of Healthy Opportunities & Transitions to Community Living, North Carolina Department of Health and Human Services	<p>Public agencies that address the needs of the qualifying populations</p> <ul style="list-style-type: none"> <li>• Public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities</li> </ul>	Virtual meeting (12/17/21)	<ul style="list-style-type: none"> <li>• Extend rental assistance to households in the HOPE and Back@Home programs to prevent homelessness</li> <li>• Expand support services in permanent supportive housing</li> </ul>
Veteran Services of the Carolinas	Veterans' group	Virtual meeting (1/11/22)	<ul style="list-style-type: none"> <li>• Need for landlord engagement in accepting rental subsidies and a shortage of affordable units</li> <li>• Employment and financial skills training are needed</li> <li>• Specific populations (men with children, registered sex offenders, people with pets) have difficulties accessing shelter</li> </ul>
Fair housing advocates, disability advocates and civil rights organizations (13 attendees)	Public and private organizations that address fair housing, civil rights, and the needs of persons with disabilities	Online Forum (1/13/22)	<ul style="list-style-type: none"> <li>• Waiting lists for housing choice vouchers and targeted units are long</li> <li>• Lack of affordable housing is the biggest barrier</li> <li>• Rental assistance programs started in response to a pandemic are coming to an end and there is infrastructure to distribute rental assistance</li> </ul>
Office of Policy and Office of Healthy	Public agencies that address the needs of	Virtual Meetings	<ul style="list-style-type: none"> <li>• Shared insights on needs for rental units, support</li> </ul>

<p>Opportunities, NC Department of Health and Human Services</p>	<p>the qualifying populations</p> <ul style="list-style-type: none"> <li>• Homeless service providers</li> <li>• Domestic violence service providers</li> <li>• Public or private organizations that address fair housing, civil rights and the needs of persons with disabilities</li> </ul>	<p>2/24/2022 3/29/2022 4/13/2022 4/27/2022</p>	<p>services, rental assistance and non-congregate shelters (NCS). NC DHHS is supportive of increased investments in rental development, support services and rental assistance. Their support for NCS was stronger for the geographies where no shelter is currently in place.</p>
<p>Senior Consultant for the Technical Assistance Collaborative and Independent Reviewer for North Carolina’s Department of Justice Olmstead Settlement</p>	<p>Public and private organizations that address fair housing, civil rights, and the needs of persons with disabilities</p>	<p>Virtual Meetings 5/9/2022 6/6/2022</p> <p>Phone Calls 5/11/2022 5/12/2022</p>	<ul style="list-style-type: none"> <li>• North Carolina is currently under the Olmstead Settlement requiring the state to expand access to community-based services and supportive housing for individuals living with disabilities</li> <li>• The DOJ Independent Reviewer indicated NC Housing Finance Agency should focus the HOME-ARP funds on increasing the supply of affordable rental housing in North Carolina</li> </ul>
<p>Survey respondents (94 respondents)</p>	<p>Various</p>	<p>Online Survey (11/23/22 – 4/1/22)</p>	<ul style="list-style-type: none"> <li>• Development and preservation of affordable housing ranked highest in priority among eligible activities</li> <li>• All responses included as an attachment</li> </ul>

A full table of stakeholders is included in the appendix along with written comments collected during listening sessions and survey responses.

### **Feedback Summary:**

Feedback received from the above consultations and survey results addressed several of the State's plan design questions, allowing a more refined approach to the allocation of resources across the eligible uses. The primary pieces of information that influenced our design were:

- The broadly articulated need for the development of more affordable housing units is reflected in the total funds the State plans to dedicate to rental housing development.
- The need for some form of subsidy to allow for the affordability of the units is reflected in the inclusion of operating costs in the project award, which will allow the rents to be affordable to the tenants with extremely low incomes through the duration of the affordability period.
- The lack of an emergency shelter in over 20 counties and mismatch of shelter service populations with need in other counties in North Carolina is reflected in the allocation of resources to create two to three non-congregate shelters in these under- and unserved counties.
- The need for support services for many households in the qualified populations is reflected in the requirement of support services capacity in the application for rental development.

### Public Participation

*The public participation section will be finalized after the conclusion of the public comment period and public hearing. This section will include a summary of comments received and the steps taken to address those comments within the Allocation Plan.*

### Needs Assessment and Gaps Analysis

The NC Housing Finance Agency conducted a quantitative analysis of the housing available to households experiencing homelessness and the remaining gaps in the housing services systems. The tables below include homeless and housing data provided by HUD to help inform the housing needs in North Carolina. The first two tables include data for individuals experiencing homeless on one particular night in January. The total number of individuals experiencing homelessness in a given year will be significantly higher. The third table identifies beds available on a year-round basis. The calculated gap is based on individuals experiencing homelessness throughout the year and the beds and housing available year-round.

Homeless Households by Household Type, North Carolina				
	Emergency Shelter	Transitional Housing	Unsheltered	Total
Persons in households without children	3,421	952	2,325	6,698
Persons in households with at least one adult and one child	1,665	645	214	2,524
Persons in households with only children	26	13	18	58
<b>Total Homeless Households</b>	<b>5,112</b>	<b>1,610</b>	<b>2,558</b>	<b>9,280</b>

Source: Point in Time Count (PIT) 2020

Demographic Summary by Race, North Carolina						
	Emergency Shelter	Transitional Housing	Unsheltered	Total Homeless	Percent of Homeless Population	Percent of Total Population
Black or African American	2,855	929	973	4,757	51.3%	22.2%
White	1,988	596	1,476	4,060	43.7%	70.6%
Asian	24	2	4	30	0.3%	3.2%
American Indian or Alaska Native	43	17	33	93	1%	1.6%
Native Hawaiian or Other Pacific Islander	11	0	9	20	0.2%	0.1%
Multiple races	191	66	63	320	3.5%	2.3%
<b>Total</b>	<b>5,112</b>	<b>1,610</b>	<b>2,558</b>	<b>9,280</b>	<b>100%</b>	<b>100%</b>

Source: Point in Time Count (PIT) 2020

	<b>Current Housing and Emergency Shelter Inventory, North Carolina</b>				
	Family		Adults Only	Child-Only	Total Year-Round beds
	# of Beds	# of Units	# of Beds	# of Beds	
Emergency Shelter	2,282	541	3,614	36	<b>5,932</b>
Safe Haven	15	5	0	5	<b>20</b>
Transitional Shelter	880	315	1,086	10	<b>1,976</b>
Permanent Supportive Housing	2,476	732	3,698	0	<b>6,174</b>
Rapid Re-Housing	1,172	375	434	0	<b>1,606</b>
Other Permanent Housing	274	84	113	0	<b>387</b>
<b>Grand Total</b>	<b>7,099</b>	<b>2,052</b>	<b>8,945</b>	<b>51</b>	<b>16,095</b>

Source: Continuums of Care Housing Inventory Count (HIC) 202

<b>Gap Analysis of Rental Housing, North Carolina</b>			
	<b>Current Inventory</b>	<b>Level of Need</b>	<b>Gap Analysis</b>
	# of Units	# of Households	# of Households
Total rental units	1,473,840		
Rental units affordable to HH at 30% AMI	171,550		
Rental units affordable to HH at 50% AMI	455,190		
0 – 30% AMI Renter HH w/ 1 or more severe housing problems		210,125	
30 – 50% AMI Renter HH with 1 or more severe housing problems		188,710	
<b>Current Gaps</b>			<b>353,005</b>

Source: Comprehensive Housing Affordability Strategy (CHAS), 2014 – 2018

## **Describe the size and demographic composition of qualifying populations within the PJ's boundaries**

HOME-ARP funds must be used to primarily benefit individuals or families from the following qualified populations.

- Homeless
- At-risk of homelessness
- Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking
- Other populations where providing supportive services or assistance would prevent homelessness or serve those with the greatest risk of housing instability
- Veterans and families that include a veteran family member that meet one of the preceding categories

### ***Homeless population***

Households can become homeless after a period of housing instability or due to an unpredicted situation that causes them to flee or lose housing. Without access to permanent, stable housing, some households may experience ongoing cycles of housing instability and homelessness. Using HUD's definition of "homeless"<sup>1</sup>, NCHFA will consider a family or individual to be homeless if they meet any of the following:

- Lack a permanent and adequate home or are living in a shelter designated to provide temporary living arrangements
- Will imminently lose their permanent home or temporary living arrangements due to lack of resources or support network
- Are under the age of 25 and do not have a permanent home

According to the 2020 Point in Time (PIT) Count, a total of 9,280 North Carolinians experienced homelessness on one night in January 2020. Of those experiencing homelessness, 6,722 people (72%) were sheltered while 2,558 (28%) were unsheltered. The Annual Count, one of six System Performance Measures required by HUD, captures the number of people experiencing homelessness across 12 months in emergency shelter and traditional housing. According to this number, 19,478 North Carolinians sought shelter in 2020. Most people (61%) in emergency and transitional shelters were experiencing homelessness for the first time. An estimated 27,350 North Carolinians experienced homelessness in 2020.<sup>2</sup>

Adults with no children account for most people experiencing homelessness; 75% of people experiencing homelessness were adults above age 24 while 18% were under 18. Adults over 24 were more likely to be unsheltered whereas children were more likely to be sheltered. Most children experiencing homelessness were accompanied by at least one adult; only 1% of children were without an adult.

Of those experiencing homelessness, 14% were chronically homeless, meaning they had experienced homelessness for at least a year, or repeatedly, and had a disabling condition such as substance abuse,

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<sup>1</sup> [http://uscode.house.gov/view.xhtml?req=\(title:42%20section:11302%20edition:prelim\)](http://uscode.house.gov/view.xhtml?req=(title:42%20section:11302%20edition:prelim))

<sup>2</sup> <https://www.csh.org/wp-content/uploads/2013/08/Estimating-the-Need.pdf>

severe mental illness or physical disability. Survivors of domestic violence accounted for 9% of this population, as did veterans.

Due to historic and systemic racism, Black, Indigenous and People of Color experience homelessness at a disproportionate rate in communities across the country. According to the Racial Disparities and Disproportionality Index created by the Corporation for Supportive Housing, Black people and Native American people are overrepresented in the North Carolina homeless system, while White, Asian and Latinos are underrepresented. Whereas Black people represent 20% of the total population of the state; they make up 50% of the population experiencing homelessness. Meanwhile, White people represent 66% of the total population but 44% of those experiencing homelessness. However, White people have higher than expected unsheltered homelessness given their proportion of the population. The percentage of people who identify as Hispanic, Asian or Native American stays consistent in the overall sheltered and unsheltered populations.

### ***Individuals and families at risk of homelessness***

HUD defines those at risk of homelessness as individuals or families who have an annual income below 30 percent of median family income, do not have sufficient support networks or resources to prevent them from becoming homeless or live in unstable conditions as demonstrated by frequent moves or living in the another's home due to hardship.

According to the latest CHAS data (2014-2018), North Carolina has 441,175 households earning below 30% of area median family income. Of those extremely low-income households, 64% or 282,480 are renter households. The majority (73%) of extremely low-income renters are cost burdened (i.e. spending more than 30% of their income in housing costs) and 63% of extremely low-income renters are severely cost-burdened (i.e. spending more than 50% of their income on housing costs). Housing cost burden is not experienced evenly by all demographic groups. For example, 19% of White renter households are cost burdened while 24% of Black households, 15% of Asian households and 27% of Hispanic households pay more than 30% of their income on housing. In addition to cost-burden, overcrowding or the lack of kitchen or plumbing facilities could be indicative of unstable conditions. Most extremely low-income renters (74%) experience at least one of these housing challenges.

### ***Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking***

According to the North Carolina Council for Women and Youth Involvement, service providers across the state received 126,608 calls and chats to their hotline and provided in person or remote services for 78,941 people between July 2020 and June 2021.<sup>3</sup>

Of those receiving services, 4,716 reported experiencing homelessness or housing insecurity. The following demographics were identified from clients who disclosed demographic information:

- 82% identified as women, 13% as men, and 5% as other or unknown.
- 38% identified as White, 32% as Black/African American, 1% as Native American, 1% as Asian, and 8% as some other race or two or more races, and 20% chose not to disclose their race.

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<sup>3</sup> <https://ncadmin.nc.gov/about-doa/divisions/council-for-women/women-statistics>

- 13% were under 18, 71% were between 18 and 59, 5% were over 60, and 11% did not disclose their age.

The most common services provided for clients were information, advocacy, counseling and referrals. Shelter services including dedicated facilities, local safe homes and hotels were provided for 8,577 clients but 3,799 referrals were made to other shelters due to lack of capacity.

***Other populations requiring services or housing assistance to prevent homelessness or at greatest risk of housing instability***

Households who have previously qualified as “homeless”, are currently housed due to temporary or emergency assistance or need additional housing assistance or supportive services to avoid a return to homelessness also qualify for HOME-ARP. Additionally, HUD defines those at greatest risk of housing instability as households with an annual income less than 30% AMI who are paying more than 50% of their income towards housing or households with an annual income less than or equal to 50% AMI that meet certain conditions like living in another’s home, a hotel or motel, or moving multiple times in two months.

While a comprehensive estimate of households meeting this definition is difficult, a few available data points are indicative of need. North Carolina’s Emergency Rental Assistance Programs, including the HOPE Program and the 12 entitlement community programs, have assisted over 178,000 households financially impacted by the pandemic with rent and utilities.<sup>4</sup> Between December 2020 and December 2021, NC-211, an information and referral service provided by the United Way of North Carolina, received over 94,700 calls (42% of all calls) requesting information and services related to housing and shelter. Of those housing and shelter requests, 24% were requesting information about shelters, 22% wanted information on low-cost housing and 47% were looking for rental assistance.<sup>5</sup> These figures indicate additional need for resources and services to assist households experiencing housing instability.

**Describe the unmet housing and service needs of qualifying populations, including but not limited to:**

- **Sheltered and unsheltered homeless population**
- **Those currently housed populations at risk of homelessness**
- **Fleeing domestic violence**
- **Other families requiring services or housing assistance to prevent homelessness**
- **Those at greatest risk of housing instability or in unstable housing situations**

For households experiencing homelessness, a wide array of interventions is needed, from expanded outreach efforts to intensive case-management. The Center for Supportive Housing estimated 22,500 supportive housing units, defined as affordable housing with flexible services, are needed in North Carolina.<sup>6</sup> This estimate included individuals across different systems including homelessness, incarceration, child welfare and other institutional settings.

Individuals who are discharged from Adult Care Homes, state psychiatric hospitals or diverted from Adult Care Homes often need access to supportive housing to prevent homelessness or housing

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<sup>4</sup> Treasury ERA1 Oct spreadsheet

<sup>5</sup> NC 211 Counts Retrieved 12/7/21: <https://nc.211counts.org/>

<sup>6</sup> <https://www.csh.org/supportive-housing-101/data/#data-reports>

instability. In FY 2021, access for these populations choosing supportive housing was difficult for 50% of these individuals.<sup>7</sup>

An underlying cause of housing instability and homelessness is the gap between housing costs and what households can afford to pay. Between 2021 and 2022, rents in North Carolina increased, on average, 20% or \$200.<sup>8</sup> Increases in rent disproportionately impact low-income households whose earnings are insufficient to afford market rents.<sup>9</sup> Consequently, 63% of renters earning less than \$50,000 are cost burdened, meaning they spend more than 30% of their income on housing.<sup>10</sup>

For these households at risk of homelessness or experiencing housing instability, stakeholders across the state identified the following needs:

- Increased supply of affordable permanent supportive housing and rental housing
- Increased supply of non-congregate shelter, especially in communities without a shelter
- Discharge planning for people released from institutional care (e.g. hospitals, prison, foster care)
- Additional staff capacity for case management and support services including training in house-centered case management, SSI/SSDI Outreach, Access, and Recovery and other effective practices
- Low-barrier shelters and crisis services
- Increased emergency shelter capacity that allow specific populations for whom there are not enough beds in current shelters or no shelters in their area that allow certain populations
- Coordination of crisis response system including referral linkages between crisis response system and supportive housing
- Housing navigation and support services to help households find housing and connect with resources
- Resources for intensive case management
- Short-term subsidies for rent and utilities for households that have received an eviction notice or are experiencing financial hardship
- Extension of rental subsidies enacted through other federal COVID response programs
- Moving costs, security deposits and first month's rent for homeless households to move into housing and households with housing choice vouchers
- More landlords and rental properties that accept housing choice vouchers
- More 1-bedroom or 2-bedroom units
- Rehabilitation of existing housing stock

As part of the consultation process NCHFA posted a survey to all local and state partners requesting feedback on the greatest housing and service needs in North Carolina. According to the 94 survey responses collected between November, 2021 and March, 2022, development of affordable rental units

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<sup>7</sup> Knisley, M.B. (2021) FY 2021 Final Annual Report of the Independent Review in the Matter of United States of America v. The State of North Carolina.

<sup>8</sup> <https://abc11.com/rent-prices-increase-north-carolina-affordable-housing/11533489/>

<sup>9</sup> <https://reports.nlihc.org/sites/default/files/oor/files/reports/state/nc-2021-oor.pdf>

<sup>10</sup> ACS 2015-2019

was the most prevalent top ranked need to address homelessness.<sup>11</sup> Both urban and rural respondents indicated developing additional rental units as crucial to serving individuals experiencing homelessness. The other top identified need in serving the homeless community is the lack of affordable rental units, emergency shelters and supportive services. NCHFA aims to address these needs through our HOME-ARP Program.

Although interventions will vary by household, the qualifying populations broadly share the need for affordable and available permanent housing, a coordinated and flexible homeless assistance system, wrap-around services for those with intensive needs, and access to services and resources to prevent homelessness or further housing instability.

**Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing**

In fiscal year 2021, the state of North Carolina received an annual allocation of approximately \$95 million in federal formula grant funding, including the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME) grant, Emergency Solutions Grants (ESG), Housing Opportunities for Persons with HIV/AIDS (HOPWA) and National Housing Trust Fund. Administered through various state agencies, these funds are utilized to increase housing affordability and availability through the development and preservation of rental housing, funding for transitional housing and emergency shelter, as well as provision of support services. The Service providers in the state's twelve Continuum of Care Programs also received nearly \$30 million in grant funding from HUD in 2020. These awards went to 131 community-based housing and service providers in the state to support a broad array of interventions designed to assist individuals and families experiencing homelessness.

In response to the coronavirus pandemic, the federal government provided additional relief funding through several acts of legislation including the CARES Act, Coronavirus Response and Supplemental Appropriations Act, and the American Rescue Plan. Funding was provided for emergency rental assistance (\$1.1 billion), emergency housing vouchers (1,296 vouchers), homelessness response through the Emergency Solutions Grant (\$54.4 million), mortgage assistance and foreclosure prevention through the Homeowner Assistance Fund (\$273 million) and housing counseling and stability through the Housing Stability Counseling Program (\$2.8 million).

Beyond federal resources, the State of North Carolina provides funding for housing and homelessness related activities through appropriations for the North Carolina Housing Trust Fund (NCHTF), Workforce Housing Loan Program and NC Department of Health and Human Services. In conjunction with the Low-Income Housing Tax Credit and state funds, NCHFA utilizes HOME and NCHTF to create and preserve affordable rental units. Properties receiving tax credits are required to participate in the Targeting Program, which sets aside between 10% and 20% of units for people with disabilities. NCHFA also offers the Supportive Housing Development Program to help nonprofit organizations and local governments build and rehabilitate emergency and permanent housing for people who are experiencing homelessness or have disabilities or other special needs such as substance use recovery. NCHFA

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<sup>11</sup> 94 responses do not represent every local PJ, municipal government, or stakeholder in North Carolina and is simply a sample. Some PJs are represented multiple times in the survey through the survey as different staff members provided feedback.

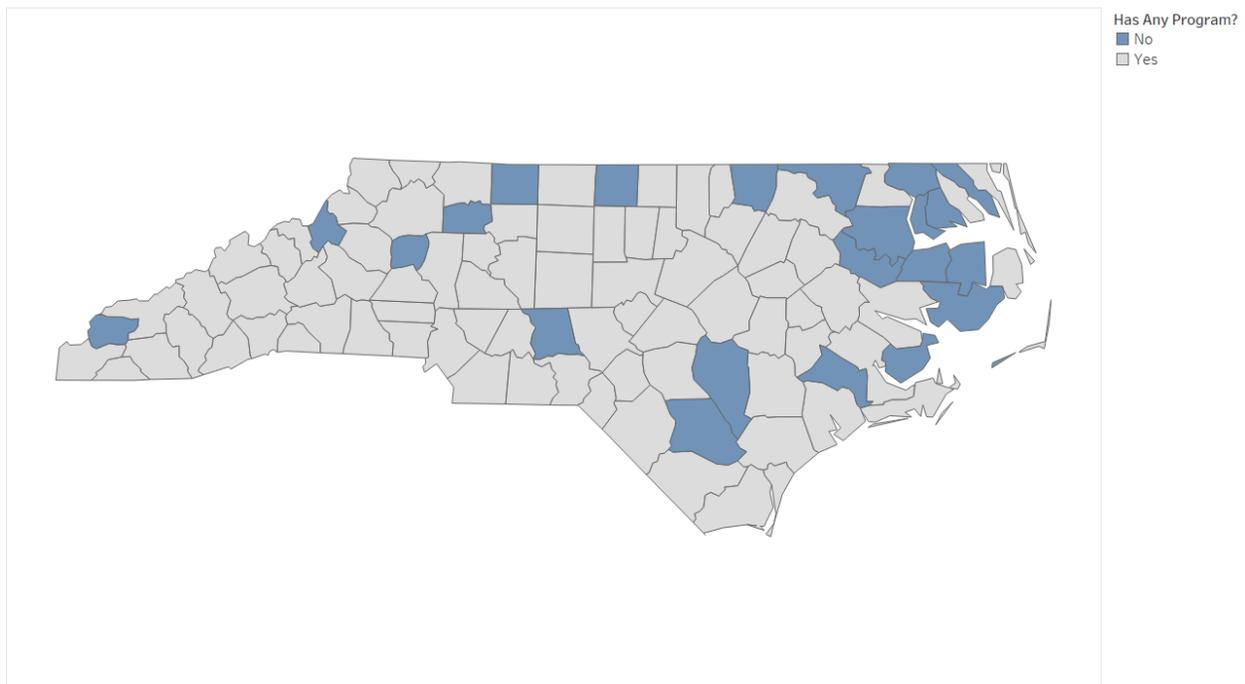
partners with DHHS to provide integrated permanent supportive housing options to North Carolinians across the state through the Integrated Supportive Housing Program (ISHP) and Transitions to Community Living Program (TCL). In 2021, the State supported TCL with \$16.4 million in Transition to Community Living Vouchers for 2,122 households, as well as \$10.6 million in Key Rental Assistance to 2,193 households.

The emergency and permanent housing available to low-income individuals with disabilities and those experiencing homelessness is insufficient to meet the needs of all eligible households. According to the 2020 HUD Continuum of Care Housing Inventory Count, North Carolina has a total of 7,928 year-round beds in emergency, safe haven and transitional housing, including 3,177 family beds, 861 family units and 4,700 emergency housing beds for adults. Throughout the state, there are nearly 6,200 permanent supportive housing (PSH) beds for families and adults with an additional 732 PSH units. 1,547 rapid re-housing beds and units are available to families experiencing homelessness and an additional 434 are dedicated to homeless adults. While housing providers across the state work diligently to serve people experiencing homelessness, the current emergency and permanent housing stock does not meet the need of the approximately 27,000 North Carolina individuals who experienced homelessness in 2020.

**Identify any gaps within the current shelter and housing inventory as well as the service delivery system.**

There is uneven access to crisis housing in North Carolina. According to 2020 Housing Inventory Counts, twenty-two counties in the state have no emergency shelter, rapid-rehousing, transitional housing or permanent supportive housing. Several other counties may only have crisis housing available for specific populations (i.e. fleeing domestic violence, veterans, families with children). Five counties only have shelters for individuals fleeing domestic violence. Three counties only have HUD-VASH programs. ESG administrators identified five regional committees (1, 2, 6, 8, 11) covering thirty-one counties that lack shelter capacity.

## Twenty-two counties do not have any shelters



Map based on Longitude (generated) and Latitude (generated). Color shows details about Has Any Program?. Details are shown for All counties. The view is filtered on Latitude (generated) and Longitude (generated). The Latitude (generated) filter keeps non-Null values only. The Longitude (generated) filter keeps non-Null values only.

Source: NCHFA analysis of 2020 HIC data

An underlying cause of homelessness and housing instability is the shortage of affordable rental housing across the state. Based on HIC and CHAS data, the NC Housing Finance Agency calculated a gap of over 350,000 units affordable and available to households earning less than 50% of the area median income. Although North Carolina has 137,107 federally supported rental units through LIHTC, Section 8, Public Housing and USDA programs, the number of North Carolinians in need of housing assistance far exceeds the resources of existing programs. In addition, 5% of these federally subsidized homes face expiring affordability restrictions in the next five years and 3,880 public housing units need immediate investment.<sup>12</sup> In addition, public housing authorities across the state have substantial waiting lists with wait times of up to several years. Meanwhile, households who receive Housing Choice Vouchers may face barriers to using their voucher including, lack of landlord participation, availability of public transit, discrimination by landlords, and prohibitive costs like security deposits. Consequently, in 2020 there were 69,928 authorized Housing Choice Vouchers for North Carolinians of which 86% were utilized,<sup>13</sup> leaving almost 10,000 voucher holders without stable housing. Communities across the state need more permanent and affordable rental housing that accepts vouchers.

In addition, the service delivery system in North Carolina is fragmented and in transition. The state has gone from a public Medicaid, regionally-based service delivery system, to a privatized Medicaid system with a broader provider network and varied points of access. The state has not expanded Medicaid, so many persons experiencing homelessness are not eligible for services.

<sup>12</sup> [https://preservationdatabase.org/wp-content/uploads/2021/08/PD-Profile\\_2021\\_NC.pdf](https://preservationdatabase.org/wp-content/uploads/2021/08/PD-Profile_2021_NC.pdf)

<sup>13</sup> <https://www.huduser.gov/portal/datasets/assthsg.html>

**Identify the characteristics of housing associated with instability and an increased risk of homelessness if the PJ will include such conditions in its definition of “other populations” as established in the HOME-ARP Notice**

NCHFA will utilize the definitions of other qualifying populations provided in the HUD Notice CPD-21-20. NCHFA will consider households experiencing housing cost burden and households living in substandard housing to qualify under the “other population” category. According to HUD’s Comprehensive Housing Affordability Strategy 2014-2018 data, 619,625 renter households, of all income levels, experience housing cost burden or live in substandard housing (i.e., lacking complete kitchen facilities, lacking complete plumbing facilities, or overcrowding). These households face unstable and unsafe housing conditions leading to greater risk of homelessness.

**Identify priority needs for qualifying populations**

Low-income households across North Carolina face barriers accessing affordable housing. While NCHFA has opted to not prioritize within the qualifying population over any other we recognize our role in helping to address the full spectrum of housing needs. Individuals experiencing homelessness or at risk of homelessness need access to a variety of housing interventions ranging from emergency non-congregate shelters, transitional housing to permanent rental housing. All qualifying populations will be eligible to apply for the housing which meets their current needs.

The state of North Carolina is currently under a Department of Justice (DOJ) Olmstead Settlement Agreement, which requires the state to develop and provide community-based housing options and services to individuals for persons with disabilities who reside in adult care homes and state psychiatric hospitals, as well as diversion from adult care homes. The state created the Transitions to Community Living (TCL) initiative to address the Olmstead Settlement Agreement. Individuals identified under TCL are likely members of one of the eligible qualifying populations and will be admitted into the HOME-ARP program accordingly.

**Explain how the level of need and gaps in its shelter and housing inventory and service delivery systems based on the data presented in the plan were determined.**

The level of need and gaps in inventory and systems were determined by analyzing multiple data sources and through consultation with stakeholders. NCHFA used two measures to understand homelessness in North Carolina – the Point-in-Time Homeless Count & Survey (PIT Count) and System Performance Measures (SPMs). Both measures are estimates and undercount the number the people who may experience homelessness. Additionally, there are populations experiencing homelessness that are not fully captured within existing measures, including doubled up households, and people temporarily staying in hotels, motels and other residential institutions. To estimate the number of people at risk of homelessness or experiencing housing instability, NCHFA used CHAS and American Community Survey to estimate the number of cost-burdened renters as well as households receiving Emergency Rental Assistance and calls to NC-211.

Analysis of the Housing Inventory Count revealed geographic gaps in crisis housing and shelter capacity. Consultation with stakeholders, including Continuums of Care and ESG administrators, confirmed findings from the analysis. The Corporation for Supportive Housing calculated the need for supportive

housing by state. Shortage of affordable rental units was determined using CHAS data and analysis from the National Low-Income Housing Coalition.

Lastly, NCHFA consulted with stakeholders through listening sessions, meetings, and an online survey to better understand issues on the ground in communities across the state. PHAs, Continuums of Care, and service providers provided anecdotal evidence of need as well as the number of households on waiting lists and shortages of rental housing.

### HOME-ARP Activities

**Describe the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors and whether the PJ will administer eligible activities directly:**

NCHFA will use HOME-ARP funds for rental development and non-congregate shelter. Eligible uses for non-congregate shelter will include acquisition alone, acquisitions and rehabilitation, new construction and rehabilitation without acquisition. Eligible uses for rental development will include acquisition, construction, rehabilitation and reconstruction. Acquisition of land or demolition is only permissible when HOME-ARP rental development will occur. Funding will be allocated through a competitive application process open to all eligible applicants, including non-profit, for profit and government entities. Funds may be awarded in multiple rounds, until all funds are disbursed.

A Notice of Funding Availability (NOFA), along with Application Guidelines and Instructions, will be posted on the NCHFA website and shared with stakeholders. These materials will describe the amount of funding available, eligibility criteria, funding requirements, selection criteria, and application process in further detail.

Applications will be processed and reviewed by NCHFA staff. All applications that meet or exceed threshold requirements, such as organizational capacity and experience, as well as financial stability, will be scored based on the project criteria. Rental project applications will be evaluated against other rental applications and likewise for non-congregate shelter projects. The projects will be ranked according to their total score. The applications ranked the highest and that are within the amount of funds available to the Program will be recommended to NCHFA's Board of Directors for financing approval.

Some of our program decisions will be informed by geographic need, such as the presences of emergency shelters in the region or availability of other HOME-ARP funds for development. Applications for non-congregate shelter received from counties with no existing shelter will be given a priority. Applications for non-congregate shelters in counties with existing shelters that are not in a local participating jurisdiction will be accepted but not given additional priority. No applications for non-congregate shelters located in participating jurisdictions will be accepted.

Applications for rental projects located within Local Participating Jurisdictions will be required to have a commitment of leveraged funds that will contribute to the sources of the proposed project. Although not required, rental applications from areas not served by a local Participating Jurisdiction will receive rating points for any funds leveraged for the proposed project.

**If any portion of the PJ’s HOME-ARP administrative funds were provided to a subrecipient or contract prior to HUD’s acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ’s entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ’s HOME-ARP program**

Not applicable. NCHFA did not contract any portion of its HOME-ARP administrative funds to a subrecipient or contractor prior to HUD’s approval of the allocation plan.

**Use of HOME-ARP Funding**

	<b>Funding Amount</b>	<b>Percent of the Grant</b>	<b>Statutory Limit</b>
Supportive Services	\$0	0.00%	
Acquisition and Development of Non-Congregate Shelters	\$6,000,000	9.15%	
Tenant Based Rental Assistance (TBRA)	\$0	0.00%	
Development of Affordable Rental Housing	\$49,752,118	75.85%	
Non-Profit Operating	\$0	0.00%	5.00%
Non-Profit Capacity Building	\$0	0.00%	5.00%
Admin and Planning	9,838,609	15.00%	15.00%
Total HOME-ARP Allocation	\$65,590,727	100.00%	

**Additional narrative, if applicable:** NCHFA will allocate \$49,752,118 to the development and operations of affordable rental housing and \$6,000,000 to acquisition and development of non-congregate shelters. If sufficient qualified applications are not received for one use, funds may be used to fund qualified applications for the other use or reserved for a subsequent competition.

NCHFA may use up to 5% of the administrative funds to provide technical assistance to assist less experienced applicants applying for HOME-ARP funds. NCHFA may reallocate unspent admin funds to program funding. Through years of experience administering federal programs, NCHFA has come to understand that more experienced applicants with additional resources, typically based in local participating jurisdiction regions, are more able to apply for public funding. Oftentimes, it is a challenge for community partners in communities in non-participating jurisdictions to apply for federal programs because of limited local capacity and pre-development experience. Technical assistance will support potential applicants in identifying eligible projects, explaining the requirements of various funding sources and provide other supportive functions to allow the applicant to submit a completed proposal. Applications submitted with the support of the technical assistance will be scored using the same thresholds as all other applicants.

**Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its Needs Assessment.**

NCHFA has identified the need to develop affordable rental housing as its top priority for the use of HOME-ARP funding. The quantitative and qualitative analyses identified the state's lack of affordable, rental units contributes most significantly to housing instability. The local partners from across various sectors indicated the lack of available units as a major issue when attempting to secure housing for their clients, even those with rental assistance. As discussed above, applicants from areas not represented by a local participating jurisdiction with their own HOME-ARP funds, and those with specific geographic need will be given additional points in the review process.

NCHFA will prioritize applications for NCS development from areas that do not have a shelter in a non-PJ area that has not received local HOME-ARP dollars. According to 2020 Housing Inventory Counts, twenty-two counties in the state have no emergency shelter, rapid-rehousing, transitional housing or permanent supportive housing. Several other counties may only have crisis housing available for specific populations (i.e. fleeing domestic violence, veterans, families with children). Five counties only have shelters for individuals fleeing domestic violence. Three counties only have HUD-VASH programs. ESG administrators identified five regional committees covering 31 counties that lack shelter capacity.

**Describe how the characteristics of the shelter and housing inventory, service delivery system and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities**

Households experiencing homelessness or housing instability require a range of interventions and supports to remain stably housed. NCHFA's outreach efforts and data analysis surfaced many of the challenges and potential strategies for addressing homelessness and housing instability in communities across our state. Although there are significant needs for every HOME-ARP eligible activity, increasing the supply of affordable rental housing and building additional shelter capacity in rural communities, not served by a local PJ, were consistently identified by stakeholders and reinforced by data findings.

NCHFA analyzed the gaps in the current housing and shelter inventory to frame the HOME-ARP program design. Through conversations with local PJs, regional partners and other state agencies providing housing and homeless services, NCHFA identified the most crucial housing needs. While need for every eligible activity exists across North Carolina, NCHFA prioritized rental development and non-congregate shelter to most effectively address the existing gaps in housing inventory while maximizing NCHFA's expertise in financing housing development.

There is a shortage of over 350,000 affordable rental units for households earning below 50% AMI. Homeless services providers, public housing authorities, partner state agencies and other stakeholders identified a lack of affordable units as a central barrier to addressing homelessness. Households who receive rental assistance, such as housing choice vouchers, may still face difficulties locating housing in a timely manner due to high housing costs and limited number of landlords participating in rental assistance programs. Additionally, local public housing authorities shared that they have significant wait lists for housing and need financing to preserve existing affordable units. NCHFA's experience developing supportive housing targeted to households earning less than 30% AMI has highlighted the difficulties developers face ensuring proper cash flow when the rents are affordable to lower-income households unless projects can structure higher rents and depend on extremely low-income applicants to obtain an external rental subsidy to afford the unit. As a result, NCHFA has determined offering

operating assistance will help successfully develop deeply affordable units and eliminate the need for applicants to search for and obtain a source of rental assistance in order to afford the unit while ensuring the projects are a success throughout the 15-year compliance period.

The Needs Assessment highlights the limited supply and uneven distribution of emergency housing across the state. NCHFA intends to help fill this gap by placing specific emphasis on adding to emergency shelters to areas with no shelters or regions with shelters that do not meet the demographics of the homeless population. For example, some communities have a domestic violence shelter with a small eligible population while there is a significant number of men experiencing homelessness in need of a shelter. Non-congregate shelters represent an ideal remedy to emergency housing shortages. Beyond meeting health considerations during the pandemic, they also present an opportunity to house multiple homeless populations depending on project structure and layout.

### HOME-ARP Production Housing Goals

#### **Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation**

NCHFA anticipates creating 165 affordable rental units utilizing the HOME-ARP funds. This goal is based on an estimate of \$225,000 per unit in development and construction costs and \$80,000 per unit in capitalized operating assistance for the entire 15-year compliance period and serve qualifying populations. NCHFA intends to capitalize the operating reserve for the project in a separate interest-bearing account. Based on discussions with affordable housing providers and the Agency's experience, an operating assistance reserve is essential to ensuring the project is sustainable throughout the compliance period. While most qualifying populations do not have income-based eligibility criteria, they will likely be earning less than 30% of the area median income. As a result, any affordable rents would be less than the rents needed to cover the operating costs for the property, making the operating assistance reserve necessary to ensure deep affordability for the compliance period. With the \$6 million allocated to non-congregate shelter development, NCHFA anticipates funding two to three shelters.

#### **Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how it will address the PJ's priority needs**

The 165 affordable rental units NCHFA predicts developing will be supplemented by additional non-congregated shelter development utilizing the remainder of the HOME-ARP funds. Throughout the listening sessions NCHFA heard the lack of affordable rental units is a major barrier to addressing homelessness. While 165 additional affordable units will not fully address the housing gap in North Carolina, offering operating assistance on all HOME-ARP projects will streamline access to these units by eliminating the need for applicants to first secure a source of rental assistance before applying for the housing units and will ensure these units are well maintained for at least 15 years. Additionally, many regions, especially those in more rural areas, lack emergency shelters to house people experiencing homelessness. NCHFA aims to address both of these needs through achieving our goal of developing affordable rental units and non-congregate shelters.

## Preferences

### **Identify whether the PJ intends to give preferences to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project**

The State's HOME-ARP funds may serve all qualifying populations, with prioritization given on a project level based on demonstrated need, while ensuring compliance with fair housing, civil rights and other anti-discriminatory laws. Funding at the state level will not be prioritized for specific qualifying populations or a subset of members of a qualify population over another. Given that needs vary across the state and different areas will have both different needs and different capacity to meet those needs, any prioritization will be done at a project level to best address the needs of the local community. Funds will be awarded based on the elements of the NOFA demonstrating feasibility, capacity and need.

### **If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or category of qualifying population, consistent with the PJ's needs and gap analysis**

The PJ does not intend to preference one qualified population over another.

### **If a preference was identified, describe how the PJ will use HOME-ARP funds to address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the preference**

The PJ does not intend to preference one qualified population over another.

## Appendix

<b>Agency/Org Consulted</b>	<b>Type of Agency/Org</b>	<b>Method of Consultation</b>
U.S. Department of Justice Independent Reviewer	Federal Government	Virtual Meeting
First Health of the Carolinas	Homeless service provider	Online Forum
Family Services of Davidson County	Homeless service provider	Online Forum
Fifth Street Ministries	Homeless service provider	Online Forum
Michigan Coalition Against Homelessness	Continuum of Care	Online Forum
North Carolina Coalition to End Homelessness	Continuum of Care	Online Forum
Outreach Mission	Homeless service provider	Online Forum
Partners Health Management	Homeless service provider	Online Forum
Alliance West	Homeless service provider	Online Forum
Northwest CoC	Continuum of Care	Online Forum
Orange County Partnership to End Homelessness	Continuum of Care	Online Forum
Spiritual Destiny International Ministries	Homeless service provider	Online Forum
Winston-Salem/Forsyth County CoC	Continuum of Care	Online Forum

City of Durham	Continuum of Care	Online Forum
Wake County	Continuum of Care	Online Forum
Guilford County CoC	Continuum of Care	Online Forum
City of New Bern	Local government	Online Forum
North Carolina Coalition Against Domestic Violence	Domestic violence service provider	Online Forum
Cape Fear Council of Government	Continuum of Care	Online Forum
United Way of Lincoln County	Homeless service provider	Online Forum
Sanford Housing Authority	Public housing agency	Online Forum
Department of Health and Human Services	Public agency	Online Forum
Onslow County	County government	Online Forum
Family Resource Center South Atlantic	Homeless service provider	Online Forum
Raleigh/Wake Partnership to End Homelessness	Continuum of Care	Online Forum
Kintegra Health	Homeless service provider	Online Forum
Brick Capital Community Development Corporation	Developer	Online Forum
Mecklenburg County	Continuum of Care	Online Forum
Wake County	Local government	Online Forum
City of Concord	Local government	Online Forum
City of Greensboro	Local government	Online Forum
City of Asheville	Local government	Online Forum
City of Raleigh	Local government	Online Forum
City of Greenville	Local government	Online Forum
City of Rocky Mount	Local government	Online Forum
Cumberland County	Local government	Online Forum
City of High Point	Local government	Online Forum
City of Wilmington	Local government	Online Forum
Orange County	Local government	Online Forum
City of Lenoir	Local government	Online Forum
Wilson Housing Authority	Public housing agency	Online Forum
Durham Housing Authority	Public housing agency	Online Forum
Greensboro Housing Authority	Public housing agency	Online Forum
Moore County	Public housing agency	Online Forum
Burlington Housing Authority	Public housing agency	Online Forum
North Carolina Commission for Indian Affairs	Public housing agency	Online Forum
Monroe Housing Authority	Public housing agency	Online Forum
Eastern Carolina Human Services Agency	Public housing agency	Online Forum
Washington Housing Authority	Public housing agency	Online Forum
Piedmont Triad Regional Council	Public housing agency	Online Forum
Washington Housing Authority	Public housing agency	Survey

Statesville Housing Authority	Public housing agency	Survey
Burlington Housing Authority	Public housing agency	Survey
Wilson Housing Authority	Public housing agency	Survey
Sandhills Community Action Program, Inc.	Public housing agency	Survey
Beaufort County United Way	Homeless service provider	Survey
Center for Homeownership & Economic Development Corporation	Homeless service provider	Survey
Cleveland County Abuse Prevention Council	Domestic violence service provider	Survey
Catawba Valley Healthcare	Healthcare providers	Survey
Gaston County Schools	Educational Institutions	Survey
Alexander County Schools	Education Institutions	Survey
Shelter Task Force	Homeless service provider	Survey
Dulatown Outreach Center	Homeless service provider	Survey
Foothills Regional Commission	Council of Governments	Survey
The Greater Mount Air Ministries of Hospitality	Homeless service provider	Survey
Displaced Roses	Homeless service provider	Survey
Hope in the End	Homeless service provider	Survey
The Bridge Community, Inc.	Homeless service provider	Survey
New Hope Homelessness and Poverty Ministry	Homeless service provider	Survey
Exodus Homes	Homeless service provider	Survey
Greater Hickory Cooperative Christian Ministry	Homeless service provider	Survey
Diakonons Inc.	Domestic violence service provider	Survey
Alliance Health	Healthcare providers	Survey
City of Gastonia	Local government	Survey
United Way of Lincoln County	Homeless service provider	Survey
Gaston County DHHS	Other public agency	Survey
Family Promise of Davie County	Homeless service provider	Survey
Carolina Caring	Healthcare providers	Survey
Surry Homeless and Affordable Housing Group	Homeless service providers	Survey
Lincoln County Coalition Against Domestic Violence	Domestic violence service provider	Survey
Cleveland County Rescue Mission	Homeless service provider	Survey
Hope United	Domestic violence service provider	Survey
Supportive Housing Communities	Homeless service providers	Survey
Pasquotank County Realtor	Other	Survey
Good Sheppard Center	Homeless service provider	Survey

Good Shepherd Center	Homeless service provider	Survey
Mountain Housing Opportunities	Developer	Survey
Friendship Community Development Corporation	Homeless service provider; Developer	Survey
CASA	Developer	Survey
North Carolina Coalition to End Homelessness	Continuum of Care	Survey
Halcon Development, LLC	Developer	Survey
Mt. Airy Men's Shelter	Homeless service provider	Survey
Thrive	Homeless service provider	Survey
River City Community Development Corporation	Homeless service provider; Continuum of Care	Survey
McDowell Mission Ministries (Rapid Rehousing)	Homeless service provider; Continuum of Care	Survey
Onslow Community Outreach	Homeless service provider	Survey
Lumberton Christian Care Center	Homeless service provider	Survey
Safe Space, Inc	Domestic violence service provider	Survey
United Way of Forsyth County, Inc.	Continuum of Care	Survey
Family Care Center of Catawba Valley, Inc.	Homeless service provider	Survey
Spiritual Destiny International Ministries, Inc	Org - fair housing, civil rights, persons with disabilities; veterans' group	Survey
Western Piedmont Regional Housing Authority	Public housing agency	Survey
Piedmont Triad Regional Council	Public housing agency; regional government	Survey
Reinvestment Partners	Homeless service provider	Survey
Disability Rights NC	Org - fair housing, civil rights, persons with disabilities	Survey
Sunrise for Recovery and Wellness	Resident; Homeless service provider	Survey
Alliance of Disability Advocates	Org - fair housing, civil rights, persons with disabilities	Survey
Crisis Ministry of Davidson County	Homeless and domestic violence service provider	Survey
Family Care Center of Catawba Valley, Inc.	Homeless service provider	Survey
Socialserve	Org - other	Survey
Durham People's Alliance Housing Action Team.	Org - other	Survey
Town of Waynesville Taskforce on Homelessness	Other public agency	Survey
Ashe County Project on Aging	Other public agency	Survey
North Carolina Coalition to End Homelessness	Homeless service provider	Survey

Sanford Housing Authority and Central Carolina Strategic Developers	Public housing agency	Survey
Gang Free Inc	Homeless service provider	Survey
Hope House Foundation	Homeless or domestic violence service provider	Survey
NC-506 Continuum of Care	Continuum of Care	Survey
NC-509 Continuum of Care	Continuum of Care	Survey
Veteran Services of the Carolinas	Veterans' group	Virtual Meeting
NC Emergency Solutions Grant   DHHS	Other public agency	Virtual Meeting
NC Human Relations Commission	Other public agency	Online Forum
The Arc of North Carolina	Org - fair housing, civil rights, persons with disabilities	Online Forum
Alliance of Disability Advocates	Org - fair housing, civil rights, persons with disabilities	Online Forum
Disability Rights, NC	Org - fair housing, civil rights, persons with disabilities	Online Forum
NCDHHS	Org - fair housing, civil rights, persons with disabilities	Online Forum
Disability Rights, NC	Org - fair housing, civil rights, persons with disabilities	Online Forum
NC Human Rights Relation (NCHRC)	Other public agency	Online Forum
Charlotte Center for Legal Advocacy	Org - fair housing, civil rights, persons with disabilities	Online Forum
NC Office for Recovery and Resiliency	Other public agency	Online Forum