



North Carolina Balance of State Continuum of Care

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919.755.4393

www.ncceh.org/BoS

Fair Housing Policy

Overview

After years of housing-related discrimination and segregation, fair housing laws (Title VIII of the Civil Rights Act of 1968; 1988 Fair Housing Amendments Act; Title II of the Americans with Disabilities Act of 1990; Violence Against Women Act of 1994, North Carolina's State Fair Housing Act) prohibit discrimination against people in protected groups when engaging in housing-related activities including the sale, rent, and financing of most housing units. These groups include race, color, national origin, religion, sex¹, familial status, dv victim status, and disability.

Agencies providing programs and services within the NC BoS CoC that work with people experiencing or at-risk of homelessness including street outreach, emergency shelter, rapid rehousing, permanent supportive housing programs, coordinated entry, property owners and management companies, public housing authorities, and other human service programs helping people experiencing or at risk of homelessness secure permanent housing must adhere to the Fair Housing Act by:

- 1) Prohibiting housing and housing-related discrimination, in the outreach of potential program participants, referral of program participants to housing, and enrollment of individuals and families in housing programs, including meeting modest accessibility requirements for those with disabilities and ensuring people are housed in the most integrated settings within the NC BoS CoC; and
- 2) Promoting fair housing.

Any program that provides housing or housing-related services must make serious efforts to find housing throughout the entire community to ensure people have choices not only in housing units themselves but also in the geographic areas in which they want to live.

The NC BoS CoC expects housing providers to post a Fair Housing Public Notice visible to all: staff and clients. The U.S. Department of Housing and Urban Development (HUD) is responsible for enforcement of compliance with the Fair Housing Act. A sample Fair Housing public notice is provided in Appendix A. Please note, the NC Human Relations Commission is responsible for the enforcement of the State Fair Housing Act.

Affirmative Marketing and Outreach

All housing providers must develop affirmative marketing and outreach strategies to ensure that all individuals and families eligible for their programs are provided a similar range of housing choices in various geographic areas regardless of race, color, national origin, religion, sex (including actual or perceived gender identity and sexual orientation), familial status, and disability. Affirmative Marketing and Outreach strategies should align with the local participating jurisdictions or the state of North Carolina's Consolidated Plan.

¹ The United States Supreme Court has also held that discrimination based on "sex" includes sexual orientation and gender identity in an employment discrimination case, and HUD previously issued rules and guidance including those traits as within the scope of "sex" discrimination.

Affirmative marketing steps consist of actions to provide information and otherwise attract eligible persons in the area to housing programs without regard to race, color, national origin, sex (including actual or perceived gender identity and sexual orientation), religion, familial status, or disability who are least likely to apply without targeted outreach. Housing providers must maintain records of their marketing activities.

The affirmative marketing and outreach strategies must include:

- 1) Methods for informing the public, property owners, and potential program participants about Federal fair housing laws and the participating jurisdiction's affirmative marketing policy (e.g., the use of the Equal Housing Opportunity logo or slogan in press releases and solicitations for owners, and written communication);
- 2) Adherence to requirements and practices of the participating jurisdiction's affirmative marketing procedures and requirements (e.g., use of commercial media, use of community contacts, use of the Equal Housing Opportunity logo, and display of a Fair Housing poster);
- 3) Procedures to be used to inform and solicit applications from persons in the area who are least likely to apply for the housing program or the housing provided without special outreach (e.g., through the use of community organizations, places of worship, employment centers, Fair Housing groups, or housing counseling agencies);
- 4) A description of how the participating jurisdiction will assess, at least annually, the success of affirmative marketing actions and what corrective actions will be taken where affirmative marketing requirements are not met.

More specific strategies can include:

- Outreach through community contacts or service providers
- Outreach at community centers serving the target population
- Marketing on websites, social media channels, television, radio, and print media serving local members of the targeted population

Record Keeping:

Housing providers must keep records labeled with the project's name describing their strategies and actions taken to affirmatively market the program and/or housing units along with records of the results of these strategies and actions. [Form HUD-935.2A](#) should be reviewed and Worksheets 1, 2, 3, and 4 should be completed for strategy development and implementation.

Actual strategies implemented should be recorded by project name and include advertisements, flyers, and other information used. All activities related to implementing the affirmative marketing and outreach plan should be documented. A sample log is provided in Appendix B.



Reasonable Accommodation

Housing providers must take steps to assist program participants in requesting reasonable accommodations that would allow persons with disabilities to fully access housing. For people with disabilities, it is illegal to fail to make reasonable accommodations in rules, policies, and services to allow a person with a disability equal opportunity to use and enjoy a housing unit. Reasonable accommodation could include changing the day rent is due to be in line with a renter's disability income received or allowing emotional support animals despite a no pets rule.

A Notice regarding Reasonable Accommodation is provided in Appendix C. A sample Reasonable Accommodation Request form is provided in Appendix D.

Reasonable Modification

Housing providers within the NC BoS CoC receiving Federal funding and participating in coordinated entry, must also take steps to assist program participants in requesting reasonable modifications that would allow persons with disabilities to fully access housing. It is illegal to fail to allow for reasonable physical modification of a rental unit that would give a person with a disability full access and use of a housing unit. Reasonable modifications could include making doorways wider to accommodate wheelchair access or adding grab bars in a bathroom.

A Notice regarding Reasonable Modification is provided in Appendix C. A sample Reasonable Modification Request form is provided in Appendix E.

Filing a Fair Housing Complaint

Housing providers within the NC BoS CoC receiving Federal funding and participating in coordinated entry, must provide information to program participants on how to [report Housing Discrimination](#).

Step 1: Housing discrimination must be reported to the U.S. Department of Housing and Urban Development. A report can be made in one of three ways:

1. Complete a [Housing Discrimination Report online](#);
2. Call 1-800-669-9777; or
3. [Print a Housing Discrimination Report form](#), complete it, and submit it via mail to your regional Fair Housing and Equal Opportunity (FHEO) office:

Mail: Atlanta Regional Office of FHEO
U.S. Department of Housing and Urban Development
77 Forsyth St SW
Atlanta, GA 80808

(800) 440-8091

Step 2: Inform the participating jurisdiction or consortium that a housing discrimination report has been submitted to HUD. Review the list of participating jurisdictions or consortia in the NC BoS CoC in Appendix F.

Step 3: Within 5 business days of filing a housing discrimination report in Step 1, inform the NC BoS CoC via this [Smartsheet Form](#).



Step 4: Complaints for Violations of the State Fair Housing Act should be directed to:

[NC Human Relations Commission:](#)

1711 New Hope Church Rd.
Raleigh, NC 27609
984-236-1850

At the time of this policy, there are no specifics on what type of assistance the NC Human Relations Commission can provide.

Resources for Assistance with Fair Housing Concerns:

Legal Services in North Carolina:

Legal services are available statewide for individuals who cannot afford to hire an attorney and who meet low-income guidelines based on family size.

Legal Aid of North Carolina has 20 offices across the state that can offer help with Fair Housing issues.

For more information, see the [Legal Aid of North Carolina website](#) at www.legalaidnc.org. They also can be reached via a toll-free Helpline at 1-866-219-5262. Legal Aid of North Carolina can provide legal representation in certain cases. They also have a [Fair Housing Project webpage](#).

For assistance with Fair Housing issues, contact the Fair Housing Project at:

[Fair Housing Project Legal Aid of North Carolina](#)

(855) 797-3247
info@fairhousingnc.org

Pisgah Legal Services:

Pisgah Legal Services is available in the Qualla Boundary and 14 Western North Carolina counties, covering all of Regions 1 and 2 and part of Region 3 in the NC BoS CoC. The counties include Cherokee, Clay, Graham, Macon, Swain, Jackson, Haywood, Madison, Transylvania, Henderson, Polk, Rutherford, McDowell, and Burke.

Pisgah Legal Services has offices in Brevard, Cashiers, Franklin, Hendersonville, Highlands, Marshall, Morganton, Rutherfordton, and Waynesville within the NC BoS CoC.

For more information, see [Pisgah Legal Services website](#) . They can also be reached at 1-800-489-6144



Appendix A: SAMPLE FAIR HOUSING PUBLIC NOTICE



EQUAL HOUSING OPPORTUNITY

We do Business in Accordance with the Fair Housing Act (The Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988)

IT IS ILLEGAL TO DISCRIMINATE AGAINST ANY PERSON BECAUSE OF RACE, COLOR, RELIGION, SEX, DISABILITY, FAMILIAL STATUS, OR NATIONAL ORIGIN

- In the sale or rental of housing or residential lots.
- In advertising the sale or rental of housing.
- In the financing of housing.
- In the appraisal of housing.
- In the provision of real estate brokerage services.

Anyone who believes they have been discriminated against should talk to one of our staff members to learn about ways to file a complaint and connect to local resources for legal assistance.

We will work with you to send a complaint to the U.S. Department of Housing and Urban Development.

You can also submit a complaint on your own to the U.S. Department of Housing and Urban Development. Call (404) 331-5140 for assistance.



Appendix B: Affirmative Marketing and Outreach Log

[illegible]

Appendix C: NOTICE OF RIGHT TO REASONABLE ACCOMMODATION AND/OR MODIFICATION IF YOU HAVE A DISABILITY

You have the right to reasonable accommodation and modification if you have a disability and any of the following changes would help you live here, use the facilities, or participate in programs on-site.

You can ask for reasonable accommodations for things like:

- A change in the rule or the way we do things
- A change in the way we communicate with you or give you information.

You can ask for reasonable modifications for things like:

- Repair or modification in your apartment, or a special type of apartment
- A change or repair to some other part of the buildings or grounds

We will give you an answer in _____ days, unless there is a problem getting the information we need or unless you agree to a longer time.

We will let you know if we need more information or verification from you or if we would like to talk with you about other ways to meet your needs.

If we turn down your request, we will explain the reasons.

You can give us more information if you think it will help us.

If you need help filling out the Reasonable Accommodation/Modification Request Form, or if you want to give us your request in some other way, we will help you do so.

You can get a Reasonable Accommodation/Modification Request Form _____.



Appendix D: SAMPLE REASONABLE ACCOMMODATION REQUEST FORM

REASONABLE ACCOMMODATION REQUEST FORM FOR TENANTS

Date: _____

Landlord/Property Management Company's Name: _____

Address: _____

Dear _____,

I live in Apt./Unit # _____ at _____.

I have a disability that prevents me from: _____.

I am therefore requesting a reasonable accommodation.

I have attached a verification from _____ of my disability and the functional limitation I experience as well as the accommodation(s) I need to compensate for my disability and fully use the housing unit.

I am asking for this accommodation so that I can have full use and enjoyment of my home.

Please reply to my request in writing within the next ten (10) business days.

If you have any questions about my request, please do not hesitate to contact me.

I look forward to your response and appreciate your attention to this matter.

Sincerely, _____ [signature]



Appendix E: SAMPLE REASONABLE MODIFICATION REQUEST FORM

REASONABLE MODIFICATION REQUEST

Date: _____

Landlord/Property Management Company's Name: _____

Address: _____

Dear _____,

I live in Apt./Unit # _____ at _____.

I have (or a member of my family living at this property with me has) a disability that prevents me/them from:
_____.

As an accommodation for my/their disabling condition, I request your permission
to _____,
at my expense.

I intend to hire _____ to do the work.

_____ is willing to discuss the project with you and discuss any concerns you may have.

If you wish, I can have any changes removed when I vacate my unit.

Please respond to my request for a reasonable modification in writing within ten (10) business days.

I look forward to your response and appreciate your attention to this matter.

Sincerely, _____



APPENDIX F: Participating Jurisdictions or Consortiums in the NC BoS CoC

Asheville

City of Asheville, Community & Economic Development Department, is the lead entity for the Asheville Regional Housing Consortium including Buncombe/Henderson/Transylvania/Madison Counties

Ashevillenc.gov

Nikki Reid

Community & Economic Development Department Director

City of Asheville

PO Box 1748 Asheville, NC 28802

(828)-259-5729

nreid@ashevillenc.gov

Burlington

City of Burlington, Planning Department Community Development Division

<https://www.burlingtonnc.gov/1210/Fair-Housing>

Sonyé Randolph, Community Development Administrator

City of Burlington

PO Box 1358

Burlington, NC 27216

336-222-5094

srandolph@burlingtonnc.gov

Choanoke Areas Housing Consortium – Bertie, Halifax, Hertford, Martin, and Northampton Counties

Halifax County – Lead Entity

www.halifaxnc.com

Christina Wells Deputy County Manager

Halifax County

10 N. King Street

Halifax, NC 27839

252-583-1131

wellsc@halifaxnc.com

Concord

City of Concord is the lead entity for the Cabarrus/Iredell/Rowan HOME Consortium, including Kannapolis

www.concordnc.gov

Pepper Bego

Federal Programs Coordinator

Planning & Neighborhood Development Department

City of Concord, NC

35 Cabarrus Avenue West

Concord, NC 28025

Office: 704-920-5133

begop@concordnc.gov



Foothills NC HOME Consortium - Cleveland County, Kings Mountain, Shelby, McDowell County, Marion, Old Fort, Polk County, Saluda, Rutherford County, Forest City, Rutherfordton, and Spindale.
McDowell County serves as the lead agency.

[Foothills Community & Economic Development](#)

Penny Martinez, Housing Planner
828-289-5672 Ext. 244
pmartinez@foothillsregion.org

Goldsboro

City of Goldsboro, Community Relations Department
www.goldsboronc.gov/community-relations/div

April Choice
Community Relations and Development Director
City of Goldsboro
214 N. Center Street
Goldsboro, NC 27530
919-580-4360 achoice@goldsboronc.gov

Greenville

City of Greenville, Planning & Development Services/Housing Division
[City of Greenville](#)

Tiana Berryman
Director of Neighborhood and Business Services
200 West Fifth Street
Greenville, NC 27858
252-329-4518
tberryman@greenvillenc.gov

Hickory

City of Hickory, Office of Business Development
[City of Hickory](#)

Dave Leonetti
Business and Community Development Manager
City of Hickory
76 N Center St.
Hickory, NC 28601
828-323-7422
dleonetti@hickorync.gov

Jacksonville

City of Jacksonville, Neighborhood Improvement Services

Tracy Jackson, Community Engagement Manager
PO Box 128
Jacksonville, NC 28541-0128



Phone: 910-938-5269
tjackson@jacksonvillenc.gov
www.jacksonvillenc.gov

Morganton

Western Piedmont Council of Governments is responsible for the Consolidated Plan. The City of Morganton is part of the Unifor Consortium, which includes, the City of Lenoir (Lead), City of Hickory, and City of Morganton.

Western Piedmont Council of Governments
PO Box 9026
Hickory, NC 28603

1880 2nd Avenue NW
Hickory, NC 28601
828-322-9191
Wpcog.org

City of Morganton
<https://www.morgantonnc.gov/development-design-services/page/fair-housing-notice>
PO Box 3448
Morganton, NC 28680
Morgantonnc.gov

Mooreville

Town of Mooreville, Planning and Community Development Department
[Mooreville Planning & Community Development](#)

Planning & Community Development Office
750 W. Iredell Avenue
Mooreville, NC 28115
704-662-7040

New Bern

City of New Bern

Ms. D'Aja Fulore
Community Development Coordinator
City of New Bern's Development Services Department
Economic and Community Development Office
303 First Street, PO Box 1129
New Bern, NC 28563
252-639-7586
fulmored@newbernnc.gov
www.newbernnc.gov

North Carolina

The NC Commerce serves at the lead agency for the Consolidated Planning process for NC
commerce.nc.gov

Valerie D. Moore Fegans
Rural Economic Development Division



NC Commerce
301 North Wilmington Street, 4th Floor
4346 Mail Service Center
Raleigh, NC 27699-4346
919-814-4673
Valerie.fegans@commerce.nc.gov

Rocky Mount The City of Rocky Mount serves as the lead entity for the Down East HOME Consortium (DEHC), consists of Conetoe, Edgecombe County, Middlesex, Pinetops, Princeville, Rocky Mount, Sharpsburg, Spring Hope, and Whitakers.

Rockymountnc.gov

Cornelia L. McGee
Director of Community Development
City of Rocky Mount
Community and Business Development Department
PO Box 1180
Rocky Mount, NC 27802-1180
252-972-1100
To email Cornelia McGee click [here](#)

Southwestern NC HOME Consortium - Towns of Maggie Valley, Town of Clyde, Town of Canton, Town of Waynesville, Clay County, Town of Hayesville, Graham County, Town of Fontana Dam, Town of Robbinsville, Jackson County, Town of Dillsboro, Town of Sylva, Town of Webster, Macon County, Town of Franklin, Town of Highlands, Swain County and Town of Bryson City
Haywood County is the lead entity

Becca Scott
Director of Community & Economic Development
Southwestern NC Commission
125 Bonnie Lane
Sylva, NC 28779
828-586-1962 ext. 219
Becca@regiona.org
[Southwestern Commission Council of Governments](#)

Surry County

Surry County serves as the lead entity for the Surry County Housing Consortium of Surry, Stokes, Yadkin, and Davie Counties.

[Piedmont Triad Regional Council Community Development Department](#)

Drew Corbett
Community Development Supervisor
1398 Carrollton Crossing Dr.
Kernersville, NC 27284
336-904-0300

To email Drew Corbett, click [here](#) and scroll down to Our Staff.

Union County

County Manager's Office is the lead entity.



Unioncountync.gov

Mr. Clayton Voignier
Assistant County Manager
Union County
500 North Main Street
Monroe, NC 28112
704-283-3687

Clayton.voignier@unioncountync.gov

