

North Carolina Balance of State Continuum of Care

Fair Housing Policy Webinar
December 16, 2025
9 AM



NCCEH

Welcome

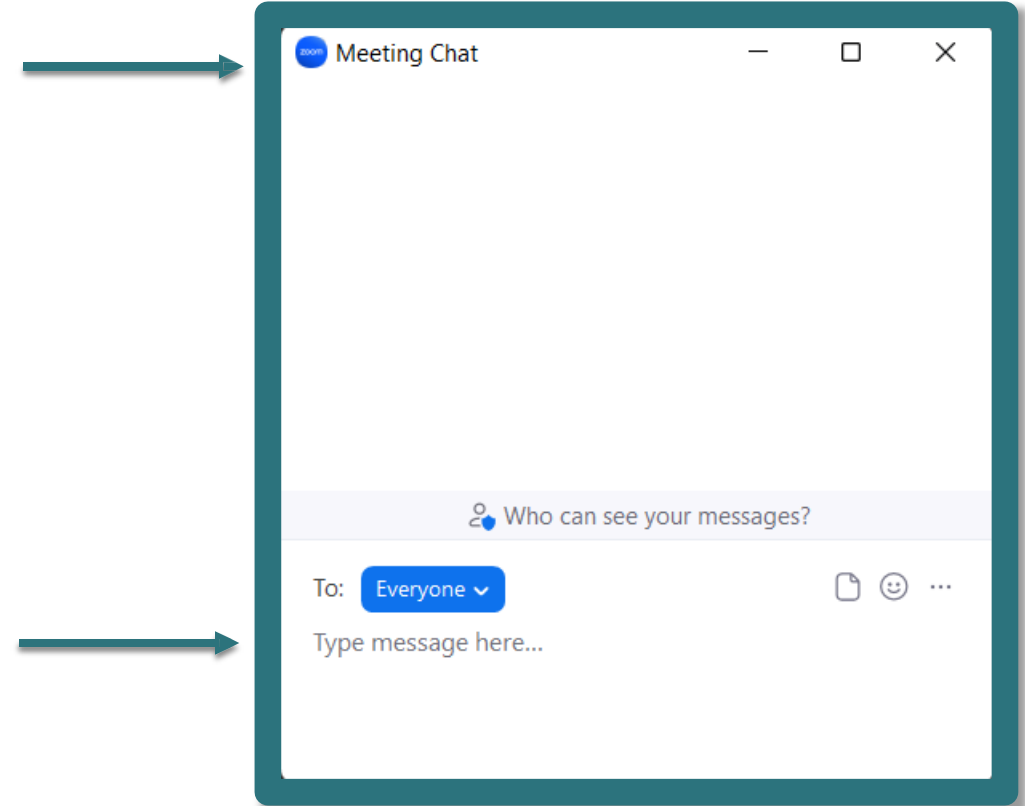
Reminders:

We are recording today's webinar.

Your line is muted.

We will unmute the line during Q&A pauses.

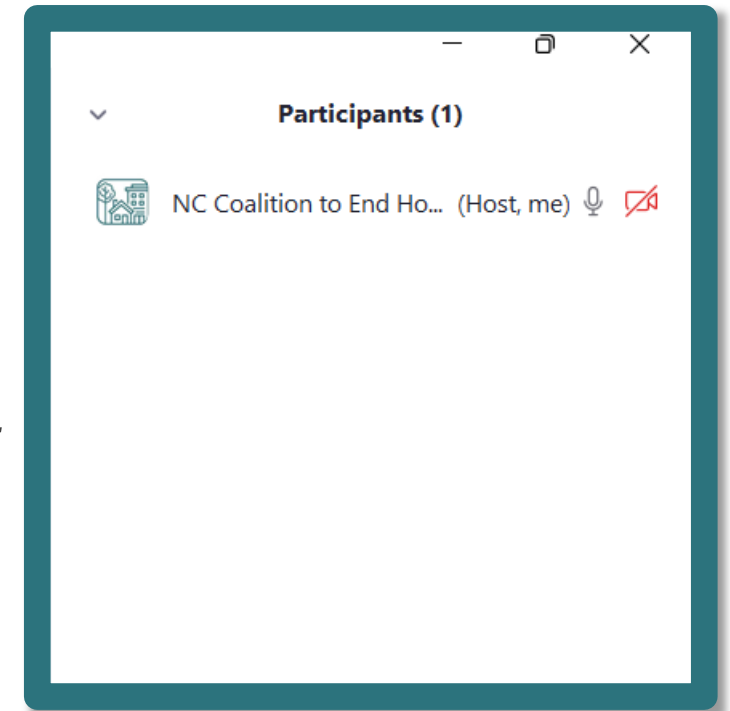
The chat box is available to use anytime.



Training Logistics

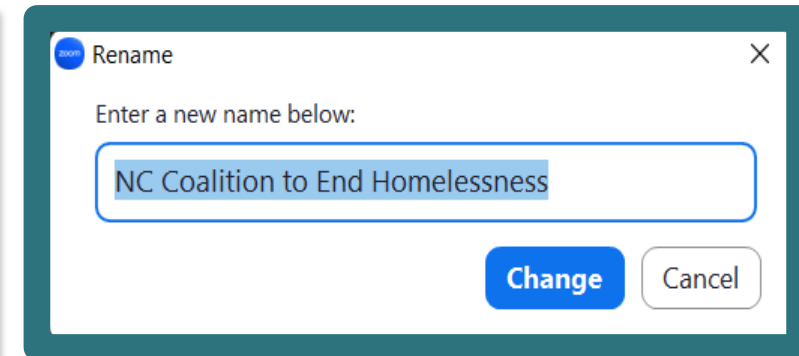
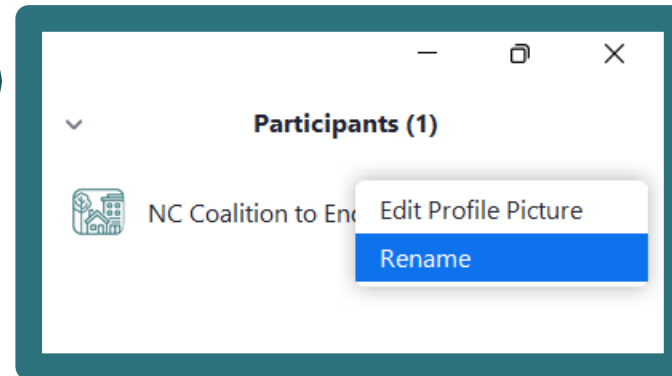
- We will not conduct Roll Call for attendees.
- All participants should enter their names & organizations in the chat so we can see who all is here.

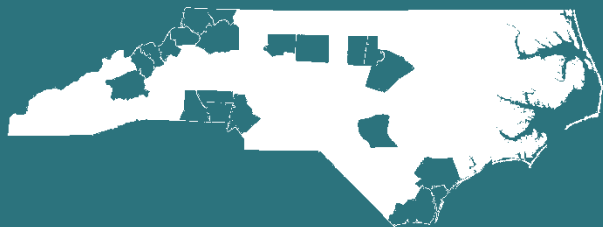
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How to change your screen name:

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Agenda

- Fair Housing Policy Overview
- Affirmative Marketing & Outreach
- Reasonable Accommodation & Reasonable Modification Requests
- Filing Fair Housing Complaints
- Written Standards
- Resources & Next Steps





Fair Housing Policy Overview

US Fair Housing laws

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*):

- Prohibits discrimination in housing against people according to:
 - Race
 - Color
 - National origin
 - Religion
 - Sex (still including gender identity & sexual orientation)
 - Familial status
 - Disability
 - Domestic violence victim status
- Applies to 3 housing-related areas:
 - Sale of housing
 - Rental of housing
 - Financing housing

Why does the CoC have a Fair Housing Policy?

HUD requires all CoCs to Affirmatively Further Fair Housing (AFFH) in compliance with the U.S. Fair Housing Act & its regulations.

- Promote fair housing choice
- Eliminate disparities in housing
- Foster inclusive communities

Under the FY2024 CoC Program Notice Of Funding Opportunity, HUD highlighted new AFFH responsibilities for CoCs (specifically CE systems) that we addressed for the first time in the CoC Application in the FY2024 CoC Program competition.

The CoC chose to implement a new Fair Housing Policy in 2024 & updated the CoC's written standards to address these requirements to help CoC stakeholders understand their responsibilities.



To whom does the CoC's Fair Housing Policy apply?

The CoC's Fair Housing Policy applies to all programs that work with people experiencing or at-risk of homelessness to secure & maintain permanent housing.

These programs include:

- Street outreach
- Emergency shelters
- Transitional housing
- Homelessness prevention
- Rapid rehousing
- Permanent supportive housing
- Coordinated entry
- Public housing authorities
- Other human service programs working on housing-related issues

What does the CoC's Fair Housing Policy address & include?

The Fair Housing Policy:

- Provides an overview of the U.S. Fair Housing Act, defining the protected classes.
- Defines & outlines affirmative marketing & outreach
- Outlines record-keeping requirements
- Includes information on reasonable accommodation & reasonable modification requests
- Includes steps programs must take when participants face a potential Fair Housing violation
- Contains contact information for participating jurisdictions, legal services, & CoC staff to whom programs should refer or report
- Includes sample notices, logs, and forms





Affirmative Marketing & Outreach

CoC stakeholders should ensure that people have choices in the types & places they want to live.

Affirmatively marketing & outreach allows providers helping people experiencing homelessness to find the types of housing & the locations in which they want to live.

- Attract eligible participants that would not otherwise know about or be least likely to apply
- Engage participants in finding housing, presenting them with options in a variety of locations that meet their needs
- Engage property providers & other community stakeholders, educating them on the services the program provides & Fair Housing laws that often prevent people experiencing homelessness from accessing permanent housing

What does this mean for you as a provider?

Most programs are likely already meeting the basic requirements of Affirmative Marketing & Outreach.

- The policy formalizes these activities & requires broader understanding of Fair Housing activities.
- Under the policy, agency leadership & program staff should:
 - Understand the Affirmative Marketing & Outreach plan in their participating jurisdiction & ensure current & future activities adhere to the Consolidated Plan
 - Actively engage populations least likely to ask for help with housing & create an outreach plan to ensure protected populations are accessing housing services
 - Actively engage the community & property providers & advocate for equitable access to permanent housing resources
 - Post the Fair Housing Notice in intake areas of facilities &/or have copies to provide to enrolled participants so they understand their rights & how to access help when faced with a Fair Housing violation
 - Use the agency website, social media accounts, & other media opportunities to engage people least likely to ask for help & community members to understand their rights & obligations under Fair Housing
 - Log all Affirmative Marketing & Outreach Strategies that can be shared with participating jurisdictions & the CoC during Consolidated Plan update planning



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.
- Blockbusting is also illegal.

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

Project Name:		
DATE	ACTIVITY	Notes/Comments



Reasonable Accommodation & Reasonable Modification Requests

Programs should help participants request Reasonable Accommodations & Reasonable Modifications.

Program staff who work with people with disabilities should help participants request Reasonable Accommodations & Reasonable Modifications, as needed, from property providers.

- Under the Fair Housing Act, all property providers must accept requests for Reasonable Accommodation & Reasonable Modifications. However, these requests can be denied if they are not reasonable by imposing an undue financial or administrative burden or alter the nature of the housing program. Decisions should be uniform across all people accessing units the property provider manages.
- Reasonable Accommodation requests focus on a change in rules, policies, & services that will give the participant access to housing.
- Reasonable Modification requests focus on changes to facilities that would modify the physical structure of the unit/housing to accommodate a disability.
- The Fair Housing Policy includes sample request forms & a notice of rights to share with participants.



Filing Fair Housing Complaints

Program staff should have a basic understanding of Fair Housing.

Program staff should have an adequate understanding when Fair Housing laws may have been violated by property providers.

- Provide training to new staff and ongoing, annual training for seasoned staff
- Document/log training opportunities and staff attendance

Program staff should help participants file a Fair Housing complaint & connect them to resources.

Staff should inform all participants of their rights to fair housing at intake.

- Post or share the Fair Housing Public Notice (Appendix A)

Staff should talk with participants about their rights when they suspect property providers have violated Fair Housing & encourage them to file a complaint, as appropriate.

- Filing a complaint is up to the participant
- When complaints are not filed, programs should still record the incident & act as a mediator with the property provider on behalf of the participant when desired
- Offer to connect them to other resources, including free legal resources, to discuss their options
 - Legal Aid of North Carolina
 - Pisgah Legal Services (serves counties in Western North Carolina)

Examples of Fair Housing violations.

Examples of violations:

- Denying shelter based on race
- Steering clients to be housed in specific neighborhoods based on race
- Refusing requests for reasonable accommodations



Three steps in filing a Fair Housing complaint.

When participants agree to file a Fair Housing complaint, programs have three steps to take under the CoC's Fair Housing Policy.

- Step 1: Assist the participant to formally file the complaint with the Department of Housing & Urban Development
- Step 2: Report the submission of a Fair Housing complaint to the Participating Jurisdiction
- Step 3: Report the submission of a Fair Housing complaint to the CoC through a Smartsheet form within 5 business days
 - CoC's Fair Housing Complaint Notification:
<https://app.smartsheet.com/b/form/53bd6bcc72684ea997a4b3e7bb6bc85d>

The background of the image is a solid teal color, overlaid with a repeating pattern of white line-art icons. These icons represent various types of buildings, including houses, multi-story apartment or office buildings, and industrial structures like factories with smokestacks. Interspersed among the buildings are stylized trees, some with multiple trunks and others as single pointed shapes. The pattern is dense and covers the entire background.

Written Standards

Written Standards for All Project Types & Fair Housing Policy

Programs, as part of their work to assist households access permanent housing resources, will support households who may be working with housing providers who have violated Federal, state, and/or local Fair Housing laws.

Benchmarks:

- Understand and implement the NC Balance of State CoC's Fair Housing Policy.
- Make available the Fair Housing Public Notice (see Appendix A of the CoC's Fair Housing Policy) when applicable during housing conversations and goal planning.
- Assist households who may need to ask for a reasonable accommodation or a reasonable modification to fully access available housing units.

Written Standards for All Project Types & Fair Housing Policy

- Assist households to locate and choose permanent housing based on their needs and desires, ensuring they have a range of choices in various geographic areas regardless of race, color, national origin, religion, sex (including gender identity and sexual orientation), familial status, and disability.
- Provide information to households who believe a housing provider has violated Federal, state, and/or local Fair Housing laws on how to connect to legal resources and file a complaint. See the CoC Fair Housing Policy for information on how to file a complaint.

Written Standards for All Project Types & Fair Housing Policy

- Inform the local or state participating jurisdiction or consortium that a housing complaint has been filed with HUD. See the CoC Fair Housing Policy for information on how to find the participating jurisdiction or consortium.
- Submit pertinent household information to NCCEH within 5 business days of filing a housing complaint. See the CoC Fair Housing Policy for information on how to submit information to the CoC.

Coordinated Entry & Fair Housing Policy

In addition to all of the previously bulleted items found in all project type Written Standards, the NC BoS CoC's Coordinated Entry Written Standards includes the piece about marketing and outreach:

- Develop affirmative marketing and outreach strategies to ensure that all households eligible for permanent housing 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. Programs should ensure that Affirmative Marketing and Outreach strategies align with the local or state participating jurisdiction Consolidated Plan. Programs should record their strategies and actions taken to affirmatively market the program and/or housing units using the sample log in Appendix B of the CoC's Fair Housing Policy.



Resources & Next Steps

Resources

The [CoC's Fair Housing Policy](#)

Written Standards updates are posted at: <https://ncceh.org/nc-bos-coc-overview/>

[North Carolina Housing Finance Agency's Reasonable Accommodation Guide](#)

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

Disability Rights of North Carolina: [Fair Housing, Reasonable Accommodations & Modifications in Housing](#)

NC Human Relations Commission: [State of NC Fair Housing Act](#)

Next steps

Steps to take to become compliant with the CoC's Fair Housing Policy:

- Review Fair Housing Information to better understand the federal Fair Housing Act, potential violations, & examples
- Read & understand your agency's obligations under the CoC's Fair Housing Policy
- Integrate the Fair Housing Policy into your own agency's program policies and procedures.
- Train all program staff on the policy
- Discuss, plan, & implement an Affirmative Marketing & Outreach strategy & record strategies & ongoing activities
- Post the Fair Housing Notice in facilities & make copies to provide to participants when interacting outside of program offices
- Update websites to include information on Fair Housing
- Reach out to CoC staff with questions

Thank you!

Reach out to us if you have any questions or need help implementing this Fair Housing Policy in your agency:

(919) 755-4393

bos@ncceh.org

