Affordable Housing for American Indian Tribes

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Executive Summary:

The United States of America has a well-documented history of white Supremacy and discrimination which continues to result in disparate outcomes for marginalized populations. But, during discussions that revolve around the dismantling of oppressive systems, advocates and academics alike often forget about American Indians. In North Carolina, which has the largest American Indian population East of the Mississippi River, it is imperative their issues are considered and addressed.

This report focuses on affordable housing in particular and begins to contextualize and address the numerous burdens associated with its inaccessibility. To do so, demographic and economic data, relevant policies and programs, and interviews with tribal leaders and housing experts are analyzed.

Due to the breadth of the topic and the client’s (The North Carolina Commission of Indian Affairs) desires to narrow focus, analysis was conducted for Halifax, Robeson, Sampson, and Swain Counties exclusively. These Counties constitute over half of North Carolina’s American Indian population and serve as the cultural centers for the state’s four largest tribes, one of which is the only tribe in the state with federal recognition.

As expected, American Indians have worse outcomes on almost every measurable social & economic data point in comparison to other identity groups, are disproportionately impacted by budget cuts and policy changes, and experience unique sets of issues associated with their predominant rural residency. American Indians in Swain County, home of the federally recognized Eastern Band of Cherokee, have disparate outcomes as well. But the Cherokee have also experienced vast improvements in comparison to other tribes and the state of North Carolina as a whole. This is likely attributed to the additional funding received due to their federally recognized status. Increased funding on improving local housing stocks is one of the many drivers for these observable differences. Improved housing quality is strongly correlated with better overall life chances.

There are opportunities to invest in tiny homes, mobile home upgrades, and “Baby Bonds” to spark housing and economic improvement for all of North Carolina’s American Indians. But the affordable housing crisis cannot be solved through philanthropic and privately funded ventures alone, which is how most of the recommendations above are financed. Individuals and entities with a vested interest in improving the conditions of marginalized populations must continue their advocacy efforts and arm themselves with the information and data clearly illustrating the negative outcomes of American Indians. They must pressure state and federal lawmakers to stop the “status quo” of cutting or eliminating housing programs and erecting barriers to housing access. The Eastern Band of Cherokee Indians can be used as an example to illustrate the importance of adequate funding and programming. Their varying outcomes show its positive impacts, in this case via tribal recognition, on economic indicators such as housing.
1. Policy Question

How can the North Carolina Commission of Indian Affairs support in providing affordable housing for American Indians in non-metropolitan communities?

2. Issue Background

The North Carolina Commission of Indian Affairs addresses the concerns of North Carolina’s American Indian Tribes. Currently, the largest concern is the severe housing crisis within Indian communities. This issue is two-fold; housing stocks are declining, and affordability of remaining units is decreasing.

The Commission stated available homes in some communities are dilapidated beyond the point of repair and, subsequently, condemned, thereby leaving tenants without shelter. The housing stock is reduced as a result, and private developers are not interested in building new units to offset the reductions because profitability is limited. In other communities, out-of-state & third-party developers are purchasing single and double-wide lots. After purchase, developers raise the lot rents for mobile homeowners, who constitute a significant percentage of all homeowners in counties with large American Indian populations (Grigsby & Richardson, 2019).

The Commission, which was designated as a Public Housing Agency by HUD in 1976, has the authority to provide Section 8 Housing Vouchers to residents of select Counties with large American Indian populations. This includes Columbus, Granville, Halifax, Hoke, Person, Sampson, and Warren (NCCIA, 2020). But decreasing inventory and rising costs hinder the Commission’s ability to properly assist these residents.

In Robeson, Scotland, and Bladen Counties, as well as within the Qualla Boundary, the tribal land trust for the Eastern Band of Cherokee Indians located in Western North Carolina, the issues of affordability and accessibility are equally important. While the Commission serves these regions as well, it is not authorized to provide housing vouchers to residents which exacerbates the severity of the crisis (Grigsby & Richardson, 2019).

The issue of affordable housing affects many, but the disparate impacts it has upon American Indians receives scant attention. For North Carolina, which has the fifth largest
American Indian population in the United States and the largest East of the Mississippi River (U.S. Census Bureau, 2018a), it is imperative that American Indian issues are considered and contextualized during discussions of housing policy.

3. Survey of Policy Landscape & Literature

Affordable Housing’s General Shortcomings

Rising costs and racially motivated political interests transformed the structure of affordable housing provision during the late 20th century (Nguyen et al, 2012 & Menendian, 2017). Although once heavily involved in providing affordable housing, the federal government began deflecting responsibility during the Nixon Administration. For example, Section 8 introduced a “hybrid” public-private partnership model which allows individuals to rent units in privately owned housing developments with subsidized vouchers (Nguyen et al, 2012). The Community Development Block Grant (CDBG) “decentralized” affordable housing by giving states the autonomy to fund projects that meet their specific needs (HUD, 2020a). While the shift towards “hybridity” and “decentralization” has some economic benefits, this structure is flawed.

First, private developers and management companies are interested in maintaining their reputation. To do so, these companies have stringent selection processes and low tolerance for “undesirable” behavior. For example, during the screening process, renters may be subject to criminal background checks and required to sign affidavits stating children occupying their unit have not committed a crime (Nguyen et al, 2012). Developers who attempt to uphold their image with restrictive policies shut out those with the greatest need, such as cost-burdened renters with prior involvement in the justice system.

Second, investment has not coincided with increases in the federal budget. There has not been major investment in affordable housing since the 1970s (NLIHC, 2015). In addition, most federal housing expenditures are used to support homeownership instead of rental housing. In the United States, only a quarter of individuals eligible for some form of housing assistance receive it due to underinvestment (NLIHC, 2015). In North Carolina, there is a deficit of 200,000 affordable rental units for eligible individuals (NLIHC, 2017). Also, for every affordable
housing unit created, two are “lost” as a result of deterioration or private developers exiting the affordable housing market (NLIHC, 2015).

Third, underinvestment reduces the effectiveness of assistance for those who are able to access it. In Indian Communities, such as Harnett, Scotland, and Hertford Counties, the difference between Fair Market Rent (FMR), or Section 8, voucher allowances and Median Housing Costs in these respective counties well exceeds $100 for certain units, such as a 1-Bedroom apartment (HUD PDR, 2018 & U.S. Census Bureau, 2018a). If rents of available units are equal to or greater than the median, recipients must make up the difference, $100 or more, and pay for additional housing-related expenses. Lastly, Section 8 applicants receive differing voucher allowances based on their income which may further increase financial burdens.

Fourth, the grant-based funding structure of many federal affordable housing programs creates inefficiencies. Specific funding amounts are appropriated and change year-to-year; in some instances, funding may be eliminated altogether (NLIHC, 2015). On the contrary, some state and local programs rely on market revenues which may result in developments being used for non-housing purposes (NLIHC, 2015). The volatility of funding prevents effective change and assistance.

Lastly, racial stereotypes hinder affordable housing implementation. Empirical evidence indicates the primary factor of NIMBYism, or “Not in My Back Yard”, is due to concerns over the types of people perceived to live in affordable housing developments (Tighe, 2012). Severe opposition from interest groups and neighborhood residents exclude people of color. NIMBYism not only prevents affordable housing expansion, but it could be considered a form of racial discrimination as well which violates the Civil Rights and Fair Housing Act (Tighe, 2012).

**Rural-Specific Housing Issues**

Depending on the metric used, each county that the Commission of Indian Affairs serves is considered rural. According to the Census Bureau, all counties, with the exception of Hoke and Scotland, are completely or mostly rural (U.S. Census Bureau, 2010b). The North Carolina Rural Center considers all of the Commission’s constituent counties rural (NC Rural Center,
Because of these classifications, it is important to contextualize the unique issues that exist in rural communities and further exacerbate the affordable housing crisis.

To begin, rural renters have less income in comparison to urban renters. Even if their housing expenditures are equal, rural residents have less disposable income for other expenses. For example, without access to public transit, a large portion of rural residents’ monthly budgets are dedicated to adequate transportation (Dumont, 2018). According to HUD’s Location Affordability Index, medium-income rural residents spend 30% of their budget on transportation, 10 percentage points higher than medium-income urban residents (Dumont, 2018). These differences are more pronounced for low-income renters.

Consumer preferences are also straining the stock of available housing. After the Great Recession, 66% of individuals who experienced foreclosure stayed within their respective county. 80% were more likely to become renters. Homeownership for young adults also decreased (Dumont, 2018). As a result, the percentage of rural renters in the United States increased from 31% to 35% from 2004 to 2012 (Ziebrath, 2015). While it was only a four-percentage point increase, the rural housing stock has not increased to meet demand.

Rural rents are typically half of what can be charged in urban areas; developers in pursuit of profit are disinterested in building rural properties (Ziebrath, 2015). For context, Robeson County, home of the Lumbee tribe, only authorized 182 building permits for new housing units in 2019 (U.S. Census Bureau, 2019). It is important to note the number of permits tracked includes all privately owned residential housing, which may or may not include affordable housing developments. But 168 of those permits were for single unit detached structures (i.e. “traditional” homes, mobile homes) which are intended to accommodate single families and single individuals (U.S. Census Bureau, 2019). Overall, this is a minute increase when compared to the 53,000 housing units that already exist in Robeson county, a majority of which are single unit detached structures as well (U.S. Census Bureau, 2018a). Using this data, Robeson County’s annual housing growth rate is less than a tenth of a percent. For context, the Raleigh MSA has an annual growth rate of 2.3 percent (HUD, 2019).

Robeson County is not alone; most housing in rural communities are single unit detached properties (Ziebrath, 2015). Rural residents oppose large housing developments, even
if they may be more effective, because they want to maintain a status quo and the “rural character” of their community (Ziebrath, 2015). Since most housing structures in rural communities cannot accommodate multiple families, “doubling up” may occur once all options are exhausted. Doubling up, also knowing as household crowding, with friends and family in single unit structures is an invisible form of homelessness and creates additional problems within rural areas (Ziebrath, 2015).

Rural communities’ heavy reliance on manufactured, or mobile, homes as a means of affordable housing is harmful for those in need as well. Most mobile homeowners do not own the land their unit is situated on, they have poor legal protections, use high-risk loans to finance their property, and are locked into lengthy mortgages which makes full ownership of their mobile home very difficult (MacTavish et al, 2006). Using Robeson County as an example, Time-Out Communities, a Florida-based development company, purchased mobile home lots following Hurricane Matthew and raised rents two to three times their previous amount which further burdens individuals in need (Morris, 2019).

Problems associated with mobile homeownership are relevant to both North Carolina and its American Indian Communities. North Carolina has the 3rd largest number of mobile home units in the United States (U.S. Census Bureau, 2018a). In Sampson County, home to the Coharie Tribe, 37% of the total housing stock is comprised of mobile homes which is 24 percentage points higher than the state average (U.S. Census Bureau, 2018a). These numbers are similar in other American Indian communities.

State-Specific Issues for North Carolina’s American Indians

North Carolina’s American Indian Tribes face a variety of state specific hardships. The largest disadvantage for most tribes relates to recognition. Of North Carolina’s eight American Indian Tribes, the Eastern Band of Cherokee Indians is the sole tribe to have tribal trust land and full federal recognition. The Eastern Band of Cherokee Indians have sovereignty within the Qualla Boundary and access to additional federal housing funds such as the Native American Housing Block Grant (Congressional Research Service, 2015). The Lumbee Tribe is federally
recognized as an Indian Tribe, but the Lumbee Act of 1956 has prevented them from receiving access to some, not all, federal resources (The Lumbee Tribe of North Carolina, 2020).

Tribes located in the coastal plains, the Lumbee, Coharie, Waccamaw Siouan, Meherrin, and Haliwa-Saponi, are impacted by natural disasters. Hurricanes cause major flooding and further reduce already depleted housing stocks. Lumberton, a town in Robeson County, lost 25% of its affordable housing units after Hurricanes Matthew and Florence. The waitlist for an affordable unit includes over 900 individuals (Morris, 2019). In addition, many properties in the region are uninsured. 70% to 85% of properties that experienced flood damage during Hurricane Florence were not covered by the National Flood Insurance Program (Varn, 2018).

Large pig and chicken farms are located throughout the Coastal Plains as well (USDA NASS, 2018a & USDA NASS, 2018b). During floods, open air manure lagoons overflow and disproportionately affect American Indian communities (Philpott, 2019). Livestock operations also have negative effects on housing prices, and their presence may act as an additional deterrent for affordable housing developers (Park et al, 2004).

**Gaps in Research**

Published data is sparse and fails to contextualize the current struggles of American Indians. The research that is available appears to focus on federally recognized tribes located in the Western United States. Due to the unique circumstances of American Indians in North Carolina, project findings may help fill these gaps.

**4. Methods**

Properly contextualizing the conditions of American Indians requires an analysis of selected constituent communities; this includes Robeson, Halifax, Sampson, & Swain counties. Robeson, anchor for the Lumberton micropolitan statistical area, is the largest of the selected counties (U.S. Census Bureau, 2018a). It also serves as the economic, cultural, and political center for the Lumbee Tribe, which has approximately 55,000 members (NCCIA, 2020). Halifax & Sampson counties are both significantly smaller in population size (U.S. Census Bureau, 2018a). They serve as the centers for the Haliwa-Saponi and Coharie tribes, which are,
respectively, the 3rd and 4th largest tribes in North Carolina (NCCIA, 2020). The Qualla Boundary, the trust land for the Eastern Band of Cherokee Indians, is partly located in Swain County (NCCIA, 2020). Differences for American Indians living on and off the Boundary can be observed and analyzed. Together, the four counties constitute over 50 percent of North Carolina’s American Indian population (U.S. Census Bureau, 2018a). While all are rural, each is geographically located in different regions of the state as well.

To provide the most accurate portrait of the conditions in each county as possible in light of COVID-19, this report includes analysis of the following:

1. Demographic & economic characteristics
2. Existing federal & state policies or programs
3. Insights from Tribal Leaders & Housing Experts

This report begins to define the needs in each community, inform the Commission on how to offer targeted support, and assist in advocating for additional funding from state legislators. In addition, this research methodology shall be replicable. This allows the Commission to analyze the needs of additional American Indian communities in the future and to track outcomes over time.

The reasoning for selecting each point of interest is discussed in more detail below.

**Demographic & Economic Characteristics**

Demographic & economic data help contextualize the disparities that exist within each selected community. Quantitative data allows for comparison within each respective county across racial and ethnic identities. Aggregate county data can then be compared to state-level averages to help identify rural-specific differences.

Most data are gathered from the Census Bureau’s American Community Survey (ACS). The most recent ACS 5-Year Estimates, spanning from 2014 to 2018, are used. Although not as current as one-year estimates, five-year estimates are more reliable and allow for more precise analysis at both the county and census tract levels. In addition, 2018 ACS data are compared to 2010 & 2014 ACS 5-Year Estimates, which span from 2006 until 2014, to show growth or decline in specific variables.
Collected data points include the following: Unemployment Rate, Poverty Status, Per Capita Income (Adjusted for Inflation), Median Household Income (Adjusted for Inflation), Educational Attainment, Food Stamp/SNAP Usage, Lack of Health Insurance, No Internet Subscription or Computer Access, Median Monthly Housing Costs (Adjusted for Inflation), Median Gross Rent by Bedrooms, Fair Market Rents (FMRs), Cost-Burden, Tenure, Median Household Values (Adjusted for Inflation), & Share of Mobile Homes Relative to Total Housing Stock.

Variables such as Unemployment Rate, Poverty Status, Per Capita Income, and Median Household Income are used to illustrate overall economic prosperity and development in each county. Educational Attainment, SNAP Usage, Health Insurance Coverage, and No Internet or Computer Access are used as supplemental economic, or “status” related, indicators for years in which they were measured. Health Insurance Coverage was only tracked for the 2014 & 2018 ACS; No Internet or Computer Access was only tracked for the 2018 ACS.

Median Monthly Housing Costs & Median Gross Rent by Bedrooms, compared to HUD’s Fair Market Rents (FMRs) for each year being measured, illustrate housing (in)affordability for those using government assistance, or “Section 8”. This is supplemented with Cost-Burden data. Tenure is used to measure changes in homeownership, and, subsequently, wealth accrual. Median Household Value loosely illustrates possible wealth disparities for those who do own their respective housing unit. Share of Mobile Homes tracks general changes in respective housing stocks as well as the increase or decrease in the prevalence of risky housing alternatives.

Where applicable, data points for American Indians are compared to non-Hispanic Whites in each respective county to highlight disparate outcomes. Given the well-documented history of supremacy, privilege, and positive social bias associated with whiteness in the United States, particularly in the South, this comparison is most appropriate. County-level data will be compared to state averages as well.

Demographic data are supplemented with visualizations using Tableau & ArcGIS Pro which help illustrate present disparities. Additional data and visualizations from the North Carolina Housing Coalition, an advocacy organization interested in addressing the housing
needs and improving the policies impacting low-and-moderate-income residents, are also included.

It is important to note certain data points from ACS 5-Year Estimates have large margins of error due to the difficulties of mass data collection. For American Indian population data in particular, there is general unreliability due to the Census’ s changing racial categories, self-identification vs. enrolled status, as well as governmental distrust. Additionally, data for the number of American Indians in each county, which is provided in the data analysis section, include individuals who are American Indian alone or in combination with another race which slightly inflates the population. This is to account for individuals who are bi-racial but identify as American Indian. Other collected data points which were listed above, only account for American Indians alone, not in combination with another race. As a result, aggregate numbers and percentages for some visualizations may not match although the data source is the same.

With this considered, the ACS is still the most accurate dataset available for this type of analysis and the disparities between whites and American Indians remain regardless of the American Indian classification used.

**Existing Policies & Programs**

It is important to research and analyze existing policies, programs, or regulations that may impact housing use and access. Since most Public Housing Authorities (PHAs), Economic Development Offices, & Tribal Administrations in constituent communities are short staffed, they may not have the resources nor the time to implement changes or improvements to their current operations. A “program inventory” can inform interested parties on the benefits & disadvantages of relevant policies or programs, how to possibly increase affordable housing access, and improve economic outcomes for tribe members.

Visualizations published by HUD, particularly the Qualified Census Tract (QCTs) and Difficult Development Area (DDAs) maps, are also used when applicable. These maps help with pinpointed interventions.
Insights from Tribal Leaders & Housing Experts

When working with marginalized communities, it is imperative that the voices of individuals who are a part of said communities are heard and incorporated into the research. Failing to do so in some way, shape, or form reduces the accuracy of subsequent analysis and is a disservice to the populations of interest. Tribal leaders and administrators are able to provide insight into issues that may not be covered adequately, or at all in some instances, in academia.

Similarly, the perspective of North Carolina specific housing experts must be accounted for. This is particularly true in North Carolina and its accompanying rural communities. The vast majority of available research on affordable housing is done so through an “urban lens” which fails capture the unique issues associated with rurality.

5. Data Analysis

Data for each constituent county is provided below and analyzed in three different groupings which include Housing, Economic, and Supplemental Economic Indicators. Data tables for referenced visualizations are provided in the Appendix; appropriate page numbers are listed underneath each graphic.
Halifax County
Location of American Indians

Figure 1: American Indian Population vs. Proportion (2018)

Percent American Indian By Census Tract
Percentage
- ≤1
- ≤2
- ≤5
- ≤14
- ≤36

American Indian Population By Census Tract
Total Number
- ≤26
- ≤30
- ≤56
- ≤264
- ≤1911

Source: U.S. Census Bureau, 2018a; Accompanying Data Table: Page 167
According to the 2018 ACS, American Indians represent five percent of the total population in Halifax County (U.S. Census Bureau, 2018a). Most are located in the Southeastern and Southwestern regions of the county. The Southwestern census tract in particular also has the largest proportion of American Indians, representing roughly 36 percent of the tract’s total population (U.S. Census Bureau, 2018a). This map, and subsequent Population vs. Proportion maps for each county, will be used as a reference for additional visualizations.
To begin, Fair Market Rents, or Section 8, must be discussed in more depth. HUD provides FMR housing vouchers in the form of subsidies to low-income renters. Voucher recipients typically pay 30 percent of their income on rent and remaining housing costs are covered by HUD up to that individuals respective FMR limit (HUD, 1998). For example, if an individual was eligible for a 1-Bedroom apartment in 2018 in Halifax County, the maximum FMR allowance they could receive was $605 (U.S. Census Bureau, 2018a). Once an individual selected an apartment, they would pay 30 percent of their income on rent and HUD would pay any remaining costs up to that $605 limit. If an individual rented a unit that exceeded $605, they would be responsible for paying 30 percent of their income and any additional costs over the FMR limit. This is important to consider throughout the Data Analysis section.
As indicated above (Figure 2), the difference between Median Monthly Housing Costs and maximum Fair Market Rent voucher allowances for Halifax County has decreased over time (U.S. Census Bureau 2018a, 2014, 2010a & HUD PDR 2018, 2014, 2010). This subsequently means individuals in need are receiving more money for housing related expenses. It is important to note that Median Monthly Housing Cost values include housing and utility costs for all unit sizes and both rented and owned units (U.S. Census Bureau, 2020). While it is a good
approximation for the general cost associated with living in a specific county, Median Gross Rent by Bedrooms may be more appropriate to determine affordability (Figure 3-6).

**Figure 3: FMRs vs. Median Gross Rents for 1-Bedroom Units in Halifax County**

<table>
<thead>
<tr>
<th></th>
<th>2015</th>
<th>2016</th>
<th>2017</th>
<th>2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>Median Gross Rent</td>
<td>430</td>
<td>388</td>
<td>383</td>
<td>436</td>
</tr>
<tr>
<td>FMR 1-Bedroom</td>
<td>534</td>
<td>548</td>
<td>568</td>
<td>605</td>
</tr>
</tbody>
</table>

**Source:** U.S. Census Bureau 2018a, 2017, 2016, 2015 & HUD PDR 2018, 2017, 2016, 2015; Data Table: Page 167

The figure above illustrates the difference between HUDs Fair Market Rents (FMRs) and the Median Gross Rents for 1-Bedroom units in the respective County. FMR data is from HUD (2015, 2016, 2017, & 2018) and Median Gross Rents are from the U.S. Census Bureau's ACS 5-Year Estimates (2015, 2016, 2017, & 2018). Additionally, Median Gross Rents are not adjusted for inflation. For example, Median Gross Rents for 2015 are in 2015 Dollars. This makes comparisons more accurate as FMRs are recalculated for inflation every year. 2015 FMRs are in 2015 Dollars, 2016 FMRs are in 2016 Dollars, and so forth.
The figure above illustrates the difference between HUDs Fair Market Rents (FMRs) and the Median Gross Rents for 2-Bedroom units in the respective County. FMR data is from HUD (2015, 2016, 2017, & 2018) and Median Gross Rents are from the U.S. Census Bureau's ACS 5-Year Estimates (2015, 2016, 2017, & 2018). Additionally, Median Gross Rents are not adjusted for inflation. For example, Median Gross Rents for 2015 are in 2015 Dollars. This makes comparisons more accurate as FMRs are recalculated for inflation every year. 2015 FMRs are in 2015 Dollars, 2016 FMRs are in 2016 Dollars, and so forth.
The figure above illustrates the difference between HUDs Fair Market Rents (FMRs) and the Median Gross Rents for 3-Bedroom units in the respective County. FMR data is from HUD (2015, 2016, 2017, & 2018) and Median Gross Rents are from the U.S. Census Bureau’s ACS 5-Year Estimates (2015, 2016, 2017, & 2018). Additionally, Median Gross Rents are not adjusted for inflation. For example, Median Gross Rents for 2015 are in 2015 Dollars. This makes comparisons more accurate as FMRs are recalculated for inflation every year. 2015 FMRs are in 2015 Dollars, 2016 FMRs are in 2016 Dollars, and so forth.
Median Gross Rent by Bedrooms, which was first measured by the U.S. Census Bureau in 2015, measures rent and utility expenses for rental properties exclusively (U.S. Census Bureau, 2015 & 2020). For the years available, Median Gross Rents for all units have remained below FMR voucher allowances U.S. Census Bureau, 2015, 2016, 2017, & 2018a). While it appears renters are not cost-burdened, housing remains unaffordable and inadequate in Halifax County.
According to the North Carolina Housing Coalition, the average renter today, regardless of race, in Halifax County can only afford to pay $519 worth of rent each month which is well below Median Monthly Housing Costs (North Carolina Housing Coalition, 2019a). This $519 value is also well below Median Gross Rents for all unit sizes except 1-Bedroom units.

Although Median Gross Rent for 1-Bedroom units in Halifax County is $436, this number may be inaccurate or underreported in the ACS (U.S. Census Bureau, 2018a). If Median Gross Rent for 1-Bedroom units is truly $436, one must question the conditions in which individuals are living in. HUD sets FMRs at the minimum price necessary for rental units to be deemed safe and have basic necessities in a given region (HUD, 1998). For 2018, the Median Gross Rent for a 1-Bedroom unit in Halifax County was $169 below the FMR for a 1-Bedroom Unit.

While FMRs are intended to improve affordability, they may not be effective in offsetting financial burdens. Individuals must still pay for basic needs associated with housing such as utilities, food, and transportation. These expenses can be cumbersome, particularly for those with low or unstable incomes. For context, without any assistance from HUD, an individual employed at minimum wage would have to work roughly 63 hours a week to pay for rent alone at a 1-Bedroom apartment that meets basic needs (NLIHC, 2019c). A 1-Bedroom apartment meeting basic needs would be one set at Fair Market Rent in Halifax County, which is $605 (U.S. Census Bureau, 2018a). Given the disparate economic outcomes of American Indians, which is discussed in the following section, American Indians are likely overrepresented in the number of individuals receiving minimum wage.

Even if an individual receives rental assistance, this illustrates how expensive additional necessities are for individuals with unstable or low incomes. This problem is exacerbated even further in regions such as Halifax County where energy & utility costs run high.

The average family today in Halifax County spends roughly 8 percent of their monthly income on energy-related costs alone (Figure 7). For renters and owners that are low-income, this number jumps to roughly 20 percent (North Carolina Housing Coalition, 2019a). In accordance to the U.S. Department of Health and Human Services, paying more than 6 percent is considered unaffordable (North Carolina Housing Coalition, 2019a).
Other expenses such as health & childcare, transportation, and food make housing even more unaffordable. While roughly 15 to 20 percent of households in each census tract are cost-burdened, the percent of cost-burdened households appears to be higher for census tracts that have large American Indian populations (Figure 8) (U.S. Census Bureau, 2018a).
Figure 8: Share of Cost-Burdened Household by Census Tract (2018)

Source: U.S. Census Bureau, 2018a; Accompanying Data Table: Page 169
It is important to note that American Indians rent at lower rates in comparison to whites (Figure 9). This means they are less likely to be represented in the North Carolina Housing Coalition’s statistic indicating the average renter can only afford $519 worth of rent. The current American Indian rentership rate of 27 percent, which is 13-percentage points lower in comparison to 2010 ACS Estimates, is also lower than the state average (U.S. Census Bureau 2018a, 2013, 2010). While this subsequently means American Indians own at higher rates, this does not appear to benefit American Indians economically. Not only does owning a home help with housing stability, it also represents a possible form of wealth accrual for many individuals.
But the Median Household Values are significantly lower in census tracts with larger American Indian populations (Figure 10) (U.S. Census Bureau 2018a). For example, Median Household Values in Census Tract 9308, located in the lower left portion of the County, are roughly $65,000. Other census tracts with fewer American Indians have values that are roughly $145,000.
Figure 10: Median Home Values (2018)

Source: U.S. Census Bureau, 2018a; Accompanying Data Table: Page 169
Homeownership may not equate to ownership of “traditional” single detached units either. The share of mobile homes in Halifax County is currently 22 percent, 9 percentage points higher than the state average (Figure 11) (U.S. Census Bureau, 2018a). American Indians also occupy mobile homes at roughly two times the rate of whites (Figure 12) (U.S. Census Bureau, 2018a). In some census tracts, mobile home occupancy for American Indians is between 64 to 100 percent of all-American Indian households (Figure 13) (U.S. Census Bureau, 2018a). Lastly, most mobile homes in the county are owned as opposed to rented (Figure 14).

Figure 11: Share of Mobile Homes Relative to Total Housing Stock in Halifax County

![Graph showing the share of mobile homes relative to the total housing stock in Halifax County.](image)

Source: U.S. Census Bureau 2018a, 2014, 2010a; Accompanying Data Table: Page 179

The illustration above depicts the share of mobile homes with respect to the total housing stock in the respective county. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Mobile Home Share is depicted as well.
Figure 12: Mobile Home Residency by Race in Halifax County

Source: U.S. Census Bureau 2018a, 2014, 2010a; Accompanying Data Table: Page 179

The figure above represents the share, or percentage, of all whites & American Indians living in Mobile Homes. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Average for residents living in Mobile Homes (all races) is depicted as well.
Figure 13: Share of American Indians in Mobile Homes Relative to Total American Indian Housing Stock (2018)

Source: U.S. Census Bureau, 2018a; Accompanying Data Table: Page 170
Higher ownership rates for American Indians in general is likely attributed to them owning more mobile homes. But, as has been referenced earlier in this report, there are many risks associated with mobile home ownership. Additionally, the median values of mobile homes are significantly lower than the values of “traditional” homes (Figure 15). For context, the highest median mobile home value is around $50,000 dollars. The lowest median “traditional” home values are a roughly $65,000 dollars (U.S. Census Bureau, 2018a). This has severe implications for building wealth and overall economic well-being.
Figure 15: Mobile Home Values (2018)

Median Mobile Home Values
By Census Tract
U.S. Dollars
≤19600
≤26900
≤34200
≤41500
≤48800
No Data Available

Greensboro
Raleigh
Charlotte
Columbia

Source: U.S. Census Bureau, 2018a; Accompanying Data Table: Page 169
These disparate outcomes not only exist in housing but manifest themselves in other areas of an individual’s, or family’s, life.
Economic Statistics

Large disparities exist between whites and American Indians in Median Household Income, Per Capita Income, Poverty, and Unemployment (Figure 16-19). Other than unemployment, these disparities have not fluctuated much over time. As is illustrated by income measures and poverty, American Indians are financially burdened at disproportionate rates.

Figure 16: Median Household Income by Race (Adjusted for Inflation) in Halifax County

<table>
<thead>
<tr>
<th></th>
<th>2010</th>
<th>2014</th>
<th>2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dollar Amount</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>55K</td>
<td>NC State Median</td>
<td>NC State Median</td>
<td>NC State Median</td>
</tr>
<tr>
<td>50K</td>
<td>48,676 White</td>
<td>49,442</td>
<td>45,795</td>
</tr>
<tr>
<td>45K</td>
<td>26,767 American Indian</td>
<td>26,066</td>
<td>29,219</td>
</tr>
<tr>
<td>40K</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>35K</td>
<td></td>
<td></td>
<td></td>
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<td>30K</td>
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<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>0K</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau 2018a, 2014, 2010a; Accompanying Data Table: Page 180

The figure above illustrates the Median Household Income for whites & American Indians living in the respective County. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Median Household Income (all races) is depicted as well. Dollar Amounts for each year are adjusted for 2018 inflation.
The figure above illustrates the Per Capita Household Income for whites & American Indians living in the respective county. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Per Capita Income (all races) is depicted as well. Dollar Amounts for each year are adjusted for 2018 inflation.

Source: U.S. Census Bureau 2018a, 2014, 2010a; Accompanying Data Table: Page 180
Figure 18: Poverty Rate by Race in Halifax County

The illustration above depicts poverty by race in the respective county. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Poverty Rate (all races) is depicted as well.

Source: U.S. Census Bureau 2018a, 2014, 2010a; Accompanying Data Table: Page 181
Unemployment has decreased by seven percentage points in comparison to 2010 ACS 5-Year estimates, which is likely attributed to the recovery from The Great Recession (Figure 19) (U.S. Census Bureau 2018a & 2010a). But unemployment for American Indians is still two times that of whites (U.S. Census Bureau 2018a). This translates to increased difficulty in accessing adequate housing due to income constraints, further exacerbating the disparities discussed above.

Figure 19: Unemployment Rate by Race in Halifax County

The illustration above depicts unemployment by race in the respective county. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Unemployment Rate (all races) is depicted as well.

Source: U.S. Census Bureau 2018a, 2014, 2010a; Accompanying Data Table: Page 181
Supplemental Economic Statistics

As is the case for other measured variables, there are large disparities in supplemental economic indicators. American Indians are not able to access certain spaces, jobs, & privileges associated with having a post-secondary degree, need government assistance to meet basic needs, and are at risk for incurring large health costs in the event of illness (Figure 20-23).

Figure 20: No Bachelor’s Degree or Higher by Race in Halifax County

Source: U.S. Census Bureau 2018a, 2014, 2010a; Accompanying Data Table: Page 182

The illustration above depicts the percent of residents that do not have a Bachelor's Degree or higher, by race, for the respective county. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Average for residents (all races) without a Bachelor's Degree or higher is depicted as well.
Figure 21: Food Stamp/SNAP Usage by Race in Halifax County

Source: U.S. Census Bureau 2018a, 2014, 2010a; Accompanying Data Table: Page 182

The illustration above depicts the percent of residents that use Food Stamp/SNAP assistance, by race, for the respective county. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Food Stamp/SNAP Usage Rate (all races) is depicted as well.
Figure 22: No Health Insurance by Race in Halifax County

The illustration above depicts the percent of residents that do not have Health Insurance Coverage, by race, for the respective county. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2014 & 2018. Health Insurance data is not available for the 2010 ACS 5-Year Estimates. The North Carolina State Average (all races) is depicted as well.

Source: U.S. Census Bureau 2018a, 2014; Accompanying Data Table: Page 183
The largest disparity is associated with computer and internet access; American Indians are twice as likely to be disconnected from digital resources (Figure 23) (U.S Census Bureau, 2018a).

**Figure 23: No Computer or Internet by Race in Halifax County (2018)**

<table>
<thead>
<tr>
<th>Percentage</th>
<th>No Computer or Internet Access</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Halifax</td>
</tr>
<tr>
<td></td>
<td>White</td>
</tr>
<tr>
<td></td>
<td>American Indian</td>
</tr>
<tr>
<td>24.70</td>
<td>White</td>
</tr>
<tr>
<td>50.90</td>
<td>American Indian</td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau, 2018a; Accompanying Data Table: Page 183

The illustration above depicts the percent of residents that do not have an Internet Subscription or a Computer, by race, for each respective county. Data is from the U.S. Census Bureau’s ACS 5-Year Estimates for 2018. Data on Internet Subscriptions & Computer Access is not tracked in the ACS 5-Year Estimates for 2010 and 2014. The North Carolina State Average (all races) is depicted as well.

Each of these outcomes have compounding effects which makes accessing adequate and affordable housing a daunting task.
Robeson County
Location of American Indians

Figure 24: American Indian Population vs. Proportion (2018)

Percent American Indian
By Census Tract
Percentage
- ≤18
- ≤27
- ≤40
- ≤60
- ≤90

American Indian Population
By Census Tract
Total Number
- ≤728
- ≤1001
- ≤1640
- ≤3143
- ≤6675

Source: U.S. Census Bureau, 2018a; Accompanying Data Table: Page 167
American Indians constitute 41 percent of the county’s total population. Most American Indians are located in the Western and Northwestern census tracts of Robeson county (U.S. Census Bureau 2018a).
Housing Statistics

Maximum FMR voucher allowances for all units, with the exception of 1-bedrooms, have exceeded the Median Household Costs in Robeson County for each ACS 5-Year Estimates (Figure 25) (U.S. Census Bureau 2018a, 2014, 2010a & HUD PDR 2018, 2014, 2010).

Figure 25: FMRs vs. Median Monthly Housing Costs in Robeson County

The figure above illustrates the difference between HUDs Fair Market Rents (FMRs) and the Median Monthly Housing Costs in the respective County. Only Fair Market Rents (FMRs) for 1-Bedroom through 4-Bedroom Units are accounted for as FMRs for Efficiency Units are similar to that of 1-Bedroom Units. FMR data is from HUD (2010, 2014, & 2018) and Median Monthly Housing Costs are from the U.S. Census Bureau's ACS 5-Year Estimates (2010, 2014 & 2018). Additionally, Median Monthly Housing Costs are not adjusted for inflation. For example, Median Monthly Housing Costs for 2010 are in 2010 Dollars. This makes comparisons more accurate as FMRs are recalculated for inflation every year. 2010 FMRs are in 2010 Dollars, 2014 FMRs are in 2014 Dollars, and so forth.

As a reminder, while Median Household Costs offer a good approximation for general housing costs, Median Gross Rent by Bedrooms may be more appropriate to determine affordability (Figure 26-29).

Figure 26: FMRs vs. Median Gross Rents for 1-Bedroom Units in Robeson County

The figure above illustrates the difference between HUDs Fair Market Rents (FMRs) and the Median Gross Rents for 1-Bedroom units in the respective County. FMR data is from HUD (2015, 2016, 2017, & 2018) and Median Gross Rents are from the U.S. Census Bureau's ACS 5-Year Estimates (2015, 2016, 2017, & 2018). Additionally, Median Gross Rents are not adjusted for inflation. For example, Median Gross Rents for 2015 are in 2015 Dollars. This makes comparisons more accurate as FMRs are recalculated for inflation every year. 2015 FMRs are in 2015 Dollars, 2016 FMRs are in 2016 Dollars, and so forth.
Figure 27: FMRs vs. Median Gross Rents for 2-Bedroom Units in Robeson County

<table>
<thead>
<tr>
<th></th>
<th>2015</th>
<th>2016</th>
<th>2017</th>
<th>2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>FMR</td>
<td>564</td>
<td>632</td>
<td>648</td>
<td>642</td>
</tr>
<tr>
<td>Median Gross Rent</td>
<td>563</td>
<td>577</td>
<td>586</td>
<td>683</td>
</tr>
</tbody>
</table>


The figure above illustrates the difference between HUDs Fair Market Rents (FMRs) and the Median Gross Rents for 2-Bedroom units in the respective County. FMR data is from HUD (2015, 2016, 2017, & 2018) and Median Gross Rents are from the U.S. Census Bureau's ACS 5-Year Estimates (2015, 2016, 2017, & 2018). Additionally, Median Gross Rents are not adjusted for inflation. For example, Median Gross Rents for 2015 are in 2015 Dollars. This makes comparisons more accurate as FMRs are recalculated for inflation every year. 2015 FMRs are in 2015 Dollars, 2016 FMRs are in 2016 Dollars, and so forth.
The figure above illustrates the difference between HUDs Fair Market Rents (FMRs) and the Median Gross Rents for 3-Bedroom units in the respective County. FMR data is from HUD (2015, 2016, 2017, & 2018) and Median Gross Rents are from the U.S. Census Bureau's ACS 5-Year Estimates (2015, 2016, 2017, & 2018). Additionally, Median Gross Rents are not adjusted for inflation. For example, Median Gross Rents for 2015 are in 2015 Dollars. This makes comparisons more accurate as FMRs are recalculated for inflation every year. 2015 FMRs are in 2015 Dollars, 2016 FMRs are in 2016 Dollars, and so forth.
Figure 29: FMRs vs. Median Gross Rents for 4-Bedroom Units in Robeson County

<table>
<thead>
<tr>
<th>Year</th>
<th>Median Gross Rent</th>
<th>FMR 4-Bedroom</th>
</tr>
</thead>
<tbody>
<tr>
<td>2015</td>
<td>731</td>
<td>973</td>
</tr>
<tr>
<td>2016</td>
<td>740</td>
<td>962</td>
</tr>
<tr>
<td>2017</td>
<td>734</td>
<td>946</td>
</tr>
<tr>
<td>2018</td>
<td>745</td>
<td>987</td>
</tr>
</tbody>
</table>


The figure above illustrates the difference between HUDs Fair Market Rents (FMRs) and the Median Gross Rents for 4-Bedroom units in the respective County. FMR data is from HUD (2015, 2016, 2017, & 2018) and Median Gross Rents are from the U.S. Census Bureau's ACS 5-Year Estimates (2015, 2016, 2017, & 2018). Additionally, Median Gross Rents are not adjusted for inflation. For example, Median Gross Rents for 2015 are in 2015 Dollars. This makes comparisons more accurate as FMRs are recalculated for inflation every year. 2015 FMRs are in 2015 Dollars, 2016 FMRs are in 2016 Dollars, and so forth.

Median Gross Rents for all units, regardless of size, have also remained below FMR voucher allowances (U.S. Census Bureau, 2015, 2016, 2017, & 2018a). But, similar to Halifax County, housing in the area remains unaffordable.

According to the North Carolina Housing Coalition, the average renter in Robeson County can only afford a monthly rent of $485 which is roughly $100 below Median Monthly Housing Costs (North Carolina Housing Coalition, 2019b). This $485 value is also well below Median Gross Rents for all unit sizes except 1-Bedroom units.
Median Gross Rent for 1-Bedroom units in Robeson County is $390. This value seems to be remarkably low, but it may be inaccurate or underreported in the ACS (U.S. Census Bureau, 2018a). If Median Gross Rent for 1-Bedroom units is truly $390, housing conditions may be poor. To reiterate, HUD sets FMRs at the minimum price necessary for rental units to be deemed safe and have basic necessities in a given region (HUD, 1998). For 2018, the Median Gross Rent for a 1-Bedroom unit in Halifax County was $124 below the FMR for a 1-Bedroom Unit.

As mentioned previously, receiving assistance from HUD does not mean basic needs associated with housing such as utilities, food, and transportation are met. In Robeson County, an individual employed at minimum wage would have to work roughly 55 hours a week to pay for rent alone at a 1-Bedroom apartment that is deemed safe and adequate, or, set at the Fair Market Rent price of $514 (NLIHC, 2019c). This illustrates how expensive additional necessities are for individuals like American Indians, who disproportionately have unstable or low incomes. Like Halifax, Robeson County also has high energy & utility costs which exacerbate the problem of unaffordability.

Average Robeson County families spend 6.3 percent of their monthly income on energy-related costs (Figure 30). Low-income renters and owners spend between 13 to 16 percent of their income on energy costs (North Carolina Housing Coalition, 2019b). Percentages for low-income households and “average” households exceed the U.S. Department of Health and Human Services unaffordability limit (North Carolina Housing Coalition, 2019b).
Cost-burdens, attributed to energy costs and other household expenses (i.e. food, insurance, etc.), are further illustrated in Figure 31. Roughly 15 to 20 percent of all households in each census tract are cost-burdened, but this increases for some census tracts that have large American Indian populations (U.S. Census Bureau, 2018a). It is interesting to note that two of the county’s census tracts with the largest population and proportion of American Indians have the smallest share of cost-burdened households.
Figure 31: Share of Cost-Burdened Households by Census Tract (2018)

Source: U.S. Census Bureau, 2018a; Accompanying Data Table: Page 171
Additionally, rentership rates for American Indians have declined but remain about 2 percentage points higher than whites in Robeson County (Figure 32) (U.S. Census Bureau, 2018a, 2014, & 2010a). This means American Indians are more likely to be represented in the North Carolina Housing Coalition’s statistic indicating the average renter can only afford $485 worth of rent. Similar to Halifax County, American Indians who are able to own their housing unit may not benefit economically. Median Household Value tend to be lower in census tracts with larger American Indian populations (Figure 33) (U.S. Census Bureau, 2018a).

Figure 32: Rentership by Race in Robeson County

The illustration above depicts the percent of renters by race in the respective county. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Rentership Rate (all races) is depicted as well.
Figure 33: Median Home Values (2018)

Source: U.S. Census Bureau, 2018a; Accompanying Data Table: Page 171
Homeownership for American Indians does not equate to ownership of “traditional” units for Robeson County either. Mobile homes in Robeson County have consistently represented 40 percent of the entire housing stock, roughly three times higher than the state average (Figure 34) (U.S. Census Bureau, 2018a, 2014, & 2010a). In addition, 50 percent of American Indians occupy mobile homes which has consistently been two times that of whites and three times the state average (Figure 35) (U.S. Census Bureau, 2018a, 2014, & 2010a).

**Figure 34: Share of Mobile Homes Relative to Total Housing Stock in Robeson County**

<table>
<thead>
<tr>
<th>Year</th>
<th>Percentage</th>
<th>Housing Units in Structure</th>
</tr>
</thead>
<tbody>
<tr>
<td>2010</td>
<td>61.40</td>
<td>Other Housing Structures</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Mobile Homes</td>
</tr>
<tr>
<td>2014</td>
<td>61.30</td>
<td>NC State Mobile Home Share</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2018</td>
<td>61.70</td>
<td></td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau 2018a, 2014, 2010a; Accompanying Data Table: Page 179

The illustration above depicts the share of mobile homes with respect to the total housing stock in the respective county. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Mobile Home Share is depicted as well.
More specifically, the share of American Indians occupying mobile homes relative to all American Indian households in each respective census tract is between 40 to 90 percent for most of the county’s census tracts (Figure 36) (U.S. Census Bureau, 2018a).
Figure 36: Share of American Indians in Mobile Homes Relative to Total American Indian Housing Stock (2018)

Source: U.S. Census Bureau, 2018a; Accompanying Data Table: Page 173
Most mobile homes in the county are also owned as opposed to rented, although rentership rates for mobile homes are slightly higher than Halifax County (Figure 37). More mobile home renters mean more individuals are exposed to additional risk; they do not own their unit or the land their unit sits on. For those who are able to own their mobile home, median mobile home values are significantly lower than the values of “traditional” homes. Census tracts with large American Indian populations have mobile homes valued at $30,000 to $50,000 which is $30,000 to $10,000 lower than the lowest valued “traditional” homes (i.e. $62,000) (Figure 38) (U.S. Census Bureau, 2018a).

**Figure 37: Tenure (Rentership vs. Ownership) by Mobile Home in Robeson County**

![Bar chart showing tenure (%) by mobile home in Robeson County, with 2010: Owners 65.82%, Renters 34.18%, 2014: Owners 63.40%, Renters 36.60%, 2018: Owners 64.72%, Renters 35.28%]

*Source: U.S. Census Bureau 2018a, 2014, 2010a; Accompanying Data Table: Page 178*

The illustration above depicts the share of Renters and Owners in Mobile Home Units for the respective county. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Mobile Home Rentership percentage is depicted as well for reference.
Figure 38: Mobile Home Values (2018)

Source: U.S. Census Bureau, 2018a; Accompanying Data Table: Page 171
Economic Statistics

Economic and supplemental economic statistics have followed similar trends as Halifax County. There are large disparities in most, if not all, selected indicators which have negative compounding effects. This makes accessing adequate and affordable housing increasingly difficult for American Indians. Due to similarities between Halifax and Robeson County, only visualizations will be provided for each section. Further comments can be found on page 31.

Figure 39: Median Household Income by Race (Adjusted for Inflation) in Robeson County

The figure above illustrates the Median Household Income for whites & American Indians living in the respective County. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Median Household Income (all races) is depicted as well. Dollar Amounts for each year are adjusted for 2018 inflation.

Source: U.S. Census Bureau 2018a, 2014, 2010a; Accompanying Data Table: Page 180
The figure above illustrates the Per Capita Household Income for whites & American Indians living in the respective County. Data is from the U.S. Census Bureau’s ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Per Capita Income (all races) is depicted as well. Dollar Amounts for each year are adjusted for 2018 inflation.

Source: U.S. Census Bureau 2018a, 2014, 2010a; Accompanying Data Table: Page 180
Figure 41: Poverty Rate by Race in Robeson County

The illustration above depicts poverty by race in the respective county. Data is from the U.S. Census Bureau’s ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Poverty Rate (all races) is depicted as well.

Source: U.S. Census Bureau 2018a, 2014, 2010a; Accompanying Data Table: Page 181
Figure 42: Unemployment by Race in Robeson County

<table>
<thead>
<tr>
<th></th>
<th>2010</th>
<th>2014</th>
<th>2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>7.00</td>
<td>9.50</td>
<td>6.20</td>
</tr>
<tr>
<td>NC State Unemployment</td>
<td>9.70</td>
<td>13.90</td>
<td>7.90</td>
</tr>
<tr>
<td>American Indian</td>
<td>9.50</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau 2018a, 2014, 2010a; Accompanying Data Table: Page 181

The illustration above depicts unemployment by race in the respective county. Data is from the U.S. Census Bureau’s ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Unemployment Rate (all races) is depicted as well.
Figure 43: No Bachelor’s Degree or Higher by Race in Robeson County

The illustration above depicts the percent of residents that do not have a Bachelor's Degree or higher, by race, for the respective county. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Average for residents (all races) without a Bachelor's Degree or higher is depicted as well.

Source: U.S. Census Bureau 2018a, 2014, 2010a; Accompanying Data Table: Page 182
Figure 44: Food Stamps/SNAP Usage by Race in Robeson County

The illustration above depicts the percent of residents that use Food Stamp/SNAP assistance, by race, for the respective county. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Food Stamp/SNAP Usage Rate (all races) is depicted as well.

Source: U.S. Census Bureau 2018a, 2014, 2010a; Accompanying Data Table: Page 182
Figure 45: No Health Insurance by Race in Robeson County

The illustration above depicts the percent of residents that do not have Health Insurance Coverage, by race, for the respective county. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2014 & 2018. Health Insurance data is not available for the 2010 ACS 5-Year Estimates. The North Carolina State Average (all races) is depicted as well.

Source: U.S. Census Bureau 2018a, 2014; Accompanying Data Table: Page 183
Figure 46: No Computer or Internet by Race in Robeson County

The illustration above depicts the percent of residents that do not have an Internet Subscription or a Computer, by race, for each respective county. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2018. Data on Internet Subscriptions & Computer Access is not tracked in the ACS 5-Year Estimates for 2010 and 2014. The North Carolina State Average (all races) is depicted as well.

Source: U.S. Census Bureau, 2018a; Accompanying Data Table: Page 183
Figure 47: American Indian Population vs. Proportion (2018)

Percent American Indian By Census Tract
Percentage
- ≤2
- ≤3
- ≤4
- ≤5
- ≤6

American Indian Population By Census Tract
Total Number
- ≤95
- ≤147
- ≤212
- ≤294
- ≤396

Source: U.S. Census Bureau, 2018a; Accompanying Data Table: Page 167
American Indians constitute three percent of Sampson County’s total population. Most are located in the Central and Northern region of the county (U.S. Census Bureau, 2018a).
Housing Statistics

Maximum FMR voucher allowances and Median Household Costs in Sampson County resemble that of Halifax and Robeson County (Figure 48) (U.S. Census Bureau, 2018a, 2014, 2010a & HUD PDR 2018, 2014, 2010).

Figure 48: FMRs vs Median Monthly Housing Costs in Sampson County (Gross Rent)

The figure above illustrates the difference between HUDs Fair Market Rents (FMRs) and the Median Monthly Housing Costs in the respective County. Only Fair Market Rents (FMRs) for 1-Bedroom through 4-Bedroom Units are accounted for as FMRs for Efficiency Units are similar to that of 1-Bedroom Units. FMR data is from HUD (2010, 2014, & 2018) and Median Monthly Housing Costs are from the U.S. Census Bureau's ACS 5-Year Estimates (2010, 2014 & 2018). Additionally, Median Monthly Housing Costs are not adjusted for inflation. For example, Median Monthly Housing Costs for 2010 are in 2010 Dollars. This makes comparisons more accurate as FMRs are recalculated for inflation every year. 2010 FMRs are in 2010 Dollars, 2014 FMRs are in 2014 Dollars, and so forth.

Median Gross Rents for all units have also remained below FMR voucher allowances (Figure 49-52) (U.S. Census Bureau, 2015, 2016, 2017, & 2018a). Like the previous two selected counties, while it appears renters are not cost-burdened, housing is still unaffordable and inadequate for the County’s most vulnerable populations.

**Figure 49: FMRs vs. Median Gross Rents for 1-Bedroom Units in Sampson County**

<table>
<thead>
<tr>
<th></th>
<th>2015</th>
<th>2016</th>
<th>2017</th>
<th>2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>FMR</td>
<td>509</td>
<td>552</td>
<td>527</td>
<td>544</td>
</tr>
<tr>
<td>Median Gross Rent</td>
<td>326</td>
<td>336</td>
<td>323</td>
<td>338</td>
</tr>
</tbody>
</table>

**Source:** U.S. Census Bureau 2018a, 2017, 2016, 2015 & HUD PDR 2018, 2017, 2016, 2015; Data Table: Page 167

The figure above illustrates the difference between HUDs Fair Market Rents (FMRs) and the Median Gross Rents for 1-Bedroom units in the respective County. FMR data is from HUD (2015, 2016, 2017, & 2018) and Median Gross Rents are from the U.S. Census Bureau's ACS 5-Year Estimates (2015, 2016, 2017, & 2018). Additionally, Median Gross Rents are not adjusted for inflation. For example, Median Gross Rents for 2015 are in 2015 Dollars. This makes comparisons more accurate as FMRs are recalculated for inflation every year. 2015 FMRs are in 2015 Dollars, 2016 FMRs are in 2016 Dollars, and so forth.
The figure above illustrates the difference between HUDs Fair Market Rents (FMRs) and the Median Gross Rents for 2-Bedroom units in the respective County. FMR data is from HUD (2015, 2016, 2017, & 2018) and Median Gross Rents are from the U.S. Census Bureau's ACS 5-Year Estimates (2015, 2016, 2017, & 2018). Additionally, Median Gross Rents are not adjusted for inflation. For example, Median Gross Rents for 2015 are in 2015 Dollars. This makes comparisons more accurate as FMRs are recalculated for inflation every year. 2015 FMRs are in 2015 Dollars, 2016 FMRs are in 2016 Dollars, and so forth.
The figure above illustrates the difference between HUD’s Fair Market Rents (FMRs) and the Median Gross Rents for 3-Bedroom units in the respective County. FMR data is from HUD (2015, 2016, 2017, & 2018) and Median Gross Rents are from the U.S. Census Bureau’s ACS 5-Year Estimates (2015, 2016, 2017, & 2018). Additionally, Median Gross Rents are not adjusted for inflation. For example, Median Gross Rents for 2015 are in 2015 Dollars. This makes comparisons more accurate as FMRs are recalculated for inflation every year. 2015 FMRs are in 2015 Dollars, 2016 FMRs are in 2016 Dollars, and so forth.

The figure above illustrates the difference between HUDs Fair Market Rents (FMRs) and the Median Gross Rents for 4-Bedroom units in the respective County. FMR data is from HUD (2015, 2016, 2017, & 2018) and Median Gross Rents are from the U.S. Census Bureau's ACS 5-Year Estimates (2015, 2016, 2017, & 2018). Additionally, Median Gross Rents are not adjusted for inflation. For example, Median Gross Rents for 2015 are in 2015 Dollars. This makes comparisons more accurate as FMRs are recalculated for inflation every year. 2015 FMRs are in 2015 Dollars, 2016 FMRs are in 2016 Dollars, and so forth.
Contrary to the data referenced above, the average renter in Sampson County can only afford a monthly rent of $498 which is roughly $100 below Median Household Costs (North Carolina Housing Coalition, 2019c). This $498 value is also well below Median Gross Rents for all unit sizes except 1-Bedroom units.

Median Gross Rent for 1-Bedroom units in Sampson County is $338, which is lowest of all four selected counties. (U.S. Census Bureau, 2018a). If Median Gross Rent for 1-Bedroom units is accurate, housing conditions in these respective units would be poor. Again, to reiterate, HUD sets FMRs at the minimum price necessary for rental units to be deemed safe and have basic necessities in a given region (HUD, 1998). For 2018, the Median Gross Rent for a 1-Bedroom unit in Sampson County was $206 below the FMR for a 1-Bedroom Unit.

Even with assistance, accessing basic needs associated with housing such as utilities, food, and transportation is difficult. In Sampson County, an individual employed at minimum wage would have to work roughly 55 hours a week to pay for rent alone at a 1-Bedroom apartment that is deemed safe and adequate, or, set at the Fair Market Rent price of $544 (NLIHC, 2019c). This illustrates how expensive additional necessities are for individuals like American Indians, who disproportionately have unstable or low incomes. Like Halifax & Robeson, Sampson County has high energy & utility costs which heightens the impacts of unaffordability (Figure 53).
Average Sampson County families spend 6.6 percent of their monthly income on energy-related costs. Low-income renters and owners spend between 15 to 20 percent of their income on energy costs (North Carolina Housing Coalition, 2019c). Similar to what has been said above, these percentages for low-income households and “average” households exceed the U.S. Department of Health and Human Services unaffordability limit (North Carolina Housing Coalition, 2019c). Cost-burdens, attributed to energy costs and other household expenses, are illustrated in Figure 54. Similar to other counties, the most burdened census tracts have large American Indian populations.
Figure 54: Share of Cost-Burdened Households by Census Tract (2018)

Source: U.S. Census Bureau, 2018a; Accompanying Data Table: Page 175
Most other housing variables have followed similar trends as Halifax and Robeson County. Rentership has decreased seven percentage points from the 2010 ACS to the 2018 ACS (U.S. Census Bureau 2018a, 2014, 2010a), which is larger than other counties. But, while rentership has declined and ownership has subsequently increased, American Indians are still more likely to experience negative outcomes. Those who own “traditional” homes likely live in areas where home values are low. Additionally, mobile home usage in the community is high and a disproportionate number of American Indians live in these mobile homes. But a large percentage of mobile homes are owned, and mobile home values are low. These values are typically lower in regions of the county that have significant American Indian populations as well.
Figure 55: Rentsership by Race in Sampson County

The illustration above depicts the percent of renters by race in the respective county. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Rentership Rate (all races) is depicted as well.

Source: U.S. Census Bureau 2018a, 2014, 2010a; Accompanying Data Table: Page 178
Figure 56: Median Home Values (2018)

Source: U.S. Census Bureau 2018a; Accompanying Data Table: Page 175
The illustration above depicts the share of mobile homes with respect to the total housing stock in the respective county. Data is from the U.S. Census Bureau’s ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Mobile Home Share is depicted as well.
Figure 58: Mobile Home Residency by Race in Sampson County

Source: U.S. Census Bureau 2018a, 2014, 2010a; Accompanying Data Table: Page 179

The figure above represents the share, or percentage, of all whites & American Indians living in Mobile Homes. Data is from the U.S. Census Bureau’s ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Average for residents living in Mobile Homes (all races) is depicted as well.
Figure 59: Share of American Indians In Mobile Homes Relative to Total American Indian Housing Stock (2018)

Source: U.S. Census Bureau 2018; Accompanying Data Table: Page 176
Figure 60: Tenure (Rentership vs. Ownership) by Mobile Home in Sampson County

The illustration above depicts the share of Renters and Owners in Mobile Home Units for the respective county. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Mobile Home Rentership percentage is depicted as well for reference.

Source: U.S. Census Bureau 2018a, 2014, 2010a; Accompanying Data Table: Page 178
Figure 61: Mobile Home Values (2018)

Source: U.S. Census Bureau 2018; Accompanying Data Table: Page 175
Economic Statistics

Economic and supplemental economic data points have also followed similar trends as Halifax and Robeson County. Large disparities exist in most, if not all, selected indicators which makes accessing adequate and affordable housing increasingly difficult for American Indians.

The one data point that differs significantly in comparison to other counties is the increase in American Indians with Health Insurance (Figure 68). From the 2014 ACS to the 2018 ACS, there was a 17-percentage point decrease in uninsured American Indians (U.S. Census Bureau 2018a & 2014). This is below the percent of uninsured whites and the state average. This may indicate American Indians ability to take advantage of the federally supported insurance offered through the Affordable Care Act. While having insurance offsets possible health costs, it has not done enough to improve other economic indicators.

Due to similarities in other variables, only visualizations will be provided for the following sections. Further comments can be found on page 31.
Figure 62: Median Household Income by Race (Adjusted for Inflation) in Sampson County

<table>
<thead>
<tr>
<th>Dollar Amount</th>
<th>2010</th>
<th>2014</th>
<th>2018</th>
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<tbody>
<tr>
<td>55K</td>
<td>53,077</td>
<td></td>
<td></td>
</tr>
<tr>
<td>50K</td>
<td></td>
<td>44,877</td>
<td>46,591</td>
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<td>45K</td>
<td>39,819</td>
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<td>0K</td>
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<td></td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau 2018a, 2014, 2010a; Accompanying Data Table: Page 180

The figure above illustrates the Median Household Income for whites & American Indians living in the respective County. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Median Household Income (all races) is depicted as well. Dollar Amounts for each year are adjusted for 2018 inflation.
The figure above illustrates the Per Capita Household Income for whites & American Indians living in the respective County. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Per Capita Income (all races) is depicted as well. Dollar Amounts for each year are adjusted for 2018 inflation.

Source: U.S. Census Bureau 2018a, 2014, 2010a; Accompanying Data Table: Page 180
Figure 64: Poverty Rate by Race in Sampson County

<table>
<thead>
<tr>
<th>Year</th>
<th>White</th>
<th>American Indian</th>
<th>NC State Poverty Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>2010</td>
<td>9.00</td>
<td>16.40</td>
<td>17.70</td>
</tr>
<tr>
<td>2014</td>
<td>15.00</td>
<td></td>
<td>15.70</td>
</tr>
<tr>
<td>2018</td>
<td>14.00</td>
<td></td>
<td>15.50</td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau 2018a, 2014, 2010a; Accompanying Data Table: Page 181

The illustration above depicts poverty by race in the respective county. Data is from the U.S. Census Bureau’s ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Poverty Rate (all races) is depicted as well.
Figure 65: Unemployment Rate by Race in Sampson County

The illustration above depicts unemployment by race in the respective county. Data is from the U.S. Census Bureau’s ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Unemployment Rate (all races) is depicted as well.

Source: U.S. Census Bureau 2018a, 2014, 2010a; Accompanying Data Table: Page 181
Figure 66: No Bachelor’s Degree or Higher by Race in Sampson County

<table>
<thead>
<tr>
<th>Year</th>
<th>White</th>
<th>American Indian</th>
<th>NC State Average</th>
</tr>
</thead>
<tbody>
<tr>
<td>2010</td>
<td>83.40</td>
<td>92.00</td>
<td>-</td>
</tr>
<tr>
<td>2014</td>
<td>83.40</td>
<td>89.00</td>
<td>-</td>
</tr>
<tr>
<td>2018</td>
<td>83.50</td>
<td>90.00</td>
<td>-</td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau 2018a, 2014, 2010a; Accompanying Data Table: Page 182

The illustration above depicts the percent of residents that do not have a Bachelor’s Degree or higher, by race, for the respective county. Data is from the U.S. Census Bureau’s ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Average for residents (all races) without a Bachelor’s Degree or higher is depicted as well.
Figure 67: Food Stamps/SNAP Usage by Race in Sampson County

The illustration above depicts the percent of residents that use Food Stamp/SNAP assistance, by race, for the respective county. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Food Stamp/SNAP Usage Rate (all races) is depicted as well.

Source: U.S. Census Bureau 2018a, 2014, 2010a; Accompanying Data Table: Page 182
Figure 68: No Health Insurance by Race in Sampson County

The illustration above depicts the percent of residents that do not have Health Insurance Coverage, by race, for the respective county. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2014 & 2018. Health Insurance data is not available for the 2010 ACS 5-Year Estimates. The North Carolina State Average (all races) is depicted as well.

Source: U.S. Census Bureau 2018a, 2014; Accompanying Data Table: Page 183
Figure 69: No Computer or Internet by Race in Sampson County

The illustration above depicts the percent of residents that do not have an Internet Subscription or a Computer, by race, for each respective county. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2018. Data on Internet Subscriptions & Computer Access is not tracked in the ACS 5-Year Estimates for 2010 and 2014. The North Carolina State Average (all races) is depicted as well.

Source: U.S. Census Bureau, 2018a; Accompanying Data Table: Page 183
Swain County
Location of American Indians

Figure 70: American Indian Population vs. Proportion (2018)

Source: U.S. Census Bureau 2018; Accompanying Data Table: Page 167
American Indians constitute 33 percent of the county’s total population (U.S. Census Bureau, 2018a). Most are located in the Eastern and Southeastern region of the county which coincides with the limits of the Qualla Boundary.
Housing Statistics

There are some key differences in Swain County as it relates to housing and economic indicators. For example, Swain County seems to be slightly more “affordable” than Halifax, Robeson, and Sampson Counties. The Median Monthly Housing Costs have been below the maximum Fair Market Rent voucher allowances for all housing unit sizes for each measured ACS 5-Year Estimates (Figure 71) (U.S. Census Bureau 2018a, 2014, 2010a & HUD PDR 2018, 2014, 2010). Similarly, Median Gross Rent by Bedrooms has remained below Fair Market Rents for each available year (Figure 72-75) (U.S. Census Bureau, 2015, 2016, 2017, & 2018a).
The figure above illustrates the difference between HUD's Fair Market Rents (FMRs) and the Median Monthly Housing Costs in the respective County. Only Fair Market Rents (FMRs) for 1-Bedroom through 4-Bedroom Units are accounted for as FMRs for Efficiency Units are similar to that of 1-Bedroom Units. FMR data is from HUD (2010, 2014, & 2018) and Median Monthly Housing Costs are from the U.S. Census Bureau's ACS 5-Year Estimates (2010, 2014 & 2018). Additionally, Median Monthly Housing Costs are not adjusted for inflation. For example, Median Monthly Housing Costs for 2010 are in 2010 Dollars. This makes comparisons more accurate as FMRs are recalculated for inflation every year. 2010 FMRs are in 2010 Dollars, 2014 FMRs are in 2014 Dollars, and so forth.
The figure above illustrates the difference between HUDs Fair Market Rents (FMRs) and the Median Gross Rents for 1-Bedroom units in the respective County. FMR data is from HUD (2015, 2016, 2017, & 2018) and Median Gross Rents are from the U.S. Census Bureau’s ACS 5-Year Estimates (2015, 2016, 2017, & 2018). Additionally, Median Gross Rents are not adjusted for inflation. For example, Median Gross Rents for 2015 are in 2015 Dollars. This makes comparisons more accurate as FMRs are recalculated for inflation every year. 2015 FMRs are in 2015 Dollars, 2016 FMRs are in 2016 Dollars, and so forth.
The figure above illustrates the difference between HUDs Fair Market Rents (FMRs) and the Median Gross Rents for 2-Bedroom units in the respective County. FMR data is from HUD (2015, 2016, 2017, & 2018) and Median Gross Rents are from the U.S. Census Bureau's ACS 5-Year Estimates (2015, 2016, 2017, & 2018). Additionally, Median Gross Rents are not adjusted for inflation. For example, Median Gross Rents for 2015 are in 2015 Dollars. This makes comparisons more accurate as FMRs are recalculated for inflation every year. 2015 FMRs are in 2015 Dollars, 2016 FMRs are in 2016 Dollars, and so forth.

Figure 74: FMRs vs. Median Gross Rents for 3-Bedroom Units in Swain County

The figure above illustrates the difference between HUD’s Fair Market Rents (FMRs) and the Median Gross Rents for 3-Bedroom units in the respective county. FMR data is from HUD (2015, 2016, 2017, & 2018) and Median Gross Rents are from the U.S. Census Bureau’s ACS 5-Year Estimates (2015, 2016, 2017, & 2018). Additionally, Median Gross Rents are not adjusted for inflation. For example, Median Gross Rents for 2015 are in 2015 Dollars. This makes comparisons more accurate as FMRs are recalculated for inflation every year. 2015 FMRs are in 2015 Dollars, 2016 FMRs are in 2016 Dollars, and so forth.
The figure above illustrates the difference between HUD’s Fair Market Rents (FMRs) and the Median Gross Rents for 4-Bedroom units in the respective County. FMR data is from HUD (2015, 2016, 2017, & 2018) and Median Gross Rents are from the U.S. Census Bureau’s ACS 5-Year Estimates (2015, 2016, 2017, & 2018). Additionally, Median Gross Rents are not adjusted for inflation. For example, Median Gross Rents for 2015 are in 2015 Dollars. This makes comparisons more accurate as FMRs are recalculated for inflation every year. 2015 FMRs are in 2015 Dollars, 2016 FMRs are in 2016 Dollars, and so forth.
According to the North Carolina Housing Coalition, the average renter today in Swain County can afford to pay $552 worth of rent each month which is $42 above Median Monthly Housing Costs (North Carolina Housing Coalition, 2019d). This $552 value is also $213 above and only $18 below the Median Gross Rents of 1-and-2-bedroom rental units, respectively (U.S. Census Bureau, 2018a). For comparison, the rent individuals are able to afford in Robeson County is $95 above and $101 below the Median Gross Rents of 1-and-2-bedroom units, respectively (U.S. Census Bureau, 2018a). This seems to indicate that Swain County renters may have more money available for housing related expenses.

While Swain County is more “affordable” according to these data points, there is still concern for those specifically living in single unit apartments. Median Gross Rent for 1-Bedroom units in Swain County is $339, which is $256 below the FMR for a 1-Bedroom unit. This difference is the largest of all four selected counties and may indicate less than adequate housing conditions.

Accessing basic needs associated with housing such as utilities, food, and transportation, particularly for those who are disadvantaged, is difficult as well. Like previous counties, without assistance, an individual employed at minimum wage would have to work roughly 63 hours a week to pay for rent alone at a 1-Bedroom apartment that is deemed safe and adequate, or, set at the Fair Market Rent price of $595 (NLIHC, 2019c). This illustrates how expensive basic needs may be for individuals with unstable employment or low wages. But, as will be discussed in subsequent sections, American Indians may not have as low of wages in Swain County in comparison to others. Additionally, the costs of some basic necessities may not be as burdensome as they are in the other three counties.

The average family in Swain County spends roughly 4 percent of their monthly income on energy-related costs which means that average families are not burdened with energy costs (Figure 76) (North Carolina Housing Coalition, 2019d). But, for renters and owners that are low-income, monthly income spent on energy costs jumps to roughly 10 percent which would be classified as unaffordable (North Carolina Housing Coalition, 2019d).
Relatedly, the share of cost burdened households relative to all households is 29 percent or less for all census tracts which is significantly lower when compared to other counties (Figure 77) (U.S. Census Bureau, 2018a). For the census tract encompassed within the Qualla Boundary, less than 15 percent of households are cost burdened (U.S. Census Bureau, 2018a). The Eastern Band of Cherokee Indians have access to additional federal housing funds which may be a driver for current improvements and improving affordability in the future (Congressional Research Service, 2015).
Figure 77: Share of Cost-Burdened Households by Census Tract (2018)

Source: U.S. Census Bureau 2018; Accompanying Data Table: Page 177
It is interesting to note that the number of American Indians renting their housing unit and living in mobile homes has increased in Swain County, while it remained fairly constant in the other three communities (U.S. Census Bureau, 2018a, 2014, & 2010a). In regard to rentership specifically, American Indians who may own their housing unit do not benefit economically. Median Household Value tend to be lower in census tracts with larger American Indian populations (Figure 79) (U.S. Census Bureau, 2018a)

**Figure 78: Rentership by Race in Swain County**

![Rentership by Race in Swain County](source: U.S. Census Bureau 2018a, 2014, 2010a; Accompanying Data Table: Page 178)

The illustration above depicts the percent of renters by race in the respective county. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Rentership Rate (all races) is depicted as well.
Figure 79: Median Home Values (2018)

Source: U.S. Census Bureau 2018a; Accompanying Data Table: Page 177
Figure 80: Share of Mobile Homes Relative to Total Housing Stock in Swain County

<table>
<thead>
<tr>
<th>Year</th>
<th>Mobile Homes</th>
<th>Other Housing Structures</th>
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</thead>
<tbody>
<tr>
<td>2010</td>
<td>26.30</td>
<td>73.70</td>
</tr>
<tr>
<td>2014</td>
<td>24.60</td>
<td>75.40</td>
</tr>
<tr>
<td>2018</td>
<td>27.40</td>
<td>72.60</td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau 2018a, 2014, 2010a; Accompanying Data Table: Page 179

The illustration above depicts the share of mobile homes with respect to the total housing stock in the respective county. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Mobile Home Share is depicted as well.
These increases for American Indians illustrated above (Figure 81) may account for the 17-percentage point increase in all mobile homes, regardless of race, being rented in Swain County in comparison to the 2010 ACS (Figure 83) (U.S. Census Bureau, 2018a, 2014, & 2010a). Although it may be more “affordable” to live in Swain County, more American Indians are reverting to mobile homes than before. This may lead to them being exploited in the future if the popularity of mobile homes continues to rise. For example, the values of mobile homes are lower on the Qualla Boundary and significantly lower than the values of “traditional” homes (Figure 84).
Figure 82: Share of American Indians In Mobile Homes Relative to Total American Indian Housing Stock (2018)

Source: U.S. Census Bureau 2018a; Accompanying Data Table: Page 177
Figure 83: Tenure (Rentership vs. Ownership) by Mobile Home in Swain County

The illustration above depicts the share of Renters and Owners in Mobile Home Units for the respective county. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Mobile Home Rentership percentage is depicted as well for reference.

Source: U.S. Census Bureau 2018a, 2014, 2010a; Accompanying Data Table: Page 178
Figure 84: Mobile Home Values (2018)

Source: U.S. Census Bureau 2018a; Accompanying Data Table: Page 177
Economic Statistics

In Swain County, the median household income for American Indians exceeded that of whites in 2018 ACS 5-Year Estimates (U.S. Census Bureau, 2018a). It increased by $4,000 dollars from the 2014 to 2018 ACS (U.S. Census Bureau, 2018a & 2014). While it didn’t exceed that of whites, the per capita income experienced a fairly large increase as well, increasing by $5,000 dollars (U.S. Census Bureau, 2018a & 2014). Both of these increases exceeded the Median Household and Per Capita Income increases for the state (U.S. Census Bureau, 2018a & 2014).

Figure 85: Median Household Income by Race (Adjusted for Inflation) in Swain County

The figure above illustrates the Median Household Income for whites & American Indians living in the respective County. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Median Household Income (all races) is depicted as well. Dollar Amounts for each year are adjusted for 2018 inflation.

Source: U.S. Census Bureau 2018a, 2014, 2010a; Accompanying Data Table: Page 180
Poverty rates for American Indians do remain higher than that of whites, but they have decreased by 23 percentage points from the 2010 ACS to the 2018 ACS (U.S. Census Bureau, 2018a, 2014, & 2010a). This large decrease almost puts American Indian poverty on par with white poverty.
Although total unemployment has decreased, in Halifax, Robeson, and Sampson counties, the unemployment rate for American Indians still exceeds that of whites in these communities. But in Swain County, unemployment for American Indians has decreased by roughly 12 percentage points down to an extremely low 0.7% (U.S. Census Bureau, 2018a & 2014). Not only is this lower than the unemployment rate of whites, but white unemployment has also increased (U.S. Census Bureau, 2018a & 2014). Both unemployment rates are lower and higher than the state averages respectively (U.S. Census Bureau, 2018 & 2014).
The illustration above depicts unemployment by race in the respective county. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Unemployment Rate (all races) is depicted as well.

Source: U.S. Census Bureau 2018a, 2014, 2010a; Accompanying Data Table: Page 181
Supplemental Economic Statistics

American Indians in Swain county do have worse outcomes as it pertains to educational attainment, health coverage, and computer or internet access. But for each of these indicators, disparities between whites and American Indians have steadily decreased (U.S. Census Bureau, 2018a, 2014, & 2010a). Food Stamp/SNAP usage in particular has declined and is now lower than that of whites and the state average (U.S. Census Bureau, 2018a, 2014, & 2010a).

Figure 89: No Bachelor’s Degree or Higher by Race in Swain County

The illustration above depicts the percent of residents that do not have a Bachelor's Degree or higher, by race, for the respective county. Data is from the U.S. Census Bureau’s ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Average for residents (all races) without a Bachelor's Degree or higher is depicted as well.

Source: U.S. Census Bureau 2018a, 2014, 2010a; Accompanying Data Table: Page 182
Figure 90: Food Stamps/SNAP Usage by Race in Swain County

Source: U.S. Census Bureau 2018a, 2014, 2010a; Accompanying Data Table: Page 182

The illustration above depicts the percent of residents that use Food Stamp/SNAP assistance, by race, for the respective county. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Food Stamp/SNAP Usage Rate (all races) is depicted as well.
Figure 91: No Health Insurance by Race in Swain County

The illustration above depicts the percent of residents that do not have Health Insurance Coverage, by race, for the respective county. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2014 & 2018. Health Insurance data is not available for the 2010 ACS 5-Year Estimates. The North Carolina State Average (all races) is depicted as well.

Source: U.S. Census Bureau 2018a, 2014; Accompanying Data Table: Page 183
It appears there is something driving these increases in economic prosperity for American Indians which is unique to Swain County. One possible explanation for these differences may be the presence of casinos such as the Harrah’s Cherokee Casino Resort (Bryson City, 2019). Investment in similar Appalachian resorts in and around the Qualla Boundary may also create these positive economic boosts. Federal recognition and access to additional funding likely play a large role in the improved outcomes as well.
Summary

It is apparent that large disparities exist between whites and American Indians in every constituent county. American Indians are often faced with risky and unaffordable housing options, lack the economic resources required for upward mobility, and are disconnected from digital resources. These disparities have been present in each county for the last decade, but mechanisms in Swain County may be offsetting some negative outcomes.

6. Policy & Program Analysis

Below is a list of federal, state, & local policies or programs that are most relevant to affordable housing in North Carolina, and rural communities more specifically. Although the list is not exhaustive, it does provide an overview of the purpose and shortcomings of the most common.

Fair Housing Act

The institutionalization of discriminatory practices, such as covenant clauses and exclusionary zoning, during the 20th century exacerbated racial segregation in the United States by astronomical proportions. It wasn’t until 1968, with the passage of the Fair Housing Act, that discriminatory practices would be outlawed throughout the United States (Rothstein, 2017). Although the Federal Housing Act was intended to eliminate housing discrimination and help improve economic outcomes, its implementation was flawed.

The Fair Housing Act was the last piece of civil rights legislation enacted during President Lyndon B. Johnson’s presidency. The momentum of the Civil Rights Movement allowed the bill to quickly pass through Congress. But, as a result of its swift enactment, sections of the bill were not clearly explained (Menendian, 2017). The most controversial aspect of the Fair Housing Act was HUD’s duty to administer programs that “affirmatively further fair housing” (Menendian, 2017). Other federal agencies were obligated to do the same, but a definition on what it means to “affirmatively further fair housing” was never provided (Menendian, 2017). In the decades following the Act’s passage, government entities across the United States struggled with the ambiguity of the phrase and were unsure how to proceed.
They also struggled with challenging the status quo. Fair housing enforcement often focused on individual complaints tied to intentional acts of discrimination as opposed to systemic barriers (Silverman et al, 2017). In *Hill vs. Gautreaux*, the U.S. Supreme Court determined public housing in Chicago, although “unintentional”, was economically, and subsequently, racially segregated (Menendian, 2017). The Supreme Court believed the Chicago Housing Authority should assist residents in moving into low-poverty neighborhoods; it interpreted this as an example of “affirmatively furthering fair housing” under the Fair Housing Act (Menendian, 2017). George Romney, the Secretary of HUD during the Nixon Administration, interpreted the phrase similarly and attempted to launch programs that built more affordable housing in low-poverty white communities (Menendian, 2017). The Supreme Court decision, and many others it set the precedent for, were met with severe backlash. George Romney was forced out of office by Nixon’s racially motivated political interests.

The effects of codified segregation remain burdensome for communities of color, as is evidenced by the negative outcomes of segregated American Indian communities highlighted in the Data Analysis section. Federal policymakers attempted to reverse the impacts of historically rooted discrimination with the implementation of the Affirmatively Furthering Fair Housing Rule.

**The Affirmatively Furthering Fair Housing Rule**

Almost forty years after the Fair Housing Act, in 2015, the U.S. Supreme Court’s decision in *Texas Department of Housing and Community Affairs vs. the Inclusive Communities Project, Inc.* offered clarity to the Fair Housing Act and laid the foundation for the Affirmatively Furthering Fair Housing Rule (AFFH) (Silverman et al, 2017). In this decision, the court determined any housing practice that has a disproportionately negative impact on protected classes of citizens (i.e. race, religion, sex) is in direct violation of the Federal Housing Act, even if the discrimination is unintended (Silverman, 2017). Impacted individuals would in turn be entitled to a court remedy. Similar to *Hill vs. Gautreaux*, this case came as a result of siting affordable housing almost exclusively in segregated and economically depressed communities (Silverman et al, 2017).
Following the decision, HUD, with the assistance of the Obama Administration, published the AFFH rule. The AFFH explicitly defined what it means to “affirmatively further fair housing”, what types of actions comply with this definition, and created a framework for fair housing assessment and enforcement (Menendian, 2017). Municipalities receiving HUD funds are expected to complete an Assessment of Fair Housing (AFH) every five years using federally collected data. The AFH was created after years of consultations and broad public engagements to ensure it was appropriate and as equitable as possible. The purpose of the AFH is to examine fair housing issues in respective jurisdictions, pinpoint their underlying causes, and ensure they are being addressed. When an AFH is being created, public input must be considered. In addition, the federally collected data used by municipalities is accessible to the public through an online database and mapping tool to increase transparency (Menendian, 2017). Jurisdictions that are in “non-compliance” will be asked to reevaluate their fair housing strategies or are at risk of losing funding (Menendian, 2017). The AFFH rule was applied to a handful of jurisdictions in 2016, but the number was intended to increase in the coming years.

While the AFFH intends to be equitable for communities of color, it has multiple shortcomings. As a federal policy, the AFFH was inherently limiting in terms of individuals who were able to craft a definition and framework for “affirmatively furthering” fair housing. At a state and local level, the needs in these respective communities could be drastically different. For example, the narrative of residential segregation typically revolves around Black, Hispanic, and White individuals. If the voices of American Indian communities were incorporated into policy discussions, the AFFH’s framework could look different.

Also, to create the desired equitable outcomes, it may require thousands of new housing units being built (Connolly, 2016). As referenced in previous sections, this is troubling for rural communities, where all eight of North Carolina’s American Indian Tribes are located, due to their struggles to attract housing developers. Creating equitable outcomes is increasingly difficult if additional funds are not provided with this legislation in the future. “Equitable Housing” may be built in municipalities more economically stable in comparison to North Carolina’s rural communities. If this occurs, individuals with the means may relocate to these
urban areas which could further exacerbate segregation. This is particularly worrisome to tribe members who want to remain close to their respective tribe and its cultural center.

The AFFH attempts to be transparent and accessible for community members as well, but it is ineffective at doing so. Although public involvement is required when municipalities are creating their AFH, there is no specification on how public participation should be elicited nor is it measured (Silverman et al, 2017). In addition, community members are supposed to be able to access technical assistance from HUD, if needed, while using the open-sourced database and mapping tool. But instruction on how to request technical assistance is not specified (Silverman et al, 2017). Using this data also requires internet and a computer which may be inaccessible for communities in need. In towns such as Clinton, NC, which is home to the Coharie Indian Tribe, only 58 percent of the town’s population has access to internet with at least speeds of 25 mbps (BroadbandNow, 2019). As a state, ten percent of North Carolinians do not have adequate access to broadband internet at all. Most of these individuals are also located in rural Eastern & Western North Carolina, where all eight of the state’s American Indian tribes are located. And according to data provided above in the Data Analysis section, if disaggregated by race, the lack of access is even higher for American Indians. These barriers shut out the populations most in need and reduce transparency.

Lastly, although it has been 4 years since its implementation, the Trump Administration & HUD have already indefinitely suspended the AFFH rule (NLIHC, 2019b). They proposed implementing a new “advanced version” at the beginning of 2020, but it hinders the marginal affects the original program may have had (NLIHC, 2020). Jurisdictions would be allowed to select predefined “goals”, most of which are not housing related at all, as opposed to selecting community specific problems and addressing them. Jurisdictions would also be judged on criteria that are largely unrelated to housing (NLIHC, 2020). Without this rule in place, and without it implemented correctly, it harms vulnerable populations such as American Indians.
HUD’s Low-Income Housing Tax Credits, Difficult Development Areas, & Qualified Census Tracts

The Low-Income Housing Tax Credit (LIHTC), the nation’s largest source of new & rehabilitated affordable housing developments, was created as a result of the Tax Reform Act of 1986 (HUD, 2020b). Billions of dollars in tax credits are disbursed to state entities every year which are then distributed to qualified housing developers who apply (HUD, 2020b). States use Qualified Allocation Plans (QAPs) to determine which applicants receive credits based on a “point-system” (Baum-Snow & Marion, 2009). Receiving credits helps reduce the cost of construction and attracts developers to otherwise financially risky areas.

To qualify for credits, developers must meet tenant and gross rent “test” or criteria. These tests, which are based on the Poverty Rate or Area Median Gross Income (AMGI) for the area in which a property is located, ensure units are reserved for individuals in need in addition to keeping the rents affordable (The Tax Policy Center, 2020). Developers must comply with the “tests” for at least 15 years, but they usually agree to an extended compliance period of 30 years; failure to comply results in loss of tax credits (The Tax Policy Center, 2020).

Points are added to an application and additional tax incentives are provided to developers who target Difficult Development Areas (DDAs) or Qualified Census Tracts (QCTs) (Baum-Snow & Marion, 2009). DDAs are regions that have high land, construction, and utility costs relative to AMGI among other measures such as Fair Market Rents (HUD, 2020d). QCTs are tracts where at least 50 percent of households have an income below 60 percent of the AMGI or have a Poverty Rate of at least 25 percent (HUD, 2020d). LIHTC developments in QCTs and DDAs receive 30 percent more tax credits (Baum-Snow & Marion, 2009).

Evidence indicates that LIHTCs help revitalize communities in need and increase the number of additional housing developments (Baum-Snow & Marion, 2009 & NYU Furman Center, 2017). But, for constituent counties, LIHTC properties remain sparse (HUD, 2020e). With the exception of Robeson, these counties have fewer than ten LIHTC properties each (Figure 93-96). Although each county has DDAs and QCTs, most of which are regions with large American Indian populations, this does not seem to translate in affordable housing being
constructed or revitalized. This may be in part to the land’s inability to “perc”, which will be discussed in more depth further along in this report.

There are also issues associated with the cost of applying for LIHTCs. Costs, such as legal fees, do not vary by project size. Smaller projects, like those that would presumably be located in rural areas, would be more expensive per unit in comparison to larger projects. This may serve as another disincentive for developers.

**Figure 93: Halifax County DDAs, QCTs, & LIHTCs for 2020 (Purple=QCT, Yellow=DDA)**

Adapted from: HUD, 2019 and 2020 Small DDAs & QCTs
Figure 94: Robeson County DDAs, QCTs, & LIHTCs for 2020 (Purple=QCT, Yellow=DDA)

Adapted from: HUD, 2019 and 2020 Small DDAs & QCTs

Figure 95: Sampson County DDAs, QTCs, & LIHTCs for 2020 (Purple=QCT, Yellow=DDA)

Adapted from: HUD, 2019 and 2020 Small DDAs & QCTs
Figure 96: Swain County DDAs, QCTs, & LIHTCs for 2020 (Purple=QCT, Yellow=DDA)

HUD’s Community Development Block Grants

The Community Development Block Grant (CDBG) gives states the autonomy to fund qualified projects, which includes housing related ventures, that meet their specific needs. Federal appropriations for each state are determined using a need-based formula. States must then provide money to “entitlement”, urban, and “non-entitlement”, non-urban, communities (HUD, 2020a). According to HUD, the CDBG assisted over one million people with housing improvements and 33 million people with public improvements respectively from 2005 to 2013 (Urban Institute, 2017b).

Despite its benefits, it has been cut significantly like many other assistance programs which has reduced its efficacy. It currently receives $3 billion of the federal budget compared to $15 billion in the 1970s, an 80% reduction (Urban Institute, 2017b). Additionally, since its funding is appropriated, the amount a state gets every year changes and affects continuity of affordable housing projects.
Outside of funding, the formula used to disburse funds is inadequate and has negative impacts on rural and American Indian communities. 70 percent of CDBG funds are for entitlement, or urban areas, while 30 percent is for smaller municipalities (Urban Institute, 2017b). Because of budget cuts and the entitlement/non-entitlement structure, studies have shown that the CDBG’s ability to meet need in regions that are most distressed has diminished (Urban Institute, 2017b).

HUD does not have stringent monitoring policies or requirements for the CDBG either. 70 percent of acquired CDBG funds have to benefit low to moderate income individuals, but municipalities self-report and there are no mechanisms in place to ensure these funds are being used efficiently (Urban Institute, 2017b). There are no requirements that dictate where within a municipality these funds should go. The CDBG is intended to increase autonomy, but officials may disburse it inappropriately as a result.

For example, they may use 70 percent of the funds in a low-income neighborhood, but there may be another community within their jurisdiction that has been overlooked for multiple years that is doing just as bad, if not worse, economically. Communities may be getting assistance in the form of employment support programs, but they may also have a more pressing need related to housing access. But, again, due to the programs structure, there is no way to determine if the funds are being used to target these areas of most need.

The CDBG can be valuable, but changes to the program would need to be implemented to have a larger impact.

The Neighborhood Stabilization Program

The Neighborhood Stabilization Program (NSP) was created shortly after the 2008 financial crisis to help offset the burden of negative housing outcomes (HUD, 2020c). Grants that were provided by the NSP could be used to purchase and redevelop abandoned or foreclosed homes and residential properties (HUD Exchange, 2020). These grants were given to state and local governments and a selection of private or non-profit organizations. Unfortunately, no funds have been allocated to the NSP and no new grants have been provided since 2010 (HUD Exchange, 2020). There are governments and organizations, that are still using
the grant money they received a decade ago, but projects have been in the works for many years and funds would presumably be set aside for them.

Self-Help Credit Union is one of those organizations, but they already have housing developments planned. Also, in accordance with their initial application, their sole project in North Carolina is for Durham specifically (Self-Help Credit Union, 2020). If the program was ever revitalized, there would be an opportunity to not only have local and state governments apply for the program, but to partner with organizations such as Self-Help to assist American Indian communities.

**USDA Rural Housing Service, Section 515, & Section 502**

The USDA’s Rural Development Office provides housing assistance to rural communities through its Rural Housing Service (NLIHC, 2018). The Section 515 Rural Rental Housing program provides affordable housing to individuals & families who are “moderate income” or below, elderly, or have disabilities (NLIHC, 2018). Loans are provided directly from the USDA to developers to build or renovate affordable housing (NLIHC, 2018). Each loan has an interest rate of one percent and developers are forbidden to pay-off, or prepay, their loan for at least 20 years which keeps the property affordable (NLIHC, 2018).

The most recent data are provided below for the number of 515 developments in each constituent county. It is important to note that the number vacant units listed are not solely vacant affordable units. According to the dataset, many of the 515 developments in each county have additional units that are listed at market price. The number of vacant affordable units may be smaller than the actual number provided (USDA, 2020a).
The USDA also has the Section 502 Homeownership Loan program which allows families to purchase their own single-family unit (National Housing Law Project, 2020). The USDA will provide low-interest loans directly to families in need who are too high-risk to receive money from private lending institutions, or they will guarantee loans made by private lending institutions to high-risk home applicants (National Housing Law Project, 2020). With this program, some families may not have to make a down-payment and will have the entire price of the home covered by the loan. 502 applicant data for each selected county is provided below (USDA, 2020b).

The USDA is a major source of assistance in many constituent communities, but there are issues associated with its programs. More specifically, Section 515. Section 515 has been cut by more than 95 percent in recent history and over 80 percent of Section 515 developments will have their loans mature by 2025 (NLIHC, 2019a & Smart Growth America, 2020). Because of this there is a large possibility that thousands of properties will be re-priced to unaffordable market...

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**Figure 97: Number of 515 Developments by County**

<table>
<thead>
<tr>
<th>County</th>
<th>515 Developments</th>
<th>Affordable Units</th>
<th>Vacant Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Halifax</td>
<td>16</td>
<td>347</td>
<td>9</td>
</tr>
<tr>
<td>Robeson</td>
<td>25</td>
<td>792</td>
<td>25</td>
</tr>
<tr>
<td>Sampson</td>
<td>9</td>
<td>254</td>
<td>7</td>
</tr>
<tr>
<td>Swain</td>
<td>2</td>
<td>44</td>
<td>3</td>
</tr>
</tbody>
</table>

*Source: USDA, 2020a*

**Figure 98: Number of American Indian 502 Applicants by County**

<table>
<thead>
<tr>
<th>County</th>
<th>All 502 Applicants</th>
<th>American Indian Applicants</th>
<th>% American Indian</th>
</tr>
</thead>
<tbody>
<tr>
<td>Halifax</td>
<td>296</td>
<td>48</td>
<td>16.22</td>
</tr>
<tr>
<td>Robeson</td>
<td>127</td>
<td>50</td>
<td>39.4</td>
</tr>
<tr>
<td>Sampson</td>
<td>97</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Swain</td>
<td>21</td>
<td>2</td>
<td>9.52</td>
</tr>
</tbody>
</table>

*Source: USDA, 2020b*
rents. In addition, no new rental properties have been built with Section 515 since 2011 (NLIHC, 2019a). With no properties being added to the housing stock, many existing properties are in desperate need of renovation to remain livable. But it would require $112 billion over the next 20 years, in addition to the programs current operating costs, to do so (NLIHC, 2019a).

Although Section 502 has not encountered as many issues as Section 515, it is important to note that not every family may be in a position to take on the responsibility of owning a home. Also, as data shows above, homes owned by American Indians tend to be lower in value and/or are manufactured. Owning homes may not lead to wealth generation, and, in some instances, may actually be a net liability as opposed to an asset.

Lastly, building a new home, if necessary, with Section 502 assistance would be difficult if not impossible in low-lying rural areas due to the land’s inability to “perc”. All land on which a home is built must pass a percolation test which determines how much and how quickly soil can absorb liquid (Building Advisor, 2020). The land must pass the test in order for a septic system to work properly, otherwise, a home cannot be constructed. This is problematic for American Indian tribes in particular since most are located in North Carolina’s clay-rich Coastal Plains Region. Soil with a high clay content does not absorb much liquid which exponentially increases the likelihood of clay-rich land failing the “perc” test (Building Advisor, 2020).

**NAHASDA, The Indian Housing Block Grant, & Title VI Loan Guarantee**

HUD’s Office of Native American Programs helps oversee two main programs that offer financial assistance to federally, and a select few state, recognized Indian tribes (HUD, Office of Native American Programs). The Native American Housing Assistance and Self-Determination Act (NAHASDA) of 1996 recognized the right of tribal self-governance and tribal & federal governmental relationships (HUD, Office of Native American Programs). Under the NAHASDA, the Indian Housing Block Grant (IHBG) and the Title VI Loan Guarantee programs were created to give tribes the autonomy to meet their own respective needs (HUD, Office of Native American Programs).

Through the IHBG, funds are provided directly to tribes or their tribally designated housing entity (TDHE). The funds are used to provide low-income Indian families with housing
assistance via new construction, improvements, payment assistance and rehabilitation among others (HUD, Office of Native American Programs).

The Title VI Loan Guarantee allows Indian tribes to secure private capital from lending institutions for affordable housing related activities (i.e. construction or rehabilitation) in the instance they are unable to secure private capital without a guarantee (HUD, Office of Native American Programs). Similar to the USDA’s Section 502, Title VI guarantees that the federal government will pay 95% of unpaid balances and interest to private lenders in the event of default (HUD, Office of Native American Programs).

All four of constituent Indian Tribes highlighted in this report are recipients of the IHBG and the Title VI Loan Guarantee. This is a useful tool to leverage, but, as with any governmental program, it is prone to budget cuts and the financial assistance offered may continue to dwindle.

For context, funding for the Bureau of Indian Affairs (BIA), the entity which is primarily responsible for providing the Nation’s federally recognized tribes with federal services, declined by $6 million yearly from 1975 to 2000 (U.S. Commission on Civil Rights, 2003). In 2006, the Bush Administration cut the budget allocation for the BIA by $110 million (Minority Rights Group International, 2009). For the 2019 fiscal year, federal funding for all programs serving tribes and Native American communities, decreased by 9% in comparison to FY2018 (Department of Interior, 2019). This percentage is misleading since it is the average of all programs. Some programs, such as those housed in the Department of Labor, experienced budget cuts exceeding 80% (Department of Interior, 2019). Private sector “solutions” have and continue to serve as the primary means of improving American Indian well-being and “offsetting” the decline in funding, albeit ineffectively.

Additionally, it is unclear if all eight of North Carolina’s American Indian Tribes have access to IHBG funds and the Title VI Loan Guarantee. If not, this puts certain tribes at more risk than others.
Enterprise’s Rural and Native American Programs

The organization Enterprise Community Investment has a Rural and Native American Program (RNAP), which provides funding, training, and technical assistance as it pertains to affordable housing, to rural and American Indian communities (Enterprise Community Partners, 2020). Their top priorities are preserving existing affordable housing and improving access to homeownership for American Indians (Enterprise Community Partners, 2020). Various types of organizations can apply for grants to assist in affordable housing provision (Enterprise Community Partners, 2020). Although beneficial, like many private entities, the financial requirements of large projects well exceed what they are able to provide. For context, Enterprise recently awarded over $1.3 million in grant money to 27 different organizations (Enterprise Community Partners, 2020). Building one multi-unit development would presumably cost more than the entire amount Enterprise is able to provide during a typical grant cycle.

Minors Trust Fund, aka “Big Money”, & Per Cap Checks

The Minors Trust Fund, or “Big Money”, and “Per Cap” checks are a means of establishing economic stability for EBCI tribe members. Its creation stemmed from the passage of President Reagan’s Indian Gaming Regulatory Act (IGRA) in 1988 (EBCI Treasury Division, 2019 & Oakley, 2001). As referenced above, Regan, and subsequent Presidents, cut funding for federally recognized tribes and believed that private-sector solutions should be used to improve economic development and well-being (Littledaye, 2019).

After initial negotiations with the state of North Carolina in 1994, the EBCI was allowed to own and operate slot machines and other casino-style games on the Qualla Boundary (Department of Interior, 2019). Plans for a small “temporary” casino were soon enacted. Joyce Dugan, a former Tribal Chief, suggested every member should receive a cut of the casino’s profits if one were to be built in order to receive some form of benefit (Lapowsky, 2017). The tribal council agreed to this proposition and portions of the casino’s profits were to be distributed equally amongst members. The EBCI opened their first casino in 1995 and “Per Cap” checks quickly followed (Lapowsky, 2017).
While this “temporary” casino was in operation, the presiding Chief and the tribal council elicited proposals from gambling enterprises to build and operate a large “permanent” casino on the Qualla Boundary (Oakley, 2001). At the time of discussions, Cherokee land was within 500 miles of over half the nation’s population, and within 200 miles of approximately 14 million individuals which made Western North Carolina a perfect location for such ventures (Oakley, 2001). And with no other casinos in North Carolina, the Cherokee casino would operate essentially as a monopoly (American Casino Guide, 2020).

After tumultuous discussions and the ousting of a handful of tribal leaders due to unethical behavior, Harrah’s agreed to a five-year casino management contract with the EBCI. Harrah’s would get 27.5 percent of profits in the first year of operation and this percentage would drop to 17 percent during the fifth year (Oakley, 2001). The remaining profits, 72.5 and 83 percent respectively, would go directly to the EBCI. After five years, the Cherokee would have full control over the casino (Oakley, 2001). Harrah’s also agreed to donate $400,000 a year to Cherokee educational programs (Oakley, 2001). They also guaranteed the EBCI $1 million in profits every month for the first year. Harrah’s took on the responsibility of building the casino in its entirety which equated to a $100 million investment (Oakley, 2001). Lastly, the Cherokee gaming ordinance, which was created alongside the casino, established that 50 percent of profits would go to “Per Cap” payments and the Minors Trust Fund for children under the age of 18 (Oakley, 2001). The remaining 50 percent of these profits are spent on housing, higher education, and infrastructure across the Qualla Boundary (Littledaye, 2019 & Lewis, 2017).

The EBCI has renewed its management agreement with Harrah’s multiple times over the last two decades. The EBCI remains the sole owner of the Harrah’s Cherokee Casino and currently receives over 96 percent of the casino’s $300 million annual profits as a part of the most recent agreement (McKie, 2017). The remaining 4 percent goes to Harrah’s which is significantly lower than the 27.5 percent during the casino’s first year of operations.

In terms “Big Money”, registered Cherokee children receive a percentage of Harrah’s profits which are put into their respective trust fund annually. Once a child turns 18 and graduates from high school, they are eligible to receive an initial allotment of $25,000 from their respective account (EBCI Treasury Division, 2019). At age 21, they are eligible for another
$25,000 (EBCI Treasury Division, 2019). They receive any remaining monies from their respective fund at the age of 25 (EBCI Treasury Division, 2019). Additionally, after a members’ 18th birthday, they receive biannual per capita, or “Per Cap”, checks the remainder of their life (Littledaye, 2019).

“Big Money” and “Per Cap” checks have continued to grow in size as Harrah’s Cherokee Casino has become more profitable. For context, initial “Big Money” and “Per Cap” payments were around $20,000 and $1,000 respectively. They now exceed $100,000 and $7,000 each (Littledaye, 2019).

Since its inception, there have been multiple changes to the program with the most recent coming in 2019. This change allowed for early “Big Money” disbursement to purchase housing. Individuals in need of housing may not have been able to do so even if they had money in their “Big Money” account because of its staggered disbursement periods (Kays, 2019). As a result, the Tribal Council agreed to change the disbursement structure which allowed for members to purchase housing, “not to exceed 98 percent of the home’s purchase price or 80 percent of the beneficiary’s account balance at the time of a request.” (Kays, 2019). Payments are made directly to the seller of the home. This change allows for housing stability and additional wealth accumulation if a home is purchased.

The biggest issue with “Big Money” and “Per Cap” checks is the lack of federal recognition for the state’s seven remaining tribes which limits transferability of this approach. Additionally, even for the EBCI, there are problems with the monopoly it has over gambling. As time has progressed, states and localities have become more lenient with regards to gambling (Littledaye, 2019). If wide-sweeping legislation is passed that allows state-sanctioned gambling, the Eastern Band of Cherokee Indians would likely lose their monopoly in and around the areas they reside. If more casinos exist, the efficacy of a Minors Trust Fund and Per Cap checks dwindles. This is currently being considered by the EBCI and they are, although not very successfully, trying to diversify their economy to lighten the blow of such a potential shock (Lewis, 2017).
NC Housing Finance Agency

The North Carolina Housing Finance Agency helps finance affordable housing projects across the state. They offer low-cost home mortgages, similar to the USDA, finance rehabilitation and the construction of affordable housing, as well as foreclosure prevention assistance (North Carolina Housing Finance Agency, 2019). During 2019, the organization was able to finance over 11,000 affordable homes and apartments and $2 billion worth of housing construction and rehabilitation (North Carolina Housing Finance Agency, 2019). Towns such as Jacksonville, and others, have been able to revitalize large portions of disinvested communities for low-income renters and buyers (North Carolina Housing Finance Agency, 2019). The main drawbacks with the organization are that it is not exclusively focused on rural communities. This increases the competitiveness of seeking assistance for all proposed projects across North Carolina, and inevitably increases the competitiveness between American Indian communities. This may result in the smaller and most vulnerable communities being overlooked.

7. Expert Analysis

Although there were difficulties in contacting many individuals, Jamie Oxendine, the Tribal Administrator for the Haliwa-Saponi Tribe, Marlea Whitfield, Coharie Intra Tribal Council (CITCI) Housing Coordinator, and Brian Dabson, a Research Fellow at UNC-Chapel Hill’s School of Government, were able to share some insights.

Jamie Oxendine, Haliwa-Saponi Tribe

Mr. Jamie Oxendine stated many of the issues the Haliwa-Saponi tribe encounter stem from its location relative to everything else in the state. Most parts of Halifax and Warren County, the Haliwa-Saponi Tribe being located in both, are deserts in every sense of the word. They are not near food markets, retail stores, health care facilities and lack access to adequate cellphone or internet service among others (Oxendine, 2020). As an example, Hollister, which is located in Warren County (adjacent to Halifax), only has one Dollar General within a thirty-minute radius (Oxendine, 2020). As it pertains to affordable housing in particular, the problems
above exacerbate issues such as the land’s inability to “perc”, an overabundance of mobile homes, and the lack of economic mobility or stability for residents (Oxendine, 2020).

Mr. Oxendine stated much of Eastern North Carolina is plentiful in land where homes could be built or placed upon; unfortunately, due to the clay-rich soil in these regions, the land does not “perc” which causes required septic tank systems to work improperly (Oxendine, 2020). Although there are alternative solutions to septic tanks for housing located on clay-rich soil, they have to abide by county and state specific regulations. He mentioned a friend of his who had moved to the mountains of Tennessee & North Carolina with the intentions of living off the grid in a Tiny Home. Although he wanted to use an alternative sewage system, he still had to abide by the counties regulations and subsequently had to install a “traditional” septic tank (Oxendine, 2020). This makes all types of housing difficult especially for Eastern North Carolina communities. Whether you have a mobile home or get assistance from HUD or the USDA to build a home, you will not be able to find places to put it because of the soil and sewage regulations.

This may also increase the number of mobile homes. Even if you are able to get homebuyers assistance from a federal program, you already know that mobile home communities have passed the “perc” test. Otherwise, they would not exist. Individuals will not have to spend additional time and money finding plots of land and waiting to see if it will “perc”. The percolation problem is also a deterrent for businesses which in turn impacts economic outcomes. Mr. Oxendine finds it ironic that the same land and soil which was inhabited by Indigenous people for hundreds of years without issue before colonization, is now a barrier to affordable housing for people of color today (Oxendine, 2020).

Mr. Oxendine believes there are opportunities to increase economic development in his community, which will also improve affordable housing access as well. Many people pass through Halifax and Warren County because of travel to Roanoke Rapids Lake, NC beaches, Interstate 95, and the lumber industry that is prevalent in the area. He hopes this can be leveraged in the future to capture revenue, increase investment, and improve economic outcomes (Oxendine, 2020).
**Marlea Whitfield, Coharie Tribe**

Ms. Marlea Whitfield provided a quick overview of how the Coharie are attempting to improve housing access for members and the problems that exist in their communities. With the Indian Housing Block Grants they receive as a part of NAHASDA, the Coharie provide down payment, rehabilitation and emergency assistance to families in need through the Coharie Intra Tribal Council (CITCI) (Whitfield, 2020).

Their Down Payment Assistance Program provides funds, not to exceed $6,666, to families seeking housing in site-built or mobile homes (Coharie Tribe, 2020). The main stipulation with the program is that the home cannot be sold within 5 years of moving in; if the home is sold, the money must be paid back. For rehabilitation, families in need can receive funds up to $10,000 to improve the unit in which they live in (Coharie Tribe, 2020). In addition, CITCI will monitor all work to ensure it meets adequate construction standards. For emergency assistance, CITCI will provide up to $1,000 to families that are experiencing unexpected economic hardships related to septic, HVAC, plumbing, fire, and natural disaster problems (Coharie Tribe, 2020).

Ms. Whitfield stated that their programs, as well as assistance from the USDA, have addressed most tribe members housing needs from what she has seen during her experience as the Housing Coordinator (Whitfield, 2020). Similar to Mr. Oxendine, the main issue from her standpoint is finding land that is suitable for housing to be located due to perking and soil quality.

**Brian Dabson, UNC-Chapel Hill School of Government**

Mr. Brian Dabson was the lead researcher for a mobile home research project intended to help begin addressing the problems associated with mobile home usage in rural North Carolina. Although there are many problems associated with mobile homes that place residents at risk, there are opportunities to improve them and turn them into appropriate affordable housing options (Dabson, 2020). To do so, there needs to be changes in policy regulations as well as large reinvestment into the state’s mobile home stock (Dabson & UNC SOG, 2018).
According to his research, of the roughly 2,500-3,000 mobile home parks in North Carolina, a vast majority are “mom & pop” operations focused on their cashflow and often do not consider the well-being of residents (Dabson & UNC SOG, 2018). Placing uniform restrictions or revising policies that dictate the actions of landlords is a possible starting point.

Mr. Dabson also indicated that of the 481,000 occupied mobile homes in the state, almost 300,000 need to be upgraded or scrapped altogether due to their age and deteriorating conditions (Dabson & UNC SOG, 2018).

**Figure 99: North Carolina’s Mobile Home Stock**

In terms of specifics, Mr. Dabson shared some of his research findings for the project that detail what type of steps can be taken at the state and local level. Most recommendations stem from CTG Energetics, Inc.’s 2012 publication “Sustainability in Manufactured Home Communities Cost-Effective Energy, Water and Community Infrastructure Strategies to Maximize Long-Term Value” (CTG Energetics, 2012). Recommendations and possible actions that can be
taken or supported by the NC Commission of Indian Affairs are provided in the following section.

8. Recommendations

Below are recommendations based on the information and responses collected during the course of this project. Due to various research limitations that were encountered throughout the duration of the project, the list of recommendations will likely change, or be more elaborate, as the Commission of Indian Affairs continues to research into this matter in the future.

“Big Money” Replication

According to a study conducted by Duke University, which tracked Cherokee youth from 1993 through 2006, children who received “Big Money” had significantly better life outcomes (economic, housing, educational, etc.) in comparison to Cherokee children who hadn't (before “Big Money’s” inception), and non-Indian children in the Western North Carolina region (Akee et al, 2010). Additionally, adults who received “Per Cap” payments were less likely to suffer from substance abuse (Akee et al, 2010). Per Capita and Minors Trust Fund payments also allow money to be reinvested into the community when tourism to the region is low (Lewis, 2017). This helps make up for lost wages and purchases during an economic downturn.

With this in mind, a Minors Trust Fund, or a similar program could serve as a powerful tool to improve life chances for other marginalized communities. But the creation of the Minors Trust Fund is unique due to the Eastern Band of Cherokee Indians federally recognized status and the accompanying power they possess with it. Other communities, such as non-federally recognized American Indian tribes, do not have the same “political” and “market” power that the EBCI does. These communities do not have sovereignty over large plots of land, and, although all tribes can own and operate certain businesses, they do not have the ability to create and own large money-making establishments like a casino. Additionally, it would be tough, if not impossible, to create a Community Benefit Agreement that forces businesses to surrender a significant portion of their profits to fund such a venture.
Creating a similar program that establishes generational wealth and housing stability would require alternative means. One possible way of doing so could be through the use of “Baby Bonds”. These bonds are fairly similar to the Minors Trust Fund, with the main difference being the financing mechanism (Darity, 2019b). While the Minors Trust Fund is financed through the Harrah’s Cherokee Casino, “Baby Bonds” would receive financial backing from a government entity or a financial institution such as Self-Help Credit Union, etc.

According to Professor William “Sandy” Darity, one of the nation’s leading researchers on “Baby Bonds”, a baby bond-esque program for other communities, such as non-recognized tribes, would need to be funded by the government and implemented at the state or federal level, with staggered payments differentiated by an individuals’ income (Darity, 2019a). The primary reason being that it helps reduce the difficulty of passing legislation. Also, due to the relatively poor economic outcomes for people of color, the bonds would be larger for individuals who identify as American Indian for example (Darity, 2019a).

Professor Darity also worries that if local communities or tribes were to fund these types of programs themselves, either through financial institutions or through taxation for example, there would be disproportionate disbursements. The Lumbee Tribe, which has over 55,000 members, would likely have more sheer “manpower” and resources to fund larger bonds while other communities, like the Waccamaw-Siouan, would struggle (Darity, 2019a). This increases segmentation amongst American Indian communities.

Professor Darity also envisioned baby bonds being supplemented with legislation that ensures every individual receives a “livable” wage (Darity, 2019a). With this considered, it makes it extremely difficult for local communities to implement baby bonds at the local level. Rural communities, like the ones North Carolina’s American Indian tribes are located in, must find funding from financial institutions as well as via businesses. But to attract businesses to these areas, rural communities often offer tax breaks or other financial incentives that reduce the likelihood of a “livable” wage being achieved for these businesses’ employees (Darity, 2019a). Professor Darity also mentioned that even if a “livable” wage policy isn’t incorporated into the implementation of a local baby bond, the efficacy would be hindered given the low
wages of those most in need (Darity, 2019a). These businesses would be unable to rival the profits of a large casino as well, meaning the bonds themselves would be relatively small.

But creating such a program at the state or federal level may prove problematic for other American Indian communities. Christina Theodorou, an expert on NC tribal affairs and American Indian asset creation, stated there is often distrust with entities outside of each respective tribe, particularly those in government (Theodorou, 2019). It is easy to understand why given the government’s historic treatment of Indigenous peoples, hence the reason programs such as these need to be created.

Even organizations such as the Commission of Indian Affairs have received pushback from state tribes. Due to possible disconnect between tribal leadership and some of the Commission’s Board members, tribes may be hesitant to invest money into or support a statewide “baby bond-esque” program administered by an agency such as the Commission (Theodorou, 2019).

Additionally, these organizations do not have authority over tribal leadership and tribal government. They can champion conversations regarding specific programs, but they cannot force tribes to do things they are not interested in (Theodorou, 2019). For context, the Commission tried to initiate conversations with the State of North Carolina and asked that land in trust be provided to the Commission on behalf of the state’s tribes (Theodorou, 2019). The conversation was dismissed by tribes’ due to their hesitancy and concerns as it relates to the Commission and other governmental agencies.

Ms. Theodorou stated “Baby Bonds” have been discussed at the tribal level, at least in the Lumbee tribe, and are a feasible option (Theodorou, 2019). As referenced above, the main concern would be finding the funding for such a program. This could come from charitable organizations such as the Z. Smith Reynolds Foundation (Theodorou, 2019). Another possible idea may be the repurposing of NAHASDA funds, if possible, to place some of it into a bond account of some sorts for future use. Or, these funds could be placed into an account that is exclusively for housing related expenses. Regardless, tribes would still have to consider sustainability with such a model.
Amy Locklear Hertel, another expert on tribal affairs who did her doctoral research on savings in tribal communities, reiterated the importance of efforts being headed by local communities (Locklear Hertel, 2019). Ms. Locklear Hertel stated it is imperative that tribes champion these efforts, and that they are culturally relevant. In her fieldwork, she states it was relatively easy to get tribal communities to invest in savings around food for example (Locklear Hertel, 2019). This was attributed to the historical and cultural significance of food and the starvation that past generations had experienced. If these efforts were done in conjunction with tribally headed entities such as the Tribal Schools in Halifax County (Haliwa-Saponi Tribe), the Boys and Girls Club in Robeson County (Lumbee Tribe), and the Indian Childcare Center in Columbus County (Waccamaw Siouan), it would be easier to get tribe members to have faith in such a “baby bond-escape” program (Locklear Hertel). Due to the breadth of such an effort, multiple entities would have to be incorporated as is. But the organizations listed above may not be the type of organizations commonly associated with economic development; regardless, they have value and are important to include.

Similarly, Ms. Locklear Hertel stated the biggest problem is finding funds for such a program. She mentioned that this program could begin at a micro-level before it is expanded into a fully functional trust fund/baby bond program. Through her research, she recalls that the Omaha Indians created a grade-based child savings program through local schools (Locklear Hertel, 2019). Omaha Indians receive money directly from their school, which is then placed into a fund, and students can spend it on things they need (i.e. clothes, food, books) (Locklear Hertel, 2019). North Carolina tribes could replicate this model and advocate that schools with large American Indian populations receive some additional funding from local and state governments for such a program.

Ms. Locklear Hertel also mentioned that the economic outcomes for American Indian children across the state continues to lag significantly behind other racial groups. Over a decade ago child poverty rates for American Indians in North Carolina exceeded 50 percent (Locklear Hertel, 2019). Although data in this report did not focus on child poverty, it is evident that poverty in general (among other variables) has not improved all that much, and in some instances has increased.
An organization such as the Commission of Indian Affairs could use this evidence to push legislators to give each tribe money. Each tribe could then operate autonomously and create a bond like fund which could be used for housing exclusively or allow recipients to use it however they may please.

With these conversations in mind, there is always the threat of resentment as well regardless of whether a similar program is done at the local or state level. This has been encountered in other American Indian communities that have tried to implement Minors Trust Fund-esque programs and is reminiscent of the debate pertaining to reparations for Black Americans (Lockhart, 2019). Frustrations stem from individuals, particularly privileged whites, who deem these communities that are receiving benefits as unworthy & undeserving, and the program is depicted as being unfair in spite of the countless injustices that have created negative outcomes (Lockhart, 2019). This would need to be addressed.

A program could also possibly exist if there is equitable representation on City and County governments that can advocate for CBAs similar to the Minors Trust Fund or Baby Bonds. For example, the Lumbee Tribe, although not federally recognized, represent a large majority of the population in Robeson County and may be able to use political will to establish a community benefit agreement if companies are interested in coming to the area (NCCIA, 2020 & U.S. Census Bureau, 2018a). This would not put the onus solely on tribes to create the programs, but the local government instead.

But again, this begs the question of what and who would come to rural North Carolina communities. It is improbable a resort would be built in these regions and these areas lack the tourism of Western North Carolina. Going off of comments made by Mr. Oxendine, all of the constituent communities in this report receive large amounts of through traffic. For example, I-95 cuts through Robeson County and many have to go through the county to get to Myrtle Beach. I-40 cuts through Sampson County and is on the way towards many North Carolina beaches. The Commission and economic development leaders in these counties can work with tribal leaders and other advocacy groups to leverage their location in the state and find ways to convert through traffic into investments. The Lumbee tribe for example is considering developing a gas station and welcome center in Robeson County to attract investment.
There is not one answer on how the Minors Trust Fund could be replicated elsewhere, and the answer for each respective community would be vastly different and complex. But it is possible. The main hurdle is advocacy and eliciting support which will be discussed more further in this document.

**Improving the Mobile Home Stock**

There are several concrete actionable steps that Mr. Brian Dabson and the UNC School of Government highlighted in their research (Dabson & UNC SOG, 2018). Actions most relevant for the Commission of Indian affairs, and other interested parties such as the NC Rural Center, Justice Center, and NC Housing Coalition, include improving energy efficiency and advocating for changes to mobile home regulations (Dabson & UNC SOG, 2018).

In regard to energy efficiency, many mobile homes become unaffordable due to their high utility costs (CTG Energetics, 2012). Leveraging funds and building coalitions to weatherize mobile homes with things such as EnergyStar appliances, proper insulation, and low-flow showers & toilets (Dabson & UNC SOG, 2018). Retrofitting mobile homes with energy efficient upgrades not only helps reduce housing costs, but it preserves the longevity of aging units as well. Making upgrades may be a cheaper first step as opposed to building new units, although that would need to be done in due time.

Regardless, extending the life of units provides the Commission and other interested parties more time to locate and acquire funding for affordable housing ventures. From an economic standpoint, weatherizing properties creates jobs for individuals who install the upgrades (Office of Energy Efficiency & Renewable Energy, 2020). For every dollar invested in weatherization, there are roughly four dollars’ worth of energy and non-energy benefits for the broader community (Office of Energy Efficiency & Renewable Energy, 2020).

Energy efficiency upgrades, depending on the type, could range from less than $100 to over $1,000 per household (Dabson & UNC SOG, 2018). Due to the sheer number of mobile homes in American Indian communities, this would be fairly costly. But there are various organizations and programs that assist in financing efficiency upgrades. The North Carolina Weatherization Program, and its 29 subsidiaries across the state which help serve all 100
counties, offer financial assistance to low-income individuals or families who need energy efficiency upgrades and other improvements (Benefits.gov, 2020). Roanoke Electric Cooperative and Duke Energy are two entities within the state that have energy efficiency assistance programs, Upgrade to Save and Helping Home respectively, that finance upgrades as well (Dabson & UNC SOG, 2018). There are also national programs, such as the Next Step Network, which has financial assistance opportunities and partners with mobile home retailers, such as Clayton Homes in North Carolina, to ensure that individuals who do need to relocate to a new unit are receiving one that meets or exceeds EnergyStar ratings (Dabson & UNC SOG, 2018 & Next Step, 2020). Federal and state funding, whether it be from NAHASDA, the USDA, or HUD, could possibly be repurposed for energy efficiency upgrades. If energy efficiency upgrades are not permissible use of these funds, pressure would need to be placed on state and federal legislators to think about the large benefits associated with weatherization.

In terms of advocacy, the Commission should also push for legislation that makes mobile homes both safe and energy efficient moving forward. Mr. Dabson indicates four main priorities to ensure this is accomplished (Dabson & UNC SOG, 2018). To begin, there should be minimum housing standards for mobile homes similar to what other states, such as Alabama, have in place (Alabama Manufactured Housing Commission, 1987). Although mobile homes must meet minimum HUD Code requirements, they still fall short of EnergyStar ratings (CTG Energetics, 2012). According to CTG Energetics, less than 1% of all mobile homes on the market are built to EnergyStar standards (CTG Energetics, 2012). The second priority is the need to implement flood zone standards, elevate households, and encourage permanent foundations (Dabson & UNC SOG, 2018). Each of these actions ensures that future mobile homes are not in flood zones, which is imperative for places such as Robeson County, and a possible contingency plan to relocate those that are in these areas. Elevating homes and having a permanent foundation help mitigate risks and allow access to additional funding (i.e. Fannie Mae, which requires homes to have permanent foundations to receive assistance funds) (CTG Energetics, 2012). The last two priorities revolve around implementing regulations for resales of mobile homes as well as having mandatory training and licensing for installers and landlords (Dabson & UNC SOG, 2018). These are intended to help protect mobile homeowners and renters who are
vulnerable due to their lack of protections and rights associated with living in said units and mobile home parks. But, with this in mind, increasing regulations may inadvertently increase costs in the future.

Further recommendations provided by Mr. Dabson and the UNC School of Government are provided in the Appendix.

**Resident Owned Communities**

Possible solutions to the risks associated with mobile home parks can be addressed via the implementation of Resident Owned Communities (ROCs). ROCs are mobile home parks owned and operated co-operatively by its residents with a democratically elected board of directors, who are also residents (ROCusa, 2020). Individuals own their mobile home unit and a share of land within the neighborhood; within a ROC, residents do not have to worry about unexpected rent increases, evictions, and can get assistance from the community for repairs and improvements (ROCusa, 2020). Most importantly, they can have their voice heard as opposed to being silenced and taken advantage of. ROCusa is a national non-profit that assists existing ROCs, mobile homeowners interested in becoming one in the future, and landlords interested in selling their park through various means (ROCusa, 2020). ROCusa supports over 250 ROCs in the United States currently, yet none of the ones in which they support are located in Southeastern United States (ROCusa, 2020).
Outside of ROCusa, it does not appear that there are any other Resident Owned Communities other than Pine Hill Park which an elderly mobile home community in Western North Carolina (Pine Hill Park, 2020). The North Carolina Manufactured and Modular Homebuilder Association (NCMHA) has attempted to start discussions with mobile home park landlords about the possibility of ROCs, but there has been little, if any, success in doing so (Dabson, 2018). There have also been efforts and discussions of implementing ROCs in the PODER Emma Community, located in Asheville, and communities owned by Time Out in Robeson County (Poder EMMA Community Ownership, 2019 & Moore, 2019). PODER Emma does not appear to have been able to implement a ROC, and, from conversations with Dani Moore of the NC Justice Center, it appears that the efforts in Robeson County have been met with harsh resistance from Time Out (Moore, 2019). Additionally, due to the amount of money Time Out has at its disposal to counteract ROC efforts, it will be an expensive battle.

Considering that North Carolina has the 3rd largest number of mobile homes, regardless of race, in the United States, the benefits of ROCs could be wide spreading and improve the well-being of hundreds of thousands in the state (U.S. Census Bureau, 2018a). Since most mobile home park landlords are self-interested, there would need some form of an incentive to
entice them to sell their parks to residents or provide residents capital necessary to purchase the park outright. As referenced earlier, the Commission and other organizations should determine if funds are acquired through the federal government, or institutions such as the NC Housing Finance Agency, can be repurposed or used as incentives to get landlords to sell their parks. There is also the possibility of tax incentives, such as those offered by the LIHTC, that could be implemented to encourage sales or implementation. As another example, Mr. Dabson and the UNC School of Government proposed that the state spend more of its CDBG funds on housing. Instead of housing in general, that could be used to incentivize the creation of ROCs (Dabson, 2018).

Tiny Homes

Tiny homes are fully functioning micro dwelling units that are typically 400 ft or less and have increased in popularity as a possible solution to the affordable housing crisis (Barrie & Dohler, 2019). Because they are smaller in size, the construction costs may be lower than that of a traditional home or apartment. And because of their lower costs, they can remain affordable with the use of LIHTC and Section 8 Vouchers (Barrie & Dohler, 2019). Tiny homes are classified as efficiency units for Fair Market Rent purposes, which means the voucher limits are smaller in size in comparison to larger units. Because Tiny Homes are already “affordable”, public housing agencies may not have to provide as many vouchers to individuals. If this occurs, PHAs can reinvest those savings for families who need larger vouchers (i.e. a 1, 2, 3, or 4-bedroom unit) (Barrie & Dohler, 2019).

There has been research into tiny home communities or villages, multiple dwellings on a small or modest plot of land, in North Carolina. NC State conducted thorough research and designed an action plan for constructing a tiny home community in Durham for homeless veterans in particular (Barrie & Dohler, 2019). There is also an active example of a tiny home community in Chatham County called The Farm at Penny Lane which is for individuals with mental health conditions (Barrie & Dohler, 2019 & The Farm at Penny Lane, 2020). The community has 15 units on a 40-acre plot and features a gym, laundry rooms, courtyards, a community garden, and a clubhouse (Barrie & Dohler, 2019 & The Farm at Penny Lane, 2020).
Tiny Home villages could be replicable for American Indian communities with appropriate funding from corporate, federal, and philanthropic support. Although development of a Tiny Home village plan for American Indian communities is out of the scope of this research, it would presumably be inexpensive in comparison to finding funding for other affordable housing projects.

It is important to note that, while they can be an option to address affordable housing issues, they do present their own set of unique problems. The largest problem are zoning laws and regulations in municipalities (Steele, 2020). Tiny Homes are often either Accessory Dwelling Units, tiny homes with a permanent foundation and water/sewer connection, or recreational vehicles, tiny homes that are mobile and have wheels for transport (similar to mobile homes) (Steele, 2020). Because of these classifications, it is difficult for these projects to come to fruition. Depending on the county, accessory dwelling units or recreational vehicles may not be allowed at all on any available piece of land, including land that is being rehabilitated for a possible Tiny Home community. The Farm at Perry Lane was able to work around zoning laws and regulations because UNC-Chapel Hill, owners of the community, were able to classify it as rehabilitation/treatment facility (Barrie & Dohler, 2019). There may not be any work arounds or exceptions that would be applicable for American Indian communities and would likely require a change in zoning laws for counties and the state.

Tangentially, there are many issues related to density (Matthews, 2016). Although the homes may be cheap to construct, it is best to use a little land to support as many people as possible, hence multistory apartment complexes (Matthews, 2016). Although land is not as sparse as it is in urban areas, Tiny Homes may end up taking up most suitable land (i.e. land that will “perc”) if zoning ordinances are relaxed. These suitable plots of land may also be significantly more expensive.

Tiny Homes may still leave a critical mass of people, especially families, in need of housing. Regardless, they should be pursued further as possible solutions particularly for young people or elders in 1-2 person households.
Advocacy Efforts

Most of the recommendations above will only work if advocacy and coalitions are built with other entities that are interested in improving the well-being of North Carolina’s most vulnerable populations. Many of the issues outlined in this report cut across identities, and the more voices bringing attention to them, the increased likelihood of change occurring.

Some issues can only be addressed via advocacy and policy change. Funding to address affordable housing exists; the United States has the money to do so, but some of the stipulations associated with federal and state funds have to be relaxed to address the crisis in the most effective way possible. There also needs to be more spending on affordable housing, for rural areas in particular, as opposed to cutting budgets. This exacerbates existing problems and will eventually manifest itself in other negative ways that will reverberate throughout our society.

For this particular effort, there is a unique opportunity to elicit the economic differences between Swain County, the EBCI and the remaining American Indian Tribes. The fact that there is a federally recognized tribe and seven-state recognized tribes serves as a case study of sorts. Varying outcomes show the positive impacts of additional funding, in this case via tribal recognition, on economic indicators such as housing. These differences are by no means a “no-sum game” in which the EBCI receives less assistance from the federal government or the Commission, nor does it mean they do not have outcomes that are in many ways worse than other identity group and don’t need assistance. All American Indian tribes need assistance to counteract the long history of supremacy, oppression, and discrimination. This is simply an opportunity to approach the inevitable funding barriers in a different manner moving forward.

And some problems will not be addressed with money at all. For example, alternative sewage disposal means exist and have existed for many years, but the codes must be changed for them to be implemented. Tiny homes could serve as an affordable housing solution, but they cannot be built due to zoning laws. The Neighborhood Stabilization Program could be used to purchase vacant lots or vacated properties, and in conjunction with other programs, could increase the stock of adequate and affordable housing, but funds must be allocated by the federal government. Lastly, it may be more fruitful to address low wages & incomes as opposed to increasing the affordable housing stock. Recent studies have indicated negative economic
outcomes, like the ones discussed in the Data Analysis section, may be the root cause of the crisis as opposed to a limited supply (Ghent, 2020).

**Interim Financing Options**

While advocacy will open doors to additional financing opportunities, there are possible funding options that the Commission could take advantage of on behalf of the state’s tribes or encourage them to do so on their own currently. According to Enterprise’s website, the Lumbee tribe and/or Robeson County has already received grant assistance from their Rural and Native American Program (Enterprise Community Partners, Inc, 2020). The North Carolina Housing Finance Agency could help if it has not been used before. There are also corporate organizations, such as Home Depot and their Community Impact Grant, that offer community financial assistance for the purpose of rehabilitating affordable housing. These interim options do not address long-term needs, but they may address urgent needs in American Indian communities while this work continues.

9. **Next Steps**

Research for this project was impaired due to the COVID-19 Pandemic which heightened already present limitations. Moving forward, the Commission should consider these limitations and address this reports shortcomings. Limitations are covered in more detail below.

**Affordable Housing Recipients**

A major barrier to research is attributed to the Institutional Review Board (IRB) and accompanying requirements necessary for approval. Although an application was not needed to interview housing & tribal professionals, such as local Public Housing Agencies (PHAs) or Tribal Administrations, one was required to interview affordable housing recipients. Explicit approval from each respective American Indian Tribal Administration and/or Government was needed to proceed, but there were severe difficulties in making contact with necessary persons due to scheduling conflicts, inability to make contact, and more pressing internal issues that respective tribes needed to address. Outreach spanned three to four months to no avail, and
difficulties were further exacerbated by the COVID-19 Pandemic. This resulted in affordable housing recipient interviews being dropped altogether.

Individuals who utilize affordable housing resources are key for adequate analysis in future research. They offer a different perspective and their responses may be more candid in comparison to individuals who work at governmental entities. Since the Commission of Indian Affairs has existing relationships with tribal leaders and tribe members, making contact may not be as difficult. Also, the Commission may not have the same review process that universities and their accompanying research centers must abide by. This may reduce the time it takes to initiate interviews in the future.

Interview topics for these individuals should focus on the benefits of assistance, hardships, and personal experiences in their respective county, among others. A full list of possible questions can be found in the Appendix.

**Public Housing Agencies**

Interviews must be conducted with employees at PHAs in targeted counties as well. Employees offer insight on current mechanisms and barriers to affordable housing provision in their county. Their responses may capture information that is not visible in descriptive statistics. Similarly, more Tribal Leaders must be incorporated into the research. Although many American Indian communities are similar in structure, not all claims for a particular community are extrapolatable.

As referenced above, there were severe difficulties in contacting tribal administrations. These difficulties also existed for PHAs, likely due to the fact that many agencies have large caseloads. In some cases, agencies offer services to multiple counties and micropolitans. I suspect many agencies may have dealt with more claims, layoffs, and reduced staff sizes in light of COVID-19. Outreach should occur.

For future research, interviews with Tribal Leaders & PHAs should cover the topics of outreach, hardships, possible improvements, and the impacts of federal & state policies among others. A full list of possible interview questions can be found in the Appendix.
10. Conclusion

The Commission of Indian Affairs must continue its advocacy for American Indian populations and use data in this report to support its efforts. There are means of temporarily offsetting issues disproportionately affecting American Indians. But it is unrealistic to expect major improvements without structural changes to policies and mechanisms that keep marginalized communities in socioeconomically disadvantaged positions. Substantial change cannot occur without appropriate governmental support.

Federal, state, and local policymakers take an oath to serve all of their constituents, yet American Indians continue to be invisible citizens. Their voices fall on deaf ears and their issues remain hidden in plain sight. The United States has been an oppressor since its inception, and the responsibility for improving or eliminating disparate outcomes must not rest solely on the shoulders of the oppressed. The North Carolina Commission of Indian Affairs is in an extremely unique position to help push forth the conversation and promote solutions, both large and small, that address housing needs. With the Commission’s current efforts, future legislation and political dialogue revolving around affordable housing provision and improving outcomes for American Indians, and people of color more generally, could change forever.
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Appendix A

Locations of North Carolina’s American Indian Tribes
### Appendix B

#### Data Tables

**Percent American Indian**

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</tr>
</thead>
<tbody>
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<td>5.66</td>
<td>4.94</td>
<td>39.43</td>
<td>39.62</td>
<td>41.09</td>
<td>2.46</td>
<td>2.73</td>
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<td>30.26</td>
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<tr>
<td>NC % American Indian</td>
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<td>1.95</td>
<td>1.96</td>
<td>1.84</td>
<td>1.95</td>
<td>1.96</td>
<td>1.84</td>
<td>1.95</td>
<td>1.96</td>
<td>1.84</td>
<td>1.95</td>
<td>1.96</td>
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</tbody>
</table>

The table above depicts the proportion of American Indians in each respective county. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2010, 2014, & 2018. The NC State Average is depicted as well.

**Fair Market Rents (FMR) vs. Median Monthly Housing Costs**

<table>
<thead>
<tr>
<th></th>
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<tbody>
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<td>537</td>
<td>570</td>
<td>572</td>
<td>608</td>
<td>628</td>
<td>6362</td>
<td>465</td>
<td>481</td>
<td>510</td>
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<tr>
<td>FMR 1-Bedroom</td>
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<td>605</td>
<td>507</td>
<td>489</td>
<td>514</td>
<td>499</td>
<td>513</td>
<td>544</td>
<td>490</td>
<td>538</td>
<td>595</td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>FMR 2-Bedroom</td>
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<td>637</td>
<td>695</td>
<td>588</td>
<td>637</td>
<td>683</td>
<td>588</td>
<td>637</td>
<td>683</td>
<td>588</td>
<td>728</td>
<td>683</td>
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<td></td>
<td></td>
<td></td>
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<tr>
<td>2-Bedroom Difference</td>
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<td>-43</td>
<td>3</td>
<td>51</td>
<td>67</td>
<td>111</td>
<td>-20</td>
<td>9</td>
<td>47</td>
<td>123</td>
<td>247</td>
<td>173</td>
<td></td>
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<td></td>
</tr>
<tr>
<td>FMR 3-Bedroom</td>
<td>748</td>
<td>830</td>
<td>932</td>
<td>706</td>
<td>808</td>
<td>862</td>
<td>817</td>
<td>860</td>
<td>943</td>
<td>771</td>
<td>907</td>
<td>856</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3-Bedroom Difference</td>
<td>112</td>
<td>150</td>
<td>240</td>
<td>169</td>
<td>238</td>
<td>290</td>
<td>209</td>
<td>232</td>
<td>307</td>
<td>306</td>
<td>426</td>
<td>346</td>
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<tr>
<td>FMR 4-Bedroom</td>
<td>858</td>
<td>1,124</td>
<td>1,107</td>
<td>786</td>
<td>981</td>
<td>987</td>
<td>1,035</td>
<td>989</td>
<td>1,004</td>
<td>898</td>
<td>1,098</td>
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<td>4-Bedroom Difference</td>
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<td>444</td>
<td>415</td>
<td>249</td>
<td>411</td>
<td>415</td>
<td>427</td>
<td>361</td>
<td>368</td>
<td>433</td>
<td>617</td>
<td>684</td>
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</tbody>
</table>

The table above illustrates the difference between HUD's Fair Market Rents (FMRs) and the Median Monthly Housing Costs in the respective County. Only Fair Market Rents (FMRs) for 1-Bedroom through 4-Bedroom Units are accounted for as FMRs for Efficiency Units are similar to that of 1-Bedroom Units. FMR data is from HUD (2010, 2014, & 2018) and Median Monthly Housing Costs are from the U.S. Census Bureau's ACS 5-Year Estimates (2010, 2014 & 2018). Additionally, Median Monthly Housing Costs are not adjusted for inflation. For example, Median Monthly Housing Costs for 2010 are in 2010 Dollars. This makes comparisons more accurate as FMRs are recalculated for inflation every year. 2010 FMRs are in 2010 Dollars, 2014 FMRs are in 2014 Dollars, and so forth.
Fair Market Rents (FMR) vs. Median Gross Rents by Bedrooms

<table>
<thead>
<tr>
<th></th>
<th>Halifax</th>
<th>Robeson</th>
<th>Sampson</th>
<th>Swain</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2015</td>
<td>2016</td>
<td>2017</td>
<td>2018</td>
</tr>
<tr>
<td>Median Gross Rent 1-Bedroom</td>
<td>430</td>
<td>388</td>
<td>383</td>
<td>436</td>
</tr>
<tr>
<td>FMR 1-Bedroom</td>
<td>534</td>
<td>548</td>
<td>568</td>
<td>605</td>
</tr>
<tr>
<td>1-Bedroom Difference</td>
<td>104</td>
<td>160</td>
<td>185</td>
<td>169</td>
</tr>
<tr>
<td>Median Gross Rent 2-Bedroom</td>
<td>609</td>
<td>642</td>
<td>668</td>
<td>688</td>
</tr>
<tr>
<td>FMR 2-Bedroom</td>
<td>645</td>
<td>648</td>
<td>662</td>
<td>695</td>
</tr>
<tr>
<td>2-Bedroom Difference</td>
<td>36</td>
<td>6</td>
<td>-6</td>
<td>7</td>
</tr>
<tr>
<td>Median Gross Rent 3-Bedroom</td>
<td>810</td>
<td>812</td>
<td>817</td>
<td>803</td>
</tr>
<tr>
<td>FMR 3-Bedroom</td>
<td>841</td>
<td>846</td>
<td>861</td>
<td>932</td>
</tr>
<tr>
<td>3-Bedroom Difference</td>
<td>31</td>
<td>34</td>
<td>44</td>
<td>129</td>
</tr>
<tr>
<td>Median Gross Rent 4-Bedroom</td>
<td>849</td>
<td>893</td>
<td>850</td>
<td>919</td>
</tr>
<tr>
<td>FMR 4-Bedroom</td>
<td>1,138</td>
<td>989</td>
<td>1,026</td>
<td>1,107</td>
</tr>
<tr>
<td>4-Bedroom Difference</td>
<td>289</td>
<td>96</td>
<td>176</td>
<td>188</td>
</tr>
</tbody>
</table>

The table above illustrates the difference between HUD's Fair Market Rents (FMRs) and the Median Gross Rents for units in the respective County. FMR data is from HUD (2015, 2016, 2017, & 2018) and Median Gross Rents are from the U.S. Census Bureau's ACS 5-Year Estimates (2015, 2016, 2017, & 2018). Additionally, Median Gross Rents are not adjusted for inflation. For example, Median Gross Rents for 2015 are in 2015 Dollars. This makes comparisons more accurate as FMRs are recalculated for inflation every year. 2015 FMRs are in 2015 Dollars, 2016 FMRs are in 2016 Dollars, and so forth.
Cost-Burdens & Median Home Values in Halifax County (2018)

<table>
<thead>
<tr>
<th>Census Tract</th>
<th>Total Households</th>
<th>Households With Housing Costs More Than Thirty Percent of Income</th>
<th>Percentage of Households That Are Cost-Burdened</th>
<th>Median Value of &quot;Traditional&quot; Homes</th>
<th>Median Value of Mobile Homes</th>
</tr>
</thead>
<tbody>
<tr>
<td>9301</td>
<td>1,402</td>
<td>400</td>
<td>29</td>
<td>76,600</td>
<td>N/A</td>
</tr>
<tr>
<td>9302</td>
<td>2,215</td>
<td>663</td>
<td>30</td>
<td>148,100</td>
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</tr>
<tr>
<td>9303</td>
<td>1,749</td>
<td>657</td>
<td>38</td>
<td>108,500</td>
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</tr>
<tr>
<td>9304</td>
<td>1,352</td>
<td>500</td>
<td>37</td>
<td>85,400</td>
<td>N/A</td>
</tr>
<tr>
<td>9305.01</td>
<td>1,504</td>
<td>502</td>
<td>33</td>
<td>119,100</td>
<td>48,800</td>
</tr>
<tr>
<td>9305.02</td>
<td>2,219</td>
<td>628</td>
<td>28</td>
<td>92,300</td>
<td>N/A</td>
</tr>
<tr>
<td>9306</td>
<td>1,791</td>
<td>243</td>
<td>14</td>
<td>65,900</td>
<td>12,300</td>
</tr>
<tr>
<td>9307</td>
<td>1,787</td>
<td>356</td>
<td>20</td>
<td>100,000</td>
<td>41,100</td>
</tr>
<tr>
<td>9308</td>
<td>2,137</td>
<td>460</td>
<td>22</td>
<td>65,200</td>
<td>30,700</td>
</tr>
<tr>
<td>9309</td>
<td>2,039</td>
<td>874</td>
<td>43</td>
<td>71,400</td>
<td>N/A</td>
</tr>
<tr>
<td>9310</td>
<td>999</td>
<td>267</td>
<td>27</td>
<td>74,900</td>
<td>47,000</td>
</tr>
<tr>
<td>9311</td>
<td>1,922</td>
<td>349</td>
<td>18</td>
<td>74,300</td>
<td>21,400</td>
</tr>
</tbody>
</table>

The table above illustrates cost-burdens & median home values in the respective County. This data is pulled from the U.S. Census Bureau's ACS 5-Year Estimates for 2018 exclusively. Dollar amounts are adjusted for 2018 inflation.
### Mobile Home Usage in Halifax County (2018)

<table>
<thead>
<tr>
<th>Census Tract</th>
<th>Total American Indian Households</th>
<th>American Indian Households Living in Mobile Homes</th>
<th>Percentage of American Indians in Mobile Homes Relative to All American Indian Households</th>
</tr>
</thead>
<tbody>
<tr>
<td>Census Tract 9301</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Census Tract 9302</td>
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<tr>
<td>Census Tract 9303</td>
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<td>0</td>
</tr>
<tr>
<td>Census Tract 9304</td>
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<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Census Tract 9305.01</td>
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<td>0</td>
</tr>
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<td>24</td>
<td>100</td>
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<tr>
<td>Census Tract 9306</td>
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<td>34</td>
<td>100</td>
</tr>
<tr>
<td>Census Tract 9307</td>
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<td>5</td>
<td>100</td>
</tr>
<tr>
<td>Census Tract 9308</td>
<td>649</td>
<td>210</td>
<td>32</td>
</tr>
<tr>
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<td>0</td>
</tr>
<tr>
<td>Census Tract 9310</td>
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<td>Census Tract 9311</td>
<td>24</td>
<td>0</td>
<td>0</td>
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</table>

The table above illustrates mobile home usage in the respective County. This data is pulled from the U.S. Census Bureau's ACS 5-Year Estimates for 2018 exclusively.
## Cost-Burdens & Mobile Home Values in Robeson County (2018)

<table>
<thead>
<tr>
<th>Census Tract</th>
<th>Total Households</th>
<th>Households With Housing Costs More Than Thirty Percent of Income</th>
<th>Percentage of Households That Are Cost-Burdened</th>
<th>Median Value of &quot;Traditional&quot; Homes</th>
<th>Median Value of Mobile Homes</th>
</tr>
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<tbody>
<tr>
<td>9601.01</td>
<td>1,351</td>
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<td>71,200</td>
<td>57,900</td>
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<td>81,300</td>
<td>54,000</td>
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<td>20</td>
<td>73,600</td>
<td>57,200</td>
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<tr>
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<td>29,500</td>
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<td>50,000</td>
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<td>31,700</td>
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<td>49,900</td>
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<td>74,300</td>
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<td>52,400</td>
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<td>--------</td>
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<td>189</td>
<td>17</td>
<td>60,400</td>
<td>54,100</td>
</tr>
</tbody>
</table>

The table above illustrates cost-burdens & median home values in the respective County. This data is pulled from the U.S. Census Bureau's ACS 5-Year Estimates for 2018 exclusively. Dollar amounts are adjusted for 2018 inflation.
### Mobile Home Usage in Robeson County (2018)

<table>
<thead>
<tr>
<th>Census Tract</th>
<th>Total American Indian Households</th>
<th>American Indian Households Living in Mobile Homes</th>
<th>Percentage of American Indians in Mobile Homes Relative to All American Indian Households</th>
</tr>
</thead>
<tbody>
<tr>
<td>9601.01</td>
<td>179</td>
<td>122</td>
<td>68</td>
</tr>
<tr>
<td>9601.02</td>
<td>284</td>
<td>63</td>
<td>22</td>
</tr>
<tr>
<td>9602.01</td>
<td>305</td>
<td>214</td>
<td>70</td>
</tr>
<tr>
<td>9602.02</td>
<td>806</td>
<td>406</td>
<td>50</td>
</tr>
<tr>
<td>9603</td>
<td>649</td>
<td>282</td>
<td>43</td>
</tr>
<tr>
<td>9604.01</td>
<td>2,129</td>
<td>1,060</td>
<td>50</td>
</tr>
<tr>
<td>9604.02</td>
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<td>49</td>
</tr>
<tr>
<td>9605.01</td>
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<td>38</td>
</tr>
<tr>
<td>9605.02</td>
<td>881</td>
<td>106</td>
<td>12</td>
</tr>
<tr>
<td>9605.03</td>
<td>525</td>
<td>188</td>
<td>36</td>
</tr>
<tr>
<td>9606</td>
<td>1,627</td>
<td>823</td>
<td>51</td>
</tr>
<tr>
<td>9607.01</td>
<td>1,040</td>
<td>477</td>
<td>46</td>
</tr>
<tr>
<td>9607.02</td>
<td>563</td>
<td>382</td>
<td>68</td>
</tr>
<tr>
<td>9608.01</td>
<td>206</td>
<td>16</td>
<td>8</td>
</tr>
<tr>
<td>9608.02</td>
<td>44</td>
<td>9</td>
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</tr>
<tr>
<td>9609</td>
<td>48</td>
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<td>0</td>
</tr>
<tr>
<td>9610</td>
<td>103</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>9611</td>
<td>122</td>
<td>21</td>
<td>17</td>
</tr>
<tr>
<td>9612</td>
<td>175</td>
<td>13</td>
<td>7</td>
</tr>
<tr>
<td>9613.01</td>
<td>281</td>
<td>72</td>
<td>26</td>
</tr>
<tr>
<td>9613.02</td>
<td>239</td>
<td>45</td>
<td>19</td>
</tr>
<tr>
<td>9614</td>
<td>268</td>
<td>151</td>
<td>56</td>
</tr>
<tr>
<td>9615</td>
<td>464</td>
<td>272</td>
<td>59</td>
</tr>
</tbody>
</table>
The table above illustrates mobile home usage in the respective County. This data is pulled from the U.S. Census Bureau's ACS 5-Year Estimates for 2018 exclusively.

<table>
<thead>
<tr>
<th>Census Tract</th>
<th>Usage 1</th>
<th>Usage 2</th>
<th>Usage Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>9616.01</td>
<td>186</td>
<td>166</td>
<td>89</td>
</tr>
<tr>
<td>9616.02</td>
<td>256</td>
<td>131</td>
<td>51</td>
</tr>
<tr>
<td>9617</td>
<td>462</td>
<td>146</td>
<td>32</td>
</tr>
<tr>
<td>9618.01</td>
<td>1,317</td>
<td>738</td>
<td>56</td>
</tr>
<tr>
<td>9618.02</td>
<td>1,066</td>
<td>519</td>
<td>49</td>
</tr>
<tr>
<td>9619</td>
<td>495</td>
<td>227</td>
<td>46</td>
</tr>
<tr>
<td>9620.01</td>
<td>404</td>
<td>200</td>
<td>50</td>
</tr>
<tr>
<td>9620.02</td>
<td>650</td>
<td>485</td>
<td>75</td>
</tr>
</tbody>
</table>
## Cost-Burdens & Median Home Values in Sampson County (2018)

<table>
<thead>
<tr>
<th>Census Tract</th>
<th>Total Households</th>
<th>Households With Housing Costs More Than Thirty Percent of Income</th>
<th>Percentage of Households That Are Cost-Burdened</th>
<th>Median Value of &quot;Traditional&quot; Homes</th>
<th>Median Value of Mobile Homes</th>
</tr>
</thead>
<tbody>
<tr>
<td>9701</td>
<td>2,470</td>
<td>507</td>
<td>21</td>
<td>80,700</td>
<td>33,200</td>
</tr>
<tr>
<td>9702</td>
<td>2,419</td>
<td>456</td>
<td>19</td>
<td>94,300</td>
<td>63,400</td>
</tr>
<tr>
<td>9703.01</td>
<td>2,374</td>
<td>476</td>
<td>20</td>
<td>92,900</td>
<td>47,100</td>
</tr>
<tr>
<td>9703.02</td>
<td>1,849</td>
<td>177</td>
<td>10</td>
<td>99,100</td>
<td>62,500</td>
</tr>
<tr>
<td>9704</td>
<td>2,081</td>
<td>321</td>
<td>15</td>
<td>78,400</td>
<td>61,000</td>
</tr>
<tr>
<td>9705</td>
<td>2,188</td>
<td>628</td>
<td>29</td>
<td>88,800</td>
<td>63,600</td>
</tr>
<tr>
<td>9706</td>
<td>1,749</td>
<td>518</td>
<td>30</td>
<td>118,800</td>
<td>30,800</td>
</tr>
<tr>
<td>9707</td>
<td>2,669</td>
<td>853</td>
<td>32</td>
<td>107,600</td>
<td>62,900</td>
</tr>
<tr>
<td>9708</td>
<td>2,472</td>
<td>641</td>
<td>26</td>
<td>89,200</td>
<td>62,700</td>
</tr>
<tr>
<td>9709</td>
<td>1,289</td>
<td>313</td>
<td>24</td>
<td>90,500</td>
<td>65,600</td>
</tr>
<tr>
<td>9710</td>
<td>1,977</td>
<td>374</td>
<td>19</td>
<td>74,300</td>
<td>42,500</td>
</tr>
</tbody>
</table>

The table above illustrates cost-burdens & median home values in the respective County. This data is pulled from the U.S. Census Bureau's ACS 5-Year Estimates for 2018 exclusively. Dollar amounts are adjusted for 2018 inflation.
Mobile Home Usage in Sampson County (2018)

<table>
<thead>
<tr>
<th>Census Tract</th>
<th>Total American Indian Households</th>
<th>American Indian Households Living in Mobile Homes</th>
<th>Percentage of American Indians in Mobile Homes Relative to All American Indian Households</th>
</tr>
</thead>
<tbody>
<tr>
<td>9701</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>9702</td>
<td>71</td>
<td>24</td>
<td>34</td>
</tr>
<tr>
<td>9703.01</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>9703.02</td>
<td>59</td>
<td>5</td>
<td>8</td>
</tr>
<tr>
<td>9704</td>
<td>12</td>
<td>12</td>
<td>100</td>
</tr>
<tr>
<td>9705</td>
<td>26</td>
<td>6</td>
<td>23</td>
</tr>
<tr>
<td>9706</td>
<td>46</td>
<td>2</td>
<td>4</td>
</tr>
<tr>
<td>9707</td>
<td>23</td>
<td>17</td>
<td>74</td>
</tr>
<tr>
<td>9708</td>
<td>115</td>
<td>32</td>
<td>28</td>
</tr>
<tr>
<td>9709</td>
<td>5</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>9710</td>
<td>57</td>
<td>50</td>
<td>88</td>
</tr>
</tbody>
</table>

The table above illustrates mobile home usage in the respective County. This data is pulled from the U.S. Census Bureau's ACS 5-Year Estimates for 2018 exclusively.
Cost-Burdens & Median Home Values in Swain County (2018)

<table>
<thead>
<tr>
<th>Census Tract</th>
<th>Total Households</th>
<th>Households With Housing Costs More Than Thirty Percent of Income</th>
<th>Percentage of Households That Are Cost-Burdened</th>
<th>Median Value of &quot;Traditional&quot; Homes</th>
<th>Median Value of Mobile Homes</th>
</tr>
</thead>
<tbody>
<tr>
<td>9401</td>
<td>1,821</td>
<td>170</td>
<td>9</td>
<td>101,100</td>
<td>53,000</td>
</tr>
<tr>
<td>9602</td>
<td>1,273</td>
<td>249</td>
<td>20</td>
<td>129,500</td>
<td>47,600</td>
</tr>
<tr>
<td>9603.01</td>
<td>1,219</td>
<td>263</td>
<td>22</td>
<td>158,100</td>
<td>75,900</td>
</tr>
<tr>
<td>9603.02</td>
<td>1,130</td>
<td>330</td>
<td>29</td>
<td>153,600</td>
<td>101,600</td>
</tr>
<tr>
<td>9802</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>

The table above illustrates cost-burdens & median home values in the respective County. This data is pulled from the U.S. Census Bureau's ACS 5-Year Estimates for 2018 exclusively. Dollar amounts are adjusted for 2018 inflation.

Mobile Home Usage in Swain County (2018)

<table>
<thead>
<tr>
<th>Census Tract</th>
<th>Total American Indian Households</th>
<th>American Indian Households Living in Mobile Homes</th>
<th>Percentage of American Indians in Mobile Homes Relative to All American Indian Households</th>
</tr>
</thead>
<tbody>
<tr>
<td>9401</td>
<td>1,301</td>
<td>309</td>
<td>24</td>
</tr>
<tr>
<td>9602</td>
<td>55</td>
<td>15</td>
<td>27</td>
</tr>
<tr>
<td>9603.01</td>
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<td>0</td>
</tr>
<tr>
<td>9603.02</td>
<td>68</td>
<td>7</td>
<td>10</td>
</tr>
<tr>
<td>9802</td>
<td>0</td>
<td>0</td>
<td>N/A</td>
</tr>
</tbody>
</table>

The table above illustrates mobile home usage in the respective County. This data is pulled from the U.S. Census Bureau's ACS 5-Year Estimates for 2018 exclusively.
### Tenure for All Housing Units

<table>
<thead>
<tr>
<th></th>
<th>Halifax</th>
<th>Robeson</th>
<th>Sampson</th>
<th>Swain</th>
</tr>
</thead>
<tbody>
<tr>
<td>% of American Indian Renters</td>
<td>40.6</td>
<td>23.8</td>
<td>27.7</td>
<td>30.0</td>
</tr>
<tr>
<td>% of White Renters</td>
<td>24.9</td>
<td>24.9</td>
<td>29.7</td>
<td>22.0</td>
</tr>
<tr>
<td>Renter Disparity</td>
<td>15.7</td>
<td>-1.1</td>
<td>-2.0</td>
<td>8.0</td>
</tr>
<tr>
<td>% of American Indian Owners</td>
<td>59.4</td>
<td>76.2</td>
<td>72.3</td>
<td>70.0</td>
</tr>
<tr>
<td>% of White Owners</td>
<td>75.1</td>
<td>75.1</td>
<td>70.3</td>
<td>78.0</td>
</tr>
<tr>
<td>Owner Disparity</td>
<td>-15.7</td>
<td>1.1</td>
<td>2.0</td>
<td>-8.0</td>
</tr>
<tr>
<td>% of NC Renters (All Races)</td>
<td>31.9</td>
<td>34.2</td>
<td>35.0</td>
<td>31.9</td>
</tr>
<tr>
<td>% of NC Owners (All Races)</td>
<td>68.1</td>
<td>65.8</td>
<td>65.0</td>
<td>68.1</td>
</tr>
</tbody>
</table>

The table above depicts the percent of renters by race in the respective county. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Rentership Rate (all races) is depicted as well.

### Tenure for Mobile Homes

<table>
<thead>
<tr>
<th></th>
<th>Halifax</th>
<th>Robeson</th>
<th>Sampson</th>
<th>Swain</th>
</tr>
</thead>
<tbody>
<tr>
<td>% of Renters In Mobile Homes</td>
<td>34.24</td>
<td>38.33</td>
<td>27.68</td>
<td>34.18</td>
</tr>
<tr>
<td>% of Owners in Mobile Homes</td>
<td>65.76</td>
<td>61.67</td>
<td>72.32</td>
<td>65.82</td>
</tr>
<tr>
<td>NC % of Renters in Mobile Homes</td>
<td>33.81</td>
<td>36.54</td>
<td>36.70</td>
<td>33.81</td>
</tr>
<tr>
<td>NC % of Owners in Mobile Homes</td>
<td>66.19</td>
<td>63.46</td>
<td>63.30</td>
<td>66.19</td>
</tr>
</tbody>
</table>

The table above depicts the share of Renters and Owners in Mobile Home Units for the respective county. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Mobile Home Rentership percentage is depicted as well for reference.
## Share of Mobile Homes Relative to Total Housing Stock

<table>
<thead>
<tr>
<th></th>
<th>Halifax</th>
<th>Robeson</th>
<th>Sampson</th>
<th>Swain</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Share of Mobile Homes</strong></td>
<td>21.90</td>
<td>20.80</td>
<td>21.90</td>
<td>38.60</td>
</tr>
<tr>
<td><strong>NC Share of Mobile Homes</strong></td>
<td>14.30</td>
<td>13.50</td>
<td>13.00</td>
<td>14.30</td>
</tr>
</tbody>
</table>

The table above depicts the share of mobile homes with respect to the total housing stock in the respective county. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Mobile Home Share is depicted as well.

## Percent of Residents in Mobile Homes

<table>
<thead>
<tr>
<th></th>
<th>Halifax</th>
<th>Robeson</th>
<th>Sampson</th>
<th>Swain</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>% of American Indians in Mobile Homes</strong></td>
<td>42.80</td>
<td>37.50</td>
<td>34.50</td>
<td>45.80</td>
</tr>
<tr>
<td><strong>% of Whites in Mobile Homes</strong></td>
<td>14.00</td>
<td>11.70</td>
<td>15.50</td>
<td>27.80</td>
</tr>
<tr>
<td><strong>Mobile Home Usage Disparity</strong></td>
<td>28.80</td>
<td>25.80</td>
<td>19.00</td>
<td>18.00</td>
</tr>
<tr>
<td><strong>NC % of Residents in Mobile Homes (All Races)</strong></td>
<td>13.60</td>
<td>12.90</td>
<td>12.30</td>
<td>13.60</td>
</tr>
</tbody>
</table>

The table above represents the share, or percentage, of all whites & American Indians living in Mobile Homes. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Average for residents living in Mobile Homes (all races) is depicted as well.
### Median Household Income (Adjusted for Inflation)

<table>
<thead>
<tr>
<th></th>
<th>Halifax</th>
<th>Robeson</th>
<th>Sampson</th>
<th>Swain</th>
</tr>
</thead>
<tbody>
<tr>
<td>American Indian Median Household Income</td>
<td>26,767</td>
<td>26,066</td>
<td>29,219</td>
<td>32,669</td>
</tr>
<tr>
<td>NC Median Household Income (All Races)</td>
<td>52,596</td>
<td>49,575</td>
<td>52,413</td>
<td>52,596</td>
</tr>
</tbody>
</table>

The table above illustrates the Median Household Income for whites & American Indians living in the respective County. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Median Household Income (all races) is depicted as well. Dollar Amounts for each year are adjusted for 2018 inflation.

### Per Capita Income (Adjusted for Inflation)

<table>
<thead>
<tr>
<th></th>
<th>Halifax</th>
<th>Robeson</th>
<th>Sampson</th>
<th>Swain</th>
</tr>
</thead>
<tbody>
<tr>
<td>American Indian Per Capita Income</td>
<td>16,407</td>
<td>21,951</td>
<td>21,045</td>
<td>16,021</td>
</tr>
<tr>
<td>White Per Capita Income</td>
<td>26,993</td>
<td>27,055</td>
<td>26,453</td>
<td>26,453</td>
</tr>
<tr>
<td>Per Capita Income Disparity</td>
<td>-10,586</td>
<td>-5,104</td>
<td>-5,408</td>
<td>-10,330</td>
</tr>
</tbody>
</table>

The table above illustrates the Per Capita Household Income for whites & American Indians living in the respective County. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Per Capita Income (all races) is depicted as well. Dollar Amounts for each year are adjusted for 2018 inflation.
### Poverty Rate

<table>
<thead>
<tr>
<th></th>
<th>Halifax</th>
<th>Robeson</th>
<th>Sampson</th>
<th>Swain</th>
</tr>
</thead>
<tbody>
<tr>
<td>American Indian Poverty Rate</td>
<td>27.4</td>
<td>29</td>
<td>29.1</td>
<td>28.3</td>
</tr>
<tr>
<td>White Poverty Rate</td>
<td>10.5</td>
<td>11</td>
<td>14.6</td>
<td>18.8</td>
</tr>
<tr>
<td>Poverty Rate Disparity</td>
<td>16.9</td>
<td>18</td>
<td>14.5</td>
<td>9.5</td>
</tr>
<tr>
<td>NC Poverty Rate (All Races)</td>
<td>15.5</td>
<td>17.57</td>
<td>15.4</td>
<td>15.5</td>
</tr>
</tbody>
</table>

The table above depicts poverty by race in the respective county. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Poverty Rate (all races) is depicted as well.

### Unemployment Rate

<table>
<thead>
<tr>
<th></th>
<th>Halifax</th>
<th>Robeson</th>
<th>Sampson</th>
<th>Swain</th>
</tr>
</thead>
<tbody>
<tr>
<td>American Indian Unemployment Rate</td>
<td>17.50</td>
<td>19.40</td>
<td>10.70</td>
<td>9.70</td>
</tr>
<tr>
<td>White Unemployment Rate</td>
<td>7.10</td>
<td>9.60</td>
<td>5.90</td>
<td>7.00</td>
</tr>
<tr>
<td>Unemployment Rate Disparity</td>
<td>10.40</td>
<td>9.80</td>
<td>4.80</td>
<td>2.70</td>
</tr>
<tr>
<td>NC Unemployment Rate (All Races)</td>
<td>8.80</td>
<td>10.60</td>
<td>6.30</td>
<td>8.80</td>
</tr>
</tbody>
</table>

The table above depicts unemployment by race in the respective county. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Unemployment Rate (all races) is depicted as well.
The table above depicts the percent of residents that do not have a Bachelor's Degree or higher, by race, for the respective county. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Average for residents (all races) without a Bachelor's Degree or higher is depicted as well.

Percent Without a Bachelor’s Degree or Higher

<table>
<thead>
<tr>
<th></th>
<th>Halifax</th>
<th>Robeson</th>
<th>Sampson</th>
<th>Swain</th>
</tr>
</thead>
<tbody>
<tr>
<td>% of American Indians w/ No Bachelor's</td>
<td>95.40</td>
<td>91.20</td>
<td>94.50</td>
<td>89.50</td>
</tr>
<tr>
<td>% of Whites w/ No Bachelor's</td>
<td>84.90</td>
<td>82.20</td>
<td>79.90</td>
<td>82.00</td>
</tr>
<tr>
<td>No Bachelor's Disparity</td>
<td>10.50</td>
<td>9.00</td>
<td>14.60</td>
<td>7.50</td>
</tr>
<tr>
<td>NC % w/ No Bachelor's (All Races)</td>
<td>73.90</td>
<td>72.30</td>
<td>69.40</td>
<td>73.90</td>
</tr>
</tbody>
</table>

The table above depicts the percent of residents that use Food Stamp/SNAP assistance, by race, for the respective county. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2010, 2014, & 2018. The North Carolina State Food Stamp/SNAP Usage Rate (all races) is depicted as well.

Percent Using Food Stamps/SNAP Assistance

<table>
<thead>
<tr>
<th></th>
<th>Halifax</th>
<th>Robeson</th>
<th>Sampson</th>
<th>Swain</th>
</tr>
</thead>
<tbody>
<tr>
<td>% of American Indian Usage</td>
<td>34.60</td>
<td>54.50</td>
<td>42.90</td>
<td>21.00</td>
</tr>
<tr>
<td>% of White Usage</td>
<td>9.40</td>
<td>12.10</td>
<td>13.40</td>
<td>12.90</td>
</tr>
<tr>
<td>Food Stamps/SNAP Disparity</td>
<td>25.20</td>
<td>42.40</td>
<td>29.50</td>
<td>8.10</td>
</tr>
</tbody>
</table>
Percent Without Health Insurance

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
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The table above depicts the percent of residents that do not have Health Insurance Coverage, by race, for the respective county. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2014 & 2018. Health Insurance data is not available for the 2010 ACS 5-Year Estimates. The North Carolina State Average (all races) is depicted as well.

Percent Without an Internet Subscription or Computer

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<th></th>
<th>Halifax 2018</th>
<th>Robeson 2018</th>
<th>Sampson 2018</th>
<th>Swain 2018</th>
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<tr>
<td>% of American Indians No Internet/Computer</td>
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<tr>
<td>NC % No Internet/Computer (All Races)</td>
<td>17.50</td>
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The table above depicts the percent of residents that do not have an Internet Subscription or a Computer, by race, for each respective county. Data is from the U.S. Census Bureau's ACS 5-Year Estimates for 2018. Data on Internet Subscriptions & Computer Access is not tracked in the ACS 5-Year Estimates for 2010 and 2014. The North Carolina State Average (all races) is depicted as well.
Appendix C
Brian Dabson & UNC School of Government Recommendations

ECONOMIC OPPORTUNITY THROUGH ADDRESSING THE MOBILE HOME CRISIS IN RURAL NORTH CAROLINA: STAKEHOLDERS’ WORKSHOP
North Carolina Rural Center
April 26, 2018
SUMMARY OF DISCUSSIONS

Background
The workshop was convened by the Environmental Finance Center at the UNC School of Government, with funding support from the USDA Rural Community Development Initiative. Its objectives were to:

- Recognize the critical importance of manufactured housing as the primary source of affordable housing in rural North Carolina;
- Develop strategies and action steps including tools, partnerships, and funding streams, to make large scale improvements to the manufactured housing stock; and
- Identify economic opportunities presented by these strategies and action steps, such as jobs, businesses, skills, housing affordability, community development, and investment streams.

The workshop was the culmination of a literature and data review and a series of interviews with 40 stakeholders with connections with manufactured home building, installation, maintenance, regulation, removal, resident representation, and housing policy. This research broadened the initial scope of the project from energy efficiency and disaster resilience of mobile home parks in eastern North Carolina to encompass multiple dimensions of manufactured home policy and practice that cut across jurisdictions, interests, and perspectives. To achieve any impact to match the scale of the challenge, a convening of stakeholders was considered essential.

The workshop was held at the North Carolina Rural Center on April 26, 2018 and attracted 32 participants from 25 organizations – these are listed in Appendix A. Facilitation was provided by the UNC School of Government. A summary of the proceedings follows.

1. Re-Shaping the Market
Many of the challenges associated with manufactured homes may be tackled through market shaping actions. Secondary market institutions Freddie Mac and Fannie Mae; federal agencies, primarily HUD, FEMA, and USDA Rural Development; state agencies such as NC Housing Finance Agency, Departments of Environmental Quality, Public Safety, and Insurance; banks and insurance companies; utility companies and cooperatives; and local governments, through their policies and practices can impact all aspects of the manufactured home sector. Such actions may include manufacturing and design standards, Energy Star compliance, installation and siting standards including flood vulnerability, loan products and practices, and relocations. Innovations such as tiny homes and temporary ‘drop and recycle’ homes for the elderly can also be encouraged. Some changes can be brought about through awareness of successful efforts elsewhere through networks such as Prosperity Now, NeighborWorks, and Next Step. Other changes may be enabled through advocacy by organizations as diverse as the Manufactured & Modular Homebuilders Association, North Carolina Housing Coalition, North Carolina Justice Center, and North Carolina City and County Management Association, which when working together may effectively influence legislation and funding allocations.

2. Regulation, Enforcement, and Certification
There is value in reviewing the regulations and rules that govern the manufacture, sales, installation, relocation, and maintenance of manufactured homes to ensure that there is a proper balance between
affordability and safety. This will involve engaging with the Manufactured Homes Consensus Committee which advises on HUD regulations, the US Department of Energy on energy efficiency standards, the NC Departments of Insurance, Public Safety, and Environmental Quality, and local governments on planning and zoning, and code enforcement. Although such a comprehensive review would be a lengthy and potentially contentious process, there are four priority areas for action: (1) the introduction of statewide minimum housing standards for all homes (including manufactured homes) on the lines of the Alabama Manufactured Home Commission Administrative Code 535-X-10 (1987), (2) the introduction of flood zone standards that require manufactured homes to be elevated to increase freeboard height above flood level, and for better and safer zoning away from flood-prone and other hazardous areas; (3) the regulation of resales (including on-line) of manufactured homes; and (4) mandatory installer training, licensing, and bonding, with independent installation inspections.

3. Energy Efficiency and Safety
There is no shortage of ideas for improving the energy efficiency and safety of new and existing manufactured homes – and there is good evidence to show the substantial utility costs savings from appropriate efficiency measures. Roanoke Electric Cooperative’s ‘Upgrade to Save’ and Duke Energy’s ‘Helping Home’ are two approaches that represent novel ways of funding improvements, and bridging gaps in federal/state weatherization and emergency repair programs. The challenge is that there are insufficient public funds available to meet the demand. There is also the reality that spending on energy efficiency may be wasted if there are structural or other problems with the homes, or if they are sited in areas vulnerable to floods and high winds. The Community Rating System used by the National Flood Insurance Program could be a useful incentive for local government action on flood mitigation measures, coupled with incentives for whole communities to be EnergyStar certified. Changing behaviors of owners and tenants may bring substantial benefits using smart technologies to monitor and adjust electricity usage and pre-paid programs and regular maintenance. In addition, better training for weatherization and repair/upgrade contractors, based on curricula such as those developed by Advanced Energy, can ensure that work is carried out efficiently and effectively.

4. Comprehensive Improvements to Manufactured Home Parks
The ownership of manufactured home parks and communities are of three types: the investor-owned parks or REITs (including YES! which owns 15 communities in North Carolina), large local investor or family parks, and smaller ‘mom and pop’ operations. Among the 2,600 parks (number to be verified) in the state, ‘mom and pop’ operations predominate, which tend to be cash flow businesses with little margin for investments in infrastructure and home upgrades. The sale and disposal of parks places homeowners and tenants at risk. Across the country, initiatives such as transferring park ownership to resident owner cooperatives, nonprofit agencies, and land trusts are underway, and there is some evidence to show that these increase community stability and investment. Tax incentives to encourage donations of parks, flexible use of federal funds (HUD, FEMA), greater cooperation between utilities, local governments, and state agencies, and re-dedication of state CDBG funds to housing may all be helpful.

5. Home Occupant Counseling and Education
Counseling and education for potential and existing owners and tenants will give them better protection from financial exploitation and help them to be better stewards of their homes. This will include information and understanding of the implications of ownership and tenancy in terms of financing, responsibilities, energy efficiency, and essential maintenance. The production of an owner/tenant’s home maintenance manual, similar to the one Habitat for Humanity provides, could be an effective tool.
The arrival of Next Step in North Carolina will be a boost to these efforts, as will working with the network of National Foundation for Credit Counseling (NFCC) agencies, of which there are 24 in North Carolina.

6. Decommissioning of Abandoned Homes

The estimated 100,000 abandoned homes in North Carolina, with a further 200,000 homes that are in such poor condition that they need to be replaced, represents a formidable challenge with financial, operational, public health, and environmental implications. There is already legislation and funding in place through HB 1134 (2008), “An Act to protect public health and the environment by encouraging counties to develop plans that provide for the deconstruction of abandoned manufactured homes and the removal of reusable or recyclable components, by providing for the abatement of abandoned manufactured homes that are determined to be a nuisance, and to designate that a portion of the Solid Waste Trust Fund be used to fund the deconstruction and removal of abandoned manufactured homes.” Up to $1 million annually is available for this purpose through 2023. An immediate step is to establish how this fund has been used since its inception in 2009, and to identify obstacles to its implementation. In addition, further work is needed to identify opportunities for standardizing rules, fees, and enforcement across the state.

Engaging Other Players

Although there was diverse representation of interests at the workshop, there were several players that need to be engaged. These include the hospital and health systems who are required to conduct community health needs assessment and invest in actions that target the social determinants of health. The documented health issues associated with poor quality manufactured homes make these systems potentially important partners. Others identified include Clayton Homes (the nation’s largest manufactured home builder with a substantial presence in North Carolina), appraisers, North Carolina Building Code Council, the Department of Motor Vehicles (responsible for registration of manufactured homes not affixed to permanent foundations), the insurance industry, and national and regional banks.
Appendix D
Brian Dabson & UNC School of Government Helpful Mobile Home Resources

IMPROVING MANUFACTURED HOUSING STOCK: 10 Examples to Consider

AT THE COMMUNITY LEVEL

1. Family Promise of Grand Rapids

2. Millenium Housing, California

3. Habitat for Humanity, Charlottesville, VA

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Partners in Housing, Grand Rapids, Michigan

Family Promise of Grand Rapids, Michigan is a faith-based organization focused on the needs of homeless families. One of its programs, Partners in Housing, restores manufactured homes to provide affordable places for families. Using community volunteers, manufactured homes can be remodeled for about $8,500 in 4-6 weeks. Once a family moves in, it receives title to the home, and pays the lot rent of around $450 per month. Over 100 homes have been remodeled in this way, financed by cash and donated items.

Millenium Housing, California

Millenium Housing is a California nonprofit that acquires and rehabilitates mobile home communities. The goal is to ensure that these communities remain a valuable source of affordable housing, provide enhance maintenance and services, and give a greater role for residents in budget and management decisions. Millenium Housing owns 15 communities, comprising 4,500 households and over 10,000 residents. Another nonprofit, SPARC, provides a range of services and programs to the residents of these and other lower income mobile home communities, including school supplies, disaster preparedness classes, health fairs, food banks, lunch programs, scholarships, home repairs, after school activities, and fitness classes. Millenium Housing has access to tax-exempt municipal revenue bonds based on income from the property.

Habitat for Humanity, Charlottesville, VA

In 2007, Habitat bought Southwood Mobile Home Park, a 141-unit community of 1500 people. To date, $79 million has been invested in Southwood along with efforts to build trust, stabilize and preserve the community for existing residents, address deferred maintenance issues, create leadership capacity among the residents, and provide a range of social, educational, and health services. A collaborative visioning and planning process has led to proposals for progressive redevelopment to replace the mobile units with 700-800 site-built homes without displacement of current residents. Albemarle County became a formal partner in early 2018, committing $675,000 to begin the first phase of redevelopment.

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UNC SCHOOL OF GOVERNMENT
Environmental Finance Center
IMPROVING MANUFACTURED HOUSING STOCK:
10 Examples to Consider

AT THE STATE/REGIONAL LEVEL

4 Vermont Energy Investment Corporation

Mobile Home Replacement Program - Vermont Energy Investment Corporation
VEIC is a 30-year nonprofit dedicated to reducing economic and environmental costs of energy use. A collaboration with the state Housing & Conservation Board and philanthropy led to the design of a zero energy modular home that can fit on existing mobile home park lots. The homes feature high performance, double-wall construction with superior insulation, advanced air-source heating and cooling, and triple-pane windows. Vermont has built over 50 such homes in the state. Many other companies are now offering a range of zero energy homes.

5 Upgrade to Save - Roanoke Electric Cooperative, NC

Roanoke Electric Cooperative, based in Aulander, NC, offers its members a no-debt, on-bill financing option for investments in cost-effective energy efficiency upgrades. An average investment of $7,400 for weatherization and HVAC replacement yields net savings to the customer of $60 per month. Of the 100 projects funded to date, over a third are for manufactured homes. Criteria include post-1982, sited on own land, and permanent foundations. Approval is not based on income or household circumstances.

6 Helping Home - Duke Energy & NC Community Action Association

Helping Home is Duke Energy’s program aimed at 700 customer-households with an income at or below 200% of US poverty levels. Following an energy assessment, services include up to $3,000 for health and safety repairs such as insulation, handrails, minor roof, plumbing leaks and electrical repairs; up to $2,000 for appliance replacement; and up to $800 for heating and cooling system repair. The fund is a joint initiative with the NC Community Action Association.
IMPROVING MANUFACTURED HOUSING STOCK: 10 Examples to Consider

AT THE NATIONAL & MULTI-STATE LEVEL

ROC USA
ROC USA is a nonprofit social venture that has been promoting and supporting resident ownership of manufactured home communities since 2003. The ROC USA Network comprises nine regional nonprofit affiliates, and a CDFI lending subsidiary, working with 200 communities in 16 states (none in the Southeast), in a resident-owned community (ROC), homeowners form a cooperative, which owns the land and manages the business that is the community. Members continue to own their own homes individually and an equal share of the land beneath the entire neighborhood. Benefits include control of monthly lot rent, community repairs and improvements, lifetime security against unfair eviction, liability protection, and a strong sense of community. One ROC in Pasadena, Texas, a 105-site park obtained financing to make improvements to drainage and storm water management, which saved them from flooding during Hurricane Harvey.

Next Step® Network - SmartMH™
Next Step is a nonprofit housing intermediary, based in Louisville, KY, focused on affordable home ownership opportunities through manufactured housing. It provides training and consultation to mission-driven nonprofit organizations, helping educate staff about factory-built housing, foster development projects using factory-built housing, and develop awareness of the benefits of factory-built housing to community stakeholders. Homes placed through nonprofit partners are built to meet or exceed ENERGY STAR standards and are installed on FHA Title II permanent foundation. Next Step® Network and Freddie Mac announced in January 2018 the expansion of their SmartMH™ program of financial education and brokerage to North Carolina, which includes partnership with 27 Clayton Homes retail stores in the state.

PROSPERITY NOW
I'M HOME Network
I'M HOME, a program of Prosperity Now, promotes manufactured housing as a safe, affordable path to financial stability. I'M HOME Network provides technical assistance, policy development, scholarships, and networking to organizations across the country. Self-Help is a member of the network. Prosperity Now has developed a Manufactured Housing Toolkit comprising communications tools, policy briefs, resource guides, sample local-level policies, and data and policy snapshots.

Community Rating System - National Flood Insurance Program
The National Flood Insurance Program (NFIP) is the federal flood insurance program in communities that comply with minimum standards for floodplain management. To encourage communities to go beyond the minimum and reduce flood risk, the NFIP’s Community Rating System offers discounts on flood insurance premiums. Communities earn credit points for carrying out a range of activities to better inform the public about flood risk and what can be done to mitigate it, to improve mapping and regulations for zoning and construction, and to reduce flooding through planning, mitigation, relocation, public works, and proper maintenance.
IMPROVING MANUFACTURED HOUSING STOCK: How much will it cost?

ABANDONED HOMES
There are thousands of abandoned manufactured homes across the state. These homes pose environmental and public health risks. Deconstruction and disposal of these homes varies depending on location, but costs generally include permitting, landfill fees, and labor.

Permitting
$0 - $100

Landfill Charges
Flat fee per section or per ton

Deconstruction
Average: $3,360
Range: $1,900 - $5,000
Metro: $4,000 - $10,000

Sources:
Hometown Demolition Contractors, 2018 and JunkDoctors of Raleigh, 2018

ENERGY EFFICIENCY UPGRADES
Many existing manufactured homes are inefficient, creating high energy costs. Relatively small investments in energy efficiency can go a long way to improve these homes. Investing in energy efficiency leads to savings for residents and presents opportunities for job creation in the local community.

Less than $100
- Low-flow showerhead
- Roof shading from landscaping
- Replace air filter
- Exterior window shading

Over $1,000
- Energy Star furnace
- Heat pump water heater
- Install storm windows
- Insulate ceiling and walls

Highest cost-savings: reduce air leakage, heat pump water heater, Energy Star refrigerator, exterior window shading.

Sources:
CTG Energetics, Inc. 2012

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Environmental Finance Center
IMPROVING MANUFACTURED HOUSING STOCK: How much will it cost?

OTHER IMPROVEMENTS

**Safety upgrades**
Roof upgrades to withstand high winds, thicker decking, stronger fasteners, sealed deck joints, and heavier roofing felt. For a typical 2,000 sq. ft. roof, these cost:
Additional $400 - $500

Source: Insurance Institute for Business & Home Safety, 2017

**Infrastructure Improvements**
Elevate home above flood level (depending on soil condition, age of home, etc.): $7,000 - $16,000
Septic tank replacement: 3,000 gallon tank including labor: up to $8,000

Source: FEMA, 2018

**Cost of New Manufactured and Modular Homes**
Energy Star home on permanent foundation:
Singlewide: $75,000-$80,000
Doublewide: $85,000 - $130,000

Source: Clayton Homes, 2018

Modular home:
Singlewide: $140,000 at $86.85 per sq. ft ($55 - $87)

Source: Wanderbuilt, 2018

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THE PEOPLE

Manufactured Homes are Family Homes
Families of all kinds live in manufactured homes, which make up 12.6% of all NC households.

1,309,817
people live in manufactured homes
12.6% of NC population

480,739
Households live in manufactured homes
- Married Couples (40%)
- Single Parent (34%)
- Non-Family (18%)
- Live Alone (26%)
- Two-person (31%)
- Three or more people (41%)

THE HOMES

Hidden in Plain Sight
Mobile homes are an often overlooked, but vital part of North Carolina’s affordable housing stock.

There are
590,302
MANUFACTURED HOMES
in North Carolina
They comprise 13% of the state’s total housing stock

$52,400
Median Value

Opportunity for improvement
There is a unique opportunity to improve the resilience and performance of the stock of manufactured housing, which is aging and carries a high energy burden.

Proportion of manufactured homes with:
- All-electric: 50%
- Heating: Warm Air Furnace: 72%
- Cooling: Central Air Conditioning: 62%

The majority of occupied manufactured homes in NC were installed before 1999:
- 1979: 17%
- 1999: 65%
- 2009: 17%

Sources:
All data from US Census Bureau, American Community Survey 2010-2016 5-Year Estimates, except for those marked * which are from the Manufactured Housing Institute 2017, and ** US Census Bureau, Manufactured Housing Survey and US Department of Housing and Urban Development Survey of Construction.

UNC School of Government
Environmental Finance Center
### The Distribution

**An Urban - Rural Divide**
Manufactured homes are more concentrated in rural areas.

- **Proportion of manufactured homes to total housing stock:**
  - 26% in rural areas
  - 6.4% in urban areas

**Top 10 counties by number of manufactured homes**

**Top 10 counties by proportion of manufactured homes to total housing stock**

### The Pipeline

**The Market is Growing**
Manufactured housing continues to be a popular, affordable housing option.

- North Carolina ranked 6th in the nation for the number of new manufactured homes shipped (3,555)
- 80% are titled as personal property
- 34% are sited in communities (parks)
- $108
  - $57

The cost of a new manufactured home is less than half the price per square foot of a site built home.

### Sources:
All data from US Census Bureau American Community Survey 2012-2016 5-Year Estimates, except for those marked * which are from the Manufactured Housing Institute 2017, and ** US Census Bureau Manufactured Housing Survey and US Department of Housing and Urban Development Survey of Construction.
# Appendix E

Possible Interview Questions

## Tribal Leaders Interview Guide

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<tr>
<th>Themes</th>
<th>Potential Questions</th>
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| Community specific issues     | 1. How has the experience been for tribe members in search of affordable housing?  
                                | 2. Could you describe any obstacles or difficulties they’ve encountered in the process of finding housing?  
                                | 3. More generally, tell me about something in the county that makes living there difficult?  | |
| Receiving assistance          | 1. What resources or programs do you wish were available that would make the experience of finding housing for tribe members better?  
                                | 2. How do individuals become aware of affordable housing resources?  
                                | 3. Where do you see the tribe in a year (financially, overall well-being)? Or five years from now? Do you expect members to have more stable housing?  
                                | 4. Whom do tribe members talk to when they need advice about housing assistance?  
                                | 5. What local organizations would you say are culturally competent and understanding of American Indian culture and the needs of the community?  
                                | 6. Outside of tribal leadership and the Public Housing Agency, what other organizations (public or nonprofit) are supporting American Indians specifically?  
                                | 7. How do these organizations (in question 6) provide support?  
                                | 8. What leaders in the county are most supportive of people of color? |
## Affordable Housing Recipients Interview Guide

<table>
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<th>Potential Questions</th>
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| Community specific issues       | 1. How has your experience been trying to find affordable housing?  
2. Was the experience of finding housing what you expected? Why?  
3. Describe any obstacles or difficulties you’ve encountered in the process of finding housing?  
4. More generally, tell me about something in the county that makes living there difficult? |
| Receiving assistance            | 1. What resources or programs do you wish were available that would have made your experience finding housing better?  
2. How do individuals become aware of affordable housing resources?  
3. Where do you see yourself in a year? Or five years from now? Do you expect to have a more stable housing situation?  
4. Whom do you talk to when you need advice about housing assistance?  
5. What local organizations would you say are culturally competent and understanding of American Indian culture and the needs of the community?  
6. Outside of tribal leadership and the Public Housing Agency, what organizations (public or nonprofit) are supporting American Indians specifically?  
7. How do these organizations (in question 6) provide support?  
8. What leaders in the county are most supportive of people of color? |
| Background questions            | 1. How long have you lived in the area?  
2. What type of unit do you live in? Apartment or Home?  
3. How many people live with you?  
4. Does receiving housing assistance relieve the financial pressures that you may have? |
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<tr>
<th>Themes</th>
<th>Potential Questions</th>
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</table>
| Types of support requested by the community members | 1. What are all the services you offer to community members?  
2. What resources do American Indian identifying residents come to you all seeking? |
| Challenges within the American Indian community | 1. How often do you interact with American Indian residents?  
2. Tell me about a time when someone came to you all for support, but you all were unable to assist.  
3. Describe the process of what happens when an individual cannot get assistance. What resources are usually needed to prevent this from happening? |
| Other available resources within the county | 1. Where do you connect American Indians who need additional assistance?  
2. What other local organizations would you say are culturally competent and understanding of American Indian culture and the needs of the community?  
3. Outside of the PHA, what organizations (public or nonprofit) are supporting American Indians specifically?  
4. How do these organizations (in question 3) provide support?  
5. What leaders in the county are most supportive of people of color? |
| Affordable housing landscape               | 1. What data do you use to better understand the affordable housing landscape within the county?  
2. Where do you see opportunities for affordable housing developers over the next few years within the county?  
3. What are your opinions on the current landscape? |