



City of
Fond du Lac

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ASSESSMENT OF FAIR HOUSING

Establishing Fair Housing Goals and
Priorities to Inform Investments

MAY 31, 2017

About the Author

This report was produced by the Metropolitan Milwaukee Fair Housing Council, Inc. (MMFHC). Kori Schneider Peragine is the primary staff person responsible for its contents.

MMFHC was established in October 1977 as a private, non-profit organization dedicated to promote fair housing throughout the State of Wisconsin by guaranteeing all people equal access to housing opportunities and by creating and maintaining racially and economically integrated housing patterns. These goals are accomplished through four major program components: Enforcement, Outreach and Education, Fair Lending, and Inclusive Communities. MMFHC's Enforcement Program provides direct assistance to persons alleging violations of federal, state and local fair housing laws. Institutional forms of housing discrimination are also uncovered through systemic investigations conducted by the Council. Through MMFHC's Outreach and Education activities, thousands of consumers, housing providers, housing advocacy, civic and educational organizations are provided information on fair housing laws, procedures and issues in efforts to expand equal housing opportunities. MMFHC's Fair Lending Program conducts intake of mortgage rescue scam complaints, distributes fair lending materials and conducts fair lending presentations. Finally, the Inclusive Communities Program includes activities addressing affordable housing, land use, housing policy analysis.

MMFHC provides services throughout the State of Wisconsin through three offices. Its main office is located in the City of Milwaukee and satellite offices are located in Madison (Fair Housing Center of Greater Madison) and Appleton (Fair Housing Center of Northeast Wisconsin).

Table of Contents

Executive Summary	5
Community Participation Process	15
Assessment of Past Goals, Actions and Strategies	21
Fair Housing Analysis: Demographic Summary	23
General Issues: Segregation/Integration	28
Disparities in Access to Opportunity	31
Educational Opportunities	31
Employment Opportunities	35
Transportation Opportunities	37
Low Poverty Exposure Opportunities	41
Environmentally Healthy Neighborhoods	43
Patterns in Disparities in Access to Opportunity	44
Disproportionate Housing Needs	46
Publicly Supported Housing Analysis	51
Disability and Access Analysis	55
Fair Housing Enforcement, Outreach Capacity, and Resources Analysis	62
Fair Housing Goals and Recommendations	64
Appendices	67
HUD Tables	68
HUD Maps	77
Community Engagement: Stakeholder comments	97
Lending Data	101

AFH Maps

MAP 1:	Fond du Lac Percent of Affordable Renter Units
MAP 2:	Fond du Lac Percent of Households who are Renters
MAP 3:	2010 Fond du Lac Race and Ethnicity
MAP 4:	Fond du Lac School Proficiency with Race and Ethnicity
MAP 5:	Fond du Lac Labor Engagement with Race and Ethnicity
MAP 6:	Fond du Lac Transit Trips with Race and Ethnicity
MAP 7:	Fond du Lac Area Transit Bus Routes
MAP 8:	Fond du Lac Low Poverty Index with Race and Ethnicity
MAP 9:	Fond du Lac Households with Housing Cost Burden
MAP 10:	Fond du Lac Percent of Households who are Renters
MAP 11:	Fond du Lac Disability by Type (Sensory and Cognitive)
MAP 12:	Fond du Lac Disability by Type (Ambulatory, Self-care and Independent Living)

AFH Tables

TABLE 1:	Fond du Lac Tenure by Race and Ethnicity
TABLE 2:	Fond du Lac Poverty by Race and Ethnicity
TABLE 3:	Poverty Rate in Fond du Lac Public Primary Schools
TABLE 4:	Fond du Lac Educational Attainment by Race and Ethnicity – No Diploma
TABLE 5:	Fond du Lac Poverty and Employment by Race and Ethnicity
TABLE 6:	Fond du Lac Method of Transportation by Race and Ethnicity
TABLE 7:	Fond du Lac Poverty and Employment by Race and Ethnicity
TABLE 8:	Fond du Lac Demographics by Publicly Supported Housing Program
TABLE 9:	Public Housing in Fond du Lac
TABLE 10:	Fond du Lac Persons with Disabilities by Race and Ethnicity

AFH Figures:

FIGURE 1: Fond du Lac Student Achievement 2015-16 English Language Arts

FIGURE 2: Fond du Lac Transit Users

FIGURE 3: National Low Income Housing Coalition's Out of Reach Report (Fond du Lac Co.)

Executive Summary

Introduction

Millions of families across the country struggle to find safe, decent, and affordable housing. Even when such housing is available, these units may not be located in areas with access to high performing schools; good jobs; and convenient, reliable public transit options. The U.S. Department of Housing and Urban Development's (HUD) requires federal funding recipients (such as the City of Fond du Lac, the Housing Authority of the City of Fond du Lac, and the Fond du Lac County Housing Authority) affirmatively further fair housing (AFFH). Fulfilling the requirement to AFFH means taking proactive steps to address any patterns of segregation, discrimination, and disinvestment.

Data collected to compile this Assessment of Fair Housing comes from a variety of sources: stakeholder interviews, HUD-generated maps and tables, U.S. Census and American Community Survey data, Wisconsin's Department of Public Instruction, the U.S. Bureau of Labor Statistics, the National Low Income Housing Coalition's 2016 Out of Reach Report, existing City of Fond du Lac reports, WHEDA's Low Income Housing Tax Credit (LIHTC) database, DiversityDataKids.org, City and County Housing Authority data, and City ordinances.

Community Participation Process

Although an official AFH is not required of the City of Fond du Lac by HUD until 2021, both the City and MMFHC made attempts to undertake outreach activities to encourage and broaden meaningful community participation in the AFH process.

The strategy for community outreach in Fond du Lac was to conduct one-on-one interviews and gather focus group feedback. One-on-one interviews with the stakeholders were conducted throughout the AFH planning process from September 2016 to March 2017. The purpose of the interviews was to identify barriers to fair housing in the City of Fond du Lac and Fond du Lac County (the Housing Authority's jurisdiction) and better understand challenges to obtaining equal access to housing. Stakeholders consist of: representatives from organizations that work with populations that are vulnerable to unlawful discrimination, affordable housing advocates and service providers, affordable housing developers, educators, residents of public housing, and housing providers.

Assessment of Past Goals, Actions and Strategies

The City of Fond du Lac has been making progress, as measured in its Consolidated Annual Performance and Evaluation Report (CAPER) toward its fair housing goals previously identified in

its 2011 Analysis of Impediments to Fair Housing and its 2012-2016 Consolidated Plan. Those goals are:

-) Continue outreach efforts to those who may have experienced discrimination.
-) Continue to support affordable housing and multifamily housing construction through ongoing review and revision, if necessary, of the City's zoning map and other codes.
-) Continue to AFFH through activities identified in the Comprehensive Plan related to housing such as encourage developers of newly platted subdivisions to provide for entry level housing by allowing a reduction in the minimum lot area for no more than 20% of the lots in the subdivision.
-) Continue to support efforts to create a comprehensive housing counseling agency to assist tenants, housing providers and potential homebuyers with their housing issues.
-) Continue to support programs offered by the City and County Housing Authorities.
-) Continue the City's housing rehabilitation program.
-) Continue to support "United for Diversity", a local organization which promotes unity and understanding; embracing and celebrating differences among all people in the Fond du Lac area.
-) Staff will continue to monitor new zoning codes/ordinances and public policies adopted by the city to determine if there will be any impact on FH practices or affordable housing.

Fair Housing Analysis: Demographic Summary

Population growth in the City of Fond du Lac has been slow over the last two decades; however, there has been a significant shift in racial and ethnic population proportions since 1990. The white, non-Hispanic population has decreased. In 1990, white non-Hispanics comprised 97% of the City's total population; by 2010 it had dropped to 87.2%. Fond du Lac's school-age youth has greater diversity than its general population; almost 1 in 4 school-age children are racial or ethnic minorities. In the 2013-2014 school year, only 77.7% of the Fond du Lac School District's (FDLSD) student population was white, non-Hispanic.¹ In FDLSD, 10.7% of students are Hispanic; 7.2% of students are black; and 3.6% are Asian American.

¹ Wisconsin Department of Public Instruction School District Report Cards

Among people of color in Fond du Lac, the largest minority group is the Hispanic population, which comprised 7% of the total population in 2010, up from only 1.4% in 1990. (See Table below). Fond du Lac's black, Asian and Native American populations have also grown since 1990. In addition to growth in racial diversity, the City of Fond du Lac's foreign-born population increased from 1.4% of the total population in 1990 to 4.9% in 2010.

Fond du Lac Race and Ethnicity (1990-2010)

	1990	2010
White	97.0%	87.2%
Hispanic	1.4%	7.0%
Black	0.3%	2.0%
Asian	0.8%	1.7%
Native American	0.5%	0.6%

Homeownership rates by race and ethnicity vary significantly in the City of Fond du Lac. Homeownership is central to Americans' ability to accrue wealth. Homeowners' wealth over time has significantly outpaced that of renters. Whites (with a homeownership rate of 61.5%) are significantly more likely to own homes than blacks (6.3%), Hispanics (28%), Asians (12.3%) and Native Americans (17%); although the financial crisis beginning in 2008 led to a spike in foreclosures and a resulting sharp decline in the City of Fond du Lac's overall homeownership rates.

Low homeownership rates are inversely proportionate to the poverty rates. The poverty rate of blacks (36.6%) is more than four times that of whites (8.3%); Native American (23.5%) and Hispanic (24.0%) poverty rates are more than double that of whites; and Asian Americans (12.5%) have a slightly higher poverty rate than whites.

General Issues:

Segregation/Integration

The City of Fond du Lac's minority populations generally experience low levels of segregation, as measured by *dissimilarity indices of segregation*.² However, when a group's population is less than 1,000 people, dissimilarity indexes are less reliable than when assessing larger populations, and in Fond du Lac, black, Asian and Native American populations each have fewer than 1,000 individuals.

² The dissimilarity index measures the relative separation or integration of groups across all neighborhoods of a city or metropolitan area. If a city's white-black dissimilarity index were 65, that would mean that 65% of white people would need to move to another neighborhood to make whites and blacks evenly distributed across all neighborhoods.

While Fond du Lac's segregation is low according to the dissimilarity index, the northwest part of Fond du Lac, bordering North Fond du Lac, has the greatest proportion of persons of color and foreign-born persons. That is also where the greatest proportions of renters and affordable rental housing are concentrated.

Contributing factors identified that significantly create, contribute to, perpetuate, or increase the severity of segregation include:

-) Community opposition: Community opposition to affordable housing in Fond du Lac County, outside the city of Fond du Lac has limited affordable housing opportunities for people in the County.
-) Location and type of affordable housing: Renters and affordable rental housing are more concentrated in the City's center and northwest quadrant. The northwest part of Fond du Lac, bordering North Fond du Lac, has the greatest concentrations of people of color and foreign-born residents.
-) Private-market discrimination: It is difficult to assess the severity of private market discrimination in Fond du Lac based on the number of complaints reported to the Metropolitan Milwaukee Fair Housing Council, U.S. Department of Housing and Urban Development and the Wisconsin Equal Rights Division. Multiple stakeholders in Fond du Lac believe discrimination is occurring by some of the city's smaller landlords.

Disparities in Access to Opportunity:

Education

Fond du Lac public schools are performing better than the State of Wisconsin average. However, a potentially problematic relationship exists in the gap between proficient schools and where people of color reside. The schools on the east side of Fond du Lac have the highest school proficiency. West side schools have a lower school proficiency and the highest proportion of nonwhite students. Foreign-born persons of any race experience a similar pattern as nonwhites in Fond du Lac.

Data from the Wisconsin Department of Public Instruction indicates that 44% of all students tested in English Language Arts in the Fond du Lac School District scored Advanced or Proficient; 56% scored as Basic or Below Basic. When viewed along racial and ethnic lines, large disparities emerge. Only 11% of African American children scored Advanced or Proficient; 32% of Hispanic children scored Advanced or Proficient. Asian children scored slightly higher than the district with 47% scoring Advanced or Proficient. 16% of students with disabilities scored as Advanced or Proficient; 31% of economically disadvantaged kids scored Advanced or Proficient. 28% of children with limited English proficiency scored Advanced or Proficient.

Employment

According to the Bureau of Labor Statistics, Fond du Lac's unemployment rate in December of 2016 was quite low, at 3.0%. Employment rates from the 2015 American Community Survey show some racial and ethnic disparities (see table below). In particular, poverty rate disparities are of serious concern. Whites' poverty rate is 8.3%. Blacks' poverty is nearly 4.5 times that of whites; Native Americans' and Hispanics' poverty is almost 3 times and Asian Americans' poverty is 1.5 times that of whites.

Fond du Lac Poverty and Employment Rates by Race and Ethnicity

	Poverty Rate	Employment Rate
White	8.3%	92.4%
Black	36.6%	84.7%
NA	23.5%	80.2%
Asian	12.5%	97.2%
Hispanic	24.0%	89.9%

Source: American Community Survey – 2015 5-year estimates

Transportation

A key component of affirmatively furthering fair housing is the ability to conveniently get from one's home to employment and school, as well as to other community amenities and services such as libraries and parks. Lack of transportation options from one's home and neighborhood can reduce residents' access to opportunities and benefits that increase quality of life.

According to the 2015 American Community Survey, Fond du Lac residents' means of transportation to work varies significantly by race and ethnicity. For instance, 93% of whites use their car or carpool to get to work; fewer than 3% walk or use public transit. 57.5% of blacks use their car or carpool to get to work, but 42.5% walk or use transit. Native Americans, Asian Americans, and Hispanics are more likely to use a car or carpool than walk or use transit. (See Table below.)

Fond du Lac Mode of Transportation to Work by Race and Ethnicity

	car/carpool	walk/transit
White	93.0%	3.0%
Hispanic	90.7%	4.2%
Black	57.5%	42.5%
Asian	90.9%	3.1%
Native American	79.7%	20.3%

Funding for Fond du Lac Area Transit, like other transit systems nationwide, is limited. Limited funding results in limited hours and routes. According to ridership data indicating blacks are much more likely to utilize the bus transit system, these limited hours and routes are more likely to negatively impact black residents' abilities to access employment and other opportunities than other racial groups.

Low Poverty Exposure

According to HUD data, black and Hispanic groups have a greater exposure to neighborhood level poverty than whites in Fond du Lac. Additionally, the poverty rate for persons with disabilities in the city of Fond du Lac is 3 times that of persons without disabilities. Exposure to poverty has a variety of negative impacts, particularly on children's health and education.

Patterns in Disparities in Access to Opportunities

Access to educational, employment and transportation opportunities, as well as access to low-poverty and environmentally healthy neighborhoods, are essential in the provision of equal housing opportunities. Based on data presented later in this report, Fond du Lac has multiple disparities to be addressed in areas including: educational opportunities, employment opportunities, transportation opportunities, and neighborhood-level poverty exposure.

The most prominent disparities observed in this analysis are based on race and ethnicity as well as disability.

A variety of factors contribute to these disparities. One factor of particular concern in a fair housing analysis is where persons of various races and ethnicities reside. Less proficient schools, higher poverty and lower labor engagement all are more common for residents in the western census tracts, where significant numbers of people of color reside.

Contributing factors identified that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity include:

-) Lending discrimination: It is difficult to assess the severity of private market discrimination in Fond du Lac based on complaints reported to the Metropolitan Milwaukee Fair Housing Council, U.S. Department of Housing and Urban Development and the Wisconsin Equal Rights Division. Lending data specific to Fond du Lac is included in the Appendix.
-) The availability and frequency of public transportation: Many stakeholders have identified that limited routes and hours of service for the Fond du Lac Area Transit limits residents' access to employment opportunity. The bus system does not work for an employee working third shift.

-) Limited child care hours: Like the transit system, child care services are not offered for third shift or weekends. This may reduce a person's ability to obtain third shift employment opportunities.
-) Lack of cooperation from neighboring communities: Fond du Lac County communities outside the City should consider the importance of affordable housing near employment opportunities and adjust their zoning and development approvals accordingly.
-) Location of employers: Employers do not always consider where their labor force resides or whether that labor force has access to transit to get to work.
-) Location and type of affordable housing: Renters and affordable rental housing are more concentrated in the City's center and northwest quadrant. The northwest part of Fond du Lac, bordering North Fond du Lac, has the greatest concentrations of people of color and foreign-born residents.
-) Private-market discrimination: It is difficult to assess the severity of private market discrimination in Fond du Lac based on the number of complaints reported to the Metropolitan Milwaukee Fair Housing Council, U.S. Department of Housing and Urban Development and the Wisconsin Equal Rights Division and without fund for a large-scale investigation. Multiple stakeholders in Fond du Lac assert that unlawful discrimination is being perpetrated by some of the city's smaller housing providers.

Disproportionate Housing Needs

31% of Fond du Lac households experience housing problems.³ When analyzed by race and ethnicity, disparities emerge: 30.1% of white households, 43.8% black households, 47.5% Hispanic households, 37.8% Asian American households, and 66.7% of Native American households experience housing problems.

Cost burden in any amount decreases a household's housing stability. In turn, lack of housing stability can lead to homelessness, as well as health, education, and employment challenges. Severe housing cost burden, when more than 50% of household income is used for housing, is a significant problem for black households in Fond du Lac. 43.8% of black households have a severe cost burden, whereas only 12.1% of whites, 11.6% of Hispanics, 8.1% of Asian American and 0% of Native American households have a severe housing cost burden.

Contributing factors that affect how different populations experience disproportionate housing needs include:

Critical shortage of affordable housing in range of unit sizes and limited housing assistance: Housing cost burden, or spending more than 30% of income on housing costs, is a significant problem for many households in Fond du Lac, particularly African American households.

³ Housing problems include four main types: incomplete kitchen facilities, incomplete plumbing facilities, occupancy greater than 1 person per room, and cost burden greater than 30% (i.e., more than 30% of a household's income is used to pay housing costs.)

Publicly Supported Housing Analysis

Black residents of Fond du Lac are more likely to reside in public housing or use a Housing Choice Voucher than other races and ethnicities. Black residents make up just 2% of the City's population but almost 9% of public housing residents, more than 10% of project-based Section 8 residents and almost 12% of participants in the Housing Choice Voucher program.

These proportions are consistent with the high poverty rate for black residents compared to other races and ethnicities.

Fond du Lac Demographics by Publicly Supported Housing Program Category

	White		Black		Hispanic		Asian	
	supported housing	% FdL	supported housing	% FdL	supported housing	% FdL	supported housing	% FdL
Public Housing	86.4%		8.9%		1.7%		3.0%	
Project-based Section 8	82.7%		10.1%		2.9%		2.9%	
HCV Program	83.0%	87.0%	11.9%	2.0%	4.3%	7.0%	0.3%	1.7%

Contributing factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing concerns related to publicly supported housing include:

-) Lack of cooperation: Fond du Lac County communities outside the City have an inadequate supply of affordable housing near employment opportunities.
-) WHEDA's Qualified Allocation Plan (QAP): Based on its QAP, WHEDA's priority appears to be "furthering investment in blighted neighborhoods". An unintended consequence of this priority is that housing that is affordable to low and moderate income persons may become concentrated in lower-income areas of Fond du Lac. Local housing developers and other stakeholders have confirmed that the QAP plays in significant role in location of tax credit housing developments.
-) Community opposition: Community opposition to affordable housing in Fond du Lac County, outside the City of Fond du Lac, has limited affordable housing opportunities for people in the County. All communities, particularly communities with employment opportunities, need to include housing options for households with a wide range of incomes.

Disability and Access Analysis

Approximately 14% of City of Fond du Lac residents age 5 and older have a disability.

There are not enough affordable housing options for persons with disabilities. Persons with disabilities are three times more likely (31.8%) to be living in poverty than persons without

disabilities (10.5%).⁴ Therefore they are three times more likely to be in need of affordable housing than persons without disabilities.

According to local stakeholders who serve persons with disabilities, Fond du Lac has addressed many of the needs of persons with physical and sensory disabilities for supportive services; however, persons with mental illness still struggle to access some of the care they need.

Contributing factors that affect disability and access in the jurisdiction and region include:

-) Lack of affordable, accessible housing in range of unit sizes: Persons with disabilities are more likely to have low income and need low cost housing.
-) Location of accessible housing in county, outside the City: Fond du Lac County communities outside the City are also in need of affordable and accessible housing.

Fair Housing Enforcement, Outreach Capacity, and Resource Analysis

The Wisconsin Open Housing Law, [Section 106.50 of the Wisconsin Statutes](#), prohibits housing discrimination based on race, color, religion, national origin, ancestry, family status, sex, age, disability, lawful source of income, marital status, sexual orientation, and status as a victim of sexual assault, stalking and/or domestic violence.

Section 307 of the Fond du Lac Municipal Code prohibits discrimination in housing. The City's fair housing ordinance mirrors the provisions of the Wisconsin Open Housing Law.

The Metropolitan Milwaukee Fair Housing Council (MMFHC) conducts comprehensive fair housing services for the City of Fond du Lac through its Northeast Wisconsin satellite office – the Fair Housing Center of Northeast Wisconsin (FHCNW). Services include:

-) Enforcement Program - conducts intake of housing discrimination complaints, provides complainants with counseling on options for administrative or judicial remedy, and provides investigative services.
-) Outreach and Education Program - conducts fair housing presentations to consumers, advocates, and the general public; provides trainings and technical assistance for housing providers; distributes informational material and makes referrals for non-fair housing inquiries.
-) Fair Lending Program - conducts intake of mortgage rescue scam complaints, provides counseling for complainants, distributes fair lending materials and conducts fair lending presentations.
-) Inclusive Communities Program - offers technical assistance on affirmatively furthering fair housing and pro-integrative housing policies to local policymakers, housing developers and service providers.

⁴ 2015 American Community Survey, 5-year Estimates

Despite the comprehensive fair housing services provided in Fond du Lac, more can be done to enforce the fair housing laws and educate the population and housing providers of their rights and responsibilities.

Contributing factors that contribute to, perpetuate, or increase the severity of fair housing enforcement, outreach capacity, and resources and the fair housing issues include:

Lack of resources for fair housing organizations: Given that multiple levels of government have fair housing laws, and that fair housing issues reach across jurisdictional borders, the responsibility to provide and support comprehensive fair housing services rests with many entities. Funding for fair housing activities from the State of Wisconsin and the federal government have remained stagnant or even decreased over the last two decades.

Without increased funding for fair housing work, especially from the state and federal government, the ability of public agencies and private organizations (like the Fair Housing Council) to make effective progress in eliminating unlawful discrimination and creating integrated communities will be unacceptably constrained. Further, without additional investment on the part of the State of Wisconsin and the federal government, the City of Fond du Lac's ability to meet its fair housing goals will be hampered.

Fair Housing Goals and Priorities

The *goals* and *strategies* developed address the *fair housing issues* and *contributing factors* identified in this report. Fair housing goals include:

1. Expand affordable housing in high opportunity areas through inclusive strategies.
2. Increase housing opportunities for individuals with disabilities.
3. Identify opportunities for rental housing development in underserved areas of the community.
4. Support efforts to reduce racial disparities in the community.
5. Support changes to state and federal policies that impact individuals' abilities to secure housing.
6. Increase homeownership opportunities for potential homebuyers across all races and ethnicities.
7. Increase employment opportunities through community-wide partnerships that work to address barriers.
8. Continue existing funding levels and advocate for increased state and federal funding.

The City and Housing Authorities should use this section as a format for fair housing planning in future Consolidated Plans, Consolidated Annual Performance and Evaluation Reports (CAPERs), and Public Housing Authority (PHA) plans.

Community Participation Process

The strategy for AFH-related community outreach in Fond du Lac included a combination of one-on-one interviews and focus group feedback. One-on-one interviews with the stakeholders listed below were conducted throughout the AFH planning process, from October 2016 to March 2017. The purpose of the interviews was to identify barriers to fair housing in the City of Fond du Lac and Fond du Lac County (the Housing Authority's jurisdiction) and better understand the challenges posed by local housing problems. Stakeholders included: representatives from organizations that work with populations most vulnerable to unlawful housing discrimination, affordable housing advocates and service providers, affordable housing developers, educators, residents of public housing, and housing providers.

After the one-on-one interviews were conducted and a draft AFH was written, the content of that draft was presented at a community meeting. The meeting was promoted by the City of Fond du Lac, the Metropolitan Milwaukee Fair Housing Council and many of the stakeholder organizations. The meeting, held March 9, 2017, had 8 people in attendance.

Organizations consulted during the community participation process:

-) Advocap
-) Boy and Girls Club, Fond du Lac
-) Commonwealth Development
-) East Central Regional Planning Commission
-) Ebony Vision
-) Fond du Lac Aging and Disability Resource Center
-) Fond du Lac Housing Authority, Resident Advisory Board
-) Fond du Lac Literacy Services
-) Fond du Lac School District
-) The Humanity Project
-) Lakeside Gardens
-) Latino Hub
-) Legal Action of Wisconsin
-) Moraine Park Technical College, English Language Learners
-) NAMI (National Alliance on Mental Illness)
-) *Options* for Independent Living
-) Solutions Center
-) United Way
-) University of Wisconsin – Extension Fond du Lac

The one-on-one interviews are extremely beneficial in both engaging the community in the City's fair housing planning process as well as gathering information to inform the assessment of fair housing. Several stakeholders whose feedback would have been meaningful were unable to be reached.

The community meeting, conducted March 9, 2017, had 8 people in attendance, including representatives from Legal Action of Wisconsin, Fond du Lac School District, City staff and consultants, and the community at large. In general, generating high levels of attendance at community meetings is challenging. Various efforts were made to invite the public and stakeholders to the meeting:

-) Meeting notice posted in the *Reporter and Action Advertiser*.
-) Meeting notice posted on the City of Fond du Lac's webpage .
-) Draft AFH document posted on the City of Fond du Lac's webpage.
-) Meeting Notice distributed to the landlords/Fond du Lac Apartment Association, Fond du Lac Housing Coalition, local bankers, and River Park Neighborhood Group.
-) University of Wisconsin Extension promoted the meeting on its Facebook page.
-) Email with a copy of the draft AFH and meeting notice sent to all stakeholders interviewed.

Comments obtained in the community participation process:

The following are comments from stakeholders organized by topic:

Homelessness/Housing Stability:

-) Rapid rehousing is ineffective and doesn't solve real issues of homelessness. Need more PSH (permanent supportive housing).
-) HUD's definition of homelessness is a barrier.
-) Lack of housing stability - 520 evictions annually in Fond du Lac County; about 10 per week.
-) Fond du Lac Housing Authority waiting list to receive housing assistance is about 2 years.
-) About 50% of 211 (a community service help line) calls are for financial help to pay housing costs.
-) No housing options for persons reentering the community from prison.
-) Considerable transiency in Fond du Lac. Instability in housing is causing families to make a lot of moves.
-) Security deposit costs are a barrier. Many families cannot come up with these funds.
-) Criminal backgrounds are also a barrier to accessing stable housing.
-) Large families (4 or more kids) have the most difficult time accessing stable and affordable housing.
-) Single men also have challenges gaining stable housing due to gaps in services for this population.
-) 90 days is the maximum amount of time the Solutions Center can shelter their clients.

-) Major challenges to getting people into stable affordable housing include: criminal backgrounds, evictions, inadequate income, substance abuse, no driver's license, no social security cards or birth certificates.
-) NIMBYism (Not in My Back Yard) becomes apparent in attempts to secure sites for the winter warming shelters or other shelters.

Transit:

-) Limited transit routes and limited hours of service. Busses stop at 6 pm.
-) Transit is underutilized, perhaps a stigma associated with public transit.
-) The low-income residents of public housing cannot afford taxis. More busses are needed on Saturdays. Persons in wheelchairs have difficulty using busses in winter due to snow on sidewalks and curb cuts.

Housing Providers:

-)] Housing provider screening standards can be an impediment. For instance some housing providers' requirement of tenants' needing to have income three times the amount of rent can be an impediment to many low income renters.
-)] Many housing providers will not rent to homeless kids turning 18.
-)] Criminal backgrounds are also a barrier to accessing housing. No housing options for persons reentering the community from prison.

Employment Limitations:

-) Limited childcare options are barriers. Fond du Lac child care centers do not operate for all the hours that many low income families may need, like third shift and weekends.

Service Limitations:

- J "211" is a barrier. There is no obvious "front door" for persons to get into the system; or the systems entry is just not communicated effectively.
- J 211 has great potential, but needs more exposure.

Race Disparities:

- J Need for greater involvement from the black community.
- J Income disparity by race is a problem.

Attitude Barriers:

- J Prevalence of narrow-mindedness in Fond du Lac, fear of “other” kinds of people, races, and persons not from Fond du Lac. Juxtaposition with growth in persons of color with increased knowledge (social media, immediate news notifications) about crime makes many think crime is linked to people of color. While crime has decreased, people are more aware of it.
- J Persons of color have a general feeling of not being welcome in Fond du Lac, by landlords, police, and staff in businesses. An anecdote was shared that “after blacks move into Fond du Lac the police come to their home to introduce themselves”.

-) NIMBYism (Not in My Back Yard) becomes apparent in attempts to secure sites for the winter warming shelters or other shelters.

Immigration Status

-) Many English Language Learners (ELL) have a fear of law enforcement.
-) North Fond du Lac has a concentration of Latinos. There are 85 ELL in the North Fond du Lac school district.
-) Marine Credit Union will allow an ITIN for mortgage loans. ITINs (Individual Taxpayer Identification Number issued by the IRS. It allows a person to work and pay taxes, but no other benefits). One benefit of the ITIN is it allows a person to establish a record of good credit intentions.
-) Undocumented residents cannot obtain a driver's license.
-) A person's legal status is a big barrier. It affects a person's ability to be employed and get a driver's license.

Accessibility Issues:

-) Curb cuts are too steep in many intersections; many public entrances not accessible (Younkers); stores don't have enough motorized carts for persons with disabilities.
-) Infrastructure - sidewalks, curb cuts, are not always accessible.
-) Accessibility is always the biggest problem. Fond du Lac has older housing stock. Accessibility is in top 5 reasons for calls to *Options* for Independent Living.
-) Persons in wheelchairs have difficulty using busses in winter due to snow on sidewalks and curb cuts.

Mental Illness:

-) Stigma of mental illness. Prevents people from seeking help and others from understanding mental illness.
-) Ability to access mental health services. People have to wait months to see a psychiatrist in Fond du Lac. If their illness is not stable, it is harder to access housing.
-) Location of housing is limited to areas with bus service for those with no car. Most persons working with NAMI do not own a car and live downtown for proximity to mental health services, transit and affordable rents.
-) Criminal background prior to receiving treatment for mental illness is a barrier to finding housing.

Language Barriers

-) Language barriers exist in all areas of life. For example, how are the schools engaging the non-English speaking parents? Does ineffective engagement lead to educational disparities?

Additional Stakeholder Comments (excluding barriers):

Development of Affordable Housing

-) In the past, NIMBYism (Not in My Back Yard) has been encountered after a Low Income Housing Tax Credit (LIHTC) project was complete, too late for opposition within the development process. There was racialized fear from a portion of the community that believes that a local developer is advertising in Milwaukee's inner city to convince residents to move to Fond du Lac.
-) City of Fond du Lac has been a supportive partner in development projects.
-) When asked how a local developer selects their projects (as they are concentrated in a few census tracts), stakeholders indicated locations of projects are driven by Wisconsin Housing and Economic Development Authority (WHEDA) criteria.

Racial Diversity

-) When asked about perceived reasons for Fond du Lac's increase in racial and ethnic diversity over last 2 decades multiple stakeholders indicate many families are moving from Milwaukee and Chicago, looking for a safer place to raise their families.

Persons with Mental Illness

-) Resources are available for persons with physical disabilities. Mental health services, however, don't meet the need yet.
-) Good partnership with police. Police participate in the Crisis Intervention Training (CIT).

Persons with Disabilities

-) Many persons with disabilities in single family homes (disabilities occurred after already living in home).
-) Fond du Lac has been forward thinking on issues around disabilities and preventing persons with disabilities from being institutionalized, such as the Community Options Program and Family Care (allows people to remain in their home).
-) Moraine Park Technical College (MPTC) initiatives have been very forward thinking; there is a student services office for persons with disabilities.

Stakeholder Recommendations (for City, Housing Authorities and more):

-) Promote universal design in new residential construction and rehab.
-) Increase landlord outreach/education regarding reasonable accommodations and modifications.
-) Create a requirement that all public funds put into housing have accessibility requirements.
-) Increase organized advocacy by persons with disabilities.

-) Identify housing options for persons reentering the community from prison.
-) Work to expand child care options for third shift and weekends.
-) Proactively make services more accessible to non-English speaking persons in the same way accessibility is advertised for persons with disabilities.
-) Increase access to mental health services for those who need them.
-) Identify inaccessible infrastructure (such as curb cuts) and repair those areas.

Assessment of Past Goals, Actions and Strategies

Fair housing goals selected by the City of Fond du Lac and the Housing Authorities in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents

The City of Fond du Lac has been making progress, as measured in its Consolidated Annual Performance and Evaluation Report (CAPER) toward its fair housing goals previously identified in its 2011 Analysis of Impediments to Fair Housing and its 2012-2016 Consolidated Plan. Those goals are:

Continue outreach efforts to those who may have experienced discrimination.

The City of Fond du Lac has made strides conducting outreach to groups who may be more likely to experience housing discrimination. For example, as part of its contract with the City of Fond du Lac, the Metropolitan Milwaukee Fair Housing Council conducts fair housing outreach and education services, including fair housing and fair lending presentations and distribution of informational materials in English, Spanish and Hmong.

Continue to support affordable housing and multifamily housing construction through ongoing review and revision, if necessary, of the City's zoning map and other codes.

Zoning review is an ongoing effort. The City of Fond du Lac recently approved a variance for affordable apartments in a redeveloping industrial corridor. In addition, the City also approved two special use permits for converting former schools into affordable housing.

Continue to AFFH through activities identified in the Comprehensive Plan related to housing such as encourage developers of newly platted subdivisions to provide for entry level housing by allowing a reduction in the minimum lot area for no more than 20% of the lots in the subdivision.

The City's efforts to promote flexibility in zoning and land use for the furthering of fair housing are ongoing. However, due to the decline in the housing market over the last decade, there have not been any new requests for subdivisions.

Continue to support efforts to create a comprehensive housing counseling agency to assist tenants, housing providers and potential homebuyers with their housing issues.

At present, the City utilizes Advocap Consumer Credit Counseling⁵ to accomplish this goal.

Continue to support programs offered by the City and County Housing Authorities.

The City of Fond du Lac continues to support the Housing Authority of the City of Fond du Lac and its activities.

Continue the City's housing rehabilitation program.

⁵ Consumer Credit Counseling Service (CCCS), is a non-profit full-service credit counseling agency, providing confidential financial assessments, financial education, budget, housing, bankruptcy, and credit/debt counseling to consumers throughout Wisconsin.

The City's Housing Rehab Loan Program continues to contribute to fair housing by preserving some diverse housing stock that can meet the needs of various populations. The housing rehab loan program can be utilized by any existing or new homeowner throughout the City, subject to income eligibility. Housing options are made available at various level of affordability and various sizes within the City, with the goal of assisting individuals to live and work within the community.

Continue to support "United for Diversity," a local organization which promotes unity and understanding, embracing and celebrating differences among all people in the Fond du Lac area. The City supports the efforts of "United for Diversity." The City intends to expand this conversation by participating and supporting other events such as the Walk One Hour in My Shoes Program, Humanity Project, etc.

Staff will continue to monitor new zoning codes/ordinances and public policies adopted by the City to determine if there will be any impact on fair housing practices or affordable housing. City staff review of zoning policy is ongoing. Staff review the City's zoning code annually, in addition to tracking other communities' best practices.

Fair Housing Analysis

Demographic Summary

Demographic patterns in the jurisdiction and region and trends over time (since 1990)

The population of the City of Fond du Lac has increased very slightly since 2000. In 2000, the City's population was 42,203; by 2015 the population had increased by just 857 people, or 2%, to 43,060. Fond du Lac County's population has grown at a slightly greater rate, from 97,296 in 2000 to 101,920 in 2015. This is an increase of 4,624 people, or 4.5%, over that 15-year time period.⁶

As shown in HUD's Table 2, there has been a significant shift in the racial and ethnic proportions since 1990. The white, non-Hispanic population has decreased; in 1990, white non-Hispanics comprised 97% of the City's total population, or 37,606 people, and by 2010 that had dropped to 87.2%, or 31,582 people. Fond du Lac's school-age youth has greater diversity than its general population; almost 1 in 4 school-age children are racial or ethnic minorities. In the 2013-2014 school year, only 77.7% of the Fond du Lac School District's (FDLSD) student population was white, non-Hispanic.⁷

Among people of color in Fond du Lac, the largest minority group is the Hispanic population, which comprises 7% of the total population, or 2530 persons. In 1990, the Hispanic population was only 1.4% of the total population (or 560 persons). In FDLSD, 10.7% of students are Hispanic. Fond du Lac's black population has also grown since 1990, from 111 black residents (or 0.3%) in 1990 to 719 (2%) in 2010. 7.2% of students in FDLSD are black. The Asian population is growing as well, from 0.75% in 1990 to 1.68% in 2010. Asian Americans make up 3.6% of FDLSD's students.

The City of Fond du Lac's foreign-born population has increased from 1.4% in 1990 to 4.9% in 2010. The primary countries of origin for this population are Mexico, India, Honduras and Germany. The percentage of persons with limited English proficiency has more than tripled, from 1.3% in 1990 to 4.9% in 2010. Spanish, Hmong and Greek are the 3 most common languages other than English.

From 1990 to 2010, the population under age 18 has declined (26.2% to 23.1%); the population ages 18-64 has increased (57.9% to 62.3%); and the population aged 65 and over has decreased (15.9% to 14.6%).

⁶ Population data from the US Census and the American Community Survey

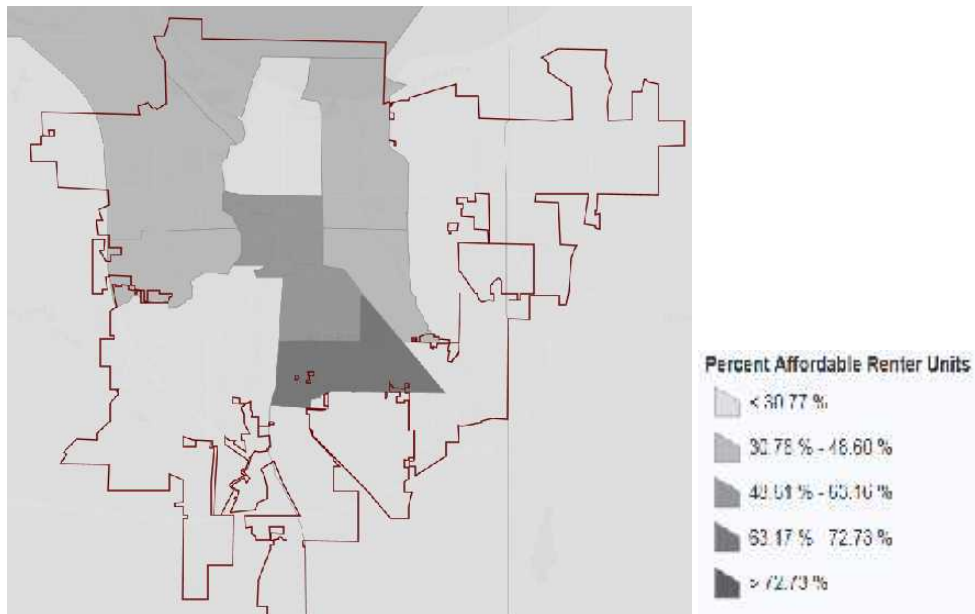
⁷ Wisconsin Department of Public Instruction School District Report Cards

Location of homeowners and renters in the jurisdiction and region and trends over time

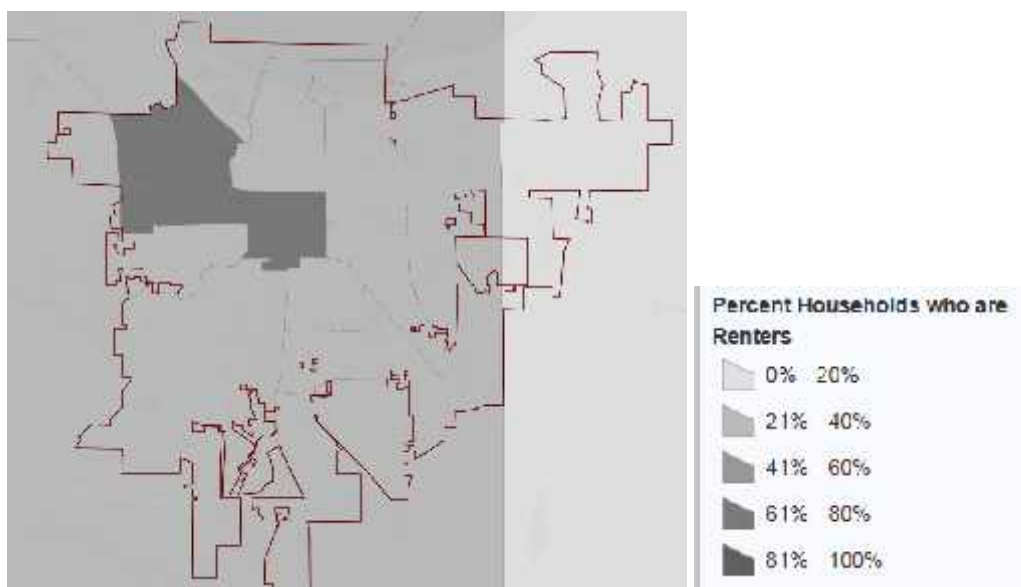
Location of rental housing:

Over 41% of the City of Fond du Lac's residents rent their housing. Maps 1 and 2 show that renters and affordable rental housing are more concentrated in the City's center and northwest quadrant.

MAP 1: Percent Affordable Renter Units



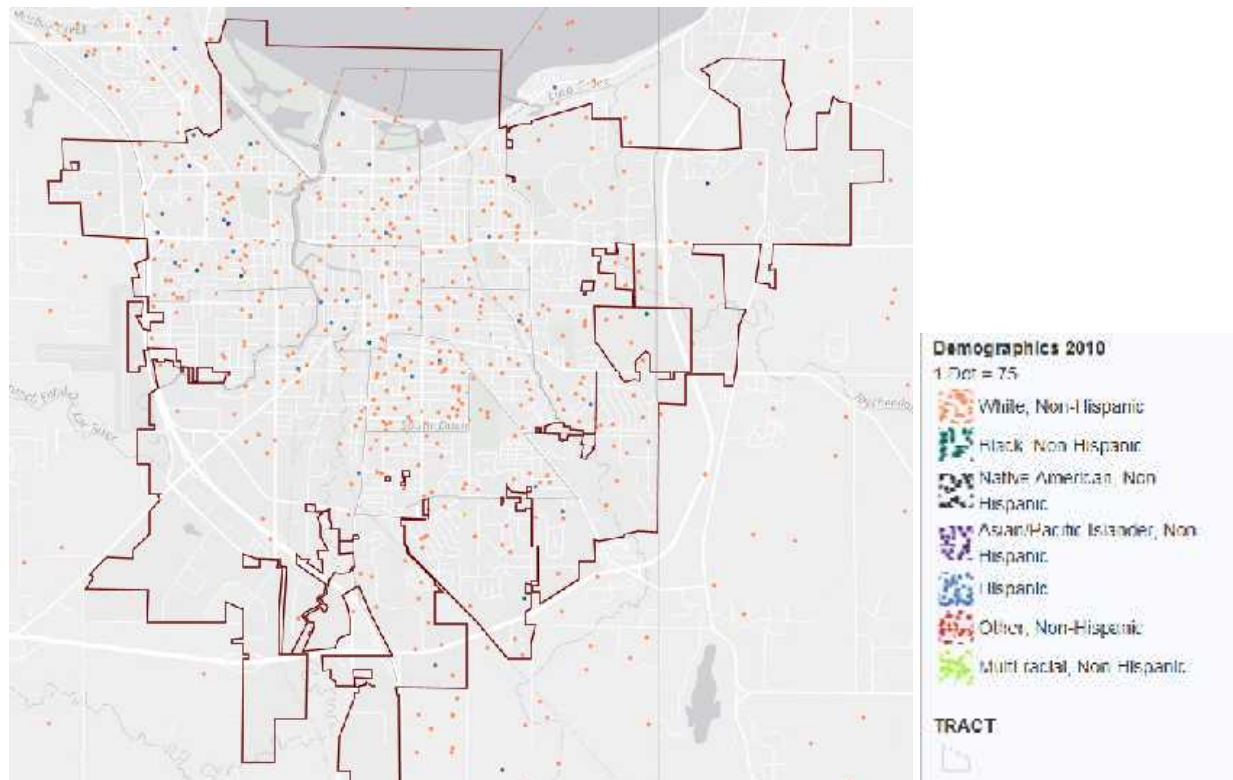
MAP 2: Percent of Households who are Renters



According to Map 3 below and [HUD Maps 1- 4](#) (in Appendix B), the northwest part of Fond du Lac, bordering North Fond du Lac, also has the greatest numbers of persons of color and foreign-

born persons. Specifically, proportions of rental units in census tracts 403 (75.0%) and 405 (68.1%), are considerably higher than the city's average of 41.6%.

MAP 3: Fond du Lac Race and Ethnicity



The Low Income Housing Tax Credit (LIHTC) program is a commonly-used means of creating affordable rental housing in the United States. The City of Fond du Lac has 1134 LIHTC units, including 276 elderly units and 858 family units; in contrast, Fond du Lac County has 267 LIHTC units, of which 122 are elderly units and 145 are family units. Most of the LIHTC developments in the City are in lower-income parts of the city in which the housing stock is older. One LIHTC developer said this is primarily due to the Wisconsin Housing and Economic Development's, (WHEDA) policies.

While the LIHTC program has produced a relatively large number of rental housing units nationally, concerns have been raised that the geographic distribution of LIHTC housing has exacerbated poverty concentration and racial concentration. When looking at central cities around the country, research has found that the pattern becomes even more pronounced: 35%

of LIHTC units were found to be located in census tracts with over 30% poverty, while only 21% of all rental units were found in similar locations.⁸

The LIHTC program is not uniformly administered across the U.S. WHEDA and other state housing finance agencies have considerable discretion over tax credit allocation. Tax credits are very competitive and the QAP criteria play a major role in where tax credit developments are built. The U.S. Department of Housing and Urban Development's report "Effect of QAP Incentives on the Location of LIHTC Properties" highlighted five major Qualified Allocation Plan (QAP) priorities: 1) high-opportunity neighborhoods, 2) proximity to amenities, 3) community approval, 4) furthering investment in blighted neighborhoods, and 5) avoiding concentrations of affordable housing.

Based on its QAP, WHEDA's priority appears to be "furthering investment in blighted neighborhoods." On its face, investment in blighted neighborhoods is important. However, unintended consequences of this investment can result in the concentration of LIHTC developments in lower-income parts of Fond du Lac, which can lead to racial and economic segregation as it has in metropolitan Milwaukee.

Homeownership:

Homeownership is central to Americans' ability to accrue wealth. Homeowners' wealth over time has significantly outpaced that of renters. Homeownership rates in Fond du Lac County (71.4%) are greater than those in the City of Fond du Lac (58.4%). This is due primarily to the City's proportionately larger rental housing supply. HUD Maps 5 and 6 (in the Appendix) show where the City's and County's publicly supported housing is located.

Although there was a sharp decline in the City's overall homeownership rates due to the increase in foreclosures during the housing crisis, homeownership rates by race and ethnicity vary significantly in the City of Fond du Lac. Whites (with a homeownership rate of 61.5%) are significantly more likely to own homes than blacks (6.3%), Hispanics (28%), Asians (12.3%) and Native Americans (17%).

Low homeownership rates are inversely proportionate to the poverty rates (see Table 2). The poverty rate of blacks (36.6%) is more than four times that of whites (8.3%); Native American (23.5%) and Hispanic (24.0%) poverty rates are more than double that of whites; and Asian Americans (12.5%) have a slightly higher poverty rate than whites.

⁸ Ibid

TABLE 1: Fond du Lac Tenure by Race and Ethnicity (City and County)

	Total City Households	Owner		Renter		Total County Households	Owner	Renter
White	17036	61.5%	10479	38.5%	6557	39485	73.4%	26.6%
Black	285	6.3%	18	93.7%	267	385	6.5%	93.5%
NA	47	17.0%	8	83.0%	39	111	56.8%	43.2%
Asian	203	12.3%	25	87.7%	178	284	28.5%	71.5%
Hispanic	888	28.0%	249	72.0%	639	1315	41.1%	58.9%

Source: 2015 ACS-5 year estimates

TABLE 2: Fond du Lac Poverty by Race and Ethnicity

	Poverty Rate
White	8.3%
Black	36.6%
NA	23.5%
Asian	12.5%
Hispanic	24.0%

Source: 2015 ACS-5 year estimates

General Issues

Segregation/Integration

Segregation levels in the jurisdiction and region, racial/ethnic groups that experience the highest levels of segregation, areas with relatively high segregation and integration by race/ethnicity, national origin, or LEP group

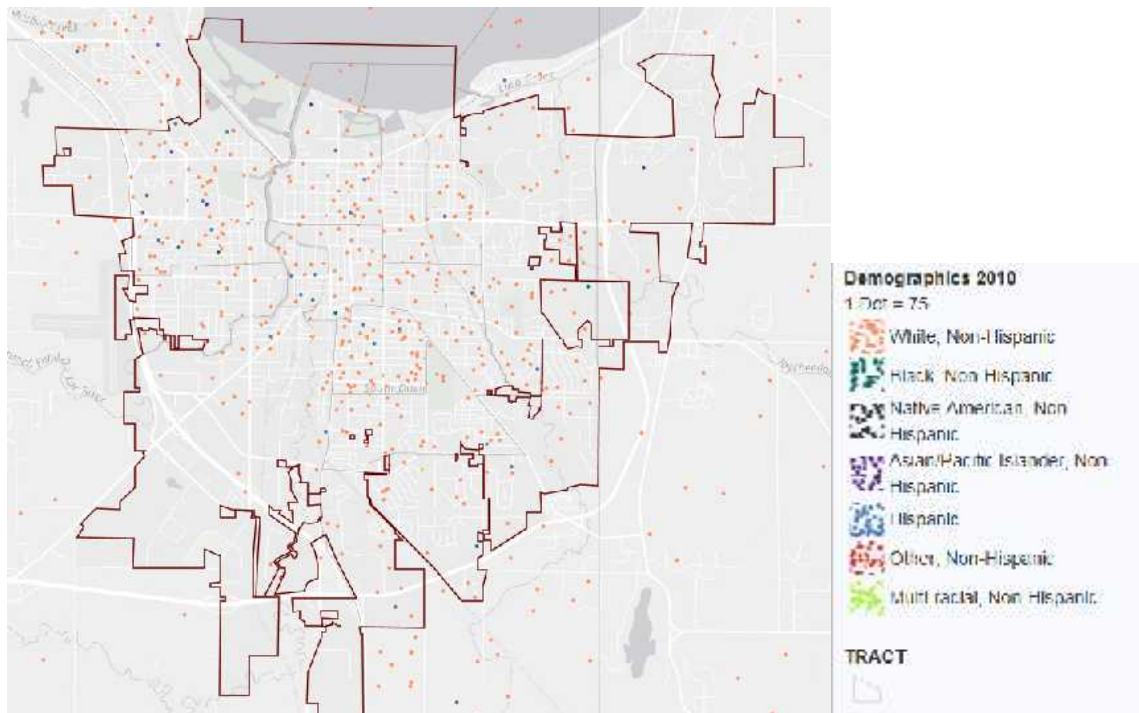
The City of Fond du Lac's minority populations generally experience low levels of segregation, as measured by *dissimilarity indices of segregation*.⁹ However, when a group's population is less than 1,000 people, dissimilarity indexes are less reliable than when assessing larger populations, and in Fond du Lac, black, Asian and Native American populations each have fewer than 1,000 individuals. The non-white/white dissimilarity index for Fond du Lac was 26.18 in 2010, increasing from 19.15 in 1990. The Hispanic population was 2,530 in 2010. The *dissimilarity* trend for this population has increased from 24.5 in 1990 to 28.1 in 2010, still in the low segregation range. (Indices from 0-39 are considered a low level of segregation.)

Location of owner and renter occupied housing

According to Map 3, the northwest part of Fond du Lac, bordering North Fond du Lac, has the greatest concentrations of people of color and foreign-born residents. This part of the City also has a considerably higher proportion of rental housing units. Percentages of rental units in census tracts 403 (75.0%) and 405 (68.1%) are significantly higher than the city's average of 41.6%.

⁹ The dissimilarity index measures the relative separation or integration of groups across all neighborhoods of a city or metropolitan area. If a city's white-black dissimilarity index were 65, that would mean that 65% of white people would need to move to another neighborhood to make whites and blacks evenly distributed across all neighborhoods.

MAP 3: Fond du Lac Race and Ethnicity



Demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future

Assuming the increase in black, Hispanic and Asian American populations continues, as demographic trends suggest, and assuming disparities in income by race and ethnicity continue, the placement of all affordable housing in one part of the City is highly likely to increase racial segregation.

Additional relevant information about segregation in the jurisdiction and region affecting groups with other protected characteristics.

According to a study done by the Martin Prosperity Institute in 2015, the Fond du Lac area had the lowest level of income segregation and overall economic segregation of all other Metropolitan Statistical areas in the country.¹⁰

The “Equality of Opportunity Project” from Harvard University found that Fond du Lac County children living in poverty are likely to earn \$3,330 annually more than their parents by age 26.

¹⁰ SEGREGATED CITY The Geography of Economic Segregation in America’s Metros, Martin Prosperity Institute, 2015

The City of Fond du Lac should work to maintain these positive attributes and improve upon them, as its population diversifies and grows.

Contributing Factors of Segregation

[Factors affecting segregation in the jurisdiction and region and factors that significantly create, contribute to, perpetuate, or increase the severity of segregation](#)

Community opposition: Community opposition to affordable housing in Fond du Lac County, outside the City of Fond du Lac has limited affordable housing opportunities for people in the County. All communities, particularly communities with employment opportunities, need to consider housing for a range of incomes.

Location and type of affordable housing: Maps 1 and 2 in an earlier section show that renters and affordable rental housing are more concentrated in the City's center and northwest quadrant. According to Map 3 the northwest part of Fond du Lac, has greatest concentrations of people of color and foreign-born residents. Increasing the amount of affordable rental housing of all unit sizes in parts of the City and County that are currently underrepresented should be considered

Private-market discrimination: It is difficult to assess the severity of private market discrimination in Fond du Lac based on the number of complaints reported to the Metropolitan Milwaukee Fair Housing Council, U.S. Department of Housing and Urban Development and the Wisconsin Equal Rights Division. According to the National Fair Housing Association's 2015 Trends Report, "housing discrimination is significantly underreported, mostly because it can be difficult to discern. According to the U.S. Department of Housing and Urban Development, the number of reported complaints represents less than one percent of the four million instances of housing discrimination that are estimated to occur each year." Multiple stakeholders in Fond du Lac believe discrimination is occurring by some of the city's smaller housing providers.

Disparities in Access to Opportunity

Educational Opportunities

Disparities in access to proficient schools based on race/ethnicity, national origin, and family status

Fond du Lac public schools are performing better than the State of Wisconsin average. The Fond du Lac School District received an “Exceeds Expectations” in the State of Wisconsin Department of Public Instruction Report Card.

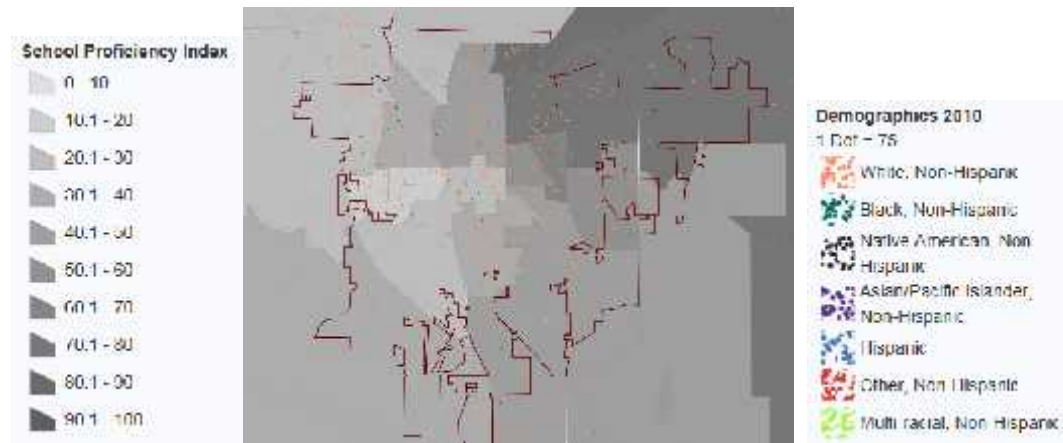
According to HUD Table 12 (in Appendix), variations between racial and ethnic groups in terms of educational opportunities is minimal, although whites fare slightly better. White students’ school proficiency index¹¹ is 39.80, while black students’ school proficiency index is 35.57. Native American, Hispanic and Asian groups’ access to proficient schools falls between 35.57 and 39.8.

Relationship between the residency patterns of racial/ethnic, national origin, and family status groups and their proximity to proficient schools

Map 4 below indicates a potentially problematic relationship between proficient schools and where people of color reside. The schools on the east side of Fond du Lac have the highest school proficiency. West side schools have lower school proficiency levels and the highest proportion of nonwhite students. Foreign-born persons of any race experience a similar pattern as nonwhites in Fond du Lac.

¹¹ The School Proficiency Index measures the proficiency of elementary schools in the attendance area of individuals sharing a protected characteristic. The values for the Index are determined by the performance of 4th grade students on state exams. Map 9 consists of three sub-maps showing the spatial distribution of racial/ethnic and national origin groups and families with children overlaid by shading that shows school proficiency levels of the jurisdiction and the region.

MAP 4: Fond du Lac School Proficiency with Race and Ethnicity



Protected class groups and accessing proficient schools

There has been a marked increase in the proportion of nonwhite children attending public schools in Fond du Lac from 1999 to 2011. The student body was 94.5% white in 1990; by 2010 the percentage of whites had decreased to 86.1%.¹²

TABLE 3: Poverty Rate in Fond du Lac Public Primary Schools

EDUCATION: Poverty Rate in Public Primary Schools				
	1999 2000	2000 2001	2007 2008	2010 2011
Metro Area	15.4%	16.7%	32.1%	39.7%

Source: Diversity Data Kids

Table 3, above, from Diversity Data Kids, illustrates a significant increase in Fond du Lac School District's student poverty rate. The poverty rate increased from 15.4% to 39.7% between 1999 and 2011. Wisconsin's Department of Public Instruction report shows that by 2016, 44.1% of the district's students are economically disadvantaged.¹³

Disparities in student achievement by race and ethnicity are a significant concern. (See Figure 1.) Data from the Wisconsin Department of Public Instruction indicates that 44% of all students tested in English Language Arts in the Fond du Lac School District scored advanced or proficient; 56% scored as basic or below basic. Only 11% of African American children scored advanced or proficient; 32% of Hispanic children scored advanced or proficient. Asian children scored slightly higher than the district with 47% scoring advanced or proficient. 16% of students with disabilities

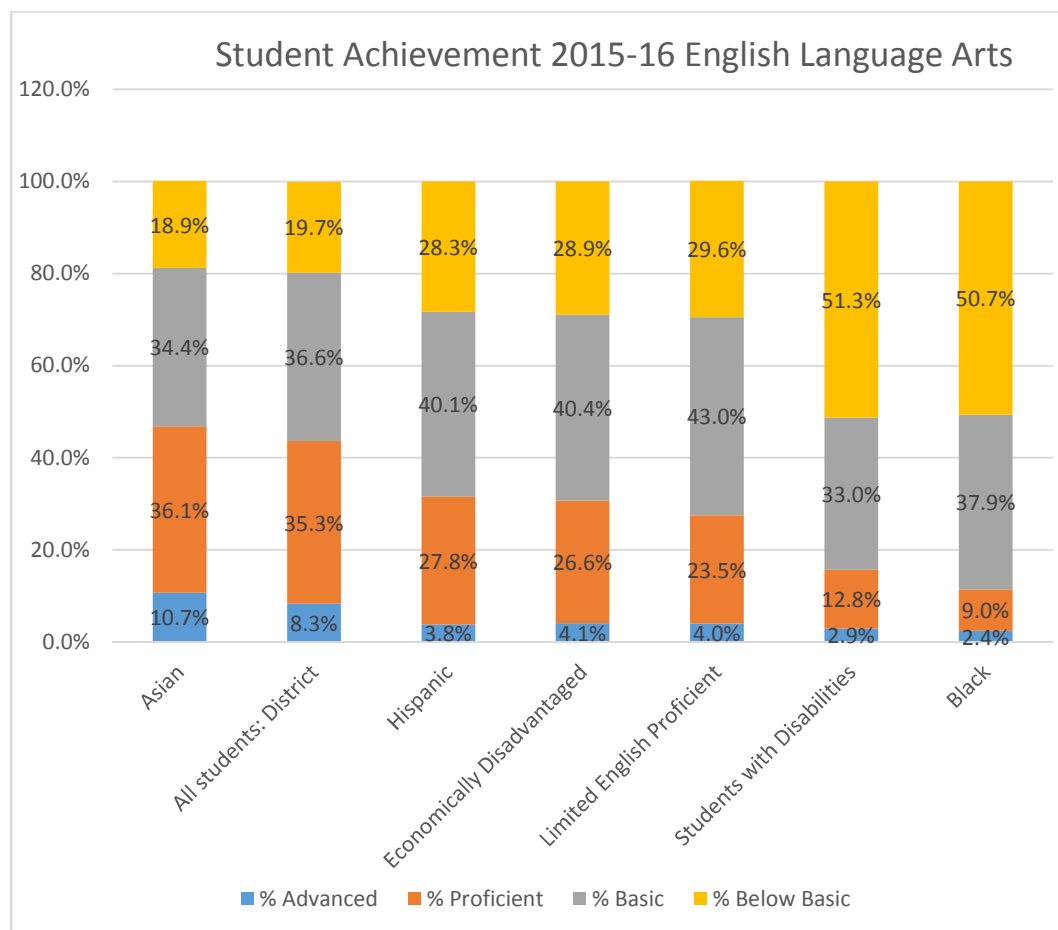
¹² www.Diversitydatakids.org

¹³ An "economically disadvantaged" student is a student who is a member of a household that meets the income eligibility guidelines for free or reduced-price meals (less than or equal to 185% of Federal Poverty Guidelines) under the National School Lunch Program (NSLP).

scored as advanced or proficient; 31% of economically disadvantaged kids scored advanced or proficient. 28% of children with limited English proficiency scored advanced or proficient.

Adults without a high school diploma or an equivalent credential are more likely to be unemployed, underemployed or live in poverty. The 2015 American Community Survey shows disparities in educational attainment, specifically those without a high school diploma, by race and ethnicity. (See Table 4.) Fond du Lac blacks, Native Americans, Asian Americans, and Hispanics are all more likely to lack a high school diploma than are whites. Asian Americans and Hispanics have the largest disparities: Asian Americans are almost two times more likely than whites and Hispanics are almost three times more likely than whites to lack a high school diploma. These two groups are more likely to be foreign born, which may account for the larger discrepancy.

Figure 1: Fond du Lac Student Achievement 2015-16 English Language Arts



**TABLE 4: Fond du Lac Educational Attainment
- No diploma**

	County	City
White	8.4%	9.5%
Black	10.7%	14.2%
Native American	11.9%	14.9%
Asian American	16.1%	18.7%
Hispanic	25.1%	27.2%

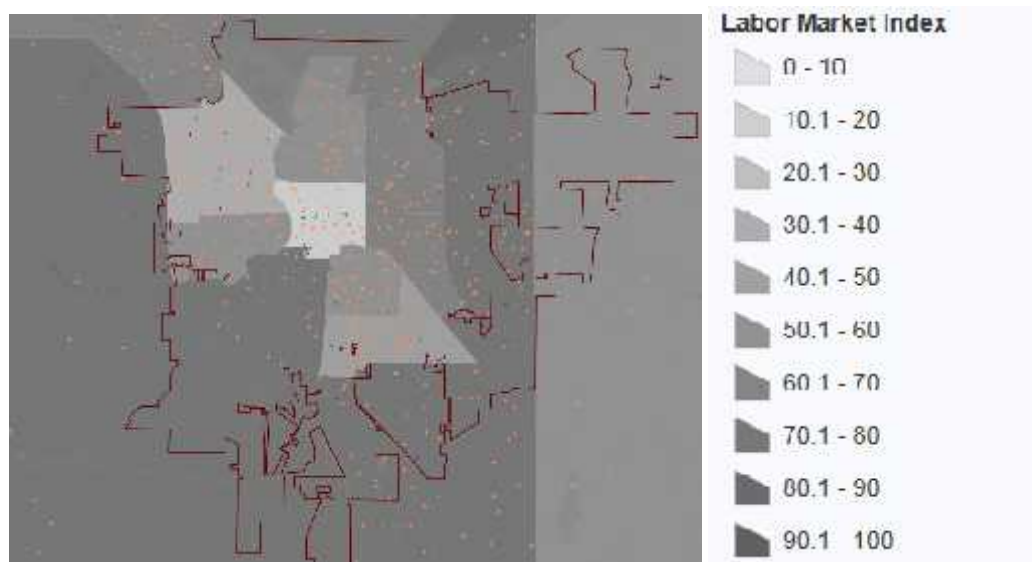
Employment Opportunities

Disparities in access to jobs and labor markets by protected class groups: How does a person's place of residence affect their ability to obtain a job? Which racial/ethnic, national origin, or family status groups are least successful in accessing employment?

For most households, access to employment opportunities is an essential building block to improving quality of life. HUD Table 12 measures jobs proximity¹⁴ and labor market engagement¹⁵ by race and ethnicity. Data from this table indicates that while persons of color in Fond du Lac are somewhat closer to jobs than whites, their participation in the labor market lags behind that of the white population.

Black residents' job proximity index is 69.40, the highest of all racial and ethnic groups, but their labor market engagement is 47.28, the lowest of all racial and ethnic groups. The white population, in general, is the farthest from jobs (54.10), yet has the highest labor market engagement (57.53). Asian (56.63) and Native American (54.28) populations' labor engagement is similar to that of whites. Hispanics (48.26) labor market engagement index is slightly higher than that of black residents.

MAP 5: Fond du Lac Labor Engagement with Race and Ethnicity



¹⁴ The Jobs Proximity Index measures the physical distances between place of residence and jobs by race/ethnicity. The Labor Market Engagement Index provides a measure of unemployment rate, labor-force participation rate, and percent of the population ages 25 and above with at least a bachelor's degree by neighborhood. Map 10 shows residency patterns of racial/ethnic and national origin groups and families with children overlaid by shading that shows the job proximity measure for the jurisdiction. Map 11 shows residency patterns of racial/ethnic and national origin groups and families with children overlaid by shading that shows labor engagement for the jurisdiction.

¹⁵ The labor market engagement index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a census tract.

According to the Bureau of Labor Statistics, Fond du Lac's unemployment rate in December of 2016 was quite low at 3.0%. Employment rates from the 2015 American Community Survey show some racial and ethnic disparities (see table below); in particular, poverty rate disparities are of serious concern. Whites' poverty rate is 8.3%. Blacks' poverty is nearly 4.5 times that of whites; Native Americans' and Hispanics' poverty is almost 3 times higher than that of whites, and Asian Americans' poverty is 1.5 times that of whites.

TABLE 5: Fond du Lac Poverty and Employment Rates by Race and Ethnicity

	Poverty Rate	Employment Rate
White	8.3%	92.4%
Black	36.6%	84.7%
NA	23.5%	80.2%
Asian	12.5%	97.2%
Hispanic	24.0%	89.9%

Source: American Community Survey – 2015 5-year estimates

Transportation Opportunities

Disparities in access to transportation based on place of residence, cost, or other transportation related factors

The ability to conveniently get to and from employment, school, home and other community amenities is a key component of affirmatively furthering fair housing. According to HUD Table 12 in the Appendix, racial and ethnic disparities in Fond du Lac's transportation opportunity are minimal.¹⁶ Hispanics have the highest transportation cost index at 66.67. Whites have the lowest at 60.82. Blacks' transportation cost index is 65.37; for Asians, it is 61.76, and for Native Americans it is 61.92.

According to the 2015 American Community Survey 5-year estimates, the means of transportation to work varies significantly by race and ethnicity. (See Figure 2.) For instance, 93% of whites use their car or carpool to get to work; fewer than 3% walk or use transit. 57.5% of blacks use their car or carpool to get to work, but 42.5% walk or use transit. Native Americans, Asian Americans, and Hispanics are more likely to use a car or carpool than walk or use transit. (See Table 6.)

TABLE 6: Fond du Lac Method of Transportation by Race and Ethnicity

	car alone	carpool	transit	walk	taxi	work at home
White	82.3%	10.6%	0.2%	2.7%	1.9%	2.3%
Black	49.0%	8.5%	17.0%	25.5%	0.0%	0.0%
Native American	26.1%	53.6%	0.0%	20.3%	0.0%	0.0%
Asian	57.4%	33.5%	0.8%	2.3%	6.1%	0.0%
Hispanic	68.7%	22.0%	0.0%	4.2%	4.7%	0.4%

Source: American Community Survey – 2015 5-year estimates

Which racial/ethnic, national origin or family status groups are most affected by the lack of a reliable, affordable transportation connection between their place of residence and opportunities?

The transit index provided in Table 12 indicates very little transportation disparity based on race and ethnicity. However, 2015 ACS data indicates that African Americans are significantly more likely to utilize the Fond du Lac Area Transit system. As a result, the extent to which the transit

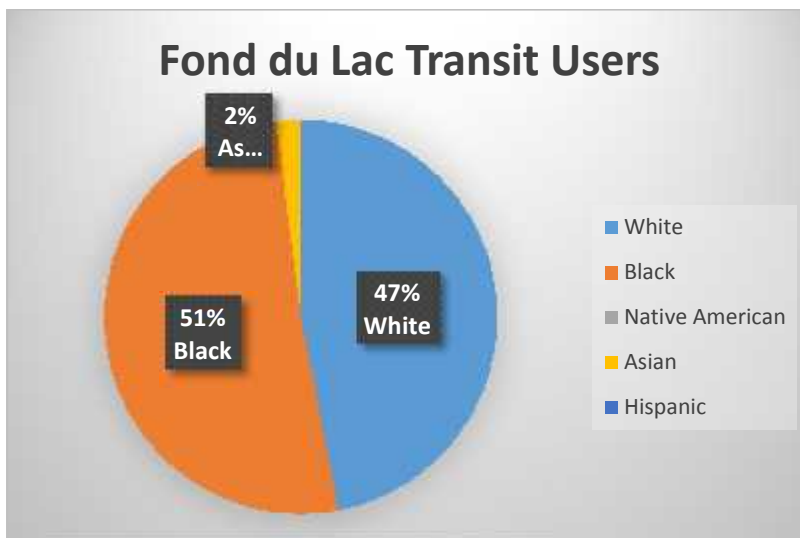
¹⁶ The Low Transportation Cost Index measures cost of transport and proximity to public transportation by neighborhood. The Transit Trips Index measures how often low-income families in a neighborhood use public transportation. Map 12 shows residency patterns of racial/ethnic and national origin groups and families with children overlaid by shading that shows transportation access at the neighborhood level. Map 13 shows residency patterns of racial/ethnic and national origin groups and families with children overlaid by shading that shows low transportation costs at the census tract level.

system is able to meet the needs of its riders is of greater consequence to African Americans than other racial and ethnic groups, and deficits in the system have a disproportionate impact on black residents.

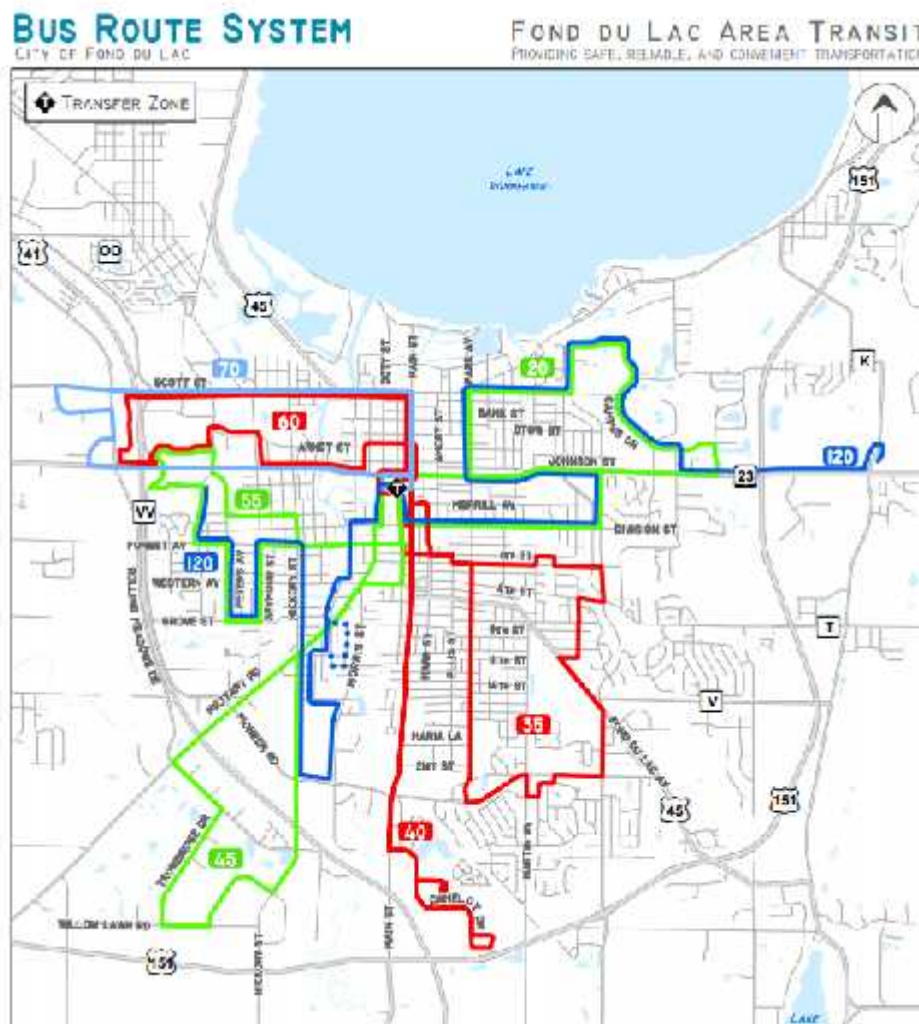
MAP 6: Fond du Lac Transit Trips with Race and Ethnicity



FIGURE 2: Fond du Lac Transit Users



MAP 7: Fond du Lac Area Transit Bus Routes



Describe how the jurisdiction's and region's policies, such as public transportation routes or transportation systems designed for use personal vehicles, affect the ability of protected class groups to access transportation.

In 2016 Fond du Lac Area Transit developed a Transit Development Plan (TDP).¹⁷ The goal of the Fond du Lac TDP is to define the community's transit needs through extensive outreach; define alternative courses of action, and develop a systematic plan to move Fond du Lac Area Transit (FDLAT) into the future.

¹⁷ <http://www.ecwrpc.org/wp-content/uploads/2017/01/2016-Fond-du-Lac-TDP.pdf>

Funding for Fond du Lac Area Transit, like other transit systems nationwide, is limited. Limited funding is part of the reason for limited hours and routes. According to the data on ridership, these limited hours and routes are more likely to affect black residents than other racial groups.

The City is responsive to various transit needs through the following:

-) The Fond du Lac Area Transit system has services to accommodate persons using wheelchairs. HANDIVAN is a wheelchair lift-equipped van providing a transportation alternative for those citizens who are unable to use regular transit service.
-) ADVOCAP operates a program to assist persons with a vehicle purchase. The Work-N-Wheels Program assists income qualified employed individuals obtain a 0% interest loan to purchase reliable, affordable transportation for work related needs.
-) The City is considering a bike share¹⁸ program to complement the City's other transportation options.

¹⁸ Bike sharing is a transportation program, ideal for short distance point-to-point trips, providing users the ability to pick up a bicycle at any self-serve bike-station and return it to any other bike station located within the system's service area.

Low Poverty Exposure Opportunities

Disparities in exposure to poverty¹⁹ by protected class groups.

Exposure to poverty has a variety of negative impacts, particularly on children's health and education. According to HUD's Table 12 (in Appendix), black (41.35) and Hispanic (40.52) groups have a greater exposure to neighborhood level poverty than whites (54.48) in Fond du Lac. Asian (50.68) and Native American (49.89) groups have lesser exposure than blacks and Hispanics.

What role does a person's place of residence play in their exposure to poverty?

As discussed in the section on segregation, persons of color are more populous in the western census tracts of Fond du Lac. These census tracts also have higher poverty levels.

Which racial/ethnic, national origin or family status groups are most affected by these poverty indicators?

As stated above, blacks, Hispanics, and Native and Asian Americans all have greater exposure to neighborhood-level poverty than whites.

According to the 2015 American Community Survey, the poverty rate for persons with disabilities (31.8%) in the city of Fond du Lac is 3 times that of persons without disabilities (10.5%).

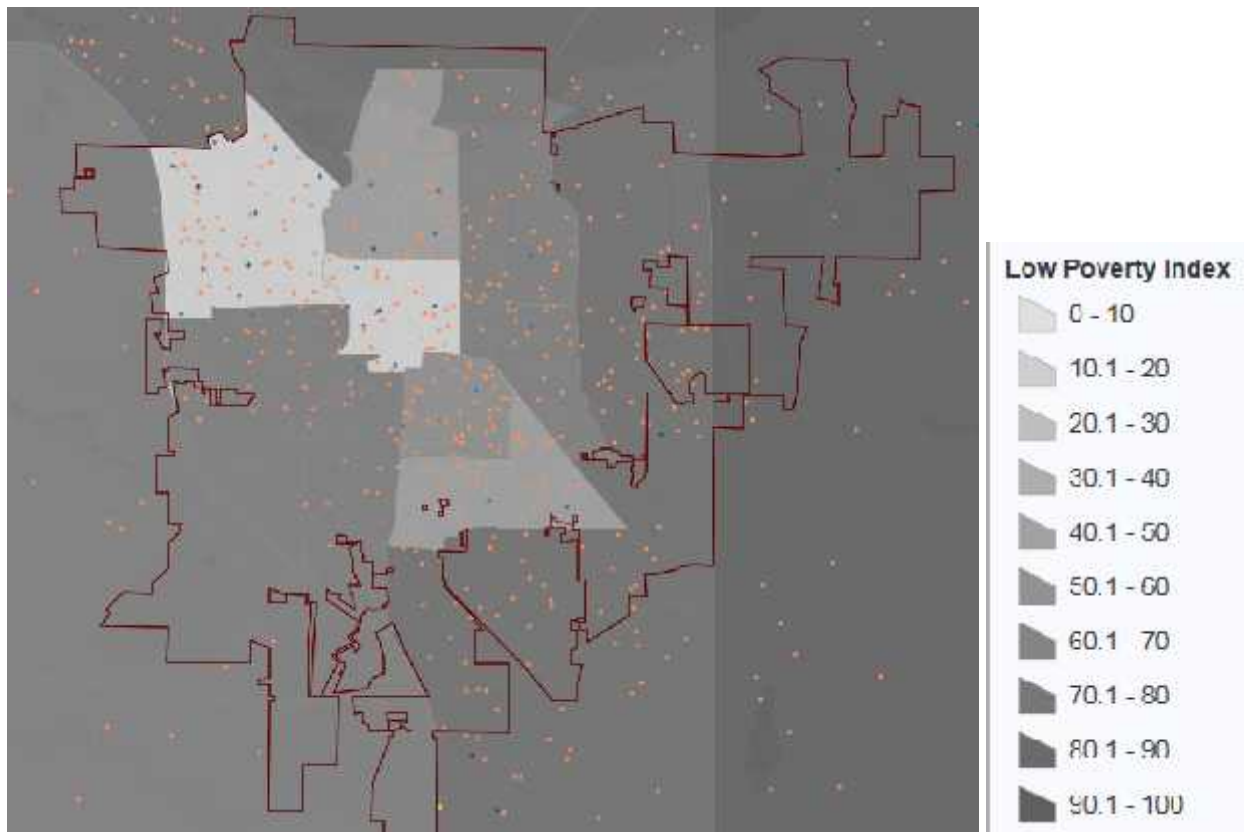
TABLE 7: Fond du Lac Poverty and Employment Rates by Race and Ethnicity

	Poverty Rate	Employment Rate
White	8.3%	92.4%
Black	36.6%	84.7%
NA	23.5%	80.2%
Asian	12.5%	97.2%
Hispanic	24.0%	89.9%

Source: American Community Survey – 2015 5-year estimates

¹⁹ The Low Poverty Index uses rates of family poverty by household (based on the federal poverty line) to measure exposure to poverty by neighborhood. A higher score generally indicates less exposure to poverty at the neighborhood level. HUD's Map 14 (Appendix) shows residency patterns of racial/ethnic and national origin groups and families with children overlaid by shading that depicts poverty levels for the jurisdiction.

MAP 8: Fond du Lac Low Poverty Index with Race and Ethnicity



Environmentally Healthy Neighborhood Opportunities

Disparities in access to environmentally healthy neighborhoods by protected class groups

In Fond du Lac, the Environmental Health Index²⁰ differentiation in rates of exposure to environmental hazards based on race and ethnicity is relatively small. Whites have the highest environmental health index (49.72), and Hispanics have the lowest at 43.56. Asians (48.39), Native Americans (46.13) and blacks (45.88) have similar rates.

While this Index's differentiation is minor, it is important to consider the ways in which air quality, locations of highways, waste sites and industrial plants can impact the quality of a community or neighborhood.

²⁰The Environmental Health Index measures exposure to harmful environmental conditions based on EPA estimates of air quality carcinogenic, respiratory, and neurological toxins by neighborhood. A high index score indicates a healthier neighborhood. Map 15 shows residency patterns of racial/ethnic and national origin groups and families with children overlaid by shading showing the level of exposure to environmental health hazards for the jurisdiction.

Patterns in Disparities in Access to Opportunity

Identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors based on race/ethnicity, national origin or familial status.

Access to educational, employment and transportation opportunities, as well as access to low-poverty and environmentally healthy neighborhoods, are essential in the provision of equal housing opportunities. A factor of particular concern in a fair housing analysis is where persons of various races and ethnicities reside. Less proficient schools, higher poverty and lower labor engagement all are more common for residents in the western census tracts, where significant numbers of people of color reside. A variety of factors contribute to these disparities.

Contributing Factors of Disparities in Access to Opportunity

Consider factors affecting disparities and access to opportunity in the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity.

Lending discrimination: It is difficult to assess the severity of private market discrimination in Fond du Lac based on complaints reported to the Metropolitan Milwaukee Fair Housing Council, U.S. Department of Housing and Urban Development and the Wisconsin Equal Rights Division. However, stakeholders have suggested that discrimination is likely occurring. Lending discrimination subtle, sophisticated, embedded in credit and institutional policies. A lending analysis is included in the Appendix of this report.

The availability and frequency of public transportation: Many stakeholders have identified that limited routes and hours of service for the Fond du Lac Area Transit limit residents' access to employment opportunity. For example, the bus system is not an option for an employee working third shift.

Limited child care hours: Like the transit system, child care services are not readily available for people who work third shift or weekends. This may reduce a person's access to employment opportunities.

Lack of cooperation by neighboring communities: Fond du Lac County communities outside the City do not have adequate affordable housing, particularly near employment opportunities.

Location of employers: Too often, employers do not consider where their labor force resides or whether that labor force has access to transit to get to work.

Location and type of affordable housing: Maps 1 and 2 in an earlier section show that renters and affordable rental housing are more concentrated in the City's center and northwest quadrant, further from high educational opportunity than residents on the east side of Fond du Lac.

According to Map 3 the northwest part of Fond du Lac, has greatest concentrations of people of color and foreign-born residents.

Private-market discrimination: As mentioned in previous sections, it is difficult to assess the severity of private market discrimination in Fond du Lac based on the number of complaints reported to the Metropolitan Milwaukee Fair Housing Council, U.S. Department of Housing and Urban Development and the Wisconsin Equal Rights Division. Multiple stakeholders in Fond du Lac believe discrimination is occurring by some of the city's smaller landlords.

Disproportionate Housing Needs

Which groups (by race/ethnicity and family status) experience higher rates of housing cost burden, overcrowding, or substandard housing²¹ when compared to other groups? Which groups also experience higher rates of severe housing burdens when compared to other groups?

31% of Fond du Lac households experience housing problems.²² When analyzed by race and ethnicity, disparities emerge: 30.1% of white households, 43.8% black households, 47.5% Hispanic households, 37.8% Asian American households, and 66.7% of Native American households experience housing problems.

Severe housing cost burden, when more than 50% of household income is used for housing, is a significant problem for black households in Fond du Lac. 43.8% of black households have a severe cost burden, whereas only 12.1% of whites, 11.6% of Hispanics, 8.1% of Asian American and 0% of Native American households have a severe housing cost burden. Cost burden in any amount decreases a household's housing stability. In turn, housing instability can lead to homelessness, as well as health, education, and employment challenges.

Several community stakeholders stated housing instability is a problem in Fond du Lac. There are approximately 520 evictions annually in Fond du Lac County (about 10 per week). Once a tenant has an eviction on their record it becomes even more difficult to secure housing. Whether due to evictions or other household disruptions, there is, "...considerable transiency in Fond du Lac. Instability in housing is causing families to make a lot of moves," explained a representative from the Fond du Lac School District. Frequent moves can lead to students' poor social and academic development, as well as lower attendance and graduation rates.

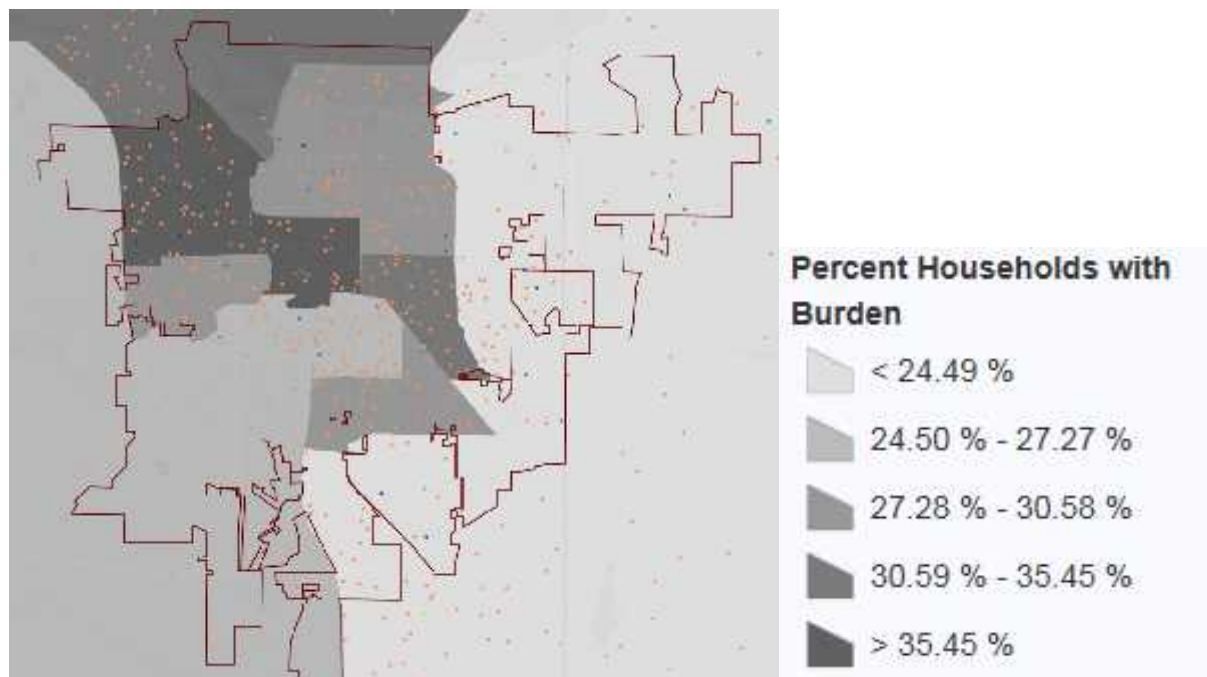
Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, and what are the predominant race/ethnicity or national origin groups in such areas?

The northwestern census tracts of Fond du Lac have the highest proportion of households with a housing cost burden. (See Map 9.) This pattern aligns with the housing problem disparities based on race, ethnicity and foreign-born status as well as the location of those groups on the city's northwest side.

²¹ Substandard housing is defined as a dwelling with incomplete kitchen facilities and/or incomplete plumbing facilities.

²² The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30% (i.e., more than 30% of a household's income is used to pay housing costs.)

MAP 9: Fond du Lac Households with Housing Cost Burden



Needs of families with children for housing units with two and three or more bedrooms with the available existing housing stock in each category of publicly supported housing.

According to HUD Table 11 (in Appendix) entitled *Publicly Supported Housing by Program, Category: Units by Number of Bedrooms and Number of Children*, the supply of publicly supported housing is closely aligned with the needs of families with children. For instance, 29.9% of public housing units are occupied by households with children, and 30.7% of the units are two and three-bedroom units; 28.9% of project-based Section 8 households have children, and 39.1% of the units are two and three-bedroom units; 48.2% of Housing Choice Voucher (HCV) households have children and 53.9% of the HCV units are two and three-bedroom units. The waiting list for both public housing and the Housing Choice Voucher show that one and two bedroom units have the highest demand and are also in the highest supply. Similarly, demand is slightly lower for 3 or more bedroom units and the supply of these units is also slightly lower.

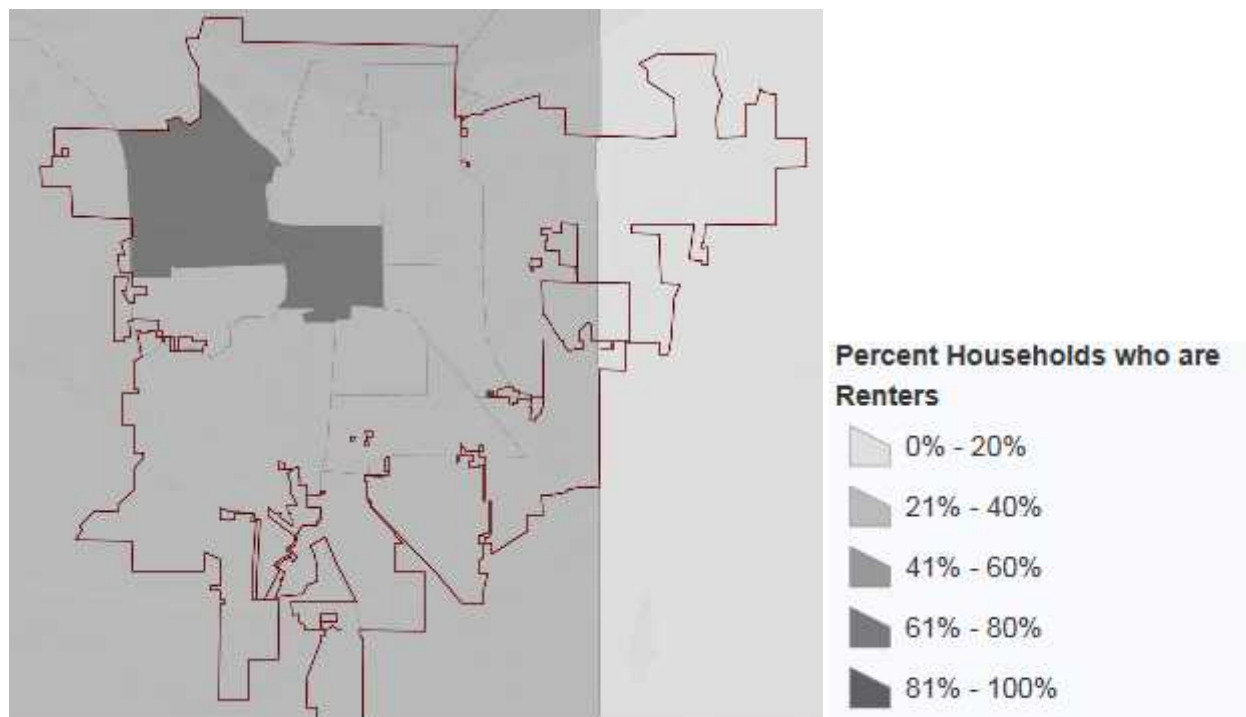
Describe the differences in rates of renter and owner occupied housing by race/ethnicity in the jurisdiction and region.

Homeownership is a means for families to build wealth; that wealth, in turn, can fund educational opportunities, business start-ups, and other activities that increase family wellbeing and long-term economic stability and self-sufficiency. Therefore the disparities in homeownership rates by race and ethnicity are an area for concern in Fond du Lac. Whites (with a homeownership rate

of 61.5%) are significantly more likely to own homes than black residents (6.3%), Hispanics (28%), Asians (12.3%) and Native Americans (17%).

Low homeownership rates are inversely proportionate to the poverty rates in Table 7. The poverty rate of blacks (36.6%) is more than four times that of whites (8.3%); Native Americans (23.5%) and Hispanic (24.0%) poverty rates are more than double that of whites; and Asian Americans (12.5%) have a slightly higher poverty rate than whites.

MAP 10: Fond du Lac Percent Households Who Are Renters



Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the jurisdiction and region affecting groups with other protected characteristics.

There is a significant shortage of affordable housing nationwide and in Fond du Lac. The demand for Housing Choice Vouchers (HCV)²³ is significantly higher than the supply. As of February 2017, there were 356 families on waiting list, and the Housing Authority of the City of Fond du Lac was accepting families off the waiting list from 2015.

The National Low Income Housing Coalition's annual report, *Out of Reach*, documents the gap between wages and the price of housing across the United States. (See Figure 3.) The report's

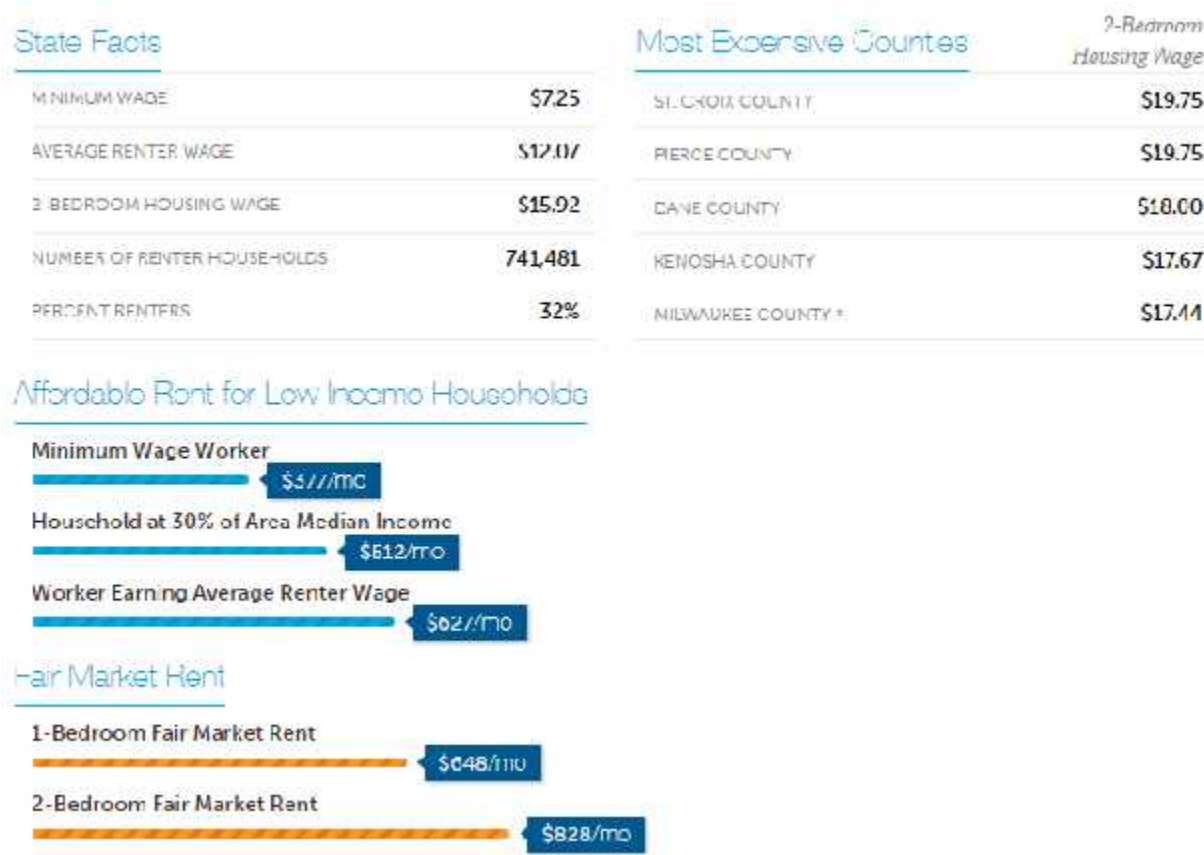
²³ The Housing Choice Voucher program is a federal housing program, formerly called Section 8 rent assistance.

Housing Wage is an estimate of the hourly wage that a full-time worker must earn to afford a modest and safe rental home without spending more than 30% of his or her income on rent and utility costs. The figure below shows the wages and the annual incomes required to afford the average-rent apartment in Fond du Lac County. For instance, a person or household needs to earn \$13.63 an hour or \$28,360 a year to afford a two-bedroom apartment. In contrast, a person making minimum wage can only afford \$377 in rent per month.

FIGURE 3: National Low Income Housing Coalition's Out of Reach Report (Fond du Lac County)

<u>Number of Households</u>	Wisconsin	Fond du Lac County
TOTAL	2,293,250	41,290
RENTER	741,481	11,965
PERCENT RENTERS	32%	29%
<u>Housing Wage</u>	Wisconsin	Fond du Lac County
ZERO-BEDROOM	\$10.59	\$8.94
ONE-BEDROOM	\$12.46	\$10.23
TWO-BEDROOM	\$15.92	\$13.63
THREE-BEDROOM	\$21.03	\$17.73
FOUR-BEDROOM	\$23.35	\$20.48
<u>Fair Market Rent</u>	Wisconsin	Fond du Lac County
ZERO-BEDROOM	\$551	\$465
ONE-BEDROOM	\$640	\$532
TWO-BEDROOM	\$828	\$709
THREE-BEDROOM	\$1,094	\$922
FOUR-BEDROOM	\$1,214	\$1,065
<u>Annual Income Needed to Afford</u>	Wisconsin	Fond du Lac County
ZERO-BEDROOM	\$22,027	\$18,600
ONE-BEDROOM	\$25,924	\$21,280
TWO-BEDROOM	\$33,115	\$28,360
THREE-BEDROOM	\$43,748	\$36,880
FOUR-BEDROOM	\$48,572	\$42,600

FIGURE 3: (Continued) National Low Income Housing Coalition's Out of Reach Report (Fond du Lac County)



Contributing Factors of Disproportionate Housing Needs

Consider factors affecting disproportionate housing needs the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disproportionate housing needs.

Critical shortage of affordable housing in range of unit sizes and limited housing assistance: This section showed that housing cost burden, or spending more than 30% of income on housing costs, is a significant problem for many households in Fond du Lac, particularly African American households. The supply of market rate, affordable housing is insufficient to meet the demand of low and moderate income residents. Additionally, only a fraction of those households that qualify for federally subsidized programs, like public housing and the Housing Choice Voucher program, actually receive that housing assistance.

Publicly Supported Housing Analysis

Demographics

Are certain racial/ethnic groups more likely to be residing in one category of publicly supported housing than other categories (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and Housing Choice Voucher (HCV))?

There are six project-based Section 8 developments in Fond du Lac: Riverview Apartments includes 101 one-bedroom units; Westnor Apartments has 100 one-bedroom units for the elderly; Maplewood Commons has 81 units of varying sizes for families and elderly residents; Oakwood Apartments has 36 units of two- and three-bedrooms; Portland Square has 74 one-bedroom apartments for the elderly; and Lakeside Gardens has 80 units (at 4 different addresses) of two- and three-bedroom units for families.

The three developments with one-bedroom apartments and/or reserved for elderly residents are much less likely to include residents of color. This is possibly due to the younger average age of persons of color. In comparison, Maplewood Commons and Lakeside Gardens, the developments of two- and three-bedrooms, have a much greater proportion black, Hispanic and Asian-American residents.

There are 242 public housing units operated by the Housing Authority of the City of Fond du Lac (HACFdl) in Fond du Lac. Rosalind Apartments and Grand Court Apartments are both multi-unit buildings with one-bedroom apartments. In addition, there are 76 scattered-site, public housing family units made up of two, three, four and five-bedroom units.

Additionally, there are 43 public housing units in North Fond du Lac operated by the Fond du Lac County Housing Authority - 31 one-bedroom units and 12 two-bedroom units at Heather Meadows Apartments.

Compare the demographics, in terms of protected class, of residents of each category of publicly supported housing (public housing, project-based Section 8, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant category of publicly supported housing. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.

Based on their proportions in the general populations (see Table 8 below), Hispanic and white residents are slightly underrepresented in publicly supported housing. Black residents are overrepresented in publicly supported housing by more than four times their rate in Fond du Lac's general population. This rate of African Americans in publicly supported housing is consistent with their proportion of income eligible African American residents.

TABLE 8: Fond du Lac Demographics by Publicly Supported Housing Program Category

	White		Black		Hispanic		Asian	
	supported housing	% FdL	supported housing	% FdL	supported housing	% FdL	supported housing	% FdL
Public Housing	86.4%		8.9%		1.7%		3.0%	
Project-based Section 8	82.7%		10.1%		2.9%		2.9%	
HCV Program	83.0%	87.0%	11.9%	2.0%	4.3%	7.0%	0.3%	1.7%

TABLE 9: Public Housing in Fond du Lac

Public Housing	Bedroom size	# units	# minor children	households w/o minor children (#)	households w/ adult children (#)
Rosalind Apartments	1 Bedroom	135	0		
Grand Court Apartments	1 Bedroom	31	0		
Family units					
All duplexes	2 bedrooms	14	29	2	0
Single family & duplexes	3 bedrooms	33	114	0	1
Single family	4 bedrooms	24	116	0	0
Single family	5 bedroom	5	20	0	0
TOTAL units		242			

Publicly Supported Housing Location and Occupancy

Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas.

According to HUD Maps 1-4 (in Appendix), the northwest part of Fond du Lac has a higher concentration of persons of color and foreign-born persons. This part of the City also has a

considerably higher proportion of rental housing units. The rate of rental units in census tracts 403 (80.0%) and 405 (78.0%), are considerably higher than the city's average of 43.4%.

Census tract 403 contains Westnor Apartments, Grand Court Apartments and 28 family units, all of which are operated by the Housing Authority of the City of Fond du Lac. One building of Lakeside Garden apartments, a project-based Section 8 development, is also located in census tract 403.

Compare the demographics of occupants of developments, for each category of publicly supported housing to the demographic composition of the areas in which they are located. Describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.

The population of Westnor Apartments, in census tract 403, is 95% white. However, the block groups in census tract 403 are more diverse – between 74.4% white and 84.2% white. Lakeside Gardens development (four separate buildings in different census tracts, including tract 403) has a significantly larger proportion of persons of color. According to Lakeside Gardens management, the Lakeside Gardens development is 71.3% white.

Rosalind Apartments (83% white), Portland Square (90% white) and Riverview Apartments (90% white) are located in census tract 405, which ranges from 65.6% to 84.6% white, based on census tract block group. These are all one-bedroom units. HACFdl operates four units of public family housing in census tract 405; two are occupied by black families and two are occupied by white families.

Maplewood Commons (47% white) is in census tract 411, which is 91% white.

Maplewood Commons and Lakeside Gardens have a majority of the large family units. Having such a disproportionate number of persons of color in these two developments may be due to the fact that persons of color are more likely to be a part of a family with children. Fond du Lac can use this as an opportunity to consider siting future multi-family developments in areas with high performing schools, fewer rental housing units, and in areas that will not promote concentration of persons of color.

Contributing Factors of Publicly Supported Housing Location and Occupancy

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.

Lack of cooperation from neighboring communities: Fond du Lac County communities outside the City do not have adequate affordable housing.

WHEDA's Qualified Allocation Plan (QAP): Based on its QAP, WHEDA's priority appears to be "furthering investment in blighted neighborhoods". The unintended consequences of this investment can result in the concentration of LIHTC developments in lower-income parts of Fond du Lac, which can lead to racial and economic segregation.

Passive community opposition: A community's lack of land zoned for multifamily housing is a passive way for a community to limit affordable housing in Fond du Lac County, outside the city of Fond du Lac. While lack of appropriately zoned land is not active opposition, the resulting income and racial segregation are the results.

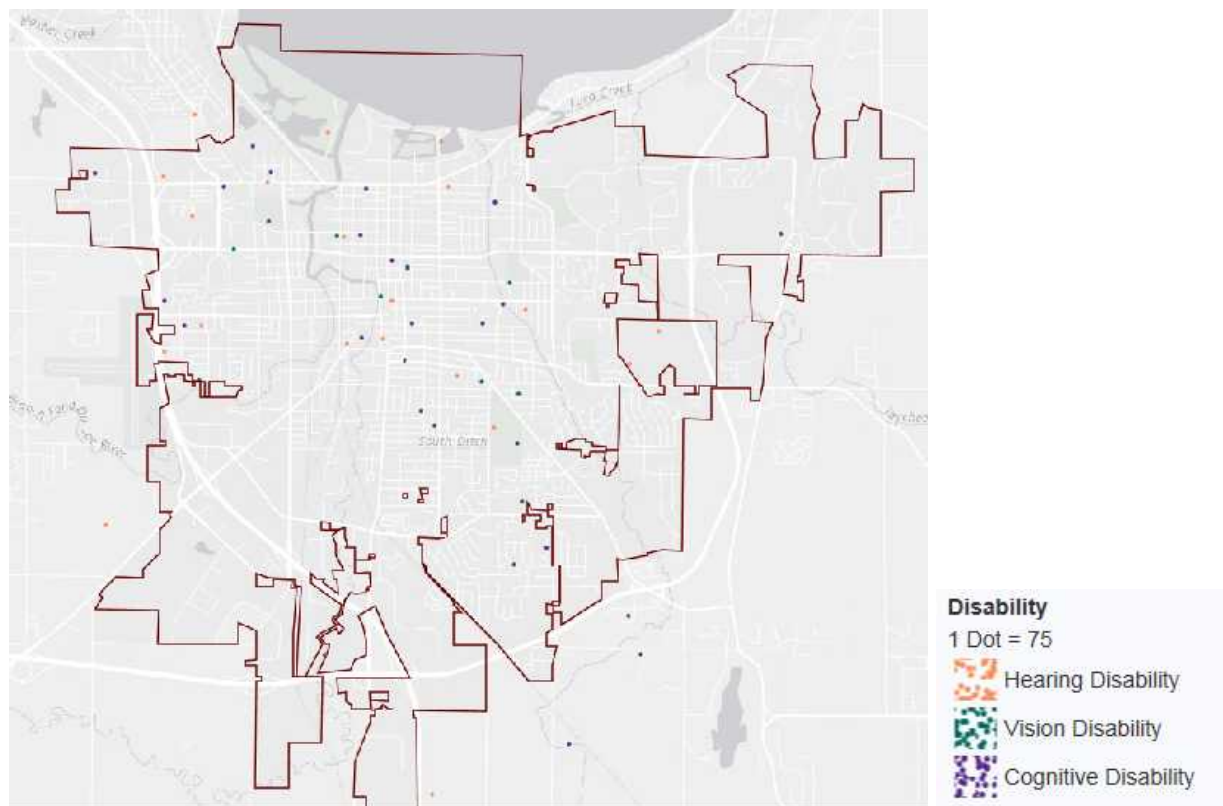
Disability and Access Analysis

Population Profile

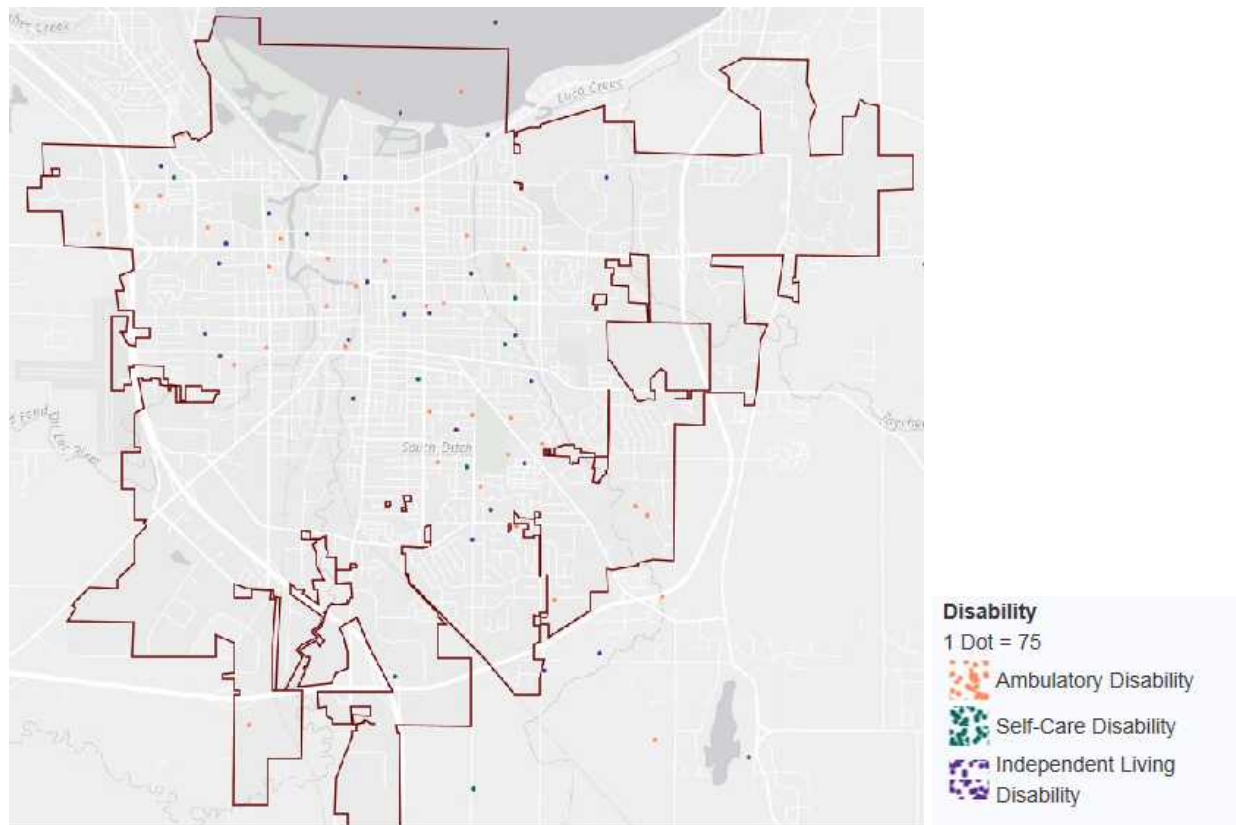
How are persons with disabilities geographically dispersed or concentrated in the jurisdiction and region? Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges.

Approximately 14% of City of Fond du Lac residents age 5 and older have a disability. Of that 14%, 1% is comprised of persons age 5-17; 6.8% are persons age 18-64 and 5.7% are persons 65 years of age and older. The general proportions of persons with disability by age and by census tract mirrors the citywide proportions. (See Maps 11 and 12.)

MAP 11: Fond du Lac Disability by Type (Sensory and Cognitive Disabilities)



Map 12: Fond du Lac Disability by Type (Ambulatory, Self-care and Independent Living Disabilities)



Housing Accessibility

[Describe whether the jurisdiction and region have sufficient affordable, accessible housing.](#)

Many persons with disabilities are in need of affordable housing. Local stakeholders say that access to affordable housing for persons with disabilities poses a significant challenge. As noted previously, the demand for Housing Choice Vouchers (HCVs) is significantly higher than the supply. As of February 2017, there were 356 families on a waiting list, while the Housing Authority of the City of Fond du Lac was accepting families placed on the waiting list two years prior in 2015.

Stakeholders in one-on-one interviews and the community focus group identified that many persons with mental and physical disabilities who are able to obtain publicly-supported housing would rather have a Housing Choice Voucher instead of public housing or project-based rent assistance housing. Additionally, some stakeholders commented that there is discord between elderly tenants and tenants with a disability in public housing.

Persons with disabilities who have low income and are not able to obtain subsidized housing usually have a severe housing cost burden when paying market-rate rent for their accessible housing.

There is limited nationally available data related to accessible housing at this time. But we do know that accessible and affordable housing is most likely to be multifamily housing built for first occupancy after March 1991, because the federal Fair Housing Act requires that most multifamily housing built then and afterward meet a variety of physical accessibility standards. Single family and multifamily housing built before this date is typically not accessible, unless there have been substantial renovations.²⁴

The City of Fond du Lac has 19,530 housing units.²⁵ Of these, 4,727 housing units (nearly a quarter) have been built since 1990.²⁶ 2,033 of these newer units, or 43%, are renter occupied.²⁷ Newer rental housing is more likely to be in a multifamily building and therefore required to have accessible units.

The northwest part of Fond du Lac has considerably higher proportion of rental housing units. This aligns with areas of the City starting to experience a larger proportion of households of color.

[To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing?](#)

Project-based Section 8 housing has the largest proportion of residents with disabilities – 29.6% in the City and 37.8% in the County. Public housing has the next largest proportion – 22% in the City and 23.4% in the County. Finally, the Housing Choice Voucher (HCV) program has the smallest proportion – 21.4% in the City and 20.8% in the County. The HCV program likely has the smallest proportion of participants with a disability because HCV participants are more likely to have access to single family and duplex private-market housing; these types of units are less frequently accessible to persons with a disability.

²⁴ WI Statutes 101.132

²⁵ 2015 American Community Survey, 5-Year Estimates

²⁶ Ibid.

²⁷ Ibid.

Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings

To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?

Neither HUD-provided data nor stakeholder interviews indicated that persons with disabilities are segregated in Fond du Lac.

Describe the range of options for persons with disabilities to access affordable housing and supportive services.

There are insufficient affordable housing options for persons with disabilities. Persons with disabilities are three times more likely (31.8%) to be living in poverty than persons without disabilities (10.5%).²⁸ Therefore, they are three times more likely to be in need of affordable housing than persons without disabilities.

In Fond du Lac County, a person making minimum wage can only afford \$377 in rent per month. There is a shortage of market rate units affordable to lower income persons. Persons with disabilities are also less likely to be employed than the general population. Additionally, there is also a shortage of publicly supported housing to meet the need in Fond du Lac.

According to stakeholders who work with persons with disabilities, Fond du Lac has addressed the supportive services needs of persons with physical and sensory disabilities. In the words of one stakeholder interviewed, “Fond du Lac has been forward thinking on issues around disabilities and preventing persons with disabilities from being institutionalized: the Community Options Program – Fond du Lac piloted this in the 80s. Family Care – Fond du Lac was an early county to take on Family Care. It allows people with disabilities to live in their own home.” This stakeholder went on to say, “Moraine Park Technical College (MPTC) initiatives have been very forward thinking as well. There is a student services office for persons with disabilities.”

Persons with mental illness still struggle to access some of the care they need, particularly access to mental health services. As one stakeholder reported, “People have to wait months to see a psychiatrist in Fond du Lac. If their illness is not stable, it is harder to access housing.”

Further, one stakeholder indicated that persons with mental illness are less likely to own a car and therefore are more likely live in the downtown area for better access to mental health services, transit and affordable rents.

Disparities in Access to Opportunity

²⁸ 2015 American Community Survey, 5-year Estimates

Identify major barriers faced concerning: Government services and facilities, public infrastructure (e.g., sidewalks, pedestrian crossings, and pedestrian signals), transportation, proficient schools and educational programs, jobs

Transit barriers continue to be a challenge for many persons with disabilities. One issue seems to be a misunderstanding: quite simply, many persons with disabilities feel the bus system is inaccessible to them if they don't live close to a bus stop. However, buses will pick up at any corner along their routes, not just at designated bus stops. Additionally, persons with disabilities in outlying parts of Fond du Lac County (Ripon and Campbellsport) lack public transit to the City of Fond du Lac.

Describe the processes that exist in the jurisdiction and region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.

The Housing Authority of the City of Fond du Lac reasonable accommodations/modifications policy is as follows:

Sometimes people with disabilities may need a reasonable accommodation in order to take full advantage of the Fond du Lac County Housing Authority housing programs and related services. When such accommodations are granted they do not confer special treatment or advantage for the person with a disability; rather, they make the program fully accessible to them in a way that would otherwise not be possible due to their disability. This policy clarifies how people can request accommodations and the guidelines the Fond du Lac County Housing Authority will follow in determining whether it is reasonable to provide a requested accommodation. Because disabilities are not always apparent, the Fond du Lac County Housing Authority will ensure that all applicants/participants are aware of the opportunity to request reasonable accommodations.

Legitimate reasonable accommodation requests shall granted if possible and not an undue financial and administrative burden to the Fond du Lac County Housing Authority. If the request is contrary to a HUD regulatory requirement and not an undue burden, the Fond du Lac County Housing Authority shall request a waiver of requirement from HUD.

Because disabilities are not always apparent, the Fond du Lac County Housing Authority will ensure that all applicants/participants are aware of the opportunity to request reasonable accommodations.

In private market housing, consumers are not always aware of their right to request a reasonable accommodation for their disability/ies.

Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities.

As stated previously, persons with disabilities are three times more likely to be living in poverty than persons without disabilities. The median income for persons with disabilities (\$14,866) is about half of that of persons without disabilities (\$28,816). Given these challenges, obtaining a mortgage loan is a significant challenge for many impoverished persons with disabilities. However, existing homeowners may become disabled for a variety of reasons. These individuals may need assistance in making their homes accessible.

Disproportionate Housing Needs

Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities.

Approximately 14% of Fond du Lac residents have a disability; however, disability is not experienced in a race-neutral way. 34.7% of black residents have a disability. 13.8% of whites, 11.8% of Native Americans, 9.8% of Hispanics and 0% of Fond du Lac's Asian Americans have a disability.

TABLE 10: Fond du Lac Persons with Disabilities by Race and Ethnicity

	% with a Disability
White	13.8%
Black	34.7%
NA	11.8%
Asian	0.0%
Hispanic	9.8%

Source: 2015 American Community Survey – 5-Year Estimates

Disability and Access Issues Contributing Factors

Consider factors affecting disability and access in the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disability and access issues and the fair housing issues.

Lack of affordable, accessible housing in range of unit sizes: There is a shortage of affordable housing for all persons. However, persons with disabilities are more likely to have low income and need low cost housing.

Location of accessible housing in County, outside the City: Fond du Lac County communities outside the City are also in need of affordable and accessible housing.

Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

List and summarize any of the following that have **not** been resolved: a charge or letter of finding from HUD concerning a violation of a civil rights-related law, a letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law, or a claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing.

Not applicable.

Describe any state or local fair housing laws. What characteristics are protected under each law?

The Wisconsin Open Housing Law, [Section 106.50 of the Wisconsin Statutes](#), prohibits housing discrimination based on race, color, religion, national origin, ancestry, family status, sex, age, disability, lawful source of income, marital status, sexual orientation, and status as a victim of sexual assault, stalking and/or domestic violence.

Section 307 of the Fond du Lac Municipal Code prohibits discrimination in housing.

The City Council of the City of Fond du Lac hereby adopts by reference § 106.50, Wis. Stats., as amended, and all subsequent amendments thereto. The officials and employees of the City of Fond du Lac shall assist in the orderly prevention and removal of all discrimination in housing within the City of Fond du Lac by implementing the authority and enforcement procedures set forth in § 106.50, Wis. Stats. The City shall maintain forms for complaints to be filed under § 106.50, Wis. Stats., and shall assist any person alleging a violation thereof in the City of Fond du Lac to file a complaint thereunder with the Wisconsin Department of Workforce Development for enforcement of § 106.50, Wis. Stats.

*Violations of § **307-3** shall be subject to the penalties prescribed in § 106.50, Wis. Stats. Violations of § **307-4** shall be subject to the penalties prescribed in § 106.52, Wis. Stats. Other violations of this chapter shall be subject to the following:*

***A.** Any person who willfully violates this chapter or any lawful order issued under this chapter shall, for the first violation, forfeit not less than \$100 nor more than \$1,000.*

***B.** Any person adjudged to have violated this chapter within five years after having been adjudged to have violated this chapter, for every violation committed within the five years, shall forfeit not less than \$1,000 nor more than \$10,000.*

***C.** Payment of a forfeiture under this chapter shall be stayed during the period in which any appeal may be taken and during the pendency of an appeal.*

Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.

The Metropolitan Milwaukee Fair Housing Council (MMFHC) conducts comprehensive fair housing services for the City of Fond du Lac through its Northeast Wisconsin satellite office – the Fair Housing Center of Northeast Wisconsin (FHCNW). Services include:

-) Enforcement Program - conducts intake of housing discrimination complaints, provides complainants with counseling on options for administrative or judicial remedy, and provides investigative services.
-) Outreach and Education Program - conducts fair housing presentations to consumers, advocates, and the general public; provides trainings and technical assistance for housing providers; distributes informational material and makes referrals for non-fair housing inquiries.
-) Fair Lending Program - conducts intake of mortgage rescue scam complaints, provides counseling for complainants, distributes fair lending materials and conducts fair lending presentations.
-) Inclusive Communities Program - offers technical assistance on affirmatively furthering fair housing and pro-integrative housing policies to local policymakers, housing developers and service providers.

Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

Factors that contribute to, perpetuate, or decrease fair housing enforcement, outreach capacity, and resources and the fair housing issues

Lack of resources for fair housing organizations: Given that multiple levels of government have fair housing laws, and that fair housing issues reach across jurisdictional borders, the responsibility to provide and support comprehensive fair housing services rests with many entities. Funding for fair housing activities from the State of Wisconsin and the federal government have remained stagnant or even decreased over the last two decades.

Without increased funding for fair housing work, especially from the state and federal government, the ability of public agencies and private organizations (like the Fair Housing Council) to make effective progress in eliminating unlawful discrimination and creating integrated communities will be unacceptably constrained. Further, without additional investment on the part of State of Wisconsin and the federal government, the City of Fond du Lac's ability to meet its fair housing goals will be hampered.

Fair Housing Goals

The *goals* and *strategies* on the next page address the fair housing Issues and Contributing Factors identified in the previous sections. Fair housing goals include:

1. Expand affordable housing in high opportunity areas through inclusive strategies.
2. Increase housing opportunities for individuals with disabilities.
3. Identify opportunities for rental housing development in underserved areas of the community.
4. Support efforts to reduce racial disparities in the community.
5. Support changes to state and federal policies that impact individuals' abilities to secure housing.
6. Increase homeownership opportunities for potential homebuyers across all races and ethnicities.
7. Increase employment opportunities through community-wide partnerships that work to address barriers.
8. Continue existing funding levels and advocate for increased state and federal funding.

The City and Housing Authorities should use this section as a format for fair housing planning in future consolidated plans, CAPERs, and PHA plans. According to HUD's guidance, "strategies, actions, and the specifics of funding decisions, subject to the consolidated plan, PHA plan, or other applicable planning process are not required to be in the AFH. However, the goals set by program participants (City and Housing Authorities) will factor into these planning processes. These goals form the basis for strategies and actions in subsequent planning documents."

#1

GOALS	STRATEGIES	ISSUE	CONTRIBUTING FACTORS	Time Frame for Action	Measure of Achievement	Responsible Program Participants
Expand affordable housing in high opportunity areas through inclusive strategies	A. Continue economic development efforts.	Cost Exclusion by Race	Housing costs; income; location; age/range of affordable housing	annually	Number of jobs created in CDSC (existing and new regions)	City
	B. Strengthen voluntary programs to assist affordable housing development.			annually	Number of properties listed on CDSC funding and referral	City
	C. Refer affordable housing development to existing programs and agencies.			annually	Number of referrals of affordable housing	NA
	D. Advocate for WMHDL to provide local credit programs in minority neighborhood.			annually	Number of WMHDL loans	City and NA
	E. Continue to assist local credit programs in development for families.			annually	Number of WMHDL loans	City and NA
	F. Advocate for the continued funding to the voucher program.			annually	Number of vouchers issued for families	City
Increase housing opportunities for individuals with disabilities.	A. Partner with the City's Disability Resource Center, Department of Community Programs & ADRC, and other agencies to increase mental health services.	Fair Housing Issues Related to Disability	Housing costs; location; income; age/range of affordable housing	3 years	Number of individuals with disabilities and counseling	City and NA
	B. Continue to assist local credit programs in development for families.			annually	Number of WMHDL loans	City
	C. Continue to assist ADRC's efforts to assist individuals with disabilities in housing.			annually	Number of individuals with disabilities	City
	D. Continue to assist local credit programs in development for families.			annually	Number of WMHDL loans	City

#3

GOALS	STRATEGIES	ISSUE	CONTRIBUTING FACTORS	Time Frame for Action	Measure of Achievement	Responsible Program Participants
Identify opportunities for rental housing development in underserved areas of the community.	A. Advocate for WMHDL to provide local credit programs in minority neighborhood.	Concentration of Rental Housing (publicly subsidized & market rate)	Community Development; local programs; income; location; age/range of affordable housing	annually	Number of WMHDL loans	City and NA
	B. Continue to assist local credit programs in development for families.			annually	Number of WMHDL loans	City and NA
	C. Continue to assist local credit programs in development for families.			annually	Number of WMHDL loans	City and NA
	D. Continue to assist local credit programs in development for families.			annually	Number of WMHDL loans	City and NA
	E. Continue to assist local credit programs in development for families.			annually	Number of WMHDL loans	City and NA
	F. Continue to assist local credit programs in development for families.			annually	Number of WMHDL loans	City and NA
Support efforts to reduce racial disparities in the community.	A. Continue to assist local credit programs in development for families.	Racial Disparity in Educational Achievement	Community Development; local programs; income; location; age/range of affordable housing	annually	Number of WMHDL loans	City and NA
	B. Continue to assist local credit programs in development for families.			annually	Number of WMHDL loans	City and NA
	C. Continue to assist local credit programs in development for families.			annually	Number of WMHDL loans	City and NA
	D. Continue to assist local credit programs in development for families.			annually	Number of WMHDL loans	City and NA

Appendices:

Appendix A – HUD-Tables

Appendix B – HUD Maps

Appendix C- Stakeholder Comments

Appendix D- Fond du Lac Lending Analyses

Appendix A: HUD TABLES

Table 1: Demographics

	(Fond Du Lac, WI CDBG) Jurisdiction		(Fond du Lac, WI) Region			
Race/Ethnicity	#	%	#	%		
White, Non-Hispanic	31,582	87.2%	13,308	91.90%		
Black, Non-Hispanic	716	1.99%	1,226	1.21%		
Hispanic	1,530	4.09%	4,368	4.30%		
Asian or Pacific Islander, Non-Hispanic	616	1.66%	1,140	1.13%		
Native American, Non-Hispanic	100	0.55%	422	0.42%		
Two or More Races, Non-Hispanic	562	1.55%	1,029	1.01%		
Other, Non-Hispanic	13	0.04%	75	0.04%		
National Origin						
#1 country of origin	Mexico	1,109	7.75%	Mexico	1,737	1.81%
#2 country of origin	India	271	0.67%	India	200	0.32%
#3 country of origin	Honduras	140	0.37%	Germany	170	0.29%
#4 country of origin	Germany	108	0.27%	Honduras	148	0.18%
#5 country of origin	China and Hong Kong & Taiwan	92	0.23%	China and Hong Kong & Taiwan	106	0.11%
#6 country of origin	Canada	88	0.18%	Thailand	87	0.08%
#7 country of origin	Greece	52	0.13%	Canada	83	0.09%
#8 country of origin	Thailand	50	0.12%	Korea	58	0.06%
#9 country of origin	Japan	36	0.08%	Russia	57	0.06%
#10 country of origin	Colombia	25	0.07%	Greece	55	0.06%
Limited English Proficiency (LEP) Language						
#1 LEP Language	Spanish	280	2.43%	Spanish	1,604	1.67%
#2 LEP Language	Chinese	80	0.20%	German	125	0.13%
#3 LEP Language	Hmong	40	0.13%	Chinese	80	0.08%
#4 LEP Language	Greek	18	0.05%	Hmong	73	0.08%
#5 LEP Language	Hindi	32	0.08%	Greek	38	0.04%
#6 LEP Language	German	28	0.07%	Hind	52	0.05%
#7 LEP Language	French	73	0.09%	French	71	0.07%
#8 LEP Language	Japanese	2	0.02%	Russian	20	0.02%
#9 LEP Language	Other West Germanic language	7	0.02%	Croatian	15	0.02%
#10 LEP Language	Korean	4	0.02%	Japanese	34	0.03%
Disability Type						
Hearing difficulty	1,508	3.88%	3,538	5.18%		
Vision difficulty	738	1.90%	1,668	1.76%		
Cognitive difficulty	3,077	5.34%	3,779	4.01%		
Amblulatory difficulty	2,858	7.35%	5,661	5.00%		
Self-care difficulty	784	2.02%	1,247	2.07%		
Independent living difficulty	1,853	4.78%	3,667	3.93%		
Sex						
Male	17,726	48.93%	48,226	48.12%		
Female	18,707	51.07%	51,707	50.88%		
Age						
Under 18	8,373	23.29%	13,204	22.67%		
25-64	22,240	62.25%	65,394	62.26%		
65+	5,970	16.46%	15,235	14.88%		
Family Type						
Families with children	4,162	4.693%	11,384	42.17%		

Note 1: All % represent as share of the total population within the jurisdiction or region, except family type, which is out of total families.

Note 2: 10 most populous places of birth and languages at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.

Note 3: Data Sources: Decennial Census, ACS

Note 4: Refer to the Data Documentation on datais www.hudexchange.info/.

Table 2 - Demographic Trends

	(Fond Du Lac, WI CDBG) Jurisdiction				(Fond du Lac, WI) Region			
	1990 Trend	2000 Trend	2010 Trend	Current	1990 Trend	2000 Trend	2010 Trend	Current
Racial/Ethnicity								
White, Non-Hispanic	37,505 95.9%	38,801 95.2%	37,695 93.17%	37,332 92.2%	38,145 97.6%	32,522 91.1%	33,398 91.9%	33,398 91.9%
Black, Non-Hispanic	111 0.3%	121 0.3%	1,153 2.9%	713 1.8%	133 0.3%	1,351 3.7%	1,701 4.6%	1,126 2.8%
Hispanic	363 0.9%	1,174 2.9%	2,659 6.7%	3,533 8.9%	177 0.5%	551 1.5%	4,368 11.6%	4,368 11.6%
Asian or Pacific Islander, Non-Hispanic	293 0.7%	705 1.7%	35 0.1%	608 1.6%	121 0.3%	1,313 3.7%	1,372 3.6%	1,145 2.9%
Native American, Alaska Native, or Other	175 0.4%	547 1.4%	392 0.9%	359 0.9%	525 1.3%	1,361 3.8%	757 2.0%	422 1.1%
Hispanic or Latin American	538 1.4%	1,719 4.3%	3,167 8.0%	3,900 9.8%	702 1.8%	1,915 5.2%	6,143 16.1%	6,515 16.7%
Latino, English-Speaking	485 1.2%	892 2.3%	1,002 2.6%	1,174 2.9%	1,353 3.5%	1,467 4.1%	1,905 5.1%	2,123 5.4%
Latino, Spanish-Speaking	45 0.1%	127 0.3%	1,165 2.9%	1,726 4.4%	349 0.9%	448 1.2%	4,238 11.2%	4,392 11.3%
Age								
Under 18	18,128 46.0%	18,117 45.2%	14,619 36.9%	17,753 45.9%	18,948 48.4%	17,341 48.7%	18,926 48.1%	18,926 48.1%
18-64	20,061 50.8%	21,016 51.3%	21,494 54.7%	21,916 55.0%	19,111 48.6%	21,011 56.6%	21,312 55.1%	21,312 55.1%
65+	10,160 25.1%	10,542 26.4%	8,376 21.3%	8,200 20.9%	9,884 25.1%	9,569 26.6%	9,094 23.6%	9,094 23.6%
Median Age	35.40	35.17	33.54	33.14	33.11	33.26	32.70	32.73
Family Size	3.17	3.19	3.00	3.00	3.15	3.13	3.07	3.07
Family with children	5,551 13.7%	5,732 14.5%	4,164 10.5%	4,164 10.5%	5,140 13.2%	5,171 14.7%	4,104 10.7%	4,104 10.7%

Note 1: All percentages are based on the total population within the jurisdiction or region for each year, except family size, which is based on the total family.

Note 2: Data Sources: American Census, 2010.

Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

Table 3 - Racial/Ethnic Dissimilarity Trends

Racial/Ethnic Dissimilarity Index	(Fond Du Lac, WI CDBG) Jurisdiction				(Fond du Lac, WI) Region			
	1990 Trend	2000 Trend	2010 Trend	Current	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	19.11	21.91	20.16	25.13	21.21	26.51	22.15	23.83
Black/White	70.63	38.39	21.28	33.53	49.36	46.85	34.87	31.51
Hispanic/White	34.77	27.33	26.06	23.11	26.66	23.74	24.14	23.90
Asian or Pacific Islander/White	33.01	32.01	18.12	34.93	31.21	36.24	23.73	24.74

Note 1: Data sources: Decennial Census.

Note 2: Refer to the Data Documentation for details (www.hudexchange.info).

Table 4 - R/FCAP Demographics

	(Fond Du Lac, WI CDBG) Jurisdiction		(Fond Du Lac, WI) Region	
	#	%	#	%
R/FCAP Race/Ethnicity				
Total Population in R/FCAPs	0	-	0	-
White, Non-Hispanic	0	N/a	0	N/a
Black, Non-Hispanic	0	N/a	0	N/a
Hispanic	0	N/a	0	N/a
Asian or Pacific Islander, Non-Hispanic	0	N/a	0	N/a
Native American, Non-Hispanic	0	N/a	0	N/a
Other, Non-Hispanic	0	N/a	0	N/a
R/FCAP Family Type				
Total Families in R/FCAPs	0		0	
Families with children	0	N/a	0	N/a
R/FCAP National Origin				
Total Population in R/FCAPs	0	-	N/a	-
#1 country of origin	0	0.00%	0	0.00%
#2 country of origin	0	0.00%	0	0.00%
#3 country of origin	0	0.00%	0	0.00%
#4 country of origin	0	0.00%	0	0.00%
#5 country of origin	0	0.00%	0	0.00%
#6 country of origin	0	0.00%	0	0.00%
#7 country of origin	0	0.00%	0	0.00%
#8 country of origin	0	0.00%	0	0.00%
#9 country of origin	0	0.00%	0	0.00%
#10 country of origin	0	0.00%	0	0.00%
Note 1: Total population provided for jurisdiction level may not be the same as the total population of the Region as it only includes the data collected separately.				
Note 2: Data Sources: Decennial Census; ACS				
Note 3: Refer to the Data Documentation for details (www.hudexchange.info).				

Table 5 - Publicly Supported Housing Units by Program Category

	(Fond Du Lac, WI CDBG) Jurisdiction	
	#	%
Housing Units		
Total housing units	16,499	-
Public Housing	242	1.47%
Project-based Section 8	472	2.86%
Other Multifamily	N/a	N/a
HCV Program	369	2.24%
Note 1: Data Sources: Decennial Census; APSH		
Note 2: Refer to the Data Documentation for details (www.hudexchange.info).		

Table 6 - Publicly Supported Households by Race/Ethnicity

(Fond Du Lac, WI CDBG) Jurisdiction	Race/Ethnicity							
	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
Public Housing	194	82.20%	28	11.86%	7	2.92%	7	2.97%
Project-Based Section 8	52	79.6%	63	14.00%	17	2.72%	8	1.78%
Other Multifamily	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
HCY Program	287	81.53%	49	13.92%	16	4.35%	0	0.00%
Total Households	10,750	91.48%	294	2.61%	778	4.25%	224	1.22%
0-30% of AM	1,715	84.60%	00	4.44%	120	5.37%	20	0.09%
0-50% of AM	3,330	78.91%	120	2.81%	239	5.66%	21	0.57%
0-80% of AM	6,170	83.72%	184	2.50%	394	5.35%	39	0.30%
(Fond du Lac, WI) Region	White		Black		Hispanic		Asian or Pacific Islander	
	#	%	#	%	#	%	#	%
	#	%	#	%	#	%	#	%
Public Housing	194	82.20%	28	11.86%	7	2.92%	7	2.97%
Project-Based Section 8	52	79.6%	63	14.00%	17	2.72%	8	1.78%
Other Multifamily	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
HCY Program	343	82.45%	55	13.22%	18	4.33%	0	0.00%
Total Households	38,390	94.49%	329	0.80%	1,219	2.95%	278	0.57%
0-30% of AM	3,715	87.60%	00	2.80%	175	5.45%	24	0.75%
0-50% of AM	5,405	74.09%	120	1.61%	349	4.78%	28	0.38%
0-80% of AM	11,465	83.08%	209	1.51%	569	4.12%	93	0.57%

Note 1: Data Sources: Decennial Census; APSH; CHAS

Note 2: #s presented are numbers of households not individuals.

Note 3: Refer to the Data Documentation for details (www.hudexchange.info/).

Table 7 - R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category

(Fond Du Lac, WI CDBG) Jurisdiction	Total # units (occupied)	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with children	% Elderly	% with a disability
Public Housing								
R/ECAP tracts	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Non R/ECAP tracts	284	82.21%	11.86%	2.92%	2.97%	58.55%	25.64%	23.33%
Project-based Section 8								
R/ECAP tracts	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Non R/ECAP tracts	451	79.55%	14.01%	3.78%	1.73%	52.55%	32.47%	35.36%
Other HUD Multifamily								
R/ECAP tracts	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Non R/ECAP tracts	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
HCY Program								
R/ECAP tracts	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Non R/ECAP tracts	313	81.53%	13.92%	4.35%	0.00%	43.90%	15.78%	23.50%

Note: Data Source: HUD Exchange

Note 3: Refer to the Data Documentation for details (www.hudexchange.info/).

Table 8 - Demographics of Publicly Supported Housing Developments, by Program Category

Public Housing								
(Fond Du Lac, WI CDBG) Jurisdiction								
Development Name	PHA Code	PHA Name	# Units	White	Black	Hispanic	Asian	Households with Children
Rosalind Apartments	W1088	Fond Du Lac Housi	242	83%	12%	3%	3%	29%

Project-Based Section 8								
(Fond Du Lac, WI CDBG) Jurisdiction								
Development Name	PHA Code	PHA Name	# Units	White	Black	Hispanic	Asian	Households with Children
Riverview Apartments	N/a	N/a	101	90%	8%	8%	1%	N/a
Westnor Apartments	N/a	N/a	100	92%	8%	3%	N/a	N/a
Maplewood Commons	N/a	N/a	81	46%	35%	10%	7%	80%
Oakwood/Portland Square	N/a	N/a	110	90%	10%	0%	N/a	16%
Lakeside Gardens	N/a	N/a	80	62%	23%	8%	4%	91%

Note 1: For LIHTC properties, this information will be supplied by local knowledge.

Note 2: Percentages may not add to 100 due to rounding error.

Note 3: Data Source: APSH

[Note 4: Refer to the Data Documentation for details \(www.hudexchange.info\).](http://www.hudexchange.info)

Table 9: Demographics of Households with Disproportionate Housing Needs

Disproportionate Housing Needs Households experiencing any of 4 housing problems	(Fond du Lac, WI CDBG) Jurisdiction			(Fond du Lac, WI) Region		
	# with problems	# households	% with problems	# with problems	# households	% with problems
Race/Ethnicity						
White, Non-Hispanic	5,188	16,711	31.01%	7,761	31,991	24.21%
Black, Non-Hispanic	124	224	55.36%	124	329	37.69%
Hispanic	49	228	21.49%	591	1,919	30.85%
Asian or Pacific Islander, Non-Hispanic	64	224	28.57%	98	278	35.25%
Native American, Non-Hispanic	65	110	59.09%	77	171	45.03%
Other, Non-Hispanic	44	148	29.73%	100	277	36.10%
Total	5,439	17,210	31.59%	11,651	41,265	28.24%
Household Type and Size						
Family households <= 5 people	2,615	9,755	26.71%	3,293	26,394	12.46%
Family households > 5 people	411	1,211	33.93%	1,011	4,964	20.37%
Nonfamily households	3,270	7,025	46.40%	7,395	10,005	73.67%
Households experiencing any of 3 Severe Housing Problems						
	# with severe problems	# households	% with severe problems	# with severe problems	# households	% with severe problems
Race/Ethnicity						
White, Non-Hispanic	2,580	16,750	15.43%	4,730	33,990	13.91%
Black, Non-Hispanic	121	251	48.21%	124	329	37.69%
Hispanic	254	770	32.99%	954	1,219	78.26%
Asian or Pacific Islander, Non-Hispanic	21	224	9.38%	28	278	10.07%
Native American, Non-Hispanic	11	110	10.00%	14	171	8.19%
Other, Non-Hispanic	10	148	6.76%	57	277	20.58%
Total	3,096	17,210	17.81%	6,807	41,265	16.48%

Note 1: The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.

Note 2: A 10% represents a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Note 3: Data Sources: CHRS

Note 4: Refer to the Data Documentation for details (www.hudaction.org/info).

Table 10: Demographics of Households with Severe Housing Cost Burden

Households with Severe Housing Cost Burden	(Fond du Lac, WI CDBG) Jurisdiction			(Fond du Lac, WI) Region		
	# with severe cost burden	# households	% with severe cost burden	# with severe cost burden	# households	% with severe cost burden
Race/Ethnicity						
White, Non-Hispanic	2,110	16,711	12.60%	4,273	31,991	13.36%
Black, Non-Hispanic	125	254	49.21%	124	329	37.69%
Hispanic	88	770	11.44%	133	1,219	10.91%
Asian or Pacific Islander, Non-Hispanic	30	224	13.40%	34	278	12.23%
Native American, Non-Hispanic	11	110	10.00%	14	171	8.19%
Other, Non-Hispanic	10	148	6.76%	55	277	19.86%
Total	2,454	17,210	14.26%	4,633	41,265	11.23%
Household Type and Size						
Family households <= 5 people	950	9,755	9.74%	1,504	26,394	5.69%
Family households > 5 people	84	1,211	6.93%	139	4,964	2.80%
Nonfamily households	1,420	7,025	20.31%	2,990	10,005	29.88%

Note 1: Severe housing cost burden is defined as greater than 50% of income.

Note 2: A 10% represents a share of the total population within the jurisdiction or region, except household type and size, which is out of total households.

Note 3: # of households is the denominator for the % with problems, and may differ from the # of households for the table on severe housing problems.

Note 4: Data Sources: CHRS

Note 5: Refer to the Data Documentation for details (www.hudaction.org/info).

Table 11 – Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children

	(Fond du Lac, WI CDBG) Jurisdiction							
	Households in 0-1 Bedroom		Households in 2 Bedroom		Households in 3+ Bedroom		Households with Children	
	Units		Units		Units			
Housing Type	#	%	#	%	#	%	#	%
Public Housing	151	11.00%	14	5.00%	51	24.71%	67	20.61%
Project-based Section 8	170	12.44%	54	19.91%	91	21.21%	191	32.61%
Other Multifamily	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
HOV Program	170	27.00%	124	33.60%	67	17.12%	167	43.97%

Note 1: Data Sources: AFSH

Note 2: Refer to the Data Documentation for details (www.fundexchangeinfo.org).

Table 12 – Opportunity Indicators, by Race/Ethnicity

(Fond du Lac, WI CDBG) Jurisdiction	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Productivity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	54.60	50.60	57.55	26.13	67.78	55.32	59.57
Black, Non-Hispanic	41.52	55.57	47.71	26.55	65.51	63.31	65.77
Hispanic	43.62	17.40	41.33	27.47	65.67	63.34	61.52
Asian or Pacific Islander, Non-Hispanic	57.85	58.04	52.75	25.67	67.71	65.76	71.42
Native American, Non-Hispanic	53.00	17.72	51.32	26.25	61.00	61.54	66.37
Population below federal poverty line							
White, Non-Hispanic	43.24	40.25	50.13	27.23	64.15	63.34	61.30
Black, Non-Hispanic	37.06	37.30	34.70	28.22	71.07	63.20	59.74
Hispanic	37.60	55.52	47.37	28.12	73.51	55.07	63.29
Asian or Pacific Islander, Non-Hispanic	15.00	25.00	41.33	20.13	73.11	75.75	68.33
Native American, Non-Hispanic	43.89	36.20	45.32	27.27	61.49	55.15	55.55
(Fond du Lac, WI Region)							
Total Population							
White, Non-Hispanic	63.36	15.00	67.33	19.67	65.50	55.37	62.37
Black, Non-Hispanic	53.77	35.57	57.57	23.77	55.74	67.34	77.33
Hispanic	52.45	37.40	55.77	28.43	55.55	65.50	71.00
Asian or Pacific Islander, Non-Hispanic	63.04	16.34	61.75	22.13	72.11	63.36	75.25
Native American, Non-Hispanic	61.52	27.72	55.77	22.13	72.22	61.55	76.77
Population below federal poverty line							
White, Non-Hispanic	55.99	48.77	58.55	22.13	57.46	57.31	75.71
Black, Non-Hispanic	43.30	42.05	41.33	25.54	63.11	63.36	67.23
Hispanic	47.70	47.45	55.55	24.77	57.77	57.44	77.71
Asian or Pacific Islander, Non-Hispanic	17.77	17.00	41.33	24.54	62.64	77.72	75.53
Native American, Non-Hispanic	55.89	57.75	67.45	20.67	57.67	55.71	77.43

Note 1: Data Sources: Decennial Census; ACS; Great Schools; Wisconsin Core of Data; SAE; US LRA; LEHD; DATA.

Note 2: Refer to the Data Documentation for details (www.fundexchangeinfo.org).

Table 13 - Disability by Type

	(Fond Du Lac, WI CDBG) Jurisdiction		(Fond du Lac, WI) Region	
Disability Type	#	%	#	%
Hearing difficulty	1,530	3.00%	3,500	3.70%
Vision difficulty	738	1.90%	1,653	1.76%
Cognitive difficulty	2,077	5.34%	3,773	4.01%
Ambulatory difficulty	2,858	7.35%	5,651	6.01%
Self-care difficulty	734	2.02%	1,947	2.07%
Independent living difficulty	1,851	4.76%	3,697	3.93%

Note 1: All % represent a share of the total population within the jurisdiction or region.

Note 2: Data Sources: ACS

Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

Table 14 - Disability by Age Group

	(Fond Du Lac, WI CDBG) Jurisdiction		(Fond du Lac, WI) Region	
Age of People with Disabilities	#	%	#	%
age 5-17 with Disabilities	393	1.01%	840	0.89%
age 18-64 with Disabilities	2,693	6.93%	5,292	5.62%
age 65+ with Disabilities	2,372	6.10%	4,563	5.27%

Note 1: All % represent a share of the total population within the jurisdiction or region.

Note 2: Data Sources: ACS

Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

Table 15 - Disability by Publicly Supported Housing Program Category

(Fond Du Lac, WI CDBG) Jurisdiction	People with a Disability	
	#	%
Public Housing	56	23.93%
Project-Based Section 8	168	36.36%
Other Multifamily	N/a	N/a
HCV Program	76	20.60%
(Fond du Lac, WI) Region		
Public Housing	56	23.93%
Project-Based Section 8	168	36.36%
Other Multifamily	N/a	N/a
HCV Program	86	20.05%
<p>Note 1: The definition of "disability" used by the Census Bureau may not be comparable to reporting requirements under HUD programs.</p> <p>Note 2: Data Sources: ACS</p> <p>Note 3: Refer to the Data Documentation for details (www.hudexchange.info).</p>		

Table 16 - Homeownership and Rental Rates by Race/Ethnicity

Race/Ethnicity	(Fond Du Lac, WI CDBG) Jurisdiction				(Fond du Lac, WI) Region			
	Homeowners		Renters		Homeowners		Renters	
	#	%	#	%	#	%	#	%
White, Non-Hispanic	10,045	96.91%	6,705	84.39%	28,365	97.21%	10,630	87.96%
Black, Non-Hispanic	15	0.14%	280	3.52%	25	0.09%	305	2.52%
Hispanic	135	1.30%	650	8.18%	420	1.44%	800	6.67%
Asian or Pacific Islander, Non-Hispanic	100	0.96%	125	1.57%	150	0.51%	125	1.03%
Native American, Non-Hispanic	10	0.10%	100	1.26%	65	0.22%	110	0.91%
Other, Non-Hispanic	60	0.58%	85	1.07%	155	0.53%	115	0.95%
Total Household Units	10,365	-	7,945	-	29,180	-	12,085	-

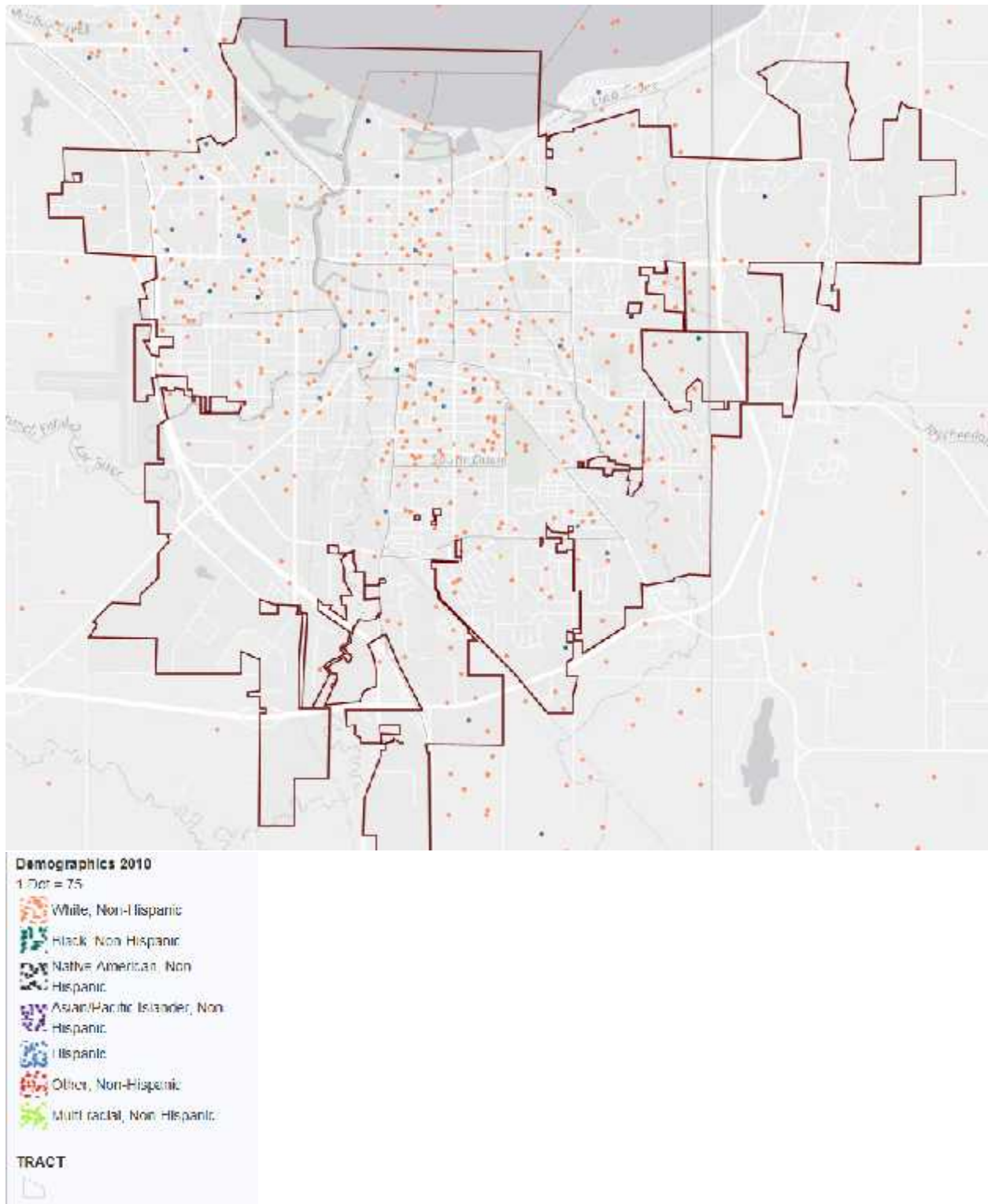
Note 1: Data presented are numbers of households, not individuals.

Note 2: Data Sources: CHAS

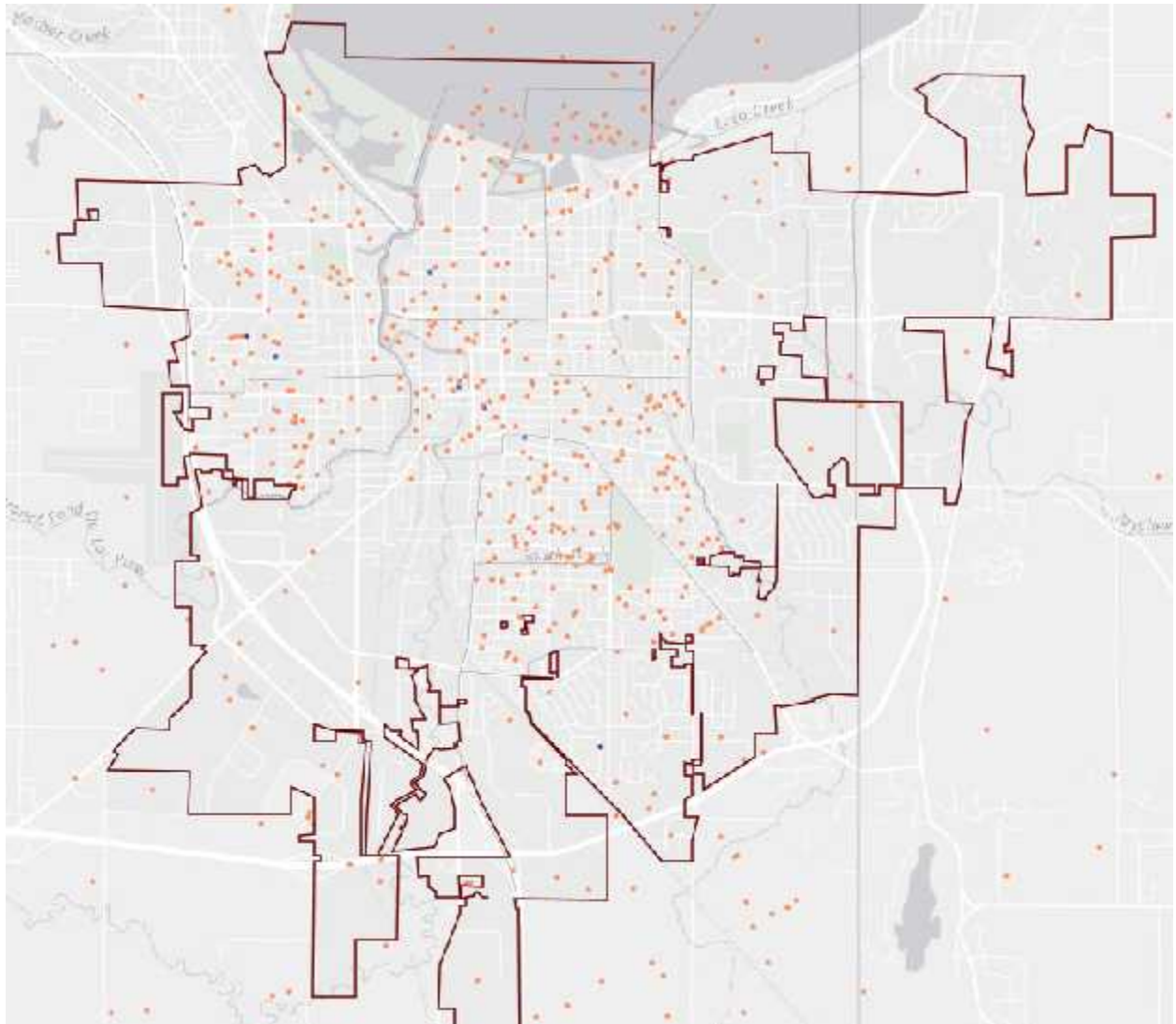
Note 3: Refer to the Data Documentation for details (www.hudexchange.info).

Appendix B: HUD MAPS

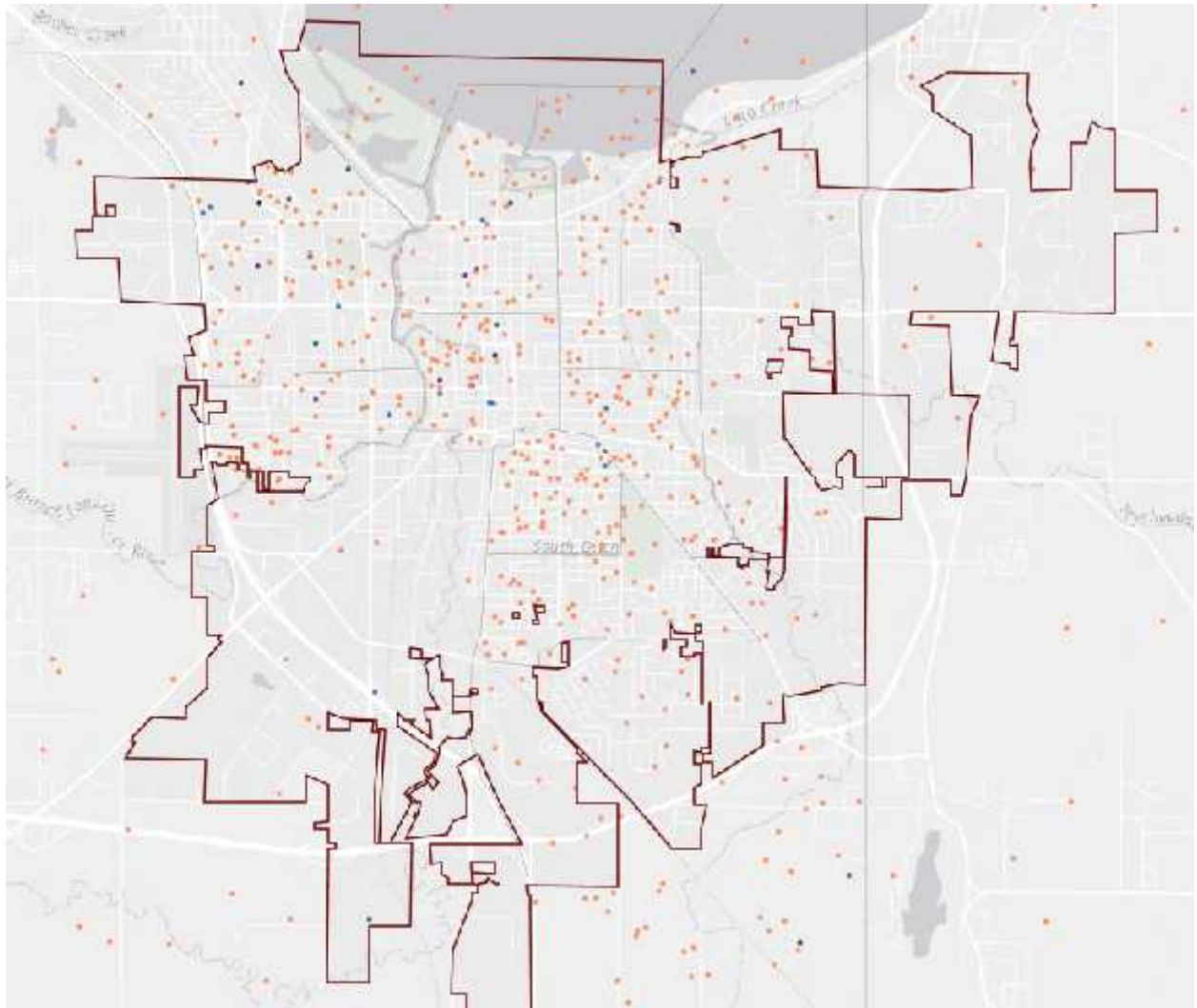
1 2010 Race and Ethnicity



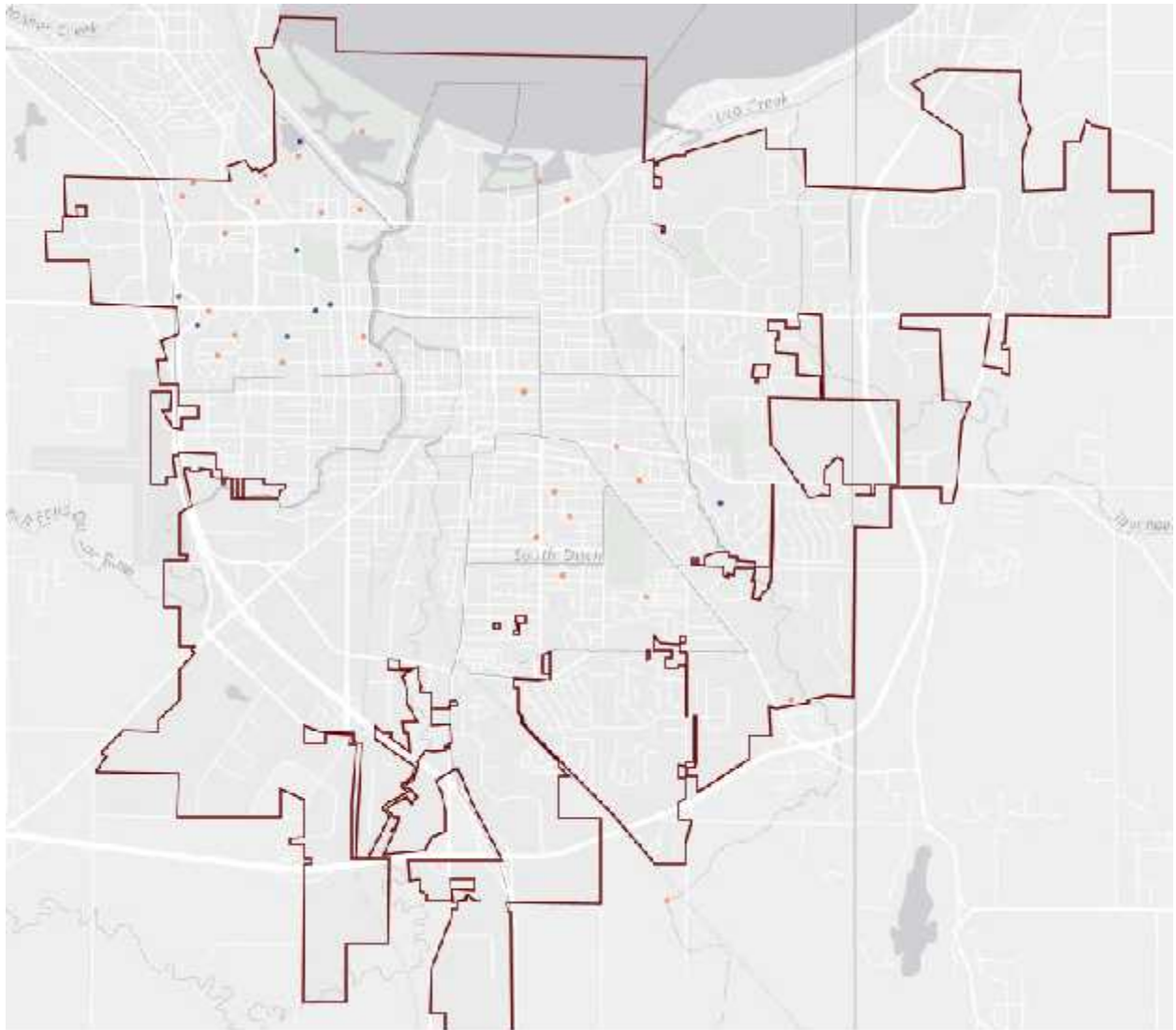
Map 2a 1990 Race and Ethnicity



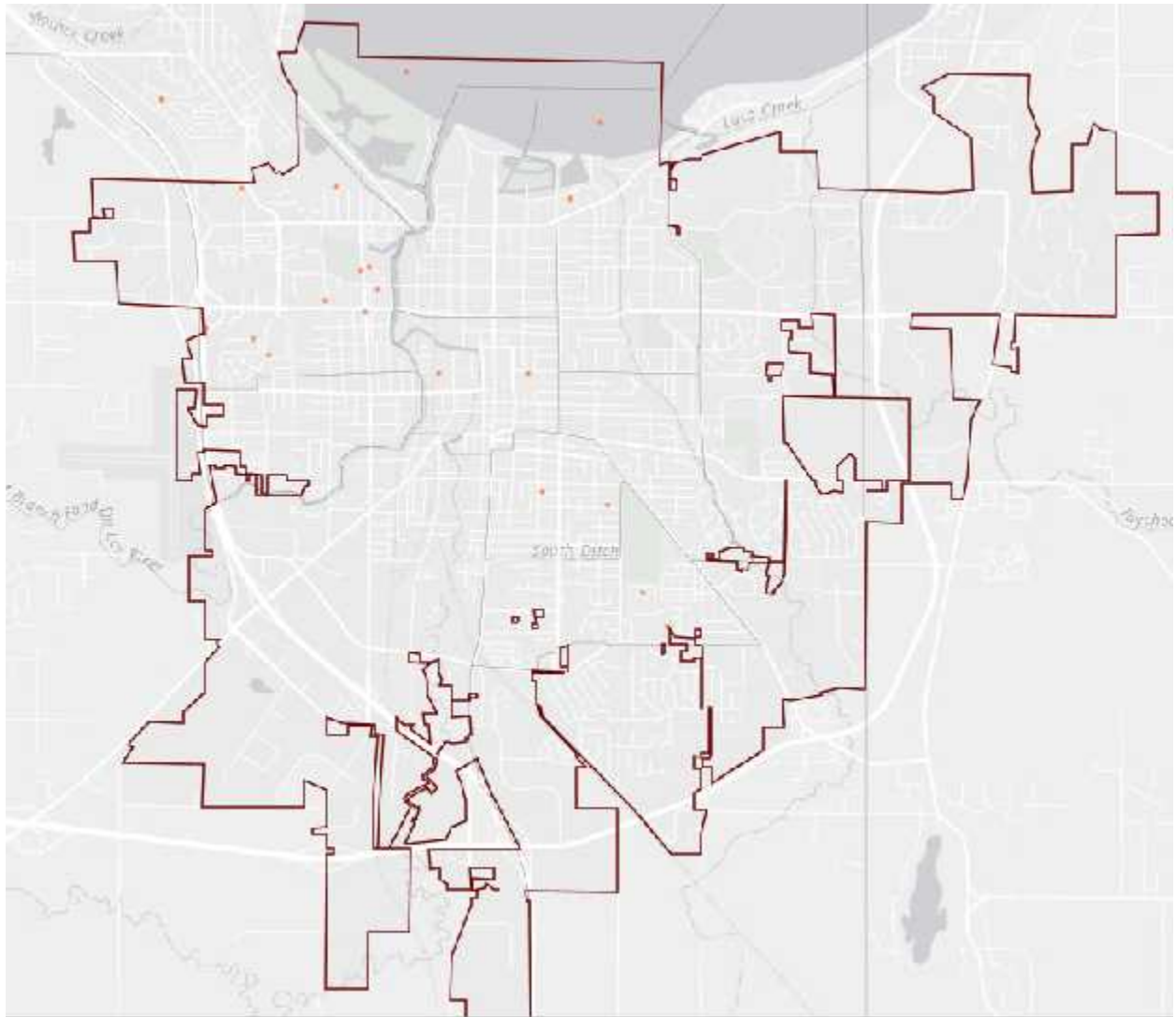
Map 2b 2000 Race and Ethnicity



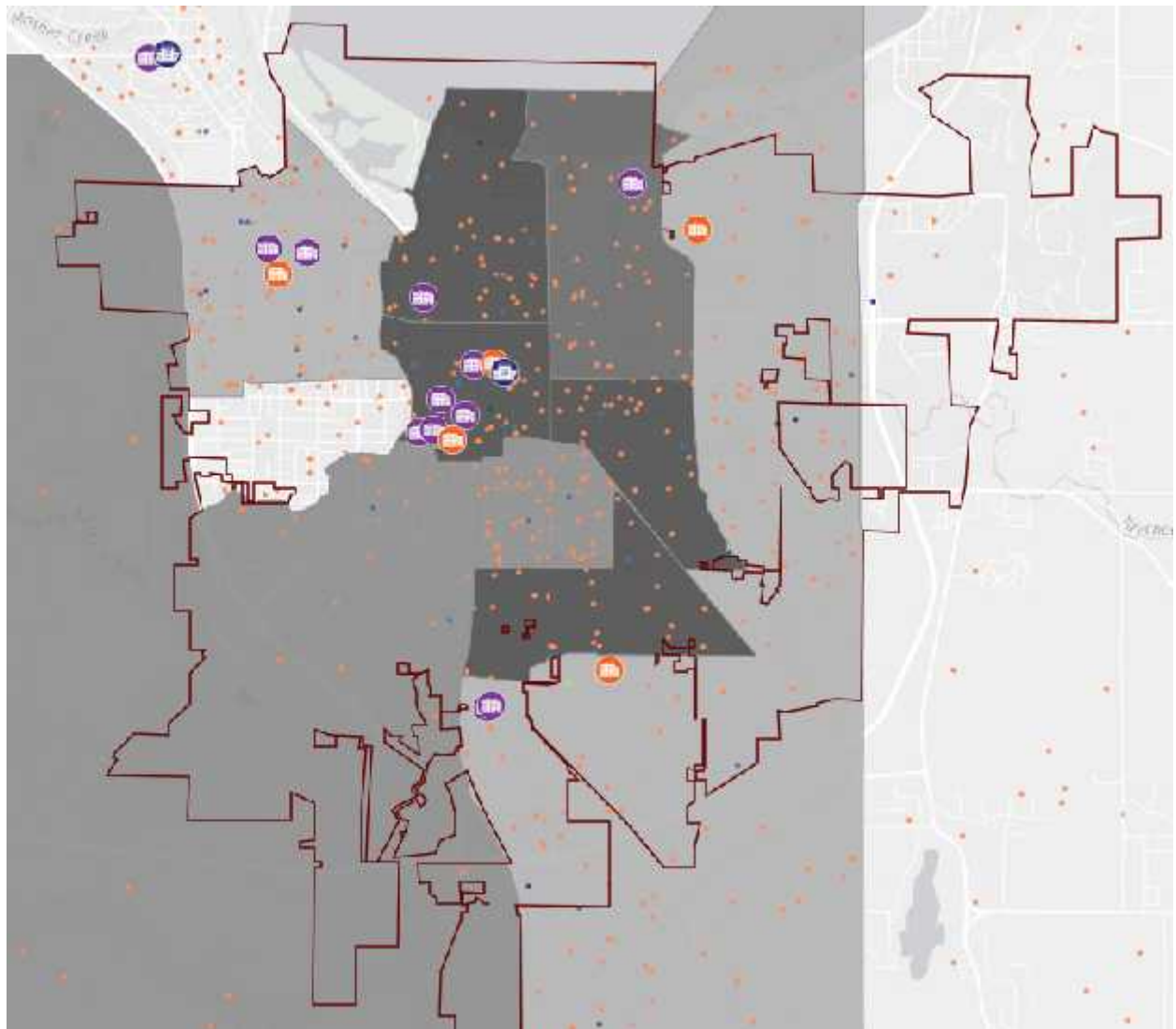
Map 3 National Origin



Map 4 LEP



Map 5 Publicly Supported Housing



Public Housing



Other Multifamily



Project-Based Section 8



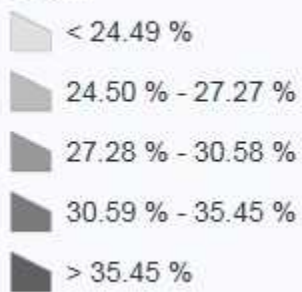
Low Income Housing Tax Credit



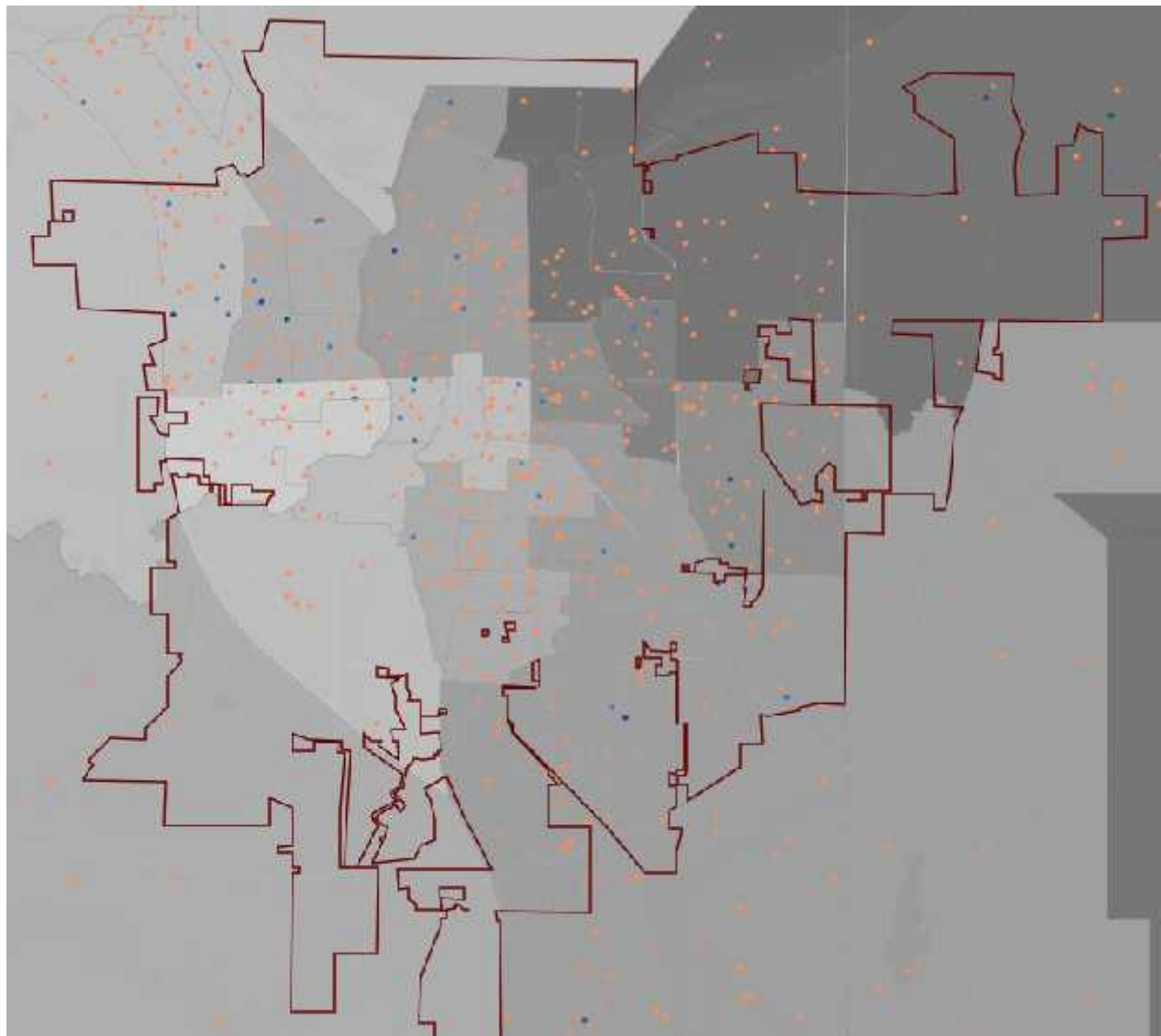
Map 6 Housing Problems



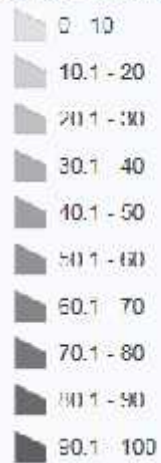
Percent Households with Burden



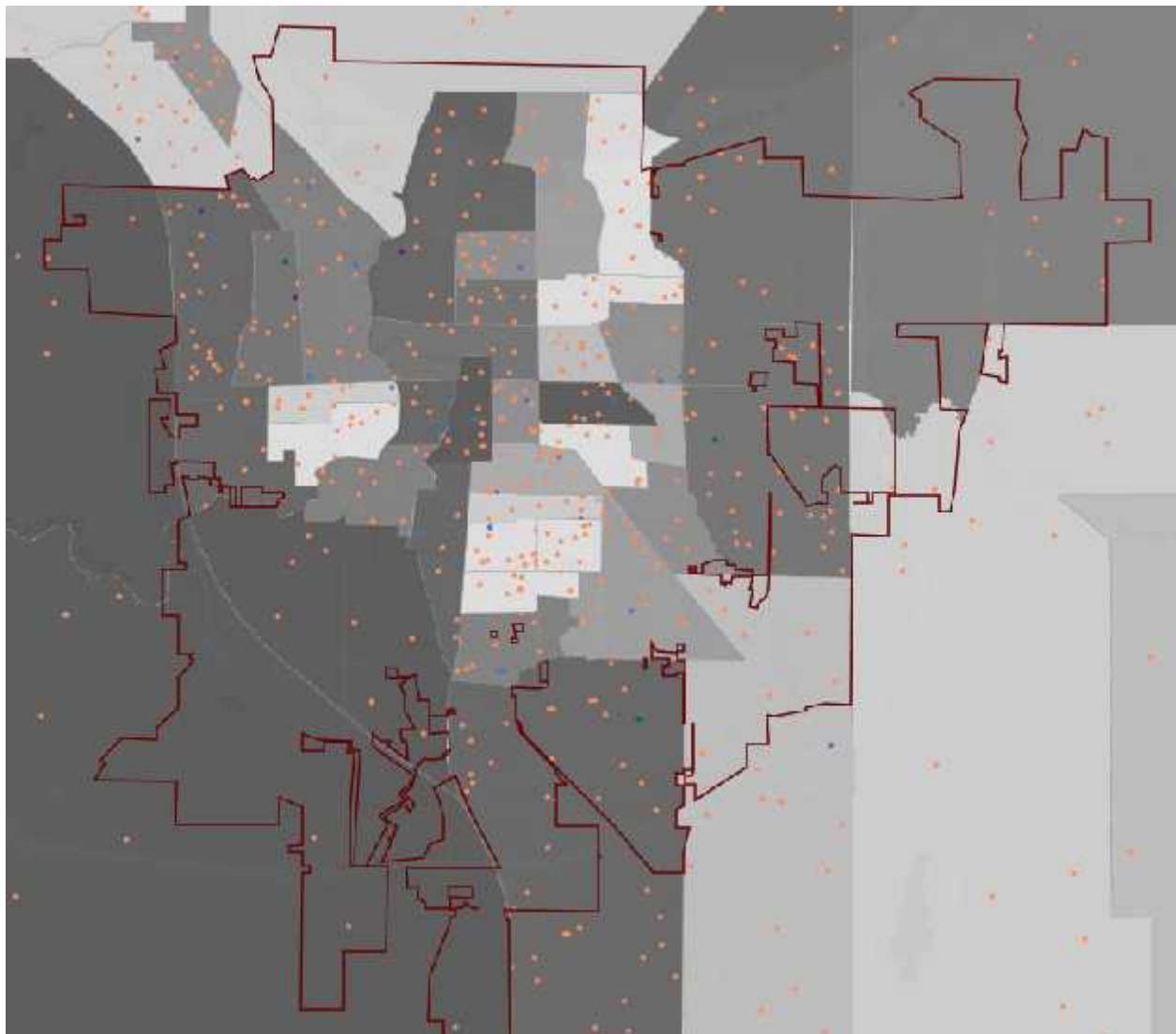
Map 7 School Proficiency



School Proficiency Index



Map 8 Job Proximity



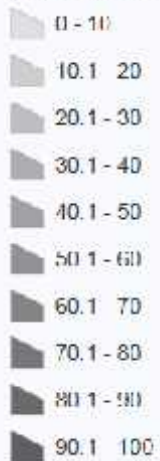
Jobs Proximity Index

0 - 10
10.1 - 20
20.1 - 30
30.1 - 40
40.1 - 50
50.1 - 60
60.1 - 70
70.1 - 80
80.1 - 90
90.1 - 100

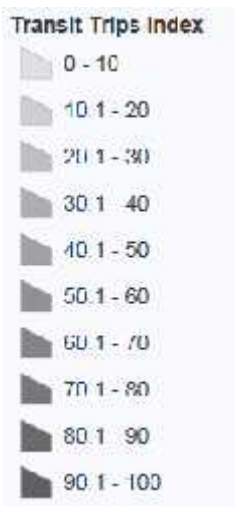
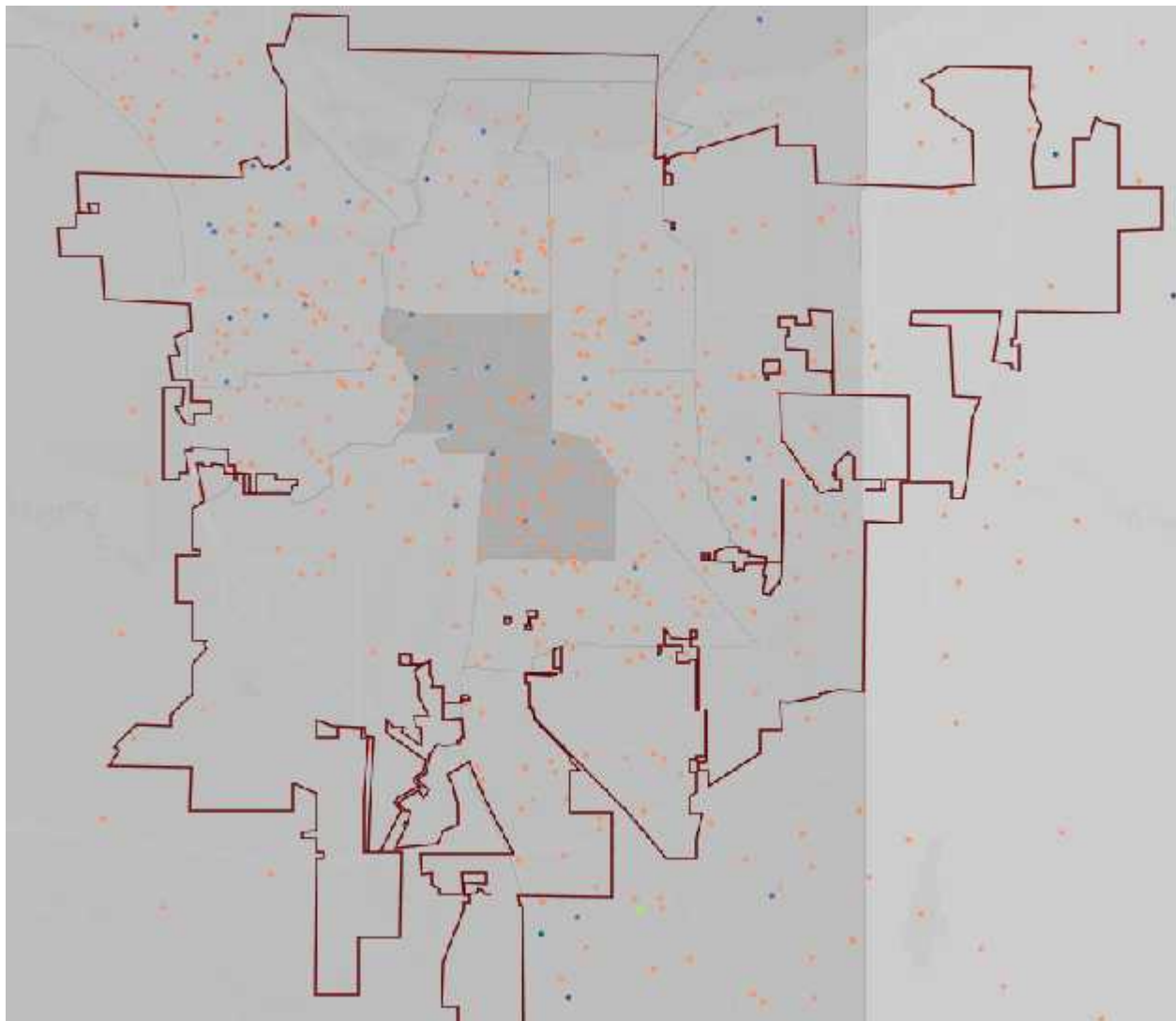
Map 9 Labor Markets and Race and Ethnicity



Labor Market Index



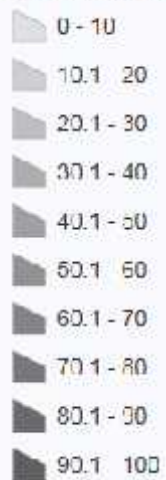
Map 10 Transit Trips



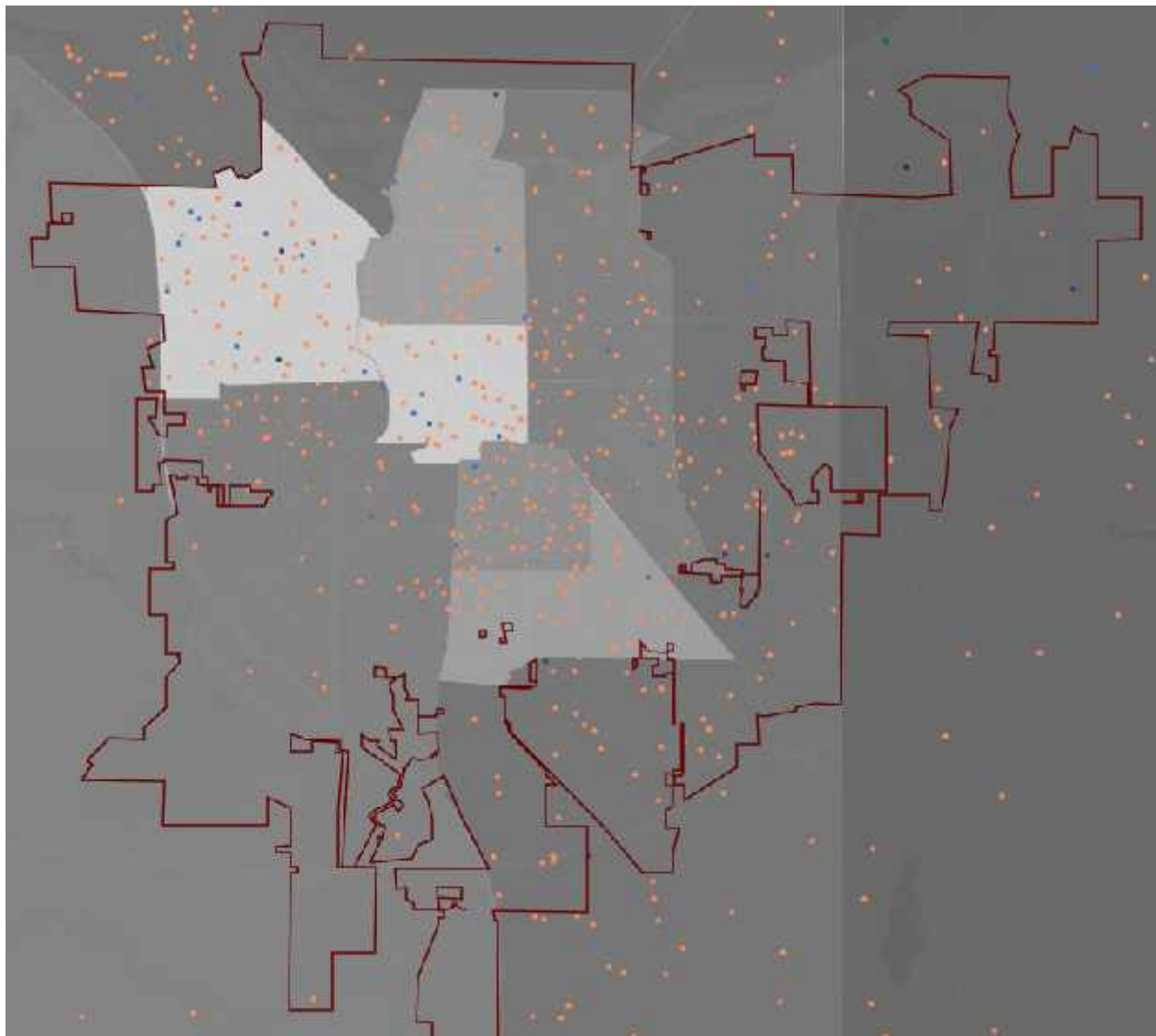
Map 11 Low Transportation Cost



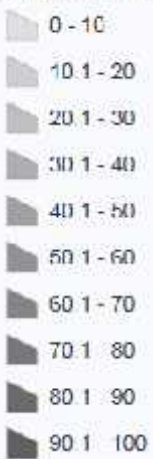
Low Transportation Cost Index



Map 12 Low Poverty



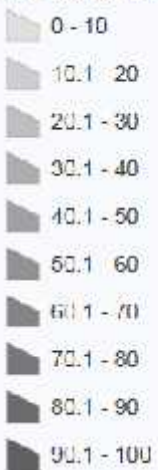
Low Poverty Index



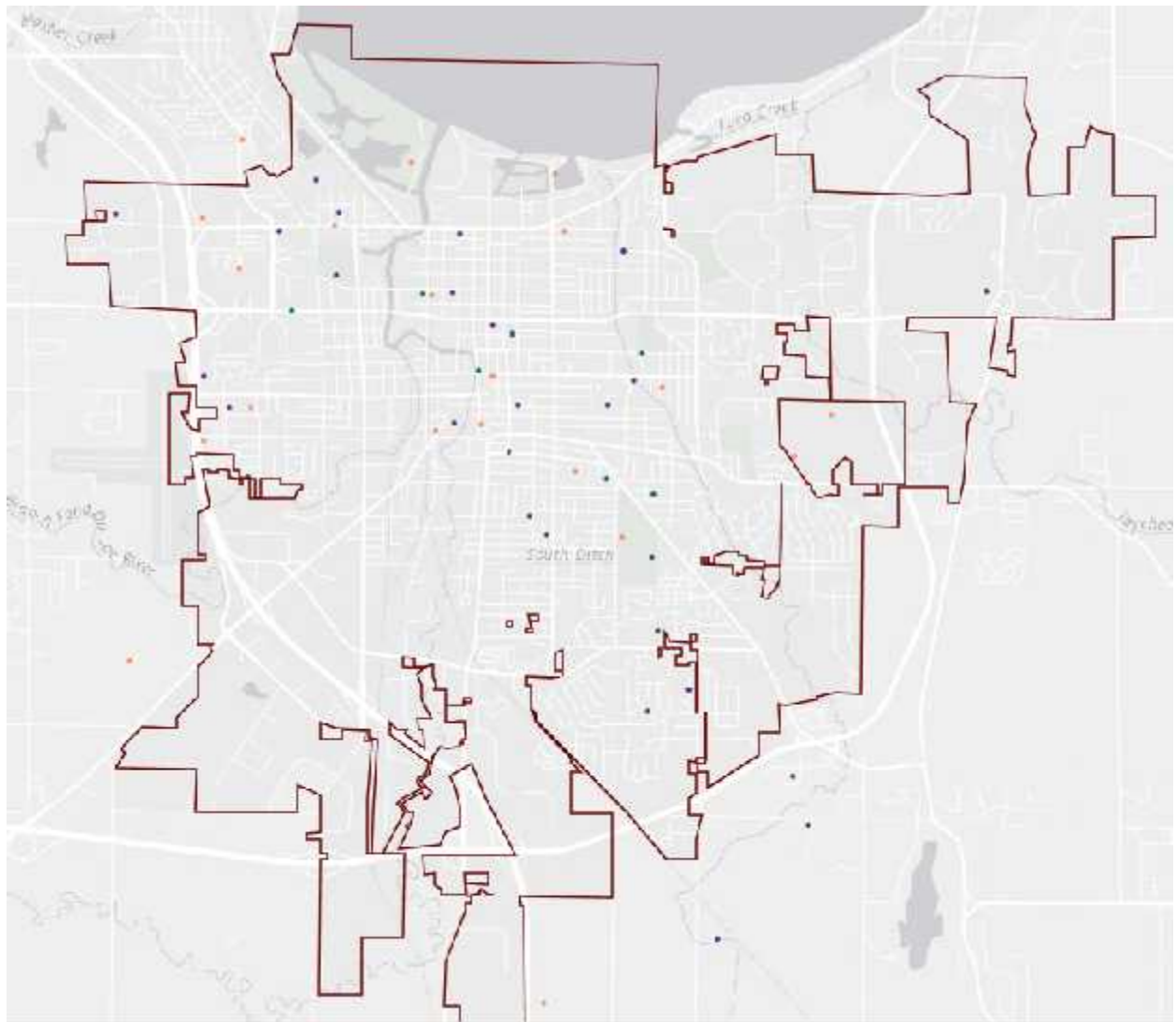
Map 13 Environmental Health



Environmental Health Index



Map 14a Disability by Type



Disability

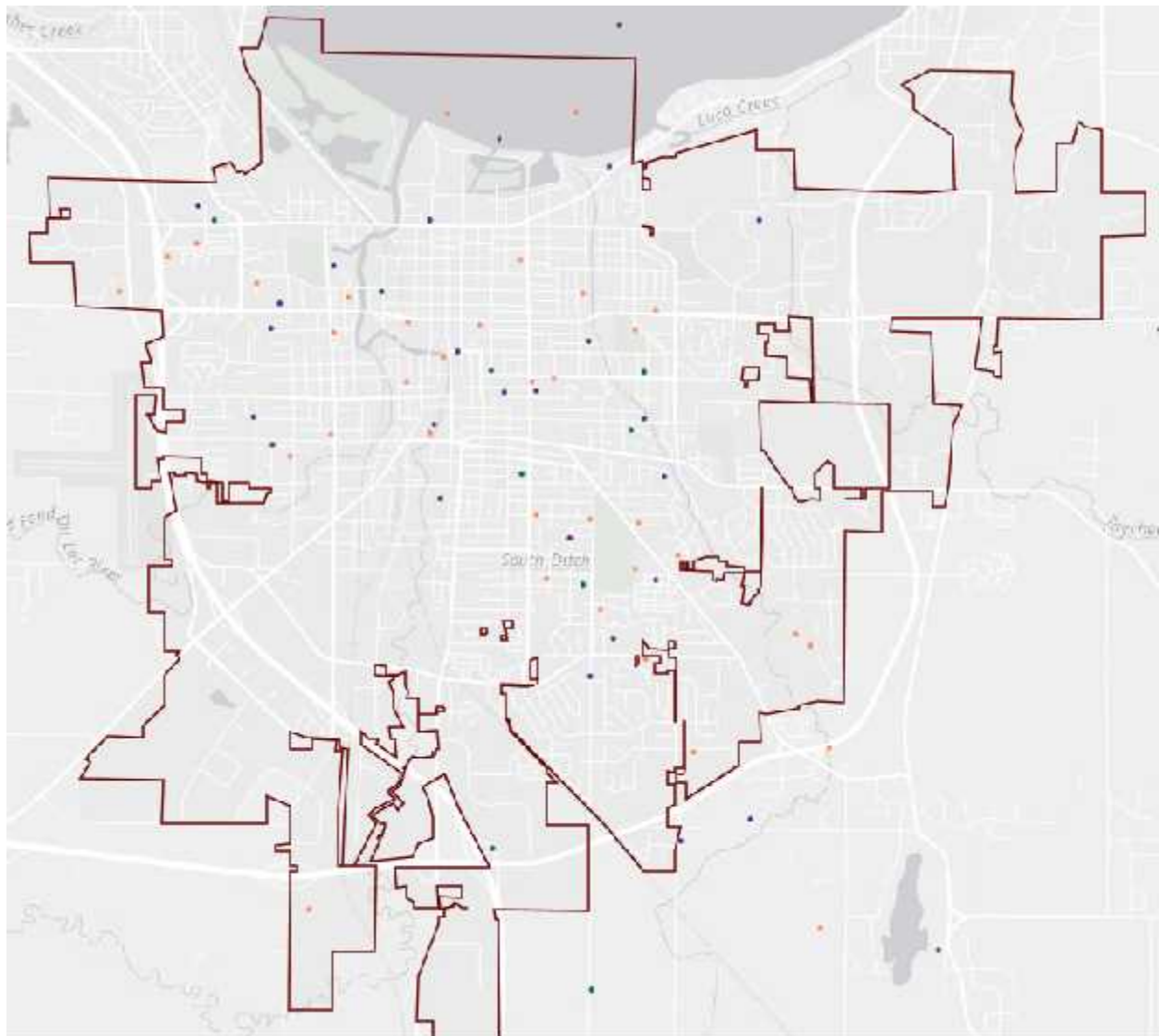
1 Dot = 75

 Hearing Disability

 Vision Disability




 Cognitive Disability

Map 14b Disability by Type

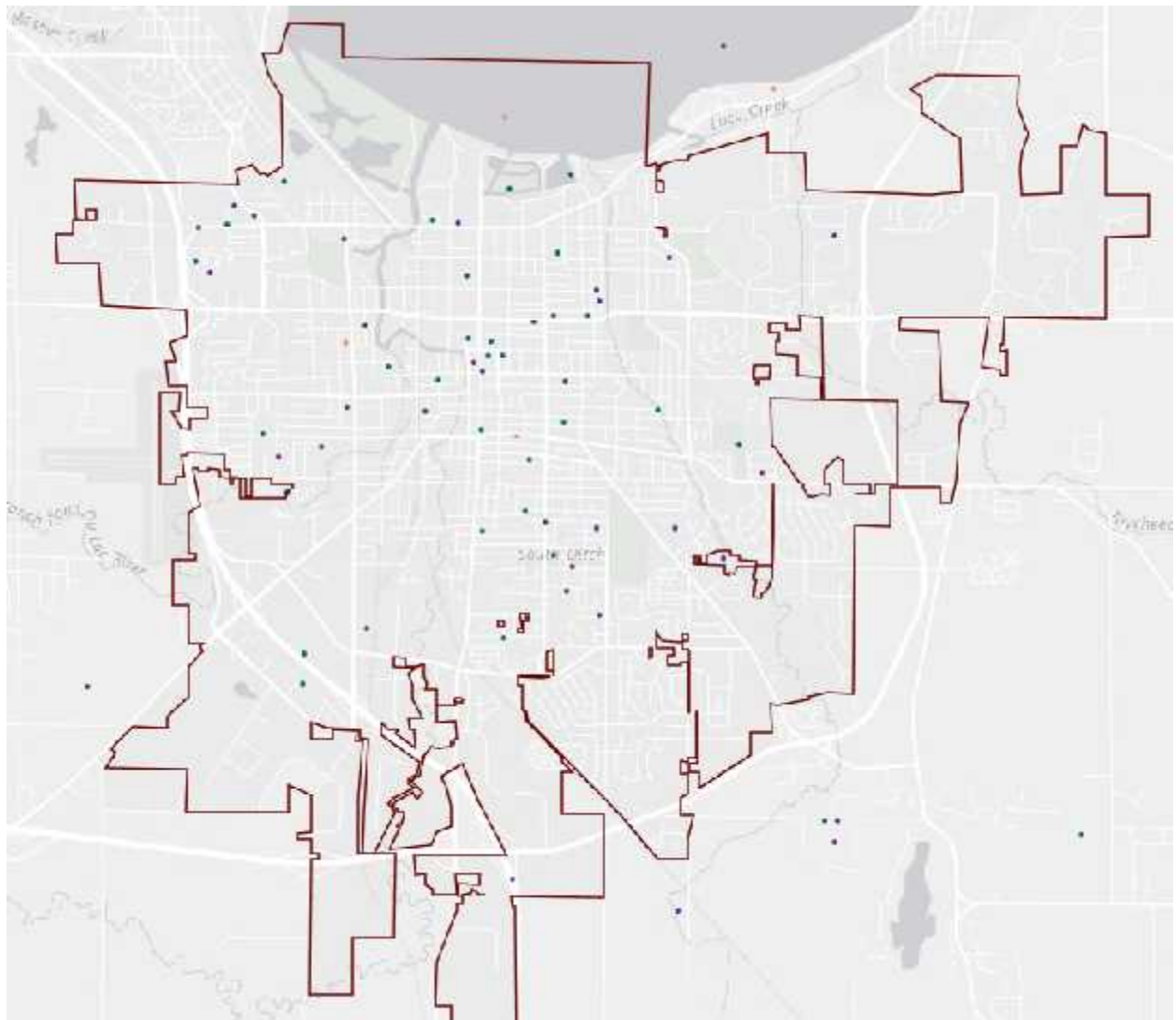


Disability

1 Dot = 75

-  Ambulatory Disability
-  Self-Care Disability
-  Independent Living Disability

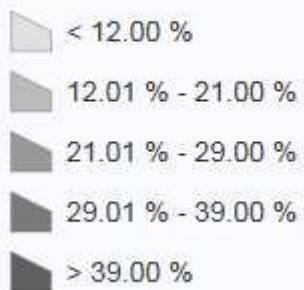
Map 15 Disability by Age Group



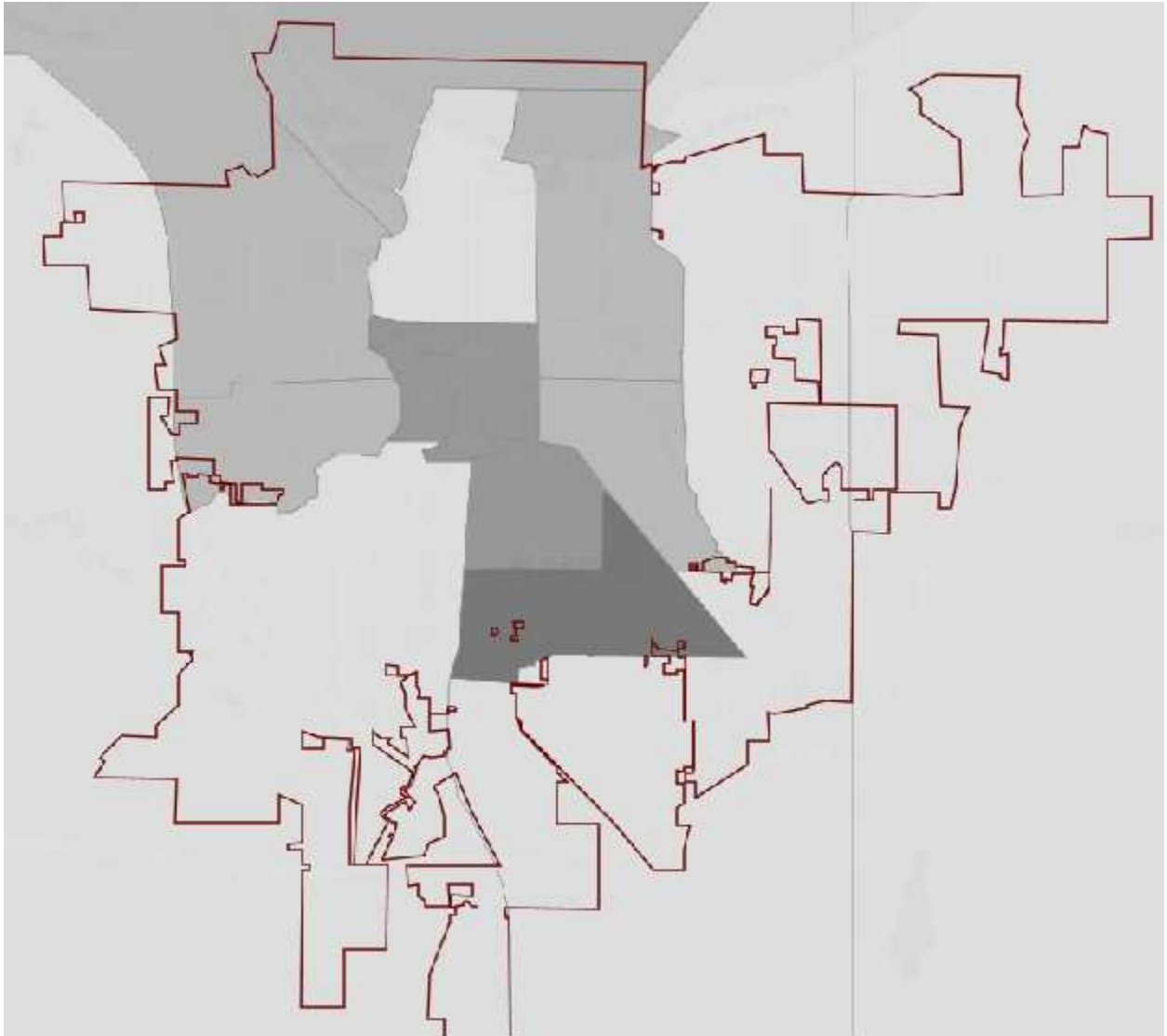
Map 16 Tenure: Renters



Percent Households who are Renters



Map 17: Affordable Rental Units



Appendix C: STAKEHOLDER COMMENTS

The following are **barriers** identified by stakeholders during the Community Engagement Process:

-] Rapid rehousing is an ineffective band-aid. Doesn't solve real issues. Need more PSH (permanent supportive housing).
-] HUD's definition of homelessness is a barrier.
-] Limited transit options are a barrier. However new lines that run every half hour will be an improvement. New Uber alternative may help, but this requires a smart phone (government phones don't have smart phone capabilities). Transit should always overlap with publicly supported housing.
-] Limited childcare options are barriers. Fond du Lac child care centers do not operate for all the hours that many low income families may need, like third shift and weekends.
-] Housing provider screening standards can be an impediment. For instance some housing providers' requirement of tenants' needing to have income three times the amount of rent can be an impediment to many low income renters.
-] Many housing providers will not rent to homeless kids turning 18.
-] Limited transit. Busses stop at 6 pm.
-] "211" is a barrier. There is no obvious "front door" for persons to get into the system; or the systems entry is just not communicated effectively.
-] Need for greater involvement from the black community.
-] Income disparity by race is a problem.
-] Transit options are limited; transit is also underutilized by many.
-] Many English Language Learners (ELL) have a fear of law enforcement.
-] Prevalence of narrow-mindedness in Fond du Lac, fear of "other" kinds of people, races, and persons not from Fond du Lac. Juxtaposition with growth in persons of color with increased knowledge (social media, immediate news notifications) about crime makes many think crime is linked to people of color; when in fact crime is down; people are just more aware of it.
-] Transit is underutilized, perhaps a stigma.
-] Lack of housing stability - 520 evictions annually in Fond du Lac County; about 10 per week. Fond du Lac Housing Authority waiting period to receive housing assistance is about 2 years.
-] About 50% of 211 (a community service help line) calls are for rent assistance.
-] 211 has great potential, but needs more exposure.
-] No housing options for persons reentering the community from prison.
-] Transit/ transportation options limited. The low income residents of public housing cannot afford taxis. More busses are needed on Saturdays. Persons in wheelchairs have difficulty using busses in winter due to snow on sidewalks and curb cuts.
-] Accessibility issues: curb cuts are too steep in many intersections; many public entrances not accessible (Younkers); stores don't have enough motorized carts for persons with disabilities.

-] North Fond du Lac has a concentration of Latinos. There are 85 ELL in the North Fond du Lac school district. Flood Mobile Home Community in North Fond du Lac will accept ITINs (Individual Taxpayer Identification Number) instead of social security numbers (ITINs are issued by the IRS. It allows a person to work and pay taxes, but no other benefits). One benefit of the ITIN is it allows a person to establish a record of good intentions. Marine credit union will allow an ITIN for mortgage loans.
-] Undocumented residents cannot obtain a driver's license.
-] High rate of suspension for black males in the Fond du Lac School District. District has created a District Equity Team to address this. School district staff lacks diversity. North Fond du Lac does a bit better, more investment in staff diversity.
-] A person's legal status is a big barrier. It affects a person's ability to be employed and get a driver's license.
-] Language barriers exist. Suggestion of making services more accessible to non-English speaking persons in the same way accessibility is advertised for persons with disabilities. Language barriers between schools and parents...how are the schools engaging the non-English speaking parents?
-] Persons of color have a general feeling of not being welcome in Fond du Lac by landlords, police, and staff in businesses. Anecdote that after blacks move into Fond du Lac the police come to their home to introduce themselves.
-] Considerable transiency in Fond du Lac. Instability in housing is causing families to make a lot of moves.
-] Security deposit costs are a barrier. Many families cannot come up with these funds. Do Advocap and Forward Services provide security deposit assistance?
-] Criminal backgrounds are also a barrier to accessing housing.
-] Large families (4 or more kids) have the most difficult time accessing stable and affordable housing.
-] Single men also have challenges due to gaps in services.
-] 90 days is the maximum amount of time the Solutions Center can shelter their clients.
-] Major challenges to getting people into stable affordable housing include: criminal backgrounds, evictions, income too low, substance abuse, no driver's license, no social security cards or birth certificates.
-] Limitations to the transit system include limited hours of service.
-] NIMBYism (Not In My Back Yard) becomes apparent in attempts to secure sites for the winter warming shelters or other shelters.
-] Stigma of mental illness. Prevents people from seeking help and others from understanding mental illness.
-] Ability to access mental health services. People have to wait months to see a psychiatrist in Fond du Lac. If their illness is not stable, it is harder to access housing.
-] Location of housing is limited to areas with bus service for those with no car. Most persons working with NAMI do not own a car and live downtown for proximity to mental health services, transit and affordable rents.
-] Criminal background prior to receiving treatment for mental illness.
-] Accessibility is always the biggest problem. Fond du Lac has older housing stock. Accessibility is in top 5 reasons for calls to Options for Independent Living.

- J Transit and infrastructure - sidewalks, curb cuts, transit not dropping off at accessible sites.

The following are stakeholder comments identified during the Community Engagement Process that are not barriers:

When asked about perceived reasons for Fond du Lac's increase in racial and ethnic diversity over last 2 decades...many families are moving from Milwaukee and Chicago, looking for a safer place to raise their families.

In the past, NIMBYism (Not In My Back Yard) has been encountered after a Low Income Housing Tax Credit (LIHTC) project was complete, too late for opposition within the development process. There is racialized fear from a portion of the community that believes that a local developer is advertising in Milwaukee's inner city to convince residents to move to Fond du Lac.

City of Fond du Lac has been a supportive partner in development projects.

When asked how a local developer selects their projects (as they are concentrated in a few census tracts)...locations of projects are driven by Wisconsin Housing and Economic Development Authority (WHEDA) criteria.

When asked about perceived reasons for Fond du Lac's increase in racial and ethnic diversity over last 2 decades...many families are moving from Milwaukee and Chicago, looking for a safer place to raise their families.

Resources are available for persons with disabilities. Mental health services, however, don't meet the need yet.

Good partnership with police. Police participate in the Crisis Intervention Training (CIT).

Many persons with disabilities in single families (disabilities happen after moved in home).

Fond du Lac has been forward thinking on issues around disabilities and preventing persons with disabilities from being institutionalized. Community options program – Fond du Lac piloted this in the 80s. Family Care – Fond du Lac County was early to adopt family care. Allows people to live in their own home.

Moraine Park Technical College (MPTC) initiatives have been very forward thinking; there is a student services office for persons with disabilities.

The following are Stakeholder Recommendations identified during the Community Engagement Process:

Promote Universal Design in new residential construction and rehab; more landlord outreach/education regarding reasonable accommodations modifications.

Basics of infrastructure – looking at funding opportunities (requirement that any public funds put into housing have accessibility requirements).

Fond du Lac could use more organized advocacy by persons with disabilities.

Appendix D: Fond du Lac Lending Analysis

Lender Market Share

The Lender Market Share table lists the mortgage and refinance lenders in the city of Fond du Lac in order by the number of loans made. For instance, this table shows that US Bank made 222, or 10.54% of, mortgage and refinance loans in the city in 2015.

Additionally, the table's third column, "type", indicates whether the loans are prime or subprime.²⁹ According to this list, Marine Credit Union has the 6th greatest market share of mortgage and refinance loans. Marine Credit Union is also the largest subprime lender in Fond du Lac.

Rank Lenders by LMI (Borrower or Tract) Frequency

The Rank Lenders by LMI Frequency table ranks lenders based upon the amount of mortgage and refinance loans made to low and moderate income (LMI) borrowers and/or in LMI census tracts in 2015. Marine Credit Union has made the most loans to LMI borrowers and in LMI census tracts. It is notable that the Marine Credit is the only subprime lender and does the most lending to LMI borrowers and in LMI tracts.

Lender's HMDA Overview

As its name suggests this table is an overview of multiple lending issues. One component of the table breaks down all of the mortgage and refinance loan applications, as reported under the Home Mortgage Disclosure Act (HMDA) made by the race, ethnicity, and gender of the borrower. Just under 83% of the applicants identified as white. The table tallies what the results of each of the loan applications were. For instance, 1,463 of the 2,337 applicants were successfully loaned money (originated) and 413 of the 2,337 applicants were denied the loan. Other applications were withdrawn, incomplete or purchased.

²⁹ More often, subprime mortgage loans are adjustable rate mortgages (ARMs). A subprime mortgage is generally a loan that is meant to be offered to prospective borrowers with impaired credit records. The higher interest rate is intended to compensate the lender for accepting the greater risk in lending to such borrowers.

Year: 2015
 Lender(s): All Lenders
 Geography: Fond du Lac city (WI)
 Loan Amount: Conforming, Jumbo
 Tract Income: All
 Tract % Minority: All
 Hispanic Ethnicity: All
 Property Type: All
 Preapproval Requested?: Yes, No, Unk/NA
 HOEPA Loan?: Yes, No
 Lien Status: All
 Spread Reported?: Yes, No

Action	Loan Type	Purpose	Occupancy	Investor	Race	Income	Sex
All	All	Purchase Refinance	All	All	All	All	All

Rank	Lender	Type	#	%
1	U 3 BK NA (9,0000504713)	P	222	10.54
2	NATIONAL EXCHANGE B&T (1,0000013879)	P	187	8.88
3	AMERICAN BK (3,000019838)	P	159	8.02
4	ASSOCIATED BK NA (9,0000917742)	P	184	7.78
5	FOX VALLEY SVG BK (1,0000703069)	P	146	6.93
6	MARNE CU (3,000066752)	S	126	5.98
7	CITIZENS FIRST CU (3,0000066777)	P	113	5.36
8	BMO HARRIS BK NA (9,0000073633)	P	93	4.41
9	WELLS FARGO BK NA (5,0000451965)	P	75	3.56
10	HOMETOWN BK (3,000012781)	P	53	2.52
11	FOND DU LAC CU (3,000006776)	P	49	2.33
12	QUICKEN LOANS, INC. (7,719700003)	P	46	2.18
13	BANK OF OAKFIELD (2,0000807348)	P	27	1.76
14	LOAN DEPOT.COM (7,26-4599244)	P	20	1.42
15	FREEDOM MORTGAGE CORPORATION (7,25-3739688)	P	29	1.38
15	HCRICOR BK (3,0000011236)	P	29	1.38
17	JPMORGAN CHASE BK NA (9,0000852218)	P	28	1.33
17	CONSUMER LOAN SERVICES (7,27-3121461)	P	28	1.33
19	PEOPLES HOME EQUITY (7,63-859487)	P	26	1.23
20	TOWNE MORTGAGE COMPANY (7,38-2437249)	P	25	1.19
21	FENNYMAC LOAN SERVICES LLC (7,26-2640351)	P	24	1.14
22	DITECH FINANCIAL LLC (7,41-795868)	P	23	1.09
23	NATIONSTAR MORTGAGE LLC (7,75-2921540)	P	22	1.04
23	COMMUNITY FIRST CU (3,0000366642)	P	22	1.04
25	EMBRACE HOME LOANS, INC. (7,05-0402738)	P	17	0.81
25	WATERSTONE MORTGAGE CORP. (3,39-2001010)	P	17	0.81
27	SUN WEST MORTGAGE COMPANY, INC. (7,6443839993)	P	15	0.71
28	FRANKLIN AMERICAN MORTGAGE CO (7,63-1522540)	P	12	0.57
29	PARAMOUNT EQUITY MORTGAGE INC. (7,47-0912342)	P	9	0.43
29	NEWDAY FINANCIAL, LLC (7,22-3887207)	P	9	0.43
31	EVERBANK (5,0002735146)	P	8	0.38
31	STONEGATE MORTGAGE LLC (7,34-1194808)	P	8	0.38
31	CHOICE BK (3,0000058244)	P	8	0.38

S = Subprime, M = Manufactured Home, P = Prime (based on an analysis of lender activity)
 Data used in this analysis are taken from the 2015 National MMDA-LLR published by the Federal Financial Institutions Examination Council.
 Applications with invalid actions were ignored when calculating percentages.

Rank	Lender	Type	#	%
31	BANK OF AMERICA (9,0000480228)	P	8	0.38
35	PLAZA HOME MORTGAGE, INC. (7,33-0941669)	P	7	0.33
35	FLAGSTAR BK FSB (1,0000708412)	P	7	0.33
35	CITIMORTGAGE, INC. (9,13-3222578)	P	7	0.33
38	BANK MUT (1,0000717079)	P	6	0.28
38	BANK OF ENGLAND (3,0000013303)	P	6	0.28
38	MORTGAGE RESEARCH CENTER, LLC (7,43-1965151)	P	6	0.28
38	WISCONSIN MORTGAGE CORPORATION (7,39-1460253)	P	6	0.28
42	AMERICAN LENDING SOLUTIONS, LL (7,39-1954163)	P	5	0.24
42	BADGERLAND FINANCIAL (7,39-0838592)	P	5	0.24
42	CITIBANK NA (9,0000476810)	P	5	0.24
42	ALLIANCE FINANCIAL RESOURCES (7,02-0793125)	P	5	0.24
42	FINANCE OF AMERICA MORTGAGE (7,23-2769131)	P	5	0.24
42	COMMERCE ST BK (3,0000058020)	P	5	0.24
48	FIRST GUARANTY MORTGAGE CORP (7,7516830003)	P	4	0.19
48	VILLAGE CAPITAL & INVESTMENT (7,20-0192872)	P	4	0.19
48	WEST POINTE BK (3,0000034162)	P	4	0.19
48	LANDMARK CU (3,0000036751)	P	4	0.19
48	ANCHORBANK FSB (1,0000704474)	P	4	0.19
53	DUBUQUE B&TC (3,0000315219)	P	3	0.14
53	PROSPECT MORTGAGE, LLC (7,95-4623407)	P	3	0.14
53	INLANTA MORTGAGE (7,39-1767726)	P	3	0.14
53	SUMMIT CU (3,0000067190)	P	3	0.14
53	PACIFIC UNION FINANCIAL LLC (7,75-3170028)	P	3	0.14
53	GUARANTEED RATE INC. (7,36-4327855)	P	3	0.14
53	BANK FIRST NAT (1,0000004975)	P	3	0.14
53	KOHLER CU (3,0000066872)	P	3	0.14
53	FAIRWAY INDP MORTGAGE CORP (7,76-0503625)	P	3	0.14
53	UNIVERSITY OF WI CU (3,0000066492)	P	3	0.14
63	360 MORTGAGE GROUP LLC (7,13-4362989)	P	2	0.09
63	LSI MORTGAGE PLUS (7,58-2546090)	P	2	0.09
63	CRESCENT MTG CO (3,16-1686740)	P	2	0.09
63	AMERICAN ADVISORS GROUP (7,20-1832276)	S	2	0.09

S = Subprime, M = Manufactured Home, P = Prime (based on an analysis of lender activity)

Data used in this analysis are taken from the 2015 National HMDA-LAR published by the Federal Financial Institutions Examination Council.

Applications with invalid actions were ignored when calculating percentages.

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Page 2 of 5

Rank	Lender	Type	#	%
63	PYRAMAX BK FSB (1,0000717954)	P	2	0.09
63	AMERICAN EQUITY MORTGAGE (7,7756300009)	P	2	0.09
63	AMERICAN FINANCIAL RESOURCES (7,22-3554558)	P	2	0.09
63	AGSTAR FINANCIAL SERVICES, ACA (7,41-1956286)	P	2	0.09
63	MB FNCL BK NA (9,0000636733)	P	2	0.09
63	TOTAL MORTGAGE SERVICES, LLC (7,06-1484285)	P	2	0.09
63	FIRST NB OF BERLIN (1,0000004620)	P	2	0.09
63	PEOPLES BK (2,0000177957)	P	2	0.09
63	SIERRA PACIFIC MORTGAGE (7,7056000000)	P	2	0.09
63	AMERISAVE MORTGAGE CORPORATION (7,26-0021318)	P	2	0.09
63	NETWORK CAPITAL FUNDING GROUP (7,47-0873092)	P	2	0.09
63	METROPOLITAN HOME MORTGAGE (7,1227300009)	P	2	0.09
63	1ST ALLIANCE LENDING, LLC (7,20-2053401)	S	2	0.09
63	STEARNS LENDING, INC. (7,7505400005)	P	2	0.09
63	CHERRY CREEK MORTGAGE CO., INC (7,84-1040263)	P	2	0.09
63	COVANTAGE CU (5,0000066848)	P	2	0.09
63	CARRINGTON MORTGAGE SVCS, LLC (7,20-8745846)	P	2	0.09
84	B2R FINANCE L.P. (7,35-2486440)	P	1	0.05
84	CALIBER HOME LOANS, INC. (7,13-6131491)	P	1	0.05
84	AMERIHOM MORTGAGE CORPORATION (7,38-2799035)	P	1	0.05
84	FOX CMNTY CU (5,0000066731)	P	1	0.05
84	MORTGAGE SOLUTIONS OF COLORADO (7,84-1564935)	P	1	0.05
84	ACCUNET MORTGAGE, LLC (7,39-1968140)	P	1	0.05
84	FIRST TECH FCU (5,0000019976)	P	1	0.05
84	FEDERAL SVGS BK (1,0000716195)	P	1	0.05
84	FARMERS BANK & TRUST (3,0000017614)	P	1	0.05
84	MIDFIRST BK (1,0000714191)	P	1	0.05
84	CAMBRIA FINANCIAL GROUP, LLC (7,26-2926983)	P	1	0.05
84	CAPITAL CU (5,0000066865)	P	1	0.05
84	CITIZENS CMNTY FED NA (1,0000025088)	P	1	0.05
84	FIRSTMERIT BK NA (9,0000067311)	P	1	0.05
84	CITIZENS BK (3,0000013055)	P	1	0.05
84	LAKEVIEW LOAN SERVICING, LLC (7,27-4023565)	P	1	0.05

Rank	Lender	Type	#	%
84	NAVY FCU (9,0000617677)	P	1	0.05
84	FIRST NB HARTFORD (1,0000008671)	P	1	0.05
84	BROKER SOLUTIONS, INC (7,01-0725495)	P	1	0.05
84	COLLINS ST BK (3,0000014914)	P	1	0.05
84	NATIONAL ASSET MORTGAGE, LLC (7,45-3062201)	S	1	0.05
84	PLANET HOME LENDING, LLC (7,26-0362771)	P	1	0.05
84	NEWCASTLE HOME LOANS LLC/ISAOA (7,30-0051894)	P	1	0.05
84	INLAND B&T (3,0000022444)	P	1	0.05
84	WATERSTONE BK (3,0000028513)	P	1	0.05
84	FARMERS & MCH UNION BK (3,0000014445)	P	1	0.05
84	JOHNSON BK (2,0000058243)	P	1	0.05
84	21ST MORTGAGE CORP. (7,7162800002)	M	1	0.05
84	CAPITAL ONE NA (9,0000112837)	P	1	0.05
84	TCF NB (9,0000266271)	P	1	0.05
84	NETWORK FUNDING, L.P. (7,76-0561995)	P	1	0.05
84	NORTH SHORE BK FSB (1,0000702130)	P	1	0.05
84	UNITED SECURITY FINANCIAL (7,7272800006)	P	1	0.05
84	MCGLONE MORTGAGE COMPANY, INC (7,39-1981638)	P	1	0.05
84	OCEANSIDE MORTGAGE COMPANY (7,22-3470404)	P	1	0.05
84	PULASKI BK (1,0000705136)	P	1	0.05
84	WINNEBAGO CMNTY CU (5,0000066437)	P	1	0.05
84	HOMEBRIDGE FINANCIAL SERVICES (7,7811300008)	P	1	0.05
84	HOMEWARD RESIDENTIAL, INC (7,42-1739728)	P	1	0.05
84	TRUHOME SOLUTIONS, LLC (5,76-0762186)	P	1	0.05
84	DENMARK ST BK (3,0000013240)	P	1	0.05
84	AMERIFIRST FINANCIAL CORP (7,38-2699549)	P	1	0.05
84	ROYAL UNITED MORTGAGE LLC (7,26-1773722)	P	1	0.05
84	GLACIER HILLS CU (3,0000067238)	P	1	0.05
84	NATIONWIDE BK (1,0000714970)	P	1	0.05
84	WESTBURY BK (1,0000717893)	P	1	0.05
84	BANC OF CANA (1,0000025080)	P	1	0.05
84	FIFTH THIRD MTG CO (9,31-1197926)	P	1	0.05
84	HIAWATHA NB (1,0000015698)	P	1	0.05

Rank	Lender	Type	#	%
84	APPLETREE CU (5,0000066675)	P	1	0.05
84	PORT WASHINGTON ST BK (3,0000008698)	P	1	0.05
84	USAA FSB (9,0000619877)	P	1	0.05
84	MANUFACTURERS & TRADERS TC (9,0000501105)	P	1	0.05
84	TRI CITY NB (1,0000013738)	P	1	0.05
84	FLAGSHIP FINANCIAL GROUP, LLC (7,87-0630553)	P	1	0.05
84	THOMSON KANE & COMPANY, LLC (7,45-4156623)	P	1	0.05
84	PHH HOME LOANS LLC (7,2317700005)	P	1	0.05
84	THE MONEY SOURCE (7,11-3412303)	P	1	0.05
84	AMERICAN BK (1,0000708149)	P	1	0.05
84	HERITAGE CU (5,0000068385)	P	1	0.05
84	FIRST NB FOX VALLEY (1,0000003724)	P	1	0.05
84	FIRST FED BK OF FL (1,0000706707)	P	1	0.05
84	WISCONSIN BANK & TRUST (3,0000013023)	P	1	0.05
	Number of Lenders = 146	Total	2,107	100.00

Year: 2015

Lender(s): All Lenders

Geography: Ford du Lac City (WI)

Loan Amount: Conforming, Jumbo

Tract Income: Low, Mod

Tract % Minority: All

Hispanic Ethnicity: All

Property Type: All

Preapproval Requested?: Yes, No, Unk/NA

HOLPA Loan?: Yes, No

Lien Status: All

Spread Reported?: Yes, No

Action	Loan Type	Purpose	Occupancy	Investor	Rate	Income	Sex
All	All	All	All	All	All	All	All

Rank	Lenders (see footnote)	Apps	Target	%
1	MARINE CU (5,1101166752)	25	29	100.00
1	US LK NA (5,001114713)	21	21	100.00
1	ASSOCIATED BK NA (9,0000917742)	21	21	100.00
1	NATIONAL EXCHANGE B&T (1,0111113379)	21	20	100.00
1	CITIZENS FIRST CU (5,0000066777)	15	16	100.00
1	AMERICAN BK (3,0000019838)	13	13	100.00
1	BANK OF OAKFIELD (2,0000807348)	9	9	100.00
1	HOMELOWN BK (2,0000012782)	8	8	100.00
1	QUICKEN LOANS, INC. (7,7197000003)	8	8	100.00
1	BMO HARRIS BK NA (2,0000075613)	6	6	100.00
1	FREEDOM MORTGAGE CORPORATION (7,33 3039688)	5	5	100.00
1	FLEX VALLEY STATE BK (1,0000703069)	5	5	100.00
1	FORD DU LAC CU (5,0000067176)	5	5	100.00
1	CONSUMER LEAN SERVICES (7,27-019,461)	5	5	100.00
1	PEOPLES HOME EQUITY (7,12-1855487)	4	4	100.00
1	CITIBANK CHASE BK NA (2,000052215)	4	4	100.00
1	WEST FOINTE BK (3,1101134122)	4	4	100.00
1	SOUTH CENT BK NA (1,0000024430)	3	3	100.00
1	PLAZA HOME MORTGAGE, INC. (7,33-0941669)	3	3	100.00
1	PENNYMAC MORTGAGE SERVICES LLC (7,75-2049341)	3	3	100.00
1	NATIONSTAR MORTGAGE LLC (7,73-3521541)	3	3	100.00
1	HOME LOAN INV BK FSB (1,1101713504)	3	3	100.00
1	SUN WEST MORTGAGE COMPANY, INC (7,6443819952)	3	3	100.00
1	WELLS FARGO BK NA (2,0000451965)	3	3	100.00
1	ALLIANCE FINANCIAL SERVICES (7,02-1751125)	3	3	100.00
1	LOANDEPOT.COM (7,26 4559211)	3	2	100.00
1	CITICORP BK (2,001113244)	2	2	100.00
1	WATERSTONE MORTGAGE CORP. (3,39 2001010)	2	2	100.00
1	AMERICAN LENDING SOLUTIONS, LL (7,33-1964163)	2	2	100.00
1	PARAMOUNT EQUITY MORTGAGE INC. (7,17 1913343)	2	2	100.00
1	COMMERCE BK (3,0000038020)	2	2	100.00
1	HORICON BK (3,0000011332)	2	2	100.00
1	CUYANABANK (2,1101066848)	2	2	100.00

Rank	Lenders (see footnote)	Apps	Target	%	
1	EVERBANK (9,0002735146)	2	2	100.00	
1	FLAGSTAR BK FSB (1,0000708412)	2	2	100.00	
1	COMMUNITY FIRST CU (5,000066642)	2	2	100.00	
1	EMBRACE HOME LOANS, INC. (7,05-0402708)	2	2	100.00	
1	STONEGATE MORTGAGE LLC (7,34-1194858)	1	1	100.00	
1	NORTH SHORE BK FSB (1,0000702130)	1	1	100.00	
1	THE MONEY SOURCE (7,11 3412303)	1	1	100.00	
1	PYRAMAX BK FSB (1,0000717954)	1	1	100.00	
1	WATERS TONE BK (3,0000028513)	1	1	100.00	
1	STATE FARM BK FSB (9,000239037)	1	1	100.00	
1	HIAWATHA NB (1,0000015698)	1	1	100.00	
1	CITIZENS CMNTY FED NA (1,0000025088)	1	1	100.00	
1	CRESCENT MTG CO (3,16-1686740)	1	1	100.00	
1	FARMERS & MRCH UNION BK (3,0000014445)	1	1	100.00	
1	CITIZENS BK (3,0000013055)	1	1	100.00	
1	CHERRY CREEK MORTGAGE CO., INC (7,84-1040263)	1	1	100.00	
1	AMERICAN EQUITY MORTGAGE (7,7756300009)	1	1	100.00	
1	BANK OF AMER NA (2,0000480238)	1	1	100.00	
1	FIRST TECH FCU (5,0000019976)	1	1	100.00	
1	FIRST MERIT BK NA (9,0000067311)	1	1	100.00	
1	METROPOLITAN HOME MORTGAGE (7,1227300009)	1	1	100.00	
1	MORTGAGE RESEARCH CENTER, LLC (7,43-1965151)	1	1	100.00	
1	LANDMARK CU (5,0000066751)	1	1	100.00	
1	KOHLER CU (5,0000066872)	1	1	100.00	
1	FRANKLIN AMERICAN MORTGAGE CO (7,62-1532943)	1	1	100.00	
1	1ST ALLIANCE LENDING, LLC (7,20-2053401)	1	1	100.00	
1	NEWDAY FINANCIAL, LLC (7,22-3887207)	1	1	100.00	
	Number of Lenders = 60	Totals	254	254	100.00

This report shows the lenders with a minimum of 1 applications. Lenders in YELLOW are those whose % is lower than average.
Data used in this analysis are taken from the 2015 National HMDA-LAR published by the Federal Financial Institutions Examination Council.
Lenders are sorted in descending order.

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Year: 2015

Lender(s): All Lenders

Geography: Fond du Lac city (WI)

Loan Amount: Conforming, Jumbo

Tract Income: All

Tract % Minority: All

Hispanic Ethnicity: All

Property Type: All

Preapproval Requested?: Yes, No, Unk, NA

HOEPA Loan?: Yes, No

Loan Status: All

Spread Reported?: Yes, No

Action	Loan Type	Purpose	Occupancy	Investor	Race	Income	Sex
All	All	All	All	All	All	All	All

Race	White	1,930	82.58%
	Black	12	0.51%
	Hispanic	50	2.14%
	Asian	31	1.33%
	Native American	2	0.09%
	Hawaiian	3	0.13%
	MultRace	4	0.17%
	Unk.	138	5.91%
	NA	167	7.15%
	Invalid	0	0.00%
Total		2,337	100.00%

Hispanic Ethnicity	Hispanic	50	2.14%
	Non-Hispanic	1,993	85.28%
	Unk.	127	5.43%
	NA	167	7.15%
	Invalid	0	0.00%
Total		2,337	100.00%

Action	Originated	1,463	62.60%
	Denied	413	17.67%
	Rejected by Applicant	78	3.34%
	Withdrawn	192	8.22%
	Incomplete	55	2.35%
	Purchased	129	5.52%
	Preapproval Denied	2	0.09%
	Preapproval Rejected	5	0.21%
	Invalid	0	0.00%
Total		2,337	100.00%

Loan Type	Conventional	1,862	79.67%
	FHA	354	15.15%
	VA	119	5.09%
	FSA/RHS	2	0.09%
	Invalid	0	0.00%
Total		2,337	100.00%

Investor	Fannie Mae	379	16.22%
	Ginnie Mae	224	9.58%
	Freddie Mac	158	6.76%
	Farmer Mac	0	0.00%
	Non Agency	206	8.81%
	Not Sold	1,370	58.62%
	Invalid	0	0.00%
Total		2,337	100.00%
Amount	Conforming	2,316	99.10%
	Jumbo	21	0.90%
	Invalid	0	0.00%
Total		2,337	100.00%
Average Loan Amount	First Lien (\$000)	126.61	
	Subordinate Lien (\$000)	25.84	
	Other Lien (\$000)	79.24	
Tract Income	Low	0	0.00%
	Moderate	254	10.87%
	Middle	1,702	72.83%
	Upper	381	16.30%
	Unk/NA	0	0.00%
Total		2,337	100.00%
Tract % Minority	<10%	1,863	79.72%
	10-20%	316	13.52%
	20-30%	158	6.76%
	30-40%	0	0.00%
	40-50%	0	0.00%
	50-60%	0	0.00%
	60-70%	0	0.00%
	70-80%	0	0.00%
	80-90%	0	0.00%
	90-100%	0	0.00%
	Unk/NA	0	0.00%
Total		2,337	100.00%

Occupancy	Owner Occupied	2,114	90.46%
	Non-Owner Occupied	212	9.07%
	NA	11	0.47%
	Invalid	0	0.00%
	Total	2,337	100.00%
Purpose	Purchase	985	42.15%
	Home Improvement	230	9.84%
	Refinance	1,122	48.01%
	Invalid	0	0.00%
	Total	2,337	100.00%
Income	Low	271	11.60%
	Moderate	520	22.25%
	Middle	575	24.60%
	Upper	670	28.67%
	Unk/NA	301	12.88%
	Invalid	0	0.00%
	Total	2,337	100.00%
Gender	Male Primary	918	39.28%
	Female Primary	186	7.96%
	Female (no co-app.)	373	16.03%
	Male (no co-app.)	579	24.78%
	Same Gender	26	1.11%
	Unk	86	3.68%
	NA	167	7.15%
	Invalid	0	0.00%
	Total	2,337	100.00%
Gender Rollup	Apps with at least one Male vs. Female(s) with no Male.		
	Male	1,698	72.66%
	Female	389	16.63%
	Other	250	10.70%
	Invalid	0	0.00%
Total	2,337	100.00%	

HOEPA	HOEPA Loans	3	0.13%
	Non-HOEPA Loans	2,334	99.87%
	Invalid	0	0.00%
	Total	2,337	100.00%
Lien Status	First Liens	2,019	86.39%
	Subordinate Liens	100	4.28%
	Not Secured by Lien	89	3.81%
	NA	129	5.52%
	Invalid	0	0.00%
	Total	2,337	100.00%
Property Type	One to Four	2,238	95.76%
	Manufactured	85	3.64%
	Multifamily	14	0.60%
	Invalid	0	0.00%
	Total	2,337	100.00%
PreApproval	PreApproval Requested	129	5.52%
	PreApproval Not Requested	365	15.62%
	NA	1,843	78.86%
	Invalid	0	0.00%
	Total	2,337	100.00%
Spread Reported	Yes	98	6.70%
	No	1,365	93.30%
	Invalid	0	0.00%
	Total Loans	1,463	100.00%
Average Spread Reported	First Lien Spread	3.32	
	Subordinate Lien Spread	5.81	
	Other Lien Spread	0.00	

