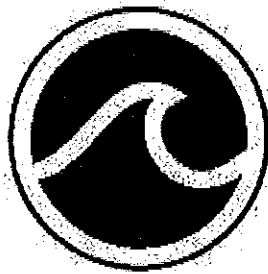


CITY OF OSHKOSH

COMMUNITY DEVELOPMENT BLOCK GRANT

Analysis of Impediments to Fair Housing Choice



OSHKOSH

ON THE WATER

October 25, 2005

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I. INTRODUCTION AND EXECUTIVE SUMMARY OF THE ANALYSIS

INTRODUCTION

The City of Oshkosh has been an entitlement community of the U.S. Department of Housing and Urban Development (HUD) Community Development Block Grant (CDBG) program since 1974. This means that the city receives federal CDBG program funding on a formula basis annually.

HUD requires that entitlement communities prepare a Consolidated Plan every five years. The Plan includes an assessment of community needs and goals for spending CDBG funding to address those needs in the context of CDBG eligible activities. The goals will serve as the criteria against which HUD will evaluate the city's Consolidated Plan and its performance under the Plan.

An annual Action Plan is prepared to show which projects will be funded in a given CDBG Program Year. The Consolidated Annual Performance Evaluation Report (CAPER) provides an annual report on accomplishments and funds expended.

Among other requirements in the CDBG planning and reporting process, the city must address fair housing issues, specifically, impediments to fair housing choice and how those impediments are addressed through the process of affirmatively furthering fair housing.

INTRODUCTION TO FAIR HOUSING ISSUES

HUD defines impediments to fair housing choice as:

- ❖ Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin that restrict housing choices or the availability of housing choice.
- ❖ Any actions, omissions or decision that have this effect.

Policies, practices, or procedures that appear neutral on their face, but which operate to deny or adversely affect the availability of housing to persons because of race, ethnicity, disability status, and families with children may constitute such impediments.

Impediments to fair housing choice include actions or omissions in the city that:

- ❖ Constitute violations, or potential violations of the Fair Housing Act
- ❖ Are counter productive to fair housing choice, such as:
 - Resistance when minorities and/or low-income persons first move into white and/or moderate- to high-income areas.
 - Resistance to the siting of group homes for persons with disabilities because of the persons who will occupy the housing.
- ❖ Have the effect of restricting housing opportunities on the basis of race, color, religion, sex, disability, familial status, or national origin.

A. Responsible Party

The City of Oshkosh Planning Services Division staff prepared this document. City staff collected information from various statistical data sources, including: U.S. Census, Home Mortgage Disclosure Act (HMDA), Wisconsin Department of Administration population estimates, and the East Central Wisconsin Regional Planning Commission.

B. Participants

A copy of the draft Analysis of Impediments (AI) was forwarded to Housing FOCUS Committee in August 2005 and was placed on the September and October agendas for this Committee meeting. Members were encouraged to share comments/observations at these meetings or forward them separately to staff. Agencies represented at these meetings include the Oshkosh Area United Way, Wisconsin Public Service Corporation, UW-Extension, the Winnebago County/Oshkosh Housing Authority, ADVOCAP, and other various service agencies.

C. Methodology Used

This document was prepared based on the suggested format in "Chapter 2-Appendix" of the HUD Fair Housing Planning Guide, Volume 1.

D. How Funded

The Community Development Block Grant program funded all activities undertaken in preparation of this document.

E. Conclusions

1. Impediments Found

The following impediments were found regarding housing choice:

- Lack of understanding of what constitutes a viable fair housing complaint. Some complaints were dismissed for lack of probable cause and some cases may not be reported due to lack of knowledge of viable issues.
- Need for fair housing training for both tenants and landlords.
- Effects of financial decisions regarding credit history, home equity, and other loan information.

2. Actions to Address Impediments

The following actions have been identified to address housing choice impediments:

- Support fair housing and financial educational programming,
- Promote agencies assisting with fair housing activities,
- Provide technical assistance to the Home Buyer program, and
- Continue to fund the owner-occupied rehabilitation program.
- Continue to reinforce fair housing requirements with owners of city funded rental rehabilitation units.

II. Jurisdictional Background Data

The City of Oshkosh is the largest city in Winnebago County and has served as the county seat since 1850. Per the January 2004 population projections, Oshkosh is the eighth largest municipality in the state. It is important to note that the city's population contains a significant number of state prisoners and college students living in dormitories who are not living in conventional housing units.

The State of Wisconsin Department of Administration estimated that the population of Oshkosh was 65,445 on January 1, 2005, an increase of 2,529 persons since the 2000 Census. Of the total population, there were 4,110 institutionalized persons according to the DOA estimate. The city estimates that, in addition, approximately 3,000 students were living on the University of Wisconsin-Oshkosh campus.

Following is a list of highlights comparing 1990 and 2000 Census data for the city:

- ❖ The median age rose from 30.4 years in 1990 to 32.4 years in 2000.
- ❖ In the race category, the minority population (non-white) rose from 1,872 people in 1990 to 3,961 people in 2000. This is due in part to the annexation of the state prison and other state and county institutions and the expansion of the prison following annexation.
- ❖ Owner-occupied units rose slightly from 11,942 units (57%) in 1990 to 13,851 units (57.5%) in 2000.
- ❖ The number of individuals living below poverty level declined from 6,325 persons in 1989 to 5,672 in 1999.
- ❖ The owner-occupied vacancy rate rose slightly from 1.2% in 1990 to 1.3% in 2000.
- ❖ The renter-occupied vacancy rate rose from 4.2% in 1990 to 6.5% in 2000.

A. Demographic Data

Table 1 on the following page shows age and gender characteristics of the Oshkosh population. Over the past twenty years, Oshkosh had a fairly even balance between the male and female populations. The median age has continued to increase since 1980 and, given the current data on the city's aging population, will continue to do so.

Over the recent few decades, the population has for the most part remained constant per age group. In general, there has been an increase in the percentage of the population that is 35 to 54 years old and those over 75 years old. Three age categories have decreased in actual numbers from 1980 to 2000, even though the overall population continued to increase. These three declining categories are in the 55 to 74 year old ranges.

Table 1. Population by Age and Sex	1980 Census		1990 Census		2000 Census	
	Number	Percent	Number	Percent	Number	Percent
Total Population	49,620	100.0%	55,006	100.0%	62,916	100.0%
Male	23,193	46.7%	26,213	47.7%	31,449	50.0%
Female	26,427	53.3%	28,793	52.3%	31,467	50.0%
Under 5 years	2,846	5.7%	3,605	6.6%	3,421	5.4%
5 to 9 years	2,873	5.8%	3,472	6.3%	3,679	5.8%
10 to 14 years	3,166	6.4%	2,770	5.0%	3,746	6.0%
15 to 19 years	5,590	11.3%	4,805	8.7%	5,594	8.9%
20 to 24 years	7,239	14.6%	7,412	13.5%	8,020	12.7%
25 to 34 years	7,761	15.6%	9,475	17.2%	9,341	14.8%
35 to 44 years	4,351	8.8%	7,221	13.1%	9,372	14.9%
45 to 54 years	4,418	8.9%	4,313	7.8%	7,205	11.5%
55 to 59 years	2,324	4.7%	2,087	3.8%	2,316	3.7%
60 to 64 years	2,180	4.4%	2,116	3.8%	1,985	3.2%
65 to 74 years	3,901	7.9%	3,909	7.1%	3,748	6.0%
75 to 84 years	2,971	6.0%	2,933	5.3%	3,045	4.8%
85 years and over			888	1.6%	1,444	2.3%
Median Age (years)	29.6		30.4		32.4	

Source: U.S. Census 1980, 1990, and 2000

Table 2, below, shows an increase in the minority population between 1990 and 2000. It appears that the fastest growing minority population is Hispanic, followed by Asian/Native Hawaiian/Pacific Islander. Between 2000 and 2005, the total population grew by 2,529 persons, an increase of 4 percent. The institutional population grew by 420 or 11.4 percent during this time period while the non-institutional population grew by 2,109 or 3.3 percent.

It should also be noted that the city suspects an undercount of Asian and Pacific Islanders in both the 1990 and 2000 Census.

Table 2. Population by Race and Hispanic Origin	1990 Census		2000 Census	
Total Population	55,006	100%	62,916	100%
White	53,134	96.6%	58,339	92.7%
Black	347	0.6%	1,376	2.2%
American Indian and Alaska Native	316	0.6%	326	0.5%
Asian/Native Hawaiian/Pacific Islander	1,039	1.9%	1,925	3.1%
Other Race	170	0.3%	334	0.5%
Two or More Races	Data Not Reported in 1990 Census		616	1.0%
Hispanic or Latino (of any race)	489	0.8%	1,062	1.7%

Source: U.S. Census 1990, and 2000

B. Income Data

The table below shows the dispersion of income for households in the city. The 1989 and 1999 income levels were reported in the 1990 and 2000 Census, respectively. With the rate of inflation over the 10-year period, it is expected that median household income would rise.

From 1989 to 1999, household income in Oshkosh grew faster than the rate of inflation. With the rates of inflation, \$1.00 in 1989 had the same buying power as \$1.34 in 1999. This means that the median 1989

household income of \$25,168 had the same buying power of \$33,725 in 1999. However, the 1999 median household income was actually \$37,636, exceeding inflation.

Table 3. Household Income	1989 (1990 Census)		1999 (2000 Census)	
	Number	Percent	Number	Percent
Less than \$10,000	3,372	16.0%	1,869	7.8%
\$10,000-14,999	2,387	11.3%	1,594	6.6%
\$15,000 to \$24,999	4,690	22.2%	4,003	16.7%
\$25,000 to \$34,999	4,201	20.0%	3,696	15.4%
\$35,000 to \$49,999	3,638	17.3%	4,449	18.5%
\$50,000 to \$74,999	1,935	9.2%	5,100	21.2%
\$75,000 to \$99,999	531	2.5%	1,998	8.3%
\$100,000 to \$149,999	170	0.8%	938	3.9%
\$150,000 or more	130	0.6%	372	1.6%
Median Household Income	\$25,168		\$37,636	

Source: U.S. Census 1990 and 2000

Per capita personal income is defined as total personal income divided by the total population. Per capita income information is not available for the city only. The following table shows how per capita personal income for the Appleton-Oshkosh-Neenah Metropolitan Area compares to that of Winnebago County and the State. Per capita personal income was computed using Census Bureau midyear population estimates. Table 4 shows that the State had the highest rate of average annual increase at 5.2 percent, followed by the Appleton-Oshkosh-Neenah Metropolitan Area at 4.8 percent and by Winnebago County at 4.1 percent.

Table 4. Per Capita Income Comparison	1997	1998	1999	2000	2001	Average Annual Percent Change 1997-2001
Appleton-Oshkosh-Neenah Metro. Area	\$24,552	\$25,858	\$27,030	\$28,626	\$29,579	4.8%
Winnebago County	\$24,501	\$26,158	\$26,918	\$28,092	\$28,704	4.1%
Wisconsin	\$22,149	\$23,515	\$24,517	\$26,176	\$27,141	5.2%

Source: U.S. Bureau of Economic Analysis, Wisconsin Department of Commerce Special Report, 2003

C. Employment/Labor Force Data

Table 5 shows the distribution of employed Oshkosh residents aged 16 years and over during the last three censuses by occupation. Overall, there has been a steady increase in the number and percentage of "Management and Professional" occupations and small decreases in those occupied in the "Farming, Fishing, and Forestry" sector and in the "Construction, Extraction, and Maintenance Operations" sector.

Table 5. Occupation of Employed persons 16 years and over	1980 Census		1990 Census		2000 Census	
	Number	Percent	Number	Percent	Number	Percent
Management, Professional, & related occupations	4,675	20.3%	6,458	23.8%	9,084	28.3%
Service Occupations	4,267	18.5%	4,615	17.0%	5,829	18.1%
Sales and Office Occupations	6,848	29.7%	8,316	30.6%	8,627	26.8%
Farming, Fishing, and Forestry Occupations	119	0.5%	95	0.3%	75	0.2%
Construction, Extraction, and Maintenance Occupations	2,456	10.7%	2,529	9.3%	1,913	6.0%
Production, Transportation, and Material Moving Occupations	4,696	20.4%	5,157	19.0%	6,603	20.6%
Total	23,061		27,170		32,131	

Source: U.S. Census 1980, 1990, and 2000

In the 2000 Census, approximately 80 percent of workers were in the private sector, 17 percent were government workers, and 3 percent were self-employed. These proportions were similar to the distribution in the 1990 Census.

Table 6 shows the manufacturing and non-manufacturing employers with over 200 employees in the city. In the manufacturing section, "Curwood, Inc./Bemis" is the largest employer with over 2,000 employees. In the non-manufacturing sector, the largest employer is the "Affinity Medical Group" with over 2,600 employees. The number of employees shown includes residents and non-residents of the city.

Table 6. Major Local Employers		
<i>Manufacturing Firm</i>	<i>Product</i>	<i>Employees</i>
Curwood Inc. / Bemis	Packaging Tape / Plastic Film	2,055
Oshkosh Truck Corp.	Specialized Trucks	1,703
Miles Kimball	Mail Order Distribution	565
Hoffmaster, A Solo Cup Company	Paper Specialties	486
Oshkosh B'Gosh	Family Apparel	296
Jeld-Wen Premium Wood Doors	Wood Building Products	200
<i>Non-Manufacturing Firm / Organization</i>	<i>Product / Service</i>	<i>Employees</i>
Affinity Medical Group	Health Care	2,623
University of Wisconsin-Oshkosh	Education	1,632
Oshkosh Area School District	Education	1,572
Winnebago County	Government	1,117
US Bank	Bank	900
Aurora Medical Group	Clinic / Health Care	750
Winnebago Mental Health Institute	Health Care	750
City of Oshkosh	Government	650
Oshkosh Correctional Institution	Correctional Facility	518

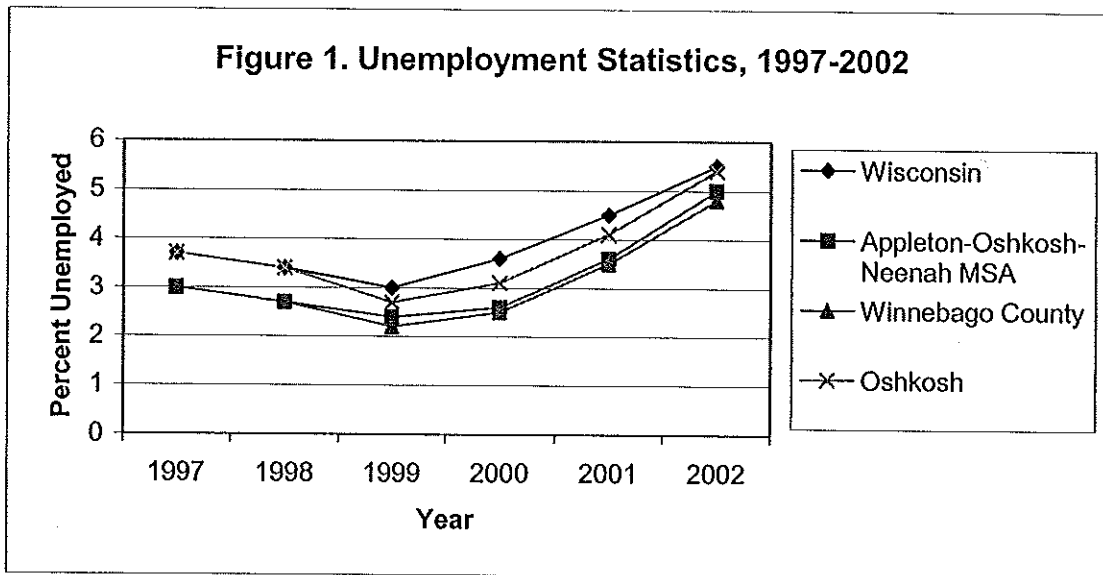
Source: Oshkosh Chamber of Commerce, December 2004

The total labor force is the sum of employed and unemployed people (aged 16 years and older) actively seeking work. The total labor force for the city has steadily increased since 1999, unfortunately so has the unemployment rate. As shown in Table 7 between the years of 1997 and 2002, 1999 had the lowest unemployment rate and the fewest unemployed persons.

Table 7. City of Oshkosh Civilian Labor Force	1997	1998	1999	2000	2001	2002
Employed	35,890	36,923	36,144	37,771	38,025	37,786
Unemployed	1,392	1,308	989	1,195	1,611	2,157
Total Labor Force	37,282	38,231	37,133	38,966	39,636	39,943
Unemployment Rate	3.7%	3.4%	2.7%	3.1%	4.1%	5.4%

Source: State of Wisconsin Department of Workforce Development, Local Area Unemployment Statistics, May 2003

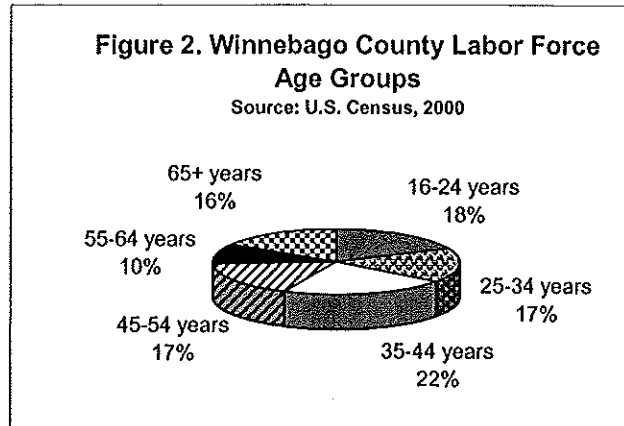
The trends for the Oshkosh labor force have been similar to the trends at the County and State level. Since 1997, Oshkosh consistently had an unemployment rate higher than the County and the Appleton-Oshkosh-Neenah Metropolitan Statistical Area, but the rate was either equal to or lower than the statewide unemployment rate. In June 2003, the city's unemployment rate was 6.5 percent, an increase from 5.8 percent in June 2002.



Since 1999, the city's economic and labor status has mirrored the national trends of the recession cycle. Because of this economic cycle, several businesses within Oshkosh have experienced temporary and permanent layoffs over the past few years. This unemployment trend may begin to slowly reverse with the national announcement of the end of the recession and as Oshkosh continues to diversify its industry sectors.

In addition to the employment and unemployment rates, another economic indicator for the city is the workforce participation rate. The workforce participation rate is the ratio of the labor force to the whole population of the city that is 16 years and over. There is a sector of the population that is considered not to be in the labor force. Examples of those not in the labor force include retired persons, discouraged workers, or persons who choose not to work. Per the Department of Workforce Development (DWD), the 2001 participation rate for Winnebago County is 81.7 percent, an increase of 1.4 percent over the 2000 participation rate. The DWD does not calculate a specific participation rate for the city; but, due to a higher unemployment rate and a large institutional population, the participation rate is estimated to be slightly lower for the City than it is for the County.

The DWD also monitors the dispersion of the labor force over age groups. In Winnebago County, 57 percent of the labor-force-eligible population is below the age of 45, indicating that over the 20-year planning period, this population will be moving through the mature years of their working lives. Maintaining this cohort of workers will lead to fewer concerns of future labor shortages as the "Baby Boomer" generation begins to retire and while a fewer number of youth turning eighteen and are looking for work.



D. Housing Profile

Table 8 shows selected housing characteristics from the last three censuses. The Census defines a household as all persons occupying a housing unit whether related or unrelated. Persons not living in households are classified as living in group quarters. Group quarters include non-institutional settings such as dormitories and institutional settings such as prisons. A housing unit includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

Table 8. Selected Housing Characteristics	1980 Census	1990 Census	2000 Census
Total Persons	49,620	55,006	62,916
Persons in Households	45,920	50,182	55,574
Group Quarters –			
• Institutionalized population	511	1,091	3,516
• Noninstitutionalized population	3,189	3,733	3,826
Percent of Population (5 years and older) living in the same house 5 years before the Census	50.4%	47.6%	45.7%
Owner-Occupied Housing Units	11,098	11,942	13,851
Renter-Occupied Housing Units	7,188	9,015	10,231
Average household size:			
• Owner-occupied units	2.78	2.6	2.49
• Renter-occupied units	2.09	2.1	2.06

Source: U.S. Census 1980, 1990, and 2000

Table 9 shows the distribution of households by tenure (renter-occupied versus owner-occupied) and census tract. Data from census tracts on the periphery of the city, which include areas in both city and town, have been modified to show only City of Oshkosh information.

Table 9. Housing Units by Census Tract	Total Housing Units	Renter-Occupied Units		Owner-Occupied Units		Vacant Units	Median Age of Housing Stock
		Number	Percent	Number	Percent		
1	1,346	506	40%	763	57%	77	Prior to 1939
2	1,201	620	55%	509	42%	72	Prior to 1939
3	1,816		%	1,195	66%		
4	1,272	415	34%	804	63%	53	1948
5	2,679	1,574	63%	928	35%	177	Prior to 1939
7	851	669	82%	143	17%	39	1954
8	1,544	518	35%	946	61%	80	1943
9	1,185		%	732	62%		
10	1,315	561	47%	636	48%	118	1971
11	2,074	996	51%	960	46%	118	1971
12	963	381	42%	535	56%	47	Prior to 1939
13	1,220		%	832	68%		
14	1,927		%	1,348	70%		
15	1,576	573	39%	908	58%	95	Prior to 1939
16	642		%	318	50%		
17	380		%	201	53%		
18	3,160		%	1,943	61%		
19	208	230	14%	132	63%		
Total	25,359						

Source: U.S. Census 2000

According to the 2000 U.S. Census, over half of the city's housing stock was constructed prior to 1960. The table below shows the distribution of units based upon the year of construction. Because of the age of the housing stock, maintenance and rehabilitation of older housing will be a continuous issue to address over the planning period.

Table 10. Distribution of Housing Units, based on Year Built	Housing Units	Percent of Total Units
1999-March 2000	402	1.6%
1995-1998	1,724	6.8%
1990-1994	1,843	7.3%
1980-1989	2,592	10.2%
1970-1979	3,029	11.9%
1960-1969	2,720	10.7%
1940-1959	5,029	19.8%
1939 and Prior	8,020	31.6%
Total	25,359	

Source: U.S. Census 2000

The Uniform Dwelling Code (UDC) applies to all housing constructed after June 30, 1980. The State of Wisconsin mandates that all communities with a population of over 2,500 people enforce the UDC. Over time, the city has adopted some exceptions to the code. Some of these exceptions include regulations for the city's older housing stock, recognizing that certain types of required code work would compromise the historic character of these older properties. This is significant given almost 75 percent of the city's housing stock was constructed prior to 1980.

E. Other Relevant Data

The Home Mortgage Disclosure Act (HMDA) was enacted by Congress in 1975 and is implemented by the Federal Reserve Board's Regulation C. This regulation provides this public loan data that can be used to assist:

- in determining whether financial institutions are serving the housing needs of their communities;
- public officials in distributing public-sector investments so as to attract private investment to areas where it is needed; and,
- in identifying possible discriminatory lending patterns.

This regulation applies to certain financial institutions, including banks, savings associations, credit unions, and other mortgage lending institutions. In 2004, there were approximately 41.6 million loan records for calendar year (CY) 2003 reported by 8,121 financial institutions.

The following tables were reviewed and analyzed in preparation of this document and are included in Appendix B:

- Aggregate Table 1: Disposition of Loan Applications, by Location of Property and type of Loan, 2003
- Aggregate Tables 4-1 through 4-4: Disposition of Application for Loans by Race, Gender, and Income of Applicant, 2003 (four types of loans)
- Aggregate Tables 5-1 through 5-4: Disposition of Application for Loans by Income and Race of Applicant, 2003 (four types of loans)
- Aggregate Tables 7-1 through 7-4: Disposition of Applicants for Loans by Characteristics of Census Tracts in Which Property is Located (four types of loans)
- Aggregate Tables 8-1 through 8-4: Reasons for Denial of Applications for Loans by Race, Gender and Income of Applicant (four types of loans)

The four types of loans included in the tables are:

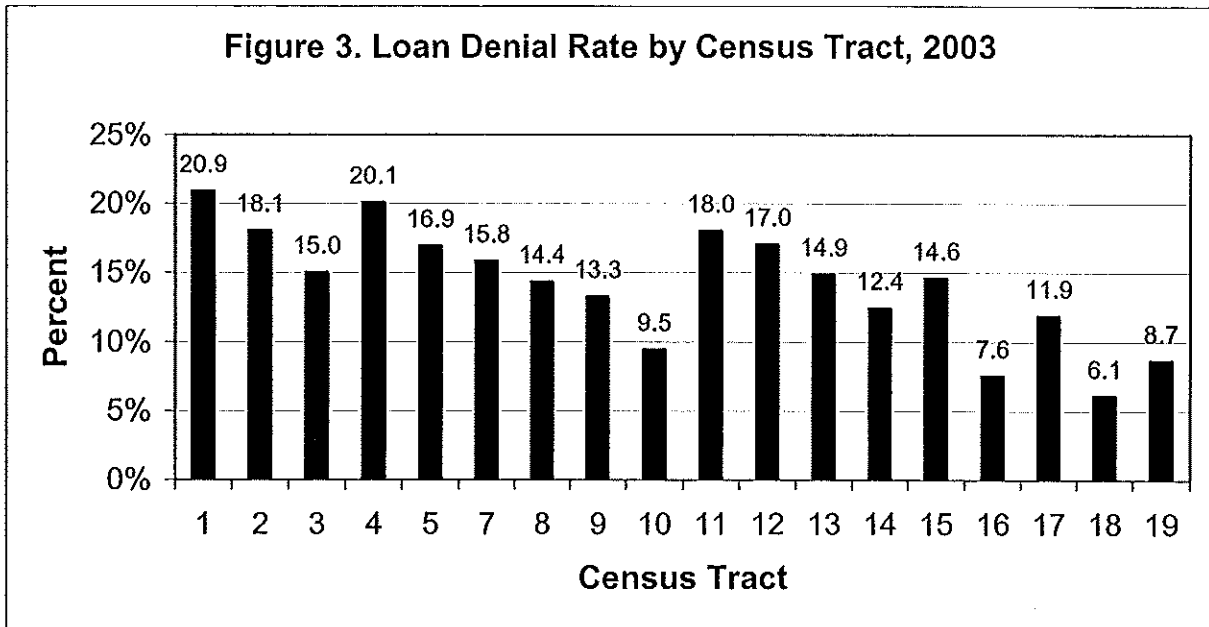
- FHA, FSA/RHS & VA (Home purchase loans)
- Conventional (Home purchase loans)
- Home Refinancings
- Home Improvement

For purposes of evaluating impediments to fair housing choice, only loans on 1-to-4 family dwellings were evaluated.

Aggregate Table 1: Disposition of Loan Applications, by Location of Property and type of Loan, 2003 is the only table of those listed above that presents the data based on a census tract level. The city is either wholly or partially included within 18 Census Tracts, therefore analysis of property only within the municipal limits of the city is not possible. Aggregate Table 1 presents information regarding the number of loans originated, loans approved but not accepted, applications denied, applications withdrawn, and files closed for incompleteness. In 2003, a total of 5,796 loan applications (1,297 for home purchase, 4,276 for refinancing, and 223 for home improvements) were submitted for the 18 Census Tracts. As shown in the chart below, loan denial rates vary significantly by census tract from 6.1% through 20.9%, with an overall community-wide denial rate of 12.2%.

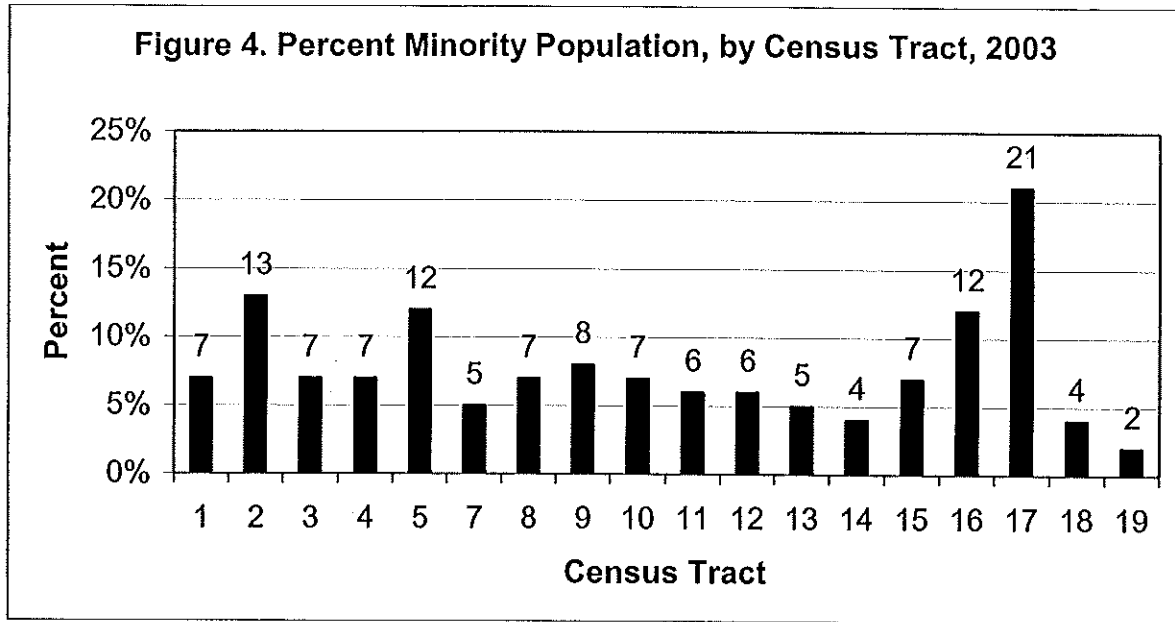
The City of Oshkosh is part of the Appleton-Oshkosh-Neenah Metropolitan Statistical Area (MSA). In 2003, loan applications for the MSA totaled 47,382 (8,914 home purchase, 36,340 refinancing, and 2,128 home improvement). The denial rate for these loans is 11.1% at the MSA level, which is slightly lower

than the average denial rate of 12.2% for the 18 census tracts of the City of Oshkosh. Given this slight difference between the city and the MSA, no consequential variations are noted from this level of review.



There are four census tracts that have 1.5 to almost 2 times the city-wide loan denial rate. As shown in Figure 3 above, these four Census Tracts are 1, 2, 4, and 11. It is unclear why these tracts have higher than average denial rates. Each of these four census tracts have LMI block groups within their periphery, which may be one of the contributing factors to a higher denial rate, indicated that lower income persons may be less able to secure financing.

As stated earlier in the demographic data of the city, the minority (non-white) population of the city is 7.3% of the overall population. Note that in Aggregate Table 1, percentage minority population means the percentage of the total population in a particular census tract consisting of those of non-white races, and whites of Hispanic origin. Percentages are rounded to the nearest full percentage point. Only four census tracts have a minority rate higher than 10 percent: 2, 5, 16, and 17. Of these four, only tracts 2 and 5 are germane to this report due to the location of state and county institutions in tracts 16 and 17.



Census Tract 1 has a minority population (7%) that is at the average for the city (7.3%) and an owner-occupancy rate (57%) that is at the average for the City (57.5%). Census Tract 1 is located along Lake Winnebago, just east of the core central city area.

Census Tract 2 has a minority population (13%) that is almost double the rate for the city (7.3) as a whole and an owner-occupancy rate (42%) that lower than the average for the City (57.5%). Census Tract 2 is adjacent to Census Tract 1. It also is located along Lake Winnebago, but is northeast of the central city area. This is the only census tract with a high rate of loan denial and a higher than average minority population.

Census Tract 4 has a minority population (7%) that is at the average for the city (7.3%) and an owner-occupancy rate (63%) that is higher than the average for the City (57.5%). Census Tract 4 is located within the north-central portion of the city.

Census Tract 11 has a minority population (6%) that is slightly lower than the average for the city (7.3%) and an owner-occupancy rate (46%) that is much lower than the average for the City (57.5%). Census Tract 11 is located on the south side of the Fox River, west of the central city extending to Highway 41.

While Census Tracts 1, 2, 4, and 11 have higher loan denial rates, is it not clear that the denial rates are based on geographic location or on minority status. What is clear however, is that refinancing and home improvement loans are the majority of loans being denied. This indicates that there are potential issues of deferred maintenance in these neighborhoods.

Aggregate Tables 4-1 through 4-4: Disposition of Application for Loans by Race, Gender, and Income of Applicant, 2003 (four types of loans)

Table 11 summarizes information from Aggregate Tables 4-1 through 4-4. These four tables summarize disposition of loans by race, gender, and income of the applicant. Loans for the MSA have been categorized by the four loan types and by the status of those loans. For the purposes of this document, "Applications Denied" have been analyzed and compared to local and regional averages. In 2003 for the MSA, 11.1% of total loan applications were denied.

The greatest number of loan applications was for refinancing, although the highest percentage of loans denied was for home improvement loans.

	FHA, SFARHS, and VA Home-Purchase Loans	% of Loans Received	Conventional Home-Purchase Loans	% of Loans Received	Refinancings	% of Loans Received	Home Improvement Loans	% of Loans Received	Totals	Percent of Total Applications
Loans Originated	812	87.8%	6,352	79.5%	27,406	75.4%	1,564	73.5%	36,134	76.3%
Approved, Not Accepted	18	1.9%	387	4.8%	1,507	4.1%	89	4.2%	2,001	4.2%
Applications Denied	43	4.6%	607	7.6%	4,279	11.8%	346	16.3%	5,275	11.1%
Application Withdrawn	45	4.9%	583	7.3%	2,709	7.5%	114	5.4%	3,451	7.3%
Files Closed for Incompleteness	7	0.8%	60	0.8%	439	1.2%	15	0.7%	521	1.1%
Total Applications	925		7,989		36,340		2,128		47,382	

Applicants are categorized by the ratio of their reported income to the median family income of the MSA. The median family income of the MSA is based on estimates developed by the Department of Housing and Urban Development (HUD), which are updated annually. The figure for the MSA is the HUD estimate for the fiscal year that corresponds to the year for which the loan/application data are reported.

Applicants whose income was reported as "Income Not Available" for Aggregate Tables 4-1 through 4-4 are not included in Table 12 below. Unexpectedly, the total number of loans denied does not necessarily decrease as income increases. The highest number of applications denied was for applicants with 50-79% of the MSA median income. The second highest number of loans denied was for applications with 120% or more of the MSA median income.

	FHA, SFARHS, and VA Home-Purchase Loan Applications	Loans Denied (% of this loan type)	Conventional Home-Purchase Loan Applications	Loans Denied (% of this loan type)	Refinancing Applications	Loans Denied (% of this loan type)	Home Improvement Loan Applications	Loans Denied (% of this loan type)	Total Applications	Loans Denied (% of Total)
Less Than 50% of MSA Median	171	16 (9.4%)	887	134 (15.1%)	2,921	666 (22.8%)	239	65 (27.2%)	4,218	881 (20.9%)
50-79% of MSA Median	385	17 (4.4%)	2,052	186 (9.1%)	7,969	1,310 (16.4%)	547	105 (19.2%)	10,953	1,618 (14.8%)
80-99% of MSA Median	170	4 (2.4%)	1,291	78 (6.0%)	5,807	716 (12.3%)	392	63 (16.1%)	7,660	861 (11.2%)
100-119% of MSA Median	113	4 (3.5%)	1,098	58 (5.3%)	5,326	561 (10.5%)	332	95 (28.6%)	6,869	718 (10.5%)
120% or more of MSA Median	64	0 (0%)	2,324	100 (4.3%)	11,432	874 (7.6%)	583	63 (10.8%)	14,403	1,037 (7.2%)
Total	903	41 (4.5%)	7,652	556 (7.3%)	33,455	4,127 (12.3%)	2,093	391 (18.7%)	44,103	5,115 (11.6%)

Of the total 44,103 total applications, 5,115 (11.6%) of the applications were denied. The greatest number of loan applications came from those applicants with 120% or more of the MSA Median Income, followed by those with 50-79% of the MSA Median Income. For both of these income levels and the three other levels as shown in the table, the highest number of denials occurred in the "Refinancing" category of loan type.

As noted earlier the denial rates for refinancing and home improvement loans are higher than the average denial rate for the MSA. In this table above, the most refinancing loans were denied for those with 50-79% of the MSA median income. This same income level had the highest number of home improvement loans denied.

Aggregate Tables 5-1 through 5-4: Disposition of Application for Loans by Income and Race of Applicant, 2003 (four types of loans)

Aggregate Tables 5-1 through 5-4 summarize the disposition of loans (by the four loan types) by income and the race of the applicant. Again, this data is reported on the MSA level for the Appleton-Oshkosh-Neenah area. For summary purposes, the Tables 13 and 14 show the application status for all four loan types combined, by race and income levels.

Table 13: Appleton-Neenah-Oshkosh MSA, Disposition of Applications, by Income and Race of Applicant	American Indian / Alaskan Native-		Asian/Pacific Islander		Black		Hispanic		White	
	Total Loan Applications	Loans Denied (% Apps for this Race)	Total Loan Applications	Loans Denied (% of Apps for this Race)	Total Loan Applications	Loans Denied (% of Apps for this Race)	Total Loan Applications	Loans Denied (% of Apps for this Race)	Total Loan Applications	Loans Denied (% of Apps for this Race)
Less than 50% of MSA Median	19	3 (15.8%)	56	14 (25.0%)	7	4 (57.1%)	68	22 (32.4%)	3,587	622 (17.3%)
50-79% of MSA Median	21	2 (9.5%)	105	16 (15.2%)	20	7 (35.0%)	111	16 (14.4%)	9,570	1,181 (12.3%)
80-99% of MSA Median	21	3 (14.3%)	90	8 (8.9%)	12	4 (33.3%)	43	8 (18.6%)	6,813	613 (9.0%)
100-119% of MSA Median	9	4 (44.4%)	41	9 (22.0%)	15	3 (20.0%)	17	5 (29.4%)	6,220	470 (7.6%)
120% or more of MSA Median	16	2 (12.5%)	99	9 (9.1%)	21	4 (19.0%)	31	3 (9.7%)	13,016	721 (5.5%)
Total	86	14 (16.3%)	391	56 (14.3%)	75	22 (29.3%)	270	54 (20.0%)	39,206	3,607 (9.2%)

Caution must be used when reviewing Tables 12 and 13 due to the seemingly high denial rates that result from small actual numbers of applications and loan denials. For example, 57.1% of loans were denied for Blacks in the less than 50% MSA Median category; however, this totaled only 4 denied applications.

As stated earlier, the city-wide denial rate of loan applications is 12.2% and the MSA denial rate is 11.1%. For each of the four major non-white race categories (Asian, Black, etc.), the denial rate for loans is higher than the city or MSA rates. The denial rates for American Indian/Alaska Natives and Asian/Pacific Islanders are only slightly higher than the MSA denial rate. However, the denial rates for Blacks and Hispanics are approximately twice as high as the city and MSA denial rates.

For evaluation purposes, those reporting "Other", "Joint", or "Race Not Available" as their race have not been included in this analysis. This data is summarized in Appendix A.

Aggregate Tables 7-1 through 7-4: Disposition of Applicants for Loans by Characteristics of Census Tracts in Which Property is Located (four types of loans)

Aggregate Tables 7-1 through 7-4 show the disposition of applications for loans by characteristics of the census tract in which the property is located. These four aggregate tables show the distribution of the four types of loans by census tracts in the MSA. The census tracts are categorized with five levels of minority composition (Less than 10%, 10-19%, 20-49%, 50-79%, and 80-100%). No census tract in the MSA of three counties has over 50% minority population. The City of Oshkosh has only one census tract with a minority population over 20%, tract 17 and that tract contains a large institutional population.

The census tracts are then categorized with four income levels (low, moderate, middle, and upper). The low-income category consists of census tracts where the median family income is less than 50 percent of the median MSA income, based on the 2000 census of population and housing. The moderate-income category consists of census tracts where the median family income is between 50 and 80 percent of the median MSA income. The middle-income category consists of census tracts where the median family income is between 80 and 120 percent of the median MSA income. The upper-income category consists of census tracts where the median family income is 120 percent or more of the median MSA income. No applications were received for low-income census tracts for any of the four loan types.

Table 7-1 summarizes applications for FHA, FSA/RHS, and VA home purchase loans. This table shows that of the 925 loan applications, 15% (138) were for census tracts with more than 10% minority composition. Of the 43 denied applications, 21% (9) were for applications in census tracts with more than 10% minority composition. For all of the denied applications, 23% (10) were for moderate income census tracts.

Table 7-2 summarizes applications for conventional home purchase loans. This table shows that of the 7,989 loan applications, 11% (911) were for census tracts with more than 10% minority composition. Of the 607 denied applications, 14% (82) were for applications in census tracts with more than 10% minority composition. For all of the denied applications, 11% (69) were for moderate income census tracts.

Table 7-3 summarizes applications for refinancing loans. This table shows that of the 36,340 loan applications, 10% (3,779) were for census tracts with more than 10% minority composition. Of the 4,279 denied applications, 13% (552) were for applications in census tracts with more than 10% minority composition. For all of the denied applications, 11% (490) were for moderate income census tracts.

Table 7-4 summarizes applications for home improvement loans. This table shows that of the 2,128 loan applications, 13% (269) were for census tracts with more than 10% minority composition. Of the 346 denied applications, 18% (62) were for application in census tracts with more than 10% minority composition. For all of the denied applications, 12% (42) were for moderate income census tracts.

Unexpectedly, the total number of loans denied does not necessarily decrease as income increases. The highest number of applications denied was for applicants with 50-79% of the MSA median income. The second highest number of loans denied was for applications with 120% or more of the MSA median income.

Aggregate Tables 8-1 through 8-4: Reasons for Denial of Applications for Loans by Race, Gender and Income of Applicant (four types of loans)

Aggregate Tables 8-1 through 8-4 present the reasons for denial of loan applications by race, gender, and income of the applications for all four types of loans. Reasons for denial are sorted into nine general categories. The highest number and percentage of loans were denied for "Credit History", followed by "Credit Application Incomplete". (Note: "Other" was excluded in this analysis because of no description of what this category represents.)

Table below summarizes the reasons for denial among the four types of loans. It is clear that credit history is the major reason for denial of applications. This implies a need for teaching both potential and

existing homeowners about budgeting and managing finances. An improved credit history increases the likelihood of loan approval, and obtaining a loan with a more favorable rate.

The number of denials should be interpreted with some caution. With the HMDA data it is difficult to determine if the 5,126 denied applications represented unique applicants or if there were repeated applications among those denied. For example, if one homeowner was denied based on credit history at one lending institution and then later denied at a second lending institution for an incomplete credit application, these were reported as two denials but for one applicant who may have been successful at a third lending institution.

Table 14. Reasons for Denial of Loan Application for all Four Loan Types	Number of Applications Denied	Percent of Total Applications Denied
Debt-to-Income Ratio	681	13.3%
Employment History	70	1.4%
Credit History	1,365	26.6%
Collateral	593	11.6%
Insufficient Cash	52	1.0%
Unverifiable Information	242	4.7%
Credit Appl. Incomplete	877	17.1%
Mortgage Insurance Denied	7	0.1%
Other	1,239	24.2%
Total	5,126	100

Aggregate Table 8-1 provides reasons for denial of FHA, FSA/RHS, and VA Home Purchase Loans by race and income of applicant. Of the 53 applications denied, 17 (32%) were denied based on credit history and 15 (28%) were denied based on the debt-to-income ratio. Cross-referencing reasons for denial with income levels, the highest frequency of denials (8) was for debt-to-income reasons for applicants earning less than 50% of the MSA median income.

Aggregate Table 8-2 provides reasons for denial of conventional home loans by race and income of applicant. Of the 599 applications denied, 207 (35%) were denied based on credit history and 105 (18%) were denied based on the debt-to-income ratio. Cross-referencing reasons for denial with income levels, the highest frequency of denials (70) was for credit history reasons for applicants with 50-79% of the MSA median income.

Aggregate Table 8-3 provides reasons for denial of refinancing loans by race and income of applicant. Of the 4,088 applications denied, 949 (23%) were denied based on credit history and 830 (20%) were denied based on an incomplete credit application. Cross-referencing reasons for denial with income levels, the highest frequency of denials (302) was for credit history reasons for applicants with 50-79% of the MSA median income.

Aggregate Table 8-4 provides reasons for denial of home improvement loans by race and income of applicant. Of the 386 applications denied, 192 (50%) were denied based on credit history and 74 (19%) were based on debt-to-income ratio. Cross-referencing reasons for denial with income levels, the highest frequency of denials (67) was for credit history for applicants with 50-79% of the MSA median income.

IN CONCLUSION

- In 2003, 75% of the loan applications were for refinancing loans. Of these refinancing loans, 13% were denied.
- The loan applicants with an income level of 50-79% of MSA Median income had the highest rate and frequency of denial.
- Of all four types of loan applications in the City of Oshkosh, 12.2% were denied, which is slightly higher than the MSA denial rate of 11.1%.

- Race is either underreported ("Race Not Available") or minority populations are under represented in loan applications.
- The rate of denial for the four loan types do not differ significantly based on census tracts with higher minority concentrations
- The total number of loans denied does not necessarily decrease as income increases. The highest number of applications denied was for applicants with 50-79% of the MSA median income. The second highest number of loans denied was for applications with 120% or more of the MSA median income.
- Credit history, incomplete credit applications, and debt-to-income ratios are the three primary reasons for loan denials.

While Census Tracts 1, 2, 4, and 11 have higher loan denial rates, is it not clear that the denial rates are based on geographic location or on minority status. What is clear however, is that refinancing and home improvement loans are the majority of loans being denied. This indicates that there are potential issues of deferred maintenance in these neighborhoods.

F. Map

The following map shows the census tracts and block groups that are Low to Moderate Income based on the 2000 U.S. Census, the percentages of minority household and loan denial rate in those tracts

A census tract or block group within a census tract is classified as low to moderate income if 51% of the households living in that area have incomes below 80% of the county median income.

MAP

III. Evaluation of Jurisdiction's Current Fair Housing Legal Status

Section 106.50 of the Wisconsin Statutes prohibits discrimination based on race, color, religion, national origin, ancestry (1965), sex (1975), age-18 and over, disability, lawful source of income, marital status (1980), and sexual orientation (1982), exemption for housing for older persons, family status, and accessibility requirements (1992) and authorizes the Department of Workforce Development to promulgate such rules as are necessary to carry out this section (Wisconsin Administrative Code-Chapter 220-Fair Housing). Enforcement is initiated by filing a complaint with the Equal Rights Division within one year of the alleged discriminatory act or through circuit court.

A. Fair Housing Complaints

The State of Wisconsin Equal Rights Division (ERD) reported that between January 1, 2000 and December 15, 2004, six complaints were received from Oshkosh. Of these six complaints, three were dismissed because they failed to demonstrate probable cause; one was settled privately; one was settled after probable cause finding; and the last one had a finding of probable cause and then elected to go to court. Of the six complaints two were based on Race, one regarding Disability; one regarding Family Status; one regarding Race & Sex; and, one regarding Sex/Family Status/Marital Status.

Of the one complaint from the City of Oshkosh received by HUD's Office of Fair Housing and Equal Opportunity from January 2000 through December 2004, the case was closed due to a no cause determination.

Because the Fair Housing Council of Northeast Wisconsin (FHCNEW) does not provide more specific information regarding complainants, it is difficult to present the information in this format regarding complaint intake, case closure, and cases still open from year to year. With that disclaimer, during the May 2000 through December 2004, 13 complaint intakes were received by FHCNEW from Oshkosh. Of these 13, two were referred to ERD, one reached settlement, with the remainder being open and closed for processing. It is not clear if a closed case is one that reached agreement or if there was a finding of no probable cause.

B. Fair Housing Discrimination Suits

The Winnebago County Clerk of Courts was contacted to determine whether any fair housing lawsuits had been submitted in the January 2000 to December 2004 timeframe. The Clerk of Courts reported that these types of discrimination suits are not a separate classification code in the records system and was not able to give a specific report. The Clerk of Courts did say that she did not recall any recent suits of this type.

C. Reasons for Trends or Patterns

Based on the small number of complaints filed, there is not a clear basis (Race, Age, Disability, etc.) on which a majority of the claims are made. One clear pattern in examining the basis for claims is that there are a lot of misunderstandings about what constitutes a valid fair housing complaint. Of the six complaints received by the State, three were dismissed due to failure to demonstrate probable cause. This pattern of misunderstanding indicates there is a need to educate tenants and homeowners about their fair housing rights and the proper steps to take with valid complaints.

D. Discussion of other fair housing concerns or problems

The City of Oshkosh last updated its Fair Housing Ordinance in April 1990. The powers and duties of the Equal Opportunities in Housing Commission are provided in this Ordinance. The Commission was established in 1965 to investigate fair housing complaints and enforce the City's Fair Housing Ordinance. The Commission has five members. It is noted that the state and federal regulations are more restrictive in regulations and with larger penalties/fines than the local ordinance. Because of these different

regulations, there are instances where violations of the state and federal law occur, but not necessarily the local ordinance. Should such a situation arise and until such a time where the city's ordinance is as restrictive as the state and federal law, the complaint would be referred to the State of Wisconsin or the U.S. Department of Housing and Urban Development for action, rather than having the complaint enforced at the local level.

IV. Identification of Impediments to Fair Housing Choice

A. Public Sector

1. Zoning and Site Selection

The City does not have restrictive zoning regulations that would prohibit housing development. The minimum size for new lots is 7,200 square feet, with a 25-foot setback on the front and rear yards and a 7.5-foot setback on the side yards. Undersized lots of record can be developed, generally averaging the setbacks of the adjacent property.

The City of Oshkosh Inspection Services Division issues building, plumbing, and heating permits. Fees are set up on a sliding scale based on the valuation of the project; therefore, a person constructing a \$90,000 house pays less in fees than a person constructing a \$300,000 house.

Additionally, the city permits use of manufactured housing meeting the applicable building codes. This type of housing unit can provide a more affordable housing alternative than conventional "stick-built" housing.

2. Neighborhood Revitalization, Municipal and Other Services, Employment-Housing-Transportation Linkage

In 2005, the City of Oshkosh adopted a Comprehensive Plan prepared in accordance with the State of Wisconsin's "Smart Growth" legislation. In the Plan is a map showing "Neighborhood Improvement Strategy Areas" which have the highest concentration of rental occupancy, oldest homes, lowest valued homes, and are located within low and moderate income census tracts. The goal for these identified areas is to implement a more holistic approach to neighborhood revitalization, including home rehabilitation, streetscaping/tree planting, door to door code enforcement, street and sidewalk reconstruction, formation of neighborhood groups, etc.

The transportation linkages provided by the Oshkosh Transit Authority (OTA) are essential for low and moderate income persons in order to get to employment and service centers. Of the major employers shown in Table 6, page 6, the OTA has a bus stop at or within a short walking distance 11 of these 16 employment sites. The OTA also serves areas with a high concentration of housing, including the Oshkosh Housing Authority facilities, the UW-Oshkosh campus and surrounding neighborhood, and some private senior/elderly housing buildings. Beginning in 2005, the OTA will start a one-year pilot program bus route focusing on sites that meet the needs of the elderly including, the Senior Center, the Housing Authority facilities, healthcare providers, and shopping centers. If demand is high enough, the OTA will continue this route in the future.

It should also be noted that all OTA busses are capable of transporting those in wheelchairs and alternate handicapped transportation is available through Cabulance. Fares for the elderly and disabled are discounted.

3. PHA and Other Assisted/Insured Housing Provider Tenant Selection Procedures; Housing Choices for Certificate and Voucher Holders

Both the Oshkosh Housing Authority and the Winnebago County Housing Authority serve the City of Oshkosh. The Oshkosh Housing Authority/Winnebago County Housing Authority uses a uniform tenant selection procedure. The Authorities have not had any audit findings from HUD relative to discrimination in its tenant selection procedures. The Oshkosh Housing Authority and the Winnebago County Housing Authority have a combined waiting list for units owned by both entities and there is one combined waiting

list for Section 8 rent assistance and housing authority owned family units. The data below is based on all households on the waiting list with Oshkosh addresses as of January 10, 2005.

Late in 2004, the Housing Authority closed its waiting list. At the time the list was closed, there were about 500 households on the combined list for both Housing Authorities. At the same time the Housing Authority reduced the level of rent assistance to 90% of the fair market rent from the previous 100% level. This change was made due to the increasing levels of subsidies required by those receiving assistance.

Census data indicates that in 2000, 92.7% of households in Oshkosh were White (non-Hispanic), 3% were Asian, 2.2% were Black, less than 1% were American Indian/Alaska Native, and less than 1% were Native Hawaiian/Pacific Islander, and the remaining 1.5% were categorized as Other. The following table shows the distribution of those currently in public housing units and those currently receiving housing vouchers with income and racial breakdown percentages.

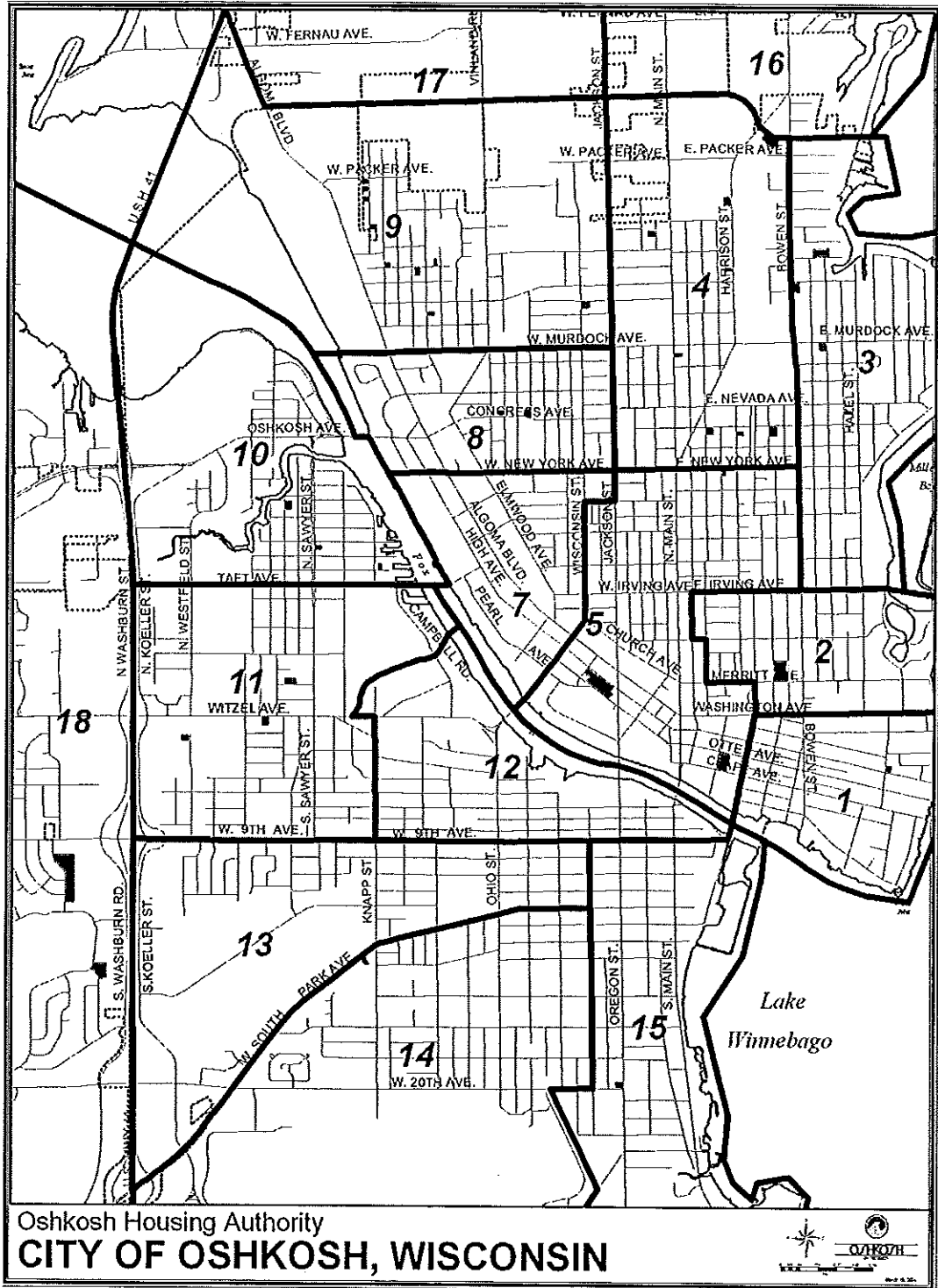
Table 15. Public Housing Unit Distribution	Section 8 – Housing Choice Vouchers		Public Housing Elderly		Public Housing Family		Total Assisted Units	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
<30% MFI	202	87%	317	84%	106	69%	625	82%
30-50% MFI	27	12%	48	13%	33	22%	108	14%
50-80% MFI	2	<1%	10	3%	7	5%	19	2%
Other	1	<1%	1	<1%	7	5%	9	1%
White	204	88%	346	92%	98	64%	648	85%
Black/African American	20	9%	9	2%	18	12%	47	6%
American Indian/Alaska Native	0	0%	2	<1%	1	<1%	3	<1%
Asian	8	3%	15	4%	35	23%	58	8%
Native Hawaiian / Pacific Islander	0	0%	0	0%	0	0%	0	0%
Other	0	0%	4	1%	2	<1%	6	<1%
Total	232		376		153		761	

Source: Oshkosh Housing Authority, 02/05. Note: Some percentage totals may not equal 100% due to rounding.

The percentage of Total Assisted Units for American Indian/Alaska Native, Native Hawaiian/Pacific Islander, and those listed as "Other" are of similar proportion to the general population. For example, less than one percent of the general population is American Indian/Alaska Native and less than one percent of in one of the three described programs are less than one percent of total assisted units.

On the other hand, for the Black/African American and the Asian populations, a higher percentage is being served in assisted units compared to the percentage of these races in the general population.

In preparation of the city's Comprehensive Plan, the following map was prepared to show the disbursement of units owned by the Housing Authorities throughout the city. A map of those using the vouchers is not provided, however a similar city-wide distribution has been achieved.



4. Sale of Subsidized Housing and Possible Displacement

The city knows of no subsidized housing units in Oshkosh that are scheduled for sale.

5. Property Tax Policies

The city is unaware of any property tax policies that would have a negative impact on fair housing choice.

6. Planning and Zoning Boards

Boards and Commissions that have a role in planning, housing, and neighborhood-related issues include the Plan Commission, the Board of Appeals, the Redevelopment Authority, and the Common Council. These boards and commissions in general have been supportive of neighborhood revitalization and housing initiatives through allocation of resources and zoning considerations. No actions by these boards or commissions could be interpreted as impediments to fair housing choice.

B. Private Sector

Lending Policies and Practices

The city is unaware of any violations by local lenders of the Community Redevelopment Act or of audits by the Federal Reserve.

C. Public and Private Sector

Following are sources of assistance to address impediments to Fair Housing Choice.

1. Fair Housing Enforcement

Public Sector

City of Oshkosh – The City of Oshkosh adopted a local Equal Opportunity in Housing ordinance in 1965. Staff is available during times when City Hall is open to address inquiries regarding the provisions of the ordinance. Information regarding the ordinance is available in fair housing brochures developed and distributed by the City. The ordinance is available on line as part of the entire Municipal Code.

State of Wisconsin – The Equal Rights Division (ERD) of the State of Wisconsin Department of Workforce Development enforces the State fair housing law.

U.S. Department of Housing and Urban Development – The Office of Fair Housing and Equal Opportunity (FHEO) administers federal laws and establishes national policies that make sure all Americans have equal access to the housing of their choice.

Particular activities carried out by the Office of Fair Housing and Equal Opportunity include implementing and enforcing the Fair Housing Act and other civil rights laws, including Title VI of the Civil Rights Act of 1964, Section 109 of the Housing and Community Development Act of 1974, Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act of 1990, the Age Discrimination Act of 1975, Title IX of the Education Amendments Act of 1972, and the Architectural Barriers Act of 1968. U.S. Department.

Private Sector

Metropolitan Milwaukee Fair Housing Council/Fair Housing Center of Northeast Wisconsin (FHCNEW) – Funding is provided to this agency to provide fair housing enforcement services. They conduct complaint intake and testing, and where possible, provides the complainant with the testing results and advises the complainant with referral services to State and Federal fair housing enforcement agencies.

2. Informational Programs

Public Sector

City of Oshkosh – The City provides CDBG funding for administrative services related to implementation of the local First Time Homebuyer Program. Of the several topics covered in the program's educational classes, some of them are fair housing and lending practices. Additionally, the logo denoting this program is an "Equal Housing Opportunity" program is added to advertisements about the program.

The City also reminds investor-owners participating in the HOME rental rehabilitation program of their fair housing responsibilities under the program and the law.

Private Sector

Metropolitan Milwaukee Fair Housing Council/Fair Housing Center of Northeast Wisconsin – The purpose of the Metropolitan Milwaukee Fair Housing Council is 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. This organization provides enforcement, training, and educational services on fair housing and rental practices for owners of rental property.

Tenant Resource Center – The Tenant Resource Center (TRC) of Madison offers free counseling for tenants and landlords interested in learning more about their rental rights and responsibilities. Information on state and local rental laws and regulations and lease screening services are available at the TRC. We can also refer clients to other agencies when appropriate to assist them with their needs. Also, TRC offers seminars for caseworkers, landlords and others who work with low- to moderate-income tenants throughout the state. The seminars cover rental agreements, repairs, security deposits, evictions, landlord entry, tenant property left behind, small claims court, fair housing and more.

ADVOCAP-First Time Homebuyer Program – ADVOCAP Homebuyer program provides skills and opportunities for families to acquire a home of their own. The classes offered prepare persons to be educated home buyers and owners. The program is supported by local lenders, and real estate professionals.

FISC – Home financing Education – FISC is a non profit credit counseling agency that cooperated with the city to develop a course to educate home buyers and owners on home financing and related issues. The city offers the course to applicants for the housing rehabilitation program and requires it of those approved for rehabilitation loans who are experiencing credit problems and have little or no home equity. FISC also provides credit education for participants in the Housing Authority Homebuyer program and to Habitat families.

D. Unlawful Segregation or Other Housing Discrimination

Large-scale examples of segregated housing do not exist in Oshkosh. No other determinations of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by HUD under Title VI of the Civil Rights Act of 1964 or Section 504 of the Rehabilitation Act of 1973 or where the Secretary has issued a charge under the Fair Housing act regarding assisted housing have been made in the City of Oshkosh.

V. ASSESSMENT OF CURRENT PUBLIC AND PRIVATE FAIR HOUSING PROGRAMS AND ACTIVITIES IN THE JURISDICTION

After reviewing the public and private fair housing programs and activities available to Oshkosh residents in the previous section, it appears that fair housing services are provided on a continuum basis. Fair Housing is addressed in a proactive manner with outreach and education programs. It is addressed as training/maintenance subject for existing property owners and tenants, and fair housing is addressed on an enforcement basis after educational and training services have not properly addressed issues related to fair housing choice.

This spectrum of services must continue to be provided. With a more proactive approach with educational and training services, the goal is to reduce the need for enforcement-type services. Educational and training services are available

The classified section of the Oshkosh Northwestern was scanned several days during the preparation of this document for possible discriminatory language or inferences. No such language or inferences were found. The Equal Housing Opportunity logo or abbreviation was in most ads from larger real estate agency and larger rental property listings. No such logo or abbreviation was in the medium and small-market rental listings, which are not required to contain the logo because of the size of the advertisement.

The Wisconsin Newspaper Association has prepared the Legal Guide to Advertising. This Guide presents basic information to newspaper companies about federal and state laws, which regulate advertising. Of the several topics covered, one is "Fair Housing". In this Guide, users are informed about housing discrimination; terms that can be construed as discriminatory, and requirements for inclusion of the logo based on the advertisement size.

Almost 200 local realtors were identified as members of the REALTORS® Association of Northeast Wisconsin (RANW). The RANW works in cooperation with the Wisconsin REALTORS® Association (WRA) to provide members with courses to fulfill the Continuing Education Real Estate and Appraiser requirements. Under a "fair housing" search request on the WRA's website (www.wra.org), 209 results were presented, indicating much information about fair housing is available in the form of presentations, conferences, telephone hot lines, articles and brochures.

VI. CONCLUSIONS AND RECOMMENDATIONS

CONCLUSIONS

Overall, it appears the City of Oshkosh:

- Does not have significant amount of valid housing complaints;
- Does not have over burdensome requirements by municipal codes that limit housing choice and affordability options;
- Can and should continue to be part of the education process for tenants and landlords;
- Can and should continue the owner-occupied rehabilitation program;

RECOMMENDATIONS

Education

Fair Housing - A proactive approach to educating service providers about fair housing laws is more favorable than going through probable cause findings and further litigation. Education is needed for everyone who is a part of the housing market. Example of those who benefit from fair housing education include: young adults who are renting for the first time in what their responsibilities and rights are as tenants, new landlords managing rental property, families, those with disabilities or special needs, minorities, and families headed by a single female.

Due the number of dismissed cases, it is evident that tenants may not understand what constitutes a viable fair housing complaint.

Financial – Due to the number of loans denied based on credit history and the debt-to-income ratios, education about financial decisions in becoming increasingly important.

One example of a need for financial education in home buying is a new trend for home purchasers who want to avoid paying Private Mortgage Insurance (PMI). If a homeowner puts less than 20 percent down on a home mortgage, lenders often require PMI. PMI protects the lender if the homeowner defaults on the loan. The Homeowners Protection Act of 1998 - which became effective in 1999 - establishes rules for automatic termination and borrower cancellation of PMI on home mortgages. These protections apply to certain home mortgages signed on or after July 29, 1999 for the purchase, initial construction, or refinance of a single-family home. These protections *do not* apply to government-insured FHA or VA loans or to loans with lender-paid PMI.

A new trend observed recently is that lenders are establishing a second mortgage during the home purchase to cover the 20 percent down payment. The result being very new homeowners starting out with two mortgages on their home and very little equity.

The city will continue this our relationship with FISC to provide credit and home financing and related information to applicants for housing rehabilitation loans and those who have received loans who are requesting subordination of those in conjunction with refinancing. The city wants to provide these requestors with information to understand all implications of subordinating or paying off the no-interest, no-payment loan from the city.

Marketing/Promotion

It is also important to promote the agencies that provide enforcement and informational programs. Fair housing is not a frequently discussed topic, but the programs providing services or funding

those services should better promote what services can provide those. Visibility of and accessibility to the information and the fair housing service provider is critical.

Technical Assistance

City staff will continue to provide technical assistance to participants in the Housing Authority's Home Buyer program.

Rehabilitation

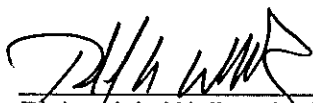
The city will continue to fund the owner-occupied rehabilitation program, with CDBG funds. As noted in the city's Consolidated Plan (adopted 2005),

Historically low interest rates have made it possible for increasing numbers of low and moderate income households to become owners. Many of these households have had to resort to subprime loans due to poor credit scores. Unfortunately, financing rates and terms among subprime lenders can often become more onerous after initial loan periods. The number of low income owner households is not expected to increase as interest rates have stabilized, but the number of low income owner households with housing problems related to both affordability and condition is expected to increase over the period covered by this plan due to complications related to subprime loans and increasing housing costs unanticipated by these households. If any change occurs, there actually may be a drop in the proportion of low-income homeowners during the period covered by this Plan as the rate of foreclosure is already escalating for low-income owners in this market.

Anecdotally, the City is seeing an increase in inquiries and applications for housing rehabilitation assistance from income-qualified owners who have purchased as recently as a month prior to seeking assistance.

The city completes 10-12 owner-occupied rehabilitation projects per Program Year and plans to continue this program in the future. In the past three program years, of the 29 completed projects, 15 were female head-of-households and 5 were for households where at least one person has a disability.

VII. Signature of Chief Official



Richard A. Wollangk, City Manager

10-26-2005

Date

Appendix A

For evaluation purposes, those reporting "Other", "Joint", or "Race Not Available" as their race have not been included in this analysis. If two applicants from different minority groups are reported, they are grouped by the race of the first person listed on the application. "Joint" means white and minority group co-applicants. "Not Available" includes situations where data were not required to be collected or were otherwise not reported.

Table 16-Part 2: Appleton-Neenah-Oshkosh MSA, Disposition of Applications, by Income and Race of Applicant	Other-Total Loan Applications	Other-Loans Denied (% of Apps for this Race)	Joint-Total Loan Applications	Joint-Loans Denied (% of Apps for this Race)	Race Not Available-Loan Applications	Race Not Available (% of Apps for this Race)	Total Loan Applications	Total Loans Denied (% of Total Loan Apps)
Less than 50% of MSA Median	46	19 (41.3%)	29	11 (37.9%)	406	186 (45.8%)	4,218	881 (20.9%)
50-79% of MSA Median	94	42 (44.7%)	115	22 (19.1%)	917	332 (36.2%)	10,953	1,618 (14.8%)
80-99% of MSA Median	66	24 (36.4%)	76	11 (14.5%)	539	190 (35.3%)	7,660	861 (11.2%)
100-119% of MSA Median	48	25 (52.1%)	77	13 (16.9%)	442	139 (31.4%)	6,869	668 (9.7%)
120% or more of MSA Median	115	37 (32.2%)	182	25 (13.7%)	923	236 (25.6%)	14,403	1,037 (7.2%)
Total	369	147 (39.8%)	479	82 (17.1%)	3,227	1,083 (33.6%)	44,103	5,065 (11.5%)

Appendix B

Aggregate Table 1 (only Oshkosh Census Tracts)
Aggregate Tables 4-1 through 4-4
Aggregate Tables 5-1 through 5-4
Aggregate Tables 7-1 through 7-4
Aggregate Tables 8-1 through 8-8

AGGREGATE TABLE 1: DISPOSITION OF LOAN APPLICATIONS, BY LOCATION OF PROPERTY AND TYPE OF LOAN, 2003
 ALL LOANS ON PROPERTY LOCATED IN MSA 207

MSA: 0460 - Appleton-Oshkosh-Neenah, WI

CENSUS TRACT OR COUNTY NAME AND DISPOSITION OF APPLICATION 1/ (STATE/COUNTY/TRACT NUMBER)	Loans on 1-to-4 Family Dwellings										Nonoccupant Loans on 1-to-4 Family Dwellings From Columns A,B,C & D F	Median Income as PCT of MSA 3/ Median		
	Home Purchase Loans					Refinancings							Home Improvement Loans D	Loans on Dwellings For 5 or More Families E
	FHA, FSARHS & VA A		Conventional B		Number		Number		\$000's					
Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	
WINNEBAGO COUNTY/0001.00														
LOAN ORIGINATED	13	1125	43	2986	152	11394	9	85	30	1797	7	76		
APPROVED, NOT ACCEPTED			2	174	8	459			2	74				
APP DENIED	2	124	6	601	66	5222	3	8	6	354				
APP WITHDRAWN	1	59	8	1426	38	3355	3	47	3	808				
FILES CLOSED FOR INCOMPLETENESS			1	121	13	1268								
WINNEBAGO COUNTY/0002.00														
LOAN ORIGINATED	8	663	37	3027	116	8557	9	247	25	1716	13	85		
APPROVED, NOT ACCEPTED	1	119	2	95	7	713	2	24	2	95				
APP DENIED	1	97	4	291	31	1918	9	101	3	172				
APP WITHDRAWN			4	242	14	976	2	38						
FILES CLOSED FOR INCOMPLETENESS					2	64								
WINNEBAGO COUNTY/0003.00														
LOAN ORIGINATED	7	653	58	6582	229	22863	15	297	14	1295	7	105		
APPROVED, NOT ACCEPTED	1	59	5	461	19	1857	1	4	2	245				
APP DENIED			3	310	60	5682	4	66	3	145				
APP WITHDRAWN	1	95	7	503	32	2693			1	104				
FILES CLOSED FOR INCOMPLETENESS					5	565								
WINNEBAGO COUNTY/0004.00														
LOAN ORIGINATED	13	1083	48	3318	149	9683	10	122	18	1411	7	87		
APPROVED, NOT ACCEPTED			2	137	11	801	1	21	4	363				
APP DENIED			11	925	51	3319	6	162	4	10				
APP WITHDRAWN	1	88	1	150	30	2084	1	24	1					
FILES CLOSED FOR INCOMPLETENESS	1	92			2	128								
WINNEBAGO COUNTY/0005.00														
LOAN ORIGINATED	14	1236	77	5492	202	12777	16	401	61	4155	12	76		
APPROVED, NOT ACCEPTED			5	423	17	1189	2	20	3	208				
APP DENIED	5	419	9	642	55	3885	9	106	8	560				
APP WITHDRAWN			4	291	36	2935			3	174				
FILES CLOSED FOR INCOMPLETENESS			2	77	7	434	1	60						
WINNEBAGO COUNTY/0007.00														
LOAN ORIGINATED	1	134	20	1248	50	7616	2	94	5	4196	5	82		
APPROVED, NOT ACCEPTED			3	364	12	3822	1	14	4	3224				
APP DENIED			8	420	2	129			2	144				
APP WITHDRAWN									1	680				
FILES CLOSED FOR INCOMPLETENESS														

CENSUS TRACT OR COUNTY NAME AND DISPOSITION OF APPLICATION 1/ (STATE/COUNTY/TRACT NUMBER)	Loans on 1-to-4 Family Dwellings												Nonoccupant Loans on 1-to-4 Family Dwellings From Columns A,B,C & D F	Median Income as PCT of MSA Median			
	Home Purchase Loans						Home Improvement Loans										
	FHA, FSA/RHS & VA A			Conventional B			Refinancings C			Loans on Dwellings For 5 or More Families E					Loans on 1-to-4 Family Dwellings From Columns A,B,C & D F		
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's			Number	\$000's	
W/WINNEBAGO COUNTY/0008.00														7	79		
LOAN ORIGINATED	8	703	47	3782	194	13603	12	413	1	1531	11	994					
APPROVED, NOT ACCEPTED			3	226	13	985	1	13			2	148					
APP DENIED			3	338	45	3581	6	127			3	478					
APP WITHDRAWN	2	163	2	157	30	2273	4	134			1	100					
FILES CLOSED FOR INCOMPLETENESS					6	281											
W/WINNEBAGO COUNTY/0009.00														8	79		
LOAN ORIGINATED	5	479	64	6159	167	14102	9	209	1	325	11	855					
APPROVED, NOT ACCEPTED					2	286											
APP DENIED			6	621	38	3125	1	28									
APP WITHDRAWN	1	116	6	702	31	3055	2	22			1	59					
FILES CLOSED FOR INCOMPLETENESS	1	139	2	226	4	211											
W/WINNEBAGO COUNTY/0010.00														7	84		
LOAN ORIGINATED	9	897	49	3883	114	7897	11	243			9	495					
APPROVED, NOT ACCEPTED			4	365	11	1075											
APP DENIED			2	202	19	1054	2	60									
APP WITHDRAWN			2	149	18	1388											
FILES CLOSED FOR INCOMPLETENESS					2	133											
W/WINNEBAGO COUNTY/0011.00														6	79		
LOAN ORIGINATED	10	1112	47	4194	153	11239	10	344	2	430	10	987					
APPROVED, NOT ACCEPTED			7	627	9	854	2	23									
APP DENIED	1	94	5	468	47	3500	8	86			1	75					
APP WITHDRAWN			5	375	28	2067	4	98			1	69					
FILES CLOSED FOR INCOMPLETENESS	1	56			1	74											
W/WINNEBAGO COUNTY/0012.00														6	69		
LOAN ORIGINATED	9	744	26	1842	99	6351	4	35			16	1087					
APPROVED, NOT ACCEPTED			3	194	7	487	1	5									
APP DENIED			6	441	27	2380	5	152			2	153					
APP WITHDRAWN			7	402	25	1497					3	84					
FILES CLOSED FOR INCOMPLETENESS			1	57	3	261											
W/WINNEBAGO COUNTY/0013.00														5	81		
LOAN ORIGINATED	12	1143	42	3346	133	8708	15	211			19	1191					
APPROVED, NOT ACCEPTED	1	74	3	238	12	875	4	74			3	132					
APP DENIED	2	184	6	1394	36	2383	2	19			4	180					
APP WITHDRAWN	1	95	9	909	28	1912					3	471					
FILES CLOSED FOR INCOMPLETENESS					3	234											

AGGREGATE TABLE 1: DISPOSITION OF LOAN APPLICATIONS, BY LOCATION OF PROPERTY AND TYPE OF LOAN, 2003
ALL LOANS ON PROPERTY LOCATED IN MSA 20/

CENSUS TRACT OR COUNTY NAME AND DISPOSITION OF APPLICATION 1/ (STATE/COUNTY/TRACT NUMBER)	Loans on 1-to-4 Family Dwellings										Nonoccupant Loans on 1-to-4 Family Dwellings From Columns A,B,C & D F	Loans on Dwellings For 5 or More Families E	Home improvement Loans D	Refinancings C	Conventional B	FHA, FSARHS & VA A	Home Purchase Loans	% MIN POP 3/ of MSA Median Income
	Home Purchase Loans		Refinancings		Conventional		FHA, FSARHS & VA		Home Purchase Loans									
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's								
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's								
WINNEBAGO COUNTY/0014.00																		
LOAN ORIGINATED	11	959	64	5045	249	18260	8	101	1	821	16	1590	4	88				
APPROVED, NOT ACCEPTED	1	107	1	56	10	978	1	10										
APP DENIED			3	277	47	2952	7	298			5	391						
APP WITHDRAWN			9	757	40	3417	1	24										
FILES CLOSED FOR INCOMPLETENESS				6	451													
WINNEBAGO COUNTY/0015.00																		
LOAN ORIGINATED	8	754	58	4730	173	12911	16	316	1	750	26	1905	7	86				
APPROVED, NOT ACCEPTED			6	520	9	653												
APP DENIED			4	271	45	2843	4	51			1	17						
APP WITHDRAWN	1	54	4	579	28	1999	1	9			1	370						
FILES CLOSED FOR INCOMPLETENESS			1	80	4	394	1	2										
WINNEBAGO COUNTY/0016.00																		
LOAN ORIGINATED	1	124	48	5694	198	22931	6	104	1	2928	16	1792	12	107				
APPROVED, NOT ACCEPTED			4	580	10	1650	2	58										
APP DENIED			3	185	21	2540	1	18			3	150						
APP WITHDRAWN	1	165	4	360	21	3027	4	83			2	56						
FILES CLOSED FOR INCOMPLETENESS				6	1122													
WINNEBAGO COUNTY/0017.00																		
LOAN ORIGINATED	9	1074	48	6742	214	24554	8	326			6	555	21	94				
APPROVED, NOT ACCEPTED	1	109	3	287	8	1021												
APP DENIED			6	452	35	4040	3	12			1	4						
APP WITHDRAWN			7	594	21	2057	4	177			1	120						
FILES CLOSED FOR INCOMPLETENESS				3	281						1	25						
WINNEBAGO COUNTY/0018.00																		
LOAN ORIGINATED	15	1855	270	36869	1925	152786	44	1447	4	4322	20	2248	4	118				
APPROVED, NOT ACCEPTED			27	3225	74	8184	5	140										
APP DENIED			11	1518	110	13375	5	287			2	183						
APP WITHDRAWN			19	2260	128	14906	5	150			2	231						
FILES CLOSED FOR INCOMPLETENESS			2	560	12	1446	1	30			1	454						
WINNEBAGO COUNTY/0019.00																		
LOAN ORIGINATED	3	443	95	12544	359	42531	19	417			15	1440	2	107				
APPROVED, NOT ACCEPTED			4	763	19	2188	1	72										
APP DENIED			5	370	46	6439	3	110			3	614						
APP WITHDRAWN			6	712	52	5578	3	51			1	160						
FILES CLOSED FOR INCOMPLETENESS				7	724													

AGGREGATE TABLE 1: DISPOSITION OF LOAN APPLICATIONS, BY LOCATION OF PROPERTY AND TYPE OF LOAN, 2003
ALL LOANS ON PROPERTY LOCATED IN MSA 20/

CENSUS TRACT OR COUNTY NAME AND DISPOSITION OF APPLICATION 1/ (STATE/COUNTY/TRACT NUMBER)	Loans on 1-to-4 Family Dwellings										Nonoccupant Loans on 1-to-4 Family Dwellings From Columns A,B,C & D F	Median Income POP as PCT of MSA Median
	Home Purchase Loans					Loans on 5 or More Families E						
	Home Purchase Loans		Refinancings C		Home Improvement Loans D		Loans on 5 or More Families E		Nonoccupant Loans on 1-to-4 Family Dwellings From Columns A,B,C & D F			
	A	B	C	D	E	F	G	H	I	J	K	L
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
WISCONSIN COUNTY/0020.00												
LOAN ORIGINATED	8	837	90	9781	500	53765	20	473	16	2193	3	93
APPROVED, NOT ACCEPTED			11	1558	31	3546	4	78	1	228		
APP DENIED	2	254	12	834	100	12463	5	255	1	68		
APP WITHDRAWN	1	50	18	1586	66	6970	7	167	4	303		
FILES CLOSED FOR INCOMPLETENESS			1	109	10	928	1	10				
WISCONSIN COUNTY/0021.00												
LOAN ORIGINATED	1	110	33	3785	281	31666	13	224	1	32	7	731
APPROVED, NOT ACCEPTED			5	487	11	1059	1	39				
APP DENIED			13	1083	45	4832	4	124				
APP WITHDRAWN			2	210	29	2554	4	97				
FILES CLOSED FOR INCOMPLETENESS			1	152	4	266						
WISCONSIN COUNTY/0022.00												
LOAN ORIGINATED	8	971	117	13849	686	77493	44	1274	1	420	41	4404
APPROVED, NOT ACCEPTED			8	1214	31	4229	3	13			7	1092
APP DENIED			14	1238	102	10253	11	232			7	666
APP WITHDRAWN			22	2902	73	7425	1	23			6	993
FILES CLOSED FOR INCOMPLETENESS			3	217	20	2513					1	100
WISCONSIN COUNTY/0023.00												
LOAN ORIGINATED	4	477	103	16380	499	69798	24	910			8	1063
APPROVED, NOT ACCEPTED			6	1120	32	5025						
APP DENIED			8	552	42	6094	6	100				
APP WITHDRAWN			10	1505	31	3761	2	42				
FILES CLOSED FOR INCOMPLETENESS					3	433						
WISCONSIN COUNTY/0024.00												
LOAN ORIGINATED	13	1523	204	27656	710	81552	49	1633	3	3231	31	3599
APPROVED, NOT ACCEPTED			19	2447	44	5012	4	257			2	221
APP DENIED	1	134	31	1631	89	10057	5	80			7	730
APP WITHDRAWN	1	177	7	1621	60	7506	1	50				
FILES CLOSED FOR INCOMPLETENESS			1	92	9	980					1	85
WISCONSIN COUNTY/0025.00												
LOAN ORIGINATED	13	1376	35	3228	189	17796	13	282	7	3796	11	1272
APPROVED, NOT ACCEPTED	1	124	3	308	17	1842					2	272
APP DENIED			1	109	28	2452	2	13			1	137
APP WITHDRAWN	2	246	3	270	17	1482			1	492	2	269
FILES CLOSED FOR INCOMPLETENESS			2	267								

CENSUS TRACT OR COUNTY NAME AND DISPOSITION OF APPLICATION 1/ (STATE/COUNTY/TRACT NUMBER)	Loans on 1-to-4 Family Dwellings										Loans on 1-to-4 Family Dwellings From Columns A,B,C & D F	Median Income as PCT of MSA Median		
	Home Purchase Loans					Refinancings							Home Improvement Loans D	Loans on Dwellings For 5 or More Families E
	FHA, FSA/RHS & VA A		Conventional B		Number		Number		\$000's					
Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	
WINNEBAGO COUNTY/0026.01														
LOAN ORIGINATED	9	1151	76	8497	256	24452	14	305	3	2846	16	1128	7	96
APPROVED, NOT ACCEPTED	1	107	9	659	14	1273								
APP DENIED	1	77	3	188	57	5918	4	43			2	147		
APP WITHDRAWN	1	85	8	809	29	2372	2	40			3	231		
FILES CLOSED FOR INCOMPLETENESS														
WINNEBAGO COUNTY/0026.02														
LOAN ORIGINATED	16	1924	46	4498	337	28788	23	571			18	1660	5	103
APPROVED, NOT ACCEPTED			2	202	13	1292					1	106		
APP DENIED			9	580	51	5498	2	14			4	347		
APP WITHDRAWN			3	316	33	3284	1	20			4	382		
FILES CLOSED FOR INCOMPLETENESS					8	913								
WINNEBAGO COUNTY/0027.00														
LOAN ORIGINATED	20	1855	45	3245	189	14525	19	339			19	1210	5	84
APPROVED, NOT ACCEPTED	1	57			16	1061								
APP DENIED	1	105	1	130	44	3132	4	40						
APP WITHDRAWN			2	181	25	1998	2	39						
FILES CLOSED FOR INCOMPLETENESS					7	523								
WINNEBAGO COUNTY/0028.00														
LOAN ORIGINATED	29	2690	84	6365	289	21300	21	422			24	2077	8	81
APPROVED, NOT ACCEPTED	1	67	5	313	31	2380	1	4			1	69		
APP DENIED	2	217	8	468	70	5188	7	63			4	153		
APP WITHDRAWN	2	239	8	539	38	2942	2	14			5	321		
FILES CLOSED FOR INCOMPLETENESS					7	540					1	72		
WINNEBAGO COUNTY/0029.00														
LOAN ORIGINATED	5	420	25	1705	102	6481	3	206			24	1367	10	65
APPROVED, NOT ACCEPTED			1	75	6	369	1	10			1	880		
APP DENIED	1	70	4	179	45	3747	1	62			2	389		
APP WITHDRAWN			4	529	11	793	1	62			2	402		
FILES CLOSED FOR INCOMPLETENESS					2	241								
WINNEBAGO COUNTY/0030.00														
LOAN ORIGINATED	6	549	45	5511	151	15126	9	232			16	1440	4	102
APPROVED, NOT ACCEPTED			4	505	6	441					2	134		
APP DENIED			3	232	35	3378	1	15			1	50		
APP WITHDRAWN	1	49	1	62	19	1899	1	15			2	162		
FILES CLOSED FOR INCOMPLETENESS					4	268					1	60		

AGGREGATE TABLE 1: DISPOSITION OF LOAN APPLICATIONS, BY LOCATION OF PROPERTY AND TYPE OF LOAN, 2003
 ALL LOANS ON PROPERTY LOCATED IN MSA 20/

MSA: 0460 - Appleton-Oshkosh-Neenah, WI

CENSUS TRACT OR COUNTY NAME AND DISPOSITION OF APPLICATION 1/ (STATE/COUNTY/TRACT NUMBER)	Loans on 1-to-4 Family Dwellings										Nonoccupant Loans on 1-to-4 Family Dwellings From Columns A,B,C & D F	Median Income POP as PCT 3/ of MSA Median	
	Home Purchase Loans					Loans on Dwellings For 5 or More Families E							
	Home Purchase Loans		Refinancings C			Home Improvement Loans D		Loans on Dwellings For 5 or More Families E					
	FHA, FSA/RHS & VA A	Conventional B	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	
WIWINNEBAGO COUNTY/0031.00													
LOAN ORIGINATED	9	42	3371	143	13340	18	392	1	616	12	890	4	95
APPROVED, NOT ACCEPTED		1	64	10	920					2	187		
APP DENIED		3	211	48	3596	2	25			3	167		
APP WITHDRAWN		3	343	22	1892	1	5		264				
FILES CLOSED FOR INCOMPLETENESS		1	54	4	389	1	18						
WIWINNEBAGO COUNTY/0032.00													
LOAN ORIGINATED	15	80	8198	202	18906	13	271			12	894	4	98
APPROVED, NOT ACCEPTED		5	357	17	1633	2	51			1	235		
APP DENIED	1	109	6	555	33	2964	7	84					
APP WITHDRAWN	1	79	8	734	34	3113	1	5		1	65		
FILES CLOSED FOR INCOMPLETENESS				4	471								
WIWINNEBAGO COUNTY/0033.00													
LOAN ORIGINATED	11	49	3552	207	15135	20	209	2	1344	20	1423	6	83
APPROVED, NOT ACCEPTED		4	274	17	1255	1	9						
APP DENIED		1	20	77	5862	3	67			1	105		
APP WITHDRAWN		1	122	23	1823	2	54			1	78		
FILES CLOSED FOR INCOMPLETENESS		2	202	2	196								
WIWINNEBAGO COUNTY/0034.00													
LOAN ORIGINATED	19	102	9329	277	20785	24	372			35	2506	5	87
APPROVED, NOT ACCEPTED	1	146	7	490	16	1570	1	25					
APP DENIED	1	89	11	838	84	6506	8	113		3	166		
APP WITHDRAWN		12	1295	46	3496	3	23						
FILES CLOSED FOR INCOMPLETENESS				7	524								
WIWINNEBAGO COUNTY/0035.00													
LOAN ORIGINATED	7	22	1951	124	8986	9	133	3	7756	17	1459	8	75
APPROVED, NOT ACCEPTED				8	694	1	12						
APP DENIED		4	352	23	1652	3	50						
APP WITHDRAWN	1	122	1	23	1495					1	101		
FILES CLOSED FOR INCOMPLETENESS				21	1495								
WIWINNEBAGO COUNTY/0036.00													
LOAN ORIGINATED	9	82	12868	414	58485	30	948			7	511	3	132
APPROVED, NOT ACCEPTED		6	1239	20	2343	1	11			1	84		
APP DENIED		4	401	37	4344	2	59		15				
APP WITHDRAWN	1	79	4	313	28	2916							
FILES CLOSED FOR INCOMPLETENESS				6	753								

CENSUS TRACT OR COUNTY NAME AND DISPOSITION OF APPLICATION 1/ (STATE/COUNTY/TRACT NUMBER)	Home Purchase Loans				Loans on 1-to-4 Family Dwellings				Home Improvement Loans		Loans on Dwellings For 5 or More Families		Nonoccupant Dwellings From Columns A,B,C & D		Median Income of MSA				
	FHA, FSARHS & VA		Conventional		Refinancings		Number		\$000's		Number		\$000's		Number		%		
	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	
WINNEBAGO COUNTY/0037.01																			
LOAN ORIGINATED	9	949	48	4255	263	22866	22	569	22	2219	22	22	22	22	22	22	22	6	96
APPROVED, NOT ACCEPTED					10	820													
APP DENIED			3	326	33	3249	2	31											
APP WITHDRAWN	1	76	3	411	22	1752													
FILES CLOSED FOR INCOMPLETENESS			1	19	4	483													
WINNEBAGO COUNTY/0037.02																			
LOAN ORIGINATED	12	1459	111	13812	660	73585	27	819	27	1690	27	15	15	15	15	15	15	3	111
APPROVED, NOT ACCEPTED			9	1062	34	4220	1	10	1	189	1	2	2	2	2	2	2		
APP DENIED	1	147	3	367	53	6775	4	63	4	63									
APP WITHDRAWN	1	175	8	1141	48	5390	3	204	3	204									
FILES CLOSED FOR INCOMPLETENESS	1	87	2	171	6	496	1	30	1	30									
MSA TOTAL																			
LOAN ORIGINATED	812	85415	6352	730579	27406	2840966	1564	41220	1564	89593	94	89593	1520	140430	1520	140430	1520	140430	1520
APPROVED, NOT ACCEPTED	18	1793	387	46645	1507	160204	89	1822	89	1822	2	1480	86	8678	86	8678	86	8678	86
APP DENIED	43	4260	607	56091	4279	423151	346	7992	346	7992	11	3071	199	19775	199	19775	199	19775	199
APP WITHDRAWN	45	4743	583	67162	2709	267777	114	3282	114	3282	5	1648	129	13329	129	13329	129	13329	129
FILES CLOSED FOR INCOMPLETENESS	7	704	60	6712	439	45346	15	552	15	552	1	680	16	1747	16	1747	16	1747	16
INVALID GEOGRAPHIC IDENTIFIERS 2/																			
LOAN ORIGINATED																			
APPROVED, NOT ACCEPTED																			
APP DENIED																			
APP WITHDRAWN																			
FILES CLOSED FOR INCOMPLETENESS																			

Race, Gender and Income	Applications Received 14/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
MSA: 0460-Appleton--Oshkosh--Neenah, WI												
AMERICAN INDIAN/ALASKAN NATIVE (TOTAL)	1	127	1	127								
MALE	1	127	1	127								
FEMALE												
JOINT (MALE/FEMALE) 7/												
ASIAN/PACIFIC ISLANDER (TOTAL)	8	960	8	960								
MALE												
FEMALE	1	100	1	100								
JOINT (MALE/FEMALE) 7/	7	860	7	860								
BLACK (TOTAL)	3	243	3	243								
MALE	1	64	1	64								
FEMALE	1	71	1	71								
JOINT (MALE/FEMALE) 7/	1	108	1	108								
HISPANIC (TOTAL)	17	1599	12	1174	1	57	1	97	1	79	2	192
MALE	9	829	6	580	1	57					2	192
FEMALE	3	275	3	275								
JOINT (MALE/FEMALE) 7/	5	495	3	319			1	97	1	79		
WHITE (TOTAL)	813	84982	716	75141	17	1736	41	4023	35	3688	4	374
MALE	283	28038	242	23854	11	1006	16	1722	12	1277	2	179
FEMALE	185	12743	124	11916			6	467	5	360		
JOINT (MALE/FEMALE) 7/	395	44181	350	39371	6	730	19	1834	18	2051	2	195
OTHER (TOTAL)	14	1285	13	1190					1	95		
MALE	5	407	4	312					1	95		
FEMALE	3	221	3	221								
JOINT (MALE/FEMALE) 7/	6	657	6	657								
JOINT (WHITE/MINORITY) (TOTAL) 5/	24	2692	21	2343					2	211	1	138
MALE	1	90	1	90								
FEMALE												
JOINT (MALE/FEMALE) 7/	23	2602	20	2253			1	140	6	670	1	138
RACE NOT AVAILABLE (TOTAL) 6/	45	5047	38	4237								
MALE	8	852	8	852								
FEMALE	3	368	3	368								
JOINT (MALE/FEMALE) 7/	23	2534	21	2269					2	265		
INCOME OF APPLICANTS 8/												
LESS THAN 50% OF MSA MEDIAN	171	13949	138	11416	5	394	16	1260	9	631	3	248
50-79% OF MSA MEDIAN	385	38570	351	35217	7	646	17	1683	9	932	1	92
80-99% OF MSA MEDIAN	170	19032	153	16992	4	488	4	500	7	775	2	277
100-119% OF MSA MEDIAN	113	14492	101	12781	1	119	4	567	7	1025		
120% OR MORE OF MSA MEDIAN	64	8592	59	8024	1	146			4	422		
INCOME NOT AVAILABLE 6/	22	2280	10	985			2	250	9	958	1	87

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Race, Gender and Income 4/13/	Applications Received 14/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
AMERICAN IND/ALASKAN NATIVE (TOTAL)	14	1151	9	785	2	205	3	161				
MALE	6	473	5	449			1	24				
FEMALE	6	564	3	244	2	205	1	115				
JOINT (MALE/FEMALE) 7/	2	114	1	92			1	22				
ASIAN/PACIFIC ISLANDER (TOTAL)	82	8788	67	7130	6	767	5	488	4	403		
MALE	15	1709	12	1406	1	113	1	91	1	99		
FEMALE	14	1353	13	1202	1	151						
JOINT (MALE/FEMALE) 7/	53	5726	42	4522	4	503	4	397	3	304		
BLACK (TOTAL)	10	1188	5	686	1	185	4	317				
MALE	6	749	3	361	1	185	2	203				
FEMALE	3	254	1	140			2	114				
JOINT (MALE/FEMALE) 7/	1	185	1	185								
HISPANIC (TOTAL)	88	6948	60	5244	8	717	16	699	1	75	3	213
MALE	41	3217	27	2424	4	329	8	339			2	125
FEMALE	12	1024	11	948	1	76						
JOINT (MALE/FEMALE) 7/	35	2707	22	1872	3	312	8	360	1	75	1	88
WHITE (TOTAL)	7071	802598	5792	665507	325	38928	463	44528	446	43933	45	4702
MALE	1715	163883	1332	128355	92	9187	150	12622	133	13077	8	642
FEMALE	1110	98494	903	80784	49	4864	76	6024	70	5762	12	1060
JOINT (MALE/FEMALE) 7/	4242	539741	3555	456104	184	24877	237	25882	243	30094	23	2784
OTHER (TOTAL)	37	4637	28	3455	5	696	1	85	3	401		
MALE	7	650	5	436			1	85	1	129		
FEMALE	1	312			1	312						
JOINT (MALE/FEMALE) 7/	26	3466	21	2916	4	384			1	166		
JOINT (WHITE/OTHER) (TOTAL) 5/	101	14111	75	10269	8	2080	7	527	9	953	2	282
MALE	5	409	2	175			2	160	1	74		
FEMALE	1	125			1	125						
JOINT (MALE/FEMALE) 7/	95	13577	73	10094	7	1955	5	367	8	879	2	282
RACE NOT AVAILABLE (TOTAL) 6/	586	67768	316	37503	32	3067	108	9286	120	16397	10	1515
MALE	151	16498	45	4939	11	1024	38	3737	57	6798		
FEMALE	37	3063	21	1959			9	527	6	425	1	152
JOINT (MALE/FEMALE) 7/	136	17945	87	11596	7	843	15	1317	27	4189		
INCOME OF APPLICANTS 8/												
LESS THAN 50% OF MSA MEDIAN	887	60698	613	42380	48	3378	134	8222	84	6143	8	575
50-79% OF MSA MEDIAN	2052	183767	1602	145485	92	8067	186	14646	154	13929	18	1640
80-99% OF MSA MEDIAN	1291	134629	1071	111428	62	6631	78	8144	72	7682	8	744
100-119% OF MSA MEDIAN	1098	133265	898	107847	49	6153	58	6419	84	11768	9	1078
120% OR MORE OF MSA MEDIAN	2324	355147	1971	300717	124	21397	100	13451	115	17193	14	2389
INCOME NOT AVAILABLE 6/	337	39683	197	22722	12	1019	51	5209	74	10447	3	286

Report Date:

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Race, Gender and Income 4/13/	Applications Received 14/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
AMERICAN IND/ALASKAN NATIVE (TOTAL)	66	6471	46	4410	17	1641	44	4530	28	2653	1	139
MALE	18	1255	14	1040	1	45	4	616	6	514	1	139
FEMALE	23	2455	15	1275	3	318	7	431	6	641		
JOINT (MALE/FEMALE) 7/	25	2761	17	2095	13	1278	33	3483	16	1498		
ASIAN/PACIFIC ISLANDER (TOTAL)	307	31888	217	22925	9	1309	14	1179	7	416	1	70
MALE	30	3475	18	2161	1	45	4	616	6	514		
FEMALE	35	3356	19	1966	3	318	7	431	6	641		
JOINT (MALE/FEMALE) 7/	241	24940	179	18681	13	1278	33	3483	16	1498		
BLACK (TOTAL)	60	6245	29	3271	9	1309	14	1179	7	416	1	70
MALE	16	1758	7	693	2	455	3	381	4	229		
FEMALE	8	522	3	235			4	272	1	15		
JOINT (MALE/FEMALE) 7/	31	3248	18	2151	4	353	6	502	2	172	1	70
HISPANIC (TOTAL)	162	14984	110	10592	7	647	29	2210	13	1224	3	311
MALE	46	3961	31	2793	1	59	7	487	5	421	2	201
FEMALE	23	1944	19	1527	1	146	1	96	2	175		
JOINT (MALE/FEMALE) 7/	93	9079	60	6272	5	442	21	1627	6	628	1	110
WHITE (TOTAL)	32143	3313784	25620	2649382	1282	136954	2990	298494	1910	194453	341	35511
MALE	4934	470044	3416	317996	251	24404	742	72818	448	47131	77	7695
FEMALE	3639	292013	2770	220214	161	14275	416	33799	254	20547	38	3178
JOINT (MALE/FEMALE) 7/	23545	2549212	19425	2109197	866	97935	1825	191304	1206	126506	223	24270
OTHER (TOTAL)	320	33911	116	13137	14	1651	140	13872	39	3841	11	1410
MALE	73	6910	20	1970	4	391	36	3259	11	1113	2	177
FEMALE	39	3694	13	1368	1	50	14	1190	10	999	1	87
JOINT (MALE/FEMALE) 7/	185	20632	71	8286	6	845	87	9162	17	1646	4	693
JOINT (WHITEMINORITY) (TOTAL) 5/	394	41572	272	28833	15	1396	74	8039	23	2432	10	812
MALE	10	852	5	334	1	159	3	334			1	25
FEMALE	5	607	2	215	1	148	1	92			1	152
JOINT (MALE/FEMALE) 7/	379	40113	265	28284	13	1089	70	7673	23	2432	8	635
RACE NOT AVAILABLE (TOTAL) 6/	2888	288589	996	109416	163	16606	978	93465	682	62236	69	6866
MALE	342	32856	106	9873	18	1897	138	13003	70	7019	10	1064
FEMALE	180	16599	54	5382	5	655	63	5365	52	4710	6	487
JOINT (MALE/FEMALE) 7/	881	95683	311	36115	47	5863	304	33222	202	19028	17	1455
INCOME OF APPLICANTS 8/												
LESS THAN 50% OF MSA MEDIAN	2921	202288	1776	114262	119	8657	666	49863	313	25457	47	4049
50-79% OF MSA MEDIAN	7969	658486	5552	451115	320	28533	1310	111583	672	56686	115	10569
80-99% OF MSA MEDIAN	5807	530364	4309	389926	254	24378	716	68149	451	40481	77	7430
100-119% OF MSA MEDIAN	5326	529326	4113	408973	214	21829	561	56823	377	35904	61	5797
120% OR MORE OF MSA MEDIAN	11432	1503355	9346	1224750	435	59283	874	121439	662	83027	115	14856
INCOME NOT AVAILABLE 6/	2885	313625	2310	251940	165	17524	152	15294	234	26222	24	2645

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Race, Gender and Income 4/13/	Applications Received 14/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
AMERICAN IND/ALASKAN NATIVE (TOTAL)	12	211	6	123			4	45	2	43		
MALE	3	58	2	55			1	3				
FEMALE	7	132	4	68			1	21	2	43		
JOINT (MALE/FEMALE) 7/	2	21					2	21				
ASIAN/PACIFIC ISLANDER (TOTAL)	20	500	11	292			8	138	1	70		
MALE	5	103	2	13			2	20	1	70		
FEMALE	3	51	1	14			2	37				
JOINT (MALE/FEMALE) 7/	12	346	8	265			4	81				
BLACK (TOTAL)	7	190	2	24			4	86	1	80		
MALE	2	56	1	20			1	36				
FEMALE	1	15					1	15				
JOINT (MALE/FEMALE) 7/	4	119	1	4			2	35	1	80		
HISPANIC (TOTAL)	18	385	9	233			9	152				
MALE	6	78	4	34			2	44				
FEMALE	1	20					1	20				
JOINT (MALE/FEMALE) 7/	11	287	5	199			6	88				
WHITE (TOTAL)	1863	48097	1463	38826	78	1578	243	5664	71	1634	8	395
MALE	312	7109	221	4559	16	331	61	1751	12	371	2	97
FEMALE	283	5636	199	4060	11	150	58	1039	14	327	1	60
JOINT (MALE/FEMALE) 7/	1266	35327	1043	30207	50	1094	123	2852	45	936	5	238
OTHER (TOTAL)	10	267	2	10			6	211	2	46		
MALE												
FEMALE	4	150	1	8			3	142				
JOINT (MALE/FEMALE) 7/	6	117	1	2			3	69	2	46		
JOINT (WHITE/MINORITY) (TOTAL) 5/	15	355	10	215			5	140				
MALE	2	120	1	30			1	90				
FEMALE												
JOINT (MALE/FEMALE) 7/	13	235	9	185			4	50				
RACE NOT AVAILABLE (TOTAL) 6/	183	4843	61	1497	11	244	67	1556	37	1389	7	157
MALE	20	349	9	160	2	30	6	91	3	68		
FEMALE	17	291	5	140	3	31	7	80	2	40		
JOINT (MALE/FEMALE) 7/	51	1342	14	290	4	155	22	584	9	271	2	42
INCOME OF APPLICANTS 8/												
LESS THAN 50% OF MSA MEDIAN	239	4284	144	3055	14	138	65	840	14	189	2	62
50-79% OF MSA MEDIAN	547	11233	386	7867	21	286	105	2164	30	734	5	182
80-99% OF MSA MEDIAN	392	9465	287	6893	19	270	63	1837	20	394	3	71
100-119% OF MSA MEDIAN	332	8289	262	6450	9	209	45	1043	14	397	2	190
120% OR MORE OF MSA MEDIAN	583	20026	463	16009	25	889	63	1991	29	1090	3	47
INCOME NOT AVAILABLE 6/	35	1551	22	946	1	30	5	117	7	458		

Income and Race 4/ 5/	Applications Received 14/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
LESS THAN 50% OF MSA MEDIAN												
AMERICAN INDIAN/ALASKAN NATIVE												
ASIAN/PACIFIC ISLANDER												
BLACK	2	135	2	135								
HISPANIC	8	715	4	347			1	97	1	79	2	192
WHITE	153	12472	124	10307	5	394	15	1163	8	552	1	56
OTHER	5	370	5	370								
JOINT (WHITE/MINORITY) 5/	1	82	1	82								
RACE NOT AVAILABLE 6/	2	175	2	175								
50-79% OF MSA MEDIAN												
AMERICAN INDIAN/ALASKAN NATIVE	1	127	1	127								
ASIAN/PACIFIC ISLANDER	6	671	6	671								
BLACK												
HISPANIC	7	634	6	577	1	57						
WHITE	337	33616	305	30446	6	589	17	1683	8	806	1	92
OTHER	5	477	5	477								
JOINT (WHITE/MINORITY) 5/	10	1009	10	1009								
RACE NOT AVAILABLE 6/	19	2036	18	1910					1	126		
80-99% OF MSA MEDIAN												
AMERICAN INDIAN/ALASKAN NATIVE	2	289	2	289								
ASIAN/PACIFIC ISLANDER												
BLACK												
HISPANIC												
WHITE	147	16241	132	14459	4	483	4	500	6	655	1	139
OTHER	1	112	1	112								
JOINT (WHITE/MINORITY) 5/	9	1031	7	773					1	120	1	138
RACE NOT AVAILABLE 6/	11	1359	11	1359								
100-119% OF MSA MEDIAN												
AMERICAN INDIAN/ALASKAN NATIVE												
ASIAN/PACIFIC ISLANDER												
BLACK	1	108	1	108								
HISPANIC	2	250	2	250								
WHITE	101	13021	91	11589	1	119	3	427	6	886		
OTHER												
JOINT (WHITE/MINORITY) 5/	1	165	1	165								
RACE NOT AVAILABLE 6/	8	948	6	669			1	140	1	139		
120% OR MORE OF MSA MEDIAN												
AMERICAN INDIAN/ALASKAN NATIVE												
ASIAN/PACIFIC ISLANDER												
BLACK												
HISPANIC												
WHITE	58	7843	55	7461	1	146			2	236		
OTHER	2	220	1	125					1	95		
JOINT (WHITE/MINORITY) 5/	3	405	2	314					1	91		
RACE NOT AVAILABLE 6/	1	124	1	124								

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Income and Race 4/8/	Applications Received 14/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
LESS THAN 50% OF MSA MEDIAN												
AMERICAN IND/ALASKAN NATIVE	3	189	2	165			1	24				
ASIAN/PACIFIC ISLANDER	12	876	10	688	1	97	1	91				
BLACK	2	130					2	130				
HISPANIC	25	1284	13	788	2	97	9	311			1	88
WHITE	791	54914	566	39183	43	3131	101	6677	74	5436	7	487
OTHER	4	277	4	277								
JOINT (WHITE/MINORITY) 5/	5	304	2	160			3	144				
RACE NOT AVAILABLE 6/	45	2724	16	1119	2	53	17	845	10	707		
50-79% OF MSA MEDIAN												
AMERICAN IND/ALASKAN NATIVE	5	376	4	313	1	63						
ASIAN/PACIFIC ISLANDER	24	2523	20	2089	1	151	2	154	1	129		
BLACK	1	130					1	130				
HISPANIC	42	3346	31	2516	4	331	4	299	1	75	2	125
WHITE	1819	163776	1451	132089	83	7344	150	12083	120	10847	15	1413
OTHER	8	647	7	562			1	85				
JOINT (WHITE/MINORITY) 5/	24	2173	19	1746			1	100	4	327		
RACE NOT AVAILABLE 6/	129	10796	70	6170	3	178	27	1795	28	2551	1	102
80-99% OF MSA MEDIAN												
AMERICAN IND/ALASKAN NATIVE	2	221	1	79	1	142						
ASIAN/PACIFIC ISLANDER	17	1503	13	1172	2	156			2	175		
BLACK	1	94	1	94								
HISPANIC	11	759	9	697			2	62				
WHITE	1184	124017	995	104002	53	5706	69	7473	61	6407	6	429
OTHER	5	601	3	388	1	84			1	129		
JOINT (WHITE/MINORITY) 5/	16	1726	13	1313	2	258					1	155
RACE NOT AVAILABLE 6/	55	5708	36	3683	3	285	7	609	8	971	1	160
100-119% OF MSA MEDIAN												
AMERICAN IND/ALASKAN NATIVE	1	136	1	136								
ASIAN/PACIFIC ISLANDER	7	984	5	741			2	243				
BLACK	4	493	2	251	1	185	1	57				
HISPANIC	3	460	2	262	1	198						
WHITE	1002	120541	844	101074	40	5194	46	5175	65	8177	7	921
OTHER	6	499	3	283	2	110			1	106		
JOINT (WHITE/MINORITY) 5/	16	2094	12	1681	2	233			2	180		
RACE NOT AVAILABLE 6/	59	8058	29	3419	3	233	9	944	16	3305	2	157
120% OR MORE OF MSA MEDIAN												
AMERICAN IND/ALASKAN NATIVE	2	114	1	92			1	22				
ASIAN/PACIFIC ISLANDER	19	2586	16	2124	2	363			1	99		
BLACK	1	156	1	156								
HISPANIC	7	1099	5	981	1	91	1	27				
WHITE	2107	320067	1811	274666	100	17034	84	11758	102	15157	10	1452
OTHER	14	2613	11	1945	2	502			1	166		
JOINT (WHITE/MINORITY) 5/	38	7646	28	5275	4	1589	3	283	2	372	1	127
RACE NOT AVAILABLE 6/	136	20866	98	15478	15	1818	11	1361	9	1399	3	810

Income and Race 4/ 5/	Applications Received 14/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
MSA: 0460-Appleton-Oshkosh-Neenah, WI												
LESS THAN 50% OF MSA MEDIAN												
AMERICAN INDIAN/ALASKAN NATIVE	14	946	9	672	2	232	1	26	3	197	1	51
ASIAN/PACIFIC ISLANDER	39	2968	23	1741	2	232	10	688	4	307		
BLACK	3	171					2	105	1	66		
HISPANIC	31	2141	18	1251			9	584	3	216	1	90
WHITE	2431	164483	1643	104609	98	7097	455	33295	199	16261	36	3221
OTHER	36	2683	12	844	2	139	19	1432	3	268		
JOINT (WHITE/MINORITY) 5/	21	1675	12	942	1	61	7	573	1	99		
RACE NOT AVAILABLE 6/	346	27221	59	4203	16	1128	163	13160	99	8043	9	687
50-79% OF MSA MEDIAN												
AMERICAN INDIAN/ALASKAN NATIVE	11	946	9	817			1	63	1	66		
ASIAN/PACIFIC ISLANDER	71	5442	48	3490	2	120	12	1011	9	821		
BLACK	17	1309	7	654	1	85	5	351	3	149	1	70
HISPANIC	56	4558	37	2960	2	200	11	889	5	398	1	111
WHITE	6940	574054	5205	422878	270	24107	998	80999	438	37740	89	8330
OTHER	77	6908	23	2041	2	201	39	3611	11	883	2	172
JOINT (WHITE/MINORITY) 5/	77	6793	48	4014	2	185	19	1925	5	348	3	321
RACE NOT AVAILABLE 6/	720	58476	175	14261	41	3635	285	22734	200	16281	19	1565
80-99% OF MSA MEDIAN												
AMERICAN INDIAN/ALASKAN NATIVE	15	1476	12	1119			2	263	1	94		
ASIAN/PACIFIC ISLANDER	65	5455	47	4156	4	224	6	391	8	684		
BLACK	10	1156	2	98	4	701	3	262	1	95		
HISPANIC	26	2221	20	1609	3	295	2	207			1	110
WHITE	5153	469320	4048	364444	213	20224	501	48338	334	30599	57	5715
OTHER	59	6381	22	2503	1	78	24	2504	10	1123	2	173
JOINT (WHITE/MINORITY) 5/	51	4927	30	3044	3	272	11	997	5	528	2	86
RACE NOT AVAILABLE 6/	428	39428	128	12953	26	2584	167	15167	92	7358	15	1346
100-119% OF MSA MEDIAN												
AMERICAN INDIAN/ALASKAN NATIVE	6	418	3	292			3	126				
ASIAN/PACIFIC ISLANDER	32	3456	21	2152	3	299	6	749	2	256		
BLACK	9	1156	6	706	1	173	2	277				
HISPANIC	11	863	5	393	1	84	4	277	1	109		
WHITE	4817	480345	3905	388448	185	18958	391	40994	284	27233	52	4712
OTHER	40	4104	10	1082	1	112	23	2373	6	537		
JOINT (WHITE/MINORITY) 5/	60	4957	42	3740	1	148	13	870	3	175	1	24
RACE NOT AVAILABLE 6/	351	34027	121	12160	22	2055	119	11157	81	7594	8	1061
120% OR MORE OF MSA MEDIAN												
AMERICAN INDIAN/ALASKAN NATIVE	14	2116	10	1211			1	650	1	79	2	176
ASIAN/PACIFIC ISLANDER	77	12290	61	9626	3	516	9	1660	3	349	1	139
BLACK	17	1797	10	1157	3	350	2	184	2	106		
HISPANIC	23	3819	18	3262			2	123	3	434		
WHITE	10327	1361682	8789	1150380	378	51893	592	85313	479	62520	89	11576
OTHER	97	12473	39	5447	7	979	35	3852	9	1030	7	1085
JOINT (WHITE/MINORITY) 5/	132	17793	96	12388	5	374	20	3482	9	1282	2	267
RACE NOT AVAILABLE 6/	745	91385	323	41279	39	5171	213	26075	156	17227	14	1633

MSA: 0460-Appleton-Oshkosh-Neenah, WI

Income and Race 4/8/	Applications Received 14/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
LESS THAN 50% OF MSA MEDIAN												
AMERICAN IND/ALASKAN NATIVE	2	28	1	7			1	21				
ASIAN/PACIFIC ISLANDER	5	100	2	59			3	41				
BLACK	4	29	1	3			3	26				
HISPANIC	212	3969	136	2936	13	127	51	704	10	140	2	62
WHITE	1	2	1	2								
OTHER	2	32	1	30			1	2				
JOINT (WHITE/MINORITY) 5/	13	124	2	18	1	11	6	46	4	49		
RACE NOT AVAILABLE 6/												
50-79% OF MSA MEDIAN												
AMERICAN IND/ALASKAN NATIVE	4	55	2	32			1	3	1	20		
ASIAN/PACIFIC ISLANDER	4	44	2	17			2	27				
BLACK	2	35	1	20			1	15				
HISPANIC	6	75	5	51			1	24				
WHITE	474	9571	361	7473	18	248	76	1405	18	350	1	95
OTHER	4	42	1	8			2	14	1	20		
JOINT (WHITE/MINORITY) 5/	4	109	2	14			2	95				
RACE NOT AVAILABLE 6/	49	1302	12	252	3	38	20	581	10	344	4	87
80-99% OF MSA MEDIAN												
AMERICAN IND/ALASKAN NATIVE	4	93	2	55			1	15	1	23		
ASIAN/PACIFIC ISLANDER	6	110	4	56			2	54				
BLACK	1	36					1	36				
HISPANIC	6	156	2	65			4	91				
WHITE	329	8208	262	6420	18	230	39	1383	9	152	1	23
OTHER	1	26							1	26		
JOINT (WHITE/MINORITY) 5/												
RACE NOT AVAILABLE 6/	45	836	17	297	1	40	16	258	9	193	2	48
100-119% OF MSA MEDIAN												
AMERICAN IND/ALASKAN NATIVE	2	35	1	29			1	6				
ASIAN/PACIFIC ISLANDER	2	27	1	11			1	16				
BLACK	1	80							1	80		
HISPANIC	1	11					1	11				
WHITE	300	7375	252	6224	7	138	30	613	9	210	2	190
OTHER	2	138					2	138				
JOINT (WHITE/MINORITY) 5/												
RACE NOT AVAILABLE 6/	24	623	8	186	2	71	10	259	4	107		
120% OR MORE OF MSA MEDIAN												
AMERICAN IND/ALASKAN NATIVE	3	219	2	149					1	70		
ASIAN/PACIFIC ISLANDER	3	39	1	4			2	35				
BLACK	1	114	1	114								
HISPANIC	524	17971	433	14921	21	805	45	1536	23	684	2	25
WHITE	2	59					2	59				
OTHER	9	214	7	171			2	43				
JOINT (WHITE/MINORITY) 5/	41	1410	19	650	4	84	12	318	5	336	1	22
RACE NOT AVAILABLE 6/												

AGGREGATE TABLE 7-1: DISPOSITION OF APPLICATIONS FOR FHA, FSA/RHS, AND VA HOME-PURCHASE LOANS, 1 to 4 FAMILY HOMES, BY CHARACTERISTICS OF CENSUS TRACT IN WHICH PROPERTY IS LOCATED, 2003

MSA: 0460-Appleton-Oshkosh-Neenah, WI

Type of Census Tract 9/	Applications Received 14/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
RACIAL COMPOSITION 10/												
LESS THAN 10% MINORITY	787	82667	696	73397	14	1347	34	3469	38	3942	5	512
10-19% MINORITY	125	12732	104	10611	3	337	9	791	7	801	2	192
20-49% MINORITY	13	1516	12	1407	1	109						
50-79% MINORITY												
80-100% MINORITY												
INCOME CHARACTERISTICS 11/												
LOW INCOME												
LESS THAN 10% MINORITY	126	11833	104	9862	1	124	10	786	9	866	2	195
10-19% MINORITY	742	78148	661	69834	16	1517	29	3013	31	3275	5	509
20-49% MINORITY	57	8934	47	5719	1	152	4	461	5	602		
50-79% MINORITY												
80-100% MINORITY												
MODERATE INCOME												
LESS THAN 10% MINORITY	79	7287	67	6263	1	124	4	288	6	541	2	195
10-19% MINORITY	47	4546	37	3599			6	498	3	325		
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
MIDDLE INCOME												
LESS THAN 10% MINORITY	651	68446	582	61415	13	1195	26	2720	27	2799	3	317
10-19% MINORITY	78	8186	67	7012	2	213	3	283	4	476	2	192
20-49% MINORITY	13	1516	12	1407	1	109						
50-79% MINORITY												
80-100% MINORITY												
UPPER INCOME												
LESS THAN 10% MINORITY	57	6934	47	5719	1	152	4	461	5	602		
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
SMALL COUNTY												
ALL OTHER TRACTS 15/												

AGGREGATE TABLE 7-2: DISPOSITION OF APPLICATIONS FOR CONVENTIONAL HOME-PURCHASE LOANS, 1 to 4 FAMILY HOMES, BY CHARACTERISTICS OF CENSUS TRACT IN WHICH PROPERTY IS LOCATED, 2003

MSA: 0460-Appleton-Oshkosh-Neenah, WI

Type of Census Tract 9/	Applications Received 14/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
RACIAL COMPOSITION 10/												
LESS THAN 10% MINORITY	7078	821207	5649	662900	341	42483	525	49268	509	60221	54	6335
10-19% MINORITY	790	69900	614	54853	40	3541	70	5629	60	5500	6	377
20-49% MINORITY	121	16082	89	12826	6	621	12	1194	14	1441		
50-79% MINORITY												
80-100% MINORITY												
INCOME CHARACTERISTICS 11/												
LOW INCOME	652	54274	493	40030	30	2514	69	5669	52	5313	8	748
MODERATE INCOME	6187	683188	4878	545395	299	34550	494	44484	474	53899	42	4860
MIDDLE INCOME	1150	169727	981	145154	58	9581	44	5938	57	7950	10	1104
UPPER INCOME												
INCOME & RACIAL COMPOSITION 10/, 11/												
LOW INCOME												
LESS THAN 10% MINORITY												
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
MODERATE INCOME												
LESS THAN 10% MINORITY	399	34263	304	25190	16	1296	40	3529	35	3844	4	404
10-19% MINORITY	253	20011	189	14840	14	1218	29	2140	17	1469	4	344
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
MIDDLE INCOME												
LESS THAN 10% MINORITY	5529	617217	4364	492556	267	31606	441	39801	417	48427	40	4827
10-19% MINORITY	537	48889	425	40013	26	2323	41	3489	43	4031	2	33
20-49% MINORITY	121	16082	89	12826	6	621	12	1194	14	1441		
50-79% MINORITY												
80-100% MINORITY												
UPPER INCOME												
LESS THAN 10% MINORITY	1150	169727	981	145154	58	9581	44	5938	57	7950	10	1104
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
SMALL COUNTY												
ALL OTHER TRACTS 15/												

MSA: 0460-Appleton-Oshkosh-Neenah, WI

Type of Census Tract 9/	Applications Received 14/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
RACIAL COMPOSITION 10/												
LESS THAN 10% MINORITY	32581	3396250	24721	2600174	1335	143342	3727	374553	2414	240744	364	37437
10-19% MINORITY	3225	277324	2280	192562	151	14483	466	39724	258	23165	70	7390
20-49% MINORITY	554	63870	405	48230	21	2379	86	8874	37	3868	5	519
50-79% MINORITY												
80-100% MINORITY												
INCOME CHARACTERISTICS 11/												
LOW INCOME												
MODERATE INCOME	2686	205831	1726	127554	108	8928	490	39094	295	23891	67	6364
MIDDLE INCOME	29118	2928724	21911	2207337	1223	128737	3470	343156	2175	214874	339	34620
UPPER INCOME	4536	602389	3769	506075	176	22539	319	40901	239	29012	33	4362
INCOME & RACIAL COMPOSITION 10/ 11/												
LOW INCOME												
LESS THAN 10% MINORITY	1750	131556	1116	81334	63	4886	336	26798	202	15849	33	2689
10-19% MINORITY	936	74275	610	46220	45	4042	154	12296	93	8042	34	3675
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
MODERATE INCOME												
LESS THAN 10% MINORITY	26275	2661805	19636	2012765	1096	115917	3072	306854	1973	195883	298	30386
10-19% MINORITY	2289	203049	1670	146342	106	10441	312	27428	165	15123	36	3715
20-49% MINORITY	554	63870	405	48230	21	2379	86	8874	37	3868	5	519
50-79% MINORITY												
80-100% MINORITY												
MIDDLE INCOME												
LESS THAN 10% MINORITY	4536	602889	3769	506075	176	22539	319	40901	239	29012	33	4362
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
UPPER INCOME												
LESS THAN 10% MINORITY												
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
SMALL COUNTY												
ALL OTHER TRACTS 15/												

AGGREGATE TABLE 7-4: DISPOSITION OF APPLICATIONS FOR HOME IMPROVEMENT LOANS 1 to 4 FAMILY HOMES, BY CHARACTERISTICS OF CENSUS TRACT IN WHICH PROPERTY IS LOCATED, 2003

MSA: 0460-Appleton-Oshkosh-Neenah, WI

Type of Census Tract 9/	Applications Received 14/		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
RACIAL COMPOSITION 10/												
LESS THAN 10% MINORITY	1859	48710	1387	36932	78	1665	284	7129	98	2531	12	453
10-19% MINORITY	232	4932	159	3771	11	157	49	586	10	319	3	99
20-49% MINORITY	37	1206	18	517			13	277	6	412		
50-79% MINORITY												
80-100% MINORITY												
INCOME CHARACTERISTICS 11/												
LOW INCOME	176	4047	110	2775	8	83	42	716	15	413	1	60
MODERATE INCOME	1742	44643	1282	33195	70	1472	285	6902	92	2605	13	469
MIDDLE INCOME	210	6158	172	5250	11	267	19	374	7	244	1	23
UPPER INCOME												
INCOME & RACIAL COMPOSITION 10/, 11/												
LOW INCOME	109	2509	62	1563	6	63	27	520	14	363		60
LESS THAN 10% MINORITY	67	1538	48	1212	2	20	15	196	1	50	1	80
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
MODERATE INCOME	1540	40043	1153	30119	61	1335	238	6235	77	1924	11	430
LESS THAN 10% MINORITY	165	3394	111	2559	9	137	34	390	9	269	2	39
10-19% MINORITY	37	1206	18	517			13	277	6	412		
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
UPPER INCOME	210	6158	172	5250	11	267	19	374	7	244	1	23
LESS THAN 10% MINORITY												
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
SMALL COUNTY												
ALL OTHER TRACTS 15/												

AGGREGATE TABLE 8-1: REASONS FOR DENIAL OF APPLICATIONS FOR FHA, FSA/RHS, AND VA HOME-PURCHASE LOANS, 1 to 4 FAMILY HOMES, BY RACE, GENDER AND INCOME OF APPLICANT, 2003

MSA: 0460-Appleton-Oshkosh-Neenah, WI

Applicant Characteristics	Debt-to-Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit Appl. Incomplete		Mortgage Insurance Denied		Other		Total /16		
	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	
RACE 4/																					
AMERICAN INDIAN/ALASKAN NATIVE																					
ASIAN/PACIFIC ISLANDER																					
BLACK																					
HISPANIC	1	50	1	50																	2 100
WHITE	14	28	3	6	16	32	1	2	3	6	3	6	6	12							50 100
OTHER																					
JOINT (WHITE/MINORITY) 5/																					
RACE NOT AVAILABLE 6/																					1 100
GENDER																					
MALE	7	35	1	5	6	30			3	15			1	5							2 10
FEMALE	2	25	1	13	2	25	1	13			2	25									8 100
JOINT (MALE/FEMALE) 7/	6	25	2	8	8	33					1	4	5	21							24 100
GENDER NOT AVAILABLE 6/																					1 100
INCOME 8/																					
LESS THAN 50% OF MSA MEDIAN	8	36	3	14	5	23	1	5	1	5	1	5	2	9							22 100
50-79% OF MSA MEDIAN	6	30	1	5	6	30			1	5	2	10	2	10							20 100
80-99% OF MSA MEDIAN	1	25			2	50							1	25							4 100
100-119% OF MSA MEDIAN					3	75							1	25							4 100
120% OR MORE OF MSA MEDIAN																					
INCOME NOT AVAILABLE 6/					1	33			1	33											3 100

AGGREGATE TABLE 3-2: REASONS FOR DENIAL OF APPLICATIONS FOR CONVENTIONAL HOME-PURCHASE LOANS, 1 to 4 FAMILY HOMES, BY RACE, GENDER AND INCOME OF APPLICANT, 2003

MSA: 0460-Appleton--Oshkosh--Neenah, WI

Applicant Characteristics	Debt-to-Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit Appl. Incomplete		Mortgage Insurance Denied		Other		Total /16		
	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	
RACE 4/																					
AMERICAN IND/ALASKAN NATIVE																		1	100	1	100
ASIAN/PACIFIC ISLANDER	1	25			1	25		1	25									1	25	1	25
BLACK								1	50									1	50	1	50
HISPANIC	1	7			7	47		5	33									2	13	2	13
WHITE	86	18	20	4	158	33	53	11	19	4	29	6	28	6				86	18	86	18
OTHER																		1	100	1	100
JOINT (WHITE/MINORITY) 5/	1	13			1	13												6	75	6	75
RACE NOT AVAILABLE 6/	16	18	3	3	40	45	7	8	1	1	2	2	3	3				17	19	17	19
GENDER																					
MALE	31	16	5	3	77	41	14	7	7	4	7	4	10	5				37	20	37	20
FEMALE	18	22	5	6	27	33	10	12	4	5	4	5	4	5				10	12	10	12
JOINT (MALE/FEMALE) 7/	52	18	10	4	86	30	86	13	8	3	18	6	14	5				61	21	61	21
GENDER NOT AVAILABLE 6/	4	9	3	7	17	39	7	16	1	2	2	5	3	7				7	16	7	16
INCOME 8/																					
LESS THAN 50% OF MSA MEDIAN	31	25	6	5	51	41	9	7	5	4	2	2	2	2				18	15	18	15
50-79% OF MSA MEDIAN	30	15	10	5	70	35	20	10	7	4	12	6	8	4				41	21	41	21
80-99% OF MSA MEDIAN	9	13	2	3	25	36	10	14	3	4	3	4	5	7				12	17	12	17
100-119% OF MSA MEDIAN	10	19	1	2	14	26	6	11	3	6	5	9	2	4				12	23	12	23
120% OR MORE OF MSA MEDIAN	12	11	3	3	27	26	20	19	2	2	8	8	14	13				19	18	19	18
INCOME NOT AVAILABLE 6/	13	26	1	2	20	40	2	4			1	2						13	26	13	26

AGGREGATE TABLE 8-3: REASONS FOR DENIAL OF APPLICATIONS TO REFINANCE LOANS ON 1 to 4 FAMILY HOMES, BY RACE, GENDER AND INCOME OF APPLICANT, 2003

MSA: 0460-Appleton-Oshkosh-Neenah, WI

Applicant Characteristics	Debt-to-Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit Appl. Incomplete		Mortgage Insurance Denied		Other		Total/16				
	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	
RACE 4/																							
AMERICAN INDIAN/ALASKAN NATIVE					4	36	5	45						1	9			1	9			11	100
ASIAN/PACIFIC ISLANDER	11	24			5	11	6	13			5	11		12	26			7	15			48	100
BLACK	3	23			2	15					1	8		2	15			5	38			13	100
HISPANIC	6	18			10	30	5	15			1	3		4	12			7	21			33	100
WHITE	411	14	26	1	731	25	381	13	27	1	188	6	546	18	6			660	22			2976	100
OTHER	3	2			25	18	8	6					41	29				62	45			139	100
JOINT (WHITE/MINORITY) 5/	5	7			22	31	11	15			2	3		13	18			18	25			71	100
RACE NOT AVAILABLE 6/	48	6	9	1	150	19	58	7	2		10	1	211	26	1			310	39			799	100
GENDER																							
MALE	116	13	9	1	185	20	112	12	6	1	37	4	196	22	3			246	27			910	100
FEMALE	81	16	6	1	126	24	54	10	7	1	27	5	88	17				128	25			517	100
JOINT (MALE/FEMALE) 7/	256	11	14	1	535	24	276	12	15	1	135	6	501	22	3			535	24			2270	100
GENDER NOT AVAILABLE 6/	34	9	6	2	103	26	32	8	1		8	2	45	12	1			161	41			391	100
INCOME 8/																							
LESS THAN 50% OF MSA MEDIAN	143	22	6	1	164	26	52	8	5	1	16	2	65	10	1			190	30			642	100
50-79% OF MSA MEDIAN	175	14	14	1	302	24	132	10	7	1	69	5	235	18	5			334	26			1273	100
80-99% OF MSA MEDIAN	54	8	6	1	150	22	79	12	4	1	29	4	156	23				189	28			667	100
100-119% OF MSA MEDIAN	50	9	3	1	125	23	82	15	3	1	31	6	112	21	1			125	23			532	100
120% OR MORE OF MSA MEDIAN	59	7	5	1	144	17	116	14	7	1	54	6	242	29				218	26			845	100
INCOME NOT AVAILABLE 6/	6	5	1	1	64	50	13	10	3	2	8	6	20	16				14	11			129	100

AGGREGATE TABLE 8-4: REASONS FOR DENIAL OF APPLICATIONS FOR HOME IMPROVEMENT LOANS 1 TO 4 FAMILY HOMES, BY RACE, GENDER AND INCOME OF APPLICANT, 2003

MSA: 0460-Appleton-Oshkosh-Neenah, WI

Applicant Characteristics	Debt-to-Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit Appl. Incomplete		Mortgage Insurance Denied		Other		Total /16		
	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	
RACE 4/																					
AMERICAN INDIAN/ALASKAN NATIVE					2	67											1	33		3	100
ASIAN/PACIFIC ISLANDER	3	33			4	44	1	11									1	11		1	100
BLACK																					
HISPANIC	1	10	1	10	6	60	1	10												1	10
WHITE	59	21	4	1	147	51	34	12			1			8	3		34	12		287	100
OTHER	2	25			3	38											3	38		3	100
JOINT (WHITE/MINORITY) 5/	1	14			2	28	3	43									1	14		1	100
RACE NOT AVAILABLE 6/	8	13	3	5	28	45	12	19						2	3		9	15		62	100
GENDER																					
MALE	12	15	6	7	37	46	13	16						4	5		9	11		81	100
FEMALE	26	31			35	42	8	10			1			2	2		11	13		83	100
JOINT (MALE/FEMALE) 7/	33	17	1	1	105	53	26	13						4	2		28	14		197	100
GENDER NOT AVAILABLE 6/	3	12	1	4	15	60	4	16									2	8		25	100
INCOME 8/																					
LESS THAN 50% OF MSA MEDIAN	21	25	5	6	39	47	11	13									7	8		83	100
50-79% OF MSA MEDIAN	24	21	1	1	67	57	12	10						3	3		10	9		117	100
80-99% OF MSA MEDIAN	11	16	1	1	32	48	10	15						2	3		11	16		67	100
100-119% OF MSA MEDIAN	5	11			22	47	5	11						3	6		12	26		47	100
120% OR MORE OF MSA MEDIAN	12	17	1	1	32	46	13	19			1			2	3		9	13		70	100
INCOME NOT AVAILABLE 6/	1	50															1	50		2	100

