

## **Executive Summary**

### **AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)**

#### **1. Introduction**

The Fiscal Year 2019 Annual Action Plan represents the fifth year of the City's Consolidated Plan (Con Plan) for Fiscal Years 2015-2019 as approved by the Oshkosh Common Council and approved by the US Department of Housing and Urban Development (HUD). The Action Plan is the City of Oshkosh's application for HUD entitlement grant funds and identifies the proposed programs and projects to be funded during the City's Fiscal Year (FY) 2019.

During the 2019 Program Year, the City of Oshkosh will pursue the implementation of projects and activities in four major categories: 1) Central City Redevelopment ; 2) Housing & Neighborhood Development; 3) Public Services; and 4) Program Administration & Planning. Of the \$835,154 in estimated CDBG funds plus 2018 Program Income, a minimum of 70% of funds must be spent on activities that will benefit LMI persons.

Activities funded with CDBG funds in this Action Plan will meet the national objectives of benefiting LMI persons and/or preventing or eliminating slum or blighting conditions.

It is important to note that the Con Plan sets goals and strategies to be achieved over the FY 2015 -2019 period and identifies a list of funding priorities. The six Con Plan Goals represent high priority needs for the City and serve as the basis for FY 2018 programs and activities identified in the Action Plan. The Con Plan goals are listed below in no particular order:

- Provide safe, decent, affordable housing
- Create strong and healthy neighborhoods
- Create suitable living environment through Public Services
- Provide overall administration of the CDBG program, conduct fair housing activities, as well as Comprehensive Planning activities.
- Create suitable living environment through public facilities or infrastructure improvements
- Create economic opportunities

#### **2. Summarize the objectives and outcomes identified in the Plan**

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

For details regarding the objectives and outcomes targeted in the Con Plan and this Annual Plan in relation to each of the six goals listed above, please refer to Sections AP-15 (Annual Goals and Objectives) and AP-35 (Projects).

### **3. Evaluation of past performance**

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

The City continues to monitor and evaluate the performance of the City's CDBG programs and activities while ensuring regulatory compliance. The City's Annual Action Plan and Consolidated Annual Performance and Evaluation Reports (CAPERS) have provided details about the innovations, projects and programs completed by the City over the past (documents may be viewed or downloaded from the City's website).

The City recognizes that the evaluation of past performance is critical to ensuring the City and its subrecipients are implementing activities effectively and that those activities align with the City's overall strategies and goals. The performance of programs and systems are evaluated on a regular basis. The City continues to improve the CDBG subrecipient application process in order to ease the administrative burden on applicants and volunteer community-member boards and reviewers.

### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

In accordance with the *Citizen Participation Plan* outlined in the Con Plan, the draft Action Plan was available online and hard copies were available at the Community Development Office at the Oshkosh City Hall.

The FY 2019 Action Plan was presented and discussed at the following meetings:

- Redevelopment Authority, May 15, 4:00 pm
- Neighborhood Public Hearing, May 16, 5:00 pm
- Plan Commission, May 21, 4:00 pm
- Common Council, May 28, 6:00 pm

Over the past several months, City staff also consulted with representatives from area agencies participating in the Winnebagoland Housing Coalition and the Oshkosh/Winnebago County Housing Authority. These agencies provide a wide spectrum of services in the community and represent needs of many different segments of the population to ensure future CDBG programming meets the needs of the community.

## **5. Summary of public comments**

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

Redevelopment Authority meeting, May 15, 2019 – a question was asked on how to apply for a public service grant. Staff noted the application is available online or through the Community Development office.

Public meeting, May 16, 2019 – no comments received

Plan Commission meeting, May 21, 2019 – no comments received

Common Council public hearing, May 28, 2019 – Question on priority areas. Staff noted priority areas have shifted from prior years and now are targeted at neighborhoods, gateways, redevelopment areas, as well as the Central City and LMI census tracts.

Please see minute excerpts in EXhibit A. No written comments were received.

## **6. Summary of comments or views not accepted and the reasons for not accepting them**

All public comments were accepted.

## **7. Summary**

The City of Oshkosh's FY 2019 Annual Action Plan has been prepared as a guide for the expenditure of CDBG funds based upon input from citizens and local agencies regarding the needs of the community and use of funds; an assessment of needs in the community related to housing and community development and an analysis of the area's market create a picture of the environment in which the program will be administered

**PR-05 Lead & Responsible Agencies – 91.200(b)**

**1. Agency/entity responsible for preparing/administering the Consolidated Plan**

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	OSHKOSH	
CDBG Administrator	OSHKOSH	Community Development Department
HOME Administrator		

**Table 1 – Responsible Agencies**

**Narrative (optional)**

The City of Oshkosh has designated its Community Development Department as the lead agency responsible for administration of the Community Development Block Grant (CDBG) program and associated reports. The Department is also the major public agency responsible for administering programs addressed in the Consolidated Plan and this FY 2019 Annual Action Plan, except for Homeless Programs. The Continuum of Care (CoC) for Homeless Programming is the Winnebagoland Housing Coalition with ADVOCAP as the local non-profit agency taking the leadership role in administration.

The City works with numerous community-based organizations, partners, businesses, other funders, as well as City of Oshkosh departments, to plan, develop, implement and evaluate activities outlined in this plan.

**Consolidated Plan Public Contact Information**

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## **AP-10 Consultation – 91.100, 91.200(b), 91.215(I)**

### **1. Introduction**

Consultation on development of this Plan was achieved through interviews and public hearings. Efforts were made to consult agencies that provide a wide range of services so that a clear picture of community needs would be available during development of the Plan.

#### **Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))**

When developing the Consolidated Plan, the City launched a collaborative effort to consult with elected officials, City departments, community stakeholders and beneficiaries of entitlement programs to inform and develop the priorities and strategies contained within the five year plan.

City staff also consulted with the Oshkosh/Winnebago County Housing Authority and the Winnebagoland Housing Coalition.

The Oshkosh/Winnebago County Housing Authority’s mission is to promote adequate and affordable housing, economic opportunity and a suitable living environment free from discrimination. The Authority’s staff are key participants in the preparation of the Consolidated Plan as well as Annual Action Plans and Consolidated Annual Performance and Evaluation Reports (CAPERs).

The Winnebagoland Housing Coalition has representatives from various housing and social service organizations including public and assisted housing providers and private and governmental health, mental health and service agencies. A representative from the City of Oshkosh Community Development Department meets monthly with the Coalition to obtain input from those focusing on housing and services related to individuals with disabilities, victims of domestic abuse, veterans, homeless, elderly persons, etc.

#### **Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.**

The Winnebagoland Housing Coalition is the name of the Continuum of Care (CoC) serving the Oshkosh area. A representative from the City of Oshkosh Community Development Department meets monthly with the Coalition to obtain input from those focusing on housing and services related to individuals with disabilities, victims of domestic abuse, homeless, elderly persons, etc. The process used by the COC to identify and prioritize homeless needs includes an annual review of previous year’s services provided,

bi-annual point-in-time survey of homelessness and a review of homeless client input and case notes by homeless service providers.

**Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

The City of Oshkosh does not receive or utilize emergency shelter grants within its jurisdiction. However, ADVOCAP, as the lead agency administering ESG funds, participates and consults with members of the WinnebagoLand Housing Coalition, of which the City of Oshkosh is an active member. Annually, ADVOCAP consults with the WinnebagoLand Housing Coalition to determine how ESG funds can be utilized to meet the needs of individuals in the Oshkosh area.

**2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities**

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	Oshkosh/Winnebago County Housing Authority
	<b>Agency/Group/Organization Type</b>	PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	discussed public housing needs in the community and how the city and housing authority could work together collaboratively
2	<b>Agency/Group/Organization</b>	Winnebagoland Housing Coalition
	<b>Agency/Group/Organization Type</b>	Continuum of Care
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Public service agencies
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	city staff attends monthly Coalition meetings to keep informed on services available and needs of the community
3	<b>Agency/Group/Organization</b>	City of Oshkosh Economic Development
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	economic development strategies and initiatives that are currently in place or may be undertaken
4	<b>Agency/Group/Organization</b>	Greater Oshkosh Economic Development Corp.
	<b>Agency/Group/Organization Type</b>	non profit economic development corp
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	A non-profit corporation that works with the community to provide leadership, direction, coordination, and services to advance economic development in the greater Oshkosh area
5	<b>Agency/Group/Organization</b>	Winnebago County Health Department
	<b>Agency/Group/Organization Type</b>	Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	discussion about actions taken / to be taken to evaluate children affected by lead based paint and how to address lead paint reduction
6	<b>Agency/Group/Organization</b>	ADVOCAP, INC.
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-homeless Services-Education Services-Employment



	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	collaborate on various programs/activities to best serve the community
7	<b>Agency/Group/Organization</b>	City of Oshkosh Public Works Department
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development public facilities / infrastructure
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	discussion regarding various infrastructure improvements planned during the program year
8	<b>Agency/Group/Organization</b>	Neighborhood Associations
	<b>Agency/Group/Organization Type</b>	neighborhood associations Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment neighborhood initiatives

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	discuss neighborhood programs/activities to create strong and healthy neighborhoods
9	<b>Agency/Group/Organization</b>	Day by Day Warming Shelter
	<b>Agency/Group/Organization Type</b>	Services-homeless Services-Health Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	provide shelter and advocacy
10	<b>Agency/Group/Organization</b>	Greater Oshkosh Housing Neighborhood Initiatives
	<b>Agency/Group/Organization Type</b>	non profit
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment neighborhood initiatives
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	expand on the organization's role in developing, expanding and organizing neighborhood planning projects/programs/activities, acquiring slum and blight properties

11	<b>Agency/Group/Organization</b>	HABITAT FOR HUMANITY OF OSHKOSH INC.
	<b>Agency/Group/Organization Type</b>	non-profit
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Habitat's continued role in construction of new affordable housing for LMI households. Continue partnership projects with City and local PHA
12	<b>Agency/Group/Organization</b>	Metropolitan Milwaukee Fair Housing Council
	<b>Agency/Group/Organization Type</b>	Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	fair housing
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	continue to contract with satellite office in Appleton to provide training opportunities for landlords and tenants, as well as investigate potential fair housing complaints in the community
13	<b>Agency/Group/Organization</b>	Oshkosh Public Service Consortium
	<b>Agency/Group/Organization Type</b>	Business and Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy Non-Homeless Special Needs public service agencies

<p><b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>collaboration effort between City, local community foundation and United Way to allocate funds to public service agencies</p>
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**Identify any Agency Types not consulted and provide rationale for not consulting**

not applicable

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	WinnebagoLand Housing Coalition	Alleviate the impact of homelessness in the community through cooperation and collaboration of social service providers
2005-2025 City of Oshkosh Comprehensive Plan	City of Oshkosh	City's general plan is comprised of ten elements that provide a comprehensive slate of city-wide policies and furthers the City's smart growth strategy for growth and development
City of Oshkosh Comp Plan - Housing	City of Oshkosh	Housing Element serves as a policy guide to help the city meet its existing and future housing needs. The Plan has the goal of creating and preserving affordable housing stock within the city.
Oshkosh Analysis of Impediments	City of Oshkosh	Analysis of Impediments to Fair Housing Choice presents a demographic profile of the city, assesses the extent of housing needs among specific income groups and evaluates the availability of a range of housing choices for residents

**Table 3 – Other local / regional / federal planning efforts**

**Narrative (optional)**

None

**AP-12 Participation – 91.105, 91.200(c)**

**1. Summary of citizen participation process/Efforts made to broaden citizen participation  
Summarize citizen participation process and how it impacted goal-setting**

City staff continues to work with the Oshkosh Public Service Consortium and community groups, organizations and agencies to increase citizen participation and improve the FY 2019 CDBG application and evaluation process. The City also seeks input from the Plan Commission to ensure projects and activities to be carried out are in compliance with the City's adopted Comprehensive Plan. The Plan Commission serves in an advisory capacity to the Common Council on issues related to the Consolidated Plan, Annual Action Plan, end of the year CAPER reporting, Analysis of Impediments to Fair Housing, as well as the CDBG allocation.

All meetings are open to the public and agendas are distributed via email, internet posting and hardcopy posting. Meeting notes summarizing the discussion items and actions taken are posted online and made available at subsequent meetings to keep interested parties informed.

City staff, along with partner agencies such as Oshkosh/Winnebago County Housing Authority and Winnebago Land Housing Coalition, receive feedback from the public and other community stakeholders regarding the implementation of HUD funded programs through presentations and attendance at monthly meetings.

**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-targeted/broad community	2 citizens attended. See sign in sheet in Exhibit A	no comments received	all comments accepted	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Redevelopment Authority - public meeting	Non-targeted/broad community	6 Board members present	Question on how to apply for a public service grant. See excerpt from minutes in Exhibit A	all comments accepted	
3	Plan Commission - public meeting	Non-targeted/broad community	10 Board members present	no comments received. See excerpt from minutes in Exhibit A	all comments accepted	
4	Common Council - public hearing	Non-targeted/broad community	7 Council members present; several citizens also present	Question on priority areas. Staff noted priority areas have shifted from prior years and now are targeted at neighborhoods, gateways, redevelopment areas, as well as the Central City and LMI census tracts.	all comments accepted	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
5	Oshkosh Public Service Consortium	Non-targeted/broad community	public service applications being accepted distributed to 30+ public service organizations; notice posted on City's webpage; discussed at Housing Coalition meeting	15 applications were received. Applications reviewed by the Public Service Committee. 12 applications were funded.	all comments accepted	
6	Newspaper Ad	Non-targeted/broad community	A notice of public hearing regarding the City's 2019 CDBG funding allocations and public hearings to obtain citizen input was published in the local newspaper on May 7. See Exhibit A	no comments received	all comments accepted	

**Table 4 – Citizen Participation Outreach**

## Expected Resources

### AP-15 Expected Resources – 91.220(c)(1,2)

#### Introduction

Please see information provided below

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	835,154	0	0	835,154	462,383	The City does not anticipate receiving any program income. However, any program income generated will be placed in a revolving loan fund and used exclusively for projects/programs eligible under housing/neighborhood projects



Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	0	0	0	0	0	The City does not receive HOME funds

Table 5 - Expected Resources – Priority Table

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

While the CDBG program does not require leveraging, the program does leverage other resources. The City budgets funds in its Capital Improvement Program for additional programs for housing related activities (i.e. acquisition, housing rehabilitation), public facility improvements, landscaping, curb appeal projects, and acquisition of properties to eliminate slum and blight.

The Oshkosh Area Community Foundation and the Oshkosh United Way partner with the City of Oshkosh in forming the Oshkosh Public Service Consortium. The Consortium seeks applications from public service agencies for programs/activities that meet one of HUD's national objectives

and benefit low- to moderate-income households.

**If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

The City of Oshkosh may provide vacant/undeveloped lots to private developers, Habitat for Humanity, Advocap or other non-profit/CHDO agencies for construction of new affordable housing units.

**Discussion**

not applicable

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Provide safe, decent, affordable housing	2015	2019	Affordable Housing Non-Homeless Special Needs	Oshkosh Priority Areas	Affordable Housing - rehabilitation	CDBG: \$335,154 HOME: \$0	Homeowner Housing Rehabilitated: 15 Household Housing Unit Direct Financial Assistance to Homebuyers: 2 Households Assisted
2	Central City Redevelopment & Community Facilities	2015	2019	Non-Housing Community Development Slum and blight	Oshkosh Priority Areas	Affordable Housing - rehabilitation Public Facilities & Improvements	CDBG: \$300,000 HOME: \$0	Buildings Demolished: 3 Buildings Other: 1 Other
3	Public services	2015	2019	Homeless Non-Homeless Special Needs	Oshkosh Priority Areas	Public Services	CDBG: \$117,000 HOME: \$0	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 20000 Households Assisted Homeless Person Overnight Shelter: 500 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Administration/Planning	2015	2019	General Program Administration	Oshkosh Priority Areas	Planning and Program Administration	CDBG: \$83,000 HOME: \$0	Other: 1 Other

Table 6 – Goals Summary

### Goal Descriptions

1	<b>Goal Name</b>	Provide safe, decent, affordable housing
	<b>Goal Description</b>	Funds will be used to rehab and expand the City's affordable housing stock for LMI households as well as to stabilize and visually improve older LMI neighborhoods. Also funds will be used to provide home ownership opportunities to eligible homebuyers by providing downpayment assistance loans. Funds will also be used to acquire homes in need of repair, make needed repairs and sell the homes to qualified homebuyers.
2	<b>Goal Name</b>	Central City Redevelopment & Community Facilities
	<b>Goal Description</b>	Funds will be used to assist with the redevelopment of blighted properties within the central city, acquisition of spot blighted properties or in designated redevelopment areas.
3	<b>Goal Name</b>	Public services
	<b>Goal Description</b>	Funds will be provided to local non-profit agencies that provide needed services to low and moderate income individuals and households.
4	<b>Goal Name</b>	Administration/Planning
	<b>Goal Description</b>	Funds will be used for salaries of personnel involved in CDBG program management and administration, as well as associated training & related costs; fair housing services; environmental consultants; and preparation of various documents/plans relative to the entitlement program.

# Projects

## AP-35 Projects – 91.220(d)

### Introduction

During the 2019 Program Year, the City of Oshkosh will pursue the implementation of projects and activities in four major categories:

- Central City Redevelopment
- Housing & Neighborhood Development
- Public Services
- Program Administration & Planning

The use of CDBG funds in 2019 will focus on activities and programs that:

- Improve and maintain housing and create accessibility to homeownership for income qualified homebuyers
- Revitalize neighborhoods through streetscaping improvements, curb appeal improvements, elimination of slum and blight properties
- Provide funding to various public service agencies, to be determined, that provide shelter/ services to persons that are homeless, affected by domestic abuse, recovering from addiction, need health care services, etc
- Provide training for landlords or tenants on fair housing regulations
- Provide administration of the overall CDBG program

### Projects

#	Project Name
1	Central City Redevelopment
2	Housing Rehabilitation
3	Public Services
4	Administration/Planning

Table 7 - Project Information

**Describe the reasons for allocation priorities and any obstacles to addressing underserved needs**

The City will continue to initiate progress towards implementing programs/activities in LMI/LMA neighborhoods. City departments will continue to participate in internal discussions (Police, Inspections, Planning, Assessor, etc) and coordinate with citizens in identified areas (such as neighborhood associations). By coordinating actions of City staff, the obstacle for staff capacity will be addressed so that actions can be as concentrated as possible. Also by involving the residents of these neighborhoods, the residents will be a resource of information and for implementation of the strategies.

Coordination between the public and private sectors will form a partnership to address priorities of these neighborhoods. The intended outcome of tailoring needs to the neighborhoods will be that the residents will be much more informed and intricately involved in the governance and neighborhood redevelopment activity processes in order to direct and aid in the implementation of neighborhood projects. The City's partnership with a local non-profit, Greater Oshkosh Healthy Neighborhood Initiative (GO-HNI), is intended to be used as a nongovernmental tool to assist in the establishment of neighborhood associations. The goals of this partnership are neighborhood revitalization, community building, lending, homebuyer education, housing rehabilitation, general review of the housing and neighborhood improvement programs and broader neighborhood improvement activities, as determined by the City, GO-HNI and resident lead neighborhood associations.

**AP-38 Project Summary**  
**Project Summary Information**



<b>1</b>	<b>Project Name</b>	Central City Redevelopment
	<b>Target Area</b>	Oshkosh Priority Areas
	<b>Goals Supported</b>	Provide safe, decent, affordable housing Central City Redevelopment & Community Facilities
	<b>Needs Addressed</b>	Affordable Housing - rehabilitation Neighborhood Initiatives Public Facilities & Improvements
	<b>Funding</b>	CDBG: \$300,000
	<b>Description</b>	Assist with redevelopment of blighted properties within the central city, acquisition of scattered spot blighted properties, properties within designated redevelopment areas, or approved neighborhood associations. Activities may include acquisition, relocation, demolition, environmental remediation, public facility improvements, streetscaping and site clearance.
	<b>Target Date</b>	4/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Projects/activities will benefit the community as a whole, estimated population 66,700. Some projects may have a direct benefit to an immediate surrounding neighborhood.
	<b>Location Description</b>	City-wide
	<b>Planned Activities</b>	Elimination of slum and blight through acquisition and demolition, housing improvement projects, streetscaping on streets where blocks are MLA or on individual parcels where the property owners are LMI
<b>2</b>	<b>Project Name</b>	Housing Rehabilitation
	<b>Target Area</b>	Oshkosh Priority Areas
	<b>Goals Supported</b>	Provide safe, decent, affordable housing
	<b>Needs Addressed</b>	Affordable Housing - rehabilitation
	<b>Funding</b>	CDBG: \$335,154
	<b>Description</b>	Funds used to rehab and expand the City's affordable housing stock for LMI households as well as the stabilize and visually improve older LMI neighborhoods. Funds will be used to provide home ownership opportunities to eligible homebuyers by providing direct downpayment assistance loans. Funds will be used to acquire homes in need of repair, make needed repairs and sell the home to qualified homebuyer.

	<b>Target Date</b>	4/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	15 owner occupied homes rehabilitated 2 homebuyers assisted
	<b>Location Description</b>	City wide eligible LMI households
	<b>Planned Activities</b>	Improve and maintain affordable housing for LMI persons/households; home ownership assistance, rental rehabilitation, acquisition, rehjab and resale to eligible homebuyers
<b>3</b>	<b>Project Name</b>	Public Services
	<b>Target Area</b>	Oshkosh Priority Areas
	<b>Goals Supported</b>	Public services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$117,000
	<b>Description</b>	funds provided to local non-profit agencies that provide needed services to LMI individuals and households. An established Public Service Consortium Committee consisting of citizens at large provide for a streamlined application and evaluation process and reduce funding overlaps with limited dollars
	<b>Target Date</b>	4/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Homeless persons in overnight shelters - 500 LMI persons assisted Other public service activities - e3timated 20,000 LMI persons assisted
	<b>Location Description</b>	City wide
	<b>Planned Activities</b>	The public service consortium will allocate funds to public service agencies that have applied for funding through the City's application process. Activities may include health care assistance, emergency shelter, food pantry, peer support, advocacy and education, emergency assis5tance, oral hygiene for children
<b>4</b>	<b>Project Name</b>	Administration/Planning
	<b>Target Area</b>	Oshkosh Priority Areas
	<b>Goals Supported</b>	Administration/Planning

<b>Needs Addressed</b>	Planning and Program Administration
<b>Funding</b>	CDBG: \$83,000
<b>Description</b>	Funds used for salaries of personnel involved in CDBG program management/administration, as well as associated training and related costs; fair housing; environmental consultants; preparation of various documents/plans relative to the entitlement program
<b>Target Date</b>	4/30/2020
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	community wide
<b>Location Description</b>	City-wide
<b>Planned Activities</b>	Program administration costs such as salaries, training, etc of staff involved in CDBG program management/administration. Funds to hire consultants to assist in preparation of various plans (i.e. Analysis of Impediments to Fair Housing Choice; Phase I/II environmental assessments)

## AP-50 Geographic Distribution – 91.220(f)

### Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

All programs, projects, and activities to be carried out under the 2019 Annual Action Plan will meet one of the three National objectives of:

- Benefit to low and moderate income (LMI) persons.
- Aid in the prevention or elimination of slums or blight.
- Meet a need having a particular urgency

Funds will be used to assist LMI persons and households on a city-wide basis or in neighborhoods with approved associations, occur in and benefit LMI/LMA census tracts/block groups, or in spot blighted or approved redevelopment areas. See Exhibit B for low to moderate income census block groups and Exhibit C for the City’s approved neighborhood association map. It should be noted the neighborhood associations map (Exhibit C) will change as new associations are recognized by the City.

### Geographic Distribution

Target Area	Percentage of Funds
Oshkosh Priority Areas	100

Table 8 - Geographic Distribution

### Rationale for the priorities for allocating investments geographically

Assistance will be directed primarily to LMI census tracts and block groups and recognized neighborhood associations (as shown in the maps in Exhibit B and Exhibit C.), as well as properties spot blighted or designated as redevelopment areas by the City, or on a community wide basis to LMI income eligible persons. The majority of the LMI census tracts and block groups are located within the oldest areas of the Central City, which are predominately single and two family residential neighborhoods (though many have experienced inappropriate single family to multiple family conversions), but also include a mix of commercial, industrial and institutional uses.

Residents in these areas have limited financial capacity to address housing and non-housing conditions, as well as neighborhood revitalization efforts. The City’s 2019 CDBG Action Plan activities and programs are intended to address these needs.

### Discussion

not applicable

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

In 2019, the City of Oshkosh will support affordable housing needs in Oshkosh by:

- Providing funds for the City's homeowner rehabilitation program to assist low- and moderate-income homeowners with needed repairs and maintenance.
- Providing downpayment assistance to income eligible homebuyers who have participated in approved classes.
- Providing rental rehabilitation funds to assist landlords with needed repairs and maintenance.
- Collaborate with the City's housing partners (Habitat for Humanity, Advocap and Oshkosh/Winnebago County Housing Authority) in acquiring properties for construction/ rehabilitation of affordable homes for income eligible families.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	0
Non-Homeless	15
Special-Needs	0
Total	15

**Table 9 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	15
Acquisition of Existing Units	2
Total	17

**Table 10 - One Year Goals for Affordable Housing by Support Type**

#### Discussion

not applicable

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The City of Oshkosh will provide funding to support the Oshkosh/Winnebago County Housing Authority and the local Habitat for Humanity's homebuyers programs with downpayment assistance loans and rehabilitation as needed for repairs/code violations.

### **Actions planned during the next year to address the needs to public housing**

The City of Oshkosh will collaborative with the Oshkosh/Winnebago County Housing Authority on projects to further affordable housing for low- to moderate-income households and/or disabled households.

### **Actions to encourage public housing residents to become more involved in management and participate in homeownership**

The City of Oshkosh will collaborate with the Oshkosh/Winnebago County Housing Authority on projects to further affordable housing for low- to moderate-income households and/or disabled households.

The Housing Authority encourages its residents to participate in various activities and programs to improve themselves and make them more self-sufficient. The Housing Authority works with the local FISC office in offering homebuyer education classes and credit counseling for those residents interested in homeownership. FISC is a certified counseling agency.

The Authority offers a Family Self-Sufficiency (FSS) program to help housing choice voucher and public housing family unit recipients attain self-sufficiency through education advancement, employment skill development, access to community resources, home ownership opportunities and development of financial assets with the goal of improving their family's financial situation and overall quality of life.

### **If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**

The Oshkosh/Winnebago County Housing Authority is not designated as troubled.

### **Discussion**

not applicable

## **AP-65 Homeless and Other Special Needs Activities – 91.220(i)**

### **Introduction**

Coordination and delivery of homeless services is provided through a Homeless Service Providers Network as part of the Continuum of Care. ADVOCAP serves as the lead agency within the Network, which also includes Christine Ann Domestic Abuse Services (CADASI), American Red Cross of East Central Wisconsin, Legal Action of Wisconsin, and The Salvation Army – Oshkosh Corps. ADVOCAP also serves as lead agency and fiscal agent for consolidated applications for HUD ESG/THP and HPP funds. Additionally, ADVOCAP serves as lead agency for participation in the Balance of State Continuum of Care organization. Both the WinnebagoLand Housing Coalition and the Homeless Service Providers Network discuss homeless prevention activities and strategies. The City will continue to participate in these meetings and assist with funding where possible.

The City continues to collaborate with the local warming shelter on how the City can assist in the Shelter's efforts to construct a more permanent shelter facility that will offer on-site services and resources and additional beds.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

#### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

Homeless service providers maintain contact with other agencies that may not be active members of the housing coalition to facilitate homeless participants accessing services in a timely manner or to assure appropriate referral of persons by other agencies to the homeless service providers.

Also, ADVOCAP provides staff support to conduct point in time surveys of homeless needs, prepare annual needs assessment and prioritization of unmet needs, and write grants for joint homeless activities. Joint training activities are also planned to benefit participating agencies.

The City will continue to participate on the WinnebagoLand Housing Coalition to provide and obtain input from organizations providing the necessary services and assist with funding where possible.

#### **Addressing the emergency shelter and transitional housing needs of homeless persons**

The City of Oshkosh will continue to support the Day by Day Warming shelter that serves a small but definite population of persons with limited shelter options in the community. The Day by Day Warming Shelter adds an important level to the continuum of care in this area by providing a safe setting to a vulnerable homeless population. Despite nearly 200 success stories of guests working toward self-sufficiency at the shelter, the need for temporary overnight shelter is growing in Oshkosh. The City will

continue to support this public service activity in 2019.

Homelessness and the factors affecting it are increasing and the temporary local warming shelter has to regularly turn people in need away. The City will s working with Day by Day Warming Shelter in its pursuit of a more permanent shelter facility that will offer on-site services and resources and additional beds. Day by Day is currently completing a feasibility study and hopes to begin the fundraising campaign before fall with construction by early spring.

Also, the Redevelopment Authority (RDA) of the City of Oshkosh has leased a single family house to Advocap for short term transitional housing.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

Goals of the WinnebagoLand Housing Coalition include:

- Promote public and private funds to expand affordable housing opportunities and supportive services
- Educate agencies on legislative issues that impact affordable housing
- Educate public officials about housing issues
- Identify issues regarding emergency housing and homelessness in the community
- Adopt in-service agendas and endorse solutions to emergency housing issues and homelessness

As a prevention strategy, an area of emphasis is providing more employment-related services to help persons move from shelter into permanent housing.

The City will continue to participate on the WinnebagoLand Housing Coalition to provide and obtain input from organizations providing the necessary services and assist with funding where possible

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.**



The City will continue to participate on the WinnebagoLand Housing Coalition to provide and obtain input from organizations providing the necessary services and assist with funding where possible.

While City staff will not lead the effort to create a discharge policy, staff will participate in any efforts to create such a policy.

## **Discussion**

The City of Oshkosh does not receive any private or public funds to address homeless needs or to prevent homelessness. There are a number of public and private organizations providing these homeless services in the community and the City supports these agencies through funding to the Public Service Consortium.

The Continuum of Care (CoC) in Oshkosh has a direct influence in addressing the needs of the homeless.

The following priorities were established by the CoC and continue to be followed:

- 1) Service gap in short term assistance
- 2) Case management with supportive services
- 3) Accessible emergency shelter along with motel vouchers
- 4) Medical and health related services
- 5) Transportation help
- 6) Transitional housing
- 7) Housing and supportive services for chronic homeless
- 8) Essential personal needs such as food, clothing and personal care items
- 9) Subsidized permanent housing
- 10) Foreclosure help
- 11) Daycare support
- 12) Fair housing assistance

## **AP-75 Barriers to affordable housing – 91.220(j)**

### **Introduction:**

The City's 2005-2025 Comprehensive Plan, as updated, calls for the following actions to maintain and rehabilitate the City's existing housing stock:

- Continue housing rehabilitation programming which provides assistance to low and moderate income persons in upgrading their housing and in purchasing and improving properties in older neighborhoods.
- Encourage downtown/central city residential development through rehabilitation or new construction
- Implement "Neighborhood Improvement Strategies" for neighborhood and housing issues.
- Develop program and encourage owners to convert non-competitive rental property back to owner occupied structures.
- Create a rehabilitation code for pre-existing conditions on historic properties.
- Work with public and private housing providers to plan for the development of additional housing units affordable to low and moderate income owner and renters as needed and to secure additional subsidies for rental of existing privately owned units.

In January 2017 the City of Oshkosh implemented a Residential Rental Inspections Program to protect the health and safety of rental residents in the community. The Oshkosh Common Council created the program in response to findings that a significant percentage of housing code complaints and violations were occurring within rental properties leading to an adverse affect on residents and neighborhoods, contributing to decreased property values and neighborhood blight. The intent of the program is to encourage Oshkosh rental property owners to exercise their responsibility to meet code requirements to provide safe and sanitary living conditions for tenants. Program guidelines were also drafted in keeping with current Federal and Wisconsin State laws.

The City will continue to fund programs and activities that address affordable housing for all citizens to the extent possible. However, due to funding limitations both through Federal programs and at the local level, the City will have to use its funding strategically.

During the coming program year, the City will be undertaking an Analysis of Impediments (AI) to Fair Housing study. A consultant will be hired following the procurement requirements of 2 CFR 200 to prepare the AI for submittal to HUD. The Analysis of Impediments will perform an assessment of fair housing, defines and undertakes the community/stakeholder participation process, and the identification of contributing factors and the establishment of priorities and goals that lead to meaningful actions that affirmatively further fair housing. The AI will also state how the City of Oshkosh, will act on its responsibility to address fair housing contributing factors and appropriate actions to

overcome the effects of those factors and other actions in this regard.

**Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

The City's current Analysis of Impediments (AI) summarized actions to be taken to address barriers to affordable housing. The City's Analysis of Impediments is attached as Exhibit D. The City of Oshkosh has, and will continue to use, various strategies to address or ameliorate any negative effects of public policy that are barriers to affordable housing.

The City of Oshkosh revised its Fair Housing Ordinance to include transgender individuals as a protected class, as well as reflect the current structure for investigation and disposition of complaints through a third party contractor (Fair Housing Council of Northeast Wisconsin).

The City of Oshkosh approved a Residential Rental Registration and Inspection Ordinance (rental registry). The City-wide program is for the registration and inspection of residential rental dwelling units to ensure units provide safe, decent and sanitary living conditions for tenants and to prevent further deterioration of those units.

The Oshkosh public transportation system, provides bus service to LMI households in Census Tracts 1, 2, 4, 5, 7, 8, 11, 12, 14 and 15.

As City streets are resurfaced, they are designed to enable safe access for all users, including pedestrians, cyclists, motorists and transit riders, that helps create a livable community for all citizens.

Also, there are a number of State and local regulations designed to promote the orderly development and maintenance of safe, decent and sanitary housing in the community. To eliminate duplication, the City uses the building codes established by the State for uniform construction standards. Consequently, the City's building codes do not appear to hinder the development or preservation of affordable housing.

Likewise, the locally established Minimum Housing Code does not create a barrier for affordable housing. These standards parallel the National Minimum Housing Code Standards and are minimum requirements established to preserve and promote the public health, safety, comfort, personality and general welfare of the people. Their enforcement is necessary to preserve and encourage the private/public interests in housing and its maintenance.

The City's zoning and land-use codes promote the morals, aesthetics, prosperity, health, safety and general welfare of all people in Oshkosh. These codes are constructed to allow compatible development throughout the community and are flexible enough to encourage redevelopment in the community's existing, established areas.

All residential properties are assessed on a citywide basis using market sales data of comparable properties in and around the immediate neighborhood. Citywide assessing ensures an equitable treatment of residential property and provides an incentive to those who maintain and improve their properties.

The current public policies relating to housing and, in particular, affordable housing, do not appear to be excessive, exclusionary, or discriminatory nor do they duplicate any other policies. The City will work with developers, homeowners and public agencies that encounter barriers to affordable housing to address the issues.

**Discussion:**

The City of Oshkosh will contract with the Fair Housing Council of Northeast Wisconsin (FHCNW) during the 2019 PY to provide comprehensive fair housing enforcement, outreach, education and technical assistance services to Oshkosh residents. Discrimination continues today in both subtle and overt ways, and many housing consumers and providers have poor understanding of the rights and responsibilities provided by fair housing laws. Fair housing issues affect all participants in the housing market. Under the City's contract, FHCNW will provide training to landlords and/or tenants in Oshkosh, as well as social service agencies or other organizations that serve Oshkosh. Most other activities to address impediments to fair housing identified in the City's AI, will be undertaken by City staff.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

A primary obstacle to meeting the underserved needs in the City of Oshkosh is the lack of available funding to the City and to the various non-profit agencies the City partners with in serving LMI residents. As entitlement grants shrink, the cost of delivery services and competing projects increase and the economy continues to be challenging -- the need is greater.

### **Actions planned to address obstacles to meeting underserved needs**

Due to funding limitations both through HUD programs and at the local level, the City will have to use its funding strategically. For redevelopment or neighborhood projects, funds will be concentrated first in approved neighborhoods, LMI/LMA census tracts/block groups, spot blighted and redevelopment areas.

The State of Wisconsin also continues to have issues with budget deficits, which has a direct effect on the amount of shared revenue coming into the local level for projects and programs. The reduction of shared revenues is expected to continue or increase. This loss of funding will directly affect the amount of funds that can be budgeted for housing locally.

### **Actions planned to foster and maintain affordable housing**

The City will continue to fund the housing rehabilitation program to rehabilitate and improve existing units for both homeowners and renters and provide downpayment assistance to eligible homebuyers. In order to achieve any type of sustainable revitalization success, funds must be programmed and resources targeted to effect change in transitional and distressed neighborhoods.

Wisconsin Statutes permit the use of the final year of tax increment in a terminating Tax Increment District to be used to fund improvements to the housing stock (primarily benefitting affordable housing). The City created the Healthy Neighborhood Initiative Program in 2012 to concentrate its local resources into program neighborhoods to achieve revitalization. The goal is to attract homeowners and private investment back into participating neighborhoods. Using a combination of funding sources, such as local capital improvement general obligation bonds for public realm improvements, CDBG and Healthy Neighborhood Initiative Program funds, will strengthen neighborhoods throughout the community for the benefit of all residents and income levels.

### **Actions planned to reduce lead-based paint hazards**

Any program that undertakes rehabilitation work will meet the requirements of the lead safe housing rules.

### **Actions planned to reduce the number of poverty-level families**

In the past, CDBG funds have been allocated to local homeless shelters, a domestic abuse shelter, food pantry and other public service agencies that directly serve families and individuals that are facing financial hardship. The City will continue to fund public service agencies under the CDBG program guidelines.

### **Actions planned to develop institutional structure**

City staff will continue to participate and serve on community organization boards to maintain open communication with other governmental entities and service providers throughout the community.

### **Actions planned to enhance coordination between public and private housing and social service agencies**

City staff will continue to participate in Winnebagoland Housing Coalition meetings which is a valuable forum used to communicate ongoing or developing issues within the community, especially in terms of housing, homelessness and the needs of special populations. City staff will use these discussions to evaluate needs in terms of how CDBG funds may be able to fund activities to assist with these issues.

### **Discussion:**

not applicable

## Program Specific Requirements

### AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

#### Introduction:

not applicable

### Community Development Block Grant Program (CDBG)

#### Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>0</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	71.00%

### HOME Investment Partnership Program (HOME)

#### Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is

as follows:

The City of Oshkosh does not receive HOME funds

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The City of Oshkosh does not receive HOME funds.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The City of Oshkosh does not receive HOME funds.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

The City of Oshkosh does not receive HOME funds.



## Attachments

## Citizen Participation Comments

### EXHIBIT A

Notice of Public Hearing  
City of Oshkosh  
2019 CDBG Program

The City of Oshkosh will hold a public hearing on Thursday, May 16, 2019 at 5:00 PM at the Oshkosh City Hall, 215 Church Avenue, Second Floor Conference Room, Room 203, to hear public comments pertaining to the City's 2019 Community Development Block Grant (CDBG) Annual Action Plan to be submitted to the US Department of Housing and Urban Development (HUD).

The proposed use of 2019 CDBG funds as shown in the table below is tentative until the City's 2019 Action Plan is approved by the Common Council and HUD. A draft version of the Action Plan may be found on the City's website [http://www.ci.oshkosh.wi.us/Community\\_Development/Economic\\_Development/index.asp](http://www.ci.oshkosh.wi.us/Community_Development/Economic_Development/index.asp). Copies of the Plan are available for viewing at the Oshkosh Public Library or the Community Development Office, Room 201 at City Hall.

Housing/neighborhood projects	\$ 335,154
Central City	\$ 300,000
Public Service	\$ 117,000
Administration & Fair Housing	<u>\$ 83,000</u>
2019 CDBG Allocation	\$ 835,154

Comments will also be accepted on the draft 2019 CDBG Action Plan at the following public meetings, which are held at City Hall, 215 Church Avenue.

- Redevelopment Authority on May 15 at 4:00 pm
- Plan Commission on May 21 at 4:00 pm
- Common Council on May 28 at 6:00 pm

If persons planning on attending have specialized needs (interpreter, handicap accessibility, etc.), please contact the Community Development Department at 920.236.5029 at least 5 days prior to a meeting. Written comments on the proposed Action Plan should be submitted no later than May 31 to [dbrandt@ci.oshkosh.wi.us](mailto:dbrandt@ci.oshkosh.wi.us) or mailed to Darlene Brandt, Oshkosh City Hall, 215 Church Avenue, Oshkosh, WI 54901.

Published: May 7 2019

EXHIBIT A

EXCERPT FROM

REDEVELOPMENT AUTHORITY MINUTES

May 15, 2019

PRESENT: Thomas Belter, Steve Hintz, Jason Lasky, Lori Palmeri, Susan Panek, Archie Stam

EXCUSED: Jack Bermingham,

STAFF: Allen Davis, Executive Director/Community Development Director; Lynn Lorensen, City Attorney; Darlene Brandt, Grants Coordinator; Andrea Flanigan, Recording Secretary;

Chairman Palmeri called the meeting to order at 4:00 pm. Roll call was taken and a quorum declared present.

**19-17 Support Projects and Programs Proposed in the 2019 CDBG Action Plan**

*Motion by Stam to move Res. 19-18.*

*Seconded by Belter.*

Mr. Belter inquired if the funding due to the pending purchases will change anything in the plan.

Ms. Brandt stated the 2018 CDBG funds should be spent in a timely manner because there are a few demolitions to be completed with 2018 funding. The 2019 Action Plan as proposed allocates \$300,000 for central city slum and blight acquisition and elimination. If the RDA is not looking to proceed with these types of activities on a standard basis there could be a problem meeting the timeliness ratios.

Mr. Lasky inquired what the Public Services are for \$117,000.

Ms. Brandt stated the City formed a Consortium with the Oshkosh Area Community Foundation and Oshkosh Area United Way to better serve the low to moderate income citizens of Oshkosh that need assistance with public service activities and needs. Some of the past recipients of public service funds include, Winnebago County Literacy Council, ADVOCAP and Tri-County Dental, Day by Day Warming Shelter, Christine Ann.

Mr. Lasky inquired how organizations would apply for the grant.

Ms. Brandt stated the Consortium is accepting applications until May 22<sup>nd</sup>. There is a selection committee that ranks and allocates funds.

Mr. Lasky inquired if the funding meets the need.

Ms. Brandt stated the funding requests by the organizations exceed the \$117,000 for Public Services but it is the maximum amount that can be spent in this area.

Ms. Palmeri inquired how an organization would apply for the grant.

Ms. Brandt stated applications are available on the City's website. There were also between 30-40 notices sent out to area organizations as well as a public service announcement to the media outlets.

*The item was called. Motion carried 6-0.*



EXHIBIT A  
EXCERPT FROM  
PLAN COMMISSION MINUTES

May 21, 2019

PRESENT: Thomas Fojtik, Michael Ford, Derek Groth, John Hinz, John Kiefer, Andrew Mott, Lori Palmeri, Thomas Perry, Kathleen Propp, Robert Vajgrt

EXCUSED: Ed Bowen

STAFF: Darryn Burich, Planning Director; Kelly Nieforth, Economic Development Services Manager; Amy VandenHogen, Assistant City Attorney; Justin Gierach, Engineering Division Manager / City Engineer; Mark Lyons, Principal Planner; Jeff Nau, Associate Planner; Brian Slusarek, Assistant Planner; Steven Wiley, Assistant Planner; Mina Kuss, Recording Secretary

Chairperson Fojtik called the meeting to order at 4:00 pm. Roll call was taken and a quorum declared present.

The minutes of May 7, 2019 were approved as presented. (Hinz/Vajgrt)

**VIII. REVIEW 2019 ANNUAL ACTION PLAN, COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM**

Staff report accepted as part of the record.

Darlene Brandt, Oshkosh Grants Coordinator, presented the item and explained the objectives of the program. Annually, the City prepares and submits to the US Department of Housing and Urban Development (HUD), an Action Plan to demonstrate how estimated federal CDBG funds will be spent. The 2019 Program Year begins May 1, 2019 and will end April 30, 2020. The 2019 allocation is \$835,154. As proposed, the 2019 allocation and carry over funds from the 2018 program year, over 70% of CDBG funds will benefit low to moderate income (LMI) persons during the program year. Public Service applications (via the Consortium) are currently being accepted by the City and will be reviewed by a committee consisting of representatives from Oshkosh Area United Way, Oshkosh Area Community Foundation, and the City of Oshkosh. Staff is recommending that the City allocate \$117,000 for public service activities/programs; \$335,154 for the Housing Improvement Program; \$300,000 to Central City Redevelopment for slum and blight removal and \$83,000 for Administration & Fair Housing. Prior to Council consideration, the Action Plan is reviewed by the Plan Commission for consistency with the City's 2005-2025 Comprehensive Plan, Comprehensive Plan Update 2040, official maps, and other planned activities of the City.

*Ms. Palmeri left at 6:00 pm.*

Mr. Fojtik opened technical questions to staff.

There were no technical questions on this item.

Mr. Fojtik asked if there were any public comments.

There were no public comments on this item.

Mr. Fojtik closed public comments.

*Motion by Ford to adopt the findings and recommendation as stated in the staff report and that the proposed 2019 CDBG Action Plan is consistent with the City's 2005-2025 Comprehensive Plan, Comprehensive Plan Update 2040, official maps, and other planned activities of the City.*

*Seconded by Hinz.*

Mr. Fojtik asked if there was any discussion about the motion.

There was no discussion on the motion.

*Motion carried 5-0-2 (Abstain: Fojtik and Perry).*

EXHIBIT A  
Excerpt  
*PROCEEDINGS OF THE COMMON COUNCIL*  
*CITY OF OSHKOSH, WISCONSIN*  
*MAY 28, 2019*

REGULAR MEETING held Tuesday, May 28, 2019, at 5:00 p.m. in Council Chambers, City Hall

Mayor Palmeri presided.

PRESENT: Council Matt Mugerauer, Jake Krause, Bob Poeschl, Bill Miller, Deb Allison-Aasby, Steven Herman and Mayor Lori Palmeri

Resolution 19-291 Authorize Submittal of 2019 CDBG Action Plan

MOTION: ADOPT (Allison-Aasby; second, Mugerauer)

CARRIED: Ayes (6) Mugerauer, Krause, Miller, Allison-Aasby, Herman, Mayor Palmeri  
Present (1) Poeschl

Council Member Herman requested an explanation of the highlights of the application and the plans for the grant funds.

Mr. Davis stated the City received the federal grant funds from the Department of Housing and Urban Development (HUD). He explained the proceeds could be used for housing and urban development activities, and had been allocated for rehabilitation of affordable housing in the City, blight elimination and public services to meet the needs of low and moderate income residents. He stated they would also be used towards administration costs and fair housing items that were required.

Council Member Herman questioned how citizens could receive additional information.

Mr. Davis stated citizens could contact Community Development at 920-236-5055 if they had an interest in utilizing any of the programs. He explained they would need to meet certain HUD requirements.

Mayor Palmeri asked for an explanation of how priority one areas were distinguished from priority two areas.



Darlene Brandt, Grant Coordinator, explained priority areas had been determined based on eligibility for certain activities within the community development block grant program. She stated the category of housing rehabilitation had eligible properties scattered throughout the community; they just had to be income qualified. She explained central City redevelopment, which included slum and blight removal, was required to be located in a low to moderate income census tract. She stated the census tracts had changed since the creation of the priority map

Mayor Palmeri questioned if there was a consultant being hired to update the impediments to fair housing report.

Ms. Brandt stated yes.

Mayor Palmeri questioned what the time frame was on the report.

Ms. Brandt explained City staff should be able to provide it to Council for approval before the end of the year.

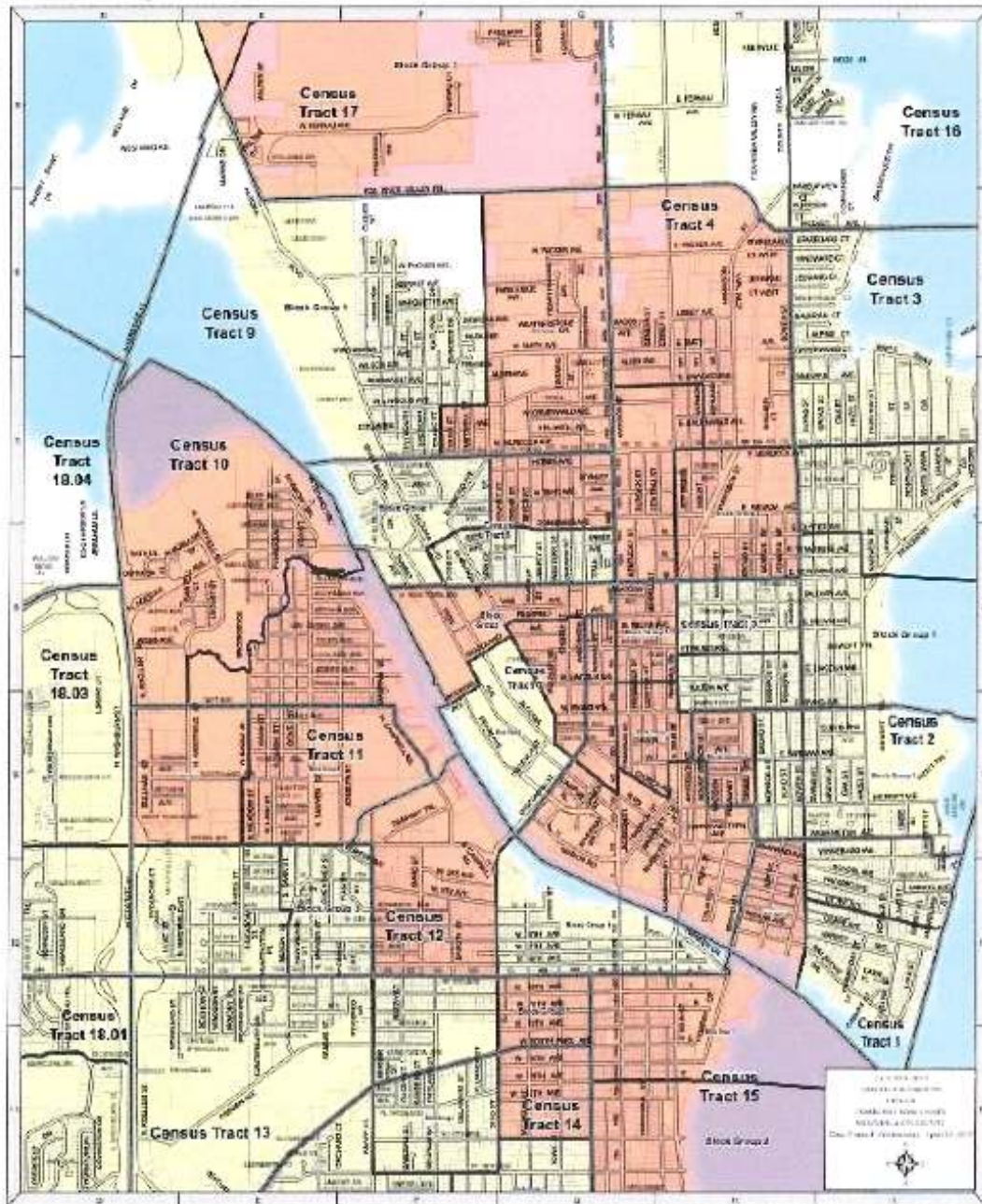
Council Member Poeschl stated he would vote 'present' as his employer was one of the beneficiaries of some of the funds that would be distributed.

MOTION: ADJOURN (Mugerauer; second, Herman)  
CARRIED: VOICE VOTE

The meeting adjourned at 9:27 p.m.

PAMELA R. UBRIG  
CITY CLERK

## EXHIBIT B – LMI CENSUS TRACTS & BLOCK GROUPS





## City of Oshkosh Neighborhood Associations

City of Oshkosh maps and data are intended to be used for general identification purposes only and the City of Oshkosh assumes no liability for the accuracy of the information. Those using the information are responsible for verifying accuracy. For full details, please go to [www.oshkosh.wisconsin.gov/GIS/faq.html](http://www.oshkosh.wisconsin.gov/GIS/faq.html)

## Grantee Unique Appendices

### CITIZEN PARTICIPATION PLAN

Per 24 CFR 91.105, the City of Oshkosh is required to adopt a citizen participation plan that sets forth the City's policies and procedures for citizen participation. The City of Oshkosh will approve this citizen participation plan on March 24, 2015 with the adoption of the 2015-2019 Consolidated Plan.

The Citizen Participation Plan provides for and encourages citizens to participate in the development of the consolidated plan, any substantial amendments to the consolidated plan and the performance report. The Plan is designed especially to encourage participation by low and moderate income persons, particularly those living in slum and blighted areas, and in areas where CDBG funds are proposed to be used, and by residents of predominantly low and moderate income neighborhoods. Actions will be taken to encourage the participation of all citizens, including minorities and non-English speaking persons, as well as persons with disabilities.

The City of Oshkosh encourages collaboration with the Oshkosh/Winnebago County Housing Authority and the residents of public and assisted housing developments during the process of developing and implementing the Consolidated Plan, along with other low-income residents of targeted revitalization areas in which the developments are located. The Department of Community Development strives to provide information to the Oshkosh/Winnebago County Housing Authority about consolidated plan activities related to its developments and surrounding communities.

#### Policies

1. Before the City adopts a consolidated plan, the City will make available to citizens, public agencies, and other interested parties information that includes the exact amount of assistance the City expects to receive (including grant funds and program income) and the range of activities that will be undertaken, including the estimated amount that will benefit persons of low and moderate income.

During project development, it is the City of Oshkosh's goal to minimize displacement of persons and to assist any person displaced. During redevelopment or rehabilitation projects, the City will work with citizens and property owners to present assistance available during the displacement period. Depending on the nature and scope of the project, this information will be made available in written and/or oral formats. City staff will be available to meet with those being displaced to continue any necessary discussion.

2. The City of Oshkosh will publish the proposed consolidated plan in a manner that allows cities, public agencies, and other interested parties a reasonable opportunity to examine its contents and submit comments. A summary will be published in the *Oshkosh Northwestern*, which is a newspaper of general circulation. Copies of the entire proposed consolidated plan will also be available for review at the Oshkosh Public Library (106 Washington Avenue, Oshkosh, 54901), at the City of Oshkosh Department of Community Development (Room 204, City Hall, 215 Church Avenue, Oshkosh,

54901), and online at [www.ci.oshkosh.wi.us](http://www.ci.oshkosh.wi.us) on the Department of Community Development's web page. In addition, the City will provide a reasonable number of free copies of the plan to citizens and groups that request it.

The notice will include information on the public hearing that is held, including location, date, and time.

3. The published notice in the *Oshkosh Northwestern* (described above) will initiate a 30-day period to receive comments from citizens on the consolidated plan.
4. During the preparation of the consolidated plan, the City of Oshkosh will consider any comments or views received at public hearings or by other means (telephone, email, etc.). A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, will be attached as an appendix to the consolidated plan.
5. Amendments to the Consolidated Plan. The City of Oshkosh will amend the plan if, during the program year, it is decided not to carry out an activity described in the annual action plan, propose a new project, or to substantially change the purpose, scope, location, or beneficiaries of an activity. For purposes of this Plan, the criteria for substantial is defined to be an action which increases or decreases an project category (Housing & Neighborhood Development, Public Services, etc.) by an amount equal to or in excess of ten percent (10%) of the current entitlement grant, or if the location of a project is changed in a manner that would deprive persons originally included of specific benefits. A public hearing to amend the action plan would be held before the Common Council. Public notice, as outlined previously in this Plan, would be used to provide citizens an opportunity to comment on the proposed amendment.

A period of not less than 30 days will be provided to receive comments on the substantial amendment before the amendment is implemented.

During the preparation of substantial amendments to the consolidated plan, the City of Oshkosh will consider any comments or views received at public hearings or by other means (telephone, email, etc.). A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, will be attached as an appendix to the substantial amendment to the consolidated plan

6. Performance Reports. A period of not less than 15 days will be provided in order to receive comments on the Consolidated Annual Performance and Evaluation Report (CAPER) prior to the submission of the report to HUD. The CAPER is due to HUD within 90 days of the end of the program year. The City of Oshkosh's program year ends April 30; therefore, the performance report is due to HUD by the end of July. Thus, this review period will typically be conducted during July.

Notice of the period to review and comment will be printed as a legal notice in the *Oshkosh Northwestern*. Copies will be available for review at the Department of Community Development and online at [www.ci.oshkosh.wi.us](http://www.ci.oshkosh.wi.us) on the Department of Community Development's web page. Comments or view of citizens will be accepted in both written and oral formats (at public hearings). A summary of these comments or views will be attached to the CAPER and submitted to HUD.

7. Public Hearings. The Department of Community Development will hold a minimum of two public hearings at two different stages of the program year to obtain citizen's views and to respond to questions and comments.

Notice will be provided a minimum of 10 days in advance of the public hearing and published in the *Oshkosh Northwestern*.

The hearings will address housing and community development needs, development of proposed activities, and review of program performance. The hearings will be held at times and locations convenient to potential and actual beneficiaries, and in locations accessible by persons with disabilities. Specifically, these hearings will be held in locations that are ADA accessible. Typically, these meetings will be held at City Hall, which is in the central business district and central to the majority of low and moderate income (LMI) census tracts and block groups and therefore in close proximity to CDBG-funded projects.

In instances where a significant number of non-English speaking residents can be reasonably expected to attend, the City of Oshkosh will make arrangements to provide interpreters.

8. Meetings. Meetings held regarding development of the consolidated plan, substantial amendments, annual action plan, and the performance report will be held in a place and at a time reasonably accessible.
9. Availability to the Public. The consolidated plan as adopted, substantial amendments, annual action plan, and the performance report will be available to the public in the following locations:
  - a. Department of Community Development
  - b. City of Oshkosh's website, [www2.ci.oshkosh.wi.us](http://www2.ci.oshkosh.wi.us) on the Department of Community Development, Planning Division web page.

The Department of Community Development will, upon request, make available these documents in a form accessible to persons with disabilities.

10. Access to Records. The City of Oshkosh will provide citizens, public agencies, and other interested parties with reasonable and timely access to information and records relating to the consolidated plan and the use of assistance in HUD programs.

11. Technical Assistance. Upon request and where applicable, technical assistance will be provided to groups representative of persons of low and moderate income that request such assistance in developing proposals for funding assistance under any of the programs covered by the consolidated plan. The assistance need not include the provision of funds to the groups.
12. Complaints. Citizens dissatisfied with any aspect of the consolidated plan, substantial amendments, annual action plan, and the performance report are advised to contact the Department of Community Development. If a citizen feels their complaint or grievance has not been satisfactorily addressed through discussion, the citizen may file a written statement. The Department of Community Development will provide a written response to the complaint within 15 working days. All written complaints or grievances, and the City's response will be forwarded to the Milwaukee Area Office of the U.S. Department of Housing and Urban Development for review. Complainants will also be provided with the name and address of a HUD representative whom they may contact directly.

**City of Oshkosh**  
Winnebago County, Wisconsin

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**Analysis of Impediments to Fair Housing Choice**

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Accepted and Approved: March 12, 2013

Prepared by: MSA Professional Services, Inc.  
with assistance from the City of Oshkosh Department of Community Development



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**Mayor & Deputy Mayor**

Burk Tower	Mayor
Steve Herman	Deputy Mayor

**Council Members**

Steve Cummings	Council Member
Bob Poeschl	Council Member
Debra Allison-Aasby	Council Member
Thomas Pech	Council Member
Jeff Hall	Council Member

**City of Oshkosh Community Development Department  
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*A special thank you to all of our focus group participants.*



MARCH 12, 2013

13-111

RESOLUTION

(CARRIED 7-0 LOST \_\_\_\_\_ LAID OVER \_\_\_\_\_ WITHDRAWN \_\_\_\_\_)

PURPOSE: ACCEPT & APPROVE 2012 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE AS AN ELEMENT OF THE COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM

INITIATED BY: COMMUNITY DEVELOPMENT

WHEREAS, as a community development block grant entitlement community, the City of Oshkosh is required to certify to the Department of Housing and Urban Development (HUD) that it will affirmatively further fair housing; and

WHEREAS, MSA Professional Services Inc. was hired to complete an Analysis of Impediments (AI) to Fair Housing Choice and said AI identifies fair housing concerns and impediments, and recommends planning strategies that the City can undertake to further fair housing within the community.

NOW, THEREFORE BE IT RESOLVED by the Common Council of the City of Oshkosh that the City hereby accepts the 2012 Analysis of Impediments to Fair Housing Choice, as prepared by MSA Professional Services Inc.

BE IT FURTHER RESOLVED that the Common Council affirmatively furthers fair housing opportunities within the City by approving the 2012 Analysis of Impediments, on file at the City Clerk's Office, as an element of the Community Development Block Grant Program, and authorizes the proper City officials to notify HUD of its acceptance and approval.

BE IT FURTHER RESOLVED that the proper City officials are authorized to take necessary steps to implement the recommendations to address impediments to fair housing in Oshkosh as identified in the 2012 Analysis of Impediments to Fair Housing Choice.

## I. Executive Summary

### I.1. Purpose

The purpose of the Analysis of Impediments to Fair Housing Choice (AI) is to make sure that the City of Oshkosh is working to affirmatively further fair housing. The basic purpose of the Fair Housing Act is to ensure that people are not denied housing opportunities because of their race, color, national origin, religion, sex, disability, or membership of another protected class. Fair housing impediments include actions or conditions that have the effect of unfairly restricting housing choices for people because of their protected class status, whether that effect is intended or unintended.

Ultimately, the AI identifies fair housing concerns and develops planning strategies that will be included in overall community planning and development. The AI planning process provides an opportunity to look at the “big picture” in regard to housing, discrimination, and community development issues.

### I.2. Overview of Study

In 2012, the City of Oshkosh hired MSA Professional Services to complete an AI for the City. The AI combines data available from a wide variety of sources, including population, demographic, economic and housing data from the US Census, American Community Survey, Home Mortgage Disclosure Act data, and the City of Oshkosh. This data review and analysis was combined with information gathered during a series of focus groups with housing and social service professionals.

Both the primary information that was gathered and the secondary data that was analyzed point to a similar set of at-risk groups and possible impediments.

### I.3. Impediments to Fair Housing Choice in the City of Oshkosh, WI

#### Administrative Impediments (Public and Private)

- Poor Understanding of Fair Housing Rights and Complaint Procedures
- Inadequate Support for Non-English Speaking Residents

#### Regulatory Impediments (Public)

- Misleading Fair Housing Ordinance

#### Quality Impediments (Private)

- Poor Condition of Housing Stock

#### Supply Impediments (Private)

- Inadequate Supply of Appropriate Housing for Residents with Disabilities

#### Transportation Impediments (Public)

- Lack of Adequate Transportation Options in Some Parts of the City

#### Financial Impediments (Private)

- Lack of Loans to Minorities

**I.4. Summary of Actions**

	Responsible Party	Timeline
<b>Actions to alleviate Administrative Impediments</b>		
<b>Increase knowledge and awareness of fair housing</b>		
Offer more outreach education on fair housing rights and complaints	Community Development Dept	Continual
Revise the City website to make fair housing info easier to find	City IT Department	Immediate
Revise outreach materials to include local examples of illegal discrimination	Community Development Dept	Short-Term
<b>Improve support for non-english speaking residents</b>		
Identify and fund translation services for use by City staff and landlords, etc.	Community Development Dept	Immediate
Include information about translation services in all outreach efforts and materials	Community Development Dept	Immediate
<b>Actions to alleviate Regulatory Impediments</b>		
<b>Update the City's Fair Housing Ordinance</b>		
Add to City Ordinance section 16 all protected classes identified by the State of Wisconsin, and definitions of each; remove the exemption for owner-occupied buildings; consider eliminating the Commission on Equal Opportunities in Housing	City Council	Short-Term
<b>Actions to alleviate Quality Impediments</b>		
<b>Improve the quality of rental housing in the City</b>		
Create a rental registry program that ensures proactive inspections of units for safety and code compliance	Community Development Dept	Short-Term
Enhance landlord and renter education materials and training to incorporate information about mold	Community Development Dept	Short-Term
<b>Actions to alleviate Supply Impediments</b>		
<b>Improve the supply of housing for residents with disabilities</b>		
Continue to offer home improvement loans to income-qualified residents to assist with the cost of accessibility retrofits, and emphasize "visibility"	Community Development Dept	Continual
Encourage the development of more units in the City that incorporate universal design principles. Create a pamphlet that describes universal design and identifies design support resources.	Community Development Dept, Plan Commission, City Council	Continual
Offer builder and developer training in universal design techniques and encourage their application in all new development.	Community Development Dept	Annual
<b>Actions to alleviate Financial/Affordability Impediments</b>		
<b>Improve transportation options in growth areas</b>		
Work with GO Transit to reduce headway on service to tracts 16 and 17	Community Development Dept, GO Transit	Short-Term
Ensure all new streets are complete streets, and improve pedestrian connectivity to the north side	Community Development Dept, Engineering	Short-Term
<b>Actions to alleviate Financial Impediments</b>		
<b>Improve the rate of home ownership among minority residents</b>		
Provide more credit and home-buying education to citizens, especially minority residents	Community Development Dept	Continual
Provide education and information for local lenders on predatory lending practices	Community Development Dept	Continual

## II. 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.

Fair housing is equal opportunity housing. It is the right for all people to obtain housing, of their choice, without discrimination. Provisions to affirmatively further fair housing (AFFH) are fundamental components of the Department of Housing and Urban Development's (HUD) community development and housing programs. These provisions stem from the Fair Housing Act<sup>1</sup>; a section of which required HUD to administer the department's programs in a manner that fulfills their AFFH obligation.

HUD maintains several Community Planning and Development Programs (CDP), though the City of Oshkosh participates in just one - the Community Development Block Grant (CDBG). As recipients of these funds, HUD requires the City of Oshkosh to work to affirmatively further fair housing. Although a grantee's AFFH obligations arise in connection to their receipt of federal funding, the obligations extend to all housing and housing-related activities in the grantee's jurisdictional area whether publically or privately funded.

To a large extent, *how* to fulfill the obligation to AFFH has never been defined statutorily; however, HUD defines it as requiring a grantee to:

- Conduct an analysis to identify impediments (AI) to fair housing choice within the jurisdiction
- Take appropriate actions to overcome any impediments identified through the analysis
- Maintain AFFH records.

The core component of fair housing law is the definition of illegal discrimination. The Federal Civil Rights Act and Fair Housing Amendments established protected classes: protected classes are groups of people who share a characteristic that historically has been used as the reason for discrimination. These characteristics have no relevance as to whether or not a person will make a good tenant or homeowner. As such, these groups are protected from housing discrimination under federal, state, and local laws. These different levels of government have different sets of protected classes; however, all three laws are applicable within the City of Oshkosh.

Table II-1 displays the protected classes at federal, state, and local levels.

<sup>1</sup> Title VIII of the Civil Rights Act of 1968 (also known as the Fair Housing Act) prohibits discrimination in the sale, rental, and financing of dwellings based on race, color, religion, sex, or national origin. Title VII has been amended since its original adoption in 1968 to include more protected classes. Refer to [www.hud.gov/offices/fheo/progdsc/title8.cfm](http://www.hud.gov/offices/fheo/progdsc/title8.cfm) for other laws which have fair housing components.



Table 11-1: Summary of Protected Classes

Protected Class	Federal (42 U.S.C 3602)	Wisconsin (Wis. Stat. 106.50(1))	Oshkosh (Sec 16-4 (A))
Race	✓	✓	✓
Color	✓	✓	✓
Religion	✓	✓	✓
Sex/Gender	✓	✓	✓
National Origin	✓	✓	✓
Handicap/Disability	✓	✓	✓
Familial Status	✓	✓	✓
Sexual Orientation		✓	
Marital Status		✓	
Ancestry		✓	✓
Lawful Source of Income		✓	
Age		✓	
Status as a victim of Domestic abuse, sexual abuse, or stalking (limited protections)		✓	

Certain housing types are exempted from discrimination prohibitions under Federal, State and local fair housing laws.

**Federal Exemptions:**

- Any single-family house sold or rented by an owner if they do not own more than three single-family houses at one time
- Owner-occupied housing, if the building has four or fewer units
- Religious organizations can limit the sale, rental or occupancy of dwellings, which it owns or operates for other than a commercial purpose to persons of the same religion, or from giving preference to such persons of the same religion, unless membership in such religion is restricted on account of race, color, or national origin.
- Private clubs can limit the rental or occupancy of lodgings which it owns or operates for other than a commercial purpose to its members or from giving preference to its members
- Housing primarily intended and operated for older persons, under certain conditions, may be restricted to persons over a certain age
- Persons convicted by any court of competent jurisdiction of the illegal manufacture or distribution of a controlled substance

**State Exemptions:**

- Housing primarily intended and operated for older persons, under certain conditions, may be restricted to persons over a certain age
- A person may exact different or more stringent terms or conditions for financing housing based on the age of the individual applicant for financing if the terms and conditions are reasonably related to the individual applicant
- The development of housing designed specifically for person with disabilities and preference in favor of persons with disabilities in relation to such housing
- Housing can be restricted from an individual whose tenancy would constitute a direct threat to the safety of other tenants or persons employed on the property or whose tenancy would result in

substantial physical damage to the property of others, if the risk of direct threat or damage cannot be eliminated or sufficiently reduced through reasonable accommodations.

- A family with “too many” people may be turned away, if a reasonable government requirement limits the number of occupants for the dwelling unit.
- Advertisements for a person of the same sex as the individual who seeks a person to share the dwelling unit for which the advertisement or written notice is placed

City of Oshkosh Exemptions:

- Owner-occupied housing, if the building has four or fewer units<sup>2</sup>
- The prohibition of discrimination based on familial status does not apply to housing for older persons

Impediments to fair housing choice are defined as:

- Direct impediments: any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, national origin, or other protected class which restrict housing choices or the availability of housing choices, and
- Indirect impediments: any actions, omissions, or decisions which have this effect

Any policies, practices, or procedures that may appear neutral but operate to deny or adversely affect the availability of housing to a person may be considered an impediment.

To the best extent possible, the following Analysis of Impediments to Fair Housing Choice defines the existence, nature, extent, and causes of fair housing problems within Oshkosh, and the resources available to solve them. It is the goal of this document and the process by which it was created to identify any issues within the City of Oshkosh that are preventing persons from having access to housing of their choice without illegal discrimination.

<sup>2</sup> Note that the exemption for owner-occupied buildings with four or fewer units is not consistent with State law.

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### III. Oshkosh Background Information

The following section summarizes background data for the City of Oshkosh. Much of the data was derived from secondary sources, consisting primarily of the U.S. Census and the American Community Survey.

#### III.1. A word of caution about the data

Caution should be used when interpreting the data from secondary sources. The United States has transitioned from the Census long-form to the American Community Survey (ACS). The majority of the data that the American Community Survey collects is from a sample of the total population; and therefore, is subject to both sampling errors (deviations from the true population) and non-sampling errors (human and processing errors). The ACS is released every year and covers all of the social, economic, housing, and demographic questions that previously were covered by the Census long-form. The 2010 Census only collected data on gender, age, race, ethnicity, relationship, and whether the respondent owned or rented their home.

Unlike the Census, which attempts to take a snapshot of the population on April 1<sup>st</sup>, the

ACS provides rolling estimates over a period of 1-5 years, depending on community size.

Oshkosh gets one-year estimates. Because the data is “smoothed out” over the time period, it is near impossible to pinpoint specific changes that may have occurred during the time period. The majority of the data in this document is from the ACS 2011 1-Year Estimate. Because this data is only an estimate, the ACS data may not accurately represent housing conditions within the City, especially at the census tract level. Due to the fundamental differences in data, Census data and ACS data cannot be compared with each other. When comparing ACS data, it is necessary to take the margin of error (MOE) into account. Numbers that may appear to be different may not actually be *statistically significantly* different. It is important to note the source of any of the data herein and understand the caveats that accompany it.<sup>3</sup>

While data collection is a necessary part of the process to prepare an AI, it is also important to remember that the AI is meant to be a practical document that identifies impediments to fair housing choice and suggests a systematic plan to remove them. For the most part, the

#### Quick Facts

66,083	Population of Oshkosh
26,138	Total households
9.5	% minority
\$19,683	Per capita income
19.7%	% individuals below poverty
11.8%	% of families below poverty
35.0	% of units that are multi-family
43.8	% of units renter-occupied
26.2	% home costs exceeding affordability
48.6	% renter costs exceeding affordability

Source: U.S. Census; ACS 2011 1-Year Est.

<sup>3</sup>For more information on the ACS and how to appropriately interpret the data, visit [www.census.gov](http://www.census.gov)

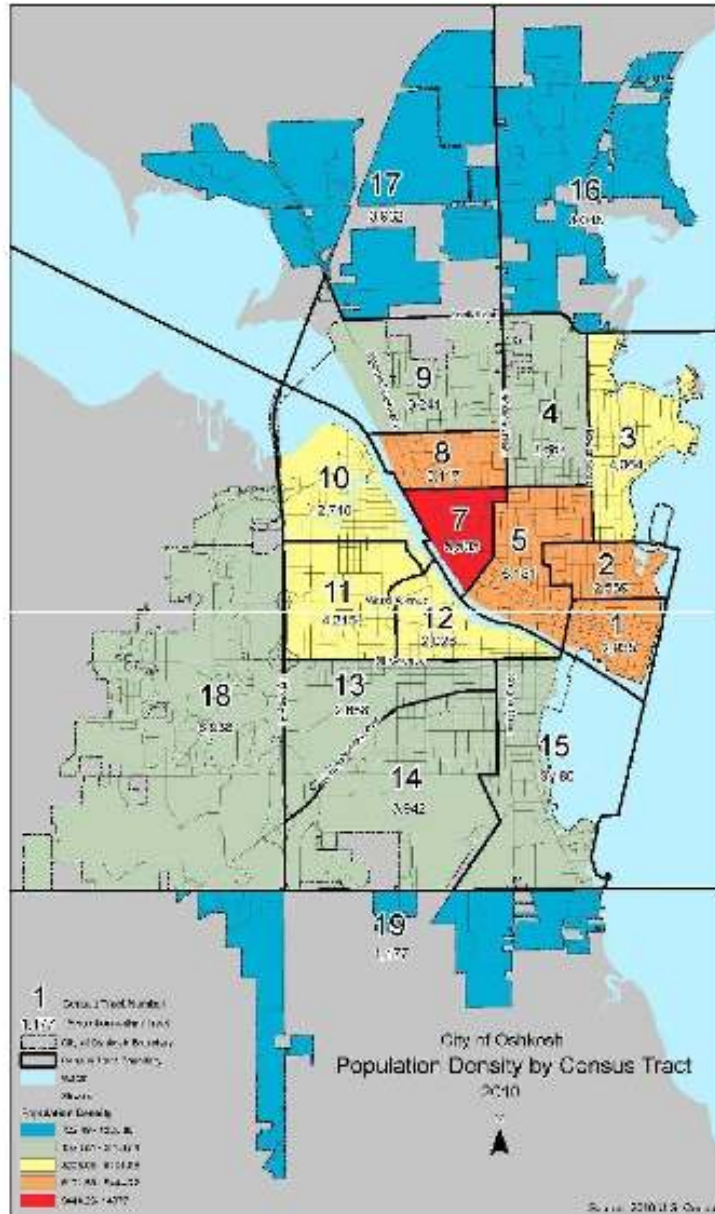
community is aware of impediments, and those that are not clearly presented in the data will be identified through the focus group process described in a subsequent section of this document.

### III.2. Demographics

The population in the City of Oshkosh has grown continuously over the last 30 years, with the highest change in population of 14.4% from 1990 to 2000. According to the 2010 census, the population in the City of Oshkosh is 66,083. This is approximately 39.6% of the population of Winnebago County, down from 42.4% in 2000. Percentages of Winnebago County population residing in surrounding municipalities, including Appleton, Neenah, Menasha, and Winneconne, have remained fairly constant over the last 30 years. This indicates a shift in population from the urban core to the suburbs.

Figure III-1 (following page) shows the population density by Census tract for the City of Oshkosh. The most densely populated tract in the City is CT 7 near the University of Wisconsin-Oshkosh. Tracts 1, 2, 5 and 8 are the next most densely populated tracts.

Figure III-1: Population Density by Census Tract

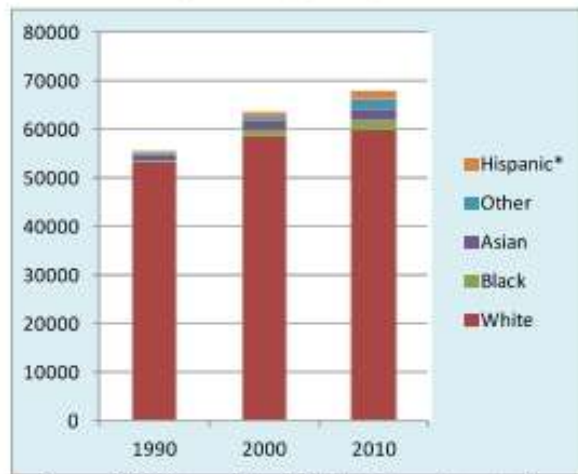


Source: 2010 U.S. Census

Figure III-2 tracks the racial mix of the City of Oshkosh over the past 20 years. As the overall population grows, the percentage of the population that identifies as a minority is also increasing

(from 3.4% in 1990 to 9.5% in 2010). According to the 2010 Census, the City of Oshkosh is approximately 90.5% White, 3.1% Black, 3.2% Asian, 3.2% Other, and 2.7% Hispanic. Hispanic persons can be of any race. Those identifying as "Other" are the fastest growing group (from 0.88% in 1990 to 3.2% in 2010), with those identifying as Hispanic are the second fastest growing group. Hmong and Laotian accounted for 2.4% (1493) of Oshkosh's total estimated population in 2000 (from "The Remaking of a City: Oshkosh Wisconsin- Revised/Updated by Al Felice 11/16/10 <http://diversitycontact.wordpress.com/2010/11/16/the-remaking-of-a-city-oshkosh-wisconsin-revisedupdated/>)

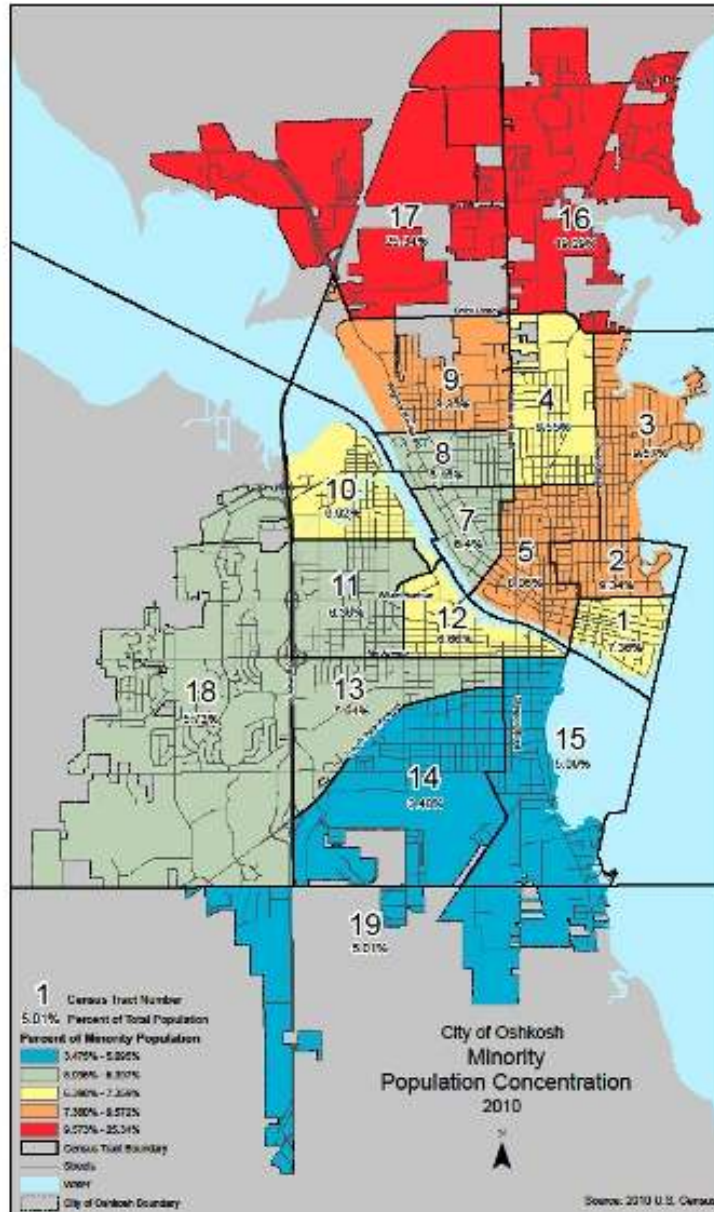
Figure III-2: Population by Race



Source: 2010 Census, City of Oshkosh Comprehensive Plan  
 \* Hispanic can be of any race

Figure III-3 (following page) shows minority concentration by Census Tract for the City of Oshkosh. As illustrated, the northern two census tracts – 16 and 17 – have a disproportionately high concentration of minority residents, each more than double the 9.5% average minority population.

Figure III-3: Minority Concentration by Census Tract



Source: 2010 US Census



Table III-1 shows the percentage of people in the City of Oshkosh with a disability. As might be expected, the age group with the greatest prevalence of disability is those residents aged 65 and older (35%). This data affirms the assumption that it is the elderly population in greatest need of accessible housing.

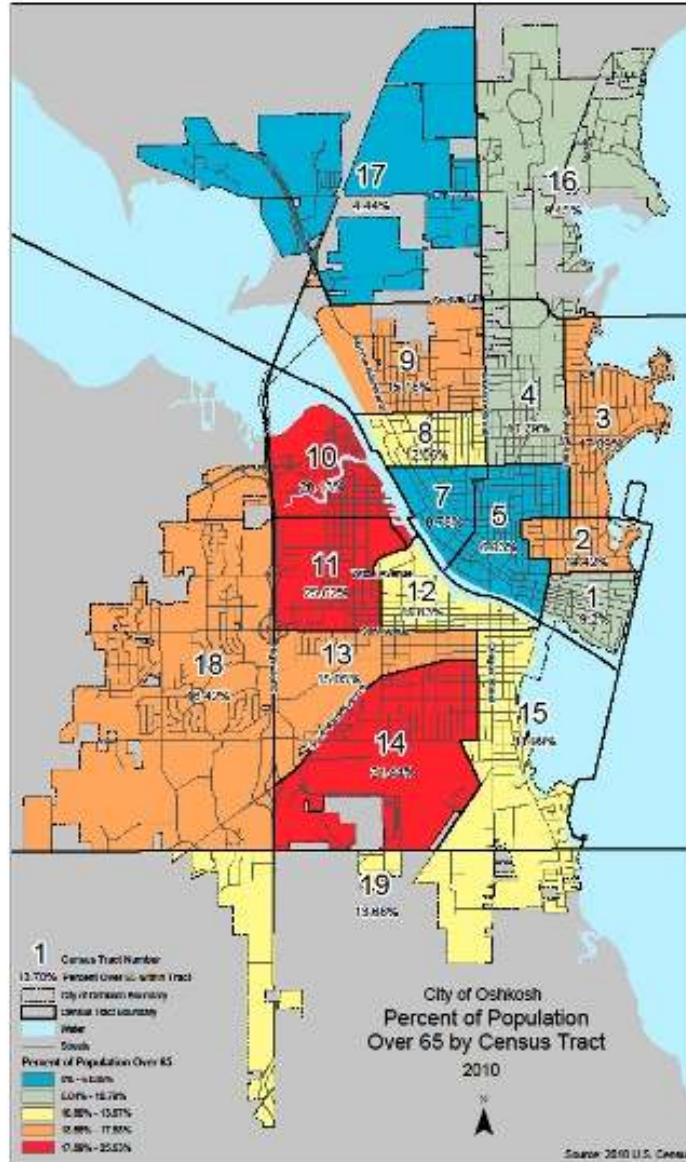
Table III-1: Percent of Population with a Disability

Age Group	Percent
Under 5 years	0.00%
5 to 17 years	5.30%
18 to 64 years	9.60%
65 years or older	38.60%

Source: ACS 2011 1-Year Estimate

Figure III-4 (following page) indicates the geographic distribution of residents over age 65. While 12.9% of residents were over age 65 in 2010, there are three tracts where this older population exceeds 20% - CTs 10, 11 and 14. Based on the prevalence of disability in this population, these tracts have an elevated need for disability accommodations.

Figure III-4: Percent of Population over age 65 by Census Tract

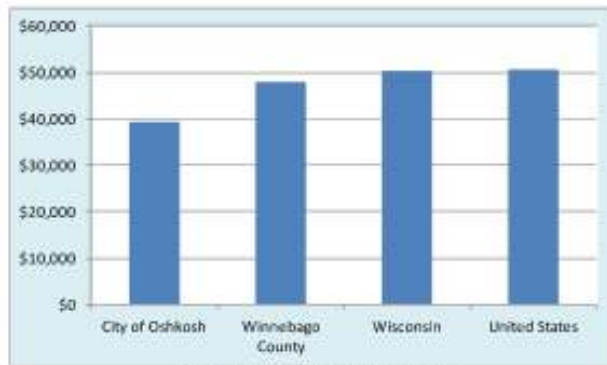


Source: 2010 US Census

### III.3. Income and Poverty

According to the 2011 American Community Survey, the median household income in the City of Oshkosh was \$39,387. While we cannot directly compare ACS data with previous Census data, this does show an increase in household income within the City. Despite this, the median household income in the City is 17.5% less than the median household income in Winnebago County (\$47,763) and 22% less than the State of Wisconsin (\$50,395). See Figure III-5 to see how the City compares with Winnebago County, the State of Wisconsin and the United States.

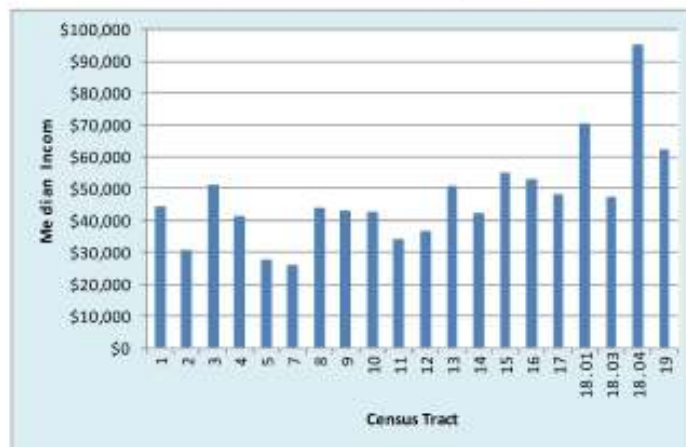
Figure III-5: Median Income in the Past 12 Months (in 2011 Inflation-Adjusted Dollars)



Source: 2011 ACS 1-Year Estimates

Figure III-6 and Figure III-7 (following page) show that the lowest median incomes are in the central city and the north side. Census Tracts 5 and 7 have the lowest median incomes when compared to the rest of the City. These tracts have a high student population. Figure III-8 (page 16) highlights those tracts (2, 5, 7, 17) that have a median income lower than 80% of the City median income. Note that these include a tract on the north side, CT 17, which does not have a large student population.

Figure III-6: Median Household Income by Census Tract



Source: 2006-2010 ACS 5-Year Estimate

Figure III-7: Map of Median Household Income by Census Tract

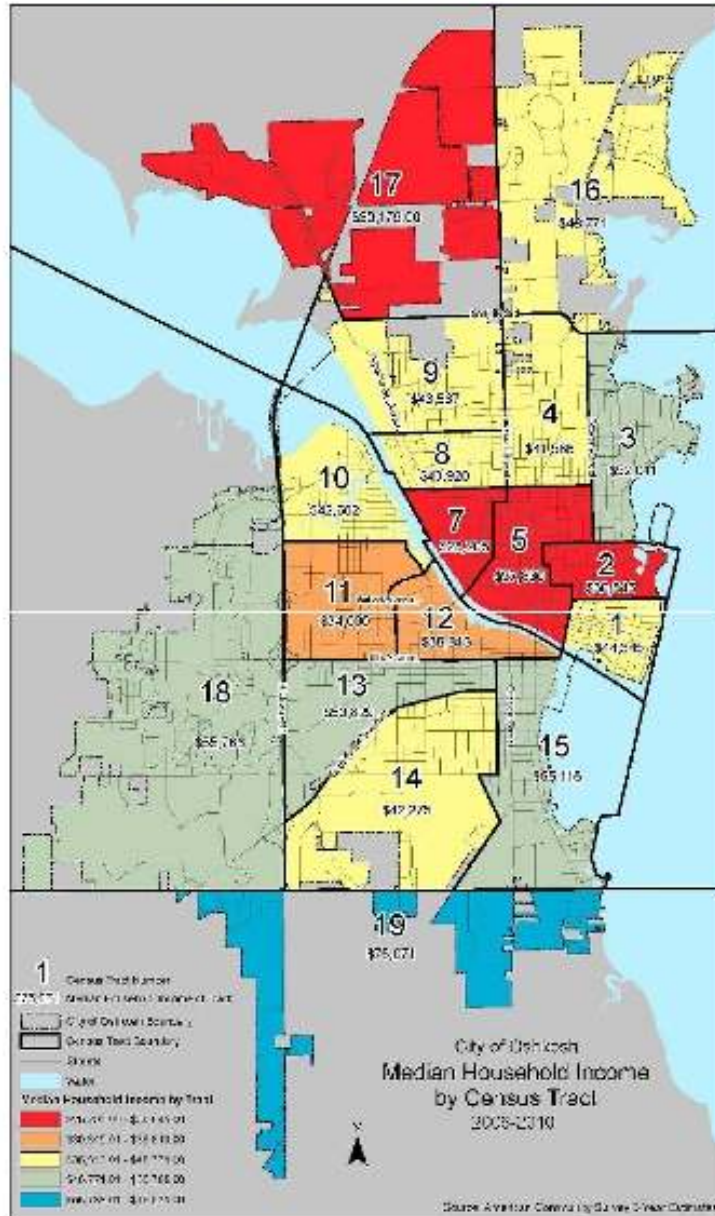
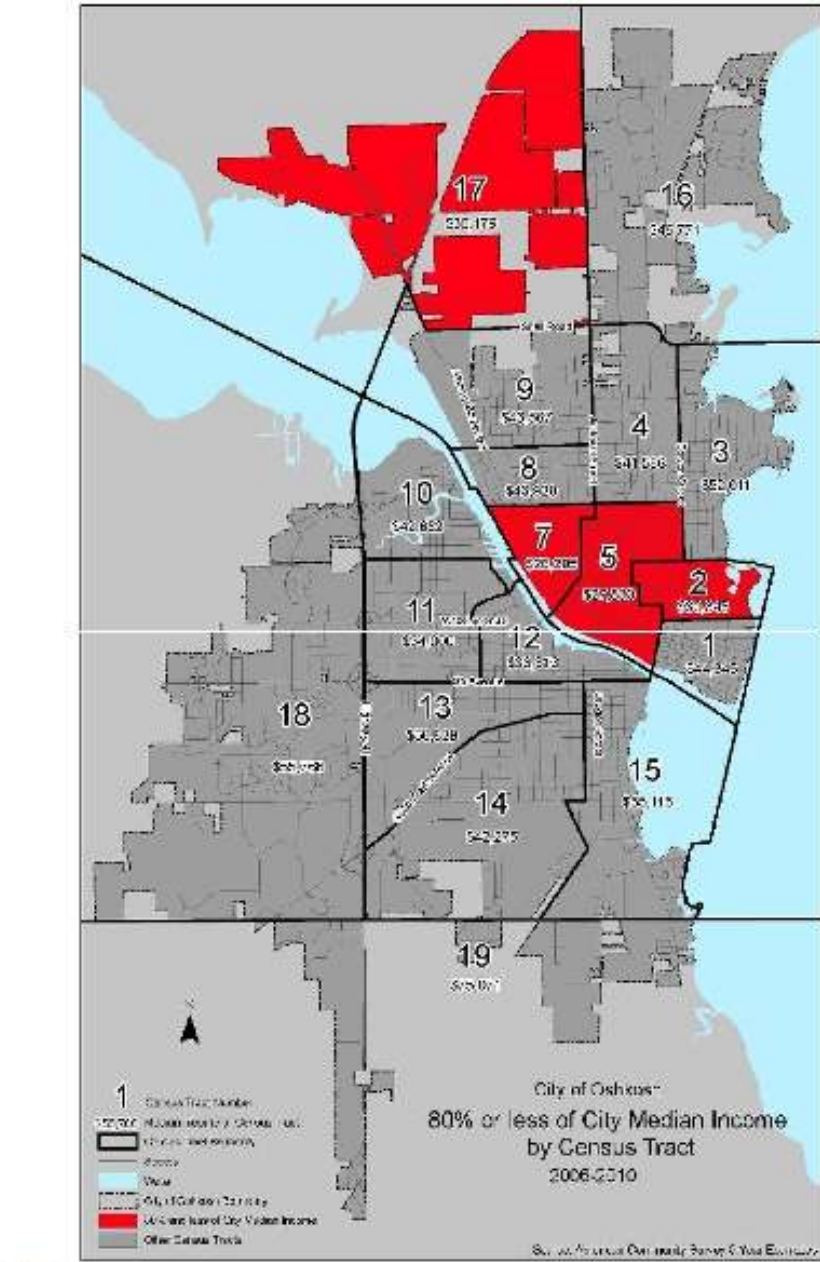


Figure III-8: 80% or Less of City Median Income by Census



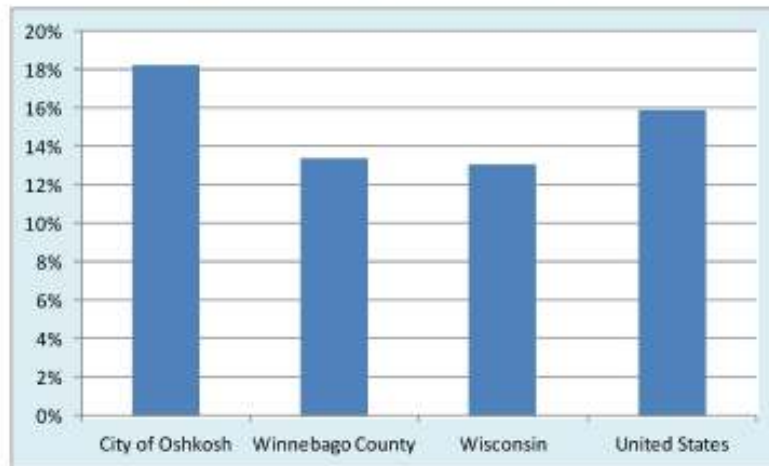
Tract

Source: 2006-2010 American Community Survey

According to Figure III-9, the City of Oshkosh has a relatively high percentage of poverty. The number of individuals in the City that are currently below the poverty line is 18.2%; compared to 13.4% of the individuals in Winnebago County, 13.1% of the individuals in Wisconsin, and

15.9% nation-wide.

Figure III-9: Poverty Status in the Past 12 Months



Source: 2011 ACS 1-Year Estimates

Approximately 9.7% of the families in the City are below the poverty line, while 8% of the families within the County are below the poverty line, as indicated in Table III-2.

Table III-2: Income and Poverty Trends within the City of Oshkosh

	1990	2000	2011 (1 Year Est.)
Per Capita Income	\$ 11,843	\$ 18,964	\$ 20,013
Median Family Income	\$ 31,773	\$ 48,843	\$ 54,532
Median Household Income	\$ 25,168	\$ 37,636	\$ 39,387
% Individuals Below Poverty Line	12.6%	10.2%	18.2%
% Families Below Poverty Line		5.2%	9.7%

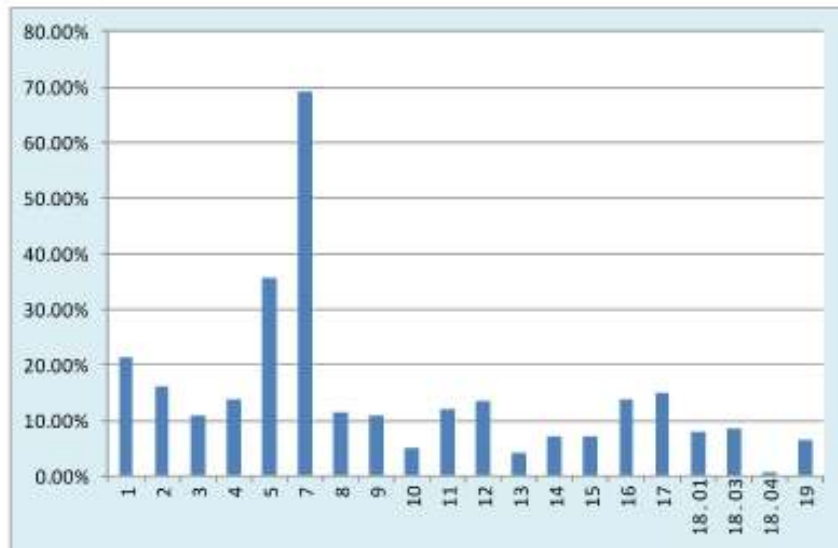
Source: ACS 2011 1 Year Estimate

Figure III-10 shows the percent of persons below the poverty level by Census tract. The two Census Tracts with the greatest percentage of individuals beneath the poverty line are CT 5 and CT 7. Both of the tracts have high student populations. Students often do not have a job, but receive money from sources that will not be reflected in the Census (e.g. their parents paying

their rent, etc). This does not mean that non-students living in these tracts do not also fall below

the poverty line. The next three Census Tracts with the highest percentage of individuals beneath the poverty line are CT 1, CT 2 and CT 17.

Figure III-10: Percent of Persons below Poverty by Census Tract

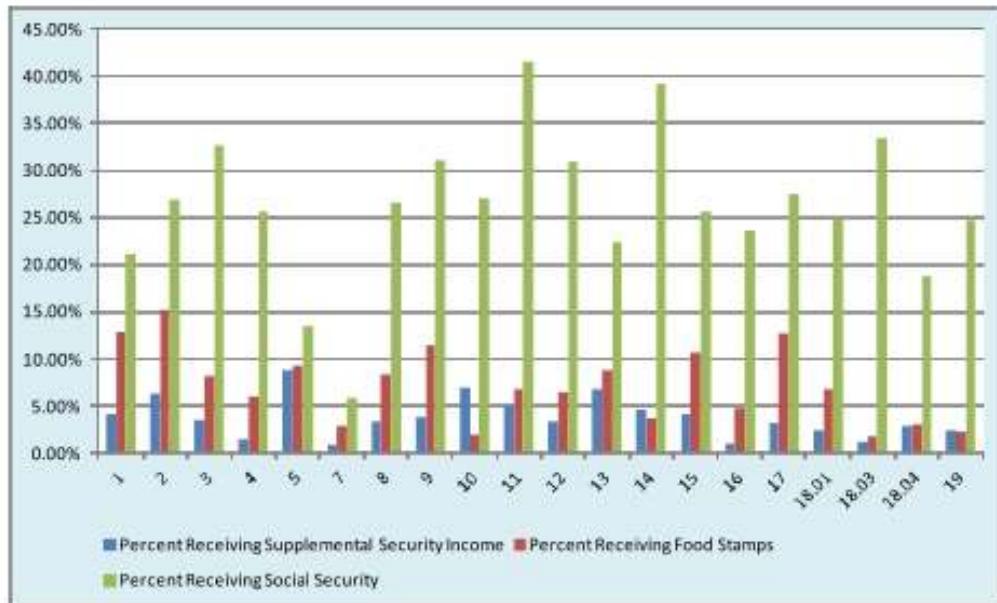


Source 2006-2010 ACS

While CT 5 and CT 7 are consistently ranked at the bottom of the City’s Census tracts for some income and poverty indicators, it is interesting to look at the percentage of individuals who are receiving food stamps (SNAP benefits) and Supplemental Security Income in other tracts. See Figure III-11: Social Security, Food Stamps and Supplemental Security by Census Tract.

Food stamp and SSI programs are often used as proxies to measure levels of poverty. As Figure III-11 shows, the tracts with more than 10% using food stamps include CT 1, CT 2, CT 9, CT 15 and CT 17, suggesting that it is these Census tracts have a high percentage of individuals who are truly struggling with poverty. In contrast, CT 7, which has a reported 70% of residents with income below the poverty level, has less than 3% of residents receiving food stamps, among the lowest in the city.

Figure III-11: Social Security, Food Stamps and Supplemental Security by Census Tract

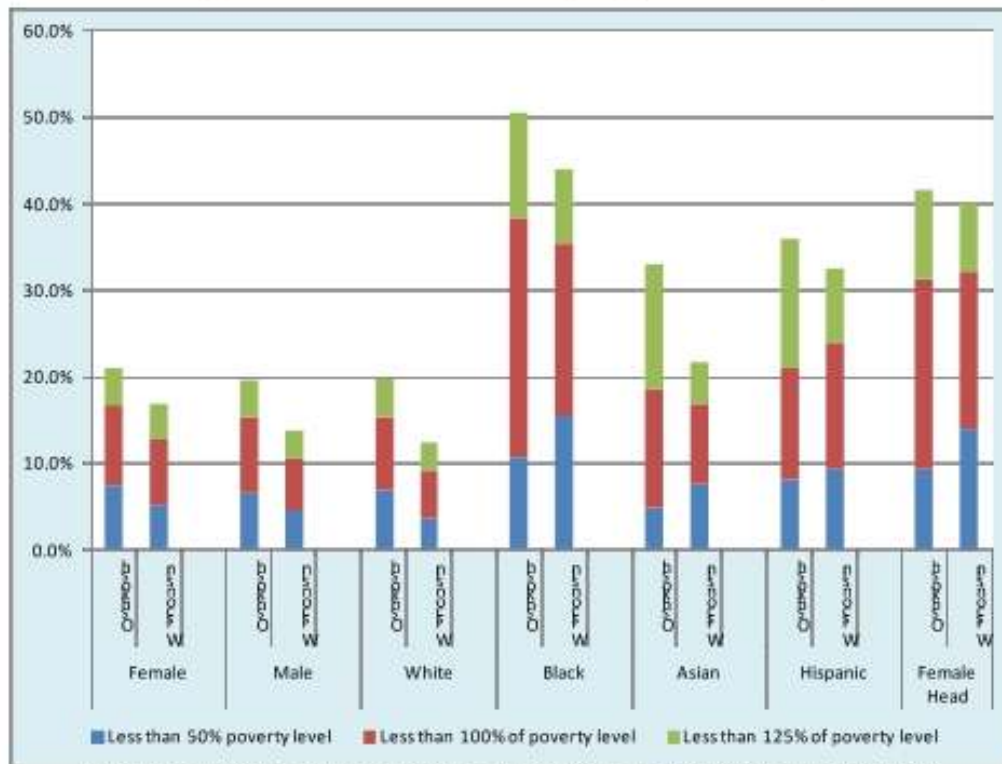


Source: 2006-2010 ACS



Figure III-12 shows the poverty status of specific racial, gender, and household type subsets of the Oshkosh population, with the corresponding statewide data for reference. As expected based on the overall poverty data, each subset of the local population has a higher percentage of people living with poverty than statewide. Consistent with the statewide data, African Americans, Asians, Hispanics, and female-headed households all have notably higher rates of poverty than the community average. These findings indicate that low-income residents of Oshkosh are disproportionately non-white and/or female-led households. As such, they are therefore more likely to experience any negative housing outcomes associated with low incomes than the majority population.

Figure III-12: Selected Characteristics of People at Specific Levels of Poverty



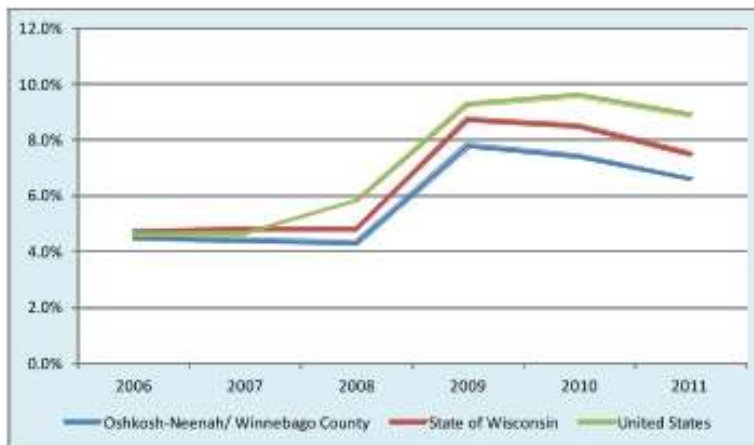
\* The data is cumulative. Everyone who is less than 50% is also less than 100% and less than 125%  
 Source: 2005-2009 ACS

**III.4. Economic Background**

While this document focuses primarily on housing trends within the City, it is important to also mention various employment and transportation trends which directly and indirectly affect the ability of all persons to have access to safe, decent, and affordable housing.

The State of Wisconsin lost more than 137,000 jobs during the economic downturn that overwhelmed the nation from 2007-2009. Figure III-13 shows the unemployment rate for the Oshkosh-Neenah/Winnebago County MSA has fared better than the State and the nation as a whole. The City of Oshkosh appears to be recovering more quickly than Winnebago County and the State of Wisconsin. Table III-3 shows the largest employers in the City of Oshkosh. The presence of health care, university, and military-contract manufacturing employers on this list is consistent with the relatively low unemployment in the area.

Figure III-13: Unemployment Rates 2006-2011



Source: Wisconsin Department of Workforce Development

Table III-3: Largest Employers in the City of Oshkosh

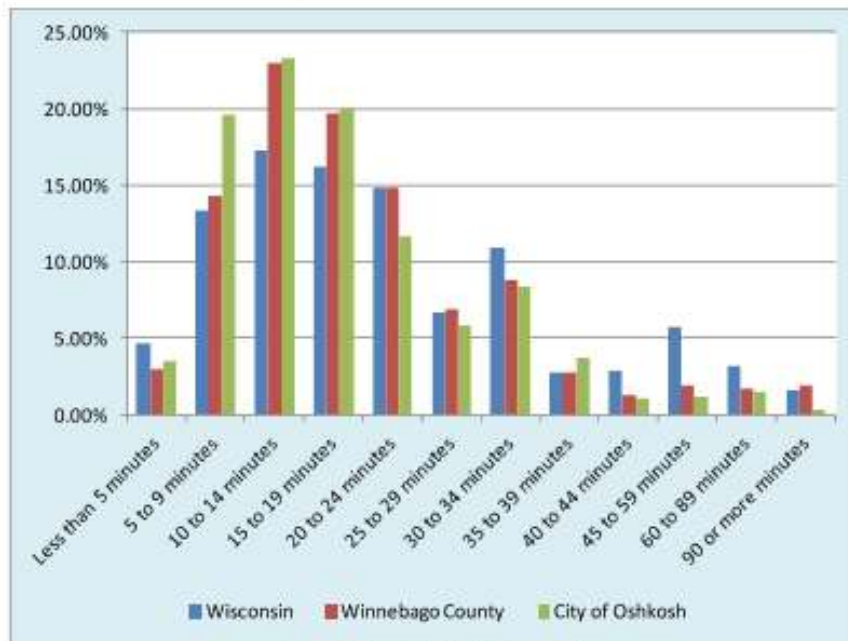
Employer	Number of Employees
Oshkosh Corporation	> 1,000 Employees
Bemis (all Oshkosh locations)	> 1,000 Employees
University of Wisconsin Oshkosh	> 1,000 Employees
Oshkosh Area School District	> 1,000 Employees
Winnebago County	500-999
Aurora Medical Center & Medical Group	500-999
US Bank	500-999
Miles Kimball Company	500-999

Affinity- Mercy Medical Center 500-999

Source: Wisconsin Department of Workforce Development

Figure III-14 shows that in general, Oshkosh city residents have a commute that is shorter than the commutes typical to both Winnebago County and the State of Wisconsin. This indicates that there are employment opportunities within the city available to local residents and travel times within the city are relatively short.

Figure III-14: Travel Time to Work



Source: 2011 ACS 1-Year Estimate

### III.5. Transportation Options and Commute

Because the City of Oshkosh is a relatively small city, the size minimizes the significance of the spatial relationship between resident and job opportunities. Nevertheless, it is imperative that the City continue to provide transportation options, especially for lower income and disabled residents.

#### Transit

According to the Oshkosh Transit Development Plan (July 2011), there were 3,217 average daily boardings (ADB). The ADB is down 7.2% from 2004. GO Transit (rebranded in 2012) consists of 9 fixed routes and 3 school routes offering transportation throughout the area, with most routes operating Monday through Saturday. Roughly 52% of GO Transit riders use the bus service to get to work or school.

The routes with the highest daily boardings are routes 9 (Ninth Avenue), 6 (UWO/North Sawyer), 2 (Bowen Street) and 4 (North Main). These routes constitute 57.6% of all riders. In 2009, there were 1,077,426 unlinked riders<sup>4</sup>. GO Transit also offers paratransit services for individuals with disabilities.

Figure III-15 shows the GO Transit route map with overlays that include Census Tract outlines, public housing locations, and housing voucher recipient locations. This map shows that 30-minute bus service is available throughout most Census tracts and parts of the City, with the exception of CT 16 and CT 17, and most of the identified low-income housing sites are on or within walking distance of one of the routes. The line that serves CT 16 and CT 17 is the “Neenah” line, offering service between Oshkosh and Neenah. This route does not deviate into the neighborhood from the Jackson St. arterial (except at Logan Drive), and, unlike the other routes, it operates on a 90-minute schedule instead of a 30-minute schedule.

Figure III-15: GO Transit Route Map with 2012 Public Housing Sites (yellow dots) and Housing Voucher Recipients (green dots)



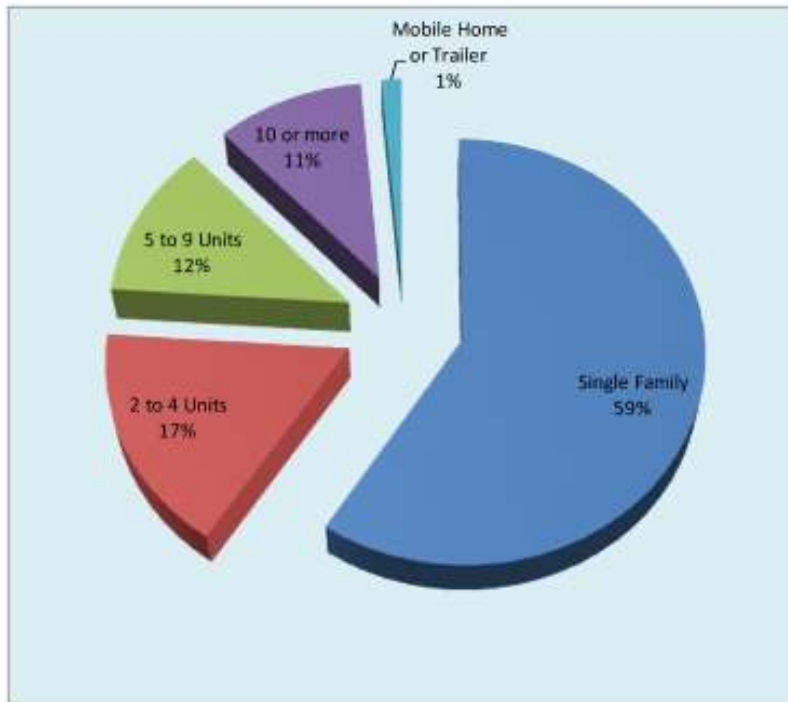
Source: Oshkosh/Winnebago County Housing Authority, GO Transit

<sup>4</sup> Unlinked passengers represent the total number of boardings including all transfers on the system.

### III.6. Housing Stock

The Census defines a household as all persons occupying a housing unit whether related or unrelated. 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. Most of the housing stock in the City of Oshkosh (59% of all units) is single-family residential. Forty percent of housing within the City is multi-family, meaning two or more units in the same structure (this includes duplex houses). One percent of the housing stock is mobile homes. See Figure III-16 for a graphic breakdown of housing unit types in the City of Oshkosh.

Figure III-16: Housing Unit Type in the City of Oshkosh (% with Each Number)



Source: 2011 ACS 1-Year Estimates

Persons not living in households are classified as living in group quarters. Group quarters include non-institutional settings such as dormitories and institution settings such as prisons. According to the 2010 US Census, 11% of the City's population lived in group quarters. Fifty-four percent of those living in group quarters were institutionalized in correctional facilities for adults and skilled nursing facilities. University housing for students was the largest noninstitutionalized population. Table III-4 shows the breakdown of group quarters in the City of Oshkosh.

Table III-4: Group Quarters Population by Group Quarters Type

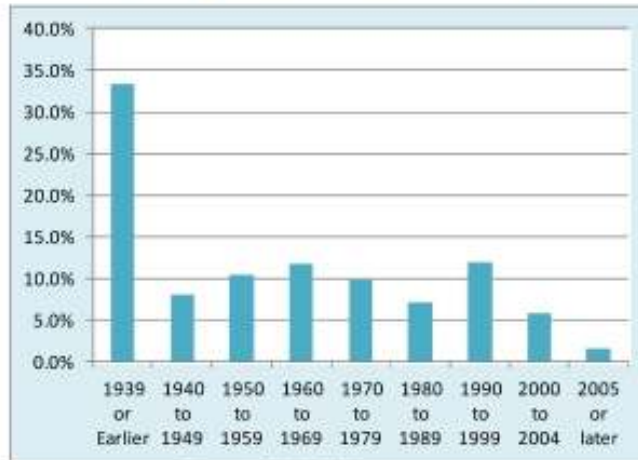
	Number	Percent
<b>Institutionalized Population</b>	<b>4,056</b>	<b>54%</b>
Correctional Facilities for Adults	2,888	71%
Nursing facilities/Skilled-Nursing Facilities	974	24%
Other Institutional Facilities	194	5%
<b>Noninstitutionalized Population</b>	<b>3,464</b>	<b>46%</b>
College/University Student Housing	3,195	92%
Other Noninstitutionalized Facilities <sup>5</sup>	269	8%
<b>Total Population Living in Group Quarters</b>	<b>7,520</b>	<b>100%</b>

Source: 2011 ACS 1-Year Estimates

Figure III-17 shows that a substantial portion of the housing stock in Oshkosh was built before World War II - almost 30% of the housing was built before 1939. Older housing is in many cases affordable as compared to newer construction, but older homes also tend to have higher repair and maintenance costs and also higher energy costs due to inadequate or inefficient building and heating systems.

<sup>5</sup> "Other Noninstitutionalized Facilities" include emergency shelters, group homes for adults, residential treatment centers, religious group quarters, and workers; group living quarters.

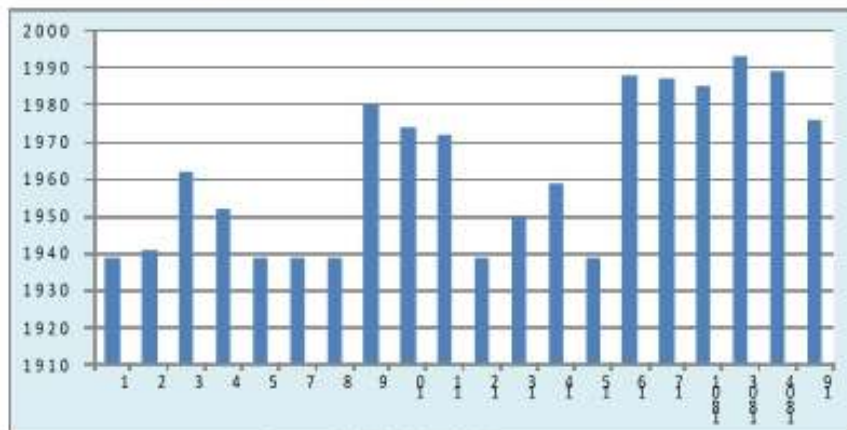
Figure III-17: Year Residential Structure Built



Source: 2011 ACS 1-year estimate

Figure III-18 shows the median age of housing stock, by tract. It illustrates a natural pattern of growth and development – tracts with a median build date of 1939 (1, 2, 5, 7, 8, 12, 15) are close to the center of the city, and those with the youngest median build dates are the tracts at the periphery.

Figure III-18: Median Year Structure Built by Census Tract



Source: 2006-2010 ACS 5-year estimate

Figure III-19 shows that the age of the housing stock has some correlation to the median income in each census tract, consistent with the common trend of higher-income residents choosing to live in newer, larger homes in younger neighborhoods that typically have newer, higher-performing schools.

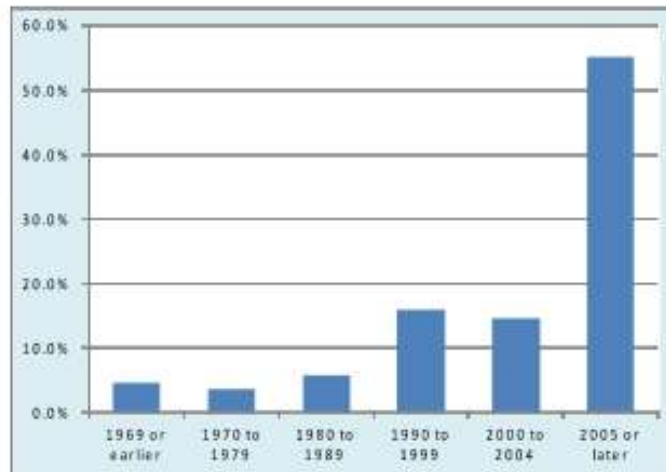
Figure III-19: Year Built Compared to Median Income by Census Tract



Source: 2006-2010 ACS 5-year estimate

Figure III-20 shows that while much of the housing stock is more than 70 years old, most residents have lived in their homes less than 5 years.

Figure III-20: Year Moved to Current Home



Source: 2011 ACS 1-Year Estimates

The City of Oshkosh has a high ratio of renters to home owners. Approximately 44% of occupied housing units in the City were renter-occupied as of the 2010 Census; see Figure III-21. By comparison, approximately 35% of occupied housing units in the United States were renter-occupied that year.



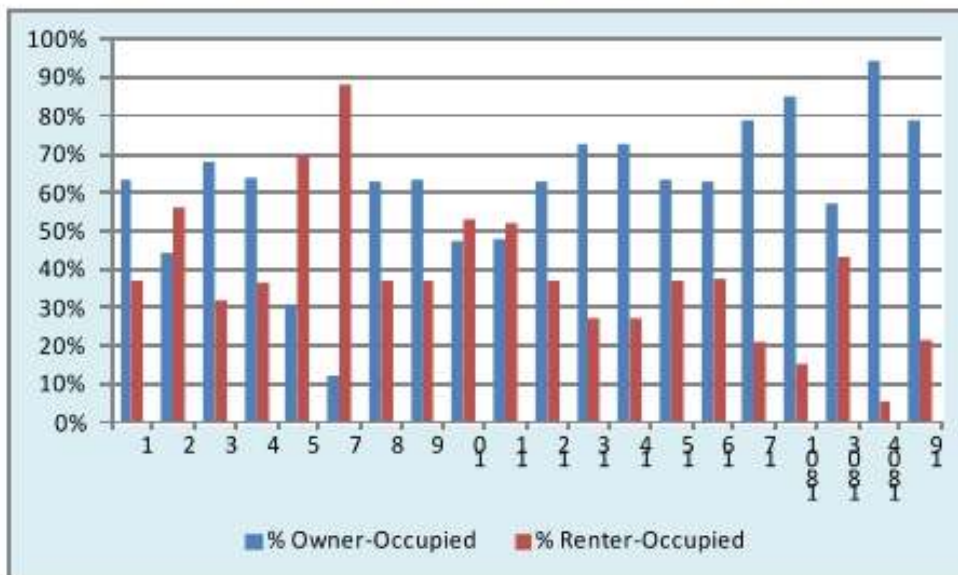
Figure III-21: Owner-Occupied vs. Renter Occupied Housing Units



Source: 2011 ACS 1-Year Estimate

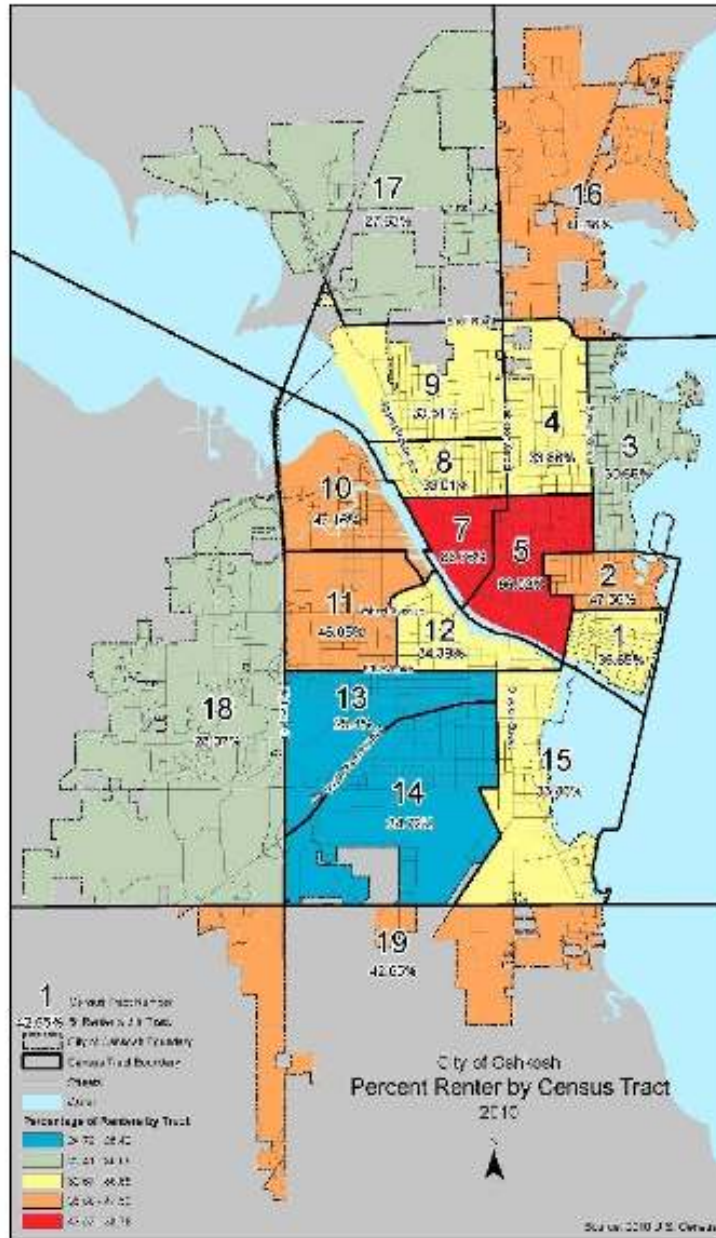
Figure III-22 shows the percentage of owner-occupied housing units vs. renter-occupied housing units per census tract. The tracts with the highest percentage of renter-occupied housing units are tracts 5 (69%) and 7 (88%). The University of Wisconsin-Oshkosh is located in tract 7, at the edge of tract 5, and so these numbers reflect the prevalence of student rentals in these areas. Other tracts with more than 50% rentals include 2, 10, and 11. See Figure III-23 (following page) for a map showing the percentage of renters per census tract.

Figure III-22: Percentage of Owner-Occupied vs. Renter-Occupied Housing Units by Census Tract



Source: 2010 US Census

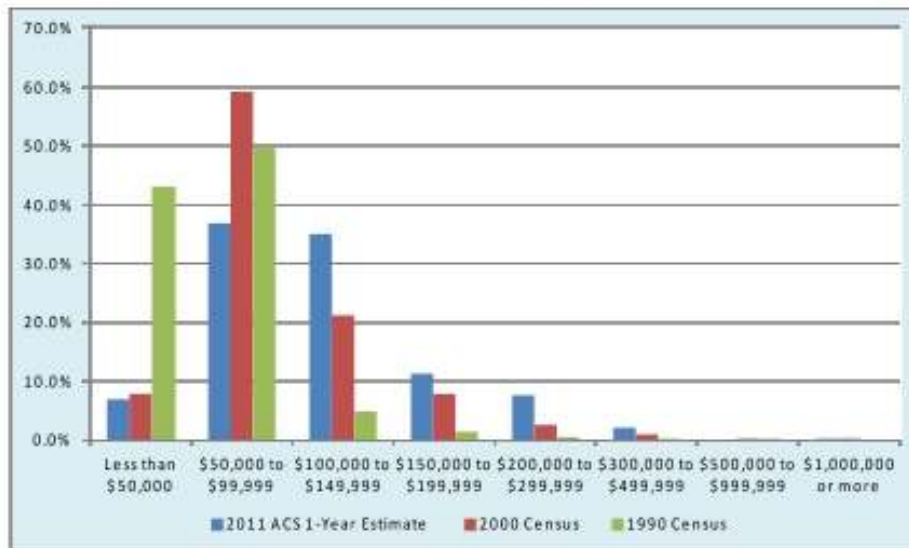
Figure III-23: Percent Renters by Census Tract



Source: 2010 U.S. Census

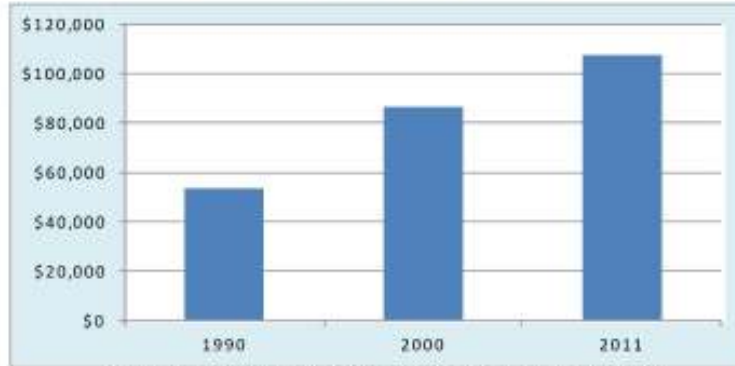
Most of the housing stock in the City of Oshkosh is valued at less than \$150,000, as indicated in Figure III-24. Figure III-25 shows that the median value of housing has steadily increased since 1990. Figure III-26 (following page) illustrates the relationship between age and value of housing, indicating that older units tend to be of lower value than more recently constructed units. There is likely a unit size component to this also, as unit square footage increased steadily from the 1940's to the 2000's. Older units, while apparently more affordable, are also less likely to be handicap accessible, more likely to need repairs, and more likely to have poor energy performance.

Figure III-24: Housing Value



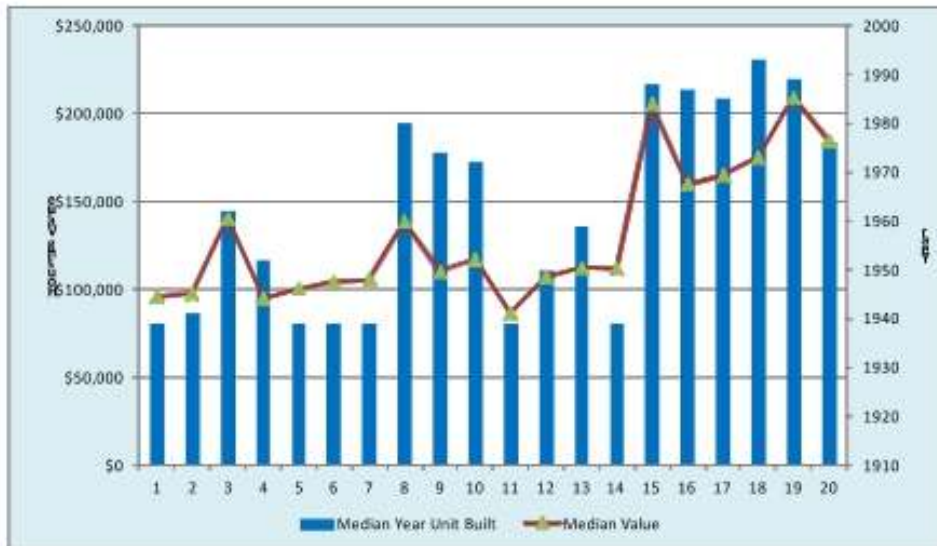
Source: 2011 ACS 1-Year Estimate

Figure III-25: Median Value from 1990-2011



Source: 1990 Census, 2000 Census, 2011 ACS 1-Year Estimates

Figure III-26: Median Housing Value Compared to Median Year Built by Census Tract



Source: 2006-2010 ACS

### III.7. Housing Affordability

#### Fair Market Rents

Each year, HUD releases Fair Market Rents (FMR) for metropolitan areas. FMRs are primarily used to determine standard payment amounts for the Housing Choice voucher program (Section 8); however, they can also be an illuminating measure of the affordability of the rental market. FMR must be high enough to permit a selection of units and neighborhoods, but this must be

balanced against the need to serve as many low-income families as possible with a fixed program

budget. Table III-5 shows that the Oshkosh-Neenah metro area is relatively affordable compared to other metro areas in the state.

Table III-5: HUD Fair Market Rent

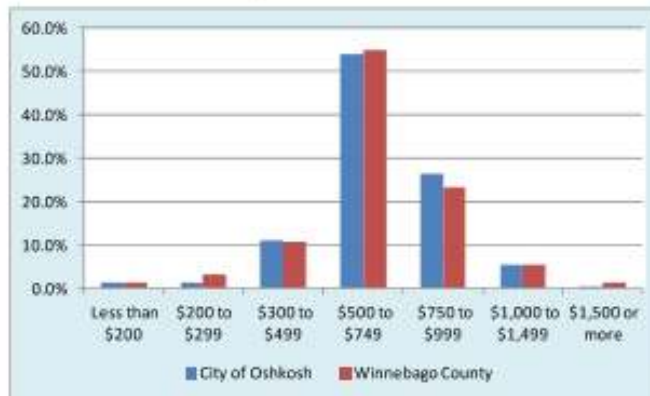
Metro	Efficiency	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	Average
Eau Claire, WI	\$442	\$514	\$658	\$969	\$1,004	\$717
Green Bay, WI	\$425	\$517	\$685	\$978	\$1,005	\$722
<b>Oshkosh-Neenah, WI</b>	<b>\$477</b>	<b>\$516</b>	<b>\$669</b>	<b>\$891</b>	<b>\$1,185</b>	<b>\$748</b>
Racine, WI	\$539	\$543	\$733	\$961	\$980	\$751
Milwaukee-Waukesha-West Allis, WI	\$535	\$659	\$828	\$1,056	\$1,142	\$844
Kenosha County, WI	\$523	\$624	\$801	\$1,163	\$1,219	\$866
Madison, WI	\$614	\$734	\$889	\$1,226	\$1,366	\$966

Source: FY 2013 Fair Market Rent Documentation System-HUD

**Gross Rent**

Rent levels are also tracked and reported, using different data and methodology, by the US Census. The 2011 1-Year ACS Estimates show that the majority of rents in the City (54.1%) fall between \$500 and \$749; see Figure III-27. This is on par with Winnebago County as a whole, indicating that the city is no more or less affordable than the surrounding area. The median rent for Oshkosh of \$639 is approximately equal to Winnebago County overall (\$636).

Figure III-27: Gross Rent



Source: 2011 ACS 1-Year Estimate

Figure III-28 shows gross rents compared to median income by census tract. Census tracts 5 and 7 are noteworthy – they have the highest gross rent and the lowest median income in the City. This likely reflects the fact that student rent is often subsidized by parents, and students are often

choosing to share rental units (sometimes beyond the limits of City ordinances) to distribute the cost, allowing property owners to keep the rents high. In contrast, Tract 18.01, which has relatively few rental units (28% of all units) has the lowest gross rent and second highest median income in the City.

Figure III-28: Median Gross Rent by Median Income by Census Tract



Source: 2006-2010 ACS 5-Year Estimates

**Cost Burden**

In general, housing is considered ‘affordable’ if housing costs do not exceed 30% of the household’s monthly income. According to the American Community Survey 2011 1-Year Estimates, many of Oshkosh’s residents are unable to find housing that meets the ‘affordable’ threshold; see Figure III-6. Specifically, 52.5% of renters and 28.3% of home-owners are not meeting the affordability threshold.

Table III-6: Selected Home Costs as a Percentage of Income

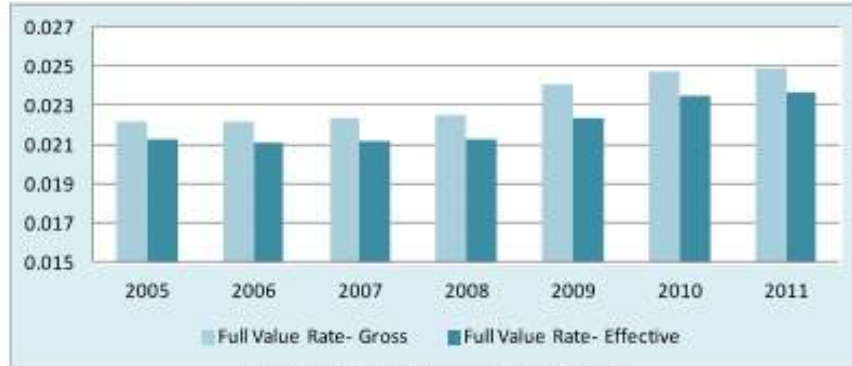
Selected Monthly Owner Costs as a Percentage of Household Income	Percent	Gross Rent as a Percentage of Household Income	Percent
		Less than 15%	8.60%
Less than 20%	39.0%	15.0% to 19.9%	21.40%
20% to 24.9%	17.4%	20% to 24.9%	9.80%
25% to 29.9%	15.2%	25% to 29.9%	7.70%
30% to 34.9%	9.6%	30% to 34.9%	4.70%
35% or more	18.7%	35% or more	47.80%
Not computed	39	Not computed	519

Source: 2011 ACS 1-Year Estimates

**Taxes**

Tax rates in the City of Oshkosh have increased slightly every year since 2005. Figure III-29 shows that the property tax rate has increase from \$21.29 per \$1,000 of value in 2005 to \$24.85 per \$1,000 of value in 2011 for a total increase of \$3.56 per \$1,000, or a difference of \$534 on a home valued at \$150,000.

Figure III-29: Oshkosh Property Tax Rate Trends 2005-2011



Source: Wisconsin Department of Revenue

Taxes in the City of Oshkosh are comparable with surrounding municipalities. Oshkosh pays more in property taxes than the Cities of Appleton (Outagamie County only) and Fond du Lac. The City of Neenah pays roughly the same amount as the City of Oshkosh and Menasha and Omro pay slightly higher taxes than Oshkosh. See Figure III-30.

Figure III-30: Comparison of Property Taxes between the City of Oshkosh and Surrounding Municipalities



Source: Wisconsin Department of Revenue

<sup>a</sup> The City of Appleton's tax rate is only for the portion of the City in Outagamie County and the City of Menasha's tax rate is only for the portion of the City in Winnebago County. Both cities are in two counties.

### III.8. Mortgage/Loan and Foreclosure Information

It is important to acknowledge the recent and continuing turmoil in real estate and financial markets. While the collapse of the subprime market in 2008 was that 'straw that broke the camel's back,' the groundwork of the ensuing foreclosure crisis had been brewing for decades. As long ago as when WWII was winding down, there have been patterns of refusing to extend

credit to low-income communities, especially communities of color. This practice, known as

redlining, opened up the floodgates for high-cost credit institutions to move in and prey upon

disadvantaged populations.

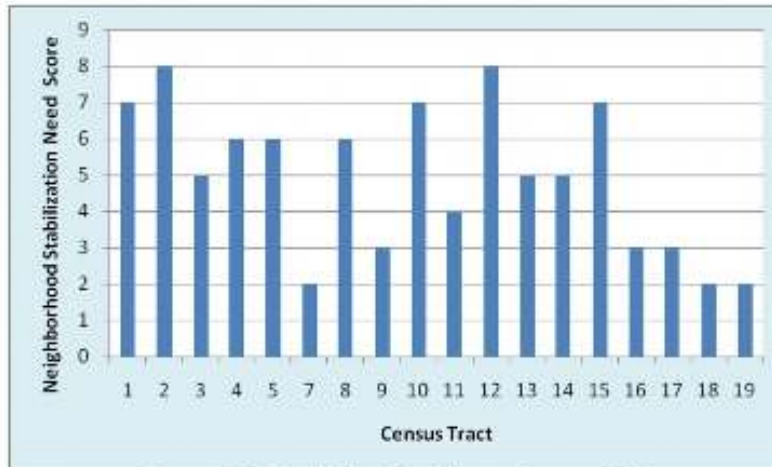
Today the effects of deregulations, predatory lending, and the subprime meltdown are still a factor as homes are lost to foreclosure. According to the HUD Neighborhood Stabilization Program, Census Tracts 2 and 12 had the greatest need as of the 2<sup>nd</sup> Quarter of 2010, based on HUD's methodology<sup>7</sup>. See Figure III-31 for a comparison of foreclosure scores by census tract. Note that these scores are on a scale of 1-20, and the Wisconsin threshold for NSP round 3 funding was a score of 11. Approximately 20% of Wisconsin census tracts were identified as "in need", including none in Oshkosh. However, this is a factor of the amount of NSP money available. In rounds 1 and 2, more money was available and tracts 1, 2, 4, 5, 12 and 15 were eligible due to their foreclosure risk scores.

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<sup>7</sup> HUD calculated need for neighborhood stabilization funding based on a formula that incorporated three factors in each census tract: A) Rate of Subprime Loans. This is measured with HMDA data on high cost and high leverage loans made between 2004 and 2007. These data are available at the Census Tract (neighborhood) level. B) Increase in Unemployment Rate between March 2005 and March 2010. These data are from the BLS Local Area Unemployment Statistics, at the city and county level. C) Fall in Home Value from Peak to Trough. Home value data at the Metropolitan Area level is available quarterly through March 2010 from the Federal Housing Finance Agency Home Price Index.



Figure III-31: Neighborhood Stabilization Score by Census Tract



Source: HUD Neighborhood Stabilization Program, 2010

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

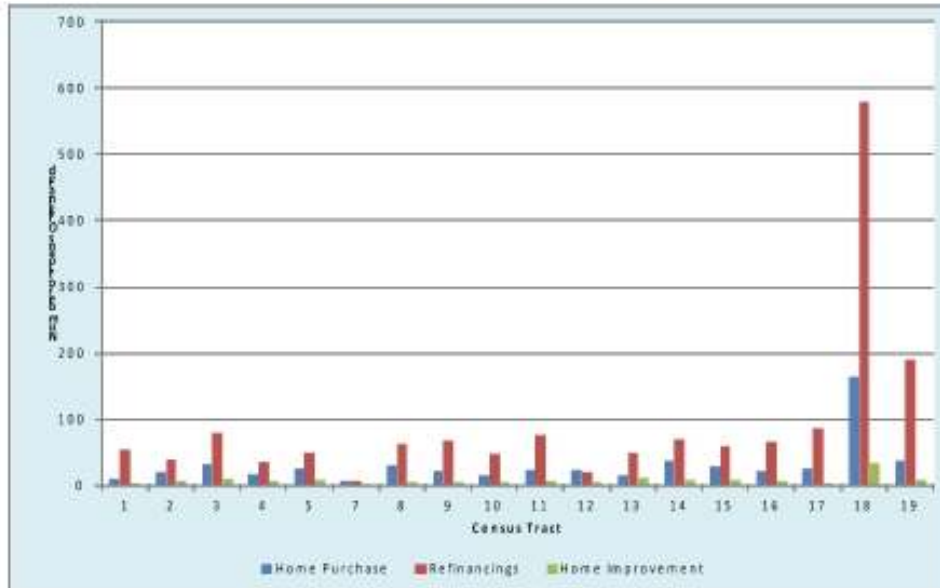
housing needs of their communities, helping public officials in distributing public-sector

investments, and identifying possible discriminatory lending patterns. This regulation applies to certain financial institutions, including banks, savings associations, credit unions, and other mortgage lending institutions. Institutions that meet certain minimum thresholds must disclose data regarding the disposition of applications for mortgage and home improvement loans in addition to data regarding loan originations and purchases. They are required to identify the race, sex, and income of loan applications, as well as the physical location of the subject property in census geography. Appendix C contains complete HMDA data for the City of Oshkosh.

For the purpose of this analysis, HMDA data was reviewed to identify and evaluate lending practices in relation to income, race, and geographical location. Unfortunately, information on both race and geographical location simultaneously is not provided due to the small sample size at the tract level. While large amounts of data are available and extensive analyses are possible, for the purpose of this analysis it is important to identify trends that may be affecting the City's

ability to provide fair housing to all its residents. This analysis focuses on loans for 1-4 unit residences.

Figure III-32: Geographic Location of Loans



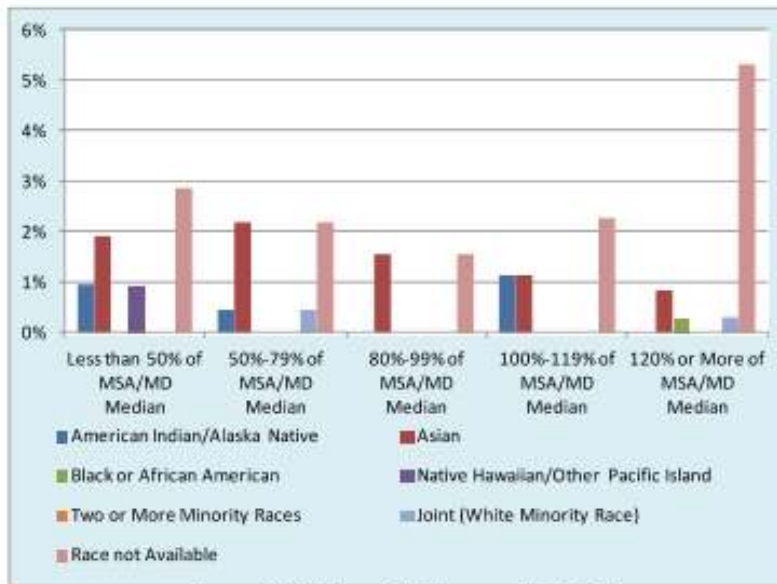
Source: HMDA Data, 2011 (Aggregate Table 1)

Figure III-32 shows that the most prevalent loan throughout the City is a refinancing loan. In particular, Census Tracts 18 and 19 have the highest number of refinancing loans. Census Tracts 14, 18 and 19 have the most home purchase loans (this includes both conventional loans and FHA, FSA/RHS & VA loans). There are not very many home improvement loans anywhere in the City, indicating that either the money or the will to fix up the aging housing stock is not available.

Figure III-33 indicates the percentage of all conventional home loans that originated to minority applicants in the Oshkosh metro area in 2011. The intent of this analysis is to consider how this outcome compares to the size of these populations in the area, and Figure III-34 (following page) provides that point of reference. The largest minority groups in the area are Asians (~2.4% of the total population), African Americans (~1.9%) and people of mixed race (~1.6%). By comparison, the percentages of loans originated to these minority groups in 2011 ranges from 0% to just over 2% within each of the income ranges shown. Given the small sample size, there is ample opportunity for minor data errors to have a large effect on these outcomes. With that caveat in mind, it does appear that minorities are somewhat less likely to secure home loans in the area than white residents. The most notable observation is the complete lack of loans to African Americans in all but the highest of the income ranges, and this is noteworthy especially

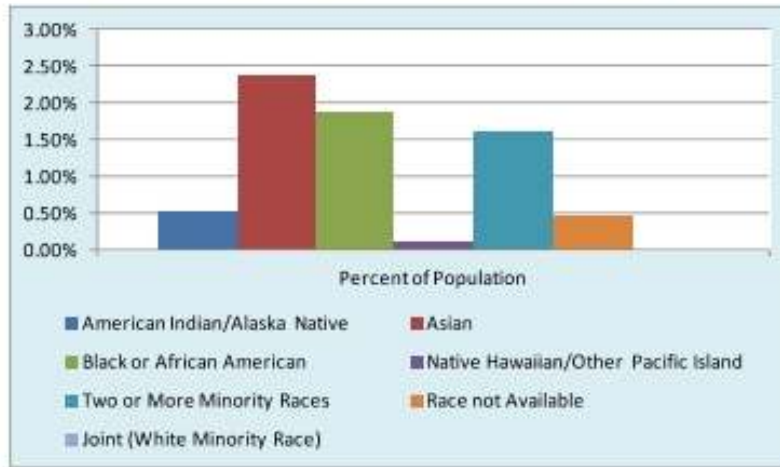
because of the disproportionate percentage of low-income residents that are African American (see Figure III-12). This lack of loans originated suggests lesser access to capital to enable home ownership, but it is not possible to identify the cause from this data. A review of the data in HMDA Aggregate Table 5-2 (see Appendix C) confirms that there were also very few applications for loans, mitigating the concern that African Americans are applying for loans but being turned down.

Figure III-33: Percentage of Loans Originated by Minority Status



Source: HMDA Data, 2011 Aggregate Table 5-2

Figure III-34: Percent of Minority Population in the Oshkosh-Neenah MSA



Source: 2011 ACS 1-Year Estimate

When examining the rest of the HMDA data, there are several other trends which indicate that minority and low-income persons are struggling to secure credit:

- Minorities are more likely to apply for loans through Fannie Mae, Ginnie Mae, Freddie Mac, than they are to apply through commercial banks, savings banks, insurance companies, mortgage banks or finance companies (See HDMA Aggregate Table 3-1 in the Appendix C).
- When examining conventional loan applications in 2011, there were a total of 1,267 applicants, of which only 12% were minority races. Only 13% of the conventional loans applied for were by

Hispanics. Roughly 72% of those loans were originated (See HDMA Aggregate Table 4-2 in

Appendix C).

## IV. Fair Housing Profile

### IV.1. Fair Housing Programs and Activities

#### Overview

Fair housing activities in Oshkosh are coordinated by the Planning Services Division of the Community Development Department. Planning Services staff manage the Community Development Block Grant (CDBG) program, including:

- Planning and reporting activities required as a condition of CDBG funding (including this study),
- Distribution of funds to various entities that support neighborhood, housing and low to moderate income needs in the community; and
- Distribution of funds directly to property owners through the Housing Rehabilitation Loan Program

Over the past six years, CDBG funds have been utilized for two primary purposes: fair housing education and housing rehabilitation

Table IV-1: Fair Housing and Housing Rehabilitation funding by the City of Oshkosh (2007-2012)

	Fair Housing	Housing Rehabilitation	Total
2007	\$10,000.00	\$ 355,132.00	\$ 365,132.00
2008	\$ 9,625.00	\$ 289,180.00	\$ 298,805.00
2009	\$10,000.00	\$ 287,156.00	\$ 297,156.00
2010	\$10,000.00	\$ 330,397.00	\$ 340,397.00
2011	\$10,000.00	\$ 366,587.00	\$ 376,587.00
2012	\$10,000.00	\$ 436,751.00	\$ 446,751.00
Totals	\$59,625.00	\$ 2,065,203.00	\$ 2,124,828.00

Source: City of Oshkosh CAPER

#### Education Efforts

The City outsources most of its outreach and education efforts to the Fair Housing Center of Northeast Wisconsin (FHCNW). FHCNW conducts fair housing presentations (geared toward residents) and training sessions (geared toward housing industry professionals). Both City staff and FHCNW distribute education materials.

Housing rights education is also provided by the University of Wisconsin Extension. The Winnebago County Extension office offers the Rent Smart program, which was most recently conducted in September 2012 in the City of Menasha. Fair housing rights and the complaint process were one aspect of this two-part class conducted over two nights.

#### CDBG Program

Each year, the City of Oshkosh prepares an Action Plan for its usage of Community Development Block Grant (CDBG) allocations for the U.S. Department of Housing and Urban Development (HUD). The City also prepares a 5-Year Consolidated Plan to identify needs over a period of time. Assistance is directed primarily to census tracts with high rates of low-to-

moderate-income (LMI). Most of these LMI tracts are located within the oldest areas of the central city.

The City's current 5-Year Consolidated Plan (2010-2014) identifies three types of priority areas to allocate funding. These priority areas are as follows:

**Priority 1 Areas** include the "Near East Neighborhood," the "Broad/Bay Area Neighborhood," the "North Campus Neighborhood" and the "Near Southside Neighborhoods." These neighborhoods have the following characteristics.

- Higher renter-occupied rates than the rest of the City.
- High percentage of homes built before 1940 with median year structures lower than the City's median year structure of 1959.
- The median value of owner-occupied units ranges from 4% to 28% lower than the City's overall median value of \$85,500.

**Priority 2 Areas** includes a significant portion of the City's central area including Census Tracts 5, 7 and 12 as well as portions of Tracts 2, 4, 8, 9 and 15. These areas have the following characteristics.

- Higher renter-occupied rates than the rest of the City.
- Almost all of the housing stock in the area was constructed before the citywide median year of 1959.
- The median value of owner-occupied units ranges from 4% to 28% lower the City's overall median value of \$85,500.
- Most of the streets in this area are in need of major road repair.

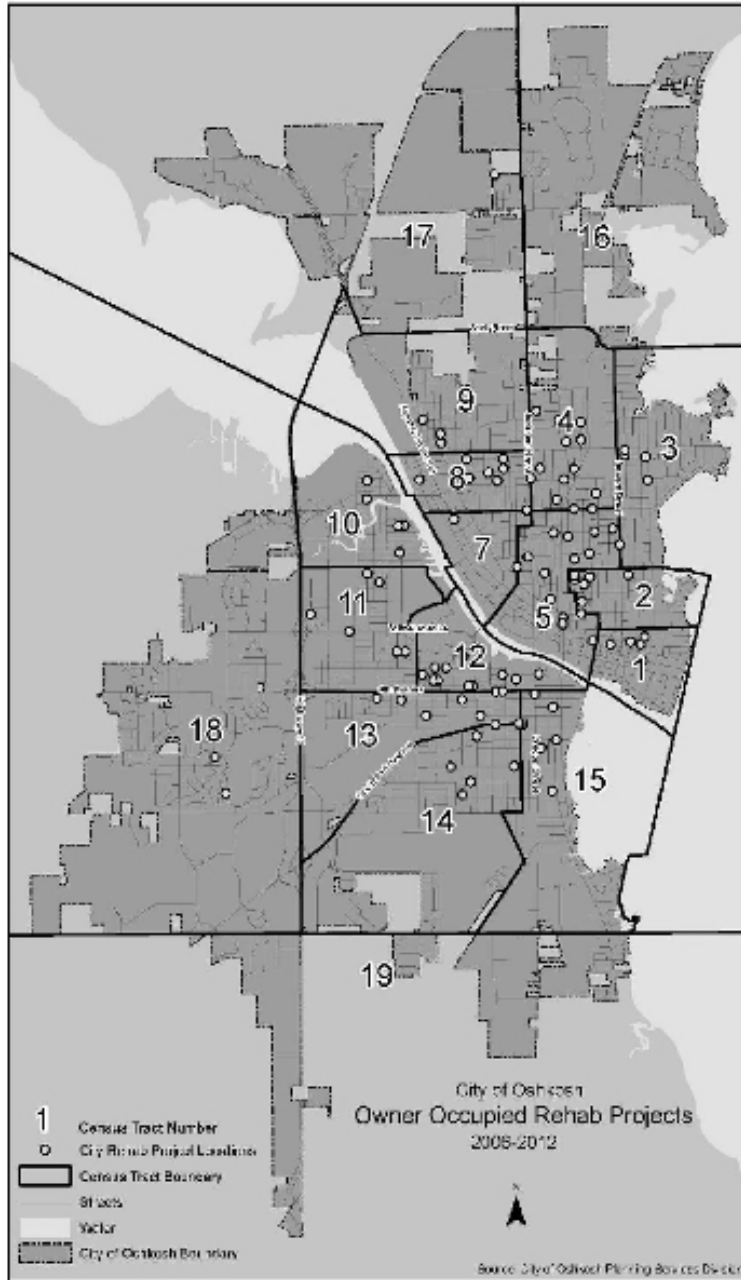
**Priority 3 Areas** are located on the periphery of the Central City. These areas have been identified as areas that will need attention in the future (20 years) as the housing stock and community facilities age. These areas have the following characteristics:

- Percentage of homes built before 1940 is higher than the overall percentage.
- In general, structures are younger than the median year that houses were constructed in the City (1959).
- Median housing values range from 8% - 30% lower than the City's overall median value.

Funds spent in these priority areas are used for single/multi-family unit rehabilitation, homeownership assistance and preservation of historic residential structures. Additionally, public infrastructure projects are funded in the priority areas including neighborhood revitalization, redevelopment, streetscaping, community policing, landlord/tenant training programs and other community facilities and programs.

Figure IV-1(following page) shows the distribution of owner-occupied housing rehabilitation projects funded by the City of Oshkosh using CDBG funds between 2006 and 2012, as reported by the City.

Figure IV-1: Owner-Occupied Rehabilitation Projects



Source: City of Oshkosh

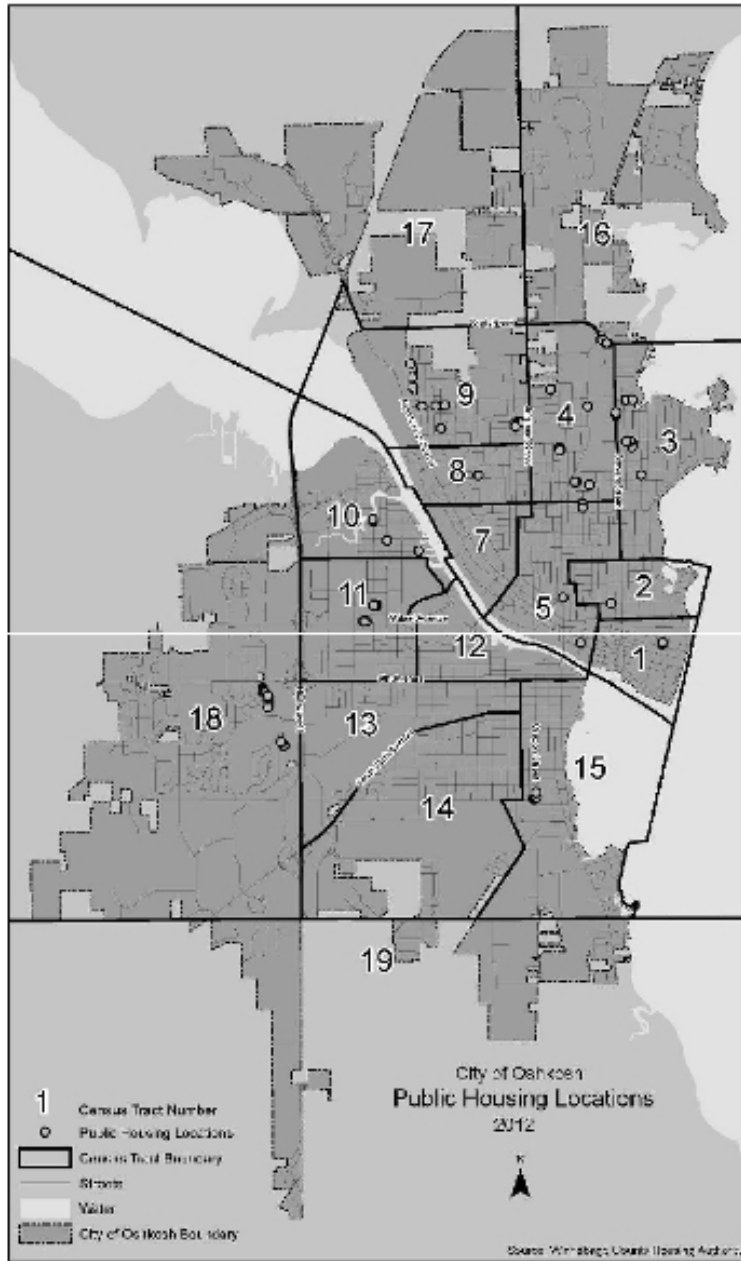
#### Oshkosh/Winnebago County Housing Authority

The Oshkosh/Winnebago County Housing Authority provides housing to LMI residents of the City/County. The Authority maintains over 650 public housing units for families, singles, elderly and disabled persons. The Authority also administers Housing Choice Vouchers (available from HUD), manages 6 group homes, coordinates a family self sufficiency program and facilitates a home ownership program. The mission of the Authority is to “promote and ensure safe, decent, and affordable housing for our participants, as well as provide owners and developers with an opportunity to rehabilitate and develop affordable housing.”

Figure IV-2(following page) shows the public housing locations managed by the Oshkosh/Winnebago County Housing Authority. Figure IV-3(page 44) shows the distribution of housing vouchers administered by the Authority. As illustrated, these maps are reasonably well distributed across the City. A comparison of these maps with the mapping of minority concentration (Figure III-3, page 11) and census tract income (Figure III-7, page 15) reveals no clear relationship between unit location and the median income or racial makeup of the surrounding area. This is a positive finding, as HUD requirements for the siting of public housing units specifically seek to avoid siting decisions that segregate minority populations (see 24 CFR §§ 1.4(b)(1)(iii) and 1.4(b)(3)). Instead, as illustrated in Figure III-15 (page 23), there is a spatial correlation between unit location and transit routes, such that most units are within walking distance of a bus route.

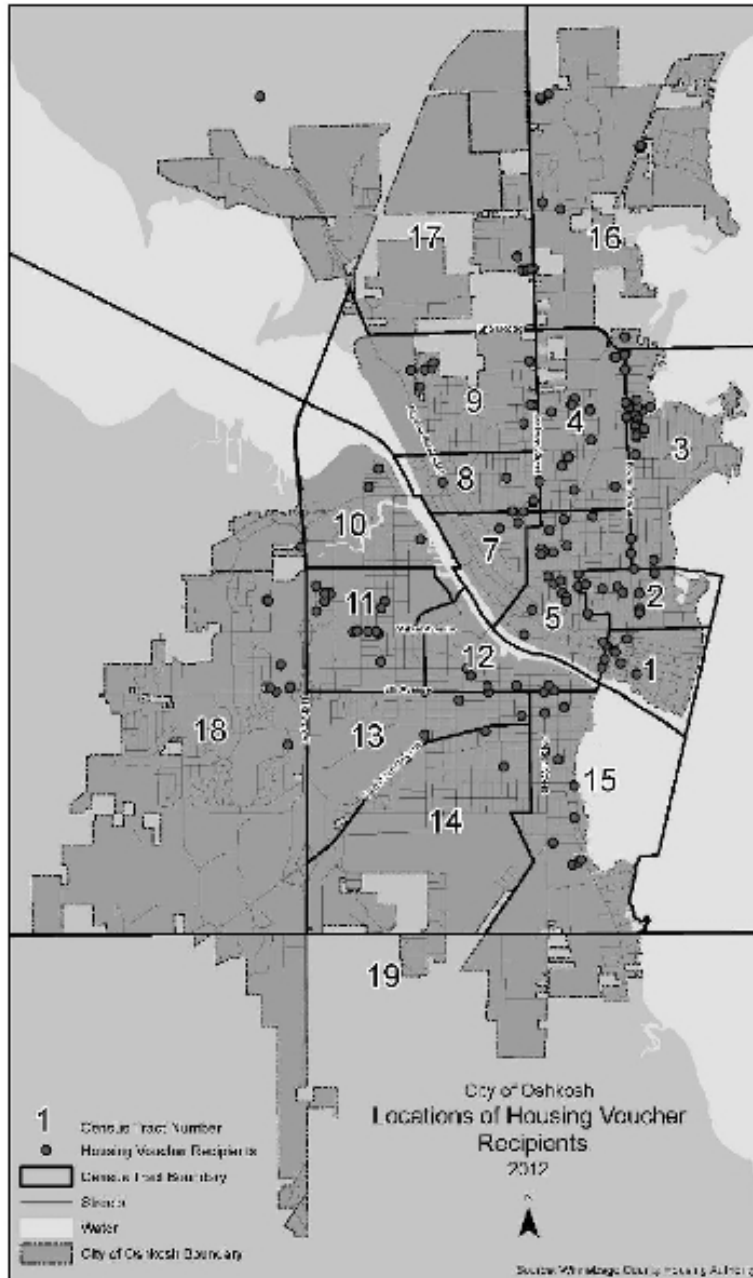


Figure IV-2: Public Housing Units



Source: Oshkosh/Winnebago County Housing Authority

Figure IV-3: Housing Voucher Recipients



Source: Oshkosh/Winnebago Housing Authority

#### Determination of Unlawful Segregation

Large-scale examples of segregated housing do not appear to 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.

#### Minimum Housing Code and Residential Rental Inspection

The City of Oshkosh has a Minimum Housing Code to prevent the deterioration of residential housing stock and to assure a minimum level of housing standards. Rental and housing inspections and enforcement of the Minimum Housing Code is the responsibility of the Inspection Services Division of the Department of Community Development. The Division will conduct inspections of rental units for tenants at no charge when problems arise. Tenants are advised to work with their landlords to resolve problems prior to inspection.

#### Zoning Code

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. Dwelling units must be a minimum of 800 square feet (excluding cellar and attached garage). Undersized lots of record can be developed, generally averaging the setbacks of adjacent properties.

In general, there is nothing in the City's zoning code which is a glaring impediment to fair housing by unduly restricting or increasing the cost of housing development. There are, however, several elements of the zoning code of which the City ought to be mindful when updating the Zoning Code:

- In all zoning districts, no more than four unrelated persons may live in any single residential unit. This should not become more restrictive.
- In the R-1C Single Family Central Residence District, the percent of two family dwelling area permitted in a R-1C Single Family Central Residence District is a maximum of 20 percent of the total land area of any R-1C Single Family Central Residence District completely bounded on all sides by other zoning districts, exclusive of public right-of-ways, as determined by the Department of Community Development. This should not become more restrictive.
- Group homes are currently permitted by right in all residential districts. This should not become more restrictive.
- The minimum lot or unit sizes should not be increased.
- The minimum living area required per person is 150 square feet for the first person and 100 square feet for each additional person. This should not become more restrictive.
- 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 and should not be further restricted.

## IV.2. Fair Housing Complaints and Discrimination Suits

### City of Oshkosh Fair Housing Complaint Process

As established by City of Oshkosh Ordinances Section 16, the City has a Commission on Equal Opportunity in Housing (Commission). As described, the Commission is responsible for fair housing enforcement, including receiving and investigating complaints, promoting settlement agreements, holding hearings as necessary, recommending enforcement measures, and recommending legislation. In practice, the City has not maintained or utilized this Commission in recent years. Instead, the City has been contracting with The Fair Housing Center of Northeast Wisconsin (FHCNW), which is a satellite office of the Metropolitan Milwaukee Fair Housing Council (Council). FHCNW receives and investigates complaints and promotes settlement agreements as necessary to resolve complaints.

Most housing-related complaints begin as phone calls, either to City Hall or directly to FHCNW. Calls to the City are directed to City planning staff. The housing planner answers any questions and determines whether the complaint is a fair housing issue or a legal issue not related to fair housing, and then refers the caller either to Legal Action or to FHCNW. Staff follows up on referrals to FHCNW with a phone call to their staff to notify them of the referral, and FHCNW then attempts to contact the complainant if the person did not contact them.

When FHCNW receives a complaint, whether as referral from the City or as a direct contact, the intake process is handled by staff in the Milwaukee office of the Fair Housing Council. The Council begins by interviewing the complainant to confirm that there is a possible violation of fair housing laws and what the violation was, including which protected class was involved. Based on this evaluation they may proceed to a full investigation to make their own determination as to the validity of the complaint, and will then counsel the complainant on their options, including attempts to seek a settlement or file a complaint.

If the complainant chooses to file a complaint, it must be submitted in writing and can be submitted by any person having personal knowledge of the facts constituting the alleged discriminatory practice. Complaints must be filed no later than one year from the alleged discriminatory action. Complaints can be filed either with the State of Wisconsin Equal Rights Division, or with the U.S. Department of Housing and Urban Development. The Fair Housing Council helps complainants file their complaint with either entity.

### Documented Fair Housing Complaints and Discrimination Suits

Section 106.50 of the Wisconsin Statutes prohibits discrimination based on sex, race, color, sexual orientation, disability, religion, national origin, marital status, family status, lawful source of income, age or ancestry and authorizes the Department of Workforce Development-Equal Rights Division to promulgate such rules as are necessary to carry out this section (Wisconsin Administrative Code-Chapter 220-Fair Housing). The law may be enforced either by filing a complaint with the Equal Rights Division within one year of the complaint and going through the administrative hearing process or a civil action may be filed directly in court.

There are three layers of fair housing protections in place within the City of Oshkosh: the City, the State of Wisconsin, and the Federal Fair Housing Act. While the protected classes for each

layer of law differ slightly, a victim of fair housing discrimination can file a discrimination suit with any (or all) applicable layers of government, however

Since the previous City of Oshkosh Analysis of Impediments to Fair Housing adopted in October 2005, 27 fair housing complaints have been documented by the Metropolitan Milwaukee Fair Housing Council (Council). Most of the complaints filed were based on disability. Table IV- categorizes the 27 complaints by the basis of the complainants.

Table IV-2: Fair Housing Complaints Received by the City of Oshkosh (2006-2011)

Basis	Number of Cases	Percentage of Cases
Disability	13	37.14%
Race	7	20.00%
Familial Status	6	17.14%
Gender	5	14.29%
Age	2	5.71%
Lawful Source of Income	2	5.71%

Source: City of Oshkosh CAPER

Since the 2005 AI, there have been a total of eighteen cases filed through the State of Wisconsin. The State of Wisconsin Equal Rights Division (ERD) maintains records of complaints at the County level. ERD reports that between January 1, 2005 and December 31 2011, there were a total of 18 investigations in Winnebago County. See Table IV- for a breakdown of these fair housing complaints.

Table IV-3: Winnebago County Fair Housing Complaints-Wisconsin Equal Rights Division, 2005-2011

Initial Determination-No Probable Cause	8
Initial Determination-Probable Cause	10
Dismissed	3
Private Settlement	1
Failure to Cooperate/Respondent	2
Withdrawn	2
Not Taken	2

Source: Wisconsin Equal Rights Division

For the period 2007-2012, there were a total of six claims filed with the federal Department of Housing and Urban Development (HUD) for Winnebago County. Of the six listed cases, four complaints were based on disability and two were based on race. Three of the six complaints were found to have “no cause” and the other three cases were settled. These claims are recorded

on the county-level, so they may have occurred within the City or they may have occurred

outside municipal boundaries within the County of Winnebago.

See Appendix A for more detailed information about the complaints described above.

### IV.3. Stakeholder Engagement

#### Interview and Focus Group Feedback

As part of the effort to identify and clarify impediments to fair housing in Oshkosh, two focus group discussions were conducted. The following groups were represented in these meetings: Energy Services, Inc., ADVOCAP, NeighborWorks, East Central Wisconsin Regional Planning Commission, Habitat for Humanity of Oshkosh, Red Cross, Fair Housing Center of Northeast Wisconsin, Fair Housing Council (Metro Milwaukee), State Senate, Winnebago County Housing Authority and the City of Oshkosh.

The discussion at these meetings is summarized below and organized by topic, including possible impediments to fair housing. Most of these issues are impediments to safe housing in some way, but only a portion are impediments to fair housing choice due to a disproportionate impact on members of a protected class. *Those considered to be true impediments to fair housing choice in the City of Oshkosh are italicized.*

While a reflection only of the opinions of the participants, they are the informed opinions of people who work in and understand housing issues in the City and region. These comments and observations therefore serve as the foundation for many of the recommended action items to improve fair housing choice.

#### Administrative Issues

- People don't know what constitutes a valid fair housing complaint, and there is confusion between fair housing law and landlord tenant laws.
- Reporting and pursuance of fair housing complaints is low.
- People who experience problems with tenant legal rights or fair housing issues tend not to complain or follow through with the process because they fear landlord retaliation or eviction.
- *There is a need for landlord education, especially for new landlords who are converting foreclosed homes into rental properties and do not know the rules and regulations of fair housing.*
- There is no rental inspection program or requirement.
- Prior City initiatives to improve code compliance seem to have disproportionately affected (required repair spending by) certain disadvantaged populations.
- New neighborhood associations are being formed. Minorities are generally unrepresented in these associations, and their interests may not be represented.
- Hmong residents seldom file housing-related complaints. Cultural resistance (shame of discrimination), a strong community network and language barriers may explain this.
- City housing staff members get requests for translation assistance, but are not sure who to call for assistance.
- Landlords may be hesitant to seek translator assistance because they are afraid they will have to pay for it.

#### Regulatory Issues

- There is a law in the City that requires a minimum of at least 40 square feet per person per bedroom, landlords sometimes use this to steer families to larger, more expensive units. [The

relevant ordinance is 16-36 (A)(1), which in fact requires 150 square feet for the first occupant and 100 square feet for each additional occupant]

- Code prohibits temporary wheelchair ramps. [Ordinance 30-35 (B)(5) permits ramps but does not address design standards or provisions for temporary structures. Staff indicated that temporary ramps – without footings – are permitted for up to 180 days.]
- Code violations are addressed only in a reactionary way – the City has one inspector who responds to complaints. Should probably have 3.
- Group homes are permitted in multiple zoning districts, but are routinely opposed by surrounding residents, especially in more affluent neighborhoods. Concerns include the presence of alcohol and drug addicts, loitering, and traffic. The City is working to address complaints about loitering around the home.

### Housing Supply Issues

- There was concern expressed about a need for more independent living facilities in the City.

### Housing Quality Issues

- The general opinion is that housing stock in the City is not in good shape, especially or mostly in the central neighborhoods. There are too many properties not compliant with current building codes.
- *Mold is a common issue. People who develop respiratory problems due to mold then find it difficult to find new housing because their efforts are hampered by their physical condition.*

### Quality Issues Specific to Students

- There is a lack of quality of rental stock for students.
- Students don't know what's legal and what's not about housing standards (e.g. escape route requirements).
- City ordinance limits the number of unrelated people living together to four, but students are willing to live with more to a unit and/or in non-legal spaces. Quite often, not all of the tenants have been identified on lease documents.

### Affordability/Financial Issues

- It is hard for low-to-moderate income residents to compete for safe, clean housing.
- Habitat for Humanity has a difficult time finding families that are willing to commit the required sweat equity. They are also finding it hard for families to meet today's strict lending requirements, especially due to the prevalence of personal bankruptcies.
- Hmong residents have been victimized by predatory lenders and brokers who are prequalifying mortgages without proper resources, and setting them up as a high foreclosure risk.
- Handicap-accessible units tend to be newer and more expensive.
- *Low-income residents with a handicap have few options.*
- *Although most landlords will make reasonable accommodations for people with disabilities, door widths are tough to fix and ramps are too expensive to build.*

### Spatial Issues

- *Concerns about the Logan Drive area (north end of Jackson Street) were raised. This area, part of census tract 17, includes Section 8 and Section 42 units and has a large supply of handicap-accessible units. There are mobility problems for anyone without a personal vehicle – the area does not have sidewalks and the bus only stops every 90 minutes.*
- The 9<sup>th</sup> Avenue area has a high number of rental houses owned by small landlords (who tend to be less well informed about tenant rights and fair housing laws).

- Neighborhood stability has been a concern in areas of the City that are at least 50% rental. The Broad-Bay areawas identified.

#### **Discriminatory Issues**

- *Some owner-occupant landlords may be discriminating against (not renting to) renters with young children. The landlords and renters may not know that this is illegal.[Current City ordinance permits such discrimination in buildings with four or fewer units, but this is not consistent with State law.]*
- *Families with children are treated differently. Shorter leases and lease conditions that are not imposed on others is the most common form of discrimination.*
- *Larger families (e.g. 4 children) are steered from 2-bedroom units to larger units that are too expensive (though not necessarily because the family size would exceed the limits of the City ordinance).*
- *Families are often denied housing in favor of student renters since they are easier to rent to (less complaints from the renters).*
- *Some landlords will request the first and last month's rent as a strategy to turn people away. This is not a legal practice, though there is no specific knowledge of its use against members of a specific protected class.*
- *There have been instances of rental application denials due to the use of unemployment benefits as a stated income. This has become a larger issue over the last few years due to economic conditions.*
- *At least one landlord in the area is known to require a "representative payee" of renters known to be receiving rent money through social security or other public source*
- *Some landlords may be discriminating against potential tenants based on how people sound on the phone.*
- *Observation that banks have been more likely to maintain foreclosed homes in white neighborhoods than in minority and/or low income neighborhoods.*
- *People with certain mental health challenges may "act out" occasionally due to delusions or other forms of psychosis. These can result in complaints from neighbors and possible eviction.*
- *There is one known instance of a wheelchair-bound resident being asked to move for leaving scuff marks in hallways.*
- *Landlords often need to be informed that charges related to battery or domestic abuse are common, because state law requires that someone has to get charged if the police are called.*

#### **Possible Actions suggested during the Focus Groups**

- The housing coalition is working on updating the manual for landlord education.
- Student legal services could also help implement a landlord education Class.
- The City could benefit from builder workshops on universal design.



## V. Identification of Impediments to Fair Housing Choice and Recommended Municipal Activities to Alleviate Impediments

The data collection and analysis, and the focus groups, revealed both real and perceived impediments to fair housing that could be addressed. This section details the most pervasive and realized impediments to fair housing and outlines recommended municipal activities that will help alleviate these impediments to fair housing.

### V.1. Administrative Impediments (Public and Private)

#### Poor Understanding of Fair Housing Rights and Complaint Procedures

The low numbers of complaints and the focus group discussions strongly reinforce the need for more robust education efforts. There are too many landlords that don't know fair housing law, very few residents that know it, and fear or ignorance of the complaint process among residents. This is having the greatest impact on residents with low incomes or poor credit who are sometimes choosing to live in substandard units because they feel they have no viable alternative. It is imperative that the City actively *affirmatively further fair housing* and this means making sure that City residents are informed of their fair housing rights and how to file a claim.

#### Suggested Actions:

- Offer varied outreach activities throughout the year to reach both landlords and residents. Collaborate with the Housing Coalition and Student Legal Services to co-sponsor and promote outreach events.
- Revise the City website to make information about fair housing rights easier to find. Many people do not know that housing discrimination issues are referred to as "fair housing", nor is it intuitive to look for this information under "Planning Services". It is recommended that all housing-related topics currently listed under "Inspection Services" and "Planning Services" be consolidated in some way at a higher level in the directory structure, and "Fair Housing" be revised to "Fair Housing Rights" or similar.
- Include more examples of illegal discrimination in outreach activities and materials, especially highlighting situations known to have occurred in Oshkosh. Based on complaints received and the experience of housing-related professionals, examples should be sure to highlight the rights of disabled residents and families with children, and the rights and responsibilities of duplex (or multi-unit) owner-occupants with regard to who they are (and are not) allowed to turn away.

#### Inadequate Support for Non-English Speaking Residents

Staff reported uncertainty regarding who to call for translation assistance. Focus group participants reported landlord uncertainty as well, and resistance to reaching out due to the assumption that they would need to pay for such assistance. Language barriers are a clear impediment to housing choice. Residents who do not speak English are typically immigrants from other countries and are typically non-white, and are therefore protected classes.

#### Suggested Actions:

- Identify reliable translation assistance services that can be utilized by City staff and by landlords, realtors, lenders, etc (especially Spanish and Hmong) and establish funding for that assistance as necessary.

- Enhance landlord and renter education materials and training to incorporate information about translation services, including cost, and continue to offer fair housing materials in Hmong and Spanish.

## V.2. Regulatory Impediments (Public)

### Misleading Fair Housing Ordinance

The City's current Fair Housing ordinance includes an exemption for owner-occupied buildings with four or fewer units. This exemption matches Federal law but is inconsistent with State law, which has no such exemption. Both laws apply in Oshkosh and the exemption should be removed. Also, the City ordinance does not include all of the protected classes identified by state law. While the City has been accurately representing all of the state's protected classes in its fair housing literature, its own ordinance should be updated to match state law, to eliminate any confusion and as a matter of good policy. Finally, the City's ordinance describes the establishment and function Oshkosh Commission on Equal Opportunity in Housing, but in practice there is no functioning commission. There is no requirement to have such a commission.

#### Suggested Actions:

- Amend Section 16-4 of the City Municipal Code to incorporate all of the protected classes identified by State Statute 106.5. The amendment should add marital status; sexual orientation; lawful source of income; age; and status as a victim of domestic abuse, sexual abuse, or stalking; and should add definitions for these terms.
- Amend Section 16-5 of the City Municipal Code to remove the exemption for owner-occupied dwellings.
- Amend Sections 16-3, 16-7 and 16-8 to eliminate the Commission on Equal Opportunity in Housing.

## V.3. Quality Impediments (Private)

### Poor Condition of Housing Stock

There is broad concern about living conditions for those with limited financial means. Many apartments are substandard in some way and protected classes are more likely than others to rent such units and experience poorer living conditions.

#### Suggested Actions:

- Create a rental registry program that ensures proactive inspections of units for safety and code compliance. Incorporate fair housing information into the registration materials and process.
- Enhance landlord and renter education materials and training to incorporate information about mold, including health risks, prevention, and clean-up resources.

## V.4. Supply Impediments (Private)

### Inadequate Supply of Appropriate Housing for Residents with Disabilities

The greatest number of recorded complaints over the past 5+ years are related to disability. Focus group participants reinforced this finding, reporting limited options for disabled residents, and especially low-income disabled residents because most of the accessible units are newer and

more expensive than the older, inaccessible units. This is an impediment that disproportionately affects older residents due to the prevalence of disability among residents over age 65.

Suggested Actions:

- Continue to offer home improvement loans to income-qualified residents to assist with the cost of accessibility retrofits, and require or encourage that funded projects result in “visitability”, which includes a no-step entry, one wheelchair accessible bathroom, and 32” doorways and on the main level.
- Encourage the development of more units in the City that incorporate universal design principles. Create a pamphlet that describes universal design, the need for more units that accommodate residents with disabilities, and identifies design support resources.
- Work with local developers and builders to offer training in universal design techniques and encourage their application in all new development, not just designated “accessible units”.

### V.5. Transportation Impediments (Public)

#### Lack of Adequate Transportation Options in Some Parts of the City

Alternative transportation resources for residents who cannot drive are generally adequate, with some important exceptions. There are some key streets and neighborhoods that have neither sidewalks nor good bus service. A noteworthy example is the multifamily apartments on Logan Drive, off of North Jackson Street. These units include handicap-accessible units at reasonable prices, but the lack of sidewalks or frequent bus service limits the options for some residents to adequately meet their daily needs.

Suggested Actions:

- Work with GO Transit to review transit accessibility across the City, and especially in Census Tracts 16 and 17. Evaluate the feasibility of reducing headway on service to northern parts of the city to 30 minutes.
- Ensure the provision of complete streets, including safe bike and pedestrian pathways, whenever streets are built or reconstructed. Work with the adjoining town governments and Winnebago County to ensure adequate bike and pedestrian linkages where pockets of Town land remain within the City’s growth area, especially to establish connectivity from the north side (tracts 16 and 17) to other parts of the City.

### V.6. Financial Impediments (Private)

#### Lack of Loans to Minorities

The HDMA data show that minorities, especially African Americans, are less likely to originate a conventional loan. If they secure a loan, it is more likely to be a non-conventional loan. The inability to secure a mortgage, refinance, or home improvement loan is clearly a barrier to housing choice. If this barrier is higher for members of a protected class, it is an impediment that the City should work to eliminate.

Suggested Actions:

- Provide more credit and home-buying education to citizens, especially minority residents.
- Provide education and information for local lenders on predatory lending practices, to ensure that efforts to reduce the racial disparities in loan origination do not have the unintended consequence of increased rates of default and foreclosure among minority borrowers

**VI. Appendices**

*Appendix A: Fair Housing Complaints*

**As compiled by the City of Oshkosh in the annual CAPER, 2006-2011:**

2006 CAPER (excerpt)

interacting with tenants in a fair and legal manner. Five fair housing complaint intakes were opened and closed during the program year – two on the basis of race and three on the basis of ability/disability.

2007 CAPER (excerpt)

Activities undertaken by contracted services - The Fair Housing Center of Northeast Wisconsin (FHCNW) received \$10,000 in 2007 CDBG funds. The FHCNW is the local affiliate of the Metropolitan Milwaukee Fair Housing Council. FHCNW processed 2 fair housing complaints, six interagency meetings, 48 community outreach contacts, conducted six fair housing presentations reaching 92 Winnebago County/Oshkosh Housing Authority potential clients and conducted one seminar (rental management training and Housing Authority and other nonprofit staff training) during the Program Year. Topics covered included: local, state and federal fair housing law, contemporary forms of discrimination in the housing market, remedies available for discrimination and how complaints are processed/investigated. Of the two fair housing complaint intakes that were opened and closed during the program year – one was on the basis of gender and one was on the basis of ability/disability.

2008 CAPER (excerpt)

Activities undertaken by contracted services - The Fair Housing Center of Northeast Wisconsin (FHCNW) received \$9,625 in 2008 CDBG funds. The FHCNW is the local affiliate of the Metropolitan Milwaukee Fair Housing Council. FHCNW fortunately did not need to process any fair housing complaints but 30 persons received fair housing referral services for non-fair housing issues (evictions, lease issues, code violations,

2009 CAPER (excerpt)

Activities undertaken by contracted services - The Fair Housing Center of Northeast Wisconsin (FHCNW) received \$10,000 in 2009 CDBG funds. The FHCNW is the local affiliate of the Metropolitan Milwaukee Fair Housing Council. FHCNW conducted six fair housing complaints as follows:

PY 2009 FAIR HOUSING COMPLAINTS					
Date	Race	Sex	Number in Family	Income Level	Basis of Complaint
8/25/09	White	Female	2	Low	Disability
9/16/09	White	Female	1	Low	Disability/Age
1/15/10	White	Female	4	Ex-Low/None	Sex, Familial Status
3/4/10	White	Female	6	N/A	Familial Status
4/14/10	African American	Female	1	Low	Race
4/16/10	White	Female	2	N/A	Sex

2010 CAPER (excerpt)

Activities undertaken by contracted services – In 2010, the Fair Housing Center of Northeast Wisconsin (FHCNW) received \$10,000 in CDBG funds. FHCNW is the local affiliate of the Metropolitan Milwaukee Fair Housing Council. FHCNW investigated six (6) fair housing complaints as follows:

PY 2010 FAIR HOUSING COMPLAINTS					
Date	Race	Sex	Number in Family	Income Level	Basis of Complaint
5/12/10	African – American	Male	3	Extremely Low Income	Race
9/28/10	Hispanic	Female	2	N/A	Lawful Source of Income
10/5/10	African – American	Female	2	Low Income	Race, Disability
11/30/10	White	Female	3	None	Disability, Familial Status, Sex
2/28/11	White	Female	3	N/A	Sex, Marital Status
3/17/11	White	Female	4	N/A	Familial Status

#### 2011 CAPER (excerpt)

Activities undertaken by contracted services – In 2011, the Fair Housing Center of Northeast Wisconsin (FHCNW) received \$10,000 in CDBG funds. FHCNW is the local affiliate of the Metropolitan Milwaukee Fair Housing Council. FHCNW investigated eight (8) fair housing complaints as follows:

PY 2011 FAIR HOUSING COMPLAINTS					
Date	Race	Sex	Number in Family	Income Level	Basis of Complaint
6/9/11	White	Female	3	NA	Race
10/12/11	White	Female	2	NA	Disability
11/1/11	White	Female	2	Low	Disability, Familial Status
11/2/11	African American	Male	2	Low	Race, Age
11/14/11	White	Female	1	Low	Disability
12/6/11	White	Female	1	Low	Disability
2/27/12	White	Female	2	Extremely Low	Lawful source of income
4/2/12	White	Male	1	Extremely Low	Disability

**As compiled and reported by the State of Wisconsin Civil Rights Bureau:**

*As Program Supervisor for Civil Rights I have access to some Civil Rights case data which maybe what you need. Our records retention are for 6 years after case closure. The numbers below are for Winnebago County and cover the years of January 1, 2005 through December 31, 2011.*

*Winnebago County had a total of 18 investigations with the following outcomes: Initial Determination - No Probable Cause - 8 Initial Determination - Probable Cause - 3 Dismissed - Failure to Cooperate/Respondent - 2 Dismissed - Withdrawn - 2 Dismissed - Not taken - 2 Dismissed - Private Settlement 1*

*I hope this information is helpful.  
Sincerely,*

*Marlene A. Duffield  
Program Supervisor, Civil Rights Bureau  
Investigation Sections  
Equal Rights Division  
Department of Workforce Development  
201 E. Washington Ave. P.O. Box 7972  
Madison, WI 53707-7972  
[marlene.duffield@dwd.wisconsin.gov](mailto:marlene.duffield@dwd.wisconsin.gov)  
T 608/264-8746  
F 608/267-4592*

**As compiled and reported by HUD, Office of Fair Housing and Equal Opportunity:**

**Cases Received from Oshkosh, WI**

CY Filed	Case Number	Filing Date	Bases	Issues	Zip Code	Case Completion Type, Detailed	Number of Filed Cases
CY2007	05-07-1394-8	8/9/2007	Disability,	380 - Discriminatory terms, conditions, privileges, or services and facilities, 500 - Failure to permit reasonable modification, 510 - Failure to make reasonable accommodation,	54901	25 No Cause	1
CY2008	05-08-1163-8	6/6/2008	Race,	380 - Discriminatory terms, conditions, privileges, or services and facilities,	54901	25 No Cause	1
CY2009	05-09-1314-8	6/18/2009	Race,	350 - Discriminatory financing (includes real estate transactions),		25 No Cause	1
	05-10-0265-8	11/23/2009	Disability,	430 - Otherwise deny or make housing unavailable,	54902	16 Conciliated/Settled	1
CY2011	05-12-0294-8	12/15/2011	Disability,	510 - Failure to make reasonable accommodation,	54901	16 Conciliated/Settled	1
CY2012	05-12-0824-8	5/9/2012	Disability,	510 - Failure to make reasonable accommodation,	54901	16 Conciliated/Settled	1
<b>Total</b>							<b>6</b>

*Appendix B: Fair Housing Ordinance (Oshkosh Ordinance Chapter 16, Division 2)***DIVISION 2. FAIR HOUSING****SECTION 16-3 DEFINITIONS**

- (A) "Commission" shall mean the Oshkosh Commission on Equal Opportunities in Housing and "Commissioner" shall mean a member thereof.
- (B) "Complainant" shall mean any person who files a complaint with the Commission pursuant to this Division.
- (C) "Dwelling" shall mean any building, structure, or portion thereof which is occupied as, or designated or intended for occupancy as, a residence by one or more families, and any vacant land which is offered for sale or lease by the construction or location thereon of any such building, structure, or portion thereof.
- (D) "Familial status" shall mean one or more individuals who have not reached the age of 18 living with a parent or another person having legal custody of such individual or individuals, or the designee of such parent or other person having such custody with the written permission of such parent or other person. This shall also apply to any person who is pregnant or is in the process of securing legal custody of any individual who is not 18 years of age.
- (E) "Handicap" means, with respect to a person, a physical or mental impairment which substantially limits one or more of such person's major life activities, a record of such impairment, or being regarded as having such impairment.
- (F) "Housing" shall include any room, apartment, house, building or trailer or structure any part of which is used or offered for use for human habitation on a temporary or permanent basis, or land, whether or not vacant.
- (G) "Owner" shall include a person who has any part of the fee interest, including a person who has a life estate.
- (H) "Owner occupied dwelling" shall mean housing in which the owner thereof maintains his permanent living quarters.
- (I) "Persons" shall include any individual, partnership, labor or other association, corporation, legal representative, receiver, trustee, trustee in bankruptcy or other fiduciary, or the lessee, proprietor, manager, employee or any other agent of such person.
- (J) "Respondent" shall mean any person named in any complaint filed, against whom an allegation of prohibited discriminatory practice under this Division.

**SECTION 16-4 ACTS PROHIBITED BY THIS DIVISION****(A) It Shall Be a Prohibited Discriminatory Practice for Any Person to:**

- (1) Discriminate in real property transactions.  
Refuse to sell, lease, sublease, rent or in any other manner deny, withhold, or impair the transfer of title, leasehold or any other interest in any part of any housing, when such refusal is based upon race, color, sex, religion, ancestry, national origin, familial status, or handicap of the person refused.
- (2) Discriminate in lending money for purchase or improvement of Property.  
Refuse to lend money, guaranty any loan, accept any mortgage or in any other manner make available any funds or resources for the construction, acquisition, purchase, rehabilitation, repair or maintenance of any housing when such refusal is based upon race, color, sex, religion, ancestry, national origin, familial status, or handicap of the person refused; or
- (3) Discriminatorily refuse to furnish services.  
Refuse to furnish for any housing such facilities or services ordinarily provided pursuant to legal duty, when such refusal is based upon race, color, sex, religion, ancestry, national origin, familial status, or handicap of the person refused.
- (4) To coerce, intimidate, threaten, or interfere with any person in the exercise or enjoyment of, or on account of having exercised or enjoyed, or on account of having aided or encouraged any other person in the exercise or enjoyment of any right protected by this Division.
- (5) For an owner of residential rental property to refuse to permit a handicapped tenant to make reasonable modification, at the tenant's own expense, of the premises if the proposed modifications are necessary for the full use of the premises by the tenant.

**(B) Public Communication Indicating Intent to Violate Paragraph (A) Above Prohibited**

It shall be prohibited discriminatory practice of any person to print, publish, circulate, issue, display, post, mail or communicate in any other way any announcement, statement, advertisement, publication or sign, the import of which indicates a decision or purpose to do any act prohibited under Section (A).

**(C) Rights of Owner**

- (1) Nothing in this Division shall be deemed to prohibit an owner or the agent from requiring that any person who seeks to buy, rent or lease any housing supply information concerning family, marital, financial and business status.
- (2) Nothing in this Division shall be deemed to prohibit an owner or the agent from refusing to sell, rent or lease any housing to any person on the basis of treatment of any property formerly occupied by the person or on the basis of the person's record in paying rent or other obligations when due.
- (3) When it is reasonable to do so, permission granted by an owner to permit a handicapped tenant, at the tenant's expense, to make reasonable modifications to a premises may be conditioned upon the renter or lessee agreeing to restore the premises to the condition that existed prior to the modification, reasonable wear and tear excepted.



**SECTION 16-5 EXEMPTIONS**

- (A) No prohibition in this Division shall apply to an offer or advertisement to lease or rent, or to the lease or rental of, rooms or units in dwellings containing living quarters occupied or intended to be occupied by no more than four families living independently of each other where the owner occupies one of the living quarters.
- (B) The prohibition in this division against discrimination based on familial status does not apply to housing for older persons.
- (1) As used in this subdivision, "housing for older persons" means housing:
- (a) Provided under any State or Federal program that is specifically designed and operated to assist elderly persons (as defined in the state or federal program); or
  - (b) Intended for, and solely occupied by, persons 62 years of age or older; or
  - (c) Intended and operated for occupancy by at least one person 55 years of age or older per unit. Housing for older persons under this paragraph shall contain at least the following factors:
    - (I) Significant facilities and services specifically designed to meet the physical or social needs of older persons, or if the provision of such facilities and services is not practicable, the provider may demonstrate that such housing is necessary to provide important housing opportunities for older persons; and
    - (II) At least 80 percent of the units are occupied by at least one person 55 years of age or older per unit; and
    - (III) The publication of, and adherence to, policies and procedures which demonstrate an intent by the owner or manager to provide housing for persons 55 years of age or older.
- (2) Housing shall not fail to meet the requirements for housing for older persons by reasons of:
- (a) Persons residing in such housing as of the date of enactment of this Ordinance who do not meet the age requirements of subparagraph (b) or (c) above, provided that new occupants of such housing meet the age requirements of subparagraph (c) above.
  - (b) Unoccupied units, provided that such units are reserved for occupancy by persons who meet the age requirements of subparagraph (c) above.

**SECTION 16-6 REPEALED**

**SECTION 16-7 POWERS AND DUTIES OF COMMISSION**

The Commission on Equal Opportunity in Housing shall have the following powers and duties:

- (A) Adopt Rules  
To adopt, amend, publish and rescind rules for governing its meetings and hearings; and for implementation of this Division.
- (B) Receive and Investigate Complaints  
To receive and authorize staff investigation of all complaints alleging any discriminatory practice prohibited by this Division.
- (C) Promote Settlement Agreements  
The Commission shall seek a settlement agreeable to both the complainant and the respondent by means of informal conferences.
- (D) Hearings  
To hold hearings, if necessary, after efforts at settlement based on complaints made against any person, to administer oaths and take testimony, to compel the production of books, papers and other documents relating to any matter involved in the complaint, and to subpoena witnesses and compel their attendance.
- (E) Recommend Enforcement Measures  
To make recommendations for enforcement of this Division to the City Attorney.
- (F) Recommend Legislation to Council  
To recommend to the City Council any legislation necessary to promote further the purposes of this Division and to file annual written reports of its work with the City Council.

**SECTION 16-8 ENFORCEMENT PROCEDURES**

- (A) Complaint  
Any complaint alleging any discriminatory practices prohibited by this Division shall be reduced to writing and verified by the complainant. Such complaints may be initiated by any person having personal knowledge of the facts constituting the alleged discriminatory practice. All complaints shall contain the following:
  - (1) The name and address of the complainant, and of the person allegedly discriminated against, if different.
  - (2) The name and address of the respondent or respondents.
  - (3) A statement setting forth the facts constituting the alleged discriminatory practice, and
  - (4) The date or dates of the alleged discriminatory practice.
- (B) Where Filed  
Complaints shall be filed with the City Clerk who shall transmit the same to the Commission Chairperson and Secretary.
- (C) When Filed  
Complaints alleging any discriminatory practice prohibited by this Division shall be filed no later than 1 year from the termination or occurrence of an alleged discriminatory practice.

- (D) Notice to Respondent  
The Commission shall provide a copy of the complaint to the respondent within ten (10) days of said filing. The respondent shall have ten (10) days after receipt of the complaint to file a response with the Commission.
- (E) Amendment and Withdrawal  
A complaint may be amended or withdrawn by the complainant at any time with and subject to the approval of the Commission or its designated agent and under such terms as the agent shall direct.
- (F) Investigation, Conciliation and Hearings
- (1) The Chairperson shall direct the Secretary, or the Secretary's designee, to promptly investigate all duly filed complaints. Within thirty (30) days of such filing, the Secretary or the Secretary's designee shall file a report of said investigation with the Commission.
  - (2) Conciliation may be undertaken by the Secretary or the Secretary's designee who shall file a report of said conciliation with the Commission. The action authorized by subsection (3) below may be delayed, on order of the Chairperson, pending a report of such conciliation which shall be filed within sixty (60) days of appointment of the conciliator.
  - (3) Upon filing the report of the investigation and/or conciliation, and within seventy (70) days of filing of the complaint, the Commission shall by majority vote of the members present and voting, make a preliminary determination whether there is probable cause to believe that discrimination did occur. If there is no finding of probable cause, the case will be closed and the claimant and respondent promptly notified.
  - (4) If the Commission determines probable cause exists to believe discrimination occurred, then the Commission shall conduct a hearing to determine facts upon which to base a recommendation for prosecution to the City Attorney. Said hearing shall be conducted within eight-five (85) days of filing the complaint. The complainant and respondent may but need not be represented at said hearing by an attorney. The Commission may subpoena witnesses and compel testimony.
  - (5) At the conclusion of the hearing, the Commission shall by majority vote of those members present and voting, make a final determination whether there is probable cause to believe that discrimination did occur. If there is no finding of probable cause, the case will be closed and the claimant and respondent promptly notified. If there is a finding of probable cause, the Commission shall promptly notify the claimant and respondent of the finding and no later than one hundred (100) days of filing the complaint, recommend to the City Attorney that prosecution be commenced.
  - (6) No Commissioner who has filed a complaint on the Commissioner's own initiative or who has
  - (7) If any person fails to attend such hearing or to testify when subpoenaed, the Commission may refer such refusal to the City Attorney who shall seek judicial enforcement of such subpoenas.

**SECTION 16-9 LIBERAL CONSTRUCTION; SEVERABILITY**

- (A) The provisions of this division shall be liberally construed in order to promote the purposes and provisions contained herein.
- (1) It is the intention of the City Council that this be interpreted consistently with Title VIII of the Civil Rights act of 1968 (42 USC Sec. 3601-3619) as amended, and with regulations applicable thereto (24 CAR Parts 4, 100, 103, 110, 115 and 121) except where the language of this subsection clearly requires a different interpretation.
- (B) The provisions of this Division are severable and if any provision, sentence, clause, section or part thereof is held illegal, invalid, unconstitutional or inapplicable to any person or circumstance, such illegality invalidity, unconstitutionality or inapplicability shall not affect or impair any of the remaining provisions, sentences, clauses, Sections or parts of the Division or their application to other person or circumstances. It is hereby declared to be the legislative intent that this Division would have been adopted if such illegal, invalid, unconstitutional or inapplicable provision, sentence, clause, Section or part thereof had not been included therein, and if the person or circumstances to which the Division or any part thereof is inapplicable had been specifically exempted therefrom.

*Appendix C: Home Mortgage Disclosure Act (2009) Data*

## INSTITUTIONS WHO HAVE A HOME OR BRANCH OFFICE IN THE MSA/MD

ALLIED HOME MORTGAGE CORP	ALLIED HOME MTG CAPITAL CORP	AMERICAN BANK
AMERICAN EQUITY MORTGAGE, INC.	AMERICAN FINANCIAL RESOURCES	AMERICAN INTERNET MORTGAGE
AMERISAVE MORTGAGE CORPORATION	ANCHORBANK FSB	ASSOCIATED BANK NA
BADGER GLOBE CREDIT UNION	BADGERLAND FINANCIAL	BANK FIRST NATIONAL
BANK MUTUAL	CAPITAL CREDIT UNION	CARNEGIE MORTGAGE
CHICAGO MORTGAGE SOLUTIONS	CHOICE BANK	CITIFINANCIAL, INC.
CITIMORTGAGE, INC	CITIZENS BANK	CITIZENS COMMUNITY FEDERAL
CitizensFirst Credit Union	CLEARPOINTE CAPITAL INC	COMMUNITY FIRST CREDIT UNION
CONSUMER LOAN SERVICES LLC	EMBRACE HOME LOANS, INC.	ENVOY MORTGAGE, LTD.
FAIRWAY INDEPENDENT MORT. CORP	FIFTH THIRD MORTGAGE COMPANY	FIRST NATIONAL BANK
FIRST NATIONAL BANK-FOX VALLEY	FIRST RESIDENTIAL MORTGAGE	FOX COMMUNITIES CREDIT UNION
FOX VALLEY SAVINGS BANK	FRANKLN AMERICAN MORTGAGE CO	FREEDOM MORTGAGE CORPORATION
GATEWAY FUNDING DMS, LP	GMAC MORTGAGE LLC	GSF MORTGAGE CORPORATION
HOME LOAN CENTER	HORICON BANK	IFREEDOM DIRECT CORPORATION
INLANTA MORTGAGE INC	JPMORGAN CHASE BANK, NA	KIMCENTRAL CREDIT UNION
LAKEVIEW CREDIT UNION	LOANDEPOT.COM	LSI MORTGAGE PLUS
MMI MARSHALL & ILSLEY BANK	MORTGAGE INVESTORS CORP	MORTGAGE SERVICES III, L.L.C.
NATIONSTAR MORTGAGE LLC	NETWORK FUNDING LP	NEW DAY FINANCIAL, LLC
NORTH SHORE BANK FSB	NYCB MORTGAGE COMPANY LLC	ONEMAIN FINANCIAL SERVICES, INC
PEOPLES HOME EQUITY, INC	PHH MORTGAGE CORPORATION	POLARIS HOME FUNDING CORP.
PRIMARY RESIDENTIAL MORTGAGE	PROSPERA CREDIT UNION	PROVIDENT FUNDING ASSOCIATES
QR LENDING INC	QUICKEN LOANS	REAL ESTATE MORTGAGE NETWORK
RESIDENTIAL FINANCE CORP.	SIERRA PACIFIC MORTGAGE COMP	SIRVA MORTGAGE, INC
SUNTRUST MORTGAGE, INC	TOWNE MORTGAGE COMPANY	US BANK, N.A.
UW CREDIT UNION	WATERSTONE MORTGAGE CORP	WELLS FARGO BANK, NA
WELLS FARGO FUNDING, INC	WEST POINTE BANK	WINNEBAGO COMMUNITY CREDIT UNI

Report Date: 06/04/2012

MSA/MD: 26790 - OSHKOSH-NEENAH, WI

## INSTITUTIONS WHO DO NOT HAVE A HOME OR BRANCH OFFICE IN THE MSA/MD

1ST ADVANTAGE MORTGAGE	21ST MORTGAGE	STAR BANK
ACCESS NATIONAL BANK	ACCUNET MORTGAGE LLC	AFFILIATED BANK
AFFILIATED MORTGAGE COMPANY	AGSTAR FINANCIAL SERVICES	ALLY BANK
ALTRA FEDERAL CREDIT UNION	AMERICAN BANK	AMERICAN MIDWEST BANK
AMERICAN NB FOX CITIES	AMERIPRISE BANK, FSB	ANDERSON FINANCIAL GROUP
ASSURED MORTGAGE INC.	AURORA BANK FSB	BANK OF AMERICA, N.A.
BANK OF ENGLAND	BANK OF MANHATTAN NA	BANK OF OAKFIELD
BARRINGTON BANK & TRUST CO/NA	BAY BANK	BAYLAKE BANK
BEST ADVANTAGE CREDIT UNION	BLC COMMUNITY BANK	BMO HARRIS BANK N.A.
BNC NATIONAL BANK	BRANCH BANKING AND TRUST CO	BRIDGEVIEW BANK MORTGAGE COMPA
CARRINGTON MORTGAGE SERVICES	CHARLES SCHWAB BANK	CHERRY CREEK MORTGAGE CO., INC
CITIBANK, N.A.	CITICORP TRUST BANK, FSB	CLEVELAND STATE BANK
COLDWAL SAVINGS, F. A.	COMMERCE STATE BANK	COMMUNITY BANK & TRUST
CORNERSTONE NATIONAL BANK & TR	COVANTAGE CREDIT UNION	CRESCENT MORTGAGE COMPANY
Deere Employees Credit Union	DENMARK STATE BANK	DIGITAL FEDERAL CREDIT UNION
DODGE CENTRAL CREDIT UNION	EAST WISCONSIN SAVINGS BANK SA	EDUCATORS CREDIT UNION
EVERBANK	EVERETT FINANCIAL INC.	FARMERS & MERCHANTS UNION BANK
FIRST AMERICAN BANK	FIRST BANK FINANCIAL CENTRE	FIRST BUSINESS BANK
FIRST CHOICE BANK	FIRST CHOICE LOAN SERVICES INC	FIRST COMMUNITY FCU
FIRST FEDERAL BANK OF FLORIDA	FIRST FEDERAL BANK, FSB	FIRST FEDERAL SAVINGS BANK
FIRST NATIONAL BANK	FIRST NATIONAL BANK OF AMERICA	FIRST NATIONAL BANK OF OMAHA
FIRST STATE BANK	FIRST-CITIZENS BANK & TRUST CO	FLAGSTAR BANK
FOND DU LAC CREDIT UNION	GENERATION MORTGAGE COMPANY	GOLD STAR MORTGAGE FINANCIAL
GRAND BANK NA	GREAT MIDWEST BANK, SSB	GREENLEAF WAYSIDE BANK
GREENLIGHT FINANCIAL SERVICES	GREENSTONE FARM CREDIT SERVICE	GREENWOOD'S STATE BANK
GUARANTEED RATE INC	GUARANTY BANK, FSB	GUARDIAN CREDIT UNION
HOME SAVINGS OF AMERICA	HOME SERVICES LENDING, LLC	HOMETOWN BANK
ING BANK, FSB	INTEGRITY FIRST BANK	INTERCONTINENTAL CAPITAL GROUP
ISB COMMUNITY BANK	JAMES B. NUTTER & CO.	JOHNSON BANK
KINNECTA FEDERAL CREDIT UNION	Kohler Credit Union	LAKE MICHIGAN CREDIT UNION
LANDMARK CREDIT UNION	M&J BANK FSB	MARINE CREDIT UNION
MARKETPLACE HOME MORTGAGE LLC	MERRILL LYNCH CREDIT CORP	METLIFE BANK, N.A.
MIDDLETON COMMUNITY BANK	MIDWEST COMMUNITY BANK	MORTGAGE RESEARCH CENTER, LLC
NATIONAL EXCHANGE B&T	NATIONS LENDING CORPORATION	NATIONWIDE ADVANTAGE MORTGAGE
NATIONWIDE BANK	NEW AMERICAN FUNDING	NEW YORK COMMUNITY BANK
NFCU	NICOLET NATIONAL BANK	NORTH AMERICAN SAVINGS BANK
ONE REVERSE MORTGAGE, LLC	PENNYMAC LOAN SERVICES LLC	PENTAGON FEDERAL CREDIT UNION
PHH HOME LOANS	PIONEER CREDIT UNION	PLATINUM HOME MORTGAGE CORP
PNC BANK, N.A.	PORT WASHINGTON STATE BANK	PREMIER COMMUNITY BANK
PROSPECT MORTGAGE LLC	PYRAMAX BANK, FSB	RIDGESTONE BANK
ROCKY MOUNTAIN B&TC FLORENCE	SELFRELIANCE UAFCU	SHORE MORTGAGE
STARION FINANCIAL	STATE BANK OF CHILTON	STATE BANK OF CROSS PLAINS
STATE FARM BANK	STIEGL BANK & TRUST	STONEGATE MORTGAGE LLC
Summit Credit Union	SUMMIT MORTGAGE CORPORATION	SUN WEST MORTGAGE COMPANY, INC
TCP NATIONAL BANK	TEXAS STAR BANK SSB	THE BANK OF KAUKAUNA
THE BUSINESS BANK	THE EQUITABLE BANK SSB	THE HUNTINGTON NATIONAL BANK

Report Date: 06/04/2012

INSTITUTIONS WHO DO NOT HAVE A HOME OR BRANCH OFFICE IN THE MSAMD

THE NATIONAL BANK OF WAUWATON  
THRIVENT FINANCIAL BANK  
TRUHOME SOLUTIONS, LLC  
URBAN FINANCIAL GROUP INC.  
VILLAGE CAPITAL & INVESTMENT  
WESTBURY BANK  
WINGS FINANCIAL CREDIT UNION  
WOLF RIVER COMMUNITY BANK

THE PARK BANK  
TIME FEDERAL SAVINGS BANK  
UNION BANK & TRUST COMPANY  
US BANK NORTH DAKOTA  
WATERSTONE BANK SSB  
WESTCONSIN CREDIT UNION  
WISCONSIN COMMUNITY BANK  
WOODTRUST BANK N.A.

THE PRIVATEBANK AND TRUST CO.  
TOWER CREDIT UNION  
UNITED SECURITY FINANCIAL  
USAA FEDERAL SAVINGS BANK  
WEICHERT FINANCIAL SERVICES  
WESTSTAR MORTGAGE INC  
WISCONSIN MORTGAGE CORPORATION

Report Date: 06/04/2012

ALL LOANS ON PROPERTY LOCATED IN MSAMD 3'

MSAMD: 36780 - OSHKOSH-NEENAH, WI

CENSUS TRACT OR COUNTY NAME AND DISPOSITION OF APPLICATION 1/ (STATE/COUNTY/TRACT NUMBER)	Loans on 1- to 4-Family and Manufactured Home Dwellings													% Min Rep 4/	Median Income As PCT of MSAMD Median		
	Home Purchase Loans				Refinancings	Home Improvement Loans				Loans on Dwellings For 5 or More Families		Nonoccupant Loans From Columns A, B, C and D				Loans On Manufactured Home Dwellings From Columns A, B, C & D	
	FHA, FSARHS & VA		Conventional			C		D		E		F				G	
	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															7	80	
LOANS ORIGINATED	3	232	7	382	54	4394	3	96			11	796					
APPS APPROVED, NOT ACCEPTED			1	97	3	208											
APPS DENIED	4	248	3	342	20	1881	1	18			2	289					
APPS WITHDRAWN			1	63	11	990					1	85					
FILES CLOSED FOR INCOMPLETENESS					5	347					1	70					
WINNEBAGO COUNTY/0002.00															13	89	
LOANS ORIGINATED	6	459	14	1104	39	3668	7	487	1	640	11	799					
APPS APPROVED, NOT ACCEPTED					5	371	1	11									
APPS DENIED			2	86	12	990	3	117			1	32					
APPS WITHDRAWN	1	33			6	549											
FILES CLOSED FOR INCOMPLETENESS			1	96	2	162											
WINNEBAGO COUNTY/0003.00															7	110	
LOANS ORIGINATED	10	1298	23	2334	80	11250	10	736	3	640	15	1347					
APPS APPROVED, NOT ACCEPTED	2	280	1	56	7	830	1	70			1	60					
APPS DENIED	4	447	2	138	25	4223	3	194			2	211					
APPS WITHDRAWN	1	62	2	216	18	2456					1	57					
FILES CLOSED FOR INCOMPLETENESS					10	1319											
WINNEBAGO COUNTY/0004.00															7	91	
LOANS ORIGINATED	3	194	15	861	36	2752	7	171			11	560					
APPS APPROVED, NOT ACCEPTED	1	40	1	55	7	372											
APPS DENIED	4	202	3	139	20	1487	2	17			2	68					
APPS WITHDRAWN	2	170			11	810											
FILES CLOSED FOR INCOMPLETENESS					2	155					1	68					
WINNEBAGO COUNTY/0005.00															12	80	
LOANS ORIGINATED	7	611	19	1167	50	3301	8	245			23	1364					
APPS APPROVED, NOT ACCEPTED					2	118	1	11			1	11					
APPS DENIED			1	81	16	1486	2	6			6	443					
APPS WITHDRAWN			1	59	11	812					1	62					
FILES CLOSED FOR INCOMPLETENESS					6	371	1	32									

Report Date: 09/04/2012



ALL LOANS ON PROPERTY LOCATED IN MSAMD 3'

MSAMD: 36780 - OSHKOSH-NEENAH, WI

CENSUS TRACT OR COUNTY NAME AND DISPOSITION OF APPLICATION 1/ (STATE/COUNTY/TRACT NUMBER)	Loans on 1- to 4-Family and Manufactured Home Dwellings													% Min Rep 4/	Median Income As PCT of MSAMD Median		
	Home Purchase Loans						Refinancings	Home Improvement Loans		Loans on Dwellings For 5 or More Families		Nonoccupant Loans From Columns A, B, C and D				Loans On Manufactured Home Dwellings From Columns A, B, C & D	
	FHA, FSARHS & VA		Conventional		C			D		E		F				G	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number			\$000's	
WINNEBAGO COUNTY0007.00															5	86	
LOANS ORIGINATED			7	840	7	1524	2	58	1	998	12	2085					
APPS APPROVED, NOT ACCEPTED					1	84											
APPS DENIED					5	283					2	121					
APPS WITHDRAWN					2	544											
FILES CLOSED FOR INCOMPLETENESS																	
WINNEBAGO COUNTY0008.00															7	83	
LOANS ORIGINATED	6	527	25	1659	63	5695	5	130			9	602					
APPS APPROVED, NOT ACCEPTED	1	84			4	277					1	35					
APPS DENIED	3	239	2	142	20	1683	2	57			1	94					
APPS WITHDRAWN	1	66	2	179	15	1575											
FILES CLOSED FOR INCOMPLETENESS					4	292	1	70			1	38					
WINNEBAGO COUNTY0009.00															8	83	
LOANS ORIGINATED	7	903	16	1409	68	6633	6	362	3	4636	9	668					
APPS APPROVED, NOT ACCEPTED			1	162	9	721											
APPS DENIED	1	117	4	352	22	2052	6	150									
APPS WITHDRAWN			3	366	9	1005	1	10									
FILES CLOSED FOR INCOMPLETENESS					4	489	1	5									
WINNEBAGO COUNTY0010.00															7	88	
LOANS ORIGINATED	4	272	12	1210	48	3622	5	117			4	173					
APPS APPROVED, NOT ACCEPTED					5	325	1	3									
APPS DENIED			1	88	15	1320	1	5									
APPS WITHDRAWN			1	171	8	654	1	45									
FILES CLOSED FOR INCOMPLETENESS					1	58											
WINNEBAGO COUNTY0011.00															6	83	
LOANS ORIGINATED	15	1579	9	728	77	6785	7	1357	1	638	8	1429					
APPS APPROVED, NOT ACCEPTED					5	350											
APPS DENIED	2	154	4	215	13	1159	3	48			3	123					
APPS WITHDRAWN	1	157	1	78	10	945	3	93			3	247					
FILES CLOSED FOR INCOMPLETENESS					3	318											

Report Date: 09/04/2012

ALL LOANS ON PROPERTY LOCATED IN MSAMD 3)

MSAMD: 36780 - OSHKOSH-NEENAH, WI

CENSUS TRACT OR COUNTY NAME AND DISPOSITION OF APPLICATION 1/ (STATE/COUNTY/TRACT NUMBER)	Loans on 1- to 4-Family and Manufactured Home Dwellings														% Min Pop 4/	Median Income As PCT of MSAMD Median
	Home Purchase Loans								Loans on Dwellings For 5 or More Families	Nonoccupant Loans From Columns A, B, C and D	Loans On Manufactured Home Dwellings From Columns A, B, C & D					
	FHA, FSARHS & VA		Conventional		Refinancings		Home Improvement Loans				E	F	G			
	A	B	C	D	E	F	G	Number	\$000's	Number			\$000's			
WINNEBAGO COUNTY/0012.00															6	72
LOANS ORIGINATED	7	962	17	851	21	1526	5	153			12	723				
APPS APPROVED, NOT ACCEPTED			1	25												
APPS DENIED	2	83	5	356	15	1022	1	25			1	20				
APPS WITHDRAWN	1	42			10	692					3	169				
FILES CLOSED FOR INCOMPLETENESS			1	56	3	233	1	73			1	73				
WINNEBAGO COUNTY/0013.00															5	85
LOANS ORIGINATED	5	432	11	831	49	3819	12	273	1	2100	12	1049				
APPS APPROVED, NOT ACCEPTED			1	59	4	273					1	91				
APPS DENIED	1	104	2	174	19	1708	1	25			1	68				
APPS WITHDRAWN					9	755										
FILES CLOSED FOR INCOMPLETENESS					2	166										
WINNEBAGO COUNTY/0014.00															4	93
LOANS ORIGINATED	8	764	30	2111	69	5688	9	321			12	828	4	83		
APPS APPROVED, NOT ACCEPTED			2	103	5	437					1	70	1	20		
APPS DENIED	3	241	2	97	23	2395	4	223			1	30	1	17		
APPS WITHDRAWN	1	97			16	1566										
FILES CLOSED FOR INCOMPLETENESS			1	53	4	439										
WINNEBAGO COUNTY/0015.00															7	90
LOANS ORIGINATED	9	843	20	1908	60	5295	9	435			11	829				
APPS APPROVED, NOT ACCEPTED			1	68	4	287					1	68				
APPS DENIED			1	29	22	1852	2	236			1	160				
APPS WITHDRAWN	1	62			15	1340					2	144				
FILES CLOSED FOR INCOMPLETENESS					1	51										
WINNEBAGO COUNTY/0016.00															12	112
LOANS ORIGINATED	5	500	17	2340	67	9685	7	565			6	736	3	29		
APPS APPROVED, NOT ACCEPTED					3	325										
APPS DENIED			1	16	18	2320	2	140			2	329	1	16		
APPS WITHDRAWN			2	26	9	1187									2	26
FILES CLOSED FOR INCOMPLETENESS					4	506										

Report Date: 09/04/2012

ALL LOANS ON PROPERTY LOCATED IN MSAMD 3)

MSAMD: 36780 - OSHKOSH-NEENAH, WI

CENSUS TRACT OR COUNTY NAME AND DISPOSITION OF APPLICATION 1/ (STATE/COUNTY/TRACT NUMBER)	Loans on 1- to 4-Family and Manufactured Home Dwellings														% Min Pop 4/	Median Income As PCT of MSAMD Median		
	Home Purchase Loans								Loans on Dwellings For 5 or More Families	Nonoccupant Loans From Columns A, B, C and D	Loans On Manufactured Home Dwellings From Columns A, B, C & D							
	FHA, FSARHS & VA		Conventional		Refinancings		Home Improvement Loans				E		F				G	
	A	B	C	D	E	F	G	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/0017.00															21	99		
LOANS ORIGINATED	5	704	21	2317	86	18198	4	383			5	1367	9	208				
APPS APPROVED, NOT ACCEPTED	3	529	1	13	6	925	1	235			1	27	1	13				
APPS DENIED	1	159	3	164	20	4714					1	404	2	40				
APPS WITHDRAWN			4	66	12	2869	1	20					3	42				
FILES CLOSED FOR INCOMPLETENESS					3	271												
WINNEBAGO COUNTY/0018.00															4	124		
LOANS ORIGINATED	31	4955	133	20704	579	83133	35	2969			20	4181						
APPS APPROVED, NOT ACCEPTED			8	1618	40	5727	1	110			1	112						
APPS DENIED	9	1175	14	1787	85	11842	5	572			4	531						
APPS WITHDRAWN			2	355	52	7491	3	281										
FILES CLOSED FOR INCOMPLETENESS	1	160	2	518	19	2759												
WINNEBAGO COUNTY/0019.00															2	112		
LOANS ORIGINATED	11	1774	27	3856	190	27718	8	971	1	5150	16	3140						
APPS APPROVED, NOT ACCEPTED			3	454	8	1240	2	208	1	5000	1	276						
APPS DENIED	3	302	8	1253	37	5121	2	139			2	387						
APPS WITHDRAWN	2	225	4	580	23	10057	1	350			4	7556						
FILES CLOSED FOR INCOMPLETENESS			1	85	11	1788					1	130						
WINNEBAGO COUNTY/0020.00															3	97		
LOANS ORIGINATED	17	1989	48	7157	287	25751	21	1567			13	1615						
APPS APPROVED, NOT ACCEPTED	2	178	4	871	11	1869					1	180						
APPS DENIED	5	640	6	388	55	7238	5	51			2	110	1	10				
APPS WITHDRAWN	2	317	3	408	21	3075					4	689						
FILES CLOSED FOR INCOMPLETENESS	2	86			7	722												
WINNEBAGO COUNTY/0021.00															2	102		
LOANS ORIGINATED			14	1831	111	15343	13	327			14	2122						
APPS APPROVED, NOT ACCEPTED			2	290	10	1222	1	33			1	180						
APPS DENIED			3	437	30	4226	1	19			3	308						
APPS WITHDRAWN			2	72	14	1885					1	92						
FILES CLOSED FOR INCOMPLETENESS					5	670	1	113										

Report Date: 06/04/2012

ALL LOANS ON PROPERTY LOCATED IN MSAMD 3<sup>1</sup>

MSAMD: 36780 - OSHKOSH-NEENAH, WI

CENSUS TRACT OR COUNTY NAME AND DISPOSITION OF APPLICATION 1/ (STATE/COUNTY/TRACT NUMBER)	Loans on 1- to 4-Family and Manufactured Home Dwellings														% Min Pct of MSAMD Median	Median Income As Pct of MSAMD Median
	Home Purchase Loans								Loans on Dwellings For 5 or More Families	Nonoccupant Loans From Columns A, B, C and D	Loans On Manufactured Home Dwellings From Columns A, B, C & D					
	FHA, FSARHS & VA		Conventional		Refinancings		Home Improvement Loans				E	F	G			
	A	B	C	D	E	F	G									
Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's			
WINNEBAGO COUNTY/0022.00															1	109
LOANS ORIGINATED	22	3079	48	8336	318	48964	24	2126	2	4182	39	7349	3	268		
APPS APPROVED, NOT ACCEPTED			3	633	21	3185	3	123			2	168				
APPS DENIED	5	417	5	614	88	9824	7	117			10	1243				
APPS WITHDRAWN	2	147	4	386	45	7388	6	1021			5	676				
FILES CLOSED FOR INCOMPLETENESS			1	90	12	2867					1	133				
WINNEBAGO COUNTY/0023.00															2	121
LOANS ORIGINATED	9	1482	38	7248	271	49897	27	1609			5	644				
APPS APPROVED, NOT ACCEPTED			2	445	10	1534	3	26								
APPS DENIED	1	92	5	753	43	9116	3	47			5	949	1	115		
APPS WITHDRAWN	1	156	3	603	33	6536	1	6								
FILES CLOSED FOR INCOMPLETENESS					10	2258										
WINNEBAGO COUNTY/0024.00															4	123
LOANS ORIGINATED	25	3540	65	7911	300	38323	27	1289	2	9089	12	2739	10	239		
APPS APPROVED, NOT ACCEPTED	2	208	3	503	16	2589										
APPS DENIED	2	312	10	844	62	9762	3	165			10	1527	8	240		
APPS WITHDRAWN	3	466	12	680	50	8219	1	15	1	25000	2	338	7	168		
FILES CLOSED FOR INCOMPLETENESS			1	87	11	1469										
WINNEBAGO COUNTY/0025.00															17	80
LOANS ORIGINATED	2	276	22	2038	63	7610	6	86	8	4435	7	567				
APPS APPROVED, NOT ACCEPTED	1	105			8	843					1	85				
APPS DENIED	4	491	2	248	26	2604	1	76	1	1700			1	91		
APPS WITHDRAWN					11	1250				435						
FILES CLOSED FOR INCOMPLETENESS																
WINNEBAGO COUNTY/0026.01															7	100
LOANS ORIGINATED	15	1374	26	2886	89	12314	10	433	1	1010	5	1539				
APPS APPROVED, NOT ACCEPTED					8	725	2	20								
APPS DENIED			1	126	28	4063	7	255	1	1490	3	524				
APPS WITHDRAWN			2	172	15	1950	1	113			1	132	1	18		
FILES CLOSED FOR INCOMPLETENESS					4	952					1	230				

Report Date: 09/04/2012

ALL LOANS ON PROPERTY LOCATED IN MSAMD 3'

MSAMD: 36780 - OSHKOSH-NEENAH, WI

CENSUS TRACT OR COUNTY NAME AND DISPOSITION OF APPLICATION 1/ (STATE/COUNTY/TRACT NUMBER)	Loans on 1- to 4-Family and Manufactured Home Dwellings													% Min Pop 4/	Median Income As PCT of MSAMD Median	
	Home Purchase Loans				Refinancings		Home Improvement Loans		Loans on Dwellings For 5 or More Families		Nonoccupant Loans From Columns A, B, C and D		Loans On Manufactured Home Dwellings From Columns A, B, C & D			
	FHA, FSARHS & VA		Conventional		C		D		E		F		G			
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number			\$000's
<b>WINNEBAGO COUNTY/0026.02</b>															5	108
LOANS ORIGINATED	4	491	13	1271	95	8966	11	388	1	1500	5	362				
APPS APPROVED, NOT ACCEPTED					7	810			1	5650						
APPS DENIED			3	510	25	3882	1	14			3	236				
APPS WITHDRAWN	1	86			10	1016					1	75				
FILES CLOSED FOR INCOMPLETENESS					5	606										
<b>WINNEBAGO COUNTY/0027.00</b>															5	88
LOANS ORIGINATED	9	731	19	1775	68	4977	12	476			8	614				
APPS APPROVED, NOT ACCEPTED	1	60			8	425										
APPS DENIED	4	390	2	83	16	1374	3	82			1	49				
APPS WITHDRAWN	2	217	3	902	10	855	2	101			1	99				
FILES CLOSED FOR INCOMPLETENESS					4	317										
<b>WINNEBAGO COUNTY/0028.00</b>															8	85
LOANS ORIGINATED	15	1319	29	2219	91	7250	11	545			14	1173	6	185		
APPS APPROVED, NOT ACCEPTED	2	106	4	496	7	527	1	7			1	86				
APPS DENIED	3	219	4	140	24	2196	6	180			4	383	1	1		
APPS WITHDRAWN	1	89	3	364	26	2208	1	11			2	92				
FILES CLOSED FOR INCOMPLETENESS					6	468										
<b>WINNEBAGO COUNTY/0029.00</b>															10	69
LOANS ORIGINATED	2	114	7	638	27	1930	2	27			10	673				
APPS APPROVED, NOT ACCEPTED					2	122	1	100								
APPS DENIED	2	250	1	23	12	1007	4	245			4	268				
APPS WITHDRAWN	3	171	1	63	5	465	2	8								
FILES CLOSED FOR INCOMPLETENESS					1	62					1	62				
<b>WINNEBAGO COUNTY/0030.00</b>															4	107
LOANS ORIGINATED	3	362	8	353	40	4286	7	638			8	369				
APPS APPROVED, NOT ACCEPTED					7	691										
APPS DENIED	2	89	2	152	13	1239	2	79			1	5				
APPS WITHDRAWN			1	28	10	1209										
FILES CLOSED FOR INCOMPLETENESS					2	268										

Report Date: 09/04/2012

ALL LOANS ON PROPERTY LOCATED IN MSAMD 3'

MSAMD: 36780 - OSHKOSH-NEENAH, WI

CENSUS TRACT OR COUNTY NAME AND DISPOSITION OF APPLICATION 1/ (STATE/COUNTY/TRACT NUMBER)	Loans on 1- to 4-Family and Manufactured Home Dwellings												% Min Rep 4/	Median Income As PCT of MSAMD Median	
	Home Purchase Loans				Refinancings	Home Improvement Loans		Loans on Dwellings For 5 or More Families		Nonoccupant Loans From Columns A, B, C and D		Loans On Manufactured Home Dwellings From Columns A, B, C & D			
	FHA, FSARHS & VA		Conventional			D		E		F		G			
	A	B	C	D	E	F	G	Number	\$000's	Number	\$000's				
WINNEBAGO COUNTY/0031.00													4	100	
LOANS ORIGINATED	7	816	12	1306	52	7502	8	253			5	258			
APPS APPROVED, NOT ACCEPTED			2	111	3	246	1	15	1	461					
APPS DENIED	2	128	1	35	8	735					1	353			
APPS WITHDRAWN			2	257	6	480									
FILES CLOSED FOR INCOMPLETENESS				2	178			1	247						
WINNEBAGO COUNTY/0032.00													4	103	
LOANS ORIGINATED	6	758	27	3944	76	11319	9	515			11	1499			
APPS APPROVED, NOT ACCEPTED	1	210	1	50	3	220	2	204							
APPS DENIED	4	359	1	25	19	3787	2	9			2	997			
APPS WITHDRAWN	1	134	1	124	16	2563					1	68			
FILES CLOSED FOR INCOMPLETENESS	1	46		3	418										
WINNEBAGO COUNTY/0033.00													6	87	
LOANS ORIGINATED	7	578	18	1589	66	4646	10	345			11	710			
APPS APPROVED, NOT ACCEPTED	2	142		2	93										
APPS DENIED	1	59	3	175	16	1332	4	30			3	297			
APPS WITHDRAWN	2	106	3	167	13	950					1	46			
FILES CLOSED FOR INCOMPLETENESS				1	61										
WINNEBAGO COUNTY/0034.00													5	91	
LOANS ORIGINATED	18	1681	25	1724	77	4992	11	421	1	2058	10	623			
APPS APPROVED, NOT ACCEPTED			5	258	9	711	1	16			2	137			
APPS DENIED	1	58	2	127	36	3032	7	225			5	241			
APPS WITHDRAWN			2	126	17	1526	3	38							
FILES CLOSED FOR INCOMPLETENESS			1	83	3	245					1	74			
WINNEBAGO COUNTY/0035.00													8	79	
LOANS ORIGINATED	8	645	11	1032	37	2915	6	94	1	200	3	324			
APPS APPROVED, NOT ACCEPTED			1	48	2	97					1	48			
APPS DENIED	1	83	1	55	19	1726	4	26			5	477			
APPS WITHDRAWN				?	?	607									
FILES CLOSED FOR INCOMPLETENESS	1	112		2	106										

Report Date: 09/04/2012

ALL LOANS ON PROPERTY LOCATED IN MSAMD 3/

MSAMD: 36780 - OSHKOSH-NEENAH, WI

CENSUS TRACT OR COUNTY NAME AND DISPOSITION OF APPLICATION 1/ (STATE/COUNTY/TRACT NUMBER)	Loans on 1- to 4-Family and Manufactured Home Dwellings												% Min Pop 4/	Median Income As PCT of MSAMD Median
	Home Purchase Loans				Refinancings	Home Improvement Loans		Loans on Dwellings For 5 or More Families	Nonoccupant Loans From Columns A, B, C and D	Loans On Manufactured Home Dwellings From Columns A, B, C & D				
	FHA, FSARHS & VA		Conventional			D				G				
	A	B	C	D	E	F	G							
WINNEBAGO COUNTY/0036.00	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	3	139
LOANS ORIGINATED	15	2206	37	7263	157	2438L	10	1090	7	796				
APPS APPROVED, NOT ACCEPTED			3	445	10	2317			1	92				
APPS DENIED	2	217	1	30	28	9373	2	25	1	30				
APPS WITHDRAWN	2	300	9	965	30	4819	3	100	1	30				
FILES CLOSED FOR INCOMPLETENESS			2	205	4	938								
WINNEBAGO COUNTY/0037.01	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	6	101
LOANS ORIGINATED	14	1960	25	2964	85	7634	14	369	7	695				
APPS APPROVED, NOT ACCEPTED					4	404	1	4						
APPS DENIED	3	459	1	112	18	1758	3	73	3	381				
APPS WITHDRAWN			2	445	15	1645			2	226				
FILES CLOSED FOR INCOMPLETENESS					6	629								
WINNEBAGO COUNTY/0037.02	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	3	117
LOANS ORIGINATED	19	3429	88	14477	363	5305L	31	2300	8	904				
APPS APPROVED, NOT ACCEPTED	1	111	2	272	14	2748								
APPS DENIED	2	350	7	1200	68	1046L	8	648	3	424				
APPS WITHDRAWN	1	100	7	944	24	3763			1	132	1	30		
FILES CLOSED FOR INCOMPLETENESS					16	303L	1	12						
MSAMD(TOTAL)	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	0	0
LOANS ORIGINATED	357	42679	1001	124303	4236	543256	419	24736	27	37276	407	48271	35	1011
APPS APPROVED, NOT ACCEPTED	19	2053	53	8921	278	33768	24	1286	3	1111	19	1726	2	33
APPS DENIED	81	8063	119	11234	101L	136042	113	4279	2	3190	101	12132	16	530
APPS WITHDRAWN	52	3203	83	8263	625	89956	31	2221	2	25435	38	11044	14	282
FILES CLOSED FOR INCOMPLETENESS	5	413	11	1245	188	25982	6	305	1	247	9	878		
INVALID GEOGRAPHIC IDENTIFIERS 2/	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	0	0
LOANS ORIGINATED														
APPS APPROVED, NOT ACCEPTED														
APPS DENIED														
APPS WITHDRAWN														
FILES CLOSED FOR INCOMPLETENESS														

Report Date: 09/04/2012

ALL LOANS ON PROPERTY LOCATED IN MSA/MD 3/

MSA/MD: 36780 - OSHKOSH-NEENAH, WI

CENSUS TRACT OR COUNTY NAME 1/ (STATE/COUNTY/TRACT NUMBER)	Loans on 1- to 4-Family and Manufactured Home Dwellings													
	Home Purchase Loans								Loans on Dwellings For 5 or More Families		Nonoccupant Loans From Columns A, B, C & D		Loans on Manufactured Home Dwellings From Columns A,B,C & D	
	FHA, FSA/RHS & VA		Conventional		Refinancings		Home Improvement Loans		E		F		G	
	A	B	C	D	E	F	G	Number	\$000's	Number	\$000's	Number	\$000's	
WWWNEBAGO COUNTY0001.00	4	352	1	108	13	1482					1	180		
WWWNEBAGO COUNTY0002.00	6	369	1	107	9	771					1	35		
WWWNEBAGO COUNTY0003.00	4	608	6	724	15	2741	1	100						
WWWNEBAGO COUNTY0004.00	2	176			6	479								
WWWNEBAGO COUNTY0005.00	10	823			6	682								
WWWNEBAGO COUNTY0007.00					1	152								
WWWNEBAGO COUNTY0008.00	8	691	2	197	13	1015					1	60		
WWWNEBAGO COUNTY0009.00	6	792	1	90	13	1575					1	112		
WWWNEBAGO COUNTY0010.00	2	204	1	147	5	448								
WWWNEBAGO COUNTY0011.00	7	773	2	170	13	1295					1	90		
WWWNEBAGO COUNTY0012.00	9	742	5	225	6	524					2	92		
WWWNEBAGO COUNTY0013.00	6	533			16	1527	1	130						
WWWNEBAGO COUNTY0014.00	1	86	5	471	10	1013								
WWWNEBAGO COUNTY0015.00	4	423	1	68	10	907								
WWWNEBAGO COUNTY0016.00	4	479	2	487	11	1971								
WWWNEBAGO COUNTY0017.00	3	372	3	430	17	3148					1	126		
WWWNEBAGO COUNTY0018.00	16	2578	23	3584	95	16077	3	396			5	734		
WWWNEBAGO COUNTY0019.00	8	1299	1	105	31	4425					2	318		
WWWNEBAGO COUNTY0020.00	12	1388	8	1201	38	4947	1	104			3	592		
WWWNEBAGO COUNTY0021.00	1	151	2	336	13	2086	1	290			3	439		
WWWNEBAGO COUNTY0022.00	16	2453	15	2896	55	9920	1	37			9	1631		
WWWNEBAGO COUNTY0023.00	5	1056	12	2382	57	13404	5	526			2	721		
WWWNEBAGO COUNTY0024.00	23	3183	19	2451	72	11406	1	163			1	391		
WWWNEBAGO COUNTY0025.00	2	189	5	431	11	1260	1	102						
WWWNEBAGO COUNTY0026.01	20	2021	4	1225	29	4228	2	191						
WWWNEBAGO COUNTY0026.02	4	517	5	518	18	1940					1	85		
WWWNEBAGO COUNTY0027.00	8	547	13	1285	14	1272					3	177		

Report Date: 08/04/2012



ALL LOANS ON PROPERTY LOCATED IN MSA/MD 3/

MSA/MD: 36780 - OSHKOSH-NEENAH, WI

CENSUS TRACT OR COUNTY NAME 1/ (STATE/COUNTY/TRACT NUMBER)	Loans on 1- to 4-Family and Manufactured Home Dwellings													
	Home Purchase Loans								Loans on Dwellings For 5 or More Families	Nonoccupant Loans From Columns A, B, C & D		Loans on Manufactured Home Dwellings From Columns A, B, C & D		
	FHA, FSA/RHS & VA		Conventional		Refinancings		Home Improvement Loans							
	A		B		C		D		E		F		G	
Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	
WWWNEBAGO COUNTY0028.00	8	599	4	229	21	2166					3	265		
WWWNEBAGO COUNTY0029.00	6	422	1	144	1	62								
WWWNEBAGO COUNTY0030.00	5	644	1	95	12	1083					1	90		
WWWNEBAGO COUNTY0031.00	6	521	2	225	7	937								
WWWNEBAGO COUNTY0032.00	5	588	4	305	14	2185					1	70		
WWWNEBAGO COUNTY0033.00	6	452	4	199	9	768					1	17		
WWWNEBAGO COUNTY0034.00	11	898	5	321	11	1039					1	56		
WWWNEBAGO COUNTY0035.00	4	359	1	65	9	905	1	109						
WWWNEBAGO COUNTY0036.00	9	1130	9	1576	21	3676	1	48			2	321		
WWWNEBAGO COUNTY0037.01	8	841	6	608	5	586	1	157						
WWWNEBAGO COUNTY0037.02	9	1500	21	2896	62	10487	1	100						
MSA/MD (TOTAL)	268	30759	195	26281	787	114446	21	2453			46	6602		
INVALID GEOGRAPHIC IDENTIFIERS 2/														

Report Date: 08/04/2012

MSAMD: 36780 - OSHKOSH-NEENAH, WI

BORROWER OR CENSUS TRACT CHARACTERISTICS	FANNIE MAE		GINNIE MAE		FREDDIE MAC		FARMER MAC		PRIVATE SECURITIZATION		COMMERCIAL BANK, SAVINGS ASSOC		INSURANCE CO, CREDIT UNION, MORTGAGE BK, OR FINANCE CO		AFFILIATE INSTITUTION		OTHER PURCHASER	
	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
<b>BORROWER CHARACTERISTICS</b>																		
<b>RACE 5/</b>																		
AMERICAN INDIAN/ALASKA NATIVE	1	86			1	66					1	417	2	68				
ASIAN	22	3244	10	1231	5	644					6	776						
BLACK OR AFRICAN AMERICAN			1	114	2	259												
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND					1	121												
WHITE	1820	243615	547	69822	560	82766	18	2096	571	79446	89	11170	97	12574	331	52794		
<b>2 OR MORE MINORITY RACES</b>																		
JOINT (WHITE/MINORITY RACE)	15	2492	4	554	4	515					5	886		1	184	1	117	
RACE NOT AVAILABLE 6/	163	24276	75	10126	38	6124			7	866	48	8157	9	1328	76	11167	5	909
<b>ETHNICITY 7/</b>																		
HISPANIC OR LATINO	6	598	5	575	4	462					3	298	2	362	3	423	1	112
NOT HISPANIC OR LATINO	1832	246298	951	70015	956	83666	18	2068	575	80317	86	10272	94	12265	329	52905		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	12	1314	8	1080	2	230					4	652	1	171	1	70	1	154
ETHNICITY NOT AVAILABLE 8/	171	25503	73	10177	39	6228			7	894	49	8415	12	1761	76	11167	6	1049
<b>MINORITY STATUS 8/</b>																		
WHITE NON-HISPANIC	1787	239489	530	67409	553	81961			17	1968	562	78135	83	10204	93	12081	328	52388
OTHERS, INCLUDING HISPANIC	56	7734	28	3954	19	2306					19	3029	5	601	5	677	3	383
<b>INCOME 9/</b>																		
LESS THAN 50% OF MSA/MD MEDIAN	87	6213	58	4640	22	2053			3	276	48	3468	8	572	8	592	11	808
50-79% OF MSA/MD MEDIAN	319	29418	137	14030	83	7778			3	253	125	12388	26	2411	31	3157	43	3889
80-99% OF MSA/MD MEDIAN	266	30025	93	11396	64	7432			4	465	86	9802	13	1528	22	2387	31	3407
100-119% OF MSA/MD MEDIAN	225	25630	66	9478	57	7202			4	466	64	9242	15	1622	23	2889	34	4118
120% OR MORE OF MSA/MD MEDIAN	952	164030	125	20562	321	57071			11	1502	252	46058	27	4950	63	11880	210	40050
INCOME NOT AVAILABLE 6/	142	18397	158	21741	64	8959					56	8724	11	1483	27	3010	8	1548
<b>CENSUS TRACT CHARACTERISTICS 10/</b>																		
<b>RACIALETHNIC COMPOSITION 11/</b>																		
LESS THAN 10% MINORITY	1885	257010	587	75881	559	82682			23	2709	586	83662	96	11859	162	22367	321	51689
10-19% MINORITY	99	10439	37	3966	38	5163			1	136	35	4245	1	99	10	1222	11	1312
20-49% MINORITY	37	6264	13	2000	14	2650			1	117	10	1775	3	608	2	336	5	819
50-79% MINORITY																		
80-100% MINORITY																		
<b>INCOME 12/ 13/</b>																		
LOW INCOME																		
MODERATE INCOME	59	4681	36	3585	15	1506					25	2066	8	639	7	691	10	741
MIDDLE INCOME	1300	164610	465	56830	380	51605			19	2224	417	55649	60	6744	119	15366	203	31852
UPPER INCOME	662	104422	136	21432	216	37384			6	738	189	31967	32	5183	48	7868	124	21227
TOTAL 14/	2021	273713	637	81847	611	90495			25	2962	631	89682	100	12566	174	23925	337	53820

Report Date: 06/04/2012

MSAND: 36780 - OSHKOSH-NEENAH, WI

PRICING INFORMATION	FANNIE MAE		GINNIE MAE		FREDDIE MAC		FARMER MAC		PRIVATE SECURITIZATION		COMMERCIAL BANK, SAVINGS ASSOC		INSURANCE CO, MORTGAGE BK, OR FINANCE CO		AFFILIATE INSTITUTION		OTHER PURCHASER		
	FIRST LIEN #	JUNIOR LIEN #	FIRST LIEN #	JUNIOR LIEN #	FIRST LIEN #	JUNIOR LIEN #	FIRST LIEN #	JUNIOR LIEN #	FIRST LIEN #	JUNIOR LIEN #	FIRST LIEN #	JUNIOR LIEN #	FIRST LIEN #	JUNIOR LIEN #	FIRST LIEN #	JUNIOR LIEN #	FIRST LIEN #	JUNIOR LIEN #	
	NO REPORTED PRICING DATA <sup>15/</sup>	1579		314		494				25		592	2	85	3	88		329	1
REPORTED PRICING DATA	5		5		2						1		2	1	1				
PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD <sup>16/</sup>																			
1.00 - 1.99	5	NA	3	NA	2	NA	NA	NA	NA	1	NA	2	NA	1	NA	NA	NA	NA	
2.00 - 2.49		NA	1	NA		NA	NA	NA	NA		NA		NA		NA	NA	NA	NA	
2.50 - 2.99		NA	1	NA		NA	NA	NA	NA		NA		NA		NA	NA	NA	NA	
3.00 - 3.49		NA		NA		NA	NA	NA	NA		NA		NA		NA	NA	NA	NA	
3.50 - 4.49																			
4.50 - 5.49														1					
5.50 - 6.49																			
6.50 OR MORE																			
MEAN	1.80		2.07		1.75						1.68		1.55	5.21	1.85				
MEDIAN	1.74		1.90		1.75						1.68		1.55	5.21	1.85				
HOEPA LOANS <sup>17/</sup>																			

Report Date: 06/04/2012

MSAND: 36780 - OSHKOSH-NEENAH, WI

PRICING INFORMATION	FANNIE MAE		GINNIE MAE		FREDDIE MAC		FARMER MAC		PRIVATE SECURITIZATION		COMMERCIAL BANK, SAVINGS ASSOC		INSURANCE CO, MORTGAGE BK, OR FINANCE CO		AFFILIATE INSTITUTION		OTHER PURCHASER		
	FIRST LIEN \$000%	JUNIOR LIEN \$000%	FIRST LIEN \$000%	JUNIOR LIEN \$000%	FIRST LIEN \$000%	JUNIOR LIEN \$000%	FIRST LIEN \$000%	JUNIOR LIEN \$000%	FIRST LIEN \$000%	JUNIOR LIEN \$000%	FIRST LIEN \$000%	JUNIOR LIEN \$000%	FIRST LIEN \$000%	JUNIOR LIEN \$000%	FIRST LIEN \$000%	JUNIOR LIEN \$000%	FIRST LIEN \$000%	JUNIOR LIEN \$000%	
	NO REPORTED PRICING DATA 15/	209348		40809		70089				2962		84164	226	11213	69	10982		52996	39
REPORTED PRICING DATA	579		552		241						114		181	11	69				
PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/																			
1.00 - 1.99	579	NA	357	NA	241	NA	NA	NA	NA	114	NA	181	NA	69	NA	NA	NA	NA	
2.00 - 2.49		NA	118	NA		NA	NA	NA	NA		NA		NA		NA	NA	NA	NA	
2.50 - 2.99		NA	77	NA		NA	NA	NA	NA		NA		NA		NA	NA	NA	NA	
3.00 - 3.49		NA		NA		NA	NA	NA	NA		NA		NA		NA	NA	NA	NA	
3.50 - 4.49																			
4.50 - 5.49														11					
5.50 - 6.49																			
6.50 OR MORE																			
MEAN 30/	1.77		2.00		1.75						1.68		1.55	5.21	1.85				
MEDIAN 31/	1.72		1.78		1.69						1.68		1.55	5.21	1.85				
HOEPA LOANS 17/																			

Report Date: 06/04/2012

MSA/MD: 36780 - OSHKOSH-NEENAH, WI

RACE AND GENDER 5/ 18/ 19/	Applications Received 20/		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 INDIAN/ALASKA NATIVE (TOTAL)												
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
ASIAN (TOTAL)	7	853	5	670			1	156	1		27	
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
BLACK OR AFRICAN AMERICAN (TOTAL)	1	140	1	140								
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND (TOTAL)												
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
WHITE (TOTAL)	470	53819	344	41195	19	2053	74	7126	29	2892	5	413
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
2 OR MORE MINORITY RACES (TOTAL)	179	24962	140	20159	8	1014	20	2442	11	1347		
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
JOINT (WHITE/MINORITY RACE) (TOTAL)	2	224	2	224								
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
RACE NOT AVAILABLE (TOTAL) 6/	13	1221	5	510			6	581	2	130		
MALE												
FEMALE												
JOINT (MALE/FEMALE)												

Report Date: 06/04/2012

MSA/MD: 36780 - OSHKOSH-NEENAH, WI

ETHNICITY, GENDER AND INCOME 7/ 18/ 19/	Applications Received 20/		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
HISPANIC OR LATINO (TOTAL)	9	828	5	552			3	164			1	112
MALE	4	357	2	172			1	73			1	112
FEMALE	3	211	1	120			2	91				
JOINT (MALE/FEMALE)	2	260	2	260								
NOT HISPANIC OR LATINO (TOTAL)	470	53836	346	41361	19	2053	70	7015	31	3106	4	301
MALE	182	18375	134	13907	6	480	31	2841	10	987	1	160
FEMALE	108	10457	73	7446	5	559	20	1817	7	494	3	141
JOINT (MALE/FEMALE)	179	24907	139	20008	8	1014	19	2357	13	1528		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO) (TOTAL)	5	634	3	393			2	241				
MALE												
FEMALE												
JOINT (MALE/FEMALE)	5	634	3	393			2	241				
ETHNICITY NOT AVAILABLE (TOTAL) 6/	10	1113	3	373			6	643	1	97		
MALE	5	570					4	473	1	97		
FEMALE												
JOINT (MALE/FEMALE)	2	241	2	241								
MINORITY STATUS 8/ 18/ 19/												
WHITE NON-HISPANIC (TOTAL)	455	52142	335	40037	19	2053	60	6859	28	2892	4	301
MALE	178	17949	130	13472	6	480	31	2841	10	987	1	160
FEMALE	105	10190	71	7212	5	559	20	1817	6	461	3	141
JOINT (MALE/FEMALE)	171	23915	134	19353	8	1014	18	2201	11	1347		
OTHERS, INCLUDING HISPANIC (TOTAL)	25	2833	16	1979			6	961	2	181	1	112
MALE	6	614	4	429			1	73			1	112
FEMALE	4	333	2	242			2	91				
JOINT (MALE/FEMALE)	15	1886	10	1308			3	397	2	181		
INCOME OF APPLICANTS 9/												
LESS THAN 50% OF MSA/MD MEDIAN	89	6653	52	3979	4	269	22	1734	8	530	3	141
50-79% OF MSA/MD MEDIAN	152	15100	113	11600	6	451	24	2375	9	674		
80-99% OF MSA/MD MEDIAN	99	11283	73	8413	4	434	14	1461	8	975		
100-119% OF MSA/MD MEDIAN	52	6825	43	5966			8	747			1	112
120% OR MORE OF MSA/MD MEDIAN	97	15998	73	12350	5	899	11	1569	7	1024	1	160
INCOME NOT AVAILABLE 6/	5	552	3	371			2	181				
TOTAL 14/	494	56411	357	42679	19	2053	81	8063	32	3203	5	413

Report Date: 06/04/2012

MSA/MD: 36780 - OSHKOSH-NEENAH, WI

RACE AND GENDER 5/ 18/ 19/	Applications Received 20/		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 INDIAN/ALASKA NATIVE (TOTAL)	5	174	3	134			1	32	1		8	
MALE												
FEMALE	3	134	2	126					1		8	
JOINT (MALE/FEMALE)	2	40	1	8			1	32				
ASIAN (TOTAL)	18	2145	13	1650			3	336	2		159	
MALE	5	521	3	407			1	71	1		43	
FEMALE	1	93	1	93								
JOINT (MALE/FEMALE)	12	1531	9	1150			2	265	1		116	
BLACK OR AFRICAN AMERICAN (TOTAL)	3	377	1	120			1	222	1		35	
MALE	2	355	1	120					1		35	
FEMALE	1	222					1	222				
JOINT (MALE/FEMALE)												
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND (TOTAL)	1	42	1	42								
MALE	1	42	1	42								
FEMALE												
JOINT (MALE/FEMALE)												
WHITE (TOTAL)	1111	135127	882	111769	48	6174	99	9200	73	7342	9	1652
MALE	313	31962	232	24055	11	1562	37	3674	30	2594	3	567
FEMALE	204	17394	157	14030	14	1598	17	859	13	1161	3	246
JOINT (MALE/FEMALE)	590	85217	492	73056	23	4014	44	4568	29	3427	2	152
2 OR MORE MINORITY RACES (TOTAL)												
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
JOINT (WHITE/MINORITY RACE) (TOTAL)	4	620	2	276			1	220	1		124	
MALE												
FEMALE												
JOINT (MALE/FEMALE)	4	620	2	276			1	220	1		124	
RACE NOT AVAILABLE (TOTAL) 6/	125	13491	99	10812	5	757	14	1134	5		565	2
MALE	5	704	3	556			1	145	1		3	
FEMALE												
JOINT (MALE/FEMALE)	17	2461	12	1776	1	97	2	232	2		356	

Report Date: 06/04/2012

MSA/MD: 36780 - OSHKOSH-NEENAH, WI

ETHNICITY, GENDER AND INCOME 7/ 18/ 19/	Applications Received 20/		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
HISPANIC OR LATINO (TOTAL)	13	756	8	570			3	170	2	16		
MALE	5	222	2	183			1	23	2	16		
FEMALE	2	102	1	51			1	51				
JOINT (MALE/FEMALE)	6	432	5	306			1	96				
NOT HISPANIC OR LATINO (TOTAL)	1108	135207	887	112183	47	5901	96	9191	71	7052	7	890
MALE	308	31232	234	24291	10	792	33	3331	29	2336	2	482
FEMALE	205	17633	159	14188	13	998	17	1030	13	1161	3	246
JOINT (MALE/FEMALE)	593	85993	494	73694	24	4111	45	4641	28	3395	2	152
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO) (TOTAL)	11	1203	6	583			2	348	3	272		
MALE												
FEMALE												
JOINT (MALE/FEMALE)	11	1203	6	583			2	348	3	272		
ETHNICITY NOT AVAILABLE (TOTAL) 6/	135	14810	100	10967	6	1030	18	1529	7	923	4	365
MALE	13	1920	4	706	1	270	5	536	2	323	1	85
FEMALE	2	108			1	100			1	8		
JOINT (MALE/FEMALE)	15	2241	11	1853			2	232	2	356		
MINORITY STATUS 8/ 18/ 19/												
WHITE NON-HISPANIC (TOTAL)	1076	131660	866	109861	46	5804	90	8381	67	6734	7	890
MALE	300	30514	229	23722	10	792	32	3260	27	2268	2	482
FEMALE	201	17192	158	13979	13	998	16	808	13	1161	3	246
JOINT (MALE/FEMALE)	573	83605	481	72160	23	4014	41	4124	26	3155	2	152
OTHERS, INCLUDING HISPANIC (TOTAL)	95	9317	34	3375			11	1308	10	614		
MALE	13	940	7	752			2	94	4	94		
FEMALE	7	951	4	270			2	273	1	8		
JOINT (MALE/FEMALE)	35	3826	23	2353			7	961	5	512		
INCOME OF APPLICANTS 9/												
LESS THAN 50% OF MSA/MD MEDIAN	153	9267	105	6747	1	60	31	1837	15	530	1	93
50-79% OF MSA/MD MEDIAN	297	24299	232	19342	14	864	28	2457	19	1327	4	309
80-99% OF MSA/MD MEDIAN	171	16961	130	13409	7	678	16	1331	18	1397	2	146
100-119% OF MSA/MD MEDIAN	111	13478	88	10854	7	669	8	1131	7	737	1	87
120% OR MORE OF MSA/MD MEDIAN	435	78456	358	69522	23	4592	28	3670	24	4115	2	567
INCOME NOT AVAILABLE 6/	100	9515	88	8429	1	68	8	808	2	157	1	53
TOTAL 14/	1267	151976	1001	124303	53	6931	119	11234	83	8263	11	1245

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AGGREGATE TABLE 4-3: DISPOSITION OF APPLICATIONS TO REFINANCE LOANS ON 1- TO 4-FAMILY AND MANUFACTURED HOME DWELLINGS, BY RACE, ETHNICITY, GENDER AND INCOME OF APPLICANT, 2011

MSA/MD: 36780 - OSHKOSH-NEENAH, WI

RACE AND GENDER 5/ 18/ 19/	Applications Received 20/		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 INDIAN/ALASKA NATIVE (TOTAL)	11	1941	5	745			3	266	1	103	2	827
MALE	8	1708	4	659			1	119	1	103	2	827
FEMALE	3	233	1	86			2	147				
JOINT (MALE/FEMALE)												
ASIAN (TOTAL)	51	7385	31	4949	3	205	8	1025	8	752	3	454
MALE	12	2006	6	1036			3	571	2	232	1	167
FEMALE	7	497	5	309			1	88	1	90		
JOINT (MALE/FEMALE)	32	4882	20	3604	3	205	4	356	3	430	2	287
BLACK OR AFRICAN AMERICAN (TOTAL)	8	875	3	308			3	317	2	250		
MALE	2	130	1	55					1	75		
FEMALE	5	570	2	253			3	317				
JOINT (MALE/FEMALE)	1	175							1	175		
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND (TOTAL)	3	364	1	121			2	243				
MALE	1	150					1	150				
FEMALE	1	93					1	93				
JOINT (MALE/FEMALE)	1	221	1	121								
WHITE (TOTAL)	5833	741369	3986	502514	254	31302	898	117033	538	70416	157	20524
MALE	1229	137393	746	81009	62	6552	242	30066	141	15513	38	3949
FEMALE	844	82981	509	48673	39	1344	165	17474	101	11470	30	2630
JOINT (MALE/FEMALE)	3746	518949	2724	372119	153	21486	487	69962	294	42662	88	13700
2 OR MORE MINORITY RACES (TOTAL)												
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
JOINT (WHITE/MINORITY RACE) (TOTAL)	51	6507	34	4365	3	338	9	1051	5	753		
MALE	1	50					1	50				
FEMALE	1	118							1	118		
JOINT (MALE/FEMALE)	49	6339	34	4365	3	338	8	1001	4	635		
RACE NOT AVAILABLE (TOTAL) 6/	381	68592	178	30254	18	1873	88	16107	73	16681	26	3677
MALE	44	6008	11	1888	2	203	15	1949	14	1528	2	440
FEMALE	24	2915	9	766			9	1064	5	894	1	191
JOINT (MALE/FEMALE)	68	10656	34	5310	3	360	12	2124	14	2063	5	799

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MSA/MD: 36780 - OSHKOSH-NEENAH, WI

ETHNICITY, GENDER AND INCOME 7/ 18/ 19/	Applications Received 20/		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
HISPANIC OR LATINO (TOTAL)	51	5263	24	2596	3	270	17	1672	7	725		
MALE	25	2368	15	1513	1	80	8	837	1	138		
FEMALE	6	738	2	208			2	339	2	191		
JOINT (MALE/FEMALE)	20	2157	7	1075	2	190	7	496	4	396		
NOT HISPANIC OR LATINO (TOTAL)	5827	743427	3999	505935	249	30636	889	115678	531	69470	159	21708
MALE	1223	138074	741	80869	61	6523	239	30012	140	15540	42	5130
FEMALE	855	84469	516	49169	38	3294	170	17802	102	11672	29	2532
JOINT (MALE/FEMALE)	378	518910	2738	375453	149	20609	475	67189	287	41958	87	13701
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO) (TOTAL)	43	5614	25	2775	5	687	9	1703	3	377	1	72
MALE	1	256					1	256				
FEMALE	42	5358	25	2775	5	687	8	1447	3	377	1	72
JOINT (MALE/FEMALE)	417	73329	188	31950	21	2205	96	16989	84	18383	28	3802
ETHNICITY NOT AVAILABLE (TOTAL) 6/	49	7003	12	2465	2	152	18	2055	18	2078	1	253
MALE	23	2854	8	710	1	90	8	798	4	709	2	289
FEMALE	99	14897	43	6216	6	903	21	3331	22	3234	7	1013
JOINT (MALE/FEMALE)												
MINORITY STATUS 8/ 18/ 19/												
WHITE NON-HISPANIC (TOTAL)	5882	723071	3913	493612	242	29965	859	111921	516	67427	152	20146
MALE	1193	133314	728	78853	60	6437	232	29022	135	15053	38	3949
FEMALE	831	82101	503	49068	38	3294	161	18838	100	11369	29	2532
JOINT (MALE/FEMALE)	3648	506208	2678	366247	144	20234	462	65549	280	40858	84	13320
OTHERS, INCLUDING HISPANIC (TOTAL)	215	27739	121	15739	14	1500	51	6777	23	2870	6	1353
MALE	40	6412	26	3363	1	80	14	1727	5	548	3	994
FEMALE	23	2415	10	856			10	1250	3	309		
JOINT (MALE/FEMALE)	143	18912	85	11820	13	1420	27	3300	15	2013	3	359
INCOME OF APPLICANTS 9/												
LESS THAN 50% OF MSA/MD MEDIAN	433	32119	219	14404	17	1216	146	12271	39	3287	12	941
50-79% OF MSA/MD MEDIAN	1103	96519	652	54119	57	4821	220	20959	139	13532	35	3088
80-99% OF MSA/MD MEDIAN	899	95774	555	55923	35	3845	173	20533	103	11412	33	4261
100-119% OF MSA/MD MEDIAN	698	77624	480	50689	46	4777	97	12566	56	6605	20	2987
120% OR MORE OF MSA/MD MEDIAN	2834	463461	2054	328007	109	17767	330	64103	249	42175	82	13409
INCOME NOT AVAILABLE 6/	371	62136	266	42114	14	1572	45	5610	40	11944	6	895
TOTAL 14/	6338	827633	4236	543256	278	33798	1011	136042	625	89955	188	25582

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RACE AND GENDER 5/ 18/ 19/	Applications Received 20/		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 INDIAN/ALASKA NATIVE (TOTAL)	2	32	1	2			1	30				
MALE	1	2	1	2								
FEMALE	1	30					1	30				
JOINT (MALE/FEMALE)												
ASIAN (TOTAL)	9	609	6	421	2	137	1	51				
MALE	3	267	2	133	1	134						
FEMALE												
JOINT (MALE/FEMALE)	6	342	4	288	1	3	1	51				
BLACK OR AFRICAN AMERICAN (TOTAL)	6	239	4	171			2	68				
MALE	2	90	1	25			1	65				
FEMALE	4	149	3	146			1	3				
JOINT (MALE/FEMALE)												
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND (TOTAL)												
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
WHITE (TOTAL)	545	29048	388	21715	21	1145	103	3802	29	1991	6	305
MALE	134	4822	79	3243	5	94	31	1185	5	39	4	261
FEMALE	111	4709	66	3008	6	418	34	1088	5	195		
JOINT (MALE/FEMALE)	310	19517	241	15464	10	633	38	1619	19	1757	2	44
2 OR MORE MINORITY RACES (TOTAL)												
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
JOINT (WHITE/MINORITY RACE) (TOTAL)	3	296	3	296								
MALE												
FEMALE												
JOINT (MALE/FEMALE)	3	296	3	296								
RACE NOT AVAILABLE (TOTAL) 6/	28	2592	19	2121	1	4	6	237	2	230		
MALE												
FEMALE												
JOINT (MALE/FEMALE)	3	346	2	226			1	120				

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ETHNICITY, GENDER AND INCOME 7/ 18/ 19/	Applications Received 20/		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
HISPANIC OR LATINO (TOTAL)	7	197	5	50			2	147				
MALE	5	179	3	32								
FEMALE							2	147				
JOINT (MALE/FEMALE)	2	18	2	18								
NOT HISPANIC OR LATINO (TOTAL)	548	29317	392	22219	23	1292	100	3671	27	1840	6	305
MALE	124	4902	80	3371	6	228	29	1003	5	39	4	261
FEMALE	114	4754	69	3154	6	418	35	1096	4	96		
JOINT (MALE/FEMALE)	310	19661	243	15694	11	636	36	1582	18	1705	2	44
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO) (TOTAL)	4	239	3	235			1	4				
MALE												
FEMALE												
JOINT (MALE/FEMALE)	4	239	3	235			1	4				
ETHNICITY NOT AVAILABLE (TOTAL) 6/	34	3063	19	2222	1	4	10	456	4	381		
MALE	1	100					1	100				
FEMALE	2	134					1	35	1	99		
JOINT (MALE/FEMALE)	6	583	2	327			3	204	1	52		
MINORITY STATUS 8/ 18/ 19/												
WHITE NON-HISPANIC (TOTAL)	528	28141	378	21329	21	1145	96	3522	27	1840	6	305
MALE	118	4543	76	3211	5	94	28	938	5	39	4	261
FEMALE	109	4575	68	3008	8	418	33	1053	4	96		
JOINT (MALE/FEMALE)	301	19023	236	15110	10	633	36	1531	18	1705	2	44
OTHERS, INCLUDING HISPANIC (TOTAL)	31	1612	22	1175	2	137	7	306				
MALE	11	538	7	192	1	134	3	212				
FEMALE	5	179	3	146			2	33				
JOINT (MALE/FEMALE)	15	895	12	837	1	3	2	55				
INCOME OF APPLICANTS 9/												
LESS THAN 50% OF MSA/MD MEDIAN	63	2414	28	1001	3	48	28	1110	3	185	1	70
50-79% OF MSA/MD MEDIAN	125	5951	88	4379	3	78	27	976	5	332	2	185
80-99% OF MSA/MD MEDIAN	86	3825	60	3253	5	46	14	320	6	198	1	5
100-119% OF MSA/MD MEDIAN	69	3130	49	2119	3	280	11	303	6	428		
120% OR MORE OF MSA/MD MEDIAN	238	15647	186	12485	9	596	30	1444	11	1078	2	44
INCOME NOT AVAILABLE 6/	12	1849	8	1489	1	235	3	125				
TOTAL 14/	593	32816	419	24726	24	1286	113	4278	31	2221	6	305

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RACE AND GENDER 5/ 18/ 19/	Applications Received 20/		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 INDIAN/ALASKA NATIVE (TOTAL)												
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
ASIAN (TOTAL)												
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
BLACK OR AFRICAN AMERICAN (TOTAL)												
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND (TOTAL)												
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
WHITE (TOTAL)	5	6269	4	6022							1	247
MALE	3	5344	2	4897							1	247
FEMALE												
JOINT (MALE/FEMALE)	2	1125	2	1125								
2 OR MORE MINORITY RACES (TOTAL)												
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
JOINT (WHITE/MINORITY RACE) (TOTAL)												
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
RACE NOT AVAILABLE (TOTAL) 6/	30	70990	23	31254	3	11111	2	3100	2	25435		
MALE												
FEMALE												
JOINT (MALE/FEMALE)												

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MSA/MD: 36780 - OSHKOSH-NEENAH, WI

ETHNICITY, GENDER AND INCOME 7/ 18/ 19/	Applications Received 20/		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
HISPANIC OR LATINO (TOTAL)												
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
NOT HISPANIC OR LATINO (TOTAL)	5	6269	4	6022							1	247
MALE	3	5144	2	4897							1	247
FEMALE												
JOINT (MALE/FEMALE)	2	1125	2	1125								
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO) (TOTAL)												
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
ETHNICITY NOT AVAILABLE (TOTAL) 6/	30	78990	23	31254	3	11111	2	3190	2	25435		
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
MINORITY STATUS 8/ 18/ 19/												
WHITE NON-HISPANIC (TOTAL)	5	6269	4	6022							1	247
MALE	3	5144	2	4897							1	247
FEMALE												
JOINT (MALE/FEMALE)	2	1125	2	1125								
OTHERS, INCLUDING HISPANIC (TOTAL)												
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
INCOME OF APPLICANTS 9/												
LESS THAN 50% OF MSA/MD MEDIAN												
50-79% OF MSA/MD MEDIAN												
80-99% OF MSA/MD MEDIAN												
100-119% OF MSA/MD MEDIAN												
120% OR MORE OF MSA/MD MEDIAN												
INCOME NOT AVAILABLE 6/	35	77259	27	37276	3	11111	2	3190	2	25435	1	247
TOTAL 14/	35	77259	27	37276	3	11111	2	3190	2	25435	1	247

Report Date: 06/04/2012

AGGREGATE TABLE 4-B: DISPOSITION OF APPLICATIONS FROM NONOCCUPANTS FOR HOME PURCHASE, HOME IMPROVEMENT, OR REFINANCING LOANS, 1- TO 4-FAMILY AND MANUFACTURED HOME DWELLINGS, BY RACE, ETHNICITY, GENDER AND INCOME OF APPLICANT, 2011

MSA/MD: 36780 - OSHKOSH-NEENAH, WI

RACE AND GENDER 5/ 18/ 19/	Applications Received 20/		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 INDIAN/ALASKA NATIVE (TOTAL)	1	30	1	30								
MALE	1	30	1	30								
FEMALE												
JOINT (MALE/FEMALE)												
ASIAN (TOTAL)	3	224	2	153			1	71				
MALE	2	142	1	71			1	71				
FEMALE												
JOINT (MALE/FEMALE)	1	82	1	82								
BLACK OR AFRICAN AMERICAN (TOTAL)												
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND (TOTAL)												
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
WHITE (TOTAL)	421	44607	282	20772	15	1390	86	10538	31	3189	7	518
MALE	135	10411	83	5971	6	355	22	2922	11	884	4	279
FEMALE	39	4188	20	2504	2	215	13	1144	3	267	1	38
JOINT (MALE/FEMALE)	256	30028	179	20297	7	820	51	6472	17	2238	2	201
2 OR MORE MINORITY RACES (TOTAL)												
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
JOINT (WHITE/MINORITY RACE) (TOTAL)	3	434	2	114					1	320		
MALE												
FEMALE												
JOINT (MALE/FEMALE)	3	434	2	114					1	320		
RACE NOT AVAILABLE (TOTAL) 6/	146	28756	120	19202	4	336	14	1523	6	7335	2	360
MALE	3	250	1	89	1	86			1	75		
FEMALE	2	133	1	93			1	40				
JOINT (MALE/FEMALE)	6	1133	1	69	1	112	3	722			1	230

Report Date: 06/04/2012

AGGREGATE TABLE 4-B: DISPOSITION OF APPLICATIONS FROM NONOCCUPANTS FOR HOME PURCHASE, HOME IMPROVEMENT, OR REFINANCING LOANS, 1- TO 4-FAMILY AND MANUFACTURED HOME DWELLINGS, BY RACE, ETHNICITY, GENDER AND INCOME OF APPLICANT, 2011

MSA/MD: 36780 - OSHKOSH-NEENAH, WI

ETHNICITY, GENDER AND INCOME (1/18/19)	Applications Received 201		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
HISPANIC OR LATINO (TOTAL)	7	533	3	235	1	91	2	115	1	92		
MALE	4	258	3	235			1	23				
FEMALE												
JOINT (MALE/FEMALE)	3	275			1	91	1	92	1	92		
NOT HISPANIC OR LATINO (TOTAL)	415	44177	280	28384	15	1385	83	10378	30	3512	7	518
MALE	126	10250	82	9676	7	441	22	2970	11	884	4	279
FEMALE	39	4168	20	2504	2	215	13	1144	3	267	1	38
JOINT (MALE/FEMALE)	250	29759	178	20204	6	729	48	6264	16	2361	2	201
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO) (TOTAL)	6	586	4	289			2	297				
MALE												
FEMALE												
JOINT (MALE/FEMALE)	6	586	4	289			2	297				
ETHNICITY NOT AVAILABLE (TOTAL) 6/	146	28755	120	19303	3	250	14	1342	7	7440	2	360
MALE	2	325	1	250					1	75		
FEMALE	2	133	1	93			1	40				
JOINT (MALE/FEMALE)	7	1057	1	89	1	112	3	541	1	105	1	230
MINORITY STATUS 8/ 18/ 19/												
WHITE NON-HISPANIC (TOTAL)	406	43120	275	28067	14	1299	81	10024	29	3192	7	518
MALE	122	9992	80	9575	6	305	21	2899	11	884	4	279
FEMALE	39	4168	20	2504	2	215	13	1144	3	267	1	38
JOINT (MALE/FEMALE)	245	28960	175	20088	6	729	47	5981	15	2041	2	201
OTHERS, INCLUDING HISPANIC (TOTAL)	20	1807	12	821	1	91	5	483	2	412		
MALE	7	430	5	336			2	94				
FEMALE												
JOINT (MALE/FEMALE)	13	1377	7	485	1	91	3	389	2	412		
INCOME OF APPLICANTS 9/												
LESS THAN 50% OF MSA/MD MEDIAN	18	1303	10	643			7	580	1	80		
50-79% OF MSA/MD MEDIAN	41	2677	24	1345	2	149	13	1075	1	35	1	73
80-99% OF MSA/MD MEDIAN	62	5131	36	2809	2	96	13	1276	10	862	1	68
100-119% OF MSA/MD MEDIAN	45	3927	30	2539	2	62	10	1161	2	127	1	38
120% OR MORE OF MSA/MD MEDIAN	274	34519	189	22280	11	1277	48	7463	21	2874	5	625
INCOME NOT AVAILABLE 6/	134	26494	118	18655	2	142	10	577	3	7046	1	74
TOTAL 14/	574	74051	407	48271	19	1736	101	12132	38	11044	9	878

Report Date: 06/04/2012



MSA/MD: 36780 - OSHKOSH-NEENAH, WI

RACE AND GENDER 5/ 18/ 19/	Applications Received 20/		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 INDIAN/ALASKA NATIVE (TOTAL)	3	48	1	8			1	32	1	8		
MALE												
FEMALE	1	8							1	8		
JOINT (MALE/FEMALE)	2	40	1	8			1	32				
ASIAN (TOTAL)	1	27	1	27								
MALE												
FEMALE												
JOINT (MALE/FEMALE)	1	27	1	27								
BLACK OR AFRICAN AMERICAN (TOTAL)	1	35							1	35		
MALE	1	35							1	35		
FEMALE												
JOINT (MALE/FEMALE)												
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND (TOTAL)												
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
WHITE (TOTAL)	58	1687	32	946	2	33	14	488	10	220		
MALE	10	362	6	101			1	5	3	56		
FEMALE	18	478	8	145	2	33	6	235	2	65		
JOINT (MALE/FEMALE)	30	1047	18	700			7	248	5	99		
2 OR MORE MINORITY RACES (TOTAL)												
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
JOINT (WHITE/MINORITY RACE) (TOTAL)												
MALE												
FEMALE												
JOINT (MALE/FEMALE)												
RACE NOT AVAILABLE (TOTAL) 6/	4	59	1	30			1	10	2	19		
MALE	1	3							1	3		
FEMALE												
JOINT (MALE/FEMALE)	2	46	1	30					1	16		

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AGGREGATE TABLE 4-7: DISPOSITION OF APPLICATIONS FOR HOME PURCHASE, HOME IMPROVEMENT, OR REFINANCING LOANS, MANUFACTURED HOME DWELLINGS, BY RACE, ETHNICITY, GENDER AND INCOME OF APPLICANT, 2011

MSA/MD: 36780 - OSHKOSH-NEENAH, WI

ETHNICITY, GENDER AND INCOME 7/ 18/ 19/	Applications Received 20/		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
HISPANIC OR LATINO (TOTAL)	5	89	2	36			1	28	2	16		
MALE	2	16							2	16		
FEMALE												
JOINT (MALE/FEMALE)	3	64	2	36			1	28				
NOT HISPANIC OR LATINO (TOTAL)	55	1656	31	947	2	33	13	457	9	219		
MALE	10	184	6	101			1	5	3	78		
FEMALE	17	443	8	145	2	33	5	200	2	65		
JOINT (MALE/FEMALE)	28	1029	17	701			7	252	4	76		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO) (TOTAL)	2	44	1	21					1	23		
MALE												
FEMALE												
JOINT (MALE/FEMALE)	2	44	1	21					1	23		
ETHNICITY NOT AVAILABLE (TOTAL) 6/	5	76	1	7			2	45	2	24		
MALE												
FEMALE	2	43					1	35	1	8		
JOINT (MALE/FEMALE)	2	23	1	7					1	16		
MINORITY STATUS 8/ 18/ 19/												
WHITE NON-HISPANIC (TOTAL)	51	1554	29	912	2	33	12	425	8	184		
MALE	9	149	6	101			1	5	2	43		
FEMALE	17	443	8	145	2	33	5	200	2	65		
JOINT (MALE/FEMALE)	25	962	15	666			6	220	4	76		
OTHERS, INCLUDING HISPANIC (TOTAL)	12	234	5	92			2	60	5	82		
MALE	3	51							3	51		
FEMALE	1	8							1	8		
JOINT (MALE/FEMALE)	8	175	5	92			2	60	1	23		
INCOME OF APPLICANTS 9/												
LESS THAN 50% OF MSA/MD MEDIAN	25	334	11	135			6	102	8	97		
50-79% OF MSA/MD MEDIAN	27	877	17	519	1	13	5	215	4	130		
80-99% OF MSA/MD MEDIAN	6	134	2	34	1	20	2	57	1	23		
100-119% OF MSA/MD MEDIAN	1	32							1	32		
120% OR MORE OF MSA/MD MEDIAN	7	364	5	323			2	41				
INCOME NOT AVAILABLE 6/	1	115					1	115				
TOTAL 14/	67	1856	35	1011	2	33	16	530	14	282		

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INCOME, RACE AND ETHNICITY	Applications Received 2011		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/ND MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE												
ASIAN												
BLACK OR AFRICAN AMERICAN												
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND												
WHITE	84	6190	52	3979	4	269	18	1274	7	497	3	141
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)												
RACE NOT AVAILABLE 6/	5	493					4	460	1	33		
ETHNICITY 7/												
HISPANIC OR LATINO	3	186	1	95			2	91				
NOT HISPANIC OR LATINO	81	5872	51	3884	4	269	15	1048	8	530	3	141
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)												
ETHNICITY NOT AVAILABLE 6/	5	585					5	595				
MINORITY STATUS 8/												
WHITE NON-HISPANIC	80	5839	51	3884	4	269	15	1048	7	497	3	141
OTHERS, INCLUDING HISPANIC	3	186	1	95			2	91				
50-75% OF MSA/ND MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE												
ASIAN	3	260	2	233					1	27		
BLACK OR AFRICAN AMERICAN												
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND												
WHITE	145	14492	109	11189	6	451	23	2302	7	550		
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)												
RACE NOT AVAILABLE 6/	4	348	2	178			1	73	1	97		
ETHNICITY 7/												
HISPANIC OR LATINO	3	298	2	225			1	73				
NOT HISPANIC OR LATINO	144	14197	109	11108	6	451	21	2061	8	577		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	3	395	1	114			2	241				
ETHNICITY NOT AVAILABLE 6/	2	250	1	153					1	97		
MINORITY STATUS 8/												
WHITE NON-HISPANIC	139	13759	106	10697	6	451	21	2061	7	550		
OTHERS, INCLUDING HISPANIC	9	913	5	572			3	314	1	27		

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INCOME, RACE AND ETHNICITY (CONTINUED)	Applications Received 2011		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
90-99% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE												
ASIAN	2	281	2	281								
BLACK OR AFRICAN AMERICAN												
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND												
WHITE	94	10730	69	7508	4	434	13	1413	8	975		
2 OR MORE MINORITY RACES												
JOINT (WHITE MINORITY RACE)	2	224	2	224								
RACE NOT AVAILABLE 6/	1	48					1	48				
ETHNICITY 7/												
HISPANIC OR LATINO												
NOT HISPANIC OR LATINO	96	10966	71	8134	4	434	13	1413	8	975		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	2	279	2	279								
ETHNICITY NOT AVAILABLE 6/	1	48					1	48				
MINORITY STATUS 8/												
WHITE NON-HISPANIC	92	10451	67	7529	4	434	13	1413	8	975		
OTHERS, INCLUDING HISPANIC	6	784	6	784								
100-119% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE												
ASIAN	2	312	1	156			1	156				
BLACK OR AFRICAN AMERICAN												
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND												
WHITE	48	6269	40	5566			7	591			1	112
2 OR MORE MINORITY RACES												
JOINT (WHITE MINORITY RACE)	2	244	2	244								
RACE NOT AVAILABLE 6/												
ETHNICITY 7/												
HISPANIC OR LATINO	2	224	1	112							1	112
NOT HISPANIC OR LATINO	49	6469	41	5722			8	747				
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)												
ETHNICITY NOT AVAILABLE 6/	1	132	1	132								
MINORITY STATUS 8/												
WHITE NON-HISPANIC	46	6045	39	5454			7	591				
OTHERS, INCLUDING HISPANIC	4	536	2	268			1	156			1	112

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INCOME, RACE AND ETHNICITY (CONTINUED)	Applications Received 201		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
120% OR MORE OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE												
ASIAN												
BLACK OR AFRICAN AMERICAN	1	140	1	140								
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND	1	154							1	154		
WHITE	94	15616	71	12122	5	899	11	1565	6	870	1	160
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)												
RACE NOT AVAILABLE 6/	1	88	1	88								
ETHNICITY 7/												
HISPANIC OR LATINO												
NOT HISPANIC OR LATINO	95	15790	71	12142	5	899	11	1565	7	1024	1	160
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)												
ETHNICITY NOT AVAILABLE 6/	1	88	1	88								
MINORITY STATUS 8/												
WHITE NON-HISPANIC												
OTHERS, INCLUDING HISPANIC	3	414	2	260	5	899	11	1565	6	870	1	160
TOTAL 14/	494	56411	357	42679	19	2053	81	8063	32	3203	5	413

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INCOME, RACE AND ETHNICITY	Applications Received 201		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/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	2	16	1	8					1	8		
ASIAN	4	338	2	185			1	110	1	43		
BLACK OR AFRICAN AMERICAN												
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND	1	42	1	42								
WHITE	138	8431	98	6225	1	60	27	1593	11	460	1	93
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)												
RACE NOT AVAILABLE 6/	8	440	3	287			3	134	2	19		
ETHNICITY 7/												
HISPANIC OR LATINO	5	124	2	57			1	51	2	16		
NOT HISPANIC OR LATINO	134	8303	96	6119	1	60	25	1541	11	490	1	93
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	2	149	2	149								
ETHNICITY NOT AVAILABLE 6/	12	661	5	422			5	245	2	24		
MINORITY STATUS 8/												
WHITE NON-HISPANIC	128	7915	92	5884	1	60	24	1431	10	447	1	93
OTHERS, INCLUDING HISPANIC	14	669	8	441			2	161	4	67		
50-75% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	2	120	1	88			1	32				
ASIAN	7	726	5	539			1	71	1	116		
BLACK OR AFRICAN AMERICAN	1	35							1	35		
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND												
WHITE	276	22629	220	18423	13	765	23	2036	16	1096	4	309
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	1	84	1	84								
RACE NOT AVAILABLE 6/	10	705	5	208	1	99	3	318	1	80		
ETHNICITY 7/												
HISPANIC OR LATINO	5	301	4	278			1	23				
NOT HISPANIC OR LATINO	279	22920	223	18822	12	665	23	1962	18	1247	3	224
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	1	64	1	64								
ETHNICITY NOT AVAILABLE 6/	12	1014	4	178	2	199	4	472	1	80	1	85
MINORITY STATUS 8/												
WHITE NON-HISPANIC	268	21955	216	18111	12	665	21	1859	18	1096	3	224
OTHERS, INCLUDING HISPANIC	17	1330	12	1063			3	126	2	151		

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INCOME, RACE AND ETHNICITY (CONTINUED)	Applications Received 2011		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
90-99% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE												
ASIAN	2	164	2	164								
BLACK OR AFRICAN AMERICAN												
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND												
WHITE	166	16485	126	13090	6	581	16	1331	16	1397	2	146
2 OR MORE MINORITY RACES												
JOINT (WHITE MINORITY RACE)												
RACE NOT AVAILABLE 6/	3	312	2	215	1	97						
ETHNICITY 7/												
HISPANIC OR LATINO	1	58	1	58								
NOT HISPANIC OR LATINO	165	16244	127	13136	7	678	15	1205	14	1079	2	146
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	1	23							1	23		
ETHNICITY NOT AVAILABLE 6/	4	636	2	215			1	126	1	295		
MINORITY STATUS 8/												
WHITE NON-HISPANIC	162	15983	125	12972	6	581	15	1205	14	1079	2	146
OTHERS, INCLUDING HISPANIC	4	245	3	222					1	23		
100-119% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	1	38	1	38								
ASIAN	2	333	1	178			1	155				
BLACK OR AFRICAN AMERICAN												
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND												
WHITE	103	12441	84	10457	6	579	5	581	7	737	1	87
2 OR MORE MINORITY RACES												
JOINT (WHITE MINORITY RACE)	1	220					1	220				
RACE NOT AVAILABLE 6/	4	446	2	381	1	90	1	175				
ETHNICITY 7/												
HISPANIC OR LATINO	1	96					1	96				
NOT HISPANIC OR LATINO	105	12797	86	10621	6	579	6	860	7	737		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	1	152	1	152								
ETHNICITY NOT AVAILABLE 6/	4	433	1	81	1	90	1	175			1	87
MINORITY STATUS 8/												
WHITE NON-HISPANIC	100	12106	83	10305	6	579	4	485	7	737		
OTHERS, INCLUDING HISPANIC	6	839	3	368			3	471				

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	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
120% OR MORE OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	3	584	3	584								
ASIAN	2	342	1	120			1	222				
BLACK OR AFRICAN AMERICAN												
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND												
WHITE	404	71974	334	60483	22	4189	26	3380	21	3495	1	417
2 OR MORE MINORITY RACES	2	316	1	192							1	124
JOINT (WHITE/MINORITY RACE)											2	496
RACE NOT AVAILABLE 6/	24	5240	19	4133	1	403	1	68			1	140
ETHNICITY 7/												
HISPANIC OR LATINO	1	177	1	177								
NOT HISPANIC OR LATINO	401	71776	335	60844	21	3919	25	3254	19	3342	1	417
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	6	815	2	218			2	348	2	249		
ETHNICITY NOT AVAILABLE 6/	27	5688	20	4283	2	673	1	68	3	524	1	140
MINORITY STATUS 8/												
WHITE NON-HISPANIC	394	70534	330	59048	21	3919	24	3032	18	3218	1	417
OTHERS, INCLUDING HISPANIC	14	2234	8	1291			3	570	3	373		
TOTAL 14/	1267	151976	1001	124303	53	6501	119	11234	83	8263	11	1245

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	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
LESS THAN 50% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	2	88	1	30			1	98				
ASIAN	6	412	4	269			1	85	1	58		
BLACK OR AFRICAN AMERICAN	1	125					1	125				
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND	1	93					1	93				
WHITE	393	28849	206	13574	17	1216	130	10778	32	2722	8	559
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)												
RACE NOT AVAILABLE 6/	30	2552	8	531			12	1132	6	507	4	382
ETHNICITY 7/												
HISPANIC OR LATINO	4	380	2	139			2	241				
NOT HISPANIC OR LATINO	396	29038	210	13808	15	1131	130	10760	33	2780	8	559
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)												
ETHNICITY NOT AVAILABLE 6/	33	2701	7	457	2	85	14	1270	6	507	4	382
MINORITY STATUS 8/												
WHITE NON-HISPANIC	385	28246	204	13435	15	1131	126	10399	32	2722	8	559
OTHERS, INCLUDING HISPANIC	14	1098	7	438			6	602	1	58		
50-75% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	2	222					1	119	1	103		
ASIAN	4	243	1	29	1	39	1	85	1	90		
BLACK OR AFRICAN AMERICAN	4	406	1	139			2	192	1	75		
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND												
WHITE	1027	89674	629	52316	51	4399	190	17998	125	12206	32	2755
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	7	665	3	196	1	145	3	324				
RACE NOT AVAILABLE 6/	99	5309	18	1439	4	238	23	2241	11	1058	3	333
ETHNICITY 7/												
HISPANIC OR LATINO	19	1785	7	645	2	179	8	750	2	191		
NOT HISPANIC OR LATINO	1017	88595	623	51739	52	4490	186	17563	125	12146	31	2657
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	2	145	2	145								
ETHNICITY NOT AVAILABLE 6/	65	6014	20	1590	3	152	26	2646	12	1195	4	431
MINORITY STATUS 8/												
WHITE NON-HISPANIC	997	88720	616	51175	49	4220	178	16700	123	11988	31	2657
OTHERS, INCLUDING HISPANIC	36	3281	13	1079	4	363	15	1470	4	369		

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INCOME, RACE AND ETHNICITY (CONTINUED)	Applications Received 2011		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
90-99% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	1	89					1	89				
ASIAN	10	1221	8	996			1	80			1	155
BLACK OR AFRICAN AMERICAN	1	55	1	55								
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND												
WHITE	838	88886	528	52964	34	3607	158	18954	91	10221	26	3150
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	7	590	6	540			1	50				
RACE NOT AVAILABLE 6/	42	4933	12	1388	1	38	11	1360	12	1191	6	956
ETHNICITY 7/												
HISPANIC OR LATINO	6	477	3	232			1	67	2	178		
NOT HISPANIC OR LATINO	842	89608	536	53966	33	3514	160	18989	85	9648	28	3491
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	6	700	2	189	1	93	2	285	1	133		
ETHNICITY NOT AVAILABLE 6/	45	4989	14	1536	1	38	10	1192	15	1453	5	770
MINORITY STATUS 8/												
WHITE NON-HISPANIC	820	87181	522	52457	33	3514	155	18507	85	9648	25	3055
OTHERS, INCLUDING HISPANIC	31	3132	20	2002	1	93	6	571	3	311	1	155
100-119% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	1	86	1	86								
ASIAN	4	471	3	415	1	56						
BLACK OR AFRICAN AMERICAN												
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND												
WHITE	657	73122	458	48351	44	4638	87	11266	48	5880	20	2987
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	6	785	4	556			1	111	1	118		
RACE NOT AVAILABLE 6/	30	3190	14	1281	1	83	9	1189	6	607		
ETHNICITY 7/												
HISPANIC OR LATINO	4	488	1	105			2	257	1	126		
NOT HISPANIC OR LATINO	655	72935	460	48790	43	4486	84	10800	48	5872	20	2987
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	7	859	4	423	2	208	1	228				
ETHNICITY NOT AVAILABLE 6/	32	3342	15	1371	1	83	10	1281	6	607		
MINORITY STATUS 8/												
WHITE NON-HISPANIC	643	71465	451	47605	42	4430	83	10689	47	5754	20	2987
OTHERS, INCLUDING HISPANIC	22	2689	13	1585	3	264	4	596	2	244		

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INCOME, RACE AND ETHNICITY (CONTINUED)	Applications Received 201		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
120% OR MORE OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	2	834	1	417							1	417
ASIAN	25	4808	14	3118	1	110	4	677	4	604	2	299
BLACK OR AFRICAN AMERICAN	1	175							1	175		
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND	2	271	1	121			1	150				
WHITE	2620	423390	1964	308211	94	15960	292	62929	213	36470	67	10830
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	28	4160	20	2991	2	193	4	566	2	410		
RACE NOT AVAILABLE 6/	196	29823	74	11149	12	1614	29	9781	29	9516	12	1863
ETHNICITY 7/												
HISPANIC OR LATINO	15	1853	9	1313	1	91	4	357	1	92		
NOT HISPANIC OR LATINO	2618	425011	1969	310791	92	15443	290	62496	210	36020	67	11261
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	26	3737	16	1914	2	386	5	1121	2	244	1	72
ETHNICITY NOT AVAILABLE 6/	175	32860	80	11989	14	1847	31	10129	36	6819	14	2076
MINORITY STATUS 8/												
WHITE NON-HISPANIC	2548	412595	1915	302742	89	15098	279	50654	201	33556	64	10545
OTHERS, INCLUDING HISPANIC	98	15763	60	9829	6	780	18	2871	10	1525	4	788
TOTAL 14/	6338	827633	4236	543296	278	33798	1011	126042	625	88965	188	25582

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INCOME, RACE AND ETHNICITY	Applications Received 2011		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/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE							1	51				
ASIAN	1	51					1	51				
BLACK OR AFRICAN AMERICAN	1	65					1	65				
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND												
WHITE	60	2235	27	938	3	48	26	994	3	185	1	70
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)												
RACE NOT AVAILABLE 6/	1	63	1	63								
ETHNICITY 7/												
HISPANIC OR LATINO	1	11					1	11				
NOT HISPANIC OR LATINO	98	2067	27	938	3	48	25	925	2	86	1	70
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)												
ETHNICITY NOT AVAILABLE 6/	4	336	1	63			2	174	1	99		
MINORITY STATUS 8/												
WHITE NON-HISPANIC	56	1951	27	938	3	48	23	809	2	86	1	70
OTHERS, INCLUDING HISPANIC	3	127					3	127				
50-75% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	1	30					1	30				
ASIAN	1	5	1	5								
BLACK OR AFRICAN AMERICAN	2	132	2	132								
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND												
WHITE	113	5343	81	3942	2	74	23	809	5	332	2	186
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	1	68	1	68								
RACE NOT AVAILABLE 6/	7	373	3	232	1	4	3	137				
ETHNICITY 7/												
HISPANIC OR LATINO	2	146	1	10			1	136				
NOT HISPANIC OR LATINO	113	5194	83	3938	2	74	21	664	5	332	2	186
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	2	203	1	199			1	4				
ETHNICITY NOT AVAILABLE 6/	8	408	3	232	1	4	4	172				
MINORITY STATUS 8/												
WHITE NON-HISPANIC	108	4959	79	3733	2	74	20	634	5	332	2	186
OTHERS, INCLUDING HISPANIC	9	584	6	414			3	170				

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INCOME, RACE AND ETHNICITY (CONTINUED)	Applications Received 201		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
90-99% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE												
ASIAN	1	3			1	3						
BLACK OR AFRICAN AMERICAN	1	3					1	3				
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND												
WHITE	79	3676	57	3195	4	46	12	292	5	178	1	5
2 OR MORE MINORITY RACES												
JOINT (WHITE MINORITY RACE)	1	20	1	20								
RACE NOT AVAILABLE 6/	4	123	2	78			1	25	1	20		
ETHNICITY 7/												
HISPANIC OR LATINO	1	7	1	7								
NOT HISPANIC OR LATINO	81	3695	57	3168	5	49	13	295	5	178	1	5
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)												
ETHNICITY NOT AVAILABLE 6/	4	123	2	78			1	25	1	20		
MINORITY STATUS 8/												
WHITE NON-HISPANIC	78	3669	56	3148	4	46	12	292	5	178	1	5
OTHERS, INCLUDING HISPANIC	4	33	2	27	1	3	1	3				
100-119% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE												
ASIAN												
BLACK OR AFRICAN AMERICAN												
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND												
WHITE	66	2907	47	2106	3	290	11	303	5	218		
2 OR MORE MINORITY RACES												
JOINT (WHITE MINORITY RACE)	3	223	2	13					1	210		
RACE NOT AVAILABLE 6/												
ETHNICITY 7/												
HISPANIC OR LATINO	1	4	1	4								
NOT HISPANIC OR LATINO	65	2903	46	2102	3	290	11	303	5	218		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)												
ETHNICITY NOT AVAILABLE 6/	3	223	2	13					1	210		
MINORITY STATUS 8/												
WHITE NON-HISPANIC	65	2903	46	2102	3	290	11	303	5	218		
OTHERS, INCLUDING HISPANIC	1	4	1	4								

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INCOME, RACE AND ETHNICITY (CONTINUED)	Applications Received 2011		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
120% OR MORE OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	1	2	1	2								
ASIAN	6	550	5	416	1	134						
BLACK OR AFRICAN AMERICAN	2	39	2	39								
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND												
WHITE	222	14422	171	11394	8	462	30	1444	11	1078	2	44
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	1	208	1	208								
RACE NOT AVAILABLE 6/	6	426	6	426								
ETHNICITY 7/												
HISPANIC OR LATINO	2	29	2	29								
NOT HISPANIC OR LATINO	226	14993	176	11893	9	596	29	1434	10	1026	2	44
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	2	36	2	36								
ETHNICITY NOT AVAILABLE 6/	8	589	6	527			1	10	1	52		
MINORITY STATUS 8/												
WHITE NON-HISPANIC	216	14194	167	11228	8	462	29	1434	10	1026	2	44
OTHERS, INCLUDING HISPANIC	14	864	13	730	1	134						
TOTAL 14/	593	32816	419	24726	24	1296	113	4278	31	2221	6	306

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MSA/MD: 36780 - OSHKOSH-NEENAH, WI

INCOME, RACE AND ETHNICITY	Applications Received 2011		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/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	1	30	1	30								
ASIAN												
BLACK OR AFRICAN AMERICAN												
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND												
WHITE	16	1204	8	544			7	580	1	80		
2 OR MORE MINORITY RACES												
JOINT (WHITE MINORITY RACE)												
RACE NOT AVAILABLE 6/	1	69	1	69								
ETHNICITY 7/												
HISPANIC OR LATINO												
NOT HISPANIC OR LATINO	17	1234	9	574			7	580	1	80		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)												
ETHNICITY NOT AVAILABLE 6/	1	69	1	69								
MINORITY STATUS 8/												
WHITE NON-HISPANIC	16	1204	8	544			7	580	1	80		
OTHERS, INCLUDING HISPANIC	1	30	1	30								
50-75% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE												
ASIAN	1	71					1	71				
BLACK OR AFRICAN AMERICAN												
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND												
WHITE	37	2458	23	1323	1	63	11	964	1	35	1	73
2 OR MORE MINORITY RACES												
JOINT (WHITE MINORITY RACE)												
RACE NOT AVAILABLE 6/	3	148	1	22	1	86	1	40				
ETHNICITY 7/												
HISPANIC OR LATINO	2	57	1	34			1	23				
NOT HISPANIC OR LATINO	37	2558	22	1289	2	149	11	1012	1	35	1	73
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)												
ETHNICITY NOT AVAILABLE 6/	2	62	1	22			1	40				
MINORITY STATUS 8/												
WHITE NON-HISPANIC	35	2401	22	1289	1	63	10	941	1	35	1	73
OTHERS, INCLUDING HISPANIC	3	128	1	34			2	94				

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MSA/MD: 36780 - OSHKOSH-NEENAH, WI

INCOME, RACE AND ETHNICITY (CONTINUED)	Applications Received 2011		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
90-99% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE												
ASIAN	1	71	1	71								
BLACK OR AFRICAN AMERICAN												
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND												
WHITE	59	4923	35	2738	2	96	12	1221	9	800	1	68
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)												
RACE NOT AVAILABLE 6/	2	137					1	55	1	82		
ETHNICITY 7/												
HISPANIC OR LATINO												
NOT HISPANIC OR LATINO	60	4994	36	2809	2	96	12	1221	9	800	1	68
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)												
ETHNICITY NOT AVAILABLE 6/	2	137					1	55	1	82		
MINORITY STATUS 8/												
WHITE NON-HISPANIC	59	4923	35	2738	2	96	12	1221	9	800	1	68
OTHERS, INCLUDING HISPANIC	1	71	1	71								
100-119% OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE												
ASIAN												
BLACK OR AFRICAN AMERICAN												
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND												
WHITE	42	3625	29	2487	2	62	9	986	1	52	1	38
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)												
RACE NOT AVAILABLE 6/	3	302	1	52			1	175	1	75		
ETHNICITY 7/												
HISPANIC OR LATINO												
NOT HISPANIC OR LATINO	40	3300	28	2390	2	62	8	758	1	52	1	38
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	2	325	1	87			1	228				
ETHNICITY NOT AVAILABLE 6/	3	302	1	52			1	175	1	75		
MINORITY STATUS 8/												
WHITE NON-HISPANIC	40	3300	28	2390	2	62	8	758	1	52	1	38
OTHERS, INCLUDING HISPANIC	2	325	1	87			1	228				

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INCOME, RACE AND ETHNICITY (CONTINUED)	Applications Received 201		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
120% OR MORE OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	1	82	1	82								
ASIAN												
BLACK OR AFRICAN AMERICAN												
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND												
WHITE	252	31048	178	20838	9	1095	43	6428	19	2422	3	265
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	3	434	2	114					1	320		
RACE NOT AVAILABLE 6/	18	2995	8	1246	2	182	5	1035	1	132	2	360
ETHNICITY 7/												
HISPANIC OR LATINO	4	364	1	89	1	91	1	92	1	92		
NOT HISPANIC OR LATINO	248	30923	177	20942	8	1004	42	6517	18	2545	3	265
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	3	192	3	192								
ETHNICITY NOT AVAILABLE 6/	19	3040	8	1407	2	182	5	854	2	237	2	360
MINORITY STATUS 8/												
WHITE NON-HISPANIC	243	30124	174	20396	8	1004	41	6234	17	2225	3	265
OTHERS, INCLUDING HISPANIC	11	1072	7	477	1	91	1	92	2	412		
TOTAL 14/	574	74051	407	48271	19	1726	101	12132	38	11044	9	878

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MSA/ND: 36780 - OSHKOSH-NEENAH, WI

INCOME, RACE AND ETHNICITY	Applications Received 201		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/ND MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	2	16	1	8					1	8		
ASIAN												
BLACK OR AFRICAN AMERICAN												
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND												
WHITE	20	289	10	127			5	92	5	70		
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)												
RACE NOT AVAILABLE 6/	3	29					1	10	2	19		
ETHNICITY 7/												
HISPANIC OR LATINO	3	22	1	6					2	16		
NOT HISPANIC OR LATINO	17	250	8	101			5	92	4	57		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	1	21	1	21								
ETHNICITY NOT AVAILABLE 6/	4	41	1	7			1	10	2	24		
MINORITY STATUS 8/												
WHITE NON-HISPANIC	16	242	7	93			5	92	4	57		
OTHERS, INCLUDING HISPANIC	6	59	3	35					3	24		
50-75% OF MSA/ND MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE	1	32					1	32				
ASIAN	1	27	1	27								
BLACK OR AFRICAN AMERICAN	1	35							1	35		
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND												
WHITE	23	753	15	462	1	13	4	183	3	95		
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)												
RACE NOT AVAILABLE 6/	1	30	1	30								
ETHNICITY 7/												
HISPANIC OR LATINO	1	30	1	30								
NOT HISPANIC OR LATINO	25	812	16	489	1	13	4	180	4	130		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)												
ETHNICITY NOT AVAILABLE 6/	1	35					1	35				
MINORITY STATUS 8/												
WHITE NON-HISPANIC	22	718	15	462	1	13	3	148	3	95		
OTHERS, INCLUDING HISPANIC	4	124	2	57			1	32	1	35		

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MSA/MD: 36780 - OSHKOSH-NEENAH, WI

INCOME, RACE AND ETHNICITY (CONTINUED)	Applications Received 201		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
<b>90-99% OF MSA/MD MEDIAN</b>												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE												
ASIAN												
BLACK OR AFRICAN AMERICAN												
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND												
WHITE												
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)												
RACE NOT AVAILABLE 6/												
ETHNICITY 7/												
HISPANIC OR LATINO												
NOT HISPANIC OR LATINO												
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)												
ETHNICITY NOT AVAILABLE 6/												
MINORITY STATUS 8/												
WHITE NON-HISPANIC												
OTHERS, INCLUDING HISPANIC												
<hr/>												
<b>100-119% OF MSA/MD MEDIAN</b>												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE												
ASIAN												
BLACK OR AFRICAN AMERICAN												
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND												
WHITE												
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)												
RACE NOT AVAILABLE 6/												
ETHNICITY 7/												
HISPANIC OR LATINO												
NOT HISPANIC OR LATINO												
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)												
ETHNICITY NOT AVAILABLE 6/												
MINORITY STATUS 8/												
WHITE NON-HISPANIC												
OTHERS, INCLUDING HISPANIC												

Report Date: 06/04/2012

MSA/MD: 36780 - OSHKOSH-NEENAH, WI

INCOME, RACE AND ETHNICITY (CONTINUED)	Applications Received 201		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
120% OR MORE OF MSA/MD MEDIAN												
RACE 5/												
AMERICAN INDIAN/ALASKA NATIVE												
ASIAN												
BLACK OR AFRICAN AMERICAN												
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND												
WHITE												
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)												
RACE NOT AVAILABLE 6/												
ETHNICITY 7/												
HISPANIC OR LATINO												
NOT HISPANIC OR LATINO												
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)												
ETHNICITY NOT AVAILABLE 6/												
MINORITY STATUS 8/												
WHITE NON-HISPANIC												
OTHERS, INCLUDING HISPANIC												
TOTAL 14/	67	1896	35	1011	2	33	16	530	14	282		

Report Date: 06/04/2012

AGGREGATE TABLE 7-1: DISPOSITION OF APPLICATIONS FOR FHA, FSA/RHS, AND VA HOME-PURCHASE LOANS, 1- TO 4-FAMILY AND MANUFACTURED HOME DWELLINGS, BY CHARACTERISTICS OF CENSUS TRACT IN WHICH PROPERTY IS LOCATED, 2011

MSA/MD: 36780 - OSHKOSH-MEENAH, WI

TYPE OF CENSUS TRACT 10/	Applications Received 20/		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
<b>RACIALETHNIC COMPOSITION 11/</b>												
LESS THAN 10% MINORITY	499	52544	332	40129	15	1419	76	7413	31	3170	5	413
10-19% MINORITY	26	2475	20	1846	1	105	4	491	1	33		
20-49% MINORITY	9	1392	5	704	3	529	1	159				
50-79% MINORITY												
80-100% MINORITY												
<b>INCOME CHARACTERISTICS 12/ 13/</b>												
LOW INCOME												
MODERATE INCOME	32	2542	18	1553			9	664	4	213	1	112
MIDDLE INCOME	359	38990	259	29333	17	1845	58	5603	22	2068	3	141
UPPER INCOME	103	14879	80	11793	2	208	14	1796	6	922	1	160
<b>INCOME &amp; RACIALETHNIC COMP 11/ 12/ 13/</b>												
LOW INCOME												
LESS THAN 10% MINORITY												
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
MODERATE INCOME												
LESS THAN 10% MINORITY	32	2542	18	1553			9	664	4	213	1	112
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
MIDDLE INCOME												
LESS THAN 10% MINORITY	324	35123	234	26783	13	1211	53	4953	21	2035	3	141
10-19% MINORITY	26	2475	20	1846	1	105	4	491	1	33		
20-49% MINORITY	9	1392	5	704	3	529	1	159				
50-79% MINORITY												
80-100% MINORITY												
UPPER INCOME												
LESS THAN 10% MINORITY	103	14879	80	11793	2	208	14	1796	6	922	1	160
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
<b>SMALL COUNTY</b>												
ALL OTHER TRACTS 21/												
TOTAL 14/	494	56411	357	42679	19	2053	81	8063	32	3203	5	413

Report Date: 06/04/2012

AGGREGATE TABLE 7-2: DISPOSITION OF APPLICATIONS FOR CONVENTIONAL HOME-PURCHASE LOANS, 1- TO 4-FAMILY AND MANUFACTURED HOME DWELLINGS, BY CHARACTERISTICS OF CENSUS TRACT IN WHICH PROPERTY IS LOCATED, 2011

MSA/MD: 36780 - OSHKOSH-MEENAH, WI

TYPE OF CENSUS TRACT 10/	Applications Received 20/		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
<b>RACIALETHNIC COMPOSITION 11/</b>												
LESS THAN 10% MINORITY	1156	142155	908	115337	52	6918	110	10639	76	8112	10	1149
10-19% MINORITY	82	7261	72	6649			6	431	3	85	1	96
20-49% MINORITY	29	2560	21	2317	1	13	3	164	4	66		
50-79% MINORITY												
80-100% MINORITY												
<b>INCOME CHARACTERISTICS 12/ 13/</b>												
LOW INCOME												
MODERATE INCOME	58	4031	42	2903	3	170	10	776	2	126	1	96
MIDDLE INCOME	859	95289	686	78274	34	3750	79	7344	55	5534	5	387
UPPER INCOME	290	52656	273	43126	16	3011	30	3114	26	2603	5	802
<b>INCOME &amp; RACIALETHNIC COMP 11/ 12/ 13/</b>												
<b>LOW INCOME</b>												
LESS THAN 10% MINORITY												
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
<b>MODERATE INCOME</b>												
LESS THAN 10% MINORITY	58	4031	42	2903	3	170	10	776	2	126	1	96
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
<b>MIDDLE INCOME</b>												
LESS THAN 10% MINORITY	748	85468	593	69308	33	3737	70	6749	48	5383	4	291
10-19% MINORITY	82	7261	72	6649			6	431	3	85	1	96
20-49% MINORITY	29	2560	21	2317	1	13	3	164	4	66		
50-79% MINORITY												
80-100% MINORITY												
<b>UPPER INCOME</b>												
LESS THAN 10% MINORITY	290	52656	273	43126	16	3011	30	3114	26	2603	5	802
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
<b>SMALL COUNTY</b>												
ALL OTHER TRACTS 21/												
TOTAL 14/	1267	151976	1001	124303	83	6931	119	11234	83	8263	11	1245

Report Date: 06/04/2012

AGGREGATE TABLE 7-3: DISPOSITION OF APPLICATIONS TO REFINANCE LOANS ON 1- TO 4-FAMILY AND MANUFACTURED HOME DWELLINGS, BY CHARACTERISTICS OF CENSUS TRACT IN WHICH PROPERTY IS LOCATED, 2011

MSA/MD: 36780 - OSHKOSH-MEENAH, WI

TYPE OF CENSUS TRACT 10/	Applications Received 20/		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
RACIALETHNIC COMPOSITION 11/												
LESS THAN 10% MINORITY	5653	765700	3831	503794	254	31416	819	123829	576	82288	173	24273
10-19% MINORITY	358	37956	219	24264	18	1457	72	7399	37	3798	12	1038
20-49% MINORITY	127	23977	86	15198	6	925	20	4714	12	2869	3	271
50-79% MINORITY												
80-100% MINORITY												
INCOME CHARACTERISTICS 12/ 13/												
LOW INCOME												
MODERATE INCOME	256	20328	139	10764	7	427	66	9616	33	2774	11	747
MIDDLE INCOME	4292	524992	2790	336758	195	21204	747	90503	427	59116	133	17411
UPPER INCOME	1790	282313	1307	195734	76	12167	190	39923	165	27065	44	7424
INCOME & RACIALETHNIC COMP 11/ 12/ 13/												
LOW INCOME												
LESS THAN 10% MINORITY												
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
MODERATE INCOME												
LESS THAN 10% MINORITY	256	20328	139	10764	7	427	66	9616	33	2774	11	747
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
MIDDLE INCOME												
LESS THAN 10% MINORITY	3807	463058	2485	297295	171	18822	655	78390	378	52449	118	16102
10-19% MINORITY	358	37956	219	24264	18	1457	72	7399	37	3798	12	1038
20-49% MINORITY	127	23977	86	15198	6	925	20	4714	12	2869	3	271
50-79% MINORITY												
80-100% MINORITY												
UPPER INCOME												
LESS THAN 10% MINORITY	1790	282313	1307	195734	76	12167	190	39923	165	27065	44	7424
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
SMALL COUNTY												
ALL OTHER TRACTS 21/												
TOTAL 14/	6338	827633	4236	543256	278	33798	1011	136042	625	88995	188	25582

Report Date: 06/04/2012

AGGREGATE TABLE 7-4: DISPOSITION OF APPLICATIONS FOR HOME IMPROVEMENT LOANS, 1- TO 4-FAMILY AND MANUFACTURED HOME DWELLINGS, BY CHARACTERISTICS OF CENSUS TRACT IN WHICH PROPERTY IS LOCATED, 2011

MSA/MD: 36780 - OSHKOSH-NEENAH, WI

TYPE OF CENSUS TRACT 10/	Applications Received 20/		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
RACIALETHNIC COMPOSITION 11/												
LESS THAN 10% MINORITY	548	30402	387	22860	21	1029	106	3639	30	2201	5	273
10-19% MINORITY	39	1778	28	1383	2	22	8	339			1	32
20-49% MINORITY	6	638	4	383	1	235			1	20		
50-79% MINORITY												
80-100% MINORITY												
INCOME CHARACTERISTICS 12/ 13/												
LOW INCOME												
MODERATE INCOME	30	865	16	370	1	100	10	314	2	8	1	73
MIDDLE INCOME	439	23639	304	17399	19	1050	90	3155	21	1803	5	232
UPPER INCOME	124	8312	99	6957	4	136	13	809	8	410		
INCOME & RACIALETHNIC COMP 11/ 12/ 13/												
LOW INCOME												
LESS THAN 10% MINORITY												
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
MODERATE INCOME												
LESS THAN 10% MINORITY	30	865	16	370	1	100	10	314	2	8	1	73
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
MIDDLE INCOME												
LESS THAN 10% MINORITY	394	21225	272	15633	16	783	82	2816	20	1783	4	200
10-19% MINORITY	39	1778	28	1383	2	22	8	339			1	32
20-49% MINORITY	6	638	4	383	1	235			1	20		
50-79% MINORITY												
80-100% MINORITY												
UPPER INCOME												
LESS THAN 10% MINORITY	124	8312	99	6957	4	136	13	809	8	410		
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
SMALL COUNTY												
ALL OTHER TRACTS 21/												
TOTAL 14/	593	32816	419	24726	24	1286	113	4278	31	2221	6	305

Report Date: 06/04/2012



AGGREGATE TABLE 7-5: DISPOSITION OF APPLICATIONS FOR LOANS ON DWELLINGS FOR 5 OR MORE FAMILIES, BY CHARACTERISTICS OF CENSUS TRACT IN WHICH PROPERTY IS LOCATED, 2011

MSA/MD: 36780 - OSHKOSH-NEENAH, WI

TYPE OF CENSUS TRACT 10/	Applications Received 20/		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
<b>RACIALETHNIC COMPOSITION 11/</b>												
LESS THAN 10% MINORITY	24	70048	18	32201	3	11111	1	1490	1	25000	1	247
10-19% MINORITY	11	7210	9	5075			1	1700	1	435		
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
<b>INCOME CHARACTERISTICS 12/ 13/</b>												
LOW INCOME												
MODERATE INCOME	1	200	1	200								
MIDDLE INCOME	31	42970	24	27967	3	11111	2	3190	1	435	1	247
UPPER INCOME	3	34089	2	9089								
<b>INCOME &amp; RACIALETHNIC COMP 11/ 12/ 13/</b>												
<b>LOW INCOME</b>												
LESS THAN 10% MINORITY												
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
<b>MODERATE INCOME</b>												
LESS THAN 10% MINORITY	1	200	1	200								
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
<b>MIDDLE INCOME</b>												
LESS THAN 10% MINORITY	20	35760	15	22912	3	11111	1	1490			1	247
10-19% MINORITY	11	7210	9	5075			1	1700	1	435		
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
<b>UPPER INCOME</b>												
LESS THAN 10% MINORITY	3	34089	2	9089						1	25000	
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
<b>SMALL COUNTY</b>												
ALL OTHER TRACTS 21/												
TOTAL 14/	35	77259	27	37276	3	11111	2	3190	2	25435	1	247

Report Date: 06/04/2012

AGGREGATE TABLE 7-6. DISPOSITION OF APPLICATIONS FROM NONOCCUPANTS FOR HOME-PURCHASE, HOME IMPROVEMENT, OR REFINANCING LOANS, 1- TO 4-FAMILY AND MANUFACTURED HOME DWELLINGS, BY CHARACTERISTICS OF CENSUS TRACT IN WHICH PROPERTY IS LOCATED, 2011

MSA/MD: 36780 - OSHKOSH-NEENAH, WI

TYPE OF CENSUS TRACT 10/	Applications Received 20/		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
RACIALETHNIC COMPOSITION 11/												
LESS THAN 10% MINORITY	508	67785	355	43418	16	1603	91	10924	37	10962	9	878
10-19% MINORITY	59	4468	47	3486	2	96	9	804	1	82		
20-49% MINORITY	7	1798	5	1367	1	27	1	404				
50-79% MINORITY												
80-100% MINORITY												
INCOME CHARACTERISTICS 12/ 13/												
LOW INCOME												
MODERATE INCOME	56	4077	36	2516	1	48	12	1054	4	254	3	205
MIDDLE INCOME	449	58006	327	37396	16	1474	69	8041	31	10422	6	673
UPPER INCOME	69	11968	44	8359	2	204	20	3037	3	368		
INCOME & RACIALETHNIC COMP 11/ 12/ 13/												
LOW INCOME												
LESS THAN 10% MINORITY												
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
MODERATE INCOME												
LESS THAN 10% MINORITY	56	4077	36	2516	1	48	12	1054	4	254	3	205
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
MIDDLE INCOME												
LESS THAN 10% MINORITY	383	51740	275	32543	13	1351	59	6833	30	10340	6	673
10-19% MINORITY	59	4468	47	3486	2	96	9	804	1	82		
20-49% MINORITY	7	1798	5	1367	1	27	1	404				
50-79% MINORITY												
80-100% MINORITY												
UPPER INCOME												
LESS THAN 10% MINORITY	69	11968	44	8359	2	204	20	3037	3	368		
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
SMALL COUNTY												
ALL OTHER TRACTS 21/												
TOTAL 14/	574	74051	407	48271	19	1726	101	12132	38	11044	9	878

Report Date: 06/04/2012

AGGREGATE TABLE 7-7: DISPOSITION OF APPLICATIONS FOR HOME-PURCHASE, HOME IMPROVEMENT, OR REFINANCING LOANS, MANUFACTURED HOME DWELLINGS, BY CHARACTERISTICS OF CENSUS TRACT IN WHICH PROPERTY IS LOCATED, 2011

MSA/MD: 36780 - OSHKOSH-MEENAH, WI

TYPE OF CENSUS TRACT 10/	Applications Received 20/		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
RACIALETHNIC COMPOSITION 11/												
LESS THAN 10% MINORITY	45	1392	23	775	1	20	12	363	9	214		
10-19% MINORITY	7	161	3	28			2	107	2	26		
20-49% MINORITY	15	303	9	208	1	13	2	40	3	42		
50-79% MINORITY												
80-100% MINORITY												
INCOME CHARACTERISTICS 12/ 13/												
LOW INCOME												
MODERATE INCOME												
MIDDLE INCOME	41	1094	25	772	2	33	7	175	7	114		
UPPER INCOME	26	762	10	239			9	355	7	168		
INCOME & RACIALETHNIC COMP 11/ 12/ 13/												
LOW INCOME												
LESS THAN 10% MINORITY												
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
MODERATE INCOME												
LESS THAN 10% MINORITY												
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
MIDDLE INCOME												
LESS THAN 10% MINORITY	19	630	13	536	1	20	3	28	2	46		
10-19% MINORITY	7	161	3	28			2	107	2	26		
20-49% MINORITY	15	303	9	208	1	13	2	40	3	42		
50-79% MINORITY												
80-100% MINORITY												
UPPER INCOME												
LESS THAN 10% MINORITY	26	762	10	239			9	355	7	168		
10-19% MINORITY												
20-49% MINORITY												
50-79% MINORITY												
80-100% MINORITY												
SMALL COUNTY												
ALL OTHER TRACTS 21/												
TOTAL 14/	67	1856	35	1011	2	33	16	530	14	282		

Report Date: 06/04/2012

MSA/MD: 36780 - OSHKOSH-NEENAH, WI

APPLICANT CHARACTERISTICS	Debt-to-Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit App. Incomplete		Mortgage Insurance Denied		Other		Total /22			
	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%		
<b>RACE 5/</b>																						
AMERICAN INDIAN/ALASKA NATIVE																						
ASIAN													1	100					1	100		
BLACK OR AFRICAN AMERICAN																						
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND																						
WHITE	19	21	14	15	23	25	16	17	5	5	4	4	8	9			3	3	62	100		
2 OR MORE MINORITY RACES																						
JOINT (WHITE/MINORITY RACE)																						
RACE NOT AVAILABLE 6/			1	20	4	80														5	100	
<b>ETHNICITY 7/</b>																						
HISPANIC OR LATINO																						
HISPANIC OR LATINO	1	25	1	25	2	50														4	100	
NOT HISPANIC OR LATINO	17	20	13	15	20	23	15	17	5	6	4	5	9	10			3	3	86	100		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	1	33	1	33			1	33												3	100	
ETHNICITY NOT AVAILABLE 6/					5	100															5	100
<b>MINORITY STATUS 8/</b>																						
WHITE NON-HISPANIC																						
WHITE NON-HISPANIC	17	20	13	15	20	24	15	18	5	6	4	5	8	9			3	4	85	100		
OTHERS, INCL. HISPANIC	2	25	2	25	2	25	1	13					1	13						8	100	
<b>GENDER 19/</b>																						
MALE																						
MALE	6	14	9	21	11	26	8	19	3	7	1	2	2	5			2	5	42	100		
FEMALE	7	23	4	13	9	29	5	16	1	3	2	6	2	6			1	3	31	100		
JOINT (MALE/FEMALE)	6	25	2	8	6	25	3	13	1	4	1	4	5	21						24	100	
GENDER NOT AVAILABLE 6/					1	100															1	100
<b>INCOME 9/</b>																						
LESS THAN 50% OF MSA/MD MEDIAN																						
LESS THAN 50% OF MSA/MD MEDIAN	6	19	5	16	13	42	2	6	1	3	2	6	1	3			1	3	31	100		
50-79% OF MSA/MD MEDIAN	5	17	7	23	5	17	11	37	1	3			1	3						30	100	
80-99% OF MSA/MD MEDIAN	1	7	2	14	5	36	1	7	1	7	1	7	3	21						14	100	
100-119% OF MSA/MD MEDIAN	2	25			1	13	1	13			1	13	3	38						8	100	
120% OR MORE OF MSA/MD MEDIAN	3	25			3	25	1	8	2	17			1	8			2	17	12	100		
INCOME NOT AVAILABLE 6/	2	67	1	33																3	100	

Report Date: 06/04/2012

MSA/MD: 36780 - OSHKOSH-NEENAH, WI

APPLICANT CHARACTERISTICS	Debt-to-Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit App. Incomplete		Mortgage Insurance Denied		Other		Total /22			
	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%		
RACE 5/																						
AMERICAN INDIAN/ALASKA NATIVE					1	100														1	100	
ASIAN					2	67							1	33						3	100	
BLACK OR AFRICAN AMERICAN					1	50			1	50										2	100	
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND																						
WHITE	22	20	2	2	37	34	12	11	12	11	3	3	7	6	1	1	13	12	100	100		
2 OR MORE MINORITY RACES																						
JOINT (WHITE/MINORITY RACE)																						
RACE NOT AVAILABLE 6/	7	44			4	25	1	6									4	25		16	100	
ETHNICITY 7/																						
HISPANIC OR LATINO							2	50	1	25	1	25								4	100	
NOT HISPANIC OR LATINO	22	22	2	2	37	36	10	10	11	11	2	2	7	7			11	11	102	100		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)					1	100														1	100	
ETHNICITY NOT AVAILABLE 6/	7	29			7	29	1	4	1	4			1	4	1	4	6	25		24	100	
MINORITY STATUS 8/																						
WHITE NON-HISPANIC	22	23	2	2	33	34	10	10	10	10	2	2	6	6			11	11		96	100	
OTHERS, INCL. HISPANIC					5	45	2	18	2	18	1	9	1	9						11	100	
GENDER 19/																						
MALE	8	17	1	2	12	26	8	17	8	17			3	7	1	2	5	11		46	100	
FEMALE	4	18			10	45	1	5	2	9	1	5	2	9					2	9	22	100
JOINT (MALE/FEMALE)	10	20	1	2	20	41	3	6	3	6	2	4	3	6			7	14		49	100	
GENDER NOT AVAILABLE 6/	7	50			3	21	1	7									3	21		14	100	
INCOME 9/																						
LESS THAN 50% OF MSA/MD MEDIAN	10	24			16	38	2	5	3	7	1	2	3	7			7	17		42	100	
50-79% OF MSA/MD MEDIAN	4	14	1	3	11	38	5	17	3	10			2	7	1	3	2	7		29	100	
80-99% OF MSA/MD MEDIAN	5	38			7	54	1	8												13	100	
100-119% OF MSA/MD MEDIAN	2	20			3	30	2	20	1	10			1	10			1	10		10	100	
120% OR MORE OF MSA/MD MEDIAN	4	14	1	3	8	28	3	10	5	17	2	7	2	7			4	14		29	100	
INCOME NOT AVAILABLE 6/	4	50							1	13							3	38		8	100	

Report Date: 06/04/2012

MSA/MD: 36780 - OSHKOSH-NEENAH, WI

APPLICANT CHARACTERISTICS	Debt-to-Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit App. Incomplete		Mortgage Insurance Denied		Other		Total /22		
	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	
<b>RACE 5/</b>																					
AMERICAN INDIAN/ALASKA NATIVE	1	33					1	33					1	33						3	100
ASIAN					2	29	3	43									2	29		7	100
BLACK OR AFRICAN AMERICAN	1	33			1	33	1	33												3	100
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND							1	33			1	33	1	33						3	100
WHITE	185	19	14	1	210	22	260	27	22	2	33	3	107	11	2	0	136	14		969	100
<b>2 OR MORE MINORITY RACES</b>																					
JOINT (WHITE/MINORITY RACE)	1	10			4	40	3	30							1	10	1	10		10	100
RACE NOT AVAILABLE 6/	15	19	2	3	23	29	13	16	1	1	3	4	9	11	1	1	13	16		80	100
<b>ETHNICITY 7/</b>																					
HISPANIC OR LATINO	4	24			4	24	3	18			1	6	2	12			3	18		17	100
NOT HISPANIC OR LATINO	182	19	13	1	207	22	256	27	22	2	33	3	107	11	3	0	131	14		954	100
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)					3	30	5	50									2	20		10	100
ETHNICITY NOT AVAILABLE 6/	17	18	3	3	26	28	18	19	1	1	3	3	9	10	1	1	16	17		94	100
<b>MINORITY STATUS 8/</b>																					
WHITE NON-HISPANIC	177	19	13	1	199	22	246	27	22	2	32	3	105	11	2	0	128	14		924	100
OTHERS, INCL. HISPANIC	7	13			14	26	17	32			2	4	4	8	1	2	8	15		53	100
<b>GENDER 19/</b>																					
MALE	40	15	3	1	65	24	75	28	8	3	14	5	25	9			37	14		267	100
FEMALE	43	22	1	1	47	24	43	22	4	2	5	3	21	11	1	1	28	15		193	100
JOINT (MALE/FEMALE)	111	20	10	2	107	19	153	28	10	2	18	3	64	12	3	1	80	14		956	100
GENDER NOT AVAILABLE 6/	9	15	2	3	21	36	11	19	1	2			8	14			7	12		59	100
<b>INCOME 9/</b>																					
LESS THAN 50% OF MSA/MD MEDIAN	50	30	4	2	39	23	28	17	2	1	6	4	12	7			26	16		167	100
50-79% OF MSA/MD MEDIAN	50	22	2	1	57	25	53	23	6	3	9	4	27	12			25	11		229	100
80-99% OF MSA/MD MEDIAN	31	17	2	1	42	23	51	28	3	2	6	3	22	12	2	1	21	12		180	100
100-119% OF MSA/MD MEDIAN	17	15	1	1	29	26	29	26	3	3	5	4	9	8	1	1	19	17		113	100
120% OR MORE OF MSA/MD MEDIAN	49	14	5	1	62	18	114	33	8	2	10	3	40	12	1	0	53	15		342	100
INCOME NOT AVAILABLE 6/	6	14	2	5	11	25	7	16	1	2	1	2	8	18			8	18		44	100

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AGGREGATE TABLE 8-4: REASONS FOR DENIAL OF APPLICATIONS FOR HOME IMPROVEMENT LOANS, 1- TO 4-FAMILY AND MANUFACTURED HOME DWELLINGS, BY RACE, ETHNICITY, GENDER AND INCOME OF APPLICANT, 2011

MSA/MD: 36780 - OSHKOSH-NEENAH, WI

APPLICANT CHARACTERISTICS	Debt-to-Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit App. Incomplete		Mortgage Insurance Denied		Other		Total /22		
	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	
<b>RACE 5/</b>																					
AMERICAN INDIAN/ALASKA NATIVE					1	50		1	50											2	100
ASIAN					1	50												1	50	2	100
BLACK OR AFRICAN AMERICAN	1	50			1	50														2	100
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND																					
WHITE	24	19	1	1	54	43	28	22	1	1	2	2					16	13	126	100	
2 OR MORE MINORITY RACES																					
JOINT (WHITE/MINORITY RACE)																					
RACE NOT AVAILABLE 6/	2	22			4	44							1	11			2	22	8	100	
<b>ETHNICITY 7/</b>																					
HISPANIC OR LATINO	2	67			1	33														3	100
NOT HISPANIC OR LATINO	22	18	1	1	52	42	29	23	1	1	2	2					17	14	124	100	
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)					1	100														1	100
ETHNICITY NOT AVAILABLE 6/	3	23			7	54							1	8			2	15	13	100	
<b>MINORITY STATUS 8/</b>																					
WHITE NON-HISPANIC	21	18	1	1	49	42	28	24	1	1	2	2					16	14	118	100	
OTHERS, INCL. HISPANIC	3	30			5	50	1	10									1	10	10	100	
<b>GENDER 19/</b>																					
MALE	11	27			14	34	10	24			2	5					4	10	41	100	
FEMALE	9	21			22	51	7	16									5	12	43	100	
JOINT (MALE/FEMALE)	5	10	1	2	22	45	12	24	1	2							8	16	49	100	
GENDER NOT AVAILABLE 6/	2	25			3	38							1	13			2	25	8	100	
<b>INCOME 9/</b>																					
LESS THAN 50% OF MSA/MD MEDIAN	7	25			13	46	4	14			1	4					3	11	28	100	
50-79% OF MSA/MD MEDIAN	7	22			18	56	4	13									3	9	32	100	
80-99% OF MSA/MD MEDIAN	5	20			9	36	5	20	1	4	1	4					4	16	25	100	
100-119% OF MSA/MD MEDIAN	1	8			5	42	4	33									2	17	12	100	
120% OR MORE OF MSA/MD MEDIAN	6	16	1	3	15	39	11	29									5	13	38	100	
INCOME NOT AVAILABLE 6/	1	17			1	17	1	17					1	17			2	33	6	100	

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APPLICANT CHARACTERISTICS	Debt-to-Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit App. Incomplete		Mortgage Insurance Denied		Other		Total (22)	
	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%
RACE 5/																				
AMERICAN INDIAN/ALASKA NATIVE																				
ASIAN																				
BLACK OR AFRICAN AMERICAN																				
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND																				
WHITE																				
2 OR MORE MINORITY RACES																				
JOINT (WHITE/MINORITY RACE)																				
RACE NOT AVAILABLE 6/																				
							1	50								1	50		2	100
ETHNICITY 7/																				
HISPANIC OR LATINO																				
NOT HISPANIC OR LATINO																				
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)																				
ETHNICITY NOT AVAILABLE 6/																				
							1	50								1	50		2	100
MINORITY STATUS 8/																				
WHITE NON-HISPANIC																				
OTHERS, INCL. HISPANIC																				
GENDER 19/																				
MALE																				
FEMALE																				
JOINT (MALE/FEMALE)																				
GENDER NOT AVAILABLE 6/																				
							1	50								1	50		2	100
INCOME 9/																				
LESS THAN 50% OF MSA/MD MEDIAN																				
50-79% OF MSA/MD MEDIAN																				
80-99% OF MSA/MD MEDIAN																				
100-119% OF MSA/MD MEDIAN																				
120% OR MORE OF MSA/MD MEDIAN																				
INCOME NOT AVAILABLE 6/																				
							1	50								1	50		2	100

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APPLICANT CHARACTERISTICS	Debt-to-Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit App. Incomplete		Mortgage Insurance Denied		Other		Total /22							
	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%						
RACE 5/																										
AMERICAN INDIAN/ALASKA NATIVE																										
ASIAN																										
													1	100			1	100								
BLACK OR AFRICAN AMERICAN																										
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND																										
WHITE																										
2 OR MORE MINORITY RACES																										
JOINT (WHITE/MINORITY RACE)																										
RACE NOT AVAILABLE 6/																										
ETHNICITY 7/																										
HISPANIC OR LATINO																										
NOT HISPANIC OR LATINO																										
													1	100			1	100								
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)																										
													2	100			2	100								
ETHNICITY NOT AVAILABLE 6/																										
MINORITY STATUS 8/																										
WHITE NON-HISPANIC																										
													11	12	22	24	7	8	4	4	10	11	14	15	92	100
OTHERS, INCL. HISPANIC																										
													3	75			1	25			4	100				
GENDER 19/																										
MALE																										
													1	4	12	48	3	12	1	4	1	4	3	12	25	100
FEMALE																										
													5	38	2	15					1	8	13	100		
JOINT (MALE/FEMALE)																										
													6	9	12	18	4	6	3	5	10	15	12	18	65	100
GENDER NOT AVAILABLE 6/																										
													2	18			2	18			2	18	11	100		
INCOME 9/																										
LESS THAN 50% OF MSA/MD MEDIAN																										
													2	29	1	14					1	14	7	100		
50-79% OF MSA/MD MEDIAN																										
													2	15	2	15	1	8	1	8	2	15	1	8	13	100
80-99% OF MSA/MD MEDIAN																										
													1	7	3	20	1	7			3	20	1	7	15	100
100-119% OF MSA/MD MEDIAN																										
													1	6	4	25	1	6			1	6	6	38	16	100
120% OR MORE OF MSA/MD MEDIAN																										
													6	11	16	30	4	8	3	6	6	11	7	13	53	100
INCOME NOT AVAILABLE 6/																										
													2	20			1	10			2	20	10	100		

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APPLICANT CHARACTERISTICS	Debt-to-Income Ratio		Employment History		Credit History		Collateral		Insufficient Cash		Unverifiable Information		Credit App. Incomplete		Mortgage Insurance Denied		Other		Total /22			
	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%		
<b>RACE 5/</b>																						
AMERICAN INDIAN/ALASKA NATIVE					1	100														1	100	
ASIAN																						
BLACK OR AFRICAN AMERICAN																						
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND																						
WHITE	2	13			11	73							1	7			1	7		15	100	
2 OR MORE MINORITY RACES																						
JOINT (WHITE/MINORITY RACE)																						
RACE NOT AVAILABLE 6/					1	100															1	100
<b>ETHNICITY 7/</b>																						
HISPANIC OR LATINO																						
NOT HISPANIC OR LATINO	2	13			11	73							1	7			1	7		15	100	
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)																						
ETHNICITY NOT AVAILABLE 6/					2	100															2	100
<b>MINORITY STATUS 8/</b>																						
WHITE NON-HISPANIC	2	14			10	71							1	7			1	7		14	100	
OTHERS, INCL. HISPANIC					1	100															1	100
<b>GENDER 19/</b>																						
MALE	1	50			1	50															2	100
FEMALE	1	14			4	57							1	14			1	14		7	100	
JOINT (MALE/FEMALE)					7	100															7	100
GENDER NOT AVAILABLE 6/					1	100															1	100
<b>INCOME 9/</b>																						
LESS THAN 50% OF MSA/MD MEDIAN	2	25			5	63											1	13		8	100	
50-79% OF MSA/MD MEDIAN					4	80							1	20						5	100	
80-99% OF MSA/MD MEDIAN					2	100														2	100	
100-119% OF MSA/MD MEDIAN																						
120% OR MORE OF MSA/MD MEDIAN					1	100															1	100
INCOME NOT AVAILABLE 6/					1	100															1	100

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CENSUS TRACTS BY MEDIAN AGE OF HOMES 23Y	Loans on 1- to 4-Family and Manufactured Home Dwellings													
	Home Purchase Loans				Refinancings		Home Improvement Loans		Loans on Dwellings For 5 or More Families		Nonoccupant Loans From Columns A, B, C & D		Loans On Manufactured Home Dwellings From Columns A, B, C & D	
	FHA, FSARHS & VA		Conventional		C		D		E		F		G	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
1990-MARCH 2000														
LOANS ORIGINATED														
APPLICATION APPROVED, NOT ACCEPTED														
APPLICATIONS DENIED														
APPLICATIONS WITHDRAWN														
FILES CLOSED FOR INCOMPLETENESS														
1980-1989	61	8605	215	30955	946	131141	69	4623	2	9089	38	7656	13	267
APPLICATION APPROVED, NOT ACCEPTED	2	208	11	2121	59	8641	1	110			1	112		
APPLICATIONS DENIED	11	1487	25	2347	145	23754	10	877			16	2387	9	256
APPLICATIONS WITHDRAWN	3	466	16	1061	111	16897	4	296	1	25000	2	338	9	194
FILES CLOSED FOR INCOMPLETENESS	1	160	3	597	34	4733								
1970-1979	100	12715	261	37280	1262	174725	127	7488	15	12419	66	8662	9	200
APPLICATION APPROVED, NOT ACCEPTED	5	745	7	940	78	9532	8	288	1	5660	3	160	1	13
APPLICATIONS DENIED	15	1905	32	3824	307	42635	37	1342	2	3190	26	3518	4	246
APPLICATIONS WITHDRAWN	4	499	23	2843	154	22350	8	287	1	435	8	612	5	88
FILES CLOSED FOR INCOMPLETENESS	1	112			54	8315	2	17			1	230		
1960-1969	75	10346	197	30777	1063	153027	86	6616	6	9972	104	16368	3	268
APPLICATION APPROVED, NOT ACCEPTED	4	458	16	2548	67	10263	7	524	1	5000	7	956		
APPLICATIONS DENIED	19	2523	25	2857	243	40005	20	485			20	2389	1	10
APPLICATIONS WITHDRAWN	9	1051	24	2627	151	29489	11	1482			16	9110		
FILES CLOSED FOR INCOMPLETENESS	2	95	4	389	49	8304	1	113			2	263		
1950 OR EARLIER	121	11013	308	25291	945	84363	137	5589	4	5796	199	15555	10	258
APPLICATION APPROVED, NOT ACCEPTED	8	642	19	1522	74	5462	8	364	1	461	8	488	1	20
APPLICATIONS DENIED	36	2648	37	2306	316	29448	46	1574			39	3528	2	18
APPLICATIONS WITHDRAWN	16	1187	20	1732	209	20119	8	156			12	784		
FILES CLOSED FOR INCOMPLETENESS	1	46	4	268	51	4230	3	175	1	247	6	385		
AGE UNKNOWN														
LOANS ORIGINATED														
APPLICATION APPROVED, NOT ACCEPTED														
APPLICATIONS DENIED														
APPLICATIONS WITHDRAWN														
FILES CLOSED FOR INCOMPLETENESS														

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LOCATION CATEGORY	Loans on 1- to 4-Family and Manufactured Home Dwellings													
	Home Purchase Loans				Refinancings		Home Improvement Loans		Loans on Dwellings For 5 or More Families		Nonoccupant Loans From Columns A, B, C & D		Loans On Manufactured Home Dwellings From Columns A, B, C & D	
	FHA, FSARS & VA		Conventional		C		D		E		F		G	
	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's	Number	\$000's
PRINCIPAL CITY 24'														
LOANS ORIGINATED	234	27892	666	80610	2556	318305	248	15216	13	17060	269	28485	16	319
APPLICATION APPROVED, NOT ACCEPTED	11	1395	35	3893	185	19796	13	977	2	5461	13	1027	2	33
APPLICATIONS DENIED	53	5164	75	7216	599	79401	70	2948			55	6530	4	73
APPLICATIONS WITHDRAWN	17	1554	49	5185	375	52779	17	946			21	8852	6	98
FILES CLOSED FOR INCOMPLETENESS	3	318	9	1068	121	15305	5	192	1	247	6	453		
MSAMD LESS PRINCIPAL CITY 25'														
LOANS ORIGINATED	123	14787	305	43603	1680	224601	171	9510	14	20216	138	19786	19	692
APPLICATION APPROVED, NOT ACCEPTED	8	657	18	3038	113	14042	11	309	1	5600	6	688		
APPLICATIONS DENIED	28	2899	44	4018	412	56641	43	1330	2	3190	46	5602	12	457
APPLICATIONS WITHDRAWN	15	1649	34	3078	250	36176	14	1275	2	25495	17	2192	8	184
FILES CLOSED FOR INCOMPLETENESS	2	95	2	177	67	10257	1	113			3	425		

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA a	REPORTED PRICING DATA x	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/					MEAN	MEDIAN	
			1.50 - 1.99 a	2.00 - 2.49 a	2.50 - 2.99 a	3.00 - 3.99 a	4.00 - 4.99 a			5 OR MORE a
<b>BORROWER CHARACTERISTICS</b>										
<b>RACE 5/</b>										
AMERICAN INDIAN/ALASKA NATIVE										
ASIAN	5									
BLACK OR AFRICAN AMERICAN	1									
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND										
WHITE	257	3	3				1.58	1.54		
2 OR MORE MINORITY RACES										
JOINT (WHITE MINORITY RACE)	1									
RACE NOT AVAILABLE 6/	5									
<b>ETHNICITY 7/</b>										
HISPANIC OR LATINO	4									
NOT HISPANIC OR LATINO	260	3	3				1.58	1.54		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	2									
ETHNICITY NOT AVAILABLE 6/	3									
<b>MINORITY STATUS 8/</b>										
WHITE NON-HISPANIC	250	3	3				1.58	1.54		
OTHERS, INCLUDING HISPANIC	13									
<b>INCOME 9/</b>										
LESS THAN 50% OF MSA/MD MEDIAN	46	2	2				1.53	1.53		
50-79% OF MSA/MD MEDIAN	85									
80-99% OF MSA/MD MEDIAN	53									
100-119% OF MSA/MD MEDIAN	29	1	1				1.68	1.68		
120% OR MORE OF MSA/MD MEDIAN	53									
INCOME NOT AVAILABLE 6/	3									
<b>GENDER 19/</b>										
MALE	91	1	1				1.68	1.68		
FEMALE	69	1	1				1.51	1.51		
JOINT (MALE/FEMALE)	108	1	1				1.54	1.54		
GENDER NOT AVAILABLE 6/	1									
<b>CENSUS TRACT CHARACTERISTICS 10/</b>										
<b>RACIALETHNIC COMPOSITION 11/</b>										
LESS THAN 10% MINORITY	250	3	3				1.58	1.54		
10-19% MINORITY	15									
20-49% MINORITY	4									
50-79% MINORITY										
80-100% MINORITY										
<b>INCOME CHARACTERISTICS 12/ 13/</b>										
LOW INCOME										
MODERATE INCOME	15									
MIDDLE INCOME	191	3	3				1.58	1.54		
UPPER INCOME	63									

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA \$000's	REPORTED PRICING DATA \$000's	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/					MEAN 30/ \$000's	MEDIAN 31/ \$000's
			1.50 - 1.99	2.00 - 2.49	2.50 - 2.99	3.00 - 3.99	4.00 - 4.99		
			\$000's	\$000's	\$000's	\$000's	\$000's		
<b>BORROWER CHARACTERISTICS</b>									
<b>RACE 5/</b>									
AMERICAN INDIAN/ALASKA NATIVE									
ASIAN	670								
BLACK OR AFRICAN AMERICAN	140								
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND									
WHITE	29333	233	233				1.60	1.54	
2 OR MORE MINORITY RACES									
JOINT (WHITE/MINORITY RACE)	107								
RACE NOT AVAILABLE 6/	510								
<b>ETHNICITY 7/</b>									
HISPANIC OR LATINO	440								
NOT HISPANIC OR LATINO	29668	233	233				1.60	1.54	
JOINT (HISPANIC OR LATINO/NOT HISPANIC OR LATINO)	279								
ETHNICITY NOT AVAILABLE 6/	373								
<b>MINORITY STATUS 8/</b>									
WHITE NON-HISPANIC	28461	233	233				1.60	1.54	
OTHERS, INCLUDING HISPANIC	1636								
<b>INCOME 9/</b>									
LESS THAN 50% OF MSA/MD MEDIAN	3470	119	119				1.52	1.51	
50-79% OF MSA/MD MEDIAN	8763								
80-99% OF MSA/MD MEDIAN	6026								
100-119% OF MSA/MD MEDIAN	3814	114	114				1.68	1.68	
120% OR MORE OF MSA/MD MEDIAN	8316								
INCOME NOT AVAILABLE 6/	371								
<b>GENDER 10/</b>									
MALE	8926	114	114				1.68	1.68	
FEMALE	7101	67	67				1.51	1.51	
JOINT (MALE/FEMALE)	14601	52	52				1.54	1.54	
GENDER NOT AVAILABLE 6/	132								
<b>CENSUS TRACT CHARACTERISTICS 10/</b>									
<b>RACIALETHNIC COMPOSITION 11/</b>									
LESS THAN 10% MINORITY	29039	233	233				1.60	1.54	
10-19% MINORITY	1190								
20-49% MINORITY	531								
50-79% MINORITY									
80-100% MINORITY									
<b>INCOME CHARACTERISTICS 12/ 13/</b>									
LOW INCOME									
MODERATE INCOME	1276								
MIDDLE INCOME	20710	233	233				1.60	1.54	
UPPER INCOME	8774								

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA a	REPORTED PRICING DATA x	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/						MEAN	MEDIAN
			1.50 - 1.99 a	2.00 - 2.49 a	2.50 - 2.99 a	3.00 - 3.99 a	4.00 - 4.99 a	5 OR MORE a		
			MSA/MD: 36780 - OSHKOSH-NEENAH, WI							
<b>BORROWER CHARACTERISTICS</b>										
<b>RACE 5/</b>										
AMERICAN INDIAN/ALASKA NATIVE										
ASIAN										
BLACK OR AFRICAN AMERICAN										
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND										
WHITE	65									
2 OR MORE MINORITY RACES										
JOINT (WHITE/MINORITY RACE)	1									
RACE NOT AVAILABLE 6/										
<b>ETHNICITY 7/</b>										
HISPANIC OR LATINO	1									
NOT HISPANIC OR LATINO	65									
JOINT (HISPANIC OR LATINO/NOT HISPANIC OR LATINO)										
ETHNICITY NOT AVAILABLE 6/										
<b>MINORITY STATUS 8/</b>										
WHITE NON-HISPANIC	64									
OTHERS, INCLUDING HISPANIC	2									
<b>INCOME 9/</b>										
LESS THAN 50% OF MSA/MD MEDIAN	4									
50-79% OF MSA/MD MEDIAN	13									
80-99% OF MSA/MD MEDIAN	18									
100-119% OF MSA/MD MEDIAN	12									
120% OR MORE OF MSA/MD MEDIAN	19									
INCOME NOT AVAILABLE 6/										
<b>GENDER 10/</b>										
MALE	32									
FEMALE	4									
JOINT (MALE/FEMALE)	30									
GENDER NOT AVAILABLE 6/										
<b>CENSUS TRACT CHARACTERISTICS 10/</b>										
<b>RACIALETHNIC COMPOSITION 11/</b>										
LESS THAN 10% MINORITY	61									
10-19% MINORITY	4									
20-49% MINORITY	1									
50-79% MINORITY										
80-100% MINORITY										
<b>INCOME CHARACTERISTICS 12/ 13/</b>										
LOW INCOME										
MODERATE INCOME	3									
MIDDLE INCOME	46									
UPPER INCOME	17									

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA \$000's	REPORTED PRICING DATA \$000's	MSA/M: 36780 - OSHKOSH-NEENAH, WI						MEAN 30/ \$000's	MEDIAN 31/ \$000's
			PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/							
			1.50 - 1.99 \$000's	2.00 - 2.49 \$000's	2.50 - 2.99 \$000's	3.00 - 3.99 \$000's	4.00 - 4.99 \$000's	5 OR MORE \$000's		
<b>BORROWER CHARACTERISTICS</b>										
<b>RACE 5/</b>										
AMERICAN INDIAN/ALASKA NATIVE										
ASIAN										
BLACK OR AFRICAN AMERICAN										
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND										
WHITE	9595									
2 OR MORE MINORITY RACES										
JOINT (WHITE/MINORITY RACE)	117									
RACE NOT AVAILABLE 6/										
<b>ETHNICITY 7/</b>										
HISPANIC OR LATINO	112									
NOT HISPANIC OR LATINO	9600									
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)										
ETHNICITY NOT AVAILABLE 6/										
<b>MINORITY STATUS 8/</b>										
WHITE NON-HISPANIC	9483									
OTHERS, INCLUDING HISPANIC	229									
<b>INCOME 9/</b>										
LESS THAN 50% OF MSA/M MEDIAN	390									
50-79% OF MSA/M MEDIAN	1292									
80-99% OF MSA/M MEDIAN	2181									
100-119% OF MSA/M MEDIAN	1907									
120% OR MORE OF MSA/M MEDIAN	3942									
INCOME NOT AVAILABLE 6/										
<b>GENDER 19/</b>										
MALE	3801									
FEMALE	398									
JOINT (MALE/FEMALE)	5513									
GENDER NOT AVAILABLE 6/										
<b>CENSUS TRACT CHARACTERISTICS 10/</b>										
<b>RACIALETHNIC COMPOSITION 11/</b>										
LESS THAN 10% MINORITY	9019									
10-19% MINORITY	520									
20-49% MINORITY	173									
50-79% MINORITY										
80-100% MINORITY										
<b>INCOME CHARACTERISTICS 12/ 13/</b>										
LOW INCOME										
MODERATE INCOME	277									
MIDDLE INCOME	6416									
UPPER INCOME	3019									

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA #	REPORTED PRICING DATA #	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/						MEAN	MEDIAN
			1.50 - 1.99	2.00 - 2.49	2.50 - 2.99	3.00 - 3.99	4.00 - 4.99	5 OR MORE		
			#	#	#	#	#	#		
<b>BORROWER CHARACTERISTICS</b>										
<b>RACE 5/</b>										
AMERICAN INDIAN/ALASKA NATIVE	2									
ASIAN	11									
BLACK OR AFRICAN AMERICAN	1									
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND	1									
WHITE	726	15	9	3	1	2		2.16	1.97	
2 OR MORE MINORITY RACES										
JOINT (WHITE/MINORITY RACE)	2									
RACE NOT AVAILABLE 6/	24	1	1					1.94	1.94	
<b>ETHNICITY 7/</b>										
HISPANIC OR LATINO	6									
NOT HISPANIC OR LATINO	732	15	9	3	1	2		2.16	1.97	
JOINT (HISPANIC OR LATINO/NOT HISPANIC OR LATINO)	4									
ETHNICITY NOT AVAILABLE 6/	25	1	1					1.94	1.94	
<b>MINORITY STATUS 8/</b>										
WHITE NON-HISPANIC	714	15	9	3	1	2		2.16	1.97	
OTHERS, INCLUDING HISPANIC	27									
<b>INCOME 9/</b>										
LESS THAN 50% OF MSA/MD MEDIAN	88	4	2	2				2.11	2.10	
50-79% OF MSA/MD MEDIAN	193	6	4	1		1		2.05	1.90	
80-99% OF MSA/MD MEDIAN	112	2	1			1		2.67	2.67	
100-119% OF MSA/MD MEDIAN	79	1	1					1.90	1.90	
120% OR MORE OF MSA/MD MEDIAN	279	2	1	1				2.28	2.28	
INCOME NOT AVAILABLE 6/	15	1	1					1.81	1.81	
<b>GENDER 19/</b>										
MALE	197	4	3		1			2.10	1.94	
FEMALE	143	4	2	2				2.05	2.03	
JOINT (MALE/FEMALE)	414	7	4	1		2		2.26	1.89	
GENDER NOT AVAILABLE 6/	13	1	1					1.94	1.94	
<b>CENSUS TRACT CHARACTERISTICS 10/</b>										
<b>RACIALETHNIC COMPOSITION 11/</b>										
LESS THAN 10% MINORITY	713	15	9	3	1	2		2.17	1.97	
10-19% MINORITY	42									
20-49% MINORITY	12	1	1					1.81	1.81	
50-79% MINORITY										
80-100% MINORITY										
<b>INCOME CHARACTERISTICS 12/ 13/</b>										
LOW INCOME										
MODERATE INCOME	26									
MIDDLE INCOME	514	13	9	3		1		2.05	1.92	
UPPER INCOME	227	3	1		1	1		2.94	2.63	

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA \$000's	REPORTED PRICING DATA \$000's	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/					MEAN 30/ \$000's	MEDIAN 31/ \$000's
			1.50 - 1.99	2.00 - 2.49	2.50 - 2.99	3.00 - 3.99	4.00 - 4.99		
			\$000's	\$000's	\$000's	\$000's	\$000's		
<b>BORROWER CHARACTERISTICS</b>									
<b>RACE 5/</b>									
AMERICAN INDIAN/ALASKA NATIVE	126								
ASIAN	1552								
BLACK OR AFRICAN AMERICAN	120								
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND	42								
WHITE	99702	1734	887	211	518	118	2.22	1.99	
2 OR MORE MINORITY RACES									
JOINT (WHITE/MINORITY RACE)	276								
RACE NOT AVAILABLE 6/	4226	80	80				1.94	1.94	
<b>ETHNICITY 7/</b>									
HISPANIC OR LATINO	534								
NOT HISPANIC OR LATINO	100591	1734	887	211	518	118	2.22	1.99	
JOINT (HISPANIC OR LATINO/NOT HISPANIC OR LATINO)	515								
ETHNICITY NOT AVAILABLE 6/	4404	80	80				1.94	1.94	
<b>MINORITY STATUS 8/</b>									
WHITE NON-HISPANIC	98375	1734	887	211	518	118	2.22	1.99	
OTHERS, INCLUDING HISPANIC	3165								
<b>INCOME 9/</b>									
LESS THAN 50% OF MSA/MD MEDIAN	6180	331	197	134			2.09	1.89	
50-79% OF MSA/MD MEDIAN	17754	546	377	77		92	2.03	1.89	
80-99% OF MSA/MD MEDIAN	12486	93	67			26	2.36	1.97	
100-119% OF MSA/MD MEDIAN	10062	65	65				1.90	1.90	
120% OR MORE OF MSA/MD MEDIAN	57219	661	143		518		2.48	2.63	
INCOME NOT AVAILABLE 6/	2343	118	118				1.81	1.81	
<b>GENDER 18/</b>									
MALE	22373	736	218		518		2.42	2.63	
FEMALE	13007	372	238	134			1.99	1.86	
JOINT (MALE/FEMALE)	68469	626	431	77		118	2.11	1.82	
GENDER NOT AVAILABLE 6/	2195	80	80				1.94	1.94	
<b>CENSUS TRACT CHARACTERISTICS 10/</b>									
<b>RACIALETHNIC COMPOSITION 11/</b>									
LESS THAN 10% MINORITY	99071	1696	849	211	518	118	2.23	1.99	
10-19% MINORITY	4961								
20-49% MINORITY	2112	118	118				1.81	1.81	
50-79% MINORITY									
80-100% MINORITY									
<b>INCOME CHARACTERISTICS 12/ 13/</b>									
LOW INCOME									
MODERATE INCOME	1925								
MIDDLE INCOME	65238	1087	850	211		26	1.95	1.90	
UPPER INCOME	38881	727	117		518	92	2.58	2.63	

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA a	REPORTED PRICING DATA x	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/							MEAN	MEDIAN
			3.50 - 3.99 a	4.00 - 4.49 a	4.50 - 4.99 a	5.00 - 5.99 a	6.00 - 6.99 a	7 OR MORE a			
<b>BORROWER CHARACTERISTICS</b>											
<b>RACE 5/</b>											
AMERICAN INDIAN/ALASKA NATIVE											
ASIAN											
BLACK OR AFRICAN AMERICAN											
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND											
WHITE	16	4		1	1	2			4.92	5.06	
2 OR MORE MINORITY RACES											
JOINT (WHITE/MINORITY RACE)											
RACE NOT AVAILABLE 6/	1										
<b>ETHNICITY 7/</b>											
HISPANIC OR LATINO											
NOT HISPANIC OR LATINO	16	4		1	1	2			4.92	5.06	
JOINT (HISPANIC OR LATINO/NOT HISPANIC OR LATINO)											
ETHNICITY NOT AVAILABLE 6/	1										
<b>MINORITY STATUS 8/</b>											
WHITE NON-HISPANIC	16	4		1	1	2			4.92	5.06	
OTHERS, INCLUDING HISPANIC											
<b>INCOME 9/</b>											
LESS THAN 50% OF MSA/MD MEDIAN											
50-79% OF MSA/MD MEDIAN	2	3		1		2			4.87	5.34	
80-99% OF MSA/MD MEDIAN	3										
100-119% OF MSA/MD MEDIAN											
120% OR MORE OF MSA/MD MEDIAN	11	1			1				4.77	4.77	
INCOME NOT AVAILABLE 6/	1										
<b>GENDER 18/</b>											
MALE	3	2		1		1			4.72	4.72	
FEMALE											
JOINT (MALE/FEMALE)	14	2			1	1			5.13	5.13	
GENDER NOT AVAILABLE 6/											
<b>CENSUS TRACT CHARACTERISTICS 10/</b>											
<b>RACIALETHNIC COMPOSITION 11/</b>											
LESS THAN 10% MINORITY	16	4		1	1	2			4.92	5.06	
10-19% MINORITY	1										
20-49% MINORITY											
50-79% MINORITY											
80-100% MINORITY											
<b>INCOME CHARACTERISTICS 12/ 13/</b>											
LOW INCOME		1					1		5.34	5.34	
MODERATE INCOME											
MIDDLE INCOME	6	2		1		1			4.79	4.79	
UPPER INCOME	11	1			1				4.77	4.77	

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/		PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/							MEAN 30/	MEDIAN 31/
	NO REPORTED PRICING DATA \$000's	REPORTED PRICING DATA \$000's	3.50 - 3.99	4.00 - 4.49	4.50 - 4.99	5.00 - 5.99	6.00 - 6.99	7 OR MORE			
			\$000's	\$000's	\$000's	\$000's	\$000's	\$000's			
<b>BORROWER CHARACTERISTICS</b>											
<b>RACE 5/</b>											
AMERICAN INDIAN/ALASKA NATIVE											
ASIAN											
BLACK OR AFRICAN AMERICAN											
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND											
WHITE	893	71		3	46	22			4.92	4.77	
2 OR MORE MINORITY RACES											
JOINT (WHITE/MINORITY RACE)											
RACE NOT AVAILABLE 6/	74										
<b>ETHNICITY 7/</b>											
HISPANIC OR LATINO											
NOT HISPANIC OR LATINO	893	71		3	46	22			4.92	4.77	
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)											
ETHNICITY NOT AVAILABLE 6/	74										
<b>MINORITY STATUS 8/</b>											
WHITE NON-HISPANIC	893	71		3	46	22			4.92	4.77	
OTHERS, INCLUDING HISPANIC											
<b>INCOME 9/</b>											
LESS THAN 50% OF MSA/MD MEDIAN											
50-79% OF MSA/MD MEDIAN	32	25		3		22			5.21	5.34	
80-99% OF MSA/MD MEDIAN	51										
100-119% OF MSA/MD MEDIAN											
120% OR MORE OF MSA/MD MEDIAN	820	46			46				4.77	4.77	
INCOME NOT AVAILABLE 6/	64										
<b>GENDER 18/</b>											
MALE	59	22		3		19			5.17	5.34	
FEMALE											
JOINT (MALE/FEMALE)	908	49			46	3			4.81	4.77	
GENDER NOT AVAILABLE 6/											
<b>CENSUS TRACT CHARACTERISTICS 10/</b>											
<b>RACIALETHNIC COMPOSITION 11/</b>											
LESS THAN 10% MINORITY	949	71		3	46	22			4.92	4.77	
10-19% MINORITY	18										
20-49% MINORITY											
50-79% MINORITY											
80-100% MINORITY											
<b>INCOME CHARACTERISTICS 12/ 13/</b>											
LOW INCOME		19				19			5.34	5.34	
MODERATE INCOME		6		3		3			4.79	4.79	
MIDDLE INCOME	558	46							4.77	4.77	
UPPER INCOME	408				46						

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BORROWER OR CENSUS TRACT CHARACTERISTICS	MSA/MD: 36780 - OSHKOSH-NEENAH, WI										
	15/ NO REPORTED PRICING DATA #	REPORTED PRICING DATA #	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/						MEAN	MEDIAN	HOEPA LOANS 17/ #
			1.50 - 1.99 #	2.00 - 2.49 #	2.50 - 2.99 #	3.00 - 3.99 #	4.00 - 4.99 #	5 OR MORE #			
<b>BORROWER CHARACTERISTICS</b>											
<b>RACE 5/</b>											
AMERICAN INDIAN/ALASKA NATIVE											
ASIAN	4										
BLACK OR AFRICAN AMERICAN	1										
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND											
WHITE	166	5	4		1			1.99	1.89		
2 OR MORE MINORITY RACES											
JOINT (WHITE/MINORITY RACE)	1										
RACE NOT AVAILABLE 6/	11										
<b>ETHNICITY 7/</b>											
HISPANIC OR LATINO	1										
NOT HISPANIC OR LATINO	170	4	3		1			2.04	1.90		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	1	1	1					1.78	1.78		
ETHNICITY NOT AVAILABLE 6/	11										
<b>MINORITY STATUS 8/</b>											
WHITE NON-HISPANIC	162	4	3		1			2.04	1.90		
OTHERS, INCLUDING HISPANIC	8	1	1					1.78	1.78		
<b>INCOME 9/</b>											
LESS THAN 50% OF MSA/MD MEDIAN	10										
50-79% OF MSA/MD MEDIAN	30										
80-99% OF MSA/MD MEDIAN	19	2	2					1.72	1.72		
100-119% OF MSA/MD MEDIAN	23										
120% OR MORE OF MSA/MD MEDIAN	53	1	1					1.78	1.78		
INCOME NOT AVAILABLE 6/	48	2	1		1			2.36	2.36		
<b>GENDER 18/</b>											
MALE	53	2	2					1.90	1.90		
FEMALE	35	1	1					1.55	1.55		
JOINT (MALE/FEMALE)	90	2	1		1			2.30	2.30		
GENDER NOT AVAILABLE 6/	5										
<b>CENSUS TRACT CHARACTERISTICS 10/</b>											
<b>RACIALETHNIC COMPOSITION 11/</b>											
LESS THAN 10% MINORITY	168	4	3		1			2.04	1.90		
10-19% MINORITY	8	1	1					1.78	1.78		
20-49% MINORITY	6										
50-79% MINORITY											
80-100% MINORITY											
<b>INCOME CHARACTERISTICS 12/ 13/</b>											
LOW INCOME	9										
MODERATE INCOME	9										
MIDDLE INCOME	135	5	4		1			1.99	1.89		
UPPER INCOME	38										

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA \$000%	REPORTED PRICING DATA \$000%	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/					MEAN 30/ MEDIAN 31/	HOEPA LOANS 17/ \$000%
			1.50 - 1.99 \$000%	2.00 - 2.49 \$000%	2.50 - 2.99 \$000%	3.00 - 3.99 \$000%	4.00 - 4.99 \$000%		
<b>BORROWER CHARACTERISTICS</b>									
<b>RACE 5/</b>									
AMERICAN INDIAN/ALASKA NATIVE									
ASIAN	426								
BLACK OR AFRICAN AMERICAN	114								
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND									
WHITE	22136	561	484		77		1.90	1.78	
2 OR MORE MINORITY RACES									
JOINT (WHITE/MINORITY RACE)	267								
RACE NOT AVAILABLE 6/	1677								
<b>ETHNICITY 7/</b>									
HISPANIC OR LATINO	83								
NOT HISPANIC OR LATINO	22846	353	276		77		1.97	1.89	
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	94	208	208				1.78	1.78	
ETHNICITY NOT AVAILABLE 6/	1597								
<b>MINORITY STATUS 8/</b>									
WHITE NON-HISPANIC	21725	353	276		77		1.97	1.89	
OTHERS, INCLUDING HISPANIC	984	208	208				1.78	1.78	
<b>INCOME 9/</b>									
LESS THAN 50% OF MSA/MD MEDIAN	899								
50-79% OF MSA/MD MEDIAN	3091								
80-99% OF MSA/MD MEDIAN	2679	222	222				1.69	1.55	
100-119% OF MSA/MD MEDIAN	3436								
120% OR MORE OF MSA/MD MEDIAN	8543	208	208				1.78	1.78	
INCOME NOT AVAILABLE 6/	5972	131	54		77		2.43	2.81	
<b>GENDER 18/</b>									
MALE	6571	147	147				1.89	1.89	
FEMALE	4056	129	129				1.55	1.55	
JOINT (MALE/FEMALE)	13185	285	208		77		2.06	1.78	
GENDER NOT AVAILABLE 6/	768								
<b>CENSUS TRACT CHARACTERISTICS 10/</b>									
<b>RACIALETHNIC COMPOSITION 11/</b>									
LESS THAN 10% MINORITY	22580	353	276		77		1.97	1.89	
10-19% MINORITY	1054	208	208				1.78	1.78	
20-49% MINORITY	976								
50-79% MINORITY									
80-100% MINORITY									
<b>INCOME CHARACTERISTICS 12/ 13/</b>									
LOW INCOME									
MODERATE INCOME	960								
MIDDLE INCOME	17542	561	484		77		1.90	1.78	
UPPER INCOME	6118								

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BORROWER OR CENSUS TRACT CHARACTERISTICS	MSAMD: 36780 - OSHKOSH-NEENAH, WI										
	15/ NO REPORTED PRICING DATA #	REPORTED PRICING DATA #	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/						MEAN	MEDIAN	HOEPA LOANS 17/ #
			1.50 - 1.99 #	2.00 - 2.49 #	2.50 - 2.99 #	3.00 - 3.99 #	4.00 - 4.99 #	5 OR MORE #			
<b>BORROWER CHARACTERISTICS</b>											
<b>RACE 5/</b>											
AMERICAN INDIAN/ALASKA NATIVE											
ASIAN											
BLACK OR AFRICAN AMERICAN											
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND											
WHITE	78	1	1					1.73	1.73		
2 OR MORE MINORITY RACES											
JOINT (WHITE/MINORITY RACE)	2										
RACE NOT AVAILABLE 6/	10	1		1				2.13	2.13		
<b>ETHNICITY 7/</b>											
HISPANIC OR LATINO											
NOT HISPANIC OR LATINO	78	1	1					1.73	1.73		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	1										
ETHNICITY NOT AVAILABLE 6/	11	1		1				2.13	2.13		
<b>MINORITY STATUS 8/</b>											
WHITE NON-HISPANIC	75	1	1					1.73	1.73		
OTHERS, INCLUDING HISPANIC	3										
<b>INCOME 9/</b>											
LESS THAN 50% OF MSAMD MEDIAN	4										
50-79% OF MSAMD MEDIAN	11	2	1	1				1.93	1.93		
80-99% OF MSAMD MEDIAN	4										
100-119% OF MSAMD MEDIAN	5										
120% OR MORE OF MSAMD MEDIAN	15										
INCOME NOT AVAILABLE 6/	51										
<b>GENDER 18/</b>											
MALE	31	1	1					1.73	1.73		
FEMALE	4										
JOINT (MALE/FEMALE)	48										
GENDER NOT AVAILABLE 6/	7	1		1				2.13	2.13		
<b>CENSUS TRACT CHARACTERISTICS 10/</b>											
<b>RACIALETHNIC COMPOSITION 11/</b>											
LESS THAN 10% MINORITY	81	2	1	1				1.93	1.93		
10-19% MINORITY	5										
20-49% MINORITY	4										
50-79% MINORITY											
80-100% MINORITY											
<b>INCOME CHARACTERISTICS 12/ 13/</b>											
LOW INCOME											
MODERATE INCOME	9	1	1					1.73	1.73		
MIDDLE INCOME	65										
UPPER INCOME	16	1		1				2.13	2.13		

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA \$000%	REPORTED PRICING DATA \$000%	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/					MEAN 30/ 2.13	MEDIAN 31/ 2.13	HOEPA LOANS 17/ \$000%
			1.50 - 1.99 \$000%	2.00 - 2.49 \$000%	2.50 - 2.99 \$000%	3.00 - 3.99 \$000%	4.00 - 4.99 \$000%			
<b>BORROWER CHARACTERISTICS</b>										
<b>RACE 5/</b>										
AMERICAN INDIAN/ALASKA NATIVE										
ASIAN										
BLACK OR AFRICAN AMERICAN										
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND										
WHITE	11627	95	95				1.73	1.73		
2 OR MORE MINORITY RACES										
JOINT (WHITE/MINORITY RACE)	285									
RACE NOT AVAILABLE 6/	1496	118		118			2.13	2.13		
<b>ETHNICITY 7/</b>										
HISPANIC OR LATINO										
NOT HISPANIC OR LATINO	11311	95	95				1.73	1.73		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	221									
ETHNICITY NOT AVAILABLE 6/	1876	118		118			2.13	2.13		
<b>MINORITY STATUS 8/</b>										
WHITE NON-HISPANIC	10923	95	95				1.73	1.73		
OTHERS, INCLUDING HISPANIC	506									
<b>INCOME 9/</b>										
LESS THAN 50% OF MSA/MD MEDIAN	346									
50-79% OF MSA/MD MEDIAN	1087	213	95	118			1.95	2.13		
80-99% OF MSA/MD MEDIAN	468									
100-119% OF MSA/MD MEDIAN	773									
120% OR MORE OF MSA/MD MEDIAN	2316									
INCOME NOT AVAILABLE 6/	8418									
<b>GENDER 18/</b>										
MALE	4408	95	95				1.73	1.73		
FEMALE	378									
JOINT (MALE/FEMALE)	7849									
GENDER NOT AVAILABLE 6/	773	118		118			2.13	2.13		
<b>CENSUS TRACT CHARACTERISTICS 10/</b>										
<b>RACIALETHNIC COMPOSITION 11/</b>										
LESS THAN 10% MINORITY	12118	213	95	118			1.95	2.13		
10-19% MINORITY	621									
20-49% MINORITY	668									
50-79% MINORITY										
80-100% MINORITY										
<b>INCOME CHARACTERISTICS 12/ 13/</b>										
LOW INCOME										
MODERATE INCOME	984	95	95				1.73	1.73		
MIDDLE INCOME	9574									
UPPER INCOME	2850	118		118			2.13	2.13		

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA #	REPORTED PRICING DATA #	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/							MEAN	MEDIAN	HOEPA LOANS 17/ #
			1.50 - 1.99	2.00 - 2.49	2.50 - 2.99	3.00 - 3.99	4.00 - 4.99	5 OR MORE				
			#	#	#	#	#	#				
<b>BORROWER CHARACTERISTICS</b>												
<b>RACE 5/</b>												
AMERICAN INDIAN/ALASKA NATIVE	4											
ASIAN	23	1	1						1.64	1.64		
BLACK OR AFRICAN AMERICAN	2											
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND	1											
WHITE	3340	46	25	10		5		3	2.54	1.97	3	
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	29											
RACE NOT AVAILABLE 6/	100	1	1						1.52	1.52		
<b>ETHNICITY 7/</b>												
HISPANIC OR LATINO	18	1	1						1.99	1.99		
NOT HISPANIC OR LATINO	3353	46	25	10		5		3	2.53	1.90	3	
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	18											
ETHNICITY NOT AVAILABLE 6/	110	1	1						1.52	1.52		
<b>MINORITY STATUS 8/</b>												
WHITE NON-HISPANIC	3286	45	24	10		5		3	2.55	1.95	3	
OTHERS, INCLUDING HISPANIC	93	2	2						1.82	1.82		
<b>INCOME 9/</b>												
LESS THAN 50% OF MSA/MD MEDIAN	184	7	4	1		2			2.11	1.85		
50-79% OF MSA/MD MEDIAN	553	15	8	2		3		1	2.59	1.99		
80-99% OF MSA/MD MEDIAN	468	7	2	3				2	3.87	2.06	2	
100-119% OF MSA/MD MEDIAN	393	7	4	1				2	2.53	1.81	1	
120% OR MORE OF MSA/MD MEDIAN	1780	12	9	3					1.81	1.73		
INCOME NOT AVAILABLE 6/	120											
<b>GENDER 18/</b>												
MALE	591	10	4	3		2			2.84	2.07	1	
FEMALE	435	14	9	3		1			2.29	1.82		
JOINT (MALE/FEMALE)	2406	23	13	4		2		3	2.53	1.81	2	
GENDER NOT AVAILABLE 6/	67	1	1						1.52	1.52		
<b>CENSUS TRACT CHARACTERISTICS 10/</b>												
<b>RACIALETHNIC COMPOSITION 11/</b>												
LESS THAN 10% MINORITY	3261	44	25	10		4		3	2.37	1.83	2	
10-19% MINORITY	170	3	2					1	4.18	1.99	1	
20-49% MINORITY	68	1							3.29	3.29		
50-79% MINORITY												
80-100% MINORITY												
<b>INCOME CHARACTERISTICS 12/ 13/</b>												
<b>LOW INCOME</b>												
MODERATE INCOME	93	1		1					2.09	2.09		
MIDDLE INCOME	2244	36	21	5		5		2	2.64	1.90	2	
UPPER INCOME	1162	11	6	4				1	2.10	1.75	1	

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA \$000%	REPORTED PRICING DATA \$000%	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/						MEAN 30/ MEDIAN 31/	HOEPA LOANS 17/ \$000%		
			1.50 - 1.99 \$000%	2.00 - 2.49 \$000%	2.50 - 2.99 \$000%	3.00 - 3.99 \$000%	4.00 - 4.99 \$000%	5 OR MORE \$000%				
<b>BORROWER CHARACTERISTICS</b>												
<b>RACE 5/</b>												
AMERICAN INDIAN/ALASKA NATIVE	715											
ASIAN	3968	283	283					1.64	1.64			
BLACK OR AFRICAN AMERICAN	194											
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND	121											
WHITE	436761	4157	2333	1067			292	301	164	2.38	1.99	291
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	3699											
RACE NOT AVAILABLE 6/	13060	351	351							1.52	1.52	
<b>ETHNICITY 7/</b>												
HISPANIC OR LATINO	2073	125	125							1.99	1.99	
NOT HISPANIC OR LATINO	440156	4315	2491	1067			292	301	164	2.34	1.81	291
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	1976											
ETHNICITY NOT AVAILABLE 6/	14313	351	351							1.52	1.52	
<b>MINORITY STATUS 8/</b>												
WHITE NON-HISPANIC	430059	4032	2208	1067			292	301	164	2.39	1.95	291
OTHERS, INCLUDING HISPANIC	12626	408	408							1.75	1.64	
<b>INCOME 9/</b>												
LESS THAN 50% OF MSA/MD MEDIAN	12155	300	142	69			89			2.20	2.23	
50-79% OF MSA/MD MEDIAN	46475	1049	631	106			203	67	43	2.43	1.99	
80-99% OF MSA/MD MEDIAN	48922	623	144	358					121	3.29	2.06	121
100-119% OF MSA/MD MEDIAN	43004	715	369	112					234	2.65	1.81	170
120% OR MORE OF MSA/MD MEDIAN	293621	2104	1681	423						1.77	1.70	
INCOME NOT AVAILABLE 6/	14341											
<b>GENDER 18/</b>												
MALE	67512	869	506	262			64		37	2.25	1.99	37
FEMALE	41950	1187	644	420			80		43	2.21	1.99	
JOINT (MALE/FEMALE)	341436	2384	1466	385			148	301	84	2.42	1.78	254
GENDER NOT AVAILABLE 6/	7711	351	351							1.52	1.52	
<b>CENSUS TRACT CHARACTERISTICS 10/</b>												
<b>RACIALETHNIC COMPOSITION 11/</b>												
LESS THAN 10% MINORITY	426789	4398	2666	1067			237	301	127	2.23	1.78	254
10-19% MINORITY	19774	338	301						37	2.64	1.99	37
20-49% MINORITY	11955	55					55			3.29	3.29	
50-79% MINORITY												
80-100% MINORITY												
<b>INCOME CHARACTERISTICS 12/ 13/</b>												
LOW INCOME												
MODERATE INCOME	7018	64		64						2.09	2.09	
MIDDLE INCOME	276357	2963	1900	476			292	131	164	2.40	1.81	121
UPPER INCOME	178143	1764	1067	527				170		2.06	1.64	170

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA #	REPORTED PRICING DATA #	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/							MEAN	MEDIAN	HOEPA LOANS 17/ #
			3.50 - 3.99 #	4.00 - 4.49 #	4.50 - 4.99 #	5.00 - 5.99 #	6.00 - 6.99 #	7 OR MORE #				
<b>BORROWER CHARACTERISTICS</b>												
<b>RACE 5/</b>												
AMERICAN INDIAN/ALASKA NATIVE												
ASIAN	1	1				1			5.48	5.48		
BLACK OR AFRICAN AMERICAN												
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND												
WHITE	149	19	4	3	5	5	2	4.85	4.70	2		
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)												
RACE NOT AVAILABLE 6/	8	3	1		1		1	6.57	4.72	1		
<b>ETHNICITY 7/</b>												
HISPANIC OR LATINO	1											
NOT HISPANIC OR LATINO	146	21	4	3	6	6	2	4.88	4.72	2		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	1											
ETHNICITY NOT AVAILABLE 6/	10	2	1				1	7.49	7.49	1		
<b>MINORITY STATUS 8/</b>												
WHITE NON-HISPANIC	145	19	4	3	5	5	2	4.85	4.70	2		
OTHERS, INCLUDING HISPANIC	3	1					1	5.48	5.48			
<b>INCOME 9/</b>												
LESS THAN 50% OF MSAMD MEDIAN	6											
50-79% OF MSAMD MEDIAN	22	4	3				1	4.14	3.75			
80-99% OF MSAMD MEDIAN	28	2			2			4.74	4.74			
100-119% OF MSAMD MEDIAN	23	6	1	1	2	2		4.66	4.67			
120% OR MORE OF MSAMD MEDIAN	76	11	1	2	2	3	3	5.76	5.01	3		
INCOME NOT AVAILABLE 6/	3											
<b>GENDER 18/</b>												
MALE	19	3	1		1	1		4.58	4.67			
FEMALE	20	2	1			1		4.51	4.51			
JOINT (MALE/FEMALE)	112	17	2	3	5	4	3	5.36	4.81	3		
GENDER NOT AVAILABLE 6/	7	1	1					3.53	3.53			
<b>CENSUS TRACT CHARACTERISTICS 10/</b>												
<b>RACIALETHNIC COMPOSITION 11/</b>												
LESS THAN 10% MINORITY	144	23	5	3	6	6	3	5.10	4.72	3		
10-19% MINORITY	13											
20-49% MINORITY	1											
50-79% MINORITY												
80-100% MINORITY												
<b>INCOME CHARACTERISTICS 12/ 13/</b>												
LOW INCOME												
MODERATE INCOME	4	1			1			4.70	4.70			
MIDDLE INCOME	106	13	4	2	3	2	2	5.12	4.64	2		
UPPER INCOME	49	9	1	1	2	4	1	5.12	5.01	1		

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA \$000%	REPORTED PRICING DATA \$000%	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/							MEAN 30/ MEDIAN 31/	HOEPA LOANS 17/ \$000%
			3.50 - 3.99 \$000%	4.00 - 4.49 \$000%	4.50 - 4.99 \$000%	5.00 - 5.99 \$000%	6.00 - 6.99 \$000%	7 OR MORE \$000%			
<b>BORROWER CHARACTERISTICS</b>											
<b>RACE 5/</b>											
AMERICAN INDIAN/ALASKA NATIVE											
ASIAN	161	29				29			5.48	5.48	
BLACK OR AFRICAN AMERICAN											
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND											
WHITE	6392	482	140	134	61	78		69	4.78	4.35	
2 OR MORE MINORITY RACES											
JOINT (WHITE/MINORITY RACE)											
RACE NOT AVAILABLE 6/	1043	140	66		58			16	4.93	4.72	
<b>ETHNICITY 7/</b>											
HISPANIC OR LATINO	80										
NOT HISPANIC OR LATINO	6399	569	140	134	119	107		69	4.81	4.64	
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	34										
ETHNICITY NOT AVAILABLE 6/	1983	82	66					16	5.08	3.53	
<b>MINORITY STATUS 8/</b>											
WHITE NON-HISPANIC	6238	482	140	134	61	78		69	4.78	4.35	
OTHERS, INCLUDING HISPANIC	275	29				29			5.48	5.48	
<b>INCOME 9/</b>											
LESS THAN 50% OF MSA/MD MEDIAN	168										
50-79% OF MSA/MD MEDIAN	825	154	125				29		4.06	3.79	
80-99% OF MSA/MD MEDIAN	935	22			22				4.75	4.81	
100-119% OF MSA/MD MEDIAN	750	109	15	32	33	29			4.60	4.64	
120% OR MORE OF MSA/MD MEDIAN	4008	366	66	102	64	49		85	5.25	4.72	
INCOME NOT AVAILABLE 6/	1810									85	
<b>GENDER 18/</b>											
MALE	537	57	19		9	29			4.72	5.48	
FEMALE	631	72	58			14			4.07	3.79	
JOINT (MALE/FEMALE)	5399	456	63	134	110	64		85	5.17	4.70	
GENDER NOT AVAILABLE 6/	1929	66	66						3.53	3.53	
<b>CENSUS TRACT CHARACTERISTICS 10/</b>											
<b>RACIALETHNIC COMPOSITION 11/</b>											
LESS THAN 10% MINORITY	7622	651	206	134	119	107		85	4.84	4.40	
10-19% MINORITY	819										
20-49% MINORITY	55										
50-79% MINORITY											
80-100% MINORITY											
<b>INCOME CHARACTERISTICS 12/ 13/</b>											
LOW INCOME											
MODERATE INCOME	77	9			9				4.70	4.70	
MIDDLE INCOME	4348	439	148	102	91	39		59	4.80	4.35	
UPPER INCOME	4071	203	58	32	19	68		26	4.93	4.81	

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA #	REPORTED PRICING DATA #	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/					MEAN	MEDIAN	HOEPA LOANS 17/ #
			1.50 - 1.99 #	2.00 - 2.49 #	2.50 - 2.99 #	3.00 - 3.99 #	4.00 - 4.99 #			
<b>BORROWER CHARACTERISTICS</b>										
<b>RACE 5/</b>										
AMERICAN INDIAN/ALASKA NATIVE										
ASIAN	2									
BLACK OR AFRICAN AMERICAN	1									
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND										
WHITE	180	5	3	1	1		2.10	1.88		
2 OR MORE MINORITY RACES										
JOINT (WHITE/MINORITY RACE)	2									
RACE NOT AVAILABLE 6/	7									
<b>ETHNICITY 7/</b>										
HISPANIC OR LATINO										
NOT HISPANIC OR LATINO	183	5	3	1	1		2.10	1.88		
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	1									
ETHNICITY NOT AVAILABLE 6/	8									
<b>MINORITY STATUS 8/</b>										
WHITE NON-HISPANIC	178	5	3	1	1		2.10	1.88		
OTHERS, INCLUDING HISPANIC	6									
<b>INCOME 9/</b>										
LESS THAN 50% OF MSA/MD MEDIAN	12	1	1				1.75	1.75		
50-79% OF MSA/MD MEDIAN	53	1		1			2.11	2.11		
80-99% OF MSA/MD MEDIAN	33	1			1		2.95	2.95		
100-119% OF MSA/MD MEDIAN	21									
120% OR MORE OF MSA/MD MEDIAN	72	2	2				1.85	1.85		
INCOME NOT AVAILABLE 6/	1									
<b>GENDER 18/</b>										
MALE	25	2	1	1			1.93	1.93		
FEMALE	35									
JOINT (MALE/FEMALE)	126	3	2		1		2.22	1.88		
GENDER NOT AVAILABLE 6/	6									
<b>CENSUS TRACT CHARACTERISTICS 10/</b>										
<b>RACIALETHNIC COMPOSITION 11/</b>										
LESS THAN 10% MINORITY	175	5	3	1	1		2.10	1.88		
10-19% MINORITY	14									
20-49% MINORITY	3									
50-79% MINORITY										
80-100% MINORITY										
<b>INCOME CHARACTERISTICS 12/ 13/</b>										
LOW INCOME										
MODERATE INCOME	5									
MIDDLE INCOME	133	3	1	1	1		2.27	2.11		
UPPER INCOME	54	2	2				1.85	1.85		

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MSA/MD: 36780 - OSHKOSH-NEENAH, WI

BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA \$000%	REPORTED PRICING DATA \$000%	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/					MEAN 30/ MEDIAN 31/	HOEPA LOANS 17/ \$000%
			1.50 - 1.99 \$000%	2.00 - 2.49 \$000%	2.50 - 2.99 \$000%	3.00 - 3.99 \$000%	4.00 - 4.99 \$000%		
<b>BORROWER CHARACTERISTICS</b>									
<b>RACE 5/</b>									
AMERICAN INDIAN/ALASKA NATIVE									
ASIAN	368								
BLACK OR AFRICAN AMERICAN	56								
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND									
WHITE	16775	272	141	99	32		2.07	1.88	
2 OR MORE MINORITY RACES									
JOINT (WHITE/MINORITY RACE)	276								
RACE NOT AVAILABLE 6/	653								
<b>ETHNICITY 7/</b>									
HISPANIC OR LATINO									
NOT HISPANIC OR LATINO	17145	272	141	99	32		2.07	1.88	
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	199								
ETHNICITY NOT AVAILABLE 6/	784								
<b>MINORITY STATUS 8/</b>									
WHITE NON-HISPANIC	16445	272	141	99	32		2.07	1.88	
OTHERS, INCLUDING HISPANIC	899								
<b>INCOME 9/</b>									
LESS THAN 50% OF MSA/MD MEDIAN	659	25	25				1.75	1.75	
50-79% OF MSA/MD MEDIAN	3560	99		99			2.11	2.11	
80-99% OF MSA/MD MEDIAN	2631	32			32		2.95	2.95	
100-119% OF MSA/MD MEDIAN	1818								
120% OR MORE OF MSA/MD MEDIAN	9588	116	116				1.86	1.88	
INCOME NOT AVAILABLE 6/	72								
<b>GENDER 18/</b>									
MALE	2281	124	25	99			2.04	2.11	
FEMALE	2349								
JOINT (MALE/FEMALE)	13141	148	116		32		2.09	1.88	
GENDER NOT AVAILABLE 6/	457								
<b>CENSUS TRACT CHARACTERISTICS 10/</b>									
<b>RACIALETHNIC COMPOSITION 11/</b>									
LESS THAN 10% MINORITY	16765	272	141	99	32		2.07	1.88	
10-19% MINORITY	990								
20-49% MINORITY	373								
50-79% MINORITY									
80-100% MINORITY									
<b>INCOME CHARACTERISTICS 12/ 13/</b>									
LOW INCOME									
MODERATE INCOME	229								
MIDDLE INCOME	11845	156	25	99	32		2.22	2.11	
UPPER INCOME	6054	116	116				1.86	1.88	

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA #	REPORTED PRICING DATA #	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/							MEAN	MEDIAN	HOEPA LOANS 17/ #
			3.50 - 3.99 #	4.00 - 4.49 #	4.50 - 4.99 #	5.00 - 5.99 #	6.00 - 6.99 #	7 OR MORE #				
<b>BORROWER CHARACTERISTICS</b>												
<b>RACE 5/</b>												
AMERICAN INDIAN/ALASKA NATIVE												
ASIAN	3											
BLACK OR AFRICAN AMERICAN	3											
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND												
WHITE	101	6		1			3	1	1	5.84	5.23	1
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)	1											
RACE NOT AVAILABLE 6/	5											
<b>ETHNICITY 7/</b>												
HISPANIC OR LATINO	3											
NOT HISPANIC OR LATINO	105	6		1			3	1	1	5.84	5.23	1
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	1											
ETHNICITY NOT AVAILABLE 6/	4											
<b>MINORITY STATUS 8/</b>												
WHITE NON-HISPANIC	98	6		1			3	1	1	5.84	5.23	1
OTHERS, INCLUDING HISPANIC	11											
<b>INCOME 9/</b>												
LESS THAN 50% OF MSA/MD MEDIAN	5											
50-79% OF MSA/MD MEDIAN	16	1					1			5.21	5.21	
80-99% OF MSA/MD MEDIAN	14	2					1		1	6.88	6.88	1
100-119% OF MSA/MD MEDIAN	16	1					1			5.23	5.23	
120% OR MORE OF MSA/MD MEDIAN	62	2		1					1	5.42	5.42	
INCOME NOT AVAILABLE 6/												
<b>GENDER 18/</b>												
MALE	20	1							1	8.54	8.54	1
FEMALE	18	1					1			5.21	5.21	
JOINT (MALE/FEMALE)	71	4		1			2	1		5.32	5.23	
GENDER NOT AVAILABLE 6/	4											
<b>CENSUS TRACT CHARACTERISTICS 10/</b>												
<b>RACIALETHNIC COMPOSITION 11/</b>												
LESS THAN 10% MINORITY	104	6		1			3	1	1	5.84	5.23	1
10-19% MINORITY	8											
20-49% MINORITY	1											
50-79% MINORITY												
80-100% MINORITY												
<b>INCOME CHARACTERISTICS 12/ 13/</b>												
LOW INCOME												
MODERATE INCOME	5	1							1	6.70	6.70	
MIDDLE INCOME	80	5		1			3		1	5.67	5.22	1
UPPER INCOME	28											

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/ NO REPORTED PRICING DATA \$000%	REPORTED PRICING DATA \$000%	PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/							HOEPA LOANS 17/ \$000%	
			3.50 - 3.99 \$000%	4.00 - 4.49 \$000%	4.50 - 4.99 \$000%	5.00 - 5.99 \$000%	6.00 - 6.99 \$000%	7 OR MORE \$000%	MEAN 30/ \$000%		MEDIAN 31/ \$000%
<b>BORROWER CHARACTERISTICS</b>											
<b>RACE 5/</b>											
AMERICAN INDIAN/ALASKA NATIVE											
ASIAN	48										
BLACK OR AFRICAN AMERICAN	135										
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND											
WHITE	2096	135		53		48	9	25	5.51	5.22	25
2 OR MORE MINORITY RACES											
JOINT (WHITE/MINORITY RACE)	20										
RACE NOT AVAILABLE 6/	129										
<b>ETHNICITY 7/</b>											
HISPANIC OR LATINO	36										
NOT HISPANIC OR LATINO	2243	135		53		48	9	25	5.51	5.22	25
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	30										
ETHNICITY NOT AVAILABLE 6/	90										
<b>MINORITY STATUS 8/</b>											
WHITE NON-HISPANIC	2060	135		53		48	9	25	5.51	5.22	25
OTHERS, INCLUDING HISPANIC	249										
<b>INCOME 9/</b>											
LESS THAN 50% OF MSA/MD MEDIAN	86										
50-79% OF MSA/MD MEDIAN	403	11				11			5.21	5.21	
80-99% OF MSA/MD MEDIAN	274	50				25		25	6.88	6.88	25
100-119% OF MSA/MD MEDIAN	349	12				12			5.23	5.23	
120% OR MORE OF MSA/MD MEDIAN	1296	62		53			9		4.50	4.13	
INCOME NOT AVAILABLE 6/											
<b>GENDER 18/</b>											
MALE	349	25						25	8.54	8.54	25
FEMALE	417	11				11			5.21	5.21	
JOINT (MALE/FEMALE)	1543	99		53		37	9		4.77	4.13	
GENDER NOT AVAILABLE 6/	99										
<b>CENSUS TRACT CHARACTERISTICS 10/</b>											
<b>RACIALETHNIC COMPOSITION 11/</b>											
LESS THAN 10% MINORITY	2279	135		53		48	9	25	5.51	5.22	25
10-19% MINORITY	119										
20-49% MINORITY	10										
50-79% MINORITY											
80-100% MINORITY											
<b>INCOME CHARACTERISTICS 12/ 13/</b>											
LOW INCOME		9									
MODERATE INCOME	97						9		6.70	6.70	
MIDDLE INCOME	1733	126		53		48		25	5.42	5.21	25
UPPER INCOME	578										

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BORROWER OR CENSUS TRACT CHARACTERISTICS	Applications Received 201		Loans Originated		Apps. Approved But Not Accepted		Applications Denied		Applications Withdrawn		Files Closed For Incompleteness	
	#	\$000's	#	\$000's	#	\$000's	#	\$000's	#	\$000's	#	\$000's
<b>BORROWER CHARACTERISTICS</b>												
<b>RACE 5/</b>												
AMERICAN INDIAN/ALASKA NATIVE	3	48	1	8			1	32	1		8	
ASIAN	1	27	1	27								
BLACK OR AFRICAN AMERICAN	1	35							1		35	
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND												
WHITE	46	944	25	473	2	33	9	218	10		220	
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)												
RACE NOT AVAILABLE 6/	4	59	1	30			1	10	2		19	
<b>ETHNICITY 7/</b>												
HISPANIC OR LATINO	4	52	2	35						2	16	
NOT HISPANIC OR LATINO	45	976	24	474	2	33	10	250	9		219	
JOINT (HISPANIC OR LATINO/NOT HISPANIC OR LATINO)	2	44	1	21						1	23	
ETHNICITY NOT AVAILABLE 6/	4	41	1	7			1	10	2		24	
<b>MINORITY STATUS 8/</b>												
WHITE NON-HISPANIC	41	874	22	439	2	33	9	218	8		184	
OTHERS, INCLUDING HISPANIC	11	206	5	82			1	32	5		82	
<b>INCOME 9/</b>												
LESS THAN 50% OF MSA/MD MEDIAN	23	325	10	127			5	101	8		97	
50-79% OF MSA/MD MEDIAN	23	605	15	373	1	13	3	89	4		130	
80-99% OF MSA/MD MEDIAN	6	134	2	34	1	20	2	57	1		23	
100-119% OF MSA/MD MEDIAN	1	32								1	32	
120% OR MORE OF MSA/MD MEDIAN	2	17	1	4			1	13				
INCOME NOT AVAILABLE 6/												
<b>GENDER 10/</b>												
MALE	11	175	5	76			1	5	5		94	
FEMALE	15	351	7	137	2	33	3	108	3		73	
JOINT (MALE/FEMALE)	28	577	16	325			6	137	6		115	
GENDER NOT AVAILABLE 6/	1	10					1	10				
<b>CENSUS TRACT CHARACTERISTICS 10/</b>												
<b>RACIALETHNIC COMPOSITION 11/</b>												
LESS THAN 10% MINORITY	35	861	17	423	1	20	8	204	9		214	
10-19% MINORITY	6	70	3	28			1	16	2		26	
20-49% MINORITY	14	182	8	87	1	13	2	40	3		42	
50-79% MINORITY												
80-100% MINORITY												
<b>INCOME CHARACTERISTICS 12/ 13/</b>												
<b>LOW INCOME</b>												
MODERATE INCOME	32	529	18	299	2	33	5	83	7		114	
MIDDLE INCOME												
UPPER INCOME	23	584	10	239			6	177	7		168	

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/		PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/								MEAN	MEDIAN
	NO REPORTED PRICING DATA a	REPORTED PRICING DATA x	1.50 - 1.99 a	2.00 - 2.49 a	2.50 - 2.99 a	3.00 - 3.99 a	4.00 - 4.99 x	5.00 - 5.99 x	6 OR MORE a			
<b>BORROWER CHARACTERISTICS</b>												
<b>RACE 5/</b>												
AMERICAN INDIAN/ALASKA NATIVE		1								1	16.20	16.20
ASIAN		1								1	11.84	11.84
BLACK OR AFRICAN AMERICAN												
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND												
WHITE	6	19						1		10	13.10	14.24
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)												
RACE NOT AVAILABLE 6/		1								1	10.44	10.44
<b>ETHNICITY 7/</b>												
HISPANIC OR LATINO		2								2	13.64	13.64
NOT HISPANIC OR LATINO	6	18						1		17	12.77	13.17
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)		1								1	14.34	14.34
ETHNICITY NOT AVAILABLE 6/		1								1	15.87	15.87
<b>MINORITY STATUS 8/</b>												
WHITE NON-HISPANIC	6	16						1		15	12.62	13.17
OTHERS, INCLUDING HISPANIC		5								5	13.93	14.34
<b>INCOME 9/</b>												
LESS THAN 50% OF MSA/MD MEDIAN		10								10	15.02	15.49
50-75% OF MSA/MD MEDIAN	6	9						1		8	10.74	10.86
80-99% OF MSA/MD MEDIAN		2								2	13.17	13.17
100-115% OF MSA/MD MEDIAN												
120% OR MORE OF MSA/MD MEDIAN		1								1	14.24	14.24
INCOME NOT AVAILABLE 6/												
<b>GENDER 19/</b>												
MALE	2	3								3	14.93	15.04
FEMALE	1	6						1		5	11.92	12.95
JOINT (MALE/FEMALE)	3	13								13	13.16	12.11
GENDER NOT AVAILABLE 6/												
<b>CENSUS TRACT CHARACTERISTICS 10/</b>												
<b>RACIALETHNIC COMPOSITION 11/</b>												
LESS THAN 10% MINORITY	6	11						1		10	11.12	10.86
10-15% MINORITY		3								3	15.57	15.63
20-45% MINORITY		8								8	14.79	15.04
50-75% MINORITY												
80-100% MINORITY												
<b>INCOME CHARACTERISTICS 12/ 13/</b>												
LOW INCOME												
MODERATE INCOME												
MIDDLE INCOME	6	12						1		11	14.10	15.04
UPPER INCOME		10								10	11.82	11.07

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BORROWER OR CENSUS TRACT CHARACTERISTICS	15/		PERCENTAGE POINTS ABOVE AVERAGE PRIME OFFER RATE: ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/								MEAN 30/	MEDIAN 31/
	NO REPORTED PRICING DATA \$000's	REPORTED PRICING DATA \$000's	1.50 - 1.99	2.00 - 2.49	2.50 - 2.99	3.00 - 3.99	4.00 - 4.99	5.00 - 5.99	6 OR MORE			
			\$000's	\$000's	\$000's	\$000's	\$000's	\$000's	\$000's			
<b>BORROWER CHARACTERISTICS</b>												
<b>RACE 5/</b>												
AMERICAN INDIAN/ALASKA NATIVE		8								8	16.20	16.20
ASIAN		27								27	11.84	11.84
BLACK OR AFRICAN AMERICAN												
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND												
WHITE	154	319						30		289	11.78	11.90
2 OR MORE MINORITY RACES												
JOINT (WHITE/MINORITY RACE)												
RACE NOT AVAILABLE 6/		30								30	10.44	10.44
<b>ETHNICITY 7/</b>												
HISPANIC OR LATINO		36								36	11.51	10.44
NOT HISPANIC OR LATINO	154	320						30		290	11.54	11.84
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)		21								21	14.34	14.34
ETHNICITY NOT AVAILABLE 6/		7								7	15.87	15.87
<b>MINORITY STATUS 8/</b>												
WHITE NON-HISPANIC	154	285						30		255	11.38	11.27
OTHERS, INCLUDING HISPANIC		92								92	12.66	11.84
<b>INCOME 9/</b>												
LESS THAN 50% OF MSA/MD MEDIAN		127								127	13.83	15.04
50-79% OF MSA/MD MEDIAN	154	219						30		189	10.34	10.86
80-99% OF MSA/MD MEDIAN		34								34	12.98	12.11
100-119% OF MSA/MD MEDIAN												
120% OR MORE OF MSA/MD MEDIAN		4								4	14.24	14.24
INCOME NOT AVAILABLE 6/												
<b>GENDER 19/</b>												
MALE	54	22								22	15.08	15.04
FEMALE	27	110						30		80	10.02	10.86
JOINT (MALE/FEMALE)	73	252								252	12.24	11.84
GENDER NOT AVAILABLE 6/												
<b>CENSUS TRACT CHARACTERISTICS 10/</b>												
<b>RACIALETHNIC COMPOSITION 11/</b>												
LESS THAN 10% MINORITY	154	269						30		239	10.57	10.86
10-19% MINORITY		28								28	15.19	14.93
20-49% MINORITY		87								87	14.38	14.34
50-79% MINORITY												
80-100% MINORITY												
<b>INCOME CHARACTERISTICS 12/ 13/</b>												
LOW INCOME												
MODERATE INCOME												
MIDDLE INCOME	154	145						30		115	12.43	14.34
UPPER INCOME		239								239	11.36	10.86

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MSA/MD: 36780 - OSHKOSH-NEENAH, WI

LOAN TYPE	HOME PURCHASE		REFINANCE		HOME IMPROVEMENT		
	FIRST LIEN	JUNIOR LIEN	FIRST LIEN	JUNIOR LIEN	FIRST LIEN	JUNIOR LIEN	NO LIEN
TOTAL APPLICATIONS 28/							
CONVENTIONAL	1182	30	5421	253	275	174	128
FHA	380		483		11		
VA	90		167		3		
FSA/RHS	23		5				
LOANS ORIGINATED							
CONVENTIONAL	951	22	3755	187	212	122	78
FHA	273		189		5		
VA	66		95		2		
FSA/RHS	17		4				
APPLICATIONS APPROVED BUT NOT ACCEPTED							
CONVENTIONAL	49	2	242	11	11	5	8
FHA	17		18				
VA	1		7				
FSA/RHS	1						
APPLICATIONS DENIED							
CONVENTIONAL	105	3	821	29	37	32	37
FHA	62		134		5		
VA	17		24				
FSA/RHS	2						
APPLICATIONS WITHDRAWN							
CONVENTIONAL	66	3	451	21	12	13	4
FHA	26		119		1		
VA	4		33		1		
FSA/RHS	2		1				
FILES CLOSED FOR INCOMPLETENESS							
CONVENTIONAL	11		152	5	3	2	1
FHA	2		23				
VA	2		8				
FSA/RHS	1						

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LOAN TYPE	MSA/MD: 36780 - OSHKOSH-NEENAH, WI							
	HOME PURCHASE		REFINANCE		HOME IMPROVEMENT			NO LIEN
	FIRST LIEN	JUNIOR LIEN	FIRST LIEN	JUNIOR LIEN	FIRST LIEN	JUNIOR LIEN	NO LIEN	
MEMO ITEM: SUBSET OF LOANS ORIGINATED								
PREAPPROVALS RESULTING IN ORIGINATIONS								
CONVENTIONAL	248	2	NA	NA	NA	NA	NA	NA
FHA	29		NA	NA	NA	NA	NA	NA
VA	13		NA	NA	NA	NA	NA	NA
FSA/RHS	2		NA	NA	NA	NA	NA	NA
LOANS SOLD								
CONVENTIONAL	545		2316	6	67	1		
FHA	245		178		3			
VA	62		83		1			
FSA/RHS	16		4					

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LOAN TYPE	HOME PURCHASE		REFINANCE		HOME IMPROVEMENT		
	FIRST LIEN	JUNIOR LIEN	FIRST LIEN	JUNIOR LIEN	FIRST LIEN	JUNIOR LIEN	NO LIEN
TOTAL APPLICATIONS 28/							
CONVENTIONAL	55		8		2		
FHA	1		1				
VA							
FSA/RHS							
LOANS ORIGINATED							
CONVENTIONAL	28		6				
FHA	1						
VA							
FSA/RHS							
APPLICATIONS APPROVED BUT NOT ACCEPTED							
CONVENTIONAL	2						
FHA							
VA							
FSA/RHS							
APPLICATIONS DENIED							
CONVENTIONAL	11		2		2		
FHA			1				
VA							
FSA/RHS							
APPLICATIONS WITHDRAWN							
CONVENTIONAL	14						
FHA							
VA							
FSA/RHS							
FILES CLOSED FOR INCOMPLETENESS							
CONVENTIONAL							
FHA							
VA							
FSA/RHS							

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MSA/MD: 36780 - OSHKOSH-NEENAH, WI

LOAN TYPE	HOME PURCHASE		REFINANCE		HOME IMPROVEMENT		
	FIRST LIEN	JUNIOR LIEN	FIRST LIEN	JUNIOR LIEN	FIRST LIEN	JUNIOR LIEN	NO LIEN
MEMO ITEM: SUBSET OF LOANS ORIGINATED							
PREAPPROVALS RESULTING IN ORIGINATIONS							
CONVENTIONAL			NA	NA	NA	NA	NA
FHA			NA	NA	NA	NA	NA
VA			NA	NA	NA	NA	NA
FSA/RHS			NA	NA	NA	NA	NA
LOANS SOLD							
CONVENTIONAL				1			
FHA		1					
VA							
FSA/RHS							

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LOAN TYPE	HOME PURCHASE		REFINANCE		HOME IMPROVEMENT		
	FIRST LIEN	JUNIOR LIEN	FIRST LIEN	JUNIOR LIEN	FIRST LIEN	JUNIOR LIEN	NO LIEN
TOTAL APPLICATIONS 28/							
CONVENTIONAL	11	1	20	2	1		
FHA							
VA							
FSA/RHS							
LOANS ORIGINATED							
CONVENTIONAL	9	1	14	2	1		
FHA							
VA							
FSA/RHS							
APPLICATIONS APPROVED BUT NOT ACCEPTED							
CONVENTIONAL			3				
FHA							
VA							
FSA/RHS							
APPLICATIONS DENIED							
CONVENTIONAL			2				
FHA							
VA							
FSA/RHS							
APPLICATIONS WITHDRAWN							
CONVENTIONAL	1		1				
FHA							
VA							
FSA/RHS							
FILES CLOSED FOR INCOMPLETENESS							
CONVENTIONAL	1						
FHA							
VA							
FSA/RHS							
MEMO ITEM: SUBSET OF LOANS ORIGINATED							
LOANS SOLD							
CONVENTIONAL							
FHA							
VA							
FSA/RHS							

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BORROWER OR CENSUS TRACT CHARACTERISTICS	PREAPPROVALS RESULTING IN ORIGINATIONS		PREAPPROVALS APPROVED BUT NOT ACCEPTED 29/		PREAPPROVALS DENIED	
	#	\$000's	#	\$000's	#	\$000's
<b>BORROWER CHARACTERISTICS</b>						
<b>RACE 5/</b>						
AMERICAN INDIAN/ALASKA NATIVE	2	126	NA	NA	NA	NA
ASIAN	4	426	NA	NA	NA	NA
BLACK OR AFRICAN AMERICAN	1	120	NA	NA	NA	NA
NATIVE HAWAIIAN/OTHER PACIFIC ISLAND			NA	NA	NA	NA
WHITE	231	28097	NA	NA	NA	NA
2 OR MORE MINORITY RACES			NA	NA	NA	NA
JOINT (WHITE/MINORITY RACE)			NA	NA	NA	NA
RACE NOT AVAILABLE 5/	10	1816	NA	NA	NA	NA
<b>ETHNICITY 7/</b>						
HISPANIC OR LATINO	3	264	NA	NA	NA	NA
NOT HISPANIC OR LATINO	234	28458	NA	NA	NA	NA
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO)	1	47	NA	NA	NA	NA
ETHNICITY NOT AVAILABLE 6/	10	1816	NA	NA	NA	NA
<b>MINORITY STATUS 8/</b>						
WHITE NON-HISPANIC	227	27786	NA	NA	NA	NA
OTHERS, INCLUDING HISPANIC	11	983	NA	NA	NA	NA
<b>INCOME 9/</b>						
LESS THAN 50% OF MSA/MD MEDIAN	34	2475	NA	NA	NA	NA
50-79% OF MSA/MD MEDIAN	71	6267	NA	NA	NA	NA
80-99% OF MSA/MD MEDIAN	32	3312	NA	NA	NA	NA
100-119% OF MSA/MD MEDIAN	23	2797	NA	NA	NA	NA
120% OR MORE OF MSA/MD MEDIAN	82	15001	NA	NA	NA	NA
INCOME NOT AVAILABLE 6/	6	733	NA	NA	NA	NA
<b>GENDER 19/</b>						
MALE	58	6311	NA	NA	NA	NA
FEMALE	47	4444	NA	NA	NA	NA
JOINT (MALE/FEMALE)	137	18908	NA	NA	NA	NA
GENDER NOT AVAILABLE 6/	6	922	NA	NA	NA	NA
<b>CENSUS TRACT CHARACTERISTICS 10/</b>						
<b>RACIALETHNIC COMPOSITION 11/</b>						
LESS THAN 10% MINORITY	229	28322	NA	NA	NA	NA
10-19% MINORITY	16	1545	NA	NA	NA	NA
20-49% MINORITY	3	718	NA	NA	NA	NA
50-79% MINORITY			NA	NA	NA	NA
80-100% MINORITY			NA	NA	NA	NA
<b>INCOME CHARACTERISTICS 12/ 13/</b>						
LOW INCOME			NA	NA	NA	NA
MODERATE INCOME	5	349	NA	NA	NA	NA
MIDDLE INCOME	179	20011	NA	NA	NA	NA
UPPER INCOME	64	10225	NA	NA	NA	NA

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MSA/MD: 36790 - OSHKOSH-NEENAH, WI

PRICING INFORMATION	HOME PURCHASE		REFINANCE		HOME IMPROVEMENT		
	FIRST LIEN	JUNIOR LIEN	FIRST LIEN	JUNIOR LIEN	FIRST LIEN	JUNIOR LIEN	NO LIEN
1- TO 4-FAMILY OWNER OCCUPIED DWELLINGS (EXCLUDES MANUFACTURED HOMES)							
<b>INCIDENCE OF PRICING</b>							
NO PRICING REPORTED 15/	767	17	3499	158	192	113	NA
PRICING REPORTED	16	4	48	23	5	6	NA
MEAN (POINTS ABOVE AVERAGE PRIME OFFER RATE; ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/)	2.15	4.92	2.50	5.10	2.10	5.84	NA
MEDIAN (POINTS ABOVE AVERAGE PRIME OFFER RATE; ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/)	1.96	5.06	1.90	4.72	1.88	5.23	NA
<b>HOEPA STATUS</b>							
HOEPA LOAN 17/	NA	NA	3	3		1	NA
NOT HOEPA LOAN	NA	NA	3544	178	197	118	NA
MANUFACTURED HOME OWNER OCCUPIED DWELLINGS							
<b>INCIDENCE OF PRICING</b>							
NO PRICING REPORTED 15/	6		5				NA
PRICING REPORTED	22		1				NA
MEAN (POINTS ABOVE AVERAGE PRIME OFFER RATE; ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/)	13.06		5.88				NA
MEDIAN (POINTS ABOVE AVERAGE PRIME OFFER RATE; ONLY INCLUDES LOANS WITH APR ABOVE THE THRESHOLD 16/)	14.24		5.88				NA
<b>HOEPA STATUS</b>							
HOEPA LOAN 17/	NA	NA					NA
NOT HOEPA LOAN	NA	NA	6				NA

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Grantee SF-424's and Certification(s)

**Application for Federal Assistance SF-424**

16. Congressional Districts Of:  
 \* a. Applicant: [Redacted] \* b. Program/Project: [Redacted]

Attach an additional list of Program/Project Congressional Districts if needed.  
 [Redacted] [Redacted] [Redacted]

17. Proposed Project:  
 \* a. Start Date: [Redacted] \* b. End Date: [Redacted]

18. Estimated Funding (\$):

* a. Federal	[Redacted]
* b. Applicant	[Redacted]
* c. State	[Redacted]
* d. Local	[Redacted]
* e. Other	[Redacted]
* f. Program Income	[Redacted]
* g. TOTAL	[Redacted]

19. Is this application subject to review by State Under Executive Order 12372 Process?  
 a. This application was made available to the State under the Executive Order 12372 Process for review on [Redacted].  
 b. Program is subject to E.O. 12372 but has not been selected by the State for review.  
 c. Program is not covered by E.O. 12372.

20. Is this application being paid out any Federal Debt? (If "Yes," provide explanation in attachment)  
 Yes  No  
 If "Yes", provide explanation and attach:  
 [Redacted] [Redacted] [Redacted]

21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 1001)  
 I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: [Redacted] \* First Name: [Redacted]  
 Middle Name: [Redacted]  
 \* Last Name: [Redacted]  
 Suffix: [Redacted]

\* Title: [Redacted]

\* Telephone Number: [Redacted] \* Fax Number: [Redacted]

\* Email: [Redacted]

\* Signature of Authorized Representative: [Redacted] \* Date Signed: [Redacted]

Application for Federal Assistance SF-424		
<b>* 1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		
<b>* 2. Type of Application:</b> * If Revision, advise appropriate choice(s) <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision * Other (Specify):		
<b>* 3. Date Received:</b>		<b>4. Applicant Identifier:</b>
<b>aa. Federal Entity Identifier:</b> HHS-HQ-55-0307		<b>bb. Federal Award Identifier:</b>
<b>State Use Only:</b> <b>6. Date Received by State:</b> <b>7. State Application Identifier:</b>		
<b>8. APPLICANT INFORMATION:</b>		
<b>* a. Legal Name:</b> City of Oshtemo		
<b>* a. Employer/Taxpayer Identification Number (EIN/TIN):</b> 59-6085763		<b>* c. Organizational DUNS:</b> 049329090000
<b>d. Address:</b>		
<b>* Street:</b> 225 South Avenue <b>Street2:</b> PO Box 1130 <b>* City:</b> <b>County/Parish:</b> Calhoun <b>* State:</b> MI <b>Province:</b> <b>* Country:</b> USA: UNITED STATES <b>* Zip / Postal Code:</b> 48862		
<b>e. Organizational Unit:</b>		
<b>Department Name:</b> Community Development		<b>Division Name:</b> Economic Development
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>		
<b>Prefix:</b>	<b>* First Name:</b> Debra	
<b>Middle Name:</b>		
<b>* Last Name:</b> Brandt		
<b>Suffix:</b>		
<b>Title:</b> Grants Coordinator		
<b>Organizational Address:</b>		
<b>City of Oshtemo</b>		
<b>* Telephone Number:</b> 520-235-2825		<b>Fax Number:</b>
<b>* Email:</b> dbbrandt@cityofoshtemo.com		

**Application for Federal Assistance SF-424**

\* 9. Type of Applicant 1: Select Applicant Type:

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

\* 10. Name of Federal Agency:

11. Catalog of Federal Domestic Assistance Number:  
  
 CDA Title:

\* 12. Funding Opportunity Number:

\* Title:

13. Competition Identification Number:  
  
 Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

\* 15. Descriptive Title of Applicant's Project:

Attach supporting documents as specified in agency instructions.

## CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;

2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and

3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.

  
Signature of Authorized Official

5/30/2019  
Date

Mark A. Rohloff  
Title City Manager

### Specific Community Development Block Grant Certifications

The Fundament Community certifies that:

**Citizen Participation** -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan** -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

**Following a Plan** -- It is following a current consolidated plan that has been approved by HUD.

**Use of Funds** -- It has complied with the following criteria:

1. **Maximum Feasible Priority.** With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. **Overall Benefit.** The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2019 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. **Special Assessments.** It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

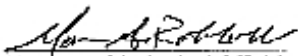
**Excessive Force** -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

**Compliance with Anti-discrimination laws** -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

**Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, I, K and R.

**Compliance with Laws** -- It will comply with applicable laws.

  
Signature of Authorized Official  
Mark A. Rohloff  
City Manager  
Title

5/30/2019  
Date



**OPTIONAL Community Development Block Grant Certification**

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(e):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

\_\_\_\_\_  
Signature of Authorized Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title

**Specific HOME Certifications**

The HOME participating jurisdiction certifies that:

**Tenant-Based Rental Assistance** -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

**Eligible Activities and Costs** -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

**Subsidy layering** -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing.

\_\_\_\_\_  
Signature of Authorized Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title

## **Emergency Solutions Grants Certifications**

The Emergency Solutions Grants Program recipient certifies that:

**Major rehabilitation/conversion/renovation** – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

**Essential Services and Operating Costs** – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

**Renovation** – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

**Supportive Services** – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for these individuals.

**Matching Funds** – The recipient will obtain matching amounts required under 24 CFR 576.201.

**Confidentiality** – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

**Homeless Persons Involvement** – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

**Consolidated Plan** – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

**Discharge Policy** -- The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

\_\_\_\_\_  
Signature of Authorized Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title

**Housing Opportunities for Persons With AIDS Certifications**

The HOPWA grantee certifies that:

**Activities** – Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

**Building** -- Any building or structure assisted under that program shall be operated for the purpose specified in the consolidated plan:

1. For a period of not less than 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For a period of not less than 5 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure,

\_\_\_\_\_  
Signature of Authorized Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title

**APPENDIX TO CERTIFICATIONS**

**INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:**

**Lobbying Certification**

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4340-0039  
 Expiration Date: 01/31/2019

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (2348-3242), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:


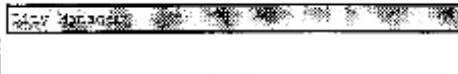


1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to assure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without commission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4729-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OMB's Standards for a Merit System of Personnel Administration (5 C.F.R. 920, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§1811 et seq.) which prohibits the use of lead based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicap; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-253), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 and 290a-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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 Prescribed by OMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1509 and 7324-7326) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276n-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11732; (c) protection of wetlands pursuant to EO 11690; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-203).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1986, as amended (16 U.S.C. §470), EO 11593 (Identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1986 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 108(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7105) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subaward under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	
APPLICANT ORGANIZATION	DATE SUBMITTED
	

SF-424D (Rev. 7-97) Back



**ASSURANCES - NON-CONSTRUCTION PROGRAMS**

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0340-0040), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:


1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 10 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 86-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (20 U.S.C. §794), which prohibits discrimination on the basis of handicap; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-265), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1944 (42 U.S.C. §§290 ca-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental, or financing of housing; (i) any other nondiscrimination provisions in the applicable statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or Federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

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Prescribed by OMB Circular A-102

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-335), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of wetland facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11890; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in ensuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470; EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 90-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm-blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) or 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Frustrating a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	City Manager
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Odessa	01/20/2018

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