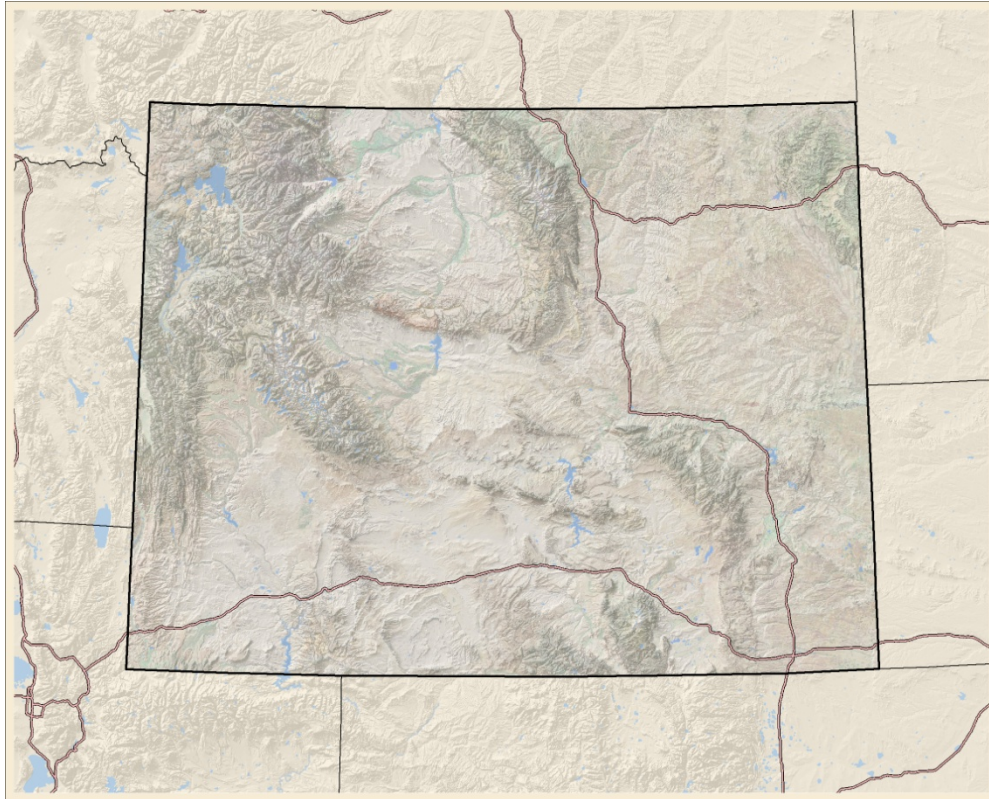


2011 WYOMING ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE



REVISED FINAL REPORT

OCTOBER 5, 2012

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Prepared for
The Wyoming Community Development Authority
and
The Wyoming Business Council

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HAS YOUR RIGHT TO FAIR HOUSING BEEN VIOLATED?

If you feel you have experienced discrimination in the housing industry, please contact:

U.S. Department of Housing and Urban Development
Casper Field Office
150 East B Street
Room 1010
Casper, WY 82601-1969
(307) 261-6250

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EXECUTIVE SUMMARY

AI PURPOSE AND PROCESS

In exchange for receiving federal funds, entitlement jurisdictions are required to submit certification of affirmatively furthering fair housing to the U.S. Department of Housing and Urban Development (HUD). This certification has three elements:

1. Complete an Analysis of Impediments to Fair Housing Choice (AI);
2. Take actions to overcome the effects of any impediments identified; and
3. Maintain records reflecting the actions taken in response to the analysis.

In the *Fair Housing Planning Guide*, page 2-6, HUD provides a definition of impediments to fair housing choice as:

- “Actions omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices
- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.”

The list of protected classes included in the above definition is drawn from the federal Fair Housing Act, which was first enacted in 1968. However, state or local government may enact fair housing laws that extend protection to other groups, and the AI is expected to address housing choice for these additional protected classes as well.

The AI process involves a thorough examination of a variety of sources related to housing, affirmatively furthering fair housing, the fair housing delivery system and housing transactions, particularly for persons who are protected under fair housing law.

The development of an AI also includes a public input and review process via direct contact with stakeholders, public meetings to collect input from citizens and interested parties, distribution of draft reports for citizen review, and formal presentations of findings and impediments along with recommended actions to overcome or lessen the affects of the identified impediments.

METHODOLOGY

The Wyoming Community Development Authority and the Wyoming Business Council receive funding from HUD on behalf of the non-entitlement areas of the state. As part of the Consolidated Planning process and as a requirement for receiving HUD formula grant funding, this AI evaluated impediments to fair housing choice within the remainder of the State of Wyoming, defined as the balance of the state when the entitlement areas of Casper and Cheyenne are excluded. Within the State of Wyoming, fair housing law is covered by the

federal Fair Housing Act, which offers the protections of race, color, religion, national origin, sex, disability and familial status. The State of Wyoming has no unique fair housing law. As such, fair housing choice was addressed in the state in relation to the federally protected classes.

The AI was conducted through analysis of a variety of both quantitative and qualitative sources. Quantitative sources utilized for examination of fair housing choice within the State of Wyoming included:

- Socio-economic and housing data from the U.S. Census Bureau,
- Employment data from the U.S. Bureau of Labor Statistics,
- Economic data from the U.S. Bureau of Economic Analysis,
- Home purchase data from the Home Mortgage Disclosure Act,
- Housing complaint data from the U.S. Department of Housing and Urban Development.

Qualitative research included evaluation of other relevant existing fair housing research as well as fair housing law cases relevant to the State of Wyoming. Additionally, qualitative research was involved in the evaluation of information gathered from several public input opportunities and other stakeholder and citizen outreach activities conducted in relation to the AI including:

- An online survey of nearly 440 stakeholders throughout the state to investigate fair housing issues in the private and public sectors,
- A planning and zoning survey to identify possible barriers to fair housing choice in established zoning and land use decisions in the non-entitlement communities of the state,
- Fair housing forums to allow public input and reaction to preliminary findings of the AI.

Research conclusions were drawn from these sources and were further evaluated based on HUD's definition of impediments to fair housing choice, as presented on the previous page. Ultimately, a list of impediments to fair housing choice in existence within the State of Wyoming was identified along with actions that could be implemented to overcome or ameliorate the identified impediments.

OVERVIEW OF FINDINGS

Socio-Economic Context

According to the U.S. Census Bureau, between 2000 and 2010 the population in the State of Wyoming increased substantially from 493,782 to 563,626 persons or by 14.1 percent. American Community Survey (ACS) data for population by age representing a 2005 to 2009 average, show that most persons in the state were between the ages of 35 and 54, but a significant number of persons also fell in the age group of 25 to 34. Similar patterns in age distribution were seen in the two entitlement cities of Casper and Cheyenne and in the remainder of the state.

In terms of race, the white population in the state grew by the largest total amount of persons but fell in total share of population between 2000 and 2010 from 92.1 percent to 90.7 percent. All other racial groups showed small gains in population of less than 0.5 percent each. However, the Hispanic population grew from 6.4 percent of the population in 2000 to 8.9 percent of the population in 2010. The remainder of the state showed a 2.5 percent increase in the Hispanic population from 2000 to 2010, while Casper and Cheyenne both showed an increase of 2.0 percent. Some racial and ethnic populations were geographically concentrated in certain areas of the state, specifically near cities such as Jackson, Green River, and Rawlins, where a few census tracts showed more than 25.0 percent of the population as Hispanic. Comparison of 2000 and 2010 maps showed that some of these concentrations may be increasing over time.

At the time of the 2000 census, the state had a disability rate of 17.1 percent, which was slightly lower than the 19.0 percent national rate at that time. The remainder of the state was found to have a slightly smaller share of the disabled population as compared to Cheyenne and Casper, and the disabled population was somewhat concentrated in a few areas of the non-entitlement areas of the state, such as near the City of Torrington.

Data from the Bureau of Labor Statistics demonstrated that the labor force in Wyoming, defined as people either working or looking for work, fell only slightly from 296,880 persons to 293,769 persons between 2008 and 2009, but total employment figures dropped from 277,669 persons to 273,313 persons. As a result of increasing labor force and decreasing employment figures, the unemployment rate increased to 6.4 percent by the end of 2010. Unemployment rates were similar in the entitlement cities in the state. Data from the Bureau of Economic Analysis showed that average earnings per job in Wyoming have been stronger than national figures with the state average almost \$5,000 greater than the national average in 2009.

In Wyoming, the average poverty rate for 2005 through 2009 was 9.6 percent with nearly 50,000 persons considered to be living in poverty. Poverty rates were found to be similar across the entitlement cities and the remainder of Wyoming, although some census tracts with disproportionate shares of the disabled population were found near Lander and Laramie.

The number of housing units in the State of Wyoming increased by 17.0 percent between 2000 and 2010. Of the 223,854 housing units reported in the 2000 census, about 68.5 percent were single-family units, and more recent data from the ACS showed that this percentage held steady. A smaller share of single-family units and a larger share of mobile homes were found in the remainder of the state as compared to the entitlement cities. A total of 193,609 units in the state at the time of the 2000 census were occupied housing units, and, of these, 70.0 percent were owner-occupied and 30.0 percent were renter-occupied. Of the unoccupied housing units counted in the state in 2000, 5,081 were noted to be "other vacant" units that are not available to the marketplace and can contribute to blighting influences; more recent data show that the percentage of this type of vacant unit is increasing in the state.

At the time that the 2000 census was taken, 1.8 percent of households in Wyoming were overcrowded and another 0.9 percent of households were severely overcrowded, but 2009 five-year ACS data show that the statewide percentage of units with this housing problem may

be decreasing. However, the remainder of the state generally showed higher levels of crowding and severe overcrowding than Casper or Cheyenne for both renter and owner households. In Wyoming, 1.9 and 2.2 percent of all households were lacking complete plumbing or kitchen facilities, respectively, at the time of the 2000 census but this housing problem was shown to have worsened in more recent data in both the entitlement and non-entitlement areas of the state. Additionally, in 2000 12.9 percent of households had a cost burden and 8.0 percent of households had a severe cost burden, but the 2009 ACS data showed that both of these percentages increased since that time, but this was especially true for homeowners with a mortgage. Similar findings were seen for Casper, Cheyenne and the remainder of Wyoming, and in some cases the increase in share of renters or homeowners with a cost burden or severe cost burden was substantial.

Evaluation of the Fair Housing Profile

A review of the fair housing profile in the State of Wyoming revealed that the U.S. Department of Housing and Urban Development (HUD), with a regional office in Denver and a field office in Casper, offers fair housing services in Wyoming including complaint and compliance review. Examination of both national fair housing studies and cases supported the idea that while housing discrimination activity may have declined in recent years, fair housing discrimination continues to most commonly affect disabled persons and racial and ethnic minorities.

Fair Housing in the Private Sector

Home Mortgage Disclosure Act (HMDA) data were used to analyze differences in denial rates in the state by race, ethnicity, gender, income and census tract. Evaluated home purchase loan applications from 2004 through 2009 showed that there were 50,895 home purchase loan originations and 10,848 loan denials, for an average six-year loan denial rate of 17.6 percent. However, denial rates in Cheyenne and Casper were considerably lower than the remainder of the state at 9.8 and 12.8 percent, respectively, compared to 20.6 percent in the remainder of the state. These HMDA data also showed that American Indian, black and Hispanic applicants experienced significantly higher rates of loan denials than white or Asian applicants, even after correcting for income. The same pattern was found of higher denial rates for minority racial and ethnic groups in the remainder of the state and lower denial rates in the entitlement cities. For example, American Indians experienced a denial rate of 40.5 percent in the remainder of the state, but this group experienced denial rates of 17.8 percent in Cheyenne and 17.4 percent in Casper. Further, these highly denied racial and ethnic groups appear to have been disproportionately impacted in some geographic areas of the remainder of the state where denial rates at times exceeded 75.0 percent.

Analysis of originated loans was also performed to examine the frequency of high annual percentage rate loans (HALs). HALs represent lower quality, higher cost loans, and data showed that American Indian, black and Hispanic populations were also disproportionately impacted by a higher share of these potentially predatory loans. Subsequently, these groups may face a greater burden of foreclosure. Furthermore, loan data in Casper, Cheyenne and the

remainder of the state showed that minority applicants in the non-entitlement areas of the state were more likely to procure a higher portion of these riskier loans.

Fair housing complaint data were collected from HUD, and data from this source showed that less than 80 complaints were filed in the state from 2005 through 2010 with 15 counted in Casper, 15 in Cheyenne, and 47 in the remainder of the state. The protected classes appearing to be disproportionately impacted by discrimination in rental markets included persons with mental or physical disabilities as well as persons of Native American race and Hispanic ethnicity. The most frequent discriminatory issues were found in the rental market and were noted to include discriminatory refusal to rent, failure to make reasonable accommodation, discrimination in terms, conditions and privileges in relation to rental, and discriminatory advertisements, notices or statements. Complaint data in the non-entitlement areas of the state aligned roughly with the trends found in the overall statewide complaint data.

A review of housing advertisements posted on the Craigslist website for the State of Wyoming from one week at the end of March and beginning of April 2011 revealed that there were few issues of preferential language or possible discriminatory advertising of rental housing.

Results from a fair housing survey that was conducted as part of the AI process showed that many respondents saw possible issues of housing discrimination in Wyoming's private housing sector including refusal to rent and failure to make reasonable accommodations in the rental market as well as failure to provide fair lending practices in the home mortgage market. Additional issues included refusal to show properties in the home purchase market as well as failure to construct housing that meets disability requirements. Comments received from the survey demonstrated some misunderstanding of impediments to fair housing choice in relation to HUD's definition of impediments as actions, omissions or decisions that restrict housing choice due to protected class status.

Fair Housing in the Public Sector

The status of affirmatively fair housing within Wyoming's public fair housing sector was primarily evaluated through the use of two surveys: a fair housing survey and a survey of zoning and land use policies and practices.

Analysis of comments received in the fair housing survey showed that there are possible issues of resistance to development of housing for special needs populations, possible discriminatory zoning ordinances, and restrictive occupancy standards.

Results of responses to the non-entitlement community survey showed that while several local governments throughout the state have made strides to resolve public policies or practices that may represent barriers to fair housing choice, some residual issues remain in relation to unclear definitions of "disability" or "family" as well as ambiguous or questionable language in occupancy or development standards.

Public Input

Public input opportunities were an intrinsic part of the development of this AI. Activities included a fair housing survey to evaluate current fair housing efforts and fair housing forums wherein citizens were offered the chance to comment on initial findings of the AI and offer feedback on prospective impediments.

Results of the fair housing survey, which was completed by 436 persons in the state, showed that most respondents feel that fair housing laws are useful and that they are not difficult to understand or follow. Slightly more than 90.0 percent of respondents said that they were aware of fair housing training and 87.0 percent of respondents said that they had taken part in some kind of fair housing training, which suggests that education opportunities are available and utilized. However, respondents showed some unfamiliarity with the classes of persons protected by federal fair housing laws as well as where to refer someone with a housing complaint. Many respondents also did not seem to be aware of fair housing testing activities.

A fair housing forum held in April in Cheyenne allowed citizens to voice concerns about barriers to fair housing choice. Comments from these sessions indicated problems of a lack of accessibility in the fair housing complaint system as well as denial of housing opportunities for American Indians living on trust lands. Further, a presentation of the public review draft of the report was held in latter June to afford the public additional opportunities to provide prospective and commentary on the AI.

IDENTIFIED IMPEDIMENTS TO FAIR HOUSING CHOICE AND SUGGESTED ACTIONS

The 2011 AI for the State of Wyoming identified several issues that the State may want to investigate further as impediments to fair housing choice. These issues are presented below and are followed by appropriate actions that the State may wish to implement in order to alleviate or eliminate these impediments and offer greater housing choice for protected classes and all citizens of Wyoming.

Impediments to Fair Housing Choice

Private Sector

1. Denial of available housing units in the rental markets
2. Discriminatory refusal to rent
3. Discriminatory terms, conditions or privileges relating to rental
4. Failure to make reasonable accommodations or modifications
5. Preferences stated in advertisements for rental housing
6. Denial of availability of housing in the home purchase markets
7. Denial of home purchase loans
8. Occurrence of predatory lending activities in the home purchase market
9. Denial of loans specifically for homes within tribal trust lands
10. Steering in the real estate markets
11. Failure to comply with accessibility requirements in construction of housing units

Public Sector

1. Unsuccessful past efforts to enact statewide fair housing law
2. Ineffective enforcement of fair housing laws due to lack of fair housing infrastructure
3. Limited access to fair housing services due to lack of local Fair Housing Initiative Program recipient or state enforcement agency
4. Historical establishment of policies and practices resulting in segregation of minority populations
5. Insufficient establishment and enforcement of building codes regarding special needs housing
6. Decisions regarding definitions of “family,” “dwelling units” and related terms made by cities within the state are inequitable
7. Resistance or Not In My Backyard (NIMBY) sentiment toward development of special needs housing

Impediments Matrix

A matrix was used to more closely detail the source or sources from which the impediments were derived. Table 1, on the following page, lists the impediments, by private and public sector, and demonstrates which sources supported the issue as an impediment to fair housing choice within the non-entitlement areas of Wyoming. The protected classes most often noted to be cited in relation to the impediment have been included as well. Furthermore, the matrix includes a ranking code with “H” indicating a high need for action, “M” indicating a moderate need for action, and “L” indicating a low need for action.

**Table 1
Impediments Matrix**

2011 Wyoming Analysis of Impediments

Impediment	Source									Protected Classes Most Affected	Action Ranking	
	Census Data	Review of Fair Housing Profile	Literature/Case Review	HMDA Data	HUD Housing Complaint Review	Advertisement Analysis	Fair Housing Survey	Non-Entitlement Community Survey	Fair Housing Forums			Other
Private Sector												
Denial of available housing in the rental markets					X		X				Disability, race, national origin, gender, religion, familial status	H
Discriminatory refusal to rent					X		X				Disability, race, national origin, familial status, sex	H
Discriminatory terms, conditions or privileges relating to rental					X						Disability, race, national origin	H
Failure to make reasonable accommodation or modification					X		X				Disability, race, national origin	H
Preferences stated in advertisements					X		X				Disability, race, national origin, familial status	M
Denial of availability of housing in the home purchase market							X				Disability, race, national origin	H
Denial of home purchase loans				X			X		X		Race, national origin, sex, disability	M
Occurrence of predatory lending activities in the home purchase market				X					X		Race, national origin	H
Denial of loans specifically for homes within tribal trust lands									X		Race	M
Steering in the real estate markets							X				Race, national origin	M
Failure to comply with accessibility requirements in construction of housing units							X				Disability	M
Public Sector												
Unsuccessful past efforts to enact statewide fair housing law		X					X				All	M
Ineffective enforcement of fair housing laws due to lack of fair housing infrastructure					X		X		X		All	H
Limited access to fair housing services due to lack of Fair Housing Initiative Program recipient or state enforcement agency							X		X		All	H
Historical establishment of policies and practices resulting in segregation of minority populations	X		X						X		Race, national origin, disability	L
Insufficient establishment and enforcement of building codes regarding special needs housing							X	X			Disability	M
Decisions made regarding definitions of "family," "dwelling unit," and related terms made by cities within the state are inequitable							X	X			Familial status, disability	L
Resistance or Not In My Backyard (NIMBY) sentiment toward development of special needs housing							X				Disability	M

Suggested Actions to Resolve or Ameliorate Impediments

Private Sector

1. Impediment: Denial of available housing units in the rental markets
Suggested Actions: Research need for testing activities; research need for enforcement activities; raise awareness and educate landlords and property management companies in fair housing law; raise awareness and educate housing consumers in fair housing rights
2. Impediment: Discriminatory refusal to rent
Suggested Actions: Research need for testing activities; research need for enforcement activities; raise awareness and educate landlords and property management companies in fair housing law; raise awareness and educate housing consumers in fair housing rights
3. Impediment: Discriminatory terms, conditions or privileges relating to rental
Suggested Actions: Research need for testing activities; research need for enforcement activities; raise awareness and educate landlords and property management companies in fair housing law; raise awareness and educate housing consumers in fair housing rights
4. Impediment: Failure to make reasonable accommodations or modifications
Suggested Actions: Research need for testing activities; research need for enforcement activities; hold training sessions to raise awareness and educate housing providers in requirements regarding reasonable accommodation or modification
5. Impediment: Preferences stated in advertisements for rental housing
Suggested Actions: Raise awareness and educate landlords and property management companies in fair housing law
6. Impediment: Denial of availability of housing in the home purchase markets
Suggested Actions: Research need for testing activities, research need for enforcement activities; raise awareness and educate property sellers, real estate brokers, and real estate agents in fair housing law; raise awareness and educate housing consumers in fair housing rights
7. Impediment: Denial of home purchase loans
Suggested Actions: Determine the location and intensity of discriminatory lending; raise awareness and educate buyers through enhanced home purchase and credit education
8. Impediment: Occurrence of predatory lending activities in the home purchase market

- Suggested Actions: Determine the scope of the problem; raise awareness and educate buyers through enhanced home purchase and credit education
9. Impediment: Denial of loans specifically for homes within tribal trust lands
Suggested Actions: Research reasons for denial of loans within tribal trust lands
 10. Impediment: Steering in the real estate markets
Suggested Actions: Research need for testing activities; communicate this problem to the Wyoming Real Estate Commission; continue to offer outreach, education and awareness activities for real estate agents; identify fair housing education classes and availability of classes for real estate agents
 11. Impediment: Failure to comply with accessibility requirements in construction of housing units
Suggested Actions: Determine the scope of the problem as to whether accessibility requirements are being met in the construction or rehabilitation of housing units; determine how accessibility requirements are being monitored in market rate, non-assisted residential construction projects; research possible outlets for education and awareness opportunities or architects and builders; research sources of funding for rehabilitation of housing units to meet accessibility needs

Public Sector

1. Impediment: Unsuccessful past efforts to enact statewide fair housing law
Suggested Actions: Examine reasons for past failure of fair housing law; determine need for state fair housing law
2. Impediment: Ineffective enforcement of fair housing laws due to lack of state fair housing infrastructure
Suggested Actions: Research feasibility of establishing agency as Fair Housing Assistance Program (FHAP) grant recipient or Fair Housing Initiative Program (FHIP) grant recipient to serve Wyoming
3. Impediment: Limited access to fair housing services due to lack of local Fair Housing Initiative Program recipient or state enforcement agency
Suggested Actions: If FHAP or FHIP agency is established, increase and advertise available complaint venues; raise awareness and educate public on how to file a fair housing complaint with HUD
4. Impediment: Historical establishment of policies and practices resulting in segregation of minority populations
Suggested Actions: Continue to review questionable land use and planning policies and practices in remaining Wyoming communities; conduct outreach, education and awareness activities in the identified communities; encourage appropriate revisions; document changes

5. Impediment: Insufficient establishment and enforcement of building codes regarding special needs housing
Suggested Actions: Encourage local communities to evaluate building codes and revise as needed; document local community progress
6. Impediment: Decisions regarding definitions of “family,” “dwelling units” and related terms made by communities within the state
Suggested Actions: Continue to encourage local communities to reevaluate definitions that may restrict access to housing; provide education and awareness opportunities to communities that may not be in compliance
7. Impediment: Resistance or Not In My Backyard (NIMBY) sentiment toward development of special needs housing
Suggested Actions: Encourage planning decisions that work to decrease segregation and increase integration of these populations; document progress toward these goals

SECTION I. INTRODUCTION

BACKGROUND AND PURPOSE

Title VIII of the 1968 Civil Rights Act, also known as the federal Fair Housing Act, made it illegal to discriminate in the buying, selling or leasing of housing because of a person's race, color, religion or national origin. Sex was added as a protected class in the 1970s. In 1988, the Fair Housing Amendments Act added familial status and disability to the list, making a total of seven federally protected classes. Federal fair housing statutes are largely covered by the following three pieces of U.S. legislation:

- The Fair Housing Act,
- The Housing Amendments Act, and
- The Americans with Disabilities Act.

Provisions to affirmatively furthering fair housing are long-standing components of the U.S. Department of Housing and Urban Development's (HUD) housing and community development programs. These provisions flow from Section 808(e) (5) of the Federal Fair Housing Act, which requires that the Secretary of HUD administer HUD's housing and urban development programs in a manner that affirmatively furthers fair housing.

In 1994, HUD published a rule consolidating plans for housing and community development programs into the *Consolidated Plan for Housing and Community Development*. This document grouped the plans for original consolidated programs including Community Development Block Grants (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants¹ (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) with additional program components that have been enacted.

As a part of the consolidated planning process, states and entitlement communities receiving such funds as a formula allocation directly from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing. This certification has three parts:

- Complete an Analysis of Impediments to Fair Housing Choice (AI);
- Take actions to overcome the effects of any impediments identified through the analysis; and
- Maintain records reflecting the analysis and actions taken.

In the *Fair Housing Planning Guide*, page 2-6, HUD notes that "Impediments to fair housing choice are:

- Actions omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices

¹ The Emergency Shelter Grant was recently renamed the Emergency Solutions Grant.

- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.”

HUD describes impediments to fair housing choice in terms of their applicability to local, state and federal law, and state or local government may enact fair housing laws or ordinances that extend protection to other groups. However, the State of Wyoming does not have a fair housing law, so only federal fair housing laws apply.

According to HUD, the AI and certification of affirmatively furthering fair housing should involve:

- Analyzing and working to eliminate housing discrimination in the jurisdiction;
- Promoting fair housing choice for all people;
- Providing opportunities for racially and ethnically inclusive patterns of housing occupancy;
- Promoting housing that is physically accessible to, and usable by, all people, particularly individuals with disabilities; and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.²

Thus, the objective of the 2011 Wyoming AI is to research, analyze and identify prospective impediments to fair housing choice in the State of Wyoming and to suggest actions that the State can consider in working toward eliminating or ameliorating the identified impediments.

GEOGRAPHIC SCOPE OF THE PROJECT

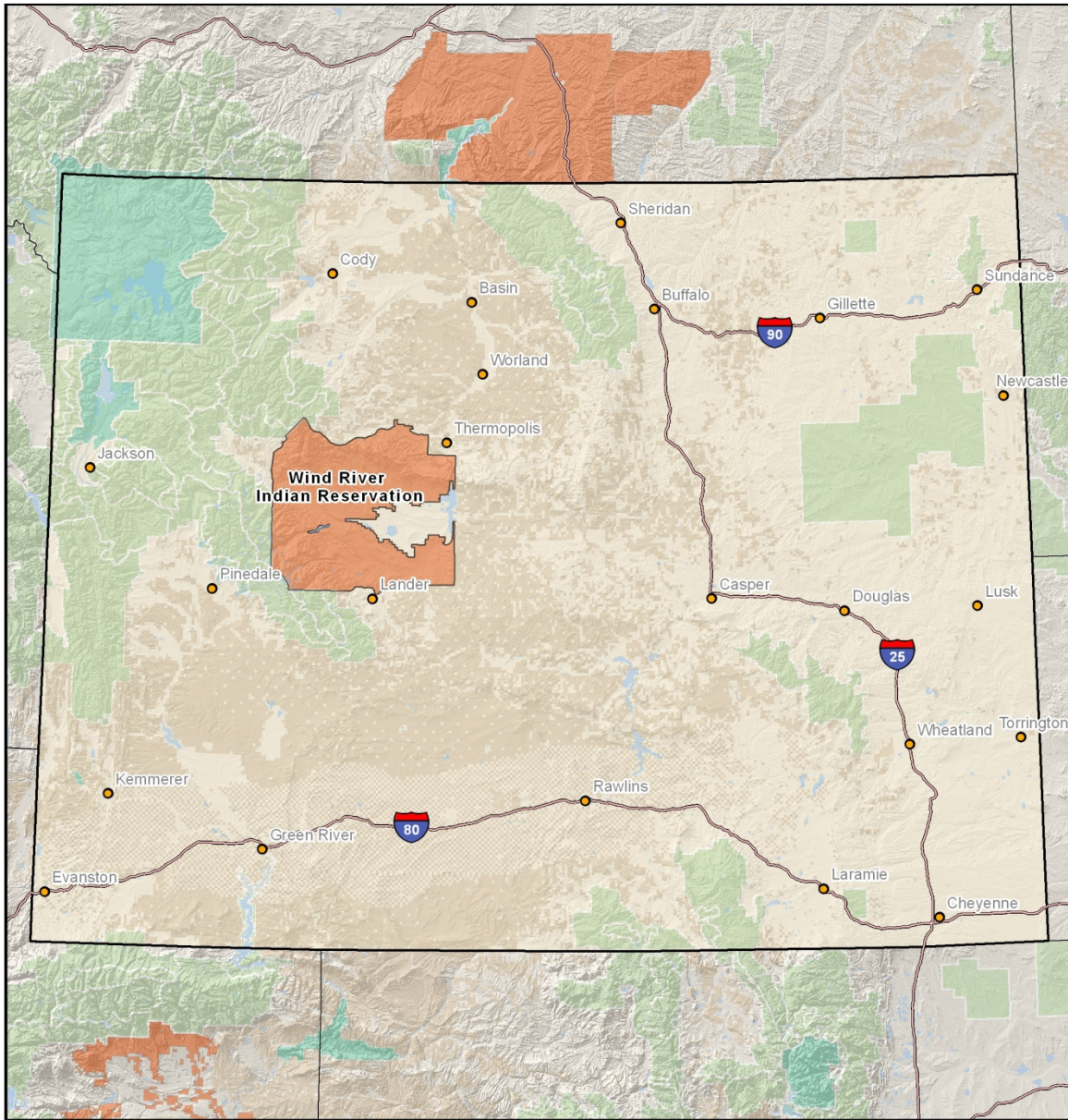
While this report serves as the AI for the State of Wyoming, much of the information presented in this document has been separated into three geographic sections within the state: Casper, Cheyenne, and the remainder of Wyoming. In the State of Wyoming, Casper and Cheyenne receive funding from HUD separately from the State as entitlement cities and are required to prepare their own Consolidated Plans and AIs. Many sets of data included in this report present information for the state in its entirety as well as for the remainder of the state to be used for both State agency operations and Casper and Cheyenne city operations and planning.

A map of the State of Wyoming, including the locations of the entitlement cities of Casper and Cheyenne as well as the location of the Wind River Reservation and federal and state lands, is presented on the following page.³

² *Fair Housing Planning Guide*. U.S. Department of Housing and Urban Development. March 1996, pg.1-3.

³ Housing resources received by the Wind River Indian Reservation from HUD are guided by a separate set of administrative policies outside of the Consolidated Plan. These guidelines are derived from the Native American Housing Assistance and Self Determination Act (NAHSDA) of 1996. Consequently, the State is not responsible for fair housing planning in the Wind River Indian Reservation but may contribute to that dialogue.

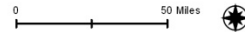
Map I.1 State of Wyoming



LEGEND

- USA Federal Lands**
- Forest Service
 - Bureau of Land Management
 - National Park Service
 - Bureau of Indian Affairs

Data Source: 2000, 2010 Census and Tigerfiles:
Wyoming GIS Library: <http://wvgygl.wygisrc.org>; ESRI basedata



RESEARCH METHODOLOGY

The AI process involves a thorough examination of a variety of sources related to housing, affirmatively furthering fair housing, the fair housing delivery system and housing transactions, particularly for persons who are protected under fair housing law. AI sources include census data, employment and income information, home mortgage application data, fair housing complaint information, surveys of housing industry experts and stakeholders, and related information found in the public domain. Relevant information was collected and evaluated through four general approaches:

1. *Primary Research* – the collection and analysis of raw data that did not previously exist;
2. *Secondary Research* – the review of existing data and studies;
3. *Quantitative Analysis* – the evaluation of objective, measurable and numerical data;
4. *Qualitative Analysis* – the evaluation and assessment of subjective data, such as people’s beliefs, feelings, attitudes, opinions and experiences.

Some of the baseline secondary and quantitative data providing a picture of the state’s housing marketplace were drawn from the U.S. Census Bureau from 2000 and 2010 census counts, intercensal estimates as well as 2005 through 2009 American Community Survey data averages. Data from this source included population, personal income, poverty estimates, housing units by tenure, cost burdens and housing conditions. Economic and employment data were drawn from records provided by the Bureau of Labor Statistics (BLS) and the Bureau of Economic Analysis (BEA). The narrative below offers a brief description of other key data sources employed for the 2011 Wyoming AI.

Home Mortgage Disclosure Act Data

To examine possible fair housing issues in the home mortgage market, Home Mortgage Disclosure Act (HMDA) data were analyzed. The HMDA was enacted by Congress in 1975 and has since been amended several times. It is intended to provide the public with loan data that can be used to determine whether financial institutions are serving the housing credit needs of their communities and to assist in identifying possible discriminatory lending patterns. HMDA requires lenders to publicly disclose the race, ethnicity and sex of mortgage applicants, along with loan application amounts, household income, census tract in which the home is located, and information concerning prospective lender actions related to the loan application. For this analysis, HMDA data from 2004 through 2009 were analyzed with the measurement of denial rates by census tract and by race and ethnicity of applicants as well as the reasons for denial as the key research objectives. These data were also examined to identify the groups and geographic areas most likely to encounter high interest rate loans.

Fair Housing Complaint Data

Housing complaint data were used to analyze housing discrimination in the renting and selling of housing. HUD provided fair housing complaint data for the State of Wyoming from 2005 through 2010. That information included basis of complaint, issues pursuant to the grievance and closure status of the alleged fair housing infraction, which relates to the result of the

investigation including any testing conducted in the enforcement process. This review of nearly 80 fair housing complaints allowed for inspection of the tone and relative degree and frequency of certain types of unfair housing practices seen in the state and the degree to which they were found to be with cause. Analysis of complaint data also focused on determining which protected classes may have been disproportionately impacted by housing discrimination based on the number of complaints, all the while acknowledging that many individuals may be reluctant to step forward with a fair housing complaint for fear of retaliation or similar repercussion.

2011 Wyoming Fair Housing Survey

One of the methods HUD recommends for gathering public input about perceived impediments to fair housing is to conduct a survey. The State of Wyoming elected to utilize such a survey instrument to measure the degree of understanding of fair housing laws and protected classes, awareness of the complaint process, knowledge of possible barriers to fair housing within the private housing sector, perceptions of state and local government policies within the public sector that might adversely affect fair housing, and also views on the effectiveness of fair housing laws. This step was a cost-effective, efficient method to target research resources. The 2011 Wyoming Fair Housing Survey, which was conducted primarily online, received a total of 436 responses.

The 2011 survey targeted individuals involved in the housing arena. The prospective contact list was assembled by the lead agency and consulting organization with the goal of targeting experts in at least the following areas:

- Residential and commercial building codes and regulations,
- State, local and federal occupancy standards,
- Residential health and safety codes and regulations (structural, water and sewer),
- State and local land use planning,
- Banking and insurance laws and regulations,
- Real estate development, real estate sales and management laws and regulations,
- Renter rights and obligations, including civil rights,
- Fair housing, disability, social service and other advocacy organizations,
- Habitat for Humanity and similar housing providers.

The survey approach also assured that selected target populations, through their in-need service provider network or advocacy organizations, were well represented. Furthermore, these entities were utilized to help publicize fair housing planning activities and promote public involvement throughout the AI process.

The survey protocol involved sending an e-mail announcement to each prospective respondent with an introduction to the upcoming survey, its purpose and its intent. A link was provided that directed the respondent to the online survey. The e-mail message also urged respondents to forward the survey announcement to any other individual or agency involved in fair housing. Furthermore, the announcement and survey link were posted on the lead agency's website, distributed to stakeholder associations such as Realtor, banker and property management, and printed copies were made available during public meetings.

As noted above, the survey was designed to address a wide variety of issues related to fair housing and affirmatively furthering fair housing. If limited input on a particular topic was received, it was assumed that the entirety of stakeholders did not view the issue as one of high pervasiveness or impact. This does not mean that this issue was non-existent in the state but rather that there was not a large perception of its prevalence as gauged by survey participants.

The following narrative summarizes key survey themes and data that were to be collected from the survey instrument.

Federal, State and Local Fair Housing Law

Awareness of fair housing laws, understanding of fair housing laws including protected classes, availability of fair housing training and knowledge of the fair housing complaint referral process were the topics of concern in this section. Answers to these questions provided a snapshot of understanding and awareness of fair housing in the state.

Fair Housing in the Private Sector

This section addressed fair housing in Wyoming's private housing sector and offered a series of two-part questions. The first part asked for the respondent to indicate awareness of questionable practices or barriers to fair housing choice in a variety of private sector industries, and the second part requested a narrative description of these questionable practices or concerns if an affirmative response was received. The specific areas of the private sector that respondents were asked to examine included the:

- Rental housing market,
- Real estate industry,
- Mortgage and home lending industries,
- Housing construction or accessible design fields,
- Home insurance industry,
- Home appraisal industry, and
- Any other housing services.

The use of open-ended questions allowed respondents to address any number of concerns such as redlining, neighborhood issues, lease provisions, steering, sub-standard rental housing, occupancy rules, or other fair housing issues in the private housing sector in the state.

Fair Housing in the Public Sector

In a manner similar to the previous section, respondents were asked to offer insight into awareness of questionable practices or barriers to fair housing in the public sector. A list of areas within the public housing sector was provided and respondents were asked to first specify their awareness of fair housing issues within each area and then, if they were indeed aware of any such fair housing issues, to further describe these areas in a narrative fashion. Respondents were asked to identify fair housing issues within the public sector areas listed on the following page.

- Zoning laws,
- Land use policies,
- Occupancy standards or health and safety codes,
- Property tax policies,
- Housing construction standards,
- Neighborhood or community development policies, and
- Any other public administrative actions or regulations.

Respondents were also asked to identify their awareness of barriers that limit access to Wyoming's government services including public housing, transportation or employment services, and also to indicate their awareness of any fair housing compliance issues with public housing authorities.

The questions in this section were used to identify fair housing issues in the state in relation to zoning, building codes, accessibility compliance, subdivision regulations, displacement issues, development practices, residency requirements, property tax policies, land use policies, or NIMBYism.⁴

Fair Housing Activities in Wyoming

The questions in this section were utilized to measure awareness of respondents of outreach and education activities, fair housing testing efforts, and a statewide fair housing plan. Respondents were asked if they were aware of specific geographic areas within the state with fair housing problems and also if they believed that fair housing laws in the state are effective or if they should be changed. The purpose of this section was to gain insight into the effectiveness of current fair housing activities in the state and possible ways to improve the delivery of fair housing services in Wyoming.

2011 Non-Entitlement Community Survey

A survey was also conducted of city leaders and land use managers in the non-entitlement areas of the state or those communities outside of Casper and Cheyenne. The purpose of the survey was to examine the fair housing situation in the public sector more closely in relation to zoning and planning ordinances, practices and policies. Like the fair housing survey discussed above, the non-entitlement community survey was conducted online. The list of solicited participants was derived from a municipal directory for the state and potential participants were recruited via e-mail. Survey questions related to zoning ordinances, planning policies and land use practices as they relate to items such as:

- Definitions of "family,"
- Occupancy standards for large families,
- Definitions of "disability" or "reasonable accommodation,"
- Development standards for housing for persons with disabilities,
- Policies that encourage development of affordable housing options,
- Awareness of standards of development for senior and special needs housing.

⁴ Not In My Backyard

Ultimately, the non-entitlement community survey was used to gain more detailed insight into possible fair housing issues in public sector practices and policies outside of the entitlement cities and in the more rural areas of the state.

Research Conclusions

The final list of impediments to fair housing choice for the State of Wyoming was based on HUD's definition of an impediment to fair housing choice as any action, omission or decision based on protected class status that affects housing choice. Determinations of qualification as an impediment were derived from frequency of occurrence and severity in both quantitative and qualitative findings.

PUBLIC INVOLVEMENT

The State conducted the public input process associated with this AI. The key actions that were used to notify the public of the AI process included e-mail announcements, public postings, and other communication activities directed to citizens and stakeholders in the fair housing arena including the placement of advertisements in daily newspapers.

Additionally, the State held a public input meeting, or fair housing forum, on April 5 in Cheyenne. The meeting was designed to offer the public the opportunity to supply commentary on the status of fair housing in Wyoming as well as provide feedback on the initial findings of the AI. A more detailed discussion of these meetings is presented in Section VI.

The draft report for public review was released on May 27, 2011, and initiated a 30-day public review period. A public review presentation occurred June 22, 2011, and was video broadcast to the cities of Basin, Casper, Cheyenne, Cody, Douglas, Evanston, Gillette, Jackson, Kemmerer, Lander, Laramie, Rawlins, Riverton, Rock Springs, Sheridan, and Torrington. The public involvement efforts were conducted in concert with the Annual Action Plan. The final report was released on July 29, 2011, and was revised on October 5, 2012. The revised final report and is available online at www.wyomingcda.com and www.wybusiness.org.

LEAD AGENCY

The Wyoming Community Development Authority and the Wyoming Business Council served as the lead agency organizations in preparation of the 2011 Analysis of Impediments to Fair Housing Choice. Western Economic Services, LLC, a Portland, Oregon-based consulting firm specializing in analysis and research in support of housing and community development planning, prepared this AI.

Commitment to Fair Housing

In accordance with the applicable statutes and regulations governing the Consolidated Plan, the State of Wyoming certifies that it will *affirmatively further fair housing*. This statement means that the State has conducted an AI, will take appropriate actions to overcome the effects of any impediments identified through that analysis, and will maintain records reflecting that analysis and actions taken in this regard.

SECTION II. SOCIO-ECONOMIC CONTEXT

INTRODUCTION

This section presents demographic, economic and housing information collected from: the U.S. Census Bureau, the Bureau of Economic Analysis, the Bureau of Labor Statistics and other sources. Data were used to analyze a broad range of socioeconomic characteristics including population, race, ethnicity, disability, employment, poverty concentration and housing trends. Ultimately, the information presented in this section illustrates the underlying conditions that have helped shape housing market behavior and housing choice in Wyoming.

While the entirety of data from the 2010 census count was not available at the time this report was produced, some information, such as the total count of population and counts of population by race and ethnicity, was released. To supplement 2000 census data, information for this analysis was also gathered from the U.S. Census Bureau's American Community Survey (ACS). The ACS data cover similar topics as compared to the decennial counts and estimates, but ACS data represent a five-year average of data, in this case, the average from 2005 through 2009. The ACS figures are not directly comparable to decennial census counts for the fact that they do not account for certain population groups, such as the homeless, but they are another useful tool for examining population characteristics in a given area.

In many cases, information is presented for the State of Wyoming along with totals for the two entitlement areas in the state, the City of Casper and the City of Cheyenne, as well as totals for the remaining non-entitlement areas of the state.

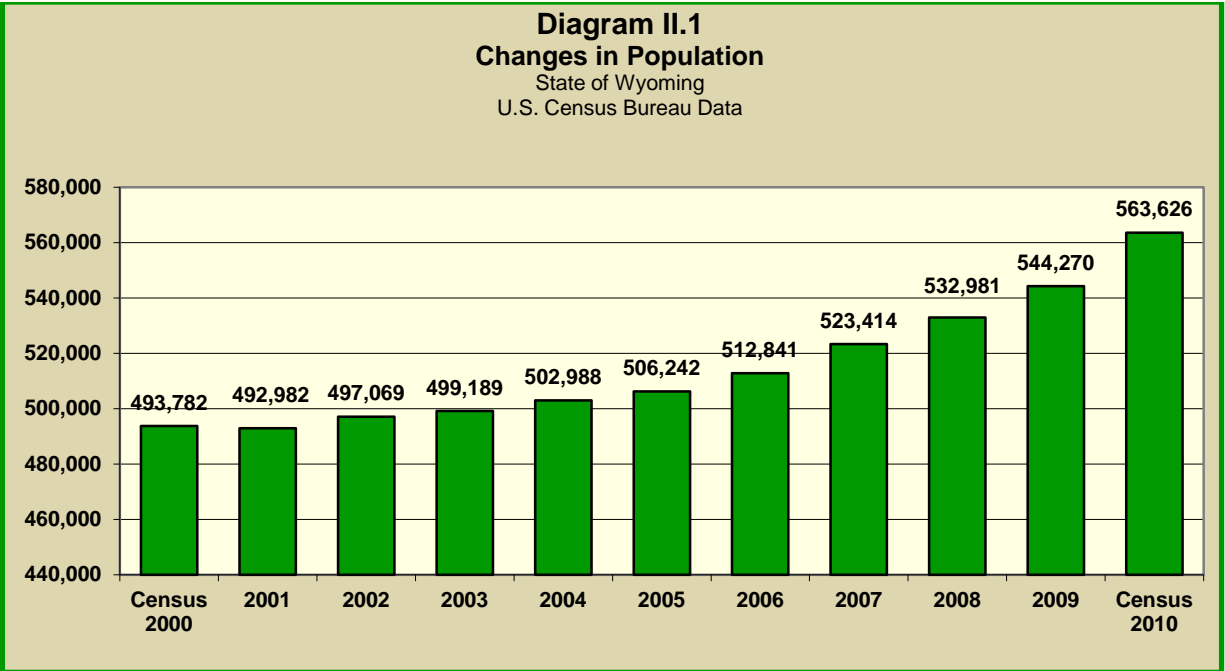
DEMOGRAPHICS

POPULATION DYNAMICS

As shown in Table II.1, at right, the population in the State of Wyoming has increased substantially over the last ten years. From 2000 through 2010, population in the state rose from 493,782 to 563,626 persons; this change represented an increase of more than 14.0 percent.

Diagram II.1, presented on the following page, visually illustrates the changes in population that the state experienced over the last decade. While the population in Wyoming fell slightly from 2000 to 2001, this trend was shortlived and by 2010 the population was shown to have increased by more than 3.5 percent from the previous year.

Year	Total	% Increase
2000 Census	493,782	
2001	492,982	-0.2%
2002	497,069	0.8
2003	499,189	0.4%
2004	502,988	0.8%
2005	506,242	0.6%
2006	512,841	1.3%
2007	523,414	2.1%
2008	532,981	1.8%
2009	544,270	2.1
2010 (Census count)	563,626	3.6%
% Change 00 – 10	14.1%	.



POPULATION BY AGE

Table II.2, on the following page, presents population data by age for the State of Wyoming along with the two entitlement cities and the remainder of the state. At the time of the 2000 census, most persons in Wyoming comprised the 35 to 54 age group cohort and the 5 to 19 age group cohort with 152,844 persons and 114,406 persons, respectively. The smallest age groups at that time comprised persons under 5 years of age and persons aged 20 to 24. ACS data on population by age for the State of Wyoming are also presented in Table II.2. As established previously, ACS data represent a five-year data average from 2005 through 2009. As compared to 2000 census counts, ACS data showed slight increases for those aged 20 to 24 and 55 to 64 of 1.3 and 2.8 percent, respectively, along with some decreases for the age groups of 5 to 19 and 35 to 54, which both fell by about 3.0 percent.

The 2000 census data for the entitlement and non-entitlement areas of the state showed that these areas held similar proportions of age groups. For example, Casper, Cheyenne and the remainder of the state each held around 6.0 percent of the population under the age of 5 and roughly 30.0 percent of the population aged 35 to 54. More recent data from the ACS data showed that the entitlement and non-entitlement areas of the state saw a decrease in the age groups of 5 to 19 and 35 to 54.

Table II.2
Population by Age
 State of Wyoming
 U.S. Census Bureau Data

Age	2000 Census		2009 Five-Year ACS	
	Population	% of Total	Population	% of Total
City of Casper				
Under 5	3,264	6.6%	3,918	7.4%
5 to 19	11,318	22.8%	10,689	20.2%
20 to 24	3,455	7.0%	4,060	7.7%
25 to 34	6,125	12.3%	7,742	14.6%
35 to 54	14,665	29.5%	13,829	26.1%
55 to 64	4,063	8.2%	5,510	10.4%
64 and Over	6,754	13.6%	7,237	13.7%
Total	49,644	100.0%	52,985	100.0%
City of Cheyenne				
Under 5	3,422	6.5%	4,079	7.2%
5 to 19	11,115	21.0%	11,099	19.7%
20 to 24	3,337	6.3%	4,430	7.9%
25 to 34	7,362	13.9%	8,408	14.9%
35 to 54	15,810	29.8%	14,449	25.7%
55 to 64	4,652	8.8%	6,284	11.2%
64 and Over	7,313	13.8%	7,575	13.4%
Total	53,011	100.0%	56,324	100.0%
Remainder of Wyoming				
Under 5	24,254	6.2%	27,956	6.7%
5 to 19	91,973	23.5%	84,165	20.3%
20 to 24	26,663	6.8%	34,078	8.2%
25 to 34	46,367	11.9%	51,252	12.4%
35 to 54	122,369	31.3%	118,149	28.5%
55 to 64	35,875	9.2%	50,248	12.1%
64 and Over	43,626	11.2%	48,792	11.8%
Total	391,127	100.0%	414,640	100.0%
State of Wyoming				
Under 5	30,940	6.3%	35,953	6.9%
5 to 19	114,406	23.2%	105,953	20.2%
20 to 24	33,455	6.8%	42,568	8.1%
25 to 34	59,854	12.1%	67,402	12.9%
35 to 54	152,844	31.0%	146,427	27.9%
55 to 64	44,590	9.0%	62,042	11.8%
64 and Over	57,693	11.7%	63,604	12.1%
Total	493,782	100.0%	523,949	100.0%

POPULATION BY RACE AND ETHNICITY

At the time that the 2000 census was taken, the racial composition of the State of Wyoming was predominantly white; this group comprised 92.1 percent of the total population at 454,670 persons. The next most populous group was listed as “other” race and accounted for 2.5 percent of the population or 12,301 persons, followed by American Indian at 2.3 percent or 11,133 persons. These data are presented on the following page in Table II.3. More recent data regarding racial populations from the 2010 census count are also presented in Table II.3. These data show that while the white population increased in total, the percentage share of this racial group declined to 90.7 percent. All other racial minority groups showed slight to moderate gains in population count.

In terms of the racial makeup of the entitlement and non-entitlement areas of the state, different concentrations of racial groups were seen throughout these specific areas. For example, in 2000, the City of Cheyenne showed a higher concentration of certain minority populations including black and Asian persons as compared to the City of Casper and the remainder of the state. By 2010, the population of minority groups increased in all areas, but the City of Cheyenne continued to show higher proportions of black and Asian persons. The American Indian population was more concentrated in the remainder of the state in both 2000 and 2010 data.

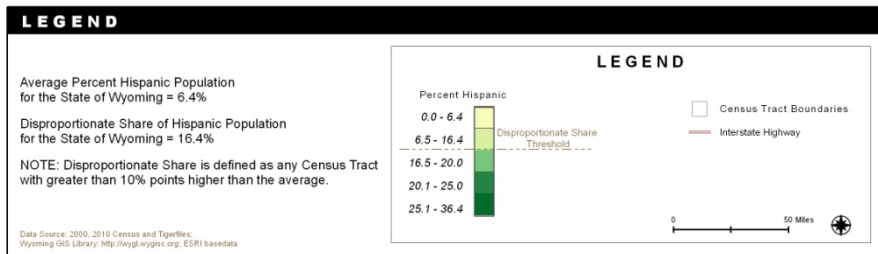
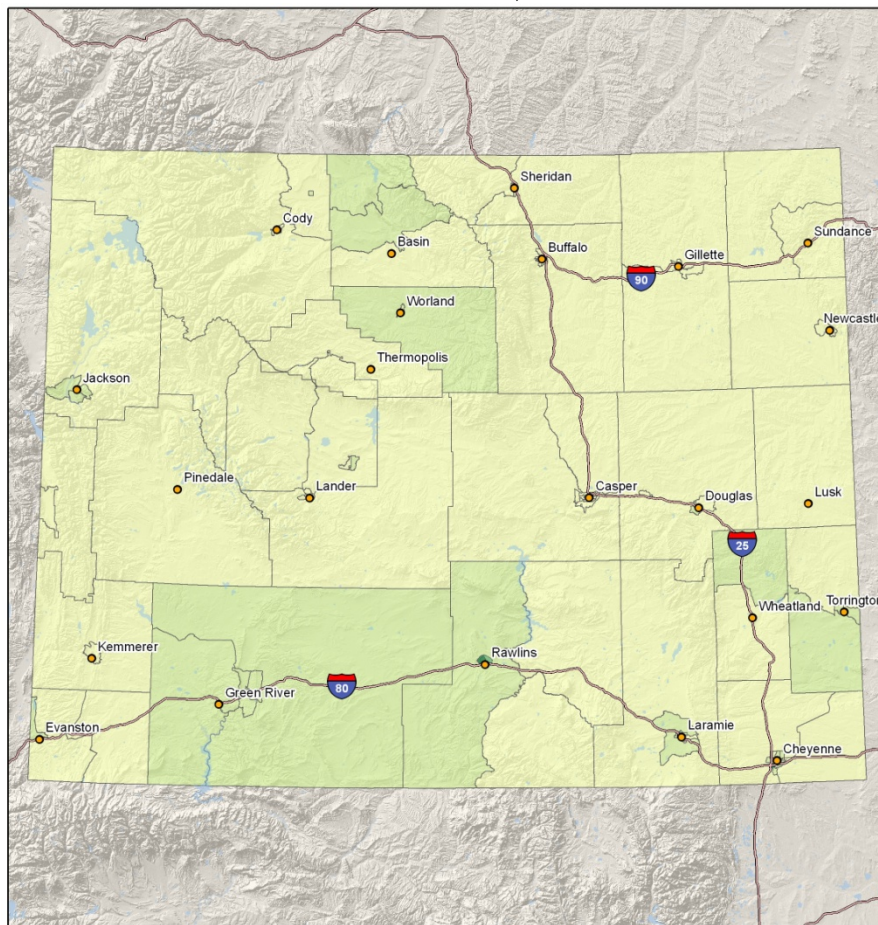
Data on the ethnic composition of the state, which is tabulated separately from race and is presented in Table II.3, showed that the Hispanic population comprised 31,669 persons in 2000, but this figure increased to 50,231 persons by 2010. The percentage of persons counted as Hispanic increased by 2.5 percentage points during this time from 6.4 percent to 8.9 percent.

The proportion of Hispanic persons was also noted to be higher in Cheyenne as compared to the other entitlement and non-entitlement areas of the state; in fact, the proportion of the Hispanic population was more than double in Cheyenne compared to the other geographic areas. However, from 2000 to 2010, the number of Hispanic persons counted in Casper, Cheyenne and the remainder of the state all showed significant increases. In Casper, the Hispanic population increased from 2,656 persons to 4,070 persons or from 5.4 percent to 7.4 percent. In the City of Cheyenne, the number of Hispanic persons grew from 6,646 to 8,594 or from 12.5 percent to 14.5 percent. And in the remainder of the state, the Hispanic population grew from 22,367 to 45,707 or from 5.7 percent to 8.2 percent.

Table II.3				
Population by Race/Ethnicity				
State of Wyoming				
U.S. Census Bureau Data				
Race/Ethnicity	2000 Census		2010 Census	
	Population	% of Total	Population	% of Total
City of Casper				
White	46,680	94.0%	51,048	92.3%
Black	428	0.9%	560	1.0%
American Indian	495	1.0%	521	0.9%
Asian	245	0.5%	436	0.8%
Native Hawaiian/Pacific Islander	10	0.0%	26	0.0%
Other	1,011	2.0%	1,295	2.3%
Two or More Races	775	1.6%	1,430	2.6%
Total	49,644	100.0%	55,316	100.0%
Hispanic (Ethnicity)	2,656	5.4%	4,070	7.4%
City of Cheyenne				
White	46,707	88.1%	51,999	87.4%
Black	1,472	2.8%	1,715	2.9%
American Indian	430	0.8%	570	1.0%
Asian	561	1.1%	732	1.2%
Native Hawaiian/Pacific Islander	59	0.1%	118	0.2%
Other	2,356	4.4%	2,380	4.0%
Two or More Races	1,426	2.7%	1,952	3.3%
Total	53,011	100.0%	59,466	100.0%
Hispanic (Ethnicity)	6,646	12.5%	8,594	14.5%
Remainder of State				
White	361,283	92.4%	510,328	91.2%
Black	1,822	0.5%	3,593	0.6%
American Indian	10,208	2.6%	13,287	2.4%
Asian	1,965	0.5%	4,130	0.7%
Native Hawaiian/Pacific Islander	233	0.1%	335	0.1%
Other	8,934	2.3%	15,964	2.9%
Two or More Races	6,682	1.7%	11,839	2.1%
Total	391,127	100.0%	559,476	100.0%
Hispanic (Ethnicity)	22,367	5.7%	45,707	8.2%
State of Wyoming				
White	454,670	92.1%	511,279	90.7%
Black	3,722	0.8%	4,748	0.8%
American Indian	11,133	2.3%	13,336	2.4%
Asian	2,771	0.6%	4,426	0.8%
Native Hawaiian/Pacific Islander	302	0.1%	427	0.1%
Other	12,301	2.5%	17,049	3.0%
Two or More Races	8,883	1.8%	12,361	2.2%
Total	493,782	100.0%	563,626	100.0%
Hispanic (Ethnicity)	31,669	6.4%	50,231	8.9%

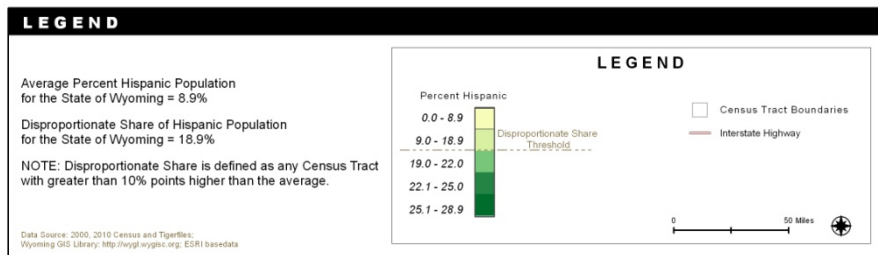
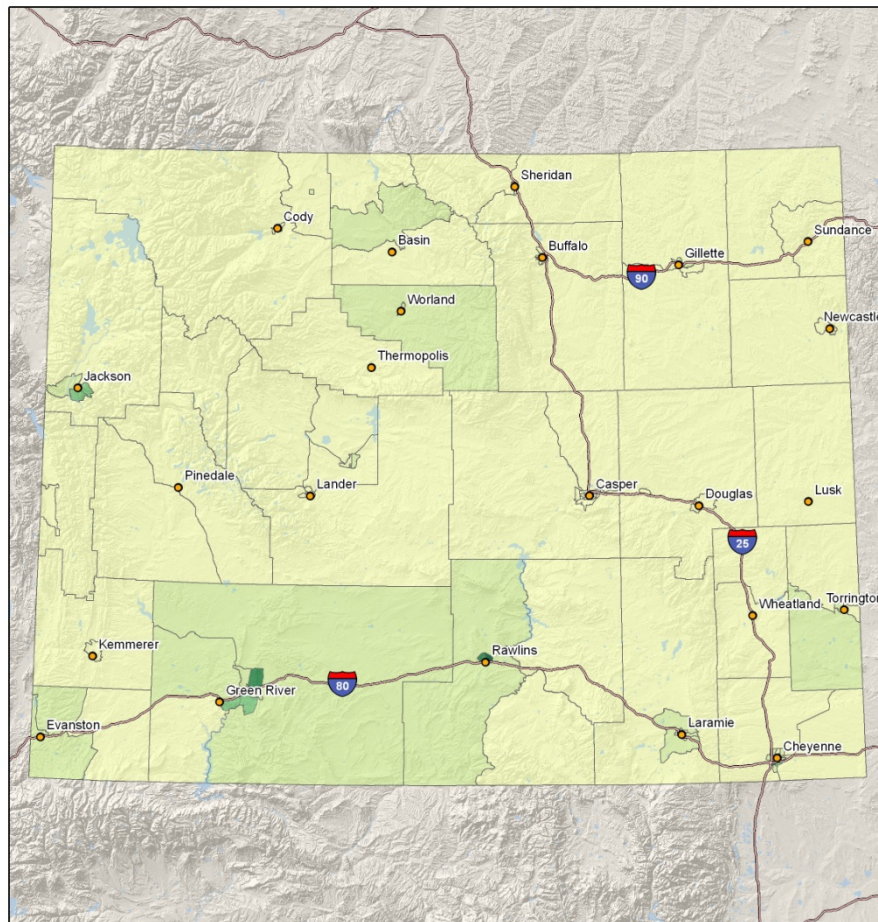
HUD defines a population as having a disproportionate share when the portion of that population is more than 10 percentage points higher than the jurisdiction average. Analysis of racial and ethnic distribution was conducted by calculating race or ethnicity as the percentage share of total population and then plotting the data on a geographic map of census tracts in Wyoming to determine if disproportionate shares exist. For the sake of comparison, maps were produced for Hispanic, American Indian and black populations based on both 2000 and 2010 data in order to examine how the concentrations of these populations have changed over time. The distribution of the Hispanic population is presented in Map II.1 and shows only a slight disproportionate share of this ethnic group in the area around the City of Rawlins.

Map II.1
Percent Hispanic Population by Census Tract
 State of Wyoming
 Census Bureau Data, 2000



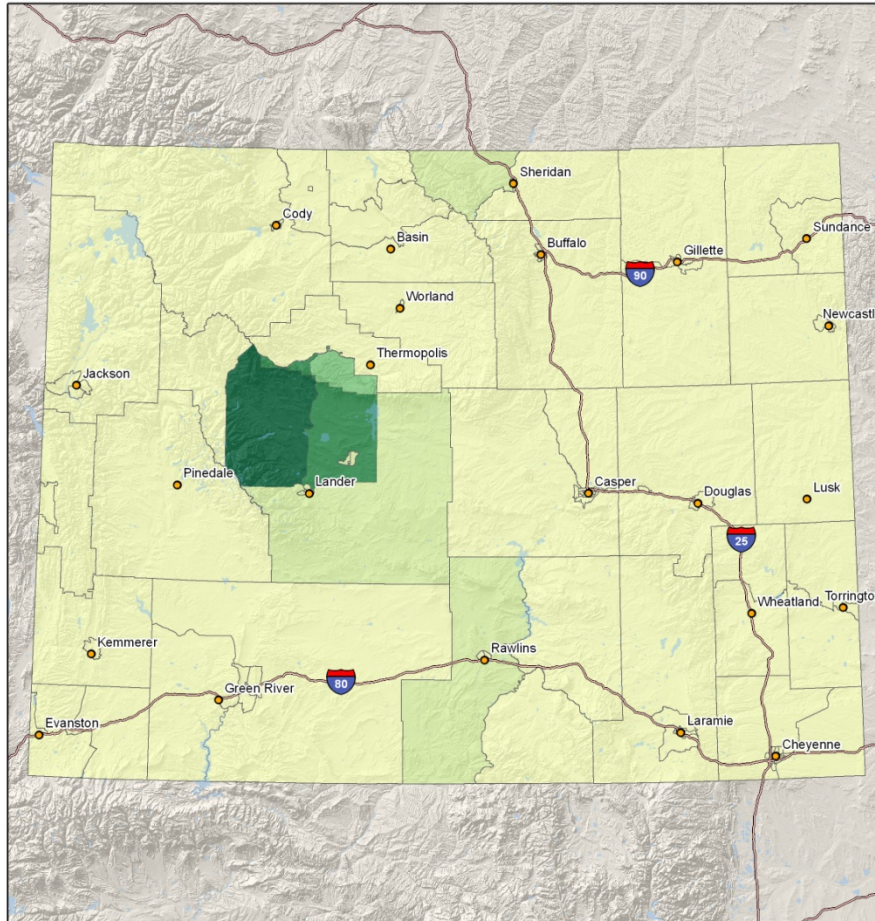
A map of the geographic concentration of the Hispanic population as of the 2010 census count is presented below as Map II.2. This map shows that the concentration of the Hispanic population has not significantly changed since the last decennial census, with the exception of a few areas of the state showing increased concentrations of this population. Areas with slightly increased concentration of the Hispanic population were shown near Evanston, Green River, Basin and Wheatland, while areas that showed new disproportionate shares of the Hispanic population were found near Jackson, Green River and Rawlins.

Map II.2
Percent Hispanic Population by Census Tract
 State of Wyoming
 Census Bureau Data, 2010



A shown in Map II.3, below, the American Indian population was also slightly concentrated in Wyoming at the time of the 2000 census. This population was concentrated below disproportionate share levels near Sheridan, Lander and Rawlins and was concentrated above disproportionate share levels northeast of Pinedale in or adjacent to the Wind River Indian Reservation.

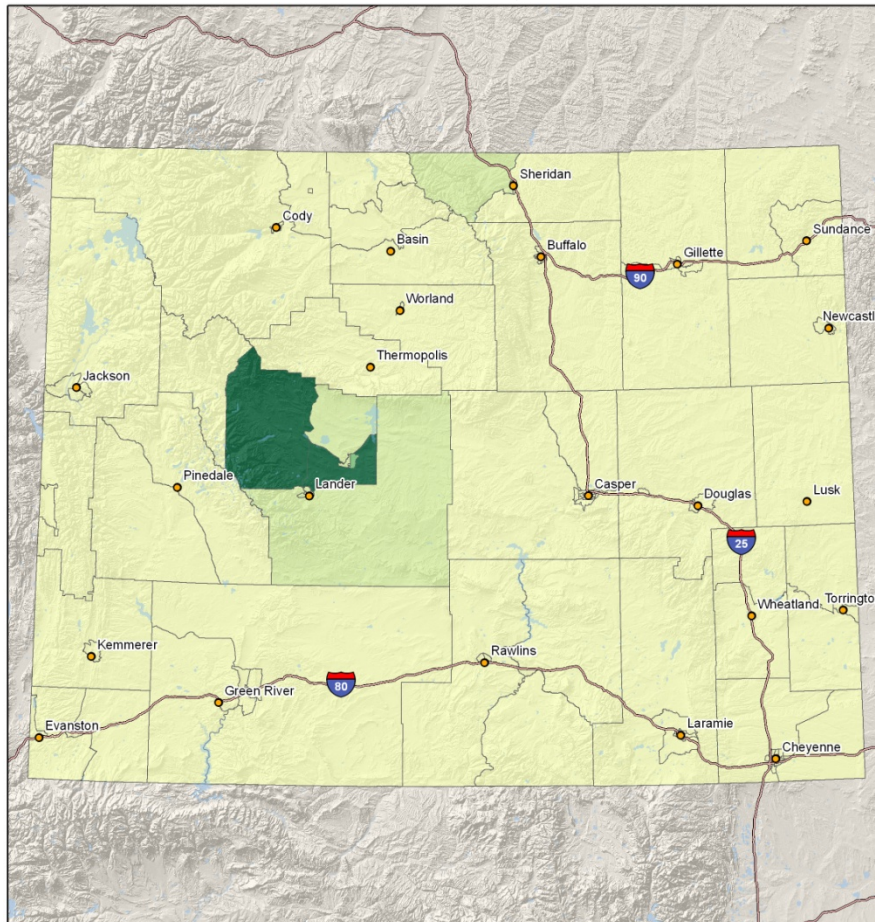
Map II.3
Percent American Indian Population by Census Tract
 State of Wyoming
 Census Bureau Data, 2000



LEGEND																	
Average Percent American Indian Population for the State of Wyoming = 2.3% Disproportionate Share of American Indian Population for the State of Wyoming = 12.3% NOTE: Disproportionate Share is defined as any Census Tract with greater than 10% points higher than the average.																	
<table border="1"> <thead> <tr> <th colspan="2">LEGEND</th> </tr> </thead> <tbody> <tr> <td>0.0 - 2.3</td> <td>Disproportionate Share Threshold</td> </tr> <tr> <td>2.4 - 12.3</td> <td></td> </tr> <tr> <td>12.4 - 20.0</td> <td></td> </tr> <tr> <td>20.1 - 50.0</td> <td></td> </tr> <tr> <td>50.1 - 82.5</td> <td></td> </tr> </tbody> </table>	LEGEND		0.0 - 2.3	Disproportionate Share Threshold	2.4 - 12.3		12.4 - 20.0		20.1 - 50.0		50.1 - 82.5		<table border="1"> <tbody> <tr> <td></td> <td>Census Tract Boundaries</td> </tr> <tr> <td></td> <td>Interstate Highway</td> </tr> </tbody> </table>		Census Tract Boundaries		Interstate Highway
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Data Source: 2000, 2010 Census and Tigerfiles; Wyoming GIS Library, http://wygi.wygis.org ; EDRI basedata																	

Interestingly, the concentration of the American Indian population as counted in the 2010 census data shows that some areas of the state actually became less concentrated, such as in the tract containing the City of Rawlins and also in tracts south of Thermopolis.⁵ Still, the primary concentrations were near the Wind River Indian Reservation.

Map II.4
Percent American Indian Population by Census Tract
 State of Wyoming
 Census Bureau Data, 2010

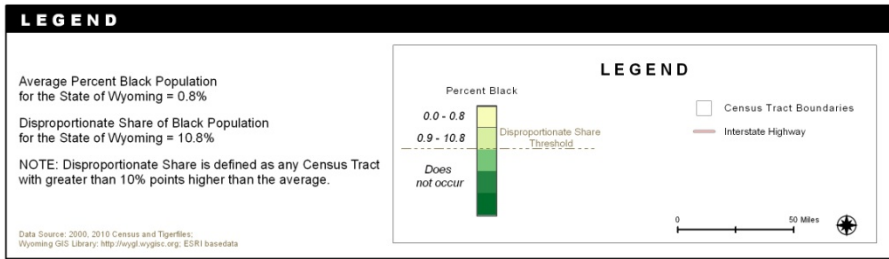
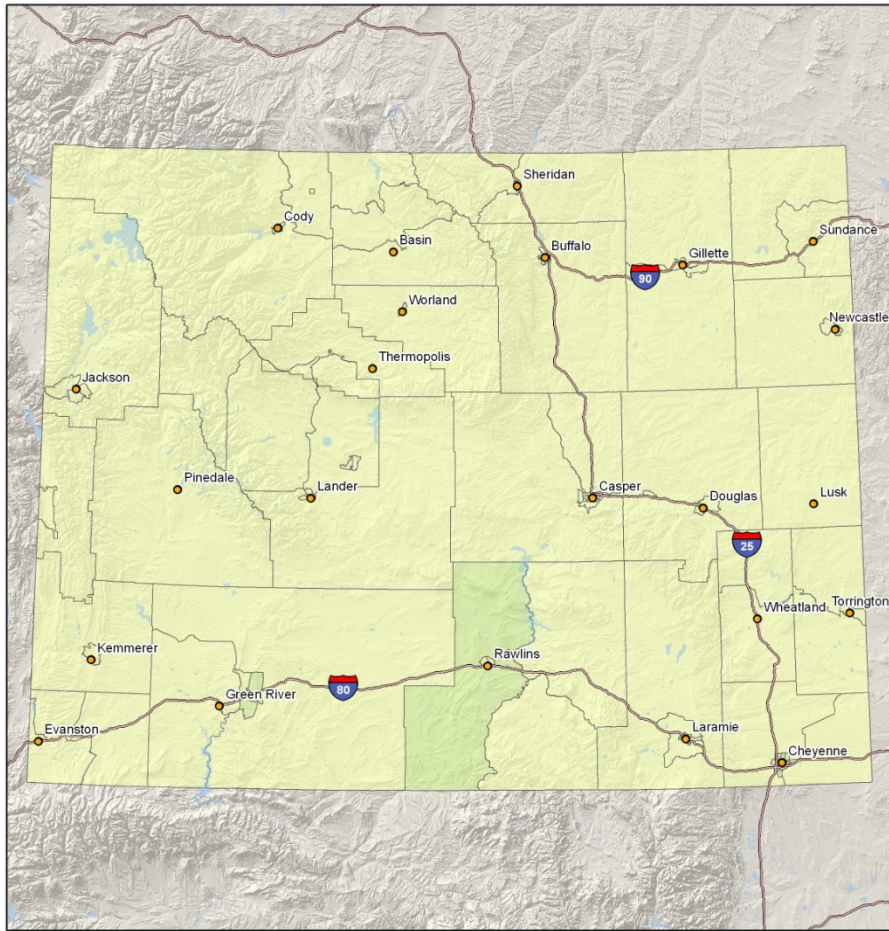


LEGEND																	
Average Percent American Indian Population for the State of Wyoming = 2.4% Disproportionate Share of American Indian Population for the State of Wyoming = 12.4% NOTE: Disproportionate Share is defined as any Census Tract with greater than 10% points higher than the average.																	
<table border="1"> <thead> <tr> <th colspan="2">LEGEND</th> </tr> </thead> <tbody> <tr> <td>0.0 - 2.4</td> <td>Disproportionate Share Threshold</td> </tr> <tr> <td>2.5 - 12.4</td> <td></td> </tr> <tr> <td>12.5 - 20.0</td> <td></td> </tr> <tr> <td>20.1 - 50.0</td> <td></td> </tr> <tr> <td>50.1 - 81.7</td> <td></td> </tr> </tbody> </table>	LEGEND		0.0 - 2.4	Disproportionate Share Threshold	2.5 - 12.4		12.5 - 20.0		20.1 - 50.0		50.1 - 81.7		<table border="1"> <tbody> <tr> <td></td> <td>Census Tract Boundaries</td> </tr> <tr> <td></td> <td>Interstate Highway</td> </tr> </tbody> </table>		Census Tract Boundaries		Interstate Highway
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Data Source: 2000, 2010 Census and Tigerfiles; Wyoming GIS Library: http://wygi.wydot.org ; EDR1 basedata 0 50 Miles																	

⁵ Some changes in this map represents revisions in the census tract designations between 2000 and 2010. For example, some census tracts southwest of Thermopolis were merged, and census tracts north of Lander were split.

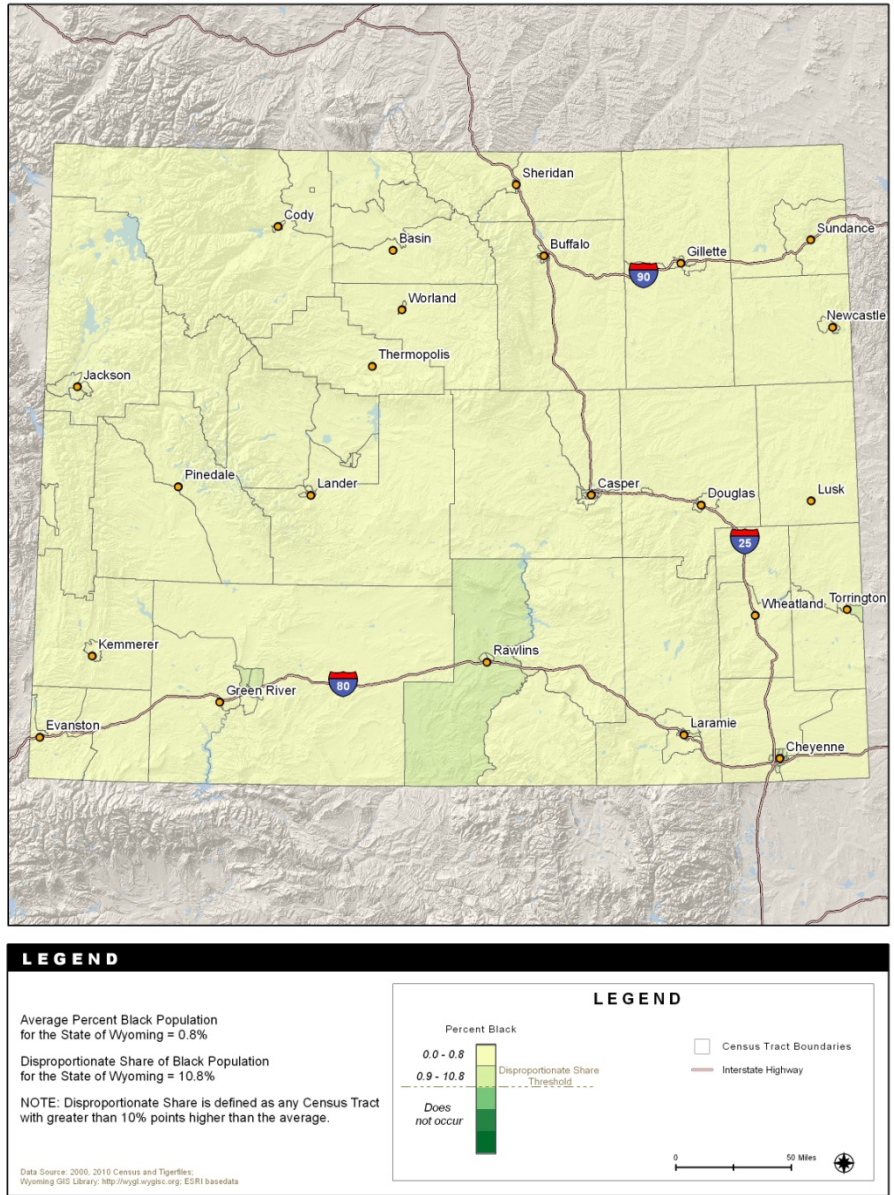
Map II.5 presents the geographic concentration of the black population in the State of Wyoming as of the 2000 census. This racial group was shown to be slightly concentrated in tracts near Green River and also in Rawlins as compared to the state average. However, no disproportionate shares of this population were found in the remainder of the state.

Map II.5
Percent Black Population by Census Tract
 State of Wyoming
 Census Bureau Data, 2000



Map II.6, shown below, demonstrates the concentration of the black population in Wyoming at the time of the 2010 census. This map essentially mimics the findings of the map on the previous page with the exception of a shift in concentrations in tracts near Green River.

Map II.6
Percent Black Population by Census Tract
 State of Wyoming
 Census Bureau Data, 2010



DISABILITY STATUS

Disability is defined by the Census Bureau as a lasting physical, mental or emotional condition that makes it difficult for a person to conduct daily activities of living or impedes them from being able to go outside the home alone or to work.

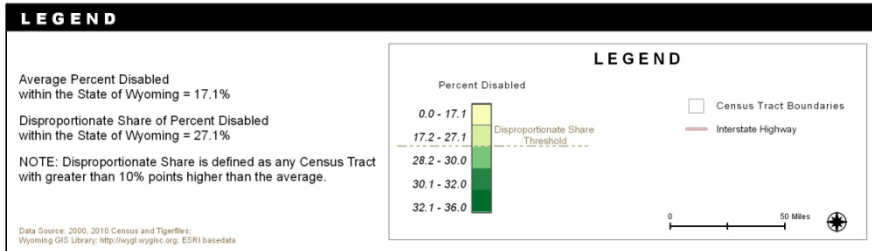
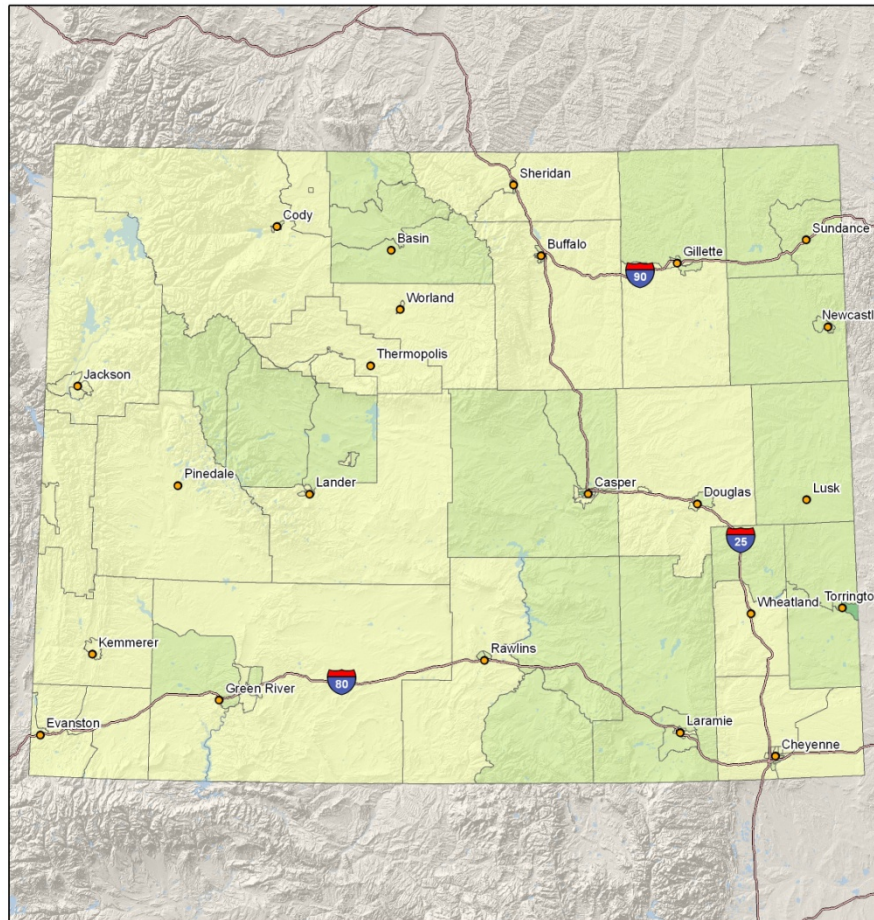
According to 2000 census count data, for all persons aged 5 years or older, the State of Wyoming had a disability rate of 17.1 percent, which was slightly lower than the 19.0 percent national rate at that time. This rate represented 77,143 persons living with a disability in the state. These data are displayed below in Table II.4.

Disability rates varied slightly in the entitlement and non-entitlement areas of the state. The cities of Casper and Cheyenne showed similar disability rates at 18.3 and 18.4 percent, respectively; these rates were only slightly higher than the statewide average. Disability data for the remainder of the state showed a rate just below the state average at 16.8 percent.

Age	Casper	Cheyenne	Remainder	Wyoming
5 to 15	511	510	3,804	4,825
16 to 64	5,606	5,380	39,857	50,843
Over 65	2,309	2,752	16,414	21,475
Total	8,426	8,642	60,075	77,143
Disability Rate	18.3%	18.4%	16.8%	17.1%

Geographic distribution of the disabled population in Wyoming as of the 2000 census is presented on the following page in Map II.7. This map shows that the disabled population was found to be slightly concentrated in the City of Casper and near the City of Torrington in southeast Wyoming. These areas showed a concentration of poverty as high as 36.0 percent.

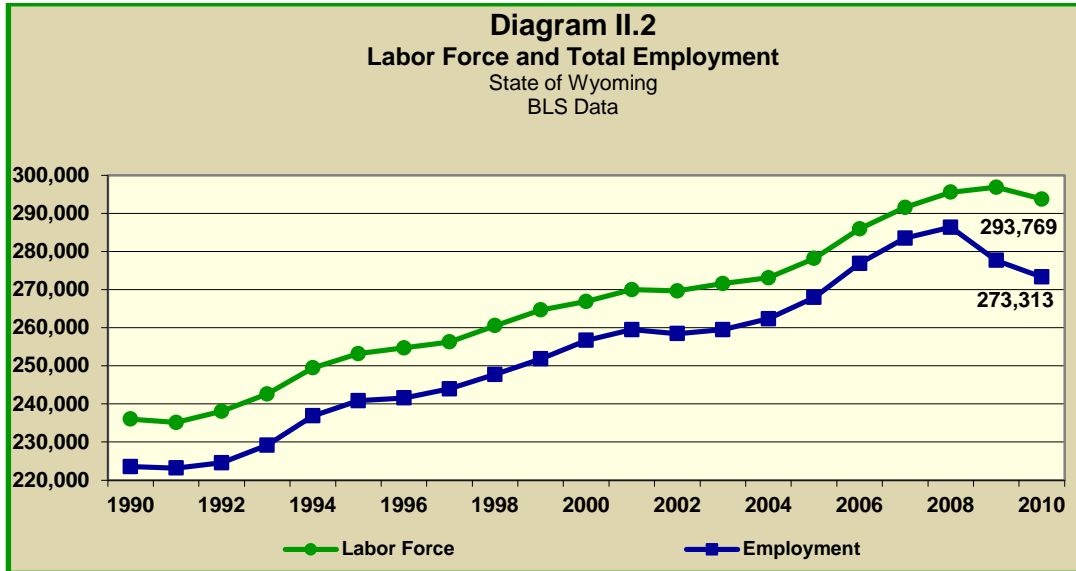
Map II.7
Disabled Population by Census Tract
 State of Wyoming
 Census Bureau Data, 2000



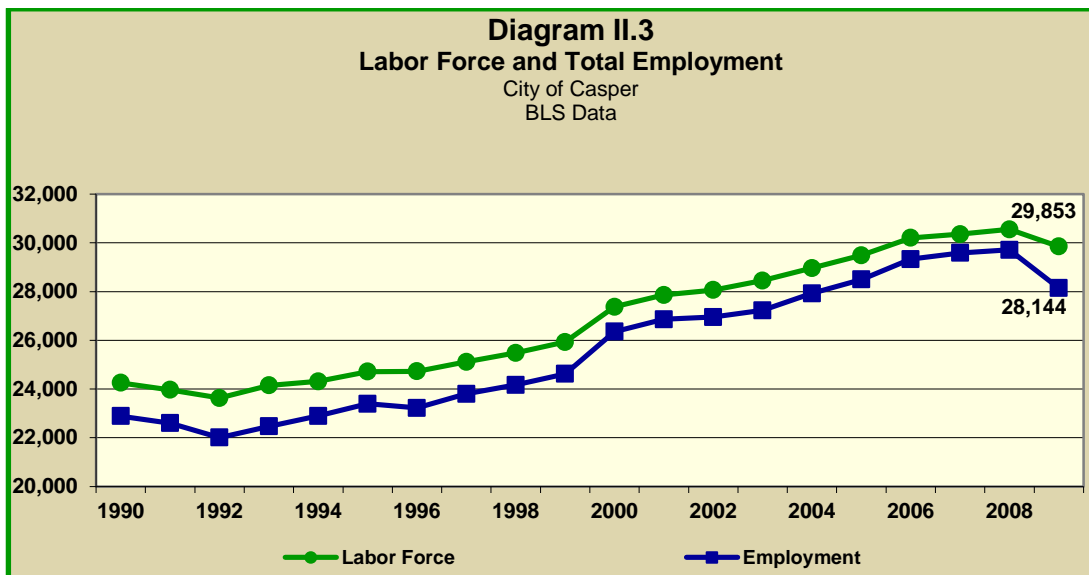
ECONOMICS

LABOR FORCE AND EMPLOYMENT

Data regarding the labor force, defined as the total number of persons working or looking for work, and employment, or the number of persons working, are presented below in Diagram II.2. As shown, labor force and employment figures increased in a similar manner until 2009 when the labor force continued to increase and employment figure suddenly dropped.



While BLS data regarding cities is only available through 2009, a similar pattern was seen in the data for labor force and employment for the City of Casper, as presented below in Diagram II.3.



Labor force and employment data for Cheyenne showed a slightly different pattern in that a significant decrease in both data sets was seen in 2000 followed by a slow recovery. The same decrease was seen in employment figures in 2009 as was experienced in the City of Casper and the state as a whole.⁶

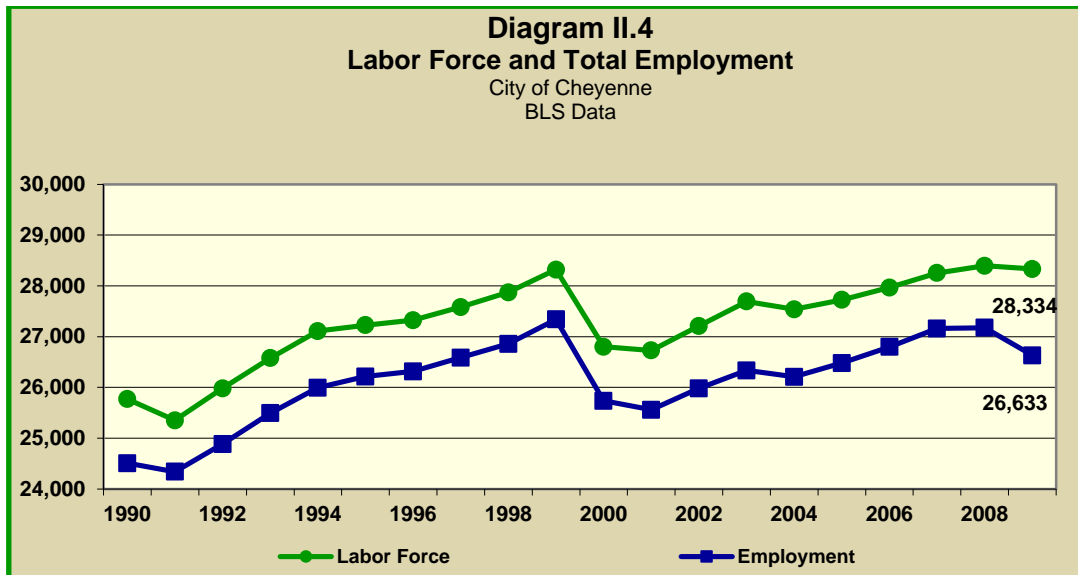
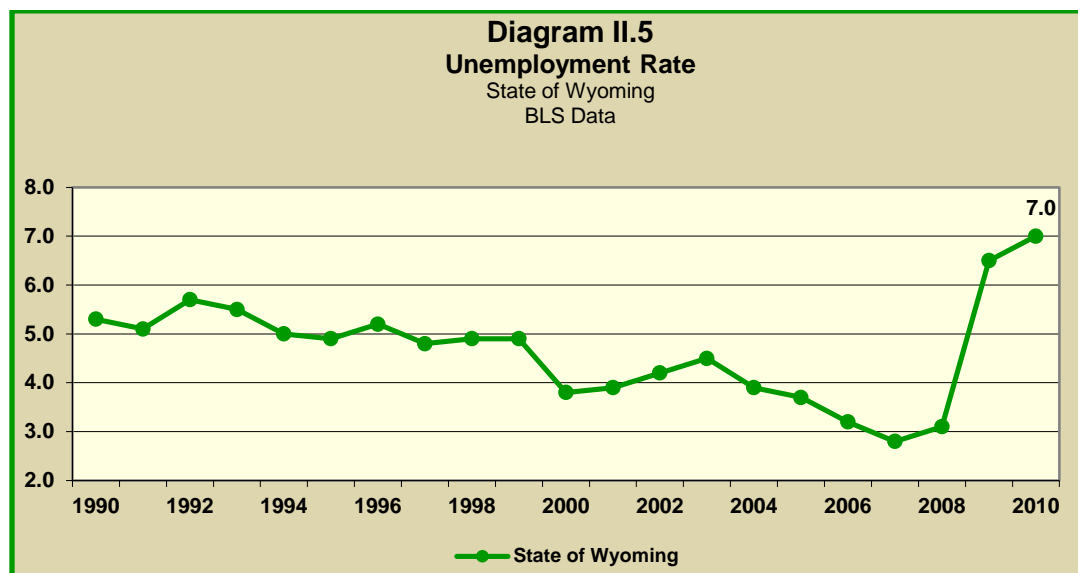
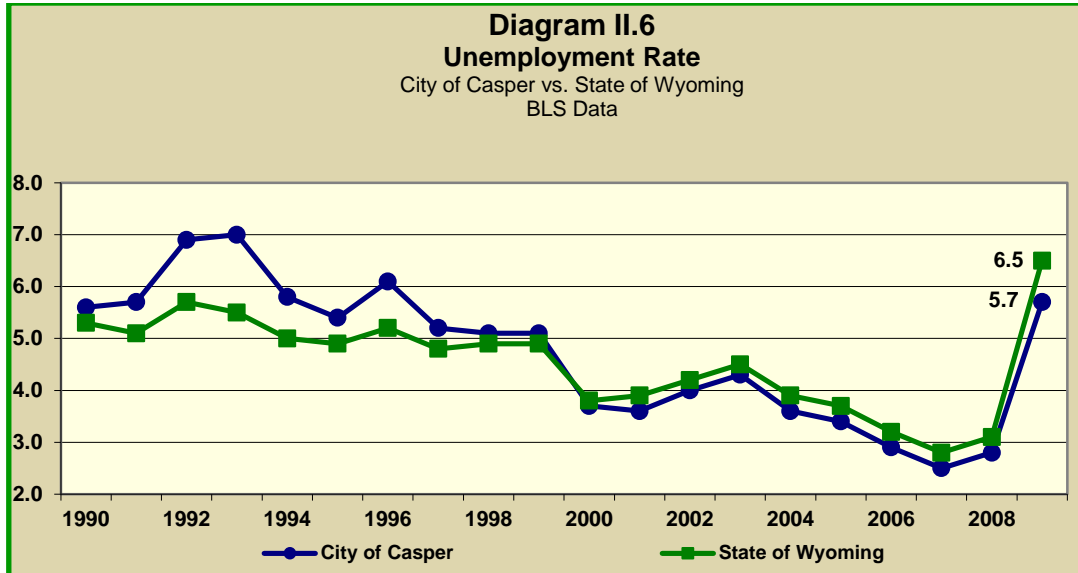


Diagram II.5 presents the unemployment rate in the State of Wyoming from 1990 through 2010. As a result of the increasing labor force and decreasing employment rate beginning in 2009, the unemployment rate increased dramatically. In 2010, Wyoming’s unemployment rate stood at 7.0 percent.

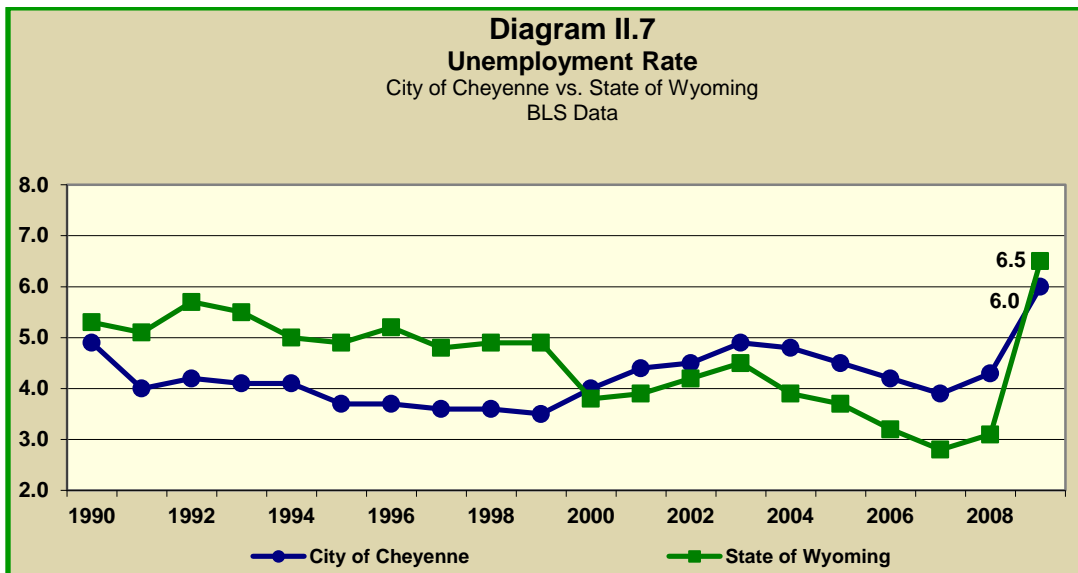


⁶ The shift in the data occurring in 2000 is attributable to a statistical anomaly due to rebasing of the BLS survey methodology.

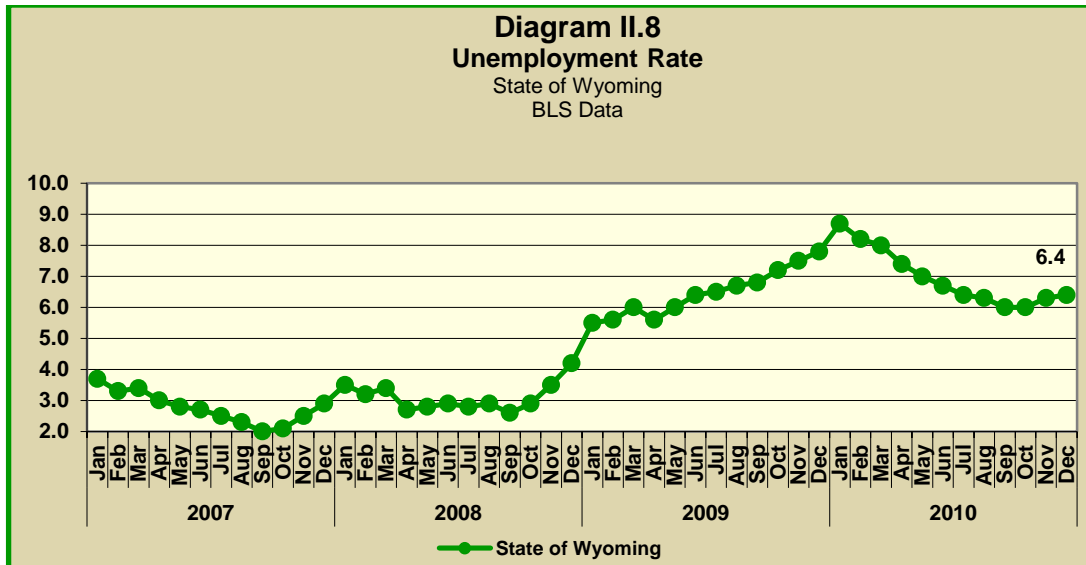
While Casper's unemployment rate was slightly more volatile in the early 1990s compared to the state rate, the two areas have experienced nearly identical unemployment rates since around 1998. In 2009 the unemployment rate in Casper was 5.7 percent while the state rate was 6.5 percent.



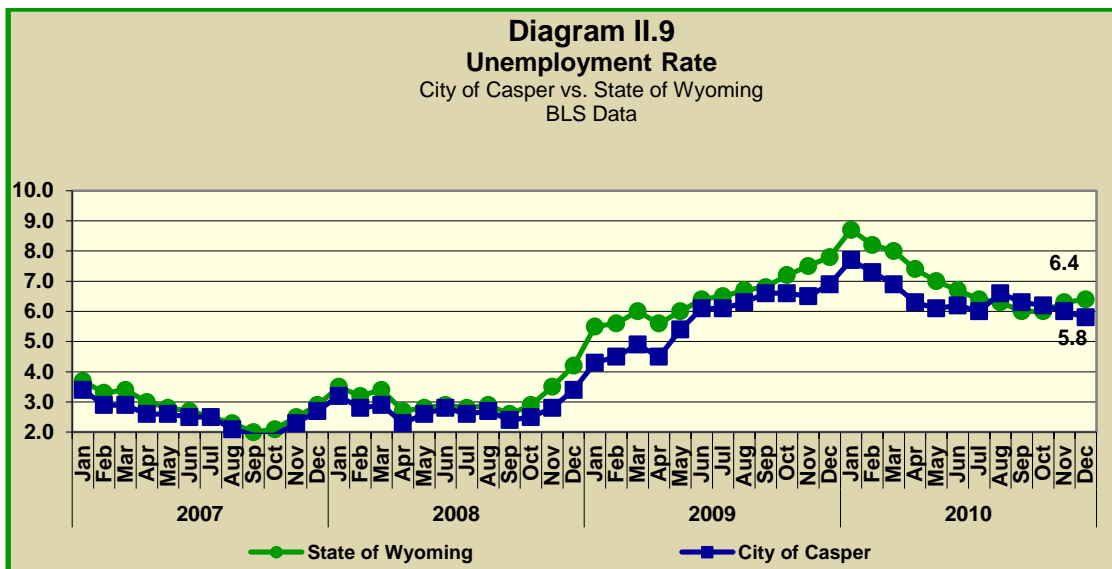
Unemployment data for the City of Cheyenne are presented below in Diagram II.7. Between 1990 and 2000, Cheyenne experienced a lower unemployment rate than the state, but after 2000 the rate in Cheyenne exceeded the rate for Wyoming. By 2009, Cheyenne's rate was 0.5 percent below the rate for the state.



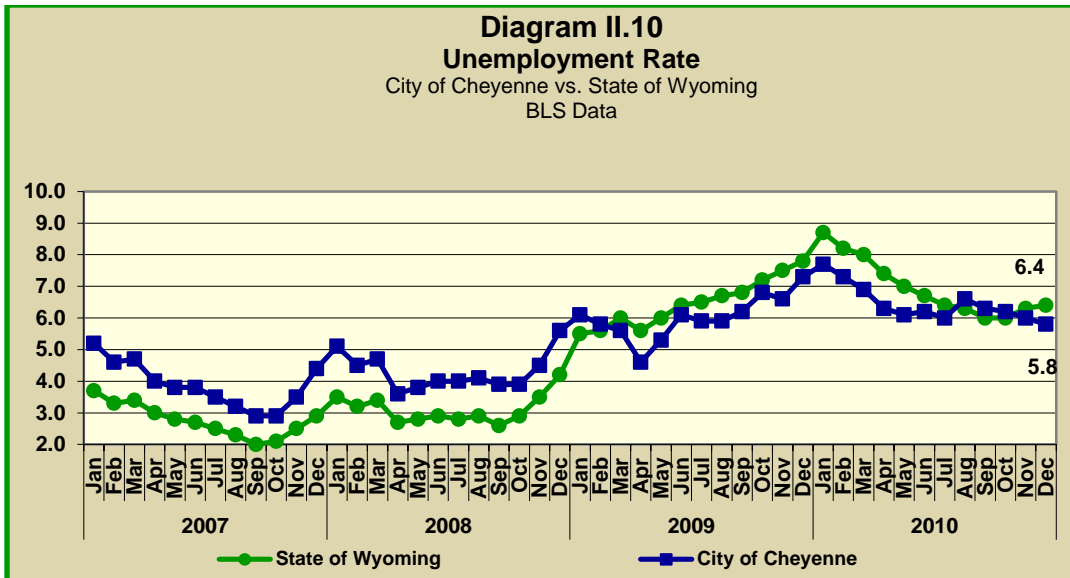
More recent monthly unemployment rate data are presented in Diagram II.8. As shown, the unemployment rate in the State of Wyoming was very low until the beginning of 2009 when it quickly doubled. By the beginning of 2010, the rate was nearly 9.0 percent, but by latter 2010 the rate had fallen significantly.



Again, monthly employment rates for the City of Casper were very similar to those seen above for the state, although the rates for Casper were slightly below the rates for the state.

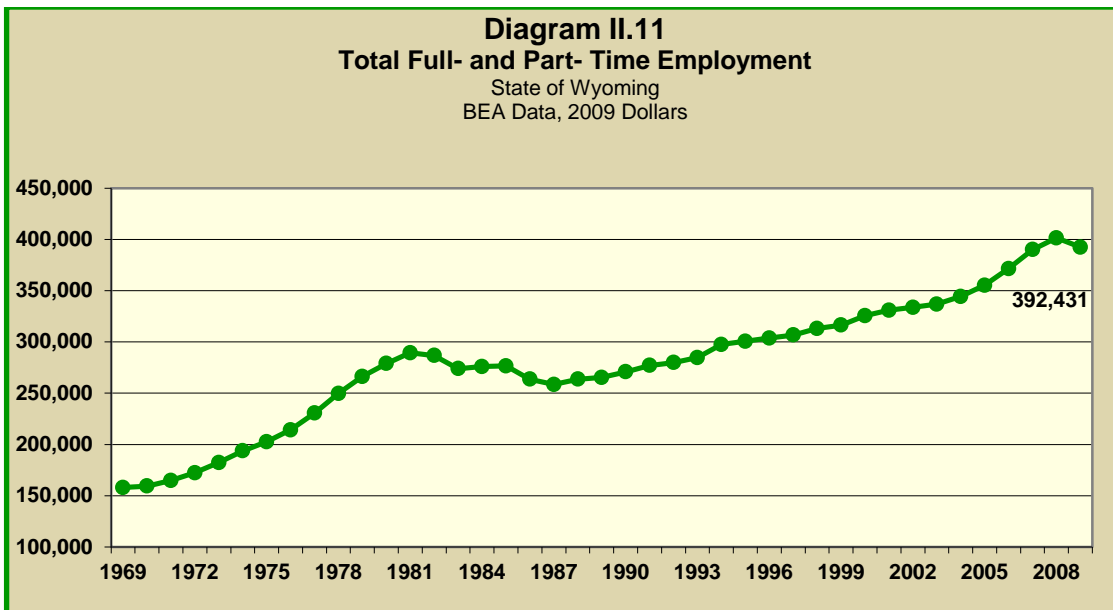


Monthly unemployment data for Cheyenne, presented in Diagram II.10 on the following page, show that the city's rate evened out to around 6.0 percent by the end of 2010.

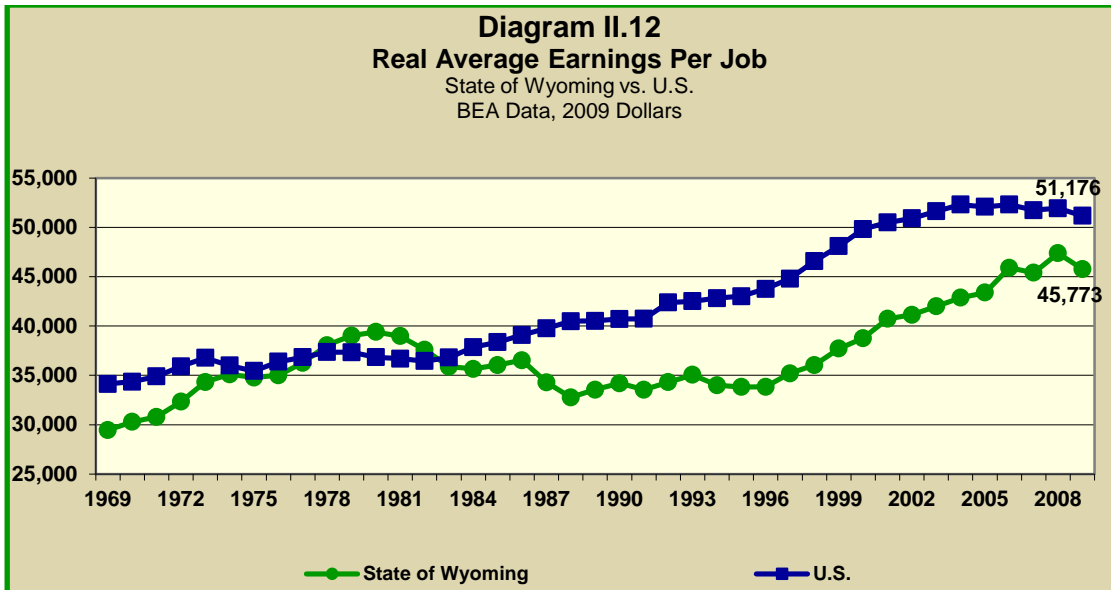


FULL- AND PART-TIME EMPLOYMENT AND EARNINGS

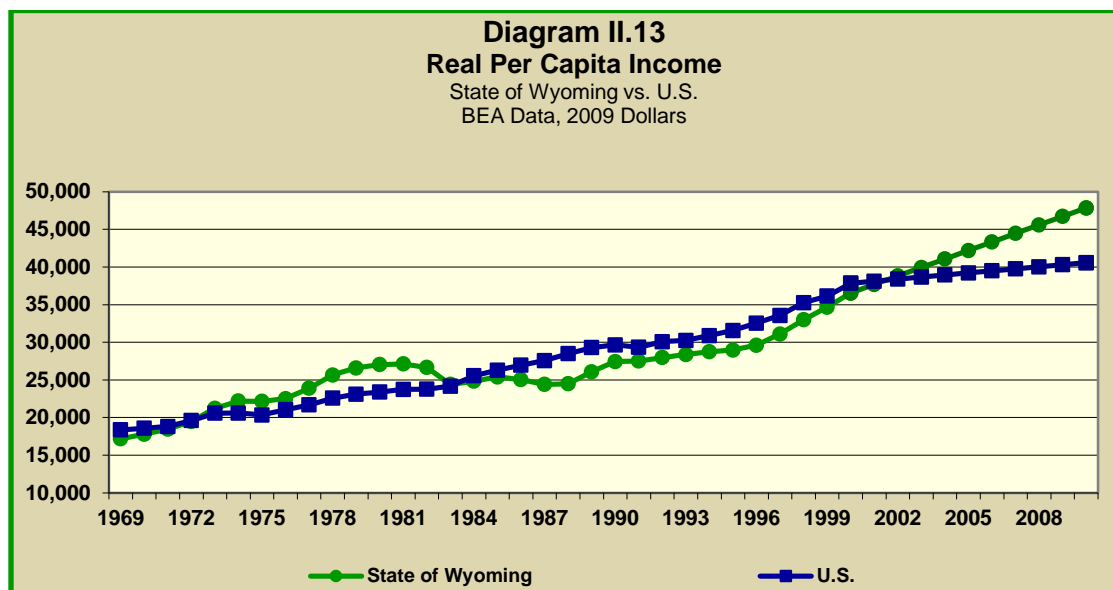
The Bureau of Economic Analysis (BEA) provides an alternate view of employment: a count of both full- and part-time jobs. Thus, a person working more than one job can be counted more than once. Data presented herein are for the state only, as city-level data are not available from the BEA. As shown in Diagram II.11, below, the total number of full- and part-time jobs in the State of Wyoming increased substantially from 1969 through 2009 by more than 200,000 jobs.



When total earnings from employment is divided by the number of jobs and then deflated to remove the effects of inflation, average real earnings per job is determined. Average earnings per job in the state have varied significantly but have generally fallen below national levels, with the exception of a short period during the late 1970s and early 1980s, as seen on the following page in Diagram II.12.



Another gauge of economic health involves comparing the total of all forms of income: wages earned, transfer payments, and property income, such as dividends, interest and rents. When these data are added together and divided by population, per capita income is determined. Diagram II.13 compares real per capita income in Wyoming to the U.S. from 1969 through 2010. This figure shows that per capita income grew relatively steadily throughout the time period. By the middle of the last decade, real per capita income in the state again exceeded national figures, as it did in the late 1970s and early 1980s.



HOUSEHOLD AND FAMILY INCOME

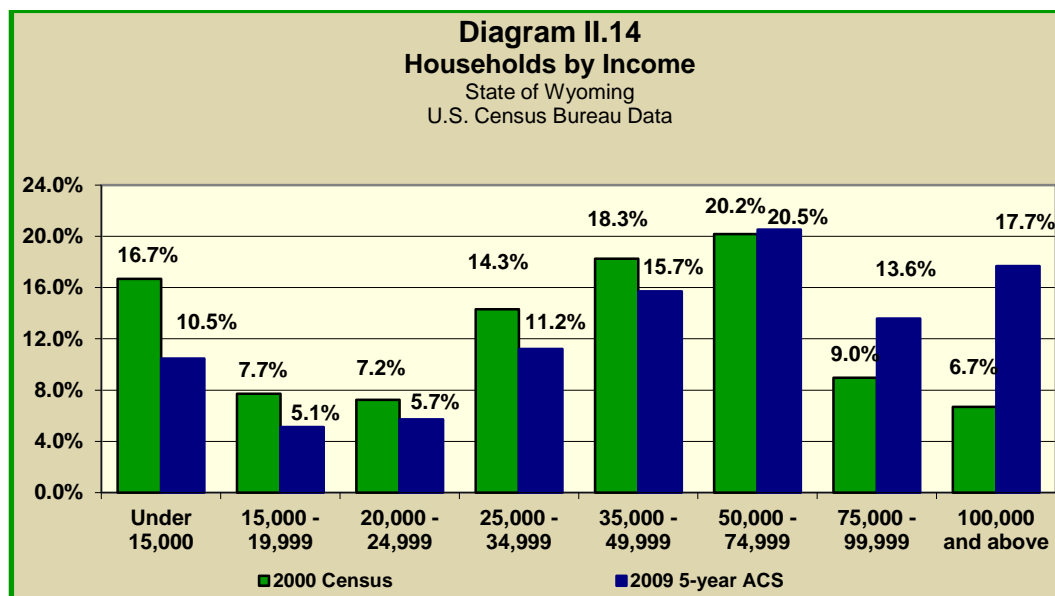
Table II.5, on the following page, presents the number of households in the State of Wyoming by income range as counted in the 2000 census and 2009 five-year ACS data. In 2000, more than 32,000 households were counted as having incomes under \$15,000 and an additional

28,984 households had incomes between \$15,000 and \$25,000. ACS data show that the percentage of low income households decreased and the percentage of upper income households increased.

Household income data for the other areas in the state showed the same trend of improving proportions of higher earning households.

Table II.5				
Households by Income				
State of Wyoming				
U.S. Census Bureau, ACS Data				
Income	2000 Census		2009 Five-Year ACS	
	Population	% of Total	Population	% of Total
City of Casper				
Under 15,000	3,450	16.9%	2,430	11.6%
15,000 - 19,999	1,543	7.6%	1,225	5.8%
20,000 - 24,999	1,558	7.6%	1,274	6.1%
25,000 - 34,999	3,185	15.6%	2,558	12.2%
35,000 - 49,999	3,680	18.0%	3,276	15.6%
50,000 - 74,999	3,948	19.3%	3,699	17.6%
75,000 - 99,999	1,772	8.7%	2,775	13.2%
100,000 and above	1,300	6.4%	3,733	17.8%
Total	20,436	100.0%	20,970	100.0%
City of Cheyenne				
Under 15,000	3,331	14.9%	2,335	10.2%
15,000 - 19,999	1,595	7.1%	1,167	5.1%
20,000 - 24,999	1,650	7.4%	1,332	5.8%
25,000 - 34,999	3,435	15.4%	2,857	12.4%
35,000 - 49,999	4,502	20.1%	4,036	17.6%
50,000 - 74,999	4,456	19.9%	4,921	21.4%
75,000 - 99,999	2,076	9.3%	3,025	13.2%
100,000 and above	1,301	5.8%	3,316	14.4%
Total	22,346	100.0%	22,989	100.0%
Remainder of State				
Under 15,000	25,571	16.9%	17,026	10.4%
15,000 - 19,999	11,804	7.8%	8,248	5.0%
20,000 - 24,999	10,834	7.2%	9,315	5.7%
25,000 - 34,999	21,107	14.0%	17,956	10.9%
35,000 - 49,999	27,235	18.0%	25,403	15.5%
50,000 - 74,999	30,722	20.3%	34,131	20.8%
75,000 - 99,999	13,544	9.0%	22,475	13.7%
100,000 and above	10,360	6.9%	29,756	18.1%
Total	151,177	100.0%	164,310	100.0%
State of Wyoming				
Under 15,000	32,352	16.7%	21,791	10.5%
15,000 - 19,999	14,942	7.7%	10,640	5.1%
20,000 - 24,999	14,042	7.2%	11,921	5.7%
25,000 - 34,999	27,727	14.3%	23,371	11.2%
35,000 - 49,999	35,417	18.3%	32,715	15.7%
50,000 - 74,999	39,126	20.2%	42,751	20.5%
75,000 - 99,999	17,392	9.0%	28,275	13.6%
100,000 and above	12,961	6.7%	36,805	17.7%
Total	193,959	100.0%	208,269	100.0%

Diagram II.14 compares 2000 census and 2005 through 2009 ACS data and demonstrates the changes in income with fewer lower income households and more higher income households.



POVERTY

The Census Bureau uses a set of income thresholds that vary by family size and composition to determine poverty status. If a family's total income is less than the threshold for their size, then that family, and every individual in it, is considered poor. The poverty thresholds do not vary geographically, but they are updated annually for inflation using the Consumer Price Index. The official poverty definition counts income before taxes and does not include capital gains and non-cash benefits, such as public housing, Medicaid and food stamps. Poverty is not defined for people in military barracks, institutional group quarters or for unrelated individuals under age 15, such as foster children.

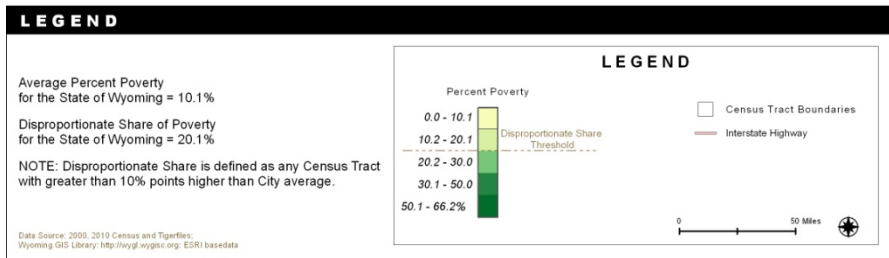
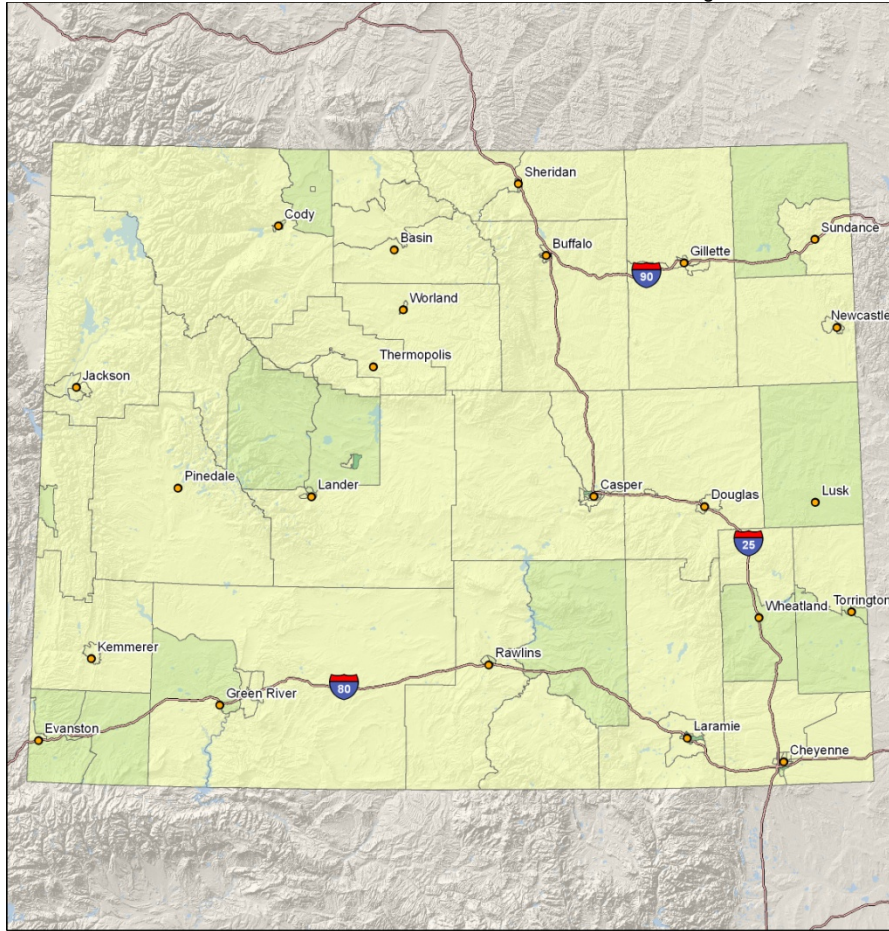
In Wyoming, the poverty rate in 2000 was 11.4 percent with 54,777 persons considered to be living in poverty, as noted in Table II.6, on the following page. This rate was slightly lower than the national average at that time of 12.4 percent. Further, the state had 6,319 children under the age of five and 4,853 persons aged 65 or older living in poverty at that time. More recent ACS data show that the percentage of persons living in poverty decreased in Wyoming to 9.6 percent and represented a greater portion of children under the age of five.

Data on poverty for the entitlement cities and the remainder of the state showed that the poverty rate in Casper and the remainder of the state was similar to the statewide figures, but poverty in Cheyenne was somewhat lower. However, while the poverty rate increased slightly over time, it decreased in Casper and the remainder of the state. In Cheyenne, poverty in 2000 represented a rate of 8.8 percent and the data average for 2005 through 2009 showed a rate of 9.0 percent. In Casper, the 2000 rate was 11.4 percent, but the rate declined slightly to 9.5 percent in the 2005 to 2009 data. The same situation was seen in the remainder of the state wherein the 2000 rate was 11.8 percent, and the 2005 to 2009 rate was 9.7 percent.

Table II.6				
Poverty by Age				
State of Wyoming				
U.S. Census Bureau, ACS Data				
Age	2000 Census		2009 Five-Year ACS	
	Population	% of Total	Population	% of Total
City of Casper				
5 and Below	836	15.1%	769	15.8%
6 to 18	1,173	21.2%	751	15.4%
18 to 64	3,072	55.4%	2,799	57.4%
65 and Older	465	8.4%	556	11.4%
Total	5,546	100.0%	4,875	100.0%
Poverty Rate	11.4%	.	9.5%	.
City of Cheyenne				
5 and Below	482	10.6%	709	14.2%
6 to 18	977	21.5%	910	18.2%
18 to 64	2,694	59.3%	3,136	62.7%
65 and Older	388	8.5%	249	5.0%
Total	4,541	100.0%	5,004	100.0%
Poverty Rate	8.8%	.	9.0%	.
Remainder of State				
5 and Below	5,001	11.2%	4,771	12.2%
6 to 18	9,746	21.8%	7,132	18.2%
18 to 64	25,943	58.1%	24,049	61.4%
65 and Older	4,000	9.0%	3,220	8.2%
Total	44,690	100.0%	39,172	100.0%
Poverty Rate	11.8%	.	9.7%	.
State of Wyoming				
5 and Below	6,319	11.5%	6,249	12.7%
6 to 18	11,896	21.7%	8,793	17.9%
18 to 64	31,709	57.9%	29,984	61.1%
65 and Older	4,853	8.9%	4,025	8.2%
Total	54,777	100.0%	49,051	100.0%
Poverty Rate	11.4%	.	9.6%	.

Poverty was not spread evenly throughout the State of Wyoming, as some census tracts had higher concentrations of poverty than others. Map II.8, shown on the following page, presents the 2009 five-year ACS poverty rate for all census tracts in the state. These data have been segmented to illustrate the census tracts that had a disproportionate share of persons living in poverty or areas where more than 19.6 percent of residents were poor. Most of the census tracts with a disproportionate share of the population living in poverty were located near Lander and Laramie.

Map II.8
Percent of Population in Poverty by Census Tract
 State of Wyoming
 U.S. Census Bureau Data, 2005 to 2009 ACS Data Averages



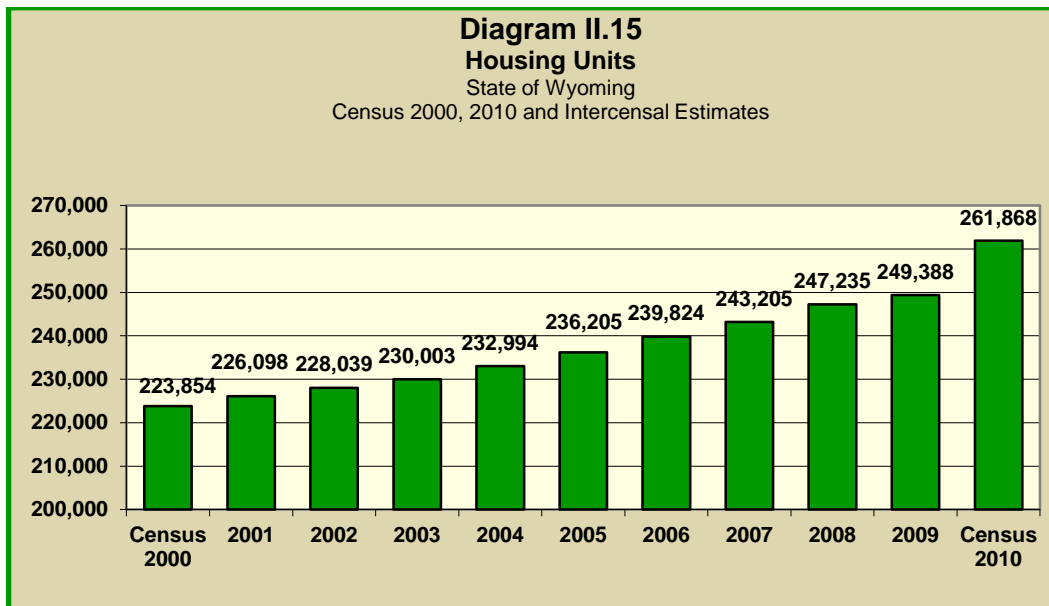
Data regarding the location of poverty in relation to employment centers and transportation services in Wyoming was only available for the two entitlement cities of Casper and Cheyenne. Maps were produced to display these geographic relationships and are presented in Appendix G. Essentially, transportation services appear to offer access to job services and provide adequate service to poverty areas.

HOUSING

Data regarding the number of housing units in the State of Wyoming for the years 2000 through 2010 are presented in Table II.7, at right. In total, the number of housing units in the state increased by 17.0 percent in this eleven-year time period from 223,854 units to 261,868 units. However, during this time the population in the state increased by only 14.0 percent, which suggests that housing production slightly outpaced population growth.

The total housing units by year for the State of Wyoming are presented below in Diagram II.15. As shown therein, most yearly totals showed a small to moderate increase from the previous year. However, in 2010 a fairly significant increase was seen in the count of housing units.

Year	Housing Units
2000	223,854
2001	226,098
2002	228,039
2003	230,003
2004	232,994
2005	236,205
2006	239,824
2007	243,205
2008	247,235
2009	249,388
2010	261,868
% Change	17.0 %



The number of persons per household in the State of Wyoming as derived from 2000 census and 2005 to 2009 ACS data is presented in Table II.8. As shown, most households in the state represented one- or two-person residences and fewer households were counted with five persons or more. Similar findings were seen in the ACS data, although decreases were seen in the percentage of households with more than five persons.

Data on the number of persons per household was also examined for Casper, Cheyenne and the remainder of the state. These data essentially mimicked data for the state, with the exception of the remainder of the state which held a higher percentage of households with a greater number of persons.

Table II.8				
Persons Per Household				
State of Wyoming				
U.S. Census Bureau Data				
Persons	2000 Census		2009 Five-Year ACS	
	Population	% of Total	Population	% of Total
City of Casper				
One Person	5,959	29.2%	6,211	29.6%
Two Person	7,269	35.6%	7,289	34.8%
Three Person	3,107	15.2%	3,295	15.7%
Four Person	2,479	12.1%	2,834	13.5%
Five Person	1,216	5.9%	936	4.5%
Six Person	271	1.3%	283	1.3%
Seven Person	136	0.7%	122	0.6%
Total	20,437	100.0%	20,970	100.0%
City of Cheyenne				
One Person	7,016	31.5%	7,487	32.6%
Two Person	7,604	34.1%	7,876	34.3%
Three Person	3,396	15.2%	3,491	15.2%
Four Person	2,694	12.1%	2,671	11.6%
Five Person	1,137	5.1%	994	4.3%
Six Person	321	1.4%	420	1.8%
Seven Person	114	0.5%	50	0.2%
Total	22,282	100.0%	22,989	100.0%
Remainder of State				
One Person	38,000	25.2%	44,128	26.9%
Two Person	54,556	36.2%	62,498	38.0%
Three Person	23,522	15.6%	24,209	14.7%
Four Person	20,538	13.6%	19,789	12.0%
Five Person	9,431	6.3%	8,779	5.3%
Six Person	3,189	2.1%	3,158	1.9%
Seven Person	1,653	1.1%	1,749	1.1%
Total	150,889	100.0%	164,310	100.0%
State of Wyoming				
One Person	50,975	26.3%	57,826	27.8%
Two Person	69,429	35.9%	77,663	37.3%
Three Person	30,025	15.5%	30,995	14.9%
Four Person	25,711	13.3%	25,294	12.1%
Five Person	11,784	6.1%	10,709	5.1%
Six Person	3,781	2.0%	3,861	1.9%
Seven Person	1,903	1.0%	1,921	0.9%
Total	193,608	100.0%	208,269	100.0%

CHARACTERISTICS OF THE HOUSING STOCK

More detailed information regarding the attributes of housing units in the state is available from 2000 census data and 2005 to 2009 ACS data. Table II.9, on the following page, shows that, as of 2000, the majority of housing units were built in the 1970s. More recent ACS data averages show that the proportion of housing units built in the 1970s was still highest, but units that were built since 2000 accounted for almost 10.0 percent of the total housing stock.

The entitlement cities and the remainder of the state showed similar patterns in data, as shown in Table II.9 on the following page.

Table II.9				
Housing Units by Vintage				
State of Wyoming				
U.S. Census Bureau Data				
Vintage	2000 Census		2009 Five-Year ACS	
	Population	% of Total	Population	% of Total
City of Casper				
1939 or earlier	2,291	11.2%	1,811	8.6%
1940 to 1949	1,346	6.6%	1,224	5.8%
1950 to 1959	4,814	23.6%	4,743	22.6%
1960 to 1969	2,416	11.8%	2,517	12.0%
1970 to 1979	5,830	28.5%	5,248	25.0%
1980 to 1989	2,904	14.2%	3,039	14.5%
1990 to 1999	836	4.1%	965	4.6%
2000 to 2004	.	.	837	4.0%
Built 2005 or Later	.	.	586	2.8%
Total	20,437	100.0%	20,970	100.0%
City of Cheyenne				
1939 or earlier	3,223	14.5%	2,728	11.9%
1940 to 1949	2,174	9.8%	1,706	7.4%
1950 to 1959	3,870	17.4%	3,880	16.9%
1960 to 1969	3,525	15.8%	3,607	15.7%
1970 to 1979	4,269	19.2%	3,871	16.8%
1980 to 1989	2,733	12.3%	2,384	10.4%
1990 to 1999	2,488	11.2%	2,234	9.7%
2000 to 2004	.	.	1,709	7.4%
Built 2005 or Later	.	.	870	3.8%
Total	22,282	100.0%	22,989	100.0%
Remainder of State				
1939 or earlier	20,199	13.4%	20,513	12.5%
1940 to 1949	9,291	6.2%	8,559	5.2%
1950 to 1959	13,601	9.0%	12,913	7.9%
1960 to 1969	13,832	9.2%	13,471	8.2%
1970 to 1979	42,816	28.4%	42,222	25.7%
1980 to 1989	28,152	18.7%	28,571	17.4%
1990 to 1999	22,998	15.2%	22,172	13.5%
2000 to 2004	.	.	10,958	6.7%
Built 2005 or Later	.	.	4,931	3.0%
Total	150,889	100.0%	164,310	100.0%
State of Wyoming				
1939 or earlier	25,713	13.3%	25,052	12.0%
1940 to 1949	12,811	6.6%	11,489	5.5%
1950 to 1959	22,285	11.5%	21,536	10.3%
1960 to 1969	19,773	10.2%	19,595	9.4%
1970 to 1979	52,915	27.3%	51,341	24.7%
1980 to 1989	33,789	17.5%	33,994	16.3%
1990 to 1999	26,322	13.6%	25,371	12.2%
2000 to 2004	.	.	13,504	6.5%
Built 2005 or Later	.	.	6,387	3.1%
Total	193,608	100.0%	208,269	100.0%

Of the 223,854 housing units reported in Wyoming in the 2000 census, about 68.5 percent were single-family units. An additional 15.9 percent of units were counted as mobile homes and 8.1 percent were apartments. ACS data regarding housing units by type in the state suggest that the proportion of unit types generally held steady in the 2005 through 2009 time period. These data are presented below in Table II.10.

Housing units by unit type data for the entitlement cities and remainder of the state are also presented in Table II.10. Census data from 2000 and 2005 to 2009 ACS data showed that the remainder of the state held a lower proportion of single-family homes and apartments as compared to Casper and Cheyenne, along with a significantly higher share of mobile homes.

Table II.10				
Housing Units by Unit Type				
State of Wyoming				
U.S. Census Bureau Data				
Unit Type	2000 Census		2009 Five-Year ACS	
	Population	% of Total	Population	% of Total
City of Casper				
Single-Family Unit	16,485	75.0%	17,421	75.4%
Duplex	521	2.4%	634	2.7%
Tri- or Four-Plex	1,211	5.5%	1,403	6.1%
Apartments	2,927	13.3%	2,794	12.1%
Mobile Homes	805	3.7%	795	3.4%
Boat, RV, Van, Etc.	29	0.1%	44	0.2%
Total	21,978	100.0%	23,091	100.0%
City of Cheyenne				
Single-Family Unit	17,145	72.0%	18,214	70.8%
Duplex	891	3.7%	803	3.1%
Tri- or Four-Plex	2,130	9.0%	3,149	12.2%
Apartments	2,800	11.8%	2,817	10.9%
Mobile Homes	814	3.4%	751	2.9%
Boat, RV, Van, Etc.	18	0.1%	10	0.0%
Total	23,798	100.0%	25,744	100.0%
Remainder of State				
Single-Family Unit	119,795	67.3%	132,351	68.1%
Duplex	4,274	2.4%	5,673	2.9%
Tri- or Four-Plex	6,858	3.9%	7,633	3.9%
Apartments	12,395	7.0%	13,888	7.1%
Mobile Homes	33,950	19.1%	34,524	17.8%
Boat, RV, Van, Etc.	806	0.5%	229	0.1%
Total	178,078	100.0%	194,298	100.0%
State of Wyoming				
Single-Family Unit	153,425	68.5%	167,986	69.1%
Duplex	5,686	2.5%	7,110	2.9%
Tri- or Four-Plex	10,199	4.6%	12,185	5.0%
Apartments	18,122	8.1%	19,499	8.0%
Mobile Homes	35,569	15.9%	36,070	14.8%
Boat, RV, Van, Etc.	853	0.4%	283	0.1%
Total	223,854	100.0%	243,133	100.0%

Housing units can also be examined by tenure status. Based on 2000 census count data, of the 223,854 total housing units counted in the state at that time, a total of 193,608 units were occupied housing units, and, of these, 70.0 percent were owner-occupied and 30.0 percent were renter-occupied. The portion of owner-occupied units was comparable to the national average of 69.0 percent at that time. A total of 30,246 housing units were vacant, as shown in Table II.11. The 2010 census count data showed that the percentage of vacant units in the state did not significantly change in the last decade.

Housing unit tenure data for the entitlement cities and the remainder of the state, shown in Table II.11, suggest that the remainder of the state held a substantially higher share of the vacant housing units than either Casper or Cheyenne in both the 2000 and 2010 data sets.

Table II.11 Housing Units by Tenure				
State of Wyoming U.S. Census Bureau Data				
Tenure	2000 Census		2010 Census	
	Units	% of Total	Units	% of Total
City of Casper				
Occupied Housing Units	20,437	93.0%	22,794	92.9%
Vacant Housing Units	1,541	7.0%	1,742	7.1%
Total Housing Units	21,978	100.0%	24,536	100.0%
City of Cheyenne				
Occupied Housing Units	22,282	93.6%	25,557	93.7%
Vacant Housing Units	1,516	6.4%	1,726	6.3%
Total Housing Units	23,798	100.0%	27,283	100.0%
Remainder of State				
Occupied Housing Units	150,889	84.7%	178,528	85.0%
Vacant Housing Units	27,189	15.3%	31,521	15.0%
Total Housing Units	178,078	100.0%	210,049	100.0%
State of Wyoming				
Occupied Housing Units	193,608	86.5%	226,879	86.6%
Vacant Housing Units	30,246	13.5%	34,989	13.4%
Total Housing Units	223,854	100.0%	261,868	100.0%

VACANT HOUSING UNITS

As shown in Table II.12 in 2000, 20.6 percent of vacant units were for rent, 10.9 percent were for sale, 6.2 percent were rented or sold but unoccupied, and 44.3 percent were for seasonal, recreational, or occasional use. However, 16.8 percent of the vacant housing stock was counted as “other vacant” units; this term refers to units that are not for sale or rent and are unavailable to the marketplace and tend to be a blighting influence. The number of vacant units as counted in the ACS data for 2005 through 2009 was 34,864, and more than 25.0 percent of these units were labeled as “other vacant.” This figure represents a significant, and possibly growing, portion of the housing stock that is unavailable to the market in the State of Wyoming.

Notably, the number of other vacant housing units in the remainder of the state showed a marked increase from 2000 census data to 2005 to 2009 ACS data averages. In 2000, the remainder of the state showed 16.0 percent of vacant units as other vacant units, but the 2009 ACS data showed a percentage of 24.7 percent. As for the two entitlement cities, Cheyenne's share of other vacant units showed a small decrease over the time period, but Casper's share of other vacant units more than doubled.

Table II.12				
Disposition of Vacant Housing Units				
State of Wyoming				
U.S. Census Bureau Data				
Disposition	2000 Census		2009 Five-Year ACS	
	Population	% of Total	Population	% of Total
City of Casper				
For Rent	620	40.2%	419	19.8%
For Sale	249	16.2%	272	12.8%
Rented or Sold, Not Occupied	183	11.9%	383	18.1%
For Seasonal, Recreational, or Occasional Use	177	11.5%	132	6.2%
For Migrant Workers	0	0.0%	0	0.0%
Other Vacant	312	20.2%	915	43.1%
Total	1,541	100.0%	2,121	100.0%
City of Cheyenne				
For Rent	644	42.5%	803	29.1%
For Sale	243	16.0%	545	19.8%
Rented or Sold, Not Occupied	97	6.4%	285	10.3%
For Seasonal, Recreational, or Occasional Use	117	7.7%	540	19.6%
For Migrant Workers	0	0.0%	0	0.0%
Other Vacant	415	27.4%	582	21.1%
Total	1,516	100.0%	2,755	100.0%
Remainder of State				
For Rent	4,973	18.3%	2,834	9.5%
For Sale	2,790	10.3%	2,019	6.7%
Rented or Sold, Not Occupied	1,589	5.8%	2,304	7.7%
For Seasonal, Recreational, or Occasional Use	13,107	48.2%	15,122	50.4%
For Migrant Workers	376	1.4%	314	1.0%
Other Vacant	4,354	16.0%	7,395	24.7%
Total	27,189	100.0%	29,988	100.0%
State of Wyoming				
For Rent	6,237	20.6%	4,056	11.6%
For Sale	3,282	10.9%	2,836	8.1%
Rented or Sold, Not Occupied	1,869	6.2%	2,972	8.5%
For Seasonal, Recreational, or Occasional Use	13,401	44.3%	15,794	45.3%
For Migrant Workers	376	1.2%	314	0.9%
Other Vacant	5,081	16.8%	8,892	25.5%
Total	30,246	100.0%	34,864	100.0%

HOUSING PROBLEMS

While the 2000 census did not report significant details regarding the physical condition of housing units, some information can be derived from the one in six sample, also called SF3 data.⁷ These data relate to overcrowding, incomplete plumbing or kitchen facilities, and cost burdens.

Overcrowding is defined as having more than one person per room per residence, and severe overcrowding is defined as having more than 1.5 people per room. At the time that the 2000 census was taken, 3,562 or 1.8 percent of households were overcrowded and another 1,654 or 0.9 percent of units were severely overcrowded, as shown in Table II.13. This housing problem was far more prevalent in renter households as compared to owner households. For example, renter households experienced a rate of overcrowding of 3.0 percent as compared to 1.3 percent for owners. Similar figures were found in the ACS data for overcrowding although the rates were shown to have fallen in all cases.

In the entitlement and non-entitlement areas of the state, the overcrowding and severe overcrowding rates varied. For the remainder of the state, the 2000 census overcrowding and severe overcrowding rates were 2.1 and 0.9 percent, respectively, and the 2005 to 2009 ACS overcrowding and severe overcrowding rates were 1.5 and 0.5 percent, respectively. Overcrowding rates in Cheyenne stayed the same at 0.9 percent in both census and ACS data, but severe overcrowding rates declined from 0.7 percent to 0.0 percent. In Casper, overcrowding existed at a rate of 1.0 percent in the 2000 data and 0.5 percent in the 2005 to 2009 data and severe overcrowding was seen at a rate of 0.7 percent in the 2000 data and 0.1 percent in the 2005 to 2009 data. In nearly all cases both overcrowding and severe overcrowding were more problematic for renters than homeowners.

⁷ Summary File 3 (SF3) consists of 813 detailed tables of 2000 census social, economic and housing characteristics compiled from a sample of approximately 19 million housing units (about 1 in 6 households) that received the 2000 census long-form questionnaire. Source: <http://www.census.gov/Press-Release/www/2002/sumfile3.html>. These sample data include sampling error and may not sum precisely to the 100 percent sample typically presented in the 2000 census.

**Table II.13
Overcrowding and Severe Overcrowding**

State of Wyoming
U.S. Census Bureau Data

	No Overcrowding		Overcrowding		Severe Overcrowding		Total
	Households	%	Households	%	Households	%	
City of Casper							
Owner							
2000 Census	13,668	99.2%	53	0.4%	58	0.4%	13,779
2009 Five-Year ACS	14,067	99.5%	65	0.5%	0	0.0%	14,132
Renter							
2000 Census	6,418	96.4%	154	2.3%	86	1.3%	6,658
2009 Five-Year ACS	6,782	99.2%	36	0.5%	20	0.3%	6,838
Total							
2000 Census	20,086	98.3%	207	1.0%	144	0.7%	20,437
2009 Five-Year ACS	20,849	99.4%	101	0.5%	20	0.1%	20,970
City of Cheyenne							
Owner							
2000 Census	14,641	99.3%	65	0.4%	39	0.3%	14,745
2009 Five-Year ACS	14,770	99.0%	143	1.0%	0	0.0%	14,913
Renter							
2000 Census	7,292	96.7%	138	1.8%	107	1.4%	7,537
2009 Five-Year ACS	8,016	99.3%	60	0.7%	0	0.0%	8,076
Total							
2000 Census	21,933	98.4%	203	0.9%	146	0.7%	22,282
2009 Five-Year ACS	22,786	99.1%	203	0.9%	0	0.0%	22,989
Remainder of State							
Owner							
2000 Census	104,696	97.9%	1,688	1.6%	580	0.5%	106,964
2009 Five-Year ACS	114,887	98.6%	1,356	1.2%	297	0.3%	116,540
Renter							
2000 Census	41,677	94.9%	1,464	3.3%	784	1.8%	43,925
2009 Five-Year ACS	46,157	96.6%	1,155	2.4%	458	1.0%	47,770
Total							
2000 Census	146,373	97.0%	3,152	2.1%	1,364	0.9%	150,889
2009 Five-Year ACS	161,044	98.0%	2,511	1.5%	755	0.5%	164,310
State of Wyoming							
Owner							
2000 Census	133,005	98.2%	1,806	1.3%	677	0.5%	135,488
2009 Five-Year ACS	143,724	98.7%	1,564	1.1%	297	0.2%	145,585
Renter							
2000 Census	55,387	95.3%	1,756	3.0%	977	1.7%	58,120
2009 Five-Year ACS	60,955	97.2%	1,251	2.0%	478	0.8%	62,684
Total							
2000 Census	188,392	97.3%	3,562	1.8%	1,654	0.9%	193,608
2009 Five-Year ACS	204,679	98.3%	2,815	1.4%	775	0.4%	208,269

Incomplete plumbing and kitchen facilities are another indicator of potential housing problems. According to the Census Bureau, a housing unit is classified as lacking complete plumbing facilities when any of the following are not present: piped hot and cold water, a flush toilet, and a bathtub or shower. Likewise, a unit is categorized as deficient when any of the following are missing from the kitchen: a sink with piped hot and cold water, a range or cook top and oven, and a refrigerator.

At the time of the 2000 census, a total of 4,309 units or 1.9 percent of all households in Wyoming were lacking complete plumbing facilities. The 2005 through 2009 ACS data average showed an increase in the percentage of units with incomplete plumbing facilities to 2.6 percent. These data are presented in Table II.14.

Data on incomplete plumbing facilities for the entitlement cities and the remainder of the state are also presented in Table II.14. In total, the entitlement cities experienced a lesser degree of housing units with incomplete plumbing facilities, around 0.5 percent, as compared to the remainder of the state, with a rate of 2.3 percent. The more recent ACS data suggests that the rate of units with incomplete plumbing facilities increased in the remainder of the state but held relatively steady in the two entitlement cities.

Table II.14		
Housing Units with Incomplete Plumbing Facilities		
State of Wyoming		
U.S. Census Bureau Data		
Facilities	2000 Census	2009 Five-Year ACS
	Population	Population
City of Casper		
Plumbing Facilities		
Complete Plumbing Facilities	21,839	22,946
Lacking Complete Plumbing Facilities	139	145
Total Households	21,978	23,091
Percent Lacking	0.6%	0.6%
City of Cheyenne		
Plumbing Facilities		
Complete Plumbing Facilities	23,714	25,660
Lacking Complete Plumbing Facilities	84	84
Total Households	23,798	25,744
Percent Lacking	0.4%	0.3%
Remainder of State		
Plumbing Facilities		
Complete Plumbing Facilities	173,992	188,313
Lacking Complete Plumbing Facilities	4,086	5,985
Total Households	178,078	194,298
Percent Lacking	2.3%	3.1%
State of Wyoming		
Plumbing Facilities		
Complete Plumbing Facilities	219,545	236,919
Lacking Complete Plumbing Facilities	4,309	6,214
Total Households	223,854	243,133
Percent Lacking	1.9%	2.6%

Table II.15 shows the number of housing units with incomplete kitchen facilities in the State of Wyoming. The 2000 census and 2009 ACS data showed that a higher percentage of units were found to have incomplete kitchen facilities as compared to plumbing facilities with 2.2 percent of total units counted with this classification in the census count and 3.2 percent of units counted in the ACS data.

The entitlement cities and the remainder of the state also generally showed higher rates of units missing complete kitchen facilities as opposed to plumbing facilities. In Casper, 0.9 percent of units in the 2000 census data and 1.8 percent of units in the 2009 ACS data lacked complete kitchen facilities, and in Cheyenne, 0.8 percent of units in the 2000 census data and 1.2 percent of units in the 2009 ACS data showed a lack of complete kitchen facilities. In the remainder of the state, these rates were much higher; 2.6 percent of units lacked complete kitchen facilities in the 2000 census data and 3.7 percent of units lacked complete kitchen facilities in the 2009 ACS data. These figures are presented below in Table II.15.

Table II.15		
Housing Units with Incomplete Kitchen Facilities		
State of Wyoming		
U.S. Census Bureau Data		
Facilities	2000 Census	2009 Five-Year ACS
	Population	Population
City of Casper		
Kitchen Facilities		
Complete Kitchen Facilities	21,776	22,682
Lacking Complete Kitchen Facilities	202	409
Total Households	21,978	23,091
Percent Lacking	0.9%	1.8%
City of Cheyenne		
Kitchen Facilities		
Complete Kitchen Facilities	23,604	25,427
Lacking Complete Kitchen Facilities	194	317
Total Households	23,798	25,744
Percent Lacking	0.8%	1.2%
Remainder of State		
Kitchen Facilities		
Complete Kitchen Facilities	173,440	187,168
Lacking Complete Kitchen Facilities	4,638	7,130
Total Households	178,078	194,298
Percent Lacking	2.6%	3.7%
State of Wyoming		
Kitchen Facilities		
Complete Kitchen Facilities	218,820	235,277
Lacking Complete Kitchen Facilities	5,034	7,856
Total Households	223,854	243,133
Percent Lacking	2.2%	3.2%

The third type of housing problem reported in the 2000 census is cost burden. Cost burden is defined as gross housing costs that range from 30.0 to 50.0 percent of gross household income; severe cost burden is defined as gross housing costs that exceed 50.0 percent of gross household income. For homeowners, gross housing costs include property taxes, insurance, energy payments, water and sewer service, and refuse collection. If the homeowner has a mortgage, the determination also includes principal and interest payments on the mortgage loan. For renters, this figure represents monthly rent and selected electricity and natural gas energy charges.

Table II.16 shows that in the State of Wyoming, 12.9 percent of households had a cost burden and 8.0 percent of households had a severe cost burden in 2000. These figures compared very favorably to the national average of 20.8 percent and 19.1 percent at that time, respectively. Roughly 14.2 percent of homeowners with a mortgage experienced a cost burden and 6.5 percent experienced a severe cost burden, while 16.8 percent of renters had a cost burden and 12.9 percent had a severe cost burden. ACS data averages for 2005 through 2009 show that the overall percentage of owners and renters with a cost burden or severe cost burden increased as compared to 2000 census data, but this was particularly true for homeowners with a mortgage in the state.

Similar findings were seen in the entitlement cities and in the non-entitlement cities in the state. However, a greater rate of cost burden was seen in the City of Cheyenne and a greater percentage of severe cost burden was seen in the remainder of the state. Unfortunately, in many cases the rates of cost burden and severe cost burden were shown to have increased over time and in some cases the increase was substantial. For example, the rate of severe cost burden for renters in Casper increased from 11.3 percent to 19.8 percent.

Table II.16
Cost Burden and Severe Cost Burden by Tenure

State of Wyoming
U.S. Census Bureau Data

Census	Less Than 30.0%		31% - 50%		Above 50%		Not Computed		Total
	Households	%	Households	%	Households	%	Households	%	
City of Casper									
Owner With a Mortgage									
2000 Census	6,896	81.4%	1,066	12.6%	461	5.4%	49	0.6%	8,472
2009 Five-Year ACS	7,162	78.4%	1,447	15.8%	511	5.6%	18	0.2%	9,138
Owner Without a Mortgage									
2000 Census	3,973	95.3%	73	1.8%	84	2.0%	40	1.0%	4,170
2009 Five-Year ACS	4,605	92.2%	247	4.9%	92	1.8%	50	1.0%	4,994
Renter									
2000 Census	4,361	65.6%	1,162	17.5%	748	11.3%	374	5.6%	6,645
2009 Five-Year ACS	3,836	56.1%	1,395	20.4%	1,354	19.8%	253	3.7%	6,838
Total									
2000 Census	15,230	79.0%	2,301	11.9%	1,293	6.7%	463	2.4%	19,287
2009 Five-Year ACS	15,603	74.4%	3,089	14.7%	1,957	9.3%	321	1.5%	20,970
City of Cheyenne									
Owner With a Mortgage									
2000 Census	7,267	77.0%	1,593	16.9%	555	5.9%	19	0.2%	9,434
2009 Five-Year ACS	7,447	70.1%	2,403	22.6%	762	7.2%	8	0.1%	10,620
Owner Without a Mortgage									
2000 Census	3,655	92.4%	161	4.1%	95	2.4%	44	1.1%	3,955
2009 Five-Year ACS	3,944	91.9%	226	5.3%	116	2.7%	7	0.2%	4,293
Renter									
2000 Census	4,616	61.5%	1,532	20.4%	997	13.3%	356	4.7%	7,501
2009 Five-Year ACS	4,777	59.2%	1,354	16.8%	1,474	18.3%	471	5.8%	8,076
Total									
2000 Census	15,538	74.4%	3,286	15.7%	1,647	7.9%	419	2.0%	20,890
2009 Five-Year ACS	16,168	70.3%	3,983	17.3%	2,352	10.2%	486	2.1%	22,989
Remainder of State									
Owner With a Mortgage									
2000 Census	35,416	78.9%	6,280	14.0%	3,065	6.8%	142	0.3%	44,903
2009 Five-Year ACS	51,447	73.8%	11,649	16.7%	6,422	9.2%	154	0.2%	69,672
Owner Without a Mortgage									
2000 Census	22,718	92.1%	981	4.0%	732	3.0%	226	0.9%	24,657
2009 Five-Year ACS	42,378	90.4%	2,657	5.7%	1,637	3.5%	196	0.4%	46,868
Renter									
2000 Census	24,060	57.8%	6,693	16.1%	5,434	13.0%	5,460	13.1%	41,647
2009 Five-Year ACS	26,869	56.2%	7,353	15.4%	6,375	13.3%	7,173	15.0%	47,770
Total									
2000 Census	82,194	73.9%	13,954	12.5%	9,231	8.3%	5,828	5.2%	111,207
2009 Five-Year ACS	120,694	73.5%	21,659	13.2%	14,434	8.8%	7,523	4.6%	164,310
State of Wyoming									
Owner With a Mortgage									
2000 Census	49,579	78.9%	8,939	14.2%	4,081	6.5%	210	0.3%	62,809
2009 Five-Year ACS	66,056	73.9%	15,499	17.3%	7,695	8.6%	180	0.2%	89,430
Owner Without a Mortgage									
2000 Census	30,346	92.6%	1,215	3.7%	911	2.8%	310	0.9%	32,782
2009 Five-Year ACS	50,927	90.7%	3,130	5.6%	1,845	3.3%	253	0.5%	56,155
Renter									
2000 Census	33,037	59.2%	9,387	16.8%	7,179	12.9%	6,190	11.1%	55,793
2009 Five-Year ACS	35,482	56.6%	10,102	16.1%	9,203	14.7%	7,897	12.6%	62,684
Total									
2000 Census	112,962	74.6%	19,541	12.9%	12,171	8.0%	6,710	4.4%	151,384
2009 Five-Year ACS	152,465	73.2%	28,731	13.8%	18,743	9.0%	8,330	4.0%	208,269

People who experience a severe cost burden are at risk of homelessness. For example, cost-burdened renters who experience one financial setback are likely to have to choose between rent and food or rent and healthcare for their family. Similarly, such homeowners with a mortgage and just one unforeseen financial constraint, such as temporary illness, divorce or the loss of employment, may be forced to face foreclosure or bankruptcy. Furthermore, households that no longer have a mortgage yet still experience a severe cost burden may be unable to conduct periodic maintenance and repair of their home and in turn contribute to a dilapidation and blight problem. All three of these situations should be of concern to policy makers and program managers.

SUMMARY

According to the U.S. Census Bureau, between 2000 and 2010 the population in the State of Wyoming increased substantially from 493,782 to 563,626 persons or by 14.1 percent. ACS data for population by age, representing a 2005 to 2009 average, show that most persons in the state were between the ages of 35 and 54, but a significant number of persons also fell in the prime working age group of 25 to 34. Similar patterns in age distribution were seen in the two entitlement cities of Casper and Cheyenne and in the remainder of the state.

In terms of race, the white population in the state grew by the largest total amount of persons but fell in total share of population between 2000 and 2010 from 92.1 percent to 90.7 percent. All other racial groups showed small gains in population of less than 0.5 percent each. However, the Hispanic ethnic population grew from 6.4 percent of the population in 2000 to 8.9 percent of the population in 2010. The remainder of the state showed a 2.5 percent increase in the Hispanic population from 2000 to 2010, while Casper and Cheyenne both showed an increase of 2.0 percent. Some racial and ethnic populations were geographically concentrated in certain areas of the state, specifically near cities such as Jackson, Green River, and Rawlins where a few census tracts showed more than 25.0 percent of the population as Hispanic. Comparison of 2000 and 2010 maps showed that some of these concentrations have been increasing.

At the time of the 2000 census, the state had a disability rate of 17.1 percent, which was slightly lower than the 19.0 percent national rate at that time. The remainder of the state was found to have a slightly smaller share of the disabled population as compared to Cheyenne and Casper. The disabled population was somewhat concentrated in a few areas in the remainder of the state, such as near the City of Torrington.

Data from the Bureau of Labor Statistics suggested that the labor force in Wyoming, defined as people either working or looking for work, fell only slightly to 293,769 persons between 2008 and 2009, but total employment figures dropped significantly to 273,313 persons. As a result of the increasing labor force and decreasing employment, the unemployment rate increased to 6.4 percent by the end of 2010. Unemployment rates were similar in the entitlement cities in the state. Data from the Bureau of Economic Analysis showed that average earnings per job in Wyoming have been stronger than national figures with the state average almost \$5,000 greater than the national average in 2009.

In Wyoming, the average poverty rate for 2005 through 2009 was 9.6 percent with nearly 50,000 persons considered to be living in poverty. Poverty rates were found to be similar across the entitlement cities and the remainder of Wyoming, although some census tracts with disproportionate shares of the disabled population were found near Lander and Laramie.

The number of housing units in the State of Wyoming increased by 17.0 percent between 2000 and 2010. Of the 223,854 housing units reported in the 2000 census, about 68.5 percent were single-family units, and more recent data from the ACS showed that this percentage held steady. A smaller share of single-family units and a larger share of mobile homes were found in the remainder of the state as compared to the entitlement cities. A total of 193,609 units in the state at the time of the 2000 census were occupied housing units, and, of these, 70.0 percent were owner-occupied and 30.0 percent were renter-occupied. Of the unoccupied housing units counted in the state in 2000, 5,081 were noted to be “other vacant” units that are not available to the marketplace and tend to contribute to blighting influences; more recent data show that the percentage of this type of vacant unit is increasing in the state.

At the time that the 2000 census was taken, 1.8 percent of households in Wyoming were overcrowded and another 0.9 percent of households were severely overcrowded, but 2009 five-year ACS data show that the statewide percentage of units with this housing problem may be decreasing. However, the remainder of the state generally showed higher levels of crowding and severe overcrowding than Casper or Cheyenne for both renter and owner households. In Wyoming, 1.9 and 2.2 percent of all households were lacking complete plumbing or kitchen facilities, respectively, at the time of the 2000 census but this housing problem was shown to have worsened in more recent data in both the entitlement and non-entitlement areas of the state. Additionally, in 2000 12.9 percent of households had a cost burden and 8.0 percent of households had a severe cost burden, but the 2009 ACS data showed that both of these percentages increased since that time but this was especially true for homeowners with a mortgage. Similar findings were seen for Casper, Cheyenne and the remainder of Wyoming, and in some cases the increase in share of renters or homeowners with a cost burden or severe cost burden was substantial.

SECTION III. REVIEW OF THE FAIR HOUSING PROFILE

The purpose of this section is to provide a profile of fair housing in the state including: an enumeration of key agencies and organizations contributing to affirmatively furthering fair housing in the State of Wyoming, evaluation of presence and scope of services of existing fair housing organizations, a review of the complaint process, and analysis of national and local fair housing studies and cases.

FAIR HOUSING ORGANIZATIONS

THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

The United States Department of Housing and Urban Development (HUD) oversees, administers and enforces the Fair Housing Act. HUD's regional office in Denver, Colorado, oversees housing, community development and fair housing enforcement in Wyoming, as well as Colorado, Montana, North Dakota, South Dakota, and Utah.⁸ The Office of Fair Housing and Equal Opportunity (FHEO) within HUD's Denver office enforces the federal Fair Housing Act and other civil rights laws that prohibit discrimination in housing, mortgage lending and other related transactions in Wyoming. HUD also provides education and outreach, monitors agencies that receive HUD funding for compliance with civil rights laws, and works with state and local agencies under the Fair Housing Assistance Program and Fair Housing Initiative Program, as described below.

Fair Housing Assistance Program

In the U.S., many agencies receive funding directly from HUD as Fair Housing Assistance Program (FHAP) recipients. FHAP recipients require an ordinance or law that empowers a state or local governmental agency to enforce the state or local fair housing laws; if HUD determines that the local entity can operate on a "substantially equivalent" level to federal agency enforcement activities, HUD contracts with that agency to process federal fair housing complaints and reimburses the jurisdiction on a per case basis.⁹ FHAP grants are given to public, not private, entities and are given on a noncompetitive, annual basis to substantially equivalent state and local fair housing enforcement agencies.

To create a substantially equivalent agency, a state or local jurisdiction must first enact a fair housing law that is substantially equivalent to federal laws. In addition, the local jurisdiction must have both the administrative capability and fiscal ability to carry out the law. With these elements in place, the jurisdiction may apply to HUD in Washington D.C. for substantially equivalent status. The jurisdiction's law would then be examined, and the federal government would make a determination as to whether it was substantially equivalent to federal fair housing law.

⁸ <http://www.hud.gov/offices/fheo/aboutfheo/fhhubs.cfm#hdcent>

⁹ <http://www.hud.gov/offices/fheo/progdesc/title8.cfm>

When substantially equivalent status has been granted, complaints of federal housing discrimination are dually filed with the state or local agency and HUD. The state or local agency investigates most complaints. However, when federally subsidized housing is involved, HUD will typically investigate the complaint. Still, the state or local agencies are reimbursed for complaint intake and investigation and are awarded funds for fair housing training and education.

Fair Housing Initiative Program

A Fair Housing Initiative Program (FHIP) participant may be a government agency, a private non-profit or a for-profit organization. FHIPs are funded through a competitive grant program that provides funds to organizations to carry out projects and activities designed to enforce and enhance compliance with fair housing laws. Eligible activities include education and outreach to the public and the housing industry on fair housing rights and responsibilities, as well as enforcement activities in response to fair housing complaints, including testing and litigation. The following FHIP initiatives provide funds and competitive grants to eligible organizations:

The Fair Housing Organizations Initiative (FHOI) provides funding that builds the capacity and effectiveness of non-profit fair housing organizations by providing funds to handle fair housing enforcement and education initiatives more effectively. FHOI also strengthens the fair housing movement nationally by encouraging the creation and growth of organizations that focus on the rights and needs of underserved groups, particularly people with disabilities.

Grantee eligibility:

Applicants must be qualified fair housing enforcement organizations with at least two years of experience in complaint intake, complaint investigation, testing for fair housing violations, and meritorious claims in the three years prior to the filing of their application.

Eligible activities:

The basic operation and activities of new and existing non-profit organizations.

The Private Enforcement Initiative (PEI) offers a range of assistance to the nationwide network of fair housing groups. This initiative funds non-profit fair housing organizations to carry out testing and enforcement activities to prevent or eliminate discriminatory housing practices.

Grantee eligibility:

Fair housing enforcement organizations that meet certain requirements related to the length and quality of previous fair housing enforcement experience may apply for FHIP-PEI funding.

Eligible activities:

Conducting complaint-based and targeted testing investigations of housing discrimination, linking fair-housing organizations in regional enforcement activities, and establishing effective means of meeting legal expenses in support of litigation.

The Education and Outreach Initiative (EOI) offers a comprehensive range of support for fair housing activities, providing funding to state and local government agencies and non-profit organizations for initiatives that explain to the general public and housing providers

what equal opportunity in housing means and what housing providers need to do to comply with the Fair Housing Act.

Grantee eligibility:

State or local governments, qualified fair housing enforcement organizations (those with at least two years of experience), other fair housing organizations, and other public or private nonprofit organizations representing groups of people protected by the Fair Housing Act may apply for FHIP-EOI funding.

Eligible activities:

A broad range of educational activities that can be national, regional, local or community-based in scope. Activities may include developing education materials, providing housing counseling and classes, convening meetings that bring together the housing industry with fair housing groups, developing technical materials on accessibility, and mounting public information campaigns. National projects that demonstrate cooperation with the real estate industry or focus on resolving the community tensions that arise as people expand their housing choices may be eligible to receive preference points.

The Administrative Enforcement Initiative (AEI) helps state and local governments who administer laws that include rights and remedies similar to those in the Fair Housing Act implement specialized projects that broaden an agency's range of enforcement and compliance activities. No funds are available currently for this program.

While the State of Wyoming was served from 2000 through 2005 by Wyoming Fair Housing, which offered fair housing outreach and education services to consumers and providers of housing in the state and also accepted fair housing complaints, Wyoming currently has no FHIP or FHAP organizations in operation within the state.

COMPLAINT AND COMPLIANCE REVIEW

A myriad of federal laws provide the backbone for fair housing regulations in the U.S. While some laws have already been discussed previously in this report, a brief review of laws related to fair housing as presented on the HUD website¹⁰ is presented below.

FAIR HOUSING LAW REVIEW

Fair Housing Act. Title VIII of the Civil Rights Act of 1968, also known as the federal Fair Housing Act, as amended prohibits discrimination in the sale, rental and financing of dwellings and in other housing-related transactions based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and handicap (disability).

Title VI of the Civil Rights Act of 1964. Title VI prohibits discrimination on the basis of race, color or national origin in programs and activities receiving federal assistance.

¹⁰ <http://www.hud.gov/offices/ftheo/FHLaws/index.cfm>

Section 504 of the Rehabilitation Act of 1973. Section 504 prohibits discrimination based on disability in any program or activity receiving federal housing assistance.

Section 109 of Title I of the Housing and Community Development Act of 1974. Section 109 prohibits discrimination on the basis of race, color, national origin, sex or religion in programs and activities receiving financial assistance from HUD's Community Development and Block Grant program.

Title II of the Americans with Disabilities Act of 1990. Title II of the Americans with Disabilities Act of 1990 prohibits discrimination based on disability in programs, services and activities provided or made available by public entities. HUD enforces Title II when it relates to state and local public housing, housing assistance and housing referrals.

Architectural Barriers Act of 1968. The Architectural Barriers Act of 1968 requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 must be accessible to and useable by handicapped persons.

Age Discrimination Act of 1968. The Age Discrimination Act of 1968 prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance.

Title IX of the Education Amendments Act of 1972. Title IX prohibits discrimination on the basis of sex in education programs or activities that receive federal financial assistance.

Wyoming Legislative Initiatives

As mentioned previously, Wyoming has no established statewide fair housing law. Some attempts have been made in the past to create and establish a fair housing law substantially equivalent to the federal Fair Housing Act, such as in 2005 when the Wyoming Fair Housing Act was proposed or in 2007 when the Act was again introduced, but both of these bills died in committee.

COMPLAINT PROCESS FOR THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

According to the HUD website, any person who feels their housing rights have been violated may submit a complaint to HUD via phone, mail or the Internet. A complaint can be submitted to the national HUD office at:

Office of Fair Housing and Equal Opportunity
Department of Housing and Urban Development
451 Seventh St. SW, Room 5204
Washington, DC 20410-2000
(202) 708-1112
1-800-669-9777
<http://www.hud.gov/offices/fheo/online-complaint.cfm>

In Wyoming, the contact information for the regional HUD office in Denver is:

Denver Regional Office of FHEO
U.S. Department of Housing and Urban Development

1670 Broadway
Denver, CO 80202-4801
(303) 672-5437
(800) 877-7353

There is also a field office located in the Wyoming in the City of Casper. The address and contact information for the office in Casper is as follows:

Casper Field Office
150 East B Street
Room 1010
Casper, WY 82601-1969
(307) 261-6250

When a complaint is submitted, intake specialists review the information and contact the complainant in order to gather additional details and determine if the case qualifies as possible housing discrimination. Complaints that are specific to a state or locality that is part of HUD's FHAP organizations are referred to the appropriate parties who have 30 days to address the complaint. If HUD is handling the case, the formal complaint is sent to the complainant for review and is then sent to the alleged violator for review and response.

Next, the circumstances of the complaint are investigated through conducting interviews and examining relevant documents. During this time, the investigator attempts to rectify the situation through conciliation, if possible.

The case is closed if conciliation of the two parties is achieved or if the investigator determines that there was no reasonable cause of discrimination. If reasonable cause is found, then either a federal judge or a HUD Administrative Law Judge hears the case and determines damages, if any.¹¹ A respondent may be ordered:

- To compensate for actual damages, including humiliation, pain and suffering.
- To provide injunctive or other equitable relief to make the housing available.
- To pay the Federal Government a civil penalty to vindicate the public interest. The maximum penalties are \$10,000 for a first violation and \$50,000 for an additional violation within seven years.
- To pay reasonable attorney's fees and costs.¹²

RELATED NATIONAL AND STATEWIDE FAIR HOUSING STUDIES

NATIONAL FAIR HOUSING STUDIES AND ARTICLES

In 2000, the United States Department of Housing and Urban Development (HUD) released a publication entitled "Discrimination in Metropolitan Housing Markets" (HDS2000), measuring the prevalence of housing discrimination based on race or color in the U.S. The third nationwide effort to measure discrimination against minority home seekers since 1977,

¹¹ <http://www.hud.gov/offices/fheo/complaint-process.cfm>

¹² <http://www.hud.gov/offices/fheo/FHLaws/yourrights.cfm>

HDS2000 measured discrimination in metropolitan areas with populations greater than 100,000 and with significant black, Hispanic and/or Native American minorities. The study found that discrimination persists in both rental and sales markets of large metropolitan areas nationwide, but that its incidence has generally declined since 1989. The exception was for Hispanic renters, who faced essentially the same incidence of discrimination in 2000 as they did in 1989.

In April 2002, HUD released, “How Much Do We Know?,” a national study which assessed public awareness of and support for fair housing law. The study found that only one-half of the general public was able to identify six or more of eight scenarios describing illegal conduct. In addition, 14.0 percent of the nationwide survey’s adult participants believed that they had experienced some form of housing discrimination in their lifetime. However, only 17.0 percent of those who had experienced housing discrimination had done something about it. Last, two-thirds of all respondents said that they would vote for a fair housing law.¹³

As a follow-up, HUD later released a study in February 2006 called “Do We Know More Now? Trends in Public Knowledge, Support and Use of Fair Housing Law.” One aim of the study was to determine whether a nationwide media campaign had proven effective in increasing the public’s awareness of housing discrimination, as well as its desire to report such discrimination. Unfortunately, the study found that overall public knowledge of fair housing laws had not improved between 2000 and 2005. As before, just half of the public knew the law with respect to six or more illegal housing activities. In the 2006 report, 17.0 percent of the study’s adult participants claimed to have experienced discrimination when seeking housing; however, after reviewing descriptions of the perceived discrimination, it was determined that only about 8.0 percent of the situations might be covered by the Fair Housing Act. Four out of five individuals who felt they had been discriminated against did not file a fair housing complaint, indicating that they felt it “wasn’t worth it” or that it “wouldn’t have helped.” Others didn’t know where to complain, assumed it would cost too much, were too busy or feared retribution.¹⁴ One positive finding of the survey was that public support for fair housing laws increased from 66.0 percent in 2000 to 73.0 percent in 2005.

In 2004, the U.S. General Accounting Office’s (GAO) released a report titled “Fair Housing: Opportunities to Improve HUD’s Oversight and Management of the Enforcement Process.” The GAO report found that, although the process had improved in recent years, between 1996 and 2003 the median number of days required to complete fair housing complaint investigations was 259 for HUD’s Fair Housing and Equal Opportunity Offices and 195 for FHAP agencies. The report did find a higher percentage of investigations completed within the FHA’s 100-day mandate.¹⁵ The GAO report also identified the following trends between 1996 and 2003:

- The number of fair housing complaints filed each year steadily increased since 1998. An increasing proportion of grievances alleged discrimination based on disability, and a declining proportion alleged discrimination based on race, though race was still the most cited basis of housing discrimination over the period.

¹³ *How Much Do We Know?* United States Department of Housing and Urban Development, Office of Policy Development and Research, 2002. Document available at <http://www.huduser.org/Publications>.

¹⁴ *Do We Know More Now?* United States Department of Housing and Urban Development, Office of Policy Development and Research, 2006. Document available at <http://www.huduser.org/Publications>.

¹⁵ *Fair Housing: Opportunities to Improve HUD’s Oversight and Management of the Enforcement Process*, United States General Accounting Office, Report to Congressional Requesters, April 2004.

- FHAP agencies conducted more fair housing investigations than FHEO agencies over the eight-year period. The total number of investigations completed each year increased somewhat after declining in 1997 and 1998.
- Investigation outcomes changed during this time, and an increasing percentage closed without a finding of reasonable cause to believe discrimination occurred. A declining percentage of investigations were resolved by the parties themselves or with help from FHEO or FHAP agencies.

Released by the Poverty and Race Research Action Council in January 2008, “Residential Segregation and Housing Discrimination in the United States” asserts that many current governmental efforts to further fair housing actually result in furthering unfair housing practices across the U.S. This article suggests that fair housing efforts can cause residential segregation. For example, the majority of public housing residents are non-white and most public housing accommodations are grouped in the same census tracts, which results in residential segregation. Similarly, many Section 8 voucher holders are racial or ethnic minorities and most housing that accepts Section 8 vouchers is grouped in a few select areas, which again results in residential segregation. The report offers recommendations to curb such residential segregation, which include:

- Dispersing public housing developments throughout cities and communities; and
- Providing greater incentives for landlords with properties throughout an area to accept the coupons.¹⁶

Published in 2009 by the National Fair Housing Alliance, “For Rent: No Kids!: How Internet Housing Advertisements Perpetuate Discrimination” presented research on the prevalence of discriminatory housing advertisements on popular websites such as Craigslist. According to the article, while newspapers are prohibited from publishing discriminatory housing advertisements, no such law exists for websites such as Craigslist, as they are considered interactive internet providers rather than publishers of content. As such, they are not held to the same legal standards as newspapers. Currently, while individual landlords who post discriminatory advertisements may be held responsible, there are no such standards for companies, like Craigslist, that post the advertisements that are discriminatory. Other publishers of content, like newspapers, are currently required to scan the advertisements they accept for publishing for content that could be seen as discriminatory such as phrases like “no children” or “Christian only” that violate provisions of the Fair Housing Act in their stated preferences that violate protected groups like families with children and religion.

In May 2010, the National Fair Housing Alliance published a fair housing trends report, entitled “A Step in the Right Direction,” which indicated that recent years have demonstrated forward movement in furthering fair housing. The report began with a commendation of HUD’s federal enforcement of fair housing laws and noted the agency’s willingness to challenge local jurisdictions that failed to affirmatively further fair housing such as in the landmark cases against Westchester County, New York (see next section). In response to the recent foreclosure crisis, many credit institutions have implemented tactics to reduce risk, but this report suggests that policies that tighten credit markets, such as requiring larger cash reserves, higher down payments and better credit scores, may disproportionately affect lending

¹⁶ <http://www.prrac.org/pdf/FinalCERDHousingDiscriminationReport.pdf>

options for communities of color and women. “A Step in the Right Direction” concludes with examples of ways in which the fair housing situation could be further improved including addressing discriminatory internet advertisements and adding gender identity, sexual orientation and source of income as federally protected classes.¹⁷

OTHER CASES WITH NATIONAL IMPLICATIONS

In a landmark fraud case, Westchester County, New York, was ordered to pay more than \$50 million to resolve allegations of misusing federal funds for public housing projects and falsely claiming certification of furthering fair housing. The lawsuit, which was filed in 2007 by an anti-discrimination center, alleged that the County failed to reduce racial segregation of public housing projects in larger cities within the county and to provide affordable housing options in its suburbs. The County had accepted more than \$50 million from HUD between 2000 and 2006 with promises of addressing these problems. In a summary judgment in February 2009, a New York judge ruled that the County did not properly factor in race as an impediment to fair housing and that the County did not accurately represent its efforts of integration in its analysis of impediments. In the settlement, Westchester County will be forced to pay more than \$30 million to the federal government, with roughly \$20 million eligible to return to the County to aid in public housing projects. The County must also set aside \$20 million to build public housing units in suburbs and areas with mostly white populations. The ramifications of this case are expected to affect housing policies of both states and entitlement communities across the nation, in which activities taken to affirmatively further fair housing will likely be held to higher levels of scrutiny to ensure that federal funds are being spent to promote fair housing and affirmatively further fair housing.

In 2008, \$3 billion of federal disaster aid was allotted to Texas State government to provide relief from damage caused by hurricanes Ike and Dolly. These storms ravaged homes in coastal communities, and many of these homes were owned by low-income families who could not afford to rebuild. However, instead of directing the federal funds to the areas most affected by the storms, the State spread the funds across Texas and let local planning agencies spend at will. In reaction to this, two fair housing agencies in the state filed a complaint with HUD stating that the plan violated fair housing laws as well as federal aid requirements that specify that half of the funds be directed to lower-income persons. In light of the complaint, HUD withheld \$1.7 billion in CDBG funds until the case could be resolved. A settlement was reached in June 2010. As part of the settlement, the State was required to redirect 55.0 percent of the amount of the original funds to aid poorer families who lost their homes. The State was also asked to rebuild public housing units that were destroyed by the storms and offer programs to aid minority and low-income residents in relocating to less storm-prone areas or areas with greater economic opportunities.

LOCAL FAIR HOUSING CASES AND STUDIES

No local fair housing cases or studies pertinent to the State of Wyoming were identified as of April 2011.

¹⁷ National Fair Housing Alliance, “A Step Forward”, Accessed January 24, 2011

RECENT FAIR HOUSING SUITS FILED WITH THE U.S. DEPARTMENT OF JUSTICE

The U.S. Department of Justice enacts lawsuits on behalf of individuals based on referrals from HUD. Under the Fair Housing Act, the DOJ may file lawsuits in the following instances:

- Where there is reason to believe that a person or entity is engaged in what is termed a “pattern or practice” of discrimination or where a denial of rights to a group of people raises an issue of general public importance;
- Where force or threat of force is used to deny or interfere with fair housing rights;
- Where people who believe that they have been victims of an illegal housing practice file a complaint with HUD or file their own lawsuit in federal or state court.

No cases were found on the Department of Justice website as occurring within the State of Wyoming within the past few years as of April 2011.

SUMMARY

A review of the fair housing profile in the State of Wyoming revealed that the U.S. Department of Housing and Urban Development (HUD), with a regional office in Denver and a field office in Casper, offers fair housing services in Wyoming including complaint and compliance review. Examination of both national fair housing studies and cases supported the idea that while housing discrimination activity may have declined in recent years, disabled persons and racial and ethnic minorities remain commonly affected victims of housing discrimination.

SECTION IV. FAIR HOUSING IN THE PRIVATE SECTOR

As part of the AI process, HUD suggests that analysis focus on possible housing discrimination issues in both the private and public housing sectors. Examination of Wyoming's public sector is presented in Section V, but the focus of this section lies on research into the state of fair housing in Wyoming's private sector including the mortgage lending market, the real estate market, the rental market and other private housing industries.

HOME MORTGAGE LENDING DATA

Since the 1970s, the federal government has enacted several laws aimed at promoting fair lending practices in the banking and financial services industries. A brief description of selected federal laws aimed at promoting fair lending follows:

The 1968 Fair Housing Act prohibits discrimination in housing based on race, color, religion or national origin. Later amendments added sex, familial status and disability. Under the Fair Housing Act, it is illegal to discriminate against any of the protected classes in the following types of residential real estate transactions: making loans to buy, build or repair a dwelling; selling, brokering or appraising residential real estate; or selling or renting a dwelling.

The Equal Credit Opportunity Act was passed in 1974 to prohibit discrimination in lending based on race, color, religion, national origin, sex, marital status, age, receipt of public assistance or the exercise of any right under the Consumer Credit Protection Act.¹⁸

The Community Reinvestment Act was enacted in 1977 to require each federal financial supervisory agency to encourage financial institutions to help meet the credit needs of their entire community, including low- and moderate-income neighborhoods.

Under the Home Mortgage Disclosure Act (HMDA), enacted in 1975 and later amended, financial institutions are required to publicly disclose the race, sex, ethnicity and household income of mortgage applicants by the census tract in which the loan is proposed, as well as outcome of the loan application. The analysis presented herein is from the HMDA data system.

The HMDA requires both depository and non-depository lenders to collect and publicly disclose information about housing-related loans and applications for such loans.¹⁹ Both types of lending institutions must meet a set of reporting criteria, as follows:

1. The institution must be a bank, credit union or savings association.
2. The total assets must exceed the coverage threshold.²⁰
3. The institution must have had an office in a metropolitan statistical area (MSA).

¹⁸ *Closing the Gap: A Guide to Equal Opportunity Lending*, The Federal Reserve Bank of Boston, April 1993.

¹⁹ Data are considered "raw" because they contain entry errors and incomplete loan applications. Starting in 2004, the HMDA data made substantive changes in reporting. It modified the way it handled Hispanic data, loan interest rates, as well as the reporting of multifamily loan applications.

²⁰ Each December the Federal Reserve announces the threshold for the following year. The asset threshold may change from year to year, based on changes in the Consumer Price Index for Urban Wage Earners and Clerical Workers.

4. The institution must have originated at least one home purchase loan or refinancing of a home purchase loan secured by a first lien on a one- to four-family dwelling.
5. The institution must be federally insured or regulated.
6. The mortgage loan must have been insured, guaranteed or supplemented by a federal agency or intended for sale to Fannie Mae or Freddie Mac.

For other institutions, including non-depository institutions, the reporting criteria are as follows:

1. The institution must be a for-profit organization.
2. The institution's home purchase loan originations must equal or exceed 10.0 percent of the institution's total loan originations, or more than \$25 million.
3. The institution must have had a home or branch office in an MSA or have received applications for, originated or purchased five or more home purchase loans, home improvement loans, or refinancing mortgages on property located in an MSA in the preceding calendar year.
4. The institution must have assets exceeding \$10 million or have originated 100 or more home purchases in the preceding calendar year.

HMDA data represent most mortgage lending activity and are thus the most comprehensive collection of information regarding home purchase originations, home remodel loan originations and refinancing available.

As presented in Table IV.1, HMDA information was collected for the State of Wyoming for the years 2004 through 2009. During this time, 275,300 loan applications were reported by participating institutions for home purchases, home improvements and refinancing mortgages. A total of 107,282 of these loan applicants were specifically for home purchases.

Table IV.1							
Purpose of Loan by Year							
State of Wyoming							
HMDA Data							
Purpose	2004	2005	2006	2007	2008	2009	Total
Home Purchase	17,690	21,996	22,986	19,862	13,173	11,575	107,282
Home Improvement	2,913	3,289	4,382	5,212	3,536	2,442	21,774
Refinancing	27,056	26,501	22,846	23,160	19,039	27,642	146,244
Total	47,659	51,786	50,214	48,234	35,748	41,659	275,300

Table IV.2, presented on the following page, shows the HMDA data separated by entitlement and non-entitlement areas. While slightly more loan applications were counted in Cheyenne than Casper, the majority of loans were filed in the remainder of the state with nearly 70.0 percent of the home purchase loan applications filed in this area.

Table IV.2							
Purpose of Loan by Year							
State of Wyoming							
HMDA Data							
Purpose	2004	2005	2006	2007	2008	2009	Total
City of Casper							
Home Purchase	2,596	3,146	3,419	3,165	2,167	1,704	16,197
Home Improvement	414	491	669	815	516	334	3,239
Refinancing	3,340	3,058	2,747	2,926	2,471	3,355	17,897
Total	6,350	6,695	6,835	6,906	5,154	5,393	37,333
City of Cheyenne							
Home Purchase	3,219	3,893	3,288	2,515	2,103	2,101	17,119
Home Improvement	364	428	545	532	331	228	2,428
Refinancing	4,670	4,552	3,773	3,304	2,818	4,202	23,319
Total	8,253	8,873	7,606	6,351	5,252	6,531	42,866
Remainder of State							
Home Purchase	11,875	14,957	16,279	14,182	8,903	7,770	73,966
Home Improvement	2,135	2,370	3,168	3,865	2,689	1,880	16,107
Refinancing	19,046	18,891	16,326	16,930	13,750	20,085	105,028
Total	33,056	36,218	35,773	34,977	25,342	29,735	195,101
State of Wyoming							
Home Purchase	17,690	21,996	22,986	19,862	13,173	11,575	107,282
Home Improvement	2,913	3,289	4,382	5,212	3,536	2,442	21,774
Refinancing	27,056	26,501	22,846	23,160	19,039	27,642	146,244
Total	47,659	51,786	50,214	48,234	35,748	41,659	275,300

Within this set of data, it is of importance to evaluate only the owner-occupied home purchase transactions or those involving the choice to acquire a home. Home purchases are the focus of this particular analysis because the other categories typically apply to units already purchased and do not reflect the ability of an individual to choose an owner-occupied home. As seen in Table IV.3, of the 107,282 home purchase loan applications, 94,761 were specifically for owner-occupied homes. Overall, the market decreased by more than 46.0 percent from 2006 through 2009, but the number of owner-occupied home purchase loan applications was highest in 2006 at nearly 20,000. The remainder of the state had the lowest overall rate of owner-occupied home loan applications.

Table IV.3							
Owner Occupancy Status for Home Purchase Loan Application							
State of Wyoming							
HMDA Data							
Status	2004	2005	2006	2007	2008	2009	Total
City of Casper							
Owner-Occupied	2,374	2,875	3,145	2,851	1,972	1,599	14,816
Not Owner-Occupied	208	263	268	291	187	89	1,306
Not Applicable	14	8	6	23	8	16	75
Total	2,596	3,146	3,419	3,165	2,167	1,704	16,197
City of Cheyenne							
Owner-Occupied	2,729	3,391	2,961	2,284	1,916	1,987	15,268
Not Owner-Occupied	466	480	319	223	184	108	1,780
Not Applicable	24	22	8	8	3	6	71
Total	3,219	3,893	3,288	2,515	2,103	2,101	17,119
Remainder of State							
Owner-Occupied	10,513	12,979	13,889	12,213	7,912	7,171	64,677
Not Owner-Occupied	1,263	1,716	2,336	1,796	963	557	8,631
Not Applicable	99	262	54	173	28	42	658
Total	11,875	14,957	16,279	14,182	8,903	7,770	73,966
State of Wyoming							
Owner-Occupied	15,616	19,245	19,995	17,348	11,800	10,757	94,761
Not Owner-Occupied	1,937	2,459	2,923	2,310	1,334	754	11,717
Not Applicable	137	292	68	204	39	64	804
Total	17,690	21,996	22,986	19,862	13,173	11,575	107,282

Table IV.4 shows the number of loans in the state by loan type. Of the 94,761 loan applications, 74,728 were through conventional lending approaches. However, conventional lending fell drastically from a high of 17,813 in 2006 to a low of 4,234 in 2009. All other loan types, but especially FHA loans, rose appreciably with the FHA loan type increasing from 1,351 in 2007 to 3,942 in 2009. This trend was seen across the state.

Table IV.4							
Owner-Occupied Home Purchase Loan Applications by Loan Type							
State of Wyoming							
HMDA Data							
Loan Type	2004	2005	2006	2007	2008	2009	Total
City of Casper							
Conventional	2,160	2,707	2,944	2,617	1,210	545	12,183
FHA - Insured	179	133	150	170	663	923	2,218
VA - Guaranteed	35	34	51	64	98	93	375
Rural Housing Service/Farm Service Agency	0	1	0	0	1	38	40
Total	2,374	2,875	3,145	2,851	1,972	1,599	14,816
City of Cheyenne							
Conventional	2,168	2,877	2,470	1,806	884	579	10,784
FHA - Insured	160	99	148	155	635	858	2,055
VA - Guaranteed	400	415	343	322	397	547	2,424
Rural Housing Service/Farm Service Agency	1	0	0	1	0	3	5
Total	2,729	3,391	2,961	2,284	1,916	1,987	15,268
Remainder of State							
Conventional	9,039	11,554	12,399	10,712	4,947	3,110	51,761
FHA - Insured	1,010	964	1,029	1,026	2,213	2,161	8,403
VA - Guaranteed	396	419	429	462	570	644	2,920
Rural Housing Service/Farm Service Agency	68	42	32	13	182	1,256	1,593
Total	10,513	12,979	13,889	12,213	7,912	7,171	64,677
State of Wyoming							
Conventional	13,367	17,138	17,813	15,135	7,041	4,234	74,728
FHA - Insured	1,349	1,196	1,327	1,351	3,511	3,942	12,676
VA - Guaranteed	831	868	823	848	1,065	1,284	5,719
Rural Housing Service/Farm Service Agency	69	43	32	14	183	1,297	1,638
Total	15,616	19,245	19,995	17,348	11,800	10,757	94,761

After the owner-occupied home purchase loan application is submitted, the financing institution makes one of several decisions:

- “Originated” indicates that the loan was made by the lending institution.
- “Approved but not accepted” notes loans approved by the lender, but not accepted by the applicant.
- “Application denied by financial institution” indicates that the loan application failed.
- “Application withdrawn by applicant” means that the applicant closed the application.
- “File closed for incompleteness” means that the loan application process was closed by the institution due to incomplete information.
- “Loan purchased by the institution” indicates that the previously originated loan was purchased on the secondary market.

These outcomes were used to determine denial rates presented herein. For this analysis, only loan originations and loan denials were inspected as an indicator of the underlying success or failure of home purchase loan applicants. Altogether, there were 50,895 loan originations and 10,848 applications denied for an average six-year denial rate of 17.6 percent, as seen in Table IV.5, on the following page. Rates varied throughout the time period from a high of 18.7 percent in 2005 to a low of 12.6 percent in 2009.

Table IV.5							
Owner Occupied Home Purchase Loan Applications by Action Taken							
State of Wyoming							
HMDA Data							
Action	2004	2005	2006	2007	2008	2009	Total
Loan Originated	8,403	10,261	10,574	9,296	6,683	5,678	50,895
Application Approved But Not Accepted	896	1,010	1,108	952	457	305	4,728
Application Denied	1,920	2,353	2,307	2,097	1,352	819	10,848
Application Withdrawn By Applicant	974	1,302	1,066	800	582	445	5,169
File Closed for Incompleteness	194	205	193	182	94	66	934
Loan Purchased by the Institution	3,229	4,105	4,745	4,020	2,632	3,442	22,173
Preapproval Request Denied	0	9	2	1	0	2	14
Total	15,616	19,245	19,995	17,348	11,800	10,757	94,761
Denial Rate	18.6%	18.7%	17.9%	18.4%	16.8%	12.6%	17.6%

Denial rates varied by year, as seen in Diagram IV.1. In general, the number of loans denied in the State of Wyoming decreased between 2004 and 2009, and in this six-year time period denial rates fell from 18.6 percent in 2004 to 12.6 percent in 2009.

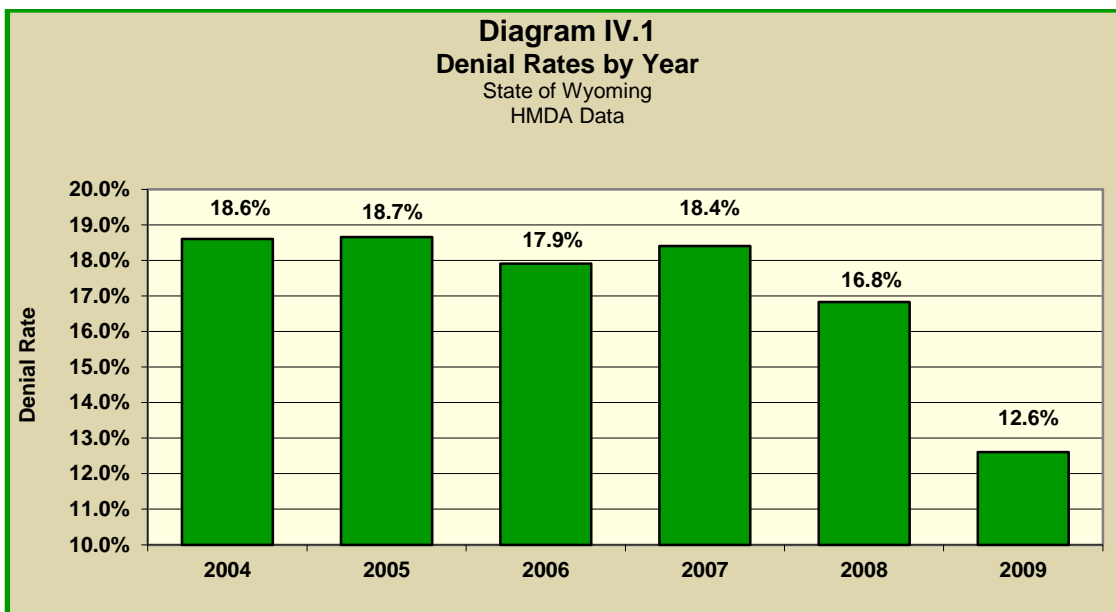
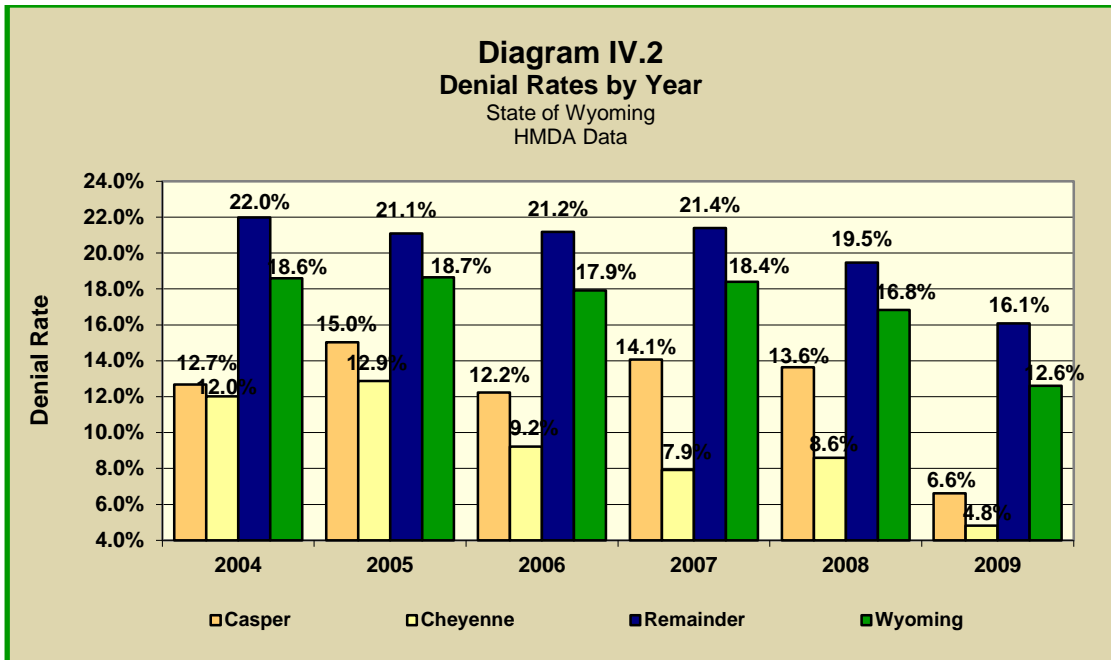
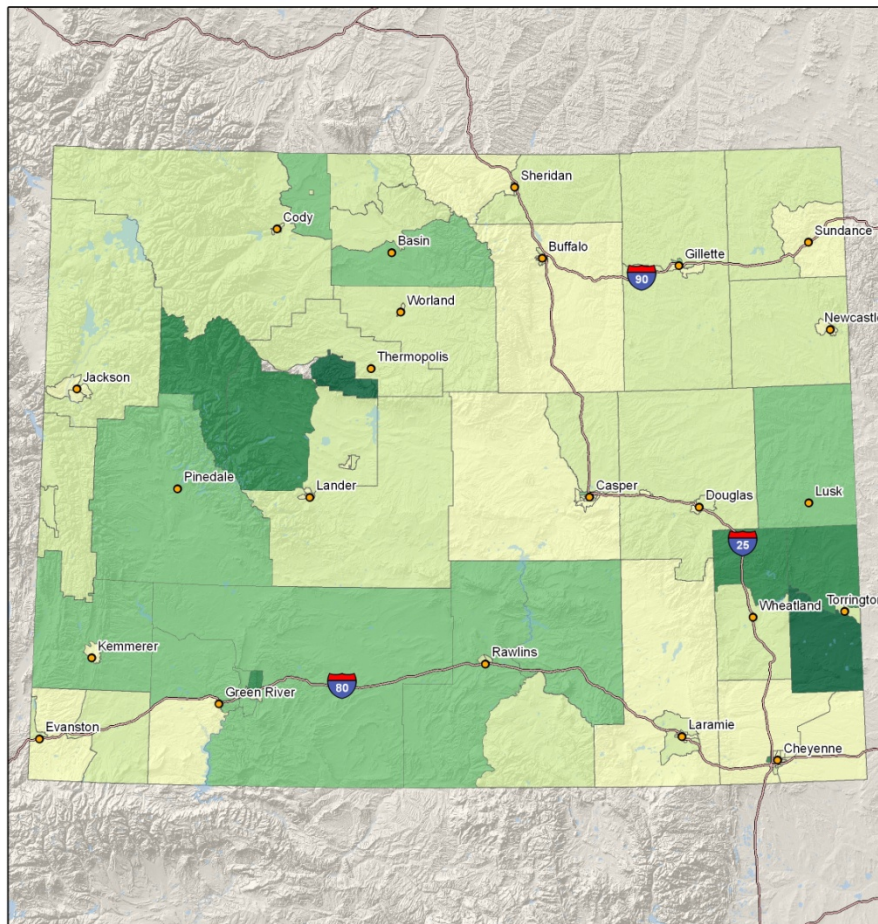


Diagram IV.2, on the following page, presents denial rates by year and clearly demonstrates the differences between denial rates experienced in Casper and Cheyenne versus the remainder of the state. Data for these areas showed that while Casper and Cheyenne had comparable overall denial rates of 12.8 and 9.8 percent, respectively, the remainder of the state had an overall denial rate of more than 20.0 percent during this time period. Additional detailed tables showing denial rates for the entitlement cities and the remainder of the state are presented in Appendix C.



Importantly, denial rates were not evenly distributed throughout the state. As shown in Map IV.1, on the following page, numerous census tracts in Wyoming had denial rates well above the state average of 17.6 percent. Tracts with significantly high denial rates were located near Lander in American Indian reservation lands as well as between Torrington and Wheatland.

Map IV.1
HMDA Denial Rate by Census Tract
 State of Wyoming
 HMDA Data, 2004 – 2009



LEGEND

Average Loan Denial Rate for all of the State of Wyoming = 17.6%

Disproportionate Share of Loan Denial Rate for all of the State of Wyoming = 27.6%

NOTE: Disproportionate Share is defined as any Census Tract with greater than 10% points higher than the average.

Data Source: 2000, 2010 Census and Tigerfiles; Wyoming GIS Library: <http://wygisl.org/>; ESRI basemap

Percent of Denial Rate State Total	
0.0 - 17.6	Disproportionate Share Threshold
17.7 - 27.6	
27.7 - 30.0	
30.1 - 40.0	
40.1 - 44.4	

LEGEND

- Census Tract Boundaries
- Interstate Highway

0 50 Miles

HMDA data were also used to determine denial rates by gender. Table IV.6, presented on the following page, shows that in those applications in which gender was provided by the applicant, denial rates were uneven with females experiencing higher denial rates as compared to males. Between 2004 and 2009, male applicants experienced a total denial rate of 16.3 percent while female applicants experienced a total denial rate of 19.9 percent.

Table IV.6					
Denial Rate for Owner Occupied Home Purchase Loan Applications by Gender					
State of Wyoming HMDA Data					
Year	Male	Female	Not Provided by Applicant	Not Applicable	Total
2004	17.4%	20.1%	37.8%	0.0%	18.6%
2005	17.2%	21.7%	29.8%	33.3%	18.7%
2006	16.8%	19.0%	37.0%	0.0%	17.9%
2007	16.4%	22.7%	30.7%	0.0%	18.4%
2008	16.1%	18.9%	20.1%	0.0%	16.8%
2009	11.8%	14.3%	17.4%	0.0%	12.6%
Total	16.3%	19.9%	30.0%	8.7%	17.6%

Additional tables regarding denial rates for the entitlement cities and non-entitlement areas of the state showed that women experienced a denial rate of nearly 25.0 percent in the remainder of the state as compared to a denial rate for men of 19.1 percent. These tables are presented in Appendix C.

Denial rates were calculated by race and ethnicity of the loan applicants as well and these data are presented in Table IV.7. As shown therein, most minority racial and ethnic applicants had higher denial rates than white applicants with the exception of Asian applicants who actually experienced a lower overall denial rate than white applicants. Black and American Indian applicants experienced denial rates that were roughly twice as high at 25.8 and 36.1 percent, respectively. In terms of ethnicity, HMDA data showed a 23.1 percent denial rate for Hispanic applicants.

Table IV.7							
Percent Denial Rates by Race/Ethnicity							
State of Wyoming HMDA Data							
Race/Ethnicity	2004	2005	2006	2007	2008	2009	Total
American Indian or Alaskan Native	31.4%	31.3%	39.6%	38.6%	38.2%	40.0%	36.1%
Asian	11.3%	23.5%	7.3%	23.4%	15.1%	9.3%	16.0%
Black	21.7%	30.3%	28.7%	27.9%	26.7%	3.6%	25.8%
White	17.1%	17.1%	16.6%	17.0%	16.3%	12.2%	16.3%
Not Applicable	38.1%	35.7%	33.7%	32.6%	24.0%	16.8%	32.2%
No Co-Applicant	28.6%	33.3%	0.0%	0.0%	0.0%	0.0%	19.0%
Total	18.6%	18.7%	17.9%	18.4%	16.8%	12.6%	17.6%
Hispanic (Ethnicity)	22.2%	25.9%	23.1%	23.9%	23.2%	15.4%	23.1%

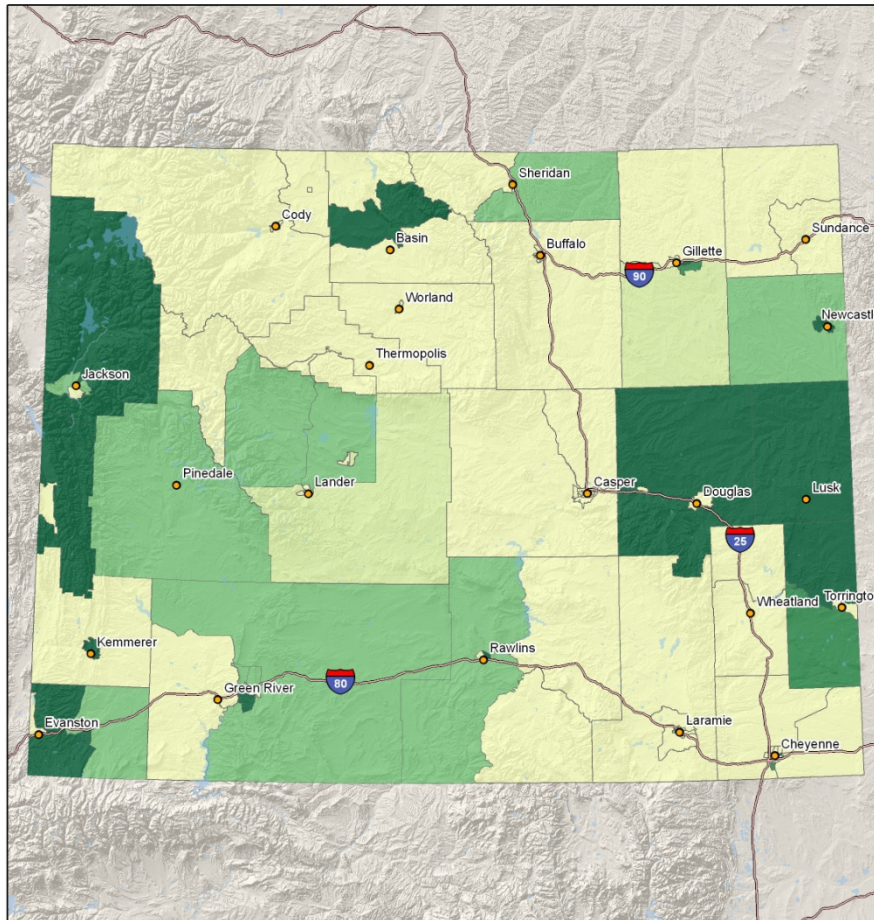
Additional data on denial rates by race and ethnicity by year for the entitlement cities and remainder of the state are presented in Appendix C. These tables show that denial rates for all minority racial and ethnic groups were higher in the non-entitlement areas of the state as compared to the entitlement cities.

Table IV.8 presents an overall denial rate for the entitlement and non-entitlement areas of the state by race and ethnicity. In the remainder of the state, white applicants experienced a denial rate of 19.1 percent, while American Indian applicants, black applicants and Hispanic applicants experienced rates of 40.5, 33.9 and 28.9 percent, respectively. In many cases, the denial rate in the remainder of the state was more than twice that of the entitlement cities.

Table IV.8				
Percent Denial Rates by Race/Ethnicity				
State of Wyoming				
HMDA Data, 2004 – 2009				
Race/Ethnicity	Casper	Cheyenne	Remainder	Wyoming
American Indian or Alaskan Native	17.4%	17.80%	40.5%	36.1%
Asian	11.2%	8.00%	20.6%	16.0%
Black	26.2%	16.30%	33.9%	25.8%
White	12.1%	9.00%	19.1%	16.3%
Not Applicable	23.8%	20.70%	36.3%	32.2%
No Co-Applicant	33.3%	14.30%	18.8%	19.0%
Total	12.8%	9.80%	20.6%	17.6%
Hispanic (Ethnicity)	14.1%	11.90%	28.9%	23.1%

Denial rates by race and ethnicity were plotted on a map to examine geographic location of loan denials. For example, Map IV.2, on the following page, presents home loan application denial rates in Wyoming for American Indian applicants and shows that some areas of the state experienced denial rates well above the state average of 36.1 percent. In fact, some census tracts in the west, north and southeastern parts of the state showed a concentration of denial rates in excess of 75.0 percent.

Map IV.2
Denial Rate for American Indian Applicants by Census Tract
 State of Wyoming
 HMDA Data, 2004 – 2009



LEGEND

Average Loan Denial Rate for American Indians within the State of Wyoming = 36.1%

Disproportionate Share of Loan Denial Rate for American Indians within the State of Wyoming = 46.1%

NOTE: Disproportionate Share is defined as any Census Tract with greater than 10% points higher than the average.

LEGEND

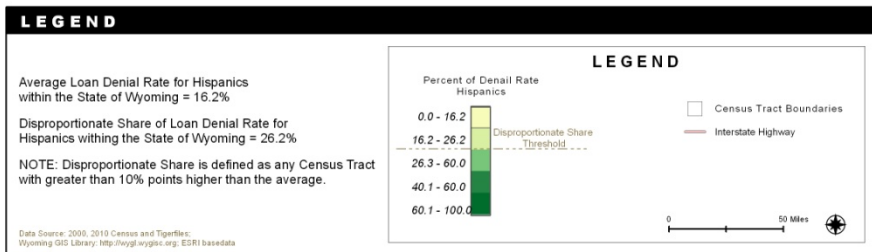
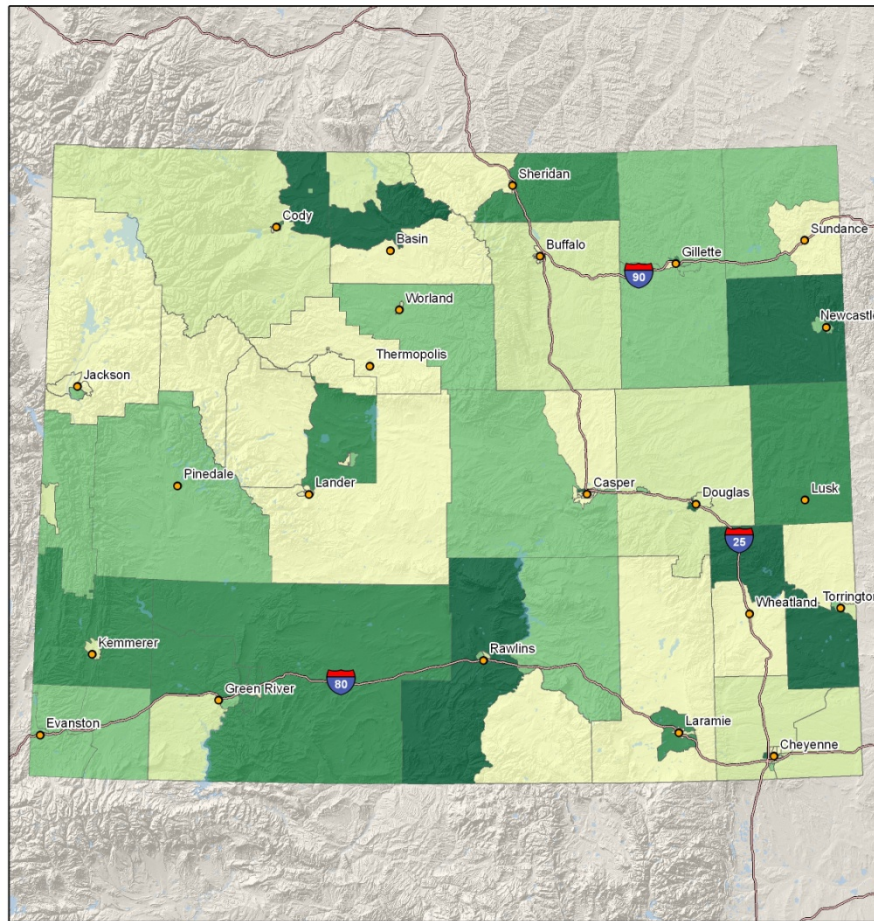
Percent of Denial Rate American Indian

0.0 - 36.1	Disproportionate Share	□ Census Tract Boundaries
36.2 - 46.1	Threshold	— Interstate Highway
46.2 - 60.0		
60.1 - 75.0		
75.1 - 100		

0 50 Miles

Map IV.3 presents geographic data on denial rates for Hispanic applicants in Wyoming. A number of census tracts dispersed throughout the state demonstrated denial rates in excess of 60.0 percent. These tracts were located near Basin, Casper, Rawlins, Newcastle, and Wheatland.

Map IV.3
Denial Rate for Hispanic Applicants by Census Tract
 State of Wyoming
 HMDA Data, 2004 – 2009



Part of the HMDA data includes information about the reason for the loan denial, although financial institutions are not uniformly required to fill out this field. Nevertheless, the most frequently cited categories of denials were credit history and debt-to-income ratio, as shown in Table IV.9. However, it cannot be conclusively stated from these data alone that discriminatory lending in the home purchase market occurred, only that there is an institutional inequity in these denial rates. This problem could potentially be reduced through enhancing programs for consumers to better understand the importance of establishing good credit.

Table IV.9							
Owner Occupied Home Purchase Loan Applications by Reason for Denial							
State of Wyoming HMDA Data							
Denial Reason	2004	2005	2006	2007	2008	2009	Total
Debt-to-income Ratio	193	191	204	219	199	119	1,125
Employment History	37	40	40	49	35	30	231
Credit History	412	549	506	556	324	201	2,548
Collateral	169	206	201	178	160	102	1,016
Insufficient Cash	59	29	28	38	34	26	214
Unverifiable Information	47	87	51	83	19	22	309
Credit Application Incomplete	122	146	156	146	73	31	674
Mortgage Insurance Denied	0	1	4	5	3	3	16
Other	303	504	371	175	81	70	1,504
Missing	578	600	746	648	424	215	3,211
Total	1,920	2,353	2,307	2,097	1,352	819	10,848

Tables reporting denial rate by reason for the different geographic areas of the state are presented in Appendix C. Data showed that a higher proportion of missing reasons and a higher share of missing reasons for Native Americans were seen in the information for the remainder of the state.

Table IV.10 shows denial rates by income for Wyoming. As one might expect, households with lower incomes tended to be denied for loans more often. Households with income from \$15,000 to \$30,000 were denied an average of 30.8 percent of the time but those with incomes above \$75,000 were denied only 14.1 percent of the time on average.

Table IV.10							
Percent Denial Rates by Income							
State of Wyoming HMDA Data							
Income	2004	2005	2006	2007	2008	2009	Total
<= \$15K	59.4%	58.9%	59.7%	75.4%	60.5%	53.3%	61.5%
\$15K - \$30K	27.8%	31.6%	30.5%	34.6%	38.1%	24.0%	30.8%
\$30K - \$45K	18.3%	19.1%	18.3%	19.0%	17.2%	13.9%	18.0%
\$45K - \$60K	16.1%	18.5%	16.4%	17.4%	14.1%	11.3%	16.1%
\$60K - \$75K	15.9%	14.5%	17.1%	15.9%	14.2%	11.0%	15.1%
Above \$75K	13.4%	13.5%	15.6%	15.0%	15.0%	9.9%	14.1%
Data Missing	35.1%	19.2%	12.9%	19.7%	16.7%	23.6%	20.4%
Total	18.6%	18.7%	17.9%	18.4%	16.8%	12.6%	17.6%

In the entitlement cities and the remainder of the state, with data presented in Appendix C, the differences between Casper and Cheyenne and the remainder of the state were pronounced. For households with incomes above \$75,000, the remainder of the state showed a denial rate of 12.2 percent, but Casper and Cheyenne showed rates of 4.3 and 4.8 percent, respectively.

Table IV.11 presents denial rates segmented by race or ethnicity and income. Even when correcting for income, minority racial and ethnic applicants faced a much higher loan denial rate than whites. For example, American Indian applicants experienced much higher loan denial rates than white applicants across all income levels; at income levels between \$15,000 and \$30,000 American Indian applicants had a denial rate of 68.9 percent compared to a white denial rate of 28.8 percent, and at incomes over \$75,000 American Indian applicants had a denial rate of 29.8 percent compared to 13.1 percent for white applicants.

Table IV.11								
Percent Denial Rates of Owner-Occupied Home Purchase Loans by Race/Ethnicity by Income								
State of Wyoming								
HMDA Data, 2004 – 2009								
Race/Ethnicity	<= \$15K	\$15K - \$30K	\$30K - \$45K	\$45K - \$60K	\$60K - \$75K	Above \$75K	Data Missing	Total
American Indian/Alaskan Native	100.0%	68.9%	40.7%	25.5%	23.3%	29.8%	20.0%	36.1%
Asian	75.0%	18.2%	14.8%	12.2%	14.6%	17.3%	36.4%	16.0%
Black	100.0%	55.6%	23.7%	21.1%	25.0%	18.9%	100.0%	25.8%
White	59.6%	28.8%	16.9%	15.0%	14.1%	13.1%	16.6%	16.3%
Not Applicable	75.0%	50.0%	31.3%	32.5%	27.9%	26.0%	41.0%	32.2%
No Co-Applicant	0.0%	66.7%	20.0%	20.0%	50.0%	20.0%	0.0%	19.0%
Total	61.5%	30.8%	18.0%	16.1%	15.1%	14.1%	20.4%	17.6%
Hispanic (Ethnicity)	63.6%	39.8%	20.8%	20.2%	20.3%	20.0%	17.6%	23.1%

Data presented in Appendix C show the denial rates by race and income for the entitlement cities and the remainder of the state. Overall, much lower rates of denial were seen in the entitlement cities as compared to the remainder of the state. Furthermore, denial rates for racial and ethnic minority applicants in the remainder of the state were much higher than rates for white applicants, even for those earning more than \$75,000 per year.

HIGH INTEREST RATE LENDING

In addition to modifications implemented in 2004 for documenting loan applicants' race and ethnicity, the HMDA reporting requirements were changed in response to the Predatory Lending Consumer Protection Act of 2002, as well as the Home Owner Equity Protection Act (HOEPA). Consequently, loan originations are now flagged in the data system for three additional attributes:

1. If they are HOEPA loans;
2. Lien status, such as whether secured by a first lien, a subordinate lien, not secured by a lien, or not applicable (purchased loans); and
3. Presence of high annual percentage rate loans (HALs), defined as more than three percentage points for home purchases when contrasted with comparable treasury instruments or five percentage points for refinance loans.

Originated owner-occupied home purchase loans qualifying as HALs were identified for 2004 through 2009. These high interest loans were considered predatory in nature. Table IV.12 shows that between 2004 and 2009 there were 8,302 owner-occupied HALs originated in the state. Fortunately, the number of HALs decreased significantly after 2006, and by 2009 the overall rate of HALs was almost less than half of what it had been in 2004.

Table IV.12							
Originated Owner-Occupied Loans by Loan Purpose by Predatory Status							
State of Wyoming							
HMDA Data							
Loan Type	2004	2005	2006	2007	2008	2009	Total
Other Originated	7,303	7,880	8,284	7,895	5,957	5,274	42,593
High APR Loan	1,100	2,381	2,290	1,401	726	404	8,302
Total	8,403	10,261	10,574	9,296	6,683	5,678	50,895
Percent High APR	13.1%	23.2%	21.7%	15.1%	10.9%	7.1%	16.3%

The entitlement cities and the remainder of the state showed a similar pattern of decreasing level of HAL type loans over the time period, as seen in data presented in Appendix C. In 2009, Casper showed 7.4 percent of its owner-occupied home purchase loan market as high interest rate loans, and Cheyenne showed a rate of 1.4 percent that same year. However, the remainder of the state showed a 2009 HAL rate of 8.7 percent and a 17.8 percent average over the six-year time period.

The rate of HALs by income is presented in Table IV.13, below. The highest rate of HALs was actually seen in the group with income below \$15,000. Nearly 25.0 percent of loans originated to this group had high interest rates.

Table IV.13							
Percent of Predatory Owner-Occupied Home Purchase Loans Originated by Income							
State of Wyoming							
HMDA Data							
Income	2004	2005	2006	2007	2008	2009	Total
<= \$15K	17.9%	18.9%	37.0%	26.7%	33.3%	21.4%	24.5%
\$15K - \$30K	17.6%	21.8%	23.9%	22.2%	13.9%	7.3%	19.2%
\$30K - \$45K	14.4%	24.3%	19.2%	14.2%	10.4%	6.4%	16.2%
\$45K - \$60K	12.9%	26.1%	22.1%	12.7%	10.5%	6.5%	16.4%
\$60K - \$75K	12.9%	26.9%	24.2%	15.9%	10.8%	6.6%	17.6%
> \$75K	9.6%	17.8%	20.4%	15.0%	10.9%	8.0%	14.5%
Data Missing	6.7%	19.5%	28.2%	26.6%	8.3%	16.7%	20.6%
Total	13.1%	23.2%	21.7%	15.1%	10.9%	7.1%	16.3%

Data on the location of HAL loans by income are presented in Appendix C and show that Casper and Cheyenne tended to have similar HAL rates, but the remainder of the state showed a much higher HAL rate for lower income households.

As shown in Table IV.14, below, the group with the greatest number of HALs in this time period was white applicants with 7,532 such loans. Hispanic applicants had 518 home purchase HALs, while American Indian, black and Asian applicants all had under 100 HAL loans over the time period.

Table IV.14							
Number of Predatory Owner-Occupied Home Purchase Loans Originated by Race/Ethnicity							
State of Wyoming							
HMDA Data							
Race/Ethnicity	2004	2005	2006	2007	2008	2009	Total
American Indian	6	25	11	13	9	5	69
Asian	7	24	27	13	8	1	80
Black or African American	10	26	21	8	0	0	65
White	1,007	2,123	2,057	1,282	680	383	7,532
Not Applicable	70	182	173	85	28	15	553
No Co-Applicant	0	1	1	0	1	0	3
Total	1,100	2,381	2,290	1,401	726	404	8,302
Hispanic (Ethnicity)	66	148	147	95	38	24	518

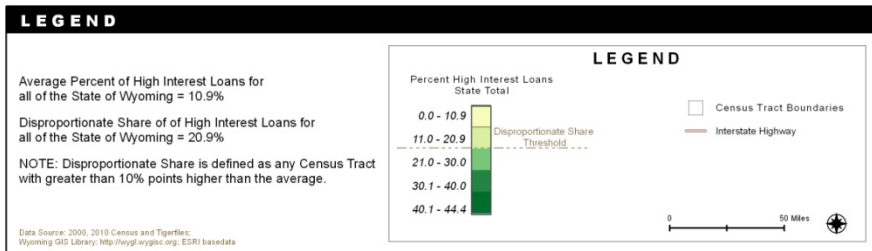
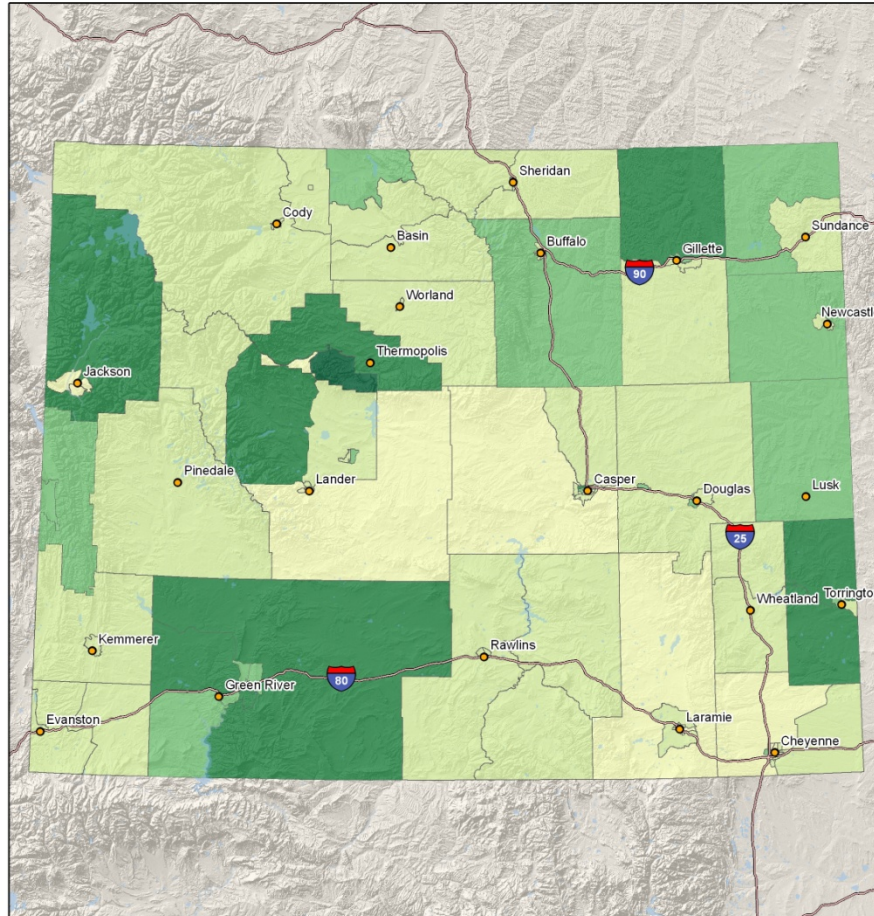
On the other hand, further evaluation of the HMDA data revealed that an unusually high *proportion* of HALs was made to minority racial and ethnic applicants, as shown in Table IV.15. More than 20.0 percent of loans made to American Indian, black and Hispanic applicants were high interest rate loans.

Table IV.15							
Percent of Predatory Owner-Occupied Home Purchase Loans Originated by Race/Ethnicity							
State of Wyoming							
HMDA Data							
Race/Ethnicity	2004	2005	2006	2007	2008	2009	Total
American Indian	12.5%	32.5%	18.0%	25.5%	26.5%	18.5%	23.2%
Asian	9.9%	26.4%	30.3%	15.9%	10.1%	2.0%	17.4%
Black or African American	21.3%	41.9%	27.3%	16.3%	0.0%	0.0%	22.9%
White	12.9%	22.4%	21.0%	15.0%	10.9%	7.2%	16.0%
Not Applicable	16.7%	31.9%	31.7%	15.3%	8.9%	5.3%	20.5%
No Co-Applicant	0.0%	25.0%	20.0%	0.0%	25.0%	0.0%	8.8%
Total	13.1%	23.2%	21.7%	15.1%	10.9%	7.1%	16.3%
Hispanic (Ethnicity)	19.2%	34.3%	33.0%	22.7%	13.7%	11.8%	24.4%

The rate of HALs in the entitlement and non-entitlement areas of the state, as presented in Appendix C, show that Casper's rates ranged from roughly 15.0 to 26.0 percent and Cheyenne's rates were slightly higher and ranged from 10.0 to 16.0 percent. However, in the non-entitlement areas of the state, the rate of HALs was strikingly imbalanced with black applicants experiencing a rate of 30.0 percent, American Indian applicants experiencing a rate of 24.2 percent, and Hispanic applicants experiencing a rate of 28.4 percent. These rates can be compared to a white rate of 17.5 percent. This finding suggests that racial and ethnic minority applicants in the remainder of the state likely carried a higher risk for foreclosure.

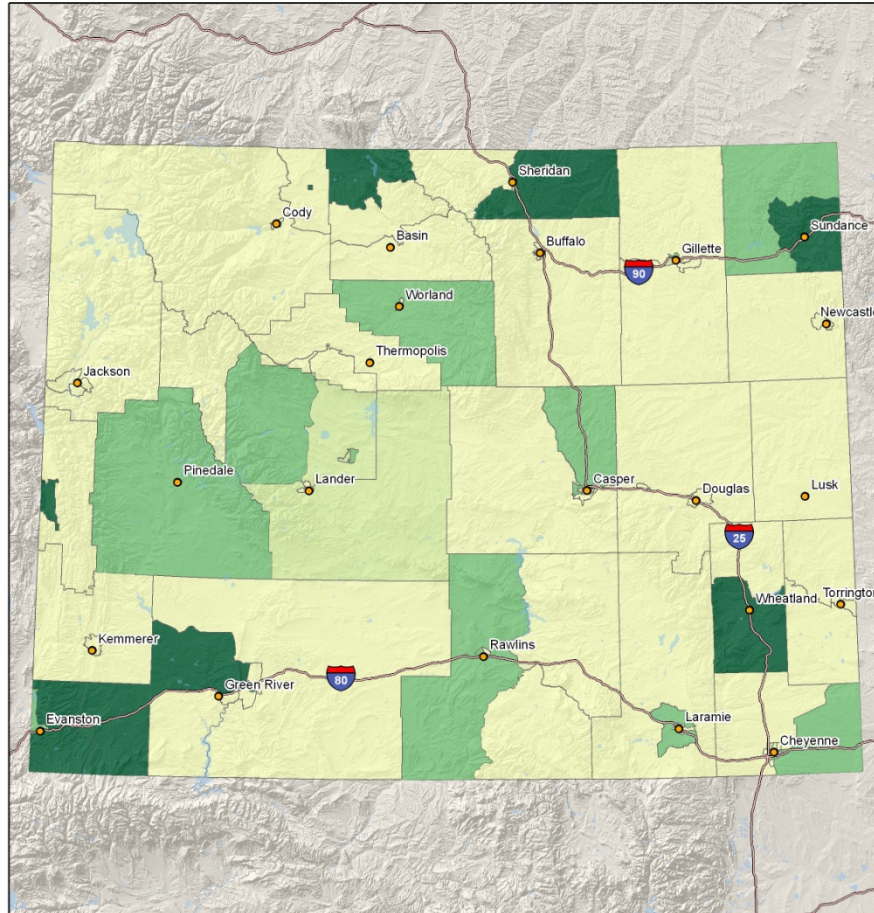
The location of these high interest rate loans was also evaluated as part of the AI process to determine if these loans were most commonly issued in certain areas of the state. Map IV.4, below, shows that HAL-type loans were most common near the Thermopolis area.

Map IV.4
Rate of HAL Loans by Census Tract
 State of Wyoming
 HMDA Data, 2004 – 2009



Map IV.5 presents the HAL concentrations for American Indian applicants. Some census tracts showed a very high concentration of higher interest rate loans. These tracts were located mostly on the perimeter of the state.

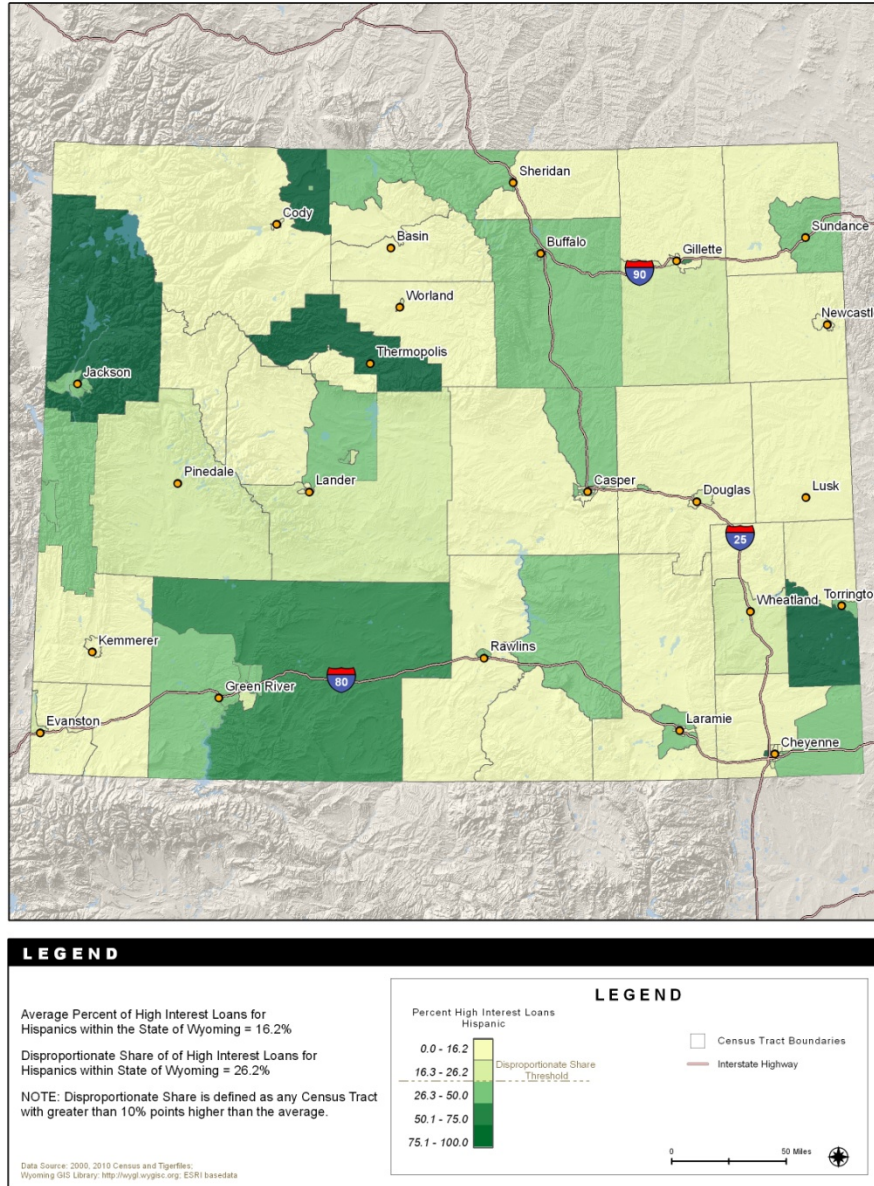
Map IV.5
Rate of HALs for American Indian Applicants by Census Tract
 State of Wyoming
 HMDA Data, 2004 – 2009



LEGEND											
<p>Average Percent of High Interest Loans for American Indians within the State of Wyoming = 13.5%</p> <p>Disproportionate Share of of High Interest Loans for American Indians within State of Wyoming = 23.5%</p> <p>NOTE: Disproportionate Share is defined as any Census Tract with greater than 10% points higher than the average.</p> <p><small>Data Source: 2000, 2010 Census and Tigerfiles; Wyoming GIS Library: http://wygl.wygis.org; ESRI basedata</small></p>	<p align="center">LEGEND</p> <p>Percent High Interest Loans American Indian</p> <table border="1"> <tr> <td>0.0 - 13.5</td> <td>Lightest Yellow</td> </tr> <tr> <td>13.6 - 23.5</td> <td>Light Green</td> </tr> <tr> <td>23.6 - 50.0</td> <td>Medium Green</td> </tr> <tr> <td>50.1 - 60.0</td> <td>Dark Green</td> </tr> <tr> <td>60.1 - 100.0</td> <td>Darkest Green</td> </tr> </table> <p>--- Disproportionate Share Threshold ---</p> <p>□ Census Tract Boundaries</p> <p>— Interstate Highway</p> <p>0 50 Miles</p>	0.0 - 13.5	Lightest Yellow	13.6 - 23.5	Light Green	23.6 - 50.0	Medium Green	50.1 - 60.0	Dark Green	60.1 - 100.0	Darkest Green
0.0 - 13.5	Lightest Yellow										
13.6 - 23.5	Light Green										
23.6 - 50.0	Medium Green										
50.1 - 60.0	Dark Green										
60.1 - 100.0	Darkest Green										

The concentration of HAL-type loans for Hispanic applicants is shown in Map IV.6. Census tracts showing concentrations of HALs for Hispanic applicants were located near Jackson and also between Wheatland and Torrington.

Map IV.6
Rate of HALs for Hispanic Applicants by Census Tract
 State of Wyoming
 HMDA Data, 2004 – 2009



It must be iterated that these findings do not conclusively prove that predatory lending targeted selected racial and ethnic minorities in the state, but only suggest that such inequitable shares should be of concern to Wyoming lenders, policy makers and state leaders alike.

FAIR HOUSING COMPLAINTS

COMPLAINTS FILED WITH HUD

HUD maintains records of all complaints filed with the agency that represent violations of federal housing law. Over the 2005 through 2010 time period, HUD reported a total of 77 fair housing complaints from within the state with a high of 21 in 2005 and a low of six in 2010. While Casper and Cheyenne each reported a total of 15 complaints, nearly 50 complaints were reported from within the remainder of the state. These data are presented in Table IV.16, below.

Year	Casper	Cheyenne	Remainder of State	Wyoming
2005	2	2	17	21
2006	3	2	4	9
2007	6	1	8	15
2008	1	5	7	13
2009	3	3	7	13
2010	0	2	4	6
Total	15	15	47	77

Table IV.17 presents the complaint data by basis or the protected class status of the person alleged to have been aggrieved in the complaint. Complainants may cite more than one basis; hence the number of bases cited can exceed the total number of complaints. As shown therein, a total of 90 bases were cited in relation to the 77 complaints filed. The majority of the complaints were filed on the basis of disability with 23 complaints filed on the basis of mental disability and 22 complaints filed on the bases of physical disability. An additional 11 complaints were filed on the basis of Native American race and eight were filed on the basis of Hispanic ethnicity.

Basis	2005	2006	2007	2008	2009	2010	Total
Disability – Mental	4	2	7	5	4	1	23
Disability – Physical	2	2	2	8	4	4	22
Native American	9	1	1	.	.	.	11
Hispanic	3	.	2	.	2	1	8
Retaliation	.	.	4	2	2	.	8
Family Status	1	2	1	1	2	.	7
Sex – Female	1	1	1	.	.	1	4
Black	.	.	.	1	1	1	3
Sex – Male	.	1	.	.	1	.	2
Religion	.	1	1	.	.	.	2
Total	20	10	19	17	16	8	90
Total Complaints	21	9	15	13	13	6	77

Tables presented in Appendix D show the complaint data by basis for the entitlement cities and the remainder of the state. Data for the remainder of the state showed a similar ranking of the top bases as compared to statewide data. In Casper, the most commonly cited bases were family status, physical disability, and religion, and in Cheyenne the most frequent bases were physical and mental disability followed by black race. These data suggest that discrimination against Native Americans was more frequent in the non-entitlement areas of the state.

The issue, or alleged discriminatory action, that was related to each complaint is presented in Table IV.18. In the same way that bases are reported, more than one issue may be counted per each complaint. In this case, 139 issues were cited with discriminatory refusal to rent cited 30 times, failure to make reasonable accommodation cited 29 times and discrimination in terms, conditions and privileges related to rental cited 28 times. Discriminatory advertising and steering were also cited a significant number of times. The three most commonly cited issues were related specifically to rental transactions, which suggests that discriminatory acts leading to the filing of fair housing complaints are more commonly associated with the rental market.

Issue	2005	2006	2007	2008	2009	2010	Total
Discriminatory refusal to rent	15	2	3	3	4	3	30
Failure to make reasonable accommodation	3	2	7	8	5	4	29
Discrimination in terms-conditions-privileges relation to rental	15	2	4	3	3	1	28
Discriminatory advertising, statements and notices	13	1	1	.	1	.	16
Discriminatory terms, conditions, privileges, or services and facilities	2	1	3	3	4	.	13
Steering	9	9
Discriminatory acts under Section 818 (coercion, etc.)	.	1	3	2	1	.	7
Discriminatory refusal to rent and negotiate for rental	.	2	2
Failure to permit reasonable modification	.	.	1	.	1	.	2
Discriminatory refusal to sell and negotiate for sale	.	.	1	.	.	.	1
False denial or representation of availability – Rental	.	1	1
Otherwise deny or make housing available	1	.	1
Total Issues	57	12	23	19	20	8	139
Total Complaints	21	9	15	13	13	6	77

Tables presented in Appendix D relating to the complaint issues for Casper, Cheyenne and the remainder of the state illustrate that discriminatory refusal to rent was very common throughout the state. Failure to make reasonable accommodation was also frequently cited as a discriminatory issue in fair housing complaints filed; this issue was counted as the second most frequent issue in Casper and the third most frequent issue in both Cheyenne and the remainder of the state. Consequently, this finding aligns with disability counted as the most frequent basis of complaint files in Wyoming, as shown previously in Table IV.17.

Housing complaints filed with HUD can also be examined by closure status. Of the 77 total complaints, the majority of the complaints, 31, were found to have a no cause determination. However, an additional 17 complaints were successfully conciliated or settled and six complaints were withdrawn by the complainant after resolution was reached. These data are presented on the following page in Table IV.19.

Table IV.19							
Fair Housing Complaints by Closure							
State of Wyoming							
HUD Data							
Closure Status	2005	2006	2007	2008	2009	2010	Total
No cause determination	5	4	7	6	7	2	31
Complainant failed to cooperate	12	2	3	2	.	1	20
Conciliation successful	2	3	3	5	4	.	17
Complaint withdrawn after resolution	1	.	1	.	2	2	6
Case still open	.	.	1	.	.	1	2
Complaint withdrawn by complainant without resolution	1	1
Total	21	9	15	13	13	6	77

A similar pattern was found in the closure status of the complaints filed in the entitlement cities and non-entitlement areas of the state wherein very few complaints were successfully resolved. These tables are presented in Appendix D.

Table IV.20 shows that of the 17 complaints that were found to be with cause, seven were related to physical disability and seven were related to mental disability.

Table IV.20							
Successfully Conciliated Fair Housing Complaints by Basis							
State of Wyoming							
HUD Data							
Basis	2005	2006	2007	2008	2009	2010	Total
Disability – Physical	1	1	.	4	1	.	7
Disability – Mental	.	1	3	1	2	.	7
Family Status	.	1	.	.	2	.	3
Religion	.	1	1
Hispanic	1	1
Retaliation	.	.	.	1	.	.	1
Total Basis	2	4	3	6	5	.	20
Total Complaints	2	3	3	5	4	.	17

In the entitlement cities and the non-entitlement areas of the state, successfully conciliated complaints related to a wide variety of bases, as shown in the tables presented in Appendix D. In Casper, successfully resolved complaints related to religion, family status and Hispanic ethnicity. In Cheyenne, successful complaints were filed on the basis of family status, mental and physical disability and retaliation. In the remainder of the state, all successfully conciliated complaints were related to physical and mental disability.

Table IV.21, on the following page, shows the successful complaints separated by issue. In this case, failure to make reasonable accommodation, discriminatory refusal to rent, discrimination in terms, conditions and privileges in relation to rental, and discriminatory advertising, statements and notices were cited most commonly.

Table IV.21							
Successfully Conciliated Fair Housing Complaints by Issue							
State of Wyoming							
HUD Data							
Issue	2005	2006	2007	2008	2009	2010	Total
Failure to make reasonable accommodation	.	.	3	4	1	.	8
Discriminatory refusal to rent	1	2	.	.	3	.	6
Discrimination in terms-conditions-privileges relation to rental	.	.	1	1	1	.	3
Discriminatory advertising, statements and notices	.	1	.	.	1	.	2
Discriminatory terms, conditions, privileges, or services and facilities	2	2
Discriminatory refusal to rent and negotiate for rental	.	1	1
Discriminatory acts under Section 818 (coercion, etc.)	.	.	.	1	.	.	1
Failure to permit reasonable modification	1	.	1
Total Issues	3	4	4	6	7	.	24
Total Complaints	2	3	3	5	4	.	17

In the remainder of the state, failure to make reasonable accommodation was most frequently cited, while discriminatory refusal to rent was most common issue in the entitlement cities of Casper and Cheyenne.

DISCRIMINATION IN RENTAL ADVERTISING

Housing discrimination in the rental markets can also be examined through the prevalence of discriminatory advertising for rental properties. As established previously, according to federal law it is illegal to prohibit sale, lease, rental, assignment, or sublease based on familial status, sex, national origin, color, religion, disability, or race. Consequently, it is also illegal to directly or indirectly advertise that the sale, lease, rental, assignment or sublease of housing is unwelcome or objectionable for any of the aforementioned protected classes. This law does have an exception regarding sex in that an individual may advertise that they prefer a male or female renter if they reside in the dwelling or the dwelling permits no more than two families living independently. There is also an exception for housing that is designated for seniors; it is not illegal to advertise that potential tenants must be above a certain age if the housing is specifically designated for seniors.

In order to examine the prevalence of discrimination in advertising for rental housing, a sample of advertisements was derived from the Craigslist website. This website allows rental management companies and individuals to post advertisements for available rental units. Two types of rental advertisements are posted: apartments and homes for rent and rooms or shared living quarters for rent.

A total of 131 advertisements posted in the week of March 28 through April 3, 2011, were examined for discriminatory or preferential phrasing including 100 advertisements for apartments or homes and 31 advertisements for rooms or shared living quarters. A tally of advertisements by type is listed at right in Table IV.22. Advertisements were posted by both management companies and individuals.

Table IV.22	
Housing Advertisements	
State of Wyoming	
Craigslist Data, April 28 – March 3, 2011	
Room/Shared	31
Housing/Apartments	100
Total	131

Table IV.23 shows common categories of discrimination found in rental advertisements. While questionable phrasing can be obvious, such as “no kids,” questionable phrasing also includes less straightforward language, such as “single persons preferred.” Only one questionable housing advertisement was identified in the sample. This singular advertisement stated a preference regarding familial status of “couples only.”

Table IV.23				
Advertisements with Stated Preferences				
State of Wyoming				
Craigslst Data, April 28 – March 3, 2011				
Female Preference	Male Preference	Religion Preference	Familial Status Preference	Age Preference
0	0	0	1	0

Pets are often mentioned in housing advertisements. While it is legal for advertisements to note a pet policy, individuals with service animals may not be aware that housing advertised as “no pets” must allow services animals. If an individual with a service animal does not know their rights, it may hinder their ability to find housing. In total, 21 advertisements were posted indicating that “no pets” were allowed. This represented more than 15.0 percent of the advertisements in the sample. These data are presented in Table IV.24, at right.

Table IV.24		
Advertised Pet Policies		
State of Wyoming		
Craigslst Data, April 28 - March 3, 2011		
	No Pets	Pets
Housing/Apartments	20	47
Room/Shared	1	8
Total	21	55

As shown in Table IV.25, below, no housing was advertised as wheelchair accessible. These data suggest that there may be a shortage of suitable housing for those who use an ambulatory device or perhaps that wheelchair accessible units may be more difficult to find in the state.

Table IV.25	
Advertised Wheel Chair Access	
State of Wyoming	
Craigslst Data, April 28 - March 3, 2011	
Type	Number of Advertisements listing Wheelchair Access
Room/Shared	0
Housing/Apartments	0
Total	0

Because most of the listings for apartments and homes were posted by large leasing companies and very little questionable phrasing was found in this data set, these findings suggest that these larger leasing establishments are aware of fair housing laws in advertising and do not advertise in a discriminatory manner.

FAIR HOUSING SURVEY – PRIVATE SECTOR RESULTS

Additional evaluation of fair housing within the State of Wyoming was conducted via a survey of stakeholders. The purpose of the 2011 Wyoming fair housing survey, a relatively more qualitative component of the AI, was to gather insight into knowledge, experiences, opinions and feelings of stakeholders and interested citizens regarding fair housing, as well as to gauge the ability of informed and interested parties to understand and affirmatively further fair housing. Results and comments related to questions regarding fair housing in the private sector are presented below, and additional survey results are discussed in Sections V and VI. Because

fair housing issues are not constrained by political boundaries, results for the entire state are presented and discussed, but tables that tabulate responses for the entitlement and non-entitlement areas are presented in Appendix F.

More than 430 persons in the state completed the survey, which was conducted mostly online. Individuals solicited for participation included representatives of: housing groups, minority organizations, disability resource groups, real estate and property management associations, banking entities, and other groups involved in the fair housing arena. Most questions in the survey required simple “yes,” “no,” or “don’t know” responses, although many questions allowed the respondent to offer written comments. While the numerical tallies of results are presented in this section along with summaries of some comment-driven questions, a complete listing of written responses is available in Appendix F of this report.

FAIR HOUSING IN THE PRIVATE SECTOR

In order to address perceptions of fair housing in Wyoming’s private housing sector, survey respondents were asked to identify their awareness of possible housing discrimination issues in a number of areas within the private housing sector including the:

- Rental housing market,
- Real estate industry,
- Mortgage and home lending industry,
- Housing construction or accessible housing design fields,
- Home insurance industry,
- Home appraisal industry, and
- And other housing services.

If respondents indicated affirmatively that they were aware of possible discriminatory issues in any of these areas, they were asked to further describe issues in a narrative fashion. Tallies for each question are presented in Table IV.26, below.

Table IV.26					
Fair Housing in the Private Sector					
State of Wyoming					
2011 Fair Housing Survey Data					
Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
The rental housing market?	29	217	43	147	436
The real estate industry?	14	239	35	148	436
The mortgage and home lending industry?	21	220	46	149	436
The housing construction or accessible housing design fields?	13	209	66	148	436
The home insurance industry?	5	207	75	149	436
The home appraisal industry?	10	213	63	150	436
Any other housing services?	6	204	74	152	436

Rental Housing

In regard to questionable practices or barriers to fair housing choice in the rental housing market, a total of 29 respondents noted that they were aware of fair housing issues in this area. This suggests that, of those who answered the question, roughly 10.0 percent showed awareness of possible discrimination in the rental market.

As indicated previously, respondents were also asked to discuss these questionable practices or barriers specifically in narrative format. While several comments related to a lack of affordable housing, this item is more closely related to housing production and does not fit the definition of an impediment to fair housing choice unless disproportionately impacting one or more protected classes. The same issue applied to comments that addressed classes of persons that are not protected in Wyoming including age, marital status and credit history. Comments were synthesized and a number of issues were discovered; they are presented below.

- Refusal to rent based on familial status, race, national origin and sex,
- Denial of availability of vacant units based on gender, religion or familial status,
- Indication of rental preferences based on familial status and disability,
- Refusal to make reasonable accommodations for persons with disabilities including failure to allow support animals,
- Occupancy standards.

Real Estate Industry

A total of 14 respondents noted awareness of questionable practices or barriers to fair housing choice in the real estate industry; this total represented nearly 5.0 percent of respondents who answered this question. Of those who indicated awareness of questionable practices or barriers to fair housing choice in the real estate market, several offered more detailed explanations of these issues. Again, many comments related to housing production issues, such as lack of affordable housing, but these issues do not necessarily qualify as impediments to fair housing based on HUD's definition. Comments included:

- Refusal to show available properties based on familial status, race, disability and national origin,
- Deed restrictions,
- Preferences made in advertising.

Mortgage and Home Lending Industry

In regard to questionable practices or barriers to fair housing choice in the lending or mortgage industries, a total of 21 respondents noted that they were aware of fair housing issues in this area. Thus, more than 7.0 percent of persons who answered this question showed awareness of possible discrimination in the lending or mortgage markets. Select comments are presented below.

- Different closing costs and interest rates offered to different groups,
- Refusal to lend based on race, ethnicity, sex and disability.

Housing Construction or Accessible Housing Design Fields

Questionable practices or barriers to fair housing choice in the housing construction or accessible housing design fields were also addressed in the survey. Only 13 respondents were aware of fair housing issues in these fields, which equated to slightly more than 4.5 percent of persons who answered this question. Persons who were aware of issues in the housing construction or accessible housing design fields were also asked to provide specific examples of these issues. These items, as gathered from the comments, are presented below.

- Failure to make units compliant with local codes related to standards for persons with disabilities,
- Units are designed that are not in line with the Americans with Disabilities Act.

Home Insurance Industry

A total of five respondents or under 2.0 percent of all those who answered this question noted questionable practices or barriers to fair housing choice in the home insurance industry. No comments that qualified as fair housing issues were offered.

Home Appraisal Industry

The home appraisal industry was also investigated as part of the survey. Ten respondents noted that they were aware of questionable practices or barriers to fair housing choice in the home appraisal industry, which represented 3.5 percent of all respondents who answered this question. No specific comments received in relation to questionable practices or barriers to fair housing choice in the home appraisal industry were received.

Any Other Private Sector Housing Services

Respondents were also asked to discuss their awareness of barriers to fair housing in any other area of the private housing sector. No issues that were related to impediments to fair housing were identified.

SUMMARY

Home Mortgage Disclosure Act (HMDA) data were used to analyze differences in denial rates in the state by race, ethnicity, gender, income and census tract. Evaluated home purchase loan applications from 2004 through 2009 showed that there were 50,895 home purchase loan originations and 10,848 loan denials, for an average six-year loan denial rate of 17.6 percent. However, denial rates in Casper and Cheyenne were considerably lower than the remainder of the state at 9.8 and 12.8 percent, respectively, compared to 20.6 percent in the remainder of the state. These HMDA data also showed that American Indian, black and Hispanic applicants experienced significantly higher rates of loan denials than white or Asian applicants, even after correcting for income. The same pattern was found of higher denial rates for minority racial and ethnic groups in the remainder of the state and lower denial rates in the entitlement cities. For example, American Indians experienced a denial rate of 40.5 percent in the remainder of the state, but this group experienced denial rates of 17.8 percent in Casper and 17.4 percent in Cheyenne. Further, these highly denied racial and ethnic groups appear to have been

disproportionately impacted in some geographic areas of the remainder of the state where denial rates at times exceeded 75.0 percent.

Analysis of originated loans was also performed to examine the frequency of high annual percentage rate loans (HALs). HALs represent lower quality, higher cost loans, and data showed that American Indian, black and Hispanic populations were also disproportionately impacted by a higher share of these potentially predatory loans. Subsequently, these groups may face a greater burden of foreclosure. Furthermore, loan data in Casper, Cheyenne and the remainder of the state showed that minority applicants in the non-entitlement areas of the state were more likely to procure a higher portion of these riskier loans.

Fair housing complaint data were collected from HUD, and data from this source showed that less than 80 complaints were filed in the state from 2005 through 2010 with 15 counted in Casper, 15 in Cheyenne, and 47 in the remainder of the state. The protected classes appearing to be disproportionately impacted by discrimination in successfully conciliated complaints included both mental and physical disability as well as persons of Native American race and Hispanic ethnicity. The most frequent discriminatory issues were found in the rental market and were noted to include discriminatory refusal to rent, failure to make reasonable accommodation, discrimination in terms, conditions and privileges in relation to rental and discriminatory advertisements, statements or notices. Complaint data in the non-entitlement areas of the state aligned roughly with the trends found in the overall statewide complaint data.

A review of housing advertisements posted on the Craigslist website for the State of Wyoming from one week at the end of March and beginning of April, 2011, revealed that there were few issues of preferential language or possible discriminatory advertising of rental housing.

Results from a fair housing survey that was conducted as part of the AI process showed that many respondents see possible issues of housing discrimination in Wyoming's private housing sector including refusal to rent and failure to make reasonable accommodations in the rental market as well as failure to provide fair lending practices in the home mortgage market. Additional issues included refusal to show properties in the home purchase market as well as failure to construct housing that meets disability requirements. Comments received from the survey demonstrated some misunderstanding of impediments to fair housing choice in relation to HUD's definition of impediments as actions, omissions or decisions that restrict housing choice due to protected class status.

SECTION V. FAIR HOUSING IN THE PUBLIC SECTOR

While the previous section presented information about the status of fair housing in the private sector, such as in the rental and lending markets, this section will focus specifically on the fair housing situation in the public sector. HUD recommends that the AI investigate a number of areas within the public housing sector including health and safety codes and construction standards, zoning and land use policies, tax policies, and development standards. The AI should also examine access to government services as well as possible issues with any local housing authorities. These areas were examined through the use of a fair housing survey and also a public policy survey of officials representing the non-entitlement areas of the state.

FAIR HOUSING SURVEY – PUBLIC SECTOR RESULTS

Additional evaluation of fair housing within the State of Wyoming was conducted via a survey of stakeholders in the state. The purpose of the 2011 Wyoming fair housing survey, a relatively more qualitative component of the AI, was to gather insight into knowledge, experiences, opinions and feelings of stakeholders and interested citizens regarding fair housing, as well as to gauge the ability of informed and interested parties to understand and affirmatively further fair housing. Results and comments related to questions regarding fair housing in the private sector are presented below, and additional survey results are discussed in Sections V and VI. Because fair housing issues are not constrained by political boundaries, results for the entire state are presented and discussed, but tables that separate responses for the entitlement and non-entitlement areas are presented in Appendix F.

More than 430 persons in the state completed the survey, which was conducted mostly online. Individuals solicited for participation included representatives of: housing groups, minority organizations, disability resource groups, real estate and property management associations, banking entities, and other groups involved in the fair housing arena. Most questions in the survey required simple “yes,” “no,” or “don’t know” responses, although many questions allowed the respondent to offer written comments. While the numerical tallies of results are presented in this section along with summaries of some comment-driven questions, a complete listing of written responses is available in Appendix F of this report.

FAIR HOUSING IN THE PUBLIC SECTOR

The public sector can be fairly complex, so the questions in this section asked respondents to think about possible questionable practices or barriers to fair housing choice within very specific areas of this sector. The list of areas presented for respondents was as follows:

- Zoning laws,
- Land use policies,
- Occupancy standards or health and safety codes,
- Property tax policies,
- Housing construction standards,
- Neighborhood or community development policies,
- Access to government services,

- Public housing authorities, and
- Any other public administrative actions or regulations.

If respondents indicated affirmatively that they were aware of possible discriminatory issues in any of these areas, they were asked to further describe issues in a narrative fashion. Tallies for each question are presented in Table V.1, below.

Table V.1					
Fair Housing in the Public Sector					
State of Wyoming					
2011 Fair Housing Survey					
Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
Zoning laws?	13	223	39	161	436
Land use policies?	7	226	43	160	436
Occupancy standards or health and safety codes?	15	215	46	160	436
Property tax policies?	5	222	46	163	436
Housing construction standards?	6	217	49	164	436
Neighborhood or community development policies?	7	213	55	161	436
Limited access to government services, such as employment services?	15	207	44	170	436
Compliance issues with any public housing authority?	2	225	43	166	436
Public administrative actions or regulations?	8	186	80	162	436

Zoning Laws

In regard to questionable practices or barriers to fair housing choice in zoning laws, a total of 13 respondents noted that they were aware of fair housing issues in this area. This suggests that, of those who answered the question, nearly 5.0 percent of respondents showed awareness of possible discrimination in zoning laws within Wyoming. As indicated previously, respondents were also asked to discuss these questionable practices or barriers specifically in narrative format. Comments were then synthesized and a number of common themes were collected. These comments are presented below.

- Not in My Backyard (NIMBY) tendencies for special housing developments,
- Some discriminatory zoning ordinances remain in effect.

Land Use Policies

Land use policies were also investigated as part of the survey. In total, seven respondents or 2.5 percent of those who answered this question noted awareness of questionable practices or barriers to fair housing choice in land use policies. Narrative comments received in relation to this question did not relate to impediments to fair housing choice based on HUD's definition.

Occupancy Standards or Health and Safety Codes

Fifteen respondents noted awareness of fair housing issues in occupancy standards or health and safety codes in the state. This suggests that, of those who answered the question, more than 5.0 percent showed awareness of possible discrimination in this area. As indicated previously, respondents were also asked to discuss these questionable practices or barriers specifically in narrative format. Comments were then synthesized and a selection of issues is presented below.

- Housing choice may be compromised when unrelated adults are not allowed to live in the same unit,
- Some areas of the state may not have clear occupancy standards.

Property Tax Policies

Questions related to questionable practices or barriers to fair housing choice in property tax policies showed that five respondents were aware of such issues, although no comments that were offered related specifically to impediments to fair housing.

Housing Construction Standards

A total of six respondents were aware of questionable practices or barriers to fair housing choice in housing construction standards. Again, no comments specifically related to fair housing were offered.

Neighborhood or Community Development Policies

Seven respondents noted awareness of questionable practices or barriers to fair housing choice in neighborhood or community development policies. Specific comments referenced:

- Discouragement of approval for permits for expansion of housing for special needs populations;
- Some subdivisions have outdated covenants that exclude protected classes based on color.

Limited Access to Government Services

The survey was also used to examine awareness of situations wherein groups face limited access to government services including public transportation, public housing and employment services. Fifteen respondents noted limited access to these services as a problem in Wyoming and specific comments that were provided included:

- Access to public housing services may be difficult to obtain for disabled persons.

Compliance Issues with Public Housing Authorities

Only two respondents noted awareness of compliance issues with public housing authorities in the state. No comments that were provided related to impediments to fair housing choice.

Any Other Public Administrative Actions or Regulations

Respondents were also asked to discuss their awareness of barriers to fair housing in any other public administrative actions or regulations. Eight respondents were aware of other issues. Comments included steering in placement of low income housing options, excessive requirements for continuation courses for insurance brokers, and a lack of a state fair housing law.

NON-ENTITLEMENT COMMUNITY SURVEY

In addition to the 2011 Wyoming fair housing survey, a second survey was conducted to examine the zoning and land use policies and practices in the non-entitlement areas of the state. The non-entitlement community survey was developed to attempt to identify the scope of barriers to fair housing choice within policies and practices in the public sector.

Fair housing laws seek to protect classes of people with certain attributes from discrimination, such as individuals with disabilities or families with children. In order to protect these classes it is helpful to have accurate definitions of these protected classes. Table V.2, below shows the results of respondents when they were asked if their jurisdiction had a definition of family, residential unit, or disability.

Table V.2					
Does your jurisdiction have, by ordinance, policy or practice, a definition of:					
State of Wyoming					
2011 Non-Entitlement Community Survey Data					
Definition	Yes	No	Don't Know	Missing	Total
Family	17	7	2	.	26
Residential Unit	22	2	1	1	26
Disability	4	18	3	1	26

As seen above, 17 respondents or 65.3 percent of respondents indicated there was a definition of a family by policy, practice or ordinance. Definitions of families varied by place, but the most common definition was either an individual or two or more persons related by blood or marriage living in a single housekeeping unit. Several definitions of family also included a group of up to four or five individuals living together as a single housekeeping unit. The former definition may be construed to be discriminatory toward persons living together in service-related situations such as in group homes, while the latter resolves that issue.

There were 22 respondents or 88.0 percent or all respondents who said there was a definition of residential unit by policy, practice or ordinance. The most common definition of residential unit was: a dwelling unit with one or more rooms providing complete living facilities for one family including areas for cooking, living and sleeping purposes. A residential unit was often defined separately from a "dwelling," which usually was defined as a building arranged or intended to be occupied by one or more families.

Unlike previous definitions, most respondents did not indicate they were aware of a jurisdictional definition of disability. However, by practice the State definition of disability would be applied when circumstances require.

The next set of questions asked respondents about standards of various areas of public housing policy. As seen in Table V.3, on the following page, several issues were raised regarding dwelling standards.

Table V.3
Does your jurisdiction have, by ordinance, policy or practice:
 State of Wyoming
 2011 Non-Entitlement Community Survey Data

Question	Yes	No	Don't Know	Missing	Total
Residential occupancy standards or limits on residential occupancies?	11	11	4	.	26
Development standards for making housing accessible to persons with disabilities?	12	10	4	.	26
A process by which persons with disabilities can request reasonable accommodations to the jurisdiction's codes, rules, policies, practices or services necessary to afford persons with disabilities an equal opportunity to use or enjoy a dwelling?	12	6	8	.	26
Standards for the development of senior housing?	5	17	4	.	26

The first question asked respondents if their jurisdiction has policies or ordinances regarding residential occupancy standards or limits on residential occupancies. Of all respondents, 42.3 percent of respondents or 11 persons indicated yes. Most respondents said occupancy standards are based on zoning codes, such as single-family zoning or multi-family zoning. Respondents also indicated there is a limit on the number of unrelated adults allowed per dwelling unit but there is no limit on the number of related persons per dwelling unit. A limit on the number of unrelated persons residing together may be construed as discriminatory toward the disabled in a similar fashion as the definition of family identified on the previous page.

There were 12 respondents who said there were policies for development standards for making housing accessible to persons with disabilities. Most respondents said these policies are defined by the building codes and the Americans with Disabilities Act. On the local level, respondents indicated people with disabilities can request sidewalk cut outs or ramps from the town council.

Under half of the respondents indicated their local jurisdiction had a process by which persons with disabilities can request reasonable accommodations to the jurisdiction's codes or polices necessary to afford persons with disabilities an equal opportunity to use or enjoy a dwelling. Many jurisdictions have a process where persons with disabilities can request reasonable accommodations, such as from the town council, a board of adjustment, or by filing an application with the city.

Only five respondents indicated there was a policy or ordinance for standards for the development of senior housing. Most respondents indicated their jurisdiction will be including such polices in future updates of the zoning ordinances or the Consolidated Plan. This finding implies that some communities are out of compliance but are attempting to resolve their situation.

Respondents were also asked additional questions about public policy guidelines issued by jurisdictions. Responses to these questions are presented on the following page in Table V.4.

Table V.4
Does your jurisdiction have, by ordinance, policy or practice, guidelines that:
 State of Wyoming
 2011 Non-Entitlement Community Survey Data

Question	Yes	No	Don't Know	Missing	Total
Encourage the development of housing units affordable for low- and/or moderate income households when other market rate housing is being developed?	11	12	3	.	26
Encourage the development of mixed use or mixed income housing?	11	9	6	.	26
Distinguish senior citizen housing from other residential uses?	2	20	4	.	26
For citing and developing housing for "special needs" populations?	5	17	4	.	26
For affirmatively furthering fair housing?	5	12	8	1	26

The first question asked respondents if there were jurisdiction guidelines that encouraged the development of affordable housing units designed for low-and/or moderate income households also known as “inclusionary housing.”

Of the respondents, 11 persons or 42.3 percent indicated there were guidelines or policies that encouraged the development of affordable housing units. Of the respondents who indicated yes, many indicated that there are provisions in the master plan or specific zoning ordinances that encourage development of affordable inclusionary housing.

Eleven respondents also indicated their jurisdiction had guidelines to encourage the development of mixed use or mixed income housing. Most respondents said their jurisdiction had mixed use zoning but few respondents indicated guidelines or policies that encouraged mixed income housing.

Only two respondents said their jurisdiction had policies that distinguished senior citizen housing from other residential uses, but several jurisdictions are in the process of including senior housing policies in future zoning ordinances or Consolidated Plans.

There were only five respondents who indicated that their jurisdiction has policies or guidelines for citing and developing housing for “special needs” populations. Again respondents indicated their jurisdiction had zoning codes in place to allow for these types of housing units, but there was little indication of proactive policies designed to develop housing for “special needs” populations.

The last question of the survey asked if jurisdictions had policies or guidelines for affirmatively furthering fair housing. Five respondents indicated yes, which represented only 20.0 percent of total respondents. Although only a few respondents indicated there are active policies in place for affirmatively furthering fair housing, many respondents indicated their jurisdiction was aware of fair housing laws and makes every attempt to protect their citizens from housing discrimination.

SUMMARY

The status of affirmatively fair housing within Wyoming's public fair housing sector was primarily evaluated through the use of two surveys: a fair housing survey and a survey of zoning and land use policies and practices.

Analysis of comments received in the fair housing survey showed that there are possible issues of resistance to development of housing for special needs populations, possible discriminatory zoning ordinances, and restrictive occupancy standards.

Results of responses to the non-entitlement community survey showed that while several local governments throughout the state have made strides to resolve public policies or practices that may represent barriers to fair housing choice, some residual issues remain in relation to unclear definitions of "disability" or "family" as well as ambiguous or questionable language in occupancy or development standards.

SECTION VI. PUBLIC INVOLVEMENT

This section discusses analysis of fair housing in Wyoming as gathered from various public involvement efforts conducted as part of the AI process in the state including additional survey data as well as feedback collected from public input sessions.

FAIR HOUSING SURVEY

As discussed in previous sections, the 2011 fair housing survey comprised a large portion of the public involvement efforts associated with the development of the Wyoming AI. While data from the survey regarding policies and practices within the private and public sectors in Wyoming have already been discussed, the remaining survey findings are presented in the narrative below. Again, because fair housing issues can carry across political boundaries, results for the entire state are discussed herein, but separate results for the entitlement and non-entitlement areas of the state are presented in Appendix F.

Additional evaluation of fair housing within the State of Wyoming was conducted via a survey of stakeholders in the state. The purpose of the 2011 Wyoming fair housing survey, a relatively more qualitative component of the AI, was to gather insight into knowledge, experiences, opinions and feelings of stakeholders and interested citizens regarding fair housing, as well as to gauge the ability of informed and interested parties to understand and affirmatively further fair housing. Results and comments related to questions regarding fair housing in the private sector are presented below, and additional survey results are discussed in Sections IV and V.

More than 430 persons in the state completed the survey, which was conducted mostly online. Individuals solicited for participation included representatives of: housing groups, minority organizations, disability resource groups, real estate and property management associations, banking entities, and other groups involved in the fair housing arena. Most questions in the survey required simple “yes,” “no,” or “don’t know” responses, although many questions allowed the respondent to offer written comments. While the numerical tallies of results are presented in this section along with summaries of some comment-driven questions, a complete listing of written responses is available in Appendix F of this report.

Respondents to the fair housing survey were asked to identify their primary role within the housing industry. As shown in Table IV.1, at right, 48 respondents identified themselves as being part of the banking or finance industry, while 33 respondents were identified as working in real estate and an additional 26 respondents were counted as working within local government.

Table VI.2, on the following page, shows the responses made to a number of questions regarding federal, state and local fair housing laws. The other items that were noted included other items such a

Role	Total
Banking/Finance	48
Real estate	33
Local government	26
Concerned citizen	22
Property management	20
Advocate/Service Provider	16
Construction/Development	7
Missing	3
Other (please specify)	261
Total	436

Table VI.2					
Federal, State and Local Fair Housing Laws					
State of Wyoming					
2011 Fair Housing Survey					
Questions	Yes	No	Don't Know	Missing	Total
Do you think fair housing laws are useful?	275	17	23	121	436
Are fair housing laws difficult to understand or follow?	69	215	32	120	436
Is there a training process available to learn about fair housing laws?	238	16	.	182	436
Have you participated in fair housing training?	227	33	.	176	436

The first question asked respondents to indicate their understanding of the usefulness of fair housing laws in Wyoming. As shown, the majority of respondents answered affirmatively and only 17 respondents said that they did not believe fair housing laws are useful. Respondents were also asked if fair housing laws are difficult to understand or follow. As shown in the same table, most respondents, 68.0 percent, noted that fair housing laws are easy to understand or follow.

Accessibility to fair housing training was also examined in the survey. As shown in Table VI.2, 93.7 percent of persons who responded to this question were aware of fair housing training services. Additionally, respondents were asked to indicate if they personally had participated in fair housing training. More than 87.0 percent of respondents said that they had taken part in some kind of fair housing training in the past. This finding suggests that the stakeholders who responded to this survey are very aware of avenues for learning about fair housing laws and also have a high participation rate in fair housing education activities.

As part of the process of measuring understanding of fair housing law through the survey instrument, respondents were asked to list their awareness of classes of persons protected by fair housing law on a federal, state and local level. Race and disability were offered as examples of protected classes in the question narrative. Results of this question are presented above, at right in Table VI.3 and show that while many respondents were able to correctly identify the protected classes of religion, familial status, sex, national origin and color, comments also included a number of groups that have no such protections in the State of Wyoming including age, marital status, gender and sexual orientation.

Respondents were also asked to suggest where they would refer a person with a fair housing complaint. The purpose of this question was to identify if respondents were aware of the appropriate complaint venues within the fair housing system in the state. Most respondents were correctly able to suggest HUD as a referral organization, although many respondents said that they did not know or offered less appropriate agencies such as the real estate commission or a housing authority.

Table VI.3	
Protected Classes	
Identified by Respondents	
State of Wyoming	
2011 Fair Housing Survey	
Protected Classes	Total
Religion	191
Familial Status	163
Sex	154
National Origin	150
Color	142
Age	67
Race	42
Marital Status	39
Gender	25
Sexual Orientation	24
Handicap	20
Creed	16
Disability	15
Ethnicity	10
Handicap	4
Ancestry	2
Elderly	2
Income	2
Other	50

Table VI.4	
Suggested Referrals	
State of Wyoming	
2011 Fair Housing Survey	
Referral	Total
HUD	126
Don't know	34
Real Estate Commission	30
Fair Housing Office	18
Attorney	14
City	3
Housing Authority	3
Internet	3
Court	2
FHA	2
State of Wyoming	1
WCDA	1
Other	19
Total	256

Table IV.5 shows the results of questions that addressed fair housing activities in Wyoming. When asked if they were aware of any fair housing testing in the state, respondents mostly indicated that they were not aware of any fair housing testing. Interestingly, very few respondents chose to answer the following question which inquired if there is sufficient fair housing testing in the state. This suggests that there is not a high level of awareness of fair housing testing in Wyoming, so respondents were not sure if the testing levels are sufficient or not. Regardless, most respondents who answered this question said that there is a sufficient level of fair housing testing. When asked if there is sufficient fair housing outreach and education activities in the state, 25.0 percent of respondents who answered this question said that these activities are currently insufficient while 41.4 percent said that activities are sufficient.

Table IV.5						
Fair Housing Activities						
State of Wyoming						
2011 Fair Housing Survey						
Questions		Yes	No	Don't Know	Missing	Total
Are you aware of any fair housing testing?		67	138	56	175	436
	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient testing?	9	38	4	61	324	436
Is there sufficient outreach and education activity?	65	108	8	80	175	436

Table IV.6 shows tallied responses to survey questions related to the status of fair housing in Wyoming. First, respondents were asked if they were aware of a fair housing plan in the state. Many respondents, 148 persons total, noted that they were aware of a fair housing plan in the State of Wyoming.

Respondents were also asked to offer information about any specific geographic areas within Wyoming that might have increased fair housing problems. Less than 5.0 percent of respondents who answered this question noted that certain geographic areas of the state have fair housing issues. Respondents were also encouraged to list specific areas that they might be referring to and these comments included: smaller communities, college towns, and American Indian reservation lands.

The effectiveness of fair housing laws in Wyoming was addressed in the final survey question. A total of 144 respondents indicated that fair housing laws in the state are effective and only 13 respondents indicated that these laws may be ineffective. Respondents were asked to offer written comments regarding ways that fair housing laws could be changed. Comments suggested: adoption of a state fair housing law along with a state fair housing agency to allow for educational opportunities in additional to compliance efforts.

Table IV.6						
Status of Fair Housing						
State of Wyoming						
2011 Fair Housing Survey						
Question		Yes	No	Don't Know	Missing	Total
Are you aware of a fair housing plan in Wyoming?		54	148	57	177	436
Are there geographic areas in Wyoming that have fair housing problems?		12	40	207	177	436
Are fair housing laws in Wyoming effective?		144	13	104	175	436

Before the close of the survey, respondents were asked to offer any additional fair housing concerns or issues they would like to address. Comments related to the following ideas:

- Increased enforcement of fair housing laws is needed;
- There is a lack of educational opportunity to learn about the complaint process for housing consumers;
- There is a lack of extensive fair housing training for professionals.

FAIR HOUSING FORUMS

A public input opportunity, or fair housing forum, was held in Cheyenne on April 5, 2011. The purpose of the forum was to allow the public the chance to learn more about the AI process including why the AI is conducted as well as what preliminary findings were discovered. Comments, including reactions to the initial list of impediments and suggestions for proposed actions, were accepted from anyone in attendance. A complete narrative of comments is presented in Section E of this report, but a list of comments that are related to barriers to fair housing choice is presented below.

The fair housing complaint system is inaccessible in Wyoming.

Comments from the forum included anecdotal evidence regarding the difficulty one citizen had in filing a fair housing complaint. The complainant was told by a real estate agent that there are no agencies in Wyoming that accept fair housing complaints.

American Indians are denied housing due to location on trust lands

Other comments suggested that American Indian groups are denied mortgages frequently due to the fact that the house will be located on trust lands. Another comment was made that noted that the State is currently undertaking efforts to fix this issue and allow American Indians to own trust land that will be converted to developable land.

FINAL PRESENTATION

During the public review period, findings and results of the AI were presented to the public on June 22, 2011. The presentation was broadcast via video conferencing to sixteen locations throughout the state including Basin, Casper, Cheyenne, Cody, Douglas, Evanston, Gillette, Jackson, Kemmerer, Lander, Laramie, Rawlins, Riverton, Rock Springs, Sheridan, and Torrington. No comments were received from these presentations.

SUMMARY

Public input opportunities were an intrinsic part of the development of this AI. Activities included a fair housing survey to evaluate current fair housing efforts and fair housing forums wherein citizens were offered the chance to comment on initial findings of the AI and offer feedback on prospective impediments.

Results of the fair housing survey, which was completed by 436 persons in the state, showed that most respondents feel that fair housing laws are useful and that they are not difficult to understand or follow. Slightly more than 90.0 percent of respondents said that they were aware of fair housing training and 87.0 percent of respondents said that they had taken part in some kind of fair housing training, which suggests that education opportunities are available and utilized. However, respondents showed some unfamiliarity with the classes of persons protected by federal fair housing laws as well as where to refer someone with a housing complaint. Many respondents also did not seem to be aware of fair housing testing activities.

A fair housing forum held in April in Casper allowed citizens to voice concerns about barriers to fair housing choice. Comments from these sessions indicated problems of a lack of accessibility in the fair housing complaint system as well as denial of housing opportunities for American Indians living on trust lands.

Results of the AI were presented to sixteen locations throughout the state via video conferencing on June 22, 2011.

SECTION VII. SUMMARY OF RESEARCH CONCLUSIONS

Data from the U.S. Census Bureau showed that between 2000 and 2010 the population in the State of Wyoming increased substantially from 493,782 to 563,626 persons or by 14.1 percent. The white population in the state grew by the largest total amount of persons but fell in total share of population between 2000 and 2010 from 92.1 percent to 90.7 percent. All other racial groups showed small gains in population of less than 0.5 percent each, but the Hispanic ethnic population grew from 6.4 percent of the population in 2000 to 8.9 percent of the population in 2010. The remainder of the state showed a 2.5 percent increase in the Hispanic population from 2000 to 2010, while Casper and Cheyenne both showed an increase of 2.0 percent. Some racial and ethnic populations were geographically concentrated in certain areas of the state in 2010, specifically near cities such as Jackson, Green River, and Rawlins, where a few census tracts showed more than 25.0 percent of the population as Hispanic. Persons living with a disability as well as persons living in poverty were also found to be concentrated in some areas of the state.

A review of the fair housing profile in the State of Wyoming revealed that the U.S. Department of Housing and Urban Development (HUD), including a regional office in Denver and a field office in Casper, offers fair housing services in Wyoming including complaint and compliance review. However, no state fair housing agency or HUD grant recipient exists within the state. Furthermore, despite past efforts, no state fair housing law exists.

Examination of both national fair housing studies and cases supported the idea that while housing discrimination activity may have declined in recent years, disabled persons and racial and ethnic minorities remain commonly affected victims of housing discrimination.

Home Mortgage Disclosure Act (HMDA) data, regarding denial rates in the state by race, ethnicity, gender, income and census tract, showed that from 2004 through 2009 there were 50,895 home purchase loan originations and 10,848 loan denials, for an average six-year loan denial rate of 17.6 percent. However, denial rates in Casper and Cheyenne were considerably lower than the remainder of the state at 12.8 and 9.8 percent, respectively, compared to 20.6 percent in the remainder of the state. These HMDA data also showed that American Indian, black and Hispanic applicants experienced significantly higher rates of loan denials than white or Asian applicants, even after correcting for income. The same pattern of higher denial rates for minority racial and ethnic groups in the remainder of the state and lower denial rates in the entitlement cities. For example, American Indians experienced a denial rate of 40.5 percent in the remainder of the state, but this group experienced denial rates of 17.8 percent in Cheyenne and 17.4 percent in Casper. Further, these three highly denied racial and ethnic groups appear to have been disproportionately impacted in some geographic areas of the remainder of the state where denial rates at times exceeded 75.0 percent.

Analysis of high annual interest rate lending showed that American Indian, black and Hispanic populations experienced a higher share of these potentially predatory loans. Subsequently, these groups may face a greater burden of foreclosure. Furthermore, loan data in Casper, Cheyenne and the remainder of the state showed that minority applicants in the non-entitlement areas of the state were more likely to procure a higher portion of these riskier loans.

Fair housing complaint data collected from HUD showed that less than 80 complaints were filed in the state from 2005 through 2010 with 15 counted in Casper, 15 in Cheyenne, and 47 in the remainder of the state. The protected classes appearing to be disproportionately impacted by discrimination in successfully conciliated complaints included both mental and physical disability as well as persons of Native American race and Hispanic ethnicity. The most frequent discriminatory issues were found in the rental market and were noted to include discriminatory refusal to rent, failure to make reasonable accommodation, discrimination in terms, conditions and privileges in relation to rental and discriminatory advertisements, statements, or notices. Complaint data in the non-entitlement areas of the state aligned roughly with the trends found in the overall statewide complaint data.

A review of housing advertisements posted on the Craigslist website for the State of Wyoming from one week at the end of March and beginning of April, 2011 revealed that there were few issues of preferential language or possible discriminatory advertising of rental housing.

Results from a fair housing survey that was conducted as part of the AI process demonstrated that many respondents see possible issues of housing discrimination in Wyoming's private housing sector including refusal to rent and failure to make reasonable accommodations in the rental market as well as failure to provide fair lending practices in the home mortgage market. Additional issues included refusal to show properties in the home purchase market as well as failure to construct housing that meets disability requirements. Comments received from the survey demonstrated some misunderstanding of impediments to fair housing choice in relation to HUD's definition of impediments as actions, omissions or decisions that restrict housing choice due to protected class status.

Results from the public sector section of the fair housing survey showed that there are possible issues of resistance to development of housing for special needs populations, possible discriminatory zoning ordinances, and restrictive occupancy standards.

Responses to the non-entitlement community survey illustrated that while several local governments throughout the state have made strides to resolve public policies or practices that may represent barriers to fair housing choice, some residual issues remain in relation to unclear definitions of "disability" or "family" as well as ambiguous or questionable language in occupancy or development standards.

Residual results of the fair housing survey showed that most respondents feel that fair housing laws are useful and that they are not difficult to understand or follow. Slightly more than 90.0 percent of respondents said that they were aware of fair housing training and 87.0 percent of respondents said that they had taken part in some kind of fair housing training, which suggests that education opportunities are available and utilized. However, respondents showed some unfamiliarity with the classes of persons protected by federal fair housing laws as well as where to refer someone with a housing complaint. Many respondents also did not seem to be aware of fair housing testing activities.

Comments from a fair housing forum held in April in Cheyenne suggested problems of a lack of accessibility in the fair housing complaint system as well as denial of housing opportunities for American Indians living on trust lands.

SECTION VIII. IMPEDIMENTS AND SUGGESTED ACTIONS

IMPEDIMENTS TO FAIR HOUSING CHOICE AND SUGGESTED ACTIONS

Provisions to affirmatively furthering fair housing are long-standing components of HUD's housing and community development programs. In exchange for receiving federal funds from HUD, the State of Wyoming certifies that it is affirmatively furthering fair housing. The requirements of such certification comprise the following elements:

1. Conduct an Analysis of Impediments to Fair Housing Choice;
2. Take actions to remedy impediments, if impediments are identified;
3. Maintain records of the analysis and actions taken.

The first element in the certification process noted above has resulted in several impediments to fair housing choice. HUD's definition of an impediment, reprinted here from the *Fair Housing Planning Guide*, page 2-6, that that "Impediments to fair housing choice are:

- Actions omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices
- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin."

While numerous housing issues were uncovered in the process of conducting this AI, only those issues that were shown to qualify as possible impediments to fair housing choice based on the definition printed immediately above were identified.

These items are listed below for both the private and public housing sectors and are accompanied by specific actions that the State will follow to attempt to remedy these issues.

Impediments to Fair Housing Choice

Private Sector

1. Denial of available housing units in the rental markets
2. Discriminatory refusal to rent
3. Discriminatory terms, conditions or privileges relating to rental
4. Failure to make reasonable accommodations or modifications
5. Preferences stated in advertisements for rental housing
6. Denial of availability of housing in the home purchase markets
7. Denial of home purchase loans
8. Occurrence of predatory lending activities in the home purchase market
9. Denial of loans specifically for homes within tribal trust lands
10. Steering in the real estate markets
11. Failure to comply with accessibility requirements in construction of housing units

Public Sector

1. Unsuccessful past efforts to enact statewide fair housing law
2. Ineffective enforcement of fair housing laws due to lack of fair housing infrastructure
3. Limited access to fair housing services due to lack of local Fair Housing Initiative Program recipient or state enforcement agency
4. Historical establishment of policies and practices resulting in segregation of minority populations
5. Insufficient establishment and enforcement of building codes regarding special needs housing
6. Decisions regarding definitions of “family,” “dwelling units” and related terms made by cities within the state are inequitable
7. Resistance or Not In My Backyard (NIMBY) sentiment toward development of special needs housing

Impediments Matrix

A matrix was used to more closely detail the source or sources from which the impediments were derived. Table VIII.1, on the following page, lists the impediments, by private and public sector, and demonstrates which sources supported the issue as an impediment to fair housing choice within the non-entitlement areas of Wyoming. The protected classes most often noted to be cited in relation to the impediment have been included as well. Furthermore, the matrix includes a ranking code with “H” indicating a high need for action, “M” indicating a moderate need for action, and “L” indicating a low need for action.

**Table VIII.1
Impediments Matrix**

2011 Wyoming Analysis of Impediments

Impediment	Source										Protected Classes Most Affected	Action Ranking
	Census Data	Review of Fair Housing Profile	Literature/Case Review	HMDA Data	HUD Housing Complaint Review	Advertisement Analysis	Fair Housing Survey	Non-Entitlement Community Survey	Fair Housing Forums	Other		
Private Sector												
Denial of available housing in the rental markets					X		X				Disability, race, national origin, gender, religion, familial status	H
Discriminatory refusal to rent					X		X				Disability, race, national origin, familial status, sex	H
Discriminatory terms, conditions or privileges relating to rental					X						Disability, race, national origin	H
Failure to make reasonable accommodation or modification					X		X				Disability, race, national origin	H
Preferences stated in advertisements					X		X				Disability, race, national origin, familial status	M
Denial of availability of housing in the home purchase market							X				Disability, race, national origin	H
Denial of home purchase loans				X			X		X		Race, national origin, sex, disability	M
Occurrence of predatory lending activities in the home purchase market				X					X		Race, national origin	H
Denial of loans specifically for homes within tribal trust lands									X		Race	M
Steering in the real estate markets							X				Race, national origin	M
Failure to comply with accessibility requirements in construction of housing units							X				Disability	M
Public Sector												
Unsuccessful past efforts to enact statewide fair housing law		X					X				All	M
Ineffective enforcement of fair housing laws due to lack of fair housing infrastructure					X		X		X		All	H
Limited access to fair housing services due to lack of Fair Housing Initiative Program recipient or state enforcement agency							X		X		All	H
Historical establishment or policies and practices resulting in segregation of minority populations	X		X						X		Race, national origin, disability	L
Insufficient establishment and enforcement of building codes regarding special needs housing							X	X			Disability	M
Decisions made regarding definitions of "family," "dwelling unit," and related terms made by cities within the state are inequitable							X	X			Familial status, disability	L
Resistance or Not In My Backyard (NIMBY) sentiment toward development of special needs housing							X				Disability	M

Suggested Actions to Resolve or Ameliorate Impediments

Private Sector

1. Impediment: Denial of available housing units in the rental markets
Suggested Actions: Research need for testing activities; research need for enforcement activities; raise awareness and educate landlords and property management companies in fair housing law; raise awareness and educate housing consumers in fair housing rights
2. Impediment: Discriminatory refusal to rent
Suggested Actions: Research need for testing activities; research need for enforcement activities; raise awareness and educate landlords and property management companies in fair housing law; raise awareness and educate housing consumers in fair housing rights
3. Impediment: Discriminatory terms, conditions or privileges relating to rental
Suggested Actions: Research need for testing activities; research need for enforcement activities; raise awareness and educate landlords and property management companies in fair housing law; raise awareness and educate housing consumers in fair housing rights
4. Impediment: Failure to make reasonable accommodations or modifications
Suggested Actions: Research need for testing activities; research need for enforcement activities; hold training sessions to raise awareness and educate housing providers in requirements regarding reasonable accommodation or modification
5. Impediment: Preferences stated in advertisements for rental housing
Suggested Actions: Raise awareness and educate landlords and property management companies in fair housing law
6. Impediment: Denial of availability of housing in the home purchase markets
Suggested Actions: Research need for testing activities, research need for enforcement activities; raise awareness and educate property sellers, real estate brokers, and real estate agents in fair housing law; raise awareness and educate housing consumers in fair housing rights
7. Impediment: Denial of home purchase loans
Suggested Actions: Determine the location and intensity of discriminatory lending; raise awareness and educate buyers through enhanced home purchase and credit education
8. Impediment: Occurrence of predatory lending activities in the home purchase market
Suggested Actions: Determine the scope of the problem; raise awareness and educate buyers through enhanced home purchase and credit education

9. Impediment: Denial of loans specifically for homes within tribal trust lands
Suggested Actions: Research reasons for denial of loans within tribal trust lands
10. Impediment: Steering in the real estate markets
Suggested Actions: Research need for testing activities; communicate this problem to the Wyoming Real Estate Commission; continue to offer outreach, education and awareness activities for real estate agents; identify fair housing education classes and availability of classes for real estate agents
11. Impediment: Failure to comply with accessibility requirements in construction of housing units
Suggested Actions: Determine the scope of the problem as to whether accessibility requirements are being met in the construction or rehabilitation of housing units; determine how accessibility requirements are being monitored in market rate, non-assisted residential construction projects; research possible outlets for education and awareness opportunities or architects and builders; research sources of funding for rehabilitation of housing units to meet accessibility needs

Public Sector

1. Impediment: Unsuccessful past efforts to enact statewide fair housing law
Suggested Actions: Examine reasons for past failure of fair housing law; determine need for state fair housing law
2. Impediment: Ineffective enforcement of fair housing laws due to lack of state fair housing infrastructure
Suggested Actions: Research feasibility of establishing agency as Fair Housing Assistance Program (FHAP) grant recipient or Fair Housing Initiative Program (FHIP) grant recipient to serve Wyoming
3. Impediment: Limited access to fair housing services due to lack of local Fair Housing Initiative Program recipient or state enforcement agency
Suggested Actions: If FHAP or FHIP agency is established, increase and advertise available complaint venues; raise awareness and educate public on how to file a fair housing complaint with HUD
4. Impediment: Historical establishment of policies and practices resulting in segregation of minority populations
Suggested Actions: Continue to review questionable land use and planning policies and practices in remaining Wyoming communities; conduct outreach, education and awareness activities in the identified communities; encourage appropriate revisions; document changes
5. Impediment: Insufficient establishment and enforcement of building codes regarding special needs housing
Suggested Actions: Encourage local communities to evaluate building codes and revise as needed; document local community progress

6. Impediment: Decisions regarding definitions of “family,” “dwelling units” and related terms made by communities within the state
Suggested Actions: Continue to encourage local communities to reevaluate definitions that may restrict access to housing; provide education and awareness opportunities to communities that may not be in compliance

7. Impediment: Resistance or Not In My Backyard (NIMBY) sentiment toward development of special needs housing
Suggested Actions: Encourage planning decisions that work to decrease segregation and increase integration of these populations; document progress toward these goals

APPENDIX A: ADDITIONAL CENSUS DATA

This section of the document contains additional data from the U.S. Census Bureau for the State of Wyoming.

Table A.1				
Group Quarters Population				
State of Wyoming				
U.S. Census Bureau Data, 2000				
Group Quarters	Casper	Cheyenne	Remainder	Wyoming
Institutionalized				
Correctional Institutions	8	157	4,011	4,176
Nursing Homes	470	472	1,927	2,869
Other Institutions	76	22	718	816
Total	554	651	6,656	7,861
Non-institutionalized				
College Dormitories	331	0	3,519	3,850
Military Quarters	0	0	545	545
Other Non-institutional Group Quarters	341	340	1,146	1,827
Total	672	340	5,210	6,222
Group Quarters Population	1,226	991	11,866	14,083

Table A.2				
Elderly Population by Age				
State of Wyoming				
U.S. Census Bureau Data				
Age	2000 Census		2009 Five-Year ACS	
	Population	% of Total	Population	% of Total
City of Casper				
65 to 66	659	9.8%	584	8.1%
67 to 69	1,048	15.5%	1,204	16.6%
70 to 74	1,899	28.1%	1,446	20.0%
75 to 79	1,506	22.3%	1,507	20.8%
80 to 84	896	13.3%	1,419	19.6%
85 and over	746	11.0%	1,077	14.9%
Total	6,754	100.0%	7,237	100.0%
City of Cheyenne				
65 to 66	798	10.9%	849	11.2%
67 to 69	1,130	15.5%	1,287	17.0%
70 to 74	1,795	24.5%	1,606	21.2%
75 to 79	1,543	21.1%	1,538	20.3%
80 to 84	1,095	15.0%	1,379	18.2%
85 and over	952	13.0%	916	12.1%
Total	7,313	100.0%	7,575	100.0%
Remainder of State				
65 to 66	5,407	12.4%	6,867	14.1%
67 to 69	7,556	17.3%	8,596	17.6%
70 to 74	11,051	25.3%	11,517	23.6%
75 to 79	8,759	20.1%	9,263	19.0%
80 to 84	5,816	13.3%	6,588	13.5%
85 and over	5,037	11.5%	5,961	12.2%
Total	43,626	100.0%	48,792	100.0%
State of Wyoming				
65 to 66	6,864	11.9%	8,300	13.0%
67 to 69	9,734	16.9%	11,087	17.4%
70 to 74	14,745	25.6%	14,569	22.9%
75 to 79	11,808	20.5%	12,308	19.4%
80 to 84	7,807	13.5%	9,386	14.8%
85 and over	6,735	11.7%	7,954	12.5%
Total	57,693	100.0%	63,604	100.0%

APPENDIX B: ADDITIONAL BLS/BEA DATA

This section of the document contains additional Bureau of Labor Statistics (BLS) and Bureau of Economic Data (BEA) data as they pertain to employment and income for the State of Wyoming.

Table B.1 Labor Force Statistics State of Wyoming BLS Data				
Year	Labor Force	Employment	Unemployment	Unemployment Rate
1990	236,043	223,531	12,512	5.3
1991	235,124	223,192	11,932	5.1
1992	238,076	224,562	13,514	5.7
1993	242,599	229,177	13,422	5.5
1994	249,475	236,885	12,590	5.0
1995	253,196	240,846	12,350	4.9
1996	254,717	241,560	13,157	5.2
1997	256,263	243,944	12,319	4.8
1998	260,570	247,748	12,822	4.9
1999	264,676	251,828	12,848	4.9
2000	266,882	256,685	10,197	3.8
2001	269,985	259,508	10,477	3.9
2002	269,654	258,462	11,192	4.2
2003	271,607	259,489	12,118	4.5
2004	273,091	262,358	10,733	3.9
2005	278,183	267,927	10,256	3.7
2006	285,958	276,882	9,076	3.2
2007	291,604	283,543	8,061	2.8
2008	295,592	286,394	9,198	3.1
2009	296,880	277,669	19,211	6.5
2010	293,769	273,313	20,456	7.0

Table B.2
Labor Force Statistics
 City of Casper
 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate
1990	24,255	22,889	1,366	5.6
1991	23,963	22,599	1,364	5.7
1992	23,631	22,005	1,626	6.9
1993	24,149	22,469	1,680	7.0
1994	24,311	22,892	1,419	5.8
1995	24,716	23,392	1,324	5.4
1996	24,725	23,220	1,505	6.1
1997	25,113	23,803	1,310	5.2
1998	25,480	24,168	1,312	5.1
1999	25,932	24,622	1,310	5.1
2000	27,377	26,359	1,018	3.7
2001	27,863	26,862	1,001	3.6
2002	28,062	26,952	1,110	4.0
2003	28,455	27,231	1,224	4.3
2004	28,963	27,926	1,037	3.6
2005	29,493	28,499	994	3.4
2006	30,206	29,331	875	2.9
2007	30,357	29,588	769	2.5
2008	30,558	29,712	846	2.8
2009	29,853	28,144	1,709	5.7

Table B.3
Labor Force Statistics
 City of Cheyenne
 BLS Data

Year	Labor Force	Employment	Unemployment	Unemployment Rate
1990	25,772	24,507	1,265	4.9
1991	25,352	24,342	1,010	4.0
1992	25,981	24,887	1,094	4.2
1993	26,579	25,495	1,084	4.1
1994	27,110	25,995	1,115	4.1
1995	27,228	26,217	1,011	3.7
1996	27,325	26,316	1,009	3.7
1997	27,582	26,588	994	3.6
1998	27,872	26,857	1,015	3.6
1999	28,320	27,341	979	3.5
2000	26,802	25,737	1,065	4.0
2001	26,730	25,559	1,171	4.4
2002	27,212	25,982	1,230	4.5
2003	27,692	26,336	1,356	4.9
2004	27,540	26,208	1,332	4.8
2005	27,726	26,480	1,246	4.5
2006	27,969	26,798	1,171	4.2
2007	28,254	27,161	1,093	3.9
2008	28,396	27,176	1,220	4.3
2009	28,334	26,633	1,701	6.0

Table B.4
Real Earnings by Industry
 State of Wyoming
 BEA Data, 2010 Dollars

NAICS Categories	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	% Change 01-10
Farm earnings	231,872	119,591	211,754	204,255	256,171	106,836	31,134	87,678	46,733	129,358	-62.2%
Forestry, fishing, related activities, and other	56,916	56,073	58,462	58,993	52,806	52,720	52,275	50,593	51,146	54,108	-11.1%
Mining	1,742,580	1,700,515	1,827,167	2,054,106	2,273,851	2,914,749	2,894,742	3,567,974	3,054,515	3,148,442	104.8%
Utilities	(D)	(D)	226,470	233,810	236,738	257,862	261,005	273,420	280,313	288,240	.
Construction	1,288,193	(D)	1,315,226	1,299,076	1,397,895	1,682,368	1,894,376	2,047,834	1,669,839	1,631,300	59.0%
Manufacturing	632,211	(D)	600,848	601,848	617,060	683,275	703,679	730,691	699,238	687,358	15.6%
Wholesale trade	450,830	439,898	463,744	504,306	525,929	592,782	645,487	694,532	646,586	646,716	54.1%
Retail trade	997,496	988,450	1,010,911	1,021,684	1,035,853	1,105,689	1,150,957	1,130,567	1,065,938	1,063,540	13.3%
Transportation and warehousing	(D)	(D)	709,879	751,427	810,496	919,293	973,386	1,013,907	937,159	941,927	.
Information	(D)	(D)	195,227	210,781	198,883	206,170	208,519	212,326	211,885	215,074	.
Finance and insurance	440,647	438,878	446,545	451,930	450,910	498,657	483,468	481,728	454,407	437,961	9.3%
Real estate and rental and leasing	381,139	422,411	383,987	438,703	447,404	428,871	334,573	326,147	303,706	290,036	-14.4%
Professional and technical services	609,700	625,134	594,896	636,658	674,420	742,546	813,081	887,895	849,574	850,200	45.6%
Management of companies and enterprises	50,928	72,440	78,831	86,086	87,314	102,937	98,469	94,549	87,946	107,275	85.7%
Administrative and waste services	293,232	272,239	288,741	274,214	267,393	296,854	335,461	345,082	308,141	306,047	17.7%
Educational services	44,490	57,836	53,945	59,488	58,618	63,271	65,272	69,129	72,938	78,864	55.4%
Health care and social assistance	920,093	975,559	1,022,726	1,085,460	1,086,752	1,137,342	1,213,079	1,333,392	1,380,128	1,422,415	44.9%
Arts, entertainment, and recreation	214,522	233,929	232,827	216,667	199,055	198,932	197,390	194,670	191,941	196,571	-9.3%
Accommodation and food services	513,758	555,307	577,122	616,402	641,669	757,872	758,988	737,119	699,373	704,332	43.5%
Other services, except public administration	(D)	(D)	486,099	485,314	511,040	572,330	646,038	610,696	592,832	623,993	.
Government and government enterprises	3,010,588	3,213,712	3,362,416	3,471,209	3,578,846	3,728,453	3,945,050	4,127,678	4,358,492	4,428,767	37.1%
Total	13,477,885	13,728,993	14,147,824	14,762,419	15,409,102	17,049,809	17,706,428	19,017,609	17,962,828	18,252,524	41.1%

Table B.5
Employment by Industry
 State of Wyoming
 BEA Data

NAICS Categories	2001	2002	2003	2004	2005	2006	2007	2008	2009	% Change 01-09
Farm employment	12,447	13,160	12,124	11,837	11,523	11,180	12,584	12,682	12,502	1.9%
Forestry, fishing, related activities, and other	2,601	2,658	2,516	2,631	2,594	2,563	2,669	2,779	2,822	6.8%
Mining	20,671	20,128	21,434	23,019	25,413	29,950	31,668	34,974	33,273	69.2%
Utilities	(D)	(D)	2,168	2,232	2,312	2,355	2,524	2,574	2,566	.
Construction	27,291	(D)	27,270	27,378	29,522	33,248	36,363	37,976	33,273	39.2%
Manufacturing	11,404	(D)	10,706	10,873	11,217	11,789	11,961	11,661	10,788	2.3%
Wholesale trade	7,741	7,814	7,785	8,236	8,708	9,172	9,683	10,062	9,663	30.0%
Retail trade	39,010	38,907	38,962	38,905	39,560	40,041	41,266	41,103	39,111	5.4%
Transportation and warehousing	(D)	(D)	11,683	12,213	12,936	13,929	14,917	14,982	14,231	.
Information	(D)	(D)	4,831	5,003	5,067	4,935	4,793	4,782	4,744	.
Finance and insurance	10,302	10,904	11,172	11,333	11,535	11,738	13,193	15,211	16,625	47.7%
Real estate and rental and leasing	11,940	11,941	11,963	13,432	15,102	16,657	18,578	19,379	19,047	62.3%
Professional and technical services	13,885	13,756	13,854	14,720	15,172	16,018	17,022	17,385	16,810	25.2%
Management of companies and enterprises	943	1,014	778	896	917	1,027	1,031	966	929	2.4%
Administrative and waste services	11,522	11,668	11,843	11,437	11,262	11,940	13,098	12,873	12,191	11.7%
Educational services	2,382	2,595	2,628	2,796	2,945	3,143	2,998	3,186	3,323	33.8%
Health care and social assistance	22,917	23,264	24,207	24,958	25,322	25,973	27,005	27,973	28,900	22.1%
Arts, entertainment, and recreation	6,350	5,715	5,795	5,959	6,104	6,285	6,480	6,623	6,707	4.3%
Accommodation and food services	28,507	30,033	30,575	31,281	31,696	32,371	32,980	34,042	32,646	19.4%
Other services, except public administration	(D)	(D)	17,453	17,568	17,800	18,656	19,054	18,780	18,364	.
Government and government enterprises	65,274	66,119	67,154	67,636	68,494	68,502	70,206	71,508	73,916	9.6%
Total	330,878	333,771	336,901	344,343	355,201	371,472	390,073	401,501	392,431	21.3%

Table B.6
Real Earnings Per Job by Industry
 State of Wyoming
 BEA Data, 2009 Dollars

NAICS Categories	2001	2002	2003	2004	2005	2006	2007	2008	2009	% Change 01-09
Farm employment	18,629	9,087	17,466	17,256	22,231	9,556	2,474	6,914	3,738	-62.9%
Forestry, fishing, related activities, and other	21,882	21,096	23,236	22,422	20,357	20,570	19,586	18,206	18,124	-16.8%
Mining	84,301	84,485	85,246	89,235	89,476	97,321	91,409	102,018	91,802	21.0%
Utilities	(D)	(D)	104,460	104,753	102,395	109,495	103,409	106,224	109,241	.
Construction	47,202	(D)	48,230	47,450	47,351	50,601	52,096	53,924	50,186	14.2%
Manufacturing	55,438	(D)	56,123	55,353	55,011	57,959	58,831	62,661	64,816	13.0%
Wholesale trade	58,239	56,296	59,569	61,232	60,396	64,630	66,662	69,025	66,914	18.5%
Retail trade	25,570	25,405	25,946	26,261	26,184	27,614	27,891	27,506	27,254	7.6%
Transportation and warehousing	(D)	(D)	60,762	61,527	62,654	65,998	65,253	67,675	65,853	.
Information	(D)	(D)	40,411	42,131	39,251	41,777	43,505	44,401	44,664	.
Finance and insurance	42,773	40,249	39,970	39,877	39,091	42,482	36,646	31,670	27,333	-26.0%
Real estate and rental and leasing	31,921	35,375	32,098	32,661	29,625	25,747	18,009	16,830	15,945	-47.3%
Professional and technical services	43,911	45,444	42,940	43,251	44,452	46,357	47,767	51,072	50,540	16.3%
Management of companies and enterprises	54,006	71,439	101,326	96,079	95,217	100,231	95,508	97,877	94,667	81.2%
Administrative and waste services	25,450	23,332	24,381	23,976	23,743	24,862	25,612	26,807	25,276	5.3%
Educational services	18,678	22,288	20,527	21,276	19,904	20,131	21,772	21,698	21,949	16.2%
Health care and social assistance	40,149	41,934	42,249	43,491	42,917	43,789	44,921	47,667	47,755	18.7%
Arts, entertainment, and recreation	33,783	40,932	40,177	36,360	32,611	31,652	30,461	29,393	28,618	-13.0%
Accommodation and food services	18,022	18,490	18,876	19,705	20,244	23,412	23,014	21,653	21,423	20.1%
Other services, except public administration	(D)	(D)	27,852	27,625	28,710	30,678	33,906	32,518	32,282	.
Government and government enterprises	46,122	48,605	50,070	51,322	52,251	54,428	56,192	57,723	58,965	25.2%
Total	40,734	41,133	41,994	42,871	43,382	45,898	45,393	47,366	45,773	12.4%

Table B.7
Total Employment and Real Personal Income
 State of Wyoming
 BEA Data, 2010 Dollars

Year	1,000s of 2010 Dollars						Per Capita Income	Total Employment	Average Real Earnings Per Job
	Earnings	Social Security Contributions	Residents Adjustments	Dividends, Interest, Rents	Transfer Payments	Personal Income			
1969	4,653,106	317,294	62	892,906	424,729	5,653,510	17,183	157,954	29,456
1970	4,828,163	327,311	592	969,634	467,544	5,938,621	17,792	159,384	30,293
1971	5,077,724	352,045	-3,484	1,036,173	514,569	6,272,937	18,449	164,883	30,796
1972	5,571,396	397,484	-12,601	1,062,829	537,595	6,761,735	19,493	172,302	32,335
1973	6,255,112	503,658	-27,467	1,174,349	597,706	7,496,041	21,212	182,288	34,316
1974	6,801,403	573,908	-48,922	1,290,275	621,325	8,090,174	22,193	193,767	35,101
1975	7,047,450	599,374	-53,252	1,351,279	685,242	8,431,345	22,158	202,679	34,772
1976	7,493,121	664,314	-70,719	1,427,190	722,134	8,907,412	22,524	214,096	34,999
1977	8,364,778	731,314	-86,850	1,542,960	744,343	9,833,917	23,895	230,589	36,276
1978	9,505,598	845,640	-106,978	1,717,692	783,082	11,053,754	25,653	249,813	38,050
1979	10,387,859	963,295	-141,576	1,894,780	835,651	12,013,420	26,588	266,229	39,019
1980	10,988,829	1,023,636	-177,478	2,125,933	907,854	12,821,501	27,038	278,978	39,390
1981	11,279,996	1,156,041	-184,856	2,407,390	996,897	13,343,385	27,138	289,465	38,969
1982	10,780,248	1,137,007	-167,595	2,942,128	1,080,987	13,498,762	26,657	286,715	37,598
1983	9,831,365	1,003,558	-118,242	2,514,201	1,229,404	12,453,169	24,402	274,024	35,878
1984	9,840,287	1,037,377	-102,802	2,669,454	1,171,184	12,540,746	24,839	275,951	35,659
1985	9,966,551	1,076,664	-97,011	2,695,073	1,206,985	12,694,934	25,405	276,585	36,034
1986	9,633,655	1,021,513	-75,162	2,575,377	1,300,320	12,412,678	25,043	263,687	36,535
1987	8,863,474	939,753	-47,317	2,484,263	1,282,207	11,642,874	24,410	258,441	34,296
1988	8,640,685	988,620	-38,138	2,482,006	1,290,709	11,386,643	24,482	263,690	32,768
1989	8,904,492	987,679	-24,890	2,720,304	1,339,974	11,952,201	26,076	265,401	33,551
1990	9,261,841	1,057,632	-18,675	2,879,580	1,387,714	12,452,829	27,449	270,832	34,198
1991	9,297,106	1,091,355	-3,160	2,936,469	1,496,942	12,636,002	27,514	277,118	33,550
1992	9,602,935	1,113,218	-11,124	2,944,277	1,617,346	13,040,215	27,968	279,892	34,310
1993	9,982,178	1,143,814	-14,180	2,878,867	1,724,347	13,427,398	28,384	284,727	35,059
1994	10,116,378	1,186,858	-12,992	3,099,269	1,784,939	13,800,735	28,734	297,590	33,995
1995	10,162,718	1,194,876	-9,579	3,242,241	1,861,790	14,062,295	28,985	300,566	33,813
1996	10,273,699	1,197,640	-3,078	3,457,852	1,923,090	14,453,924	29,609	303,695	33,830
1997	10,792,980	1,223,334	3,879	3,714,991	1,939,299	15,227,813	31,112	306,690	35,191
1998	11,286,824	1,281,780	6,844	4,209,021	1,971,520	16,192,430	32,993	313,121	36,047
1999	11,935,445	1,325,397	5,254	4,412,836	2,025,536	17,053,674	34,678	316,462	37,715
2000	12,622,536	1,374,915	14,562	4,658,777	2,133,132	18,054,093	36,550	325,674	38,758
2001	13,477,885	1,440,246	9,407	4,550,370	2,251,310	18,848,725	(N)	330,878	40,734
2002	13,728,993	1,481,327	4,634	4,518,832	2,383,084	19,154,216	(N)	333,771	41,133
2003	14,147,824	1,521,806	1,451	4,780,352	2,504,048	19,911,869	(N)	336,901	41,994
2004	14,762,419	1,575,246	-335	5,092,915	2,575,898	20,855,651	(N)	344,343	42,871
2005	15,409,102	1,646,430	-708	5,706,114	2,628,659	22,096,736	(N)	355,201	43,382
2006	17,049,809	2,054,503	-6,688	6,863,501	2,701,035	24,553,154	(N)	371,472	45,898
2007	17,706,428	2,150,141	-9,294	6,862,447	2,803,030	25,212,470	(N)	390,073	45,393
2008	19,017,609	2,271,642	-20,067	7,764,457	3,032,169	27,522,526	(N)	401,501	47,366
2009	17,962,828	2,232,223	-11,178	7,429,820	3,388,998	26,538,246	(N)	392,431	45,773
2010	18,252,524	2,294,654	-10,923	7,461,814	3,561,193	26,969,954	47,851	(N)	(N)

APPENDIX C: ADDITIONAL HMDA DATA

The Home Mortgage Disclosure Act (HMDA) requires both depository and non-depository lenders to collect and publicly disclose information about housing-related loans and applications for such loans.²¹ Both types of lending institutions must meet a set of reporting criteria, as follows:

1. The institution must be a bank, credit union or savings association.
2. The total assets must exceed the coverage threshold.²²
3. The institution must have had a home or branch office in a metropolitan statistical area (MSA).
4. The institution must have originated at least one home purchase loan or refinancing of a home purchase loan secured by a first lien on a one- to four-family dwelling.
5. The institution must be federally insured or regulated.
6. The mortgage loan must have been insured, guaranteed or supplemented by a federal agency or intended for sale to Fannie Mae or Freddie Mac.

For other institutions, including non-depository institutions, the reporting criteria are as follows:

1. The institution must be a for-profit organization.
2. The institution's home purchase loan originations must equal or exceed 10.0 percent of the institution's total loan originations, or more than \$25 million.
3. The institution must have had a home or branch office in an MSA or have received applications for, originated or purchased five or more home purchase loans, home improvement loans, or refinancing mortgages on property located in an MSA in the preceding calendar year.
4. The institution must have assets exceeding \$10 million or have originated 100 or more home purchases in the preceding calendar year.

HMDA data represent most mortgage lending activity and are thus the most comprehensive collection of information regarding home purchase originations, home remodel loan originations and refinancing available.

The information presented in this section of the AI offers details pertaining to HMDA data as related to the State of Wyoming.

²¹ Data are considered "raw" because they contain entry errors and incomplete loan applications. Starting in 2004, the HMDA data made substantive changes in reporting. It modified the way it handled Hispanic data, loan interest rates, as well as the reporting of multifamily loan applications.

²² Each December the Federal Reserve announces the threshold for the following year. The asset threshold may change from year to year, based on changes in the Consumer Price Index for Urban Wage Earners and Clerical Workers.

Table C.1
Owner-Occupied Home Purchase Loan Applications by Action Taken

City of Casper
HMDA Data

Action	2004	2005	2006	2007	2008	2009	Total
Loan Originated	1,537	1,729	1,903	1,693	1,235	1,003	9,100
Application Approved But Not Accepted	121	181	142	139	85	44	712
Application Denied	223	306	265	277	195	71	1,337
Application Withdrawn By Applicant	104	160	161	145	90	57	717
File Closed for Incompleteness	18	14	13	33	3	3	84
Loan Purchased by the Institution	371	483	661	564	364	421	2,864
Preapproval Request Denied	0	2	0	0	0	0	2
Total	2,374	2,875	3,145	2,851	1,972	1,599	14,816
Denial Rate	12.7%	15.0%	12.2%	14.1%	13.6%	6.6%	12.8%

Table C.2
Owner-Occupied Home Purchase Loan Applications by Action Taken

City of Cheyenne
HMDA Data

Action	2004	2005	2006	2007	2008	2009	Total
Loan Originated	1,634	1,955	1,723	1,337	1,085	1,049	8,783
Application Approved But Not Accepted	98	142	147	64	43	23	517
Application Denied	223	289	175	115	102	53	957
Application Withdrawn By Applicant	182	190	144	128	106	92	842
File Closed for Incompleteness	24	19	25	18	6	8	100
Loan Purchased by the Institution	568	796	746	622	574	762	4,068
Preapproval Request Denied	0	0	1	0	0	0	1
Total	2,729	3,391	2,961	2,284	1,916	1,987	15,268
Denial Rate	12.0%	12.9%	9.2%	7.9%	8.6%	4.8%	9.8%

Table C.3
Owner-Occupied Home Purchase Loan Applications by Action Taken

Remainder of State
HMDA Data

Action	2004	2005	2006	2007	2008	2009	Total
Loan Originated	5,232	6,577	6,948	6,266	4,363	3,626	33,012
Application Approved But Not Accepted	677	687	819	749	329	238	3,499
Application Denied	1,474	1,758	1,867	1,705	1,055	695	8,554
Application Withdrawn By Applicant	688	952	761	527	386	296	3,610
File Closed for Incompleteness	152	172	155	131	85	55	750
Loan Purchased by the Institution	2,290	2,826	3,338	2,834	1,694	2,259	15,241
Preapproval Request Denied	0	7	1	1	0	2	11
Total	10,513	12,979	13,889	12,213	7,912	7,171	64,677
Denial Rate	22.0%	21.1%	21.2%	21.4%	19.5%	16.1%	20.6%

Table C.4					
Denial Rate for Owner Occupied Home Purchase Loan Applications by Gender					
City of Casper HMDA Data					
Year	Male	Female	Not Provided by Applicant	Not Applicable	Total
2004	11.9%	13.1%	40.0%	.	12.7%
2005	13.9%	17.2%	32.4%	.	15.0%
2006	12.0%	12.1%	20.9%	.	12.2%
2007	12.2%	19.6%	15.9%	.	14.1%
2008	13.1%	13.9%	23.5%	.	13.6%
2009	5.5%	9.9%	3.0%	.	6.6%
Total	11.9%	14.6%	21.7%	.	12.8%

Table C.5					
Denial Rate for Owner Occupied Home Purchase Loan Applications by Gender					
City of Cheyenne HMDA Data					
Year	Male	Female	Not Provided by Applicant	Not Applicable	Total
2004	10.0%	14.0%	47.8%	.	12.0%
2005	11.0%	15.2%	33.3%	0.0%	12.9%
2006	8.2%	9.4%	28.1%	.	9.2%
2007	7.1%	9.8%	12.5%	0.0%	7.9%
2008	7.6%	10.4%	16.0%	.	8.6%
2009	4.8%	4.4%	11.1%	.	4.8%
Total	8.6%	11.1%	28.1%	0.0%	9.8%

Table C.6					
Denial Rate for Owner Occupied Home Purchase Loan Applications by Gender					
Remainder of State HMDA Data					
Year	Male	Female	Not Provided by Applicant	Not Applicable	Total
2004	20.8%	24.3%	35.3%	0.0%	22.0%
2005	19.5%	25.3%	28.6%	40.0%	21.1%
2006	19.6%	24.2%	41.4%	0.0%	21.2%
2007	19.1%	26.6%	35.5%	0.0%	21.4%
2008	18.5%	22.8%	19.7%	0.0%	19.5%
2009	14.9%	19.0%	21.5%	0.0%	16.1%
Total	19.1%	24.1%	31.9%	9.5%	20.6%

Table C.7								
Owner-Occupied Home Purchase Loan Applications by Selected Action Taken by Gender								
State of Wyoming HMDA Data								
Gender		2004	2005	2006	2007	2008	2009	Total
Male	Originated	6,349	7,689	8,104	6,990	4,966	4,105	38,203
	Denied	1,340	1,601	1,641	1,375	950	548	7,455
	Denial Rate %	17.4%	17.2%	16.8%	16.4%	16.1%	11.8%	16.3%
Female	Originated	1,872	2,307	2,215	2,001	1,506	1,391	11,292
	Denied	470	639	519	589	350	233	2,800
	Denial Rate %	20.1%	21.7%	19.0%	22.7%	18.9%	14.3%	19.9%
Not Provided by Applicant	Originated	181	261	250	300	207	180	1,379
	Denied	110	111	147	133	52	38	591
	Denial Rate %	37.8%	29.8%	37.0%	30.7%	20.1%	17.4%	30.0%
Not Applicable	Originated	1	4	5	5	4	2	21
	Denied	0	2	0	0	0	0	2
	Denial Rate %	0.0%	33.3%	0.0%	0.0%	0.0%	0.0%	8.7%
Total	Originated	8,403	10,261	10,574	9,296	6,683	5,678	50,895
	Denied	1,920	2,353	2,307	2,097	1,352	819	10,848
	Denial Rate %	18.6%	18.7%	17.9%	18.4%	16.8%	12.6%	17.6%

Table C.8								
Owner-Occupied Home Purchase Loan Applications by Selected Action Taken by Gender								
City of Casper HMDA Data								
Gender		2004	2005	2006	2007	2008	2009	Total
Male	Originated	1,148	1,289	1,410	1,257	898	717	6,719
	Denied	155	208	193	174	135	42	907
	Denial Rate %	11.9%	13.9%	12.0%	12.2%	13.1%	5.5%	11.9%
Female	Originated	371	415	459	378	298	254	2,175
	Denied	56	86	63	92	48	28	373
	Denial Rate %	13.1%	17.2%	12.1%	19.6%	13.9%	9.9%	14.6%
Not Provided by Applicant	Originated	18	25	34	58	39	32	206
	Denied	12	12	9	11	12	1	57
	Denial Rate %	40.0%	32.4%	20.9%	15.9%	23.5%	3.0%	21.7%
Total	Originated	1,537	1,729	1,903	1,693	1,235	1,003	9,100
	Denied	223	306	265	277	195	71	1,337
	Denial Rate %	12.7%	15.0%	12.2%	14.1%	13.6%	6.6%	12.8%

Table C.9								
Owner-Occupied Home Purchase Loan Applications by Selected Action Taken by Gender								
City of Cheyenne HMDA Data								
Gender		2004	2005	2006	2007	2008	2009	Total
Male	Originated	1,186	1,357	1,196	949	761	697	6,146
	Denied	132	168	107	72	63	35	577
	Denial Rate %	10.0%	11.0%	8.2%	7.1%	7.6%	4.8%	8.6%
Female	Originated	424	553	481	359	303	328	2,448
	Denied	69	99	50	39	35	15	307
	Denial Rate %	14.0%	15.2%	9.4%	9.8%	10.4%	4.4%	11.1%
Not Provided by Applicant	Originated	24	44	46	28	21	24	187
	Denied	22	22	18	4	4	3	73
	Denial Rate %	47.8%	33.3%	28.1%	12.5%	16.0%	11.1%	28.1%
Not Applicable	Originated	0	1	0	1	0	0	2
	Denied	0
	Denial Rate %	.	0.0%	.	0.0%	.	.	0.0%
Total	Originated	1,634	1,955	1,723	1,337	1,085	1,049	8,783
	Denied	223	289	175	115	102	53	957
	Denial Rate %	12.0%	12.9%	9.2%	7.9%	8.6%	4.8%	9.8%

Table C.10								
Owner-Occupied Home Purchase Loan Applications by Selected Action Taken by Gender								
Remainder of State HMDA Data								
Gender		2004	2005	2006	2007	2008	2009	Total
Male	Originated	4,015	5,043	5,498	4,784	3,307	2,691	25,338
	Denied	1,053	1,225	1,341	1,129	752	471	5,971
	Denial Rate %	20.8%	19.5%	19.6%	19.1%	18.5%	14.9%	19.1%
Female	Originated	1,077	1,339	1,275	1,264	905	809	6,669
	Denied	345	454	406	458	267	190	2,120
	Denial Rate %	24.3%	25.3%	24.2%	26.6%	22.8%	19.0%	24.1%
Not Provided by Applicant	Originated	139	192	170	214	147	124	986
	Denied	76	77	120	118	36	34	461
	Denial Rate %	35.3%	28.6%	41.4%	35.5%	19.7%	21.5%	31.9%
Not Applicable	Originated	1	3	5	4	4	2	19
	Denied	0	2	0	0	0	0	2
	Denial Rate %	0.0%	40.0%	0.0%	0.0%	0.0%	0.0%	9.5%
Total	Originated	5,232	6,577	6,948	6,266	4,363	3,626	33,012
	Denied	1,474	1,758	1,867	1,705	1,055	695	8,554
	Denial Rate %	22.0%	21.1%	21.2%	21.4%	19.5%	16.1%	20.6%

Table C.11
Percent Denial Rates by Race/Ethnicity
 State of Wyoming
 HMDA Data

Race/Ethnicity	2004	2005	2006	2007	2008	2009	Total
City of Casper							
American Indian or Alaskan Native	0.0%	26.3%	0.0%	16.7%	14.3%	33.3%	17.4%
Asian	0.0%	24.0%	20.0%	5.9%	6.7%	0.0%	11.2%
Black	20.0%	53.3%	13.6%	25.0%	25.0%	0.0%	26.2%
White	11.5%	13.6%	11.9%	13.6%	13.3%	6.6%	12.1%
Not Applicable	35.2%	29.2%	17.6%	22.9%	22.2%	7.0%	23.8%
No Co-Applicant	33.3%	33.3%
Total	12.7%	15.0%	12.2%	14.1%	13.6%	6.6%	12.8%
Hispanic (Ethnicity)	17.9%	13.0%	11.1%	11.1%	20.9%	11.1%	14.1%
City of Cheyenne							
American Indian or Alaskan Native	12.5%	23.1%	0.0%	20.0%	25.0%	16.7%	17.8%
Asian	11.5%	11.5%	0.0%	9.1%	10.5%	0.0%	8.0%
Black	5.6%	27.8%	17.5%	18.2%	14.3%	0.0%	16.3%
White	10.7%	11.7%	8.5%	7.3%	7.8%	4.8%	9.0%
Not Applicable	34.3%	25.0%	17.7%	12.3%	20.7%	7.4%	20.7%
No Co-Applicant	20.0%	0.0%	.	0.0%	.	.	14.3%
Total	12.0%	12.9%	9.2%	7.9%	8.6%	4.8%	9.8%
Hispanic (Ethnicity)	14.0%	15.6%	13.8%	7.8%	9.2%	6.8%	11.9%
Remainder of State							
American Indian or Alaskan Native	36.2%	33.8%	44.4%	43.3%	43.2%	44.4%	40.5%
Asian	15.0%	27.9%	4.9%	29.1%	22.7%	17.9%	20.6%
Black	31.3%	23.7%	45.7%	35.3%	41.7%	11.1%	33.9%
White	20.4%	19.3%	19.5%	19.6%	18.9%	15.6%	19.1%
Not Applicable	39.5%	39.3%	40.4%	38.1%	25.2%	20.7%	36.3%
No Co-Applicant	30.8%	40.0%	0.0%	0.0%	0.0%	0.0%	18.8%
Total	22.0%	21.1%	21.2%	21.4%	19.5%	16.1%	20.6%
Hispanic (Ethnicity)	27.3%	32.4%	27.8%	30.2%	29.9%	20.7%	28.9%
State of Wyoming							
American Indian or Alaskan Native	31.4%	31.3%	39.6%	38.6%	38.2%	40.0%	36.1%
Asian	11.3%	23.5%	7.3%	23.4%	15.1%	9.3%	16.0%
Black	21.7%	30.3%	28.7%	27.9%	26.7%	3.6%	25.8%
White	17.1%	17.1%	16.6%	17.0%	16.3%	12.2%	16.3%
Not Applicable	38.1%	35.7%	33.7%	32.6%	24.0%	16.8%	32.2%
No Co-Applicant	28.6%	33.3%	0.0%	0.0%	0.0%	0.0%	19.0%
Total	18.6%	18.7%	17.9%	18.4%	16.8%	12.6%	17.6%
Hispanic (Ethnicity)	22.2%	25.9%	23.1%	23.9%	23.2%	15.4%	23.1%

Table C.12
Owner Occupied Home Purchase Loan Applications by Selected Action Taken by
Race/Ethnicity
 State of Wyoming
 HMDA Data

Race/Ethnicity		2004	2005	2006	2007	2008	2009	Total
American Indian or Alaskan Native	Originated	48	77	61	51	34	27	298
	Denied	22	35	40	32	21	18	168
	Denial Rate %	31.4%	31.3%	39.6%	38.6%	38.2%	40.0%	36.1%
Asian	Originated	71	91	89	82	79	49	461
	Denied	9	28	7	25	14	5	88
	Denial Rate %	11.3%	23.5%	7.3%	23.4%	15.1%	9.3%	16.0%
Black	Originated	47	62	77	49	22	27	284
	Denied	13	27	31	19	8	1	99
	Denial Rate %	21.7%	30.3%	28.7%	27.9%	26.7%	3.6%	25.8%
White	Originated	7,802	9,457	9,796	8,553	6,228	5,291	47,127
	Denied	1,611	1,944	1,951	1,752	1,209	738	9,205
	Denial Rate %	17.1%	17.1%	16.6%	17.0%	16.3%	12.2%	16.3%
Not Applicable	Originated	420	570	546	557	316	282	2,691
	Denied	259	317	278	269	100	57	1,280
	Denial Rate %	38.1%	35.7%	33.7%	32.6%	24.0%	16.8%	32.2%
No Co-Applicant	Originated	15	4	5	4	4	2	34
	Denied	6	2	0	0	0	0	8
	Denial Rate %	28.6%	33.3%	0.0%	0.0%	0.0%	0.0%	19.0%
Total	Originated	8,403	10,261	10,574	9,296	6,683	5,678	50,895
	Denied	1,920	2,353	2,307	2,097	1,352	819	10,848
	Denial Rate %	18.6%	18.7%	17.9%	18.4%	16.8%	12.6%	17.6%
Hispanic (Ethnicity)	Originated	343	432	445	418	278	203	2,119
	Denied	98	151	134	131	84	37	635
	Denial Rate %	22.2%	25.9%	23.1%	23.9%	23.2%	15.4%	23.1%

Table C.13
Owner Occupied Home Purchase Loan Applications by Selected Action Taken by
Race/Ethnicity

City of Casper
HMDA Data

Race/Ethnicity		2004	2005	2006	2007	2008	2009	Total
American Indian or Alaskan Native	Originated	4	14	7	5	6	2	38
	Denied	0	5	0	1	1	1	8
	Denial Rate %	0.0%	26.3%	0.0%	16.7%	14.3%	33.3%	17.4%
Asian	Originated	14	19	16	16	28	10	103
	Denied	0	6	4	1	2	0	13
	Denial Rate %	0.0%	24.0%	20.0%	5.9%	6.7%	0.0%	11.2%
Black	Originated	8	7	19	9	3	2	48
	Denied	2	8	3	3	1	0	17
	Denial Rate %	20.0%	53.3%	13.6%	25.0%	25.0%	0.0%	26.2%
White	Originated	1,450	1,609	1,763	1,582	1,142	949	8,495
	Denied	188	254	237	248	175	67	1,169
	Denial Rate %	11.5%	13.6%	11.9%	13.6%	13.3%	6.6%	12.1%
Not Applicable	Originated	59	80	98	81	56	40	414
	Denied	32	33	21	24	16	3	129
	Denial Rate %	35.2%	29.2%	17.6%	22.9%	22.2%	7.0%	23.8%
No Co-Applicant	Originated	2	0	0	0	0	0	2
	Denied	1	0	0	0	0	0	1
	Denial Rate %	33.3%	33.3%
Total	Originated	1,537	1,729	1,903	1,693	1,235	1,003	9,100
	Denied	223	306	265	277	195	71	1,337
	Denial Rate %	12.7%	15.0%	12.2%	14.1%	13.6%	6.6%	12.8%
Hispanic (Ethnicity)	Originated	46	60	48	56	34	24	268
	Denied	10	9	6	7	9	3	44
	Denial Rate %	17.9%	13.0%	11.1%	11.1%	20.9%	11.1%	14.1%

Table C.14
Owner Occupied Home Purchase Loan Applications by Selected Action Taken by
Race/Ethnicity
City of Cheyenne
HMDA Data

Race/Ethnicity		2004	2005	2006	2007	2008	2009	Total
American Indian or Alaskan Native	Originated	7	10	4	8	3	5	37
	Denied	1	3	0	2	1	1	8
	Denial Rate %	12.5%	23.1%	0.0%	20.0%	25.0%	16.7%	17.8%
Asian	Originated	23	23	15	10	17	16	104
	Denied	3	3	0	1	2	0	9
	Denial Rate %	11.5%	11.5%	0.0%	9.1%	10.5%	0.0%	8.0%
Black	Originated	17	26	33	18	12	17	123
	Denied	1	10	7	4	2	0	24
	Denial Rate %	5.6%	27.8%	17.5%	18.2%	14.3%	0.0%	16.3%
White	Originated	1,514	1,790	1,569	1,200	1,007	961	8,041
	Denied	181	238	146	94	85	48	792
	Denial Rate %	10.7%	11.7%	8.5%	7.3%	7.8%	4.8%	9.0%
Not Applicable	Originated	69	105	102	100	46	50	472
	Denied	36	35	22	14	12	4	123
	Denial Rate %	34.3%	25.0%	17.7%	12.3%	20.7%	7.4%	20.7%
No Co-Applicant	Originated	4	1	0	1	0	0	6
	Denied	1	0	0	0	0	0	1
	Denial Rate %	20.0%	0.0%	.	0.0%	.	.	14.3%
Total	Originated	1,634	1,955	1,723	1,337	1,085	1,049	8,783
	Denied	223	289	175	115	102	53	957
	Denial Rate %	12.0%	12.9%	9.2%	7.9%	8.6%	4.8%	9.8%
Hispanic (Ethnicity)	Originated	111	124	112	94	89	68	598
	Denied	18	23	18	8	9	5	81
	Denial Rate %	14.0%	15.6%	13.8%	7.8%	9.2%	6.8%	11.9%

Table C.15
Owner Occupied Home Purchase Loan Applications by Selected Action Taken by
Race/Ethnicity
Remainder of State
HMDA Data

Race/Ethnicity		2004	2005	2006	2007	2008	2009	Total
American Indian or Alaskan Native	Originated	37	53	50	38	25	20	223
	Denied	21	27	40	29	19	16	152
	Denial Rate %	36.2%	33.8%	44.4%	43.3%	43.2%	44.4%	40.5%
Asian	Originated	34	49	58	56	34	23	254
	Denied	6	19	3	23	10	5	66
	Denial Rate %	15.0%	27.9%	4.9%	29.1%	22.7%	17.9%	20.6%
Black	Originated	22	29	25	22	7	8	113
	Denied	10	9	21	12	5	1	58
	Denial Rate %	31.3%	23.7%	45.7%	35.3%	41.7%	11.1%	33.9%
White	Originated	4,838	6,058	6,464	5,771	4,079	3,381	30,591
	Denied	1,242	1,452	1,568	1,410	949	623	7,244
	Denial Rate %	20.4%	19.3%	19.5%	19.6%	18.9%	15.6%	19.1%
Not Applicable	Originated	292	385	346	376	214	192	1,805
	Denied	191	249	235	231	72	50	1,028
	Denial Rate %	39.5%	39.3%	40.4%	38.1%	25.2%	20.7%	36.3%
No Co-Applicant	Originated	9	3	5	3	4	2	26
	Denied	4	2	0	0	0	0	6
	Denial Rate %	30.8%	40.0%	0.0%	0.0%	0.0%	0.0%	18.8%
Total	Originated	5,232	6,577	6,948	6,266	4,363	3,626	33,012
	Denied	1,474	1,758	1,867	1,705	1,055	695	8,554
	Denial Rate %	22.0%	21.1%	21.2%	21.4%	19.5%	16.1%	20.6%
Hispanic (Ethnicity)	Originated	186	248	285	268	155	111	1,253
	Denied	70	119	110	116	66	29	510
	Denial Rate %	27.3%	32.4%	27.8%	30.2%	29.9%	20.7%	28.9%

Table C.16							
Owner-Occupied Home Purchase Loan Applications by Reason for Denial							
City of Casper HMDA Data							
Denial Reason	2004	2005	2006	2007	2008	2009	Total
Debt-to-income Ratio	26	22	26	46	34	9	163
Employment History	2	6	6	5	4	0	23
Credit History	40	70	59	59	54	24	306
Collateral	15	14	24	18	16	9	96
Insufficient Cash	4	3	8	6	6	2	29
Unverifiable Information	4	15	6	8	1	4	38
Credit Application Incomplete	13	21	13	29	18	2	96
Mortgage Insurance Denied	0	0	1	1	0	0	2
Other	60	102	66	27	6	5	266
Missing	59	53	56	78	56	16	318
Total	223	306	265	277	195	71	1,337

Table C.17							
Owner-Occupied Home Purchase Loan Applications by Reason for Denial							
City of Cheyenne HMDA Data							
Denial Reason	2004	2005	2006	2007	2008	2009	Total
Debt-to-income Ratio	21	33	23	19	25	5	126
Employment History	4	8	3	2	5	7	29
Credit History	62	58	54	27	17	15	233
Collateral	12	21	12	8	12	6	71
Insufficient Cash	13	4	6	1	3	4	31
Unverifiable Information	3	14	3	7	2	0	29
Credit Application Incomplete	21	18	13	4	3	1	60
Mortgage Insurance Denied	45	82	34	18	12	6	197
Other	42	51	27	29	23	9	181
Total	223	289	175	115	102	53	957

Table C.18							
Owner-Occupied Home Purchase Loan Applications by Reason for Denial							
Remainder of State HMDA Data							
Denial Reason	2004	2005	2006	2007	2008	2009	Total
Debt-to-income Ratio	146	136	155	154	140	105	836
Employment History	31	26	31	42	26	23	179
Credit History	310	421	393	470	253	162	2,009
Collateral	142	171	165	152	132	87	849
Insufficient Cash	42	22	14	31	25	20	154
Unverifiable Information	40	58	42	68	16	18	242
Credit Application Incomplete	88	107	130	113	52	28	518
Mortgage Insurance Denied	0	1	3	4	3	3	14
Other	198	320	271	130	63	59	1,041
Missing	477	496	663	541	345	190	2,712
Total	1,474	1,758	1,867	1,705	1,055	695	8,554

Table C.19
Owner-Occupied Home Purchase Loan Applications by Reason for Denial
 State of Wyoming
 HMDA Data, 2004 – 2009

Denial Reason	American Indian or Alaskan Native	Asian	Black	White	Not Applicable	No Co-Applicant	Total	Hispanic (Ethnicity)
Debt-to-income Ratio	13	8	9	992	102	1	1,125	71
Employment History	1	3	0	211	16	0	231	8
Credit History	50	21	24	2,188	264	1	2,548	202
Collateral	12	4	6	887	104	3	1,016	41
Insufficient Cash	0	2	1	181	29	1	214	8
Unverifiable Information	2	5	2	265	34	1	309	14
Credit Application Incomplete	4	5	6	576	83	0	674	24
Mortgage Insurance Denied	0	0	0	13	3	0	16	2
Other	17	13	24	1,259	191	0	1,504	92
Missing	69	27	27	2,633	454	1	3,211	173
Total	168	88	99	9,205	1,280	8	10,848	635
% Missing	41.1%	30.7%	27.3%	28.6%	35.5%	12.5%	29.6%	27.2%

Table C.20
Owner-Occupied Home Purchase Loan Applications by Reason for Denial
 City of Casper
 HMDA Data, 2004 – 2009

Denial Reason	American Indian or Alaskan Native	Asian	Black	White	Not Applicable	No Co-Applicant	Total	Hispanic (Ethnicity)
Debt-to-income Ratio	1	0	0	145	17	0	163	5
Employment History	1	1	0	21	0	0	23	0
Credit History	2	4	2	274	24	0	306	13
Collateral	0	2	1	86	7	0	96	2
Insufficient Cash	0	2	0	26	1	0	29	1
Unverifiable Information	0	0	0	31	7	0	38	0
Credit Application Incomplete	1	1	2	84	8	0	96	2
Mortgage Insurance Denied	0	0	0	1	1	0	2	0
Other	3	2	10	223	28	0	266	11
Missing	0	1	2	278	36	1	318	10
Total	8	13	17	1,169	129	1	1,337	44
% Missing	0.0%	7.7%	11.8%	23.8%	27.9%	100.0%	23.8%	22.7%

Table C.21
Owner-Occupied Home Purchase Loan Applications by Reason for Denial
City of Cheyenne
HMDA Data, 2004 – 2009

Denial Reason	American Indian or Alaskan Native	Asian	Black	White	Not Applicable	No Co-Applicant	Total	Hispanic (Ethnicity)
Debt-to-income Ratio	2	1	2	110	11	0	126	15
Employment History	0	0	0	25	4	0	29	3
Credit History	4	1	7	198	22	1	233	19
Collateral	2	0	1	56	12	0	71	4
Insufficient Cash	0	0	1	22	8	0	31	1
Unverifiable Information	0	2	1	24	2	0	29	2
Credit Application Incomplete	0	1	1	52	6	0	60	3
Other	0	1	8	165	23	0	197	18
Missing	0	3	3	140	35	0	181	16
Total	8	9	24	792	123	1	957	81
% Missing	0.0%	33.3%	12.5%	17.7%	28.5%	0.0%	18.9%	19.8%

Table C.22
Owner-Occupied Home Purchase Loan Applications by Reason for Denial
Remainder of State
HMDA Data, 2004 – 2009

Denial Reason	American Indian or Alaskan Native	Asian	Black	White	Not Applicable	No Co-Applicant	Total	Hispanic (Ethnicity)
Debt-to-income Ratio	10	7	7	737	74	1	836	51
Employment History	0	2	0	165	12	0	179	5
Credit History	44	16	15	1,716	218	0	2,009	170
Collateral	10	2	4	745	85	3	849	35
Insufficient Cash	0	0	0	133	20	1	154	6
Unverifiable Information	2	3	1	210	25	1	242	12
Credit Application Incomplete	3	3	3	440	69	0	518	19
Mortgage Insurance Denied	0	0	0	12	2	0	14	2
Other	14	10	6	871	140	0	1,041	63
Missing	69	23	22	2,215	383	0	2,712	147
Total	152	66	58	7,244	1,028	6	8,554	510
% Missing	45.4%	34.8%	37.9%	30.6%	37.3%	0.0%	31.7%	28.8%

Table C.23
Denial Rate by Income
 State of Wyoming
 HMDA Data

Income	2004	2005	2006	2007	2008	2009	Total
City of Casper							
\$15,000 or less	52.9%	71.4%	50.0%	55.6%	0.0%	100.0%	59.2%
More than \$15,000 up to \$30,000	19.0%	25.6%	21.0%	29.4%	37.5%	19.8%	24.3%
More than \$30,000 up to \$45,000	11.1%	14.3%	10.8%	15.4%	13.9%	6.6%	12.3%
More than \$45,000 up to \$60,000	11.8%	16.6%	12.6%	12.4%	11.3%	4.2%	12.2%
More than \$60,000 up to \$75,000	8.7%	10.9%	12.7%	14.1%	7.3%	6.5%	10.5%
More than \$75,000	7.0%	7.9%	9.7%	8.9%	11.8%	4.3%	8.6%
Data Missing	39.5%	3.7%	12.1%	9.4%	29.4%	18.2%	17.8%
Total	12.7%	15.0%	12.2%	14.1%	13.6%	6.6%	12.8%
City of Cheyenne							
\$15,000 or less	16.7%	77.8%	60.0%	80.0%	100.0%	0.0%	54.5%
More than \$15,000 up to \$30,000	22.9%	24.3%	20.7%	17.2%	25.5%	8.5%	20.9%
More than \$30,000 up to \$45,000	13.1%	12.1%	6.8%	8.3%	6.9%	5.1%	9.4%
More than \$45,000 up to \$60,000	10.0%	12.5%	6.2%	6.5%	5.5%	4.1%	8.1%
More than \$60,000 up to \$75,000	8.5%	11.0%	12.9%	8.6%	5.8%	3.5%	9.0%
More than \$75,000	6.6%	8.6%	7.9%	3.4%	8.2%	4.8%	6.8%
Data Missing	27.8%	14.0%	4.1%	21.1%	10.0%	0.0%	14.3%
Total	12.0%	12.9%	9.2%	7.9%	8.6%	4.8%	9.8%
Remainder of State							
\$15,000 or less	64.4%	53.7%	60.7%	78.7%	58.8%	60.9%	62.7%
More than \$15,000 up to \$30,000	32.3%	35.7%	35.7%	40.5%	42.6%	31.1%	35.8%
More than \$30,000 up to \$45,000	22.0%	22.6%	23.7%	22.9%	21.2%	18.9%	22.2%
More than \$45,000 up to \$60,000	18.8%	20.6%	19.7%	20.8%	17.2%	14.9%	19.1%
More than \$60,000 up to \$75,000	19.5%	16.1%	18.8%	17.5%	17.1%	14.0%	17.4%
More than \$75,000	16.7%	15.8%	18.2%	17.9%	16.9%	12.2%	16.7%
Data Missing	35.7%	22.6%	14.8%	22.1%	13.3%	27.5%	22.3%
Total	22.0%	21.1%	21.2%	21.4%	19.5%	16.1%	20.6%
State of Wyoming							
\$15,000 or less	59.4%	58.9%	59.7%	75.4%	60.5%	53.3%	61.5%
More than \$15,000 up to \$30,000	27.8%	31.6%	30.5%	34.6%	38.1%	24.0%	30.8%
More than \$30,000 up to \$45,000	18.3%	19.1%	18.3%	19.0%	17.2%	13.9%	18.0%
More than \$45,000 up to \$60,000	16.1%	18.5%	16.4%	17.4%	14.1%	11.3%	16.1%
More than \$60,000 up to \$75,000	15.9%	14.5%	17.1%	15.9%	14.2%	11.0%	15.1%
More than \$75,000	13.4%	13.5%	15.6%	15.0%	15.0%	9.9%	14.1%
Data Missing	35.1%	19.2%	12.9%	19.7%	16.7%	23.6%	20.4%
Total	18.6%	18.7%	17.9%	18.4%	16.8%	12.6%	17.6%

Table C.24
Owner-Occupied Home Purchase Loan Applications by Income: Originated and Denied
 State of Wyoming
 HMDA Data

Income		2004	2005	2006	2007	2008	2009	Total
\$15,000 or less	Loan Originated	39	37	27	15	15	14	147
	Application Denied	57	53	40	46	23	16	235
	Denial Rate %	59.4%	58.9%	59.7%	75.4%	60.5%	53.3%	61.5%
More than \$15,000 up to \$30,000	Loan Originated	1,070	943	737	573	323	357	4,003
	Application Denied	411	436	323	303	199	113	1,785
	Denial Rate %	27.8%	31.6%	30.5%	34.6%	38.1%	24.0%	30.8%
More than \$30,000 up to \$45,000	Loan Originated	2,160	2,409	2,068	1,805	1,294	1,169	10,905
	Application Denied	484	570	463	423	269	189	2,398
	Denial Rate %	18.3%	19.1%	18.3%	19.0%	17.2%	13.9%	18.0%
More than \$45,000 up to \$60,000	Loan Originated	1,991	2,581	2,501	2,210	1,649	1,423	12,355
	Application Denied	383	584	489	467	270	182	2,375
	Denial Rate %	16.1%	18.5%	16.4%	17.4%	14.1%	11.3%	16.1%
More than \$60,000 up to \$75,000	Loan Originated	1,213	1,563	1,616	1,452	1,117	896	7,857
	Application Denied	229	266	333	275	185	111	1,399
	Denial Rate %	15.9%	14.5%	17.1%	15.9%	14.2%	11.0%	15.1%
More than \$75,000	Loan Originated	1,780	2,492	3,302	3,102	2,225	1,777	14,678
	Application Denied	275	388	611	549	394	195	2,412
	Denial Rate %	13.4%	13.5%	15.6%	15.0%	15.0%	9.9%	14.1%
Data Missing	Loan Originated	150	236	323	139	60	42	950
	Application Denied	81	56	48	34	12	13	244
	Denial Rate %	35.1%	19.2%	12.9%	19.7%	16.7%	23.6%	20.4%
Total	Loan Originated	8,403	10,261	10,574	9,296	6,683	5,678	50,895
	Application Denied	1,920	2,353	2,307	2,097	1,352	819	10,848
	Denial Rate %	18.6%	18.7%	17.9%	18.4%	16.8%	12.6%	17.6%

Table C.25
Owner-Occupied Home Purchase Loan Applications by Income: Originated and Denied
 City of Casper
 HMDA Data

Income		2004	2005	2006	2007	2008	2009	Total
\$15,000 or less	Loan Originated	8	4	3	4	1	0	20
	Application Denied	9	10	3	5	0	2	29
	Denial Rate %	52.9%	71.4%	50.0%	55.6%	0.0%	100.0%	59.2%
More than \$15,000 up to \$30,000	Loan Originated	268	212	158	139	65	65	907
	Application Denied	63	73	42	58	39	16	291
	Denial Rate %	19.0%	25.6%	21.0%	29.4%	37.5%	19.8%	24.3%
More than \$30,000 up to \$45,000	Loan Originated	456	473	431	351	292	242	2,245
	Application Denied	57	79	52	64	47	17	316
	Denial Rate %	11.1%	14.3%	10.8%	15.4%	13.9%	6.6%	12.3%
More than \$45,000 up to \$60,000	Loan Originated	285	422	445	402	323	253	2,130
	Application Denied	38	84	64	57	41	11	295
	Denial Rate %	11.8%	16.6%	12.6%	12.4%	11.3%	4.2%	12.2%
More than \$60,000 up to \$75,000	Loan Originated	179	220	233	226	177	144	1,179
	Application Denied	17	27	34	37	14	10	139
	Denial Rate %	8.7%	10.9%	12.7%	14.1%	7.3%	6.5%	10.5%
More than \$75,000	Loan Originated	318	372	575	542	365	290	2,462
	Application Denied	24	32	62	53	49	13	233
	Denial Rate %	7.0%	7.9%	9.7%	8.9%	11.8%	4.3%	8.6%
Data Missing	Loan Originated	23	26	58	29	12	9	157
	Application Denied	15	1	8	3	5	2	34
	Denial Rate %	39.5%	3.7%	12.1%	9.4%	29.4%	18.2%	17.8%
Total	Loan Originated	1,537	1,729	1,903	1,693	1,235	1,003	9,100
	Application Denied	223	306	265	277	195	71	1,337
	Denial Rate %	12.7%	15.0%	12.2%	14.1%	13.6%	6.6%	12.8%

Table C.26
Owner-Occupied Home Purchase Loan Applications by Income: Originated and Denied
 City of Cheyenne
 HMDA Data

Income		2004	2005	2006	2007	2008	2009	Total
\$15,000 or less	Loan Originated	5	2	2	1	0	5	15
	Application Denied	1	7	3	4	3	0	18
	Denial Rate %	16.7%	77.8%	60.0%	80.0%	100.0%	0.0%	54.5%
More than \$15,000 up to \$30,000	Loan Originated	192	181	138	106	79	97	793
	Application Denied	57	58	36	22	27	9	209
	Denial Rate %	22.9%	24.3%	20.7%	17.2%	25.5%	8.5%	20.9%
More than \$30,000 up to \$45,000	Loan Originated	412	487	409	353	244	243	2,148
	Application Denied	62	67	30	32	18	13	222
	Denial Rate %	13.1%	12.1%	6.8%	8.3%	6.9%	5.1%	9.4%
More than \$45,000 up to \$60,000	Loan Originated	415	505	438	333	310	258	2,259
	Application Denied	46	72	29	23	18	11	199
	Denial Rate %	10.0%	12.5%	6.2%	6.5%	5.5%	4.1%	8.1%
More than \$60,000 up to \$75,000	Loan Originated	257	276	256	192	162	166	1,309
	Application Denied	24	34	38	18	10	6	130
	Denial Rate %	8.5%	11.0%	12.9%	8.6%	5.8%	3.5%	9.0%
More than \$75,000	Loan Originated	327	455	433	337	281	276	2,109
	Application Denied	23	43	37	12	25	14	154
	Denial Rate %	6.6%	8.6%	7.9%	3.4%	8.2%	4.8%	6.8%
Data Missing	Loan Originated	26	49	47	15	9	4	150
	Application Denied	10	8	2	4	1	0	25
	Denial Rate %	27.8%	14.0%	4.1%	21.1%	10.0%	0.0%	14.3%
Total	Loan Originated	1,634	1,955	1,723	1,337	1,085	1,049	8,783
	Application Denied	223	289	175	115	102	53	957
	Denial Rate %	12.0%	12.9%	9.2%	7.9%	8.6%	4.8%	9.8%

Table C.27
Owner-Occupied Home Purchase Loan Applications by Income: Originated and Denied
Remainder of State
HMDA Data

Income		2004	2005	2006	2007	2008	2009	Total
\$15,000 or less	Loan Originated	26	31	22	10	14	9	112
	Application Denied	47	36	34	37	20	14	188
	Denial Rate %	64.4%	53.7%	60.7%	78.7%	58.8%	60.9%	62.7%
More than \$15,000 up to \$30,000	Loan Originated	610	550	441	328	179	195	2,303
	Application Denied	291	305	245	223	133	88	1,285
	Denial Rate %	32.3%	35.7%	35.7%	40.5%	42.6%	31.1%	35.8%
More than \$30,000 up to \$45,000	Loan Originated	1,292	1,449	1,228	1,101	758	684	6,512
	Application Denied	365	424	381	327	204	159	1,860
	Denial Rate %	22.0%	22.6%	23.7%	22.9%	21.2%	18.9%	22.2%
More than \$45,000 up to \$60,000	Loan Originated	1,291	1,654	1,618	1,475	1,016	912	7,966
	Application Denied	299	428	396	387	211	160	1,881
	Denial Rate %	18.8%	20.6%	19.7%	20.8%	17.2%	14.9%	19.1%
More than \$60,000 up to \$75,000	Loan Originated	777	1,067	1,127	1,034	778	586	5,369
	Application Denied	188	205	261	220	161	95	1,130
	Denial Rate %	19.5%	16.1%	18.8%	17.5%	17.1%	14.0%	17.4%
More than \$75,000	Loan Originated	1,135	1,665	2,294	2,223	1,579	1,211	10,107
	Application Denied	228	313	512	484	320	168	2,025
	Denial Rate %	16.7%	15.8%	18.2%	17.9%	16.9%	12.2%	16.7%
Data Missing	Loan Originated	101	161	218	95	39	29	643
	Application Denied	56	47	38	27	6	11	185
	Denial Rate %	35.7%	22.6%	14.8%	22.1%	13.3%	27.5%	22.3%
Total	Loan Originated	5,232	6,577	6,948	6,266	4,363	3,626	33,012
	Application Denied	1,474	1,758	1,867	1,705	1,055	695	8,554
	Denial Rate %	22.0%	21.1%	21.2%	21.4%	19.5%	16.1%	20.6%

Table C.28
Percent Denial Rates of Owner-Occupied Home Purchase Loans by Race/Ethnicity by Income
 State of Wyoming
 HMDA Data

Race/Ethnicity	<= \$15K	\$15K - \$30K	\$30K - \$45K	\$45K - \$60K	\$60K - \$75K	Above \$75K	Data Missing	Total
City of Casper								
American Indian or Alaskan Native	100.0%	33.3%	30.8%	0.0%	0.0%	12.5%	.	17.4%
Asian	.	23.5%	3.8%	3.3%	18.8%	15.4%	0.0%	11.2%
Black	.	69.2%	15.4%	25.0%	11.1%	7.1%	.	26.2%
White	53.5%	22.8%	11.8%	11.7%	10.1%	8.0%	15.9%	12.1%
Not Applicable	100.0%	39.1%	21.9%	21.7%	16.7%	19.3%	42.9%	23.8%
No Co-Applicant	.	100.0%	0.0%	33.3%
Total	59.2%	24.3%	12.3%	12.2%	10.5%	8.6%	17.8%	12.8%
Hispanic (Ethnicity)	40.0%	27.7%	18.9%	10.7%	6.7%	1.9%	0.0%	14.1%
City of Cheyenne								
American Indian or Alaskan Native	.	66.7%	9.1%	0.0%	33.3%	0.0%	100.0%	17.8%
Asian	.	0.0%	3.8%	7.1%	5.6%	10.8%	50.0%	8.0%
Black	100.0%	18.2%	7.1%	18.6%	24.1%	8.8%	100.0%	16.3%
White	53.1%	19.2%	9.0%	7.4%	7.9%	6.0%	9.8%	9.0%
Not Applicable	.	41.5%	16.4%	15.6%	19.1%	20.2%	25.0%	20.7%
No Co-Applicant	.	.	100.0%	0.0%	.	0.0%	0.0%	14.3%
Total	54.5%	20.9%	9.4%	8.1%	9.0%	6.8%	14.3%	9.8%
Hispanic (Ethnicity)	25.0%	21.8%	9.1%	11.8%	14.5%	5.7%	0.0%	11.9%
Remainder of State								
American Indian or Alaskan Native	100.0%	73.5%	46.4%	30.4%	25.4%	36.1%	0.0%	40.5%
Asian	75.0%	14.3%	25.0%	17.8%	16.4%	20.0%	37.5%	20.6%
Black	.	75.0%	40.0%	22.0%	30.0%	31.0%	100.0%	33.9%
White	61.4%	33.6%	20.8%	17.7%	16.2%	15.6%	18.1%	19.1%
Not Applicable	70.4%	54.7%	36.9%	38.9%	31.9%	27.9%	45.3%	36.3%
No Co-Applicant	0.0%	50.0%	0.0%	33.3%	50.0%	25.0%	0.0%	18.8%
Total	62.7%	35.8%	22.2%	19.1%	17.4%	16.7%	22.3%	20.6%
Hispanic (Ethnicity)	84.6%	52.1%	26.5%	25.7%	23.6%	26.0%	21.4%	28.9%
State of Wyoming								
American Indian or Alaskan Native	100.0%	68.9%	40.7%	25.5%	23.3%	29.8%	20.0%	36.1%
Asian	75.0%	18.2%	14.8%	12.2%	14.6%	17.3%	36.4%	16.0%
Black	100.0%	55.6%	23.7%	21.1%	25.0%	18.9%	100.0%	25.8%
White	59.6%	28.8%	16.9%	15.0%	14.1%	13.1%	16.6%	16.3%
Not Applicable	75.0%	50.0%	31.3%	32.5%	27.9%	26.0%	41.0%	32.2%
No Co-Applicant	0.0%	66.7%	20.0%	20.0%	50.0%	20.0%	0.0%	19.0%
Total	61.5%	30.8%	18.0%	16.1%	15.1%	14.1%	20.4%	17.6%
Hispanic (Ethnicity)	63.6%	39.8%	20.8%	20.2%	20.3%	20.0%	17.6%	23.1%

Table C.29
Owner-Occupied Home Purchase Loan Applications by Income By Race/Ethnicity: Originated and Denied
 State of Wyoming
 HMDA Data, 2004 – 2009

Race/Ethnicity		<= \$15K	\$15K - \$30K	\$30K - \$45K	\$45K - \$60K	\$60K - \$75K	> \$75K	Data Missing	Total
American Indian or Alaskan Native	Loan Originated	0	19	64	82	56	73	4	298
	Application Denied	5	42	44	28	17	31	1	168
	Denial Rate %	100.0%	68.9%	40.7%	25.5%	23.3%	29.8%	20.0%	36.1%
Asian	Loan Originated	1	27	92	115	76	143	7	461
	Application Denied	3	6	16	16	13	30	4	88
	Denial Rate %	75.0%	18.2%	14.8%	12.2%	14.6%	17.3%	36.4%	16.0%
Black	Loan Originated	0	16	58	86	51	73	0	284
	Application Denied	1	20	18	23	17	17	3	99
	Denial Rate %	100.0%	55.6%	23.7%	21.1%	25.0%	18.9%	100.0%	25.8%
White	Loan Originated	137	3,742	10,120	11,489	7,254	13,565	820	47,127
	Application Denied	202	1,517	2,061	2,028	1,188	2,046	163	9,205
	Denial Rate %	59.6%	28.8%	16.9%	15.0%	14.1%	13.1%	16.6%	16.3%
Not Applicable	Loan Originated	8	198	567	579	418	816	105	2,691
	Application Denied	24	198	258	279	162	286	73	1,280
	Denial Rate %	75.0%	50.0%	31.3%	32.5%	27.9%	26.0%	41.0%	32.2%
No Co-Applicant	Loan Originated	1	1	4	4	2	8	14	34
	Application Denied	0	2	1	1	2	2	0	8
	Denial Rate %	0.0%	66.7%	20.0%	20.0%	50.0%	20.0%	0.0%	19.0%
Total	Loan Originated	147	4,003	10,905	12,355	7,857	14,678	950	50,895
	Application Denied	235	1,785	2,398	2,375	1,399	2,412	244	10,848
	Denial Rate %	61.5%	30.8%	18.0%	16.1%	15.1%	14.1%	20.4%	17.6%
Hispanic (Ethnicity)	Loan Originated	8	206	551	570	303	453	28	2,119
	Application Denied	14	136	145	144	77	113	6	635
	Denial Rate %	63.6%	39.8%	20.8%	20.2%	20.3%	20.0%	17.6%	23.1%

Table C.30
Owner-Occupied Home Purchase Loan Applications by Income By Race/Ethnicity: Originated and Denied

City of Casper
HMDA Data, 2004 – 2009

Race/Ethnicity		<= \$15K	\$15K - \$30K	\$30K - \$45K	\$45K - \$60K	\$60K - \$75K	> \$75K	Data Missing	Total
American Indian or Alaskan Native	Loan Originated	0	4	9	10	8	7	0	38
	Application Denied	1	2	4	0	0	1	0	8
	Denial Rate %	100.0%	33.3%	30.8%	0.0%	0.0%	12.5%	.	17.4%
Asian	Loan Originated	0	13	25	29	13	22	1	103
	Application Denied	0	4	1	1	3	4	0	13
	Denial Rate %	.	23.5%	3.8%	3.3%	18.8%	15.4%	0.0%	11.2%
Black	Loan Originated	0	4	11	12	8	13	0	48
	Application Denied	0	9	2	4	1	1	0	17
	Denial Rate %	.	69.2%	15.4%	25.0%	11.1%	7.1%	.	26.2%
White	Loan Originated	20	847	2,098	1,985	1,090	2,307	148	8,495
	Application Denied	23	250	281	264	123	200	28	1,169
	Denial Rate %	53.5%	22.8%	11.8%	11.7%	10.1%	8.0%	15.9%	12.1%
Not Applicable	Loan Originated	0	39	100	94	60	113	8	414
	Application Denied	5	25	28	26	12	27	6	129
	Denial Rate %	100.0%	39.1%	21.9%	21.7%	16.7%	19.3%	42.9%	23.8%
No Co-Applicant	Loan Originated	0	0	2	0	0	0	0	2
	Application Denied	0	1	0	0	0	0	0	1
	Denial Rate %	.	100.0%	0.0%	33.3%
Total	Loan Originated	20	907	2,245	2,130	1,179	2,462	157	9,100
	Application Denied	29	291	316	295	139	233	34	1,337
	Denial Rate %	59.2%	24.3%	12.3%	12.2%	10.5%	8.6%	17.8%	12.8%
Hispanic (Ethnicity)	Loan Originated	3	34	73	75	28	52	3	268
	Application Denied	2	13	17	9	2	1	0	44
	Denial Rate %	40.0%	27.7%	18.9%	10.7%	6.7%	1.9%	0.0%	14.1%

Table C.31
Owner-Occupied Home Purchase Loan Applications by Income By Race/Ethnicity: Originated and Denied

City of Cheyenne
HMDA Data, 2004 – 2009

Race/Ethnicity		<= \$15K	\$15K - \$30K	\$30K - \$45K	\$45K - \$60K	\$60K - \$75K	> \$75K	Data Missing	Total
American Indian or Alaskan Native	Loan Originated	0	2	10	8	4	13	0	37
	Application Denied	0	4	1	0	2	0	1	8
	Denial Rate %	.	66.7%	9.1%	0.0%	33.3%	0.0%	100.0%	17.8%
Asian	Loan Originated	0	2	25	26	17	33	1	104
	Application Denied	0	0	1	2	1	4	1	9
	Denial Rate %	.	0.0%	3.8%	7.1%	5.6%	10.8%	50.0%	8.0%
Black	Loan Originated	0	9	26	35	22	31	0	123
	Application Denied	1	2	2	8	7	3	1	24
	Denial Rate %	100.0%	18.2%	7.1%	18.6%	24.1%	8.8%	100.0%	16.3%
White	Loan Originated	15	742	1,975	2,064	1,190	1,935	120	8,041
	Application Denied	17	176	195	166	102	123	13	792
	Denial Rate %	53.1%	19.2%	9.0%	7.4%	7.9%	6.0%	9.8%	9.0%
Not Applicable	Loan Originated	0	38	112	124	76	95	27	472
	Application Denied	0	27	22	23	18	24	9	123
	Denial Rate %	.	41.5%	16.4%	15.6%	19.1%	20.2%	25.0%	20.7%
No Co-Applicant	Loan Originated	0	0	0	2	0	2	2	6
	Application Denied	0	0	1	0	0	0	0	1
	Denial Rate %	.	.	100.0%	0.0%	.	0.0%	0.0%	14.3%
Total	Loan Originated	15	793	2,148	2,259	1,309	2,109	150	8,783
	Application Denied	18	209	222	199	130	154	25	957
	Denial Rate %	54.5%	20.9%	9.4%	8.1%	9.0%	6.8%	14.3%	9.8%
Hispanic (Ethnicity)	Loan Originated	3	79	170	172	71	100	3	598
	Application Denied	1	22	17	23	12	6	0	81
	Denial Rate %	25.0%	21.8%	9.1%	11.8%	14.5%	5.7%	0.0%	11.9%

Table C.32
Owner-Occupied Home Purchase Loan Applications by Income By Race/Ethnicity: Originated and Denied

Remainder of State
HMDA Data, 2004 – 2009

Race/Ethnicity		<= \$15K	\$15K - \$30K	\$30K - \$45K	\$45K - \$60K	\$60K - \$75K	> \$75K	Data Missing	Total
American Indian or Alaskan Native	Loan Originated	0	13	45	64	44	53	4	223
	Application Denied	4	36	39	28	15	30	0	152
	Denial Rate %	100.0%	73.5%	46.4%	30.4%	25.4%	36.1%	0.0%	40.5%
Asian	Loan Originated	1	12	42	60	46	88	5	254
	Application Denied	3	2	14	13	9	22	3	66
	Denial Rate %	75.0%	14.3%	25.0%	17.8%	16.4%	20.0%	37.5%	20.6%
Black	Loan Originated	0	3	21	39	21	29	0	113
	Application Denied	0	9	14	11	9	13	2	58
	Denial Rate %	.	75.0%	40.0%	22.0%	30.0%	31.0%	100.0%	33.9%
White	Loan Originated	102	2,153	6,047	7,440	4,974	9,323	552	30,591
	Application Denied	162	1,091	1,585	1,598	963	1,723	122	7,244
	Denial Rate %	61.4%	33.6%	20.8%	17.7%	16.2%	15.6%	18.1%	19.1%
Not Applicable	Loan Originated	8	121	355	361	282	608	70	1,805
	Application Denied	19	146	208	230	132	235	58	1,028
	Denial Rate %	70.4%	54.7%	36.9%	38.9%	31.9%	27.9%	45.3%	36.3%
No Co-Applicant	Loan Originated	1	1	2	2	2	6	12	26
	Application Denied	0	1	0	1	2	2	0	6
	Denial Rate %	0.0%	50.0%	0.0%	33.3%	50.0%	25.0%	0.0%	18.8%
Total	Loan Originated	112	2,303	6,512	7,966	5,369	10,107	643	33,012
	Application Denied	188	1,285	1,860	1,881	1,130	2,025	185	8,554
	Denial Rate %	62.7%	35.8%	22.2%	19.1%	17.4%	16.7%	22.3%	20.6%
Hispanic (Ethnicity)	Loan Originated	2	93	308	323	204	301	22	1,253
	Application Denied	11	101	111	112	63	106	6	510
	Denial Rate %	84.6%	52.1%	26.5%	25.7%	23.6%	26.0%	21.4%	28.9%

Table C.33							
Originated Owner-Occupied Loans by Loan Purpose by Predatory Status							
State of Wyoming							
HMDA Data							
Loan Type	2004	2005	2006	2007	2008	2009	Total
City of Casper							
Other Originated	1,360	1,273	1,504	1,438	1,133	929	7,637
High APR Loan	177	456	399	255	102	74	1,463
Total	1,537	1,729	1,903	1,693	1,235	1,003	9,100
Percent High APR	11.5%	26.4%	21.0%	15.1%	8.3%	7.4%	16.1%
City of Cheyenne							
Other Originated	1,467	1,587	1,457	1,234	1,046	1,034	7,825
High APR Loan	167	368	266	103	39	15	958
Total	1,634	1,955	1,723	1,337	1,085	1,049	8,783
Percent High APR	10.2%	18.8%	15.4%	7.7%	3.6%	1.4%	10.9%
Remainder of State							
Other Originated	4,476	5,020	5,323	5,223	3,778	3,311	27,131
High APR Loan	756	1,557	1,625	1,043	585	315	5,881
Total	5,232	6,577	6,948	6,266	4,363	3,626	33,012
Percent High APR	14.4%	23.7%	23.4%	16.6%	13.4%	8.7%	17.8%
State of Wyoming							
Other Originated	7,303	7,880	8,284	7,895	5,957	5,274	42,593
High APR Loan	1,100	2,381	2,290	1,401	726	404	8,302
Total	8,403	10,261	10,574	9,296	6,683	5,678	50,895
Percent High APR	13.1%	23.2%	21.7%	15.1%	10.9%	7.1%	16.3%

Table C.34								
Originated Owner-Occupied Loans by Loan Purpose by Predatory Status								
State of Wyoming								
HMDA Data								
Loan Purpose		2004	2005	2006	2007	2008	2009	Total
Home Purchase	Other Originated	7,303	7,880	8,284	7,895	5,957	5,274	42,593
	High APR Loan	1,100	2,381	2,290	1,401	726	404	8,302
	Percent High APR	13.1%	23.2%	21.7%	15.1%	10.9%	7.1%	16.3%
Home Improvement	Other Originated	868	969	1,155	1,502	1,027	1,042	6,563
	High APR Loan	307	354	516	564	271	153	2,165
	Percent High APR	26.1%	26.8%	30.9%	27.3%	20.9%	12.8%	24.8%
Refinancing	Other Originated	7,122	6,019	5,185	5,888	6,238	11,503	41,955
	High APR Loan	1,868	2,373	2,403	1,827	1,161	554	10,186
	Percent High APR	20.8%	28.3%	31.7%	23.7%	15.7%	4.6%	19.5%
Total	Other Originated	15,293	14,868	14,624	15,285	13,222	17,819	91,111
	High APR Loan	3,275	5,108	5,209	3,792	2,158	1,111	20,653
	Percent High APR	17.6%	25.6%	26.3%	19.9%	14.0%	5.9%	18.5%

Table C.35
Originated Owner-Occupied Loans by Loan Purpose by Predatory Status
 City of Casper
 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	Total
Home Purchase	Other Originated	1,360	1,273	1,504	1,438	1,133	929	7,637
	High APR Loan	177	456	399	255	102	74	1,463
	Percent High APR	11.5%	26.4%	21.0%	15.1%	8.3%	7.4%	16.1%
Home Improvement	Other Originated	158	169	190	283	174	162	1,136
	High APR Loan	49	48	94	67	43	27	328
	Percent High APR	23.7%	22.1%	33.1%	19.1%	19.8%	14.3%	22.4%
Refinancing	Other Originated	982	801	672	791	890	1,629	5,765
	High APR Loan	303	350	341	297	139	62	1,492
	Percent High APR	23.6%	30.4%	33.7%	27.3%	13.5%	3.7%	20.6%
Total	Other Originated	2,500	2,243	2,366	2,512	2,197	2,720	14,538
	High APR Loan	529	854	834	619	284	163	3,283
	Percent High APR	17.5%	27.6%	26.1%	19.8%	11.4%	5.7%	18.4%

Table C.36
Originated Owner-Occupied Loans by Loan Purpose by Predatory Status
 City of Cheyenne
 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	Total
Home Purchase	Other Originated	1,467	1,587	1,457	1,234	1,046	1,034	7,825
	High APR Loan	167	368	266	103	39	15	958
	Percent High APR	10.2%	18.8%	15.4%	7.7%	3.6%	1.4%	10.9%
Home Improvement	Other Originated	105	127	129	151	117	116	745
	High APR Loan	28	51	61	51	15	14	220
	Percent High APR	21.1%	28.7%	32.1%	25.2%	11.4%	10.8%	22.8%
Refinancing	Other Originated	1,377	1,094	899	875	983	1,838	7,066
	High APR Loan	356	435	416	245	149	65	1,666
	Percent High APR	20.5%	28.4%	31.6%	21.9%	13.2%	3.4%	19.1%
Total	Other Originated	2,949	2,808	2,485	2,260	2,146	2,988	15,636
	High APR Loan	551	854	743	399	203	94	2,844
	Percent High APR	15.7%	23.3%	23.0%	15.0%	8.6%	3.0%	15.4%

Table C.37
Originated Owner-Occupied Loans by Loan Purpose by Predatory Status
 Remainder of State
 HMDA Data

Loan Purpose		2004	2005	2006	2007	2008	2009	Total
Home Purchase	Other Originated	4,476	5,020	5,323	5,223	3,778	3,311	27,131
	High APR Loan	756	1,557	1,625	1,043	585	315	5,881
	Percent High APR	14.4%	23.7%	23.4%	16.6%	13.4%	8.7%	17.8%
Home Improvement	Other Originated	605	673	836	1,068	736	764	4,682
	High APR Loan	230	255	361	446	213	112	1,617
	Percent High APR	27.5%	27.5%	30.2%	29.5%	22.4%	12.8%	25.7%
Refinancing	Other Originated	4,763	4,124	3,614	4,222	4,365	8,036	29,124
	High APR Loan	1,209	1,588	1,646	1,285	873	427	7,028
	Percent High APR	20.2%	27.8%	31.3%	23.3%	16.7%	5.0%	19.4%
Total	Other Originated	9,844	9,817	9,773	10,513	8,879	12,111	60,937
	High APR Loan	2,195	3,400	3,632	2,774	1,671	854	14,526
	Percent High APR	18.2%	25.7%	27.1%	20.9%	15.8%	6.6%	19.2%

Table C.38							
Percent of Predatory Owner-Occupied Home Purchase Loans Originated by Income							
State of Wyoming HMDA Data							
Income	2004	2005	2006	2007	2008	2009	Total
City of Casper							
<= \$15K	0.0%	0.0%	33.3%	0.0%	0.0%	.	5.0%
\$15K - \$30K	13.4%	23.6%	20.3%	18.0%	13.8%	4.6%	17.1%
\$30K - \$45K	13.4%	29.8%	20.0%	16.0%	7.5%	7.4%	17.1%
\$45K - \$60K	12.3%	31.5%	21.8%	14.4%	8.4%	4.7%	17.0%
\$60K - \$75K	11.2%	26.4%	25.8%	17.7%	6.2%	9.0%	17.1%
> \$75K	7.9%	19.6%	18.4%	12.7%	8.8%	9.3%	13.5%
Data Missing	0.0%	3.8%	29.3%	24.1%	8.3%	11.1%	17.2%
Total	11.5%	26.4%	21.0%	15.1%	8.3%	7.4%	16.1%
City of Cheyenne							
<= \$15K	20.0%	0.0%	50.0%	0.0%	#DIV/0!	0.0%	13.3%
\$15K - \$30K	14.1%	16.6%	15.9%	9.4%	6.3%	2.1%	12.1%
\$30K - \$45K	11.4%	19.7%	12.0%	5.4%	2.5%	1.6%	10.3%
\$45K - \$60K	8.4%	19.8%	15.5%	8.4%	4.5%	1.6%	11.0%
\$60K - \$75K	10.5%	27.5%	18.8%	6.8%	4.9%	1.2%	13.3%
> \$75K	8.9%	12.7%	14.3%	8.9%	1.8%	1.1%	8.9%
Data Missing	3.8%	16.3%	34.0%	20.0%	11.1%	0.0%	19.3%
Total	10.2%	18.8%	15.4%	7.7%	3.6%	1.4%	10.9%
Remainder of State							
<= \$15K	23.1%	22.6%	36.4%	40.0%	35.7%	33.3%	29.5%
\$15K - \$30K	20.5%	22.9%	27.7%	28.0%	17.3%	10.8%	22.4%
\$30K - \$45K	15.8%	24.0%	21.4%	16.5%	14.1%	7.7%	17.8%
\$45K - \$60K	14.5%	26.6%	23.9%	13.2%	13.0%	8.3%	17.8%
\$60K - \$75K	14.0%	26.9%	25.1%	17.2%	13.1%	7.5%	18.7%
> \$75K	10.2%	18.7%	22.0%	16.4%	13.0%	9.2%	16.0%
Data Missing	8.9%	23.0%	26.6%	28.4%	7.7%	20.7%	21.8%
Total	14.4%	23.7%	23.4%	16.6%	13.4%	8.7%	17.8%
State of Wyoming							
<= \$15K	17.9%	18.9%	37.0%	26.7%	33.3%	21.4%	24.5%
\$15K - \$30K	17.6%	21.8%	23.9%	22.2%	13.9%	7.3%	19.2%
\$30K - \$45K	14.4%	24.3%	19.2%	14.2%	10.4%	6.4%	16.2%
\$45K - \$60K	12.9%	26.1%	22.1%	12.7%	10.5%	6.5%	16.4%
\$60K - \$75K	12.9%	26.9%	24.2%	15.9%	10.8%	6.6%	17.6%
> \$75K	9.6%	17.8%	20.4%	15.0%	10.9%	8.0%	14.5%
Data Missing	6.7%	19.5%	28.2%	26.6%	8.3%	16.7%	20.6%
Total	13.1%	23.2%	21.7%	15.1%	10.9%	7.1%	16.3%

Table C.39
Originated Owner-Occupied Home Purchase Loans by Income by Predatory Status
 State of Wyoming
 HMDA Data

Income		2004	2005	2006	2007	2008	2009	Total
\$15,000 or less	Other Originated	32	30	17	11	10	11	111
	High APR Loan	7	7	10	4	5	3	36
	Percent High APR	17.9%	18.9%	37.0%	26.7%	33.3%	21.4%	24.5%
More than \$15,000 up to \$30,000	Other Originated	882	737	561	446	278	331	3,235
	High APR Loan	188	206	176	127	45	26	768
	Percent High APR	17.6%	21.8%	23.9%	22.2%	13.9%	7.3%	19.2%
More than \$30,000 up to \$45,000	Other Originated	1,848	1,824	1,670	1,548	1,159	1,094	9,143
	High APR Loan	312	585	398	257	135	75	1,762
	Percent High APR	14.4%	24.3%	19.2%	14.2%	10.4%	6.4%	16.2%
More than \$45,000 up to \$60,000	Other Originated	1,734	1,908	1,949	1,929	1,476	1,331	10,327
	High APR Loan	257	673	552	281	173	92	2,028
	Percent High APR	12.9%	26.1%	22.1%	12.7%	10.5%	6.5%	16.4%
More than \$60,000 up to \$75,000	Other Originated	1,057	1,142	1,225	1,221	996	837	6,478
	High APR Loan	156	421	391	231	121	59	1,379
	Percent High APR	12.9%	26.9%	24.2%	15.9%	10.8%	6.6%	17.6%
More than \$75,000	Other Originated	1,610	2,049	2,630	2,638	1,983	1,635	12,545
	High APR Loan	170	443	672	464	242	142	2,133
	Percent High APR	9.6%	17.8%	20.4%	15.0%	10.9%	8.0%	14.5%
Data Missing	Other Originated	140	190	232	102	55	35	754
	High APR Loan	10	46	91	37	5	7	196
	Percent High APR	6.7%	19.5%	28.2%	26.6%	8.3%	16.7%	20.6%
Total	Other Originated	7,303	7,880	8,284	7,895	5,957	5,274	42,593
	High APR Loan	1,100	2,381	2,290	1,401	726	404	8,302
	Percent High APR	13.1%	23.2%	21.7%	15.1%	10.9%	7.1%	16.3%

Table C.40
Originated Owner-Occupied Home Purchase Loans by Income by Predatory Status
 City of Casper
 HMDA Data

Income		2004	2005	2006	2007	2008	2009	Total
\$15,000 or less	Other Originated	8	4	2	4	1	0	19
	High APR Loan	0	0	1	0	0	0	1
	Percent High APR	0.0%	0.0%	33.3%	0.0%	0.0%	.	5.0%
More than \$15,000 up to \$30,000	Other Originated	232	162	126	114	56	62	752
	High APR Loan	36	50	32	25	9	3	155
	Percent High APR	13.4%	23.6%	20.3%	18.0%	13.8%	4.6%	17.1%
More than \$30,000 up to \$45,000	Other Originated	395	332	345	295	270	224	1,861
	High APR Loan	61	141	86	56	22	18	384
	Percent High APR	13.4%	29.8%	20.0%	16.0%	7.5%	7.4%	17.1%
More than \$45,000 up to \$60,000	Other Originated	250	289	348	344	296	241	1,768
	High APR Loan	35	133	97	58	27	12	362
	Percent High APR	12.3%	31.5%	21.8%	14.4%	8.4%	4.7%	17.0%
More than \$60,000 up to \$75,000	Other Originated	159	162	173	186	166	131	977
	High APR Loan	20	58	60	40	11	13	202
	Percent High APR	11.2%	26.4%	25.8%	17.7%	6.2%	9.0%	17.1%
More than \$75,000	Other Originated	293	299	469	473	333	263	2,130
	High APR Loan	25	73	106	69	32	27	332
	Percent High APR	7.9%	19.6%	18.4%	12.7%	8.8%	9.3%	13.5%
Data Missing	Other Originated	23	25	41	22	11	8	130
	High APR Loan	0	1	17	7	1	1	27
	Percent High APR	0.0%	3.8%	29.3%	24.1%	8.3%	11.1%	17.2%
Total	Other Originated	1,360	1,273	1,504	1,438	1,133	929	7,637
	High APR Loan	177	456	399	255	102	74	1,463
	Percent High APR	11.5%	26.4%	21.0%	15.1%	8.3%	7.4%	16.1%

Table C.41
Originated Owner-Occupied Home Purchase Loans by Income by Predatory Status
City of Cheyenne
HMDA Data

Income		2004	2005	2006	2007	2008	2009	Total
\$15,000 or less	Other Originated	4	2	1	1	0	5	13
	High APR Loan	1	0	1	0	0	0	2
	Percent High APR	20.0%	0.0%	50.0%	0.0%	#DIV/0!	0.0%	13.3%
More than \$15,000 up to \$30,000	Other Originated	165	151	116	96	74	95	697
	High APR Loan	27	30	22	10	5	2	96
	Percent High APR	14.1%	16.6%	15.9%	9.4%	6.3%	2.1%	12.1%
More than \$30,000 up to \$45,000	Other Originated	365	391	360	334	238	239	1,927
	High APR Loan	47	96	49	19	6	4	221
	Percent High APR	11.4%	19.7%	12.0%	5.4%	2.5%	1.6%	10.3%
More than \$45,000 up to \$60,000	Other Originated	380	405	370	305	296	254	2,010
	High APR Loan	35	100	68	28	14	4	249
	Percent High APR	8.4%	19.8%	15.5%	8.4%	4.5%	1.6%	11.0%
More than \$60,000 up to \$75,000	Other Originated	230	200	208	179	154	164	1,135
	High APR Loan	27	76	48	13	8	2	174
	Percent High APR	10.5%	27.5%	18.8%	6.8%	4.9%	1.2%	13.3%
More than \$75,000	Other Originated	298	397	371	307	276	273	1,922
	High APR Loan	29	58	62	30	5	3	187
	Percent High APR	8.9%	12.7%	14.3%	8.9%	1.8%	1.1%	8.9%
Data Missing	Other Originated	25	41	31	12	8	4	121
	High APR Loan	1	8	16	3	1	0	29
	Percent High APR	3.8%	16.3%	34.0%	20.0%	11.1%	0.0%	19.3%
Total	Other Originated	1,467	1,587	1,457	1,234	1,046	1,034	7,825
	High APR Loan	167	368	266	103	39	15	958
	Percent High APR	10.2%	18.8%	15.4%	7.7%	3.6%	1.4%	10.9%

Table C.42
Originated Owner-Occupied Home Purchase Loans by Income by Predatory Status
 Remainder of State
 HMDA Data

Income		2004	2005	2006	2007	2008	2009	Total
\$15,000 or less	Other Originated	20	24	14	6	9	6	79
	High APR Loan	6	7	8	4	5	3	33
	Percent High APR	23.1%	22.6%	36.4%	40.0%	35.7%	33.3%	29.5%
More than \$15,000 up to \$30,000	Other Originated	485	424	319	236	148	174	1,786
	High APR Loan	125	126	122	92	31	21	517
	Percent High APR	20.5%	22.9%	27.7%	28.0%	17.3%	10.8%	22.4%
More than \$30,000 up to \$45,000	Other Originated	1,088	1,101	965	919	651	631	5,355
	High APR Loan	204	348	263	182	107	53	1,157
	Percent High APR	15.8%	24.0%	21.4%	16.5%	14.1%	7.7%	17.8%
More than \$45,000 up to \$60,000	Other Originated	1,104	1,214	1,231	1,280	884	836	6,549
	High APR Loan	187	440	387	195	132	76	1,417
	Percent High APR	14.5%	26.6%	23.9%	13.2%	13.0%	8.3%	17.8%
More than \$60,000 up to \$75,000	Other Originated	668	780	844	856	676	542	4,366
	High APR Loan	109	287	283	178	102	44	1,003
	Percent High APR	14.0%	26.9%	25.1%	17.2%	13.1%	7.5%	18.7%
More than \$75,000	Other Originated	1,019	1,353	1,790	1,858	1,374	1,099	8,493
	High APR Loan	116	312	504	365	205	112	1,614
	Percent High APR	10.2%	18.7%	22.0%	16.4%	13.0%	9.2%	16.0%
Data Missing	Other Originated	92	124	160	68	36	23	503
	High APR Loan	9	37	58	27	3	6	140
	Percent High APR	8.9%	23.0%	26.6%	28.4%	7.7%	20.7%	21.8%
Total	Other Originated	4,476	5,020	5,323	5,223	3,778	3,311	27,131
	High APR Loan	756	1,557	1,625	1,043	585	315	5,881
	Percent High APR	14.4%	23.7%	23.4%	16.6%	13.4%	8.7%	17.8%

Table C.43							
Percent of Predatory Owner-Occupied Home Purchase Loans Originated by Race/Ethnicity							
State of Wyoming							
HMDA Data							
Race/Ethnicity	2004	2005	2006	2007	2008	2009	Total
City of Casper							
American Indian	0.0%	28.6%	28.6%	40.0%	33.3%	0.0%	26.3%
Asian	21.4%	42.1%	31.3%	12.5%	7.1%	0.0%	19.4%
Black or African American	25.0%	14.3%	26.3%	33.3%	0.0%	0.0%	22.9%
White	11.5%	25.2%	19.5%	15.0%	8.3%	7.5%	15.5%
Not Applicable	8.5%	46.3%	43.9%	13.6%	5.4%	7.5%	24.6%
No Co-Applicant	0.0%	0.0%
Total	11.5%	26.4%	21.0%	15.1%	8.3%	7.4%	16.1%
Hispanic (Ethnicity)	21.7%	35.0%	20.8%	25.0%	17.6%	16.7%	24.3%
City of Cheyenne							
American Indian	14.3%	10.0%	25.0%	12.5%	0.0%	20.0%	13.5%
Asian	4.3%	17.4%	26.7%	0.0%	11.8%	0.0%	10.6%
Black or African American	0.0%	38.5%	27.3%	5.6%	0.0%	0.0%	16.3%
White	10.0%	18.5%	14.1%	7.8%	3.7%	1.5%	10.6%
Not Applicable	18.8%	20.0%	30.4%	7.0%	0.0%	0.0%	15.3%
No Co-Applicant	0.0%	0.0%	.	0.0%	.	.	0.0%
Total	10.2%	18.8%	15.4%	7.7%	3.6%	1.4%	10.9%
Hispanic (Ethnicity)	10.8%	29.8%	29.5%	9.6%	4.5%	2.9%	16.2%
Remainder of State							
American Indian	13.5%	37.7%	16.0%	26.3%	28.0%	20.0%	24.2%
Asian	8.8%	24.5%	31.0%	19.6%	11.8%	4.3%	19.3%
Black or African American	36.4%	51.7%	28.0%	18.2%	0.0%	0.0%	30.1%
White	14.2%	22.9%	23.1%	16.5%	13.4%	8.8%	17.5%
Not Applicable	17.8%	32.2%	28.6%	17.8%	11.7%	6.3%	21.0%
No Co-Applicant	0.0%	33.3%	20.0%	0.0%	25.0%	0.0%	11.5%
Total	14.4%	23.7%	23.4%	16.6%	13.4%	8.7%	17.8%
Hispanic (Ethnicity)	23.7%	36.3%	36.5%	26.9%	18.1%	16.2%	28.4%
State of Wyoming							
American Indian	12.5%	32.5%	18.0%	25.5%	26.5%	18.5%	23.2%
Asian	9.9%	26.4%	30.3%	15.9%	10.1%	2.0%	17.4%
Black or African American	21.3%	41.9%	27.3%	16.3%	0.0%	0.0%	22.9%
White	12.9%	22.4%	21.0%	15.0%	10.9%	7.2%	16.0%
Not Applicable	16.7%	31.9%	31.7%	15.3%	8.9%	5.3%	20.5%
No Co-Applicant	0.0%	25.0%	20.0%	0.0%	25.0%	0.0%	8.8%
Total	13.1%	23.2%	21.7%	15.1%	10.9%	7.1%	16.3%
Hispanic (Ethnicity)	19.2%	34.3%	33.0%	22.7%	13.7%	11.8%	24.4%

Table C.44
Originated Owner-Occupied Home Purchase Loans by Race/Ethnicity by Predatory Status
 State of Wyoming
 HMDA Data

Race/Ethnicity	Loan Type	2004	2005	2006	2007	2008	2009	Total
American Indian	Other Originated	42	52	50	38	25	22	229
	High APR Loan	6	25	11	13	9	5	69
	Percent High APR	12.5%	32.5%	18.0%	25.5%	26.5%	18.5%	23.2%
Asian	Other Originated	64	67	62	69	71	48	381
	High APR Loan	7	24	27	13	8	1	80
	Percent High APR	9.9%	26.4%	30.3%	15.9%	10.1%	2.0%	17.4%
Black or African American	Other Originated	37	36	56	41	22	27	219
	High APR Loan	10	26	21	8	0	0	65
	Percent High APR	21.3%	41.9%	27.3%	16.3%	0.0%	0.0%	22.9%
White	Other Originated	6,795	7,334	7,739	7,271	5,548	4,908	39,595
	High APR Loan	1,007	2,123	2,057	1,282	680	383	7,532
	Percent High APR	12.9%	22.4%	21.0%	15.0%	10.9%	7.2%	16.0%
Not Applicable	Other Originated	350	388	373	472	288	267	2,138
	High APR Loan	70	182	173	85	28	15	553
	Percent High APR	16.7%	31.9%	31.7%	15.3%	8.9%	5.3%	20.5%
No Co-Applicant	Other Originated	15	3	4	4	3	2	31
	High APR Loan	0	1	1	0	1	0	3
	Percent High APR	0.0%	25.0%	20.0%	0.0%	25.0%	0.0%	8.8%
Total	Other Originated	7,303	7,880	8,284	7,895	5,957	5,274	42,593
	High APR Loan	1,100	2,381	2,290	1,401	726	404	8,302
	Percent High APR	13.1%	23.2%	21.7%	15.1%	10.9%	7.1%	16.3%
Hispanic (Ethnicity)	Other Originated	277	284	298	323	240	179	1,601
	High APR Loan	66	148	147	95	38	24	518
	Percent High APR	19.2%	34.3%	33.0%	22.7%	13.7%	11.8%	24.4%

Table C.45								
Originated Owner-Occupied Home Purchase Loans by Race/Ethnicity by Predatory Status								
City of Casper HMDA Data								
Race/Ethnicity	Loan Type	2004	2005	2006	2007	2008	2009	Total
American Indian	Other Originated	4	10	5	3	4	2	28
	High APR Loan	0	4	2	2	2	0	10
	Percent High APR	0.0%	28.6%	28.6%	40.0%	33.3%	0.0%	26.3%
Asian	Other Originated	11	11	11	14	26	10	83
	High APR Loan	3	8	5	2	2	0	20
	Percent High APR	21.4%	42.1%	31.3%	12.5%	7.1%	0.0%	19.4%
Black or African American	Other Originated	6	6	14	6	3	2	37
	High APR Loan	2	1	5	3	0	0	11
	Percent High APR	25.0%	14.3%	26.3%	33.3%	0.0%	0.0%	22.9%
White	Other Originated	1,283	1,203	1,419	1,345	1,047	878	7,175
	High APR Loan	167	406	344	237	95	71	1,320
	Percent High APR	11.5%	25.2%	19.5%	15.0%	8.3%	7.5%	15.5%
Not Applicable	Other Originated	54	43	55	70	53	37	312
	High APR Loan	5	37	43	11	3	3	102
	Percent High APR	8.5%	46.3%	43.9%	13.6%	5.4%	7.5%	24.6%
No Co-Applicant	Other Originated	2	0	0	0	0	0	2
	High APR Loan	0	0	0	0	0	0	0
	Percent High APR	0.0%	0.0%
Total	Other Originated	1,360	1,273	1,504	1,438	1,133	929	7,637
	High APR Loan	177	456	399	255	102	74	1,463
	Percent High APR	11.5%	26.4%	21.0%	15.1%	8.3%	7.4%	16.1%
Hispanic (Ethnicity)	Other Originated	36	39	38	42	28	20	203
	High APR Loan	10	21	10	14	6	4	65
	Percent High APR	21.7%	35.0%	20.8%	25.0%	17.6%	16.7%	24.3%

Table C.46
Originated Owner-Occupied Home Purchase Loans by Race/Ethnicity by Predatory Status
City of Cheyenne
HMDA Data

Race/Ethnicity	Loan Type	2004	2005	2006	2007	2008	2009	Total
American Indian	Other Originated	6	9	3	7	3	4	32
	High APR Loan	1	1	1	1	0	1	5
	Percent High APR	14.3%	10.0%	25.0%	12.5%	0.0%	20.0%	13.5%
Asian	Other Originated	22	19	11	10	15	16	93
	High APR Loan	1	4	4	0	2	0	11
	Percent High APR	4.3%	17.4%	26.7%	0.0%	11.8%	0.0%	10.6%
Black or African American	Other Originated	17	16	24	17	12	17	103
	High APR Loan	0	10	9	1	0	0	20
	Percent High APR	0.0%	38.5%	27.3%	5.6%	0.0%	0.0%	16.3%
White	Other Originated	1,362	1,458	1,348	1,106	970	947	7,191
	High APR Loan	152	332	221	94	37	14	850
	Percent High APR	10.0%	18.5%	14.1%	7.8%	3.7%	1.5%	10.6%
Not Applicable	Other Originated	56	84	71	93	46	50	400
	High APR Loan	13	21	31	7	0	0	72
	Percent High APR	18.8%	20.0%	30.4%	7.0%	0.0%	0.0%	15.3%
No Co-Applicant	Other Originated	4	1	0	1	0	0	6
	High APR Loan	0	0	0	0	0	0	0
	Percent High APR	0.0%	0.0%	.	0.0%	.	.	0.0%
Total	Other Originated	1,467	1,587	1,457	1,234	1,046	1,034	7,825
	High APR Loan	167	368	266	103	39	15	958
	Percent High APR	10.2%	18.8%	15.4%	7.7%	3.6%	1.4%	10.9%
Hispanic (Ethnicity)	Other Originated	99	87	79	85	85	66	501
	High APR Loan	12	37	33	9	4	2	97
	Percent High APR	10.8%	29.8%	29.5%	9.6%	4.5%	2.9%	16.2%

Table C.47
Originated Owner-Occupied Home Purchase Loans by Race/Ethnicity by Predatory Status
 Remainder of State
 HMDA Data

Race/Ethnicity	Loan Type	2004	2005	2006	2007	2008	2009	Total
American Indian	Other Originated	32	33	42	28	18	16	169
	High APR Loan	5	20	8	10	7	4	54
	Percent High APR	13.5%	37.7%	16.0%	26.3%	28.0%	20.0%	24.2%
Asian	Other Originated	31	37	40	45	30	22	205
	High APR Loan	3	12	18	11	4	1	49
	Percent High APR	8.8%	24.5%	31.0%	19.6%	11.8%	4.3%	19.3%
Black or African American	Other Originated	14	14	18	18	7	8	79
	High APR Loan	8	15	7	4	0	0	34
	Percent High APR	36.4%	51.7%	28.0%	18.2%	0.0%	0.0%	30.1%
White	Other Originated	4,150	4,673	4,972	4,820	3,531	3,083	25,229
	High APR Loan	688	1,385	1,492	951	548	298	5,362
	Percent High APR	14.2%	22.9%	23.1%	16.5%	13.4%	8.8%	17.5%
Not Applicable	Other Originated	240	261	247	309	189	180	1,426
	High APR Loan	52	124	99	67	25	12	379
	Percent High APR	17.8%	32.2%	28.6%	17.8%	11.7%	6.3%	21.0%
No Co-Applicant	Other Originated	9	2	4	3	3	2	23
	High APR Loan	0	1	1	0	1	0	3
	Percent High APR	0.0%	33.3%	20.0%	0.0%	25.0%	0.0%	11.5%
Total	Other Originated	4,476	5,020	5,323	5,223	3,778	3,311	27,131
	High APR Loan	756	1,557	1,625	1,043	585	315	5,881
	Percent High APR	14.4%	23.7%	23.4%	16.6%	13.4%	8.7%	17.8%
Hispanic (Ethnicity)	Other Originated	142	158	181	196	127	93	897
	High APR Loan	44	90	104	72	28	18	356
	Percent High APR	23.7%	36.3%	36.5%	26.9%	18.1%	16.2%	28.4%

APPENDIX D: ADDITIONAL COMPLAINT DATA

Table D.1 Fair Housing Complaints by Basis City of Casper HUD Data							
Basis	2005	2006	2007	2008	2009	2010	Total
Family Status	.	.	1	.	2	.	3
Disability – Physical	.	1	1	.	1	.	3
Religion	.	1	1	.	.	.	2
Disability – Mental	1	.	1	.	.	.	2
Hispanic	1	.	1	.	.	.	2
Retaliation	.	.	2	.	.	.	2
Sex – Male	.	1	1
Sex – Female	.	.	1	.	.	.	1
Black	.	.	.	1	.	.	1
Total Basis	2	3	8	1	3	.	17
Total Complaints	2	3	6	1	3	.	15

Table D.2 Fair Housing Complaints by Basis City of Cheyenne HUD Data							
Basis	2005	2006	2007	2008	2009	2010	Total
Disability – Physical	.	.	.	3	2	1	6
Disability – Mental	2	.	1	1	1	1	6
Black	1	1	2
Retaliation	.	.	.	1	1	.	2
Sex – Male	1	.	1
Sex – Female	.	1	1
Family Status	.	1	1
Total Basis	2	2	1	5	6	3	19
Total Complaints	2	2	1	5	3	2	15

Table D.3 Fair Housing Complaints by Basis Remainder of State HUD Data							
Basis	2005	2006	2007	2008	2009	2010	Total
Disability – Mental	1	2	5	4	3	.	15
Disability – Physical	2	1	1	5	1	3	13
Native American	9	1	1	.	.	.	11
Hispanic	2	.	1	.	2	1	6
Retaliation	.	.	2	1	1	.	4
Family Status	1	1	.	1	.	.	3
Sex – Female	1	1	2
Total Basis	16	5	10	11	7	5	54
Total Complaints	17	4	8	7	7	4	47

Table D.4							
Fair Housing Complaints by Issue							
City of Casper							
HUD Data							
Issue	2005	2006	2007	2008	2009	2010	Total
Discriminatory refusal to rent	2	.	1	1	2	.	6
Failure to make reasonable accommodation	1	1	1	.	1	.	4
Discriminatory terms, conditions, privileges, or services and facilities	1	.	1	1	.	.	3
Discrimination in terms/conditions/privileges relation to rental	.	.	2	.	1	.	3
Discriminatory refusal to rent and negotiate for rental	.	2	2
Discriminatory acts under Section 818 (coercion, etc.)	.	.	2	.	.	.	2
Discriminatory advertising, statements and notices	1	.	1
Total Issues	4	3	7	2	5	.	21
Total Complaints	2	3	6	1	3	.	15

Table D.5							
Fair Housing Complaints by Issue							
City of Cheyenne							
HUD Data							
Issue	2005	2006	2007	2008	2009	2010	Total
Otherwise deny or make housing available	1	.	1	4	2	1	9
Discriminatory acts under Section 818 (coercion, etc.)	2	1	.	2	.	.	5
Failure to make reasonable accommodation	1	1	.	.	.	1	3
Discriminatory refusal to sell and negotiate for sale	.	1	.	1	1	.	3
Discriminatory advertising, statements and notices	1	1
Steering	1	.	1
Failure to permit reasonable modification	1	.	1
False denial or representation of availability – Rental	1	.	1
Total Issues	5	3	1	7	6	2	24
Total Complaints	2	2	1	5	3	2	15

Table D.6							
Fair Housing Complaints by Issue							
Remainder of State							
HUD Data							
Issue	2005	2006	2007	2008	2009	2010	Total
Discriminatory refusal to rent	12	1	2	2	2	2	21
Discrimination in terms/conditions/privileges relation to rental	13	1	2	1	2	1	20
Failure to make reasonable accommodation	1	1	5	4	2	3	16
Discriminatory advertising, statements and notices	12	1	1	.	.	.	14
Discriminatory terms, conditions, privileges, or services and facilities	1	1	2	2	3	.	9
Steering	9	9
Discriminatory acts under Section 818 (coercion, etc.)	.	.	1	1	.	.	2
Discriminatory refusal to sell and negotiate for sale	.	.	1	.	.	.	1
False denial or representation of availability – Rental	.	1	1
Failure to permit reasonable modification	.	.	1	.	.	.	1
Total Issues	48	6	15	10	9	6	94
Total Complaints	17	4	8	7	7	4	47

Table D.7							
Fair Housing Complaints by Closure							
City of Casper							
HUD Data							
Closure Status	2005	2006	2007	2008	2009	2010	Total
No cause determination	.	1	2	1	1	.	5
Conciliation successful	1	1	.	.	2	.	4
Complainant failed to cooperate	.	1	2	.	.	.	3
Complaint withdrawn by complainant without resolution	1	1
Complaint withdrawn after resolution	.	.	1	.	.	.	1
Case still open	.	.	1	.	.	.	1
Total	2	3	6	1	3	.	15

Table D.8							
Fair Housing Complaints by Closure							
City of Cheyenne							
HUD Data							
Closure Status	2005	2006	2007	2008	2009	2010	Total
Conciliation successful	.	1	1	3	1	.	6
Complainant failed to cooperate	1	1	.	1	.	1	4
No cause determination	.	.	.	1	2	.	3
Complaint withdrawn after resolution	1	1
Case still open	1	1
Total	2	2	1	5	3	2	15

Table D.9							
Fair Housing Complaints by Closure							
Remainder of State							
HUD Data							
Closure Status	2005	2006	2007	2008	2009	2010	Total
No cause determination	5	3	5	4	4	2	23
Complainant failed to cooperate	11	.	1	1	.	.	13
Conciliation successful	1	1	2	2	1	.	7
Complaint withdrawn after resolution	2	2	4
Total	17	4	8	7	7	4	47

Table D.10							
Successfully Conciliated Fair Housing Complaints by Basis							
City of Casper HUD Data							
Basis	2005	2006	2007	2008	2009	2010	Total
Religion	.	1	1
Family Status	2	.	2
Hispanic	1	1
Total Basis	1	1	.	.	2	.	4
Total Complaints	1	1	.	.	1	.	3

Table D.11							
Successfully Conciliated Fair Housing Complaints by Basis							
City of Cheyenne HUD Data							
Basis	2005	2006	2007	2008	2009	2010	Total
Family Status	.	1	1
Disability – Physical	.	.	.	2	1	.	3
Disability – Mental	.	.	1	.	1	.	2
Retaliation	.	.	.	1	.	.	1
Total Basis	.	1	1	3	2	.	7
Total Complaints	.	1	1	3	1	.	6

Table D.12							
Successfully Conciliated Fair Housing Complaints by Basis							
Remainder of State HUD Data							
Basis	2005	2006	2007	2008	2009	2010	Total
Disability – Physical	1	1	.	2	.	.	4
Disability – Mental	.	1	2	1	1	.	5
Total Basis	1	2	2	3	1	.	9
Total Complaints	1	1	2	2	1	.	7

Table D.13							
Successfully Conciliated Fair Housing Complaints by Issue							
City of Casper HUD Data							
Issue	2005	2006	2007	2008	2009	2010	Total
Discriminatory refusal to rent	1	.	.	.	2	.	3
Discriminatory refusal to rent and negotiate for rental	.	1	1
Discriminatory advertising, statements and notices	1	.	1
Discriminatory terms, conditions, privileges, or services and facilities	1	1
Total Issues	2	1	.	.	3	.	6
Total Complaints	1	1	.	.	1	.	3

Table D.14							
Successfully Conciliated Fair Housing Complaints by Issue							
City of Cheyenne HUD Data							
Issue	2005	2006	2007	2008	2009	2010	Total
Discriminatory refusal to rent	.	1	1
Discrimination in terms/conditions/privileges relation to rental	.	.	1	.	.	.	1
Discriminatory acts under Section 818 (coercion, etc.)	.	.	1	.	.	.	1
Failure to permit reasonable modification	1	.	1
Failure to make reasonable accommodation	.	.	1	2	1	.	4
Total Issues	.	1	3	2	2	.	8
Total Complaints	.	1	1	3	1	.	6

Table D.15							
Successfully Conciliated Fair Housing Complaints by Issue							
Remainder of State HUD Data							
Issue	2005	2006	2007	2008	2009	2010	Total
Failure to make reasonable accommodation	.	.	2	2	.	.	4
Discriminatory refusal to rent	.	1	.	.	1	.	2
Discrimination in terms/conditions/privileges relation to rental	.	.	1	.	1	.	2
Discriminatory advertising, statements and notices	.	1	1
Discriminatory terms, conditions, privileges, or services and facilities	1	1
Total Issues	1	2	3	2	2	.	10
Total Complaints	1	1	2	2	1	.	7

APPENDIX E: ADDITIONAL PUBLIC INVOLVEMENT DATA

FAIR HOUSING FORUM DISCUSSION – APRIL 5, 2011

Can you look at historic motives as to why there may be high concentrations of minorities in some areas? For example, I'm from the Big Horn Basin and we are farmers and use many migrant workers. If you wanted to know why there are many Hispanics in this area, it's because they moved here for work. Can they look at that?

Well, if it is historical in context, there would have been a large Hispanic population in 2000. If the migrant workers decided to stay and changed the population, then we would need to address that.

They do stay. The work is consistent. There may actually be a decrease recently, from better farming technology and methods. We do not need as many migrant workers.

What I'm suggesting is HUD will look at settlement patterns and question them. In a way, I'm trying to give you guys a little scare because I've seen HUD point to a study that said a population settled because of realtor steering. Mostly, I'm trying to caution you about the elevated scrutiny.

Are you saying that 23.0 percent of all Hispanics that apply are turned down?

Yes, that is exactly what I am saying.

Does it give us the reason why they are turned down?

Yes, there are a few reasons why they could be turned down, most frequent is credit history. "Other" is reported frequently, "missing" is frequent and then "employment history."

Is the difference in 2009 disproportionate from previous years?

Yes, for Casper and Cheyenne.

Could that be part of our population issue? If you have one person is denied but only ten applications were submitted, that equates to ten percent. Casper and Cheyenne have larger population, with bigger denominators. In our smaller communities, one or two denials could really skew the percentage.

I believe it is significant enough that there may be something else going on, maybe something with the lending institutions.

Maybe it's because there are more lending institutions in the bigger areas. In bigger communities if a lending institution turns you down, you can try at a different one. In smaller communities, there is usually only one lending institution. If it turns you down you are done.

Is this HMDA data reported by the location of the financial institutions or the location of the home?

It is by the census tract in which the home is located.

Did you say the minority populations are substantially lower in Cheyenne and Casper than in other parts of the state?

No, the denial rates are lower for minorities in Casper and Cheyenne. I am trying to highlight that the lending industry in Casper and Cheyenne is a little different from the rest of the state.

What were the Cheyenne numbers?

7.4 percent of the loans made in Cheyenne were HALS.

Would subgroups be included, like the suburbs of Casper?

If they are in the same census tract, the answer is yes they would be included in the data.

Well, we've had some really big subdivision go up in the last couple of years. There was a lot of RD financing, with no money down and great rates.

When I moved back to this state, I had a housing complaint and they said there was no place to report it.

Who is "they"?

Well, I took it to my realtor and they said there was nothing I could do-there is nowhere to file a formal complaint in Wyoming. That was in 2007.

Are these legitimate complaints?

This is before HUD reviews the complaints.

What is the "no cause determination"?

The no cause determination is an outcome from investigated complaints.

When we receive the final document, will it contain a copy of the survey responses?

We summarize the results and put them in the document.

I've worked with many indigenous groups over the years. They are frequently denied because they do not have any credit or poor credit because they do not understand it.

I believe there are historical perspectives that affect them. My question is how we can fix that?

We are currently working on a specialized loan program for people who have no credit. We are working with lenders who are willing to take that risk and set up a program with private lenders.

My guess is that the Native Americans do not realize all of the trust land issues. If they try to get a loan on trust lands, they are denied because you can only own the building, not the land.

We are also working on converting 1050 acres from trust land as a development on the reservation. Part of the trust land would be expanded and then natives could actually own their land on the new development. It is a major issue. The Native Americans cannot own their land right now but we are trying to fix that.

Do you think that has to do with the high denial rates? There is no way of making that loan secure on the reservation.

We do not have enough convenient credit counselors in Wyoming. We refer people to someone in the northern part of the state and then to Montana. I'm not sure people even bother to call the people in Montana because it isn't convenient. They think if they just wait it out they'll get a loan eventually. I truly believe many of the denials, especially among minorities, is due to credit.

We have one resource here, the Northern Colorado/Eastern Wyoming Credit Counseling Service. The point I would make is: from the private sector, we are working with 31 families in our homeownership program. Our strategy is recognizing that their income is typically lower. We spend two years preparing them for homeownership. There are 15 faith-based organizations and 25 businesses that participate in creating a community partner gift to these families. . The families save \$2400 and at the end of the program, we provide \$1600. The two-year strategy of education and savings gets them in the door of a modest home.

Table E.1 Survey Contact List Wyoming Fair Housing Survey		
City/Town	Name	Contact Email
Town of Afton	Loni Hillyard	lhokan@silverstar.com or hwarren@silverstar.com
Town of Albin	Kelly Krakow	albincomcenter@aol.com
Town of Alpine	Kennis Lutz	alpine@silverstar.com
Town of Baggs	Kathy Staman	tbags@dteworld.com
Town of Bairoil	Marshall D. Reaser	townofb@wbaccess.net
Town of Bar Nunn	Jerry Petty	townofbarnunn@bresnan.net
Town of Basin	Amy Kania	townofbasin@tctwest.net
Town of Bear River	Robin Rhodes	bearriver@nglconnection.net
Town of Big Piney	Phillip Smith	tbpiney@yahoo.com
Town of Buffalo	Stan Lakin	cityhall@vcn.com
Town of Burlington	Robert Aagard	Burlington@tctwest.net
Town of Burns	Phil Oakes	burnswy@hotmail.com
Town of Byron	Bret George	byronwy@tctwest.net
City of Casper	Paul Bertoglio	dgoehring@cityofcasper.com
City of Cheyenne	Rick Kaysen	mayor@cheyennecity.com
Town of Chugwater	Carol Ash	townofchugwater@yahoo.com
Town of Clearmont	Dana Gorzalka	townhall@rangeweb.net
City of Cody	Nancy Tia Brown	codycity@cityofcody.com
Town of Cokeville	Stanley Thompson, Jr.	tocclerk@allwest.net
Town of Cowley	Joel Peterson	cowleytown@tctwest.net
Town of Dayton	Bob Wood	beltower@fiberpipe.net
Town of Deaver	Fred Yates	deavertown@tctwest.net
Town of Diamondville	Eric Backman	diamondvilletown@yahoo.com
Town of Dixon	Matt Feldmann	dixonclerk@dteworld.com
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Town of Dubois	Twila Blakeman	Dubois@wyoming.com
Town of East Thermopolis	Reba N. Odde	eastthermop@rtconnect.net
Town of Edgerton	H.H. "Buck" King	townofe@rtconnect.net
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City of Evanston	Joy Bell	evanston@evanstonwy.org
Town of Evansville	Phil Hines	town_evansville@bresnan.net
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Town of Frannie	John Cordner	frannietaown@tctwest.net
City of Gillette	Tom Murphy	gillette@ci.gillette.wy.us
Town of Glendo	Susan Juschka	glendotownof@yahoo.com
Town of Glenrock	Michael McQueary	glenrocktown@aol.com
Town of Granger	Lenore Perry	tog@bvea.net
City of Green River	Hank Castillon	admininfo@cityofgreenriver.org
Town of Greybull	Frank Houk	clerktreasurer@rtconnect.net
Town of Guernsey	Edward Delgado	info@townofguernseywy.us
Town of Hanna	Tony Poulos	townofhanna1@union-tel.com
Town of Hartville	Darrell Offee	hartville@vistabeam.com
Town of Hudson	Jake Hamon	tohudson@qwestoffice.net
Town of Hulett	Shawn Tabke	toh@rtconnect.net

Town of Jackson	Mark Barron	electedofficials@townofjackson.com
Town of Kaycee	Tom Knapp	townofkc@rtconnect.net
City of Kemmerer	Zem Hopkins	cityhall@kemmerer.org
Town of Kirby	Don Larson	kirbywy@yahoo.com
Town of LaBarge	Larry Stepp	lab@union-tel.com
Townof LaGrange	Mark Marshall	lagrange@lagrangewyo.com
City of Lander	Mick Wolfe	landercity@wyoming.com
City of Laramie	To Be Appointed	
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Town of Van Tassell	William Matthews	N/A
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Town of Wheatland	Jean Dixon	ckahler@netcommander.com
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Worland	Ron Vanderpool	permittech@rtconnect.net
Write	Lyle Murdock	buildingofficial@writewyoming.com

ANNOUNCEMENT OF FINAL PRESENTATION

NEWS RELEASE - Business Council seeks public comment on housing analysis document

For release: June 14, 2011

For more information:

Kim Sears, Marketing and Public Relations

Wyoming Business Council

Office: 307.777.2834

Email: kim.sears@wybusiness.org

CASPER – The Wyoming Business Council is seeking public comment on an analysis of housing transactions in Wyoming and the state’s housing delivery system.

Wyoming receives federal funding from the U.S. Department of Housing and Urban Development (HUD) in the form of HOME funds administered by the Wyoming Community Development Authority and Community Development Block Grant (CDBG) funds administered by the Wyoming Business Council. Both funding sources may be used for housing-related projects in Wyoming.

The State is required by HUD to compile an Analysis of Impediments to Fair Housing Choice. The document examines housing in Wyoming, the housing delivery system, and housing transactions with particular attention to groups protected by law (race, religion, sex, disability, familial status or nation origin) to discern if their housing choices or the availability of housing was restricted in any way.

The last analysis document in Wyoming was completed in 2007.

A presentation on the Analysis of Impediments will be made during a 2012 Action Plan public hearing to be held via compressed video on June 22 from 10:30 a.m. – 12:30 p.m. in the following locations:

- Basin Retirement Center, 890 Hwy 20 South, Basin, WY
- Casper Workforce Center, 851 Werner Court, Suite 121, Casper, WY
- Cheyenne State Library, Room 106, 2800 Central Ave., Cheyenne, WY
- Cody Workforce Center, 1026 Blackburn, Cody, WY
- Douglas Workforce Center, 311 N. Russell Ave, Douglas, WY
- Evanston Employment Services, 98 Independence, Evanston, WY
- Gillette Workforce Center, 1901 Energy Court, Suite 230, Gillette, WY
- Jackson Workforce Center, 155 West Gill, Jackson, WY
- Kemmerer Workforce Center, 136 Burgoon Drive, Diamondville, WY
- Lander State Training School, 100 Meadow View Drive, Lander, WY
- Laramie Workforce Center, 112 South 5th St., Laramie, WY
- Rawlins Employment Services Office, 1703 Edinburgh, Rawlins, WY
- Riverton Workforce Center, 422 E. Fremont, Riverton, WY
- Rock Springs Workforce Center, 2441 Foothill Blvd., Rock Springs, WY

- Sheridan Workforce Center, 61 South Gould, Sheridan, WY
- Torrington Workforce Center, 1610 - 18 East M. St., Torrington, WY

Interested persons may view the document online at: www.wyomingcda.com or www.wyomingbusiness.org/program/cdbg-public-information/3290.

A limited number of hard copies may be obtained by contacting Julie Kozlowski at (307) 777-2812. Anyone with limited English proficiency or other disabilities that require assistance to obtain or understand this document should also contact Kozlowski.

The mission of the Business Council is to facilitate the economic growth of Wyoming. The Business Council, a state government agency, concentrates its efforts on providing assistance for existing Wyoming companies and start-ups, helping communities meet their development and diversification needs, and recruiting new firms and industries targeted to complement the state's assets. For more information, please visit www.wyomingbusiness.org.

APPENDIX F: ADDITIONAL SURVEY DATA

This section of the document contains tabulations of the narrative responses provided by participants in the 2011 Wyoming Fair Housing Survey. Each table presents answers provided in the question stated in the table title. Respondent answers have not been edited.

FAIR HOUSING SURVEY

Table F.1 Primary Role of Respondent City of Casper 2011 Fair Housing Survey	
Role	Total
Advocate/Service Provider	3
Banking/Finance	12
Concerned citizen	2
Construction/Development	2
Local government	1
Property management	5
Real estate	41
Total	66

Table F.2 Federal, State and Local Fair Housing Laws City of Casper 2011 Wyoming Fair Housing Survey					
Question	Yes	No	Don't Know	Missing	Total
Do you think fair housing laws are useful?	43	2	3	18	66
Are fair housing laws difficult to understand or follow?	8	37	3	18	66
Is there a training process available to learn about fair housing laws?	38	2		26	66
Have you participated in fair housing training?	36	3		27	66

Table F.3 Fair Housing in the Private Sector City of Casper 2011 Wyoming Fair Housing Survey					
Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
The rental housing market?	4	31	10	21	66
The real estate industry?	4	31	10	21	66
The mortgage and home lending industry?	6	27	11	22	66
The housing construction or accessible housing design fields?	2	28	14	22	66
The home insurance industry?	1	27	16	22	66
The home appraisal industry?	3	27	14	22	66
Any other housing services?	1	27	16	22	66

Table F.4
Fair Housing in the Public Sector

City of Casper
2011 Wyoming Fair Housing Survey

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
Zoning laws?	2	28	9	27	66
Land use policies?	1	29	10	26	66
Occupancy standards or health and safety codes?	2	27	11	26	66
Property tax policies?	0	29	10	27	66
Housing construction standards?	0	29	11	26	66
Neighborhood or community development policies?	1	25	13	27	66
Limited access to government services, such as employment services?	1	31	8	26	66
Compliance issues with any public housing authority?	0	33	7	26	66
Public administrative actions or regulations?	0	27	13	26	66

Table F.5
Fair Housing Activities in Wyoming

City of Casper
2011 Wyoming Fair Housing Survey

Question	Yes	No	Don't Know	Missing	Total	
Are you aware of any fair housing testing?	8	20	10	28	66	
Are you aware of a fair housing plan in Wyoming?	6	21	11	28	66	
Are there geographic areas in Wyoming that have fair housing problems?	2	5	30	29	66	
Are fair housing laws in Wyoming effective?	19	3	16	28	66	
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity in Wyoming?	9	19	1	9	28	66
Is there sufficient testing in Wyoming?	2	6	1	6	51	66

Table F.6	
Primary Role of Respondent	
City of Cheyenne 2011 Fair Housing Survey	
Role	Total
Advocate/Service Provider	3
Banking/Finance	10
Concerned citizen	1
Local government	2
Property management	5
Real estate	34
Other (please specify)	1
Total	56

Table F.7					
Federal, State and Local Fair Housing Laws					
City of Cheyenne 2011 Wyoming Fair Housing Survey					
Question	Yes	No	Don't Know	Missing	Total
Do you think fair housing laws are useful?	38	4	1	13	56
Are fair housing laws difficult to understand or follow?	11	31	1	13	56
Is there a training process available to learn about fair housing laws?	38	3	.	15	56
Have you participated in fair housing training?	36	5	.	15	56

Table F.8					
Fair Housing in the Private Sector					
City of Cheyenne 2011 Wyoming Fair Housing Survey					
Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
The rental housing market?	4	33	2	17	56
The real estate industry?	2	34	3	17	56
The mortgage and home lending industry?	3	32	4	17	56
The housing construction or accessible housing design fields?	1	30	8	17	56
The home insurance industry?	1	30	8	17	56
The home appraisal industry?	1	31	7	17	56
Any other housing services?	0	32	6	18	56

Table F.9
Fair Housing in the Public Sector
 City of Cheyenne
 2011 Wyoming Fair Housing Survey

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
Zoning laws?	2	31	4	19	56
Land use policies?	1	31	5	19	56
Occupancy standards or health and safety codes?	2	30	5	19	56
Property tax policies?	0	32	5	19	56
Housing construction standards?	1	29	6	20	56
Neighborhood or community development policies?	1	30	6	19	56
Limited access to government services, such as employment services?	4	27	5	20	56
Compliance issues with any public housing authority?	2	30	3	21	56
Public administrative actions or regulations?	1	27	9	19	56

Table F.10
Fair Housing Activities in Wyoming
 City of Cheyenne
 2011 Wyoming Fair Housing Survey

Question	Yes	No	Don't Know	Missing	Total	
Are you aware of any fair housing testing?	11	19	7	19	56	
Are you aware of a fair housing plan in Wyoming?	9	20	7	20	56	
Are there geographic areas in Wyoming that have fair housing problems?	1	5	31	19	56	
Are fair housing laws in Wyoming effective?	22	4	11	19	56	
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity in Wyoming?	8	14	0	15	19	56
Is there sufficient testing in Wyoming?	1	2	1	17	35	56

Table F.11	
Primary Role of Respondent	
Remainder of State 2011 Fair Housing Survey	
Role	Total
Advocate/Service Provider	10
Banking/Finance	26
Concerned citizen	19
Construction/Development	5
Local government	23
Property management	23
Real estate	186
Other (please specify)	19
Missing	3
Total	314

Table F.12					
Federal, State and Local Fair Housing Laws					
Remainder of State 2011 Wyoming Fair Housing Survey					
Question	Yes	No	Don't Know	Missing	Total
Do you think fair housing laws are useful?	194	11	19	90	314
Are fair housing laws difficult to understand or follow?	50	147	28	89	314
Is there a training process available to learn about fair housing laws?	162	11	.	141	314
Have you participated in fair housing training?	155	25	.	134	314

Table F.13					
Fair Housing in the Private Sector					
Remainder of State 2011 Wyoming Fair Housing Survey					
Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
The rental housing market?	21	153	31	109	314
The real estate industry?	8	174	22	110	314
The mortgage and home lending industry?	12	161	31	110	314
The housing construction or accessible housing design fields?	10	151	44	109	314
The home insurance industry?	3	150	51	110	314
The home appraisal industry?	6	155	42	111	314
Any other housing services?	5	145	52	112	314

Table F.14
Fair Housing in the Public Sector
 Remainder of State
 2011 Wyoming Fair Housing Survey

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any questionable practices or barriers to fair housing choice in:					
Zoning laws?	9	164	26	115	314
Land use policies?	5	166	28	115	314
Occupancy standards or health and safety codes?	11	158	30	115	314
Property tax policies?	5	161	31	117	314
Housing construction standards?	5	159	32	118	314
Neighborhood or community development policies?	5	158	36	115	314
Limited access to government services, such as employment services?	10	149	31	124	314
Compliance issues with any public housing authority?	0	162	33	119	314
Public administrative actions or regulations?	7	132	58	117	314

Table F.15
Fair Housing Activities in Wyoming
 Remainder of State
 2011 Wyoming Fair Housing Survey

Question	Yes	No	Don't Know	Missing	Total	
Are you aware of any fair housing testing?	48	99	39	128	314	
Are you aware of a fair housing plan in Wyoming?	39	107	39	129	314	
Are there geographic areas in Wyoming that have fair housing problems?	9	30	146	129	314	
Are fair housing laws in Wyoming effective?	103	6	77	128	314	
Testing and education	Too Little	Right Amount	Too Much	Don't Know	Missing	Total
Is there sufficient outreach and education activity in Wyoming?	48	75	7	56	128	314
Is there sufficient testing in Wyoming?	6	30	2	38	238	314

Table F.16
Are you aware of any questionable practices or barriers to fair housing choice in the rental housing market

State of Wyoming
 2011 Fair Housing Survey

Comments

Age discrimination with young people especially in Laramie

Children are not allowed

Cost is a barrier

Feel there is discrimination at all levels.

Having only been in Casper for three years, I think the price of renting here is outrageous. I cant imagine making less money or having children to care for also. I hope there are enough lower priced options for those that really need it.

I occasionally hear of familial status discrimination, mostly by the unlicensed public who are landlords

i'm aware that the general public does not provide the disclosure to tenants that we use in the " Real Estate "world. When I sell investment property, I provide the client with the proper form to use.

In our area there are places to rent for the minorities, disadvantaged and low income, but not for others.....discrimination?

In our community we have at least one landlord who will not rent to an unmarried couple

In Torrington there is bias against Hispanics and Dept. of Corrections Employees. When potential renters leave name and contact info, oftentimes they do not receive a call back if they have Hispanic surname. Very subtle discrimination.

Individuals with families are denied housing in some parts of Wyoming. I have had it reported individuals that speak Spanish are denied housing.

It seems like landlords can be too selective in a rental applicant based on factors such as gender, religion or family status.

Lack of available choices for rental

Lack of low-income housing especially for men. While single women are often given preference, single men often are discouraged to seek low income assisted housing.

Landlord is required to maintain the property in a safe and sanitary condition. Every tenant must comply with any requirements affecting health and safety to include maintaining their space in a clean and safe condition.

landlords descriminate based on age and with the increasing usage if credit reporting and all of its inaccuracies people are being denied housing because of credit scores.

many landlords do not recognize the role of "support animals" which now can be emotional support

Many of the rental owners don't keep the properties up and have horrible living conditions for tenants but they can't afford to find alternate housing. There should be someone to monitor these slum lords.

No allowance for family pets. Significant barrier in Park County.

Pet discrimination

refusing to rent to a person due to race, sex, marital status

renter can withhold if applicant fails to complete background check such as credit score

Shortage of affordable housing for larger families, Our area has mostly 2 bed room apartments with very few 3 or 4 bed room units available for rent

Shortage of low income housing availability.

Some folks manage rental property with out a Real Estate License

There are some landlords that won't rent to college students

won't rent to casino employees

Table F.17
Are you aware of any questionable practices or barriers to fair housing choice in the real estate market

State of Wyoming
2011 Fair Housing Survey

Comments

Cost is a barrier

Deed Restrictions, Advertising, Occupancy Standards, Equal Professional Service Model,(a set of policies and procedures to help its users provide the same level of service to all).

Deny showing or renting: to a person with several children, racially different person, a handicapped person, person with different national origin or color.

Housing prices are so badly inflated around Wyoming it is difficult to buy a house in good shape for an affordable cost.

I am aware of what we cannot do.

I believe that licensed real estate agents are very aware and sensitive to fair housing issues.

Increased scrutiny of lending practices makes it very difficult to lend to low-mod income levels which would make banks appear to be discriminatory in their lending practices.

Many real estate agents have purchased housing that was intended for low income families to purchase a home, so that they could rent those houses out to the very people the houses were intended to be sold to. It's a "free country" but that practice is counter-productive to the health of our communities, in some ways. I don't like the idea of limiting that practice, but there are other ways (such as Habitat for Humanity) that can keep that practice from happening without legislating against it.

Most cases are only a short term problem

One of our local realtors does not always conduct themselves in an ethical manner

One thing that I have seen that has concerned me is when the broker for a house that is for sale also has the buyer. I think there can be some ethical issues with that and prefer that they would be two separate people even if its within the same company. Who is watching out for who?

See above.

Shortage of low income housing availability.

There are programs like WRAP that do not allow for individual representation to those who need it the most. This is a low income program that prohibits from an agent working with their clients to obtain good housing. You are sending a message that is wrong. Not only should they not receive representation but our representation does not have any value. Some of the response has been that there are agents that DO NOTHING to earn their fee - and I agree. You can find this type of argument for every single industry today. That does not meet the test for accountability for this action. You also know there are many, and I would say most, of the agents today do represent their clients, and do a great job.

Table F.18
Are you aware of any questionable practices or barriers to fair housing choice in the mortgage and home lending industry?

State of Wyoming
 2011 Fair Housing Survey

Comments

Age - buyer was told they are too young to buy (age 23)

Federal legislation/not enough regulation on collection agencies for accurate reporting to credit bureaus/ever changing FHA regs. are putting themselves out of business by no longer assisting the consumers it was designed to help.

I have a problem with basing lending off of appraised values. I think we need to focus on income and paying for things and less on the appraisal side. I feel that appraisals are part of what has screwed this housing market up completely.

I think lenders are still not being fair to women often times and are often discriminated against. One day that will change, but has not as of yet.

I use someone outside of Casper. USAA.

judging by the foreclosure notices in the Casper and Riverton newspapers a lot of lenders arranged home ownership for people who could not possibly pay the mortgage, unethical if not discriminatory

Laws ae changing because of housing crisis. Gap between change and implementation

Little ability to finance existing manufactured homes

refusing to lend to a person based on race, ethnicity, sex, marital status, disability

same as #2

Some mortgage company's not willing to discuss interest rate until a face to face visit.

Some of the online mortgage lenders are literally clueless as to what fair housing is all about. They only care about the bottom line

The differences of closing costs and rates.

The lenders that have always provided honest service and good loans are being discriminated against

The mortgage industry is driven not necessarily by supply and demand - but by what the government allows and what kind of quota's are put out. If the government says that in order to receive a guaranty you must accomplish.... number of home loans to the under served population then lenders do what ever it takes to meet those quotas. This creativity often is thinking outside of the box - then if it is not prohibited it must be okay. Even when it is not. Some people are not equipped to be home owners. They not only do not have the funds - they do not have the credit available nor the skills needed to maintain their homes. Secondary markets often drive what type/kind of financing available. Short sales - foreclosures - the entire system needs to be revamped. Quality control - review - final - what ever the name of the step in process really does have a company or person behind the process.

the new lending policies have made securing a mortgage literally a moving target for borrowers. The policies obviously had to change but the inconsistency wiht respect to what the rules are is a concern.

The profiteering by the banks and WCDA on non-profits that are attempting to help provide affordable housing is unconscionable. There needs to be some way that the for profit sector can actively partner with the non-profit sector in Wyoming.

The recent changes of lenders requiring higher credit scores is making it more difficult for the typical person or family to qualify for a home loan.

Women are discriminated against.

Table F.19
Are you aware of any questionable practices or barriers to fair housing choice in the housing construction or accessible housing design fields?

State of Wyoming
 2011 Fair Housing Survey

Comments

Cost and availability of choice are a problem in our area.
 Getting better for the disabled. Wider doors, hallways, etc.
 I feel that construction practices are messed up the fact that the lowest bidder gets the job and it is not an interview practice and we are not qualifying people that do get the jobs is a problem.
 I wish all homes were designed with wider hallways, doors, and roomier baths.
 Lack of handicap accessible, constructed apartments.
 Limited availability of accessible housing; limited income of individuals needed accessible housing
 Most new construction is not easily accessible to the disabled
 Not enough handicap accessible housing. Would be nice to have some money/low interest money available to rental property owners for conforming their property
 Quality of construction, sizes and number of rooms. Physical limitations of the housing, Zoning laws, and capacity of the building, such as sewer and septic.
 Reasonable prices
 The high cost of land development makes it difficult to build affordable housing.
 very little low or middle income price range homes are constructed. Here in Riverton the City council in Feb 2011 voted down a developers request for permission to build low/medium income housing...apparently do not want that kind of thing around the town
 Would like to see more single family homes available for seniors one level homes, at affordable prices, newer construction.

Table F.20
Are you aware of any questionable practices or barriers to fair housing choice in the home insurance industry?

State of Wyoming
 2011 Fair Housing Survey

Comments

Affordability is a barrier Whether it is a questionable practice I am not sure I am qualified to answer.
 Again, use USAA.
 Basing rates on credit scores/requiring higher deductibles for wind and hail/cancellation of insurance for any number of reasons.
 Using credit scores in pricing
 Why is it optional to get a home inspection, it should be mandatory or automatic. Buying a home is so complicated sometimes that it should be written in bank mortgages that we have to have one no matter what that way so nobody buys a house with problems. Or at least they'll know what needs to be fixed.

Table F.21
Are you aware of any questionable practices or barriers to fair housing choice in the home appraisal industry?

State of Wyoming
 2011 Fair Housing Survey

Comments

Appraisals appear to be a joke...Not real examination of property by drive thru neighborhood and look at area values vs serious assessment of property

Appraiser's having information from real estate company's about the amount a buyer is willing to sell house for.

Difficult to get a fair appraisal

Industry should have the right to question any appraisal. VA loans do - prior to the appraisal becoming of record. Ever since the industry stepped up practices of accountability some appraisers have taken that to mean they must be extremely conservative - or they will be held liable. Reasonableness must apply first - we are all doing a disservice to our customers and clients.

Lincoln County appraisers are using REO and Short Sales as Comps for Non-Distressed Sales. They have created values for less than one can build for even if the land was free. Major problem in the Star Valley Area.

Not enough appraisers to make the procedure time efficient
 same as #2

The home appraisal system is a joke! The appraisals are often times aimed at what the loan value is (working FOR the banks), instead of an independent assessment of actual market worth.

Yes, we have built relationships w/ certain appraisers who have a good reputation, and now we have to order appraisals on a revolving basis and many of these appraiser have not earned the business

Table F.22
Are you aware of any questionable practices or barriers to fair housing choice in any other housing services?

State of Wyoming
 2011 Fair Housing Survey

Comments

"Low income housing" in many cases is priced significantly above low income levels

Because of the size of our community, Section 8 housing is not available and there are no other programs that some of our disabled neighbors can use, most times they have limited resources.

I feel people get stereotyped a lot in Gillette, WY

I often wonder how effectively senior citizens are able to access long-term care residential options. The recent financial scare in Casper seemed to threaten housing for many seniors in a nursing home there.

The entire housing industry is upside down currently. Short sales and repos are driving the market. An issue with this is the lenders keep moving the target. It is making it nearly impossible to compete when you don't know the rules.

what to do if there is a signed year lease and there is untreated mold problem by the landlord.

Table F.23
Are you aware of any questionable practices or barriers to fair housing choice in zoning laws?

State of Wyoming
 2011 Fair Housing Survey

Comments

cheyenne ahs alot of pockets that are not incorprated into city
 Hard for the public to access this information.
 Having to have neighbors approval for zoning changes.
 Local zoning laws in Gillette, do not account for recent court rulings under the Religious Land Use of Institutionalized Persons Act (RLUIPA).
 Our local building inspector does not always conduct full inspections during or after building projects residential or commercial
 Restrictions on where manufactured housing can be installed
 Some of the extremely old zoning laws have questionable practices but our City has tried to rewrite any containing discrimination
 Teton County has too many NIBY's, tough to build affordable housing!
 There are still communities in Wyoming that have discriminatory zoning ordinances against Hud code homes, despite the federal preemption.
 Zoning is a "political tool" controlled by money. If you have the money, you can do whatever you want. This is very prevalent in Cody.

Table F.24
Are you aware of any questionable practices or barriers to fair housing choice in land use policies?

State of Wyoming
 2011 Fair Housing Survey

Comments

city seems to favor certain properties where they can use (at least in past) various incentives. For example, airport parkway is nicely lanscaped. Cole property along converse has more trees than city park. This makes these properties more valueable than efforts to maintain/retain other neighborhoods.
 Depends on what Special Interest Group is either representing the land or wants USE of the land.
 Local zoning laws in Gillette, do not account for recent court rulings under the Religious Land Use of Institutionalized Persons Act (RLUIPA).
 Same as above
 Teton and Lincoln Counties, They forget there is only 3% of land that could be developed and their restrictions do not foster balance growth of housing and job development.

Table F.25
Are you aware of any questionable practices or barriers to fair housing choice in occupancy standards or health and safety codes?

State of Wyoming
 2011 Fair Housing Survey

Comments

Cities and towns are making it difficult for unrelated adults to share housing costs

i believe that there are statutes addressing health and safety concerns although i have never heard of any enforcement of even common sense requirements for functioning utilities, fire safety, environmental toxins, eetc

In Teton CO, WY 4 or more unrelated people may not have a house or apt. together

Issues of mold or meth houses and there clean up.

Many of our local landlords rent substandard housing units. Since there is a fair amount of demand for rental units, landlords have very little incentive to improve the conditions of their rental units

many of the codes cause the construction cost and the operating cost to increase.

Meth use in a house has no "state" clean up qualifications or notices!

No clear definition of occupancy standards available

Privacy Act issues in conjunction with application process

Safety codes regarding smoke detectors and carbon monoxide codes are lacking. Codes regarding basements exits for fire. Window wells that are not easy to climb out of and easy to fall into.

The entire gambit of regulation is totatlly over the top. The cost of enforcement is unrealistic and the purpose of many regulations imposed prior to occupancy are impractical.

There don't seem to be many for rental properties.

These are also unclear to the average public citizen.

This is an area that is difficult to work with only because i find the law re: occupancy to be vague and open to varriation. Meaning a that nothing is written that states the exact numbers you can have and when.

UBC are unknown to the Cody area.

Table F.26
Are you aware of any questionable practices or barriers to fair housing choice in property tax policies?

State of Wyoming
 2011 Fair Housing Survey

Comments

As values have decreased, so should property taxes.

Look at teton Co. or similar areas , where big money moves in to an Ag (Farm Ranch area) and put in Multi-million dollar improvements. The county easements go up for everyone.

Once you appraised value of your home goes up it never comes down unless you appeal with an appraisal.

Property taxes continue to rise and thereby make affordable/fair housing more difficult for the low income families that make up a majority of our population.

This needs to be looked at I like the idea of locking in property taxes when a property is purchased and not reappraising until the property sells. We shouldn't make people move out of their house because the values went up.

Table F.27
Are you aware of any questionable practices or barriers to fair housing choice in housing construction standards?

State of Wyoming
2011 Fair Housing Survey

Comments

All voluntary unless a vigilant bank/lender is involved
Better oversight in the past 5-10 years through Building permits in cities, but the county is still lacking.
Building affordable housing within the city is very difficult with new planning laws and requirements for infrastructure.
Lincoln County, no standards for foundations, electrical and plumbing, framing standards are suspect. Drawings on the back of a napkin can be acceptable in certain areas of the County. Only concern is septic systems and State electrical inspection at the end of the job.
Refer to above comment under "Zoning"
Same as number 1
we need better inspectors and more of them

Table F.28
Are you aware of any questionable practices or barriers to fair housing choice in neighborhood or community development policies?

State of Wyoming
2011 Fair Housing Survey

Comments

Also improving.
Handicap facilities
I know that a Douglas neighborhood previously was able to discourage the City Council from approving a conditional use permit for expanding the nursing home there.
Not very thought out and outdated. Money is the issue I assume!
see #2
Yes, there is a subdivision in Sheridan in which the covenants say "no persons of color" are allowed in the subdivision. It is an old subdivision but the covenants are still of record. - Country Club Estates

Table F.29
Are you aware of any barriers that limit access to government services, such as public housing, transportation or employment services?

State of Wyoming
 2011 Fair Housing Survey

Comments

Because of the size of our community, people who are handicapped don't have access to Section 8 assistance.

City is making efforts at improving bus service. But, transportation needs to go into the evening. Public services need to change their access policy...open earlier and later and saturday mornings. (Need to resposnd to real world.)

funding is not generous

Lack of a cost-effective public transportation system in Gillette.

limited public transportation

Limited resources for public housing and transportation

Most Wyoming communities have barriers of transportation.

Public transportation is limited locally, and older people don't realize that they can ask for help or call the limited service that we do have.

See #3 above

The application process is very complicated and if a person does not have an advocate, sometimes they are not processed appropriately.

The county building are not handicap accessible out on the archer ext

The fee (\$25 and up) for low income houseing application forms seems odd.

To qualify for public housing assistance you must be elderly or have children. What about the younger single or married couples that are unable to obtain adequate housing because of income that chose to make wise choices about child bearing? They are highly discrimated against.

Transportaion is a problem for many Wyoming communities, and is always a problem in rural areas.

We have no public transportation in Dubois, Wyoming except for a Senior Citizen bus that gives limited service

Table F.30
Are you aware of any fair housing compliance issues with any public housing authority?

State of Wyoming
 2011 Fair Housing Survey

Comments

As stated above.

WCDA's current contract will restrict banks and credit unions from using their product as the originator will retain a contingent liability to buy loans back.

Table F.31
Are there any other public administrative actions or regulation that act as barriers to fair housing choice?

State of Wyoming
 2011 Fair Housing Survey

Comments

Government programs on a national and state level - too much talk and not enough action. HUD, Rural Development, WCDA and others say they have programs but often times either have no funding or the pathways to the funding are cumbersome and overcomplicated. Local Governments are slow if interested at all, to take significant action to better the affordable and fair housing issues in any given community.

Legislature seems to be out of sink with real housing needs of Wyoming!

Licensed Broker's who live out of State part time do not have reasonable timeframes to get to 3 day continuation courses. These courses should be available for the same fees as onsite courses. From California, it will cost a minimum of \$1,500 to do these 3 day courses in Jackson Hole. Seems unreasonable, considering the State of California has the toughest regulations in the Nation.

People convicted of a felony cannot access low income housing. This poses a housing problem for some individuals. Length since time of crime could be considered.

The City of Gillette tried to trade a property (meth house they confiscated), according to my client, for his property that they were trying to get him to sell to them. He drove me past the offered property. I advised him to call the Dept. of Housing and Urban Development. He did not as he was Mexican and has a language barrier. The city ended up paying for his home eventually. It was not a good situation.

The city of Riverton city council's practice of trying to steer low income housing placement when many of the tenants of those projects are of one or more protected classes.

The newer, nicer apartments are reserved for minorities, low income, and disadvantage....others have a tough time finding a nice place!

Wyoming has not adopted tenant rights legislation and is one of the few states that does not have this tool available for tenants

Table F.32
What are the geographic areas with fair housing problems and what types of issues do these areas have?

State of Wyoming
 2011 Fair Housing Survey

Comments

Any college town in Wyoming

Any of the Wyoming cities except for Cheyenne and Casper lack any or little fair housing apartments.

anywhere there are college students, the working poor or non-whites that want to rent or buy

Carbon County as whole, especially with extremely high rent in Rawlins

Central Wyoming

If any,,I suppose the resavations might have problems

Jackson Hole--limited housing available to lower income families.

Northwestern Wyoming in regards to rental discrimination

Park County, Big Horn County

Southwest Wyoming- lack of available housing

The fair housing problems exist throughout the entire state of Wyoming. The complaints I hear are families do not receive housing because of children and the number of children. Non English speaking families may not have access to safe and decent housing.

unsafe or unsound

Wyoming has several pockets of communities that struggle with fair housing. A lot of the smaller communities do not have anything in place. Even larger areas have sections of towns that trouble gaining access to fair housing services.

Table F.33
How should fair housing laws be changed?

State of Wyoming
2011 Fair Housing Survey

Comments

As I stated previously about aiding single or married couple with no children and are low income obtain adequate housing.

I think the state needs to implement its own rules and not rely on the national ones

I would like to see the government get out of all aspects of our lives.

I would like to see the State of Wyoming pass Fair Housing Legislation.

More enforcement especially when it comes to ADA construction

Only the national laws. I believe there should be laws at the state level as well.

Perhaps enforcement of existing rules would be a good start, perhaps clarification of a property owners rights such as no pets, smoking, children, junk cars, fair deposits etc would help, and some requirement that at least rental properties actually be safely inhabitable

The laws need to change on the state level to allow for educational opportunities throughout the state instead of compliance only. It would be helpful to have a state entity responsible for Fair Housing laws. Without a presence on the state level individuals are not treating fairly in regards to housing matters.

Table F.34
Please share any additional concerns regarding fair housing

State of Wyoming
2011 Fair Housing Survey

Comments

(4) I am aware of a Cheyenne Fair Housing plan. (1 and 3) We have fair housing covered in our real estate classes, AND self training, but I would think that there can never be too much training.

due to the fact that there is not a fair housing office in Cheyenne or some surrounding areas, HUD investigates complaints from the area very thouroughly and may have more strict consequences for violations.

Fair housing is more than a set of rules and making sure everyone knows and abides by the rules. Fair housing is also about making sure that there are programs and/or funding available to assist low income families access rental housing or purchase housing, depending on their choice. These must be accessible and easy to negotiate... in other words... a person shouldn't need a college education to negotiate through the paperwork and legal language of it all. The very government programs that are designed to make things "fair" are overcomplicated and way too cumbersome to actually help very many people. Too much surveying and trying to make the programs fail safe, causes things to become bloated and incapable of helping the people they were designed to help.

For my role in Fair Housing compliance, I have to worry about my own interaction with clients and the behavior of my peers.

Get our legislators to finally provide a state fair housing

HUD does a great job setting the standard.

I am an out-of-state Wyoming broker. I have never sold any houses in Wyoming so that is why I answered Don't Know on much of the survey. I believe people are very aware of not discriminating and to continue to harp on it only makes people more conscious of our differences.

I believe the public is quite aware of "fair housing" some just threaten you with that- more so in other states than here in Wyoming.

I don't think there is any need to try to "trap" people into violations. Doing the wrong thing on purpose is where the wrong action is.

I have been lending in Wyoming for the past 30 years. I think that we are fortunate that we live in a State where discriminatory practices are not tolerated in any sector of the industry.

I have rented to handicapped people, people of religions that I don't care for, different nationalities, and different races. Of course, I rent to people of different sexes, and different familial statuses. As a Landlord, I do not feel it is my responsibility to determine the moral status of people. Regardless of who, or what they are, my only interest is whether renters keep the property in good condition, do not make disturbances for the police and neighbors, and pay their rent in full and on time.

I think both of the main Real Estate licensing schools do a very thorough job of emphasizing the importance of fair housing. It is also emphasized in the Real Estate "Code of Ethics"

I wish there was more education for property managers to assist people that have a complaint on how to file a report and to assist prospects in what is a violation.

I would like to see some sort of class held on an annual basis regarding fair housing policy in Wyoming.

In my 18 years of experience, Wyoming real estate agents are well aware and compliant to fair housing laws. Realtors are required to have fair housing classes with the WY real estate commission as well as with our local Boards of Realtors. This is a very important issue and is taken very seriously in Wyoming.

none

Often the ones that are trying to enforce fair housing as with numerous other governmental mandates are the same agencies that make it impossible for people to accommodate the consumers that are being protected.

People have the right to buy, sell, and rent homes according to their monetary budget. They have the right to expect a decent and habitable place to live. If people do not have the funds to purchase any type of housing, they have the right to ask for help. Other than these rights, we don't need any other laws governing housing.

Sometimes it seems like over reach. For example if I were to go to a new community I'd want to live near my church. If there were two, I'd want the best church. That may be an iffy question to ask a Realtor.

The complexities of the law are difficult to apply because even the wording of what was thought to be an innocent statement may have far reaching implications.

The inconsistency in financing and cost of regulation appear to me to be the two biggest challenges/barriers for middle to low income customers.

The only ones that have concerns with the fair housing laws are the ones whom don't want to follow them. It's not an issue with me what color someone's skin is or their disability or anything else for that matter. I have an issue with the person it does bother!

The rights and responsibilities of both renter and property owner need to be much more clear from the beginning. A major problem I see is desperate people settling for living in unsafe ramshackle places-

These agencies should be shut down to help balance the budget.

to many tax dollars are spent on this type stuff---we cant afford to keep writing the checks !!!!!!!!!!!

We are still currently the only state without fair housing laws. This needs to be addressed.

While it is inexcusably wrong to discriminate against someone who is a member of a so-called "protected class" who is financially able and who would be a non-destructive, non-disturbing tenant or neighbor, overzealous enforcement of non-discrimination laws when the real reason the member of the so-called "protected class" has been denied, evicted, or foreclosed is for being a dead-beat and a bum creates a backlash. This is unfortunate and produces a result contrary to the spirit and intent of the law.

With 24 years of experience in the real estate industry in Casper, it has been my observation that Fair Housing Training was insufficient during the last decade. The required education courses cover this topic fairly well; but since this is such a serious issue an extensive class should be taught at least once each year for all real estate professionals.

Would like opportunity for formal educational seminar, other than online.

Wyoming should have a State fair housing act.

NON-ENTITLEMENT COMMUNITY SURVEY

Table F.35 Does your jurisdiction have, by ordinance, policy or practice, a definition of "family"? State of Wyoming 2011 Non-Entitlement Community Survey Data
Comments
<p>"Family: An individual or two (2) or more persons related by blood or marriage or a group of not more than five (5) persons living together as a single housekeeping unit in a dwelling unit." Ord. 5-5-7</p> <p>"Family" means any individual, or two (2) or more persons related by blood or marriage, or a group of not more than four (4) persons (excluding servants) who need not be related by blood or marriage, living together as a single housekeeping unit.</p> <p>17.16.140 Family. "Family" means one or more individuals living independently as a single house-keeping unit and using certain rooms in common. A family may include two persons not related by blood or marriage. A family shall not be deemed to include the occupants of a college dormitory, motel/hotel, boarding house, or residential club.</p> <p>A family is any number of persons related by blood or marriage who reside in a single-family dwelling or multi-unit dwelling.</p> <p>As used in Zoning Ordinance</p> <p>FAMILY One or more persons, related by blood, adoption or marriage, occupying a premises and living as a single housekeeping unit as distinguished from a group occupying a boardinghouse, fraternity or sorority house, lodging house, hotel or motel.</p> <p>Family - Any individual or two (2) or more persons related by blood or marriage or a group of not more than four (4) persons (excluding servants), who need not be related by blood or marriage, living together as a single, non-profit housekeeping unit.</p> <p>Family - One (1) or more persons living together as a single housekeeping unit.</p> <p>Family is defined in the zoning ordinance as an individual or two or more persons related by blood, marriage, or legal adoption, or duly authorized custodial relationship, living together in a dwelling unit as a single housekeeping unit.</p> <p>Family means one or more persons occupying the premises and living together as a single nonprofit housekeeping unit.</p> <p>Family: Any number of individuals living together as a single housekeeping unit. (Zoning Ordinance, §13-601)</p> <p>One individual, or a group of two or more persons related by birth, adoption or marriage, who occupy a single housekeeping unit or a group of not more than four unrelated persons who occupy a single housekeeping unit. This is from current Zoning Ordinance which was approved in 1978. City Planner is in the process of updating the entire Zoning Ordinance to bring it current.</p> <p>One or more person living as a single household or housekeeping unit.</p> <p>One or more persons related by blood, marriage, or adoption living together within a single dwelling unit. A family may include foster children not requiring licensing by the state, domestic servants, or not more than two guests residing for a temporary time. A family may not, in any case, consist of more than three unrelated persons.</p> <p>Please see Section 24-105 of the Evanston City Code.</p> <p>Town Code: "Family means an individual or a collective number of individuals living together in one house under one head, whose relationship is of a permanent and distinct domestic character. However, this shall not include any society, club, fraternity, sorority, association, lodge, combine, federation, group, coterie, occupants of a counseling house, lodging house or hotel, or organization which is not a recognized religious order, nor include a group of individuals whose association is temporary or seasonal in character or nature."</p>

Table F.36
Does your jurisdiction have, by ordinance, policy or practice, a definition of "dwelling unit" or "residential unit"?

State of Wyoming
 2011 Non-Entitlement Community Survey Data

Comments

"Dwelling Unit: One (1) or more rooms in a dwelling or apartment hotel designed primarily for occupancy by one (1) family for living or sleeping purposes." a "Dwelling" is described as "A building or portion thereof, ...,designed exclusively for residential occupancy, including one-family, two-family, and multiple dwellings..." Ord. 5-5-7

"Dwelling unit" means one (1) or more rooms providing complete living facilities for one (1) family, including equipment for cooking or provisions for same, and including room, or rooms, for living, sleeping, eating and sanitation.

17.16.115 Dwelling. "Dwelling" means a building arranged, intended or designed to be occupied by one or more families living independently of each other upon the premises. (See also, "multiple dwelling" and "single-family detached dwelling".) 17.16.120 Dwelling, multi-family. A building designed for multiple residential units not located on separately platted lots. This can include apartments or condominiums. 17.16.125 Dwelling, single-family (attached). A building and accessory buildings (garage or storage facility) designed for use by a single household and constructed in a group or row but on a separately platted lot, which share a minimum of 50 percent or more of one exterior wall. 17.16.130 Dwelling, single-family (detached). "Single family detached dwelling" means a building, on a lot, designed and occupied exclusively as a residence for one family, and which has no part in common with an adjacent building. For the purpose of this Title it also requires a permanent foundation, eaves of six inches or greater and a roof pitch of 3/12 or greater.

2009 International Residential Code. 2009 International Building Code. (Commercial Buildings) Healthcare Facilities: National Fire Protection Association NFPA-101 Life Safety Code. 2003 ICC / ANSI A117.1 Accessibility Code

A building or portion thereof, which is designated or used exclusively for residential purposes.

As used in zoning ordinance

By ordinance specifying allowed lot sizes, buildings, etc.

DWELLING UNIT A structure or portion thereof used for living purposes or constituting a separate, independent housekeeping unit for permanent residential occupancy.

Dwelling unit - A structure or a portion thereof used for living purposes - or constituting a separate, independent housekeeping unit for permanent residential occupancy.

Dwelling Unit - One or more rooms providing complete living facilities for (1) family including equipment for cooking provisions for same and including room or rooms for living, sleeping, eating and sanitation.

Dwelling unit means a residence designed, arranged or used by one family for living or sleeping purposes, which contains kitchen and bathroom facilities for the sole use of the resident family.

Dwelling Unit means one or more rooms with provisions for cooking, living, sanitary, and sleeping facilities arranged for the use of one family.

Dwelling unit: A single unit providing complete, independent living facilities for one family including permanent provisions for living, sleeping, eating, cooking, and sanitation.

Dwelling Unit: A dwelling, or portion of a dwelling, used by one family for cooking, living, and sleeping purposes. (Zoning Ordinance, §13-601)

It has a definition of both a multi-unit and a single-family unit.

multiple family dwelling

not sure what you mean

One or more rooms providing complete facilities for one family, including including equipment for cooking provisions for the same, and including room, or rooms, for living, sleeping, and eating.

Our ordinances do not define dwelling but they do refer to single-dwelling, multi-family dwelling and mobile home dwellings - mostly as this concerns zoning.

Please see Section 24-105 Of the Evanston City Code.

The definition we use is in chapter 2 of the 2006 IBC

Town Code: "Dwelling means a structure or mobile home providing permanent, complete living accommodations."

Table F.37 Does your jurisdiction have, by ordinance, policy or practice, a definition of "disability"? State of Wyoming 2011 Non-Entitlement Community Survey Data
Comments
<p>By practice, the definition according to the State Statute</p> <p>Not in the Evanston City Code. The Evanston Business Leadership Network (EBLN) coordinates disability issues in our community. They may have a definition of "disability." Please contact the EBLN at 783-6302.</p> <p>Nothing mentioned in the Zoning Ordinance.</p> <p>The federal/state definition would be applied when circumstances require.</p> <p>We follow the federal and state requirements.</p>

Table F.38 Does your jurisdiction have, by ordinance, policy or practice, residential occupancy standards or limits on residential occupancies? State of Wyoming 2011 Non-Entitlement Community Survey Data
Comments
<p>As defined by the Building Codes.</p> <p>Based on standard Zoning Ordinances...</p> <p>I don't understand what you are looking for here.</p> <p>In certain residential districts boarders are limited.</p> <p>Occupancy standards as per the 2006 IRC</p> <p>Please note, however, we do not permit people to live in a recreational vehicle unless it is located in an approved mobile home park.</p> <p>Please see Section 24-17 of the Evanston City Code. Section 24-29 is currently being amended to reflect the occupancy limits of Section 24-17.</p> <p>R-1 single family residence, R-2 Multiple family residence, R-3 multiple residence zone</p> <p>SINGLE-FAMILY DWELLING A single, detached structure having but one dwelling unit for the residential occupancy of any number of persons related by blood, marriage or adoption and complying with the provisions of the International Building Code for dwellings. Editor's Note: Amended at time of adoption of Code (see Ch. 1, General Provisions, Art. I).</p> <p>There is an ordinance in place that regulates housing districts for Single-Family Residential, Medium Density Residential, Multifamily residential, and Mobile Home residential districts.</p> <p>Town Code: "Single Family Residential Zone - This zone is intended for only single-family residential use to maintain the country atmosphere of the Town. It allows for only single-family detached dwellings ... on parcels greater in area than 0.25 acres."</p> <p>Unlimited for a family related by blood, marriage, or other legal relationship. No more than three unrelated adults per dwelling unit in low density residential zones and no more than three unrelated adults per dwelling units in high density residential zones.</p> <p>We have adopted the IBC code and defer to state level regulations, if any to address questions for which we have no ordinance.</p> <p>What kind of limits??? Need to define or be more specific.</p>

Table F.39
Does your jurisdiction have, by ordinance, policy or practice, development standards for making housing accessible to persons with disabilities?

State of Wyoming
 2011 Non-Entitlement Community Survey Data

Comments

2009 International Building Code. (Commercial Buildings) 2003 ICC / ANSI A117.1 Accessibility Code. IMPORTANT NOTE: The A117.1 Accessibility Code has been granted "safe harbor" status by HUD.

applicable sections of the 2006 IBC and ansi 117.1

As defined by the Building Codes.

As per required in the 2006 IRC

Follow ADA requirements

In accordance with ADA Standards and 2006 IBC Building Codes.

No requirements for one-three dwelling units. Accessible units required for all other buildings as per the International Building Code.

Our policies and practices are to always uphold requirements and goals as required by governmental regulations.

people can request such things as sidewalk cut outs or ramps from the town council.

Please contact the Evanston Housing Authority at 789-2381.

Practice, and old written policies.

We follow federal and state ordinances, but currently have no "handicapped accessible" housing specific to that need.

We have adopted the IBC code and defer to state level regulations, if any to address questions for which we have no ordinance.

Table F.40
Does your jurisdiction have, by ordinance, policy or practice, a process by which persons with disabilities can request reasonable accommodations to the jurisdiction's codes, rules, policies, practices or services necessary to afford persons with disabilities an equal opportunity to use or enjoy a dwelling?

State of Wyoming
 2011 Non-Entitlement Community Survey Data

Comments

As defined by the Building Codes.

Generally allow private owners/residents the opportunity, as needed, to make any modifications to individual dwellings which might be required to accommodate a person with any disability. Any and all public buildings are expected to comply with Federal regulations regarding access to those with disabilities.

In accordance with ADA Standards and 2006 IBC Building Codes.

It is the practice that persons with disabilities can request housing at the HUD sponsored housing area within the Town, which is based on availability of units.

Ordinance contains procedures for waivers to building codes that would allow accommodation of persons with disabilities.

People may request said access from the town council.

Please contact the Evanston Housing Authority.

The City of Gillette Board of Examiners serves as the appeals board. Please note that we enforce the full measure of the ICC / ANSI A117.1 standard that fully complies with HUD accessibility requirements.

Through an application for building permit.

We follow federal and state law as well as good practice.

We have a "Conditional Use" process by which special accommodations can be formalized and defined.

We have the Board of Adjustment if the request does not fit our zoning ordinance.

We use ICC codes, and as well have the HUD Accessibility codes in place.

Table F.41
Does your jurisdiction have, by ordinance, policy or practice, guidelines that encourage the development of housing units affordable for low- and/or moderate-income households (so-called 'inclusionary housing') when other market rate housing is being developed?

State of Wyoming
 2011 Non-Entitlement Community Survey Data

Comments

Although, we do not use affordability as a measure when considering approval (either market rate or below). Also, we allow for replacement of mobile homes on existing lots, even if they are not zoned for manufactured housing. In addition, we are working on a rewrite of our Master Plan that would, as part of implementation, allow for accessory dwelling units on existing single family residential lots.

By practice, the council will give support in the form of water and sewer tap fees if a project can meet the same qualifications under the affordable housing program, and the developer has taken the necessary steps to have his/her product approved through the necessary funding agencies.

Old

Outlined in detail in 2008 Comprehensive Master Plan for the City and soon to be implemented into the new rewrite of the Zoning and Subdivision Ordinances.

The Town of Guernsey is currently encouraging both at this time.

There have been five tax credit housing developments built in the last six years.

There is a HUD sponsored housing area within the Town currently. However, there are no policies or practices in place for the development of new housing units to be developed.

We are a new town. Our master plan includes zoning for multiple family units that would accommodate this goal. The zone has not yet been adopted.

We are currently in the process of developing such policy and will hope to seek grant assistance for such development.

We do have a zoning District within which they are allowed but it is not exclusively designated.

We do have some low-income housing, and have made attempts to attract developers to our area.

We encourage housing developers to be sensitive to providing affordable housing. There is not an ordinance that requires a certain percentage of affordable housing to be provided as part of a market rate housing development.

Table F.42
Does your jurisdiction have, by ordinance, policy or practice, guidelines that encourage the development of mixed use or mixed income housing?

State of Wyoming
 2011 Non-Entitlement Community Survey Data

Comments

By practice

In Zoning Ordinance

Our zoning codes do provide for this, including a mixed use PUD

PUD

The current ordinances address mixed use, but do not address mixed income housing.

The Evanston 2010 Comprehensive Plan encourages mixed use areas.

The planning and zoning has included these types of occupancies in meeting minutes and voted affirmative.

They will be included in rewrite of Zoning Ordinance.

We allow for mixed use in our Downtown Zone and are working on a Master Plan update that will promote mixed use in more areas throughout town.

We are a new town. Our master plan includes zoning for mixed uses that would accommodate this goal. The zone has not yet been adopted.

We have a residential district that includes both single and multiple family dwellings as well as a residential district for single family dwellings. There are no restrictions as to the type of home that can be built as long as it meets the minimum standards set forth in the ordinance. It must be at least 900 square feet at the main level.

We have no exclusionary zoning in place.

Table F.43
Does your jurisdiction have, by ordinance, policy or practice, guidelines that distinguish senior citizen housing from other residential uses?

State of Wyoming
 2011 Non-Entitlement Community Survey Data

Comments

Again, we would defer to other regulatory agencies or adopted code guidelines.
 Building codes only.
 No standards. The 2010 Comp Plan addresses senior housing. The 2030 Comp Plan that is in the process of being crafted will also address senior housing issues.
 Our community does not currently have any designated senior housing, although we do require any new or altered construction to comply with current Federal and Local Building codes and regulations.
 They will be included in rewrite of Zoning Ordinance.
 This is a younger community, and those guidelines are being developed as the community ages.
 We adopt the International Building Codes.
 We are in the process of developing such policies.
 We have reduced parking requirements for senior housing projects.

Table F.44
Does your jurisdiction have, by ordinance, policy or practice, guidelines for developing housing for "special needs" populations?

State of Wyoming
 2011 Non-Entitlement Community Survey Data

Comments

Again, we have no policy prohibiting either.
 All developments fall under our zoning ordinance. It does not specifically address special needs.
 Assisted care facilities and group homes are addressed in Sections 24-17 and 24-18 of the Evanston City Code. They are treated the same as single-family residential dwellings in accordance with federal fair housing standards.
 For halfway house-as contained in zoning ordinance, and for group homes
 No new development has occurred in our area in many years, so the issue hasn't come up.
 Planning and Zoning Commission by practice

Table F.45
Does your jurisdiction have, by ordinance, policy or practice, guidelines for affirmatively furthering fair housing?

State of Wyoming
 2011 Non-Entitlement Community Survey Data

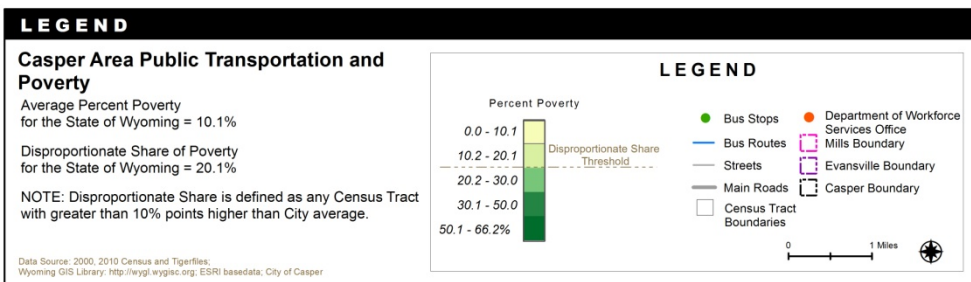
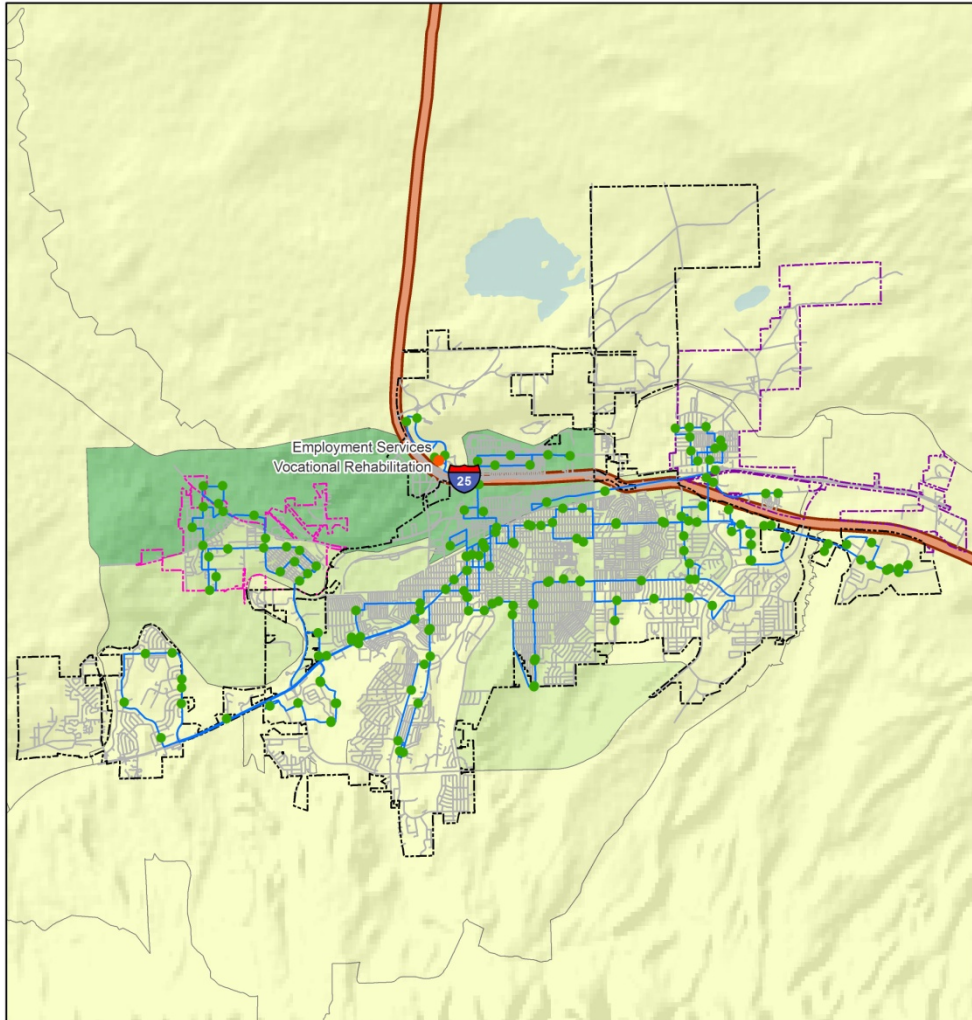
Comments

2009 International Residential Code. 2009 International Building Code. (Commercial Buildings) Healthcare Facilities: National Fire Protection Association NFPA-101 Life Safety Code. 2003 ICC / ANSI A117.1 Accessibility Code
 Both by policy and by practice.
 In general the council has always voted for fair housing.
 Not specifically, however, we do allow for replacement of mobile homes on lots even if they are not zoned for mobile home residential uses. Also, we allow for recreational vehicles to be placed in existing mobile home parks.
 Old resolutions
 Outlined in detail in 2008 Comprehensive Master Plan.
 Please contact the Evanston Housing Authority.
 Review by the Planning and Zoning Commission as projects come in and recommendations made to the council

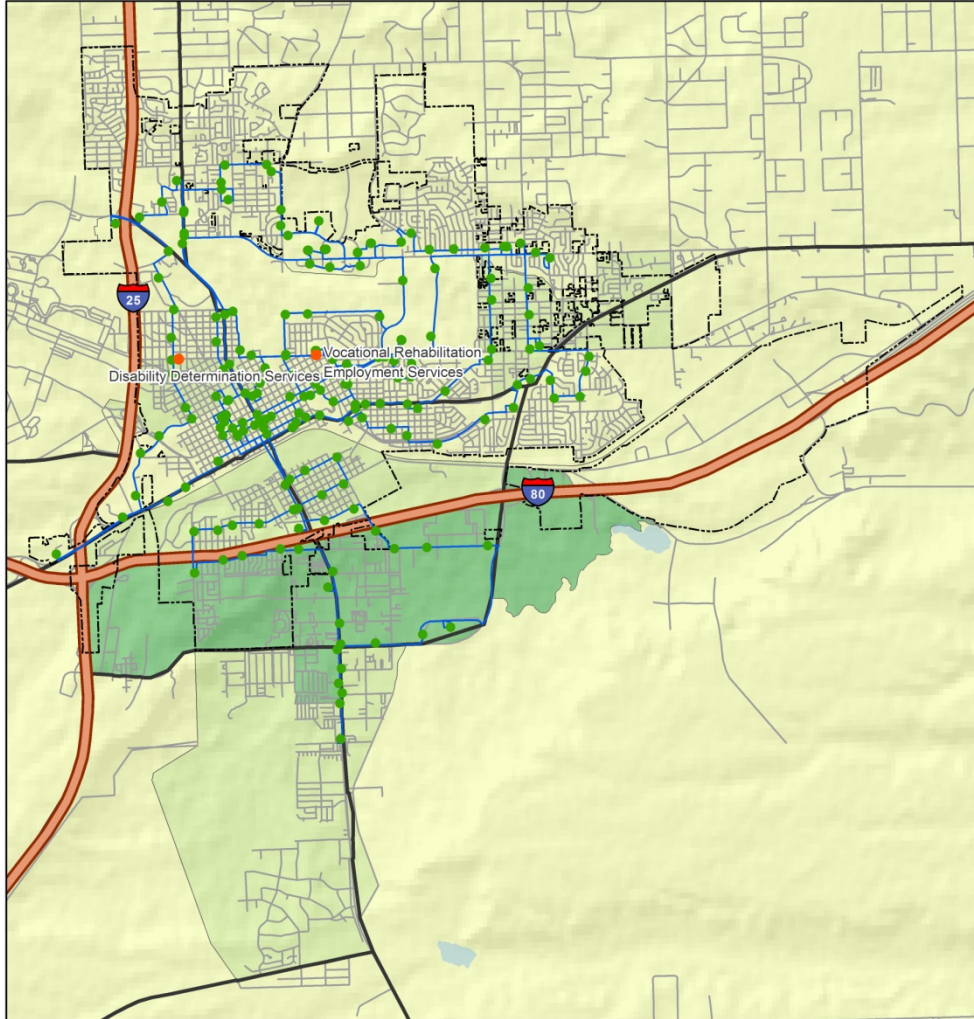
APPENDIX G: OTHER INFORMATION

This section presents poverty and transportation/job service maps for the cities of Casper and Cheyenne.

Map G.1
Transportation and Job Services in Relation to Poverty
 City of Casper
 Census and City Data



Map G.2
Transportation and Job Services in Relation to Poverty
 City of Cheyenne
 Census and City Data



LEGEND

Cheyenne Public Transportation and Poverty

Average Percent Poverty for the State of Wyoming = 10.1%

Disproportionate Share of Poverty for the State of Wyoming = 20.1%

NOTE: Disproportionate Share is defined as any Census Tract with greater than 10% points higher than City average.

Data Source: 2000, 2010 Census and Tigerfiles; Wyoming GIS Library: <http://wygi.wygis.org>; ESRI basedata; City of Cheyenne

