2017 STATE OF WYOMING

Regional Assessment of Fair Housing

Final Report

November 15, 2017

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REGIONAL ASSESSMENT OF FAIR HOUSING

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Wyoming Fair Housing Team

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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:

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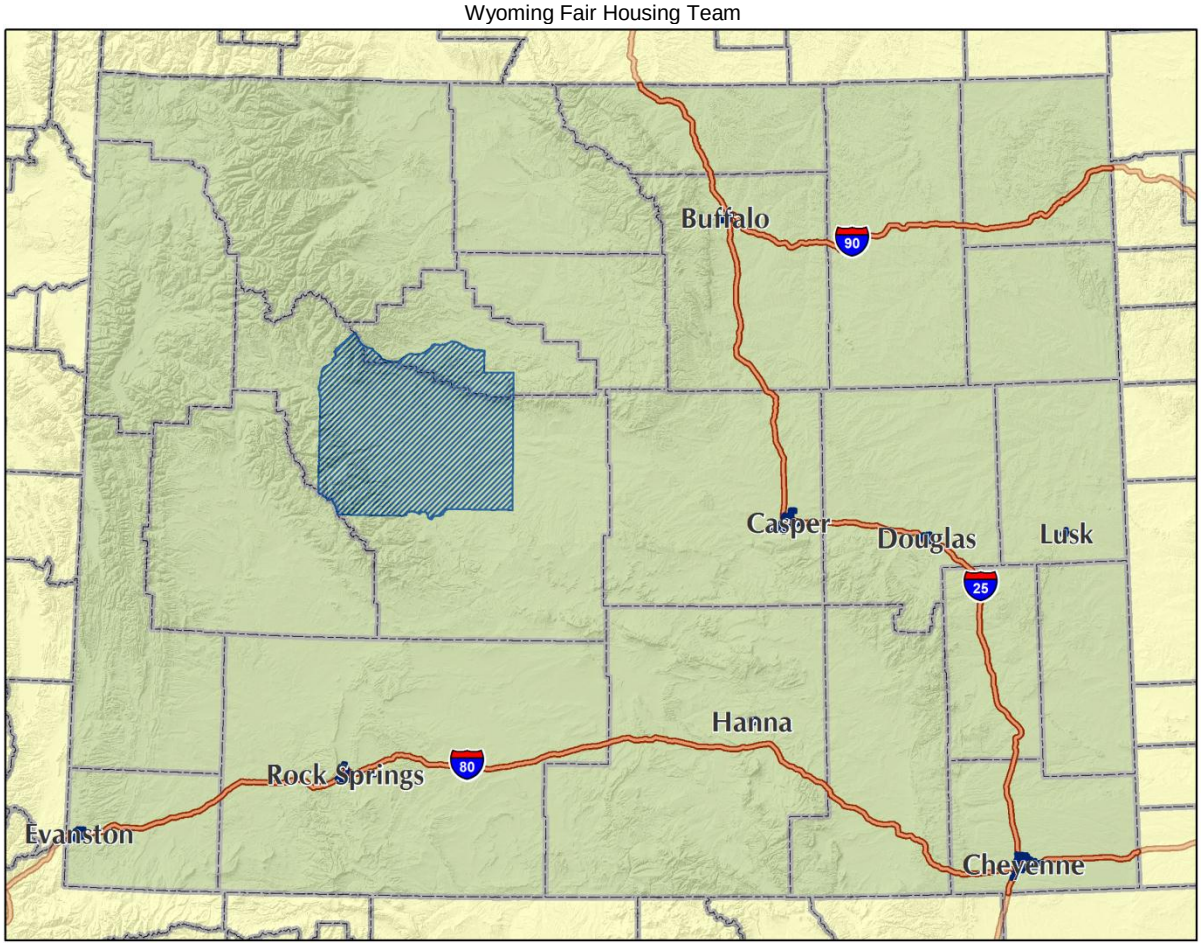
SECTION I. EXECUTIVE SUMMARY

The State of Wyoming, comprising the Wyoming Business Council, the Wyoming Community Development Authority, the Wyoming Department of Health and the Wyoming Department of Family Services, together with the cities of Casper and Cheyenne, their respective public housing authorities, and the qualified public housing authorities of Buffalo, Douglas, Evanston, Hanna, Lusk, and Rock Springs, have joined together and formed the Wyoming Fair Housing Team (the Team). The Team began this Regional Assessment of Fair Housing (AFH) in the second quarter of 2016 in order to identify fair housing issues and contributing factors and prioritize efforts to address those issues. However, by the close of the year, the State Assessment Tool had not been released. Consequently, the Team is electing to follow the "Interim Guidance for Program Participants on State of Assessment Tools and Submission Options", released on January 18, 2017. As noted in that guidance, the Team has prepared this document using the Assessment of Fair Housing framework in preparing and updating the Team's Regional Analysis of Impediments to Fair Housing Choice. The geographic locations Fair Housing Team members are presented in Map I.1 below.

Map I.1
2017 Regional Assessment of Fair Housing Study Area
The State of Wyoming
Wyoming Fair Housing Team



The decision to approach the current study through a statewide, collaborative effort was motivated by a desire for efficiency and effectiveness, as well as recognizing a need for broad collaboration and coordination among members of the Fair Housing Team on fair housing planning throughout the State.

States, counties, and local jurisdictions that receive funds from the Department of Housing and Urban Development (HUD) for housing and community development funding under the Community Development Block Grant (CDBG) program, HOME Investment Partnerships, the Emergency Solutions Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) must certify that they will affirmatively further fair housing. Affirmatively furthering fair housing requires not just preventing illegal discrimination in the housing market, but seeking to improve access to decent housing and access to opportunity for all the state's residents.

The federal Fair Housing Act prohibits discrimination in the housing market on the basis of race, color, religion, sex, national origin, disability, or familial status. The Wyoming Fair Housing Act of 2015 enshrines these same protections in state law. In its efforts to affirmatively further fair housing, the Wyoming Fair Housing Team has undertaken this Regional Assessment of Fair Housing (AFH) to determine whether and the degree to which housing choice and access to opportunity differs based on any of these characteristics protected under fair housing law.

This Regional AFH was conducted through the assessment of a number of quantitative and qualitative sources. Quantitative sources include:

- Socio-economic and housing data from the U.S. Census Bureau, such as the 2010 Census and 2010-2014 American Community Survey;
- Housing complaint data from HUD;
- Home loan application data from the Home Mortgage Disclosure Act;
- A variety of local data.

This research included the evaluation of information gathered from many public input opportunities conducted in relation to this AFH, including the 2016-2017 Fair Housing Survey, a series of fair housing forums, workshops, and presentations, the public review and related review workgroups.

Furthermore, as a result of detailed demographic, economic, and housing analysis, along with a range of activities designed to foster public involvement and feedback, the State has identified a series of fair housing issues, and factors that contribute to the creation or persistence of those issues. The issues that the Fair Housing Team has studied relate HUD's key concerns of the AFH: racially and ethnically concentrated poverty (R/ECAPs), segregation and integration of racial and ethnic minorities, disproportionate housing needs; publicly supported housing location and occupancy; disparities in access to opportunity; disability and access; and fair housing enforcement, outreach, capacity, and resources. Publicly supported housing location, disparities in access to opportunity, fair housing enforcement were the issues that most have stood out in Wyoming.

Table I.1 on the following page provides a list of the factors that have been identified as contributing to these fair housing issues, and prioritizes them according to the following two criteria:

1. High: Factors that have a direct and substantial impact on fair housing choice
2. Low: Factors that have a slight or largely indirect impact on fair housing choice, or that the Team has little capacity to address.

Table I.1
Fair Housing Contributing Factors and Priorities

Contributing Factor	Priority	Discussion
Lack of availability of affordable units in a range of sizes	High	There is a need for additional assisted housing throughout the state. Racial or ethnic minority households are more likely to be experiencing a disproportionate need due to cost burdens, incomplete plumbing or kitchen facilities, or overcrowding. This contributing factor has been assigned a medium level of priority based on the extent of the need and the state's ability to respond to this need. The ability of the state to respond to this need is limited in some cases by scarce resources and in others by high rental vacancy rates.
Economic forces (rising unemployment, declining oil and gas production, growth in rental costs)	Low	The state has seen a marked reversal in many economic indicators in the last year: Statewide, the unemployment rate stood at 5.2 percent in March of 2016, or 1.3 percentage points higher than it had been a year earlier. In some counties throughout the state, as much as 8 percent of the labor force was out of work at that time. Though the state will work to promote broader access to opportunity in the coming years, its ability to directly impact natural and global economic forces is limited.
Higher mortgage denial rates for racial and ethnic minorities	High	The ability of residents throughout the state to secure home purchase loans varies according to the race and ethnicity of the loan applicant. The overall denial rate for American Indian applicants from 2008 through 2014, at 31.4 percent, was well above the statewide average of 14.2 percent. The denial rate for Hispanic applicants, at around 21 percent, was considerably higher than the denial rate for non-Hispanic applicants (12.9 percent). This was identified in data gathered under the Home Mortgage Disclosure Act (HMDA). The state has designated efforts to address this factor to be of "high" priority.
Failure to make reasonable accommodation or modification	High	Residents and stakeholders who provided commentary during the AFH process, whether through public input sessions or the Fair Housing Survey, identified failure to make reasonable accommodation as a factor that contributes to the limited availability of accessible housing units to residents with disabilities. The State believes that it has the capacity to address this factor through outreach and education to state residents and landlords, and considers doing so to be a high priority.
Lack of access to housing for persons with disabilities	High	Residents and stakeholders who provided commentary during the AFH process, whether through public input sessions or the Fair Housing Survey, identified shortages of affordable, accessible housing to be a contributing factor to fair housing issues impacting residents with disabilities.
Lack of resources for fair housing agencies and organizations	High	The Wyoming Fair Housing Act of 2015 provides an "enforcing authority" with the power to administer and enforce the Act, but does not name a specific agency or entity as enforcing authority. As yet, no such agency has been identified. Because the ability of the state to receive HUD funding to enforce the law is contingent upon the identification of an agency for that purpose, the state is not able to access funding through the Fair Housing Assistance Program. However, the State wishes to change this.
Lack of state or local public fair housing outreach and enforcement	High	The Wyoming Fair Housing Act of 2015 provides an "enforcing authority" with the power to administer and enforce the Act, but does not name a specific agency or entity as enforcing authority. As yet, no such agency has been identified. The State considers this factor to be within its capacity to address, and that doing so will potentially give the state access to additional resources to provide fair housing outreach and enforcement.
Resistance to affordable housing production	High	This factor, identified through the feedback of stakeholders during the public input portion of the AFH process, contributes to a lack of affordable housing in the state. Lack of affordable housing restricts the fair housing choice of state residents.
Discriminatory actions in the market place	High	This factor, identified through the feedback of stakeholders during the public input portion of the AFH process, serves to limit the fair housing choice of residents with disabilities and racial/ethnic minority groups.
Lack of understanding of fair housing law	High	This factor, identified through the feedback of stakeholders during the public input portion of the AFH process, contributes to discrimination and differential treatment in the housing market. Furthermore, a lack of understanding of fair housing law means that those who may suffer discrimination in the housing market do not know where to turn when they do. The Fair Housing Team has assigned this factor a priority of “high”.

Based on these contributing factors and priorities, the Fair Housing Team has proposed a series of goals and actions designed to address fair housing issues in the state. These issues, and the goals that seek to address them, are listed in a series of tables beginning with Table I.2 on the following page, which pertains to the state as a whole. Table I.3 and Table I.4 outline fair housing goals for the cities of Casper and Cheyenne, respectively. Table I.5 through Table I.12 present fair housing issues and goals pertinent to the service areas of Public Housing authorities in Casper, Cheyenne, Buffalo, Douglas, Evanston, Hanna, Lusk, and Rock Springs.

Table I.2

The State of Wyoming
2017 Assessment of Fair Housing

Fair Housing Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant
Promote Development of Affordable Housing Units in the State	Availability of Affordable Units in a Range of Sizes	Disproportionate Housing Needs	Identify opportunities for affordable housing developments; construct or rehab 125 such units over this next five year	Wyoming Community Development Authority (WCDA) and Wyoming Business Council (WBC)
	Economic forces (rising unemployment, declining oil and gas production, historical growth in rental costs)	Publicly supported housing location and occupancy.	Establish a policy to reach out to landlords, particularly in areas with high rental vacancy rates, and encourage them to participate in the housing choice voucher program.	Wyoming Department of Family Services (DFS)
	Resistance to affordable housing NIMBY is a concern			Wyoming Department of Health (WDH)
Discussion: The incidence of housing problems in the State of Wyoming differs according to the race and ethnicity of the head of household. While a quarter of households in the state experienced some form of housing problem in 2008-2012, more than a third of black, Asian or Pacific Islander, and Native American households were experiencing a housing problem during that time period. The same was true of Hispanic households, along with large family and non-family households. While there is a considerable need for affordable housing, high rental vacancy rates in much of the state make it difficult to site affordable housing units in those areas.				
Promote equitable access to credit and home lending	Access to financial services.	Disparities in Access to Opportunity	Reduce disparities in home lending application outcomes through annual credit education and outreach.	WCDA, WBC, DFS, and WDH
Discussion: Denial rates for owner-occupied home-purchase loan applications differed according to the race and ethnicity of the applicant. Denial rates for American Indian applicants, at 31.4 percent, were well above the statewide average of 14.2 percent. Similarly, around 21 percent of applications from Hispanic applicants were denied, compared to a denial rate of 12.9 percent for non-Hispanic applicants. These discrepancies persisted even when income was taken into account.				
Increase the supply of housing units accessible to residents with disabilities.	Failure to make reasonable accommodation or modification	Disparities in Access to Opportunity	Ensure compliance with ADA and FHA accessibility requirements in newly constructed publicly assisted housing on an ongoing basis through inspections.	WCDA, WBC, DFS, and WDH
	Access to publicly supported housing for persons with disabilities		Provide outreach and education to landlords and housing providers relating to the requirements of the ADA and FHA concerning accessibility annually	
Discussion: Based on feedback provided by stakeholders and members of the public during the 2016 AFH process, residents with disabilities face limitations in the supply of affordable, accessible housing. Though residents with disabilities are generally well-represented among households living in public-assisted units, there remains a need for additional housing suitable for residents with disabilities. In addition, based on the relatively high number of complaints from residents with disabilities and additional feedback received during the public review process, there is a need to ensure that landlords and property managers throughout the state respond appropriately to requests for reasonable accommodation or modification.				
Designate an agency to serve as the enforcing authority for the Wyoming Fair Housing Act.	Lack of resources for fair housing agencies and organizations	Disparities in Access to Opportunity	In year one, identify a state agency to serve as enforcing authority for the Wyoming Fair Housing Act.	WCDA, WBC, DFS, and WDH
	Lack of State or local private fair housing outreach and enforcement		Encourage/direct the designated enforcing agency to apply for funding under the Fair Housing Assistance Program (FHAP) to support its fair housing efforts. Provide resources to the enforcing authority so that it may initiate fair housing testing.	WCDA, WBC, DFS, and WDH

Discussion: The passage of the Wyoming Fair Housing Act in 2015 was a positive step toward ensuring that state residents have access to fair housing choice and providing recourse under state law for those who believe that they have experienced unlawful discrimination in the housing market. However, the Act does not identify a specific state agency as enforcing authority, which leaves a substantial gap in the state's fair housing infrastructure.				
Reduce Discrimination in Rental Market	Lack of understanding of fair housing law Discriminatory actions in the marketplace	Disparities in Access to Opportunity Disparities in Access to Opportunity	Provide outreach and education on a yearly basis. Provide fair housing seminars at annual conferences (e.g., WyoNAHRO) Provide an opportunity for remote/web-based participation in all fair housing events	WCDA, WBC, DFS, and WDH
Discussion: This fair housing goal was identified in the previous statewide analysis of impediments to fair housing choice, and has been included in an ongoing effort to address housing discrimination in the rental housing market.				
Reduce NIMBYism and restrictive building codes and practices in rural areas of Wyoming	Lack of understanding of fair housing law Resistance to affordable housing	Disparities in Access to Opportunity Disparities in Access to Opportunity	Provide outreach and education on a yearly basis. Provide fair housing seminars or presentations, such as at annual conferences (e.g., WyoNAHRO) Provide an opportunity for remote/web-based participation in all fair housing events	WCDA, WBC, DFS, and WDH
Discussion: This fair housing goal was identified in the previous statewide analysis of impediments to fair housing choice, and has been included in an ongoing effort to address restrictive policies regarding regarding accessible/affordable housing.				

Table I.3
The City of Casper
2017 Assessment of Fair Housing

Fair Housing Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant
Promote Development of Affordable Housing Units in the City	Availability of Affordable Units in a Range of Sizes Economic forces (rising unemployment, declining oil and gas production, historical growth in rental costs) Resistance to affordable housing NIMBY is a concern	Disproportionate Housing Needs Publicly supported housing location and occupancy.	Identify opportunities for affordable housing developments; construct or rehab 25 such units over this next five year Establish a policy to reach out to landlords, particularly in areas with high rental vacancy rates, and encourage them to participate in the housing choice voucher program.	The City of Casper
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Promote equitable access to credit and home lending	Access to financial services.	Disparities in Access to Opportunity	Reduce disparities in home lending application outcomes through participating in annual credit education and outreach.	The City of Casper
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Increase the supply of housing units accessible to residents with disabilities.	Failure to make reasonable accommodation or modification Access to publicly supported housing for persons with disabilities	Disparities in Access to Opportunity	Ensure compliance with ADA and FHA accessibility requirements in newly constructed publicly assisted housing on an ongoing basis through inspections. Provide outreach and education to landlords and housing providers relating to the requirements of the ADA and FHA concerning accessibility	The City of Casper
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Reduce Discrimination in Rental Market	Lack of understanding of fair housing law Discriminatory actions in the marketplace	Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The City of Casper
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Reduce NIMBYism and restrictive building codes and practices	Lack of understanding of fair housing law Resistance to affordable housing	Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The City of Casper

Table I.4
The City of Cheyenne
2017 Assessment of Fair Housing

Fair Housing Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant
Promote Development of Affordable Housing Units in the City	Availability of Affordable Units in a Range of Sizes Economic forces (rising unemployment, declining oil and gas production, historical growth in rental costs) Resistance to affordable housing NIMBY is a concern	Disproportionate Housing Needs Publicly supported housing location and occupancy.	Identify opportunities for affordable housing developments; construct or rehab 25 such units over this next five year Establish a policy to reach out to landlords, particularly in areas with high rental vacancy rates, and encourage them to participate in the housing choice voucher program.	The City of Cheyenne
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Promote equitable access to credit and home lending	Access to financial services.	Disparities in Access to Opportunity	Reduce disparities in home lending application outcomes through participating in annual credit education and outreach.	The City of Cheyenne
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Increase the supply of housing units accessible to residents with disabilities.	Failure to make reasonable accommodation or modification Access to publicly supported housing for persons with disabilities	Disparities in Access to Opportunity	Ensure compliance with ADA and FHA accessibility requirements in newly constructed publicly assisted housing on an ongoing basis through inspections Provide outreach and education to landlords and housing providers relating to the requirements of the ADA and FHA concerning accessibility annually	The City of Cheyenne
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Reduce Discrimination in Rental Market	Lack of understanding of fair housing law Discriminatory actions in the marketplace	Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The City of Cheyenne
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Reduce NIMBYism and restrictive building codes and practices	Lack of understanding of fair housing law Resistance to affordable housing	Disparities in Access to Opportunity Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The City of Cheyenne

Table I.5
Casper Housing Authority
2017 Assessment of Fair Housing

Fair Housing Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant
Promote Development of Affordable Housing Units in the Service Area	Economic forces (rising unemployment, declining oil and gas production, historical growth in rental costs) Resistance to affordable housing NIMBY is a concern	Publicly supported housing location and occupancy.	Reach out to landlords, particularly in areas with high rental vacancy rates, and encourage them to participate in the housing choice voucher program.	The Casper Housing Authority
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Increase the supply of housing units accessible to residents with disabilities.	Failure to make reasonable accommodation or modification Access to publicly supported housing for persons with disabilities	Disparities in Access to Opportunity	Ensure compliance with ADA and FHA accessibility requirements in newly constructed publicly assisted housing on an ongoing basis through inspections Provide outreach and education to landlords and housing providers relating to the requirements of the ADA and FHA concerning accessibility annually	The Casper Housing Authority
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Reduce Discrimination in Rental Market	Lack of understanding of fair housing law Discriminatory actions in the marketplace	Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The Casper Housing Authority
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Reduce NIMBYism and restrictive building codes and practices	Lack of understanding of fair housing law Resistance to affordable housing	Disparities in Access to Opportunity Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The Casper Housing Authority

Table I.6
Cheyenne Housing Authority
2017 Assessment of Fair Housing

Fair Housing Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant
Promote Development of Affordable Housing Units in the Service Area	Economic forces (rising unemployment, declining oil and gas production, historical growth in rental costs) Resistance to affordable housing NIMBY is a concern	Publicly supported housing location and occupancy.	Reach out to landlords, particularly in areas with high rental vacancy rates, and encourage them to participate in the housing choice voucher program.	
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Increase the supply of housing units accessible to residents with disabilities.	Failure to make reasonable accommodation or modification Access to publicly supported housing for persons with disabilities	Disparities in Access to Opportunity	Ensure compliance with ADA and FHA accessibility requirements in newly constructed publicly assisted housing on an ongoing basis. Through inspections Provide outreach and education to landlords and housing providers relating to the requirements of the ADA and FHA concerning accessibility annually	The Cheyenne Housing Authority
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Reduce Discrimination in Rental Market	Lack of understanding of fair housing law Discriminatory actions in the marketplace	Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The Cheyenne Housing Authority
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Reduce NIMBYism and restrictive building codes and practices	Lack of understanding of fair housing law Resistance to affordable housing	Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The Cheyenne Housing Authority

Table I.7
Buffalo Housing Authority
2017 Assessment of Fair Housing

Fair Housing Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant
Reduce Discrimination in Rental Market	Lack of understanding of fair housing law Discriminatory actions in the marketplace	Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The Buffalo Housing Authority
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Reduce NIMBYism and restrictive building codes and practices	Lack of understanding of fair housing law Resistance to affordable housing	Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The Buffalo Housing Authority

Table I.8
Douglas Housing Authority
2017 Assessment of Fair Housing

Fair Housing Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant
Reduce Discrimination in Rental Market	Lack of understanding of fair housing law Discriminatory actions in the marketplace	Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The Douglas Housing Authority
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Reduce NIMBYism and restrictive building codes and practices	Lack of understanding of fair housing law Resistance to affordable housing	Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The Douglas Housing Authority

Table I.9
Evanston Housing Authority
2017 Assessment of Fair Housing

Fair Housing Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant
Increase the supply of housing units accessible to residents with disabilities.	Failure to make reasonable accommodation or modification Access to publicly supported housing for persons with disabilities	Disparities in Access to Opportunity	Ensure compliance with ADA and FHA accessibility requirements in newly constructed publicly assisted housing on an ongoing basis through inspections Provide outreach and education to landlords and housing providers relating to the requirements of the ADA and FHA concerning accessibility annually	The Evanston Housing Authority
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Reduce Discrimination in Rental Market	Lack of understanding of fair housing law Discriminatory actions in the marketplace	Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The Evanston Housing Authority
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Reduce NIMBYism and restrictive building codes and practices	Lack of understanding of fair housing law Resistance to affordable housing	Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The Evanston Housing Authority

Table I.10
Hanna Housing Authority
2017 Assessment of Fair Housing

Fair Housing Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant
Reduce Discrimination in Rental Market	Lack of understanding of fair housing law Discriminatory actions in the marketplace	Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The Hanna Housing Authority
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Reduce NIMBYism and restrictive building codes and practices	Lack of understanding of fair housing law Resistance to affordable housing	Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The Hanna Housing Authority

Table I.11
Lusk Housing Authority
2017 Assessment of Fair Housing

Fair Housing Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant
Reduce Discrimination in Rental Market	Lack of understanding of fair housing law Discriminatory actions in the marketplace	Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The Lusk Housing Authority
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Reduce NIMBYism and restrictive building codes and practices	Lack of understanding of fair housing law Resistance to affordable housing	Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The Lusk Housing Authority

Table I.12
Rock Springs Housing Authority
2017 Assessment of Fair Housing

Fair Housing Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant
Increase the supply of housing units accessible to residents with disabilities.	Failure to make reasonable accommodation or modification Access to publicly supported housing for persons with disabilities	Disparities in Access to Opportunity	Ensure compliance with ADA and FHA accessibility requirements in newly constructed publicly assisted housing on an ongoing basis through inspections Provide outreach and education to landlords and housing providers relating to the requirements of the ADA and FHA concerning accessibility annually	The Rock Springs Housing Authority
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Reduce Discrimination in Rental Market	Lack of understanding of fair housing law Discriminatory actions in the marketplace	Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The Rock Springs Housing Authority
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Reduce NIMBYism and restrictive building codes and practices	Lack of understanding of fair housing law Resistance to affordable housing	Disparities in Access to Opportunity Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The Rock Springs Housing Authority

SECTION II. COMMUNITY PARTICIPATION PROCESS

The Wyoming Fair Housing promoted community participation during the AFH process through five main avenues: the 2016 Wyoming Fair Housing Survey; a series of in-person meetings with the residents and managers of public housing agencies in Evanston, Rock Springs, Hanna, Cheyenne, Douglas, Lusk, Casper, and Buffalo; surveys distributed to residents of those housing authorities; in-person and web-based workgroups pertaining to disability and access to opportunity; and a series of five fair housing forum presentations held in Cheyenne, Laramie, Casper, Gillette, and Cody.

The WCDA will post documentation of the AFH on its website in an effort to reach the broadest possible audience. WCDA will also issue a press release once the draft will be released, which will be syndicated statewide through various news and media outlets. These outlets will be listed at a later date once they have been contacted. The Eastern Shoshone and Northern Arapaho tribes living on the Wind River Reservation have also been notified to ensure input from typically underrepresented audiences.

As part of the community participation process, program participants will be reaching out to groups such as Protection & Advocacy System, Inc., a disability protection and advocacy group based in Cheyenne. Additional advocacy groups to be contacted include the Hispanic Organization for Progress and Education and the Wind River Native Advocacy Center.

THE 2016 WYOMING FAIR HOUSING SURVEY

The 2016 Wyoming Fair Housing Survey was opened on July 18, 2016 and remained open through the conclusion of the AFH public review process. The purpose of the survey, which received 336 responses, was to gain the insight of stakeholders and citizens throughout the state on fair housing issues and challenges facing state residents.

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 the issue was nonexistent, but rather that there was no widespread perception of its prevalence, as gauged by survey participants.

As shown in Table II.1 at right, the largest group of respondents to the 2016 State of Wyoming Fair Housing survey consisted local government officials, who accounted for around 30 percent of respondents. Twenty-six respondents were service providers, twenty-one were advocates/service providers, and fifty- were in property management.

Table II.1
Role of Respondent
State of Wyoming
2016 Fair Housing Survey Data

Primary Role	Total
Local Government	95
Other Role	75
Property Management	53
Service Provider	26
Advocate/Service Provider	21
Real Estate	21
Construction/Development	15
Banking/Finance	13
Missing	10
Law/Legal Services	6
Appraisal	1
Homeowner	0
Insurance	0
Renter/Tenant	0
Total	**336**

Most respondents considered themselves to be at least somewhat familiar with fair housing laws, as shown in Table II.2 at right. Seventy-six respondents considered themselves to be very familiar with such laws, roughly twenty-three percent of those who responded.

Table II.2
How Familiar are you with Fair Housing Laws?
State of Wyoming
2016 Fair Housing Survey Data

Familiarity	Total
Not Familiar	60
Somewhat Familiar	113
Very Familiar	76
Missing	87
Total	**336**

One hundred ninety-four respondents agreed that fair housing laws serve a useful purpose, or around fifty-eight percent of those who answered the question, as shown in Table II.3 below. Seventy-six respondents felt that these laws are difficult to understand or follow, and a slightly lower number responded to this question with "don't know."

Table II.3
Federal, State, and Local Fair Housing Laws
State of Wyoming
2016 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Do you think fair housing laws are useful?	194	15	37	90	336
Are fair housing laws difficult to understand or follow?	76	108	62	90	336
Do you think fair housing laws should be changed?	42	108	92	94	336
Do you thing fair housing laws are adequately enforced?	104	109	17	106	336

One hundred four respondents were aware of a training process that was available to learn about fair housing laws, as shown in Table II.4 below; eighty-four respondents had participated in such training. Only around twelve percent of respondents were aware of any fair housing testing in the state or in their areas. When asked to weigh in on the current levels of testing, a small percentage of those who answered considered those levels to be insufficient.

Table II.4
Fair Housing Activities
State of Wyoming
2016 Fair Housing Survey Data

Question		Yes	No	Don't Know	Missing	Total
Is there a training process available to learn about fair housing laws?		104	109	17	106	336
Have you participated in fair housing training?		84	49	3	200	336
Are you aware of any fair housing testing?		41	133	56	106	336
Testing and education	**Too Little**	**Right Amount**	**Too Much**	**Don't Know**	**Missing**	**Total**
Is there sufficient outreach and education activity?	74	70	3	81	108	336
Is there sufficient testing?	40	40	4	143	109	336

As part of an effort to assess the level of fair housing knowledge among stakeholders and residents who took the test, the survey included a question asking respondents to list as many groups as they could that were protected under federal, state, or local fair housing laws (race and disability were included in the question prompt). Two hundred thirty-seven survey takers responded to this question, and as shown in Table II.5 on the following page, one hundred fifteen respondents correctly identified religion and gender. Roughly 35 percent correctly identified family status. A large number of responses also correctly identified the remaining protected classes: national origin and color.

Table II.5
Protected Classes
State of Wyoming
2016 Fair Housing Survey Data

Protected Class	Total
Gender	115
Religion	115
Family Status	83
National Origin	65
Age	62
Color	50
Sexual Orientation	47
Other	46
Income	21
Disability	14
Race	7
Criminal History	7
Ethnicity	6
Military	4
AIDS	1
Total	**237**

Only twenty respondents were aware of a fair housing ordinance, regulation, or plan in their jurisdiction, as shown in Table II.6 below. Eleven respondents were aware of specific areas with fair housing problems.

Table II.6
Local Fair Housing
State of Wyoming
2016 Fair Housing Survey Data

Question	Yes	No	Don't Know	Missing	Total
Are you aware of any city or county fair housing ordinance, regulation, or plan?	20	119	52	145	336
Are there any specific geographic areas that have fair housing problems?	11	97	82	146	336

Written comments from those who took the fair housing survey are included in Technical Appendix Section G. Those comments are referenced throughout the report where they reveal fair housing issues or contributing factors.

Barriers to Fair Housing Choice in the Private Sector

This section addressed fair housing in the private housing sector and offered a series of two-part questions. The first part asked respondents 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:

1) Rental housing market,
2) Real estate industry,
3) Mortgage and home lending industries,
4) Housing construction or accessible housing design fields,
5) Home insurance industry,
6) Home appraisal industry, and
7) 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, substandard rental housing, occupancy rules, and other fair housing issues in the private housing sector. Responses to questions from this section of the survey are presented in Table II.7 below. Outside of the rental housing market, fewer than five percent of those who responded to each question were aware of fair housing issues in the private sector areas mentioned.

Table II.7
Barriers to Fair Housing in the Private Sector
State of Wyoming
2016 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?	32	131	59	114	336
The real estate industry?	6	127	88	115	336
The mortgage and home lending industry?	6	117	97	116	336
The housing construction or accessible housing design fields?	17	116	86	117	336
The home insurance industry?	1	115	104	116	336
The home appraisal industry?	4	117	98	117	336
Any other housing services?	4	106	107	119	336

Fair Housing in the Public Sector

Just as in the section of the survey concerning private sector barriers, respondents were asked to offer insight into their awareness of questionable practices or barriers to fair housing in the public sector. A list of areas within the public sector was provided, and respondents were asked first to specify their awareness of fair housing issues within each area. If they were aware of any fair housing issues, they were asked to further describe these issues in a narrative fashion. Respondents were asked to identify fair housing issues within the following public sector areas related to housing:

1) Land use policies,
2) Zoning laws,
3) Occupancy standards or health and safety codes,
4) Property tax policies,
5) Permitting processes,
6) Housing construction standards,
7) Neighborhood or community development policies, and
8) Any other public administrative actions or regulations.

The questions in this section were used to identify fair housing issues regarding zoning, building codes, accessibility compliance, subdivision regulations, displacement issues, development practices, residency requirements, property tax policies, land use policies, and NIMBYism, or a "not in my backyard" mentality. Responses to these questions are presented in Table II.8 on the following page. As shown, awareness of fair housing issues in the public sector was relatively low among respondents to the 2016 Fair Housing Survey. However, of those who responded to a question that asked them to assess the level of access to government services, more than eight percent stated that they were aware of fair housing issues in this area.

Table II.8
Barriers to Fair Housing in the Public Sector
State of Wyoming
2016 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:					
Land use policies?	21	133	50	132	336
Zoning laws?	24	123	57	132	336
Occupancy standards or health and safety codes?	15	129	60	132	336
Property tax policies?	11	118	75	132	336
Permitting process?	10	118	76	132	336
Housing construction standards?	9	122	73	132	336
Neighborhood or community development policies?	13	122	67	134	336
Limited access to government services, such as employment services?	29	127	46	134	336
Public administrative actions or regulations?	10	107	82	137	336

Public Housing Agency Meetings

From July 11 to July 14, 2016 representatives of the Wyoming Fair Housing Team held a series of meetings with members of the Residents Advisory Boards of two public housing agencies (PHAs) and six qualified public housing agencies (QPHAs). The PHAs were located in Cheyenne and Casper, and the QPHAs were located in Evanston, Rock Springs, Hanna, Douglas, Lusk, and Buffalo. The exact dates, times, and locations of each meeting are presented in Table II.9 below.

Table II.9
PHA and Focus Group Meetings
2016 Wyoming Assessment of Fair Housing
Dates, Times, and Locations

Date	City	Event	Time	Location
July 11	Evanston	QPHA Meeting	12:00 - 1:00 PM	155 Apache Dr. Suite A
July 11	Rock Springs	QPHA Meeting	3:30 - 4:30 PM	Rock Springs PHA, 233 'C' St, Conference Room
July 12	Hanna	QPHA Meeting	9:00 - 10:00 AM	Hanna Housing Community Room
July 12	Cheyenne	PHA Meeting	1:00 - 2:00 PM	CHA Office, 3304 Sheridan Street, Cheyenne, WY 82009
July 12	Douglas	QPHA Meeting	5:00 - 6:00 PM	120 S. Fifth, Douglas, WY
July 13	Lusk	QPHA Meeting	9:00 - 10:00 AM	At PHA building
July 13	Casper	PHA Meeting	1:00 - 2:00 PM	145 N. Durbin, Casper
July 14	Buffalo	QPHA Meeting	9:00 - 10:00 AM	Clear Creek Apartments, 351 S. Cedar Street, Buffalo, WY, 82834

The following is a brief summary of each meeting, presented in the order in which the meetings occurred:

Evanston

The Evanston QPHA meeting was held at the offices of the Evanston Housing Authority on July 11, 2016 at 12:00 PM. The sole attendee was a member of the PHA's board of directors.

Rock Springs

The Rock Springs QPHA meeting was held in the offices of the Rock Springs Housing Authority on July 11, 2016 at 3:30 PM. In attendance were housing authority administrators and approximately 10 residents.

Hanna

The Hanna QPHA meeting was held in the offices of the Hanna Housing Authority on July 12, 2016 at 9:00 AM. While there were no residents in attendance, the meeting consisted of a brief consultation and discussion with the Executive Director of the housing authority as it relates to fair housing.

Cheyenne

The Cheyenne PHA meeting was held at the headquarters of the Cheyenne Housing Authority on July 12, 2016 at 1:00 PM. In attendance were administrators of the housing authority and approximately 30 residents. The PHA administrators had arranged for transportation for those residents who were interested in attending, including those with disabilities.

Douglas

The Douglas PHA meeting was held at the headquarters of the Douglas Housing Authority on July 12, 2016 at 5:00 PM. In attendance were a housing authority administrator and approximately 25 residents.

Lusk

The Lusk PHA meeting was held at the offices of the Lusk Housing Authority on July 13, 2016 at 9:00 AM. The sole attendee was a housing authority administrator, and the meeting included a brief consultation and discussion with that administrator.

Casper

The Casper PHA meeting was held at the headquarters of the Casper Housing Authority on July 13, 2016 at 1:00 PM. In attendance were housing authority officials and approximately 20 residents.

Buffalo

The Buffalo PHA meeting was held at the Buffalo Housing Authority on July 14, 2016 at 9:00 AM. In attendance were housing authority officials and approximately 15 residents.

Access to Opportunity Workgroup Meetings

The Access to Opportunity Workgroup was originally conceived as a focus group discussion, scheduled to take place at the headquarters of the Wyoming Community Development Authority on July 14, 2016 at 1:00 PM. To expand participation, another set of meetings were held via webinar with a select group of participants.

The first discussion took place on July 25, 2016, and focused on the HUD-provided opportunity indices and their applicability to the State of Wyoming. Attendees did not feel that

the indices would prove useful, either in the identification of fair housing issues in the state or in the identification of housing or economic issues more generally.

The second Access to Opportunity Workgroup discussion was held on August 1, 2016. This discussion featured a review of the opportunity indices provided by HUD as well as an overview of up-to-date economic and housing data from the Bureau of Economic Analysis, the Bureau of Labor Statistics, and data that the Wyoming Community Development Authority collects semi-annually through its Rental Vacancy Survey. Recorded transcripts of each public input meeting are included in Technical Appendix Section E. A summary of those meetings is presented below.

Disability and Access Workgroup Meetings

Like the Access to Opportunity Workgroup meeting, the Disability and Access Workgroup was originally presented as a focus group presentation at the WCDA headquarters on July 13, 2016 at 2:30 PM. To facilitate additional participation, the team held a second meeting as a webinar discussion, so that residents and stakeholders could attend regardless of where they were located.

The Disability and Access Workgroup was held on August 2, 2016, once again by webinar. This session was well-attended, with participants offering valuable insights into the challenges facing the community of persons with disabilities. Included among attendees was the Executive Director of the Wyoming Institute for Disabilities. The discussion focused on demographic and economic data relating to the population with disabilities, as well as attendees' knowledge of the challenges that this community faces. Recorded transcripts are included in Technical Appendix Section E.

Fair Housing Forum Presentations

A series of Fair Housing Forum presentations were held in Cheyenne, Laramie, Casper, Gillette, and Cody from August 15 through August 17, 2016. The exact dates, times, and locations of each meeting is presented in Table III.2 below. The purpose of these meetings was to introduce residents and stakeholders to the new AFFH rule and the assessment of fair housing, to provide a discussion of preliminary results from that assessment, and to provide attendees an opportunity to provide input on fair housing issues of which they were aware.

The first meeting was held on August 15, 2016 at the Cheyenne City Council Chambers at 10:00 AM. The second meeting was held in Laramie at 3:00 PM meeting at the Albany County Public Library. An 8:00 meeting at the Casper City Hall the following day (August 16, 2016) was also unattended, as was a meeting held at the Campbell County Public Library that same day at 3:00 PM. The following morning, an 8:00 AM meeting was held at the Pinnacle Bank in Cody.

The following agencies or organizations were invited to participate in the community input process:

Brain Injury Alliance of Wyoming
Wyoming Department of Health
Wyoming Department of Health - Aging Division
Wyoming Department of Health - Behavioral Health Division
Wyoming Department of Health - Healthcare Financing Division
Wyoming Department of Health - Public Health Division
Governor's Planning Council on Developmental Disabilities
UPLIFT
Wyoming Independent Living Rehabilitation
Wyoming Institute for Disabilities
Ark Regional Services
Mountain Regional Services
Mountain Regional Services
Big Horn Enterprises
NOWCAP Services - Casper Program
NOWCAP Services - Cody Program
NOWCAP Services - Rock Springs Program
Community Entry Services - Riverton HQ
Community Entry Services - Lander Office
Community Entry Services - Jackson Office
Community Entry Services - Casper Office
Rehabilitation Enterprises of NorthEastern Wyoming - Sheridan
Rehabilitation Enterprises of NorthEastern Wyoming - Newcastle
Diversified Services, Inc.
Magic City Enterprises, dba Cheyenne Professional Rehabilitation Services
Wyoming Community Service Providers
Lincoln Self-Reliance - Afton HQ
Lincoln Self-Reliance - Diamondville Office
Easter Seals Wyoming
Love, Care, and Dignity
AARP in Wyoming
Alzheimer's Association - Wyoming Chapter
Wyoming Parent Training and Information Center
Wyoming Diagnostic Clinic
Wyoming Speech Language and Hearing Association
Wyoming Insurance Department
Wyoming Department of Family Services
Wyoming Senior Citizens Inc. - Riverton
Wyoming Senior Citizens Inc. - Casper
Wyoming Senior Citizens Inc. - Cheyenne
National Alliance on Mental Illness Wyoming
Wyoming Military Department
Wyoming Department of Workforce Services: Vocational Rehabilitation - Casper Field Office
Wyoming Department of Workforce Services: Vocational Rehabilitation - Cheyenne Field Office
Wyoming Department of Workforce Services: Vocational Rehabilitation - Cheyenne Main Office

Wyoming Department of Workforce Services: Vocational Rehabilitation - Disability Determination Services
Wyoming Department of Workforce Services: Vocational Rehabilitation - Evanston Field Office
Wyoming Department of Workforce Services: Vocational Rehabilitation - Gillette Field Office
Wyoming Department of Workforce Services: Vocational Rehabilitation - Jackson Field Office
Wyoming Department of Workforce Services: Vocational Rehabilitation - Kemmerer Field Office
Wyoming Department of Workforce Services: Vocational Rehabilitation - Lander Field Office
Wyoming Department of Workforce Services: Vocational Rehabilitation - Laramie Field Office
Wyoming Department of Workforce Services: Vocational Rehabilitation - Rawlins Field Office
Wyoming Department of Workforce Services: Vocational Rehabilitation - Riverton Field Office
Wyoming Department of Workforce Services: Vocational Rehabilitation - Rock Springs Field Office
Wyoming Department of Workforce Services: Vocational Rehabilitation - Sheridan Field Office
Wyoming Department of Workforce Services: Vocational Rehabilitation - Torrington Field Office
Wyoming Department of Workforce Services: Vocational Rehabilitation - Worland Field Office
Wyoming Protection and Advocacy System
Wyoming Down Syndrome Association
Wyoming Department of Education - Special Education Department

The Wyoming Fair Housing Team achieved mixed degrees of success in eliciting meaningful community participation, which varied by outreach method and location. Generally, meetings held at the public housing agencies, particularly those serving areas with larger populations, were successful. In addition, focus group discussions concerning Opportunity and Disability and Access initially attracted low participation, but subsequent efforts to explore these subjects in a web-based, workgroup format were more successful.

In some cases, residents and stakeholders who did participate failed to see the relevance of the fair housing information to their personal situations.

Comments submitted during the public participation process focused upon the applicability of HUD-provided data and indices to the State of Wyoming, economic challenges stemming from a recent downturn in the state economy, challenges in the housing market, and potential barriers facing the population with disabilities. All comments were accepted and were taken into account during the development of the 2017 Assessment of Fair Housing (AFH). For example, the prevailing view among participants that the HUD-provided indices were outdated, unreliable, and not useful prompted the inclusion of local data that better captured the experience of Wyoming households in the current economy.

In addition, the Disability and Access Work Group discussion revealed or underscored general issues relating to the population with disabilities and the ability of this population to secure affordable, accessible housing. These comments, and additional analyses that these comments prompted, constituted a substantial portion of the “local data” employed in Section V. There were no comments that were not accepted.

Assessment of Fair Housing Final Presentations

A series of five Assessment of Fair Housing Final Presentations were held in five communities in the state: Casper, Cheyenne, Rock Springs, Jackson, and Gillette over October 2 through 4, 2017. Significant public notifications were conducted and mass advertising was place on the WCDA website and in daily newspapers. The purpose of these meetings was to report to citizens of the State of Wyoming, each of the two entitlements, as well as the eight housing authorities the findings of the AFH process. No comments were received.

SECTION III. ASSESSMENT OF PAST GOALS AND ACTIONS

THE CITY OF CASPER

The City of Casper completed and published its most recent Analysis of Impediments to Fair Housing Choice (AI) on November 20, 2012. Based on a review of conditions in the state's private housing market, that analysis identified a series of impediments to fair housing choice, along with recommended actions to address those impediments:

Private Sector Impediments, Actions, and Measurable Objectives

***Impediment 1*: Discriminatory refusal to rent or negotiate for rental.** Evidence of this impediment was seen in the review of complaints filed with HUD; it was the most common type of complaint processed by that agency from 2005 to 2010, most often based on familial status discrimination.

Action 1.1: Work with other agencies, such as the Wyoming Community Development Authority (WCDA) or Wyoming Business Council (WBC) to research need for testing and enforcement activities
Measurable Objective 1.1: If found to be necessary, increase number of testing and enforcement activities conducted

Action 1.2: Educate landlords and property management companies about fair housing law
Measurable Objective 1.2: Increase number of outreach and education activities conducted
Action 1.3: Educate housing consumers in fair housing rights
Measurable Objective 1.3: Increase number of outreach and education activities conducted

***Impediment 2*: Discriminatory patterns in home purchase loan denials.** Evidence of this impediment was seen in the HMDA data, which indicated higher denial rates among black, American Indian, and Hispanic applicants, even when correcting for income, as well as higher denial rates for women applicants.

Action 2.1: Educate buyers through credit counseling and home purchase training
Measurable Objective 2.1: Increase number of outreach and education activities conducted

***Impediment 3*: Discriminatory patterns in predatory lending.** Evidence of this impediment was seen in the HMDA data, which showed higher rates of subprime loans among American Indian, Hispanic, and black applicants.

Action 3.1: Educate buyers through credit counseling and home purchase training
Measurable Objective 3.1: Increase number of outreach and education activities conducted

Public Sector Impediments, Actions, and Measurable Objectives

***Impediment 1*: Lack statewide fair housing law.** No state laws offer additional protections against housing discrimination in Wyoming and no state agencies offer fair housing services or activities, as seen in the review of the fair housing structure.

Action 1.1: Work with other agencies, such as the WCDA or WBC to identify and evaluate reasons for failure of previous attempts to create Wyoming Fair Housing Act
Measurable Objective 1.1: Increase number of reasons identified and evaluated

***Impediment 2*: Limited access to fair housing services due to lack of state or local fair housing entity.** Evidence of this impediment was seen in respondents' answers to the 2011 Wyoming Fair Housing Survey and feedback received at the Fair Housing Forum.

Action 2.1: Evaluate current fair housing outreach and education efforts and identify improvements to make them more effective
Measurable Objective 2.1: Increase number of improvements identified and addressed

In its 2013 and 2014 Consolidated Annual Plan Evaluation Reports (CAPERs), the City summarizes the activities that it has undertaken to address these impediments. To address the limited access to fair housing services identified as Public Sector Impediment 2, the City has been referring those with fair housing complaints to HUD's Wyoming Field Office.

The City has also promoted fair housing outreach and education through its Code Enforcement Division. These efforts, targeting both landlords and rental tenants in the city, are designed to address the discriminatory refusal to rent identified as Private Sector Impediment 1. In addition, the City has undertaken to incorporate an outreach and education strategy in future fair housing planning.

In addition, the City has focused on addressing weaknesses identified in the 2012 AI. It has instituted procedures, in partnership with its housing partners, to record beneficiary data, housing stock prices and unit sizes, and community impact to fair housing. The city has also explored methods to gather more up-to-date and targeted primary data, e.g., by incorporating a Fair Housing survey into the city's public participation process.

Since the 2012 AI, the city has had some success in reaching out to renters and landlords, and will continue to promote outreach and education as a means to make residents aware of their rights and responsibilities under fair housing law. In addition, the 2015 passage of the Wyoming Fair Housing Act successfully addressed Public Sector Impediment 2, which related specifically to the lack of such a law.

On the other hand, owing to a lack of resources to operate a fair housing office, the efforts of the city to provide fair housing services to its residents have largely been confined to the referral of fair housing complaints to a HUD field office. In addition, efforts to address discriminatory patterns in home lending have been limited. With the collapse of the subprime lending market after the recent financial crisis, predatory-style lending has been considerably less common.

As the City continues to work toward fulfilling its commitment to affirmatively further fair housing, it will continually assess the effectiveness of its actions, and attempt to identify additional actions to help realize its fair housing goals. This will require both building upon its successes, and addressing shortcomings in previous fair housing efforts. In continuing its commitment to affirmatively further fair housing, the city will consider a range of options and potential actions, including continuation of fair housing outreach and education and new efforts to promote equity in lending. In addition, the recent passage of the Wyoming Fair Housing Act provides an opportunity to explore the establishment of local or state level fair housing enforcement.

Review of the challenges that the City of Casper has faced in previous years, as well as efforts the City has undertaken to address those efforts, has informed the fair housing goals and actions included in this report.

THE CITY OF CHEYENNE

The City of Cheyenne completed an update to its analysis of impediments to fair housing choice in 2010. In that update, the City identified a series of impediments to fair housing choice, and proposed policies and actions to address each of those impediments:

Impediment 1: **The fact that Wyoming does not have a Fair Housing Law in place is an impediment to fair housing in Wyoming.** The Wyoming Fair Housing Act has gone before Wyoming Legislative session in 2005 and 2007 where the bill died in committee both times.

> *Action 1A:* The city of Cheyenne Housing & Community Development Office along with other city and state entities will work with Wyoming NAHRO to try and get another Fair Housing Act in front of the Wyoming Legislature -- begin 2010 and complete prior to December 2015.

Impediment 2: **Housing discrimination** – Housing discrimination, based on HUD complaint data, may be occurring on a very limited basis related to discriminatory terms, conditions and privileges for rental property, as well as disabilities and a lack of understanding and awareness about reasonable accommodation requirements.

> *Action 2A:* The city of Cheyenne Housing & Community Development Office will continue to work with Cheyenne Housing Authority and agencies, HUD-FHEO, and other groups and organizations to increase awareness and understanding of fair housing –- on-going action
> *Action 2B:* The city of Cheyenne Housing & Community Development Office will support efforts of the Cheyenne Housing Authority to increase distribution of fair housing information at every opportunity, including at resource fairs, and other housing-related conferences and seminars –- on-going action

Impediment 3: **Development-related impediments.** – These impediments include land development costs and impact fees and growth management and design regulations. Land development costs and fees, while necessary, impact the cost of housing, and in particular, the

cost of affordable housing. With residential development being fairly slowed now, it is a good time to evaluate and potentially create new programs and/or standards for affordable housing.

> *Action 3A:* The city of Cheyenne's Planning office will research current best practices in ordinance and building codes with affordable housing issues –- begin 2010 and complete prior to December 2015.
> *Action 3B:* The city of Cheyenne Planning office will also research the feasibility of using city owned land for affordable housing stock – begin 2010, complete by end of 2015.
> *Action 3C:* The city of Cheyenne Planning office will analyze current annexation and growth policies in regards to their effects on affordable housing -- begin 2010, complete by end of 2015.

Impediment 4: **There is a limited supply of affordable housing, particularly for low-median income households, large families, emergency and transitional housing units, and units for persons with disabilities that can accommodate their special needs** – There is a continuing need for additional housing units for all households at the lowest and median income levels, as well as larger units to accommodate families with several children. There is also a continuing need for emergency shelter space at domestic violence shelter and transitional housing for households who are able to work toward self-sufficiency. Housing that provides for the special needs of persons with disabilities are also in short supply and this demand is expected to continue to increase. Mobility is often the first disability considered; however there are other disabilities that may require special housing, such as vision or hearing impairment, or disabilities that require specific air quality controls.

> *Action 4A:* The city of Cheyenne Housing & Community Development Office will promote and encourage the development of affordable housing by directing grants and subsidies to developments that propose to serve these populations –- this action is on-going.
> *Action 4B:* The city of Cheyenne Planning Department will continue to promote a mix of housing unit types in all neighborhoods and new developments for residents of all economic levels, in locations where alternative transportation modes are available –- this action is on-going.
> *Action 4C:* The city of Cheyenne Housing & Community Development Office will continue to assist in the provision of services for the homeless, including emergency shelter space and transitional housing, as well as supportive services, by directing grants to the agencies that provide these services –- this action is on-going.
> *Action 4D:* The city of Cheyenne Housing & Community Development Office and the Cheyenne Housing Authority will continue to distribute information about housing rehabilitation programs, as well as down payment assistance, and other area sources of funding to encourage home ownership for households that are able to qualify for and maintain ownership –- this action is on-going.

Impediment 5. Language – Language is a barrier for those persons for whom English is not their first, or primary language. While many Spanish-speaking residents may be able to access translation services, there are many more languages being brought into the community, for which interpretation or translation services may be needed, but may be more difficult to find.

Action 5A: The city of Cheyenne Housing & Community Development Office will identify additional organizations that can provide translation services, including area educational institutions – begin 2010 and complete by early 2011 and update annually.
Action 5B: The city of Cheyenne Housing & Community Development Office will work with area housing agencies and organizations, including representatives of the real estate and lending industries, to determine the need for all to provide written materials in additional languages, beyond English and Spanish –- begin 2010 and complete by early 2011 and update annually

Impediment 6: **Other impediments** – During the course of this study, a number of other items were noted as being impediments to fair housing choice for many households; but which are, for the most part, beyond the City's ability to influence. These included a lack of education and job skills that makes it difficult to earn a livable wage; a lack of credit history, or bad credit and/or foreclosure history; a lack of transportation, particularly for those households who do not have a car; and a lack of adequate federal and state funding to carry out the necessary actions to further fair housing choice.

Action 6A: The city of Cheyenne will support organizations such as the Laramie County Community Partnership, Economic Development agencies, and other educational institutions to assist in improving area income levels by increasing the number of higher-paying jobs increasing job skills –- on-going.
Action 6B: The city of Cheyenne will support the development and implementation of alternative transportation modes, by ensuring that these plans are considered in all future planning and development efforts –- on-going.
Action 6C: The city of Cheyenne will support organizations such as the Laramie County Community Partnership, Cheyenne Housing Authority, Economic Development agencies, and other agencies in Cheyenne to assist in improving the understanding of Federal fair housing law, who is protected, the types of activities that constitute unlawful actions, and how to report a fair housing claim – on-going.

In its 2014 Consolidated Annual Plan Evaluation Report, the City provided a summary of actions that it had taken to address each of the impediments identified above. To address the lack of a fair housing law at the state level, the city worked with the Wyoming Chapter of the National Association of Housing and Redevelopment Officials (WyoNAHRO) to put a State Fair Housing Act in front of the legislature. The original goal was to have the Act before the legislature in 2015; in that year, the State passed the Wyoming Fair Housing Act, which protects state residents from discrimination in the housing market based on race, color, religion, sex, national origin, disability, and familial status.

To address discrimination in the housing market, the City's housing and community development office has worked with the Cheyenne Housing Authority and agencies, HUD FHEO, and other groups and organizations to increase awareness and understanding of fair housing law and policy.

To mitigate impediments relating to development, especially those that make it difficult to develop decent, affordable housing, the City is treating the recent slowdown in residential development to evaluate programs and standards for affordable housing, and to potentially

create new programs and standards. The City Metropolitan Planning Office has also updated PlanCheyenne, incorporating affordable housing priorities into the planning document.

To address impediments relating to language barriers, the City has made fair housing posters available in three languages, and has made contact with a state agency that provides translation services.

Finally, in spite of its limited capacity to address impediments relating to a lack of education and job skills, in adequate income, credit and foreclosure history, transportation, and lack of adequate funding levels, the City has acted, and will continue to act, where it can to address these impediments. For example, the City's Housing and Community Development Office has provided funding for Climb Wyoming to promote education and job skills for low-income, single mothers. The Office has also provided funding to Cheyenne Transit, which provides free transportation for low-income individuals.

As noted, the City has been successful in adopting policies and procedures to address each of the impediments identified in its 2010 AI Update. Of particular note was the successful passage of the Wyoming Fair Housing Act in 2015. As the City continues in its commitment to affirmatively further fair housing, it will continue to build upon these successes, even as it seeks to identify new approaches to ensure that Cheyenne residents have fair access to housing and community assets.

Review of the challenges that the City of Cheyenne has faced in previous years, as well as efforts the City has undertaken to address those efforts, has informed the fair housing goals and actions included in this report.

THE STATE OF WYOMING

The State of Wyoming completed its most recent Analysis of Impediments to Fair Housing Choice in 2011. In that report, the State identified the following impediments to fair housing choice, and made recommendations on how to address those impediments:

Private Sector Impediments, Actions, and Measurable Objectives

***Impediment 1:* 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

***Impediment 2:* 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

***Impediment 3:* 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

Impediment 4: **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

Impediment 5: **Preferences stated in advertisements for rental housing**
Suggested Actions: Raise awareness and educate landlords and property management companies in fair housing law

Impediment 6: **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

Impediment 7: **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

Impediment 8: **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

Impediment 9: **Denial of loans specifically for homes within tribal trust lands**
Suggested Actions: Research reasons for denial of loans within tribal trust lands

Impediment 10: **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

Impediment 11: **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 Impediments, Actions, and Measurable Objectives

Impediment 1: **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

Impediment 2: **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

Impediment 3: **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

Impediment 4: **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

Impediment 5: **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

Impediment 6: **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

Impediment 7: **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

The Wyoming Community Development Authority (WCDA) has conducted a range of activities in order to address the impediments identified in the 2011 Analysis of Impediments to Fair Housing Choice. In order to ensure that tenants are not denied occupancy for reasons that are out of line with the Fair Housing Act, the WCDA has reviewed denials for occupancy at every on-site visit.

In addition, the WCDA has taken a number of steps to promote fair housing outreach and education. It has conducted training sessions that feature in-depth discussions of fair housing rules and regulations, including one that was conceived and hosted in partnership with the Wyoming chapter of the National Association of Housing and Rehabilitation Officials (WyoNAHRO) at its 2014 Conference. Finally, the WCDA Compliance Officer sends regular fair housing "information and reminders" emails to owners, developers, management companies, and on-site property managers.

To promote broader access to fair housing services, and to provide additional outreach and education to state residents, the WCDA has revamped its website, which now includes fair housing information in multiple places. The fair housing information provided on the site includes a discussion on how to file a claim of housing discrimination.

To promote broader access to home lending and fair housing resources among Wyoming residents, the Wyoming Housing Network (WHN) has provided information on how to maintain good credit and file a fair housing complaint as part of its broader counseling efforts. The WHN provides one-on-one counseling sessions and an online homebuyer education class with funding provided by the WCDA, who requires that all homebuyers getting a WCDA first mortgage attend the class and counseling sessions. The online class includes a module on fair housing, which provides information on equal opportunity credit, and how to file a fair housing complaint.

In 2013, the WCDA resumed management of HOME project monitoring, which is now the direct responsibility of the WCDA Compliance Officer. As part of its monitoring activities, the WCDA sponsors annual compliance workshops, requiring managers to attend a workshop at least once every three years. Owners and developers are required to attend once every five years.

The Wyoming Community Development Authority has been successful in implementing a range of policies designed to address impediments to fair housing choice identified in the 2011 Analysis of Impediments. These policies are described above. In addition, the 2015 passage of the Wyoming Fair Housing Act successfully eliminates one of the impediments identified in 2011, and provides an opportunity to establish the infrastructure necessary to ensure that fair housing services are readily available to state residents. Of course, some of the goals identified in that document remain works in progress, and the state will continue to work toward ensuring that there is an adequate supply of decent, affordable, and accessible housing, and that all state residents have access to fair housing choice.

Review of the challenges that the State of Wyoming has faced in previous years, as well as efforts the State has undertaken to address those efforts, has informed the fair housing goals and actions included in this report.

SECTION IV. FAIR HOUSING ANALYSIS

A: DEMOGRAPHIC SUMMARY

Included in the Wyoming Fair Housing Team are the Wyoming Business Council and Wyoming Community Development Authority, which have directed the project and are responsible for designing and administering fair housing policy at the state level. The Fair Housing Team also includes the cities of Casper and Cheyenne, along with their respective public housing agencies, and the qualified public housing agencies of Buffalo, Douglas, Evanston, Hanna, Lusk, and Rock Springs.

The demographic summary included in this section includes summaries of data relating to the cities of Casper and Cheyenne and the state as a whole. These cities, as Wyoming's only entitlements, are treated as "jurisdictions" and the state as the "region" for purposes of this report. Thus, in satisfying HUD requirements, sections of this report covering Casper and Cheyenne should be taken to constitute the jurisdiction analysis, while sections regarding Wyoming will comprise the regional analysis.

These areas were included in order to satisfy HUD requirements that any partners to a collaborative AFH ensure that demographic and social trends in their own jurisdictions are included in the analysis. In addition, the State has elected to analyze these sub-areas for the same reasons that it chose to enter into a collaboration with each of the members of the fair housing team: in recognition of the need for broad collaboration and coordination among members of the fair housing team on fair housing planning throughout the state.

The following narrative addresses each of the geographic areas included in the study.

THE CITY OF CASPER

The white, non-Hispanic population accounted for 88.4 percent of Casper's 55,316 residents in 2010, as shown in Table IV.1 on the following page. This was a smaller percentage of residents who were white and non-Hispanic than was observed in 1990, a reduction that was attributable to comparatively rapid growth among Hispanic and non-white residents. The Hispanic population grew from 1,165 residents, or 2.5 percent of the population in 1990 to 4,070 residents, or 7.4 percent, by 2010. The Hispanic population of Casper grew by around 12.5 percent per year.

The percentage of families in the City of Casper that include children has declined since 1990, when children were present in just over a third of city families. By 2010 that figure had fallen to 28.6 percent.

Table IV.1
Demographic Change Since 1990
The City of Casper
1990, 2000, and 2010 Census, 2010-2014 ACS

	City of Casper					
	1990		2000		2010	
Race/Ethnicity	#	%	#	%	#	%
White, Non-Hispanic	44,167	94.5	45,334	91.32	48,886	88.4
Black, Non-Hispanic	335	0.7	399	0.8	523	0.9
Hispanic	1,811	3.9	2,656	5.35	4,070	7.4
Asian or Pacific Islander, Non-Hispanic	190	0.4	244	0.5	433	0.8
Native American, Non-Hispanic	199	0.4	421	0.9	398	0.7
National Origin						
Foreign-born	746	1.6	997	2.0	1,405*	2.43*
LEP						
Limited English Proficiency	496	1.2	624	1.3	1,021*	4.3*
Sex						
Male	22,577	48.3	24,191	48.73	27,517	49.7
Female	24,165	51.7	25,453	51.27	27,799	50.3
Age						
Under 18	13,527	28.9	12,842	25.87	13,222	23.9
18-64	27,960	59.8	30,048	60.53	34,978	63.2
65+	5,255	11.2	6,754	13.60	7,116	12.9
Family Type						
Families with children	6,803	37.0	6,944	34.13	6,509	28.6

* Based on 2010-2014 ACS Data

Residents born outside of the United States accounted for 1.6 percent of Casper residents in 1990, a share which grew to 2 percent by 2000 and 2.4 percent by 2010. Mexican-born residents represented the largest share of the foreign-born population in Casper, and accounted for around one percent of the city population in 2010-2014, as shown in Table IV.2 below.

Table IV.2
Birthplace of Residents Born Outside of the U.S.
The City of Casper
2014 Five-Year ACS Data

	City of Casper		
National Origin	**Country**	#	%
#1 country of origin	Mexico	504	0.9
#2 country of origin	Philippines	244	0.4
#3 country of origin	Trinidad and Tobago	80	0.1
#4 country of origin	Canada	64	0.1
#5 country of origin	Brazil	58	0.1
#6 country of origin	Thailand	54	0.1
#7 country of origin	Haiti	45	0.1
#8 country of origin	China excluding Hong Kong and Taiwan	41	0.1
#9 country of origin	Scotland	28	0.0
#10 country of origin	Guatemala	26	0.0

Historically, LEP residents have made up a relatively small share of the population of Casper (1.2 percent in 1990). By 2010-2014 the city's 1,021 LEP residents accounted for around 1.9 percent of the city population. Some 747 LEP residents of Casper spoke Spanish in 2010-2014, or around 1.4 percent of the total population, as shown in Table IV.3 on the following page.

Table IV.3
Primary Language of LEP Residents
The City of Casper
2014 Five-Year ACS Data

	City of Casper		
Limited English Proficiency (LEP) Language	**Language**	#	%
#1 LEP Language	Spanish	747	1.4
#2 LEP Language	Chinese	56	0.1
#3 LEP Language	German	45	0.1
#4 LEP Language	Other Native North American languages	36	0.1
#5 LEP Language	French	34	0.1
#6 LEP Language	Tagalog	31	0.1
#7 LEP Language	Russian	24	0.0
#8 LEP Language	Hmong	19	0.0
#9 LEP Language	Other Asian languages	13	0.0
#10 LEP Language	Serbo Croatian	9	0.0

Around 12.1 percent of the population of Casper was living with some form of disability in 2010-2014, or an estimated 6,914 city residents, as shown in Table IV.4 below.

Table IV.4
Disability by Age
City of Casper
2014 Five-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	11	0.6%	0	0.0%	11	0.3%
5 to 17	352	6.8%	134	2.9%	486	5.0%
18 to 34	298	3.9%	395	5.4%	693	4.6%
35 to 64	1,546	14.0%	1,617	15.6%	3,163	14.7%
65 to 74	468	29.8%	560	27.7%	1,028	28.6%
75 or Older	681	50.9%	852	44.3%	1,533	47.0%
Total	**3,356**	**11.7%**	**3,558**	**12.6%**	**6,914**	**12.1%**

Independent living difficulties were the most common form of disability, affecting 7.2 percent of city residents, as shown in Table IV.5 below. Around 5.6 percent of the population experienced an ambulatory difficulty during that time, 4.5 percent had a cognitive difficulty, and 4 percent experienced hearing difficulties.

Table IV.5
Disability by Type
City of Casper
2014 Five-Year ACS Data

Disability Type	#	%
Hearing difficulty	2,295	4.0
Vision difficulty	1,548	2.7
Cognitive difficulty	2,377	4.5
Ambulatory difficulty	2,991	5.6
Self-care difficulty	944	1.8
Independent living difficulty	3,118	7.2

Owner-occupied housing, as a percentage, has fallen in the City of Casper since 2010, but rose from 2000 to 2010. The 2014 Five-Year ACS estimate of 65.2 percent is the lowest owner-occupied percentage since 2000 (see Table IV.6 below). Similarly, the renter-occupied housing percentage in 2014 (34.8 percent) is the highest since 2000. The number of housing units has risen steadily since 2000, with the 2014 figure of just over 25,500 representing a nearly 17 percent increase over that time period. See the four maps beginning with Map IV.1 on page 45 for owner and renter data in Casper, Cheyenne, and the State.

Table IV.6
Housing Units by Tenure
City of Casper
2000 & 2010 Census, 2014 Five-Year ACS Data

Tenure	2000 Census		2010 Census		2014 Five-Year ACS	
	Units	% of Total	Units	% of Total	Units	% of Total
Occupied Housing Units	20,343	93.0%	22,794	92.9%	23,535	92.1%
Owner-Occupied	13,616	66.9%	15,309	67.2%	15,343	65.2%
Renter-Occupied	6,727	33.1%	7,485	32.8%	8,192	34.8%
Vacant Housing Units	1,529	7.0%	1,742	7.1%	2,024	7.9%
Total Housing Units	**21,872**	**100.0%**	**24,536**	**100.0%**	**25,559**	**100.0%**

THE CITY OF CHEYENNE

While the Hispanic population did not grow as quickly in the City of Cheyenne, Hispanic residents accounted for a larger percentage of the city population than in Casper: 14.5 percent in 2010, as shown in Table IV.7 below. As in Casper, growth in this population after 1990 outpaced growth in the population of the city as a whole. By contrast, owing to relatively slow growth between 1990 and 2010, white, non-Hispanic residents fell from 83.4 to 78.7 percent of the population during that time.

As was the case in the City of Casper, families with children have declined considerably as a share of families overall, from 34.6 percent in 1990 to 27.2 percent in 2010.

Table IV.7
Demographic Change Since 1990
The City of Cheyenne
1990, 2000, and 2010 Census, 2010-2014 ACS

	City of Cheyenne					
	1990		2000		2010	
Race/Ethnicity	#	%	#	%	#	%
White, Non-Hispanic	41,675	83.3	43,146	81.4	46,818	78.7
Black, Non-Hispanic	1,506	3.0	1,399	2.6	1,567	2.6
Hispanic	5,804	11.6	6,646	12.5	8,594	14.5
Asian or Pacific Islander, Non-Hispanic	550	1.1	583	1.1	793	1.3
Native American, Non-Hispanic	422	0.8	329	0.6	371	0.6
National Origin						
Foreign-born	1,194	2.4	1,739	3.3	1,785*	2.9*
LEP						
Limited English Proficiency	1,089	2.6	1,311	2.6	885*	3.5*
Sex						
Male	24,371	48.7	25,870	48.80	29,330	49.3
Female	25,637	51.3	27,141	51.20	30,136	50.7
Age						
Under 18	13,169	26.3	13,213	24.93	14,260	24.0
18-64	30,902	61.8	32,485	61.28	37,170	62.5
65+	5,937	11.9	7,313	13.80	8,036	13.5
Family Type						
Families with children	7,009	34.6	7,303	32.71	6,949	27.2

* Based on 2010-2014 ACS Data

In 1990, the City of Cheyenne had a larger foreign-born population, as a percentage of the overall population, than the City of Casper. Around 1,200 city residents in 1990 had been born outside of the country, or 2.4 percent of the city population. By 2000 that figure had grown to 3.3 percent. However, the percentage of residents who were foreign-born declined after 2000, and stood at 2.9 percent in 2010-2014. According to ACS estimates from that time period, this decline appears to have been due to relatively slow growth in the foreign-born population, rather than an absolute decline in the number of residents born outside of the country.

As was the case in Casper, Mexican-born residents represented the largest foreign-born population in Cheyenne in 2010-2014. In Cheyenne an estimated 21 percent of the foreign-born population was Mexican by birth in 2010-2014, as shown in Table IV.8 below.

Table IV.8
Birthplace of Residents Born Outside of the U.S.
The City of Cheyenne
2014 Five-Year ACS Data

	City of Cheyenne		
National Origin	**Country**	#	%
#1 country of origin	Mexico	373	0.6
#2 country of origin	China excluding Hong Kong and Taiwan	185	0.3
#3 country of origin	Philippines	125	0.2
#4 country of origin	Korea	122	0.2
#5 country of origin	Germany	103	0.2
#6 country of origin	England	89	0.1
#7 country of origin	Canada	65	0.1
#8 country of origin	Sri Lanka	65	0.1
#9 country of origin	Japan	58	0.1
#10 country of origin	Ukraine	54	0.1

As the foreign-born population of Cheyenne declined after 2000, so too did the percentage of LEP residents. These residents accounted for around 2.6 percent of the population in 1990 and 2000, numbering 1,311 in the latter year. By 2010-2014, the LEP population had fallen to 1.5 percent of the total population, or an estimated 885 residents, as shown in Table IV.9 below. Two-thirds of those residents spoke Spanish or Chinese.

Table IV.9
Primary Language of LEP Residents
The City of Cheyenne
2014 Five-Year ACS Data

	City of Cheyenne		
Limited English Proficiency (LEP) Language	**Language**	**#**	**%**
#1 LEP Language	Spanish	392	0.7
#2 LEP Language	Chinese	207	0.4
#3 LEP Language	Korean	81	0.1
#4 LEP Language	German	57	0.1
#5 LEP Language	African languages	40	0.1
#6 LEP Language	Other Indo European languages	28	0.0
#7 LEP Language	Other Slavic languages	17	0.0
#8 LEP Language	Thai	17	0.0
#9 LEP Language	Japanese	16	0.0
#10 LEP Language	French	10	0.0

The percentage of residents living with a disability in Cheyenne, at 11.9 percent, was slightly below the statewide average in 2010-2014, as shown in Table IV.10 below.

Table IV.10
Disability by Age
City of Cheyenne
2014 Five-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	**Disability Rate**	**Disabled Population**	**Disability Rate**	**Disabled Population**	**Disability Rate**
Under 5	0	0.0%	0	0.0%	0	0.0%
5 to 17	465	8.4%	169	3.3%	634	5.9%
18 to 34	517	6.9%	455	6.1%	972	6.5%
35 to 64	1,266	12.0%	1,387	12.4%	2,653	12.2%
65 to 74	461	23.5%	572	23.3%	1,033	23.4%
75 or Older	658	47.3%	1,177	50.5%	1,835	49.3%
Total	**3,367**	**11.7%**	**3,760**	**12.2%**	**7,127**	**11.9%**

Of the estimated 7,127 residents living with a disability at that time, around 8.2 percent of the population had some form of independent living difficulty, 5.7 were living with an ambulatory difficulty, 5.5 percent with a cognitive difficulty, and 3.3 percent with a hearing difficulty, as shown in Table IV.11 below.

Table IV.11
Disability by Type
City of Cheyenne
2014 Five-Year ACS Data

Disability Type	#	%
Hearing difficulty	1,950	3.3
Vision difficulty	1,036	1.7
Cognitive difficulty	3,036	5.5
Ambulatory difficulty	3,179	5.7
Self-care difficulty	1,181	2.1
Independent living difficulty	3,674	8.2

Owner-occupied housing, as a percentage, has fallen in the City of Cheyenne since 2010, but rose from 2000 to 2010. The 2014 Five-Year ACS estimate of 62.4 percent is the lowest owner-occupied percentage since 2000 (see Table IV.12 below). Similarly, the renter-occupied housing percentage in 2014 (37.6 percent) is the highest since 2000. The number of housing units has risen steadily since 2000, with the 2014 figure of just over 27,500 representing a nearly 16 percent increase over that time period. See the four maps beginning with Map IV.1 on page 45 for owner and renter data in Casper, Cheyenne, and the State.

Table IV.12
Housing Units by Tenure
City of Cheyenne
2000 & 2010 Census, 2014 Five-Year ACS Data

Tenure	2000 Census		2010 Census		2014 Five-Year ACS	
	Units	% of Total	Units	% of Total	Units	% of Total
Occupied Housing Units	22,324	93.9%	25,557	93.7%	25,007	90.9%
Owner-Occupied	14,739	66.0%	16,301	63.8%	15,597	62.4%
Renter-Occupied	7,585	34.0%	9,256	36.2%	9,410	37.6%
Vacant Housing Units	1,458	6.1%	1,726	6.3%	2,518	9.1%
Total Housing Units	**23,782**	**100.0%**	**27,283**	**100.0%**	**27,525**	**100.0%**

THE STATE OF WYOMING

The State of Wyoming grew by over 110,000 between 1990 and 2010, or 24.3 percent. White, non-Hispanic residents account for a large majority of the state's population; however, that population has grown relatively slowly since that time, falling from 91.1 percent of the state's population in 1990 to 85.9 percent by 2010, as shown in Table IV.13 below. By contrast, the Hispanic population has grown rapidly over the same time period, roughly tripling in size and as a share of the state population. By 2010, the state's more than 50,000 Hispanic residents accounted for 8.9 percent of the total population. Around 28.1 percent of families throughout the state included children in 2010, down from 38.9 percent in 1990. Table IV.13 below presents other demographic trends in the state since 1990.

Table IV.13
Demographic Change Since 1990
The State of Wyoming
1990, 2000, and 2010 Census, 2010-2014 ACS

	The State of Wyoming					
	1990		2000		2010	
Race/Ethnicity	#	%	#	%	#	%
White, Non-Hispanic	413,389	91.1	438,799	88.9	483,874	85.9
Black, Non-Hispanic	3,148	0.7	3,504	0.7	4,351	0.8
Hispanic	24,976	5.5	31,669	6.4	50,231	8.9
Asian or Pacific Islander, Non-Hispanic	2,567	0.6	2,934	0.6	4,644	0.8
Native American, Non-Hispanic	9,323	2.1	10,238	2.1	11,784	2.1
National Origin						
Foreign-born	7,647	1.7	11,205	2.3	19,336	3.36
LEP						
Limited English Proficiency	7,266	1.8	8,919	1.9	10,279	4.6
Sex						
Male	227,065	50.1	248,374	50.30	287,437	51.0
Female	226,523	49.9	245,408	49.70	276,189	49.0
Age						
Under 18	135,081	29.8	128,873	26.10	135,402	24.0
18-64	271,462	59.8	307,216	62.22	358,134	63.5
65+	47,045	10.4	57,693	11.68	70,090	12.4
Family Type						
Families with children	65,921	38.9	67,742	34.99	63,736	28.1

* Based on 2010-2014 ACS Data

In 1990, there were 7,647 Wyoming residents who had been born outside of the United States, or around 1.7 percent of the population. As the state's population grew, so too did the share of foreign-born residents, to 2.3 percent in 2000 and 3.4 percent in 2010-2014. According to American Community Survey estimates, those born in another country numbered around 19,000 in that time period. Around 40 percent of foreign-born residents were from Mexico in 2010-2014: these residents accounted for around 1.5 percent of the overall population, as shown in Table IV.14 below.

Table IV.14
Birthplace of Residents Born Outside of the U.S.
The State of Wyoming
2014 Five-Year ACS Data

	The State of Wyoming		
National Origin	**Country**	#	%
#1 country of origin	Mexico	8,601	1.5
#2 country of origin	Philippines	1,121	0.2
#3 country of origin	Canada	1,021	0.2
#4 country of origin	China excluding Hong Kong and Taiwan	773	0.1
#5 country of origin	Germany	636	0.1
#6 country of origin	India	389	0.1
#7 country of origin	England	372	0.1
#8 country of origin	Korea	369	0.1
#9 country of origin	Guatemala	314	0.1
#10 country of origin	Chile	289	0.1

Around 1.8 percent of state residents over the age of 5 spoke English "less than 'very well'" in 2000, according to the decennial Census from that year: these residents are considered to have limited English proficiency (LEP). Between 1990 and 2000, the number of LEP individuals rose from 7,266 to 8,919, or around 1.9 percent of the population. Growth in the LEP population

after 2000 kept pace with the growth in the overall population, and by 2010-2014 the state's 10,279 LEP residents remained at around 1.9 percent of the population. More than three-quarters of the LEP population at that time spoke Spanish, and Spanish-speaking LEP residents made up around 1.5 percent of the state's population in 2010-2014, as shown in Table IV.15 below.

Table IV.15
Primary Language of LEP Residents
The City of Cheyenne
2014 Five-Year ACS Data

	The State of Wyoming		
Limited English Proficiency (LEP) Language	**Language**	#	%
#1 LEP Language	Spanish	7,924	1.5
#2 LEP Language	Chinese	525	0.1
#3 LEP Language	German	233	0.0
#4 LEP Language	Tagalog	229	0.0
#5 LEP Language	Other Pacific Island languages	137	0.0
#6 LEP Language	French	134	0.0
#7 LEP Language	Other Indic languages	134	0.0
#8 LEP Language	Korean	126	0.0
#9 LEP Language	Vietnamese	98	0.0
#10 LEP Language	Other Native North American languages	72	0.0

An estimated 67,770 residents were living with some form of disability in 2010-2014, or 12 percent of the population, as shown in Table IV.16 below.

Table IV.16
Disability by Age
State of Wyoming
2014 Five-Year ACS Data

Age	Male		Female		Total	
	Disabled Population	Disability Rate	Disabled Population	Disability Rate	Disabled Population	Disability Rate
Under 5	258	1.3%	117	0.6%	375	1.0%
5 to 17	3,122	6.2%	1,595	3.4%	4,717	4.8%
18 to 34	4,695	6.8%	3,588	5.6%	8,283	6.2%
35 to 64	15,214	13.5%	13,402	12.2%	28,616	12.9%
65 to 74	6,300	29.6%	4,835	22.3%	11,135	25.9%
75 or Older	6,526	49.8%	8,118	48.5%	14,644	49.0%
Total	**36,115**	**12.6%**	**31,655**	**11.4%**	**67,770**	**12.0%**

The most common forms of disability included independent living and ambulatory disabilities, which affected 7.0 and 5.9 percent of the state population, respectively. Those with hearing and cognitive difficulties represented 4.5 and 4.4 percent of the population, respectively, as shown in Table IV.17 below.

Table IV.17
Disability by Type
City of Casper
2014 Five-Year ACS Data

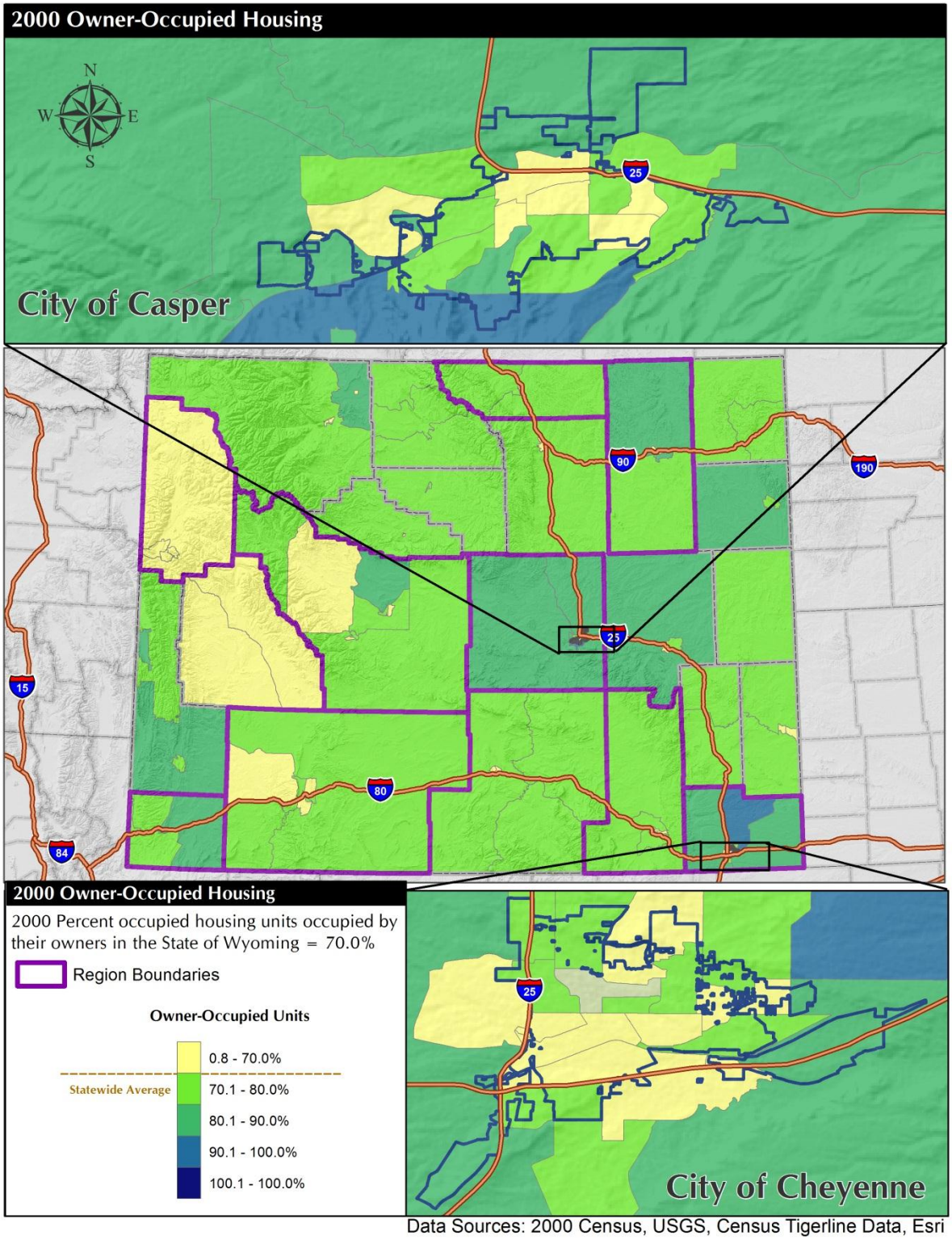
Disability Type	#	%
Hearing difficulty	25,178	4.5
Vision difficulty	11,947	2.1
Cognitive difficulty	23,106	4.4
Ambulatory difficulty	31,327	5.9
Self-care difficulty	9,980	1.9
Independent living difficulty	30,157	7.0

Owner-occupied housing, as a percentage, has fallen in the City of Cheyenne since 2010, but rose from 2000 to 2010. The 2014 Five-Year ACS estimate of 62.4 percent is the lowest owner-occupied percentage since 2000 (see Table IV.18 below). Similarly, the renter-occupied housing percentage in 2014 (37.6 percent) is the highest since 2000. The number of housing units has risen steadily since 2000, with the 2014 figure of just over 27,500 representing a nearly 16 percent increase over that time period. See the four maps beginning with Map IV.1 below for owner and renter data in Casper, Cheyenne, and the State.

Table IV.18
Housing Units by Tenure
State of Wyoming
2000 & 2010 Census, 2014 Five-Year ACS Data

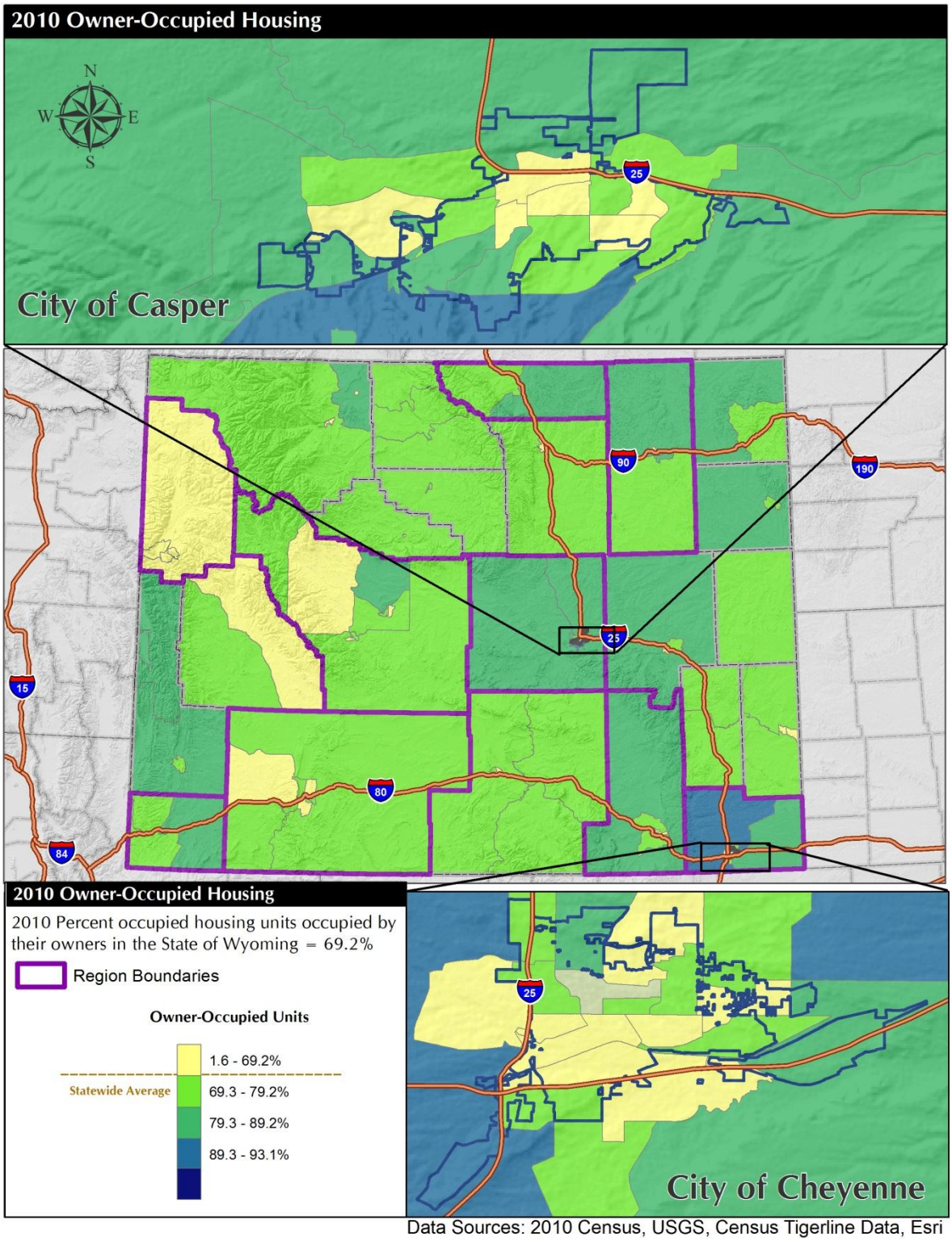
Tenure	2000 Census		2010 Census		2014 Five-Year ACS	
	Units	% of Total	Units	% of Total	Units	% of Total
Occupied Housing Units	193,608	86.5%	226,879	86.6%	225,514	85.0%
Owner-Occupied	135,514	70.0%	157,077	69.2%	156,289	69.3%
Renter-Occupied	58,094	30.0%	69,802	30.8%	69,225	30.7%
Vacant Housing Units	30,246	13.5%	34,989	13.4%	39,681	15.0%
Total Housing Units	**223,854**	**100.0%**	**261,868**	**100.0%**	**265,195**	**100.0%**

Map IV.1
2000 Owner-Occupied Housing
2000 Census



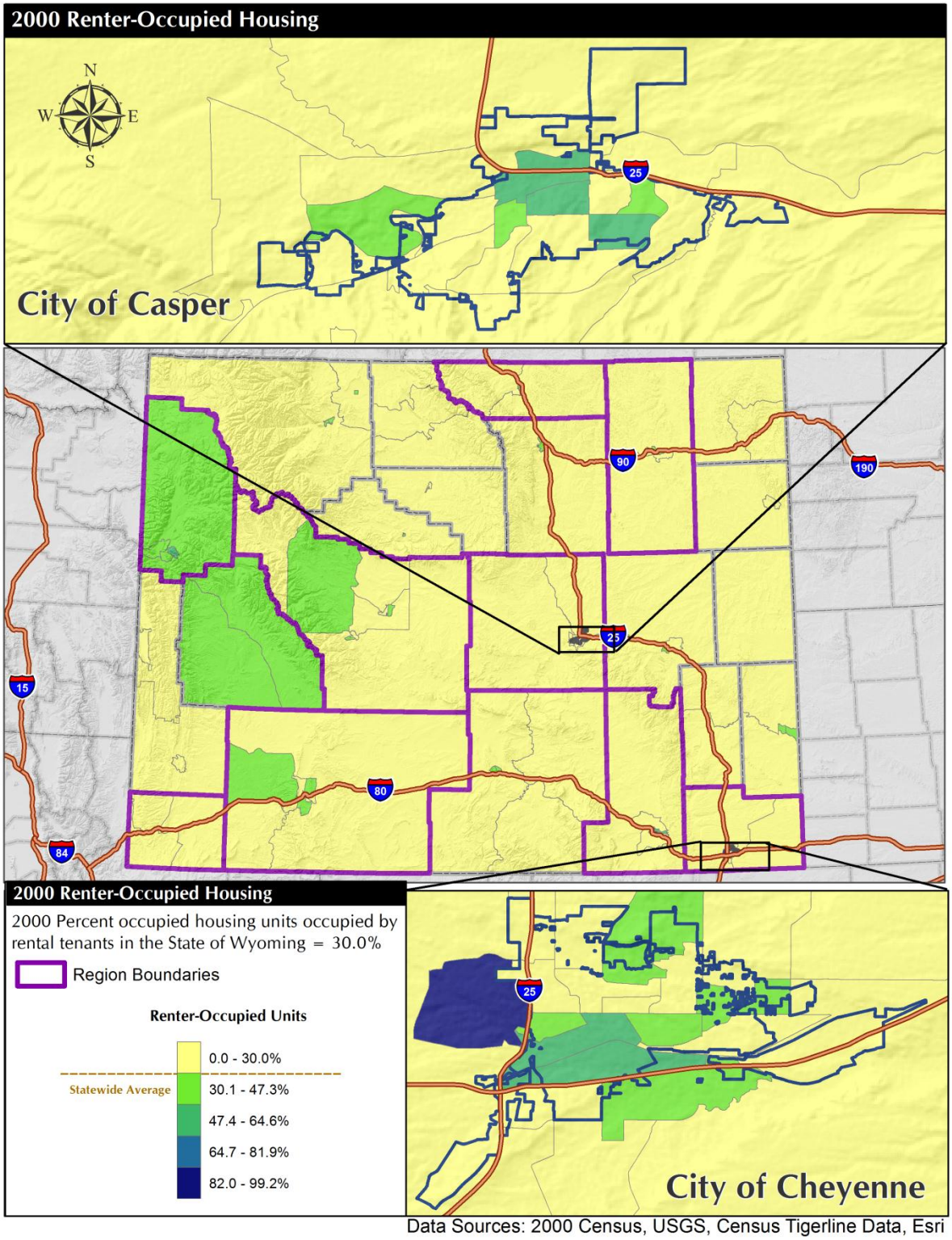
Data Sources: 2000 Census, USGS, Census Tigerline Data, Esri

Map IV.2
2010 Owner-Occupied Housing
2010 Census



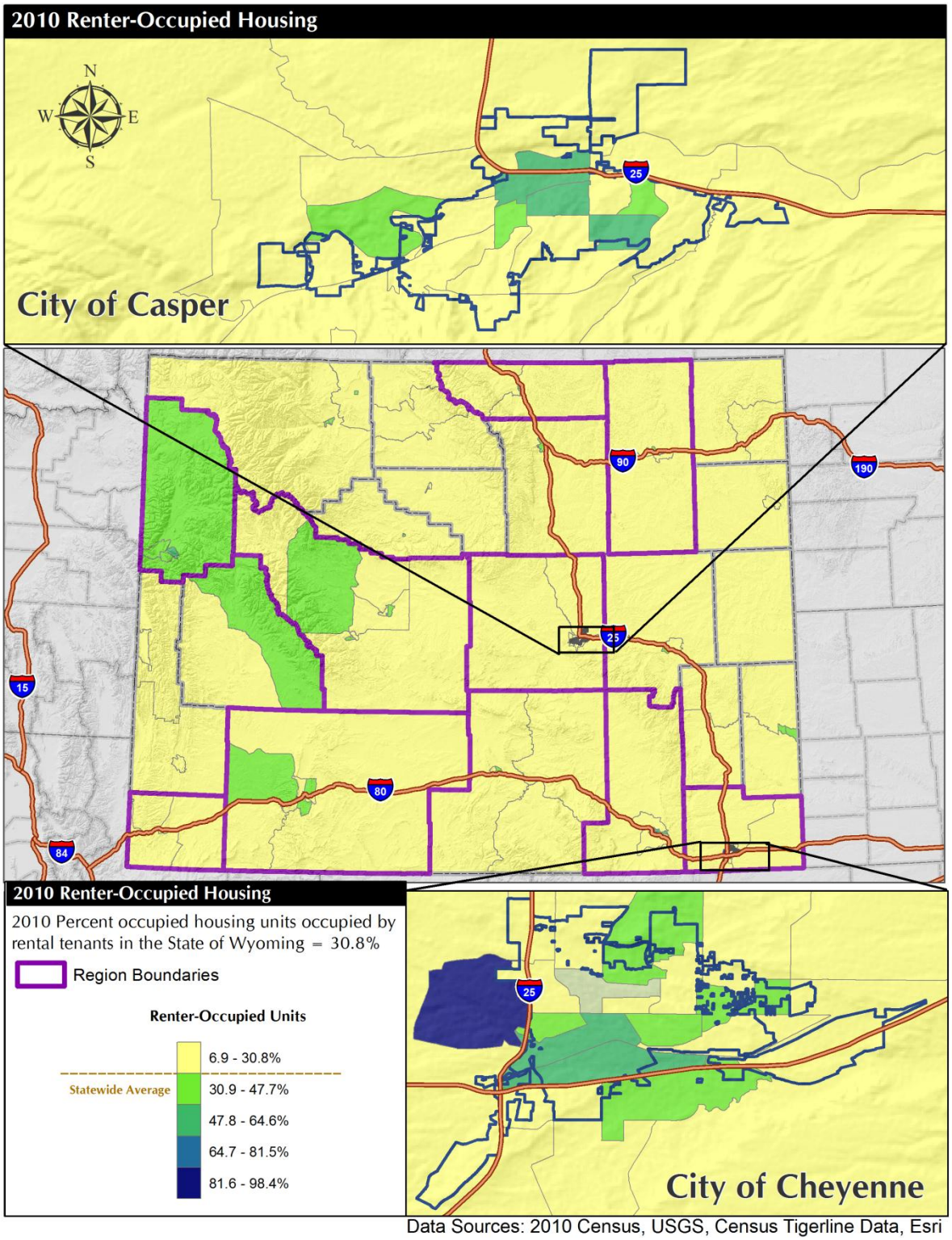
Data Sources: 2010 Census, USGS, Census Tigerline Data, Esri

Map IV.3
2000 Renter-Occupied Housing
2000 Census



Data Sources: 2000 Census, USGS, Census Tigerline Data, Esri

Map IV.4
2010 Renter-Occupied Housing
2010 Census



Data Sources: 2010 Census, USGS, Census Tigerline Data, Esri

B: Segregation/Integration

Analysis

This dissimilarity index measures the degree to which two groups are evenly distributed across a geographic area and is commonly used for assessing residential segregation between two groups. Values range from 0 to 100, where higher numbers indicate a higher degree of segregation among the two groups measured.

Dissimilarity index values between 0 and 39 generally indicate low segregation, values between 40 and 54 generally indicate moderate segregation, and values between 55 and 100 generally indicate a high level of segregation. However, context is important in interpreting the dissimilarity index. The index does not indicate spatial patterns of segregation, just the relative degree of segregation; and, for populations that are small in absolute numbers, the dissimilarity index may be high even if the group's members are evenly distributed throughout the area. Generally, when a group's population is less than 1,000, program participants should exercise caution in interpreting associated dissimilarity indices. Also, because the index measures only two groups at a time, it is less reliable as a measure of segregation in areas with multiple demographic groups.

The dissimilarity index provides a quantitative measure of segregation in an area, based on the demographic composition of smaller geographic units within that area. One way of understanding the index is that it indicates how evenly two demographic groups are distributed throughout an area: if the composition of both groups in each geographic unit (e.g., Census tract) is the same as in the area as a whole (e.g., county), then the dissimilarity index score for that county will be 0. By contrast; and again using Census tracts as an example; if one population is clustered entirely within one Census tract, the dissimilarity index score for the county will be 1. The higher the dissimilarity index value, the higher the level of segregation in an area.

A Note on Methodology

The dissimilarity indices included in this study were calculated from data provided by the Census Bureau according to the following formula:

$$\mathrm{D}_j^{WB} = 100 * \frac{1}{2} \sum_{i=1}^{N} \left| \frac{W_i}{W_j} - \frac{B_i}{B_j} \right|$$

Where *i* indexes a geographic unit, *j* is the jth jurisdiction, *W* is group one and *B* is group two, and *N* is the number of geographic units, starting with *i,* in jurisdiction j.[1]

This is the formula that HUD uses to calculate dissimilarity index values. In most respects (including the use of tract-level data available through the Brown Longitudinal Tract Database),

[1] Affirmatively Furthering Fair Housing Data Documentation. HUD. December 2015.

the methodology employed in this study exactly duplicates HUD's methodology for calculating the index of dissimilarity.

The principle exception was the decision to use Census tract-level data to calculate dissimilarity index values through 2010 (While HUD uses tract level data in 1990 and 2000, the agency uses block group-level data in 2010). The decision to use tract-level data in all years included in the study was motivated by the fact that the dissimilarity index is sensitive to the geographic base unit from which it is calculated. Concretely, use of smaller geographic units produces dissimilarity index values that tend to be higher than those calculated from larger geographic units.[2]

For that reason, use of Census tract-level data through 2000 and block group-level data in 2010 would almost certainly introduce error into the analysis of segregation trends, potentially indicating an increase in segregation that did not necessarily occur. Table IV.19 below demonstrates the impact of geographic base unit size on dissimilarity index values. As shown, index values calculated from block level data (the smallest geographic unit available) were substantially higher than those calculated from tract or county-level data, even within the same year and same overall area. Use of the same geographic units from one year to the next removes this potential source of error.

Table IV.19
Dissimilarity Index Values by Geographic Level
State of Wyoming
2010 Census Data

Dissimilarity Index	Geographic Level			
	Block	Block Group	Tract	County
Non-White/White	51.29	31.81	28.69	23.04
Black/White	81.90	48.09	44.50	37.30
Hispanic/White	53.96	31.37	27.64	20.95
Asian or Pacific Islander/White	79.58	37.50	32.88	25.62
Native American/White	82.01	63.57	62.56	62.17

Note that, as a general rule, HUD considers the following thresholds to indicate low, moderate, and high levels of segregation:

Measure	Values	Description
Dissimilarity Index	<40	Low Segregation
[range 0-100]	40-54	Moderate Segregation
	>55	High Segregation

THE CITY OF CASPER

Dissimilarity index values illustrating the degree of segregation present in the City of Casper are presented in Table IV.20 below. This table presents the observed level of segregation between white and non-white residents; black and white residents; Hispanic and white, non-Hispanic residents; Asian/Pacific Islander and white residents; and Native American and white residents. As shown, all index values indicated a low level of segregation between all of these groups in all years included in the study.

[2] Wong, David S. "Spatial Decomposition of Segregation Indices: A Framework Toward Measuring Segregation at Multiple Levels." Geographical Analyses, 35:3. The Ohio State University. July 2003. P. 179.

In most cases, the level of segregation between groups fell from one year to the next: exceptions were observed in the Asian/Pacific Islander and Native American populations. Dissimilarity index values between these groups rose from 1990 to 2000, before falling again by 2010. However, in neither case did the level of segregation between these groups rise above "low", as measured against the thresholds provided by HUD. In addition, each group accounted for fewer than 1,000 city residents at all years included in the study.

Table IV.20
Dissimilarity Index Values
The City of Casper
Brown Longitudinal Tract Database, 2010 Census

	City of Casper		
Racial/Ethnic Dissimilarity Index	**1990**	**2000**	**2010**
Non-White/White	18.93	16.87	15.19
Black/White	38.21	30.31	24.92
Hispanic/White	30.90	17.52	17.29
Asian or Pacific Islander/White	17.98	29.74	16.79
Native/White	19.65	35.40	32.63

Regarding high segregation and integration by race/ethnicity, national origin, LEP group, and owner- and renter-occupied housing, there were no areas of segregation identified in the City of Casper.

Historically, the segregation level in the city declined in most cases between 1990 and 2000 and in all cases between 2000 and 2010 (see Table IV.20 above). The Fair Housing Team has identified no trends, policies, or practices that are likely to contribute to higher segregation in the future.

Additional Information

No additional relevant information to report.

Contributing Factors of Segregation

Segregation has not been a prominent issue in the City of Casper since 1990, according to the index of dissimilarity. The level of segregation between racial groups in the city declined in most cases between 1990 and 2000, and in all cases between 2000 and 2010. Currently, no groups in the city exhibit more than a low level of segregation from other groups.

THE CITY OF CHEYENNE

Table IV.21 below illustrates the degree of segregation observed in the City of Cheyenne in 1990, 2000, and 2010, as measured by the dissimilarity index. As was the case in Casper, the level of segregation between each of the population pairs listed in the table was typically low. Exceptions included the degree of segregation between Hispanic and white, non-Hispanic residents in 1990, and between Native American and white residents in 2000. However, the level of segregation between Hispanic and white residents fell dramatically after 1990, and the degree of segregation between the groups has been low since that time.

In addition, the moderate level of segregation between Native American and white residents observed in 2000 may be subject to some inflation due to the relatively small size of the city's Native American population (329 in that year). In any case, the degree of dissimilarity between Native American and white residents fell dramatically from 2000 to 2010, registering as a low level of segregation in the latter year.

Table IV.21
Dissimilarity Index Values
The City of Cheyenne
Brown Longitudinal Tract Database, 2010 Census

	City of Casper		
Racial/Ethnic Dissimilarity Index	**1990**	**2000**	**2010**
Non-White/White	30.45	22.56	17.05
Black/White	26.53	24.33	21.41
Hispanic/White	50.23	25.34	18.81
Asian or Pacific Islander/White	12.01	18.36	11.70
Native/White	26.93	47.79	28.17

Regarding high segregation and integration by race/ethnicity, national origin, LEP group, and owner- and renter-occupied housing, there were no areas of segregation identified in the City of Cheyenne.

Historically, the level of segregation in the city declined in most cases between 1990 and 2000, and in all cases between 2000 and 2010. The Fair Housing Team has identified no trends, policies, or practices that are likely to contribute to higher segregation in the future.

Additional Information
No additional relevant information to report.

Contributing Factors of Segregation

Segregation has not been a prominent issue in the City of Cheyenne since 1990, according to the index of dissimilarity. The level of segregation between racial groups in the city declined in most cases between 1990 and 2000, and in all cases between 2000 and 2010. Currently, no groups in the city exhibit more than a low level of segregation from other groups.

THE STATE OF WYOMING

Included in Technical Appendix Section D is a series of maps detailing trends in segregation in counties throughout the state, as measured by the dissimilarity index. These maps demonstrate that, in most areas throughout the state, the level of segregation is low. In fact, the only county in which moderate or high levels of segregation were observed after 1990 was Fremont County, which includes the Wind River Reservation. Here the white and American Indian populations were observed to be highly segregated in each year, and the white and nonwhite populations were moderately segregated. While Fremont County had the largest American Indian population in the state, more than 70 percent of the county's residents were white.

The only other groups that were observed to be highly or moderately segregated at any point were the white and Asian/Pacific Islander populations of Crook, Johnson, and Lincoln Counties, and black and white populations of Platte County, in 1990. However, it is important

to bear in mind that dissimilarity index values can be inflated when the populations under consideration are very small. There were only 3 Asian residents living in Crook County in 1990, and the number of Asian/Pacific Islander residents of Johnson and Lincoln Counties at that time were 7 and 36, respectively. Similarly, there were 3 black residents living in Platte County in 1990. HUD suggests that caution is required when one of the populations numbers less than 1,000, and it would be inappropriate to conclude that the high Asian or Pacific Islander/White dissimilarity index values in those areas truly represents a high degree of segregation.

In fact, the white population was the only population that numbered more than 1,000 in a majority of counties throughout the state. In all of the years included in this study, only the counties of Albany, Fremont, and Laramie have included more than 1,000 black, Asian/Pacific Islander, or American Indian residents at any point. Dissimilarity index values based on these populations, which are theoretically *inflated* by low population figures, nevertheless demonstrate low levels of segregation in all of those counties except for Fremont, where a relatively high segregation levels are attributable to the presence of a tribal reservation. While the Hispanic population is larger than each of those populations, and exceeds 1,000 in a greater number of counties, the degree of segregation between Hispanic and white residents throughout the state is also low, as measured by the dissimilarity index.

Taken together, these data suggest that there is little residential segregation in the State of Wyoming as a whole, or in most of the counties throughout the state. This conclusion is borne out by analysis of dissimilarity indices for the state as a whole, based on county-level population figures and excluding Fremont County, as shown in Table IV.22 below.

Table IV.22
Dissimilarity Index Values by Area
The State of Wyoming and Sub-areas
2015 AFFH Raw Data

Non-Entitlement Area of Wyoming, Excluding Fremont County			
Racial/Ethnic Dissimilarity Index	**1990**	**2000**	**2010**
Non-White/White	15.27	13.81	13.19
Black/White	20.81	21.45	19.08
Hispanic/White	18.81	15.08	14.24
Asian or Pacific Islander/White	17.96	17.54	19.8
Native/White	20.08	20.71	21.61

As noted above, the only county in the state that has both a substantial number of nonwhite residents and a high level of segregation is Fremont County. In this county, a high level of segregation was observed between white and American Indian residents, as well as white and nonwhite residents (more than 70 percent of whom were American Indian). However, this degree of segregation is largely attributable to the presence of the Wind River Reservation, which contained roughly 90 percent of the American Indian population of Fremont County in 2010-2014.

There were no areas of relatively high segregation in the State of Wyoming, extending into other states or otherwise.

The Fair Housing Team has identified no trends, policies, or practices that are likely to contribute to higher segregation in the future. All Wyoming counties have experienced a low level of segregation since 1990, with the exception of Fremont County, where relatively high levels of segregation were observed between Native American and white residents, as well as between white residents and non-white residents. However, two-thirds of the population of Fremont County lives on the Wind River Reservation; land that is not under the jurisdiction of the State of Wyoming.

Additional Information

Map IV.5 and Map IV.6 below show concentration and segregation of residents in Casper, Cheyenne, and the State based on place of birth and Limited English Proficiency (LEP). As shown there, there are no appreciably large pockets in either of these two cities based on foreign place of birth, as the largest groupings in the state can be found by Mexican-born immigrants near the towns of Jackson and Rock Springs.

A similar pattern emerges with LEP residents in the state, as the highest concentrations of any language are those of Spanish speakers, with the largest clusters in Jackson and Rock Springs. There are small numbers of Spanish-speaking residents in both Casper and Cheyenne, but they are dispersed broadly across the two cities.

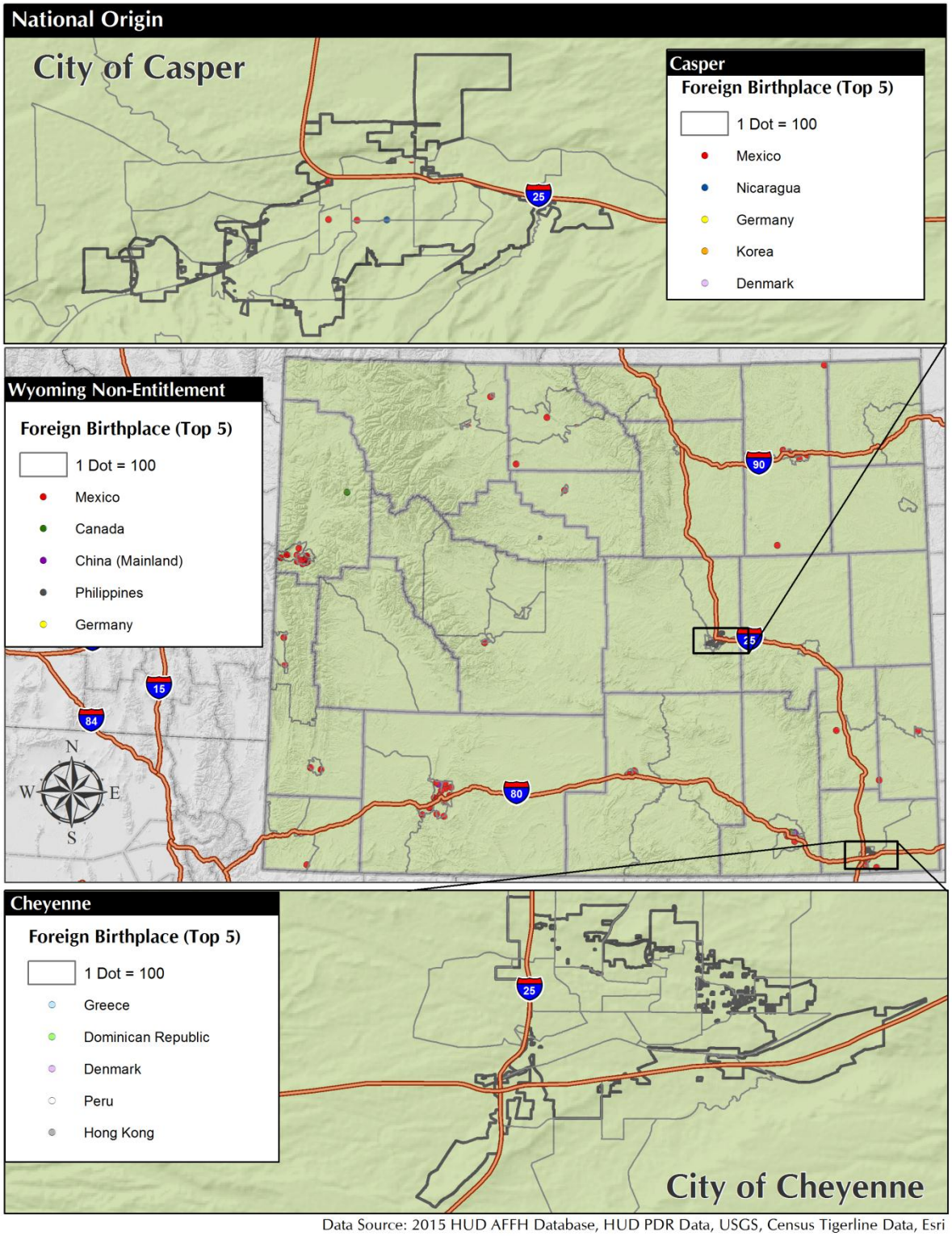
Owner-occupied housing in 2010 seems most common in areas with large populations of White residents in Casper, although Whites live in areas with slightly lower areas of owner-occupied housing in Cheyenne (see Map IV.7 on page 57). Other areas in southeastern Wyoming with the highest levels of owner-occupied housing contain large number of White residents.

Renter-occupied housing in 2010 is more prevalent in the western portion of the State, with large numbers of White residents living in these counties (see Map IV.8 on page 58). However, there are some Black and Hispanic residents living in areas with higher instances of rental-occupied housing in Casper, and even larger numbers of Black residents living in areas of high rental-occupied housing in Cheyenne.

Contributing Factors of Segregation

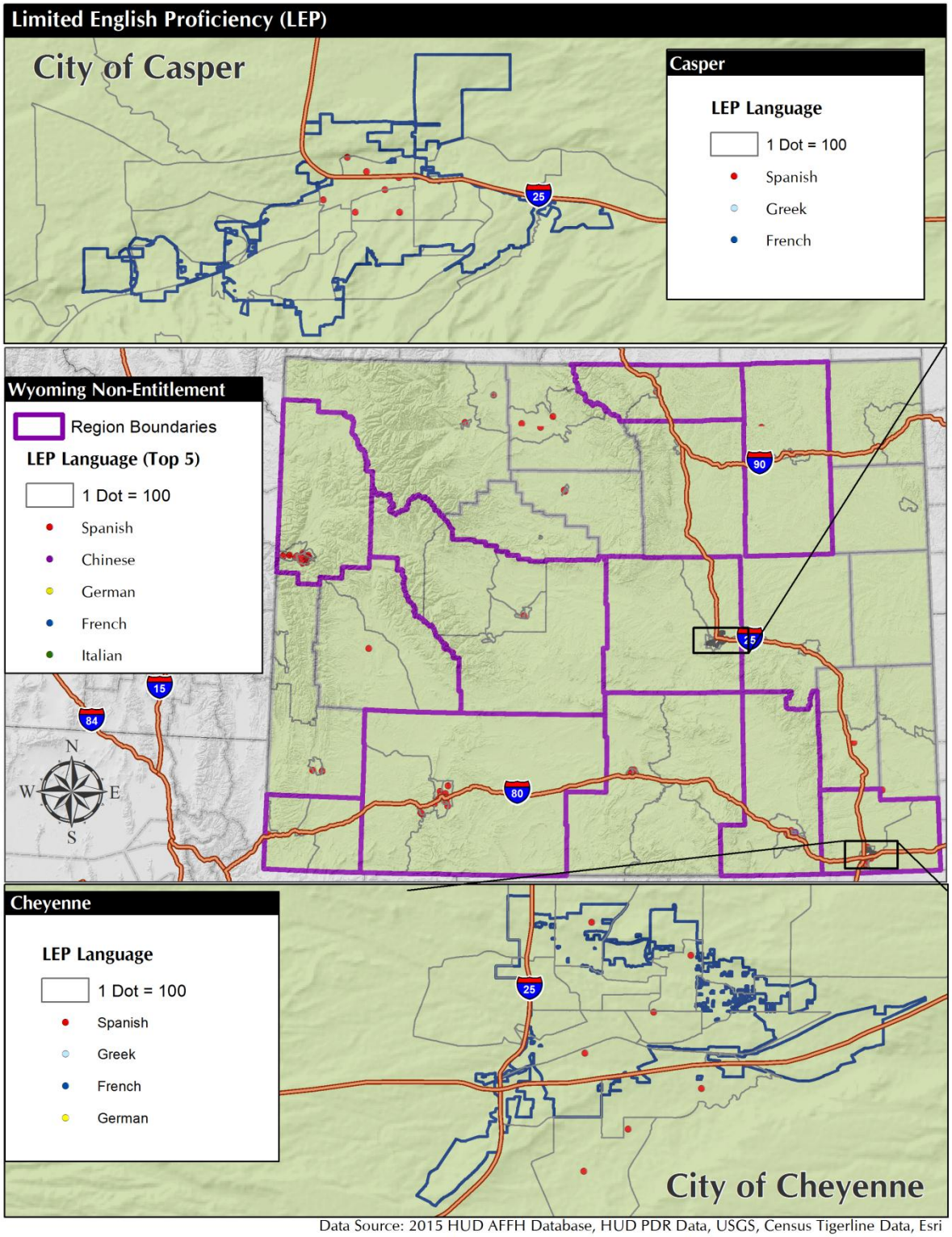
Segregation has not been a prominent issue in the State of Wyoming since at least 1990, according to the index of dissimilarity. All counties in the state reflect a low level of segregation with the exception of Fremont County. However, as noted above, two-thirds of the population of that county lives on land that is outside of the jurisdiction of the Wyoming Fair Housing Team.

Map IV.5
Residents' Foreign Place of Birth
2015 HUD AFFH Database



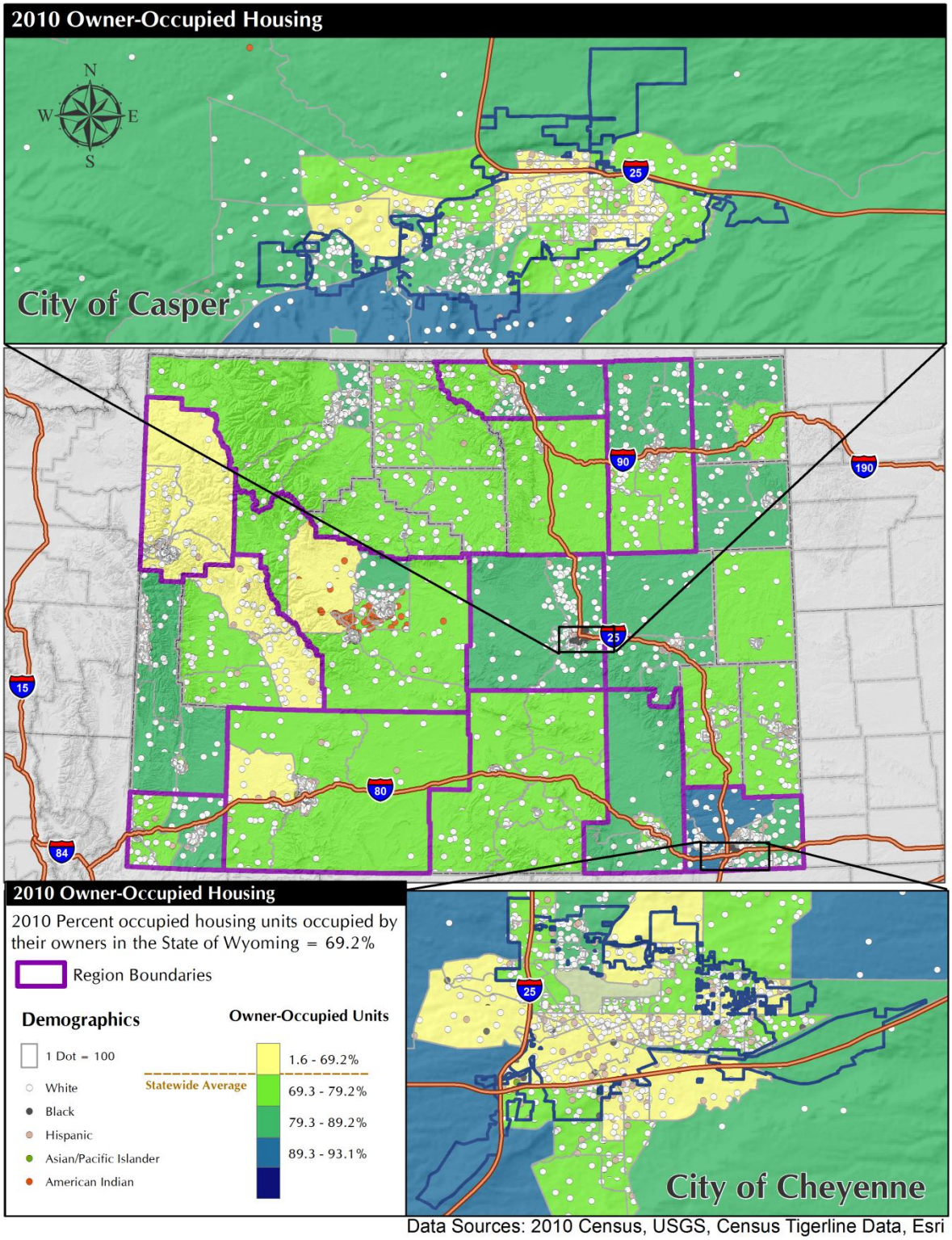
Data Source: 2015 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline Data, Esri

Map IV.6
Residents by Limited English Proficiency
2015 HUD AFFH Database



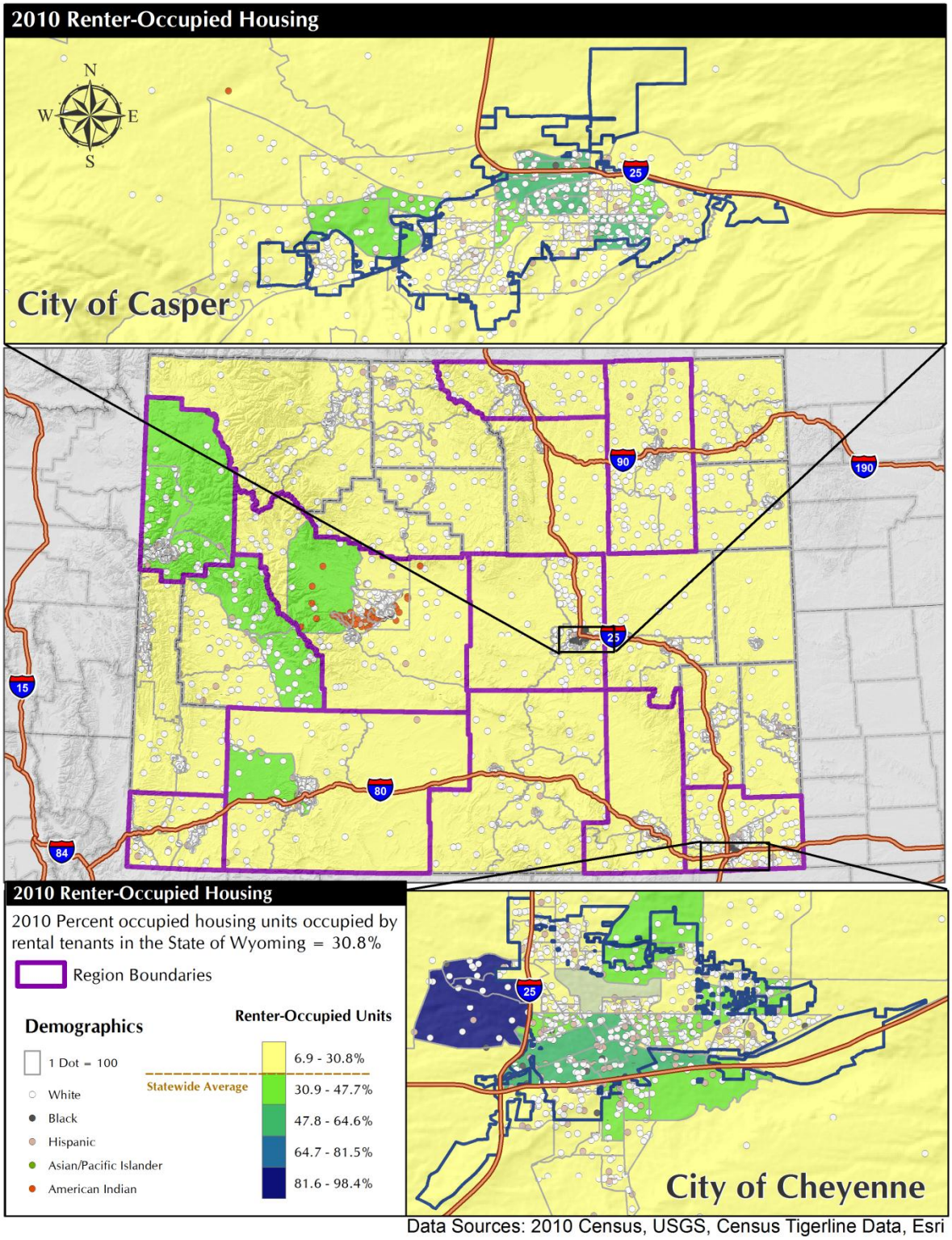
Data Source: 2015 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline Data, Esri

Map IV.7
2010 Owner-Occupied Housing with Racial/Ethnic Dot Density
2010 Census



Data Sources: 2010 Census, USGS, Census Tigerline Data, Esri

Map IV.8
2010 Renter-Occupied Housing with Racial/Ethnic Dot Density
2010 Census



Data Sources: 2010 Census, USGS, Census Tigerline Data, Esri

C: Racially/Ethnically Concentrated Areas of Poverty

Analysis

A Census tract is defined as a racially/ethnically concentrated area of poverty (R/ECAP) if two conditions are satisfied. First, the non-white population in the Census tract must represent a majority of the tract population. Second, the poverty rate in the Census tract must exceed either (a) 40 percent or (b) three times the overall poverty rate for the core-based statistical area (CBSA) in which the tract is located, whichever poverty threshold is lower. In areas outside of CBSAs, the racial/ethnic concentration threshold is set at 20 percent.

There were no areas in the state that met the definition of a racially/ethnically concentrated area of poverty (R/ECAP) in 2010, or in 1990 and 2000, as shown in Map IV.9, Map IV.10, and Map IV.11 in the following pages. Two conditions must be satisfied for a census tract to be considered an R/ECAP: Firstly, white, non-Hispanic residents must account for less than 50 percent of the tract population. Secondly, in more populated areas the poverty rate must exceed 40 percent, or three times the overall poverty rate for the entire area, whichever threshold is lower. In many rural areas, the poverty threshold is set at 20 percent.

There were no R/ECAPs in the State in 1990, 2000, or 2010.

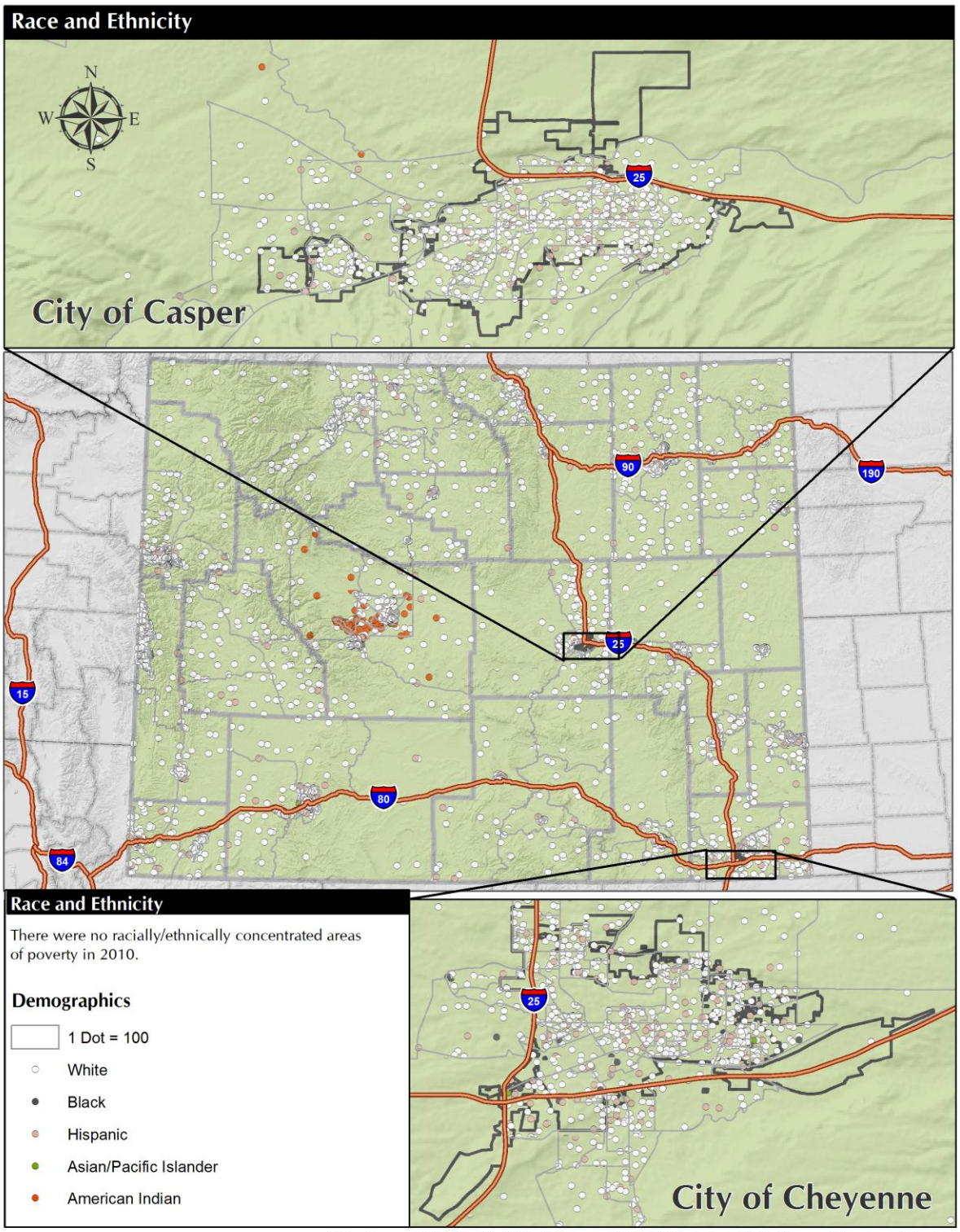
Additional Information

There were no R/ECAPs in the State in 1990, 2000, or 2010.

Contributing Factors of R/ECAPs

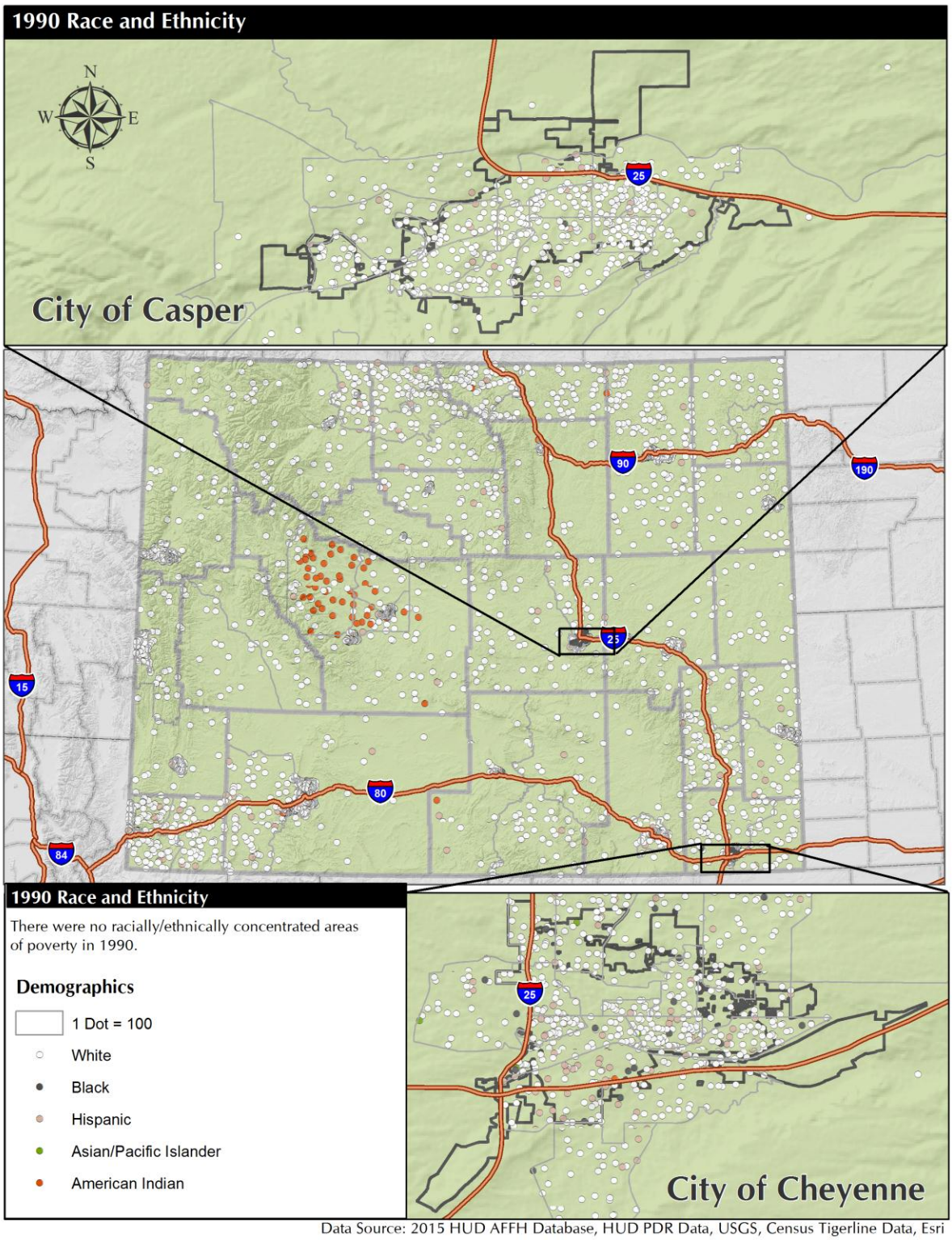
There were no R/ECAPs in the State in 1990, 2000, or 2010.

Map IV.9
Race and Ethnicity
The State of Wyoming and Entitlement Areas
2015 AFFH Raw Data



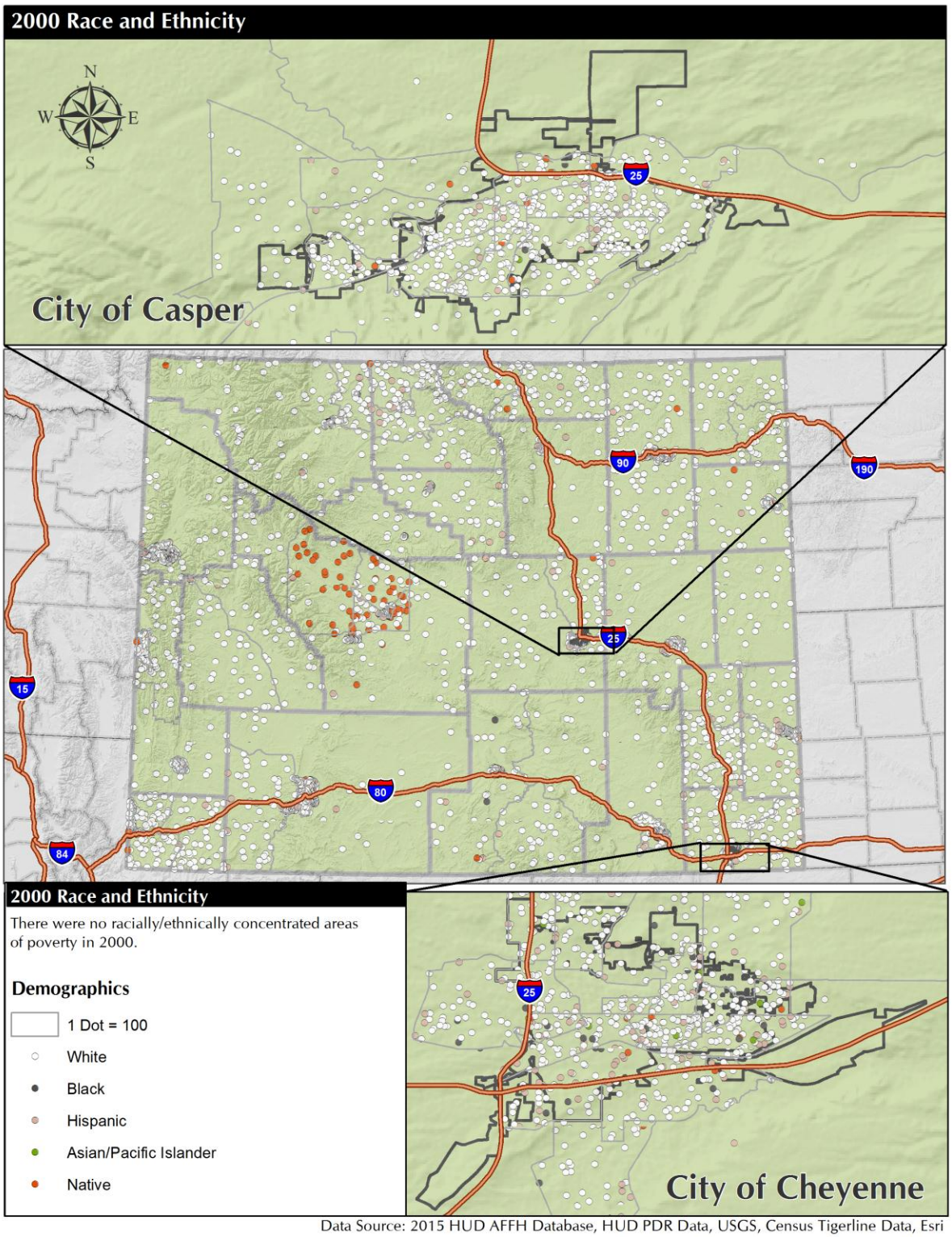
Data Source: 2015 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline Data, Esri

Map IV.10
Race and Ethnicity, 1990
The State of Wyoming and Entitlement Areas
2015 AFFH Raw Data



Data Source: 2015 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline Data, Esri

Map IV.11
Race and Ethnicity, 2000
The State of Wyoming and Entitlement Areas
2015 AFFH Raw Data



Data Source: 2015 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline Data, Esri

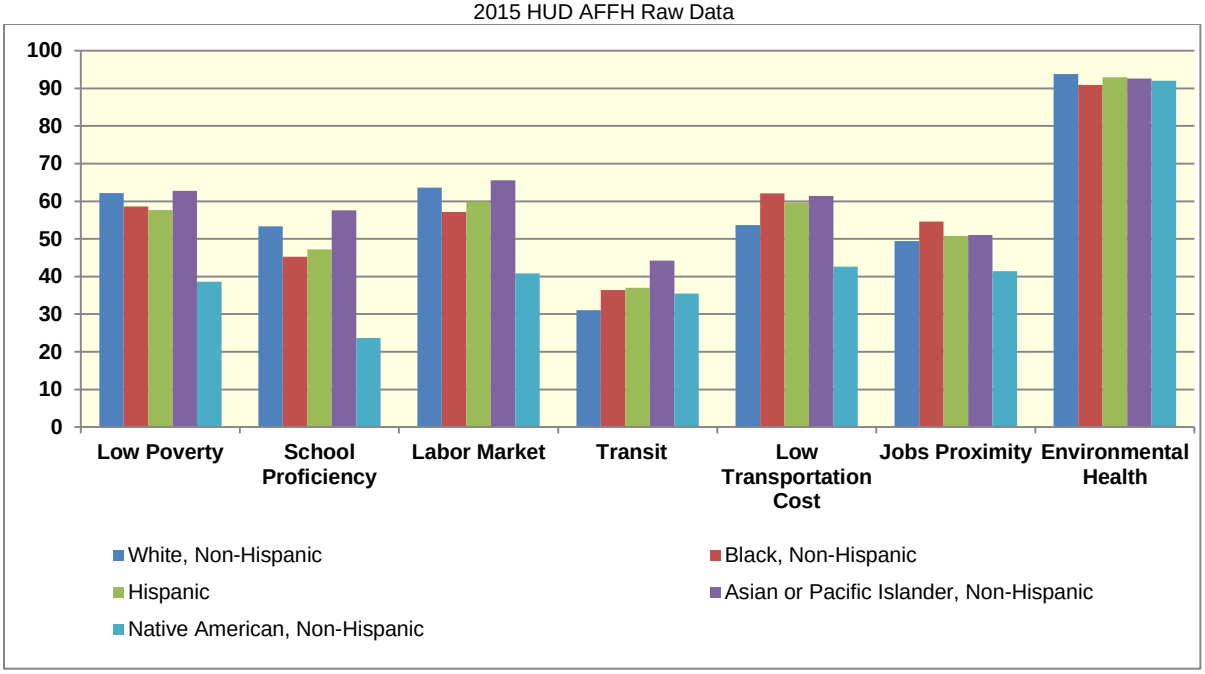
D: Disparities in Access to Opportunity

Analysis

The analysis of access to opportunity throughout the state, as measured by the HUD-provided indices, did not reveal notable disparities in access to opportunity by race/ethnicity, national origin, or familial status. Owing in part to the wide variation in population densities throughout the state, there was some variation in index values by block group or Census tract. However, neither a geographic analysis comparing the distribution of residents by race/ethnicity, national origin, or family status nor aggregate analysis of opportunity by race or ethnicity revealed any substantial differences in opportunity index values throughout the state in most cases.

The only exception was among Native American residents, who saw markedly lower opportunity index values than other racial or ethnic groups throughout the state, as shown in Diagram IV.1 below.

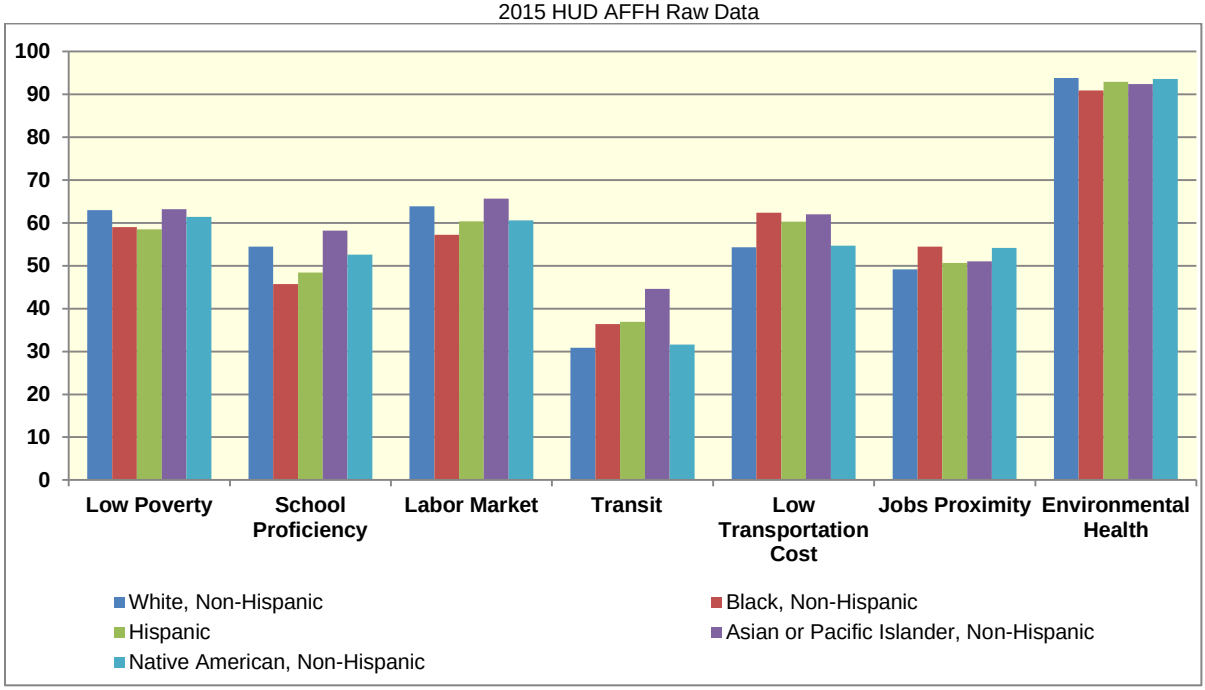
Diagram IV.1
Opportunity Index Values by Race
The State of Wyoming
2015 HUD AFFH Raw Data



However, that exception was attributable to the inclusion of Fremont County in state-level opportunity index figures. Around two-thirds of the county's population lives on the sovereign-nation lands of the Wind River Reservation as of 2010, and a majority of the state's Native American population lived on the reservation in that year.[3] When Fremont County is excluded from the calculation of state-level index figures, the discrepancy between Native American residents and other racial groups largely disappears, as shown in Diagram IV.2 on the following page.

[3] U.S. Census Bureau, 2010 Census. Approximately 58 percent of Native American residents throughout the state lived within the Wind River Census County Division (CCD).

Diagram IV.2
Opportunity Index Values by Race
The State of Wyoming, excl. Fremont County
2015 HUD AFFH Raw Data



a) Educational Opportunities

The mission and vision of the Wyoming Department of Education is to significantly increase the percentage of Wyoming Students that are College, Career, and Military Ready by 2020. In service of that mission and vision, the State is currently focusing on five areas: increasing the statewide accreditation score, increasing involvement in career and technical education (CTE) pathways, increasing involvement in the Hathaway Success Curriculum[4], increasing third grade reading proficiency, and increasing involvement with online learning opportunities.

In addition to core educational activities and resources, and in furtherance of the goals described above, the Wyoming Department of Education provides additional assistance through a variety of grant programs. The following narrative offers an overview of selected programs and activities funded through these grants.

Distance Education Grant

To promote greater equity of access and opportunity for achievement, and in order to ensure increased choice and flexibility within the state for Wyoming students, the Wyoming Department of Education offers the Distance Education Grant to eligible school districts, community colleges, and the University of Wyoming. The purposes of the Grant are to develop and sustain K-12 distance education courses, and to increase the availability of high quality distance education courses, increase student participation in distance learning courses, and to

[4] Hathaway Scholarships are intended to provide incentives for Wyoming students to prepare for and pursue post-secondary education.

ensure that every student has equal access to core courses, the Hathaway Success Curriculum, Dual Enrollment, or Advanced Placement coursework.[5]

Career and Technical Education Continuing Development Grant

The Wyoming Department of Education has dedicated a portion of funding it receives under the Carl D. Perkins Act of 2006 to help provide professional development programs for career and technical education (CTE) professionals, including teachers, faculty, administrators, and counselors. CTE Grant Funding, which is intended to provide "high-quality, sustained, intensive, and classroom-focused" training, may be used to send CTE professionals to state or national conferences, training or technical assistance, developing career pathways, integrating academics and CTE, and federal accountability and reporting requirements for Perkins, among other activities. It may also be used to bring speakers or trainers to local schools for CTE training.

Math and Science Partnerships

Math and Science Partnership Grants are designed to pair institutions of higher education with high-need school districts in order to improve the quality of science, technology, engineering, and mathematics (STEM) courses in those districts. The purposes of these partnerships are to improve teacher content knowledge and skill; foster continuing education of STEM teachers in their subject areas; bring math and science teachers together with scientists, mathematicians, and engineers; develop more rigorous curricula; and improve and expand the training of mathematics and science teachers.

Wyoming Bridges Grant

The Bridges Program provides funding to school districts that enables those districts to provide intervention and remediation programs outside of school hours, including summer school and extended day programs. Funds are provided in the form of formula grants, which are awarded based on a proxy of at-risk students.[6]

Temporary Assistance for Needy Families

Recognizing the importance of getting an early start to learning, the Wyoming Department of Education offers grant funding to provide preschool programs for economically disadvantaged students, in partnership with the Wyoming Department of Family Services.[7]

GEAR UP Wyoming

The Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP) grant is designed to help low-income, at-risk Wyoming students better prepare for postsecondary education. The objective of the program is to increase the number of low-income students who

[5] Distance Education Grant: 2016-2017 Request for Proposals.
[6] For more information, see "Wyoming Bridges Grant." Accessed September 20, 2016. Wyoming Department of Education website. https://edu.wyoming.gov/beyond-the-classroom/grants/wyoming-bridges/
[7] "Temporary Assistance for Needy Families (TANF) Preschool Partnership Grants." Accessed September 20, 2016. Wyoming Department of Education website. Accessed https://edu.wyoming.gov/beyond-the-classroom/grants/early-childhood/.

graduate high school and attend a postsecondary institution (e.g., university or community college) by improving their academic achievement, raising their academic aspirations, and increasing their awareness of options for enrolling in higher education. The program accomplishes these goals by providing approximately $7.1 million in grant funding and matching funds for academic support, college preparation, and family services through each of the state's seven community colleges and providing for educator training and school improvement initiatives.[8]

As noted above, there was little to no relationship between higher or lower school proficiency index values and the race, ethnicity, national origin, or family status of state residents. Map IV.12 on the following page presents the distribution of access to education by block group, along with the population by race and ethnicity. Map IV.13 on page 68 presents the distribution of opportunity compared with the distribution of residents by foreign place of birth. Map IV.14 on page 69 presents the distribution of educational opportunity compared with the distribution of families in the state, by size.

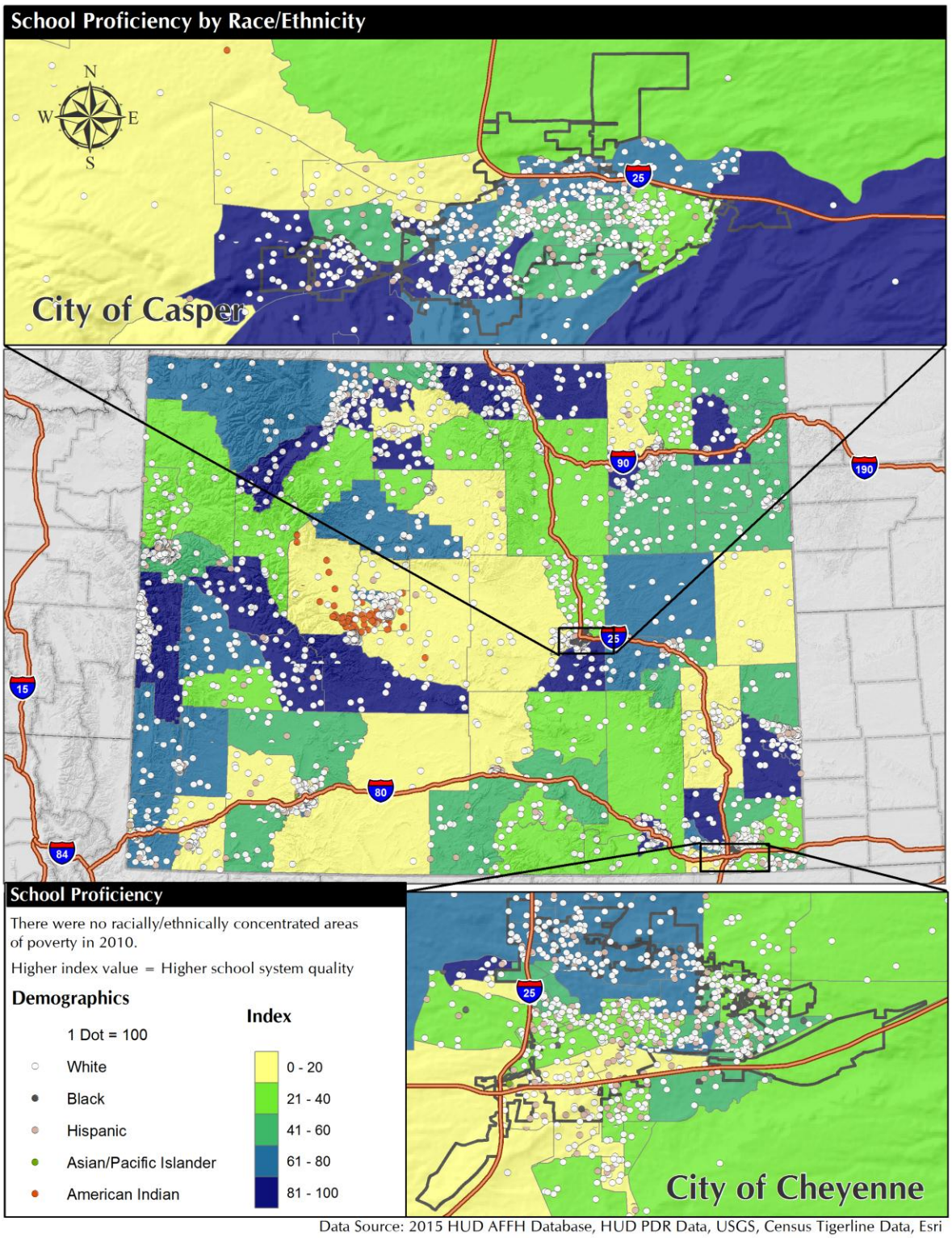
There was little to no relationship between higher or lower school proficiency index values and the geographic distribution of residents by race/ethnicity, national origin, or family status.

In many areas of the state, Wyoming schoolchildren may attend any school within a given town, and are not limited to attendance at in-district schools.

As noted above, there were no marked disparities observed between protected classes in terms of access to proficient schools.

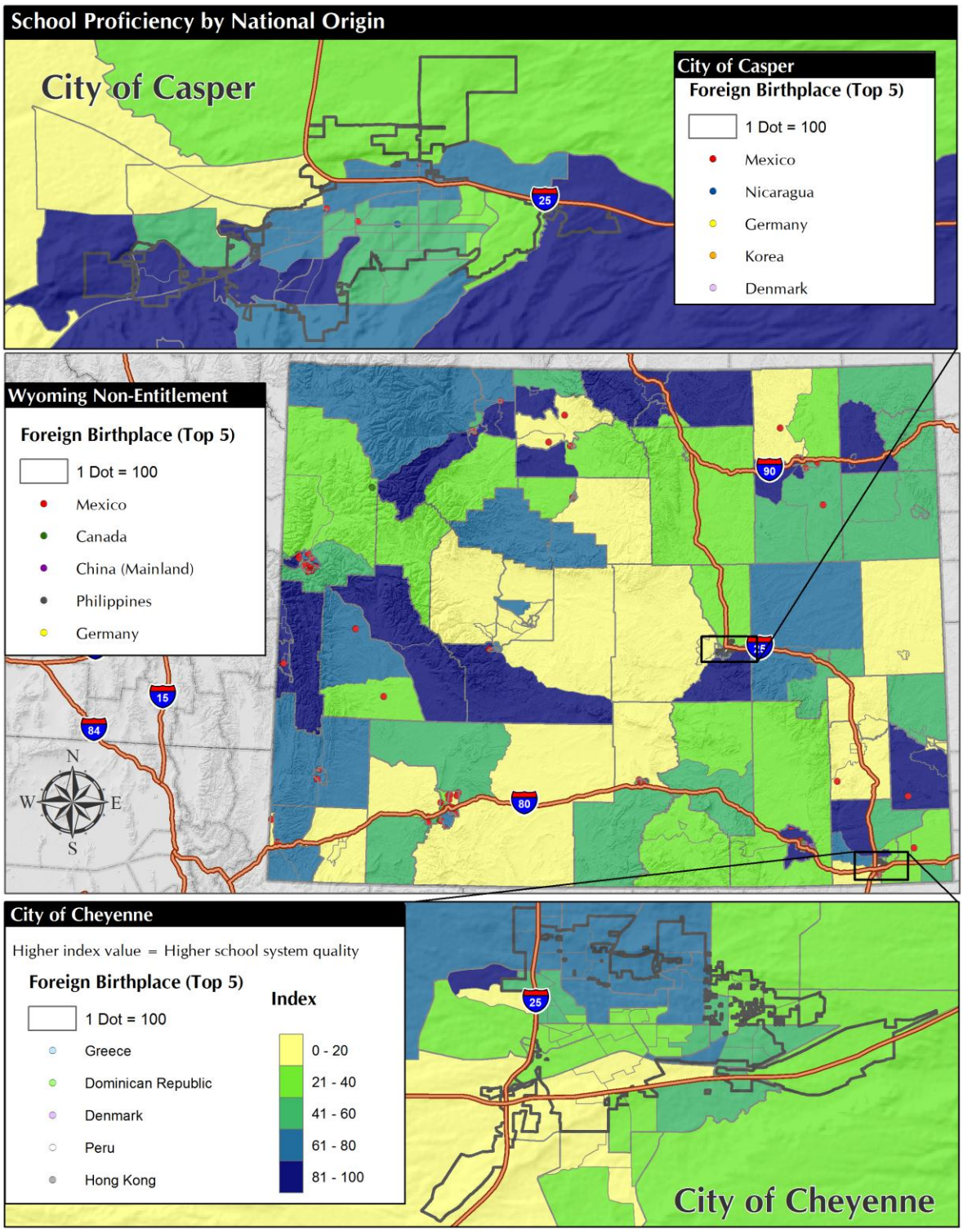
[8] "Welcome to GEAR UP Wyoming!" University of Wyoming website.

Map IV.12
School Proficiency Index and Race/Ethnicity
The State of Wyoming and Entitlement Areas
2015 AFFH Raw Data



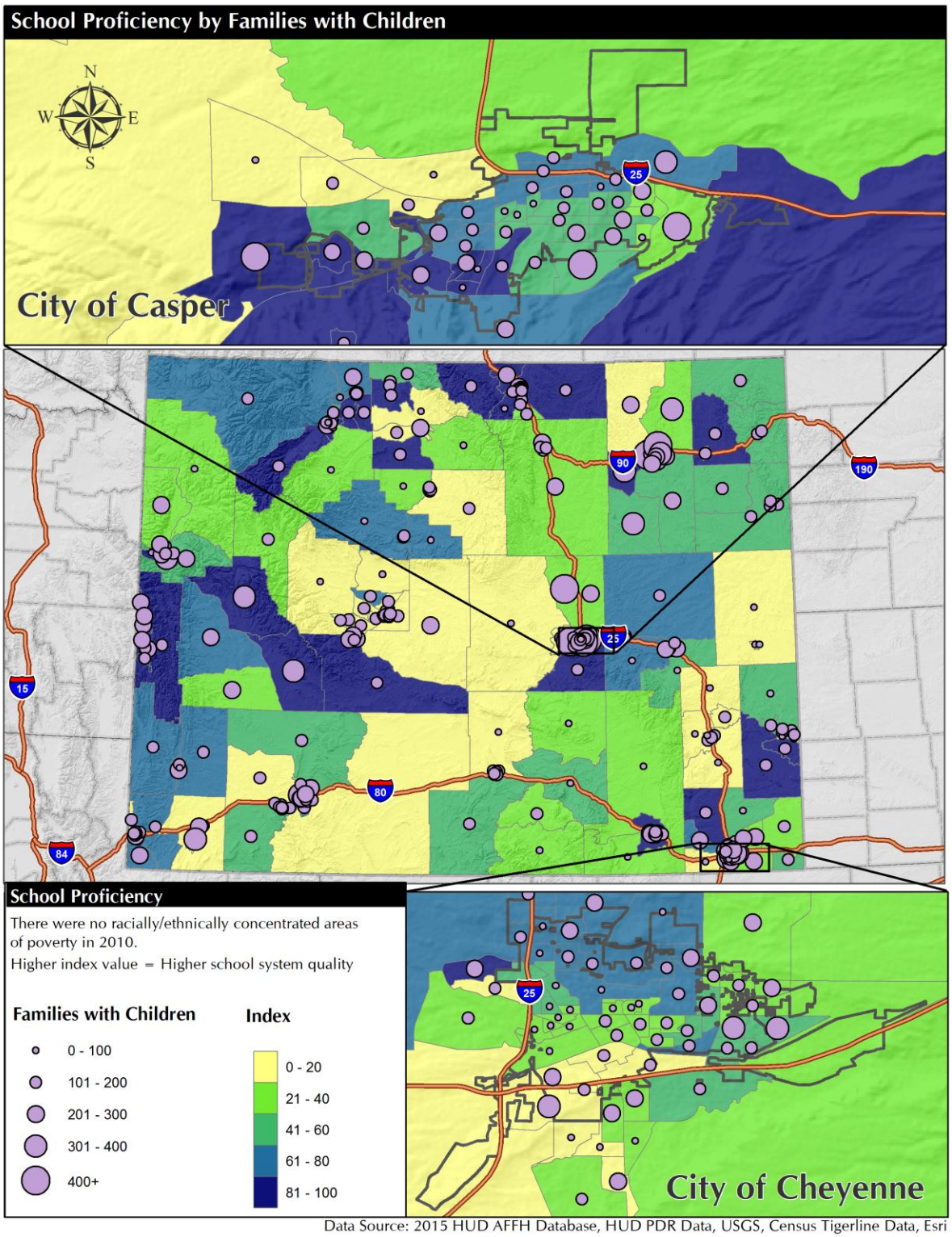
Data Source: 2015 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline Data, Esri

Map IV.13
School Proficiency Index and National Origin (Foreign Place of Birth)
The State of Wyoming and Entitlement Areas
2015 AFFH Raw Data



Data Source: 2015 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline Data, Esri

Map IV.14
School Proficiency Index and Families with Children
The State of Wyoming and Entitlement Areas
2015 AFFH Raw Data



Data Source: 2015 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline Data, Esri

b) **Employment**

The Wyoming Department of Workforce Services (WDWS) is dedicated to the development of a workforce that is responsive and adaptive to the changing state economy. Through the Office of the Director, the Office of Workforce Programs, and the Office of Standards and Compliance, the WDWS works to promote access to employment for Wyoming's residents.

In its 2012-2016 State Integrated Workforce Plan, the WDWS provided an assessment of the state's labor market and economy, and prioritized activities to streamline government, enhance the value of the state's major industries while diversifying the economy, and promote the integration of Wyoming into the global economy.

The WDWS also highlighted a range of activities designed to promote employment among targeted groups, including low-income individuals, parents with children, adults and youth, and workers with disabilities. Through the Personal Opportunities with Employment and Responsibility (POWER) program, the WDWS partners with the Wyoming Department of Family Services to help low-income families toward self-sufficiency through assistance with childcare and job preparation.

Low-income parents also receive assistance through the Temporary Assistance for Needy Families (TANF) Employment and Training for Self-Sufficiency Program. Support and assistance is available to low-income, single fathers through the DADS Making a Difference program, while low-income, single mothers are assisted by a partnership of the WDWS and CLIMB, which assists with job training and placement.

The Division of Vocational Rehabilitation partners with the Employment and Training Division to pay for job training for workers in the state, including workers with disabilities, and partners with Northwest Community Action Programs (NOWCAP) to promote employment opportunities for workers with developmental disabilities and brain injuries. In addition, the WDWS uses Work Opportunity Tax Credits to encourage employers to hire individuals who face barriers to employment, including workers with disabilities.[9]

Workforce Development Training Fund

The Department of Workforce Services administers the Workforce Development Training Fund, which is financed through an appropriation of State General Funds and interest earned from the Unemployment Insurance Trust Fund.[10] In 2014 the Fund approved 1,974 Business Training Grant applications and 11 Pre-Hire Economic Development Grants. Business Training Grants, which totaled nearly $3.6 million, went primarily to the state's small businesses. Pre-Hire Economic Development Grants, which totaled approximately $785,733, were used to support training for nearly 1,800 individuals across 5 major industries:

- Business management;
- Construction and extraction;

[9] "State Integrated Workforce Plan for the Workforce Investment Act Title I/Wagner Peyser Act and Department of Labor Workforce Programs." Wyoming Department of Workforce Services. The Plan is effective from 2012 through 2016.
[10] "Workforce Development Training Fund: 2014 Annual Report." The Department of Workforce Services. Accessed September 20, 2016 at http://www.wyomingworkforce.org/_docs/wdtf/ar/2014-Annual-Report.pdf.

- Installation, maintenance, and repair;
- Technology; and
- Hospitality and Tourism.

A majority of individuals who benefited from training provided through Pre-Hire Economic Development Grants worked in hospitality and tourism.

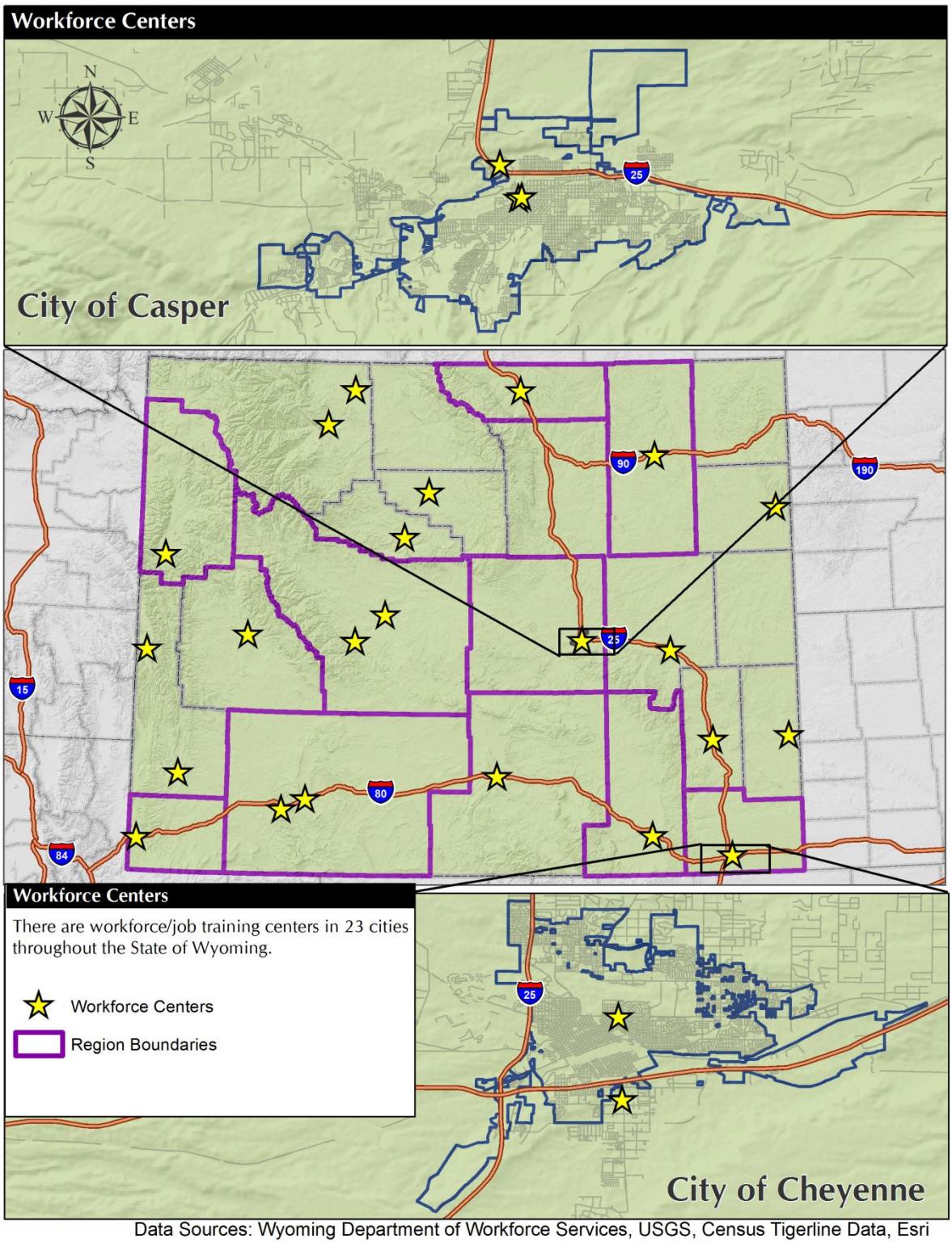
Job training centers in the state are required to offer training services for Wyoming's adult, dislocated workers, and youth workforces, including Veterans, recipients of public assistance, individuals with disabilities, older workers, migrant and seasonal farmworkers, and others who need assistance.[11] Job training centers are located in 23 cities throughout the state. Approximately 82 percent of the population lives within 10 miles of a training center, 91 percent lives within 25 miles of a training center, and 99 percent lives within 50 miles of a training center.[12] The location of workforce/training centers throughout the State is presented in Map IV.15 on the following page.

As noted above, HUD provided maps and data concerning job proximity and labor market engagement did not reveal any substantial discrepancies in access to employment and labor markets by protected class, except in Fremont County, home to the Wind River Reservation. Map IV.16 on page 73 presents the distribution of access to employment by block group, along with the population by race and ethnicity. Map IV.17 on page 74 presents the distribution of employment opportunities compared with the distribution of residents by foreign place of birth. Map IV.18 on page 75 presents the distribution of employment opportunity compared with the distribution of families in the state, by size. The three maps beginning with Map IV.19 on page 76 show the Labor Market Engagement Index for these same three protected classes.

When the population of Fremont County is included in state-level analyses of access to opportunity, the American Indian population is shown to have considerably lower access to opportunity than other racial groups across most of the indexes included in the study, including the job proximity and labor market engagement indices. However, two-thirds of the county population lives on the sovereign land of the Wind River Reservation, along with a majority of the state's Native American population. When Fremont County is excluded from the analysis, discrepancies in access to employment and labor markets between Native American residents and other groups disappear.

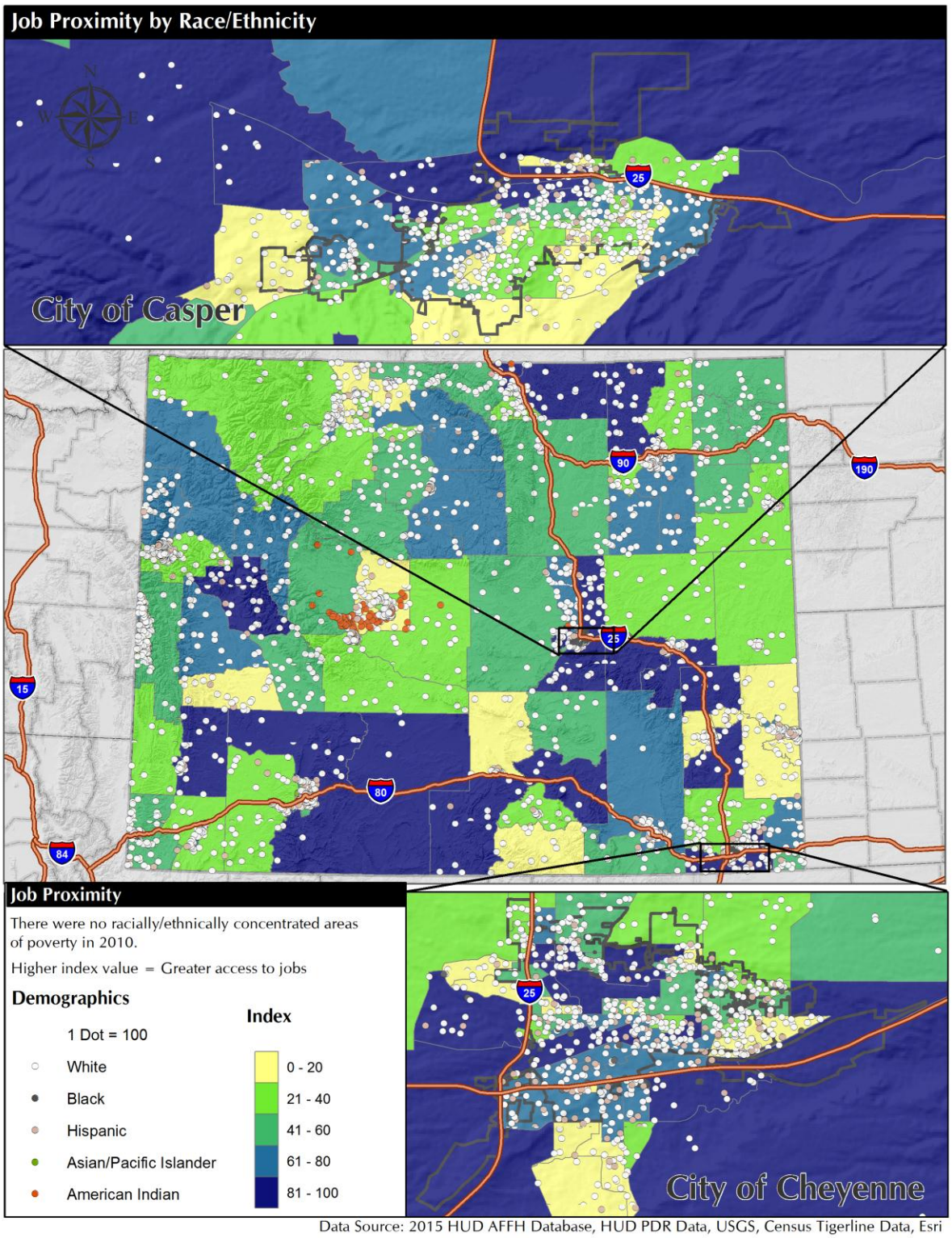
[11] "State Integrated Workforce Plan for the Workforce Investment Act Title I/Wagner Peyser Act and Department of Labor Workforce Programs." Wyoming Department of Workforce Services. The Plan is effective from 2012 through 2016.
[12] Estimates based on 2010 population figures.

Map IV.15
Workforce Centers by Location
The State of Wyoming and Entitlement Areas
2016 Wyoming Department of Workforce Services



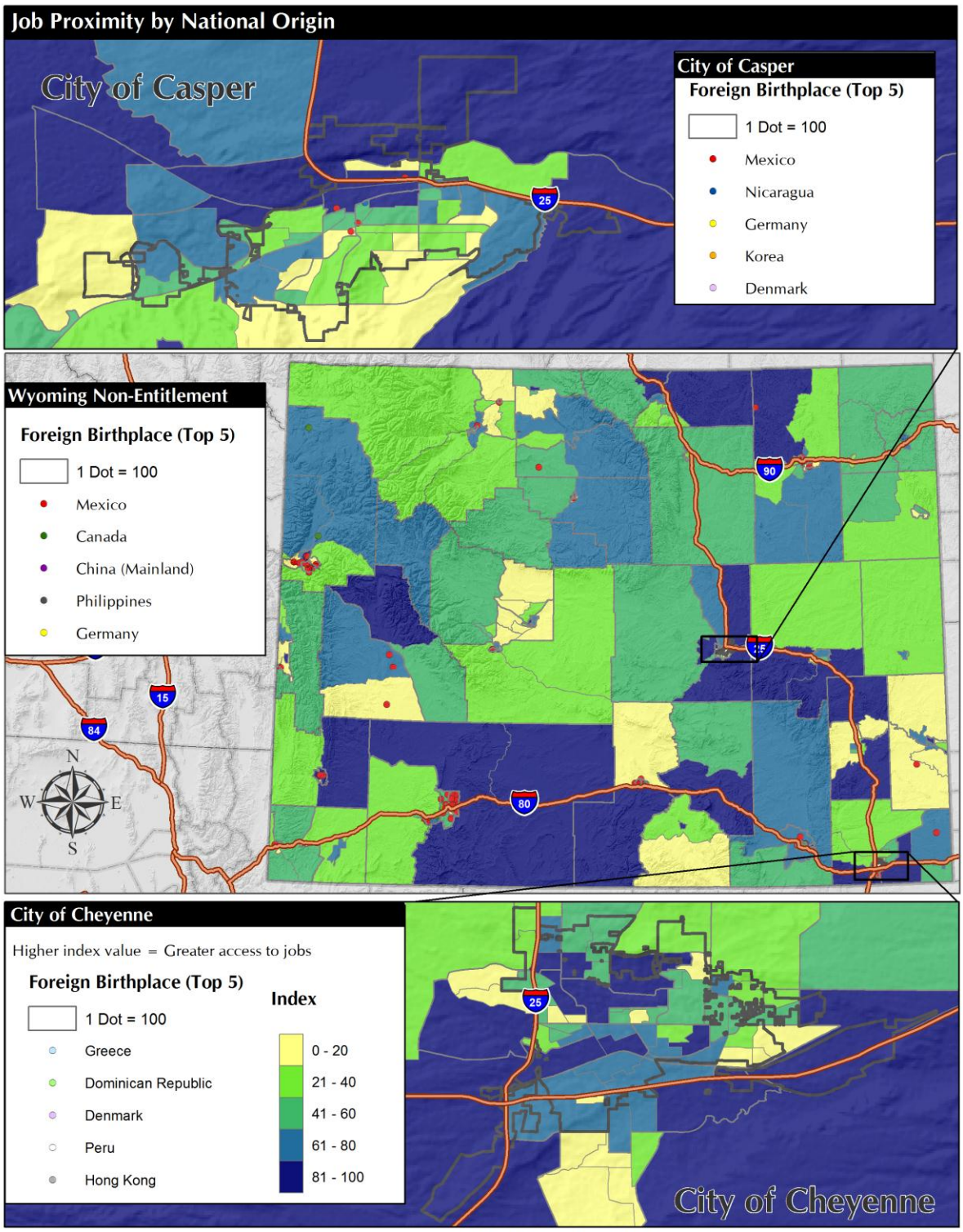
Data Sources: Wyoming Department of Workforce Services, USGS, Census Tigerline Data, Esri

Map IV.16
Job Proximity Index and Race/Ethnicity
The State of Wyoming and Entitlement Areas
2015 AFFH Raw Data



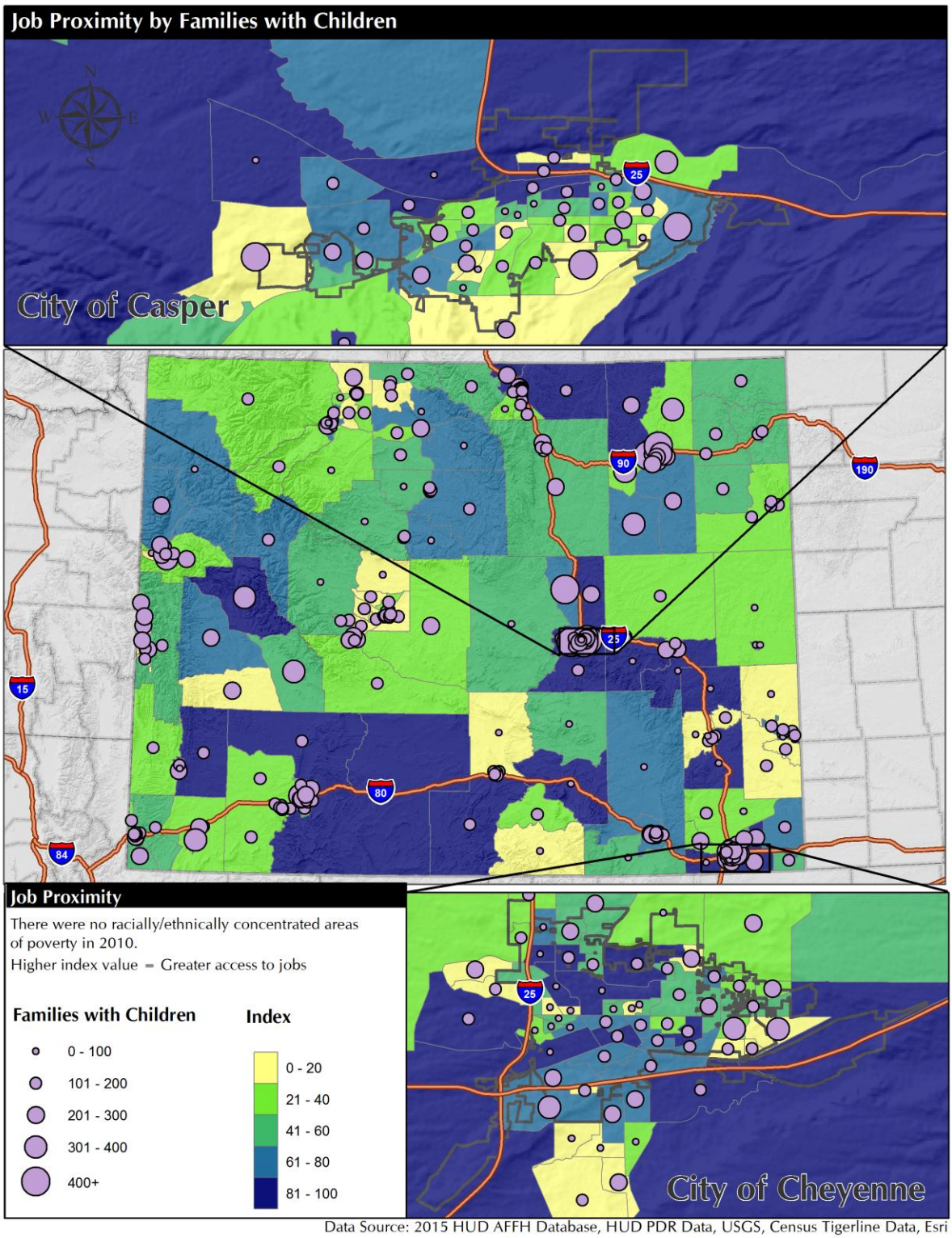
Data Source: 2015 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline Data, Esri

Map IV.17
Job Proximity Index and National Origin (Foreign Place of Birth)
The State of Wyoming and Entitlement Areas
2015 AFFH Raw Data



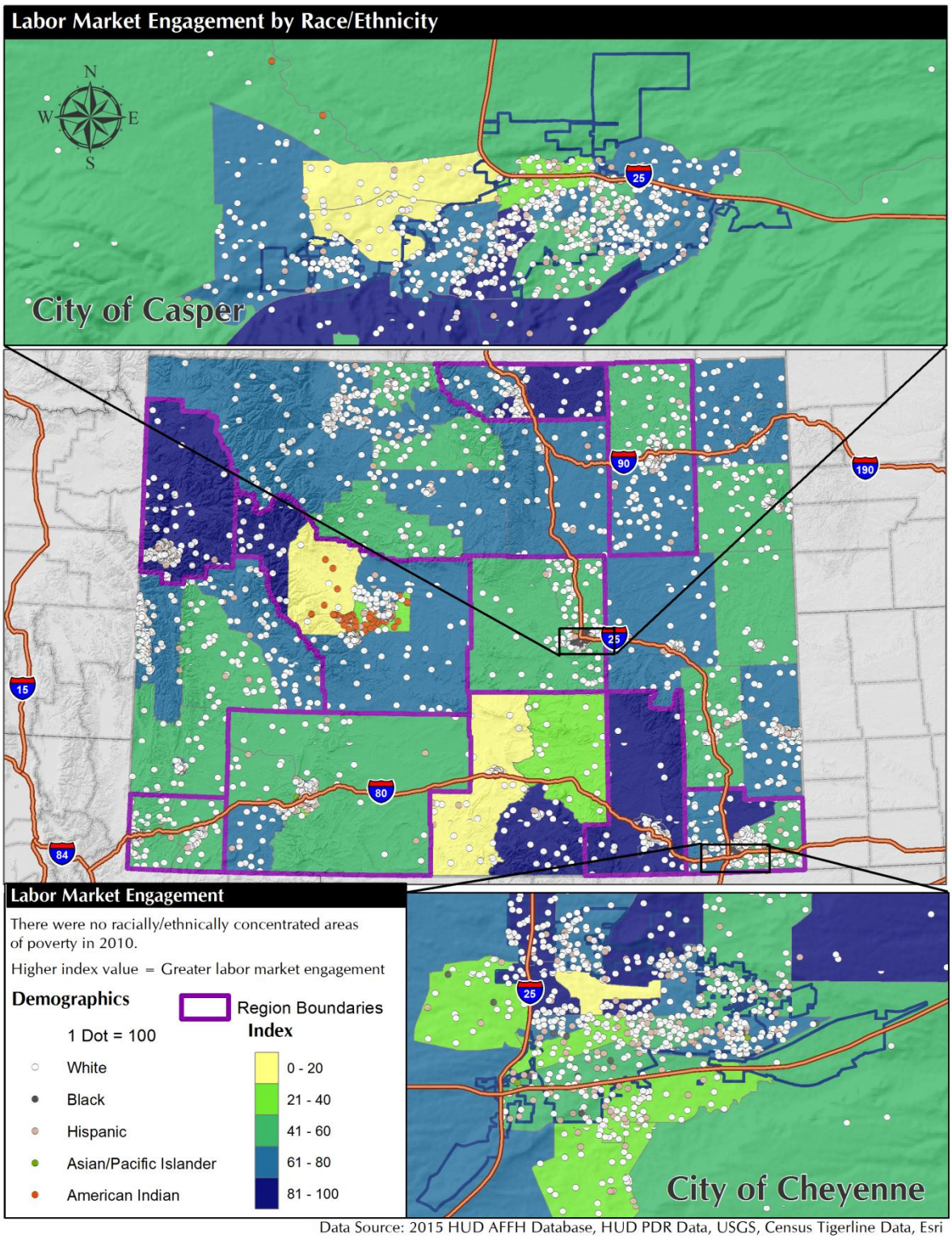
Data Source: 2015 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline Data, Esri

Map IV.18
Job Proximity Index and Families with Children
The State of Wyoming and Entitlement Areas
2015 AFFH Raw Data



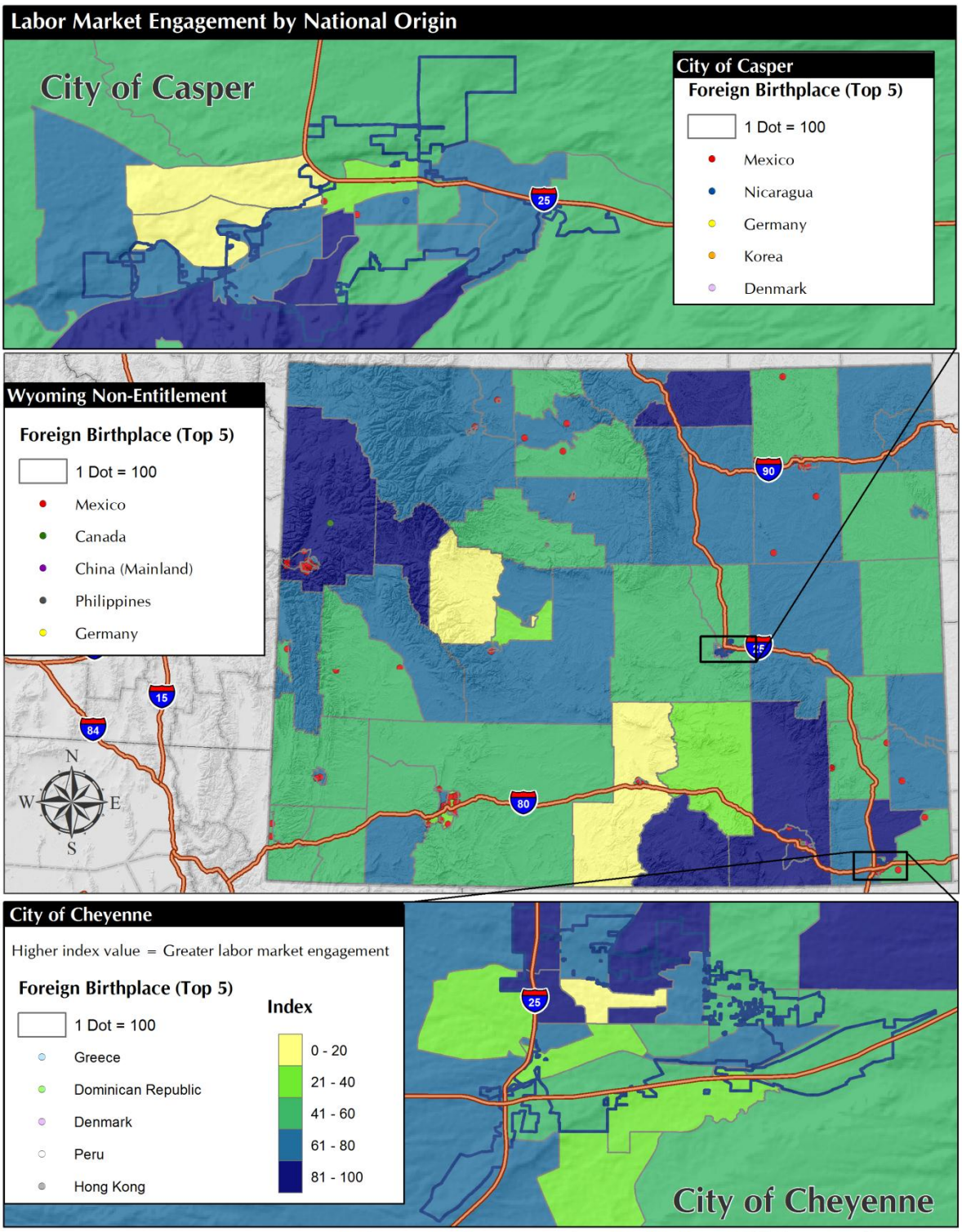
Data Source: 2015 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline Data, Esri

Map IV.19
Labor Market Engagement Index and Race/Ethnicity
The State of Wyoming and Entitlement Areas
2015 AFFH Raw Data



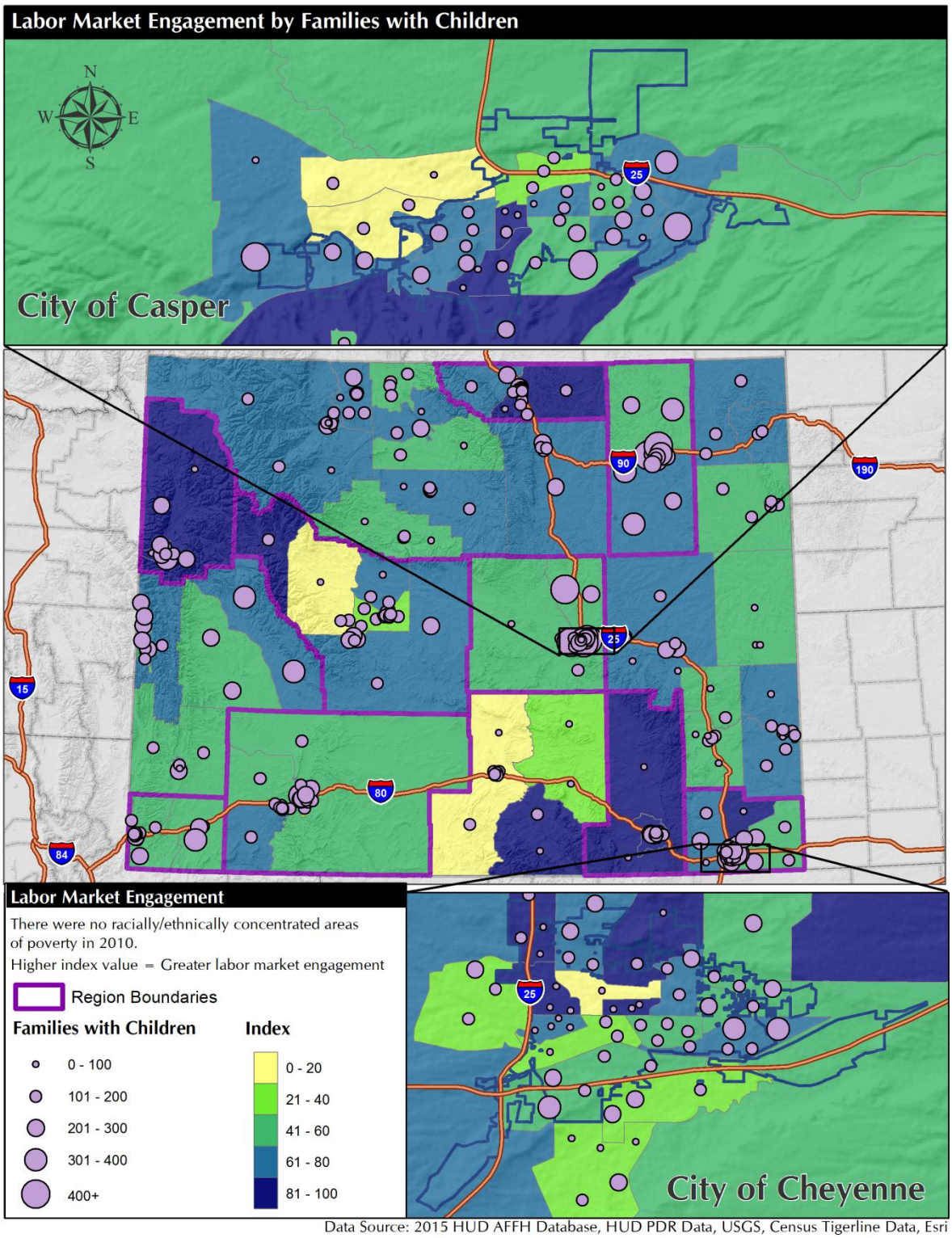
Data Source: 2015 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline Data, Esri

Map IV.20
Labor Market Engagement Index and National Origin (Foreign Place of Birth)
The State of Wyoming and Entitlement Areas
2015 AFFH Raw Data



Data Source: 2015 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline Data, Esri

Map IV.21
Labor Market Engagement Index and Families with Children
The State of Wyoming and Entitlement Areas
2015 AFFH Raw Data



Data Source: 2015 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline Data, Esri

c) Transportation

To support transportation planning and to address transportation issues in Wyoming, the Wyoming Department of Transportation (WYDOT) interacts continually with county, city, and town governments throughout the state. The Local Government Coordination Section (LGC) in Cheyenne coordinates with the WYDOT's off-system and local programs, public transit programs, and cooperative agreements.[13]

The WYDOT works to improve and promote access to public transportation through the Rural Public Transit Program, the Urbanized Area Formula Assistance Program, Elderly and Persons with Disabilities, Metropolitan and Statewide Planning, New Freedoms, Intercity Bus, Rural Transit Assistance Program, the Transportation Enterprise Fund, Public Transportation on Indian Reservations, and Job Access Reverse Commute. The following narrative, adapted from the WYDOT "Transportation Programs" book, provides an overview of each program or activity. Funding sources or authorizing legislation are presented in parentheses. A majority of these programs operate with funding from the Federal Transportation Administration (FTA).

Rural Public Transit Program (FTA §5311 and the State Transit Program)

The Rural Public Transit Program provides state funding and federal formula grants to support development, maintenance, and improvement of public transportation in rural and small urban areas. The WYDOT administers Federal Transit Administration (FTA) Section 5311 and for rural transportation projects in areas with populations under 50,000. State Transit funds, authorized by the Wyoming Legislature supplement the FTA Sec. 5311 program funds, and are also available to Cheyenne and Casper (Wyoming's two "urban" communities).[14]

Urbanized Area Formula Assistance Program (FTA §5307)

The Urbanized Public Transit Program (FTA Section 5307) provides formula grants to states to support the development, maintenance, and improvement of public transportation in the state's urban areas. Annually the allocations to Casper and Cheyenne are distributed on a population ratio and approved by the Governor.[15]

Elderly and Persons with Disabilities (FTA §5310)

The WYDOT directs federal funding to private non-profit organizations and public bodies to purchase vehicles and related transit equipment for the provision of special transportation services for the elderly and persons with disabilities. Generally, Sec. 5310 funding is used to acquire or repair lift or ramp equipped vehicles to insure access to for persons with disabilities. In larger transit programs, Sec. 5310 funding is used to acquire or repair transit vehicles used in "paratransit" service, a more specialized service which compliments fixed route service.[16]

[13] "Local Government Transportation Programs." Wyoming Department of Transportation website.
[14] "Transportation Programs." The Wyoming Department of Transportation: Office of Local Government Coordination. P. 32.
[15] *Ibid.* P. 35.
[16] *Ibid.* P. 37

Metropolitan and State Planning Programs (FTA §5303 & 5304)

Metropolitan planning funds (Section 5303) are provided to Casper and Cheyenne and are annually a part of their apportionment. WYDOT is only involved as a "reviewer" for these monies. Statewide planning (Section 5304) in Wyoming is generally placed in a Consolidated planning program and is added to state planning funds and made available to both municipalities and small rural areas for their planning needs.[17]

New Freedoms (FTA §5317)

Funding under the New Freedoms is presently disbursed to Wyoming Independent Living organizations to utilize in their statewide check/voucher program. Without this program, many transportation-dependent individuals in Wyoming would be unable to access many of the services and social activities that are routinely available to the general public.[18]

Intercity Bus Projects (FTA §5311(f))

In Wyoming, intercity bus service provides a vital link between otherwise isolated rural and small urban communities and the rest of the state, and to nearby urban areas. One objective of funding for intercity bus service is to support the connection between non-urbanized areas and the larger regional or national system of intercity bus service. Another objective is to support services to meet the intercity travel needs of residents in non-urbanized areas. A third objective is to support the infrastructure of the intercity bus network through planning and marketing assistance and capital investment in facilities.[19]

Rural Transit Assistance Program (FTA §5311(b)(3))

RTAP funds are annually allocated to WYDOT and contracted out with WYTRANS, the statewide organization of community transit providers, to provide training, technical assistance, drug and alcohol testing program administration and to print and distribute the newsletter, Transit Express.[20]

Transportation Enterprise Fund (State Transportation Trust Fund)

Wyoming's Transportation Enterprise Fund is administered by the State Loan and Investment Board (SLIB). Applications are submitted annually and are reviewed by the SLIB staff, along with recommendations from WYDOT-LGC – transit staff. Project recommendations are developed with the assistance of WYDOT-LGC's Transit Vehicle Inventory Database.

The Transportation Enterprise Fund was enacted into law by the 1999 Wyoming State Legislature. Annual interest income from the Transportation Trust Fund, along with any program carry-over, provides the corpus of the fund.[21]

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[17] *Ibid.* P. 39
[18] *Ibid.* P. 40
[19] *Ibid.* P. 42
[20] *Ibid.* P. 43
[21] *Ibid.* P. 44

Public Transportation on Indian Reservations (FTA §5311(c))

The goals of the Public Transportation on Indian Reservations program are to enhance the access of public transportation on and around Indian reservations in non-urbanized areas to health care, shopping, education, employment, public services, and recreation; assist in the maintenance, development, improvement and use of public transportation systems in rural and small urban areas; encourage and facilitate the most efficient use of all Federal funds used to provide passenger transportation in non-urbanized areas through the coordination of programs and services; and provide for the participation of private transportation providers in non-urbanized transportation to the maximum extent feasible.[22]

Job Access/Reverse Commute (FTA §5316)

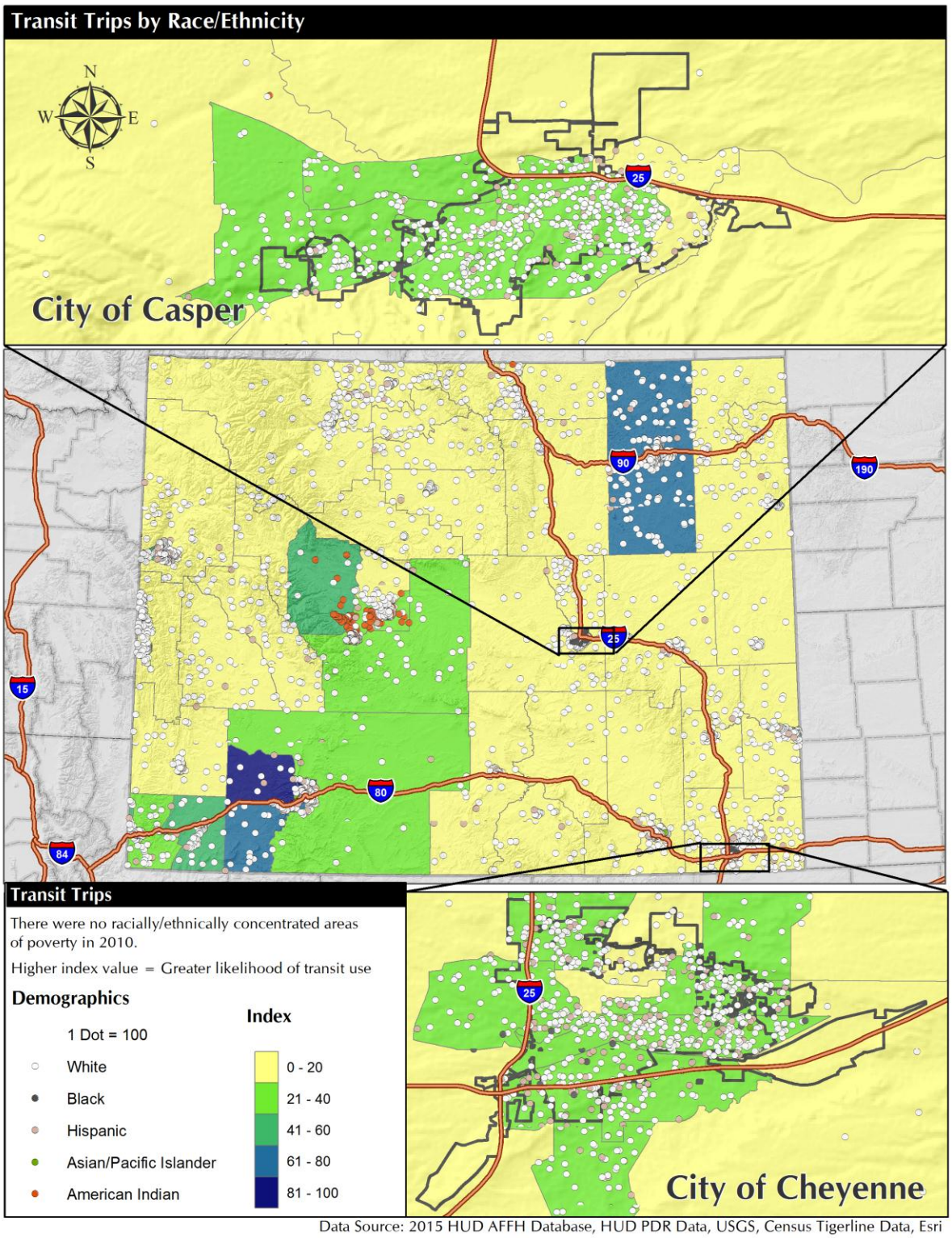
The Job Access/Reverse Commute (JARC) program exists to improve access to employment and employment related activities for low-income individuals and welfare recipients through transportation services, through capital, planning, and operating assistance. The purpose of the program is to provide transportation to employment and employment-related activities and to facilitate reverse-commuting.[23]

As noted above, HUD-provided maps and data do not reveal any substantial disparities in access to transportation by protected class in the state, or in any of the subareas included in this study. Both the Transit Trips Index and Low Transportation Cost Index were included in this analysis. Map IV.22 on the following page presents the Transit Trips Index by Census tract, along with the population by race and ethnicity. Map IV.23 on page 83 presents this index by foreign place of birth, and Map IV.24 on page 84 presents the index with families in the state, by size. The three maps beginning with Map IV.25 on page 85 show the Low Transportation Cost Index with these same three protected classes.

HUD-provided maps and data do not reveal any substantial disparities in access to transportation by protected class in the state, or in any of the subareas included in this study.

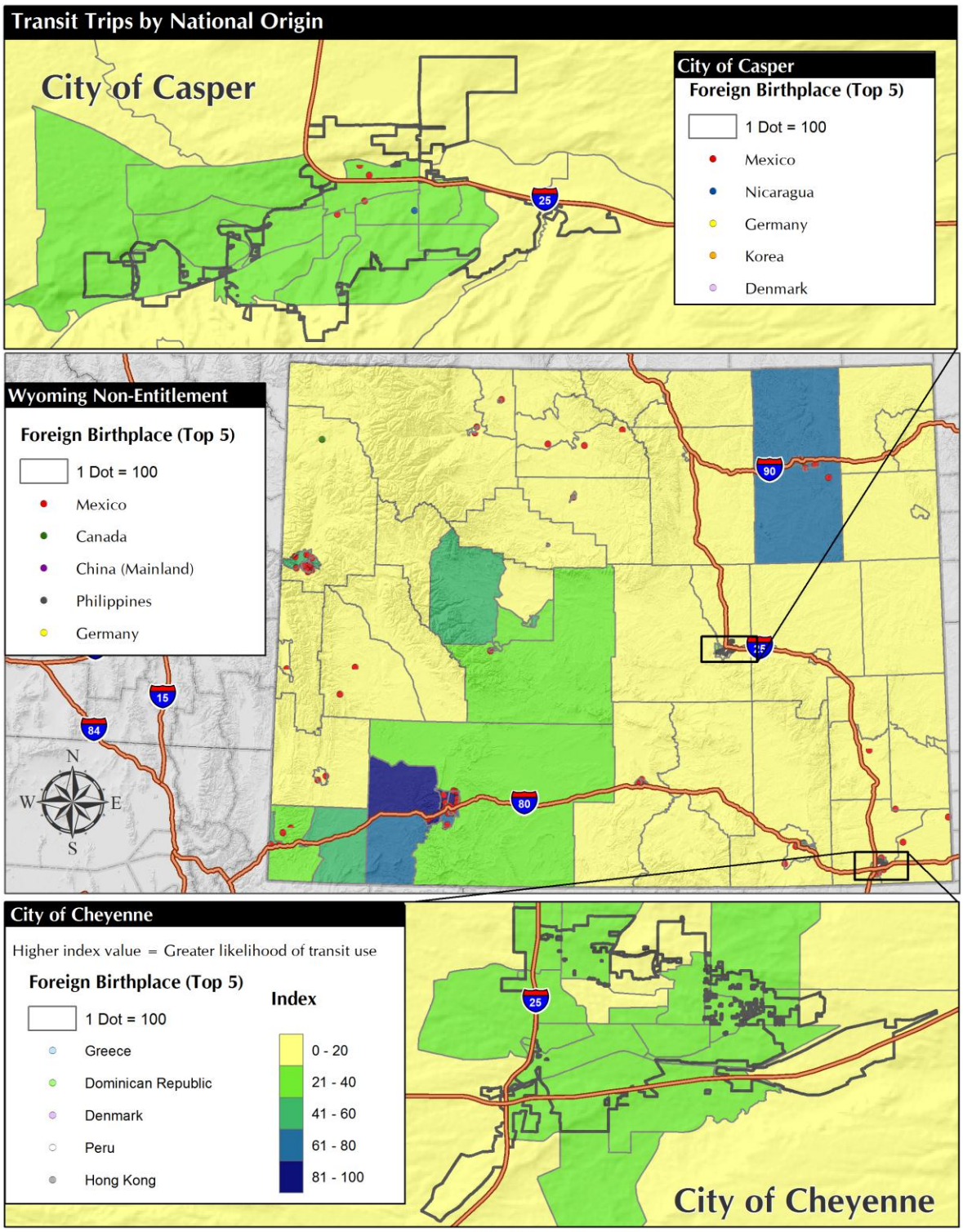
[22] *Ibid.* P. 45
[23] *Ibid.* P. 46

Map IV.22
Transit Trips Index by Race and Ethnicity
The State of Wyoming and Entitlement Areas
2015 AFFH Raw Data



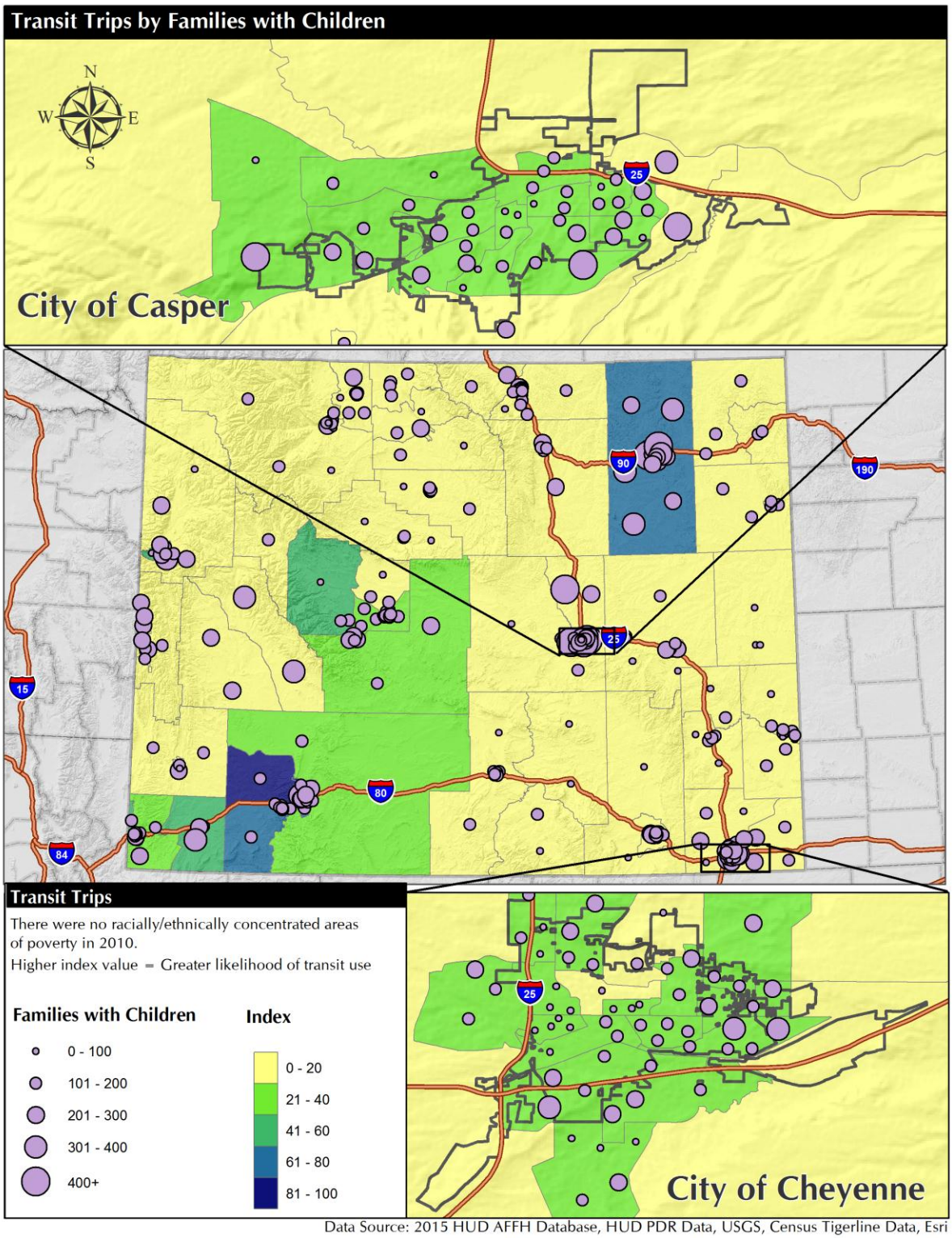
Data Source: 2015 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline Data, Esri

Map IV.23
Transit Trips Index and National Origin (Foreign Place of Birth)
The State of Wyoming and Entitlement Areas
2015 AFFH Raw Data



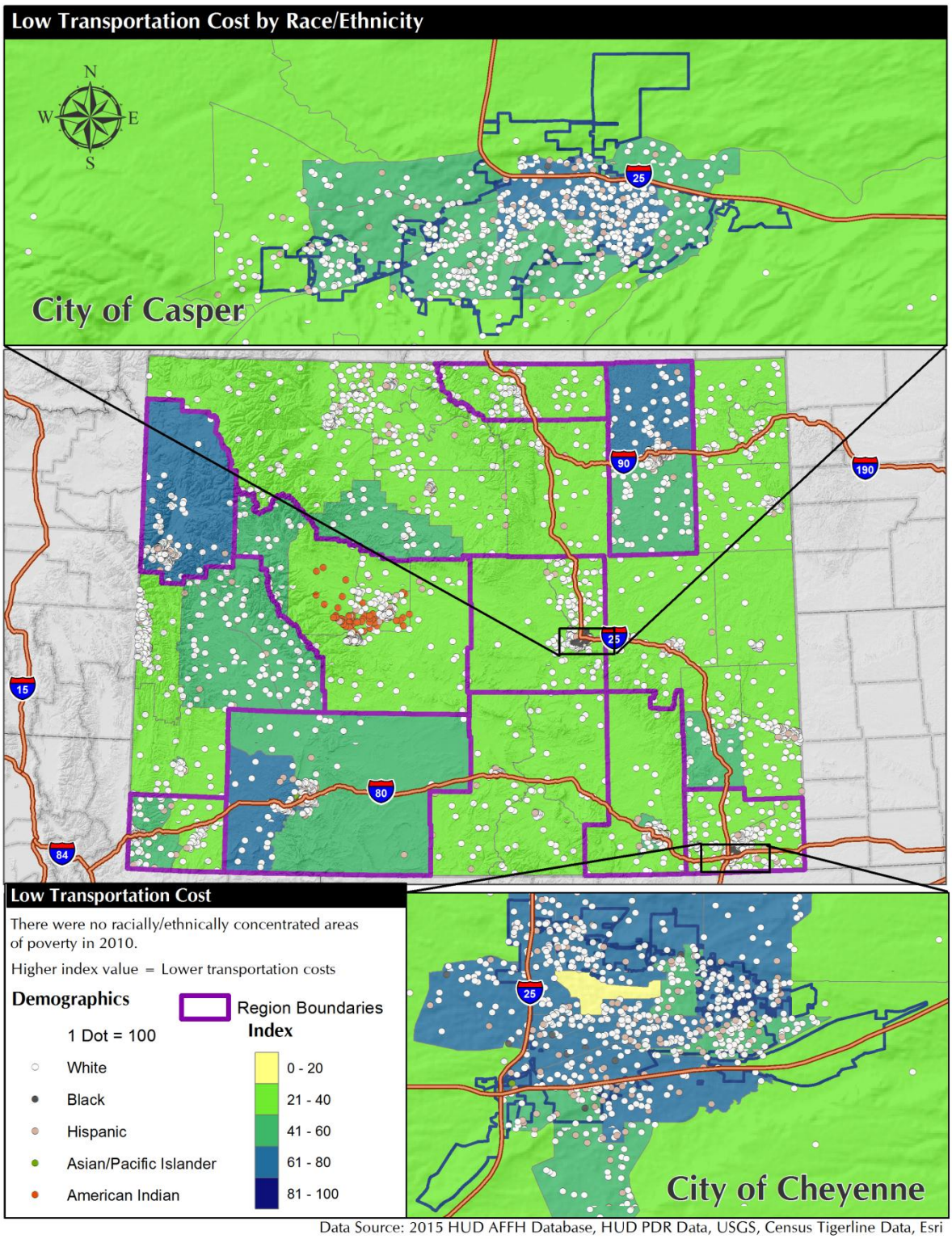
Data Source: 2015 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline Data, Esri

Map IV.24
Transit Trips Index and Families with Children
The State of Wyoming and Entitlement Areas
2015 AFFH Raw Data



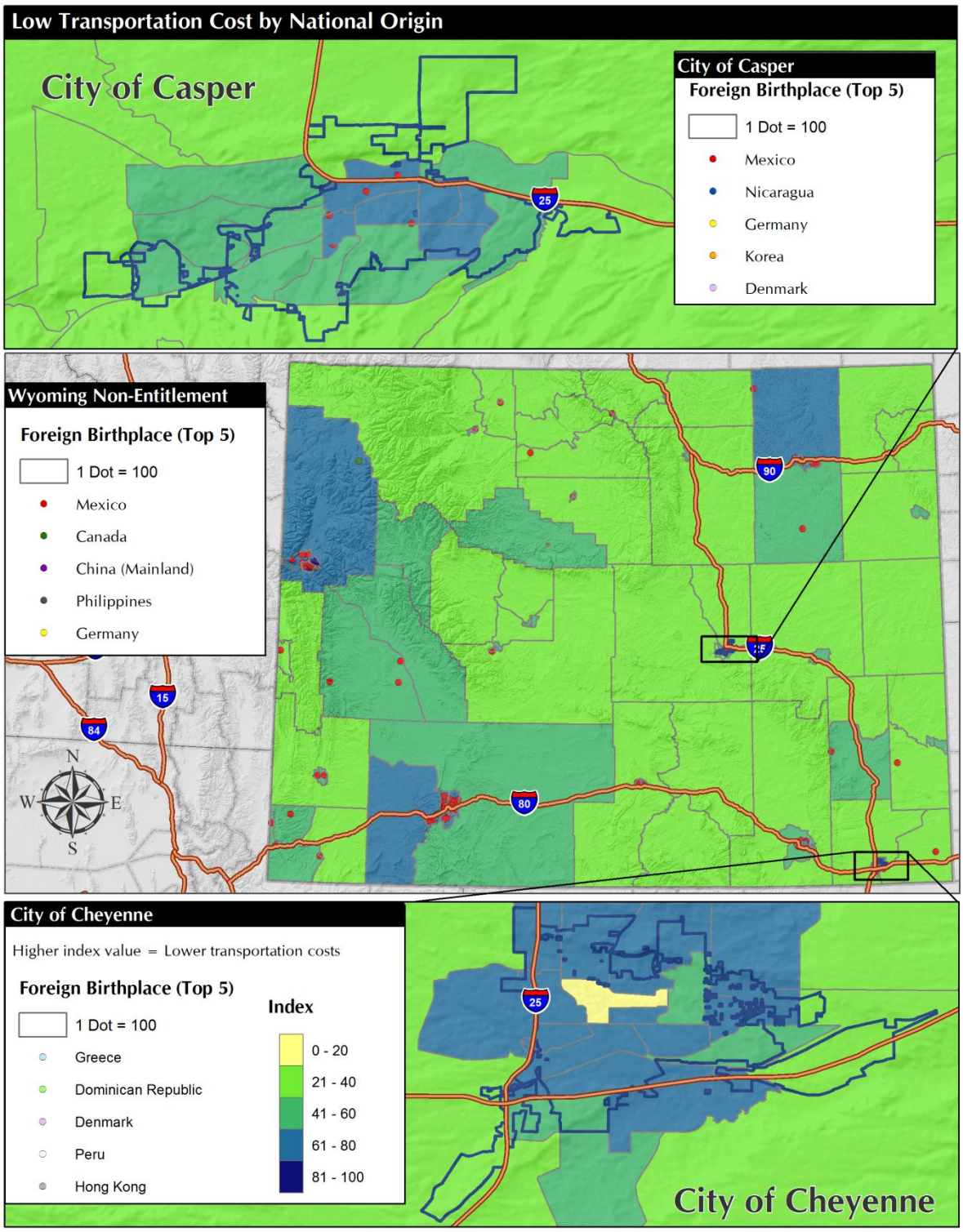
Data Source: 2015 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline Data, Esri

Map IV.25
Low Transportation Cost Index and Race/Ethnicity
The State of Wyoming and Entitlement Areas
2015 AFFH Raw Data



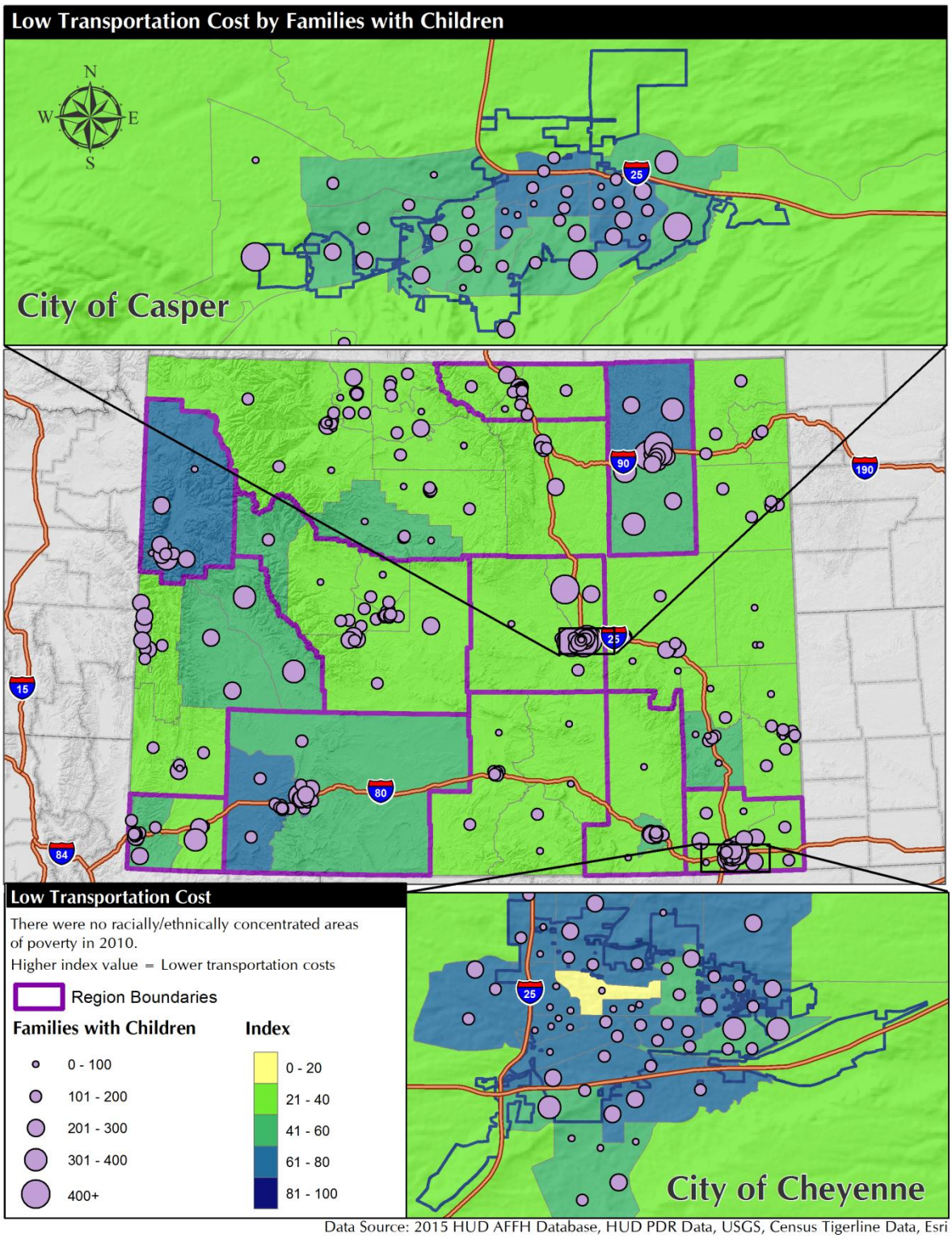
Data Source: 2015 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline Data, Esri

Map IV.26
Low Transportation Cost Index and National Origin (Foreign Place of Birth)
The State of Wyoming and Entitlement Areas
2015 AFFH Raw Data



Data Source: 2015 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline Data, Esri

Map IV.27
Low Transportation Cost Index and Families with Children
The State of Wyoming and Entitlement Areas
2015 AFFH Raw Data



Data Source: 2015 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline Data, Esri

The State has relatively limited public transportation networks outside of the major cities. That being said, the data provided by HUD do not reveal any substantial disparities in access to transportation, or suggest that there are differences in the degree of access to jobs, schools, or other areas of opportunity that might be impacted by disparities in access to transportation.

d) **Access to Low Poverty Neighborhoods**

In addition to the efforts of State and local agencies to promote employment and improve the financial situations of state residents, Wyoming has highlighted the provision of affordable housing throughout the state as a key element in its anti-poverty strategy, and in efforts to promote access to low poverty areas. Actions that the State will take to promote employment and economic opportunities were previously highlighted in the discussion of employment opportunity. This section will focus on State efforts to promote the supply and equitable distribution of affordable housing units.

In December of 2012, the State of Wyoming finalized its 2013-2017 Consolidated Plan, outlining its goals and objectives for housing and community development during that time period. Included in those goals and objectives were a range of housing activities designed to prioritize the delivery of decent, safe housing for very low-, low-, and moderate-income individuals with little to no ability to increase their income earning potential, including elderly residents and those with mental, physical, and developmental disabilities.[24]

In evaluating its performance in the last consolidated planning cycle, which began in 2008, the State noted that there remains a need for affordable rental housing throughout Wyoming. From 2008 through 2012, the State surpassed its 2008 targets for additional rental units and homeowner rehabilitation. However, production of rental housing remained a challenge through the last consolidated planning cycle, owing to rising production costs. Unfortunately, funding for affordable rental housing did not rise with increased costs.

In order to remove or ameliorate barriers to affordable housing identified in the 2012-2017 Consolidated Plan, the State and local jurisdictions throughout the state have adopted a variety of strategies, including the waiving of development fees and charges, allowance of greater development densities where appropriate, provision for zoning variances, and donation of land or buildings.

In addition, the Wyoming Community Development Authority has structured the ranking criteria for units developed through HOME funding and Low-Income Housing Tax Credits (LIHTC) to reward developers that can provide quality housing for less money. Some of the techniques that builders have adopted to manage costs include the use of alternative construction techniques and floor plans.

In order to ensure that low-income residents who benefit from public-assisted housing have access to low poverty areas and other areas of opportunity, the State provides preferential scoring for developers who propose to build LIHTC housing where it will not contribute to concentrations of public-assisted units.[25] The State also added geographic distribution as a

[24] For more information on the State's housing and community development goals and priorities, refer to the 2012-2017 Consolidated Plan for the State of Wyoming.
[25] "2016 Initial Allocation Criteria." 2016 Affordable Housing Allocation Plan. Wyoming Community Development Authority.

scoring criterion in 2013 to "ensure that affordable housing resources are distributed throughout the state and no one community shall benefit disproportionately to the rest of the state."[26]

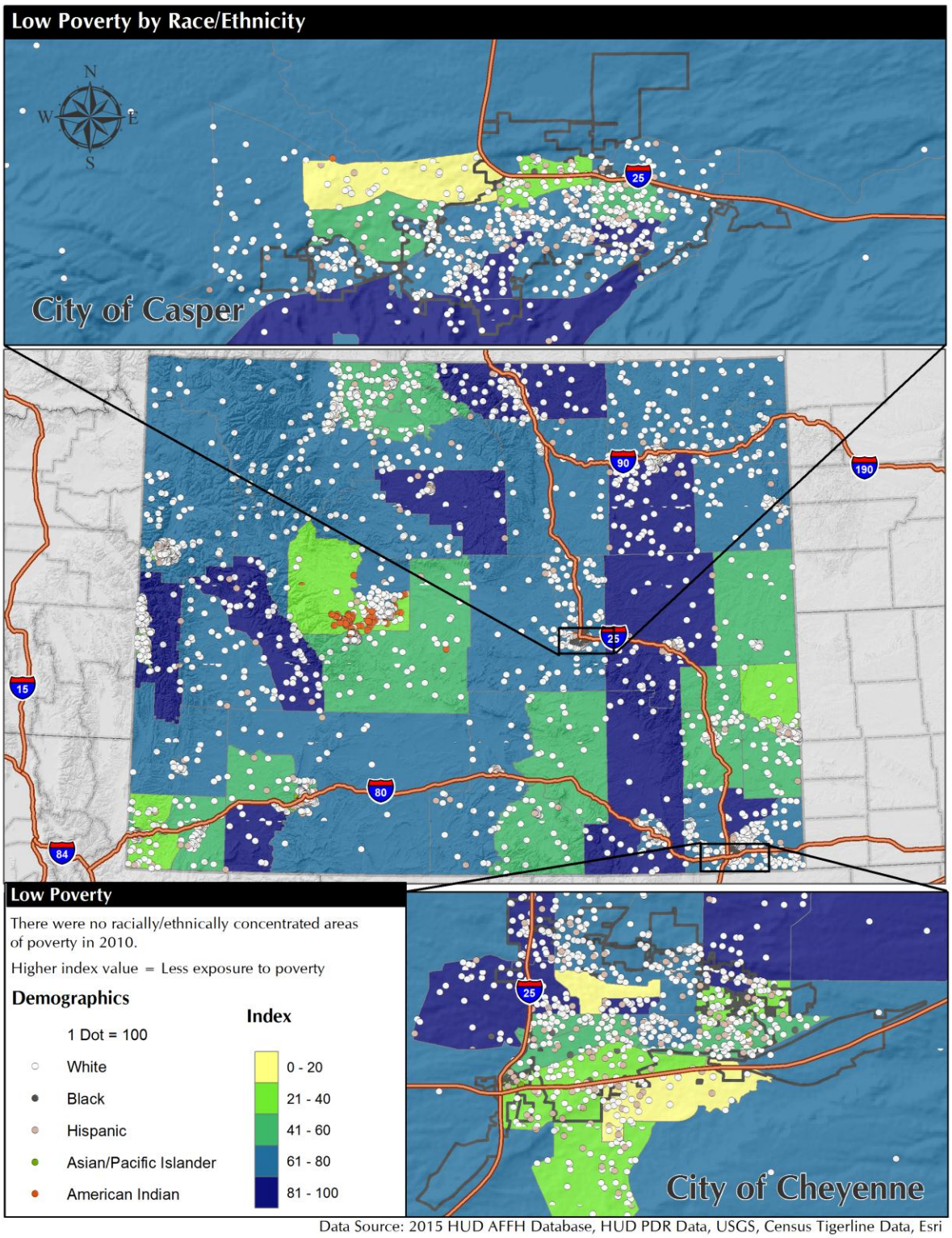
HUD-provided maps and data do not reveal any substantial disparities in exposure to poverty by protected class in the state, or in any of the subareas included in this study. Map IV.28 on the following page presents the distribution of access to low poverty neighborhoods by Census tract, along with the population by race and ethnicity. Map IV.29 on page 91 presents the distribution of residents by foreign place of birth. Map IV.30 on page 92 presents the distribution of families in the state, by size.

According to HUD-provided data based on 2006-2010 ACS figures, access to low-poverty areas differs markedly by geographic location. This is also consistent with more recent ACS estimates of poverty in the state, based on data from 2010-2014. According to those estimates, presented in Map IV.31 on page 93, poverty rates were above average throughout Carbon County, Platte, Goshen, and Niobrara counties, as well as in outlying Census tracts in south Cheyenne and North Casper. The highest poverty rates in the state were observed in four Census tracts surrounding the University of Wyoming in Laramie, where between 33 and 80 percent of the population was living in poverty in 2010-2014.

In spite of these variations in poverty by geographic area, exposure to poverty was not observed to vary according to the protected class of state residents, as noted above.

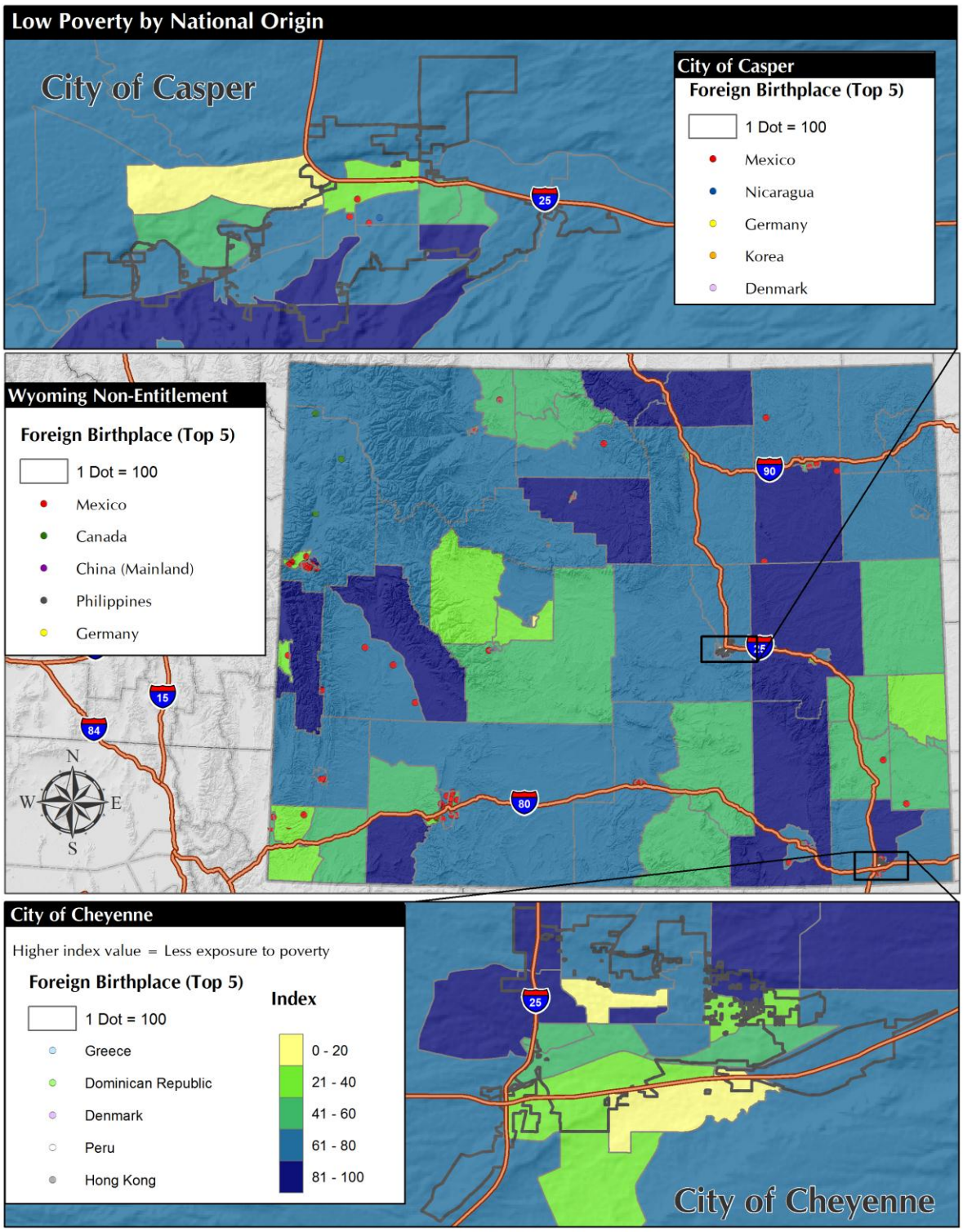
[26] 2012-2017 Consolidated Plan, P. 242

Map IV.28
Low Poverty Index by Race/Ethnicity
The State of Wyoming and Entitlement Areas
2015 AFFH Raw Data



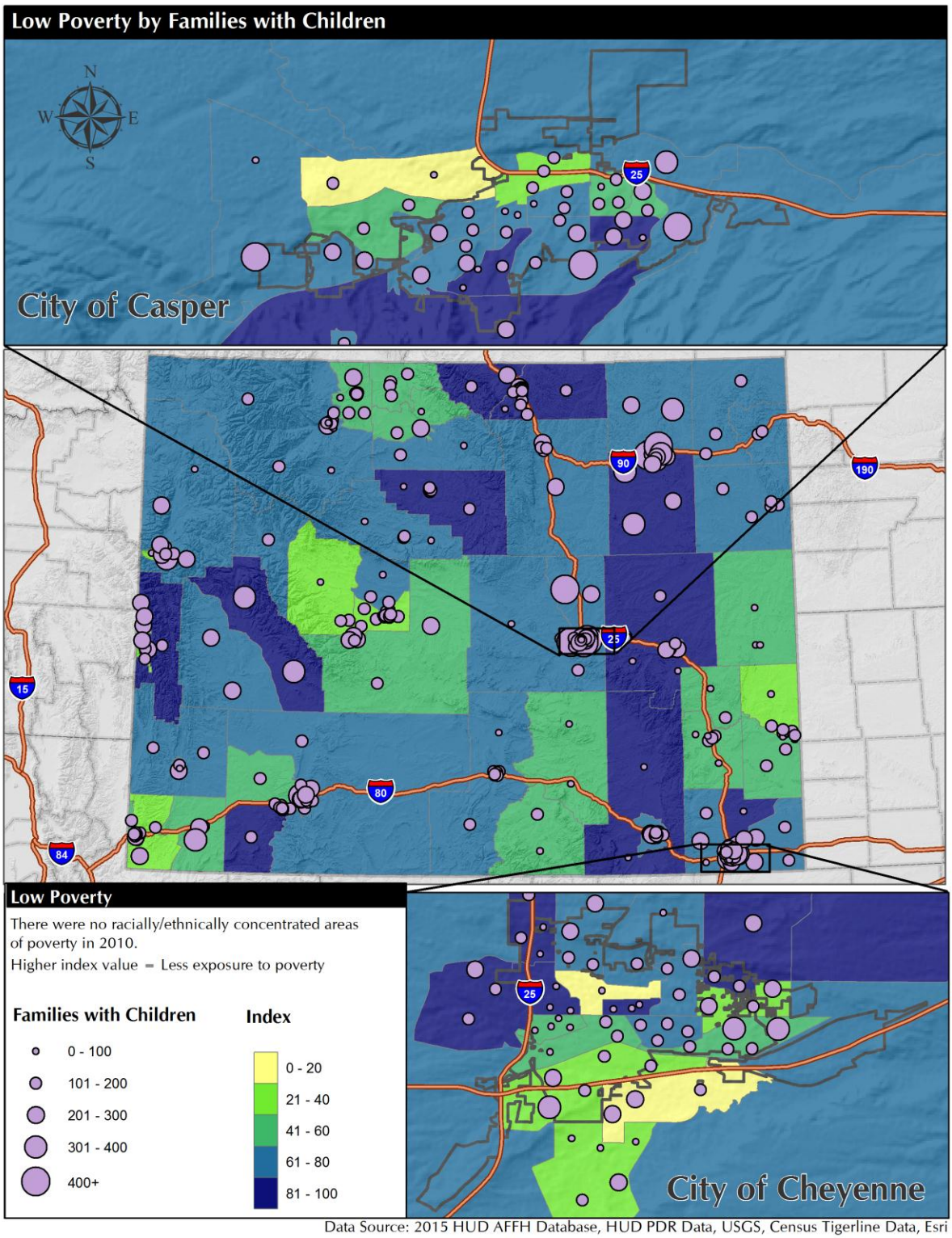
Data Source: 2015 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline Data, Esri

Map IV.29
Low Poverty Index and National Origin (Foreign Place of Birth)
The State of Wyoming and Entitlement Areas
2015 AFFH Raw Data



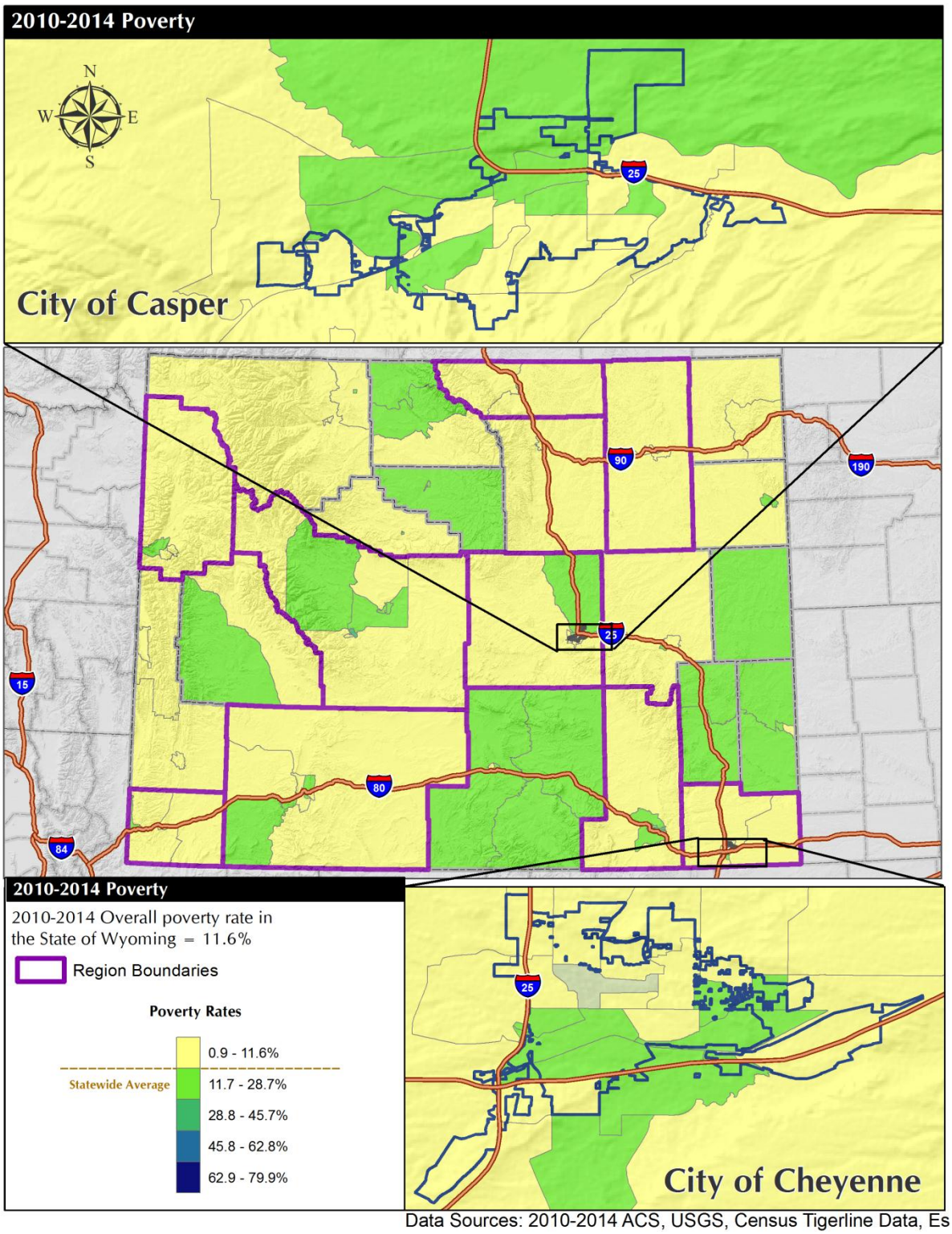
Data Source: 2015 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline Data, Esri

Map IV.30
Low Poverty Index and Families with Children
The State of Wyoming and Entitlement Areas
2015 AFFH Raw Data



Data Source: 2015 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline Data, Esri

Map IV.31
Poverty in 2010-2014
The State of Wyoming and Entitlement Areas
2010-2014 ACS Data



Data Sources: 2010-2014 ACS, USGS, Census Tigerline Data, Es

e) Access to Environmentally Healthy Neighborhoods

In 2015, the Wyoming Department of Environmental Quality (WDEQ) finalized and submitted its Strategic Plan for FY 2016 through FY 2019. In this plan, the agency detailed the priorities and goals it would adopt to continue to promote environmental health throughout the state, through actions undertaken by the Air Quality Division, the Water Quality Division, the Solid and Hazardous Waste Division, the Land Quality Division, the Industrial Siting Division, the Abandoned Mine Land Division, and the Administrative Division.

In response to the needs and challenges that each division currently faces, the WDEQ has adopted seven overarching goals for FY2016-2019, with each division adopting a set of strategies to serve those goals. A summary of these goals and is provided below:[27]

- **Goal 1: To investigate, remediate, and restore contaminated and disturbed sites.**

The WDEQ investigates, remediates, and restores sites that have been contaminated or disturbed by industrial activities, spills, and other sources. The agency will continue efforts to prevent and reduce the severity of incidents that impact the environment by fostering pollution prevention, spill prevention and control, and green and sustainable remediation approaches.

- **Goal 2: To collect, manage, and monitor the environmental data needed to accomplish agency responsibilities.**

The WDEQ will continue to take advantage of improving technologies to capture, manage, and analyze environmental data, whether in monitoring and assessment activities undertaken by the agency itself or through its contractors (e.g., ambient air and water quality, Storage Tank Program, Orphan Sites Program, permit inspections), activities undertaken by parties responsible for remediation and restoration, and activities carried out through cooperative agreements with federal agencies such as the U.S. Geological Survey and the Environmental Protection Agency.

- **Goal 3: To apply environmental standards and requirements that protect the environment while allowing for responsible economic development.**

During the FY2016-2019 period, the WDEQ will seek to streamline regulatory efforts to meet the dual goals of responsible environmental management and economic development; provide consistent training and guidance regarding permit content requirements, and implement the most efficient means of compiling those requirements.

- **Goal 4: To ensure adherence with environmental standards and other requirements.**

In order to promote an atmosphere in which the regulated community and general public work together to meet all environmental laws and standards, the WDEQ will provide clear assistance and guidance to the regulated community, apply rules and regulations fairly and consistently across the state, provide timely inspections and decisions in compliance programs, and

[27] For more information, see the complete report: "FY2016-2019 Strategic Plan." Wyoming Department of Environmental Quality. Submitted September 2015. Accessed September 21, 2016 at http://deq.wyoming.gov/media/uploads/admin/strategic_plan_2016-2019_signed.pdf.

implement enforcement actions without bias while providing necessary resources and training to efficiently implement compliance programs.

- **Goal 5: To develop a clear, concise, and consistent regulatory framework.**

In working toward a system of regulation that is clear, concise, and more effective, the WDEQ continues to review and update its regulations to make them more streamlined and simple. In response to a request from the Governor to reduce the number and length of its existing rules by one-third, the agency will seek to reorganize and consolidate these rules, eliminate obsolete or unnecessary rules, and provide more concise language in order to meet that target.

- **Goal 6: To develop and maintain an outcome oriented workforce and culture.**

Throughout the strategic planning process, the WDEQ will explore strategies to improve agency recruitment and retention. Potential strategies include the creation and implementation of a workforce development program, continued training initiatives, and enhancement of employee reward and recognition efforts.

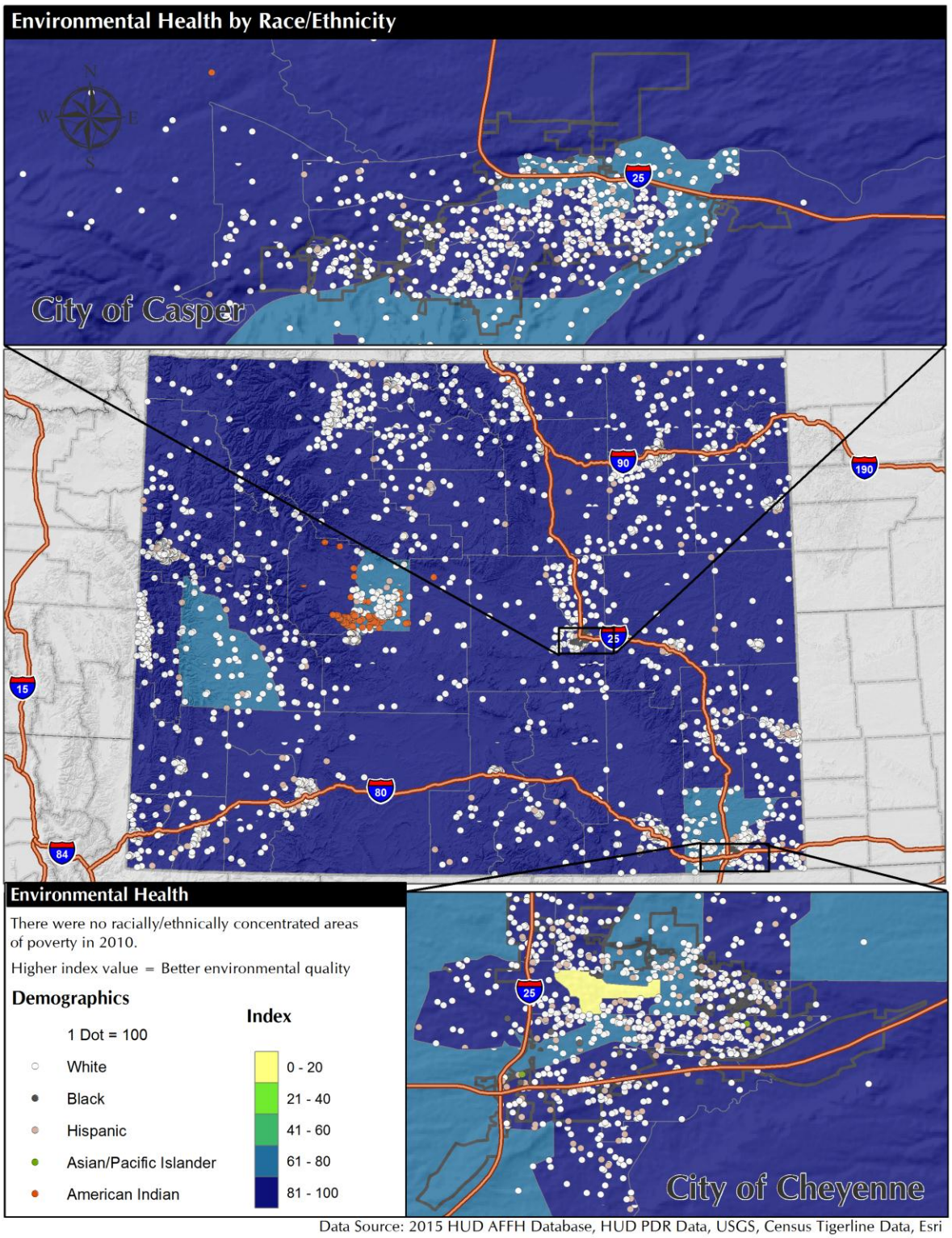
- **Goal 7: To administer and manage the resources of the agency in a responsible manner.**

The WDEQ will continue to undertake critical analysis of budget expenditures and contract processing procedures. In addition, the agency will meticulously budget and plan in order to devote resources to areas where they are most needed and efficiently manage the business of the agency.

According to the environmental health index, the quality of air in Wyoming is exemplary across the vast majority of the state. Census tracts with environmental health index scores above 90 cover 92 percent of the state's overall land area, and areas in which the air quality is considerably better than average (ranked nationally) cover well over 99 percent of the total land area of the state. There are no observable disparities in access to environmentally health areas within the state by protected class, according to HUD's data. Map IV.32, Map IV.33, and Map IV.34 in the following pages compare the health of Wyoming's air to the distribution of residents by race/ethnicity, foreign place of birth, and family size, respectively.

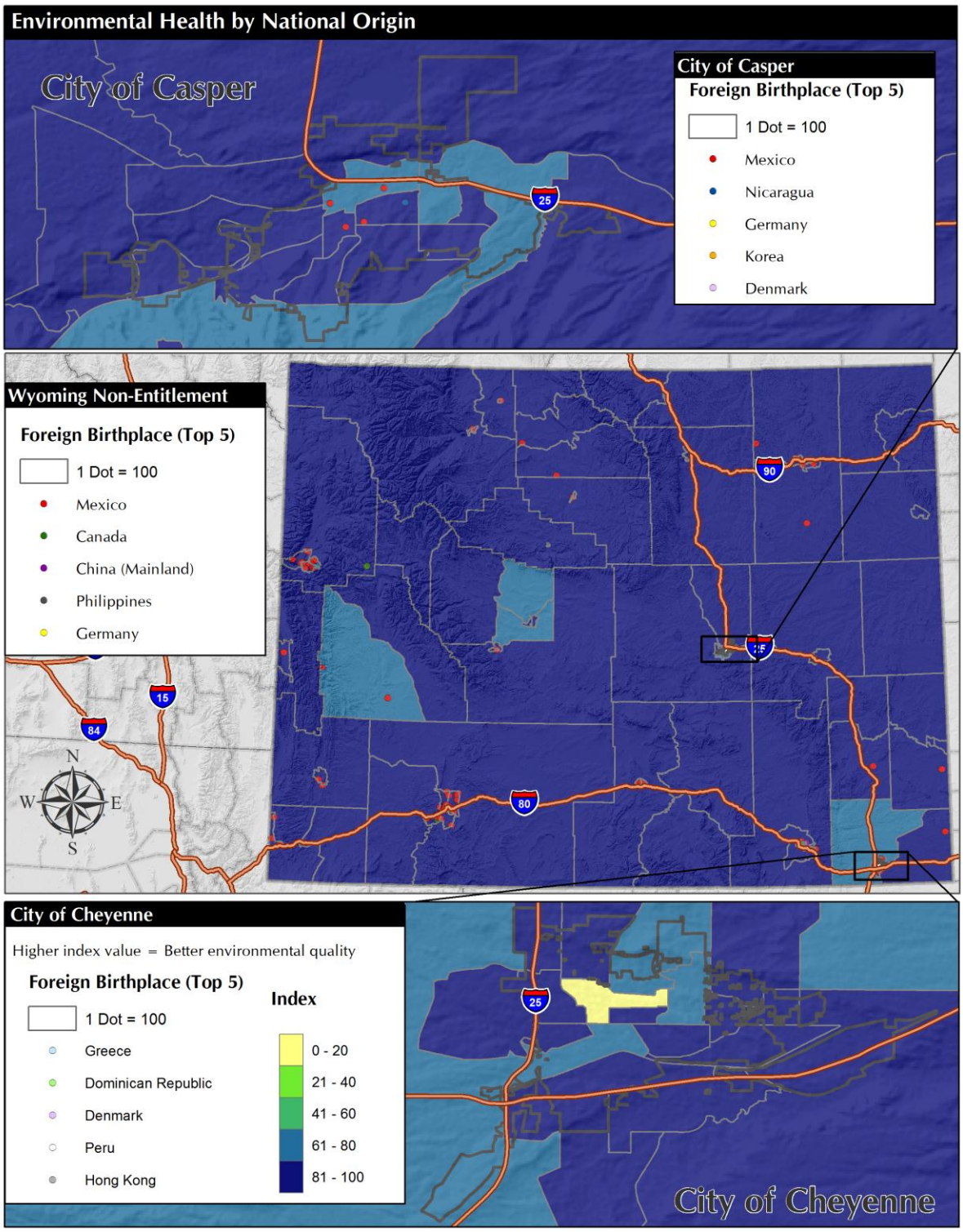
As noted above, no disparities were observed in access to environmentally healthy neighborhoods by protected class.

Map IV.32
Environmental Health Index and Race/Ethnicity
The State of Wyoming and Entitlement Areas
2015 AFFH Raw Data



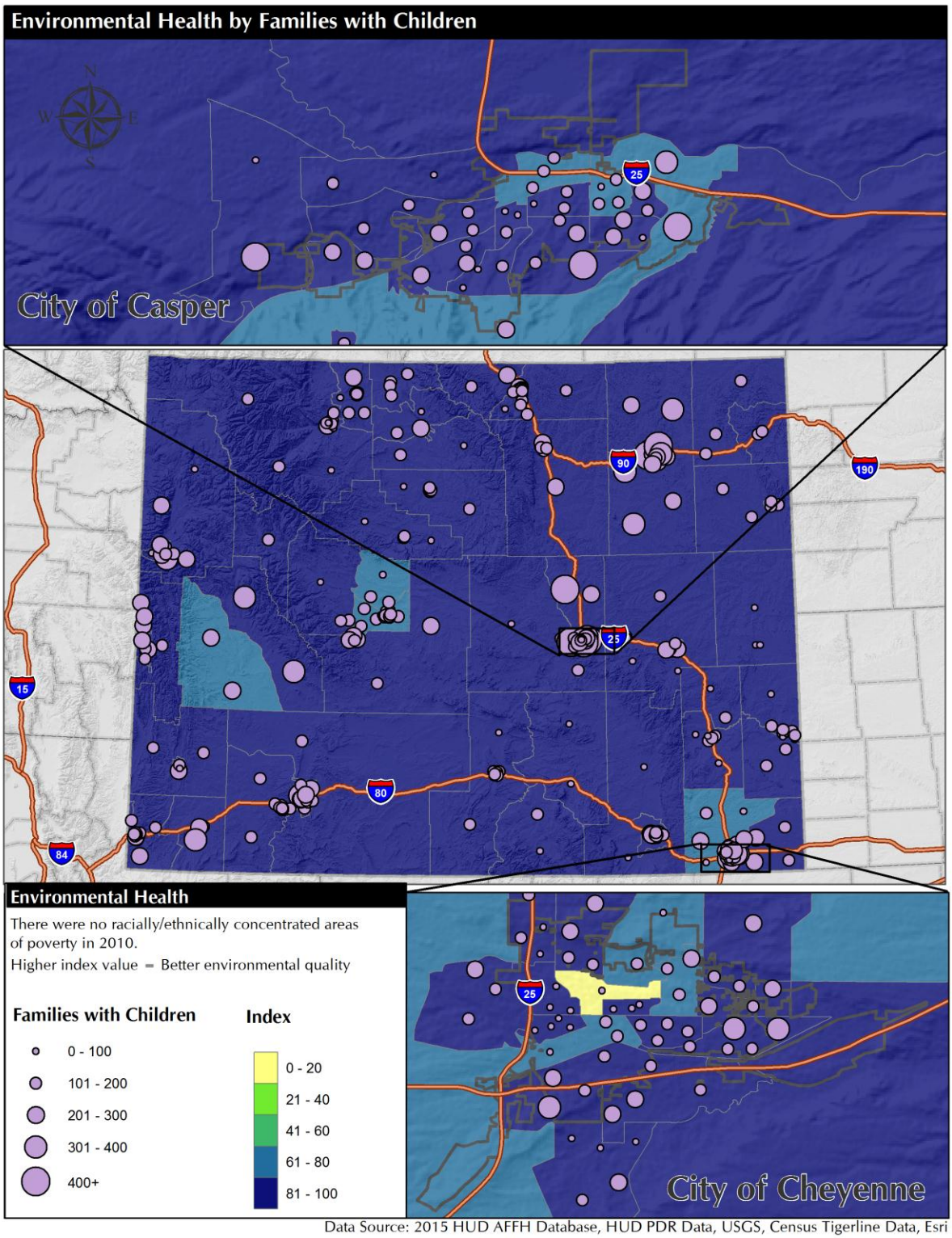
Data Source: 2015 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline Data, Esri

Map IV.33
Environmental Health Index and National Origin (Foreign Place of Birth)
The State of Wyoming and Entitlement Areas
2015 AFFH Raw Data



Data Source: 2015 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline Data, Esri

Map IV.34
Environmental Health Index and Families with Children
The State of Wyoming and Entitlement Areas
2015 AFFH Raw Data



Data Source: 2015 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline Data, Esri

f) Patterns in Disparities in Access to Opportunity

Residents of Wyoming and the subareas included in this study do not experience substantial disparities in access to opportunity along any of the dimensions measured by the opportunity indices provided by HUD. These indices have not revealed any fair housing issues in any part of the state that is not under the sovereignty of the Eastern Shoshone and Northern Arapaho tribes.

Additional Information

Because HUD-provided data do not reveal substantial discrepancies in access to opportunity by protected class status, the Wyoming Fair Housing Team has sought to supplement HUD's opportunity indices with additional measures of opportunity in the state. This was also motivated by the perception; widely shared among stakeholders and residents who participated in public outreach sessions; that those indices were not applicable to the state.

Furthermore, noting that the indices were based on data that were in some cases a decade old, participants in the process questioned the relevance of those indices to a state with an economy as dynamic as Wyoming's. Of particular concern in this regard were indices relating to employment and the labor market: the state has been heavily impacted by the recent fall in global oil prices, which has in turn affected economic activity related to oil extraction. Around 6.5 million barrels of crude oil were produced in the State in March of 2016, approximately 16.4 percent and 1.3 million barrels below the recent peak in oil production one year earlier.[28] The statewide unemployment rate rose from 3.9 to 5.0 percent over that same time period.

The following narrative summarizes additional data relating to opportunity in the state that were gathered during the course of the study.

Migration

Most counties in Wyoming experienced an increase in their populations between 2014 and 2015, according to intercensal estimates taken in those years. However, eight counties experienced a decline in population: Carbon, Fremont, Goshen, Hot Springs, Sublette, Sweetwater, and Uinta, as shown in Diagram IV.3 on the following page. Net migration to the state, as measured by the number of driver's licenses issued to new residents, and surrendered by those who moved away, was positive in the first quarter of 2016, as shown in Diagram IV.4 on the following page.

[28] U.S. Energy Information Administration, 2016.

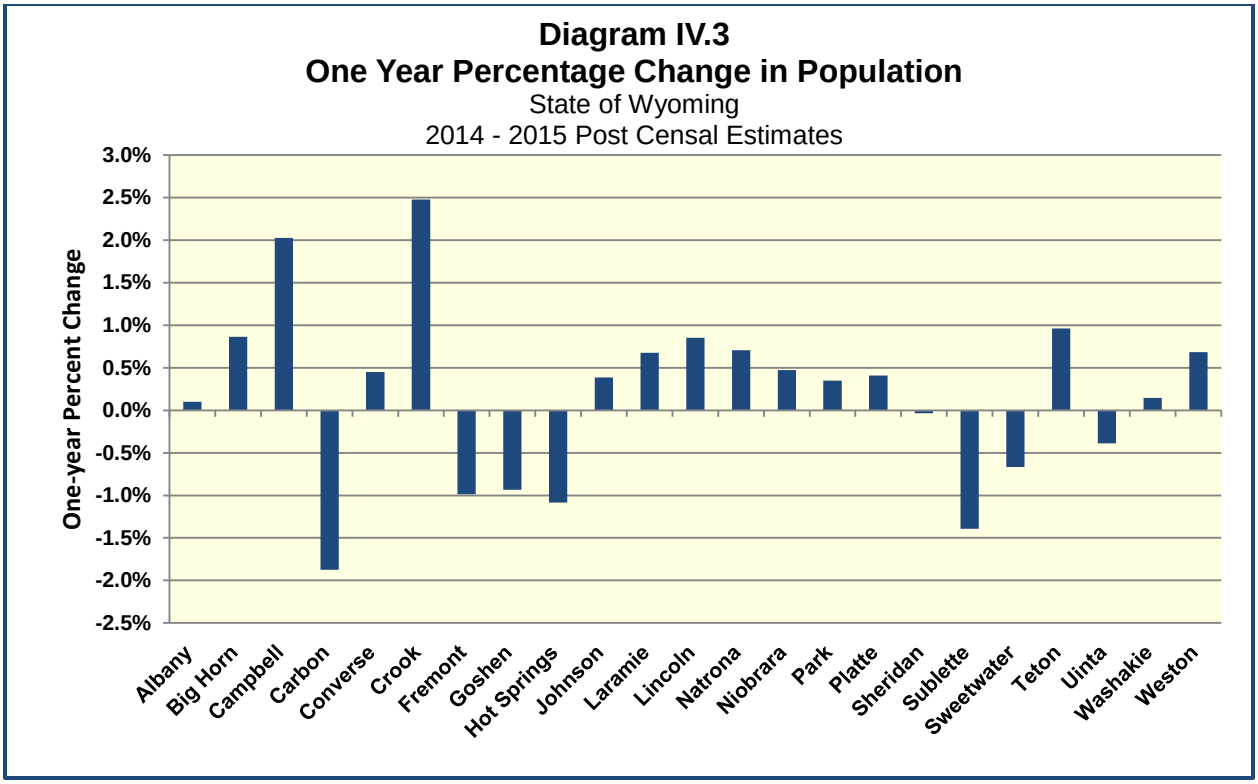


Diagram IV.3
One Year Percentage Change in Population
State of Wyoming
2014 - 2015 Post Censal Estimates
One-year Percent Change
3.0%
2.5%
2.0%
1.5%
1.0%
0.5%
0.0%
-0.5%
-1.0%
-1.5%
-2.0%
-2.5%
Albany
Big Horn
Campbell
Carbon
Converse
Crook
Fremont
Goshen
Hot Springs
Johnson
Laramie
Lincoln
Natrona
Niobrara
Park
Platte
Sheridan
Sublette
Sweetwater
Teton
Uinta
Washakie
Weston

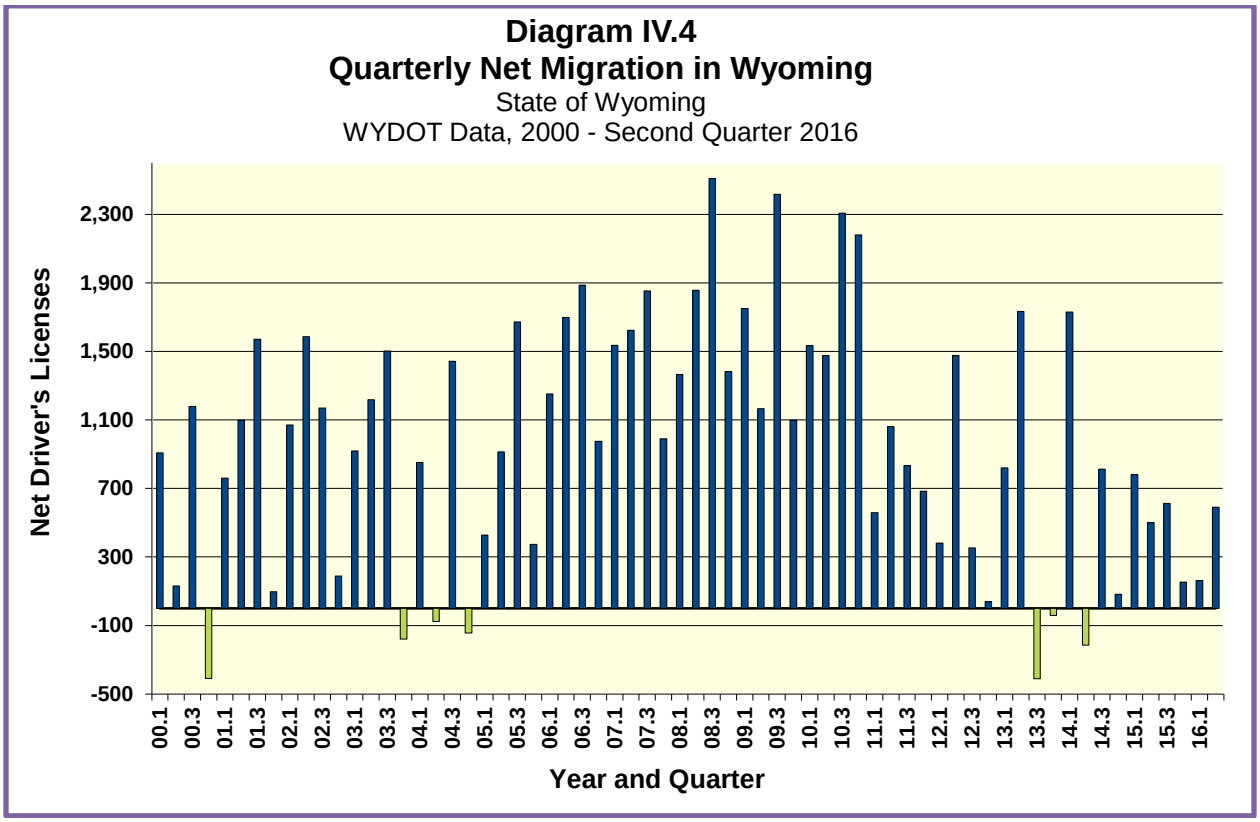
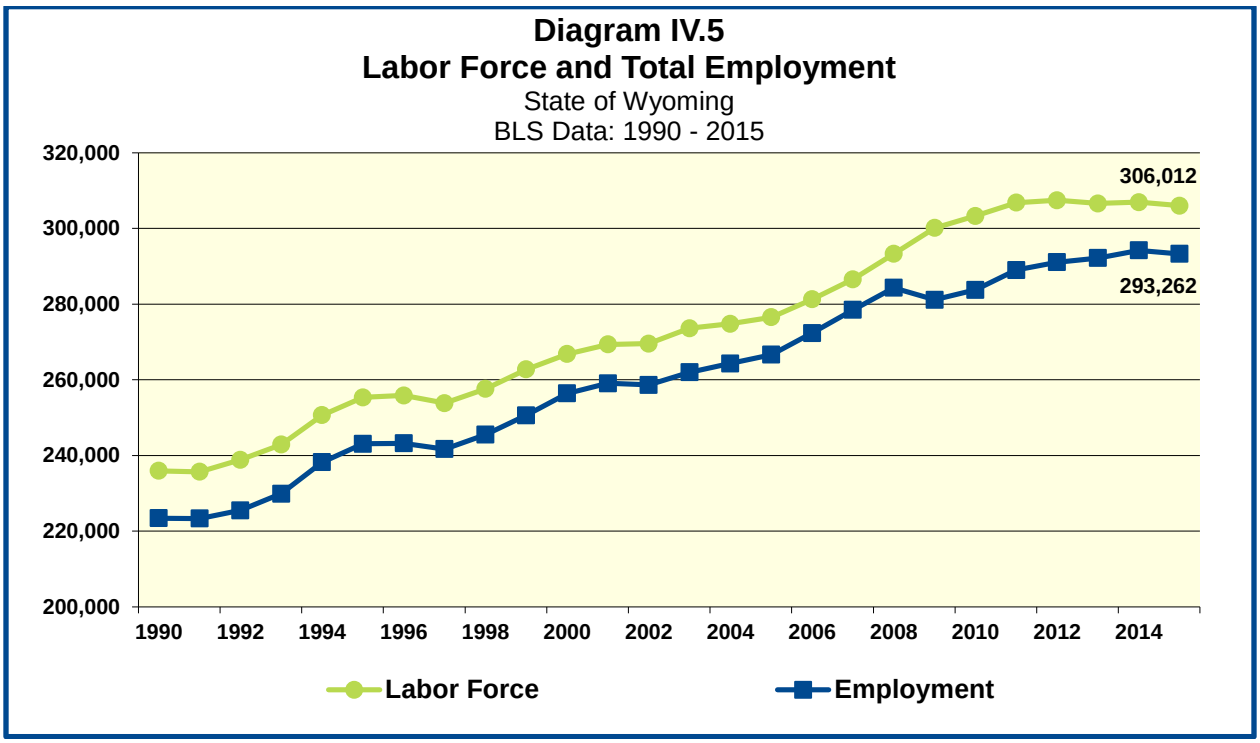


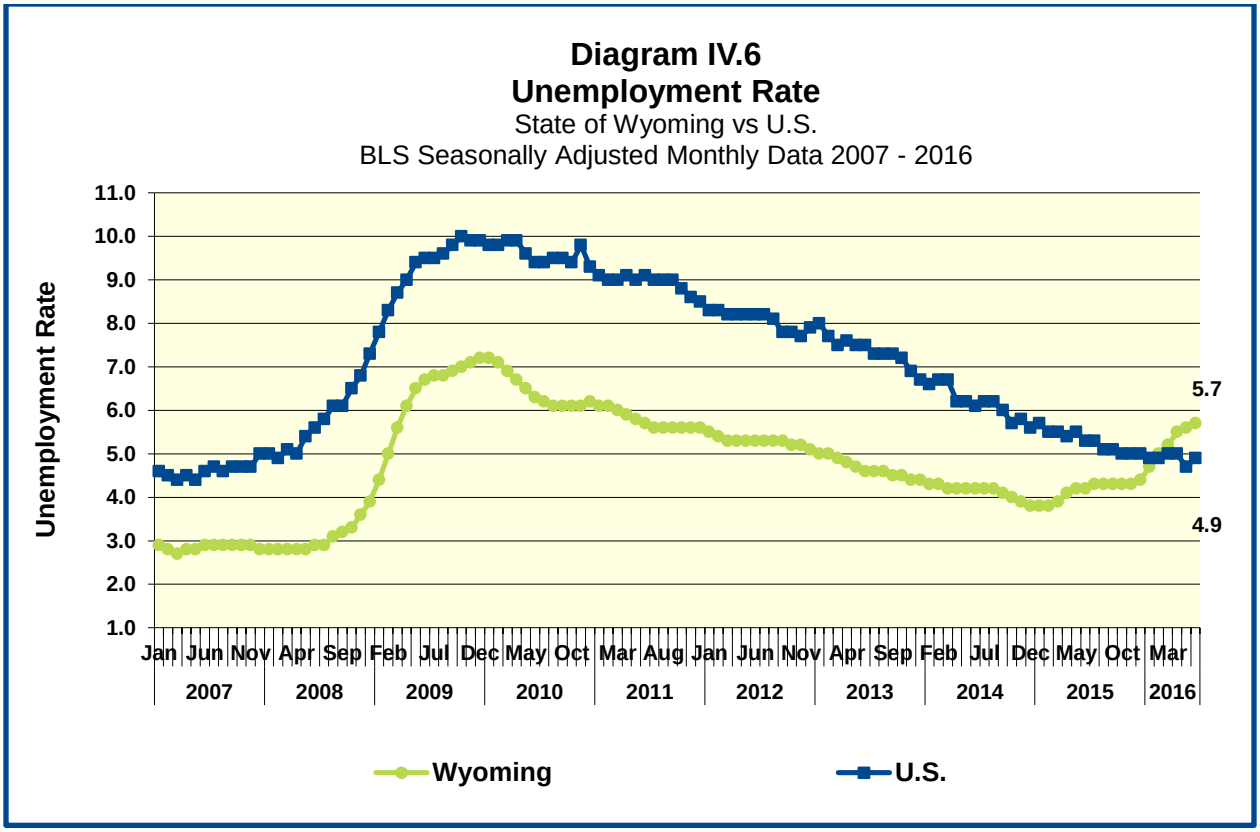
Diagram IV.4
Quarterly Net Migration in Wyoming
State of Wyoming
WYDOT Data, 2000 - Second Quarter 2016
Net Driver's Licenses
2,300
1,900
1,500
1,100
700
300
-100
-500
00.1
00.3
01.1
01.3
02.1
02.3
03.1
03.3
04.1
04.3
05.1
05.3
06.1
06.3
07.1
07.3
08.1
08.3
09.1
09.3
10.1
10.3
11.1
11.3
12.1
12.3
13.1
13.3
14.1
14.3
15.1
15.3
16.1
Year and Quarter

Employment

Growth in the labor force has generally been positive since 1990, as shown in Diagram IV.5 below, and employers throughout the state have largely been able to absorb the growing stock of workers. Nevertheless, the state was impacted by the recent national recession, which contributed to a 1.1 percent drop in the number of employed workers in 2009.

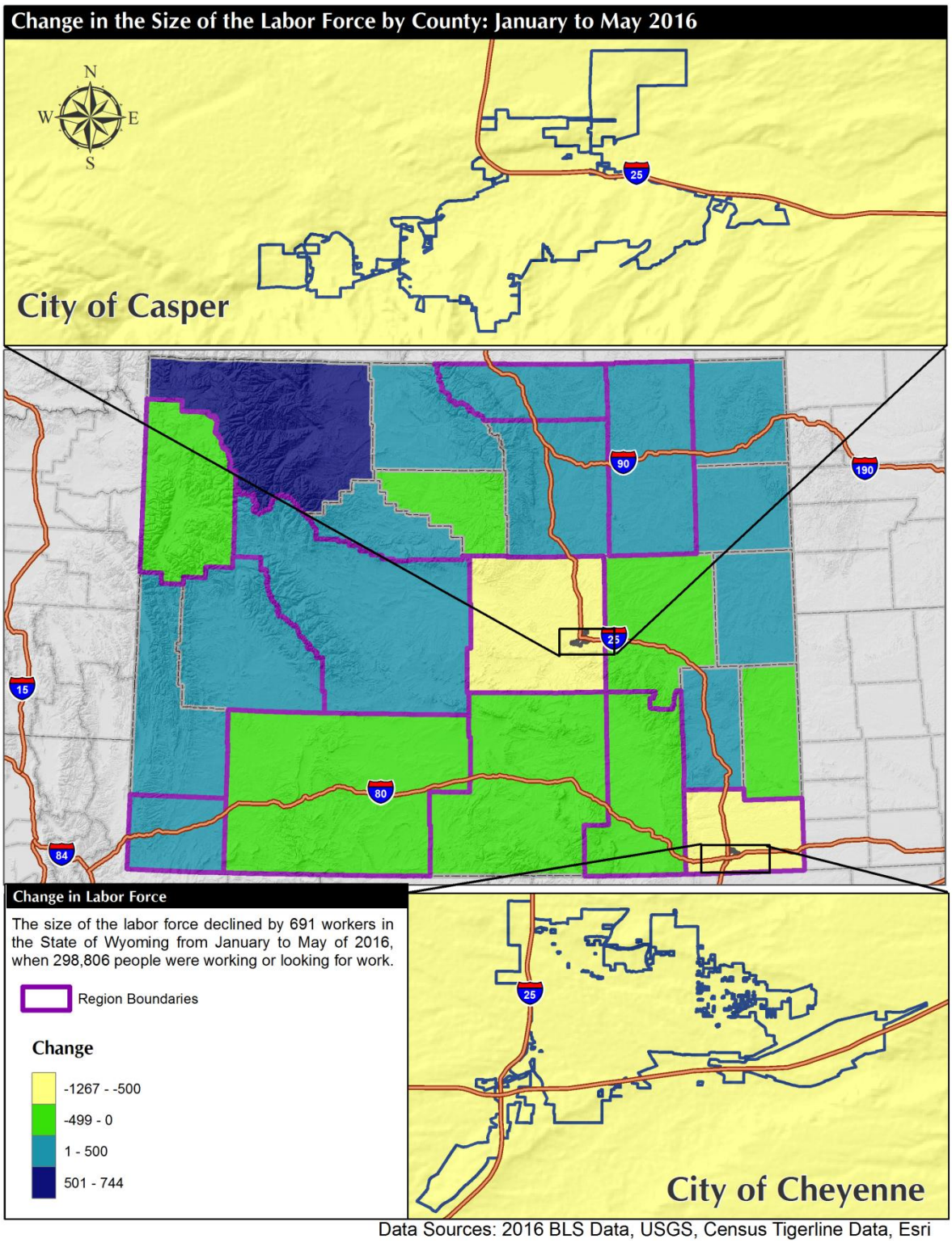


This decline, together with continued growth in the labor force, led to a spike in the unemployment rate, which reached 7.2 percent in December of 2009, as shown in Diagram IV.6 on the following page. By January of 2015 the unemployment rate had fallen to 3.8 percent. However, it has since risen to 5.7 percent, as of June 2016.



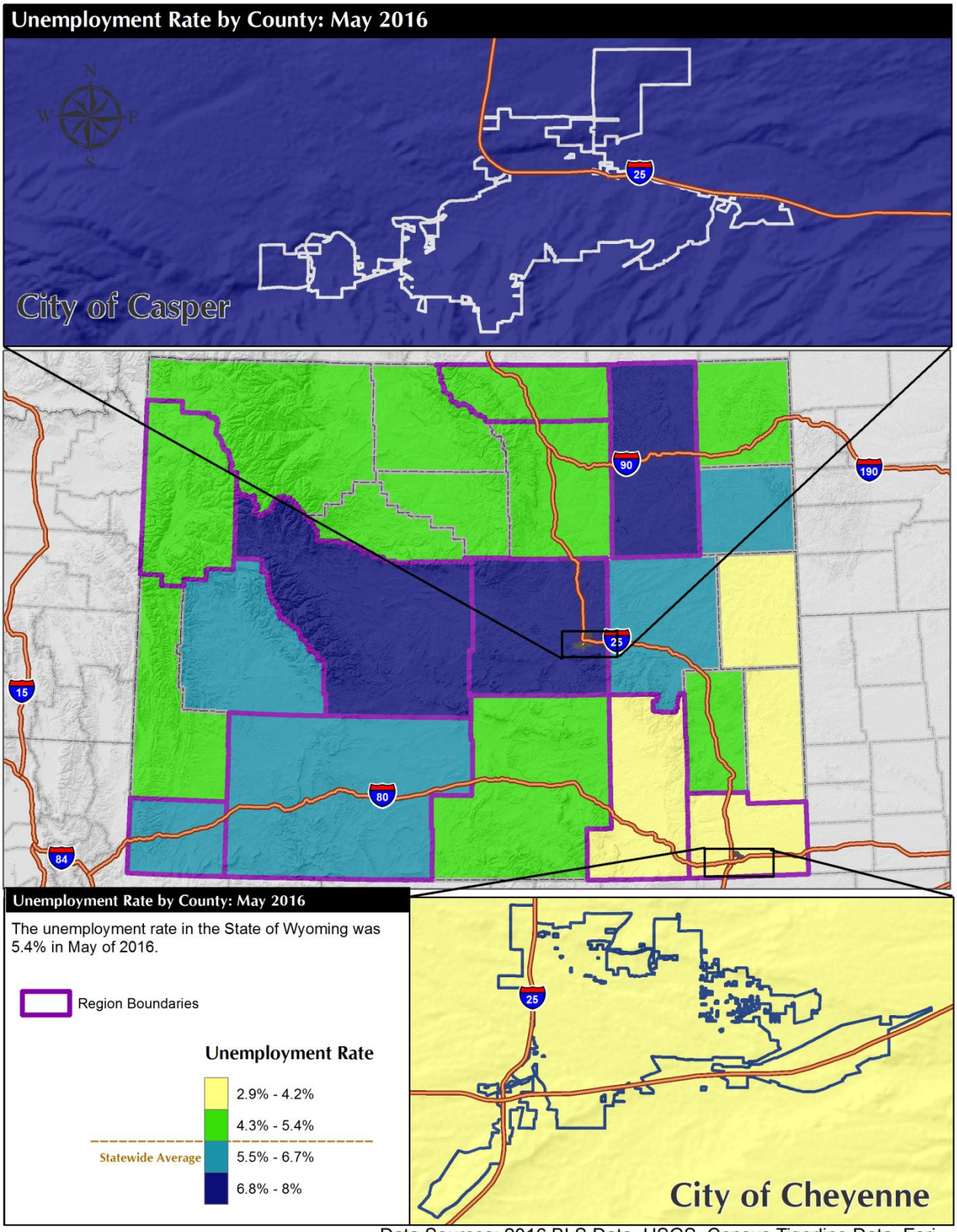
Between January and May of 2016, the counties of Natrona and Laramie each lost between 500 and 1,300 workers from their labor forces, as shown in Map IV.35 on the following page. The labor force shrank by as many as 500 workers in the counties of Albany, Carbon, Sweetwater, Goshen, Converse, Hot Springs, and Teton over the same time period. By May of 2016, unemployment rates were above the statewide average of 5.4 percent in the counties of Uinta, Sweetwater, Sublette, Fremont, Natrona, Converse, Weston, and Campbell, as shown in Map IV.36 on page 104.

Map IV.35
Change in the Size of the Labor Force by County
The State of Wyoming
2016 Bureau of Labor Statistics



Data Sources: 2016 BLS Data, USGS, Census Tigerline Data, Esri

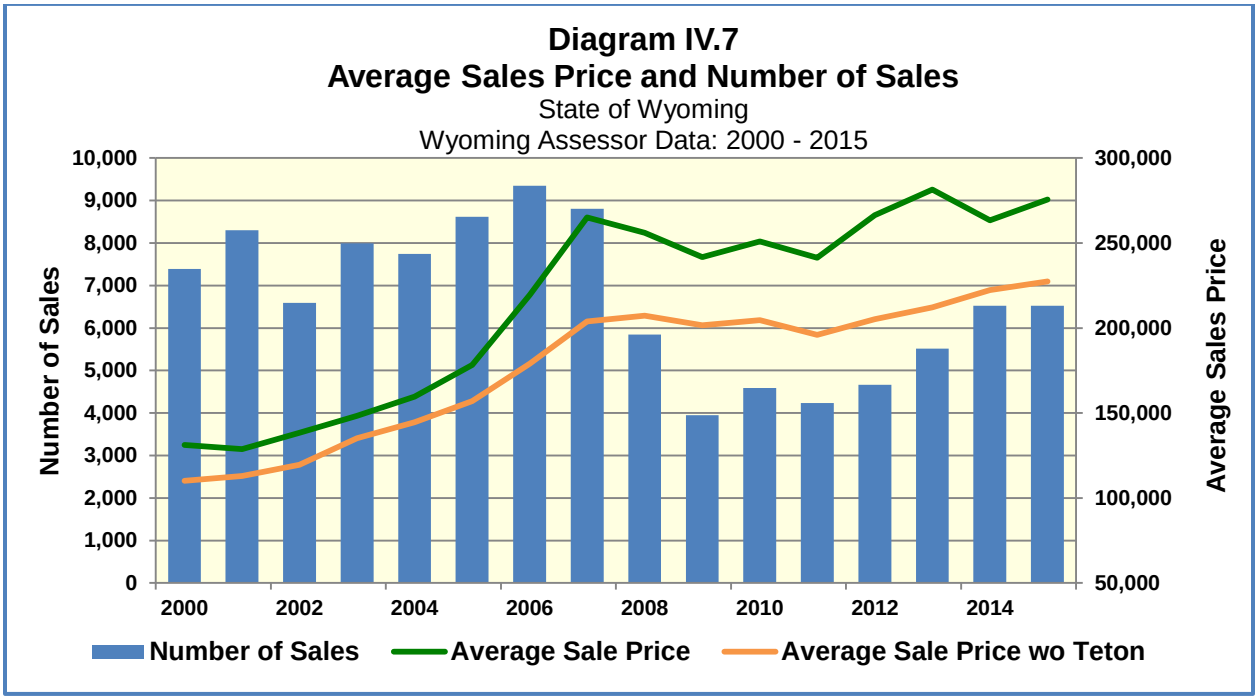
Map IV.36
Unemployment Rate by County
The State of Wyoming
2016 Bureau of Labor Statistics



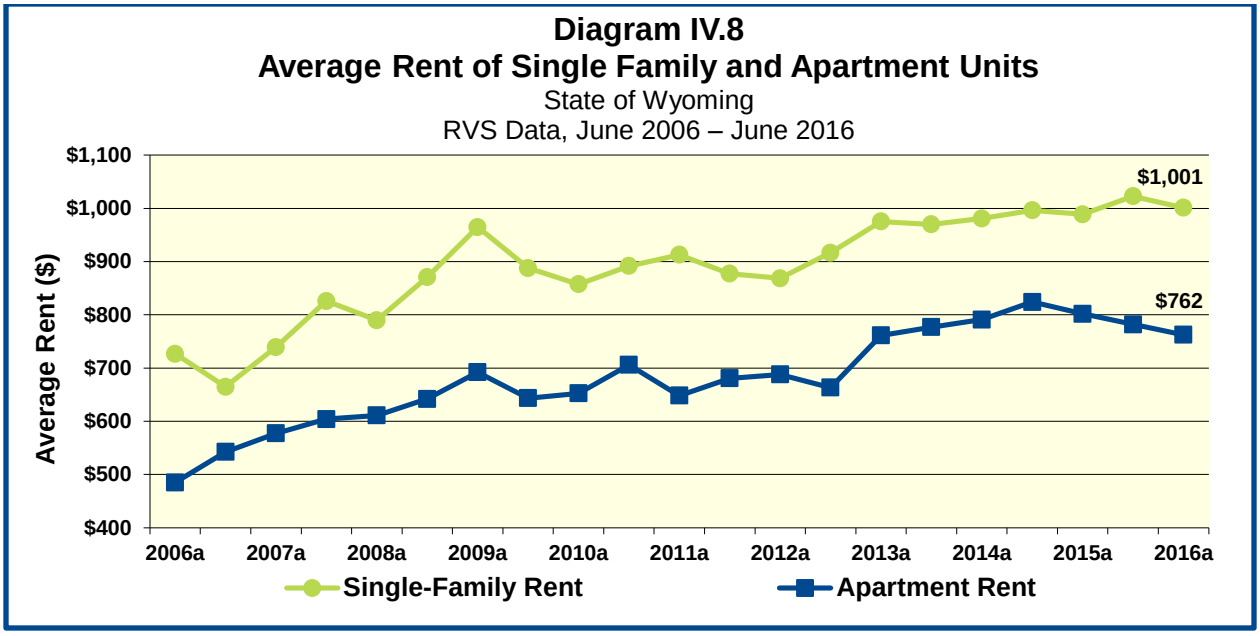
Data Sources: 2016 BLS Data, USGS, Census Tigerline Data, Esri

Housing

Following a brief decline after 2006, the number of home sales in the state rose steadily between 2011 and 2013, holding steady at around 6,500 from 2013 to 2014. As shown in Diagram IV.7 below, the average sales price of homes in Wyoming (excluding Teton County, which tends to produce exaggerated trends in home prices) grew along with the number of home sales. By 2015, the average home sales price stood at just over $225,000.



Monthly rental costs for apartment units have steadily declined over the last year and a half, according to the biennial Rental Vacancy Survey, which is conducted in support of the ongoing Wyoming Profile of Demographics, Economics, and Housing. As shown in Diagram IV.8 on the following page, the average cost of renting an apartment unit has fallen from $824 per month in the second half of 2014 to $762 in the first half of 2016. The cost of single-family rentals remained stable at around $1,000 per month over that same time period.



Home Mortgage Disclosure Act (HMDA) Data

To assess the ability of state residents to purchase a home, and to ascertain whether that ability differs by protected class status, the 2017 Assessment of Fair Housing includes a review of home lending data gathered under the Home Mortgage Disclosure Act (HMDA). These data provide a comprehensive portrait of home loan activity, including information pertaining to home purchase loans, home improvement loans, and refinancing, allowing for an analysis of patterns in home lending.

Congress enacted the Home Mortgage Disclosure Act in 1975, permanently authorizing the law in 1988.[29] The Act requires both depository and non-depository lenders to collect and publicly disclose information about housing-related applications and loans. Under the HMDA, financial institutions are required to report the race, ethnicity, sex, loan amount, and income of mortgage applicants and borrowers by Census tract. Institutions must meet a set of reporting criteria. For depository institutions, these are as follows:

- The institution must be a bank, credit union, or savings association;
- The total assets must exceed the coverage threshold;[30]
- The institution must have had a home or branch office in a Metropolitan Statistical Area (MSA);
- The institution must have originated or refinanced at least one home purchase loan secured by a first lien on a one- to four-family dwelling;
- The institution must be federally insured or regulated; and
- The mortgage loan must have been insured, guaranteed, or supplemented by a federal agency or intended for sale to Fannie Mae or Freddie Mac.

[29] Prior to that year, the law had to be periodically reauthorized by Congress.
[30] 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.

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

1) The institution must be a for-profit organization;
2) The institution's home purchase loan originations must equal or exceed 10 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 on property located in an MSA in the preceding calendar year; and
4) The institution must have assets exceeding $10 million or have originated 100 or more home purchases in the preceding calendar year.

In addition to reporting race and ethnicity data for loan applicants, the HMDA reporting requirements were modified 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:

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

The following discussion will focus on trends in home lending from 2008 through 2014, the most current year for which HMDA data are available.

THE CITY OF CASPER

Lending institutions handled a total of 27,477 loans and loan applications in the City of Casper from 2008 through 2014, as shown in Table IV.23 on the following page. Around 45 percent of those loans or loan applications were intended to finance the purchase of a home.

Table IV.23
Purpose of Loan by Year
City of Casper
2008–2014 HMDA Data

Purpose	2008	2009	2010	2011	2012	2013	2014	Total
Home Purchase	1,899	1,463	1,399	1,453	2,044	2,150	2,166	12,574
Home Improvement	463	282	212	149	196	183	155	1,640
Refinancing	2,150	2,763	1,782	1,410	2,236	1,885	1,037	13,263
Total	**4,512**	**4,508**	**3,393**	**3,012**	**4,476**	**4,218**	**3,358**	**27,477**

The overwhelming majority of home purchase loan applications in the City of Casper were owner-occupied loan applications. As shown in Table IV.24 below, well over 11,000 loans were intended to finance a purchase of an owner-occupied home in the city, or around 92 percent of all home purchase loans.

Table IV.24
Occupancy Status for Home Purchase Loan Applications
City of Casper
2008–2014 HMDA Data

Status	2008	2009	2010	2011	2012	2013	2014	Total
Owner-Occupied	1,725	1,365	1,304	1,310	1,881	1,981	2,023	11,589
Not Owner-Occupied	168	82	89	135	153	159	138	924
Not Applicable	6	16	6	8	10	10	5	61
Total	**1,899**	**1,463**	**1,399**	**1,453**	**2,044**	**2,150**	**2,166**	**12,574**

More than 7,000 owner-occupied home purchase loan applications in the city of Casper led to successful loan originations, as shown in Table IV.25 below. Nearly 800 were denied, for an overall denial rate of 9.8 percent in the city from 2008 through 2014.

Table IV.25
Loan Applications by Action Taken
City of Casper
2004–2014 HMDA Data

Action	2008	2009	2010	2011	2012	2013	2014	Total
Loan Originated	1,084	839	727	759	1,174	1,213	1,318	7,114
Application Approved but not Accepted	76	39	50	44	39	45	27	320
Application Denied	172	59	76	98	148	123	100	776
Application Withdrawn by Applicant	77	47	48	60	97	138	120	587
File Closed for Incompleteness	3	3	4	4	5	3	7	29
Loan Purchased by the Institution	313	378	399	345	418	459	451	2,763
Preapproval Request Denied	0	0	0	0	0	0	0	0
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0
Total	**1,725**	**1,365**	**1,304**	**1,310**	**1,881**	**1,981**	**2,023**	**11,589**
Denial Rate	**13.7%**	**6.6%**	**9.5%**	**11.4%**	**11.2%**	**9.2%**	**7.1%**	**9.8%**

Credit history was the most common factor in loan denial rates in the city of Casper, where it was cited in over a quarter of all denials. As shown in Table IV.26 on the following page, debt-to-income ratio was also a prominent factor in loan denials in Casper.

Table IV.26
Loan Applications by Reason for Denial
City of Casper
2004–2014 HMDA Data

Denial Reason	2008	2009	2010	2011	2012	2013	2014	Total
Debt-to-Income Ratio	30	8	19	27	30	20	23	157
Employment History	4	0	2	8	6	5	2	27
Credit History	50	19	22	24	48	23	10	196
Collateral	15	8	7	9	10	10	10	69
Insufficient Cash	5	2	1	2	4	9	0	23
Unverifiable Information	0	4	1	4	6	6	1	22
Credit Application Incomplete	17	1	2	4	4	4	4	36
Mortgage Insurance Denied	0	0	0	0	0	0	0	0
Other	6	3	2	4	11	7	12	45
Missing	45	14	20	16	29	39	38	201
Total	**172**	**59**	**76**	**98**	**148**	**123**	**100**	**776**

American Indian and black applicants saw higher-than-average denial rates in the City of Casper from 2008 through 2014, as shown in Table IV.27 below. A third of loan applications from American Indian applicants were denied during that time period, along with 12.5 percent of applications from black applicants. The denial rate for white applicants averaged 9.2 percent over the six-year period, while Asian applicants were turned down in 5.1 percent of owner-

occupied home purchase loan applications. The denial rate for Hispanic applicants, at 13.8 percent, was nearly five percentage points higher than the denial rate for non-Hispanic applicants.

Table IV.27
Denial Rates by Race/Ethnicity of Applicant
City of Casper
2004–2014 HMDA Data

Race/Ethnicity	2008	2009	2010	2011	2012	2013	2014	Average
American Indian	14.3%	33.3%	77.8%	25.0%	37.5%	0.0%	0.0%	33.3%
Asian	0.0%	0.0%	0.0%	33.3%	14.3%	8.3%	8.3%	5.1%
Black	33.3%	0.0%	0.0%	0.0%	0.0%	33.3%	14.3%	12.5%
White	13.6%	6.6%	8.4%	10.9%	9.7%	8.5%	6.6%	9.2%
Not Available	19.4%	5.3%	11.8%	16.9%	44.9%	22.2%	15.0%	18.9%
Not Applicable	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Average	**13.7%**	**6.6%**	**9.5%**	**11.4%**	**11.2%**	**9.2%**	**7.1%**	**9.8%**
Non-Hispanic	13.3%	6.6%	8.9%	10.4%	9.2%	7.8%	6.5%	8.9%
Hispanic	18.4%	8.3%	18.8%	17.1%	12.2%	19.6%	5.1%	13.8%

The overall denial rate for female applicants in the City of Casper was 11.5 percent from 2008 through 2014. As shown in Table IV.28 on the following page, this was 2.6 percentage points higher than the denial rate for male applicants over the same time period.

Table IV.28
Denial Rates by Gender of Applicant
City of Casper
2004–2013 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2008	13.8%	12.8%	19.0%	0.0%	13.7%
2009	4.9%	11.3%	3.4%	0.0%	6.6%
2010	8.7%	10.5%	11.5%	0.0%	9.5%
2011	10.6%	14.6%	7.3%	0.0%	11.4%
2012	10.5%	10.7%	40.7%	0.0%	11.2%
2013	7.7%	12.4%	20.5%	0.0%	9.2%
2014	5.8%	9.2%	21.4%	0.0%	7.1%
Average	**8.9%**	**11.5%**	**16.3%**	**0.0%**	**9.8%**

The effect of income on the denial rate was more pronounced: from 65.2 percent for applicants with incomes of $15,000 per year or less, the denial rate fell to 7.4 percent for those with annual incomes above $75,000 per year, as shown in Table IV.29 below.

Table IV.29
Denial Rates by Income of Applicant
City of Casper
2004–2013 HMDA Data

Income	2008	2009	2010	2011	2012	2013	2014	Total
$15,000 or Below	0.0%	100.0%	57.1%	25.0%	100.0%	66.7%	100.0%	65.2%
$15,001–$30,000	38.1%	17.3%	26.8%	19.8%	23.9%	16.9%	11.1%	23.2%
$30,001–$45,000	13.8%	6.9%	5.8%	13.6%	11.9%	12.8%	9.7%	10.8%
$45,001–$60,000	10.7%	4.2%	9.2%	8.4%	9.4%	8.2%	5.5%	8.0%
$60,001–$75,000	8.4%	6.7%	6.9%	12.7%	10.2%	7.4%	8.1%	8.5%
Above $75,000	11.6%	3.9%	5.0%	8.6%	9.1%	7.1%	5.5%	7.4%
Data Missing	25.0%	18.2%	.0%	.0%	10.0%	18.2%	6.3%	12.9%
Total	**13.7%**	**6.6%**	**9.5%**	**11.4%**	**11.2%**	**9.2%**	**7.1%**	**9.8%**

White and Asian applicants often saw lower denial rates in each year and income category than applicants as a whole. However, because there were relatively few applicants in each year and income category, it is difficult to assess the impact of race and ethnicity on denial rates when income is taken into account. Denial rates were generally higher for Hispanic than for non-Hispanic applicants, regardless of income, as shown in Table IV.30 below. However, the denial rate for Hispanic applicants earning more than $75,000 per year, at 3.1 percent, was less than half of the denial rate for non-Hispanic applicants.

Table IV.30
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
City of Casper
2004–2013 HMDA Data

Race	<= $15K	$15K–$30K	$30K–$45K	$45K–$60K	$60K–$75K	Above $75K	Data Missing	Average
American Indian	100.0%	66.7%	28.6%	40.0%	0.0%	25.0%	0.0%	33.3%
Asian	0.0%	12.5%	5.6%	5.6%	0.0%	4.2%	0.0%	5.1%
Black	0.0%	0.0%	12.5%	0.0%	0.0%	25.0%	0.0%	12.5%
White	63.2%	22.1%	10.2%	7.1%	8.6%	6.9%	12.2%	9.2%
Not Available	66.7%	35.9%	19.8%	20.4%	11.1%	12.9%	33.3%	18.9%
Not Applicable	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Average	**65.2%**	**23.2%**	**10.8%**	**8.0%**	**8.5%**	**7.4%**	**12.9%**	**9.8%**
Non-Hispanic	56.3%	21.8%	9.6%	7.1%	8.0%	6.9%	13.4%	8.9%
Hispanic	100.0%	25.0%	18.7%	15.5%	8.6%	3.1%	.0%	13.8%

HAL rates were relatively high in the City of Casper in 2008, as well as in 2009, when 8 percent or more of owner-occupied home purchase loans carried high annual percentage rates. By 2014, the HAL rate had fallen to 1.2 percent. The overall HAL rate in Casper from 2008 through 2014 was 3.9 percent, as shown in Table IV.31 below.

Table IV.31
Originated Owner-Occupied Loans by HAL Status
City of Casper
2004–2013 HMDA Data

Loan Type	2008	2009	2010	2011	2012	2013	2014	Total
Other	991	772	719	724	1,134	1,197	1,302	6,839
HAL	93	67	8	35	40	16	16	275
Total	**1,084**	**839**	**727**	**759**	**1,174**	**1,213**	**1,318**	**7,114**
Percent HAL	8.6%	8.0%	1.1%	4.6%	3.4%	1.3%	1.2%	3.9%

A quarter of loans issued to American Indian borrowers from 2008 through 2014 in the City of Casper were HALs, as shown in Table IV.32 below. All other racial groups saw HAL rates that were considerably lower: 5.4 percent for Asian borrowers, 3.6 percent for black borrowers, and 3.7 percent for white borrowers. The HAL rate for Hispanic borrowers in the City of Casper, at 8 percent, was more than twice the HAL rate for non-Hispanic applicants.

Table IV.32
Rate of HALs Originated by Race/Ethnicity of Borrower
City of Casper
2004–2013 HMDA Data

Race	2008	2009	2010	2011	2012	2013	2014	Average
American Indian	33.3%	0.0%	50.0%	50.0%	20.0%	0.0%	0.0%	25.0%
Asian	8.0%	0.0%	0.0%	0.0%	0.0%	9.1%	9.1%	5.4%
Black	0.0%	0.0%	0.0%	20.0%	0.0%	0.0%	0.0%	3.6%
White	8.6%	8.2%	1.1%	4.2%	2.8%	1.3%	0.9%	3.7%
Not Available	6.0%	5.6%	0.0%	4.1%	25.9%	0.0%	7.8%	5.2%
Not Applicable	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Average	**8.6%**	**8.0%**	**1.1%**	**4.6%**	**3.4%**	**1.3%**	**1.2%**	**3.9%**
Non-Hispanic	8.3%	7.8%	1.3%	4.4%	2.4%	1.3%	1.0%	3.6%
Hispanic	19.4%	18.2%	.0%	6.9%	8.3%	2.7%	5.4%	8.0%

The HAL rate in Casper fell from 12.5 percent for borrowers with incomes of $15,000 per year or less to 3.0 percent for those in the $60,000 to $75,000 per year income bracket. Unusually, the HAL rate was slightly higher among borrowers in the highest income category, at 3.6 percent, as shown in Table IV.33 below.

Table IV.33
Rates of HALs by Income of Borrower
City of Casper
2004–2013 HMDA Data

Income	2008	2009	2010	2011	2012	2013	2014	Average
$15,000 or Below	0.0%	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%	12.5%
$15,001–$30,000	13.3%	4.8%	1.4%	8.2%	8.6%	4.7%	2.1%	6.3%
$30,001–$45,000	8.0%	7.4%	1.0%	5.8%	4.1%	0.5%	0.9%	4.1%
$45,001 -$60,000	8.4%	5.3%	3.2%	4.6%	4.0%	0.0%	0.7%	3.8%
$60,001–$75,000	5.9%	10.3%	0.0%	2.9%	1.9%	1.0%	0.5%	3.0%
Above $75,000	9.8%	11.1%	0.0%	3.5%	2.6%	1.9%	1.6%	3.6%
Data Missing	8.3%	11.1%	0.0%	0.0%	0.0%	0.0%	6.7%	4.1%
Average	**8.6%**	**8.0%**	**1.1%**	**4.6%**	**3.4%**	**1.3%**	**1.2%**	**3.9%**

THE CITY OF CHEYENNE

In Cheyenne, lending institutions handled a total of 36,654 loans and loan applications, as shown in Table IV.34 below. A majority of these loan applications were intended to refinance an existing mortgage. However, 14,660 loans and loan applications were intended to finance the purchase of a home.

Table IV.34
Purpose of Loan by Year
City of Cheyenne
2008–2014 HMDA Data

Purpose	2008	2009	2010	2011	2012	2013	2014	Total
Home Purchase	2,103	2,101	1,830	1,884	2,044	2,335	2,363	14,660
Home Improvement	331	228	186	228	251	243	252	1,719
Refinancing	2,818	4,202	3,170	2,501	3,500	2,754	1,330	20,275
Total	**5,252**	**6,531**	**5,186**	**4,613**	**5,795**	**5,332**	**3,945**	**36,654**

Of the 14,660 home purchase loans and loan applications in Cheyenne, over 13,400 were intended to finance the purchase of a home in which the applicant intended to live, as shown in Table IV.35 below. These owner-occupied loans accounted for more than 90 percent of all home purchase loans in the city from 2008 through 2014.

Table IV.35
Occupancy Status for Home Purchase Loan Applications
City of Cheyenne
2008–2014 HMDA Data

Status	2008	2009	2010	2011	2012	2013	2014	Total
Owner-Occupied	1,916	1,987	1,711	1,740	1,844	2,064	2,147	13,409
Not Owner-Occupied	184	108	112	136	197	260	192	1,189
Not Applicable	3	6	7	8	3	11	24	62
Total	**2,103**	**2,101**	**1,830**	**1,884**	**2,044**	**2,335**	**2,363**	**14,660**

As shown in Table IV.36 below, some 7,483 owner-occupied loans were originated, and 732 denied, for an overall denial rate of 8.9 percent.

Table IV.36
Loan Applications by Action Taken
City of Cheyenne
2004–2014 HMDA Data

Action	2008	2009	2010	2011	2012	2013	2014	Total
Loan Originated	1,085	1,049	868	906	1,069	1,200	1,306	7,483
Application Approved but not Accepted	43	23	26	49	44	37	47	269
Application Denied	102	53	96	118	118	130	115	732
Application Withdrawn by Applicant	106	92	74	85	74	120	111	662
File Closed for Incompleteness	6	8	9	4	4	10	10	51
Loan Purchased by the Institution	574	762	638	578	535	567	558	4,212
Preapproval Request Denied	0	0	0	0	0	0	0	0
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0
Total	**1,916**	**1,987**	**1,711**	**1,740**	**1,844**	**2,064**	**2,147**	**13,409**
Denial Rate	**8.6%**	**4.8%**	**10.0%**	**11.5%**	**9.9%**	**9.8%**	**8.1%**	**8.9%**

Credit history was the most commonly cited reason for loan denials in the City of Cheyenne, just edging out debt-to-income ratio, as shown in Table IV.37 on the following page. Both were cited as primary factors in around 18 percent of all denied loans.

Table IV.37
Loan Applications by Reason for Denial
City of Cheyenne
2004–2014 HMDA Data

Denial Reason	2008	2009	2010	2011	2012	2013	2014	Total
Debt-to-Income Ratio	25	5	16	19	22	21	22	130
Employment History	5	7	4	6	4	5	3	34
Credit History	17	15	20	24	19	24	15	134
Collateral	12	6	10	10	8	11	7	64
Insufficient Cash	3	4	6	2	2	4	9	30
Unverifiable Information	2	0	4	3	7	5	4	25
Credit Application Incomplete	3	1	6	8	6	10	8	42
Mortgage Insurance Denied	0	0	2	0	0	0	0	2
Other	12	6	5	6	9	8	5	51
Missing	23	9	23	40	41	42	42	220
Total	**102**	**53**	**96**	**118**	**118**	**130**	**115**	**732**

As shown in Table IV.38 below, nearly a quarter of applications from American Indian applicants were denied, along with 12.5 percent of applications from black applicants. By comparison, white and Asian applicants saw denial rates of 8.3 and 8.6 percent, respectively. The overall denial rate for Hispanic applicants, at 11.5 percent, exceeded that of non-Hispanic applicants by nearly four percentage points.

Table IV.38
Denial Rates by Race/Ethnicity of Applicant
City of Cheyenne
2004–2014 HMDA Data

Race/Ethnicity	2008	2009	2010	2011	2012	2013	2014	Average
American Indian	25.0%	16.7%	25.0%	14.3%	33.3%	25.0%	33.3%	24.5%
Asian	10.5%	0.0%	0.0%	10.0%	6.7%	7.1%	19.0%	8.6%
Black	14.3%	0.0%	15.4%	0.0%	20.0%	21.1%	13.8%	12.2%
White	7.8%	4.8%	9.2%	11.0%	9.0%	9.5%	7.1%	8.3%
Not Available	20.7%	7.4%	19.0%	25.5%	31.8%	10.6%	17.6%	18.2%
Not Applicable	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Average	**8.6%**	**4.8%**	**10.0%**	**11.5%**	**9.9%**	**9.8%**	**8.1%**	**8.9%**
Non-Hispanic	8.1%	4.6%	7.9%	10.1%	8.0%	8.7%	6.7%	7.7%
Hispanic	9.2%	6.8%	20.5%	9.8%	16.1%	8.7%	10.1%	11.5%

The gap between male and female loan applicants was considerably smaller in Cheyenne than in the City of Casper, where denial rates were concerned. As shown in Table IV.39 on the following page, the denial rate for female applicants, at 9 percent, was less than half a percentage point higher than the denial rate for male applicants.

Table IV.39
Denial Rates by Gender of Applicant
City of Cheyenne
2004–2013 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2008	7.6%	10.4%	16.0%	0.0%	8.6%
2009	4.8%	4.4%	11.1%	0.0%	4.8%
2010	10.5%	8.8%	10.0%	0.0%	10.0%
2011	11.1%	11.0%	26.7%	0.0%	11.5%
2012	9.2%	11.0%	22.7%	0.0%	9.9%
2013	9.5%	10.4%	10.3%	0.0%	9.8%
2014	8.0%	7.6%	13.6%	0.0%	8.1%
Average	**8.6%**	**9.0%**	**15.0%**	**0.0%**	**8.9%**

Income also had an impact on denial rates in Cheyenne, as shown in Table IV.40 below. Applicants in the lowest income bracket, with a denial rate of 58.1 percent, were more likely to be issued a loan in Cheyenne than in Casper. In the highest income bracket, only 6.6 percent of applications were turned down.

Table IV.40
Denial Rates by Income of Applicant
City of Cheyenne
2004–2013 HMDA Data

Income	2008	2009	2010	2011	2012	2013	2014	Total
$15,000 or Below	100.0%	0.0%	60.0%	66.7%	100.0%	50.0%	33.3%	58.1%
$15,001–$30,000	25.5%	8.5%	18.7%	23.3%	32.4%	20.0%	21.3%	21.5%
$30,001–$45,000	6.9%	5.1%	11.2%	12.5%	10.4%	11.9%	10.4%	9.7%
$45,001–$60,000	5.5%	4.1%	7.9%	8.2%	7.7%	6.7%	7.6%	6.7%
$60,001–$75,000	5.8%	3.5%	9.6%	9.7%	6.0%	10.6%	7.7%	7.5%
Above $75,000	8.2%	4.8%	6.9%	8.2%	5.4%	8.1%	5.3%	6.6%
Data Missing	10.0%	0.0%	40.0%	28.6%	37.5%	0.0%	21.4%	18.6%
Total	**8.6%**	**4.8%**	**10.0%**	**11.5%**	**9.9%**	**9.8%**	**8.1%**	**8.9%**

In Cheyenne, it was often the case that white applicants experienced lower denial rates than applicants of other racial groups, though denial rates for high-income Asian applicants were

lower than for high-income white residents. Denial rates for Hispanic applicants were higher than those of non-Hispanic applicants in most income categories, as shown in Table IV.41 below. However, this was not true of applicants in the $60,000 to $75,000 per year income bracket.

Table IV.41
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
City of Cheyenne
2004–2013 HMDA Data

Race	<= $15K	$15K–$30K	$30K–$45K	$45K–$60K	$60K–$75K	Above $75K	Data Missing	Average
American Indian	100.0%	60.0%	36.4%	21.4%	0.0%	7.1%	0.0%	24.5%
Asian	0.0%	28.6%	5.6%	8.8%	8.3%	5.9%	0.0%	8.6%
Black	0.0%	27.3%	12.5%	16.7%	13.6%	0.0%	0.0%	12.2%
White	50.0%	20.1%	9.1%	6.0%	7.2%	6.2%	20.4%	8.3%
Not Available	100.0%	36.4%	21.5%	15.1%	11.3%	15.6%	0.0%	18.2%
Not Applicable	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Average	**58.1%**	**21.5%**	**9.7%**	**6.7%**	**7.5%**	**6.6%**	**18.6%**	**8.9%**
Non-Hispanic	47.6%	17.9%	8.5%	5.9%	7.2%	5.7%	17.6%	7.7%
Hispanic	83.3%	21.5%	10.7%	7.5%	5.6%	11.6%	50.0%	11.5%

The overall HAL rate in Cheyenne was relatively low: 1.2 percent from 2008 through 2014, as shown in Table IV.42 below. In fact, the HAL rate was below one percent in the last three years included in the study, down from 3.6 percent in 2008.

Table IV.42
Originated Owner-Occupied Loans by HAL Status
City of Cheyenne
2004–2013 HMDA Data

Loan Type	2008	2009	2010	2011	2012	2013	2014	Total
Other	1,046	1,034	865	896	1,059	1,194	1,300	7,394
HAL	39	15	3	10	10	6	6	89
Total	**1,085**	**1,049**	**868**	**906**	**1,069**	**1,200**	**1,306**	**7,483**
Percent HAL	3.6%	1.4%	.3%	1.1%	.9%	.5%	.5%	1.2%

HAL rates were comparatively low regardless of race or ethnicity. As shown in Table IV.43 below, high annual percentage rate loans accounted for no more than 2.8 percent of loans issued to any racial or ethnic group.

Table IV.43
Rate of HALs Originated by Race/Ethnicity of Borrower
City of Cheyenne
2004–2013 HMDA Data

Race	2008	2009	2010	2011	2012	2013	2014	Average
American Indian	0.0%	20.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.7%
Asian	11.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	2.1%
Black	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
White	3.7%	1.5%	0.4%	1.1%	1.0%	0.5%	0.3%	1.2%
Not Available	0.0%	0.0%	0.0%	2.9%	0.0%	0.0%	3.6%	0.9%
Not Applicable	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Average	**3.6%**	**1.4%**	**0.3%**	**1.1%**	**0.9%**	**0.5%**	**0.5%**	**1.2%**
Non-Hispanic	3.6%	1.4%	0.1%	0.8%	0.7%	0.4%	0.3%	1.0%
Hispanic	4.5%	2.9%	3.4%	5.4%	1.3%	1.2%	1.3%	2.8%

There were no HALs issued to borrowers earning $15,000 per year or less from 2008 through 2014 in Cheyenne, as shown in Table IV.44 below. However, above $15,000 per year HAL

rates generally followed the same pattern observed in Casper, i.e., the higher the income, the lower the incidence of HALs.

Table IV.44
Rates of HALs by Income of Borrower
City of Cheyenne
2004–2013 HMDA Data

Income	2008	2009	2010	2011	2012	2013	2014	Average
$15,000 or Below	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
$15,001–$30,000	6.3%	2.1%	3.3%	1.3%	4.3%	1.3%	0.0%	2.8%
$30,001–$45,000	2.5%	1.6%	.0%	1.0%	1.3%	1.3%	0.9%	1.3%
$45,001 -$60,000	4.5%	1.6%	.5%	1.4%	.8%	0.3%	0.3%	1.4%
$60,001–$75,000	4.9%	1.2%	.0%	2.5%	.0%	0.0%	0.4%	1.2%
Above $75,000	1.8%	1.1%	.0%	.4%	.6%	0.3%	0.4%	0.6%
Data Missing	11.1%	.0%	.0%	.0%	.0%	0.0%	0.0%	2.1%
Average	**3.6%**	**1.4%**	**.3%**	**1.1%**	**.9%**	**0.5%**	**0.5%**	**1.2%**

THE STATE OF WYOMING

As shown below in Table IV.45, banks and other lending institutions handled nearly 230,000 home loans and loan applications from 2008 through 2014. A majority of these were refinance loans, though more than 88,000 were intended to finance the purchase of a home.

Table IV.45
Purpose of Loan by Year
State of Wyoming
2008–2014 HMDA Data

Purpose	2008	2009	2010	2011	2012	2013	2014	Total
Home Purchase	13,173	11,575	10,905	11,307	12,618	14,028	14,606	88,212
Home Improvement	3,536	2,442	1,710	1,466	1,617	1,619	1,478	13,868
Refinancing	19,039	27,642	19,420	15,692	19,857	17,309	8,694	127,653
Total	**35,748**	**41,659**	**32,035**	**28,465**	**34,092**	**32,956**	**24,778**	**229,733**

As shown in Table IV.46 below, more than 80,000 home purchase loan applications throughout the state were intended to finance the purchase of a home in which the prospective borrower intended to live. These "owner-occupied" home purchase loans accounted for more than 90 percent of all home purchase loans in the state from 2008 through 2014. As shown in Table IV.46, 36,904 were conventional loans, or around 45 percent.

Table IV.46
Occupancy Status for Home Purchase Loan Applications
State of Wyoming
2008–2014 HMDA Data

Status	2008	2009	2010	2011	2012	2013	2014	Total
Owner-Occupied	11,800	10,757	10,057	10,293	11,448	12,752	13,326	80,433
Not Owner-Occupied	1,334	754	793	957	1,107	1,216	1,213	7,374
Not Applicable	39	64	55	57	63	60	67	405
Total	**13,173**	**11,575**	**10,905**	**11,307**	**12,618**	**14,028**	**14,606**	**88,212**

Around 43,500 owner-occupied home purchase loan applications were approved and originated from 2008 through 2014, as shown in Table IV.47 below. At the same time around 7,200 were turned down, for an overall denial rate of 14.2 percent. The denial rate topped 16 percent in 2008, at the midst of the recent national recession. Since that time, denial rates have

fallen. In 2014, approximately 12.8 percent of owner-occupied home purchase loan applications were denied.

Table IV.47
Loan Applications by Action Taken
State of Wyoming
2004–2014 HMDA Data

Action	2008	2009	2010	2011	2012	2013	2014	Total
Loan Originated	6,683	5,678	4,946	5,315	6,356	7,015	7,463	43,456
Application Approved but not Accepted	457	305	383	395	344	315	343	2,542
Application Denied	1,352	819	891	964	995	1,097	1,091	7,209
Application Withdrawn by Applicant	582	445	427	422	488	771	789	3,924
File Closed for Incompleteness	94	66	74	53	40	66	68	461
Loan Purchased by the Institution	2,632	3,442	3,336	3,144	3,225	3,488	3,572	22,839
Preapproval Request Denied	0	2	0	0	0	0	0	2
Preapproval Approved but not Accepted	0	0	0	0	0	0	0	0
Total	**11,800**	**10,757**	**10,057**	**10,293**	**11,448**	**12,752**	**13,326**	**80,433**
Denial Rate	**16.8%**	**12.6%**	**15.3%**	**15.4%**	**13.5%**	**13.5%**	**12.8%**	**14.2%**

Banks and other lending institutions most commonly cited credit history as a primary reason in the decision to deny a loan application. As shown in Table IV.48 below, some 1,539 loan applications were denied in part due to the applicant's credit history. The next most common factor in loan denials at the state level was the debt-to-income ratios of prospective borrowers.

Table IV.48
Loan Applications by Reason for Denial
State of Wyoming
2004–2014 HMDA Data

Denial Reason	2008	2009	2010	2011	2012	2013	2014	Total
Debt-to-Income Ratio	199	119	140	166	173	154	169	1,120
Employment History	35	30	30	39	42	21	13	210
Credit History	324	201	208	238	244	177	147	1,539
Collateral	160	102	121	111	99	124	129	846
Insufficient Cash	34	26	23	24	15	34	28	184
Unverifiable Information	19	22	25	21	27	32	31	177
Credit Application Incomplete	73	31	34	37	40	71	46	332
Mortgage Insurance Denied	3	3	8	1	2	0	2	19
Other	81	70	62	37	56	68	51	425
Missing	424	215	240	290	297	416	475	2,357
Total	**1,352**	**819**	**891**	**964**	**995**	**1,097**	**1,091**	**7,209**

Lending outcomes varied considerably according to the race or ethnicity of the loan applicant. As shown in Table IV.49 below, American Indian and black applicants were more likely to be denied a home purchase loan than white or Asian applicants. The denial rate for American Indian applicants, at 31.4 percent, was more than twice as high as denial rates for white and Asian residents, which were both consistently below the overall average denial rate. More than a fifth of applications from Hispanic loan applicants ended in denial, compared to 12.9 percent for non-Hispanic loan applicants.

Table IV.49
Denial Rates by Race/Ethnicity of Applicant
State of Wyoming
2004–2014 HMDA Data

Race/Ethnicity	2008	2009	2010	2011	2012	2013	2014	Average
American Indian	38.2%	40.0%	35.4%	17.1%	25.6%	34.0%	27.4%	31.4%
Asian	15.1%	9.3%	14.1%	9.1%	12.5%	9.8%	9.9%	11.8%
Black	26.7%	3.6%	14.3%	5.7%	25.0%	21.7%	16.7%	16.7%
White	16.3%	12.2%	14.9%	14.3%	12.5%	12.5%	12.0%	13.5%
Not Available	24.0%	16.8%	18.0%	32.5%	30.0%	26.9%	21.6%	24.2%
Not Applicable	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Average	**16.8%**	**12.6%**	**15.3%**	**15.4%**	**13.5%**	**13.5%**	**12.8%**	**14.2%**
Non-Hispanic	16.2%	12.2%	14.1%	13.2%	11.6%	11.7%	11.5%	12.9%
Hispanic	23.2%	15.4%	27.9%	20.5%	22.5%	18.0%	17.6%	20.7%

Denial rates also varied according to the gender of the applicant. As shown in Table IV.50 on the following page, female applicants experienced a denial rate of 16.3 percent from 2008 through 2014. The denial rate for male applicants was over three percentage points lower, at 13.2 percent over the six-year period. The discrepancy between the two was at its widest in 2011, when the denial rate for female applicants was 4.6 percentage points higher than that of male applicants.

Table IV.50
Denial Rates by Gender of Applicant
State of Wyoming
2004–2013 HMDA Data

Year	Male	Female	Not Available	Not Applicable	Average
2008	16.1%	18.9%	20.1%	0.0%	16.8%
2009	11.8%	14.3%	17.4%	0.0%	12.6%
2010	14.7%	17.2%	14.3%	0.0%	15.3%
2011	13.8%	18.4%	26.1%	0.0%	15.4%
2012	12.8%	14.2%	24.9%	0.0%	13.5%
2013	12.2%	15.8%	25.2%	0.0%	13.5%
2014	11.5%	15.4%	20.8%	0.0%	12.8%
Average	**13.2%**	**16.3%**	**21.1%**	**0.0%**	**14.2%**

Given the relative prominence of debt-to-income ratios as a factor in the decision to deny a loan, it is unsurprising that the denial rate fell as the income of the applicant increased. As shown in Table IV.51 below, more than two-thirds of loan applications were denied to applicants whose income was at or below $15,000 per year. That denial rate fell with entry into higher income brackets, to 11.3 percent for those with incomes above $75,000 per year.

Table IV.51
Denial Rates by Income of Applicant
State of Wyoming
2004–2013 HMDA Data

Income	2008	2009	2010	2011	2012	2013	2014	Total
$15,000 or Below	60.5%	53.3%	62.9%	71.4%	85.3%	57.1%	77.3%	66.9%
$15,001–$30,000	38.1%	24.0%	29.8%	31.9%	29.0%	27.4%	32.6%	30.5%
$30,001–$45,000	17.2%	13.9%	16.7%	17.4%	14.9%	16.6%	17.4%	16.3%
$45,001–$60,000	14.1%	11.3%	13.9%	14.8%	12.6%	10.3%	11.7%	12.6%
$60,001–$75,000	14.2%	11.0%	12.6%	12.8%	10.5%	12.9%	10.9%	12.1%
Above $75,000	15.0%	9.9%	11.7%	10.5%	10.8%	11.7%	9.8%	11.3%
Data Missing	16.7%	23.6%	33.3%	19.6%	22.8%	24.6%	16.7%	21.3%
Total	**16.8%**	**12.6%**	**15.3%**	**15.4%**	**13.5%**	**13.5%**	**12.8%**	**14.2%**

Differences in denial rates persisted between applicants for different races and ethnicities, even when income was taken into account, as shown in Table IV.52 on the following page. Entry into higher income brackets also had a more pronounced effect among white and Asian applicants than American Indian applicants, especially at the lower end of the income scale. Differences in denial rate were smaller in higher income ranges; however, the denial rate for American Indian applicants was still more than twice as high for American Indian applicants earning more than $75,000 per year as for black, white, or Asian applicants in the same income range. In terms of ethnicity, Hispanic applicants earning more than $75,000 per year were denied 14.5 percent of the time, compared to a denial rate of 10.4 percent for non-Hispanic applicants.

Table IV.52
Denial Rates of Loans by Race/Ethnicity and Income of Applicant
State of Wyoming
2004–2013 HMDA Data

Race	<= $15K	$15K–$30K	$30K–$45K	$45K–$60K	$60K–$75K	Above $75K	Data Missing	Average
American Indian	66.7%	61.1%	44.2%	28.0%	17.9%	23.6%	50.0%	31.4%
Asian	100.0%	24.1%	15.3%	9.9%	7.7%	7.6%	100.0%	11.8%
Black	0.0%	42.1%	22.8%	15.9%	12.0%	9.6%	0.0%	16.7%
White	64.3%	29.0%	15.5%	11.8%	11.7%	10.7%	21.0%	13.5%
Not Available	83.3%	47.2%	25.4%	24.3%	19.4%	19.5%	34.5%	24.2%
Not Applicable	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Average	**66.9%**	**30.5%**	**16.3%**	**12.6%**	**12.1%**	**11.3%**	**21.3%**	**14.2%**
Non-Hispanic	61.5%	27.1%	14.7%	11.5%	11.2%	10.4%	20.6%	12.9%
Hispanic	76.5%	39.8%	22.7%	16.9%	18.8%	14.5%	31.3%	20.7%

Loan applicants who were able to successfully secure a loan were occasionally issued a loan with a high annual percentage rate. As noted previously, home loans are designated as "high-annual percentage rate" loans (HALs) where the annual percentage rate on the loan exceeds that of a comparable treasury instruments by at least three percentage points. As shown in Table IV.53 below, these HALs accounted for 4.5 percent of all home purchase loans issued in the state from 2008 through 2014. HAL rates were highest in 2008, at the height of the national recession, when 10.9 percent of home purchase loans carried high annual percentage rates.

Table IV.53
Originated Owner-Occupied Loans by HAL Status
State of Wyoming
2004–2013 HMDA Data

Loan Type	2008	2009	2010	2011	2012	2013	2014	Total
Other	5,957	5,274	4,816	5,065	6,131	6,891	7,372	41,506
HAL	726	404	130	250	225	124	91	1,950
Total	**6,683**	**5,678**	**4,946**	**5,315**	**6,356**	**7,015**	**7,463**	**43,456**
Percent HAL	10.9%	7.1%	2.6%	4.7%	3.5%	1.8%	1.2%	4.5%

As had been the case with loan denials, American Indian borrowers were more heavily impacted by HALs than borrowers of other races, though it should be noted that there were relatively few loans of any type issued to American Indian borrowers from 2008 through 2014. As shown in Table IV.54 below, the overall HAL rate for black borrowers, at 1.8 percent, was below that of Asian and white borrowers, who saw HAL rates of 4.4 and 4.2 percent, respectively. The overall HAL rate for Hispanic borrowers, at 8.0 percent, was nearly twice that of non-Hispanic borrowers.

Table IV.54
Rate of HALs Originated by Race/Ethnicity of Borrower
State of Wyoming
2004–2013 HMDA Data

Race	2008	2009	2010	2011	2012	2013	2014	Average
American Indian	26.5%	18.5%	9.7%	20.6%	15.6%	6.5%	11.1%	15.4%
Asian	10.1%	2.0%	1.6%	3.3%	4.8%	3.6%	1.6%	4.2%
Black	0.0%	0.0%	0.0%	6.1%	0.0%	5.6%	0.0%	1.8%
White	10.9%	7.2%	2.7%	4.4%	3.2%	1.7%	1.0%	4.4%
Not Available	8.9%	5.3%	1.4%	9.3%	9.1%	2.8%	3.0%	5.2%
Not Applicable	25.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	4.0%
Average	**10.9%**	**7.1%**	**2.6%**	**4.7%**	**3.5%**	**1.8%**	**1.2%**	**4.5%**
Non-Hispanic	10.6%	6.9%	2.6%	4.0%	2.7%	1.4%	0.9%	4.1%
Hispanic	13.7%	11.8%	5.5%	10.0%	6.7%	6.1%	3.5%	8.0%

Like denial rates, the incidence of HALs tended to fall as the income of the borrower increased. As shown in Table IV.55 below, more than 16.7 percent of loans issued to borrowers earning $15,000 per year or less carried high annual percentage rates. As incomes rose, HAL rates fell, to 3.9 percent for borrowers earning more than $75,000 per year.

Table IV.55
Rates of HALs by Income of Borrower
State of Wyoming
2004–2013 HMDA Data

Income	2008	2009	2010	2011	2012	2013	2014	Average
$15,000 or Below	33.3%	21.4%	7.7%	21.4%	0.0%	8.3%	0.0%	16.7%
$15,001–$30,000	13.9%	7.3%	4.5%	10.9%	11.1%	3.2%	3.6%	8.0%
$30,001–$45,000	10.4%	6.4%	3.4%	6.0%	5.4%	2.1%	2.0%	5.3%
$45,001 -$60,000	10.5%	6.5%	2.2%	5.1%	3.5%	1.2%	1.2%	4.4%
$60,001–$75,000	10.8%	6.6%	2.0%	3.4%	2.6%	1.7%	0.8%	3.9%
Above $75,000	10.9%	8.0%	2.3%	3.3%	2.1%	1.8%	1.0%	3.9%
Data Missing	8.3%	16.7%	4.5%	0.0%	0.0%	0.0%	1.3%	4.0%
Average	**10.9%**	**7.1%**	**2.6%**	**4.7%**	**3.5%**	**1.8%**	**1.2%**	**4.5%**

Contributing Factors

As noted above, HUD-provided indices of opportunity do not demonstrate the existence of any disparities in opportunity by protected class in areas under the jurisdiction of the Wyoming Fair Housing Team. Nor do additional economic indices included in this study. However, those additional indices suggest that the state has been under increasing economic strain over the last year, and that strain has the potential to exacerbate current disparities in the degree of housing need by race and ethnicity. Those discrepancies will be addressed in the following section. In addition, analysis of home lending data provided by HMDA reveal disparate outcomes in home purchase loans and loan applications by race and ethnicity.

- Disparities in access to financial services, particularly owner-occupied home purchase loans, contribute to disparities in access to opportunity for racial/ethnic minority residents.

E: Disproportionate Housing Needs

Analysis

The following narrative addresses those housing needs for each of the three entitlement areas profiled in the study.

The City of Casper

Around 23.7 percent of Casper households faced some type of housing need in 2008-2012, as shown in Table IV.56 below. Black households were considerably less likely than the average household to face one of the four housing problems described above. By contrast, over half of Asian/Pacific Islander households experienced one or more housing problem, along with 42 percent of those whose head of household identified his or her race as "other."

Table IV.56
Housing Problems by Race, Ethnicity, and Family Size
The City of Casper
2008-2012 CHAS Data

Households with Housing Problems	City of Casper		
Households experiencing any of 4 housing problems*	**# with problems**	**# households**	**% with problems**
Race/Ethnicity			
White, Non-Hispanic	4,810	20,815	23.1
Black, Non-Hispanic	25	190	13.2
Hispanic	370	1,280	28.9
Asian or Pacific Islander, Non-Hispanic	75	145	51.7
Native American, Non-Hispanic	45	170	26.5
Other, Non-Hispanic	94	224	42.0
Total	5,419	22,824	23.7
Household Type and Size			
Family households, <5 people	2,110	10,515	20.1
Family households, 5+ people	250	1,335	18.7
Non-family households	1,730	5,440	31.8
Households experiencing any of 4 Severe Housing Problems	**# with severe problems**	**# households**	**% with severe problems**
Race/Ethnicity			
White, Non-Hispanic	1,770	20,800	8.5
Black, Non-Hispanic	25	190	13.2
Hispanic	125	1,269	9.9
Asian or Pacific Islander, Non-Hispanic	30	145	20.7
Native American, Non-Hispanic	0	170	0.0
Other, Non-Hispanic	90	225	40.0
Total	**2,040**	**22,799**	**8.9**

While large families were more likely to experience a housing need than any other households in the state's non-entitlement areas, these households were the least likely to experience housing need. Small families were slightly more likely than large families to face a housing problem in Casper.

White Casper residents were less likely to face a severe housing problem than any other group, with the exception of Native-American households, none of which experienced a severe

housing problem. By contrast, forty percent of households whose head identified with an "other" race experienced severe housing problems in 2008-2012.

Table IV.57, below, shows the number of households occupying units of various sizes in each publicly supported housing program category type in Casper, as well as the number of households with children for each program type. As shown, most households with children live in Public Housing, with nearly three-quarter of households in this type having children. In Project-Based Section 8 housing, over 45 percent of households live in 0-1 bedroom units, with another 35.9 percent living in 2 bedroom units. The highest percent of households living in the largest units, those with three or more bedrooms, can be found in Public Housing projects.

Table IV.57
Units in Public Housing by Number of Bedrooms and Family Status
The City of Casper
2017 HUD Online Mapping Tool

	HH in 0-1 Bedroom Units		HH in 2 Bedroom Units		HH in 3+ Bedroom Units		Households with Children	
Housing Type	Units	Percent	Units	Percent	Units	Percent	Units	Percent
Public Housing	9	13.0%	22	31.9%	37	53.6%	51	73.9%
Project-Based Section 8	217	45.6%	171	35.9%	21	4.4%	152	31.9%
Other Multifamily	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a
HCV Program	203	45.9%	175	39.6%	43	9.7%	79	17.9%

Note 1: Data Sources: APSH
Note 2: Refer to the Data Documentation for details (www.hudexchange.info).

THE CITY OF CHEYENNE

As shown in Table IV.58 on the following page, 26.2 percent of all Cheyenne households were experiencing one or more housing problems in 2008-2012. White, non-Hispanic households were less likely to experience housing problems than any other racial or ethnic group. By contrast, more than 70 percent of Native-American households experienced at least one of the four housing problems, along with roughly 40 percent of Asian/Pacific Islander and black households.

Table IV.58
Housing Problems by Race, Ethnicity, and Family Size
The City of Cheyenne
2008-2012 CHAS Data

Households with Housing Problems	City of Cheyenne		
Households experiencing any of 4 housing problems*	**# with problems**	**# households**	**% with problems**
Race/Ethnicity			
White, Non-Hispanic	5,000	20,360	24.6
Black, Non-Hispanic	255	645	39.5
Hispanic	880	2,960	29.7
Asian or Pacific Islander, Non-Hispanic	70	170	41.2
Native American, Non-Hispanic	150	203	73.9
Other, Non-Hispanic	99	284	34.9
Total	6,454	24,622	26.2
Household Type and Size			
Family households, <5 people	2,540	10,695	23.7
Family households, 5+ people	395	1,275	31.0
Non-family households	2,010	6,300	31.9
Households experiencing any of 4 Severe Housing Problems	**# with severe problems**	**# households**	**% with severe problems**
Race/Ethnicity			
White, Non-Hispanic	2,300	20,360	11.3
Black, Non-Hispanic	140	645	21.7
Hispanic	335	2,970	11.3
Asian or Pacific Islander, Non-Hispanic	0	170	0.0
Native American, Non-Hispanic	120	204	58.8
Other, Non-Hispanic	35	280	12.5
Total	**2,930**	**24,629**	**11.9**

Small-family households in Cheyenne were less likely to face housing problems than larger families, or non-family households. Around 23.7 percent of small families experienced a housing problem, compared to 31 percent of families with five members or more. Around 32 percent of non-family households experienced at least one housing problem.

With the exception of Asian/Pacific Islander households, none of which faced any severe housing problem in 2008-2012, white, Hispanic, and "other" households were the least likely to face severe housing problems in the City of Cheyenne. The percentages of households with severe housing problems among these groups were close to the overall average of 11.9 percent. By contrast, 58.8 percent of Native American households faced at least one severe housing problem in 2008-2012, along with 21.7 percent of black households.

Table IV.59, below, shows the number of households occupying units of various sizes in each publicly supported housing program category type in Cheyenne, as well as the number of households with children for each program type. As shown, most households with children live in Public Housing, with nearly 43 percent of households in this type having children. In Project-Based Section 8 housing, just over 43 percent of households live in 0-1 bedroom units, with another 32 percent living in 2 bedroom units. The highest percent of households living in the largest units, those with three or more bedrooms, can be found in Public Housing projects.

Table IV.59
Units in Public Housing by Number of Bedrooms and Family Status
The City of Cheyenne
2017 HUD Online Mapping Tool

	HH in 0-1 Bedroom Units		HH in 2 Bedroom Units		HH in 3+ Bedroom Units		Households with Children	
Housing Type	Units	Percent	Units	Percent	Units	Percent	Units	Percent
Public Housing	166	50.0%	9	2.7%	156	47.0%	142	42.8%
Project-Based Section 8	93	43.3%	69	32.1%	49	22.8%	86	40.0%
Other Multifamily	33	68.8%	0	0.0%	0	0.0%	0	0.0%
HCV Program	283	32.6%	348	40.1%	214	24.6%	283	32.6%

Note 1: Data Sources: APSH
Note 2: Refer to the Data Documentation for details (www.hudexchange.info).

The State of Wyoming

The incidence of housing problems in the State of Wyoming is presented in Table IV.60 below. As shown, around 55,400 households in the state were experiencing housing problems in 2008-2012, or one quarter of the state's households. White, non-Hispanic householders were less likely than any other group to experience one of the four housing problems described above. By contrast, more than 40 percent of black, non-Hispanic households were experiencing a housing problem in 2008-2012, along with 36.3 percent of Hispanic households, 36.6 percent of Asian or Pacific Islander households, and 37.5 percent of Native-American, non-Hispanic households. All of these groups experienced housing needs at a significantly higher rate than the average household in the state.

Table IV.60
Housing Problems by Race, Ethnicity, and Family Size
The State of Wyoming
2008-2012 CHAS Data

Households with Housing Problems	**The State of Wyoming**		
Households experiencing any of 4 housing problems*	**# with problems**	**# households**	**% with problems**
Race/Ethnicity			
White, Non-Hispanic	47,125	198,370	23.8
Black, Non-Hispanic	615	1,535	40.1
Hispanic	5,215	14,385	36.3
Asian or Pacific Islander, Non-Hispanic	414	1,132	36.6
Native American, Non-Hispanic	1,120	2,985	37.5
Other, Non-Hispanic	890	3,065	29.0
Total	55,379	221,472	25.0
Household Type and Size			
Family households, <5 people	20,000	98,945	20.2
Family households, 5+ people	5,880	16,455	35.7
Non-family households	16,995	50,950	33.4
Households experiencing any of 4 Severe Housing Problems	**# with severe problems**	**# households**	**% with severe problems**
Race/Ethnicity			
White, Non-Hispanic	22,245	198,375	11.2
Black, Non-Hispanic	410	1,550	26.5
Hispanic	3,005	14,390	20.9
Asian or Pacific Islander, Non-Hispanic	223	1,126	19.8
Native American, Non-Hispanic	815	2,985	27.3
Other, Non-Hispanic	534	3,069	17.4
Total	**27,232**	**221,495**	**12.3**

Large-family households; i.e., those with 5 or more members; were more likely to experience at least one housing problem than non-family or small-family households. Around 35.7 percent of large families experienced a housing need in 2008-2012, compared to a 33.4 percent of non-family households and 20.2 percent of family households with fewer than five members.

Approximately 27,200 households throughout the state were experiencing a severe housing need, with Black and Native-American householders more likely than any other group to face any one of the four severe housing problems (e.g., severe cost-burdens, severe-overcrowding, etc.). Around 12.3 percent of all households in the state experienced one or more severe housing problems in 2008-2012.

Roughly 15 to 30 percent of households were experiencing housing problems in most Census tracts throughout the state, as shown below in Map IV.37. Census tracts with higher rates of housing problems tended to be located in and around the state's more populated areas, including Census tracts in and around Cheyenne, Casper, and Laramie. In those areas, the incidence of housing problems ranged from 30.1 to 45 percent.

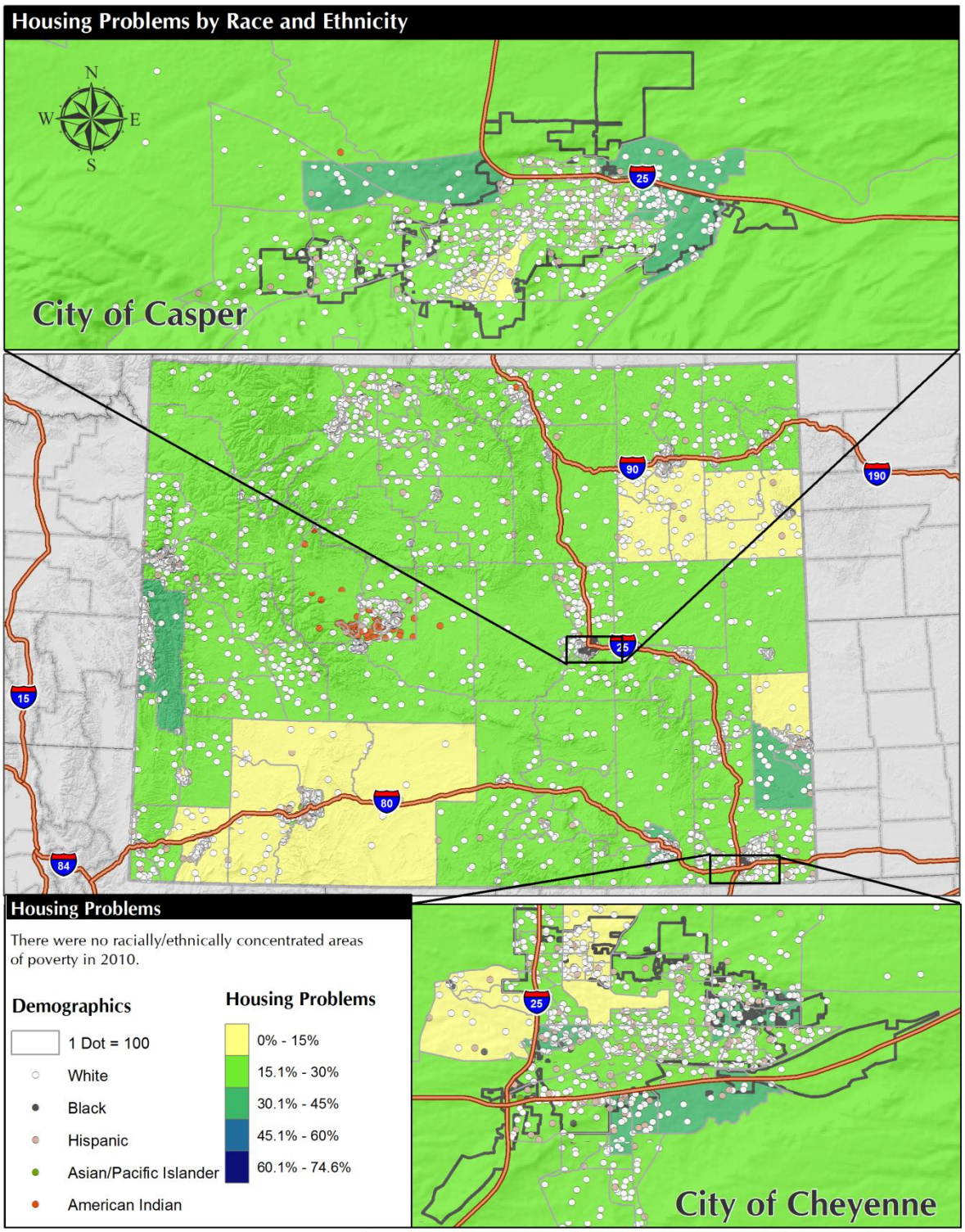
Additional Information

Map IV.37 and Map IV.38 on the following pages show percentage of households per Census tract with at least 1 HUD-defined housing problem, along with race/ethnicity and national origin (respectively). As stated above, there are no R/ECAPs in the state or any areas with particularly high levels of segregation.

Contributing Factors of Disproportionate Housing Needs

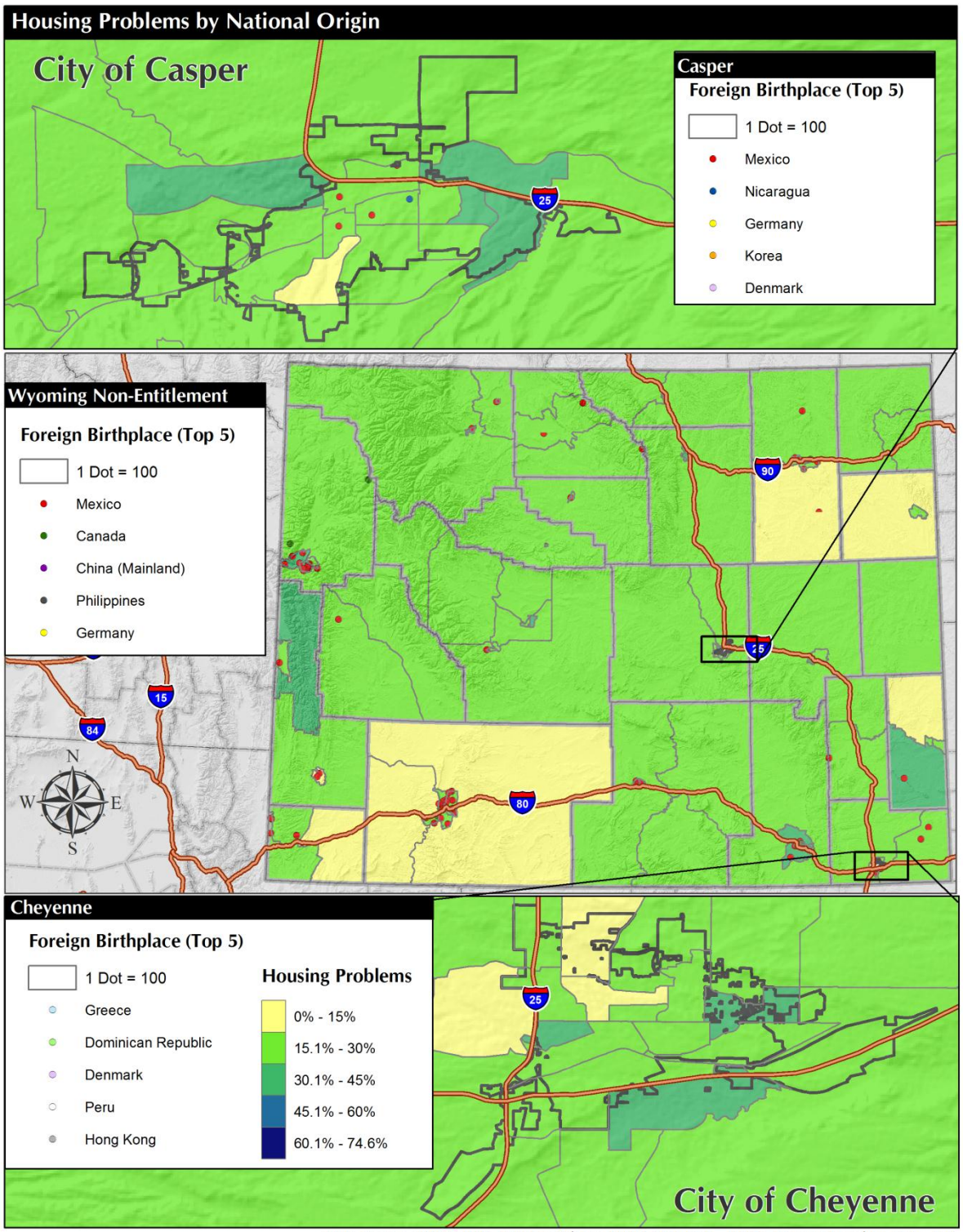
- There is limited availability of affordable units in a range of sizes.
- Economic forces, including rising unemployment, declining oil and gas production, and historical growth in rental costs, contribute to disproportionate housing needs.

Map IV.37
Housing Problems and Race/Ethnicity
The State of Wyoming and Entitlement Areas
2015 AFFH Raw Data



Data Source: 2015 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline Data, Esri

Map IV.38
Housing Problems and National Origin
The State of Wyoming and Entitlement Areas
2015 AFFH Raw Data



Data Source: 2015 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline Data, Esri

F. Publicly Supported Housing

Analysis

Most of the households living in Publicly Supported Housing throughout the state are white,[31] according to the most recent AFFH data available from HUD. Nearly 97 percent of households in "other multifamily" units were white, compared to 87.2 percent of Project-Based Section 8 households, 80.1 percent of Public Housing units, and 79.6 percent of Housing Choice Voucher-assisted units. Black households were more likely to live in voucher-assisted units than in other types of supported housing, and the same was true of Hispanic residents. However, Hispanic households accounted for a larger share of Public Housing units than any other supported housing type.

A similar pattern arises in the state's non-entitlement areas, though White households tended to occupy even larger percentages of supported housing units than in the state as a whole. Black households remained more likely to live in voucher-assisted units than in other types of supported housing, while Hispanic households were more likely to live in Project-Based Section 8 housing in the state's non-entitlement areas.

There were no households living in "other multifamily" units in Casper as of December 2015, according to data provided by HUD. While just over 92 percent of Housing Choice Voucher-assisted units were occupied by White households, white households were more likely to be living in Project-Based Section 8 housing. The same was true of Black and Hispanic households in the city.

White households in Cheyenne accounted for nearly all households living in "other multifamily" units, though these households were considerably more likely to be living in Housing Choice Voucher-assisted units than supported housing of any other type. Black household were also more likely to be living in voucher-assisted units, as were Hispanic households.

The City of Casper

In the City of Casper, 82.3 percent of households living in Public Housing units were White, 4.8 percent were Black, 9.7 percent were Hispanic, and 1.6 percent were Asian/Pacific Islander, as shown in Table IV.61 on the following page. The population of the city as a whole was 88.4 percent white, 0.9 percent black, 7.4 percent Hispanic, and 0.8 percent Asian/Pacific Islander. By this measure, white residents were slightly underrepresented among Public Housing residents, while black, Hispanic, and Asian/Pacific Islander residents were slightly overrepresented. However, the percentage of Black, Hispanic, and Asian/Pacific Islander households living in Public Housing exceeded each group's share of the total population of Casper by less than 4 percentage points.

[31] The race and ethnicity of a household is designated according to the race or ethnicity of the head of household.

Table IV.61
Population in Public Housing by Race and Ethnicity
The City of Casper
2015 HUD AFFH Data, 2010 Census Data

	Race/Ethnicity							
Casper Assisted Housing	**White**		**Black**		**Hispanic**		**Asian or Pacific Islander**	
Housing Type	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Public Housing	51	82.3	3	4.8	6	9.7	1	1.6
Project-Based Section 8	368	85.2	17	3.9	38	8.8	0	0.0
Other Multifamily	0	0.0	0	0.0	0	0.0	0	0.0
HCV Program	314	92.6	8	2.4	12	3.5	1	0.3
0-30% of AMI	1,805	85.1	20	0.9	135	6.4	0	0.0
0-50% of AMI	3,710	81.5	70	1.5	275	6.0	20	0.4
0-80% of AMI	8,150	86.8	90	1.0	560	6.0	60	0.6
The City of Casper (2010 Census)	48,886	88.4	523	0.9	4,070	7.4	433	0.8

Project-based Section 8 households in Casper were fairly representative of the population as a whole, in terms of race and ethnicity: 85.2 percent of PBS8 households were white, compared to 88.4 percent of residents in the city population; 3.9 percent were black, compared to 0.9 percent of city residents; and 8.8 percent were Hispanic, compared to 7.4 percent of city residents. No Asian/Pacific Islander households were living in PBS8 housing: this group accounted for 0.8 percent of the city population.

There were no "other multifamily" units in Casper, according to the HUD-provided data.

Households receiving assistance through Housing Choice Vouchers were 92.6 percent white, 2.4 percent black, 3.5 percent Hispanic, and 0.3 percent Asian/Pacific Islander. White households were slightly overrepresented among voucher-holders when compared to the white population overall, as were black households. At the same time, Hispanic households accounted for a share of voucher-assisted households that was roughly 4 percentage points below the Hispanic population's share of the overall population.

Table IV.62, below, shows demographics and family status for developments of various category types in Casper. As seen there, the St. Anthony Manor development has the highest concentration of White residents (87 percent), while Eastward Court has the most Black residents (17 percent). Hispanics were most represented in Village Gardens (14 percent) and, at 9 percent, Windy City Enterprises contains the largest proportion of Asian residents. The latter three developments mentioned here are an over-representation of their respective racial/ethnic groups when compared to the overall demographics of the City of Casper (see Table IV.1 on page 36).

Table IV.62
Public Housing Demographics by Category Type
City of Casper
2017 HUD Online Mapping Tool

Category Type	Development Name	White	Black	Hispanic	Asian	HH with Children
Public Housing	Casper	84%	6%	6%	1%	74%
Project-Based Section 8	Village Gardens	81%	6%	14%	n/a	83%
	Skyline Towers Inc.	n/a	n/a	n/a	n/a	n/a
	Eastward Court	70%	17%	13%	n/a	73%
	Spring Hill Apartments	84%	5%	7%	n/a	59%
	St. Anthony Manor	87%	2%	5%	2%	n/a
	Gail Gardens	85%	1%	7%	n/a	6%
	Windy City Enterprises	82%	n/a	0%	9%	n/a
	Platte View Apartments	72%	11%	11%	n/a	63%
Other HUD Multifamily	Hanway Project	n/a	n/a	n/a	n/a	n/a
	Wisconsin Street Project	n/a	n/a	n/a	n/a	n/a

THE CITY OF CHEYENNE

In Cheyenne, 74.2 percent of households living in Public Housing units were white, 7 percent were black, 17 percent were Hispanic, and 0.9 percent where Asian/Pacific Islander. As shown in Table IV.63 below, White and Asian/Pacific households were slightly underrepresented among those living in Public Housing units compared to the percentage of residents from each group living in the overall population: 78.8 and 1.2 percent, respectively. At the same time, black and Hispanic households were slightly overrepresented, as compared to the overall population, 2.6 percent of which was black and 14.8 percent of which was Hispanic. However, no group represented a percentage of households in Public Housing that exceeded that group's share of the total population by more than 5 percentage points.

Table IV.63
Population in Public Housing by Race and Ethnicity
The City of Cheyenne
2015 HUD AFFH Data, 2010 Census Data

	Race/Ethnicity							
Cheyenne Assisted Housing	**White**		**Black**		**Hispanic**		**Asian or Pacific Islander**	
Housing Type	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Public Housing	244	74.2	23	7.0	56	17.0	3	0.9
Project-Based Section 8	164	78.1	9	4.3	29	13.8	1	0.5
Other Multifamily	13	92.9	0	0.0	1	7.1	0	0.0
HCV Program	581	66.0	121	13.8	159	18.1	5	0.6
0-30% of AMI	1,945	76.4	160	6.3	289	11.4	10	0.4
0-50% of AMI	3,645	65.3	210	3.8	929	16.6	90	1.6
0-80% of AMI	7,645	72.1	399	3.8	1,679	15.8	105	1.0
The City of Cheyenne (2010 Census)	36,307	78.8	1,185	2.6	6,801	14.8	539	1.2

Project-based Section 8 households in Cheyenne proved to represent a fairly representative cross-section of the city's population: 78.1 percent of PBS8 households in the city were white, 4.3 percent were black, 13.8 were Hispanic, and 0.5 percent were Asian/Pacific Islander. By

comparison, the city's population as a whole was 78.8 percent white, 2.6 percent black, 14.8 percent Hispanic, and 1.2 percent Asian/Pacific Islander.

In keeping with state-level trends in the composition of households living in "other multifamily units", the 13 "other multifamily" units located in Casper were disproportionately white. While these white households accounted for 92.9 percent of those living in "other multifamily" units in the city, white residents accounted for 78.8 percent of the city population in 2010, as noted above.

White residents were substantially underrepresented among Housing Choice Voucher-holders in the City of Cheyenne, while black residents were overrepresented: Though white residents represented 78.8 percent of the city population, white households only accounted for 66 percent of those receiving vouchers. Though black residents made up 2.6 percent of the city population, 13.8 percent of vouchers went to black households. Hispanic households were also slightly overrepresented among voucher-assisted households, accounting for 18.1 percent of those households; Hispanic residents accounted for 14.8 percent of the population in 2010.

Table IV.64, below, shows demographics and family status for developments of various category types in Cheyenne. As seen there, the Cheyenne Handicapped Services development has the highest concentration of White residents (100 percent), while Cheyenne Station Apartments have the highest concentration of Black residents (11 percent). Hispanics were most represented in Cheyenne Station Apartments (27 percent) and, at only 6 percent, Cheyenne Indian Hills Manor contains the largest proportion of Asian residents. All four developments mentioned here are an over-representation of their respective racial/ethnic groups when compared to the overall demographics of the City of Cheyenne (see Table IV.7 on page 39).

Table IV.64
Public Housing Demographics by Category Type
City of Casper
2017 HUD Online Mapping Tool

Category Type	Development Name	White	Black	Hispanic	Asian	HH with Children
Public Housing	Cheyenne	72%	8%	18%	1%	43%
Project-Based Section 8	Cheyenne Station Apartments	56%	11%	27%	1%	72%
	Holy Trinity Manor	86%	n/a	14%	n/a	n/a
	Cheyenne Indian Hills Manor	86%	4%	4%	6%	2%
	Cheyenne North Apartments	68%	6%	17%	2%	66%
	Cheyenne Handicapped Services	100%	n/a	0%	n/a	n/a
Other HUD Multifamily	Heritage Court	82%	3%	12%	n/a	n/a
	Peak Wellness Center	n/a	n/a	n/a	n/a	n/a
	Greenview Apartments, Inc.	n/a	n/a	n/a	n/a	n/a
	Cheyenne H.A.V.En.	n/a	n/a	n/a	n/a	n/a

THE STATE OF WYOMING

Households throughout the state that were supported by the Public Housing program were 80.1 percent white, 4.7 percent black, 13 percent Hispanic, and 0.9 percent Asian/Pacific Islander, as shown in Table IV.65 below. By comparison, white residents represented 85.9 percent of the total population of the state, while black residents represented 0.8 percent, Hispanic residents 8.9 percent, and Asian/Pacific Islander 0.8 percent. By this measure, White residents are underrepresented among Public Housing units, while Black and Hispanic residents are overrepresented. However, neither group represents a share of Public Housing units that was more than five percentage points higher than that group's share of the population as a whole.

Table IV.65
Population in Public Housing by Race and Ethnicity
The State of Wyoming
2015 HUD AFFH Data, 2010 Census Data

	Race/Ethnicity							
Wyoming Assisted Units	**White**		**Black**		**Hispanic**		**Asian or Pacific Islander**	
Housing Type	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Public Housing	531	80.1	31	4.7	86	13.0	6	0.9
Project-Based Section 8	1,549	87.2	30	1.7	151	8.5	2	0.2
Other Multifamily	112	96.6	0	0.0	2	1.7	0	0.0
HCV Program	1,783	79.6	158	7.1	238	10.6	9	0.4
0-30% of AMI	20,350	83.9	420	1.7	2,039	8.41	105	0.5
0-50% of AMI	37,725	75.0	600	1.2	4,354	8.66	369	0.7
0-80% of AMI	73,435	81.0	925	1.0	7,224	7.97	557	0.6
The State of Wyoming (2010 Census)	483,874	85.9	4,351	0.8	50,231	8.9	4,644	0.8

Households receiving assistance through Project Based Section 8 (PBS8) subsidies were 87.2 percent White, 1.7 percent black 8.5 percent Hispanic, and 0.9 percent Asian/Pacific Islander. At the household level, the share of each group residing in PBS8 housing was roughly on par with that group's share of the overall population.

There were relatively few households living in "other multifamily" units throughout the state, and white households were substantially overrepresented among those units. Though white residents accounted for 85.9 percent of the state population, nearly 97 percent of households in "other multifamily" units were white. There were no black or Asian/Pacific Islander households living in these units throughout the state, and only two Hispanic households.

"Other multifamily" properties are funded through a variety of sources, including Supportive Housing for the Elderly (Section 202).[32] This fact along with the relatively high proportion of white residents that are aged 65 and older likely contributes to the overrepresentation of white households among those units. Fifteen percent of the white population was aged 65 and older in 2014, according to intercensal estimates from that year, compared to 9.6 percent of Black residents, 6.9 percent of American Indian residents, 8.4 percent of Asian residents, and 8 percent of Asian/Pacific Islander residents.

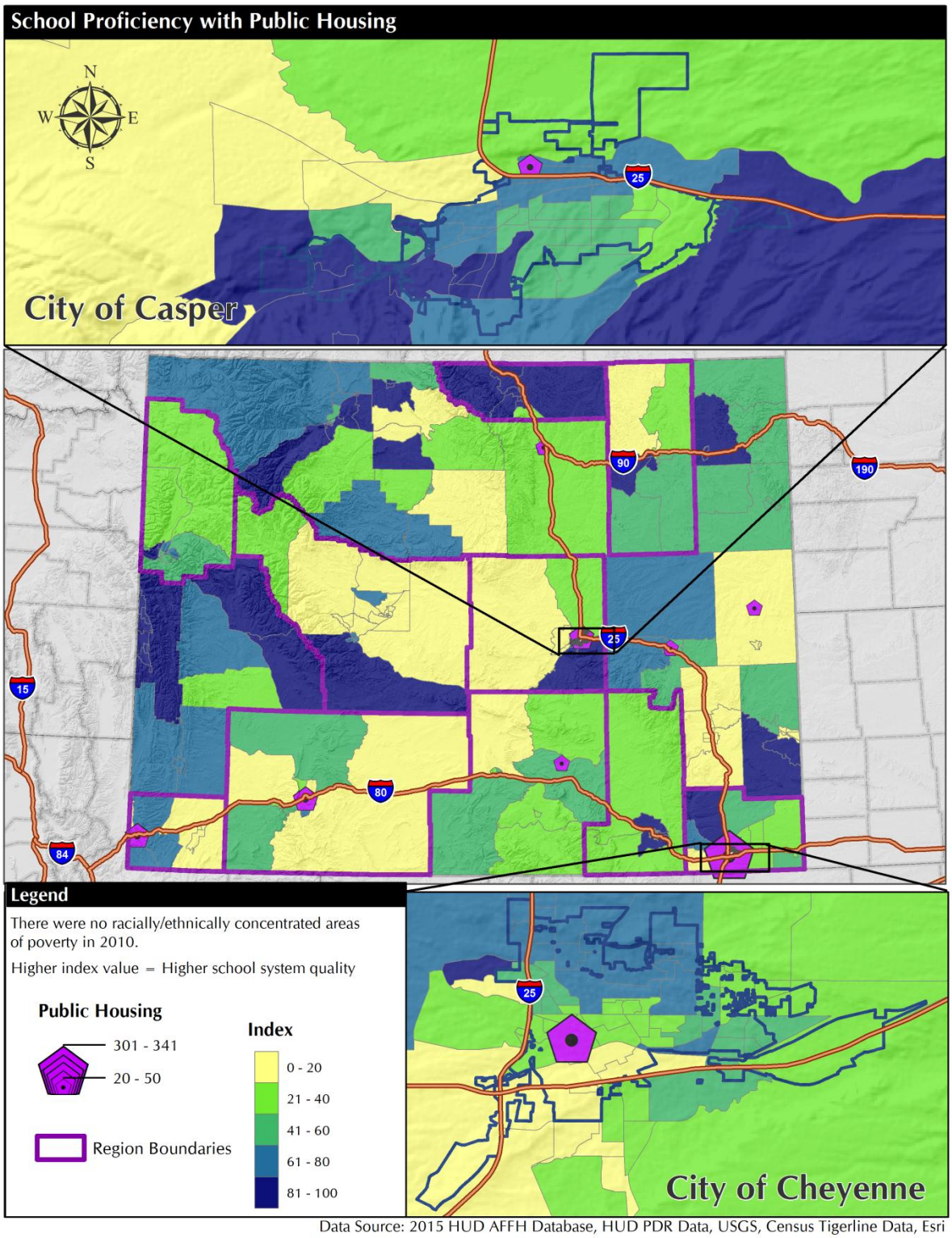
[32] *AFFH Data Documentation*. U.S. Department of Housing and Urban Development. July 2016.

Households supported through Housing Choice Vouchers throughout the state were 79.6 percent white, 7.1 percent black, 10.6 percent Hispanic, and 0.4 percent Asian/Pacific Islander. Compared to the percentage of White residents in the state, White households were somewhat underrepresented among Housing Choice Voucher-holders, while Black households were somewhat overrepresented (7.1 percent of voucher-holders compared to 0.8 percent of the overall population).

The seven maps beginning with Map IV.39 below show access to opportunity by the seven indices identified in Section D of this report. Each opportunity index is overlaid with public housing location in Casper, Cheyenne, and the State of Wyoming. Map IV.39 below shows the School Proficiency Index, and there are public housing locations in Census tracts with the highest level of proficiency. Map IV.40 on page 134 shows the Jobs Proximity Index, and there are several public housing locations in areas of high proximity to employment, such as Cheyenne and near Hanna.

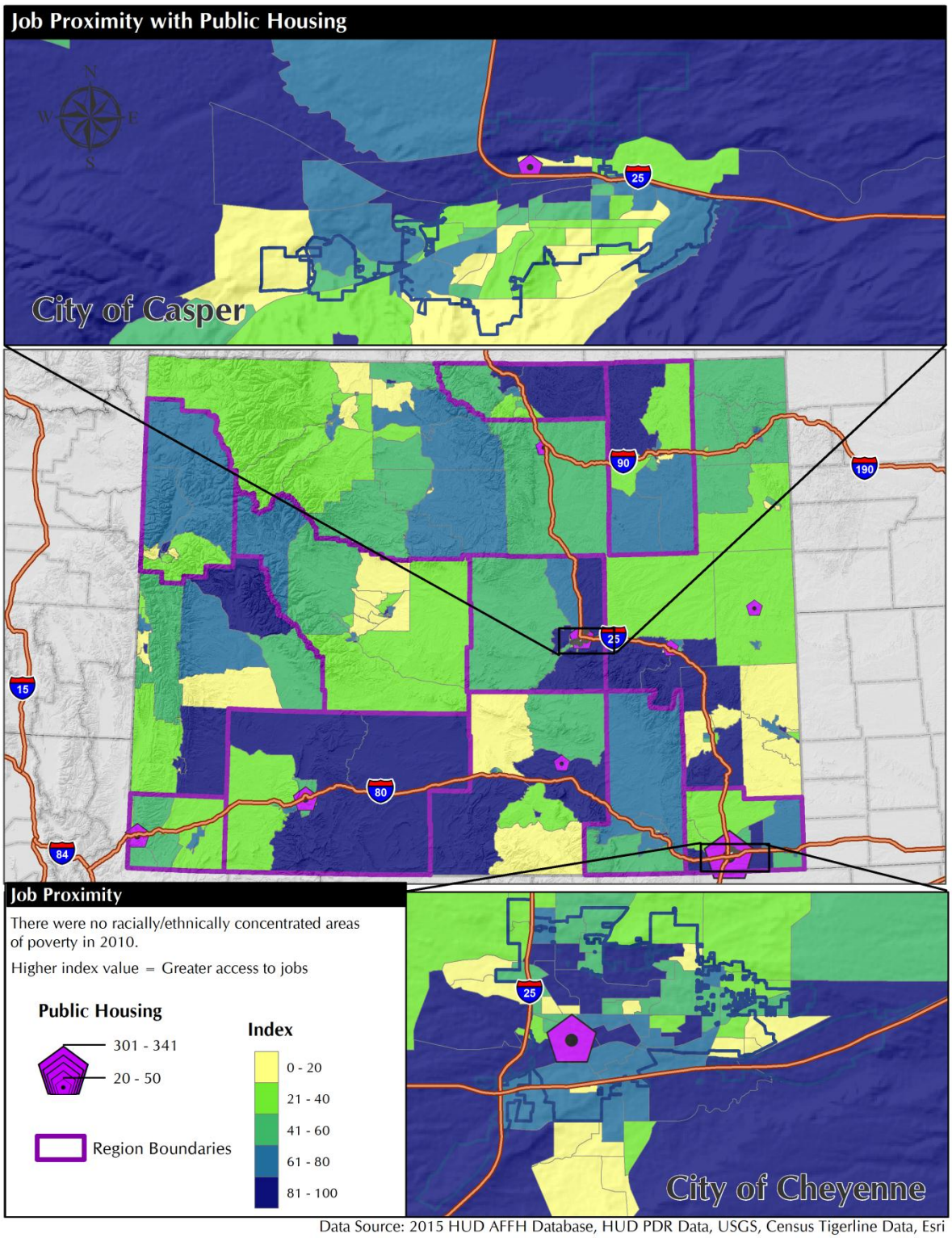
Map IV.41 on page 135 shows labor market engagement, and as seen there, public housing tends to be located in areas of moderate engagement. Map IV.42 on page 136 shows transit trips by Census tract, with public housing being located in a mix of good and bad access to transit. Public housing near Rock Springs appears to be located in the Census tract with the greatest access to transit. Map IV.43 on page 137 shows that public housing in both Casper and Cheyenne is located in areas with low transportation costs. The rest of public housing, especially in the east, is located where transportation costs are much higher. Map IV.44 on page 138 shows that, in general, public housing is located in Census tracts with greater exposure to poverty. Finally, Map IV.45 on page 139 shows the Environmental Health Index, and only in Casper and Cheyenne are there located public housing units that do not have access to the very best environmental quality.

Map IV.39
School Proficiency Index with Public Housing
The State of Wyoming and Entitlement Areas
2015 HUD AFFH Database



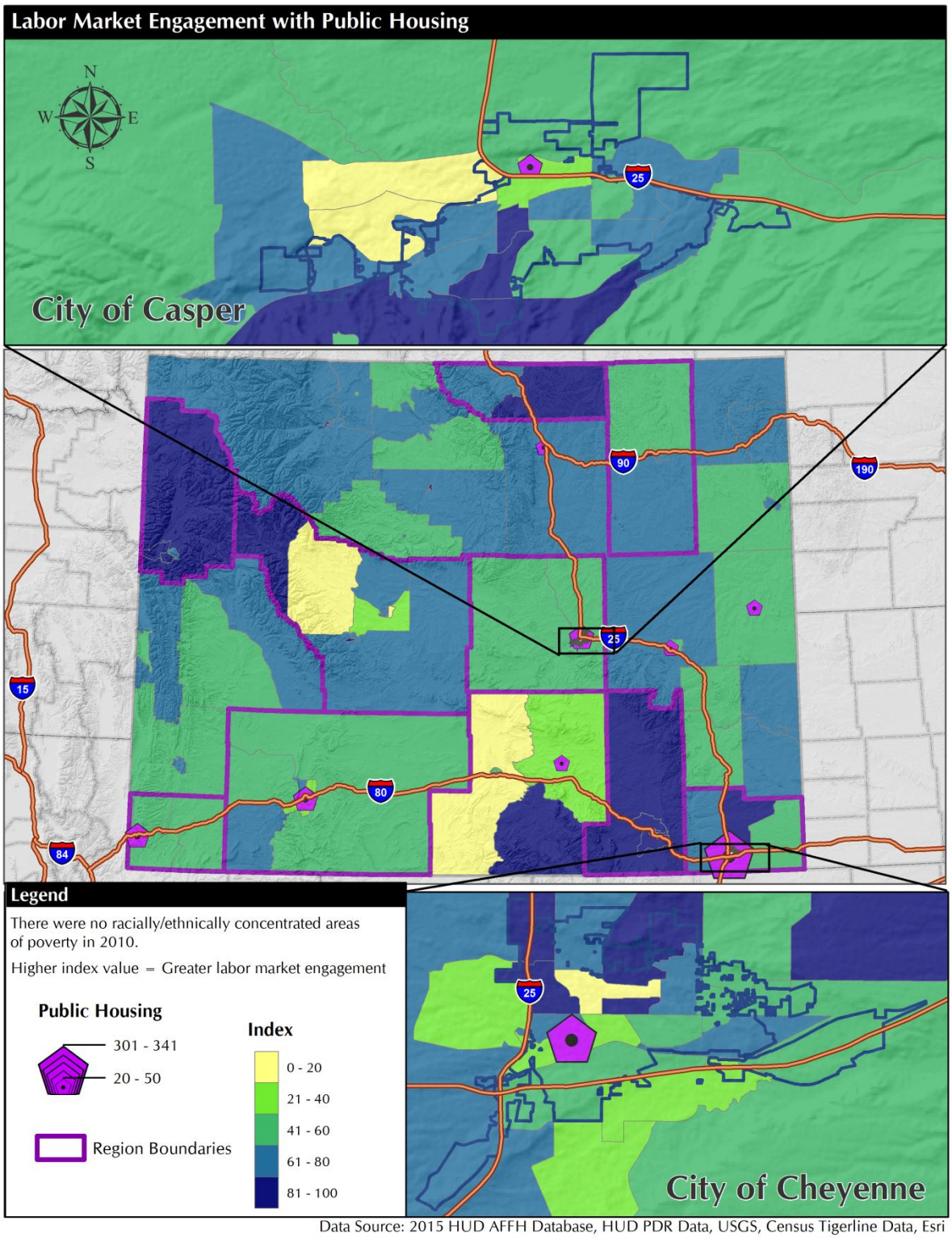
Data Source: 2015 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline Data, Esri

Map IV.40
Jobs Proximity Index with Public Housing
The State of Wyoming and Entitlement Areas
2015 HUD AFFH Database



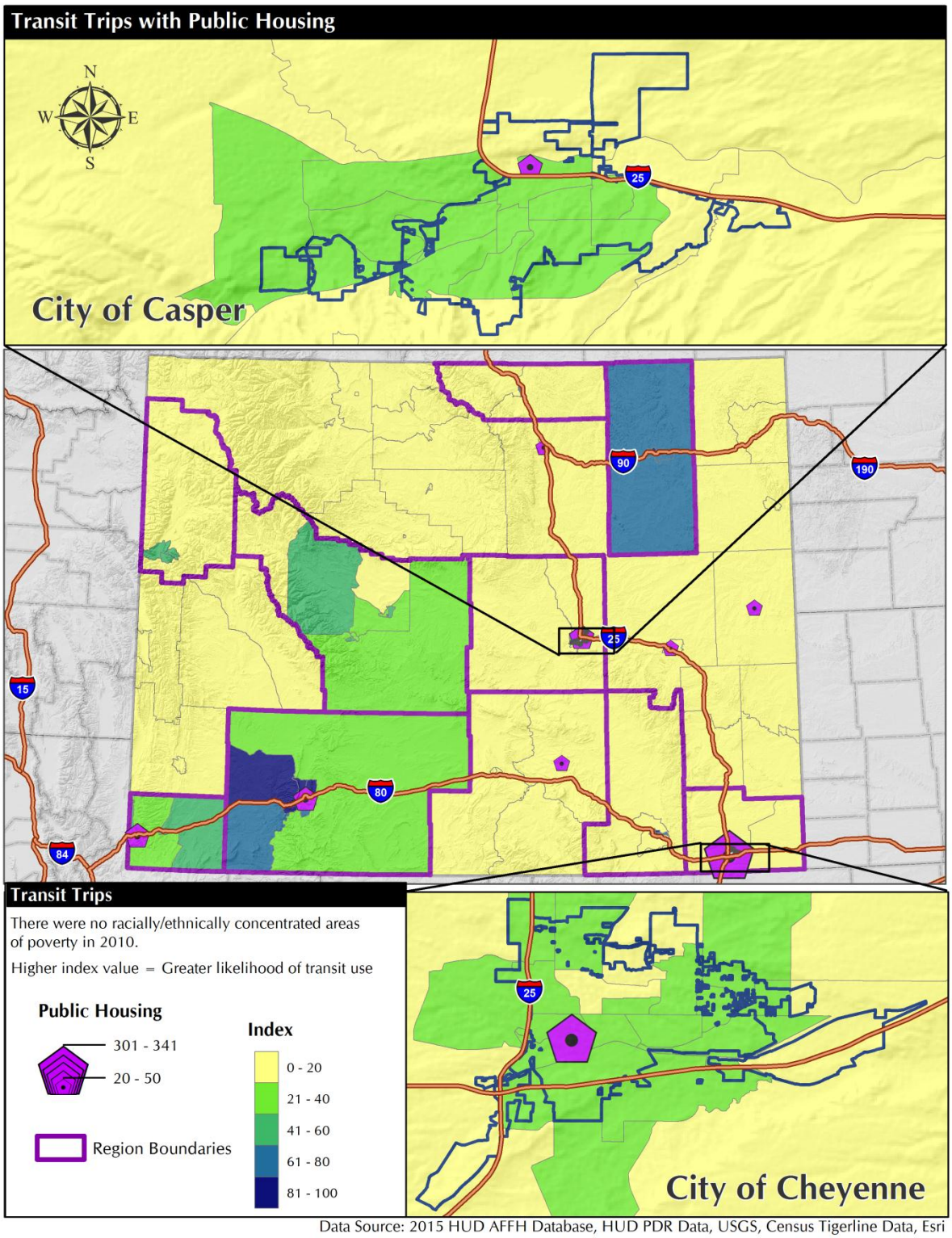
Data Source: 2015 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline Data, Esri

Map IV.41
Labor Market Engagement Index with Public Housing
The State of Wyoming and Entitlement Areas
2015 HUD AFFH Database



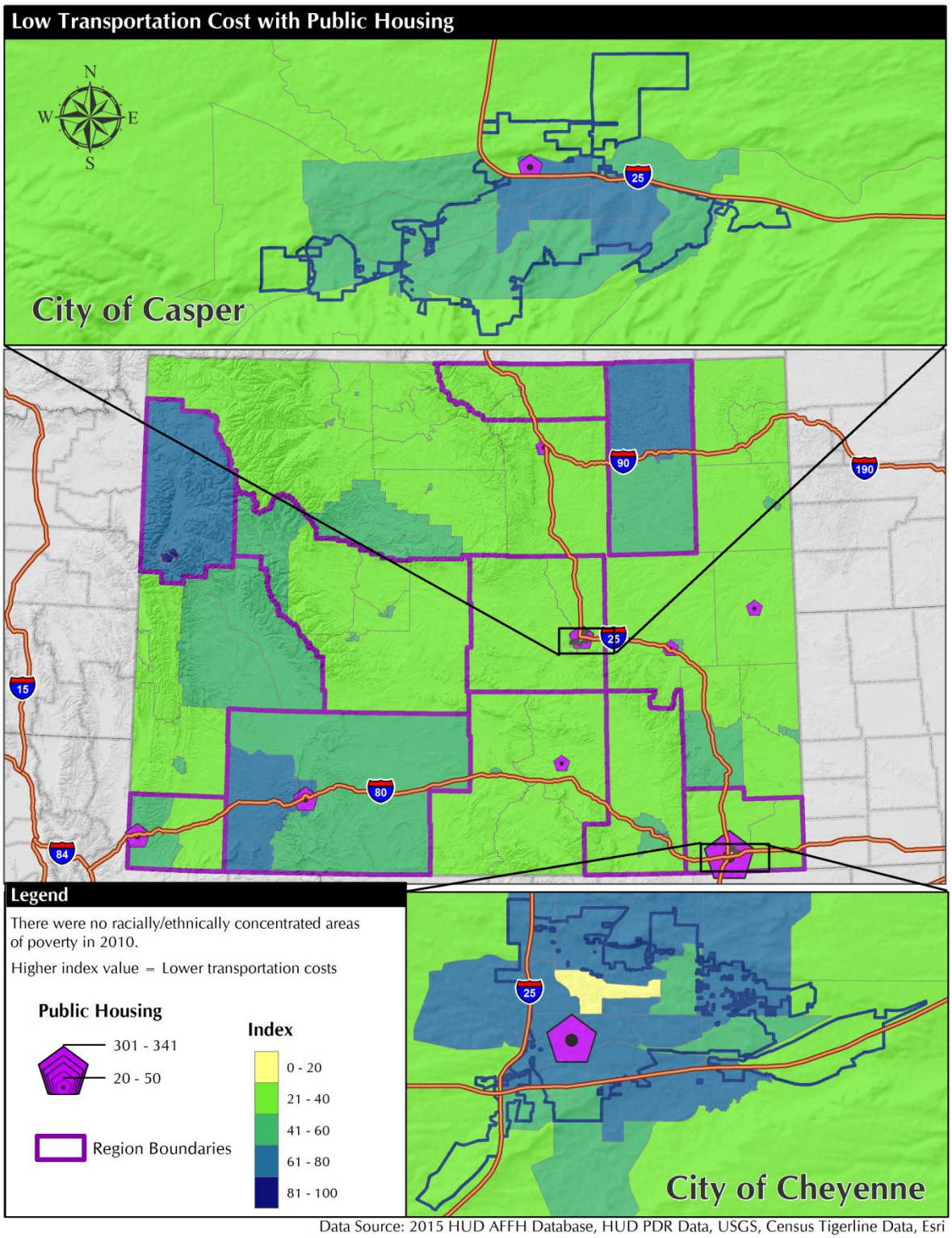
Data Source: 2015 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline Data, Esri

Map IV.42
Transit Trips Index with Public Housing
The State of Wyoming and Entitlement Areas
2015 HUD AFFH Database



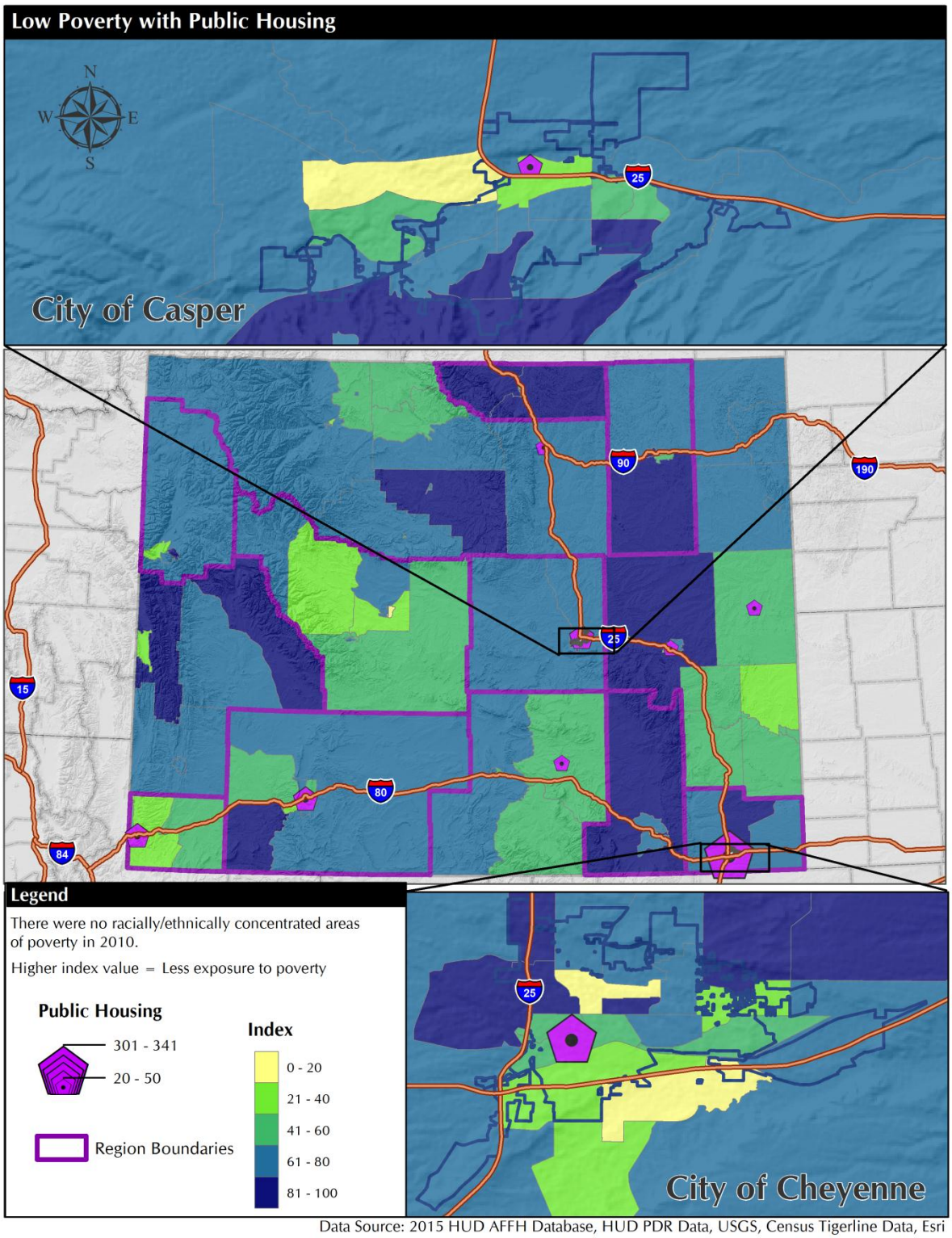
Data Source: 2015 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline Data, Esri

Map IV.43
Low Transportation Cost Index with Public Housing
The State of Wyoming and Entitlement Areas
2015 HUD AFFH Database



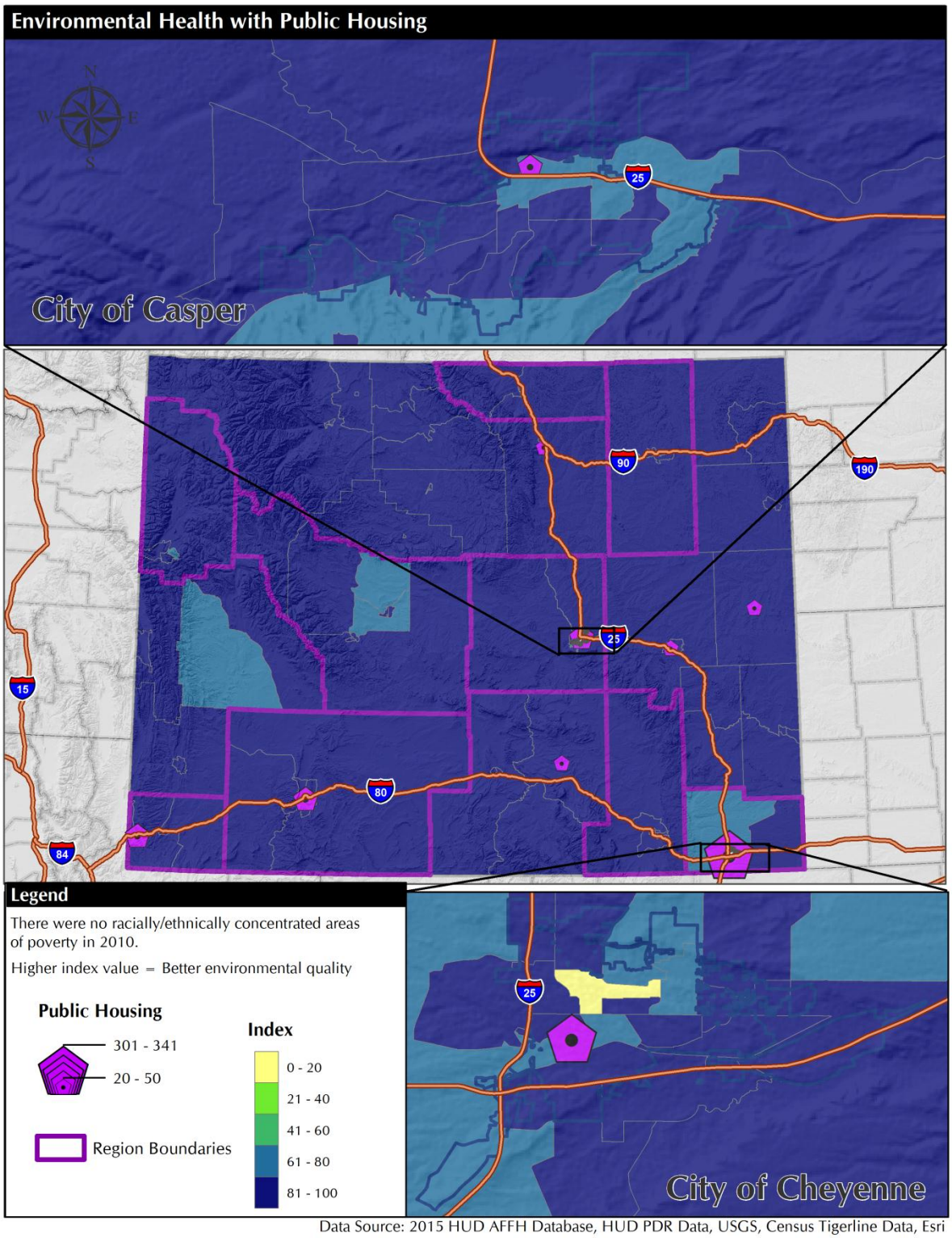
Data Source: 2015 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline Data, Esri

Map IV.44
Low Poverty Index with Public Housing
The State of Wyoming and Entitlement Areas
2015 HUD AFFH Database



Data Source: 2015 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline Data, Esri

Map IV.45
Healthy Neighborhoods Index with Public Housing
The State of Wyoming and Entitlement Areas
2015 HUD AFFH Database



Data Source: 2015 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline Data, Esri

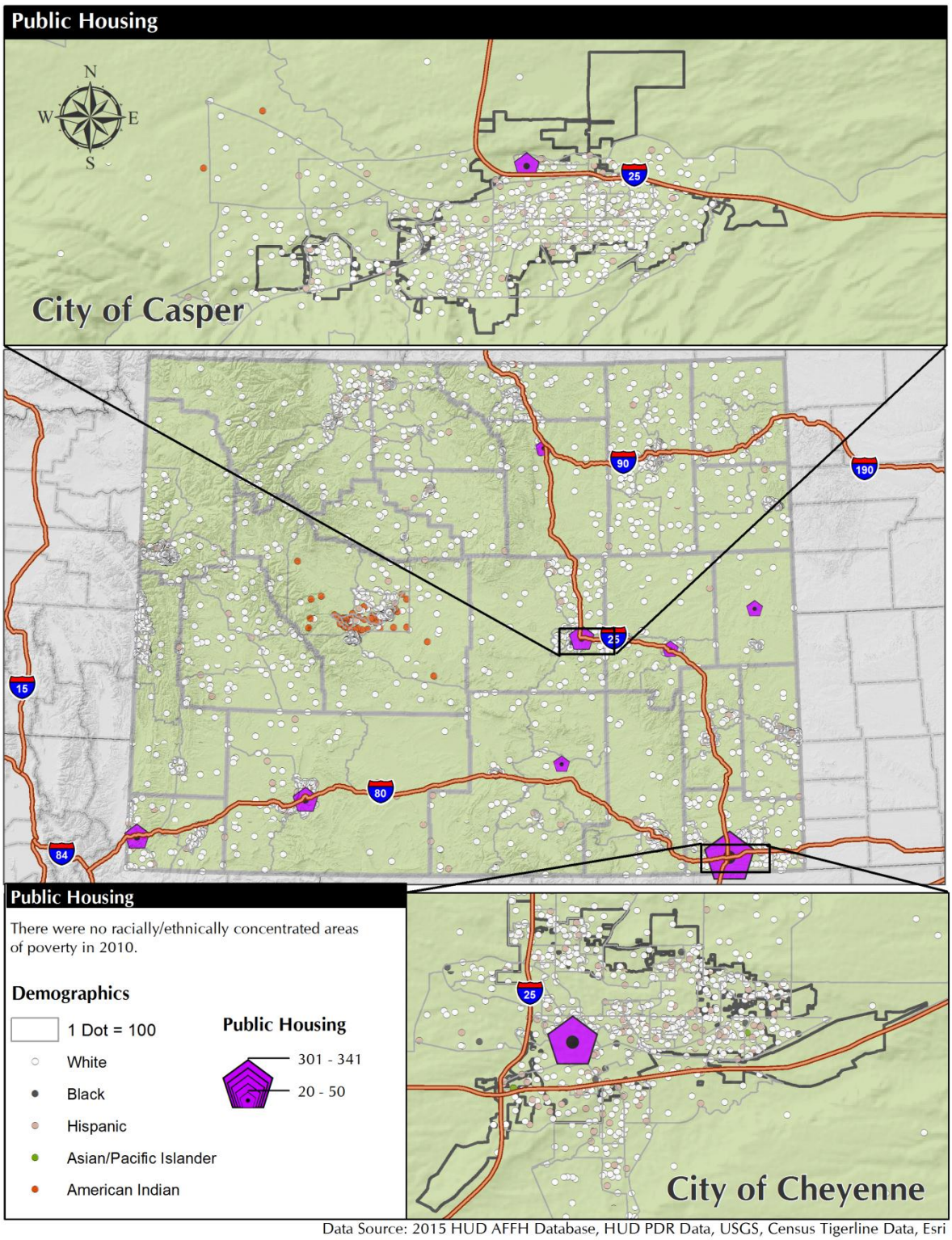
a) Publicly Supported Housing Location and Occupancy

As one might expect, publicly supported housing units of all types tended to be located in more populous areas of the state, especially those served by a public housing agency (PHA) or qualified PHA. There were no units of publicly supported housing located within racially or ethnically concentrated areas of poverty (R/ECAPs), for the reason that there have been no R/ECAPs in the state since at least 1990, which is the earliest date included in this study. The distribution of publicly assisted housing units in the State is presented in Map IV.46 below.

As noted above, there have been no publicly supported housing units of any type located in R/ECAPs, as the state has no areas qualifying as R/ECAPs.

There is no variation in the composition of publicly-supported housing occupants depending on whether they are located within or outside of R/ECAPs, as there are no R/ECAPs in the state.

Map IV.46
Public Housing
The State of Wyoming and Entitlement Areas
2015 HUD AFFH Database



Data Source: 2015 HUD AFFH Database, HUD PDR Data, USGS, Census Tigerline Data, Esri

b) Low Income Housing Tax Credits

According to the Initial Allocation Criteria included in the Wyoming Community Development Authority's 2016 Affordable Housing Allocation Plan, "[a] proposal will receive up to 5 points if the project being developed is located in a Qualified Census Tract and contributes to a concerted Community Revitalization Plan. Until "Community Revitalization Plan" (CRP) has been formally defined by HUD or the IRS, a Developer may provide a letter from the local jurisdiction, or the state, that the project sits in a CRP area."

As noted in the 2016 QAP, "[project] location is an integral part of the scoring process..." Projects are awarded additional points based on the following criteria:

1) APPROPRIATE LOCATION - A project may receive up to 35 points for being within a proximity of 1 ½ miles (½ mile for elderly) of appropriate services needed by the residents occupying the units (must list services and distance from project to be eligible to receive points).
2) CONCENTRATION OF LOW-INCOME HOUSING – A project may receive up to 15 points if it is demonstrated that the project will not contribute to a concentration of Low-Income housing.

By contrast, proposals may be docked up to 200 points if prospective developments will be located in an "inappropriate locations", including "locations in 100-year flood areas, noise areas, areas of concentrated low-income, near hazardous site areas (above ground storage tanks of hazardous materials), airport clear zones, those sites listed in the EPA CERCLIS data base, other hazards outlined by HUD in their Environmental Review Requirements and other items of concern such as topography of the site or surrounding area and other issues that may require an abnormal amount of land to be purchased or an unusual amount of site work known or discovered by WCDA, etc."

The qualified allocation plan awards up to 35 points to projects that will be constructed with support or contributions from local sources. Such support may include any local action or contribution that reduces the cost of development, including donations of land, labor, materials, cash or a waiver of local fees.

Proposals are also awarded 5 points if the prospective development will be located in a community that is actively reducing barriers associated with affordable housing. Examples of steps that communities might take to reduce such barriers include the following:

1) Reducing or waiving fees or real estate tax concessions for Affordable Housing.
2) Within the last year the Jurisdiction has convened or funded comprehensive studies, commissions, or hearings, or has established a formal ongoing process, to review, the rules, regulations, development standards and processes of the jurisdiction to assess their impact on the supply of Affordable Housing.
3) Within the last year the Jurisdiction has initiated regulatory reforms as a result of the above.
4) Jurisdiction has a single consolidated permit application process for housing development that includes building, zoning, engineering, environmental and related permits or "fast track" permitting and approvals for all affordable housing projects.

5) Reduction or waiver of parking or green space requirements for all affordable housing developments.
6) The jurisdiction has funded, directly or through partnerships, comprehensive studies of current and estimated housing needs taking into account the anticipated growth of the region, for existing and future residents, including low-, moderate-, and middle-income families for at least the next five years.
7) Lower cost land development requirements for Affordable Housing developments, i.e. higher density, narrower streets, sidewalks on only one side of the street etc.

All developers applying for funding under the Tax Credit or other programs must submit an Affirmative Fair Housing Marketing Agreement with their application, which explains how the prospective development will be marketed to minorities or hard-to-reach very low-income households.

Proposed projects receive up to 35 points under the QAP for being located within 1.5 miles of appropriate services needed by residents occupying the units (0.5 miles for projects targeting elderly residents). Up to 10 points are also awarded to projects that are appropriate to a need identified in an "independent comprehensive, timely, and professional Market Study."

There are no areas in the state that have been identified as R/ECAPs or areas of segregation, based on HUD's criteria.

Not applicable.

c) Other State Administered Programs Related to Housing and Urban Development

There are no areas in the state that have been identified as R/ECAPs or areas of segregation, based on HUD's criteria.

Additional Information

Based on feedback from local officials and stakeholders during the AI process, the current supply of affordable housing is not sufficient to meet the needs of Wyoming residents.

Potential limitations on the supply of affordable housing that were highlighted during the public input process include resistance to affordable housing/NIMBYism.

Contributing Factors of Publicly Supported Housing Location and Occupancy

- There is limited availability of affordable units in a range of sizes.
- High rental vacancy rates contribute to a shortage of affordable units in many areas by making it more difficult to develop affordable housing in those areas.
- NIMBYism is a concern.
- Resistance to affordable housing.

G: Disability and Access

Population Profile

There were few Census tracts in the state in which the percentage of residents with disabilities differed substantially from the statewide average, though as one might expect, residents with disabilities tend to live in the state's more populated areas. This is true regardless of disability type, as shown in Maps 13 and 14 in Technical Appendix Section A, and the age of the resident with disabilities, as shown in Map 15 in Technical Appendix Section A. There were no areas within the jurisdiction of the Fair Housing Team that displayed more than a low level of segregation in 2010 (as defined by the dissimilarity index), or that qualified as racially/ethnically concentrated areas of poverty in 1990, 2000, or 2010. Accordingly, there were no such areas in which residents with disabilities tended to be concentrated.

The distribution of residents with disabilities is presented in Map V.D.1 on the following page. In this map, residents with disabilities are portrayed as a percentage of the population in a given Census tract.

There was no observed variation in living patterns by type of disability or age of the person with disabilities.

Housing Accessibility

Based on the input of participants in PHA presentations and the Disability and Access Work Group discussion, there is a general need for affordable accessible housing throughout the state. However, there appears to be little variation in the availability of affordable accessible housing by location around the state, except that these units often tend to be located in the more urbanized areas.

There were no areas within the jurisdiction of the Fair Housing Team that displayed more than a low level of segregation in 2010 (as defined by the dissimilarity index), or that qualified as racially/ethnically concentrated areas of poverty in 1990, 2000, or 2010. Accordingly, there were no such areas in which residents with disabilities tended to be concentrated.

There is a relatively high demand for accessible housing in the state's more populated areas (including Casper, Cheyenne, and other cities and towns throughout the state), owing to the tendency of residents with disabilities to live in these areas. Public-assisted housing units throughout the state also tend to be concentrated in these same areas, as shown in Map V.D.1 on the following page, suggesting that the existing stock of affordable housing is distributed in a way that is (geographically) in-line with demand for accessible housing.

Nevertheless, participants in the Disability and Access Workgroup discussion noted a general shortage of affordable, accessible housing throughout the state: this shortage was not perceived to be related to the distribution of accessible housing, but rather to the overall scarcity of these units in the state.

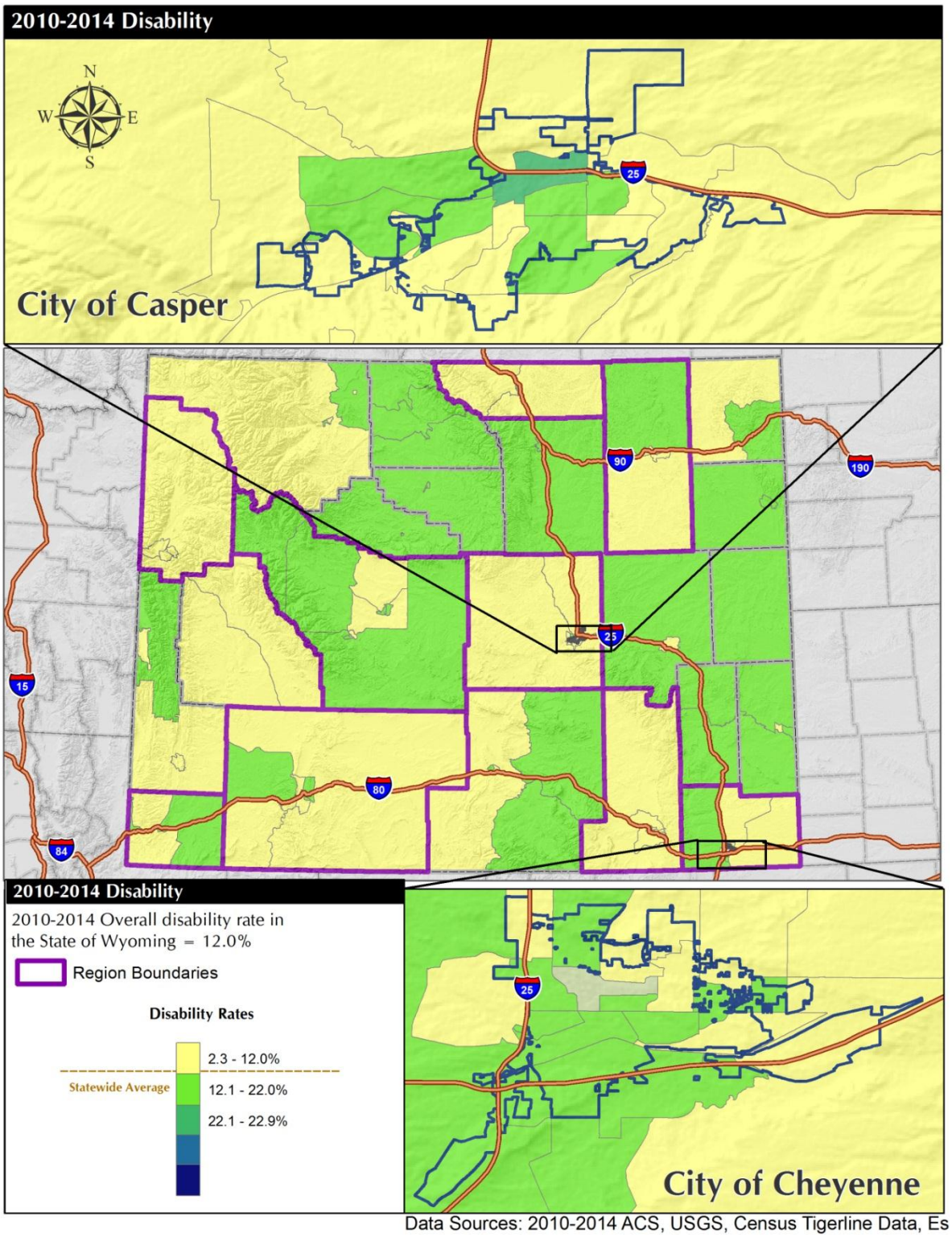
In Casper, the population with disabilities accounted for 12.1 percent of the population in 2010-2014. As shown in Table IV.66 below, residents with disabilities accounted for 32.6

percent of all assisted housing units in the city, according to disability data provided by HUD. Residents with disabilities were well-represented among assisted units of all types, with the exception of the city's eight "Other Multifamily" units, which did not include any residents with disabilities.

Table IV.66
Residents with Disabilities in Assisted Housing
The City of Casper
HUD AFFH Raw Data, 2010-2014 ACS

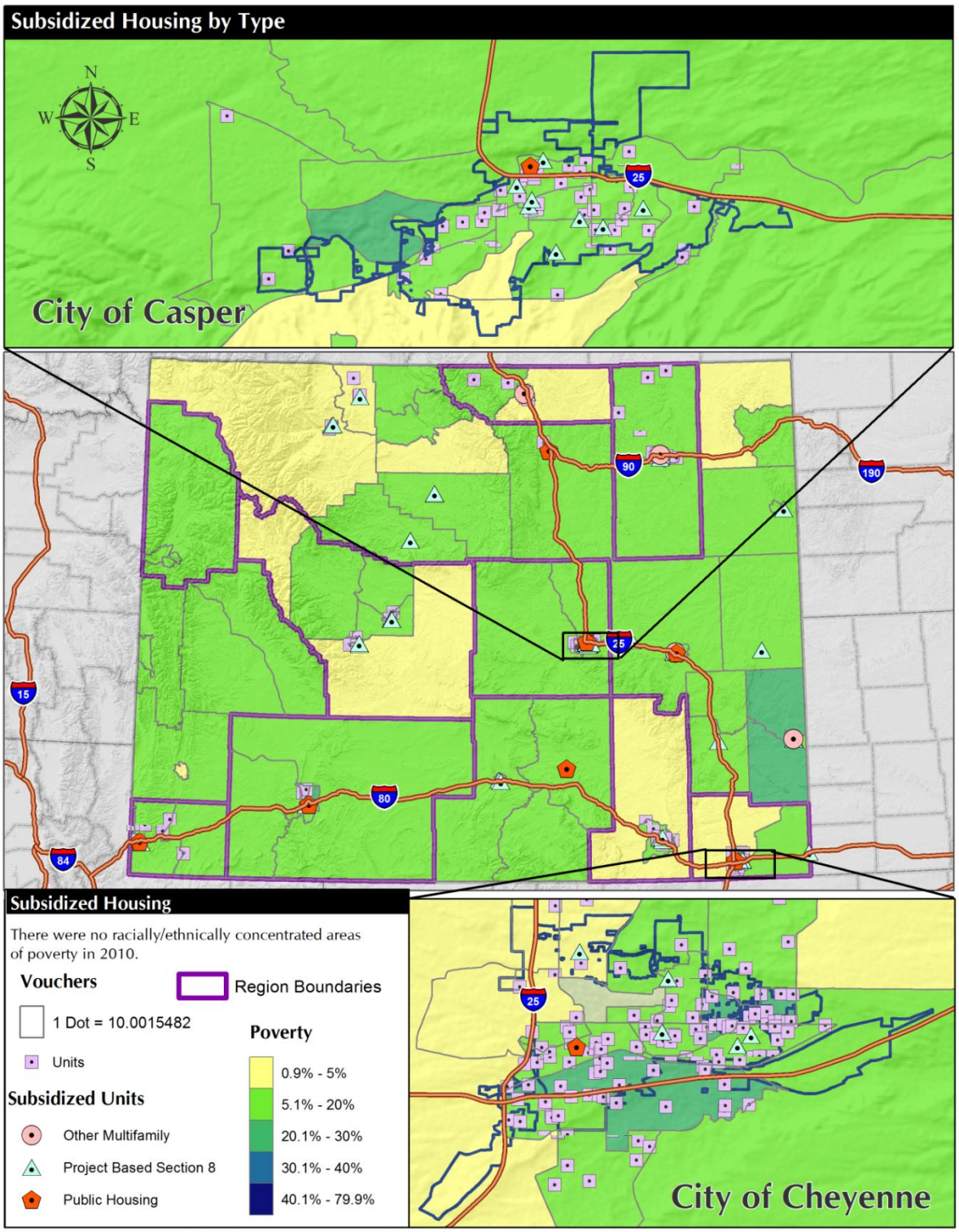
	Subsidized Housing		Total Population
Program	**Total # units**	**% with disability**	**% with disability (2010-2014 ACS)**
Public Housing	63	14.3	12.1
Project Based Section 8	496	24.7	
Other HUD Multifamily	8	0.0	
Housing Choice Vouchers	428	44.9	
Total	**995**	**32.6**	

Map IV.47
Population with Disabilities, 2010-2014
The State of Wyoming
2014 Five-Year ACS



Data Sources: 2010-2014 ACS, USGS, Census Tigerline Data, Es

Map IV.48
Public Assisted Housing Units and Poverty
The State of Wyoming
2015 HUD Raw AFFH Data, 2010-2014 ACS



Data Source: 2015 HUD AFFH Database, 2010-2014 ACS, HUD PDR Data, USGS, Census Tigerline Data, Esri

In Cheyenne, 11.9 percent of the city's population was living with some form of disability in 2010-2014. The share of assisted housing units in the city that went to residents with disabilities was roughly twice as large, at 24.2 percent, as shown in Table IV.67 below. Residents with disabilities were well-represented among assisted units of all types, including the city's 15 "Other Multifamily" units, all of which included at least one resident with disabilities.

Table IV.67
Residents with Disabilities in Assisted Housing
The City of Cheyenne
HUD AFFH Raw Data, 2010-2014 ACS

	Subsidized Housing		Total Population
Program	**Total # units**	**% with disability**	**% with disability (2010-2014 ACS)**
Public Housing	334	20.9	11.9
Project Based Section 8	210	24.2	
Other HUD Multifamily	15	100.0	
Housing Choice Vouchers	950	24.2	
Total	**1509**	**24.2**	

Residents with disabilities accounted for 12 percent of the overall state population in 2010-2014. As shown in Table IV.68 below, these residents were well-represented among assisted housing units of all types, and were present in 25.4 percent of assisted housing units overall.

Table IV.68
Residents with Disabilities in Assisted Housing
The City of Cheyenne
HUD AFFH Raw Data, 2010-2014 ACS

	Subsidized Housing		Total Population
Program	**Total # units**	**% with disability**	**% with disability (2010-2014 ACS)**
Public Housing	672	18.9	12.0
Project Based Section 8	1,867	23.5	
Other HUD Multifamily	113	23.0	
Housing Choice Vouchers	2,477	28.6	
Total	**5,129**	**25.4**	

There are no public housing agencies in the State of Wyoming that serve Non-Elderly Disabled (NED) vouchers.[33]

There were no low-income housing tax credit units in the state identified as targeting residents with disabilities included in the HUD LIHTC database.[34]

[33] *NED Baseline Database*. United States Department of Housing and Urban Development. Accessed August 18, 2016.
[34] LIHTC Database. United States Department of Housing and Urban Development. Accessed August 18, 2016.

Admissions Preferences

According to the Cheyenne Housing Authority's Admissions and Continued Occupancy Policy, "…families who are elderly, disabled, or displaced will be offered housing before other single persons."

Disproportionate Housing Needs

A comparison of maps detailing the extent of housing problems and the distribution of residents by disability do not reveal any tendency for residents with disabilities to experience disproportionate housing needs, where such needs are defined as the presence of one or more of the following housing problems:

1) Overcrowding
2) Incomplete Plumbing Facilities
3) Incomplete Kitchen Facilities
4) Cost Burden

Access to Opportunity

With regards to transportation options in the State, the Casper Area Transportation Coalition (CATC) maintains door-to-door public transport service designed specifically for the disabled or elderly.[35] After registering for the service, residents can arrange to be picked up by CATC drivers and taken to their desired destinations. There do not appear to be any significant disparities in access to opportunity for disabled residents for any of the following: government services and facilities, public infrastructure, proficient schools and education programs, and jobs.

The Wyoming Community Development Authority maintains an online multifamily rental directory with a designation for special needs for each listing to enable disabled residents to search for suitable housing.[36] According to the Cheyenne Housing Authority, all households defined as elderly, handicapped, or disabled will be admitted to housing programs before individuals or families.[37]

Reasonable Accommodation

Based on the Wyoming Fair Employment Practices Act, employers must make reasonable accommodation for the known physical or mental impairment of qualified persons unless to do so would impose an undue business hardship. Possible accommodations include making facilities accessible, job restructuring, or modifying work schedules or equipment.[38]

Disability and Access Issues Contributing Factors

1) Failure to make reasonable accommodation or modification.
2) Limited access to publicly-supported housing for persons with disabilities.

[35] http://catcbus.com/.
[36] http://www.wyomingcda.com/index.php/rentals/
[37] http://cheyennehousing.org/housing/how-to-apply
[38] http://www.blr.com/HR-Employment/Discrimination/Disabilities-ADA-in-Wyoming#.

H: Enforcement, Outreach Capacity, and Resources

Analysis
Wyoming residents or prospective residents filed 101 fair housing complaints with HUD from 2006 through 2015. Though many complaints were settled, conciliated, or otherwise resolved prior to a cause determination, none were discovered to have cause. A more complete review of these complaints, as well as complaints filed by Casper and Cheyenne residents, is included below under the heading of "Additional Information."

There are no substantially equivalent state or local fair housing agencies operating in the State of Wyoming at the current time.

There have been no housing discrimination cases filed by the Department of Justice in the State of Wyoming in the last ten years.[39]

Relevant Legislature
In 2015 the Wyoming legislature passed the Wyoming Fair Housing Act, which protects state residents from discrimination in the housing market on the basis of race, color, religion, sex, disability, familial status, or national origin; the same groups that are protected under the federal Fair Housing Act.[40]

The Wyoming Fair Housing Act does not identify a specific agency or official as the enforcing authority, but stipulates that this authority must be a "Wyoming state agency or nonprofit incorporated in Wyoming that has been accepted as an enforcing authority for Wyoming by the department of housing and urban development."[41] This agency or nonprofit will be responsible for receiving and investigating fair housing complaints, enabling and encouraging the conciliation of those complaints, and, if efforts at conciliation fail, assessing fines or penalties against violators of the state Fair Housing Act.

State and Regional Agencies
Currently there are no agencies or organizations in the state that are dedicated to providing fair housing services, whether outreach, education, or enforcement. However, the following agencies and units of local government provide fair housing information as part of their mission to affirmatively further fair housing:

- The Wyoming Community Development Authority
- The Wyoming Business Council
- The City of Casper
- The City of Cheyenne
- The Buffalo Housing Authority
- The Casper Housing Authority
- The Cheyenne Housing Authority
- The Douglas Housing Authority

[39] Housing Cases Summary Page. United States Department of Justice. Available from https://www.justice.gov/crt/housing-cases-summary-page#riga. Accessed August 19, 2016.
[40] *Wyoming Fair Housing Act*. 2015. Senate File No. SF0132.
[41] W.S. 40-26-102 (viii)

- The Evanston Housing Authority
- The Hanna Housing Authority
- The Lusk Housing Authority
- The Rock Springs Housing Authority

In addition, Equal Justice Wyoming provides information relating to fair housing on its website.[42]

None of the agencies or organizations mentioned above receives dedicated fair housing funding under either the Fair Housing Assistance Program (FHAP) or the Fair Housing Initiatives Program (FHIP). The Fair Housing Assistance Program (FHAP) was designed to support local and city agencies that enforce local fair housing laws, provided that these laws are substantially equivalent to the Fair Housing Act. The Fair Housing Initiative Program (FHIP) is designed to support fair housing organizations and other non-profits that provide fair housing services to people who believe they have faced discrimination in the housing market. These organizations provide a range of services including initial intake and complaint processing, referral of complainants to government agencies that enforce fair housing law, preliminary investigations of fair housing complaints, and education and outreach on fair housing law and policy.

With the recent passage of the Wyoming Fair Housing Act comes the potential for HUD-supported, state-level fair housing enforcement. The Act does not designate a specific agency to enforce the law, but recognizes as the enforcing authority "a state agency or nonprofit incorporated in Wyoming that was been accepted as an enforcing authority for Wyoming by the department of housing and urban development."[43] In order to participate in the FHAP and receive reimbursements from HUD for enforcement of the state Fair Housing Act, this agency would need to be certified "substantially equivalent" under the FHAP.

Substantial equivalency certification is a two-phase process: in the first phase, the Assistant Secretary for Fair Housing and Equal Opportunity determines whether a state or local law, as written, recognizes legal rights and provides legal remedies that are similar to those provided by the federal Fair Housing Act (FHA). Once this determination has been made, and the law has been judged to be substantially equivalent, the agency enforcing the law is certified on an interim basis for a period of three years. During those three years, the local enforcement organization "builds its capacity to operate as a fully certified substantially equivalent agency." FHAP grants during this time period are issued to support the process of building capacity. When the interim certification period ends after three years, the Assistant Secretary issues a determination on whether or not the city law is substantially equivalent to the Fair Housing Act "in operation", this is the second phase of the certification process. If the law is judged to be substantially equivalent in operation, the agency enforcing the law is fully certified as a substantially equivalent agency for five years.

[42] Equal Justice Wyoming. http://www.legalhelpwy.org/index.php/get-legal-help/self-help-2/housing/fair-housing/ Accessed August 18, 2016.
[43] *Wyoming Fair Housing Act.* 2015. Senate File No. SF0132.

Additional Information

To assess the degree to which residents may have faced discrimination in the housing market, or perceive themselves to have faced such discrimination, the 2017 Assessment of Fair Housing includes a review of fair housing complaints filed with the U.S. Department of Housing and Urban Development from 2006 through 2015. The following narrative offers a summary of those complaints for the cities of Casper and Cheyenne, as well as the state as a whole.

THE CITY OF CASPER: FAIR HOUSING COMPLAINTS

Residents of Casper filed 21 fair housing complaints with HUD from 2006 through 2015. As shown in Table IV.69 below, nearly half of these complaints included allegations of discrimination based on disability. Four complaints related to discrimination based on familial status, while two each related to race, religion, retaliation, and sex. Complaints based on retaliation relate to situations in which a housing provider seeks to punish a resident or housing seeker in some way for attempting to exercise his or her housing rights: e.g., eviction in response to a fair housing complaint.

Table IV.69
Fair Housing Complaints by Basis
City of Casper
2006–2015 HUD Data

Basis	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	Total
Disability	1	2		1			1	3		2	10
Family Status		1		2					1		4
Race			1					1			2
Religion	1	1									2
Retaliation		2									2
Sex	1	1									2
Total Bases	**3**	**7**	**1**	**3**			**1**	**4**	**1**	**2**	**22**
Total Complaints	3	7	1	3			1	3	1	2	21

As shown in Table IV.70 below, these complaints most commonly cited failure to make reasonable accommodation on the part of the housing provider. This is a discriminatory "issue" that impacts residents with disabilities. The next most common complaints included discriminatory terms, conditions, privileges, or services and facilities; cited in 8 complaints; and discriminatory refusal to rent; cited in 6 complaints.

Table IV.70
Fair Housing Complaints by Issue
City of Casper
2006–2015 HUD Data

Issue	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	Total
Failure to make reasonable accommodation	1	2		1			1	3		1	9
Discriminatory terms, conditions, privileges, or services and facilities		1	1				1	3		2	8
Discriminatory refusal to rent		1	1	2			1		1		6
Discrimination in term, conditions or privileges relating to rental		2		1					1		4
Discriminatory refusal to rent and negotiate for rental	2										2
Discriminatory advertising, statements and notices				1					1		2
Discriminatory acts under Section 818 (coercion, etc.)		2									2
Failure to permit reasonable modification										2	2
Otherwise deny or make housing available								1			1
Total Issues	**3**	**8**	**2**	**5**	**0**	**0**	**3**	**7**	**3**	**5**	**36**
Total Complaints	3	7	1	3			1	3	1	2	21

These complaints were most commonly determined to be without cause, as shown in Table IV.71 below, meaning that a HUD investigation of the complaint did not produce sufficient evidence to support a charge of housing discrimination. Seven complaints were closed after no cause was found. Five complaints were resolved through conciliation or settlement, and one was withdrawn after resolution.

Table IV.71
Fair Housing Complaints by Closure Status
City of Casper
2006–2015 HUD Data

Closure Status	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	Total
No Cause	1	3	1	1					1		7
Conciliated / Settled	1			2			1	1			5
Complainant Failed to Cooperate	1	2									3
Withdrawal Without Resolution								2			2
Open										2	2
Unable to Locate Respondent		1									1
Withdrawal After Resolution		1									1
Total Complaints	**3**	**7**	**1**	**3**			**1**	**3**	**1**	**2**	**21**

The bases of complaints that were resolved, whether by conciliation or settlement or through some other means, are presented in Table IV.72 on the following page. As shown, complaints based on disability, family status, and religion were equally represented, each having been cited in 2 complaints.

Table IV.72
Resolved Fair Housing Complaints by Basis
City of Casper
2006–2015 HUD Data

Basis	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	Total
Disability							1	1			2
Family Status				2							2
Religion	1	1									2
Total Bases	**1**	**1**		**2**			**1**	**1**			**6**
Total Complaints	1	1		2			1	1			6

Discriminatory refusal to rent was the most common allegation among those that were successfully resolved, as shown in Table IV.73 below: half of all resolved complaints included this allegation. The next most common issues cited in resolved complaints were discriminatory terms, conditions, privileges, or services and facilities. This issue, along with failure to make reasonable accommodation, was cited in two resolved complaints.

Table IV.73
Resolved Fair Housing Complaints by Issue
City of Casper
2006–2015 HUD Data

Issue	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	Total
Discriminatory refusal to rent				2			1				3
Discriminatory terms, conditions, privileges, or services and facilities							1	1			2
Failure to make reasonable accommodation							1	1			2
Discriminatory refusal to rent and negotiate for rental	1										1
Discriminatory advertising, statements and notices				1							1
Discrimination in term, conditions or privileges relating to rental		1									1
Total Issues	**1**	**1**	**0**	**3**	**0**	**0**	**3**	**2**	**0**	**0**	**10**
Total Complaints	1	1		2			1	1			6

THE CITY OF CHEYENNE: FAIR HOUSING COMPLAINTS

Residents of Cheyenne filed 30 fair housing complaints in the period from 2006 and 2015. As shown in Table IV.74 below, more than half of these included allegations of housing discrimination based on disability, which figured in 18 complaints. Six complaints included allegations of race-based discrimination, and four cited discrimination based on sex.

Table IV.74
Fair Housing Complaints by Basis
City of Cheyenne
2006–2015 HUD Data

Basis	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	Total
Disability		1	4	2	1	3	2	2	1	2	18
Race				1	1	1		2	1		6
Sex	1			1			1			1	4
Retaliation			1	1		1					3
Family Status	1							1			2
Total Bases	**2**	**1**	**5**	**5**	**2**	**5**	**3**	**5**	**2**	**3**	**33**
Total Complaints	2	1	5	3	2	5	3	4	2	3	30

Sixteen complaints; a majority of those filed against housing providers in Cheyenne, cited failure to make reasonable accommodation, as shown in Table IV.75 below. As in Caser, the next most common complaint alleged discriminatory terms, conditions, privileges, or services and facilities.

Table IV.75
Fair Housing Complaints by Issue
City of Cheyenne
2006–2015 HUD Data

Issue	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	Total
Failure to make reasonable accommodation		1	4	2	1	3	1	2	1	1	16
Discriminatory terms, conditions, privileges, or services and facilities				1		3	1	4	2	3	14
Otherwise deny or make housing available				1		1	1	1	2	1	7
Discriminatory refusal to rent	1				1	1	1	1		1	6
Discriminatory acts under Section 818 (coercion, etc.)	1		1	1		1			1		5
Discriminatory advertising, statements and notices						1	1	1		1	4
Discrimination in term, conditions or privileges relating to rental	1		2								3
Failure to permit reasonable modification				1			1				2
Discriminatory refusal to negotiate for rental						1					1
Total Issues	**3**	**1**	**7**	**6**	**2**	**11**	**6**	**9**	**6**	**7**	**58**
Total Complaints	2	1	5	3	2	5	3	4	2	3	30

These complaints were most commonly conciliated or settled, as shown in Table IV.76 below. Thirteen complaints were resolved in this way, while 7 were close when the complainant failed to cooperate and 5 were closed after a "no cause" determination.

Table IV.76
Fair Housing Complaints by Closure Status
City of Cheyenne
2006–2015 HUD Data

Closure Status	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	Total
Conciliated / Settled	1	1	3	1		3	2		2		13
Complainant Failed to Cooperate	1		1		1	1		2		1	7
No Cause			1	2	1		1				5
Withdrawal Without Resolution						1		2			3
Open										2	2
Total Complaints	**2**	**1**	**5**	**3**	**2**	**5**	**3**	**4**	**2**	**3**	**30**

Complaints that were resolved through conciliation or settlement most commonly cited discrimination based on disability, which figured in 9 of the 13 resolved complaints. As shown in Table IV.77 below, two complaints alleged discrimination based on race, two cited retaliation, and one cited discrimination based on familial status.

Table IV.77
Resolved Fair Housing Complaints by Basis
City of Cheyenne
2006–2015 HUD Data

Basis	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	Total
Disability		1	2	1		2	2		1		9
Race						1			1		2
Retaliation			1			1					2
Family Status	1										1
Total Bases	**1**	**1**	**3**	**1**		**4**	**2**		**2**		**14**
Total Complaints	1	1	3	1		3	2		2		13

A majority of complaints resolved through conciliation or settlement cited failure to make reasonable accommodation, as shown in Table IV.78 below. The next most common fair housing issue cited was discriminatory terms, conditions, privileges, or services and facilities, included in four resolved complaints.

Table IV.78
Resolved Fair Housing Complaints by Issue
City of Cheyenne
2006–2015 HUD Data

Issue	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	Total
Failure to make reasonable accommodation		1	2	1		2	1		1		8
Discriminatory terms, conditions, privileges, or services and facilities						2			2		4
Discriminatory refusal to rent	1					1	1				3
Otherwise deny or make housing available							1		2		3
Discriminatory acts under Section 818 (coercion, etc.)			1			1			1		3
Discriminatory advertising, statements and notices						1	1				2
Failure to permit reasonable modification				1			1				2
Discriminatory refusal to negotiate for rental						1					1
Discrimination in term, conditions or privileges relating to rental			1								1
Total Issues	**1**	**1**	**4**	**2**	**0**	**8**	**5**	**0**	**6**	**0**	**27**
Total Complaints	1	1	3	1		3	2		2		13

THE STATE OF WYOMING: FAIR HOUSING COMPLAINTS

Statewide, residents filed 101 fair housing complaints with HUD from 2006 through 2015. As shown in Table IV.79 below, sixty of those complaints cited discrimination based on disability, or around 60 percent. The next most common complaints alleged discrimination based on race and family status, which figured in 14 and 13 complaints, respectively. Twelve complaints included allegations of retaliation.

Table IV.79
Fair Housing Complaints by Basis
State of Wyoming
2006–2015 HUD Data

Basis	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	Total
Disability	3	8	9	7	4	5	6	6	5	7	60
Race	1	1	2	1	1	1	2	3	1	1	14
Family Status	2	1	1	2		2	1	2	2		13
Retaliation		4	2	2		2	1		1		12
Sex	2	1		1	1		1		1	1	8
Religion	1	1								1	3
Color								1			1
Total Bases	**9**	**16**	**14**	**13**	**6**	**10**	**11**	**12**	**10**	**10**	**111**
Total Complaints	9	15	13	13	6	9	9	9	9	9	101

As one might expect, given the prevalence of disability-based complaints at the state level, failure to make reasonable accommodation was the most commonly cited discriminatory issue in complaints from residents throughout the state. As shown in Table IV.80 on the following page, fifty complaints; nearly half; included allegations that the housing provider was unwilling

to make a reasonable accommodation for a residents with disabilities. Discriminatory terms conditions, privileges, or services and facilities was the next most common issue.

Table IV.80
Fair Housing Complaints by Issue
State of Wyoming
2006–2015 HUD Data

Issue	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	Total
Failure to make reasonable accommodation	2	7	8	5	4	5	5	6	3	5	50
Discriminatory terms, conditions, privileges, or services and facilities	1	3	3	4		4	6	8	7	9	45
Discriminatory refusal to rent	2	3	3	4	3	3	5	1	1	1	26
Otherwise deny or make housing available				1		1	4	2	6	4	18
Discrimination in term, conditions or privileges relating to rental	2	4	3	3	1			1	2		16
Discriminatory acts under Section 818 (coercion, etc.)	1	3	2	1		2	1		5	1	16
Discriminatory advertising, statements and notices	1	1		1		2	3	1	2	2	13
Failure to permit reasonable modification		1		1			1			2	5
Discriminatory refusal to rent and negotiate for rental	2					1					3
Discriminatory refusal to negotiate for rental						1		1			2
Discriminatory refusal to sell and negotiate for sale		1									1
False denial or representation of availability - rental	1										1
Total Issues	**12**	**23**	**19**	**20**	**8**	**19**	**25**	**20**	**26**	**24**	**196**
Total Complaints	9	15	13	13	6	9	9	9	9	9	101

As in Cheyenne, conciliation or settlement was the most common outcome for fair housing complaints filed throughout the case. As shown in Table IV.81 below, thirty-seven complaints were resolved in this way, while 6 were withdrawn after resolution. Thirty-two complaints were closed after a HUD investigation was unable to produce sufficiency evidence to support a charge of discrimination.

Table IV.81
Fair Housing Complaints by Closure Status
State of Wyoming
2006–2015 HUD Data

Closure Status	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	Total
Conciliated / Settled	3	2	5	4		5	7	2	7	2	37
No Cause	4	7	6	7	3	1	2		2		32
Complainant Failed to Cooperate	2	3	2		1	1		2		1	12
Withdrawal Without Resolution						1		4		1	6
Withdrawal After Resolution		1		2	2			1			6
Administrative Hearing Ended – No Discrimination Found		1									1
FHAP Judicial Consent Order						1					1
Unable to Locate Respondent		1									1
Open										5	5
Total Complaints	**9**	**15**	**13**	**13**	**6**	**9**	**9**	**9**	**9**	**9**	**101**

A considerable majority of resolved complaints throughout the state included allegations of discrimination based on disability: around 72 percent, in fact. As shown in Table IV.82 on the following page, the next most common complaints cited discrimination based on familial status and retaliation, which each figured in 6 complaints.

Table IV.82
Resolved Fair Housing Complaints by Basis
State of Wyoming
2006–2015 HUD Data

Basis	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	Total
Disability	1	2	4	3	2	4	6	2	5	2	31
Family Status	1			2			1	1	1		6
Retaliation			1	1		2	1		1		6
Race						1	1		1		3
Religion	1	1									2
Color								1			1
Total Bases	**3**	**3**	**5**	**6**	**2**	**7**	**9**	**4**	**8**	**2**	**49**
Total Complaints	3	3	5	6	2	5	7	3	7	2	43

Failure to make reasonable accommodation was the most common discriminatory issue cited, figuring in 26 complaints, or just over half. As shown in Table IV.83 below, discriminatory terms, conditions, privileges, or services and facilities was the next most common allegation, figuring in 19 complaints, followed by discriminatory refusal to rent, which was cited in 12 complaints.

Table IV.83
Resolved Fair Housing Complaints by Issue
State of Wyoming
2006–2015 HUD Data

Issue	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	Total
Failure to make reasonable accommodation		2	4	2	2	4	5	2	3	2	26
Discriminatory terms, conditions, privileges, or services and facilities				1		2	5	2	7	2	19
Discriminatory refusal to rent	2			4		2	4				12
Otherwise deny or make housing available							4		5	1	10
Discriminatory acts under Section 818 (coercion, etc.)			1			2	1		4	1	9
Discriminatory advertising, statements and notices	1			1		1	3		1	1	8
Discrimination in term, conditions or privileges relating to rental		2	1	1				1			5
Discriminatory refusal to negotiate for rental						1		1			2
Failure to permit reasonable modification				1			1				2
Discriminatory refusal to rent and negotiate for rental	1										1
Total Issues	**4**	**4**	**6**	**10**	**2**	**12**	**23**	**6**	**20**	**7**	**94**
Total Complaints	3	3	5	6	2	5	7	3	7	2	43

Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

i. Lack of State or local private fair housing outreach and enforcement
ii. Lack of State or local public fair housing enforcement
iii. Lack of resources for fair housing agencies and organizations

The Table V.1 below provides a list of the factors that have been identified as contributing to these fair housing issues, and prioritizes them according to the two following criteria:

1. High: Factors that have a direct and substantial impact on fair housing choice;
2. Low: Factors that have a slight or largely indirect impact on fair housing choice, or that the Team has little capacity to address.

Table V.13
Fair Housing Contributing Factors and Priorities

Contributing Factor	Priority	Discussion
Lack of availability of affordable units in a range of sizes	High	There is a need for additional assisted housing throughout the state. Racial or ethnic minority households are more likely to be experiencing a disproportionate need due to cost burdens, incomplete plumbing or kitchen facilities, or overcrowding. This contributing factor has been assigned a medium level of priority based on the extent of the need and the state's ability to respond to this need. The ability of the state to respond to this need is limited in some cases by scarce resources and in others by high rental vacancy rates.
Economic forces (rising unemployment, declining oil and gas production, growth in rental costs)	Low	The state has seen a marked reversal in many economic indicators in the last year: Statewide, the unemployment rate stood at 5.2 percent in March of 2016, or 1.3 percentage points higher than it had been a year earlier. In some counties throughout the state, as much as 8 percent of the labor force was out of work at that time. Though the state will work to promote broader access to opportunity in the coming years, its ability to directly impact natural and global economic forces is limited.
Higher mortgage denial rates for racial and ethnic minorities	High	The ability of residents throughout the state to secure home purchase loans varies according to the race and ethnicity of the loan applicant. The overall denial rate for American Indian applicants from 2008 through 2014, at 31.4 percent, was well above the statewide average of 14.2 percent. The denial rate for Hispanic applicants, at around 21 percent, was considerably higher than the denial rate for non-Hispanic applicants (12.9 percent). This was identified in data gathered under the Home Mortgage Disclosure Act (HMDA). The state has designated efforts to address this factor to be of "high" priority.
Failure to make reasonable accommodation or modification	High	Residents and stakeholders who provided commentary during the AFH process, whether through public input sessions or the Fair Housing Survey, identified failure to make reasonable accommodation as a factor that contributes to the limited availability of accessible housing units to residents with disabilities. The State believes that it has the capacity to address this factor through outreach and education to state residents and landlords, and considers doing so to be a high priority.
Lack of access to housing for persons with disabilities	High	Residents and stakeholders who provided commentary during the AFH process, whether through public input sessions or the Fair Housing Survey, identified shortages of affordable, accessible housing to be a contributing factor to fair housing issues impacting residents with disabilities.
Lack of resources for fair housing agencies and organizations	High	The Wyoming Fair Housing Act of 2015 provides an "enforcing authority" with the power to administer and enforce the Act, but does not name a specific agency or entity as enforcing authority. As yet, no such agency has been identified. Because the ability of the state to receive HUD funding to enforce the law is contingent upon the identification of an agency for that purpose, the state is not able to access funding through the Fair Housing Assistance Program. However, the State wishes to change this.
Lack of state or local public fair housing outreach and enforcement	High	The Wyoming Fair Housing Act of 2015 provides an "enforcing authority" with the power to administer and enforce the Act, but does not name a specific agency or entity as enforcing authority. As yet, no such agency has been identified. The State considers this factor to be within its capacity to address, and that doing so will potentially give the state access to additional resources to provide fair housing outreach and enforcement.
Resistance to affordable housing production	High	This factor, identified through the feedback of stakeholders during the public input portion of the AFH process, contributes to a lack of affordable housing in the state. Lack of affordable housing restricts the fair housing choice of state residents.
Discriminatory actions in the market place	High	This factor, identified through the feedback of stakeholders during the public input portion of the AFH process, serves to limit the fair housing choice of residents with disabilities and racial/ethnic minority groups.
Lack of understanding of fair housing law	High	This factor, identified through the feedback of stakeholders during the public input portion of the AFH process, contributes to discrimination and differential treatment in the housing market. Furthermore, a lack of understanding of fair housing law means that those who may suffer discrimination in the housing market do not know where to turn when they do. The Fair Housing Team has assigned this factor a priority of “high”.

Based on these contributing factors and priorities, the Fair Housing Team has proposed a series of goals and actions designed to address fair housing issues in the state. These issues, and the goals that seek to address them, are listed in a series of tables beginning with Table V.2 on the following page, which pertains to the state as a whole. Tables V.3 through V.4 outline fair housing goals for the cities of Casper and Cheyenne, respectively. Table V.5 through Table V.12 present fair housing issues and goals pertinent to the service areas of Public Housing authorities in Casper, Cheyenne, and the Qualifying Housing Authorities in Buffalo, Douglas, Evanston, Hanna, Lusk, and Rock Springs.

Table V.14

The State of Wyoming
2017 Assessment of Fair Housing

Fair Housing Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant
Promote Development of Affordable Housing Units in the State	Availability of Affordable Units in a Range of Sizes	Disproportionate Housing Needs	Identify opportunities for affordable housing developments; construct or rehab 125 such units over this next five year	Wyoming Community Development Authority (WCDA) and Wyoming Business Council (WBC)
	Economic forces (rising unemployment, declining oil and gas production, historical growth in rental costs)	Publicly supported housing location and occupancy.	Establish a policy to reach out to landlords, particularly in areas with high rental vacancy rates, and encourage them to participate in the housing choice voucher program.	Wyoming Department of Family Services (DFS)
	Resistance to affordable housing NIMBY is a concern			Wyoming Department of Health (WDH)
Discussion: The incidence of housing problems in the State of Wyoming differs according to the race and ethnicity of the head of household. While a quarter of households in the state experienced some form of housing problem in 2008-2012, more than a third of black, Asian or Pacific Islander, and Native American households were experiencing a housing problem during that time period. The same was true of Hispanic households, along with large family and non-family households. While there is a considerable need for affordable housing, high rental vacancy rates in much of the state make it difficult to site affordable housing units in those areas.				
Promote equitable access to credit and home lending	Access to financial services.	Disparities in Access to Opportunity	Reduce disparities in home lending application outcomes through annual credit education and outreach.	WCDA, WBC, DFS, and WDH
Discussion: Denial rates for owner-occupied home-purchase loan applications differed according to the race and ethnicity of the applicant. Denial rates for American Indian applicants, at 31.4 percent, were well above the statewide average of 14.2 percent. Similarly, around 21 percent of applications from Hispanic applicants were denied, compared to a denial rate of 12.9 percent for non-Hispanic applicants. These discrepancies persisted even when income was taken into account.				
Increase the supply of housing units accessible to residents with disabilities.	Failure to make reasonable accommodation or modification	Disparities in Access to Opportunity	Ensure compliance with ADA and FHA accessibility requirements in newly constructed publicly assisted housing on an ongoing basis through inspections.	WCDA, WBC, DFS, and WDH
	Access to publicly supported housing for persons with disabilities		Provide outreach and education to landlords and housing providers relating to the requirements of the ADA and FHA concerning accessibility annually	
Discussion: Based on feedback provided by stakeholders and members of the public during the 2016 AFH process, residents with disabilities face limitations in the supply of affordable, accessible housing. Though residents with disabilities are generally well-represented among households living in public-assisted units, there remains a need for additional housing suitable for residents with disabilities. In addition, based on the relatively high number of complaints from residents with disabilities and additional feedback received during the public review process, there is a need to ensure that landlords and property managers throughout the state respond appropriately to requests for reasonable accommodation or modification.				
Designate an agency to serve as the enforcing authority for the Wyoming Fair Housing Act.	Lack of resources for fair housing agencies and organizations	Disparities in Access to Opportunity	In year one, identify a state agency to serve as enforcing authority for the Wyoming Fair Housing Act.	WCDA, WBC, DFS, and WDH
	Lack of State or local private fair housing outreach and		Encourage/direct the designated enforcing agency to apply for funding under the Fair Housing Assistance	WCDA, WBC, DFS, and WDH

	enforcement		Program (FHAP) to support its fair housing efforts. Provide resources to the enforcing authority so that it may initiate fair housing testing.	
Discussion: The passage of the Wyoming Fair Housing Act in 2015 was a positive step toward ensuring that state residents have access to fair housing choice and providing recourse under state law for those who believe that they have experienced unlawful discrimination in the housing market. However, the Act does not identify a specific state agency as enforcing authority, which leaves a substantial gap in the state's fair housing infrastructure.				
Reduce Discrimination in Rental Market	Lack of understanding of fair housing law Discriminatory actions in the marketplace	Disparities in Access to Opportunity Disparities in Access to Opportunity	Provide outreach and education on a yearly basis. Provide fair housing seminars at annual conferences (e.g., WyoNAHRO) Provide an opportunity for remote/web-based participation in all fair housing events	WCDA, WBC, DFS, and WDH
Discussion: This fair housing goal was identified in the previous statewide analysis of impediments to fair housing choice, and has been included in an ongoing effort to address housing discrimination in the rental housing market.				
Reduce NIMBYism and restrictive building codes and practices in rural areas of Wyoming	Lack of understanding of fair housing law Resistance to affordable housing	Disparities in Access to Opportunity Disparities in Access to Opportunity	Provide outreach and education on a yearly basis. Provide fair housing seminars or presentations, such as at annual conferences (e.g., WyoNAHRO) Provide an opportunity for remote/web-based participation in all fair housing events	WCDA, WBC, DFS, and WDH
Discussion: This fair housing goal was identified in the previous statewide analysis of impediments to fair housing choice, and has been included in an ongoing effort to address restrictive policies regarding regarding accessible/affordable housing.				

Table V.15

The City of Casper
2017 Assessment of Fair Housing

Fair Housing Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant
Promote Development of Affordable Housing Units in the City	Availability of Affordable Units in a Range of Sizes Economic forces (rising unemployment, declining oil and gas production, historical growth in rental costs) Resistance to affordable housing NIMBY is a concern	Disproportionate Housing Needs Publicly supported housing location and occupancy.	Identify opportunities for affordable housing developments; construct or rehab 25 such units over this next five year Establish a policy to reach out to landlords, particularly in areas with high rental vacancy rates, and encourage them to participate in the housing choice voucher program.	The City of Casper
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Promote equitable access to credit and home lending	Access to financial services.	Disparities in Access to Opportunity	Reduce disparities in home lending application outcomes through participating in annual credit education and outreach.	The City of Casper
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Increase the supply of housing units accessible to residents with disabilities.	Failure to make reasonable accommodation or modification Access to publicly supported housing for persons with disabilities	Disparities in Access to Opportunity	Ensure compliance with ADA and FHA accessibility requirements in newly constructed publicly assisted housing on an ongoing basis through inspections. Provide outreach and education to landlords and housing providers relating to the requirements of the ADA and FHA concerning accessibility	The City of Casper
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Reduce Discrimination in Rental Market	Lack of understanding of fair housing law Discriminatory actions in the marketplace	Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The City of Casper
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Reduce NIMBYism and restrictive building codes and practices	Lack of understanding of fair housing law Resistance to affordable housing	Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The City of Casper

Table V.16

The City of Cheyenne
2017 Assessment of Fair Housing

Fair Housing Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant
Promote Development of Affordable Housing Units in the City	Availability of Affordable Units in a Range of Sizes Economic forces (rising unemployment, declining oil and gas production, historical growth in rental costs) Resistance to affordable housing NIMBY is a concern	Disproportionate Housing Needs Publicly supported housing location and occupancy.	Identify opportunities for affordable housing developments; construct or rehab 25 such units over this next five year Establish a policy to reach out to landlords, particularly in areas with high rental vacancy rates, and encourage them to participate in the housing choice voucher program.	The City of Cheyenne
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Promote equitable access to credit and home lending	Access to financial services.	Disparities in Access to Opportunity	Reduce disparities in home lending application outcomes through participating in annual credit education and outreach.	The City of Cheyenne
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Increase the supply of housing units accessible to residents with disabilities.	Failure to make reasonable accommodation or modification Access to publicly supported housing for persons with disabilities	Disparities in Access to Opportunity	Ensure compliance with ADA and FHA accessibility requirements in newly constructed publicly assisted housing on an ongoing basis through inspections Provide outreach and education to landlords and housing providers relating to the requirements of the ADA and FHA concerning accessibility annually	The City of Cheyenne
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Reduce Discrimination in Rental Market	Lack of understanding of fair housing law Discriminatory actions in the marketplace	Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The City of Cheyenne
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Reduce NIMBYism and restrictive building codes and practices	Lack of understanding of fair housing law Resistance to affordable housing	Disparities in Access to Opportunity Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The City of Cheyenne

Table V.17
Casper Housing Authority
2017 Assessment of Fair Housing

Fair Housing Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant
Promote Development of Affordable Housing Units in the Service Area	Economic forces (rising unemployment, declining oil and gas production, historical growth in rental costs) Resistance to affordable housing NIMBY is a concern	Publicly supported housing location and occupancy.	Reach out to landlords, particularly in areas with high rental vacancy rates, and encourage them to participate in the housing choice voucher program.	The Casper Housing Authority
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Increase the supply of housing units accessible to residents with disabilities.	Failure to make reasonable accommodation or modification Access to publicly supported housing for persons with disabilities	Disparities in Access to Opportunity	Ensure compliance with ADA and FHA accessibility requirements in newly constructed publicly assisted housing on an ongoing basis through inspections Provide outreach and education to landlords and housing providers relating to the requirements of the ADA and FHA concerning accessibility annually	The Casper Housing Authority
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Reduce Discrimination in Rental Market	Lack of understanding of fair housing law Discriminatory actions in the marketplace	Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The Casper Housing Authority
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Reduce NIMBYism and restrictive building codes and practices	Lack of understanding of fair housing law Resistance to affordable housing	Disparities in Access to Opportunity Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The Casper Housing Authority

Table V.18

Cheyenne Housing Authority
2017 Assessment of Fair Housing

Fair Housing Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant
Promote Development of Affordable Housing Units in the Service Area	Economic forces (rising unemployment, declining oil and gas production, historical growth in rental costs) Resistance to affordable housing NIMBY is a concern	Publicly supported housing location and occupancy.	Reach out to landlords, particularly in areas with high rental vacancy rates, and encourage them to participate in the housing choice voucher program.	
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Increase the supply of housing units accessible to residents with disabilities.	Failure to make reasonable accommodation or modification Access to publicly supported housing for persons with disabilities	Disparities in Access to Opportunity	Ensure compliance with ADA and FHA accessibility requirements in newly constructed publicly assisted housing on an ongoing basis. Through inspections Provide outreach and education to landlords and housing providers relating to the requirements of the ADA and FHA concerning accessibility annually	The Cheyenne Housing Authority
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Reduce Discrimination in Rental Market	Lack of understanding of fair housing law Discriminatory actions in the marketplace	Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The Cheyenne Housing Authority
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Reduce NIMBYism and restrictive building codes and practices	Lack of understanding of fair housing law Resistance to affordable housing	Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The Cheyenne Housing Authority

Table V.19

Buffalo Housing Authority
2017 Assessment of Fair Housing

Fair Housing Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant
Reduce Discrimination in Rental Market	Lack of understanding of fair housing law Discriminatory actions in the marketplace	Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The Buffalo Housing Authority
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Reduce NIMBYism and restrictive building codes and practices	Lack of understanding of fair housing law Resistance to affordable housing	Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The Buffalo Housing Authority

Table V.20

Douglas Housing Authority
2017 Assessment of Fair Housing

Fair Housing Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant
Reduce Discrimination in Rental Market	Lack of understanding of fair housing law Discriminatory actions in the marketplace	Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The Douglas Housing Authority
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Reduce NIMBYism and restrictive building codes and practices	Lack of understanding of fair housing law Resistance to affordable housing	Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The Douglas Housing Authority

Table V.21
Evanston Housing Authority
2017 Assessment of Fair Housing

Fair Housing Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant
Increase the supply of housing units accessible to residents with disabilities.	Failure to make reasonable accommodation or modification Access to publicly supported housing for persons with disabilities	Disparities in Access to Opportunity	Ensure compliance with ADA and FHA accessibility requirements in newly constructed publicly assisted housing on an ongoing basis through inspections Provide outreach and education to landlords and housing providers relating to the requirements of the ADA and FHA concerning accessibility annually	The Evanston Housing Authority
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Reduce Discrimination in Rental Market	Lack of understanding of fair housing law Discriminatory actions in the marketplace	Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The Evanston Housing Authority
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Reduce NIMBYism and restrictive building codes and practices	Lack of understanding of fair housing law Resistance to affordable housing	Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The Evanston Housing Authority

Table V.22
Hanna Housing Authority
2017 Assessment of Fair Housing

Fair Housing Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant
Reduce Discrimination in Rental Market	Lack of understanding of fair housing law Discriminatory actions in the marketplace	Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The Hanna Housing Authority
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Reduce NIMBYism and restrictive building codes and practices	Lack of understanding of fair housing law Resistance to affordable housing	Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The Hanna Housing Authority

Table V.23
Lusk Housing Authority
2017 Assessment of Fair Housing

Fair Housing Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant
Reduce Discrimination in Rental Market	Lack of understanding of fair housing law Discriminatory actions in the marketplace	Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The Lusk Housing Authority
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Reduce NIMBYism and restrictive building codes and practices	Lack of understanding of fair housing law Resistance to affordable housing	Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The Lusk Housing Authority

Table V.24

Rock Springs Housing Authority
2017 Assessment of Fair Housing

Fair Housing Goal	Contributing Factors	Fair Housing Issues	Metrics, Milestones, and Timeframe for Achievement	Responsible Program Participant
Increase the supply of housing units accessible to residents with disabilities.	Failure to make reasonable accommodation or modification Access to publicly supported housing for persons with disabilities	Disparities in Access to Opportunity	Ensure compliance with ADA and FHA accessibility requirements in newly constructed publicly assisted housing on an ongoing basis through inspections Provide outreach and education to landlords and housing providers relating to the requirements of the ADA and FHA concerning accessibility annually	The Rock Springs Housing Authority
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Reduce Discrimination in Rental Market	Lack of understanding of fair housing law Discriminatory actions in the marketplace	Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The Rock Springs Housing Authority
Fair Housing Goal	**Contributing Factors**	**Fair Housing Issues**	**Metrics, Milestones, and Timeframe for Achievement**	**Responsible Program Participant**
Reduce NIMBYism and restrictive building codes and practices	Lack of understanding of fair housing law Resistance to affordable housing	Disparities in Access to Opportunity Disparities in Access to Opportunity	Provide outreach and education on a yearly basis.	The Rock Springs Housing Authority