



## TITLE VI PLAN

Approved by the  
Washington State Department of Transportation 2018

Spokane Regional Transportation Council  
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**Spokane Regional Transportation Council  
Title VI Plan**

**Policy Statement:**

The Spokane Regional Transportation Council assures that no person shall on the grounds of race, color, national origin, or sex, as provided by Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987 (P.L. 100.259) be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity. SRTC further assures every effort will be made to ensure non-discrimination in all of its programs and activities, whether those programs and activities are federally funded or not.

The Civil Rights Restoration Act of 1987, broadened the scope of Title VI coverage by expanding the definition in terms “programs or activities” to include all programs or activities of Federal Aid recipients, sub-recipients, and contractors/consultants, whether such programs and activities are federally assisted or not (Public Law 100259 [S.557] March 22, 1988).

In the event SRTC distributes federal aid funds to a sub-recipient, SRTC will include Title VI language in all written agreements and will monitor for compliance. SRTC’s Title VI Coordinator is responsible for initiating and monitoring Title VI activities, preparing reports and other responsibilities as required by 23 Code of Federal Regulations (CFR) 200 and 49 Code of Federal Regulation 21.

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\_\_\_\_\_  
Executive Director Signature

\_\_\_\_\_  
Date

**Authorities:**

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall, on the grounds of race, color, national origin, age, creed, or sex, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance (refer to 23 CFR 200.9 and 49 CFR 21). The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of the terms “programs or activities” to include all programs or activities of federal aid recipients, sub-recipients, and contractors, whether such programs and activities are federally assisted or not (Public Law 100259 [S. 557] March 22, 1988).

Additional Authorities and Citations Include: Title VI of the Civil Rights Act of 1964, 42 USC 2000d to 2000-4; 42 USC 4601 to 4655; 23 United States Code 109(h); 23 United States Code 324; Department of Transportation Order 1050.2; Executive Order 12250; Executive Order 12898; 28 CFR 50.

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## **INTRODUCTION**

The Spokane Regional Transportation Council (SRTC) is designated the Regional Transportation Planning Organization (RTPO) at the state level and a Metropolitan Planning Organization (MPO) for Spokane County at the Federal level. MPOs ensure transportation expenditures are based on a continuing, cooperative and comprehensive planning process. RTPOs cover both urban *and* rural areas and receive state funding for planning activities.

Funds for transportation projects and programs are channeled through SRTC and awarded to local agencies and jurisdictions that deal with transportation. Additionally, as a regional intergovernmental agency, SRTC encourages communication, coordination and collaboration between planning and transportation departments at member agencies to assure connectivity throughout Spokane County. A signatory Interlocal Agreement between the following agencies shows SRTC's commitment to working together to provide each other, and the public, with quality transportation planning services:

- City of Spokane
- Spokane Valley
- Spokane County
- Washington State Department of Transportation (WSDOT) Eastern Region
- Spokane Transit Authority (STA)
- Spokane Airport Board
- Small cities and towns
- Washington State Transportation Commission

Participating Tribes include:

- Spokane Tribe of Indians
- Kalispel Tribe of Indians

## **Operational Guidelines**

Primary guidance to SRTC is provided by:

- The Metropolitan Planning Organization (MPO) Regulations 23 CFR 450.
- RCW 47.80 Regional Transportation Planning Organization (RTPO).
- SRTC's Interlocal Agreement
- Fixing America's Surface Transportation (FAST) Act (Pub. L. No. 114-94)
- State and Federal Clean Air Acts and Amendments
- Washington State Growth Management Act
- SRTC's Public Participation Plan
- SRTC's Procurement Process Policy
- Title 48, Chapter 1, Part 31 – Contract Cost Principles and Procedures
- Title 23, CFR 172 – Administration of Engineering and Design Related Service Contracts

- RCW 39.29 – Personal Service Contracts
- RCW 39.80 – Contracts for Architectural and Engineering Services
- Disadvantage Business Enterprises (DBE) Program
- SRTC Employee Handbook
- SRTC Affirmative Action Plan

## **ORGANIZATION**

### ***SRTC Policy Board***

SRTC is governed by a Policy Board consisting of 14 voting members and three ex officio non-voting members that meets monthly.

### ***Transportation Technical Committee***

The Transportation Technical Committee (TTC) is made up of 22 professionals from local jurisdictions. It meets monthly to review SRTC activities, coordinate projects, provide input on projects, and conduct technical reviews of work programs and transportation studies.

### ***Transportation Advisory Committee***

The Transportation Advisory Committee (TAC) provides transparency and a community perspective. It advises SRTC's Board of Directors on plans, programs and activities; makes recommendations on transportation policies; and other activities as directed by the Board. The TAC has 13 members who represent the general public and groups including, but not limited to, people with disabilities, senior citizens, youth, the business and freight moving communities, traditional automobile users and advocates for non-motorized transportation or public transit.

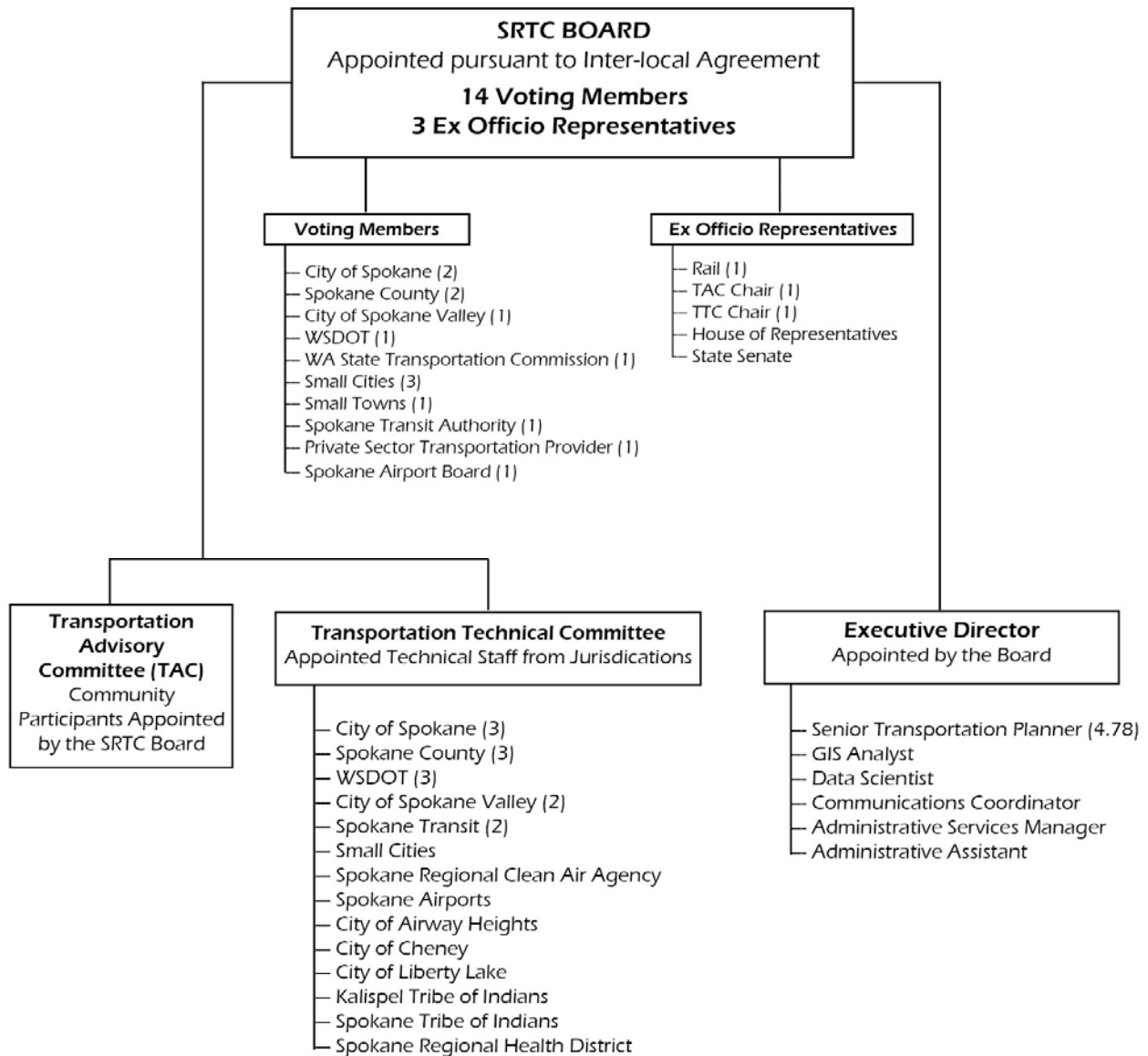
## **Staff**

SRTC's Executive Director is responsible for ensuring implementation of the Title VI program. The Title VI Coordinator is responsible for implementing, monitoring and ensuring SRTC's compliance with Title VI regulations. The Title VI Coordinator's responsibilities include:

- Preparing the annual Title VI Report update and submitting to WSDOT's Office of Equal Opportunity.
- Reviewing SRTC's Title VI program to assure compliance with Title VI regulations, that adequate resources are available to ensure compliance, and that the program is effective.
- Updating Title VI-related goals and objectives for the upcoming year.
- Collecting statistical data (race, color, sex and national origin) of participants in SRTC's programs and beneficiaries of them.
- Conducting Title VI reviews of program areas including planning, education and outreach, contracting and environmental affairs.
- Where applicable, including Title VI and related requirements in SRTC policies.

- Processing Title VI complaints using the agency's Nondiscrimination Complaint Procedures included in this document to resolve complaints.
- Assessing communications and public involvement strategies to ensure participation of impacted Title VI-protected groups was encouraged.

# Spokane Regional Transportation Council (SRTC) 2018 STRUCTURE



Updated December 2017

## GENERAL PROGRAM ADMINISTRATION

### Principles of SRTC's Communications & Public Participation Program

- Equal access is an essential part of the public involvement process.
- No major public policy decision is reached or large project implemented without significantly affecting someone.
- Professionals do not have a monopoly on good solutions.
- Even if a project or policy decision is sensible and beneficial, it must be arrived at properly to be acceptable.
- People are much more willing to live with a decision that affects different interests unequally if the decision-making process is open, objective, and considers all viewpoints.
- If project or policy staff doesn't provide all relevant information necessary for an informed decision, the public will rely on, and trust, others.
- Effective public notification and participation takes time and effort, but is important to sound decision-making.

## PUBLIC PARTICIPATION PLAN

SRTC's Public Participation Plan (PPP) guides the agency's communications and public participation program and outlines tools and resources used to engage the public. In accordance with 23 CFR 450.316(a), it is SRTC's "process for providing citizens, affected public agencies, representatives of public transportation users, freight shippers, providers of freight transportation services, private providers of transportation, representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of the disabled, and other interested parties with reasonable opportunities to be involved in the metropolitan planning process."

SRTC's PPP can be found at [srtc.org/get-involved/public-involvement](http://srtc.org/get-involved/public-involvement).

Elements of SRTC's Communications & Public Participation Program include:

- **Website** – SRTC.org includes information on the agency's programs and publications; meeting times and dates; contact information; the Title VI Plan, complaint procedures and complaint form; and an agency blog.
- **Publications** – SRTC issues publications, reports, and maps and responds to and processes data requests. The information is used by jurisdictions throughout the region and can be accessed through the website or by contacting SRTC directly.
- **Press releases** – Press releases are routinely sent to regional media outlets, as well as community stakeholders and Title VI protected groups. All press releases include a Title VI Notice to the public and contact information to reach agency staff.
- **Public meetings** – SRTC hosts public meetings and open houses as needed to promote agency activities. All Board and advisory committee meetings are open to the public, with an



item on every meeting agenda for public comments.

- **Opportunities for public comment** – SRTC provides opportunity for public comment and works to find new ways to solicit comment and involve all segments of the population. Comments are accepted via phone, email, mail, social media, and in person at SRTC committee meetings or public events. Formal public comment periods are designated prior to adoption or approval of major documents including the Transportation Improvement Program (TIP) and the Metropolitan Transportation Plan (MTP). SRTC responds to all comments with how it will be reviewed and considered by staff and member agencies.
- **Access to Staff** – SRTC staff is accessible in person, by telephone, mail, or email. Contact information is on the agency website.
- **Email** – SRTC uses electronic mailing lists to inform the public of programs, public comment periods, meetings, and more. These lists include groups representing Title VI populations.
- **Mailings** - SRTC uses U.S. Postal Service direct mailings as needed to keep the public informed of agency programs, public comment periods, meetings, and publications.
- **Public meetings, hearings and events** – Trainings, workshops, open houses, and forums are held as needed. SRTC holds public hearings or meetings during major updates to the region’s Metropolitan Transportation Plan, the Transportation Improvement Program and other plans, studies or documents.

### **Strategies for Engaging Title VI Protected Groups and Individuals with Limited English Proficiency (LEP)**

SRTC considers the needs of people traditionally under-served by transportation systems (such as low income and minority populations). An Environmental Justice (EJ) demographic profile (included Appendix 2 to this document) was created using American Community Survey data to identify the number and locations of area minority, low income, elderly and limited English proficient populations.

Census data shows the Spokane area has a small population of Limited English Proficient residents. Spanish, Russian and other Slavic languages are spoken most often in area homes after English. SRTC concentrates LEP efforts primarily on these populations through:

- Translated flyers placed in areas frequented or inhabited by concentrations of Limited English Proficient populations;
- Electronic e-mailing lists targeted to these populations. They include contact information for EJ population members, Title VI community groups and businesses owned by minorities or targeted to meeting the needs of minority groups.
- Translated materials for meetings in areas where concentrations of Limited English Proficient populations reside;
- Contact with social service agencies that work with these populations to act as liaison; and
- Contact with Spanish and Russian language media outlets.

SRTC's Title VI Coordinator has "I Speak" cards in case a person with limited English proficiency approaches staff. The Coordinator will identify the language needed and seek translation help.

### **Strategies for Engaging Tribal Governments and Members**

Membership to SRTC is open to all federally designated Tribal Nations in the planning area. There are two federally recognized Native American tribal governments with trust lands in SRTC's planning area; the Spokane Tribe and Kalispel Tribe. Both have seats on the Transportation Technical Committee (TTC). Tribes include their projects in the regional Transportation Improvement Program (TIP) if:

- It is completely physically contained in SRTC's planning area;
- The project crosses into SRTC's planning area; or
- Is a transit capital project.

Tribal contacts receive SRTC meeting notices and Tribal publications receive SRTC news releases. SRTC also notifies tribes of opportunities to participate through direct outreach to tribal leaders and staff, a Tribal Contacts email distribution list, agenda packets and inclusion on stakeholder groups for subarea studies with tribal trust land in the vicinity. The Tribal Liaison in the Washington State Department of Transportation's (WSDOT's) Planning Office is also utilized as a point of contact.

### **Key Planning and Programming Activities**

SRTC is mandated by state and federal law to maintain the region's long-range Metropolitan Transportation Plan (MTP), and the Transportation Improvement Program (TIP), a program of projects to be completed in the coming four years. SRTC conducts and supports state and federal planning, compliance, and certification programs, which enable counties, cities, transit agencies and WSDOT to obtain state and federal funding. The agency provides forecasts of population, housing, and transportation trends that are the basis for addressing current issues and exploring future needs and options that could benefit the region. SRTC also serves as a center for the collection, analysis, and dissemination of Census information to residents and governments in the region.

SRTC's Interlocal Agreement establishes the agency's growth management, transportation, database and technical assistance responsibilities. The agreement highlights the following functions:

- Fulfill MPO responsibilities for Spokane County, develop a regional transportation plan, review and approve expenditures of federal transportation funds and identify transportation system development needs and financial strategies.
- Fulfill RTPO requirements prescribed by state law for Spokane County; ensure that regional transportation and land-use plans are integrated; and ensure that state, regional and local transportation plans are consistent.
- Forecast and monitor economic, demographic, and travel conditions in the region as the foundation for local and regional planning.

- Provide technical assistance to local, state and federal governments and business and community organizations.
- Provide a forum for the discussion of emerging regional transportation issues.

## Major Programs

- **Metropolitan Transportation Plan (MTP)** – Provides a long-range regional investment strategy for transit, roadway, freight, and goods mobility; and non-motorized transportation. Addresses how to finance transportation improvements.
- **Transportation Improvement Program (TIP)** – Includes all projects using federal funds, funds managed by SRTC and the state and all regionally significant projects.
- **Air Quality Analysis and Planning** – SRTC provides air quality modeling services to local jurisdictions using Environmental Protection Agency (EPA) approved models and procedures.
- **Policy, Plan and Project Review** – Ensure that local, regional, and state planning efforts are compatible and work with local governments, growth management groups, and state agencies in reviewing policies, plans and projects for consistency with state and regional planning goals.
- **Technical Services and Regional System Data** – Provide demographic, economic, travel and geographic data to member jurisdictions, other agencies, businesses and the public; assist in planning activities of member jurisdictions; collect, analyze, maintain, and improve data.
- **Communications and Information Services** - Develop and disseminate outreach materials on agency activities and services. Assist agency staff in reaching out to, involving, and meeting the needs of SRTC members, other agencies, businesses, community organizations and the public.

## CONTRACT PROCEDURES

SRTC contracts include language requiring contractors (subrecipients of federal funds) to comply with the provisions of 49 U.S.C. 5332, which prohibits discrimination on the basis of race, color, creed, national origin, sex, or age, and prohibits discrimination in employment or business opportunity. Title VI verbiage is included in all SRTC Requests for Proposals (RFP) and contracts.

When contracting for outside services, SRTC utilizes WSDOT guidelines and lists for determining Disadvantaged Business Enterprises (DBE) goals for each contract. SRTC reports on DBE participation in the annual Title VI report.

SRTC's Fiscal Officer is responsible for evaluating and monitoring compliance with Title VI requirements in some aspects of the agency's consultant contracts process. The Fiscal Officer will include Title VI language in contracts and Requests for Proposals (RFP) as described below:

- *Ensure Title VI text is included in all agency contracts.*
- *Notify contractors of the appropriate text to be included in any subcontracts.*

Review consultants for Title VI compliance as described below:

- *If a subrecipient is found to be not in compliance with Title VI, the Title VI Coordinator and Fiscal Officer will work with the subrecipient to resolve the deficiency status and write a remedial action if necessary, as described in the next section.*

In conducting reviews of subrecipients, if a subrecipient is found to not be compliant with Title VI, the Fiscal Officer and Title VI Coordinator will work with the subrecipient to resolve the identified issues.

If the issues cannot be resolved, SRTC will issue a notification of deficiency status and remedial action for the subrecipient, as agreed upon by SRTC and WSDOT, within a period not to exceed 90 calendar days. SRTC will seek the cooperation of the subrecipient in correcting deficiencies and provide technical assistance and guidance for the subrecipient to comply voluntarily. Subrecipients placed in a deficiency status will be given a reasonable time, not to exceed 90 calendar days after receipt of the deficiency letter and remedial action, to voluntarily correct deficiencies. If a subrecipient fails or refuses to comply with requirements within that time frame, SRTC will submit to WSDOT, FHWA, and FTA two copies of the case file and a recommendation that the subrecipient be found in noncompliance.

A follow-up review will be conducted within 180 calendar days of the initial review to ensure the subrecipient has complied with the Title VI Program requirements in correcting deficiencies. If the subrecipient refuses to comply, SRTC may, with WSDOT's, FHWA's, and FTA's concurrence, initiate sanctions per 49 CFR 21.

## **TITLE VI NOTICE TO THE PUBLIC**

The paragraph below is inserted in all significant publications that are distributed to the public, such as the Metropolitan Transportation Plan and Transportation Improvement Program. The version below is the preferred text but where space is limited, the abbreviated version will be used.

*The Spokane Regional Transportation Council hereby gives public notice that it is the policy of the agency to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, Executive Order 12898 on Environmental Justice, and related statutes and regulations in all programs and activities. Title VI requires that no person shall be, on the grounds of race, color, sex, or national origin, be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which SRTC receives federal financial assistance. Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with SRTC. Any such complaint must be in writing and filed with SRTC's Title VI Coordinator within one hundred eight (180) days following the date of the alleged discriminatory occurrence. For more information, or to obtain a Title VI Discrimination Complaint Form, please see our website at [http://www.srtc.org/title\\_vi\\_page.html](http://www.srtc.org/title_vi_page.html) or call (509) 343-6370.*

## **Abbreviated Title VI Notice to the Public**

*SRTC assures nondiscrimination in accordance with the Title VI of the Civil Rights Act of 1964, and Civil Rights Restoration Act of 1987 (P.O. 100.259) and the American with Disabilities Act. For more information, or to obtain a Title VI Complaint Form, see <http://www.srtc.org> or call (509) 343-6370.*

## **NONDISCRIMINATION COMPLAINT PROCEDURES**

These procedures apply to all complaints filed under Title VI of the Civil Rights Act of 1964 [including its Disadvantaged Business Enterprises (DBE) and Equal Employment Opportunity (EEO) components], Section 504 of the Rehabilitation Act of 1973, the Civil Rights Restoration Act of 1987, and the Americans with Disabilities Act of 1990, relating to any program or activity administered by SRTC or its subrecipients, consultants, and/or contractors. Intimidation or retaliation of any kind is prohibited by law.

These procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies, or to seek private counsel for complaints alleging discrimination. These procedures are part of an administrative process that does not provide for remedies that include punitive damages or compensatory remuneration for the complainant.

Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation between the affected parties and the Title VI Coordinator may be utilized for resolution, at any stage of the process. The Title VI Coordinator will make every effort to pursue a resolution to the complaint. Initial interviews with the complainant and the respondent will request information regarding specifically requested relief and settlement opportunities.

### **Procedures**

1. Any individual, group of individuals, or entity that believes they have been subjected to discrimination prohibited by Title VI nondiscrimination provisions may file a written complaint with SRTC's Title VI Coordinator or fill out the Title VI Discrimination Complaint form that follows. A formal complaint must be filed within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant. The complaint must meet the following requirements:

- a. Be in writing (or utilizing the Title VI Discrimination Complaint form) and signed by the complainant(s).
- b. Include the date of the alleged act of discrimination (date when the complainant(s) became aware of the alleged discrimination; or the date on which that conduct was discontinued or the latest instance of the conduct).
- c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complained-of incident.
- d. Allegations received by fax or e-mail will be acknowledged and processed, once the identity(ies) of the complainant(s) and the intent to proceed with the complaint have been

established. For this, the complainant is required to mail a signed, original copy of the fax or e-mail transmittal.

- e. Allegations received by telephone will be reduced to writing and provided to the complainant for confirmation or revision before processing. A complaint form will be forwarded to the complainant for him/her to complete, sign, and return to SRTC for processing.

2. Upon receipt of the complaint, the Title VI Coordinator will determine its jurisdiction, acceptability, and need for additional information, as well as investigate the merit of the complaint. In cases where the complaint is against one of SRTC's subrecipients of federal funds, SRTC will assume jurisdiction and will investigate and adjudicate the case. Complaints against SRTC will be referred to the Washington State Department of Transportation's (WSDOT) Office of Equal Opportunity (OEO), the Federal Highway Administration, or the Federal Transit Administration, as appropriate, for proper disposition pursuant to their procedures. In cases warranting intervention to ensure equity, these agencies may assume jurisdiction and complete or obtain services to review or investigate matters.

3. In order to be accepted, a complaint must meet the following criteria:

- a. Be filed within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant.
- b. The allegation(s) must involve a covered basis such as race, color, national origin, sex, disability, or retaliation.
- c. The allegation(s) must involve a program or activity of a federal aid recipient, subrecipient, or contractor, or, in the case of Americans with Disabilities Act (ADA) allegations, an entity open to the public.
- d. The complainant(s) must accept reasonable resolution based on SRTC's administrative authority (reasonability to be determined by SRTC).

4. A complaint may be dismissed for the following reasons:

- a. The complainant requests the withdrawal of the complaint.
- b. The complainant fails to respond to repeated requests for additional information needed to process the complaint.
- c. The complainant cannot be located after reasonable attempts.

5. Once SRTC or WSDOT decides to accept the complaint for investigation, the complainant and the respondent will be notified in writing of such determination within five calendar days. The complaint will receive a case number and will then be logged in SRTC's or WSDOT's records identifying its basis and alleged harm, and the race, color, national origin, and gender of the complainant.

6. In cases where SRTC assumes the investigation of the complaint, SRTC will provide the respondent the opportunity to respond to allegations in writing. The respondent will have 10 calendar days from the date of SRTC's written notification of acceptance of the complaint to furnish a response.

7. In cases where SRTC assumes the investigation of the complaint, within 40 calendar days of the acceptance of the complaint, SRTC's Investigator\* will prepare a report for review by the agency's Legal Counsel and Executive Director. The report will include a description of the incident, identification of persons interviewed, findings, and recommendations for disposition.

8. The report and its findings will be sent to SRTC's Legal Counsel for review. Counsel will review the report and associated documentation and provide input to the Investigator within 10 calendar days.

9. Any comments or recommendations from Legal Counsel will be reviewed by SRTC's Investigator. The Investigator will discuss the report and recommendations with the Executive Director within 10 calendar days. The report will be modified as needed and made final for its release.

10. SRTC's final investigative report and a copy of the complaint will be forwarded to WSDOT's OEO within 60 calendar days of the acceptance of the complaint. WSDOT's OEO will share the report with FHWA and FTA, Washington Division Offices, as part of its Annual Title VI Update and Accomplishment Report.

11. SRTC will notify the parties of its preliminary findings, which are subject to concurrence from WSDOT's OEO. WSDOT's OEO will issue the final decision to SRTC based on the report.

12. Once WSDOT's OEO issues its final decision, SRTC will notify all parties involved about such determination. WSDOT's final determination is not subject to an appeal.

13. WSDOT will also serve as the appealing forum to a complainant that is not satisfied with the outcome of an investigation conducted by SRTC. WSDOT will analyze the facts of the case and will issue its conclusion to the appellant according to their procedures.

\*This will generally be SRTC's Title VI Coordinator.

Insert Title VI complaint form here



## TITLE VI ASSURANCES

The Spokane Regional Transportation Council (hereinafter referred to as the “Recipient”), HEREBY AGREES THAT as a condition to receiving any federal financial assistance from the U.S. Department of Transportation, it will comply with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 USC 2000d—42 USC 2000d—4 (hereinafter referred to as the “Act”), and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary Part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the “Regulations”), and other pertinent directives, to the end that in accordance with the Act, Regulations, and other pertinent directives, no person in the United States shall, on the grounds of race, color, sex, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the Recipient receives federal financial assistance from the Department of Transportation, including the Federal Highway Administration, and HEREBY GIVES ASSURANCE THAT it will promptly take any measures necessary to effectuate this agreement. This Assurance is required by Subsection 21.7(a)(1) of the Regulations.

More specifically and without limiting the above general assurance, the Recipient hereby gives the following specific assurances to its Federal Aid Highway Program.

1. That the Recipient agrees that each “program” and each “facility”, as defined in Subsections 21.23(e) and 21.23(b) of the Regulations, will be (with regard to a “program”) conducted or will be (with regard to a “facility”) operated in compliance with all requirements imposed by, or pursuant to, the Regulations.
2. That the Recipient shall insert the following notification in all solicitations for bids for work or material subject to the Regulations made in connection with the Federal Aid Highway Program, and in adapted form in all proposals for negotiated agreements:

“The Spokane Regional Transportation Council, in accordance with Title VI of the Civil Rights Act of 1964 and 78 Stat. 252, 42 USC 2000d—42 and Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21: Nondiscrimination in Federally Assisted Programs of the Department of Transportation Issued Pursuant to Such Act, hereby notifies all bidders that it will affirmatively ensure that any contract entered pursuant to this advertisement will afford minority business enterprises full opportunity to submit bids in response to this invitation, and will not discriminate on the grounds of race, color, sex, or national origin in consideration for an award.”

3. That the Recipient shall insert the following clauses in every contract subject to the Act and the Regulations:

CIVIL RIGHTS. The Contractor shall comply with all applicable civil rights statutes and implementing regulations including, but not limited to:

**Equal Employment Opportunity.** The Contractor agrees to comply with, and assures compliance by each third party contractor at any tier, with all requirements of Title VII of the Civil Rights Act 1964, as amended, 42 U.S.C. 2000e, and 49 U.S.C. 5332 and any implementing requirements FTA may issue. These equal employment opportunity (EEO) requirements include, but are not limited to, the following:

*The Contractor agrees that it will not discriminate against any employee or applicant for employment because of race, color, creed, sex, disability, age, or national origin. The Contractor agrees to take affirmative action to ensure that applicants are employed and that employees are treated during employment, without regard to their race, color, creed, sex, disability, age, or national origin. Such action shall include, but not be limited to, employment, upgrading, demotion or transfer, recruitment or recruitment advertising, layoff or termination, rates of pay or other forms of compensation, and selection for training, including apprenticeship. The Contractor shall also comply with any implementing requirements USDOT may issue.*

*If the Contractor is required to submit and obtain Federal Government approval of its EEO program, that EEO program approved by the Federal Government is incorporated by reference and made part of this Agreement. Failure by the Contractor to carry out the terms of that EEO program shall be treated as a violation of this Agreement. Upon notification to the Contractor of its failure to carry out the approved EEO program, the Federal Government may impose such remedies as it considers appropriate, including termination of Federal financial assistance, or other measures that may affect the Contractors eligibility to obtain future Federal financial assistance for transportation projects.*

**Nondiscrimination.** The Contractor, with regard to the work performed during the contract, shall not discriminate on the grounds of race, color, sex, or national origin in the selection and retention of subcontractors, including procurement of materials and leases of equipment. The Contractor shall not participate either directly or indirectly in discrimination prohibited by Section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.

- Nondiscrimination in Federal Transit Programs. The Contractor agrees to comply, and assures compliance by each third party contractor at any tier, with the provisions of 49 U.S.C. 5332, which prohibits discrimination on the basis of race, color, creed, national origin, sex, or age, and prohibits discrimination in employment or business opportunity.
- Nondiscrimination – Title VI of the Civil Rights Act. The Contractor agrees to comply, and assures compliance by each third party contractor at any tier, with all requirements prohibiting discrimination on the basis of race, color, or national origin, pursuant to Title VI of the Civil Rights Act of 1964, as

amended, 42 U.S.C. 2000d; and USDOT regulations, “Nondiscrimination in Federally Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Right Act, “49 CFR Part 21, and any implementing requirements FTA may issue.

- Nondiscrimination on the Basis of Sex. The Contractor agrees to comply with Title IX of the Education Amendments of 1972, as amended, 20 U.S.C. 1681 et seq., with USDOT regulations “Nondiscrimination on the Basis of Sex in Education Programs or Activities Receiving Federal Financial Assistance, 49 CFR Part 25, and with any implementing directives that USDOT or FTA may promulgate, which prohibit discrimination on the basis of sex.
- Nondiscrimination on the Basis of Age. The Contractor agrees to comply with applicable requirements of the Age Discrimination Act of 1975, as amended, 42 U.S.C. 6101 et seq., and implementing regulations, which prohibits discrimination on the basis of age.
- Other Nondiscrimination Statutes. The Contractor agrees to comply with all applicable requirements of any other nondiscrimination statute(s) that may apply to the Project.

**Access Requirements for Persons with Disabilities.** The Contractor agrees to comply with the requirements of 49 U.S.C. 5301(d). The Contractor also agrees to comply with all applicable requirements of Section 504 of the Rehabilitation Act of 1973, as amended, 29 U.S.C. 794, which prohibit discrimination on the basis of handicap; with the Americans with Disabilities Act of 1990 (ADA), as amended, 42 U.S.C. 12101 et seq., which requires the provision of accessible facilities and services; and with the Federal regulations, including any amendments thereto following:

- A. USDOT regulations, “Nondiscrimination on the Basis of Handicap in Programs and Activities Receiving or Benefiting from Federal Financial Assistance,” 49 CFR Part 27;
- B. U.S. DOJ regulations, “Nondiscrimination on the Basis of Disability in State and Local Government Services,” 28 CFR Part 35;
- C. U.S. DOJ regulations, “Nondiscrimination on the Basis of Disability by Public Accommodations and in Commercial Facilities,” 28 CFR Part 36;
- D. U.S. GSA regulation, “Accommodations for the Physically Handicapped,” 41 CFR Subpart 101-19;
- E. U.S. Equal Employment Opportunity Commission, “Regulations to Implement the Equal Employment Provisions of the Americans with Disabilities Act,” 29 CFR Part 1630;
- F. Any other nondiscrimination statute(s) that may apply to the Project.

**Access to Services for Persons with Limited English Proficiency.** The Contractor agrees to comply with applicable Federal guidance issued in compliance with Executive Order No. 13166, “Improving Access to Services for Persons with Limited English Proficiency,” August 11, 2000.

**Drug or Alcohol Abuse. Confidentiality and Other Civil Rights Protections.** The Contractor agrees to comply with the confidentiality and other civil rights provisions of the Drug Abuse office and Treatment Act of 1972, Pub. L. 92-255, March 21, 1972, as amended; the Comprehensive Alcohol abuse and alcoholism Prevention, Treatment and Rehabilitation Act of 1970, Pub. L. 91-616, December 31, 1970,

as amended; and the Public Health Service Act of 1912, as amended, 42 U.S.C. 290dd-3, and any subsequent amendment to these acts.

**PARTICIPATION OF DISADVANTAGED BUSINESS ENTERPRISES.** The Contractor shall take the following measures to facilitate participation of disadvantaged business enterprises (DBE) in the Project: The Contractor agrees to comply with Section 1101(b) of TEA-21, 23 U.S.C. 101 note, and USDOT regulations, "Participation by Disadvantaged Business Enterprises in Department of Transportation Financial Assistance Programs," 49 CFR Part 26; and the Contractor agrees that it shall not discriminate on the basis of race, color, national origin, or sex in the award and performance of any third party contract, or subagreement supported with Federal assistance derived from the USDOT or in the administration of its DBE program or the requirements of 49 CFR Part 26. The Contractor agrees to take all necessary and reasonable steps under 49 CFR Part 26 to ensure nondiscrimination in the award and administration of all third party contracts and subagreements supported with Federal assistance derived from the USDOT. The Contractor DBE program, as required by 49 CFR Part 26 and approved by the USDOT, is incorporated by reference and made part of this Agreement. Implementation of the DBE program is a legal obligation, and failure to carry out its terms shall be treated as violation of this Agreement. Upon notification to the Contractor of its failure to implement its approved DBE program, the USDOT may impose sanctions as provided for under 49 CFR Part 26 and may, in appropriate cases, refer the matter for enforcement under 18 U.S.C.1001, and/or the Program Fraud Civil Remedies Act, 31 U.S.C. 3801 et seq.

#### ADDITIONAL AGREEMENTS

**Compliance with Regulations.** The Contractor shall comply with the Regulations relative to nondiscrimination in federally assisted programs of the Spokane Regional Transportation Council (hereinafter referred to as SRTC), Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this contract.

**Solicitations for Subcontracts, Including Procurement of Materials and Equipment.** In all solicitations either by competitive bidding or negotiations made by the Contractor for work to be performed under a subcontract, including procurement of materials or leases of equipment, each potential subcontractor or supplier shall be notified by the Contractor of the Contractor's obligations under this contract and the Regulations relative to nondiscrimination on the ground of race, color, sex, or national origin.

**Information and Reports.** The Contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the SRTC or the Federal Highway Administration to be pertinent to ascertain compliance with such Regulations, orders, and instructions. Where any information required of a contractor is in the exclusive possession of

another who fails or refuses to furnish this information, the Contractor shall so certify to the SRTC or the Federal Highway Administration as appropriate, and shall set forth what efforts it has made to obtain the information.

**Sanctions for Noncompliance.** In the event of the Contractor's noncompliance with the nondiscrimination provisions of this contract, the SRTC shall impose such contract sanctions as it or the Federal Highway Administration may determine to be appropriate, including, but not limited to:

- Withholding of payments to the Contractor under the contract until the Contractor complies; and/or
- Cancellation, termination, or suspension of the contract, in whole or in part.

**Incorporation of Provisions.** The Contractor shall include the provisions of paragraphs (1) through (5) in every subcontract, including procurement of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The Contractor shall take such action with respect to any subcontractor or procurement as the SRTC or the Federal Highway Administration may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, however, that in the event a Contractor becomes involved in, or is threatened with, litigation with a subcontractor or supplier as a result of such direction, the Contractor may request the SRTC enter into such litigation to protect the interests of the SRTC and, in addition, the Contractor may request the United States to enter into such litigation to protect the interests of the United States.

4. That this Assurance obligates the Recipient for the period during which federal financial assistance is extended to the program, or is in the form of personal property, or real property or interest therein or structures or improvements thereon, in which case the Assurance obligates the Recipient or any transferee for the longer of the following periods: (a) the period during which the property is used for a purpose for which the federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or (b) the period during which the Recipient retains ownership or possession of the property.

5. The Recipient shall provide for such methods of administration for the program, as are found by the State Secretary of Transportation or the official to whom s/he delegates specific authority, to give reasonable guarantee that it, other recipients, subgrantees, contractors, subcontractors, transferees, successors in interest, and other participants of federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the Regulations, and this Assurance.

6. The Recipient agrees that the United States has a right to seek judicial endorsement with regard to any matter arising under the Act, the Regulations, and this Assurance.

THIS ASSURANCE is given in consideration of, and for the purpose of obtaining, any and all federal grants, loans, contracts, property, discounts, or other federal financial assistance extended after the date hereof to the Recipient by the Department of Transportation under the Federal Aid Highway

Program and is binding on it, other recipients, subgrantees, contractors, subcontractors, transferees, successors in interest, and other participants in the Federal Aid Highway Program. The person or persons whose signatures appear below are authorized to sign this Assurance on behalf of the Recipient.

\_\_\_\_\_  
Signature on original \_\_\_\_\_  
Sabrina Minshall, Executive Director

\_\_\_\_\_  
Date

## **CONTACT INFORMATION**

For questions on SRTC's Title VI Plan or procedures, please call (509) 343-6370 or e-mail [contact.srtc@srtc.org](mailto:contact.srtc@srtc.org). For information on SRTC's work program or publications, including documents, data forecasting, maps, other information available for use, current public comment periods and meetings open to the public, go to [www.srtc.org](http://www.srtc.org) or call (509) 343-6370.

## Appendix 1

### LEP Plan



## LIMITED ENGLISH PROFICIENCY PLAN

**September 2017**  
**Title VI Coordinator: Eve Nelson**



## INTRODUCTION

This *Limited English Proficiency Plan* addresses the Spokane Regional Transportation Council's (SRTC's) responsibility, as a recipient of funds from the United States Department of Transportation (USDOT), to take reasonable steps to ensure that Limited English Proficient (LEP) persons have meaningful access to the agency's programs and activities.

This plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., which states that no person shall on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity that receives federal financial assistance.

Additionally, Executive Order 13166 indicates that differing treatment based upon a person's inability to speak, read, write, or understand English is a type of national origin discrimination.

## FOUR-FACTOR ANALYSIS

SRTC uses the following four-factor analysis to determine the extent of obligation and steps reasonable to take to ensure meaningful access to agency programs and activities by LEP persons:

### 1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of SRTC:

SRTC staff used data from the 2011-2015 American Community Survey to determine that 3.1% of Spokane County's population speaks English less than very well. Based on a 2016 countywide population of 492,530 residents, at that percentage, approximately 15,268 people in SRTC's planning area have limited English proficiency.

### 2. The frequency with which LEP individuals come in contact with SRTC services:

SRTC staff reviewed the frequency of contact with LEP persons through committee meetings, public outreach, public meetings and open houses. To date, no requests for interpreters or translators have been received.

### 3. The nature and importance of the program, activity, or service provided by SRTC to people's lives:

The success of SRTC's programs is dependent on having as many participants as possible involved in planning and decision-making processes. As transportation affects where people live, employment opportunities and overall quality of life, it is critical that all Spokane County residents have a voice in the development of their future transportation system. Crucial SRTC activities include updates to the Metropolitan Transportation Plan, *Horizon 2040*, and the Transportation Improvement Program.

### 4. The resources available to SRTC and costs:

SRTC is committed to providing translation services to those who request them and translating materials as needed. SRTC's annual budget includes funds for services including translation. Verbiage was added to SRTC's website in 2016 in Spanish saying that the Metropolitan Transportation Plan is available for translation as requested.

## LANGUAGE ASSISTANCE

SRTC makes language assistance available at no cost to Individuals. This assistance includes:

1. A bilingual staff member
2. Online translation- while online translation services such as Google Translate are not supported by FHWA and FTA officials that SRTC works with, they can be used on short notice when there is not time to arrange for an in-person or telephone translator
3. Translation of key documents
4. "I Speak" cards taken to meetings and open houses
5. User-friendly materials that are easy to understand such as infographics, visualizations and maps rather than written explanations
6. Notification of community groups and organizations that support LEP populations, as well as non-English media sources, when SRTC is notifying the community of opportunities for public comment or that new information is available.
7. SRTC's website, publications, newspaper ads, meeting agendas and news releases include a notification of the public's rights under Title VI and the availability of translation services.

## MONITORING

SRTC documents activities and requests in order to evaluate current processes. The Title VI and LEP plan are updated as required or needed.

## Appendix 2

### Demographic Profile of the Spokane Region

**Table 1: S1601: LANGUAGE SPOKEN AT HOME**  
**2012-2016 American Community Survey 5-Year Estimates**

Subject	Spokane County, Washington					
	Total		Percent of specified language speakers			
			Speak English "very well"		Speak English less than "very well"	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population 5 years and over	455,875	*****	97.0%	+/-0.3	3.0%	+/-0.3
Speak only English	421,669	+/-1,930	(X)	(X)	(X)	(X)
Speak a language other than English	34,206	+/-1,930	60.4%	+/-2.3	39.6%	+/-2.3
<b>SPEAK A LANGUAGE OTHER THAN ENGLISH</b>						
Spanish	10,589	+/-930	71.9%	+/-3.7	28.1%	+/-3.7
5 to 17 years old	1,595	+/-374	87.5%	+/-5.8	12.5%	+/-5.8
18 to 64 years old	7,943	+/-672	69.4%	+/-4.9	30.6%	+/-4.9
65 years old and over	1,051	+/-203	66.8%	+/-9.5	33.2%	+/-9.5
Other Indo-European languages	14,323	+/-1,715	58.9%	+/-4.6	41.1%	+/-4.6
5 to 17 years old	2,840	+/-644	74.1%	+/-7.3	25.9%	+/-7.3
18 to 64 years old	9,629	+/-1,124	55.8%	+/-5.4	44.2%	+/-5.4
65 years old and over	1,854	+/-281	52.2%	+/-8.8	47.8%	+/-8.8
Asian and Pacific Island languages	7,457	+/-535	47.6%	+/-3.3	52.4%	+/-3.3
5 to 17 years old	1,282	+/-246	71.4%	+/-8.0	28.6%	+/-8.0
18 to 64 years old	5,401	+/-435	46.6%	+/-4.3	53.4%	+/-4.3
65 years old and over	774	+/-148	15.5%	+/-7.3	84.5%	+/-7.3
Other languages	1,837	+/-409	57.0%	+/-13.0	43.0%	+/-13.0
5 to 17 years old	212	+/-112	69.3%	+/-26.7	30.7%	+/-26.7
18 to 64 years old	1,515	+/-391	55.8%	+/-14.0	44.2%	+/-14.0
65 years old and over	110	+/-74	50.0%	+/-37.7	50.0%	+/-37.7
<b>CITIZENS 18 YEARS AND OVER</b>						
All citizens 18 years old and over	364,862	+/-837	98.4%	+/-0.2	1.6%	+/-0.2
Speak only English	346,173	+/-1,446	(X)	(X)	(X)	(X)
Speak a language other than English	18,689	+/-1,252	68.6%	+/-2.7	31.4%	+/-2.7
Spanish	6,461	+/-676	83.8%	+/-3.2	16.2%	+/-3.2
Other languages	12,228	+/-1,030	60.6%	+/-3.6	39.4%	+/-3.6

Source: U.S. Census Bureau, 2012-2016 American Community Survey 5-Year Estimates - Table S1601

**Table 2: B16001: LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS**

Universe: Population 5 years and over  
2011-2015 American Community Survey 5-Year Estimates

Subject	Spokane County, Washington	
	Estimate	Margin of Error
Total:	451,005	*****
Speak only English	415,680	+/-1,895
Spanish or Spanish Creole:	9,807	+/-863
Speak English "very well"	7,177	+/-748
Speak English less than "very well"	2,630	+/-338
French (incl. Patois, Cajun):	1,006	+/-224
Speak English "very well"	820	+/-180
Speak English less than "very well"	186	+/-96
French Creole:	19	+/-23
Speak English "very well"	11	+/-20
Speak English less than "very well"	8	+/-12
Italian:	727	+/-362
Speak English "very well"	673	+/-363
Speak English less than "very well"	54	+/-35
Portuguese or Portuguese Creole:	96	+/-58
Speak English "very well"	50	+/-41
Speak English less than "very well"	46	+/-47
German:	1,701	+/-314
Speak English "very well"	1,425	+/-269
Speak English less than "very well"	276	+/-112
Yiddish:	9	+/-14
Speak English "very well"	9	+/-14
Speak English less than "very well"	0	+/-28
Other West Germanic languages:	238	+/-170
Speak English "very well"	230	+/-169
Speak English less than "very well"	8	+/-12
Scandinavian languages:	180	+/-85
Speak English "very well"	153	+/-75
Speak English less than "very well"	27	+/-43
Greek:	49	+/-39
Speak English "very well"	49	+/-39
Speak English less than "very well"	0	+/-28
Russian:	7,683	+/-1,133
Speak English "very well"	3,913	+/-753
Speak English less than "very well"	3,770	+/-645
Polish:	107	+/-73
Speak English "very well"	96	+/-67
Speak English less than "very well"	11	+/-17
Serbo-Croatian:	598	+/-415
Speak English "very well"	373	+/-224
Speak English less than "very well"	225	+/-219
Other Slavic languages:	2,024	+/-598
Speak English "very well"	1,011	+/-372
Speak English less than "very well"	1,013	+/-388
Armenian:	0	+/-28
Speak English "very well"	0	+/-28

Speak English less than "very well"	0	+/-28
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**Table 2:** B16001: LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS (Cont.)

Universe: Population 5 years and over  
Source: 2011-2015 American Community Survey 5-Year Estimates

	Spokane County, Washington	
	Estimate	Margin of Error
Persian:	137	+/-148
Speak English "very well"	35	+/-31
Speak English less than "very well"	102	+/-145
Gujarati:	0	+/-28
Speak English "very well"	0	+/-28
Speak English less than "very well"	0	+/-28
Hindi:	243	+/-236
Speak English "very well"	228	+/-233
Speak English less than "very well"	15	+/-21
Urdu:	172	+/-172
Speak English "very well"	149	+/-146
Speak English less than "very well"	23	+/-33
Other Indic languages:	369	+/-194
Speak English "very well"	111	+/-71
Speak English less than "very well"	258	+/-179
Other Indo-European languages:	697	+/-498
Speak English "very well"	494	+/-377
Speak English less than "very well"	203	+/-161
Chinese:	1,163	+/-271
Speak English "very well"	492	+/-139
Speak English less than "very well"	671	+/-203
Japanese:	618	+/-176
Speak English "very well"	438	+/-145
Speak English less than "very well"	180	+/-81
Korean:	731	+/-260
Speak English "very well"	285	+/-122
Speak English less than "very well"	446	+/-190
Mon-Khmer, Cambodian:	354	+/-184
Speak English "very well"	215	+/-126
Speak English less than "very well"	139	+/-74
Hmong:	227	+/-133
Speak English "very well"	173	+/-117
Speak English less than "very well"	54	+/-47
Thai:	147	+/-93
Speak English "very well"	73	+/-57
Speak English less than "very well"	74	+/-51
Laotian:	143	+/-126
Speak English "very well"	143	+/-126
Speak English less than "very well"	0	+/-28
Vietnamese:	2,005	+/-440
Speak English "very well"	710	+/-210
Speak English less than "very well"	1,295	+/-290
Other Asian languages:	141	+/-99

Speak English "very well"	53	+/-60
Speak English less than "very well"	88	+/-76
Tagalog:	848	+/-224
Speak English "very well"	413	+/-134
Speak English less than "very well"	435	+/-139

**Table 2:** B16001: LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS (Cont.)

Universe: Population 5 years and over

Source: 2011-2015 American Community Survey 5-Year Estimates

	<b>Spokane County, Washington</b>	
	<b>Estimate</b>	<b>Margin of Error</b>
Other Pacific Island languages:	1,208	+/-350
Speak English "very well"	459	+/-202
Speak English less than "very well"	749	+/-260
Navajo:	0	+/-28
Speak English "very well"	0	+/-28
Speak English less than "very well"	0	+/-28
Other Native North American languages:	218	+/-125
Speak English "very well"	199	+/-125
Speak English less than "very well"	19	+/-19
Hungarian:	131	+/-95
Speak English "very well"	116	+/-93
Speak English less than "very well"	15	+/-17
Arabic:	871	+/-382
Speak English "very well"	409	+/-226
Speak English less than "very well"	462	+/-252
Hebrew:	49	+/-42
Speak English "very well"	39	+/-38
Speak English less than "very well"	10	+/-17
African languages:	593	+/-283
Speak English "very well"	188	+/-107
Speak English less than "very well"	405	+/-243
Other and unspecified languages:	16	+/-24
Speak English "very well"	16	+/-24
Speak English less than "very well"	0	+/-28

Source: U.S. Census Bureau, 2012-2016 American Community Survey 5-Year Estimates - Table S16001

**Table 3: S1810: DISABILITY CHARACTERISTICS**  
2012-2016 American Community Survey 5 -Year Estimates

Subject	Spokane County, Washington					
	Total		With a disability		Percent with a disability	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Total civilian noninstitutionalized population	476,871	+/-614	71,410	+/-2,015	15.0%	+/-0.4
<b>SEX</b>						
Male	233,497	+/-533	35,209	+/-1,335	15.1%	+/-0.6
Female	243,374	+/-270	36,201	+/-1,243	14.9%	+/-0.5
<b>AGE</b>						
Population under 5 years	29,981	+/-8	216	+/-107	0.7%	+/-0.4
With a hearing difficulty	(X)	(X)	85	+/-68	0.3%	+/-0.2
With a vision difficulty	(X)	(X)	131	+/-82	0.4%	+/-0.3
Population 5 to 17 years	78,887	+/-95	5,174	+/-583	6.6%	+/-0.7
With a hearing difficulty	(X)	(X)	594	+/-186	0.8%	+/-0.2
With a vision difficulty	(X)	(X)	628	+/-169	0.8%	+/-0.2
With a cognitive difficulty	(X)	(X)	4,068	+/-512	5.2%	+/-0.6
With an ambulatory difficulty	(X)	(X)	641	+/-207	0.8%	+/-0.3
With a self-care difficulty	(X)	(X)	904	+/-234	1.1%	+/-0.3
Population 18 to 34 years	115,646	+/-377	9,235	+/-720	8.0%	+/-0.6
With a hearing difficulty	(X)	(X)	1,441	+/-347	1.2%	+/-0.3
With a vision difficulty	(X)	(X)	1,497	+/-301	1.3%	+/-0.3
With a cognitive difficulty	(X)	(X)	6,091	+/-578	5.3%	+/-0.5
With an ambulatory difficulty	(X)	(X)	1,929	+/-361	1.7%	+/-0.3
With a self-care difficulty	(X)	(X)	1,011	+/-237	0.9%	+/-0.2
With an independent living difficulty	(X)	(X)	3,468	+/-446	3.0%	+/-0.4
Population 35 to 64 years	182,428	+/-311	30,028	+/-1,417	16.5%	+/-0.8
With a hearing difficulty	(X)	(X)	6,874	+/-613	3.8%	+/-0.3
With a vision difficulty	(X)	(X)	4,104	+/-442	2.2%	+/-0.2
With a cognitive difficulty	(X)	(X)	12,463	+/-955	6.8%	+/-0.5
With an ambulatory difficulty	(X)	(X)	16,339	+/-979	9.0%	+/-0.5
With a self-care difficulty	(X)	(X)	5,433	+/-535	3.0%	+/-0.3
With an independent living difficulty	(X)	(X)	10,000	+/-711	5.5%	+/-0.4
Population 65 to 74 years	41,241	+/-189	11,208	+/-593	27.2%	+/-1.4
With a hearing difficulty	(X)	(X)	5,230	+/-405	12.7%	+/-1.0
With a vision difficulty	(X)	(X)	1,588	+/-292	3.9%	+/-0.7
With a cognitive difficulty	(X)	(X)	2,413	+/-352	5.9%	+/-0.9
With an ambulatory difficulty	(X)	(X)	6,476	+/-565	15.7%	+/-1.4
With a self-care difficulty	(X)	(X)	1,684	+/-275	4.1%	+/-0.7
With an independent living difficulty	(X)	(X)	2,853	+/-352	6.9%	+/-0.8
75 years and over	28,688	+/-272	15,549	+/-543	54.2%	+/-1.8
With a hearing difficulty	(X)	(X)	7,476	+/-493	26.1%	+/-1.7
With a vision difficulty	(X)	(X)	2,990	+/-359	10.4%	+/-1.2
With a cognitive difficulty	(X)	(X)	4,542	+/-469	15.8%	+/-1.6
With an ambulatory difficulty	(X)	(X)	9,947	+/-516	34.7%	+/-1.7
With a self-care difficulty	(X)	(X)	4,149	+/-417	14.5%	+/-1.4
With an independent living difficulty	(X)	(X)	7,673	+/-548	26.7%	+/-1.9

Source: 2016 American Community Survey 1-Year Estimates - Table C1810

**Table 3: S1810: DISABILITY CHARACTERISTICS (Cont.)**

2012-2016 American Community Survey 5-Year Estimate

Subject	Spokane County, Washington					
	Total		With a disability		Percent with a disability	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
RACE AND HISPANIC OR LATINO ORIGIN						
White alone	424,613	+/-1,030	64,482	+/-1,825	15.2%	+/-0.4
Black or African American alone	8,023	+/-523	1,040	+/-226	13.0%	+/-2.8
American Indian and Alaska Native alone	6,190	+/-660	1,273	+/-241	20.6%	+/-4.1
Asian alone	11,210	+/-567	1,071	+/-221	9.6%	+/-1.9
Native Hawaiian and Other Pacific Islander alone	2,171	+/-222	172	+/-91	7.9%	+/-4.1
Some other race alone	5,517	+/-757	618	+/-223	11.2%	+/-3.9
Two or more races	19,147	+/-1,004	2,754	+/-438	14.4%	+/-2.1
White alone, not Hispanic or Latino	409,373	+/-531	62,814	+/-1,780	15.3%	+/-0.4
Hispanic or Latino (of any race)	24,337	+/-143	2,829	+/-390	11.6%	+/-1.6

Source: 2016 American Community Survey 1-Year Estimates - Table C1810

**Table 4: C18101 SEX BY AGE BY DISABILITY STATUS**

Universe: Civilian noninstitutionalized population

2012-2016 American Community Survey 5-Year Estimates

Subject	Spokane County, Washington	
	Estimate	Margin of Error
Total:	489,979	+/-1,590
Male:	240,794	+/-1,905
Under 18 years:	57,418	+/-990
With a disability	3,235	+/-967
No disability	54,183	+/-1,351
18 to 64 years:	149,404	+/-1,592
With a disability	18,533	+/-2,203
No disability	130,871	+/-2,831
65 years and over:	33,972	+/-483
With a disability	12,920	+/-1,350
No disability	21,052	+/-1,350
Female:	249,185	+/-1,229
Under 18 years:	53,230	+/-1,010
With a disability	2,563	+/-947
No disability	50,667	+/-1,281
18 to 64 years:	154,695	+/-541
With a disability	20,009	+/-2,288
No disability	134,686	+/-2,346
65 years and over:	41,260	+/-601
With a disability	15,175	+/-1,427
No disability	26,085	+/-1,408

Source: 2016 American Community Survey 1-Year Estimates - Table C18101



**Table 5: DP05: ACS DEMOGRAPHIC AND HOUSING ESTIMATES**  
 2012-2016 American Community Survey 5-Year Estimates

Subject	Spokane County, Washington			
	Estimate	Margin of Error	Percent	Percent Margin of Error
<b>RACE</b>				
Total population	485,859	*****	485,859	(X)
One race	466,135	+/-1,011	95.9%	+/-0.2
Two or more races	19,724	+/-1,011	4.1%	+/-0.2
One race	466,135	+/-1,011	95.9%	+/-0.2
White	431,646	+/-944	88.8%	+/-0.2
Black or African American	8,754	+/-523	1.8%	+/-0.1
American Indian and Alaska Native	6,487	+/-650	1.3%	+/-0.1
Cherokee tribal grouping	371	+/-224	0.1%	+/-0.1
Chippewa tribal grouping	272	+/-136	0.1%	+/-0.1
Navajo tribal grouping	81	+/-63	0.0%	+/-0.1
Sioux tribal grouping	428	+/-236	0.1%	+/-0.1
Asian	11,327	+/-556	2.3%	+/-0.1
Asian Indian	906	+/-260	0.2%	+/-0.1
Chinese	1,939	+/-388	0.4%	+/-0.1
Filipino	1,971	+/-401	0.4%	+/-0.1
Japanese	1,247	+/-306	0.3%	+/-0.1
Korean	920	+/-228	0.2%	+/-0.1
Vietnamese	2,185	+/-441	0.4%	+/-0.1
Other Asian	2,159	+/-514	0.4%	+/-0.1
Native Hawaiian and Other Pacific Islander	2,171	+/-222	0.4%	+/-0.1
Native Hawaiian	365	+/-202	0.1%	+/-0.1
Guamanian or Chamorro	337	+/-208	0.1%	+/-0.1
Samoan	314	+/-174	0.1%	+/-0.1
Other Pacific Islander	1,155	+/-303	0.2%	+/-0.1
Some other race	5,750	+/-793	1.2%	+/-0.2
Two or more races	19,724	+/-1,011	4.1%	+/-0.2
White and Black or African American	4,280	+/-571	0.9%	+/-0.1
White and American Indian and Alaska Native	6,118	+/-599	1.3%	+/-0.1
White and Asian	3,967	+/-428	0.8%	+/-0.1
Black or African American and American Indian and Alaska Native	290	+/-135	0.1%	+/-0.1

Source: 2016 American Community Survey 1-Year Estimates – Table DP05

**Table 6: S1901: INCOME IN THE PAST 12 MONTHS (IN 2016 INFLATION-ADJUSTED DOLLARS)**  
2012-2016 American Community Survey 5-Year Estimates

Subject	United States		Washington		Spokane County, Washington	
	Households		Households		Households	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Total	117,716,237	+/-222,078	2,696,606	+/-6,024	191,222	+/-1,144
Less than \$10,000	7.0%	+/-0.1	5.9%	+/-0.1	7.7%	+/-0.4
\$10,000 to \$14,999	5.1%	+/-0.1	4.0%	+/-0.1	5.3%	+/-0.4
\$15,000 to \$24,999	10.2%	+/-0.1	8.4%	+/-0.1	11.0%	+/-0.5
\$25,000 to \$34,999	9.9%	+/-0.1	8.7%	+/-0.1	11.2%	+/-0.5
\$35,000 to \$49,999	13.2%	+/-0.1	12.7%	+/-0.1	14.3%	+/-0.6
\$50,000 to \$74,999	17.8%	+/-0.1	18.4%	+/-0.2	19.1%	+/-0.5
\$75,000 to \$99,999	12.2%	+/-0.1	13.4%	+/-0.1	12.6%	+/-0.5
\$100,000 to \$149,999	13.5%	+/-0.1	15.6%	+/-0.2	11.8%	+/-0.4
\$150,000 to \$199,999	5.4%	+/-0.1	6.5%	+/-0.1	4.1%	+/-0.3
\$200,000 or more	5.7%	+/-0.1	6.3%	+/-0.1	3.0%	+/-0.2
Median income (dollars)	55,322	+/-120	62,848	+/-343	50,550	+/-687
Mean income (dollars)	77,866	+/-146	84,022	+/-376	66,310	+/-1,115
<b>PERCENT ALLOCATED</b>						
Household income in the past 12 months	32.4%	(X)	27.3%	(X)	28.5%	(X)
Family income in the past 12 months	(X)	(X)	(X)	(X)	(X)	(X)
Nonfamily income in the past 12 months	(X)	(X)	(X)	(X)	(X)	(X)

Source: U.S. Census Bureau, 2012-2016 American Community Survey 5-Year Estimates – Table S1901

**Table 7: DP04: SELECTED HOUSING CHARACTERISTICS**  
2012-2016 American Community Survey 5-Year Estimates

Subject	Spokane County, Washington			
	Estimate	Margin of Error	Percent	Percent Margin of Error
<b>HOUSING OCCUPANCY</b>				
Total housing units	207,008	+/-340	207,008	(X)
Occupied housing units	191,222	+/-1,144	92.4%	+/-0.5
Vacant housing units	15,786	+/-1,058	7.6%	+/-0.5
<b>VEHICLES AVAILABLE</b>				
Occupied housing units	191,222	+/-1,144	191,222	(X)
No vehicles available	14,383	+/-652	7.5%	+/-0.3
1 vehicle available	59,157	+/-1,262	30.9%	+/-0.6
2 vehicles available	72,358	+/-1,514	37.8%	+/-0.7
3 or more vehicles available	45,324	+/-1,078	23.7%	+/-0.6

Source: U.S. Census Bureau, 2012-2016 American Community Survey 5-Year Estimates – Table DP04

**Table 8: S1703: SELECTED CHARACTERISTICS OF PEOPLE AT SPECIFIED LEVELS OF POVERTY IN THE PAST 12 MONTHS**

2012-2016 American Community Survey 5-Year Estimates

Subject	Spokane County, Washington			
	Total		Less than 100 percent of the poverty level	
	Estimate	Margin of Error	Estimate	Margin of Error
Population for whom poverty status is determined	470,883	+/-851	15.6%	+/-0.8
<b>SEX</b>				
Male	231,608	+/-597	15.4%	+/-0.9
Female	239,275	+/-486	15.8%	+/-0.8
<b>AGE</b>				
Under 18 years	106,928	+/-449	19.2%	+/-1.6
Related children of householder under 18 years	106,230	+/-505	18.7%	+/-1.6
18 to 64 years	294,026	+/-587	16.0%	+/-0.7
65 years and over	69,929	+/-334	8.2%	+/-0.9
<b>RACE AND HISPANIC OR LATINO ORIGIN</b>				
One race	452,181	+/-1,341	15.2%	+/-0.7
White	419,714	+/-1,228	14.4%	+/-0.7
Black or African American	7,958	+/-528	29.6%	+/-5.7
American Indian and Alaska Native	6,124	+/-656	31.6%	+/-6.7
Asian	10,798	+/-557	15.9%	+/-3.7
Native Hawaiian and Other Pacific Islander	2,142	+/-225	32.0%	+/-16.1
Some other race	5,445	+/-741	27.5%	+/-7.0
Two or more races	18,702	+/-992	25.0%	+/-3.6
Hispanic or Latino origin (of any race)	23,851	+/-213	25.4%	+/-3.3
White alone, not Hispanic or Latino	404,886	+/-752	14.0%	+/-0.7
<b>LIVING ARRANGEMENT</b>				
In family households	375,231	+/-2,435	12.0%	+/-0.8
In married-couple family	284,092	+/-4,097	6.6%	+/-0.9
In Female householder, no husband present households	65,154	+/-3,014	31.2%	+/-2.3
In other living arrangements	95,652	+/-2,299	29.6%	+/-1.1
<b>EDUCATIONAL ATTAINMENT</b>				
Population 25 years and over	320,431	+/-515	12.2%	+/-0.6
Less than high school graduate	21,671	+/-1,040	27.5%	+/-2.7
High school graduate (includes equivalency)	79,817	+/-1,683	15.8%	+/-1.1
Some college or associate's degree	125,707	+/-1,812	12.5%	+/-0.7
Bachelor's degree or higher	93,236	+/-1,931	5.1%	+/-0.6

Source: 2016 American Community Survey 1-Year Estimates - Table S1703

**Table 8: S1703: SELECTED CHARACTERISTICS OF PEOPLE AT SPECIFIED LEVELS OF POVERTY IN THE PAST 12 MONTHS (Cont,)**

2012-2016 American Community Survey 5-Year Estimates

Subject	Spokane County, Washington			
	Total		Less than 100 percent of the poverty level	
	Estimate	Margin of Error	Estimate	Margin of Error
<b>NATIVITY AND CITIZENSHIP STATUS</b>				
Native	444,860	+/-1,447	15.4%	+/-0.7
Foreign born	26,023	+/-1,321	18.9%	+/-2.4
Naturalized citizen	13,345	+/-899	14.3%	+/-2.3
<b>DISABILITY STATUS</b>				
With any disability	70,865	+/-2,033	23.4%	+/-1.3
No disability	397,980	+/-2,199	14.3%	+/-0.8
<b>WORK STATUS</b>				
Population 16 to 64 years	305,694	+/-798	16.0%	+/-0.7
Worked full-time, year-round	139,060	+/-1,998	2.4%	+/-0.3
Worked less than full-time, year-round	90,138	+/-1,783	22.4%	+/-1.3
Did not work	76,496	+/-1,649	33.1%	+/-1.4

Source: U.S. Census Bureau, 2012-2016 American Community Survey 5-Year Estimates – Table S1703

**Table 9: S1701: POVERTY STATUS IN THE PAST 12 MONTHS**

2012-2016 American Community Survey 5-Year Estimates

Subject	Spokane County, Washington					
	Total		Below poverty level		Percent below poverty level	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population for whom poverty status is determined	470,883	+/-851	73,462	+/-3,560	15.6%	+/-0.8

Source: 2016 American Community Survey 1-Year Estimates - Table S1703

**Table 10: S1901/S1902: INCOME IN THE PAST 12 MONTHS (IN 2016 INFLATION-ADJUSTED DOLLARS)**

2012-2016 American Community Survey 5-Year Estimates

Subject	United States		Washington		Spokane County, Washington	
	Households		Households		Households	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Median income (dollars)	55,322	+/-120	62,848	+/-343	50,550	+/-687
Per Capita income (Dollars)	29,829	+/-82	32,999	+/-152	26,860	+/-445

Source: U.S. Census Bureau, 2012-2016 American Community Survey 5-Year Estimates

**Table 11: S0101: AGE AND SEX**  
2012-2016 American Community Survey 5-Year Estimates

Subject	Spokane County, Washington					
	Total		Male		Female	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Total population	485,859	*****	240,656	+/-86	245,203	+/-86
<b>AGE</b>						
Under 5 years	6.2%	*****	6.4%	+/-0.1	5.9%	+/-0.1
5 to 9 years	6.2%	+/-0.2	6.5%	+/-0.3	5.9%	+/-0.2
10 to 14 years	6.3%	+/-0.2	6.5%	+/-0.3	6.1%	+/-0.2
15 to 19 years	6.5%	+/-0.1	6.7%	+/-0.1	6.3%	+/-0.1
20 to 24 years	7.7%	+/-0.1	7.9%	+/-0.1	7.5%	+/-0.1
25 to 29 years	7.6%	+/-0.1	7.8%	+/-0.1	7.4%	+/-0.1
30 to 34 years	6.7%	+/-0.1	6.9%	+/-0.1	6.5%	+/-0.1
35 to 39 years	6.0%	+/-0.2	6.4%	+/-0.3	5.6%	+/-0.3
40 to 44 years	5.9%	+/-0.2	5.8%	+/-0.3	6.0%	+/-0.3
45 to 49 years	6.1%	+/-0.1	6.2%	+/-0.1	6.1%	+/-0.1
50 to 54 years	6.9%	+/-0.1	6.8%	+/-0.1	7.0%	+/-0.1
55 to 59 years	6.8%	+/-0.2	6.6%	+/-0.2	7.0%	+/-0.2
60 to 64 years	6.4%	+/-0.2	6.3%	+/-0.2	6.5%	+/-0.2
65 to 69 years	5.1%	+/-0.1	4.8%	+/-0.2	5.3%	+/-0.2
70 to 74 years	3.5%	+/-0.1	3.4%	+/-0.2	3.6%	+/-0.2
75 to 79 years	2.4%	+/-0.1	2.0%	+/-0.1	2.7%	+/-0.2
80 to 84 years	1.9%	+/-0.1	1.6%	+/-0.1	2.2%	+/-0.2
85 years and over	1.9%	+/-0.1	1.4%	+/-0.1	2.3%	+/-0.2
<b>SELECTED AGE CATEGORIES</b>						
5 to 14 years	12.5%	*****	13.0%	+/-0.1	12.0%	+/-0.1
15 to 17 years	3.8%	*****	3.9%	+/-0.1	3.7%	+/-0.1
18 to 24 years	10.4%	+/-0.1	10.6%	+/-0.1	10.1%	+/-0.1
15 to 44 years	40.4%	+/-0.1	41.4%	+/-0.1	39.3%	+/-0.1
16 years and over	80.0%	+/-0.1	79.2%	+/-0.1	80.7%	+/-0.1
18 years and over	77.5%	*****	76.7%	+/-0.1	78.4%	+/-0.1
60 years and over	21.1%	+/-0.2	19.6%	+/-0.2	22.6%	+/-0.2
62 years and over	18.5%	+/-0.2	17.1%	+/-0.2	19.9%	+/-0.2
65 years and over	14.7%	+/-0.1	13.3%	+/-0.1	16.1%	+/-0.1
75 years and over	6.1%	+/-0.1	5.0%	+/-0.1	7.2%	+/-0.1
<b>SUMMARY INDICATORS</b>						
Median age (years)	37.3	+/-0.1	35.9	+/-0.1	38.9	+/-0.3
Sex ratio (males per 100 females)	98.1	+/-0.1	(X)	(X)	(X)	(X)
Age dependency ratio	59.2	+/-0.1	(X)	(X)	(X)	(X)
Old-age dependency ratio	23.4	+/-0.1	(X)	(X)	(X)	(X)
Child dependency ratio	35.7	+/-0.1	(X)	(X)	(X)	(X)
<b>PERCENT ALLOCATED</b>						
Sex	0.1%	(X)	(X)	(X)	(X)	(X)
Age	1.4%	(X)	(X)	(X)	(X)	(X)

Source: U.S. Census Bureau, 2012-2016 American Community Survey 5-Year Estimates – Table S0101

## Appendix 3

Title VI 101 Information Sheet  
prepared by Janet Sharp, WSDOT Office of Equal Employment

## Appendix 4

### Public Comments Received During Comment Period