

2022 The Arc of Spokane Title VI Program

Introduction

The Arc of Spokane (The Arc) is a Federal Transit Administration (FTA) Sub-recipient to Spokane Transit Authority (STA). STA will oversee The Arc of Spokane in carrying out transportation services to its constituents and stakeholders via use and maintenance of ADA-compliant vehicles provided through FTA Section 5310 award of capital and operational projects.

To meet Title VI program requirements, The Arc has developed its own procedures in concert with STA procedures to meet certain requirements such as a complaint process and public participation.

General Reporting Requirements

A. Title VI Notice to the Public

The Arc notifies the public that it complies with the requirements of Title VI and related statutes and regulations. Notices are posted at the agency's main lobby located at 320 E. 2nd Avenue, Spokane Washington (**Appendix 1**), in its vehicles and on its website www.arc-spokane.org . The wording of the notice is as follows:

The Arc of Spokane hereby gives public notice that it is its policy to assure full compliance with Title VI of the Civil Rights Act of 1964, and related statutes and regulations in all programs and activities. Title VI requires that no person in the United States of America shall, on the ground of race, color, or national origin, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity for which The Arc receives federal financial assistance.

Any person who believes they have been discriminated against on the basis of race, color or national origin by The Arc of Spokane may file a Title VI complaint by completing and submitting The Arc's Title VI Complaint form. The form must be completed for The Arc to investigate. The Arc of Spokane does not investigate complaints received more than one hundred eighty (180) days after the alleged discriminatory occurrence.

If you need a language translator to assist you in completing the Title VI Complaint form, please contact The Arc of Spokane's Supported Living Administrator at (509) 328-6326 who will help arrange for an interpreter to meet with you.

- *If information is needed in another language, contact (509) 328-6326.*
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- *Для получения информации на другом языке звоните по тел. (509) 328-6326.*
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B. Title VI Complaint Procedures and Form

A Title VI complaint form and instructions for filling out a Title VI complaint can be obtained at The Arc's main office and on the website www.arc-spokane.org. A copy of the complaint form is in **Appendix 2** along with instructions for completing the form.

C. Title VI Investigations, Complaints, and Lawsuits

As of January 1st, 2022, The Arc of Spokane has not received Title VI complaints for the past five years

D. Language Assistance Plan

Limited English Proficiency Plan Policy Statement.

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., provides that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives Federal financial assistance. Title VI and its implementing regulations require that FTA recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who have limited English proficiency (LEP). A person with LEP is one who does not speak English as their primary language and who has a limited ability to read, speak, write or understand English.

The Arc of Spokane relies upon the limited English proficiency analysis conducted by Spokane Transit Authority. The Arc of Spokane adopts the Language Assistance plan of STA.

Source: <https://www.spokanetransit.com/contact/language-assistance>

[www.spokanetransit.com/files/content/2020 Title VI Plan.pdf](http://www.spokanetransit.com/files/content/2020_Title_VI_Plan.pdf) Section 6 pages 37-51

Demographic Analysis

Minority and Low-income Population Summary populations residing within the STA service area.

Language Spoken at Home by Persons over 5 Years Old

County	Pop. Total (persons over 5 years old)	Spanish – Speak English Less than Very Well	Other Indo-European-Speak English Less than Very Well	Asian/Pacific Islander-Speak English Less than Very Well	Other Languages-Speak English Less than Very Well
Spokane	474,707	3,019 0.06%	4,444 0.09%	3,472 0.07%	831 0%

*Source: Spokane Transit Authority **Washington State Office of Financial Management, Forecasting and Research Division. ***The low-income population and percentage were calculated based upon the number of people who answered both questions regarding household size and household income in the 2013-2017 ACS 5-Year estimates

Limited English Proficiency Plan Policy Statement is part of Title VI program that is posted in the main lobby located at 320 E. 2nd ave and on its website www.arc-spokane.org. The statement is also posted in all ADA section 5310 vehicles.

All staff members are trained to provide timely and reasonable language assistance, The Arc of Spokane is contracted with Spokane International Translation for interpretation services.

E. Public Participation Plan

The Arc of Spokane encourages public involvement and participation in decision-making processes. As part of the Spokane Transit Authority's plan for public transit projects, The Arc adopts Spokane Transit Authority's Title VI Plan [https://www.spokanetransit.com/files/content/2020 Title VI Plan.pdf](https://www.spokanetransit.com/files/content/2020_Title_VI_Plan.pdf) section 5 (pages 26-36) and will coordinate with STA in public participation efforts related to transit projects being managed by The Arc of Spokane.

F. Monitoring Sub-recipients

The Arc of Spokane has no sub-recipients. It will cooperate with Spokane Transit Authority in providing information and attending meetings as required by STA in its monitoring procedures of our efforts.

G. Committees and Councils

As a sub-recipient itself to Spokane Transit Authority, The Arc of Spokane has no elected or non-elected boards, committees or councils concerning transportation/public transit.

H. Review of Facilities Constructed

The Arc of Spokane did not build storage facilities, maintenance facilities or operations centers and has not modified any facilities that require a Title VI analysis.

I. Demographics of members

The Arc of Spokane is a chapter of The Arc of Washington and The Arc of the United States. Over 600 chapters across the country are on the front lines to ensure that people with intellectual and developmental disabilities and their families have the support and services they need to be fully engaged in their communities. Our federation of state and local chapters creates a powerful network ensuring that people with IDD and their families have the strongest civil rights advocates promoting and protecting their needs at all levels. The Arc of Spokane supports and serves more than 3,000 individuals and their families with I/DD in Spokane County including 180 active Arc of Spokane community center members and 46 Supported Living clients

Demographics1

HOUSING	Spokane County
Housing units, July 1, 2019, (V2019)	223,079
Owner-occupied housing unit rate, 2015-2019	62.4%
Median value of owner-occupied housing units, 2015-2019	\$224,800
Median selected monthly owner costs -with a mortgage, 2015-2019	\$1,433
Median selected monthly owner costs -without a mortgage, 2015-2019	\$489
Median gross rent, 2015-2019	\$913
Building permits, 2020	3,170
EDUCATION	
High school graduate or higher, percent of persons age 25 years+, 2015-2019	93.8%
Bachelor's degree or higher, percent of persons age 25 years+, 2015-2019	30.8%
POPULATION	
Population Estimates, July 1 2021, (V2021)	NA
Population estimates base, April 1, 2020, (V2021)	NA
Population, percent change - April 1, 2020 (estimates base) to July 1, 2021, (V2021)	0.1%
Population, Census, April 1, 2020	539,339
Population, Census, April 1, 2010	471,221
Age and Sex	
Persons under 5 years, percent	6.0%
Persons under 18 years, percent	22.0%
Persons 65 years and over, percent	6.6%
Female persons, percent	50.4%

Source: <https://www.census.gov/quickfacts/fact/table/spokanecitywashington,US/PST045221>

*** Data from the US Census Bureau 2015-19 American Community Survey 5-Year Estimates

Low Income Demographics2

The below table shows US Census Bureau data from Census.gov/quickfacts. The data shows that all areas served by The Arc of Spokane programs have poverty rates greater than the state average

Percent of Persons in Poverty

County or State	Persons in Poverty, Percent	Population Estimates, July 1, 2019 (V2019)
Spokane County	12.90%	522,798

Minority Demographics 3

The below table of US Census Bureau data, downloaded from Census.gov/quickfacts, shows the percentage of minority populations in all counties served by The Arc of Spokane

Percent of Persons in Counties by Race

County	Pop. Total	White Alone	Black/African American Alone	American Indian and Alaska Native Alone	Asian Alone	Native Hawaiian and other Pacific Islander Alone	Two or More Races	Hispanic or Latino	White Alone, Not Hispanic or Latino
Spokane	522,798	88.9%	2.0%	1.8%	2.4%	0.6%	4.2%	6.1%	84.0%

*** Data from the US Census Bureau 2015-19 American Community Survey 5-Year Estimates

J. Safe Harbor Provision

Safe Harbor Provision According to the US Department of Justice's (DOJ) Safe Harbor Provision, adopted by US Department of Transportation (DOT), a recipient of federal funds will provide written translation of vital documents for language when the LEP population constitutes five percent (5%) or 1,000 persons of the total population served by the agency.

K. Monitoring and LEP Outreach activities

The Arc of Spokane will follow STA's monitoring reviews and update the LAP plan as required.

The Arc of Spokane believes it has taken responsible steps to ensure quality access for LEP persons to utilize transportation programs and does not anticipate implementing any further measures to improve LEP access at this time.

During FY2021, The Arc of Spokane experienced a reduction in paid driver pool (due to the COVID-19 pandemic) and departmental closures but continues to follow safety protocols to provide demand response transportation services. Coordination efforts and activities to identify new transportation resources have been placed on hold due to the Covid -19 pandemic and limited resources available to programs.

L. Documentation of Governing Body Review and Approval of the Title VI Program.

On February 3rd, 2022 The Arc of Spokane's executive branch of the Board of Directors adopted this Title VI program. The documentation of approval is found in **Appendix 3**.

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Title VI Complaint Process and Form

COMPLAINT OF DISCRIMINATION ON THE BASIS OF TITLE VI AGAINST THE ARC OF SPOKANE

Who can file a Title VI complaint?

- A person who believes he or she has experienced discrimination based on race, color, national origin as provided by Title VI of the Civil Rights Act of 1964.
- Someone may file on behalf of classes of individuals.

How do I file a complaint?

- Fill out this form completely to help us process your complaint. Submit the completed form to The Arc of Spokane within 180 calendar days of the alleged discriminatory act.

What happens when I file a complaint?

- The Arc of Spokane will send you a written receipt of your complaint within 15 working days and forward a copy of your completed complaint form to a director of the agency for review. The Arc will designate a person to facilitate and coordinate responses to your Title VI complaint, and this person will contact you.
- Following an investigation of the complaint, The Arc of Spokane will send you a letter of resolution.

What if I don't agree with the department's letter of resolution?

A complainant who does not agree with the letter of resolution may submit a written request for a different resolution to The Arc within 30 days of the date the complainant receives the response.

Do I need an attorney to file or handle complaint?

No. However, you may wish to seek legal advice regarding your rights under the law.

Return this form to:

The Arc of Spokane
Attn: Supported Living Administrator
320 E. 2nd Avenue
Spokane WA 99202
Telephone: 509-328-6326
Email: jmiller@arc-spokane.org

COMPLAINT OF DISCRIMINATION ON THE BASIS OF TITLE VI AGAINST THE ARC OF SPOKANE

Complainant Contact Information

Name

Street address/City/State/Zip code

Work phone # / Home phone # / Message phone #

Email address

Aggrieved party contact information (if different from complainant):

Name

Relationship to the Complainant

Street address/City/State/Zip code

Work phone # / Home phone # / Message phone #

Email address

Does the Complainant know you are filing this complaint? Yes No

Date of Incident (month/day/year)

Which of the following best describes the reason you believe the alleged discrimination took place? Select all that apply. What it because of your:

- Race
- Color
- National origin
- Sex
- Other _____

Statement of Complaint

In your own words, describe the alleged discrimination. Explain what happened and who you believe was responsible. Include all facts upon which the complaint is based. Please attach additional sheets if needed.

Please give the name(s), mailing address, home phone number and cell phone number for anyone who witnessed the alleged discrimination. Attach additional sheets if needed.

What would you consider an appropriate resolution to your complaint?

If you have filed a grievance, complaint or lawsuit regarding this matter anywhere else, give name(s) and address(es) of each place where you have filed. Attach additional sheets if needed.

Please sign below. You may attach any written materials or other information that you think is relevant to your complaint.

I affirm that the foregoing information is true to the best of my knowledge and belief. I understand that all information becomes a matter of public record after the filing of this complaint.

Complainant

Date

Within 15 working days of receiving the completed complaint, The Arc of Spokane will acknowledge receipt of the complaint in writing. The letter will include information about the investigative steps to be taken and a timeline for resolution. If additional information is needed from the complainant, The Arc will request that information be provided in writing to append to the original complaint. A final letter of resolution will be sent to the complainant on completion of the investigation.

Upon request, alternative formats of this document will be produced for people with disabilities. Call 509-328-6326 or email jmiller@arc-spokane.org

**The Arc of Spokane
Executive Branch Board of Directors Approval of Title VI Program**

Handwritten Signature / Board President
Signature of approval / Title

2/4/22
Date

Handwritten Signature
Signature of approval/ Title

2/4/22
Date